

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO:502008CA028051XXXXMB AB

█.

Plaintiff,

-vs-

VOLUME IV OF IV

JEFFREY EPSTEIN

AND █ █

Defendants.

_____ /

VIDEO-CONFERENCED AND VIDEOTAPED DEPOSITION OF █.

Tuesday, February 09, 2010
10:09 - 5:05 p.m.

250 Australian Avenue South
Suite 1500
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting
Job No.: 1296

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PROSE COURT REPORTING AGENCY, INC.

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PROCEEDINGS

THE VIDEOGRAPHER: We're back on the record at 1:48 p.m.

BY MR. LUTTIER:

Q. Okay, Ma'am. I want to add that during the morning session, I was asking you some questions. I just want to go over a couple of things. One of the first things I asked you this morning is whether you understood you were under oath today. And you indicated you did understand that?

A. Correct.

Q. Are you, did you, are you aware of the fact that it is a crime known as perjury to make a false statement under oath?

A. Correct.

Q. Are you also aware that it is a separate crime, a federal crime to make a false statement to an FBI agent?

A. Correct.

Q. And you've already admitted that you committed that federal crime; you lied to the FBI, according to you.

A. I was in fear of my son's life, correct.

APPEARANCES:

On behalf of the Plaintiff, [redacted] and [redacted]

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ALSO PRESENT: Jeffrey Epstein, via video conference
Daniel Downey, Videographer
Visual Evidence, Incorporated

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WITNESS: DIRECT CROSS REDIRECT RECROSS

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EXHIBITS

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Q. Now, I want to ask you one more time: Is there anything you want to correct about any of your testimony this morning, especially as it relates to working in places of employment that you have termed to be [redacted] at or about or near [redacted] [redacted]?

A. Correct. I'm fine on that.

Q. Okay. Isn't it a fact that on Saturday, January 30th, you went to [redacted]?

A. Yes.

Q. And you got there, what time, around 8:00?

A. Yes.

Q. And then at some point in time you left [redacted], did you not?

A. Yes.

Q. And you went to a place called [redacted] of Palm Beach, did you not?

A. Not that I recall. I don't know a name [redacted].

Q. Well, [redacted] would be the facility that's located right next door to [redacted]. You're familiar with that, aren't you?

A. I thought that was affiliated with [redacted].

Q. Well, so that we know --

1 (Cellphone interruption.)
 2 THE WITNESS: Oh, I'm sorry, my phone.
 3 MR. LUTTIER: Sure. Go ahead.
 4 THE WITNESS: Okay. Sorry.
 5 BY MR. LUTTIER:
 6 Q. There is a -- whether or not it's
 7 affiliated with [REDACTED], I don't know. When
 8 you referred to your testimony this morning that you
 9 didn't go anyplace other than [REDACTED] Rhinos and
 10 places affiliated did, with it, did you mean to
 11 include in those places that you went [REDACTED] of
 12 Palm Beach?
 13 A. I personally never heard of [REDACTED] of Palm
 14 Beach, but I know that, there, that [REDACTED] has
 15 a couple places affiliated with them.
 16 Q. What places do they have that are
 17 affiliated with them?
 18 A. The back and then there's an entrance to
 19 another place. That's all I know.
 20 Q. Well, tell me about this entrance to
 21 another place. What are you talking about?
 22 A. Well, in the back of [REDACTED] there is
 23 a little section that the dancers -- I don't know
 24 exactly what they do there, but that's where I do sell
 25 shoes and my lingerie.

1 And then there is another entrance that
 2 you can go through and then there is another -- it's
 3 like there's, I know that there's, there's a lot of
 4 doors. I don't know what they consist of. I don't
 5 know what they do there, but I know that they are
 6 affiliated. I thought that they were affiliated with
 7 [REDACTED], and that's where I also go to sell
 8 my shoes and purses.
 9 Q. Okay. Well, you talked about a place in
 10 the back of [REDACTED] that you gain access
 11 to by going through the [REDACTED]
 12 establishment?
 13 A. Yes.
 14 Q. All right. Now, what is this second place
 15 that you are talking about that you say is
 16 affiliated with [REDACTED]?
 17 A. Well, you can either go through out the back
 18 door of [REDACTED] and take a right, and then there
 19 is a place there that's affiliated with them.
 20 Q. Is there a name? Is there a separate
 21 entrance to the place?
 22 A. I -- they're connected.
 23 Q. Is there a separate name on this place?
 24 A. Not that I know of.
 25 Q. Okay. I'm talking about a place that's

1 located. I believe it's to the left side of
 2 [REDACTED] as you look at it. It's got a
 3 separate entrance. It's got neon signs on it?
 4 A. Okay.
 5 Q. And it's known as [REDACTED].
 6 You're aware of that place, aren't you?
 7 MR. EDWARDS: Form.
 8 THE WITNESS: I'm not aware of any name.
 9 BY MR. LUTTIER:
 10 Q. Well, you were in the establishment known
 11 as [REDACTED] on the evening of
 12 Saturday, January 30th, 2010, were you not?
 13 MR. EDWARDS: Form.
 14 THE WITNESS: If that's what it's called,
 15 then, yes. But, as long, as far as I know,
 16 [REDACTED], that's the name I know it as
 17 of, you know.
 18 BY MR. LUTTIER:
 19 Q. Well, this is a place that has a separate
 20 entrance. You don't go through the entrance of
 21 [REDACTED]. You go into a separate entrance
 22 for a place called [REDACTED].
 23 A. Well --
 24 Q. I want to make sure we're real clear here
 25 we're not playing semantics.

1 A. We're not playing what?
 2 Q. Semantics.
 3 A. Okay.
 4 MR. CRITTON: Word games.
 5 THE WITNESS: Oh.
 6 MR. LUTTIER: All right?
 7 THE WITNESS: Yeah.
 8 BY MR. LUTTIER:
 9 Q. And, and you were, in fact, in this place
 10 called [REDACTED] on Saturday, January
 11 30th, 2010, were you not?
 12 MR. EDWARDS: Object to the form.
 13 THE WITNESS: I definitely walked through
 14 an entrance and that I thought was affiliated
 15 with [REDACTED].
 16 BY MR. LUTTIER:
 17 Q. And there's a black female in there that
 18 works at the front desk, is there not? There was on
 19 Saturday night.
 20 A. Oh, I don't know. I don't know who works
 21 there. I don't know.
 22 Q. And the --
 23 A. I just know that I go into [REDACTED] and
 24 I sell my --
 25 Q. And --

1 A. -- items.
 2 Q. -- the name that you're known as is
 3 [REDACTED] isn't that right?
 4 A. I'm not known as [REDACTED]
 5 Q. That's the name you -- remember we were
 6 asking you about the cards you used to use?
 7 A. Yeah, I was known as [REDACTED] in '07 and '08.
 8 Q. So that's the name you've used in the past
 9 is [REDACTED]?
 10 A. Yes.
 11 Q. And in fact on Saturday, January 30th, you
 12 were working in [REDACTED] which was,
 13 to use your terms, a [REDACTED] were you not?
 14 A. No, I was not working there.
 15 Q. And you were charging \$120 for a half hour
 16 to perform services; isn't that right?
 17 A. No.
 18 Q. And you came out and told somebody your
 19 name was [REDACTED] and that that was your charge,
 20 didn't you not?
 21 A. No, I did not. All I do is sell shoes and
 22 purses there.
 23 MR. LUTTIER: Let me show you a picture
 24 here which we'll mark as, I guess we want to do
 25 it in order. It will be Exhibit 3.

1 (Defendant's Exhibit No. 3 was marked for
 2 identification.)
 3 THE WITNESS: This place, yeah, it's next
 4 to [REDACTED]
 5 MR. LUTTIER: Hold on. Hold on.
 6 THE WITNESS: Sorry.
 7 BY MR. LUTTIER:
 8 Q. I have to ask you a couple of questions.
 9 Do you recognize Exhibit 3?
 10 A. Yes, but what I would do, I would go out of
 11 [REDACTED] from the back and go into the back
 12 entrance of [REDACTED] or whatever this place is called.
 13 Q. So, so, now upon seeing the picture, you
 14 want to correct your testimony and say, in fact, you
 15 were in [REDACTED] on Saturday?
 16 A. I, from my understanding, from my knowledge, I
 17 thought that this place was owned by [REDACTED].
 18 Q. All right. The place of business that's
 19 depicted in Exhibit No. 3, were you in that place of
 20 business on Saturday, January 30th?
 21 A. Yes, selling my items.
 22 Q. And did you, in fact, on that night, on
 23 Saturday, January 30th, tell individuals that your
 24 name was [REDACTED] and that you charged \$120 per half
 25 hour?

1 A. No. I say to the girls, my name is [REDACTED] and
 2 they know that I sell all of my, all of my clothes and
 3 lingerie and shoes and everything else I sell.
 4 Q. But there is no doubt that now that you
 5 have seen this picture, you were in that
 6 establishment that is depicted on Exhibit No. 3 on
 7 January 30th, right?
 8 A. Correct.
 9 Q. And you drive a white Mitsubishi Gallant;
 10 is that right?
 11 A. Yes.
 12 Q. License plate number is [REDACTED] is that
 13 correct.
 14 A. I don't know my license plate number, but I
 15 definitely drive a white Mitsubishi Gallant.
 16 Q. And is, was that vehicle parked outside
 17 [REDACTED] of the Palm Beach on Saturday night,
 18 January the 30th?
 19 A. Yes, but like I said before, from my
 20 knowledge, I thought this was affiliated with [REDACTED]
 21 [REDACTED]
 22 Q. And that car --
 23 A. And they don't like me to park, they don't
 24 like me to park in front of [REDACTED] because
 25 there are so many clientele that goes in and out. So

1 they need as much parking space as they can.
 2 Q. And you stayed at [REDACTED]
 3 until what hour on the morning of Sunday which would
 4 be January 31st?
 5 A. I stayed until what time?
 6 Q. Yeah, the morning until -- what time on
 7 the morning of Sunday, January 31st, did you leave?
 8 A. Well, [REDACTED] I would go until
 9 closing like 5, 6. And then in the back of here, of
 10 [REDACTED], that's like, sometimes they have after
 11 parties there, something. This is what I hear from the,
 12 the manager at [REDACTED]. And like I said,
 13 sometimes I stay there and I have a couple of drinks.
 14 And I'm not sure what time I left.
 15 Q. I don't want to know --
 16 A. As long as I keep on selling shoes and
 17 lingerie, I'm the there.
 18 Q. I am not asking about sometimes. I am
 19 talking about Sunday morning, January 31st, 2010,
 20 what time did you leave on that day?
 21 A. I couldn't tell you that. I don't know.
 22 Q. Well, what's your best estimate?
 23 A. I don't know, sir.
 24 Q. Well, first of all you closed [REDACTED]
 25 [REDACTED] at, what, 5 in the morning?

1 A. I closed it?
 2 Q. Yeah, you were there until it closed?
 3 A. Yes.
 4 Q. And then you went over to [REDACTED],
 5 right?
 6 A. That I thought was [REDACTED] from the
 7 back.
 8 Q. Whatever.
 9 A. Okay.
 10 Q. And then, how much longer did you stay
 11 there?
 12 A. I stayed there a little while because there is
 13 more girls there that like to buy my items.
 14 Q. Now, let's talk about your trip to New
 15 York.
 16 A. Okay.
 17 Q. Tuesday, February 2nd, 2010. Remember I
 18 asked you earlier about whether you ever used any
 19 business cards?
 20 A. Yes.
 21 Q. When you went on this trip to New York,
 22 did you have any cards?
 23 A. No, not that I -- no.
 24 Q. Did [REDACTED] have any cards?
 25 A. Not that I know of.

1 Q. Did you, when you went to the Palm Beach
 2 International Airport, did you give the taxicab
 3 driver a card?
 4 A. Did I give him a card?
 5 Q. Yeah, you or [REDACTED], little business card?
 6 A. I didn't give him a card, no.
 7 Q. Did [REDACTED] give him a business card?
 8 A. Not that I know of.
 9 Q. When you went into the Palm Beach
 10 International Airport, your card -- do you recall
 11 going to a bar?
 12 A. Palm Beach International Airport, yeah, I went
 13 to a bar there --
 14 Q. What bar do you go to?
 15 A. -- because I totally missed the flight.
 16 Q. What bar did you go to?
 17 A. I think it was Fridays, if I am not mistaken
 18 or not. I don't know what it was called.
 19 Q. Who went to the bar with you?
 20 A. I went with [REDACTED] to the bar and it was just
 21 her and I.
 22 Q. And for how long was it just the two of
 23 you?
 24 A. For like ten minutes.
 25 Q. And then what happened?

1 A. And we started talking to people.
 2 Q. Who did you talk to in particular?
 3 A. I don't know anyone else.
 4 Q. Did you talk to a male there?
 5 A. Yeah.
 6 Q. Have him over at your table?
 7 A. He came closer to -- we were at the bar.
 8 Q. The three of you were talking, were you
 9 not?
 10 A. Yeah.
 11 Q. Do you remember the guy having a laptop?
 12 A. Yes.
 13 Q. What did you-all do on the laptop or what
 14 did he do on the laptop while you were there and you
 15 both were sitting there?
 16 A. Well, I told him that I modeled for [REDACTED]
 17 [REDACTED]. And I told him if he would like to see my
 18 pictures, to go onto [REDACTED] [REDACTED].
 19 Q. So, did you tell him about any other
 20 websites?
 21 A. Excuse me?
 22 Q. Did you tell him about any other websites?
 23 A. No, not that I recall.
 24 MR. LUTTIER: Let's mark this as
 25 exhibit -- what's this, 4?

1 THE COURT REPORTER: Four.
 2 MR. LUTTIER: Mark this as 4.
 3 MR. EDWARDS: Is Exhibit 1 and 2 marked --
 4 MR. LUTTIER: Yeah.
 5 MR. EDWARDS: -- in the previous depo?
 6 MR. LUTTIER: Yeah, the previous depo.
 7 Although I don't know where the exhibits are or
 8 they were.
 9 MR. EDWARDS: Okay.
 10 MR. LUTTIER: It was like answers to
 11 interrogatories. Something like that.
 12 MR. EDWARDS: Okay.
 13 (Defendant's Exhibit No. 4 was marked for
 14 identification.)
 15 BY MR. LUTTIER:
 16 Q. Let me show you what's been marked as
 17 Exhibit 4 and ask you if you can identify that.
 18 A. This is --
 19 MR. EDWARDS: Wait until he asks you a
 20 question.
 21 BY MR. LUTTIER:
 22 Q. Can you identify it?
 23 A. Yes.
 24 Q. What is it?
 25 A. This is -- I modeled for [REDACTED] [REDACTED] and it

5 (Pages 515 to 518)

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1 is their advertisement now.
 2 Q. And is this one of the pictures on your
 3 website?
 4 A. On my website?
 5 Q. Yeah, or your Facebook, I guess, account
 6 or MySpace, whatever it was.
 7 A. Yeah, I have posted it on there, yeah.
 8 Q. Is, was this one of the pictures you were
 9 telling us at your last deposition that you really
 10 wouldn't want your four-year-old son to see?
 11 A. No, that's fine if he sees this. This is,
 12 this is very legit. His mother modeled and I am
 13 actually very proud of this photo.
 14 Q. All right. Now, did you do anything else
 15 with this individual before you left the bar that
 16 you, you and [REDACTED] were talking to at the Palm Beach
 17 International Airport?
 18 A. Did we do anything with him?
 19 Q. Did you give him anything, either you or
 20 [REDACTED]?
 21 A. I don't recall giving him anything but --
 22 Q. Well, did you see [REDACTED] give him anything?
 23 A. No.
 24 Q. Did either one of you give him a business
 25 card?

1 Q. Did you do anything else that evening?
 2 A. Yes, we went out to dinner.
 3 Q. After you -- did you leave the apartment
 4 and go look around at Grand Central Station and then
 5 keep on walking around or did you come back to the
 6 apartment?
 7 A. We went back to the apartment.
 8 Q. Okay. And then there came a time after
 9 you came back from sightseeing that you left the
 10 apartment a second time?
 11 A. Yes.
 12 Q. And that was for what purpose?
 13 A. We went to Angelo's.
 14 Q. Okay. And how did you get to Angelo's?
 15 A. We got to Angelo's in a taxi.
 16 Q. A taxi?
 17 A. Uh-huh.
 18 Q. And that was about what time?
 19 A. Oh, jeez, maybe, maybe 9:00.
 20 Q. Between the time -- what time did you go
 21 looking at Grand Central Station?
 22 A. That was before 9:00.
 23 Q. Okay. And do you remember, do you recall
 24 that evening an individual by name of Martin
 25 Krouner?

1 A. I don't have any business cards. I don't --
 2 Q. Well, I don't -- you may want to be
 3 careful here. I don't want to trick you. I am not
 4 playing semantics. Did either you or [REDACTED] give him
 5 a business card?
 6 MR. EDWARDS: Object to the form.
 7 THE WITNESS: Not that I recall, no, sir.
 8 We had a few drinks and, and we were off to our
 9 flight.
 10 BY MR. LUTTIER:
 11 Q. And then you flew to New York and you took
 12 a cab and you went to this apartment that's located
 13 at [REDACTED] in New York; is that right? That
 14 would be the corner of [REDACTED]?
 15 A. [REDACTED] rings a bell.
 16 That's where we stayed?
 17 Q. Yeah.
 18 A. Yeah.
 19 Q. Now, on that evening, the first night that
 20 you got there on Tuesday, I think earlier you said
 21 you-all walked down a street and went to dinner; is
 22 that right?
 23 A. We walked down the street and we walked into
 24 a, I think it's Grand Central Station. I'm not sure
 25 because I'm not from there and we looked around. Yeah.

1 A. Do I know a man named Martin?
 2 Q. Uh-huh, Martin Krouner.
 3 A. No.
 4 Q. Do you remember getting in a black
 5 Series 5 BMW when you came out of the condominium?
 6 A. We, we did take a ride with a man.
 7 Q. Well, I thought you just told me you
 8 walked to the restaurant.
 9 A. No, I told you I took a cab to the restaurant.
 10 Q. Oh, took a cab to the restaurant?
 11 A. Yes.
 12 Q. Did you forget about getting in a car with
 13 this man?
 14 A. He took us a little sightseeing. No, I did
 15 not forget about that.
 16 Q. Was that before dinner?
 17 A. That was before dinner, yes.
 18 Q. Did you just fail to mention that or --
 19 this is different than the man who took you
 20 sightseeing later, isn't it?
 21 A. Yes.
 22 Q. Okay. So, tell me who Martin Krouner is.
 23 A. I don't know his name, if that is his name.
 24 Q. Well, the guy that picked up in the black
 25 BMW, who's he?

1 A. I guess a friend of [REDACTED].
 2 Q. Well, tell us how old this individual was.
 3 Describe him for us.
 4 A. He has not a lot of hair. He's about five-six
 5 maybe and a little chubby.
 6 Q. For what purpose were you -- and you never
 7 met him before?
 8 A. No.
 9 Q. [REDACTED] never met him before?
 10 A. No.
 11 Q. You didn't have any idea who he was?
 12 A. No.
 13 Q. You-all climbed in his car?
 14 A. Yeah, I think it was [REDACTED] friend.
 15 Q. Okay. What did [REDACTED] tell you about the
 16 guy?
 17 A. She's Chinese. She's like go, go; go, go have
 18 fun, go search the town.
 19 Q. So, where did you go with Martin?
 20 A. We ended up meeting him at Angelo's.
 21 Q. Wait a minute. You got -- first of all
 22 you got in Martin's car, right?
 23 A. I got into Martin's car, yes.
 24 Q. And then where did you go once you got in
 25 Martin's car?

