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September 29, 2009

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 502008CA028051XXXXMB AB

L.M.,

Plaintiff,

-vs-

VOLUME II OF II

JEFFREY EPSTEIN,

Defendant.

VIDEO-CONFERENCED AND VIDEOTAPED DEPOSITION OF L.M.

Thursday, September 24, 2009
9:40 - 5:52 p.m.

250 Australian Avenue South
Suite 115
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting

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18 ALSO PRESENT: Jeffrey Epstein, via video conference
19 Michael Downey, Videographer
20 Stanley Sanders, Videographer
21 Visual Evidence, Incorporated
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- - -

CONTINUED DIRECT EXAMINATION

THE VIDEOGRAPHER: We're back on the video record. The time is approximately 3:15 p.m.

BY MR. LUTTIER:

Q. Other than this woman K.G., is it your testimony that you brought to Mr. Epstein other people that were 12 years of age?

A. I have brought a couple girls over.

Q. Who?

A. I can't recall their name.

MR. EDWARDS: Speak up just because your microphones is low.

BY MR. LUTTIER:

Q. Do you -- can you describe them?

A. One had brown hair. They were very petite.

Q. Any more description you have of them?

A. I know one of, the girl with the brown her, her friend, she had told her friend about me.

Q. That is the brown haired girl told her friend about you?

A. Yes. And she went. She was really petite. I didn't need, I didn't, I didn't know, personally know many of these girls.

1 Q. Well, how do you, how do you know, for
2 example, the girl with brown hair, how do you know what
3 her age was?

4 A. Because I knew at the time.

5 Q. What did you ask her?

6 A. Yeah, she was K.G.'s friend.

7 Q. So, what you would do is you would ask the
8 girls how old they were, and if they said they were 12,
9 you would take them to Mr. Epstein's; is that what you
10 are saying?

11 A. Yes.

12 Q. So you knew the age of every girl before you
13 took them?

14 A. Yes, pretty much.

15 Q. Did you tell Mr. Epstein when you took them,
16 by the way, this is someone that is 12 years old?

17 A. He asked them how old they were.

18 Q. How do you know that?

19 A. Because I was right there.

20 Q. You were present in the room when this brown
21 haired girl was there when Mr. Epstein asked her how old
22 she was; is that your testimony?

23 A. Yes.

24 Q. Prior to today have you ever told anybody
25 that?

1 MR. EDWARDS: Objection, attorney-client
2 privilege.

3 BY MR. LUTTIER:

4 Q. Other than your lawyer have you ever told
5 anybody that, what you just said?

6 A. Not that I recall.

7 Q. Why not?

8 A. No.

9 Q. That would be an important fact, wouldn't it?

10 MR. EDWARDS: Object to the form.

11 THE WITNESS: It's so illegal.

12 BY MR. LUTTIER:

13 Q. Didn't happen, did it?

14 A. Excuse me?

15 Q. You, you, you didn't take any 12-year-olds to
16 Mr. Epstein and tell them that they were, him that they
17 were 12 years old, did you?

18 A. I personally did not tell Jeffrey Epstein that
19 they were 12 years old, but he asked them how old they
20 were.

21 Q. In fact, what you did was you specifically
22 told everyone you took there, don't tell Mr. Epstein
23 that you're less than 18 years of age; isn't that right?

24 A. No, that's wrong.

25 Q. Did you ever tell anyone in the world other

1 than your lawyer that you instructed everyone that you
2 took there not to tell Mr. Epstein what their age was?

3 A. The last deposition I did take, I was in fear
4 for my son and in fear for me. I was afraid of Jeffrey,
5 of his power, of his money. And when Goldenberger
6 (phonetic), I don't know his last name, when one of his
7 attorneys, the guy with the lip came into my house and
8 sat on my couch, he said you know your son is involved,
9 right? You know you have a son and that could
10 jeopardize him.

11 MR. LUTTIER: Move to strike as not being
12 responsive to my question. Would you read my
13 question back, please.

14 (The requested portion of the record was read
15 by the reporter.)

16 MR. LUTTIER: That's a yes or a no.

17 THE WITNESS: Yes.

18 BY MR. LUTTIER:

19 Q. And you told that to people from the FBI,
20 right?

21 A. Yes.

22 Q. And you told that to them under oath, correct?

23 A. Yes.

24 Q. Now, you don't know the name of this
25 brown-haired girl that you claim told you she was 12,

1 right?

2 A. No.

3 Q. And you specifically asked her, you said to
4 her, how old are you. And she said I am 12 and you
5 said, oh, well, come get in the car and I am going to
6 take you to see Mr. Epstein; is that right?

7 A. I didn't say come get in the car, but, yeah.

8 Q. Well, did you have to convince her to go?

9 A. Yes. I had to convince all these girls.

10 Q. How many times did you have to convince her?

11 A. I had to convince all these girls.

12 Q. Well, where did you find them? Where did you
13 find a 12-year-old?

14 A. It was [REDACTED] friend.

15 Q. Were you hanging around 12-year-olds back
16 then?

17 [REDACTED] A. No, they were in the neighborhood. I mean,
18 I hung out with [REDACTED], yes.

19 Q. Well, [REDACTED] was in the grade behind you, right?

20 A. I think a couple of grades behind me.

21 Q. So these are people from the mobile home park
22 where you lived?

23 A. No. They lived in Casa, Casa Delmonte.

24 Q. That's out at Forest Hill and Jog?

25 A. Yes.

1 Q. So, you went out and found 12-year-olds?

2 A. I found girls to bring.

3 Q. And took them to Mr. Epstein's?

4 A. Yes.

5 Q. But [REDACTED] this person, by the way, you keep
6 referring to as [REDACTED] --

7 A. I couldn't tell you.

8 Q. No. Do you, do you have a last name anywhere?

9 A. I don't know. I never knew her last name.

10 Q. Okay. What did she tell you about revealing
11 your age to Mr. Epstein?

12 A. I was scared to reveal my age to Mr. Epstein.

13 Q. Not my question. What did she tell you?

14 A. I am getting to that. I was scared to reveal
15 my age to Mr. Epstein. She said it was okay. It
16 doesn't matter. It doesn't matter. And I was scared
17 because I knew it was illegal, so I told Jeffrey and I
18 told her that I was going to tell Jeffrey that I was 17
19 because it was closer to 18.

20 Q. My question was what did [REDACTED] tell you to
21 tell Mr. Epstein about your age?

22 A. She said it didn't matter.

23 Q. That's your recollection of what she said?

24 A. Yes, she said -- I remember her saying it
25 doesn't matter. Don't worry about it.

1 Q. And have you ever told anyone ever anything
2 contrary to that statement; that is have you ever told
3 anyone that Carolyn told you something other than that
4 it didn't matter?

5 A. Yes.

6 Q. Who did you tell that to?

7 A. The last, the deposition.

8 Q. That would be the FBI you told?

9 A. Yes.

10 Q. And what you told the FBI was that [REDACTED]
11 told you don't disclose your age, correct?

12 A. Yes.

13 Q. Did she tell you not to disclose your age or
14 did she tell you to tell Mr. Epstein you were 18?

15 A. No. [REDACTED] told me it doesn't matter. She
16 said it doesn't matter how old you are. Let's just go.

17 Q. But you told the FBI what she said was don't
18 disclose your age to Mr. Epstein?

19 A. Correct.

20 Q. Or did you tell the FBI what she said was tell
21 him you're 18?

22 MR. EDWARDS: Objection, improper impeachment.
23 Why don't you show her the statement and refresh
24 your recollection.
25

1 BY MR. LUTTIER:

2 Q. Which did you do?

3 A. I told [REDACTED] I --

4 Q. I am telling what did you tell the FBI?

5 A. I told the FBI -- I lied to the FBI.

6 Q. You did?

7 A. Yes.

8 Q. Do you make a habit of lying to the FBI?

9 A. No.

10 Q. Do you know it's a federal offense to lie to
11 the FBI?

12 A. Now I do, but when my, when I was, I think I
13 was 17, or when I was 19 when I took the deposition.
14 And I was in total fear that my son was going to get
15 taken (sic) away from me.

16 Q. My question was did you lie to the FBI?

17 A. Yes.

18 Q. And you knew it was wrong to lie, didn't you?
19 Your parents probably -- you need to answer verbally.
20 You knew it was wrong to lie?

21 A. Yes.

22 Q. You were 19 years old, right?

23 A. Yes.

24 Q. Right, at the time? And you were already a
25 mother. You had a child, right?

1 A. Yes.

2 Q. And you were a woman of the world. I mean,
3 you had a child. You were out of school. You were off
4 doing your thing at that time, weren't you?

5 A. Yes.

6 Q. And you, you had familiarity with police
7 agencies before, hadn't you, at that time?

8 A. No.

9 MR. EDWARDS: Object to the form.

10 BY MR. LUTTIER:

11 Q. You had a few run-in's with the law earlier
12 because you had a few opportunities in your life prior
13 to having a statement that you gave to the FBI of your
14 involvement with law enforcement agencies, had you not?

15 MR. EDWARDS: Object to the form.

16 THE WITNESS: I, I don't understand what you
17 are saying.

18 BY MR. LUTTIER:

19 Q. You, you recall calling the cops for various
20 things before, haven't you?

21 A. Yes, I have.

22 Q. So you've had interaction with law enforcement
23 before you gave the statement to the FBI?

24 A. Yeah, and I know it's wrong to lie.

25 Q. And you knew the last person you wanted to lie

1 to is the FBI, right, or law enforcement?

2 A. When it comes to my son --

3 Q. You knew the last person to lie to would be
4 the FBI, wouldn't you?

5 A. No, I did not know that.

6 Q. The FBI didn't threaten anything about your
7 son, did they?

8 A. No.

9 Q. They didn't threaten you --

10 A. But Jeffrey's attorney did.

11 Q. They didn't threaten you with anything at all,
12 did they, the FBI?

13 A. No, Jeffrey's attorney did.

14 Q. Did the FBI threaten you in any manner
15 whatsoever?

16 A. No, Jeffrey's attorney did.

17 Q. We're going to get to that.

18 A. But you're throwing it off and you're totally
19 ignoring it.

20 Q. You're, you're claiming that the lawyer
21 representing you threatened you; is that what you are
22 telling us?

23 A. I don't know his specific name. And he -- I
24 don't know who he was exactly representing. I am not
25 knowledgeable about this whole court thing. I just know

1 he came to my trailer and he said, hey, Jeffrey got
2 caught. They found out that, you know, all these girls
3 were going to his house. And I was like, oh, my gosh.
4 Okay. So now what. And he is just like, well, I just
5 remember these exact words out of his mouth: He said,
6 well, just remember you have a little boy.

7 Q. This is something you are claiming now in this
8 lawsuit that the lawyer that represented you in your
9 statement to the FBI told you; is that right?

10 MR. EDWARDS: Objection to the form.

11 THE WITNESS: What is his name? Can you tell
12 me his name.

13 MR. LUTTIER: I believe his name is Eisenberg.

14 THE WITNESS: Eisenberg, with the lip.

15 MR. LUTTIER: I am assume he's got lips, but
16 he is your lawyer, not mine?

17 MR. EDWARDS: Objection to the form.

18 MR. LUTTIER: So, I just want to make sure
19 we're clear.

20 THE WITNESS: I was trying to save, I was
21 trying not to have my son be token (sic) away from
22 me.

23 BY MR. LUTTIER:

24 Q. That's not my question. You are telling us
25 under oath today that the lawyer that represented you at

1 the statements you gave the FBI threatened you; is that
2 right?

3 MR. EDWARDS: Objection to the form. And tell
4 him exactly what the lawyer said rather than use
5 the word threatened, unless the answer is you
6 threatened.

7 MR. CRITTON: Let's not testify.

8 THE WITNESS: He sat me down and he said, just
9 remember, you have a little boy and you know we
10 wouldn't want anything to happen there. You never
11 know what can happen.

12 So, as a mother, as any mother -- sorry -- as
13 any mother, I would do anything to protect my son.
14 So, I did lie to the FBI, and I did lie to many
15 people and said that Jeffrey didn't do anything.

16 BY MR. LUTTIER:

17 Q. And you lied to everybody until you filed this
18 lawsuit, right?

19 MR. EDWARDS: Objection to the form.

20 MR. LUTTIER: Is that right?

21 THE WITNESS: Correct.

22 BY MR. LUTTIER:

23 Q. And then since you the filed lawsuit, now
24 everything you say is the truth; is that right?

25 A. Correct.

1 Q. And before you filed the lawsuit, you had no
2 prospect, you had no thought of recovering money from
3 Mr. Epstein, right?

4 A. Before the lawsuit --

5 Q. Before you filed this lawsuit, you didn't have
6 any idea that you would recover any kind of money from
7 Mr. Epstein, did you?

8 A. I, I don't really care about money.

9 Q. Okay. But once you filed the lawsuit you
10 understood that what you were doing is you were going to
11 sue Mr. Epstein and try to get money from him, right?

12 A. Actually at that time I understood that we
13 were going to, we're were doing this for justice, and I
14 didn't know I was going to get any money from it.

15 Q. Who told you you were doing this for justice?

16 A. [REDACTED] told me we're definitely going to do this
17 for justice, and I want to do this for justice, and that
18 I didn't know, I didn't know that we were going to get
19 money out of this.

20 Q. Have you --

21 A. I am not knowledgeable on this stuff.

22 Q. So --

23 A. Now, I found out that, yes, there is money
24 involved.

25 Q. You, you didn't know that by filing a lawsuit

1 you were going to get money. That's what you are
2 telling the ladies and gentlemen of the jury, right?

3 A. Correct.

4 Q. Okay. And the first person that said anything
5 to you about anything in this lawsuit was that E.W. told
6 you that, that you were going to get justice by filing a
7 lawsuit?

8 A. Yes, because he was supposed to go to jail for
9 only 18 months or something, and that's ridiculous.

10 Q. Was she the one that came to you and told you
11 about filing a lawsuit?

12 A. No. I walked into her house one day and I saw
13 a calendar on a desk that said Jeffrey Epstein is going
14 to jail. And I said, why do you, why are you -- I
15 started like why are you even concerned about Jeffrey
16 right now. And she's like, well, you don't understand.
17 There is like a huge, you know, lawsuit going against
18 him. There is a huge, there is a whole bunch of
19 attorneys and this guy is in big trouble. And I was
20 like, oh, really. And I was like, well, what is going
21 on.

22 And we talked about it. And when we got to
23 talking, it kind of hit a spot in my heart that, that,
24 it hit a spot that he really did mess us up mentally and
25 our future. So, I said, wow, we do need to do something

1 about this.

2 Q. And about what date was this that this --

3 A. Oh, God.

4 Q. -- this meeting happened at [REDACTED]'s house?

5 A. I don't, I don't know.

6 Q. What year?

7 A. Maybe -- well, I contacted Brad Edwards maybe

8 like a month after that, so whenever that date was.

9 Q. Do you remember when -- I assume after you

10 contacted Brad Edwards, you retained him to represent

11 you?

12 A. Yes.

13 Q. Do you know approximately when you retained

14 Mr. Edwards to represent you?

15 A. No, I don't recall the date.

16 Q. What year?

17 A. Maybe early '08. I don't know though.

18 Q. Okay. And, and at that time was he already

19 representing [REDACTED]?

20 A. Yes.

21 Q. Is that how you got to him?

22 A. Yes.

23 Q. Now, let me go back to the meeting with E.W.

24 This is a meeting that happens at her house that you've

25 described?

1 A. Yes. It wasn't a called meeting, but it was a
2 discussion.

3 Q. Why were you going to her house on that
4 occasion?

5 A. Oh, I know I haven't saw her in a while, so I
6 think I was just kind of like, you know, going there and
7 reuniting with her in a way and seeing how life was.

8 Q. Had you maintained contact with her?

9 A. I have a family, sir. I don't really maintain
10 contact with any of my friends like really close
11 anymore. I just -- we talk once in a blue moon.

12 Q. I am talking about back then when you went to
13 see [REDACTED] Let's see if we can figure out what year was
14 this.

15 A. It wasn't too long ago.

16 Q. You said you saw something on [REDACTED] calendar?

17 A. I walked in and she was showing me her house.

18 Q. Okay. And her house was where?

19 A. On Fern, Fern, Fern, Fernly (phonetic). I
20 don't know. It's in Canvas States (phonetic).

21 Q. What did you say?

22 A. Canvas States.

23 Q. Can -- Canvas? Where is that?

24 A. I don't know how to spell that. I don't
25 even --

1 Q. What part? Is it West Palm?
2 A. West Palm Beach.
3 Q. Whereabouts, west, east?
4 A. It's actually next to Drexel Road.
5 Q. Oh, out near where your mobile home park is?
6 A. Yeah.
7 Q. Okay. All right. So you walk in her house?
8 A. Yeah, her and her boyfriend moved in together,
9 and maybe that's why I was there, to see the new house.
10 They were renting a new house and they were excited
11 about it. So I went there. And I remember she was
12 showing me her little office area because she was
13 cleaning at the time.
14 And I looked down and there was a big, you
15 know, one of those calendars that sit on a desk. There
16 was that and in a big square it said Jeffrey Epstein
17 went to jail.
18 Q. So, this was, apparently this meeting is
19 sometime after Mr. Epstein is sentenced?
20 A. I think so, yeah, because it said Jeffrey went
21 to jail. It might have said goes to jail.
22 Q. Now --
23 A. So I don't know.
24 Q. -- at that point in time, you -- I mean you
25 read the newspaper, right?

1 A. No.

2 Q. You never read the newspaper?

3 A. No.

4 Q. Did you know what was going on?

5 A. No, sir. I don't watch TV or read the
6 newspaper.

7 Q. You had already been interviewed by the FBI,
8 by then hadn't you?

9 A. Yeah, but they've never, they didn't contact
10 me after.

11 Q. So, you get interviewed by the FBI. And by
12 the way you had called Mr. Epstein to let him know that
13 the police were contacting you to ask you questions, did
14 you not?

15 A. I called him?

16 Q. You, you remember that, don't you? You
17 remember a police agency calling you and you telling
18 them that you didn't want to talk to them. And you
19 picked up the phone and called Mr. Ep -- Epstein to let
20 him know that the cops were asking questions, didn't
21 you?

22 A. I called Sarah.

23 MR. LUTTIER: Not my question. All right.
24 Strike that.

25

1 BY MR. LUTTIER:

2 Q. So you called Sarah. You called Sarah to tell
3 her what?

4 A. I called Sarah afterwards. No, excuse me. I
5 called Sarah when people started coming to my doors and
6 saying something about Jeffrey. And I was, I am pretty
7 sure it was after, after I had a deposition. And I did
8 talk to Sarah and I said, hey, are these people, I
9 didn't want to get in trouble. I was scared. And I
10 wanted to be on Jeffrey's side because I was scared.

11 And I said, are these people okay to talk to.
12 Am I -- you know, is everything okay? And she is like,
13 yeah, yeah, you can talk to them.

14 Q. As a matter of fact the reason why you wanted
15 to be on Jeffrey's side was you thought he was a nice
16 guy, didn't you?

17 A. No, I didn't think he was a nice guy.

18 Q. You told people he was a nice guy, didn't you?

19 A. The only reason I would ever tell anybody that
20 Jeffrey is a nice guy is if I was bringing a girl there
21 to make money and that makes plenty of sense.

22 Q. Did you tell people that Jeffrey was a nice
23 guy?

24 A. Yes.

25 Q. Did you tell them that he was respectful?

1 MR. EDWARDS: Object to the form. Are you
2 asking did she tell him that?

3 MR. LUTTIER: No, anybody.

4 BY MR. LUTTIER:

5 Q. Did you tell anybody that Jeffrey was
6 respectful?

7 A. I've told that in my deposition.

8 Q. When you say deposition, are you talking about
9 you told the FBI that under oath, right?

10 A. Yes.

11 Q. Okay. Now, you were contacted by the Palm
12 Beach Police Department, were you not?

13 A. I don't recall. I mean --

14 Q. And you said you told them you wouldn't talk
15 to them, didn't you?

16 A. Probably.

17 Q. And then you called [REDACTED] and told her that
18 the Palm Beach Police Department had called you asking
19 questions about Jeff, didn't you?

20 A. Yes, now --

21 Q. Because you wanted him to know that the cops
22 were asking questions?

23 A. Yes, yes, true.

24 Q. You didn't want him to get in any trouble, did
25 you?

1 A. I was cared.

2 Q. And you told the FBI, as a matter of fact,
3 that you thought it was unjust that anybody would punish
4 Mr. Epstein, didn't you?

5 A. I said that but it was a lie.

6 Q. Okay. Well, we'll get to that. We'll come
7 back to that.

8 A. Okay.

9 Q. So, you at least knew before you went to see
10 E.W. that the Palm Beach Police Department had called
11 you, that you had given a sworn statement to the FBI,
12 you -- and you had a conversation with [REDACTED] And you
13 are telling the ladies and gentlemen of the jury that
14 you didn't follow in the news at all, whether it was on
15 the news or on the Internet or in the newspaper, what
16 was going on in Mr. Epstein's case?

17 A. True, I did not. I saw his articles when he
18 did go to jail when it said that he only received 18
19 months or something. That was because E.W. did have it.
20 Other than that, I personally don't watch any TV or read
21 the newspaper, or follow-up on anything.

22 Q. So you --

23 A. Like, I don't even watch it now.

24 Q. So, you go over to [REDACTED] and the time that
25 you went to her house when you were looking at it that

1 you have described, had she already been to Mr. Edwards
2 by then?

3 A. Yes.

4 Q. So, at that meeting that you had in her house
5 on this occasion, is that when she told you about
6 Mr. Edwards and the fact that she had filed suit?

7 A. Yes.

8 Q. And what did she tell you about having filed
9 that suit?

10 A. Well, when we were having the discussion about
11 Jeffrey, she pretty much told me that, you know, this
12 has really messed me up. And we have lived a life of
13 lies and that there needs to be justice served because
14 if this was any regular person on the street that owned
15 a regular house and was walking in regular shoes, then
16 they would have been in jail way longer.

17 Q. And what --

18 A. So --

19 Q. -- did she say about recovering money?

20 A. We didn't, we didn't say anything about money.

21 Q. When you went to see Mr. Edwards, you signed
22 some kind of fee agreement?

23 MR. EDWARDS: Object to the form. We're
24 talking about a different lawsuit. She's talking
25 about one lawsuit. You're talking about a lawsuit

1 against Jeffrey Epstein. She's talking about a
2 lawsuit against the United States of America. Two
3 different things.

4 MR. LUTTIER: Let me go back.

5 MR. EDWARDS: So, so the wires are crossed
6 here.

7 BY MR. LUTTIER:

8 Q. The lawsuit that E.W. was talking about was
9 the lawsuit she had filed against Jeffrey Epstein.

10 A. I don't know what E.W. specifically filed. I
11 have heard from her mouth she said that I am going to
12 court on behalf, I have an attorney on behalf of Jeffrey
13 Epstein.

14 Q. On behalf of Jeffrey Epstein or against?

15 A. See, I don't even know these words. On --
16 against Jeffrey Epstein.

17 Q. And that attorney was Brad Edwards?

18 A. Yes.

19 Q. And that's why you went to Brad Edwards?

20 A. Yes.

21 Q. And when you went to Brad Edwards and retained
22 him, you signed a fee agreement, correct?

23 A. I signed -- I don't know if I signed a fee
24 agreement.

25 Q. Well, what's your arrangement with him in

1 terms of getting, paying his attorney's fees in this
2 case.

3 MR. EDWARDS: Object to the form. And I'm, I
4 am going to ask the witness not to answer this
5 question only because if we're talking about the
6 lawsuit against Jeffrey Epstein, she can answer as
7 to the fee arrangement. But if you're talking
8 about the time where L.M. signed, signed up with me
9 initially --

10 MR. LUTTIER: Don't give me, don't give me a
11 speaking objection. I know what you're saying. I
12 will clarify that.

13 MR. EDWARDS: -- we're talking about a
14 different lawsuit.

15 MR. LUTTIER: I understand.

16 BY MR. LUTTIER:

17 Q. Do you have a fee -- you have a fee agreement
18 with Mr., Mr. Edwards in this case, right?

19 A. Yes.

20 Q. And it's a percentage. What's called a
21 contingency fee, correct?

22 A. I don't know.

23 Q. Are you going to tell, are you going to tell
24 the ladies and gentlemen of the jury now you don't know
25 if you, if you agreed to pay Mr. Edwards a percentage of

1 what you recover as his fee?

2 A. Yeah, in general --

3 MR. EDWARDS: I am going to object,
4 attorney-client privilege.

5 THE WITNESS: Yeah, that's what happens.

6 MR. EDWARDS: Don't answer. I am going to
7 object to this as all attorney-client privilege.

8 MR. LUTTIER: Well, she's already answered so.

9 BY MR. LUTTIER:

10 Q. So, you understand what you are doing in this
11 lawsuit is you are suing to recover money, right?

12 A. Sir --

13 Q. Is that right?

14 A. I want justice.

15 Q. Yes or no. No, what you want is money.

16 A. No.

17 Q. That's what you want.

18 A. No.

19 Q. So if you --

20 MR. EDWARDS: Objection, argumentative.

21 BY MR. LUTTIER:

22 Q. If you get a zero in this case and the jury
23 just comes back and says Mr. Epstein shouldn't have done
24 what he did, you will feel like you got justice, and
25 that's all you want, right?

1 A. You know what, you damn right.

2 Q. Okay. So you don't want money in this case,
3 is that right?

4 A. Oh, it would help gratefully. But you know
5 what, I am in here for justice. I am not like you. I
6 am not defending a sex offender for money, no.

7 Q. You don't want money then?

8 A. Doesn't every, anybody want money?

9 Q. Right. So you are sue --

10 A. Are you, are you acting like I am in this for
11 the money?

12 Q. Ma'am, you are suing to recover money in this
13 case, are you not?

14 MR. EDWARDS: Object to the form, asked and
15 answered, argumentative.

16 BY MR. LUTTIER:

17 Q. Right? Yes or no.

18 A. I'm not going to answer this because it's
19 ridiculous. I want justice.

20 Q. Well, what do you call justice?

21 A. He needs time in jail. He doesn't want to
22 be -- this is not right for him to be on the streets
23 living daily --

24 Q. So that's all you want --

25 A. -- because he is going to do it again to many

1 other daughters.

2 Q. So, that's all you want is what you have now
3 described as justice, right?

4 A. Yeah.

5 Q. Now, has anybody explained to you that that's
6 not a possible outcome of this case, that Jeffrey
7 Epstein is not going to go to jail because of this
8 lawsuit?

