

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,
Plaintiff,

-vs-

VOLUME III OF III

JEFFREY EPSTEIN,
Defendant.

Related cases:

08-80232, 08-08380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF

JANE DOE NO. 3

Tuesday, April 6, 2010
2:07 - 5:07 p.m.

250 Australian Avenue
Suite 150
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
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1 APPEARANCES:
 2 On behalf of the Plaintiff:
 3 STUART S. MERMELSTEIN, ESQUIRE
 4 MERMELSTEIN & HOROWITZ, P.A.
 5 18205 Biscayne Boulevard
 6 Suite 2218
 7 Miami, Florida 33160
 8 Phone: [REDACTED]
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 10 On behalf of the Defendant:
 11 ROBERT D. CRITTON, JR., ESQUIRE
 12 BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
 13 303 Banyan Boulevard
 14 Suite 400
 15 West Palm Beach, Florida 33401
 16 Phone: [REDACTED]
 17 E-mail: [REDACTED]

18 ALSO PRESENT:
 19 Daniel Downey, Videographer
 20 Visual Evidence, Incorporated

CONTINUED PROCEEDINGS

1
 2
 3 THE VIDEOGRAPHER: This is the 6th day of
 4 April 2010. The time is approximately 2:07
 5 p.m. This is the videotaped deposition of
 6 Jane Doe No. 3 in the matter of Jane Doe versus
 7 Jeffrey Epstein.

8 This deposition is being held at 250 South
 9 Australian Avenue, West Palm Beach, Florida.
 10 My name is Daniel Downey. I'm the videographer
 11 representing Visual Evidence, Incorporated.

12 Will the attorneys please announce their
 13 appearances for the record?

14 MR. MERMELSTEIN: Stuart Mermelstein for
 15 the Plaintiff, Jane Doe No. 3.

16 MR. CRITTON: Bob Critton for
 17 Jeffrey Epstein.

18 Thereupon,

19 (JANE DOE NO. 3),

20 Having been first duly sworn or affirmed, was
 21 examined and testified as follows:

22 THE WITNESS: Yes.

23 DIRECT EXAMINATION

24 BY MR. CRITTON:

25 Q. Afternoon, Ms. No. 3.

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 25 TO DEFENDANT'S FIRST
 INTERROGATORIES

1 A. Hello.
 2 Q. Have you done anything to prepare for your
 3 deposition today; that is, have you looked at
 4 anything?

5 A. Yes.

6 Q. Tell me what you looked at.

7 A. My transcript.

8 Q. From the first session on February 19th?

9 A. Yes.

10 Q. Did it appear to be accurate to you; that
 11 is, the testimony that you gave was accurate?

12 A. Yes.

13 MR. MERMELSTEIN: Objection to form.

14 BY MR. CRITTON:

15 Q. Have you spoken with anyone other than
 16 your attorneys?

17 Same kind of rules. If I ask you a
 18 question, have you spoken with anyone, I am not --
 19 I'm not allowed to ask questions about discussions
 20 you've had with your attorneys, so I am excluding
 21 your attorneys and anyone who works in their office.
 22 Okay?

23 A. Okay.

24 Q. Have you discussed your deposition with
 25 anyone --

1 A. Yes.
 2 Q. -- since you gave it?
 3 With whom did you discuss your deposition?
 4 A. Jane Doe No. 4 and Jane Doe No. 7.
 5 Q. Have you seen Jane Doe No. 4 and/or Jane
 6 Doe No. 7 since February 19th of 2010 --
 7 A. Yes.
 8 Q. -- your deposition?
 9 On how many occasions? Now, I'm talking
 10 about seen them as distinct from spoken with them.
 11 A. One.
 12 Q. Where, where did you-all meet?
 13 A. I saw Jane Doe No. 7 only.
 14 Q. Saw Jane Doe No. 7. All right. And where
 15 did you see Jane Doe No. 7?
 16 A. My birthday party.
 17 Q. All right. Where, where was with your
 18 birthday party?
 19 A. At Noche.
 20 Q. That's the one that's up in The Gardens
 21 near Soverel [REDACTED]?
 22 A. Yes.
 23 Q. And Jane Doe No. 7 came to your party?
 24 A. Yes.
 25 Q. How many people did you invite to your

1 Q. Okay. And that's the extent of what she
 2 said about the deposition to you?
 3 A. She asked me questions, what could happen.
 4 Q. What do you mean?
 5 A. Like what, what could take place.
 6 Q. Oh, at her deposition?
 7 A. At a deposition.
 8 Q. Oh, when, when you, when you were talking
 9 about discussing the deposition, were you talking
 10 about your deposition with Jane Doe No. 7 or Jane
 11 Doe No. 7 was talking about the deposition she had
 12 given?
 13 A. In general.
 14 Q. Okay. So, she had, she just said she was
 15 nervous, but you don't know whether she had given
 16 the deposition and was nervous or was about to give
 17 the deposition?
 18 A. Correct.
 19 Q. All right. I understand now.
 20 Did you tell her what had happened at your
 21 deposition?
 22 A. No.
 23 Q. So, just so the jury knows, you had given
 24 a deposition and you didn't tell her one thing about
 25 the deposition that went on?

1 party?
 2 A. Ten.
 3 Q. Did anyone else come who was, who is a
 4 Plaintiff against Mr. Epstein?
 5 A. No.
 6 Q. Was anyone there other than Jane Doe No. 7
 7 who knew you were a Plaintiff?
 8 A. No.
 9 Q. And let's see. You were born on [REDACTED]
 10 [REDACTED], so it was about a little over a month ago.
 11 Had Jane Doe No. 7 given her deposition?
 12 A. I don't know.
 13 Q. Did she talk about her deposition at all?
 14 A. Yes.
 15 Q. Okay. And what did she say about her
 16 deposition?
 17 A. She was nervous.
 18 Q. Okay. She liked me?
 19 A. I, I don't know.
 20 MR. MERMELSTEIN: Objection to form.
 21 THE WITNESS: I don't know.
 22 BY MR. CRITTON:
 23 Q. Just that's all she said, she was nervous
 24 during the deposition?
 25 A. Yes.

1 MR. MERMELSTEIN: Objection to form.
 2 BY MR. CRITTON:
 3 Q. Is that what you're telling us?
 4 A. Exactly.
 5 Q. All right. How long, how long -- what
 6 time did your party start and what time did it end?
 7 A. We had dinner with my family first, and then
 8 we went to the club about 10:30, 11:00, somewhere around
 9 there.
 10 Q. And what time did the party shut down?
 11 A. I left at 2:30, 3:00, around there.
 12 Q. And did you go home?
 13 A. Yes.
 14 Q. Did you go home with anyone?
 15 A. With my girlfriends.
 16 Q. And who's that?
 17 A. [REDACTED] and [REDACTED]
 18 Q. What's [REDACTED]'s last name?
 19 A. [REDACTED]
 20 Q. And [REDACTED] is [REDACTED]?
 21 A. Yes.
 22 Q. And [REDACTED] is the one, I think
 23 you told me that you had told her that you had been
 24 at Epstein's house?
 25 A. Yes.

3. (Pages 398 to 401)

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1 Q. Does [REDACTED] know that you were at
 2 Mr. Epstein's house?
 3 A. No.
 4 Q. She doesn't. And she doesn't know you're
 5 a Plaintiff in this lawsuit?
 6 A. No.
 7 Q. Let me just stay with the other
 8 individuals, as Question 11 in your second set of
 9 interrogatories that was sent to you, you listed
 10 people who were your five closest friends, and you
 11 apparently only named four --
 12 A. Yes.
 13 Q. -- from '06 to 2010.
 14 One was [REDACTED], one was
 15 [REDACTED], a third is [REDACTED] (phonetic)
 16 [REDACTED]?
 17 A. [REDACTED].
 18 Q. Oh, [REDACTED]. You've known her since
 19 high school?
 20 A. Since before high school.
 21 Q. A long time?
 22 A. Yes.
 23 Q. And she doesn't -- does she know you're a
 24 Plaintiff in this lawsuit?
 25 A. No.

1 Doe No. 7 tell you what she's doing right now
 2 work-wise, for fun, or is she still in school?
 3 A. I know she's still in school.
 4 Q. And do you know what she's going to be,
 5 what she wants to be?
 6 A. I think business, something to do with
 7 business.
 8 Q. Did she tell you whether she was dating
 9 anyone?
 10 A. No.
 11 Q. How about -- and then you said -- have you
 12 spoken with Jane Doe No. 7 -- other than seeing her
 13 the one night over the last month and a half, have
 14 you continued to speak with her regularly?
 15 A. Prior to spring break for her college.
 16 Q. Which was when?
 17 A. Two weeks ago, somewhere.
 18 Q. Where was she headed to?
 19 A. Key West, Miami.
 20 Q. And you haven't talked to her since then?
 21 A. No.
 22 Q. Other than the one time you saw her and
 23 the other conversations that you had, have you
 24 discussed the cases at all?
 25 A. No.

1 Q. Does she know -- then, obviously, she
 2 wouldn't -- well, does she know that you ever went
 3 to Mr. Epstein's home --
 4 A. No.
 5 Q. -- on one occasion --
 6 A. No.
 7 Q. -- of the four occasions that you
 8 described?
 9 And [REDACTED], she's still one of your best
 10 friends?
 11 A. Yes.
 12 Q. Did you -- have you discussed with her the
 13 deposition you gave?
 14 A. No.
 15 Q. And does she -- she knows you went to
 16 Epstein's?
 17 A. Yes.
 18 Q. All right. Any guys at the party or just
 19 a girl party?
 20 A. There was guys at the club.
 21 Q. Understand that, but they came to your
 22 party?
 23 A. Yeah.
 24 Q. Separate and apart from having seen Jane
 25 Doe No. 7 -- well, let me ask you this: Did Jane

1 Q. Jane Doe No. 4, when did you speak with --
 2 Jane Doe No. 4, you haven't seen since
 3 February 19th, correct?
 4 A. Correct.
 5 Q. But you've spoken with her?
 6 A. Yes.
 7 Q. Because you speak with her regularly?
 8 A. No.
 9 Q. How many occasions have you spoken with
 10 her?
 11 A. Once.
 12 Q. Okay. And what was the occasion; did she
 13 call you or did you call her?
 14 A. I called her.
 15 Q. About?
 16 A. Birthday.
 17 Q. Just to say happy birthday?
 18 A. No, my birthday. So, I invited her to my
 19 party.
 20 Q. Oh, and she said what?
 21 A. Yeah.
 22 Q. But she didn't show?
 23 A. Correct.
 24 Q. Do you know why she didn't show?
 25 A. No.

1 Q. Did you ever talk to her about your
 2 deposition in any way?
 3 A. No.
 4 Q. And if I understood your testimony, the
 5 only thing you looked at is your transcript in
 6 preparation for today?
 7 A. Correct.
 8 Q. I see in your answers to interrogatories,
 9 which is consistent with your testimony, do you
 10 still work for the [REDACTED]?
 11 A. [REDACTED] yes.
 12 Q. [REDACTED]
 13 [REDACTED]?
 14 A. Yes.
 15 Q. And you describe your, yourself now as the
 16 lead hostess?
 17 A. Yes.
 18 Q. Okay. And I think you told us you were
 19 the maitre d'. Same thing?
 20 A. Yes.
 21 Q. And you're working 40 hours a week?
 22 A. No.
 23 Q. How many hours a week are you working now?
 24 A. It varies.
 25 Q. What's your, your average?

1 A. Thirty-five.
 2 Q. Are you considered a full-time employee?
 3 A. Yes.
 4 Q. And did you tell me -- you may have told
 5 me, are you entitled -- do you get benefits, health
 6 benefits?
 7 A. Yes.
 8 Q. And have you used your health benefits at
 9 all?
 10 A. Yes.
 11 Q. [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 Q. [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 Q. [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 [REDACTED]
 2 A. Can you re -- can you --
 3 Q. Sure.
 4 A. Something more simple.
 5 Q. [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]?
 9 A. Yes.
 10 Q. Okay. So putting aside those individuals,
 11 have you had a chance to look at your, at least the
 12 physicians, psychiatrists, psychologists, et cetera,
 13 that you've disclosed that you had seen.
 14 And my question to you is, is: Have there
 15 been any psychiatrists, psychologists, therapists
 16 that you've seen for solely issues relating to your
 17 visit to Mr. Epstein's home?
 18 A. [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED] -- well, let me
 22 strike that.
 23 [REDACTED], didn't disclose
 24 anything about Epstein, correct?
 25

1 A. I don't know.
 2 Q. All right. We'll, we'll get to [REDACTED]
 3 Is, is it your testimony that [REDACTED]
 4 [REDACTED]
 5 to your visit to Mr. Epstein's home?
 6 A. No.
 7 Q. Okay. In fact, [REDACTED]
 8 [REDACTED]
 9 [REDACTED] is that correct?
 10 A. Yes.
 11 Q. All right. If I separate -- and then let
 12 me just focus this, is you testified at your last
 13 deposition that you went to Mr. Epstein's house on
 14 four occasions, correct?
 15 A. Yes.
 16 Q. Okay. One time you went upstairs and gave
 17 Mr. Epstein a massage. And I'm not going to go
 18 through the details. We've covered that on the last
 19 deposition. But one time you went upstairs and gave
 20 him a massage and you described what occurred,
 21 correct?
 22 A. Yes.
 23 Q. The second time you took, I think, Jane
 24 Doe No. 2, but you stayed downstairs --
 25 A. Yes.

1 Q. -- correct?
 2 The third time you took J.L., but you
 3 stayed downstairs.
 4 A. Yes.
 5 Q. And the fourth time you went, you -- to
 6 Mr. Epstein's house, you took Jane Doe No. 4 at her
 7 request.
 8 A. Yes.
 9 Q. Okay. So if I refer to a one-time visit
 10 in my questioning to you, a one-time visit to
 11 Mr. Epstein's house that would be the one time that
 12 you went upstairs. Okay?
 13 A. Okay.
 14 Q. Because if I understand your testimony,
 15 you're not alleging that anything bad happened when
 16 you went back, or bad or inappropriate or traumatic
 17 at any time after the first visit, correct?
 18 A. No.
 19 Q. Okay. Well, what do you allege was
 20 traumatic about your taking Jane Doe No. 2 to
 21 Mr. Epstein's home on the second occasion? What
 22 happened to you that you consider traumatic?
 23 A. Many things.
 24 Q. Name one.
 25 A. Anxiety.

