

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND FOR
PALM BEACH COUNTY, FLORIDA

CASE NO. 50-2008-CA-028051 XXXX MB AB



Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.



VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN
TAKEN ON BEHALF OF THE PLAINTIFF

DATE: February 17, 2010



2

1 February 17, 2010
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 3 WITNESS DIRECT CROSS REDIRECT RECROSS
 4 JEFFREY EPSTEIN
 5 BY MR. EDWARDS 4
 6

EXHIBITS

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 8 1 Jane Doe number [REDACTED] versus Jeffrey
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1 The videotaped deposition of JEFFREY
 2 EPSTEIN in the above-entitled and numbered cause,
 3 was taken before me, TERRI BECKER, a Registered
 4 Professional Reporter and Notary Public for the
 5 State of Florida at Large, at 444 West Railroad
 6 Avenue, in the City of West Palm Beach, Palm
 7 Beach County, in the State of Florida, beginning
 8 at the hour of 11:15 o'clock a.m., pursuant to
 9 the Notice in said cause for the taking of said
 10 deposition which is annexed to the court file
 11 herein, on behalf of the PLAINTIFF in the
 12 above-entitled action pending in the above-named
 13 court.
 14 The appearances at said time and place
 15 were as follows:
 16 FARMER, JAFFE, WEISSING,
 EDWARDS, FISTOS & LEHRMAN, P.L.
 17 Attorneys for Plaintiff
 425 North Andrews Avenue, Suite 2
 18 Fort Lauderdale, Florida 33301
 Tel: [REDACTED]
 19 BY: BRADLEY J. EDWARDS
 STEVEN R. JAFFE, ESQ.
 20
 BURMAN, CRITTON, LUTTIER & COLEMAN
 21 Attorneys for Defendant
 303 Banyon Boulevard, Suite 400
 22 West Palm Beach, Florida 33401
 Tel: [REDACTED]
 23 BY: MICHAEL PIKE, ESQ.
 24 ALSO PRESENT:
 JOE ROVNER, Videographer
 25 (U.S. Legal Support)

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1 THEREUPON,
 2 JEFFREY EPSTEIN
 3 being by Terri Becker first duly sworn to tell
 4 the whole truth, as hereinafter certified,
 5 testified as follows:
 6 DIRECT EXAMINATION
 7 BY MR. EDWARDS:
 8 Q Can you give us your name.
 9 A Jeffrey Epstein.
 10 Q Mr. Epstein, you made a comment when you
 11 came in the room that you were appreciative of me
 12 being respectful to your housekeeper yesterday
 13 and I intend for that to be the same with you
 14 today.
 15 I want to start by asking you, at this
 16 point we've gone through a lot of discovery in
 17 this case. There aren't many disputed facts as
 18 to what actually happened at your house.
 19 Generally I think you would agree that you
 20 derived a way for young females to come to your
 21 house and engage in varying degrees of sexual
 22 activity, some of the girls as young as 12, some
 23 of them as old as seventeen or so, most in
 24 between, but as of yet you haven't provided an
 25 explanation.

5

1 I want to provide you an opportunity to
 2 tell the jury at this time why you did it.
 3 MR. PIKE: I'm going to object.
 4 Confusing, compound and irrelevant, as
 5 worded.
 6 A You know, I would like to answer that
 7 question, frankly. However, at this time, my
 8 attorneys have told me that I can't and I must
 9 invoke my Fifth, Sixth and Fourteenth Amendment
 10 rights or I risk losing their counsel.
 11 Accordingly, I therefore assert those rights.
 12 Sorry.
 13 MR. PIKE: In addition to that I'll move
 14 to strike counsel's statement as a
 15 narrative, as well.
 16 MR. EDWARDS: I understand. I wanted to
 17 provide him an opportunity, if today was
 18 going to be the day.
 19 MR. PIKE: Same thing, move to strike.
 20 Q Mr. Epstein, how long have you been
 21 sexually attractive to underage minor females?
 22 MR. PIKE: Objection, harassing,
 23 argumentative.
 24 A Are you kidding?
 25 Q No, I mean, I don't feel like I'm

6

1 **divulging any secrets here, right?**
2 MR. PIKE: Move to strike.
3 **Q That's the question that's pending.**
4 A I would like to answer that question as
5 well, as all your other questions today, however,
6 I have to follow my attorneys' advice. They have
7 told me I must invoke my Fifth, Sixth and
8 Fourteenth Amendment right to not answer those
9 questions today, or any questions relevant to
10 this lawsuit, so accordingly, I'm going to assert
11 those rights and -- under the constitution
12 guaranteed by the Fifth and Sixth, and Fourteenth
13 amendment.
14 **Q Would you consider yourself addicted to**
15 **sex with minor females?**
16 MR. PIKE: Same objections.
17 A You know, Mr. Edwards, again, I want to
18 be very respectful. As the current U.S. Attorney
19 has described your law firm as a criminal
20 enterprise and part of one of the largest frauds
21 in Florida's history, it has been reported that
22 your firm has fabricated multiple cases against
23 me in order to fleece unsuspecting investors out
24 of millions and millions of dollars, so
25 unfortunately at this time, although I would like

7

1 to answer that question, on advice of counsel I
2 will have to refrain and assert my Fifth, Sixth
3 and Fourteenth Amendment right.
4 **Q Can you then provide an explanation for**
5 **what relevance that soliloquy of yours has to,**
6 **whether or not you engaged in sex acts with**
7 **When she was a minor?**
8 MR. PIKE: Objection, no, he cannot.
9 Argumentative. Compound, harassing.
10 MR. EDWARDS: Mr. Pike, with all due
11 respect, it was not my idea for him to give
12 this speech about a former RRA law firm I
13 was asking to elaborate on that.
14 MR. PIKE: Counsel, I'm working with
15 your follow-up question.
16 MR. EDWARDS: I understand.
17 MR. PIKE: I'm objecting, object to the
18 form and stating the reasons on the record
19 why the form is required to be objected to,
20 based upon your question.
21 MR. EDWARDS: Will he elaborate on the
22 relevance of that soliloquy to his touching
23 when she was 13, 14 and 15 years old in
24 a sexual manner?
25 MR. PIKE: I'm going to object again,

8

1 argumentative, compound, harassing and
2 irrelevant.
3 **Q You can answer.**
4 A I would like to answer, however, I'm
5 going to have to assert my Fifth Amendment, Sixth
6 Amendment, Fourteenth Amendment right as advised
7 by my counsel, otherwise I risk losing their
8 advice.
9 **Q Mr. Epstein, have you ever been**
10 **diagnosed with a sex addiction to minors by a**
11 **psychologist or other medical professional?**
12 A I intend to respond to all of your
13 questions at some relevant time; however, today
14 at the present time, my attorneys have counseled
15 me that I cannot provide answers to any questions
16 relevant to this lawsuit and I must accept their
17 advice or risk losing my Sixth Amendment rights
18 to effective representation.
19 Accordingly, I assert my Fifth,
20 Federal -- Fifth and Sixth and Fourteenth
21 Amendment rights, to the United States
22 Constitution.
23 MR. PIKE: In addition to that, Mr.
24 Edwards, as the Court has ruled on several
25 matters, Mr. Epstein's medical history is

9

1 not relevant at this time nor has he placed
2 same at issue in this case.
3 MR. EDWARDS: Understood.
4 **Q Mr. Epstein, were you sexually abused as**
5 **a minor?**
6 A Again?
7 **Q Were you sexually abused, as a minor?**
8 A You know, again, I would like to respond
9 to all -- if any questions seem to be relevant.
10 I would like to respond to any relevant question
11 at this time; however, my attorneys have
12 counseled me that I cannot provide answers to the
13 questions relevant to this lawsuit today. I must
14 accept their advice or risk losing my Sixth
15 Amendment right to effective representation.
16 Accordingly then, I assert my Fifth, Sixth and
17 Fourteenth Amendment right to the United States
18 Constitution.
19 **Q Isn't it true that you have engaged in**
20 **some sexual interaction with hundreds of underage**
21 **minor females in the last ten years of your**
22 **life? Is that true?**
23 MR. PIKE: Objection, relevance.
24 A Mr. Edwards, the current U.S. Attorney
25 has described your law firm as a criminal

10

1 enterprise and part of the largest fraud in
2 Florida's history. It has been reported that
3 your firm fabricated multiple cases, many, many
4 multiple cases against me in order to fleece
5 unsuspecting investors out of millions and
6 millions of dollars. Unfortunately, at this time
7 in response to your question, my attorneys have
8 advised me that I must assert my Sixth Amendment,
9 Fifth Amendment, Fourteenth Amendment right.
10 Though, I believe, you know, that I would really
11 like to answer your questions today, but at this
12 moment I must assert those rights or risk having
13 my attorneys resign.

14 **Q You're invoking your Fifth Amendment**
15 **rights to each of these questions because you**
16 **know your answers will incriminate you and you**
17 **feel it will result in you being prosecuted for**
18 **your crimes; isn't that right?**

19 MR. PIKE: Objection, argumentative,
20 harassing. Calls for a legal conclusion.

21 **Q You can answer.**

22 A No, in fact, the Supreme Court recently
23 said the Fifth Amendment right is there to
24 protect the innocent, so, that's the way I would
25 like to answer that.

11

1 **Q Are you actually telling the jury that**
2 **you didn't commit the crimes that have been**
3 **alleged against you by the various females that**
4 **were under age when you engaged in sex with**
5 **them? Are you telling the jury that right now?**

6 MR. PIKE: Objection, argumentative,
7 harassing.

8 A I would like to respond to that
9 question, as you know, however, at the present
10 time my attorneys have counseled me that I cannot
11 provide answers to any questions relevant to this
12 lawsuit and I must accept their advice or risk
13 losing my Sixth Amendment right to effective
14 representation. Accordingly, I assert my Fifth,
15 Sixth and Fourteenth Amendment right under the
16 United States Constitution.

17 **Q Mr. Epstein, you understand that this is**
18 **the video that will be played to the jury in**
19 **██████'s trial against you and ██████ wants answers.**
20 **The jury is going to want answers, so I know that**
21 **you're telling us that you're going to respond at**
22 **some time in the future; but the time is now.**
23 **Would you like this opportunity to explain why**
24 **you engaged in sexual activity with ██████**
25 **beginning when she was 13 years old and you were**

12

1 **50 years old?**

2 MR. PIKE: I'm going to object once
3 again. We are getting way too argumentative
4 with the questioning. The questioning is
5 compound. It is speculative and it is also
6 harassing. Whether or not this deposition
7 video, thereof is played in front of a jury
8 is a question of fact, and it will be
9 determined by a judge pursuant to a motion
10 in limine, various portions thereof may or
11 may not be played, so having placed those
12 objections on the record I'm going to
13 instruct Mr. Epstein not to answer that
14 question.

15 MR. EDWARDS: Mr. Pike, I don't know if
16 you watched the 13 hours of harassing
17 questions to ██████ that she sometimes
18 invoked her Fifth Amendment rights, I
19 understand the adverse advice that would be
20 given and she was made to answer these
21 questions and these exact same questions
22 were asked of her, in fact, I'm using the
23 phraseology from Mr. Luttier. I'm not
24 trying to harass him.

25 **Q I'm simply asking him to explain to the**

13

1 **jury. If you're saying it didn't happen, if**
2 **you're saying it did happen, explain to the jury**
3 **why you did it. That's all I want to hear. I'm**
4 **being respectful about this.**

5 MR. PIKE: In an effort to keep a clean
6 record be respectful to the to the court
7 reporter rather than having a diatribe back
8 and forth between you and myself, I'll move
9 to strike your last statement as
10 irrelevant. Let's move on.

11 **Q Is it true, Mr. Epstein, you were born**
12 **January 20, 1953?**

13 A Yes.

14 **Q Where?**

15 A New York.

16 **Q Where in New York?**

17 A Brooklyn.

18 **Q Did you go to high school there?**

19 A Yes, sir.

20 **Q Where?**

21 A Lafayette High School.

22 **Q After high school did you attend**
23 **college?**

24 A Yes.

25 **Q Where was that?**

1 A New York.
 2 **Q What college did you attend?**
 3 A Cooper Union.
 4 **Q Sorry, I didn't hear.**
 5 A Cooper Union.
 6 **Q Did you get a degree from Cooper Union?**
 7 A No, sir.
 8 **Q How many years were you in college?**
 9 A I believe, two.
 10 **Q What did you study?**
 11 A Physics.
 12 **Q Why did you leave college early?**
 13 A I intend to respond to all relevant
 14 questions regarding this lawsuit, however, at the
 15 present time my attorneys have counseled me that
 16 I cannot provide answers to questions that may be
 17 relevant to this lawsuit, so accordingly I assert
 18 my constitutional rights as guaranteed by the
 19 Fifth, Sixth and Fourteenth Amendment.
 20 **Q Are you invoking your Fifth Amendment**
 21 **rights as to why you left college, is it safe**
 22 **then to presume that that answer you believe**
 23 **would incriminate you in some way?**
 24 MR. PIKE: I'm going to move to strike,
 25 speculative, argumentative, harassing.

1 Calls for a legal conclusion, and I know
 2 exactly what you're trying to do here, Mr.
 3 Edwards, is lace the record with questions
 4 that would ultimately give you an adverse
 5 inference at any potential trial of this
 6 matter, so having put that on the record,
 7 I'm going to instruct him not to answer that
 8 question, based upon his Fifth, Sixth and
 9 Fourteenth Amendment rights to the United
 10 States Constitution.
 11 MR. EDWARDS: With all due respect you
 12 cannot invoke his Fifth Amendment rights,
 13 your attorneys instructed me in that fact --
 14 MR. PIKE: He can.
 15 MR. EDWARDS: That [REDACTED]. Had to do it
 16 herself, so, I would like to hear it from
 17 Mr. Epstein.
 18 **Q Can we assume you're invoking your Fifth**
 19 **Amendment rights as to why you left college**
 20 **early, that that answer you feel would**
 21 **incriminate you?**
 22 MR. PIKE: Once again, move to strike
 23 for the same reasons.
 24 You can answer.
 25 A I've already answered the question.

1 I'll restate the answer. I would like to
 2 respond, intend to respond, and would like to
 3 respond to all questions today. However, counsel
 4 has advised me I must take the Fifth, Sixth and
 5 Fourteenth Amendment right under the U.S.
 6 Constitution.
 7 **Q After college where were you employed?**
 8 A You know, I would like to respond to all
 9 your questions today, however, on advice of
 10 counsel, I intend to take the Fifth, Sixth and
 11 Fourteenth Amendment rights provided by the
 12 United States Constitution or risk losing my
 13 counsel's representation.
 14 **Q Isn't it true that you were a teacher at**
 15 **the Dalton School in New York after college?**
 16 A Again, I would like to respond to all
 17 your questions; however, my attorneys have
 18 counseled me that I cannot provide answers to any
 19 questions today regarding to this lawsuit so I
 20 must accept their advice or risk losing my Sixth
 21 Amendment right to effective representation.
 22 Accordingly, I assert my Constitutional rights as
 23 guaranteed by the Fifth, Sixth and Fourteenth
 24 Amendment of the constitution.
 25 **Q Mr. Epstein, did you have sex with any**

1 **underage students while teaching at the Dalton**
 2 **School?**
 3 A Could you repeat that?
 4 **Q Yes. Did you have sex with any underage**
 5 **students while teaching at the Dalton School in**
 6 **New York?**
 7 A Mr. Edwards, your firm has been
 8 described by the U.S. Attorney as one of the
 9 largest -- as a criminal enterprise, perpetrating
 10 one of the largest frauds in Florida's history.
 11 It has been reported that your firm fabricated
 12 multiple cases against me and others in order to
 13 fleece unsuspecting investors out of millions and
 14 millions of dollars.
 15 Unfortunately at this time in response
 16 to your question, my attorneys have advised me I
 17 must assert my Fifth Amendment, Sixth Amendment
 18 and Fourteenth Amendment rights, though I believe
 19 you know I would like -- really like to answer
 20 your questions but at this time I must assert
 21 those rights or have my attorneys resign.
 22 MR. EDWARDS: Mr. Pike, I think you know
 23 he has a couple of options here. He can
 24 answer questions or he can invoke his Fifth
 25 Amendment rights. This nonresponsive

1 verbiage regarding the RRA law firm is not
2 one of the options, it's inappropriate in
3 the deposition and I would ask you to
4 instruct your client not to obstruct this
5 process any further. I am not going to
6 terminate the deposition. I want it to
7 finish, but obviously this is going to be
8 the subject matter of some motion in the
9 courts and you know the judges will not
10 appreciate this. I would like to just move
11 this process along by eliminating that
12 portion of his answer. I understand what he
13 is saying. I get it, but that's not
14 something responsive to any of the questions
15 and I think you know it is inappropriate.

16 MR. PIKE: I think the deponent is
17 answering the questions. If you believe the
18 responses are inappropriate and feel you can
19 take it up with the Court with the motion
20 you are speaking of, as you've done then you
21 can, as you've done several times before.

22 **Q After leaving the Dalton School, is it**
23 **true that you began working as a money manager at**
24 **Bear Stearns?**

25 A I intend to respond to all your

1 questions regarding this lawsuit at some relevant
2 time, however, at the present time my attorneys
3 have counseled me that I cannot provide answers
4 to any questions relevant to this lawsuit. Since
5 the U.S. Attorney has described your law firm as
6 a criminal enterprise, Mr. Edwards, and a part of
7 the largest fraud in Florida's history, I am
8 going to assert my Sixth Amendment, Fifth
9 Amendment and Fourteenth Amendment rights to the
10 U.S. Constitution.

11 **Q Isn't it true that while you were**
12 **working at Bear Stearns you were already engaging**
13 **in sex with underage minors?**

14 A Again, I believe you know the answers to
15 those questions, but --

16 **Q Yes.**

17 A May I finish?

18 **Q I do.**

19 MR. PIKE: Move to strike. Let the
20 witness --

21 **Q Sure --**

22 MR. PIKE: Let the witness answer your
23 question.

24 MR. EDWARDS: I would love for him to
25 finish the questions.

1 MR. PIKE: Mr. Edwards, as you know
2 there are serious Fifth, Sixth and
3 Fourteenth Amendment constitutional rights
4 at issue here, and the witness is attempting
5 to answer your questions to the best of his
6 ability, despite how laced they are with
7 adverse inference presumptions.

8 MR. EDWARDS: I don't want the adverse
9 inferences. I want the answers, that's it.
10 I don't want the adverse inferences.

11 MR. PIKE: Having said that, please
12 allow the witness to answer to answer the
13 question.

14 A Can you please repeat the question?

15 **Q Isn't it true while working at Bear**
16 **Stearns you were already engaging in sex with**
17 **underage minor females?**

18 A As your firm has been described by the
19 U.S. Attorney, as a criminal enterprise, using
20 some of the cases fabricated against me,
21 personally, I would like to answer that question
22 today; however, upon advice of counsel I must
23 assert my Fifth, Sixth and Fourteenth Amendment
24 rights under the U.S. Constitution or, in fact,
25 risk losing their representation.

1 **Q At some point in time while at Bear**
2 **Stearns you met and managed the money for a**
3 **fellow named Leslie Wexler, correct?**

4 A Again, I would like to answer all
5 questions relevant to this lawsuit, but today I
6 must assert my Fifth Amendment, Sixth Amendment
7 and Fourteenth Amendment right to the U.S.
8 Constitution.

9 **Q In fact, I read in another deposition of**
10 **yours that you do not consider yourself to be**
11 **homosexual, correct?**

12 A (No response.)

13 **Q You've answered that question before,**
14 **correct?**

15 A Correct.

16 **Q Do you consider yourself to be**
17 **bisexual?**

18 A No.

19 **Q In any event, you did develop a sexual**
20 **relationship with Leslie Wexler at some point in**
21 **time; is that true?**

22 A No.

23 **Q Did you have a business relationship**
24 **with Mr. Wexler?**

25 A I intend to respond to all relevant

1 questions. I would like to answer most of your
2 questions, Mr. Edwards, today, however,
3 especially since your firm has been described by
4 the United States Attorney in South Florida as a
5 criminal enterprise purported to -- purported to
6 have put -- pulled off the largest fraud in
7 Florida's history, I would like to answer it,
8 however, my attorneys here today counseled me I
9 must assert my Fifth, Sixth and Fourteenth
10 Amendment right under the U.S. Constitution,
11 therefore I'm going to do that.

12 **Q Are you saying because Rothstein,**
13 **Rosenfeld, Adler was determined to be a criminal**
14 **enterprise or somebody was running a criminal**
15 **enterprise out of that law firm, that is the**
16 **reason why you are not going to answer these**
17 **questions today? You linked that together in**
18 **that answer. I just want to make sure I'm**
19 **understanding that right?**

20 A I'm going to take the Fifth -- I intend
21 to respond to all relevant questions today. I
22 would like to respond; unfortunately my attorneys
23 have counseled me I can't, I must assert my
24 Fifth, Sixth and Fourteenth Amendment rights
25 under the U.S. Constitution.

1 **Q Because other law firms have asked very**
2 **similar questions and you haven't responded to**
3 **any of theirs either. I just want to understand**
4 **what the relationship between Rothstein,**
5 **Rosenfeld, Adler is to you invoking your Fifth**
6 **Amendment rights today, if you can articulate**
7 **that for me.**

8 MR. PIKE: Form, compound,
9 argumentative.

10 A Rothstein, Rosenfeld, Adler has been
11 described by the U.S. Attorney as a criminal
12 enterprise and as part of the largest fraud in
13 Florida's history. It has been reported that
14 your firm fabricated multiple cases using me, and
15 against me in order to fleece unsuspecting
16 investors out of millions of dollars.

17 **Q Another long time friend of yours is**
18 **Ghislaine Maxwell, right?**

19 A I intend to respond to all relevant
20 questions. I would like to answer most of these
21 questions today, but I can't because my attorneys
22 have counseled me that I cannot provide answers
23 to any questions relevant to this lawsuit. I
24 must accept their advice or risk losing my Sixth
25 Amendment right to effective representation.

1 Therefore I'll assert my Constitutional
2 rights under the Fifth, Sixth and Fourteenth
3 Amendment.

4 THE WITNESS: Excuse me, could we take a
5 break?

6 MR. EDWARDS: Already?

7 THE WITNESS: Restroom.

8 THE VIDEOGRAPHER: Going off the video
9 record 11:38 a.m.

10 THE WITNESS: Thank you.

11 (Pause in the proceedings.)

12 THE VIDEOGRAPHER: We're back on the
13 video record at 11:48 a.m.

14 **Q How did you meet Ghislaine Maxwell?**

15 A I intend to respond to all relevant
16 questions to this lawsuit; however, at the
17 present time my attorneys have counseled me that
18 I cannot provide answers to any questions
19 relevant to this lawsuit, and must accept this
20 advice or risk losing effective -- my right to
21 effective representation. Accordingly,
22 therefore, I assert my Fifth, Sixth and
23 Fourteenth Amendment rights to the U.S.
24 Constitution.