1 A. We searched around the town.
 2 Q. What do you mean you searched around?
 3 A. We went sightseeing.
 4 Q. Okay. Do you remember where you went?
 5 A. And we went sightseeing.
 6 Q. Do you remember where you want
 7 sightseeing?
 8 A. Then we took a taxi. No, because I don't know
 9 the area.
 10 Q. You went sightseeing in Mr. Kroner's car,
 11 correct?
 12 A. Yes.
 13 Q. All right. And, and did there come a time
 14 that you got of Mr. Kroner's car?
 15 A. Yeah, and we looked around. It was flurring
 16 outside, so it was nice to feel the snow.
 17 Q. And where did you get out of the car?
 18 A. Sir, I don't know New York. I don't --
 19 Q. Well, was it at a restaurant? Was it at
 20 the pool? Was it back at the condo? Where was it?
 21 A. It was near a whole bunch of buildings.
 22 Q. By the way, did you take any pictures
 23 while you were up there?
 24 A. I did take pictures.
 25 Q. Take a picture of you and [REDACTED] and this

1 fellow here, Mr. Martin Krouner?
 2 A. If that's his name. I don't know if we took a
 3 picture of him, but we definitely took pictures of [REDACTED]
 4 and I.
 5 Q. And, and where did you take those
 6 pictures?
 7 A. Wherever we were.
 8 Q. Okay. And when this man brought you back,
 9 did he go to dinner with you?
 10 A. He ended up meeting us there, yes.
 11 Q. Did he drop you at the restaurant?
 12 A. He dropped us near so we can get there with a
 13 taxi. He dropped us somewhere off of the street and we
 14 went with a taxi.
 15 Q. So, he dropped you off and then you got a
 16 taxi to get there?
 17 A. To go to Angelo's, yeah.
 18 Q. And then he met you there later?
 19 A. Later on.
 20 Q. Okay. About what time?
 21 A. Oh, God, I don't know the times. Maybe this
 22 was around, maybe around -- I'm -- this is total
 23 ballpark, like 10 maybe.
 24 Q. Okay. And, and, and then after dinner
 25 what did you and [REDACTED] and he do?

1 A. Well, we took a taxi back to his car. And we
 2 went up to the, we went up to [REDACTED] room and he just --
 3 we just said bye.
 4 Q. And did you receive anything at all of
 5 value from this man?
 6 A. No.
 7 Q. Did you charge him anything?
 8 A. No.
 9 Q. Were you paid anything for the time you
 10 spent with him?
 11 A. No.
 12 Q. Now, who's Robert Fredrick Burke?
 13 A. Robert Fredrick Burke, I have no idea.
 14 Q. Well, on the next day on Wednesday,
 15 February 3rd, did you go sightseeing again?
 16 A. Yes, we did.
 17 Q. And you said that this fellow Bobby came
 18 to see you at the apartment sometime the morning of
 19 Wednesday, February 3rd?
 20 A. He came to see us, uh-huh. I'm not sure what
 21 time it was. I think it was around in the afternoon.
 22 Q. Okay. And then after he left, you and
 23 [REDACTED] did some more sightseeing?
 24 A. Yeah, we walked around town.
 25 Q. Do you remember getting in a vehicle with

1 somebody that night?
 2 A. Yes.
 3 Q. Who did you get in a vehicle with?
 4 A. I told you, I don't know his name.
 5 Q. Well, where did you, where did you meet
 6 this person?
 7 A. Everybody was [REDACTED] friend. [REDACTED] has a lot
 8 of friends.
 9 Q. Well, what did you know about the person?
 10 A. Nothing.
 11 Q. How old is the person?
 12 A. I told you, I don't know anything about him.
 13 Q. And what kind of vehicle did you get in?
 14 A. I don't even know the vehicle.
 15 Q. Toyota Highlander?
 16 A. Is it -- I don't know.
 17 Q. And what nationality is this individual?
 18 A. I have no idea.
 19 Q. And where did this individual take you?
 20 A. He took us to sightseeing and he took us to
 21 the Statue of Liberty, everywhere.
 22 Q. Did you receive anything of value from
 23 him?
 24 A. No.
 25 Q. Did you charge him anything?

1 A. I have no idea.
 2 Q. Were they a male's clothes or female's
 3 clothes?
 4 A. I didn't search through the garbage. I just
 5 know that I threw out the trash.
 6 Q. So you're telling me you don't know whose
 7 they were?
 8 A. No.
 9 Q. Okay. Do you know [REDACTED]?
 10 A. Yes, I do.
 11 Q. And how do you know [REDACTED]?
 12 A. We grew up together. Probably knew her since
 13 I was 12.
 14 Q. Have you ever been engaged in any kind of
 15 a business venture, regardless of whether it was a
 16 formally formed business venture like a corporation,
 17 but any kind of business venture with [REDACTED]?
 18 A. I went, we went to Jeffrey's together.
 19 Q. Any other kind of business venture, you
 20 and her?
 21 A. No.
 22 Q. Were you ever, did you ever represent or
 23 attempt to start a business venture with her?
 24 A. This is years ago.
 25 Q. How many years ago?

1 A. No.
 2 Q. You or [REDACTED]?
 3 A. I did not charge him anything.
 4 Q. How about [REDACTED]?
 5 A. I don't know what she does but, no, I don't
 6 think so.
 7 Q. Well, was there ever a time that you and
 8 [REDACTED] were not together in this person's presence?
 9 A. Other than me going to the restroom, no. We,
 10 I, we were pretty much together the whole time.
 11 Q. On the evening of February 3rd, 2010, do
 12 you recall throwing a bag of trash in the garbage?
 13 MR. EDWARDS: What date is that?
 14 MR. LUTTIER: The evening of February 3rd,
 15 2010, at approximately 9:00 p.m.
 16 THE WITNESS: In the evening.
 17 MR. LUTTIER: Just before you got in the
 18 Toyota Highlander.
 19 THE WITNESS: Yes, we did.
 20 BY MR. LUTTIER:
 21 Q. Okay. And do you recall what it was that
 22 was in that bag?
 23 A. There was whole bunch of clothes and
 24 everything that [REDACTED] did not want, so we threw it out.
 25 Q. And whose clothes were those?

1 A. Well, 13, 14, 15, like eight years ago.
 2 Q. Okay. So, this is 2010. We're talking
 3 about 2002?
 4 A. Yeah.
 5 Q. Okay. So tell us about the venture that
 6 you were forming with her?
 7 A. I don't know what you're talking about.
 8 Q. Well, you were thinking about something
 9 because you said years ago. You were the one that
 10 picked the date. So, what was it you were thinking
 11 about?
 12 A. No, I said years ago we, we knew each other.
 13 We used to hang out. Like we used to do little girl
 14 stuff, go in the pool and --
 15 Q. No, my question was, was there a business
 16 venture and you said it was years ago.
 17 A. It was years ago that I've known her. Any
 18 type of business venture, not that I recall.
 19 Q. Have you ever told anyone at all that you
 20 and [REDACTED] were forming a business venture or had a
 21 business venture?
 22 A. At 12, no, I don't --
 23 Q. At any, I don't care, right up until
 24 today.
 25 A. No. [REDACTED].?

1 Q. Did you ever have any sort of a business
 2 venture that involved in any way, shape, or form you
 3 and/or her taking showers?
 4 A. No.
 5 Q. Did you ever tell anybody you did?
 6 A. No.
 7 Q. Did you ever have any literature or
 8 written material describing such a venture?
 9 A. Not that I recall, sir.
 10 Q. Ever have anything that described such a
 11 venture or any costs associated with procuring those
 12 services if someone wanted to do that?
 13 A. Taking showers?
 14 Q. Well, taking showers or watching the two
 15 of you take showers or any combination or
 16 permutation that you can think of.
 17 A. Not that I can think of unless we were like
 18 stupid little girls who -- I don't recall anything about
 19 any shower or anything like that, no.
 20 Q. Did you ever tell anybody that you had
 21 such a business going?
 22 A. No.
 23 Q. Did you ever tell anybody you had such a
 24 business going with someone other than [REDACTED]?
 25 A. A business going, no.

1 Q. And you testified that she provided you
 2 with drugs?
 3 A. Yes.
 4 Q. All right. Now, who provided the drugs to
 5 [REDACTED]?
 6 A. I have no clue.
 7 Q. Well, who provided the drugs to you that
 8 you just claim you took when you were with [REDACTED]?
 9 A. I couldn't even say. Maybe, maybe [REDACTED].
 10
 11 Q. That's your boyfriend?
 12 A. At the time he was my boyfriend.
 13 Q. Well, he was your boyfriend. He became
 14 the father of your child, right?
 15 A. Yes.
 16 Q. Okay. I mean, that would qualify as a
 17 boyfriend, right?
 18 A. If that's what you call it.
 19 Q. He was a drug dealer, wasn't he?
 20 A. No.
 21 MR. EDWARDS: Form.
 22 BY MR. LUTTIER:
 23 Q. Did he provide drugs to you on more than
 24 one occasion?
 25 A. No, he, no, he, if anything, him and his

1 Q. I don't mean a formal thing. Did you ever
 2 tell anybody that you were involved in any kind of
 3 activity involving taking showers for which you got
 4 paid money?
 5 A. Definitely not. I don't -- I have never.
 6 Q. And when was the last time you talked to
 7 [REDACTED]?
 8 A. Oh, boy. It's been years. Ballpark three
 9 years maybe.
 10 Q. And where did you talk to her three years
 11 ago?
 12 A. At the trailer that I had my son at.
 13 Q. Now, your other friend, [REDACTED]. --
 14 A. Uh-huh.
 15 Q. -- when is the first time that you can
 16 recall having done any type of a drug with [REDACTED]?
 17 A. When we first started seeing Jeffrey we tried
 18 to numb each other with like downers, you know,
 19 Percocets or something just to ignore really what was
 20 going on between Jeffrey and us.
 21 Q. Well, at the last deposition you told us
 22 that [REDACTED]
 23 who we know to be [REDACTED] first took you
 24 to Jeffrey's. Do you recall that testimony?
 25 A. Yes.

1 friends got together and they were stupid and young and
 2 they did a couple of drugs, but I didn't want anything
 3 to do with them until I met Jeffrey. And then I wanted
 4 to numb myself to be around Jeffrey. And I know that I
 5 would take drugs from him occasionally.
 6 But he didn't like give them to me or sell
 7 them to me or anything like that.
 8 Q. Well, what did you do, go steal them from
 9 him or what?
 10 A. I would probably take him from his stash or
 11 something but --
 12 Q. So, he had a lot of drugs?
 13 A. No, not that I remember. I don't know where I
 14 got these drugs from. To tell you the truth, I really
 15 don't recall. I don't know if [REDACTED] brought them. I
 16 don't know if I brought them.
 17 Q. Well, did you give these drugs to [REDACTED]?
 18 A. No, not that I recall.
 19 Q. One thing you knew was that these were
 20 illegal drugs, right?
 21 A. Yes.
 22 Q. You knew it was against the law what you
 23 were doing?
 24 A. Yes, especially -- Jeffrey Epstein knew it was
 25 against the law to be fondling 13 and 14-year-old girls

1 too.
 2 MR. LUTTIER: Well, Jeffrey Epstein --
 3 move to strike as not responsive.
 4 BY MR. LUTTIER:
 5 Q. What Jeffrey Epstein told you was that you
 6 shouldn't drink and shouldn't do drugs, didn't he?
 7 A. He told me that he never drank or did drugs.
 8 He was so interested in what kind of drugs we were on.
 9 Q. So, notwithstanding what you knew to be
 10 clearly --
 11 A. He would ask, he would be asking us so how
 12 does Xanax make you feel, how does coke make you feel,
 13 how does Percocets make you feel, how does this make you
 14 feel.
 15 Q. He never asked you to take any of those
 16 drugs, did he?
 17 A. No, but he would --
 18 Q. He never gave you any of those drugs, did
 19 he?
 20 A. No.
 21 Q. And you claim he had all this money. He
 22 could have provided you with any drug he wanted if
 23 he wanted to give you a drug, couldn't he?
 24 A. I guess.
 25 Q. And he never provided you with one single

1 A. Probably.
 2 Q. Now, you remember going there with
 3 [REDACTED] don't you?
 4 A. Yes, I do.
 5 Q. Two occasions you went and she went in the
 6 room with you, didn't she?
 7 A. She went in the room with me at the beginning,
 8 at the first time, yes.
 9 Q. Went in the room the second time too,
 10 didn't she?
 11 A. I, I think so. I'm not sure about that.
 12 Q. Are you aware that --
 13 A. I bet you have pictures on that, huh.
 14 Q. Are you aware that [REDACTED] been deposed?
 15 A. Have been what?
 16 Q. Has been deposed, gone through the same
 17 process you are?
 18 A. Oh, yes, of course. She should be.
 19 Q. How are you aware of that fact?
 20 A. Excuse me?
 21 Q. How are you aware of that fact?
 22 A. Everybody's been deposed. Most all, most of
 23 all these girls have been deposed.
 24 Q. Who told you that?
 25 A. You know, the girls talk.

1 illegal drug and told you he never touched drugs?
 2 A. No, but that's not his crime. He fondled me
 3 when I was 13 years old. He didn't sell me drugs.
 4 Sorry, he just molested me.
 5 MR. LUTTIER: Move to strike.
 6 BY MR. LUTTIER:
 7 Q. He never provided you with one illegal
 8 drug, did he?
 9 A. No.
 10 Q. You went and got those all on your own?
 11 A. Yes.
 12 Q. You and your friends would go and take all
 13 kinds of illegal drugs?
 14 A. Yes, because I was scared to be around an old
 15 man when he is touching my vagina and masturbating with
 16 his cock in front me ejaculating all over himself, so
 17 yes, I would, I think you would take drugs too.
 18 Q. So, were you so scared that you said I'm
 19 not going anymore?
 20 A. He was like our master. He's like [REDACTED]
 21 [REDACTED] master. He does, anything he says, we do
 22 because we are intimidated by him. We were scared of
 23 him.
 24 Q. So, if he said run out in front of
 25 traffic, you would?

1 Q. Okay.
 2 A. It get's around town and it's in the newspaper
 3 every weekend, so how can you not know?
 4 Q. Did you talk to [REDACTED]
 5 A. No, I did not.
 6 Q. Okay. So, how did you know [REDACTED] had
 7 been deposed if she was deposed?
 8 MR. EDWARDS: Object to the form to the
 9 extent --
 10 THE WITNESS: Of course she's been
 11 deposed.
 12 MR. EDWARDS: Hold on. Hold on -- to the
 13 extent that you're asking for attorney-client
 14 privilege information which you did --
 15 MR. LUTTIER: No.
 16 MR. EDWARDS: -- in the first deposition
 17 and it sounds like you're going there again --
 18 MR. LUTTIER: I don't want to know
 19 anything your lawyer said.
 20 MR. EDWARDS: -- about talking to my
 21 client.
 22 BY MR. LUTTIER:
 23 Q. I don't want to know anything your lawyer
 24 said. Have you seen a transcript of [REDACTED]
 25 deposition?

1 MR. EDWARDS: Object to the form. If she
 2 has seen a transcript, that would obviously
 3 being something that her attorney has shown
 4 her. That is not something she would have seen
 5 independent of that. So that would be
 6 protected information.

7 MR. LUTTIER: I, I mean, I don't think --
 8 I think if you show her a copy of a deposition,
 9 that is not protected by attorney-client
 10 privilege. If you had a discussion with her, I
 11 agree with you, whatever your discussions were.
 12 But the fact that you showed her the transcript
 13 I don't think is protected by the privilege.

14 BY MR. LUTTIER:

15 Q. Have you ever seen a copy of the
 16 transcript of [REDACTED] deposition?

17 A. Not that I know of.

18 Q. Well, did you know that -- or strike that.

19 When you and [REDACTED]
 20 [REDACTED] were with Mr. Epstein on the second
 21 occasion when she took you there, isn't it true that
 22 you began a conversation with Jeffrey discussing
 23 what you and your mother did and how much you
 24 charged for various things?

25 A. False.

1 A. Am I religious?

2 Q. No, do you have a religious affiliation?

3 Are you associated with a particular [REDACTED]?

4 A. Yes.

5 Q. Protestant, Catholic, Jewish?

6 A. Yes, I am.

7 Q. What [REDACTED] would that be?

8 A. I believe in Jesus Christ.

9 Q. Any particular organized -- do you know
 10 what I mean by organized religion? There's, there's
 11 a bunch --

12 A. I would like to call myself a Christian but I
 13 believe that the Lord, Catholics, Jews, Buddhism, it
 14 doesn't matter because it shouldn't be judged. It
 15 shouldn't be organized. The Lord doesn't -- the Lord
 16 doesn't organize anything. I just know that I am, I am
 17 very spiritual and I do love the Lord very much.

18 Q. Okay. So you would characterize yourself
 19 just as a, for lack of a better term Christian?

20 A. I am very spiritual.

21 Q. Okay.

22 A. And I pray every day.

23 Q. Do, do you participate in an organized
 24 religion?

25 A. Do I go to church?

1 Q. Sexual nature.

2 A. No.

3 Q. Is there any reason why [REDACTED]
 4 would want to make that story up?

5 MR. EDWARDS: Object to the form.

6 THE WITNESS: I have no idea.

7 BY MR. LUTTIER:

8 Q. And isn't it true that when you began --

9 A. She knew Jeffrey more than I did.

10 Q. Well, didn't --

11 A. This is the first time or second time I had
 12 ever been with Jeffrey. I didn't tell him anything;
 13 only the questions he asked me.

14 Q. And, and isn't it true that when you began
 15 to talk to Mr. Epstein and discuss with him what you
 16 and your mom did and the prices you would charge for
 17 things that Mr. Epstein asked [REDACTED] to leave
 18 the room?

19 A. I don't even know why my mother is brought up
 20 in this because, no, I would never talk about my mother
 21 as being a prostitute. She did not raise me like that.
 22 My mother is a very beautiful person inside and out and
 23 she would never raise me like that.

24 Q. By the way, what is your -- do you have a
 25 religious affiliation?

1 Q. Yeah.

2 A. Yes.

3 Q. And where did you go?

4 A. I've been to [REDACTED] I've been to
 5 [REDACTED]

6 Q. When was the last time you were at [REDACTED]
 7 [REDACTED]?

8 A. In December '08.

9 Q. And where did you go, for Christmas?

10 A. Before Christmas.

11 Q. Okay. And when was the last time you were
 12 at [REDACTED]?

13 A. Maybe September '08.

14 Q. Okay. Are you members of either of those
 15 churches or you just went to them?

16 A. If you want to call me a member, I --

17 Q. Are you a registered in them?

18 A. -- I attend, I attend [REDACTED], yes.

19 Q. Do you attend it with some degree of
 20 regularity?

21 A. Yes.

22 Q. And how often?

23 A. As often as I can.

24 Q. Okay. Well, I mean, I don't want to pin
 25 you down to a specific number of days, but how many

1 days a month would you say on average you go?
 2 A. As of right now, one, unfortunately.
 3 Q. And when you say unfortunately, are you
 4 unable to go more days?
 5 A. No, I would love to go more days.
 6 Q. Okay. Was there something that prevents
 7 you from going more days?
 8 A. I have a busy life.
 9 Q. Okay. What is it that you're doing that
 10 prevents you from going more days.
 11 A. Well, I am trying to get my son enrolled into
 12 Christian school, and there's a lot of bills that need
 13 to be paid and things that need to be done, errands that
 14 need to be ran, clothes that need to be washed, food
 15 that needs to be bought, time I need to spend with my
 16 son.
 17 Q. So, it's errands and clothes, laundry,
 18 purchasing groceries and stuff, and time with your
 19 son that prevents you from being able to attend more
 20 frequently; is that right?
 21 MR. EDWARDS: Object to the form.
 22 THE WITNESS: Sure.
 23 BY MR. LUTTIER:
 24 Q. You set your own work hours, right?
 25 A. Yes.

