

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE No. 502009CA040800XXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

-vs-

SCOTT ROTHSTEIN, individually,  
BRADLEY J. EDWARDS, individually, and  
█., individually,

Defendants.

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VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

Wednesday, March 17, 2010  
10:17 a.m. - 1:27 p.m.

303 Banyan Boulevard  
Suite 400  
West Palm Beach, Florida 33401

Reported By:  
Sandra W. Townsend, FPR  
Notary Public, State of Florida  
West Palm Beach Office Job #1358

█ PROSE COURT REPORTING AGENCY, INC. █

Electronically signed by Sandra Townsend (401-█)  
Electronically signed by Sandra Townsend (401-█)

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1 APPEARANCES:  
 2 On behalf of the Plaintiff:  
 3 MICHAEL PIKE, ESQUIRE  
 4 BURMAN CRITTON LUTTIER & COLEMAN, LLP  
 5 303 Banyan Boulevard, Suite 400  
 6 West Palm Beach, Florida 33401  
 7 Phone: [REDACTED]  
 8  
 9 On behalf of the Defendant Bradley Edwards:  
 10 JACK SCAROLA, ESQUIRE  
 11 SEARCY, DENNEY, SCAROLA, BARNHART & SHIPLEY  
 12 2139 Palm Beach Lakes Boulevard  
 13 West Palm Beach, Florida 33409  
 14 Phone: [REDACTED]  
 15 On behalf of the Defendant [REDACTED]:  
 16 BRADLEY EDWARDS, ESQUIRE  
 17 FARMER, JAFFE, WEISSING, EDWARDS, FISTOS,  
 18 & LEHRMAN, P.L.  
 19 425 North Andrews Avenue  
 20 Suite 2  
 21 Fort Lauderdale, Florida 33301  
 22 Phone: [REDACTED]  
 23 Also Present:  
 24 STEVEN JAFFE, ESQUIRE  
 25 FARMER, JAFFE, WEISSING, EDWARDS, FISTOS,  
 & LEHRMAN, P.L.  
 425 North Andrews Avenue  
 Suite 2  
 Fort Lauderdale, Florida 33301  
 Phone: [REDACTED]

1 PROCEEDINGS  
 2 ---  
 3 Deposition taken before Sandra W. Townsend, Court  
 4 Reporter and Notary Public in and for the State of  
 5 Florida at Large, in the above cause.  
 6 ---  
 7 VIDEOGRAPHER: We are now on video record.  
 8 This is media number one in the videotaped  
 9 deposition of Jeffrey Epstein in the matter of  
 10 Jeffrey Epstein versus Scott Rothstein, Bradley  
 11 Edwards and [REDACTED].  
 12 Today is Wednesday, March 17, 2010 at  
 13 10:17 a.m.  
 14 We are at the law offices of Burman,  
 15 Critton -- Banyan -- of Burman, Critton on Banyan  
 16 Boulevard, Suite 400, West Palm Beach, Florida.  
 17 My name is Joe Kozak. I'm the videographer.  
 18 The court reporter is Sandra Townsend from Prose  
 19 Court Reporting Agency.  
 20 Would Counsel please introduce yourselves and  
 21 then the court reporter will swear in the witness.  
 22 MR. SCAROLA: My name is Jack Scarola. I am  
 23 Counsel on behalf of Brad Edwards in his capacity,  
 24 both as Defendant and Counter-Plaintiff in this  
 25 action. Mr. Edwards is present with me.

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 2 EXHIBITS  
 3 ---  
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 5 NUMBER DESCRIPTION PAGE  
 6 Exhibit number 1 Eyeglasses 133  
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1 MR. PIKE: Michael Pike, on behalf of the  
 2 Plaintiff, Jeffrey Epstein.  
 3 MR. EDWARDS: Brad Edwards, on behalf of the  
 4 Defendant, [REDACTED].  
 5 Also present, Steve Jaffe, on behalf of the  
 6 Defendant, [REDACTED], as well.  
 7 THEREUPON,  
 8 JEFFREY EPSTEIN,  
 9 having been first duly sworn or affirmed, was examined  
 10 and testified as follows:  
 11 THE WITNESS: Yes, I do. Thank you.  
 12 MR. PIKE: Before we get started, Jack, I just  
 13 wanted to get on the record, I just want to make  
 14 sure that you received this letter that I sent to  
 15 your office yesterday of March 16, 2010.  
 16 MR. SCAROLA: I did receive the letter.  
 17 MR. PIKE: Okay. And we're still on for  
 18 Mr. Edwards' deposition, as we sit here today?  
 19 MR. SCAROLA: That's correct.  
 20 MR. PIKE: Okay. Thank you.  
 21 DIRECT EXAMINATION  
 22 BY MR. SCAROLA:  
 23 Q. Please state your full name and your current  
 24 residence address.  
 25 A. My name is Jeffrey Epstein. I'm currently

1 residing at 358 El Brillo in Palm Beach.  
 2 Q. How long have you resided at that location,  
 3 Mr. Epstein?  
 4 A. I'm sorry. On advice of Counsel today, I'm  
 5 going to take the Fifth, Sixth and 14th Amendment with  
 6 respect to that question, Mr. Scarola.  
 7 Q. Have you maintained any other residences over  
 8 the course of the last five years?  
 9 A. Though I'd like to answer each and every one  
 10 of your questions here today, with respect to that  
 11 question I'm going to have to assert my Constitutional  
 12 Rights as provided by the Sixth, 14th and Sixth --  
 13 Fifth -- sorry -- Fifth, Sixth and 14th Amendment.  
 14 Q. Does anyone reside with you at the El Brillo  
 15 address?  
 16 A. Again, Mr. Scarola, though I'd like to answer  
 17 each and every one of your questions here today, at  
 18 least with respect to that question, I'm going to have  
 19 to assert my rights as under the Sixth, Fifth and 14th  
 20 Amendment.  
 21 And I've been advised by Counsel, though I'd  
 22 like to answer these questions, if I do so, I risk  
 23 losing their representation.  
 24 Q. What did your lawyer tell you in that regard?  
 25 MR. PIKE: I'm going to instruct you not to

1 answer that question. Attorney/client.  
 2 BY MR. SCAROLA:  
 3 Q. Well, didn't you just tell me that your lawyer  
 4 advised you that if you answered questions he wouldn't  
 5 represent you anymore?  
 6 MR. PIKE: That's exactly what he said,  
 7 Mr. Scarola, and I'm instructing him not to answer  
 8 the question.  
 9 BY MR. SCAROLA:  
 10 Q. Okay. So I want to know then -- I want to  
 11 know what your lawyer told you about that.  
 12 MR. PIKE: I'm going to instruct you not to  
 13 answer that question. Attorney/client.  
 14 MR. SCAROLA: And it is our contention,  
 15 obviously, that by making the statement that he has  
 16 made, Mr. Epstein has waived any attorney/client  
 17 privilege with regard to that matter.  
 18 MR. PIKE: Your contention, definitely not  
 19 mine.  
 20 BY MR. SCAROLA:  
 21 Q. Mr. Epstein, who else has shared that  
 22 residence with you at any time over the course of the  
 23 last five years?  
 24 A. Again, Mr. Scarola, I'd like to answer that  
 25 question, as I'd like to answer each and every one of

1 your questions here today. However, on advice of  
 2 Counsel, I'm going to have to assert my Fifth, Sixth and  
 3 14th Amendment Right.  
 4 Q. Are you a Plaintiff in a lawsuit against Scott  
 5 Rothstein, Bradley J. Edwards and an individual  
 6 identified by the initials [REDACTED]?  
 7 A. Yes, sir, I am.  
 8 Q. Who is the individual identified as [REDACTED]?  
 9 A. I believe from depositions that I've read, her  
 10 full name is [REDACTED].  
 11 Q. When and under what circumstances did you  
 12 first meet the individual referenced by the initials  
 13 [REDACTED]?  
 14 A. Mr. Scarola, I think you are aware these  
 15 questions are simply designed to have me invoke my Fifth  
 16 Amendment, Sixth Amendment and 14th Amendment Right in  
 17 relation to other questions and other cases filed.  
 18 But in response to your question, I'm going to  
 19 have to invoke my right not to testify.  
 20 Q. Do you know the individual named [REDACTED],  
 21 identified by the initials [REDACTED]?  
 22 A. Mr. Scarola, at least today -- I would like to  
 23 answer that question; however, today, on advice of  
 24 Counsel, I'm going to have to refuse to answer that  
 25 question.

1 Q. Have you ever acknowledged in the presence of  
 2 any other person knowing the individual identified by  
 3 the initials [REDACTED]?  
 4 MR. PIKE: Form.  
 5 THE WITNESS: Again? Sorry. Can you repeat  
 6 the question, sir?  
 7 BY MR. SCAROLA:  
 8 Q. Yes, sir. Have you ever acknowledged in the  
 9 presence of any other person knowing the individual  
 10 identified by the initials [REDACTED]?  
 11 MR. PIKE: Form. Also could invade  
 12 attorney/client.  
 13 THE WITNESS: Again, I would like to answer  
 14 that question, but today I'm going to have to  
 15 invoke my Fifth Amendment, Sixth Amendment and 14th  
 16 Amendment Right.  
 17 BY MR. SCAROLA:  
 18 Q. Have you ever acknowledged in the presence of  
 19 any person, other than your own lawyer, having known the  
 20 individual identified by the initials [REDACTED]?  
 21 MR. PIKE: Form.  
 22 THE WITNESS: Again, I'd like to answer each  
 23 and every one of your questions here today,  
 24 Mr. Scarola; however, on advice of Counsel, at  
 25 least today, I'm going to have to refuse to answer

1 that question.  
 2 BY MR. SCAROLA:  
 3 Q. Have you ever acknowledged to --  
 4 A. Excuse me.  
 5 Q. -- Bradley --  
 6 A. Sir, may I suggest that if I say I refuse to  
 7 answer, that it means the Fifth, Sixth and 14th or would  
 8 you prefer that I recite it each time?  
 9 Q. I would prefer that you answer the questions,  
 10 that's my preference. But if you're going to assert a  
 11 privilege, I will assume that if you simply say that you  
 12 are refusing to answer, your refusal to answer will be  
 13 on the basis of various Constitutional privileges  
 14 against self-incrimination without the necessity of  
 15 specifying.  
 16 If your refusal to answer is on the basis of  
 17 any other privilege, it will be necessary for you to  
 18 identify that privilege.  
 19 A. Thank you.  
 20 MR. PIKE: And I'm going to instruct you, too,  
 21 when you do invoke, invoke the Fifth, Sixth and the  
 22 14th.  
 23 THE WITNESS: Yes.  
 24 BY MR. SCAROLA:  
 25 Q. Have you ever acknowledged in the presence of

1 invoke my Fifth, Sixth and 14th Amendment Right.  
 2 Q. Have you ever acknowledged in the presence of  
 3 Terri Becker, a court reporter present at a deposition  
 4 taken by Brad Edwards in a -- in a case in which the  
 5 individual identified by the initials [REDACTED] was a  
 6 Plaintiff that you knew and/or liked --  
 7 MR. PIKE: Form.  
 8 THE WITNESS: Again, --  
 9 BY MR. SCAROLA:  
 10 Q. -- [REDACTED]?  
 11 MR. PIKE: Same objection.  
 12 THE WITNESS: Again, I'm going to have to  
 13 assert my Fifth, Sixth and 14th Amendment Right.  
 14 BY MR. SCAROLA:  
 15 Q. Have you ever acknowledged in the presence of  
 16 Steve Jaffe that you knew and/or liked [REDACTED]?  
 17 A. Again, Mr. Scarola, though I'd like to answer  
 18 each and every one of your questions today, I'm going to  
 19 have to, at the advice of Counsel, invoke my Fifth,  
 20 Sixth and 14th Amendment Right.  
 21 Q. Why are you suing [REDACTED]?  
 22 MR. PIKE: Form.  
 23 MR. SCAROLA: Let me state for the record that  
 24 I don't consider a form objection to be a proper  
 25 objection, unless you specify the defect in the

1 Bradley J. Edwards that you knew the individual  
 2 identified by the initials [REDACTED]?  
 3 A. I'm going to have to refuse to answer that  
 4 question.  
 5 Q. Have you ever acknowledged in the presence of  
 6 Bradley J. Edwards that you knew [REDACTED]?  
 7 MR. PIKE: Again, for purposes of the record,  
 8 I'm instructing you to invoke the Fifth, Sixth and  
 9 14th, rather than just simply say --  
 10 THE WITNESS: Okay.  
 11 MR. PIKE: -- I refuse to answer. I want it  
 12 to be clear for the Court that you have invoked  
 13 your Fifth, Sixth and 14th.  
 14 THE WITNESS: Fine.  
 15 Then on advice of Counsel, I'm going to have  
 16 to invoke my Fifth, Sixth and 14th Amendment Right.  
 17 BY MR. SCAROLA:  
 18 Q. Have you ever acknowledged in Brad Edwards'  
 19 presence that you liked the individual identified by the  
 20 initials [REDACTED]?  
 21 A. Again, I'm going to have to invoke my Fifth,  
 22 Sixth and 14th Amendment Right, Mr. Scarola.  
 23 Q. Have you ever acknowledged in Bradley Edwards'  
 24 presence that you liked [REDACTED]?  
 25 A. Again, Mr. Scarola, I'm going to have to

1 form and provide me with an opportunity to correct  
 2 the defect.  
 3 MR. PIKE: That's fine. I believe the rules  
 4 provide otherwise. But, nonetheless, I stand on my  
 5 objection to form.  
 6 THE WITNESS: I'm sorry. You have to repeat  
 7 the question.  
 8 BY MR. SCAROLA:  
 9 Q. Why are you suing [REDACTED]?  
 10 MR. PIKE: Form.  
 11 THE WITNESS: [REDACTED] is part of a conspiracy  
 12 with Scott Rothstein, Bradley Edwards, creating --  
 13 excuse me -- creating fraudulent cases of a  
 14 sexually charged nature in which the U.S. Attorney  
 15 has already charged the firm of Rothstein, a firm  
 16 of which Bradley Edwards is a partner, was a  
 17 partner, with creating, fabricating malicious cases  
 18 of a sexual nature, including cases with respect to  
 19 me, specifically, in order to fleece unsuspecting  
 20 investors in South Florida out of millions of  
 21 dollars.  
 22 BY MR. SCAROLA:  
 23 Q. What role do you contend [REDACTED] played in that  
 24 conspiracy to create fraudulent cases?  
 25 A. [REDACTED]'s testimony before she met Mr. Edwards

1 was dramatically -- sworn testimony to the FBI was  
2 dramatically different after she came in contact with  
3 Mr. Bradley Edwards, where her testimony then changed to  
4 sort of a hostile and had claims of -- claims never made  
5 before, never made to anyone before, and allegations  
6 that I've read in her Complaint that that had been  
7 dramatically different from the ones she had spoken to  
8 the FBI about, sir.

9 Q. Is it your contention that [REDACTED]'s statement to  
10 the FBI was true?

11 MR. PIKE: Form.

12 THE WITNESS: Mr. Scarola, unfortunately,  
13 today with respect to that question, I'm going to  
14 have to assert my Fifth, Sixth and 14th Amendment  
15 Right. Though I know -- I believe you know the  
16 answer to that question, I can't answer the  
17 question under advice of Counsel. And he's told me  
18 if I chose to do so, I risk losing his  
19 representation.

20 BY MR. SCAROLA:

21 Q. What is the basis of your belief that I know  
22 the answer to the question?

23 MR. PIKE: Form.

24 THE WITNESS: You -- I believe you have seen  
25 this, because you're supposed to be a decent

1 according to you, she met Mr. Edwards and changed her  
2 testimony, true?

3 A. Did she change her testimony? Is that -- yes,  
4 her testimony was changed.

5 Q. My question to you is: Was her testimony  
6 which you contend was changed true testimony?

7 A. Your question is not a good question. Is it  
8 her testimony before or after?

9 Q. Was the subsequent testimony given by [REDACTED]  
10 after she met Mr. Edwards which you contend was  
11 different from her testimony before the FBI, was the  
12 subsequent testimony true or false?

13 MR. PIKE: Form.

14 THE WITNESS: Sir, I'm going, at least today,  
15 I'm going to have to assert my Fifth, Sixth and  
16 14th Amendment Right.

17 BY MR. SCAROLA:

18 Q. Did you ever engage in any sexual conduct with  
19 [REDACTED]?

20 A. I would like to answer that question, but --

21 Q. You don't need to tell me what you'd like to  
22 do, Mr. Epstein. You just need to do it, please.

23 THE WITNESS: Please --

24 MR. PIKE: Mr. Scarola, please let the witness  
25 finish his response.

1 lawyer, you've read the testimony. I would guess  
2 you've read the difference in her testimony to the  
3 FBI versus her testimony after she's met your  
4 client and his partners, who are currently in jail.

5 BY MR. SCAROLA:

6 Q. How does that respond to my question as to  
7 whether you contend that her testimony to the FBI was  
8 true or false?

9 MR. PIKE: Form.

10 THE WITNESS: I don't believe that was your  
11 question. Will you repeat?

12 BY MR. SCAROLA:

13 Q. Okay. Well, let's -- let me rephrase the  
14 question then.

15 Is it your contention that [REDACTED]'s statement to  
16 the FBI was true?

17 A. Sir, on advice of Counsel, at least today, I'm  
18 going to have to assert my Fifth, Sixth and 14th  
19 Amendment Right.

20 Q. Was [REDACTED]'s statement to the FBI false in any  
21 respect?

22 A. Sir, at least, again, today, on advice of  
23 Counsel, I'm going to have to assert my Fifth, Sixth and  
24 14th Amendment Right.

25 Q. Was [REDACTED]'s subsequent testimony after,

1 MR. SCAROLA: That's not a response to my  
2 question.

3 MR. PIKE: In your mind it may not be a  
4 response. In a Judge's mind, it may be. We may  
5 have to certify it to the Court. If such a  
6 procedure even exists, we can take it up with the  
7 Court. But please let the witness finish his  
8 response.

9 THE WITNESS: Again, please?

10 BY MR. SCAROLA:

11 Q. Did you engage -- ever engage in any sexual  
12 conduct with [REDACTED]?

13 A. I would like to answer that question; however,  
14 today I'm going to have to assert my rights as provided  
15 by the Fifth, Sixth and 14th Amendment to that question,  
16 sir.