25 **Q You would agree, would you not, that**

1 **Ghislaine Maxwell shares your sexual obsession**
2 **for underage minor females?**

3 MR. PIKE: Argumentative, speculation,
4 harassing.

5 A You know, Mr. Edwards, the current U.S.
6 Attorney has described your law firm as a
7 criminal enterprise, and as taking part in one of
8 the largest frauds in Florida's history. It has
9 been widely reported that your firm fabricated
10 multiple cases of a sexual nature against
11 people -- other people and me, in order to fleece
12 unsuspecting investors out of millions of
13 dollars, so unfortunately at this time in
14 response to your questions, my attorneys have
15 advised me I must assert my Sixth Amendment,
16 Fifth Amendment and Fourteenth Amendment rights,
17 though I believe, as you know, I would really
18 like to answer these questions, but at this
19 moment, although at this time I have to assert
20 those rights or risk losing effective counsel.

21 **Q Do you know [REDACTED]**

22 A I intend to respond to all relevant
23 questions regarding this lawsuit; however, at the
24 present time my counsel has advised me that I
25 cannot provide answers to any questions relevant

1 to this lawsuit. Your firm has been described as
2 a criminal enterprise, and is part of the largest
3 fraud in Florida's history fabricating sexual
4 cases against me and others. Therefore,
5 unfortunately, although I would like to answer
6 all of your questions today, I'm going to have to
7 assert my Fifth, Sixth and Fourteenth Amendment
8 right.

9 **Q Did you and Ghislaine Maxwell sexually**
10 **assault [REDACTED] at [REDACTED]'s house?**

11 **A** I intend to respond to all relevant
12 questions regarding this lawsuit; however, at the
13 present time my attorneys have counseled me I
14 cannot provide answers to any questions relevant
15 to this lawsuit and must accept this right or
16 risk losing my Sixth Amendment rights to
17 effective presentation. Accordingly, I assert my
18 Constitutional rights as guaranteed by the Fifth,
19 Sixth and Fourteenth amendments to the U.S.
20 Constitution.

21 **Q Stating Ghislaine Maxwell and you had**
22 **devised several schemes to lure underage girls to**
23 **you for sex; isn't that correct?**

24 **MR. PIKE:** Form, argumentative,
25 harassing?

1 **A** Mr. Edwards, your firm has fabricated
2 multiple cases of sexual harassment claims and
3 other types of sexual cases against me and others
4 in order to be part of what the U.S. Attorney has
5 described as the largest fraud, the largest fraud
6 in Florida's history. I would like to answer all
7 your questions; however, my attorneys have
8 counseled me that at least today, I must assert
9 my Fifth, Sixth and Fourteenth Amendment rights
10 under the U.S. Constitution.

11 **Q Do you own a home in Manhattan?**

12 **A** I intend to respond to all relevant
13 questions to this lawsuit; however, at the
14 present time my attorneys have counseled me that
15 I cannot provide answers to any questions
16 relevant to this lawsuit, and I must accept their
17 advice or risk losing my Sixth Amendment right to
18 effective representation.

19 Accordingly, therefore, I have to assert
20 my Fifth, Sixth and Fourteenth Amendment right
21 under the U.S. Constitution.

22 **Q Do you own an island in the U.S. Virgin**
23 **Islands?**

24 **A** I intend to respond to all relevant
25 questions regarding this lawsuit; however, at the

1 present time my attorneys have counseled me that
2 I cannot provide answers to any questions
3 relevant to this lawsuit, no matter how much I
4 would like to.

5 Therefore, I must accept their advice or
6 risk losing my Sixth Amendment right to effective
7 representation; therefore, I have to assert my
8 Fifth, Sixth and Fourteenth Amendment right under
9 the U.S. Constitution.

10 **Q Do you own a home in New Mexico?**

11 **A** I intend to respond to all relevant
12 questions regarding this lawsuit and as I've had
13 to do with most of your questions here today, I'm
14 going to have to take my attorneys' advice and
15 assert my Fifth, Sixth and Fourteenth Amendment
16 right under the U.S. Constitution or risk losing
17 effective representation.

18 **Q Is it true that you have had underage**
19 **females, at each of those homes, for orgies with**
20 **you and Ghislaine Maxwell?**

21 **MR. PIKE:** Form, argumentative,
22 speculation and harassing.

23 **A** I would like to answer that question. I
24 really would. However, as your firm has been
25 described by the U.S. Attorney as a criminal

1 enterprise, which its principal purpose was
2 racketeering conspiracy to generate money for the
3 firm and its co-conspirators through the
4 operation of enterprise and through various
5 activities including mail fraud, wire fraud and
6 money laundering, and fabricating multiple sex
7 cases against me and others, though I would like
8 to answer your question today, Mr. Edwards, my
9 counsel has advised me I must take the Fifth,
10 Sixth and Fourteenth Amendment right provided by
11 the U.S. Constitution.

12 **Q Do you know somebody named [REDACTED]**
13 **(phonetic)?**

14 **MR. PIKE:** Can you spell that, for the
15 record?

16 **MR. EDWARDS:** No.

17 **MR. PIKE:** Or for the court reporter?

18 **A** No.

19 **Q You don't know the name?**

20 **A** No. Could you spell it?

21 **Q (Witness shrugs.)**

22 **A** Okay.

23 **Q Did your sexual obsession with underage**
24 **minor females grow at some point in time to allow**
25 **you access to these underage minors every single**

1 day for sex?

2 MR. PIKE: Overbroad. Speculation,
3 argumentative, compound, harassing and
4 confusing as well; as worded. Do you want
5 to break it down, Mr. Edwards?

6 **Q Isn't it true that for the past ten**
7 **years you have found a way to engage in sexual**
8 **conduct with underage minors on an every day**
9 **basis?**

10 MR. PIKE: Speculation. Argumentative.

11 A As your firm has been described as a
12 criminal enterprise by the United States Attorney
13 and is part of the scheme to defraud people in
14 South Florida of millions of dollars, you have
15 fabricated sexual cases and sexual claims against
16 people like me and others. Unfortunately at this
17 time although I would like to answer your
18 questions, Mr. Edwards, my counsel has advised me
19 I cannot. They have advised me I must assert my
20 Fifth, Sixth and Fourteenth Amendment rights
21 under the U.S. Constitution.

22 **Q Isn't it true that you have promised**
23 **underage minors money or other benefits to engage**
24 **in sexual conduct with you over the past ten**
25 **years?**

1 A Again, as I've answered many of your
2 questions today, and unfortunately will probably
3 end up not answering most of your questions
4 today, as your firm has been described, the firm
5 bringing this lawsuit, I believe, if I'm wrong
6 please, correct me --

7 **Q You're wrong.**

8 A This is the firm that didn't notice this
9 deposition?

10 **Q Did not?**

11 A Did not?

12 **Q No.**

13 A I apologize. Though your former firm
14 has been described, and the person you represent,
15 L.M., in this case was represented by the firm
16 that was described by the U.S. Attorney as
17 perpetrating one of the largest frauds in South
18 Florida's history, fabricating multiple sexual
19 cases against me and others in order to fleece
20 unsuspecting investors out of millions and
21 millions of dollars, so though unfortunately, I
22 would like to answer each one of your questions
23 today, my counsel has advised me I must assert my
24 Sixth Amendment, Fourteenth Amendment and Fifth
25 Amendment right, though I believe you know, I

1 would like to answer those questions, though at
2 this moment I must assert those rights or risk
3 losing my attorneys.

4 **Q Sure, let's test that answer.**

5 A Okay.

6 **Q Let's talk about Jane Doe [REDACTED] Jane Doe**

7 **[REDACTED], who was represented by [REDACTED]**
8 **[REDACTED] firm, had nothing to do with**

9 **Rothstein, Rosenfeld, Adler. Do you know [REDACTED]?**

10 A Who?

11 **Q [REDACTED]**

12 A Can you spell it?

13 **Q Common spelling, [REDACTED]**

14 **[REDACTED]**

15 A Can you spell it for me, please?

16 **Q [REDACTED]**

17 A What's the last name, how is it
18 spelled?

19 **Q [REDACTED] I believe.**

20 A I intend to respond to all relevant
21 questions regarding this lawsuit; however, at the
22 present time my attorneys have counseled me that
23 I cannot provide answers to any questions that
24 may be relevant to this lawsuit and I must accept
25 this advice or risk losing my Sixth Amendment

1 right to effective representation. Accordingly,
2 I assert my Constitutional rights as guaranteed
3 by the Fifth, Sixth and Fourteenth Amendment to
4 the Constitution.

5 **Q Just for the record, I can only spell it**
6 **the way it was spelled in your flight logs from**
7 **your airplane. I don't know exactly how she**
8 **spells her name, only how your pilot would spell**
9 **her name.**

10 MR. PIKE: Form, speculating.

11 **Q If I misspell it --**

12 MR. PIKE: Form, speculation,
13 argumentative, harassing.

14 MR. EDWARDS: That's harassing?

15 MR. PIKE: It assumes facts currently
16 not in evidence in this particular
17 deposition; therefore, I move to strike.

18 MR. EDWARDS: I was responding to his
19 question asking me how to spell her name. I
20 don't know how other than his own pilot.

21 MR. PIKE: Mr. Edwards, he asked you to
22 spell the name, you then spelled the name,
23 then went on with another narrative and
24 there wasn't a question posed, on the floor.

25 **Q You would agree you interacted with [REDACTED]**

1 every day in a sexual way, when she was 15 years
2 old, right?

3 A Again, I'm sorry?

4 Q Sure. You would agree that you
5 interacted with [REDACTED] sexually on an every day
6 basis when she was 15 years old?

7 A You know, again, Mr. Edwards, I would
8 like to answer all your questions here today. My
9 attorneys have asked me -- advised me that I must
10 assert my Sixth Amendment, Fourteenth Amendment
11 and Fifth Amendment rights provided by the U.S.
12 Constitution and the fact that the current U.S.
13 Attorney has described your law firm as a
14 criminal enterprise, is one of the largest frauds
15 in Florida's history for fabricating sexual --
16 cases of a sexual nature against me and others.
17 Unfortunately, although I would like to answer
18 those questions, if I do I risk losing my
19 attorneys' counsel. Therefore, I must assert my
20 right.

21 MR. EDWARDS: Madam court reporter, I'll
22 attach as an exhibit, the Jane Doe number
23 [REDACTED] versus Jeffrey Epstein complaint, at
24 some point in time. It will be Exhibit 1,
25 as I'm going to go through some of the facts

1 as alleged in the complaint and as will be
2 testified to by the plaintiff.

3 (Jane Doe number [REDACTED] versus Jeffrey
4 Epstein complaint was deemed marked as
5 Exhibit number 1 for identification, as of
6 this date.)

7 MR. PIKE: Counsel, do you have an extra
8 copy of that for me?

9 MR. EDWARDS: No.

10 MR. PIKE: May I look at it real quick?

11 MR. EDWARDS: No. It has my notes on
12 it.

13 MR. PIKE: I understood, I saw the
14 highlights.

15 MR. EDWARDS: The notes are highlighted
16 so when we copy it, it will not show up.

17 MR. PIKE: Just for the record, that's a
18 current, operative pleading, correct?

19 MR. EDWARDS: Correct.

20 THE WITNESS: What does that mean?

21 MR. PIKE: There may have been some
22 amendments to a complaint and I want to make
23 sure that's the operative complaint at issue
24 that he is speaking of today.

25 THE WITNESS: Can I go off the record

1 for a second?

2 May I ask you a question?

3 MR. PIKE: Sure. Can we take a break
4 for a second?

5 MR. EDWARDS: Again?

6 THE WITNESS: Just a question.

7 MR. PIKE: He wants to speak with me for
8 a second.

9 THE VIDEOGRAPHER: Off the video record
10 12:01 p.m.

11 (Pause in the proceedings.)

12 THE VIDEOGRAPHER: We are back on the
13 video record at 12:02 p.m.

14 Q Is it true, Mr. Epstein, that you and
15 Ghislaine Maxwell forced [REDACTED] to have sex with
16 you on a daily basis?

17 MR. PIKE: Form, argumentative,
18 harassing.

19 A Unfortunately at this time, though I
20 would really like to answer those questions, and
21 like I have done for most of your questions here
22 today, Mr. Edwards, your firm was described as a
23 criminal enterprise, a serious criminal
24 enterprise by the current U.S. Attorney. Part of
25 that criminal enterprise was fabricating cases of

1 a sexual nature against me and others in order to
2 fleece unsuspecting investors out of millions of
3 dollars. Though, unfortunately at this time no
4 matter how I would like to respond to your
5 questions, I must assert my Sixth Amendment,
6 Fifth Amendment and Fourteenth Amendment rights
7 under the U.S. Constitution or risk having my
8 attorneys resign.

9 Q Isn't it true that [REDACTED] was yours and
10 Ghislaine Maxwell's sex slave from the time she
11 was 15 through the time she escaped when she was
12 19?

13 MR. PIKE: Again objection,
14 argumentative, harassing.

15 A Mr. Edwards, your firm has been
16 described as -- excuse me, as a criminal
17 enterprise by the current U.S. Attorney and part
18 of the largest fraud in Florida's history. Part
19 of that fraud was fabricating multiple cases
20 against people like me and others, of a sexual
21 nature, in order to fleece unsuspecting investors
22 out of millions and millions of dollars, so
23 though I would like to answer that question, my
24 attorneys have told me today I must assert my
25 Sixth Amendment, Fourteenth Amendment and Fifth

1 Amendment right.

2 **Q Isn't it true that you and Ghislaine**
3 **Maxwell celebrated her 16th birthday with her and**
4 **had sex with her on that day?**

5 MR. PIKE: Form. Compound, confusing,
6 argumentative, harassing.

7 A Mr. Edwards, I would like to answer that
8 question. My attorneys have told me today, I
9 have to at least today assert my Fifth Amendment,
10 Sixth Amendment and Fourteenth Amendment rights
11 to the U.S. Constitution, especially my concern
12 is, that your firm has filed fraudulent lawsuits,
13 fabricated lawsuits, and the U.S. Attorney, the
14 current U.S. Attorney has described your firm as
15 a criminal enterprise that -- whose main purpose
16 was to generate money for the firm and its
17 co-conspirators through the operation of various
18 criminal activities, including mail fraud, wire
19 fraud and money laundering.

20 **Q Are you saying that the complaint of**
21 **█ against you, the allegation in that**
22 **complaint, are false?**

23 MR. PIKE: Form. Misinterprets the
24 witness's testimony.

25 **Q Or saying it is true?**

1 MR. PIKE: Same objection.

2 **Q It is either true or false?**

3 A I'll repeat myself, unfortunately, but
4 the current U.S. Attorney has described your law
5 firm that filed that filed █ claim -- was
6 involved in the filing of █ claim,
7 motions -- I'm sorry, do you want to tell me what
8 it was then? Would you like to tell me the
9 firm's involvement in this lawsuit, since we will
10 be here the rest of the day?

11 **Q Answer the question.**

12 A All right.

13 The U.S. Attorney has described that
14 firm as a criminal enterprise perpetrating one of
15 the largest frauds in Florida's history against
16 unsuspecting investors, fleecing them out of
17 millions of dollars by creating, crafting and
18 fabricating fellacious (sic) sexual claims
19 against people like me and others, so
20 unfortunately, though I would like to answer your
21 questions, Mr. Edwards, my counsel has advised me
22 that at least today I must assert my Sixth
23 Amendment, Fifth Amendment and Fourteenth
24 Amendment rights under the U.S. Constitution.

25 **Q Isn't it true, sir, and I'm reading from**

1 the complaint filed by █ against you, isn't it
2 true, sir, that a friend of yours sent you three,
3 12-year old females for you to sexually abuse on
4 one of your birthdays?

5 MR. PIKE: Form, argumentative,
6 harassing, and irrelevant to this lawsuit.

7 THE WITNESS: Excuse me.

8 A You're saying it is part of the
9 lawsuit?

10 **Q Yes, I'll read it.**

11 "On one of the defendant Epstein's
12 birthdays, a friend of defendant Epstein sent him
13 three, 12-year old girls from █ ho spoke no
14 █ for defendant to sexually exploit and
15 abuse? After doing so they were sent back to
16 █ he next day."

17 **Isn't that true?**

18 MR. PIKE: Once again, move to strike,
19 irrelevant, argumentative, harassing, and
20 for the record, the exhibit that's being
21 read from is a complaint that's unrelated to
22 the instant matter and not filed or
23 incorporated by the current plaintiff █
24 in this matter.

25 A I would like to answer that question, I

1 really would; however, today my attorneys have
2 told me I have to assert my Fifth Amendment,
3 Sixth Amendment and Fourteenth Amendment rights
4 of the U.S. Constitution, especially because your
5 firm involved in this lawsuit has fabricated,
6 widely reported, multiple cases of sexual
7 harassment cases against individuals like me and
8 others, perpetrating what the U.S. Attorney
9 called one of the largest frauds in Florida's
10 history, fleecing people out of millions of
11 dollars, so though I would like to answer that
12 question, today I have to assert those rights or
13 risk losing my attorneys' counsel.

14 **Q Isn't it true that you forced █ as a**
15 **15-year old girl to have sex with numerous**
16 **friends of yours?**

17 A Are you kidding?

18 **Q Reading from a lawsuit.**

19 A Sorry, Mr. Edwards. Though I would like
20 to answer that question as well, as I've answered
21 most of your other questions here today, I would
22 like to respond; however, my attorneys here today
23 have advised me I have to assert my Fifth
24 Amendment, Sixth Amendment and Fourteenth
25 Amendment rights under the U.S. Constitution,

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1 especially as your firm has been accused by the
2 U.S. Attorney as being a criminal enterprise, and
3 part of the largest fraud in Florida's history.
4 Basically -- sorry, if I didn't read correctly,
5 um.... the operation of the enterprise through
6 various criminal activities including mail fraud,
7 wire fraud and money laundering, fabricating
8 sexual harassment cases against people like me
9 and others.

10 Q By the way --
11 A Yes, sir?

12 Q -- didn't [REDACTED] receive a round trip
13 ticket paid for by you to [REDACTED] and she
14 ultimately did not get back on the plane but
15 instead escaped to [REDACTED]

16 A I would like to answer that question,
17 but today I would have to assert my Sixth
18 Amendment rights, my Fifth Amendment rights and
19 my Fourteenth Amendment rights under the U.S.
20 Constitution, especially since your firm has been
21 described as perpetrating one of the largest
22 frauds in Florida's history, fleecing investors
23 out of millions of dollars, being described by
24 the U.S. Attorney of South Florida, as a criminal
25 enterprise engaged in various criminal activities

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1 including mail fraud, wire fraud and money
2 laundering.

3 Q Do you know a man named Jean Luc
4 Brunel?

5 A Can you spell it?

6 Q He was at your house last week, does
7 that remind you?

8 MR. PIKE: Form, move to strike,
9 speculation, argumentative, harassing.
10 Is there a question on the table, Mr.
11 Edwards?

12 MR. EDWARDS: Yes.

13 Q Do you know him?
14 A Can you spell his name for me, please?

15 Q I don't need to spell his name. Do you
16 know who I'm talking about, Mr. Brunel?
17 A Sorry, Mr. what?

18 Q B-r-u-n-e-l.
19 A I would like to answer that question as
20 well, but my attorneys have counseled me today I
21 have to assert my Sixth Amendment rights, Fifth
22 Amendment rights and Fourteenth Amendment rights
23 under the U.S. Constitution or risk losing my
24 right to effective representation.

25 Q What's the purpose for you asking me to

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1 spell his name? Are you acting like you don't
2 know him?

3 MR. PIKE: Form, move to strike,
4 argumentative and irrelevant as worded.
5 Mr. Edwards, you know that there are
6 various standing orders, if not in this
7 case, in various other cases, that
8 specifically describe the protections of the
9 Fifth Amendment. Federal Courts have
10 ordered that certain questions that you are
11 asking shall not be answered or Mr. Epstein
12 would risk losing his Fifth Amendment
13 right --

14 MR. EDWARDS: I understand that. He is
15 asking to spell people's names.

16 MR. PIKE: -- under the United States
17 Constitution. A lot of these questions here
18 today that you're asking have already been
19 ruled on by various Courts, that the Fifth
20 Amendment protects any response thereto, so
21 I would like -- I'm giving you some leeway
22 here with regard to the argumentative
23 questions. We've already -- and I'm not
24 obviously testifying for the witness, but
25 we've already handled a lot of these issues

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1 in court and we have already adjourned one
2 deposition for being argumentative, and I
3 think you understand what the Court said
4 there, so having said that, and I understand
5 that you have a job to do, but having said
6 that, I would like to caution you
7 professionally, if you continue with the
8 argumentative questions, I am going to have
9 to terminate this deposition --

10 MR. EDWARDS: I completely understand.
11 MR. PIKE: Okay. We are here today
12 to --

13 MR. EDWARDS: Mr. Brunel --
14 MR. PIKE: I want the Court to know we
15 are here today to allow you to ask your
16 questions, but the harassing and
17 argumentative tone is not going to be
18 tolerated.

19 MR. EDWARDS: We have a video. We can
20 show the Court the tone. It is obviously
21 not harassing.
22 MR. PIKE: That's fine.

23 Q Mr. Brunel is a long-term friend of
24 yours, right?
25 A I intend to respond to all relevant

1 questions of this lawsuit; however, today my
2 attorneys have counseled me I cannot provide
3 answers to any questions that may be relevant to
4 this lawsuit and I must accept their advice or
5 risk losing my Sixth Amendment right to effective
6 representation.

7 **Q You know him as somebody who has been**
8 **caught engaging in sex with underage minors in**
9 **the past; is that correct?**

10 MR. PIKE: Form.

11 A You will have to repeat the question,
12 I'm sorry.

13 **Q You know Mr. Brunel as somebody who has**
14 **been caught engaging in sex with minors in the**
15 **past; is that correct?**

16 MR. PIKE: Form.

17 A I intend to respond to all relevant
18 questions regarding this lawsuit; however, at the
19 present time my attorneys have counseled me that
20 I cannot provide answers to any questions
21 relevant to this lawsuit, and I must accept their
22 advice or risk losing my Sixth Amendment right to
23 effective representation as your firm has been
24 described by the U.S. Attorney as a criminal
25 enterprise and part of one of the largest frauds

1 that I cannot provide answers to any questions
2 relevant to this lawsuit and I must accept their
3 advice or risk losing my Fifth, Sixth and
4 Fourteenth Amendment rights under the U.S.
5 Constitution.