9 A. Oh, God.

10 MR. EDWARDS: Object to the form, attorney
11 client-privilege. And I don't want you to answer
12 this line of questioning that obviously deals with
13 conversations between myself and yours.

14 BY MR. LUTTIER:

15 Q. Don't tell me about anything that you have had
16 a conversation with your lawyer. But has anybody
17 explained to you that there is no possibility that an
18 outcome of this lawsuit will be that Jeffrey Epstein
19 will go to jail?

20 A. Can you say that again?

21 Q. Has anybody explained to you that it is not
22 possible for the outcome of this lawsuit to be that
23 Jeffrey Epstein goes to jail?

24 A. No.

25 Q. Do you think that that's what is going to

1 happen in this lawsuit is that if you prevail Jeffrey
2 Epstein is going to go to jail?

3 A. I would hope so.

4 Q. So, so that's all you want in this lawsuit,
5 right?

6 A. You know what, you're asking like --

7 Q. Just a yes or no.

8 A. -- stupid questions.

9 Q. Do you understand my question?

10 MR. LUTTIER: Would you read the question back
11 to her.

12 (The requested portion of the record was read
13 by the reporter.)

14 BY MR. LUTTIER:

15 Q. So, you don't seek money or money in this
16 case?

17 A. Actually, after all this time and suffering, I
18 would love some money.

19 Q. Oh, so it's now just changed just in the five
20 minutes we have had this discussion, you have now
21 changed.

22 A. You made me realize that after all this, sure,
23 I would love some money.

24 Q. And that wasn't a realization that you just
25 came to. The day you filed this lawsuit, that's what

1 you wanted was money?

2 A. No, I didn't give a damn about no money.

3 Q. All right. So that just came --

4 A. You don't think that Jeffrey damaged me at
5 all? My whole life I was in prostitution because he
6 brought me into it because he showed me and taught me
7 how to do it? You don't think my whole life I have
8 lived that shitty life because of Jeffrey Epstein?

9 Q. Ma'am, I don't -- it would be inappropriate
10 for me to answer that question, so I will decline to
11 answer the question.

12 A. Yeah, because you know it's true.

13 Q. But you just changed your mind and decided
14 right here today that now you want money; is that right?

15 A. Yes.

16 Q. Okay. And when you had this conversation with
17 E.W., did you discuss that, that the possibility existed
18 to recover money?

19 A. We didn't talk about money, sir. I told you
20 this five times: We did not talk about money.

21 Q. What else did you discuss with E.W. about
22 filing a lawsuit?

23 A. That Jeffrey Epstein is going to get justice,
24 that we're going to get justice from him. That's all we
25 talked about. We talked about our past, how messed up

1 it was because of him, what he introduced us to. We
2 cried together about the things that we used to do with
3 him. That's what our discussion was about.

4 Q. And you never cried about the things that you
5 did with him until after E.W. and you filed lawsuits
6 against him; is that right?

7 A. Excuse me?

8 Q. You never had these discussions or cried about
9 the things that you did with him until you-all filed
10 these lawsuits?

11 A. Yes, of course we did.

12 Q. You mentioned earlier that you had gone to
13 some psychiatrists?

14 A. Yeah.

15 Q. What's the name of every psychiatrist that you
16 have gone to?

17 A. I saw Amy Swan one time.

18 Q. Who -- and where is Amy Swan?

19 A. I saw Amy Swan one time and that was -- I just
20 filled out papers.

21 Q. Where is Amy Swan located?

22 A. I don't know. She came to me.

23 Q. Came to you from where?

24 A. I don't know, sir. I didn't ask her where she
25 lived.

1 Q. Did you find it a little strange that a -- is
2 she a psychologist or psychiatrist?

3 A. I don't know, sir.

4 Q. Did she tell you what she was?

5 A. Sir, they sound the same to me.

6 Q. Do you have a habit of just talking to
7 people --

8 A. I just care --

9 Q. -- before --

10 A. -- for taking care of my son and like going to
11 school.

12 Q. Where did she come to see you?

13 A. She came to see me at my house and I went to
14 her to an office, it wasn't even hers, on Clematis
15 Street. We saw each other two different times. One,
16 like -- in two consecutive dates.

17 Q. And when was that?

18 A. Like a couple of months ago.

19 Q. And for what reason did you go to her?

20 A. To evaluate psychological things for the
21 Jeffrey Epstein case.

22 Q. So, you went to her for this lawsuit, that's
23 why you went to her?

24 MR. EDWARDS: Object to the form,
25 argumentative.

1 MR. LUTTIER: Correct?

2 THE WITNESS: I went for her, I went to her
3 for psychiatrist's help.

4 BY MR. LUTTIER:

5 Q. For this lawsuit?

6 A. Yes.

7 Q. You, you had -- you didn't get any treatment
8 from her, did you?

9 MR. EDWARDS: Object to the form.

10 THE WITNESS: That's what I initially went
11 there for was for treatment.

12 BY MR. LUTTIER:

13 Q. Have you ever received any treatment from her?

14 A. Yeah, for two days we went through
15 psychological --

16 Q. That was an evaluation, right? You never went
17 to psychotherapy with her or anything like that, right?

18 A. We talked.

19 Q. So, this was someone your lawyer sent you to,
20 wasn't it? Let's be honest.

21 A. Okay. Let's be honest.

22 Q. Did your lawyer send?

23 A. Yeah, jackass. You're a fucking asshole.

24 Q. Okay.

25 A. You are.

1 Q. So your lawyer sent you to this Amy Swan. Is
2 that the first psychologist or psychiatrist that you
3 went to see?

4 A. No.

5 Q. Who was the first one you went to see?

6 A. Her name is --

7 THE WITNESS: What was her name, Jerry? Can
8 you talk to me or you're not allowed to talk to me?
9 I don't know her name.

10 BY MR. LUTTIER:

11 Q. Another person your lawyer sent you to?

12 MR. EDWARDS: Objection, attorney-client
13 privilege.

14 THE WITNESS: No.

15 MR. EDWARDS: Do not answer.

16 THE WITNESS: He did not send me.

17 BY MR. LUTTIER:

18 Q. Who sent you to this Jerry person?

19 A. My -- E.W. was seeing her and said that she
20 was really good and that helped her out.

21 Q. When did you go see this Jerry person?

22 A. Over nine months ago, I think. Just about
23 nine months ago.

24 Q. And where did you go see her?

25 A. At the courthouse.

1 Q. At the courthouse?
2 A. Yeah. She had an office in the courthouse.
3 Q. Is this someone with Victim's Services?
4 A. Yeah, I think so.
5 Q. How many times did you go to her?
6 A. Three.
7 Q. And, and she didn't render any treatment to
8 you, did she?
9 A. No.
10 Q. And likewise Amy Swan didn't render any
11 treatment to you, correct?
12 MR. EDWARDS: Objection to the form.
13 THE WITNESS: Not yet.
14 BY MR. LUTTIER:
15 Q. And do you know Jerry's last name?
16 A. No, I'm not even sure if that was her name.
17 Q. Any other psychologists or psychiatrist that
18 you've seen?
19 A. No.
20 Q. And do you know when you went to see this
21 Jerry person?
22 A. Nine months ago, sir.
23 Q. So, it's -- would that be about January of '09
24 roughly?
25 A. If that's the correct math.

1 Q. Ma'am, you're the one who went to her. I, I
2 --

3 A. I told you nine months ago. You're asking me
4 what month. I don't know.

5 Q. Was it January --

6 A. Nine months ago.

7 Q. Was it January of '09?

8 A. Sure.

9 Q. Okay. And did you see Amy -- you saw Amy Swan
10 after that, right?

11 A. Yes.

12 Q. Any other psychologist or psychiatrist?

13 A. No, for the 15th time.

14 Q. Ever in your life?

15 A. Not that I recall.

16 MR. LUTTIER: Let's mark this as -- let's mark
17 this as Exhibit 1.

18 (Defendant's Exhibit No. 1 was marked for
19 identification.)

20 MR. LUTTIER: I am going to show you what's
21 been marked as Exhibit 1 which purports to be your
22 notice of service of your answers to
23 interrogatories that I will show your counsel
24 first.

25 After your counsel has looked at those, I want

1 you to take a look at those, and I have got a
2 couple of questions for you. Ma'am, I ask you to
3 look at those answers to interrogatories.

4 BY MR. LUTTIER:

5 Q. First thing I would like to ask you, if you
6 will turn to the last page of those interrogatories; is
7 that your signature on it? I, I don't have another
8 copy. Is that the last page?

9 A. Yeah.

10 Q. And you signed those under oath, correct?

11 A. Yes.

12 Q. And are they true and correct?

13 MR. EDWARDS: Read them. Take your time.

14 THE VIDEOGRAPHER: Mr. Luttier, can I go off
15 the record and change the tape?

16 MR. LUTTIER: Yeah, sure.

17 THE VIDEOGRAPHER: Going off the record at
18 3:53.

19 (A brief recess was held.)

20 THE VIDEOGRAPHER: We're back on the record at
21 3:56.

22 BY MR. LUTTIER:

23 Q. Have you had a chance to review your answers,
24 ma'am, that I have given you marked as Exhibit 1?

25 THE WITNESS: Haven't I read this before?

1 MR. EDWARDS: Probably.

2 THE WITNESS: This is going to take a long
3 time. I don't even know.

4 MR. EDWARDS: Take your time.

5 (A discussion was held off the record.)

6 THE COURT REPORTER: I couldn't hear their
7 conversation when they go off the record like that.
8 When they are whispering to each other, I can't
9 hear them.

10 BY MR. LUTTIER:

11 Q. Have you had a chance to review these answers?

12 A. No.

13 Q. Did you review them before you signed them?

14 A. Yeah.

15 Q. When you reviewed them when you signed them,
16 did you verify that they were true and correct?

17 A. Yeah, didn't you just tell me to go over them?

18 Q. Yeah, I just want to make sure --

19 A. Okay.

20 Q. -- when you signed them they were true and
21 correct.

22 A. Well, I am trying to go over.

23 Q. I am going to ask you about Interrogatories 11
24 and 12, but I want you to just turn to those and look at
25 them. All right. So, when you, when you received

1 Exhibit 1 before you signed --
2 A. How am I supposed to listen to you and read
3 this at the same time?
4 Q. Okay. Go ahead. Have you had a chance to at
5 least read Interrogatory 11 and 12?
6 A. Yes.
7 Q. Were all of these interrogatories that have
8 been marked as Exhibit 1, were they interrogatory
9 answers that you reviewed before you signed them?
10 A. Yes.
11 Q. Were they true and correct when you signed
12 them?
13 A. Yes.
14 Q. And you swore that they were true and correct,
15 correct?
16 A. Yes.
17 Q. All right. Let me ask you about Interrogatory
18 11. It asks you to name every physician including
19 psychiatrists and psychologists who have treated or
20 examined you for injuries that you seek for damages in
21 this case. And the person or the office you list is
22 Office of Palm Beach Doctors of Dr. Rishard. Who is Dr.
23 Rishard?
24 A. Dr. Rishard is, was one of my doctors.
25 Q. Are, is he -- have you spelled his name right,

1 because we have been unable to locate any Dr. Rishard?

2 A. I don't know if that's exactly how you spell
3 it, but it's definitely Dr. Rishard.

4 Q. What kind of doctor is Dr. Rishard?

5 A. He's right next to my OB/GYN. He is just a
6 physician. I don't know what kind of doctor.

7 Q. And where is his office located?

8 A. On -- that's on Sansbury.

9 Q. Sansbury and what?

10 A. Sansbury and Okeechobee.

11 Q. Is he still there?

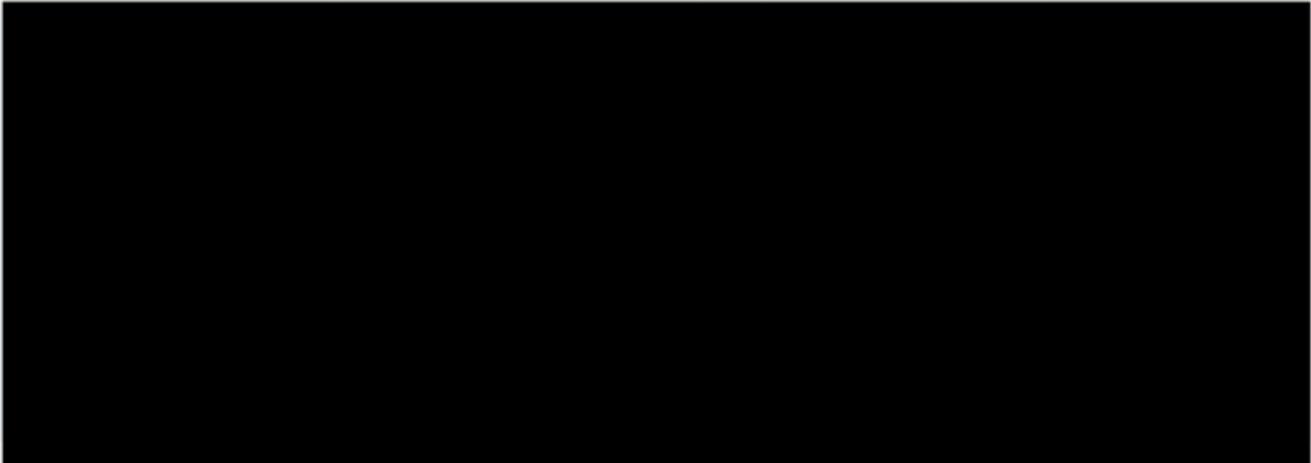
12 A. Yes.

13 Q. And when did you first see Dr. Rishard?

14 A. When I was 18.

15 Q. Okay. And for what purpose did you go to him?

16
17
18
19
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21
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24
25



1 Q. You mean, you say blacked out, b-l-a-c-k-e-d?
2 Blacked out is what you are saying?

3 A. Yeah.

4 Q. Okay. I didn't know if you were saying
5 blacked out or blocked out. I was just trying to
6 clarify.

7 A. Well, they are like the same thing blocked
8 out, blacked out.

9 Q. Okay.

10 A. And I had to put my son down and I just -- I
11 woke -- I got up. I had my eyes open and I was seeing
12 black spots. That's all I remember. And then I kind of
13 woke up out of it, and I was panicking for no reason.
14 And I would just have like major anxiety for no reason.
15 And this happened when I was, when I became seven months
16 pregnant. And it kept on progressing and progressing
17 and progressing.

18 And if I was -- I only really felt comfortable
19 in my house. And then if I was to go out, and if I see
20 anybody that I know, even if it was a good friend of
21 mine, I would panic. For some reason I would start
22 sweating. My heart would go fast. I felt really fainty
23 when I would drive, I would always feel fainty.

24 So, I went to the doctor and I just -- I don't
25 know why I went to him, but I just went to this doctor.

1 It's called Palm Beach Doctors.
2 Q. Do you know what kind of doctor he is?
3 A. He is a --
4 Q. Internist?
5 A. No.
6 Q. What is his specialty? I mean, he is not an
7 OB/GYN?
8 A. No.
9 Q. Do you know if he is an internist?
10 A. No.
11 Q. A psychologist?
12 A. No.
13 Q. Psychiatrist?
14 A. At first doctor -- it wasn't Dr. Rishard. It
15 was a different doctor and then that doctor transferred
16 to a different, to a different office and they kept on
17 giving me the same medication when Dr. Rishard became
18 the doctor.
19 But before this, I went to see the
20 acupuncture. And I got, you know, needles in me a whole
21 bunch of times but that only worked for a couple of
22 days. And then I would try Valerian root and Kava Kava
23 root, and nothing calmed me down. So I went to the
24 doctor to see what was up with my health. And he said
25 that I was having panic attacks and anxiety. So he

1 prescribed me Clozapine. And I started taking
2 Clozapine.

3 I believe I was 18. And my anxiety went away.
4 And the way, you know, I was, I wasn't afraid to drive,
5 and I wasn't afraid to go out in society. And then as
6 the Clozapine, they wore off, so he gave me an upper
7 dose of, I think it's like a .05. It's Xanax.

8 Q. Are you still on that drug now?

9 A. I don't, I haven't saw him because I don't
10 have as bad as anxiety as --

11 Q. You said you saw somebody before this
12 Dr. Rishard?

13 A. Yeah.

14 Q. Who was that?

15 A. There was someone in his office.

16 Q. That is at the office of Palm Beach Doctors?

17 A. Yes.

18 Q. And did you ever go to the hospital for this
19 condition? You said you blacked out in Publix. Did you
20 go to the hospital?

21 A. No, it was -- I was holding my son walking
22 through the aisle. And I felt really faint, so I set
23 him down. And the next thing I know, I woke, I kind of
24 like woke up from the black dots. And a lady had my
25 son. And I said, oh, my God, what happened. And she is

1 like, I don't know; you just like kind of fainted for --
2 it wasn't long. It wasn't even a minute and so --

3 Q. How many times did you go to the doctor that
4 you were seeing before Dr. Rishard?

5 A. Well, I went on a pretty much regular basis to
6 get my medication. But now, I don't -- I haven't saw
7 them for -- I haven't saw them for a while, for longer
8 than nine months. I know that for a fact because I have
9 been taking Kava Kava juice. It's not in a capsule
10 form. It's just Kava powder. And it relaxes you
11 whenever I have anxiety.

12 Q. Did you go to the acupuncturist before you
13 went to see these doctors at Palm Beach Doctors?

14 A. Yes.

15 Q. What acupuncturist did you go to?

16 A. To Jenny Lee.

17 Q. And where is Jenny -- is that J or G?

18 A. J.

19 Q. J-e-n-n-y?

20 A. Yes.

21 Q. L-e-e?

22 A. Yes.

23 Q. Where is her office?

24 A. She is located on Okeechobee but she also has
25 another office in Stuart with her husband.

1 Q. Well, which office did you see her in?
2 A. The Okeechobee office.
3 Q. Okeechobee and what?
4 A. Near Palm Beach Lakes. And she gave me a lot
5 of herbal remedies in capsules for anxiety.
6 Q. For what period of time did you go to her?
7 A. I only went to her, to her several times, two
8 or three times for acupuncture. And then she gave me,
9 you know, herbal remedies to take home, but that was --
10 yeah, that was before I went to the doctors.
11 Q. Do you still go to her?
12 A. No.
13 Q. So, you maybe went two or three times total to
14 her?
15 A. Oh, in the past when I was younger, I went to
16 her. Like when I was ten years old, I went to her
17 before because pink eye or something.
18 Q. Do you -- and you regularly used
19 acupuncturists since you were a kid?
20 A. Yes.
21 Q. How about this, the doctor that preceded
22 Dr. Rishard, had you ever been to that doctor before the
23 incident with the blackout?
24 A. No.
25 Q. Had you been to Rishard any time prior to the

1 time that you went because of the blackout?
2 A. No, I have never.
3 Q. How many times do you think you went to
4 Rishard roughly? That is --
5 A. Well, he was my doctor.
6 Q. When I say went to him, I mean you went in and
7 had an office visit.
8 A. Yeah, I, he was my doctor at the time so --
9 Q. Was he your general practitioner; that is any
10 time you had --
11 A. All he did was prescribe my medication.
12 Q. Did he just treat you for these blackouts?
13 A. He treated me for anxiety. That's what it
14 was.
15 Q. He, he wasn't the guy that you ended up that
16 you went to if you had something other than OB/GYN
17 stuff, unlike your treating physician, your regular GP
18 that you would call if you had problems?
19 A. No. He was a regular doctor like that, but I
20 never went for him because I didn't have any problems.
21 Q. Okay. And what was the -- and you say it's at
22 least nine months since you've seen him?
23 A. Yes.
24 Q. Are you still on any prescription medication
25 from him?

1 A. No.

2 Q. I assume that when you went to see him and the
3 acupuncturist and whatever doctor preceded him, that you
4 told them honestly whatever your medical history was?

5 A. Yes.

6 Q. Okay. Are there -- are you on any prescribed
7 medicines now?

8 A. No.

9 Q. Had -- when was the last time you had a
10 prescription for medication?

11 A. When Dr. Rishard prescribed it to me. Like I
12 said, I don't recall the date but it was longer than
13 nine months ago.

14 Q. Prior to Rishard prescribing the medication
15 for your anxiety, had you had any other prescription
16 drug? And by that I mean, I don't mean like antibiotics
17 that may have been prescribed for you for some short
18 period.

19 A. He, actually he diagnosed me with depression,
20 and he gave me the pills for it, but I never took them.

21 Q. Okay.

22 A. I never.

23 Q. Other now than Amy Swan and this Jerry person
24 at Victim's Services, have you seen any other
25 psychiatrist or psychologist ever?

1 A. No. The only thing, and I don't even think it
2 was a psychiatrist. It was like counseling.

3 Q. Counseling with who?

4 A. I went, I was at a counselor because I got
5 caught smoking weed in school, but that's --

6 Q. Who was that?

7 A. Oh, it was -- I forgot the name. It was in
8 Palm Beach Gardens. I think it started with a C, but I
9 don't know. That was in seventh grade in Duncan Middle,
10 so --

11 Q. Have you ever been treated as opposed to
12 simply evaluated by a psychologist or psychiatrist ever
13 in your life?

14 A. Not yet.

15 Q. In interrogatory 12, it asked you to list ever
16 other physician that you have seen for a period of 10
17 years. Have you seen any physicians other than those
18 that are listed in Answer to Interrogatory 12, adding to
19 that list Jenny Lee, Amy Swan, Jerry at Victim's
20 Services, and whoever the doctor --

21 A. If that's her name.

22 Q. -- was before Dr. Rishard. Anybody else?

23 A. This is of my best knowledge.

24 Q. Okay. You have Planned Parenthood listed
25 here. For what reason -- first of all, where did you go

1 to Planned Parenthood?
2 A. Where?
3 Q. Yeah.
4 A. Palm Beach Lakes.
5 Q. And what?
6 A. Village.
7 Q. And for what reason did you go to Planned
8 Parenthood?
9 A. Because I didn't have an OB/GYN at the time.
10 Q. When did you go there?
11 A. I went there a couple of times just for
12 checkups. I can't tell you. I have been there when I
13 was -- actually they gave me my pregnancy test when I
14 was 16.
15 Q. Was that the first time that you had been
16 there?
17 A. No.
18 Q. So, you had gone sometime prior to that?
19 A. Yeah.
20 Q. Did you get birth control pills?
21 A. Yes.
22 Q. Was that the reason you initially went to
23 them?
24 A. No. I went there initially just to get a
25 checkup.

1 Q. An OBG, a gynecologic exam?
2 A. Yeah.
3 Q. Do you remember how old you were?
4 A. I was, I was probably early 15.
5 Q. Okay. Was there a reason why you were, you
6 went there to get a gynecologic exam at age 15?
7 A. No. I was sexually active.
8 Q. Were you concerned at that point that you may
9 have contracted some sort of sexually transmitted
10 disease?
11 A. No, I just, my mother said you should go get a
12 checkup.
13 Q. When you said you were sexually active, you
14 were sexually active, what do you mean by that?
15 A. I was having sex.
16 Q. Intercourse?
17 A. Yes.
18 Q. And, and if you went there at 15, was that
19 when you began to be sexually active or were you
20 sexually active before you went there?
21 A. Before I went to Planned Parenthood?
22 Q. Before, yeah.
23 A. I was sexually active before I went to Planned
24 Parenthood.
25 Q. Do you remember at what age you started sexual

1 activity?

2 A. I was 14.

3 Q. Do you recall the first time that you were
4 sexually active?

5 MR. EDWARDS: Object to the form. I am going
6 to instruct her not to answer based on the privacy
7 objections that we stated earlier. And this is,
8 this is a portion of the appellate issue that's
9 being decided relative to Interrogatory No. 19
10 where you have asked the nature of every sexual
11 activity from 10 up through the current date.

12 THE WITNESS: You've, you've asked me this
13 earlier.

14 MR. LUTTIER: Okay. Well, I am not going
15 to --

16 BY MR. LUTTIER:

17 Q. Do you know a person by the name of Jane Doe?

18 A. Jane Doe, yes.

19 Q. Yes?

20 A. Yes.

21 Q. When was the last time you had contact with
22 Jane Doe?

23 A. Actually about three months ago.

24 Q. And for what purpose did you have contact with
25 her?

1 A. She watched my son when I went to school.

2 Q. And you are at the health school?

3 A. Yes.

4 Q. By the way, you said you got a loan from the
5 health school?

6 A. Yes.

7 Q. And what's the loan for?

8 A. Well, I am not working right now, so --

9 Q. How much did they lend you?

10 A. They lended me -- well, they granted me 2,500.

11 Q. As a, like a scholarship?

12 A. No, it's a grant.

13 Q. To pay tuition?

14 A. Yes.

15 Q. Okay. 2,500 for tuition. Do they give you
16 any money?

17 A. Yeah, they granted me 2,500.

18 Q. And you used, did you use that to pay for your
19 tuition?

20 A. Yes.

21 Q. All right.

22 A. And the tuition was five, around five grand.
23 And then I received a loan from them for around 4,200
24 ballpark.

25 Q. When you say you received a loan, does that

1 mean they gave you \$4,200 in cash?

2 A. Yes.

3 Q. What did you do with that money?

4 A. I still have it.

5 Q. Is it earmarked for some particular purpose?
6 In other words when they lent you the money, did they
7 lend you the money and say you have to use it for
8 certain things?

9 A. No, sir. I don't have to use it for certain
10 things. I can use it for -- I am going to use it for my
11 bills.

12 Q. When you say you still have it, is it in the
13 bank?

14 A. Yes.

15 Q. What bank?

16 A. Riverside.

17 Q. And is that where you have done all your
18 banking since you have had bank accounts?

19 A. Yes.

20 Q. What branch?

21 A. The one on Okeechobee and Belvedere. They
22 recently just relocated onto Forest Hill and, Forest
23 Hill and Florida Mango. But I did try a different
24 branch for about three months and I didn't like it. So
25 I went back to Riverside recently.