17 Q. Have you ever exchanged anything of value with  
18 [REDACTED]?

19 MR. PIKE: Form.

20 THE WITNESS: At least today, I'm going to  
21 have to assert my Fifth, Sixth and 14th Amendment  
22 Right, sir.

23 BY MR. SCAROLA:

24 Q. Did you ever direct anyone to deliver anything  
25 of value to [REDACTED]?

1 MR. PIKE: Form.  
 2 THE WITNESS: At least today, I'm going to  
 3 have to refuse to answer that question based on the  
 4 Fifth, Sixth and 14th Amendment.  
 5 BY MR. SCAROLA:  
 6 Q. Do you know [REDACTED]?  
 7 A. At least today, sir, I'm going to have to  
 8 refuse to testify about that question. Based on advice  
 9 of Counsel, I'm going to have to assert my Fifth, Sixth  
 10 and 14th Amendment Right.  
 11 Q. Did [REDACTED] introduce you to [REDACTED]?  
 12 A. Sir, respectfully, I'd like to answer that  
 13 question today. As I said, I'd like to answer each and  
 14 every one of your questions. However, on advice of my  
 15 Counsel today, I'm going to have to assert my Fifth,  
 16 Sixth and 14th Amendment Right.  
 17 Q. Did [REDACTED] suffer any damage as a consequence of  
 18 any interaction between you and [REDACTED]?  
 19 MR. PIKE: Form.  
 20 THE WITNESS: Could you repeat the question,  
 21 please?  
 22 BY MR. SCAROLA:  
 23 Q. Did [REDACTED] suffer any damage as a consequence of  
 24 any interaction between you and [REDACTED]?  
 25 MR. PIKE: Form.

1 THE WITNESS: I'd like to answer each and  
 2 every one of your questions here today,  
 3 Mr. Scarola; however, on advice of Counsel, today,  
 4 I'm going to have to assert my Fifth, Sixth and  
 5 14th Amendment Right.  
 6 BY MR. SCAROLA:  
 7 Q. Your Complaint in this action alleges that  
 8 [REDACTED] made claims for damages out of proportion to her  
 9 alleged damages. What does that mean?  
 10 A. It means what it says.  
 11 Q. I don't understand it. Explain it to me.  
 12 MR. PIKE: To the extent you can answer that  
 13 question without disclosing my conversations with  
 14 you or Mr. Critton's conversations with you, as  
 15 well as my work product, you can answer the  
 16 question.  
 17 THE WITNESS: I believe that as part of the  
 18 scheme to defraud investors in South Florida out of  
 19 millions of dollars, claims of outrageous sums of  
 20 money were made on behalf of alleged victims across  
 21 the board. And the only way -- in fact, Scott  
 22 Rothstein sits in jail. And what I've read in the  
 23 paper, claims that I've settled cases for  
 24 \$200-million, which is totally not true.  
 25 She has made claims of serious sum of money,

1 which is outrageous.  
 2 BY MR. SCAROLA:  
 3 Q. How much have you settled claims for?  
 4 MR. PIKE: I'm going to instruct you not to  
 5 answer that question.  
 6 MR. SCAROLA: And the basis of that  
 7 instruction is?  
 8 MR. PIKE: Confidential settlement agreements,  
 9 to the extent that they exist. And the terms would  
 10 be confidential.  
 11 BY MR. SCAROLA:  
 12 Q. Have you settled claims?  
 13 A. Yes, I have.  
 14 Q. What is the nature of the claims you settled?  
 15 MR. PIKE: I'm going to instruct you not to  
 16 answer that question.  
 17 BY MR. SCAROLA:  
 18 Q. How many claims have you settled?  
 19 MR. PIKE: I'm going to instruct you not to  
 20 answer that question as well.  
 21 MR. SCAROLA: What is the basis for those  
 22 instructions?  
 23 MR. PIKE: Confidential, as well as there is a  
 24 Victim's Right Statute that may -- you may be  
 25 tiptoeing into the identity of --

1 MR. SCAROLA: I'm not tiptoeing anywhere.  
 2 MR. PIKE: Let me finish my objection,  
 3 Mr. Scarola.  
 4 You may be tiptoeing into the identity of  
 5 various alleged victims underneath the Victims  
 6 Right Statute, as well as ongoing investigations or  
 7 past investigations that have remained open with  
 8 the State, as well as the Federal Government.  
 9 So in that regard, we would have to put the  
 10 State Attorney, as well as the Federal Government  
 11 on notice that you were seeking to potentially back  
 12 door certain identities at this deposition.  
 13 BY MR. SCAROLA:  
 14 Q. Other than having allegedly given different  
 15 testimony before she met Mr. Edwards then given after  
 16 she met Mr. Edwards, did [REDACTED] do anything else that  
 17 forms the basis for your claim against her?  
 18 MR. PIKE: Form. Asked and answered.  
 19 THE WITNESS: I'd like to answer that  
 20 question, as well as every one of your questions  
 21 with respect to [REDACTED] here today; however, on advice  
 22 of Counsel, at least today, Mr. Scarola, I'm going  
 23 to have to assert my Sixth Amendment, Fifth  
 24 Amendment and 14th Amendment Right.  
 25 BY MR. SCAROLA:

1 Q. Did [REDACTED] fail to do anything that she had an  
2 obligation, duty or responsibility to do --

3 MR. PIKE: Form.

4 BY MR. SCAROLA:

5 Q. -- that forms the basis for your claim against  
6 her?

7 MR. PIKE: I apologize. Form.

8 THE WITNESS: Again? I'm sorry. Has she  
9 failed to do? Can you repeat?

10 BY MR. SCAROLA:

11 Q. Yes, sir. Lawsuits are generally based, civil  
12 lawsuits are generally based on a claim that someone has  
13 done something that they shouldn't have done or failed  
14 to do something that they should have done.

15 I asked you whether [REDACTED] did anything that she  
16 shouldn't have done and you asserted a Fifth Amendment  
17 privilege in refusing to answer that question.

18 I'm now attempting to find out whether [REDACTED]  
19 failed to do something that she should have done that  
20 forms the basis of your claims against her.

21 Did [REDACTED] do anything that she should have done  
22 that forms the basis of your claims against her?

23 MR. PIKE: Form.

24 THE WITNESS: On advice of Counsel, at least  
25 today, Mr. Scarola, I'm going to have to refuse to

1 MR. PIKE: Mr. Scarola, that's the second time  
2 that I'm going to ask you not to interrupt the  
3 witness when he's giving a response. He is giving  
4 a response. When he finishes his response, you can  
5 go on with your next question or you can -- you can  
6 elicit any sort of information you intend to elicit  
7 from the witness.

8 MR. SCAROLA: He's being unresponsive.

9 MR. PIKE: No, that's your contention.

10 MR. SCAROLA: No, that's a fact.

11 MR. PIKE: And you can take it up with a  
12 Judge. And if we want to continue going back and  
13 forth and bantering, not allowing the witness to  
14 answer the question -- we're here for you today,  
15 for you to ask the questions and for you to get  
16 answers. But if you continue to banter with the  
17 witness and interrupt the witness, I will adjourn  
18 the deposition. This is not proper and we  
19 certainly can take it up with the Judge. So that's  
20 the second warning, Mr. Scarola. Please --

21 MR. SCAROLA: How many do I get?

22 MR. PIKE: I'm not sure yet today.

23 MR. SCAROLA: Okay.

24 MR. PIKE: Okay?

25 MR. SCAROLA: Good. Then let's move on.

1 answer that question based on my Fifth Amendment,  
2 Sixth Amendment and 14th Amendment Right.

3 BY MR. SCAROLA:

4 Q. Did Brad Edwards do anything that he shouldn't  
5 have done that forms the basis of your lawsuit against  
6 him?

7 MR. PIKE: Form.

8 THE WITNESS: Yes, many things.

9 BY MR. SCAROLA:

10 Q. List them for me, please.

11 A. He has -- he has gone to the media out of, I  
12 believe, in an attempt to gin up these allegations. He  
13 has contacted the media. He has used the media for his  
14 own purposes. He has brought discovery -- he has  
15 engaged in discovery proceedings that bear no  
16 relationship to any case filed against me by any of his  
17 clients.

18 His firm, which he's the partner of, has been  
19 accused of forging a Federal Judge's signature.

20 Q. I want to know what Mr. Edwards --

21 MR. PIKE: One second.

22 THE WITNESS: Excuse me. I'm answering.

23 BY MR. SCAROLA:

24 Q. I want to know what Mr. Edwards did. I'm not  
25 asking you about allegations concerning his law firm.

1 MR. PIKE: But I can tell you one thing: On a  
2 professional nature, just because you are  
3 interrupting the witness and bantering with me, I  
4 will adjourn the deposition.

5 BY MR. SCAROLA:

6 Q. Besides having gone to the media in an attempt  
7 to, quote, gin up, unquote, these allegations and  
8 engaged in what you contend to be irrelevant discovery  
9 proceedings, what else did Mr. Edwards, personally, do  
10 that forms the basis for this lawsuit?

11 A. Mr. Edwards, personally, engaged with his  
12 partners, Scott Rothstein, who sits in a Federal jail  
13 cell, potentially for the rest of his life, he shared  
14 information, what I've been told and -- excuse me --  
15 what I've read in the newspapers, 13 boxes of  
16 information that had my name on it, with other attorneys  
17 at his firm.

18 He counseled his clients to maintain a  
19 position alleging multi-million dollar damages in order  
20 for them to scam local investors out of millions of  
21 dollars.

22 He and his -- many of his other partners  
23 already under investigation by the FBI and the U.S.  
24 Attorney have been accused by the U.S. Attorney of  
25 running a criminal enterprise.

1 Q. Anything else?  
 2 MR. PIKE: Form.  
 3 THE WITNESS: Not I can think of at the  
 4 moment.  
 5 BY MR. SCAROLA:  
 6 Q. Okay. What media did Mr. Edwards go to?  
 7 A. I am aware of at least the Daily News in New  
 8 York City.  
 9 I have been told by other people that there  
 10 were other media, local media.  
 11 I've been told that the -- his investigator  
 12 was sent to California to harass people representing  
 13 his -- Brad Edwards' investigator -- representing  
 14 fictitiously, fraudulently that he was a FBI agent to  
 15 try to gather information for Mr. Edwards' claims.  
 16 Q. Does that have something to do with going to  
 17 the media?  
 18 MR. PIKE: Form.  
 19 THE WITNESS: I've answered your question.  
 20 BY MR. SCAROLA:  
 21 Q. Does the investigator going to California to  
 22 do something have something to do with the media?  
 23 A. I believe I've also told that you that he's  
 24 gone to the Daily News, sir; is that correct?  
 25 MR. PIKE: Form. Mischaracterizes the

1 Q. Do you understand the question you're supposed  
 2 to be answering, Mr. Epstein?  
 3 MR. PIKE: And I'm going to instruct you not  
 4 to answer that question right now because as your  
 5 Counsel I cannot let you answer that question until  
 6 I understand what question is on the table.  
 7 There's been a lot of bantering back and  
 8 forth, so, Mr. Scarola, if you would respectfully  
 9 repeat the question and then you may be able to ask  
 10 him whether or not he understands the question.  
 11 But I cannot allow him to answer a question that I  
 12 don't understand is on the table.  
 13 BY MR. SCAROLA:  
 14 Q. What does an investigator going to California  
 15 have to do with Mr. Edwards allegedly going to the media  
 16 in an attempt to, quote, gin up, unquote, these  
 17 allegations?  
 18 MR. PIKE: Please answer the question.  
 19 THE WITNESS: Good. It's part of Mr. Edwards'  
 20 scheme to involve people who have nothing to do  
 21 with any of his cases in order to, in fact, go back  
 22 to the media and gin up his stories and make false  
 23 allegations of people that have sexually charged  
 24 nature cases in order to attempt to fleece  
 25 investors, local investors out of millions of

1 witness' testimony as well.  
 2 BY MR. SCAROLA:  
 3 Q. Do you understand the question that you're  
 4 supposed to be answering?  
 5 MR. PIKE: Well, let's go ahead and repeat it.  
 6 MR. SCAROLA: No, let's get an -- let's get an  
 7 answer to that question.  
 8 BY MR. SCAROLA:  
 9 Q. Do you understand the question you're supposed  
 10 to be answering?  
 11 A. When --  
 12 MR. PIKE: I'm confused. Wait one second.  
 13 THE WITNESS: Sorry.  
 14 MR. PIKE: I'm confused as to what question is  
 15 on the table.  
 16 MR. SCAROLA: And when your deposition is  
 17 being taken, your confusion is relevant and  
 18 material.  
 19 MR. PIKE: Right. And it's --  
 20 MR. SCAROLA: When Mr. Edwards' -- excuse  
 21 me -- when Mr. Epstein's deposition is being taken,  
 22 I'm concerned with whether he understands the  
 23 question being asked.  
 24 MR. PIKE: Right. So...  
 25 BY MR. SCAROLA:

1 dollars.  
 2 His firm has been accused by the U.S. Attorney  
 3 of manipulating the media, by hiring investigators,  
 4 by illegal wire taps, by illegal methods of  
 5 eavesdropping in order to go to the media and  
 6 generate cases.  
 7 BY MR. SCAROLA:  
 8 Q. When did Mr. Edwards go to the Daily News?  
 9 A. I don't know.  
 10 Q. How did he go to the Daily News?  
 11 A. I don't know.  
 12 Q. What did he say to the Daily News?  
 13 A. I believe Mr. Edwards knows that. I don't  
 14 know exactly what he said.  
 15 Q. What is the source of your information that he  
 16 went to the Daily News at all, ever?  
 17 MR. PIKE: To the extent you can answer that  
 18 question without violating any attorney/client  
 19 privileges, you can answer the questions.  
 20 THE WITNESS: It's attorney/client.  
 21 BY MR. SCAROLA:  
 22 Q. You said you were told by other people that he  
 23 went to other media representatives?  
 24 A. Yes, sir.  
 25 Q. Who are the other people that told you that?

1 A. I don't recall at the moment.  
 2 Q. What did these other people who you don't  
 3 remember tell you Mr. Edwards did with respect to other  
 4 media representatives besides the Daily News?  
 5 A. Again, the question again?  
 6 Q. What did these other people tell you  
 7 Mr. Edwards did with respect to going to other media?  
 8 MR. PIKE: Form.  
 9 THE WITNESS: Mr. Edwards went to the media to  
 10 gin up his cases in order that the Rothstein firm  
 11 could generate profits, falsely taking in  
 12 investors, creating false stories to the local  
 13 medias and making statements to local press  
 14 regarding false claims made by his clients in order  
 15 that Scott Rothstein, who currently sits in jail,  
 16 could defraud, along with his other partners of his  
 17 firm, local Florida investors, Mr. Scarola, out of  
 18 millions of dollars.  
 19 BY MR. SCAROLA:  
 20 Q. When did these other people whose identity you  
 21 can't remember tell you these things that Brad Edwards  
 22 did?  
 23 A. Sometime in the past year.  
 24 Q. How many other people were there who told you  
 25 these things about Mr. Edwards?

1 themselves or were these anonymous callers?  
 2 MR. PIKE: Form.  
 3 THE WITNESS: Sitting here today, Mr. Scarola,  
 4 I don't recall with specificity.  
 5 BY MR. SCAROLA:  
 6 Q. What specifically did Mr. Edwards allegedly  
 7 communicate to the Daily News to, quote, gin up these  
 8 allegations, unquote?  
 9 A. The newspapers have quoted Mr. Edwards -- not  
 10 quoted Mr. -- newspapers have made allegations referred  
 11 to as Mr. Edwards' statements.  
 12 MR. SCAROLA: Would you read the question  
 13 back, please, Sandy?  
 14 (Pending question was read.)  
 15 MR. PIKE: Did he answer your question?  
 16 MR. SCAROLA: No.  
 17 MR. PIKE: Are you asking him again?  
 18 THE WITNESS: So you're asking the question  
 19 again?  
 20 BY MR. SCAROLA:  
 21 Q. Yes.  
 22 THE WITNESS: Sorry. Could you repeat the  
 23 question again?  
 24 (Pending question was read.)  
 25 THE WITNESS: He alleged that third parties

1 A. I don't recall with specificity.  
 2 Q. Well, do you recall in any degree how many  
 3 there were?  
 4 A. I would say, probably five to ten.  
 5 Q. Where were you when these conversations took  
 6 place that you can't -- the identity of whose  
 7 participants you can't remember?  
 8 MR. PIKE: So we're clear, within the last  
 9 year -- correct? -- timewise?  
 10 MR. SCAROLA: Well, that's what your client  
 11 said. I don't believe a word he says, but that's  
 12 what he said.  
 13 MR. PIKE: Form. Objection. Overbroad.  
 14 THE WITNESS: Again, sir?  
 15 BY MR. SCAROLA:  
 16 Q. Yes, sir. Where did these conversations with  
 17 these five to ten people take place whose identity you  
 18 can't remember?  
 19 MR. PIKE: Form.  
 20 THE WITNESS: On the telephone.  
 21 BY MR. SCAROLA:  
 22 Q. Who initiated the phone calls?  
 23 A. Sir, these questions, I have no -- I don't  
 24 have any recollection.  
 25 Q. Did the people who were on the phone identify

1 had already been involved in some allegations to do  
 2 with sexual misconduct.  
 3 BY MR. SCAROLA:  
 4 Q. Which third parties?  
 5 A. I don't recall sitting here today.  
 6 Q. Involved how?  
 7 MR. PIKE: Form.  
 8 THE WITNESS: If I recall with specificity, if  
 9 I had the articles in front of me, I would be able  
 10 to recall. Maybe next time.  
 11 BY MR. SCAROLA:  
 12 Q. What does "gin up these allegations" mean?  
 13 MR. PIKE: Form.  
 14 THE WITNESS: It means craft allegations of  
 15 multi-million dollar cases; in fact, alleging in  
 16 [REDACTED]'s case damages of \$50-million, settlements in  
 17 order for Scott Rothstein and the rest of  
 18 Mr. Edwards' partners to fleece unsuspecting  
 19 investors out of millions and millions of dollars  
 20 based on cases that didn't exist or alleged cases  
 21 that I had settled.  
 22 Can I take a break?  
 23 VIDEOGRAPHER: Going off video record, 10:50.  
 24 (Brief recess.)  
 25 VIDEOGRAPHER: We're now on video record at

1 10:57 a.m.  
 2 BY MR. SCAROLA:  
 3 Q. Was your reference to, quote, gin up these  
 4 allegations, unquote, a reference to allegations made  
 5 against you?  
 6 MR. PIKE: Form.  
 7 THE WITNESS: As part of the vast conspiracy  
 8 of the Rothstein firm and Mr. Edwards'  
 9 participation in it, it has been alleged that many  
 10 cases were fraudulently brought -- alleged that  
 11 have been brought; ginned up, meaning, crafted,  
 12 multi-million dollar numbers put on cases in order  
 13 to fleece investors, where his partner, Scott  
 14 Rothstein, currently sits in jail for just those  
 15 purposes, Mr. Scarola.  
 16 BY MR. SCAROLA:  
 17 Q. My question to you is: Did the reference to,  
 18 quote, gin up these allegations refer to allegations  
 19 against you?  
 20 A. Reported in the newspaper the answer is, yes.  
 21 And others, but specifically me, yes, by the newspaper  
 22 reports.  
 23 Q. Specifically what are the allegations against  
 24 you which you contend Mr. Edwards ginned up?  
 25 A. I would like to answer that question. A, many

1 Q. I want to know whether when you use the phrase  
 2 "gin up" and the word "crafted," which you have told us  
 3 is synonymous with gin up, --  
 4 A. Yes.  
 5 Q. -- you mean fabricated?  
 6 A. I'm sorry. On advice of Counsel, sir, and  
 7 I've answered that question before, but if you didn't  
 8 hear me the first time, I must assert my Fifth, Sixth  
 9 and 14th Amendment Right.  
 10 Q. What specific discovery proceedings did  
 11 Mr. Edwards engage in which you contend form the basis  
 12 for your lawsuit?  
 13 A. The discovery proceedings of bringing my  
 14 attorneys to various people that had nothing to do with  
 15 any of his clients or these lawsuits.  
 16 Q. Which various people? Who?  
 17 MR. PIKE: Form.  
 18 THE WITNESS: For example, he tried to depose  
 19 Bill Clinton, strictly as a means of getting  
 20 publicity so that he and his firm could  
 21 fraudulently steal, craft money from unsuspecting  
 22 investors in South Florida out of millions of  
 23 dollars.  
 24 BY MR. SCAROLA:  
 25 Q. Who else besides Bill Clinton is included in

1 of the files and documents that we've requested from  
 2 Mr. Edwards and the Rothstein firm are still  
 3 unavailable.  
 4 With respect to anything that I can point to  
 5 today, I'm, unfortunately, going to have to take the  
 6 Fifth Amendment on that, Sixth and 14th.  
 7 Q. You seemed to be defining ginned up as  
 8 crafted; is that correct?  
 9 A. That's correct.  
 10 Q. Does ginned up or crafted mean fabricated?  
 11 MR. PIKE: Form.  
 12 THE WITNESS: I'm sorry, Mr. Scarola. I  
 13 understand that you are trying to back door your  
 14 way into a waiver of my Fifth Amendment. But  
 15 respect to that question, I'm going to have assert  
 16 my Fifth Amendment, Sixth Amendment and 14th  
 17 Amendment Right.  
 18 BY MR. SCAROLA:  
 19 Q. So you are asserting your Fifth Amendment,  
 20 Sixth Amendment and 14th Amendment Right to remain  
 21 silent about what you mean when you use the words "gin  
 22 up" and "crafted;" is that correct?  
 23 A. I don't believe that was your question.  
 24 Q. Yes, sir, that's exactly my question.  
 25 A. Would you repeat the question for me?