1 Q. Okay. And why, because you took a good
 2 friend to Mr. Epstein's house to suffer, as you've
 3 described it, the same emotional trauma,
 4 embarrassment, humiliation that you experienced on
 5 your first occasion?
 6 MR. MERMELSTEIN: Objection to form.
 7 THE WITNESS: You lost me there.
 8 BY MR. CRITTON:
 9 Q. Okay. Is, is your emotional -- well, let
 10 me strike that.
 11 You said on -- as a result of having been
 12 at Mr. Epstein's house on a second occasion when you
 13 didn't -- I think you didn't even see Mr. Epstein on
 14 the second occasion, did you?
 15 A. No.
 16 Q. Okay. So, but you say you had anxiety as
 17 a result of going there?
 18 A. Yes.
 19 Q. Okay. And what caused the anxiety?
 20 A. I don't know.
 21 Q. Anything else other than anxiety on the
 22 second occasion?
 23 A. Fearfulness.
 24 Q. Of what?
 25 A. Just scared of -- just I don't know, I don't

1 know how to describe it. Just scared. I was scared.
 2 Q. Okay. You don't know what you were scared
 3 of or why you were scared, but you were scared --
 4 A. I just got a feeling inside --
 5 Q. Let me, let me finish the question. If I
 6 understand your answer, you were scared; you were
 7 fear, fearful?
 8 A. Uh-huh. Yes.
 9 Q. But you don't know why on the second
 10 occasion?
 11 A. It's a combination of things.
 12 Q. What things?
 13 A. Not knowing the outcome, what's going on, just
 14 constant thoughts.
 15 Q. Of what? Constant thoughts of what?
 16 A. Many things; him, the house, the property,
 17 people, people that -- you know, staff.
 18 Q. But no one had ever threatened you before
 19 at the house, had they?
 20 A. What do you mean?
 21 Q. No one had threatened you; that is, either
 22 verbally or physically threatened you, had they?
 23 A. A threat could be all different sorts of
 24 things to me.
 25 Q. Well, had anyone physically assaulted you

1 at the house?
 2 A. Yes.
 3 Q. Okay. Who?
 4 A. Epstein.
 5 Q. So, you were physically assaulted on --
 6 and were you struck or touched?
 7 A. Touched.
 8 Q. You were not physically struck in any way?
 9 A. Not hit.
 10 MR. MERMELSTEIN: Objection to form.
 11 BY MR. CRITTON:
 12 Q. I'm sorry?
 13 A. Not hit.
 14 Q. So, you went back a -- to Mr. Epstein's
 15 house on the second time because you thought you
 16 might be physically assaulted?
 17 A. I didn't say that.
 18 Q. Okay. Well, if you thought you were going
 19 to be physically assaulted, or you were so scared as
 20 you've just described, or so fearful as you've just
 21 described, why then did you return to Mr. Epstein's
 22 house on the second occasion?
 23 A. Because I was young and I was vulnerable and I
 24 wasn't thinking.
 25 Q. Well, but you were anxious, scared,

1 fearful and thought that you might be physically
 2 assaulted, and you still went to Mr. Epstein's house
 3 on a second occasion, correct?
 4 MR. MERMELSTEIN: Objection to form. The
 5 first deposition covered in great length her
 6 thoughts and feelings in going back the second
 7 time. I'm not sure why we're revisiting all of
 8 that.
 9 MR. CRITTON: Well, this isn't a first or
 10 second deposition. It's a completion of the
 11 first, the first and only deposition and I'm
 12 allowed under the, the record --
 13 MR. MERMELSTEIN: I understand, but it's
 14 asked and answered many times.
 15 MR. CRITTON: Okay. Fine.
 16 BY MR. CRITTON:
 17 Q. You can go ahead and answer it.
 18 A. What's the question?
 19 MR. CRITTON: Cindy, would you read it
 20 back, please?
 21 (The requested portion of the record was
 22 read by the reporter.)
 23 THE WITNESS: Yes.
 24 BY MR. CRITTON:
 25 Q. And is it your testimony that you were

1 and I don't remember, did you say you went into the
 2 house or you did not go in the house?
 3 A. I didn't physically -- like, I was by the
 4 pool, beach area outside.
 5 Q. At that time did you feel anxious or
 6 scared?
 7 A. Yes.
 8 Q. Did you feel fearful or potentially
 9 physically threatened?
 10 A. Yes.
 11 Q. Okay. Why?
 12 A. Because we were there for a very long time.
 13 Q. Well, did you ever see anyone that day
 14 when you went to the house?
 15 A. No.
 16 Q. And when Jane Doe No. 4 came down, was
 17 there anything -- and I think, I think you've
 18 already said so, and I don't want to belabor the
 19 point, but she didn't say anything or -- to you that
 20 would have suggested that anything inappropriate or
 21 bad had occurred, did she?
 22 MR. MERMELSTEIN: Objection to form.
 23 THE WITNESS: No.
 24 BY MR. CRITTON:
 25 Q. Okay. Did her appearance appear other

1 traumatized by having been at Mr. Epstein's house on
 2 a second occasion even though you never saw him?
 3 A. Yes.
 4 Q. On the third occasion you went to
 5 Mr. Epstein's house, were you, as well, traumatized?
 6 A. Yes.
 7 Q. Were you anxious, scared, fearful and felt
 8 physically threatened as well?
 9 A. Anxious and scared, yeah.
 10 Q. But not -- but not fearful, nor did you --
 11 A. All of the above.
 12 Q. -- feel physically threatened?
 13 A. All of the above.
 14 Q. But, so my question then is --
 15 MR. MERMELSTEIN: Let him finish the
 16 question.
 17 BY MR. CRITTON:
 18 Q. So my question is: Why then did you go
 19 back on a third occasion?
 20 MR. MERMELSTEIN: Objection, asked and
 21 answered.
 22 THE WITNESS: I don't know.
 23 BY MR. CRITTON:
 24 Q. On the fourth occasion that you took Jane
 25 Doe No. 4, or you drove Jane Doe No. 4, did you --

1 than normal to you? Let me rephrase that question.
 2 Did -- from your observations, did
 3 everything seem to be okay with her?
 4 MR. MERMELSTEIN: Objection to form.
 5 THE WITNESS: I guess.
 6 BY MR. CRITTON:
 7 Q. And that was the last time you went to
 8 Mr. Epstein's house, correct?
 9 A. Yes.
 10 Q. Why didn't you ever go again?
 11 A. I don't know.
 12 Q. Did anyone ever ask you to go again?
 13 A. I don't remember.
 14 Q. Pardon?
 15 A. I don't remember.
 16 Q. Have you had an occasion to speak with
 17 or Jane Doe No. 2 since your last deposition?
 18 A. Yes.
 19 Q. With whom did you speak?
 20 A. [REDACTED]
 21 Q. And when did you see her?
 22 A. I never saw her.
 23 Q. All right. You spoke with her, and you
 24 did not see her, correct?
 25 A. Correct.

1 Q. On how many occasions have you spoken with
 2 her since --
 3 A. One.
 4 Q. -- February 19th, 2010, which was the
 5 start of your deposition?
 6 A. One.
 7 Q. Did she call you or did you call her?
 8 A. She called me.
 9 Q. Subject of the conversation?
 10 A. That she heard I had settled.
 11 Q. Did she tell you who she heard that from?
 12 A. No.
 13 Q. And how did she know you were even a
 14 Plaintiff?
 15 A. Good question.
 16 Q. Did you ask her?
 17 A. I asked. I go: Where did you hear this from?
 18 She goes: Oh, I was contacted by someone.
 19 Q. Did, did you ask her whether she was a
 20 Plaintiff in the case?
 21 A. No.
 22 Q. Okay. Do you know whether she is?
 23 A. No.
 24 Q. She has a -- and she didn't indicate one
 25 way or the other whether she was a Plaintiff?

1 A. January.
 2 Q. Did she ever mention to you ever about
 3 being a Plaintiff, you being a Plaintiff in a
 4 lawsuit against Mr. Epstein?
 5 A. She asked me.
 6 Q. And you told her?
 7 A. No.
 8 Q. Okay. So, why would she -- and again,
 9 when she said out of the blue, she called you after
 10 your first deposition, the start of your deposition
 11 and said, I heard you settled. And did you
 12 specifically ask her, and say where did you ever
 13 hear I was even a Plaintiff or I had even filed a
 14 suit against Mr. Epstein?
 15 MR. MERMELSTEIN: Objection, form.
 16 Assumes facts. You don't have to file a suit
 17 in order to settle.
 18 THE WITNESS: She -- what I just said to
 19 you prior, she heard that I had settled. And I
 20 go, no, I don't know what you're talking about.
 21 BY MR. CRITTON:
 22 Q. And then she changed the topic?
 23 A. No. She kept asking, she's like, you don't
 24 have a lawsuit? No.
 25 Q. So she pushed the envelope; she pushed you

1 A. Correct.
 2 Q. So, she calls you out of the blue. When
 3 was the last time you had heard from her?
 4 A. Prior -- around her birthday which is in
 5 February.
 6 Q. Okay. So just before your deposition?
 7 A. I don't know exactly when her birthday is.
 8 Q. But sometime around her birthday you had
 9 spoken with her?
 10 A. Yes.
 11 Q. Topic?
 12 A. Going to Tree's Wings.
 13 Q. I'm sorry?
 14 A. Going to Tree's Wings.
 15 Q. Which is what?
 16 A. A bar/restaurant.
 17 Q. She wanted you to come?
 18 A. Uh-huh.
 19 Q. Yes?
 20 A. Yes. Sorry.
 21 Q. And did you go?
 22 A. No.
 23 Q. All right. When's the last time you
 24 actually saw her physically or in person? This is
 25

1 to find out whether you had a lawsuit against
 2 Mr. Epstein?
 3 A. Yeah.
 4 Q. And you kept telling her no?
 5 A. Correct.
 6 Q. Anybody else call you since your -- since
 7 the start of your last deposition, or the start of
 8 your deposition about you being a Plaintiff in a
 9 lawsuit?
 10 A. No.
 11 Q. Do you know [REDACTED] ?
 12 A. Yes.
 13 Q. How do you know [REDACTED] ?
 14 A. School.
 15 Q. Friends with her?
 16 A. No.
 17 Q. And why not? You're saying that
 18 emphatically. Is there a reason that you're not
 19 friends with her?
 20 A. I never heard good things about her.
 21 Q. From whom?
 22 A. People.
 23 Q. Who do you think she's friends with?
 24 A. She went to [REDACTED], I think. She didn't
 25 go to my school. I think she was hanging out with [REDACTED]

1 and Jane Doe No. 7 at one point.
 2 Q. Okay. Was she ever friends with Jane Doe
 3 No. 4?
 4 A. I don't know.
 5 Q. And who told you anything bad about her?
 6 A. Just rumors.
 7 Q. Okay. And what are the rumors?
 8 A. I don't know. It was high school.
 9 Q. So anybody can get a bad reputation in
 10 high school?
 11 A. Yeah.
 12 Q. Whether it's true or not, you have no
 13 idea?
 14 A. Correct.
 15 Q. All right. And did you say you had
 16 actually met her?
 17 A. Yeah.
 18 Q. But you're not friends; you're just
 19 acquaintances?
 20 A. Not even that.
 21 Q. You just know who she is; she knows who
 22 you are?
 23 A. Yes.
 24 Q. You have an active Facebook?
 25 A. Yes.

1 you used it at all?
 2 A. I went on there one time.
 3 Q. Okay. Did you put any information -- did
 4 you have to set up a profile?
 5 A. That was already done.
 6 Q. She had already done that for you?
 7 A. Yes.
 8 Q. And what, do you go on and was your
 9 picture on as well?
 10 A. No.
 11 Q. It was just some background information on
 12 you?
 13 A. Yes.
 14 Q. All right. Did you ever search the site
 15 at all, go on anyone else's site?
 16 A. Yes.
 17 Q. Did you see anybody you liked?
 18 A. No.
 19 Q. Computers, you have your own computer?
 20 A. Yes.
 21 Q. Laptop?
 22 A. Yes.
 23 Q. What kind?
 24 A. Dell.
 25 Q. How long have you had it?

1 Q. And you used to have MySpace, but that's
 2 been canceled?
 3 A. Yes.
 4 Q. The question was asked whether you're a
 5 number of any web site, dating web sites, and you
 6 listed a friend registered yourself for
 7 wealhythemen.com.
 8 A. Yes.
 9 Q. Which of your good friends did that to
 10 you, for you?
 11 A. I think it was [REDACTED]
 12 Q. [REDACTED]?
 13 A. Yeah.
 14 Q. Okay. How did you find out that she had
 15 done that?
 16 A. She told me.
 17 Q. And what did you say?
 18 A. Why would you do that?
 19 Q. And she said?
 20 A. Because you just separated from [REDACTED]
 21 Q. But you've never used the site?
 22 A. No.
 23 Q. Never?
 24 A. Not -- no. Not like that, no.
 25 Q. Well, excuse me: Never is never. Have

1 A. Since Christmas.
 2 Q. And did you down -- what did you have
 3 before that?
 4 A. The Toshiba.
 5 Q. Did you download -- and how long had you
 6 had the Toshiba?
 7 A. Like my 19th birthday or 20th birthday.
 8 Q. And before that, another laptop?
 9 A. No, home, regular desktop.
 10 Q. When you got the Toshiba, that was a
 11 laptop?
 12 A. Yes.
 13 Q. Did you download the information that's on
 14 your home computer onto that that was applicable to
 15 you?
 16 A. No.
 17 Q. Did your Toshiba, when you went from
 18 Toshiba to Dell, did you download the information
 19 from the Toshiba to the Dell?
 20 A. No.
 21 Q. You started from scratch again?
 22 A. Yes.
 23 Q. And you run your My -- I'm sorry, your
 24 Facebook from your Dell computer laptop?
 25 A. Yes.

1 Q. Are you active on it?
 2 A. On Facebook?
 3 Q. Yes, ma'am.
 4 A. Yes.
 5 Q. Do you know [REDACTED]?
 6 A. Who?
 7 Q. A lady by the name of [REDACTED].
 8 A. No.
 9 Q. Do you know a person by the name of Jane
 10 Doe No. II?
 11 A. Who?
 12 Q. Jane Doe No. II, Jane Doe No. II.
 13 A. No.
 14 MR. CRITTON: What's the next exhibit, No.
 15 4?
 16 THE COURT REPORTER: Yes.
 17 (Defendant's Exhibit No. 4 was marked for
 18 identification.)
 19 BY MR. CRITTON:
 20 Q. Let me show you Exhibit 4, if you want it.
 21 These are your Amended Supplemental Answers to
 22 Interrogatories. These, these were sent on
 23 February 17th, 2010, just prior to your deposition.
 24 I don't see that you signed these or
 25 executed these. So my question to you is, in

1 THE WITNESS: Okay.
 2 MR. MERMELSTEIN: So, I guess there's --
 3 this, this is before this.
 4 BY MR. CRITTON:
 5 Q. There's Jane Doe's 3's Supplemental
 6 Answers to Interrogatories which are dated November
 7 13th, 2009.
 8 A. Yes.
 9 Q. Do you recognize --
 10 A. Yes.
 11 Q. -- your answers to those interrogatories?
 12 A. Yes.
 13 Q. If you look at the very last page, you
 14 swore to the truth of the -- that is, the
 15 interrogatories were true and accurate on
 16 November 6th of 2009. Do you see that?
 17 A. Yes.
 18 Q. And then you filed supplemental, these
 19 supplemental answers, Exhibit 4, or your attorney
 20 sent them out on November 17th.
 21 A. Mine says February.
 22 Q. Let me see what you've got.
 23 A. I have this one.
 24 Q. Oops I'm sorry. I was looking -- no. Oh,
 25 I've got two. Your last page is February 17th,

1 response to questions -- well, first of all, in
 2 response to -- start again.
 3 Do you recognize Exhibit 4 --
 4 A. Yes.
 5 Q. -- as being your answers to
 6 interrogatories?
 7 A. Yes.
 8 Q. And the information that's provided in
 9 response to Questions 18, 19, 20, and 21, was that
 10 true and accurate?
 11 MR. MERMELSTEIN: Let me object to form.
 12 Let me ask: Have you read this?
 13 THE WITNESS: Yeah. Give me a minute.
 14 BY MR. CRITTON:
 15 Q. Next one is Exhibit 5, which are your
 16 supplemental answers.
 17 MR. CRITTON: I will show those to you
 18 first.
 19 (Defendant's Exhibit No. 5 was marked for
 20 identification.)
 21 MR. CRITTON: Five are the supplemental
 22 answers to interrogatories.
 23 THE WITNESS: Are these the same?
 24 MR. MERMELSTEIN: Amended supplemental and
 25 then the supplemental.