1 Q. And is Jane Doe a friend of yours, Jane Doe?

2 A. Yeah.

3 Q. Did you take her to see Jeffrey Epstein?

4 A. Yes.

5 Q. And obviously then, how long have you known
6 Jane Doe?

7 A. For, 14, 15, 18, 19, 20, seven years now.

8 Q. How did you know her? Did she grow up in your
9 neighborhood?

10 A. I met her through E.W.

11 Q. Did [REDACTED] grow up in your neighborhood?

12 A. No.

13 Q. And did you talk to Jane Doe about this
14 lawsuit?

15 A. Have we recently?

16 Q. Yeah, at any time.

17 A. Yeah, she actually knows more about it than I
18 do. She's, she watches the news and stuff and --

19 Q. Did you, did you send her to her lawyer?

20 A. No. I think she had --

21 Q. Is she represented by Mr. Edwards too?

22 A. Yes, she had Brad.

23 Q. She already had him?

24 A. Yeah.

25 Q. You were the last of you and [REDACTED]?

1 A. Yeah.

2 Q. Did you know that Jane Doe was represented by
3 Mr. Edwards when you went to see him?

4 A. Yes, I think so.

5 Q. And how did you know that?

6 A. I think [REDACTED] had told me. This is all of, I
7 think, I'm not sure but I did, originally I did, you
8 know.

9 Q. Have you Jane Doe and [REDACTED] ever met and
10 discussed the lawsuit?

11 A. All three of us, no.

12 Q. Ever?

13 MR. EDWARDS: Object to the form, asked and
14 answered.

15 BY MR. LUTTIER:

16 Q. Have you, Jane Doe, you, Jane Doe and E.W.
17 ever been, all three of you together --

18 A. No.

19 Q. -- in the last three years?

20 A. In the last three years?

21 Q. Yep.

22 A. No. I don't recall. I don't, no, because we
23 don't, we're not like that. We don't really hang out
24 like that.

25 Q. Well, you, I assume you trust Jane Doe because

1 you use her to watch your child, right?
2 A. Yeah, but that doesn't mean that we have to be
3 together all three of us.
4 Q. So you must have her phone number?
5 A. I have Jane Doe's phone number.
6 Q. Speaking of phone numbers, you said earlier
7 that you called your mother at the lunch break?
8 A. Yes.
9 Q. What phone did you use to do that?
10 A. My phone.
11 Q. Your cellphone?
12 A. Yes.
13 Q. What's your cellphone number?
14 A. [REDACTED].
15 Q. And did you call anyone else?
16 A. I called my boyfriend just to tell him how I
17 was.
18 Q. Did you call anyone else?
19 A. My mother and my boyfriend.
20 Q. Anybody other than your mother?
21 A. Oh, I tried to call my father, but he didn't
22 answer.
23 Q. Since you came to this deposition today, have
24 you called anyone other than your mother and your
25 boyfriend and attempted to call your father?

1 A. No.

2 Q. Have you had any discussions with Jane Doe
3 about the lawsuit?

4 A. Not about the lawsuit. More, well, I guess it
5 would be about the lawsuit but more of how we feel about
6 Jeffrey.

7 Q. Has Jane Doe ever said anything to you
8 questioning why you took her to Jeffrey Epstein?

9 A. Not that I recall.

10 Q. Had she ever said that she would sue you as a
11 result of you taking her to Jeffrey Epstein?

12 A. No.

13 Q. Has [REDACTED] ever questioned you as to why you
14 took her to Jeffrey Epstein?

15 A. No.

16 Q. Has E.W. ever told you that she would sue you
17 for taking her to Jeffrey Epstein?

18 A. No.

19 Q. Do you know [REDACTED]?

20 A. Not that I recall.

21 Q. Do you know [REDACTED]?

22 A. I know [REDACTED], yes.

23 Q. How do you know [REDACTED]?

24 A. From Central High School.

25 Q. Was she in your class?

1 A. I don't know if she was in one of my classes.
2 I don't think so, because she's older than me -- I am.

3 Q. Was she -- okay. She, she was a class ahead
4 of you?

5 A. Yes.

6 Q. One class ahead of you or more than one class?

7 A. I think one, just one.

8 Q. And did you know her before you met her at
9 Palm Beach Central?

10 A. No.

11 Q. And did you take her to Jeffrey Epstein?

12 A. Yes, I did.

13 Q. And did you ask her to go to Epstein as a
14 result of knowing her at school?

15 A. Yes.

16 Q. When was the last time you talked to [REDACTED]?

17 A. Years, I only strictly talked to her for
18 Jeffrey Epstein.

19 Q. How many times did you take her?

20 A. From what I recall two and then he got her
21 number.

22 Q. That meant that if she went after that, you
23 didn't get paid \$200?

24 A. True.

25 Q. Do you know if she went more than two times?

1 A. I heard that she did.
2 Q. Who did you hear that from?
3 A. I heard it through just the grapevine through
4 the girls that I would bring, and also Jeffrey told me
5 that he had received her number from her.
6 Q. Do you know [REDACTED] parents?
7 A. No.
8 Q. Do you know any of her siblings?
9 A. I went to school with her sister.
10 Q. And when was the last time you communicated
11 with her sister?
12 A. We were never friends or really even
13 acquaintances. I haven't talked to her sister.
14 Q. Have, have you had any conversations with her
15 since you filed this lawsuit?
16 A. No. I, I think I tried to get a hold of a
17 couple of girls on MySpace. I know I have tried to get
18 a couple of girls on MySpace to tell them what's been
19 going on, but I don't think I tried to contact S.E.
20 specifically.
21 Q. Who did you try to contact on MySpace?
22 A. R.S.
23 Q. Who?
24 A. R.S.
25 Q. Do you know what Briana's (phonetic) last name

1 is?

2 A. No.

3 Q. Oh, [REDACTED]?

4 A. [REDACTED]

5 Q. Were you successful in contacting her?

6 A. Yeah.

7 Q. When did you get a hold of her?

8 A. Around, maybe not too long ago, seven months,

9 six months.

10 Q. Did you, after you took [REDACTED] to Mr. Epstein,

11 did you have conversations with her when you took her

12 back home?

13 A. I know that she didn't like it.

14 Q. Did you have conversations with her when you

15 took her back home?

16 A. Not really. It was kind of silent. She

17 didn't like it. I would ask her to come back.

18 Q. Well, did she tell you something that made you

19 conclude she didn't like it?

20 A. Yeah, she said that she never wanted to go

21 back.

22 Q. This was after you took her how many times?

23 A. I recall taking her two times.

24 Q. And then she communicated directly with

25 Mr. Epstein?

1 A. I heard that from girls. I am not positively
2 sure.

3 Q. What did you tell [REDACTED] before you took her?

4 A. I told her that it was going to be easy and
5 that we were going to make \$200 --

6 Q. Did you tell her --

7 A. -- massage --

8 Q. I am sorry. I didn't mean to cut you off.

9 A. -- massaging Jeffrey.

10 Q. Did you tell her the other things that you
11 said earlier in the deposition that you told all the
12 girls?

13 A. I said, I made it sound real nonchalant. I
14 said that he was just going to roll over and that maybe
15 he might ejaculate, but it's not a big deal. And I was
16 trying to make it seem that it wasn't a big deal.

17 Q. In fact, it wasn't a big deal to you, right?

18 MR. EDWARDS: Object to the form.

19 THE WITNESS: It very much was a big deal. It
20 was, I felt like it was horrible.

21 BY MR. LUTTIER:

22 Q. Well, it wasn't the first time you saw a man
23 ejaculate, was it? Jeff Epstein wasn't the first time
24 you saw a man ejaculate, was it?

25 MR. EDWARDS: Object to the form. I am

1 instructing the witness not to answer. This deals
2 with the same privacy issues.

3 BY MR. LUTTIER:

4 Q. Did you tell [REDACTED] that, that she was going to
5 be topless?

6 A. Yes.

7 Q. Did you tell her she was going to be topless
8 or did you tell her she was going to be naked?

9 A. I just told her topless because she was one of
10 the girls that I could tell it was going to be hard to
11 persuade her.

12 Q. Well, what made you believe it would be hard
13 to persuade her?

14 A. Because she already has money.

15 Q. But you, despite your experiences and
16 everything, you represented to her that this was going
17 to be a good thing and everything was going to be okay,
18 right?

19 A. Yes.

20 Q. When you say she has money, what do you mean?

21 A. She always had nice clothes. She always had
22 her hair done. She always had her nails done. She
23 lived in Wellington, so --

24 Q. So, why would she want to go to Mr. Epstein's?

25 A. I don't know. Ask her.

1 Q. Why did you ask -- what did she tell you?

2 A. She said, sure, I will try. I don't really
3 remember. I brought over, like, a lot of girls, over
4 60, 70 girls.

5 Q. Other --

6 A. I can't remember everything each one of them
7 told me.

8 Q. Other than [REDACTED] sister, did you know any
9 other members of her family?

10 A. Not that I know of.

11 Q. Did you-all have mutual friends?

12 A. They weren't really friends. They were
13 strictly for Jeffrey.

14 Q. Did you know of any of her boyfriends?

15 A. Not that I know of.

16 Q. Did you -- and you told [REDACTED] before she went
17 that Mr. Epstein was going to ejaculate?

18 A. I think so.

19 Q. And what specifically, other than you say [REDACTED]
20 said she didn't like it, did she tell you about her
21 experiences?

22 A. I remember that we did walk at the end of
23 Albrillo Street. And I had asked her, so was everything
24 okay; did everything go fine. And she was just really
25 quiet about the situation. She was really quiet. And I

1 just remember she's like, I just, I don't want to do
2 this again. And then that's pretty much it, we --

3 Q. Was --

4 A. And she didn't talk to me after.

5 Q. Was this after the first time or after the
6 second time?

7 A. Both.

8 Q. So if she said she didn't want to do it again
9 after the first, but you went and persuaded her --

10 A. If, if I did bring her a second time. Like I
11 said, I don't recall. I don't remember. It might have
12 been two times.

13 Q. Do you know, do you know it was not more than
14 two times?

15 A. Yeah, definitely not more than two times.

16 Q. Do you know whether she ever went more than
17 the number of times you took her?

18 A. No.

19 Q. And did you say she never talked to you again?

20 A. True. She didn't -- we didn't associate with
21 each other. She just -- we weren't, we weren't our type
22 of people. And, but I think it was around like a year
23 later, I was invited to a house party. And it was like
24 a huge house and a huge house party and she was there.
25 Other than that, I didn't talk to her.

1 Q. Did you talk to her at this party?

2 A. I said hi, you know, how are you. But we
3 didn't -- I could tell we had kind of a tension there
4 because she didn't want to go to Jeffrey's house and I
5 kind of like forced it upon her.

6 Q. Did you tell her your were getting paid \$200
7 to take her there?

8 A. I don't know if I told her that.

9 Q. Okay. [REDACTED] did you take her to
10 Mr. Epstein's?

11 A. Yes.

12 Q. How many times?

13 A. Her, I know I took -- well, I definitely took
14 her. I don't want to tell you how many times because I
15 don't know. Maybe once or twice, but he also received
16 her number as well.

17 Q. How do you know that?

18 A. Through girls. And when I kept on calling
19 her, she wouldn't answer the phone. And I heard that
20 she had went there with one of her friends, that she
21 started bringing girls.

22 Q. And getting paid for it?

23 A. Yeah.

24 Q. What did you tell her was going to happen
25 before you took her for the first time?

1 A. The same thing I told all the girls. I said
2 we're going to massage a guy, and it's not going to take
3 that long. And it's going to be really quick. I tried
4 to persuade them so they could just get there. And I
5 said he might ejaculate at the end, but it's not going
6 to be a big deal.

7 Q. Well, well, what did [REDACTED] say to you when you
8 said that this person that she was going to give a
9 massage to might ejaculate at the end?

10 A. It's definitely absurd.

11 Q. What do you mean absurd? Is that what you
12 said to her?

13 A. No. I say that I think it's definitely
14 absurd. I don't know how I got these girls to go.
15 Until this day I don't understand how I convinced these
16 girls to go.

17 Q. That's not my question.

18 A. What [REDACTED] said, I don't remember her exact
19 words. I just know that she ended up going there with
20 me.

21 Q. Well, did she sound surprised?

22 A. Of course.

23 Q. You say of course. Do you have a specific
24 recollection that she sounded surprised?

25 A. Oh, she wasn't like, oh, he's going to

1 ejaculate, okay, let's go, whoa-who, no. She was like,
2 oh, my God, yeah.

3 Q. Oh, my God, yeah, like that's okay, let's go
4 do it?

5 A. No, sir. She said --

6 Q. Did she say no?

7 A. Oh, my God. I don't know exactly what she
8 said but she came with me.

9 Q. Have you had any discussions with her about
10 the lawsuit?

11 A. No.

12 Q. Do you know a lady by the name of [REDACTED]?

13 A. Not that I recall.

14 Q. Do you know a lady by the name [REDACTED]?

15 A. That sounds very familiar.

16 Q. How do you know her?

17 A. I don't know. That sounds familiar. No, I
18 don't know her.

19 Q. Do you know a lady by the name of [REDACTED]?

20 A. No.

21 Q. Do you know a lady [REDACTED]?

22 A. That sounds familiar too.

23 Q. How do you know her?

24 A. I don't know. It just sounds familiar to me.

25 Q. How about [REDACTED]?

1 A. I don't know her.

2 Q. Her middle name is [REDACTED]

3 A. Many girls that I brought, I -- it was just so
4 many years that I have just brought these girls on like
5 a regular basis that, and they only went one time, so I
6 didn't really care to know their name.

7 Q. Well, you, you recorded the name on some list,
8 didn't you?

9 A. Yes, I could call them and say hi, not just,
10 oh, hey, dude, let's go.

11 Q. You called them to say do you want to go back,
12 right?

13 A. Yeah.

14 Q. And some of them said sure and you took them
15 back, right?

16 A. Yes.

17 Q. Do you know [REDACTED] Do you also know J.P.C.

18 A. A lot of these names sound familiar to me, but
19 I personally don't know them.

20 Q. How about Jane Doe 102, you know her, don't
21 you?

22 A. No.

23 Q. You never heard of Jane Doe 102?

24 A. No.

25 Q. By the way --

1 A. Maybe the nickname.
2 Q. -- do you consider your mother to be truthful?
3 A. Yes.
4 Q. Have you ever know your mother to lie?
5 A. No.
6 Q. You and she have always been honest with each
7 other?
8 A. Yes.
9 Q. What was your mother's occupation?
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 Q. Do you know your mother to have had any type
15 of employment or any other work that she did for which
16 she received money other than [REDACTED]
17 [REDACTED]
18 A. Nope. [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 Q. Did she ever tell you where she worked?
25 A. I know she actually was like half owner of, of

1 a, of a spa. That's when I was, I think I was around
2 eight years old maybe. I don't remember the name. But
3 she owned it with one of her friends I guess. And then
4 the whole time like when we were at school, she worked
5 outside or inside the house.

6 Q. This spa that you're talking about, do you
7 remember the name of that spa?

8 A. I just told you no.

9 Q. And to the best of your knowledge did your
10 mother, when she was doing this massage therapy, did she
11 perform any sexual activity for any of the people that
12 she was doing the massages on?

13 MR. EDWARDS: Object to the form.

14 THE WITNESS: No.

15 BY MR. LUTTIER:

16 Q. Was your mother ever a prostitute?

17 MR. EDWARDS: Object to the form.

18 THE WITNESS: No.

19 BY MR. LUTTIER:

20 Q. Has, has your mother ever told you she was a
21 prostitute?

22 A. No.

23 Q. Have you ever heard that your mother was a
24 prostitute?

25 A. No.

1 Q. Have you at any time in your lifetime seen
2 pornographic films?

3 A. Yes.

4 Q. And when do you recall being the first time
5 you saw pornographic films?

6 A. I don't know. Maybe when I was 14 or so.

7 Q. Do you recall where you saw those?

8 A. Not at all.

9 Q. And how do you have a recollection that you
10 saw them at 14?

11 A. I have known that I have saw, you know, pornos
12 before, but I don't know the date and time and the
13 month, no.

14 Q. Who showed you? How did you get access to
15 porn at age 14?

16 A. I was probably curious and wanted to see.

17 Q. So, how did you get access to them?

18 A. I don't know if it was a tape. I don't know
19 if it was the Internet.

20 Q. Well, let's see. Were you on the Internet at
21 age 14?

22 A. Maybe one of my friends was. I don't know,
23 sir. I don't know.

24 Q. Did you have access to a computer at age 14?

25 A. My father had a computer. My father always

1 had a computer, but I, I never -- I only went on it to
2 do school work.

3 Q. Did you ever see pornography in any residence
4 where your mother resided?

5 A. Not that I recall.

6 Q. With what degree of frequency did you see
7 porno starting when you're 14?

8 A. I was never a little boy, so I wasn't really
9 interested in --

10 Q. Do you recall when --

11 A. -- watching porno.

12 Q. -- you saw it next after you saw it first at
13 14?

14 A. No. I am not like a frequent porno watcher.

15 Q. Did you get the idea of filming yourself in a
16 sex act from watching some --

17 A. No.

18 Q. -- pornography?

19 A. It was just out of fun.

20 Q. Okay. Do you know Jane Doe 101?

21 A. No.

22 Q. How about Br.Be.?

23 A. Yeah.

24 Q. How do you know her?

25 A. I went to school with her. I don't even

1 remember her face, but I know that I went to school with
2 a Br.Be.

3 Q. That would be Palm Beach Central?

4 A. I don't know.

5 Q. Did you bring her to Mr. Epstein?

6 A. I don't know. Did I? I don't know.

7 Q. When was the last time you had communication
8 with her?

9 A. I just recognize the name. The name is
10 familiar to me.

11 Q. Do you know [REDACTED]?

12 A. No.

13 Q. You mentioned earlier that there was a friend
14 of yours that had been killed. Do you recall that?

15 A. Yes.

16 Q. Who was that?

17 A. [REDACTED]

18 Q. [REDACTED]

19 A. [REDACTED]

20 Q. [REDACTED]

21 A. [REDACTED]

22 Q. [REDACTED]

23 A. [REDACTED]

24 Q. [REDACTED]

25 A. Maybe February, February.

1 Q. What were the circumstances of her death?
2 A. What do you mean circumstances?
3 Q. How did she die?
4 A. She was murdered.
5 Q. And, and how was she murdered?
6 A. By her boyfriend's father.
7 Q. Did you know her boyfriend's father?
8 A. No.
9 Q. Was she shot?
10 A. Yes.
11 Q. Was -- were you close to her?
12 A. I was close enough.
13 Q. How long had you known her?
14 A. Only for two years.
15 Q. Would it be a fair statement to say that that
16 was a traumatic event to you?
17 A. Yeah.
18 Q. It still upsets you today?
19 A. Yes.
20 Q. Do you know why it upsets you it so much
21 today? Was it because you were particularly close to
22 her?
23 A. Well, the fact that I forced her to go to
24 Jeffrey's so much. And I didn't realize that after the
25 fact I brought her to Jeffrey's house, she got involved

1 with another child molester and that's who killed her.

2 Q. The -- that is the boyfriend's father you said
3 was a child molester?

4 A. Yes.

5 Q. And other than you say that the boyfriend's
6 father was a child molester, did he have any interaction
7 with her before the murder that you know of?

8 A. Before the murder?

9 Q. Right. I mean you say she shot her, but prior
10 to that did he have any interaction with her --

11 A. Yes.

12 Q. -- that you were aware of?

13 A. Yes.

14 Q. What interaction did he have with her that you
15 were aware of?

16 A. I wasn't aware of it at the time but after the
17 fact that she died, I was aware that he was touching her
18 and giving her drugs to have sexual intercourse with
19 her.

20 Q. And how did you find that out?

21 A. Through -- I went to the funeral and through
22 family.

23 Q. You, you only know that by what other people
24 told you?

25 A. Through the family, through very close

1 friends, through the newspaper, through -- sure, that's
2 what --

3 Q. So, you only know by what other people told
4 you about?

5 A. Well, my son's Godmother was very, very close
6 to her, and told me pretty much exactly what went on
7 after the fact that she died.

8 Q. Did you take her to Jeffrey Epstein?

9 A. Yes.

10 Q. How many times?

11 A. I think like three or four.

12 Q. And you told her the same thing you told the
13 other girls?

14 A. Yes.

15 Q. And what did she tell you after she went
16 there?

17 A. She didn't like it either.

18 Q. What specifically did she tell you?

19 A. She didn't like it at all.

20 Q. So why did you --

21 A. She didn't feel comfortable.

22 Q. So why did you take her back?

23 A. Because I was a naive, stupid little girl
24 brainwashed by a 50-year-old man.

25 Q. Was she using drugs before she went to see

1 him?

2 A. No.

3 Q. How do you know she wasn't?

4 A. Because she didn't do drugs.

5 Q. How well did you know her?

6 A. I knew her for two years, and she didn't do
7 any drugs. When I would take drugs to go to Jeffrey's
8 house, she didn't want anything.

9 Q. When you met with the FBI, did they discuss
10 with you your possible prosecution for any crimes?

11 A. Not that I recall.

12 Q. Were you represented by a lawyer other than
13 Mr. Eisenberg with respect to any dealings with the FBI?

14 MR. EDWARDS: Object to the form. Answer if
15 you know.

16 THE WITNESS: Not that I recall. I don't know
17 about all this lawyer stuff and whatever.

18 BY MR. LUTTIER:

19 Q. Have you ever been through any sort of drug or
20 alcohol rehab?

21 A. Rehab, no. I have never been to a rehab.

22 [REDACTED]
23 [REDACTED]

24 MR. EDWARDS: I am going to object and ask the
25 witness not to answer. Read.

1 THE WITNESS: On advice of counsel, I invoke
2 my Fifth Amendment rights under the United States
3 Constitution.

4 BY MR. LUTTIER:

5 Q. In your interrogatories there, is there a
6 question that asked you where you've worked? Let's take
7 a look at interrogatory number -- let's look at
8 Interrogatory No. 2. And let's mark it as Exhibit 2.

9 (Defendant's Exhibit No. 2 was marked for
10 identification.)

11 BY MR. LUTTIER:

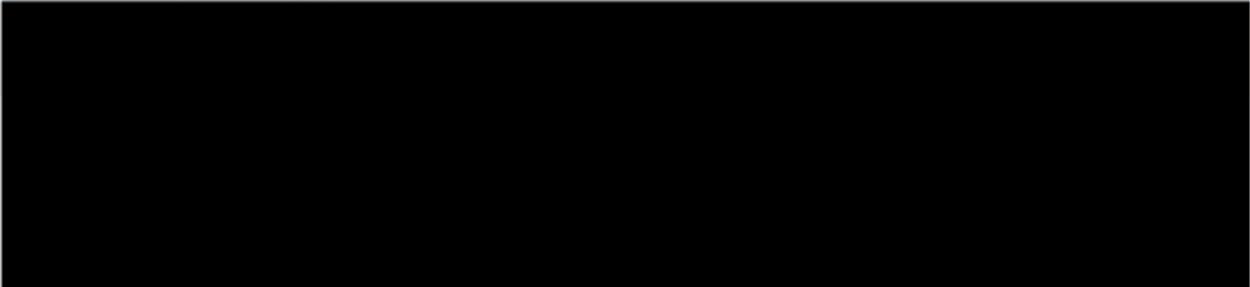
12 Q. Do you see Interrogatory 2 there in the
13 interrogatories that are in front of you that are marked
14 as Exhibit 1?

15 A. Yes.

16 Q. It asks you to list there all the business
17 addresses where you have worked for the last 10 years,
18 correct?

19 A. Yes.

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2 BY MR. LUTTIER:

3 Q. But on this answer to Interrogatory 2, there
4 is no invoking the Fifth Amendment. So, are you telling
5 me that the answers that you provided have been marked
6 as Exhibit 1 are not true and correct?

7 MR. EDWARDS: She's not answering the
8 question. You can read it over and over and over
9 again if you want. If you want to have this
10 discussion, you can argue waiver, you can argue
11 whatever you need to to get this answered, about
12 she's not going to answer the question today.

13 BY MR. LUTTIER:

14 Q. Let me show you what's been marked as Exhibit
15 2, which are your, what are known as better answers to
16 interrogatories, and I have shown your counsel. And
17 have you seen these answers before, Exhibit 2? You're
18 looking at Exhibit 1. Exhibit 2 is right there.

19 A. Yeah, I have looked at them before.

20 Q. Did you review them before they were filed?

21 A. Yes.

22 Q. And were they true and correct?

23 A. Yes.

24 MR. LUTTIER: I notice that this particular
25 set that I have, maybe counsel can address this,

1 are not signed but it was represented to us that
2 these are the answers to interrogatories; is that
3 correct?

4 MR. EDWARDS: They are her answers to
5 interrogatories. I think it's a very well-known
6 fact that attorney, counsel help to fill out
7 interrogatories for their clients, and this was
8 done over a telephone and she has not had a chance
9 to sign them.

10 BY MR. LUTTIER:

11 Q. But, but these are -- you're adopting these as
12 being your true and correct answers to interrogatories;
13 is that right, ma'am?

14 A. As of right now, yeah, I don't want to -- I
15 don't want to answer. I don't want to sign this.

16 Q. Why not?

17 A. On advice of counsel, I invoke my Fifth
18 Amendment rights under the United States Constitution.

19 Q. Okay. Well, at any rate you said you reviewed
20 these before they were out. Let's look at Interrogatory
21 No. 2.

22 A. Sir, I'm sorry. I thought this was the same
23 one as this. I have never reviewed this. Like he said,
24 it was done over the phone and I --

25 Q. Let's look at answer to Interrogatory No. 2.

1 I mean, your lawyer would have no way to come up with
2 this information other than getting it from you, right?

3 A. Correct.

4 Q. His answer -- look at your answer to
5 Interrogatory 2, read the question and tell me whether
6 or not it's true and correct.

7 A. Can I read this again? On advise of counsel,
8 I invoke my Fifth Amendment rights under the United
9 States Constitution.

10 Q. And my question is whether or not the answers
11 you gave already are true and correct.

12 A. I don't want to answer this question.

13 MR. EDWARDS: She's invoking as to that
14 question that you're asking right now as to whether
15 this is true and correct.

16 BY MR. LUTTIER:

17 Q. Would you please me every place you have
18 worked in the last 10 years.

19 A. On advice of counsel, I invoke my Fifth
20 Amendment rights under the United States Constitution.

21 [REDACTED]
22 [REDACTED]
23 [REDACTED]

24 A. On advice of counsel, I invoke my Fifth
25 Amendment rights under the United States Constitution.

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[REDACTED]

A. On advice of counsel, I invoke my Fifth Amendment rights under the United States Constitution.

[REDACTED]

A. On advice of counsel, I invoke my Fifth Amendment rights under the United States Constitution.

[REDACTED]

A. On advice of counsel, I invoke my Fifth Amendment rights under the United States Constitution.

[REDACTED]

A. On advice of counsel, I invoke my Fifth Amendment rights under the United States Constitution.

[REDACTED]

A. On advice of counsel, I invoke my Fifth Amendment rights under the United States Constitution.

MR. EDWARDS: Make the objection as to third-party privacy rights as well.