6 **Q When you were being criminally**
7 **investigated and [REDACTED] was in [REDACTED], is it**
8 **true that you made a personal telephone call to**
9 **her telling her not to come forward with any of**
10 **the information she knew?**

11 MR. PIKE: Form.

12 A Again?

13 **Q Putting a time frame on it, the time**
14 **frame where you were being criminally**
15 **investigated --**

16 A What time frame is that?

17 **Q In her complaint it is not specific,**
18 **but, let's just make it whenever. At some point**
19 **in time did you place a telephone call to [REDACTED] in**
20 **[REDACTED] warning her not to come forward with**
21 **any information about you engaging in sex with**
22 **her while she was a minor?**

23 MR. PIKE: Form.

24 A I intend to respond to all relevant
25 questions regarding this lawsuit; however, at the

1 in Florida's history specifically said you have
2 been fabricating -- the law firm has been
3 fabricating multiple cases of a sexual nature in
4 order to fleece unsuspecting investors out of
5 millions of dollars, including mail fraud, wire
6 fraud and money laundering, so unfortunately,
7 though I would like to answer all your questions
8 here today, I must assert my Sixth Amendment,
9 Fourteenth Amendment and Fifth Amendment right.

10 **Q You were involved in a modeling business**
11 **with him called M.C. Squared; is that correct?**

12 A Again?

13 **Q You were involved in a modeling agency**
14 **with --**

15 A What do you mean --

16 **Q -- with Mr. Brunel called M.C. Squared?**

17 A "Involved" means what, what do you
18 mean?

19 **Q You tell the jury your involvement with**
20 **the modeling agency. You can clarify for me,**
21 **I'll let you do that.**

22 MR. PIKE: Object to the form.

23 A I intend to respond to all relevant
24 questions regarding this lawsuit. However, at
25 the present time my attorneys have counseled me

1 present time my attorneys have counseled me that
2 I cannot provide answers to any questions
3 relevant to this lawsuit and I must accept their
4 advice or risk losing my Sixth Amendment right to
5 effective representation.

6 **Q With respect to underage females, isn't**
7 **it true that you have made the statement, in**
8 **quotes, "the younger the better"?**

9 MR. PIKE: Form.

10 A Again, as your firm has been described
11 by the current U.S. Attorney as a criminal
12 enterprise involved in mail fraud, wire fraud,
13 money laundering, and specifically crafting,
14 fabricating multiple cases of sexual -- of a
15 sexual nature against people like me, and others,
16 in order to fleece many, many unsuspecting
17 investors out of millions of dollars; I would
18 like to answer your questions here today, Mr.
19 Edwards, but unfortunately, my attorneys have
20 counseled me that I must assert my Fifth, Sixth
21 and Fourteenth Amendment right or they will
22 resign.

23 **Q Who are your current employees?**

24 MR. PIKE: Form.

25 A Say that again.

1 **Q Who are your current employees, people**
2 **who work for you, that you pay?**

3 A I intend to respond to all relevant
4 questions regarding this lawsuit; however, at the
5 present time my attorneys have counseled me that
6 I cannot provide answers to any questions that
7 may be relevant to this lawsuit, or risk losing
8 my Sixth Amendment right to effective
9 representation. Accordingly, therefore, I must
10 assert my Sixth Amendment, Sixth Amendment and
11 Fourteenth Amendment rights as provided by the
12 U.S. Constitution.

13 **Q Isn't it true you pay your employees to**
14 **bring you underage minor females for sex?**

15 MR. PIKE: Form, argumentative,
16 speculation, harassing.

17 A Mr. Edwards, your firm has been
18 described the current U.S. Attorney as a criminal
19 enterprise, a criminal enterprise, part of the
20 largest fraud in South Florida's history; but
21 part of that fraud was fabricating, um,
22 fictitious cases against me -- excuse me, against
23 people like me, of a sexual nature, in order to
24 fleece unsuspecting investors out of millions of
25 dollars.

1 Unfortunately at this time, though, I
2 would like to answer every one of your
3 questions. My attorney has advised me I must
4 assert my Sixth Amendment, Fourteenth Amendment
5 and Fifth Amendment rights or risk losing them as
6 my attorneys.

7 **Q Isn't it true when underage females were**
8 **brought to you, you would engage in sex with them**
9 **and pay them?**

10 MR. PIKE: Form, argumentative,
11 harassing.

12 A (Witness shakes head.)

13 **Q Are you shaking your head to say "no" --**

14 A Excuse me.

15 **Q Are you shaking your head to say "no, I**
16 **don't know how to interpret that answer?"**

17 A I didn't realize I was shaking my head.

18 MR. EDWARDS: I thought he was actually
19 answering a question.

20 MR. PIKE: We'll just strike. The rules
21 are well-known to every lawyer who practices
22 in the State of Florida, that it is clear
23 that a nod of the head or shake of the head
24 is not understood by the record, so
25 therefore Mr. Epstein was clearly not

1 responding to one of your questions and you
2 know that, Mr. Edwards.

3 MR. EDWARDS: This is on the video.

4 MR. PIKE: Nonetheless you know the
5 rules. Nonetheless. If we have a question
6 on the table, would you please repeat it so
7 I can recall it and Mr. Epstein can endeavor
8 to answer it.

9 MR. EDWARDS: Sure, and if it was only
10 the court reporter, I would agree, but the
11 jury is going to see a video and everybody
12 knows commonly, if somebody shakes their
13 head, they are saying "no," and if that was
14 the answer, I wanted to give him a chance to
15 elaborate on it, that's it.

16 **Q Isn't it true that when underage females**
17 **would come to your house, you would engage in**
18 **sexual activity with them and then pay them?**

19 MR. PIKE: Same objections.

20 A Unfortunately I would like to answer
21 that question today, but my attorneys have
22 counseled me that I must assert my Sixth
23 Amendment right, my Fifth Amendment right and my
24 Fourteenth Amendment right under the U.S.
25 Constitution.

1 The fact that your firm has been
2 described as a criminal enterprise and part of
3 one of the largest frauds in Florida's -- South
4 Florida's history, part of that fraud has been
5 described as fabricating cases of sexual nature
6 against me and others in order to fleece
7 unsuspecting investors out of millions of
8 dollars. I would like to answer that question,
9 Mr. Edwards; however, today, I must assert my
10 Fifth, Sixth and Fourteenth Amendment right.

11 **Q In addition to paying these underage**
12 **females for sexual activity, you also paid them**
13 **to bring their underage friends to you, to also**
14 **engage in sexual activity with them?**

15 MR. PIKE: Form.

16 **Q Is that correct?**

17 A I intend to respond to all relevant
18 questions regarding this lawsuit; however, at the
19 present time my attorneys have counseled me that
20 I may not, and I must assert -- they have advised
21 me I must assert my Sixth Amendment right, my
22 Fifth Amendment right and my Fourteenth Amendment
23 rights under the U.S. Constitution.

24 **Q You would pay underage females 200 to**
25 **\$300 for engaging in sexual activity with you or**

1 **for procuring another underage female to engage**
2 **in sexual activity with you; is that correct?**

3 MR. PIKE: Form, move to strike.

4 Assumes facts not in evidence and calls for
5 a legal conclusion as well, argumentative.

6 A I intend to respond to all relevant
7 questions regarding this lawsuit; however, at the
8 present time my attorneys have counseled me that
9 I cannot provide answers to any questions that
10 may be relevant to this lawsuit, and I must
11 accept their advice or risk losing my Sixth
12 Amendment right to effective representation.

13 Accordingly, therefore, I must assert my
14 constitutional rights as guaranteed by the Fifth,
15 Sixth and Fourteenth Amendment to the U.S.
16 Constitution.

17 **Q Would you agree that your scheme was**
18 **devised to coerce these underage minors to bring**
19 **you as many other underage minors, as were**
20 **available for you to engage in sexual activity**
21 **with?**

22 MR. PIKE: Form.

23 A Can you repeat the question?

24 **Q Yes. Would you agree that your scheme**
25 **was devised to coerce underage girls into**

1 Attorney, and as part of the largest fraud in
2 South Florida's history, and as part of the fraud
3 fabricating malicious cases of sexual harassment
4 and other cases of sexual nature against people
5 like me and others, although I would like to
6 answer that question today, my attorneys have
7 advised me I must assert my Sixth Amendment,
8 Fourteenth Amendment and Fifth Amendment rights
9 of the U.S. Constitution. Although I believe you
10 know I would really like to answer your
11 questions, but at this moment if I don't assert
12 those rights, I risk having my attorneys resign.

13 **Q Isn't it true with this method you were**
14 **able to interact sexually with underage girls**
15 **every single day?**

16 MR. PIKE: Form, asked and answered.

17 Same objections.

18 **Q Go ahead.**

19 A Oh, I'm sorry. Can you repeat it?

20 **Q Sure. With this method of --**

21 A "This method" being what, sorry?

22 **Q Your method of using underage minors to**
23 **bring you other underage minors for sex; isn't it**
24 **true that that method resulted in you engaging in**
25 **sexual activity with underage minors on an every**

1 **bringing as many other underage girls to you, as**
2 **were available for sexual purposes?**

3 MR. PIKE: Form.

4 A Did you say "for sexual purposes"?

5 **Q Yes, for sexual purposes.**

6 A I'm not surprised. Since your firm was
7 described as perpetrating one of the largest
8 frauds in Florida's history by crafting,
9 fabricated sexual harassment cases against people
10 like me and others in order to fleece
11 unsuspecting investors out of millions of
12 dollars, I would like to answer that question.
13 However, today my attorneys have advised me I
14 must assert my Sixth Amendment, Fifth Amendment
15 and Fourteenth Amendment right under the U.S.
16 Constitution, and if I don't do so, I risk
17 losing -- uh... losing effective representation.

18 **Q Utilizing this method of using underage**
19 **minors to bring you other underage minors, you**
20 **were able to engage in sex with hundreds of**
21 **underage minor females. Is that true?**

22 MR. PIKE: Form, argumentative,
23 harassing and calls for speculation.

24 A Since, Mr. Edwards, your firm has been
25 described as a criminal enterprise by the U.S.

1 **day basis?**

2 MR. PIKE: Same objections.

3 A Your firm has been described by the
4 current U.S. Attorney as a criminal enterprise
5 engaged in one of the largest frauds in South
6 Florida's history, and as part of that fraud,
7 creating, fabricating, malicious cases of sexual
8 nature against people like me and others, so
9 unfortunately, though I would like to answer that
10 question today, I must assert my Sixth Amendment,
11 Fourteenth Amendment and Fifth Amendment rights
12 to my counsel's advisement to do, although I
13 believe you know I would really like to answer
14 those questions today, I must assert those rights
15 or risk losing my attorney's representation.

16 **Q To keep track of all these underage**
17 **minors, you stored their names and telephone**
18 **numbers in your home computer; isn't that**
19 **correct?**

20 MR. PIKE: Form, argumentative,
21 speculation.

22 A Again? Sorry.

23 **Q Are you going to answer the question or**
24 **just read? If you are going to answer the**
25 **question, of course, I'll keep reading it as many**

1 times.

2 A Excuse me?

3 MR. PIKE: The witness is attempting to
4 answer your question. He asked you to
5 repeat the question.

6 MR. EDWARDS: He is?

7 MR. PIKE: He asked you to repeat the
8 question.

9 MR. EDWARDS: I don't mind going through
10 that, Mike, because I do want answers, but
11 if I'm going to repeat the question multiple
12 times and get the same answer, we are
13 wasting time. I want to stop us wasting
14 time repeating questions if I'm getting the
15 same nonresponsive answer.

16 MR. PIKE: I understand your intention
17 here.

18 MR. EDWARDS: Yeah.

19 MR. PIKE: -- however, these questions
20 are similar in nature, if not identical to
21 various questions that you've asked in other
22 indications, so you coming here today is of
23 no surprise that Mr. Epstein is required to
24 invoke his Fifth, Sixth and Fourteenth
25 Amendment rights under the United States

1 answer each one of your questions today, Mr.
2 Edwards, my attorneys have advised me that I must
3 assert my Sixth Amendment, Fifth Amendment and
4 Fourteenth Amendment rights under the U.S.
5 Constitution. So although I would like to
6 answer, I must assert those rights or risk having
7 my attorneys resign.

8 **Q Do you know** [REDACTED]

9 A I intend to respond to all relevant
10 questions regarding this lawsuit; however, at the
11 present time my attorneys have counseled me that
12 I cannot provide answers to any questions
13 relevant to this lawsuit and must accept their
14 advice or risk losing my Sixth Amendment right to
15 effective representation.

16 **Q Isn't it true you employed** [REDACTED]
17 **to contact underage minor females and make them**
18 **appointments to be at your house?**

19 A Sorry, again?

20 **Q Isn't it true you employed** [REDACTED]
21 **for the purposes of contacting underage minor**
22 **females and scheduling them appointments to be at**
23 **your house?**

24 A The current U.S. Attorney has described
25 your law firm, Mr. Edwards, as a criminal

1 Constitution --

2 MR. EDWARDS: I understand that.

3 MR. PIKE: -- if you came here today
4 thinking you were going to pull a rabbit out
5 of a habit, and Mr. Epstein was going to
6 waive his Fifth, Sixth and Fourteenth
7 Amendment rights to the U.S. Constitution,
8 at least not today. That will not be
9 occurring.

10 **Q Isn't it true that to keep track of the**
11 **names and phone numbers of these underage minor**
12 **females, to interact with sexually, you stored**
13 **those names and phone numbers in your home**
14 **computer?**

15 A Thank you. I've heard the question
16 now. It didn't surprise -- again, I've now heard
17 the question and the fact that your firm has been
18 described as a criminal enterprise by the current
19 U.S. Attorney in South Florida, and part of one
20 of the largest frauds in Florida's history, it is
21 reported that your firm fabricated malicious
22 cases of a sexual nature against people and
23 against me, in order to fleece unsuspecting
24 investors out of millions of dollars.

25 Unfortunately, though I would like to

1 enterprise engaged in one of the largest frauds
2 in South Florida's history. It has been reported
3 that your firm fabricated multiple cases of a
4 sexual nature against me and others, in order to
5 fleece unsuspecting investors out of millions and
6 millions of dollars, so, though unfortunately I
7 would like to answer every one of your questions
8 today my attorneys have counseled me that today I
9 must assert my Sixth Amendment, Fifth Amendment
10 and Fourteenth Amendment rights under the U.S.
11 Constitution. Though I believe you know I would
12 like to answer those questions, although today I
13 must assert those rights or risk having my
14 attorneys resign.

15 **Q Tell the jury how you know** [REDACTED]

16 [REDACTED]

17 MR. PIKE: Form move to strike.

18 MR. EDWARDS: Move to strike my
19 question?

20 MR. PIKE: (Nods.)

21 MR. EDWARDS: What basis?

22 ** MR. PIKE: Do I have to state a
23 basis? Usually I'm just required to state
24 "form."

25 MR. EDWARDS: You have done more than

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1 that today.

2 MR. PIKE: If I went on a diatribe of

3 explaining, you know, what's confusing,

4 compound and relevant, then you would blame

5 for testifying for the witness. So I just

6 move to strike the question.

7 MR. EDWARDS: Make sure you mark that

8 somewhere on this transcript, somehow.

9 **Q Tell the jury how you know [REDACTED]**

10 **[REDACTED]**?

11 MR. PIKE: Move to strike.

12 A I intend to respond to all relevant

13 questions regarding this lawsuit. However, at

14 the present time my attorneys have counseled me

15 that I cannot provide answers to any questions

16 relevant to this lawsuit and must accept their

17 advice or risk losing my Sixth Amendment right to

18 effective representation. Accordingly, I assert

19 my Fifth Amendment, Sixth Amendment and

20 Fourteenth Amendment right under the U.S.

21 Constitution.

22 **Q Isn't it true that you brought her to**

23 **this country when she was underage and made her**

24 **your sex slave, and you've bragged about this?**

25 MR. PIKE: Form, argumentative,

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1 compound, harassing and calls for

2 speculation.

3 A I intend to respond to all relevant

4 questions regarding this lawsuit; however, at the

5 present time my attorneys have counseled me that

6 I cannot provide answers to any questions

7 relative to this lawsuit and I must accept this

8 advice or risk losing my Sixth Amendment right to

9 effective representation. However, I would like,

10 so I'm clear, the question was, did I bring her

11 here? Specifically --

12 **Q Your answer is fine.**

13 A Okay.

14 **Q Is it true that you demanded numerous**

15 **underage minor females to have sex with [REDACTED]**

16 **[REDACTED] inside your home while you watched,**

17 **masturbating?**

18 MR. PIKE: Same objections.

19 A You have to repeat the question.

20 **Q Isn't it true that you have ordered**

21 **several underage minor females to have sex with**

22 **[REDACTED] in your home while you watched,**

23 **masturbating?**

24 MR. PIKE: Same objections.

25 A The current U.S. Attorney has described

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1 your firm, Mr. Edwards, as a criminal enterprise

2 involved in mail fraud, wire fraud, money

3 laundering and, in fact, fabricating multiple

4 cases of a sexual nature against me, others, in

5 order to fleece unsuspecting investors in South

6 Florida out of millions and millions of dollars.

7 Unfortunately, though I would like to

8 answer each one of your questions here today, my

9 attorneys have advised me I must assert my Sixth

10 Amendment, Fourteenth Amendment and Fifth

11 Amendment right under the U.S. Constitution,

12 although I believe you know I would like to

13 answer your questions, but at this moment I must

14 assert those rights or risk having my attorneys

15 resign.

16 **Q Isn't it true that with each of these**

17 **underage minor females that were brought to your**

18 **house, your method of sexually exploiting them**

19 **was nearly identical; is that correct?**

20 MR. PIKE: Objection, argumentative,

21 confusing, overbroad and vague.

22 A I don't even understand the question.

23 **Q Okay. When a 14 or 15-year old would be**

24 **led into your bedroom, you would appear from the**

25 **shower first, usually naked; is that correct?**

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1 MR. PIKE: Objection, argumentative,

2 assumes facts not in evidence, and

3 harassing.

4 A I intend to respond to all relevant

5 questions regarding this lawsuit; however, today

6 my attorneys have advised me that I cannot

7 provide answers to any questions relevant to this

8 lawsuit and must accept their advice or risk

9 losing my Sixth Amendment right to effective

10 representation. Accordingly, therefore, I must

11 assert my Constitutional rights -- the Fifth

12 Amendment, Sixth Amendment and Fourteenth

13 Amendments to the U.S. Constitution.

14 MR. PIKE: Can we go off the record for

15 a second?

16 MR. EDWARDS: If it is necessary.

17 MR. PIKE: Yes, let's go off the

18 record.

19 THE VIDEOGRAPHER: Going off the video

20 record at 12:35 p.m.

21 (Pause in the proceedings.)

22 THE VIDEOGRAPHER: Back on the video

23 record 12:44 p.m.

24 MR. EDWARDS: Can you tell me what my

25 last question is?

1 THE COURT REPORTER: Certainly.
2 (The record was read.)

3 **Q After appearing from the shower naked,**
4 **you would order the underage minor female to**
5 **disrobe; isn't that true?**

6 MR. PIKE: Same objections. Form.

7 A I intend to respond to all relevant
8 questions regarding this lawsuit; however, at the
9 present time my attorneys have counseled me I
10 cannot provide answers to any questions relevant
11 to this lawsuit and must accept their advice or
12 risk losing my Sixth Amendment right to effective
13 representation.

14 **Q You would then order them to, or order**
15 **her to begin providing you a massage; is that**
16 **correct?**

17 MR. PIKE: Form.

18 A I intend to respond to all relevant
19 questions regarding this lawsuit and I would like
20 to answer each and every one of your questions
21 today, Mr. Edwards; however, my attorneys have
22 told me that I cannot do that today unless and I
23 must assert my Sixth Amendment, Fifth Amendment
24 and Fourteenth Amendment rights under the U.S.
25 Constitution or risk losing my counsel.

1 Therefore, I'm going to assert those rights as
2 guaranteed by the Fifth Amendment, Sixth
3 Amendment and Fourteenth Amendment.

4 **Q You would then roll over and continue**
5 **with masturbating; is that correct?**

6 MR. PIKE: Form.

7 A I intend to respond to all relevant
8 questions regarding this lawsuit. It is -- it is
9 my understanding that the current U.S. Attorney
10 has described your law firm as a criminal
11 enterprise, yours and Mr. Jaffe's firm, as a
12 criminal enterprise and part of the largest fraud
13 in Florida's history, fabricating malicious cases
14 of a sexual nature against me and others, in
15 order to fleece investors out of millions of
16 dollars, through bogus schemes including
17 conspiracy to -- excuse me -- to commit mail
18 fraud, wire fraud and money laundering, so though
19 I would like to answer each and every one of your
20 questions here today, my attorneys have counseled
21 me I cannot, and must assert my Fifth, Sixth and
22 Fourteenth Amendment rights under the U.S.
23 Constitution.

24 **Q You would then rub the underage minor**
25 **female's vagina and/or insert your fingers into**

1 **her vagina; is that correct?**

2 MR. PIKE: Form.

3 A I intend to respond to all relevant
4 questions regarding this lawsuit. Unfortunately,
5 today my attorneys have advised me I cannot, must
6 assert my rights under the U.S. Constitution,
7 under the Fifth Amendment and Sixth amendment and
8 Fourteenth amendments of the U.S. Constitution,
9 especially since your firm has been described as
10 a criminal enterprise by the current U.S.

11 Attorney perpetrating one of the largest frauds
12 in South Florida's history, fleecing investors
13 out of millions of dollars by fabricating
14 malicious cases, malicious cases of a sexual
15 nature against people like me and others.

16 **Q With many of these underage minors you**
17 **would use vibrators on them; is that correct?**

18 MR. PIKE: Form.

19 A I would like to respond to that question
20 as I would like to respond to all your other
21 questions today. However, my attorneys have
22 counseled me that I must assert my Sixth
23 Amendment rights, my Fifth Amendment rights and
24 my Fourteenth Amendment rights under the U.S.
25 Constitution.

1 **Q And with many of these underage minors,**
2 **you would give and/or receive oral sex from them;**
3 **is that correct?**

4 MR. PIKE: Form.

5 A I intend to respond to all relevant
6 questions regarding this lawsuit, and I would
7 like to answer each and every one of your
8 questions; however, my attorneys have counseled
9 me that today I must assert my Sixth Amendment,
10 Fifth Amendment and Fourteenth Amendment rights
11 under the U.S. Constitution, especially since
12 your firm has been described by the current U.S.
13 Attorney as perpetrating one of the largest
14 frauds in Florida -- in Florida's history, by
15 fabricating malicious cases of a sexual nature
16 against me and others.

