

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. 6

Tuesday, April 6, 2010

10:11 - 12:13 [REDACTED].

250 Australian Avenue
Suite 150
West Palm Beach, Florida 33401

Reported By:

Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting Services
Job No.: 1577

[REDACTED] PROSE COURT REPORTING AGENCY, INC. (5 [REDACTED])

1 APPEARANCES:
 2 On behalf of the Plaintiff:
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 10 On behalf of the Defendant:
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 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 THE VIDEOGRAPHER: This is the 6th day of
 3 April, 2010. The time is approximately
 4 10:11 [REDACTED]. This is the videotape deposition of
 5 Jane Doe No. 6 in the matter of Jane Doe versus
 6 Jeffrey Epstein.
 7

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. HOROWITZ: Sure. My name Adam
 15 Horowitz. I'm counsel for Plaintiff, Jane Doe
 16 No. 6.

17 MR. CRITTON: Bob Critton on behalf of
 18 Mr. Epstein.
 19 Thereupon,

20 (JANE DOE NO. 6),
 21 Having been first duly sworn or affirmed, was
 22 examined and testified as follows:

23 THE WITNESS: Yes.
 24 DIRECT EXAMINATION
 25

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BY MR. CRITTON:

1 Q. Ms. Doe No. 6, we're going to finish your
 2 deposition today. You understand that?

3 A. Yes.

4 Q. All right. Since you were here on
 5 February 17th of 2010, are you currently still
 6 employed by [REDACTED]?

7 A. No.

8 Q. All right. You -- when you came here or
 9 when you were here on February 17th. In fact, I
 10 think you were going to work when you left.

11 A. Yes.

12 Q. Correct?

13 A. Yes.

14 Q. And I think it was, was it your cousin who
 15 was the supervisor there?

16 A. Manager.

17 Q. She was the manager?

18 A. Assistant manager.

19 Q. So, you stopped working, it looks like
 20 answers to your interrogatories, you stopped working
 21 sometime in March. When?

22 A. March 12th.

23 Q. All right. Which would have been about a
 24 month after our deposition, correct?
 25

1 A. Yes.
 2 Q. Okay. And why did you stop working there?
 3 A. I got fired.
 4 Q. Why did they fire you?
 5 MR. HOROWITZ: Form.
 6 THE WITNESS: Because I didn't come into
 7 work.
 8 BY MR. CRITTON:
 9 Q. Is that what they told you?
 10 A. No. Yeah, well, it's because I didn't come
 11 in.
 12 Q. Okay. And why did you not go into work
 13 that day?
 14 A. Because one of my good friends was murdered
 15 early that morning.
 16 Q. What was his or her name?
 17 A. [REDACTED]
 18 Q. -- spell the last name, please.
 19 A. [REDACTED]
 20 Q. Oh, [REDACTED].
 21 A. Yes.
 22 Q. How long had you known Mr. [REDACTED]?
 23 A. Since I was ten or 11.
 24 Q. And he was a very close friend of yours?
 25 A. Family friend, yes.

1 Q. And how was he murdered?
 2 A. He was shot in his house.
 3 Q. And how did you hear about it?
 4 A. My friend Julie called me.
 5 Q. What is Julie's name, last name?
 6 A. [REDACTED].
 7 Q. Is she one of your good friends?
 8 A. Yes, she is my best friend, [REDACTED].
 9 Q. Okay. [REDACTED]?
 10 A. Yes, sir.
 11 Q. And [REDACTED], [REDACTED]?
 12 A. Yeah. I don't know how to spell it.
 13 Q. And did she know [REDACTED] as well?
 14 A. Yes.
 15 Q. How -- he was shot, where?
 16 A. In the chest.
 17 Q. And was it, it was a -- someone came into
 18 his house and shot him there?
 19 A. Yeah. They, well, they tried to come inside.
 20 He struggled with them, wouldn't let them in the door
 21 because his daughter and his fiancée were in the house.
 22 Q. Okay. Was, was he selling drugs or
 23 something? Was this drug related?
 24 MR. HOROWITZ: Form.
 25 THE WITNESS: Yes. They were trying to

1 rob him.
 2 BY MR. CRITTON:
 3 Q. And was he a drug dealer?
 4 MR. HOROWITZ: Form.
 5 THE WITNESS: I didn't know. They were
 6 trying to rob him. That's what the cop said.
 7 They didn't get into the house so I don't --
 8 BY MR. CRITTON:
 9 Q. Did you know [REDACTED] to be a drug dealer?
 10 A. [REDACTED] mother is the landlord or the, she
 11 works at the office and that's how me, me and him met
 12 during.
 13 MR. HOROWITZ: He is asking if you knew --
 14 MR. CRITTON: I heard --
 15 MR. HOROWITZ: -- if you him to be a drug
 16 dealer.
 17 THE WITNESS: No, I didn't, I didn't know.
 18 MR. CRITTON: I don't need help but that's
 19 fine.
 20 MR. HOROWITZ: Form.
 21 THE WITNESS: I didn't know.
 22 BY MR. CRITTON:
 23 Q. Had you ever done drugs with [REDACTED]?
 24 A. No.
 25 Q. Are you sure?

1 A. Yeah.
 2 Q. So, he was shot and killed that day?
 3 A. Yeah.
 4 Q. And you heard about it. What time were
 5 you supposed to be at work?
 6 A. I was supposed to be at my meeting at 12. It
 7 happened around like 9 or 10.
 8 Q. In the morning?
 9 A. Yes.
 10 Q. On the 12th?
 11 A. Yes.
 12 Q. Okay. Did you call your cousin and tell
 13 her?
 14 A. Yeah. Well, I went to the, I was supposed to
 15 go to the meeting. I went and I was crying, and they
 16 told me to go home. And I was supposed to go back to
 17 work at 5.
 18 Q. And did you go back at 5?
 19 A. No.
 20 Q. Why not?
 21 A. Because I called my manager. She was in
 22 Chicago, so I had to call my cousin which is the
 23 assistant manager. And she couldn't find nobody to
 24 cover for me, so...
 25 Q. Cover for you when?

1 A. For that night.
 2 Q. Why?
 3 A. I was supposed to work.
 4 Q. You didn't go in on Friday, the afternoon
 5 either?
 6 A. No, I -- my, the owner, because he owns, it's
 7 privately owned, he told me to go home for the meeting
 8 because I was supposed to be there at 12.
 9 Q. And he told you to come back at 5?
 10 A. He didn't tell me to come back. I was
 11 supposed to come back during my shift. It was already
 12 on the schedule.
 13 Q. Okay. So, did you go back at 5?
 14 A. No.
 15 Q. Why not?
 16 A. Because I couldn't go back to work.
 17 Q. Why not?
 18 A. Because I couldn't be sitting at [REDACTED]
 19 thinking what happened in my head.
 20 Q. Did call your -- anyone and tell me them
 21 that you couldn't come in because you were still so
 22 upset?
 23 A. Yeah, yeah.
 24 Q. And that was your cousin?
 25 A. Yeah. No, I called my manager, the manager in

1 the morning, or, well, at 12, and she was in Chicago.
 2 So, she said she couldn't do anything; I would have to
 3 call [REDACTED]. And [REDACTED] said she couldn't find anybody
 4 which [REDACTED] is my cousin.
 5 Q. To replace you at 5?
 6 A. Yeah.
 7 Q. And then you just decided that you
 8 couldn't go in --
 9 A. She --
 10 Q. -- because you were so upset?
 11 A. Yes.
 12 Q. And then did [REDACTED] then say you've been
 13 fired?
 14 A. No. My manager called me back and told me
 15 that it's not my immediate family, and that I have to
 16 go; if not, she's going to have to fire me, so...
 17 Q. And you said --
 18 A. Yeah.
 19 Q. -- go ahead and fire me?
 20 A. (Witness nods head).
 21 Q. Yes?
 22 A. Yes.
 23 Q. All right. And it appears that you then
 24 got another job?
 25 A. Yes.

1 Q. And how soon after you were fired from
 2 [REDACTED] did you get another job? It looks
 3 like at [REDACTED].
 4 A. Well, I started working last Saturday but I
 5 got the job the Thursday before that. So, like two
 6 weeks, ten days maybe.
 7 Q. All right. And have, have you been
 8 working there now?
 9 A. Yeah.
 10 Q. And is it a 40-hour-a-week job?
 11 A. Right now I am only part-time because I am
 12 still training they say, but I have been working
 13 eight-hour days.
 14 Q. Do you get any benefits with [REDACTED]?
 15 A. No.
 16 Q. If you start working there as a full-time
 17 employee, will you get benefits?
 18 A. No.
 19 Q. Just the \$7.50 an hour?
 20 A. Yes.
 21 Q. Are you doing any other employment at the
 22 current time?
 23 A. No.
 24 Q. Okay. And your boyfriend, [REDACTED] [REDACTED],
 25 he is still working I think heavy machinery or

1 something?
 2 A. No, he got fired. He got laid off, as a
 3 matter of fact, a little before my son's birthday.
 4 Q. Your son's birthday was when?
 5 A. [REDACTED]
 6 [REDACTED]?
 7 A. Yes.
 8 MR. CRITTON: Correct.
 9 MR. HOROWITZ: Of this year.
 10 THE WITNESS: That's when he turned two.
 11 BY MR. CRITTON:
 12 Q. And what happened, he just, they just said
 13 we don't need you any more; you're getting laid off?
 14 A. No. Their whole crew got laid off.
 15 Q. What's he been doing? Does he get
 16 unemployment?
 17 A. Well, he is trying to. They are waiting.
 18 Q. Is there a wait period or something?
 19 A. No. I think the company is fighting for it
 20 or --
 21 Q. You still get insurance benefits for the
 22 child though under --
 23 A. No. He got it through the job, I have to --
 24 Q. No, no. That's what I meant, he, he,
 25 your, Aaron, gets insurance coverage for your

1 child --
 2 MR. HOROWITZ: Form.
 3 BY MR. CRITTON:
 4 Q. -- still, right?
 5 THE WITNESS: What do you mean insurance
 6 coverage?
 7 BY MR. CRITTON:
 8 Q. You testified at your last deposition
 9 that, that he had insurance benefits, [REDACTED]?
 10 A. He has health.
 11 Q. Health insurance benefits which were
 12 applicable to your son.
 13 A. Through the job.
 14 Q. Right. So, he still has those?
 15 A. I don't think so since he got laid off.
 16 Q. How big, how big a business is it?
 17 A. It's -- I don't know.
 18 Q. Two people?
 19 A. I just know he works there.
 20 Q. Is it 20 or 30 people, do you think?
 21 A. I don't know. I know he works there on a crew
 22 with a couple of people.
 23 Q. Tell, tell him about Cobra because under
 24 the federal law he is entitled and the employer has
 25 to pay it so ...

1 current time relating to Mr. Epstein or any other
 2 emotional condition that you have?
 3 A. No.
 4 Q. You and [REDACTED] talk anymore about marriage,
 5 yes or no?
 6 A. Yeah.
 7 Q. Any plans yet?
 8 A. No.
 9 Q. Since your deposition have you seen or
 10 spoken with either Jane Doe or [REDACTED]?
 11 A. I seen Jane Doe at the funeral.
 12 Q. Of [REDACTED] [REDACTED]?
 13 A. Yes.
 14 Q. Okay. Was it a pretty sad funeral?
 15 A. Yeah.
 16 Q. And did you feel -- I mean, apparently it
 17 affected you enough that you didn't want to go to
 18 work?
 19 A. Yeah.
 20 Q. Does it still affect you now?
 21 A. Yeah. I think about him a lot.
 22 Q. Because you had other individuals, you had
 23 a former boyfriend, Mr. [REDACTED], who shot himself,
 24 correct?
 25 A. Yes, but that's different.

1 A. He was --
 2 Q. He's not, he is not getting it?
 3 A. He was paying his health benefits out of his
 4 check, so...
 5 Q. So, the company didn't pay it?
 6 A. He was paying co-fees for it, so I don't --
 7 co-pay, I don't think.
 8 Q. Tell him to still check. Have you seen,
 9 since your deposition on February 17th, 2010, have
 10 you seen any psychologist or psychiatrist, mental
 11 health counselors for any reasons relating to
 12 Epstein or any other psychiatric or psychological
 13 issues?
 14 A. Since the last time I seen you?
 15 Q. Yes, ma'am.
 16 A. No.
 17 Q. Have you seen any physicians for any
 18 reason?
 19 A. No.
 20 Q. Medical doctors, medical, been to an
 21 emergency room for any reason?
 22 A. No, no.
 23 Q. And you have no -- do you have any
 24 appointments to see a psychologist or psychiatrist
 25 or a mental health counselor for any reasons at the

1 Q. And how is that different?
 2 A. Because someone took [REDACTED] from his
 3 two-year-old daughter. She was right behind him when he
 4 was shot. They took him from her.
 5 Q. Okay. And how does that make you feel?
 6 A. It's wrong.
 7 Q. Of course it's wrong, but how does it make
 8 you feel?
 9 A. That just -- I don't know, just I could lose,
 10 you know, my family or anybody quick. It just didn't --
 11 it doesn't feel real.
 12 Q. Okay. And, and because the same thing
 13 could happen with you or it could happen with
 14 [REDACTED] --
 15 A. It could happen to anybody. They, they didn't
 16 even, supposedly they didn't even know him. That's what
 17 the cops say. They didn't even know him that they just
 18 heard that he was doing something and went and knocked
 19 on the door.
 20 Q. You said "they, they heard" that he was
 21 doing something; the people who shot him?
 22 A. Yes.
 23 Q. What did they hear? What did the cops
 24 say?
 25 A. The cop said that they heard that he was, had

1 money or he was dealing drugs. I don't know.
 2 Q. So, that's why they purportedly broke into
 3 the house?
 4 A. They didn't break in. They tried.
 5 Q. Oh, and they just then shot through the
 6 door?
 7 A. He was standing at the door fighting with them
 8 because they were trying to get into the house.
 9 Q. Oh, was he actually outside of the house?
 10 A. He was -- he answered the door because they
 11 knocked and they had a gun and tried to get into the
 12 house, and his daughter was behind him.
 13 Q. Did [REDACTED] go with you to the funeral?
 14 A. Yes.
 15 Q. And you saw Jane Doe there. Did you talk
 16 to Jane Doe at all?
 17 A. No.
 18 Q. You just saw her there?
 19 A. Yeah.
 20 Q. How about have you, have you spoken with
 21 her separate and apart from seeing her at the
 22 funeral?
 23 A. No.
 24 Q. Have you talked to [REDACTED] at all?
 25 A. No.

