

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

-vs-

VOLUME III

JEFFREY EPSTEIN,

Defendant.

Related cases:

08-80232, 08-08380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-801092

VIDEO-CONFERENCED AND VIDEOTAPED
DEPOSITION OF JANE DOE

Wednesday, September 30, 2009
9:37 a.m. - 6:10 p.m.

One Clearlake Centre
250 South Australian Avenue, 1st Floor
West Palm Beach, Florida 33401

Reported By:
Pamela J. Sullivan, RPR, FPR, CLR
Prose Reporting Agency, Inc.

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EFTA00750774

1 APPEARANCES:
 2 On behalf of the Plaintiff, Jane Doe:
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 8 [REDACTED]
 9 On behalf of the Defendant, Jeffrey Epstein:
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 15 [REDACTED]
 16 On behalf of the Defendant, Jeffrey Epstein:
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 Miami, Florida 33160
 [REDACTED]

1 ---
 2 INDEX
 3 ---
 4 WITNESS: DIRECT CROSS REDIRECT RECROSS
 5 JANE DOE
 6 BY MR. CRITTON 5
 7
 8 ---

EXHIBITS MARKED

9 ---
 10
 11 DESCRIPTION PAGE
 12 Defendant's No. 6 390
 13 (Plaintiff's Answers to Defendant's Interrogatories)
 14 Defendant's No. 7 *
 15 (Ltr to Edwards from Critton w/Enclosures)

(* Marked off the record.)

1 On behalf of the Plaintiff C.M.A.:
 2 JACK P. HILL, ESQUIRE
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 7 On behalf of the B.B.:
 8 ADAM J. LANGINO, ESQUIRE
 9 LEOPOLD KUVIN
 10 2925 PGA Boulevard, Suite 200
 11 Palm Beach Gardens, Florida 33410
 12 [REDACTED]
 13 ALSO PRESENT:
 14 Jeffrey Epstein, via video conference
 15 Stan Sanders, Videographer
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

1 PROCEEDINGS
 2 ---
 3 (Continued from Volume II of the same day.)
 4 BY MR. CRITTON:
 5 Q. Ms. Jane Doe, other than speaking with your
 6 attorney over the lunch hour, did you speak with anyone
 7 else?
 8 A. No.
 9 Q. Are you on any medication today?
 10 A. No.
 11 Q. When is the last time you had any pot,
 12 marijuana?
 13 MR. EDWARDS: Object to the form.
 14 BY MR. CRITTON:
 15 Q. And when I say had, smoke.
 16 A. Before I was pregnant with my daughter.
 17 Q. Okay. And it's your testimony that, since
 18 the time you've been pregnant, you have not taken -- you
 19 haven't smoked pot and you haven't taken any drugs or
 20 alcohol -- I'm sorry -- any illegal and/or -- any
 21 illegal drugs or prescription drugs that would have gone
 22 to someone else, like a Xanax; is that correct?
 23 MR. EDWARDS: Object to the form.
 24 THE WITNESS: What was the question?
 25

1 BY MR. CRITTON:
 2 Q. It's your testimony that, since the time you
 3 were pregnant, you haven't had any illegal drugs and/or
 4 any drugs that weren't prescribed specifically for you?
 5 A. Yes, that's true.
 6 Q. Okay. And you -- and you have roxy. I asked
 7 you earlier whether you knew what that was. My
 8 understanding is you smoke that; is that correct?
 9 MR. EDWARDS: Object to the form.
 10 BY MR. CRITTON:
 11 Q. You -- and it's a smokable drug?
 12 MR. EDWARDS: Object to the form.
 13 THE WITNESS: I have heard of people eating
 14 them and snorting them and smoking them and
 15 shooting them up.
 16 BY MR. CRITTON:
 17 Q. Okay. And it's your testimony you've never
 18 done those?
 19 A. Yes.
 20 Q. When is the last time you spoke with -- well,
 21 I asked you a question earlier: Who else was living
 22 with you and your boyfriend, [REDACTED], and your child at
 23 your house? And your attorney instructed you not to
 24 answer. Do you remember that?
 25 A. Yes.

1 Q. You need to keep your voice up, because I'm
 2 having trouble hearing you, ma'am.
 3 A. She's older than me.
 4 Q. Okay. And why did she live with you?
 5 A. I guess her mom was staying in a -- in an
 6 efficiency, I guess, with her boyfriend, and I guess
 7 there really wasn't room for [REDACTED]. She didn't have
 8 anywhere to live.
 9 Q. And were you living at [REDACTED]
 10 house at the time?
 11 A. Yes.
 12 Q. Okay. And how long did [REDACTED] live with you?
 13 A. A month or two.
 14 Q. All right. Since that -- other than that one
 15 time, has [REDACTED] ever lived with you again?
 16 A. No.
 17 Q. Has she ever stayed with you again?
 18 A. No.
 19 Q. Do you know where [REDACTED] is right now?
 20 A. No.
 21 Q. When is the last time you talked to [REDACTED]?
 22 A. Several months ago. I'm not sure.
 23 Q. Okay. And what was the event that caused you
 24 and [REDACTED] to not be close anymore?
 25 A. She moved.

1 Q. Okay. Is the person who -- is it more than
 2 one additional person who is living with you at that
 3 house?
 4 A. No.
 5 Q. Okay. Is that person still there now?
 6 MR. EDWARDS: Don't answer.
 7 Other identifying information about the
 8 address. I think it's -- it's pretty clear she's
 9 not going to answer anything that's going to
 10 indicate to you where she's living currently. Now,
 11 all other addresses, you know them, and she'll tell
 12 you that.
 13 MR. CRITTON: I understand. So my position
 14 is clear is that person that's been, apparently, is
 15 living there, she, she would have information --
 16 she or he would have information regarding aspects
 17 of the Plaintiff's claim clearly is a relevant
 18 witness, and --
 19 MR. EDWARDS: Okay. I understand.
 20 BY MR. CRITTON:
 21 Q. Has [REDACTED] ever lived with you?
 22 A. Yes.
 23 Q. Okay. When?
 24 A. We were 14, I believe. She was 14, I was 13,
 25 because she's older than I am.

1 Q. Just she moved?
 2 A. She moved far away from me. I don't know
 3 where. And I guess she -- I don't know. I guess she
 4 doesn't...
 5 Q. Do you have her phone number?
 6 A. No.
 7 Q. Okay. Did you have it before she moved?
 8 A. Yes.
 9 Q. Have you -- when you've talked to [REDACTED], does
 10 [REDACTED] ever say, I -- I know where [REDACTED] is, or I talked to
 11 [REDACTED] the other day?
 12 A. No.
 13 Q. And tell me when the last time was that you
 14 spoke with [REDACTED].
 15 A. Probably a month and a half, maybe two months
 16 ago.
 17 Q. Okay. Which would -- if we're in the end of
 18 September, it would have been sometime in early or mid
 19 July?
 20 A. Yes.
 21 Q. Okay. And did you only talk to her over the
 22 phone?
 23 A. We went to the beach.
 24 Q. Did you take your respective children?
 25 A. Yes.

1 Q. Okay. And you talked about this case; didn't
2 you -- your cases?
3 A. No, we did not.
4 Q. Subject never came up, is your testimony?
5 A. No.
6 Q. That's correct?
7 A. That is correct.
8 Q. Other than that, have you seen or talked to
9 [REDACTED]?
10 A. No.
11 Q. Okay. Well, didn't you baby-sit for [REDACTED]'s
12 son?
13 A. Yes.
14 Q. Okay. When was that?
15 A. I'm not exactly sure.
16 Q. Wasn't that after you went to the beach,
17 approximately a month and a half to two months ago?
18 A. I don't remember if it was before or after.
19 Q. And did she drop -- how does -- how -- what
20 was the occasion that she asked you to sit for her son?
21 A. She had to work.
22 Q. Where was she working?
23 A. I think she was working in like a -- like a
24 skin care place. I'm not sure.
25 Q. How many times did you baby-sit for her son?

1 MR. EDWARDS: Object to the form.
2 BY MR. CRITTON:
3 Q. Or watch her son?
4 MR. EDWARDS: Ever, you mean?
5 MR. CRITTON: Ever.
6 MR. EDWARDS: Ever. Okay.
7 THE WITNESS: Probably like two or three
8 times.
9 BY MR. CRITTON:
10 Q. Did she pay you?
11 A. Yes.
12 Q. How much did she pay you?
13 A. Well, she only paid me once, like \$20 or
14 something.
15 Q. Would you let [REDACTED] watch your daughter?
16 A. Absolutely.
17 Q. Do you know [REDACTED] to be or to have been a
18 prostitute?
19 A. No.
20 Q. You know what a prostitute is?
21 A. Yes, I do.
22 Q. Did [REDACTED] ever tell you that she received
23 money for giving sexual -- or performing sexual acts for
24 men?
25 A. No.

1 Q. Did [REDACTED] ever tell you she was a call girl?
2 A. No.
3 Q. You know what a call girl is?
4 A. Yes.
5 Q. Did you ever ask [REDACTED] if she was a
6 prostitute?
7 A. No.
8 Q. Did you ever ask [REDACTED] how she made her money?
9 A. No.
10 Q. Is [REDACTED] a prostitute?
11 A. Not that I know of.
12 Q. Has she ever been a prostitute?
13 A. Not that I know of.
14 Q. Do you consider yourself to be a prostitute?
15 A. No, I do not.
16 Q. Have you ever engaged in prostitution?
17 A. Besides Jeffrey Epstein, no.
18 Q. Well, what do you -- what do you consider a
19 prostitute to be?
20 A. Somebody who gets paid for giving sexual
21 favors.
22 Q. Separate and apart from any activities with
23 Mr. Epstein, have you ever performed or given sex,
24 sexual favors, using your term, for money?
25 A. No.

1 Q. Now, you've worked at some strip clubs; have
2 you not?
3 A. Yes.
4 Q. And you worked at [REDACTED] down in
5 [REDACTED] --
6 A. Yes.
7 Q. -- true?
8 A. Yes.
9 Q. Okay. And I think you said you worked at
10 [REDACTED] for approximately eight months?
11 A. Something like that, yes.
12 Q. Who was your boss, or who was the manager or
13 the person that you had to report to?
14 A. The owner of the club was named [REDACTED].
15 Q. Do you know what his last name was?
16 A. No, I do not.
17 Q. How did you get -- was -- was anyone working
18 at [REDACTED] that you knew at the time you applied
19 for the job, the position?
20 A. Yes.
21 Q. Who?
22 A. [REDACTED].
23 Q. And how was it that you came to get a job at
24 [REDACTED]; that is, why?
25 A. Um.

1 Q. This was in 2006?
 2 A. It was after I was 18, so... I'm not sure
 3 what year.
 4 Q. Well, you were born [REDACTED] correct?
 5 A. Yes.
 6 Q. Okay. [REDACTED]
 7 All right? So if you worked seven months there or eight
 8 months, it would have been sometime after June -- what
 9 would you say your birthday was?
 10 A. Seventeenth.
 11 Q. All right. Sometime after June 17th of '06,
 12 probably running into sometime in '07; true?
 13 A. Yes.
 14 Q. And so [REDACTED] -- what caused you to get the
 15 job, or why did you come -- why did you come to get a
 16 job at [REDACTED]?
 17 A. [REDACTED] brought me there.
 18 Q. Okay. But your choice to go; right?
 19 A. Yes.
 20 Q. Okay. And what did you do -- what did you
 21 say or how did it happen that you went to get the job?
 22 [REDACTED] was dancing there; you knew that?
 23 A. Yes.
 24 Q. Okay. And she was a stripper?
 25 A. Yes.

1 Q. Did she tell you how much money she made?
 2 A. No.
 3 Q. Did she tell you what she had to do to earn
 4 money?
 5 A. Dance.
 6 Q. What else?
 7 A. Take her clothes off, strip.
 8 Q. All right. And did she -- did she do -- did
 9 she do bachelor parties?
 10 A. Not that I know of.
 11 Q. Okay. Did she do lap dances?
 12 A. Yes.
 13 Q. All right. And did she work the stage?
 14 A. Yes.
 15 Q. Did table dances, as well?
 16 A. They don't have table dances.
 17 Q. What do they have? Lap dances?
 18 A. Yes.
 19 Q. And what did [REDACTED] tell you about that work?
 20 A. She just told me that, like, you had to go on
 21 stage and dance, and that's how you made money, by
 22 dancing.
 23 Q. Did you say -- what were you doing at the
 24 time? Where were you living in 2006 when you had just
 25 turned 18?

1 A. I was living with [REDACTED]
 2 Q. And were you living at the apartment?
 3 A. Yes.
 4 Q. That's when she was living with [REDACTED]
 5 A. Yes.
 6 Q. So you're living at the apartment, and that's
 7 when you started -- you knew she was working at [REDACTED]
 8 [REDACTED] so she said, why don't you come with me, or
 9 something like that?
 10 A. Yes. But this was the second time that I
 11 lived with her.
 12 Q. I thought you said the second time was in
 13 2007.
 14 A. I just know that I had turned 18 since I
 15 started dancing, so I may have been close to 19 or 19
 16 when I did start.
 17 Q. Okay. Well, now, was [REDACTED] living at the
 18 Royal Palm Beach house, or was she living in the
 19 apartment with [REDACTED]?
 20 A. The Royal Palm Beach place was an apartment,
 21 also, and [REDACTED] also lived there.
 22 Q. Okay. Well, you testified earlier that in
 23 2006 you spent a few -- a few months with her.
 24 A. Uh-huh.
 25 Q. And then -- and that was in the apartment in

1 West Palm Beach. And then the second time, I thought
 2 you said you only spent about a month. I may have been
 3 wrong.
 4 A. Yes, I did only spend about a month.
 5 Q. Okay. Was -- and the one month was at the
 6 Royal Palm Beach house?
 7 A. Yes.
 8 Q. Okay. So is it now your testimony that you
 9 went to work at [REDACTED] in 2007?
 10 A. That's possible.
 11 Q. Well, I don't know, because I wasn't there.
 12 That's why I'm just trying to ask. Because earlier you
 13 testified it was 2006, and I think that's what your
 14 answers to interrogatories reflect. So what is it?
 15 A. Well, it --
 16 Q. What's the current answer?
 17 MR. EDWARDS: Object to the form.
 18 THE WITNESS: It was definitely after I
 19 turned 18. I don't know exactly what day it was.
 20 I don't know what month or year. I don't know. I
 21 don't like write down, I started stripping today.
 22 No, I didn't do that.
 23 BY MR. CRITTON:
 24 Q. Do you ever keep diaries?
 25 A. No.

1 Q. Have you kept diaries?
 2 A. No. Never.
 3 Q. Have you filed any tax returns?
 4 A. No.
 5 Q. Have you ever filed a tax return?
 6 A. No.
 7 Q. Have you ever consulted anyone about whether
 8 you need to file a tax return?
 9 A. No.
 10 Q. When you worked -- so is it your recollection
 11 that [REDACTED] was living -- or you were living with [REDACTED] at
 12 Royal Palm, or West Palm, at the time you started
 13 stripping?
 14 A. Royal Palm.
 15 Q. What work -- before you started stripping,
 16 what work had you ever done to make money, other than
 17 [REDACTED]?
 18 A. That's it.
 19 Q. Was [REDACTED] -- and I think you told me about
 20 [REDACTED].
 21 A. Yes.
 22 Q. That was like a, what, a week or a month or
 23 something?
 24 A. A week.
 25 Q. Excuse me. And that didn't work out; right?

1 A. Right.
 2 Q. Okay. So the only other job you've had in
 3 your entire life was working at [REDACTED]?
 4 A. Yes.
 5 Q. Okay. And why did you leave? Once you got
 6 the job at [REDACTED] as a waitress, why did you stop working
 7 at [REDACTED]?
 8 A. I just -- I don't know. I just didn't want
 9 to work there anymore. I guess I just wasn't getting
 10 along with everybody.
 11 Q. Okay. One month?
 12 A. Yes.
 13 Q. Okay. And you got salary or minimum wage?
 14 A. Yes.
 15 Q. Plus tips?
 16 A. Yes.
 17 Q. How much money did you make there?
 18 A. Not very much.
 19 Q. All right. So now you're 18, or over 18,
 20 maybe over -- closer to 19. The only job you've ever
 21 had in your whole life is working at [REDACTED] for minimum
 22 wage and tips; right?
 23 A. Yes.
 24 Q. Had you been to [REDACTED] yet?
 25 A. Yes.

1 Q. Okay. Because [REDACTED] was when you were 17?
 2 A. Yes.
 3 Q. So what other jobs did you -- had you ever
 4 applied for another job, other than [REDACTED]?
 5 A. Yes.
 6 Q. Where?
 7 A. At the mall.
 8 Q. But no one had ever hired you?
 9 A. No.
 10 Q. So how many different places did you apply
 11 for a job?
 12 A. A few. Two or three, maybe.
 13 Q. So you applied for the jobs. You didn't get
 14 those. You quit the [REDACTED] job voluntarily, because you
 15 didn't like it; right?
 16 A. Right.
 17 Q. Because you weren't getting along with whom?
 18 The boss?
 19 A. No.
 20 Q. Who?
 21 A. It was actually [REDACTED]'s brother that I was not
 22 getting along with.
 23 Q. What's his name?
 24 A. [REDACTED].
 25 Q. [REDACTED] what?

1 A. [REDACTED]
 2 Q. And why? Why weren't you getting along with
 3 him?
 4 A. Because he -- well, I thought that he stole
 5 some money from the restaurant while I was working one
 6 night. And he called me and said a bunch of nasty
 7 things to me, because I was basically implicating that
 8 he had stolen some money from the restaurant.
 9 Q. Well, you believed it to be true?
 10 A. Yes.
 11 Q. Okay. And so what, what happened?
 12 A. He was just like really rude to me all the
 13 time, and he told me that he was like -- I -- I mean, I
 14 don't remember specifically what he said, but he told me
 15 that, you know, he was going to like, you know, do
 16 something to hurt me or my family.
 17 Q. So you stopped working. Did you tell [REDACTED]
 18 that?
 19 A. Yes, I did.
 20 Q. And so how, then, did you get the strip job?
 21 [REDACTED] said, well, why don't you come with me; you can
 22 strip.
 23 A. Yes.
 24 Q. And did you say, I don't really want to be a
 25 stripper?

1 A. At first I did, yes.
 2 Q. And so why did you do it?
 3 A. Because I needed money.
 4 Q. Well, you could have applied for other jobs;
 5 couldn't you?
 6 A. I tried to apply at a few places, and I never
 7 got the job.
 8 Q. Well, you applied for what, one or two places
 9 in the mall?
 10 A. I applied at some restaurants and some other
 11 places I don't exactly remember.
 12 Q. So you go down with [REDACTED] to [REDACTED]?
 13 A. Yes.
 14 Q. And you talked to [REDACTED]?
 15 A. Yes.
 16 Q. Is he the one who hired you?
 17 A. Yes.
 18 Q. Did you have any experience dancing,
 19 stripping?
 20 A. No. No.
 21 Q. And what did you have to do in order to get
 22 the job?
 23 A. Show them my ID.
 24 Q. And did he say, have you stripped before?
 25 A. No.

1 Q. Did he ask you any questions at all?
 2 A. No.
 3 Q. Had you ever danced before anyplace?
 4 A. No.
 5 Q. Did [REDACTED] tell you how -- show you how you'd
 6 have to dance, in order to make money?
 7 A. Yes.
 8 Q. Okay. During the time you worked at [REDACTED]
 9 [REDACTED], did you have a stage name, or did
 10 you just use your own name?
 11 A. Yes, I did.
 12 Q. Yes, you did what? Have a stage name?
 13 A. I had a stage name.
 14 Q. What was your stage name?
 15 MR. EDWARDS: Form.
 16 THE WITNESS: [REDACTED].
 17 BY MR. CRITTON:
 18 Q. [REDACTED]?
 19 A. Yes.
 20 Q. Okay. And what kind of outfits did you wear?
 21 Did you have one outfit that was like the -- your
 22 trademark, so to speak?
 23 A. No.
 24 Q. What kind of outfits did you wear?
 25 A. Stripper outfits; I don't know.

1 Q. Where did you get them?
 2 A. I got a lot of them from the flea market.
 3 Q. 45th Street?
 4 A. Yes.
 5 Q. And they have stripper outfits?
 6 A. Yes.
 7 Q. Did [REDACTED] show you any of her tricks of the
 8 trade, so to speak, so you could make money?
 9 A. She just showed me how to dance.
 10 Q. Did she show you before you went up there
 11 that first time?
 12 A. Yes.
 13 Q. Where did you -- did you practice at home --
 14 or at her home?
 15 A. No.
 16 Q. Where did you practice, or didn't you?
 17 A. At [REDACTED].
 18 Q. So you could practice during the day before
 19 you actually ended up on stage?
 20 A. Yes.
 21 Q. Did you know any of the other girls who
 22 worked at [REDACTED] before you went?
 23 A. No.
 24 Q. Did you ever work at a place where [REDACTED]
 25 worked?