1 Q. Your mother is [REDACTED], and I may get
 2 this name sort of, [REDACTED] is it?
 3 A. Yeah.
 4 Q. Did I pronounce it right?
 5 A. No.
 6 Q. How you do pronounce that?
 7 A. [REDACTED].
 8 Q. [REDACTED]. And is she currently married?
 9 A. No. Can I have a tissue?
 10 Q. And where does she currently live?
 11 A. In [REDACTED].
 12 Q. In what development?
 13 A. I don't know what the development's called.
 14 MR. EDWARDS: Can we take a split second
 15 break to take grab a tissue?
 16 MR. LUTTIER: Sure.
 17 MR. EDWARDS: I don't see one right now.
 18 THE VIDEOGRAPHER: Going off the record at
 19 2:28 p.m.
 20 (A brief recess was held.)
 21 THE VIDEOGRAPHER: We're back on the
 22 record at 2:32 p.m.
 23 BY MR. LUTTIER:
 24 Q. Okay. You're saying you don't know the
 25 development that she lives in [REDACTED]?

1 A. You guys have been there before. You should
 2 know.
 3 Q. It's the same house she's always lived in?
 4 A. No. She hasn't lived there her whole life.
 5 Q. Okay. But I mean while you were a kid,
 6 when, when you were living with her; is it the same
 7 place that she lived in?
 8 A. No.
 9 Q. How long has she been living where she is
 10 now?
 11 A. I don't know. There's been a couple of years
 12 that my mother and I haven't talked.
 13 Q. Well, when was the last time you talked to
 14 your mother?
 15 A. Today.
 16 Q. And, and when did you talk to her?
 17 A. This morning.
 18 Q. And why did you talk to her this morning?
 19 A. So she could pray with me over the phone.
 20 Q. And when was the last time you talked to
 21 her prior to this morning?
 22 A. Last night.
 23 Q. Did I misunderstand? I thought you said
 24 there was a --
 25 A. There was a period in my life that we didn't

1 talk.
 2 Q. Okay. So that's some past period of time?
 3 A. Yes.
 4 Q. When did that change?
 5 A. Around May '09.
 6 Q. And what is it that caused the change in
 7 May of '09?
 8 A. I was living my life and she was living hers.
 9 Q. What does that mean?
 10 A. I was living my life and she was living hers.
 11 Q. Okay. Why did that, why did that
 12 facilitate --
 13 A. She was taking care of my sister that has
 14 [REDACTED] and they were going through a lot, so I left it
 15 alone.
 16 Q. My question was what caused in May of '09
 17 this period of estrangement between you and your
 18 mother to end?
 19 A. I just told you.
 20 Q. You said that your mother --
 21 A. My mother and I, she had -- my mother was
 22 taking care of my sister who has severe [REDACTED].
 23 Q. That's [REDACTED] ?
 24 A. Yes.
 25 Q. Okay. You mean during your period of

1 estrangement?
 2 A. Yes.
 3 Q. Okay. So, you didn't communicate with her
 4 because she was taking care of your sister?
 5 A. Yes.
 6 Q. Did something happen in May of '09 that
 7 changed all that?
 8 A. My sister moved away.
 9 Q. And where did she go to?
 10 A. [REDACTED].
 11 Q. And, and when she moved, did she go with a
 12 boyfriend?
 13 A. Yes.
 14 Q. And who is that?
 15 A. His name is [REDACTED].
 16 Q. Do you know his last name?
 17 A. No.
 18 Q. And she's still living in [REDACTED]?
 19 A. Yes.
 20 Q. Now, what's the relationship between you
 21 and your sister [REDACTED]?
 22 A. She's, she has like -- she's a little slow, so
 23 we can't really relate but other than that I love her.
 24 Q. Well, haven't you in the past been violent
 25 toward your sister?

1 A. Excuse me?
 2 Q. Did your mother ever discuss with you
 3 whether she had any conversations about you with
 4 anybody else with respect to this lawsuit?
 5 MR. EDWARDS: Is this in addition or
 6 different than the previous discussion that was
 7 discussed at the first deposition?
 8 MR. LUTTIER: I won't know until she
 9 answers it.
 10 MR. EDWARDS: But is this a separate
 11 occurrence from what she was asked at the last
 12 deposition?
 13 THE WITNESS: No, she's never discussed
 14 anything else with anyone else, no.
 15 BY MR. LUTTIER:
 16 Q. Okay.
 17 A. Not to my knowledge.
 18 Q. And if your mother told anybody that
 19 historically as a child you used [REDACTED] would she be
 20 telling the truth?
 21 A. Yes.
 22 Q. Do you who [REDACTED] is?
 23 A. Yes, I do.
 24 Q. And who is that?
 25 A. Her current boyfriend.

1 A. Yeah.
 2 Q. And tell us exactly what you did to your
 3 sister.
 4 A. Well, when I was 14, 15, 14, I was like
 5 mentally abusive to her because I guess I was just
 6 taking out everything, all of my pain from what was
 7 going on with Jeffrey, and I would just take it out all
 8 on her.
 9 Q. What do you mean by you would take it out
 10 on her?
 11 A. I was mentally abusive to her.
 12 Q. Well, describe what it is you actually
 13 did.
 14 A. She stuttered; I would make fun of her. She
 15 has [REDACTED]; I wouldn't respect it.
 16 Q. And did your sister actually have to get a
 17 restraining order against you?
 18 A. No.
 19 Q. Did your sister ever get a restraining
 20 order against you?
 21 A. Not that I know of. She's slow. She's not
 22 all there. She has like part [REDACTED].
 23 Q. Now, did your mother discuss with you
 24 about whether she ever had any discussions about you
 25 with anybody else?

1 Q. And do you believe him to be a truthful
 2 individual?
 3 A. Yes.
 4 Q. And how long has he known your mother?
 5 A. For 15 years.
 6 Q. Do you know of anything he has told
 7 anybody else about what it is your mother used to do
 8 for a living?
 9 A. No.
 10 Q. Is the first time that you've heard any
 11 reference to your mother being a prostitute in this
 12 case?
 13 A. No.
 14 Q. When else have you heard that?
 15 A. I have never heard that my mother was a
 16 prostitute.
 17 Q. So, what I am saying is, is the first time
 18 that you have heard that issue even come up in this
 19 case?
 20 A. This is the first time I am hearing this, yes.
 21 Q. Did you discuss with your mother the
 22 activities you were engaging in with Mr. Epstein at
 23 the time that you were engaging in them?
 24 A. I kept everything a secret until years later
 25 when after I had my son and then I told her what went

1 on.
 2 Q. Earlier you said at 15 you worked for
 3 [REDACTED]?
 4 A. Yes.
 5 Q. And my notes are unclear. I believe I
 6 asked you, did you tell them how old you were. Do
 7 you remember me asking you that question?
 8 A. (Witness nods head).
 9 Q. And what did you respond?
 10 A. I told them I was 19.
 11 Q. Okay. Did you provide them with any kind
 12 of proof?
 13 A. No.
 14 Q. And why did you lie to them and tell them
 15 you were 19 if you were really 15?
 16 A. Because I wouldn't be able to work there.
 17 Q. Did you tell other people that you were
 18 older than you really were?
 19 A. Yes.
 20 Q. Who else did you tell you were older than
 21 you really were?
 22 A. Probably everybody I came across.
 23 Q. So, that would be many people?
 24 A. Yes.
 25 Q. All of the various adult entertainment

1 THE WITNESS: I worked at [REDACTED]
 2 [REDACTED] Once I turned 18, I told everybody my
 3 age.
 4 BY MR. LUTTIER:
 5 Q. Well, you worked at a place called [REDACTED]
 6 when you were 14, didn't you?
 7 A. [REDACTED] [REDACTED]. I told them I was 19 as well.
 8 Q. When you were how old, 14?
 9 A. Yes.
 10 Q. Okay. And then what, what was the next
 11 place you did, you went to do topless dancing?
 12 We'll do [REDACTED] separate from topless dancing.
 13 A. I don't know. I worked at [REDACTED] when
 14 I was 14. I worked at [REDACTED] when I was
 15 15, and I worked for Jeffrey throughout all those years.
 16 Q. You worked for a lot of other places
 17 besides [REDACTED] and [REDACTED],
 18 didn't you?
 19 A. Not when I 15.
 20 Q. Well, I want to start there and keep on
 21 going.
 22 A. We already know the places I've worked at.
 23 We've been through this. We've went through this for
 24 the last deposition.
 25 Q. That's why --

1 places you worked at. The places, the topless bars
 2 you worked at, did you tell all of them you were
 3 older than you really were?
 4 A. The period of time when I worked at [REDACTED]
 5 [REDACTED] I told everyone I was 19. Jeffrey knew
 6 how old I was. And Jeffrey new how old every girl I
 7 brought there was, and he wanted young girls all the
 8 time.
 9 Q. Does that have anything to do with the
 10 question that I asked?
 11 MR. LUTTIER: I move to strike.
 12 THE WITNESS: The question you asked has
 13 nothing do with Jeffrey.
 14 MR. LUTTIER: Let's, let's go back. If
 15 you will read the question that I asked. If
 16 you will listen to this question, that's the
 17 one I would like you to answer.
 18 THE WITNESS: I know you guys love to get
 19 paid but --
 20 (The requested portion of the record was
 21 read by the reporter.)
 22 THE WITNESS: At what period of time?
 23 MR. LUTTIER: At any time. From the time
 24 you first worked at one to the last time you
 25 worked.

1 A. And we've already been through this for this
 2 deposition.
 3 Q. -- I am giving you the chance to
 4 summarize, so let's just go down and --
 5 A. You already know the places I worked.
 6 Q. I am asking you as to each one, how old
 7 you told them you were.
 8 A. When I was underage, I told them I was 19
 9 years old.
 10 Q. Every place that you worked?
 11 A. Yes. Except Jeffrey's, Jeffrey knew that I
 12 was 13. I'm sick of this.
 13 Q. So, at [REDACTED] you told them 19. Is that
 14 just the number you picked?
 15 A. On advice of counsel I am invoking my Fifth
 16 Amendment rights under the United States constitution.
 17 MR. EDWARDS: Do you want to take a break
 18 or are you all right?
 19 MR. LUTTIER: Yeah, do you want to take a
 20 break?
 21 THE WITNESS: No. I want to get this done
 22 and over with. I am sick of it. Jeffrey is --
 23 it's disgusting.
 24 BY MR. LUTTIER:
 25 Q. Flirts you told them you were 19?

1 A. I was -- on advice of counsel, I am invoking
 2 my Fifth Amendment rights under the United States
 3 Constitution.
 4 Q. [REDACTED], whatever, [REDACTED], whatever it
 5 was, you told them you were 19?
 6 A. [REDACTED].
 7 Q. [REDACTED], whatever.
 8 A. I was of age.
 9 Q. Okay. How about when you were at [REDACTED]
 10 [REDACTED], were you of age then?
 11 A. [REDACTED].
 12 Q. [REDACTED] Showgirls?
 13 A. Yes, I was of age.
 14 Q. And how about [REDACTED], were you
 15 of age then?
 16 A. On advice of counsel I invoke my Fifth
 17 Amendment rights under the United States Constitution.
 18 Q. Did you work at [REDACTED]?
 19 A. On advice of council I'm invoking my Fifth
 20 Amendment rights under the United States Constitution.
 21 Q. And what work did you do at [REDACTED]
 22 [REDACTED].
 23 A. I'm over this shit.
 24 MR. EDWARDS: Let's take a break.
 25 THE WITNESS: No. On advice of counsel I

1 a--
 2 A. Yes.
 3 Q. -- store?
 4 A. Yes.
 5 Q. And that was upsetting to you?
 6 A. Yes.
 7 Q. Why was it upsetting to you?
 8 A. I was trying to say hello to my little sister
 9 who was three at the time. And [REDACTED] was mad at my
 10 father and she didn't want me talking to my little
 11 sister. So, she doesn't know the American rights
 12 because she's from Mexico and she totally mazed me when
 13 I was trying to hug my little sister.
 14 (Mr. Goldberger entered the deposition
 15 room.)
 16 THE WITNESS: I just hope Jeffrey gets
 17 what he deserves.
 18 BY MR. LUTTIER:
 19 Q. And what's that, Ma'am?
 20 A. Punishment for putting us girls through all
 21 this.
 22 Q. That is those things that you are talking
 23 about the times that you elected to go back to his
 24 house and get paid to give him massages?
 25 A. He demanded us to over the phone, sir.

1 am invoking my Fifth Amendment rights under the
 2 United States Constitution.
 3 BY MR. LUTTIER:
 4 Q. Are you fearful that you're going to be
 5 prosecuted for something about [REDACTED]?
 6 A. No.
 7 Q. So, well then, what are you asserting the
 8 Fifth Amendment for?
 9 A. Because I want to.
 10 Q. Because what?
 11 A. Because I want to.
 12 MR. EDWARDS: Listen, don't engage with
 13 him. Just read.
 14 BY MR. LUTTIER:
 15 Q. Do you know [REDACTED]
 16 (phonetic).
 17 A. I know a [REDACTED].
 18 Q. Okay. And who is that?
 19 A. My step-mother.
 20 Q. Married to your father, [REDACTED].?
 21 A. Yes, sir.
 22 Q. And have you had a confrontation with her?
 23 A. What kind of confrontation is this now?
 24 Q. Did you ever have a confrontation with
 25 her, a physical confrontation in the parking lot of

1 Q. But nobody made you do it, right?
 2 A. No. But Jeffrey demanded us for us to do it.
 3 And as young girls we were scared of Jeffrey. And you
 4 know what, he will get what he deserves.
 5 Q. Let's see. You lived out [REDACTED] by
 6 [REDACTED]?
 7 A. Yes, I did.
 8 Q. He lived in Palm Beach?
 9 A. Yes.
 10 Q. How many miles was it, would you say
 11 between those two houses?
 12 A. I don't know, five, six.
 13 Q. And you didn't, you didn't have a car
 14 because you weren't driving, right?
 15 A. No. He sent taxies to my house to come get
 16 me.
 17 Q. So, then you could have said I am not
 18 getting in any of the taxies you wanted me to. You
 19 could have said I'm not going, just like a bunch of
 20 your friends did, right? They said after, boom, I
 21 don't want to go anymore, right?
 22 A. I could have said no.
 23 Q. As a matter of fact you had friends that
 24 you took, you found them, Jeffrey Epstein didn't
 25 find them, you found them.

1 A. Yeah. Because he wanted me to find them. He
2 said you better find me a girl the next day, or I am not
3 going to call you anymore.

4 Q. And you took them to Jeffrey Epstein's and
5 you told them don't worry, this is what's going to
6 happen, it's easy money, right?

7 A. Yeah, because I was tried of Jeffrey.

8 Q. And some of those girls went one time and
9 said they didn't want to go back, right?

10 A. Correct. Because they were afraid of Jeffrey.

11 Q. And you could have done the same thing,
12 couldn't you?

13 A. Correct.

14 Q. But you wanted the money?

15 A. I was a poor little girl who couldn't even
16 afford a pair of shoes, yes.

17 Q. You wanted the money?

18 A. Yes.

19 Q. And not only did you want the money but
20 you wanted to make money taking other girls there?

21 A. Yes.
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4 MR. EDWARDS: Objection, asked and
5 answered.
6 BY MR. LUTTIER:
7 Q. If there isn't any, fine. If there is I
8 want to get them that's all. Do you know of any
9 others?
10 A. No.
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16 (Pages 559 to 562)

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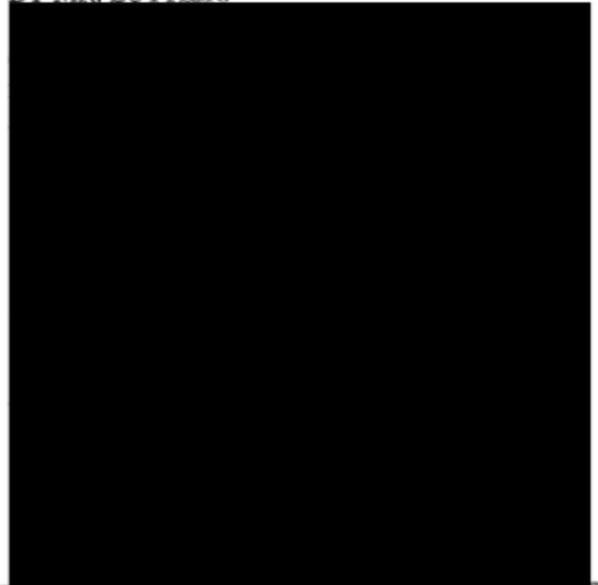
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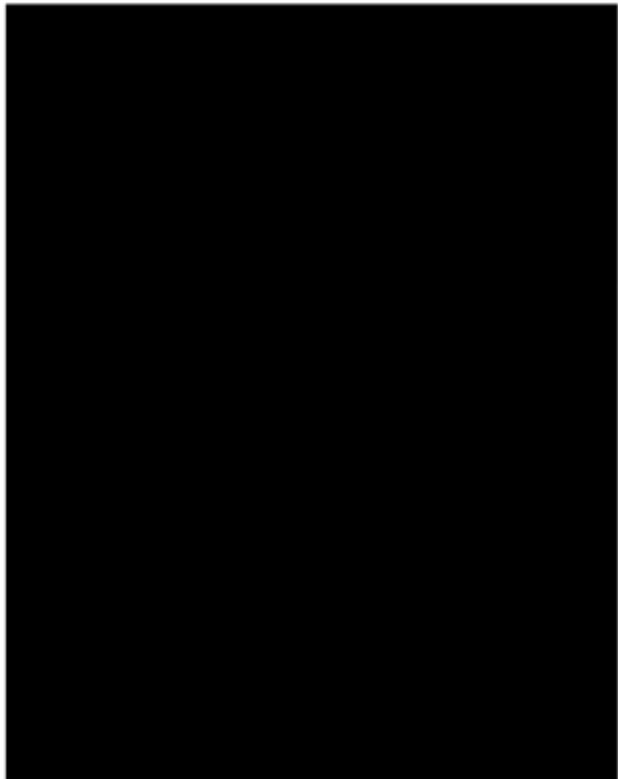


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responsive. Please, listen to the question.
The court reporter is going to read it back and
just answer my question.
(The requested portion of the record was
read by the reporter.)
THE WITNESS: No.
BY MR. LUTTIER:

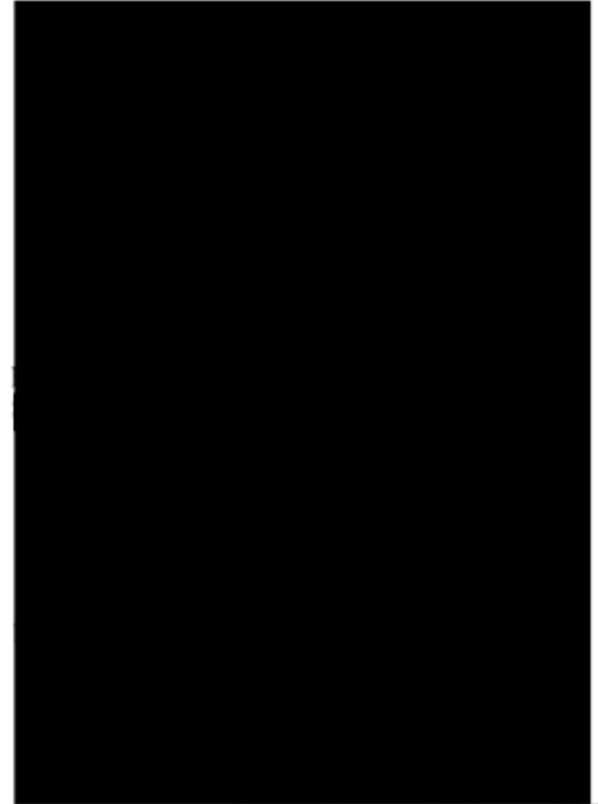


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MR. LUTTIER: Move to strike. Not