1 Q. Did you -- the experience with or what you
 2 have at least seen with [REDACTED] [REDACTED], pretty
 3 traumatic for you?
 4 A. Yeah. It just hurts you know. It's wrong.
 5 Q. Had, had any nightmares about it or --
 6 A. No.
 7 Q. Had any trouble sleeping?
 8 A. No. I just think about him, you know, when
 9 I'm in my neighborhood or go by his house or something.
 10 Q. Did you know his parents?
 11 A. Yeah.
 12 Q. Okay. And did you go back to the house
 13 for the reception --
 14 A. Yeah, yeah, I've been at --
 15 Q. Or like the wake afterwards?
 16 A. I have been at her house for like 10 days now.
 17 Q. Every day?
 18 A. Yeah.
 19 Q. Okay. And how is the mother doing?
 20 A. She's actually keeping everybody together.
 21 Q. Does he have other brothers and sisters?
 22 A. Yeah.
 23 Q. From listening to your testimony on
 24 February 17th, Ms. Doe, events like what happened to
 25 [REDACTED] [REDACTED], what happened with your mother when

1 you were in the car accident and you thought she
 2 might die, the events with [REDACTED] [REDACTED], they
 3 are all --
 4 A. [REDACTED] [REDACTED]
 5 Q. I am sorry, [REDACTED] [REDACTED] -- all seem to
 6 a significance impact on you?
 7 MR. HOROWITZ: Form.
 8 BY MR. CRITTON:
 9 Q. Is that true?
 10 A. I mean he just died like two weeks ago.
 11 That's why it has an impact on me. It is still fresh.
 12 Q. Are you then saying that the events
 13 surrounding [REDACTED] [REDACTED] having committed suicide
 14 so close, so close to you, no longer has an effect
 15 on you?
 16 A. I didn't say that. I'm just, you know, I mean
 17 it's different when somebody steals their own life, and
 18 when someone gets their life stolen from them. It's way
 19 different.
 20 Q. You mean a suicide versus --
 21 A. Yeah.
 22 Q. -- versus a random murder?
 23 A. It's way different, yes.
 24 Q. Which do you consider more, like,
 25 traumatic from your perspective?

1 MR. HOROWITZ: Form.
 2 THE WITNESS: It's all pretty traum --
 3 sad, you know, that this had to happen to good
 4 people but it's what happens.
 5 BY MR. CRITTON:
 6 Q. The incident with your mother when you
 7 were in the automobile accident back in 2004, does
 8 that still bother you as well? Well, let me strike
 9 that. The accident had an impact on you at the time
 10 certainly, correct?
 11 A. Uh-huh.
 12 Q. And you found that very traumatic at the
 13 time?
 14 A. Yes.
 15 Q. Okay. Had trouble sleeping, thought your
 16 mother might die, thought she could be taken from
 17 you as well?
 18 A. Yeah.
 19 Q. Okay. And that's part of the same issue
 20 you have about driving or certainly driving on I-95
 21 or an interstate or a toll road, correct?
 22 A. Yeah.
 23 Q. Tell me what a typical day is for you now?
 24 What do you do, excuse me, on a typical day?
 25 A. Go to work.

1 Q. And do you have a regular, excuse me, at
 2 [REDACTED] do you have a regular shift?
 3 A. Yeah. I go in at 8.
 4 Q. Until when?
 5 A. Well, I can leave from 2 to 4. Depends how
 6 busy we are.
 7 Q. All right. Is it your choice or the
 8 managers?
 9 A. Well, I can -- like I said it depends how busy
 10 we are.
 11 Q. So, if it's not busy, you can say I am
 12 leaving?
 13 A. Yeah.
 14 Q. And if it's busy, then they expect you to
 15 say?
 16 A. Yes.
 17 Q. Okay. Which [REDACTED] do you work at? Where
 18 is the location?
 19 A. Lake Worth and Jog.
 20 Q. All right. So, when you're not working,
 21 so you get up, you get up in the morning and take
 22 care of your baby?
 23 A. Yeah, well, I bring him to my mom's so I can
 24 get ready to work because I have, I wake up at 7 and be
 25 at work by 8.

1 stay with her the whole day?
 2 A. Yeah, until I get off.
 3 Q. And then you go and pick him up?
 4 A. Yeah.
 5 Q. And when you go pick him up, then you go
 6 home?
 7 A. Yeah.
 8 Q. Okay. And then what do you do?
 9 A. Make dinner.
 10 Q. All right. And what, watch TV?
 11 A. Yeah. We hang out. He usually watches Elmo
 12 'till --
 13 Q. Your son?
 14 A. Yeah.
 15 Q. All right. And you hang out until you go
 16 to bed around what time?
 17 A. He goes to sleep at like 8. And then we'll
 18 watch some TV and go to sleep.
 19 Q. Okay. [REDACTED] and you are still living
 20 together?
 21 A. Yeah.
 22 Q. Okay. What's [REDACTED] doing now since he got
 23 laid off?
 24 A. Fixing our house.
 25 Q. He is working around the house?

1 Q. Do you feed, feed your son, isn't it?
 2 A. Yeah. Well, he is just now getting -- when I
 3 bring him over there, he is just getting up. So he is
 4 going to take --
 5 Q. Does your mom then feed him?
 6 A. Yes.
 7 Q. Does she work at 7?
 8 A. Yes.
 9 Q. Is she, what -- who does she work for
 10 again?
 11 A. AAffordable Insurance.
 12 Q. Okay. And when she goes to work, does she
 13 work out of the home?
 14 A. No.
 15 Q. And who takes care of your son when --
 16 A. She drops him off at my aunt's house.
 17 Q. And her name is?
 18 A. [REDACTED]
 19 Q. Can you spell it for me?
 20 A. [REDACTED]
 21 Q. Where does she live?
 22 A. [REDACTED]
 23 Q. In Lake Worth?
 24 A. Greenacres.
 25 Q. All right. And then does, does the son

1 A. Uh-huh.
 2 Q. Yes?
 3 A. Yes.
 4 Q. Is he looking for other work as well?
 5 A. Well, yeah, in between trying to deal with his
 6 unemployment.
 7 Q. Okay. So, he is trying to get his
 8 unemployment benefits, correct?
 9 A. Yes.
 10 Q. And then working on the house?
 11 A. Yes.
 12 Q. Has he applied for any other jobs?
 13 A. I think he went to some interviews, yeah, like
 14 the USD Meat.
 15 Q. I'm sorry?
 16 A. The Direct Meat or whatever, the USD Meat or
 17 something.
 18 Q. All right.
 19 A. And some other place on Lake Worth. I didn't
 20 go.
 21 Q. But nobody has at least hired him as of
 22 today's date?
 23 A. No.
 24 Q. Okay. In your answers to the second
 25 interrogatories it appears you have a, you have a

7 (Pages 353 to 356)

[REDACTED] PROSE COURT REPORTING AGENCY, INC. [REDACTED]

1 MySpace since 2008?
 2 A. Yeah.
 3 Q. Okay. Do you use it on a regular basis?
 4 A. Yeah.
 5 Q. And you, you have a Facebook page, but
 6 what you haven't activated it yet?
 7 A. No.
 8 Q. You haven't punched in the profile?
 9 A. Yeah. I haven't -- I think I signed up for it
 10 but I never went on it. I don't know how to use it.
 11 Q. And you actively use your MySpace?
 12 A. Yeah.
 13 Q. And do you use that every day?
 14 A. Maybe every other day.
 15 Q. All right. And you correspond with your
 16 friends or family?
 17 A. Yeah.
 18 Q. What kind of computer do you have?
 19 A. Well, right now I have a Dell laptop.
 20 Q. Okay. And do you take that with you to
 21 work?
 22 A. No. I have my phone.
 23 Q. Okay. And what kind of phone do you have?
 24 A. iPhone.
 25 Q. And how long have you had an iPhone?

1 like 17.
 2 Q. And you bank -- how long have you been
 3 banking? How long have you had a bank account?
 4 A. Since, yeah, I was like 18.
 5 Q. Did you ever have like a savings account
 6 or something that your parents set up or anyone set
 7 up for you?
 8 A. Well, the bank is me and my mom share the
 9 same.
 10 Q. Do you have the same bank account?
 11 A. Yes. It's a joint bank account.
 12 Q. Is it a checking account?
 13 A. Yeah.
 14 Q. Okay. And why do you and your mom share
 15 the same account?
 16 A. Because she has three accounts with Chase
 17 already, so to add on, it would be easier.
 18 Q. Okay. So, she has her, two of her own
 19 accounts and then she has an account with you?
 20 A. Yes. She --
 21 Q. And you said -- I'm sorry.
 22 A. She added my account to hers.
 23 Q. You can use that account. It's basically
 24 your account. It just happens to be in both your
 25 names?

1 A. Since November of last year.
 2 Q. Okay. So, you're on an AT&T plan?
 3 A. Yeah.
 4 Q. And the iPhone, is that, are you and [REDACTED]
 5 on the same program or the same plan?
 6 A. No.
 7 Q. Okay. And do you pay for your own plan?
 8 A. Yeah. Well, I share a plan with my dad. It's
 9 a family plan.
 10 Q. How much does that cost you a month?
 11 A. One hundred bucks.
 12 Q. And your laptop, did you buy -- how old a
 13 laptop is it?
 14 A. The laptop I bought in January of this year.
 15 I'm making payments on it.
 16 Q. Do you have credit cards?
 17 A. Yeah.
 18 Q. Okay. Which credit cards do you have? I
 19 am not going to ask you for numbers but what credit
 20 cards do you have?
 21 A. I got Capital One, Wal-Mart and that's it, and
 22 I have a bank card.
 23 Q. How long have you had credit cards,
 24 Ms. Doe No. 6?
 25 A. My dad got me my first credit card when I was

1 A. Yeah.
 2 Q. I may have asked this before, so I
 3 apologize if I am repeating: Have you ever talked
 4 with [REDACTED]; that is, is she aware that
 5 you're a Plaintiff in a lawsuit?
 6 A. (Witness shakes head.)
 7 THE COURT REPORTER: Is that --
 8 BY MR. CRITTON:
 9 Q. No?
 10 A. No.
 11 Q. You also listed [REDACTED]
 12 [REDACTED], as one of your closest friends over
 13 the last four or five years. Is she aware you are a
 14 Plaintiff in a lawsuit?
 15 A. Yeah, she knows something about it.
 16 Q. Okay. And how does she know about it?
 17 A. Because last time I came here, I told her that
 18 I had to, what I had to do.
 19 Q. Okay. And what, I mean that you had to
 20 testify?
 21 A. That I had to --
 22 Q. That I was asking you questions?
 23 A. -- go downtown with my lawyer. And I
 24 explained to her that I was in a lawsuit and that I
 25 would tell her about it later.

1 Q. So, she doesn't know anything about why
 2 you're in a lawsuit?
 3 A. No.
 4 Q. Have you, have you ever been in a lawsuit,
 5 other than this lawsuit have you ever been in a
 6 lawsuit for anything before?
 7 A. No.
 8 Q. Was your mom involved in a lawsuit when
 9 they had that automobile accident with the semi?
 10 A. No.
 11 Q. Did that turn into a lawsuit?
 12 A. No.
 13 MR. HOROWITZ: Form.
 14 BY MR. CRITTON:
 15 Q. Was a claim filed or do you know?
 16 A. No, no.
 17 Q. Your mom never filed anything?
 18 A. No.
 19 MR. HOROWITZ: Form.
 20 BY MR. CRITTON:
 21 Q. Was the car repaired?
 22 A. No.
 23 Q. Was it drivable?
 24 A. No.
 25 Q. What happened to it?

1 drives around, too. I mean, I hang out with my son most
 2 of the time, yeah.
 3 BY MR. CRITTON:
 4 Q. Does [REDACTED] do things with you and your
 5 son, too?
 6 A. Yeah.
 7 Q. Okay. So, he is a pretty active father?
 8 A. Yeah.
 9 Q. All right. Was there a time -- well, let
 10 me strike that. You, you've testified that you went
 11 to Mr. Epstein's home on one occasion, August 8th of
 12 '04, correct?
 13 A. Yeah, that was one time.
 14 Q. Prior to the time that you were at
 15 Mr. Epstein's home, I want to talk a little bit
 16 about some background that you, that you provided or
 17 that I provided at least to your attorney with
 18 regard to issues that you had with, issues that you
 19 had with police or law enforcement. Okay.
 20 Have you had a chance to look at a bunch
 21 of police reports?
 22 A. No.
 23 Q. Have you looked at any police reports?
 24 MR. HOROWITZ: Form.
 25 THE WITNESS: About who?

