

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

[Redacted])
Plaintiff,)
vs. No. [Redacted])
JEFFREY EPSTEIN and [Redacted])
Defendants.)

West Palm Beach, Florida
April 30th, 2009
10:08 o'clock A.M.

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

1 INDEX 4
2 Direct Examination by Mr. Edwards
3
4 EXHIBIT INDEX
5 Plaintiff's Exhibit Number 1 marked for I.D. 24
6 (Exhibit held by Attorney Edwards.)
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8 ++++++++
9
10 Deposition of JEFFREY EPSTEIN, a witness
11 of lawful age, taken by the Plaintiff, for the
12 purpose of discovery and for use as evidence in the
13 above entitled cause, wherein: E.W. is the
14 Plaintiff, and JEFFREY EPSTEIN and [Redacted] are
15 the Defendants, in the Circuit Court in and for Palm
16 Beach County, Florida, pursuant to notice heretofore
17 filed, before LINDA P. AUKAMP, a Registered
18 Professional Reporter and Notary Public in and for
19 the State of Florida at Large, at 250 Australian
20 Avenue South, Suite 1400, West Palm Beach, Palm
21 Beach County, Florida, on the 30th day of April,
22 2009, commencing at 10:08 o'clock A.M.
23
24
25

1 APPEARANCES:
2 For The Plaintiff:
3 ROTHSTEIN, ROSENFELDT, ADLER
4 401 East Las Olas Boulevard, Suite 1650
5 Fort Lauderdale, Florida, 33301-4252
6 By BRADLEY JAMES EDWARD, ESQUIRE and
7 WILLIAM J. BERGER, ESQUIRE and
8 RUSSELL ADLER, ESQUIRE
9
10 For The Defendant:
11 BURMAN, CRITTON, LUTTIER & COLEMAN
12 515 North Flagler Drive, Suite 400
13 West Palm Beach, Florida 33401-4349
14 By JOHN MICHAEL BURMAN, ESQUIRE
15
16 Also for the Defendant:
17 ATTERBURY, GOLDBERGER & WEISS, P.A.
18 250 Australian Ave. South, Suite 1400
19 West Palm Beach, Florida 33401
20 By JACK A. GOLDBERGER, ESQUIRE
21
22 Also Present:
23 Jeff Abbott, Videographer, Visual Evidence
24
25

1 THEREUPON,
2 THE VIDEOGRAPHER: This is the 30th day of
3 April, 2009. The time is 10:08 a.m. This is
4 videotaped deposition of Jeffrey Epstein in the
5 matter of [Redacted] versus Epstein. This deposition
6 is being held at 250 Australian Avenue South,
7 West Palm Beach, Florida. My name is Jeff
8 Abbott, I am the videographer representing
9 Visual Evidence, Incorporated.
10 Would the attorneys please announce their
11 appearances for the record.
12 MR. EDWARDS: Brad Edwards on behalf of
13 the plaintiff. And this deposition was set in
14 the case of [Redacted]
15 THE VIDEOGRAPHER: Oh.
16 MR. EDWARDS: That is a separate client of
17 mine, but that's not the case.
18 THE VIDEOGRAPHER: Okay, that's what I
19 had. Sorry.
20 MR. BERGER: And I'm William J. Berger,
21 for the plaintiff, also.
22 MR. GOLDBERGER: Jack Goldberger on behalf
23 of Jeffrey Epstein.
24 MR. BURMAN: Michael Burman on behalf of
25 Jeffrey Epstein.

1 THEREUPON,

2 JEFFREY EPSTEIN,

3 Being a witness in the notice heretofore
4 filed, being of lawful age, and being first duly
5 sworn in the above cause, testified on his oath as
6 follows:

7 THE WITNESS: Yes, I do.

8 DIRECT EXAMINATION

9 Q. (By Mr. Edwards) Can you tell us your
10 full name for the record?

11 A. Jeffrey Edward Epstein.

12 Q. And what's your date of birth?

13 A. January 20th, 1953.

14 Q. And your social security number?

15 A. [REDACTED]

16 Q. And your current address in West Palm
17 Beach?

18 A. I intend to respond to all relevant
19 questions regarding this lawsuit. However, at the
20 present time my attorneys have counseled me that I
21 cannot provide answers to any questions relevant to
22 this lawsuit, and I must accept the advice or risk
23 losing my Sixth Amendment right to effective
24 representation.

25 Accordingly, I assert my Fifth, Federal

1 Constitutional rights as guaranteed by the Fifth,
2 Sixth, and Fourteenth Amendments to the United
3 States Constitution.

4 Q. So you're unwilling to give us your
5 address of your house in Palm Beach County?

6 A. I intend to respond to all relevant
7 questions regarding this lawsuit. However, at the
8 present time my attorneys have counseled me that I
9 cannot provide answers to any questions relevant to
10 this lawsuit or risk losing my Sixth Amendment right
11 to effective representation.

12 MR. EDWARDS: Mr. Goldberger, can we enter
13 into an agreement so that we all know that he's
14 reading off of that piece of paper, we know
15 what the whole spiel is, but maybe he can just
16 say fifth or same answer or something like
17 that, so we can continue to move on, rather
18 than read that paper the entire time? We'll be
19 here for days.

20 MR. GOLDBERGER: I think out of an
21 abundance of caution it's probably appropriate
22 that whatever we feel is the proper response
23 is, so that our invocation of our Fifth
24 Amendment privileges is properly protected,
25 so I think we're going to have to give the full

1 length --

2 MR. BURMAN: Obviously we can't tell what
3 you're going to play to a jury without the
4 entire spiel, what questions you might play to
5 a jury if you decide to do that when this case
6 is tried, so we're going to go with the entire
7 spiel to every question you ask. If -- that's
8 Mr. Goldberger's representation, or
9 recommendation.

10 MR. EDWARDS: Okay.

11 MR. GOLDBERGER: We will go question by
12 question, and we may or may not invoke Fifth
13 Amendment privileges and there may be times
14 where I'm going to have to think about it,
15 discuss it with Mr. Burman whether we're going
16 to invoke on any particular question, but on
17 those questions that we do invoke Fifth
18 Amendment privileges, I think we have no choice
19 but, as you say, do the entire spiel.

20 Q. (By Mr. Edwards) Can you tell me the
21 addresses of other homes that you own outside of
22 West Palm Beach?

23 A. I intend to respond to all relevant
24 questions regarding this lawsuit. However, in the
25 present my attorneys have counseled me that I cannot

1 provide answers to any questions relevant to this
2 lawsuit, and I must accept the advice or risk losing
3 my Sixth Amendment right to effective
4 representation.

5 Q. Have you seen any --

6 MR. GOLDBERGER: And, excuse me, and your
7 Fifth Amendment privileges.

8 THE WITNESS: Yes.

9 Accordingly, I, excuse me, I assert my
10 Federal Constitutional rights as guaranteed by
11 the Fifth, Sixth and Fourteen Amendments of the
12 United States Constitution.