17 **Q In June of 2008 you pled guilty to a**
18 **couple of felonies, right?**

19 MR. PIKE: Form, vague and confusing.

20 A Again?

21 **Q In June of 2008, you pled guilty to two**
22 **felonies; is that correct?**

23 MR. PIKE: Same objection.

24 A Yes.

25 **Q And what were those felonies that you**

1 pled guilty to?

2 A Solicitation of prostitutes, not
3 underage prostitutes but simply prostitutes.
4 Solicitation of prostitutes and one count of
5 procuring a minor for underage sex.

6 Q You have taken the Fifth as to questions
7 related to many of these underage minors, but the
8 underage minors that were the victims in the
9 cases where you pled guilty, were [REDACTED] is that
10 one of them?

11 MR. PIKE: Form, mischaracterizes the
12 witness's testimony. Calls for a legal
13 conclusion?

14 A Again.

15 Q What was the name of the any of the
16 underage minors that were the subject of the
17 criminal charges to which you pled guilty?

18 A I don't know.

19 Q So, tell me about those charges. What
20 were the allegations of those charges?

21 MR. PIKE: Form.

22 A Solicitation of prostitution, not
23 underage prostitution... Prostitution.

24 Q Were the victims or the prostitutes, as
25 you would say, were they minors?

1 MR. PIKE: Form.

2 A I pled guilty to solicitation of
3 prostitution.

4 Q Okay, so tell me what those cases were
5 about. What happened?

6 MR. PIKE: Form again.

7 A I... (Witness shrugs.) I can't tell you
8 any more than that.

9 Q You don't know what you pled guilty to?

10 A I just told you --

11 MR. PIKE: Object to the form, asked and
12 answered.

13 Q Do you know what you pled guilty to, the
14 facts?

15 A Solicitation of prostitution.

16 Q I understand that that's the charge.
17 What were the underlying facts? What did you do,
18 did you pull up in a car, talk to the person, did
19 they come over to your house, how did you get
20 them, those kinds of things. Tell the jury what
21 were the underlying facts about the charges you
22 pled guilty to?

23 MR. PIKE: Object to the form. Move to
24 strike.

25 A I don't know.

1 Q You don't know what you pled guilty to?

2 A I pled guilty to solicitation of
3 prostitution, not underage prostitution, but
4 prostitution.

5 Q My understanding from reading the court
6 files that one of these females was [REDACTED]. Do you
7 know who that is?

8 A I intend to respond to all relevant
9 questions in this lawsuit. However, at the
10 present time my attorneys have counseled me that
11 I cannot provide answers to any of these
12 questions today. So accordingly, I must assert
13 my constitutional rights under the Fifth, Sixth
14 and Fourteenth Amendments of the U.S.
15 Constitution.

16 Q You're aware [REDACTED] is somebody that
17 alleges she was at your house on more than 100
18 occasions; is that true?

19 MR. PIKE: Form.

20 A Can you repeat the question, sir?

21 Q Are you aware that [REDACTED] is a female that
22 alleges that when she was underage, she was at
23 your house on more than 100 occasions?

24 MR. PIKE: Form, predicate.

25 A I intend to respond to all relevant

1 questions to this lawsuit, Mr. Edwards. However,
2 today my attorneys have counseled me that I must
3 respond by invoking my Fifth Amendment right, my
4 Sixth Amendment right and my Fourteenth Amendment
5 right under the U.S. Constitution or risk losing
6 them as my attorneys, so therefore I must assert
7 those rights.

8 Q You understand that her complaint was
9 that Epstein turned [REDACTED] on to her stomach on the
10 massage bed and inserted his penis in to her
11 vagina, [REDACTED] Stated Epstein began to pump his penis
12 in her vagina and, she became upset over this.
13 She said her head was being held against the bed
14 forcibly as he continued to pump inside of her
15 while she screamed "no."

16 Are you aware of those allegations?

17 MR. PIKE: Form, predicate.

18 A I'm sorry, did you say there is a
19 complaint?

20 Q In the incident report that led to a
21 charging document, that led to a charge that you
22 have pled guilty to. Are you aware of that
23 information coming from [REDACTED]?

24 MR. PIKE: I'm sorry, Mr. Edwards; what
25 are you reading from?

1 MR. EDWARDS: The 87-page Palm Beach
2 Police Department incident report where
3 there are numerous underage females
4 describing their interaction with Mr.
5 Epstein at his house. I'm reading
6 specifically from page 41 related to [REDACTED]
7 who was one of the victims he pled guilty
8 to.

9 MR. PIKE: Is that the same document
10 that you're seeking production of, in this
11 same exact case?

12 MR. EDWARDS: I don't know what you're
13 talking about. This is something from the
14 State Attorney's file.

15 MR. PIKE: Okay. Sorry. What's the
16 question?

17 **Q Are you aware of that allegation? What**
18 **I just read to you.**

19 A I would like to answer that question,
20 but, however, today my attorneys have advised me
21 I must assert my Fifth Amendment, Sixth Amendment
22 and Fourteenth Amendment rights under the U.S.
23 Constitution.

24 **Q Assuming your attorneys have advised you**
25 **but because of Res Judicata, double jeopardy, you**

1 cannot be charged for any crimes that you have
2 already pled guilty to relating to [REDACTED], so I
3 would like you to explain to the jury, in your
4 words, or your version of the story, what was
5 your interaction with [REDACTED] at your house when she
6 was a minor?

7 MR. PIKE: Object to the form as
8 worded. Could disclose attorney/client
9 communications.

10 A I intend to respond to all relevant
11 questions regarding this lawsuit. I would like
12 to answer each of your questions today, however,
13 my attorneys have counseled me that I may not.
14 They've advised me that I must assert my Fifth
15 Amendment, Sixth Amendment and Fourteenth
16 Amendment rights under the U.S. Constitution.
17 Therefore, if I don't, I risk losing their
18 counsel. Therefore, I must assert those rights
19 here today, Mr. Edwards.

20 **Q Are you aware that [REDACTED] advised police**
21 **that she was ripped and torn in her vagina area**
22 **and had difficulty walking to the car after this**
23 **episode where you forcibly inserted your penis**
24 **into her vagina?**

25 MR. PIKE: Objection, relevance,

1 argumentative, compound, harassing.

2 A This was who?

3 **Q The question is, are you aware [REDACTED]?**

4 A [REDACTED]

5 The current U.S. Attorney, since he has
6 described your firm as a criminal enterprise and
7 part of one of the largest frauds in Florida's
8 history by fabricating, fabricating, malicious
9 cases of a sexual nature against people like me
10 and others, and fleecing investors out of
11 millions of dollars by using means described in
12 the complaint against your firm, including mail
13 fraud, wire fraud, money laundering; I'm afraid
14 today, though I would like to answer each one of
15 your questions, my attorneys have counseled me
16 that I must not, I must assert my Sixth
17 Amendment, Fifth Amendment and Fourteenth
18 Amendment rights under the U.S. Constitution, and
19 I believe you know I would like to answer those
20 questions. I must assert those rights or risk
21 losing my attorney's representation.

22 **Q Do you know [REDACTED]?**

23 A Spell it, please.

24 **Q I don't know how to spell her name, but**
25 **do you know a [REDACTED]? I don't know that she would**

1 have ever spelled her name for you.

2 MR. PIKE: Form, move to strike.

3 **Q Her name is [REDACTED]**

4 A I intend to respond to all relevant
5 questions regarding this lawsuit. However, at
6 the present time my attorneys have counseled me
7 that I may not provide answers today, though I
8 would like to, and I must, in fact, take their
9 advice or risk losing their representation, so
10 therefore, I must assert those rights under the
11 U.S. Constitution.

12 **Q Do you know the names of any of the**
13 **females that you allegedly solicited for**
14 **prostitution and pled guilty to?**

15 MR. PIKE: Relevance.

16 A Sitting here today, no, I do not.

17 **Q You asked me to spell [REDACTED]'s name.**
18 **That's somebody that your attorneys took her**
19 **deposition about a year and a half ago. Does**
20 **that help to refresh your recollection as to who**
21 **[REDACTED] is?**

22 A I would like to answer that question but
23 today, according to my attorneys, I must assert
24 my Fifth Amendment, Sixth Amendment and
25 Fourteenth Amendment rights under the U.S.

1 Constitution. I must accept their advice or risk
2 losing my Sixth Amendment right to effective
3 representation, Mr. Edwards, so though I would
4 like to answer the question, today I must assert
5 those rights.

6 **Q** There is another victim, her name is
7 [REDACTED] that was listed as one of the females at
8 your house and you pled guilty to the
9 solicitation of.

10 I would like to ask you if you remember
11 her?

12 MR. PIKE: Form, confusing, compound.

13 A [REDACTED]?

14 **Q** I don't know her first time, initial [REDACTED]
15 last name is [REDACTED]

16 MR. PIKE: Same objection.

17 A I intend to respond to all relevant
18 questions regarding this lawsuit. However, at
19 the present time my attorneys have counseled me
20 that I cannot provide answers to any questions
21 relevant to this lawsuit, and I must accept their
22 advice or risk losing my right to effective
23 representation. Therefore, though I would like
24 to answer the questions, I must assert those
25 rights.

1 and Fourteenth Amendment rights to the U.S.
2 Constitution or risk losing effective
3 representation. Accordingly, I must assert my
4 rights as guaranteed by the Constitution.

5 **Q** Just so you are clear, since your
6 attorney made it an objection that it was
7 unclear, then you invoked your Fifth Amendment
8 rights --

9 A Sorry.

10 **Q** I'm talking about the cases where you
11 already pled guilty and you can't be charged
12 again. What were the facts and circumstances
13 that led up to you pleading guilty to these
14 felonies?

15 A I've answered the question.

16 MR. PIKE: Same objection, asked and
17 answered.

18 THE VIDEOGRAPHER: Counsel.
19 (Indicating five minutes left on tape.)

20 MR. EDWARDS: Okay.

21 **Q** Just so the jury understands, these
22 three females that were the subject of the guilty
23 pleas in State Court, were procured by your
24 method of having underage minor females locate
25 other underage minor females and bring them to

1 **Q** With each case that results in a
2 charge --

3 THE WITNESS: Excuse me, is there some
4 water?

5 THE VIDEOGRAPHER: Off the record?

6 MR. EDWARDS: Stopping again?

7 THE WITNESS: Can I get some water? Mr.
8 Jaffe, can you pass some water?

9 THE VIDEOGRAPHER: There is no water
10 here.

11 THE WITNESS: Sorry.

12 **Q** With each conviction, charge, or with
13 each charge that leads to a conviction, there are
14 facts and circumstances that lead up to that plea
15 of guilty.

16 MR. PIKE: Form.

17 **Q** What are the facts and circumstances
18 that led to you pleading guilty to the two
19 felonies that you've described?

20 MR. PIKE: Form, overbroad, compound,
21 confusing, calls for a legal conclusion.

22 A I would like to respond to that
23 question. I would like to respond to that
24 question, but today my attorneys have advised me
25 I must assert my Fifth Amendment, Sixth Amendment

1 your house; isn't that correct?

2 MR. PIKE: Objection, argumentative,
3 compound, harassing, assumes facts not in
4 evidence. I move to strike.

5 A You have to repeat the question.

6 **Q** Okay, [REDACTED] are all people
7 that were, at the time you engaged in sexual
8 activity with them, were underage and were
9 brought by other underage minor females; is that
10 true?

11 MR. PIKE: Same objections incorporated
12 as well as motion to strike.

13 A I don't understand -- I'm sorry, I don't
14 understand the question.

15 **Q** Isn't it true that you used underage
16 minor females to bring other underage minor
17 females to your house for sex?

18 MR. PIKE: Asked and answered.

19 A (Witness shrugs.)

20 MR. PIKE: Way earlier on.

21 MR. EDWARDS: He doesn't understand the
22 question --

23 MR. PIKE: You can answer the question.

24 **Q** I'm going through the progression.

25 MR. PIKE: You can answer, but it is

<p style="text-align: right;">82</p> <p>1 asked and answered.</p> <p>2 A As your firm, Mr. Edwards and Mr.</p> <p>3 Jaffe's has been described by the U.S. Attorney</p> <p>4 as perpetrating one of the largest frauds in</p> <p>5 South Florida's history by crafting malicious</p> <p>6 cases of a sexual nature against people like me</p> <p>7 and others, in order to fleece, using bogus</p> <p>8 schemes, in the U.S. Attorney's words, investment</p> <p>9 schemes. Unfortunately, though I would like to</p> <p>10 answer every one of your questions if I'm able,</p> <p>11 my attorneys have advised me I must assert my</p> <p>12 Sixth Amendment, Fourteenth Amendment and Fifth</p> <p>13 Amendment rights under the U.S. Constitution.</p> <p>14 Therefore, at the moment I cannot answer that</p> <p>15 question.</p> <p>16 Q The acts related to your guilty plea</p> <p>17 occurred at your Palm Beach house; is that</p> <p>18 correct?</p> <p>19 MR. PIKE: Form.</p> <p>20 A Again, sorry.</p> <p>21 Q If you were soliciting prostitutes, it</p> <p>22 wasn't out on the street, it wasn't at a hotel.</p> <p>23 These were girls that you solicited to be</p> <p>24 prostitutes at your house in Palm Beach,</p> <p>25 correct?</p>	<p style="text-align: right;">84</p> <p>1 1:05 p.m.</p> <p>2 (Pause in the proceedings.)</p> <p>3 THE VIDEOGRAPHER: Back on the video</p> <p>4 record 1:15 p.m.</p> <p>5 Q Mr. Epstein, as it relates to the</p> <p>6 charges you pled guilty to, are you saying today</p> <p>7 that those females that you interacted with</p> <p>8 sexually, were prostitutes prior to meeting you?</p> <p>9 A I'm saying I pled guilty to the</p> <p>10 solicitation of prostitution.</p> <p>11 Q Right, and you would certainly agree</p> <p>12 that that would require yourself and one other</p> <p>13 individual for that act of prostitution,</p> <p>14 correct?</p> <p>15 MR. PIKE: Form. Also calls for a legal</p> <p>16 conclusion.</p> <p>17 A I pled guilty to solicitation of</p> <p>18 prostitution.</p> <p>19 Q Are you saying that those females that</p> <p>20 were the victims, at least listed as victims by</p> <p>21 the State, were prostitutes prior to meeting</p> <p>22 you?</p> <p>23 MR. PIKE: Form. Vague. Irrelevant?</p> <p>24 A I pled guilty to solicitation of</p> <p>25 prostitution.</p>
<p style="text-align: right;">83</p> <p>1 MR. PIKE: Objection, relevance,</p> <p>2 argumentative. Calls for speculation as</p> <p>3 worded and assumes facts not in evidence.</p> <p>4 A Though I would like to answer that</p> <p>5 question, my attorneys today have advised me I</p> <p>6 cannot answer you today, and they've advised me I</p> <p>7 must assert my Sixth Amendment, Fifth Amendment</p> <p>8 and Fourteenth Amendment rights under the U.S.</p> <p>9 Constitution. Otherwise I risk losing their</p> <p>10 representation. So, accordingly I must assert</p> <p>11 those rights, Mr. Edwards, and Mr. Jaffe.</p> <p>12 Q In what county did you plead guilty to</p> <p>13 these felony offenses?</p> <p>14 A Palm Beach County.</p> <p>15 Q These were crimes that occurred here in</p> <p>16 Palm Beach County?</p> <p>17 MR. PIKE: Form.</p> <p>18 Q Is that correct?</p> <p>19 A ... I pled guilty in Palm Beach County.</p> <p>20 Q Isn't it true that you kept a calendar</p> <p>21 or schedule --</p> <p>22 THE VIDEOGRAPHER: I have to change the</p> <p>23 tape.</p> <p>24 MR. EDWARDS: Change it.</p> <p>25 THE VIDEOGRAPHER: Off the video record</p>	<p style="text-align: right;">85</p> <p>1 Q Do you have any remorse for your</p> <p>2 actions --</p> <p>3 MR. PIKE: Form.</p> <p>4 Q -- against these victims that led to</p> <p>5 your plea of guilty?</p> <p>6 MR. PIKE: Form, argumentative.</p> <p>7 A I pled guilty to solicitation of</p> <p>8 prostitution, not underage prostitution, simply,</p> <p>9 prostitution.</p> <p>10 Q Are you saying now that the subjects of</p> <p>11 that, which were called victims, were not</p> <p>12 underage when you engaged in sex with them?</p> <p>13 MR. PIKE: Form, argumentative,</p> <p>14 speculation, assumes facts not in evidence,</p> <p>15 as well as mischaracterizes the witness's</p> <p>16 testimony.</p> <p>17 A I pled guilty to solicitation of</p> <p>18 prostitution, not underage prostitution,</p> <p>19 solicitation of prostitution.</p> <p>20 Q I was under the impression you pled</p> <p>21 guilty to a second degree felony, that being</p> <p>22 procuring a minor for the purposes of</p> <p>23 prostitution.</p> <p>24 A That's correct.</p> <p>25 Q So a minor is somebody under the age of</p>

1 18, and I'm asking for the guilty plea related to
2 that count; are you at all remorseful for your
3 interactions with that minor?

4 MR. PIKE: Same objections.

5 A What minor?

6 Q The charge is procuring a minor. You
7 tell me. Who was that minor?

8 A I don't know.

9 Q You were never told during the State
10 Attorney's prosecution of you, who this person
11 was?

12 A No.

13 Q Why did you plead guilty to a felony
14 charge that resulted in you going to jail,
15 without even knowing who the victim was?

16 MR. PIKE: Form. That question calls
17 for attorney/client information, and
18 therefore, I'm going to instruct him not to
19 answer that.

20 Q If it has anything to do with any
21 conversations with your attorney, I don't want to
22 know. I'm just going off of the plea colloquy
23 between you and the Judge, where you understood
24 the charges and have been advised and apprised of
25 the charges and you still willingly, willfully

1 pled guilty to the charges. I'm taking now that
2 you're saying, you don't even know what those
3 charges were about?

4 MR. PIKE: What was the question? I
5 don't know the question on the table now.

6 Q Who was the minor?

7 A I don't know.

8 Q You were never told the name or initials
9 of that minor victim by the State Attorney's
10 Office or the prosecutor?

11 A Not that I recall.

12 Q Just so the jury understands, this
13 method of paying underage minor females to bring
14 you other underage minor females for sex, is
15 something that you do in New York, and New
16 Mexico, Florida, everywhere, not just West Palm
17 Beach; isn't that right?

18 MR. PIKE: Again, form, compound, again
19 assumes facts not in evidence.

20 Argumentative and harassing, and moreover,
21 we have already been down this road before
22 in separate related questions that have
23 already been asked and answered.

24 A I would like to respond to each one of
25 your questions; however, today my attorneys have

1 advised me I cannot and they've advised me I must
2 assert my Sixth Amendment right, my Fifth
3 Amendment right and my Fourteenth Amendment right
4 under the U.S. Constitution, therefore, that's
5 what I'm going to do.

6 Q Where is the calendar or schedule of
7 your underage sex appointments?

8 MR. PIKE: Form, speculation.

9 A You said where is...

10 MR. PIKE: "Again."

11 Q Where is the calendar or schedule that
12 [REDACTED] kept for you for your appointments
13 for sex with underage females?

14 MR. PIKE: Same objection.

15 Q If there is not one, you can tell me
16 there is not one.

17 A I would like to answer each one of your
18 questions today. However, I have been advised by
19 counsel that I must assert my Fifth Amendment,
20 Sixth Amendment and Fourteenth Amendment rights
21 under the U.S. Constitution or risk losing their
22 representation. Therefore, I'm going to have to
23 assert those constitutional rights, though I
24 would like to answer that question.

25 Q Are you still in possession of the

1 computers that were taken from your house prior
2 to the execution of the search warrant?

3 A Again. Am I still...?

4 Q Are you still in possession of the
5 computers that were removed from your house just
6 prior to the execution of the search warrant?

7 A I intend to respond to all relevant
8 questions regarding this lawsuit. However, at
9 the present time my attorneys have counseled me I
10 cannot respond to any questions that may be
11 relevant to this lawsuit, no matter how much I
12 might want to. I must accept this advice or risk
13 losing my Sixth Amendment right to
14 representation. Therefore, I must assert my
15 rights under the Fifth, Sixth and Fourteenth
16 Amendments of the U.S. Constitution.

17 Q Who is it that removed those computers
18 from your house prior to the execution of the
19 search warrant?

20 MR. PIKE: Objection, predicate.

21 A I intend to respond to all relevant
22 questions regarding this lawsuit. However, at
23 the present time my attorneys have counseled me
24 that I cannot provide answers to any questions
25 that may be relevant to this lawsuit, no matter

1 how much I would like to, and I must accept their
2 advice or risk losing their representation.
3 Accordingly, therefore, I would have to assert
4 those rights, Mr. Edwards.

5 **Q It is my understanding, through
6 information and belief, it is my understanding
7 that this computer system contained the complete
8 list of names of underage minor females with whom
9 you engaged in sexual activity; is that correct?**

10 A You're --

11 MR. PIKE: Objection.

12 A -- you're asking for my understanding?

13 **Q No --**

14 A Are you asking me to tell you what your
15 understanding is?

16 **Q Did the computers that were removed from
17 your home just prior to the execution of the
18 search warrant contain the complete list of
19 underage minor females with whom you engaged in
20 sexual activity?**

21 MR. PIKE: Form.

22 A Though I would like to answer that
23 question, like all your other questions here
24 today, unfortunately my attorneys have counseled
25 me that I'm going to have to assert my Sixth

1 Amendment, Fifth Amendment and Fourteenth
2 Amendment rights under the U.S. Constitution. I
3 point -- excuse me. I would point out that your
4 firm was described by the current U.S. Attorney
5 as a criminal enterprise involved in money
6 laundering, creating and fabricating malicious
7 cases of a sexual nature against people like me
8 and others, in order to fleece local investors
9 out of millions of dollars.

10 I believe the senior partner of that
11 firm currently sits in jail. Unfortunately
12 though I would like to answer all of your
13 questions, today my attorneys have counseled me I
14 must assert my rights under the Sixth Amendment,
15 Fourteenth Amendment and Fifth Amendment of the
16 U.S. Constitution.

17 **Q Isn't it true, you and [REDACTED] and
18 Ghislaine Maxwell and [REDACTED] operated
19 as an organized criminal enterprise designed to
20 sexually exploit minor?**

21 MR. PIKE: Objection, argumentative,
22 speculation, calls for a legal conclusion
23 and continues to assume facts not in
24 evidence.

25 A Though I would like to answer that

1 question, Mr. Edwards, like most of your other
2 questions here today... and hopefully will get to
3 do so at some point, my lawyers have advised me I
4 must today assert my constitutional rights under
5 the Sixth Amendment, Fifth Amendment and
6 Fourteenth Amendment of the U.S. Constitution and
7 I must accept their advice or risk losing
8 effective representation.