1 A. It was junked.
 2 Q. Okay. And how do you know that she didn't
 3 file a lawsuit?
 4 A. Because she didn't, because I know she didn't.
 5 She was filing for bankruptcy.
 6 Q. Your mom was at the time?
 7 A. She just filed for bankruptcy in 2000 or 2002
 8 or something like that. It was like six, seven years
 9 ago. But, yeah, she was filing for bankruptcy. The car
 10 was junked. The tires blew. It wasn't nobody's fault.
 11 That's what they said.
 12 Q. Okay. A typical day that you told me
 13 about going to work, take your son to your mom's and
 14 then son goes to your aunts. You work, pick up son,
 15 you watch a little TV, get dinner ready, talk, I
 16 assume, with [REDACTED] and you guys go to bed; is that
 17 pretty much what you've been doing the last couple
 18 of years?
 19 MR. HOROWITZ: Form.
 20 BY MR. CRITTON:
 21 Q. Since your son's has been born?
 22 A. No. I mean, we take him, we went to the zoo
 23 last week with [REDACTED] daughter, his wife. I take him
 24 around the neighborhood sometimes in his little wagon,
 25 his little car, his little Power Wheels car that he

1 BY MR. CRITTON:
 2 Q. About anything?
 3 MR. HOROWITZ: Form.
 4 THE WITNESS: About my case when I was on
 5 house arrest?
 6 BY MR. CRITTON:
 7 Q. Okay. Have you looked at some of those?
 8 A. Not recently.
 9 Q. Okay. When you say not recently, did you
 10 look at it before you were deposed in February?
 11 Before I, we started your deposition in February,
 12 did you have a chance to look at that?
 13 A. No.
 14 Q. Okay. Do you remember an incident that at
 15 least you were involved in where you were followed
 16 into the woods and, by a number of girls and were
 17 attacked and threatened back in August of '03?
 18 MR. HOROWITZ: Form.
 19 THE WITNESS: I was followed into the
 20 woods?
 21 MR. CRITTON: Right.
 22 THE WITNESS: Was that at school?
 23 BY MR. CRITTON:
 24 Q. Apparently you were on your way home from
 25 middle school. Do you remember that?

1 A. Yeah.
 2 Q. All right. And what happened, what
 3 occurred on that occasion?
 4 A. Nothing. They pushed me around and was just
 5 talking and that's it, and we didn't even fight.
 6 Q. Okay. Then why, why did you report it?
 7 The only way, I assume the people who came after you
 8 wouldn't have called the police to report that they
 9 attacked you?
 10 A. The school police.
 11 MR. HOROWITZ: Form. Wait for his
 12 question.
 13 BY MR. CRITTON:
 14 Q. Let me finish my question. I, I assume
 15 that the girls who attacked you wouldn't have called
 16 the police. So, how was it that the Palm Beach
 17 Sheriff's office became involved in August of '03 --
 18 MR. HOROWITZ: Form.
 19 BY MR. CRITTON:
 20 Q. -- as a result of that incident?
 21 MR. HOROWITZ: Form.
 22 THE WITNESS: Because the reason the fight
 23 broke, got broken up, because there is a school
 24 police and Dr. [REDACTED] (phonetic) that would
 25 drive around on the golf course or on the golf

1 finish doing my laundry, and there was some guy
 2 in my drier looking through my clothes, and he
 3 turned around he had my drawers in his mouth.
 4 BY MR. CRITTON:
 5 Q. Your underwear?
 6 A. Yes.
 7 Q. And what did you do? Did you scream?
 8 A. Nothing. I went back inside.
 9 Q. Did you yell?
 10 A. Yeah. I went back inside and I told my
 11 parents, and they came outside and he was gone.
 12 Q. Did they find the person?
 13 A. They all went looking for him. I don't think
 14 so.
 15 Q. Did the police come?
 16 A. I don't remember.
 17 Q. Okay. I asked you to assume that there
 18 is -- do you remember --
 19 A. Yeah.
 20 Q. -- looking at a police report about it?
 21 A. No. I didn't ever look at the police report.
 22 If you got one, I assume there was one made.
 23 Q. All right. And did the police come and
 24 interview you at all?
 25 A. I don't know. I was 13.

1 cart and watch all the kids walk home.
 2 So, they heard about what's happening,
 3 because we're what, 13, 12 years old, a bunch
 4 of little middle school kids. They were all
 5 loud, so the school police made a report.
 6 I don't even remember that. I don't
 7 remember talking to no cops or nothing. I
 8 remember walking home, going to Wendy's and
 9 getting picked up.
 10 BY MR. CRITTON:
 11 Q. Okay. And who picked you up?
 12 A. My mom like always.
 13 Q. All right. Do you remember another
 14 instance in '03 where you went into a shed and there
 15 was a, I guess you were doing your laundry and there
 16 was some man in the shed?
 17 A. Yeah.
 18 Q. Okay. And I would ask you to assume that
 19 at least the police report reflects that it was on
 20 February, I'm sorry, [REDACTED]. Tell me what
 21 you remember about that incident.
 22 A. I went --
 23 MR. HOROWITZ: Asked and answered, but go
 24 ahead.
 25 THE WITNESS: I went to the shed to go

1 Q. You can answer yes or no. Again --
 2 A. I don't remember.
 3 MR. HOROWITZ: Just say --
 4 MR. CRITTON: Let me just --
 5 MR. HOROWITZ: There you go.
 6 MR. CRITTON: I don't know what you
 7 remember or what you don't remember. And
 8 therefore, when I'm asking you a question,
 9 don't get upset at me because I wasn't there at
 10 the time. Do you understand that?
 11 THE WITNESS: Yeah.
 12 MR. CRITTON: All right. So, if I am
 13 asking a question, it's because I don't know
 14 what the answer is most of the time. All
 15 right?
 16 THE WITNESS: Yeah.
 17 BY MR. CRITTON:
 18 Q. So, you don't remember talking to the
 19 police at all, is that correct?
 20 A. No, I don't remember.
 21 Q. Okay. Do you remember an incident in, an
 22 incident in November of 2003 between yourself and
 23 [REDACTED] (phonetic)? Do you remember a person
 24 named [REDACTED]?
 25 A. What happened? I don't --

1 MR. HOROWITZ: Bob, can you share that one
2 with me. I am not sure that --

3 MR. CRITTON: I sent you everything.

4 MR. HOROWITZ: No. I understand, but can
5 you --

6 MR. CRITTON: Unfortunately, I have
7 written all over all of these.

8 MR. HOROWITZ: Okay.

9 BY MR. CRITTON:

10 Q. This is -- it happened, apparently you
11 were struck in the eye by Ms. [REDACTED]. You were
12 talking with her boyfriend, and you-all, the two of
13 you started fighting. Does that ring a bell with
14 you at all?

15 MR. HOROWITZ: Form.

16 THE WITNESS: Yeah. Man, girls. She
17 thought I was talking to her boyfriend, and she
18 came and confronted me about it and started
19 trying to fight with me so.

20 BY MR. CRITTON:

21 Q. Again, the Palm Beach Police were called
22 again.

23 A. Yes.

24 Q. So, did you have to give a statement to
25 the police?

1 trust?

2 A. I don't -- what do you mean by that?

3 Q. Well, would you, would you, if you had a
4 problem, if you had an issue, would you call that
5 you thought you needed to talk to the police, the
6 police is someone that you felt that you could call,
7 dial 911 and tell them if you had a problem or
8 somebody had done something to you that you thought
9 was wrong or illegal or inappropriate?

10 A. If I had an emergency, I would call 911.
11 That's all. That doesn't make any sense.

12 Q. All right. Well, did you feel like you
13 could tell the police what had happened in at least
14 each of these three instances, and they could
15 evaluate whether what you were saying was true or
16 not?

17 MR. HOROWITZ: Form.

18 THE WITNESS: In two of those incidence,
19 or I know one of them. I didn't talk to the
20 police. Do you have any daughters? I mean,
21 like, come on. Girls get into fights all the
22 time because other girls are talking about them
23 and it's middle school.

24 BY MR. CRITTON:

25 Q. All right. So, it's pretty common for

1 A. Yeah.

2 Q. All right. And did they take any action
3 at that time?

4 MR. HOROWITZ: Form.

5 THE WITNESS: I don't know. They were
6 saying that they were going to press charges on
7 me.

8 BY MR. CRITTON:

9 Q. Were any charges ever pressed?

10 A. I don't think so.

11 Q. Okay. So, at least, I mean we've talked
12 about, these may not be all of them but an incident
13 in August of '03, another incident in March of '03,
14 third incident now in November of '03. Are those,
15 at least in those three instances, the police were
16 called so you had to deal with the police. Correct?

17 MR. HOROWITZ: Form.

18 THE WITNESS: Yeah.

19 BY MR. CRITTON:

20 Q. All right. And you knew, did you consider
21 the police to be your friends at that time?

22 A. No.

23 Q. Did you consider the police to be bad?

24 A. No.

25 Q. Someone that you would trust or wouldn't

1 middle school girls to get in fistfights?

2 A. Yeah.

3 Q. All right. And that's certainly been your
4 experience?

5 A. I mean, all, you don't watch the news like
6 there was girls that took a girl in the house and, like,
7 beat, there were like three of them that beat her up
8 inside the house. I mean, like, come on. The girls do
9 it all the time. It's not like, it's not -- it wasn't a
10 big deal. I don't see why you're making a big deal out
11 of it. Girls will be girls. They cat fight.

12 Q. All right. And so at least in your
13 experience when you were in middle school pretty
14 common for girls to get into fights and have yelling
15 matches or fistfights with each other and then the
16 next day or a few days later they are friends again?

17 A. Yeah. Exactly.

18 Q. Okay.

19 A. Exactly how it goes.

20 Q. When you were in middle school did you
21 get, did you get to make choices about classes that
22 you were going to take?

23 A. No.

24 Q. You had to go to certain classes?

25 A. Yeah.

1 Q. It was all a structure?
 2 A. Yeah.
 3 Q. All right. And then as to, in terms of
 4 your attendance at school, did you consider
 5 yourself, did you attend on a pretty regular basis
 6 or were you pretty truant? If I say, if I use the
 7 word truant, does that mean anything to you?
 8 A. Like --
 9 Q. You don't go to school.
 10 A. Yeah.
 11 Q. That is you skip school. Somebody who
 12 skips school would be considered truant.
 13 A. Yes. I did that a lot.
 14 Q. And, and did you do that during middle
 15 school?
 16 A. That's the only school I went to. I didn't go
 17 to high school.
 18 Q. That's right. So, by the time you, you
 19 were in middle -- or because you didn't go to high
 20 school, in middle school when you skipped school,
 21 how often would you skip -- let me start again.
 22 That was an awful question.
 23 How often would you skip school when you
 24 were in middle school?
 25 A. I don't know.

1 Q. Right?
 2 A. Yeah. That's what skipping school is.
 3 Q. All right. And if you had skipped, if you
 4 had skipped school, you had to make a decision,
 5 right? You had a choice to either, I am going to go
 6 to school today or I am not going to go to school.
 7 A. Not really. It was a group of kids, either
 8 they were skipping -- I wasn't skipping by myself. It
 9 wasn't like I was, hum, maybe I just don't want to go to
 10 school and I am going to go sit in this bush by myself.
 11 It wasn't like that.
 12 Q. You didn't have to sit in a bush. I mean,
 13 you can --
 14 A. I mean, where else was I going to go? I
 15 wasn't going to go home.
 16 Q. Why not, if your mom wasn't there?
 17 A. She comes home for lunch.
 18 Q. Okay. So, you knew she came for lunch and
 19 if you skipped --
 20 A. Yeah.
 21 Q. Let me finish the question. So, you knew
 22 during middle school, 2002, 2003, that if you
 23 skipped school and you stayed home, mom, you would
 24 see mom at lunchtime. So you couldn't obviously
 25 stay there, right?

1 Q. A third of the time, a half of the time?
 2 A. I don't know.
 3 Q. Once in a while, once a week?
 4 A. Maybe like once a week, once in a while. I
 5 don't know. I don't remember.
 6 Q. And if you were going to skip school would
 7 you go off to school and then just; that is, your
 8 mom or your, you know, whoever you were living --
 9 who were you living with at that time, your mom?
 10 A. My mom.
 11 Q. Okay. Your mom was going to work?
 12 A. Yes.
 13 Q. She'd go to work and she would send you
 14 off to school?
 15 A. Yeah.
 16 Q. Okay. Except sometimes you wouldn't go?
 17 A. Yeah.
 18 Q. All right. If you didn't go would you
 19 stay home?
 20 A. No.
 21 Q. Where would you go?
 22 A. To whoever I was skipping with.
 23 Q. And if you, if you skipped school, you
 24 knew that you were supposed to be at school, right?
 25 A. Yeah.

1 A. Yeah.
 2 Q. And in terms of whether you were going to
 3 skip school or not, and would you coordinate that
 4 with your friends or would you get to school and a
 5 bunch of people would just say, hey, lets not go
 6 today?
 7 A. Yeah, that's how skipping school works.
 8 Q. And so, but it would be your choice?
 9 A. I guess, yeah.
 10 Q. That is, and you would have to make a
 11 voluntary decision, I am either going to go to
 12 school today or I am not going to go to school,
 13 right?
 14 A. Yeah, pretty much.
 15 Q. All right. And if you didn't go to
 16 school, you know that that was wrong because you
 17 were supposed to be in school, right?
 18 A. Yeah, I guess.
 19 Q. Do you remember in May of 2000, May 20th
 20 of 2004 that you were punched in the head, a friend
 21 punched you in the forehead with a closed fist.
 22 Again another police report was filed. Do you
 23 remember that?
 24 A. No, I don't remember that.
 25 Q. But it would be consistent kind of with

1 what had happened in the past?
2 A. I don't even remember what you're talking
3 about.

4 Q. Well, see if this refreshes your
5 recollection is that it was -- your mother's name is
6 how do you say that, [REDACTED]

7 A. [REDACTED]
8 Q. [REDACTED] called the police. She
9 advised that her daughter had a verbal argument with
10 a friend for some unknown reason and the friend's,
11 the friend had punched you in the forehead with her
12 fist. Okay.