1 your reference to various people?  
 2 A. There are people in California. There are  
 3 people in New York.  
 4 Q. Would you name them for us, please?  
 5 A. I'm sorry. Sitting here today, Mr. Scarola,  
 6 I'm going to have to assert my Fifth Amendment, Sixth  
 7 Amendment and 14th Amendment Right.  
 8 Q. Let's then talk about Bill Clinton, by whom I  
 9 assume you mean former President Clinton; is that  
 10 correct?  
 11 A. That's correct.  
 12 Q. All right. Do you know former President  
 13 Clinton personally?  
 14 A. I'm sorry. As I sit here today, though I'd  
 15 like to answer that question, on advice of my Counsel,  
 16 at least today, I'm going to have to take the Fifth,  
 17 Sixth and 14th Amendment.  
 18 Q. You said something about Mr. Edwards sharing  
 19 13 boxes of information with somebody --  
 20 A. Yes.  
 21 Q. -- as forming part of the basis for your  
 22 lawsuit against Mr. Edwards, correct?  
 23 A. Correct.  
 24 Q. All right. With whom did Mr. Edwards share  
 25 these 13 boxes of information?

1 A. It has been reported in the Scherer Complaint  
2 that he shared those boxes with the partners of his firm  
3 that was then formally accused by the U.S. Attorney,  
4 sir, of being a criminal enterprise.

5 MR. PIKE: And just for purposes --  
6 BY MR. SCAROLA:

7 Q. Do you remember my question?  
8 A. You asked me who he shared it with?  
9 Q. Yes.  
10 A. The partners of his firm, sir.

11 Q. Okay. So part of the basis of your lawsuit is  
12 that Mr. Edwards allowed members of his own law firm to  
13 see 13 boxes of information; is that correct?

14 A. No, that's not correct. My claim is that the  
15 13 boxes of information that were shown to investors by  
16 Mr. Edwards' partners, 13 boxes that we've been told by  
17 the press contain multiple cases, fraudulently -- and if  
18 you like the word -- fabricated in order to fleece  
19 investors out of money. The 13 boxes were shared with  
20 investors, Mr. Edwards, Mr. Edwards' partners and some  
21 of those partners currently under inditement, the others  
22 already sitting in jail.

23 Q. I had asked you earlier whether ginned up and  
24 crafted meant fabricated and you asserted your Fifth  
25 Amendment privilege.

1 Amendment Right, sir.

2 Q. Your Complaint also makes reference to a claim  
3 on behalf of Jane Doe, referred to as Jane Doe versus  
4 Epstein, case number 08-CIV-80893, a case pending in the  
5 United States District Court for the Southern District  
6 of Florida.

7 Is it your contention that the claim on behalf  
8 of Jane Doe is a fabricated claim?

9 A. Sir, though I'd like to answer that question,  
10 as well as every one of your other questions here today,  
11 today I'm going to have to assert my rights as under the  
12 Constitution of the Fifth, Sixth and 14th Amendment.

13 Q. Do you know the real name of the person  
14 referred to as Jane Doe in that case?

15 A. I don't know which -- I'm sorry, sir. I do  
16 not, sitting here today.

17 Q. Did you ever have personal contact with the  
18 person referred to by the name Jane Doe in that lawsuit?

19 A. I'm sorry, sir. Sitting here today, I'm going  
20 to have to assert my Fifth, Sixth and 14th Amendment  
21 Right.

22 Q. When did you first meet the person referred to  
23 as Jane Doe?

24 A. Sir, though I'd like to answer each and every  
25 one of your questions here today, at least with respect

1 Are you now telling us that there were claims  
2 against you that were fabricated by Mr. Edwards?

3 A. I'm going to again assert my Fifth, Sixth and  
4 14th Amendment Right, sir.

5 I would respond that the newspapers are very  
6 clear that the cases were fabricated.

7 Q. Which newspaper said which case was  
8 fabricated?

9 A. Bob Norman's blog said most of the cases were  
10 fabricated, to my best recollection.

11 The Scherer Complaint alleged many fabricated  
12 cases, sir.

13 Q. Well, which of Mr. Edwards' cases do you  
14 contend were fabricated?

15 A. Again, we've requested most of the --  
16 information from the bankruptcy trustee. We've been  
17 unable -- Mr. Edwards has not given us the total file,  
18 but respect to any individual, I would have -- at the  
19 moment I would have to assert my Fifth, Sixth and 14th  
20 Amendment claim, sir.

21 Q. So you will not answer questions about whether  
22 the claim on behalf of [REDACTED] was fabricated; is that  
23 correct?

24 A. I believe I've already answered that, but, if  
25 again, I'll have to assert my Fifth, Sixth and 14th

1 to that question, I'm going to have to assert my rights  
2 under the Sixth Amendment, 14th Amendment and Fifth  
3 Amendment.

4 Q. Where did you first meet the person referred  
5 to as Jane Doe?

6 A. Sir, though I'd like to answer that question  
7 here today, at least today on advice of Counsel, I'm  
8 going to have to assert my Fifth Amendment, Sixth  
9 Amendment and 14th Amendment Right.

10 Q. How many times have you been in the physical  
11 presence of the person referred to as Jane Doe?

12 A. The person referred to as Jane Doe?

13 Q. Yeah. How many times have you been in her  
14 physical presence?

15 MR. PIKE: Form.

16 THE WITNESS: At least -- at least sitting  
17 here today, Mr. Scarola, I'm going to have to  
18 assert my Fifth Amendment, Sixth Amendment and 14th  
19 Amendment Right.

20 BY MR. SCAROLA:

21 Q. Did you ever have any physical contact with  
22 Jane Doe?

23 MR. PIKE: Form.

24 THE WITNESS: Now, for this purposes, you're  
25 assuming this Jane Doe is somebody I know? I don't

1 think so, since this question makes no sense to me.  
 2 BY MR. SCAROLA:  
 3 Q. You have alleged in your Complaint that there  
 4 is a claim on behalf of Jane Doe versus Epstein pending  
 5 in the Federal District Court of the Southern District  
 6 of Florida.  
 7 I would like to know whether you ever had any  
 8 physical contact with the person referred to as Jane Doe  
 9 in that Complaint?  
 10 A. Ah, that Jane Doe. I'm sorry. But sitting  
 11 here today, Mr. Scarola, I'm going to have to refuse to  
 12 answer that question based on the Fifth Amendment, Sixth  
 13 Amendment and 14th Amendment.  
 14 Q. Did you ever exchange any money or gifts with  
 15 Jane Doe?  
 16 A. Again, Mr. Scarola, sitting here today, I'm  
 17 going to have to on advice of Counsel assert my Sixth  
 18 Amendment, Fifth Amendment and 14th Amendment Right.  
 19 Q. Your Complaint makes reference to a case  
 20 styled [REDACTED] versus Epstein, case number  
 21 502008CA028058XXXXMBAB, a case pending in the Circuit  
 22 Court of Palm Beach County, Florida.  
 23 Do you know who [REDACTED] is?  
 24 A. Sitting here today, Mr. Scarola, I'm going to  
 25 have to assert my rights as under the Fifth, Sixth and

1 to as [REDACTED].?  
 2 A. I believe it is [REDACTED].  
 3 Q. How long have you known [REDACTED].?  
 4 A. Well, with respect to that question,  
 5 Mr. Scarola, I'm going to have to assert my Fifth, Sixth  
 6 and 14th Amendment Rights, though I'd like to answer  
 7 every, single question you have about [REDACTED].  
 8 Q. How many times have you been in the physical  
 9 presence of [REDACTED].?  
 10 A. I'd like to answer every question about [REDACTED].  
 11 that you have today, Mr. Scarola; however, on advice of  
 12 Counsel, I'm going to have to assert my Fifth, Sixth and  
 13 14th Amendment Right.  
 14 Q. How old is [REDACTED].?  
 15 A. I don't know.  
 16 Q. How old was she when you met her?  
 17 A. Mr. Scarola, I'm going to have to assert my  
 18 rights under the Fifth, Sixth and 14th Amendment on  
 19 advice of Counsel, though I would like to answer every  
 20 one of these questions.  
 21 Q. Did you ever have any physical contact with  
 22 [REDACTED].?  
 23 A. Mr. Scarola, once again, I would like to  
 24 answer each one of your questions here today, but on  
 25 advice of Counsel I'm going to have to assert my Fifth,

1 14th Amendment.  
 2 Q. Have you ever learned the real name of [REDACTED].?  
 3 A. Yes, sir.  
 4 Q. Did that person whose real name you learned  
 5 ever spend any time in your physical presence?  
 6 A. Sir, at least sitting here today, I would like  
 7 to answer each and every one of your questions regarding  
 8 your [REDACTED], and -- are we not allowed to use the names of  
 9 these people, sir?  
 10 MR. PIKE: In the past -- in the past cases  
 11 the names of these individuals have been utilized  
 12 for deposition purposes.  
 13 Brad Edwards, sitting here today, knows that  
 14 we have used; however, any documents that are filed  
 15 with the Court will redact those names.  
 16 So the answer to the question is, yes, for  
 17 purposes of this deposition, to the extent you know  
 18 the names of individuals, you can utilize them with  
 19 agreement of Mr. Edwards.  
 20 MR. EDWARDS: I have no problem with that.  
 21 THE WITNESS: I think to avoid confusion, so  
 22 there's not -- I know who you're talking about.  
 23 That's all.  
 24 BY MR. SCAROLA:  
 25 Q. What is the real name of the person referred

1 Sixth and 14th Amendment Right.  
 2 Q. Did you ever exchange any money or gifts with  
 3 [REDACTED].?  
 4 A. Sir, I'd like to answer every question you  
 5 have about [REDACTED]; however, today, on advice of Counsel  
 6 I'm going to have to assert my Fifth, sixth and 14th  
 7 Amendment Right.  
 8 Q. Did you ever cause any money or gifts to be  
 9 delivered to [REDACTED].?  
 10 A. Mr. Scarola, as I've answered most of your  
 11 questions here today regarding [REDACTED], I would like to  
 12 answer every question regarding [REDACTED]; however, today, on  
 13 advice of Counsel, I'm going to have to assert my Fifth,  
 14 Sixth and 14th Amendment Right because though I would  
 15 choose to do so, I've been told that if I do so, I risk  
 16 losing my Counsel's representation.  
 17 Q. What is the actual value that you contend the  
 18 claim of [REDACTED] against you has?  
 19 MR. PIKE: Form. Relevance.  
 20 THE WITNESS: Sir, though I'd like to answer  
 21 every question about [REDACTED] and her claims and the  
 22 claims of your other people, on advice of Counsel  
 23 here today, I cannot do so. I must assert my  
 24 rights under the Sixth, Fifth and 14th Amendment.  
 25 BY MR. SCAROLA:

1 Q. Would your answer be the same with regard to  
2 and to Jane Doe?

3 MR. PIKE: I'm going to instruct you if your  
4 answer is the same, to invoke in full.

5 THE WITNESS: With respect to, I believe, Jane  
6 Doe -- and who is the other person? I'm sorry.

7 BY MR. SCAROLA:

8 Q. [REDACTED]

9 A. [REDACTED] Though I'd like to answer your claims  
10 with respect to all three of Mr. Edwards' clients, on  
11 advice of Counsel, at least today, I'm going to have to  
12 invoke my Fifth, Sixth and 14th Amendment Rights.  
13 Though I'd prefer to answer the question, I've been told  
14 that if I choose to do so, I risk losing their  
15 representation.

16 Q. Among those items listed by you as wrongdoing  
17 on the part of Mr. Edwards forming the basis for this  
18 lawsuit is that he, quote, counseled his clients to make  
19 multi-million dollar claims against you; is that  
20 correct?

21 MR. PIKE: Form. Document speaks for itself.

22 THE WITNESS: Document speaks for itself.

23 BY MR. SCAROLA:

24 Q. I'm not asking about a document. I'm asking  
25 you about the list of wrongdoing that you gave us during

1 A. No. I answered that question, which is, I'd  
2 like to know.

3 Q. Yes. But that isn't an answer to my question.

4 My question is: By whom was Mr. Edwards  
5 employed at the time that he initiated litigation  
6 against you? Do you know the answer to that question?

7 A. I'd have no way of knowing the answer to that  
8 question, sir.

9 Q. Among the allegations of wrongdoing against  
10 Mr. Edwards which you contend form the basis of this  
11 lawsuit is something having to do with sending an  
12 investigator to California.

13 Would you tell me, please, more specifically  
14 what it is that Mr. Edwards did with regard to sending  
15 an investigator to California which you contend  
16 justifies a legal claim against Mr. Edwards.

17 MR. PIKE: Form. And also mischaracterizes  
18 the witness' testimony.

19 THE WITNESS: Reported widely in the  
20 newspapers is the use of illegal activities, wire  
21 taps, and methods by the Rothstein firm while  
22 Mr. Edwards had basically been bringing these  
23 cases.

24 The investigator, Mr. Fisten, who's mentioned  
25 in the Complaint, represented himself as an FBI

1 the course of this deposition, which you allege form the  
2 basis for your claim against Mr. Edwards.

3 Is it your contention that among those things  
4 Mr. Edwards did that form the basis for your lawsuit is  
5 to have counseled his clients to make multi-million  
6 dollar claims against you?

7 MR. PIKE: Form.

8 THE WITNESS: What the newspapers have said is  
9 that the claims purported to have been made by the  
10 Rothstein firm and its partners allege  
11 multi-million dollar claims where no claims exist.

12 However, respect specifically to my claim  
13 today, I'm going to have assert my Fifth, Sixth and  
14 14th Amendment Right.

15 MR. PIKE: Also, the question mischaracterizes  
16 the witness' testimony.

17 BY MR. SCAROLA:

18 Q. By whom was Bradley Edwards employed when he  
19 initiated litigation against you?

20 A. I would like to know the answer to that  
21 question.

22 Q. So the answer to that question is, I don't  
23 know?

24 A. I would like --

25 Q. Correct?

1 agent, falsely represented himself as an FBI agent.  
2 BY MR. SCAROLA:

3 Q. Do you have any personal knowledge of anything  
4 that Mr. Fisten did while Mr. Fisten was in California?

5 MR. PIKE: To the extent that you can answer  
6 that question without disclosing my conversation or  
7 my firm's conversation or any of your attorneys'  
8 conversations with you, you can answer the  
9 question.

10 THE WITNESS: I'm sorry. Based on  
11 attorney/client privilege, I can't answer.

12 BY MR. SCAROLA:

13 Q. Is it your contention that Mr. Edwards was  
14 involved in an illegal wire tap?

15 A. It was widely reported in the newspaper --

16 Q. I'm not asking it was reported --

17 A. Excuse me.

18 Q. -- in the newspaper.

19 A. Excuse me.

20 Q. I want to know whether your contention is that  
21 Mr. Edwards was involved in an illegal wire tap.

22 MR. PIKE: Try once again to answer that  
23 question.

24 THE WITNESS: It's been widely reported in the  
25 newspaper that his firm and his partners were

1 involved in illegal wire taps, eavesdropping, hired  
2 former FBI and law enforcement officials in order  
3 to fabricate cases of a sexually charged nature  
4 against me and others.

5 BY MR. SCAROLA:

6 Q. Do you have any personal knowledge of  
7 Mr. Edwards ever having engaged in any illegal wire tap?

8 A. I have no personal knowledge; however, what I  
9 read in the newspapers and is widely reported is that  
10 his firm, and I believe Mr. Sakowitz went to the FBI  
11 after he was told that the firm was engaged in illegal  
12 wire taps and his partners were engaged in illegal wire  
13 taps.

14 The FBI, the U.S. Attorney has accused his  
15 firm of RICO, being the largest criminal fraud  
16 enterprise in South Florida's history and engaged in  
17 illegal wire taps. But the answer specifically to your  
18 question about personal knowledge, sir, no.

19 Q. Do you have any personal knowledge of  
20 Mr. Edwards ever having been involved in any illegal or  
21 improper eavesdropping?

22 A. It's been widely reported in the newspapers in  
23 South Florida that Mr. Edwards' firm, his partners were  
24 involved in illegal wire taps, illegal fact gathering,  
25 using what the newspapers quoted as sophisticated

1 Jeffrey Epstein, separate and apart from the  
2 allegations of fraud by his partners, I cannot  
3 answer that question because of attorney/client  
4 privilege.

5 BY MR. SCAROLA:

6 Q. Do you have any personal knowledge that  
7 Bradley Edwards was involved in any egregious civil  
8 litigation abuses?

9 MR. PIKE: Form. Confusing.

10 THE WITNESS: It's widely reported in the  
11 newspaper that Mr. Edwards' firm engaged in wild  
12 discovery processes, illegal activities, illegal  
13 eavesdropping in order to fleece unsuspecting  
14 investors in South Florida out of millions in  
15 dollars by crafting, fabricating malicious cases of  
16 a sexually charged nature in order to perpetrate a  
17 fraud.

18 BY MR. SCAROLA:

19 Q. Do you have any personal knowledge that  
20 Bradley Edwards ever forged Federal Court Orders and/or  
21 Opinions?

22 A. It's attorney/client privilege.

23 Q. Do you have any personal knowledge that  
24 Bradley Edwards was ever involved in the marketing of  
25 non-existing Epstein settlements?

1 methods. Mr. Sakowitz, who was approached as an  
2 investor, and Mr. Scherer, who's filed a Complaint,  
3 alleges similar activities. But personal knowledge  
4 myself, sir, no.

