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1 PROCEEDINGS
 2 ---
 3 (Continued from Volume I.)
 4 VIDEOGRAPHER: We're back on the video record.
 5 This is the beginning of tape number three. The
 6 time is 3:02 p.m.
 7 BY MR. KUVIN:
 8 Q. Okay. Let me do it this way, so we can just
 9 back up a little bit.
 10 Ms. [REDACTED], you're aware that girls, including
 11 my client, have sued Jeffrey Epstein in civil lawsuits,
 12 correct?
 13 A. Yes.
 14 Q. All right. Are you also aware that one of the
 15 defenses has been that these girls volunteered to go to
 16 the house so, therefore, what are they complaining
 17 about? Are you aware of that?
 18 A. Yes, I am.
 19 Q. Okay. You feel that way yourself?
 20 A. Absolutely.
 21 Q. Because you volunteered to go, right?
 22 A. Absolutely.
 23 Q. And you haven't sued Mr. Epstein, have you?
 24 A. I have no intentions of that.
 25 Q. Did you contemplate it at one point?

1 On behalf of the Witness:
 2 DOUGLAS MCINTOSH, ESQUIRE
 3 CAMILLE E. BLANTON, ESQUIRE
 4 MCINTOSH, SAWRAN, PELTZ & CARTAYA, P.A.
 5 1601 Forum Place
 6 Suite 1110
 7 West Palm Beach, Florida 33401
 8 Phone: [REDACTED]
 9 ALSO PRESENT:
 10
 11 MICHAEL DOWNEY, VIDEOGRAPHER
 12
 13
 14
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1 A. Did I contemplate it? Yeah, it crossed my
 2 mind a few times.
 3 Q. Why?
 4 A. Because I just thought it was the easy way
 5 out. And then I decided this is my life and I have to
 6 take responsibility for my own actions because I did
 7 volunteer. So I'm handling my grief and my situation a
 8 different way, and that's by putting this shit behind
 9 me.
 10 Q. Got you. Fair enough.
 11 What I'm wondering then -- and the reason I
 12 asked the question initially was not to embarrass or
 13 harass you. But since even yourself, you think to a
 14 certain extent that these girls bear their own
 15 responsibility for going?
 16 A. They don't bear any responsibility. They need
 17 to take responsibility.
 18 Q. Got you. Did your dad tell you that?
 19 A. No. I've learned that.
 20 Q. What was his response to you about what
 21 happened then? That's why I asked the question
 22 initially.
 23 MS. BLANTON: We are not going to discuss her
 24 father and mother and relatives or any other
 25 friends' reactions to these lawsuits or what she's

1 been through. Again, she's not a Plaintiff. She's
2 not a Defendant. We're not going to do it.

3 The only purpose that serves is to upset her
4 and you've seen that.

5 MR. KUVIN: I certainly don't mean to upset
6 her, but obviously I'm representing certain
7 individuals who are being -- prosecuting their
8 action. And I think that the questions are
9 relevant. But if you're not going to let her
10 answer, then we'll move on.

11 BY MR. KUVIN:

12 Q. As you sit here today, did anyone blame you,
13 other than yourself, for what happened?

14 MR. CRITTON: Form.

15 THE WITNESS: Yes.

16 BY MR. KUVIN:

17 Q. Who?

18 A. A lot of people.

19 Q. Who? Who can we talk to that blamed you,
20 other than your own personal feelings?

21 A. My sister.

22 Q. Okay. Who else?

23 A. It's the only person that I care about that
24 blamed me.

25 Q. Well, anyone that didn't -- that you don't

1 A. Yes.

2 Q. As you sit here today, do you think that the
3 money that he's paid you and the fact that he's paying
4 for your lawyers when your parents couldn't afford it
5 anymore affects your testimony in any way?

6 A. Absolutely not. That's ridiculous.

7 Q. Okay. Fair enough. Fair enough.

8 Do you think it was right for Mr. Epstein,
9 personally, to have underage girls, girls under the age
10 of 16 come to his house and give him naked massages?
11 You think that was okay?

12 MR. CRITTON: Form.

13 THE WITNESS: I don't know.

14 MS. BLANTON: Object to form. Define okay.

15 BY MR. KUVIN:

16 Q. Well, personally. I mean, do you think there
17 was anything wrong with that, personally?

18 MR. CRITTON: Form.

19 THE WITNESS: I don't know.

20 BY MR. KUVIN:

21 Q. You have no opinion about that?

22 MS. BLANTON: She's answered that twice.

23 MR. CRITTON: Form. Argumentative, if that
24 was a question.

25 BY MR. KUVIN:

1 care about?

2 A. I think a lot of the other Plaintiffs blame
3 me.

4 Q. Okay. Do you feel any personal responsibility
5 for any -- bringing any of those girls to the house?

6 MR. CRITTON: Form. Asked and answered.

7 THE WITNESS: Can you repeat the question?

8 BY MR. KUVIN:

9 Q. Yeah. You said just now that you think some
10 of the other girls that you brought blame you?

11 A. Uh-huh.

12 Q. Correct?

13 A. Yes.

14 Q. Do you --

15 A. Do I blame myself?

16 Q. Yeah, for bringing them.

17 A. Absolutely not.

18 Q. Not at all?

19 A. No.

20 Q. If Mr. Epstein were not paying for your
21 lawyers, think you'd feel the same way?

22 A. I would feel this way, no matter what.

23 Q. If Mr. Epstein hadn't paid you in excess of
24 \$3,000 over the years, do you think you'd feel the same
25 way?

1 Q. You got no opinion about that?

2 A. I have no opinion about that.

3 Q. Okay. Do you remember the address of
4 Mr. Epstein's home?

5 A. No, I do not.

6 Q. Does the name Brillo Way sound familiar to
7 you?

8 A. Brillo Way sounds familiar.

9 Q. Did you ever take a shower in Mr. Epstein's
10 shower?

11 A. No.

12 Q. When you were at Mr. Epstein's house, did the
13 chef ever prepare you guys lunch as you were there?

14 MR. CRITTON: Form.

15 THE WITNESS: I don't remember.

16 BY MR. KUVIN:

17 Q. Any one of the girls that you brought to the
18 home, did any of those girls ultimately go to [REDACTED]
19 University, as far as you know?

20 A. Yes.

21 Q. Who?

22 A. Jane Doe 4.

23 Q. And I apologize, but is she the one that you
24 had heard had sex with Mr. Epstein?

25 MR. CRITTON: Form.

1 MS. BLANTON: I'm sorry. Did you --
 2 BY MR. KUVIN:
 3 Q. There was one of the girls that you had heard
 4 had sex with them?
 5 A. That was [REDACTED], and I heard that from Jane Doe
 6 101.
 7 Q. Okay. Sorry.
 8 What did Jane Doe 4 do with him, if you know?
 9 A. I don't.
 10 Q. Did you ever tell anyone that you worked for
 11 Jeffrey?
 12 A. Did I tell anyone I worked for Jeffrey?
 13 Q. Yes.
 14 A. Yes.
 15 Q. Who?
 16 A. The girls.
 17 Q. What did you mean by that when you said you
 18 worked for Jeffrey?
 19 A. Worked for Jeffrey, like, got girls to give
 20 him massages. When I was introduced to a girl, I would
 21 be, like, yeah, I work for Jeffrey. I find girls to
 22 give him massages.
 23 Q. Okay. You weren't on any kind of a payroll or
 24 anything, right?
 25 A. No.

1 Q. So all of the girls that you brought actually
 2 recruited other girls as well?
 3 A. Yes.
 4 MR. CRITTON: Form.
 5 BY MR. KUVIN:
 6 Q. Okay. How do you know that?
 7 A. I know that because they told me.
 8 Q. Okay. Which one of them?
 9 A. Jane Doe 7 brought [REDACTED]. Jane Doe 4 brought
 10 [REDACTED]. Jane Doe 3 brought a couple girls, can't recall
 11 their names. [REDACTED], I think, may have brought somebody,
 12 but I can't be accurate on that. And I don't know for
 13 sure, but I think Jane Doe 7. may have also brought
 14 [REDACTED].
 15 Q. Okay.
 16 A. [REDACTED] and [REDACTED], the sisters.
 17 Q. So now we're talking about around 12 girls
 18 that you brought. And then as far as you know, a lot of
 19 those, if not all of them, brought other girls, at least
 20 one or two other girls?
 21 MR. CRITTON: Form.
 22 BY MR. KUVIN:
 23 Q. Is that -- did I understand you correctly?
 24 A. Yes, you do.
 25 Q. So as you sit here today, how many girls are

1 Q. Did you ever bring a girl over with the
 2 initials [REDACTED].?
 3 A. I'm sorry. What were the initials?
 4 Q. [REDACTED].
 5 A. No, not that I can remember. Not that I can
 6 recall, no.
 7 Q. Do you know a girl by the name of [REDACTED].?
 8 A. No.
 9 Q. Doesn't sound familiar to you?
 10 A. [REDACTED].?
 11 Q. Yes.
 12 A. Does not sound familiar at all.
 13 Q. How about [REDACTED].?
 14 A. [REDACTED].
 15 Q. Does the name sound familiar to you at all?
 16 [REDACTED] as a girl that went over to Mr. Epstein's home at
 17 some point?
 18 A. I've heard that name come up a few times.
 19 Q. Do you remember bringing a [REDACTED] over to the
 20 house?
 21 A. I never brought a [REDACTED] over to the house.
 22 Q. Of any of the girls that you brought, do you
 23 know if any of those girls then did similar to you in
 24 getting other girls?
 25 A. All of them.

1 you aware of that were brought to Mr. Epstein's home?
 2 A. That I'm aware of?
 3 Q. Well, yeah, either that you brought or that
 4 you know other people brought. I mean, you've already
 5 talked to us about 12. Then where there's -- if they
 6 each brought them, then we're talking 12 more, plus some
 7 of them may have brought additional ones. You know,
 8 simple math, we're in the twenties now. How many are
 9 you aware of -- let me strike the statement.
 10 How many people are you aware of, either
 11 directly or indirectly, girls that were brought to
 12 Mr. Epstein's home?
 13 MR. CRITTON: Form.
 14 THE WITNESS: At least 20.
 15 BY MR. KUVIN:
 16 Q. At least?
 17 A. At least 20.
 18 Q. Could it be at least 30?
 19 A. I don't know.
 20 MR. CRITTON: Form.
 21 THE WITNESS: I don't want to speculate.
 22 BY MR. KUVIN:
 23 Q. But through either firsthand knowledge, in
 24 addition to secondhand knowledge from the girls
 25 themselves, you're aware of at least 20?

1 A. At least.
 2 Q. Okay. And of those girls, other than the one
 3 girl that we've talked about before that was 24 years
 4 old, as you sit here today, all those girls were under
 5 age 18; is that correct?
 6 MR. CRITTON: Form.
 7 THE WITNESS: That I know of, yes.
 8 BY MR. KUVIN:
 9 Q. And the only one you're aware of that was over
 10 that age of 18 was [REDACTED]?
 11 A. At 23, yes.
 12 Q. Did Jane Doe 101 ever tell you how she first
 13 heard about Mr. Epstein?
 14 A. No, she did not.
 15 Q. What I'm trying to understand is, at some
 16 point it seemed like, according to your testimony, that
 17 there were a number of girls from [REDACTED] High
 18 School that were going over to Mr. Epstein's home during
 19 this period of time in 2005, early 2006.
 20 What I'm trying to figure out is, if you know,
 21 how did Mr. Epstein or his people get entree into your
 22 high school initially; in other words, who was the first
 23 person at [REDACTED] High School, if you know,
 24 that started this whole thing?
 25 MR. CRITTON: Form.

1 THE WITNESS: I have no idea. I do not know.
 2 It wasn't me.
 3 BY MR. KUVIN:
 4 Q. Right. Because Jane Doe 101 got you?
 5 A. Jane Doe 101 got me, that's correct.
 6 Q. And I'm sorry. I know I asked this before.
 7 But Jane Doe 101, she was a classmate of yours at [REDACTED]
 8 [REDACTED]?
 9 A. No. I went to [REDACTED] with her.
 10 Q. Okay.
 11 A. Her, [REDACTED]. We weren't friends, didn't hang out.
 12 Just saw each other through the hallways.
 13 Q. Well, that's interesting then.
 14 Are you the first girl, that you're aware of,
 15 from [REDACTED] High School that went to Mr. Epstein's
 16 home?
 17 MR. CRITTON: Form.
 18 THE WITNESS: No.
 19 BY MR. KUVIN:
 20 Q. Who was the first girl that you were aware of
 21 from [REDACTED] that went there?
 22 A. [REDACTED].
 23 Q. And how did you become aware of her going?
 24 A. When I started going and I started bringing
 25 girls that I was friends with, acquaintances with,

1 whatever, at [REDACTED], word got around campus. And
 2 then girls that I were bringing were, like, yeah, I know
 3 so and so and she did that, like, ninth grade. But it's
 4 hearsay.
 5 Q. I understand. [REDACTED], how much older than you
 6 was she?
 7 A. My age.
 8 Q. She was your age?
 9 A. She's my age now.
 10 Q. Well then, she would have been your age then?
 11 A. Yeah.
 12 Q. Right?
 13 A. Yeah.
 14 Q. Okay. Unless she's got a time machine that we
 15 don't know about.
 16 A. She might.
 17 Q. You had heard that she went in ninth grade?
 18 A. That is what I heard.
 19 Q. Who did you hear that from?
 20 A. Multiple people.
 21 Q. Are you aware, other than her, of anyone else
 22 that went over to Jeffrey's house before you that was
 23 going to [REDACTED]?
 24 A. Yes.
 25 Q. Who else?

1 A. [REDACTED].
 2 Q. When did she go?
 3 A. I don't know if she ever worked for him or
 4 gave him a massage, but she was -- she's been to his
 5 house.
 6 [REDACTED].
 7 Q. Okay.
 8 A. [REDACTED] or [REDACTED] (phonetics), I
 9 think.
 10 Q. Okay. Who else?
 11 A. On top of my head, that's all I can think of.
 12 Q. Do you know how to spell [REDACTED]?
 13 A. [REDACTED]?
 14 Q. [REDACTED].
 15 A. [REDACTED].
 16 Q. And [REDACTED], is it [REDACTED] or [REDACTED]?
 17 A. [REDACTED].
 18 Q. And [REDACTED]? How do you spell [REDACTED]?
 19 A. [REDACTED].
 20 Q. Other than [REDACTED] and [REDACTED], anyone else
 21 from [REDACTED] that you're aware of that went over
 22 there?
 23 A. [REDACTED].
 24 Q. [REDACTED]?
 25 A. [REDACTED].

1 Q. [REDACTED]
 2 A. [REDACTED]
 3 Q. Who else?
 4 A. That's it, that I can think of on the top of
 5 my head that went before I even heard about him.
 6 Q. Were you all at school talking about going
 7 over to this old guy's house on the beach?
 8 MR. CRITTON: Form.
 9 BY MR. KUVIN:
 10 Q. I mean, were there any conversations that were
 11 had around the hallways at school about this issue?
 12 MR. CRITTON: Form.
 13 THE WITNESS: I had no idea that they had even
 14 gone until after I met Epstein and was already done
 15 with my situation.
 16 BY MR. KUVIN:
 17 Q. Right.
 18 A. So this is information that I've learned in
 19 the last three years --
 20 Q. Okay.
 21 A. -- that I hadn't known before.
 22 The girls and the friends that I hung around
 23 with, they would all talk about it in the hallways
 24 because they knew that I was taking them or that they
 25 met him through me.

1 Q. Right.
 2 A. But if you mean communication through
 3 different cliques in the hallway, as, like, an issue,
 4 no, nobody ever spoke about it.
 5 Q. Okay. All the girls that you took, what was
 6 their, I guess for lack a better term, social status
 7 within the school? I mean, were they popular girls?
 8 Were they not popular girls? Were there, you know, I
 9 mean, in some schools there are, like, the cheerleaders
 10 and the different groups?
 11 A. Should I be brutally honest?
 12 MR. HOROWITZ: I'm going to object to the form
 13 then.
 14 BY MR. KUVIN:
 15 Q. Yes. Brutally honest.
 16 A. Do you want to include myself in this?
 17 Q. Let's keep you out of it for the moment.
 18 A. Okay. [REDACTED] was the party animal.
 19 [REDACTED] and [REDACTED] and, I believe, [REDACTED] were the
 20 cheerleaders.
 21 Q. Okay.
 22 A. Jane Doe 7 and Jane Doe 4 were the promiscuous
 23 ones.
 24 [REDACTED] was -- [REDACTED], not promiscuous, but
 25 more flirtatious.

1 [REDACTED] was just -- I don't even know what
 2 category I can put her under.
 3 Jane Doe 3 was definitely promiscuous.
 4 I don't really have a category to put [REDACTED]
 5 under. She was just kind of the younger one, the not so
 6 bright one.
 7 Q. Got you. When you would ask girls to go,
 8 would you look for the ones you thought were more
 9 promiscuous?
 10 MR. CRITTON: Form.
 11 THE WITNESS: No. No.
 12 BY MR. KUVIN:
 13 Q. How would you decide which ones to ask?
 14 A. They were my friends, the girls that I went to
 15 school with, the ones that I kicked it with after
 16 school. They were in my circle. It was convenient.
 17 Q. Okay. Call me naive, but how do you convince
 18 a girl that age to go to an old man's house, even just
 19 to give a massage?
 20 MS. BLANTON: Object to the form. Go ahead.
 21 I think you were handling the answer just fine.
 22 MR. CRITTON: Form.
 23 BY MR. KUVIN:
 24 Q. Go ahead.
 25 A. That's the thing. I didn't have to convince

1 them.
 2 Q. What do you mean?
 3 A. I didn't convince anything. I proposed to
 4 them. They took it. They volunteered.
 5 Q. Okay.
 6 A. Sometimes the girls would come up to me and
 7 ask me if they can work for him this weekend. There was
 8 no convincing needed.
 9 Q. Right. So you would just mention it and --
 10 A. They jumped on it, just like I did.
 11 Q. Then why did it bother you when you did it the
 12 first time?
 13 A. It bothered me more so because I just -- I
 14 can't explain it to you. It didn't bother me then as it
 15 bothered me now. It bothers me now for different
 16 reasons.
 17 Q. Well, do you think you were any less sensitive
 18 than these girls?
 19 A. I am definitely less sensitive than those
 20 girls.
 21 Q. You see yourself as being more sensitive than
 22 them?
 23 A. At times, yes. At other times, no. I'm a
 24 very hard person. Everybody's sensitive when they want
 25 to be. You strike somewhere where it hurts, you're

1 going to be sensitive. You're going to fall.
 2 Q. And this whole issue with Epstein obviously is
 3 a sensitive point with you?
 4 A. It is.
 5 Q. Did [REDACTED] like the fact that [REDACTED] went over
 6 there, if you know?
 7 A. I don't know.
 8 Q. Did you ever hear that he was upset about you
 9 bringing [REDACTED]?
 10 A. We did have a falling out.
 11 Q. After you brought [REDACTED]?
 12 A. After I brought [REDACTED]. When he found out that I
 13 was going to bring her, yeah, he distanced himself from
 14 her and me.
 15 Q. Do you know why?
 16 A. No.
 17 Q. Did you hear that he actually punched a wall
 18 he was so upset?
 19 MR. CRITTON: Form.
 20 BY MR. KUVIN:
 21 Q. Did someone tell you that?
 22 A. No.
 23 Q. Have you talked to him since?
 24 A. We're not as close.
 25 Q. Have you talked to him at all since?

1 BY MR. HOROWITZ:
 2 Q. Hi. Good afternoon. My name is Adam
 3 Horowitz, as I mentioned when we started today.
 4 A. Okay.
 5 Q. I represent seven of the Plaintiffs. I'm
 6 going to be asking you some questions, sort of filling
 7 in some blanks in my mind based on the previous
 8 questions and also some particular questions about my
 9 clients. Okay?
 10 Sort of at the beginning of the deposition you
 11 told us that Jane Doe 101 first mentioned Jeffrey
 12 Epstein's name to you at the [REDACTED] Beach Resort; is
 13 that right?
 14 A. That is correct.
 15 Q. Before that time, you had never heard of him;
 16 is that right?
 17 A. That's right. I had never heard of him
 18 before.
 19 Q. But you know now that certain [REDACTED]
 20 classmates of yours were already going to his house?
 21 A. That's correct.
 22 Q. Did Jane Doe 101 ever tell you that she,
 23 herself, had gotten paid for giving Mr. Epstein a
 24 massage or was she simply a recruiter for him?
 25 A. We never discussed that.

1 A. Yes.
 2 Q. Did you talk to him about this incident?
 3 A. No. It's not a conversation that me and him
 4 have had. It's not a conversation that I would like to
 5 have with him.
 6 Q. Is that the only reason you can think of that
 7 you two had a falling out?
 8 A. Yes.
 9 Q. When you were in the room with Mr. Epstein,
 10 did you actually see his genitals?
 11 A. I don't remember. I tried not to look.
 12 Q. Okay. So as you sit here today, you couldn't
 13 describe them?
 14 A. No. I could not describe them for you.
 15 Q. I don't mean obviously his face. I'm talking
 16 about his genitals. You could not describe those?
 17 A. I could not describe his genitals for you.
 18 Q. Okay. Did you ever talk to [REDACTED]'s parents?
 19 A. No.
 20 MR. KUVIN: All right. I appreciate it.
 21 That's all the questions I have at this point.
 22 Other attorneys, I'm sure, are going to have some
 23 for you.
 24 (Discussion held off the record.)
 25 CROSS EXAMINATION

1 MR. CRITTON: Form.
 2 BY MR. HOROWITZ:
 3 Q. Do you -- as we sit here today, do you know of
 4 anything that took place when Jane Doe 101 went to
 5 Jeffrey's house?
 6 A. No.
 7 Q. Do you know if she ever gave him a massage?
 8 A. No, I don't.
 9 Q. Do you know if they ever had sexual contact?
 10 A. No, I do not.
 11 Q. And you told us that Jane Doe 101 did not
 12 forewarn you that Jeffrey Epstein would touch you in a
 13 sexual manner; is that correct?
 14 MR. CRITTON: Form.
 15 THE WITNESS: That's correct.
 16 BY MR. HOROWITZ:
 17 Q. Did she ever say that he would touch your
 18 private parts?
 19 A. No. He never did -- she never did.
 20 Q. She never told you that?
 21 A. Sorry.
 22 Q. Did you ever tell her that, in fact, he had
 23 touched you, as you said, below the belt in the front?
 24 MR. CRITTON: Form.
 25 THE WITNESS: I don't remember.