13 The person apparently lived in Tavares
14 Cove mobile home. Grabbed you by the arm, hit you
15 with a closed fist. Again, just kind of a routine
16 event for you in middle school during that time?

17 A. I don't -- is there like a name of the person?
18 I don't.

19 Q. No. They have them blacked out.

20 A. See my mom called. I mean, like, she's my
21 mom.

22 Q. All right. But you don't remember
23 anything about that?

24 A. No.

25 Q. Okay. Do you remember in April of 2005,

1 he is 24 and I am 19, like, we don't like the same
2 stuff. We just don't get along. It's just brother and
3 sister.

4 Q. All right. Well, every time that, is it
5 your testimony that every time there was a fight
6 between a brother and a sister in the neighborhood,
7 the police would show up and fill out a report?

8 A. There has been a lot less that they have shown
9 up for.

10 Q. If you thought you had a problem that you
11 needed to discuss with the police or something
12 illegal had happened or inappropriate happened, at
13 least the police were in your neighborhood enough
14 that you could call the police or talk to the police
15 and report it to them, right?

16 MR. HOROWITZ: Form.

17 MR. CRITTON: Based on what you told me.

18 THE WITNESS: I wouldn't walk up to them
19 and start talking to them, no.

20 BY MR. CRITTON:

21 Q. Why not? If you thought someone had done
22 something inappropriate to you or illegal or
23 improper, you could certainly if the police were in
24 your neighborhood as often as you indicated back in
25 the 2003, 2004 time period, you could have gone to

1 [REDACTED] you and your brother got into a
2 fight and the police were called?

3 A. He's my brother. Oh, my God.

4 MR. HOROWITZ: Form.

5 MR. CRITTON: Well, again, there's,
6 there's a distinction. There is -- kids fight
7 all the time.

8 THE WITNESS: Do you have any other police
9 reports about whole neighborhood. I mean the
10 cops are always in my neighborhood. They like
11 live there. So, I mean, like they are like
12 there. So, when something happens, they rush
13 over.

14 BY MR. CRITTON:

15 Q. All right. So, at least as you were
16 growing up the police were in your neighborhood as
17 a, on a regular basis?

18 A. Yeah.

19 Q. So, at least in the instance where you're,
20 they came to your house because you and your
21 brother, because you and your brother were having a
22 fight, that was just again kind of a normal
23 occurrence in the neighborhood for you?

24 A. Not in the neighborhood. I don't -- he is my
25 brother. We don't get along. He is 23 and I am -- or

1 the police and told them, true?

2 A. If you read on all those police reports, they
3 were there because of me. So, I'm not going to walk up
4 to them and be like, hey, I got a problem.

5 Q. Why not?

6 A. Because they are obviously there for something
7 that one of us did, so I am not going to walk over there
8 and start talking to them.

9 Q. Well, why? If you thought that somebody
10 had done something to you, why would you not feel
11 comfortable enough to go up to the police and tell
12 them what happened if you thought it was a
13 significant event?

14 A. Do you just want me to walk up to some random
15 cruiser and knock on the window and start talking to
16 them? Why don't you try that and tell me how it goes.
17 They are going to tell you call 911, call the
18 nonemergency number, call them, and they will call me.
19 That's exactly what they are going to tell you.

20 Q. Okay.

21 A. They are not going to talk to you. They are
22 not going to have a full blown Dr. Phil conversation
23 with you.

24 Q. And so from your perspective, if you
25 really wanted the police, if you wanted to report

1 something that you thought had occurred illegal,
2 illegally to you or some, someone had done something
3 inappropriate with you, you had certainly the
4 knowledge back in 2002, 2003, 2004, 2005 to call 911
5 and report it, true?

6 MR. HOROWITZ: Form.

7 THE WITNESS: I have known to call 911
8 since I was like six years old.

9 BY MR. CRITTON:

10 Q. All right.

11 A. So --

12 Q. So, the answer to my question is, yes?

13 A. Yeah.

14 MR. HOROWITZ: Form.

15 BY MR. CRITTON:

16 Q. Do you remember when the police were
17 called in June of 2000 -- June 25th of 2005, because
18 you threw a rock at a car window at one of your
19 friends and broke it? Do you remember that?

20 A. Yeah. We were playing around and I paid for
21 that window.

22 Q. Well, the police were called?

23 A. No, I didn't, I didn't know the police were
24 called. I know that it was the -- we were all sitting
25 at the office with the manager and everybody. It's her

1 couple, but the police again were called. There was
2 apparently a fight between your mother, between your
3 father about something silly like a bag of chips and
4 yourself, and your mother stepped in front of you
5 and got hit by your father instead?

6 MR. HOROWITZ: Form.

7 BY MR. CRITTON:

8 Q. Do you remember that event?

9 A. No.

10 Q. Do you deny it happening or you just don't
11 remember it?

12 A. No. My parents never hit me or never hit my
13 brother. No, I don't. I couldn't even believe that if
14 you tried to tell me that happened, no.

15 Q. Let's see if this refreshes your
16 recollection, is on the [REDACTED], the
17 police, the Palm Beach Sheriff's Office came to your
18 house. The mother and father were fighting. Your
19 father reportedly was drunk and was yelling at the
20 mother about a bag of chips being left on the
21 counter.

22 You started to yell or you were yelling at
23 your father telling him to stop yelling at your
24 mother. And he got in your face and went into your
25 room, got in your face, yelled at you and attempted

1 son. And we were all playing around throwing stuff at
2 each other, and I threw a rock and it just tapped his
3 window and it shattered.

4 Q. The rock just tapped the window?

5 A. Yeah.

6 Q. And what, a windshield of a car shattered?

7 A. No, it was the side window.

8 Q. Side window in the trailer?

9 A. No, in a car.

10 Q. Oh, that's what I thought you said. So,
11 it's not the windshield. It was the side window in
12 a car?

13 A. Yeah.

14 Q. And you threw a rock?

15 A. Yeah.

16 Q. Just tapped it?

17 A. We were playing around all throwing stuff at
18 each other. I guess it just tapped the window and the
19 whole thing spidered. If that's -- that's the only
20 knowledge that I know of breaking a window, because I've
21 never done nothing to nobody's car. If you look I have
22 never touched nobody's house or car or nothing. I am
23 not that type of person.

24 Q. Do you remember in July, on July 20th of
25 '06 police again were called. I am skipping a

1 to hit you, but the mother stepped in between you
2 and your father. Do you remember that?

3 MR. HOROWITZ: Form.

4 THE WITNESS: No.

5 BY MR. CRITTON:

6 Q. Okay. You're not saying it didn't happen.
7 You just have no recollection of it?

8 A. No, I am saying it didn't happen because --
9 did that -- is that like a police report? How would
10 they know what happened in my house. We didn't come out
11 and say anything because I know my mom and I know my
12 dad, and you are tripping. No, there is no way. I
13 don't know --

14 Q. How am, how I tripping?

15 A. Because that's ridiculous. My dad never hit
16 me or my brother.

17 Q. How about your mom?

18 A. Never. I am telling you never.

19 Q. So, if there is a police report on this
20 you think someone just created it, made it up?

21 MR. HOROWITZ: Form.

22 THE WITNESS: No. I think that they have
23 the wrong story because that's not what
24 happened. I know my dad is a drunk, but he
25 always fell asleep before anything. My dad is

1 not, no.
 2 BY MR. CRITTON:
 3 Q. All right. And the other ones we've
 4 covered. Has DCF ever been to your home, Department
 5 of Children and Family Services?
 6 A. Yeah.
 7 Q. On how many occasions?
 8 MR. HOROWITZ: Form.
 9 THE WITNESS: I don't remember. I
 10 remember one time when I got out of my program.
 11 BY MR. CRITTON:
 12 Q. Which program had you gotten out of?
 13 A. Growing Together.
 14 Q. How many different programs have you been
 15 in for -- well, what would you have considered
 16 Growing Together, what kind of a program?
 17 A. It was a behavioral and drug program.
 18 Q. How many different programs have you been
 19 in?
 20 A. None. Just that one.
 21 Q. Have you ever been in [REDACTED] [REDACTED] ?
 22 A. Yeah. We talked about that last time.
 23 Q. That's when were you Baker Acted?
 24 A. Yeah.
 25 Q. How long were you at Growing Together?

1 Q. Have you ever been to Data?
 2 A. No.
 3 MR. HOROWITZ: Asked and answered.
 4 BY MR. CRITTON:
 5 Q. With regard to Growing Together, I think
 6 you said you were in there a month or two. The
 7 records reflect sometime in April of 2006. Tell me
 8 how you came to be in Growing Together.
 9 MR. HOROWITZ: Form.
 10 THE WITNESS: I don't know. My mom
 11 brought me there.
 12 BY MR. CRITTON:
 13 Q. Okay. Well, what did she tell you?
 14 A. I don't remember. It was a doctor's
 15 appointment or something. She tried to tell me
 16 something dumb, and we went in there and they tried --
 17 and they locked me in. I was stuck there.
 18 Q. Okay. As of 2006, you would have been 15
 19 years old, right, April of 2006?
 20 A. Yeah.
 21 Q. And how did your mom get you to go there?
 22 A. She told me we were going to like a doctor's
 23 appointment or something, and I have never been to -- it
 24 was like in Riviera. I have never been out there so I
 25 didn't know. We just walked in and they kept me there.

1 A. Like a month, month or two. I don't remember.
 2 Q. And who put you into Growing Together?
 3 A. My mom.
 4 Q. Do you remember the time period you were
 5 in there?
 6 A. No.
 7 Q. Okay. If I was to mention 2006, would
 8 that meet approximately with your recollection?
 9 A. I guess. I don't know. I know it was like
 10 March or that's when I went in. It was like March.
 11 Q. Did you know anyone else in the program at
 12 the time?
 13 A. No.
 14 Q. And is Growing Together, I think you said
 15 Growing Together has been the only program you have
 16 ever been in, correct?
 17 MR. HOROWITZ: Form.
 18 THE WITNESS: Yeah.
 19 BY MR. CRITTON:
 20 Q. Did you ever go to Carp?
 21 A. No.
 22 MR. HOROWITZ: Asked and answered.
 23 BY MR. CRITTON:
 24 Q. Do you know what Carp is?
 25 A. Yeah.

1 Q. Okay. And when you walked in, what
 2 happened? Tell me.
 3 A. Nothing. We went into this room and I sat
 4 there and they were like, well, you're staying here,
 5 your mom is not taking you. They started explaining to
 6 me.
 7 Q. Okay. And you say "they" how many people
 8 were there?
 9 A. Like two.
 10 Q. A man, woman?
 11 A. There was a man and a woman.
 12 Q. And at that particular time what behavior
 13 drug problems did you, were you having?
 14 MR. HOROWITZ: Form, form.
 15 THE WITNESS: I was on [REDACTED].
 16 BY MR. CRITTON:
 17 Q. Still smoking pot on a regular basis?
 18 A. Yeah. I guess that's why I went.
 19 Q. I'm sorry?
 20 A. I guess that's why they sent me there.
 21 Q. Well, I am asking.
 22 A. I don't know. I don't sign myself up.
 23 Q. All right. Because you, probably if your
 24 mom had said I am taking you to a behavioral and/or,
 25 and a drug rehab place, you would have said no way?

1 A. No. Yeah.
 2 Q. All right. So, when you got there, did
 3 your mom pick up and leave right away or did she sit
 4 through a couple of hours with you?
 5 A. No, she left.
 6 Q. So, she took you in. She introduced you
 7 to the people. Sat you down in a room and said bye?
 8 A. No. She -- they sat me down in the room and
 9 they closed the door in, like behind me. So, she
 10 wouldn't be able -- I wouldn't be able to see her leave
 11 or nothing like that.
 12 I don't know what she did afterwards. She
 13 might have went and talked to them. I don't know.
 14 There was already people in the room waiting for me.
 15 Q. And what did you have with you, just the
 16 clothes that were on your back and your purse?
 17 A. They brought my stuff already. They had, they
 18 had it set up.
 19 Q. Who is "they," your mom?
 20 A. My mom and, yeah, the people.
 21 Q. Who else other than your mom got you to
 22 that place? Did you ever ask her afterwards?
 23 A. No, it wasn't my dad because my dad got me
 24 out.
 25 Q. Your dad was the one that sprung you from

1 regular, no box strings just mattresses, blanket and a
 2 pillow and nothing in the room, no drawers, no lamps, no
 3 nothing, and the door is locked behind us.
 4 Q. Okay. Would that be every night?
 5 A. Yep.
 6 Q. Would you go to a different house every
 7 night or would you be at a house for like a week at
 8 a time?
 9 A. Different house every day.
 10 Q. Different house every day. Was it the
 11 same for, I assume you were with three other girls?
 12 A. Two other girls including myself.
 13 Q. Okay. So, there were three of you and you
 14 would move from house to house for about seven or
 15 eight weeks?
 16 A. Well, they, yeah, they were still in there
 17 when I left. That's how the program works.
 18 Q. And you sleep there at night?
 19 A. Yes.
 20 Q. And what do you do during the day?
 21 A. We go back to the program.
 22 Q. The program back in Riviera Beach?
 23 A. Yes.
 24 Q. Okay. And what time does the program
 25 start, did the program start in the morning?