1 BY MR. LUTTIER:

2

3

4 A. On advice of counsel, I invoke my Fifth
5 Amendment rights under the United States Constitution.

6 MR. EDWARDS: Same objection as to privacy
7 rights of third parties.

8 BY MR. LUTTIER:

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16 A. On advice of counsel, I invoke my Fifth
17 Amendment rights under the United States Constitution.

18 Q. How were you paid when you worked at Lauren's?

19 A. On advice of counsel, I invoke my Fifth
20 Amendment rights under the United States Constitution.

21

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24 A. On advice of counsel, I invoke my Fifth
25 Amendment rights under the United States Constitution.

1 Q. Are all federal income tax returns that you
2 have filed true and correct?

3 A. On advice of counsel, I invoke my Fifth
4 Amendment rights under the United States Constitution.

5 Q. In the year 2008, did you accurately disclose
6 on your federal income tax return all of the money you
7 had earned in the calendar year 2008?

8 A. On advice of counsel, I invoke my Fifth
9 Amendment rights under the United States Constitution.

10 Q. On your federal income tax return that you
11 filed for the calendar year 2007, did you disclose all
12 of the earned, the income that you earned in the
13 calendar year in 2007?

14 A. On advice of counsel, I invoke my Fifth
15 Amendment rights under the United States Constitution.

16 Q. On your 2008 tax returns did you accurately
17 reflect what your work was or your occupation?

18 A. Did I what?

19 Q. Accurately reflect your work or occupation on
20 your 2008 tax return?

21 A. On advice of counsel, I invoke my Fifth
22 Amendment rights under the United States Constitution.

23 Q. On your 2007 federal income tax return that
24 you filed with the federal government, did you
25 accurately reflect your work or occupation?

1 A. On advice of counsel, I invoke my Fifth
2 Amendment rights under the United States Constitution.

3 [REDACTED]
4 [REDACTED]

5 A. On advice of counsel, I invoke my Fifth
6 Amendment rights under the United States Constitution.

7 [REDACTED]
8 [REDACTED]
9 [REDACTED]

10 A. On advice of counsel, I invoke my Fifth
11 Amendment rights under the United States Constitution.

12 MR. EDWARDS: Just so that the record is
13 clear, also this issue we are considering to be
14 under review by the Fourth District Court of Appeal
15 and subject to the Rule to Show Cause Order and
16 implicating privacy rights of [REDACTED] as well as
17 third-party individuals as well as her Fifth
18 Amendment invocation.

19 MR. CRITTON: Let me just --

20 MR. EDWARDS: I will not continue to break up
21 this string every single time. I will let her
22 invoke and go on. But that's going to be an
23 additional objection to this line of questioning.

24 MR. CRITTON: Just because, Mark, Mr. Luttier
25 has not been as familiar with the record as much as

1 I have with regard to the only issue on appeal is,
2 deals with Question 19. That's the sole issue that
3 was raised by you on the Petition for Writ of Cert
4 both as to [REDACTED] and as both to [REDACTED]

5 No other issues have been raised. You are
6 under, you are under orders from Judge Hafele based
7 in large part on agreement --

8 MR. EDWARDS: Agreed.

9 MR. CRITTON: -- to answer these questions and
10 to have answered these questions. I assumed that
11 the, the unverified were true and accurate and that
12 you as a lawyer and as an officer of the court
13 would not have provided those unless those were
14 true and accurate and would have corrected them
15 before now.

16 I understand you're asserting the Fifth today,
17 but we, we have relied upon your good faith,
18 certainly your professionalism that you have
19 expressed thus far in this case, Brad, and based
20 upon the court orders which your client is under
21 which apparently now your client, or you're taking
22 the position of Fifth Amendment.

23 MR. EDWARDS: Agreed.

24 MR. CRITTON: Okay.

25

1 BY MR. LUTTIER:

2 Q. [REDACTED]

3 A. On advice of counsel, I invoke my Fifth
4 Amendment rights under the United States Constitution.

5 [REDACTED]

6 A. Do we have a recorder? On advice of counsel,
7 I invoke my Fifth Amendment rights under the United
8 States Constitution.

9 [REDACTED]

10 [REDACTED]

11 A. On advice of counsel, I invoke my Fifth
12 Amendment rights under the United States Constitution.

13 Q. Did someone send you there?

14 A. On advice of counsel, I invoke my Fifth
15 Amendment rights under the United States Constitution.

16 Q. Have you ever been a sole proprietor, owned
17 your own business?

18 A. Yes.

19 Q. What business did you own?

20 A. On advice of counsel, I invoke my Fifth
21 Amendment rights under the United States Constitution.

22 MR. EDWARDS: I think I may be able to get you
23 an answer to that question. Can I confer with my
24 client for a second?

25 MR. LUTTIER: Sure.

1 THE WITNESS: And I want to talk to you
2 outside for a second.

3 (A brief recess was held.)

4 MR. EDWARDS: Previous question about her own
5 employment?

6 MR. LUTTIER: I will just have her read it
7 back.

8 (The requested portion of the record was read
9 by the reporter.)

10 [REDACTED]

11
12 BY MR. LUTTIER:

13 Q. What was the name of the -- did you have a
14 name of a business?

15 A. No.

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 BY MR. LUTTIER:

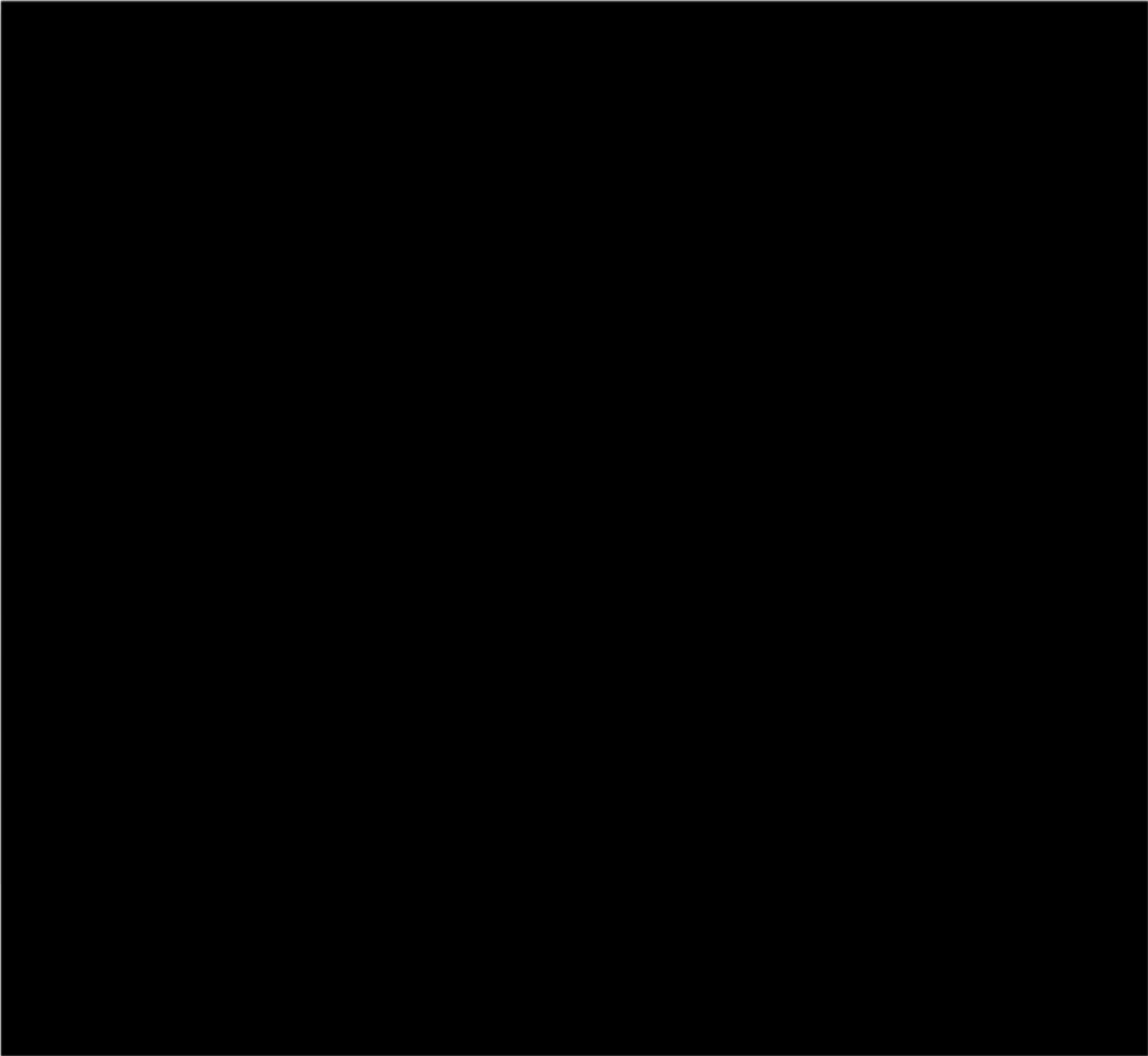
2 Q. Before you went to see him for the first time,
3 were you call girl?

4 A. No.

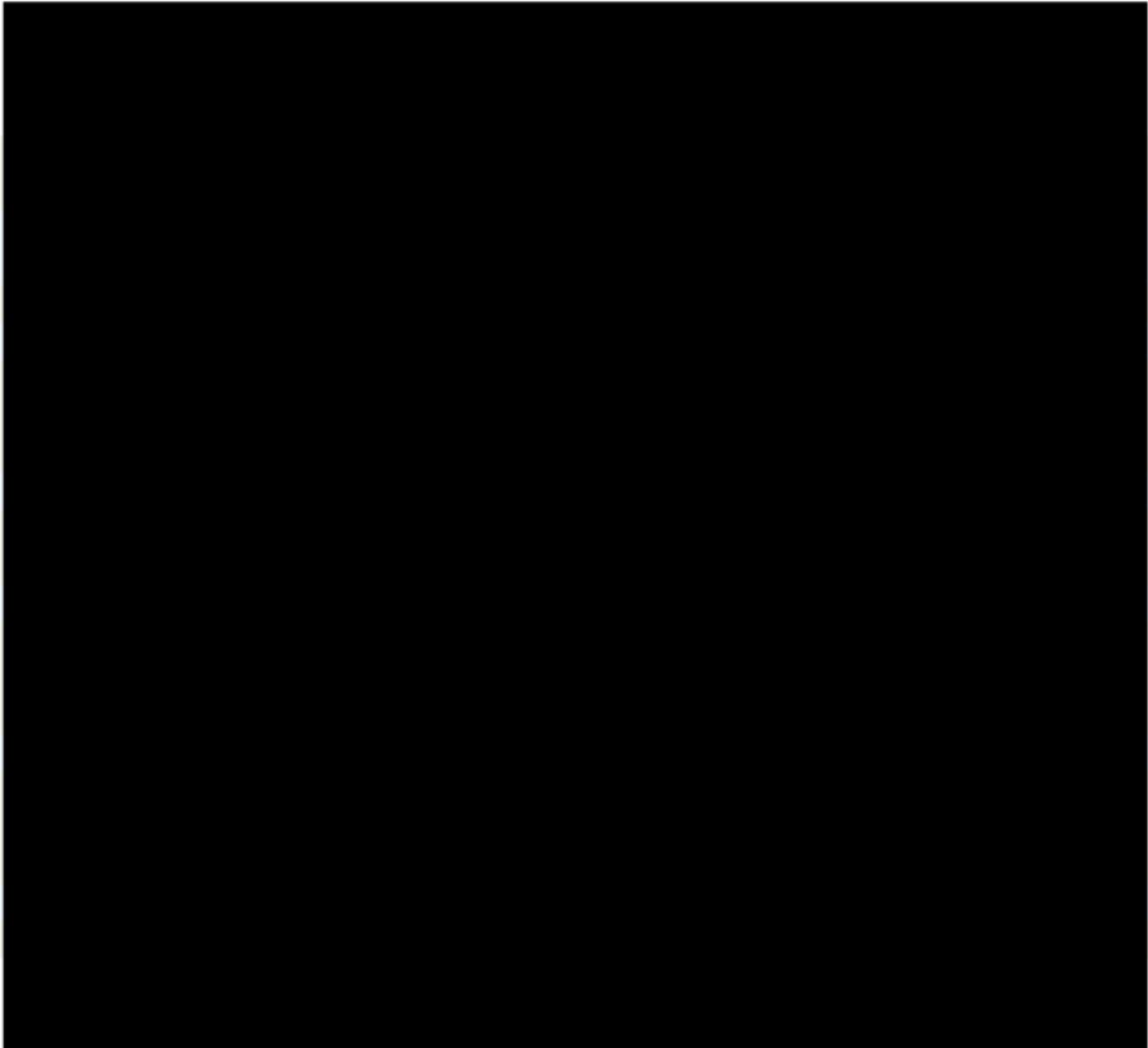
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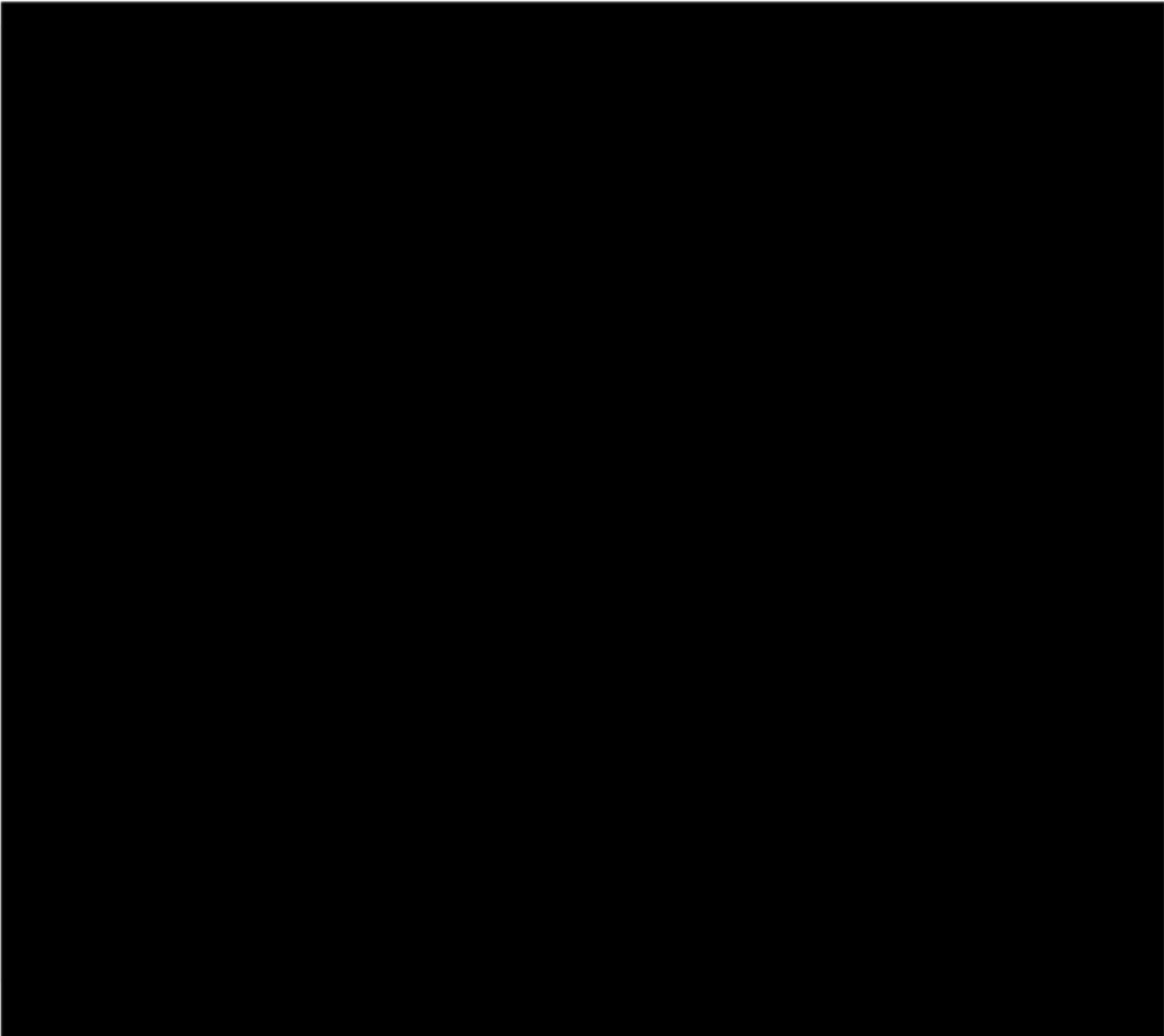


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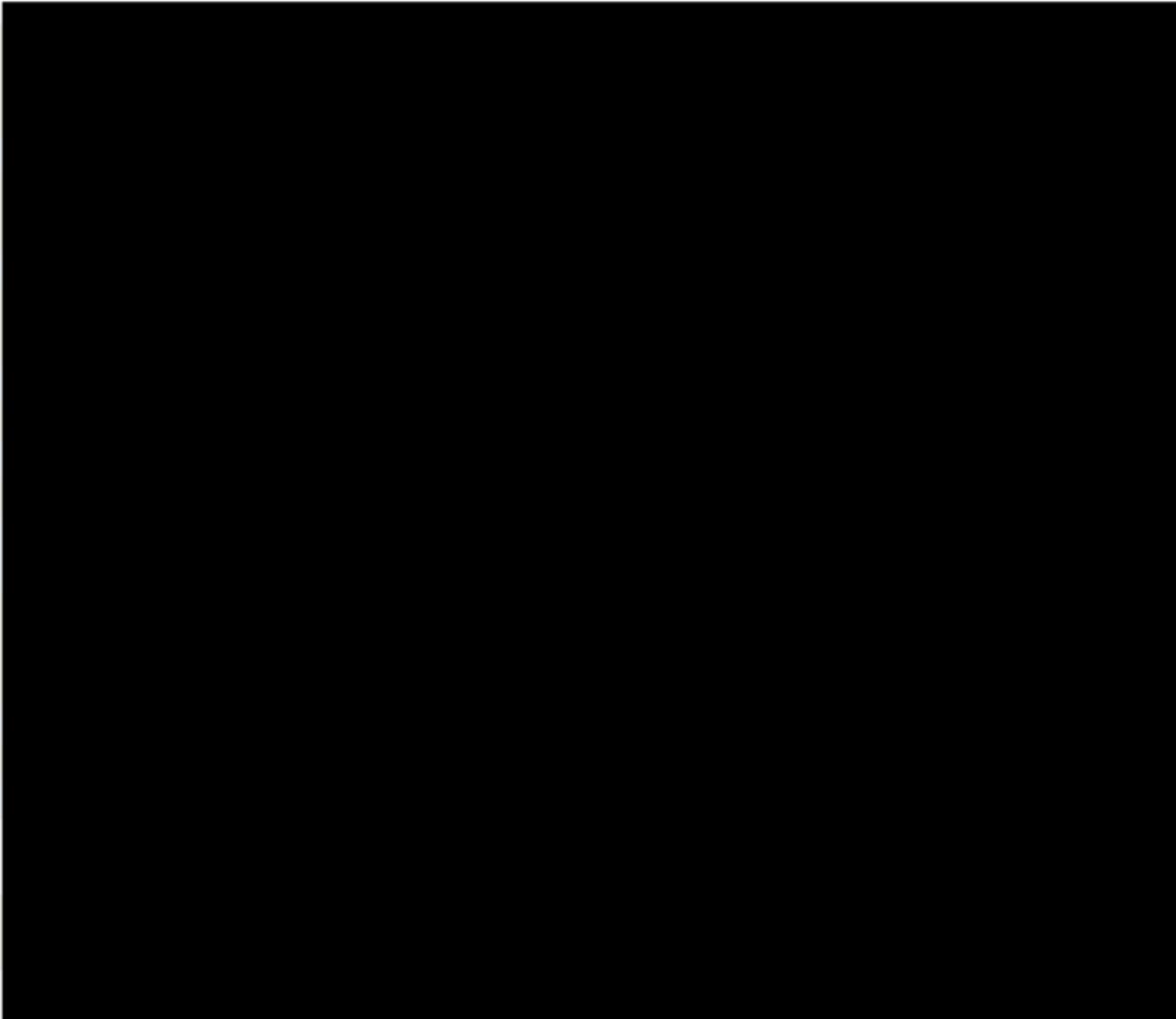