1 BY MR. HOROWITZ:
 2 Q. You don't know if you ever told her that?
 3 A. I don't know if I ever told her that.
 4 Q. Was it upsetting to you that she didn't tell
 5 you that that might occur?
 6 A. I don't remember.
 7 Q. Are you, as we sit here today, upset -- if she
 8 knew -- strike that.
 9 If she knew that Jeffrey Epstein had a sexual
 10 interest in girls, would you have liked to have known
 11 that before you went to his house?
 12 MR. CRITTON: Form.
 13 THE WITNESS: I don't know.
 14 BY MR. HOROWITZ:
 15 Q. That might be something you didn't care about
 16 before you went to his house?
 17 A. I don't know how to answer that. I don't
 18 know. I'm not being put in that position.
 19 Q. Well, was it upsetting to you when he touched
 20 you in a sexual manner and you had no idea he was going
 21 to do that?
 22 A. I don't know. I can't recall my feelings at
 23 that point in time.
 24 Q. And you don't recall whether you ever told her
 25 what had taken place?

1 going to touch you in a sexual manner?
 2 MR. CRITTON: Form.
 3 THE WITNESS: Yes.
 4 BY MR. HOROWITZ:
 5 Q. Now, you -- do you know if she recruited other
 6 girls to go to Jeffrey's house?
 7 A. I don't know.
 8 Q. Has she ever told you that she recruited other
 9 girls to go to Jeffrey's house?
 10 A. I can't remember.
 11 Q. Have you heard from anyone that Jane Doe 101
 12 recruited other girls to go to Jeffrey's house?
 13 A. Nobody said anything, no.
 14 Q. As we sit here today, are you aware -- is it
 15 your understanding that you are the only person that she
 16 recruited or do you have some other fountain of
 17 information?
 18 A. To my knowledge, I'm the only girl that she
 19 recruited.
 20 Q. And when she recruited you, did she talk about
 21 the range of girls that Jeffrey preferred?
 22 A. No.
 23 Q. Did she indicate to you at any point how long
 24 it is that she was -- had been recruiting for Jeffrey
 25 Epstein?

1 A. I don't know if I ever told her.
 2 Q. Now, when you got done with this
 3 massage/touching encounter, you went downstairs and you
 4 saw her on the first floor of the house?
 5 MR. CRITTON: Form.
 6 BY MR. HOROWITZ:
 7 Q. Is that right?
 8 A. I went downstairs. I don't know if she came
 9 up and got me or if I met her down there, but she was
 10 waiting for me with [REDACTED], yes.
 11 Q. And then you proceeded to ride home --
 12 A. Together.
 13 Q. Together? Did you tell her any of the events
 14 that had taken place upstairs in the massage room?
 15 A. I can't recall.
 16 Q. Do you think she should have told you that
 17 Jeffrey Epstein was going to touch you in a sexual
 18 manner?
 19 A. Should she have?
 20 MR. CRITTON: Form.
 21 THE WITNESS: I don't know. Yes.
 22 BY MR. HOROWITZ:
 23 Q. Well, which is it, I don't know or yes? I'll
 24 ask the question again so it's clear.
 25 Should she have told you that Jeff Epstein was

1 A. No, she did not.
 2 Q. And you told us that when you recruited for
 3 Jeffrey Epstein, you told the girls that you worked for
 4 Jeffrey; is that correct?
 5 A. Yes.
 6 Q. Did she make a similar pitch to you, I work
 7 for Jeffrey and I'd like you to come for a massage?
 8 A. I can't remember.
 9 Q. Okay. Turning your attention to the encounter
 10 when you were in the massage room with Jeffrey. When
 11 Jeffrey Epstein reached below your belt in the front, as
 12 you described it, did you push him away?
 13 A. I pushed his hand away.
 14 Q. You pushed his hand away.
 15 Did you, like, move away as well?
 16 A. I don't remember.
 17 Q. Was that your -- was that your indication to
 18 him that you were uncomfortable with what it is he was
 19 doing?
 20 A. Yes.
 21 Q. What I'm trying to get at is, that's why you
 22 pushed him away, to indicate to him you didn't want him
 23 to touch you that way?
 24 A. That's correct.
 25 Q. In a sexual way?

1 A. That's correct.
 2 Q. Did he continue masturbating after you told
 3 him -- after you pushed his hand away?
 4 MR. CRITTON: Form.
 5 THE WITNESS: Yes.
 6 BY MR. HOROWITZ:
 7 Q. And you -- did you hear him, like, breathing
 8 heavy?
 9 MR. CRITTON: Form.
 10 THE WITNESS: I can't remember.
 11 BY MR. HOROWITZ:
 12 Q. Was he masturbating, like, with his hand on
 13 his penis?
 14 A. Yes.
 15 MR. CRITTON: Form.
 16 BY MR. HOROWITZ:
 17 Q. And had you looked that way, would his
 18 genitals have been exposed?
 19 A. Yes.
 20 Q. And did he suddenly stop masturbating, as in,
 21 when someone has a climax or orgasm?
 22 A. Yes.
 23 Q. You distinctly recall that?
 24 A. Yes.
 25 Q. At the conclusion of this encounter in the

1 Q. He said what?
 2 A. He had just made a comment about her age when
 3 he was paying me. He just made a comment, like, you
 4 know, she was old.
 5 Q. Meaning, the previous girl --
 6 A. Yes.
 7 Q. -- was old?
 8 Did Jeffrey -- now, you told us that the range
 9 of the other girls you brought was between ages 14 and
 10 17; is that about right?
 11 A. Besides [REDACTED], that's right.
 12 Q. Did Jeffrey Epstein ever express displeasure
 13 with the 14 to 17 year old girls that you brought?
 14 A. I don't know.
 15 Q. I'm just asking, did he ever express it to
 16 you?
 17 A. He never expressed it to me.
 18 Q. Now, when you were bringing these girls over
 19 to Jeffrey Epstein's house, did you believe that these
 20 girls were going over to Epstein's house so that Epstein
 21 could have sexual contact with them?
 22 A. I don't know.
 23 Q. Now -- go ahead.
 24 A. I don't know. I never directly stated
 25 anything about sexual contact.

1 massage room, you told us, I think, that Jeffrey Epstein
 2 asked you to bring other girls. Did I get that right?
 3 A. Yes.
 4 Q. What was your response?
 5 A. I told him, okay.
 6 Q. You were comfortable with that?
 7 A. Yes.
 8 Q. And did you tell him, I'll be in touch, or
 9 anything along those lines?
 10 A. I don't remember.
 11 Q. But by then you already had [REDACTED] number,
 12 telephone number?
 13 A. At some point I had [REDACTED] number. I don't
 14 recall if it was before or after the massage.
 15 Q. Okay. All right. Now, you told us that you
 16 on one occasion brought an older girl named [REDACTED]; is
 17 that right?
 18 A. That is right.
 19 Q. Was it Jeffrey Epstein who told you she was
 20 too old?
 21 A. Yes.
 22 Q. And did he tell you that when you arrived in
 23 the first floor of the house or after the massage or
 24 when did that conversation take place?
 25 A. The next girl I brought.

1 Q. I got that. I'm not asking what you said.
 2 But in your own mind, when you're bringing these girls
 3 over, did you think in your own mind, these girls are
 4 going over to Epstein's house and Epstein is going to
 5 have some type of sexual contact with them, the same way
 6 he did with me?
 7 MR. CRITTON: Form.
 8 THE WITNESS: I don't know.
 9 BY MR. HOROWITZ:
 10 Q. It didn't cross your mind that --
 11 A. I don't know what crossed my mind seven years
 12 ago.
 13 Q. Okay. Did you believe that you were being
 14 paid cash to bring over girls to Epstein's house for
 15 sexual pleasure?
 16 A. No.
 17 MR. CRITTON: Form.
 18 BY MR. HOROWITZ:
 19 Q. What did you think the purpose of the money
 20 that you were getting was?
 21 A. To introduce him to girls for massages.
 22 Q. For massages?
 23 A. Yes.
 24 Q. You thought that a reason that you were
 25 getting paid \$200 was for an untrained high school girl

1 to give a grown man just a massage?
 2 A. Yes.
 3 Q. I'm trying to -- was there a part of your
 4 mindset that thought, I'm also going to get paid for
 5 giving -- for bringing girls to give Epstein sexual
 6 pleasure?
 7 A. I didn't receive any sexual pleasure, so I
 8 can't make that analysis.
 9 Q. I'm not asking about your sexual pleasure.
 10 I'm asking about Epstein's sexual pleasure.
 11 Was there a part -- was there a part of your
 12 mind that said, I'm getting paid hundreds of dollars to
 13 bring young, attractive girls to Jeffrey's house so that
 14 he can have sexual pleasure? Did that cross your mind?
 15 A. No, it did not.
 16 Q. As we sit here today, looking back on the
 17 large sum of money that Jeffrey paid you, thousands of
 18 dollars, would you agree that he paid you that money so
 19 you could bring girls for his sexual pleasure?
 20 MR. CRITTON: Form.
 21 THE WITNESS: I don't know. No. No.
 22 BY MR. HOROWITZ:
 23 Q. Well, in your estimation, what do you think
 24 was the reason he paid you thousands of dollars?
 25 A. For a massage, for me to introduce him to

1 bit wiser, in your opinion were you paid thousands of
 2 dollars for Jeffrey Epstein to get sexual pleasure from
 3 14 to 17 year old girls?
 4 MR. CRITTON: Form.
 5 THE WITNESS: No.
 6 BY Mr. HOROWITZ:
 7 Q. Did Jeffrey Epstein tell you in particular,
 8 specifically, I want these girls over because they're
 9 good masseuses, that they really improve my back?
 10 A. No, he never said that.
 11 Q. And to your knowledge, is there a single girl
 12 that you brought over that Jeffrey Epstein did not have
 13 an orgasm with?
 14 A. Yes.
 15 MR. CRITTON: Form.
 16 BY MR. HOROWITZ:
 17 Q. There's some girls that he did not achieve
 18 climax?
 19 A. Yes.
 20 MR. CRITTON: Form.
 21 BY MR. HOROWITZ:
 22 Q. Are there any girls that you're aware of that
 23 he didn't touch or try to touch in a sexual manner?
 24 A. No.
 25 MR. CRITTON: Excuse me. Form to the last

1 girls to give him a massage.
 2 Q. Through your different conversations with
 3 Jeffrey Epstein, you've come to know that he's a very
 4 affluent man. I mean, you've described him as a
 5 billionaire.
 6 MR. CRITTON: Form.
 7 THE WITNESS: Yes.
 8 BY MR. HOROWITZ:
 9 Q. Would you agree that if he wanted to, he could
 10 have the best masseuses in the world?
 11 MR. CRITTON: Form.
 12 THE WITNESS: Yes.
 13 BY MR. HOROWITZ:
 14 Q. And yet he wanted these masseuses, in
 15 particular, from 14 to 17 year old girls; is that
 16 correct?
 17 MR. CRITTON: Form.
 18 MS. BLANTON: Objection. You're asking her to
 19 speculate on what Jeffrey Epstein wanted or had in
 20 his mind. If you want to ask her a question about
 21 what he told her or what she communicated with him,
 22 that's fine.
 23 BY MR. HOROWITZ:
 24 Q. My question is: As you look back on it now,
 25 having, you know, being a few years older and a little

1 question.
 2 MR. HOROWITZ: Too late.
 3 BY MR. HOROWITZ:
 4 Q. How did --
 5 MR. CRITTON: Then you need to slow down.
 6 MR. HOROWITZ: You need to speed up, old man.
 7 BY MR. HOROWITZ:
 8 Q. How did you go about recruiting?
 9 MR. CRITTON: I'll smile.
 10 BY MR. HOROWITZ:
 11 Q. How did you go about -- how did you go about
 12 recruiting the girls that were in your social circle at
 13 [REDACTED] High School? Was it always
 14 face-to-face or was it ever telephone? E-mail? Text?
 15 A. Sometimes over the phone. Sometimes when I'd
 16 run into them in the hallways at school or hang out with
 17 them, so face-to-face, over the phone.
 18 Q. Would you always have these -- take a girl
 19 that you went to high school -- give me a name of
 20 somebody who you went to high school with.
 21 A. Jane Doe 4.
 22 Q. Okay. Jane Doe 4. When you spoke to Jane Doe
 23 4 and told her for the first time about Jeffrey Epstein
 24 and this opportunity, did you tell her -- was anybody
 25 else there when you told her?

1 A. I don't recall.
 2 Q. Did you tell her in person, by phone or how?
 3 A. I don't recall.
 4 Q. What about Jane Doe 7? Did you tell her --
 5 was it a one-on-one type of conversation?
 6 A. I really don't recall.
 7 Q. What about Jane Doe 2? Was that in person
 8 or --
 9 A. Jane Doe 2.
 10 Q. Do you recognize that name?
 11 A. I never brought her.
 12 Q. Jane Doe 3?
 13 A. Jane Doe 3, I don't recall.
 14 Q. You don't recall whether -- I didn't even ask
 15 a question. You don't recall whether it was in person
 16 or by telephone, anything of that sort?
 17 A. I don't recall how I told her.
 18 Q. But each of these girls, it was always, like,
 19 a private kind of one-on-one conversation or would you
 20 sort of announce it in the cafeteria or the classroom
 21 or...
 22 MR. CRITTON: Form.
 23 THE WITNESS: I don't think I ever announced
 24 it in the cafeteria, but I don't know.
 25 BY MR. HOROWITZ:

1 THE WITNESS: Yes.
 2 BY MR. HOROWITZ:
 3 Q. What would you say?
 4 A. I would just talk to them, hey, listen, you
 5 know, I know this guy, his name is Jeff, he's on the
 6 Island, he has a lot of money, he's a billionaire, you
 7 know, he's looking for girls to give massages. Are you
 8 interested?
 9 And then obviously if they were interested, I
 10 would go into a little bit more detail, you know,
 11 exchange dates and times that they were available.
 12 Q. And you would always clear those dates and
 13 times with [REDACTED] or somebody else?
 14 A. [REDACTED].
 15 Q. Am I correct in is all that you told the girls
 16 in regard to the services they had to render was that
 17 they were getting money for massages?
 18 A. I told them they would get \$200 for a massage.
 19 The more you do, the more you make.
 20 Q. Well, you told us earlier that they were
 21 getting paid for massages.
 22 A. They were getting paid for massages.
 23 Q. And that's what you told them?
 24 A. That is what I told them.
 25 Q. Thank you.

1 Q. Would you make an effort to have a private
 2 conversation about this subject?
 3 A. Depending. Depending on the girl.
 4 Q. Well, give me the, if you can, the variables.
 5 What would weigh in favor of making sort of a public or
 6 semi-public announcement about this and what would weigh
 7 in favor of having a private conversation?
 8 A. Well, with Jane Doe 4 it had to be private
 9 because if [REDACTED], her old boyfriend, found out, he
 10 would beat the crap out of her. So she was somebody
 11 that I went to privately.
 12 MR. HOROWITZ: Move to strike.
 13 THE WITNESS: Also, depending on what the
 14 girls were like, I mean, some are very jealous when
 15 it comes to money. It depends. The other girls
 16 didn't like it when they weren't working and the
 17 other girl was. So usually I probably had to just
 18 do it privately. A lot of them were very not
 19 wanting other girls to work for him.
 20 BY MR. HOROWITZ:
 21 Q. Did you -- did you have a standard sales
 22 pitch, so to speak, in recruiting these girls, like,
 23 what you would tell each of them in order to get them to
 24 go to Jeffrey Epstein's house?
 25 MR. CRITTON: Form.

1 You told us that you an understand -- a moment
 2 ago you told us that you had an understanding that the
 3 more girls did, the more they got; is that right?
 4 A. Yes.
 5 Q. Where did you come up with this understanding?
 6 A. Jane Doe 101 told me that, so I just passed it
 7 along.
 8 Q. Was that a theme that -- or a message that
 9 [REDACTED] also told you?
 10 A. No.
 11 Q. Did Jeffrey ever tell you that?
 12 A. No.
 13 Q. Did anybody who worked or was connected with
 14 Jeffrey tell you that?
 15 A. No.
 16 Q. So you took Jane Doe 101 at her word that the
 17 more -- the more the girls did, the more they got paid?
 18 A. That's correct.
 19 Q. And do you know if, in fact, that is a true
 20 statement?
 21 A. I don't know.
 22 Q. In terms of the more you get -- the more you
 23 do, the more you get paid, what were the -- on the low
 24 end of the scale, the less you did, the less you got
 25 paid, what would be the lesser activities?

1 A. The lesser activities? I don't know.
 2 Q. Well, -- and how much would you get paid on
 3 the lesser end?
 4 A. I don't know.
 5 Q. And then on the higher end, when you say the
 6 more you did, the more you got paid, what sort of things
 7 are we talking about?
 8 A. Whatever the girl allowed him to do or
 9 whatever their situation was. I don't know. I was
 10 never in the room with them. I just took what Jane Doe
 11 101 said and passed it down.
 12 Q. Well, did anyone ever say, well, what does
 13 that mean, the more you do, the more you get paid?
 14 A. Yes.
 15 Q. And how would you explain that?
 16 THE WITNESS: Didn't we already discuss this?
 17 The more you do, the more you make. If you
 18 were topless, if you were working in your thong,
 19 your bra, you're going to make more than a hundred,
 20 as to somebody who is always complaining about
 21 money and never takes off her shirt.
 22 BY MR. HOROWITZ:
 23 Q. So a hundred is the low end?
 24 A. You could say that.
 25 Q. What's the high end? If you really did a lot

1 of stuff with Jeffrey, what would you -- how much money
 2 could you make?
 3 MR. CRITTON: Form.
 4 THE WITNESS: I heard about 300.
 5 BY MR. HOROWITZ:
 6 Q. Three hundred. And what sort of sexual
 7 contact or nudity would you have to do to get that kind
 8 of money?
 9 MR. CRITTON: Form.
 10 THE WITNESS: I don't know. I wasn't in the
 11 room.
 12 BY MR. HOROWITZ:
 13 Q. And you just don't know from hearing it from
 14 other people?
 15 A. I don't know.
 16 Q. How would you know the -- you told us that
 17 [redacted] was always the person who gave you the dates and
 18 times for appointments. How would she communicate that
 19 to you?
 20 A. Can you repeat the question?
 21 Q. Yeah. If you were to recruit a girl and she
 22 was interested and you said you would tell her potential
 23 dates and time and things like that. How would you have
 24 that knowledge? How would you know available dates and
 25 times?

1 A. Either [redacted] would call me or I'd call [redacted]
 2 and we'd work it out to where when Jeffrey was coming
 3 home I would have a girl that would be available for
 4 those dates and times.
 5 Q. So you would -- you would get a heads up
 6 before he came into Florida?
 7 A. Uh-huh.
 8 Q. Yes?
 9 A. Yes.
 10 Q. Okay. And would [redacted] give you that
 11 information by telephone?
 12 A. Yes.
 13 Q. Would she call your home phone or cell phone?
 14 A. Cell phone.
 15 Q. And where would she be calling you from?
 16 A. I don't know.
 17 Q. Did you get the sense that she lived with
 18 Jeffrey?
 19 MR. CRITTON: Form.
 20 THE WITNESS: Yes.
 21 BY MR. HOROWITZ:
 22 Q. Would she call you from his home?
 23 A. I don't remember.
 24 Q. You told us or you told Mr. Kuvin that you
 25 told the girls to say that they were 18 years old?

1 A. Yes.
 2 Q. Can you specifically recall telling that to
 3 every one of the girls that you recruited?
 4 A. Yes.
 5 Q. And why would you tell them that?
 6 A. Jane Doe 101 told me to tell him that.
 7 Q. So you just --
 8 A. Jane Doe 101 told me. I passed it down.
 9 Q. Now, were you physically present when all of
 10 the girls went for their encounters with Jeffrey
 11 Epstein; meaning, were you upstairs in the massage room
 12 for any of them?
 13 A. No.
 14 Q. So would it be -- do you know if any of the
 15 girls, in fact, told Jeffrey Epstein, I'm 18?
 16 A. No.
 17 Q. Do you have -- I'm trying to work through this
 18 because we're getting late in the day.
 19 Did you get the same payout for each of the
 20 girls that you brought?
 21 A. What do you mean?
 22 Q. For a -- name a particular girl.
 23 A. Jane Doe 4.
 24 Q. Would you get paid \$200 for every girl that
 25 you brought?

1 A. Yes.
 2 Q. Were there any girls that you got paid less
 3 for?
 4 A. No.
 5 Q. Would you ever get paid more than 200 for
 6 bringing a girl?
 7 A. No.
 8 Q. Was your payout based on what Epstein did with
 9 the girls or what the girls did with Epstein?
 10 A. No.
 11 Q. It was just for sort of brokering the deal,
 12 getting them in the same place at the same time?
 13 MR. CRITTON: Form.
 14 THE WITNESS: Yes.
 15 BY MR. HOROWITZ:
 16 Q. If, for instance, a girl you recruited, just
 17 an example, say, Jane Doe 7. If she came ten times,
 18 would you get paid ten times or how did that work?
 19 A. If I -- sometimes I would get paid \$200 for
 20 every girl. Other times, for instance, if I was to
 21 bring Jane Doe 7 more than once, I might be able to
 22 sneak in and get paid more than once. But usually it
 23 was just 200 for every girl.
 24 Q. But there were sometimes in some -- in the
 25 case of some girls that you got paid more than once for

1 need a restroom break.
 2 MR. HOROWITZ: That's fine. I'm not holding
 3 anyone captive.
 4 VIDEOGRAPHER: Going off the record, 3:45.
 5 (Brief recess.)
 6 VIDEOGRAPHER: We're back on the video record.
 7 The time is 3:57.
 8 BY MR. HOROWITZ:
 9 Q. Have you ever been to Jeffrey Epstein's house
 10 when you were not there to give a massage or to bring a
 11 girl who was there to give a massage?
 12 A. No.
 13 Q. So every time that -- were you ever somewhere
 14 other than Jeffrey Epstein's house with Jeffrey Epstein?
 15 A. No.
 16 Q. So all of your contact, personal contact with
 17 him was at his house; is that right?
 18 A. Yes.
 19 Q. And it was always in the course of bringing --
 20 either going with Jane Doe 101 or bringing one or more
 21 girls?
 22 A. Yes.
 23 Q. Have you ever travelled with Jeffrey Epstein?
 24 A. No.
 25 Q. Have you ever travelled with someone who

1 that same girl?
 2 A. Yes.
 3 Q. Now, if one of the girls who you recruited in
 4 turn recruited another girl, would you get paid as well?
 5 A. I'm cut out of that deal.
 6 Q. You're cut out of the deal?
 7 A. Uh-huh.
 8 Q. Did you ever talk to Jeffrey or [REDACTED] about
 9 whether you should be included in that deal?
 10 A. No.
 11 Q. Were you always paid in cash?
 12 A. Yes.
 13 Q. And who gave you the money, like, physically
 14 handed you the money?
 15 A. Epstein.
 16 Q. While you were upstairs or while you were
 17 downstairs?
 18 A. I don't remember.
 19 Q. And would it -- would you get paid in front of
 20 the girls you had brought?
 21 A. No.
 22 Q. You would -- and would they get paid in front
 23 of you?
 24 A. Not that I can remember, no.
 25 MS. BLANTON: If you're at a good point, I

1 worked for him?
 2 A. No.
 3 Q. Have you ever been in a lawyer's office with
 4 Jeffrey Epstein?
 5 A. No.
 6 Q. Have you ever been in a vehicle owned or
 7 controlled by Jeffrey Epstein?
 8 A. No.
 9 Q. Have you ever been invited to travel with
 10 Jeffrey Epstein?
 11 A. No.
 12 Q. Did Jeffrey Epstein talk to you about
 13 properties that he owned?
 14 A. No.
 15 Q. Did he ever talk to you about businesses that
 16 he owned?
 17 A. No.
 18 Q. Did he ever talk to you about how he
 19 accumulated his wealth?
 20 A. Yes.
 21 Q. What sort of things would he tell you?
 22 A. He told me he was a scientist.
 23 Q. You're laughing.
 24 A. He did.
 25 Q. You know he's not a scientist?

