

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 2006 CF09454AXX

STATE OF FLORIDA,

-vs-

JEFFREY EPSTEIN,

Defendant.

DEPOSITION OF [REDACTED]

[REDACTED]
[REDACTED]
Palm Beach County Courthouse
205 North Dixie Highway
West Palm Beach, Florida 33401

Reported By:
Judith F. Consor, FPR
Notary Public, State of Florida
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2

1 APPEARANCES:

2 On behalf of the State:

3 [REDACTED], ESQ.
4 ASSISTANT STATE ATTORNEY
401 North Dixie Highway
West Palm Beach, Florida 33401

5 [REDACTED]
6 On behalf of the Defendant:

7 MICHAEL R. TEIN, ESQ.
8 KATHRYN A. MEYERS, ESQ.
LEWIS TEIN, PL
3059 GRAND AVENUE, SUITE 340

Page 1

18 Q. Thank you.
19 May I call you [REDACTED]?
20 A. Uh-huh.
21 Q. [REDACTED], I'm going to ask you a few
22 questions, several questions today. If at any time you
23 want to take a break, you just let me know. Okay?
24 A. Okay.
25 Q. If you at any time don't understand one of

5

1 my questions, will you just please let me know?
2 A. Yes.
3 Q. And if at any time you're not feeling well
4 or something like that, you'll tell us, right?
5 A. Yes.
6 Q. Do you feel okay today?
7 A. Yes.
8 Q. Not taking any alcohol or drugs or anything
9 like that, right?
10 A. No.
11 Q. So you feel ready to have your deposition
12 taken?
13 A. Yes.
14 Q. [REDACTED], what is your address?
15 A. I'm currently living at [REDACTED] house and
16 I don't know it off the top of my head.
17 Q. Where is it?
18 A. [REDACTED].
19 Q. Who is your aunt?
20 A. [REDACTED].
21 Q. Who else is living there?
22 A. [REDACTED].

23 Q. Anyone else living there?

24 A. No.

25 Q. [REDACTED]

6

1 [REDACTED]
[REDACTED] says that you live with
3 [REDACTED] and have been living there; is that
4 correct?

5 A. Yes.

6 Q. How long have you been living with your
7 [REDACTED]?

8 A. Since [REDACTED].

9 Q. That was Thanksgiving of this past year?

10 A. Yes, sir.

11 Q. Okay. Didn't did your [REDACTED]
[REDACTED] get an apartment for the two of
13 you?

14 A. No, sir. He has an apartment, but by
15 himself.

16 Q. Did he get an apartment for the two of you
17 to live in?

18 A. No, sir.

19 Q. Are you planning to move in with him?

20 A. Maybe one day in the future.

21 Q. Do you have a plan to move in with him
22 presently?

23 A. No.

24 Q. Have you been to the apartment that you and
25 [REDACTED] have discussed moving in together?

1 A. I have been to the apartment.
2 Q. Where is that?
3 A. [REDACTED].
4 Q. Have you spent the night over there?
5 A. No, sir.
6 Q. Do you know the address there?
7 A. I do not.
8 Q. Isn't [REDACTED] planning on living
9 with you [REDACTED]?
10 A. No.
11 Q. [REDACTED], you know that this court case is a
12 criminal prosecution, correct?
13 A. Correct.
14 Q. And you know that it's a criminal
15 prosecution against a man who has no criminal background.
16 Do you know that?
17 A. I do now.
18 Q. You agree that court is a very serious
19 matter?
20 A. Yes.
21 Q. And you're here with your lawyer
22 [REDACTED], right?
23 A. Yes.
24 Q. And you know that [REDACTED] recently
25 [REDACTED].

1 [REDACTED].
2 [REDACTED]: Let me just object.
3 [REDACTED], let me instruct you. Anything that
4 you have learned through conversations between you
Page 6

5 and me are protected. So **if** you know any of **that**
6 **information** outside of those discussions, you may
7 answer. But **if** the only way you know **it is**
8 **through** our discussions, do not answer **that**
9 question.

10 BY MR. TEIN:

11 Q. [REDACTED], you know that [REDACTED] recently
12 [REDACTED]
13 [REDACTED].

14 [REDACTED]: Same objection.

15 If you know the answer to that outside of
16 our discussions, you may answer. If it is the
17 only way that you know the answer is through our
18 discussions, do not answer that question.

19 THE WITNESS: Okay.

20 [REDACTED]: Attorney/client privilege.

21 BY MR. TEIN:

22 Q. You can answer the question unless --

23 [REDACTED]: Same objection.

24 MR. TEIN: Let me finish.

25 [REDACTED]: Excuse me. We're --

9

1 MR. TEIN: No. Let me finish.

2 [REDACTED]: Lewis, we're not going to do
3 that.

4 MR. TEIN: My name is not Lewis.

5 I'm going to finish my question. Okay?

6 [REDACTED]: Do not answer until you hear
7 from me.

8 BY MR. TEIN:

9 Q. Other than conversations that you have had
10 with [REDACTED] -- I'm not asking about that -- are you
11 aware that [REDACTED]

[REDACTED]
[REDACTED]?

14 [REDACTED]: Same objection.

15 Anything that you learn through
16 conversations between you and me, do not answer.
17 Those are protected. If you know through any
18 other realm of knowledge, you may answer.

19 THE WITNESS: No.

20 BY MR. TEIN:

21 Q. You have no idea that [REDACTED]

[REDACTED]
[REDACTED]?

24 [REDACTED]: Same objection.

25 Do not answer that question if it's through

10

1 discussions that you and I had. Outside of that,
2 you may answer. So do not answer that question if
3 that is the only basis by which you understand
4 that answer.

5 THE WITNESS: No.

6 BY MR. TEIN:

7 Q. You didn't know that?

8 [REDACTED]: Don't answer that question.

9 Against, it's attorney/client privilege. Any
10 information you've learned through conversations
11 between you and I are protected. If you know it
12 through any other realm, you may answer.

13 MR. TEIN: Are you going to say that for
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14 every question in the deposition, [REDACTED]?

15 [REDACTED]: When you ask improper
16 questions like that without the proper --

17 MR. TEIN: You're going to stop your
18 speaking objections right now. Okay?

19 [REDACTED]: Without the proper --

20 MR. TEIN: You need to stop your speaking
21 objections.

22 Let's continue.

23 [REDACTED]: Counsel, you just asked me a
24 question and I'm going to state it on the
25 record --

11

1 MR. TEIN: You need to stop your speaking
2 objections. Check your rules.

3 [REDACTED]: Excuse me. For the record,
4 Counsel asked me a question. I'll state the
5 answer on the record. He asked me the question am
6 I going to be answering that way throughout the
7 deposition. So long as there's improper
8 foundation and predicate asked by the attorney, I
9 will protect my client and I make the record where
10 appropriate. If counsel wishes to ask an
11 appropriate worded question with the proper
12 foundation and predicate, I will certainly allow
13 the client to answer the question.

14 MR. GOLDBERGER: Why don't you just state
15 attorney/client privilege and just be done with
16 it.

17 [REDACTED]: I want the record to be

18 clear.

19 MR. TEIN: You want to waste time is what
20 you want to do. You were supposed to be here this
21 morning and you totally broke the deal, the
22 agreement that you had with us if your hearing got
23 cancelled.

24 But let's move on and maybe you'll stop
25 obstructing this deposition.

12

1 [REDACTED]: I think the record is very
2 clear where we stand thus far.

3 Is there a recording taken of this
4 deposition?

5 THE COURT REPORTER: Yes.

6 [REDACTED]: Just make sure that's
7 preserved.

8 BY MR. TEIN:

9 Q. Go to Exhibit [REDACTED] -- well, before you do
10 that, [REDACTED], are you aware that [REDACTED]
[REDACTED]?

12 [REDACTED]: Objection.

13 Any conversations that you and I have had
14 regarding that, if that is the only way by which
15 you understand how to answer that question, so not
16 answer. It's attorney/client privilege, as well
17 as any conversations you may have had with the
18 attorney [REDACTED]. That is also attorney/client
19 privilege. And I'm assuming --

20 MR. TEIN: You're actually wrong about the
21 attorney/client privilege.

22 [REDACTED]: I'm assuming Counsel is not
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23 asking you to divulge attorney/client --

24 MR. TEIN: Of course not.

25 BY MR. TEIN:

13

1 Q. [REDACTED], are you aware that [REDACTED]

[REDACTED]?

4 [REDACTED]: Same objection.

5 MR. TEIN: We've heard the objection 10
6 times already.

7 [REDACTED]: Counsel, excuse me.

8 MR. TEIN: Just say attorney/client
9 privilege. Stop interrupting my questions.

10 [REDACTED]: I'm entitled to make an
11 objection for the record, which I'm doing, and
12 I'll make the same objection. And if it calls for
13 attorney/client privilege, any conversations you
14 and I have had, do not answer the question.

15 And I think that it might be appropriate
16 for the record to ask questions via Ms. [REDACTED]
17 as opposed to [REDACTED]. I think that would be more
18 appropriate for this deposition.

19 BY MR. TEIN:

20 Q. Go ahead. Please answer yes or no.

21 A. Yes.

22 Q. Thank you.

23 In fact, you know that [REDACTED]

[REDACTED], don't you?

1 A. After it happened.

2 Q. You know that [REDACTED].

3 don't you, yes or no?

4 A. Yes.

5 Q. In fact, let's go to Exhibit [REDACTED].

6 MR. GOLDBERGER: Look behind you. You'll
7 see it.

8 BY MR. TEIN:

9 Q. Have you ever seen that picture before?

10 A. Yes.

11 Q. Is that a picture of [REDACTED]
[REDACTED]
[REDACTED]?

14 A. Yes.

15 Q. Now you know that this is a very serious
16 matter, don't you?

17 [REDACTED]: Asked and answered.

18 Objection.

19 MR. GOLDBERGER: All right. You can
20 object. You're representing a witness here,
21 [REDACTED]. You can object on privilege grounds.
22 You cannot make legal objections. You have no
23 standing to do so.

24 [REDACTED]: I'm going to make them and
25 then --

1 MR. GOLDBERGER: We're --

2 [REDACTED]: We're going to leave or we're
3 going to take a break because his demeanor is not
4 appropriate. There's no reason to have this kind

5 of demeanor. If you want to have this kind of
6 demeanor with me --

7 MR. TEIN: You are obstructing this
8 deposition.

9 MR. GOLDBERGER: Why don't you guys go
10 outside and just talk about --

11 [REDACTED]: She -- her job is very
12 difficult and she's not going to be able to take
13 us both talking at the same time.

14 MR. GOLDBERGER: Off the record.

15 [REDACTED]: We're not going off the
16 record, Jack. We're not, Jack. Her job is very
17 difficult. I'm going to make the record.

18 I don't think it is appropriate, especially
19 in the small confines of this room, to be very
20 aggressive with this young lady.

21 MR. TEIN: That's not happening. Stop,
22 stop actually --

23 [REDACTED]: If you're going to interrupt
24 me, we're going to cancel this deposition --

25 MR. TEIN: Stop misrepresenting.

16

1 THE COURT REPORTER: I need on at a time,
2 no matter who it is.

3 [REDACTED]: I think we're going to take a
4 break. Perhaps you might want to talk to your
5 co-counsel --

6 MR. TEIN: I don't need to talk to him.

7 [REDACTED]: But we're going to take a
8 break.

9 MR. TEIN: Not taking a break unless the
10 witness needs a break.

11 You're obstructing this deposition, [REDACTED].

12 [REDACTED]: Come on, [REDACTED].

13 You all want to continue in this
14 demeanor --

15 MR. TEIN: You're obstructing the
16 deposition. Stop making speeches. We're not
17 discussing this with you. The questions are to
18 your client. Go take your five-minute break.

19 [REDACTED]: Fine. We need to make sure
20 the record's clear and clean.

21 And I want to make sure as I've already
22 asked you -- I know that you're one of the best in
23 town -- that this audio -- this needs to be
24 preserved. Okay?

25 MR. TEIN: Go take your five-minute break,

17

1 [REDACTED], now.

2 You were supposed to be here at nine a.m.;
3 it's now after two. Take your break and come
4 back.

5 [REDACTED]: Okay. If the demeanor keeps
6 up, we will not be here beyond those five minutes.

7 MR. TEIN: Take your break and come back.

8 [REDACTED]: Okay. So I suggest that you
9 relax.

10 MR. TEIN: I suggest that you take your
11 break.

12 MR. GOLDBERGER: Let them take that
13 five-minute break.

14 [REDACTED]: But I would suggest that you
15 take deep breaths.

16 MR. TEIN: Suggest whatever you want. Go
17 take a break.

18 (Thereupon, a recess was taken.)

19 BY MR. TEIN:

20 Q. [REDACTED], you agree that giving testimony
21 today at your deposition is something very serious, don't
22 you?

23 A. Yes.

24 Q. And you respect the court, don't you?

25 A. Yes.

18

1 Q. Let me show you Exhibit [REDACTED]. Can you
2 read that out loud, please?

3 A. Okay. What do you want?

4 Q. Will you read that out loud, please.

5 A. Oh.

6 Q. Thank you.

7 A. Lol hah my baddd...lol yah i got some
8 stupid court shit [REDACTED]...bullshit...and damn you
9 still have court shit with him? Like after so long wow
10 im sorry... well yah well we will definitely havta make
11 plans for sure..because i miss u tons times a million and
12 no no no i love you...o p.s. i love ur default pic
13 niggaa. Muah xo.

14 Q. Did you send that message last week to a
15 friend of yours on MySpace?

16 A. I wouldn't know. There's no dates and I've
17 deleted that MySpace, so --

18 Q. We're going to talk about that in a second.
19 A. Okay.
20 Q. Did you send that message last week --
21 A. Right.
22 Q. Let me finish my question.
23 Did you send that message last week to a
24 friend of yours on MySpace?
25 A. I wouldn't know the date, but obviously,

19

1 it's to a friend.
2 Q. Did you send that message to a friend of
3 yours on MySpace?
4 A. Sure, yes.
5 Q. Were you referring to this deposition?
6 A. Yes.
7 Q. Do you find the term n-i-g-g-e-r offensive?
8 A. That's not anywhere in there.
9 Q. What word did you use in there?
10 [REDACTED]: Where are you referring to,
11 Counsel? There's 20 plus words in there.
12 MR. TEIN: Don't make a speaking objection.
13 THE WITNESS: Are you referring to
14 anything --
15 [REDACTED]: No, [REDACTED]. Don't -- don't --
16 let him ask you the question.
17 BY MR. TEIN:
18 Q. What question were you asking, [REDACTED]?
19 [REDACTED]: She doesn't ask questions.
20 You ask the questions. What is the question
21 pending?
22 BY MR. TEIN:

23 Q. [REDACTED], what is the last word on there in
24 the text of your message before the closing?

25 A. Niggaa.

20

1 Q. Don't you find that term offensive?

2 A. No.

3 [REDACTED]: Can you spell it for the
4 record, please.