1 the place?
 2 A. No. Well, my dad went -- he seen me in
 3 [redacted] and he told her that he, that I was not going
 4 back over there.
 5 Q. How, from -- let me strike that. Were you
 6 in Growing Together before you got to [redacted]?
 7 A. Yeah.
 8 Q. And you were in Growing Together for a
 9 month or two until you went to [redacted]?
 10 A. Yeah. They, from Going Together I went
 11 straight to [redacted]. They brought me to [redacted].
 12 Q. At the time so during the month or two
 13 that you were at Growing Together, tell me how were
 14 you, what was the, what were your accommodations?
 15 A. What do you mean accommodations?
 16 Q. I'm sorry. Where did you stay? Was it
 17 like a bunk-bed?
 18 A. No.
 19 Q. Did you have your own room? Was it like a
 20 big room that had a bunch of beds in it?
 21 A. No. They, we went to the parents like the
 22 parents that put their kids in there, they volunteer
 23 their homes and stuff like that. So, we would go to
 24 different houses. They would have an empty room with
 25 four beds, four beds, no mattress or mattresses -- just

1 A. Well, we got up at like 5:30, 6:00. We had to
 2 be there by 7 because some of the houses were like Port
 3 St. Lucie or Boca. They were, you know, kind of far.
 4 Q. Okay. So, and who would transport you
 5 back to the place?
 6 A. The parents, the parents that we were staying
 7 at their house at night.
 8 Q. And did you, were the, did you understand
 9 the parents themselves had kids in the program but
 10 were staying at other locations?
 11 A. Yes.
 12 Q. And did you, did the parents feed you at
 13 night?
 14 A. Yeah.
 15 Q. Okay. So, would they feed you in the
 16 morning?
 17 A. We, they would tell us there was cereal in the
 18 cabinet.
 19 Q. Okay. So, they'd get you up at 5:30. You
 20 would eat and then they would transport you to
 21 Riviera Beach and then you would stay there until
 22 what time?
 23 A. Sometimes 7, 8:00.
 24 Q. And then you would be picked up again and
 25 taken back to the next house?

1 A. Yes.
 2 Q. Did you ever stay in the same house more
 3 then once?
 4 A. Yes.
 5 Q. So, you might stay there for two or three
 6 days or a week?
 7 A. No. We would stay there once and then go
 8 there maybe next or the week after and go back to the
 9 same house.
 10 Q. What was the idea of moving you from house
 11 to house?
 12 MR. HOROWITZ: Form.
 13 THE WITNESS: I don't know.
 14 BY MR. CRITTON:
 15 Q. Did you ever ask?
 16 A. No.
 17 Q. Did the program, did they have you doing
 18 things during the day or was it more of a lecture to
 19 you?
 20 A. Well, they would read us the AA book or the NA
 21 book. We would go to school at 9. We would eat lunch,
 22 go back to school, do some more reading or they would
 23 sing songs or whatever and eat dinner.
 24 Q. Okay. When you were at Growing Together
 25 and you were 15 and a half probably at that time in

1 MR. HOROWITZ: Form.
 2 THE WITNESS: Yes.
 3 MR. CRITTON: I'm sorry?
 4 THE WITNESS: Yes.
 5 BY MR. CRITTON:
 6 Q. So, when you, when you were at Growing
 7 Together, they were putting you in school but you
 8 really didn't want to be there because you had
 9 already dropped out of school?
 10 A. No, I had to go to school.
 11 Q. That was part of the program?
 12 A. Yes.
 13 Q. Well, I understand that. But from your
 14 choice, if you had had your choice, you wouldn't
 15 have gone to school because you had previously
 16 dropped out of school, right?
 17 A. I didn't have nothing else to do.
 18 Q. Because you were trapped in the program?
 19 A. Yes.
 20 Q. All right. Did, did the program get you
 21 off of whatever drugs you were on during that six or
 22 seven weeks or eight weeks you were there?
 23 A. I started using again afterwards but...
 24 Q. Were you able to get drugs during the time
 25 you were there?

1 April of '06, because I think your birthday is in
 2 September --
 3 A. Yes.
 4 Q. -- were you still in school at the time
 5 before your mom put you there or had you left
 6 school? Probably --
 7 A. I'm not really sure.
 8 Q. Well, if you were 16 or almost 16, at 15
 9 you would have been past middle school, wouldn't
 10 you?
 11 A. No. I failed sixth grade. I failed seventh
 12 grade. Yeah, I failed a lot, so...
 13 Q. Is that because you didn't try?
 14 A. No, I mean --
 15 Q. Just didn't like school?
 16 A. When I went to school I got good grades but I
 17 just didn't go. I got zeros.
 18 Q. Got zeros. Okay. So, when you actually
 19 went to school you got good grades, correct?
 20 A. Yes.
 21 Q. But you got zero's because you missed,
 22 skipped so much school?
 23 A. Yes.
 24 Q. So, you were smart enough to do the work
 25 but you just choose not to do it?

1 A. No.
 2 Q. So, as soon as you got out of the
 3 program -- and let's see you went from Growing
 4 Together and then you went to [REDACTED]; is that
 5 right?
 6 A. Yeah.
 7 Q. Did you think the program helped you at
 8 all?
 9 A. No.
 10 Q. Let me show you what I will mark as --
 11 MR. CRITTON: Do you know what exhibit?
 12 THE COURT REPORTER: This is the first one
 13 for this one.
 14 MR. CRITTON: For today. I know that.
 15 MR. HOROWITZ: I'll look it up.
 16 MR. CRITTON: Let's go off the record for
 17 a minute.
 18 THE VIDEOGRAPHER: Off the record at 11:10
 19 [REDACTED].
 20 (Defendant's Exhibit No. 4 was marked for
 21 identification.)
 22 (A discussion was held off the record.)
 23 THE VIDEOGRAPHER: We're back on at
 24 11:22 [REDACTED].
 25

1 BY MR. CRITTON:
 2 Q. Ms. Doe No. 6, have you had a chance to
 3 look at Exhibit No. 4?
 4 A. Yes.
 5 Q. It appears it be a letter that was written
 6 by your mother November 29th, 2006, to Dear Sir
 7 and/or Madam, someone at Growing Together. Do you
 8 see that?
 9 A. Yes.
 10 Q. Have you ever seen this letter before?
 11 A. No.
 12 Q. Okay. The letter reflects that at least
 13 based on what your mother said is that you were put
 14 in, or she took you to -- you were 15 years old, you
 15 were a 15-year-old person, female at the time that
 16 you went to Growing Together and you went in on
 17 March 10th 2006. Does that meet with your
 18 recollection?
 19 A. Yeah.
 20 Q. I'm sorry?
 21 A. Yes.
 22 Q. It says that at least your mother's
 23 perspective was that you had a problem with use of
 24 drugs and your diagnosis with posttraumatic stress
 25 disorder. Would you agree with that?

1 therapists and programs, she didn't have a good
 2 grasp of what your problems were?
 3 A. No.
 4 Q. During the 2003, 2004, 2005, 2006 time
 5 period, what did you think your problems were?
 6 A. Didn't think I had a problem.
 7 Q. Okay.
 8 A. That's what drug addicts do.
 9 Q. So, all you know is is that you didn't
 10 think you had any kind of problems, either
 11 behavioral or drug problem?
 12 A. No.
 13 Q. Correct?
 14 A. Yes.
 15 Q. You think your mom was a, I guess looking
 16 back now in hindsight, looking back in time, do you
 17 think your mom was a pretty good judge of what
 18 problems you were having?
 19 A. Yes. She knew I had a drug problem, yeah, and
 20 I was out of control.
 21 Q. She also must have talked to you or you
 22 must have expressed to her -- well, let me ask it
 23 this way: Do you remember talking with your mom and
 24 expressing to her how upset you were back at that
 25 time about the automobile accident that at least

1 MR. HOROWITZ: Form.
 2 THE WITNESS: I guess.
 3 MR. HOROWITZ: Would you agree with her
 4 characterization?
 5 BY MR. CRITTON:
 6 Q. Would you agree, no, would you agree with
 7 your mother's characterization; that is, that you
 8 had a drug problem and as well you had posttraumatic
 9 stress disorder relating to the automobile accident?
 10 MR. HOROWITZ: Form.
 11 THE WITNESS: I agree I had a drug problem
 12 yes. I don't know about that I --
 13 BY MR. CRITTON:
 14 Q. Are you denying that you had posttraumatic
 15 stress disorder at that time or you just don't know?
 16 A. I don't know.
 17 MR. HOROWITZ: Form.
 18 THE WITNESS: I have never, you know --
 19 BY MR. CRITTON:
 20 Q. Do you think your mother had a pretty good
 21 grasp back in 2004, '5, '6 of the problems that were
 22 impacting you or had an impact on you?
 23 A. If she did, she wouldn't have tried to take me
 24 to so many therapists and programs.
 25 Q. You think because she took you to so many

1 from your perspective and what you told us you
 2 thought she might die?
 3 A. Yeah. I had, I told her I had dreams about it
 4 and stuff. But it says I had posttraumatic stress
 5 disorder, you know. I never -- they tried to diagnose
 6 me with it. I was never... So I don't see how that
 7 makes any sense.
 8 Q. Do you know what posttraumatic stress
 9 disorder is?
 10 A. I know what it is but I mean --
 11 Q. What do you, what do you understand if I
 12 use PTSD, posttraumatic stress disorder, what did
 13 you understand that is?
 14 MR. HOROWITZ: Form.
 15 THE WITNESS: That something traumatic is
 16 affecting your life in some kind of way.
 17 BY MR. CRITTON:
 18 Q. And do you think that the automobile
 19 accident was something that has traumatically
 20 effected your life?
 21 A. Yeah. But for her to say it like that, there
 22 was never no diagnosis of saying that I was PTSD.
 23 Q. All right. Has anybody ever diagnosed you
 24 with PTSD to your knowledge?
 25 MR. HOROWITZ: Form.

1 THE WITNESS: The therapist, the one I
 2 went to for one time said that she thinks I
 3 have posttraumatic stress disorder but how
 4 could she figure that out with one visit.
 5 BY MR. CRITTON:
 6 Q. Was that Mrs. [REDACTED]
 7 A. No.
 8 Q. Who was that?
 9 A. I don't know. I only went to her one time.
 10 Q. And who sent you to that person?
 11 A. My mom.
 12 Q. Do you know what the person's name was?
 13 A. No.
 14 Q. Do you know where it was; that is, where
 15 was the location?
 16 A. Palm Beach Gardens.
 17 Q. What time frame was it? Was it before or
 18 after she took to you Growing Together?
 19 A. I don't know. It was after the accident,
 20 so...
 21 Q. I think it was, the accident was in '03,
 22 correct? I'm sorry. It was in 2004. That was the
 23 accident up near I-95. I am sorry, I-4. So, if it
 24 was in 2004, she would have taken you to see a
 25 psychiatrist or psychologist?

1 THE WITNESS: Yeah, I see it but --
 2 MR. HOROWITZ: Never, never mind.
 3 BY MR. CRITTON:
 4 Q. Were you Baker Acted into [REDACTED] at
 5 least from your perspective? In fact, let me ask it
 6 this way: How did you get into [REDACTED]
 7 A. Growing Together.
 8 Q. And what, what happened that moved you
 9 from Growing Together to [REDACTED]
 10 A. I flipped out on them people.
 11 Q. Was it intentional to flip out; that is,
 12 were you really flipped out or did you pretend to be
 13 flipped out?
 14 A. No. I like snapped on them people. I just
 15 went off.
 16 Q. Okay. Had you snapped at any time up
 17 until --
 18 A. Nope.
 19 Q. -- that day?
 20 A. No.
 21 Q. Were you getting along pretty well with
 22 most of the people at Growing Together?
 23 A. No. I wouldn't have snapped if I was getting
 24 a long with them.
 25 Q. I'm only asking the question --

1 A. Yeah, I guess.
 2 Q. Did you know you were going to go see a
 3 psychologist or psychiatrist at the time?
 4 A. Yeah.
 5 Q. Did you she tell you why you were going to
 6 go see somebody?
 7 A. About my dreams.
 8 Q. Because you were having nightmares about
 9 the automobile accident?
 10 A. Yes, about driving.
 11 Q. Were you even more afraid of being in a
 12 car back during that time period, in the '04, '05
 13 time period?
 14 A. Yeah. I was afraid to drive. I was more
 15 cautious.
 16 Q. Well, you weren't driving then. You were
 17 riding, correct?
 18 A. Still the same thing.
 19 Q. Same thing from your -- okay. Exhibit 4,
 20 your mom's letter goes on to say that she got a call
 21 on the 29th day of your treatment from [REDACTED]
 22 [REDACTED] that you had been Baker Acted. Do you see
 23 that?
 24 MR. HOROWITZ: I could help her with the
 25 line.

1 A. No.
 2 Q. -- because I wasn't there.
 3 A. No.
 4 Q. So, what happened at Growing Together,
 5 that is, you were now, at least by your mom's letter
 6 you had been there 26, 27, 28, 29 days at Growing
 7 Together, correct? Again, if she's right.
 8 A. Yeah.
 9 Q. And had you been able to communicate with
 10 your mom or your dad or any family members during
 11 the time you were at Growing Together?
 12 A. No.
 13 Q. You didn't have access to a phone,
 14 correct?
 15 A. Yes.
 16 Q. Did you want to call your mom?
 17 A. Yeah.
 18 Q. Okay. Did you want to get out of that
 19 program?
 20 A. Yeah. I wanted to see my family.
 21 Q. Were you dating anyone at the time?
 22 A. I don't know. I don't think so. I don't
 23 remember.
 24 Q. So, what happened on the date that they
 25 took you, the date as you described you flipped out;

1 that is, what, what happened that day that made you
2 flip out?
3 A. They took me to court and my family was there
4 and they wouldn't let me talk to them. They told me we
5 were going to the dentist because recently I just had a
6 tooth pulled like the week before. So, they were
7 supposed to take me for another dentist appointment.
8 Well, instead of taking me to the dentist,
9 they started driving me downtown. And once we got
10 in the courtroom, they were like, oh, well we're
11 trying to see, they were trying to get me, I guess,
12 court ordered to stay in Growing Together, so...
13 Q. And you had no idea at that time that they
14 were going to do that?
15 A. No.
16 Q. Did you actually get into the courtroom?
17 A. Yeah.
18 Q. Okay. Did you flip out when you were in
19 the courtroom?
20 A. No.
21 Q. What happened in the courtroom, did they
22 talk about you in front of a judge?
23 A. Yes, yeah.
24 Q. Okay. And what did the judge decide?
25 A. I don't, I don't know. I don't remember.