1 MR. CRITTON: Form.
 2 THE WITNESS: Obviously I know that now.
 3 BY MR. HOROWITZ:
 4 Q. You know he's a child molester?
 5 MR. CRITTON: Form. Argumentative.
 6 BY MR. HOROWITZ:
 7 Q. Right?
 8 A. No, I do not know that.
 9 BY MR. HOROWITZ:
 10 Q. You know he touches underage girls for sexual
 11 pleasure?
 12 A. I don't know that.
 13 Q. You know he touched at least one girl for
 14 sexual pleasure, right?
 15 MR. CRITTON: Form.
 16 BY MR. HOROWITZ:
 17 Q. Yes?
 18 A. I don't know that.
 19 Q. Do you know if he -- well, you've told us he
 20 touched you for sexual pleasure, correct?
 21 A. Tried.
 22 MR. CRITTON: Form.
 23 BY MR. HOROWITZ:
 24 Q. I mean -- but he did touch you. You told the
 25 police that?

1 A. I don't even remember.
 2 Q. I'm going to ask the question again because
 3 there was -- I'm not sure there was an objection, just
 4 kind of an interruption, exactly.
 5 Other than a statement that you made in the
 6 police car regarding [REDACTED], what else did you
 7 discuss with the police when you were in the police car?
 8 MR. CRITTON: Let me just object to the form
 9 because she just said she couldn't talk about [REDACTED].
 10
 11 MR. HOROWITZ: Are you instructing her? I'm
 12 saying, other than.
 13 MR. CRITTON: Yeah, but you're trying to trick
 14 her into suggesting that maybe she did say [REDACTED].
 15 So you've got to be careful with your
 16 questioning. I think that was inappropriate.
 17 THE WITNESS: I don't even remember the ride.
 18 MR. HOROWITZ: If it was inappropriate --
 19 MR. CRITTON: I don't think it was
 20 intentional. I don't think it was intentional.
 21 Maybe you're too young to understand.
 22 BY MR. HOROWITZ:
 23 Q. Eliminate --
 24 MR. HOROWITZ: That's true.
 25 BY MR. HOROWITZ:

1 A. Yes.
 2 Q. And you know he masturbated while looking at
 3 you while you were 16 or 17 years old?
 4 A. Yes.
 5 Q. You were asked some questions by Mr. Kuvin
 6 about your travel in the police car. Do you recall
 7 those questions?
 8 A. Yes, I do.
 9 Q. Where were you going to? Where were you
 10 coming from and where were you going to?
 11 A. They picked me up at my house, took me down to
 12 the station and then they brought me home to my house.
 13 Q. So you're going -- this conversation that
 14 you've been talking about was in the --
 15 A. In the police car.
 16 Q. Going from the police station downtown to your
 17 home; is that right?
 18 A. That is right.
 19 Q. Okay. Other than any statement made in the
 20 police car regarding [REDACTED], which your attorney
 21 has already told you not to answer, what else did you
 22 discuss with the police?
 23 MR. BLANTON: I'm sorry. When?
 24 BY MR. HOROWITZ:
 25 Q. When you were in the vehicle.

1 Q. Exclude any conversation or non-conversation
 2 that you had regarding [REDACTED]. Put that out of
 3 your mind, if it at all ever occurred.
 4 Tell me about what else you discussed with the
 5 police in the police car.
 6 A. I don't remember.
 7 Q. Did you tell the police that Jeffrey Epstein
 8 admitted to you that he was a serial pedophile?
 9 MR. BLANTON: She just testified that she does
 10 not --
 11 MR. HOROWITZ: I'm trying to -- there's an art
 12 of questioning where you try and refresh people's
 13 recollection. You go with the general and then you
 14 narrow it to the specific.
 15 BY MR. HOROWITZ:
 16 Q. And, so, my question for you is: Did you tell
 17 the police that Jeffrey Epstein admitted to you that he
 18 was a serial pedophile?
 19 A. No, he never admitted that. That is absurd.
 20 Q. Did you tell -- did you tell the police that
 21 Jeffrey Epstein was a pedophile who paid you to bring
 22 girls for his sexual gratification?
 23 MR. CRITTON: Form.
 24 THE WITNESS: No, I did not tell the police
 25 that I told him he was a serial pedophile that paid

1 me for sexual acts or brought anybody or for sexual
 2 acts.
 3 BY MR. HOROWITZ:
 4 Q. Did you tell the police that Jeffrey Epstein
 5 had paid you thousands of dollars to bring 14 to 17 year
 6 old girls to his home so he could masturbate?
 7 MR. CRITTON: Form.
 8 THE WITNESS: I don't recall that.
 9 BY MR. HOROWITZ:
 10 Q. Did you tell the police that Jeffrey Epstein
 11 admitted sexually abusing Jane Doe 7?
 12 A. No, he didn't admit to sexually abusing Jane
 13 Doe 7.
 14 Q. Did you ever have a conversation with him
 15 about what took place with Jane Doe 7?
 16 A. No.
 17 Q. Did you ever have a conversation with Jeffrey
 18 Epstein about what took place between him and Jane Doe
 19 4?
 20 A. Yes.
 21 Q. Did you ever have a conversation with Jeffrey
 22 Epstein as to what took place between him and Jane Doe
 23 3?
 24 A. No.
 25 Q. Tell me everything that Jeffrey Epstein told

1 4 that Jeffrey Epstein said that she was one of his
 2 favorites?
 3 A. I don't remember.
 4 Q. Was she -- do you know -- strike that.
 5 How many times did you go to Jeffrey Epstein's
 6 house with Jane Doe 4?
 7 A. I don't recall.
 8 Q. Was it more than once?
 9 A. Possibly. I don't recall.
 10 Q. Was it at least once?
 11 A. At least once.
 12 Q. And you're not sure if it was more than once
 13 then?
 14 A. I'm not sure if it was more than once.
 15 Q. Do you have a specific recollection about what
 16 took place on the one occasion that you do recall?
 17 A. No.
 18 Q. Do you know whether you drove in a vehicle
 19 with her to Jeffrey Epstein's house on that occasion?
 20 A. I do remember an occasion me and Jane Doe 4
 21 being in a car driving and pulling up to Epstein's house
 22 in her mom's Buick.
 23 Q. In her mom's Buick. And who was driving?
 24 A. I don't remember.
 25 Q. And were you an older, younger or in the same

1 you about what he and Jane Doe 4 talked about or did
 2 together.
 3 A. All he said was that she was like day and
 4 night. She had this wild side to her and he had, like,
 5 a nickname of, like, [REDACTED] or some ridiculous thing
 6 like that. It's the only thing we discussed when it
 7 came to Jane Doe 4.
 8 Q. You also told us that she was one of his
 9 favorites, correct?
 10 A. Yes.
 11 Q. And another one of his favorites was [REDACTED]; is
 12 that right?
 13 A. Yes.
 14 Q. And thinking about the two of them when they
 15 were 16, 17 years old, did they share any common
 16 physical characteristics?
 17 A. No.
 18 Q. Do they resemble each other physically?
 19 A. No.
 20 Q. Nothing at all?
 21 A. No.
 22 Q. Did you ever ask Jeffrey Epstein what he meant
 23 when he said that Jane Doe 4 was one of his favorites?
 24 A. No.
 25 Q. Did you ever ask -- did you ever tell Jane Doe

1 grade as Jane Doe 4?
 2 A. I was in a grade above her.
 3 Q. Was she younger than you?
 4 A. That's right.
 5 Q. What grade was she in when you pulled up to
 6 Jeffrey Epstein's house with her?
 7 A. I don't recall.
 8 Q. Do you know if it was when she was in the
 9 ninth grade?
 10 A. No, I do not.
 11 Q. Do you know if it was when she was in the
 12 tenth grade?
 13 A. No, I do not.
 14 Q. Do you know if it was when she was in the 11th
 15 grade?
 16 A. No, I do not.
 17 Q. And what took place after you and Jane Doe 4
 18 arrived at Jeffrey Epstein's house?
 19 A. I don't remember.
 20 Q. Do you have a recollection of seeing her -- of
 21 her getting paid?
 22 A. No.
 23 Q. Do you have a recollection of you getting
 24 paid?
 25 A. No.

1 Q. Were you paid?
 2 A. I don't remember.
 3 Q. Do you know how long the two of you stayed at
 4 his house?
 5 A. No.
 6 Q. Do you know if anybody else was home or in
 7 Jeffrey Epstein's house when the two of you went?
 8 A. I don't recall.
 9 Q. Anything stand out or, you know, that you can
 10 recall, other than what you've told us about the day
 11 that you and Jane Doe 4 went to Jeffrey Epstein's house?
 12 A. It was cold out. We went out afterwards.
 13 Q. Anything else?
 14 A. (Nods head.)
 15 Q. Did -- no?
 16 A. No.
 17 Q. Did she tell you at any point what took place
 18 on that particular day?
 19 A. No.
 20 Q. Did you ask her?
 21 A. Yes.
 22 Q. And what did she say?
 23 A. I don't recall.
 24 Q. Was it a weekday or weekend?
 25 A. I don't know.

1 a vehicle together?
 2 A. Yes.
 3 Q. And had you scheduled this with [REDACTED]?
 4 A. Yes.
 5 Q. By telephone?
 6 A. Yes.
 7 Q. And who drove?
 8 A. I don't remember.
 9 Q. And when you arrived, what took place?
 10 A. I don't recall.
 11 Q. Do you recall how long you were there?
 12 A. No.
 13 Q. Do you recall getting paid for bringing Jane
 14 Doe 7?
 15 A. Yes.
 16 Q. Do you recall her getting paid?
 17 A. I don't remember.
 18 Q. Do you recall anything you told her about what
 19 you thought might take place?
 20 A. No, I don't remember.
 21 Q. Do you recall if she told you what it is that,
 22 in fact, did take place between her and Jeffrey Epstein?
 23 A. I don't remember.
 24 Q. Do you recall her going upstairs to the
 25 massage room?

1 Q. Given that you were in high school when you
 2 were recruiting these girls, was it fair to say you
 3 would always go after school or on the weekends when you
 4 went to Jeffrey Epstein's house?
 5 A. It would be fair to say that it was either
 6 after school or on the weekends.
 7 Q. Would you ever miss school or go during school
 8 to Jeffrey Epstein's house?
 9 A. No.
 10 Q. Did -- was Jeffrey Epstein familiar with your
 11 school schedule, such that he could schedule
 12 appointments after your school day ended?
 13 A. No.
 14 Q. Well, how is it -- how did it come to be that
 15 you would never get scheduled to come in during the
 16 school day?
 17 MR. CRITTON: Form.
 18 THE WITNESS: I don't know. It was usually
 19 the weekends.
 20 BY MR. HOROWITZ:
 21 Q. How many times did you take Jane Doe 7 to
 22 Jeffrey Epstein's house?
 23 A. I know for sure once, but I can't be positive
 24 anything else after.
 25 Q. Tell me how -- did the two of you ride over in

1 A. I don't remember.
 2 Q. Did you set up the massage table that day?
 3 A. Don't remember.
 4 Q. Did you wait downstairs while she was giving a
 5 massage?
 6 A. I don't remember.
 7 Q. Anything you do remember about the time you
 8 spent at Jeffrey Epstein's house with Jane Doe 7?
 9 A. No, I don't remember.
 10 Q. And you can't recall if it was more than once?
 11 A. I can't recall.
 12 Q. Are you aware whether or not she went more
 13 than once to his house?
 14 A. She did go more than once.
 15 Q. You know that because she told you or some
 16 other way?
 17 A. Because she told me.
 18 MR. CRITTON: We're on Jane Doe 7 now?
 19 MR. HOROWITZ: Yes.
 20 BY MR. HOROWITZ:
 21 Q. And briefly just going back to Jane Doe 4, are
 22 you aware whether or not she went more than once?
 23 A. She definitely went more than once.
 24 Q. And how do you know that? From her, Jeffrey
 25 or some other place?

1 A. Her, Jeffrey. Jane Doe 7 told me. [REDACTED]
 2 also told me a couple times.
 3 Q. And in the case of Jane Doe 4, would you have
 4 been paid your \$200 introductory fee once or more than
 5 once?
 6 A. I don't remember.
 7 Q. And what about with Jane Doe 7?
 8 A. I don't remember.
 9 Q. And next we're on to Jane Doe 3. Do you know
 10 how many times you were there at Jeffrey Epstein's house
 11 when she was also there?
 12 A. I took her once. Anything after that, I don't
 13 remember.
 14 Q. Go ahead.
 15 A. I went once to take her for a massage and then
 16 me and her brought another girl named [REDACTED]. So that's
 17 twice I know that she worked with him, once that me and
 18 her went together to take a girl. Other than that, I
 19 don't know if she went back, how many times or who she
 20 brought.
 21 Q. The day when you brought this other girl named
 22 [REDACTED] -- is that her name?
 23 A. Yes.
 24 Q. Was that a mutual friend of you and Jane Doe
 25 3?

1 THE WITNESS: I mean, there was -- the house
 2 was -- there was always people in the house,
 3 regardless if it was models, a chef, a chauffeur,
 4 butler, whatever. There was always somebody in the
 5 house.
 6 BY MR. HOROWITZ:
 7 Q. And do you recall ever talking to them?
 8 A. I'm sure I did.
 9 Q. Did anything -- do you remember any of the
 10 conversations you had or the subjects you talked about?
 11 A. No.
 12 Q. Did they ever feed you at that house?
 13 A. I've eaten there, yes.
 14 Q. Was it a meal you made yourself or someone
 15 made it for you?
 16 A. No.
 17 Q. Who made it for you?
 18 A. The chef.
 19 Q. Did you ever lay out at the pool?
 20 A. Not in a bathing suit. A girl upstairs was
 21 giving a massage and I was laying out by the pool in my
 22 clothes, just waiting for her to come downstairs. I
 23 wasn't doing it to get sun.
 24 Q. Getting paid while you were lying out at the
 25 pool?

1 A. It was more so Jane Doe 3's friend, but I had
 2 it to where me and her would split the profit.
 3 Q. That was my next question, who got the
 4 commission?
 5 A. We split it.
 6 Q. You split it. Okay.
 7 When [REDACTED] went -- did [REDACTED] go upstairs to the
 8 massage room?
 9 A. Yes.
 10 Q. Did you and Jane Doe 3 wait downstairs?
 11 A. I don't recall.
 12 Q. Do you recall anything about what you and Jane
 13 Doe 3 did while you were in Jeffrey Epstein's house
 14 while [REDACTED] was giving a massage?
 15 A. I don't remember.
 16 Q. Do you recall whether anyone was in the house,
 17 Jeffrey Epstein's house?
 18 A. I don't recall.
 19 Q. Thinking back on it, when you would bring
 20 girls over to Jeffrey Epstein's house and you would wait
 21 downstairs while the girl and Jeffrey Epstein went
 22 upstairs, was someone at his house watching you or
 23 looking after you to make sure you didn't get into
 24 trouble or take anything or --
 25 MR. CRITTON: Form.

1 A. Waiting for the girl to come downstairs, yes.
 2 Q. Did you ever go kind of snooping around the
 3 house, looking around to see the different rooms in the
 4 house?
 5 A. No.
 6 Q. Did [REDACTED] ever show you a datebook or
 7 appointment book?
 8 A. I don't remember.
 9 Q. Did she ever show you a calendar where you
 10 could sort of fit in your appointments?
 11 A. No.
 12 Q. Did she ever talk to you about having --
 13 keeping a datebook --
 14 A. No.
 15 Q. -- or a calendar with appointments?
 16 A. A calendar, no.
 17 Q. When -- did Jeffrey Epstein ever take pictures
 18 of you?
 19 A. Not that I know of.
 20 Q. When you went to his house, did you ever
 21 notice there was surveillance cameras?
 22 MR. CRITTON: Form.
 23 THE WITNESS: No, I did not know that.
 24 BY MR. HOROWITZ:
 25 Q. Did -- did Jeffrey Epstein have anyone that

1 you might characterize as a girlfriend or a partner?
 2 A. Somebody that I can characterize as?
 3 Q. Somebody that you -- that you sort of looked
 4 at and said, okay, that's his girlfriend?
 5 A. [REDACTED]
 6 Q. And what about their relationship led you to
 7 think that they were boyfriend/girlfriend?
 8 A. Just the way they were towards each other, how
 9 she always helped him out. She always set his
 10 appointments. There was one time -- I don't know if I
 11 was taking a girl upstairs or if it was my massage that
 12 I gave him -- but she was in the shower, coming out of
 13 the shower with him.
 14 Q. You were where?
 15 A. I don't know. I can't remember if I was
 16 bringing -- if I had brought a woman up there to give a
 17 massage or if I had -- was there to give him my massage.
 18 But either/or I do recollect her and Epstein coming out
 19 of the shower together.
 20 Q. Okay. Appearing as if they had showered
 21 together?
 22 A. That's correct.
 23 Q. And were they affectionate to each other?
 24 MR. CRITTON: Form.
 25 BY MR. HOROWITZ:

1 upstairs with one of the kids?
 2 MR. CRITTON: Form.
 3 THE WITNESS: I never heard anything.
 4 BY MR. HOROWITZ:
 5 Q. Is Jane Doe 7 someone that you considered a
 6 friend at the time that you recruited her to go to
 7 Jeffrey Epstein's house?
 8 A. Not necessarily a friend. A party buddy.
 9 Q. Social -- social acquaintance?
 10 A. Yes.
 11 Q. Someone that you had a good time with?
 12 A. Yes.
 13 Q. Is she someone that you would now go out and
 14 have a good time with?
 15 A. Never.
 16 Q. What took place between then and now -- well,
 17 let me back up.
 18 Do you not -- do you not like her at this
 19 point in time?
 20 A. I don't wish ill upon her.
 21 Q. My question is: Do you not like her?
 22 A. I don't like her.
 23 Q. What took place between then and now that you
 24 do not like Jane Doe 7?
 25 A. When [REDACTED] and I came home

1 Q. From your perspective did she appear to be
 2 affectionate?
 3 A. I don't recall.
 4 Q. Would they say the types of things or call
 5 each other, honey, sweetheart or anything like that?
 6 A. Not that I can remember.
 7 Q. Were they physically affectionate, meaning,
 8 sort of touch each other in a way that a
 9 boyfriend/girlfriend might touch their partner?
 10 A. Not that I saw.
 11 Q. Did they ever kiss?
 12 A. Not around me.
 13 Q. When Jeffrey Epstein, when you came to his
 14 house, would he ever kiss or embrace you when you saw
 15 him each time?
 16 A. No.
 17 Q. I mean, he would just say, hello?
 18 A. Yes.
 19 Q. I hate to do this, but try and think back to
 20 the day you were in his massage room and he's
 21 masturbating, his hand is on his penis. Is he groaning,
 22 making noises?
 23 A. I can't recall.
 24 Q. Did you ever hear Jeffrey Epstein groaning,
 25 making noises while you were downstairs and he was

1 in tears sobbing, I was very emotional. It was a very
 2 trying day for me. I had gone into my bedroom and I was
 3 throwing things. I was very upset.
 4 She came in and told me to put some clothes on
 5 and to come out drinking with her and [REDACTED]. And I
 6 just felt at that point in my life, I hit a low point
 7 and you are supposed to be my roommate, you're supposed
 8 to be my somewhat friend, acquaintance, we live
 9 together, you have no heart, you show no love to me
 10 after all these years and all you want me to do is go
 11 and get completely annihilated with you?
 12 Q. Is that the reason you don't like her anymore?
 13 A. That's one of the reasons.
 14 Q. I'm trying to get a full list or if there's --
 15 or however many reasons there are.
 16 What are the other reasons you don't like Jane
 17 Doe 7?
 18 A. She -- when me and her, we would go out and
 19 party sometimes, every guy I would talk to she would end
 20 up with at the end of the night. A lot of back
 21 stabbing. Her and Jane Doe 4 would go behind my back
 22 and talk very bad about me and say things and judge me,
 23 which friends don't do. That's why I classify her as a
 24 party buddy.
 25 Q. Okay.

1 A. Other than that, I don't have a personal
 2 vendetta against her.
 3 Q. Does anything -- I asked you if you don't like
 4 her and you said, yes. Does any of the reasons you
 5 don't like her have anything to do with Jeffrey Epstein?
 6 A. Yes.
 7 Q. I'm trying to get all these reasons out of
 8 you. Tell me all the reasons.
 9 A. She volunteered for this.
 10 Q. You don't like her for that reason?
 11 A. She volunteered for this. I didn't. I've
 12 paid a higher price than I feel she has. And everybody
 13 knew what they were getting themselves into prior to
 14 this.
 15 Why am I sitting here having to explain myself
 16 while you party it up?
 17 Q. You don't like her because she volunteered --
 18 A. To go.
 19 Q. -- to go to Jeffrey Epstein's house?
 20 A. That's correct.
 21 Q. Unlike you, who -- did you volunteer?
 22 A. I volunteered, too.
 23 Q. And would it be a fair statement you don't
 24 want her to get any money in this lawsuit; is that
 25 right? Because you don't like her?