5 THE WITNESS: N-i-g-g --

6 MR. TEIN: No, no, no. You are not going
7 to be asking questions.

8 [REDACTED]: I'm not asking questions.
9 I'm asking for the record the word to be spelled
10 because we don't have a video here today.

11 MR. TEIN: These exhibits are part of the
12 record. You --

13 [REDACTED]: Well, it's not marked as an
14 exhibit.

15 MR. TEIN: Stop interrupting me,
16 [REDACTED]. I have marked and identified as an
17 exhibit and you will get it.

18 [REDACTED]: There has been no
19 identification of this document in the record.

20 MR. TEIN: [REDACTED], stop interrupting
21 this deposition.

22 [REDACTED]: What is the exhibit number
23 marked for identification?

24 MR. TEIN: [REDACTED].

25 [REDACTED]: Do we have copies? Is it on

1 the record anywhere?

2 BY MR. TEIN:

3 Q. Let me ask you, [REDACTED], did you in fact
4 write your friend this message about this deposition?

5 A. Yes.

6 Q. So you wrote your friend that this
7 deposition is stupid court s-h-i-t, correct?

8 A. Yes.

9 Q. Because you think this deposition is stupid
10 court s-h-i-t, don't you?

11 A. No.

12 Q. You wrote that to your friend, didn't you?

13 A. Yes.

14 Q. You think that court is stupid, don't you?

15 A. In some cases.

16 Q. And you think that court is bull s-h-i-t,
17 don't you?

18 A. No.

19 Q. And you think this deposition is bull
20 s-h-i-t, don't you?

21 A. No.

22 Q. You wrote that to your friend, didn't you?

23 [REDACTED]: Objection. Asked and
24 answered.

25 MR. TEIN: That's not an objection.

1 BY MR. TEIN:

2 Q. You wrote that to your friend, didn't you?

3 [REDACTED]: Objection. Asked and
4 answered, for the fourth time.

5 MR. TEIN: You are **improperly objecting,**
6 **[REDACTED]**. You have no grounds to object. And
7 **that's not an objection.**

8 **[REDACTED]**: **It is an objection.**

9 MR. TEIN: Then **terminate the deposition if**
10 **you think it's been asked and answered.**

11 **[REDACTED]**: **Counsel, I am not precluded**
12 **from just making an objection to the form of the**
13 **question. As the courts well know, and if you**
14 **practice here in West Palm Beach, many of the**
15 **judges require you to set the objection with**
16 **specificity. And I will do that. And if you**
17 **don't want me to, you can make the record. But I**
18 **will do that.**

19 MR. TEIN: Here's what we'll do, **[REDACTED]**. You
20 can -- **I will allow you to reserve an objection to**
21 **form for every single one of my questions.**
22 **Otherwise, all you're doing is obstructing.**

23 **[REDACTED]**: **I won't do that.**

24 MR. TEIN: Of course; because you want to
25 **obstruct.**

23

1 **[REDACTED]**: **All right.**

2 BY MR. TEIN:

3 Q. **[REDACTED]**, you **think that giving testimony**
4 **today, under oath, is bull s-h-i-t, don't you?**

5 A. **No.**

6 Q. **And you wrote that to your friend on**
7 **MySpace last week, didn't you?**

8 **[REDACTED]**: **Objection. Asked and**

9 answered.

10 THE WITNESS: No, I did not.

11 BY MR. TEIN:

12 Q. You didn't write this exhibit?

13 A. I wrote that, but I didn't write what you
14 said.

15 Q. You wrote in this exhibit, "I got some
16 stupid court s-h-i-t [REDACTED]. Bull s-h-i-t." Didn't
17 you write that?

18 A. Yes.

19 Q. Referring to this deposition, didn't you?

20 A. Referring to the court. I was later
21 informed that it was a deposition.

22 Q. I'm going to ask you some questions now
23 about what happened when you went to Jeff Epstein's house
24 [REDACTED] years ago. Okay?

25 A. Uh-huh.

24

1 Q. When the police interviewed you [REDACTED]
2 after you went to Epstein's house, you swore on your
3 mother's grave that you and Epstein did not engage in sex
4 of any kind?

5 A. Yes.

6 Q. Didn't you tell that to the police?

7 A. Yes. And I will continue. I have never
8 had sex with him.

9 Q. Did what happened upstairs at Jeff
10 Epstein's house take you completely by surprise, [REDACTED]?

11 A. Yes.

12 Q. Now the [REDACTED]
[REDACTED]

14 [REDACTED]

[REDACTED].

16 A. Yes.

17 Q. Were you **totally** shocked by what happened
18 when you got to Epstein's house?

19 A. Yes.

20 Q. You **didn't** expect **it** at all, did you?

21 A. No.

22 Q. You had **absolutely no idea** why your friend
23 [REDACTED] was **taking you to Epstein's shoes, right?**

24 A. **I was informed it was a massage.**

25 Q. **All you thought that it was going to be was**

25

1 **a massage, correct?**

2 A. Yes.

3 Q. **Before you got to Epstein's house** [REDACTED]

4 **never said anything to you on the telephone about sexual**
5 **activity with Epstein, did he?**

6 A. No.

7 Q. **And before you got to Epstein's house**

8 [REDACTED] **never sent you a message over the Internet about**
9 **sexual activity with Epstein, did she?**

10 A. No.

11 Q. **Did** [REDACTED] **ever try to convince you to**
12 **engage in any sexual activity with Epstein?**

13 A. No.

14 Q. **Did** [REDACTED] **every try to convince**
15 **you to engage in any sexual activity with Epstein?**

16 A. **I don't know who** [REDACTED] **is.**

17 Q. **Do you have a friend** [REDACTED] **?**

18 A. No.

19 Q. Okay. Before you went so Epstein's house
20 did anyone call or e-mail you to induce you to engage in
21 sexual activity with Epstein?

22 A. No.

23 Q. So you're sure that before you got to
24 Epstein's house no one tried to persuade you to engage in
25 sexual activity with [REDACTED] Epstein?

26

1 A. No.

2 Q. You're sure that -- let me ask the question
3 again.

4 You're sure that before you got to
5 Epstein's house no one tried to persuade you to engage in
6 sexual activity with Epstein for money. Are you?

7 [REDACTED]: Objection. Asked and
8 answered.

9 THE WITNESS: No. And I've already
10 answered that a bazillion times.

11 BY MR. TEIN:

12 Q. He's coaching you now. So I'm going to ask
13 the question --

14 [REDACTED]: Counsel, I've made an
15 objection for the record.

16 MR. TEIN: Stop speaking.

17 [REDACTED]: I'm not going to stop
18 speaking. You can't interrupt me when I'm making
19 the record.

20 MR. TEIN: You're coaching the witness.

21 [REDACTED]: Counsel --

22 MR. TEIN: Stop coaching the witness.
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23 BY MR. TEIN:

24 Q. [REDACTED], let me ask you --

25 [REDACTED]: If you continue to --

27

1 MR. TEIN: Stop interrupting my questions.

2 [REDACTED]: If you do it one more time,

3 we're leaving.

4 BY MR. TEIN:

5 Q. [REDACTED] --

6 [REDACTED]: I'm going to make the record.

7 You cannot interrupt me when I'm making the
8 record. Out of professional conduct, you cannot
9 do that. I'm entitled to make the record. I made
10 an objection, asked and answered. You demeanor is
11 inappropriate. You're willing and you are able
12 and you're responsible to ask a question in a
13 professional manner and ask the question and once
14 you get the answer, to either follow up on it or
15 move on, but not continuously browbeat and ask the
16 same question over and over because you don't like
17 the answer.

18 MR. TEIN: Calm down, sir.

19 [REDACTED]: Trust me, I'm very calm here.

20 When I'm not calm you'll know it. I'm very calm.

21 So please continue on, but I will not allow
22 you to continue to harass her in the demeanor that
23 you're doing. Ask her a question and move on.

24 MR. TEIN: Are you done?

25 [REDACTED]: Thank you. I am.

1 MR. TEIN: Stop misrepresenting the record
2 and calm down. I'm going to ask my question.
3 Stop it.

4 BY MR. TEIN:

5 Q. [REDACTED] --

6 [REDACTED]: I think the record is very
7 clear.

8 MR. GOLDBERGER: Let me just clarify
9 something. When you object to the form of a
10 question, you're not instructing the witness not
11 to answer the question, are you?

12 [REDACTED]: No. And I'm not making that
13 objection; only on attorney/client privilege.

14 MR. TEIN: Will you stop speaking now so I
15 can ask my question? Are you done?

16 Okay. I'm going to ask my question.

17 BY MR. TEIN:

18 Q. Listen, [REDACTED] --

19 [REDACTED]: Hold on. Stop.

20 I've been doing this for 20 plus years and
21 have met a lot of attorneys, but I've never had an
22 experience like this where I've --

23 MR. TEIN: Stop your speeches.

24 [REDACTED]: If you continue to do this,
25 whether it's with me or with my client, I will not

1 put up with it and I don't need to put up with it
2 and it's not appropriate. And I'm sure Mr.
3 Goldberger knows all this, because I know that he
4 wouldn't do this. So I will not put up with it.

5 And I think it's highly inappropriate to do this
6 with this child sitting here, the way you're
7 acting, primarily towards me, and I will not put
8 up with it.

9 MR. TEIN: Will you please stop your speech
10 so I can ask questions?

11 [REDACTED]: So long as you act
12 professionally, I will do so. But if you continue
13 to do it this way, I will leave.

14 MR. TEIN: Suit yourself.

15 BY MR. TEIN:

16 Q. [REDACTED], are you sure that before you got to
17 Epstein's house no one tried to persuade you to engage in
18 sexual activity with Epstein for money?

19 [REDACTED]: Asked and answered.

20 Objection.

21 MR. TEIN: Did you get her answer?

22 THE COURT REPORTER: No, I did not.

23 THE WITNESS: I'm sure.

24 BY MR. TEIN:

25 Q. Let me ask you a few questions about your

30

1 contact with [REDACTED] Epstein. Okay?

2 A. (Witness nods head up and down.)

3 Q. Jeff never e-mailed you, did he?

4 A. No.

5 Q. Jeff never text messaged you, did he?

6 A. No.

7 Q. Jeff never chatted in a chat room with you,
8 did he?

- 9 A. No.
- 10 Q. Before you got to Epstein's house you had
- 11 never spoken to Jeff, had you?
- 12 A. No.
- 13 Q. And before you got to Epstein's house you
- 14 had never met Jeff?
- 15 A. Correct.
- 16 Q. Before you got to Epstein's house you had
- 17 never told Jeff that you were under 18, right?
- 18 A. No.
- 19 Q. Before you got to Epstein's house had you
- 20 ever told [REDACTED] that you were under 18?
- 21 A. No, I never spoke to the man before that.
- 22 Q. And you only went to Jeff Epstein's house
- 23 that one time [REDACTED] years ago, correct?
- 24 A. Yes.
- 25 Q. You never went there again, correct?

31

- 1 A. No.
- 2 Q. All right. Let me ask you two final areas
- 3 of questioning about this and we'll move onto something
- 4 else. Okay?
- 5 A. Uh-huh. Yes. I'm sorry.
- 6 Q. Before you got to Epstein's did anyone
- 7 associated with Epstein ever call you on the phone and
- 8 try to persuade, induce, entice or coerce you to engage
- 9 in any sexual activity?
- 10 A. No.
- 11 Q. Before you got to Epstein's did anybody
- 12 associated with Epstein ever contact you on the Internet
- 13 and try to persuade, induce, entice or coerce you to

14 engage in any sexual activity?

15 A. No.

16 Q. [REDACTED], who told you that when you got to
17 Jeff Epstein's house you should lie to Jeff about your
18 age?

19 A. [REDACTED].

20 Q. Was it [REDACTED] or was it the other girl in
21 the car who you rode over with to Epstein's house?

22 A. [REDACTED].

23 Q. Who was the other girl in the car with you
24 that day?

25 A. I honestly don't know.

32

1 Q. Had you ever seen her before?

2 A. No, sir.

3 Q. You told the police that when you rode over
4 to Epstein's you had no idea who she was, right?

5 A. Correct.

6 Q. You told the police that you didn't know
7 her name, but she was [REDACTED]
[REDACTED]?

9 A. Yes.

10 Q. Those were your words, right?

11 A. Yes.

12 Q. Do you now know who she is?

13 A. No, sir.

14 Q. So it was [REDACTED] who told you to lie about
15 your age to Jeff Epstein?

16 A. Yes, sir.

17 Q. And [REDACTED] told you that if you weren't 18,

18 Epstein wouldn't let you into his house, right?
19 A. That's -- yes, yes.
20 Q. All right. Let's talk for a minute about
21 when you first met Jeff. Okay?
22 A. Sure.
23 Q. When you first met Jeff he tried to find
24 out how old you were, right?
25 A. Excuse me?

33

1 Q. When you first met Jeff he tried to find
2 out how old you were, right?
3 A. Not when we first introduced each other;
4 when we get upstairs, then yes.
5 Q. During the massage Jeff asked you how old
6 you were, correct?
7 A. Yes, yes.
8 Q. Now hadn't you already told Jeff's
9 assistant, the one who walked you upstairs, that you went
10 to college and had just moved down here [REDACTED]?
11 A. I never spoke to the lady.
12 Q. Do you want to rethink that answer?
13 [REDACTED]: Is that a question?
14 BY MR. TEIN:
15 Q. Do you want to rethink that answer?
16 A. No. I didn't really speak with her that
17 much.
18 Q. Do you want to try to refresh your memory
19 on that?
20 [REDACTED]: Do you have something to
21 refresh her memory with?
22 MR. TEIN: Do you want to stop making

23 speaking objections?
24 [REDACTED]: No. But to refresh someone's
25 memory you show them a document.

34

1 MR. TEIN: I know how to do this.

2 [REDACTED]: Then show her a document.

3 MR. TEIN: Stop speaking.

4 [REDACTED]: I'm not going to stop
5 speaking. I'm going to continue to make the
6 record.

7 MR. TEIN: You're obstructing. Please
8 stop.

9 [REDACTED]: I'm not obstructing. But if
10 you want to refresh her recollection, you need to
11 show her something.

12 That's not a proper question. I object to
13 the foundation and the predicate of that question.

14 MR. TEIN: Are you done?

15 [REDACTED]: I am now. Thank you.

16 BY MR. TEIN:

17 Q. Do you want to try to refresh your memory
18 as to whether you had any conversation with the woman who
19 walked you upstairs in Epstein's house in which you told
20 her that you went to college and had just moved down [REDACTED]
21 [REDACTED]?

22 [REDACTED]: Objection. Object to the
23 form of the question. Lack of foundation and
24 predicate.

25 BY MR. TEIN:

1 Q. You can answer the question.

2 A. Sure.

3 Q. Is there anything that would refresh your
4 memory that in fact you told Mr. Epstein's assistant, the
5 one who walked you upstairs, that you went to college and
6 you had just moved down here [REDACTED]?