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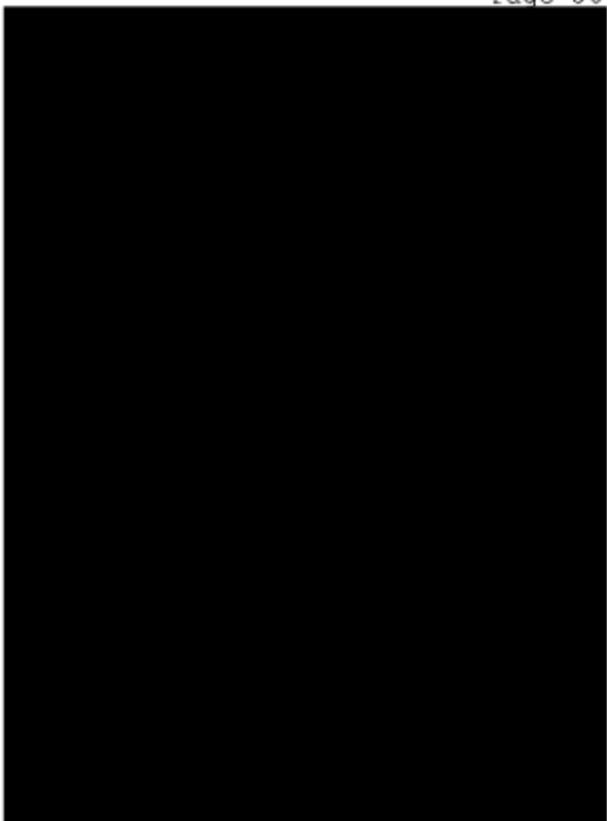
17 (Pages 563 to 566)

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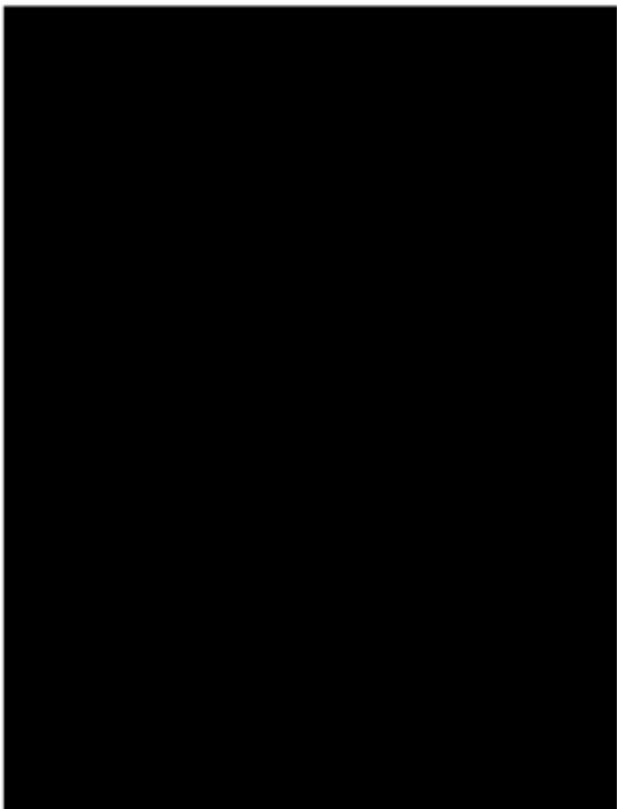
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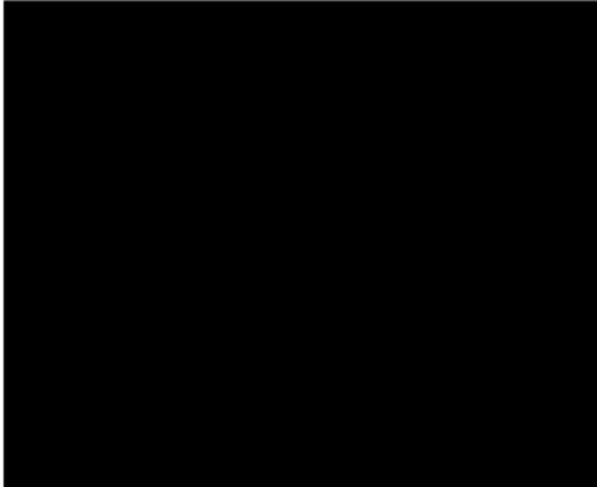
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Q. And you last saw Mr. Epstein in 2005?
A. I went to his house pregnant when I was -- 2006, or no, I was pregnant. I had my son 2005, and then I went to his house after I was pregnant.
Q. I believe you told us in the last deposition the latest you could have seen him was September of '05. Are you changing that or is that correct?
A. Sir, you know what, when people go through a lot of drama in their life, they choose not to really

18 (Pages 567 to 570)

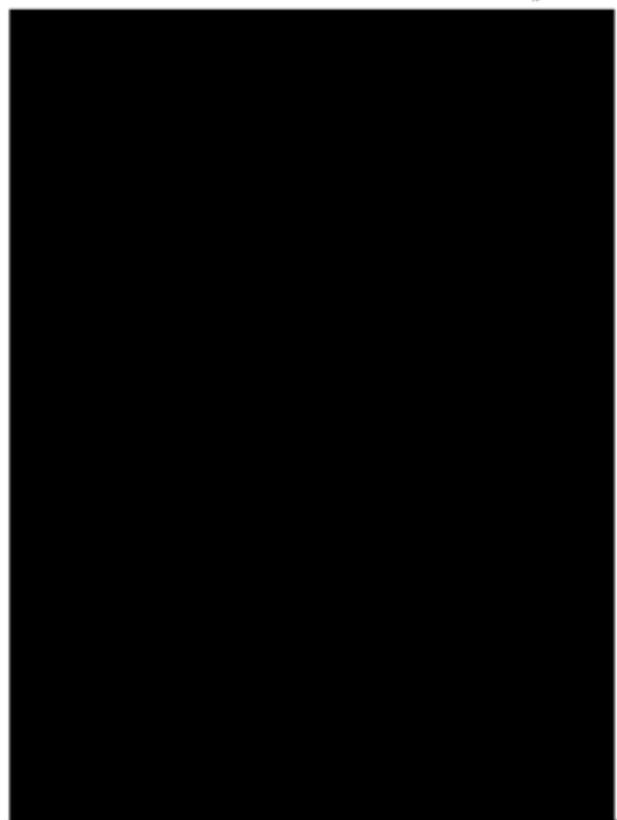
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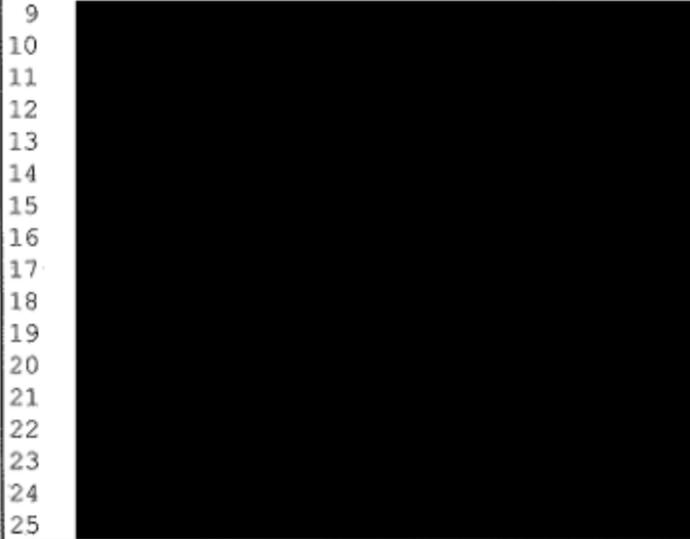
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1 recall a lot of stuff but I know I saw him after I had
 2 my son.
 3 Q. Well, you had your son [REDACTED]
 4 right?
 5 A. Yes. So, it could have been July, August,
 6 September, October, November, December. Then maybe it
 7 could have went on to '0, '06.
 8 Q. Well, do you know?
 9 A. I'm not positive but I know that I went there
 10 after I was pregnant.
 11 Q. That's all you --
 12 A. That's all I can tell you.
 13 Q. All right.
 14 A. And he didn't want me because he doesn't like
 15 women that had a kid regardless of what their age is.
 16 So, I had to bring another girl.
 17 Q. And that was upsetting to you?
 18 A. No.
 19 Q. You thought you were his favorite girl at
 20 one point?
 21 A. No.
 22 Q. That's what you told us in the last depo,
 23 didn't you?
 24 A. I told I was his favorite girl?
 25 Q. That you thought you were special and you

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1 were his favorite girl?
 2 A. He made me feel special. He made me feel like
 3 I was his favorite girl.
 4 Q. And it upset you when you found out there
 5 were other people going?
 6 A. Did it upset me?
 7 Q. Yeah.
 8 A. No.



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Q. You said you made two grand on a night,
 right?
 A. Okay. Great. Well, that goes to my son.
 MR. EDWARDS: Object to form,
 argumentative.
 BY MR. LUTTIER:
 Q. You would go and sell your wares, your
 shoes.
 A. So, what all the money I owe, or all the money
 that I earn, goes to my son.
 Q. And you didn't even pay --
 A. Not to suits.
 Q. You didn't even --
 A. Not to 'ceipts.
 Q. You didn't even --
 A. Not to paper.
 Q. And you didn't even pay taxes on money you
 earned, did you?
 MR. EDWARDS: Object to the form.
 THE WITNESS: I did pay taxes.
 BY MR. LUTTIER:
 Q. Did you pay taxes in '08?

1 A. Yes, I did.
 2 Q. And did you pay on the amount of income
 3 you actually earned?
 4 MR. EDWARDS: Object to the form.
 5 THE WITNESS: It's none of your damn
 6 business.
 7 BY MR. LUTTIER:
 8 Q. Do you know that filing a false tax return
 9 is a crime?
 10 A. Yeah, and it wasn't false. Kiss my ass.
 11 Q. So your tax return is in '08 is
 12 correct; is that right? Is that what you are
 13 telling us?
 14 A. No.
 15 Q. Is it false?
 16 MR. EDWARDS: Just read.
 17 BY MR. LUTTIER:
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 Q. Well, ma'am --
 23 A. Can you tell I am suffering? I hate Jeffrey
 24 Epstein, and I hope he burns in hell.
 25 On advice of counsel, I am invoking my

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 Fifth Amendment rights under the United States
 2 Constitution.
 3 Q. To anything in particular or just making
 4 that statement?
 5 A. To the question you asked me about my taxes.
 6 Q. That question has already been answered.
 7 A. Oh, okay. Next.
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
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[REDACTED]

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[REDACTED]

A. Yes.
Q. Who did that?
A. My friend [REDACTED]
Q. [REDACTED] who?
A. I don't know his last name.
Q. Where did you meet him?
A. I don't know.

[REDACTED]

Q. Is he somebody you dated?
A. No.
Q. Is he someone with whom you had some kind of relationship?
A. Yeah.
Q. What kind of relationship did you have with him?

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[REDACTED]

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A. Our sons would play together.
Q. Do they still play together?
A. No.
Q. Was he a client of yours?
A. No.

[REDACTED]

Q. Well, I'm old. Now, what invasion -- what do you mean when you say you've suffered invasion of your privacy?
A. Are you serious? Well, here is one. Here is two.
Q. So, you're talking about things that you did --
A. Investigators.
Q. -- in the public?
A. All my damn, all these years that I've, after Jeffrey they wanted -- invasion of my privacy, are you kidding me? I can't go anywhere without anyone knowing where I'm going. The FBI, the investigators following me everywhere. I can't take my son out with anybody knowing me.
Invasion of my privacy? Everybody knows

1 that Jeffrey Epstein molested me. So, if my son
 2 wants to go out and play with somebody, oh, no,
 3 she's the little girl that was in prostitution for
 4 Jeffrey Epstein, so we don't want her playing with
 5 our son.
 6 Q. So, or do they say she's the lady that
 7 runs her own escort service, we don't want her
 8 playing with our son?
 9 A. No one knows about that shit except you guys.
 10 Q. How about when you were working for
 11 another escort service?
 12 A. How about what?
 13 Q. You don't think anybody knew about that?
 14 A. No.
 15 Q. How about when you were --
 16 A. I am very discrete what I do. I don't put my
 17 name in the newspaper like Jeffrey Epstein saying that I
 18 am a prostitute or a slave for Jeffrey Epstein.
 19 Q. How about when you were top, dancing
 20 topless at bars? Do you think maybe people said --
 21 A. I did that out of, like not locally.
 22 Q. So, maybe, well, I mean --
 23 A. Well --
 24 Q. You wouldn't exactly call [REDACTED] --
 25 A. [REDACTED] I

1 all out. Everybody knows. Okay. You can sit there and
 2 act like you, you can act like an attorney and --
 3 Q. Has the words --
 4 A. -- say where has your name been? My name is
 5 out there everywhere. Okay. I am the prostitute of
 6 Jeffrey Epstein. I have brought young underaged girls
 7 there. I am so horrible.
 8 My son can't play with certain kids
 9 because of Jeffrey Epstein now. He has ruined my
 10 fucking life. He has brought me into this industry
 11 that this is all I know. And now I can't even, I
 12 can't even explain to you the hard things that I've
 13 been through my life because of Jeffrey Epstein,
 14 because he has taught me and many other girls how to
 15 pull money from older men.
 16 Q. Let's just be honest for the ladies and
 17 gentleman of the jury: He didn't force you to do
 18 anything?
 19 A. But he taught me from a young age --
 20 Q. Wait a minute. Let me finish.
 21 A. -- when I was 13 years old.
 22 Q. You --
 23 A. He taught me how to get money real quick.
 24 Q. Do you --
 25 A. -- from an old man. Don't sit here and tell

1 live in West Palm.
 2 Q. So, you meant within the immediate
 3 geographic area. And maybe they said, well, this is
 4 the lady that goes and sells her wares at all these
 5 topless bars; we don't want our children playing
 6 with her.
 7 A. No, not all. They see Jeffrey Epstein and my
 8 name all over the place and they say, you know what, I
 9 don't even want anything to with this girl because she
 10 was a prostitute for Jeffrey Epstein.
 11 Can I talk to him without you in his ear?
 12 Am I done talking?
 13 Q. Could you just tell me one place where
 14 your name has appeared anywhere as being someone who
 15 saw Jeffrey Epstein?
 16 A. It's everywhere.
 17 Q. Well, where? Just tell me one place.
 18 A. Where have you been?
 19 Q. Just tell me one place. Can you cite
 20 me --
 21 A. It's in the newspaper.
 22 Q. What newspaper ever ran your name?
 23 A. The initials of my name?
 24 Q. No, your name.
 25 A. It doesn't matter. The [REDACTED] means [REDACTED]. It's

1 me that I was not forced or anything like that.
 2 Q. That's exactly what I'm suggesting, ma'am.
 3 Do you believe that you owe, that you have a certain
 4 level of responsibility for your own conduct?
 5 A. Now I do.
 6 Q. You're [REDACTED] years old.
 7 A. When I was 13 years old, I didn't, I wasn't,
 8 no, I did not have that demeanor.
 9 Q. So, a [REDACTED] what you thought, because you
 10 want to clean up your imagine for your son, right?
 11 You want him to look up --
 12 A. Yes, I do.
 13 Q. So, as part of that process what you
 14 thought you would do a [REDACTED] is you would agree to
 15 hire out to strange men whom you don't know for
 16 between \$300 and \$500 for what you say is to go sit
 17 in rooms naked with them, and that's how you thought
 18 you would prove?
 19 A. Because that's all I know. I'm sorry.
 20 Q. And Jeffrey Epstein didn't make you do
 21 that, did he? You decided to do that, didn't you?
 22 A. You know what --
 23 Q. A whole new business that you decided to
 24 do on your own; is that right?
 25 MR. EDWARDS: Object to form.

1 THE WITNESS: -- before I --
 2 MR. EDWARDS: Argumentative, asked and
 3 answered.
 4 BY MR. LUTTIER:
 5 Q. Did Jeffrey Epstein ever give you the
 6 business advice on a business plan to go out --
 7 A. Yes, he did. He gave me business advice.
 8 Q. Wait. You started this in January?
 9 A. You know what he told me this: He said, you
 10 get me girls, this is business. Let's talk business,
 11 [REDACTED] You get me girls, I will pay you. Is that not
 12 called business?
 13 Q. So, and you quit doing that when?
 14 A. You get me girls, and I brought him two girls
 15 a day, one girl a day, \$200 each. That's not business?
 16 Q. And when you --
 17 A. He taught me business and now I run business.
 18 Q. And so --
 19 A. Just like you run business.
 20 Q. And when did that, when did you start --
 21 A. Just like you learned how to do this, I
 22 learned how to do this.
 23 Q. What -- so, you learned to be a
 24 prostitute?
 25 A. Yes, I did.