9 **Q And as part of that organization you
10 developed code terms such as "Work" or "Massage"
11 as opposed to engage in sex with minors; is that
12 true?**

13 MR. PIKE: Form, argumentative,
14 speculation, harassing, assumes facts not in
15 evidence.

16 A Can you... you...?

17 **Q You developed code terms such as you --**

18 A "You" me?

19 **Q Yes, you, would ask these girls if they
20 would like to give you a massage or work for you,
21 rather than asking them to do what was going to
22 be done, which is engage in sexual activity with
23 you; isn't that true?**

24 MR. PIKE: Same objections.

25 A Are you asking if I developed code

1 words? Is that the question?

2 **Q Right. Code words.**

3 A I would like to respond to that
4 question, but unfortunately today my attorneys
5 told me I have to respond by taking -- invoking
6 my Sixth Amendment, Fourteenth Amendment and
7 Fifth Amendment rights of the U.S. Constitution,
8 or risk losing my amendment right to effective
9 representation. Accordingly I assert my
10 Constitutional rights as guaranteed by those
11 amendments.

12 **Q What did it mean within your
13 organization when someone, some underage minor
14 female was coming over to work for you?**

15 MR. PIKE: Form.

16 A What did it mean?

17 **Q Right, what did it mean? What did it
18 mean to you was going to happen when an underage
19 minor female would either call to work or [REDACTED]
20 [REDACTED] would tell you this person was coming to
21 work for you at a specific time?**

22 MR. PIKE: Objection, vague,
23 speculative, assumes facts not in evidence.

24 A I would like to answer that question, as
25 most of your other questions today. However,

1 today my attorneys have counseled me that I must
2 invoke my Sixth Amendment, Fourteenth Amendment
3 and Fifth Amendment right, or risk -- and if I
4 don't, I risk losing them as my attorneys so,
5 therefore, I must assert those rights.

6 **Q You're laughing as if my questions are
7 ludicrous right now but you're aware that there
8 were trash pulls from your home where there were
9 message pads, messages taken by various employees
10 of yours, where these terms, "Message," "Work"
11 were used in conjunction with underage minor
12 females coming over to your house, weren't you?**

13 MR. PIKE: Same objections, form, as
14 well. Move to strike, and also assumes
15 facts not in evidence. Lack predicates.

16 **Q You're aware of the trash pull and the
17 message pads, correct?**

18 MR. PIKE: Same objections.

19 Do you have any documents with you here
20 today that you speak of?

21 MR. EDWARDS: No, but at this point in
22 time in the trial, they will already about
23 in evidence.

24 A I'm aware of a trash pull? What's a
25 "trash pull"? I'm sorry.

1 as a trash pull, just what someone takes as
2 a message at Mr. Epstein's home and --

3 A Do I know what a message pad is?

4 **Q No. In your home, do you typically have
5 your housekeeper, housemanager, or somebody else,
6 when they take a message for you, write on a
7 specific pad that informs you as to who is
8 calling, the time they are calling and the
9 purpose for their calling, and there is a carbon
10 copy sheet evidencing that message?**

11 MR. PIKE: Objection, asked and
12 answered.

13 **Q You know what I'm talking about?**

14 A I know what a message pad is.

15 **Q Do you use them commonly in your home or
16 did you back prior to your arrest?**

17 A I would like to answer that question,
18 but today my attorneys have advised me I have to
19 assert my Fifth Amendment, Sixth Amendment and
20 Fourteenth Amendment rights under the U.S.
21 Constitution, so therefore, I'm going to do that
22 or I risk losing their representation.

23 **Q Is my question to you confusing? Do you
24 know what I'm talking about?**

25 MR. PIKE: Form.

1 **Q Are you aware of -- I'll ask it of you
2 this way: When [REDACTED] would take a phone
3 message for you, what did she write it down
4 with?**

5 MR. PIKE: Form.

6 A The question makes no sense to me,
7 sorry.

8 **Q If another employee of yours were to
9 answer the telephone, be it your housekeeper,
10 housemanager, would answer the phone, take a
11 message for you and write it down so that you
12 could read it later, what would that message be
13 written on?**

14 A Most likely paper.

15 **Q Okay, is that paper typically in the
16 form of a message pad that has a carbon copy
17 sheet to the back?**

18 A No.

19 **Q You're unfamiliar with the documents
20 that I'm talking about, that being a message pad
21 that informs you as to who called, the time they
22 called and the purpose for calling?**

23 MR. PIKE: For purposes of the question
24 you're specifically talking about a message
25 pad, nothing related to what you're defining

1 A Not specifically, no.

2 **Q Okay.**

3 **The information --**

4 A Is there something you have to show me,
5 so I know what you're talking about?

6 **Q I don't have it to show you today, but
7 if the information and evidence that I have
8 learned through this process is accurate and
9 correct, it would seem a foregone conclusion that
10 you and I would be on the same page, at least
11 about this document, so --**

12 A Okay.

13 **Q -- if we are going to get to a point you
14 tell me "This document doesn't exist" or "I don't
15 know what you're talking about," okay, that's
16 fine, but that's something we can hash out.**

17 **Here is my question: When a
18 housekeeper/housemanager would take a message for
19 you from any caller, is there a specific message
20 pad that has a carbon copy located near your
21 telephone, for them to write down the name of the
22 caller, the purpose for the call and the time
23 called?**

24 MR. PIKE: Form.

25 **Q Is that something you're familiar with?**

1 A I would like to respond to that
2 question. Today my attorneys have counseled me I
3 must assert my Sixth Amendment, Fifth Amendment
4 and Fourteenth Amendment right under the U.S.
5 Constitution.

6 **Q You're invoking your Fifth Amendment
7 right is not that you understand the question.
8 You understand my question and are electing to
9 invoke your Fifth Amendment rights; is that
10 correct?**

11 A Yes.

12 **Q When [REDACTED] or a housekeeper or
13 housemanager, whoever happened to be employed at
14 the time, would take messages, what form would
15 you normally or typically receive them in?**

16 A (Witness shrugs.)

17 MR. PIKE: Same objections.

18 A I don't understand the question.

19 **Q When a caller would call the home,
20 housemanager or housekeeper or [REDACTED] I
21 don't know what you would call her, assistant,
22 would answer the phone, and take a message for
23 you so that you would know who called, what would
24 they typically write down the message on so that
25 you would have it?**

1 MR. PIKE: Objection. Object to the
2 form, lacks predicate. You have not
3 established anything here today relative to
4 a housekeeper or housemanager or the like.
5 Um... And I'm trying to understand the
6 question. But --

7 MR. EDWARDS: Really?

8 MR. PIKE: -- it lacks predicate.

9 MR. EDWARDS: This will play well.

10 A Piece of paper.

11 **Q Normally they would write it down on a
12 piece of paper and give it to you?**

13 A I didn't say that.

14 **Q Have you ever been given a message that
15 is ripped out of a message pad that has a carbon
16 copy to it?**

17 A Oh, I see. Okay. I intend -- I would
18 like to answer that question, but today my
19 attorneys have advised me I must respond by
20 invoking my Sixth Amendment right, my Fifth
21 Amendment right and my Fourteenth Amendment
22 rights under the U.S. Constitution. Though I
23 would like to answer these questions, accordingly
24 I must assert those rights or I risk losing my
25 representation here today.

1 **Q Between the years 2002 and 2005, who was
2 your house manager?**

3 A (No response.)

4 **Q If there is more than one, tell us
5 that.**

6 A The question is unclear. I'm sorry.

7 **Q Okay, let me start with between 2002 and
8 2005, did you employ a housemanager?**

9 MR. PIKE: Form.

10 A Where?

11 **Q At your Palm Beach home.**

12 A I intend to respond to all relevant
13 questions here today, Mr. Edwards. Hopefully we
14 will get some. But my attorneys have advised me
15 that today I must invoke my Sixth Amendment,
16 Fifth Amendment and Fourteenth Amendment rights
17 under the U.S. Constitution; or risk losing them
18 as counsel. So today I have to assert those
19 privileges.

20 **Q Do you know [REDACTED]**

21 A I intend to respond to all relevant
22 questions regarding this lawsuit. However, at
23 the present time no matter how much I would like
24 to answer that question, I cannot, because my
25 counsel -- the attorneys have told me that I have

1 to invoke my Sixth Amendment, Fifth Amendment and
2 Fourteenth Amendment or, in fact, risk losing
3 their representation. Therefore, I'm going to
4 have to assert my rights under those.

5 **Q [REDACTED] is a female that was born in [REDACTED]**

6 [REDACTED]

7 A Is that a question?

8 **Q Not yet. When is the first time that
9 you met her?**

10 MR. PIKE: Objection, speculation.

11 MR. EDWARDS: That assumes that he did
12 meet her; is that what you're saying?

13 MR. PIKE: Your question assumes --

14 MR. EDWARDS: He met her?

15 MR. PIKE: -- exactly what he just said
16 which hasn't been established on the record
17 yet pursuant to the appropriate Florida
18 Rules of Civil Procedure and the Evidence
19 Code. Lacks predicate.

20 A That being said, I would like to answer
21 that question, but today my attorneys have
22 counseled me that I cannot, and they've advised
23 me I must assert my Sixth Amendment right, my
24 Fourteenth Amendment right, and my Fifth
25 Amendment right under the U.S. Constitution.

1 THE WITNESS: Can you throw me one of
2 the suckey candies, please

3 Thank you.

4 MR. EDWARDS: (Handing candy.)

5 THE WITNESS: Appreciate it.

6 **Q Isn't it true you met [REDACTED] for the first**
7 **time in [REDACTED] just before her**
8 **fourteenth birthday?**

9 MR. PIKE: Same objections.

10 A You know, your firm has been accused by
11 the U.S. Attorney of perpetrating one of the
12 largest frauds in South Florida history by
13 crafting sexually charged lawsuits against people
14 like me and others in order to fleece
15 unsuspecting investors here in South Florida out
16 of millions of dollars. The firm of you and Mr.
17 Jaffe. The U.S. Attorney described it as bogus
18 schemes contrived by your firm.

19 I would like to answer every one of your
20 questions here today; however, my attorneys have
21 counseled me that I may not, and have advised me
22 that I have to invoke my Sixth Amendment, Fifth
23 Amendment and Fourteenth Amendment rights under
24 the U.S. Constitution. Therefore, that's what I
25 will do, otherwise I risk losing their

1 A And now the question?

2 **Q You know who she is, correct?**

3 MR. PIKE: Form.

4 A I would like to answer that question
5 here, Mr. Edwards, but unfortunately today my
6 attorneys have counseled me I must invoke my
7 Fifth Amendment, Sixth Amendment and Fourteenth
8 Amendment rights under the U.S. Constitution, and
9 if I don't, I risk losing their representation,
10 therefore I must assert those rights.

11 **Q When I asked you about [REDACTED] or [REDACTED]**
12 **[REDACTED], you sat there for a while thinking hard**
13 **about whether or not you knew them. Do you**
14 **remember either [REDACTED] or [REDACTED]?**

15 MR. PIKE: I move to strike counsel's
16 statement because the statement as worded
17 assumes facts certainly not in evidence. It
18 is argumentative, speculates as to what is
19 "thinking hard," and, counsel, I don't
20 understand the question on the table,
21 combined with your narrative. If you could
22 repeat the question?

23 MR. EDWARDS: Sure.

24 **Q I'm asking if during this questioning**
25 **process, has it refreshed your recollection as to**

1 representation.

2 **Q Isn't it true [REDACTED] as a 13 or 14-year**
3 **old girl was taken to your house by another**
4 **underage minor female, that being [REDACTED]**
5 **[REDACTED]**

6 MR. PIKE: Form.

7 THE WITNESS: Tissue, please.

8 MR. EDWARDS: (Handing tissue.)

9 A I would like to answer that question
10 like all the other questions you've asked me here
11 today, but today my attorneys have counseled me
12 that I have to invoke my Sixth Amendment right,
13 my Fifth Amendment right and Fourteenth Amendment
14 rights under the U.S. Constitution; therefore
15 that's what I will do.

16 **Q Do you know who [REDACTED] is,**
17 **right, she had a lawsuit against you previously?**

18 MR. PIKE: Form.

19 A Again the last name?

20 **Q [REDACTED]**

21 A Could you spell it for me?

22 **Q Well, the pseudonym that she used in her**
23 **lawsuit against you alleging similar facts to**
24 **those alleged in [REDACTED] versus Jeffrey Epstein was**
25 **[REDACTED] versus Jeffrey Epstein.**

1 **who [REDACTED] is or do you really have no idea who**
2 **that is?**

3 MR. PIKE: Form. Asked and answered.

4 **Q Do you remember [REDACTED]?**

5 A Are you going to ask one question?
6 Which question would you like answered first?

7 **Q Do you remember [REDACTED]?**

8 A I would like to answer that question. I
9 would like to answer that question today; however
10 my attorneys today have advised me that I must
11 assert my Fourteenth Amendment, Fifth Amendment
12 and Sixth Amendment rights under the U.S.
13 Constitution, no matter how much I would like to
14 answer these questions. So unfortunately, I'm
15 going to assert those rights.

16 **Q When you first met [REDACTED], isn't it true**
17 **that she was just about to begin her ninth grade**
18 **year in high school?**

19 MR. PIKE: Same objections. Form.

20 A I believe her testimony in front of the
21 FBI, in a sworn deposition says something else,
22 but I don't recall exactly what. I don't have
23 any recollection.

24 **Q Of [REDACTED]**

25 MR. PIKE: Form.

1 A You asked the question when I met her, I
2 think, if I met her.

3 Q You have no recollection as to when you
4 met her?

5 A I don't have recollection if I ever met
6 her. I just told you, I did read her FBI
7 statement, so I know what she has said and it is
8 not what you've just represented to me.

9 Q Your only knowledge of any interaction
10 you may have had with [REDACTED] is derived from an FBI
11 statement that she gave; is that true?

12 A I believe what you just represented she
13 said was not what she had sworn to.

14 Q I'm not asking what she said. I'm
15 asking do you independently remember if she was
16 entering into her ninth grade year of high school
17 when you met her? Independent of anything you've
18 read.

19 MR. PIKE: All right, let me just move
20 to strike the... Diatribe between Mr.
21 Edwards and Mr. Epstein. I'm confused as to
22 what question is on the table now.

23 MR. EDWARDS: Okay.

24 Q Independent of anything you've ever
25 read --

1 Q When you first came into the room today,
2 didn't you look at me and say "I like [REDACTED]" Isn't
3 that the statement that you made to me?

4 MR. PIKE: Form. Move to strike.

5 A I don't believe I said that.

6 Q What is it that you believe you did say
7 referencing [REDACTED] when you sat down in that seat
8 prior to the cameras rolling?

9 MR. PIKE: Form. Counsel, I was here
10 during that whole time and I don't recall
11 any such statement.

12 MR. EDWARDS: You weren't in the room.

13 A I don't remember. I don't know.
14 Sorry.

15 Q So is it your testimony right now that
16 you did not say to me "I like [REDACTED]"?

17 A That's --

18 MR. PIKE: Objection.

19 A -- that's correct.

20 Q Do you like [REDACTED]?

21 MR. PIKE: Form, predicate, and
22 relevance.

23 A I would like to answer all your
24 questions here as I've... tried to do my best,
25 however, my attorneys have advised me that I must

1 A Okay.

2 Q -- do you remember meeting [REDACTED], just
3 before she entered into her ninth grade year in
4 high school?

5 A I would like to answer that question,
6 however my attorneys today have advised me that
7 though her own statements are contradictory to
8 what you just said, her sworn statements to the
9 FBI contradict what you just said. I have to
10 invoke my Sixth Amendment, Fifth Amendment and
11 Fourteenth Amendment rights to the U.S.
12 Constitution.

13 Q Just a few minutes ago when you asked
14 when you met her, you said, "I don't know if I've
15 ever met her," so is that your testimony, that
16 you don't know if you ever met [REDACTED]?

17 A My testimony is very clear. I must
18 assert the rights my attorneys have asked me to
19 assert today, though her testimony under oath to
20 the FBI is not what you represented it to be, to
21 me, and the ladies and gentlemen of the jury who
22 are watching this, hopefully.

23 MR. PIKE: Form.

24 Q We will get into that.

25 A Okay.

1 assert my Sixth Amendment, Fourteenth Amendment
2 and Fifth Amendment rights under the U.S.
3 Constitution.

4 Q When you first met [REDACTED], isn't it true
5 that you knew she was an economically
6 disadvantaged girl that needed money?

7 MR. PIKE: Objection, speculation,
8 assumes facts not in evidence, and it is
9 argumentative as worded.

10 A I would like to answer all your
11 questions here today, Mr. Edwards, and Mr.
12 Jaffe. However, on advice of counsel I have to
13 assert my Sixth Amendment, Fifth Amendment and
14 Fourteenth Amendment rights under the U.S.
15 Constitution, or risk losing my right to
16 effective representation. So accordingly I must
17 assert those rights as guaranteed by the Sixth,
18 Fifth and Fourteenth amendments.

19 Q When she was a 14-year old girl, she was
20 taken into your bedroom and you ordered her to
21 take her clothes off; is that correct?

22 MR. PIKE: Objection, vague, confusing.

23 As to "her," I'm not quite sure who you...

24 Q When [REDACTED] was a 14-year old girl, she
25 was taken up to your bedroom and you ordered her

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1 **to take her clothes off; isn't that true?**
2 MR. PIKE: Objection, speculation, and
3 assumes facts not in evidence. Lacks
4 predicate.
5 A Though once again what you've just
6 represented to me is a total contradiction to the
7 FBI sworn statement that I read of [REDACTED]. I must
8 unfortunately respond by asserting the rights
9 demanded by my attorneys today, which is my Sixth
10 Amendment, Fifth Amendment and Fourteenth
11 Amendment right against -- sorry, given by the
12 U.S. Constitution, though her testimony is
13 exactly -- does not purport in any way to what
14 you've just said.
15 **Q And when [REDACTED] was 14 years old, you**
16 **ordered she begin to give you a massage while she**
17 **was naked and you were naked; isn't that true?**
18 MR. PIKE: Same objections.
19 A Sorry, you have to repeat the question
20 for me.
21 **Q When [REDACTED] was a 14-year old girl --**
22 A Right. Yes?
23 **Q -- you laughed and said, "right" about**
24 **what?**
25 A I didn't hear the first part of your

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1 question. Now I understood it.
2 **Q When [REDACTED] was a 14-year old girl, wasn't**
3 **it true that you received a massage from her**
4 **while she was naked and you were naked?**
5 MR. PIKE: Objection, speculation,
6 assumes facts not in evidence, lacks
7 predicate.
8 A I understand that your firm has been
9 accused by the U.S. Attorney of South Florida,
10 perpetrating one of the largest frauds in
11 Florida's history, by crafting malicious,
12 sexually charged allegations against people like
13 me. I understand [REDACTED] testimony is not what
14 you've just described, though she swore to the
15 FBI... under oath. Though I would like to answer
16 your questions here today, my attorneys have
17 advised me I may not. I must assert my Sixth,
18 Fifth and Fourteenth Amendment rights under the
19 U.S. Constitution or risk losing their
20 representation.
21 THE WITNESS: Restroom break.
22 MR. EDWARDS: Excuse me?
23 THE WITNESS: Restroom break.
24 MR. EDWARDS: Stopping again?
25 THE WITNESS: Yeah.

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1 THE VIDEOGRAPHER: Going off the video
2 record 1:49 p.m.
3 THE WITNESS: Thank you.
4 (Pause in the proceedings.)
5 THE VIDEOGRAPHER: Back on the video
6 record 2:04 p.m.
7 **Q Mr. Epstein, when [REDACTED] was a 14-year old**
8 **girl, isn't it true that while you were naked on**
9 **the massage table, you ordered [REDACTED] to take off**
10 **her clothes and provide you a massage?**
11 A I believe I've answered that question,
12 didn't I?
13 **Q I don't remember where we left off,**
14 **that's why.**
15 MR. PIKE: Form, argumentative,
16 speculation. It is compound and assumes
17 facts not in evidence and has been asked and
18 answered. But we did take a break, so you
19 can respond.
20 (Counsel addressing Mr. Epstein.)
21 A The current U.S. Attorney has described
22 your law firm as a criminal enterprise involved
23 in fabricating sexually charged cases against
24 people like me in order to fleece unsuspecting
25 investors out of millions of dollars. He used

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1 words like "bogus schemes."
2 Unfortunately at this time in response
3 to your questions, though I would like to answer
4 each and every one, I'm going to have to, on
5 advice of counsel, assert my Sixth Amendment,
6 Fifth Amendment and Fourteenth Amendment rights
7 under the U.S. Constitution, though I would like
8 to answer those questions.
9 **Q While [REDACTED] was a naked 14-year old girl**
10 **providing you a massage, you ordered her to pinch**
11 **your nipples during that massage; isn't that**
12 **true?**
13 MR. PIKE: Same objections,
14 argumentative, speculation, harassing,
15 assumes facts not in evidence and lacks
16 predicate.
17 A I asked her to pinch her nipples?
18 **Q Pinch your nipples?**
19 A I believe her own sworn testimony
20 contradicts that statement. However, I would
21 like to answer all your questions here today, but
22 my attorneys advised me, at least today, Mr.
23 Edwards, I must take my constitutional privileges
24 of the Sixth Amendment, Fifth Amendment and
25 Fourteenth Amendment, keeping in mind that your

1 firm, of you, Mr. Edwards, and Mr. Jaffe's firm
2 has been accused by the U.S. Attorney of
3 perpetrating one of the largest frauds in
4 Florida's history by crafting sexually charged
5 lawsuits against people like me, to fleece from
6 local people millions of dollars.

7 **Q And during this massage by [REDACTED], you
8 began to masturbate in front of her; isn't that
9 true?**

10 MR. PIKE: Same objections?

11 A Unfortunately, though I would like to
12 answer each one of your questions here today, my
13 attorneys have counseled me today at least, I
14 have to assert my Fifth Amendment, Sixth
15 Amendment and Fourteenth Amendment rights under
16 the U.S. Constitution, otherwise I risk losing
17 their effective representation, and the fact that
18 your firm has been accused of fabricating these
19 malicious lawsuits to fleece investors out of
20 millions of dollars, as described by the U.S.
21 Attorney here in South Florida as a criminal
22 enterprise involved in mail fraud, money
23 laundering... Unfortunately I would like to
24 answer each question, but I can't today.

25 **Q Isn't it true that while you were**

1 **masturbating you inserted your fingers into her
2 14-year old vagina?**

3 MR. PIKE: Objection, argumentative.
4 Speculation. It is harassing. It assumes
5 facts not in evidence. The question
6 continues to lack predicate, and I also
7 believe the question has been asked and
8 answered sometime ago.