13 Q. (By Mr. Edwards) Have you seen any
14 psychologists or psychiatrists in your life?

15 MR. GOLDBERGER: Go ahead.

16 THE WITNESS: I intend to respond to all
17 relevant questions regarding this lawsuit.
18 However, at the present time my attorneys have
19 counseled me that I cannot provide answers to
20 any questions relevant to this lawsuit, and I
21 must accept this advice or risk losing my Sixth
22 Amendment right to effective representation.

23 Accordingly, I assert my constitutional
24 rights as guaranteed by the Fifth, Sixth and
25 Fourteenth Amendment of that constitution.

1 Q. (By Mr. Edwards) Tell me the names of all
2 the businesses in which you are affiliated in any
3 way?

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

11 I also assert my Federal Constitutional
12 Rights as guaranteed by the Fifth, Sixth, and
13 Fourteenth Amendments to the United States
14 Constitution.

15 Q. My understanding is you're currently
16 serving a 12-month jail sentence, is that correct?

17 MR. GOLDBERGER: You can answer, but --

18 THE WITNESS: No.

19 Q. (By Mr. Edwards) You were currently, you
20 were initially sentenced to 18 months in jail, is
21 that correct?

22 MR. GOLDBERGER: Go ahead.

23 THE WITNESS: Yes.

24 Q. (By Mr. Edwards) And at the present
25 moment are you still under the supervision of that

1 jail sentence?

2 A. Yes.

3 Q. Do you know what your release date will
4 be?

5 A. No.

6 Q. You have not been told the date of your
7 release?

8 A. Not yet.

9 Q. Where do you plan to reside when you're
10 released from jail?

11 A. I intend to respond to all relevant
12 questions regarding this lawsuit. However, at the
13 present time my attorneys have advised me that I
14 must accept the advice, advised me not to answer
15 those questions. I must accept their advice or risk
16 losing my Sixth Amendment right to effective
17 representation.

18 Accordingly, I assert my Federal
19 Constitutional right as guaranteed by the Fifth,
20 Sixth, and Fourteenth Amendment of the constitution.

21 Q. Mr. Epstein, I have a videotaped copy of
22 the plea colloquy where you pled guilty and told
23 that judge you would be residing in West Palm Beach,
24 Florida. Are you saying now that the statement you
25 made to that judge is no longer true?

1 A. Sorry, could you repeat the question?

2 Q. Sure.

3 I have a videotaped copy of the plea
4 colloquy --

5 A. No, the question before that. That's --
6 okay.

7 Q. The question is, where do you intend to
8 reside once you are released from jail?

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

16 Accordingly, I assert my Federal
17 Constitutional right as guaranteed by the Fifth,
18 Sixth, and Fourteenth Amendment of the United States
19 Constitution.

20 Q. As you know, that question was asked to
21 you when you pled guilty last June in 2008, and you
22 responded to the judge that you planned to reside in
23 West Palm Beach, Florida. Is that no longer your
24 intent?

25 A. I intend to respond to all relevant

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

7 Accordingly, I assert my Federal
8 Constitutional right as guaranteed by the Fifth,
9 Sixth, and Fourteenth Amendment of the constitution.

10 Q. This deposition is not being taken in the
11 county jail, but rather in your attorney, Jack
12 Goldberger's office, so can you please inform the
13 jury as to your current schedule as it is exists
14 today?

15 MR. GOLDBERGER: Let me hold off on that.
16 Okay.

17 THE WITNESS: I don't understand the
18 schedule, the question.

19 MR. GOLDBERGER: Yeah, if you can just, if
20 you can rephrase the question, I think we can
21 answer it for you.

22 Q. (By Mr. Edwards) Okay. Currently you
23 described that you're under the supervision of the
24 jail sentence at this point in time, you're within
25 the 18 months of your jail sentence. But this isn't

1 a jail setting, so obviously you're outside of the
2 jail setting.

3 I am asking you just to tell the jury your
4 current schedule; you wake up, are you released from
5 jail at some time, do you have to report back to
6 jail on a daily basis?

7 A. Yes, I report back to jail at 8:00 p.m.

8 Q. Every single day?

9 A. Yes.

10 Q. And is it seven days a week that you're
11 out on work release?

12 A. No, sir.

13 Q. How many days a week are you out on work
14 release?

15 A. Six.

16 Q. And of those six days, how many hours per
17 day are you out on work release?

18 A. Twelve.

19 Q. And what are the hours that you're out on
20 work release versus the hours that you are confined
21 to the jail?

22 A. Repeat the question, please.

23 Q. What are the hours that you are out on
24 work release outside the jail versus the hours that
25 you are inside the jail, meaning if you report back

1 to the jail at 8:00 and stay there until 8:00 in the
2 morning, tell me that.

3 A. I just did.

4 Q. And is that the schedule?

5 A. I just did. Yes, that's the schedule.

6 Q. Okay. So from 8:00 p.m. until 8:00 a.m.
7 you're in the jail?

8 A. Yes.

9 Q. And then from 8:00 a.m. to 8:00 p.m.
10 you're out on work release?

11 A. Is that a question?

12 Q. Yes.

13 A. Yes.

14 Q. And where do you, where do you work?

15 MR. GOLDBERGER: Objection.

16 THE WITNESS: I intend to respond to all
17 relevant questions to this lawsuit. However,
18 at the present time my attorneys have counseled
19 me that I cannot provide answers to any
20 questions relevant to this lawsuit, and I must
21 accept this advice or risk losing my Sixth
22 Amendment right to effective representation.

23 Therefore, I assert my Federal
24 Constitutional right as guaranteed by the
25 Fifth, Sixth, and Fourteenth Amendment of the

1 constitution.

2 Q. (By Mr. Edwards) Are you saying that
3 providing me an answer as to where you currently
4 work, would somehow incriminate you?

5 MR. GOLDBERGER: Let's not be
6 argumentative. He responded to the question on
7 advice of counsel, and if you think that was an
8 improper invocation, then you have a remedy,
9 but don't argue with the witness, which is what
10 we did. Okay.

11 Q. (By Mr. Edwards) Do you have any plans to
12 leave the country once you're released from jail?

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

20 Accordingly, I assert my Federal
21 Constitutional right as guaranteed by the Fifth,
22 Sixth, and Fourteenth Amendment of the constitution.

23 Q. Do you currently own any jets or
24 airplanes?

25 A. I intend to respond to all relevant

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

7 Accordingly, I assert my constitutional
8 right as guaranteed by the Fifth, Sixth, and
9 Fourteenth Amendment of the constitution.

10 MR. BURMAN: Is [REDACTED] a state or federal
11 case?

12 MR. EDWARDS: State.

13 MR. BURMAN: Okay. I am going to, in
14 addition to my client's assertion of his
15 rights, also object on the grounds that
16 punitive damages hasn't been allowed in this
17 case yet. That's clearly a financial-type
18 question and, therefore, we object on those
19 grounds, as well.

20 MR. EDWARDS: Thank you.

21 Q. (By Mr. Edwards) Who are the pilots that
22 are employed by you or work for you or fly your
23 airplanes?

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

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

6 Accordingly, I assert my Federal
7 Constitutional rights guaranteed by the Fifth,
8 Sixth, and Fourteenth Amendment to the United States
9 Constitution.