1 Tape 3.
 2 MR. EDWARDS: Before we get started I just
 3 want to put something on the record that there
 4 was a hearing, I believe it was November 3rd,
 5 2009, and the judge suggested that the defense
 6 only have one attorney there. And his
 7 recommendation was such because of the
 8 breakdown --
 9 MR. LUTTIER: Well, let's --
 10 MR. EDWARDS: -- in the first deposition.
 11 You can, you can make a record after. That is
 12 fine. Was because of the breakdown in the
 13 first deposition, and he thought that that type
 14 of intimidation by more than one attorney would
 15 lead to an additional meltdown.
 16 We have been fine thus far today despite
 17 there at a minimum always being two attorneys
 18 and in the last 15 to 20 minutes not only was
 19 Mark Luttier here and Bob Critton as it has
 20 been all day, but Jack Goldberger was also in
 21 the room.
 22 And once it was lined up three attorneys
 23 over there, either passing notes, talking in
 24 each other's ear, and otherwise assisting in
 25 the deposition or at least that was the feeling

1 Q. And you enjoy it?
 2 A. No, I don't enjoy it, and I can't wait to get
 3 the hell out of it.
 4 Q. And that's why in January of '010 you
 5 decided what you would do is start getting men to
 6 pay you \$300 to \$500 an hour to sit around naked
 7 with them, is that right?
 8 MR. EDWARDS: Form.
 9 THE WITNESS: Yes, that's right.
 10 BY MR. LUTTIER:
 11 Q. And the last time you took a girl to
 12 Jeffrey Epstein was when?
 13 THE WITNESS: Did we already ask this
 14 question?
 15 MR. LUTTIER: When? No, the last time --
 16 MR. EDWARDS: Object to the form.
 17 MR. LUTTIER: -- you said you went was --
 18 MR. CRITTON: You're out of time.
 19 MR. LUTTIER: Okay.
 20 THE VIDEOGRAPHER: Going off the record at
 21 3:14 p.m. This is the end of Tape 2.
 22 (A brief recess was held and
 23 Mr. Goldberger did not re-enter the room.)
 24 THE VIDEOGRAPHER: We're back on the
 25 record at 3:24 p.m. This is the start of

1 from the witness, we began to have another
 2 meltdown.
 3 So, hopefully we can proceed with less
 4 attorneys and we can get through this process.
 5 But I just wanted to put on the record exactly
 6 who was in the room when everything started to
 7 break down just now.
 8 MR. LUTTIER: Well --
 9 MR. EDWARDS: If you have something to
 10 say, that's fine.
 11 MR. LUTTIER: That just is not factually
 12 correct. Mr., first of all the judge ordered
 13 that Mr. Critton and I could be present
 14 throughout this deposition. Mr. Critton and I
 15 have been present throughout this deposition,
 16 and he and I have communicated throughout the
 17 deposition.
 18 Mr. Goldberger walked in here. I didn't
 19 put a stopwatch on how long he was there. He
 20 is not even here now. He was here for maybe
 21 ten minutes. I had no communication at all
 22 with him. He came. He sat here. He got up
 23 and he walked out.
 24 This breakdown that you're talking about
 25 occurred long before Mr. Goldberger ever got

1 here. So, I dispute --
 2 THE WITNESS: No.
 3 MR. LUTTIER: -- the facts, but it's sort
 4 of a moot issue now anyway, so --
 5 MR. EDWARDS: But if we're going to get
 6 into that, then every time he comes into the
 7 room do we need to now put it on the record
 8 that he is in the room?
 9 MR. LUTTIER: I have absolutely no
 10 problem --
 11 MR. EDWARDS: And each time --
 12 MR. LUTTIER: Anytime he comes in, we'll
 13 stop him and we'll let him know he can't come
 14 in here. Quite frankly, if you would have said
 15 something to me about it, I was examining the
 16 witness, I would have stopped right then and
 17 said, Jack, get out of the room.
 18 MR. EDWARDS: And I know in all fairness
 19 to what you just said I am not saying that to
 20 you was not factually accurate, what you just
 21 said, but you weren't able to see what was
 22 behind you, the passing of the cellphone and
 23 other things that the witnesses notices.
 24 I am just telling you that this impacts
 25 the deposition. So, I just want to make it

1 MR. EDWARDS: That's the --
 2 MR. LUTTIER: Defendant's unverified
 3 better answers to first interrogatories to
 4 Plaintiff. Later I'm going to come to the
 5 Plaintiff's supplemental better answers to
 6 Defendant's Interrogatory No. 19.
 7 MR. EDWARDS: Okay. But you said the date
 8 of service meaning you served on us?
 9 MR. LUTTIER: No, no. Your answers,
 10 better answers.
 11 MR. EDWARDS: Got it. I am looking at the
 12 same document you are.
 13 BY MR. LUTTIER:
 14 Q. All right. Ma'am, in response to some
 15 interrogatories you stated that from the end of 2007
 16 to November of 2008 you worked at [REDACTED]
 17 earning \$800 a week. So that would have been a
 18 period of approximately one year; is that right?
 19 MR. EDWARDS: Read.
 20 THE WITNESS: On advice of counsel I am
 21 invoking my Fifth Amendment rights again under
 22 the United States Constitution.
 23 BY MR. LUTTIER:
 24 Q. From, for the entire period of time that
 25 you worked at [REDACTED], what did you do for

1 clear so that you would know exactly what's
 2 happening and maybe we can get through this.
 3 You know, it's all of our goals to get through
 4 this day. So, I, I think the witnesses is
 5 ready if you're ready, Mr. Luttier.
 6 MR. LUTTIER: I'm ready.
 7 MR. EDWARDS: Okay.
 8 MR. CRITTON: What time did we start
 9 because we haven't -- we've been on the record,
 10 but we haven't asked a single question.
 11 THE VIDEOGRAPHER: It's 3:28 right now.
 12 Three and a half minutes.
 13 MR. CRITTON: Thank you.
 14 BY MR. LUTTIER:
 15 Q. I am now referring to your, your
 16 interrogatory answers. These are answers that you
 17 gave to written questions that were sent to you in
 18 this case. And they are entitled Defendant's
 19 unverified better answers to first interrogatories.
 20 I believe they may have been marked as Exhibit 1 to
 21 the first deposition, but there is only one set of
 22 them.
 23 MR. LUTTIER: And Brad, they are, the date
 24 of service on, I don't know, wait. Date of
 25 service is August 4th, 2009.

1 your money?
 2 A. On advice of counsel I'm invoking my Fifth
 3 Amendment rights under the United States Constitution.
 4 Q. In continuing in answering that particular
 5 interrogatory you said that in 2008 you worked at
 6 [REDACTED]. Where is [REDACTED]
 7 located?
 8 A. On advice of counsel I'm invoking my Fifth
 9 Amendment rights under the United States Constitution.
 10 Q. What did you do at [REDACTED]?
 11 A. On advice of counsel I'm invoking my Fifth
 12 Amendment rights under the United States Constitution.
 13 Q. Did you have any communication with
 14 Jeffrey Epstein after the phone call you made to him
 15 following the FBI's interview of you?
 16 A. I talked to [REDACTED]. Oh, my God. I don't know
 17 what I am going through. I'm like shaking.
 18 Q. I am talking about now a conversation with
 19 Mr. Epstein.
 20 MR. EDWARDS: The question was, did you
 21 talk to him after you called him --
 22 MR. LUTTIER: Right.
 23 MR. EDWARDS: -- after the FBI statement?
 24 MR. LUTTIER: Right.
 25

1 BY MR. LUTTIER:
 2 Q. And the date of your FBI statement for
 3 your information was April 24th, 2007. Did you have
 4 any conversation with Jeffrey Epstein after that
 5 date?
 6 A. After I, after I had called my attorney?
 7 Q. After April 24th, '07, which is the date
 8 that you gave a statement to the FBI.
 9 A. I talked to ██████████ (sic) or whatever her
 10 name is.
 11 Q. Did you have any conversation with Jeffrey
 12 Epstein?
 13 A. No. I don't think so, no.
 14 Q. Other than the witnesses you have listed
 15 in answer to Interrogatory No. 5, do you know of any
 16 other witnesses or do you intend to call any
 17 witnesses in the trial of this matter?
 18 A. What?
 19 MR. EDWARDS: Objection. Attorney-client
 20 privilege. I don't want her answering
 21 questions as to whether, as to information that
 22 she and I have spoken about in terms of what
 23 witnesses will be called at trial or our trial
 24 strategy.
 25

1 with Mr. ██████████ about being a witness? That is what
 2 would he be offering as testimony in the case?
 3 A. What would he be offering?
 4 Q. Yeah. Why did you ask him about being a
 5 witness?
 6 A. I didn't ask him about being a witness. I
 7 told him about what happened to me when I was 13 years
 8 old.
 9 Q. Okay.
 10 A. I'm not asking anybody to be a witness as of
 11 right now.
 12 Q. What is --
 13 A. I'm my own witness.
 14 MR. EDWARDS: Listen to his question.
 15 THE WITNESS: I am trying. I can't think
 16 right now.
 17 MR. EDWARDS: He wasn't asking you about
 18 being a witness.
 19 BY MR. LUTTIER:
 20 Q. Where does Mr. ██████████ live now?
 21 A. West Palm Beach.
 22 Q. Where in West Palm?
 23 A. ██████████
 24 Q. When did you last have communication with
 25 him?

1 BY MR. LUTTIER:
 2 Q. Have you spoken to anyone with respect to
 3 their willingness or your intention to call them as
 4 a witness to the trial of this matter?
 5 MR. EDWARDS: Not who I have spoken to.
 6 MR. LUTTIER: Yeah, you.
 7 THE WITNESS: What?
 8 BY MR. LUTTIER:
 9 Q. Have you spoken to anybody about being a
 10 witness in the trial of this matter?
 11 A. ██████████
 12 Q. Anyone else?
 13 A. Not that I know of.
 14 Q. And when did you speak with Mr. ██████████
 15 about being a witness?
 16 A. May '09.
 17 Q. And what is it you told him or asked him
 18 about being a witness?
 19 A. I told him that Jeffrey Epstein molested me
 20 since I was 13 years old.
 21 Q. Okay. And he wasn't around at the time
 22 that you alleged Mr. Epstein molested you, correct?
 23 A. He wasn't around at the time when Jeffrey
 24 Epstein was molesting me.
 25 Q. Okay. So, for what purpose did you confer

1 A. January 3rd, 2010.
 2 Q. And for what purpose did you have
 3 communication with him on that date?
 4 A. I had to give him some of his clothes.
 5 Q. When was the last time you were in
 6 communication with Mr. ██████████ that would be ██████████
 7 ██████████?
 8 A. He's my son's father. So, I talked to him two
 9 weeks ago.
 10 Q. And where was he when you talked to him?
 11 A. Fort Myers.
 12 Q. And do you know how he's employed now?
 13 A. No. He says he's not employed.
 14 Q. Have you discussed with him in the last
 15 year anything about this lawsuit?
 16 A. Yes.
 17 Q. What have you discussed with him?
 18 A. I told him I'm going through a lawsuit.
 19 Q. And what did he say?
 20 A. He said okay.
 21 Q. Have you asked him to be a witness?
 22 A. No.
 23 Q. Have you been in communication with any
 24 other members of Mr. ██████████ family in the last
 25 two years?

1 A. Yes.
 2 Q. Who?
 3 A. [REDACTED] (phonetic).
 4 Q. Who is [REDACTED]?
 5 A. His sister.
 6 Q. And where does she live?
 7 A. Wellington.
 8 Q. And for what purpose have you been in
 9 touch with her?
 10 A. She's my son's aunt.
 11 Q. And with what degree of frequency are you
 12 in communication with her?
 13 A. She asked me to attend her wedding via e-mail
 14 this March of '010.
 15 Q. Have you discussed with her anything about
 16 Mr. Epstein?
 17 A. No.
 18 Q. Does she to the best of your knowledge
 19 know anything about it?
 20 A. Yes.
 21 Q. Did you say no?
 22 A. Yes.
 23 Q. Does she know anything about?
 24 A. Yes.
 25 Q. What does she know about it?

1 A. That Jeffrey Epstein's a child molester.
 2 Q. And how did she get that information?
 3 A. From the news, from friends, from the
 4 neighborhood --
 5 Q. Did --
 6 A. From her brother.
 7 Q. -- has she asked you any questions about
 8 your relationship or interaction with Mr. Epstein?
 9 A. She said I am sorry that you're going through
 10 the trauma that you're going through.
 11 Q. Have you been in communication with any
 12 other member of Mr. [REDACTED] family?
 13 A. His mother.
 14 Q. And what's her name?
 15 A. [REDACTED]
 16 Q. And where is she located?
 17 A. Fort Myers.
 18 Q. And when did you last have communication
 19 with her?
 20 A. I don't know. A year ago.
 21 Q. And for what purpose did you have
 22 communication with her at that time?
 23 A. Dropping my son off with her.
 24 Q. In Fort Myers?
 25 A. [REDACTED]

1 Q. Is that the last time she's seen your son?
 2 A. Approximately, yeah.
 3 Q. Who was watching your son when you were
 4 down at [REDACTED] from 8:00 at night until 5
 5 in the morning?
 6 A. [REDACTED]
 7 Q. [REDACTED] who you
 8 identified earlier? [REDACTED] rather?
 9 A. Yeah.
 10 Q. And where was she watching him?
 11 A. At my house.
 12 Q. So, does she come spend the night at your
 13 house?
 14 A. Yes.
 15 Q. Did there, was there ever a time that you
 16 and [REDACTED] lived together?
 17 A. Yes.
 18 Q. When was that?
 19 A. When we were 13, 14.
 20 Q. Thirteen and 14. Was any adult living
 21 with you?
 22 A. My father.
 23 Q. Since you were 13 or 14 has [REDACTED] ever
 24 lived with you?
 25 A. No.

1 Q. Did you tell [REDACTED] why you needed
 2 to have her watch your son all night when you were
 3 down at [REDACTED]?
 4 A. I told her I need to work.
 5 Q. Do you tell her what you do for work?
 6 A. Yes.
 7 Q. What did you tell her?
 8 A. I sell lingerie and shoes and purses and Mary
 9 Kay.
 10 Q. Do you have any personal knowledge of the
 11 matters about which the witnesses listed in your
 12 answers to interrogatories that these witnesses
 13 have, have information about?
 14 MR. EDWARDS: Objection, attorney-client
 15 privilege. And we do this all the time.
 16 BY MR. LUTTIER:
 17 Q. This is just a list as prepared by your
 18 lawyer. You don't know what any one of these
 19 witnesses would say?
 20 MR. EDWARDS: And if she does, it's going
 21 to be information that I have talked to her
 22 about which you know is protected by
 23 attorney-client privilege and so do I.
 24 If you're asking her independent of her
 25 information I have told her, fine.

1 MR. LUTTIER: That's exactly what I am
 2 asking her.
 3 MR. EDWARDS: Okay. Let's ask it that way
 4 because it doesn't sound like that.
 5 BY MR. LUTTIER:
 6 Q. Do you know of any information that these
 7 witnesses have based on your communications with
 8 them?
 9 A. Excuse me?
 10 Q. Do you know any information that any of
 11 these witnesses have about this case based on your
 12 personal contact with them?
 13 A. What witnesses?
 14 Q. That are listed in the Answers to
 15 Interrogatory 5.
 16 MR. EDWARDS: Just answer his question,
 17 yes or no.
 18 THE WITNESS: No. I don't know these
 19 people.
 20 BY MR. LUTTIER:
 21 Q. On any visit that you went to see Jeffrey
 22 Epstein, did he ever ask you to do anything that you
 23 said you did not want to do?
 24 A. Yes.
 25 Q. What did he ask you to do that you said

1 all that you said I don't want to do this and Jeff
 2 said you had to do it anyway?
 3 A. Yeah. I told him that at times I did not want
 4 to bring girls, and he says, yes, I want you to do it
 5 anyway; you need to do it anyway.
 6 Q. And did you tell all the girls that you
 7 brought that Jeffrey would respect their wishes, and
 8 if they were uncomfortable doing anything, that they
 9 should just tell him that, and he wouldn't ask them
 10 to do anything that they weren't comfortable doing?
 11 A. Yes, because I was scared.
 12 Q. And that's, in fact, how he treated you,
 13 right?
 14 A. Yes.
 15 Q. You previously earned a degree as an
 16 esthetician; is that right?
 17 A. Yes.
 18 Q. And you now earned a degree since going to
 19 Mr. Epstein in massage therapy, correct?
 20 A. Yes.
 21 Q. And you earned both of those from the same
 22 school located on [REDACTED]?
 23 A. Yes.
 24 Q. And you could pursue a profession as an
 25 esthetician, a massage therapist if you so chose,

1 you didn't want to do?
 2 A. At one occasion he wanted to stick his fingers
 3 like all the way inside of me and I said no?
 4 Q. And what did he then do when you said no.
 5 A. He said okay. So then he just penetrated my
 6 vagina with his fingers.
 7 Q. What did he, did he -- when you said you
 8 didn't want him to do that, did he respect your
 9 wishes and not do it?
 10 A. No. Actually he, he pushed it. He tried to
 11 do it and he said, okay, no, it's going to be okay.
 12 It's going to be okay. And I backed off and I said no.
 13 Q. And then he stopped?
 14 A. Then he decided to respect my wishes.
 15 Q. Okay. Any other -- and this is on one
 16 occasion?
 17 A. Many occasions.
 18 Q. Well, on -- so on many occasions he would
 19 say he wanted to penetrate your vagina. You would
 20 say you didn't want -- well, actually what you said
 21 was he wanted to penetrate your vagina deeply I
 22 think. And, and you said no and he respected your
 23 wishes and didn't do it?
 24 A. Correct.
 25 Q. Okay. Was there ever anything that, at

1 could you not?
 2 A. No, not as a massage therapist.
 3 Q. Why not?
 4 A. Because I've told you once before I need to
 5 take the nationals.
 6 Q. But no one has prevented you from taking
 7 test, right?
 8 A. I have to wait to take the test. It only
 9 happens twice a year.
 10 Q. And has -- did you pass the first
 11 opportunity you had?
 12 A. No.
 13 Q. Okay. So, when's, when's the test coming
 14 up?
 15 A. In a few months.
 16 Q. And are you going to take it?
 17 A. Yes.
 18 Q. And you could have been working as an
 19 esthetician ever since you went to Jeffrey
 20 Epstein's?
 21 A. And I did work as an esthetician.
 22 Q. No one has prevented you from doing that,
 23 correct?
 24 A. No.
 25 Q. You made the decision to drop out of

1 school before you ever met Jeffrey Epstein, did you
2 not?

3 A. I'm pretty sure I was going to school when I
4 was seeing Jeffrey Epstein.

5 Q. But, but you made the decision to drop out
6 based on other facts and circumstances that had
7 nothing to do with seeing Jeff Epstein; isn't that
8 correct?

9 A. Excuse me?

10 Q. You decided to drop out of school for your
11 own reasons particularly I think you said because
12 you got pregnant, didn't you?

13 A. No.

14 Q. Well, why did you decide to drop out of
15 school?

16 A. I was trying to find girls to bring to
17 Jeffrey's house.

18 Q. Well, didn't you tell us the last
19 deposition that you dropped out when you got
20 pregnant?

21 A. I was going to school when I was pregnant.

22 Q. Yeah. And then you dropped out, right?

23 A. I dropped out when I was four months pregnant.

24 Q. Why did you drop out of [redacted]
25 [redacted] and then go to [redacted]?

1 six. But then I did go back and I got my high school
2 diploma, and like you said I have two degrees.

3 Q. When did you get your, your GED?

4 A. Yes.

5 Q. When did you get that?

6 A. When I turned 18.

7 Q. And who did you get that from?

8 A. [redacted].

9 Q. So, you got a high school equivalency
10 diploma at the same time you would have gotten a
11 high school graduation certificate --

12 A. Correct.

13 Q. -- had you stayed in school?

14 A. Correct.

15 Q. And then you were free to pursue the same
16 pursuits as anybody else that had graduated from
17 high school whether that would be college or a trade
18 school or whatever you want to?

19 A. No, no. If I would have stayed in school, I
20 could have got some type of scholarship. I could have
21 had many opportunities in school to learn higher
22 education than just the GED.

23 Q. Well, when you got --

24 A. And I could have -- traveled and I could have
25 went to a college, a bigger college, a state college.

1 A. Because ever since I met Jeffrey I -- before
2 Jeffrey I made wonderful grades. And then ever since I
3 met Jeffrey my grades went down and I was failing, so I
4 had to go to a school to bring my grades back up.

5 Q. But you opted to drop out of the [redacted]
6 [redacted] before you graduated?

7 A. Yes. I was four months pregnant.

8 Q. And that's why you dropped out?

9 A. Well, I needed to make money to buy a house, a
10 trailer so I could have my baby.

11 Q. Because you were pregnant?

12 A. Yes.

13 Q. Had you not been pregnant, you would have
14 continued in school, correct?

15 A. I can't answer that question. I don't know.

16 Q. Well, the point is the direct reason why
17 you dropped out was you were pregnant?

18 A. And I was making so much money off of Jeffrey
19 that I didn't think school was so necessary at that
20 time.

21 Q. Did you consult with your parents or any
22 counselors about that?

23 A. I didn't tell my parents about Jeffrey.

24 Q. How much were you making at that time?

25 A. I was making \$200 pretty much a day or 400 or

1 Q. How do you know that?

2 A. It's common sense.

3 Q. Well, you don't know what your grades
4 would have been, right?

5 A. No, I don't know what my grades would have
6 been.

7 Q. And at --

8 A. Do you know what tomorrow is going to bring?

9 Q. At the time that you went into the [redacted]
10 [redacted] you were practically failing, weren't you?

11 A. Yeah, but [redacted] they help girls, young girls
12 bring up their grades so you can go back into high
13 school and accomplish making more, bettering your grades
14 so you can get a scholarship.

