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August 28, 2009

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ED RICCI
SPECIAL CONSUMER
JUSTICE COUNSEL

CONFIDENTIAL SETTLEMENT DISCUSSION

Sent by E-Mail Only

Robert Josefsberg, Esq.

[REDACTED]

Re: **Epstein Matter**

Dear Bob:

I am enclosing a copy of the taped interview of [REDACTED] which I believed was taken in 2005 by Det. Recarey. As you will note, the tape was transcribed by a court reporter who listened to the tape. Additionally, I am providing you the statement of [REDACTED] which was taken by Jack Goldberger with Lily Sanchez present on March 21, 2008.

[REDACTED] is demanding \$250,000. I believe after you read her statement, you will be able to conclude she never should have been placed on the list in the first place and has no valid claim; her words, her sworn testimony and given in 2005.

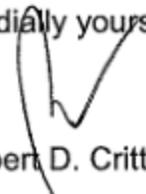
In reviewing [REDACTED] statement, it is significant as to her willingness to lie about her age (with [REDACTED] insistence), she said that she was 17.9 years old; and everything she did, was 100% consensual. She said there was never force, coercion and she was always comfortable around Mr. Epstein. This leads one to believe that this claim also should not exist. She also casts substantial doubt on any claim of [REDACTED]

These statements are being provided to you in furtherance of our settlement discussions, prior agreement and are completely confidential and privileged under both state and federal law and applicable statutes.

August 28, 2009
Page 2

Please let me know if you will be able to get the information that we have requested re: the prior USAO lists so as to continue our good faith dialogue and exchange of information.

Cordially yours,



Robert D. Critton, Jr.

RDC/clz
Enclosure

rne

IN RE: JEFFREY EPSTEIN

TAPED INTERVIEW OF [REDACTED]

ORIGINAL

Sandy Rossi
Notary Public, State of Florida
Conzor and Associates

[REDACTED]

[REDACTED]

1 (Thereupon, the following interview was had:)

2

3 BY DETECTIVE RECAREY:

4 Q -- say nothing but the truth so help you God?

5 A Yeah.

6 Q All right. So tell me from the beginning as far
7 as when you met Mr. Epstein.

8 A As soon as (inaudible) house. And [REDACTED] and
9 [REDACTED] were (inaudible). I'm like what are you guys talking
10 about? And I hadn't really hung out with them. I was kind
11 of with the redneck crowd. They're the preppy girl crowd.
12 And they were telling me about this guy and they would go
13 and give him massages and he'd pay them \$200 for giving a
14 massage for an hour. And they said do you want to do it and
15 I'm like yeah, \$200 for an hour, let's go. So I think about
16 a week later I had gone with [REDACTED] and it was me and her in
17 the room with him and it was kind of weird because he's
18 naked but she's like oh, he's always like that, don't worry
19 about it. And then we just gave him a massage and he gave
20 her \$200 and he gave me \$300 and he asked me to come back.
21 So I'm like okay. I came back about probably about five or
22 six times.

23 Q Okay. He gave you 300 to do a massage, right?

24 A Uh-huh.

25 Q Okay. And that was about a year ago?

1 A Yeah.

2 Q Okay. You were approached about this by Faith and

3 [REDACTED]

4 A Uh-huh.

5 Q Okay. [REDACTED] what's her last name?

6 A Valdez or Vas -- I don't know. It begins with a

7 V.

8 Q Okay. All right. Let's start back from the
9 beginning on the massage. He was naked on the massage?

10 A Yes, with a towel over him.

11 Q Okay. How were you dressed when you were
12 providing the massage?

13 A I think jeans and a tank top.

14 Q Jeans and a tank top. At any time did he ask you
15 to remove your clothing?

16 A He did probably about the third time that I went
17 there.

18 Q Okay.

19 A And I gave him a massage in my bra and underwear.

20 Q Just your underwear. Okay.

21 A That's why I stopped going because he said if you
22 start to feel uncomfortable just (inaudible) anymore.

23 Q Okay. When you were giving him the massage, where
24 did the massage take place?

25 A Like if you go upstairs into his bedroom like his

1 bathroom I guess like there's this big room with like a
2 sauna and a shower and in there.

3 Q Okay. Were there a table already set up?

4 A Sometimes it was already set up and then sometimes
5 when we went up there there's like a little closet and the
6 table is in the closet and we'd bring it out and set it up.