9 A Though I would like to answer each one
10 of your questions today, Mr. Edwards, my counsel
11 has told me I cannot answer any questions that
12 may be relevant to this lawsuit. The fact that
13 your firm has been accused of major fraud, the
14 largest fraud in South Florida history, by the
15 U.S. Attorney calling your firm a criminal
16 enterprise involved in money laundering -- I
17 believe it is racketeering, but I could be
18 wrong... Monetary transactions via fraud, mail
19 fraud, conspiracy -- sorry -- I would like to
20 answer your questions but today on advice of
21 counsel, I am going to have to assert my rights.

22 **Q Isn't it true also that while [REDACTED] was a
23 14-year old female, you masturbated to the point
24 of ejaculating while inserting your fingers into
25 [REDACTED] vagina?**

1 MR. PIKE: Same objections incorporated?

2 A Again, the question?

3 **Q Isn't it true that during this sexual
4 massage, while you were -- that you masturbated
5 to the point of ejaculating while you were
6 inserting your fingers into [REDACTED] vagina?**

7 MR. PIKE: Objection, argumentative,
8 speculation. It is compound. It is vague.
9 It assumes facts not in evidence and lacks
10 predicate.

11 A Though I would like to answer that
12 question with specificity and detail today, no
13 matter how much I would like to, my attorneys
14 have advised me I cannot. They advised me I must
15 assert my Fifth Amendment, Sixth Amendment and
16 Fourteenth Amendment rights under the U.S.
17 Constitution or potentially lose effective
18 representation, so therefore, I will assert those
19 rights.

20 **Q Isn't it true that the ritual that I'm
21 describing occurred with [REDACTED] approximately 100
22 times when she was between the ages of 13 and 16?**

23 MR. PIKE: Same objections, with the
24 additional objection of vague and
25 confusing.

1 A Since your firm has been involved --
2 according to the U.S. Attorney in crafting these
3 fraudulent lawsuits in order to fleece local
4 investors, and the fact that I believe in L.M.'s
5 sworn statements, that's what you've just alleged
6 at least is totally contradicted by your client's
7 own sworn statements, though I would like to
8 answer these questions today, my attorneys have
9 advised me I may not and advised me I must assert
10 my Fifth, Sixth and Fourteenth Amendment rights
11 under the U.S. Constitution or potentially risk
12 losing effective representation.

13 **Q In addition to the sexual abuse directed
14 against [REDACTED] that I've just described, isn't it
15 true that you also paid her money to bring you
16 more than 50 other underage minor females for you
17 to similarly abuse?**

18 MR. PIKE: Same objections.

19 A Though I believe in her own sworn
20 testimony to the U.S. government that she
21 contradicts those assertions, and I'm sure maybe
22 you'll have some explanation at trial, but the
23 ladies and gentlemen of the jury should know
24 about your firm being accused by the U.S.
25 Attorney of perpetrating one of the largest

1 frauds in U.S. history by crafting malicious
2 lawsuits of a sexual nature in order to fleece
3 investors out of millions of dollars, local
4 investors; and though I would like to answer your
5 questions in detail today, Mr. Edwards, and Mr.
6 Jaffe, my counsel says I may not and have asked
7 me to assert those rights, which I must
8 unfortunately.

9 **Q You keep bringing up this fraud of the**
10 **former law firm known as Rothstein, Rosenfeld,**
11 **Adler in response to my questions, so I would**
12 **like you to tell the jury at this time which**
13 **allegation are you now saying is fraudulent or**
14 **untrue, that's been made by [REDACTED]?**

15 MR. PIKE: Form, confusing, compound,
16 and irrelevant.

17 MR. EDWARDS: Only made irrelevant by
18 his answers.

19 MR. PIKE: Same objections.

20 **Q Do you understand the question?**

21 A No.

22 **Q You made reference to -- in response to**
23 **my questions about what you did sexually to**
24 **[REDACTED].**

25 A Yes, sir?

1 described as one of the largest frauds in South
2 Florida's history. So, it concerns me. It is a
3 factor in the way I'm thinking about answering.
4 Sorry.

5 **Q Each time that you digitally penetrated**
6 **[REDACTED] or otherwise fondled her sexually, you paid**
7 **her \$200; is that correct?**

8 MR. PIKE: Objection, argumentative,
9 speculative, harassing. It assumes facts
10 not in evidence, and with regard to this
11 line of questioning, the Court has already
12 ruled that the demeanor in which you're
13 presenting this question is improper, and
14 harassing, so if you would --

15 MR. EDWARDS: I'm very comfortable with
16 the demeanor right now, Mr. Pike. These are
17 just the facts of the lawsuit. The facts
18 are outrageous and I understand that, but
19 they have to be asked.

20 MR. PIKE: Maybe the demeanor and tone
21 of your question is laced in a manner that
22 it is proper for the video, but the content
23 of the question is the same exact harassing
24 question that was deemed by the Judge to be
25 argumentative. I'm not saying that he's not

1 **Q -- you have responded with these fraud**
2 **allegations against the firm of Rothstein,**
3 **Rosenfeld, Adler. I want you to tell the jury**
4 **which allegations that [REDACTED] is making against you**
5 **are you disputing at this time or calling a fraud**
6 **or calling untrue?**

7 MR. PIKE: Confusing, compound and -- if
8 the court reporter would read back Mr.
9 Epstein's response, I think you will see the
10 way you just phrased the question
11 mischaracterizes his testimony. Because --
12 well, I'll keep it there unless you want me
13 to go further. You want me to go further?

14 MR. EDWARDS: No, I want him to go
15 further.

16 MR. PIKE: Mischaracterizes the
17 witness's testimony.

18 A [REDACTED] own statements contradict every
19 one of your allegations that you've made to me
20 today, as a hypothetical. In her own words. And
21 you -- and the potential reasons this concerns me
22 is the fact that the law firm that represented
23 [REDACTED] and two others have been accused by the U.S.
24 Attorney of fraudulently producing cases against
25 me and others, to fleece investors in what he's

1 going to answer your question.

2 MR. EDWARDS: Okay.

3 MR. PIKE: Or that you don't know what
4 his answer will be, but what I'm saying is:
5 could you rephrase the question?

6 **Q Answer that question. I'll work on**
7 **rephrasing it for you at some point.**

8 A Sorry, I forgot what the question is by
9 now.

10 **Q Isn't it true that each time that you**
11 **interacted with [REDACTED] sexually, meaning digitally**
12 **penetrated her or fondled her in some other way,**
13 **that you paid her \$200 each time?**

14 MR. PIKE: Form.

15 THE WITNESS: Sorry?

16 MR. PIKE: Form. Go ahead.

17 A I would like to answer each one of your
18 questions here today. However, my attorneys have
19 counseled me that today I have to assert my Fifth
20 Amendment, Sixth Amendment and Fourteenth
21 Amendment rights under the U.S. Constitution and
22 I'm cognizant of the fact that your firm has
23 crafted these malicious lawsuits, it has been
24 reported that the lawsuits are of a sexual
25 nature, in order to fleece investors, so though I

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1 would like to answer those questions, Mr.
2 Edwards, and Mr. Jaffe, today I must keep my
3 counsel's advice.

4 **Q Isn't it true that for each underage**
5 **minor that [REDACTED] brought to you for the purposes**
6 **of you engaging in sexual activity, you paid her**
7 **\$200?**

8 MR. PIKE: Objection, speculation.
9 Compound question, and it assumes facts not
10 in evidence. Therefore lacks predicate.

11 A Though I would like to answer that
12 question, as most of your other questions here
13 today, Mr. Edwards, I intend to respond,
14 hopefully at some point to all of your questions,
15 but today my attorneys have advised me I must
16 invoke my Sixth Amendment, Fifth Amendment and
17 Fourteenth Amendment right under the U.S.
18 Constitution.

19 **Q Over the course of relatively a roughly**
20 **three years, isn't it true that you touched or**
21 **fondled [REDACTED] in a sexual manner on more than 50**
22 **occasions?**

23 MR. PIKE: Objection, argumentative.
24 Calls for speculation. It is overbroad,
25 confusing and vague, and it assumes facts

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1 not in evidence.

2 A Could you repeat the question for me?
3 I'm sorry, Mr. Edwards.

4 **Q Yes. The three-year period between [REDACTED]**
5 **[REDACTED] when you were engaging in sexual conduct**
6 **with [REDACTED], isn't it true that that conduct took**
7 **place on more than 50 occasions?**

8 MR. PIKE: Same objections.

9 A I believe if you read your own client's
10 FBI statements, what her statement -- it changed
11 dramatically after she decided to file a
12 different lawsuit, at the request of you and your
13 firm, with one of your firms -- there have been
14 many firms it seems, was accused of major fraud.
15 Since the testimony has changed dramatically, I
16 would like to answer those questions, but today
17 my attorneys have advised me I must assert my
18 Sixth Amendment right, my Fifth Amendment right
19 and my Fourteenth Amendment right.

20 **Q ** Your answers are not going to**
21 **incriminate you if the answer is "no," it is only**
22 **if the answer is "yes" that it will incriminate**
23 **you, so aren't you telling the jury every single**
24 **thing I've asked you is not part of a fraud, just**
25 **happens to be true, isn't it?**

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1 MR. PIKE: Objection, argumentative,
2 irrelevant and move to strike. I'm simply
3 going to instruct the witness not to answer
4 that question because... I don't understand
5 it. I don't know what to say about that
6 question.

7 A (Gesturing.)

8 **Q All of the things that I've told you or**
9 **that I've asked you about, you touching her while**
10 **she was underage, you paying her for sexual**
11 **conduct, those are all things that really**
12 **happened, there is nothing about that, that**
13 **anybody has fabricated or made up, is there?**

14 MR. PIKE: Objection, argumentative,
15 speculative, it assumes facts not in
16 evidence, it certainly mischaracterizes the
17 witness's testimony all day, since I have
18 been here, and I have been here the whole
19 time. It assumes facts not in evidence. It
20 is also overbroad and substantially compound
21 because you're attempting to incorporate all
22 of your questions today into one question.

23 MR. EDWARDS: I think you know, Mr.
24 Pike, your objection should be limited to
25 the form. If you object to the form, it is

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1 fine.

2 MR. PIKE: I'm sorry, that's --

3 MR. EDWARDS: You --

4 MR. PIKE: You've asked me several times
5 today to tell you why. I thought I was
6 helping. I'm sorry. I certainly will keep
7 objecting to --

8 MR. EDWARDS: Appreciate it.

9 MR. PIKE: -- the form.

10 MR. EDWARDS: Thank you.

11 **Q And your answer is?**

12 A Repeat the question.

13 **Q Every single allegation that [REDACTED] has**
14 **made and I have now questioned you about in terms**
15 **of your sexual involvement with [REDACTED] they are**
16 **all true; isn't that correct? There is nothing**
17 **fabricated about any of these allegations,**
18 **correct?**

19 MR. PIKE: Objection, argumentative,
20 speculative, compound. It is vague,
21 overbroad --

22 MR. EDWARDS: You're objecting to form?

23 MR. PIKE: Yes, assumes facts not in
24 evidence and lacks predicate. That is
25 form.

1 A And I would like to answer that question
2 specifically today, however, on advice of counsel
3 they've suggested I take the Sixth amendment --
4 assert my Sixth Amendment, Fifth Amendment and
5 Fourteenth Amendment rights under the U.S.
6 Constitution, keeping well aware of your firm's
7 responsibility in the largest fraud in Florida's
8 history by crafting sexually charged lawsuits
9 against people like me and others.

10 I believe in addition, since her
11 allegations, as you've phrased them, have changed
12 dramatically since her sworn statement, until in
13 fact, after she joined this firm charged with
14 this major fraud and most of her statements have
15 changed, I believe, so...

16 Q You remember when [REDACTED] became pregnant
17 when she was [REDACTED] years old, don't you?

18 MR. PIKE: Form, relevance, move to
19 strike?

20 A I would like to answer each one of your
21 questions here today, Mr. Edwards; each and every
22 one of your questions. However, today my counsel
23 has told me I must assert my Sixth Amendment,
24 Fourteenth Amendment and Fifth Amendment rights
25 under the U.S. Constitution.

1 MR. EDWARDS: It is not a responsive
2 answer so I won't allow --

3 MR. PIKE: That --

4 MR. EDWARDS: We'll move to strike it.
5 Let's have an answer to the question.

6 MR. PIKE: The witness is trying. If
7 there is a legal basis for your moving to
8 strike, it would be taken up with the Court
9 and you can move to strike.

10 You can continue.

11 MR. EDWARDS: Strike it, it is
12 nonresponsive?

13 A Your allegations that you keep throwing
14 at me, relate to the fact that [REDACTED] testimony,
15 after giving a sworn statement to the FBI,
16 changed dramatically after she decided to file a
17 lawsuit for money, joining your firm that's been
18 accused by the U.S. Attorney of one of the
19 largest frauds in Florida's history. I would
20 like to answer those questions; however, on
21 advice of counsel today I must assert my Fifth
22 Amendment, Sixth Amendment and Fourteenth
23 Amendment rights under the U.S. Constitution.

24 Q When [REDACTED] was a pregnant [REDACTED] year-old,
25 she brought you at least ten underage minor

1 Q Isn't it true that when [REDACTED] was 14
2 years old, 15 years old and 16 years old, you
3 touched her genitals?

4 A Separate from the fact that in her own
5 testimony, her own sworn testimony under oath
6 before she decided to file a lawsuit for money,
7 there was never any discussion about anything
8 like that. I would like to answer that question,
9 but my attorneys have advised me, at least today,
10 that I must assert my Sixth Amendment, Fifth
11 Amendment and Fourteenth Amendment rights under
12 the U.S. Constitution.

13 Q Isn't it true when she became pregnant
14 at age [REDACTED] you no longer interacted with her
15 sexually but still demanded that she bring you
16 other underage minor females for you to sexually
17 exploit?

18 MR. PIKE: Objection, speculation.

19 Compound. Harassing, and assumes facts not
20 in evidence.

21 A I believe her testimony changed
22 dramatically from her sworn statements to the
23 FBI --

24 Q That's not a responsive --

25 MR. PIKE: Excuse me --

1 females during her pregnancy; isn't that true?

2 MR. PIKE: Objection, argumentative,
3 speculation. It is vague and assumes facts
4 not in evidence and lacks predicate.

5 A I -- I -- I unfortunately would like to
6 answer that question as well as every other
7 question you've asked me here today, but my
8 attorneys have advised my I must assert my Fifth
9 Amendment, Sixth Amendment and Fourteenth
10 Amendment rights under the U.S. Constitution.

11 Q After [REDACTED] had her son at [REDACTED] years old,
12 and you were being criminally investigated for
13 some of the conduct that we've discussed here
14 today; isn't it true that you personally hired
15 and retained and paid for an attorney to
16 represent [REDACTED]?

17 MR. PIKE: Objection, speculation --

18 MR. EDWARDS: Object to the form, Mr.
19 Pike.

20 MR. PIKE: I will not. I am allowed to
21 assert the basis for my objections, I am not
22 limited to just saying "form." I'm able to
23 assert the basis as to why, so I don't waive
24 that basis.

25 MR. EDWARDS: It is just more of this

1 obstructionist --
 2 MR. PIKE: It's not obstructionist, it
 3 is objecting to form. What is
 4 obstructionist is what we are doing now. I
 5 will be finished within four seconds. So I
 6 am going to object to form, it's
 7 argumentative, speculative and it assumes
 8 facts not in evidence and it lacks
 9 predicate. That's it.
 10 A I'm sorry. (Witness shrugs.) Again?
 11 **Q The response to the question.**
 12 A I don't know the question.
 13 **Q You don't remember the question? Did**
 14 **you hire [REDACTED] an attorney at some point in time?**
 15 **Do you remember that?**
 16 MR. PIKE: Same objection.
 17 A Not to the best of my recollection.
 18 **Q Do you know [REDACTED]?**
 19 A ... Do I know James Eisenberg? I don't
 20 believe I've ever met James Eisenberg.
 21 **Q Is it your testimony today then that you**
 22 **never paid for an attorney to represent [REDACTED]?**
 23 A (Witness shakes head.)... On advice of
 24 my counsel, I would like to answer that question,
 25 but on advice of counsel I'm going to have to

1 assert my Sixth Amendment, Fourteenth Amendment
 2 and Fifth Amendment rights against -- excuse me,
 3 Sixth Amendment rights of the U.S. Constitution.
 4 **Q And that attorney that was paid for by**
 5 **you, informed [REDACTED] that if she were to tell the**
 6 **FBI exactly what happened at your house, that her**
 7 **son could be taken from her. You're aware of**
 8 **that, correct?**
 9 MR. PIKE: Same objections.
 10 A I recognize, I believe she made one of
 11 the statements at her deposition after she
 12 decided to sue me for a bunch of money and your
 13 firm has represented a number of... cases of a
 14 sexually charged nature that turned out to be
 15 fraudulent in order to fleece local investors.
 16 The U.S. Attorney described your firm and these
 17 cases as a bogus scheme, and I'm aware of that,
 18 and would like to answer your question in more
 19 detail today, Mr. Edwards; however my attorneys
 20 advised me that at least today, I must assert my
 21 rights under the Sixth Amendment, Fourteenth
 22 Amendment and Fifth Amendment.
 23 MR. PIKE: It is the food.
 24 MR. JAFFE: I didn't want him in the
 25 room in mid answer.

1 THE WITNESS: Ready? Thank you.
 2 THE VIDEOGRAPHER: Going off the video
 3 record 2:29 p.m.
 4 (Pause in the proceedings.)
 5 THE VIDEOGRAPHER: Back on the video
 6 record 2:50 p.m.
 7 **Q Isn't it true, Mr. Epstein, that you**
 8 **gave [REDACTED] money to coerce her into interacting**
 9 **with you sexually?**
 10 A Mr. Edwards, I would like to answer each
 11 and every one of your questions here today, but
 12 unfortunately, like I've done with mostly all of
 13 your other questions, I'm going to have to assert
 14 my rights, Sixth Amendment, Fourteenth Amendment
 15 and Fifth Amendment on advice of counsel.
 16 Although I would like to answer, if I don't
 17 follow my counsel's advice, I risk losing
 18 representation.
 19 **Q While committing these sexual acts**
 20 **against [REDACTED] when she was just a minor, you knew**
 21 **it would psychologically damage her; isn't that**
 22 **true?**
 23 MR. PIKE: Form, lacks predicate,
 24 speculation.
 25 A I intend to respond at some point to --

1 I would like to respond to each and every one of
 2 your questions, but today on advice of my counsel
 3 they've required me to assert my Fifth Amendment,
 4 Sixth Amendment and Fourteenth Amendment rights
 5 under the U.S. Constitution, though I would like
 6 to answer each of these questions.
 7 **Q In fact, you deliberately and**
 8 **intentionally caused severe emotional distress**
 9 **to underage minor females, including [REDACTED]; isn't**
 10 **that true?**
 11 MR. PIKE: Objection, argumentative,
 12 speculation, it is compound. And it assumes
 13 facts not in evidence.
 14 MR. EDWARDS: Okay.
 15 A I would like to answer that question, as
 16 I would like to answer all of your other
 17 questions today regarding [REDACTED]. However, my
 18 attorneys today have advised me that I must
 19 assert my Sixth Amendment right to effective
 20 representation and my Fifth Amendment right and
 21 my Fourteenth Amendment right. Though I would
 22 like to answer that with specificity, I must
 23 follow my attorney's advice.
 24 **Q Will you admit for the jury that you**
 25 **were investigated federally for your illegal**

1 activities with underage minors?

2 MR. PIKE: Same objections.

3 A I would like to answer that question, as
4 well as all the other questions you've asked me
5 here today, especially since your firm has been
6 accused by the federal, I guess, the federal
7 government,... being considered a criminal -- you
8 firm has been considered and investigated as
9 being a criminal enterprise using sexually
10 fabricated, sexual cases... fabricated cases, to
11 fleece investors out of millions of dollars, but
12 I would like to answer your questions; however my
13 attorneys have demanded that I assert my rights
14 under the Sixth Amendment, Fifth Amendment and
15 Fourteenth Amendment.

16 Q In fact, as a result of that
17 investigation, you, as well as the United States
18 Attorney's Office entered into what has now been
19 known and referred to as the nonprosecution
20 agreement; isn't that correct?

21 MR. PIKE: Same objection. The document
22 speaks for itself?

23 A You have to repeat the question.

24 Q As a result of the criminal
25 investigation into your activities with minor

1 Graff or [REDACTED] Can you explain to
2 the jury what each of those four individuals did
3 for you or conspired with you to do?

4 MR. PIKE: Object to the form of the
5 question?

6 A I would like to answer that question,
7 however, today my attorneys advise me that I must
8 assert my Sixth Amendment, Fifth Amendment and
9 Fourteenth Amendment rights under the U.S.
10 Constitution.

11 Q Isn't it fair to say that you, as well
12 as the co-conspirators, operated as an organized
13 criminal enterprise designed to sexually exploit
14 underage minors?

15 MR. PIKE: Object to argumentative,
16 speculation. It is vague and it assumes
17 facts not in evidence.

18 A Are you suggesting it was a criminal
19 enterprise? Is that the words?

20 Q Yes.

21 A Though I would like to answer that
22 question today, I think the only criminal
23 enterprise that I have been reading about today
24 was your firm, that's been accused of being a
25 criminal enterprise involved in defrauding

1 females, you reached a resolution with the United
2 States Attorney's Office, in what has now been
3 described as the nonprosecution agreement; is
4 that correct?

5 MR. PIKE: I'm going to object. Vague,
6 confusing, misrepresents the agreement and
7 the document is the best evidence. Will you
8 mark it?

9 MR. EDWARDS: I can mark it. We will
10 copy it at the end and mark it as Exhibit 2.

11 (Document, Nonprosecution Agreement, was
12 deemed marked as Exhibit number 2 for
13 identification, as of this date.)

14 A Yes.

15 Q In that agreement, there are listed
16 co-conspirators of Jeffrey Epstein, those being
17 [REDACTED] Leslie Graff
18 (phonetic) and [REDACTED]. Can you explain
19 to the jury what those individuals did for you
20 related to the crimes that were investigated by
21 the federal government?

22 A Co-conspirators?

23 Q Yes, it says "criminal charges against
24 any co-conspirators of Epstein including but not
25 limited to [REDACTED] Leslie

1 people, using mail fraud, wire fraud, money
2 laundering, the operation of the enterprise --
3 this is by the U.S. Attorney (indicating), but
4 though I would like to answer your questions with
5 specificity today, on advice of counsel, though I
6 would like to answer it, they demanded I assert
7 my Sixth Amendment, Fourteenth Amendment and
8 Fifth Amendment right or I risk losing their
9 representation.