15 Q. Well, in fact you got a scholarship for
16 your massage therapy, didn't you?

17 A. No. How could I?

18 Q. Did you tell us in the last deposition
19 that you got some kind of scholarship for going
20 there?

21 A. I didn't get a scholarship for going. No.
22 I've never got a scholarship.

23 Q. Did they lend you money to go to school
24 there?

25 A. For massage therapy but not for esthetics.

1 Q. That's what I was talking about was
 2 massage therapy.
 3 A. That's not a scholarship.
 4 Q. Okay.
 5 A. That's a loan that I have to still payback.
 6 Q. Did you ever travel anyplace with Jeffrey
 7 Epstein?
 8 A. Nope.
 9 Q. Are you -- you're a person that uses the
 10 computer now, correct?
 11 A. Yep.
 12 Q. Did you ever communicate with Jeff Epstein
 13 on the computer?
 14 A. No, not that I recall.

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
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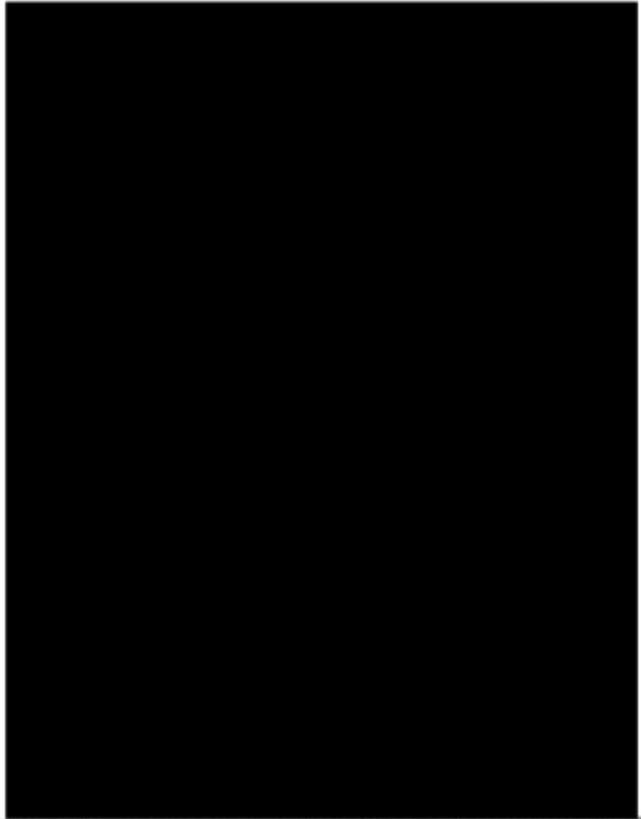
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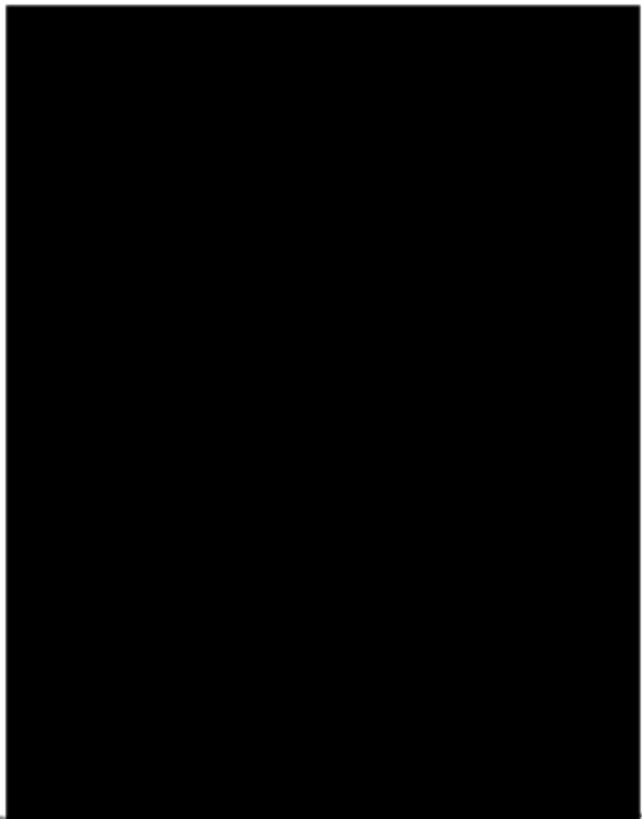
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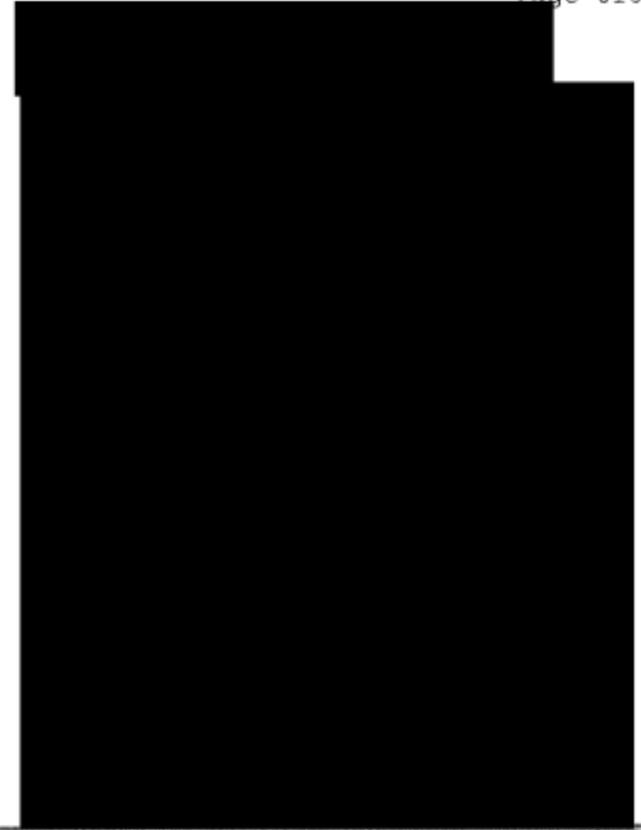
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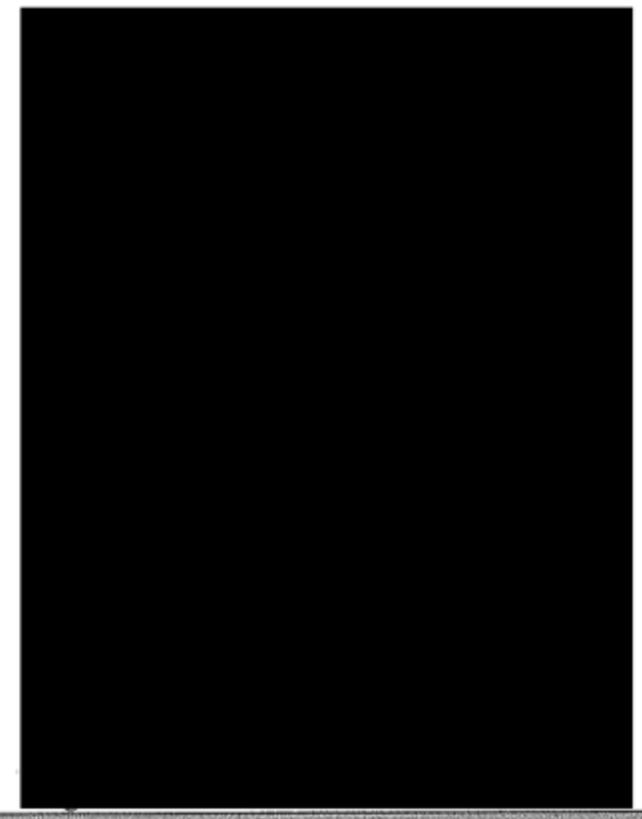
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BY MR. LUTTIER:
Q. Did you she ever approach you about that?
A. No.
Q. Did she ever tell the police she was concerned about that?
A. No.
MR. EDWARDS: Object to the form.
BY MR. LUTTIER:
[REDACTED]
MR. EDWARDS: Form, predicate.
MR. CRITTON: What's the form?
THE WITNESS: She was probably concerned.
MR. EDWARDS: You're asking --
MR. LUTTIER: Was your mother --
MR. EDWARDS: You're asking [REDACTED] to tell you whether she knows how her mother was feeling at some certain time.
BY MR. LUTTIER:
[REDACTED]
MR. EDWARDS: Same objection.
THE WITNESS: She probably was concerned, yeah.

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A. Yes.
Q. Do you know of [REDACTED] (phonetic)?
A. Yeah.
Q. Who is that?
A. It's actually my sister's son or daughter's father's cousin.
Q. Sister's daughter? Your sister has a daughter?
A. Yes.
Q. So, [REDACTED] daughter's cousin's father?
A. [REDACTED] baby's father, his cousin.
Q. Okay. When did you first meet [REDACTED]?
A. Probably knew him since I was 11.
[REDACTED]

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BY MR. LUTTIER:
[REDACTED]lly
MR. EDWARDS: Object to the form, predicate.
THE WITNESS: A mother's love. I don't know. I can't speak for my mother. I am sorry.
BY MR. LUTTIER:
Q. Were you doing something that gave her that concern?
MR. EDWARDS: Object to the form, speculation.
THE WITNESS: I don't know.
BY MR. LUTTIER:
Q. Are you aware of the fact that your father [REDACTED] July of '04?
A. He filed for what?
Q. What's called a [REDACTED], a

1 [REDACTED]
 2 [REDACTED]
 3 A. I never went to any program or anything.
 4 Q. Yeah, but do you know he filed a petition
 5 in the court claiming that you come home when you
 6 want to, you're in trouble with the police, and that
 7 [REDACTED] Did you
 8 know he filed that in July of '04?
 9 A. No.
 10 Q. You didn't know that?
 11 A. (Witness shakes head.)
 12 Q. Were you, in fact, taking [REDACTED]
 13 [REDACTED] in July of '04?
 14 A. Yes. I apologized to my father.
 15 Q. So, he had a legitimate concern at that
 16 time?
 17 MR. EDWARDS: Form.
 18 THE WITNESS: Yes.
 19 BY MR. LUTTIER:
 20 Q. And with what degree were you taking
 21 [REDACTED] at that time?
 22 A. I was a confused little girl with Jeffrey
 23 Epstein and that always, leaving Jeffrey Epstein's house
 24 always lead me to do more drugs and more drugs. I was
 25 uncomfortable about my body.

1 A. Concern?
 2 Q. Yeah. I mean were you afraid?
 3 A. Only for that one night that he was on coke.
 4 He was just trying to, like, get in my house and I
 5 didn't want him in there.
 6 Q. Do you know a lady by the name of
 7 [REDACTED]?
 8 A. Yeah.
 9 Q. How do you know [REDACTED]?
 10 A. Oh, my. I know her through [REDACTED]
 11 Q. Who is [REDACTED]?
 12 A. A friend of mine.
 13 Q. Where did you meet [REDACTED]?
 14 A. Through [REDACTED] boyfriend.
 15 Q. And who's [REDACTED] boyfriend?
 16 MR. EDWARDS: Did you have a question,
 17 Bob?
 18 MR. CRITTON: He was telling me to ask her
 19 what [REDACTED]'s --
 20 MR. EDWARDS: Oh, sorry --
 21 MR. LUTTIER: -- full name is. We'll get
 22 to that.
 23 MR. EDWARDS: Okay.
 24 THE WITNESS: I don't -- oh, God, I don't
 25 remember his name but they were both no good.

1 Q. What were you --
 2 A. I didn't like the way Jeffrey made me feel.
 3 Q. What were you uncomfortable about your
 4 body about?
 5 A. I felt insulted. I felt used.
 6 Q. Did you tell him that?
 7 A. No.
 8 Q. Did you tell anybody that?
 9 A. Yeah.
 10 Q. Who did you tell?
 11 A. [REDACTED]
 12 Q. On the, on the way over to Jeffrey
 13 Epstein's when you were taking her there?
 14 A. Yeah. We would tell each other that we didn't
 15 like the way we felt.
 16 Q. Did you file a complaint that your
 17 boyfriend [REDACTED] was stalking you?
 18 A. Yes.
 19 Q. Was he, in fact, stalking you?
 20 A. He got -- he was on coke one day, and I was
 21 scared because he was trying to get in the house and I
 22 didn't want nothing to do with him.
 23 Q. Did that give you some concern?
 24 A. Excuse me?
 25 Q. Did that give you concern?

1 They were like gang members.
 2 BY MR. LUTTIER:
 3 Q. That is [REDACTED]?
 4 A. No, [REDACTED] and her boyfriend.
 5 Q. Okay. But you don't remember the
 6 boyfriends's name? How did you -- what was your
 7 relationship with [REDACTED]?
 8 A. Associates. We talked once in a while.
 9 Q. When did you first meet her?
 10 A. In -- I don't know. Maybe when I was 14.
 11 Q. Did she live in your neighborhood?
 12 A. No.
 13 Q. How did you meet her?
 14 A. I'm not sure.
 15 Q. Was she a friend?
 16 A. She became an associate.
 17 Q. Is there a difference between an associate
 18 and a friend?
 19 A. Yeah. A friend is someone who's always by
 20 your side and who you can talk to daily, and an
 21 associate is just someone you can, that you know.
 22 Q. Did you socialize with her?
 23 A. Yeah.
 24 Q. What kinds of things did you do with her?
 25 A. Not good things.

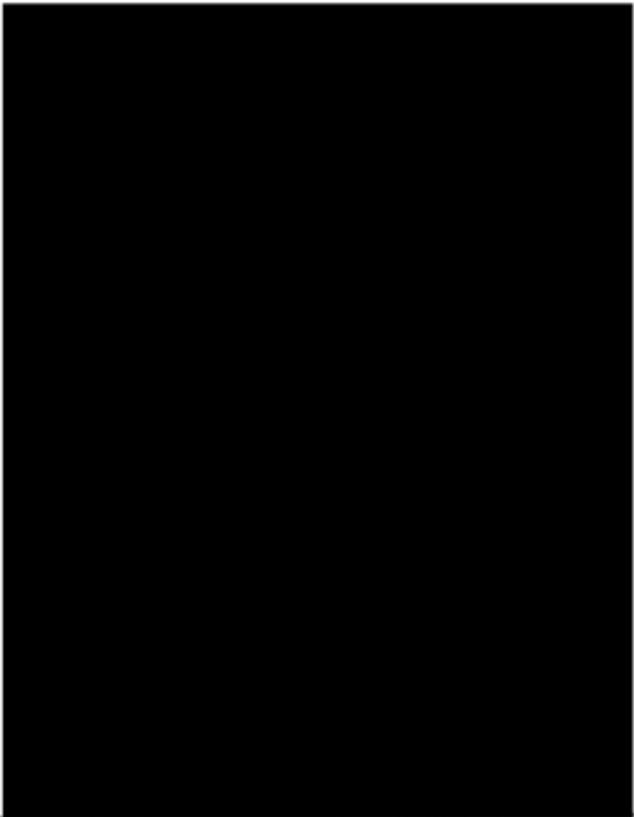
1 Q. What things?
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 Q. And this was during the time that you were
 12 seeing Mr. Epstein?
 13 A. Yeah.
 14 Q. What else did you and she do together?
 15 A. Nothing.
 16 Q. Did you-all live together at some point?
 17 A. I asked her to -- she asked me if she could
 18 room with me when I was living in my trailer and I gave
 19 her a chance. About a week later I found out that she
 20 was not the kind of friend for me at all and she was
 21 into no good things. And I have a son so I couldn't
 22 have her around.
 23 Q. What do you mean she was into no good
 24 things?
 25 A. She was into drugs and stealing and --

1 A. Yeah.
 2 Q. And she threatened to kill you?
 3 A. Yeah, she threatened a lot of stuff.
 4 Q. And did you believe she had the capacity
 5 to do that?
 6 A. No.
 7 Q. What gang was she in?
 8 A. [REDACTED] (phonetic).
 9 Q. And did you know her to be a violent
 10 person?
 11 A. Yeah. But she's like 80-pounds soaking wet so
 12 I'm not worried about her. She's just lost and God
 13 bless her soul.
 14 Q. Now, let's talk about Mr., is it [REDACTED] or
 15 [REDACTED] (phonetic)?
 16 A. [REDACTED]
 17 Q. Okay. And you have described earlier a
 18 confrontation that you had with him. And was his
 19 mother present for that confrontation?
 20 A. Yes.
 21 Q. And, and did it initially start out that
 22 Mr. [REDACTED] was physically abusive towards his
 23 mother?
 24 A. Yes. I had told him to leave and his mother
 25 came to pick up his daughter from my house. When she

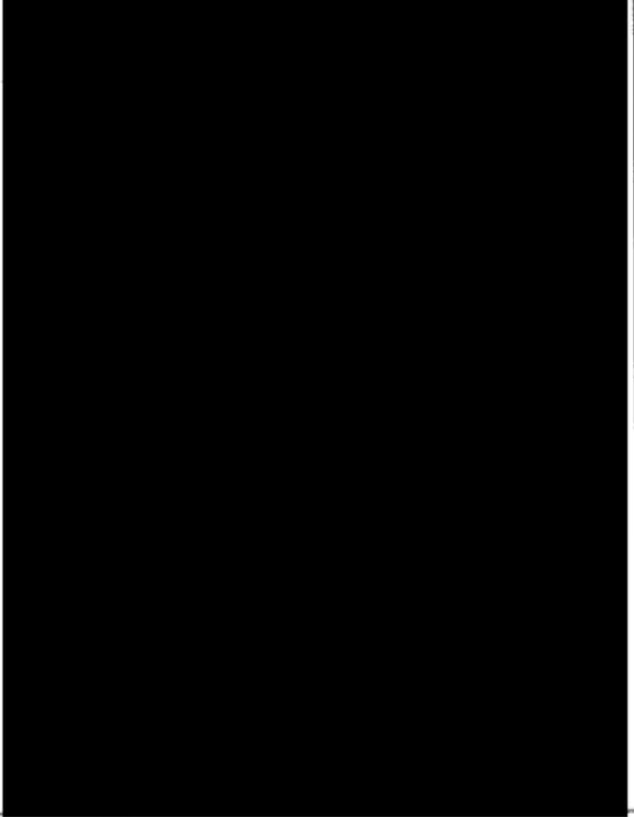
1 Q. Did you and she have a physical
 2 confrontation?
 3 A. She brought -- I told her when she moved in
 4 for that one week I told her do not bring anyone into
 5 this house. She brought a man into my house. I opened
 6 her bedroom door, found her giving him oral sex. I got
 7 angry. I said, please leave. She was on drugs.
 8 She got angrier and came into the bathroom
 9 and hit me or tried to hit me on my head. So, I
 10 pretty much held her down until the cops came.
 11 because I called the cops to get her out.
 12 Q. Was it an upsetting event to you?
 13 A. No. I just couldn't wait for her to get out.
 14 Q. Was that a common thing for you to have
 15 fistfights with other women?
 16 A. No. I didn't throw a fist. No, it was not a
 17 common thing.
 18 Q. And did she threaten you on the way out?
 19 A. Yes.
 20 Q. And you said she was in a gang?
 21 A. Yeah.
 22 Q. And what did she tell you on the way out?
 23 A. Oh, I don't remember. I'm going to regret it.
 24 Q. Well, did she say, I am going to get you,
 25 bitch?