5 Q. Do you have any personal knowledge that  
6 Bradley Edwards was ever involved in obstructions of  
7 justice?

8 MR. PIKE: To the extent that you can answer  
9 that question without disclosing any  
10 attorney/client communications with any of your  
11 attorneys, you can answer that question.

12 THE WITNESS: It's attorney/client privilege,  
13 I'm afraid.

14 BY MR. SCAROLA:

15 Q. Do you have any personal knowledge that  
16 Bradley Edwards was ever involved in any actionable  
17 frauds?

18 MR. PIKE: Same -- same instruction, with any  
19 of your lawyers.

20 THE WITNESS: Yes. Outside of the newspapers,  
21 which have accused his firm of a monstrous fraud,  
22 purported to be the largest fraud in South  
23 Florida's history, accused by the U.S. Attorney  
24 where his partner sits in jail -- excuse me --  
25 reported in the newspapers of boxes of material on

1 MR. PIKE: Same instruction.

2 THE WITNESS: I'm sorry. I would like to  
3 answer that question, but on attorney/client  
4 privilege I cannot today.

5 BY MR. SCAROLA:

6 Q. It is alleged in your Complaint that you were  
7 subject to, quote, abusive investigatory tactics.

8 Other than those matters previously referred  
9 to in earlier questions, is it your contention that  
10 Bradley Edwards had any personal involvement in any  
11 other, quote, abusive investigatory tactics?

12 MR. PIKE: Form.

13 THE WITNESS: It's been widely reported in the  
14 newspapers that Mr. Edwards' firm was engaged in  
15 widely -- wildly abusive practices throughout the  
16 State of Florida in order to fleece unsuspecting  
17 investors out of millions of dollars.

18 The U.S. Attorney's Complaint alleges his firm  
19 engaged in a corrupt criminal enterprise.

20 Mr. Scherer's Complaint alleges monstrous  
21 amounts of fraud and discovery abuse.

22 I have no personal knowledge, separate from  
23 the attorney/client privileged information,  
24 regarding Mr. Edwards.

25 BY MR. SCAROLA:

1 Q. Do you have any personal knowledge that  
 2 Bradley Edwards ever filed legal papers that were  
 3 unsupportable?  
 4 MR. PIKE: I'm going to object to form.  
 5 And to the extent you can answer that question  
 6 without disclosing any attorney/client  
 7 communications with any of your attorneys, I'm  
 8 going to allow you to answer that question.  
 9 THE WITNESS: I'm afraid it's attorney/client  
 10 privilege.  
 11 BY MR. SCAROLA:  
 12 Q. Do you have any personal knowledge that  
 13 Mr. Edwards was ever involved in any conduct that,  
 14 quote, compromised the core values of both State and  
 15 Federal justice systems in South Florida?  
 16 MR. PIKE: Form.  
 17 THE WITNESS: Can you just ask -- can you  
 18 define for me what you mean by "personal  
 19 knowledge," sir?  
 20 BY MR. SCAROLA:  
 21 Q. Yes. Did you ever see, hear, smell, taste, or  
 22 touch anything that communicated to you directly and not  
 23 through the report of some third person or newspaper  
 24 that Bradley Edwards was personally involved in  
 25 compromising the core values of both State and Federal

1 were adversely affected by the misconduct that is the  
 2 subject of this Complaint," unquote.  
 3 Who are those hardworking and honest lawyers  
 4 that you are seeking to vindicate?  
 5 MR. PIKE: Form.  
 6 Give me a minute. What page of the Complaint  
 7 are you referring to?  
 8 MR. SCAROLA: Page 2.  
 9 MR. PIKE: Give me one second.  
 10 THE WITNESS: Can we go off the record just  
 11 for a second?  
 12 MR. PIKE: If it's okay with Mr. --  
 13 THE WITNESS: It's a bathroom break.  
 14 MR. PIKE: There's a question pending and  
 15 usually --  
 16 THE WITNESS: Sorry.  
 17 MR. PIKE: Just give me a second.  
 18 Okay.  
 19 THE WITNESS: Where is it?  
 20 MR. PIKE: It's page 2 of the Complaint, which  
 21 has my notes on it down here, the last sentence.  
 22 And to the extent that you have knowledge and  
 23 can answer that question, you can do so.  
 24 THE WITNESS: Could you repeat the question  
 25 for me, sir?

1 justice systems in South Florida?  
 2 MR. PIKE: Form.  
 3 Same instruction with regard to  
 4 attorney/client.  
 5 THE WITNESS: Yes. Are you suggesting that  
 6 anyone who told me specifically or things that I  
 7 might have read that specifically relate to him, is  
 8 not what you've been asking me for?  
 9 BY MR. SCAROLA:  
 10 Q. Yes, sir, that's exactly right.  
 11 A. You told me if I hear something, that's not  
 12 personal knowledge.  
 13 Q. Not if you hear it from somebody else.  
 14 A. Who else would I hear it from, besides  
 15 somebody else, sir?  
 16 Q. Well, if you heard it directly yourself.  
 17 A. From who?  
 18 Q. Maybe Mr. Edwards.  
 19 A. Uh-huh. Is that the only person, sir?  
 20 Q. That's the only person, that's correct.  
 21 A. Well, if it's the only person, separate from  
 22 attorney/client privilege, I cannot answer that.  
 23 Q. Your Complaint makes reference to a purpose in  
 24 filing this lawsuit to, quote, "vindicate the  
 25 hardworking and honest lawyers and their clients who

1 BY MR. SCAROLA:  
 2 Q. Yes, sir. Your Complaint makes reference to a  
 3 purpose in filing this lawsuit --  
 4 A. Yes.  
 5 Q. -- to vindicate the hardworking and honest  
 6 lawyers and their clients who were adversely affected by  
 7 the misconduct that is the subject of this Complaint.  
 8 A. Yes, sir.  
 9 Q. Who are those hardworking and honest lawyers  
 10 on whose behalf you are bringing this Complaint?  
 11 MR. PIKE: Okay. Form. Mischaracterizes the  
 12 Complaint itself.  
 13 To the extent you understand that question,  
 14 you can attempt to answer, if you recall.  
 15 THE WITNESS: Yes.  
 16 The U.S. Attorney, sir, has accused the  
 17 Rothstein firm of misusing the entire legal system,  
 18 a level of abuse never seen before in the United  
 19 States history, of forging documents, an affront to  
 20 any decent lawyer, signing Judge's Orders, sending  
 21 false statements to other lawyers. The people who  
 22 have been -- excuse me -- the Complaint by the U.S.  
 23 Attorney, in fact, describes the behavior of the  
 24 law firm, as well as Mr. -- my Complaint says,  
 25 Mr. Edwards being a part of that.

1 BY MR. SCAROLA:  
 2 Q. Now, before you answered that question, you  
 3 reviewed a document, right?  
 4 A. The Complaint, sir.  
 5 Q. I'd like to see it, please.  
 6 MR. PIKE: Definitely not, Mr. Scarola.  
 7 My notes are on that and that's  
 8 attorney/client. I allowed the witness to take a  
 9 look at the document and he did not write anything  
 10 on the document. He looked at the document.  
 11 That's my client. And you will certainly not be  
 12 looking at my notes, which are all over this  
 13 document.  
 14 MR. SCAROLA: He didn't look at everything.  
 15 He looked at one page. I would like that one page,  
 16 please.  
 17 MR. PIKE: Absolutely not, Mr. Scarola.  
 18 MR. SCAROLA: I would like that page marked as  
 19 an Exhibit to this deposition.  
 20 MR. PIKE: Absolutely not, Mr. Scarola.  
 21 MR. SCAROLA: I would state for the record  
 22 that it is my intention, since that page with  
 23 handwritten notations on it was reviewed by the  
 24 witness during the course of this deposition while  
 25 a question was pending, I want that page preserved

1 We have asked for Scott Rothstein's  
 2 deposition. We hopefully will get it. Maybe he will  
 3 give us some insight on how other lawyers have, in fact,  
 4 been handled and the abuses they've undergone, including  
 5 forging a Federal Judge's signature, sir.  
 6 Q. Now, was it your intention in this sentence to  
 7 say that you were trying to vindicate the hardworking  
 8 and honest lawyers and their clients?  
 9 A. It's attorney/client. I'm sorry.  
 10 Q. Your intention is attorney/client privileged?  
 11 MR. PIKE: Form. I'm not quite --  
 12 BY MR. SCAROLA:  
 13 Q. Is that what you're telling us?  
 14 MR. PIKE: Wait a second. I'm not quite sure  
 15 I understand the question.  
 16 THE WITNESS: What's the question?  
 17 BY MR. SCAROLA:  
 18 Q. Were you attempting to communicate in this  
 19 Complaint a desire on your part to vindicate hardworking  
 20 and honest lawyers and their clients?  
 21 MR. PIKE: Form.  
 22 THE WITNESS: In this Complaint, I intend to  
 23 get to the truth of Mr. Edwards' behavior and the  
 24 Rothstein firm, sir.  
 25 BY MR. SCAROLA:

1 so that the Court can make a determination as to  
 2 whether I am entitled to see it.  
 3 MR. PIKE: I would object based upon  
 4 attorney/client and work product in that regard.  
 5 THE WITNESS: Now can we take a bathroom  
 6 break?  
 7 MR. SCAROLA: No, sir, because you still  
 8 haven't answered my question.  
 9 THE WITNESS: Okay.  
 10 BY MR. SCAROLA:  
 11 Q. I want to know who the, quote, "hardworking  
 12 and honest lawyers" are that are referred to in that  
 13 section of your Complaint.  
 14 A. My attorneys, at least, are honest.  
 15 Q. Which ones?  
 16 A. All of them.  
 17 Q. And you say that you want to vindicate the  
 18 hardworking and honest lawyers and their clients?  
 19 A. That's correct.  
 20 Q. Which clients?  
 21 A. Me, some of the other clients, in fact, abused  
 22 by the Rothstein firm. I don't know the full extent.  
 23 Hopefully when we get to trial, we're going to find out  
 24 the extent of the people, the lawyers, the clients that  
 25 were abused by Mr. Edwards and the Rothstein firm.

1 Q. Well, what this sentence says is, quote, --  
 2 A. Yes.  
 3 Q. -- "the Rothstein racketeering enterprise  
 4 endeavored to compromise the core values of both State  
 5 and Federal systems in South Florida and to vindicate  
 6 the hardworking and honest lawyers and their clients who  
 7 were adversely affected by the misconduct that is the  
 8 subject of this Complaint."  
 9 Is that what you meant to communicate?  
 10 A. It says what it says, sir.  
 11 Q. Well, I know it says what it says. I'm trying  
 12 to find out if that's what you meant to say; that is,  
 13 that the Rothstein racketeering enterprise endeavored to  
 14 vindicate the hardworking and honest lawyers and their  
 15 clients who were adversely affected by the misconduct  
 16 that is the subject of this Complaint.  
 17 MR. PIKE: Form. Mischaracterizes the  
 18 language of the document.  
 19 THE WITNESS: Yeah, I think you've misread  
 20 that again. You want to -- I certainly didn't ask  
 21 for the Rothstein firm to vindicate the lawyers, is  
 22 what you've just --  
 23 BY MR. SCAROLA:  
 24 Q. Well, that's what I'm trying to find out,  
 25 whether you meant to say what you said in this

1 Complaint.  
 2 Did you read the Complaint before it was  
 3 filed?  
 4 MR. PIKE: Form. Move to strike.  
 5 THE WITNESS: Thank you, sir.  
 6 BY MR. SCAROLA:  
 7 Q. Did you read the Complaint before it was  
 8 filed?  
 9 A. It was a while ago, yes, sir.  
 10 Q. And did you approve the Complaint prior to its  
 11 filing?  
 12 A. Yes, sir.  
 13 Q. And did you mean to say what this sentence  
 14 says, "the Rothstein racketeering enterprise endeavored  
 15 to vindicate the hardworking and honest lawyers and  
 16 their clients, who were adversely affected by the  
 17 misconduct that is the subject of this Complaint?"  
 18 MR. PIKE: Okay. I'm going to move to strike.  
 19 Mischaracterizes the language of the document.  
 20 The document reads as follows, for purposes of  
 21 the record: "The Rothstein racketeering enterprise  
 22 endeavored to compromise the core values of both  
 23 State and Federal justice systems in South Florida  
 24 and to vindicate the hardworking and honest lawyers  
 25 and their clients who were adversely affected by

1 the misconduct that is the subject of this  
 2 Complaint."  
 3 BY MR. SCAROLA:  
 4 Q. Is that what you meant to say?  
 5 A. What I meant to say, it is -- seems to me  
 6 somewhat unclear -- is that the Rothstein firm, along  
 7 with Mr. Edwards, is part of a criminal enterprise, the  
 8 largest -- excuse me -- the largest criminal enterprise  
 9 in South Florida's history, forging Judges' signatures,  
 10 engaging in illegal wire taps, illegal behaviors. And  
 11 part of this lawsuit should vindicate, which means, I  
 12 believe should set right.  
 13 And if it's not clear, the Rothstein firm  
 14 compromised the core values of our legal justice system.  
 15 It abused every -- many of the precepts, the most basic  
 16 values of the American justice system.  
 17 And, in fact, I believe this lawsuit, part of  
 18 the reason for filing this lawsuit, it will disclose the  
 19 various techniques of attorney/client privilege, abuse  
 20 of technique, abuse of discovery, illegal wire taps,  
 21 forging signatures engaged in by both Mr. Edwards and  
 22 his firm.  
 23 Q. So it is your contention that Mr. Edwards was  
 24 part of a criminal enterprise?  
 25 A. Yes, it is.

1 Q. Knowingly part of a criminal enterprise?  
 2 MR. PIKE: Form.  
 3 THE WITNESS: Attorney/client privilege.  
 4 MR. SCAROLA: You wanted to take a break and  
 5 before I move on to another subject, we'll do that.  
 6 But I want -- I want to observe for the record that  
 7 the last break was less than an hour ago. While I  
 8 want to try to make reasonable accommodations to  
 9 witnesses so as not to impose unnecessarily upon  
 10 their physical comfort, I will object to breaks  
 11 occurring at less than one-hour intervals during  
 12 the course of this deposition.  
 13 VIDEOGRAPHER: We're now off video record. It  
 14 is 11:34 a.m.  
 15 (Brief recess.)  
 16 VIDEOGRAPHER: We are now back on video  
 17 record. It is 11:45 a.m. and we are on media  
 18 number two.  
 19 BY MR. SCAROLA:  
 20 Q. What knowledge do you have of Brad Edwards  
 21 ever having personally engaged in mail fraud?  
 22 A. It's been widely reported in the press --  
 23 Q. I'm going to withdraw my question.  
 24 What personal knowledge do you have of Bradley  
 25 Edwards ever having been engaged in any mail fraud?

1 A. Will you describe what you mean by "personal  
 2 knowledge," sir?  
 3 Q. I mean direct observation through your senses  
 4 on your part.  
 5 A. So are you asking me whether or not I've  
 6 witnessed him sending something directly, putting  
 7 physically in the mail, sir?  
 8 Q. I'm asking whether you have ever personally  
 9 witnessed Bradley Edwards ever having engaged in mail  
 10 fraud.  
 11 A. I'm not sure how that's possible for anybody  
 12 to witness a mail fraud, so would you inform me how it's  
 13 done?  
 14 Q. So the answer to my question is, you don't  
 15 know; is that correct?  
 16 A. My answer to your question is --  
 17 MR. PIKE: Form. Mischaracterizes the  
 18 witness' testimony.  
 19 THE WITNESS: I've asked for a clarification.  
 20 BY MR. SCAROLA:  
 21 Q. Have you ever personally witnessed Bradley  
 22 Edwards engaging in mail fraud?  
 23 MR. PIKE: Form.  
 24 THE WITNESS: No, sir.  
 25 BY MR. SCAROLA:

1 Q. Have you ever personally witnessed Bradley  
 2 Edward -- Edwards engaged in wire fraud?  
 3 A. How would one -- I'm not sure how anyone would  
 4 personal -- have personal knowledge, witness someone  
 5 engaging in wire fraud, unless they were simply sitting  
 6 over their computer looking at their bank accounts. So,  
 7 unfortunately, I would have to say, no, sir.  
 8 Q. Have you ever personally witnessed Bradley  
 9 Edwards engaged in money laundering?  
 10 MR. PIKE: Form.  
 11 THE WITNESS: Again, sir, the U.S. Attorney's  
 12 Complaint of the Rothstein firm alleges money  
 13 laundering, wire fraud, mail fraud, RICO claims of  
 14 Mr. Edwards' partners and his firm, calling the  
 15 firm the largest criminal enterprise in South  
 16 Florida's history, accused of fabricating malicious  
 17 cases, sir, of a sexually charged nature in order  
 18 to fleece unsuspecting South Floridians out of  
 19 millions of dollars.  
 20 BY MR. SCAROLA:  
 21 Q. And I'm trying to find out, Mr. Epstein,  
 22 whether you have any evidence whatsoever that  
 23 Mr. Edwards ever personally participated in any of that  
 24 wrongdoing?  
 25 MR. PIKE: To that question, to the extent you

1 payout settlement?  
 2 MR. PIKE: Form.  
 3 THE WITNESS: I'd like to answer that question  
 4 by saying that the newspapers have reported that  
 5 his firm was engaged in fraudulent structured  
 6 settlements in order to fleece unsuspecting Florida  
 7 investors.  
 8 With respect to my personal knowledge, I'm  
 9 unfortunately going to, today, but I look forward  
 10 to at some point being able to disclose it, today  
 11 I'm going to have to assert the attorney/client  
 12 privilege.  
 13 BY MR. SCAROLA:  
 14 Q. Your Complaint alleges that Rothstein and  
 15 others in RRA were using RRA to market investments.  
 16 Who are the others referred to in the  
 17 Complaint?  
 18 A. From my understanding of the U.S. Attorney's  
 19 Complaint, from Mr. Scherer's Complaint, it is the  
 20 partners and people who held themselves out to be  
 21 partners of the Roth -- Scott Rothstein, including  
 22 Mr. Berger, Mr. Adler, Mr. Edwards and other people  
 23 associated with the firm like Mr. Fisten, Diane  
 24 Villegas, if that's how you pronounce her name, Russell  
 25 Adler, and many of the other partners of his firm

1 can answer it without violating attorney/client and  
 2 work product, you can answer the question.  
 3 THE WITNESS: I'm afraid it will be  
 4 attorney/client privilege, sir.  
 5 BY MR. SCAROLA:  
 6 Q. Do you have any evidence -- knowledge of any  
 7 evidence whatsoever that Mr. Edwards ever participated  
 8 in any effort to market any kind of investment in  
 9 anything?  
 10 A. I would have to claim attorney/client  
 11 privilege on that, sir.  
 12 MR. PIKE: Form.  
 13 BY MR. SCAROLA:  
 14 Q. Do you have knowledge of any evidence  
 15 whatsoever that Mr. Edwards was ever a participant in  
 16 devising a plan through which were sold purported  
 17 confidential assignments of a structured payout  
 18 settlement?  
 19 A. The newspapers and blogs have widely reported  
 20 that Mr. Edwards' firm crafted -- would you repeat the  
 21 question for me, again, sir? I'm sorry.  
 22 Q. Yes, sir. I want to know whether you have any  
 23 knowledge of evidence that Bradley Edwards personally  
 24 ever participated in devising a plan through which were  
 25 sold purported confidential assignments of a structured