1 A. No.
 2 Q. Were you aware where [REDACTED] worked?
 3 A. No.
 4 Q. Okay. Were you ever aware that [REDACTED] worked
 5 at [REDACTED]?
 6 A. No.
 7 Q. Do you know what a jack shack is?
 8 A. I've heard of it.
 9 Q. Okay. Do you know whether [REDACTED] worked jack
 10 shacks?
 11 A. Not that I know of.
 12 Q. Did you ever ask her?
 13 A. No.
 14 Q. Do you know a lady -- a person named [REDACTED]?
 15 A. No, I do not.
 16 Q. You sure?
 17 A. Yes.
 18 Q. She's a friend of [REDACTED]'s. You don't know
 19 [REDACTED]?
 20 MR. EDWARDS: Object to the form. Asked and
 21 answered.
 22 THE WITNESS: I don't know her.
 23 BY MR. CRITTON:
 24 Q. What were your hours at [REDACTED]?
 25 A. Seven to 2:00.

1 Q. Seven p.m. --
 2 A. Yes.
 3 Q. -- to 2:00 in the morning?
 4 A. Yes.
 5 Q. Okay. And how were you paid?
 6 A. Tips.
 7 Q. Did you have to share any with the house?
 8 A. Yes.
 9 Q. And what was the percent that you got to
 10 keep, and the percent that you had to pay the house?
 11 A. I just had to tip the DJ and the manager like
 12 \$15 each, or something.
 13 Q. Okay. And how much did you make generally a
 14 night?
 15 A. I don't know. Couple of hundred dollars.
 16 MR. EDWARDS: Speak a little bit louder, just
 17 so that they can hear you.
 18 BY MR. CRITTON:
 19 Q. Couple of hundred dollars?
 20 A. Yes.
 21 Q. Okay. Did you ever make more than that?
 22 A. Not really.
 23 Q. That was pretty much your average take?
 24 A. Yes.
 25 Q. How many days a week did you work?

1 A. Whenever I wanted to.
 2 Q. All right. How many days a week did you want
 3 to work?
 4 A. Sometimes it was every night; sometimes it
 5 was one or two nights.
 6 Q. And how would you decide, just if you needed
 7 money?
 8 A. Pretty much, or if I felt like it.
 9 Q. In addition to doing -- you'd dance and you'd
 10 take your clothes off; right?
 11 A. Yes.
 12 Q. Okay. And did you take all your clothes off?
 13 A. Yes.
 14 Q. Okay. Everything, tops and bottoms?
 15 MR. EDWARDS: Object to the form.
 16 THE WITNESS: Yes.
 17 BY MR. CRITTON:
 18 Q. And you did that sometimes seven days a week,
 19 sometimes only two or three or four times a week, for
 20 eight months; is that correct?
 21 A. Yeah. Sometimes I didn't go for two weeks
 22 and, you know, I -- I just went whenever I felt like it.
 23 I mean, sometimes I didn't go for a month.
 24 Q. Did -- and -- and prior to starting at
 25 [REDACTED] -- or let me ask you -- ask you this:

1 Have you ever had any kind of plastic surgery?
 2 A. No.
 3 Q. Any kind of -- had any kind of breast
 4 implants?
 5 A. No.
 6 Q. In terms of [REDACTED], in addition to
 7 doing the dancing on the stage, did you ever do bachelor
 8 parties?
 9 A. No.
 10 Q. Okay. Did you do lap dances?
 11 A. Yes.
 12 Q. And how much did you charge for a lap dance?
 13 A. There was a house fee, so it was like 25 or
 14 \$30 for like one song.
 15 Q. So in addition to your stage dancing, where
 16 you get tips, you also did lap dances?
 17 A. Yes.
 18 Q. All right. And were they friction dances?
 19 A. Yes.
 20 Q. And in terms of the men that you -- and these
 21 were always all with men; I assume. Any women? Did you
 22 have to do lap dances for women at times, too?
 23 A. Like once or twice.
 24 Q. And when you would do the lap dances for the
 25 men, in addition to the house charge, you would try to

1 do more so that you could get a better tip; true?
 2 A. No.
 3 Q. Okay. Well, you were doing friction dances,
 4 and friction dances are where you're rubbing up against
 5 the men; right?
 6 A. Yes.
 7 Q. All right. And men get erections; true?
 8 MR. EDWARDS: Object to the form.
 9 THE WITNESS: That's probably true, but I
 10 never touched anybody at the strip club there.
 11 BY MR. CRITTON:
 12 Q. Okay. So you're saying you danced for eight
 13 months at [REDACTED], you're doing friction dances,
 14 dancing with men, and it's your testimony you never
 15 know -- you never knew whether any of them ever got an
 16 erection; is that true?
 17 MR. EDWARDS: Form.
 18 THE WITNESS: Yes.
 19 BY MR. CRITTON:
 20 Q. Did you -- did they have a champagne room, or
 21 some equivalent of that, at -- excuse me -- at [REDACTED]
 22 [REDACTED]?
 23 A. Yes.
 24 Q. Okay. Did you ever go back into the
 25 champagne room?

1 A. Yes.
 2 Q. On how many occasions? At least once a week?
 3 Twice a week? More?
 4 A. I don't --
 5 MR. EDWARDS: Form.
 6 THE WITNESS: I don't know. Once a week.
 7 BY MR. CRITTON:
 8 Q. All right. And when you would go back in the
 9 champagne room, it would be you and -- and just one man,
 10 generally?
 11 A. And a bouncer outside the door.
 12 Q. Okay. So if you needed help, or if
 13 something --
 14 MR. EDWARDS: Form.
 15 BY MR. CRITTON:
 16 Q. -- happened that was inappropriate, then you
 17 can call for the bouncer?
 18 A. Yes.
 19 Q. Okay. And just when you were at -- when you
 20 were at that club, if something inappropriate happened,
 21 you could turn around and say -- you could leave the
 22 room; right?
 23 A. Yes.
 24 Q. All right. And you -- and you knew that --
 25 A. Yes.

1 Q. -- that if something inappropriate happened,
 2 and that you could leave the room, because it was -- it
 3 was voluntary for you to either go into the room or not
 4 go into the room?
 5 A. Yes.
 6 Q. You could stay as long or as little as you
 7 want?
 8 A. No.
 9 Q. Well, you could leave, if the -- what you
 10 felt the man's conduct was inappropriate; true?
 11 A. Yes.
 12 Q. Did you ever have to call a bouncer?
 13 A. Yes.
 14 Q. Okay. Did any male at that -- at [REDACTED]
 15 ever try to attack you, to use force?
 16 A. I -- I don't -- I wouldn't really say that
 17 anybody tried to attack me, but there have been a few
 18 times where a man like tried to grab me and pull me on
 19 top of him, and I had to call somebody to help me.
 20 Q. Okay. And when you were in the champagne
 21 room, they'd -- the men paid more for that; did they
 22 not?
 23 MR. EDWARDS: Object to the form.
 24 THE WITNESS: Yes.
 25

1 BY MR. CRITTON:
 2 Q. And did you get more money for that, as well?
 3 A. Yes.
 4 Q. Okay. And did you strip naked in the
 5 champagne room?
 6 A. I didn't take my bottoms off.
 7 Q. Took your top off?
 8 A. Yes.
 9 Q. And then you did a -- would it be a fair
 10 statement to say that would have been a serious friction
 11 dance in the champagne room?
 12 A. No. It just made it so that other people
 13 couldn't see.
 14 Q. All right. Well, is -- isn't it true, when
 15 you went into the champagne room, there's -- oftentimes
 16 there was some form of sex that occurred?
 17 MR. EDWARDS: Form.
 18 THE WITNESS: That is not true.
 19 BY MR. CRITTON:
 20 Q. So it's your testimony that in all of the
 21 times that you went in the champagne room, that you
 22 never had any type of sexual activity with the men in
 23 the champagne room?
 24 A. That is correct.
 25 Q. And consistent with what you told me earlier,

1 you never even saw whether a man got an erection when
 2 you were in those rooms; is that your testimony?
 3 A. Yes.
 4 Q. During the time you worked at [REDACTED],
 5 how many men did you go home with?
 6 A. Zero.
 7 Q. In addition to -- did you ever do a bachelor
 8 party?
 9 A. No.
 10 Q. Did you ever do a strip-o-gram?
 11 A. No.
 12 Q. Separate and apart from the dancing you did
 13 at [REDACTED], did you ever go to anyone's house to
 14 perform any type of strip tease services?
 15 A. No.
 16 Q. If someone would testify that you had, that
 17 person would be saying -- would be not telling us the
 18 truth?
 19 MR. EDWARDS: Object to the form.
 20 BY MR. CRITTON:
 21 Q. Is that correct?
 22 A. Absolutely.
 23 Q. Did you like stripping?
 24 A. No.
 25 Q. Why did you do it, then?

1 A. Because I needed money.
 2 Q. For what?
 3 A. To live.
 4 Q. I thought you were living with -- with [REDACTED]
 5 [REDACTED] at this time.
 6 A. Yes.
 7 Q. Okay. Well, you said earlier that she
 8 supported you.
 9 A. Would you like to be 18, asking [REDACTED]
 10 [REDACTED] for money?
 11 Q. My question to you is: You told me that she
 12 was supporting you. Did you tell [REDACTED] you
 13 were stripping?
 14 MR. EDWARDS: Object to the form.
 15 THE WITNESS: Yes.
 16 BY MR. CRITTON:
 17 Q. Okay. And what did she say?
 18 A. I don't know.
 19 Q. She had to have said something. Did she ever
 20 say, you don't -- I don't want you doing that? I'll
 21 help you get a job at [REDACTED]. You can come to work
 22 for me. I'm a manager; I can help you get a job.
 23 A. No.
 24 Q. And did you ever say, hey, [REDACTED], can you
 25 help me get a job at [REDACTED]? I'd like to -- I'd

1 A. No.
 2 Q. Why not?
 3 A. I guess they weren't hiring. I don't know.
 4 Q. Okay. Did you keep going back?
 5 A. Yes.
 6 Q. Say, I have experience?
 7 A. Yes.
 8 Q. How many places do you think you applied
 9 before you started stripping?
 10 A. I don't know.
 11 Q. After you left [REDACTED], then you went
 12 to [REDACTED]?
 13 A. Yes.
 14 Q. Were you still living with [REDACTED]
 15 A. Yes.
 16 Q. Were you dating anybody at this time period,
 17 this time period being were you dating anybody during
 18 the time you were working at [REDACTED]?
 19 A. I started seeing [REDACTED] at the time.
 20 Q. And that would have been in 2007?
 21 A. Yes.
 22 Q. Okay. And when did you and [REDACTED] start
 23 living together?
 24 A. I believe it was August of '07.
 25 Q. Is he employed?

1 like to work at [REDACTED]. You know I'm smart. You
 2 know I'm qualified. I can do something there. Can you
 3 help me do that?
 4 A. I can't work at [REDACTED] because I live
 5 with her.
 6 Q. Okay. Well, did you say, can you help me get
 7 a job someplace else then?
 8 A. No.
 9 Q. Why not?
 10 A. Because I tried before.
 11 Q. Well, if I send you an interrogatory that
 12 says, tell me all the places you applied, I should be
 13 able to get applications of all these places that you
 14 applied; right?
 15 MR. EDWARDS: Object to the form.
 16 THE WITNESS: So what do you mean? You want
 17 the applications that I --
 18 BY MR. CRITTON:
 19 Q. Yeah. How many places did you ever apply
 20 before you started stripping?
 21 A. I don't know. I went to --
 22 Q. Two or three?
 23 A. I went to the few places at the mall, and I
 24 went to all the restaurants that were around my house.
 25 Q. And nobody would hire you?

1 A. Not currently.
 2 Q. Has he ever been?
 3 A. Yes.
 4 Q. What kind of work did he do?
 5 A. He worked at [REDACTED], washing cars.
 6 Q. What's his educational background?
 7 A. He dropped out in the tenth grade.
 8 Q. Is he a Palm Beach County person?
 9 A. [REDACTED].
 10 Q. When is the last time -- when you met him, he
 11 was working for [REDACTED] [REDACTED]?
 12 A. No.
 13 Q. Who was he working for, or was he not
 14 working?
 15 A. He was not working at the time.
 16 Q. Okay. When you started living together in
 17 August of '07, did he have a job?
 18 A. He got a job afterward.
 19 Q. At [REDACTED]?
 20 A. Yes.
 21 Q. And how long did he work with [REDACTED]?
 22 A. He worked at a restaurant in Boca for like
 23 eight months, I think, or seven months, maybe. And then
 24 he didn't have a job for, oh, probably seven months
 25 again, and then he got the job at [REDACTED].

1 Q. But he's -- are you saying he's working there
2 now?
3 A. He is not working there now.
4 Q. Okay. How long did he work -- at the Boca
5 restaurant, which restaurant did he work at?
6 A. [REDACTED].
7 Q. Doing what?
8 A. Bus -- busboy.
9 Q. Okay. And then he was off for about seven --
10 six or seven months, and then he got a job with [REDACTED]
11 [REDACTED]?
12 A. Yes.
13 Q. Okay. How long did he have that job washing
14 cars?
15 A. I'm not sure. Probably about the same length
16 of time.
17 Q. All right. When -- and when did he get --
18 did he get laid off, or fired in -- well, let me strike
19 that.
20 From the restaurant job, did he get laid off,
21 or fired?
22 A. I'm not exactly sure.
23 Q. Okay. How about [REDACTED] [REDACTED]?
24 A. He -- he got another job as a telemarketer,
25 and so quit the job at [REDACTED]. And then the

1 telemarketing job didn't work out.
2 Q. What was that, last for a month or something?
3 A. He was -- he stayed there for about three
4 weeks, maybe a month, and didn't make any money, so he
5 ended up having to leave them.
6 Q. And you say a Boca restaurant. Do you think
7 he was terminated?
8 MR. EDWARDS: Form.
9 THE WITNESS: I know that he was terminated.
10 I don't know if he was laid off or fired, though.
11 BY MR. CRITTON:
12 Q. And -- and with the telemarketing job, when
13 did he last have the telemarketing job?
14 A. About a month or two ago.
15 Q. Is he out looking for a job?
16 A. He is trying to get a job, yes.
17 Q. Okay. Does he have any type of criminal
18 record?
19 A. Yes.
20 Q. For what?
21 A. He is --
22 MR. EDWARDS: Form.
23 THE WITNESS: He's on house arrest right now.
24 BY MR. CRITTON:
25 Q. For what?

1 A. For sale of cocaine.
2 Q. So he's a drug dealer -- or was a drug
3 dealer --
4 MR. EDWARDS: Form.
5 THE WITNESS: He --
6 BY MR. CRITTON:
7 Q. -- is that true?
8 A. He got cocaine from a friend of his and sold
9 it to somebody else and --
10 Q. So he's a drug dealer; he sold drugs?
11 MR. EDWARDS: Form.
12 THE WITNESS: That was not his occupation.
13 He actually was doing it like as like a one-time
14 thing, and --
15 BY MR. CRITTON:
16 Q. Being a good neighbor?
17 MR. EDWARDS: Form.
18 THE WITNESS: -- ended up getting caught.
19 BY MR. CRITTON:
20 Q. How long has he been using drugs? Since you
21 two have been dating?
22 MR. EDWARDS: Form.
23 THE WITNESS: He has not used drugs since I
24 was pregnant with my daughter.
25

1 BY MR. CRITTON:
2 Q. Okay. Well, when did he -- when did he get
3 charged with sale of cocaine?
4 A. Over a year ago.
5 Q. Okay. Well, a year ago your daughter had
6 just been born. Your daughter is a little over a year
7 old right now; right?
8 A. Probably about two years ago.
9 Q. Two years ago what?
10 A. He was charged.
11 Q. Oh, okay. I thought you said a year ago.
12 MR. EDWARDS: Form.
13 THE WITNESS: I said over a year ago.
14 BY MR. CRITTON:
15 Q. Oh, over a year ago.
16 So how long has he been on house arrest?
17 A. One year.
18 Q. Has he been -- so he hasn't been able to
19 work?
20 A. Yes.
21 Q. He has been?
22 A. He's allowed to work.
23 Q. Oh, he got -- he gets work release?
24 A. He --
25 MR. EDWARDS: Form.

1 THE WITNESS: He makes a schedule every week
 2 of what he's going to be doing all week long.
 3 BY MR. CRITTON:
 4 Q. Okay. So he gets arrested for the sale of
 5 cocaine, but he's -- he's arrested, but at some point he
 6 got put on probation or something so he could do -- or
 7 part of his program is he gets a work release so he
 8 wouldn't have to be on house arrest; right?
 9 MR. EDWARDS: Form.
 10 THE WITNESS: He is on house arrest.
 11 BY MR. CRITTON:
 12 Q. But he can go to work?
 13 A. Yes.
 14 Q. But he doesn't have a job now?
 15 A. Not now.
 16 Q. How do you guys -- and you don't have a job
 17 right now?
 18 A. Right.
 19 Q. Okay. So how do you two support yourself --
 20 when was the last time you had work?
 21 A. Since I had my daughter.
 22 Q. Okay. So you haven't worked since June --
 23 probably before June 29th of '08; correct?
 24 A. Yes.
 25 Q. Okay. And [REDACTED] has not worked since when?

1 A. About three weeks ago.
 2 Q. When he was working at [REDACTED] and as a
 3 telemarketer, did he make enough money to support you
 4 so -- in -- in the house that you're living in?
 5 A. Yes.
 6 Q. Okay. How much did he make as a -- as a --
 7 working, washing cars at [REDACTED]?
 8 A. I'm not exactly sure. Like ten dollars an
 9 hour.
 10 Q. Does anybody help you pay towards your -- do
 11 you rent or lease -- do you rent or lease -- do you
 12 lease or pay a mortgage payment on the house?
 13 A. Rent.
 14 Q. And do you rent from someone you know?
 15 A. Yes.
 16 Q. Who?
 17 MR. EDWARDS: Form. Don't answer. Same
 18 objection that we've been going through the whole
 19 time; it's just going to identify the address.
 20 BY MR. CRITTON:
 21 Q. How much do you pay a month for rent?
 22 A. We were paying a hundred dollars every week,
 23 so that's \$400 a month.
 24 Q. Do you pay the electric, too, all utilities?
 25 A. No. We just had to pay that.

1 Q. Do you -- you rent from a family member?
 2 MR. EDWARDS: Form.
 3 THE WITNESS: Yes.
 4 BY MR. CRITTON:
 5 Q. Isn't it true, ma'am, that [REDACTED] was
 6 selling cocaine so as to help support you and himself
 7 and the child?
 8 MR. EDWARDS: Form.
 9 THE WITNESS: No.
 10 BY MR. CRITTON:
 11 Q. When is the last time you did work?
 12 A. Before I became pregnant with my daughter.
 13 Q. And where did you last work?
 14 A. [REDACTED]
 15 Q. Did you become pregnant during the time you
 16 were working at [REDACTED]?
 17 A. Yes.
 18 Q. And [REDACTED] knew you was -- you was --
 19 [REDACTED] knew you were working at [REDACTED]?
 20 A. Yes.
 21 Q. Okay. What did he think about that? He was
 22 okay with that?
 23 MR. EDWARDS: Form.
 24 THE WITNESS: No.
 25

1 BY MR. CRITTON:
 2 Q. Why did you do it, then? Why didn't you get
 3 a -- try to get another job? You were -- well, let me
 4 strike that.
 5 How long did you work at [REDACTED]?
 6 A. About six or seven months.
 7 Q. So between [REDACTED] which was about
 8 eight months, and [REDACTED] you worked about a year,
 9 like 14 to 15, 16 months, doing stripping; is that
 10 correct?
 11 A. Yes.
 12 Q. Okay. Do you plan to go back to stripping
 13 once you finish [REDACTED] -- or once you finish --
 14 once your daughter starts school?
 15 A. No, I do not.
 16 Q. You don't have any intention of going back
 17 into the stripping business?
 18 A. No, I do not.
 19 Q. When you were at [REDACTED], where was that
 20 located?
 21 A. West Palm Beach.
 22 Q. And that's the one off [REDACTED], I think
 23 you said?
 24 A. Yes.
 25 Q. Okay. And who was your boss there?

1 A. There were a few managers there. One of them
2 was named [REDACTED]
3 Q. Was he the last manager when you left, when
4 you stopped working?
5 A. Yes.
6 Q. What did you have -- what was the deal --
7 financial deal with [REDACTED]? Tips, and then you had
8 to tip the DJ and the manager again?
9 A. Yeah, but -- yeah, pretty much it was the
10 same.
11 Q. Anything different about your financial
12 arrangement there?
13 A. No.
14 Q. And in order to get that job -- well, let me
15 strike that.
16 Was [REDACTED] working there, too?
17 A. No.
18 Q. Was [REDACTED] working there?
19 A. No.
20 Q. Anyone that you knew?
21 A. Yes.
22 Q. Who?
23 A. A girl that I met at [REDACTED]
24 Q. Who was?
25 A. I don't know her real name.