1 this lawsuit because she's a bad -- you don't like her?
 2 A. I don't care. I don't care either way.
 3 MR. CRITTON: Form.
 4 BY MR. HOROWITZ:
 5 Q. You don't care either way.
 6 It would be okay with you if she gets millions
 7 of dollars for her pain and suffering?
 8 A. Sure.
 9 Q. What are all the reasons you don't like her?
 10 A. Oh, one of the guys I was dating she was
 11 sleeping with behind my back. Didn't find out until
 12 later. As well as her lies build up. When we were
 13 party buddies, like I said, her and Jane Doe 7 did a lot
 14 of scheming and scamming behind my back, a lot of lies.
 15 What else? We got into a fistfight my
 16 sophomore year of high school.
 17 She also told me that she was not suing
 18 Jeffrey Epstein and that she thinks Jane Doe 7 is a
 19 complete idiot and a moron and then goes behind my back
 20 thinking that I'm dumb and is a complete hypocrite.
 21 Q. Anything else?
 22 A. She lets men beat on her. That's why I don't
 23 like her.
 24 Q. You don't like her because men beat on her and
 25 she doesn't put up a fight?

1 A. I can't care either way.
 2 Q. You don't care whether she gets money?
 3 A. She's out of my life. That's all I know.
 4 Q. Would it be okay with you if she gets millions
 5 of dollars for the pain and suffering she endured?
 6 MR. CRITTON: Form.
 7 THE WITNESS: That's fine.
 8 BY MR. HOROWITZ:
 9 Q. Jane Doe 4. Is she someone that you
 10 considered a friend when you recruited her to go to
 11 Jeffrey Epstein's house?
 12 A. Party buddy.
 13 Q. Not a friend?
 14 A. Not a friend.
 15 Q. Never was a friend?
 16 A. Never was a friend.
 17 Q. Do you like her now?
 18 A. No.
 19 Q. You -- that's someone you really don't like?
 20 A. Don't like her.
 21 Q. You don't like her?
 22 A. I don't like her.
 23 Q. You see her, you go the other way?
 24 A. Oh, yes. High tail it.
 25 Q. And you don't want her to get any money in

1 A. She doesn't do anything. It's weak.
 2 Q. Any other reasons you don't like her? You've
 3 given us a few. I'm trying to find all of them.
 4 A. I can't think of any other reason why I
 5 wouldn't like her.
 6 Q. Who is the boyfriend that you said she was
 7 with?
 8 A. The guy I was dating at one point in my life,
 9 I was dating him, went to bed, woke up in the middle of
 10 the night and his pants were around the ankles in the
 11 kitchen with Jane Doe 4.
 12 Q. And who is that?
 13 A. [REDACTED]
 14 Q. And you said you had a fistfight with her.
 15 When was that? What grade was that?
 16 A. I don't recall.
 17 Q. Was it before or after you introduced her to
 18 Jeffrey Epstein?
 19 A. I can't remember.
 20 Q. It could have been before?
 21 A. Could have been before.
 22 Q. Did you patch up that issue, such that you
 23 were able to have a conversation and tell her how to
 24 make money and make yourself money?
 25 MR. CRITTON: Form.

1 THE WITNESS: We eventually patched things up.
 2 BY MR. HOROWITZ:
 3 Q. And do any of the reasons that you don't like
 4 Jane Doe 4 have anything to do with Jeffrey Epstein,
 5 other than, I think you told us she denied being a
 6 Plaintiff in the lawsuit?
 7 A. Yes.
 8 Q. What reasons are there pertaining to Jeffrey
 9 Epstein?
 10 A. Same thing as Jane Doe 7. You volunteered,
 11 you knew yourself what you were getting into. You were
 12 a hypocrite to my face, told me that it's stupid for
 13 Jane Doe 7 to sue. You disagree with her decision. You
 14 go behind my back, you do it. And then what? This is
 15 it? I don't -- I don't care for either one of them.
 16 Q. And, so, because of that, you don't think
 17 she's been harmed. You don't want to see her get any
 18 money because she volunteered for it; is that correct?
 19 MR. CRITTON: Form.
 20 MR. BLANTON: Object to form. She's asked and
 21 answered that before.
 22 THE WITNESS: I don't care either way.
 23 BY MR. HOROWITZ:
 24 Q. Is it your opinion that Jane Doe 4 should tell
 25 everyone that she's a Plaintiff in the lawsuit?

1 A. I found out, like, two days later.
 2 Q. That she what?
 3 A. Was a Plaintiff.
 4 Q. Do you know if at that point she had filed a
 5 lawsuit?
 6 A. Yes.
 7 Q. You know that because who told you?
 8 A. [REDACTED]
 9 Q. And, in fact, you knew when Jane Doe 4 lied --
 10 you knew when Jane Doe 4 told you that she wasn't a
 11 Plaintiff that she was a Plaintiff?
 12 MR. BLANTON: She's already answered that
 13 question.
 14 THE WITNESS: I already answered.
 15 BY MR. HOROWITZ:
 16 Q. Isn't it true you sent her a text message
 17 saying, I always knew you were a Plaintiff?
 18 A. Yes.
 19 Q. In fact, even when she told you she wasn't,
 20 you knew she was, correct?
 21 A. No.
 22 MR. BLANTON: She's answered that three times.
 23 BY MR. HOROWITZ:
 24 Q. But why would you send her an e-mail saying
 25 that, in fact, you knew she was?

1 A. No. But she shouldn't deny it.
 2 Q. She should answer truth -- she should answer
 3 to everyone that, in fact, she's a Plaintiff, if anybody
 4 asks her?
 5 A. Yes.
 6 Q. Did you know the answer before you asked her?
 7 A. No.
 8 Q. So you believed her when she said she wasn't a
 9 Plaintiff?
 10 A. Yes.
 11 Q. And it upsets you that she didn't want to tell
 12 you that she was a Plaintiff?
 13 A. No. It upsets me that she lied to my face and
 14 was fake to my face and told me one thing and then went
 15 behind my back and did another thing. That's scandalous
 16 and it's not right.
 17 Q. What's the other thing she did?
 18 A. She told me to my face that she wasn't a
 19 Plaintiff and that she disagreed. It's not the fact
 20 that she didn't want to tell me. She could have just
 21 said, it's not your business. But for her to lie to my
 22 face and then put down somebody else for the same thing
 23 you're doing is a little hypocritical.
 24 Q. Do you know if, in fact, she was a Plaintiff
 25 at the time she denied being a Plaintiff?

1 A. Because I wasn't going to let her have the
 2 satisfaction of thinking she threw me for a loop,
 3 thinking that she had one over me.
 4 Q. So she -- you lied to her?
 5 A. Yes.
 6 Q. You lied to her so that she wouldn't think
 7 that she got one over on you?
 8 A. Yes.
 9 Q. Okay. Jane Doe 3. Is she someone you can --
 10 at the time you recruited her, is she someone you
 11 considered a friend?
 12 A. No.
 13 Q. Was she ever a -- I think you called a
 14 party --
 15 A. Party buddy.
 16 Q. Party buddy?
 17 A. No.
 18 Q. Do you have any feelings for her one way or
 19 the other today different than when you did then?
 20 A. I have nothing bad or good to say about her.
 21 Q. Okay. Are you friends with anybody who you
 22 are aware of has filed a lawsuit against Jeffrey
 23 Epstein?
 24 A. No.
 25 MR. CRITTON: Object to the form. She may not

1 know.
 2 MR. HOROWITZ: That's the way I framed the
 3 question the way I did. I said, that you are --
 4 MR. CRITTON: Oh, okay.
 5 BY MR. HOROWITZ:
 6 Q. You told us that you have not communicated --
 7 have you communicated with Jeffrey Epstein since his
 8 arrest?
 9 A. No.
 10 Q. And how is it that you ended up with an
 11 attorney who he is paying for, if you have not
 12 communicated?
 13 MR. BLANTON: Object to the form. Do not
 14 answer that question.
 15 We've had this conversation. She will not be
 16 discussing that any further.
 17 BY MR. HOROWITZ:
 18 Q. You recall signing an affidavit in this
 19 lawsuit?
 20 A. Yeah. To be more specific, I've signed a lot
 21 of paperwork.
 22 Q. Do you recall signing, like, a sworn statement
 23 that said -- that detailed an encounter with a couple of
 24 the Plaintiffs? You met one at [REDACTED] and
 25 another one at another nightclub?

1 MR. HOROWITZ: We may have to deal with that
 2 one again.
 3 BY MR. HOROWITZ:
 4 Q. There was a girl named [REDACTED] who earned a
 5 thousand dollars from Jeffrey Epstein?
 6 MR. CRITTON: Form.
 7 THE WITNESS: What I heard.
 8 BY MR. HOROWITZ:
 9 Q. What you heard. Who recruited her?
 10 A. I have no idea.
 11 Q. Was she a [REDACTED] High School student?
 12 A. I have no idea. I know that she went to
 13 [REDACTED]. I don't know where she went to high
 14 school. She may have been [REDACTED].
 15 Q. And from -- sorry. From who did you hear that
 16 she earned a thousand dollars?
 17 A. Jane Doe 101.
 18 Q. Did Jane Doe 101 claim to have recruited [REDACTED]?
 19 A. I'm sorry?
 20 Q. Did Jane Doe 101 claim to have recruited [REDACTED]?
 21 A. No. She never said either way.
 22 Q. And what is -- can you -- I don't think you've
 23 spelled her last name for us.
 24 A. [REDACTED]?
 25 Q. Yeah.

1 A. I remember signing an affidavit about a
 2 Plaintiff and me at an incident that we had at
 3 [REDACTED], yes.
 4 Q. Did Mr. Epstein's attorneys ask you to sign an
 5 affidavit pertaining to those facts?
 6 MR. BLANTON: Do not answer that unless you
 7 know it somehow other than speaking to me. And I
 8 am your attorney. So if that aff -- if you had
 9 dealings with that affidavit outside of my
 10 presence, you may answer. Otherwise, you are not
 11 to answer that question.
 12 THE WITNESS: Okay.
 13 BY MR. HOROWITZ:
 14 Q. Did Mr. Epstein -- I'm not interested in what
 15 your attorneys said to you or asked you to do. Did
 16 Mr. Epstein's attorneys ask you to sign an affidavit?
 17 A. I don't know.
 18 Q. You just did it because it felt right? How
 19 did it come to be that you signed this affidavit?
 20 MR. BLANTON: If you can answer that without
 21 disclosing the conversations that you had with your
 22 attorney.
 23 THE WITNESS: I can't answer that.
 24 MR. BLANTON: That information is privileged.
 25 She will not be disclosing that.

1 A. [REDACTED].
 2 Q. And is he she older, younger, or the same?
 3 A. Same age.
 4 Q. Same grade, as far as you know?
 5 A. Yes.
 6 Q. Yes. Okay. How many times would you estimate
 7 that you have been to Jeffrey Epstein's home?
 8 A. Estimate?
 9 Q. Or if you know specifically, you can tell me.
 10 But I was trying to help you out.
 11 A. I don't know specifically. But if I'm telling
 12 you that I brought about a dozen girls and sometimes
 13 went more than twice, I think it would be fair to say
 14 maybe two dozen times, a dozen and a half to two dozen
 15 times maybe.
 16 Q. Eighteen to 24 roughly?
 17 A. Possibly.
 18 Q. That's your best estimate?
 19 A. Best estimation.
 20 MR. HOROWITZ: Let's take a break and I'll try
 21 to wrap it up and maybe Mr. Willits will have
 22 questions.
 23 VIDEOGRAPHER: Going off the record. The time
 24 is 4:25 p.m. This is the end of tape number three.
 25 (Brief recess.)

1 VIDEOGRAPHER: We're back on the record. The
 2 time is approximately 4:30 p.m. This is the
 3 beginning of tape number four.
 4 BY MR. HOROWITZ:
 5 Q. A few more questions.
 6 On the occasions when you travelled with other
 7 girls to see Mr. Epstein, before going to his home, did
 8 either you or any of the other girls use alcohol or
 9 drugs?
 10 A. I didn't.
 11 Q. Did any of the girls that you travelled with
 12 or recruited to see him use alcohol or drugs before
 13 going to his house?
 14 A. I don't know.
 15 Q. You were asked earlier whether Mr. Epstein
 16 gave you money or gifts before, other than the cash he
 17 gave you for the massages and bringing girls. And you
 18 said, none; is that correct?
 19 A. That is.
 20 Q. Did he pay for anyone to render any services
 21 for you?
 22 A. No.
 23 Q. Did he open any doors, whether it be
 24 employment opportunities or other opportunities for you?
 25 A. No.

1 Q. What was it in a general sense that you were
 2 journaling, if not your emotions and feelings?
 3 MS. BLANTON: Are you asking with regard to
 4 Jeffrey Epstein or her in general?
 5 MR. HOROWITZ: No.
 6 BY MR. HOROWITZ:
 7 Q. My question was: In a general sense, what is
 8 it that you were journaling or putting in a diary at
 9 that period of time?
 10 A. About things that were going on in my life,
 11 just things that I was going through that -- some didn't
 12 even have anything to do with Epstein and [REDACTED]. And
 13 sometimes I would just write about how I used to work
 14 for him and whatever. But it was never anything like
 15 emotional about him. It was more different things in my
 16 life.
 17 Q. If we were to open the pages of the journal,
 18 we would see somewhere a reference to the fact that you
 19 worked or used to work for him; it would say something
 20 like that?
 21 A. Possibly, yes.
 22 Q. Would it say something about how you felt
 23 about working for him or having worked for him?
 24 A. I don't know. Possibly.
 25 Q. What sort of things did you write about,

1 Q. Did he make offers to assist you in any way?
 2 Professionally? Educationally?
 3 A. No.
 4 Q. Anything like that?
 5 Did you ever ask Jeffrey Epstein for anything
 6 other than the cash you were given for the massage and
 7 the bringing of other girls?
 8 A. Sorry. No.
 9 Q. Did you ever keep a diary of the events, in
 10 terms of your dealings with Jeffrey Epstein?
 11 A. No.
 12 Q. Did you ever keep a journal or a log of the
 13 contacts you had with the police or the State Attorney
 14 or with [REDACTED], anything like that?
 15 A. I kept a journal for my own self about what
 16 was going on in my life, but nothing about [REDACTED] and
 17 Epstein specifically.
 18 Q. Would there be a reference to either what
 19 happened with Jeffrey Epstein or how you felt about it?
 20 A. No.
 21 Q. Would there be a reference to your emotional
 22 state or how you were feeling at or about the time that
 23 you went there or you were bringing other girls to his
 24 home?
 25 A. No.

1 having worked for Mr. Epstein?
 2 A. I don't know.
 3 Q. Would there be any reference to having worked
 4 for him in a sense of bringing other girls to his home?
 5 A. Possibly.
 6 (Brief interruption.)
 7 BY MR. HOROWITZ:
 8 Q. Where is this journal? Do you have it at your
 9 house?
 10 A. I do not have it at my house.
 11 Q. Who has your journal?
 12 A. The last place my journal was, was with my old
 13 roommates down in [REDACTED]. And I left a bunch
 14 of my belongings down there, so either it's thrown away
 15 or she still has it.
 16 Q. And who is "she?"
 17 A. [REDACTED]
 18 Q. [REDACTED] What is [REDACTED] last name?
 19 A. I do not know.
 20 Q. Where did you live with [REDACTED]?
 21 A. Down in [REDACTED] by the beach.
 22 Q. What street?
 23 A. I said by the beach. I don't know what
 24 street.
 25 Q. Did [REDACTED] go to [REDACTED] High School?

1 A. No.
 2 Q. Where did [REDACTED] go to high school?
 3 A. I don't know.
 4 Q. How did you know [REDACTED]?
 5 A. We worked together.
 6 Q. Where did you work together?
 7 A. We danced together.
 8 Q. Okay. And what dance club was that?
 9 A. A strip club.
 10 Q. And do you know [REDACTED] last name?
 11 A. No, I do not.
 12 Q. How long a period of time was it that you were
 13 a stripper?
 14 MS. BLANTON: I'm going to object, --
 15 MR. HOROWITZ: What?
 16 MS. BLANTON: -- based on earlier concerns.
 17 This is very private, personal information. With
 18 regard to how it relates to Jeffrey Epstein, if you
 19 have some sort of predicate or can explain the
 20 relevance, let me know. I think you have a right
 21 to ask [REDACTED] last name. She doesn't know it.
 22 You have a right to ask where the name of the place
 23 is if you want to try to find her.
 24 MR. HOROWITZ: Thank you. That wasn't a form
 25 objection.

1 A. You -- she tried out.
 2 Q. And then what happened? It didn't work out?
 3 A. She got the job, but she was only up there
 4 visiting, so she didn't keep it. She just wanted quick
 5 money.
 6 Q. What was the name of that club?
 7 A. [REDACTED].
 8 Q. What were the other clubs that you worked at?
 9 A. [REDACTED], [REDACTED], [REDACTED].
 10 [REDACTED], [REDACTED].
 11 Q. Are you currently working?
 12 A. Yes.
 13 Q. Where are you currently working?
 14 A. [REDACTED].
 15 Q. [REDACTED]?
 16 A. [REDACTED].
 17 Q. That's not a strip club?
 18 A. No, it's not a strip club.
 19 You've never heard of [REDACTED]? It's
 20 not a strip club.
 21 Q. What do you do at [REDACTED]?
 22 A. I serve. I wait tables.
 23 MR. CRITTON: You're not local. I take that
 24 back. You can only ask the question.
 25 BY MR. HOROWITZ:

1 BY MR. HOROWITZ:
 2 Q. Where did you dance?
 3 A. A lot of places.
 4 Q. Give me the names of the clubs that you worked
 5 as a stripper.
 6 MS. BLANTON: I'm going to object based on
 7 privacy. I do not think she needs to answer that.
 8 I don't think it has any relevance to this lawsuit.
 9 BY MR. HOROWITZ:
 10 Q. Did you work as a stripper with any of the
 11 girls who went to [REDACTED] High School?
 12 A. Not that I know of, no.
 13 Q. Did any of the girls who you brought to --
 14 A. Actually, I take that back. Jane Doe 4 came
 15 to visit me in [REDACTED] and I took her to the strip club
 16 I worked with up there and she stripped.
 17 Q. She went one time?
 18 A. Yes.
 19 Q. How long did she strip for?
 20 A. Maybe three hours and then we left the club.
 21 Q. It's your testimony she stripped for three
 22 hours?
 23 A. Yep. Yes.
 24 Q. And was she on, like, the payroll? She was
 25 hired by the -- by the strip club the day she went?

1 Q. How old were you when Jane Doe 4 came to see
 2 you at the strip club you were working at?
 3 A. In [REDACTED]?
 4 Q. Yes.
 5 A. I want to say that I was -- just turned 20.
 6 Q. And I'm gathering that since Jane Doe 4 came
 7 to visit you in [REDACTED], whatever arguments you had in
 8 high school, the fistfight, problems with the boyfriend
 9 or ex-boyfriend, you had kind of worked those things out
 10 by the time she came to visit you in [REDACTED]?
 11 MR. CRITTON: Form.
 12 THE WITNESS: Because of my living
 13 circumstances with Jane Doe 7, I put our
 14 differences aside as respect for my roommate.
 15 BY MR. HOROWITZ:
 16 Q. So Jane Doe 7 was your roommate in [REDACTED]
 17 while -- and she was going to school there?
 18 A. That's correct.
 19 Q. How did it come to be that you were no longer
 20 roommates with Jane Doe 7?
 21 A. [REDACTED]. After that
 22 everybody just split up. My parents wanted me to come
 23 home. This whole Epstein case had just blown up the
 24 same week [REDACTED]. They felt it would
 25 be more beneficial for my health that I come home and

1 deal with it as a family, instead of being in [REDACTED].

2 Q. How did it come to be when you came to live
3 with Jane Doe 7 in [REDACTED]?

4 A. I wanted out of [REDACTED]. I was unhappy
5 living at my home. I had just been interrogated by the
6 police about the whole Epstein situation. So I thought
7 it would be good to get out of [REDACTED] and start off
8 kind of fresh somewhere else. [REDACTED], which was Jane
9 Doe 7's roommate, said she wanted to move back home.
10 Her boyfriend wanted to as well. So I took her lease
11 over in the loft.

12 Q. What was the name of the strip club you worked
13 at with [REDACTED]?

14 A. [REDACTED]?

15 Q. [REDACTED]?

16 A. [REDACTED].

17 MR. HOROWITZ: Thanks. I don't have any
18 further questions at this point in time.

19 MR. CRITTON: Dick, you're on.

20 MR. WILLITS: Thank you very much.

21 CROSS EXAMINATION

22 BY MR. WILLITS:

23 Q. Mr. Kuvin has a picture that I would like for
24 him to show you now of a young lady.

25 MR. KUVIN: One of us does. Yeah. I'll hold

1 MR. KUVIN: I've given it to the witness,
2 Dick.

3 BY MR. WILLITS:

4 Q. Do you recognize that young lady?

5 A. No. But she kind of looks like that girl that
6 killed her kid on tv. What's her name? No. Cayley,
7 the whole Cayley Anthony. It resembles her, but I've
8 never seen this girl in my life.

9 Q. Okay. Thank you very much.

10 I want to change the subject and ask you:
11 When is the last time you talked to [REDACTED]?

12 A. Oh, it's been a very long time. Eighteen?
13 When I was 18 years old. After I brought [REDACTED]. I cut off
14 ties.

15 Q. And where did that conversation take place?

16 A. At Epstein's house.

17 Q. And what was it about?

18 A. I don't know. I don't remember.

19 We didn't end on bad terms. It was just after
20 I brought the last girl, I just never spoke to them
21 again.

22 MR. WILLITS: I don't have any other
23 questions.

24 MR. HOROWITZ: Neither does Bob.

25 CROSS EXAMINATION

1 it up.

2 MR. CRITTON: Can we mark it as the next
3 Exhibit?

4 MR. HOROWITZ: Let's show it to the camera.

5 MR. KUVIN: Do you want to mark it?

6 MR. WILLITS: Well, don't we have some sort of
7 a -- do we have a deal or not?

8 MR. CRITTON: Yeah. We're not -- the pictures
9 remain with the lawyers, you know, within the
10 confines of the files anyway. They're not going to
11 be filed.

12 MR. WILLITS: Okay. Sure. Mark it.

13 MR. KUVIN: This will be Plaintiff's 5. And,
14 Dick, give me one second to just show it to the
15 camera.

16 (Exhibit number 5 was marked for
17 identification purposes.)