7 Q Did you set it up or --

8 A Yes.

9 Q -- did somebody else set it up for you?

10 A Sometimes it was already set up when we got there.

11 Q Okay.

12 A Sometimes I had to set it up.

13 Q Okay. How were you taken to the bedroom area?

14 A Usually [REDACTED] would lead you up but after you were
15 there a couple times she'd say go on up.

16 Q Okay. And you went what, five to six times?

17 A Yeah.

18 Q Okay. All right. Let's get back to your first
19 massage you gave. He was wrapped in a towel.

20 A Uh-huh.

21 Q Okay. At any time did he take off the towel?

22 A Only when he got up and put a robe around him.

23 Q Okay. During the time you were providing him a
24 massage, did he ever touch himself?

25 A No. He was laying on his stomach.

1 Q Laying on his stomach the entire time?

2 A Yeah.

3 Q Okay. Did he ever ask you to rub his chest?

4 A Yes.

5 Q Okay.

6 A But not the first time.

7 Q Not the first time. You just massaged his --

8 A His legs and his feet the first time.

9 Q Okay. Feet and --

10 A Shasdy massaged his back and I massaged his feet.

11 Q Okay. So the first time Shasdy and you did the
12 message?

13 A Uh-huh.

14 Q Okay. All right. And you were completely
15 clothed?

16 A Yes.

17 Q Okay. Did he touch you --

18 A No.

19 Q -- during the massage?

20 A No.

21 Q No. Was there any massagers slash vibrators
22 introduced into the massage?

23 A No. Just like he had like this massage cream from
24 Bath and Body Works I think it was from. That's it. And
25 I'd use that.

1 Q Okay. When the second time you went, how did you,
2 how were you contacted?

3 A Asked -- when he asked -- when he gave me \$300 and
4 asked me to come back, I had left him my cell phone number.

5 Q Okay.

6 A And [REDACTED] called me and told me that Jeff had
7 wanted me to come back and then I went down there.

8 Q Okay. Do you recall when this was?

9 A No. I know it started like this time last year
10 because I think about January is the last time I went when I
11 met my boyfriend and he didn't want me going down there.

12 Q So January of this year was the last time you
13 went?

14 A Yeah.

15 Q Okay. All right. So she calls you and tells you
16 to come --

17 A (Inaudible.)

18 Q -- tells you to come to the house to provide, to
19 work?

20 A Uh-huh.

21 Q Did anything happen during that massage?

22 A No. The only thing he ever did was he tried to
23 grab my butt and I told him I didn't feel comfortable with
24 that and he always said that if you didn't feel comfortable
25 just to let him know. He didn't want you to feel

1 uncomfortable.

2 Q Was that on the second massage?

3 A No. Probably about towards the end because I was
4 fully clothed until the third massage.

5 Q Okay.

6 A That was the massage. That's when just I did it
7 in my bra and underwear. And then after that is when I
8 started feeling uncomfortable with it because he was like
9 why don't you take that off and I was like no. And then
10 just -- he never pressured me. He never forced me to do
11 anything. But he would like try to talk you into it and I
12 didn't feel comfortable with it.

13 Q Okay. So you recall both -- the first two times?

14 A Uh-huh.

15 Q Did he touch himself during the second massage?

16 A I guess kinda he would sometimes.

17 Q What do you mean?

18 A Well not -- like towards the end when I was in my
19 bra and underwear like sometimes when I would be rubbing his
20 chest then he would.

21 Q Okay. Did he do it on the second time you went?

22 A No.

23 Q Okay. The third time you went, how were you
24 contacted to go?

25 A [REDACTED] called me again.

1 Q [REDACTED] called you again?

2 Okay. When you got there he asked you to remove
3 your clothing?

4 A Yeah.

5 Q Okay. When you say panties, were they normal
6 panties or were they --

7 A A thong.

8 Q A thong.

9 Okay. You provided the massage?

10 A Uh-huh.

11 Q And this was the first time that he had you rub
12 his chest?

13 A Yes.

14 Q Okay. While you were rubbing his chest, did he
15 masturbate?

16 A Yes.

17 Q Okay.

18 A But this is towards the end.

19 Q Okay. Towards the end of the massage?

20 A No, like towards like the last time I went there.

21 Q Okay.

22 A But yeah, it was towards the end of the massage
23 also. Would you like something to drink?

24 Q No, I'm good. I'm good.

25 A Okay. I've lost all my manners. (Inaudible.)

1 Q That's okay. Do you know if he climaxed?

2 A I don't know. He still had the towel over him.

3 Q He never removed the towel?

4 A No. Judging by the his breathing I would think
5 that he did but I never asked if he did.

6 Q And do you know what I mean when I say
7 masturbate --

8 A Yes.

9 Q -- and climax?

10 A Yes.

11 Q Okay. All right. So each time you went to the
12 house, at what point did he try to escalate to more than
13 just a massage?