10 Q. What person or persons make your travel
11 arrangements when you travel?

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

19 Accordingly, I would have to assert my
20 Federal Constitutional right as guaranteed by the
21 Fifth, Sixth, and Fourteenth Amendment of the
22 constitution.

23 Q. Once you are released from jail, are you
24 under an obligation to report to probation?

25 A. Yes.

1 Q. Do you intend to do so?

2 A. Yes.

3 Q. And once you are released, do you,
4 according to your sentence, are you scheduled to
5 serve one year community control or house arrest?

6 MR. GOLDBERGER: That's a compound
7 question. Please rephrase it.

8 THE WITNESS: Yes.

9 Q. (By Mr. Edwards) When you're released
10 from jail, do you intend to serve one year community
11 control as a part of your sentence?

12 A. Yes.

13 Q. And under that provision, will you be able
14 to continue working or will you be strictly confined
15 to your house?

16 MR. GOLDBERGER: That calls for a legal
17 interpretation on the part of my client that
18 he's just not, he's just not competent to
19 answer. So, if you know, fine, but I can't
20 imagine you would know.

21 THE WITNESS: I don't know.

22 Q. (By Mr. Edwards) Who are the people that
23 will be living or working in your house once you are
24 released from jail?

25 A. I intend to respond to all relevant

1 questions regarding this lawsuit. However, at the
2 present time my attorneys have advised me that I
3 cannot provide answers to any questions currently.
4 Therefore, I must accept this advice or risk losing
5 my Sixth Amendment right to effective
6 representation.

7 Accordingly, I assert my Federal
8 Constitutional right as guaranteed by the Fifth,
9 Sixth, and Fourteenth Amendment to the constitution.

10 Q. Are you currently working with the Florida
11 Science Foundation?

12 MR. GOLDBERGER: Umm, okay.

13 THE WITNESS: Yes.

14 Q. (By Mr. Edwards) And that is a, a
15 business that operates just next door to your
16 attorney, Jack Goldberger's office, is that correct?

17 A. No.

18 Q. The Florida Science Foundation does not
19 have an office on this floor right next door to your
20 attorney, Jack Goldberger's office?

21 A. Is that a question?

22 Q. Yes.

23 A. You have to rephrase the question, please?

24 Q. Does the Florida Science Foundation have
25 an office right next door to your attorney, Jack

1 Goldberger's office?

2 A. No.

3 Q. What is your role with the Florida Science
4 Foundation?

5 A. I intend to respond to all relevant
6 questions regarding this lawsuit. However, at the
7 present time my attorneys have advised me that I
8 cannot answer questions relevant to this lawsuit and
9 must accept their advice, or risk losing my Sixth
10 Amendment right to effective representation.

11 Therefore, I must assert my Federal
12 Constitutional right under the Fifth, Sixth, and
13 Fourteenth Amendment to the constitution.

14 Q. What does the Florida Science Foundation
15 do?

16 A. I intend to respond to all relevant
17 questions to this, regarding this lawsuit. However,
18 at the present time my attorneys have counseled me
19 that I cannot provide answers to any questions
20 relevant to this lawsuit. I must accept their
21 advice or risk losing my Sixth Amendment right to
22 effective representation.

23 Accordingly, I assert my Federal
24 Constitutional rights guaranteed by the Fifth,
25 Sixth, and Fourteenth Amendment to that

1 constitution.

2 Q. Have you procured minors for the purposes
3 of prostitution?

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

11 Accordingly, I assert my Federal
12 Constitutional right as guaranteed by the Fifth,
13 Sixth and Fourteenth Amendment of the United States
14 Constitution.

15 Q. Isn't it true that you did plead guilty to
16 two felonies related to prostitution with minors?

17 MR. GOLDBERGER: Wait a minute, let me
18 just hold off a second.

19 (Thereupon, a discussion was had off
20 the record.)

21 MR. GOLDBERGER: You can answer the
22 question.

23 THE WITNESS: Could you repeat the
24 question?

25 Q. (By Mr. Edwards) Isn't it true that you

1 pled guilty to two felony counts related to
2 procurement of a minor for prostitution and/or
3 solicitation of a minor for prostitution?

4 A. No.

5 Q. What counts did you plead guilty to?

6 A. Procuring a minor for prostitution and
7 soliciting prostitution.

8 Q. Have you had sex with minor girls?

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

16 Accordingly, I assert my Federal
17 Constitutional right under the Fifth, Sixth, and the
18 Fourteenth Amendment to the Constitution.

19 Q. Have you engaged in sex acts with girls
20 who at the time you engaged in those sex acts were
21 minors?

22 A. I intend to respond to all relevant
23 questions to this lawsuit. At the present time my
24 attorneys have counseled me that I cannot respond,
25 I'm sorry, provide answers to any questions relevant

1 to this lawsuit, and I must accept that advice or
2 risk losing their representation.

3 Accordingly, I assert my Federal
4 Constitutional right as guaranteed by the Fifth,
5 Sixth, and Fourteenth Amendment.

6 Q. Did you intentionally touch my client,
7 [REDACTED]?

8 A. I don't understand the question, sorry.

9 Q. For the purpose of this lawsuit, we have
10 used the pseudonym to describe my client. Do you
11 know who I'm talking about when I refer to [REDACTED]?

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

19 Q. Did you --

20 A. Accordingly -- excuse me -- I assert my
21 Federal Constitutional right as guaranteed by the
22 Fifth, Sixth, and Fourteenth Amendment to the United
23 States Constitution.

24 MR. BURMAN: We further object on the
25 ground that [REDACTED] name has not been disclosed

1 and you've objected to that.

2 MR. EDWARDS: Thanks.

3 Q. (By Mr. Edwards) Did you touch my client,
4 [REDACTED], against her will?

5 A. We don't know who [REDACTED] is. You haven't
6 told me who [REDACTED] is.

7 Q. Okay.

8 MR. EDWARDS: Do you have an exhibit
9 sticker?

10 (Thereupon, Plaintiff's Exhibit
11 Number 1 was marked for Identification by
12 Attorney Edwards.)

13 Q. (By Mr. Edwards) I'm going to show you an
14 exhibit that I have marked for identification
15 purposes as Plaintiff's Exhibit 1.

16 Do you recognize the girl on the left in
17 the photograph?

18 A. I intend to respond to all relevant
19 questions regarding --

20 THE WITNESS: Excuse me one second.
21 (Thereupon, a discussion was had off
22 the record.)

23 THE WITNESS: I intend to respond to all
24 relevant questions regarding this lawsuit.
25 However, at the present time my attorneys have

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

5 Accordingly, I assert my Federal
6 Constitutional right as given by the Fifth,
7 Sixth -- as provided by the Fifth, Sixth, and
8 Fourteenth Amendment to the constitution.

9 Q. (By Mr. Edwards) Do you know somebody by
10 the name of [REDACTED]

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

18 Accordingly, I assert my Federal
19 Constitutional right as guaranteed by the Fifth,
20 Sixth and Fourteenth Amendment to the constitution.