18 MR. CRITTON: You know, it's probably not a
19 bad idea for the court reporter -- are you
20 attaching Exhibits to the depositions?

21 What you should do is probably put the
22 Exhibits in a separate envelope and put a sticker
23 on it as warning if it tells us the original,
24 whoever gets the original, they don't erroneously
25 file something.

1 BY MR. CRITTON:

2 Q. My name is Bob Critton. I represent
3 Mr. Epstein.

4 Is it okay if I call you [REDACTED]?

5 A. Yes.

6 Q. [REDACTED], you've been asked -- let's see. We
7 started today at 11:00. It's about quarter to 5:00 and
8 I think we took about 45 minutes to an hour for lunch
9 and we've had a couple other breaks. So I know you've
10 been here a long time, but you've also covered a lot of
11 territory that I need to kind of work my way back
12 through.

13 If I understand it from your testimony --
14 well, let me ask you this first: Mr. Kuvin, who spent
15 the better part of the day with you represents a person
16 named [REDACTED]. I think during one of his last few questions
17 he asked you whether you knew her. And I think your
18 response was you've never heard of her, correct?

19 A. That's correct.

20 Q. In the other approximately four hours' worth
21 of questioning, did he ever ask you one question about
22 [REDACTED]?

23 A. No.

24 Q. All right. With regard to Mr. Epstein, if I
25 understood your earlier testimony, is, you learned about

1 Mr. Epstein who was referred to as Jeff or Jeffrey from
 2 Jane Doe 101, correct?
 3 A. Yes.
 4 Q. All right. And that occurred at a bar called
 5 or a restaurant/bar called, [REDACTED], which is on the
 6 beach in [REDACTED], Florida?
 7 A. Yes.
 8 Q. And Jane Doe 101 basically said something to
 9 the effect, is, after you had a discussion with her and
 10 casual friend is, is, would you like to make a couple
 11 hundred bucks?
 12 A. Yes.
 13 Q. And when she -- and if I also understood your
 14 testimony, is, she basically said, depending on how
 15 you're dressed, you may earn a little bit more, a little
 16 less money; is that a fair statement?
 17 MR. HOROWITZ: Object to the form.
 18 MR. KUVIN: Join.
 19 MR. WILLITS: Object to the form.
 20 THE WITNESS: I'm sorry. Can you repeat the
 21 question?
 22 BY MR. CRITTON:
 23 Q. Sure. If I understood what Jane Doe 101 said
 24 to you, is, she said a number of thing, is, Jeff --
 25 Jeffrey lived in Palm Beach, had a big house, that you

1 MR. HOROWITZ: Form.
 2 MR. KUVIN: Join.
 3 THE WITNESS: Yes.
 4 BY MR. CRITTON:
 5 Q. Did Mr. Epstein at any time try to use any
 6 force or coercion or any type of physical force towards
 7 you?
 8 A. Never.
 9 Q. Did he ever threaten you in any way, either
 10 physically or verbally?
 11 A. No.
 12 Q. Did you find him to be, at least in your
 13 discussions with him, to be soft spoken; that is, he was
 14 nice to you?
 15 A. Yes.
 16 MR. KUVIN: Objection to form.
 17 BY MR. CRITTON:
 18 Q. Was he ever not nice to you or ever rude to
 19 you in any fashion?
 20 A. Never.
 21 MR. HOROWITZ: Form.
 22 MR. KUVIN: Join.
 23 BY MR. CRITTON:
 24 Q. Were you at any time --
 25 MR. WILLITS: Form.

1 would give him -- that you would be required to give him
 2 a massage, and that's pretty -- that's at least some of
 3 the information that she provided, correct?
 4 A. Yes.
 5 Q. Did she tell you what you should wear or
 6 suggest what you should wear in any way?
 7 A. No.
 8 Q. Did she at that time tell you that if you wear
 9 something or if you take something off, you might get
 10 paid a little bit more money?
 11 MR. HOROWITZ: Object to the form.
 12 MR. KUVIN: Join.
 13 THE WITNESS: No.
 14 BY MR. CRITTON:
 15 Q. And, so -- and that's pretty much what you
 16 knew about Mr. Epstein or Jeff until you got to the
 17 house?
 18 A. Yes.
 19 Q. And if I understood your testimony in response
 20 to questioning by Mr. Kuvin and Mr. Horowitz, is, you
 21 went upstairs, you gave the massage. He -- during the
 22 course of the massage he reached towards you, you said,
 23 in essence, stop, and that was the end of him in any way
 24 towards you or attempting to touch you; is that a
 25 correct statement?

1 BY MR. CRITTON:
 2 Q. -- concerned about your safety being in
 3 Mr. Epstein's home?
 4 A. That's absurd.
 5 Q. Okay. So the answer is no?
 6 A. No.
 7 Q. Were you -- did you at any time even
 8 contemplate yelling or screaming or crying for help at
 9 any time that you were around Mr. Epstein?
 10 A. No.
 11 Q. Were you ever with anyone in his home, at any
 12 time were you afraid or fearful or concerned at all
 13 about your safety?
 14 A. No.
 15 Q. After the one occasion that you were at
 16 Mr. Epstein's home and you gave him a massage, if I
 17 understood your testimony, you never gave him another
 18 massage?
 19 A. I never gave him another massage.
 20 Q. But, in fact, you did bring a number of girls,
 21 which I think you described to be approximately 12, 12
 22 different people, some people more than once, but 12
 23 different people that you can recall approximately?
 24 A. Yes.
 25 Q. And they were females?

1 A. Yes.
 2 Q. We know that. All right.
 3 A. That I know of, yes.
 4 Q. And of the females that you brought, if I
 5 understood your testimony, as to all of those girls you
 6 basically had or provided pretty much a standard talk or
 7 a standard -- you had kind of a standard explanation as
 8 to what would occur; is that a fair statement?
 9 A. That is a fair statement.
 10 Q. And if I also understood your testimony, is,
 11 after you brought one or two girls, that the word kind
 12 of got around in your circle of your friends and/or
 13 acquaintances and a lot of people wanted -- a number of
 14 other females wanted to come and to give Mr. Epstein
 15 massages at his home?
 16 MR. KUVIN: Form.
 17 THE WITNESS: Yes.
 18 BY MR. CRITTON:
 19 Q. And if I understood as well what you said, is,
 20 the little speech or the information that you provided
 21 the girls was, is that, there was a man in late forties,
 22 early fifties, you could make some money, you could give
 23 him a massage, you would go to his house, he's got a
 24 nice house in Palm Beach, he's a billionaire, he's nice,
 25 you don't have to be scared, you know, you don't have to

1 worry about anything when you're there?
 2 A. That's correct.
 3 Q. Did you tell them -- did you tell these girls
 4 that he would be respectful towards them?
 5 A. Yes.
 6 Q. Did you tell them that at no time would they
 7 ever experience any type of physical force or violence
 8 or any type of coercion?
 9 A. Yes.
 10 Q. And did you tell them that -- that you had
 11 never been afraid?
 12 A. Yes.
 13 Q. All right. And did some of the people who --
 14 well, let me ask it this way: Of those girls, did you
 15 tell all of them to tell Mr. Epstein that they were 18
 16 years old or older?
 17 A. I told all of them to lie about their age.
 18 Q. And you told them to lie about their age?
 19 A. That's correct.
 20 Q. And did any of them, that is, did any of the
 21 12 girls that you took, did any of them express any
 22 concern about lying about their age?
 23 A. No.
 24 Q. Did any of them express, that is, any of the
 25 12 girls that you took, did any of them ever express any

1 reservations about going; that is, did you have to try
 2 to cajole these people or encourage them to go or did
 3 all of the 12 basically once you told them what was
 4 going on and that they could make a couple hundred
 5 bucks, did all of them willingly go?
 6 A. Yes.
 7 Q. As to the girls that went, what I also
 8 understood your testimony, I think it was in response to
 9 Mr. Horowitz's questions, is that -- is, I think, as you
 10 said -- I think your testimony was, is, you told them,
 11 in essence, what Jane Doe 101 had told you; that is, if
 12 they go -- if they -- if they do a massage dressed,
 13 they'll make approximately X amount of dollars. If they
 14 leave just their bra on or if they take their skirt or
 15 their pants off or if they go topless, then they might
 16 make some additional money?
 17 MR. HOROWITZ: Form.
 18 MR. KUVIN: Join.
 19 THE WITNESS: Yes.
 20 BY MR. CRITTON:
 21 Q. And the girls that you talked to, that is, the
 22 12 approximately girls that you brought, did any of them
 23 ever express to you any reservations or any concern
 24 about -- after you told them that they might be asked to
 25 go topless or to take off their shirt or to do the

1 massage in their bra and a thong or maybe even with only
 2 partially clothed, did any of those girls after you told
 3 them that, express any reservation or concern?
 4 A. No.
 5 Q. Now, of the 12 girls that you took to
 6 Mr. Epstein's home in some fashion, did you transport
 7 them all or did some of them get there by themselves or
 8 pick you up and take you there?
 9 A. Sometimes I drove. Sometimes they drove.
 10 Q. And of the -- of the females that went to
 11 Mr. Epstein's home, the 12 -- and I'm talking about just
 12 their initial visits, and that would include Jane Doe 4,
 13 Jane Doe 7 and Jane Doe 3, all who are three Plaintiffs
 14 in three separate cases here, and -- did any of those
 15 girls, including those three, ever express when they
 16 came down from being upstairs with Mr. Epstein that they
 17 were scared or fearful of anything that had occurred at
 18 the house?
 19 MR. HOROWITZ: Form. Foundation.
 20 THE WITNESS: No.
 21 BY MR. CRITTON:
 22 Q. Did any of those girls during the time -- did
 23 any of those females during the time that they were
 24 upstairs at any time yell, scream or cry for help?
 25 A. No.

1 Q. Did anyone, other than the one person that you
 2 mentioned, [REDACTED], I think was her name --
 3 A. Uh-huh.
 4 Q. -- who was complaining about the amount of
 5 money or that she and Mr. Epstein had gotten into a
 6 dispute about the amount of money -- did any of them
 7 ever explain to you or tell you that they had had any
 8 problem with what occurred with Mr. Epstein upstairs?
 9 A. No.
 10 Q. Did any of them -- let me strike that.
 11 Let me focus on the one person who complained
 12 about the money, Ms. [REDACTED]. Did she ever -- other
 13 than saying she thought instead of getting 200 or
 14 whatever the number was she should have gotten 300, was
 15 that the extent of her complaint?
 16 A. Yes.
 17 Q. Did she ever complain or suggest to you that
 18 she had -- that there had been any type of verbal or
 19 physical abuse or any inappropriate conduct that had
 20 caused her any problem or that she complained about?
 21 A. No.
 22 Q. Did Ms. -- [REDACTED] go back again, to your
 23 knowledge?
 24 A. No. She wanted to, but I didn't feel
 25 comfortable bringing her back after the dispute, the

1 first dispute between them.
 2 Q. So [REDACTED], even though she had a dispute
 3 apparently with Mr. Epstein over money, she then came
 4 back to you and asked if she could go back again?
 5 A. She wanted to work for him again. And he
 6 pretty much made it clear that, you know, the whole
 7 argument was unnecessary and then I felt uncomfortable
 8 bringing her back, so I wouldn't bring her back. I told
 9 her no.
 10 Q. And, so, despite -- despite the financial
 11 dispute, did it appear there had been any other problem
 12 or any other issue or any other inappropriate actions by
 13 Mr. Epstein that would have suggested to you -- well,
 14 let me strike that.
 15 MR. HOROWITZ: Objection. Cumulative at this
 16 point, whatever your next question is.
 17 MR. CRITTON: I'll withdraw that question. I
 18 think I've finished with [REDACTED].
 19 BY MR. CRITTON:
 20 Q. Let me -- with the other 11 females, separate
 21 and apart from [REDACTED], did any of them ever complain to
 22 you at any time, whether it was the first or second
 23 visit or third, that they -- that anything that had
 24 occurred with Mr. Epstein was inappropriate or that --
 25 or that they complained about?

1 MR. HOROWITZ: Objection. Form. Cumulative.
 2 MR. KUVIN: Join.
 3 THE WITNESS: No.
 4 BY MR. CRITTON:
 5 Q. Did -- with the individuals that went back,
 6 did that include Jane Doe 7 and Jane Doe 4; that is,
 7 they went multiple times that you're aware of?
 8 A. Yes.
 9 Q. And did that include Jane Doe 3?
 10 A. I don't know.
 11 Q. You know for sure she went one time and you
 12 know she went another time when you and Jane Doe 3 took
 13 another [REDACTED]?
 14 A. Yes.
 15 Q. At the time that -- let me strike that.
 16 The [REDACTED] that was -- you and Jane Doe 3 took,
 17 did Jane Doe 3 ever express any concern to you or
 18 complaint that maybe it would be inappropriate to take
 19 [REDACTED] because something bad or inappropriate or humiliating
 20 or emotionally disturbing had occurred with her?
 21 A. No.
 22 MR. KUVIN: Objection to form.
 23 BY MR. CRITTON:
 24 Q. Did Jane Doe 3 ever tell you that as a result
 25 of the, at least one visit she had with Mr. Epstein,

1 that she suffered any type of emotional or mental
 2 trauma?
 3 A. No.
 4 MR. HOROWITZ: Form.
 5 BY MR. CRITTON:
 6 Q. Did she ever tell you, Jane Doe 3, at any time
 7 after she went to see Mr. Epstein and when she took [REDACTED]
 8 that she was concerned about [REDACTED] suffering some sort of
 9 emotional or mental anguish or trauma or psychological
 10 or psychiatric damage?
 11 A. No one ever complained of that.
 12 Q. Well, I want to stick just with Jane Doe 3.
 13 Did she ever complain about that?
 14 A. No.
 15 Q. Did Jane Doe 4 at any time after the first
 16 visit or the second or any other visits that you knew
 17 she had with Mr. Epstein, did she ever express to you
 18 that she was humiliated by the experience?
 19 MR. HOROWITZ: Cumulative.
 20 THE WITNESS: No.
 21 BY MR. CRITTON:
 22 Q. Did she, Jane Doe 4, ever tell that you she
 23 was embarrassed by having been with Mr. Epstein on the
 24 multiple occasions?
 25 MR. HOROWITZ: Form.

1 THE WITNESS: No.
 2 MR. CRITTON: Form. How can I correct it?
 3 MR. HOROWITZ: You can't. Cumulative. You
 4 have asked the same question six different ways and
 5 you already have the answer. And now you're using
 6 words. You're using synonyms.
 7 MR. CRITTON: I'm sorry I asked.
 8 MR. KUVIN: You asked.
 9 MR. HOROWITZ: Like a Thesaurus.
 10 How many different ways can you say anguish,
 11 trauma.
 12 BY MR. CRITTON:
 13 Q. [REDACTED], did Jane Doe 4 ever tell you she had
 14 sustained any type of emotional or psychological trauma?
 15 A. No.
 16 MR. HOROWITZ: Cumulative.
 17 THE WITNESS: It's Jane Doe 4 though. Sorry.
 18 BY MR. CRITTON:
 19 Q. [REDACTED].
 20 MR. KUVIN: Now he's going to reask all the
 21 questions.
 22 BY MR. CRITTON:
 23 Q. Did Jane Doe 3 or Jane Doe 4 --
 24 A. Yes.
 25 Q. -- ever tell you that they had lost income as

1 A. Yes.
 2 Q. Did she ever express to you as a result of
 3 having been with Mr. -- the time she spent with
 4 Mr. Epstein that she was required to see a psychologist
 5 or psychiatrist or any other health care professional?
 6 A. She did tell me something about that.
 7 Q. And when did she tell you that?
 8 A. When I moved back down here when her, [REDACTED]
 9 and I started hanging out.
 10 Q. And what did she tell you?
 11 A. Well, she didn't tell me directly. She told
 12 [REDACTED] that she had to go see a therapist, her and Jane
 13 Doe 7 had to see some therapist in [REDACTED] and they flew
 14 her out there and they had to fake cry and they had to
 15 pretend like they were damaged. They had to pretend
 16 that they were being molested. And Jane Doe 7 was
 17 laughing about it. This is according to what [REDACTED]
 18 told me.
 19 Q. Okay. Separate and apart from that incident,
 20 did Jane Doe 4 ever tell you that she had seen a
 21 psychiatrist or psychologist as a result of any contact
 22 that she had had with Jeffrey Epstein?
 23 A. No.
 24 Q. By the way, when Jane Doe 4 was dancing at
 25 [REDACTED] in [REDACTED], and you said that's a strip

1 a result of being -- of having gone to Mr. Epstein's
 2 home?
 3 A. No.
 4 Q. Did any of them, did either Jane Doe 3 or Jane
 5 Doe 4 ever tell you that their economic -- their ability
 6 to earn money in the future had in some way been
 7 impacted?
 8 A. No.
 9 Q. Did Jane Doe 3 ever tell you as a result of
 10 seeing Mr. Epstein that she was required to see a
 11 psychologist or psychologist?
 12 A. No.
 13 Q. Did Jane Doe 4 ever tell you -- and apparently
 14 you saw her for a number of years following the time
 15 that she -- she was at Mr. Epstein's home, correct? And
 16 you saw Jane Doe 4 even when she was at college or
 17 during the time she was at college at [REDACTED] University?
 18 A. Yes.
 19 Q. And if I understood your response to
 20 Mr. Horowitz's question, you even got to see her strip
 21 up at -- what was it?
 22 A. [REDACTED].
 23 Q. [REDACTED] --
 24 A. Yes.
 25 Q. -- up in [REDACTED] for three hours, right?

1 club?
 2 A. Yes.
 3 Q. And you said she tried out?
 4 A. Yes.
 5 Q. For, I assume, the manager?
 6 A. The whole club.
 7 Q. Oh. So Jane Doe 4, the [REDACTED] player from
 8 [REDACTED] University, was she in college at the time?
 9 A. Yes.
 10 Q. All right. And was she kind of a shy person?
 11 A. No.
 12 Q. And I think you also described -- described
 13 one of the instances why you don't respect her or don't
 14 think highly of her was, is that, you found her or
 15 your -- who you thought was your boyfriend having sex
 16 with Jane Doe 4?
 17 A. It was a guy that I was dating and she was
 18 having oral sex with him.
 19 Q. Okay.
 20 MR. HOROWITZ: Move to strike.
 21 BY MR. CRITTON:
 22 Q. Well, you saw it yourself?
 23 A. I walked in on them, yes.
 24 Q. All right. And she was giving him oral sex at
 25 the time?

1 A. That's correct.
 2 Q. And did you say anything?
 3 A. We almost got into a second fight.
 4 Q. And when she came up, so to speak, when she --
 5 you said something to her, did she stop what she was
 6 doing and then stand up?
 7 A. Well, she had been drinking and she kind of
 8 got up off the floor and she got in my face. We had a
 9 little bit of an altercation. And he pretty much got in
 10 between us and I walked away.
 11 MR. HOROWITZ: Move to strike.
 12 Non-responsive.
 13 BY MR. CRITTON:
 14 Q. And the male's name was?
 15 A. [REDACTED]
 16 Q. Was she, Jane Doe 4, dating anyone at the
 17 time, to your knowledge?
 18 A. I don't remember.
 19 Q. Approximately what time -- what time period
 20 are we dealing with?
 21 A. We were definitely in high school. I can't be
 22 accurate about the years.
 23 Q. Oh, okay. All right. Let me go back to [REDACTED]
 24 [REDACTED] --
 25 A. [REDACTED].

1 MR. KUVIN: Form.
 2 THE WITNESS: Yes.
 3 BY MR. CRITTON:
 4 Q. Did she tell you they asked her to stay or to
 5 come back?
 6 A. The manager came to me specifically and asked
 7 me if she wanted the job.
 8 Q. And of course she had to go back to college?
 9 A. Yes.
 10 Q. Let me be specific now with regard to Jane Doe
 11 7.
 12 Jane Doe 7. I think you testified you were
 13 aware that she went to Mr. Epstein's house on a number
 14 of occasions?
 15 A. Yes.
 16 Q. You took her once and you may have gone back
 17 one or more occasions with her?
 18 A. Possibly.
 19 Q. But you were aware from -- what? -- from
 20 speaking with her that she had gone back on multiple
 21 occasions?
 22 A. Yes.
 23 Q. And I think you told us earlier neither Jane
 24 Doe 4 nor Jane Doe 7 nor Jane Doe 3 described what
 25 actually occurred?

1 Q. [REDACTED]. When she -- you say she tried
 2 out for the whole club. What time of day was it that
 3 she was trying out?
 4 A. I can't be sure.
 5 Q. Evening?
 6 A. It was evening.
 7 Q. And were there patrons in the place?
 8 A. Yes.
 9 Q. And wear a costume?
 10 A. No.
 11 Q. What did she do? What did you see her do?
 12 A. Dance in her thong and pasties.
 13 Q. All right. Did she tell you afterwards she
 14 enjoyed it?
 15 A. Yeah. She said she made good money.
 16 Q. So that she tried out, she -- at a strip club,
 17 [REDACTED] in [REDACTED]. She danced for about three
 18 hours and made good money?
 19 A. Uh-huh.
 20 Q. Yes?
 21 A. Yes.
 22 Q. And could she have come back there to her work
 23 there if she didn't have to go back to school?
 24 A. Yes.
 25 Q. From at least what you observed?

1 A. That's correct.
 2 Q. And because you weren't upstairs, you don't
 3 know what occurred with them?
 4 A. That's correct.
 5 Q. And with regard to Jane Doe 7, did she ever
 6 tell you that Mr. -- well, let me strike that.
 7 Did she ever complain to you that Mr. Epstein
 8 had acted inappropriately with her at any time?
 9 A. No.
 10 Q. Did she, Jane Doe 7, ever complain that
 11 Mr. Epstein had used any type of physical or verbal
 12 force or violence directed to her?
 13 MR. HOROWITZ: Form. Cumulative.
 14 THE WITNESS: No.
 15 BY MR. CRITTON:
 16 Q. Did she, Jane Doe 7, ever tell you that she
 17 had suffered any type of emotional or mental trauma as a
 18 result of her involvement with Mr. Epstein?
 19 MR. HOROWITZ: Cumulative. Asked and
 20 answered.
 21 THE WITNESS: No.
 22 BY MR. EPSTEIN:
 23 Q. Did she ever tell you that she ever suffered a
 24 loss of income, either past income or the futurability
 25 to earn income as a result of her relationship with

1 Mr. Epstein?
 2 A. No.
 3 Q. Did she, Jane Doe 7, ever tell you that she
 4 was, as a result of her contact with Mr. Epstein, that
 5 she had been required to see a psychiatrist or a
 6 psychologist or some sort of mental health counselor?
 7 A. Not directly, no.
 8 Q. And the only thing you know is what you heard?
 9 A. Was told to me from [REDACTED].
 10 Q. All right. Did Jane Doe 7, Jane Doe 3. --
 11 well, let me strike that.
 12 Did Jane Doe 7 ever tell you that she was
 13 embarrassed or humiliated as a result of her actions
 14 with Mr. Epstein?
 15 MR. HOROWITZ: Form. Cumulative.
 16 THE WITNESS: No.
 17 BY MR. CRITTON:
 18 Q. You said at one time or on a number of
 19 occasions various individuals approached you so that
 20 they could go to Mr. Epstein's home?
 21 A. Uh-huh.
 22 Q. Is that correct?
 23 A. Yes.
 24 Q. Did that include Jane Doe 7 and Jane Doe 4?
 25 A. Yes.