1 Q. You just went through the motions?
2 A. Yes.
3 Q. What you had to do to survive?
4 A. Yeah.
5 Q. And Ms. Doe No. 6, when you got into
6 court, did they start talking about, did you hear
7 them say we would like her to be court ordered for
8 another umpteen days?
9 A. I don't, I don't remember what they said. I
10 was not paying attention.
11 Q. But you, I thought you said that the whole
12 preceding --
13 A. Yeah.
14 Q. -- was about keeping you there?
15 A. No. There was a, there was a courtroom filled
16 with people, different people but they weren't talking
17 about me at a certain moment.
18 Q. Okay. And when they talked about you, did
19 you, if I understood you correctly they wanted to
20 keep you there?
21 A. Yeah. I know that's what, when we pulled up
22 that's what they told me we were coming to court for.
23 Q. And what --
24 A. I didn't pay attention because I was watching
25 my mom.

1 Q. Was your family there?
2 A. Yeah.
3 Q. Did you get to wave to them?
4 A. No. I was not able to talk to nobody. I had
5 to stand in the corner.
6 Q. And not move at all?
7 A. Yeah. I wasn't allowed to talk to no officer,
8 nobody.
9 Q. Was there any other kids from Growing
10 Together or just you?
11 A. Just me and another girl that she had to,
12 like, watch me.
13 Q. She was, she was like the person who was
14 assigned to be with you that, from Growing Together?
15 A. Yes. Because she was on a higher step than
16 me, so she was supposed to watch me.
17 Q. Were you still at the bottom rung?
18 A. Yeah.
19 Q. Had you made any progress in Growing
20 Together at all?
21 A. No.
22 Q. Okay. Were you fighting the program?
23 A. I just didn't like sing and like stand up in
24 front of everybody, no. I just -- I didn't fight them.
25 but I just didn't like volunteer myself to do stuff.

1 Q. What did you say then?
2 A. Huh?
3 Q. What did you say when they said we want to
4 keep you?
5 A. What? When we got there?
6 Q. Before you got to the courtroom.
7 A. I told them they were crazy.
8 Q. Why, because you wanted to get out?
9 A. Yeah. I didn't want to stay in there.
10 Q. Did you think that you, your time was up
11 so to speak?
12 A. I don't know. I just, I wasn't going to stay
13 there for long.
14 Q. You wanted out of the program?
15 A. Yes.
16 Q. You wanted to get back home and do what
17 you were ever doing?
18 A. I just, they --
19 Q. Go ahead, I'm sorry.
20 A. They kept me away from my family. I wanted to
21 be with my family.
22 Q. You wanted to get back to your family and
23 start doing drugs again, too?
24 A. I don't -- I know I wanted to be with my
25 family.

1 Q. When you did get out, though, you started
 2 doing drugs again?
 3 A. Not right away.
 4 Q. How long?
 5 A. It took me like three months I was relapsed I
 6 would say.
 7 Q. So, you are in the courtroom. You hear
 8 they want to keep you. Did you get to talk at all
 9 or speak during the proceeding?
 10 A. No.
 11 Q. What did the judge order?
 12 A. I don't know.
 13 MR. HOROWITZ: Form.
 14 THE WITNESS: That he obviously didn't
 15 order nothing because I got out that day or a
 16 couple of days later.
 17 BY MR. CRITTON:
 18 Q. Okay. You get, at what point did you flip
 19 out?
 20 A. When I, we got back.
 21 Q. In the program in Riviera Beach?
 22 A. Yeah.
 23 Q. And what, what did you do that flipped you
 24 out?
 25 A. I told them I didn't know why they tried to do

1 because I know the cops because I was in the cafeteria
 2 area in the front doors like over here. They were like
 3 blocked off, so I don't know if they heard me or -- I
 4 am -- I know I wasn't yelling at them when they got
 5 there.
 6 Q. At the police?
 7 A. Yeah.
 8 Q. So, when the police came, did you talk to
 9 them?
 10 A. No. They just put me in handcuffs and...
 11 Q. Handcuffs behind your back, in front of
 12 your back?
 13 A. In front of my back.
 14 Q. In front of your back. Behind you; in
 15 front of you?
 16 A. In front of me.
 17 Q. And then they took you to [REDACTED]?
 18 A. Yeah. It's right across the street.
 19 Q. Had you ever been to [REDACTED] before?
 20 A. No.
 21 Q. So, they take you to [REDACTED]. Well, let
 22 me, before I get off this, I want to get back to
 23 your mother's letter for just a minute. Did you
 24 understand that you were being Baker Acted when you
 25 went to [REDACTED]?

1 that. I don't know why they, like, tried to trick me
 2 and say I was going somewhere else when I wasn't. They
 3 should have just told me right then and there, we are
 4 going to court and this is what we were doing.
 5 Q. If they had said that, what would you have
 6 said?
 7 A. I still would have went but I mean --
 8 Q. Would you have flipped out earlier?
 9 A. Probably.
 10 Q. Okay. So, when you say you flipped out,
 11 were you yelling, screaming at them?
 12 A. Yeah. I was just yelling at them.
 13 Q. Were you throwing anything?
 14 A. No.
 15 Q. Were you in any way physically violent?
 16 A. No, I just --
 17 Q. You were just yelling and screaming?
 18 A. Yeah. I was just flipping out.
 19 Q. And what did they say to you?
 20 A. They, they called the cops.
 21 Q. So, the police actually came?
 22 A. They escorted me to [REDACTED].
 23 Q. And what did they tell you -- were you
 24 still screaming when the cops came?
 25 A. I don't know. I was -- I don't remember,

1 A. I heard it afterwards. That's what they told
 2 me.
 3 Q. Did you know what, did you know what a
 4 Backer Act was?
 5 A. No.
 6 Q. And now you get to, you get to [REDACTED].
 7 And what do they do for you?
 8 A. They call my parents. They had me sit in a
 9 room. I watched TV for like the first time in weeks.
 10 Q. Is that a good deal?
 11 A. It felt nice.
 12 Q. How long do you recall your, how long do
 13 you recall, you recall you were at [REDACTED]?
 14 A. Three days, 72 hours they said. That's why I
 15 don't know where that April 10th thing comes from
 16 because we tried to return the day I got out of [REDACTED]
 17 to get to, to get my stuff.
 18 Q. From.
 19 A. From Growing Together.
 20 Q. Okay. What stuff did they have?
 21 A. Like all my toiletries, like my toothbrush and
 22 my brush and stuff like that.
 23 Q. When you, when you went to [REDACTED], you
 24 said you sat in a room for a few hours and watched
 25 TV?

1 A. (Witness nods head.)
 2 Q. Did anybody come in -- yes?
 3 A. Yeah.
 4 Q. Did anybody come in and talk to you?
 5 A. Just the nurses like they, you know, take my
 6 blood pressure, check my temperature, stuff like that.
 7 Q. Okay. Did they have you sign a bunch of
 8 forms or did your parents have to come in?
 9 A. I had my -- I know my parents had to come in
 10 and sign paperwork.
 11 Q. Okay. Do you remember signing forms too?
 12 A. I don't, I don't know.
 13 MR. CRITTON: Okay. Well, these are
 14 records that were provided by your attorneys
 15 and let me just, without, unless you want to
 16 mark one. I have no real intention to mark the
 17 whole exhibit.
 18 MR. HOROWITZ: It came from us.
 19 MR. CRITTON: Yeah. No. It came from us.
 20 It was sent to us and then you got copies. I'm
 21 sorry, because it went to Jessica Cadwell. Let
 22 me just show you one. This is a notice of
 23 patient's rights and privileges. It's just a
 24 document, and it's dated [REDACTED]. If I
 25 can ask Mr. Horowitz to pass it to you. I just

1 A. Yeah. My mom and dad.
 2 Q. What did they say to you?
 3 A. My dad said I wasn't going back. My mom
 4 always says, we'll see, we'll see.
 5 Q. Had you, had your mom -- I know you said
 6 your mom had taken you for a psychologist or
 7 psychiatric visit up in the Gardens, you told us
 8 that --
 9 A. Yeah.
 10 Q. -- at some point because you were having
 11 nightmares after the automobile accident in '04,
 12 correct?
 13 A. Yeah.
 14 Q. Had you, had you -- before Growing
 15 Together, had you ever seen another psychiatrist or
 16 psychologist for any reason or counselor?
 17 A. I don't know. I know I seen another
 18 psychiatrist on Southern and Military at the fire
 19 station or whatever. I guess that's where her office
 20 was. The fire department of, like the little fire
 21 station there.
 22 Q. Southern and what?
 23 A. It's like a fire station. It's like the
 24 Department of Fire Rescue or something.
 25 Q. That's where her office was located?

1 want to see if that's your signature.
 2 THE WITNESS: Yeah.
 3 BY MR. CRITTON:
 4 Q. Okay. Did you recognize at least your
 5 signature on the document?
 6 A. Yeah.
 7 Q. That's all I want to know because then I
 8 will be able to identify the handwriting elsewhere.
 9 Did they have you sign other forms, too,
 10 that you can recall?
 11 A. I don't even remember signing that one.
 12 Q. Did your parents ever come and see you
 13 while you were in [REDACTED]?
 14 A. Yeah.
 15 Q. Were they able to see you the very day you
 16 got into [REDACTED]?
 17 A. Yeah.
 18 Q. And what conversations did you have with
 19 your parents at that time?
 20 A. Told them I wasn't going back.
 21 Q. To Growing Together?
 22 A. Yeah.
 23 Q. Okay. And what did they say? What did
 24 you mom -- who was it was, your mom and dad or just
 25 your mom?

1 A. Yeah. Off on Southern, off of Southern on
 2 Military. But I don't know when that was. That's the
 3 only psychiatrist I've seen other than the one that I
 4 told you the two about.
 5 Q. There was a lady name Susan [REDACTED].
 6 Does that name mean anything to you?
 7 A. That's, that's not her. That's -- she's one
 8 of the psychiatrists at the office that I was going to
 9 but the --
 10 Q. This, this lady is in -- [REDACTED]
 11 office is in the Gardens.
 12 A. Yeah. That's a different one. That was my
 13 probation officer. The lady that I seen, the
 14 physiatrist, that's her office is [REDACTED]. But the
 15 lady I seen her name was --
 16 Q. [REDACTED]?
 17 A. [REDACTED] or something.
 18 Q. [REDACTED]?
 19 A. Yeah. No, no, no, not [REDACTED] --
 20 Q. There is a [REDACTED], (sic) [REDACTED] --
 21 A. [REDACTED], yeah, something like that.
 22 Q. -- [REDACTED]?
 23 A. Yeah, [REDACTED].
 24 Q. Okay. You did like her?
 25 A. Yeah.

1 Q. And did you see her as part of your
 2 probation?
 3 A. Yes.
 4 Q. That is part of your, the, I'd say the
 5 theft charge that you pled guilty to?
 6 A. Yes. I thought I had the card.
 7 Q. Other than, and I think you saw, I will
 8 get to those visits, but you haven't seen her in a
 9 number of years?
 10 A. Since my son was born. February of 2008 is
 11 the last time I seen her.
 12 Q. That's the last time you saw her?
 13 A. Yes.
 14 Q. Was the, was she; that is, when you saw
 15 her that was a, that is Ms. [REDACTED] and
 16 Ms. [REDACTED] they both, at least in looking through
 17 the records, they appear to both be involved with
 18 the criminal justice situation.
 19 A. I don't know.
 20 Q. Okay. Was, did you -- when your mom took
 21 you to see a psychologist up in Palm Beach Gardens,
 22 was that different than Ms. [REDACTED] or you think
 23 that was Ms. [REDACTED]?
 24 A. No, that was different.
 25 Q. But you don't remember that person's name?

1 Q. Do you know what point in time when that
 2 was, Ms. Doe No. 6. Was that before she took you to
 3 Growing Together?
 4 A. I don't remember what year it was. That's why
 5 I am not good with --
 6 Q. That's why I am not giving you a year or
 7 not asking for a year. Do you remember whether it
 8 was before she took you to Growing Together and then
 9 you ended up at [REDACTED]?
 10 A. I don't remember.
 11 Q. One of the reasons I'm asking it that way
 12 is because it looks like in at least from a, from a
 13 time sequence, is the automobile accident happened
 14 in 2004. The, in March of '06 you were in Growing
 15 Together. In April of '06 you were at [REDACTED].
 16 And then the criminal problems that you had from the
 17 theft, that was in, it looks like it was in '07.
 18 So, do you remember whether your mom took
 19 you to see that psychologist at Military near the
 20 fire station before Growing Together?
 21 A. I don't remember.
 22 Q. Okay. Do you remember why she took you
 23 there?
 24 A. No. Like I said, I just, I went along for the
 25 ride. She just told me I had to go somewhere and --

1 A. No.
 2 Q. Was that a male or a female?
 3 A. That was a female.
 4 Q. That was the one-time visit?
 5 A. Yes.
 6 Q. That was the, dealt with the nightmares?
 7 A. Yes.
 8 Q. Then there was another one that you saw at
 9 Southern and Military.
 10 A. Yes. And I don't remember her name either. I
 11 am not good with names.
 12 Q. How many, how many times did you see that
 13 person?
 14 A. I saw her for a couple of weeks, like once a
 15 week or something.
 16 Q. For how long?
 17 A. I don't really remember. It wasn't, it wasn't
 18 like the last one. I went to her for like six months,
 19 or eight months or something. It was only like two
 20 months maybe.
 21 Q. And did your mom take you there as well
 22 for nightmares you were having relating to the
 23 automobile accident?
 24 A. I don't even know why we went there. I just
 25 know we went.