7 A. I don't remember saying that, but if you --
8 I don't remember saying that myself, so --

9 Q. That would be a lie, right?

10 A. No. I really don't remember.

11 Q. So you told Jeff that you were 18 years
12 old, correct?

13 A. Yes.

14 Q. Do you remember [REDACTED] of
15 the Police Department, Palm Beach Police Department?

16 A. Yes.

17 Q. Do you remember you spoke to her?

18 A. Yes.

19 Q. Do you remember that you told Detective
20 [REDACTED] that when you lied about your age to Jeff [REDACTED]

[REDACTED]
[REDACTED]?

23 A. I don't remember the words exactly, but I

24 do remember telling her I told him I was 18.

25 Q. And do you remember telling [REDACTED]

1 that when you lied to Epstein about your age that [REDACTED]
[REDACTED]
[REDACTED]?

4 A. No, I don't remember saying those words

5 exactly to her. I remember telling her that I told

6 Epstein I was 18.

7 Q. Does it sound right to you that you told

8 [REDACTED]
[REDACTED]--

10 MS. [REDACTED]: Objection. Asked and
11 answered.

12 BY MR. TEIN:

13 Q. -- [REDACTED]
[REDACTED]?

15 [REDACTED]: Objection. Asked and
16 answered, lack of foundation, mischaracterization
17 of her earlier testimony. She's already answered
18 that question.

19 BY MR. TEIN:

20 Q. You can answer it.

21 [REDACTED]: Same objection. It's been
22 asked and answered.

23 You can answer. I've made the objection.

24 THE WITNESS: I forget the question, now.

25

37

1 BY MR. TEIN:

2 Q. Let me put it again.

3 Does it sound right to you that you told

4 [REDACTED] that when you lied about your age to

5 [REDACTED] Epstein, [REDACTED]
[REDACTED]

7 [REDACTED]: Objection. Lack of

8 foundation, asked and answered.

9 THE WITNESS: I could have possibly said
 10 that, yes.
 11 BY MR. TEIN:
 12 Q. You didn't want Mr. Epstein to know that
 13 you were lying about your age, right?
 14 A. Correct.
 15 Q. You didn't want Mr. Epstein to know that
 16 you were not 18 yet, right?
 17 A. Correct.
 18 Q. You wanted Mr. Epstein to believe that you
 19 really were 18, right?
 20 A. Correct.
 21 Q. Do you remember when Mr. Epstein asked
 22 where you went to school?
 23 A. Yes.
 24 Q. And you told Mr. Epstein you went to
 25 [REDACTED], right?

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1 A. Yes.
 2 Q. Was that the truth?
 3 A. No.
 4 Q. In fact, you went to [REDACTED], right?
 5 A. Yes.
 6 Q. So you lied to Mr. Epstein again, correct?
 7 A. Yes.
 8 Q. Is [REDACTED] the college that you told
 9 Jeff's assistant that you were attending?
 10 A. I don't remember having that conversation
 11 with her, so I wouldn't know if that's what I said.
 12 Q. That was a lie, though, wasn't it?
 13 [REDACTED]: Objection to the form of the
 Page 32

14 question, lack of foundation. You're making an
15 assumption. She just answered you she can't tell
16 you that.

17 MR. TEIN: Speaking objection. And you
18 well know that, [REDACTED].

19 [REDACTED]: She can't answer that
20 question. The way you phrased that question,
21 you're purposely making her not be honest in her
22 testimony. She can't answer a question like that.
23 She doesn't remember. So then you say, "So you
24 were lying." That's improper and you know that.
25 That's not a proper question. And any attorney

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1 that would do that to a witnesses or to a person
2 that's sitting in this chair is not acting
3 professionally. You can't ask a question like
4 that. You can do it, but it's not proper. And
5 I'm sure you weren't trained that way, certainly
6 not ethically.

7 MR. TEIN: Will you stop?

8 [REDACTED]: I'm not going to stop,
9 because the way you're asking that question is
10 improper and you know it.

11 MR. TEIN: You're losing your cool.

12 BY MR. TEIN:

13 Q. Ms. [REDACTED] --

14 [REDACTED]: Trust me. I'm very calm.
15 When I lose my cool, you'll know it.

16 MR. TEIN: I do know it.

17 BY MR. TEIN:

18 Q. Ms. [REDACTED], Mr. Epstein never asked you
19 to do anything other than massage him, correct?
20 A. Incorrect; because he asked me to take off
21 my bra, so that would be two things he's asked me to do.
22 Q. Other than asking you to take your bra off,
23 Mr. Epstein never asked you to do anything with him other
24 than massage, correct?
25 [REDACTED]: Objection. Foundation,

40

1 predicate.
2 THE WITNESS: Correct.
3 BY MR. TEIN:
4 Q. You told the police, in your words, that
5 you did not [REDACTED], right?
6 A. Correct.
7 Q. What does that mean?
8 A. [REDACTED] ?
9 Q. Your term, what does that mean?
10 A. Masturbating.
11 Q. Mr. Epstein never tried at any time to grab
12 your hand, did he?
13 A. No.
14 Q. Mr. Epstein never tried to put your hand
15 anywhere, did he?
16 A. No.
17 Q. At no time did you touch Mr. Epstein's
18 penis, did you?
19 A. No.
20 Q. And he did not touch you, correct?
21 A. Incorrect.
22 Q. Well, you told the police, [REDACTED]

23 [REDACTED] Were you lying to the police then?

24 A. No. Well, I wasn't being fully truthful,
25 but I wasn't lying.

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1 Q. You told the police twice when you spoke to
2 [REDACTED] that [REDACTED] Didn't
3 you say that to the police?

4 A. Yeah.

5 Q. And you're saying that that was not fully
6 truthful. Is that what you're saying now?

7 A. Correct.

8 Q. And you're saying if you're not fully
9 truthful, that's not a lie. Correct?

10 A. You took that out of context like really
11 bad. I didn't mean like that. Touching my legs and --
12 he never kept his hands to himself the entire time.
13 That's what I'm trying to say.

14 Q. You told the police, [REDACTED]
15 [REDACTED] You agree with that, correct?

16 A. No, I don't agree with that, because he did
17 touch me.

18 Q. Did you tell the police that he did not
19 touch you, yes or no?

20 A. It's a possibility, but I do not remember.

21 Q. Okay. And you did not have any type of sex
22 with Jeff, correct?

23 A. No.

24 Q. And you did not have any type of oral sex
25 with Jeff, correct?

1 **A. No.**

2 **Q. No type of intercourse with Jeff, correct?**

3 **A. Correct.**

4 Q. **All right. Let's talk about what happened**
5 **after the massage was over.**

6 A. Okay.

7 Q. **After the massage you told Epstein that you**
8 **wanted to bring ██████████ back so she could make**
9 **some money, correct?**

10 A. **Incorrect.**

11 Q. ██████████, right?

12 A. Correct.

13 Q. And you love ██████ very much, don't you?

14 A. Yes.

15 Q. And when you left the house you were joking
16 **with the other girls, weren't you?**

17 A. **Incorrect.**

18 Q. Well, when ██████ and the other girl in the
19 **car that day made their statements to the police they**
20 **told the police that you were joking afterwards. Are you**
21 **saying that they were lying to the police about that?**

22 A. No. But a question or -- questions from
23 ██████ -- like she asked me questions, but it wasn't
24 **joking. She was kind of like in a happy way, like, "Oh,**
25 **what did you do? What did you do?" Like those kind of**

1 **things, but it wasn't joking about it at all.**

2 Q. You joked about it, didn't you?

3 A. No.

4 Q. You said to ██████ that if you did this

5 every weekend you'd be rich, didn't you?

6 A. No. That's what [REDACTED] told me.

7 Q. You didn't tell that to [REDACTED]?

8 [REDACTED]: Objection. Asked and
9 answered.

10 THE WITNESS: No.

11 BY MR. TEIN:

12 Q. After you left Epstein's house you took the
13 money and you went shopping with [REDACTED] and the other
14 girl in the car, correct?

15 A. Incorrect. I didn't spend any of the
16 money.

17 Q. You went to [REDACTED], didn't you?

18 A. I went along, yes, but I didn't --

19 Q. You went shopping with them at [REDACTED],
20 didn't you?

21 [REDACTED]: Objection.

22 THE WITNESS: I guess you could say that.

23 [REDACTED]: Objection. Lack of predicate
24 and foundation. Mischaracterization of earlier
25 testimony.

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1 BY MR. TEIN:

2 Q. And [REDACTED] bought a purse, right?

3 A. Yes.

4 Q. And you were with her the whole time at
5 [REDACTED], correct?

6 A. Yes.

7 Q. Now tell me about when the federal
8 prosecutors told you about getting reimbursed.

9 A. I have no idea what you're talking about.
10 Q. Tell me about when the federal prosecutors
11 spoke to you about getting money you feel you're entitled
12 to from Mr. Epstein.
13 A. I don't know what you're talking about.
14 Q. Do you know who [REDACTED] is?
15 A. No, sir.
16 Q. Did you ever meet with any federal
17 prosecutors?
18 A. I think -- yeah. I think they were -- I
19 think they were like FBI.
20 Q. Uh-huh. Did you meet with federal
21 prosecutors?
22 A. They came to my house one time, yes.
23 Q. When did they come to your house?
24 A. Very long ago.
25 Q. Was it this year, 2008?

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1 A. It was not this year, no.
2 Q. Was it [REDACTED]
3 A. I'd have to say at least [REDACTED] or a
4 year ago, yeah. So it would be [REDACTED]; but it was a
5 while ago.
6 Q. How many federal prosecutors or FBI agents
7 came to your house?
8 A. I'm trying to remember. I want to say four
9 people came.
10 Q. Did they give you their business cards?
11 A. If they did, I don't remember, and they
12 weren't toward me. Maybe my parents have them. I don't
13 know.

14 Q. Did they give you their cell phone numbers?
15 A. No.
16 Q. Did you ever speak to them on their cell
17 phones?
18 A. No, sir.
19 Q. Did they speak to your parents?
20 A. That's something you'd have to ask my
21 parents.
22 Q. Do you know whether they spoke to your
23 parent's?
24 A. No, sir.
25 Q. You have no idea?

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1 A. No, sir.
2 [REDACTED]: Objection. Asked and
3 answered.
4 BY MR. TEIN:
5 Q. So if I say the name to you [REDACTED]
6 [REDACTED], you don't know who that is?
7 A. No, sir.
8 Q. How many women and how many men came to
9 your house?
10 A. I want to say two ladies and two guys.
11 Q. Did someone named [REDACTED] come to
12 your house?
13 A. I don't know names, sir.
14 Q. Do you know who [REDACTED] is?
15 A. No, sir.
16 Q. Do you know who [REDACTED] is?
17 A. Yes.

18 Q. That's the lawyer who [REDACTED]
[REDACTED]?

20 A. Yes.

21 Q. Has Mr. [REDACTED]
[REDACTED]?

23 [REDACTED]: Any conversations that you've
24 had with Mr. [REDACTED] regarding that issue, you are
25 not to disclose. If you've learned in some other

47

1 fashion, you may answer.

2 THE WITNESS: Okay.

3 I wouldn't know.

4 BY MR. TEIN:

5 Q. You don't know?

6 A. No.

7 [REDACTED]: Objection. Foundation.

8 Attorney/client privilege.

9 BY MR. TEIN:

10 Q. And you say you don't know who [REDACTED]
11 is?

12 A. No, sir.

13 Q. Does it refresh your recollection that he's
14 [REDACTED]?

15 A. No.

16 Q. That he's [REDACTED]?

17 A. No.

18 Q. Does it refresh your memory that he's the
19 [REDACTED]
[REDACTED]
[REDACTED]

22 A. No. I don't know who he is.

23 Q. Without telling me any conversations that
24 you've had with your lawyers, [REDACTED]
25 [REDACTED]

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1 [REDACTED]?

2 A. [REDACTED]

3 Q. [REDACTED]

4 A. [REDACTED]

5 Q. Did you ever meet Mr. [REDACTED]?

6 A. Once.

7 Q. Don't -- don't tell me what you discussed
8 with him. Where did you meet him?

9 A. I was shopping in my -- he showed up at my
10 friend's house.

11 Q. Whose house?

12 A. My friend [REDACTED]

13 Q. Is that [REDACTED] from [REDACTED]
14 [REDACTED]?

15 A. Yes.

16 Q. And did you have a meeting with him at
17 [REDACTED] house?

18 A. Yes. I guess you could say that.

19 Q. And who else was there?

20 A. [REDACTED].

21 Q. And what was that meeting about?

22 [REDACTED]: Objection. That calls for
23 attorney/client privilege.

24 BY MR. TEIN:

25 Q. What discussions did you have with

1 Mr. [REDACTED] in the presence of [REDACTED]?

2 A. None.

3 Q. What discussions did you have in the
4 presence of [REDACTED]?

5 A. Of [REDACTED]?

6 MR. GOLDBERGER: It's the [REDACTED].

7 BY MR. TEIN:

8 Q. Oh, of [REDACTED].

9 A. The only one that we've ever discussed or
10 ever had.

11 Q. And so you were in a conversation with
12 Mr. [REDACTED]?

13 A. Yes, sir.

14 Q. And you discussed privileged matters during
15 that conversation?

16 [REDACTED]: Object to the form. I think
17 you might have to educate her on that question.

18 BY MR. TEIN:

19 Q. [REDACTED]

20 A. Yes.

21 Q. Did [REDACTED] tell you about any
22 conversations that she had with Mr. [REDACTED]?

23 A. As far as I'm concerned, she's never spoken
24 or she's never had a conversation. She only opened the
25 door and then left. She's the one who answered the door.

1 Q. Why did the meeting take place at [REDACTED]
2 [REDACTED] house?

3 A. I spent the night that night at her house.

4 Q. And when was this?

5 A. A while ago.
6 Q. How long ago?
7 A. [REDACTED] I'm guessing.
8 Q. [REDACTED]?
9 A. Uh-huh.
10 Q. [REDACTED]
[REDACTED]
12 [REDACTED]
13 Q. Did you meet what an FBI agent named [REDACTED]
14 [REDACTED], a woman?
15 A. I don't know.
16 Q. Did Ms. [REDACTED] speak to you about
17 getting reimbursed from Mr. Epstein?
18 A. I've never had a discussion with anyone
19 about getting reimbursed from Mr. Epstein.
20 Q. Have you met with an agent named [REDACTED]
21 [REDACTED]?
22 A. Not to my knowledge.
23 Q. How about an agent named [REDACTED]?
24 A. No, sir.
25 Q. How about an agent named [REDACTED]?

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1 A. No.
2 Q. And we've learned that many of the girls,
3 some of whom are as old as 23, were told by the
4 government that they would get money at the end of the
5 criminal prosecution. Does that sound familiar to you?
6 A. No, sir.
7 Q. Other than [REDACTED] here -- I'm not
8 asking about Mr. [REDACTED] either --

9 A. Uh-huh.
10 Q. -- did anyone ever discuss with you that
11 you could get reimbursement for your damages?

12 A. No, sir.

13 Q. Did you or any member --
14 [REDACTED]: Are you referring to a
15 criminal matter or a civil matter?

16 BY MR. TEIN:

17 Q. Did you or any member --
18 [REDACTED]: Excuse me. Let me object to
19 the form of the question.

20 BY MR. TEIN:

21 Q. Did you or any member of your family ever
22 get a victim notification letter from anyone?

23 A. I no longer live [REDACTED] and I
24 wouldn't know.

25 Q. So your testimony is that you have never

52

1 received a victim notification letter, correct?