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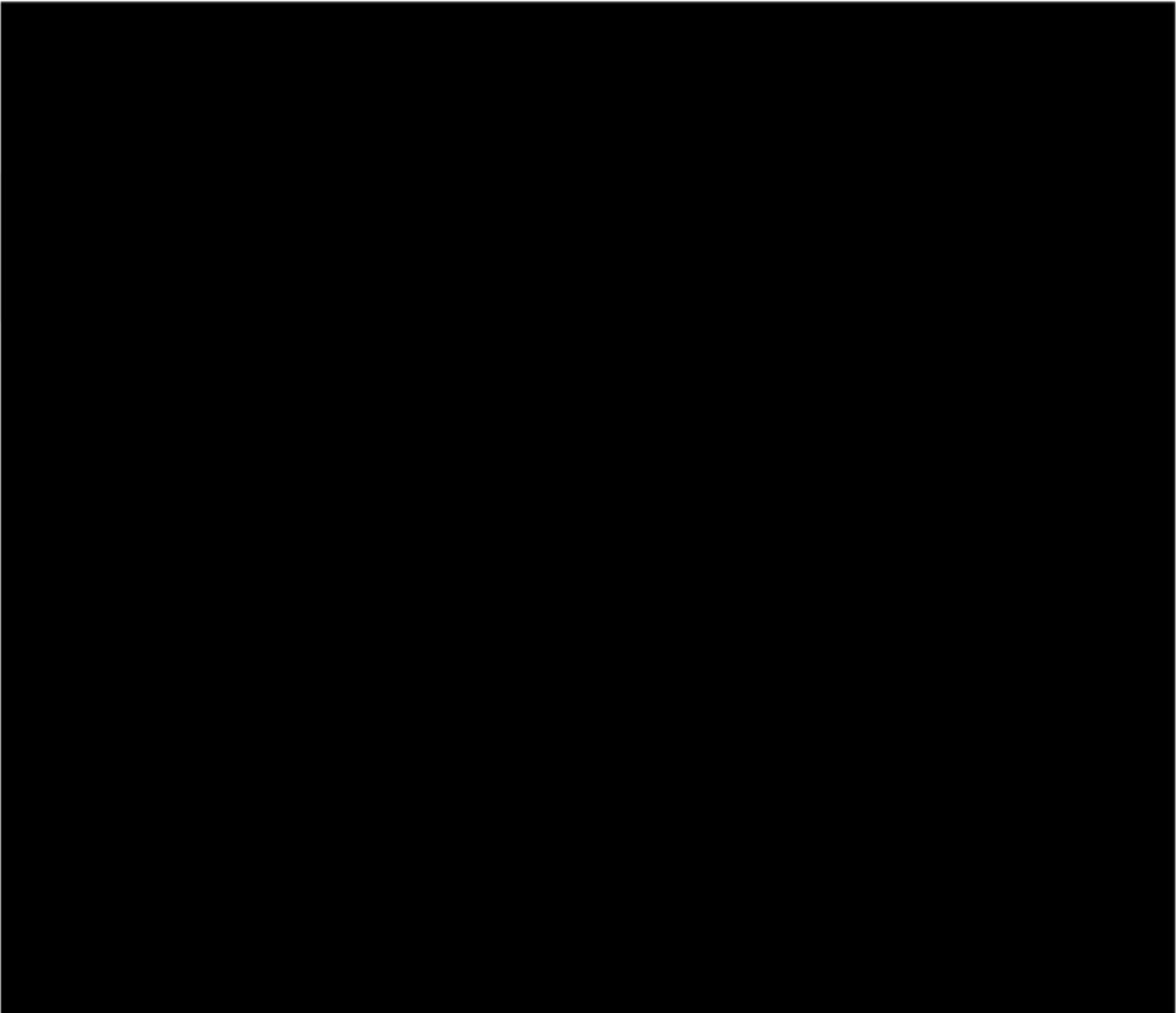
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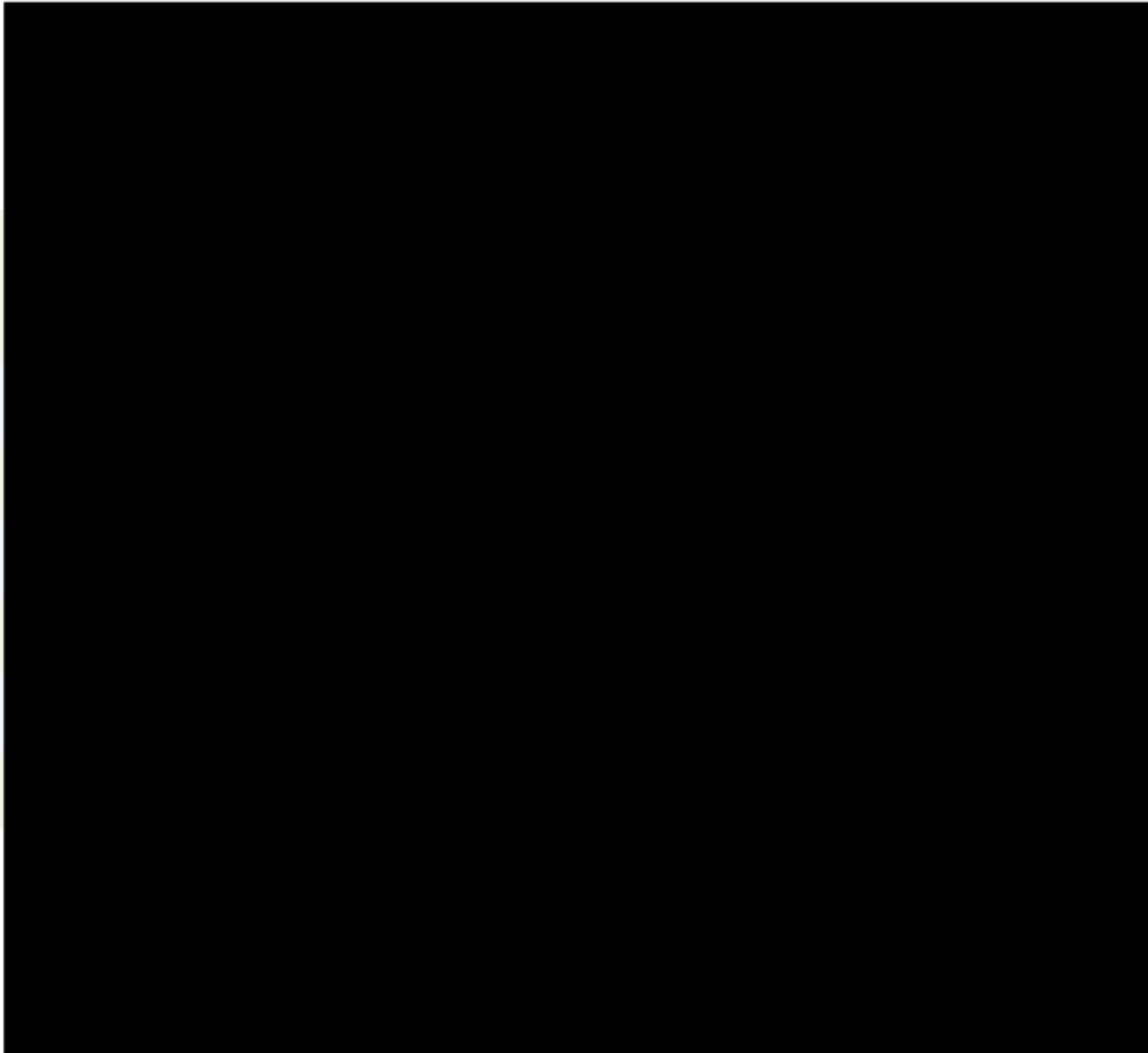
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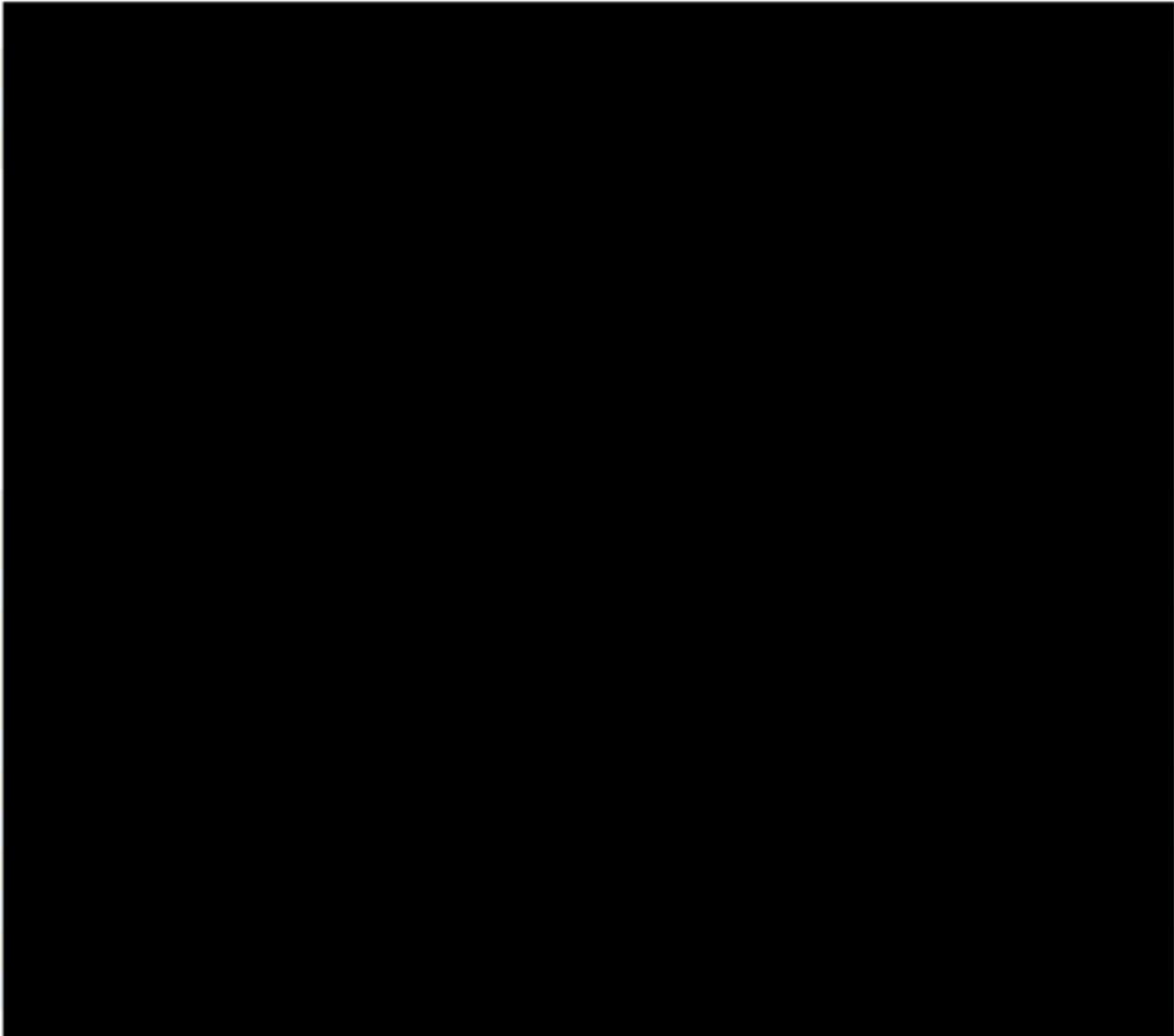
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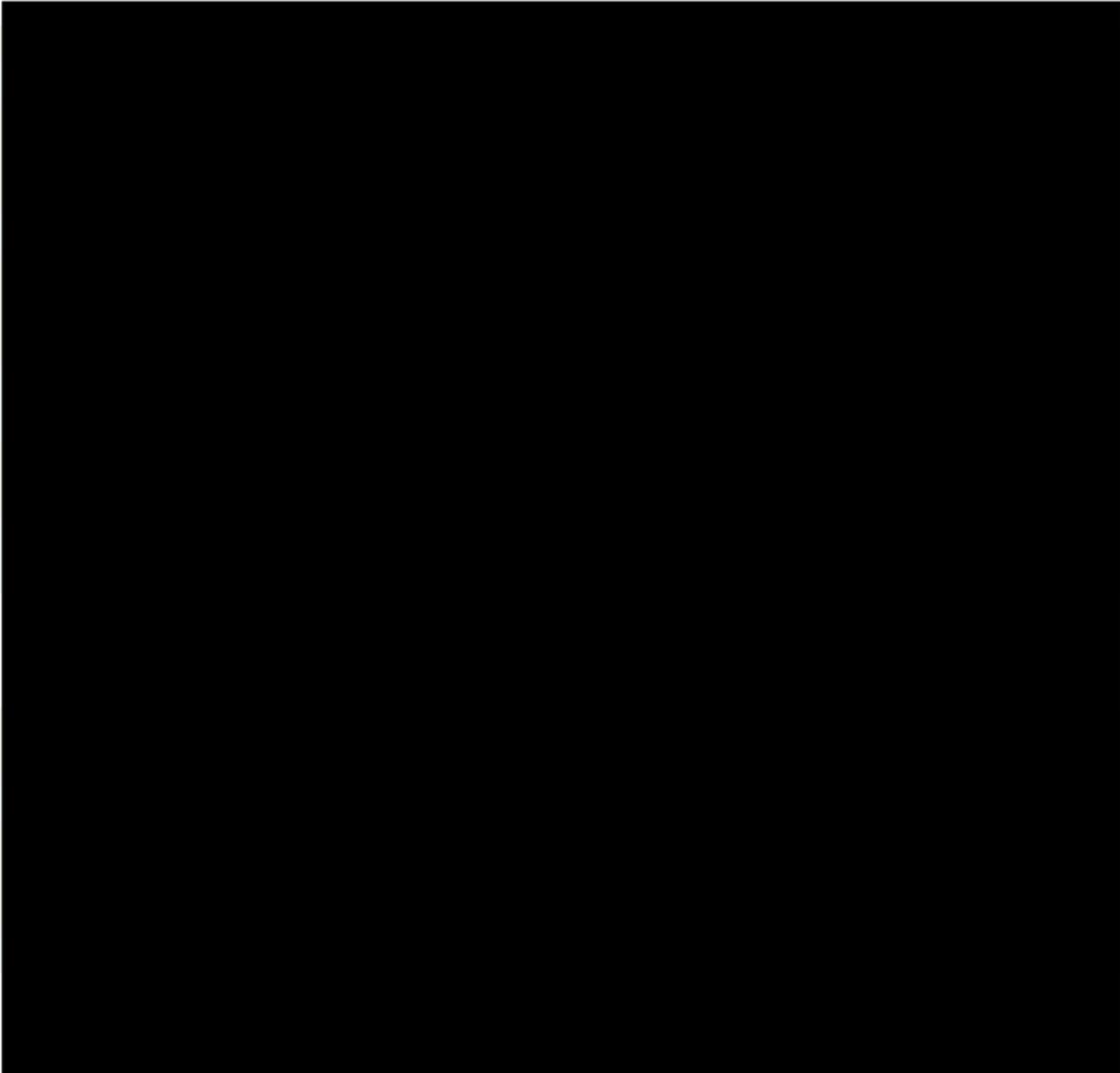
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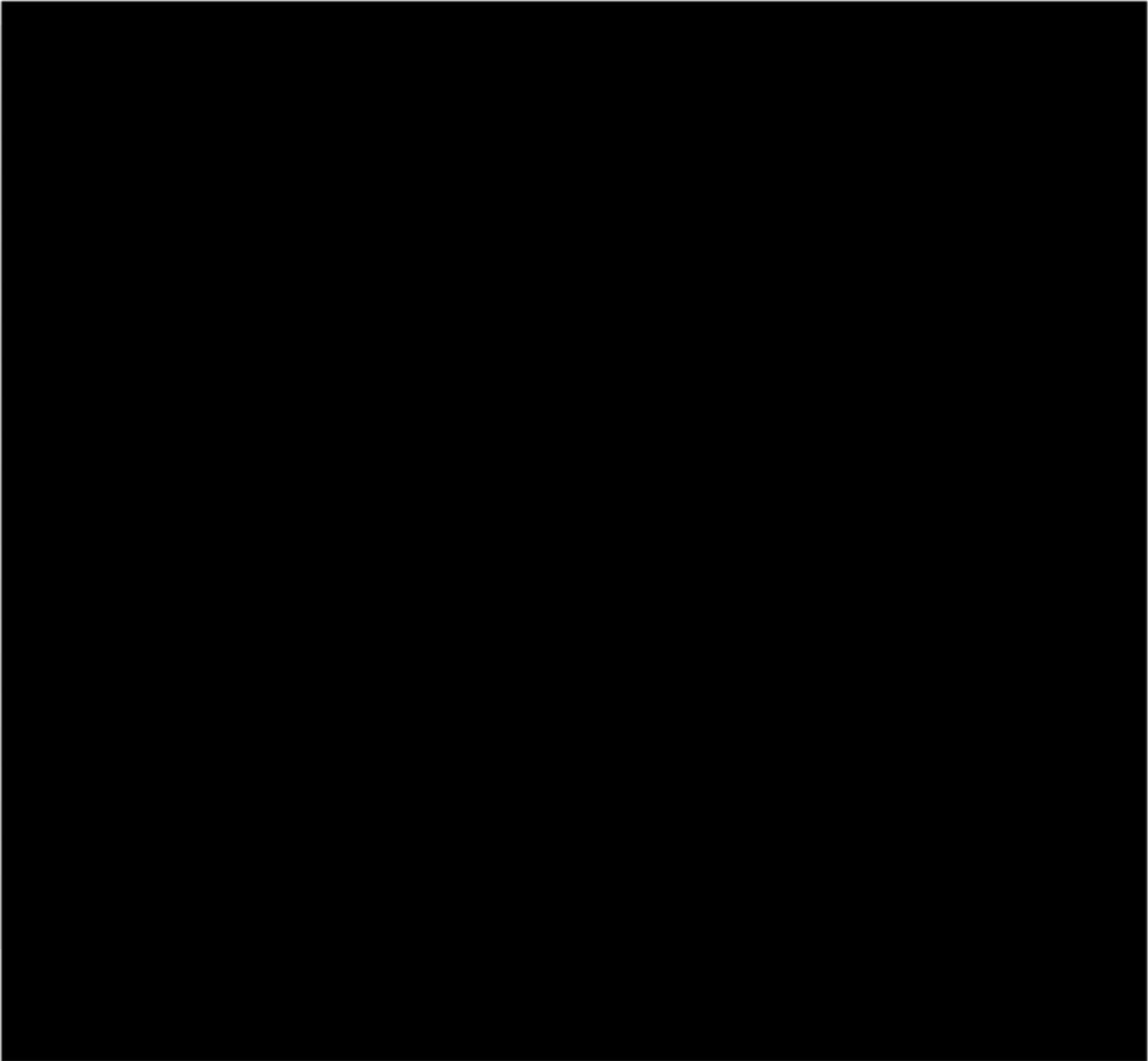


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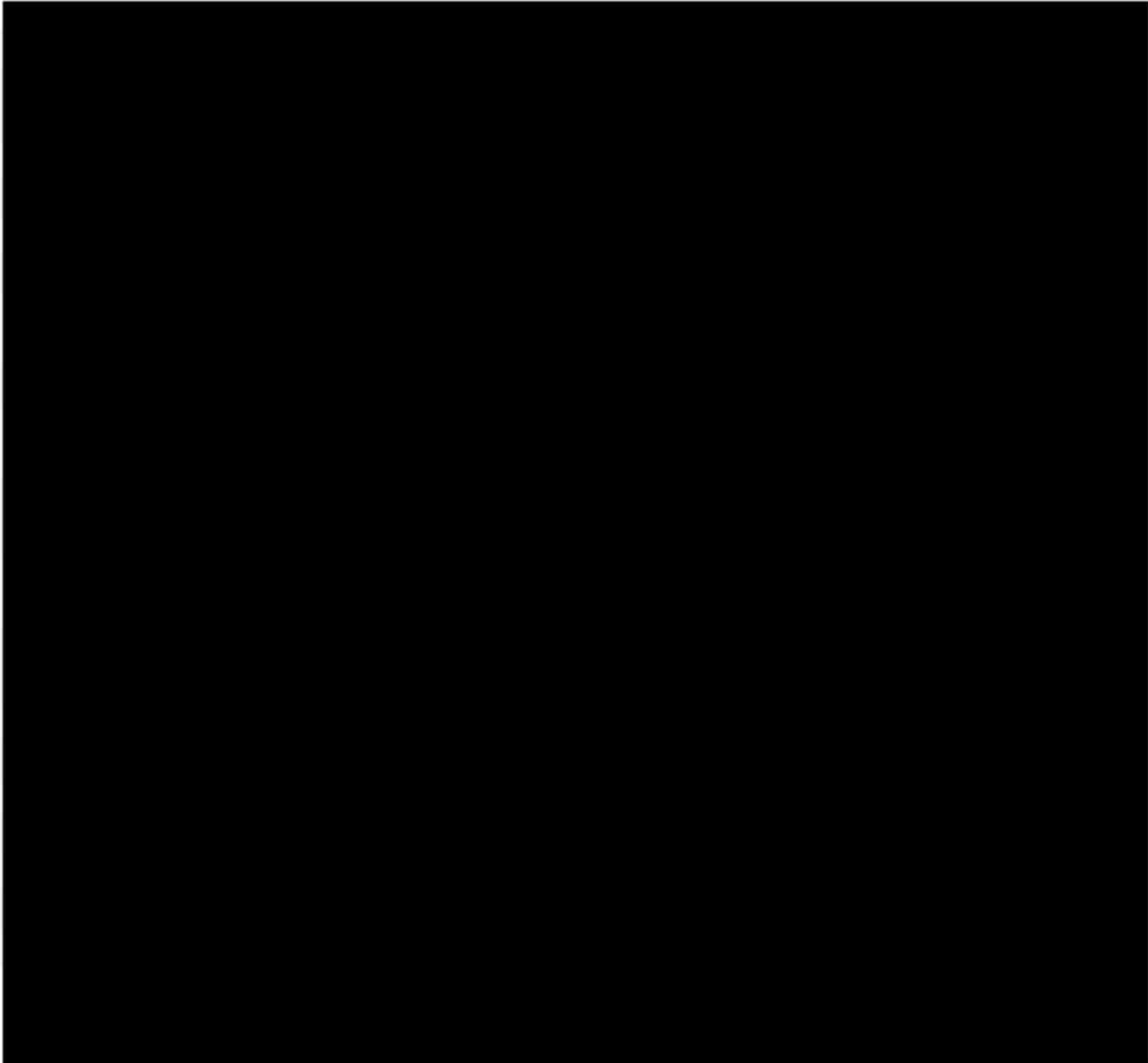