1 currently under investigation by either the Florida Bar  
 2 or the U.S. Attorney or FBI or all of the above, sir.  
 3 Q. Which -- which source of information  
 4 referenced in that answer specifically made reference to  
 5 Mr. Edwards?  
 6 A. I don't recall, sir.  
 7 Q. But you do have a recollection that one or  
 8 more of them did; is that correct?  
 9 A. I don't recall, sir.  
 10 Q. So you want to withdraw the earlier response  
 11 that you made and your real answer is, I don't know; is  
 12 that correct?  
 13 MR. PIKE: Mischaracterizes the witness'  
 14 testimony. Move to strike.  
 15 BY MR. SCAROLA:  
 16 Q. Your response, sir?  
 17 A. My answer stays the same, sir.  
 18 Q. Is it your contention that one or more  
 19 lawsuits was fabricated against you?  
 20 A. It's been widely reported in the newspapers --  
 21 Q. That's not my question.  
 22 A. Excuse me. I was answering.  
 23 MR. PIKE: Please let the witness answer the  
 24 question, Mr. Scarola.  
 25 BY MR. SCAROLA:

1 Q. No, you're not answering my question.  
 2 MR. PIKE: He's only said three words, so you  
 3 don't know whether he's answering your question or  
 4 not.  
 5 MR. SCAROLA: I didn't ask him anything about  
 6 newspapers. I asked him about his contention. I  
 7 don't know he's not answering my question.  
 8 BY MR. SCAROLA:  
 9 Q. But you can go ahead, Mr. Epstein, and you can  
 10 make your silly speech one more time.  
 11 MR. PIKE: I'm going to move to strike.  
 12 THE WITNESS: You want to repeat the question?  
 13 BY MR. SCAROLA:  
 14 Q. Yes, sir. I would like to know whether it is  
 15 your contention that one or more lawsuits have been  
 16 fabricated against you.  
 17 A. My contention, sir, is that the firm of  
 18 Edwards' partners, Scott Rothstein, fabricated many  
 19 cases, reported by the press and the U.S. Attorney,  
 20 amongst people like me and others of a sexually charged  
 21 nature in order to fleece investors of South Florida out  
 22 of millions of dollars.  
 23 Do I have a -- with respect to my individual  
 24 cases that Mr. Edwards has filed in these three cases,  
 25 I'm unfortunately today, and only today at least, on

1 potential defendants could be, in essence, blackmailed.  
 2 MR. PIKE: Would you identify for me,  
 3 Mr. Scarola, what page?  
 4 MR. SCAROLA: Page 8, paragraph 19.  
 5 BY MR. SCAROLA:  
 6 Q. Did anyone ever sift through your garbage  
 7 looking for damaging evidence?  
 8 MR. PIKE: One second.  
 9 In light of clarity, Mr. Scarola, would you  
 10 please read the entire paragraph so Mr. Epstein  
 11 understands the tenor of the paragraph?  
 12 MR. SCAROLA: No. I want to know whether  
 13 anyone ever sifted through Mr. Edwards' garbage --  
 14 through Mr. Epstein's garbage. That's the pending  
 15 question.  
 16 MR. PIKE: To the extent you understand the  
 17 question, you can answer.  
 18 THE WITNESS: I think the question is poorly  
 19 phrased. Did anyone ever sift through my garbage?  
 20 What does that mean?  
 21 BY MR. SCAROLA:  
 22 Q. You don't know what sifting through garbage  
 23 means?  
 24 A. Does that mean the garbage man? Does that  
 25 include the garbage man? I'm sure he sifted through my

1 advice of Counsel I'm going to have to assert my Fifth,  
 2 Sixth and 14th Amendment, sir.  
 3 Q. Okay. Well, I'm not limiting my question to  
 4 the three cases referenced in your Complaint. I want to  
 5 know whether you contend that any claim against you has  
 6 been fabricated?  
 7 MR. PIKE: Form. Overbroad and confusing and  
 8 it's compound.  
 9 THE WITNESS: The question makes no sense to  
 10 me. I'm sure you could do better.  
 11 BY MR. SCAROLA:  
 12 Q. Is there any pending claim against you which  
 13 you contend is fabricated?  
 14 A. At least today, sir, I'm going to have to  
 15 respond by asserting my Fifth, Sixth and 14th Amendment  
 16 Right.  
 17 MR. PIKE: Form, also.  
 18 BY MR. SCAROLA:  
 19 Q. Is it your contention that Bradley Edwards was  
 20 ever personally involved in manufacturing false and/or  
 21 fraudulent Court Opinions or Orders?  
 22 A. Attorney/client privilege.  
 23 Q. Your Complaint makes reference to someone  
 24 sifting through a potential defendant's garbage looking  
 25 for damaging evidence to use with investors to show how

1 garbage.  
 2 Q. Which garbage man sifted through your garbage?  
 3 A. I'm sure people who go through garbage sift  
 4 through the garbage. I have no idea.  
 5 Q. Did anyone ever sift through your garbage  
 6 looking for damaging evidence?  
 7 A. It's been widely reported in the newspapers,  
 8 sir, that the Rothstein firm engaged in sifting through  
 9 many people's garbage in order -- in an attempt to  
 10 blackmail them.  
 11 Q. Yes. But I didn't ask you what some newspaper  
 12 is alleged to have reported.  
 13 What I did ask you is whether anyone ever  
 14 sifted through your garbage looking for damaging  
 15 evidence.  
 16 And the answer to that question, I think, can  
 17 be either yes, no, or I don't know.  
 18 MR. PIKE: Move to strike.  
 19 BY MR. SCAROLA:  
 20 Q. Or you could refuse to answer it on the  
 21 grounds that it may tend to incriminate you.  
 22 A. I think you might --  
 23 MR. PIKE: Move to strike.  
 24 THE WITNESS: I would like to answer my own  
 25 questions. If you'd like to answer all my

1 questions, Mr. Scarola, I'm more than happy to sit  
2 here and answer them. Would you like to continue?

3 BY MR. SCAROLA:

4 Q. Yes. I'd like to know what the answer to that  
5 question is. Did anyone ever sift through your garbage  
6 looking for damaging evidence?

7 MR. PIKE: Form.

8 THE WITNESS: I don't know.

9 BY MR. SCAROLA:

10 Q. Did you ever have damaging evidence in your  
11 garbage?

12 A. What's damaging evidence, sir?

13 Q. Evidence tending to implicate you in criminal  
14 conduct.

15 MR. PIKE: Form.

16 THE WITNESS: At least today, Mr. Scarola,  
17 with these -- with your questions and your claims  
18 and your defense of Mr. Edwards and his firm, the  
19 Rothstein firm, while his partner sits in jail,  
20 today I'm going to have to assert my Fifth, Sixth  
21 and 14th Amendment Right, sir.

22 BY MR. SCAROLA:

23 Q. Did you ever have any evidence in your garbage  
24 that would subject you to blackmail?

25 MR. PIKE: Form. Same -- same objection.

1 THE WITNESS: Again, I'll respectfully answer  
2 the question by asserting my Fifth, Sixth and 14th  
3 Amendment Right.

4 BY MR. SCAROLA:

5 Q. Your Complaint in paragraph 21, page 9, says  
6 that: "Upon information and belief, Rothstein, David  
7 Boden, Debbie Villegas, Andrew Barnett, Michael Fisten  
8 and Kenneth Jenne, all employees of RRA, through brokers  
9 or middle men would stage regular meetings during which  
10 false statements were made about the number of  
11 cases/clients that existed or RRA had against Epstein  
12 and the value thereof."

13 Do you have any knowledge that Mr. Edwards  
14 ever knew about such meetings being conducted?

15 MR. PIKE: Form.

16 To the extent you understand the question and  
17 it will not violate any attorney/client or work  
18 product privilege information, you can answer that  
19 question.

20 MR. SCAROLA: Mr. Pike, it has become evident  
21 that that speaking instruction to your witness is  
22 an instruction for him to assert an attorney/client  
23 privilege, regardless of whether it is or is not  
24 valid and I object to it.

25 MR. PIKE: Let me make the record clear.

1 You've been interchanging knowledge with personal  
2 knowledge. And many of the objections to which I  
3 am asserting an attorney/client and work product  
4 privilege are based upon your malphrased question  
5 and use of personal knowledge and knowledge  
6 interchangeably with those questions.

7 So if you want to rephrase your question to  
8 attempt to elicit a response -- let me finish --  
9 then I have no objection to that. However, I'm not  
10 going to sit here and allow my client to waive  
11 attorney/client and work product.

12 Now, to the extent you're saying I'm coaching  
13 the witness, I object to that because I am  
14 certainly not. The witness is here to answer your  
15 questions and I believe has been answering your  
16 questions today to the best of his ability.

17 MR. SCAROLA: I am saying you're coaching the  
18 witness.

19 BY MR. SCAROLA:

20 Q. Could you answer the question?

21 MR. PIKE: Same objection.

22 THE WITNESS: You'll have to repeat it.

23 BY MR. SCAROLA:

24 Q. Do you have any information indicating that  
25 Bradley Edwards ever had any knowledge of anyone

1 associated with the Rothstein firm holding meetings  
2 during which, quote, "false statements were made about  
3 the number of cases/clients that existed or RRA had  
4 against Epstein and the value thereof," unquote?

5 MR. PIKE: Form. Same objection.

6 THE WITNESS: My best recollection is the U.S.  
7 Attorney has accused the Rothstein firm of just  
8 those types of meetings where the partners got  
9 together, schemed to defraud local investors of  
10 millions of dollars by fabricating cases of a  
11 sexually charged nature. And whether Mr. Edwards  
12 personally participated, I'm going to at least  
13 today, sir, have to assert the attorney/client  
14 privilege, but look forward to one day disclosing  
15 it.

16 MR. SCAROLA: Move to strike all unresponsive  
17 portions of the answer.

18 BY MR. SCAROLA:

19 Q. Paragraph 23 of your Complaint says that:  
20 "RRA, Rothstein and Edwards, claiming the need for  
21 anonymity with regard to existing or fabricated clients,  
22 they were able to effectively use initials," et cetera.

23 Do you have any knowledge that Bradley Edwards  
24 fabricated a client to bring a claim against you?

25 MR. PIKE: Form.

1 THE WITNESS: I believe Mr. Scherer's  
 2 Complaint --  
 3 BY MR. SCAROLA:  
 4 Q. I'm not asking about Mr. Scherer's Complaint.  
 5 I'm asking about any evidence that you have.  
 6 MR. PIKE: The witness is basically been five  
 7 words into his sentence and you're not allowing him  
 8 to finish, once again.  
 9 So if you recall the question, then please  
 10 respond.  
 11 THE WITNESS: Please repeat it back, please?  
 12 MR. PIKE: Madame Court Reporter, if you  
 13 would.  
 14 (Pending question was read.)  
 15 MR. PIKE: Form.  
 16 THE WITNESS: The pleadings of Mr. Scherer and  
 17 his claim against the Rothstein firm for a massive  
 18 fraud, as well as Mr. Sakowitz's claims to -- at  
 19 least in the -- described in the public press,  
 20 because he went to the FBI, for fabricating cases  
 21 that included initials.  
 22 With respect to anything specific with  
 23 Mr. Edwards, I'm going to have to claim the  
 24 attorney/client privilege today, sir.  
 25 BY MR. SCAROLA:

1 MR. PIKE: -- then, please, --  
 2 THE WITNESS: Yes.  
 3 MR. PIKE: -- answer Mr. Scarola's question.  
 4 THE WITNESS: Separate from --  
 5 MR. SCAROLA: Objection. Coaching the  
 6 witness.  
 7 THE WITNESS: Separate from the communication  
 8 I've had with my attorneys, I can't answer that  
 9 question.  
 10 MR. PIKE: Mr. Scarola, I'm confused. I  
 11 started objecting to form in the beginning of this  
 12 deposition. You then instructed me, which is  
 13 against the rules, Mr. Pike, I don't know what's  
 14 wrong with the form. I object to you objecting to  
 15 form.  
 16 Then I assert the attorney/client, work  
 17 product, and now you're telling me I'm coaching the  
 18 witness.  
 19 So tell me, Mr. Scarola, what is the -- what  
 20 is the way that you would like me to object in this  
 21 deposition, and maybe I can conform that way for  
 22 you, which may or may not be consistent with the  
 23 Florida Rules of Civil Procedure.  
 24 MR. SCAROLA: Mr. Pike, --  
 25 MR. PIKE: Yes, sir.

1 Q. Do you have any -- do you have knowledge of  
 2 the existence of any evidence that Bradley Edwards knew  
 3 that Rothstein was utilizing RRA as a front for a Ponzi  
 4 scheme?  
 5 MR. PIKE: Form.  
 6 THE WITNESS: That's attorney/client  
 7 privilege.  
 8 BY MR. SCAROLA:  
 9 Q. Do you have knowledge of any evidence that  
 10 would indicate Bradley Edwards should have known that  
 11 Rothstein was utilizing RRA as a front for a Ponzi  
 12 scheme?  
 13 MR. PIKE: Form.  
 14 THE WITNESS: At least today --  
 15 MR. PIKE: Wait.  
 16 THE WITNESS: Sorry.  
 17 MR. PIKE: Form. Same objections. Same  
 18 attorney/client, work product as to the last  
 19 question. Same objections here, attorney/client  
 20 work product.  
 21 THE WITNESS: And today I'm going to have to  
 22 assert the attorney/client privilege.  
 23 MR. PIKE: To the extent you can answer that  
 24 question --  
 25 THE WITNESS: I understand.

1 MR. SCAROLA: -- if you don't know the  
 2 difference between a form objection and a privilege  
 3 objection --  
 4 MR. PIKE: Right.  
 5 MR. SCAROLA: -- then this deposition is not  
 6 the proper context in which for you to learn the  
 7 difference between a form objection and a privilege  
 8 action.  
 9 MR. PIKE: I'm pretty clear on what a form  
 10 objection is and what a privilege objection is and  
 11 I'm pretty knowledgeable on that. The problem --  
 12 MR. SCAROLA: Then we don't need to engage in  
 13 any further discussion.  
 14 MR. PIKE: -- I want to try to make the record  
 15 clear, because initially you didn't want me to  
 16 object to form. You wanted me to speak. So I'm  
 17 thinking you're conceding to that point.  
 18 What my question is, is: What's wrong with my  
 19 objecting to attorney/client, work product? So I  
 20 guess I'm asking you what you were asking me  
 21 earlier on. What's wrong with the form?  
 22 We can just move forward.  
 23 BY MR. SCAROLA:  
 24 Q. In your Complaint you identify the RRA law  
 25 firm, Rothstein and Edwards, as the, quote, "litigation

1 team," unquote.  
 2 You then go on to say in paragraph 31 of your  
 3 Complaint at page 12 that: "Rothstein and the  
 4 litigation team" --  
 5 MR. PIKE: Wait a minute. Put that down for a  
 6 second. Hold on.  
 7 THE WITNESS: You can read it.  
 8 BY MR. SCAROLA:  
 9 Q. "Individually and in a concerted effort may  
 10 have unethically and illegally engaged in certain  
 11 specified conduct."  
 12 May we correctly conclude from that statement  
 13 that you don't have any knowledge as to whether the,  
 14 quote, "litigation team," including Mr. Edwards, engaged  
 15 in any unethical and illegal conduct?  
 16 MR. PIKE: For now, while I'm reviewing the  
 17 document itself, I'm just going to just tell you to  
 18 hold off --  
 19 THE WITNESS: Sure.  
 20 MR. PIKE: -- on answering that question.  
 21 You may want to go off the record, so we don't  
 22 have a lag in --  
 23 MR. SCAROLA: No, I'd like it on the record.  
 24 Thank you.  
 25 MR. PIKE: Mr. Scarola, did you bring an extra

1 Edwards, individually and personally, sold, allowed to  
 2 be sold and/or assisted with the sale of an interest in  
 3 non-settled personal injury lawsuits?  
 4 MR. PIKE: Before you answer that question,  
 5 Madame Court Reporter, will you please read that  
 6 question back to me?  
 7 (Pending question was read.)  
 8 MR. PIKE: To the extent you can answer that  
 9 question without divulging attorney/client or work  
 10 product information, you may answer that question.  
 11 MR. SCAROLA: Objection. Coaching.  
 12 THE WITNESS: You said, allowed to be sold.  
 13 I'm going to assert attorney/client privilege to  
 14 the answer, I'm afraid, but I'd like to answer that  
 15 question.  
 16 BY MR. SCAROLA:  
 17 Q. Do you have knowledge of any evidence  
 18 indicating that Bradley Edwards ever reached agreements  
 19 to share attorney's fees with non-lawyers?  
 20 MR. PIKE: I'm sorry. Mr. Scarola, can you  
 21 tell me what page of the Complaint you're referring  
 22 to, if you are?  
 23 MR. SCAROLA: I'm not referring to any page of  
 24 the Complaint, although I will tell you that that  
 25 precise allegation is made in the Complaint.

1 copy of the Complaint that you're questioning  
 2 Mr. Epstein on for Mr. Epstein to look at?  
 3 MR. SCAROLA: No.  
 4 MR. PIKE: Okay. I'm going to have to go get  
 5 him a copy so he can -- the paragraphs of this  
 6 Complaint are very long and the Complaint itself is  
 7 in excess of -- it was approximately 35 pages,  
 8 so...  
 9 MR. SCAROLA: I'll withdraw the question.  
 10 BY MR. SCAROLA:  
 11 Q. Do you have any evidence that Brad Edwards  
 12 sold, allowed to be sold and/or assisted with the sale  
 13 of an interest in non-settled personal injury lawsuits?  
 14 MR. PIKE: Form.  
 15 THE WITNESS: The newspapers have widely  
 16 reported that the Rothstein firm engaged in illegal  
 17 structured settlements of cases of a sexual nature,  
 18 including specifically, me. We have subpoenaed the  
 19 documents from Mr. Edwards and his firm and we have  
 20 not been able to get them as of yet.  
 21 I am confident that once we do, I will be able  
 22 to answer your questions with more specificity.  
 23 BY MR. SCAROLA:  
 24 Q. As you sit here today, do you have any  
 25 evidence whatsoever to support an assertion that Bradley

1 THE WITNESS: In fact, Mr. Scarola, we have  
 2 subpoenaed Mr. Edwards' documents and documents  
 3 from his firm that I believe will, in fact, give me  
 4 more specificity with the answers to that question.  
 5 I'm looking forward to getting the -- that  
 6 specific evidence. With respect to what we  
 7 currently know, sitting here today, I'm  
 8 unfortunately going to have to claim my  
 9 attorney/client privilege.  
 10 BY MR. SCAROLA:  
 11 Q. Do you today have any evidence to support an  
 12 assertion that Bradley Edwards ever used investor money  
 13 to pay [REDACTED], [REDACTED], and/or Jane Doe up-front money, such  
 14 that they would refuse to settle civil actions?  
 15 MR. PIKE: Same instruction.  
 16 THE WITNESS: You'll have to get -- I need to  
 17 hear the first part of the question. Do I have any  
 18 evidence? Do I have knowledge of evidence? I'm  
 19 sorry. What was the --  
 20 BY MR. SCAROLA:  
 21 Q. Do you have knowledge of any evidence to  
 22 support that assertion?  
 23 MR. PIKE: To the extent you can answer that  
 24 question without violating attorney/client, work  
 25 product, please do so.