1 2010?
 2 A. On this one, on Exhibit 4.
 3 MR. MERMELSTEIN: Well, that's not the
 4 certificate of service. That's the signature
 5 on the attorney signature line.
 6 MR. CRITTON: Okay. Well, look at your
 7 certificate of service, and maybe we should
 8 clarify this. They were sent, faxed to me on
 9 February 17th, 2010.
 10 MR. MERMELSTEIN: Right.
 11 MR. CRITTON: Okay. But you have a
 12 certificate of service of November 17th, 2009.
 13 I'm going to assume that's incorrect.
 14 MR. MERMELSTEIN: Yeah, particularly since
 15 the fax legend on top --
 16 MR. CRITTON: That's what I'm saying.
 17 MR. MERMELSTEIN: -- shows it was 2/17.
 18 MR. CRITTON: Okay. So, the
 19 certificate --
 20 MR. MERMELSTEIN: That's --
 21 MR. CRITTON: -- is just inaccurate.
 22 MR. MERMELSTEIN: Right.
 23 BY MR. CRITTON:
 24 Q. And the most important thing is, is these
 25 appear to have been dated September -- I'm sorry,

1 February 17th, 2010. And those answers -- are those
 2 answers; that is the amended supplemental answers to
 3 interrogatories, true and correct?
 4 A. Yes.
 5 Q. All right. And it appears that at least
 6 Question 18 says, List separately the names, address
 7 and phone numbers of all males including
 8 Mr. Epstein -- excluding Mr. Epstein, with whom
 9 you've had sexual activity since age ten by year.
 10 Describe the activity, and I'm paraphrasing now, the
 11 date and whether you received money or
 12 consideration.
 13 On your original answers; that is, Exhibit
 14 5, you listed [REDACTED], correct?
 15 A. Yes.
 16 Q. Okay. On the three months, four months
 17 later, three months later you listed [REDACTED] --
 18 A. Yes.
 19 Q. -- correct? [REDACTED]
 20 A. Because I didn't know exactly what the
 21 question was in detail of.
 22 Q. Okay. Do you remember getting the
 23 definitions with it? We sent definitions so that
 24 you could understand exactly what the nature of the
 25 sexual activity was.

1 A. Yes.
 2 Q. You list -- in 2003 you list [REDACTED], last
 3 name unknown, correct?
 4 A. Yes.
 5 Q. And [REDACTED]
 6 A. Yes.
 7 Q. [REDACTED]
 8 correct?
 9 A. Yes.
 10 Q. Which of these individuals was the first
 11 person that you had sexual intercourse with?
 12 A. The very first person?
 13 Q. Correct.
 14 A. [REDACTED]. I don't know if you're
 15 looking at the right one.
 16 Q. All right. Well, I may have left his name
 17 off. So [REDACTED] would have been the first
 18 person that you had sexual intercourse with?
 19 A. Yes.
 20 Q. Okay. When was that in '03; that is, the
 21 beginning of '03, mid '03?
 22 A. Summer.
 23 Q. Okay. And was there any oral sex involved
 24 with Mr. [REDACTED] and yourself --
 25 A. No.

1 MR. MERMELSTEIN: Objection to form.
 2 THE WITNESS: Do I remember a definition?
 3 BY MR. CRITTON:
 4 Q. Right. Do you remember receiving
 5 definitions along with it?
 6 A. I don't remember.
 7 Q. All right. Is it your testimony that
 8 the -- Exhibit 4 is the correct information --
 9 A. Yes.
 10 Q. -- or the more correct information?
 11 A. Yes.
 12 Q. All right. Let's stay then with
 13 Exhibit 4. The [REDACTED]
 14 That's your husband?
 15 A. Yes.
 16 Q. Any -- since the last deposition, or since
 17 February 19th of 2010, any further chance of
 18 reconciliation, or are you still going to move ahead
 19 with the divorce?
 20 A. I don't know.
 21 Q. Okay. Then you talk about, and it appears
 22 at least, your first sexual experiences were in the
 23 year 2003, correct?
 24 A. Yes.
 25 Q. All right. And you list [REDACTED].

1 Q. Or strictly sexual intercourse? On how
 2 many occasions?
 3 A. One.
 4 Q. Is he someone you dated, or was this just
 5 an event?
 6 A. No. I never was taken out on a proper date.
 7 Q. And where did it occur?
 8 A. His house.
 9 Q. Voluntarily, consensual?
 10 A. Yes.
 11 Q. The next person after Mr. [REDACTED] was
 12 whom?
 13 A. [REDACTED].
 14 Q. Someone in school, school friend?
 15 A. Yes.
 16 Q. Was [REDACTED] a school friend?
 17 A. No, he went to a different school.
 18 Q. How old was he? You -- let's see, in
 19 2003, the Summer of 2003; you would have been [REDACTED]?
 20 A. I'm not good with math.
 21 Q. Well, [REDACTED] --
 22 A. So...
 23 Q. -- [REDACTED]
 24 A. Okay.
 25 Q. All right. And how fast -- how soon after

1 [redacted] did you have your relation, sexual
 2 intercourse with him?
 3 A. I don't know.
 4 Q. A month later, a week later?
 5 A. I, I don't know.
 6 Q. Do you remember where it occurred?
 7 A. His house.
 8 Q. Okay. Voluntarily, consensual?
 9 A. Yes.
 10 Q. All right. You understood you had a
 11 choice either to have sex with him or not under the
 12 circumstances?
 13 A. Yes.
 14 Q. Strictly sexual intercourse, no oral sex?
 15 A. No, there was oral.
 16 Q. Both ways?
 17 A. Yes.
 18 Q. All right. Third person in '03?
 19 A. [redacted].
 20 Q. And did you have sexual, sexual
 21 intercourse with [redacted] ?
 22 A. No.
 23 Q. And you say -- you listed it as digital
 24 penetration.
 25 A. Uh-huh.

1 A. [redacted]
 2 Q. [redacted] ?
 3 [redacted]
 4 A. I, I don't know.
 5 Q. Had you for, for males before, had you
 6 ever taken any or all or part of your clothes off
 7 for a male before on a date? Not necessarily, it
 8 doesn't have to be a date, but when you were with a
 9 guy.
 10 A. Have I ever taken my clothes off?
 11 Q. No. Back in -- prior to [redacted],
 12 had you ever been with a guy and you had taken all
 13 or a portion of your clothes off?
 14 A. No.
 15 Q. Had you taken any or all or a portion of
 16 your clothes off prior to [redacted] ?
 17 A. No.
 18 Q. Okay. [redacted] was the first
 19 person. Did you remove any of your clothes for
 20 [redacted] ?
 21 A. Just my bottom.
 22 Q. Okay. And he digitally penetrated you
 23 with his hand?
 24 A. Yes.
 25 Q. Or with his fingers?

1 Q. Meaning he was using his hand?
 2 A. Yes.
 3 Q. And that was the extent. Was there any
 4 petting involved; that is, were you, were you, both
 5 of you undressed and then he digitally penetrated
 6 you?
 7 A. No.
 8 Q. Okay. Voluntary, consensual?
 9 A. Yes.
 10 Q. Who's next?
 11 A. [redacted] and [redacted], [redacted] were
 12 prior to everyone I just named. I'm going to correct
 13 that.
 14 Q. With [redacted], he would be, would
 15 have been the first?
 16 A. Yes.
 17 Q. And did he take your -- this you describe
 18 as digital penetration?
 19 A. Yeah.
 20 Q. Did he remove your underwear?
 21 A. Not fully.
 22 Q. He just reached within?
 23 A. Yes.
 24 Q. All right. How old were you? This was in
 25 2003? This was before the Summer of '03 then?

1 A. Yes.
 2 Q. Voluntary, consensual?
 3 A. Yes.
 4 Q. And with regard to every -- well, I'll
 5 come back to that. Did you touch him?
 6 A. Yes.
 7 Q. Okay. Did you touch his penis?
 8 A. Yes.
 9 Q. Did you masturbate him?
 10 A. No.
 11 Q. Okay. Did he ever climax?
 12 A. Yes.
 13 Q. By himself?
 14 A. Yes.
 15 Q. All right. Did he do it himself in front
 16 of you?
 17 A. Yes.
 18 Q. All right. And did you?
 19 A. No.
 20 Q. When I say you, did you climax?
 21 A. No.
 22 Q. All right. With Joseph, [redacted] ?
 23 A. Yes.
 24 Q. Okay. He also -- he would have been
 25 shortly after [redacted] ?

1 A. Yes.
 2 Q. Okay. And with [redacted] where did that
 3 occur?
 4 A. His house.
 5 Q. Joseph -- [redacted], where did that
 6 occur?
 7 A. My house.
 8 Q. Your room?
 9 A. Yes.
 10 Q. Any clothes come off?
 11 A. No.
 12 Q. He reached underneath?
 13 A. Yes.
 14 Q. All right. Did you touch him?
 15 A. Yes.
 16 Q. Okay. And did you masturbate him?
 17 A. No.
 18 Q. Okay. Did he climax?
 19 A. I don't know.
 20 Q. Did you?
 21 A. No.
 22 Q. The third person, now we're back to
 23 [redacted]?
 24 A. Yes.
 25 Q. Okay. And that was at his house?

1 house when this occurred?
 2 A. Where were --
 3 Q. When --
 4 A. That's broad.
 5 Q. When he digitally penetrated you, where
 6 were you located?
 7 A. In a house, in --
 8 Q. I understand that.
 9 A. Yes.
 10 Q. Did you go in a bedroom or something like
 11 that?
 12 A. Yeah, in a room.
 13 Q. All right. And did you touch him?
 14 A. Yes.
 15 Q. Okay. Clothes come off?
 16 A. Yes.
 17 Q. Yours, his, both?
 18 A. Mine.
 19 Q. Any of his clothes come off?
 20 A. No. I don't think so.
 21 Q. Okay. You touched him. Did he climax?
 22 A. No.
 23 Q. Did you?
 24 A. No.
 25 Q. Okay. The next -- of the first five

1 A. Yes.
 2 Q. His room?
 3 A. Yes.
 4 Q. And everyone -- oh, then the next person
 5 after that would have been [redacted]?
 6 A. Yes.
 7 Q. Third person also still in '03 -- I'm
 8 sorry. Now, the fifth experience would have been
 9 with [redacted]?
 10 A. Yes.
 11 Q. All right. And [redacted] was again
 12 digital penetration?
 13 A. Yes.
 14 Q. His house? Your house? Nobody's house?
 15 A. Friend's house.
 16 Q. Which friend?
 17 A. [redacted]
 18 Q. All right. And were there other people
 19 there at the time?
 20 A. Yes.
 21 Q. All right. And were other people involved
 22 in different, as well, in having relationships with
 23 guys and girls?
 24 A. Not that I'm aware of.
 25 Q. Where, where were you-all at the other

1 people we talked about, in all instances it was
 2 voluntary, consensual, you knew what was going on?
 3 A. Yes.
 4 Q. All right. Who is next then after
 5 [redacted]?
 6 A. [redacted].
 7 Q. [redacted]?
 8 A. No. It was [redacted].
 9 Q. How many -- with [redacted], on how many
 10 occasions did you have contact with him, physical
 11 contact with him; just the once?
 12 A. We were dating.
 13 Q. So it was -- was it more than once you had
 14 digital penetration?
 15 A. Yes.
 16 Q. Okay. Was it more than once that you
 17 touched him?
 18 A. Yes.
 19 Q. Okay. And from -- as time went on, was it
 20 multiple occasions that you would have touched each
 21 other, had physical contact?
 22 A. Yes.
 23 Q. Okay. And did you ever masturbate him or
 24 did you ever see him masturbate?
 25 A. I saw him masturbate, yes.

1 Q. Okay. Next person you say is [REDACTED]
 2 right?
 3 A. Yes.
 4 Q. And with him, is he someone you dated for
 5 a period of time, or was this a one-time event?
 6 A. Excuse me. No, I dated him.
 7 Q. How long?
 8 A. Three, four months.
 9 Q. Okay. And on how many occasions did you
 10 have sexual intercourse with him?
 11 A. I don't know.
 12 Q. More than ten times?
 13 A. I don't -- I don't know. I didn't count.
 14 Q. And I'm not, I don't mean it necessarily
 15 exact, but multiple times?
 16 A. Multiple times, yes.
 17 Q. Voluntary, consensual, you knew what was
 18 going on? You consented and he consented?
 19 A. Yes.
 20 Q. Are all of the males that we've talked
 21 about through [REDACTED] at this time, are these
 22 individuals who are your same age or within a year
 23 or two?
 24 A. Yes.
 25 Q. And [REDACTED] if I remember, [REDACTED] is the

1 had no relation, physical relationship with anyone
 2 since [REDACTED] -- since you separated from [REDACTED]?
 3 A. Correct.
 4 Q. So, [REDACTED], you dated for three or
 5 four months, you had multiple relations with him in
 6 which I assume removing of clothes, having sexual
 7 intercourse on multiple occasions, correct?
 8 A. Yes.
 9 Q. All right. Who is after [REDACTED]?
 10 A. [REDACTED]
 11 Q. Is he someone you dated? Was this a
 12 one-time event? Again, you described it as 2003,
 13 digital penetration.
 14 A. We were friends.
 15 Q. More than once?
 16 A. No.
 17 Q. Okay. The one time he digitally
 18 penetrated you, did you touch him?
 19 A. Yes.
 20 Q. Okay. Did you masturbate him?
 21 A. No.
 22 Q. Okay. Did he climax?
 23 A. No.
 24 Q. You just touched --
 25 A. Yes.

1 person -- the only person with whom you had a sexual
 2 relationship post or after -- since you separated
 3 from [REDACTED] (sic)?
 4 A. Who's [REDACTED]
 5 Q. [REDACTED] All
 6 right.
 7 A. [REDACTED]
 8 Q. Is that right?
 9 A. Uh-huh.
 10 Q. I just didn't catch the front for
 11 Mr. [REDACTED]
 12 A. Yeah.
 13 Q. Let me start again.
 14 My recollection was, is your -- when we
 15 started your deposition, you said that you had had
 16 sexual relations with one person since you left
 17 [REDACTED] (sic), and that was [REDACTED]?
 18 A. Yes.
 19 Q. Okay. Now, are you still seeing him now?
 20 A. [REDACTED]?
 21 Q. Yes.
 22 A. No.
 23 Q. Are you seeing anyone else?
 24 A. No.
 25 Q. And I assume then, other than [REDACTED], you've

1 Q. -- one another? All right.
 2 Next would be whom, [REDACTED]?
 3 A. No. No. Yes.
 4 Q. No, yes? Yes?
 5 A. Yes, yes, sorry.
 6 Q. Because he's the only other one in '03 at
 7 least that you've listed.
 8 Is there anyone else that you've forgotten
 9 that you should have put in the '03 period?
 10 A. No.
 11 Q. [REDACTED], on how many occasions did you
 12 two get together physically?
 13 A. Three.
 14 Q. Clothes come off?
 15 A. No.
 16 Q. Just he digitally penetrated you on
 17 approximately three occasions?
 18 A. Yes.
 19 Q. And did you touch him?
 20 A. Yes.
 21 Q. And did you see -- did you masturbate him?
 22 A. No.
 23 Q. Did he climax?
 24 A. No.
 25 Q. Where did [REDACTED]'s -- where did you get

1 together with [REDACTED]?

2 A. His house, a friend's house, that's it.

3 Q. Any of the -- any of the first eight

4 people we've covered ever occur at Jane Doe No. 4's

5 house?

6 A. No.

7 Q. At Jane Doe No. 7's house?

8 A. No.

9 Q. Have you ever had any type of sexual

10 activity occur, intercourse, oral sex, digital

11 penetration when you've been in Jane Doe No. 4's

12 house?

13 A. I don't remember.

14 Q. How about at Jane Doe No. 7's house?

15 A. Yes.

16 Q. Okay. And who, with whom at Jane Doe No.

17 7's house?

18 A. This guy J.P.

19 Q. Is he on this list?

20 A. No.

21 Q. Why not?

22 A. Because I, I don't know. Because we made out.

23 Q. All right. But you had no digital

24 penetration, no touching?

25 A. Nothing, just make out.

1 have been after [REDACTED]?

2 A. Yes.

3 Q. Okay. And [REDACTED], if I recall, he was

4 someone that you dated on and off for a long time?

5 A. Yes.

6 Q. Do you ever see him anymore?

7 A. No.

8 Q. Is he still around?

9 A. Yes.

10 Q. Did he ever get married?

11 A. I don't -- I don't know.

12 Q. You just don't -- have no connection with

13 him at all?