1 Q. What was [REDACTED]'s -- let me strike that.
 2 Did you know anything about [REDACTED], other than
 3 that -- at the time that you spoke with her, other than
 4 she was dating [REDACTED] at the time?
 5 MR. KUVIN: Form.
 6 MR. HOROWITZ: Form.
 7 THE WITNESS: That she was dating [REDACTED]? No.
 8 I mean, that's all I knew.
 9 BY MR. CRITTON:
 10 Q. Well, did you know anything about her
 11 reputation around school?
 12 A. Yes.
 13 Q. What was her reputation?
 14 MR. KUVIN: Object to the form.
 15 THE WITNESS: She was promiscuous.
 16 BY MR. CRITTON:
 17 Q. And you had heard that from a number of
 18 people?
 19 MR. KUVIN: Object to the form.
 20 THE WITNESS: I heard that from two people.
 21 BY MR. CRITTON:
 22 Q. To your knowledge, was she sexually active?
 23 A. Yes.
 24 Q. Did she tell you that or did [REDACTED] tell you
 25 that? ...

1 Q. Did that include Jane Doe 3?
 2 A. I can't remember.
 3 Q. Now, Mr. Kuvin did ask a number of questions
 4 about [REDACTED].
 5 [REDACTED] is a person who you told -- you told to
 6 tell Epstein if asked that she was 18?
 7 A. Yes.
 8 Q. Did she have any problem with that?
 9 A. No.
 10 MR. HOROWITZ: Object to the form.
 11 MR. KUVIN: Join.
 12 BY MR. CRITTON:
 13 Q. What was [REDACTED]'s -- did you know who [REDACTED] was?
 14 A. Yeah.
 15 Q. I mean, you knew [REDACTED] from -- from high school?
 16 A. No.
 17 Q. You knew her through [REDACTED]?
 18 A. Yes.
 19 Q. All right. And when you told [REDACTED] about or told
 20 her about -- let me strike that.
 21 Did you tell me she had heard about it --
 22 heard about Epstein from someone else and she approached
 23 you or did you say you approached [REDACTED]?
 24 A. I had said something to her and she had asked
 25 me if I could take her.

1 A. Both.
 2 Q. And sexually active, both intercourse and oral
 3 sex?
 4 A. Yes.
 5 Q. And did [REDACTED] -- well, let me strike that.
 6 Do you know whether [REDACTED] also was a user of
 7 illegal drugs or non-prescription drugs?
 8 MR. KUVIN: Objection to form.
 9 THE WITNESS: Yes.
 10 BY MR. CRITTON:
 11 Q. And what kind of drugs were you aware that she
 12 used?
 13 A. Marijuana.
 14 MR. HOROWITZ: Form.
 15 BY MR. CRITTON:
 16 Q. Anything else?
 17 A. Not that I know of.
 18 Q. When [REDACTED] -- so you talked to [REDACTED] about
 19 Mr. Epstein. The matter dropped. And did she
 20 re-contact you, like, right away or within a few days?
 21 A. We had -- we had talked about it. I had said
 22 something to her. She had asked me if I could take her.
 23 And within a day or a couple days we had set it up.
 24 Q. But she approached you?
 25 A. Well, I had said something about it and then

1 she had asked me to take her.
 2 Q. But, again, she could have said, I'm not
 3 interested, don't --
 4 A. But she didn't.
 5 MR. KUVIN: Objection to form. Move to
 6 strike.
 7 BY MR. CRITTON:
 8 Q. Did she ever say, I'm not -- let me start
 9 again.
 10 You told her about it?
 11 A. Uh-huh, yes.
 12 Q. Did you then follow up with her on multiple
 13 additional conversations or was it [REDACTED] then who contacted
 14 you and said, I'd like to go?
 15 A. It was more we had talked about it, she
 16 contacted me or I contacted her and then we went. It
 17 wasn't like a phone tag game, no.
 18 Q. Did you have to push her in any way to go?
 19 A. No.
 20 Q. Did she -- was she encouraging you to take
 21 her?
 22 A. Yes.
 23 Q. And did you tell her the same thing that you
 24 had told the other girls, i.e., tell him -- lie about
 25 your age, the more you do, i.e., in terms of how you're

1 is, you never had -- you never spoke with Mr. Epstein by
 2 phone, never texted back and forth, nor never -- nor did
 3 you ever e-mail; is that correct?
 4 A. That's correct.
 5 Q. Did -- you knew Jane Doe 7 both before and
 6 after she had seen Mr. Epstein; is that correct?
 7 A. Yes.
 8 Q. And as of the last -- and did you see -- after
 9 Jane Doe 7 stopped going to Mr. Epstein's home, did you
 10 see her on -- well, I think you said you were roommates,
 11 if I understood correctly?
 12 A. That's true.
 13 Q. How long were you all roommates?
 14 A. Between -- about seven months.
 15 Q. Give me a time frame, if you could, [REDACTED]
 16 A. [REDACTED]
 17 [REDACTED]
 18 Q. And did you stay -- so at least you saw her
 19 pretty much everyday during that time period?
 20 A. That's true, yes.
 21 Q. So during the [REDACTED]
 22 [REDACTED], you saw Jane Doe 7 on
 23 almost a daily basis.
 24 On those -- during that daily basis, did she
 25 ever appear to be so depressed to you or depressed or

1 dressed or how you're undressed, you'll make more money?
 2 A. That's correct.
 3 Q. Did she express any concern or reticence about
 4 going?
 5 A. No.
 6 Q. All right. Did she express any -- instead of
 7 using reticence, probably not a great word -- did she
 8 express any hesitation or concern about going?
 9 A. No.
 10 MR. KUVIN: Objection. Cumulative.
 11 BY MR. CRITTON:
 12 Q. When she came -- well, let me strike that.
 13 When she came down after you went to Epstein's
 14 home, did she ever express any type of concern or
 15 complaints about anything that had occurred with
 16 Mr. Epstein?
 17 A. No.
 18 Q. Did she express to you at any time that there
 19 had been any inappropriate conduct --
 20 A. No.
 21 Q. -- or contact?
 22 A. No.
 23 MR. KUVIN: Objection to form.
 24 BY MR. CRITTON:
 25 Q. If I understood your -- your earlier testimony

1 upset to any degree that she did not appear to be
 2 carrying out her daily activities of living?
 3 MR. HOROWITZ: Form.
 4 THE WITNESS: No.
 5 BY MR. CRITTON:
 6 Q. Did you ever see Jane Doe 7 hesitate to go to
 7 a party or go to a bar? Well, let me strike that.
 8 Did you ever go with Jane Doe 7 to bars, to
 9 social gatherings, to parties during that time frame?
 10 A. Yes.
 11 Q. And did she ever appear to be emotionally
 12 disturbed or have any type of depression or concern that
 13 prevented her from attending parties, going out to bars,
 14 engaging in social activities, at least from what you
 15 observed?
 16 MR. HOROWITZ: Form.
 17 THE WITNESS: No.
 18 BY MR. CRITTON:
 19 Q. Did she ever express to you during that
 20 approximately six or seven months -- well, let me strike
 21 that.
 22 During that six or seven months, did she ever
 23 talk about Epstein?
 24 A. No, not that I can remember.
 25 Q. Did either one of you bring up Epstein?

1 A. It was a joke from time to time. I mean, we
 2 joked around about how nice it would be to find an
 3 Epstein that lived in [REDACTED]. We joked about it. But
 4 it wasn't anything derog -- well, I mean, you can
 5 consider that derogatory. But there was nothing about
 6 her psychiatric health or her ability to move on with
 7 life.
 8 Q. Okay. You say you joked about if you had an
 9 Epstein in [REDACTED], meaning what during that time frame?
 10 A. Meaning, it would just be nice if we had a guy
 11 for income, I guess.
 12 Q. And this time you were -- let's see, in [REDACTED]
 13 you were 20 years old?
 14 A. Uh-huh.
 15 Q. And -- or almost, you were just about 19,
 16 about to turn 20. Is Jane Doe 7 the same age as you or
 17 you're --
 18 A. Jane Doe 7 is a year younger.
 19 Q. So she would have been 18, closing in on
 20 19, --
 21 A. Yes.
 22 Q. -- depending on when her birthday was?
 23 So if I understand your testimony, the
 24 discussion that you and Jane Doe 7 had regarding
 25 Epstein, at least, in -- during that six or seven month

1 time period was, it would be nice to have an Epstein up
 2 there, as distinct from, I'd say, either one of you
 3 complaining or suggesting that you were depressed,
 4 humiliated, concerned or had any type of emotional
 5 problems?
 6 MR. HOROWITZ: Form. Compound.
 7 MR. KUVIN: Join.
 8 MR. CRITTON: Well, let me rephrase it.
 9 BY MR. CRITTON:
 10 Q. If I understood your testimony, is, you and
 11 Jane Doe 7 joked about, it would be nice to have an
 12 Epstein up there?
 13 MR. HOROWITZ: Asked and answered.
 14 MR. KUVIN: Join.
 15 THE WITNESS: Yes.
 16 BY MR. CRITTON:
 17 Q. And did you and Jane Doe 7 ever talk about or
 18 either one of you ever express any type of that either
 19 one of you had suffered any type of emotional injury or
 20 traumatic event as a result of your involvement with
 21 Mr. Epstein?
 22 MR. HOROWITZ: Cumulative. Asked and answered
 23 as to Jane Doe 7.
 24 MR. KUVIN: Join.
 25 THE WITNESS: No.

1 BY MR. CRITTON:
 2 Q. During the same -- after [REDACTED] -- and I
 3 understand that you returned because of [REDACTED]
 4 [REDACTED]?
 5 A. Yes.
 6 Q. And you returned back to the [REDACTED]
 7 area?
 8 A. Yes.
 9 Q. And you had little contact with Jane Doe 7
 10 after that point in time for some of the reasons you
 11 told us?
 12 A. That's correct.
 13 Q. And Jane Doe 4, up until the point that you
 14 returned to [REDACTED], did you stay in somewhat
 15 contact with her during the time period that you and
 16 Jane Doe 7 were roommates?
 17 A. I wouldn't say friends. When I lived with
 18 Jane Doe 7, like I said, I respected her as a roommate,
 19 so I treated Jane Doe 4 differently. But we weren't
 20 friends.
 21 Q. All right. All you know is -- but she did
 22 come out with you to go dancing with you at the [REDACTED]
 23 [REDACTED]?
 24 A. Yes.
 25 MR. CRITTON: I'm sorry. Dancing. Jane Doe 4

1 stripped.
 2 BY MR. CRITTON:
 3 Q. Anyhow, with regard to when Jane Doe 4 would
 4 come up to [REDACTED], did she come up on more than one
 5 occasion --
 6 A. I can't remember.
 7 Q. -- during the time you were roommates with
 8 Jane Doe 7?
 9 A. I can't remember.
 10 Q. You just remember the one time?
 11 A. That's correct.
 12 Q. And during the time that she came up there,
 13 did she seem to have any type of lingering depression or
 14 psychological condition, at least that she either
 15 expressed to you or that you observed?
 16 MR. HOROWITZ: Form. Foundation.
 17 THE WITNESS: No.
 18 BY MR. CRITTON:
 19 Q. Did you and Jane Doe 7 -- did you and Jane Doe
 20 4 ever e-mail back and forth, either on My Space or on a
 21 social networking thing?
 22 A. I believe My Space.
 23 Q. And did she ever express to you -- and let me
 24 strike that.
 25 In the times that she would communicate with

1 you on My Space, did she ever suggest that she was
 2 having any type of emotional problems?
 3 MR. HOROWITZ: Cumulative. Asked and
 4 answered.
 5 BY MR. CRITTON:
 6 Q. On the My Space?
 7 A. No.
 8 Q. Did she ever, in communicating, indicate that
 9 she was having pretty good life, that things seemed to
 10 be okay with her?
 11 A. Yes.
 12 Q. And did she -- "she," meaning, Jane Doe 4 --
 13 did she appear to be enjoying college and the college
 14 experience?
 15 A. Yes.
 16 MS. BLANTON: I need a quick restroom break,
 17 if you're at a decent stopping point.
 18 MR. CRITTON: I'm at a decent stopping point
 19 and I'll try to finish in about 10 or 15 minutes.
 20 VIDEOGRAPHER: Going off the record. The time
 21 is 5:18 p.m.
 22 (Brief recess.)
 23 VIDEOGRAPHER: We're back on the video record.
 24 The time is 5:22 p.m.
 25 BY MR. CRITTON:

1 she used?
 2 A. Cocaine.
 3 Q. To your knowledge, was Ms. Jane Doe 3 ever
 4 pregnant? Did she ever have an abortion?
 5 A. I have no idea.
 6 Q. To your knowledge, did Ms. Jane Doe 3 have any
 7 STDs?
 8 A. I have no idea.
 9 MR. HOROWITZ: Object to the form.
 10 BY MR. CRITTON:
 11 Q. To your knowledge, did Ms. Jane Doe 3 have any
 12 criminal history?
 13 A. I have no idea.
 14 Q. Did she ever express to you that she, Ms. Jane
 15 Doe 3, ever express to you that she had been molested by
 16 an individual?
 17 MR. HOROWITZ: Form.
 18 THE WITNESS: No.
 19 BY MR. CRITTON:
 20 Q. By a person named [REDACTED]?
 21 A. By who?
 22 Q. By a person named [REDACTED]?
 23 MR. HOROWITZ: Form.
 24 THE WITNESS: No.
 25 BY MR. CRITTON:

1 Q. I want to ask you some specific questions
 2 about a number of the girls. I want to start with Jane
 3 Doe 3 if I could.
 4 You described her earlier in response to
 5 either Mr. Kuvin or Mr. Horowitz's questions that her
 6 reputation was that she was promiscuous?
 7 MR. HOROWITZ: Object to the form.
 8 THE WITNESS: That's correct.
 9 BY MR. CRITTON:
 10 Q. And when you say promiscuous, what do you
 11 mean, [REDACTED]?
 12 A. Sleeping around. Having boys come over and
 13 stay the night with her.
 14 Q. And did you from time to time witness that?
 15 A. I was there one night -- twice actually, two
 16 different nights.
 17 Q. And did she -- and was this before she ever
 18 went over to Mr. Epstein's home?
 19 A. I believe so, yes.
 20 Q. And with regard to Jane Doe 3, separate and
 21 apart from being promiscuous, based upon what you heard
 22 and saw, did she -- were you aware whether she used
 23 illegal drugs?
 24 A. Yes, she did.
 25 Q. And what kind of drugs were you aware of that

1 Q. Did she ever indicate to you, again, that Jane
 2 Doe 3 -- let me strike that.
 3 Did you understand anything about her family
 4 life?
 5 A. I knew her sister.
 6 Q. And her sister, was she in your grade or --
 7 A. She went to school with my sister.
 8 Q. Did you know anything else about her, Jane Doe
 9 3?
 10 A. That's all I know.
 11 Q. The -- you were asked a question earlier about
 12 generically whether -- let me strike that.
 13 The girls that you asked to go or came to you
 14 to ask to go to Mr. Epstein's and, in fact, of the
 15 approximately 12 that went to Mr. Epstein, how would you
 16 have described them? Would you describe them, like,
 17 middle class? Upper class? Middle class? Lower middle
 18 class?
 19 MR. HOROWITZ: Foundation. Predicate.
 20 MR. KUVIN: Form.
 21 THE WITNESS: Same as me, middle class.
 22 BY MR. CRITTON:
 23 Q. And all of the girls that went, the females
 24 that went to Mr. Epstein's home, did you have -- that
 25 is, with almost all of them, did you have some idea or

1 did you know where they lived?
 2 A. Yes.
 3 Q. And, so, you were familiar with -- of the 12
 4 females that went to Mr. Epstein's home, you were
 5 familiar with where they lived, their neighborhood,
 6 their house, you know, what kind of car they either
 7 drove or were transported in?
 8 A. Yes.
 9 Q. And, so, when you say they were from the
 10 middle class, that was based upon your observations?
 11 A. Yes.
 12 Q. With regard to Jane Doe 4, you knew -- before
 13 she ever went to Mr. Epstein's home, were you familiar
 14 with any of her boyfriends?
 15 A. Uh-huh, yes.
 16 Q. And what was her main -- well, let me strike
 17 that.
 18 You also described Jane Doe 4 as being
 19 promiscuous?
 20 A. Yes.
 21 Q. And you knew that how?
 22 A. We were friends. She was dating [REDACTED]
 23 [REDACTED]. She was cheating on him every second that we
 24 were together. She had guys sneaking in and out of her
 25 window. Whenever her and [REDACTED] would break up she

1 or during the break up? You're kind of --
 2 BY MR. CRITTON:
 3 Q. During the entire time she dated him,
 4 including break ups, did you see her having or engaging
 5 in some type of sexual activity?
 6 A. At least two.
 7 Q. And as to Jane Doe 4, were you aware of
 8 whether or not she used illegal drugs?
 9 A. Yes.
 10 Q. And what illegal drugs were you aware that she
 11 took?
 12 MR. HOROWITZ: Form. Foundation.
 13 THE WITNESS: Xanax, marijuana and cocaine.
 14 BY MR. CRITTON:
 15 Q. And did you actually see her take those?
 16 A. Yes.
 17 Q. Now, [REDACTED] [REDACTED], were you -- did -- were
 18 you ever -- well, let me strike that.
 19 I assume you knew him?
 20 A. Yes.
 21 Q. Were you ever present when Mr. [REDACTED] struck,
 22 hit or physically abused Ms. Jane Doe 4?
 23 A. Yes.
 24 Q. On more than one occasion did you see him --
 25 A. Yes.

1 would date another guy for maybe three days and then get
 2 back with [REDACTED].
 3 Q. And was she hooking up with these guys? Did
 4 she tell you that?
 5 MR. HOROWITZ: Objection. Foundation.
 6 THE WITNESS: I saw it a few times.
 7 BY MR. CRITTON:
 8 Q. And you say you saw it on a few occasions?
 9 THE WITNESS: Yes.
 10 BY MR. CRITTON:
 11 Q. So you -- you physically -- you have personal
 12 knowledge during the time that she was dating [REDACTED]
 13 during the times they were broken up, on more than one
 14 occasion you would see her having or engaging in sexual
 15 activity with others, other males?
 16 A. Not necessarily having sex. Engaging, yes.
 17 Q. Well, in addition -- let's see. One of the
 18 individuals was a guy that you were dating, correct?
 19 A. Yes.
 20 Q. And did you see her with others as well?
 21 A. Yes.
 22 Q. Approximately how many other individuals,
 23 separate and apart from [REDACTED], during the time she was
 24 dating [REDACTED]?
 25 MR. HOROWITZ: During the time she was dating

1 Q. -- physically abuse her?
 2 A. (Nods head.)
 3 Q. What was her reaction to the physical abuse
 4 that her boyfriend was doing to her?
 5 A. Sometimes she would hit back. She would fight
 6 back. Other times she would spit on him. Sometimes she
 7 would run from him.
 8 Q. You'd see her actually hit and spit -- hit him
 9 back and spit on him?
 10 A. That's correct.
 11 Q. Did you ever see him spit on her?
 12 A. Yes.
 13 Q. Did she ever -- did you ever discuss with her,
 14 that is, with Jane Doe 4, that maybe this wasn't a
 15 healthy relationship?
 16 A. Several times.
 17 Q. What was her response? Was this prior to her
 18 seeing Mr. Epstein or ever meeting Mr. Epstein?
 19 A. That's correct.
 20 Q. And what was her response to your
 21 conversations with her about the physical and verbal
 22 abuse that [REDACTED] -- I'm sorry -- that [REDACTED] [REDACTED]
 23 was causing her?
 24 A. We staged an intervention once with her family
 25 and they called the police. And she told the police

1 officer she didn't want to have a restraining order or
2 to press charges against him after she got beat by him.
3 We had several conversations about her being
4 in an unhealthy relationship and maybe going to a clinic
5 where abused women or women with relationship issues
6 should go to maybe get therapy as couples or to leave
7 him.

8 And she looked at me like I was nuts. I'm in
9 love with him. I don't want to leave him. He loves me.
10 Crazy talk.

11 Q. So despite your involvement in speaking with
12 her and her family and intervention with her, nobody
13 could talk her out of staying in her abusive
14 relationship?

15 MR. HOROWITZ: Form.

16 THE WITNESS: No.

17 BY MR. CRITTON:

18 Q. In terms of Ms. Jane Doe 4, were you ever
19 aware whether she was pregnant?

20 A. Yes.

21 Q. On how many occasions were you aware that she
22 was pregnant?

23 A. Two or three.

24 Q. And did she ever have a child?

25 A. No.

1 BY MR. CRITTON:

2 Q. And what did the video depict?

3 A. I never saw it myself, but there were pictures
4 of her on the Internet going around with [REDACTED], lesbian
5 pictures in their underwear, their thong, posing on top
6 of each other, making out.

7 Q. Did you ever see any of those pictures or
8 that's just what you were told?

9 A. That's what I was told.

10 Q. And who told you that?

11 A. My boyfriend at the time.

12 Q. Who was?

13 A. [REDACTED].

14 Q. And in terms of Jane Doe 4, did you ever talk
15 to her about it, say, hey, I heard you did a video with
16 -- what was her name? -- [REDACTED]?

17 A. Yes.

18 Q. Did you ever ask her about it?

19 A. My boyfriend did while I was present and she
20 said that she didn't care, it didn't bother her, and
21 that if somebody had a problem with it, they could F
22 off. That was pretty much her attitude.