2 A. Correct.

3 Q. And your testimony is that you don't know
4 if your parents have ever received a victim notification
5 letter, correct?

6 A. Correct.

7 Q. Have you given any evidence to prosecutors
8 or law enforcement in this case?

9 A. What do you mean by evidence?

10 Q. Well. Anything that you can touch or feel?

11 A. No.

12 [REDACTED]: Objection to the form of the
13 question.

14 BY MR. TEIN:

15 Q. So you haven't given anything physical --

16 A. No.

17 Q. -- any item to any prosecutor, police
18 officer or law enforcement agent, correct?

19 A. My cell phone [REDACTED]
[REDACTED], but that's it.

21 Q. You gave your cell phone to whom?

22 A. [REDACTED].

23 Q. Did she keep it?

24 A. Ask her.

25 Q. You gave it to her and then you didn't get

53

1 it back at the end of the meeting?

2 A. No. They -- yeah. No. They have it. I'm
3 guessing. I don't have it.

4 Q. [REDACTED]
[REDACTED]

6 [REDACTED]: Objection to the form of the
7 question. Attorney/client privilege.

8 BY MR. TEIN:

9 Q. [REDACTED]
[REDACTED]

11 [REDACTED]: Same. Same objection,
12 attorney/client privilege.

13 Don't answer the question.

14 BY MR. TEIN:

15 Q. I'm not asking about what your lawyer told
16 you.

17 [REDACTED]: I'm instructing her not to

18 answer the question, because any of those
19 conversations involve her counsel.

20 MR. TEIN: Certify that.

21 [REDACTED]: Please.

22CERTIFIED QUESTION.....

23 BY MR. TEIN:

24 Q. Now, [REDACTED], you lied to get out of this
25 deposition, didn't you?

54

1 A. No, sir.

2 Q. You didn't want to come to court today and
3 tell the story that you had told to the police under
4 oath, did you?

5 [REDACTED]: Object to the form of the
6 question. Lack of foundation, predicate.

7 THE WITNESS: No. I have no problem coming
8 here and talking to you.

9 BY MR. TEIN:

10 Q. And to avoid getting served with a lawful
11 subpoena, you lied about your name, didn't you?

12 A. No.

13 Q. And in fact, just lying yourself wasn't
14 enough, was it?

15 [REDACTED]: Objects to the form of the
16 question.

17 Don't answer it. It's not a question.

18 Object to the form of the question. Lack
19 of foundation.

20 MR. TEIN: Are you instructing her not to
21 answer?

22 [REDACTED]: I am.
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23 MR. TEIN: **Certify it.**
24 [REDACTED]: **Please.**
25

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1CERTIFIED QUESTION.....

2 BY MR. TEIN:

3 Q. You asked your co-workers --

4 [REDACTED]: **It's vague and ambiguous.**

5 BY MR. TEIN:

6 Q. You asked [REDACTED]
[REDACTED] **to lie for you, didn't you?**

8 A. No. **I informed my boss about what was**
9 **going on and he told me that he would help in any way**
10 **that he can.**

11 Q. Okay. You got your friend [REDACTED] **to lie**
12 **by switching name tags with you, correct?**

13 A. **Incorrect. It was a coincidence that same**
14 **night she was not wearing her name tag; she was wearing**
15 **mine. But I was also not wearing -- I was wearing my**
16 **name tag. Everyone switches name tags. It just so**
17 **happens it was a coincidence that same night the people**
18 **came with the papers.**

19 MR. TEIN: **Will you put up Exhibit 18-001?**

20 MR. GOLDBERGER: **And mark 18-001 for**
21 **identification purposes to this deposition.**

22 [REDACTED]: **None of them have been marked**
23 **yet. Can we mark them and put them as attachment**
24 **to the depositions? Because I think you've shown**
25 **three photos now. And this is the only one that**

1 has been marked for identification yet.

2 BY MR. TEIN:

3 Q. [REDACTED] --

4 [REDACTED]: Hold on just a second. Just
5 so the record is clear --

6 MR. TEIN: I'm not speaking to you.

7 [REDACTED]: Okay. Then don't speak to me
8 then. But I'll speak to Mr. Goldberger, perhaps.

9 But at least for the record, can we put on
10 the record what the previous two photographs were
11 marked for identification?

12 MR. GOLDBERGER: We will make sure that the
13 record is clear at the end of the deposition so
14 that there's no ambiguity.

15 [REDACTED]: Thank you.

16 BY MR. TEIN:

17 Q. [REDACTED], I've put a photograph marked 18-001
18 up on the screen. Do you see that?

19 A. Yup.

20 Q. Who is that in the photo?

21 A. [REDACTED] on the left and me on the right.

22 Q. [REDACTED], right?

23 A. Yes.

24 Q. [REDACTED], your friend at the
25 [REDACTED], right?

1 A. Yes.

2 Q. [REDACTED], your friend, who you say the day
3 that the process servers went to serve you with a
4 subpoena for this deposition, just happened -- just by

5 coincidence, was wearing your name tag?

6 A. Yes, sir.

7 Q. And just by coincidence, you were wearing
8 her name tag, correct?

9 A. Yes.

10 Q. Your testimony under oath is that's just a
11 coincidence, right?

12 A. Total honesty.

13 Q. It just happens to be the day that you were
14 going to be served with a subpoena, correct?

15 A. That wasn't the first day that --

16 [REDACTED]: [REDACTED], just answer the
17 question. It calls for a yes or no.

18 THE WITNESS: Yes.

19 BY MR. TEIN:

20 Q. You said that wasn't the first day you were
21 going to be -- you thought you were being served with a
22 subpoena, correct?

23 A. Correct.

24 Q. You knew before the day that you switched
25 name tags with [REDACTED] that the process servers were

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1 looking for you, didn't you?

2 A. No. I knew --

3 [REDACTED]: Just answer it. It calls for
4 a yes or no.

5 THE WITNESS: Okay. No.

6 BY MR. TEIN:

7 Q. Now you can explain the answer that your
8 counsel stopped you from explaining.

9 A. Okay. I work at [REDACTED] and people
10 were telling me that people were looking for me. So yes,
11 I was aware that people were searching for me, but I had
12 no idea who they were or what their intentions were, but
13 I thought they were just people I didn't want to talk to.
14 So I just didn't want to talk to them. And every time
15 they'd come to work I wasn't there. And so happens the
16 night that they came in me and my friend switched name
17 tags. No big deal.

18 Q. That's a lie, isn't it?
19 [REDACTED]: Objection. Don't answer that
20 question. That's harassment and I will not allow
21 it. He could ask the questions and we'll allow a
22 jury to make that determination, but not counsel.
23 I will not allow her to answer that
24 question.

25 MR. TEIN: Certify it.

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1 [REDACTED]: I'll certify it.
2CERTIFIED QUESTION.....

3 She's answered that question. She's explained it five
4 times already. The fact that Counsel doesn't like the
5 answer, that's a different query.

6 MR. TEIN: Stop making speaking objections.

7 [REDACTED]: I'm not. I'm not going to
8 put up with it, because it's inappropriate, Jack,
9 and you know it. I will not allow Counsel to
10 berate a witness, whether it's in a criminal case
11 or a civil case, whether my client or --

12 MR. TEIN: Calm down.

13 [REDACTED]: Excuse me.
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14 No, I'm not going to allow it. That is not
15 proper.

16 MR. GOLDBERGER: Okay.

17 [REDACTED]: If he wants to say that she's
18 lying after asking it five times and her
19 explaining in great detail, he can do that. But
20 I'm not going to allow her to answer, nor be
21 harassed by him. It's improper.

22 MR. GOLDBERGER: Okay. But your response
23 that Counsel doesn't like the question -- or
24 doesn't like the answer -- just let me finish.

25 [REDACTED]: Absolutely. I wasn't going

60

1 to interrupt you.

2 MR. GOLDBERGER: Just requires us to say we
3 like the answer to that question. And it's not
4 you and I or you and Mr. Tein who are testifying
5 here. It's the witness.

6 [REDACTED]: Fine. But after the sixth
7 time of asking the same question and then coming
8 back and pointing a finger at her and saying,
9 you're a liar --

10 MR. TEIN: That didn't happen.

11 [REDACTED]: That's fine. But I'm not
12 going to allow her to answer that question because
13 she's answered that same question and has
14 explained it.

15 Now Counsel might be sitting there rubbing
16 his head with a migraine. That's his problem.
17 But if he can't ask a question appropriately in a

18 professional manner, we will leave. I will not
19 allow her to be berated like that.

20 MR. GOLDBERGER: Actually, we're very happy
21 with the answer.

22 [REDACTED]: That's great.

23 MR. GOLDBERGER: Do you want us to get into
24 that?

25 MR. TEIN: [REDACTED] --

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1 [REDACTED]: This is really big stuff that
2 you're going through, but that's fine; just ask
3 your question and move on. But do it one time.
4 If you don't understand it, I'll let you follow
5 up, but I'm not going to allow you to ask the same
6 question the time and again and then call her a
7 liar. Just ask the question, get the answer and
8 move to the next subject matter.

9 MR. TEIN: [REDACTED], I'm sitting right across
10 the table from you.

11 [REDACTED]: Yes, sir.

12 MR. TEIN: Please be quiet. Don't yell.

13 [REDACTED]: I will not be quiet.

14 MR. TEIN: Stop yelling.

15 [REDACTED]: Lewis, when I'm yelling
16 you'll know it. I will not --

17 MR. TEIN: My name is not Lewis.

18 [REDACTED]: I thought your first name was
19 Lewis, Mr. Tein.

20 MR. TEIN: You watched me for three days at
21 the evidentiary hearing where you sat in the back
22 of the courtroom. You should know who I am.

23 ██████████: Well, that's the impression
24 you must have made in the courtroom.
25 I will not be quiet.

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1 MR. TEIN: That's obnoxious. Stop being
2 obnoxious. It's stupid. Let's go ahead with the
3 questions.

4 ██████████: I will make the record.

5 MR. TEIN: Let's get on with the questions.

6 ██████████: Do you need a break?

7 (Thereupon, a recess was taken.)

8 BY MR. TEIN:

9 Q. Okay. ██████████, after you told your manager
10 at ██████████ everything that was going on
11 and he told you he would help you any way he could, he
12 hid you in the kitchen from the process servers, correct?

13 A. Incorrect.

14 Q. Isn't it true that lying to avoid service
15 is a meaningless lie to you, ██████████?

16 A. Incorrect.

17 Q. What is your manager's name?

18 A. I have ██████████. Would you like to know

19 all --

20 Q. Who's the one who lied for you?

21 A. ██████████.

22 Q. And what did ██████████ do to lie for you?

23 A. Said I wasn't there.

24 Q. And who did he tell wasn't there?

25 A. Ask him.

1 Q. Where were you when [REDACTED] told this
2 someone that you were not at [REDACTED]?

3 A. [REDACTED]

4 Q. At [REDACTED]?

5 A. Yes.

6 Q. What did you do so that [REDACTED] would lie to
7 the process servers for you?

8 A. Nothing.

9 Q. You just got him to lie for you, didn't
10 you?

11 A. No. I had no influence on him saying I
12 wasn't there.

13 Q. He took that upon himself?

14 Isn't it true that Mr. Epstein's process
15 servers had to ask the police to get you out of the
16 [REDACTED] so that they could serve you?

17 [REDACTED]: Objection. Lack of
18 foundation, predicate.

19 BY MR. TEIN:

20 Q. You can answer the question.

21 [REDACTED]: If you know. Don't guess.

22 THE WITNESS: No. Can you repeat the
23 question?

24 MR. TEIN: Don't coach.

25 [REDACTED]: Don't guess.

1 MR. TEIN: That's a coaching.

2 [REDACTED]: No. That's an instruction to
3 the client.

4 MR. TEIN: No. You don't do that.
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5 THE WITNESS: Can you repeat the question?

6 [REDACTED]: Let me just state for the

7 record --

8 BY MR. TEIN:

9 Q. Once the police -- isn't it true that
10 Mr. Epstein's process servers had to ask the police to get
11 you out of the [REDACTED] so that they could serve you?

12 A. Incorrect. My boss called the police.

13 Q. And once the police showed up, to stop you
14 from lying to avoid service, you made up another lie that
15 the process servers had harassed you. Isn't that
16 correct?

17 A. Incorrect.

18 Q. You lie all the time, don't you?

19 [REDACTED]: Objection.

20 THE WITNESS: Incorrect.

21 BY MR. TEIN:

22 Q. You have a MySpace page, don't you?

23 A. No longer do I have a MySpace page. I
24 deleted it.

25 Q. When did you delete your MySpace page?

65

1 A. [REDACTED].

2 Q. Who told you to take your MySpace page down
3 [REDACTED]?

4 A. Nobody. I'm sick and tired of MySpace.

5 Q. You all of a sudden got sick and tired of
6 MySpace and just [REDACTED] before this deposition you
7 decided to delete your MySpace page, correct?

8 A. Correct.

9 Q. Is that your testimony under oath?
10 A. Yes.
11 Q. Did you take your MySpace page down because
12 you thought the government might subpoena it?
13 A. Incorrect.
14 Q. Hadn't your MySpace page been up for over
15 [REDACTED] months before you took it down?
16 A. Correct. But I also had made tons of
17 MySpaces over the last years. I just get tired of them
18 and delete them because drama and make new ones.
19 Q. We're going to talk about that.
20 So you deleted your MySpace page after you
21 were already under subpoena for this deposition, correct?
22 A. Correct.
23 Q. What about the MySpace page didn't you want
24 us to see, [REDACTED]?
25 A. Nothing.

66

1 Q. Well, we're going to come back to MySpace
2 in a second.
3 A. You do that.
4 Q. [REDACTED], I'm going to ask you some questions
5 about why you lie about your age so often, okay?
6 [REDACTED]: Objection to the form.
7 Argumentative.
8 BY MR. TEIN:
9 Q. You lie about your age all the time, don't
10 you?
11 [REDACTED]: Objection, argumentative.
12 THE WITNESS: Incorrect.
13 BY MR. TEIN:

14 Q. You **lie** about your age to get body
15 **piercings**, don't you?
16 A. **Incorrect.**
17 Q. You have body **piercings**, don't you?
18 A. **Yes.**
19 Q. You have [REDACTED] body **piercings**; **isn't** that
20 **right**?
21 A. [REDACTED]
22 Q. **Other than the pierceings** on your ears --
23 **I'm not talking about that** --
24 A. **Oh, then no;** [REDACTED]
25 Q. [REDACTED]

67

1 A. [REDACTED]
2 Q. **When did you get that?**
3 A. [REDACTED]
[REDACTED]
5 Q. **And when was that?**
6 A. **When I was** [REDACTED]
7 Q. **Okay. So you had that body piercing** when
8 **you met Epstein, correct?**
9 A. **It might have been, or maybe that** -- yeah,
10 **either my** [REDACTED] **I honestly don't**
11 **remember.**
12 Q. **Now you've lied about your age to get into**
13 **bars by using driver's licenses that aren't yours,**
14 **correct?**
15 A. **Incorrect.**
16 Q. **Are you swearing under oath that you've**
17 **never done that?**

18 A. Yes, I swear under oath.
19 Q. And you've lied about your age to buy beer,
20 correct?
21 A. Incorrect.
22 Q. You're swearing under oath that you've
23 never lied to stores about your age?
24 A. I've never lied to a store about my age or
25 anything.