1 Q. What was her stage name?
2 A. [REDACTED]
3 Q. [REDACTED]
4 MR. EDWARDS: She'll subpoena her.
5 MR. CRITTON: I'm sure you'll -- you'll
6 assert privacy rights.
7 MR. EDWARDS: Good idea.
8 BY MR. CRITTON:
9 Q. Did you do lap dances at [REDACTED]?
10 A. Yes.
11 Q. And did you do any bachelor parties at [REDACTED]
12 [REDACTED]?
13 A. No.
14 Q. Okay. Again, friction lap dances at [REDACTED]
15 [REDACTED]
16 A. Yes.
17 Q. Did they have a champagne room?
18 A. Yes.
19 Q. Same, did you use the champagne room whenever
20 you could, because you would make more money?
21 A. [REDACTED] was -- it was kind of different,
22 and I didn't do a lot of champagne rooms there. It was
23 a -- it felt a lot less safe there.
24 Q. At -- at -- at [REDACTED] did you again,
25 when you were on stage, strip down to buck naked?

1 A. Sometimes, yes.
2 Q. All right. And you'd get tips from people
3 who would put money wherever?
4 A. They would throw it on the stage --
5 Q. Okay.
6 A. -- on the floor.
7 Q. Could -- could they put money into your -- if
8 you still had your bottoms on, could they -- would you
9 allow them to put money into your G-string?
10 A. No, I wore a garter on my leg.
11 Q. Okay. Would you allow them to put money into
12 your garter?
13 A. Yes.
14 Q. Okay. And when you were dancing, did you
15 dance right down in front of the -- front of the men?
16 That is, both [REDACTED] and [REDACTED] did they
17 have a bar right -- that was adjacent to the stage, so
18 that they're -- they're sitting right at the stage
19 level?
20 A. Yes.
21 Q. All right. And so you're dancing naked in
22 front of them at times; correct?
23 A. Yes.
24 Q. Okay. And as you're dancing, you're going up
25 and down -- they have a pole there; I assume?

1 A. Yes.
2 Q. All right. So you're dancing naked, and
3 you're spreading your legs; true?
4 A. What is it -- what do you mean?
5 Q. Well, when you're dancing in front of these
6 men and you're completely naked, you're exposing all
7 parts of your body; aren't you, including your
8 genitalia?
9 A. Yes.
10 Q. All right. And you're doing that for them,
11 and you're going close to the bar where those men are
12 being seated -- where those men are seated; true?
13 A. No.
14 Q. Okay. So you never went close to the bar?
15 A. No.
16 Q. You just stayed right in the center of the
17 stage?
18 A. Yes.
19 Q. Well, if you stayed in the center of the
20 stage, how could men ever put tips into your garter?
21 A. Because it was at the calf of my leg.
22 Q. So you had to get close enough to the bar
23 that somebody could reach across and put a dollar bill
24 or a five-dollar bill or a 20, or whatever they were
25 tipping, into your garter; right?

1 A. Yes.
 2 Q. All right. So you did get close to the edge
 3 of the stage --
 4 MR. EDWARDS: Form.
 5 BY MR. CRITTON:
 6 Q. -- when you were naked; true?
 7 MR. EDWARDS: Form.
 8 BY MR. CRITTON:
 9 Q. You had to. Otherwise, their -- their arms
 10 could not have reached your garter, ma'am --
 11 MR. EDWARDS: Form.
 12 BY MR. CRITTON:
 13 Q. -- isn't that true, ma'am?
 14 A. Yes, I -- I would put my leg far enough to
 15 where they could reach it, yes. But I didn't go like
 16 right up to them in order to dance in front of their
 17 face like that.
 18 Q. On the friction dances that you did at lap --
 19 at [REDACTED] there were many occasions that you saw
 20 men get an erection; isn't that true?
 21 MR. EDWARDS: Form.
 22 THE WITNESS: No.
 23 BY MR. CRITTON:
 24 Q. Okay. Is it your testimony, neither at
 25 [REDACTED] or [REDACTED] did you ever engage in any

1 activity where you saw -- where you saw a man with an
 2 erection; is that true?
 3 A. Yes.
 4 Q. Okay. And is it your testimony, to the
 5 ladies and gentlemen of the jury, during the time that
 6 you worked at both [REDACTED] and [REDACTED] for
 7 some 14, 15, 16 months that you never engaged in any
 8 kind of sexual activity, including using your hand on a
 9 man's penis to help him ejaculate during the time you
 10 worked there?
 11 A. No, I did not.
 12 Q. And it's your -- is it your testimony that,
 13 up until the time you started seeing [REDACTED], that you
 14 had never seen a man's penis, other than Mr. Epstein?
 15 MR. EDWARDS: Object to the form.
 16 THE WITNESS: No.
 17 BY MR. CRITTON:
 18 Q. Okay. When -- when did you first see a man's
 19 penis, other than Mr. Epstein's?
 20 MR. EDWARDS: And I'm just going to place the
 21 objection that she's not going to give any names of
 22 individuals at this time to protect privacy rights
 23 of my client, as well as third parties. So I don't
 24 know if you're talking about in terms of time
 25 period --

1 MR. CRITTON: Time period for right now.
 2 MR. EDWARDS: Okay.
 3 THE WITNESS: Probably a few months after I
 4 met Jeffrey Epstein I had sex with my first
 5 boyfriend.
 6 BY MR. CRITTON:
 7 Q. And was that someone that you had dated for a
 8 lengthy period of time?
 9 A. I dated him for about a year and a half.
 10 Q. Before -- did it start before Mr. Epstein?
 11 A. Before, yes.
 12 Q. And what was this person's name?
 13 MR. EDWARDS: Object to the form.
 14 Instructing her not to answer.
 15 BY MR. CRITTON:
 16 Q. And when you say you had sex with him, that's
 17 sexual intercourse?
 18 A. Yes.
 19 Q. Okay. Did you ever have -- did you ever
 20 have -- perform oral sex on him?
 21 A. No.
 22 Q. Okay. Did you ever have any type of anal sex
 23 with him?
 24 A. No.
 25 Q. Okay. Other than this person, and we'll call

1 him Mr. A, when is the next time that you had any sexual
 2 activity with anyone? And by sexual activity, I mean
 3 where -- either intercourse, oral sex, could be anal
 4 sex, anything of that nature.
 5 A. I don't know. I was 15.
 6 Q. And how old were you when you had sex with
 7 person, Mr. A?
 8 A. I was 14.
 9 Q. You never had any sexual activity with
 10 Mr. Epstein; did you?
 11 MR. EDWARDS: Form.
 12 THE WITNESS: What do you mean?
 13 BY MR. CRITTON:
 14 Q. You never had sexual intercourse with
 15 Mr. Epstein at any time; did you?
 16 A. No.
 17 Q. You never had any type of anal sex with
 18 Mr. Epstein; did you?
 19 A. No.
 20 Q. You never performed oral sex on Mr. Epstein;
 21 did you?
 22 A. No.
 23 Q. He never performed any oral sex on you; did
 24 he?
 25 A. No.

1 Q. Therefore, you had no type of sexual activity
 2 with Mr. Epstein --
 3 MR. EDWARDS: Object to the form.
 4 BY MR. CRITTON:
 5 Q. -- at least, as I've defined it thus far;
 6 correct?
 7 MR. EDWARDS: Object to the form.
 8 THE WITNESS: He touched my --
 9 BY MR. CRITTON:
 10 Q. Go ahead. Finish your question; then I'll --
 11 or your response.
 12 A. He touched my vagina with his hand and
 13 inserted his fingers.
 14 Q. When I asked you the question, and you
 15 responded that he -- that you and Mr. Epstein never had
 16 sexual intercourse, never had any type of anal
 17 intercourse, you never had any type of -- you never
 18 performed oral sex on him, and he never performed oral
 19 sex on you, that was true with all of the visits that
 20 you ever had to Mr. Epstein's house; true?
 21 A. Yes.
 22 Q. Now, with person A, which you said you had
 23 sexual intercourse at age 14, and there was a person B.
 24 Is this another person you had a long-term relationship
 25 with, or was this a shorter relationship?

1 A. Yes, it was a shorter relationship.
 2 Q. How old were you then?
 3 A. I was 15.
 4 Q. And did you have sexual intercourse with this
 5 person?
 6 A. Yes.
 7 Q. Any oral sex, he to you or you to he?
 8 A. No.
 9 Q. Any anal sex?
 10 A. No.
 11 Q. The next person -- and I assume -- by who --
 12 who is person B?
 13 MR. EDWARDS: And my objection is the same.
 14 She's not going to give any names of these
 15 individuals.
 16 MR. CRITTON: You're instructing her not to
 17 answer?
 18 MR. EDWARDS: Yes, exactly.
 19 BY MR. CRITTON:
 20 Q. Okay. And you're going to follow whatever
 21 instruction he gives you?
 22 A. Yes.
 23 Q. All right. Who was the next person, then,
 24 you had sexual activity with --
 25 MR. EDWARDS: Same objection.

1 BY MR. CRITTON:
 2 Q. -- and how old were you?
 3 MR. EDWARDS: You can answer the second half.
 4 THE WITNESS: I was 16.
 5 BY MR. CRITTON:
 6 Q. We'll call this person -- a man, I assume,
 7 male?
 8 A. Yes.
 9 Q. We'll call this Mr. C --
 10 MR. CRITTON: -- because you're going to
 11 instruct her not to answer; right?
 12 MR. EDWARDS: Right.
 13 BY MR. CRITTON:
 14 Q. All right. And long-term relationship, or
 15 just a short?
 16 A. Yes, that was a long relationship.
 17 Q. Only sexual intercourse with him? Did you
 18 ever have oral sex with him?
 19 A. Yes.
 20 Q. Both you to he and he to you?
 21 A. Yes.
 22 Q. And that went on over a long period of time?
 23 A. Yes, until after I turned 18.
 24 Q. And why did that relationship break up?
 25 A. I -- I -- I believed he was crazy.

1 Q. Okay. Was he? You thought he was.
 2 A. Yes.
 3 Q. Okay. With person A, did you use illegal
 4 drugs with person A?
 5 A. Yes.
 6 Q. Okay. With person B, did you use illegal
 7 drugs?
 8 A. No.
 9 Q. Alcohol?
 10 A. No.
 11 Q. With A, you used both drugs and -- illegal --
 12 illegal drugs and alcohol; true?
 13 A. We both tried our firsts together. We like
 14 drank for the first time together, and --
 15 Q. Did drugs together?
 16 A. Yes.
 17 Q. All right. Person C, who you said was crazy,
 18 how long was the relationship?
 19 A. More than two years.
 20 Q. Did you do drugs with him?
 21 A. Yes.
 22 Q. Alcohol?
 23 A. No.
 24 Q. Okay. Was he a drug dealer?
 25 MR. EDWARDS: Form.

1 THE WITNESS: No.
 2 BY MR. CRITTON:
 3 Q. Did he work?
 4 A. Yes.
 5 Q. What kind of work did he do?
 6 A. He laid tile.
 7 Q. Did you live together?
 8 A. Yes.
 9 Q. Where?
 10 A. He lived in a -- in a trailer in West Palm
 11 Beach.
 12 Q. Okay. After the two, so 16 through 18,
 13 when -- during the time that you were going to
 14 Mr. Epstein's house, did you -- were you having these
 15 relations with A, B, and C?
 16 MR. EDWARDS: Form.
 17 THE WITNESS: Yes.
 18 BY MR. CRITTON:
 19 Q. Okay. Were A -- did A, B or C, or any
 20 permutation of that group, aware that you were going to
 21 Mr. Epstein's?
 22 A. No.
 23 Q. Did you tell them?
 24 A. No.
 25 Q. Why not?

1 you share that, then, with Mr. C or Mr. B, depending on
 2 who you were with at the time?
 3 A. No.
 4 Q. What did you do with your money?
 5 A. I bought clothes and things for myself.
 6 Q. When you were living with Mr. C, I think you
 7 said, did you -- where were you living, in a trailer, a
 8 house, an apartment?
 9 A. We were living in a trailer.
 10 Q. And where, what city?
 11 A. West Palm Beach.
 12 Q. Was he abusive to you in any way, either
 13 physically or verbally?
 14 A. No.
 15 Q. Did you ever have to call the police on him?
 16 A. No.
 17 Q. You're sure?
 18 A. No, I'm not sure.
 19 Q. Okay. Did he strike you -- didn't he?
 20 A. He stalked me.
 21 Q. Okay. How long --
 22 MR. EDWARDS: Is that what you asked,
 23 stalked?
 24 MR. CRITTON: I said strike.
 25 THE WITNESS: He said, did he strike.

1 A. I -- the only person that knew about it was
 2 the last person that I just told you about.
 3 Q. C?
 4 A. Yes.
 5 Q. Okay. And what did you tell him? He knew
 6 you were going to Epstein's?
 7 A. He knew that I was going somewhere.
 8 Q. How did he know? Did you tell him?
 9 A. Yes.
 10 Q. What did you tell him?
 11 A. I told him that I was going to clean house.
 12 Q. Okay. And did you -- at the time that you
 13 were dating Mr. C, did -- how much were you getting paid
 14 from Mr. Epstein?
 15 A. Usually when I went there, he -- he gave me
 16 in between two and \$300.
 17 Q. In cash?
 18 A. Yes.
 19 Q. Would he give it to you, or would someone
 20 else give it to you?
 21 A. He would set it down on the counter,
 22 sometimes he would give it to me, sometimes somebody
 23 else would give it to me. It was different a lot of the
 24 times.
 25 Q. When you were receiving the money, did -- did

1 MR. EDWARDS: Oh, okay. Sorry.
 2 MR. CRITTON: And she said stalked.
 3 MR. EDWARDS: Okay.
 4 BY MR. CRITTON:
 5 Q. Did he ever strike you?
 6 A. No.
 7 Q. When you say he stalked you, I mean did he --
 8 stalking, in my mind, is he would follow or see where
 9 you were.
 10 A. Yes. He knew things that I didn't tell
 11 anybody. He -- like I moved and lived with [REDACTED] so that
 12 he wouldn't know where I was, and he found out where I
 13 was.
 14 Q. Did he come there?
 15 A. He would like hide outside in the bushes and
 16 stuff.
 17 Q. And you knew he was out there?
 18 A. Yes.
 19 Q. Did you have to call the police and say, I've
 20 got a stalker?
 21 A. No, I never did that.
 22 Q. So were you scared of him?
 23 A. Not really.
 24 Q. Were you intimidated by him?
 25 A. No.

1 Q. Was he harassing you?
 2 A. He was harassing me.
 3 Q. Okay. I thought I -- when I asked you
 4 earlier and we were talking about, let's see, the 16 and
 5 17 year -- let's see, if you lived with Mr. C your 16
 6 through 18th year, and you were born in '88 -- 16 --
 7 that takes me to '04 through like 2006. So is that the
 8 first time you would have gone to [REDACTED]'s, when she was
 9 living in West Palm Beach, or is this another time you
 10 went to [REDACTED]'s that you didn't remember telling us
 11 about?
 12 A. No, that was the first time that I moved in
 13 with [REDACTED], then, after I left him.
 14 Q. I thought you told us you were living at your
 15 [REDACTED]'s house, and you left your [REDACTED]'s house to go
 16 live with [REDACTED].
 17 A. We were living in his trailer, and then we
 18 were living with [REDACTED].
 19 Q. So you were a 16-, 17-year-old girl, and you
 20 were living with Mr. C at [REDACTED]'s house?
 21 A. Yes.
 22 Q. What did [REDACTED] think about that?
 23 A. I don't know.
 24 Q. Well, she let you live there; didn't she?
 25 MR. EDWARDS: Form.

1 THE WITNESS: Yes.
 2 BY MR. CRITTON:
 3 Q. During the time that -- the some 20 occasions
 4 you went to Mr. Epstein's home, would it be a correct
 5 statement, Ms. Jane Doe, that he never threatened you
 6 with any type of serious harm?
 7 MR. EDWARDS: Form.
 8 THE WITNESS: Is it true that he never
 9 threatened me?
 10 BY MR. CRITTON:
 11 Q. Right. Mr. Epstein never threatened you at
 12 any time you went to his home; isn't that true?
 13 A. Yeah, that's true.
 14 Q. And he never attempted to physically restrain
 15 you; true?
 16 A. Yeah. Yeah, that's true.
 17 Q. And he never threatened you nor abused you
 18 either physically or verbally; true?
 19 A. He --
 20 Q. He never injured you physically?
 21 MR. EDWARDS: Is this a different question,
 22 or is she answering the first one?
 23 BY MR. CRITTON:
 24 Q. Yeah, let me throw it out. Let me ask it
 25 this way: He never -- never physically injured you;

1 true?
 2 MR. EDWARDS: Object to the form.
 3 THE WITNESS: He touched me.
 4 BY MR. CRITTON:
 5 Q. I understand that. But he never physically
 6 caused you harm?
 7 MR. EDWARDS: Form.
 8 THE WITNESS: I don't know what you mean by
 9 that.
 10 BY MR. CRITTON:
 11 Q. Well, he never caused an injury to you --
 12 MR. EDWARDS: Form.
 13 BY MR. CRITTON:
 14 Q. -- physical injury to you; true?
 15 A. No, he never hit me. I don't know.
 16 Q. I'm sorry?
 17 A. He never like hit me.
 18 Q. After Mr. C -- well, let me strike that.
 19 How did you get rid of Mr. C, other than you
 20 said he was a bit of a nut case, or you thought he was
 21 crazy.
 22 A. I just -- I left him. I lived with [REDACTED] for
 23 a while, and I moved back in with [REDACTED]. And I
 24 believe my uncle was living there at the time, and he
 25 just, I guess, moved.

1 Q. Okay. Well, was he still living when they
 2 moved back in, or did he tell C he had to exit the
 3 house --
 4 A. He was gone.
 5 Q. -- [REDACTED] house?
 6 A. He was gone.
 7 Q. After Mr. C, who was your next relationship
 8 with, where you had sexual activity?
 9 A. [REDACTED].
 10 Q. And during the time, since the time you
 11 started dating [REDACTED], which was in what, sometime in
 12 2007?
 13 A. Yes.
 14 Q. Okay. Has he been the only person that you
 15 have been sexually active with since Mr. C?
 16 A. Yes.
 17 Q. So if someone would testify that you were
 18 sexual -- so if someone were to testify in this case
 19 that you were sexually active at the age of 12, what
 20 would your response to that be?
 21 MR. EDWARDS: Form.
 22 THE WITNESS: That is not true.
 23 BY MR. CRITTON:
 24 Q. What was the person you had -- Mr. A, how --
 25 approximately how old was Mr. A?

1 A. He was two years older than me.
 2 Q. How about Mr. B?
 3 A. Same.
 4 Q. How about Mr. C?
 5 A. He was four years older than me.
 6 Q. Do you have any piercings?
 7 A. My ears.
 8 Q. Other than your ears?
 9 A. No.
 10 Q. Have you ever advertised for sex, any kind of
 11 sexual activity on any website?
 12 A. No.
 13 Q. When you left Mr. Epstein's house on the very
 14 first occasion and you said you and [REDACTED]. -- I'm sorry --
 15 you and [REDACTED]. were walking eastbound on the road?
 16 A. Yes.
 17 Q. All right. Because you were trying to flag
 18 down a cab.
 19 A. Yes.
 20 Q. Had a cab been called to pick you up?
 21 A. Yes.
 22 Q. And why were you walking?
 23 A. Because the cab didn't come.
 24 Q. So you thought maybe it was lost or
 25 something?

1 A. Yes.
 2 Q. And that was [REDACTED]'s idea?
 3 A. Yes.
 4 Q. And as you're walking away from Mr. Epstein's
 5 house the first time, what -- did [REDACTED]. say, well, how
 6 did it go?
 7 A. No.
 8 Q. Okay. Did you yell at [REDACTED].?
 9 A. No.
 10 Q. Were you angry with [REDACTED].?
 11 A. No.
 12 Q. Did you say anything to [REDACTED]. as to what went
 13 on between -- excuse me -- after she had left?
 14 A. No.
 15 Q. Why not?
 16 A. Because I didn't feel comfortable talking
 17 about it.
 18 Q. Well, this is -- this is the girl who, based
 19 on what you've told us, is would be your belief that
 20 [REDACTED]. misled you?
 21 MR. EDWARDS: Form.
 22 THE WITNESS: What do you mean?
 23 BY MR. CRITTON:
 24 Q. What occurred at -- what you say occurred at
 25 Epstein's house, is that what you thought the deal was?

1 That is, that's what you thought was going to happen,
 2 based on what [REDACTED]. had told you?
 3 A. No.
 4 Q. Okay. Was it substantially different than
 5 what you thought [REDACTED]. had told you would happen?
 6 A. Yes.
 7 Q. Okay. In fact, you said you didn't think you
 8 would have to take your clothes off at all.
 9 A. Yes.
 10 Q. All right. And you weren't even sure that
 11 you'd have to give anyone a massage, because you
 12 thought, based on what you told us, is that [REDACTED]. said,
 13 I'll give you 200 bucks, just come with me?
 14 A. Yes.
 15 Q. Come with me to the house; right?
 16 A. Yes.
 17 Q. So what, from your perspective, it was hugely
 18 different, at least based on what you've told us from
 19 what [REDACTED]. said you should expect or what you thought was
 20 going to happen; correct?
 21 A. Yes.
 22 Q. So weren't you ticked off at her; weren't you
 23 angry with her?
 24 A. I don't know what to say.
 25 Q. Okay. Well, why not? You've been -- you've

1 been angry before. I mean, you -- you testified in
 2 court, you testified on depositions you had been a
 3 runaway, you know, you know how to pick up and leave if
 4 circumstances were not good at a particular house. You
 5 had a vast experience in taking care of yourself, to
 6 some extent, so why didn't you say to [REDACTED]. something
 7 like, what did you get me into, or what happened, or
 8 what was going on? Did you show any emotion at all to
 9 [REDACTED].?
 10 MR. EDWARDS: Form.
 11 THE WITNESS: No.
 12 BY MR. CRITTON:
 13 Q. So you just got in the car -- did you go in a
 14 cab? I gather -- gather a cab came?
 15 A. Yes.
 16 Q. Okay. Cab came. You get in the car. You
 17 and [REDACTED]. aren't talking at all?
 18 A. I don't remember any conversation that we
 19 had, no.
 20 Q. What did you tell the FBI? Didn't the FBI
 21 say, what do you mean you didn't say anything to [REDACTED].?
 22 MR. EDWARDS: Form.
 23 THE WITNESS: They didn't say that to me.
 24 BY MR. CRITTON:
 25 Q. Okay. And then did you tell them that [REDACTED].