1 Q. Did your parents, did your parents come
 2 back and see you every day when you were at
 3 [REDACTED]?
 4 A. My mom came back every day to see me, yeah.
 5 Q. Did you your dad come back at all?
 6 A. No. He went the first day. He seen me.
 7 Q. And he wanted you out?
 8 A. Yeah.
 9 Q. And why did he want you out?
 10 MR. HOROWITZ: Form.
 11 BY MR. CRITTON:
 12 Q. Did he tell you?
 13 A. Because he didn't want me to go back to --
 14 because I told him I didn't want to go back to Growing
 15 Together.
 16 Q. Did you understand that you had to spend
 17 70, because of your being Baker Acted, you had to be
 18 72 hours at [REDACTED]?
 19 A. Yeah, that's why he didn't come back, because
 20 he knew I was going to come back after the 72 hours.
 21 Q. The reports from [REDACTED], at least the
 22 records that I am looking at, it says reflect, it
 23 says reason for admit, patients own words, my
 24 thoughts of suicide, just thinking about cutting
 25 myself. Do you remember telling them at --

1 A. No.
 2 Q. -- [redacted] that?
 3 A. No.
 4 Q. Are you denying you said that?
 5 A. No. I don't remember telling them that.
 6 Q. It goes on to say, and again I am reading
 7 from the record: I have had these thoughts at
 8 Growing Together. She has told Growing Together
 9 when she was using [redacted], patient would have
 10 thoughts and has cut her wrists specifically.
 11 Had you cut your wrists before?
 12 MR. HOROWITZ: Form.
 13 THE WITNESS: Before, yeah.
 14 BY MR. CRITTON:
 15 Q. And when you cut your wrists, where were
 16 you at the time?
 17 A. At home.
 18 Q. How old were you at the time?
 19 A. It was right before then I guess. I don't
 20 really remember. I was high, I mean...
 21 Q. All right. When you were high, what did
 22 you cut your wrists with?
 23 A. A razor, I guess.
 24 Q. And do you, do you still have any scars
 25 from that?

1 Tape 2.
 2 BY MR. CRITTON:
 3 Q. Ms. Doe No. 6, when you went to [redacted],
 4 were you, I don't want to say glad to be there but
 5 were you glad to be out of Growing Together?
 6 A. Yeah.
 7 Q. And did you understand from at least
 8 talking with the nurses and the psychiatrist and the
 9 people there at [redacted], they were trying to do an
 10 evaluation of you to determine whether or not they
 11 could let you go?
 12 A. I guess.
 13 Q. All right. And would it be a correct
 14 statement that you wanted to give them accurate
 15 information so they could give you a good
 16 evaluation?
 17 A. I don't know. They let me out in three days
 18 so...
 19 Q. Well, did you intentionally lie to those
 20 people when they asked you questions, or did you
 21 tell them the truth?
 22 A. I don't remember them asking me questions.
 23 Q. So, if -- you don't remember any
 24 discussions that you had with those people?
 25 A. No. I remember like we had circles where we

1 A. Not really.
 2 Q. They seem to have gone away?
 3 A. Yeah.
 4 Q. Did you cut both wrists?
 5 A. No.
 6 Q. Just your right wrist?
 7 A. Just my right wrist.
 8 Q. You have a band on right now. What's that
 9 for?
 10 A. It's my Twilight band.
 11 Q. I'm sorry?
 12 A. Twilight, New Moon.
 13 Q. All right. It's from the last Twilight
 14 movie that came out?
 15 A. Yes.
 16 Q. And you were reading the Twilight books
 17 when we came in today. Do you like the books as
 18 well?
 19 THE VIDEOGRAPHER: Mr. Critton, we need to
 20 change the tape.
 21 MR. CRITTON: Okay.
 22 THE VIDEOGRAPHER: Going off the record at
 23 11:43 [redacted]. This is the end of tape one.
 24 THE VIDEOGRAPHER: We're back on the
 25 record at 11:58 [redacted] and this is the start of

1 all, that everybody would talk but like, like, before I
 2 don't say nothing. I don't like voluntarily just like
 3 put my business out there.
 4 Q. Well, do you remember being evaluated by a
 5 psychiatrist and a psychologist at different times?
 6 A. I remember they came in the room and asked how
 7 them I was doing.
 8 Q. Do you remember meeting with a
 9 psychiatrist named or psychologist named
 10 Dr. [redacted] [redacted] ?
 11 A. That guy came one time and it was because they
 12 we trying to give me them, bipolar [redacted] things. And
 13 he was trying to -- I only seen that guy one time.
 14 MR. HOROWITZ: Pardon me for interrupting.
 15 Jane Doe No. 6, just answer his question.
 16 BY MR. CRITTON:
 17 Q. Do you remember meeting with and speaking
 18 with Dr. [redacted] [redacted] ?
 19 A. Yes.
 20 Q. And do you remember him asking you a bunch
 21 of questions and you giving him a bunch of answers?
 22 A. Yeah, I guess.
 23 Q. And can I assume that if he asked you a
 24 question you gave him an honest answer?
 25 MR. HOROWITZ: Form.

24 (Pages 421 to 424)

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1 THE WITNESS: Yeah.
 2 BY MR. CRITTON:
 3 Q. He said, he talked about or at least the
 4 history that you gave us just a little bit ago is
 5 you remember that you cut your right wrist. Is that
 6 the only time that you have ever cut your wrist, or
 7 have you cut yourself on more than one occasion?
 8 A. No. I have only cut my -- what do you mean by
 9 only on one occasion?
 10 Q. Well, you said -- we know that you related
 11 the history of at least an attempted suicide by
 12 cutting your wrists; is that true?
 13 A. Yes.
 14 Q. Okay. And was it your intent at that time
 15 to kill yourself?
 16 A. I guess, yeah.
 17 Q. Okay. And who found you?
 18 A. Nobody. I went to sleep in my room, and my
 19 arm was all bloody.
 20 Q. Okay. You just don't remember doing it?
 21 A. Yeah, no.
 22 Q. You said yeah, no.
 23 A. No, I don't.
 24 Q. All right.
 25 A. I don't remember.

1 Q. Do you remember that she took you there
 2 because you had taken a weapon to school. Do you
 3 remember taking a knife to school?
 4 MR. HOROWITZ: Form.
 5 THE WITNESS: Yeah.
 6 BY MR. CRITTON:
 7 Q. Okay. Why, why did you take a knife to
 8 school?
 9 A. I didn't. They caught me skipping school with
 10 a knife in my purse.
 11 Q. Were you on school property when they
 12 caught you?
 13 A. No.
 14 Q. Where were you?
 15 A. I was walking to Forest Hill and Military.
 16 Q. Who caught you?
 17 A. The school police.
 18 Q. Were you near school ground?
 19 A. I was a block or two away. I was at the next
 20 light.
 21 Q. Had you, were you walking, what school was
 22 that, [REDACTED] at the time?
 23 A. [REDACTED]
 24 Q. [REDACTED] Had you been in school
 25 that day?

1 Q. You woke up and your arm was bloody?
 2 A. Yeah.
 3 Q. Were you still bleeding at THE time?
 4 A. No.
 5 Q. So, you had cut your wrists. Was it both
 6 wrists or just one?
 7 A. Just one.
 8 Q. And you had cut it and either passed out
 9 or fallen asleep?
 10 A. Yes.
 11 Q. And you woke up and there was blood all
 12 over?
 13 A. Yes.
 14 Q. But you had stopped bleeding?
 15 A. Yes.
 16 Q. Did you tell your mom?
 17 A. Yeah.
 18 Q. And what did she say? Did she freak out?
 19 A. I don't -- yeah, I guess. I don't remember.
 20 Q. Okay. Your mother referenced that you
 21 were seeing a psychiatrist or a therapist at the
 22 corner of Gun Club and Military. Do you remember
 23 that? Is that where you're telling me about near
 24 the fireplace, fire station?
 25 A. Yeah. It's in between Gun Club and Southern.

1 A. No.
 2 Q. And you were walking away?
 3 A. Yeah.
 4 Q. Let's start again. Had you been in school
 5 that day?
 6 A. No.
 7 Q. Were you intending to go to school that
 8 day?
 9 A. No.
 10 Q. You were just out walking on a school day?
 11 A. No. I got dropped off across the street at
 12 the store. My mom dropped me off at the store. And
 13 then when she leaves. I walked away.
 14 Q. So, that's when you decided to skip
 15 school?
 16 A. Yes.
 17 Q. Where were you going do you know?
 18 A. I don't know. Me and this girl were just
 19 walking to the bus stop.
 20 Q. And you just jumped on the bus and go
 21 wherever you were going?
 22 A. I guess wherever she was going.
 23 Q. And you had a knife in your purse. What
 24 kind of knife?
 25 A. I don't know. Just one of them little

1 pull-out knives. The ones that just comes out. It was
 2 just a little blade. It wasn't --
 3 Q. And did the police, how did the police --
 4 how did the school police see you?
 5 MR. HOROWITZ: Form.
 6 THE WITNESS: I guess they seen me
 7 walking.
 8 BY MR. CRITTON:
 9 Q. How would they know you were a student?
 10 MR. HOROWITZ: Form.
 11 THE WITNESS: Because I had my book bag on
 12 and my uniform on.
 13 BY MR. CRITTON:
 14 Q. Okay. [REDACTED] required a uniform?
 15 A. Yes.
 16 Q. So your, your mom let you off at the
 17 store. Mom takes off. You and your friend are
 18 going to jump on the bus and take off?
 19 A. Yes.
 20 Q. School police see you because you have a
 21 uniform and a book bag on?
 22 A. Yeah.
 23 Q. They come over, and do they look in your
 24 book bag and your purse?
 25 A. No. They asked me where am I going. I told

1 A. Maybe like a couple of days.
 2 Q. And then you said that's it; I am done
 3 with school?
 4 A. No. I just didn't, I wasn't going to that
 5 school.
 6 Q. Okay. Did you ever go back to school
 7 again after you got kicked out of [REDACTED] --
 8 you got to sent to [REDACTED], correct?
 9 A. Yes.
 10 Q. Okay. Did you go to [REDACTED] a few days?
 11 A. Yeah, a couple of days.
 12 Q. Why didn't you like it?
 13 A. Because of the neighborhood and all the people
 14 that were there.
 15 Q. What were all the people that were there?
 16 A. There was -- it was in the ghetto, around all
 17 kinds of black people.
 18 Q. Where?
 19 A. All kinds of drug dealers.
 20 Q. Where?
 21 A. On Tamarind and like 2nd Avenue or something.
 22 That's where the school was.
 23 Q. All right. Had you been in school with a
 24 lot black kids before?
 25 A. No.

1 them I was going home. I tried to make something up and
 2 they were like, well, we're going to take you back to
 3 school. They brought me back to school and brought me
 4 to the principal's office and searched my stuff.
 5 Q. And then searched your stuff?
 6 A. Yes.
 7 Q. And then you had the knife and they called
 8 the police?
 9 A. I guess, yeah.
 10 Q. And do you recall that was the reason you
 11 had to go see the therapist?
 12 MR. HOROWITZ: Form.
 13 THE WITNESS: No. I didn't know that that
 14 was why.
 15 BY MR. CRITTON:
 16 Q. What's [REDACTED] School?
 17 A. That's -- I got kicked out of [REDACTED]
 18 after all that.
 19 Q. Because of the knife incident?
 20 A. Yes.
 21 Q. And so you were sent to [REDACTED]?
 22 A. Yes.
 23 Q. Did you skip school from [REDACTED] too?
 24 A. I told my mom I wasn't going to that school.
 25 Q. Did you ever go?

1 Q. All right. Was that something that you
 2 did not want to do?
 3 A. Yes.
 4 Q. Okay. Are you uncomfortable around black
 5 people?
 6 A. So, some of them.
 7 Q. And there were a bunch of drug dealers
 8 there too?
 9 A. Well, they stand at the corner.
 10 Q. Okay. Did you ever buy any drugs from
 11 them?
 12 A. No.
 13 Q. Because you were doing drugs at the time,
 14 weren't you?
 15 A. I was at a school though.
 16 Q. Well, so, you had to buy your drugs
 17 someplace, didn't you?
 18 A. But [REDACTED] is different.
 19 [REDACTED], I have to get, I have to take
 20 off my jacket or anything. They take a metal detector
 21 around my legs. I have to take off my shoes. I can
 22 only bring a pencil and a piece of paper or a folder
 23 with a piece of paper in it.
 24 Q. Okay. So, they do searches?
 25 A. Yes.

1 Q. In and out of the school?
 2 A. Yes. And we walk in a line going to and from
 3 class.
 4 Q. So, you went there a couple of days. Did
 5 you ever going back to school again after that?
 6 A. I went to [REDACTED] to do my [REDACTED].
 7 Q. Okay. Right after [REDACTED] or just later
 8 on?
 9 A. Later on.
 10 Q. When did you obtain your [REDACTED]?
 11 A. I haven't got it yet.
 12 Q. Still working on it?
 13 A. No, not right know now. I am working right
 14 now.
 15 Q. During what time period were you working
 16 on your [REDACTED]?
 17 A. Like 2008.
 18 Q. And how far did you get?
 19 A. I went a couple of months but --
 20 Q. How long did it take, how long does it
 21 take to get a [REDACTED]?
 22 A. It depends what, what, you know, what level
 23 you are in and certain things.
 24 Q. What level do you think you are in or were
 25 you tested out at?