68

1 Q. You try to look much older than you are,
2 don't you?
3 A. Incorrect.
4 Q. And you've lied about your age on your
5 MySpace pages, don't you?
6 A. Incorrect.
7 Q. All right. Let's look at Exhibit 26-01
8 one.
9 MS. [REDACTED]: 26-001?
10 MR. TEIN: Yes.

11 BY MR. TEIN:

12 Q. On this page you lied to everyone that you
13 were 18, didn't you?

14 A. Correct.

15 Q. Let's go to Exhibit 33.

16 MS. [REDACTED]: That's 33-001?

17 TEIN: Correct.

18 BY MR. TEIN:

19 Q. On this page you lied to everyone that you
20 were 19, didn't you?

21 A. Incorrect.

22 [REDACTED]: Just answer the question.
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23 THE WITNESS: Oh, **incorrect.**

24 BY MR. TEIN:

25 Q. Now you can **explain** your answer.

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1 A. I know **that I** have seen **all of these** and I
2 know **that this** one is mine.

3 Can you go down?

4 [REDACTED]: Just for the record, you're
5 **pointing to the photo.**

6 THE WITNESS: I'm **pointing to --**

7 BY MR. TEIN:

8 Q. **You're pointing to the one where it says**
9 **you're age is 18?**

10 A. **Correct.**

11 Q. That's yours, **right?**

12 A. **Correct.** That's mine **from a couple years**
13 ago **that I** have not been on base I don't use **that.**
14 Please keep going down, please. And I think **that's it,**
15 because there's no one -- **just that one is mine.**

16 Q. **So the one you pointed to where it says**
17 **your age is 18, that's yours, correct?**

18 A. **Correct.**

19 Q. And when you wrote 18 as your age on your
20 MySpace page, **that was a lie, wouldn't it?**

21 A. **Correct.**

22 Q. Did you **lie** about your MySpace page back
23 **then** because you couldn't post on MySpace **unless** you were
24 18?

25 A. **Correct.** There was a **rule** many years ago

1 that you had to be 18 to have a MySpace.

2 Q. So you lied about your age so you could
3 post on MySpace, right?

4 A. Yes.

5 Q. Let's go back to the top one on this page,
6 33-01.

7 Are you testifying now under oath that this
8 MySpace page where the headline says, "[REDACTED]
[REDACTED]," and the location is given as [REDACTED]
[REDACTED], and the age is [REDACTED], and it says [REDACTED],

11 [REDACTED], is it your testimony that you did not post
12 that?

13 A. Correct.

14 Q. Now let's go back to the one that you were
15 pointing to before on this page, where it says your age
16 is [REDACTED] and you lied about your age to post MySpace, okay?

17 A. Uh-huh, yes.

18 Q. All right. Why did you finally put your
19 true age on your MySpace profile [REDACTED] before you
20 were scheduled to testify before the Grand Jury?

21 A. I don't know what you're talking about.

22 [REDACTED]: If you don't understand, ask
23 him to ask the question again.

24 MR. TEIN: Don't coach.

25 THE WITNESS: I don't know which MySpace

1 you're talking about.

2 BY MR. TEIN:

3 Q. The MySpace page that you're just pointing
4 to, where it says you were [REDACTED]

5 A. Yes.

6 Q. And you were lying about your age, right?

7 A. Uh-huh.

8 Q. Why did you finally post your true age on
9 your MySpace profile --

10 A. Uh --

11 Q. -- [REDACTED] before you were scheduled to
12 testify before the Grand Jury?

13 A. I honestly don't know which MySpace,
14 because I've had like a bazillion MySpaces and in that
15 year, I had [REDACTED]
[REDACTED]. So I don't know which one you're referring
17 to.

18 Q. You remember that you changed your age on
19 your MySpace page from [REDACTED] just [REDACTED]
20 before you went and testified in the Grand Jury?

21 A. No.

22 Q. You don't remember that.

23 A. No.

24 Q. Do you remember Detective [REDACTED]? Did you
25 ever meet a Detective [REDACTED]?

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1 A. I don't know the names.

2 Q. How many different detectives have you met
3 with on this case from Palm Beach?

4 A. Probably a good six or seven, maybe.

5 Q. Did one of the detectives tell you before
6 you testified in the Grand Jury that you should take your
7 MySpace age and put your true age?

8 A. No.

9 Q. Didn't Detective [REDACTED] have to come to
10 your house to pick you up to get you to testify in front
11 of the Grand Jury?

12 A. Possibly, maybe because I didn't have a
13 ride. I was only [REDACTED] at the time.

14 Q. [REDACTED] didn't drive you?

15 A. No.

16 Q. [REDACTED] didn't drive you?

17 A. I think [REDACTED]. Oh, [REDACTED] drove
18 me.

19 Q. [REDACTED] drove you?

20 A. Yes, sir.

21 Q. So your testimony is Detective [REDACTED] did
22 not drive you, correct?

23 [REDACTED]: Objection /asked and
24 answered.

25 THE WITNESS: No. I'm pretty sure [REDACTED]

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1 drove me because he was there with me.

2 BY MR. TEIN:

3 Q. Did any detective tell you to change your
4 age on your MySpace page to put your true age?

5 A. No, sir.

6 Q. Now you also lied on your MySpace page
7 about your income, didn't you?

8 A. Yes.

9 Q. And you lied, saying that you made a
10 [REDACTED], correct?

11 A. As a joke, yes.

12 Q. That was a lie, wasn't it?

13 A. Yes.

14 Q. And you also lied on your MySpace page,
15 saying that you were married, didn't you?

16 A. Possibly. And that might have been an
17 error on my part.

18 Q. Now you also lie to the police, don't you?

19 A. No.

20 Q. Well, you lied to the police in your
21 tape-recorded statement that you gave to Detective
22 [REDACTED], didn't you?

23 A. To my knowledge, no, I did not.

24 Q. Well, you lied to the police when you
25 accused Mr. Epstein of attempting to murder your father,

74

1 didn't you?

2 A. No. I never heard a statement saying that
3 Mr. Epstein tried to murder my father.

4 Q. You made that statement, didn't you?

5 [REDACTED]: Do you have a statement to
6 show her? That's been asked and answered.

7 MR. TEIN: I'm sorry. I didn't hear the
8 witness' answer, [REDACTED].

9 BY MR. TEIN:

10 Q. [REDACTED], you told the police, didn't you,
11 that Mr. Epstein almost killed your father, didn't you?

12 A. No.

13 Q. [REDACTED] before Mr. Epstein even
14 knew about this investigation, you told the police that
15 Epstein had "already come to my dad's house and did
16 something to my dad's [REDACTED] and my dad almost died. I
17 didn't want my dad to get hurt, because Jeff already

18 almost killed him."

19 Didn't you say that?

20 A. Not to my knowledge or recollection. I
21 have never said anything like that.

22 Q. That would have been a complete lie,
23 wouldn't it have been?

24 A. Yeah.

25 Q. Because Mr. Epstein never came to your

75

1 dad's house, correct?

2 A. Correct.

3 Q. And no one who worked for Mr. Epstein ever
4 did something to your dad's [REDACTED]. Did they?

5 [REDACTED]: Objection. Lack of
6 foundation, predicate.

7 Don't guess.

8 BY MR. TEIN:

9 Q. It's not true that Mr. Epstein almost
10 killed your father, is it?

11 [REDACTED]: Objection. Asked and
12 answered, lack of foundation, predicate.

13 BY MR. TEIN:

14 Q. You can answer.

15 A. No.

16 Q. Now you told the police that you didn't
17 know who was in the car with you and [REDACTED] on the day
18 you went to Epstein's house, didn't you?

19 A. Yes.

20 Q. And that was a lie, wasn't it?

21 A. It's the truth.

22 Q. You told the police that there was someone

23 in the car next to you and you specifically said you
24 didn't know her name, right?

25 A. Correct. I do not know her name.

76

1 Q. You said, "I don't know her name, but she
2 was dark like a Spanish girl." Those were your words,
3 right?

4 A. Yes.

5 [REDACTED]: Objection. Asked and
6 answered.

7 BY MR. TEIN:

8 Q. Who was in the car that day with you and
9 [REDACTED]?

10 A. Again, I do not know.

11 Q. It was your good friend [REDACTED],
12 wasn't it?

13 A. No. I don't know a [REDACTED].

14 Q. You lied to the police about who was in the
15 car with you and [REDACTED], didn't you?

16 A. Incorrect.

17 Q. Let me ask you some questions about who you
18 may have spoken to about this case. All right?

19 A. Go ahead.

20 Q. Did you speak to [REDACTED]?

21 A. Not in detail, but of course she knows;
22 she's family and yes.

23 Q. What's her e-mail?

24 A. I don't think she has an e-mail.

25 Q. What is her phone number?

1 A. Oh, gosh. I don't know off the top of my
2 head.
3 Q. And what is her home address?
4 A. She lives [REDACTED].
5 Q. In [REDACTED]?
6 A. Yes, sir.
7 Q. What about [REDACTED] [REDACTED]? Did
8 you speak to him about Epstein's case?
9 A. That's my [REDACTED]. My sister
10 doesn't have [REDACTED]. My [REDACTED]
[REDACTED], so maybe you get them confused.
12 Q. Do you know his phone number?
13 A. No.
14 Q. Where does he live?
15 A. [REDACTED].
16 Q. In the same house with her?
17 A. Yes. They're married.
18 Q. So not boy friend; husband?
19 A. Yeah, husband.
20 Q. Have you spoken to [REDACTED] about
21 what happened in Mr. Epstein's house?
22 A. Not in detail, but he knows the basics,
23 yes.
24 Q. What is his e-mail?
25 A. I don't know.

1 Q. What is his phone number?
2 A. How is that relevant?
3 Q. What is his phone number?
4 A. [REDACTED].

5 Q. What is his home address?
6 A. I don't know.
7 Q. Where does he live?
8 A. In [REDACTED] somewhere.
9 Q. Ever been to his house?
10 A. Yes.
11 Q. You don't know what his address is?
12 [REDACTED]: Objection. Asked and
13 answered. She just said she doesn't know.
14 MR. TEIN: Don't coach.
15 [REDACTED]: Objection. Asked and
16 answered.
17 BY MR. TEIN:
18 Q. You can answer the question.
19 A. I don't know the exact address.
20 Q. What street is it on?
21 A. It's an apartment complex; its not a
22 street.
23 Q. What's the name of the apartment complex?
24 A. [REDACTED].
25 Q. What apartment number is it?

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1 A. I couldn't tell you.
2 Q. When was the last time you went there?
3 A. Just visited [REDACTED]. That's the
4 [REDACTED] I went there.
5 Q. How about [REDACTED]? Have you spoken
6 to him about your case?
7 A. No. We no longer speak.
8 Q. What's his phone number? Actually, we

9 already have his phone number room and e-mail.
10 How about [REDACTED]? Have you ever
11 spoken to her about your case?
12 A. I don't know an [REDACTED].
13 Q. Have you ever met [REDACTED]?
14 A. No. But just to let you know, I don't
15 really know names. If you have pictures, of there faces
16 I could tell you.
17 Q. All right. Let me see if I can refresh
18 your memory.
19 A. Okay.
20 Q. Does it refresh your memory that [REDACTED]
21 is the other girl who made allegations about Epstein, but
22 [REDACTED]
23 [REDACTED]
24 A. No, sir. I have no knowledge of any other
25 girls in this whole situation. We're not allowed to know

80

1 each other.
2 Q. I didn't get the last four words.
3 A. We're not allowed to know each other.
4 Q. And what about [REDACTED]? Have you
5 of met her?
6 A. No, sir.
7 Q. Let's see if I can refresh your memory on
8 her. She's the other person [REDACTED]
[REDACTED]
[REDACTED]
11 A. I have no knowledge of her.
12 Q. Never met her?
13 A. Never met her.

14 Q. [REDACTED]?

15 A. I don't know who that is either.

16 Q. A person named [REDACTED] who knows [REDACTED]?

17 Is that [REDACTED]?

18 A. I don't know, sir.

19 Q. Do you remember making a statement to

20 [REDACTED] that's in the police reports?

21 A. No.

22 Q. Have you read the police reports in this

23 case?

24 A. Yes.

25 Q. [REDACTED]?

81

1 A. [REDACTED].

2 Q. [REDACTED]

[REDACTED]

[REDACTED]

5 A. Yes.

6 Q. You didn't want to see that happen, right?

7 A. No.

8 Q. So you're saying you don't know a [REDACTED]

9 [REDACTED]?

10 [REDACTED]: Objection. Asked and

11 answered.

12 BY MR. TEIN:

13 Q. Does it refresh your memory that he was

14 somebody who had gone to jail for [REDACTED]?

15 A. No, sir.

16 Q. Someone who knows [REDACTED]?

17 A. No.

18 Q. You don't know if he met with Detective
19 [REDACTED]?
20 A. No, sir.
21 Q. How about [REDACTED]?
22 A. Yes, I remember. I know who that is.
23 Q. Did you ever speak to [REDACTED] about what
24 happened at Mr. Epstein's house?
25 A. He knows what happened [REDACTED]. He

82

1 doesn't know this is still going on today.
2 Q. What's his address? I'm sorry. I have his
3 address.
4 A. I don't know.
5 Q. How about [REDACTED]?
6 A. [REDACTED]?
7 Q. You know who that is?
8 A. I know who that is, yes.
9 Q. He's the one you [REDACTED]
[REDACTED]
[REDACTED]?
12 A. No, sir.
13 Q. Remember the [REDACTED] you were
14 supposed to go to?
15 A. No, sir.
16 Q. Did you speak to [REDACTED] about this
17 case?
18 A. No, sir.
19 Q. How about [REDACTED]?
20 A. That's my [REDACTED]
21 Q. [REDACTED]
[REDACTED]?

23 A. Ask him. I would not know that
24 information.

25 Q. Did you speak to [REDACTED] about this

83

1 case?