21 Q. For the purposes of this deposition, when
22 I refer to [REDACTED], I'm speaking of [REDACTED]

23 Back to my initial question. Did you
24 touch my client, [REDACTED], against her will?

25 A. I intend to respond to all relevant

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

7 Accordingly, I assert my Fifth, Sixth, and
8 Fourteenth -- Fifth, Sixth and Fourteenth Amendment
9 of the constitution.

10 Q. Did you engage in sex or sex acts with my
11 client, [REDACTED] against her will?

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

19 Accordingly, I assert my Federal
20 Constitutional right as guaranteed by the Fifth,
21 Sixth, and Fourteenth Amendment to that
22 constitution.

23 Q. Isn't it true that when you touched [REDACTED]
24 against her will, you knew her to be a minor at the
25 time?

1 A. I intend to respond to all relevant
2 questions regarding this lawsuit. However, at the
3 present time my attorneys have counseled me that I
4 cannot provide answers to any questions relevant to
5 this lawsuit, and I must accept this advice or risk
6 losing my Sixth Amendment right to effective
7 representation.

8 Accordingly, I assert my Federal
9 Constitutional right as guaranteed by the Fifth,
10 Sixth, and Fourteenth Amendment to the United States
11 Constitution.

12 Q. Did you engage in sex or sex acts with a
13 female named [REDACTED] (phonetic)?

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

21 Accordingly, I assert my Federal
22 Constitutional right under the Fifth, Sixth, and
23 Fourteenth Amendment of the constitution.

24 Q. Between 2001 and 2005 did you engage in
25 sex or sex acts with a minor female named [REDACTED]

1 (phonetic)?

2 A. I intend to respond to all relevant
3 questions regarding this lawsuit. However, at the
4 present time my attorneys have counseled me that I
5 cannot provide answers to any questions relevant to
6 this lawsuit, and I must accept this advice or risk
7 losing my Sixth Amendment right to effective
8 representation.

9 Accordingly, I assert my Federal
10 Constitutional rights as guaranteed by the Fifth,
11 Sixth, and Fourteenth Amendment to the United States
12 Constitution.

13 Q. Between 2001 and 2005 did you engage in
14 sex or sex acts with a minor named [REDACTED] (phonetic)?

15 A. I intend to respond to all relevant
16 questions regarding this lawsuit. However, at the
17 present time my attorneys have counseled me that I
18 cannot provide answers to any questions relevant to
19 this lawsuit, and I must accept this advice or risk
20 losing my Sixth Amendment right to effective
21 representation.

22 Accordingly, I assert my Federal
23 Constitutional right as guaranteed by the Fifth,
24 Sixth, and Fourteenth Amendment to the United States
25 Constitution.

1 Q. Between 2001 and 2005 did you engage in
2 sex or sex acts with a minor female named [REDACTED]
3 [REDACTED] (phonetic)?

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

11 Accordingly, I assert my Federal
12 Constitutional right as guaranteed by the Fifth,
13 Sixth, and Fourteenth Amendment to the United States
14 Constitution.

15 MR. BURMAN: Mr. Edwards, can I inquire of
16 you one thing? Do you have a RICO count in
17 [REDACTED]'s case?

18 MR. EDWARDS: Yes.

19 MR. BURMAN: Okay. These other girls, are
20 any of them your clients, as well?

21 MR. EDWARDS: Some may be.

22 MR. BURMAN: Okay. Thank you.

23 MR. EDWARDS: Some are not.

24 MR. BURMAN: Okay.

25 Q. (By Mr. Edwards) Between 2001 and 2005

1 Q. Between 2001 and 2005 did you engage in
2 sex or sex acts with a minor female named [REDACTED]
3 (phonetic)?

4 A. I intend to respond to all relevant
5 questions regarding this lawsuit. However, at this
6 time my attorneys have counseled me that I cannot
7 provide answers to any questions relevant to this
8 lawsuit, and I must accept this advice or risk
9 losing my Sixth Amendment right to effective
10 representation.

11 Accordingly, I assert my Federal
12 Constitutional right as guaranteed by the Fifth,
13 Sixth, and Fourteenth Amendment of the United States
14 Constitution.

15 Q. Between 2001 and 2005 did you engage in
16 sex or sex acts with a minor female named [REDACTED]
17 (phonetic)?

18 A. I intend to respond to all relevant
19 questions regarding this lawsuit. However, at the
20 present time my attorneys have counseled me that I
21 cannot provide answers to any questions relevant to
22 this lawsuit, and must accept this advice or risk
23 losing my Sixth Amendment right to effective
24 representation.

25 Accordingly, I assert my Federal

1 did you engage in sex or sex acts with a minor
2 female named [REDACTED] (phonetic)?

3 A. I intend to respond to all relevant
4 questions regarding this lawsuit. However, at the
5 present time my attorneys have counseled me that I
6 cannot provide answers to any questions relevant to
7 this lawsuit, and must accept this advice or risk
8 losing my Sixth Amendment right to effective
9 representation.

10 Accordingly, I assert my Federal
11 Constitutional rights as guaranteed by the Fifth,
12 Sixth, and Fourteenth Amendment to the constitution.

13 Q. Between 2001 and 2005 did you engage in
14 sex or sex acts with a minor female named [REDACTED]
15 (phonetic)?

16 A. I intend to respond to all relevant
17 questions regarding this lawsuit. However, at the
18 present time my attorneys have counseled me that I
19 cannot provide answers to any questions relevant to
20 this lawsuit, and I must accept this advice or risk
21 losing my Sixth Amendment right to effective
22 representation.

23 Accordingly, I assert my Federal
24 Constitutional right as guaranteed by the Fifth,
25 Sixth, and Fourteenth Amendment to the constitution.

1 Constitutional rights as guaranteed by the Fifth,
2 Sixth, and Fourteenth Amendment to the United States
3 Constitution.

4 Q. Between 2001 and 2005 did you engage in
5 sex or sex acts with a minor female named [REDACTED]
6 (phonetic)?

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

14 Accordingly, I assert my Federal
15 Constitutional right under the Fifth, Sixth, and
16 Fourteenth Amendment to the constitution.

17 Q. Between 2001 and 2005 did you engage in
18 sex or sex acts with a minor female named [REDACTED]
19 (phonetic)?

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

1 representation.

2 Accordingly, I assert my Federal
3 Constitutional right as guaranteed by the Fifth,
4 Sixth, and Fourteenth Amendment to the United States
5 Constitution.

6 THE WITNESS: Can we take a break for, a
7 bathroom break, is that okay?

8 THE VIDEOGRAPHER: We're off the record at
9 10:39.

10 (Thereupon, a discussion was had off
11 the record.)

12 THE VIDEOGRAPHER: We're back on the
13 record at 10:44.

14 Q. (By Mr. Edwards) Between 2001 and 2005
15 did you engage in sex or sex acts with a minor
16 female named [REDACTED] (phonetic)?