14 A. I don't ask about him.

15 Q. Okay. [REDACTED] is someone that you had

16 sexual intercourse. I assume if you dated over a

17 four or five -- three-year time period, you would

18 have had sexual intercourse with him, oral sex on

19 multiple occasions. Fair statement?

20 A. Yes.

21 Q. And, again, everyone now through [REDACTED],

22 voluntary, knowing, intelligent, you understood, you

23 agreed, your partner agreed, correct?

24 A. Yes.

25 Q. In any of these relationships through

1 Q. All right. Okay. After [REDACTED], who's

2 next?

3 A. [REDACTED] and then [REDACTED]

4 [REDACTED].

5 Q. Okay, now, you say he's next, but you have

6 [REDACTED] for 2004 with Mr. [REDACTED] you have for

7 2005. Should Mr. [REDACTED] be in 2004?

8 A. No. No, that one's correct. It was [REDACTED].

9 That would be next.

10 Q. It looks like [REDACTED] was the only one that

11 you had -- did you have a long-term relationship

12 with [REDACTED]?

13 A. I did. Not, not long term, no.

14 Q. What are we talking about?

15 A. Three months.

16 Q. And you had sexual intercourse with him on

17 multiple occasions?

18 A. Once.

19 Q. And that was the only sexual, no oral sex,

20 no nothing, just one time sexual intercourse in

21 three months?

22 A. Yes.

23 Q. And he was the only person during 2004?

24 A. [REDACTED].

25 Q. Okay. Now, I see [REDACTED]. So, [REDACTED] would

1 [REDACTED] any type of physical or verbal abuse with

2 these individuals?

3 A. Prior or with him?

4 Q. While you were dating these people or with

5 these people.

6 A. Just [REDACTED].

7 Q. Was he abusive, physically abusive to you?

8 A. That's such a broad statement to me.

9 Q. Okay. Did he ever strike you?

10 A. No.

11 Q. Okay. Was -- did you consider him

12 physically abusive to you?

13 A. Yes.

14 Q. In what way?

15 A. He would grab me.

16 Q. Where?

17 A. My arms.

18 Q. Leave bruises?

19 A. No.

20 Q. Why would he grab you on your arms?

21 A. We would be fighting, and I wouldn't get out

22 of the way.

23 Q. Happen on many occasions?

24 A. A few.

25 Q. More or less than five?

1 A. Less.
 2 Q. [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 Q. I remember you told us that. Was he
 8 [REDACTED], or was he
 9 just angry with you?
 10 A. I think he was angry.
 11 Q. What had you done from his perspective;
 12 what did he say?
 13 A. I don't know.
 14 Q. You -- were you-all living, at any time
 15 living together?
 16 A. No.
 17 Q. Did any of these individuals that are on
 18 this list, separate and apart from your husband,
 19 have you lived with any of them at their home or --
 20 A. No.
 21 Q. -- apartment? Okay. [REDACTED], so [REDACTED] you
 22 dated in 2004, 2005, and 2006. In 2004, now I
 23 remember you were dating [REDACTED] when [REDACTED] asked if
 24 you wanted to go give a massage to an older man over
 25

1 Q. Okay. Did you ever tell him you had taken
 2 anyone else to Mr. Epstein's home?
 3 A. Never.
 4 Q. Did [REDACTED] know that you [REDACTED]
 5 [REDACTED]
 6 A. I don't know.
 7 Q. Okay. Does anyone know you [REDACTED]
 8 [REDACTED] other than your parents and the
 9 [REDACTED] with?
 10 A. Yes.
 11 Q. Who?
 12 A. [REDACTED].
 13 Q. [REDACTED]?
 14 A. Yes.
 15 Q. Okay. Because you told her [REDACTED]
 16 [REDACTED]
 17 A. No, I told her.
 18 Q. But other than your parents -- do both of
 19 your parents know you [REDACTED]?
 20 A. Yes.
 21 Q. And other than mom and dad and
 22 [REDACTED], whom you've told, does anyone else
 23 know you [REDACTED]?
 24 A. Yes.
 25 Q. Who?

1 in Palm Beach, right?
 2 A. Yes.
 3 Q. And [REDACTED] the one that said no way under
 4 God's green earth, or something to that effect?
 5 A. Yes.
 6 Q. And then after you stopped dating [REDACTED]
 7 you then started that you -- [REDACTED] asked you again,
 8 and you went to Mr. Epstein's house, correct?
 9 A. Excuse me. Yes.
 10 Q. Did you ever -- and then, then after you
 11 went to Epstein's house, did you start dating [REDACTED]
 12 again? When I say, when you -- after you first went
 13 to Mr. Epstein's house, which you, I think you
 14 described sometime in June of 2004.
 15 A. Okay.
 16 Q. Okay. Did you go -- at some point after
 17 June of 2004 start dating [REDACTED] again?
 18 A. On and off.
 19 Q. Okay. So, when you say you dated him in
 20 2004 to 2006, you dated him on and off during that
 21 entire time period?
 22 A. Yes.
 23 Q. Did you ever tell [REDACTED] that you had gone
 24 to Mr. Epstein's home?
 25 A. Never.

1 A. [REDACTED].
 2 Q. Who is [REDACTED]?
 3 A. My cousin.
 4 Q. What's her last name?
 5 A. [REDACTED] (phonetic). I don't know...
 6 Q. She's your cousin, not mine.
 7 A. I know.
 8 Q. [REDACTED]
 9 A. Yeah.
 10 Q. Where does [REDACTED] live?
 11 A. Orlando.
 12 Q. Do you know what her number is?
 13 A. No.
 14 Q. And did you tell -- when did you tell her?
 15 A. Long, long, when I was little.
 16 Q. Close with her?
 17 A. I was.
 18 Q. Now you're just separated by distance?
 19 A. Yes.
 20 Q. Any reason, other reason you're not close?
 21 A. No.
 22 Q. After [REDACTED], [REDACTED]?
 23 A. Excuse me. [REDACTED]
 24 Q. Is he someone you dated?
 25 A. Yes.

1 Q. For a long period of time?
 2 A. No.
 3 Q. How long did you date him?
 4 A. Four months.
 5 Q. And multiple times you have had sexual
 6 intercourse, oral sex?
 7 A. Yes.
 8 Q. And the last, and the only other person on
 9 your list is [REDACTED] is that correct?
 10 A. Yes.
 11 Q. So, everyone -- there's ten people that
 12 you've listed that you had some type of sexual
 13 activity, whether it was sexual intercourse, oral
 14 sex, digital penetration or you touching a man's
 15 penis, that occurred prior to the time that you
 16 first went to Mr. Epstein's house, correct?
 17 A. That all of this, excuse me, all of this
 18 happened prior to going to his house?
 19 Q. Correct.
 20 A. Some.
 21 Q. Well, no, listen to me. Let me ask the
 22 question again.
 23 Everyone through [REDACTED], who was
 24 number ten, okay, which you listed as 2004, those
 25 are all individuals that you had a sexual activity

1 Q. Okay. And did you look at any of that
 2 information before you came in today?
 3 A. No.
 4 Q. Okay. Did you get that information --
 5 well, let me strike that.
 6 You now know that it was -- well, let
 7 me -- let me ask it this way: You knew that you got
 8 a Toyota sometime after or right around the time of
 9 [REDACTED]
 10 A. Yes.
 11 Q. -- or shortly thereafter?
 12 A. Yes.
 13 Q. Okay. And you knew that it was after you
 14 got that vehicle that you had gone to Mr. Epstein's
 15 house for the first occasion.
 16 A. Yes.
 17 Q. All right. And if so, if the, if the
 18 records reflect, it looks it appears that the title
 19 transferred on or about the end of [REDACTED],
 20 which would then put you in the June timeframe,
 21 which met with your recollection; is that correct?
 22 MR. MERMELSTEIN: I am just going to
 23 object. I think you're generally right, but I
 24 think the -- if you look at the data as to
 25 when, you know, you know, you do the

1 with before you ever went to Mr. Epstein's home,
 2 correct?
 3 A. Yes.
 4 Q. Okay. And in each of those instances, as
 5 you've described to us; that is, before you went to
 6 Mr. Epstein's home, you were in a position to make a
 7 decision both consensually, voluntarily,
 8 intelligently as to whether or not you were going to
 9 engage in any sexual activity with any of those
 10 males, true?
 11 A. Consensually, yes.
 12 Q. All right. At your last deposition you
 13 said, or at the start of your deposition you
 14 said that, you said you knew you were at
 15 Mr. Epstein's home in, I think you said June of 2004
 16 because your mother had just bought you a new, used
 17 [REDACTED] 2005 or 2006. Do you remember saying that?
 18 A. Yes.
 19 Q. Okay. And I was sent something, and I
 20 couldn't figure it out until today, but it reflects
 21 that your [REDACTED] was not a 2004. It was not a 2005
 22 or a 2006, but it was an older model.
 23 A. Yes.
 24 Q. Is that correct?
 25 A. Yes.

1 transaction, the deal, and you take the car and
 2 then the title documents are done later. So, I
 3 think there's a [REDACTED] date
 4 somewhere.
 5 BY MR. CRITTON:
 6 Q. Well, there's a, there's an earlier [REDACTED]
 7 date, and then there's a [REDACTED]
 8 Do you know when you actually took possession of
 9 that car?
 10 A. I don't know.
 11 Q. Sometime, would you agree with me that you
 12 couldn't have taken possession of it before you got
 13 title to it, or at least a transfer of title?
 14 A. I don't know.
 15 Q. Okay. So, you think you can get a car and
 16 start driving it before you ever buy it?
 17 MR. MERMELSTEIN: Objection to form.
 18 BY MR. CRITTON:
 19 Q. Doesn't make sense, does it?
 20 A. I'm not a dealership. I don't know how that
 21 works --
 22 Q. Okay. Would you --
 23 A. -- to be honest with you.
 24 Q. Your recollection is you went to
 25 Mr. Epstein's sometime in June of '04?

1 [REDACTED]
 2 A. Yes.
 3 Q. And [REDACTED] you were [REDACTED] costed and
 4 molested by [REDACTED] who touched your
 5 breasts, touched you in -- over your clothes on your
 6 breasts; and then he touched you in his -- in your
 7 vaginal area, true?
 8 MR. MERMELSTEIN: Objection to form.
 9 THE WITNESS: Over, yes.
 10 BY MR. CRITTON:
 11 Q. Right. Over your -- you had on pajamas, I
 12 think you described, or some type of night clothes.
 13 A. Nightwear, yes.
 14 Q. All right. And over those -- well, in
 15 fact, I should ask you: What did you have on? Did
 16 you have on pajamas? Did you have a nightshirt on?
 17 A. Pajamas.
 18 Q. All right. Which would be bottom pants
 19 with a top pants?
 20 A. I don't know exactly what I was wearing.
 21 Q. But something like that?
 22 A. Yeah.
 23 Q. All right. And [REDACTED] that is,
 24 [REDACTED] he touched you. He touched
 25 your breasts over your clothes. And I think you

1 you ever hear that?
 2 A. Yes.
 3 Q. Okay. And did she ever tell you that he
 4 had done that?
 5 A. Yes.
 6 Q. And [REDACTED] herself told you that?
 7 A. Yes.
 8 Q. Did she tell you that on or about that
 9 time or years later?
 10 A. I don't know when it took place.
 11 Q. Were you, were you -- I'm sorry, not
 12 necessarily when it took place, but did she tell you
 13 around that time when you were approximately [REDACTED]
 14 years old?
 15 A. Told me what?
 16 Q. That her brother had raped her.
 17 A. Yes.
 18 Q. And how did you react to that? Did you
 19 understand what rape was at that time?
 20 A. Yes.
 21 Q. Okay. And you understood then that her --
 22 did you understand that her brother had sexually --
 23 had sexual intercourse with her? Is that what you
 24 understood from her?
 25 A. Yes.

1 said you flinched, correct?
 2 A. Yes.
 3 Q. Okay. And then he, he then touched you
 4 down in your vaginal area over your clothes?
 5 A. Yes.
 6 Q. All right. And again you flinched or
 7 moved away from him?
 8 A. Yes.
 9 Q. All right. And either that day or the
 10 following day, someone -- well, let me strike that.
 11 Did you go back and tell your parents at all?
 12 A. No.
 13 Q. Did you tell anyone that day?
 14 A. No.
 15 Q. Okay. And do you recall how it happened
 16 that they started an investigation that ultimately
 17 led back to you?
 18 A. No.
 19 Q. [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

1 Q. And what, what was her reaction to that?
 2 I mean was she crying when she told you? Was she in
 3 shock?
 4 A. Yes.
 5 Q. How did you react to that?
 6 A. I was in shock.
 7 Q. And Ms. Doe No. 3, was that after the
 8 slumber party that you learned all that?
 9 A. Yes.
 10 Q. And would it be a correct statement that,
 11 as a result of what [REDACTED] did at the slumber
 12 party in which you learned from [REDACTED] that you
 13 found that a very traumatic experience?
 14 MR. MERMELSTEIN: Objection to form.
 15 THE WITNESS: What happened to her?
 16 BY MR. CRITTON:
 17 Q. What happened to you.
 18 A. I don't know.
 19 Q. Did you -- were you, when he touched you
 20 that night, were you in shock?
 21 MR. MERMELSTEIN: Objection to form.
 22 THE WITNESS: I, I don't know.
 23 BY MR. CRITTON:
 24 Q. Well, did you perceive -- were you shocked
 25 at what he had done? I'm not talking the medical

1 definition of shock. I'm talking about how you
 2 felt.
 3 A. Yes.
 4 Q. Did you -- were you confused?
 5 A. Yes.
 6 Q. Were you humiliated?
 7 A. I don't know.
 8 Q. Were you embarrassed?
 9 A. I don't know.
 10 Q. Okay. Did you have what you considered to
 11 be a severely, severe emotional reaction to what he
 12 had done?
 13 MR. MERMELSTEIN: Objection to form.
 14 THE WITNESS: I don't know.
 15 BY MR. CRITTON:
 16 Q. Maybe you did, maybe you didn't; you just
 17 don't recall?
 18 A. Correct.
 19 Q. When your mother found out about what had
 20 happened -- well, let me strike that.
 21 Did the police just show up at your door
 22 and say we would like to talk to your daughter about
 23 being over at [REDACTED]'s house?
 24 A. I don't know how. I don't know.
 25 Q. But you remember the police interviewing

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

1 you?
 2 A. Yes.
 3 Q. [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 Q. -- for any reason? Okay. [REDACTED], correct?
 8 [REDACTED]
 9 A. Yes.
 10 Q. I'm not trying to make the math hard, I
 11 think that -- I think that's accurate.
 12 Prior to that time, at least it looks from
 13 reading [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 Q. Okay. [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 A. No.
 2 Q. [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 A. I did not.
 12 Q. Did someone -- did you tell anybody about
 13 it or did someone find what you had done?
 14 A. Yes.
 15 Q. Who?
 16 A. My mom.
 17 Q. Did she come in when you were doing this?
 18 A. No.
 19 Q. [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 A. Summer.
 13 Q. When she saw it, what did she say?
 14 A. I don't know.
 15 Q. What did you tell her?
 16 A. The truth.
 17 Q. Which was what?
 18 A. [REDACTED]
 19 Q. [REDACTED]
 20 A. [REDACTED]
 21 Q. [REDACTED]
 22 A. [REDACTED]
 23 Q. [REDACTED]
 24 A. [REDACTED]
 25 Q. [REDACTED]

1 [REDACTED]?
 2 MR. MERMELSTEIN: Objection to form.
 3 THE WITNESS: [REDACTED]
 4 BY MR. CRITTON:
 5 Q. When people -- well, I can't generalize
 6 so -- so [REDACTED]
 7 [REDACTED]?
 8 A. The divorce.
 9 Q. Your parents?
 10 A. The cheating, yes.
 11 Q. Did you believe that you had played a role
 12 in the divorce taking place?
 13 A. I did believe that.
 14 MR. MERMELSTEIN: Objection.
 15 BY MR. CRITTON:
 16 Q. Because you had told your mom that your
 17 dad had been cheating?
 18 A. No.
 19 Q. What; what role did you believe that you
 20 had played in the divorce?
 21 A. Because I was a child. I, I don't know.
 22 Q. Did you tell me you had a sister? Is it
 23 [REDACTED]
 24 A. Yes.
 25