2 A. No, sir.

3 Q. Have you spoken to [REDACTED] about this
4 case?

5 A. No. I don't know who [REDACTED] is.

6 Q. Did your parents speak to [REDACTED]?

7 A. Ask my parents.

8 Q. Let's see if I can refresh your memory as
9 to who he is. Okay?

10 A. Uh-huh.

11 Q. He's the [REDACTED]
[REDACTED].

13 A. I am aware of that. And again, I was not
14 aware like that [REDACTED]
[REDACTED]
[REDACTED]

17 Q. Tell me what you know about [REDACTED]
[REDACTED]
[REDACTED]

20 A. I don't know about the details at all.

21 Q. How much money did [REDACTED]
[REDACTED]?

23 A. I don't even know [REDACTED].

24 Q. I'm sorry?

25 A. I didn't even know [REDACTED]

1 Q. What do you know about the [REDACTED]
[REDACTED]?

3 A. I only know [REDACTED]
[REDACTED]. I don't know anything else.

5 Q. When was that?

6 A. This was a while ago, [REDACTED]
[REDACTED]. I honestly don't know.

8 Q. Did [REDACTED]
[REDACTED]?

10 A. I don't know.

11 Q. Did [REDACTED]
[REDACTED]?

13 A. No, sir.

14 Q. Did he offer you any money?

15 A. No, sir. Never spoke to him.

16 Q. What reporters have you spoken to?

17 A. Zero.

18 Q. What about your family members? What
19 reporters have they spoken to?

20 A. [REDACTED]
[REDACTED].

22 Q. Tell me -- let's go through each one that
23 you remember. [REDACTED]

[REDACTED] what other reporters have any member of your
25 family spoken to?

1 A. I don't know. And I know my [REDACTED]
[REDACTED]

[REDACTED] You'd have to ask them. I
4 don't contact them.

5 Q. Well, I just want to know -- I don't want
6 you to -- I want to know what's in your mind? All right?

7 [REDACTED]: She just told you. She just
8 answered --

9 MR. TEIN: Be quiet.

10 BY MR. TEIN:

11 Q. What I want to know is what you know from
12 your personal knowledge. My opinion question to you is:
13 What knowledge do you have about family members of yours
14 speaking to reporters?

15 [REDACTED]: Objection. Asked and
16 answered.

17 And if you can't talk professionally, we're
18 going to leave.

19 MR. TEIN: Do what you want to do.

20 [REDACTED]: Are you going to continue to
21 talk this way?

22 MR. TEIN: I'm not going to answer any
23 question that you ask me, [REDACTED].

24 [REDACTED]: Okay.

25 MR. TEIN: But you are misrepresenting the

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1 record and you are grandstanding for your client
2 and it's wrong. So be quiet. And you know how to
3 make an objection. Make it. Otherwise stop
4 talking.

5 BY MR. TEIN:

6 Q. [REDACTED] --

7 [REDACTED]: Excuse me.

8 MR. TEIN: If you want to leave the

9 deposition, leave. But you'll be back here.
10 [REDACTED]: Excuse me. If I could just
11 make the record, instead of interrupting me,
12 please, that's what we do professionally. There's
13 a recorder here. I'm certainly not being
14 obstructionist. I'm going to make the record.
15 But we're going to act with some semblance of
16 professionalism, hopefully, by all parties in the
17 room. That goes to me, that goes to your
18 co-counsel sitting behind you and next to you, the
19 court reporter and everyone else in the room.
20 Everyone goes entitled to that.

21 You've asked a question. She answered the
22 question fully and she's not going to be harassed
23 because you don't like the answer. If you want to
24 follow up --

25 MR. TEIN: Stop engaging me. Make your

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1 speech and then we'll ask the questions.

2 [REDACTED]: Well, you won't let me finish
3 making the objection, so it's difficult to do
4 that. But if you want to follow with an
5 appropriate question, feel free to do that. But
6 we're not going to harass the witness.

7 MR. TEIN: I disagree with everything
8 you've said. Let's ask the questions. Okay?

9 [REDACTED]: Ask an appropriate question.

10 MR. TEIN: Are you going to stop talking?

11 [REDACTED]: I'm going to make -- protect
12 my client and make appropriate objection, but
13 there's not a question pending right now.

14 BY MR. TEIN:

15 Q. [REDACTED], has [REDACTED] spoken to any reporters?

16 A. No.

17 [REDACTED]: **Objection.** Asked and
18 answered.

19 BY MR. TEIN:

20 Q. Has [REDACTED] been given money by any
21 reporters?

22 A. No.

23 Q. Has [REDACTED] spoken to any reporters?

24 [REDACTED]: **Objection.** Asked and
25 answered.

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1 THE WITNESS: No.

2 BY MR. TEIN:

3 Q. Has [REDACTED] [REDACTED] spoken to any
4 reporters?

5 A. No.

6 Q. Has [REDACTED] [REDACTED] received any
7 money from reporters?

8 A. No.

9 Q. Are you sure you don't know [REDACTED]?

10 [REDACTED]: **Objection.** Asked and
11 answered.

12 THE WITNESS: I'm positive.

13 BY MR. TEIN:

14 Q. I'll try again to refresh your memory.

15 A. Okay.

16 Q. Does it refresh your memory that [REDACTED]
[REDACTED]

18 [REDACTED]
19 [REDACTED]?
20 A. No. I don't know who she is.
21 Q. Have you spoken to anyone else who's been
22 at Epstein's house?
23 A. No.
24 Q. Without telling me what was said -- I don't
25 want to know about any conversations with any lawyers,

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1 okay --
2 A. Uh-huh.
3 Q. -- did you or your parents speak to any
4 other law firms besides [REDACTED] law
5 firms?
6 A. No.
7 Q. Now without telling me about anything that
8 was said, what -- did one just come to mind?
9 A. No. I was thinking about something else.
10 Q. What were you thinking about?
11 A. Does family court matter?
12 Q. Okay. Without telling me what was said,
13 who prepared you for today's deposition?
14 A. What do you mean prepared?
15 Q. Did you talk about this deposition, about
16 what would happen, with anybody?
17 A. Yes.
18 Q. Don't tell me what was said?
19 A. Okay.
20 Q. I'm not asking that. I don't want to know
21 that.
22 A. Okay.

23 Q. Who prepared you for today's deposition?

24 A. [REDACTED].

25 Q. Anybody else?

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1 A. No.

2 Q. When did you meet with [REDACTED] to
3 prepare for today's deposition?

4 A. This morning.

5 Q. And how long did that meeting last?

6 A. Until it started.

7 Q. Now you told me that you previously had
8 read the police reports in this case?

9 A. Yes.

10 Q. Have you read your statement that you gave
11 to the police?

12 A. Yes, sir.

13 Q. And in what form was that statement?

14 A. What do you mean?

15 Q. Was it in the form of a police report or a
16 transcript?

17 A. What's the difference?

18 Q. A transcript has questions and answers on
19 it. A police report is just typed out narrative.

20 A. Oh, it's a police report.

21 Q. And when did you read the police report?

22 A. A few days ago. I overread it a few days
23 ago.

24 Q. Had you read it before that?

25 A. No.

1 Q. Now you **told** me -- again, I don't want to
2 know what was said.

3 A. Uh-huh.

4 Q. You **told** me that you met with [REDACTED]
5 **this morning** to prepare for your deposition, right?

6 A. Yes.

7 Q. When did you set up that meeting with
8 [REDACTED] to take place **this morning**?

9 A. Gee, like, like [REDACTED]
10 ago.

11 Q. So you're aware that [REDACTED] told us
12 that he could not start the deposition **this morning**
13 [REDACTED], correct?

14 [REDACTED]: Don't answer that question.

15 Calls for attorney/client communications.

16 BY MR. TEIN:

17 Q. Have you seen the letter that [REDACTED]
18 wrote to us stating that he -- an e-mail that [REDACTED]
19 wrote to Mr. Goldberger stating that he could not be here
20 **this morning** because [REDACTED]? Did you
21 see that e-mail?

22 [REDACTED]: You can answer that question.

23 THE WITNESS: No.

24 BY MR. TEIN:

25 Q. Have you **listened** to your tape-recorded

1 **statement** to the police?

2 A. Yes.

3 Q. Where did you **listen** to that?

4 A. In, I think, **this building**. I don't know.

5 It was here.

6 Q. When did you listen to that statement?

7 A. This morning.

8 Q. And who was present when you listened to
9 that statement?

10 A. [REDACTED] -- and I forget your name.

11 MR. GOLDBERGER: Ms. [REDACTED].

12 THE WITNESS: Ms. [REDACTED].

13 BY MR. TEIN:

14 Q. And you hadn't listened to your statement
15 before that, correct?

16 A. No, sir.

17 Q. [REDACTED]
[REDACTED]

19 A. No, sir.

20 Q. How many times have you spoken to officers
21 with the Palm Beach Police Department?

22 A. More than I like can count. It's been
23 ongoing for [REDACTED], so quite a few times.

24 Q. When was the last time you spoke with
25 officers of the Palm Beach Police Department?

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1 A. A while ago. I'd say [REDACTED].

2 Q. [REDACTED]?

3 A. Yeah. Maybe a [REDACTED].

4 Q. Do you remember Detective [REDACTED]?

5 A. No.

6 Q. Do you remember [REDACTED], Detective
7 [REDACTED]?

8 A. Yes.

9 Q. How many **times** have you spoken to Detective
10 **[REDACTED]**?

11 A. She was **the only one I spoke to about this**
12 **until** for some reason she wasn't on the case anymore.

13 Q. When was **that**?

14 A. The **first meeting I ever had was with her**
15 **and then I think like I met with her [REDACTED]**

[REDACTED] or something like that, and then I didn't get --
17 **another investigator questioned me after that.**

18 Q. And who was **that**?

19 A. **I don't remember.**

20 Q. And what **type of questions did they ask**
21 **you?**

22 A. The same.

23 Q. The same **questions all over again?**

24 A. **Basically.**

25 Q. How many **taped statements** have you given to

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1 **the police?**

2 A. One **that I know of.**

3 Q. **Just the one with [REDACTED]?**

4 A. Yes, **sir.**

5 Q. How about **to the FBI? Did you give any**
6 **statements to them?**

7 A. No. **Well, actually. I don't really**
8 **remember if that was taped or not to be honest with you.**
9 **I had one meeting with them at my house and don't know if**
10 **it was taped.**

11 Q. You were **interviewed at [REDACTED]**
12 **house?**

13 A. No. **That was by the lawyer.**

14 Q. Oh, boy the lawyer?
15 A. Uh-huh.
16 Q. Where did the conversation that you had
17 with the FBI take place?
18 A. At my [REDACTED].
19 Q. Which is where?
20 A. On [REDACTED].
21 Q. On where?
22 A. [REDACTED].
23 Q. And when did that take place?
24 A. I'd have to say like a [REDACTED] ago,
25 [REDACTED] ago. It was a long time ago.

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1 (Discussion held off the record.)
2 MR. TEIN: Tell me the last answer, please.
3 (Thereupon, a portion of the record was read
4 by the reporter.)
5 BY MR. TEIN:
6 Q. And who was present when the FBI spoke to
7 you at [REDACTED]?
8 A. My [REDACTED] was there, but she wasn't
9 around. She made herself like do other things.
10 Q. And how many FBI agents were there?
11 A. I think four.
12 Q. And you don't remember any of their names?
13 A. No, sir.
14 Q. And were there any lawyers there?
15 A. Not that I know of.
16 Q. And none of them gave you their cell phone
17 numbers?

18 A. No.

19 Q. And the last time you spoke to the FBI was
20 a [REDACTED] ago?

21 A. It was a while ago.

22 [REDACTED]: Objection. Asked and
23 answered.

24 BY MR. TEIN:

25 Q. And the last time you spoke to the federal

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1 prosecutor's office was when?

2 A. I don't know.

3 Q. Did any of the FBI agents tell you that
4 [REDACTED] had spoken with [REDACTED]?

5 A. No.

6 Q. Did any of the FBI agents tell you that
7 [REDACTED] had spoken with Mr. [REDACTED]?

8 A. No.

9 Q. Did any FBI agents tell you that [REDACTED]
10 [REDACTED] spoke with Mr. [REDACTED].

11 A. No.

12 Q. Did any FBI agents tell you that [REDACTED]
13 [REDACTED] spoke with [REDACTED]?

14 A. No.

15 Q. Do you know whether any of the federal
16 prosecutors allowed Mr. [REDACTED] to review a draft
17 indictment?

18 A. I wouldn't know.

19 Q. Do you know if any of the federal
20 prosecutors discussed a draft indictment with Mr. [REDACTED]?

21 A. I wouldn't know.

22 Q. Have you ever e-mailed with any FBI agent
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23 or any federal prosecutor?

24 A. No.

25 Q. Have you ever text messaged with any FBI

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1 agent or any federal prosecutor?

2 A. No.

3 Q. Has the FBI told you about other testimony?

4 A. No.

5 Q. Has the FBI told you about what other girls
6 have said?

7 A. No.

8 Q. Have federal prosecutors told you what
9 other girls have said?

10 A. No.

11 Q. Do you have any way of getting in touch
12 with the FBI if you wanted to get in touch with them?

13 A. No.

14 Q. How about your parents? Do they know how
15 to get in touch with the FBI?

16 A. I don't know.

17 Q. And by your parents, I'm referring to [REDACTED]
[REDACTED], okay?

19 A. Oh. Well, I'm referring to only [REDACTED],
20 because [REDACTED]
[REDACTED]

22 Q. So the answer would be the same for your
23 [REDACTED]

24 A. Yeah.

25 Q. Have you spoken to a lawyer named [REDACTED]

1 [REDACTED] about this case?
2 A. No.
3 Q. Do you know who [REDACTED] is?
4 Let's see if I can refresh your memory.
5 Does it refresh your memory that he's a [REDACTED]
6 [REDACTED] [REDACTED]?
7 A. I don't know who [REDACTED] is.
8 Q. [REDACTED] is the lead federal
9 prosecutor that's on the federal part of this case.
10 Okay?
11 A. No.
12 Q. So does it refresh your memory that [REDACTED]
13 [REDACTED]?
14 A. Not at all.
15 Q. Does it refresh your memory that [REDACTED]
16 tried to get [REDACTED]
17 in the federal case?
18 A. No.
19 Q. Do you know if Detective [REDACTED] has spoken
20 with your [REDACTED]?
21 A. No.
22 Q. Do you know if Detective [REDACTED] has spoken
23 to your [REDACTED]?
24 A. No.
25 Q. How about with [REDACTED]?

1 A. Yes, I would know, and no, she did not.
2 Q. Let's put up -- let me ask you some
3 questions about the photo that you had posted on your
4 MySpace page before you erased it [REDACTED] Okay?

5 A. Okay.
6 MR. TEIN: Do you mind if we close the door
7 a second, please.
8 [REDACTED]: Exhibit number, please.
9 MR. TEIN: Put up 25-005.
10 Hold on a second.
11 [REDACTED]: Don't say anything. She was
12 talking to her counsel.
13 MR. TEIN: Put up 25-006.
14 [REDACTED]: Is that 005 right there?
15 MR. TEIN: Yes.