1 arrived, he started pushing and shoving his mother into
 2 the car. I could tell that he was on drugs. So, I said
 3 this is uncalled, uncalled for. I called the cops and
 4 that was that. He ran. I guess you can say I have a
 5 good heart and I give the wrong people chances.
 6 Q. Well, that was one incident when, when the
 7 mother was present, right?
 8 A. Yes, and that night actually --
 9 Q. There was a second incident, was there
 10 not?
 11 A. Yes. That night he -- that's when he pushed
 12 me down a couple times and that's when I hit him and
 13 then he spit blood all over the house. And that's when
 14 D, DCF got involved. So, I, three days later,
 15 immediately moved out of the house and moved to [REDACTED]
 16 [REDACTED] And the next thing I know the week that I moved
 17 to [REDACTED] he showed up at my house.
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

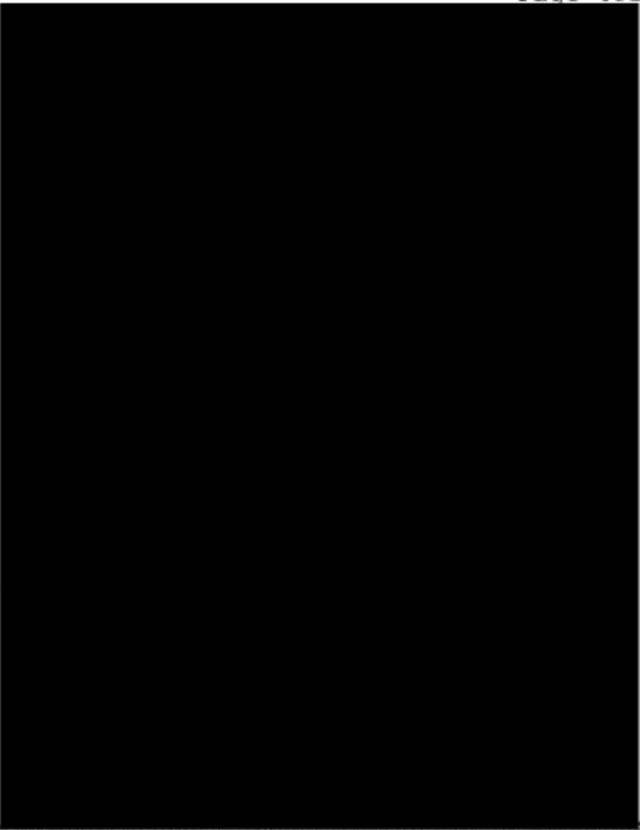
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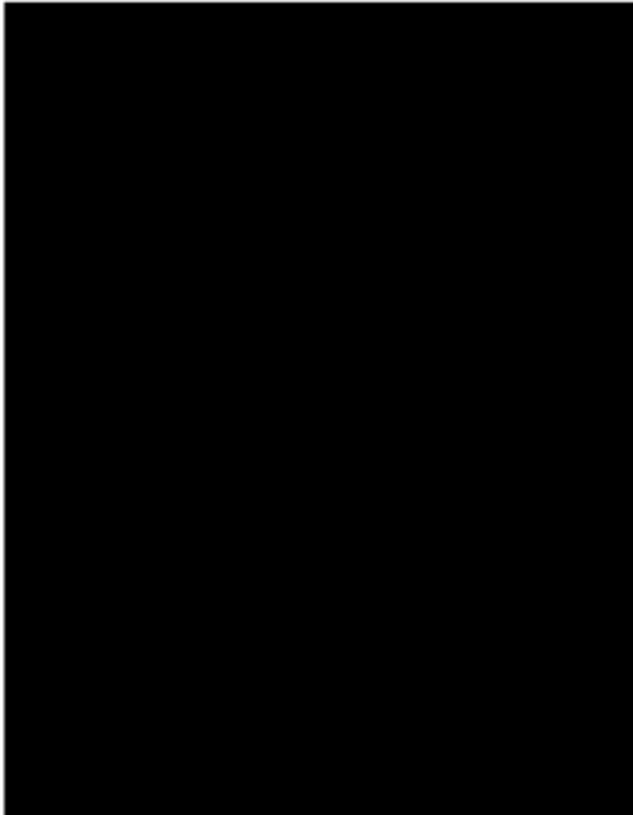


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1 A. Yes.
2 MR. LUTTIER: Let's mark this as our next,
3 whatever number we're on.
4 THE COURT REPORTER: Five.
5 MR. LUTTIER: Five.
6 (Defendant's Exhibit No. 5 was marked for
7 identification.)
8 BY MR. LUTTIER:
9 Q. Let me show you what is now marked as
10 Exhibit 5 and ask you if that's a copy of the



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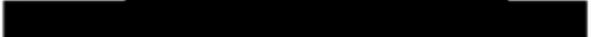
MR. LUTTIER: Let me mark that as 6, our next. And ask you if you can identify this document.

(Defendant's Exhibit No. 6 was marked for identification.)

THE WITNESS: I've had some crazy boyfriends, but for three years everything's been fine.

BY MR. LUTTIER:

Q. Let me show you what has been marked as Exhibit 6.

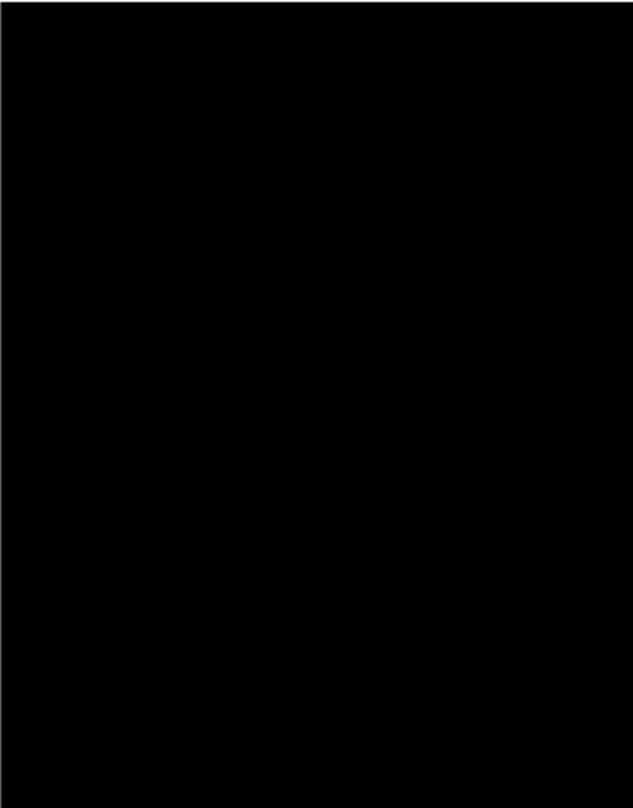


A. What about it?

MR. EDWARDS: He was just showing it to you.

THE WITNESS: Yes, I saw it before.

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BY MR. LUTTIER:



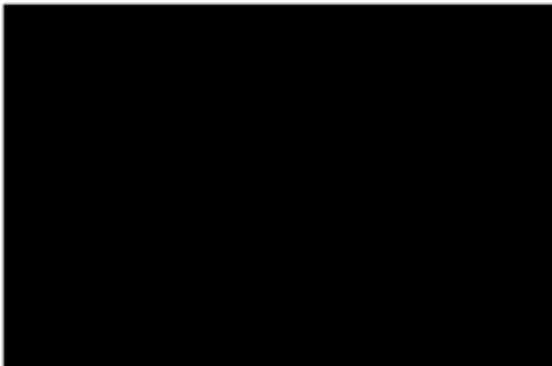
35 (Pages 635 to 638)

PROSE COURT REPORTING AGENCY, INC.

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MR. LUTTIER: I need to take a quick break.
THE VIDEOGRAPHER: Going off the record at 4:19 p.m.
(A brief recess was held.)
THE VIDEOGRAPHER: We're back on the record at 4:30 p.m.
BY MR. LUTTIER:
Q. Do you actually, yourself, call Mr. Epstein's home asking him if you could come work, did you not?
MR. EDWARDS: Object to the form, predicate, time-frame.

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A. No.
Q. Do you know if any of them have consulted with any lawyers about that other than your lawyers?
A. No. What they want to sue me along with Jeffrey?
Q. Have you ever discussed yourself with them their feelings about you having taken them to see Mr. Epstein?
A. Yeah.
Q. And what did they tell you?
A. [REDACTED] is very sensitive towards it. She didn't like it at all. She just was a poor little girl that I guess was influenced by me to go to Jeffrey's house.
Q. But I mean has she ever asked you why did you do that knowing what you knew or anything like that or said she holds you responsible?
A. In a way. I don't know the exact words but she's definitely came to me and said why would you even do that, why would we go there? You know, it, it hurts our self-esteem.
And in [REDACTED]'s aspect she was extremely scared to go the first time. And me being one of her best friends at the time, she just finally went after I begged her many times when I couldn't find

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BY MR. LUTTIER:
Q. During this period of time that you were going to see Mr. Epstein. Sometimes you called and asked his people at his house whether, you know, you could come work, did you not?
A. Yeah. Because he told me to call if I had a girl. So, I would call and ask is he available.
Q. Now, I want to ask you a couple questions about your two friends, [REDACTED] and again [REDACTED].
A. Excuse me.
Q. You took [REDACTED] to Mr. Epstein, did you not?
A. Yes, I did.
Q. How many times did you take her?
A. I don't know.
Q. Has [REDACTED] or [REDACTED] or anyone else that you took to Mr. Epstein discussed with you or anyone else that you know of the potential for them suing you?
A. Who suing me?
Q. Any girl that you took to Mr. Epstein.
A. No.
Q. Do you know if any of them talked to their lawyers about suing you as a result of you taking them to see Mr. Epstein?

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any other girl. And no, they both didn't like it. Who would like it?
Q. Did you have any friends better than [REDACTED]. You know, would you consider her, she was your best friend, or is your best friend?
A. At that time, no.
Q. Who is your best friend now?
A. [REDACTED].
Q. How about now?
A. My son.
Q. Okay. Other than your son, a friend not family. Is she, is she your best friend still?
A. Jesus, myself, my son. Why are you looking at me crazy?
Q. Is she your best friend was the question.
A. I don't have a best friend. Actually, yes, I do. [REDACTED].
Q. Who?
A. [REDACTED].
Q. Who is she?
A. [REDACTED].
Q. Is she another person that is suing Jeff Epstein?
A. Nope. She was affiliated with [REDACTED] who died.

1 Q. What, [REDACTED], [REDACTED]?
 2 A. Yeah.
 3 Q. How was she affiliated with [REDACTED]
 4 [REDACTED]?
 5 A. She was good friends with her and I met
 6 [REDACTED] through her. And I took [REDACTED]
 7 to Jeffrey Epstein's house.
 8 Q. Where does [REDACTED] live?
 9 A. Rhode Island.
 10 Q. Do you have the phone number for this
 11 babysitter you say you use?
 12 A. Yes.
 13 Q. [REDACTED]?
 14 A. Yes.
 15 Q. What's her number?
 16 A. I don't know it off the top of my head.
 17 Q. Is she listed in the phone book?
 18 A. Probably.
 19 Q. Is she -- you say she lives in the
 20 Acreage?
 21 A. Yes.
 22 Q. Is she married?
 23 A. No.
 24 Q. Have you ever been to her house?
 25 A. Yeah.

1 Q. Does she rent, does she own, do you know?
 2 A. No.
 3 Q. Live alone or with somebody else?
 4 A. Her brother.
 5 Q. Same last name --
 6 A. I don't know.
 7 Q. -- as her and her brother, last name is
 8 [REDACTED]?
 9 A. I don't know.
 10 THE VIDEOGRAPHER: Your mic is on your
 11 chair.
 12 BY MR. LUTTIER:
 13 Q. Now, you've told us when you believe you
 14 first went to Jeffrey Epstein and when you went the
 15 last time. If I -- and I may have asked you at the
 16 last deposition: You have no physical proof of when
 17 you actually went, right, the actual dates that you
 18 went?
 19 MR. EDWARDS: Object to the form.
 20 MR. LUTTIER: That would be like a
 21 calendar or notes, something like that.
 22 MR. EDWARDS: Form.
 23 THE WITNESS: Nope.
 24 BY MR. LUTTIER:
 25 Q. And you have no physical proof of how many

1 times you actually went?
 2 MR. EDWARDS: Form.
 3 THE WITNESS: What does that mean?
 4 MR. EDWARDS: Answer if you know what that
 5 means. Do you have physical proof, videotape.
 6 Answer his question if you know what the answer
 7 is.
 8 THE WITNESS: No. No one videotaped me
 9 and no, we didn't keep a log, no.
 10 BY MR. LUTTIER:
 11 Q. There is no record that you could consult
 12 that would say I know I went 21 times or exactly how
 13 many times because you kept a record of it?
 14 MR. EDWARDS: Form.
 15 THE WITNESS: No.
 16 MR. EDWARDS: This is outside of whatever
 17 records are in your client's possession.
 18 BY MR. LUTTIER:
 19 Q. And since you and [REDACTED] and [REDACTED] are
 20 all represented by the same lawyer, do you recognize
 21 that there is an inherent conflict among the three
 22 of you in terms of any accusations that [REDACTED] and
 23 [REDACTED] would have against you for taking them to
 24 Mr. Epstein?
 25 MR. EDWARDS: Object to the form.

1 THE WITNESS: I don't understand what the
 2 hell --
 3 BY MR. LUTTIER:
 4 Q. There is a conflict of interest.
 5 Mr. Edwards can't represent one, one client suing
 6 another one of his clients; you recognize that,
 7 don't you?
 8 MR. EDWARDS: Form.
 9 THE WITNESS: Okay.
 10 BY MR. LUTTIER:
 11 Q. Have you seen [REDACTED] deposition?
 12 A. No.
 13 Q. Have you been told anything about it?
 14 A. No.
 15 Q. Have you been told anything about [REDACTED]
 16 [REDACTED] case?
 17 A. No.
 18 Q. Who is actually representing you now? Do
 19 you know the name of the law firm that now
 20 represents you?
 21 A. Whatever this law firm's called.
 22 Q. Is it -- did you sign a new fee agreement
 23 with the new law firm?
 24 A. Yes.
 25 Q. So, it's whatever firm [REDACTED] is now

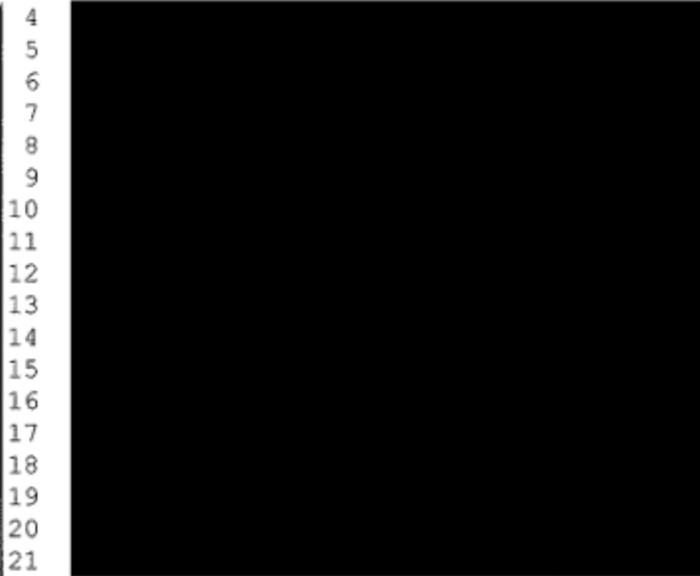
1 with?
 2 A. Yes.
 3 Q. And did you ever meet any of the people
 4 from the [REDACTED]?
 5 A. No.
 6 Q. Did you meet any investigators from the
 7 [REDACTED]?
 8 A. No.
 9 Q. Have you ever been interviewed by any of
 10 the investigators from there?
 11 A. No.
 12 Q. Do you know a man by the name of [REDACTED]
 13 [REDACTED]?
 14 A. No.
 15 Q. Have you ever heard of his name?
 16 A. Of [REDACTED]?
 17 Q. [REDACTED]
 18 A. No.
 19 Q. Do you have this babysitter's phone number
 20 in your cellphone?
 21 A. No. I don't keep it in my cellphone.
 22 Q. You, you don't keep your babysitters
 23 number in your cellphone?
 24 A. No.
 25 Q. And you don't have it memorized?

1 A. Okay. I have to pick my son up by 6 so --
 2 MR. EDWARDS: We'll be done.
 3 BY MR. LUTTIER:
 4 Q. At the beginning of this deposition you
 5 asked a question about whether or not somebody else
 6 was going to be here I think on behalf of you. And
 7 you made some reference to somebody you had met with
 8 about this deposition. Do you recall making that
 9 statement, asking whether or not this other person
 10 was going to be here?
 11 A. Uh-huh, yes.
 12 Q. Who were you referring to?
 13 A. His name is -- I don't know his name.
 14 Q. Is it a lawyer?
 15 A. He's an attorney.
 16 Q. Not a paralegal. A guy named Farmer,
 17 Mr. Farmer?
 18 A. I don't know.
 19 Q. Have you met this other person?
 20 A. Yes.
 21 Q. Where did you meet this other person?
 22 A. At the law firm.
 23 Q. Mr. Edward's law firm?
 24 A. Yes.
 25 Q. Down in Fort Lauderdale?

1 A. No.
 2 Q. So, what do you have to do when you want
 3 to call a babysitter?
 4 A. It's at home.
 5 Q. So, if you're out and about and you need
 6 to call the babysitter and tell her you'll be --
 7 A. I usually keep it in my purse.
 8 Q. -- there late you don't have any way to do
 9 that until you get home?
 10 A. I usually keep it in my purse and I am not
 11 late.
 12 Q. Where do you keep it? Do you have a phone
 13 book in your purse?
 14 A. No. I have a piece of paper with her number.
 15 Q. Okay. Do you have that with you here
 16 today?
 17 A. No.
 18 Q. So, as you sit here today you do not have
 19 on your person anywhere Ms. [REDACTED] phone number;
 20 is that right?
 21 A. I do not have her number with me, no.
 22 Q. Do you know somebody by the name of [REDACTED]
 23 [REDACTED] (phonetic)?
 24 A. No. What time is it?
 25 Q. 4:41.

1 A. Yes.
 2 Q. So, you've been down to his new law firm?
 3 A. Yes.
 4 Q. Did you review anything in preparation for
 5 today's deposition?
 6 A. Yesterday I talked to my attorney.
 7 Q. Did you review any documents?
 8 A. I reviewed a document, yes.
 9 Q. What document?
 10 A. I don't know. I don't know what document,
 11 sir. Sorry.
 12 Q. You say you reviewed a document or
 13 documents?
 14 A. I reviewed a document.
 15 Q. One piece of paper?
 16 A. A few, a few pieces of paper.
 17 Q. Okay. What were they? What did they have
 18 on them?
 19 MR. EDWARDS: Objection as to this line of
 20 questioning calls for attorney-client privilege
 21 information. She's not going to answer it as
 22 to exactly what we went over in preparation for
 23 the deposition.
 24 BY MR. LUTTIER:
 25 Q. Other than notes created by your lawyer

1 which I don't want to know about, did you review any
2 other documents in preparation for your deposition?
3 A. No. I have to be out of here at 5:30.



22 Q. Did you ever hear anything about how your
23 case may have been involved in any of that?
24 A. No. It's irrelevant to me right now.
25 Q. Does that mean you have never heard

1 in the garbage.
2 Q. Well, at the time we took your deposition
3 in September, you told us under oath that it was at
4 your home. Did you do something with it since --

5 A. No.
6 Q. -- your deposition on [redacted] ?
7 A. No.
8 Q. Well, it just didn't disappear, did it?
9 MR. EDWARDS: Form.
10 THE WITNESS: No. Are you being sarcastic
11 with me?

12 BY MR. LUTTIER:
13 Q. No. I mean you had to do something with
14 it, right?

15 MR. EDWARDS: Form.
16 THE WITNESS: I didn't touch it. I can't
17 find it. I don't know where it is. It's not
18 in the house, so, sorry.

19 BY MR. LUTTIER:
20 Q. Well, where did you think it was when you
21 testified definitively that it was in your home?
22 A. I thought it was in a couple of my papers that
23 I have and it's not. I thought it was where my Social
24 Security card was. It's not there, sir. End of
25 discussion.

1 anything or you just disregarded what you heard?
2 A. I disregarded what I heard.

3 Q. So, what did you hear?
4 MR. EDWARDS: You're asking her though
5 what she heard outside of any conversation with
6 me obviously?