1 Q. Did [REDACTED]
 2 [REDACTED]
 3 A. I don't think so.
 4 Q. Does your father know? Did your mom tell
 5 your dad?
 6 A. Yes.
 7 Q. Okay. Were they separated at that time?
 8 A. Yes.
 9 Q. And I, again, saw some, [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 Do you remember that?
 18 A. Yes.
 19 Q. Okay. On how many -- and that was -- how
 20 old were you then? Is this around the same time or
 21 were you even younger?
 22 A. I don't know.
 23 Q. On how many times, on how many occasions
 24 did it occur when you were young, when your parents
 25 were still together before they got a divorce,

1 Ms. Doe No. 3, that the -- either the verbal or the
 2 physical violence was so great that you and your
 3 mother and your sister had to leave the house?
 4 A. Maybe like two times.
 5 Q. Okay. Those are indelibly etched on your
 6 brain?
 7 MR. MERMELSTEIN: Objection to form.
 8 THE WITNESS: I remember them.
 9 BY MR. CRITTON:
 10 Q. And I would guess for a small child, they
 11 were pretty traumatic events?
 12 MR. MERMELSTEIN: Objection to form.
 13 THE WITNESS: Scary.
 14 BY MR. CRITTON:
 15 Q. And were you fearful for yourself?
 16 A. No.
 17 Q. For your mom?
 18 A. Yes.
 19 Q. Were you -- did you find the whole events
 20 between your mother and father to be confusing?
 21 A. Yes.
 22 Q. Okay. And did you consider that those
 23 were emotionally taxing on you?
 24 A. Yes.
 25 Q. Did your mother take you to see any type

1 [REDACTED]
 2 [REDACTED] ?
 3 A. [REDACTED]
 4 Q. [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 Q. [REDACTED]
 9 A. [REDACTED]
 10 Q. [REDACTED]
 11 A. [REDACTED]
 12 Q. [REDACTED]
 13 A. [REDACTED]
 14 Q. [REDACTED]
 15 A. [REDACTED]
 16 Q. [REDACTED]
 17 [REDACTED]
 18 A. [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 A. I don't know. When I was older.
 22 Q. At that time were you dating anyone?
 23 A. I don't, I don't know.
 24 Q. Okay. [REDACTED]
 25 [REDACTED]

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 Q. [REDACTED]
 7 A. I-- I don't know.
 8 Q. You have no recollection as you sit here
 9 now?
 10 MR. MERMELSTEIN: Objection to form.
 11 THE WITNESS: [REDACTED]
 12 BY MR. CRITTON:
 13 Q. You say many things. What, what things
 14 were bothering you at that time?
 15 A. I, I don't know. I don't know.
 16 Q. Can you give me anything that was going
 17 on? Okay. You're 15 years old now because you had
 18 your learner's permit, so we had to have been in
 19 [REDACTED] So you had some relationships, because we
 20 know that from going through the list of people that
 21 you gave me. [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 A. Life.
 25 Q. Was it your parents?

1 Q. And what happened? [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 Q. But you pulled a car. Did you have a
 7 driver's permit at that time, a learner's permit?
 8 A. Yes.
 9 Q. So you would have had to have been at
 10 least 15?
 11 A. Yes.
 12 Q. [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 Q. Was anyone in the house with you?
 19 A. No.
 20 Q. Okay. And what happened?
 21 A. [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 Q. [REDACTED]

1 A. No.
 2 Q. Was it your peers, your female peers?
 3 A. I don't, I don't know.
 4 Q. School?
 5 A. I don't -- no, I don't think so.
 6 Q. Relationship with a guy --
 7 A. I don't know.
 8 Q. -- or guys? [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 Q. [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 Q. Do you know where you were?
 19 A. Taco Bell.
 20 Q. Which Taco Bell?
 21 A. Jog and Okeechobee.
 22 Q. [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 A. [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 Q. Well, who else --
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 Q. All right. So, anyhow, you took -- you
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 been just prior -- what did I say, '05?
 2 MR. MERMELSTEIN: Yeah.
 3 MR. CRITTON: Okay.
 4 BY MR. CRITTON:
 5 Q. [REDACTED] of -- just prior to [REDACTED] of [REDACTED]
 6 A. Correct.
 7 MR. CRITTON: Okay. We have to change the
 8 tape.
 9 THE VIDEOGRAPHER: Off the record a 3:46.
 10 This is the end of Tape 1.
 11 (A brief recess was held.)
 12 THE VIDEOGRAPHER: We're back on the
 13 record at 3:49 p.m. This is the start of
 14 Tape 2.
 15 BY MR. CRITTON:
 16 Q. Ms. Doe No. 3, before we changed the tape,
 17 I think you said that just before your 18th
 18 birthday, or before you turned 18, you had met your
 19 current husband, [REDACTED] which would have been
 20 sometime prior to [REDACTED] of [REDACTED]
 21 A. Correct.
 22 Q. Within a month or so. Is that a fair
 23 statement?
 24 A. Yes.
 25 Q. And I saw someplace that you met him

1 Q. [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 A. Because of me and my current husband's
 7 situation at the time.
 8 Q. What was the situation at that time?
 9 A. Lying, not having like any sexual activity or,
 10 you know, contact or just fighting.
 11 Q. Do you remember when you first met
 12 [REDACTED], your husband?
 13 A. Yeah.
 14 Q. When? What year?
 15 A. I was just going to be 18.
 16 Q. Eighteen. You were 18. So that would
 17 have made you -- approximately just before [REDACTED] of
 18 [REDACTED], right?
 19 MR. MERMELSTEIN: No. She was born in
 20 [REDACTED].
 21 MR. CRITTON: Right. So, just before she
 22 was 18, so 17.
 23 MR. MERMELSTEIN: Eighteen is [REDACTED] of
 24 [REDACTED] is when she turned 18.
 25 MR. CRITTON: Right. Oh, so it could have

1 through MySpace?
 2 A. Yes.
 3 Q. All right. Did you converse over MySpace
 4 for a period -- did someone introduce you and say,
 5 hey, you should hook up with this guy?
 6 A. Yes.
 7 Q. All right. So you MySpaced each other,
 8 you liked what each other looked like, what you said
 9 over the social networking, and decided to get
 10 together and meet?
 11 A. Yes.
 12 Q. Okay. Within how long after you met did
 13 you start dating; that is, if I had to say, when did
 14 you-all start dating?
 15 A. Sometime after June 26th.
 16 Q. Of 2006?
 17 A. Yes.
 18 Q. And I think you were married in September
 19 of '08?
 20 A. Yes.
 21 Q. So, sometime between June 26 of '06 and
 22 September of '08, [REDACTED]
 23 [REDACTED] ?
 24 A. Yep. Yes.
 25 Q. Can you -- knowing those parameters now,

1 can you give us a better point in time when that
 2 occurred?
 3 A. No.
 4 Q. [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 Q. What happened? Tell me what you, what
 8 happened.
 9 A. I took the pills, sat there, and then [REDACTED]
 10 called me and I talked to her, and I told her what
 11 happened, and then she came and got me.
 12 Q. [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 Q. What, what had occurred between you and
 19 [REDACTED]
 20 [REDACTED]?
 21 A. We were fighting.
 22 Q. Okay. And I think you had now -- you were
 23 fighting. You said that you had no physical, no
 24 sexual relationship at the time?
 25 A. Yes, it was rough.

1 [REDACTED], had you and [REDACTED] ever had
 2 sexual intercourse?
 3 A. Yes.
 4 Q. Okay. But for some reason you had
 5 stopped?
 6 A. Yes.
 7 Q. Why had you stopped?
 8 A. Certain things that he would do to touch me
 9 just triggered things for me.
 10 Q. Such as what?
 11 A. Such as what, what?
 12 Q. What, what was so awful with your
 13 relationship that caused you to not -- [REDACTED]
 14 [REDACTED] his physical touching of you?
 15 MR. MERMELSTEIN: Objection to form.
 16 THE WITNESS: So what are you asking me?
 17 BY MR. CRITTON:
 18 Q. I am asking you, you say that something
 19 about what he was doing with you physically you
 20 found revolting, apparently.
 21 A. Yes.
 22 Q. Okay. What was he doing?
 23 A. Touching me a certain way that I didn't like.
 24 Q. Where?
 25 A. My breasts and my vaginal area.

1 Q. Okay. When you say -- not rough sexually,
 2 just no sex?
 3 A. Pretty much.
 4 Q. Okay. And that was unsatisfactory for
 5 you?
 6 A. For him.
 7 Q. Okay. Because you had said, I'm not going
 8 to have sex for whatever reason?
 9 A. I just never wanted to.
 10 Q. With him?
 11 A. At all.
 12 Q. Okay. At the time that you were going to
 13 kill yourself, had you had sexual relationship --
 14 had you had sex with [REDACTED]?
 15 A. At the time I was trying to?
 16 Q. Yes, ma'am.
 17 A. Prior?
 18 Q. Yes. Let me ask it again. You said, he
 19 obviously was complaining that you weren't having a
 20 sexual relationship, correct?
 21 A. Correct.
 22 Q. All right. You were fighting about that
 23 and probably other things, correct?
 24 A. Correct.
 25 Q. All right. As of the time that you [REDACTED]

1 Q. And you just didn't like what he was
 2 doing?
 3 A. Yes.
 4 Q. Because you didn't -- had other people
 5 done that to you before?
 6 A. Yes.
 7 Q. Okay. Who?
 8 A. Epstein.
 9 Q. Okay. Had you ever told anybody this?
 10 A. Told anybody what?
 11 Q. What you just told me.
 12 A. Yes.
 13 Q. Okay. [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 Q. So, it should -- if you told her that, it
 18 should be in your notes?
 19 MR. MERMELSTEIN: Objection, her notes?
 20 MR. CRITTON: Let me strike. Her notes,
 21 correct.
 22 MR. MERMELSTEIN: Objection to form.
 23 THE WITNESS: I don't know; I've never
 24 seen them.
 25

1 BY MR. CRITTON:
 2 Q. Okay. Had post -- prior -- after the time
 3 that you went to see Mr. Epstein where you were at
 4 his house on the one occasion where there was
 5 contact between the two of you in June of '04, you
 6 had had relations with whom? Do you remember?
 7 I probably should go back to Interrogatory
 8 Answer No. 4, if you would take a look at those
 9 again.
 10 THE WITNESS: Look at this one?
 11 MR. MERMELSTEIN: Yeah, Exhibit 4.
 12 THE WITNESS: Which one is Exhibit 4, that
 13 one? Okay. Question number what?
 14 MR. MERMELSTEIN: I'm sorry. What's the
 15 question, Bob?
 16 BY MR. CRITTON:
 17 Q. The question is -- if you go to question
 18 18, is which -- after Mr. Epstein -- after you had
 19 been at Mr. Epstein's house, you had had sexual
 20 relations with [REDACTED] Brewer (sic), correct?
 21 A. Brewster.
 22 Q. I'm sorry, [REDACTED] Who else? [REDACTED]
 23 [REDACTED] --
 24 A. Uh-huh. Yes.
 25 Q. -- and [REDACTED]. Anyone else?

1 then touching me from my buttocks to my vaginal area.
 2 Q. You say touching your -- say it again, the
 3 last was?
 4 A. My butt to my vaginal area.
 5 Q. And what do you mean by that? Describe
 6 exactly what you say Mr. Epstein did.
 7 A. Caressed my butt and then slowly swooped from
 8 the crack down to the front of my vagina area.
 9 Q. Was he between your -- he, Mr. Epstein,
 10 between your legs, or was he behind your butt with
 11 his hand, and then you say swooped. Then did he go
 12 between your legs --
 13 A. Yes.
 14 Q. -- to touch you in the vaginal area?
 15 A. Yes.
 16 Q. Had no other male ever done that with you?
 17 A. No.
 18 Q. No other man in, since 2003, in the 12 or
 19 14 people that we talked about had ever touched your
 20 buttocks and then reached underneath and touched you
 21 in the vaginal area?
 22 A. Not that way.
 23 Q. Had any males ever touched you in the
 24 buttocks and then touched you in the vaginal area in
 25 a different way?

1 A. I think that's it.
 2 Q. Okay. And with separating out [REDACTED],
 3 had you ever had any problems with having sexual
 4 relations either with [REDACTED] with
 5 [REDACTED], or with [REDACTED]?
 6 A. No.
 7 Q. Okay. In each of those instances, I
 8 assume, in addition to the intercourse, there was
 9 touching?
 10 A. Yes.
 11 Q. But that didn't bother you at all, or I
 12 won't say it didn't bother you. You enjoyed it?
 13 MR. MERMELSTEIN: Objection to form.
 14 THE WITNESS: I enjoy being touched, yes.
 15 BY MR. CRITTON:
 16 Q. All right. In what way was [REDACTED]
 17 [REDACTED] touching you that somehow -- well, let me
 18 strike that.
 19 You say he was touching you in a way that,
 20 what, reminded you -- you need to tell me again what
 21 you said about Epstein. What was --
 22 A. He touched me the same way Epstein touched me.
 23 Q. Okay. Which was exactly how? Tell me
 24 what he was doing.
 25 A. Groping my breasts, touching my nipples, and

1 A. Yes.
 2 Q. Okay. So again you need to tell me then
 3 what you allege Mr. Epstein did so I understand
 4 exactly the move that you didn't like.
 5 A. The swooping from the butt to the vaginal
 6 area.
 7 Q. What do you mean by "swooping"?
 8 A. Here's my butt; here's my vagina. He would go
 9 over it and then he went in towards, like try to get in
 10 between my legs to touch my vagina, the way that it --
 11 the way, the motion, the way that he did it.
 12 Q. Okay. And nobody else had done that until
 13 [REDACTED] did it that way?
 14 A. Correct.
 15 Q. And other males had -- well, in fact, most
 16 of the other males that we talked about, they had
 17 touched your breasts before?
 18 A. Yes.
 19 Q. Okay. And they had touched your nipples?
 20 A. Yes.
 21 Q. All right. And what did Mr. Epstein do
 22 when he touched your breasts or your nipples?
 23 A. Pinched them.
 24 Q. Okay. And no other, of the 13 or 14 men
 25 that we've described had, other than [REDACTED], had

1 ever pinched your nipple before?
 2 A. I, I don't know.
 3 Q. All right. So, is it, is it your
 4 testimony then -- so what was [REDACTED] doing that you
 5 didn't like?
 6 A. I just told you.
 7 Q. Okay. Well, separate and apart from what
 8 you described, touching your buttocks and then you
 9 in the vaginal area, how was he touching your -- you
 10 said you don't -- you then -- well, let me start
 11 again.
 12 Separate and apart from touching your
 13 buttocks and the vaginal area, which you said was
 14 similar to the way Mr. Epstein had done it, correct?
 15 A. Yes.
 16 Q. Okay. Had he done that for a long -- he,
 17 [REDACTED], done that for a long period of time?
 18 MR. MERMELSTEIN: Objection to form.
 19 BY MR. CRITTON:
 20 Q. That is, touched your buttocks and then
 21 touched your vaginal area in a way that you thought
 22 was similar to what Mr. Epstein had done.
 23 A. No.
 24 Q. Okay. Is it something he just started
 25 doing?

1 A. Yes.
 2 Q. Okay. Did you tell him you didn't like
 3 it?
 4 A. Yes.
 5 Q. And what did he say?
 6 A. I don't know.
 7 Q. Well, if you hadn't had sexual intercourse
 8 or sex, sexual conduct -- contact for a period of
 9 time, what was occurring, then, during that time
 10 period where you're just not being close with one
 11 another at all --
 12 A. Yes.
 13 Q. -- for a period of how many months?
 14 A. For a long time.
 15 Q. What's a long time to you?
 16 A. More than a month.
 17 Q. And did you tell him that you didn't like
 18 what he was doing?
 19 A. Yes.
 20 Q. And what did he say?
 21 A. Why.
 22 Q. Did you tell him?
 23 A. Yes.
 24 Q. And what did he say?
 25 A. He didn't have much to say.