23 Q. And you heard her say that?

24 A. Yes.

25 Q. And did she ever indicate that the pictures

1 Q. Did she have abortions?

2 A. Yes.

3 MR. HOROWITZ: Form.

4 BY MR. CRITTON:

5 Q. And did she tell you that?

6 A. Yes.

7 Q. And did she tell other people, as far as you
8 know?

9 A. Yes.

10 Q. Who else did she tell?

11 A. Jane Doe 7. She told [REDACTED]
12 [REDACTED], obviously. And that's all I know. [REDACTED] as
13 well.

14 Q. So at least among that group it was pretty
15 common knowledge that she had had three abortions?

16 MR. HOROWITZ: Form.

17 THE WITNESS: Two or three.

18 BY MR. CRITTON:

19 Q. Two or three abortions. Do you know if she
20 ever told her family?

21 A. No, I do not.

22 Q. Were you ever aware of a video that she made
23 with another female?

24 MR. HOROWITZ: Form.

25 THE WITNESS: Yes, in high school.

1 that were displayed of her having -- in her thong, in
2 some sort of, at least what was perceived to be a
3 lesbian relationship with [REDACTED], that that caused her
4 any embarrassment or humiliation?

5 MR. HOROWITZ: Form.

6 THE WITNESS: No.

7 BY MR. CRITTON:

8 Q. Well, did you hear -- so I'm clear, is, I
9 thought -- thought you said that [REDACTED] asked her about
10 the pictures?

11 A. Yes, he did.

12 Q. And did he describe the pictures as to what,
13 say, hey, I hear -- did he say something like, hey, I
14 hear you and [REDACTED] are on the Internet and shows
15 pictures of you guys on top of each other?

16 A. No. He had just briefly mentioned that there
17 were pictures on the Internet floating around and he
18 caught one of them.

19 Q. And that's when she said, if you have a
20 problem with it, F off?

21 A. Pretty much was her attitude.

22 Q. All right. Were you ever aware that she did
23 her own photography, made a video of she and [REDACTED]
24 [REDACTED] engaging in various sexual acts?

25 MR. HOROWITZ: Form.

1 THE WITNESS: I can't disclose that
 2 information.
 3 BY MR. CRITTON:
 4 Q. Let me ask it this way: Did she ever tell
 5 you?
 6 A. She never told me.
 7 Q. Did she or [REDACTED] ever show you a
 8 video of the two of them having sex?
 9 A. No.
 10 Q. Did [REDACTED], from your observations -- let me
 11 strike that.
 12 When you were present, did you ever observe
 13 [REDACTED] using illegal drugs?
 14 A. Yes.
 15 Q. Was he -- did you ever view him or observe him
 16 taking or drinking excessively?
 17 A. Yes.
 18 Q. Did -- was [REDACTED], from at least your
 19 perception, a drug addict?
 20 MR. HOROWITZ: Form.
 21 THE WITNESS: Yes.
 22 BY MR. CRITTON:
 23 Q. Well, let me ask you this: How would you
 24 describe [REDACTED] and his use of illegal drugs?
 25 A. He had an addiction.

1 Q. And at the times -- on some of the occasions
 2 that you saw [REDACTED] present and taking illegal
 3 drugs, was Jane Doe 4 partaking in the same illegal
 4 drugs?
 5 MR. HOROWITZ: Form.
 6 THE WITNESS: Yes.
 7 BY MR. CRITTON:
 8 Q. Was [REDACTED] known for being a seller
 9 of drugs?
 10 MR. HOROWITZ: Form.
 11 THE WITNESS: I don't know.
 12 BY MR. CRITTON:
 13 Q. All you know, he was a user?
 14 A. Yes.
 15 Q. Was Jane Doe 4 dating [REDACTED] during the time
 16 she was seeing Jeffrey Epstein?
 17 A. Yes.
 18 Q. Did she ever tell [REDACTED]?
 19 A. She wouldn't.
 20 MR. HOROWITZ: Form.
 21 BY MR. CRITTON:
 22 Q. To your knowledge?
 23 A. No.
 24 Q. Did you ever see [REDACTED] threaten to
 25 kill or to injure Jane Doe 4?

1 Q. And what kind of drugs, illegal drugs did he
 2 take?
 3 A. Cocaine, pills, alcohol.
 4 Q. Did you ever see him using those, that is,
 5 cocaine, pills -- cocaine and pills in the presence of
 6 he and Jane Doe 4?
 7 A. Yes.
 8 Q. So if I had to ask you to assume that Jane Doe
 9 4 has testified in this case that she was unaware that
 10 [REDACTED] abused illegal drugs, would you be surprised to
 11 hear that testimony?
 12 MR. HOROWITZ: Form.
 13 THE WITNESS: Not really.
 14 BY MR. CRITTON:
 15 Q. Because you think she doesn't tell the truth?
 16 MR. HOROWITZ: Form.
 17 THE WITNESS: She doesn't tell the truth.
 18 BY MR. CRITTON:
 19 Q. And, so, let me just ask it this way: Were
 20 you physically present when -- when you saw [REDACTED]
 21 [REDACTED] taking illegal drugs and Jane Doe 4 was there
 22 and saw it as well?
 23 A. Yes.
 24 MR. HOROWITZ: Form.
 25 BY MR. CRITTON:

1 A. On a regular basis.
 2 Q. Literally?
 3 A. Literally.
 4 Q. What was her response to that?
 5 A. She -- upset, start a physical fight.
 6 Q. At what point were you aware when she stopped
 7 dating [REDACTED]?
 8 A. I wasn't aware that they had stopped dating
 9 until I moved back home and she was with another guy.
 10 Q. Who was the guy that she was with?
 11 A. [REDACTED].
 12 Q. And who is [REDACTED]?
 13 A. Her boyfriend.
 14 Q. Is that -- when is the last time you saw Jane
 15 Doe 4?
 16 A. I don't remember. I want to say, [REDACTED].
 17 Q. Was that -- was -- and who was she there with
 18 at the time?
 19 A. It was her and two girls.
 20 Q. And did you talk about Epstein at all on that
 21 occasion?
 22 A. No.
 23 Q. Did she try to bring it up with you?
 24 A. No.
 25 Q. Did you speak to her?

1 A. No.
 2 Q. You saw her, but neither one of you spoke?
 3 A. Yes.
 4 Q. With regard to [REDACTED], her boyfriend, do you
 5 know what his last name is?
 6 A. No, I do not.
 7 Q. Did you ever know a boy that she dated named
 8 [REDACTED]?
 9 A. Yes.
 10 Q. And how did you know [REDACTED]?
 11 A. I didn't know him personally. She talks about
 12 him. They had dated for a short period of time. I'm
 13 guessing this is either in between [REDACTED]. I can't be
 14 sure. His name came up a lot, but that's it.
 15 Q. Did she ever indicate to you whether while she
 16 was dating [REDACTED] she was cheating on him?
 17 A. No, she never indicated that.
 18 Q. With regard to [REDACTED], do you know anything
 19 about him?
 20 A. He's a drug dealer.
 21 Q. And how do you know [REDACTED] is a drug dealer?
 22 A. I was around them both.
 23 Q. Were you around [REDACTED] when he was using
 24 illegal drugs?
 25 A. Yes.

1 Q. And what kind of illegal drugs was he using?
 2 A. Cocaine.
 3 Q. And at the time -- and this was well after
 4 Epstein; that is, you had -- either one of you had seen
 5 Mr. Epstein?
 6 A. I'm sorry?
 7 Q. Was the time that she -- when she -- "she,"
 8 meaning, Jane Doe 4 -- started dating [REDACTED], was that
 9 after the time that she had seen Mr. Epstein?
 10 A. Yes.
 11 Q. And when she started dating [REDACTED], were you
 12 ever present when you saw her taking illegal drugs with
 13 [REDACTED]?
 14 MR. HOROWITZ: Form.
 15 THE WITNESS: No.
 16 BY MR. CRITTON:
 17 Q. You just saw [REDACTED] using cocaine?
 18 A. Yes.
 19 Q. And in terms of [REDACTED] being a drug dealer, is
 20 that -- did Jane Doe 4 -- did you ever ask Jane Doe 4
 21 one way about it?
 22 A. Me and her had a conversation, me coming from
 23 similar situation, I tried to give her advice. And she
 24 didn't want to listen.
 25 Q. Was she aware that [REDACTED] was a drug dealer?

1 A. Yes.
 2 Q. Did she tell you that?
 3 A. Yes.
 4 Q. What was her -- was she concerned about that?
 5 A. She said he was going to eventually stop.
 6 MR. KUVIN: I'm sorry. Is [REDACTED] a Plaintiff
 7 in one of these cases?
 8 I was just curious.
 9 BY MR. CRITTON:
 10 Q. When is the last -- when is the last time you
 11 had any conversation with Jane Doe 4?
 12 A. When I sent her a text message -- text message
 13 letting her know that I knew what was going on about the
 14 whole lawsuit.
 15 Q. Do you know anything about Jane Doe 4's home
 16 life?
 17 A. Yes.
 18 MR. HOROWITZ: Form. Vague.
 19 MR. CRITTON: I'm sorry?
 20 MR. HOROWITZ: Vague. Her home life. What
 21 does that mean?
 22 BY MR. CRITTON:
 23 Q. You know where she lived?
 24 A. Yes.
 25 Q. Okay. Do you know anything about her parents?

1 A. Yes.
 2 Q. What do you know about her father?
 3 MR. HOROWITZ: Vague.
 4 THE WITNESS: Crazy.
 5 BY MR. CRITTON:
 6 Q. And what do you mean, "crazy?"
 7 A. He -- when he talks, he always sniffed. And
 8 it used to be a joke with me and Jane Doe 4's friends
 9 until we understood that he was a drug user when he was
 10 younger.
 11 Q. Do you know anything about -- as far as you
 12 know though, during the time that you knew him, was he a
 13 drug user?
 14 A. I have no idea.
 15 MR. HOROWITZ: Form.
 16 BY MR. CRITTON:
 17 Q. How about her mother?
 18 A. Nice lady.
 19 Q. Jane Doe 4's. What do you know about her?
 20 A. Nice lady.
 21 Q. They live in a nice home?
 22 A. [REDACTED].
 23 Q. I'm sorry?
 24 A. [REDACTED].
 25 Q. They live in a nice home?

1 A. Yes.
 2 Q. Did Jane Doe 4 have access to nice clothes and
 3 to, you know, living in a -- being able to drive around
 4 in a vehicle?
 5 A. Yes.
 6 Q. At least have access to a vehicle?
 7 A. Yes.
 8 Q. Would you have considered either Jane Doe 3,
 9 Jane Doe 7, or Jane Doe 4 to be underprivileged or dirt
 10 poor in any way?
 11 MR. HOROWITZ: Form.
 12 THE WITNESS: No, not at all.
 13 BY MR. CRITTON:
 14 Q. Did Jane Doe 4 ever tell you how many times
 15 she had been to Mr. Epstein's home?
 16 A. No.
 17 Q. Let me turn to Jane Doe 7.
 18 You knew Jane Doe 7 from high school?
 19 A. Yes.
 20 Q. And you met her through whom? That is, did
 21 you know Jane Doe 4 first or Jane Doe 7?
 22 A. I knew -- I knew Jane Doe 7 first, but me and
 23 Jane Doe 4 shared a class together.
 24 Q. Jane Doe 7. Had you ever been to her home?
 25 A. Yes.

1 A. Both.
 2 Q. And in terms of Jane Doe 7 having a lot of
 3 boyfriends, did she have anybody that was steady or did
 4 she go with a lot of men?
 5 A. She went with a lot of men.
 6 Q. From your observations and at least watching
 7 her -- well, let me strike that.
 8 Prior to -- well, let me strike that.
 9 At any time did you ever see Jane Doe 7 using
 10 any type of illegal drugs?
 11 MR. HOROWITZ: Form.
 12 THE WITNESS: Yes.
 13 BY MR. CRITTON:
 14 Q. What type of drugs did you see her use?
 15 A. Marijuana and Xanax.
 16 Q. And did you see her use those before -- let me
 17 strike that.
 18 When you all were in high school together, did
 19 you see her using marijuana and Xanax?
 20 A. Yes.
 21 Q. And post-high school and when you were living
 22 up north -- not north -- living up in [REDACTED], did she
 23 continue to use these illegal drugs, at least from what
 24 you observed?
 25 A. What I observed? No.

1 Q. Nice home?
 2 A. Yes.
 3 Q. Her mother and father, what did you know about
 4 her home life, in terms of her parents, from what you
 5 observed?
 6 A. They spoiled her.
 7 Q. In what way?
 8 A. Paid for everything. She never had to work a
 9 day in her life. They bought her cars all the time.
 10 Paid her phone bill. Let her pretty much do anything
 11 she wanted.
 12 Q. From your observations, at least with Jane Doe
 13 7, did she seem to be spoiled?
 14 A. Yes.
 15 Q. And what was Jane Doe 7 -- from your
 16 observations, did Jane Doe 7 have a lot of boyfriends --
 17 A. Yes.
 18 Q. -- when you knew her, again, before
 19 Mr. Epstein?
 20 A. Yes.
 21 Q. And, again, I think you described her as being
 22 as well promiscuous?
 23 A. Yes.
 24 Q. And is that something you observed or was that
 25 her reputation at school?

1 Q. Did she continue -- let me strike that.
 2 After you were her roommate, did she continue
 3 to be sexually active?
 4 A. I don't know.
 5 Q. Did she continue to date on a regular basis?
 6 A. I don't know.
 7 Q. Did she go out -- did she go out often?
 8 A. I don't know.
 9 Q. Not right now. When you were roommates?
 10 A. When we were roommates, yes.
 11 Q. And did you ever observe -- did you ever go
 12 out with her or out with a group of friends --
 13 A. Yes.
 14 Q. -- to bars? Did she appear to be, at least
 15 during the time that you were living in [REDACTED], she
 16 appeared to date on a regular basis?
 17 A. Yes.
 18 Q. Do you know whether Jane Doe 7 -- and I don't
 19 think I asked you about Jane Doe 4. Do you know whether
 20 she ever had any type of sexually transmitted disease?
 21 MR. HOROWITZ: Form. Come on, Bob. That's
 22 just not right.
 23 THE WITNESS: Jane Doe 7. I heard, but I don't
 24 know.
 25 BY MR. CRITTON:

1 Q. Did she ever discuss it with you?
 2 A. No.
 3 MR. HOROWITZ: Bob.
 4 BY MR. CRITTON:
 5 Q. How about Jane Doe 7, do you know whether she
 6 ever had any type of --
 7 A. We just talked about Jane Doe 7.
 8 MR. HOROWITZ: Form.
 9 BY MR. CRITTON:
 10 Q. I'm sorry. I meant Jane Doe 4.
 11 A. Yes.
 12 MR. HOROWITZ: Form.
 13 BY MR. CRITTON:
 14 Q. Let me go back to Jane Doe 4.
 15 Did Jane Doe 4 ever tell you that she had any
 16 type of STD?
 17 A. Yes.
 18 Q. What did she tell you?
 19 MR. HOROWITZ: Form.
 20 THE WITNESS: She told me that [REDACTED] gave
 21 her HPV, which led to warts.
 22 BY MR. CRITTON:
 23 Q. And did she tell you that she was embarrassed
 24 or humiliated about that?
 25 MR. HOROWITZ: Form.

1 MR. HOROWITZ: Form. Cumulative.
 2 BY MR. CRITTON:
 3 Q. Is [REDACTED] the only person you're aware of that
 4 Jane Doe 7 brought to Mr. Epstein's, that is, by name?
 5 A. By name, yes.
 6 Q. Did she indicate to you that she had taken
 7 other people there?
 8 A. She didn't and I don't want to speculate.
 9 Q. And I think you said that Jane Doe 4 said that
 10 she had brought at least one person there, correct?
 11 A. Yes.
 12 Q. Did either Jane Doe 7 or Jane Doe 4 tell you
 13 what they had -- well, let me strike that.
 14 Did Jane Doe 7 ever tell you what she had told
 15 [REDACTED] before taking her to Mr. Epstein's?
 16 A. No.
 17 Q. Did Jane Doe 4 ever tell you what she had told
 18 [REDACTED] before she took her to Epstein's?
 19 MS. BLANTON: You okay? You need a break?
 20 THE WITNESS: No. I'm good.
 21 MS. BLANTON: We're getting long.
 22 THE WITNESS: It's okay.
 23 MS. BLANTON: Tell me.
 24 THE WITNESS: My butt is numb.
 25 MS. BLANTON: You want to stand up, walk

1 THE WITNESS: She told me -- well, she asked
 2 me politely not to mention anything, and that she
 3 had gone to the gyno and had it taken care of. But
 4 she didn't realize that [REDACTED] had given it to
 5 her.
 6 BY MR. CRITTON:
 7 Q. And I think you said -- I asked you about Jane
 8 Doe 7.
 9 To your knowledge, did Jane Doe 7 ever discuss
 10 with you whether she had an STD?
 11 MR. HOROWITZ: Form. Asked and answered.
 12 THE WITNESS: Jane Doe 7 never discussed that
 13 with me.
 14 BY MR. CRITTON:
 15 Q. I think you said Jane Doe 7 brought someone
 16 named [REDACTED] to Mr. Epstein's home?
 17 A. Yes.
 18 Q. Did -- and how did you know that? Did Jane
 19 Doe 7 tell you?
 20 A. Uh-huh, yes.
 21 Q. Yes? Did Jane Doe 7 ever say, you know, my
 22 experience was so -- with Mr. Epstein was so
 23 inappropriate, I don't want -- I shouldn't expose any
 24 other person to Mr. Epstein?
 25 A. No.

1 around? You okay?
 2 THE WITNESS: I'm good.
 3 BY MR. CRITTON:
 4 Q. Did you ever discuss Mr. Epstein with Jane Doe
 5 7 at [REDACTED] ?
 6 A. Yes.
 7 Q. And did she approach you?
 8 A. Yes.
 9 Q. Or did you approach her?
 10 A. She approached me and the group I was standing
 11 with.
 12 Q. And who was she with?
 13 A. A random guy.
 14 Q. And --
 15 MR. CRITTON: I'm sorry?
 16 MR. HOROWITZ: Go ahead.
 17 BY MR. CRITTON:
 18 Q. And when she approached you with this random
 19 person, were you aware that she was a Plaintiff in these
 20 lawsuits?
 21 A. Yes.
 22 Q. And did she say anything to you about the
 23 lawsuit or her being a Plaintiff and suing Mr. Epstein?
 24 MR. HOROWITZ: Asked and answered.
 25 THE WITNESS: We had discussed it, yes.

1 BY MR. CRITTON:
 2 Q. And did she ever tell you why she was bringing
 3 a lawsuit against Mr. Epstein?
 4 A. She told me her parents were pushing her to.
 5 Q. Did she indicate that she really didn't want
 6 to bring the lawsuit, but that her parents were pushing
 7 her?
 8 MR. HOROWITZ: Form.
 9 THE WITNESS: She said it wasn't her fault and
 10 that her parents had really been pushing the issue.
 11 BY MR. CRITTON:
 12 Q. Did you ever know a person named [REDACTED]?
 13 A. Yes.
 14 Q. Do you know whether she went to Epstein's?
 15 A. She did.
 16 Q. And do you know who took her?
 17 A. I can't be quite sure. I don't remember.
 18 MR. CRITTON: I think I'm almost done. Give
 19 me about one minute. Just look at my notes.
 20 BY MR. CRITTON:
 21 Q. [REDACTED], with regard to -- I'm going to ask the
 22 same question with each of the three -- but with regard
 23 to Jane Doe 3 -- Jane Doe 3, did she ever tell you that
 24 she was sexually assaulted or battered; that is,
 25 physically touched by Mr. Epstein?

1 VIDEOGRAPHER: We're back on the video record.
 2 The time is approximately 5:58 p.m. This is the
 3 beginning of tape number five.
 4 REDIRECT EXAMINATION
 5 BY MR. KUVIN:
 6 Q. Are you aware that Jeffrey entered into a
 7 non-prosecution agreement with the Federal Government
 8 with respect to the claims of all the girls that came to
 9 his house? Did anyone ever talk to you about that,
 10 other than your lawyers?
 11 MS. BLANTON: Other than your lawyers.
 12 THE WITNESS: No.
 13 BY MR. KUVIN:
 14 Q. Are you aware as a part of that agreement, he
 15 essentially hung you out to dry, didn't put you in the
 16 agreement?
 17 MS. BLANTON: Anything you know about that
 18 agreement that you did not learn from your
 19 attorneys, you can discuss; otherwise, you are not
 20 to discuss it.
 21 MR. CRITTON: Form.
 22 THE WITNESS: Can you repeat the question?
 23 BY MR. KUVIN:
 24 Q. Yeah. Are you aware, other than conversations
 25 with your attorneys, that Jeffrey Epstein did not get

1 A. No.
 2 Q. Did she ever tell you that she had suffered
 3 some sort of intentional infliction of some huge or
 4 severe emotional distress?
 5 A. No.
 6 Q. Did Jane Doe 4 ever tell you that she had been
 7 sexually assaulted or physically battered by
 8 Mr. Epstein?
 9 MR. HOROWITZ: Cumulative.
 10 THE WITNESS: No.
 11 BY MR. CRITTON:
 12 Q. Did Jane Doe 7 ever tell that you that they
 13 had been -- that she had been sexually assaulted or
 14 battered or physically --
 15 MR. HOROWITZ: Cumulative.
 16 BY MR. CRITTON:
 17 Q. -- touched by Mr. Epstein?
 18 A. No. That's ridiculous.
 19 MR. CRITTON: That's all I have. Thank you,
 20 ma'am.
 21 THE WITNESS: Can I just get a two-minute
 22 break?
 23 VIDEOGRAPHER: Going off the record. This is
 24 the end of tape number four. The time is 5:52.
 25 (Brief recess.)