17 A. I intend to respond to all relevant
18 questions regarding this lawsuit. However, at the
19 present time my attorneys have counseled me that I
20 cannot provide answers to questions relevant to this
21 lawsuit, and I must accept their advice or risk
22 losing my Sixth Amendment right to effective
23 representation.

24 Accordingly, I assert my Federal
25 Constitutional right as guaranteed by the Fifth,

1 Fifth, Sixth, and Fourteenth Amendment to the
2 United States Constitution.

3 Q. (By Mr. Edwards) Between the year 2001
4 and 2005 did you engage in sex or sex acts with a
5 minor female named [REDACTED] (phonetic)?

6 MR. BURMAN: Object to form, vague and
7 indefinite. Last name, please.

8 MR. EDWARDS: You can answer.

9 THE WITNESS: I intend to respond to all
10 relevant questions regarding this lawsuit.

11 However, at the present time my attorneys have
12 counseled me that I cannot provide answers to
13 any questions relevant to this lawsuit. I must
14 accept this advice or risk losing my Sixth
15 Amendment right to effective representation.

16 Accordingly, I assert my Federal
17 Constitutional rights as guaranteed by the
18 Fifth, Sixth and Fourteenth Amendment to the
19 United States Constitution.

20 Q. (By Mr. Edwards) Between 2001 and 2005
21 did you engage in sex or sex acts with a minor
22 female named [REDACTED] (phonetic)?

23 MR. BURMAN: Object to form, vague and
24 indefinite. Last name, please.

25 MR. EDWARDS: You may answer.

1 Sixth and the Fourteenth Amendment to the United
2 States Constitution.

3 THE WITNESS: Can I see you a second,
4 Mike?

5 MR. BURMAN: Sure.

6 THE VIDEOGRAPHER: We're off the record at
7 10:45.

8 (Thereupon, a brief break was taken.)

9 THE VIDEOGRAPHER: Back on the record at
10 10:46.

11 Q. (By Mr. Edwards) Between the year 2001
12 and 2005 did you engage in sex or sex acts with a
13 minor female named [REDACTED] (phonetic)?

14 MR. BURMAN: Object to form, form vague
15 and indefinite. Last name, please.

16 MR. EDWARDS: You can answer the question.

17 THE WITNESS: I intend to respond to all
18 relevant questions regarding this lawsuit.
19 However, at the present time my attorneys have
20 counseled me that I cannot provide answers to
21 any questions relevant to this lawsuit, and
22 must accept this advice or risk losing my Sixth
23 Amendment right to effective representation.

24 Accordingly, I assert my Federal
25 Constitutional right as guaranteed by the

1 THE WITNESS: I intend to respond to all
2 relevant questions regarding this lawsuit.

3 However, at the present time my attorneys have
4 counseled me that I cannot provide answers to
5 any questions relevant to this lawsuit, and
6 must accept this advice or risk losing my Sixth
7 Amendment right to effective representation.

8 Accordingly, I assert my Federal
9 Constitutional right as guaranteed by the
10 Fifth, Sixth and Fourteenth Amendment to the
11 United States constitution.

12 Q. (By Mr. Edwards) Between 2001 and 2005
13 did you engage in sex or sex acts with a minor
14 female named [REDACTED] (phonetic)?

15 MR. BURMAN: Object to the form, vague and
16 indefinite. Last name, please.

17 MR. EDWARDS: You can answer if --

18 THE WITNESS: I intend to respond to all
19 relevant questions regarding this lawsuit.
20 However, at the present time my attorneys have
21 counseled me that I cannot provide answers to
22 any questions relevant to this lawsuit. I must
23 accept this advice or risk losing my Sixth
24 Amendment right to effective representation.

25 Accordingly, I assert my Federal

1 Constitutional right as guaranteed by the
2 Fifth, Sixth and Fourteenth Amendment to the
3 United States Constitution.

4 Q. (By Mr. Edwards) Between 2001 and 2005
5 did you engage in sex or sex acts with a minor
6 female named [REDACTED] (phonetic)?

7 MR. BURMAN: Object to form, vague and
8 indefinite. Last name, please.

9 MR. EDWARDS: You can answer, if you know.

10 THE WITNESS: I intend to respond to all
11 relevant questions regarding this lawsuit.
12 However, at the present time my attorneys have
13 counseled me that I cannot provide answers to
14 any questions relevant to this lawsuit. I must
15 accept this advice or risk losing my Sixth
16 Amendment right to effective representation.

17 Accordingly, I assert my Federal
18 Constitutional right as guaranteed by the
19 Fifth, Sixth, and Fourteenth Amendment to the
20 United States Constitution.

21 Q. (By Mr. Edwards) Between 2001 and 2005
22 did you engage in sex or sex acts with a minor
23 female named [REDACTED] (phonetic)?

24 MR. BURMAN: Object to form, vague and
25 indefinite. Last name, please.

1 Accordingly, I assert my Federal
2 Constitutional right as guaranteed by the
3 Fifth, Sixth, and Fourteenth Amendment to the
4 United States Constitution.

5 Q. (By Mr. Edwards) Between 2001 and 2005
6 did you engage in sex or sex acts with a minor
7 female that you referred to as [REDACTED]
8 (phonetic)?

9 MR. BURMAN: Object to form, vague and
10 indefinite. Last name, please.

11 MR. EDWARDS: You can answer.

12 MR. BURMAN: Or flavor.

13 THE WITNESS: I intend to respond to all
14 relevant questions regarding this lawsuit.
15 However, at the present time my attorneys have
16 counseled me that I cannot provide answers to
17 any questions relevant to this lawsuit, and
18 must accept this advice or risk losing my Sixth
19 Amendment right to effective representation.

20 Accordingly, I assert my Federal
21 Constitutional right as guaranteed by the
22 Fifth, Sixth, and Fourteenth Amendment to the
23 constitution.

24 Q. (By Mr. Edwards) Between 2001 and 2005
25 did you engage in sex or sex acts with a minor

1 MR. EDWARDS: You can answer.

2 THE WITNESS: I intend to respond to all
3 relevant questions regarding this lawsuit.
4 However at the present time my attorneys have
5 counseled me that I cannot provide answers to
6 any questions relevant to this lawsuit, and
7 must accept this advice or risk losing my Sixth
8 Amendment right to effective representation.

9 Accordingly, I assert my Federal
10 Constitutional right as guaranteed by the
11 Fifth, Sixth, and Fourteenth Amendment to the
12 United States Constitution.

13 Q. (By Mr. Edwards) Between 2001 and 2005
14 did you engage in sex or sex acts with a minor
15 female named [REDACTED] (phonetic)?

16 MR. BURMAN: Object to form, vague and
17 indefinite. Last name, please.

18 MR. EDWARDS: You can answer.

19 THE WITNESS: I intend to respond to all
20 relevant questions regarding this lawsuit.
21 However, at the present time my attorneys have
22 counseled me that I cannot provide answers to
23 any questions relevant to this lawsuit, and
24 must accept this advice or risk losing my Sixth
25 Amendment right to effective representation.

1 female named [REDACTED] (phonetic)?