1 Q. Okay. How was he touching your breasts in
 2 a way that you thought was similar to what
 3 Mr. Epstein had done?
 4 A. Just the way he grabbed them.
 5 Q. How?
 6 A. Like, I don't, I don't know how to describe
 7 it.
 8 Q. How was he touching you differently than
 9 [REDACTED] had, or [REDACTED], or [REDACTED] had
 10 done?
 11 MR. MERMELSTEIN: Objection to form.
 12 THE WITNESS: Because I don't -- I don't
 13 know. I don't know.
 14 BY MR. CRITTON:
 15 Q. Would you agree with me that it would not
 16 be unusual for a man to stimulate a woman's breasts,
 17 her nipples, as part of foreplay?
 18 MR. MERMELSTEIN: Objection to form.
 19 THE WITNESS: I don't know.
 20 BY MR. CRITTON:
 21 Q. You don't know. Okay. So you told
 22 [REDACTED] you didn't like that, and his response was?
 23 A. Sorry.
 24 Q. Okay. And what -- so you decided, as a
 25 result of that, [REDACTED]

1 A. No.
 2 Q. [REDACTED]
 3 [REDACTED]
 4 A. Because we had been fighting and we weren't --
 5 you know, we weren't -- we just were not on the same
 6 page anymore. We were not communicating well.
 7 Q. All right. You called [REDACTED]?
 8 A. Yes.
 9 Q. [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 Q. Did she come to get you?
 13 A. Yes.
 14 Q. Where did she take you?
 15 A. To my house.
 16 Q. And what did she do? What did you do?
 17 A. [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 Q. What else?
 21 A. Then I went to bed.
 22 Q. Did she stay there with you?
 23 A. Yes.
 24 Q. [REDACTED]
 25 [REDACTED]

1 Q. All right.
 2 A. Or [redacted] and his brother. And I drank the
 3 beer. We ended up leaving. I went over to that house.
 4 We were just going to spend the night there instead of
 5 driving all the way back out there. I fell asleep on
 6 the couch, and then I moved into the bedroom.
 7 I thought I locked the door, and then next
 8 thing you know I have a guy on top of me, and I
 9 can't move and I wake up the next morning.
 10 Q. Who was the guy, brother?
 11 A. I think so, yes.
 12 Q. And obviously you knew [redacted] and you knew
 13 her boyfriend [redacted]?
 14 A. Yes.
 15 Q. You know what [redacted]'s last name was?
 16 A. No.
 17 Q. But you could have gotten [redacted]'s
 18 brother's -- [redacted]'s last name from [redacted] true?
 19 A. Yes. I don't remember his last name.
 20 Q. I understand that.
 21 A. Okay.
 22 Q. I mean as you sit here today, but you knew
 23 it back then?
 24 A. Yeah.
 25 Q. All right. And the only other guy that

1 A. Yes.
 2 Q. Where?
 3 A. My legs.
 4 Q. And could you remember from the night
 5 before what this guy being on you; that is, brother
 6 being on you, that he had sexually assaulted you?
 7 A. Yes.
 8 Q. Okay. And you knew that he had penetrated
 9 you with his penis?
 10 A. Yes.
 11 Q. All right. And did you scream for help
 12 that night?
 13 A. I couldn't do anything.
 14 Q. Why?
 15 A. Because I was lifeless.
 16 Q. And you think that they had given you some
 17 sort of drug?
 18 A. Yes.
 19 Q. When you woke up the next morning, did you
 20 tell [redacted]?
 21 A. No.
 22 Q. Did you tell [redacted]?
 23 A. No.
 24 Q. You did tell your mother?
 25 A. Yes.

1 was in the house, the only guys that were in the
 2 house were [redacted] and his brother?
 3 A. Yes.
 4 Q. All right. And one of the guys ended up
 5 on top of you?
 6 A. Yes.
 7 Q. Okay. And it wasn't [redacted]?
 8 A. No.
 9 Q. So, it had to have been his brother?
 10 A. Yes.
 11 Q. So, when you woke up the next morning,
 12 were your clothes off?
 13 A. I --
 14 Q. Or pulled down?
 15 A. Yeah.
 16 Q. Okay. And --
 17 A. My pants.
 18 Q. -- you had on pants. Were you -- did you
 19 have on a skirt and like underwear pants, or are you
 20 talking like jeans?
 21 A. Jeans, like dress pants.
 22 Q. All right. And were your pants and your
 23 panties pulled down?
 24 A. Yes.
 25 Q. And did you have any marks on you at all?

1 Q. And what did your mother say?
 2 A. [redacted]
 3 [redacted]
 4 [redacted]
 5 [redacted]
 6 [redacted]
 7 [redacted]
 8 [redacted]
 9 [redacted]
 10 [redacted]
 11 [redacted]
 12 [redacted]
 13 Q. And I will ask you to assume, at least,
 14 [redacted]
 15 [redacted]
 16 [redacted]
 17 [redacted]
 18 [redacted]
 19 [redacted]
 20 [redacted]
 21 [redacted]
 22 [redacted]
 23 [redacted]
 24 [redacted]
 25 [redacted]

1 A. [REDACTED]
 2 Q. [REDACTED]
 3 A. [REDACTED]
 4 Q. [REDACTED]
 5 A. [REDACTED]
 6 Q. [REDACTED]
 7 A. [REDACTED]
 8 Q. [REDACTED]
 9 A. [REDACTED]
 10 Q. [REDACTED]
 11 A. [REDACTED]
 12 Q. And that's, that's with [REDACTED] and you
 13 had [REDACTED]?
 14 A. Yes.
 15 Q. Okay. I remember that.
 16 As a result of having been raped, did you,
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 Q. And did your -- what was your mother's
 22 position?
 23 A. Same.
 24 Q. And why didn't you? You knew who it was,
 25 so why didn't you call the police?

1 happened.
 2 BY MR. CRITTON:
 3 Q. Were you embarrassed by what had happened?
 4 A. A little bit, yes.
 5 Q. And from looking at some of the reports,
 6 this is an event that [REDACTED]
 7 [REDACTED]
 8 [REDACTED] true?
 9 A. True.
 10 Q. Okay. Because you considered it to be an
 11 emotionally disturbing event, true?
 12 A. Somewhat, yeah.
 13 Q. Okay. So now, the fact that the guy raped
 14 you, drugged you and raped you, it's a somewhat
 15 disturbing event?
 16 MR. MERMELSTEIN: Objection to form.
 17 BY MR. CRITTON:
 18 Q. I just want the ladies and gentlemen of
 19 the jury to understand that's how you've described
 20 that event now.
 21 MR. MERMELSTEIN: Objection to form.
 22 THE WITNESS: I've moved on.
 23 BY MR. CRITTON:
 24 Q. You've moved on. Okay. Did you sue him?
 25 Did you bring a lawsuit against the brother?

1 A. I was scared.
 2 Q. Of what?
 3 A. Just having to go through that.
 4 Q. What did you think you'd have to go
 5 through?
 6 A. Humiliation.
 7 Q. Okay. Did you -- as a result of having
 8 been raped by the brother, you -- that was a
 9 traumatic situation for you, was it not?
 10 A. Yes.
 11 Q. Were you in shock?
 12 A. Yes.
 13 Q. Did you find it shameful and humiliating
 14 and embarrassing?
 15 MR. MERMELSTEIN: Objection to form.
 16 THE WITNESS: No.
 17 BY MR. CRITTON:
 18 Q. Okay. You didn't -- you weren't ashamed
 19 at all --
 20 MR. MERMELSTEIN: Objection to form.
 21 BY MR. CRITTON:
 22 Q. -- because he had pushed himself on you
 23 and drugged you, correct?
 24 MR. MERMELSTEIN: Objection to form.
 25 THE WITNESS: I was ashamed that it

1 A. I didn't press any charges.
 2 Q. That's not my question. Pressing charges
 3 is criminal. Tell the ladies and gentlemen of the
 4 jury whether you brought a civil suit against the
 5 man who sexually assaulted you and drugged you and
 6 raped you.
 7 A. No.
 8 Q. Why not?
 9 A. Because -- I don't know.
 10 Q. Because he didn't have any money; wasn't a
 11 billionaire, maybe?
 12 A. No.
 13 MR. MERMELSTEIN: Objection, form.
 14 Argumentative.
 15 BY MR. CRITTON:
 16 Q. How about Mr. [REDACTED], the one who had
 17 sexually assaulted you when you were approximately
 18 13 years old? Did you and/or your parents on your
 19 behalf institute a lawsuit against him suing him for
 20 having sexually molested you?
 21 A. No.
 22 Q. Why not?
 23 A. I don't know.
 24 Q. In 2000, in November of 2002, you and your
 25 friend -- well, let me strike that.

1 Were you arrested or -- well, let me
 2 strike that. Did you have a -- in November of 2002,
 3 were you and one of your friends -- one of you -- I
 4 need to start once more.
 5 In November of 2002, did you and one of
 6 your friends get in trouble for having [REDACTED]
 7 [REDACTED]'s home?
 8 A. No.
 9 Q. Okay. Do you remember, you and a girl
 10 named [REDACTED] (phonetic) -- is that one of
 11 your friends?
 12 A. Yes.
 13 Q. [REDACTED]
 14 [REDACTED]?
 15 A. I didn't do that.
 16 Q. Who did that?
 17 A. I don't know.
 18 Q. Okay. Were you accused of doing that?
 19 A. Yes.
 20 Q. Okay. Do you remember there was a police
 21 report?
 22 A. Yes.
 23 Q. Okay. Is that the same [REDACTED]
 24 who you and she -- she took her mom's ATM card and
 25

1 gave it to you and [REDACTED]
 2 [REDACTED] --
 3 MR. MERMELSTEIN: Objection to form.
 4 BY MR. CRITTON:
 5 Q. -- so [REDACTED]
 6 A. That's [REDACTED] yeah.
 7 Q. Same person that was accused of --
 8 A. Yes.
 9 Q. -- having [REDACTED]
 10 [REDACTED]?
 11 A. Yes.
 12 Q. All right. And is [REDACTED] the one
 13 that you got in a fight with that one time?
 14 A. Yes.
 15 Q. Okay. And that was over a boy?
 16 A. Yes.
 17 Q. Okay. And you deny that you had anything
 18 to do with [REDACTED]
 19 [REDACTED]?
 20 A. Yes.
 21 Q. Okay. Did [REDACTED] do it?
 22 A. I don't know.
 23 Q. You saw [REDACTED]
 24 [REDACTED]; is that correct?
 25 A. Yes.

1 Q. Okay. And [REDACTED]
 2 [REDACTED].
 3 [REDACTED].
 4 Q. I'm sorry?
 5 A. We found her.
 6 Q. Who is "we"?
 7 A. My mom and I.
 8 Q. [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 Q. How many times were you -- let me strike
 17 that.
 18 Were you only engaged to [REDACTED] on one
 19 occasion, or were you engaged on more than one
 20 occasion; that is, then broke it off and then got
 21 engaged again?
 22 MR. MERMELSTEIN: Objection, form.
 23 THE WITNESS: We broke up.
 24 BY MR. CRITTON:
 25 Q. When you saw her -- well, let me strike

1 that. You, you said you broke up. At one time were
 2 you engaged and then did you call off the
 3 engagement?
 4 A. Uh-huh. Yes.
 5 Q. On how many occasions did you do that?
 6 A. Once, I think.
 7 Q. You made a request for -- well, let me
 8 strike that.
 9 When you saw [REDACTED]
 10 [REDACTED] you had already been
 11 to Mr. Epstein's home, correct, because you had gone
 12 to his house in 2004?
 13 A. Yes.
 14 Q. [REDACTED]
 15 [REDACTED] did you?
 16 A. No.
 17 Q. Okay. And the reason you didn't [REDACTED]
 18 [REDACTED] because it was not a big event
 19 at that time, was it?
 20 MR. MERMELSTEIN: Objection to form.
 21 THE WITNESS: No.
 22 BY MR. CRITTON:
 23 Q. At the time that [REDACTED], you
 24 didn't have a multi-million dollar lawsuit against
 25 Mr. Epstein, did you?

1 MR. MERMELSTEIN: Objection to form.
 2 THE WITNESS: No.
 3 BY MR. CRITTON:
 4 Q. At the time [REDACTED] you
 5 didn't have an attorney, did you?
 6 A. No.
 7 Q. Okay. And because [REDACTED]
 8 [REDACTED], and you didn't file your
 9 lawsuit until [REDACTED] of 2008, correct?
 10 A. Correct.
 11 Q. [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 Did you specifically tell
 20 and this, and the date of [REDACTED] letter is
 21 September of 2009. Did you tell [REDACTED] not to
 22 send records that had been requested?
 23 A. No.
 24 Q. Okay. So her letter, she's not telling us
 25 the truth when she's saying she was told not to send

1 the records by you?
 2 MR. MERMELSTEIN: Objection to form.
 3 THE WITNESS: I told her what the, what
 4 they were requesting, what it was in detail,
 5 what case it was.
 6 BY MR. CRITTON:
 7 Q. Why didn't you give her the authority, why
 8 didn't you say you can send whatever records you
 9 want? Why did you tell her not to send the records?
 10 MR. MERMELSTEIN: Objection to form.
 11 That's not what she said.
 12 THE WITNESS: I told her what, what I
 13 needed the records for.
 14 BY MR. CRITTON:
 15 Q. Did you tell her specifically she didn't
 16 need to send the records? Yes or no.
 17 A. Not that I remember, no.
 18 Q. All right. [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 A. Yes.
 23 Q. She's also a female?
 24 A. He.
 25 Q. Oh, he's a he?

1 A. He's a he.
 2 Q. He's a he. Fancy that. [REDACTED]
 3 [REDACTED]
 4 [REDACTED] Does
 5 that meet with your recollection?
 6 A. Yes.
 7 Q. When you -- during the past -- you say,
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 Q. And?
 15 A. It's right by Wildcat Way.
 16 Q. Wildcat Way?
 17 A. Yes.
 18 Q. [REDACTED]
 19 [REDACTED]
 20 MR. MERMELSTEIN: The Wildcats.
 21 THE WITNESS: The Wildcats.
 22 BY MR. CRITTON:
 23 Q. [REDACTED]
 24 [REDACTED]
 25 A. Yeah. Over there.

1 Q. [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 Q. [REDACTED], did he play a role?
 14 A. That, myself.
 15 Q. And what were you feeling bad about
 16 yourself for?
 17 A. I don't know. I just, I just wasn't liking
 18 myself.
 19 Q. [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 Q. Was it before or after?
 23 A. Before.
 24 Q. I asked you to assume -- well, let me

1 strike that.
 2 Would it be a correct statement that you
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 MR. MERMELSTEIN: Objection to form.
 7 THE WITNESS: No.
 8 BY MR. CRITTON:
 9 Q. [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 A. [REDACTED]
 2 Q. [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 MR. MERMELSTEIN: Objection.
 16 BY MR. CRITTON:
 17 Q. Did you like [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 Does that meet
 23 with your recollection?
 24 A. Yes.
 25 Q. And the first time that you saw
 [REDACTED] -- well, let me strike that. You saw

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 Q. Well, if you did tell him, why would you
 14 have told him about that?
 15 A. I don't know if I told him.
 16 Q. [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 Q. Are both of your parents alcoholics?
 21 A. No.
 22 Q. Would you have described your mother as
 23 having an alcohol problem?
 24 A. No.
 25 [REDACTED]

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 -- let me strike that.
 6 [REDACTED]
 7 [REDACTED]
 8 A. I need to use the restroom.
 9 Q. Is that correct? Pardon?
 10 A. I need to use the restroom.
 11 Q. Okay. Let me just, just finish this one
 12 question.
 13 A. Sure.
 14 Q. Dr. -- you know what, I'll start when you
 15 get back.
 16 A. Okay.
 17 THE VIDEOGRAPHER: Going off the record at
 18 4:29 p.m.
 19 (A brief recess was held.)
 20 THE VIDEOGRAPHER: Back on the record at
 21 4:32 p.m.
 22 BY MR. CRITTON:
 23 Q. Ms. Doe No. 3, let me start again with
 24 what I was asking. That way we'll all be on the
 25 same stage.