10 Q Did you care about any of the underage
11 minor females at the time when you were engaging
12 in sexual conduct with them?

13 MR. PIKE: Objection, argumentative.
14 Harassing, already been ruled upon by the
15 Court relative to this exact question.

16 MR. EDWARDS: I feel comfortable with
17 the question. It goes to punitive damages.
18 The issue related to the Court was a
19 repetitive question on that topic or around
20 that general subject matter. I'm just
21 asking for Mr. Epstein to tell the jury how
22 he felt about these girls, whether he cared
23 about them, when he was engaging in illegal
24 sexual conduct with them.

25 MR. PIKE: Counsel, I'm going to

1 instruct him not to answer the question.
 2 You can certify it to the Court, if you
 3 like. You know what the answer is going to
 4 be; however you're attempting to lace this
 5 video. You know the Court has already
 6 ordered that these types of questions are
 7 not permitted because they are argumentative
 8 and harassing. In fact, other questions
 9 bordered but this question is on exact point
 10 with the Court's order. If you want to
 11 withdraw the question, that's fine.

12 MR. EDWARDS: I don't want to withdraw
 13 the question.

14 MR. PIKE: Then I instruct him not to
 15 answer.

16 MR. EDWARDS: Mark that somehow, that
 17 page, so we can find it in the record,
 18 relative to the hearing that will be had on
 19 that question and others similar.

20 **Q At the time when you were engaging in**
 21 **sexual conduct with underage females, you knew**
 22 **that exposing them to this, was not beneficial or**
 23 **good for these girls; isn't that true?**

24 MR. PIKE: Objection, argumentative,
 25 speculation, assumes facts not in evidence.

1 question; however, today my attorneys have
 2 advised me I must take -- assert my rights under
 3 the Fourteenth, Sixth and Fifth Amendments of the
 4 U.S. Constitution, or else I risk losing their
 5 representation.

6 MR. PIKE: And Mr. Edwards, just so we
 7 don't have to come back on the question that
 8 I instructed him not to answer, if you would
 9 go ahead and repeat that question, I will be
 10 more than happy to let him respond.

11 MR. EDWARDS: I don't remember the
 12 question we will take it up with the Court
 13 and we'll get a ruling on it.

14 MR. PIKE: It was whether or not he
 15 cared about these -- I believe you quoted it
 16 as underage minors, but I would like the
 17 court reporter to read back the question
 18 just to conserve judicial resources and not
 19 go back. So if she can reread the question
 20 that would be good.

21 MR. EDWARDS: If you can find the
 22 question.

23 THE COURT REPORTER: Certainly.
 24 MR. EDWARDS: I think I know it.

25 **Q Did you care about any of these underage**

1 Lacks predicate.

2 A Though I would like to answer that
 3 question, like most of your other questions here
 4 today, on advice of counsel I must assert my
 5 Fourteenth Amendment, Fifth Amendment and Sixth
 6 Amendment rights. Though I would like to answer,
 7 if I do so, I risk losing my effective
 8 representation of counsel.

9 **Q Isn't it true, Mr. Epstein, that the**
 10 **only thing that you cared about was accessing as**
 11 **many underage females as possible, for the**
 12 **purposes of sex?**

13 MR. PIKE: Argumentative, speculation,
 14 harassing.

15 A What's the question?

16 MR. PIKE: And assumes facts not in
 17 evidence.

18 **Q Isn't it true that the only thing that**
 19 **you cared about when you were interacting with**
 20 **these underage females in a sexual manner, was**
 21 **ejaculating or your own personal gratification?**

22 MR. PIKE: Form, same exact objections.

23 A Though I would like to answer that
 24 question, and to the ladies and gentlemen of the
 25 jury, I would very much like to answer that

1 **minor females that you were engaging in sex with,**
 2 **at the time when you were engaging in these**
 3 **sexual activities?**

4 MR. PIKE: Same objections, as before.

5 A Though I would like to answer that
 6 question as well as most of your other questions,
 7 if not all of your other questions here today, on
 8 advice of counsel I will have to assert my
 9 Fourteenth Amendment right, my Sixth Amendment
 10 right and my Fifth Amendment right, because no
 11 matter how much I actually want to answer that
 12 question, if I do so I risk losing my counsel's
 13 representation.

14 **Q At the time you were engaging in sexual**
 15 **activity with these underage minors, including**
 16 **██████ you knew that this conduct was illegal,**
 17 **didn't you?**

18 MR. PIKE: Same objections. Form.

19 A I would like to answer that question, as
 20 well as most of your other questions here today;
 21 however, today my counsel has instructed me to
 22 assert my Fourteenth Amendment, Sixth Amendment
 23 and Fifth Amendment right, and if I do not, and
 24 if, in fact, I answer that question -- if I can
 25 answer that question, I potentially risk losing

1 my effective counsel's representation.

2 **Q In fact, you told many of these underage**
3 **minor females not to tell anybody what happened**
4 **with you in the house, or else they would be in**
5 **trouble; isn't that true?**

6 MR. PIKE: Form.

7 A I would like to answer that question, as
8 well as the other questions; however, my counsel
9 has advised me that today I must assert my
10 Fourteenth Amendment, Sixth Amendment and Fifth
11 Amendment rights under the U.S. Constitution.

12 **Q The underage minor females that have**
13 **come forward with information about your sexual**
14 **interactions with them have been investigated,**
15 **harassed, humiliated in an effort for you to**
16 **intimidate them to go away. Is that true?**

17 MR. PIKE: Objection. Argumentative,
18 speculative, compound. It is overbroad, and
19 assumes facts not in evidence.

20 A Can you repeat the question?

21 **Q Sure. Any underage minor female that**
22 **you engaged in sexual activity with, that has now**
23 **pursued a lawsuit against you, isn't it true that**
24 **you've spent a lot of money and a lot of**
25 **resources investigating them in an effort to**

1 **testimony -- to the FBI. You watched her**
2 **deposition when it was being taken. Which --**

3 A You're making assumptions, I'm sorry.

4 MR. PIKE: Let him finish the question.

5 THE WITNESS: Sorry.

6 A My fault.

7 MR. PIKE: Then I'll object and you'll
8 respond.

9 **Q Which are you saying is the truthful**
10 **testimony, her statement to the FBI or the**
11 **videotaped deposition that you watched?**

12 MR. PIKE: Object to the form.

13 A What I've said, and I think I'll repeat
14 myself is until she joined your firm and started
15 to seek money, her testimony was different.
16 That's my understanding.

17 **Q Are you denying any sexual involvement**
18 **with [REDACTED] at this time?**

19 MR. PIKE: Form.

20 A I would like to answer that question. I
21 would like to answer it as with most of your
22 questions here today; however, my attorneys have
23 advised me that I must take that -- assert my
24 rights under the Sixth Amendment, Fourteenth
25 Amendment and Fifth Amendment, no matter how much

1 **intimidate them and hopefully make them go away?**

2 MR. PIKE: Same objections.

3 A I believe your client's testimony
4 changed dramatically when she joined up with you
5 and your law firm, accused of fraud, when she
6 decided to change her testimony, at least from
7 what the statements said, both to the police and
8 to the FBI, and decided to seek money. However,
9 anything above that or beyond that, I'm going to
10 have to, in fact, assert my Fifth Amendment,
11 Sixth Amendment and Fourteenth Amendment rights
12 as directed by my competent counsel.
13 Unfortunately, they have told me if I don't, I
14 risk losing their representation.

15 **Q All right, I'll give you a chance here**
16 **since you keep bringing up her statement to the**
17 **FBI as opposed to her sworn testimony for 13**
18 **hours under oath in this case. Are you saying**
19 **that the sworn testimony to the FBI was, in fact,**
20 **the truth?**

21 A What I'm saying is, it seems her
22 testimony has changed dramatically after she
23 joined your firm, that's all.

24 **Q Okay. Irrespective of her testimony,**
25 **you've read her testimony and you read her**

1 I would like to answer that question, or
2 potentially risk losing my counsel.

3 **Q Isn't your game plan with all of these**
4 **civil lawsuits that have been filed against you,**
5 **to spend as much money as you can to investigate,**
6 **and harass these young women into hopefully**
7 **dropping the lawsuits against you?**

8 MR. PIKE: Objection. Relevance. Move
9 to strike. It is argumentative and
10 harassing.

11 A I would like to answer that question. I
12 think you know the answer to that question.

13 **Q Yes.**

14 A (Witness nods.) However, today my
15 attorneys have advised me I must assert my Sixth
16 Amendment rights, my Fourteenth Amendment rights
17 and my Fifth Amendment rights.

18 **Q You don't have any remorse for the**
19 **sexual abuse that you committed against [REDACTED], do**
20 **you?**

21 MR. PIKE: Objection. It is
22 argumentative. It is harassing. It is, I
23 believe, confined under the Judge's order
24 and it assumes facts not in evidence?

25 A That being said, I would like to answer

1 that question today, but my attorneys have
2 advised me that I must assert my Fourteenth
3 Amendment rights, my Fifth Amendment rights and
4 my Sixth Amendment rights

5 Q In fact, you recently [REDACTED], didn't
6 you?

7 A Yes, and you and your firm that's been
8 accused of the largest fraud in Florida's
9 history, described by the U.S. Attorney as a
10 criminal enterprise involved in money laundering,
11 conspiracy to commit one crime -- excuse me, mail
12 fraud, commit conspiracy to commit wire fraud.
13 Yes, I [REDACTED]

14 Q ** Tell the jury --

15 A Yes.

16 [REDACTED]
17 [REDACTED]
18 [REDACTED]

19 MR. PIKE: I'm going to instruct the
20 witness not to answer that question in this
21 medium, as it is wholly irrelevant
22 currently, as were it, to this particular
23 lawsuit.

24 MR. EDWARDS: Just so you can rethink
25 that position, the lack of remorse goes to

1 Q ** But as it relates to, obviously [REDACTED]
2 sued you making the allegations that you sexually
3 molested her from when she was 13 years old to
4 when she was 16 years old and now [REDACTED]

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]

12 MR. PIKE: I would instruct him not to
13 answer that question, for the same reasons
14 stated.

15 MR. EDWARDS: Let's mark that.

16 Q Is it your feeling that because you are
17 wealthy and these children are poor, that you are
18 entitled to sexually abuse them?

19 MR. PIKE: Argumentative.

20 Q In speaking about these children, and
21 including [REDACTED]

22 MR. PIKE: Argumentative, speculation,
23 compound, it's vague, and it assumes facts
24 not in evidence.

25 A In keeping with your firm's propensity

1 punitive damages, that is an aspect of the
2 case that [REDACTED] has against Mr. Epstein.

3 MR. PIKE: This lawsuit, the current one
4 Mr. Epstein is noticed for, and [REDACTED]

5 [REDACTED]
6 [REDACTED]
7 [REDACTED] is not proper for this
8 medium --

9 MR. EDWARDS: I understand your
10 position.

11 MR. PIKE: -- in that regard, I'm going
12 to instruct him not to answer any questions
13 relative to that lawsuit because of that
14 objection, as well as, it is my
15 understanding that [REDACTED]

16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

23 MR. EDWARDS: I understand your position
24 completely, Mr. Pike.

25 MR. PIKE: Thank you.

1 for filing fellacious (sic), manufactured,
2 sexually charged cases, based on nothing but thin
3 air, accused by the U.S. Attorney of the largest
4 fraud in South Florida's history, by
5 manufacturing sexual cases, I would like to
6 answer each and every one of your questions,
7 including why I sued you, but today I'm not going
8 to be able to. I have to simply listen to my
9 counsel and assert my Sixth Amendment, Fourteenth
10 Amendment and Fifth Amendment right.

11 Q This answer that you keep reciting,
12 about the Rothstein, Rosenfeld, Adler firm --

13 A You do know who they are, right?

14 Q -- you are aware, obviously, that all of
15 the lawsuits that were filed against you,
16 including [REDACTED], were filed at least a year
17 before, or approximately a year before Rothstein,
18 Rosenfeld, Adler had any of these cases; you're
19 aware of that, right?

20 MR. PIKE: Form.

21 A I do not know when Rothstein Adler got
22 involved in these cases. I do know that the
23 moment that they did surface, and, in fact, I
24 understand you shared information with all the
25 other attorneys that you so -- that the jury



1 should understand that the information
2 gathered -- according to the U.S. Attorney, by
3 illegal means, has been shared with all the other
4 attorneys that you keep representing have filed
5 cases against me; yes, I'm aware of that.

6 **Q I don't understand that answer. Steven,
7 do you --**

8 MR. PIKE: Do you have a question?

9 MR. EDWARDS: I want to understand what
10 his answer was. As in all depositions, if
11 you don't understand the answer, clarify the
12 answer.

13 MR. PIKE: No, you have to ask a
14 question.

15 MR. EDWARDS: I did. And he's
16 responding to it.

17 MR. PIKE: The witness has answered the
18 question. Do you have another question to
19 clarify his answer?

20 MR. EDWARDS: Yes.

21 **Q Please clarify your answer.**

22 MR. PIKE: I will instruct him not to
23 answer. It's vague and confusing, it's
24 narrative.

25 MR. EDWARDS: Me saying "clarify your

1 answer" is narrative?

2 MR. PIKE: What do you mean by "clarify
3 your answer?"

4 MR. EDWARDS: I didn't hear what he
5 said. Say it again so I can hear it.

6 MR. PIKE: Would you please read back
7 what Mr. Epstein just testified to, madam
8 court reporter.

9 (The record was read.)

10 MR. EDWARDS: Okay.

11 MR. PIKE: It was an answer, a
12 question --

13 MR. EDWARDS: I understand -- I mean I
14 don't understand the answer, but now I know
15 the answer.

16 MR. PIKE: Okay.

17 **Q At this point in time, please tell the
18 jury what is your defense of the claims being
19 asserted against you in this lawsuit by [REDACTED]?**

20 MR. PIKE: I'm going to object. Calls
21 for a legal conclusion.

22 A What are the claims? So since you're
23 representing [REDACTED] can you tell me what the
24 claims are?

25 **Q Yes, we've gone through it. She went to**

1 your house when she was 13, 14, 15, 16 years
2 old --

3 A Is that a claim?

4 **Q -- she was in your bedroom. You
5 instructed her to get naked. You inserted your
6 fingers into her vagina. You used a vibrator on
7 her. You coerced her into recruiting other
8 underage minor females, roughly 50 or so more.**

9 **These are all claims that have amounted
10 to various counts, coercion, prostitution,
11 intentional infliction of emotional distress,
12 battery, committing various crimes against her.
13 What are your defenses to that? Normal defenses
14 are "I didn't do it," "I did it, but it didn't
15 hurt her," we are trying to understand so we know
16 how to provide this case to the jury, what are
17 your defenses to these allegations?**

18 MR. PIKE: I'm going to object to this
19 line of questioning. It is compound; as
20 worded it could call for disclosure of
21 attorney/client information as well as work
22 product. I believe in this particular case
23 there is a document filed, answer in
24 affirmative defenses, and the affirmative
25 defenses are set forth there and the

1 document there speaks for itself.

2 MR. EDWARDS: Okay.

3 **Q Respond.**

4 A The document speaks for itself.

5 **Q ** So you agree with the affirmative
6 defenses that were filed in your case? If you
7 were to testify, we could expect that to be your
8 testimony?**

9 MR. PIKE: That's not what the witness
10 testified. The witness testified that the
11 document speaks for itself, and again, I'm
12 going to object to attorney/client, work
13 product and instruct the witness not to
14 answer.

15 **Q I'm not asking what your legal defense
16 is. I'm asking: What is your response to the
17 claims?**

18 MR. PIKE: Same objection.

19 **Q What is your personal response?**

20 A I would like to respond to that
21 question. I would like to respond today to that
22 question; however, today my attorneys have told
23 me that I cannot respond. They've asked me to
24 assert my Fourteenth Amendment, Sixth Amendment
25 and Fifth Amendment rights of the U.S.

1 Constitution, though I would really like to
2 respond. They are telling me if I did so, I will
3 lose risking their representation.

4 **Q I know you've invoked your Fifth**
5 **Amendment rights related to many of these**
6 **questions, but isn't it true you recently**
7 **contacted [REDACTED]**
8 **and spoke to him about [REDACTED] case as well as**
9 **several of the other girls, who have claims**
10 **against you?**

11 A Who?

12 Q [REDACTED]

13 A Can you repeat the question?

14 **Q Didn't you recently, within the last**
15 **year, contact [REDACTED]**
16 **[REDACTED] and discuss these cases that have been filed**
17 **against you and the allegations made by these**
18 **various females?**

19 MR. PIKE: Form.

20 A I would like to answer that question,
21 but unfortunately today my attorneys have advised
22 me I cannot. They've advised me I must assert my
23 Sixteenth -- excuse me, my Fourteenth Amendment,
24 Sixth Amendment and Fifth Amendment right, so
25 therefore, I will do so.

1 A (Laughter.)... Did I tell... I would
2 like to answer that question, but today on advice
3 of my counsel, I must -- as I have done with
4 mostly each one of your questions, I have to
5 assert my Fifth Amendment, Sixth Amendment and
6 Fourteenth Amendment rights under the U.S.
7 Constitution.

8 **Q You were 51 when [REDACTED] was 14, and you**
9 **were interacting with her sexually. Is it your**
10 **testimony that despite the disparity in age you**
11 **do not consider [REDACTED] to be a victim?**

12 MR. PIKE: Argumentative, speculation,
13 assumes facts not in evidence. Compound,
14 lacks predicate.

15 A Not only does it contradict your own
16 client's statements to the FBI under sworn
17 testimony, I would like to answer that question.
18 Hopefully one day I can answer that question, but
19 today my attorneys have said I cannot. They
20 advised me I must assert my Sixth Amendment,
21 Fifth Amendment and Fourteenth Amendment rights.

22 **Q In the last ten years, what is the**
23 **youngest underage minor female that you have**
24 **interacted with sexually?**

25 MR. PIKE: Argumentative, speculation,

1 **Q Why is it that you will talk to [REDACTED]**
2 **[REDACTED] about this but you will not talk to the jury**
3 **about this?**

4 MR. PIKE: Form. Argumentative,
5 speculation. Misstates the witness's
6 testimony. It assumes facts -- the question
7 assumes facts not in evidence and now lacks
8 predicate.

9 A So who is [REDACTED] again?

10 **Q [REDACTED]**
11 **Did you not talk to him? If you**
12 **didn't talk to him, tell me that. That's fine.**

13 MR. PIKE: Same objections.

14 A I would like to tell you answers to each
15 one of your questions, however today my attorneys
16 have demanded that I respond by asserting my
17 Fourteenth Amendment, Sixth Amendment, Fifth
18 Amendment privilege, though I would like to
19 respond, but they said if I do so, I risk losing
20 their representation.

21 **Q Didn't you tell [REDACTED] these**
22 **underage minors were not victims at all and that**
23 **regardless of their age, you did not personally**
24 **consider them victims?**

25 MR. PIKE: Same objection.

1 assumes facts not in evidence.

2 A The answer to that question is -- I
3 would like to give you an answer to that today,
4 but my attorneys have advised me I must assert my
5 Fourteenth Amendment rights, my Sixth Amendment
6 rights and Fifth Amendment rights.

7 **Q Do you know Michael Friedman?**

8 A Doesn't ring a bell.

9 **Q Former housekeeper/employee of yours,**
10 **worked at the Palm Beach house?**

11 A ... Could. Don't know.

12 **Q So you would be unable to answer what**
13 **Michael Friedman did for you?**

14 A Yes.

15 **Q Are you aware that our investigator**
16 **spoke with Michael Friedman, former housekeeper**
17 **for you, or housemanager for you, out in**
18 **California?**

19 A No.

20 **Q Any reason why when asked about the**
21 **activity that occurred in your house, he would**
22 **tear up and say, "I was hoping to forget**
23 **everything I saw"?**

24 MR. PIKE: Objection, argumentative.

25 Speculative. Assumes facts not in

1 evidence.
 2 A Again, the question?
 3 **Q Is there any reason that when asked --**
 4 A I don't know who he is.
 5 MR. PIKE: Also, hearsay.
 6 THE VIDEOGRAPHER: Counsel?
 7 MR. EDWARDS: Go ahead.
 8 THE VIDEOGRAPHER: Going off the video
 9 record 3:23 p.m.
 10 (Pause in the proceedings.)
 11 THE VIDEOGRAPHER: Back on the video
 12 record 3:30 p.m.
 13 **Q This person that I asked you about,**
 14 **Michael Friedman, is that somebody who has**
 15 **contacted you within the last six months?**
 16 A ... No.
 17 **Q In taking a break and thinking about**
 18 **some of these questions, have you remembered who**
 19 **that person is, or still no real memory of him at**
 20 **all?**
 21 A No real memory.
 22 **Q To the best of your knowledge, he never**
 23 **worked for you?**
 24 MR. PIKE: Form.
 25 A Not that I can recall, but there are

1 lots of people who work for me, so...
 2 **Q Can you tell the jury who the various**
 3 **people are that work for you now?**
 4 A I believe I answered that question
 5 already.
 6 **Q In that you invoked your Fifth**
 7 **Amendment, correct?**
 8 A That's correct, Sixth Amendment and
 9 Fourteenth Amendment.
 10 **Q Eighteen and twenty-first?**
 11 A (Witness shrugs.)
 12 MR. PIKE: Move to strike.
 13 **Q ** Have you, during this litigation, and**
 14 **by "this litigation," I don't only mean [REDACTED]**
 15 **case, but the various other lawsuits that have**
 16 **been filed against you by other females alleging**
 17 **sexual misconduct by you against them. Who have**
 18 **you retained attorneys for, what witnesses have**
 19 **you retained attorneys for?**
 20 MR. PIKE: Object to the form.
 21 MR. EDWARDS: Okay.
 22 MR. PIKE: I'll instruct him not to
 23 answer because I don't understand the
 24 question. Okay?
 25 MR. EDWARDS: All right.