2 MR. BURMAN: Object to form, vague and
3 indefinite. Last name, please.

4 MR. EDWARDS: You can answer.

5 THE WITNESS: I intend to respond to all
6 relevant questions regarding this lawsuit.
7 However, at the present time my attorneys have
8 counseled me that I cannot provide answers to
9 any questions relevant to this lawsuit, and
10 must accept this advice or risk losing my Sixth
11 Amendment right to effective representation.

12 Q. (By Mr. Edwards) Between --

13 THE WITNESS: Sorry?

14 MR. EDWARDS: I didn't realize you weren't
15 finished.

16 THE WITNESS: Accordingly, I assert my
17 Federal Constitutional right as guaranteed by
18 the Fifth, Sixth and Fourteenth Amendment to
19 the United States Constitution.

20 Q. (By Mr. Edwards) Between 2001 and 2005
21 did you engage in sex or sex acts with a 12-year-old
22 girl named [REDACTED] (phonetic)?

23 MR. BURMAN: Object to form, vague and
24 indefinite. Last name, please.

25 MR. EDWARDS: You can answer.

1 THE WITNESS: I intend to respond to all
2 relevant questions regarding this lawsuit.
3 However, at the present time my attorneys have
4 counseled me that I cannot provide answers to
5 any questions relevant to this lawsuit, and
6 must accept this advice or risk losing my Sixth
7 Amendment right to effective representation.

8 Accordingly, I assert my Federal
9 Constitutional right as guaranteed by the
10 Fifth, Sixth, and Fourteenth Amendment to the
11 constitution.

12 Q. (By Mr. Edwards) Between 2001 and 2005
13 did you engage in sex or sex acts with a minor
14 female named [REDACTED] (phonetic)?

15 MR. BURMAN: Object to form, vague and
16 indefinite. Last name, please.

17 MR. EDWARDS: You can answer.

18 THE WITNESS: I intend to respond to all
19 relevant questions regarding this lawsuit.
20 However, at the present time my attorneys have
21 counseled me that I cannot provide answers to
22 any questions relevant to this lawsuit. I must
23 accept their advice or risk losing my Sixth
24 Amendment right to effective representation.

25 Accordingly, I assert my Federal

1 Constitutional right as guaranteed by the
2 Fifth, Sixth and the Fourteenth Amendment to
3 the constitution.

4 Q. (By Mr. Edwards) Between 2001 and 2005
5 did you engage in sex or sex acts with a minor
6 female named [REDACTED] (phonetic)?

7 MR. BURMAN: Object to form, vague and
8 indefinite. Last name, please.

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

17 Accordingly, I assert my Federal
18 Constitutional right as guaranteed by the
19 Fifth, Sixth, and Fourteenth Amendment to the
20 United States Constitution.

21 Q. (By Mr. Edwards) Between 2001 and 2005
22 did you engage in sex or sex acts with a minor
23 female named [REDACTED] (phonetic)?

24 MR. BURMAN: Object to form, vague and
25 indefinite. Last name, please.

1 MR. EDWARDS: You can answer.

2 THE WITNESS: I intend to respond to all
3 relevant questions regarding this lawsuit.
4 However, at the present time my attorneys have
5 counseled me that I cannot provide answers to
6 any questions relevant to this lawsuit, and
7 must accept this advice or risk losing my Sixth
8 Amendment right to effective representation.

9 Accordingly, I assert my Federal
10 Constitutional right as guaranteed by the
11 Fifth, Sixth, and Fourteenth Amendment to the
12 United States Constitution.

13 Q. (By Mr. Edwards) Between 2001 and 2005
14 did you engage in sex or sex acts with a minor
15 female named [REDACTED] (phonetic)?

16 MR. BURMAN: Object to form, vague and
17 indefinite. Last name, please.

18 MR. EDWARDS: You may answer.

19 THE WITNESS: I intend to respond to all
20 relevant questions regarding this lawsuit.
21 However, at the present time my attorneys have
22 counseled me that I cannot provide answers to
23 any questions relevant to this lawsuit, and
24 must accept this advice or risk losing my Sixth
25 Amendment right to effective representation.

1 Accordingly, I assert my Federal
2 Constitutional right as guaranteed by the
3 Fifth, Sixth, and Fourteenth Amendment of the
4 United States Constitution.

5 Q. (By Mr. Edwards) Between 2001 and 2005
6 did you engage in sex or sex acts with a minor
7 female named [REDACTED] (phonetic)?

8 MR. BURMAN: Object to form, vague and
9 indefinite. Last name, please.

10 MR. EDWARDS: You can answer.

11 THE WITNESS: I intend to respond to all
12 relevant questions regarding this lawsuit.
13 However, at the present time my attorneys have
14 counseled me that I cannot provide answers to
15 any questions relevant to this lawsuit, and I
16 must accept this advice or risk losing my Sixth
17 Amendment right to effective representation.

18 Accordingly, I assert my Federal
19 Constitutional right as guaranteed by the
20 Fifth, Sixth, and Fourteenth Amendment to the
21 United States Constitution.

22 MR. GOLDBERGER: One moment.

23 (Thereupon, a discussion was had off
24 the record.)

25 (Thereupon, Attorney Adler entered

1 the deposition room.)
 2 MR. EDWARDS: We're back on.
 3 Q. (By Mr. Edwards) Between 2001 and 2005
 4 did you engage in sex or sex acts with a minor
 5 female named [REDACTED] (phonetic)?
 6 MR. BURMAN: Object to form, vague and
 7 indefinite. Last name, please.
 8 MR. EDWARDS: You can answer.
 9 THE WITNESS: I intend to respond to all
 10 relevant questions regarding this lawsuit.
 11 However, at the present time my attorneys have
 12 counseled me that I cannot provide answers to
 13 any questions relevant to this lawsuit, and
 14 must accept this advice or risk losing my Sixth
 15 Amendment right to effective representation.
 16 Accordingly, I assert my Federal
 17 Constitutional right as guaranteed by the
 18 Fifth, Sixth, and Fourteenth Amendment to the
 19 constitution.
 20 Q. (By Mr. Edwards) Between 2001 and 2005
 21 did you engage in sex or sex acts with a minor
 22 female named [REDACTED] (phonetic)?
 23 MR. BURMAN: Object to form, vague and
 24 indefinite. Last name, please.
 25 MR. EDWARDS: You may answer.