1 Q. [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 Q. [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 A. I don't remember.

17 Q. Okay. And [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 true?

2 A. True.

3 Q. [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED] now that you had a lawsuit pending?

8 MR. MERMELSTEIN: Objection to form.

9 THE WITNESS: No.

10 MR. CRITTON: Okay. I have one other area

11 I would like to go into, and then I think I'm

12 pretty well done. Give me -- well, let me show

13 you --

14 What's the next exhibit, 6?

15 THE COURT REPORTER: Yes.

16 THE WITNESS: This is 4 and 5.

17 (Defendant's Exhibit No. 6 was marked for

18 identification.)

19 BY MR. CRITTON:

20 Q. Let me show it to your attorney. Your

21 answers to the first interrogatories. If you will

22 go to the second to the last page, it appears you're

23 verifying that the answers to the interrogatories

24 are true and correct. Tell me if that's your

25 signature for these; that is, you're verifying as to

1 A. [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 MR. MERMELSTEIN: Objection to form.

10 THE WITNESS: Not when you're seeking

11 help.

12 BY MR. CRITTON:

13 Q. [REDACTED]

14 [REDACTED], you didn't have a lawsuit seeking

15 millions of dollars from Mr. Epstein, did you?

16 MR. MERMELSTEIN: Objection to form.

17 THE WITNESS: No.

18 BY MR. CRITTON:

19 Q. When you -- [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 At that time you do have a pending lawsuit

25 seeking millions of dollars against Mr. Epstein,

1 the content and your answers to the first set of

2 interrogatories.

3 A. Yes.

4 Q. Go to Question 2.

5 A. Uh-huh.

6 Q. In 2000 -- it starts off -- it's a

7 question about your employment history. And if --

8 if I understand your question (sic) up until -- up

9 until you were, let's see, [REDACTED]

10 [REDACTED] years old during

11 that time period. Is that the first time you had

12 any type of job?

13 A. Yes.

14 Q. Then it appears that at least during 2005,

15 you had about eight different jobs.

16 A. Yes.

17 Q. All right. Were these all part-time jobs?

18 A. Yes.

19 Q. Okay. Are they in the order that you had

20 them; that is, was [REDACTED] your first job as

21 a hostess?

22 A. Yes.

23 Q. Okay. Did you quit that job or were you

24 terminated?

25 A. Quit.

1 Q. Okay. And then you did [REDACTED]
 2 [REDACTED] Nice touch. You were a dog sitter?
 3 A. Yes.
 4 Q. Did you quit that job or were you
 5 terminated?
 6 A. I quit.
 7 Q. And why did you quit the first two jobs?
 8 A. To -- I quit [REDACTED] because I got a job at a
 9 dog place, and I wanted to go to school to become a
 10 veterinarian. And I quit that place because it was too
 11 far.
 12 Q. To drive?
 13 A. Yeah. Yes. Sorry.
 14 Q. You were driving your own car at that
 15 time?
 16 A. Yes.
 17 Q. Then you worked -- went to work at your
 18 aunt's restaurant?
 19 A. Yes.
 20 Q. And is that is [REDACTED]
 21 A. [REDACTED]
 22 Q. [REDACTED]?
 23 A. Yeah.
 24 Q. That's your aunt?
 25 A. Yes.

1 Q. So she would say good things about you?
 2 A. I guess.
 3 Q. Then you went to -- you quit [REDACTED] and
 4 you went to [REDACTED] Why? And [REDACTED] is --
 5 A. It's a jewelry box -- a jewelry box.
 6 Q. Working in the mall?
 7 A. Yes.
 8 Q. Were you still working at [REDACTED] at the
 9 time?
 10 A. No.
 11 Q. And you quit that to work at -- did you
 12 quit that or were you terminated?
 13 A. I quit.
 14 Q. And then you went to [REDACTED]
 15 How long did you work there?
 16 A. A week or two.
 17 Q. Crummy job?
 18 A. It was telemarketing. I didn't like it.
 19 Q. And then you went to [REDACTED]
 20 [REDACTED]?
 21 A. Yes.
 22 Q. How long were you there?
 23 A. A couple of months.
 24 Q. Why did you leave there?
 25 A. The location of the place was not -- I was

1 more like her babysitter or groceries and cleaning. It
 2 was -- it took place at her house.
 3 Q. Oh, you mean she ran the business out of
 4 the house?
 5 A. Yeah.
 6 Q. So, you became like her personal --
 7 A. Yeah.
 8 Q. -- assistant?
 9 A. Pretty much.
 10 Q. So, even though you were getting ten bucks
 11 an hour, it wasn't -- I'm sorry, seven and a
 12 quarter, it wasn't worth it?
 13 A. No.
 14 Q. So, you quit there and went to [REDACTED]
 15 [REDACTED] which did what?
 16 A. It actually -- I think that's the [REDACTED].
 17 Q. I'm sorry?
 18 A. Yeah, that's the [REDACTED]. It's [REDACTED].
 19 Q. Well --
 20 A. [REDACTED] and then [REDACTED]
 21 Q. [REDACTED]. Is it a tanning parlor?
 22 A. Yes.
 23 Q. Okay. So you would check people in and
 24 out?
 25 A. Yes.

1 Q. Got ten bucks an hour?
 2 A. Yes.
 3 Q. Did you quit that job?
 4 A. I got let go.
 5 Q. Why?
 6 A. Because I changed the music in the CD player.
 7 Q. And you then got a job at [REDACTED]?
 8 A. Yes.
 9 Q. How long did you work there?
 10 A. Three days.
 11 Q. Why did you quite that job? Did you quit
 12 or did they terminate you?
 13 A. I quit.
 14 Q. Why?
 15 A. Because I was just standing there, and I
 16 didn't want to just stand.
 17 Q. 2006 now, you had a job animal -- [REDACTED]
 18 [REDACTED] --
 19 A. Yes.
 20 Q. -- in Palm Beach?
 21 A. Correct.
 22 Q. How long did you work there?
 23 A. Oh, a few months.
 24 Q. Okay. And why did you -- were you
 25 terminated or did you quit?

1 A. Yes, terminated.
 2 Q. Why were you terminated?
 3 A. I came in late three times.
 4 Q. And they said we can't have you because
 5 you're late too often?
 6 A. Yes.
 7 Q. And then you went to [REDACTED]
 8 [REDACTED] which is the alarm business?
 9 A. Yes.
 10 Q. And that's where you were when you were
 11 interviewed by the FBI?
 12 A. Yes.
 13 Q. You stayed there or were you terminated or
 14 did you quit?
 15 A. I was terminated.
 16 Q. Why?
 17 A. It was -- I work, I worked for [REDACTED]
 18 Q. I'm sorry?
 19 A. [REDACTED], a job placement employment. So
 20 they only needed me for a short amount of time.
 21 Q. All right. Then you went to [REDACTED]
 22 [REDACTED]?
 23 A. Yes.
 24 Q. What were you doing?
 25

1 Q. And your [REDACTED] is that right?
 2 A. Yes.
 3 Q. How long did you stay at [REDACTED]?
 4 A. A year.
 5 Q. Why did you leave there?
 6 A. Due to the construction business and the
 7 economy.
 8 Q. They let you go?
 9 A. Yes.
 10 Q. But [REDACTED] still works there?
 11 A. Yes.
 12 Q. And I may -- I need to ask you this: Did
 13 you tell me that your mom and dad are remarried, or
 14 they just live together?
 15 A. They're engaged.
 16 Q. How long have they been engaged?
 17 A. Christmas.
 18 Q. All right. So they're going to get
 19 remarried again?
 20 A. Yes.
 21 Q. Answer to Number 7 references that [REDACTED]
 22 [REDACTED] Can you even remember where
 23 the location was?
 24 A. [REDACTED]
 25 [REDACTED]

1 A. Well, I was maintaining the web sites, escrow,
 2 HUDs, just, you know.
 3 Q. How long did you work there?
 4 A. A while. More than a couple of months.
 5 Q. Did you quit or were you terminated?
 6 A. I got let go.
 7 Q. Why?
 8 A. The business was not good.
 9 Q. All right. Then you went to [REDACTED]
 10 [REDACTED]?
 11 A. Yes.
 12 Q. And you got a salary there at 23,000 bucks
 13 a year.
 14 A. Correct.
 15 Q. Did you have benefits as [REDACTED] 
 16 A. I got -- I mean, yes.
 17 Q. Like health insurance, 401(k), things like
 18 that?
 19 A. Yes.
 20 Q. What, what was your job? You say accounts
 21 payable?
 22 A. Accounts payable.
 23 Q. So, you would -- did you do that over the
 24 computer?
 25 A. Yes.

1 Q. Was it -- and I think you said it was a
 2 woman?
 3 A. Yeah, it was a woman.
 4 Q. Did you ever ask your mom if she remembers
 5 who she took you to?
 6 A. Yeah, we tried to look for her.
 7 Q. Number 9.
 8 A. Okay.
 9 Q. Okay. It says: Describe each injury
 10 (physical, emotional, mental) for which you are
 11 claiming damages in this case specifying the part of
 12 the body that was injured, the nature of the injury
 13 and any injuries you contend are permanent, the
 14 effects on you that you claim are permanent. Okay.
 15 That is damages you are claiming in this case. Do
 16 you see that?
 17 A. Yes.
 18 Q. All right. And just take a minute and
 19 look at your answer, please, and just tell me when
 20 you're done.
 21 A. Okay.
 22 Q. All right. You say, you suffered severe
 23 psychological, emotional, and psychical injuries.
 24 Do you know what a psychical injury is?
 25 A. Something to do with my head.

1 Q. All right. By the way, is this your
 2 answer --
 3 A. I don't --
 4 Q. -- that is, did you, did you come up with
 5 all the words that are in Number 9?
 6 A. No. I had assistance, yes.
 7 Q. Okay.
 8 MR. MERMELSTEIN: I'm going to object to
 9 the extent that it's assistance of counsel.
 10 She shouldn't disclose her conversations with
 11 counsel.
 12 BY MR. CRITTON:
 13 Q. I don't want to know the conversation, but
 14 would it be a correct statement that at least the
 15 paragraph that has all your answers in here, that
 16 this was done with the assistance of counsel?
 17 A. Correct.
 18 Q. All right. And would it be a correct
 19 statement that these words are not words that you
 20 chose, but they were done in conjunction with your
 21 attorneys?
 22 A. No.
 23 Q. That's not correct or that is correct?
 24 A. No, I chose these words.
 25 Q. Okay. So tell me about -- so severe

1 A. To some point.
 2 Q. Is it your testimony that having been
 3 molested at age 13 and having been raped at age 15
 4 are less significant events than your being in
 5 Mr. Epstein's presence for 20 or 30 minutes --
 6 MR. MERMELSTEIN: Objection --
 7 MR. CRITTON: -- in June of '04?
 8 MR. MERMELSTEIN: Objection to form.
 9 THE WITNESS: Yes.
 10 BY MR. CRITTON:
 11 Q. Why?
 12 A. Because I don't feel like I have to worry
 13 about those prior incidents anymore.
 14 Q. Why would you have to worry -- but for
 15 your having filed a lawsuit against Mr. Epstein
 16 seeking millions of dollars, why would you have to
 17 worry about that incident at all anymore?
 18 MR. MERMELSTEIN: Objection.
 19 BY MR. CRITTON:
 20 Q. Again, that's four years in your past.
 21 Well, it's almost six years in your past now. Why
 22 would you have to worry about that now?
 23 MR. MERMELSTEIN: Objection to form.
 24 THE WITNESS: Because I don't have to be
 25 afraid of running into those other people.

1 psychological, emotional and psychical injuries.
 2 A. That was assisted.
 3 Q. Okay. You, prior to your ever seeing
 4 Mr. Epstein, [REDACTED] correct?
 5 A. What was it?
 6 Q. Prior to your ever meeting Mr. Epstein in
 7 June of '04, [REDACTED] -- let me strike that.
 8 I'm going to ask it a different way.
 9 Would it be a correct statement, in your,
 10 your emotional state, your mental state, your
 11 psychological state, prior to the time that you ever
 12 met Mr. Epstein, you had had [REDACTED]
 13 [REDACTED] true?
 14 A. Before him?
 15 Q. Yes. Over other events in your life.
 16 A. Not necessarily.
 17 Q. Okay. So when you were molested by
 18 [REDACTED] at age 13, you didn't consider that a
 19 severe psychological and emotional event?
 20 MR. MERMELSTEIN: Objection to form.
 21 THE WITNESS: I don't know.
 22 BY MR. CRITTON:
 23 Q. When you were raped at age 15, you didn't
 24 consider that to be a severe and psychological and
 25 emotionally troubling event?

1 Unlike Epstein, I can still run into him; I
 2 could still see him.
 3 BY MR. CRITTON:
 4 Q. Well, since -- other than your voluntarily
 5 going back to Mr. Epstein's house on three occasions
 6 after June of '04, where have you ever seen
 7 Mr. Epstein in person again?
 8 A. Here.
 9 Q. Okay. Well, that was when you were here
 10 for your exam?
 11 A. Uh-huh.
 12 Q. All right. And it was as part of the
 13 lawsuit you were here for an exam. You were out
 14 [REDACTED], correct?
 15 A. Correct.
 16 Q. Okay. And he left the building for
 17 reasons -- I actually think he was coming to see me
 18 that day, but that's neither here nor there.
 19 But for your being out having and taking a
 20 [REDACTED], you never would have seen
 21 Mr. Epstein, would you?
 22 MR. MERMELSTEIN: Objection to form.
 23 THE WITNESS: No, I don't believe that.
 24 BY MR. CRITTON:
 25 Q. Okay. Well, if you -- you only ran into

1 him outside -- well, let me strike that.
 2 You were sitting there with your attorney
 3 Jessica Arbour having a [REDACTED] correct --
 4 A. Yes.
 5 Q. -- during the time that you were having
 6 the exam by Dr. Hall, correct?
 7 A. Yes.
 8 Q. You chose the time that you were going to
 9 have the break, true?
 10 A. Yes.
 11 Q. All right. And Mr. Epstein left the
 12 building and got into a car, correct?
 13 A. Yes.
 14 Q. All right. And what makes you think that
 15 you would have seen Mr. Epstein for any other reason
 16 but for your having chosen a particular time to take
 17 a [REDACTED] and he left the building?
 18 MR. MERMELSTEIN: Objection to form.
 19 THE WITNESS: Because he -- I work on [REDACTED]
 20 [REDACTED]. He lives on Palm Beach. I, I always
 21 worry about seeing him.
 22 BY MR. CRITTON:
 23 Q. Why, why would you worry about seeing him?
 24 You work in [REDACTED], correct?
 25 A. Yeah.