1 MR. SCAROLA: Objection. Coaching.  
 2 THE WITNESS: I'm going to have to assert the  
 3 attorney/client privilege, I'm afraid, though I'd  
 4 like to answer that question as well, sir.  
 5 BY MR. SCAROLA:  
 6 Q. Do you have any evidence to support the  
 7 assertion that Bradley Edwards conducted searches, wire  
 8 taps or intercepted conversations in violation of State  
 9 or Federal laws and Bar rules?  
 10 A. Your question, once again, asked did Mr. --  
 11 was Mr. Edwards personally involved in the  
 12 eavesdropping? Did he walk to someone's house and sort  
 13 of put a bug in their house? Did he, personally, stand  
 14 outside?  
 15 The question is, did Mr. Edwards' firm engage  
 16 in this behavior in an attempt to defraud local  
 17 investors out of millions of dollars? The U.S. attorney  
 18 has filed a Complaint saying that they did. The  
 19 Complaints filed by Scherer saying that his firm did.  
 20 The Scherer Complaint says my name and the  
 21 boxes of files that we've subpoenaed used my name, sir.  
 22 We have requested information, but up until  
 23 today have not received any.  
 24 To give you a more specific answer, I'm afraid  
 25 I cannot.

1 To the extent you can answer the question  
 2 without disclosing attorney/client or work product  
 3 information, do so.  
 4 THE WITNESS: The pleadings of Mr. Scherer  
 5 with respect to the largest Ponzi scheme in South  
 6 Florida's history engaged in by Mr. Edwards' firm  
 7 and Scott Rothstein, who currently sits in jail,  
 8 probably for the rest of his life for engaging in,  
 9 not only illegal wire taps and eavesdropping, but  
 10 an abuse of the entire legal system, I believe  
 11 speaks for itself.  
 12 Unfortunately, with respect to Mr. Edwards  
 13 today, I'm going to have to assert the  
 14 attorney/client, work privilege, sir.  
 15 BY MR. SCAROLA:  
 16 Q. Is it your contention that Mr. Scherer's  
 17 Complaint even contains the name Bradley Edwards?  
 18 A. I don't recall, sir.  
 19 Q. Did sexual assaults ever take place on a  
 20 private airplane on which you were a passenger?  
 21 MR. PIKE: Form. Relevance.  
 22 THE WITNESS: At least -- I would like to  
 23 answer each and every one of your questions here  
 24 today, Mr. Scarola. But at least today, I'm going  
 25 do have to assert my Fifth, Sixth and 14th

1 Q. Do you have knowledge of any evidence that  
 2 Bradley Edwards ever conducted searches, wire taps or  
 3 intercepted conversations in violation of State or  
 4 Federal laws and Bar rules?  
 5 MR. PIKE: Same instruction.  
 6 THE WITNESS: The newspapers and the U.S.  
 7 Attorney's Complaint widely reported that  
 8 Mr. Edwards' firm and people hired by his firm,  
 9 investigators hired by his firm fraudulently  
 10 representing themselves as FBI agents engaged in  
 11 just those activities, sir.  
 12 BY MR. SCAROLA:  
 13 Q. Do you have any knowledge of any evidence that  
 14 Bradley Edwards was ever aware of any such activities?  
 15 A. I'm going to have to --  
 16 MR. PIKE: Same objection.  
 17 THE WITNESS: -- assert the attorney/client  
 18 privilege to that, sir.  
 19 BY MR. SCAROLA:  
 20 Q. Do you have any knowledge that Bradley Edwards  
 21 ever participated in or was aware of actions that  
 22 utilized the judicial process, including, but not  
 23 limited to, unreasonable and unnecessary discovery for  
 24 the sole purpose of furthering a Ponzi scheme?  
 25 MR. PIKE: Same objection.

1 Amendment Rights as provided by the U.S.  
 2 Constitution.  
 3 BY MR. SCAROLA:  
 4 Q. Does a flight log kept for a private jet used  
 5 by you contain the names of celebrities, dignitaries or  
 6 International figures?  
 7 A. At least today, sir, I'm going to have to  
 8 respectfully decline to answer based on my Fifth, Sixth  
 9 and 14th Amendment Right, though I'd like to answer that  
 10 question.  
 11 Q. Have you ever had a personal relationship with  
 12 Donald Trump?  
 13 A. What do you mean by "personal relationship,"  
 14 sir?  
 15 Q. Have you socialized with him?  
 16 A. Yes, sir.  
 17 Q. Yes?  
 18 A. Yes, sir.  
 19 Q. Have you ever socialized with Donald Trump in  
 20 the presence of females under the age of 18?  
 21 A. Though I'd like to answer that question, at  
 22 least today I'm going to have to assert my Fifth, Sixth  
 23 and 14th Amendment Right, sir.  
 24 Q. Have you socialized with Alan Dershowitz?  
 25 A. Yes, sir. He's my attorney, as well as a

1 friend.  
 2 Q. Have you ever socialized with Alan Dershowitz  
 3 in the presence of females under the age of 18?  
 4 MR. PIKE: Form.  
 5 THE WITNESS: Sir, at least here today, I'm  
 6 going to have to assert my Fifth Amendment, Sixth  
 7 Amendment and 14th Amendment Rights.  
 8 BY MR. SCAROLA:  
 9 Q. Have you ever socialized with Tommy Mottola?  
 10 A. This is the type of questions where people who  
 11 have nothing to do with this case whatsoever have been  
 12 brought into the case by Mr. Edwards in an attempt to  
 13 simply imperil my relationships with social friends and  
 14 serves as an example of why this case has been brought  
 15 against Mr. Edwards and his firm, sir.  
 16 MR. PIKE: Form as well.  
 17 BY MR. SCAROLA:  
 18 Q. Well, do you know who brought those persons'  
 19 names into this lawsuit?  
 20 MR. PIKE: Form.  
 21 And just to be clear, what Mr. Scarola, I  
 22 believe, talking about this lawsuit, Epstein versus  
 23 RRA?  
 24 BY MR. SCAROLA:  
 25 Q. Yes, sir, that's the lawsuit I'm talking

1 this -- just this type of behavior, the answer is,  
 2 today, at least, I must assert my Fifth, Sixth and  
 3 14th Amendment Right, though I'd like to answer  
 4 each and every one of your questions, Mr. Scarola.  
 5 BY MR. SCAROLA:  
 6 Q. Have you had a social relationship with David  
 7 Copperfield?  
 8 A. As a reaction to, once again, the abusive  
 9 discovery process of bringing in names of people that  
 10 have absolutely nothing to do with any of Mr. Edwards',  
 11 Mr. Rothstein's or their clients' claims, by bringing in  
 12 the names of friends of mine strictly in an attempt to  
 13 stress my relationships, imperil my business  
 14 relationships, I'm going to say, yes, I do know  
 15 Mr. Copperfield.  
 16 Q. Have you ever socialized with David  
 17 Copperfield?  
 18 A. Again, as --  
 19 MR. PIKE: Form.  
 20 THE WITNESS: Sorry.  
 21 It's a typical Edwards/Rothstein strategy of  
 22 trying to involve well-known people in maliciously  
 23 fabricated cases in order to fleece investors out  
 24 of millions of dollars. They brought up names in  
 25 attempts at abuse of discovery process to try and

1 about. The one in which your deposition is being taken  
 2 today.  
 3 Do you know who brought those persons' names  
 4 into this lawsuit?  
 5 A. As a reaction, and only as a reaction to total  
 6 misbehavior on Mr. Edwards' part, and the Complaint was  
 7 obviously written by my attorneys, sir.  
 8 Q. So you know that those names are in your  
 9 Complaint, right?  
 10 A. Yes, sir.  
 11 Q. Okay. So because those names are in your  
 12 Complaint, I'm asking you about the people you named.  
 13 Have you had a social relationship with Tommy  
 14 Mottola?  
 15 A. The names in my Complaint are strictly as a  
 16 reaction to the abusive discovery process by  
 17 Mr. Edwards, his partners, Scott Rothstein, who sits in  
 18 jail, in an attempt to imperil my friendships.  
 19 But, yes, I have socialized with Mr. Mottola.  
 20 Q. Have you ever socialized with Mr. Mottola in  
 21 the presence of females under the age of 18?  
 22 MR. PIKE: Form.  
 23 THE WITNESS: At least today, the typical to  
 24 the Edwards contention of bringing cases of a  
 25 malicious nature where his partner sits in jail for

1 take discovery of people who have nothing to do  
 2 with this case.  
 3 Did I socialize with David Copperfield? The  
 4 answer is, yes.  
 5 BY MR. SCAROLA:  
 6 Q. Did you ever socialize with David Copperfield  
 7 in the presence of females under the age of 18?  
 8 A. I'm sure, again, this question is a typical  
 9 question of Mr. Edwards/Rothstein scheme to defraud  
 10 investors, asking questions knowing it serves no purpose  
 11 or relationship relevance to their case whatsoever.  
 12 At least today, though I'd like to answer that  
 13 question, on advice of my Counsel, and only on advice of  
 14 my Counsel, I'm going to have to assert my Fifth, Sixth  
 15 and 14th Amendment Right.  
 16 MR. PIKE: Form as well.  
 17 BY MR. SCAROLA:  
 18 Q. Have you ever had a social relationship with  
 19 Bill Richardson, Governor of New Mexico and formerly  
 20 U.S. Representative and Ambassador to the United  
 21 Nations?  
 22 MR. PIKE: Form.  
 23 THE WITNESS: As is typical of the Edwards  
 24 scheme, along with his partner, Scott Rothstein,  
 25 who sits in jail, what they attempted to do was

1 bring in any celebrity I might have known,  
2 well-known people, in an attempt to strictly  
3 imperil my relationships with these people where  
4 these people have no bearing whatsoever on any of  
5 their claims or cases.

6 Yes, I do have a social relationship.

7 BY MR. SCAROLA:

8 Q. Have you ever socialized with Mr. Richardson  
9 in the presence of females under the age of 18?

10 MR. PIKE: Form.

11 THE WITNESS: Again, typical of the  
12 Edwards/Rothstein scheme of bringing in well-known  
13 people, asking them ridiculous questions,  
14 ridiculous questions in an attempt strictly to  
15 imperil my relationships with these people where  
16 they have absolutely nothing to do with anything to  
17 do with Edwards, Rothstein or any of their alleged  
18 victims, the answer to your question is, yes, I  
19 have socialized.

20 BY MR. SCAROLA:

21 Q. Yes, but that wasn't my question.

22 My question was: Have you ever socialized  
23 with Mr. Richards in the presence of females under the  
24 age of 18?

25 MR. PIKE: Form.

1 question, I'm told by my Counsel that if I choose  
2 to do so, which is my preference, I risk losing  
3 their representation.

4 BY MR. SCAROLA:

5 Q. How many children have you sexually abused?

6 MR. PIKE: Form.

7 And I just want to be clear on the record.

8 These types of questions are argumentative and  
9 harassing. And, moreover, it's my contention that  
10 these types of questions are not related to this  
11 lawsuit by any stretch of the imagination. In this  
12 deposition, while I've been liberal in allowing  
13 these questions, are being utilized in an attempt  
14 to provoke a waiver of the Fifth Amendment Right.

15 There has been an Order entered by, I believe,  
16 Judge Hafele regarding these types of questions.

17 So with that caution, Mr. Scarola, I would ask  
18 you that you refrain from asking abusive and  
19 harassing questions that are not relevant to this  
20 case.

21 MR. SCAROLA: Well, it's very interesting that  
22 you claim they're not relevant when they are  
23 directly taken from the allegations in your  
24 Complaint.

25 And I agree with you that they are not

1 THE WITNESS: In response to your question,  
2 again, my full answer was, typical of the  
3 Edwards/Rothstein scheme to ask questions of a  
4 sexual charged nature, crafted cases, the U.S.  
5 Attorney has called his firm the largest fraud in  
6 U.S. history, fleecing investors out of millions of  
7 dollars by engaging in just these types of  
8 questions. Though I would like to answer each and  
9 every question about every one of these people, on  
10 advice of my Counsel today, I must take -- assert  
11 my Fifth Amendment, Sixth Amendment and 14th  
12 Amendment Right. Though I'd prefer to answer the  
13 question, I was told that if I choose to do so, I  
14 risk losing their representation, sir.

15 BY MR. SCAROLA:

16 Q. Have you ever sexually abused children?

17 MR. PIKE: Form.

18 THE WITNESS: On advice of Counsel, and only  
19 upon advice of Counsel, though I'd like to answer  
20 that question, as well as every other one of your  
21 claims brought by Mr. Edwards and his partner, who  
22 currently sits in jail, sir, I would like to answer  
23 those questions. But today at least, I have to  
24 assert my Sixth Amendment, 14th Amendment and Fifth  
25 Amendment Right. Though I'd prefer to answer the

1 relevant because there is no basis whatsoever for  
2 this claim against Mr. Edwards. But since you've  
3 made these baseless allegations, I am obliged to  
4 pursue the allegations by asking these questions.

5 So we'll move on from there. And whenever you  
6 think it's appropriate to terminate this deposition  
7 because you believe that I've acted  
8 inappropriately, be my guest.

9 MR. PIKE: I appreciate your invitation,  
10 Mr. Scarola.

11 I'm going to move to strike.

12 The fact is, Mr. Scarola, is that, these types  
13 of questions have already been ruled upon as being  
14 argumentative and harassing.

15 If you want to direct some questions relevant  
16 to your lawsuit, I invite you to do so. But  
17 attempting to use this deposition process as a  
18 mechanism to provoke a waiver of the Fifth  
19 Amendment and to obtain information that is more or  
20 potentially more relevant to Mr. Edwards' cases in  
21 which he is lead Counsel on, I think is improper.

22 BY MR. SCAROLA:

23 Q. Did you have staff members that assisted you  
24 in scheduling appointments with underage females; that  
25 is, females under the age of 18?

1 A. So along with many of the other claims that  
 2 the Rothstein firm crafted with malicious claims against  
 3 people like me and others of a sexually charged nature  
 4 in order to simply fleece investors out of millions of  
 5 dollars in South Florida, these types of questions,  
 6 though I'd like to answer today, at least this specific  
 7 question, I'm going to have to assert, unfortunately, my  
 8 Fifth, Sixth and 14th Amendment Right, though I'd prefer  
 9 to answer the question.  
 10 BY MR. SCAROLA:  
 11 Q. Who are the others referred to in that  
 12 response?  
 13 A. Again, sir?  
 14 Q. You said you and others. Who are the others  
 15 that you were referring to?  
 16 A. You'll have to read my answer back.  
 17 MR. PIKE: I'm sorry. Madame Court Reporter,  
 18 would you please read the witness' answer back?  
 19 THE WITNESS: You'll have to -- I have to take  
 20 a bathroom break.  
 21 MR. PIKE: Actually I don't -- one second.  
 22 For the record, we're going on 12:30 now. Is  
 23 there -- do you have a time frame as to when you --  
 24 MR. SCAROLA: About a half hour.  
 25 MR. PIKE: You have a half hour left?

1 MR. SCAROLA: Uh-huh.  
 2 MR. PIKE: Okay. Do you have an objection to  
 3 us taking a quick bathroom break and --  
 4 THE WITNESS: I'll just walk out and back in.  
 5 MR. SCAROLA: If Mr. Epstein needs to go to  
 6 the bathroom, Mr. Epstein needs to go to the  
 7 bathroom.  
 8 THE WITNESS: Thank you, sir.  
 9 MR. PIKE: Then we're off the record?  
 10 VIDEOGRAPHER: We're off the record.  
 11 (Brief recess.)  
 12 VIDEOGRAPHER: We are back on video record at  
 13 12:43 p.m.  
 14 BY MR. SCAROLA:  
 15 Q. I think when we went off the record you had  
 16 requested that the last answer that you gave and the  
 17 question asked of you based on that answer be read back,  
 18 so we'll start there.  
 19 MR. PIKE: Madame Court Reporter.  
 20 (Previous question and answer were read.)  
 21 THE WITNESS: Sounds like a complete answer to  
 22 me.  
 23 BY MR. SCAROLA:  
 24 Q. No, sir. My question to you following that  
 25 answer was: Who are the others to whom you made

1 reference in that response? You said, "me and others."  
 2 Who are the others?  
 3 A. Can you repeat where it says me and others?  
 4 I'm sorry.  
 5 MR. SCAROLA: Read it back again, please,  
 6 Sandy.  
 7 (Answer was read.)  
 8 THE WITNESS: The others are people reported  
 9 in the press to be many people in South Florida who  
 10 were the victims of the Rothstein scam.  
 11 I'm glad -- I'm happy to answer the others.  
 12 I'd like to know the others. In fact, we've  
 13 subpoenaed documents from the bankruptcy trustee of  
 14 Brad Edwards' firm in an attempt to find out more  
 15 details of the others that you've just asked about.  
 16 People -- I believe the Attorney Scherer has  
 17 filed a Complaint for some of the others who have  
 18 been defrauded, as well as some of the investors  
 19 who were told about many others, sir.  
 20 BY MR. SCAROLA:  
 21 Q. So you don't know any names; is that correct?  
 22 MR. PIKE: Form. Move to strike.  
 23 Mischaracterizes the witness' testimony.  
 24 THE WITNESS: I'm sure that's an -- it's an  
 25 easy way of saying that as a response to the

1 questions and subpoenas we've asked Mr. Edwards to  
 2 produce so we can find out the specific names of  
 3 the others who have been -- the U.S. Attorney has  
 4 claimed have been blackmailed and victims of the  
 5 Rothstein firm.  
 6 I'd be happy, and hopefully at the end of this  
 7 trial everyone will know some of the names of the  
 8 others, sir.  
 9 BY MR. SCAROLA:  
 10 Q. Do you know the names of any of the others?  
 11 A. No, sir, I do not. However, the U.S.  
 12 Attorney, we believe, is going to file more charges  
 13 against Mr. Roth -- Mr. Edwards' partners. And  
 14 Mr. Scherer and us have subpoenaed the bankruptcy  
 15 trustee for the names of the others.  
 16 So sitting here today, I do not. Hopefully  
 17 sometime before trial we will have names of the others,  
 18 sir.  
 19 Q. Have you ever pled guilty to any criminal  
 20 wrongdoing?  
 21 A. Yes, sir.  
 22 Q. What criminal wrongdoing did you plead guilty  
 23 to?  
 24 A. A solicitation of prostitution and procuring a  
 25 minor for prostitution, sir.