1 immunity for you with the Federal Government when he was
 2 negotiating on behalf of [REDACTED],
 3 Lesley Graaf (phonetics), [REDACTED] (phonetics)?
 4 MR. CRITTON: Form.
 5 THE WITNESS: No.
 6 BY MR. KUVIN:
 7 Q. Obviously when you were going to Jeffrey's
 8 house and bringing girls to him it was before December 7
 9 of 2000 -- I'm sorry -- before October 29 of 2007,
 10 wasn't it?
 11 A. I don't remember.
 12 Q. It was before 2007, wasn't it?
 13 A. Oh, before 2007, yes.
 14 Q. Okay. Other than what your attorneys may have
 15 told you, are you aware that he negotiated for immunity
 16 for [REDACTED], [REDACTED], Lesley Graaf and [REDACTED]
 17 [REDACTED]?
 18 MR. CRITTON: Form.
 19 THE WITNESS: No.
 20 BY MR. KUVIN:
 21 Q. Other than your attorneys, did anyone discuss
 22 whether or not he should negotiate for immunity for you?
 23 A. No.
 24 Q. You seem to have no problems talking about
 25 other girls being promiscuous, boys being promiscuous,

1 blow jobs, sex, abortions, illegal drug use, Xanax,
 2 marijuana, alcohol, vaginal warts, people who are
 3 spoiled, drug dealers, sex videos and lesbianism of
 4 people that may be Plaintiffs in other lawsuits, as well
 5 as you seem to have no problem talking about people that
 6 may not be Plaintiffs in civil lawsuits.
 7 As you sit here today, when did you first
 8 start having sex?
 9 MR. CRITTON: Form.
 10 MS. BLANTON: Objection. This was asked
 11 previously. The objection is the same and her
 12 instructions not to answer that question are the
 13 same.
 14 BY MR. KUVIN:
 15 Q. So you had no problem talking about other
 16 people's promiscuity, drug use, vaginal warts and other
 17 sexual conduct, but you're not going to sit here and
 18 tell us anything about your sexual activity; is that
 19 true?
 20 MS. BLANTON: You do not need to answer that.
 21 You do not need to answer that.
 22 THE WITNESS: Nope.
 23 MS. BLANTON: I'm instructing you not to
 24 answer that very argumentative question, if there
 25 is even is question in it.

1 A. No.
 2 MR. CRITTON: Form.
 3 BY MR. KUVIN:
 4 Q. When did you stop?
 5 MS. BLANTON: Objection.
 6 THE WITNESS: I'm asserting my Fifth Amendment
 7 Right.
 8 BY MR. KUVIN:
 9 Q. Okay. So you're not using them today?
 10 A. Asserting my Fifth Amendment Right.
 11 MS. BLANTON: Objection. I'm instructing her
 12 not to respond to any more of your questions.
 13 MR. KUVIN: Oh, we're done?
 14 MS. BLANTON: No. With what you are doing
 15 right now we are done.
 16 MR. KUVIN: Okay.
 17 BY MR. KUVIN:
 18 Q. You mentioned before abortions from other
 19 girls. Have you had an abortion?
 20 MS. BLANTON: Objection.
 21 THE WITNESS: I'm asserting my Fifth Amendment
 22 Right.
 23 MS. BLANTON: You do not -- It's not even a
 24 Fifth Amendment Right. It's a right to privacy.
 25 You are not a Plaintiff or a Defendant in this

1 BY MR. KUVIN:
 2 Q. And you've got no problem talking about other
 3 people's drug habits, but you're still going to stand by
 4 a privilege objection or privacy objection as to your
 5 drug use?
 6 MS. BLANTON: With regard to drug use, I would
 7 instruct my client to assert her Fifth.
 8 BY MR. KUVIN:
 9 Q. Okay. So you've used marijuana before, have
 10 you not?
 11 A. I'm asserting my Fifth Amendment Right.
 12 Q. You've used Xanax before, have you not?
 13 A. I'm asserting my Fifth Amendment Right.
 14 Q. You've used cocaine before?
 15 A. I'm asserting my Fifth Amendment Right.
 16 Q. You've used LSD before?
 17 A. I'm asserting my Fifth Amendment Right.
 18 Q. You've used -- you used cocaine on a regular
 19 basis in the past, have you not?
 20 A. I'm asserting my Fifth Amendment Right.
 21 Q. You've used Xanax on a regular basis in the
 22 past, have you not?
 23 A. I am asserting my Fifth Amendment Right.
 24 Q. You continue to still use Xanax, cocaine,
 25 marijuana, and other illegal drugs, don't you?

1 suit.
 2 We've had these discussions earlier. It's the
 3 same objections.
 4 You do not need to answer that question
 5 without a Court Order.
 6 BY MR. KUVIN:
 7 Q. You talked about boys that have gotten blow
 8 jobs that aren't Plaintiffs in lawsuits.
 9 Have you given blow jobs before when you were
 10 14?
 11 MS. BLANTON: Objection. You do not need to
 12 answer that question.
 13 MR. CRITTON: Form.
 14 BY MR. KUVIN:
 15 Q. You talked about other people who had made sex
 16 videos. Did you ever make a sex video?
 17 MS. BLANTON: You do not need to answer that
 18 question.
 19 Same objection. And it's going to be the same
 20 objection.
 21 BY Mr. KUVIN:
 22 Q. Okay. You talked about whether [redacted] -- I'm
 23 sorry -- whether [redacted], the youngest girl that you brought
 24 to Jeffrey, was -- seemed emotionally traumatized or
 25 upset over the incident.

1 When is the last time you saw [REDACTED]?

2 A. On the back of some kid's crotch rocket at

3 Target when I was with my cousin a couple years ago,

4 maybe a year ago.

5 Q. Crotch rocket, you mean some kind of a --

6 A. Bike.

7 Q. -- fast motorcycle?

8 A. Yes.

9 Q. Did you talk to her?

10 A. No.

11 Q. Did you have -- when is the last time you ever

12 had any communication with her whatsoever?

13 A. When she tried getting me to bring her back to

14 Epstein.

15 Q. Back when she was 14?

16 A. Yes.

17 Q. So whether or not she regrets and feels bad

18 and has emotional trauma and is upset, much like you

19 testified that you are, you have no idea today?

20 MR. CRITTON: Form.

21 THE WITNESS: No idea about what?

22 BY MR. KUVIN:

23 Q. Whether she regrets what happened back then

24 when she was younger.

25 A. No, I don't care.

1 Q. You don't really care about any of these girls

2 and what they feel, do you?

3 MS. BLANTON: Objection.

4 THE WITNESS: No.

5 BY MR. KUVIN:

6 Q. You could care a less whether they're

7 emotionally traumatized or not?

8 A. Yes. I could care less.

9 MR. KUVIN: Okay. Perfect. Thank you.

10 That's all I got.

11 MR. CRITTON: Microphone.

12 RE-CROSS EXAMINATION

13 BY MR. HOROWITZ:

14 Q. Within your social circles when you were in

15 high school, you've identified several people who were

16 users and/or sellers of drugs, correct?

17 A. Yes.

18 Q. In your examination by Mr. Epstein's attorney,

19 do you remember telling us several people who you felt

20 were drug dealers or drug users? Yes?

21 A. Yes.

22 Q. How is it that you seem to know so many drug

23 users and sellers? How is it that you come into social

24 contact with all these people?

25 A. [REDACTED]'s a small town.

1 Q. And because of the small town, what?

2 A. I know a lot of people.

3 Q. And all -- many of them seem to be drug users

4 and drug sellers?

5 A. Yes.

6 Q. As you sit idle and sort of watch them while

7 they use and sell drugs or do you participate --

8 MS. BLANTON: Do not answer that question.

9 BY MR. HOROWITZ:

10 Q. -- and partake in the drug use and sales?

11 MR. CRITTON: Form.

12 MS. BLANTON: That question has been asked.

13 I've stated my full objection. I'm instructing her

14 to assert her Fifth Amendment Right. And if you

15 would like for her to do it again, she will.

16 BY MR. HOROWITZ:

17 Q. Isn't it true that the people who you

18 identified as drug users and drug sellers, you have

19 sold, purchased or consumed drugs with?

20 MR. CRITTON: Form.

21 MS. BLANTON: Do not answer that question.

22 And do not ask her another question that has

23 already been asked and her Amendments have been

24 asserted to -- her Fifth Amendments Rights have

25 been asserted. If you have a different question,

1 please move on.

2 BY MR. HOROWITZ:

3 Q. Isn't it true that like some of the other

4 girls you mentioned, you also slept around with

5 boyfriends while you were in high school?

6 MS. BLANTON: Do not answer that question. It

7 has been asked. I've asserted my objection.

8 Do you have another question --

9 MR. HOROWITZ: I have many more questions.

10 MS. BLANTON: -- or else this deposition is

11 over.

12 MR. HOROWITZ: I have many more questions.

13 MS. BLANTON: Do you have one that has not

14 been asked?

15 MR. HOROWITZ: I have many more questions.

16 BY MR. HOROWITZ:

17 Q. Isn't it true that you have had sexual

18 intercourse with Jane Doe 4? You've had sexual contact

19 with her?

20 MS. BLANTON: Objection.

21 THE WITNESS: Oh, what?

22 MS. BLANTON: Do not answer that question.

23 BY MR. HOROWITZ:

24 Q. Isn't it true that you slept with Jane Doe 4's

25 boyfriend?

1 MS. BLANTON: Do not answer the question.
 2 THE WITNESS: I'm done.
 3 MS. BLANTON: Do you have a question that has
 4 not -- you don't have to say anything.
 5 Do you have another question that has not been
 6 asked?
 7 BY MR. HOROWITZ:
 8 Q. You described Mr. Epstein to his lawyer as
 9 being a nice person; is that right? You were asked, is
 10 he nice? And you said, yes, he's nice?
 11 A. Yes.
 12 Q. In your mind, was it nice of Mr. Epstein to
 13 masturbate in front of you when you were a child?
 14 A. I don't know. I wasn't a child.
 15 MR. CRITTON: Form.
 16 BY MR. HOROWITZ:
 17 Q. When you were a 16 year old girl and
 18 Mr. Epstein was masturbating in front of you, exposing
 19 his genitals, was that a nice thing of him to do?
 20 MR. CRITTON: Form.
 21 THE WITNESS: I don't know.
 22 BY MR. HOROWITZ:
 23 Q. You have no opinion?
 24 A. I have no opinion.
 25 Q. When Mr. Epstein had his hand on his penis, on

1 A. I don't know.
 2 Q. You have no knowledge of her going into the
 3 champagne room and giving a lap dance to a grown man and
 4 taking off her clothes, correct?
 5 A. I don't know.
 6 Q. But that, if she were to do that, that would
 7 be something that's promiscuous?
 8 A. I don't know.
 9 MS. BLANTON: Object to the form.
 10 BY MR. HOROWITZ:
 11 Q. With regard to Jane Doe 4, other than a
 12 three-hour try out where she didn't continue to work at
 13 a strip club, you're not aware of her ever working at a
 14 strip club, correct?
 15 A. I don't know.
 16 Q. And with regard to Jane Doe 7, you have no
 17 knowledge of her working at a strip club, correct?
 18 A. I don't know.
 19 Q. Those would be the kinds of things that
 20 promiscuous girls would do, correct?
 21 A. I don't know.
 22 MR. CRITTON: Form.
 23 MS. BLANTON: Object to the form.
 24 BY MR. HOROWITZ:
 25 Q. You described Jane Doe 4, in your opinion, as

1 his shaft and he's stroking it and he's coming -- having
 2 orgasm, was that a nice thing of him to do to you?
 3 A. I don't know.
 4 MR. CRITTON: Let me object to the form. It's
 5 intimidating. It's trying to harass her.
 6 MS. BLANTON: Mine as well.
 7 MR. CRITTON: I think it serves no purpose.
 8 BY MR. HOROWITZ:
 9 Q. And when you look back on it, is that a nice
 10 memory that you have?
 11 MR. CRITTON: Form.
 12 THE WITNESS: I don't know.
 13 MS. BLANTON: Let the record reflect that it's
 14 after 6:00. You've been here for over seven hours
 15 and these questions not only serve to intimidate,
 16 harass and embarrass her, they're very ill willed
 17 and worded at this point.
 18 BY MR. HOROWITZ:
 19 Q. You described -- you described Jane Doe 3 as
 20 promiscuous?
 21 A. Yes.
 22 Q. Now, she wasn't the kind of girl who would
 23 give lap dances at a strip club, was she?
 24 A. I don't know.
 25 Q. You have no knowledge that she did that?

1 being not an honest person, correct?
 2 A. That's true.
 3 Q. And if we were to ask Jane Doe 4 today whether
 4 you were an honest person, would you agree that she
 5 would likely say that you were dishonest?
 6 MS. BLANTON: Object to the form. You're
 7 asking her to --
 8 MR. CRITTON: Form.
 9 THE WITNESS: I don't know.
 10 MS. BLANTON: -- speculate.
 11 BY MR. HOROWITZ:
 12 Q. You wouldn't be surprised if she said that you
 13 were a liar?
 14 A. I wouldn't be surprised if she told me she was
 15 a raging alcoholic lesbian who loved monkeys. It would
 16 not shock me.
 17 Q. And although you described Jane Doe 4 as being
 18 promiscuous for a period of years, you actually remained
 19 friends with her; is that right?
 20 A. Acquaintances.
 21 Q. More than acquaintances. You actually staged
 22 an intervention for her benefit; is that correct?
 23 MS. BLANTON: Is there a question?
 24 THE WITNESS: I pitied her, yes.
 25 BY MR. HOROWITZ:

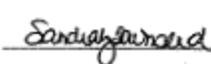
1 Q. Pardon me?
 2 A. Yes. I pitied her.
 3 Q. You cared for her enough you wanted to --
 4 A. I care for any woman that gets battered by
 5 their boyfriend or husband, yes.
 6 Q. And you wanted her to have a better life and,
 7 so, that's what you thought was the appropriate thing to
 8 do?
 9 A. I thought that was the appropriate thing.
 10 Q. So even though she had a tumultuous
 11 relationship and in your mind was promiscuous and a drug
 12 user, you still -- you still were within her social
 13 circles, right?
 14 A. I still wanted to help her.
 15 Q. You still went to parties with her where you
 16 claim that she used drugs?
 17 A. Not went to parties with her.
 18 Q. You went to parties -- you went to parties
 19 where you saw her and you were within close enough
 20 proximity that you could see her purportedly using
 21 drugs, right?
 22 A. It's called, keeping order.
 23 Q. Keeping whose order?
 24 A. Keeping order.
 25 Q. What does that mean?

1 A. I'm out in public. I'm going to be cordial
 2 whether I like you or not. That's just me.
 3 Q. But you stayed close enough to her that you
 4 could supposedly watch her use drugs?
 5 MS. BLANTON: Asked. Answered.
 6 BY MR. HOROWITZ:
 7 Q. Is that right?
 8 A. Sure, yes.
 9 Q. And not only that, you were sufficiently
 10 familiar with the relationship she had with her
 11 boyfriend, such that, you could see the type of
 12 tumultuous relationship that you've described to us?
 13 A. Yes.
 14 Q. You didn't try and stay out of her life; you
 15 kept in close contact with her so that you could know
 16 the ins and outs of her relationship with her boyfriend?
 17 A. I didn't stay too close to her.
 18 Q. What age or what grade do you think -- strike
 19 that.
 20 Can you have a specific recollection of Jane
 21 Doe 4 using drugs in the ninth grade?
 22 A. Yes.
 23 Q. What -- do you have a specific recollection of
 24 her using drugs in the tenth grade?
 25 A. I can't recall.

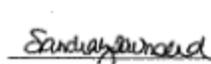
1 Q. Do you have a specific recollection of her
 2 using drugs in the 11th grade?
 3 A. Yes.
 4 Q. And in the 12th grade?
 5 A. Yes.
 6 Q. And would you agree that her -- any drug use
 7 she had increased over time?
 8 A. I don't know that.
 9 MR. CRITTON: Form.
 10 BY MR. HOROWITZ:
 11 Q. Did the types of drugs that she used increase
 12 over time, meaning, more substantial?
 13 A. No. It's the same drugs.
 14 Q. And you described, I think, one or two
 15 incidences of her breaking up and being with other --
 16 other guys when she was in break ups, right?
 17 A. Uh-huh.
 18 Q. What grade did that take place in?
 19 A. Well, she was with [REDACTED] her junior and 12th
 20 grade years, so it happened then.
 21 Q. Okay. And you described -- didn't you tell us
 22 that you felt that Jane Doe 3 used drugs?
 23 A. Jane Doe 3 did use drugs.
 24 Q. In what grades do you think she used drugs in?
 25 11th? 12th? Tenth? Ninth?

1 MR. CRITTON: Form.
 2 THE WITNESS: Tenth.
 3 BY MR. HOROWITZ:
 4 Q. Okay. Any -- any other grade?
 5 A. I can't recall.
 6 Q. And what ages do you think -- what grades do
 7 you think she was promiscuous, in your mind?
 8 A. I can't recall what grade she was in.
 9 Q. And when you describe someone as being
 10 promiscuous, are you comparing it to sort of your own
 11 values and morals or --
 12 MS. BLANTON: Object to the form.
 13 And do not answer that.
 14 THE WITNESS: I'm not going to.
 15 MR. HOROWITZ: No. I think I'm entitled to
 16 understand her foundation, the predicate upon which
 17 she's calling someone promiscuous.
 18 BY MR. HOROWITZ:
 19 Q. And who are you comparing that to?
 20 A. I'm not comparing it to anybody. Obviously
 21 when a girl is having a threesome in a bedroom, that's
 22 promiscuous to me.
 23 Q. And you were watching this?
 24 A. I walked in on it.
 25 Q. And you just kind of did what?

1 A. Shut the door. We were at a party.
 2 Q. And when you are dancing at strip clubs, do
 3 you ever give lap dances to two men at a time?
 4 MS. BLANTON: Object. Do not answer.
 5 MR. HOROWITZ: No other questions.
 6 MR. CRITTON: I have one question.
 7 RECCROSS EXAMINATION
 8 BY MR. CRITTON:
 9 Q. And Mr. Horowitz didn't want to follow up on
 10 it. But he said, he asked you what -- your definition
 11 of promiscuous. And you said, walking in or seeing
 12 someone in a threesome falls within your definition of
 13 promiscuous?
 14 A. Yes.
 15 Q. Who did you see in a threesome and where were
 16 you?
 17 A. Jane Doe 3.
 18 Q. Was with what, another girl and a guy? Two
 19 guys?
 20 A. Two guys.
 21 Q. What was she doing?
 22 A. I just saw her naked over the bed. That's it.
 23 MR. CRITTON: All right. That's all I have.
 24 RECCROSS EXAMINATION
 25 BY MR. HOROWITZ:

1 CERTIFICATE OF OATH
 2 STATE OF FLORIDA
 3 COUNTY OF PALM BEACH
 4
 5
 6 I, the undersigned authority, certify that
 7 [REDACTED] personally appeared before me and was duly
 8 sworn on the 10th day of November, 2009.
 9
 10 Dated this 20th day of November, 2009.
 11
 12
 13
 14
 15 
 16 
 17 Sandra W. Townsend, Court Reporter
 18 Notary Public - State of Florida
 19 My Commission Expires: 6/26/12
 20 My Commission No.: DD 793913
 21
 22
 23
 24
 25

1 Q. And what grade was she in when this supposedly
 2 took place?
 3 A. I can't recall.
 4 MR. HOROWITZ: Thank you.
 5 MR. CRITTON: You going to read?
 6 MS. BLANTON: Yes, please.
 7 VIDEOGRAPHER: Going off the record. This is
 8 the end of tape number five. The time is 6:12 p.m.
 9 (Witness excused.)
 10 (Deposition was concluded.)
 11
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1 CERTIFICATE
 2 STATE OF FLORIDA
 3 COUNTY OF PALM BEACH
 4
 5 I, Sandra W. Townsend, Court Reporter and
 6 Notary Public in and for the State of Florida at Large,
 7 do hereby certify that the aforementioned witness was by
 8 me first duly sworn to testify the whole truth; that I
 9 was authorized to and did report said deposition in
 10 stenotype; and that the foregoing pages numbered 157
 11 to 329, inclusive, are a true and correct transcription
 12 of my shorthand notes of said deposition.
 13
 14 I further certify that said deposition was
 15 taken at the time and place hereinabove set forth and
 16 that the taking of said deposition was commenced and
 17 completed as hereinabove set out.
 18 I further certify that I am not attorney or
 19 counsel of any of the parties, nor am I a relative or
 20 employee of any attorney or counsel of party connected
 21 with the action, nor am I financially interested in the
 22 action.
 23 The foregoing certification of this transcript
 24 does not apply to any reproduction of the same by any
 25 means unless under the direct control and/or direction
 of the certifying reporter.
 Dated this 20th day of November, 2009.

 Sandra W. Townsend, Court Reporter

1 DATE: November 20, 2009
 2 TO: [REDACTED]
 3 c/o Camille Blanton, Esquire
 4 MCINTOSH, SAWRAN, PELTZ & CARTAYA, P.A.
 5 1601 Forum Place, Suite 1110
 6 West Palm Beach, Florida 33401
 7 IN RE: [REDACTED] vs. Epstein
 8 CASE NO.: 502008CA037319XXXXMB AB
 9 Please take notice that on Tuesday, the 10th
 10 of November, 2009, you gave your deposition in the
 11 above-referred matter. At that time, you did not waive
 12 signature. It is now necessary that you sign your
 13 deposition.
 14 Please call our office at the below-listed
 15 number to schedule an appointment between the hours of
 16 9:00 a.m. and 4:30 p.m., Monday through Friday, at the
 17 Esquire office located nearest you.
 18 If you do not read and sign the deposition
 19 within a reasonable time, the original, which has
 20 already been forwarded to the ordering attorney, may be
 21 filed with the Clerk of the Court. If you wish to waive
 22 your signature, sign your name in the blank at the
 23 bottom of this letter and return it to us.
 24 Very truly yours,
 25 _____
 Sandra W. Townsend, FPR
 PROSE COURT REPORTING AGENCY
 250 S. Australian Avenue, Suite 1500
 West Palm Beach, Florida 33401

I do hereby waive my signature.

 I do hereby waive my signature:

 Cc: Via transcript: All Counsel of Record; file copy

1 ERRATA SHEET
 2 IN RE: [REDACTED] VS. EPSTEIN CR: S. TOWNSEND
 3 DEPOSITION OF: [REDACTED]
 4 TAKEN: 11/10/09
 5
 6 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
 7 PAGE # LINE # CHANGE REASON
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 Please forward the original signed errata sheet to this
 19 office so that copies may be distributed to all parties.
 20 Under penalty of perjury, I declare that I have read my
 21 deposition and that it is true and correct subject to
 22 any changes in form or substance entered here.
 23 DATE: _____
 24 SIGNATURE OF DEPONENT: _____
 25 _____

1 CERTIFICATE
 2 - - -
 3 THE STATE OF FLORIDA
 4 COUNTY OF PALM BEACH
 5 I hereby certify that I have read the
 6 foregoing deposition by me given, and that the
 7 statements contained herein are true and correct to the
 8 best of my knowledge and belief, with the exception of
 9 any corrections or notations made on the errata sheet,
 10 if one was executed.
 11
 12 Dated this ____ day of _____,
 13 2009.
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 19 _____
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