14 A Like it would start out as a normal massage and
15 he'd like sit down and talk to you and stuff and then he'd
16 be like oh, well come here and do this or do that and he's
17 like if you told him no he wouldn't, you know, he wouldn't
18 make a big deal out of it. If you told him you felt
19 uncomfortable about anything then --

20 Q Okay. When did he grab your buttocks?

21 A I don't know. One of the times I was giving a
22 massage. I really can't --

23 Q Okay. Did he ever grab more than just your
24 buttocks?

25 A No, because I made it clear when he did that that

1 I was very uncomfortable and I left.

2 Q Okay. Did he ever touch your breasts?

3 A No.

4 Q Okay. Did he ever touch your vagina area?

5 A No.

6 Q Okay. Did he ever bring out any kind of sexual
7 toys?

8 A No.

9 Q When was the last time you were contacted by
10 anybody at the Epstein (inaudible)?

11 A The last time I went there because I told him that
12 I wasn't coming back.

13 Q Okay. So January 2005 approximately?

14 A Yes.

15 Q The very last time you went, did he, did he
16 continue like when you were giving him a massage,
17 masturbate?

18 A No, because I was giving him the massage and I
19 kept looking at the clock on the sink and I was looking at
20 the clock and he was like why do you keep looking at the
21 clock? And I was like I don't know and I was like because
22 my boyfriend is waiting to come pick me up and he's like
23 well, he's like he said you're supposed to make me enjoy my
24 massage right now. He said you're not supposed to be
25 looking at the clock. And I was like well, and he's like if

1 you don't want to do this then you don't have to do it and
2 that's when I told him I don't want to come back anymore
3 because I really don't feel comfortable and, you know, my
4 boyfriend doesn't like that I'm coming here. And then that
5 was it and I haven't spoken to him since.

6 Q On top of the \$300 did he ever offer you more
7 money?

8 A No. He gave me money for Christmas. He Western
9 Unioned I think it was like \$200 as a Christmas present but
10 other than that, that's it.

11 Q For last Christmas?

12 A Yes.

13 Q What -- which Western Union did you pick that up
14 at?

15 A The one in Royal Palm and Okeechobee. I think
16 it's in The Check Cashing Store. There's a Western Union
17 there.

18 Q Okay. Did you ever take anybody to the house?

19 A No. Nobody that I hung out with knew about that.

20 Q Okay. Was there anybody else in the room when you
21 were providing massage --

22 A No.

23 Q -- aside from [REDACTED]

24 A Aside from [REDACTED] no.

25 Q Okay. No other assistants?

1 A No.

2 Q Okay. Did he ever offer you monies to go

3 further --

4 A No.

5 Q -- than just a massage?

6 Okay. How old were you when you first went there?

7 A Seventeen.

8 Q Seventeen.

9 A And I was 17 the last time I went there too. I
10 just turned 18 this past June.

11 Q When did you turn 18?

12 A June that just passed.

13 Q June that just passed?

14 Did Shasdy ever tell you that you would have to
15 provide the massage naked or --

16 A No. They just told me that we were going to do a
17 massage.

18 Q Okay. All right. You were attending Royal Palm
19 Beach High School --

20 A Yes.

21 Q -- okay, at the time?

22 A Kinda. I kind of dropped out right in the middle.

23 Q Okay. Did you ever finish school?

24 A No. Actually tomorrow is my GED test.

25 Q Well good luck with that.

1 A Thank you. I fell in love, moved to Jupiter, it
2 didn't last forever, blah, blah, blah.

3 Q This is the guy that didn't want you going back
4 anymore?

5 A Yeah. Yeah.

6 Q You guys aren't together anymore?

7 A It's off and on. We got engaged. We were
8 together off and on for nine years so (inaudible).

9 Q I guess the best thing he did was have you stop
10 going.

11 A Yeah.

12 Q Is there anything else you would like to add?

13 A No. I actually have some questions as to what's
14 going on with this.

15 Q Well, this is an ongoing investigation. We
16 received a complaint and we're following it up. Obviously
17 based on the questions that I've asked you, you can pretty
18 much figure out what this is --

19 A Yeah. Is Jeffrey in custody?

20 Q Not at this time. But this is an ongoing
21 investigation so I would appreciate that if anybody contacts
22 you, I know that friends have been calling each other and
23 telling them oh my God, there's a cop here, whatever, asking
24 me questions.