1 Q. On how many occasions did you solicit  
 2 prostitution?  
 3 A. Under -- excuse me? Again?  
 4 Q. On how many occasions did you solicit  
 5 prostitution?  
 6 A. At least sitting here today, I'm going to have  
 7 to, on advice of Counsel, assert my Fifth Amendment,  
 8 16th Amendment (sic) and Fourth (sic) Amendment Right.  
 9 Q. On how many occasions did you plead guilty to  
 10 soliciting prostitution?  
 11 A. Once, sir.  
 12 Q. How many acts of solicitation of prostitution  
 13 did you plead guilty to?  
 14 A. Three.  
 15 Q. What are the names of the individuals who you  
 16 pled guilty to soliciting as prostitutes?  
 17 A. I do not know.  
 18 Q. When did those acts occur?  
 19 A. I do not know.  
 20 Q. How many prostitutes have you solicited?  
 21 MR. PIKE: Form.  
 22 THE WITNESS: On advice of Counsel, at least  
 23 sitting here today, sir, I'd like to answer each  
 24 one of those questions. However, today I'm going  
 25 to have to assert my Fifth, Sixth and 14th

1 MR. PIKE: Form. And relevance.  
 2 BY MR. SCAROLA:  
 3 Q. How many minors have you procured for  
 4 prostitution?  
 5 MR. PIKE: Form.  
 6 THE WITNESS: On advice of Counsel, sir, I'm  
 7 going to have to assert my Fifth, Sixth and 14th  
 8 Amendment Right, though I pled guilty to procuring  
 9 a single minor.  
 10 BY MR. SCAROLA:  
 11 Q. Yes, but my question wasn't about what you  
 12 pled guilty to. I just want to know how many minors you  
 13 have procured for prostitution.  
 14 MR. PIKE: Asked and answered.  
 15 THE WITNESS: Again, at least with respect to  
 16 what I've pled guilty to, I pled guilty to  
 17 procuring a single minor.  
 18 With respect to the rest of your question, I'm  
 19 going to have to assert my Fifth, Sixth and 14th  
 20 Amendment Rights as provided by my Counsel.  
 21 BY MR. SCAROLA:  
 22 Q. When did you procure the minor for  
 23 prostitution as to which procurement you pled guilty?  
 24 MR. PIKE: Form.  
 25 THE WITNESS: I don't know.

1 Amendment Right.  
 2 BY MR. SCAROLA:  
 3 Q. Who are the minors who you solicited for  
 4 prostitution?  
 5 MR. PIKE: Form.  
 6 THE WITNESS: Who are the -- I pled guilty to  
 7 soliciting prostitution. There was no soliciting  
 8 minors charge, sir.  
 9 MR. SCAROLA: Could you read back the response  
 10 to the question about what Mr. Epstein pled guilty  
 11 to, please?  
 12 MR. PIKE: About four questions back.  
 13 (Previous question and answer were read.)  
 14 MR. PIKE: And his answer?  
 15 MR. SCAROLA: That was his answer.  
 16 BY MR. SCAROLA:  
 17 Q. Who are the minors who you procured for  
 18 prostitution?  
 19 MR. PIKE: Form.  
 20 THE WITNESS: I believe if you -- my answer  
 21 was procuring a minor, sir, not minors.  
 22 BY MR. SCAROLA:  
 23 Q. Who is the minor that you procured for  
 24 prostitution?  
 25 A. I do not know.

1 BY MR. SCAROLA:  
 2 Q. Was there a time before you entered your  
 3 guilty plea when you knew the identity of the  
 4 prostitutes that you solicited?  
 5 MR. PIKE: Form.  
 6 THE WITNESS: Again?  
 7 BY MR. SCAROLA:  
 8 Q. Was there a time before the entry of your  
 9 guilty plea when you knew the identity of the  
 10 prostitutes you solicited?  
 11 MR. PIKE: Form.  
 12 THE WITNESS: I don't recall.  
 13 BY MR. SCAROLA:  
 14 Q. Was there a time before the entry of your  
 15 guilty plea when you knew the identity of the minor that  
 16 you pled guilty to procuring for prostitution?  
 17 MR. PIKE: Form.  
 18 THE WITNESS: I don't know.  
 19 BY MR. SCAROLA:  
 20 Q. Did you plead guilty because you were, in  
 21 fact, guilty?  
 22 MR. PIKE: Form.  
 23 That's attorney/client, work product.  
 24 Attorney/client.  
 25 MR. SCAROLA: I haven't asked anything about

1 any communication.

2 MR. PIKE: It definitely could get into a  
3 communication with Mr. Epstein's lawyers at the  
4 time of the criminal proceeding.

5 MR. SCAROLA: No, sir, it can't.

6 BY MR. SCAROLA:

7 Q. I want to know whether you pled guilty because  
8 you were, in fact, guilty.

9 A. I'm going to have to assert my Fifth, Sixth  
10 and 14th Amendment, sir.

11 Q. Do you understand the term John to be a slang  
12 reference to the customer of a prostitute?

13 MR. PIKE: Form.

14 THE WITNESS: Yes, sir.

15 BY MR. SCAROLA:

16 Q. How many times were you one of [REDACTED]'s  
17 customers?

18 MR. PIKE: Form.

19 THE WITNESS: [REDACTED]'s customers.

20 You'll have to rephrase the question, sir.

21 BY MR. SCAROLA:

22 Q. Your Complaint says --

23 MR. PIKE: What page were you reading from?

24 MR. SCAROLA: Page 22.

25 MR. PIKE: Thank you.

1 crafting cases of a sexual nature against people in  
2 South Florida, me and others, the others yet to be  
3 determined. However, today, though I'd like to  
4 answer every one of his questions, on advice of  
5 Counsel, at least today, I'm going to have to  
6 assert my Fifth, Sixth and 14th Amendment Right.

7 BY MR. SCAROLA:

8 Q. How many times have you engaged in fondling  
9 underage females?

10 MR. PIKE: Form.

11 THE WITNESS: This is relevance here at some  
12 point?

13 MR. PIKE: To the extent you can answer the  
14 question.

15 THE WITNESS: Again, as another one of the  
16 irrelevant questions asked of this lawsuit with  
17 respect as a client how I was abused by the  
18 Rothstein firm for his -- the practices, the abuse  
19 of the legal system, the -- hopefully, the ladies  
20 and gentlemen of the jury will be able to see  
21 through some of these ridiculous questions with  
22 respect to questions that today, at least, I must  
23 take the Fifth, Sixth and 14th Amendment, but I  
24 believe are obvious to the ladies and gentlemen of  
25 the jury what you're trying to do here,

1 BY MR. SCAROLA:

2 Q. Paragraph 46(a), last sentence: "Under the  
3 circumstances, her claim for damages against Epstein,  
4 one of [REDACTED]'s many Johns during that same period," et  
5 cetera.

6 You have identified yourself in this Complaint  
7 as one of [REDACTED]'s many Johns, which you acknowledge to be  
8 a reference to a customer of a prostitute.

9 How many times were you one of [REDACTED]'s  
10 customers for purposes of prostitution?

11 A. Well, now that you've now put on the record  
12 that [REDACTED], I believe, in her deposition is an admitted  
13 prostitute, I would like to answer that question, but on  
14 advice of Counsel, sir, I'm going to have to  
15 respectfully decline. But I am happy to hear you  
16 finally admit it in your own questions that your [REDACTED] is  
17 an admitted prostitute.

18 MR. SCAROLA: Move to strike. Unresponsive.

19 BY MR. SCAROLA:

20 Q. Have you ever coerced, induced or enticed any  
21 minor to engage in any sexual act with you?

22 MR. PIKE: Form.

23 THE WITNESS: A typical question from  
24 Mr. Scarola representing Mr. Edwards and the firm  
25 of Rothstein, who Scott Rothstein sits in jail for

1 Mr. Scarola.

2 MR. SCAROLA: Move to strike. Unresponsive.

3 MR. PIKE: No. That's fine.

4 BY MR. SCAROLA:

5 Q. How many times have you engaged in illegal  
6 sexual touching of minors?

7 MR. PIKE: Form. Relevance.

8 THE WITNESS: Again, an irrelevant question to  
9 this lawsuit, strictly as a continued attempt to  
10 bring in irrelevant facts to the fact of what the  
11 Rothstein firm has done to both me and others in  
12 South Florida, defrauding investors of millions of  
13 dollars, knowing that at least today I'm going to  
14 have to with respect to that particular question  
15 assert my Fourth -- excuse me -- Fifth, Sixth and  
16 14th Amendment Rights.

17 MR. SCAROLA: Move to strike as unresponsive.

18 MR. PIKE: Mr. Scarola, he's answering your  
19 question. You're asking abusive and harassing  
20 questions that are unrelated to this lawsuit.

21 If you can direct me to anywhere in the  
22 Complaint that even remotely addresses your two  
23 questions that you've just posed to Mr. Epstein,  
24 I'd be happy to look at the section in the  
25 Complaint. But moving to strike the witness'

1 answer when he's answering your abusive and  
 2 harassing questions is improper.  
 3 BY MR. SCAROLA:  
 4 Q. How many times have you engaged in oral sex  
 5 with females under the age of 18?  
 6 MR. PIKE: Objection. Relevance. Abusive and  
 7 harassing. Not reasonably calculated to lead to  
 8 discovery of admissible evidence in this case.  
 9 THE WITNESS: A typical question posed by  
 10 Mr. Scarola in an attempt to divert the attention  
 11 away from the wrongdoing of Bradley Edwards, his  
 12 partner, Scott Rothstein, who sits in jail for  
 13 defrauding investors of South Florida of millions  
 14 of dollars, by crafting malicious cases of a sexual  
 15 nature just in order to fleece investors, called by  
 16 the U.S. Attorney one of the largest frauds in  
 17 South Florida's history.  
 18 Mr. Scarola, as I would like to respond to the  
 19 questions regarding of your underage girls, the  
 20 fondling or the other questions you've asked me  
 21 here today, unfortunately, I cannot on advice of  
 22 Counsel answer those questions, so I must assert my  
 23 Fifth, Sixth and 14th Amendment Rights, though  
 24 these questions are totally irrelevant to this  
 25 lawsuit.

1 MR. SCAROLA: Move to strike as unresponsive.  
 2 BY MR. SCAROLA:  
 3 Q. Do you have a personal sexual preference for  
 4 children?  
 5 MR. PIKE: Form. Relevance. Abusive.  
 6 Harassing. Not reasonably calculated to lead to  
 7 the discovery of admissible evidence in this case.  
 8 THE WITNESS: Another totally irrelevant  
 9 question to this lawsuit, Mr. Edwards' behavior, in  
 10 an attempt to strictly divert attention from the  
 11 wrongdoing of the Rothstein firm in this matter by  
 12 asking sexually charged questions in a case where  
 13 the Rothstein firm has been charged by the U.S.  
 14 Attorney of fabricating claims of a malicious  
 15 nature, hiding behind attorney/client privilege,  
 16 forging documents -- excuse me -- but as with  
 17 respect to these questions designed for nothing  
 18 more than to harass me, Mr. Scarola, I'm going to  
 19 have to, unfortunately, take the Fifth, Sixth and  
 20 14th Amendment.  
 21 MR. SCAROLA: Move to strike as unresponsive.  
 22 BY MR. SCAROLA:  
 23 Q. Have you ever acted on a sexual preference for  
 24 children?  
 25 MR. PIKE: Form. Irrelevant. Abusive.

1 Harassing. And not reasonably calculated to lead  
 2 to admissible evidence in this case.  
 3 THE WITNESS: One more of Mr. Scarola's  
 4 irrelevant questions designed nothing more to try  
 5 to harass me, to divert attention from the fact  
 6 that Mr. Edwards and his firm perpetrated one of  
 7 the largest frauds in South Florida's history by  
 8 using people like me and others in an attempt to  
 9 fleece South Florida investors out of millions of  
 10 dollars, where the U.S. Attorney has accused his  
 11 firm of being the largest criminal enterprise in  
 12 South Florida's history, where Mr. Edwards' partner  
 13 sits in prison, potentially for the rest of his  
 14 life.  
 15 I'd like to answer all of your questions here  
 16 today, Mr. Scarola, even though they're irrelevant;  
 17 however, on advice of Counsel, at least today, I'm  
 18 going to have to assert my Fifth, Sixth and 14th  
 19 Amendment Right.  
 20 MR. SCAROLA: Move to strike as unresponsive.  
 21 BY MR. SCAROLA:  
 22 Q. Your Complaint at page 27, paragraph 49, says  
 23 that: "RRA and the litigation team took an emotionally  
 24 driven set of facts involving alleged innocent,  
 25 unsuspecting, underage females and a Palm Beach

1 billionaire, and sought to turn it into a gold mine,"  
 2 end of quote.  
 3 Who is the Palm Beach billionaire referred to  
 4 in that sentence?  
 5 A. On advice of Counsel today, Mr. Scarola,  
 6 though I would like to answer each one of your  
 7 questions, I'm going to have to assert my Fifth, Sixth  
 8 and 14th Amendment Right.  
 9 Q. What is the emotionally driven set of facts to  
 10 which you make reference in that sentence?  
 11 A. It's the same set of facts that were used by  
 12 the Rothstein firm to fleece unsuspecting investors out  
 13 of millions of dollars, crafting, fabricating malicious  
 14 cases of a sexually charged nature with no fundamental  
 15 basis whatsoever, reported wildly by the press. The  
 16 U.S. Attorney has accused Mr. Edwards' partner of not --  
 17 excuse me -- Mr. Edwards' partner sits currently in  
 18 jail, pled guilty to some of these charges. There are  
 19 other members of his firm under investigation for just  
 20 these types of questions and fabrications.  
 21 But, however, today, though I'd like to answer  
 22 every one of your questions with specificity, on advice  
 23 of Counsel I'm not going to be able to, Mr. Scarola, and  
 24 respectfully decline based on my Fifth, Sixth and 14th  
 25 Amendment Right.

1 Q. What day are you prepared to answer all these  
 2 questions?  
 3 MR. PIKE: Form. Attorney/client and work  
 4 product.  
 5 THE WITNESS: That's attorney -- I wish I  
 6 could answer that question as well, but it's  
 7 attorney/client privilege, sir.  
 8 BY MR. SCAROLA:  
 9 Q. Your Complaint says that: "Rather than  
 10 evaluating and resolving the cases based on the merits,"  
 11 open parens, "i.e., facts," close parens, "which  
 12 included knowledgeable, voluntary and consensual actions  
 13 by each of the claimants," et cetera.  
 14 Who are the claimants that are referenced  
 15 there?  
 16 A. It's -- I'm sorry. You have to repeat the  
 17 question.  
 18 Q. Yes, sir. Your Complaint says: --  
 19 MR. PIKE: Page?  
 20 Q. -- "rather than evaluating" --  
 21 MR. PIKE: Can you give me a page, sir?  
 22 MR. SCAROLA: Page 27, paragraph 49, second  
 23 sentence.  
 24 BY MR. SCAROLA:  
 25 Q. Quote, "rather than evaluating and resolving

1 the cases based on the merits, that is, facts which  
 2 included knowledgeable, voluntary and consensual actions  
 3 by each of the claimants."  
 4 A. Yes.  
 5 Q. Who are the claimants that you're referencing  
 6 there?  
 7 A. They're the prostitutes you referred to in the  
 8 past, sir.  
 9 Q. What are their names?  
 10 A. I think the prostitutes' names were -- the  
 11 prostitute that you described before was [REDACTED].  
 12 With respect to the others, I'm going to have  
 13 to claim the Fifth, Sixth and 14th Amendment, sir.  
 14 Q. So one of the individuals that you're  
 15 referencing there is [REDACTED]; is that correct?  
 16 A. It's -- the individual I've referenced is a  
 17 person who filed a claim against me.  
 18 Q. Is it [REDACTED]?  
 19 A. It is [REDACTED], as far as I know from the claim,  
 20 sir.  
 21 Q. Okay. So one of the people that you're  
 22 referring to is [REDACTED], who you've identified as [REDACTED]; is  
 23 that correct?  
 24 A. With respect to that question, sir, on advice  
 25 of Counsel, I'm going to have to assert my Fifth, Sixth

1 and 14th Amendment.  
 2 Q. What are the voluntary and consensual actions  
 3 by [REDACTED] that you are referencing there?  
 4 A. Sir, though I'd like to answer each one of  
 5 your questions here today, I'm going to have to  
 6 respectfully decline based on advice of my Counsel, and  
 7 have to assert my Fifth, Sixth and 14th Amendment Right.  
 8 Q. What are the damages that you claim to have  
 9 suffered as a consequence of any wrongdoing on the part  
 10 of Bradley Edwards?  
 11 MR. PIKE: Form.  
 12 THE WITNESS: The cost of ridiculous  
 13 litigation, of having my attorneys prepare  
 14 responses to wildly irrelevant discovery in various  
 15 locations at a minimum, sir.  
 16 BY MR. SCAROLA:  
 17 Q. Which lawyers?  
 18 A. Burman Critton, Jack Goldberger, and a bunch  
 19 of the others, sir.  
 20 Q. Which ones? Name them for me, please.  
 21 A. Specifically -- I have so many lawyers  
 22 defending me here against Mr. Edwards, I can't sit  
 23 here -- at the moment I can't recall it with  
 24 specificity.  
 25 Q. You don't remember any of your lawyers' names?

1 A. Oh, I do.  
 2 Q. Besides Mr. -- besides the Burman Critton firm  
 3 and Mr. Goldberger?  
 4 A. Are you asking me for the firm, sir, or are  
 5 you asking me for the names?  
 6 Q. I want as much information as you can give me  
 7 about this element of damage which you claim; and, that  
 8 is, the cost of legal services that you claim to be  
 9 damages in this case.  
 10 A. Okay.  
 11 MR. PIKE: Form. And move to strike.  
 12 THE WITNESS: Mr. Roy Black.  
 13 BY MR. SCAROLA:  
 14 Q. Okay. Who else?  
 15 A. Mr. Marty Weinberger. Mr. Alan Dershowitz.  
 16 Mr. Jay Lefkowitz. The firm of Burman Critton Luttier.  
 17 That's it for the moment.  
 18 Q. How much have you paid the law firm of Burman  
 19 Critton and Luttier which you claim is damages?  
 20 A. Hundreds of thousands of dollars, sir.  
 21 Q. How much?  
 22 A. I don't have that figure offhand.  
 23 Q. Can you give us any better figure than  
 24 hundreds of thousands of dollars?  
 25 A. No, not sitting here today.

1 Q. Are you paying them on an hourly basis?  
 2 A. Yes, sir.  
 3 Q. What is the hourly rate at which you are  
 4 compensating members of the law firm?  
 5 A. They're ordinary rates.  
 6 Q. What are they?  
 7 A. I don't know.  
 8 Q. How much have you paid Mr. Goldberger?  
 9 A. I'm not aware total amount, sir.  
 10 Q. What is the hourly rate at which you're paying  
 11 Mr. Goldberger?  
 12 A. His normal hourly rate.  
 13 Q. How much is that?  
 14 A. I don't know.  
 15 Q. How much have you paid Mr. Black which you  
 16 claim as damages in this case?  
 17 A. Hundreds of thousands of dollars.  
 18 Q. Are you paying him on an hourly basis?  
 19 A. I believe so.  
 20 Q. What is the hourly rate?  
 21 A. I'm not -- I do not know, sir.  
 22 Q. How much have you paid Marty Weinberger?  
 23 A. I don't know the exact amount, sir.  
 24 Q. What's your best estimate?  
 25 A. More than a hundred thousand dollars.