1 THE WITNESS: I intend to respond to all
 2 relevant questions regarding this lawsuit.
 3 However, at the present time my attorneys have
 4 counseled me that I cannot provide answers to
 5 any questions relevant to this lawsuit, and
 6 must accept this advice or risk losing my Sixth
 7 Amendment right to effective representation.
 8 Accordingly, I assert my Federal
 9 Constitutional rights as guaranteed by the
 10 Fifth, Sixth, and the Fourteenth Amendment to
 11 the United States Constitution.
 12 Q. (By Mr. Edwards) Between 2001 and 2005
 13 did you engage in sex or sex acts with a minor
 14 female named [REDACTED] (phonetic)?
 15 MR. BURMAN: Object to form, vague and
 16 indefinite. Last name, please.
 17 MR. EDWARDS: You may answer.
 18 THE WITNESS: I intend to respond to all
 19 relevant questions regarding this lawsuit.
 20 However, at the present time my attorneys have
 21 counseled me that I cannot provide answers to
 22 any questions relevant to this lawsuit, and I
 23 must accept this advice or risk losing my Sixth
 24 Amendment right to effective representation.
 25 Accordingly, I assert my Federal

1 Constitutional rights as guaranteed by the
 2 Fifth, Sixth, and Fourteenth Amendment to the
 3 United States Constitution.
 4 Q. (By Mr. Edwards) Between 2001 and 2005
 5 did you engage in sex or sex acts with a minor
 6 female named [REDACTED] (phonetic)?
 7 MR. BURMAN: Object to the form, vague and
 8 indefinite. Last name, please.
 9 MR. EDWARDS: You can answer.
 10 THE WITNESS: I intend to respond to all
 11 relevant questions regarding this lawsuit.
 12 However, at the present time my attorneys have
 13 counseled me that I cannot provide answers to
 14 any questions relevant to this lawsuit, and
 15 must accept this advice or risk losing my Sixth
 16 Amendment right to effective representation.
 17 Accordingly, I assert my Federal
 18 Constitutional right as guaranteed by the
 19 Fifth, Sixth, and Fourteenth Amendment to the
 20 United States Constitution.
 21 Q. (By Mr. Edwards) Between 2001 and 2005
 22 did you engage in sex or sex acts with a minor
 23 female named [REDACTED] (phonetic)?
 24 MR. BURMAN: Object to form, vague and
 25 indefinite. Last name, please.

1 MR. EDWARDS: You can answer.
 2 THE WITNESS: I intend to respond to all
 3 relevant questions regarding this lawsuit.
 4 However, at the present time my attorneys have
 5 counseled me that I cannot provide answers to
 6 any questions relevant to this lawsuit, and
 7 must accept this advice or risk losing my Sixth
 8 Amendment right to effective representation.
 9 Accordingly, I assert my Federal
 10 Constitutional right as guaranteed by the
 11 Fifth, Sixth, and Fourteenth Amendment to the
 12 United States Constitution.
 13 Q. (By Mr. Edwards) Between 2001 and 2005
 14 did you engage in sex or sex acts with a minor
 15 female named [REDACTED] (phonetic)?
 16 MR. BURMAN: Object to form, vague and
 17 indefinite. And last name, please?
 18 MR. GOLDBERGER: Is that [REDACTED] or
 19 [REDACTED]?
 20 MR. EDWARDS: -- dra.
 21 THE WITNESS: I intend to respond to all
 22 relevant questions regarding this lawsuit.
 23 However, at the present time my attorneys have
 24 counseled me that I cannot provide answers to
 25 any questions relevant to this lawsuit, and

1 must accept this advice or risk losing my Sixth
2 Amendment right to effective representation.

3 Accordingly, I assert my Federal
4 Constitutional right as guaranteed by the
5 Fifth, Sixth, and Fourteenth Amendment to the
6 United States Constitution.

7 Q. (By Mr. Edwards) Between 2001 and 2005
8 did you engage in sex or sex acts with a minor
9 female named [REDACTED] (phonetic)?

10 MR. BURMAN: Object to form, vague and
11 indefinite. Last name, please.

12 MR. EDWARDS: You can answer.

13 THE WITNESS: I intend to respond to all
14 relevant questions regarding this lawsuit.
15 However, at the present time my attorneys have
16 counseled me that I cannot provide answers to
17 any questions relevant to this lawsuit, and I
18 must accept this advice or risk losing my Sixth
19 Amendment right to effective representation.

20 Accordingly, I assert my Federal
21 Constitutional rights as guaranteed by the
22 Fifth, Sixth, and Fourteenth Amendment to the
23 United States Constitution.

24 Q. (By Mr. Edwards) Between 2001 and 2005
25 did you engage in sex or sex acts with a minor

1 any questions relevant to this lawsuit, and
2 must accept this advice or risk losing my Sixth
3 Amendment right to effective representation.

4 Accordingly, I assert my Federal
5 Constitutional right as guaranteed by the
6 Fifth, Sixth, and Fourteenth Amendment to the
7 United States Constitution.

8 Q. (By Mr. Edwards) Between 2001 and 2005
9 did you engage in sex or sex acts with a minor
10 female named [REDACTED] (phonetic)?

11 MR. BURMAN: Object to form, vague and
12 indefinite. Last name, please.

13 MR. EDWARDS: You can answer.

14 THE WITNESS: I intend to respond to all
15 relevant questions regarding this lawsuit.
16 However, at the present time my attorneys have
17 counseled me that I cannot provide answers to
18 any questions relevant to this lawsuit, and I
19 must accept this advice or risk losing my Sixth
20 Amendment right to effective representation.

21 Accordingly, I assert my Federal
22 Constitutional right as guaranteed by the
23 Fifth, Sixth, and Fourteenth Amendment to the
24 United States Constitution.

25 Q. (By Mr. Edwards) Between 2001 and 2005

1 female named [REDACTED] (phonetic)?

2 MR. BURMAN: Object to form, vague and
3 indefinite. Last name, please.

4 MR. EDWARDS: You can answer.

5 THE WITNESS: I intend to respond to all
6 relevant questions regarding this lawsuit.
7 However, at the present time my attorneys have
8 counseled me that I cannot provide answers to
9 any questions relevant to this lawsuit, and I
10 must accept this advice or risk losing my Sixth
11 Amendment right to effective representation.

12 Accordingly, I assert my Federal
13 Constitutional right as guaranteed by the
14 Fifth, Sixth, and Fourteenth Amendment to the
15 United States Constitution.

16 Q. (By Mr. Edwards) Between 2001 and 2005
17 did you engage in sex or sex acts with a minor
18 female named [REDACTED] (phonetic)?

19 MR. BURMAN: Object to form, vague and
20 indefinite. Last name, please.

21 MR. EDWARDS: You can answer.

22 THE WITNESS: I intend to respond to all
23 relevant questions regarding this lawsuit.
24 However, at the present time my attorneys have
25 counseled me that I cannot provide answers to

1 did you engage in sex or sex acts with a minor
2 female named [REDACTED] (phonetic)?

3 MR. BURMAN: Object to form, vague and
4 indefinite. Last name, please.

5 MR. EDWARDS: You can answer.

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

13 Accordingly, I assert my Federal
14 Constitutional right as guaranteed by the
15 Fifth, Sixth, and Fourteenth Amendment of the
16 United States Constitution.

17 Q. (By Mr. Edwards) Between 2001 and 2005
18 did you engage in sex or sex acts with a minor
19 female named [REDACTED] (phonetic)?

20 MR. BURMAN: Object to form, vague and
21 indefinite. Last name, please.

22 MR. EDWARDS: You can answer.

23 THE WITNESS: I intend to respond to all
24 relevant questions regarding this lawsuit.
25 However, at the present time my attorneys have

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

5 Accordingly, I assert my Federal
6 Constitutional right as guaranteed by the
7 Fifth, Sixth, and Fourteenth Amendment to the
8 United States Constitution.