25 A Yeah, this is Royal Palm. That's big news in this

1 little town.

2 Q Well, I would appreciate it if you didn't, you
3 know, say anything what we discussed. Especially if [REDACTED]
4 calls you or anybody else calls you, you could say that I
5 was here and if they have any questions they can give me a
6 call. Obviously if anybody from the -- Jeffrey's house
7 calls you, I'd also appreciate it if you call back and let
8 me know.

9 A Okay.

10 Q All right?

11 A All right.

12 DETECTIVE RECAREY: At this time I'm going to
13 go ahead and conclude this tape. The time on my
14 watch is 12:45.

15 (Thereupon, the interview ended.)

16 - - -

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25

1 C E R T I F I C A T E

2

3 STATE OF FLORIDA)
COUNTY OF PALM BEACH)

4

5 I, Sandra Rossi, Court Reporter, State of
Florida at Large, certify that I was authorized to
6 and did stenographically report the forgoing
proceedings, and that the transcript is a true and
7 complete record of the tape as listened to by me.

8

9 Dated this 30th day of January, 2007.

10

11

Sandra Rossi -----

Sandra Rossi, Court Reporter

12

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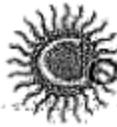
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THE STATE OF FLORIDA,)
COUNTY OF PALM BEACH.)

IN RE:

JEFFREY EPSTEIN.

SWORN STATEMENT OF [REDACTED]

Friday, March 21, 2008
4:00 p.m. - 4:20 p.m.

[REDACTED]

Reported By:
Judith F. Consor, FPR
Notary Public, State of Florida
Censor & Associates Reporting and Transcription
West Palm Beach Office
Phone - [REDACTED]

1 Statement taken before Judith F. Consor,
2 Court Reporter and Notary Public in and for the State of
3 Florida at Large, in the above cause.

4
5 Thereupon, [REDACTED]

6
7 having been first duly sworn or affirmed, was examined
8 and stated as follows:

9 THE WITNESS: I do.

10 BY MR. GOLDBERGER:

11 Q. Would you state your name for the record,
12 please.

13 A. [REDACTED]

14 Q. Okay [REDACTED] where do you live now?

15 A. Address?

16 Q. Sure.

17 A. [REDACTED]

18
19 Q. Do you live there alone or do you live with
20 somebody there?

21 A. My father.

22 Q. Very good. And are you working now or not
23 working? Sometimes you work and sometimes you don't?

24 A. When I want to.

25 Q. Okay. And how old are you today?

1 APPEARANCES:

2 On behalf of the Defendant:
3 JACK A. GOLDBERGER, ESQ.
4 ATTERBURY, GOLDBERGER & WEISS
5 [REDACTED]

6 ALSO PRESENT
7 LILLY ANN SANCHEZ, ESQ.
8 FOWLER WHITE, ATTORNEYS AT LAW
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1 A. Twenty-one.

2 Q. Very good.

3 What we're going to do today is we're going
4 to take what's know as a sworn statement from you. And
5 my court reporter just put you under oath. So all I want
6 you to do is tell the absolute truth today.

7 A. Right.

8 Q. I don't want you to color what you're
9 saying in any way. Really, the only thing that will be
10 of any use to anyone is if you just tell the absolute
11 truth.

12 A. Right.

13 Q. So those are the instructions, okay?

14 A. Okay.

15 Q. All right. And sometimes -- I've been
16 doing this for a lot of years and sometimes I talk like a
17 lawyer too much, and if you don't understand what I'm --

18 A. That's your job.

19 Q. I guess. But if you don't understand what
20 I'm saying at some point, just say, "Jack, say it in
21 English," and I'll make it better for you. Okay?

22 A. Okay.

23 Q. So tell me how you first met Jeffrey
24 Epstein.

25 A. [REDACTED] introduced me to him.



1 Q. And [redacted] was a friend of yours at the
2 time?
3 A. Yes.
4 Q. Okay. And tell me a little bit about the
5 introduction, how [redacted] introduced you to Jeffrey.
6 A. Well, she told me that I could go over
7 there and give him a massage --
8 Q. Okay.
9 A. -- and he'd pay me for it and that he was a
10 respectful guy.
11 Q. Okay. So let's break that down a little
12 bit.
13 She told you you could go over there to
14 Jeffrey Epstein's house and give a massage?
15 A. Right.
16 Q. When she said go give a massage did she
17 tell you what she meant by that?
18 A. Just are -- no. Just a massage. She didn't
19 really give me any details.
20 Q. Okay. Let me ask it to you another way.
21 A. Okay.
22 Q. Was there any suggestion that what you were
23 being offered the opportunity to do would be sexual in
24 any way?
25 A. No.