1 made 200 bucks off of you, or made money off bringing
2 you there?
3 A. Yes.
4 Q. Okay. Did they -- did they tell you, the FBI
5 tell you that if she's making money off of you; she's
6 like your pimp? Did they say that to you?
7 MR. EDWARDS: Form.
8 THE WITNESS: No.
9 BY MR. CRITTON:
10 Q. Okay. Do you know -- do you know what a pimp
11 is?
12 A. Not really.
13 Q. Okay. Do you know that's someone who makes
14 money off of -- off of you for taking you someplace
15 where you might make money?
16 MR. EDWARDS: Object to the form.
17 THE WITNESS: Why me?
18 BY MR. CRITTON:
19 Q. Pardon?
20 A. Why me?
21 Q. What do you mean, why you?
22 A. What do you mean me?
23 Q. You -- well --
24 A. I don't have a pimp.
25 Q. I'm sorry?

1 A. I don't have a pimp.
2 MR. EDWARDS: Form.
3 BY MR. CRITTON:
4 Q. You know, well, isn't [REDACTED] -- wasn't [REDACTED]
5 your pimp?
6 MR. EDWARDS: Form.
7 BY MR. CRITTON:
8 Q. Didn't she take you there?
9 MR. EDWARDS: Form.
10 THE WITNESS: No, she is not my pimp.
11 BY MR. CRITTON:
12 Q. Well, what is she, then? If she's made money
13 off taking you to Mr. Epstein's, what would you call it?
14 A. Not my pimp.
15 Q. Wasn't your friend; was she? Because she
16 misled you; didn't she?
17 A. She probably didn't know that's what she was
18 doing at the time.
19 Q. She didn't know she was doing what?
20 A. What she was doing.
21 Q. How could she not know what she was doing?
22 A. Because she was as young as I was.
23 Q. Okay. Well, how many times had [REDACTED] been
24 there?
25 MR. EDWARDS: Form.

1 THE WITNESS: I do not know.
2 BY MR. CRITTON:
3 Q. Did you ever ask her how many times she had
4 been at Epstein's home --
5 A. Never.
6 Q. -- before she ever took you?
7 A. No.
8 Q. Did she ever tell you what -- at any time
9 after the first time that you were at Epstein's home,
10 did she ever tell you how many times she had been there?
11 A. No.
12 Q. Did she ever tell you that she had brought
13 anyone from 20 to 80 people to Mr. Epstein's home, by
14 her own testimony?
15 A. No.
16 Q. Okay. Is that news to you, as I say that to
17 you today?
18 A. Yes.
19 Q. So what -- so you don't remember anything
20 that you and [REDACTED] talked about on the way home?
21 A. No.
22 Q. And what did you do with the money that
23 you -- that you got, the 200 bucks?
24 A. I bought clothing and things that I wanted.
25 Q. Did [REDACTED] ever ask you to go back to

1 Mr. Epstein's home again?
2 A. No.
3 Q. When you -- how did you end up going back to
4 Mr. Epstein's home again?
5 A. I gave him my phone number, and he called me.
6 Q. I'm sorry?
7 A. I gave him my phone number, and I got a call
8 from either him, [REDACTED] or [REDACTED].
9 Q. Did you meet [REDACTED] the very first time you
10 were there? I think you said you only met like the
11 blond-headed girl, who subsequently you identified as
12 [REDACTED].
13 MR. EDWARDS: Form.
14 THE WITNESS: No, I did not meet [REDACTED] the
15 first time I was there.
16 BY MR. CRITTON:
17 Q. Okay. And did someone ask -- did Mr. Epstein
18 ask you for your phone number?
19 A. Yes.
20 Q. When you were upstairs, or when you were
21 downstairs?
22 A. When I was upstairs.
23 Q. And this is you, first time you were there,
24 you've never taken your clothes off -- at least that's
25 what you've told us -- in front of any male before, you

1 take your clothes off, you give him his massage, you
2 described what occurred that first occasion, he asked
3 for your phone number, and you give it to him?

4 MR. EDWARDS: Form.

5 THE WITNESS: He only told me what to do. He
6 never asked. So I felt like I had to do it --

7 BY MR. EDWARDS:

8 Q. Okay. Well --

9 A. -- so I did.

10 Q. You had no obligation to do anything when you
11 were there, ma'am; did you?

12 MR. EDWARDS: Form.

13 THE WITNESS: I felt as if I did.

14 BY MR. CRITTON:

15 Q. Okay. So when you -- when he then -- but
16 whatever you did was completely voluntary on your part?

17 A. Form.

18 Q. You could either do it or not? You could
19 have just said, I'm out of here?

20 MR. EDWARDS: Form.

21 THE WITNESS: I only felt like I had to do it
22 because he told me to. He never asked anything.
23 He only would tell me.

24 BY MR. CRITTON:

25 Q. Well, [REDACTED] told you what to do. [REDACTED] told

1 BY MR. CRITTON:

2 Q. Okay. Well, you -- just a minute ago you
3 said, I knew she was bringing other people. Now, did
4 you know she was bringing other people before she
5 brought you?

6 A. Not before she brought me.

7 Q. Okay. Did you find out afterwards that [REDACTED]
8 had brought a lot of other people?

9 A. No, I only assumed.

10 Q. Okay. Well, did you ever ask [REDACTED] --

11 A. No.

12 Q. -- whether she had brought other people?

13 A. No.

14 Q. Okay. So you don't -- you didn't know
15 whether she had brought anyone else, and you didn't know
16 what she was thinking, because you never asked her; did
17 you?

18 A. No.

19 Q. So when Mr. Epstein said, could I have your
20 phone number, you had to voluntarily give it to him,
21 because otherwise he couldn't have gotten it; true?

22 MR. EDWARDS: Form.

23 BY MR. CRITTON:

24 Q. You could have given him any number.

25 MR. EDWARDS: Form. I would just ask that

1 you to take your clothes off.

2 A. He told me to take my clothes off.

3 Q. You know, then you said that you looked at
4 [REDACTED], and [REDACTED] was taking her clothes off, and she said,
5 we need to take our clothes off.

6 A. [REDACTED] said that it was okay, yes.

7 Q. All right. So, but for [REDACTED] being there, you
8 never would have taken your clothes -- number one, if it
9 weren't for [REDACTED], you never would have been there; would
10 you?

11 A. [REDACTED] was already convinced that it was okay.

12 Q. How do you know that she was convinced that
13 it was okay? You said you and --

14 A. Because obviously --

15 Q. -- you said you never really talked about it.

16 A. -- obviously, she was bringing --

17 Q. So you --

18 A. -- other people there.

19 Q. Well, you didn't know that. I just asked you
20 that a minute ago, whether you knew she -- whether you
21 knew she was bringing anybody else. And you said you
22 didn't know whether she had ever brought anyone else.

23 MR. EDWARDS: Form.

24 THE WITNESS: Well, she brought me.
25

1 you allow the witness to answer your question.

2 BY MR. CRITTON:

3 Q. All right. You chose -- you voluntarily gave
4 Mr. Epstein your phone number; didn't you?

5 MR. EDWARDS: Form.

6 THE WITNESS: He told me to give it to him,
7 so I did, yes.

8 BY MR. CRITTON:

9 Q. You could have given him any number in the
10 whole world. You didn't have to give him your number.
11 How would he know?

12 A. I don't know.

13 Q. So he asked, and you gave it to him
14 voluntarily; true?

15 MR. EDWARDS: Form.

16 THE WITNESS: Yes.

17 BY MR. CRITTON:

18 Q. Okay. Now, Ms. Jane Doe, when you gave him
19 your phone number, I think you said that you told [REDACTED]
20 that you had given him your phone number?

21 A. No.

22 Q. Okay. Did [REDACTED] ever come to you and say,
23 hey, would you like to go back to Epstein's house again?

24 A. Yes.

25 Q. Okay. When did she do that?

1 A. I don't remember.
 2 Q. How much time passed?
 3 A. I don't remember.
 4 Q. A week? A month? Six months?
 5 A. I don't remember.
 6 Q. And what did you say? When -- what did you
 7 say to [REDACTED] when she said, would you like to go back to
 8 the house with me?
 9 A. I don't -- I don't remember.
 10 Q. Well, did you mislead her? Did you say, no,
 11 I -- I don't want to go back?
 12 A. No.
 13 Q. Did you tell her, I'm going back on my own?
 14 Well, let me ask you this: Had you -- strike
 15 the last question.
 16 Had you gone back to Mr. Epstein's house in
 17 between the first time and the time that [REDACTED] next asked
 18 you?
 19 A. Yes.
 20 Q. Okay. How many times had you been back as --
 21 how much time transpired between the first time and the
 22 second time you went to Mr. Epstein's home?
 23 A. I am not sure.
 24 Q. Was it a week? A month? A day?
 25 A. I don't know who -- maybe a week or two.

1 Q. All right. And then I think you told me
 2 someone called you, some -- a female called you.
 3 A. Sometimes [REDACTED] called me, and once in a
 4 while Jeffrey called me himself.
 5 Q. Okay. Mr. Epstein never called you directly;
 6 did he?
 7 A. Yes.
 8 Q. You said you went to his house
 9 approximately -- approximately 20 times --
 10 A. Yes.
 11 Q. -- during the -- during the time span that
 12 you identified earlier.
 13 A. Yes.
 14 Q. All right. Would the vast majority of times
 15 that he called you -- I'm sorry -- that you were called,
 16 either [REDACTED] or [REDACTED] made the call?
 17 A. Yes.
 18 Q. Okay. On how many occasions, your best
 19 recollection, did Mr. Epstein ever call you?
 20 A. One. Maybe two.
 21 Q. And on the one or two occasions that
 22 Mr. Epstein ever called you, did he ask you whether
 23 you'd want to come over? What did he say?
 24 COURT REPORTER: I didn't hear any response.
 25 MR. CRITTON: Oh, I'm sorry.

1 COURT REPORTER: "Did he ask you whether
 2 you'd want to come over?" I didn't hear your
 3 response, if you answered.
 4 THE WITNESS: Yes.
 5 BY MR. CRITTON:
 6 Q. And that one or two occasions that he called
 7 you, he basically said, do you want to come over?
 8 MR. EDWARDS: Form.
 9 THE WITNESS: He -- I don't remember exactly
 10 what he said to me. But, normally, when [REDACTED] or
 11 [REDACTED] called me they would call me ahead of time
 12 and tell me that Jeffrey was going to be in town,
 13 would I like to come over.
 14 BY MR. CRITTON:
 15 Q. Right. And that was the extent of the
 16 conversation?
 17 A. They would tell me --
 18 Q. You would say yes or no?
 19 A. Yes. And they would tell me what day and
 20 what time to be there.
 21 Q. All right. And you understood that
 22 Mr. Epstein has a residence in Palm Beach?
 23 A. Yes.
 24 Q. And you understood that he had residences in
 25 other places?

1 A. Not at the time.
 2 Q. Okay. And you just thought he lived full
 3 time in West Palm Beach -- or in Palm Beach?
 4 A. No, I -- I knew that he went out of town a
 5 lot.
 6 Q. All right. So you knew that he went out of
 7 town for business, as well as doing business here in
 8 Palm Beach?
 9 MR. EDWARDS: Form.
 10 THE WITNESS: I have no idea what he was
 11 going out of town for.
 12 BY MR. CRITTON:
 13 Q. Okay. Did you ever know what his business
 14 was?
 15 A. No.
 16 Q. All right. Was -- during the time that you
 17 ever gave a message to Mr. Epstein, did he -- was he on
 18 the phone?
 19 A. Yes.
 20 Q. Okay. And often would he be doing what
 21 appeared to be business over the phone while you were
 22 giving him a message -- or engaging in conversations
 23 with someone?
 24 A. Yes.
 25 Q. All right. And did it appear from time to

1 time that he was engaged in business?
 2 MR. EDWARDS: Form.
 3 THE WITNESS: Sometimes, yes.
 4 BY MR. CRITTON:
 5 Q. All right. And you understood that -- at
 6 least you understood that his main residence was in,
 7 from what you understood during the time that you went
 8 there, his main residence was in Palm Beach, Florida,
 9 and that he would just travel out of town, and then come
 10 back into town occasionally, you know, he would travel
 11 out of town occasionally, but basically lived in Palm
 12 Beach?
 13 A. I did not know. I really...
 14 Q. You said that was the only residence that
 15 you -- or the only place that you understood that he
 16 lived?
 17 A. That's the only place that I knew of, but
 18 I -- I didn't know, you know, what he was doing when he
 19 was going out of town or whatever he was doing.
 20 Q. But you knew he had -- he -- that was his
 21 home, at least one of his homes?
 22 A. I knew that he lived there.
 23 Q. All right. You never traveled anyplace with
 24 Mr. Epstein; did you?
 25 A. No.

1 discussed; was it?
 2 MR. EDWARDS: Form.
 3 THE WITNESS: No.
 4 BY MR. CRITTON:
 5 Q. Okay. And the one or two times that
 6 Mr. Epstein ever called you, the subject of -- of any
 7 type of engaging in any type of sexual conduct was never
 8 discussed; was it?
 9 A. No -- yes, it was, actually.
 10 Q. Well, ma'am, you said, no; then you said,
 11 yes. What is it? What's the answer?
 12 A. Yes, he did discuss with me that he would pay
 13 me extra money for having sex with him.
 14 Q. Did you tell the FBI that?
 15 A. Yes. And he -- he tried to, I guess,
 16 convince me to do it by telling me that -- his exact
 17 words to me were that he used to fuck [REDACTED] all the time.
 18 Q. When did -- when did this call purportedly
 19 take place?
 20 A. I was at his house, and...
 21 Q. At his house?
 22 A. Yes.
 23 Q. What were you doing at his house?
 24 A. I was giving him a massage.
 25 Q. Oh, I thought -- okay. Maybe you

1 Q. You never accompanied him on any trip; did
 2 you?
 3 A. No.
 4 Q. Mr. Epstein never text -- text'd you by
 5 phone; did he?
 6 A. No.
 7 Q. Mr. Epstein never e-mailed you or sent you
 8 any type of mail; did he?
 9 A. No.
 10 Q. Neither [REDACTED] nor [REDACTED] or anyone who worked
 11 for Mr. Epstein ever text'd you by phone; did they?
 12 A. No.
 13 Q. They never sent you anything by e-mail or by
 14 mail; did they?
 15 A. No.
 16 Q. Okay. And when they -- they, either [REDACTED] or
 17 [REDACTED] or whoever else may have called, other than
 18 Mr. Epstein, they basically said, Jeffrey's in town,
 19 would you like to come over?
 20 A. Yes.
 21 Q. And then they would give you a time?
 22 A. Yes.
 23 Q. And at no time in any conversation with [REDACTED]
 24 or [REDACTED] or anyone who worked for Mr. Epstein was the
 25 subject of engaging in any type of sexual conduct ever

1 misunderstood my question.
 2 When Mr. Epstein -- the one or two times that
 3 you ever spoke with Mr. Epstein over the phone, okay,
 4 the subject of engaging in any type of sexual activity
 5 or conduct never occurred; did it?
 6 MR. EDWARDS: Form.
 7 THE WITNESS: Not over the phone.
 8 BY MR. CRITTON:
 9 Q. I'm sorry?
 10 A. Not --
 11 Q. Not over the phone?
 12 A. -- over the phone.
 13 Q. All right. And neither [REDACTED] [REDACTED], nor
 14 [REDACTED], or anyone else, including Mr. Epstein, ever
 15 attempted to persuade or to induce or to entice you into
 16 any type of sexual conduct during any phone
 17 communication; true?
 18 A. Yes, that's true.
 19 Q. Did you ever bring anyone to Mr. Epstein's
 20 house?
 21 A. No.
 22 Q. Do you know a person named [REDACTED] who's your
 23 cousin?
 24 A. [REDACTED].
 25 Q. [REDACTED].?

1 A. Yes.
 2 Q. Did you bring [REDACTED] -- you know -- you're
 3 aware Amanda [REDACTED] went to Mr. Epstein's home?
 4 A. Yes. I did not bring her, though.
 5 Q. And she was 19 or 20 when she went; isn't
 6 that true?
 7 A. Yes.
 8 Q. Okay. And who took or asked Amanda [REDACTED] to
 9 go to Mr. Epstein's home?
 10 A. I believe it was [REDACTED] or [REDACTED].
 11 Q. And how did you find out that [REDACTED], your
 12 cousin, went to Mr. Epstein's home?
 13 A. I don't remember. Either she told me, or
 14 [REDACTED] told me, or [REDACTED] told me.
 15 Q. And did you ever talk with [REDACTED] about what
 16 she did at Mr. Epstein's home?
 17 A. No.
 18 Q. Was she aware -- she, [REDACTED], aware that you
 19 went?
 20 A. I don't think so.
 21 Q. And you're aware she went, but you never
 22 raised the topic with her?
 23 A. Right.
 24 Q. By the way, who -- who knows that you are a
 25 Plaintiff in the action, Jane Doe versus Epstein? [REDACTED]

1 knows; right?
 2 MR. EDWARDS: Object to the form.
 3 BY MR. CRITTON:
 4 Q. First you need to answer that question. [REDACTED]
 5 knows you're a Plaintiff; right?
 6 MR. EDWARDS: Object to the form.
 7 THE WITNESS: Yes.
 8 BY MR. CRITTON:
 9 Q. Okay. [REDACTED] knows you're a Plaintiff?
 10 MR. EDWARDS: Form.
 11 THE WITNESS: Yes.
 12 BY MR. CRITTON:
 13 Q. Does [REDACTED] know --
 14 A. Yes.
 15 Q. -- you're a Plaintiff?
 16 A. Yes.
 17 Q. Does [REDACTED] know you're a Plaintiff?
 18 A. Yes.
 19 Q. Does your mother know you're a Plaintiff?
 20 A. I don't know.
 21 Q. Did you tell your dad, [REDACTED]?
 22 A. No.
 23 Q. So he's unaware that you're -- you have a
 24 lawsuit that's going?
 25 A. No -- he is unaware, yes.

1 Q. How about your sister, [REDACTED]?
 2 A. I haven't told her myself, but I'm sure that
 3 she knows, because other people have gone to her house.
 4 Q. Okay. Other people have told her, or other
 5 people have just asked her questions?
 6 MR. EDWARDS: Form.
 7 THE WITNESS: I don't know what she was told.
 8 BY MR. CRITTON:
 9 Q. Okay. How about [REDACTED], your sister, [REDACTED],
 10 does she know you're a Plaintiff in this lawsuit --
 11 A. No.
 12 Q. -- or any lawsuit?
 13 A. No.
 14 Q. Okay. Have you sold or agreed to assign any
 15 portion of any recovery to anyone?
 16 MR. EDWARDS: Form.
 17 THE WITNESS: No.
 18 BY MR. CRITTON:
 19 Q. Your psychologist, [REDACTED], he knows
 20 you're a Plaintiff in a lawsuit?
 21 A. Yes.
 22 Q. Okay. Who else knows you're a Plaintiff in a
 23 civil lawsuit against Mr. Epstein?
 24 A. I don't know.
 25 Q. Any of your other friends know?

1 A. No.
 2 Q. Okay. Are you aware that if, in fact, this
 3 case is not resolved, you may well -- the case may be
 4 tried, and your anonymity may no longer exist --
 5 MR. EDWARDS: Form.
 6 BY MR. CRITTON:
 7 Q. -- because everyone may know that you're the
 8 Plaintiff, Jane Doe, against Mr. Epstein; do you
 9 understand that fact?
 10 MR. EDWARDS: Form.
 11 THE WITNESS: Yes.
 12 BY MR. CRITTON:
 13 Q. I think you told me you never brought any
 14 other girls to Mr. Epstein's home?
 15 A. No.
 16 Q. Okay. After you said [REDACTED] asked you if
 17 you -- if you would like to go back to Mr. Epstein's --
 18 to Mr. Epstein's house, but you had already been back in
 19 the interim; true?
 20 A. Yes.
 21 Q. Okay. And who -- [REDACTED] or someone else had
 22 called you and asked you if you wanted to come back?
 23 A. Yes.
 24 Q. And where were you living at the time?
 25 A. With [REDACTED].