1 Q. Are you paying him on an hourly basis?  
 2 A. I believe so.  
 3 Q. What's the hourly rate?  
 4 A. I don't know, sir.  
 5 Q. How much have you paid Alan Dershowitz?  
 6 A. Hundreds of thousands of dollars.  
 7 Q. Are you paying him on an hourly basis?  
 8 A. I believe so.  
 9 Q. At what hourly rate?  
 10 A. I don't know, sir.  
 11 Q. How much are you paying Jay -- how much have  
 12 you paid Jay Lefkowitz?  
 13 A. I'm not sure, sir.  
 14 Q. Do you have any idea at all?  
 15 A. More than a hundred thousand dollars.  
 16 Q. Are you paying him on an hourly basis?  
 17 A. Yes, sir.  
 18 Q. What's the hourly rate?  
 19 A. I don't know.  
 20 Q. What is the form of payment to your lawyers?  
 21 How do you transfer money to them?  
 22 A. I don't know, sir.  
 23 MR. PIKE: Form.  
 24 BY MR. SCAROLA:  
 25 Q. Pardon me?

1 A. I don't know.  
 2 Q. Does someone do that on your behalf?  
 3 A. I would guess so.  
 4 Q. Who?  
 5 A. I don't know.  
 6 MR. PIKE: Form.  
 7 BY MR. SCAROLA:  
 8 Q. Who are the people who are authorized to make  
 9 payment on your behalf?  
 10 A. With respect to that question, I'm going to  
 11 have to assert the Fifth, Sixth and 14th Amendment, sir.  
 12 Q. Are there any other elements of damage, apart  
 13 from the money paid to lawyers?  
 14 A. Yes, sir.  
 15 Q. What?  
 16 A. The stress and emotional damage of imperiling  
 17 my friendships and business relationships with no  
 18 relevance whatsoever to these cases, brought by a firm  
 19 that whose partner sits in a Federal prison, who engaged  
 20 in discovery to harass my friends and social contacts  
 21 with no consideration or relevance to this case  
 22 whatsoever, in an attempt to simply fleece -- partly  
 23 fleece investors in South Florida out of millions of  
 24 dollars, sir.  
 25 Q. What is the value of those losses?

1 MR. PIKE: Form.  
 2 THE WITNESS: I'm not sure yet, sir.  
 3 BY MR. SCAROLA:  
 4 Q. Do you have any idea at all?  
 5 A. Not sitting here today.  
 6 Q. More or less than \$10?  
 7 MR. PIKE: Form.  
 8 THE WITNESS: I would guess it's more than  
 9 \$10, sir.  
 10 BY MR. SCAROLA:  
 11 Q. More or less than a hundred?  
 12 A. I would guess it's quite an amount of money.  
 13 Q. Is it more or less than a hundred?  
 14 A. Yes, sir.  
 15 Q. More or less than a thousand?  
 16 A. I would say it's more than 150,000.  
 17 Q. More or less than a million?  
 18 A. I don't know, sir.  
 19 Q. So somewhere between 150,000 and a million?  
 20 A. No, sir. It's not --  
 21 MR. PIKE: Form. Mischaracterizes the  
 22 witness' testimony.  
 23 THE WITNESS: No, sir. That's not what I  
 24 said. I said, I did not know.  
 25 BY MR. SCAROLA:

1 Q. Maybe more than a million?  
 2 A. Maybe.  
 3 Q. More or less than a billion?  
 4 MR. PIKE: Form.  
 5 THE WITNESS: I don't know.  
 6 BY MR. SCAROLA:  
 7 Q. Maybe more than a billion?  
 8 A. Maybe more.  
 9 Q. How are you going to go about finding out what  
 10 the value of that loss is?  
 11 MR. PIKE: Attorney/client, work product.  
 12 To the extent you can answer without  
 13 disclosing our conversations or the conversations  
 14 with your other attorneys that you've delineated,  
 15 you can do so.  
 16 BY MR. SCAROLA:  
 17 Q. Or you can just take the signal and say, I  
 18 refuse to answer because it's attorney/client privilege.  
 19 A. I resent that.  
 20 MR. PIKE: Move to strike.  
 21 THE WITNESS: But it's okay. You can continue  
 22 to try to harass me, sir. It doesn't work. The  
 23 ladies and gentlemen of the jury, hopefully when  
 24 they see the deposition will recognize and see  
 25 these pile of tricks. The answer --

1 BY MR. SCAROLA:  
 2 Q. Do you attribute all of the damages that you  
 3 have described to Mr. Edwards' conduct?  
 4 MR. PIKE: Form.  
 5 THE WITNESS: As a participant -- I don't know  
 6 how to proportion the conduct as opposed to  
 7 Mr. Edwards and his partner who sits in jail. I  
 8 guess the U.S. Attorney will also make a decision  
 9 to how much the conduct and proportion is relevant  
 10 to both damages and anything else he's done in this  
 11 case, sir.  
 12 BY MR. SCAROLA:  
 13 Q. But I'm not asking you about what the U.S.  
 14 Attorney's opinion is.  
 15 I want to know whether you hold Mr. Edwards  
 16 responsible for all of those elements of damage that you  
 17 have described to us.  
 18 A. It's a difficult question to answer,  
 19 Mr. Scarola.  
 20 Q. No, it's easy. Yes, no, or I don't know.  
 21 MR. PIKE: Mr. Scarola, you know as well as I  
 22 do, the witness is attempting to answer your  
 23 question.  
 24 MR. SCAROLA: I don't think so. I think he's  
 25 attempting to evade all of my questions.

1 MR. SCAROLA: Hopefully they will.  
 2 THE WITNESS: Yes.  
 3 MR. PIKE: Move to strike.  
 4 THE WITNESS: I will respectfully decline to  
 5 answer that.  
 6 BY MR. SCAROLA:  
 7 Q. On what basis?  
 8 A. Attorney/client privilege.  
 9 MR. PIKE: And work product.  
 10 BY MR. SCAROLA:  
 11 Q. Any other elements of damage?  
 12 A. Not -- there might be, but sitting here today,  
 13 I can't think of them.  
 14 Q. Do you have written contracts with any of your  
 15 lawyers?  
 16 A. I don't know.  
 17 Q. Who does?  
 18 A. I don't know.  
 19 MR. SCAROLA: Let's take a short break. We  
 20 may be finished.  
 21 VIDEOGRAPHER: We are now off the record at  
 22 1:12 p.m.  
 23 (Brief recess.)  
 24 VIDEOGRAPHER: We are back on video record at  
 25 1:18 p.m.

1 MR. PIKE: And I understand your contention.  
 2 However, if you would, allow Mr. Epstein to finish  
 3 his response.  
 4 THE WITNESS: Could you repeat your question?  
 5 BY MR. SCAROLA:  
 6 Q. Do you hold Mr. Edwards responsible for all of  
 7 the damages that you have described?  
 8 MR. PIKE: Form.  
 9 THE WITNESS: It's difficult for me to  
 10 proportion the damages that I have described  
 11 between Mr. Edwards, his partner, who is currently  
 12 in jail, his -- the other people named in the  
 13 Complaint. Hopefully a jury will do that.  
 14 BY MR. SCAROLA:  
 15 Q. Do you hold [REDACTED] responsible for all of the  
 16 damages you have described?  
 17 MR. PIKE: Form.  
 18 THE WITNESS: Again, these questions, these  
 19 ambiguous questions, as opposed to who  
 20 participated, I would let Mr. Edwards and his  
 21 clients and his partners decide whose proportionate  
 22 responsibility it is, sir.  
 23 BY MR. SCAROLA:  
 24 Q. So you defer to them?  
 25 MR. PIKE: Form.

1 THE WITNESS: As proportionate to the amount  
2 of damages, I think Mr. Edwards played a vital  
3 role. I believe his partners potentially played a  
4 role. I've only had any contact with Mr. Edwards,  
5 sir.

6 BY MR. SCAROLA:

7 Q. Which partners?

8 A. Beg your pardon?

9 Q. Which partners, besides Mr. Edwards and  
10 Mr. Rothstein, do you claim engaged in conduct that  
11 renders them liable to you?

12 A. I believe it's in the Complaint, sir. And I  
13 believe it's Mr. Adler, Mr. Berger. There's Mr. Jenne,  
14 Mr. Fisten, but those are not partners.

15 So Mr. Berger, Mr. Adler -- and I forgot the  
16 names of the others at the moment, sir, but it's in the  
17 Complaint.

18 Q. Why didn't you sue them?

19 MR. PIKE: Form.

20 THE WITNESS: Attorney/client privilege, sir.

21 MR. PIKE: Work product.

22 MR. SCAROLA: I have no further questions.

23 MR. EDWARDS: I have three or four questions.  
24 That's it.

25 MR. PIKE: Okay. I just want to be clear for

1 contention on the record.

2 Okay.

3 CROSS EXAMINATION

4 BY MR. EDWARDS:

5 Q. Mr. Epstein, is your sole basis for your claim  
6 against [REDACTED] that she changed her testimony from the  
7 time she testified to the FBI in 2007?

8 MR. PIKE: Form. To the extent you can answer  
9 that question without invading attorney/client,  
10 work product, you can do so.

11 THE WITNESS: Unfortunately, I'd like to  
12 answer that question, but I can't do so without  
13 invading attorney/client privilege.

14 BY MR. EDWARDS:

15 Q. Is there anything in [REDACTED]'s Complaint that was  
16 filed against you in September of 2008 which you contend  
17 to be false?

18 MR. PIKE: Asked and answered.

19 THE WITNESS: I recognize, Mr. Edwards, again,  
20 the concept of attempting me to get to waive my  
21 Fifth Amendment privilege; however, in this lawsuit  
22 I've answered questions with respect to your  
23 lawsuit. And with regard to the question you just  
24 asked, I'm going to have to, unfortunately, assert  
25 my Fifth Amendment, Sixth Amendment and 14th

1 the record. Mr. Scarola represents Mr. Edwards in  
2 this case; is that correct, Mr. Scarola?

3 MR. EDWARDS: That's correct.

4 MR. SCAROLA: Yes.

5 MR. PIKE: And in this particular case,  
6 Epstein versus Rothstein, et al, Mr. Edwards, who  
7 do you specifically represent?

8 MR. EDWARDS: [REDACTED]

9 MR. PIKE: Okay. I believe that if you follow  
10 through with questioning, you have an  
11 irreconcilable conflict with regard to the other  
12 case in which you represent [REDACTED] and [REDACTED].

13 I cannot stop you from asking any questions;  
14 however, if you do move forward with asking  
15 questions, I will take the appropriate action.

16 MR. SCAROLA: And on behalf -- on behalf of my  
17 client --

18 MR. PIKE: Yes, sir.

19 MR. SCAROLA: -- we do not accept your  
20 assessment of Mr. Edwards' ethical  
21 responsibilities.

22 MR. PIKE: That is absolutely fine for you to  
23 do that. I just wanted to put it on the record  
24 that I am, by no means, going to prevent you from  
25 questioning today. However, I wanted to put my

1 Amendment Right.

2 But I'm willing to listen to any other  
3 questions you may have.

4 MR. EDWARDS: Finished.

5 MR. PIKE: I have a couple questions.

6 CROSS EXAMINATION

7 BY MR. PIKE:

8 Q. Mr. Epstein, earlier in the deposition  
9 Mr. Scarola was reading from page 2 of the Complaint  
10 filed in the Epstein versus Rothstein, Rosenfeldt and  
11 Adler, et al. Do you recall that?

12 A. Yes, sir.

13 Q. And then I showed you page 2 of a Complaint  
14 that I had my notes on, correct?

15 A. Yes.

16 Q. Did you read the black type or did you read  
17 the handwritten notes in the corners of the Complaint,  
18 that particular page that I showed you?

19 A. Unfortunately, my eyesight is not good enough  
20 to read the notes. I only read the black letter.

21 Q. And it was that one sentence, correct?

22 A. It was two sentences, I believe, but, yes.

23 MR. PIKE: Thank you.

24 We'll read.

25 REDIRECT EXAMINATION

1 BY MR. SCAROLA:  
 2 Q. What is your eyesight?  
 3 A. Sorry?  
 4 Q. What is your eyesight?  
 5 A. My eyesight?  
 6 Q. Yes, sir. You said that your eyesight was not  
 7 good enough to be able to read the handwritten  
 8 notations. What is your eyesight?  
 9 A. Are we on the record or off?  
 10 Q. We're on the record.  
 11 MR. PIKE: We're on the record.  
 12 THE WITNESS: I need 3.5 glasses.  
 13 BY MR. SCAROLA:  
 14 Q. And you had those on when you were reading the  
 15 Complaint, didn't you?  
 16 A. But these aren't my 3.5s, sir.  
 17 Q. What are they?  
 18 A. I don't know.  
 19 Q. Let's hand them over, if you would. Let's  
 20 take a look at them.  
 21 A. Sure.  
 22 Do you see anything?  
 23 Q. No.  
 24 Is it your contention that those glasses were  
 25 inadequate to enable you to read the handwritten

1 to read the handwritten notations; is that correct?  
 2 MR. PIKE: Form.  
 3 THE WITNESS: In this particular instance,  
 4 sir, these glasses did not. I'm not saying they  
 5 cannot, but did not allow me to read the notes,  
 6 that's correct.  
 7 MR. SCAROLA: I would like those glasses  
 8 marked as an Exhibit to this deposition.  
 9 MR. PIKE: I don't think so.  
 10 MR. SCAROLA: You're refusing to allow that to  
 11 happen?  
 12 MR. PIKE: I don't see how you can mark a set  
 13 of glasses as an Exhibit to a deposition.  
 14 The witness has already said that he did not  
 15 read the handwritten notes in the corner or the  
 16 corners of page 2 of the Complaint.  
 17 MR. SCAROLA: The witness is a liar. The  
 18 witness' testimony is totally incredible. The  
 19 witness made up a response and I want to be able to  
 20 demonstrate to the Court and jury that the witness  
 21 lied when he said that those glasses did not  
 22 correct his vision sufficiently to be able to read  
 23 the handwritten notes.  
 24 I want the glasses marked as an Exhibit.  
 25 If you refuse to mark them, I am placing you

1 notations on the Complaint?  
 2 MR. PIKE: Form. Mischaracterizes testimony.  
 3 THE WITNESS: My testimony was, I only read  
 4 the black letter and partially because I cannot see  
 5 thoroughly through these glasses, sir.  
 6 BY MR. SCAROLA:  
 7 Q. Is it your contention that those glasses did  
 8 not sufficiently correct your vision to be able to read  
 9 the handwritten notations on the papers that were handed  
 10 to you?  
 11 MR. PIKE: Form.  
 12 THE WITNESS: Again, we can play this game  
 13 back and forth. What I just said, and I think I  
 14 was very clear, that I did not read the notes. I  
 15 said --  
 16 BY MR. SCAROLA:  
 17 Q. What you said was, you couldn't read the  
 18 notes?  
 19 MR. PIKE: Allow the witness to finish.  
 20 THE WITNESS: Let me finish. And what I said  
 21 was, with these glasses it would be almost  
 22 impossible for me to read the notes on the page.  
 23 BY MR. SCAROLA:  
 24 Q. Yes, sir. So your contention is, that those  
 25 glasses do not adequately correct your vision to be able

1 on notice that they are relevant and material to  
 2 issues involved in this lawsuit and need to be  
 3 preserved.  
 4 MR. PIKE: All right. We'll mark the glasses.  
 5 We'll mark the glasses as an Exhibit. Okay? And I  
 6 will keep them here in my office.  
 7 MR. SCAROLA: Thank you.  
 8 MR. PIKE: That's fine.  
 9 VIDEOGRAPHER: This concludes today's  
 10 videotaped deposition of Jeffrey Epstein. The time  
 11 is 1:27.  
 12 (Exhibit number 1 was marked for  
 13 identification purposes and retained by Counsel for  
 14 Plaintiff.)  
 15 (Witness excused.)  
 16 (Deposition was concluded.)  
 17  
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CERTIFICATE OF OATH  
STATE OF FLORIDA  
COUNTY OF PALM BEACH

I, the undersigned authority, certify that  
JEFFREY EPSTEIN personally appeared before me and was  
duly sworn on the 17th day of March, 2010.

Dated this 26th day of March, 2010.

*Sandra Townsend*



Sandra W. Townsend, Court Reporter  
Notary Public - State of Florida  
My Commission Expires: 6/26/12  
My Commission No.: DD 793913  
Job #1358

DATE: March 26, 2010  
TO: JEFFREY EPSTEIN Job #1358  
c/o Michael Pike, Esquire  
303 Banyan Boulevard, Suite 400  
West Palm Beach, Florida 33401

IN RE: Epstein vs. Edwards, et al

CASE NO.: 502009CA040800XXXXMBAG

Please take notice that on Wednesday, the 17th  
of March, 2010, you gave your deposition in the  
above-referred matter. At that time, you did not waive  
signature. It is now necessary that you sign your  
deposition.

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

If you do not read and sign the deposition  
within a reasonable time, the original, which has  
already been forwarded to the ordering attorney, may be  
filed with the Clerk of the Court. If you wish to waive  
your signature, sign your name in the blank at the  
bottom of this letter and return it to us.

Very truly yours,

Sandra W. Townsend, FPR  
PROSE COURT REPORTING AGENCY  
250 Australian Avenue, Suite 1500  
West Palm Beach, Florida 33401

Phone: [REDACTED]

I do hereby waive my signature.

JEFFREY EPSTEIN

I do hereby waive my signature:

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

CERTIFICATE  
STATE OF FLORIDA  
COUNTY OF PALM BEACH

I, Sandra W. Townsend, Court Reporter and  
Notary Public in and for the State of Florida at Large,  
do hereby certify that the aforementioned witness was by  
me first duly sworn to testify the whole truth; that I  
was authorized to and did report said deposition in  
stentotype, and that the foregoing pages numbered --  
to -- inclusive, are a true and correct transcription of  
my shorthand notes of said deposition.

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

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

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

Dated this 26th day of March, 2010.

*Sandra Townsend*

Sandra W. Townsend, Court Reporter  
Job #1358

CERTIFICATE

THE STATE OF FLORIDA  
COUNTY OF PALM BEACH

I hereby certify that I have read the  
foregoing deposition by me given, and that the  
statements contained herein are true and correct to the  
best of my knowledge and belief, with the exception of  
any corrections or notations made on the errata sheet,  
if one was executed.

Dated this \_\_\_ day of \_\_\_\_\_,  
2010.

JEFFREY EPSTEIN  
Job #1358

1 ERRATA SHEET  
2 IN RE: EPSTEIN VS. EDWARDS, ET AL. CR: S. TOWNSEND  
3 DEPOSITION OF: JEFFREY EPSTEIN  
4 TAKEN: 3/17/10 JOB NO.: 1358

5 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE  
6 PAGE # LINE # CHANGE REASON

7	_____	_____	_____	_____
8	_____	_____	_____	_____
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17	_____	_____	_____	_____

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

19 Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

20 DATE: \_\_\_\_\_

21 SIGNATURE OF DEPONENT: \_\_\_\_\_  
22  
23  
24  
25