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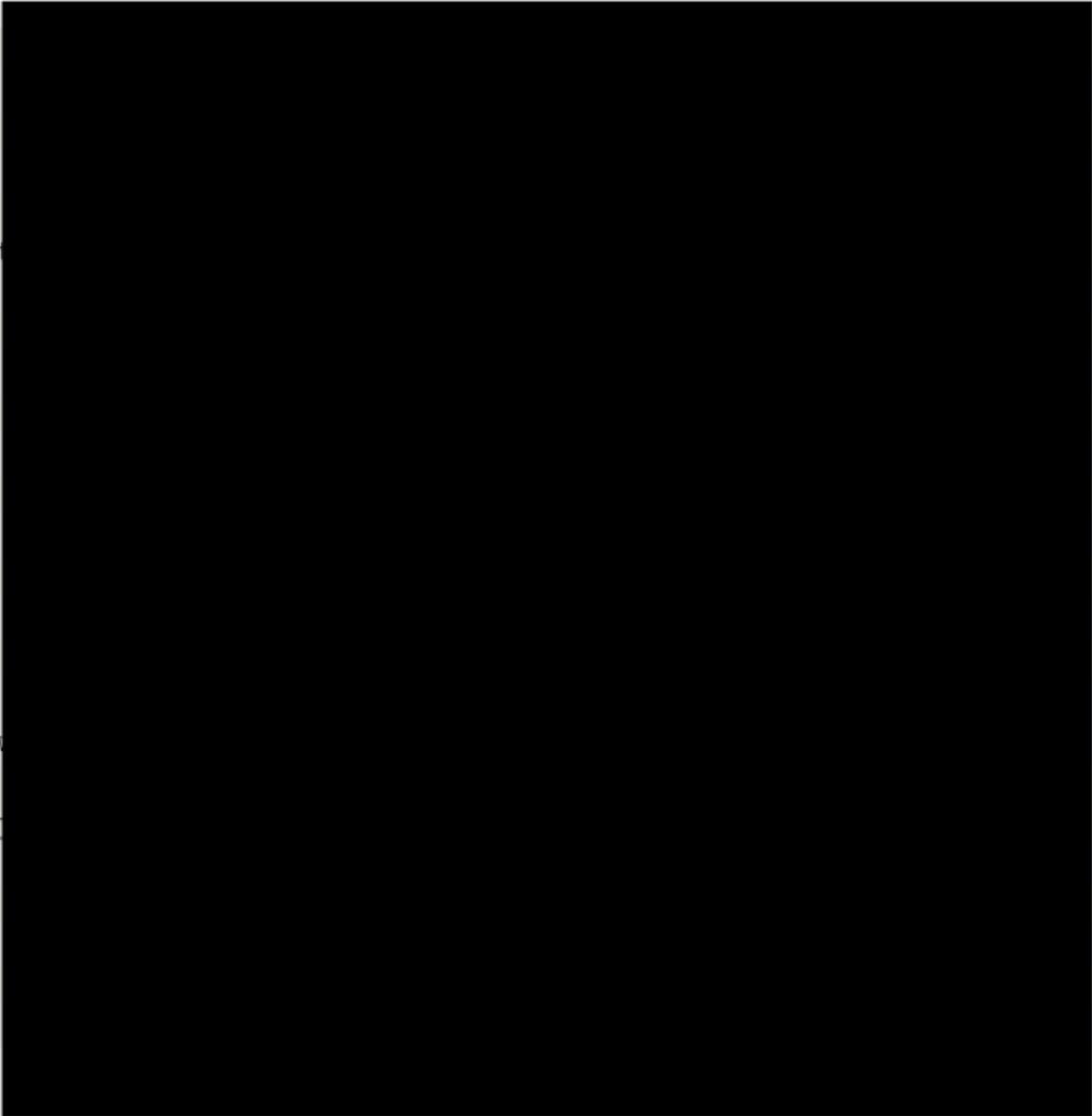
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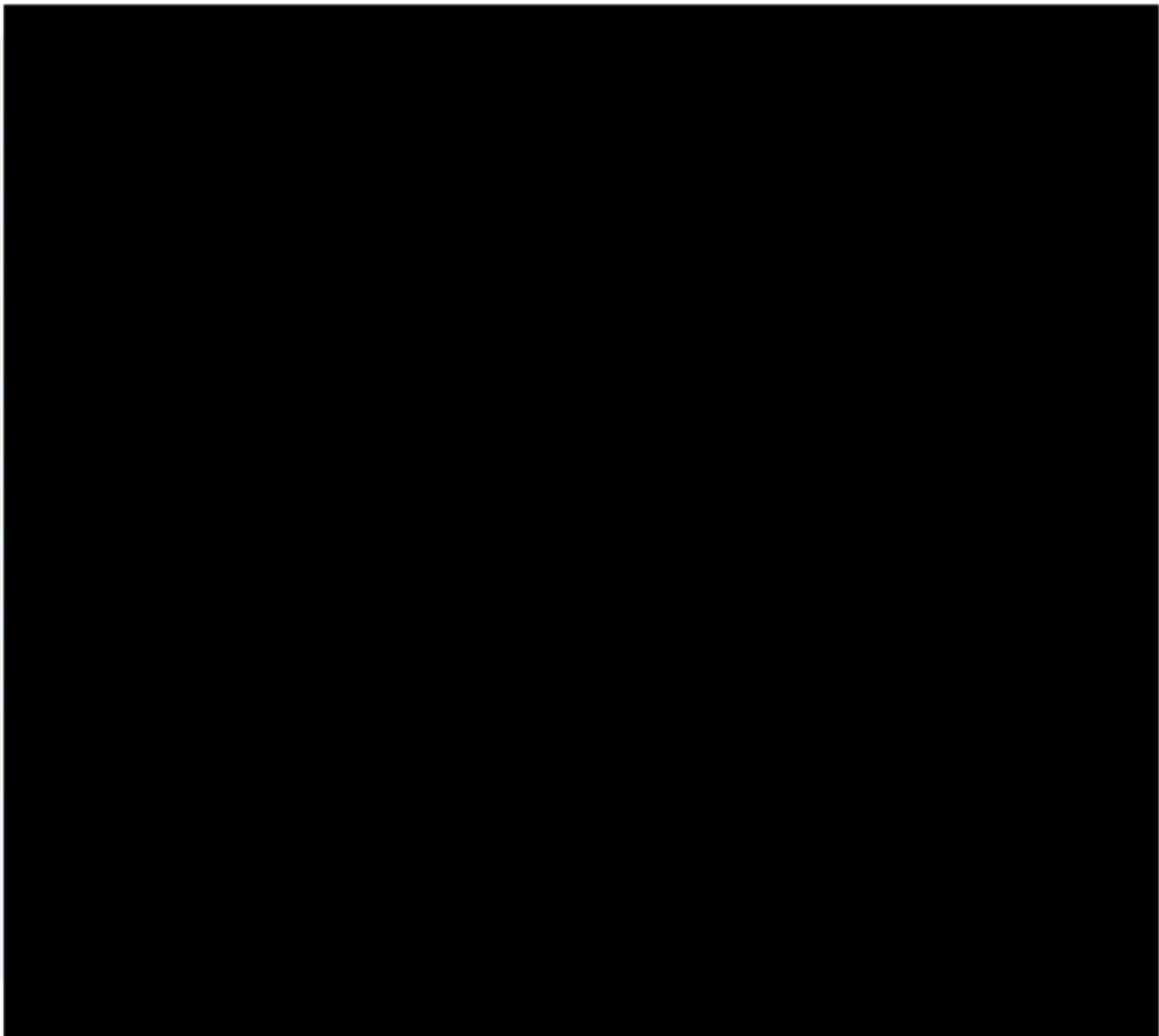
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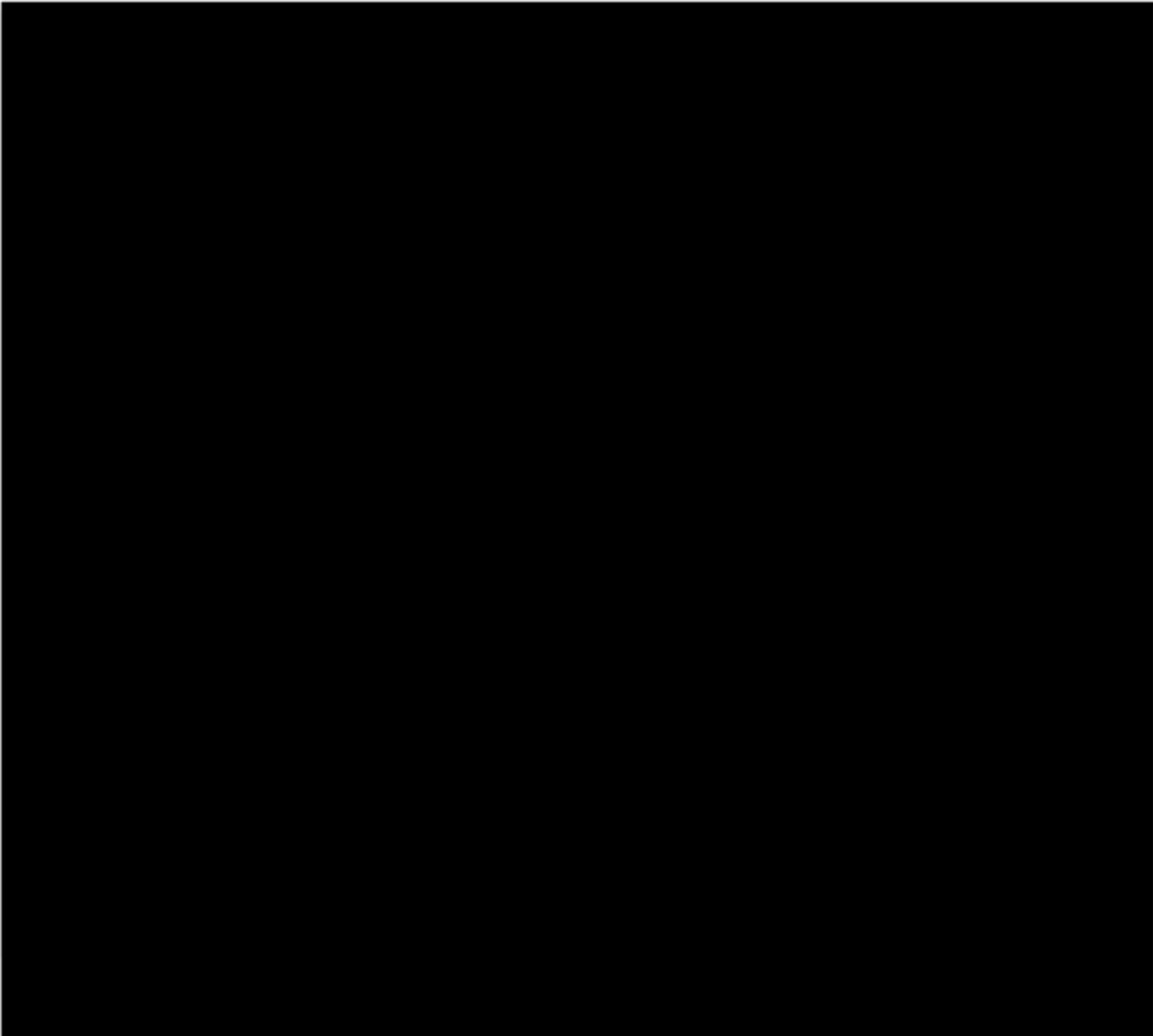
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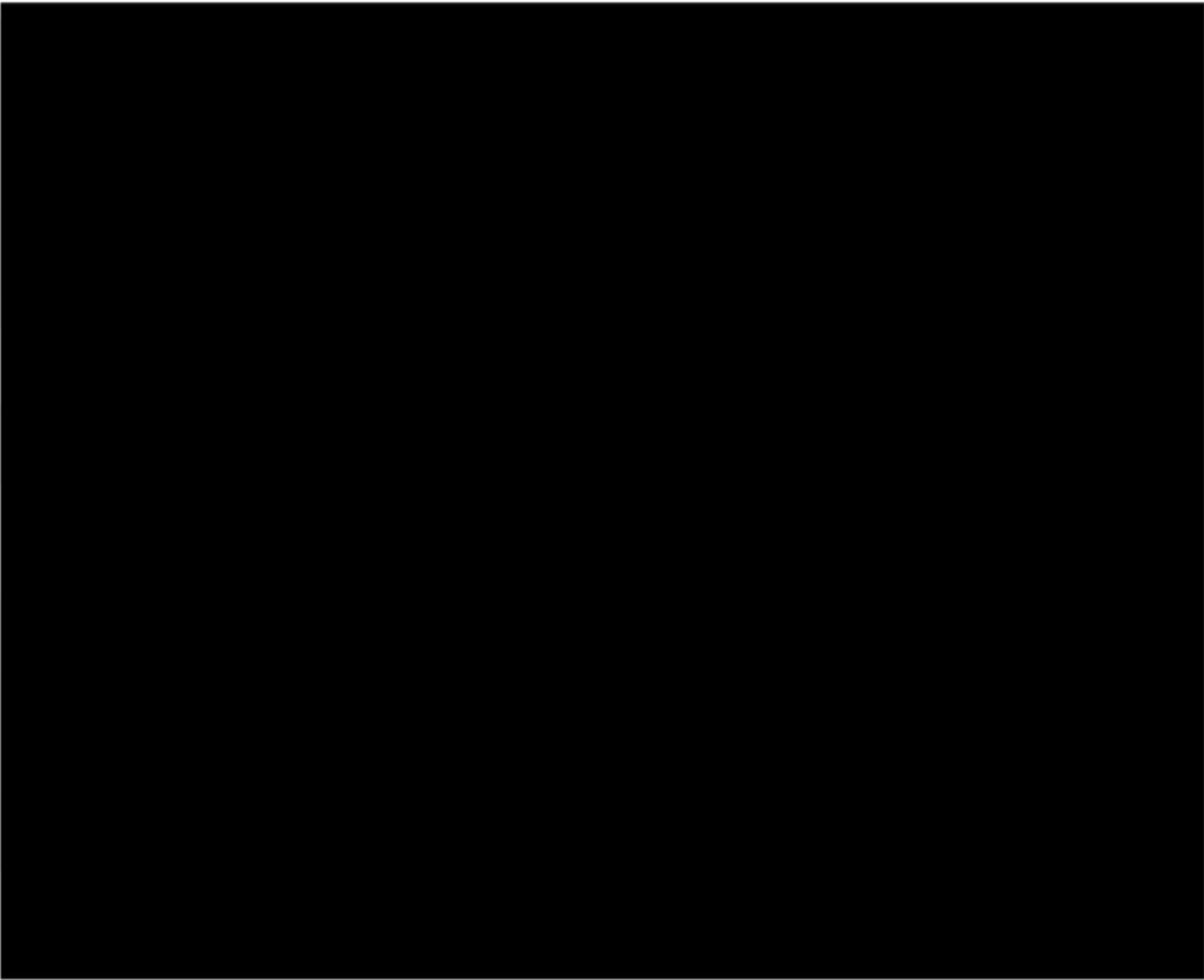
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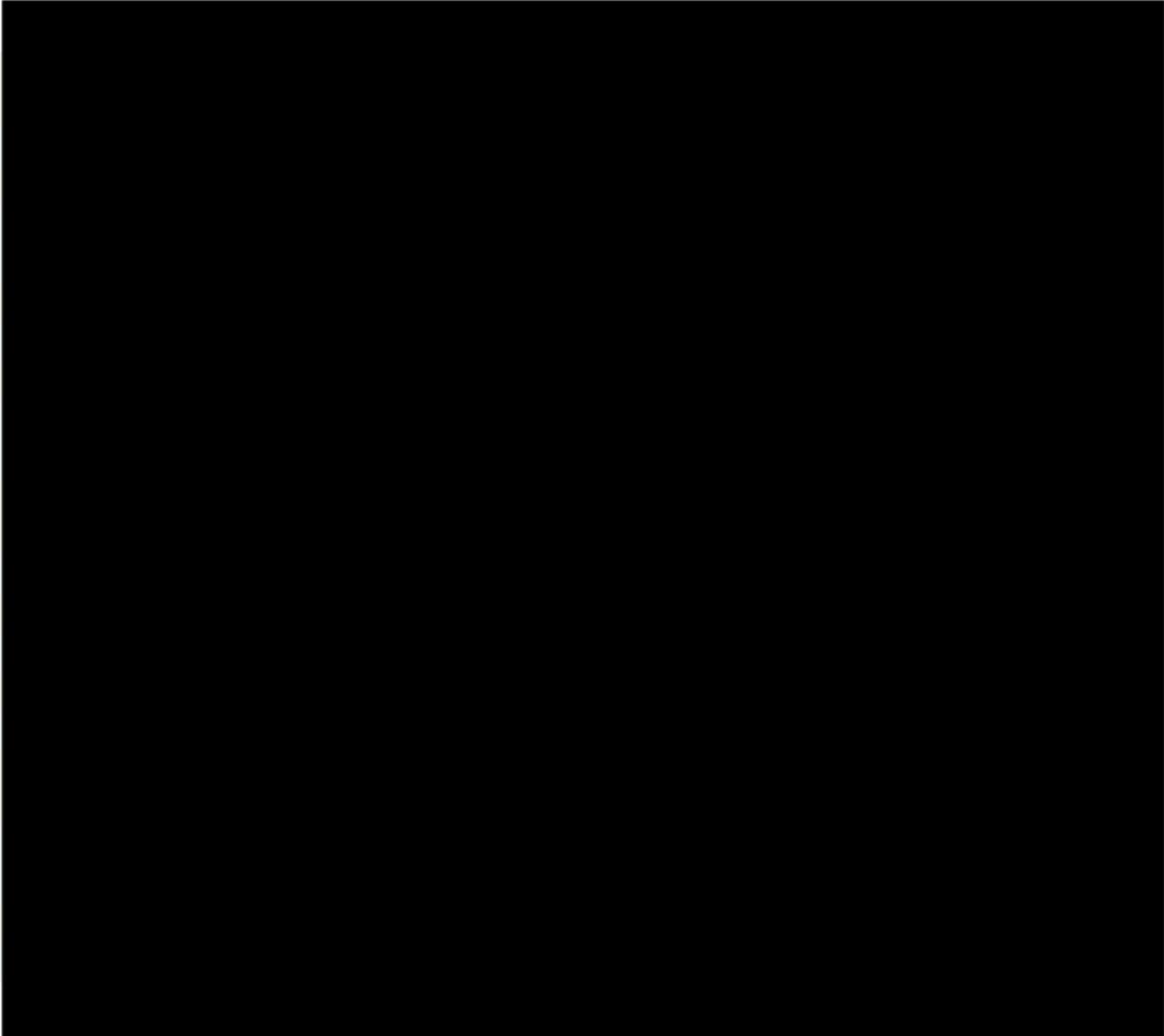
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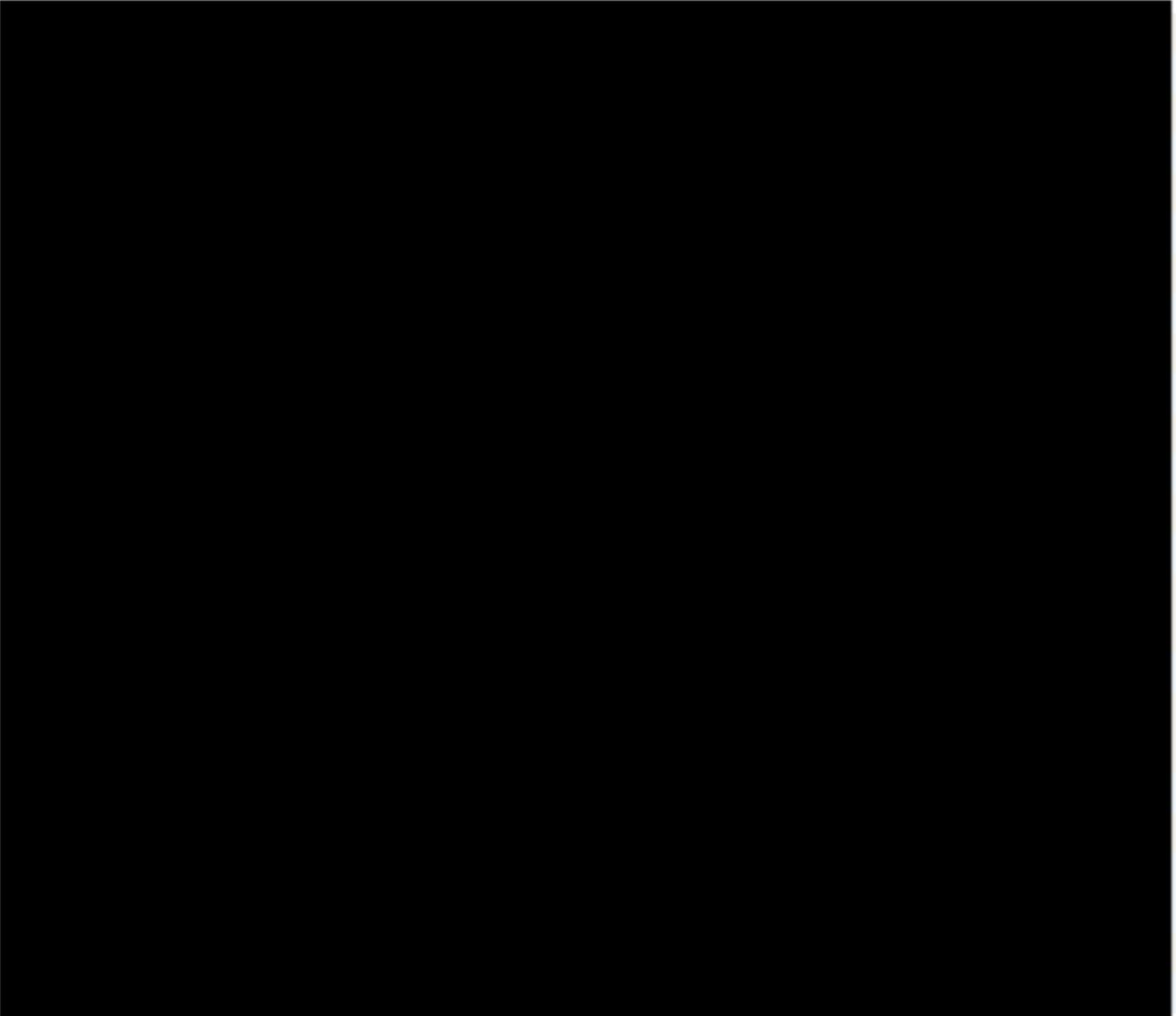
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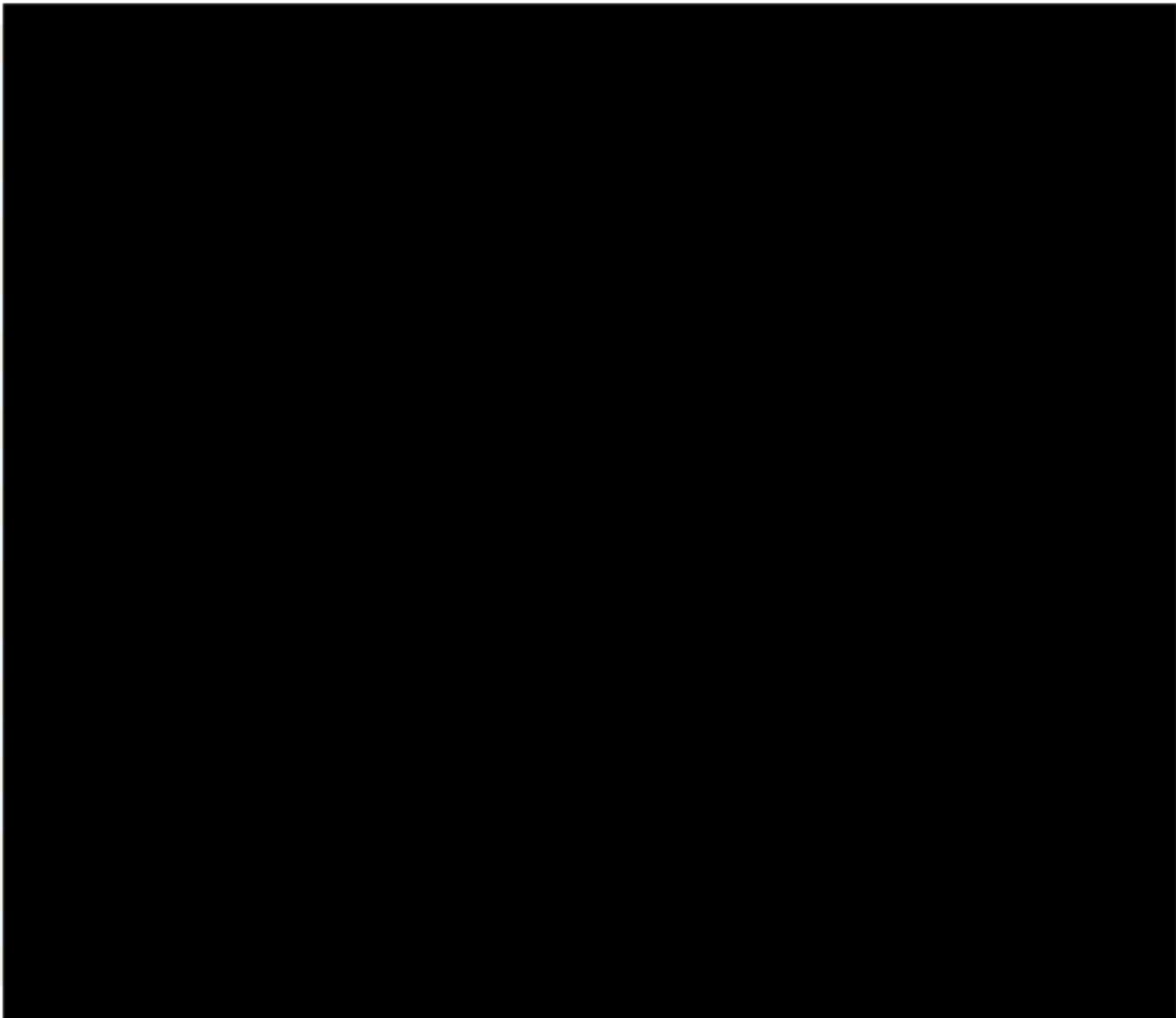
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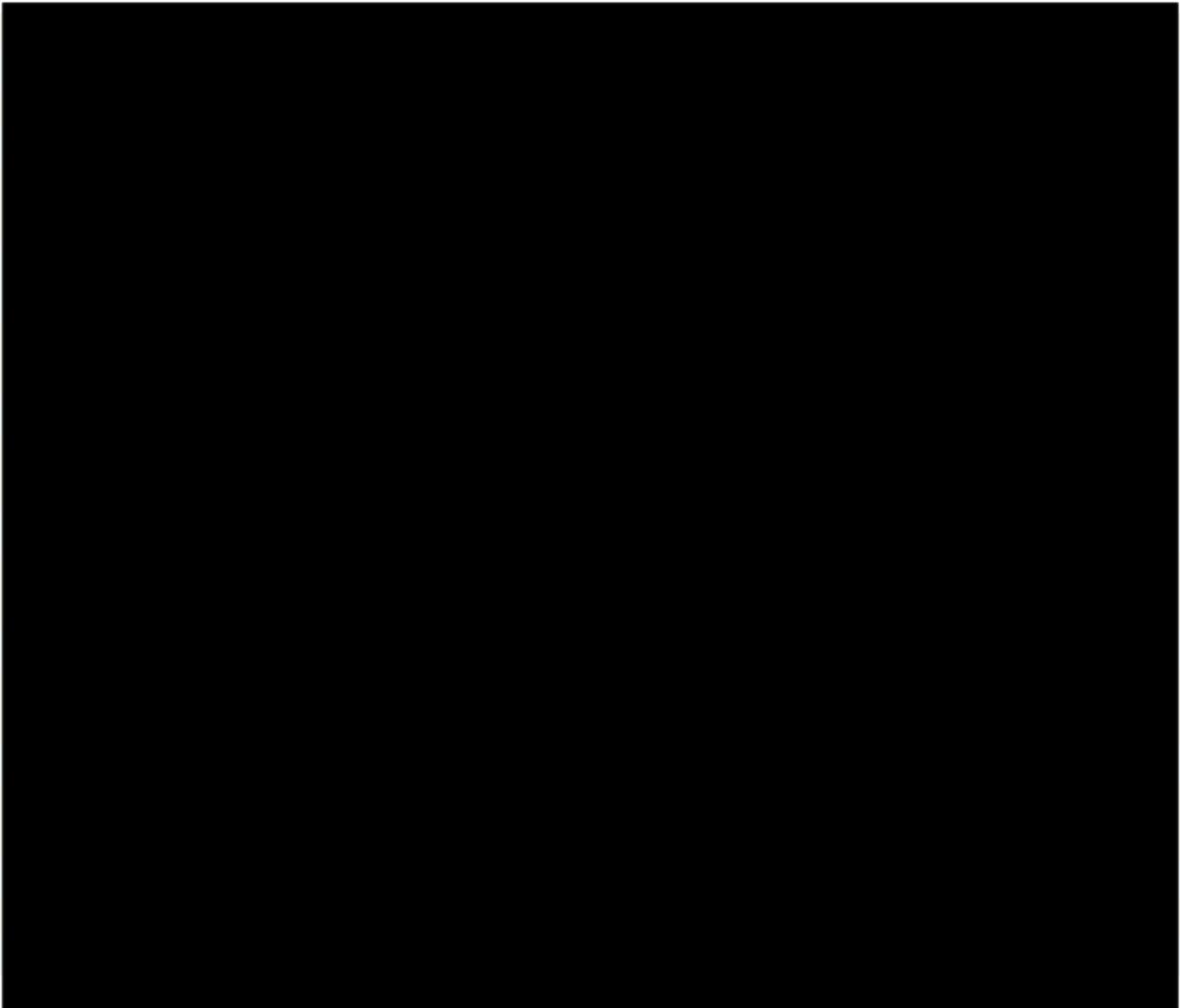
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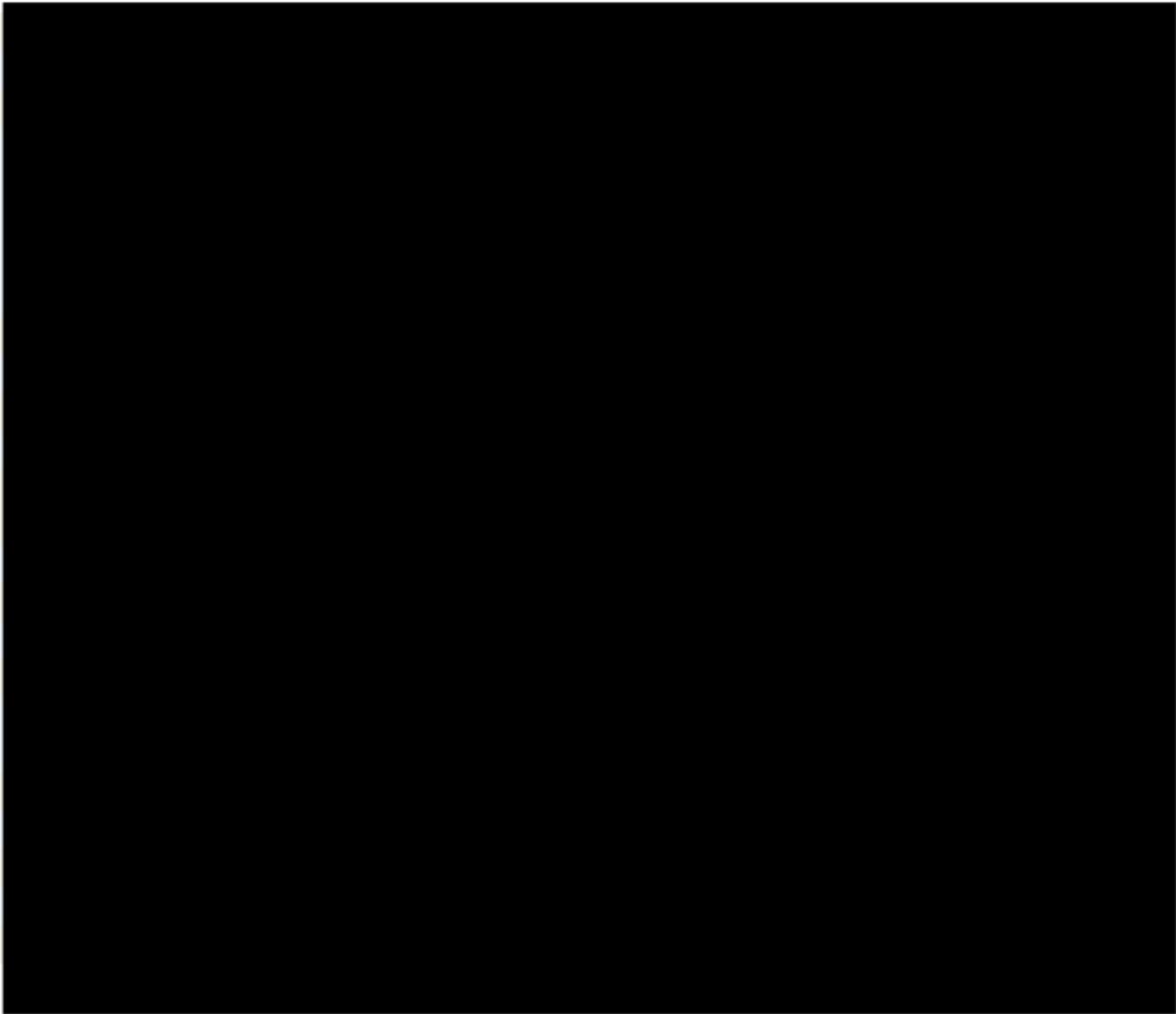