1 Q. Who drove you to Mr. Epstein's house?
 2 A. Cab.
 3 Q. When the person called and asked whether you
 4 want -- whether you wanted to come back, what did you
 5 say?
 6 A. At first I didn't go.
 7 Q. Okay. So the call -- [REDACTED] or whoever
 8 called, and you said, I'm not interested.
 9 A. Yes.
 10 Q. All right. And did you say, don't call me
 11 again?
 12 A. No.
 13 Q. Why not?
 14 A. I didn't think to say something like that.
 15 Q. And did you get another call?
 16 A. Yes.
 17 Q. And you had a cell phone at the time?
 18 A. Yes.
 19 Q. And what cell phone number was that? Was
 20 that the 584?
 21 A. No. I don't remember the entire number. It
 22 was a number that started with 352, though.
 23 Q. That's the 352 one you don't remember?
 24 A. Uh-huh.
 25 Q. But cell phones pop up a number, so you -- do

1 you remember what number that would be called -- that
 2 is, the number that would be calling you --
 3 A. Yes.
 4 Q. -- from the Epstein home?
 5 A. Yes.
 6 Q. That number you do remember? What was the
 7 number?
 8 A. I don't -- it was always a different number,
 9 and it normally started with 688.
 10 Q. Why did you answer it?
 11 A. I didn't know who it was.
 12 Q. Okay. So I assume you knew how to do voice
 13 messages, voice mail; right?
 14 A. I just answered it.
 15 Q. My question is, is: Why didn't you just
 16 let -- if you weren't sure who the number was, a lot of
 17 people just let the phone ring, go to voice mail. Then
 18 if you want to call them back, you call them back. If
 19 you don't want to call them back, you don't have to.
 20 MR. EDWARDS: Form.
 21 THE WITNESS: Because I wanted to know who it
 22 was.
 23 BY MR. CRITTON:
 24 Q. Okay. So they called, and who was it? [REDACTED]
 25 again, or someone?

1 A. Yes.
 2 Q. And she said, you know, I know you couldn't
 3 come last time. How about coming this. Would you like
 4 to come?
 5 A. Yes.
 6 Q. And did you say, no, not interested anymore,
 7 don't call me anymore?
 8 A. No.
 9 Q. Okay. So [REDACTED] called a second time, and you
 10 said what?
 11 A. She told me that she -- that Jeffrey needed
 12 me to come, because he didn't have anybody else who
 13 could come. So I came.
 14 Q. How was that your problem?
 15 A. It wasn't.
 16 Q. All right. So she said that -- she said what
 17 you just described, and you made a conscious decision
 18 that you would go back to Mr. Epstein's home?
 19 MR. EDWARDS: Form.
 20 THE WITNESS: Yes.
 21 BY MR. CRITTON:
 22 Q. Right. And you voluntarily chose to go back
 23 to his house a second time?
 24 A. Yes.
 25 Q. No one forced you; correct?

1 A. Correct.
 2 Q. Okay. And it was your choice. That is, you
 3 could have said, sorry, I'm not going back to the
 4 Epstein home. Didn't enjoy the experience. Wasn't a
 5 good experience. I'm done. You could have done that;
 6 couldn't you?
 7 A. I didn't think of doing that, no.
 8 Q. Sure you thought of it, because the first
 9 phone call that you got from [REDACTED] you said, no, I'm not
 10 going. So you had to have consciously thought is, I
 11 don't want to go again; right?
 12 A. No.
 13 Q. I'm sorry?
 14 A. No.
 15 Q. No what?
 16 A. That wasn't my thought.
 17 Q. But your first thought was, when she called
 18 you the first time was, is, I don't want to go back;
 19 right?
 20 A. No.
 21 Q. Okay. So after the first time that you went,
 22 you had already made up your mind you would go again, if
 23 they called?
 24 A. No.
 25 Q. So what changed your mind?

1 A. It's -- it wasn't that my mind was changed.
 2 I just, I just didn't go the first time. I don't know
 3 why. I was probably doing something; that's probably
 4 why. The only reason I ever went back was because he
 5 made me feel like I was obligated to keep going.

6 Q. Why? What obligation did you have to go to
 7 Mr. Epstein's?

8 A. I didn't. He was like just very demanding,
 9 and he just -- he just told me what to do, and I just
 10 felt like I needed to do it.

11 Q. Well, you were able to get away from your
 12 stalking boyfriend; right? That wasn't a problem for
 13 you?

14 MR. EDWARDS: Form.

15 THE WITNESS: He, he still calls me today,
 16 so, yeah, it is a problem for me.

17 BY MR. CRITTON:

18 Q. That you were -- well, you were able to run
 19 away from [REDACTED] house and your mother's house at
 20 various times and to live with somebody else, before you
 21 ever met Mr. Epstein; true?

22 A. I ran away from my mother's house, yes.

23 Q. Okay. And you -- you were strong enough to
 24 do that, and you knew, at least in your own mind, what
 25 you wanted to do. You had a mind of your own at that

1 you?

2 A. It was not an option that I thought that I
 3 had.

4 Q. Why?

5 A. Because I was too young to understand.

6 Q. Well, you were young enough to run away from
 7 your mother's house, you understood that, and to go to
 8 what you considered to be a safe place at -- was it
 9 [REDACTED] house?

10 A. Yes.

11 Q. All right. You understood that; right?

12 A. Yes.

13 Q. Okay. You were -- you understood enough that
 14 you gave varying testimony during the trial and various
 15 depositions of your father to either help him or hurt
 16 him, depending on who was influencing you; right?

17 MR. EDWARDS: Form.

18 THE WITNESS: And during that time I had no
 19 idea what I was doing.

20 BY MR. CRITTON:

21 Q. All right. And you knew when [REDACTED] or
 22 whoever called, called you and said, you know, would you
 23 like to come back, you could say yes or no. It was that
 24 simple.

25 MR. EDWARDS: Form.

1 point; true?

2 MR. EDWARDS: Form.

3 THE WITNESS: I didn't have a choice but to
 4 leave at the time.

5 BY MR. CRITTON:

6 Q. All right. Well, you had a choice either to
 7 go back to Mr. Epstein's or not to go back to
 8 Mr. Epstein's. You had to first say, yes, to the person
 9 who called; correct? You had a choice: I'll say yes,
 10 or I'll say no. I'm living out west of town.
 11 Mr. Epstein lives in, you know, Palm Beach. He's got no
 12 hold over me; right? He had no hold over you.

13 MR. EDWARDS: Form.

14 THE WITNESS: Yes, but I just knew that they
 15 would continue to call me.

16 BY MR. CRITTON:

17 Q. So call the police. Why didn't you call the
 18 police? You knew how to get ahold of the police; right?

19 A. That wasn't the --

20 Q. You'd had issues with the police before?

21 MR. EDWARDS: Form.

22 THE WITNESS: That was not the first thing I
 23 thought of.

24 BY MR. CRITTON:

25 Q. But it was an option that was available to

1 THE WITNESS: It was more like, could you
 2 please come back.

3 BY MR. CRITTON:

4 Q. Okay. So, so they said, please. You could
 5 say, thanks, but no thanks. You had said, thanks, but
 6 no thanks, before; right?

7 A. I didn't know. I didn't know --

8 Q. Sure you --

9 A. -- that that was an option.

10 Q. Sure you did, because --

11 A. Oh, you did?

12 Q. Yeah. Because when you were in school at
 13 both -- in eighth grade, that you repeated, and then
 14 when you were at Pace, you made decisions not to go to
 15 school and to remain truant from school; didn't you?

16 A. That's because I could not go to school.

17 Q. Why not?

18 A. It was not an option for me.

19 Q. Why?

20 A. Because I was being abused at my mother's
 21 house.

22 Q. By?

23 A. And if I went back -- if I went to school,
 24 then that would mean going back to my mom's.

25 Q. Okay. Who was abusing you at your mother's

1 house?
 2 A. My mother.
 3 Q. Okay. And how was she abusing you?
 4 A. She wasn't feeding me.
 5 Q. Did you tell [REDACTED] that?
 6 A. Yes.
 7 Q. And that's why you went to live with [REDACTED]
 8 [REDACTED] ?
 9 A. Yes.
 10 Q. Okay. And she wasn't feeding you. Did --
 11 were -- had you ever been abused by your father or by
 12 Mr. Veet?
 13 A. No.
 14 Q. Okay. Did any family member, other than your
 15 mother, ever physically abuse you?
 16 A. Yes.
 17 Q. Who?
 18 A. My uncle.
 19 Q. Which uncle?
 20 A. [REDACTED].
 21 Q. [REDACTED] ?
 22 A. Yes.
 23 Q. How did he abuse you? How old were you, and
 24 how did he abuse you?
 25 A. I don't know. I was probably like 15, and he

1 A. No.
 2 Q. Did you tell your [REDACTED] ?
 3 A. Yes.
 4 Q. And what did she say?
 5 A. I don't remember.
 6 Q. Did she call the police?
 7 [REDACTED]
 8 Q. Police come?
 9 A. Yes.
 10 Q. What did they do?
 11 A. They didn't do anything.
 12 Q. Did you have any physical marks?
 13 A. Yes.
 14 Q. Okay. What did you have? Where did he hit
 15 you? Did he hit you in the nose? What part of your
 16 face did he hit?
 17 A. I had a bump on my head somewhere. I'm
 18 not -- I don't remember where it was.
 19 Q. But he hit you with his fist?
 20 A. Yes.
 21 Q. Did you leave the house after that?
 22 A. No, he did, because I called the police.
 23 Q. Did he ever come back?
 24 A. Yes.
 25 Q. Did you consider that a pretty traumatic

1 hit me.
 2 Q. Where did he hit you?
 3 A. He punched me in the face.
 4 Q. Was he drunk? Was he on drugs, Jane Doe?
 5 A. I don't know.
 6 Q. Where were you at the time?
 7 A. I was in my bedroom.
 8 Q. Okay. And did he come into your bedroom?
 9 A. I was walking out.
 10 Q. And he just cold-cocked you?
 11 A. We were arguing.
 12 Q. What were you arguing about?
 13 A. I don't remember.
 14 Q. And he punched you right in the face?
 15 A. Yes.
 16 Q. Did he break anything?
 17 A. No.
 18 Q. Did you have to go to the hospital?
 19 A. No.
 20 Q. You were living where, at your [REDACTED]
 21 house then?
 22 A. Yes.
 23 Q. Did you get knocked down?
 24 A. No.
 25 Q. Were you knocked out?

1 event, to have an uncle haul off and hit you in the
 2 face?
 3 MR. EDWARDS: Form.
 4 THE WITNESS: No.
 5 BY MR. CRITTON:
 6 Q. Didn't consider that to be traumatic at all?
 7 MR. EDWARDS: Form.
 8 THE WITNESS: Not really.
 9 BY MR. CRITTON:
 10 Q. Okay. Had anybody else ever hit you in the
 11 face like that?
 12 A. My sisters.
 13 Q. [REDACTED] and [REDACTED] ?
 14 A. And my brother, yes.
 15 Q. Which brother?
 16 A. I only have one brother.
 17 Q. What's his name?
 18 A. [REDACTED].
 19 Q. It's [REDACTED]. Is [REDACTED] in jail?
 20 A. Not right now.
 21 Q. He's been in jail, though, before?
 22 A. Yes.
 23 Q. Is it [REDACTED] ?
 24 A. [REDACTED].
 25 Q. Where does the [REDACTED] come from?

1 A. My mother.
 2 Q. Are there any -- is he a -- is he a [REDACTED]
 3 child?
 4 A. Yes.
 5 Q. What's he been in jail for?
 6 A. Robbery.
 7 Q. On how many occasions?
 8 A. I don't know.
 9 Q. Are you close to your brother?
 10 A. Somewhat.
 11 Q. When is the last time he was in jail?
 12 A. I don't know.
 13 Q. Do you consider it traumatic that your
 14 brother was in jail?
 15 MR. EDWARDS: Form.
 16 THE WITNESS: He put himself in jail.
 17 BY MR. CRITTON:
 18 Q. So he -- he basically made his bed, and then
 19 he slept in it?
 20 A. Yes.
 21 Q. Is that the way you feel about your dad, too?
 22 A. Yes.
 23 Q. It was his choice to, to assault a young boy,
 24 and as such, he's paying the penalty?
 25 A. Yes, that's the way I feel now about it.

1 Q. In your earlier years were you torn, because
 2 he was your father?
 3 A. I was very confused, yes.
 4 Q. And I've seen on various medical records that
 5 you consider yourself to be suffering from, even today,
 6 post traumatic stress syndrome that related to that --
 7 MR. EDWARDS: Form.
 8 BY MR. CRITTON:
 9 Q. -- related to that, that is your father
 10 murdering [REDACTED].
 11 A. Yes.
 12 Q. Any other family member ever physically
 13 assault you?
 14 A. No.
 15 Q. Other -- other than your uncle and you said
 16 the fights that you got in with your sisters and your
 17 brothers. I assume those were more sister/brother type
 18 fight, or were they real fight-fights?
 19 A. Both.
 20 Q. So you got into some real fights -- real
 21 physical fights with your sisters and your brother?
 22 A. Yes.
 23 Q. Where people were hurt?
 24 A. Not --
 25 Q. Black eyes? Blood?

1 A. Yeah. Not bad enough to go to the hospital
 2 or anything.
 3 Q. Police ever called?
 4 A. No.
 5 Q. Did anyone ever attempt to rape you?
 6 A. No.
 7 Q. Has anyone ever attempted to molest you?
 8 A. No.
 9 Q. Okay. You go back to Mr. Epstein's house the
 10 second time. You had their phone number; right?
 11 A. No.
 12 Q. Well, you had it, because it showed up on
 13 your phone?
 14 A. I had seen it.
 15 Q. Right. But all you have to do is go back to
 16 recent calls; right? Every -- every five-year-old,
 17 six-year-old, seven-year-old kid in the world can show
 18 me how to use a cell phone that I don't know how to use.
 19 I assume you fall within that, too. You know how to use
 20 a cell phone and how to get voice mail, how to make
 21 calls, how to pull recent calls out of your phone?
 22 MR. EDWARDS: Form.
 23 BY MR. CRITTON:
 24 Q. And you knew that --
 25 A. Okay.

1 Q. -- back in '03, '04, '05, '06, '07; didn't
 2 you?
 3 MR. EDWARDS: Form.
 4 THE WITNESS: Yeah.
 5 BY MR. CRITTON:
 6 Q. Okay. Did you ever -- before -- you say a
 7 taxi was sent to pick you up?
 8 A. Yes.
 9 Q. Okay. Before that taxi got there, did you
 10 say to yourself, you know what, what am I doing, I don't
 11 need to go back there. Did you ever think of that?
 12 A. No.
 13 Q. Would it be a correct statement, ma'am, that
 14 there's nothing about the first event, that is the first
 15 time you were at Mr. Epstein's home, that you found to
 16 be in any way traumatic?
 17 A. At the time I didn't think about it, but now
 18 I do, yes.
 19 Q. Okay. So when did you -- when did you decide
 20 that going to Mr. Epstein's house was a traumatic event
 21 in your life? Who helped you come to that conclusion?
 22 Was that only after you filed a lawsuit in this case?
 23 MR. EDWARDS: Form.
 24 THE WITNESS: No. Soon after I stopped
 25 going, it started to bother me a lot.

1 BY MR. CRITTON:
 2 Q. All right. So you went 20 times to
 3 Mr. Epstein's house, by your own testimony, and not the
 4 first, not the second, not the third, not the fourth,
 5 not the tenth, not the 15th, not the 17th, not the 20th
 6 time did you suffer any trauma; true?
 7 MR. EDWARDS: Form.
 8 THE WITNESS: Yes, I did.
 9 BY MR. CRITTON:
 10 Q. And at what time did you, in your own mind,
 11 suffer, quote/unquote, trauma or some sort of
 12 psychological problem as a result of being at
 13 Mr. Epstein's?
 14 A. Probably when I went to my program in [REDACTED]
 15 Q. That was in 2007?
 16 A. That was in -- when I was 17.
 17 Q. Okay. Which was -- you went to [REDACTED] right
 18 after the last time you saw Mr. Epstein?
 19 A. Yes.
 20 Q. So of the approximately 20 times that you
 21 went to Mr. Epstein's, at no time did you believe that
 22 you had suffered any physical injury; correct?
 23 A. What do you mean?
 24 Q. I'm just asking the question: During the
 25 time -- approximately 20 times you went to

1 A. I was only 17 when I went to [REDACTED]
 2 Q. Okay. At the time that you thought that it
 3 was wrong to go to Mr. Epstein's, why didn't you just
 4 say, I'm not going anymore?
 5 A. I -- I didn't feel like I had that choice.
 6 Q. What -- what choice? Each time you went to
 7 Mr. Epstein's, you had to make a choice, am I going or
 8 am I not going --
 9 MR. EDWARDS: Form.
 10 BY MR. CRITTON:
 11 Q. -- true?
 12 A. Not really.
 13 Q. Why not?
 14 A. Because --
 15 Q. How could you not have a choice? Because you
 16 lived west of town. He lived east of town. You lived
 17 miles apart. You had to take some affirmative action in
 18 order to get to Mr. Epstein's home; didn't you?
 19 A. No.
 20 Q. Why not?
 21 A. I had to get in a cab and...
 22 Q. That's an affirmative act. You had to either
 23 say, I'm going, or I'm not going.
 24 MR. EDWARDS: Objection to form.
 25 THE WITNESS: I don't know what you mean.

1 Mr. Epstein's, you didn't believe that you had suffered
 2 any kind of physical injury; did you?
 3 A. No.
 4 Q. No pain and suffering?
 5 A. I -- I felt like it was very wrong. I
 6 mean...
 7 Q. Which time? The first time?
 8 A. Every time.
 9 Q. Okay. Then after the first time you went and
 10 you felt that going to his house was wrong -- and you
 11 knew the difference between right and wrong; didn't you?
 12 A. Not really.
 13 Q. You knew committing -- well, as of the time
 14 that [REDACTED] took you to Mr. Epstein's the very first time,
 15 you knew the difference between right and wrong; didn't
 16 you?
 17 MR. EDWARDS: Form.
 18 THE WITNESS: Not really.
 19 BY MR. CRITTON:
 20 Q. Okay. Well, how about when you were -- when
 21 you were working at [REDACTED] or [REDACTED], did
 22 you know the difference between right and wrong?
 23 A. Yes.
 24 Q. Okay. Did you -- were you working at
 25 [REDACTED] before you went to [REDACTED], or after?

1 BY MR. CRITTON:
 2 Q. Sure you do. You know that -- what an
 3 affirmative act is, taking some overt act to do a
 4 particular task; right? You understand that?
 5 MR. EDWARDS: Form.
 6 THE WITNESS: I don't know what you mean.
 7 BY MR. CRITTON:
 8 Q. Well, you -- if -- if you have to make a
 9 decision, and your decision tree is I can say either do
 10 something or not do something, doing something is taking
 11 some affirmative act; right? Not doing something is --
 12 is a negative act, or not doing an affirmative act. Do
 13 you understand that concept?
 14 A. I guess.
 15 Q. All right. And in order to go to
 16 Mr. Epstein's house, you had to actually say -- you had
 17 to make a mental decision, that is you had to make a
 18 decision in your own mind, I'm going there. And it's
 19 okay. Right?
 20 A. Yeah, I guess so.
 21 Q. All right. You -- you say that you've lost
 22 income and you want -- in your Rule 26 disclosures,
 23 which is something that your lawyer provided or filed
 24 with the court, you said that you've lost in excess
 25 of -- you have a past and future lost wages and past and

1 future loss of earning capacities -- capacity in excess
2 of a million bucks.

3 Okay. What did Mr. Epstein -- that is, what
4 occurred at Mr. Epstein's that has caused you -- that
5 caused you to lose any money as of today's date?

6 MR. EDWARDS: Form.

7 THE WITNESS: Pretty much everything.

8 BY MR. CRITTON:

9 Q. What -- what -- what has Mister -- what was
10 your -- has your experience Mr. Epstein -- excuse me --
11 done that has caused you to lose money, as of today's
12 date?

13 A. Pretty much everything that happened at
14 Jeffrey Epstein's house makes me extremely depressed to
15 a point where I don't -- I'm extremely sluggish, and I
16 don't even feel like getting out of bed sometimes.

17 Q. Other than [REDACTED] -- well, let me
18 strike that.

19 If you still did not feel sluggish and you
20 didn't want to get out of bed, would you start stripping
21 again, working at the strip clubs?