1 BY MR. CRITTON:
 2 Q. Okay. Other than that one occasion, had
 3 you seen him since June -- approximately June of
 4 '04 --
 5 A. No.
 6 Q. -- in person?
 7 A. No.
 8 Q. Okay. And have you seen him since?
 9 A. No.
 10 Q. You indicate as well in your answer to
 11 Number 9, you say you've had [REDACTED]
 12 [REDACTED]. Okay. Have you, you've told us
 13 about [REDACTED]
 14 None of those three events did you describe earlier
 15 had any relationship with Mr. Epstein.
 16 So what [REDACTED]
 17 [REDACTED] --
 18 MR. MERMELSTEIN: Objection to form.
 19 BY MR. CRITTON:
 20 Q. -- or your visit to Mr. Epstein?
 21 MR. MERMELSTEIN: Objection to form.
 22 THE WITNESS: Just the way that I feel. I
 23 mean, I don't, I don't know.
 24 BY MR. CRITTON:
 25 Q. You indicate you have feelings of

1 Q. Okay? Do you know where his house is?
 2 A. Yes.
 3 Q. All right. And have you seen him since
 4 the time you've been working? I mean other than
 5 during your [REDACTED], have you, have you seen him
 6 in person since the last time you were at his house?
 7 In fact, really the, I guess, the third time that
 8 you were at his house?
 9 A. No.
 10 Q. And the only times that you had seen
 11 Mr. Epstein in your whole entire life, other than
 12 during the [REDACTED] in 2009, 2010, I don't
 13 remember -- the day that you saw Dr. Hall, was that
 14 in 2009, last year?
 15 MR. MERMELSTEIN: It was in the Fall of
 16 '09.
 17 BY MR. CRITTON:
 18 Q. Okay. So in the Fall of '09, you had an
 19 exam by Dr. Hall, who is our expert. You take a
 20 [REDACTED] As you're outside having a [REDACTED]
 21 Mr. Epstein leaves the building that he's had an
 22 office in for over a year, and you see him, correct?
 23 A. Correct --
 24 MR. MERMELSTEIN: Objection to form.
 25 THE WITNESS: -- I saw him.

1 self-blame. What do you mean by that?
 2 A. That maybe if I would have said something or
 3 maybe if I would have screamed or something, I -- it
 4 wouldn't have happened.
 5 Q. You mean the first time you were there?
 6 A. At all. At all.
 7 Q. What do you mean, "at all"?
 8 A. At all. At any time that I was over there.
 9 Q. Well, but if you had the feeling of
 10 self-blame, and if you had screamed or yelled the
 11 very first time you were there, why then did you go
 12 back a second, third, and fourth time and take
 13 people there?
 14 MR. MERMELSTEIN: Objection to form.
 15 Asked and answered numerous times.
 16 THE WITNESS: So, do I have to answer?
 17 MR. MERMELSTEIN: Go ahead. You know,
 18 we're about a half hour past the time that we,
 19 we agreed on here.
 20 So you can go ahead and answer the
 21 question, but very little time left, so...
 22 THE WITNESS: Because I was young. I
 23 wasn't thinking. I really wasn't.
 24 BY MR. CRITTON:
 25 Q. You say fluctuations in weight and

1 appetite. You had fluctuations in weight and
 2 appetite long before you ever met Mr. Epstein, true?
 3 A. No.
 4 Q. Okay. So, some of the earlier reports
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 MR. MERMELSTEIN: Objection to form.
 10 THE WITNESS: Maybe they must have
 11 misunderstood.
 12 BY MR. CRITTON:
 13 Q. Okay. And do you consider yourself heavy
 14 now or light, or right, just right?
 15 A. Like a person?
 16 Q. No, no. We -- I'm talking about weight
 17 gains.
 18 A. I know. I don't -- I don't know.
 19 Q. Do you feel like you're at a good weight
 20 right now?
 21 A. Yeah, sure.
 22 Q. Have you weighed more than you do now?
 23 A. Yes.
 24 Q. Have you weighed less?
 25 A. Yeah.

1 you file a lawsuit against Mr. Epstein then, ma'am?
 2 A. Because I was scared. I was scared to come
 3 forward.
 4 Q. For what? Why were you scared?
 5 A. I didn't, I don't know what -- I didn't know
 6 what could happen.
 7 Q. What's happened?
 8 MR. MERMELSTEIN: Objection to form.
 9 BY MR. CRITTON:
 10 Q. Do you think your, your being scared was
 11 misplaced?
 12 A. What do you mean?
 13 Q. Well, you said you were scared.
 14 A. Right.
 15 Q. Are you still scared?
 16 A. Sometimes.
 17 Q. About what?
 18 A. What he could do next.
 19 Q. What has he ever done to you? What has he
 20 ever done to you other than your four voluntary,
 21 consensual visits that you made to his house?
 22 MR. MERMELSTEIN: Objection to form.
 23 THE WITNESS: He's made me suffer.
 24 BY MR. CRITTON:
 25 Q. How?

1 Q. So, [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 Q. And you say that's related to Mr. Epstein
 5 as distinct from all of the problems you've had with
 6 your estranged husband?
 7 A. Stress and --
 8 MR. MERMELSTEIN: Objection to form.
 9 BY MR. CRITTON:
 10 Q. I'm sorry?
 11 A. Stress.
 12 Q. Stress over the lawsuit?
 13 MR. MERMELSTEIN: Objection to form.
 14 THE WITNESS: Stress, just this whole
 15 situation.
 16 BY MR. CRITTON:
 17 Q. Whole situation being the ongoing lawsuit?
 18 A. No.
 19 Q. What situation then?
 20 A. What the, the way that I was -- the way that
 21 this took place, this Epstein case.
 22 Q. Why didn't you file a lawsuit after the
 23 last time you were at Mr. Epstein's house? Why
 24 didn't you tell your mother and then go hire a
 25 lawyer in 2004 or 2005 or 2006 or 2007? Why didn't

1 A. I, I just feel, I feel -- you know, I feel
 2 scared. I feel traumatized. I feel I just, I just
 3 don't feel comfortable anymore.
 4 Q. You, you indicate in Answer 10 that you
 5 had a loss of earning, loss of earnings, or a loss
 6 of earning capacity.
 7 A. I'm afraid to go to my job and see if he's
 8 ever going to walk in, or anyone that remotely looks
 9 like him, I'm afraid, always looking over my shoulder if
 10 that's him.
 11 Q. Why are you working on [REDACTED] then?
 12 A. Due to the economy, because I -- that's the
 13 only place I got hired.
 14 Q. Well, if you have a loss of earnings, it
 15 means that you've lost something. Can you describe
 16 any earnings that you've lost as a result of having
 17 been to Mr. Epstein's home?
 18 MR. MERMELSTEIN: Objection, form. Calls
 19 for a legal conclusion.
 20 BY MR. CRITTON:
 21 Q. Is there any money that you can describe
 22 that you've lost?
 23 MR. MERMELSTEIN: Again same objection to
 24 form.
 25 THE WITNESS: I don't know.

1 BY MR. CRITTON:
 2 Q. You also claim a loss of earnings -- of
 3 earning capacity in the future. Why do you
 4 believe -- and not legally. I'm not, I'm not
 5 looking for a legal opinion --
 6 Why do you believe you have lost your
 7 ability to earn money in the future because of your
 8 basically one-time visit with Mr. Epstein in 2000 --
 9 June of 2004?
 10 MR. MERMELSTEIN: Objection to form.
 11 THE WITNESS: Like I said, working at
 12 where I work, I'm always afraid.
 13 BY MR. CRITTON:
 14 Q. What's -- how does that affect your
 15 ability to earn money in the future because you went
 16 to Mr. Epstein's home? What loss have you
 17 sustained, you believe you would sustained in the
 18 future -- let me ask the question this way. Let me
 19 withdraw that.
 20 What ability to earn money in the future
 21 do you believe you have lost as a result of having
 22 gone to Mr. Epstein's house on four occasions, only
 23 once being with him?
 24 A. Because I can't be around old people.
 25 Q. But you're around them all the time?

1 A. Not all the time.
 2 Q. Is it anyone who has gray hair?
 3 MR. MERMELSTEIN: Objection, form,
 4 argumentative.
 5 THE WITNESS: I don't know.
 6 BY MR. CRITTON:
 7 Q. Well you said, older men, so...
 8 A. I mean like the same style, the same
 9 arrogance, the same persona as he carried, the same
 10 creepy smile.
 11 Q. You met -- other than seeing Mr. Epstein,
 12 I guess on the third occasion when he came down the
 13 stairs with [REDACTED], you met him or spent time with
 14 him, what, 20 or 30 minute on one occasion?
 15 A. Correct.
 16 Q. Did you ever see him in a sweatsuit?
 17 A. Yes.
 18 Q. On that occasion?
 19 A. No.
 20 Q. Okay. You saw him in a sweatsuit, on
 21 what, on one occasion when he came down the stair
 22 with [REDACTED].?
 23 A. Yes.
 24 Q. That's the only time you've ever seen him
 25 in a sweatsuit?

1 A. And I can't be around them --
 2 Q. I'm sorry.
 3 A. -- that, you know, wear creepy sweatsuits and
 4 look like him and has the same color hair, or you know,
 5 even the same type of car.
 6 Q. What kind of car does he have?
 7 A. A Mercedes.
 8 Q. How do you know?
 9 A. Because I've seen it numerous times.
 10 Q. Where have you seen it?
 11 A. At his house and out here.
 12 Q. Okay. Well, you said numerous times. You
 13 were at his house four times, so you saw it then?
 14 A. And outside here.
 15 Q. Okay. There, it was a Mercedes that he
 16 got into that day?
 17 A. Yes, sir.
 18 Q. Other than those times, have you ever seen
 19 his car?
 20 A. No.
 21 Q. Okay. And you say the job that you have
 22 right now, you're around older people, true?
 23 A. Yes.
 24 Q. Okay. Do you see a lot of people that you
 25 think look like Mr. Epstein? Is it anyone --

1 A. And here.
 2 Q. When you were taking your [REDACTED] that
 3 one day?
 4 A. Yes.
 5 MR. CRITTON: Okay. Got about two more
 6 minutes, and then I'm done.
 7 BY MR. CRITTON:
 8 Q. You describe yourself as having lower
 9 energy or lower ambition in answer to Number 9. Do
 10 you see that?
 11 A. In answer to number what?
 12 Q. Nine.
 13 A. Yes.
 14 Q. Okay. In fact, you -- it seems like you
 15 maintained a job almost continuously the last few
 16 years. You lose a job; you get a job right back,
 17 correct?
 18 A. Not necessarily. I will look for a job, yes.
 19 Q. How long have you been working at the
 20 [REDACTED] [REDACTED]?
 21 A. Seven months.
 22 Q. All right. Continuously?
 23 A. Yes.
 24 Q. Are you looking for another job now?
 25 A. Yes.

1 Q. Where? In what line of work?
 2 A. My career field.
 3 Q. To be a vet?
 4 A. Yes.
 5 Q. And what kind of job are you looking for?
 6 A. Kennel, a dog bather, groomer, anything.
 7 Q. Do you think you can earn more money or
 8 less money doing that?
 9 A. Less.
 10 Q. But that's something that you want to
 11 learn more about, so you're willing to take a cut in
 12 pay?
 13 A. Yes.
 14 Q. But before you take a new job -- I'm
 15 sorry, before you quit your existing job, will you
 16 make certain that you have another job?
 17 A. I'll try.
 18 Q. Well, would you just quit your job -- are
 19 you living at home now, did you say?
 20 A. Yes, I moved back home.
 21 Q. Do you contribute toward the rent, the
 22 electric or anything?
 23 A. No, no.
 24 Q. You have no expenses?
 25 A. No, I pay for my own, my own bills.

1 BY MR. CRITTON:
 2 Q. Is that what you're telling the jury?
 3 A. [REDACTED]
 4 [REDACTED]
 5 Q. Okay. You said you have corruption of
 6 morals and values. Have you done anything as a
 7 result of having been at Mr. Epstein's house and
 8 seen him really on the one occasion in June of '04
 9 that you believe has lead to a corruption of your
 10 morals or values?
 11 A. I don't think they are as high as they used to
 12 be.
 13 Q. And this is after you had been with --
 14 well, I'll save that.
 15 Well, let me ask it this way: Prior to
 16 meeting Mr. Epstein you had been with approximately
 17 ten or 11 males, correct, before you ever even met
 18 Mr. Epstein from age 13?
 19 A. Not from age 13.
 20 MR. MERMELSTEIN: Objection to form.
 21 BY MR. CRITTON:
 22 Q. [REDACTED] you would have been age 15?
 23 A. Uh-huh.
 24 Q. Fourteen and 15?
 25 A. Yes.

1 Q. But you have no expenses associated with
 2 the place where you're living?
 3 A. I buy food. That's it.
 4 Q. For yourself?
 5 A. No.
 6 Q. For you and your mom?
 7 A. Yes.
 8 Q. And your dad?
 9 A. Yes.
 10 Q. Okay. Other than -- and would it be a
 11 correct statement before you would quit the --
 12 A. [REDACTED]
 13 Q. -- [REDACTED], that you would have another job
 14 lined up because you would want to stay employed?
 15 A. I would want to.
 16 MR. CRITTON: Objection to form.
 17 BY MR. CRITTON:
 18 Q. [REDACTED]
 19 A. [REDACTED] before you ever met
 20 Mr. Epstein, didn't you?
 21 A. No, I don't think so.
 22 Q. Okay. So, you only really [REDACTED]
 23 [REDACTED] after you met Mr. Epstein?
 24 [REDACTED]
 25 MR. MERMELSTEIN: Objection, form.

1 Q. And how do you think Mr. Epstein corrupted
 2 your morals?
 3 A. Because he's an old man.
 4 Q. Other than him being an old man, can you
 5 think of any other reason he corrupted your morals?
 6 A. I think he took something away from me that he
 7 shouldn't, he shouldn't have had any right to.
 8 Q. And what was that?
 9 A. Innocence, youth.
 10 MR. CRITTON: I have no other questions.
 11 MR. MERMELSTEIN: Okay.
 12 THE VIDEOGRAPHER: Off the record at 5:07
 13 p.m. This is the end of Tape 2 and the end of
 14 the deposition.
 15 THE COURT REPORTER: Do you want to order
 16 this?
 17 MR. CRITTON: Yes.
 18 MR. MERMELSTEIN: I'll take a copy.
 19 (Witness excused.)
 20 (Deposition was concluded.)
 21
 22
 23
 24
 25

CERTIFICATE OF OATH
THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, the undersigned authority, certify that
JANE DOE NO. 3 personally appeared before me
and was duly sworn on the 6th day of April,
2010.

Dated this 19th day of April, 2010.

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

DATE: April 19th, 2010
TO: JANE DOE NO. 3
c/o Stuart S. Mermelstein, Esquire
MERMELSTEIN & HOROWITZ, P.A.
18205 Biscayne Boulevard
Suite 2218
Miami, Florida 33160

IN RE: Jane Doe No. 2 vs. Epstein

CASE NO.: 08-cv-80119-MARRA/JOHNSON

Please take notice that on Friday, the 6th of
April, 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.

As previously agreed to, the transcript will be
furnished to you through your counsel. Please read
the following instructions carefully:

At the end of the transcript you will find an
errata sheet. As you read your deposition, any
changes or corrections that you wish to make should
be noted on the errata sheet, citing page and line
number of said change. DO NOT write on the
transcript itself. Once you have read the
transcript and noted any changes, be sure to sign
and date the errata sheet and return three pages to
me.

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

Very truly yours,

Cynthia J. Hopkins

Cynthia Hopkins, RPR, FPR

I do hereby waive my signature.

JANE DOE NO. 3

CERTIFICATE
THE STATE OF FLORIDA
COUNTY OF PALM BEACH

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

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

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

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

Dated this 19th day of April, 2010.

Cynthia J. Hopkins
Cynthia Hopkins, RPR, FPR

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.

JANE DOE NO. 3
Job #1298

1 ERRATA SHEET
 2 IN RE: JANE DOE NO. 2 VS. EPSTEIN
 3 CR: Cynthia Hopkins
 4 DEPOSITION OF: JANE DOE NO. 3
 5 TAKEN: April 6th, 2010
 6 JOB NO.: 1298
 7 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
 8 PAGE # LINE # CHANGE REASON

9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____

17 Please forward the original signed errata sheet to
 18 this office so that copies may be distributed to all
 19 parties.
 20 Under penalty of perjury, I declare that I have read
 21 my deposition and that it is true and correct
 22 subject to any changes in form or substance entered
 23 here.

24 DATE: _____

25 SIGNATURE OF
 DEPONENT: _____