1 A. Well, I was really bad in language arts so I
 2 need a lot of work there. And I was like at like a
 3 seventh grade level in reading and a tenth grade level
 4 in math. So I needed work in reading and language arts.
 5 Q. Do you intend to finish that?
 6 A. Soon.
 7 Q. All right. Also, now back to the [REDACTED]
 8 records. The report also indicates that your
 9 parents were divorced in June of '97. That was
 10 true, but they were back living together; is that
 11 correct?
 12 A. Yeah.
 13 Q. All right. And you started using [REDACTED] in
 14 2000?
 15 A. No.
 16 Q. When do you think you started using [REDACTED]?
 17 A. I don't know, like 2004, 2005.
 18 Q. All right. You don't remember?
 19 A. It wasn't 2000. I know it wasn't 2000. I
 20 would have been ten.
 21 Q. All right. You indicated to the doctor
 22 that you had a stressful relationship with your
 23 mother; is that true?
 24 A. Yeah. We fight sometimes.
 25 Q. Okay. And you had a difficult

1 relationship with your father because you had told
 2 him that you were attracted to females, correct?
 3 A. Yeah.
 4 Q. Do you remember as well you told the
 5 doctor that you were molested by a random man in the
 6 neighborhood?
 7 A. No. What doctor did I tell that to?
 8 Q. Dr. [REDACTED].
 9 A. No.
 10 Q. Okay. He touched you over the top of your
 11 clothes in private areas and then he ran away and
 12 that's why you brought the knife to school to
 13 protect yourself. Do you remember telling him that?
 14 A. No.
 15 Q. Okay. Well, he couldn't have made it up.
 16 So, where else -- was there anyone else in the room
 17 with you at the time that the questions were asked
 18 about your history?
 19 MR. HOROWITZ: Form.
 20 THE WITNESS: I don't, I don't even
 21 remember those questions.
 22 BY MR. CRITTON:
 23 Q. So, if the doctor's report says the
 24 history of abuse and you say patient shared that she
 25 was molested by a random man in the neighborhood.

1 He touched her over the top of her clothes in
 2 private areas. Patient, you, ran away, and this is
 3 when she brought a knife with her for protection and
 4 it was found on her at school. Do you recall that
 5 occurring?
 6 A. No.
 7 Q. Are you saying that the doctor made that
 8 up?
 9 MR. HOROWITZ: Form.
 10 THE WITNESS: No. I just, I don't know
 11 where that whole paper came from.
 12 BY MR. CRITTON:
 13 Q. Well, it is true because you -- well, let
 14 me strike that. Isn't it true that a random man in
 15 the neighborhood, in fact, molested you and touched
 16 you in private areas?
 17 A. No. The same thing with I don't know how they
 18 said I was cutting myself because I wasn't doing that.
 19 Q. Do you ever recall telling the doctor that
 20 you were going to go to Carp after you left
 21 [REDACTED]?
 22 A. No.
 23 Q. Did you think at the time that you entered
 24 [REDACTED] that you were both depressed and suicidal?
 25 A. I was depressed.

1 Q. Did you consider yourself suicidal?
 2 A. No.
 3 Q. Do you remember, well, let me strike that.
 4 Did you ever cut your legs?
 5 A. No.
 6 Q. Prior to April, your admission to
 7 [REDACTED] ?
 8 A. No.
 9 Q. If you have scars on your leg, the upper
 10 portion of the thigh of either your left or right
 11 leg, do you know what those scars are from?
 12 A. I don't have any scars.
 13 Q. When were you discharged from [REDACTED] ?
 14 Were you discharged with any medication?
 15 A. No.
 16 Q. Okay. Were you placed on any medication
 17 when you were in [REDACTED] ?
 18 A. No, I don't think so.
 19 Q. Do you remember meeting with a social
 20 worker at [REDACTED] ?
 21 A. No.
 22 Q. Would it be a correct statement Ms. Doe
 23 No. 6 you told individuals at [REDACTED] that you were
 24 sad as a result of the car accident in September of
 25 '04 where you thought your mother was dead, do you

1 remember telling them that?
 2 A. No. I have told everybody that that -- I
 3 don't, I thought my mom was, I was going to lose my mom.
 4 Q. Do you remember after the automobile
 5 accident you started using [REDACTED] ?
 6 A. I guess. I mean, like said, I don't know when
 7 I started.
 8 Q. Okay. In another report other than
 9 Dr. [REDACTED] there is, she also admits to being
 10 molested by a random man in her neighborhood where
 11 he touched her on the top of her clothes and she ran
 12 away. She then was carrying a knife and she got
 13 caught with the knife at school. Do you remember
 14 that, saying that to someone?
 15 A. Where they, no. I don't remember that's what
 16 I am saying. They must have been in the same room
 17 because I didn't talk to, I only talk to people in that,
 18 in that circle.
 19 Q. Are you now denying that you were molested
 20 by a man in your neighborhood?
 21 A. No. I am saying it didn't happen.
 22 Q. All right. So, you're saying that you
 23 were never molested by anyone?
 24 A. In my neighborhood, no.
 25 Q. All right. Well, you never mentioned to

1 [REDACTED] nor to Growing Together that you had ever
 2 been touched in any inappropriate way by
 3 Mr. Epstein, did you?
 4 A. I never told them I was molested by anyone.
 5 Q. You may not have but at least their
 6 records, I am just representing to you that their
 7 records reflect what you said with regard to the
 8 random man molesting you in your neighborhood which
 9 you now deny, correct?
 10 A. Their records also say I was cutting myself.
 11 Q. Well, you told --
 12 MR. HOROWITZ: Just answer his question.
 13 THE WITNESS: No. That's, I guess that's
 14 what they say I guess, I don't --
 15 BY MR. CRITTON:
 16 Q. But you did cut yourself because you --
 17 A. Before.
 18 Q. -- you pointed to your -- let me finish,
 19 you did cut yourself because you pointed to your
 20 left wrist where you were cut, correct?
 21 A. Yes, before.
 22 Q. Before?
 23 A. Before [REDACTED] and Growing Together I was
 24 cutting myself.
 25 Q. Right. And that's what their records

1 said. It's a history of having done that. History
 2 means it happened in the past. Do you understand
 3 that?
 4 A. Yeah.
 5 Q. All right. So, they weren't saying at
 6 Growing Together you were cutting yourself or that
 7 you had just done it, but that you had done it
 8 previously. Okay?
 9 A. They also said that I was suicidal and that's
 10 why I was sent there, and that's not why. Even in this
 11 letter says that they don't know why I was sent.
 12 Q. Your mother's letter, Exhibit 4?
 13 A. Yeah. She was never told why I was there so
 14 how would they say and how would I be seen by a bunch of
 15 people when I have to be seen when my mom was there.
 16 Right?
 17 Q. Now, Ms. [REDACTED] and Ms. [REDACTED] you
 18 believe you saw through as a result through the
 19 correctional department?
 20 A. Yes.
 21 Q. As a result of the theft charge?
 22 A. Yes, burglary.
 23 Q. Burglary. That was a felony to which you
 24 pled guilty?
 25 A. Yes.

1 Q. Did you ever mention to Ms. [REDACTED] or
 2 Ms. [REDACTED] -- well, let me strike that.
 3 What was the, what did you understand the
 4 purpose of being seen by Ms. [REDACTED] and
 5 Ms. [REDACTED] was?
 6 A. It was part of my probation.
 7 Q. It was required?
 8 A. Yes.
 9 Q. And as part of your probation what did you
 10 understand that they were supposed to do for you?
 11 A. I don't know. I know it was something I had
 12 to do, or I was going to be violated.
 13 Q. What did they talk to you about?
 14 A. We talked about being a -- I was pregnant at
 15 the time she talked about being a new mom.
 16 Q. Did she ever ask about your history?
 17 A. Yeah, we might have.
 18 Q. Did you ever talk to her about the car
 19 accident?
 20 A. Yeah.
 21 Q. Okay. Did you talk to her about having --
 22 well, let me strike that. Did you talk to her about
 23 your criminal charge?
 24 A. Yes.
 25 Q. Did she, did you talk to her about having

1 her but I didn't hang out with her anymore, no.
 2 Q. And up until the time that the lawsuit was
 3 filed by your attorneys seeking millions of dollars
 4 in damage from Mr. Epstein, you had never seen a
 5 psychologist, a psychiatrist, or a therapist for any
 6 reason, true, relating to Mr. Epstein?
 7 A. What?
 8 Q. Up until the time that you filed the
 9 lawsuit against Mr. Epstein seeking millions of
 10 dollars, you had never seen a psychologist, a
 11 psychiatrist, a therapist, or a doctor for any
 12 reason relating to Mr. Epstein; is that correct?
 13 MR. HOROWITZ: Form.
 14 THE WITNESS: No.
 15 BY MR. CRITTON:
 16 Q. That's not correct or that's correct?
 17 A. No. That's correct, yeah.
 18 Q. All right. And since you filed the
 19 lawsuit, the only person or therapist that you've
 20 talked to, well, really -- let me strike that.
 21 Since you filed the lawsuit, the only individuals
 22 whom you have seen that are psychiatrists would be
 23 Dr. [REDACTED], whom you were sent to by your attorneys,
 24 and Dr. [REDACTED], who did an evaluation of you by me,
 25 correct?

1 brought a knife to school?
 2 A. I don't know. Maybe, I guess.
 3 Q. Okay. Did you talk to her about the man
 4 who molested you in the neighborhood?
 5 A. No, because it didn't happen.
 6 Q. Is there any reason -- well, let me strike
 7 that. Did you talk to her about your allegations
 8 that you went to Mr. Epstein's house?
 9 A. No.
 10 Q. Until you, until you were contacted by the
 11 FBI, the only person who purportedly would have
 12 known that you were at Mr. Epstein's house would
 13 have been whom?
 14 A. [REDACTED], who I went with.
 15 MR. HOROWITZ: You mean besides Epstein?
 16 MR. CRITTON: I am talking about someone
 17 you knew. [REDACTED] would have been the only
 18 person?
 19 THE WITNESS: She went with me, yes.
 20 BY MR. CRITTON:
 21 Q. And I think you told me last time you and
 22 [REDACTED] were not friends after that; that is, you had
 23 very little dealings with her after that period of
 24 time?
 25 A. Yeah. I didn't really -- I talked -- I seen

1 A. Yeah.
 2 Q. And at no time during your stay at Growing
 3 Together at the time you were at [REDACTED] [REDACTED]
 4 at the time that you were seen by any other
 5 therapist or psychologist or psychiatrist, did you
 6 ever mention that Mr., that anything had occurred in
 7 inappropriately when you were at Mr. Epstein's
 8 house, true?
 9 MR. HOROWITZ: Form.
 10 THE WITNESS: I never told none of them
 11 people that I was molested in any way. That's
 12 why I don't go to psychiatrists now, because
 13 you see I have done been to like five. That's
 14 why I am not -- so, I don't go. I am grown
 15 now. I don't have to -- I don't need somebody
 16 telling me that I need to go see a counselor.
 17 BY MR. CRITTON:
 18 Q. Okay. And you have no intention of seeing
 19 a counselor in the future, do you?
 20 A. I don't -- probably not.
 21 MR. CRITTON: I have no other questions.
 22 Thank you.
 23 MR. HOROWITZ: That's it.
 24 THE VIDEOGRAPHER: Off the record at
 25 12:13 [REDACTED]. This is the end of Tape 2 and the

1 end of the deposition.
2 (Witness excused.)
3 (Deposition was concluded.)

4
5 CERTIFICATE OF OATH
6 THE STATE OF FLORIDA
7 COUNTY OF PALM BEACH

8
9
10 I, the undersigned authority, certify that
11 JANE DOE NO. 6 personally appeared before me
12 and was duly sworn on the 6th day of February,
13 2010.

14 Dated this 20th day of April, 2010.

15
16
17
18
19 *Cynthia J. Hopkins*



20 Cynthia Hopkins, RPR, FPR
21 Notary Public - State of Florida
22 My Commission Expires: February 25, 2011
23 My Commission No.: DD 643788
24
25

1 DATE: April 20th, 2010
2 TO: Ms. Jane Doe No. 6
3 c/o ADAM D. HOROWITZ, ESQUIRE
4 MERMELSTEIN & HOROWITZ, [REDACTED]
5 18205 Biscayne Boulevard
6 Suite 2218
7 Miami, Florida 33160

8 IN RE: Jane Doe No. 2 vs. Epstein
9 CASE NO.: 08-CIV-80119-MARRA/JOHNSON

10 Please take notice that on Wednesday, the 6th
11 of February, 2010, you gave your deposition in the
12 above-referred matter. At that time, you did not
13 waive signature. It is now necessary that you sign
14 your deposition.

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

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

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

Very truly yours,

Cynthia J. Hopkins

Cynthia Hopkins, RPR, FPR

I do hereby waive my signature.

JANE DOE NO. 6

1 CERTIFICATE
2 THE STATE OF FLORIDA
3 COUNTY OF PALM BEACH

4
5 I, Cynthia Hopkins, Registered Professional
6 Reporter, Florida Professional Reporter and Notary
7 Public in and for the State of Florida at large, do
8 hereby certify that I was authorized to and did
9 report said deposition in stenotype; and that the
10 foregoing pages are a true and correct transcription
11 of my shorthand notes of said deposition.

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

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

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

25 Dated this 20th day of April, 2010.

Cynthia J. Hopkins
Cynthia Hopkins, RPR, FPR

1 CERTIFICATE

2
3 THE STATE OF FLORIDA
4 COUNTY OF PALM BEACH

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

11
12 Dated this ___ day of _____,
13 2009.

14
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19 JANE DOE NO. 6
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25

1 ERRATA SHEET
2 IN RE: JANE DOE NO. 2 VS. EPSTEIN
3 CR: Cynthia Hopkins, RPR, FPR
4 DEPOSITION OF: JANE DOE NO. 6
5 TAKEN: April 6, 2010

6 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
7 PAGE # LINE # CHANGE REASON
8
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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: _____