22 A. No.

23 Q. Why?

24 A. Because I don't want to do that anymore.

25 Q. Why? Because you have a child?

1 A. No.

2 Q. Have you erased anything from your Face Book
3 over the last six months?

4 A. No.

5 Q. Okay. Are there any photographs or
6 information on your face -- well, let me strike that.

7 How long have you had Face Book?

8 A. A few months.

9 Q. Starting when?

10 A. I don't know. A few months ago.

11 Q. 2009, you started?

12 A. Yes, this year.

13 Q. Have you put any type of photographs on your
14 Face Book that would in any way -- you would find
15 embarrassing to you --

16 A. No.

17 Q. -- if someone saw it?

18 Let me get back to the loss of earnings.

19 Other than the jobs that you had -- let me strike that.

20 When you worked as a stripper at [REDACTED]
21 [REDACTED] and [REDACTED] you had -- you earned money;
22 correct?

23 A. Yes.

24 Q. Okay. How much money did you earn for the
25 year 2006?

1 A. That's part of the reason, yes.

2 Q. Okay. Ma'am, have you ever had a My Space
3 page or a Face Book page?

4 A. I have a Face Book.

5 Q. Right now?

6 A. Yes, I do.

7 Q. And what -- what's it under; what's the
8 designation under?

9 A. Jane Doe.

10 Q. And how would someone hook up with you by
11 Face Book? What would they put in?

12 A. My name.

13 Q. Jane Doe?

14 A. Yes.

15 Q. And how long have you had a -- have you ever
16 had a My Space page?

17 A. Yes.

18 Q. And did you close that down?

19 A. I've really never figured out how to make it,
20 so...

21 Q. Do you Face Book; do [REDACTED] and [REDACTED] Face Book
22 you?

23 A. No.

24 Q. Have you ever corresponded with either [REDACTED]
25 or [REDACTED] through Face Book?

1 A. I don't know.

2 Q. Did you ever keep track of it?

3 A. No.

4 Q. How about 2007?

5 A. I don't know.

6 Q. Okay. Did you ever talk with anyone about
7 the need to file Federal income tax --

8 A. No.

9 Q. -- on the money?

10 A. No.

11 Q. And I think you told me earlier you've never
12 filed income taxes?

13 A. Right.

14 Q. Okay. Approximately, do you have any idea
15 how much money you made in 2006 or 2007?

16 A. No.

17 Q. But you were able to dance in 2006 and 2007,
18 so what loss of income did Mr. Epstein -- your
19 experience with Mr. Epstein cause you?

20 MR. EDWARDS: Form. Calls for a legal
21 conclusion.

22 THE WITNESS: I guess afterward, when I -- I
23 guess I just haven't, you know, felt like good
24 enough to get another job.
25

1 BY MR. CRITTON:
 2 Q. Well, your PTSD plays a role in that, as
 3 well; doesn't it?
 4 MR. EDWARDS: Form.
 5 THE WITNESS: Not really anymore.
 6 BY MR. CRITTON:
 7 Q. If anybody has asked you since the time that
 8 you last saw Mr. Epstein, not only [REDACTED], but
 9 if anybody asks about your mental state or your
 10 emotional state, do you tell them everything?
 11 MR. EDWARDS: Form.
 12 THE WITNESS: No.
 13 BY MR. CRITTON:
 14 Q. Why not?
 15 A. Because I don't find it easy to talk about
 16 that.
 17 Q. Do you think it's easy to talk about having
 18 seen your father murder the son of his girlfriend?
 19 A. Not at all.
 20 Q. Is that easier for you to talk about --
 21 MR. EDWARDS: Form.
 22 THE WITNESS: Not at all.
 23 BY MR. CRITTON:
 24 Q. -- than your experience with Mr. Epstein?
 25 A. Not at all.

1 both of those are difficult for you to talk about?
 2 A. Yes.
 3 Q. Okay. And each -- each one is equally
 4 difficult in your own mind; isn't it?
 5 A. Yes.
 6 Q. And so if you mentioned one, you'd probably
 7 mention both, or you wouldn't mention either one;
 8 correct?
 9 MR. EDWARDS: Form.
 10 THE WITNESS: Yes.
 11 BY MR. CRITTON:
 12 Q. The second time you went back to
 13 Mr. Epstein's home, anything different happen than the
 14 first time, other than [REDACTED] wasn't there?
 15 A. Not really.
 16 Q. When is the next time you went back, then?
 17 A. I don't know.
 18 Q. How many times did you go back in the year
 19 2003?
 20 A. I don't know.
 21 Q. How many times did you go back in the year
 22 2004?
 23 A. I don't know.
 24 Q. How many times did you go back in the year
 25 2005?

1 Q. But you mention that, if somebody asks, don't
 2 you?
 3 MR. EDWARDS: Form.
 4 BY MR. CRITTON:
 5 Q. Or do you not mention that, either?
 6 A. If somebody asked what?
 7 Q. If somebody says, well, what -- what -- how
 8 do you feel? Like when you've seen physicians, been in
 9 the hospitals, and they say, you know, what's your --
 10 how do you feel, you know, are you -- are you depressed,
 11 are you happy? And what do you tell them?
 12 A. I don't know.
 13 Q. You don't know what you told them?
 14 A. No.
 15 Q. But whatever you would have said in response
 16 to if a nurse or a physician asked you, or a hospital
 17 asked you, what -- how you -- how do you feel from a --
 18 from a psychological or an emotional standpoint, you'd
 19 tell them the truth; wouldn't you?
 20 A. I don't know.
 21 Q. Okay. So you might lie to your doctor or to
 22 the hospital?
 23 A. It's not easy for me to talk about that.
 24 Q. About what? Either -- either event? Either
 25 what your father did and you witnessed, or Mr. Epstein,

1 A. I don't know.
 2 Q. How about in the year 2006?
 3 A. I don't know.
 4 Q. In fact, did you go at all in 2006?
 5 A. I'm not sure.
 6 Q. When is the last time you believe you went to
 7 Mr. Epstein's home?
 8 A. I was 17 years old.
 9 Q. Did you ever put any of the money that you
 10 received from Mr. Epstein in a bank account?
 11 A. No.
 12 Q. At any time during the time you went to
 13 Mr. Epstein's house did the -- what you've described as
 14 occurred on the first occasion, did that ever change?
 15 A. I don't know. I guess after I went more and
 16 more times, he got like more comfortable, and I guess
 17 like more like aggressive kind of.
 18 Q. How many times had you gone before there was
 19 a change?
 20 A. I don't know. Probably like six or so.
 21 Q. What year are we in now?
 22 A. I don't know. Probably -- probably 2004.
 23 Q. You're just guessing?
 24 A. Yes.
 25 Q. When you say something changed, did he

1 ever -- did he ever touch you?
 2 A. Yes.
 3 Q. Okay. On how many occasions?
 4 A. He always did, but he just got more
 5 aggressive about it. And, eventually, he wanted to use
 6 like sex toys on me.
 7 Q. Did he -- did he ever physically touch you on
 8 any occasion?
 9 MR. EDWARDS: Object to the form. Asked and
 10 answered.
 11 THE WITNESS: What do you mean?
 12 BY MR. CRITTON:
 13 Q. Did he ever touch you? You -- you were
 14 touching him, because you were giving him a massage;
 15 right?
 16 A. Yes.
 17 Q. And that's something that you were doing
 18 voluntarily?
 19 MR. EDWARDS: Form.
 20 THE WITNESS: That was something that he told
 21 me to do, yes.
 22 BY MR. CRITTON:
 23 Q. But you had to get to the house. There's no
 24 way you could give him a massage, unless you made the
 25 decision to go to his house; correct?

1 MR. EDWARDS: Form.
 2 THE WITNESS: Yes.
 3 BY MR. CRITTON:
 4 Q. Okay. Because he couldn't force you to do
 5 anything, unless you were at the home. And even if you
 6 were at the home, all you had to do was to say, no;
 7 correct?
 8 MR. EDWARDS: Form.
 9 THE WITNESS: I didn't feel that way, no.
 10 BY MR. CRITTON:
 11 Q. Well, if you did -- if you didn't feel that
 12 way, that is that you didn't have a choice, your choice
 13 was then I'm not going to Jeffrey Epstein's home ever
 14 again; true?
 15 A. No.
 16 Q. Okay. Did you take money every time you went
 17 to Mr. Epstein's home?
 18 A. Yes.
 19 Q. Did you ever say, Mr. Epstein, I don't want
 20 your money, I don't want to come back again?
 21 A. No.
 22 Q. You could have, though; couldn't you?
 23 A. I didn't know that I could have.
 24 Q. You said he touched you. How did he touch
 25 you -- well, let me ask you this: When did he first

1 touch you on any of the visits?
 2 A. He always --
 3 Q. Is that what you said, about the sixth time?
 4 A. He always touched me.
 5 Q. Where?
 6 A. He touched my breasts. He touched my vagina.
 7 He always touched me.
 8 Q. Did you ever tell him -- well, let me strike
 9 that.
 10 He couldn't touch you, unless you allowed him
 11 to touch you; correct?
 12 MR. EDWARDS: Form.
 13 BY MR. CRITTON:
 14 Q. You had to voluntarily allow him to touch
 15 you?
 16 MR. EDWARDS: Form.
 17 THE WITNESS: I don't know what you mean.
 18 BY MR. CRITTON:
 19 Q. Well, the very first time you were there, I
 20 think you said he didn't touch you; correct?
 21 A. No, I did not say that.
 22 Q. Okay. Did he touch you the very first time
 23 you were there?
 24 A. Yes.
 25 Q. Okay. Where?

1 A. My vagina.
 2 Q. And when he touched you there, did he -- did
 3 he -- was there any type of penetration, or did he just
 4 touch you?
 5 MR. EDWARDS: Form.
 6 THE WITNESS: I don't remember.
 7 BY MR. CRITTON:
 8 Q. Okay. When he touched your vagina -- with
 9 his hand?
 10 A. Yes.
 11 Q. What did you say to him?
 12 A. I didn't say anything.
 13 Q. Okay. Had anyone ever touched your vagina
 14 before? Had a male ever touched your vagina before?
 15 A. No.
 16 Q. And when he touched your vagina, did you
 17 say -- and your -- when you say your vagina, on the
 18 exterior of your body; right?
 19 A. Yes.
 20 Q. Did you say, please don't do that?
 21 A. I didn't say anything.
 22 Q. You could have. You just didn't; true?
 23 MR. EDWARDS: Form.
 24 THE WITNESS: I didn't know what to say.
 25

1 BY MR. CRITTON:
 2 Q. Well, if you -- if you had said, don't touch
 3 me -- did you ever tell him, don't touch me, or don't do
 4 that?
 5 A. I didn't think of that, no.
 6 Q. Okay. So the 20-some-odd times you were
 7 there, you never said or never thought about telling him
 8 not to do something; correct?
 9 A. That's correct.
 10 Q. Okay. So at least from his perspective --
 11 well, let me strike that.
 12 Did you ever tell him that you didn't like
 13 him touching you?
 14 A. I don't remember.
 15 Q. You don't remember telling him that; do you?
 16 A. I don't remember.
 17 Q. Okay. Well, you would remember if you said,
 18 don't touch me there, or if you had pushed his hand
 19 away; wouldn't you?
 20 MR. EDWARDS: Form.
 21 THE WITNESS: I do remember that I was like
 22 miserable, and I know that I looked miserable. And
 23 so he would pretty much tell me that, it's okay.
 24 BY MR. CRITTON:
 25 Q. You'd say you looked miserable, what do you

1 BY MR. CRITTON:
 2 Q. You may not have thought you had a choice,
 3 but it was your choice; true?
 4 MR. EDWARDS: Form.
 5 THE WITNESS: I don't know.
 6 BY MR. CRITTON:
 7 Q. You knew --
 8 MR. CRITTON: Well, why don't we take a
 9 break. We only have a couple of minutes left.
 10 (A brief recess was taken.)
 11 BY MR. CRITTON:
 12 Q. Ms. Jane Doe, do you know a person named
 13 [REDACTED]
 14 A. Do you know him by any other name?
 15 Q. I don't know him at all. I'm just asking
 16 whether you know [REDACTED]
 17 A. I'm not sure.
 18 Q. Did you know [REDACTED]
 19 A. No.
 20 Q. [REDACTED]?
 21 A. I have met him once.
 22 Q. Okay. And how do you know -- do -- how do
 23 you know him?
 24 A. A friend of a friend had his baby.
 25 Q. I'm sorry? A friend of a --

1 mean?
 2 A. Like I obviously didn't look like I was
 3 enjoying what was happening.
 4 Q. Okay. And were you enjoying what was
 5 happening?
 6 A. Absolutely not.
 7 Q. Okay. Then why did you go back? Why didn't
 8 you say, don't do that, Mr. Epstein -- or [REDACTED] -- what
 9 did you call him, Jeffrey, or did you call him
 10 Mr. Epstein?
 11 A. I didn't call him anything.
 12 Q. You never called him by his first name or his
 13 last name?
 14 A. No.
 15 Q. Is it your testimony that you never told
 16 him -- well, let me strike that.
 17 It is your testimony you never told him not
 18 to do anything; correct?
 19 MR. EDWARDS: Form.
 20 THE WITNESS: Correct.
 21 BY MR. CRITTON:
 22 Q. And everything that you did there was
 23 voluntarily -- voluntary; it was your choice?
 24 MR. EDWARDS: Form.
 25

1 A. A friend of a friend had his baby.
 2 Q. Okay. And who's the friend of a friend?
 3 A. Her name is [REDACTED]
 4 Q. [REDACTED] what?
 5 A. [REDACTED] (phonetic).
 6 Q. Do you know [REDACTED]
 7 A. No.
 8 Q. Do you know [REDACTED] --
 9 A. I --
 10 Q. -- [REDACTED] (phonetic)?
 11 A. I have met a guy named [REDACTED] but I don't
 12 know his last name.
 13 Q. Through [REDACTED]?
 14 A. Yes.
 15 Q. Okay. Do you know whether [REDACTED] -- that's
 16 [REDACTED]'s boyfriend, or someone she lived with at one time?
 17 A. I believe that he was her boyfriend.
 18 Q. Okay. Do you know someone named [REDACTED]?
 19 A. Yes.
 20 Q. Okay. How do you know him?
 21 A. I met him through [REDACTED]
 22 Q. Okay. Is that -- it's one of her boyfriends?
 23 A. Yes.
 24 Q. Okay. How about [REDACTED] (phonetic)?
 25 A. I had never met [REDACTED], but I heard about him.

1 Q. What did you hear?
 2 A. I heard that he was with [REDACTED] in the past,
 3 and he abused her.
 4 Q. Okay. Physically abused her?
 5 A. I don't know. I -- I don't know.
 6 Q. Was he into drugs, [REDACTED]?
 7 A. I don't know.
 8 Q. Okay. How about [REDACTED]?
 9 A. Yes.
 10 Q. [REDACTED] was into drugs?
 11 A. Yes.
 12 Q. What kind of drugs? Was he a drug dealer?
 13 A. I don't know.
 14 Q. You don't know; you just know he was into
 15 drugs?
 16 A. Yes.
 17 Q. Okay. Did [REDACTED] tell you that?
 18 A. You can pretty much tell.
 19 Q. From seeing him?
 20 A. Yes.
 21 Q. How?
 22 A. He -- he looked like he was on drugs every
 23 time I ever saw him.
 24 Q. Did you ever know someone named [REDACTED] that
 25 [REDACTED] dated?

1 A. [REDACTED] what?
 2 Q. I'm not sure.
 3 A. Yes.
 4 Q. Did you know an [REDACTED]?
 5 A. Yes.
 6 Q. What was his last name?
 7 A. I -- I'm not sure, but I -- I know that my
 8 uncle was friends with his uncle, whose last name was
 9 [REDACTED].
 10 Q. [REDACTED]?
 11 A. [REDACTED].
 12 Q. [REDACTED]?
 13 A. Yes.
 14 Q. Okay. And so it could have been
 15 [REDACTED] [REDACTED]?
 16 A. Yes, possibly.
 17 Q. All right. Was that -- was that Uncle [REDACTED]?
 18 A. Yes.
 19 Q. How about -- and -- and was [REDACTED] a drug
 20 guy, too?
 21 A. I don't know.
 22 Q. How about a person named [REDACTED]?
 23 A. [REDACTED].
 24 Q. [REDACTED].
 25 A. Yes, I met him.

1 Q. What was his last name?
 2 A. I don't know.
 3 Q. Another [REDACTED] person?
 4 A. Yes.
 5 Q. Okay. These are all people that she had
 6 relationships with?
 7 A. I guess so.
 8 Q. [REDACTED] [REDACTED] (phonetic), is that the [REDACTED]
 9 you were talking about?
 10 A. Yes.
 11 Q. Okay. Did [REDACTED] ever tell you that she had
 12 been raped or molested?
 13 A. No.
 14 Q. Did [REDACTED] ever tell you that she had been
 15 raped or molested?
 16 A. No.
 17 Q. Ma'am, have you ever had an abortion?
 18 A. No.
 19 Q. Have you ever been pregnant, other than the
 20 one time with this -- your current child?
 21 A. No.
 22 Q. Ms. Jane Doe, didn't [REDACTED] tell you before
 23 you -- she first took you to Mr. Epstein's house that --
 24 didn't she say specifically, I told her that we were
 25 going to go to just an old guy's house, he is really

1 rich, and he has a beautiful mansion, and we're going to
 2 go upstairs and give him a massage. I told her, her
 3 meaning Jane Doe, that I would be there with her for
 4 half the time, and I would leave the room. And when I
 5 left the room, he is going to turn over and do himself,
 6 by meaning ejaculating.
 7 She told you that before you went to
 8 Mr. Epstein's house the first time; didn't she?
 9 A. No.
 10 Q. Okay. Didn't she also tell you on the first
 11 occasion that you would have to be topless?
 12 MR. EDWARDS: Form.
 13 THE WITNESS: No.
 14 BY MR. CRITTON:
 15 Q. Didn't she tell you that Jeffrey was a nice
 16 guy and wouldn't make you do anything that you didn't
 17 want to do, or words to that effect? Didn't [REDACTED] tell
 18 you that before the first time?
 19 A. That is not exactly what she said to me.
 20 Q. That's what you understood, though?
 21 A. No.
 22 Q. Okay. Well, did she tell you that, that
 23 Jeffrey was -- that the older man was a nice guy that
 24 wouldn't make you do anything that you don't want to do?
 25 A. No.

1 Q. Okay. Didn't she tell you that you were
 2 going to see him ejaculate?
 3 A. No.
 4 Q. If [REDACTED] had said those things, your position
 5 is [REDACTED] is lying; right?
 6 MR. EDWARDS: Form.
 7 THE WITNESS: She certainly could have been
 8 mistaken.
 9 BY MR. CRITTON:
 10 Q. Well, assuming she testified under oath,
 11 there's a difference between mistaken and being lie --
 12 and lying; isn't there, in your mind?
 13 MR. EDWARDS: Form.
 14 THE WITNESS: If she thought that she told me
 15 that, then she was mistaken, because she did not
 16 tell me that.
 17 BY MR. CRITTON:
 18 Q. Has anybody ever told you that you may have a
 19 cause of action against [REDACTED] for having brought you to
 20 Mr. Epstein's house the first time?
 21 MR. EDWARDS: Form.
 22 THE WITNESS: No.
 23 BY MR. CRITTON:
 24 Q. Have you ever signed a -- you're aware that
 25 Mister -- we established earlier that Mr. Edwards

1 and -- you and your attorney answered them -- or you
 2 answered them on January 23rd of 2009 -- at least that's
 3 when they were sent to me.
 4 Do you remember receiving these written
 5 questions?
 6 A. I remember discussing these questions over
 7 the phone with Brad.
 8 Q. Okay. And you don't have to tell me what was
 9 discussed, but you and your attorney consulted one
 10 another?
 11 A. Yes.
 12 Q. Okay. And you see, if you go to the very
 13 last page, there's a verification. It says: "The
 14 foregoing answers to interrogatories are true and
 15 correct, to the best of my knowledge, information and
 16 belief." And it has Jane Doe, Plaintiff. Is that your
 17 Jane Doe?
 18 A. Yes.
 19 Q. All right. And all of the answers to these
 20 interrogatories you represented to be true and accurate;
 21 correct?
 22 A. I did look over some of them with Brad, and
 23 some of them were not right.
 24 Q. Okay. Well, that's not my question. When
 25 you sent these out to me, or when Mr. Edwards -- take it

1 represents [REDACTED]. Have you ever signed a waiver of
 2 conflict letter about that you would agree not to sue
 3 [REDACTED]?
 4 A. Not that I know of.
 5 Q. Are you aware that you have a claim -- that
 6 you may well have a claim against [REDACTED] for having taken
 7 you to Mr. Epstein's the first time?
 8 MR. EDWARDS: Form.
 9 THE WITNESS: No.
 10 BY MR. CRITTON:
 11 Q. Did you ever reach an agreement with [REDACTED]
 12 that you wouldn't sue her?
 13 A. No.
 14 Q. Do you have a side agreement with [REDACTED], oh, I
 15 won't sue you, [REDACTED]?
 16 A. No.
 17 MR. CRITTON: This is Number 6.
 18 Let me show you Exhibit 6, which are your
 19 answers to interrogatories.
 20 Here you go, Brad, there's a copy for you.
 21 (Defendant's Exhibit No. 6 was marked for
 22 identification.)
 23 BY MR. CRITTON:
 24 Q. These are interrogatories that were sent to
 25 you, ma'am, back in -- I believe in December. And you

1 back.
 2 When you signed these answers to the
 3 interrogatories on January 23rd, 2009, and verified
 4 they're true and correct, you represented to me and to
 5 the Court that these answers were true and correct. You
 6 understood that, yes; correct?
 7 MR. EDWARDS: Form.
 8 THE WITNESS: Yes.
 9 BY MR. CRITTON:
 10 Q. All right. And as of today's date, which is
 11 September 30, 2009, you have made no corrections to
 12 these interrogatories; have you?
 13 MR. EDWARDS: Form.
 14 THE WITNESS: I have told Brad that there
 15 were some.
 16 BY MR. CRITTON:
 17 Q. Okay. You need to listen to my question,
 18 ma'am.
 19 As of today's date, you have filed -- at
 20 least, you're unaware of any filing that's been made on
 21 your behalf to correct any of these answers to
 22 interrogatories; true?
 23 MR. EDWARDS: Form. And I'd like you to let
 24 the witness answer the question, as she was. As
 25 you know, no Plaintiffs file anything; the

1 attorneys do it for them. And she was going to
2 answer your question.