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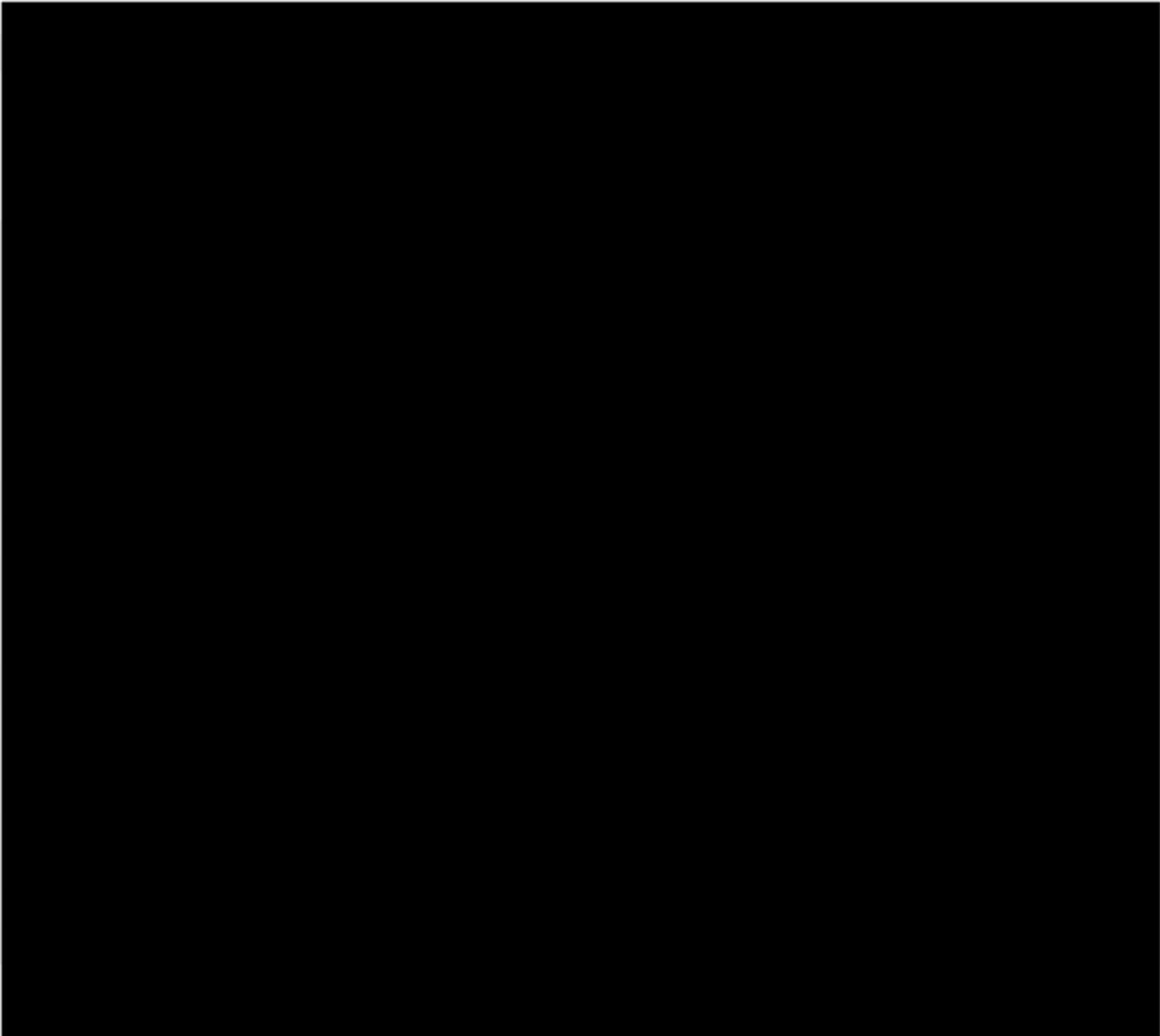
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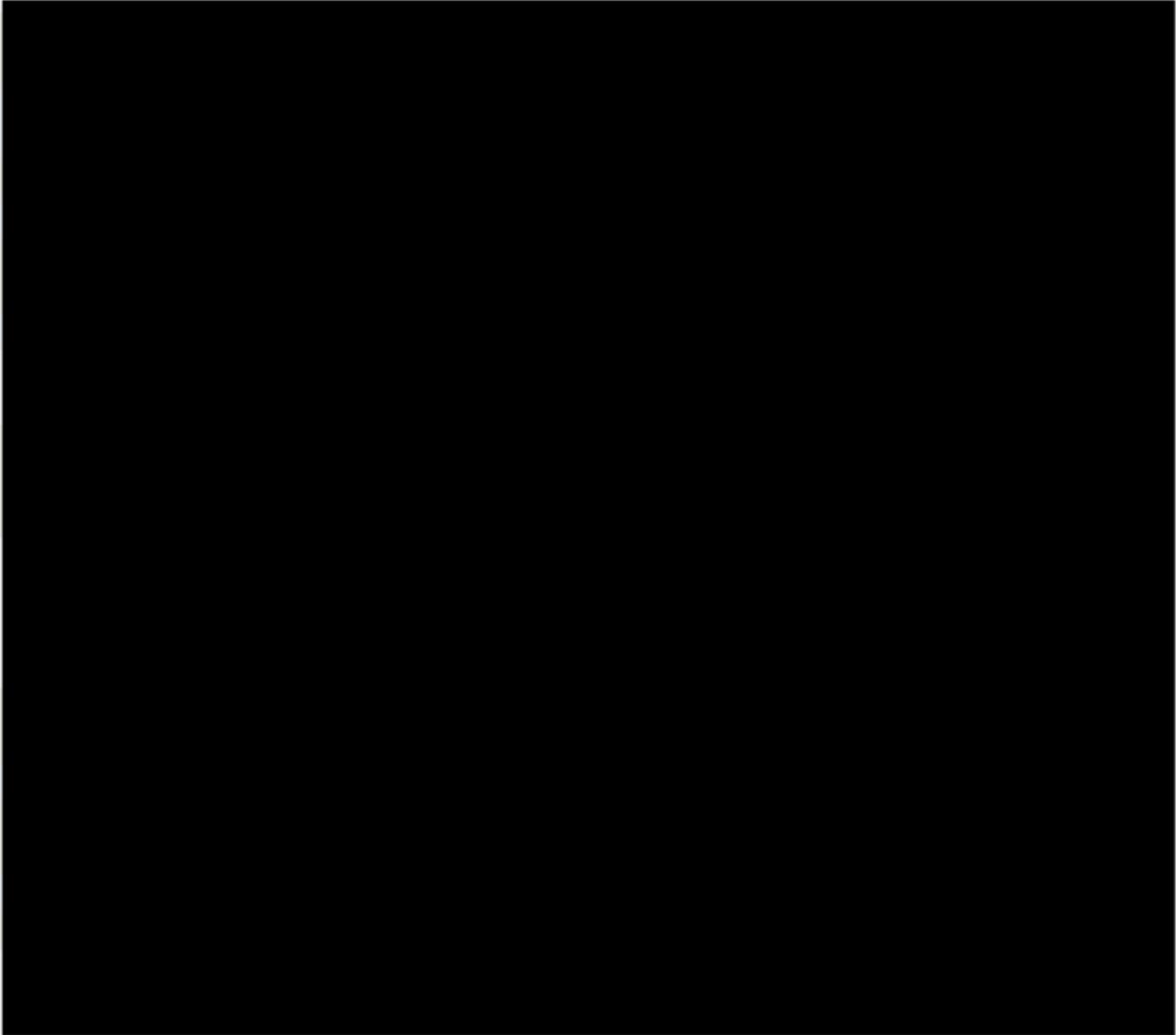


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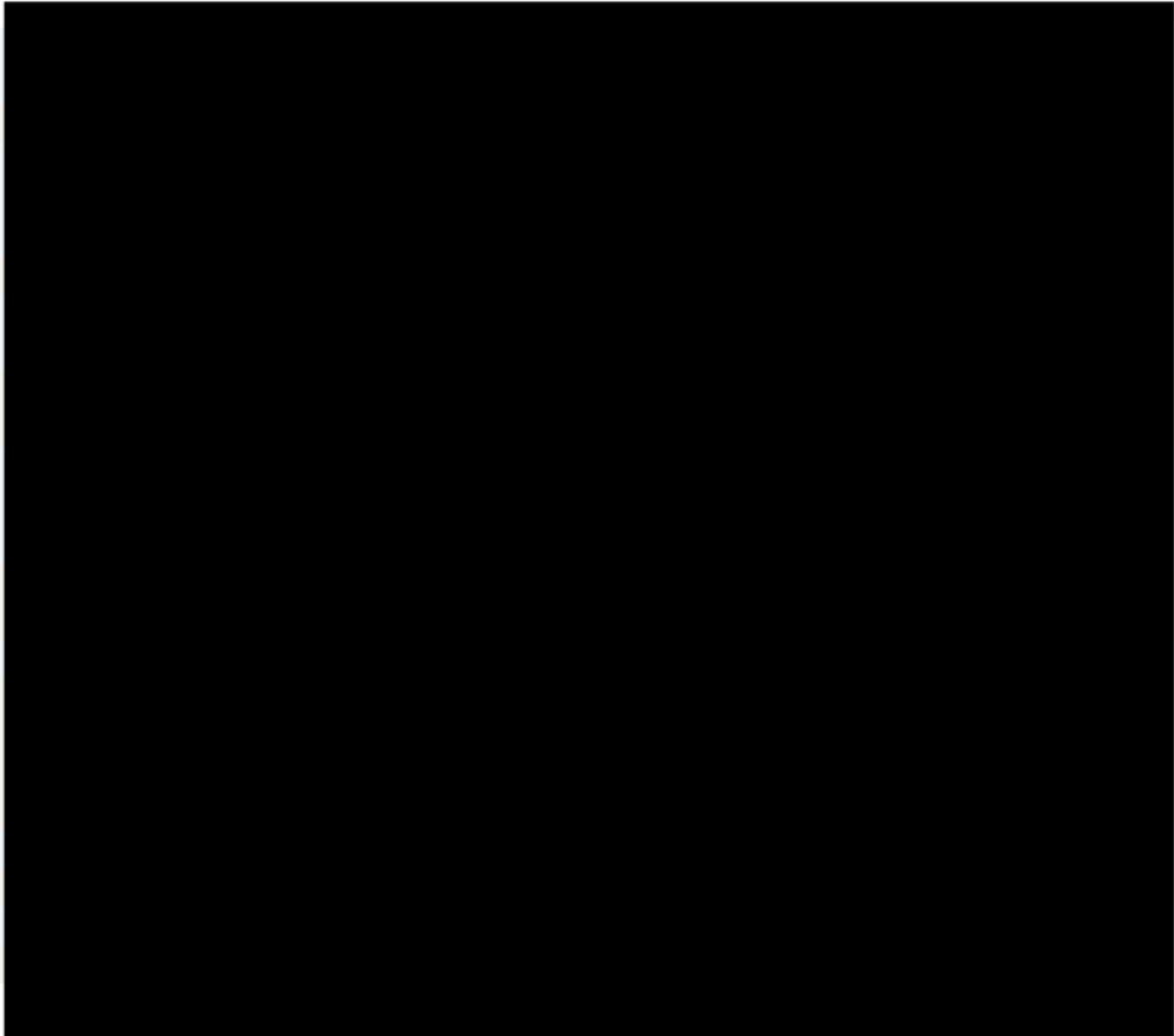


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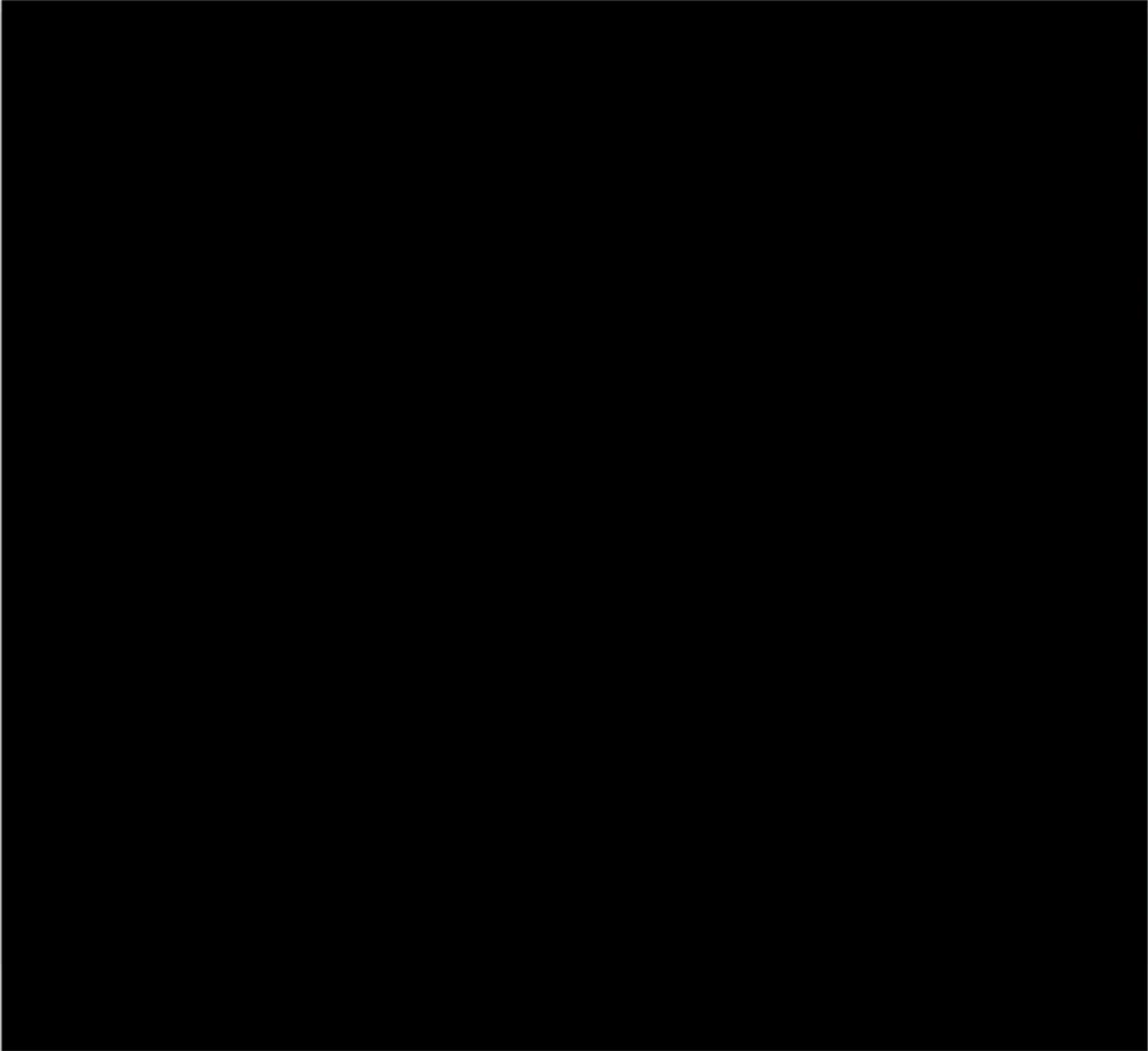


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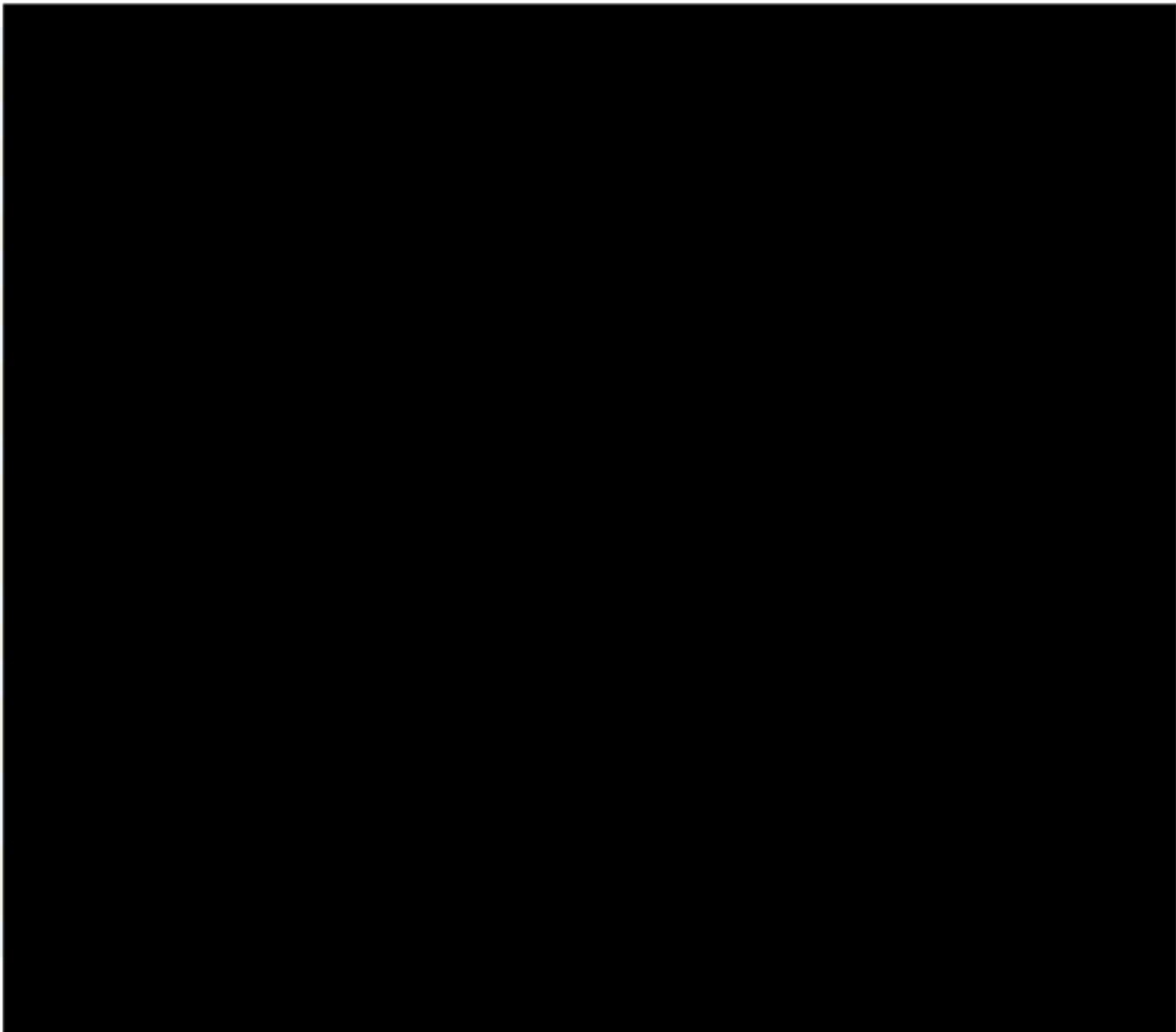
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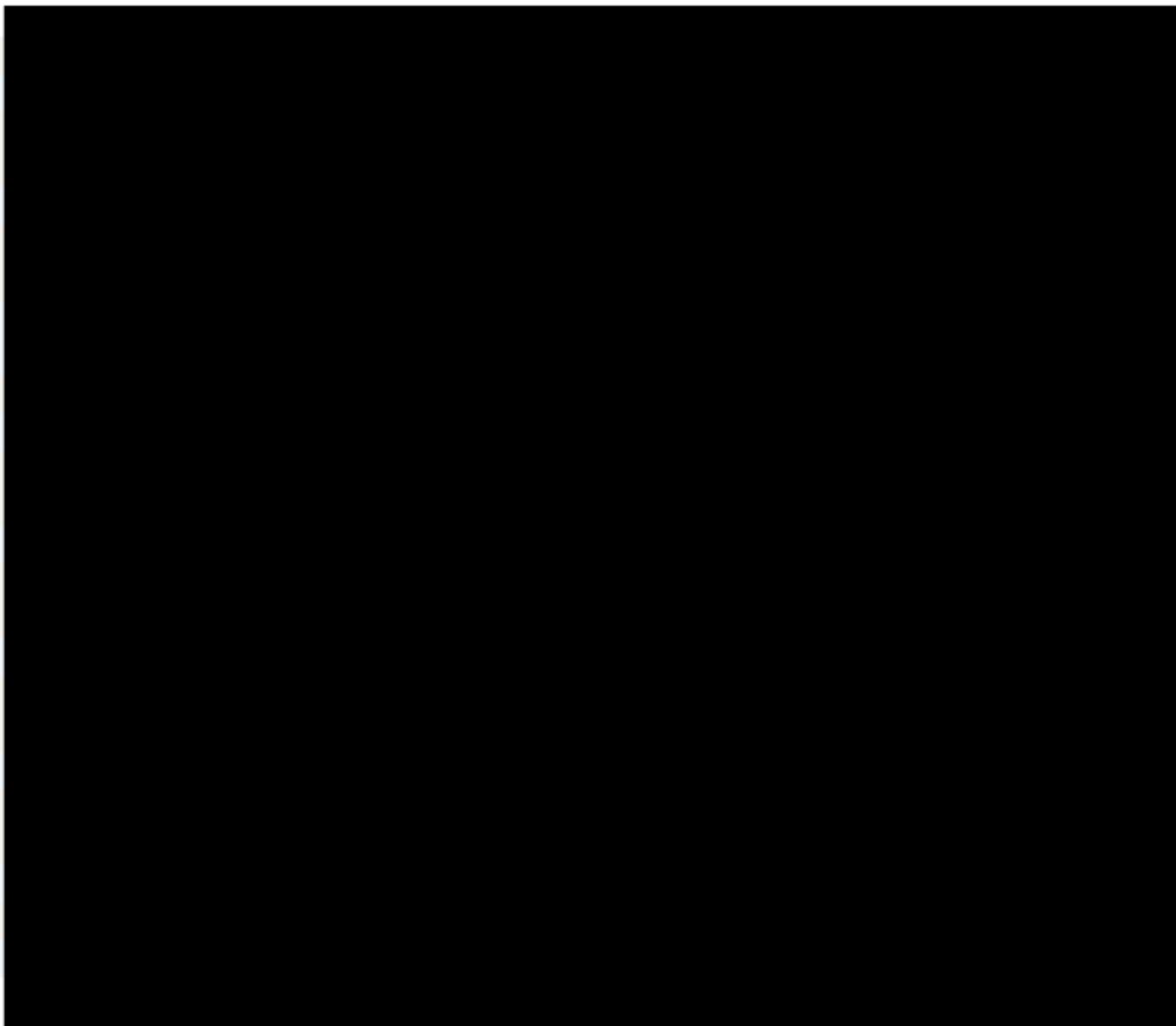
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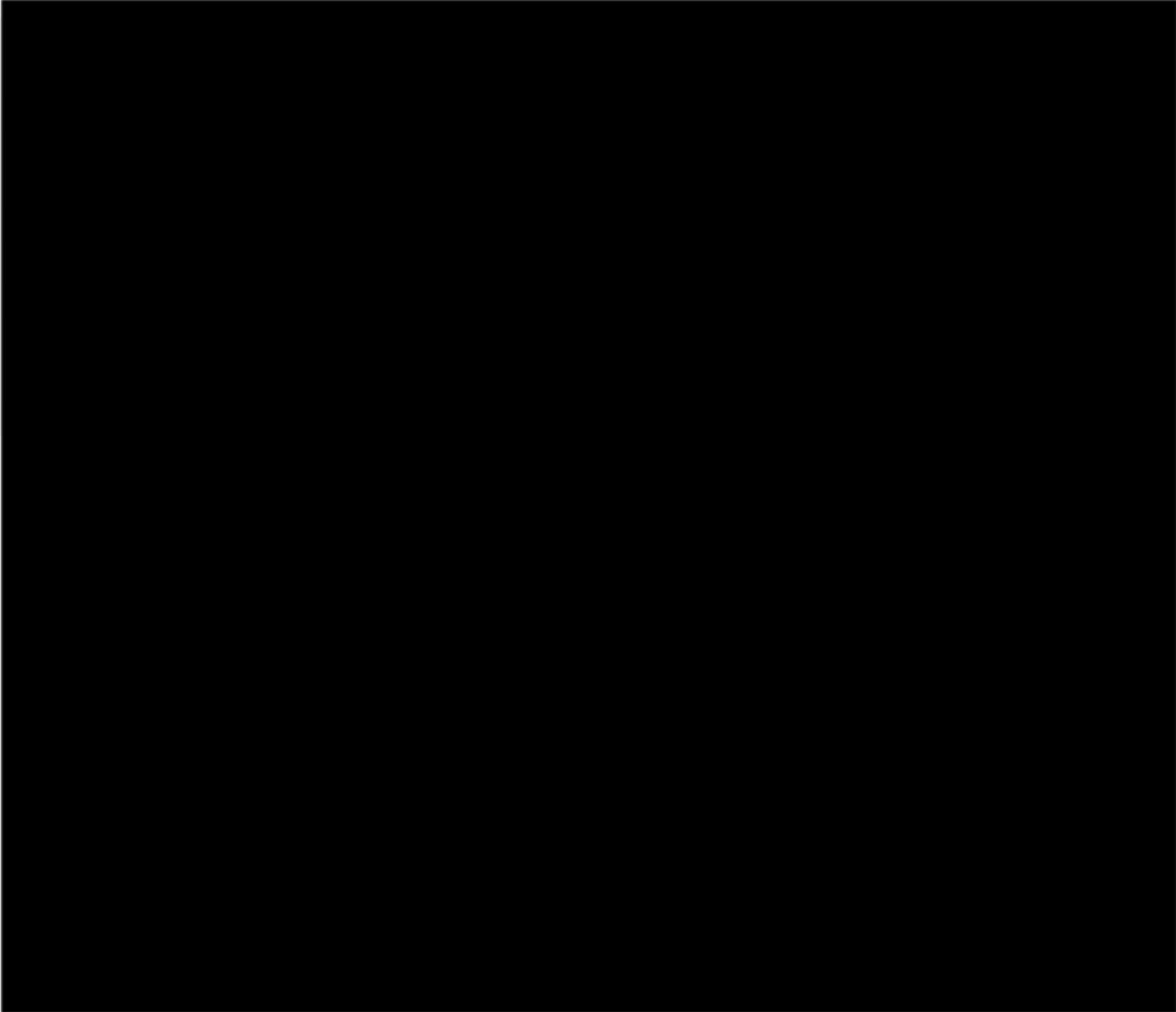
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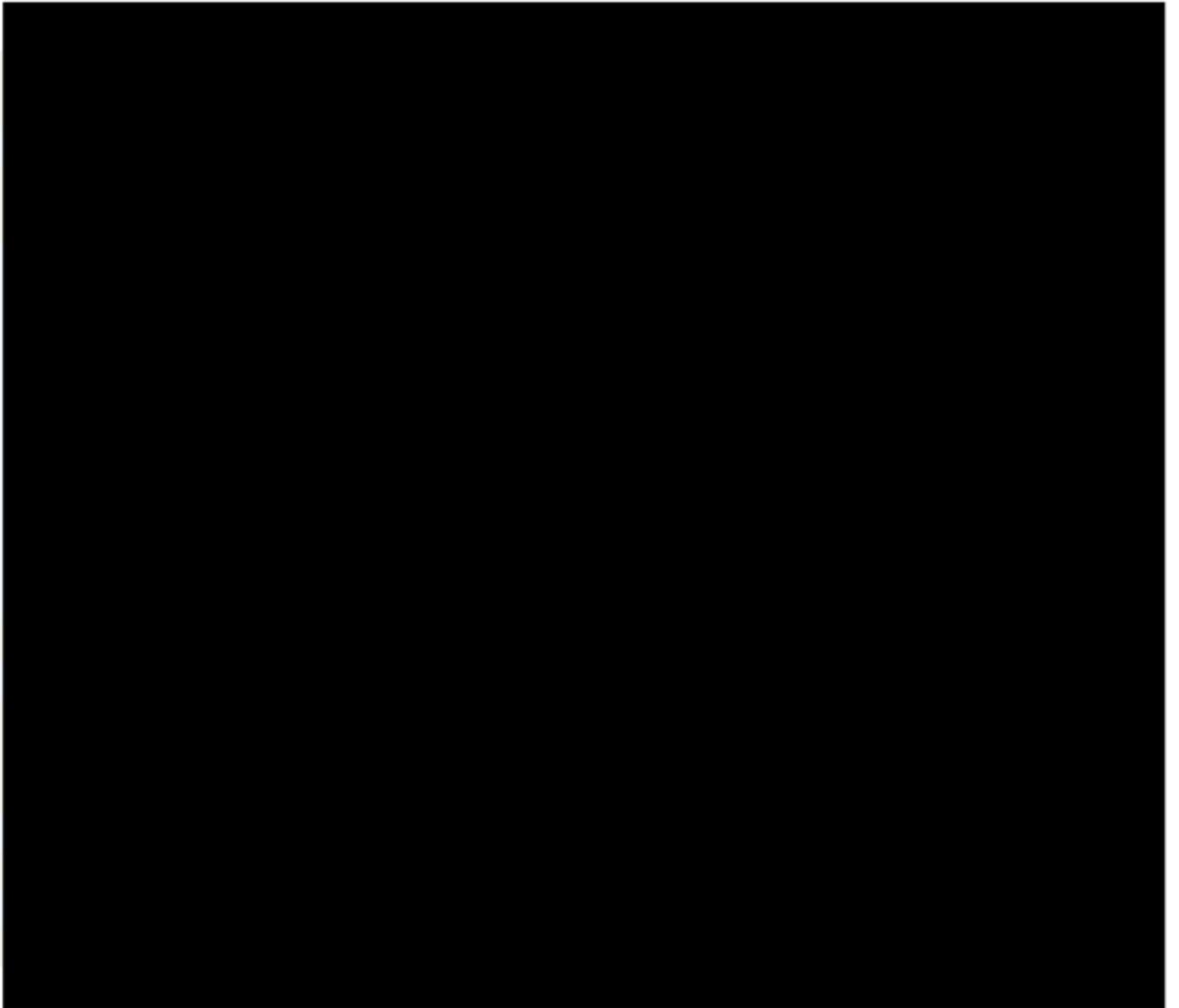
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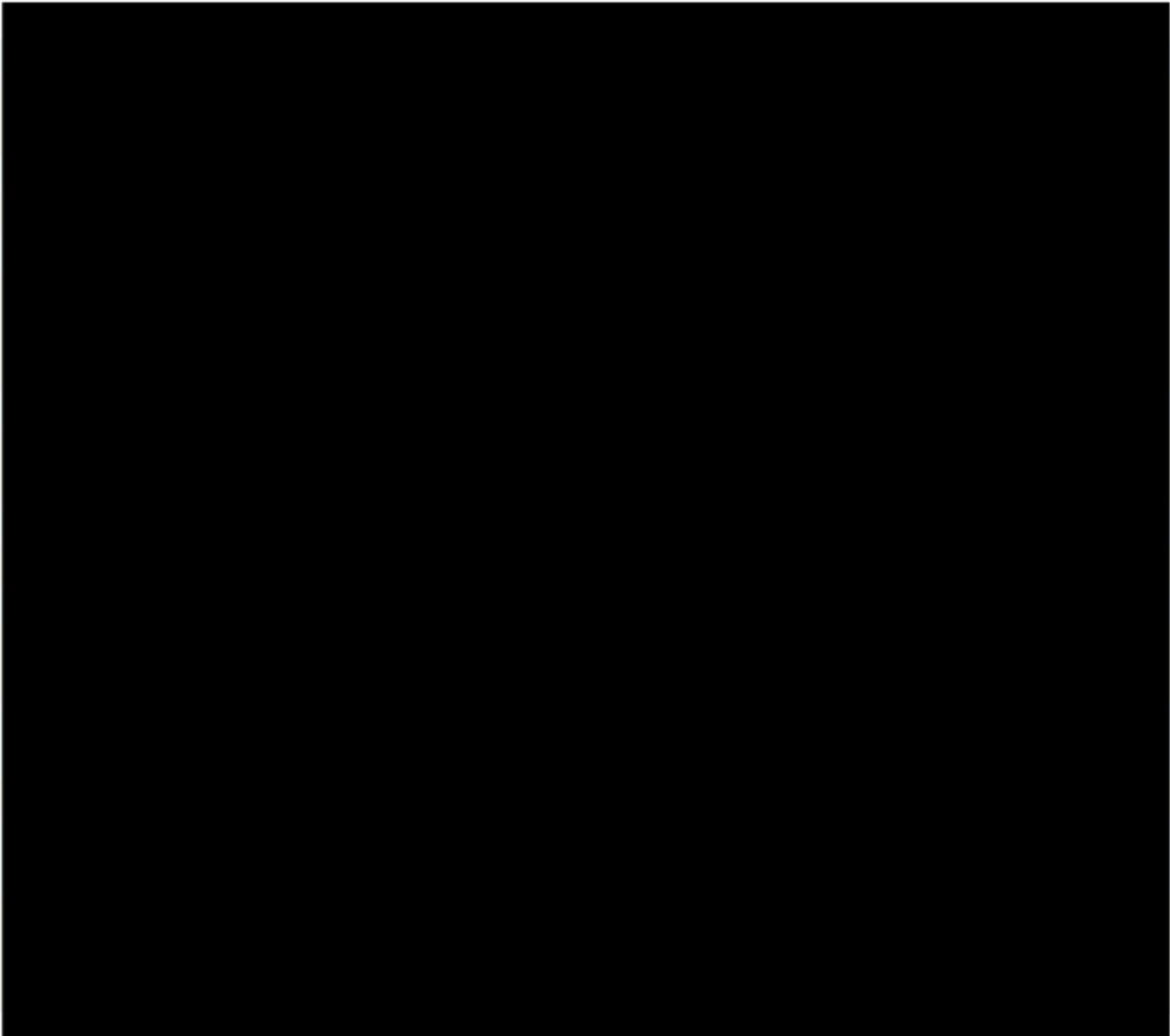
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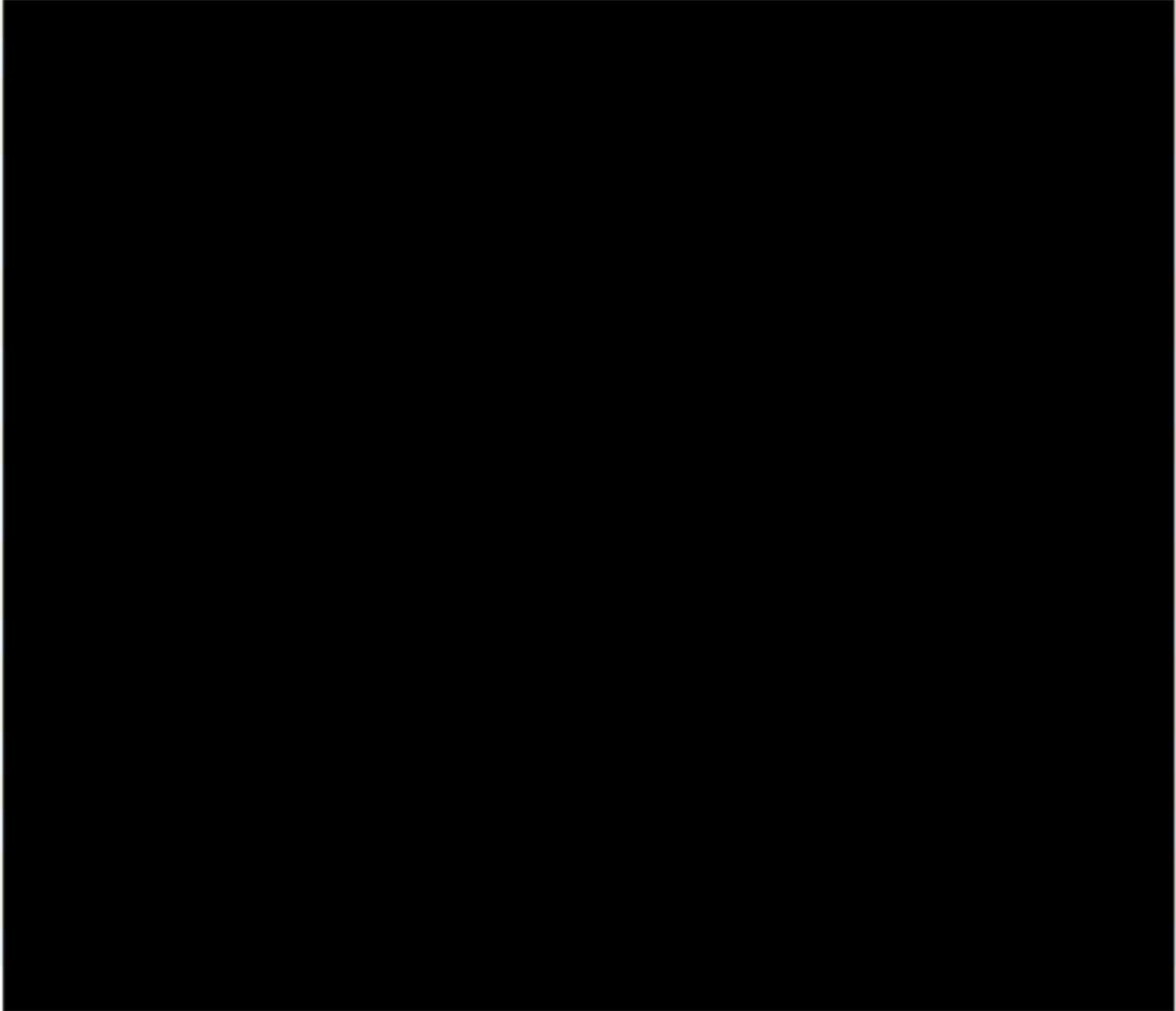
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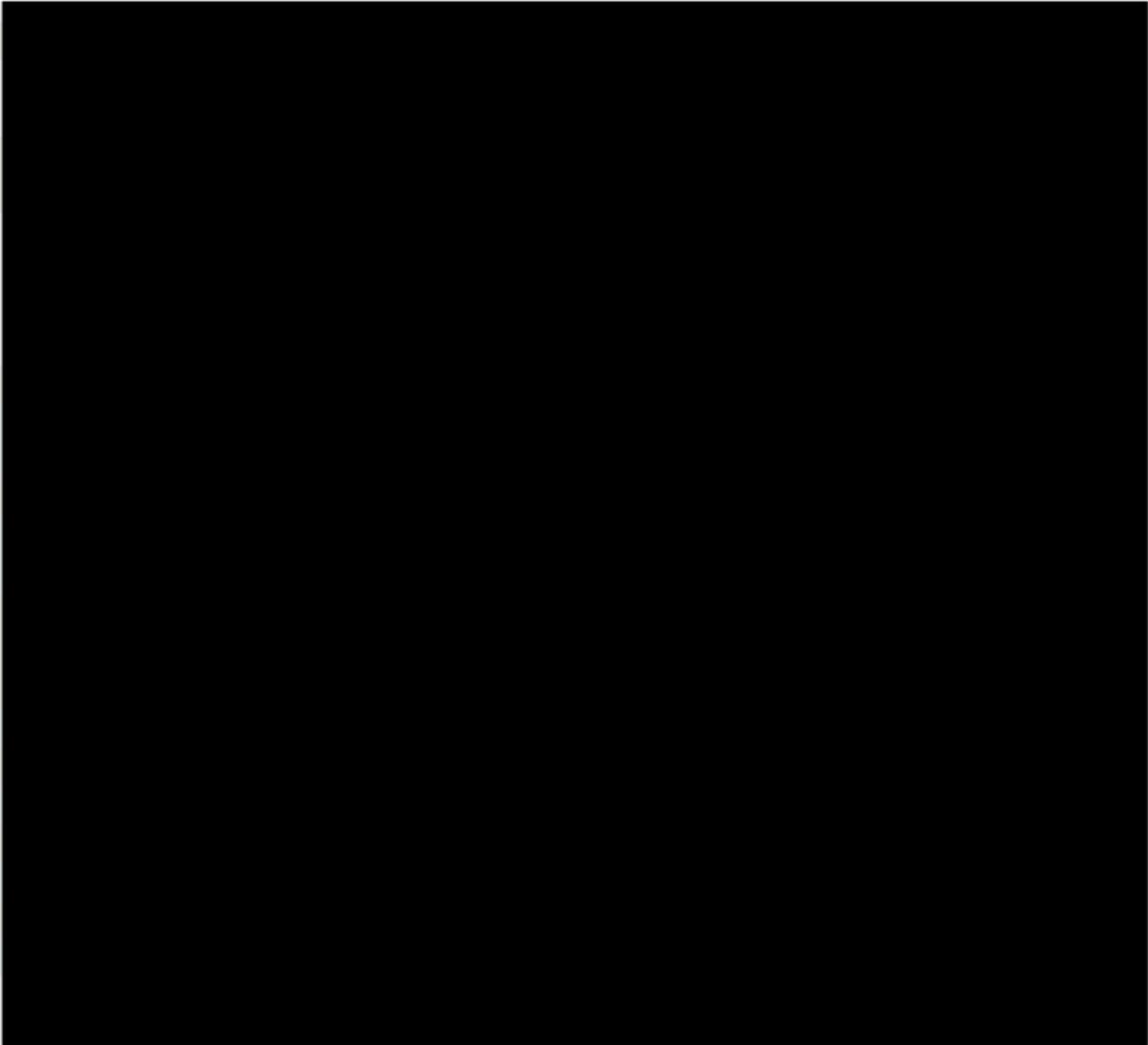