1 **Q During this civil discovery and**
 2 **litigation --**
 3 A Um-hum?
 4 **Q -- have you paid for, and/or retained an**
 5 **attorney for any other witnesses?**
 6 A Any other witnesses?
 7 **Q Yes, like I'll give you an example that**
 8 **you may, just to refresh your recollection or**
 9 **tell you what I'm talking about, [REDACTED]**
 10 **you know who that is, right?**
 11 A Yes.
 12 **Q She is someone that works for you now,**
 13 **she's a housekeeper. We took her deposition**
 14 **already. At least that's what her testimony**
 15 **was.**
 16 MR. PIKE: Form.
 17 A I would like to answer that question but
 18 I have to assert my Sixth Amendment, Fourteenth
 19 and Fifth.
 20 **Q That somebody who has informed us that**
 21 **you paid for and obtained an attorney by the name**
 22 **of Bruce Reinhart to represent her during this**
 23 **process. Is that --**
 24 MR. PIKE: Form.
 25 A I have to assert my Fifth Amendment,

1 Sixth Amendment and Fourteenth Amendment, right.
 2 **Q Other people that have indicated that**
 3 **you retained and paid for an attorney to**
 4 **represent them are Michael Friedman, [REDACTED]**
 5 **[REDACTED] Janusz Banaziak [REDACTED]**
 6 **Ghislaine Maxwell, your brother, Mark Epstein,**
 7 **[REDACTED] [REDACTED] Larry Visoski, Larry**
 8 **Morrison, David Rogers, Igor Zinoviev. Have I**
 9 **missed anybody else that during this litigation**
 10 **you've paid for or retained attorneys?**
 11 MR. PIKE: Form, same objection.
 12 A I'm not clear. Are you suggesting I've
 13 paid for attorneys for all these people?
 14 **Q Yes.**
 15 A (Laughter,) I would like to answer those
 16 questions today, but on the advice of counsel I
 17 have to invoke my Sixth Amendment, Fifth
 18 Amendment and Fourteenth Amendment right.
 19 **Q If you have not, tell me which of those**
 20 **on that list that you have not paid for or**
 21 **retained attorneys for?**
 22 MR. PIKE: Same objection.
 23 A Same answer.
 24 **Q You're invoking your Fifth Amendment,**
 25 **right?**

1 A And Sixth Amendment and Fourteenth
2 Amendment... and Fifth Amendment.

3 Q **** Is it a company or is it you,
4 personally, that is paying for the attorneys'
5 fees related to your representation?**

6 MR. PIKE: I'm going to object to the
7 form. I'm going to instruct him not to
8 answer that question based on relevance; and
9 it is vague also.

10 Q **Who is writing the check to your
11 attorneys for your representation in this
12 lawsuit?**

13 A (No response.)

14 Q **Who is paying the bill?**

15 A I believe I am.

16 Q **And is it you, personally, or is this
17 one of your corporations or companies?**

18 MR. PIKE: Form, speculation.

19 A I'm not sure.

20 Q **As you sit here today, you're not really
21 sure whether it is coming from one of the other
22 corporations that we've discovered during
23 discovery or it is coming from you, personally?
24 Is that correct?**

25 MR. PIKE: Asked and answered.

1 A I believe -- I would like to answer but
2 I have to invoke my Sixth, Fourteenth and Fifth
3 Amendment rights.

4 Q **As it relates to any of the other
5 witnesses who have had attorneys retained for
6 them, is it also your response to invoke your
7 Fifth Amendment rights, rather than to provide me
8 with an answer, as to who is paying the bill for
9 those attorneys?**

10 A I would like to answer those questions,
11 but today my attorneys have asked me not to
12 respond to any questions that may be relevant to
13 this lawsuit, so I must follow their advice and
14 invoke the Sixth Amendment, Fifth Amendment and
15 Fourteenth Amendment, right.

16 Q **Have you interacted sexually with any
17 underage minors in the last year, while on house
18 arrest or work release from jail?**

19 MR. PIKE: Objection. Argumentative and
20 compound and lacks predicate.

21 A I would like to answer that question,
22 but on advice of counsel, at least today, they've
23 advised me I must invoke my Sixth Amendment,
24 Fourteenth and Fifth Amendment right.

25 MR. PIKE: It is also overbroad.

1 Q **If me narrowing down will help you to
2 respond, I will. Is there any need for that?**

3 A (Witness shakes head.)

4 MR. EDWARDS: Okay.

5 THE WITNESS: Sorry.

6 Q **Is it your intent to interact sexually
7 with minors in the future?**

8 MR. PIKE: Same objection.

9 A I would like to answer that question,
10 but today my counsel has advised me I must invoke
11 the rights of the Sixth Amendment, the Fourteenth
12 Amendment and the Fifth Amendment of the U.S.
13 Constitution.

14 Q **Are you currently treating with a
15 psychologist related to any sex addiction that
16 you have with minors?**

17 A I would like to answer that question, as
18 well, as most of the other... questions you've
19 asked me today; however, on advice of counsel
20 they've asked me to invoke my Sixth Amendment,
21 Fourteenth Amendment and Fifth Amendment right,
22 therefore, though I would like to answer that
23 question, as well as the other ones, I risk
24 losing the representation if I do so.

25 MR. PIKE: Moreover I'm going to object

1 to relevance as I have in the past since Mr.
2 Epstein's medical history is not at issue in
3 this case; under the legal terms.

4 Q **You would agree, wouldn't you, that you
5 targeted these underage girls including [REDACTED]
6 because of their young age?**

7 MR. PIKE: Argumentative, speculative,
8 harassing. Assumes facts not in evidence.

9 A I would like to answer that question, as
10 well as most of the other questions you've asked
11 me here today. My counsel has advised me that I
12 must assert my Fourteenth Amendment, Sixth
13 Amendment and Fifth Amendment right. Though I
14 would like to answer those questions today... if
15 I do so, I risk losing their representation.

16 Q **You would also agree, wouldn't you, that
17 you targeted these underage females for sex,
18 including [REDACTED], because they were poor?**

19 MR. PIKE: Same objections.

20 A I would like to answer that question. I
21 would really like to answer that question, as
22 well as the other questions you've asked me here
23 today, however, on advice of my counsel they've
24 demanded that I assert my Fifth Amendment, Sixth
25 Amendment and Fourteenth Amendment rights. If I

1 answer that question, I risk losing their
2 representation.

3 **Q You would agree, wouldn't you, that you**
4 **sexually molested [REDACTED] for three years?**

5 MR. PIKE: Same objection.

6 A I think you've asked me that question
7 before. I assert the same rights as before.

8 **Q That's the Fifth, Sixth and Fourteenth**
9 **amendments, just so the record is clear?**

10 A Yes.

11 **Q You would agree, wouldn't you, that you**
12 **coerced [REDACTED] into prostitution?**

13 MR. PIKE: Same objections.

14 A I believe her own testimony reflects, at
15 least the sworn statement to the FBI, reflects
16 that that is not the case; and though I would
17 like to answer that question in great detail, I
18 cannot do so today on advice of counsel, that
19 have asked me to assert my Sixth Amendment, Fifth
20 Amendment and Fourteenth Amendment rights. If I
21 do so, I risk losing their representation.

22 **Q You would agree with me that you groomed**
23 **[REDACTED] into becoming a prostitute?**

24 MR. PIKE: I'm going to object.

25 Argumentative, speculative. Certainly lacks

1 predicate and assumes facts not in
2 evidence.

3 A You know I would like to answer that
4 question, but I can't today. Under advice of
5 counsel I have to assert my Fourteenth Amendment,
6 Sixth Amendment and Fifth Amendment rights. If I
7 answer the question, I risk losing their
8 counsel.

9 **Q You would agree, wouldn't you, that you**
10 **brainwashed [REDACTED] into believing that this**
11 **lifestyle of prostitution was right?**

12 MR. PIKE: Same objections.

13 A I would like to answer that question, as
14 most of your other questions here today, Mr.
15 Edwards. On advice of counsel today, I'm going
16 to have to assert my Fifth Amendment, Sixth
17 Amendment, Fourteenth Amendment rights. If I
18 answer that question, I risk losing their
19 representation.

20 **Q Would you agree that your interaction**
21 **with [REDACTED] when she was a minor, was degrading to**
22 **her?**

23 MR. PIKE: Same objections.

24 A I would like to answer that question. I
25 would like to answer all of your questions here

1 today; however, my counsel has advised me that I
2 must assert my Fourteenth Amendment rights, my
3 Sixth Amendment rights and my Fifth Amendment
4 rights, and though I would like to answer those
5 questions, if I do so I risk losing their
6 representation.

7 THE WITNESS: Can we take a ten-minute
8 break for some air?

9 MR. EDWARDS: We have 15 minutes and
10 we're done.

11 THE WITNESS: Continue then?

12 MR. EDWARDS: Okay.

13 **Q Would you agree that you intentionally**
14 **indoctrinated [REDACTED] into this very deviant sexual**
15 **lifestyle?**

16 MR. PIKE: Okay, I'm going to object.
17 It is argumentative. It is confusing. It
18 is speculative, vague, lacks predicate and
19 assumes facts not in evidence.

20 A And on top of that, I would like to
21 answer that question, but my counsel has advised
22 me I must assert my Fourteenth Amendment, Sixth
23 Amendment and Fifth Amendment rights under the
24 U.S. Constitution. Although I would like to
25 answer all your questions today, I cannot do so

1 risking losing their representation.

2 **Q Would you agree that you were personally**
3 **responsible for destroying her life?**

4 MR. PIKE: Same act objections.

5 A Her life?

6 **Q [REDACTED]**

7 A I would like to answer that question,
8 and I understand how your firm has been accused
9 of fabricated sexually charged lawsuits in order
10 to fleece investors locally in South Florida.
11 The U.S. Attorney has called your law firm a
12 criminal enterprise based on filing fellacious
13 (sic) sexually charged cases. Although I would
14 like to answer that question today, Mr. Edwards,
15 and Mr. Jaffe, my counsel has told me that I have
16 to assert my rights under the Sixth Amendment,
17 Fifth Amendment and Fourteenth Amendment, and if
18 I don't do so, I risk losing their
19 representation.

20 **Q We have a factual basis for asking every**
21 **question and making every allegation. I want to**
22 **provide you with a last opportunity to tell the**
23 **jury which of these allegations, if any, being**
24 **made by [REDACTED] are false or fabricated in any**
25 **way?**

1 MR. PIKE: Same objections. Mr.
2 Edwards, you know the tenor of that question
3 cannot be answered without waiver of Fifth,
4 Sixth and Fourteenth. I appreciate the
5 question and the semantics of it, but it
6 is... It is -- can you rephrase it?

7 MR. EDWARDS: Yes.

8 **Q Many times -- you know the allegations**
9 **now, we've gone through them, [REDACTED] allegations**
10 **and assertion of facts as to what happened**
11 **between you and her when she was 13, 14 and 15**
12 **years old and you were [REDACTED] years old.**
13 **Several times you responded saying something**
14 **about Rothstein, Rosenfeld & Adler, something**
15 **about her FBI statement, what have you; I want to**
16 **give you a chance to tell the jury, which of her**
17 **allegations, if any, that you believe now are**
18 **false or fabricated in any way.**

19 MR. PIKE: Same objections.

20 A I would like to respond to that
21 question, the fact that her firm, the law firm
22 representing her has been accused by the U.S.
23 Attorney of being a criminal enterprise,
24 manufacturing, fabricating, out of thin air,
25 cases involving sexual allegations, sexual

1 allegations in order to simply fleece local
2 investors out of millions of dollars, so I would
3 very much like to answer that question regarding
4 the truthfulness of [REDACTED] allegations; however
5 today my counsel has told me that I must assert
6 my Fifth Amendment rights, Sixth Amendment rights
7 and Fourteenth Amendment rights under the U.S.
8 Constitution, though I would very much like to
9 answer that questions but if I do I risk losing
10 their representation.

11 **Q Would you agree you owe [REDACTED] at least**
12 **\$15,000,000 to compensate her for the damage**
13 **which you have caused?**

14 MR. PIKE: Objection. I move to
15 strike. Argumentative. Compound. Lacks
16 substantial predicate. Assumes... facts...
17 not in evidence.

18 A As you might imagine, though your law
19 firm has been accused of perpetrating a fraud
20 involving millions and millions of dollars, on
21 unsuspecting investors here in South Florida,
22 millions of dollars by fabricating similar
23 allegations, convincing people to give money to
24 the firm that helped bring this lawsuit, I'm
25 afraid I would like to answer those questions but

1 no matter how much I would like to answer those
2 questions, I am going to have to decline based on
3 my counsel's advice to invoke, at least today, my
4 Fifth Amendment, Sixth Amendment and Fourteenth
5 Amendment rights under the U.S. Constitution;
6 because if I don't, I risk losing their
7 representation.

8 **Q Is it true that you're currently worth**
9 **more than one billion dollars personally?**

10 A I would like to answer that question, as
11 I would like to answer most of your other
12 questions. I know that's a lot of money --
13 actually the amount of money that the U.S.
14 attorneys accused your firm of trying to steal
15 from the people of South Florida. It was 1.2
16 billion dollars, the U.S. Attorney claimed your
17 firm perpetrated the largest fraud in South
18 Florida's history by stealing that sum of money
19 from local investors, based on false allegations
20 of sexually charged claims, and although I would
21 like to answer these questions with specificity,
22 under advice of counsel today, I'm going to have
23 to refuse, based on my Sixth Amendment,
24 Fourteenth Amendment and Fifth Amendment right,
25 and though I would like to answer the question, I

1 have been told if I do so I risk losing their
2 representation, Mr. Edwards.

3 **Q I'm simply asking: What is your**
4 **personal net worth at this time?**

5 MR. PIKE: Form.

6 A I think I've answered the question,
7 but...

8 **Q What is your personal net worth at this**
9 **time? So the answer should be a number or should**
10 **be you invoking your Fifth Amendment rights.**
11 **Seemed like the opposite.**

12 MR. PIKE: Asked and answered, he did
13 invoke his Fifth, Sixth and Fourteenth.

14 MR. EDWARDS: His answer included
15 something about Rothstein, Rosenfeld and
16 Adler stealing some certain amount of money,
17 which obviously is nonresponsive, I move to
18 strike it and ask that he actually responds
19 to the question with something that's
20 responsive. He can answer the question,
21 invoke Fifth Amendment rights, and we will
22 get out of here.

23 **Q We will start over again.**

24 **Can you please tell the jury what your**
25 **current personal net worth is currently?**

1 A I would like to do that today, however,
2 I'm sure that one of the reasons, since your firm
3 has been accused of stealing millions of dollars
4 from local investors based on fabricated, totally
5 fabricated claims, this is not by me but the U.S.
6 Attorney, has called your firm a criminal
7 enterprise charged with stealing hundreds of
8 millions of dollars frankly, from local
9 investors, based on false claims of sexually
10 charged nature, I would like to answer that
11 question in detail. However, my attorneys have
12 advised me I cannot answer any questions that may
13 be relevant to this lawsuit and by doing so, I
14 must invoke my Sixth Amendment, Fifth Amendment,
15 Fourteenth Amendment right and by answering the
16 question, I risk losing their representation.

17 **Q Is it true you're worth 1.8 billion**
18 **dollars?**

19 MR. PIKE: Same objection.

20 A Same answer.

21 **Q Put the answer.**

22 MR. PIKE: For the record.

23 A I'm sure that's an interesting question
24 and I would like to answer that question for
25 you. I'm sure you would like to know as your

1 firm has been charged with stealing over a
2 billion dollars from local investors and your
3 senior partner of both you and Mr. Jaffe sitting
4 there shaking his head, sits in jail accused of
5 fleecing local and foreign investors based on
6 false sexual claims from people. And although I
7 would like to answer that question, like I would
8 answer most of your other questions, my counsel
9 has advised me today, ladies and gentlemen of the
10 jury, I cannot answer that question. Maybe I can
11 in the future. However, if I do so today, I risk
12 losing their representation, so I must assert
13 those rights under the Sixth, Fifth and
14 Fourteenth amendments.

15 **Q You would agree, would you not, that it**
16 **would take a jury award of at least 45 million**
17 **dollars in punitive damages to punish you for**
18 **doing what you did to [REDACTED]?**

19 MR. PIKE: Same objections.

20 A I would like to answer that question, as
21 I would like to answer all your other and Mr.
22 Jaffe's questions today. However, while he sits
23 shaking his head I'm going to have to respond
24 to -- my counsel has advised me I cannot answer
25 that question today, though I would like to.

1 Though I would like to answer with specificity,
2 however if I do so, I risk losing their
3 representation so I must assert my rights under
4 Sixth, Fifth and Fourteenth Amendment.

5 **Q Isn't it true, Mr. Epstein, that as long**
6 **as you have the money to do it, you will continue**
7 **to engage in sex with minors?**

8 MR. PIKE: Again, extremely
9 argumentative, speculative. I'm allowing
10 the question to give leeway, so we don't
11 have to come back here again. It is
12 harassing.

13 A And with that, I'm sure this -- ladies
14 and gentlemen of the jury, will... be able to see
15 you and your partner, who your firm has been
16 accused of massive fraud in South Florida trying
17 to steal hundreds of millions of dollars from
18 local investors, from creating, fabricating
19 malicious, sexually charged claims, called by the
20 U.S. Attorney a criminal enterprise charged with
21 money laundering, conspiracy to commit other --
22 federal violations, so though I would like to
23 answer that question, Mr. Edwards, and Mr. Jaffe,
24 today, I cannot. I must invoke my Sixth, Fifth
25 and Fourteenth Amendment rights, on advice of

1 counsel or risk losing their representation.

2 **Q Am I correct in my understanding that**
3 **you have invoked your Fifth Amendment rights**
4 **because your answers would incriminate you and**
5 **lead to your prosecution?**

6 MR. PIKE: I'm going to --

7 MR. EDWARDS: Exactly as phrased by Mr.
8 Luttier to [REDACTED] I did not say anything but
9 allow her to answer the question.

10 MR. PIKE: Object to the form.

11 A In fact, since you are a lawyer I'm sure
12 you're aware the Supreme Court has said the Fifth
13 Amendment is used more often to protect innocent
14 people. So that's -- but today on advice of
15 counsel I've taken that right.

16 MR. EDWARDS: (Gesturing.)

17 MR. PIKE: I have no questions.
18 We will read.

19 MR. EDWARDS: No further questions.

20 THE VIDEOGRAPHER: Off the video record,
21 3:52 p.m.

22 THE COURT REPORTER: Can he read your
23 copy Mr. Pike?

24 MR. PIKE: Yes.

25 THE COURT REPORTER: Thank you all.

178	<p>1 MR. PIKE: On the record, I don't want a</p> <p>2 word index.</p> <p>3 THE COURT REPORTER: Okay.</p> <p>4 (Discussion off the record.)</p> <p>5 MR. PIKE: I would like this tomorrow,</p> <p>6 please.</p> <p>7 Let's go regular but definitely before</p> <p>8 that -- before Tuesday, if possible.</p> <p>9 THE COURT REPORTER: Sure, that will be</p> <p>10 50 percent expedite?</p> <p>11 MR. PIKE: That's fine.</p> <p>12 THE COURT REPORTER: My pleasure.</p> <p>13 (Time noted: 4:00 o'clock p.m.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	180	<p>1 THE STATE OF FLORIDA)</p> <p>2 COUNTY OF PALM BEACH)</p> <p>3</p> <p>4</p> <p>5 The foregoing certificate was</p> <p>6 acknowledged before me this _____</p> <p>7 day of _____ 2009, by TERRI</p> <p>8 BECKER, who is personally known to me.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16 Notary Public, State of Florida.</p> <p>17 My commission No.</p> <p>18 Expires March 13, 2011.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
179	<p>1 THE STATE OF FLORIDA)</p> <p>2 COUNTY OF PALM BEACH)</p> <p>3 I, TERRI BECKER, a Registered</p> <p>4 Professional Reporter and Notary Public for the</p> <p>5 State of Florida at Large, do hereby certify that</p> <p>6 I reported the videotaped deposition of JEFFREY</p> <p>7 EPSTEIN, the DEFENDANT, called by the PLAINTIFF</p> <p>8 in the above-entitled action; that the witness</p> <p>9 was duly sworn by me; that the foregoing pages,</p> <p>10 numbered from 1 to 183, inclusive, constitute a</p> <p>11 true record of the deposition by said witness.</p> <p>12 I further certify that I am not attorney</p> <p>13 or counsel of any of the parties, nor a relative</p> <p>14 or employee of any attorney or counsel connected</p> <p>15 with the action, nor financially interested in</p> <p>16 the action.</p> <p>17 WITNESS MY HAND and official seal in the</p> <p>18 City of West Palm Beach, County of Palm Beach,</p> <p>19 State of Florida, this 22nd day of February 2010.</p> <p>20</p> <p>21 _____</p> <p>22 TERRI BECKER, Registered</p> <p>23 Professional Reporter and</p> <p>24 Notary Public, State of Florida</p> <p>25 at Large. My Commission expires</p> <p>March 13, 2011.</p>	181	<p>1 I, JEFFREY EPSTEIN, do hereby</p> <p>2 certify that I have read the foregoing transcript</p> <p>3 of my deposition given on February 17, 2010; that</p> <p>4 together with the correction page attached hereto</p> <p>5 noting changes in form or substance, if any, it</p> <p>6 is true and correct.</p> <p>7</p> <p>8 _____</p> <p>9 JEFFREY EPSTEIN</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14 I do hereby certify that the deposition</p> <p>15 of JEFFREY EPSTEIN was submitted to the witness</p> <p>16 for reading and signing; that after he had stated</p> <p>17 to the undersigned Notary Public that he had read</p> <p>18 and examined her deposition, he signed the same</p> <p>19 in the presence of the undersigned authority on</p> <p>20 the ____ day of _____ 2010.</p> <p>21 _____</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

1 ERRATA SHEET
2 In Re: L.M. V. EPSTEIN
3 DO NOT WRITE ON TRANSCRIPT
4 ENTER CHANGES HERE:

5 PAGE LINE CHANGE REASON

6				
7				
8				
9				
10				
11				
12				
13				
14				

15 _____
JEFFREY EPSTEIN

16
17
18 THE STATE OF FLORIDA)
19 COUNTY OF PALM BEACH)
20 I DO HEREBY CERTIFY THAT JEFFREY EPSTEIN
21 appeared before me and stated that he has read
22 his deposition; further, that this Errata Sheet
23 was signed in my presence on this _____ day
24 of _____ 2010.
25 _____

1 U.S. LEGAL SUPPORT
2 Registered Professional Reporters
3 444 West Railroad Avenue
4 Suite 300
5 West Palm Beach, Florida 33401

6 February 22, 2010

7 BURMAN, CRITTON, LUTTIER & COLEMAN
8 303 Banyon Boulevard
9 Suite 400
10 West Palm Beach, Florida 33401

11 ATTENTION: MICHAEL PIKE, ESQ.

12 In Re: _____ V. EPSTEIN

13 Deposition of: JEFFREY EPSTEIN

14 Dear Mr. Pike:

15 Since counsel have agreed that you may
16 have the witness read and sign your copy of the
17 deposition, for your convenience, enclosed
18 herewith you will find an Errata Sheet for the
19 witness' use in entering any changes to the
20 deposition.

21 Thank you for your prompt attention.
22 Cordially yours,
23 U.S. LEGAL SUPPORT

24 _____
25 TERRI BECKER, Registered
Professional Reporter, Notary
Public, State of Florida at
Large. My commission expires
March 13, 2011.

CC: Bradley Edwards, Esq.