3 MR. CRITTON: Well, if she tells me -- you're
4 going to let her -- she's trying to say what Brad
5 told me, or something. So if you're going --
6 willing to waive the attorney/client privilege,
7 I'll let her go ahead. I was just trying to help
8 you out here. Good Samaritan.

9 MR. EDWARDS: Yeah.

10 She has made me aware of better answers, and
11 I will file.

12 BY MR. CRITTON:

13 Q. At least as of today, you have done nothing?
14 You have -- you have not signed any papers that would
15 change the exhibit -- the answers in Exhibit 6; true?

16 MR. EDWARDS: Form.

17 THE WITNESS: Right.

18 BY MR. CRITTON:

19 Q. Have you ever worked as an escort?

20 A. No.

21 Q. In any of your -- your gigs that you did at
22 either [REDACTED] or [REDACTED], did -- did any male
23 or female ever ask you to go out with them on a date?

24 A. Yes.

25 Q. Okay. Did you ever go with any of those

1 Q. Well, how about average days per month, did
2 you work at least ten days a month?

3 A. Yes.

4 Q. Okay. And if you worked ten days a month,
5 and you were getting \$10 -- I'm sorry -- ten days a
6 month times 200 bucks, you would get about \$2,000 a
7 month? So you had to have been earning at a minimum of
8 about 2,000 -- \$2,000 a month times 16 months, you would
9 have made about \$32,000 minimum, working for [REDACTED]
10 and [REDACTED], right? That's just math.

11 MR. EDWARDS: Form.

12 THE WITNESS: Possibly.

13 BY MR. CRITTON:

14 Q. You may have made more?

15 A. I probably actually made less.

16 Q. Okay. Well, you could have made more; could
17 have made a little less --

18 MR. EDWARDS: Form.

19 BY MR. CRITTON:

20 Q. -- right?

21 A. No.

22 Q. No what?

23 A. I didn't make more than that.

24 Q. Okay. How do you know that, if you never --
25 if you didn't keep track of your records? And I'm just

1 individuals?

2 A. No.

3 Q. During the time that you worked -- and I was
4 trying to -- worked at -- that you worked at Platinum,
5 and then [REDACTED], you worked, I think we worked out
6 about, let's see -- six -- four -- 14 to 16 months that
7 you would have worked at [REDACTED] and [REDACTED],
8 something. Does that sound about right?

9 A. Yes.

10 Q. Okay. And you said that your -- your general
11 take was approximately \$200 a night?

12 A. Yes.

13 Q. Okay. And if you, over that 14- to 16-month
14 time period, would you say that you worked an average of
15 about five days a week?

16 A. No.

17 Q. How many days a week?

18 A. Um.

19 Q. I know you said sometimes you work seven;
20 sometimes you might not work for --

21 A. Sometimes I didn't work for a month or two.

22 Q. Approximately, out of those 14 to 16 months,
23 approximately how many -- what would have been your
24 average number of days that you would have worked?

25 A. I have no idea.

1 trying to use your numbers. So it was about \$200 a day,
2 times ten days a month, times 16 months, would be about
3 32,000 bucks; right?

4 A. If I made \$200 every time.

5 Q. Well, if -- if you did -- how many lap dances
6 would you generally do a night?

7 A. I don't know.

8 Q. Did you always get at least one lap dance a
9 night?

10 A. No.

11 Q. And some nights nobody was interested in
12 doing a lap dance with you?

13 A. That's right.

14 Q. Did you have some nights that maybe a few
15 people were interested in a lap dance?

16 A. Yes.

17 Q. Okay. When you were at -- working at
18 [REDACTED] and at [REDACTED], were you still taking
19 drugs? You were still working with illegal drugs;
20 weren't you?

21 MR. EDWARDS: Form.

22 THE WITNESS: At times.

23 BY MR. CRITTON:

24 Q. Okay. Did you ever take illegal drugs before
25 you went to Mr. Epstein's house?

1 A. No.
 2 Q. Separate and apart from -- you -- you
 3 mentioned your friend, [REDACTED] -- give me her last name.
 4 A. [REDACTED]
 5 Q. [REDACTED] (phonetic).
 6 A. [REDACTED]
 7 Q. [REDACTED] Her, too. Let me start again.
 8 With Melissa [REDACTED], did you ever take her
 9 to Mr. Epstein's house?
 10 A. No.
 11 Q. Okay. Why not?
 12 A. I didn't want to.
 13 Q. Did you ever tell her about what you were
 14 doing at Epstein's house?
 15 A. No.
 16 Q. Okay. Did you ever tell anyone?
 17 A. No.
 18 Q. Did you -- did sister [REDACTED] or [REDACTED] or
 19 [REDACTED] ever say to you, what do you mean you're
 20 cleaning this guy's house over in Palm Beach, what's
 21 going on here, you're coming home with a couple of
 22 hundred bucks each time?
 23 A. No.
 24 Q. Okay. Did you ever spend more than an hour
 25 at Mr. Epstein's home?

1 A. Yes.
 2 Q. Was it a psychiatrist or a psychologist or a
 3 licensed mental health counselor?
 4 A. I don't know.
 5 Q. Have you ever seen any of the records from
 6 [REDACTED]?
 7 A. No.
 8 Q. You're yawning. Were you up late last night?
 9 A. No.
 10 Q. Okay. You're certain you're not on any kind
 11 of medication today?
 12 A. Yes.
 13 Q. Any kind of prescription or nonprescription
 14 medication?
 15 A. Yes.
 16 Q. Okay. When you were at [REDACTED], I think you
 17 said -- how often would you talk to a psychologist or
 18 a -- some sort of a mental health counselor type person?
 19 A. I don't know.
 20 Q. Once a day? Once a week? Once a month?
 21 A. About once a week.
 22 Q. Did you talk to them about -- did Epstein
 23 ever come up?
 24 A. No.
 25 Q. Okay. Did your -- the murder trial that you

1 A. No.
 2 Q. Okay. So you would get 200 bucks, or then
 3 300 I think you said later on, for being at
 4 Mr. Epstein's. Did you show them how much money you
 5 got?
 6 A. No.
 7 Q. Did you ever pay [REDACTED] or your uncle for
 8 taking you?
 9 A. Yes.
 10 Q. How much did you pay them?
 11 A. I don't know, 25, maybe \$50.
 12 Q. I think you said that you -- you ended up at
 13 [REDACTED] School as a result of a -- of the prosecution
 14 relating to grand theft auto; correct?
 15 A. Yes.
 16 Q. And during the time you were at [REDACTED], did
 17 you see a psychologist?
 18 A. Yes.
 19 Q. Was that part of your therapy or part of the
 20 sentence?
 21 A. Yes.
 22 Q. Okay. Did you talk with a therapist about --
 23 do you remember the name of the therapist?
 24 A. No.
 25 Q. Was it more than one therapist?

1 testified in come up?
 2 A. Yes.
 3 Q. Did your trouble with the law, that is the
 4 grand theft auto and other problems that you had, did
 5 you discuss that with the therapist?
 6 MR. EDWARDS: Form.
 7 THE WITNESS: I discussed common knowledge
 8 with them, yes.
 9 BY MR. CRITTON:
 10 Q. Common knowledge?
 11 A. Things that everybody pretty much knew.
 12 Q. What do you mean by that? I don't know what
 13 you mean by common knowledge.
 14 A. Stuff that you can just find out.
 15 Q. Got to help me here. I don't know what you
 16 mean.
 17 A. Well, obviously, I was charged with a crime
 18 to be sent there, so they knew about that.
 19 Q. Which was the grand theft auto?
 20 MR. EDWARDS: Form.
 21 THE WITNESS: Yes.
 22 BY MR. CRITTON:
 23 Q. Okay. What other crimes had you committed by
 24 that point in time? We have an offense where you
 25 shoplifted in Palm Beach County; right?

1 MR. EDWARDS: Form.
 2 THE WITNESS: Yes.
 3 BY MR. CRITTON:
 4 Q. Okay. Any other crimes that you can remember
 5 off the top of your head as sitting here?
 6 A. Running away.
 7 Q. And did you discuss those all with the
 8 therapist?
 9 A. Yes.
 10 Q. Okay. And how would the therapist have known
 11 about your testimony and your involvement with regard to
 12 seeing your father murder [REDACTED]?
 13 A. Because my mother asked that I work on that.
 14 Q. And you say that nothing ever came up with
 15 regard to Mr. Epstein or any of the -- what had occurred
 16 at Epstein's with the therapist?
 17 A. No.
 18 Q. Why not? Why didn't you bring it up if it
 19 was such an important event for you?
 20 A. Because I did not want my family to know.
 21 Q. But -- and then the only people in your
 22 family as far as you know, today that know, is your
 23 [REDACTED]?
 24 A. Yes.
 25 Q. Did you ever tell your sisters [REDACTED] and

1 Q. Have you been evaluated by any psychiatrist
 2 or psychologist at the request of your attorney?
 3 A. No.
 4 Q. Have you ever seen a person by the name of
 5 [REDACTED]?
 6 A. Yes.
 7 Q. Okay. Well, who do you think she is?
 8 A. A psychologist or a psychiatrist or
 9 something.
 10 Q. Okay. And how did you get -- when did
 11 Ms. [REDACTED] do an evaluation on you?
 12 A. She did not.
 13 Q. Okay. When did you see her?
 14 A. I don't know.
 15 Q. This year?
 16 A. Yes. Not long ago, like --
 17 Q. In the past -- I'm sorry; go ahead.
 18 A. -- a month, maybe two.
 19 Q. Okay. And how did it get set up that you
 20 would meet with Ms. [REDACTED]?
 21 MR. EDWARDS: Objection. Do not answer.
 22 Attorney/client privilege.
 23 BY MR. CRITTON:
 24 Q. Did you meet with her?
 25 A. Yes.

1 [REDACTED] that you were making money from giving -- for
 2 giving massages to Mr. Epstein?
 3 A. No.
 4 Q. Did you ever tell either [REDACTED] or [REDACTED]
 5 that you liked going to Mr. Epstein's house?
 6 A. No.
 7 Q. Did you -- did [REDACTED] or [REDACTED] ever meet
 8 Mr. Epstein?
 9 A. No.
 10 Q. Did Ms. Brewer ever meet Mr. Epstein?
 11 A. No.
 12 Q. Have you seen -- other than [REDACTED] -- well,
 13 you've seen [REDACTED] who I -- at least, looking
 14 at her resume, she's a licensed mental health counselor
 15 through Victim Services. Is that -- am I right?
 16 MR. EDWARDS: Form.
 17 THE WITNESS: Yes.
 18 BY MR. CRITTON:
 19 Q. Other than [REDACTED], have you seen any
 20 other psychologist, psychiatrist or licensed mental
 21 health counselor relating to any damages you claim in
 22 this case that were caused by Mr. Epstein?
 23 A. No.
 24 Q. Why not?
 25 A. Because I'm embarrassed.

1 Q. Okay. Where did you meet with her?
 2 A. Somewhere downtown. I -- I don't exactly
 3 remember where it was.
 4 Q. Downtown in West Palm Beach?
 5 A. Yes.
 6 Q. And how long -- how much time did you spend
 7 with her?
 8 A. Not very much.
 9 Q. And why not?
 10 MR. EDWARDS: Objection. It was a
 11 consultation, and we're claiming a privilege.
 12 She's not going to divulge the circumstances or the
 13 conversation between herself and Ms. [REDACTED] --
 14 Dr. [REDACTED].
 15 MR. CRITTON: Is Ms. [REDACTED] -- are you
 16 intending to use Ms. [REDACTED] as an expert in this
 17 case?
 18 MR. EDWARDS: No.
 19 BY MR. CRITTON:
 20 Q. Okay. I asked you earlier whether your
 21 attorney -- whether your attorney had set up any
 22 meetings for you to meet with a psychologist or a
 23 psychiatrist or a licensed mental health counselor, and
 24 you said, no. And it wasn't until I said, did you ever
 25 meet Amy [REDACTED] or someone like her, and you go, yeah, I

1 did. Why didn't you tell --
 2 A. You asked me if --
 3 Q. -- me what --
 4 A. -- I had an evaluation, which I did not.
 5 Q. Oh, okay. So you -- you met Ms. [REDACTED] but
 6 she never did an evaluation?
 7 A. Yes.
 8 Q. Okay. Was it your choice -- did you not want
 9 her to evaluate you?
 10 MR. EDWARDS: Objection. The witness is not
 11 answering the question as to Dr. [REDACTED] or that
 12 meeting. We're claiming a privilege as to that
 13 communication between Dr. [REDACTED] and the Plaintiff.
 14 And, as well, this pertains to attorney/client
 15 information. Any answers that she gives will
 16 violate one or two of those privileges. She's not
 17 going to answer any more questions on this topic.
 18 BY MR. CRITTON:
 19 Q. With regard to -- have you seen, other than
 20 whatever you -- whatever time you spent with Ms. [REDACTED]
 21 Dr. [REDACTED] and your visits with [REDACTED] have you
 22 seen any other psychiatrists, psychologists, licensed
 23 mental health counselor, physician, medical health
 24 provider, relating to any damages that you are claiming
 25 in this case?

1 Ms. [REDACTED] are helpful?
 2 A. Sometimes.
 3 Q. Okay. And how often do you see her?
 4 A. I was seeing her once a week. I haven't seen
 5 her in a while now, though.
 6 Q. Why not? When is the last time -- well, let
 7 me strike that.
 8 When did you last see her?
 9 A. About a month or so ago.
 10 Q. And why haven't you seen her again?
 11 A. I don't know.
 12 Q. Do you intend to go back to see her, or just
 13 going to kind of wait and see?
 14 A. Yes, I do.
 15 Q. I'm sorry?
 16 A. Yes, I do.
 17 Q. Has -- has she called you or you called her
 18 in the month or so that you have not seen her?
 19 A. Yes.
 20 Q. Did she call you, or did you call her?
 21 A. She called me.
 22 Q. Did she say, why haven't you come in?
 23 A. She was reminding me of an appointment that
 24 we had.
 25 Q. All right. And you said what?

1 A. No.
 2 Q. Have you sustained -- have you incurred any
 3 medical bills, psychiatric bills, psychological bills,
 4 any type of bills associated with damages that you are
 5 claiming in this case against Mr. Epstein as of today's
 6 date?
 7 A. No.
 8 Q. Has anybody told you that you will incur any
 9 medical bills or expenses in the future as a result of
 10 any claims that you have made against Mr. Epstein?
 11 MR. EDWARDS: Objection. Attorney/client
 12 privilege.
 13 BY MR. CRITTON:
 14 Q. Other than Mr. Edwards. I'm not interested
 15 in what he told you. I'm interested, but I'm not
 16 entitled to know.
 17 A. I don't know. Like who?
 18 Q. I don't know. Has -- has anybody told you,
 19 has -- has anybody said -- has Doctor -- or
 20 Miss -- Ms. [REDACTED] told you is that -- well, let me
 21 strike that. Let me ask it this way: Has Ms. [REDACTED]
 22 told you that she thinks you're doing better, that
 23 you're improving?
 24 A. I don't know.
 25 Q. Do you feel like the sessions with

1 A. That I would come.
 2 Q. But you haven't been back yet; correct?
 3 A. The appointment has not come up yet.
 4 Q. When is the next appointment?
 5 A. I -- I don't know the exact date. It's
 6 October something.
 7 Q. Other than [REDACTED] Mr. A, B and C who you
 8 identified, have you had a sexual relationship or any
 9 sexual activity with any other person, male or female?
 10 A. Yes.
 11 Q. Who else have you had sexual activity with?
 12 MR. EDWARDS: She's not going to identify
 13 people.
 14 BY MR. CRITTON:
 15 Q. First let's -- it's when -- when else did you
 16 have any type of sexual activity, either with a male or
 17 a female, other than Mr. A, B and C and [REDACTED]?
 18 A. I guess in between the time that I had a
 19 relationship one -- with one person, to the time that I
 20 had a relationship with another person.
 21 Q. Okay. Well, your lawyers kept me to Mr. A, B
 22 and C, so who do we fit in here? Where do we fit this
 23 other person into? Between A and B, B and C, C and
 24 [REDACTED], post [REDACTED], pre [REDACTED]? You need to help me
 25 with the date; then I can ask an intelligent question.

1 A. Yes, before [REDACTED].
 2 Q. So it would have been after the stalker,
 3 Mr. C?
 4 A. Yes.
 5 Q. And before [REDACTED]?
 6 A. Yes.
 7 Q. Okay. You didn't mention him earlier. You
 8 told me earlier today that you had had no sexual
 9 activity -- or the next sexual activity that you had
 10 after Mr. C was [REDACTED]. That wasn't true; was it?
 11 A. That was the next relationship that I had.
 12 Q. I wasn't asking about -- I'm talking about
 13 sexual activity. I don't care about -- it's not that I
 14 don't care.
 15 When's the next sexual activity? Was it
 16 after Mr. C?
 17 A. Yes.
 18 Q. Okay. And who was that with? We'll call him
 19 Mr. D? Was it a man or a woman?
 20 A. It was a man.
 21 Q. And Mr. D was short-term, long-term,
 22 one-night stand, multiple?
 23 A. I -- I never had a relationship with him, but
 24 I was seeing him for some time.
 25 Q. How long a time period?

1 BY MR. CRITTON:
 2 Q. Did you ever spend the night with him?
 3 A. No.
 4 Q. Did he spend the night with you?
 5 A. No.
 6 Q. Did you just meet and have sex?
 7 A. We met and spoke to each other for a period
 8 of time before we had sex.
 9 Q. Where did you meet him?
 10 A. I met him in my neighborhood.
 11 Q. And let me just ask you: What's his name?
 12 MR. EDWARDS: She's not going to give it.
 13 MR. CRITTON: You're instructing -- your
 14 objection is?
 15 MR. EDWARDS: My objection is based on the
 16 privacy rights of this individual answering the
 17 questions, as well as third-party individuals.
 18 BY MR. CRITTON:
 19 Q. Over what period of time, then, did you have
 20 sexual relations with him? Four or five months?
 21 A. It was during the entire time that I worked
 22 at [REDACTED].
 23 Q. Which was about eight months?
 24 A. Yes.
 25 Q. All right. So over a period of about once a

1 A. Probably the whole time I worked at [REDACTED]
 2 [REDACTED].
 3 Q. What did he do for a living?
 4 A. I don't know.
 5 Q. Did you meet him at [REDACTED]?
 6 A. No.
 7 Q. Did you meet him through [REDACTED]?
 8 A. No.
 9 Q. What did he do -- the guy -- you said you
 10 don't know what he did for a living?
 11 A. No.
 12 Q. So you saw him the whole time you were
 13 working at [REDACTED], which was eight months, and
 14 you never know what kind of work he did?
 15 A. No.
 16 Q. You never knew what kind of work he did?
 17 A. No.
 18 Q. Are you -- are you serious?
 19 A. I only saw him maybe once a week.
 20 Q. Okay. So you saw him once a week for eight
 21 months. All right. And you're telling the members of
 22 the -- the ladies and gentlemen of the jury that you
 23 have no idea what this man did for a living?
 24 MR. EDWARDS: Object to the form.
 25 THE WITNESS: Yes.

1 week you would meet and you would have sexual relations.
 2 Are we talking about intercourse?
 3 A. Not every time.
 4 Q. Okay. Well, that's why I asked. So, but
 5 many of the times you would have sexual activity.
 6 Intercourse?
 7 A. Some of the times, yes.
 8 Q. Did you also have oral?
 9 A. No.
 10 Q. Strictly sexual intercourse?
 11 A. Yes.
 12 Q. Okay. Anyone else that you've had sexual --
 13 any sexual activity with, other than Mr. A, B, C, D and
 14 [REDACTED]?
 15 A. No.
 16 Q. Nobody else?
 17 MR. EDWARDS: Object to the form.
 18 BY MR. CRITTON:
 19 Q. Male or female, is that correct?
 20 A. Yes.
 21 Q. Have you ever had sex with a female?
 22 A. No.
 23 Q. Did Mr. D ever provide you money at any time?
 24 A. No.
 25 Q. Did he ever provide you any kind of like kind

1 compensation? And by that, he's made -- you know,
2 probably bought you -- probably ate out and had dinner
3 or something. But separate from that, did he buy you
4 clothes, did he buy you perfume, did he buy you anything
5 or give you anything?

6 MR. EDWARDS: Form.

7 THE WITNESS: No.

8 BY MR. CRITTON:

9 Q. Are you currently involved in any type of
10 civil or criminal proceedings, other than this
11 proceeding with Mr. Epstein?