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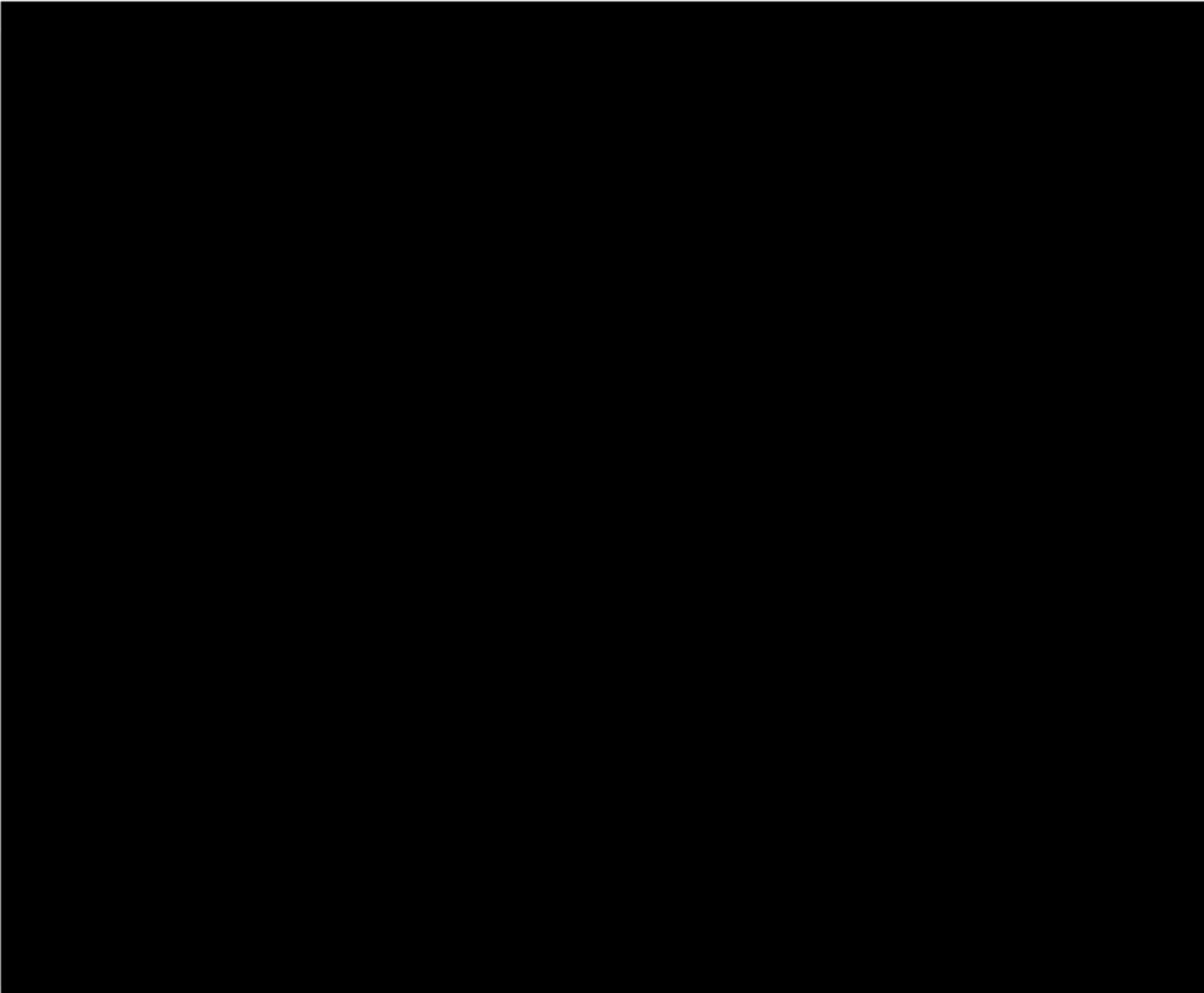


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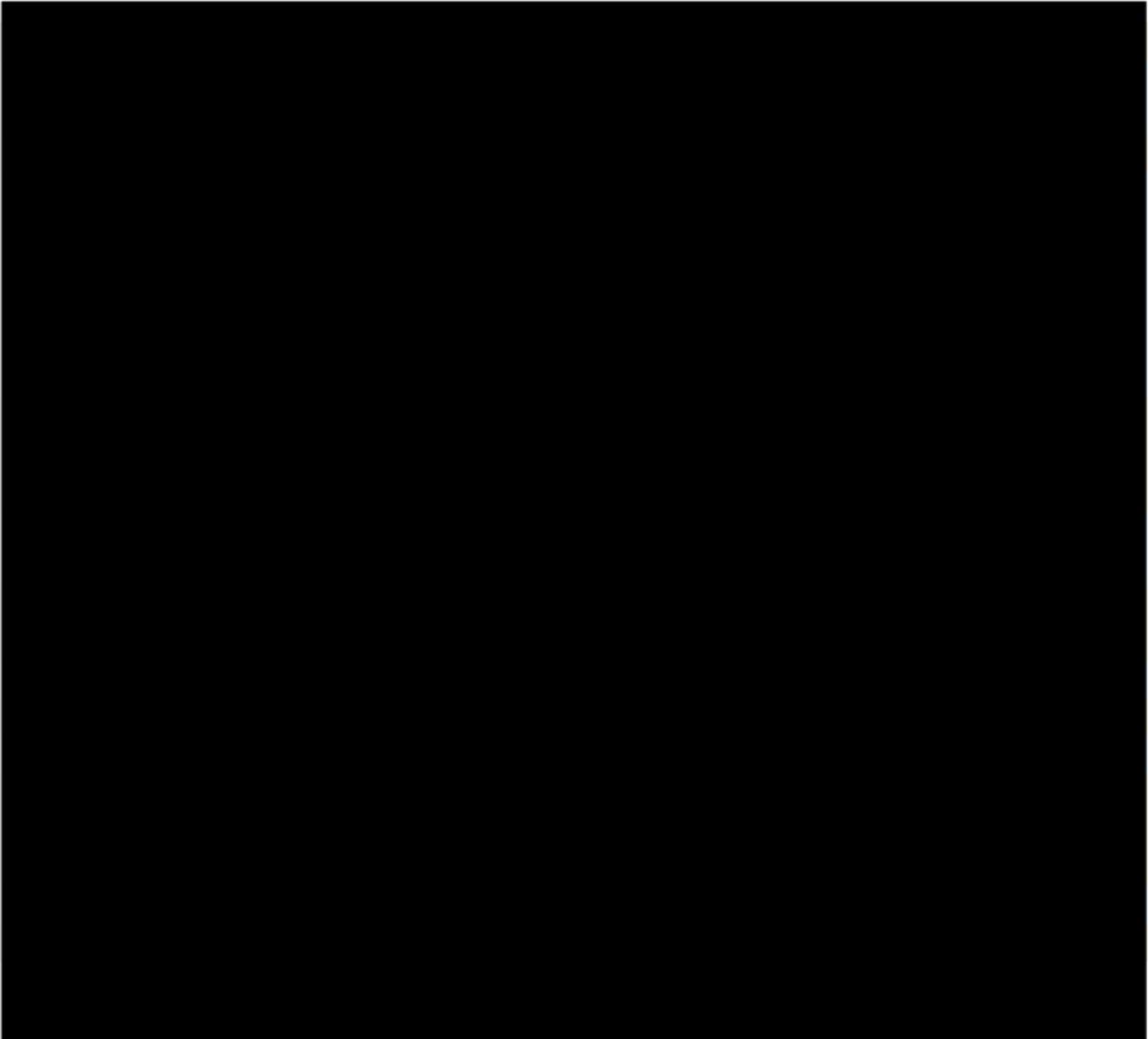
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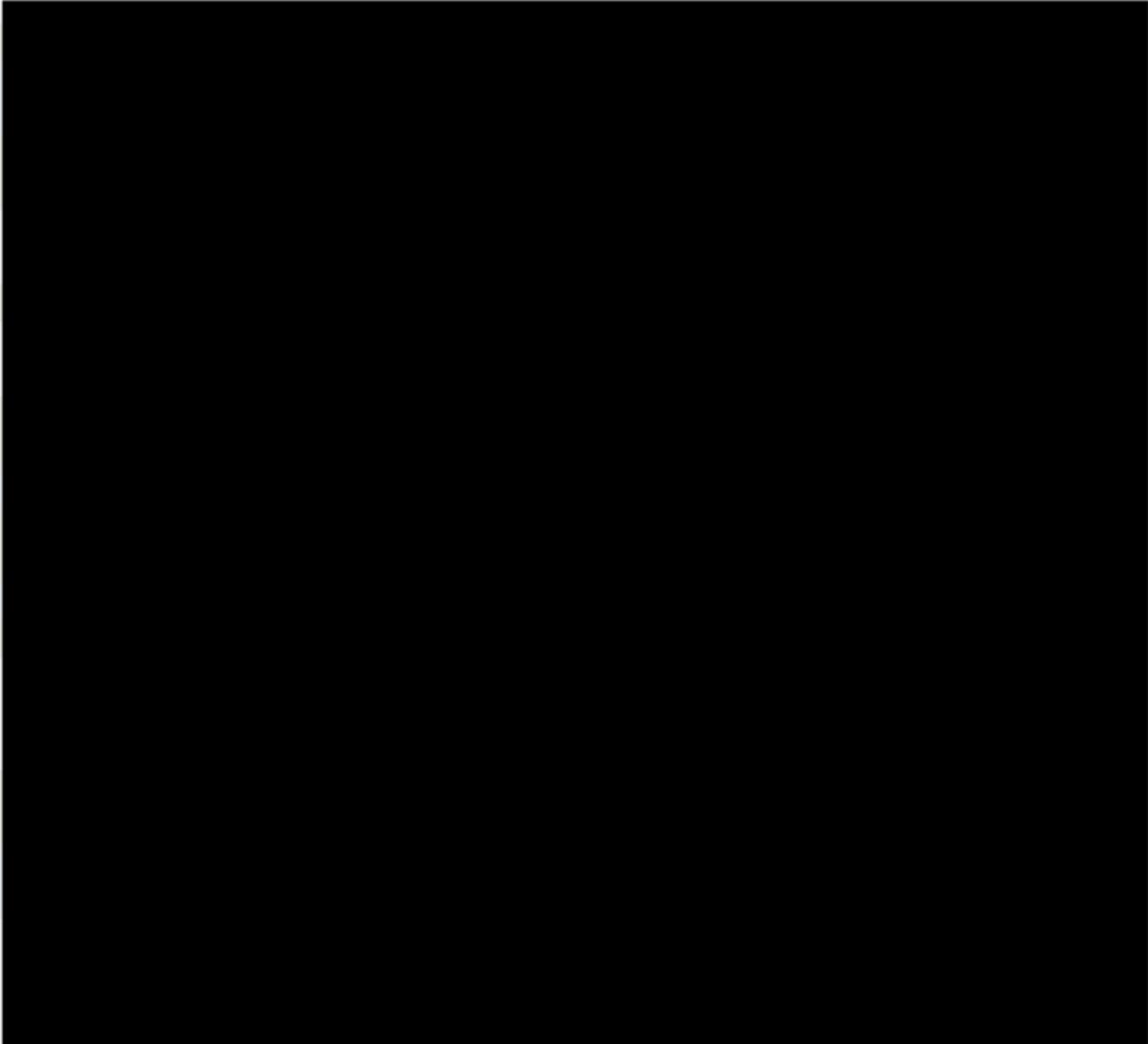


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1 MR. LUTTIER: Yeah.
2 MR. EDWARDS: Yeah.
3 THE VIDEOGRAPHER: Off the record at 5:52.
4 (Witness excused.)
5 (Deposition was adjourned.)
6
7
8

9 CERTIFICATE OF OATH

10 THE STATE OF FLORIDA
11 COUNTY OF PALM BEACH
12

13
14 I, the undersigned authority, certify that
15 L.M. personally appeared before me and was duly
16 sworn on the 24th day of September, 2009.
17

18 Dated this 28th day of September, 2009.
19
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23 _____
24 Cynthia Hopkins, RPR, FPR
25 Notary Public - State of Florida
My Commission Expires: February 25, 2011
My Commission No.: DD 643788

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C E R T I F I C A T E

THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, Cynthia Hopkins, Registered Professional Reporter, Florida Professional Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did report said deposition in stenotype; and that the foregoing pages are a true and correct transcription of my shorthand notes of said deposition.

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

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

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

Dated this 28th day of September, 2009.

Cynthia Hopkins, RPR, FPR

1 DATE: September 28th, 2009
2 TO: L.M.
3 c/o BRAD J. EDWARDS, ESQUIRE
4 ROTHSTEIN, ROSENFELDT, ADLER
5 401 East Las Olas Boulevard
6 Suite 1650
7 Fort Lauderdale, Florida 33301

8 IN RE: ██████ vs. Epstein
9 CASE NO.: 502008CA028051XXXXMB AB

10 Please take notice that on Thursday, the 24th
11 of September, 2009, you gave your deposition in the
12 above-referred matter. At that time, you did not
13 waive signature. It is now necessary that you sign
14 your deposition.

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

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

Cynthia Hopkins, RPR, FPR

I do hereby waive my signature.

L.M.

C E R T I F I C A T E

- - -

THE STATE OF FLORIDA
COUNTY OF PALM BEACH

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

Dated this ____ day of _____,
2009.

L.M.