1 A. No.
2 Q. And she didn't e-mail you about that?
3 A. No.
4 Q. She didn't send you a text message like you
5 guys do?
6 A. No.
7 Q. Okay. She just simply saw you in person
8 one day and said, "Do you want to go over to
9 Mr. Epstein's house and do a massage?"
10 A. Yes.
11 Q. And I take it you said okay and you went
12 over there?
13 A. Yes.
14 Q. All right. Now at the time that you went
15 over there, you were not yet 18, but you were almost 18?
16 A. Yes.
17 Q. You were within a couple of months of being
18 18 years old?
19 A. Yes, I do believe so.
20 Q. Okay. And what did [redacted] tell you about if
21 asked, how old you should tell anyone you were when you
22 went over to his house?
23 Was that a bad question?
24 A. Repeat that.
25 Q. Sure. Okay.

1 Q. Okay. So as far as you understood it and
2 as far as what [redacted] told you, you would be going over to
3 Mr. Epstein's house and just giving him a normal
4 therapeutic massage?
5 A. Right.
6 Q. Okay. And I assume [redacted] told you you would
7 be paid for it?
8 A. Yes.
9 Q. Did she tell you how much you would be
10 paid?
11 A. Yes. Two hundred.
12 Q. Okay. When was the first time that you
13 went to Jeffrey Epstein's house? Was it after you spoke
14 to Alex?
15 A. Yes.
16 Q. Okay. And the first time that you went to
17 Mr. Epstein's house, that was in response to [redacted]
18 talking to you in person. In other words, she said --
19 you saw her somewhere, be it at the store that you worked
20 at or around the neighborhood, she said to you in person,
21 "Do you want to go over to Jeffrey Epstein's house?"
22 Right?
23 A. Uh-huh.
24 Q. She didn't call you on the telephone and
25 offer you the opportunity?

1 Before you went over to Jeffrey's house
2 after you met Alex in person, did she tell you if anyone
3 asked you how old you were, how old you were supposed to
4 say you were?
5 A. Yes.
6 Q. What did she tell you?
7 A. Yes. She told me to say that I was 18 if
8 it was asked.
9 Q. She didn't give you a script and say as
10 soon as you walk in the house you're supposed to say,
11 "I'm 18," right?
12 A. No.
13 Q. She just said that if anyone ever asked,
14 you should say that you were 18 years of age.
15 A. Right.
16 Q. And I assume if you were asked, you wanted
17 to be convincing that you were over the age of 18,
18 because you wanted to do the work, right?
19 A. Right.
20 Q. By the way, were you ever asked?
21 A. Eventually.
22 Q. Okay.
23 A. Not the first day, I don't believe.
24 Q. Okay. Was it Jeffrey or someone else that
25 asked you whether you were over the age of 18?



1 A. It was probably Jeffrey. I don't remember
 2 very clearly.
 3 Q. Whoever asked you, though, you clearly said
 4 when asked, "I'm 18."
 5 A. Uh-huh.
 6 Q. And you were very believable in saying that
 7 you were over 18?
 8 A. Yes.
 9 Q. Okay. Now the first time that you went to
 10 Jeffrey's house did you give him a massage that day?
 11 A. Uh-huh.
 12 [REDACTED] Answer yes or no so the
 13 record is clear.
 14 THE WITNESS: Yes. Okay.
 15 (Discussion held off the record.)
 16 BY MR. GOLDBERGER:
 17 Q. Okay. So you go to Jeffrey's house and you
 18 meet him and you're going to do a massage that day,
 19 right?
 20 A. Yes.
 21 Q. Now were you -- you were not forced to give
 22 a massage, correct?
 23 A. No.
 24 Q. You were not forced to do anything that you
 25 didn't want to do?

1 A. Right.
 2 Q. No one coerced you or threatened you in any
 3 way?
 4 A. No way.
 5 Q. No one offered you any drugs to do a
 6 massage?
 7 A. No.
 8 Q. No one offered you any alcohol to do a
 9 massage?
 10 A. No.
 11 Q. And prior to going over to Jeffrey's house
 12 the first time there was no e-mail message from him?
 13 A. No.
 14 Q. In any way?
 15 A. No way.
 16 Q. There was no text mail message from him?
 17 A. No.
 18 Q. There was no fax from him?
 19 A. No.
 20 Q. Okay. And the same questions: There was
 21 no e-mail from anyone that worked for Jeffrey before you
 22 went over there?
 23 A. No.
 24 Q. No text messages from anybody?
 25 A. No.