7 MR. LUTTIER: Yeah, oh, yeah. I don't
8 want you to tell me, I don't want you to ever
9 tell me anything your lawyer told you.

10 THE WITNESS: Oh, no, I didn't hear
11 nothing.

12 BY MR. LUTTIER:

13 Q. Okay. Now, in your previous deposition
14 you indicated that you had a book. I think you said
15 it had a red -- it was a red book. I don't remember
16 if the color was right and you said it had a Bible
17 verse on it. Do you remember that testimony?

18 A. Yes.

19 Q. And at that deposition you told us
20 definitively that you had that at your home?

21 A. Yes.

22 Q. Where is that book now?

23 A. I can't find it. It's nowhere to be found.

24 Q. Well, what did you do with it?

25 A. I don't know. I moved a lot so it's probably

1 Q. Do you know the names of any of your
2 clients that you had when you were working -- other
3 than the ones you've already identified here,
4 clients you had when you were working for any of the
5 escort services?

6 A. No. Why would they want me to know their
7 names? I don't want to know their names either.

8 Q. I have no idea.

9 A. They have wives.

10 Q. All your clients have wives?

11 A. Probably. We don't -- it's not about
12 relationships, man. It's about --

13 Q. When you were working for those --

14 A. -- money and out.



18 MR. EDWARDS: Form.

19 MR. LUTTIER: Right?

20 MR. EDWARDS: Form.

21 BY MR. LUTTIER:



1 Q. Well, why did you do it?
2 A. That's all I know. It's what Jeffrey taught
3 me.

4 [REDACTED]
5 [REDACTED]
6 [REDACTED]

7 Q. Well, Jeffrey wasn't married, was he?
8 A. I don't know.
9 Q. Well, did you ever ask him?
10 A. He lied to me about everything.
11 Q. Did you ever ask him?
12 A. Yeah, I think I did.
13 Q. And what did he tell you?
14 A. He said no.
15 Q. Do you have any information that Jeffrey
16 Epstein is married?
17 A. No.
18 Q. Do you have any information that he was
19 ever married when you were --
20 A. No, and I don't care.

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

25 Q. And --

1 And you know I don't want to do this in the
2 future. I absolutely despise what I do. I
3 hate what I do. I don't want to do what I do.
4 This is what I have learned from Jeffrey
5 Epstein and I hate it, and I can't wait to get
6 out of it.

7 BY MR. LUTTIER:

8 Q. That's what you said in [REDACTED]
9 wasn't it?

10 A. Yeah.

11 Q. Didn't stop you, did it? You still went
12 ahead and you keep on doing the same thing you've
13 always done?

14 MR. EDWARDS: Form.

15 BY MR. LUTTIER:

16 Q. -- because you want the money, isn't that
17 right?

18 A. Yeah.

19 Q. That's the -- the bottom line is --

20 A. Well, actually I put myself through school
21 through it.

22 Q. The bottom line is --

23 A. I wanted to go back to school. Bottom line, I
24 wanted to go back to school so I did it to go to school.

25 Q. Well, have you saved up money to go to

1 A. It's wrong either way.

2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]

17 A. How do you justify you sitting here
18 representing a pedophile? You know? You're silly. But
19 I'm sorry.

20 MR. LUTTIER: Move to strike?

21 THE WITNESS: I don't know.

22 MR. LUTTIER: And now answer my question.

23 THE WITNESS: I have to go home every day
24 and put a poker face in front of my son. I
25 don't ever want him to know what I have done.

1 school?

2 A. Yes, I did.

3 Q. How much have you saved?

4 MR. EDWARDS: Form.

5 THE WITNESS: It's none of your business.

6 BY MR. LUTTIER:

7 Q. Where's the money?

8 A. None of your business.

9 MR. EDWARDS: Form.

10 BY MR. LUTTIER:

11 Q. Got it in a bank account?

12 MR. EDWARDS: Form.

13 THE WITNESS: It's none of your business.

14 BY MR. LUTTIER:

15 Q. Well, how are we going to test the
16 credibility of what you say when you say you saved
17 money unless we know where it is?

18 A. Who cares? Who gives a shit if you, if I save
19 money or not and if I -- you know, the money I saved,
20 who cares. You got money?

21 Q. Well, your justification as I understand
22 it for doing what you do is so that you can save
23 money to go to school, is that right?

24 A. Yeah, and so my son can go to Christian
25 school.

1 Q. So, I am asking you, did you save money
 2 and if so where is the money?
 3 MR. EDWARDS: Form.
 4 THE WITNESS: Yeah. I saved money and
 5 it's under my bed.
 6 MR. EDWARDS: Don't be sarcastic. Just
 7 give him an answer, the truth.
 8 THE WITNESS: No, I'm not. It's under my
 9 bed with rubber-bands.
 10 BY MR. LUTTIER:
 11 Q. All right. Well, how much have you saved
 12 then since it's under your bed?
 13 MR. EDWARDS: Object to the form.
 14 BY MR. LUTTIER:
 15 Q. How much have you saved?
 16 MR. EDWARDS: Form, asked and answered.
 17 Harassing at this point.
 18 BY MR. LUTTIER:
 19 Q. Do you have a record of it anywhere?
 20 A. Nope. I have headache.
 21 Q. Have you ever applied, applied for
 22 financial assistance at any college or university?
 23 A. Yes.
 24 Q. Where did you apply for assistance?
 25 A. Through the [REDACTED].

1 Q. And did you get any financial aide?
 2 A. Yep.
 3 Q. What?
 4 A. Yeah.
 5 Q. Was that the loan you described earlier?
 6 A. Yes.
 7 Q. So, you have been able to finance your
 8 education by simply applying for financial aide?
 9 A. Correct.
 10 Q. So, you didn't have to do what you're
 11 doing in order to go to college.
 12 A. I had to finance and then I had to make the
 13 money back to pay for it. I don't have a mommy and
 14 daddy that takes care of me and I am not going to be
 15 working at Burger King.
 16 Q. What's wrong with working at Burger King?
 17 A. You make \$7 an hour.
 18 Q. And that's really why you do what you want
 19 to do is you don't want to go get a job that pays
 20 less than the amount of money you can make doing
 21 what you do, isn't that right?
 22 A. No, you're wrong.
 23 MR. EDWARDS: Object to the form.
 24 BY MR. LUTTIER:
 25 Q. You could go work at Burger King, right?

1 A. I could.
 2 Q. How many jobs have you applied for?
 3 A. I used to work at [REDACTED] being an
 4 esthetician.
 5 Q. How many -- in the last two years, how
 6 many jobs have you applied for?
 7 A. I actually worked under the table for the [REDACTED]
 8 [REDACTED] sending out things for [REDACTED] I do side
 9 jobs. I do cleaning jobs. There is a lot of jobs I do
 10 to make money.
 11 Q. First of all, my question was how many
 12 jobs have you applied for in the last two years?
 13 A. In the last two years probably five, and I
 14 have got them all.
 15 Q. Okay. Where did you, where did you put in
 16 your applications for these five jobs?
 17 A. One for a [REDACTED]
 18 Q. What do you mean a [REDACTED]?
 19 A. [REDACTED]
 20 Q. Wait a minute. Is, is the [REDACTED]
 21 that you applied something different than
 22 [REDACTED]
 23 A. No. It's just [REDACTED]
 24 Q. So, the big company, [REDACTED], you
 25 submitted an application?

1 A. Yeah.
 2 Q. And did you get hired?
 3 A. Yep.
 4 Q. Okay. How much did they pay you?
 5 A. Fifteen bucks an hour.
 6 Q. So, you were able to get jobs in the labor
 7 market just like everybody else, right?
 8 A. Yeah.
 9 Q. Where else did you apply?
 10 A. I have applied [REDACTED].
 11 Q. Where?
 12 A. [REDACTED].
 13 Q. Okay. In the last two years?
 14 A. Yeah.
 15 Q. And did you get hired?
 16 A. Yep.
 17 Q. And how much did they pay you?
 18 A. Twelve an hour.
 19 Q. Okay. So, you can get that job. Are you
 20 still working for [REDACTED]
 21 A. No.
 22 Q. Why did you quit?
 23 A. It was seasonal.
 24 Q. Are you still forking for [REDACTED]
 25 [REDACTED]

1 A. Nope.
 2 Q. Why did you quit?
 3 A. The economy just went down and she only could
 4 hire me three days out of the week so --
 5 Q. Where else did you apply in the last two
 6 years?
 7 A. I always [REDACTED].
 8 Q. Well, that's not an application, is it?
 9 A. Well, you got to sign up to get [REDACTED].
 10 Q. That's just you selling stuff that you
 11 have [REDACTED]?
 12 A. Okay. Well, if that's how you want it.
 13 Q. Where else have you applied for a job?
 14 A. I've been at [REDACTED] and they paid me under the
 15 table.
 16 Q. When did you apply for a job at [REDACTED]?
 17 A. Last year.
 18 Q. What did you do for them?
 19 A. [REDACTED].
 20 Q. Okay. How much did you get paid?
 21 A. That was like \$9 an hour.
 22 Q. Okay. Where else did you apply?
 23 A. [REDACTED].
 24 Q. What did you do there?
 25 A. I was one of the instructors for [REDACTED].

1 A. Ten dollars an hour.
 2 Q. And when was the last time you did that?
 3 A. Like before I went to New York.
 4 Q. And whose houses, did you clean the same
 5 clients' houses?
 6 A. It's just actually friends' houses.
 7 Q. Anyplace else you've applied for work?
 8 A. No, that I can recall.
 9 Q. You said you worked for the [REDACTED]
 10 [REDACTED] Did I hear that?
 11 A. Well, that was for, that's incorporated with
 12 [REDACTED]
 13 Q. The [REDACTED] never
 14 employed you, did they?
 15 A. That is in -- intertwined with [REDACTED]
 16 Q. My -- listen to my question. The [REDACTED]
 17 [REDACTED] never employed you, did they?
 18 A. No. I didn't apply for the [REDACTED],
 19 so they couldn't deny me.
 20 Q. Well, you suggested they were paying you
 21 under the table. The [REDACTED]
 22 never paid you under the table.
 23 A. I never, I never worked for the [REDACTED]
 24 [REDACTED] sir. So keep on bring it up so we can keep on
 25 going over it again.

1 [REDACTED] group.
 2 Q. And, and how much did you get paid for
 3 that?
 4 A. Nine dollars an hour.
 5 Q. And are you still working there?
 6 A. No.
 7 Q. Why not?
 8 A. Because it's not paying the bills.
 9 Q. So, you quit?
 10 A. Yeah.
 11 Q. Did you quit [REDACTED]?
 12 A. No.
 13 Q. Did they fire you?
 14 A. No.
 15 Q. Still there?
 16 A. No.
 17 Q. What happened?
 18 A. They, they just needed help for a couple
 19 months.
 20 Q. Okay. Any other places you have applied
 21 for jobs?
 22 A. I clean houses --
 23 Q. For who?
 24 A. -- once in a while. For people.
 25 Q. How much do you get paid to clean a house?

1 THE WITNESS: What time is it?
 2 MR. EDWARDS: You got time. It's 5.
 3 BY MR. LUTTIER:
 4 [REDACTED]
 5 [REDACTED]
 6 A. Yep.
 7 Q. Is it current?
 8 A. I don't know. I don't use it.
 9 Q. Were you provided with a copy of a
 10 document that's called a proposal for settlement in
 11 this case?
 12 A. I don't know. Was I?
 13 Q. I mean I can show it to you. I don't want
 14 to mark it on the -- I don't want to have it in the
 15 record because I don't want it to be a -- but I will
 16 show it to you so you can recognize the document.
 17 Let me just show you the document.
 18 A. You can't help me.
 19 Q. Just go ahead and read it.
 20 A. Jeffrey Epstein is not admitting, he is in
 21 fact denying all liability or responsibility because he
 22 did it --
 23 THE COURT REPORTER: If you could read --
 24 MR. EDWARDS: Just read it to yourself
 25 because if you say the words, she has to take

1 them down.
 2 THE WITNESS: Oh, okay. I don't want to
 3 read anymore. I'm good.
 4 BY MR. LUTTIER:
 5 Q. Did you see that --
 6 A. Yeah.
 7 Q. Have you seen that before today?
 8 A. You know what, send Jeffrey to jail for 20
 9 years and then I will take zero dollars. I need
 10 justice. I want what's fair for all of us, for all of
 11 us girls.
 12 Q. What you want is money, right?
 13 A. No. I want justice and I want what's fair.
 14 And what's fair is that he should serve jail time. He
 15 didn't serve jail time for me and my girlfriends. He
 16 sat with his little rich butt --
 17 Q. And who told you that?
 18 A. -- in a little office doing community service
 19 which was probably nothing for him because money talks.
 20 And you know what, I want justice. So, I tell you what,
 21 give me no money right now and send Jeffrey to jail for
 22 20 years, and I will walk out of here with a smile from
 23 ear to ear.
 24 Q. Have you ever gone to jail, ma'am?
 25 A. Nope.

1 A. Yeah, I do have problems sleeping.
 2 Q. Do you -- well, other than the fact that
 3 you're out until 5:00 --
 4 A. Actually, [REDACTED].
 5 Q. Other, other than the fact that you're out
 6 until 5:00 in the morning at strip clubs, do you
 7 have any problem sleeping?
 8 A. Oh, you're so cute. I have trouble sleeping
 9 over Jeffrey, yeah.
 10 Q. Well, I mean, it doesn't keep you from
 11 going out to [REDACTED] until 5:00 in the
 12 morning, does it?
 13 A. It keeps me up.
 14 Q. Okay.
 15 A. People got to do what you got to do. Just
 16 like you got sit here and defend a child molester, you
 17 know. I got sit here and go to [REDACTED] and make
 18 money, too. What's the difference, right?
 19 Q. Now, you testified last time that you were
 20 [REDACTED]
 21 [REDACTED]
 22 A. Girls. I don't know.
 23 Q. What are their names?
 24 A. [REDACTED]. I don't know. They have stage
 25 names. I really could not tell you.

1 Q. You don't know how long Mr. Epstein was in
 2 jail, do you?
 3 A. I heard he was in jail for 18 months but --
 4 Q. You don't know what it was like in jail,
 5 do you?
 6 A. Oh, God. For Jeffrey, poor old Jeffrey, oh,
 7 he went to jail because he molested over 100 little
 8 girls. I hope he was molested or rapped, whatever the
 9 definition is. He needs more torture than that, jail.
 10 Yeah, he needs to stay in there for 20 years, not 18
 11 months.
 12 Q. What do you think you should do as a
 13 result of you having taken a bunch of your best
 14 friends and girlfriends and knowing exactly what was
 15 going to happen in taking them to Jeffrey Epstein?
 16 A. Call all of them and say, I am sorry, I was 13
 17 years old, I apologize for being naive and a stupid
 18 little girl and I hope that everybody can get
 19 counseling. And I hope that everybody can get served
 20 justice. I hope we can see Jeffrey's face in the
 21 newspaper saying that finally this jerk-off is in jail
 22 for 20 years, and now all of us can go to sleep
 23 peacefully.
 24 Q. You don't have any problem sleeping, do
 25 you?

1 Q. Well, did you guys work together?
 2 A. A few times.
 3 Q. And when you say you worked together, what
 4 does that mean?
 5 A. That we worked together.
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 MR. EDWARDS: Object to the form.
 21 THE WITNESS: No.
 22 BY MR. LUTTIER:
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

Electronically signed by cynthia hopkins [REDACTED]
 Electronically signed by cynthia hopkins [REDACTED]
 Electronically signed by cynthia hopkins [REDACTED]

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A. Sometimes. So, will Jeffrey go to jail for 20 years if he gives nobody money or he can't stand it?

Q. Have you sold any interest in this lawsuit to anybody?

A. No.

Q. In other words have you received money from anybody and in return given them an interest in this lawsuit?

A. No.

Q. Have you received any money or any other kind of consideration from any company with respect to this lawsuit?

A. No.

Q. Any attorney with respect to this lawsuit?

A. No.

Q. Any other person with respect to this lawsuit?

A. No.

Q. Have you been provided any money advances, that is money --

A. No.

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Q. -- as an advance against an outcome in return for a sharing of the percentage of it?

A. No.

Q. Have you assigned any interest in this lawsuit to anyone?

A. No.

MR. LUTTIER: Okay. I'm done. Any cross?

MR. EDWARDS: We'll read.

THE VIDEOGRAPHER: Going off the record at 5:05 p.m. This is the end of Tape 3 of the deposition.

THE COURT REPORTER: Do you want to order this?

MR. LUTTIER: Yes.

THE COURT REPORTER: Would you like a copy?

MR. EDWARDS: Yes, please.

(Witness excused.)

(Deposition was concluded.)

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CERTIFICATE OF OATH
THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, the undersigned authority, certify that [redacted] personally appeared before me and was duly sworn on the 9th day of February, 2010.

Dated this 19th day of February, 2010.

Cynthia J. Hopkins



Cynthia Hopkins, RPR, FPR
Notary Public - State of Florida
My Commission Expires: February 25, 2011
My Commission No.: DD 643788

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CERTIFICATE
THE STATE OF FLORIDA
COUNTY OF PALM BEACH

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

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

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

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

Dated this 19th day of February, 2010.

Cynthia J. Hopkins
Cynthia Hopkins, RPR, FPR

1 DATE: February 19th, 2010
 2 TO: [REDACTED]
 3 c/o BRAD J. EDWARDS, ESQUIRE
 4 FARMER, JAFFE, WEISSING, EDWARDS
 5 FISTOS & LEHRMAN, P.L.
 6 425 North Andrews Avenue
 7 Suite 2
 8 Fort Lauderdale, Florida 33301
 9 IN RE: [REDACTED] vs. Epstein
 10 CASE NO.: 302008CA028051XXXXMB AB
 11 Please take notice that on Tuesday, the 9th of
 12 February, 2010, you gave your deposition in the
 13 above-referred matter. At that time, you did not
 14 waive signature. It is now necessary that you sign
 15 your deposition.
 16 As previously agreed to, the transcript will be
 17 furnished to you through your counsel. Please read
 18 the following instructions carefully:
 19 At the end of the transcript you will find an
 20 errata sheet. As you read your deposition, any
 21 changes or corrections that you wish to make should
 22 be noted on the errata sheet, citing page and line
 23 number of said change. DO NOT write on the
 24 transcript itself. Once you have read the
 25 transcript and noted any changes, be sure to sign
 and date the errata sheet and return these pages to
 me.
 If you do not read and sign the deposition
 within a reasonable time, the original, which has
 already been forwarded to the ordering attorney, may
 be filed with the Clerk of the Court. If you wish
 to waive your signature, sign your name in the blank
 at the bottom of this letter and return it to us.
 Very truly yours,
 Cynthia Hopkins, RPR, FPR
 I do hereby waive my signature.
 [REDACTED]

1 ERRATA SHEET
 2 IN RE: [REDACTED] VS. EPSTEIN
 3 CR: Cynthia Hopkins, RPR, FPR
 4 DEPOSITION OF: [REDACTED]
 5 TAKEN: February 9, 2010
 6 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
 7 PAGE # LINE # CHANGE REASON
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 Please forward the original signed errata sheet to
 18 this office so that copies may be distributed to all
 19 parties.
 20 Under penalty of perjury, I declare that I have read
 21 my deposition and that it is true and correct
 22 subject to any changes in form or substance entered
 23 here.
 24 DATE: _____
 25 SIGNATURE OF DEPONENT: _____

1 CERTIFICATE
 2 ---
 3 THE STATE OF FLORIDA
 4 COUNTY OF PALM BEACH
 5 I hereby certify that I have read the foregoing
 6 deposition by me given, and that the statements
 7 contained herein are true and correct to the best of
 8 my knowledge and belief, with the exception of any
 9 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 _____
 20 [REDACTED]
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