16 BY MR. TEIN:

17 Q. Who took this photo of you in a [REDACTED]
18 [REDACTED] by a bunch of --
19 [REDACTED]: Objection. Mischaracterizes
20 the photograph, and lack of foundation and
21 predicate.
22 Fully explain if you need to.
23 THE WITNESS: I will.
24 First of all. This is not a [REDACTED].
25 This is in [REDACTED] garage.

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1 Second of all, I'm not being [REDACTED].
2 Everyone has their clothing on.
3 Thirdly, if you look at all the other
4 pictures in this album, I'm drinking -- what's
5 when you're sick you drink it?

6 BY MR. TEIN:

7 Q. You can't ask questions of your counsel.
8 A. All right. I'm drinking like Sprite. I'm

9 note drinking any kind of alcohol, if you would look at
10 my other pictures in that album. You guys picked the
11 possibly worst pictures out of there to present. And it
12 was just a goofy picture. All of these kids like to be
13 goofy. And that's what we were doing.

14 Q. Who's the man on the left of the picture
15 holding his -- holding a beer bottle as if it were a
16 penis towards your mouth?

17 A. [REDACTED].

18 Q. Who's the man behind you, right up towards
19 your backs side, with you bent over?

20 A. That one?

21 Q. The right side, kissing with his mouth.

22 A. That's [REDACTED].

23 Q. He's the one grabbing towards the groin
24 area of [REDACTED]?

25 A. Yes.

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1 Q. And there's three other men in the photo.
2 What are their names? The one on the left with the hat?

3 A. That's [REDACTED] (phonetic).

4 Q. Smiling?

5 A. Yes.

6 Q. Who's the one kissing --

7 [REDACTED]: Don't interrupt. Let her
8 finish the record. She's testifying.

9 MR. TEIN: I know you don't like this
10 picture, my friend.

11 [REDACTED]: The picture is fine.

12 BY MR. TEIN:

13 Q. Who's the one with the hat?

14 [REDACTED]: No. Hold on. Stop, [REDACTED].
15 You have to let the witness finish her
16 answer. She was in the process of explaining and
17 you cut her off.
18 Please finish what you were saying and then
19 Counsel can ask you whatever he wishes after that.
20 THE WITNESS: Okay. This guy --
21 [REDACTED]: Just make it so the record is
22 clear who you're referring to.
23 THE WITNESS: -- on the far left is [REDACTED]
[REDACTED]
25 BY MR. TEIN:

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1 Q. He's the one whose head is near the groin
2 of [REDACTED], right?
3 A. Yes.
4 Q. And in the middle there's a man smiling.
5 Who's that?
6 A. That's [REDACTED].
7 Q. Who's the one in the red hat, kissing?
8 A. [REDACTED] (phonetic).
9 Q. Let me stop you for a second. Are you
10 done?
11 A. Yes, I'm done.
12 Q. Who is [REDACTED]?
13 A. My [REDACTED]
[REDACTED].
15 Q. What is her last name?
16 A. [REDACTED].
17 Q. Spell that.

18 A. I don't know how to --
 19 Q. Have you spoken to her about this case?
 20 A. No.
 21 Q. Who's [REDACTED]?
 22 A. My [REDACTED]. I don't really speak
 23 to him at all.
 24 Q. What's his last name?
 25 A. [REDACTED].

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1 Q. [REDACTED]?
 2 A. [REDACTED].
 3 Q. And have you spoken to [REDACTED] about this
 4 case?
 5 A. No, sir.
 6 Q. Have you spoken to [REDACTED] about this case?
 7 A. Not in detail, but yes.
 8 MS. [REDACTED]: Are we referring to
 9 [REDACTED]?
 10 THE WITNESS: Yes.
 11 MR. TEIN: Yes.
 12 MS. [REDACTED]: Okay.

13 BY MR. TEIN:
 14 Q. Have you spoken to [REDACTED] about this case?
 15 A. [REDACTED]?
 16 Q. Do you have a friend named [REDACTED]?
 17 A. I do not have a friend named [REDACTED].
 18 Q. From freshman year?
 19 A. No.
 20 Q. How about [REDACTED]?
 21 A. No.
 22 Q. Have you spoken to [REDACTED] about this case?

23 A. No.
24 Q. What's her last name?
25 A. [REDACTED]. I don't know how to spell it?

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1 Q. Is she the person whose house you went to
2 on New Year's this year?
3 A. No. I wasn't at her house on New Year's.
4 Q. Where were you when you took the picture of
5 [REDACTED]? That on your website?
6 A. I wouldn't know or -- wait. We were at a
7 birthday party for some girl's 16th birthday.
8 Q. Were you drinking at that party?
9 A. No. There was no alcohol or anything
10 there.
11 Q. What does [REDACTED] mean to you?
12 A. It's like -- it just means like messed up.
13 But we weren't, if you look at the picture.
14 Q. Messed up like drunk, right?
15 A. Sure.
16 Q. Who's [REDACTED]?
17 A. A girl I know like from like two years ago.
18 Q. She's the one you were supposed to be
19 staying with when you went drinking with [REDACTED]?
20 A. No.
21 Q. What's [REDACTED] last name?
22 A. [REDACTED].
23 Q. Where does she live?
24 A. I don't know. In [REDACTED].
25 Q. [REDACTED]?

1 A. Uh-huh. I'm guessing.
2 Q. Do you know her phone number?
3 A. No, I do not.
4 Q. Let's look at 25-010.
5 A. See, I'm drinking --
6 Q. I'm not asking you about what you're
7 drinking.
8 Who are the men in this photo who are
9 [REDACTED]?
10 Who are they?
11 A. [REDACTED] and [REDACTED] (phonetic).
12 Q. Are they [REDACTED]?
13 A. Are those? [REDACTED] -- he said the
14 [REDACTED]. That's why I said that. I
15 don't know. That's [REDACTED] and [REDACTED].
16 Q. Are these [REDACTED]?
17 A. No. They're all on -- except [REDACTED],
18 they're all on [REDACTED].
19 Q. Go to 025-015?
20 [REDACTED]: 025- dash?
21 MR. TEIN: 015.
22 THE WITNESS: Gosh, that's so long ago.
23 BY MR. TEIN:
24 Q. Who took the photo have you licking the
25 penis?

1 A. My [REDACTED].
2 Q. Whose idea -- that was your [REDACTED]
3 idea?
4 A. It was in [REDACTED], where she works

5 currently and that was before she worked there, and we
6 just thought it would be funny.

7 MR. TEIN: 19-007. Can you enlarge that?

8 BY MR. TEIN:

9 Q. Who took this photo of you simulating you
10 having sex with a man?

11 A. We're not simulating having sex, and
12 it's -- oh, and the person who took it was, I'm pretty
13 sure, [REDACTED], but I know him as [REDACTED]. I don't know his
14 last name.

15 Q. Go to 19-006, please.

16 Who took this photo of you simulating sex
17 with a man?

18 A. The same person. And we're not simulating
19 having sex, Mr. --

20 Q. Tein.

21 Did you post that on the Internet?

22 A. Actually, this is an old MySpace I never
23 finished and I never like did anything. I just kind of
24 made it and left it.

25 Q. So the answer is yes, you posted this on

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1 MySpace?

2 A. Yup.

3 Q. Go to 25-016. Who took this photo of you
4 simulating sex with a woman?

5 [REDACTED]: Object to the form of the
6 question. Argumentative.

7 THE WITNESS: First off, she's [REDACTED]
[REDACTED], and I'm pretty sure

9 **it was just like we put up a camera somewhere and**
10 **put a timer on it. We didn't have anybody take**
11 **it.**

12 BY MR. TEIN:

13 Q. You posted that on your MySpace page?

14 A. Yeah.

15 Q. Go to 25-013. Is that a photo of you?

16 A. Yep.

17 Q. Who's in the photo with you?

18 A. ██████.

19 Q. ██████?

20 A. Yep.

21 Q. Is this you coming out of the shower?

22 A. Yes.

23 Q. Are you clothed in this picture?

24 A. Yeah. I have a halter dress on.

25 Q. Where is that picture taken?

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1 A. In ██████ house.

2 Q. Did you post that on the Internet?

3 A. Yes.

4 Q. All right.

5 MR. TEIN: You can take that down.

6 BY MR. TEIN:

7 Q. Now your boy friend is ██████████,
8 correct?

9 A. Yeah.

10 Q. You lie about your age in order to conceal
11 something about your relationship with ██████████;
12 isn't that correct?

13 A. No.

14 Q. [REDACTED] years old, isn't he?
15 A. Yes.
16 Q. [REDACTED] is a [REDACTED]
[REDACTED] right?
18 A. Yup.
19 Q. Does the [REDACTED]
[REDACTED] is dating an underage girl?
21 A. Actually, Mister, it's legal.
22 Q. Well --
23 [REDACTED]: Just answer the question,
24 [REDACTED].
25 THE WITNESS: Yes.

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1 BY MR. TEIN:
2 Q. Did they know two weeks ago that you were
3 dating an underage girl (sic)?
4 A. Yes. I met everybody in there.
5 Q. Did they know your age?
6 A. Yes.
7 Q. Did you lie about your age so that [REDACTED]
[REDACTED] wouldn't think that [REDACTED] is committing a
9 crime by having a sexual relationship with an underage
10 girl?
11 MS. [REDACTED]: Objection. Assumes facts
12 not in evidence.
13 BY MR. TEIN:
14 Q. You can answer the question.
15 A. No.
16 Q. Does the Palm Beach Police Department know
17 that [REDACTED] is having a sexual relationship with an

18 underage girl?

19 [REDACTED]: Don't guess. Answer if you
20 know.

21 THE WITNESS: Can you repeat the question?

22 BY MR. TEIN:

23 Q. Does the Palm Beach Police Department know
24 that [REDACTED],
25 is having a sexual relationship with an underage girl?

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1 A. I'm guessing no.

2 Q. You lie about [REDACTED] [REDACTED], don't
3 you?

4 [REDACTED]: Objection. Argumentative.

5 BY MR. TEIN:

6 Q. Don't you?

7 A. No. I have never lied for or to [REDACTED].

8 Q. You lie about the fact that she has a s
9 drug habit, right?

10 A. No. I would never accuse [REDACTED]
[REDACTED].

12 Q. Do you try to conceal the fact that she has
13 a drug habit?

14 [REDACTED]: Objection. Argumentative.

15 BY MR. TEIN:

16 Q. You can answer the question.

17 A. No. [REDACTED].

18 Q. You lied when you went to [REDACTED]
[REDACTED], didn't you?

20 [REDACTED]: Objection. Argumentative.

21 Lack of foundation, lack of predicate.

22 THE WITNESS: Never -- what did you say?

23 BY MR. TEIN:

24 Q. You **lied** when you went to [REDACTED]
[REDACTED] **didn't** you?

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1 [REDACTED]: **Objection. Argumentative.**
2 **Lack of foundation, lack of predicate.**

3 BY MR. TEIN:

4 Q. You can answer **the question.**

5 A. **I have never been to [REDACTED].**

6 Q. Who **don't** you **lie** to?

7 [REDACTED]: **Objection. Argumentative.**
8 **Don't answer the question.**

9 MR. TEIN: **Certify it.**

10CERTIFIED QUESTION.....

11 BY MR. TEIN:

12 Q. You **don't lie** to [REDACTED], do you?

13 [REDACTED]: **Objection. Asked and**
14 **answered.**

15 **Don't answer the question.**

16 BY MR. TEIN:

17 Q. **No. You can answer that question.**

18 [REDACTED]: **No. I just told her not to.**

19 **You've asked that question about five --**

20 MR. TEIN: **No, I haven't.**

21 [REDACTED]: **Don't answer the question.**

22 MR. TEIN: **I'll certify it.**

23CERTIFIED QUESTION.....

24 [REDACTED]: **For the record, you have to**
25 **stop interrupting me because she can't take down**

1 both of us talking at the same time.

2 BY MR. TEIN:

3 Q. You tell [REDACTED] the truth, don't you?

4 A. Excuse me?

5 Q. You tell [REDACTED] the truth, don't you?

6 A. When it's -- yes, I tell [REDACTED] the truth.

7 Q. [REDACTED]

8 A. [REDACTED]

10 Q. Okay. [REDACTED]

14 A. [REDACTED].

15 Q. [REDACTED]

16 A. [REDACTED]

17 Q. [REDACTED]

20 A. I do remember that.

21 Q. Now before you massaged Epstein, [REDACTED]

24 A. [REDACTED]

1 A. [REDACTED]

3 Q. And you went there because you were lying
4 so much, no one could control you; isn't that correct?

5 A. Very incorrect.
6 Q. Now you lie to your parents all the time,
7 don't you?
8 A. Incorrect.
9 [REDACTED]: Objection. Argumentative.
10 BY MR. TEIN:
11 Q. Sorry?
12 A. Incorrect.
13 Q. The day you went to Epstein's house you
14 lied to your father about where you were going; isn't
15 that correct?
16 A. Correct.
17 Q. You admitted to the police that you told
18 your father that you were going shopping, didn't you?
19 A. Yes.
20 Q. And that was a lie, wasn't it?
21 A. Yes.
22 Q. And isn't it true that your father has
23 accused you of lying?
24 A. All the time.
25 Q. [REDACTED]

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[REDACTED]
[REDACTED]
3 A. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

15 [REDACTED]: **Objection.** Lack of
16 **foundation.** **Calls for speculation.**

17 BY MR. TEIN:

18 Q. When your counsel coaches you, you say **it's**
19 **correct, right?**

20 A. **I've never been coached.**

21 [REDACTED]: **Objection.**

22 BY MR. TEIN:

23 Q. Okay. When your counsel **that it was there**
24 **was lack of foundation,** you agree **with your counsel,**
25 **right?**

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1 A. **I was like saying, Yeah, let's move on,**
2 **because there was no point to asking that question.**

3 Q. Your father [REDACTED]
4 **because she was lying, correct?**

5 [REDACTED]: **Objection.** Lack of
6 **foundation.**

7 **Hold on, [REDACTED]. Let me just make the**
8 **objection.**

9 **Lack of foundation, predicate, calls for**
10 **speculation.**

11 BY MR. TEIN:

12 Q. **Answer.**

13 A. **I'm not [REDACTED] I don't know.**

14 Q. I want to know what you know only.
15 A. I don't know.
16 Q. You don't know. That's your answer?
17 A. Yes.
18 Q. Now [REDACTED] filed the police report
19 regarding Mr. Epstein, right?

20 A. Yes.
21 Q. Now [REDACTED] are also lying, aren't
22 they?

23 A. Yes.
24 [REDACTED]: Just so the record is clear,
25 [REDACTED]

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1 MR. TEIN: Don't testify, Counsel.
2 [REDACTED]: So the record is clear, the
3 [REDACTED]

4 MR. TEIN: Counsel, don't coach and
5 testify, please. That's absolutely improper.

6 [REDACTED]: You just asked the wrong
7 question.

8 MR. TEIN: You can't coach her that way and
9 you well know it.

10 [REDACTED]: For the record, it's the
11 [REDACTED]

12 [REDACTED]
13 MR. TEIN: You cannot -- it's absolutely,
14 totally against the rules and you know it.