1 Q. The reason you went there is because [REDACTED]
 2 told you in person --
 3 A. Yes.
 4 Q. -- that if you wanted to -- it was all
 5 voluntary on your part -- you could go to Jeffrey's house
 6 and give him a massage.
 7 A. Right.
 8 Q. Okay. So did Alex tell you what to expect
 9 when you went there, as far as keeping your clothes on or
 10 taking your clothes off?
 11 A. She did say that he may ask me to take my
 12 clothes off and that he was very respectful about that
 13 and that if I didn't feel comfortable about it that I
 14 didn't have to.
 15 Q. All right.
 16 A. It was no problem. He wouldn't be upset.
 17 Q. All right. So Alex told you there would be
 18 no pressure on you whatsoever?
 19 A. Right.
 20 Q. You simply did what you wanted to do?
 21 A. Yes.
 22 Q. And if you didn't want to do something, you
 23 were free to say, "No. I don't want to do it"?
 24 A. Yes.
 25 Q. All right. And in your experiences with

1 Mr. Epstein, by the way, was there ever a time when that
 2 didn't play out, when he tried to force you to do
 3 something that you didn't want to do?
 4 A. He never tried to force me to do anything.
 5 Q. If you said no to something, whatever that
 6 might be, he would respect that?
 7 A. Yes.
 8 Q. All right.
 9 Now the first time that you went there do
 10 you remember whether you gave Jeffrey a massage with your
 11 clothes on or your clothes off?
 12 A. At the beginning, it was with all my
 13 clothes on.
 14 Q. Uh-huh.
 15 A. But the most that -- I mean I was still in
 16 my bra and panties.
 17 Q. Okay. The whole time?
 18 A. Yes.
 19 Q. Right.
 20 A. I'm pretty sure, yes.
 21 Q. Did you see during that massage -- did he
 22 try and touch you in any way during that massage?
 23 A. No.
 24 Q. Did he use any kind of device on you in any
 25 way during that massage?

Page 13

1 A. No.
2 Q. Do you know -- he was wearing a towel
3 through that massage?
4 A. Yes.
5 Q. Do you know whether he touched himself in
6 any way, his penis or anything like that, during the
7 massage?
8 A. Yeah, like towards the end.
9 Q. Okay. Do you know whether he masturbated?
10 A. Oh, my gosh.
11 Q. If you don't know, you don't know.
12 A. I mean probably, but I don't know. I can't
13 remember exactly. It was so long ago.
14 Q. Okay. There was nothing that you were
15 uncomfortable with in this massage?
16 A. No. Yeah. And like I said, he also, you
17 know, reassured if I wasn't comfortable with anything,
18 then just tell him and --
19 Q. He would stop?
20 A. -- that would be the end of it.
21 Q. Okay. Now after that first time you met at
22 Jeffrey's house, you left. And did there come other
23 times that you went to Jeffrey's house?
24 A. Yes.
25 Q. And how would that occur? How would that

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1 happen?
2 A. Sara, one of his assistants, would call me
3 and ask me if I would like to come over and give a
4 massage, because he would be in town.
5 Q. So would it be primarily Sara that would
6 call or would there be others?
7 A. Most of the time.
8 Q. And would it be a message that would be
9 left for you or would it be you would talk to Sara or one
10 of the other as assistants directly?
11 A. I mean generally it would be directly.
12 Q. Okay.
13 A. Unless I didn't answer my phone.
14 Q. And if I think I understand what you're
15 saying, you would talk to Sara or another assistant and
16 they would say, "Listen, Jeffrey's going to be in town.
17 Would you like to come over and give a massage?" Right?
18 A. Yes.
19 Q. Was there ever any suggestion in any of
20 those phone calls where you made arrangements to go to
21 Jeffrey's house that there would be anything sexual that
22 would occur at the house?
23 A. No.
24 Q. Was it always if there was a phone call,
25 that this was whether you wanted to come and give a