12 A. What does that mean?

13 Q. I'm sorry?

14 A. What does that mean?

15 Q. Are you under any type of house arrest at the
16 current time?

17 A. No.

18 Q. Okay. Are there any criminal proceedings
19 that are outstanding directed to you, anything from a
20 traffic ticket up? Have you been arrested for any other
21 circumstance that's pending at the current time?

22 A. Yes.

23 Q. What?

24 A. Traffic ticket.

25 Q. All right. For what? What did you do?

1 A. Driving without a license.

2 Q. And whose car were you driving?

3 A. [REDACTED]

4 Q. This is the -- did she authorize you to take
5 the vehicle, or is this another time that you stole the
6 car from her?

7 A. No. She gave me the car because she bought a
8 new car, and I was supposed to get my license.

9 Q. And do you still have the car?

10 A. No.

11 Q. What happened to the car?

12 A. It was impounded.

13 Q. All right. Did you get into an accident?

14 A. No.

15 Q. How did you get caught?

16 A. I was driving the wrong way.

17 Q. On a street?

18 A. Uh-huh.

19 Q. Yes?

20 A. Yes.

21 Q. Okay. Is -- is it -- I've gotten reasonably
22 good advice that they don't impound a car for driving
23 without a license. So why did they impound the car in
24 this instance?

25 A. They did not impound it on that instance.

1 Q. What else happened that they impounded the
2 car?

3 A. My brother was driving the car, and --

4 Q. In the commission of a crime?

5 A. I do not know.

6 Q. Okay. Why did they -- why would they impound
7 the car, if your brother was just driving the car? Does
8 he have a license?

9 A. No.

10 Q. He doesn't have a license, either?

11 A. No. He was being questioned by a police
12 officer, and he ran.

13 Q. He fled in the car?

14 A. No, he ran on foot. And the car was
15 impounded because he left it wherever it was, at the
16 store or something.

17 Q. Okay. So it wasn't impounded because you
18 were driving without a license, and it wasn't impounded
19 because you were driving the wrong way on a one -- on a
20 street; right?

21 A. Yes.

22 Q. It was because of [REDACTED]?

23 A. Yes.

24 Q. Okay. Any other criminal or misdemeanor or
25 traffic type events in your life at the current time?

1 A. No.

2 Q. Okay. Have you ever been under house arrest?

3 A. No.

4 Q. Any other civil proceedings that are pending
5 at the current time?

6 A. No.

7 Q. Any proceedings with the Department of
8 Children and Family Services?

9 A. No.

10 Q. You and [REDACTED] planning to get married? Any
11 plans, or just living together?

12 A. We have talked about it.

13 Q. Okay. I'm sorry?

14 A. We have talked about it.

15 Q. Well, you've been going together since when,
16 '07?

17 A. Yes.

18 Q. Okay. And it's now '09, and you have a child
19 together, so have you just been talking about it for
20 those two years?

21 A. About the past year we have.

22 Q. Does he provide any support at the current
23 time for the child?

24 A. Not right now.

25 Q. And who's providing support for you and your

1 family at the current time?

2 A. [REDACTED] helps us.

3 Q. How much does she help you with a month?

4 A. Before now she didn't need to help us, but
5 since [REDACTED] (phonetic) has lost his job in the last
6 three weeks, she's helped us.

7 MR. CRITTON: I'm going to adjourn for today
8 because of the time. It's about a quarter to 6:00.
9 And I can tell you this, that I -- I have not gone
10 into all of the different events at Mr. Epstein's
11 home, because she was there some 20 times. So
12 those are areas that I intend to go into. I think
13 I can probably complete the deposition in another
14 hour and a half to three hours, max.

15 And there are some other areas that I -- you
16 know, if I could -- and we've been going pretty
17 steadily, at a pretty good clip. So if I could
18 take some time, I -- and can think about my
19 thoughts, I'll try to make it even faster than that
20 at the next session.

21 MR. EDWARDS: Well, I'm not going to agree to
22 it. We're going to have to have some discussion
23 with the Court as to whether or not this deposition
24 is going to be completed on another date. I
25 provided her here at 9:30. I had her here for the

1 seven hours, and I think that I'll be able to
2 demonstrate to the Court that many of the questions
3 were redundant, asked and answered over and over
4 and over again. And we're here, ready to complete
5 the deposition. If you want to finish it, we'll
6 finish it. If you think that you will prevail at
7 that hearing and you're going to come back another
8 time, that's up to you.

9 MR. CRITTON: All right. Well, let's take a
10 break for a few minutes, and I'll decide what I
11 want to do.

12 MR. EDWARDS: Okay.

13 VIDEOGRAPHER: Off the record at 5:48.

14 (Discussion held off the record.)

15 MR. CRITTON: I'll put on the record, when
16 I've finished my 15 minutes of the additional areas
17 that I would like to cover with her. And we can go
18 to the Court on those particular issues.

19 MR. EDWARDS: All right.

20 MR. CRITTON: And, you know, we spent seven
21 hours -- almost eight hours with [REDACTED] -- I'm saying
22 [REDACTED] -- with [REDACTED] in a
23 deposition in Federal Court. And Mr. [REDACTED]
24 worked for Mr. Epstein for a period of six to eight
25 months. This is a --

1 I'm on the record.

2 COURT REPORTER: Okay.

3 MR. CRITTON: Did you not get any of that?

4 COURT REPORTER: I have it just...

5 VIDEOGRAPHER: You'll be able to get it
6 later.

7 MR. EDWARDS: I -- I remember what he said.
8 Don't worry about it.

9 UNIDENTIFIED SPEAKER: He said, on the
10 record. He said, on the record, so I figured --

11 COURT REPORTER: I'll check the video.

12 MR. CRITTON: All right.

13 UNIDENTIFIED SPEAKER: Clear -- clearly, the
14 Court Reporter's tired.

15 COURT REPORTER: Well -- well, I said
16 something to you about I was starting -- okay.
17 This is --

18 UNIDENTIFIED SPEAKER: All right.

19 COURT REPORTER: We're back on, and I'll --

20 UNIDENTIFIED SPEAKER: But you got it?

21 COURT REPORTER: And I got it. * CHECK ALL.

22 MR. CRITTON: All right. So we spent eight
23 hours with chap, who was there for eight months
24 and -- with -- with the various lawyers in that.
25 So this is a young lady who claims that she was at

1 Mr. Epstein's house 20 times -- well, I'll get to
2 that later, so let me get to where I'm going, and
3 I'll...

4 MR. EDWARDS: Sounds like a good idea.

5 MR. CRITTON: Thank you.

6 BY MR. CRITTON:

7 Q. Ms. Jane Doe, what did you do, if anything --
8 and I don't want to know what conversations you had with
9 your lawyer -- to prepare for this deposition today, if
10 anything?

11 MR. EDWARDS: Object to the form.
12 Attorney/client.

13 MR. CRITTON: No, I don't want to know what
14 your discussions were. I want to know what -- what
15 did you --

16 MR. EDWARDS: Maybe I missed your question.

17 BY MR. CRITTON:

18 Q. What did you do to prepare for this
19 deposition, if anything, other than converse with your
20 attorney?

21 A. I went to bed early. I don't know.

22 Q. Did you make any notes?

23 A. I read through the questions that I answered.

24 Q. The interrogatories?

25 A. Yes.

1 Q. Excuse me. Did you review any notes that you
2 had made about any of your experiences at Mr. Epstein's
3 home?

4 A. No, I've never made any notes.

5 Q. Have you ever written out -- well, let me
6 strike that.

7 Did you review a copy of your complaint?

8 A. No.

9 Q. Okay. Have you ever seen your complaint?

10 A. Yes.

11 Q. And do you know what you're asking for in the
12 way of damages in your complaint?

13 A. Not exactly.

14 Q. Okay. Your complaint says you want
15 \$50 million. What's the basis for that claim?

16 MR. EDWARDS: Object to the form.

17 THE WITNESS: Pretty much just to hurt
18 Jeffrey Epstein.

19 BY MR. CRITTON:

20 Q. Okay. Not to compensate yourself, but just
21 to hurt Jeffrey Epstein; is that correct?

22 A. Pretty much.

23 Q. When you said you realized some of your
24 answers to the interrogatories were incorrect, when did
25 you discover that?

1 BY MR. CRITTON:

2 Q. And did you say it after you read them?

3 A. Yes.

4 Q. And who did you say whatever you said to
5 about some of the answers being incorrect, who did you
6 say that to?

7 MR. EDWARDS: Objection. Attorney/client
8 privilege --

9 MR. CRITTON: Okay.

10 MR. EDWARDS: -- as to who within my firm
11 she's talking about, now that you're already
12 discussing the substance about -- of the
13 conversation.

14 BY MR. CRITTON:

15 Q. Well, you said that you realized some of the
16 answers were wrong, so you called somebody. And I don't
17 want to know what happened or what exactly you said, but
18 you spoke to someone at Mr. Edwards' firm; is that
19 correct?

20 A. Yes.

21 Q. And that was a number of months ago; true?

22 A. I'm not -- I'm not sure when it was.

23 Q. If you -- you testified --

24 A. It was -- it was at least a month ago.

25 Q. Let me show you what I'll mark as Exhibit

1 A. I'm not exactly sure.

2 Q. Was it yesterday? Was it today? Was it a
3 month ago? Was it six months ago?

4 A. I probably noticed whenever I first got the
5 copy of it.

6 Q. Which was what, shortly after it was signed
7 on January 23rd of '09?

8 A. I'm not sure if I have a copy of it, but I
9 know that I looked over it, and we talked about it
10 having some wrong answers.

11 Q. And that was months ago?

12 A. Not exactly sure how long ago it was.

13 Q. Well, it wasn't yesterday; was it?

14 A. We did look at it yesterday and talk about
15 it, but...

16 Q. But you realized the -- some of the answers
17 were incorrect when you got it sometime in January or
18 early February of this year, when you got a copy of it;
19 is that correct?

20 MR. EDWARDS: Object to the form.

21 BY MR. CRITTON:

22 Q. A copy of Exhibit 6?

23 MR. EDWARDS: Form.

24 THE WITNESS: I know that I -- I did say
25 something about some of the answers.

1 Number 7, Composite Exhibit 7.

2 (Defendant's Composite Exhibit No. 7 was
3 marked for identification.)

4 MR. CRITTON: Here's an extra copy, Brad.

5 BY MR. CRITTON:

6 Q. Have you seen a copy of the letter which is
7 dated March 10, 2009, that I sent to Mr. Edwards before
8 today?

9 A. I don't know.

10 Q. I'm sorry?

11 A. I don't know.

12 Q. Well, the letter was sent in March of 2009.
13 Are you saying that you, now having read the letter, it
14 doesn't -- you don't recall whether you saw that?

15 A. No.

16 Q. No, you don't recall one way or the other?

17 A. No, I do not recall.

18 Q. Okay. Turn -- flip the page. There was a
19 document -- the letter is -- and just so the record is
20 clear -- I'm enclosing a proposal for settlement in
21 order to resolve the action which has been filed by your
22 client. And then attached -- and that's paraphrasing --
23 attached to the letter is a proposal of settlement, sent
24 by Mr. Epstein to you, in the amount of \$45,000, plus
25 \$5,000 for attorney's fees.

1 Were you aware sometime in March of '09 that
 2 you were offered \$45,000 to resolve the case?
 3 A. Yes.
 4 Q. Okay. And did you understand that -- that
 5 if, in fact, Mr. Epstein comes back and gets an award of
 6 a sum something less than \$45,000, say \$30,000, or
 7 you're not successful in getting a judgment in excess of
 8 35 -- 30,000, \$32,000, that you'll be responsible -- or
 9 you may be responsible for all of Mr. Epstein's
 10 attorney's fees and costs that were incurred after the
 11 proposal for settlement?
 12 MR. EDWARDS: Form.
 13 BY MR. CRITTON:
 14 Q. That is that Mr. Epstein can get a judgment
 15 against you, maybe hundreds of thousands of dollars, are
 16 you aware of that fact?
 17 A. No.
 18 Q. Okay. And do you know that that will be
 19 against you for your entire life until you pay that off?
 20 MR. EDWARDS: Form.
 21 THE WITNESS: No.
 22 MR. HILL: How is that reasonably calculated
 23 to lead to admissible evidence?
 24 BY MR. CRITTON:
 25 Q. Ms. Jane Doe, we've talked about the first

1 the Court's order said that we could, if
 2 appropriate, go longer than seven hours. There are
 3 a number of additional areas that I want to cover
 4 with your client, including some background
 5 information that was not disclosed in her answers
 6 to interrogatories that I've not yet gotten to.
 7 I'd like to go into the other visits that she
 8 had with Mr. Epstein, that is who she saw, what
 9 occurred, both by her and with Mr. Epstein, and
 10 anyone else who may have been present at the time.
 11 I want to review the various counts of the
 12 complaint with her, separate and apart from the
 13 allegations of the various visits.
 14 There's some other background -- family
 15 background information I want to cover with her,
 16 and I want to cover with her any other areas of
 17 which she may have knowledge regarding witnesses,
 18 including with regard to either [REDACTED] issues, [REDACTED]
 19 issue, or potentially other individuals who are
 20 Plaintiffs in this case.
 21 There are some other additional, as I said,
 22 family background that I wish to explore, as well
 23 as the medical records, which I have not yet had an
 24 opportunity to discuss with her, which we obtained,
 25 and her school records.

1 time you went to Mr. Epstein's house and, I believe, the
 2 second time you went to Mr. Epstein's house; correct?
 3 MR. EDWARDS: Form.
 4 THE WITNESS: Yes.
 5 BY MR. CRITTON:
 6 Q. Okay. And you've testified that you went to
 7 Mr. Epstein's house another approximately 18 times; is
 8 that correct?
 9 A. Yes.
 10 Q. All right. And we have not discussed any of
 11 those events, at least as of this point today; have we?
 12 MR. EDWARDS: Form.
 13 THE WITNESS: I know that I have told you
 14 that every time I ever went to his house, he
 15 touched me, and I gave him a massage.
 16 BY MR. CRITTON:
 17 Q. Okay. But we talked about that generally; we
 18 haven't gone into each detail as to when the event
 19 occurred or what occurred at each of those massages;
 20 have we -- other than what you generally have told me;
 21 correct?
 22 MR. EDWARDS: Form.
 23 THE WITNESS: Correct.
 24 MR. CRITTON: I'm going to adjourn the
 25 deposition now. It is about five after 6:00, and

1 My best estimate for the time for completing
 2 her deposition is approximately two and half to
 3 three hours. If I can do it in a more reasonable
 4 or a quicker fashion, I will certainly do that.
 5 And as I advised you, Brad, I am going out of
 6 town on Friday. I'm in the process of moving my
 7 house. It's supposed to occur on Monday or Tuesday
 8 of next week. We -- it is now, as I said,
 9 6 o'clock. We started about a little before
 10 10 o'clock today. I think that the request is not
 11 unreasonable, and I will also have opportunity to
 12 have reviewed the transcript, so that I'm not --
 13 that I don't ask duplicative questions or retread
 14 some area that we've already covered that I think
 15 has been properly covered.
 16 As I indicated earlier is we spent almost
 17 eight hours with a person named [REDACTED], who was
 18 a house manager for Mr. Epstein for approximately
 19 six months, who was, I'd say, a small-time player.
 20 And this is a young lady who is seeking
 21 extensive damages, whose -- damages in excess of
 22 \$50 million for both compensatory and punitive
 23 damages. And I think we have a right to fully
 24 explore. It's certainly not the intent to harass,
 25 intimidate or to cause her any undue stress. I'll

1 be glad to work out a time that works for both you
2 and Ms. Jane Doe.

3 MR. EDWARDS: Just so that it is clear, we --
4 we will not be in agreement to your proposal. I
5 wrote down the various areas you intend to go into.
6 Every single one of them was covered. I will be
7 able to point to those areas in the transcript when
8 we have a hearing on this matter.

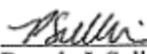
9 As you pointed out earlier, Mr. Critton, the
10 seven-hour time limit was relieved by way of the
11 consolidation order, and it was done in the context
12 of depositions that are going to require multiple
13 attorneys -- because there are so many attorneys
14 involved in this ultimate litigation -- multiple
15 attorneys to ask questions of a particular witness
16 whose deposition is going to exceed seven hours,
17 such as Mr. [REDACTED] who was asked questions by
18 all seven or eight attorneys. This witness is
19 being asked questions by one attorney. That was
20 not the intent of the Court's order, and I think
21 that Judge Marra is going to have to rule on that
22 issue again. Every single one of the issues that
23 you intend to go into was covered.

24 And I'd like to also put on the record that
25 in your last 15 minutes you proceeded to go into

1 CERTIFICATE OF OATH
2 THE STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5

6 I, the undersigned authority, certify that
7 JANE DOE personally appeared before me and was duly
8 sworn.
9

10 Dated this 13th day of October, 2009.
11

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16 Pamela J. Sullivan, RPR, FPR, CLR
17 Notary Public - State of Florida
18 My Commission Expires: June 10, 2010
19 My Commission No.: DD 560380
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1 proposals for settlement, which you know are not
2 admissible, nor reasonably calculated to lead to
3 admissible evidence, and you did that at your own
4 peril. And so, if we are going to resume any
5 deposition of Jane Doe, then it will be by way of
6 court order.

7 MR. CRITTON: We're done. end 6:09 p.m.
8 (Whereupon, the Deposition was suspended at
9 6:09 p.m.)
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1 CERTIFICATE
2 THE STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5

6 I, Pamela J. Sullivan, Registered Professional
7 Court Reporter and Notary Public in and for the State of
8 Florida at large, do hereby certify that I was
9 authorized to and did report said deposition in
10 stenotype, and that the foregoing pages are a true and
11 correct transcription of my shorthand notes of said
12 deposition.

13 I further certify that said deposition was taken at
14 the time and place hereinabove set forth and that the
15 taking of said deposition was commenced and completed as
16 hereinabove set out.

17 I further certify that I am not attorney or counsel
18 of any of the parties, nor am I a relative or employee
19 of any attorney or counsel of party connected with the
20 action, nor am I financially interested in the action.

21 The foregoing certification of this transcript does
22 not apply to any reproduction of the same by any means
23 unless under the direct control and/or direction of the
24 certifying reporter.
25

Dated this 13th day of October, 2009.

21 
22 Pamela J. Sullivan, RPR, FPR, CLR
23
24
25

1 October 13, 2009
2 JANE DOE
3 C/o BRAD J. EDWARDS, ESQUIRE
4 Rothstein, Rosenfeld Adler
5 Las Ocas City Centre, Suite 1650
6 401 East Las Ocas Boulevard
7 Fort Lauderdale, FL 33301

8 IN RE: SHORT STYLE
9 CASE NO.: 08-cv-80119-MARRA/JOHNSON
10 Dear Ms. Jane Doe:

11 Please take notice that on Wednesday, the SEP of
12 30, 2009, you gave your deposition in the above-referred
13 matter. At that time, you did not waive signature. It
14 is now necessary that you sign your deposition.

15 As previously agreed to, the transcript will be
16 furnished to you through your counsel or counsel for
17 Plaintiff. Please read the following instructions
18 carefully:

19 At the end of the transcript you will find an
20 errata sheet. As you read your deposition, any changes
21 or corrections that you wish to make should be noted on
22 the errata sheet, citing page and line number of said
23 change. DO NOT write on the transcript itself. Once
24 you have read the transcript and noted any changes, be
25 sure to sign and date the errata sheet and return these
pages to me.

If you do not read and sign the deposition within a
reasonable time, the original, which has already been
forwarded to the ordering agency, may be filed with
the Clerk of the Court. If you wish to waive your
signature, sign your name in the blank at the bottom of
this letter and return it to us.

Very truly yours,

Pamela J. Sullivan, RPR, FPR, CLR
Prose Court Reporting Agency, Inc.
One Clearlake Centre
250 S. Australian Avenue, Suite 1500
West Palm Beach, Florida 33401
561.832.7500

I do hereby waive my signature.

JANE DOE
JANE DOE

1 ERRATA SHEET
2 IN RE: JANE DOE V. JEFFREY EPSTEIN
3 CR: PAMELA J. SULLIVAN, RPR, FPR, CLR
4 DEPOSITION OF: JANE DOE
5 DATE TAKEN: September 30, 2009
6 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
7 PAGE # LINE # CHANGE REASON

Table with 4 columns: PAGE #, LINE #, CHANGE, REASON. Rows 8-19 are empty.

19 Please forward the original signed errata sheet to this
20 office so that copies may be distributed to all parties.

21 Under penalty of perjury, I declare that I have read my
22 deposition and that it is true and correct subject to
23 any changes in form or substance entered here.

23 DATE: _____

25 SIGNATURE OF DEPONENT: _____

1 CERTIFICATE

2 - - -
3 THE STATE OF FLORIDA
4 COUNTY OF PALM BEACH

5 I hereby certify that I have read the foregoing
6 deposition by me given, and that the statements
7 contained herein are true and correct to the best of my
8 knowledge and belief, with the exception of any
9 corrections or notations made on the errata sheet, if
10 one was executed.

11 Dated this ____ day of _____, 2009.

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JANE DOE