15 [REDACTED]: [REDACTED]
16 [REDACTED]

17 MR. TEIN: You need to behave yourself,

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lawyer.
[REDACTED]: The [REDACTED]
[REDACTED]
MR. TEIN: Stop coaching. Stop talking.
You object. You know the rules. You just
lectured me about the rules, Counsel. So why
don't you play by the rules. Or only when they
fit you? Why don't you grandstand a little more

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now. Give us a five-minute speech, [REDACTED].
[REDACTED]: Are you finished, for the
record.

MR. TEIN: I'm not talking to you. Do what
you want.

[REDACTED]: Don't say anything yet.

BY MR. TEIN:

Q. [REDACTED], [REDACTED]

[REDACTED]: Hold it. Don't say anything
yet. Let me --

BY MR. TEIN:

Q. [REDACTED], who filed the police report
are also liars.

[REDACTED]: Don't answer the question.
We're not going to answer until I make the record.
I want to put on the record, now that Counsel
appears to be finished with his comments for the
record, that the previous question was
inappropriate, was intentionally misleading.

Now you can ask the question.

BY MR. TEIN:

Q. [REDACTED] who filed the police report

1 THE WITNESS: Yeah.

2 BY MR. TEIN:

[REDACTED]

11 Q. And you don't trust [REDACTED], do you?

12 A. Correct.

13 Q. And you believe he's trying to manipulate
14 you for his own gain, don't you?

15 A. Sort of.

16 Q. Well, you know that [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

20 A. Correct.

21 Q. You agree with that statement, don't you?

22 A. Uh-huh. Yes.

23 Q. Do you trust your [REDACTED]?

24 A. [REDACTED]

25 Q. [REDACTED]

[REDACTED]
2 A. I would like to clarify something. [REDACTED]
[REDACTED]
[REDACTED] So I just

5 don't trust her.

6 Q. Okay. You think that [REDACTED]

9 A. Yes.

[REDACTED]

25 MR. TEIN: Let's take a break.

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1 (Thereupon, a recess was taken.)

2 BY MR. TEIN:

3 Q. [REDACTED], before you met Jeffrey Epstein have
4 you ever had sexual intercourse?

[REDACTED]

[REDACTED]

24 [REDACTED]: **Objection to the form of the**
25 **question.**

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1 [REDACTED]
[REDACTED]

3 BY MR. TEIN:

4 Q. Before you met Epstein, had you ever had
5 oral sex?

6 A. No.

7 Q. Ever in your life, have you exchanged sex
8 for something of value?

9 A. No.

10 MR. TEIN: We're done.

11 THE WITNESS: Oh, okay.

12 [REDACTED]: We'll read.

13 MS. [REDACTED]: I don't have any

14 questions. Thank you.

15 [REDACTED]: Before we go off the record,
16 it's my understanding -- Mr. Goldberger can
17 correct the record, but we have stipulated that
18 color copies of the documents that were identified
19 for identification certainly will be attached to
20 the deposition and counsel will be taking the
21 photographs across street so that they can be
22 laser color copied so that we have a copy, and I'm
23 assuming he'll get a copy to the court reporter,
24 too, to attach, actually a certified copy to the
25 deposition.

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1 MR. GOLDBERGER: Done.

2 [REDACTED]: That's if you agree to that.
3 If not, then I want to pull each one out and put
4 exhibit labels on them, which we should do before
5 we leave.

6 MR. GOLDBERGER: We're not going to do
7 either. I'll have copies sent to the court
8 reporter and she can attach them to the
9 deposition.

10 [REDACTED]: So you're not going to agree
11 to what we talked about during the break then.

12 MR. GOLDBERGER: I'm not quite sure what
13 your asking me to do. Let me finish.

14 [REDACTED]: Okay. Sure. That's fine.

15 MR. GOLDBERGER: Okay. If you want me to
16 go over to Ms. [REDACTED] office and make copies
17 and then I'll give those to the court reporter,

18 fine. All I'm saying is that I would avoid that
19 process. I would send copies to the court
20 reporter. But if it will make you happier --
21 [REDACTED]: I'm not?
22 MR. GOLDBERGER: Let me finish.
23 [REDACTED]: I'm not interrupting now.
24 MR. GOLDBERGER: But if it will make you
25 happier if I go over to Ms. [REDACTED] office

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1 and make a copy of those photos that were part of
2 this deposition and then I'll give them to the
3 court reporter, I'll be happy to do it.
4 [REDACTED]: I trust you implicitly,
5 however you wish to do it. However, the
6 documents, before they leave this room, need to
7 have an exhibit sticky on them with the
8 appropriate --
9 MR. GOLDBERGER: Want to go get some? We
10 don't have any.
11 [REDACTED]: I will do that. Excuse me.
12 Let me finish the record, please. You can't do
13 that to the court reporter. She's going to stroke
14 out. You can't do that. You have to let me --
15 MR. TEIN: Finish your sentence, [REDACTED]. You
16 are the most long-winded lawyer I've ever seen in
17 my life. Finish your sentence.
18 [REDACTED]: Jack, tell him not to raise
19 his voice, please.
20 MR. TEIN: Finish your sentence. Is there
21 going to be a period at the end of the sentence or
22 is it just going to be comma after comma after

23 comma?

24 Go ahead, lawyer.

25 [REDACTED]: All right. The exhibits, I

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1 can't prevent you from taking them, but I will
2 object and I will be bringing it to the court for
3 sanctions. You cannot take the exhibits out of
4 the room without them being marked. I want them
5 marked, because you cannot identify in the record
6 what was used. And with all due respect to
7 Mr. Goldberger, I do not -- the way this
8 deposition is going, I do not want to rely on
9 Counsel from Miami to mark the appropriate
10 exhibits. I will not do that. I cannot prevent
11 you from taking them. But if you do, I will be
12 bringing the matter to the court with appropriate
13 sanctions, because that is improper. That is
14 improper. When you use something in a deposition,
15 they are to be marked. And you have refused to do
16 that throughout for what ever reason.

17 MR. TEIN: You're wrong. Finish your
18 sentence because you're talking about something
19 you have no idea.

20 Every single one is marked, [REDACTED]. Every
21 single one is already marked. But you want to
22 argue about everything. Ever single one is
23 already marked. Isn't that silly, [REDACTED]?

24 MR. GOLDBERGER: Thirty years of doing this
25 and I have never had an argument over this.

1 MR. TEIN: You've made -- ■■■, you are
2 **obstructionist**, you are a **liar**. You have **lied** and
3 **misrepresented things**, for the record. You are
4 **grandstanding**.

5 ■■■: You need to back up.

6 MR. TEIN: No, no. **I'm going to finish**.

7 ■■■: You can **finish**, but don't
8 **hover** over me.

9 MR. TEIN: No one is **hovering** over you.
10 **Stop trying** to make a **lying** record.

11 **Let** me say something else.

12 **Don't** you dare **threaten** me with **sanctions**,
13 **after** you **lied** in a **letter** to my co-counsel about
14 **the fact** -- be quiet. Be quiet and **let** me **finish**.
15 You **lied** in a **letter** to my co-counsel,
16 ■■■, in which you said -- **it** was a
17 **complete** and **utter lie** -- that you were
18 **unavailable** **this** morning because you had a
19 **hearing**. That was a **lie**. I have never seen each
20 **lawyer** **deign** to do something **like** that.

21 So you **will** get the ex -- be quiet. **Let** me
22 **finish**. You behave.

23 ■■■: **Don't** point your **finger** at
24 me.

25 MR. TEIN: **Listen**. Be quiet and I won't

1 have a need to **point it** at you.

2 ■■■: **Don't** point your **finger** at --

3 MR. TEIN: ■■■ --

4 ■■■: **Don't** point your **finger** at
Page 108

5 me.
6 MR. TEIN: [REDACTED], let me finish.
7 [REDACTED]: Don't raise your voice
8 either.
9 MR. TEIN: [REDACTED] --
10 [REDACTED]: Jack, do you want to take
11 care of this?
12 MR. TEIN: Let me finish my sentence. The
13 exhibits are marked. We are walking out of here.
14 You are someone who misrepresents the
15 record. It is absolutely atrocious what you do.
16 That is not how a lawyer should behave. This
17 deposition is over. You will get your exhibits,
18 [REDACTED].
19 MR. GOLDBERGER: I understand what you're
20 saying, Michael, and I understand [REDACTED] position.
21 Just so there's -- we're going to have lots
22 offer issues in this case. We're going to have
23 lots of reasons to disagree.
24 I'm going to take it over now and I'm going
25 to make copies and I'm going to give them to

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1 Ms. Consor. If you want to go find some exhibit
2 labels and put some exhibit labels on it, be my
3 guest. But that's what I'm offering to do.
4 THE WITNESS: Let me say two things,
5 because I am happy to always disagree and with
6 you, I have no problem; we could always do it
7 professionally.
8 I want to say two things so the record is

9 very clear. Since for whatever reason I have not
10 been able to look at exhibits because they have
11 been refused to have been shown to me --

12 MR. TEIN: That's a lie.

13 [REDACTED]: Jack, if you represent that
14 the documents have the appropriate exhibit numbers
15 or some identifying markings, 25, 30.000, whatever
16 they may be, then you can take them, make copies,
17 send me a copy, make sure the court reporter gets
18 a copy and then send me a bill for my copy, that's
19 fine. I didn't know that they are marked that way
20 because I haven't been able to look at them.

21 MR. GOLDBERGER: They are barcoded and the
22 number that we've made reference to in the
23 deposition coincides with the barcoding.

24 [REDACTED]: That's fine. Eight by eleven
25 color laser copies are fine.

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1 MS. [REDACTED]: The State Attorneys Office
2 is not going to charge anybody for color copies I
3 print out.

4 [REDACTED]: That's fine. He's going to
5 take them back to his office .

6 Secondly -- and I will be more than happy
7 to do it, because it sounds like you all know more
8 about it than I, but I'm happy to get affidavits
9 from [REDACTED], [REDACTED], everybody else about
10 what happened with this hearing today, because I
11 know very little about it. But my representations
12 are what they are.

13 MR. GOLDBERGER: They stay --

14 [REDACTED]: Let me **just finish** for the
15 record.

16 Representations or comments about what
17 happened, representation about this hearing this
18 morning, I know very **little** about it. I --

19 MR. GOLDBERGER: I'll take your word on
20 that.

21 [REDACTED]: No, no, no. I **just put it** on
22 the record. I **will get** an affidavit -- I'm
23 assuming it sounds like you need it -- from Mr.
24 [REDACTED]. I have no **clue** about what happened and
25 why it was canceled. All I was **told** when I was

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1 out of town yesterday was that the hearing this
2 morning was cancelled.

3 MR. GOLDBERGER: I'll take your word for
4 it.

5 [REDACTED]: If you want an affidavit,
6 I'll get it for you.

7 MR. GOLDBERGER: It's a personal issue for
8 me because I had to **disrupt** a vacation and if it
9 was done **just** because it wasn't convenient for
10 you, then I'm offended by that. But if you're
11 **telling** me that it was planned and it didn't
12 happen, I'll take your word for it.

13 [REDACTED]: I am more than happy to get
14 you an affidavit, because I don't know the reason
15 why it was canceled other than the fact that I'm
16 assuming since my deposition was taken for four
17 hours on Monday for preparation for the hearing

18 today, for whatever reason it was canceled, I am
19 told it is being re-noticed. Why it was canceled
20 I have no idea, but if your co-counsel wishes an
21 affidavit to that effect from [REDACTED], I'm more
22 than happy to get it. But I don't know the reason
23 why it was canceled.

24 MR. TEIN: I don't need it. But what I do
25 take issue with is regardless of why it was

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1 canceled, you owed us the courtesy of saying, you
2 know what? We can start earlier this morning.

3 [REDACTED]: I owe you nothing.

4 MR. TEIN: I don't care. Don't interrupt
5 me.

6 Because Jack canceled his vacation plans
7 because of you.

8 MR. GOLDBERGER: That's all right, that's
9 all right.

10 MR. TEIN: And you're selfish. And this
11 deposition is over. Good-by [REDACTED].

12 MR. GOLDBERGER: You can go off the record.

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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 _____, 2008.

[Redacted Signature]

1 DATE: [!MONTH2] DATE2, 2008

2 TO: [REDACTED]

3 X

4 X

5 X, Florida X

6 IN RE: CASENAME

7 CASE NO.: 2006 CF09454AXX

8 Please take notice that on Wednesday, the DATE1 of [!MONTH1], 2008, you gave your deposition in the above-referred matter. At that time, you did not waive signature. It is now necessary that you sign your deposition.

9 ^ Please call our office at the below-listed number to schedule an appointment between the hours of 9:00 a.m. and 4:30 p.m., Monday through Friday.

10 ^As a professional courtesy, I am enclosing a condensed copy of your deposition transcript.

11 ^ As previously agreed to, the transcript will be furnished to you through your counsel. Please read the following instructions:

12 At Page ^ of the transcript, you will find an errata sheet. As you read your deposition, any changes or corrections that you wish to make should be noted on the errata sheet, citing page and line number of said change. DO NOT write on the transcript itself. Once you have read the transcript and noted any changes, be sure to sign and date the errata sheet and return these pages. You need not return the entire transcript.

13 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.

14 Very truly yours,

15

16 Judith F. Consor, FPR
17 Consor & Associates Reporting and Transcription

18 [REDACTED]

19 I do hereby waive my signature:

20

21 [REDACTED]

22

1 cc via transcript: JACK A. GOLDBERGER, Esquire

2 [REDACTED], Esquire

3 MICHAEL R. TEIN, Esquire

4 file copy

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ERRATA SHEET

IN RE: CASENAME
DEPOSITION OF: [REDACTED] TAKEN: [!MONTH1]
DATE1, 2008
DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
PAGE # LINE # CHANGE REASON

9 _____
 10 _____
 11 _____
 12 _____
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 15 _____
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 19 _____
 20 _____

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

22 Under penalty of perjury, I declare that I have read my
 23 **[!TYPE]** and that it is true and correct subject to any
 24 changes in form or substance entered here.

25 DATE: _____ SIGNATURE OF DEPONENT: _____

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1 THE STATE OF FLORIDA,)
 2 COUNTY OF PALM BEACH.)

3
4

5 **I, the undersigned authority, certify that**
 6 **[REDACTED]** personally appeared before me on the DATE1
 7 of **[!MONTH1]**, 2008 and was duly sworn.

8

9 WITNESS my hand and official seal this DATE2
 10 day of **[!MONTH2]**, 2008.

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Judith F. Consor, FPR
Notary Public - State of Florida

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C E R T I F I C A T E

The State Of Florida,)
County Of Palm Beach.)

I, Judith F. Consor, Court Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did stenographically report the [!TYPE] of [REDACTED]; that a review of the transcript was not requested; and that the foregoing pages, numbered from 1 to ^, inclusive, are a true and correct transcription of my stenographic notes of said [!TYPE].

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

I further certify that I am not an 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 DATE2 day of [!MONTH2], 2008.
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Judith F. Consor, Court Reporter
Florida Professional Reporter