Page 15

1 massage or not?
2 A. Yes, it was always that.
3 Q. Okay. And there was never any discussion,
4 "Well, we really want you to come over because we want
5 you to have sex with Jeffrey," or anything like that?
6 A. Right. No way.
7 Q. Never, ever suggested, right?
8 A. No.
9 Q. Okay. The only thing that ever occurred on
10 any of these phone calls was, "Are you willing to come
11 over," or, "Would you like to come over and give a
12 massage?"
13 A. Right.
14 Q. Okay. And the phone calls from Jeffrey --
15 well, you never spoke to Jeffrey on the phone, right?
16 A. No.
17 Q. Okay. The phone call from Sara or any
18 other assistant would always -- it would be sporadic,
19 right? They always said, "Jeffrey's going to be in town.
20 Do you want to come over this afternoon at four o'clock?"
21 A. Yeah, yeah. It wasn't --
22 Q. There was nothing regular about it?
23 A. No.
24 Q. Okay. Other than Sara, who else would have
25 called you to ask whether you wanted to come over and

Page 16

1 give a massage?
2 A. If it wasn't Sara, then I believe Adriana,
3 maybe one other person I don't know the name of. Just --
4 I mean it was mostly Sara. And Adriana I spoke to a time
5 or two.
6 Q. Okay. Now when you would go over to
7 Jeffrey's house after getting a phone call, you would go
8 and you'd go to give him a massage, right?
9 A. Yes.
10 Q. And occasionally would there be more than a
11 massage that occurred?
12 A. It happened a few times.
13 Q. Okay. And the few times that it happened,
14 though, it was very sporadic and it was nothing that was
15 planned?
16 A. No way.
17 Q. It just occurred?
18 A. Right.
19 Q. So it wasn't like there was a phone call,
20 you know, "Today we want you to come over and do more
21 than just a massage with Jeffrey?"
22 A. Right.
23 Q. When anything more occurred you'd be over
24 there and it would be totally voluntary on your part?
25 A. Yes; definitely consensual.





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1 Q. Okay. Now when we're talking about more
 2 than just a massage, what sort of conduct are we talking
 3 about that might have occurred?
 4 A. It was probably mostly -- maybe not, not
 5 particularly oral, but, I mean there's just random
 6 things, but not sex.
 7 Q. Okay. So let's put it into perspective.
 8 You certainly never had intercourse with him, right?
 9 A. No.
 10 Q. And did you actually ever really have oral
 11 sex with him?
 12 A. Maybe once or twice. I barely even
 13 remember that.
 14 Q. Okay.
 15 A. I mean it was all just mostly --
 16 Q. I'm sorry. Mostly what?
 17 A. Mostly like hand oriented.
 18 Q. Okay. So on occasion you would touch his
 19 penis with your hand?
 20 A. It's happened a few times.
 21 Q. Okay. And anytime that occurred it would
 22 be totally voluntary on your part?
 23 A. Yes.
 24 Q. Consensual on your part?
 25 A. Yes. He would never make me do anything.

Page 18

1 Q. And it would just be totally random and it
 2 would occur during the moment?
 3 A. Uh-huh.
 4 Q. Okay. There was nothing that was planned
 5 in advance concerning that?
 6 A. No.
 7 Q. And it didn't become every time you went
 8 over there that would happen, right?
 9 A. Yeah. No.
 10 Q. No, no. I mean just you would go over and
 11 give a massage one day and the phone call would be the
 12 same, "Do you want to come over and give a massage," and
 13 maybe --
 14 A. Yes.
 15 Q. -- maybe another time you would get a phone
 16 call, "Do you want to come over and give a massage," and
 17 just because of the day it was or whatever was going on,
 18 it may have gone a little further where they may have
 19 been some touching, correct?
 20 A. Right.
 21 Q. And then the next time you could go over
 22 there and it could have been a regular massage again,
 23 right?
 24 A. Uh-huh.
 25 Q. Okay. So the point that I guess I'm trying

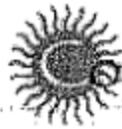
Page 19

1 to make was that there were never phone calls that would
 2 come to you and they would say, "Do you want to come over
 3 and give a massage," and you just assumed it would be to
 4 go have sex? That was not the case?
 5 A. No.
 6 Q. Never, never, never, right?
 7 A. Yes.
 8 Q. All right. There were times when you would
 9 be away and not be in Palm Beach and -- I mean you very
 10 much thought that Jeffrey was your friend? You treated
 11 him as a friend?
 12 A. Yes, definitely. I felt that he was my
 13 friend.
 14 Q. And there were times when maybe you were
 15 out of town and for whatever reason, you found yourself
 16 in a situation where you needed some money, correct?
 17 A. Yes.
 18 Q. Okay. And you felt that the relationship
 19 was such that you could call Jeffrey and it never had
 20 anything to do with a massage or anything. You would
 21 say, "Listen, I could use a couple of dollars. I have a
 22 problem."
 23 A. Yes.
 24 Q. And would he ever hesitate to help you out?
 25 A. No.

Page 20

1 Q. And in fact, did he not tell you that,
 2 listen -- he would talk to you about life and about --
 3 A. Yes.
 4 Q. -- about what you wanted to do with your
 5 life?
 6 A. Yes.
 7 Q. And he said, "If you ever find yourself in
 8 trouble, you have a friend in me and you can give me a
 9 call?"
 10 A. Yes.
 11 Q. Okay. If you had to guess -- and
 12 recognizing that there can be no accuracy here -- if you
 13 had to guess, how many times do you think you went over
 14 to Jeffrey's house?
 15 A. I would say at least five, less than ten.
 16 Q. Okay. I think that's kind of a fair range.
 17 And during those five to ten times that you
 18 went there, was there ever anything uncomfortable, in
 19 your mind, that occurred over at Jeffrey's house?
 20 A. No.
 21 Q. Okay. I know we've touched on this, but
 22 just Lilly, the detail person, makes sure that we get
 23 everything. After you met Jeffrey the first time did you
 24 ever talk to him on the telephone about arranging a
 25 massage or anything like that?





Page 21

1 A. No.

2 Q. Okay. And you never e-mailed him or

3 anything like that?

4 A. No, no.

5 Q. Never text-messaged him?

6 A. No.

7 Q. Okay. Now at times when you would go over

8 to give a massage, Jeffrey, while he was getting the

9 massage, would be preoccupied doing a lot of things,

10 right?

11 A. Yes, very often.

12 Q. He was a busy guy?

13 A. Yes.

14 Q. He would be on the telephone talking to

15 folks while you were giving a massage?

16 A. Yes. Sometimes it would be just a massage

17 and he'd be pretty much doing business the whole time.

18 Q. Right. Certainly it wasn't sex or anything

19 like that?

20 A. No.

21 Q. He would be doing business and you'd be

22 massaging him?

23 A. Yes.

24 Q. Okay. Give me one second.

25 (Discussion held off the record.)

Page 23

1 Q. Okay. I assume, based on what you're

2 telling me, Jeffrey didn't know at the time that it was

3 your 18th birthday. He must have --

4 A. No. It was kind of like -- it was my 19th

5 birthday.

6 Q. Okay. And you made it pretty clear to him

7 that it was your 19th birthday and not your 18th

8 birthday?

9 A. Yeah. I tried not to like even touch upon

10 that.

11 Q. But I know you didn't try and touch upon

12 it --

13 A. Yes.

14 Q. -- but was it clear to him, based on what

15 you know, that he thought it was your 19th birthday?

16 A. Yes.

17 Q. Okay. Great.

18 Here's the lawyer talking now.

19 I didn't try to influence you in any way to

20 say anything, did I?

21 A. No.

22 Q. In fact, all I asked you to do is tell me

23 the absolute truth here today?

24 A. Yes.

25 Q. And that's what you've done?

Page 22

1 BY MR. GOLDBERGER:

2 Q. Every time you went back to Jeffrey's house

3 you went back there because you wanted to, right?

4 A. Uh-huh, yes.

5 Q. No one -- certainly Mr. Epstein never tried

6 to persuade you or induce you or entice you or coerce you

7 to engage in any kind of sex?

8 A. No.

9 Q. And no one representing Jeffrey Epstein

10 ever tried to persuade or induce you to engage in sex?

11 A. No.

12 Q. All right. And I think you told me when we

13 first started talking that you were very, very close to

14 your 18th birthday, and when asked, you in fact said you

15 were 18 and tried to be very, very convincing of that.

16 A. Yeah. I didn't mean that -- all I said was

17 I was 18.

18 Q. Okay.

19 A. Like there was no ifs, ands or buts about

20 that.

21 Q. There was a time when there was a concert

22 or a show down in Fort Lauderdale and Jeffrey got you

23 tickets to go to that show because it was your birthday,

24 right?

25 A. Correct.

Page 24

1 A. Yes.

2 Q. Okay. And you've understood all my

3 questions, have you?

4 A. Yes.

5 MR. GOLDBERGER: Okay. I thank you very

6 much for coming in today and it really made it

7 much easier for us to do it this way. So thanks a

8 lot.

9 (Thereupon, the sworn statement was

10 concluded at 4:20 p.m.)

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