9 Q. (By Mr. Edwards) Between 2001 and 2005
10 did you engage in sex or sex acts with a minor
11 female named [REDACTED]

12 MR. BURMAN: Object to form, vague and
13 indefinite. Last name, please.

14 MR. EDWARDS: You can answer.

15 THE WITNESS: I intend to respond to all
16 relevant questions regarding this lawsuit.

17 However, at the present time my attorneys have
18 counseled me that I cannot provide answers to
19 any questions relevant to this lawsuit, and I
20 must accept this advice or risk losing my Sixth
21 Amendment right to effective representation.

22 Accordingly, I assert my Federal
23 Constitutional right as guaranteed by the
24 Fifth, Sixth, and Fourteenth Amendment to the
25 constitution.

1 Q. (By Mr. Edwards) Isn't it true that at
2 the time you engaged in sex or sex acts with each of
3 the people we have just discussed, you knew they
4 were minors?

5 MR. BURMAN: Object to form.

6 THE WITNESS: I intend to respond to all
7 relevant questions regarding this lawsuit.

8 However, at the present time my attorneys have
9 counseled me that I cannot provide answers to
10 any questions relevant to this lawsuit, and
11 must accept this advice or risk losing my Sixth
12 Amendment right to effective representation.

13 Accordingly, I assert my Federal
14 Constitutional right under the Fifth, Sixth,
15 and Fourteenth Amendment to the United States
16 Constitution.

17 Q. (By Mr. Edwards) With each of these
18 girls, isn't it true that you used someone else to
19 recruit them to your house?

20 MR. BURMAN: Object to form, vague and
21 indefinite.

22 THE WITNESS: I intend to respond to all
23 relevant questions regarding this lawsuit.

24 However, at the present time my attorneys have
25 counseled me that I cannot provide answers to

1 any questions relevant to this lawsuit, and
2 must accept this advice or risk losing my Sixth
3 Amendment right to effective representation.

4 Accordingly, I assert my Federal
5 Constitutional right as guaranteed by the
6 Fifth, Sixth, and Fourteenth Amendment to the
7 United States Constitution.

8 Q. (By Mr. Edwards) For the purposes of
9 these next questions, when I refer to "the minor
10 girls" I'm referring to [REDACTED]

11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 [REDACTED], my client, which is
19 the plaintiff in this lawsuit.

20 My question is --

21 MR. GOLDBERGER: You've identified that
22 [REDACTED] correct?

23 MR. EDWARDS: Correct.

24 Q. (By Mr. Edwards) With each of these
25 girls, isn't it true that you paid somebody else to

1 bring them to your house?

2 MR. BURMAN: Object to the form, vague and
3 indefinite.

4 THE WITNESS: I intend to respond to all
5 relevant questions regarding this lawsuit.

6 However, at the present time my attorneys have
7 counseled me that I cannot provide answers to
8 any questions relevant to this lawsuit, and
9 must accept this advice or risk losing my Sixth
10 Amendment right to effective representation.

11 Accordingly, I assert my Federal
12 Constitutional right as guaranteed by the
13 Fifth, Sixth, and Fourteenth Amendment to the
14 United States Constitution.

15 Q. (By Mr. Edwards) For each of these minor
16 girls, isn't it true that you paid each of them for
17 sex or sex acts?

18 MR. BURMAN: Object to form, vague and
19 indefinite. Further explaining that to the
20 extent that no last names have been identified
21 for most of the girls.

22 MR. EDWARDS: You can answer.

23 THE WITNESS: I intend to respond to all
24 relevant questions regarding this lawsuit.

25 However, at the present time my attorneys have

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

5 Accordingly, I assert my Federal
6 Constitutional right as guaranteed by the
7 Fifth, Sixth, and Fourteenth Amendment to the
8 United States Constitution.

9 Q. (By Mr. Edwards) Isn't it true that in
10 order to recruit each of these minor girls to your
11 house, you had someone tell them, "A rich guy in
12 Palm Beach will pay you cash to go to his house and
13 give him a massage"?

14 MR. BURMAN: Object to form, vague and
15 indefinite, to the extent last names of the
16 girls have not been identified.

17 THE WITNESS: I intend to respond to all
18 relevant questions regarding this lawsuit.
19 However, at the present time my attorneys have
20 counseled me that I cannot provide answers to
21 any questions relevant to this lawsuit. I must
22 accept this advice or risk losing my Sixth
23 Amendment right to effective representation.

24 Accordingly, I assert my Federal
25 Constitutional right as guaranteed by the

1 Fifth, Sixth, and Fourteenth Amendment of the
2 United States Constitution.

3 Q. (By Mr. Edwards) Each of these minor
4 girls, when arriving at your house, was greeted at
5 the door by one of your employees at your mansion,
6 isn't that correct?

7 MR. BURMAN: Object to form, vague and
8 indefinite. No description of last names of
9 the alleged minor girls.

10 THE WITNESS: I intend to respond to all
11 relevant questions regarding this lawsuit.
12 However, at the present time my attorneys have
13 advised me that I cannot provide answers to any
14 questions relevant to this lawsuit, and I must
15 accept this advice or risk losing my Sixth
16 Amendment right to effective representation.

17 Accordingly, I assert my Federal
18 Constitutional right as guaranteed by the
19 Fifth, Sixth, and Fourteenth Amendment to the
20 United States Constitution.

21 Q. (By Mr. Edwards) Each of these minor
22 girls was escorted up to your bedroom by one of your
23 employees, isn't that correct?

24 MR. BURMAN: Object to the form, vague and
25 indefinite.

1 THE WITNESS: I intend to respond to all
2 relevant questions regarding this lawsuit.

3 However, at the present time my attorneys have
4 counseled me that I cannot provide answers to
5 any questions relevant to this lawsuit, and I
6 must accept this advice or risk losing my Sixth
7 Amendment right to effective representation.

8 Accordingly, I assert my Federal
9 Constitutional rights as guaranteed by the
10 Fifth, Sixth, and Fourteenth Amendment to the
11 United States Constitution.

12 May I just ask, step outside for a second,
13 I want to just ask a question.

14 MR. BURMAN: Sure.

15 THE VIDEOGRAPHER: Going off the record at
16 11:11.

17 (Thereupon, a brief break was taken.)

18 THE VIDEOGRAPHER: Okay, we're back on the
19 record at 11:16.

20 Q. (By Mr. Edwards) Previously I named, or I
21 gave you the names of 49 minor girls. Isn't it true
22 that you engaged in sex or sex acts with each of
23 them?

24 MR. BURMAN: Object to the form, vague and
25 indefinite. Last names weren't provided for

1 most of them.

2 THE WITNESS: I intend to respond to all
3 relevant questions regarding this lawsuit.
4 However, at the present time my attorneys have
5 counseled me that I cannot provide answers to
6 any questions relevant to this lawsuit, and
7 must accept that advice or risk losing my Sixth
8 Amendment right to effective representation.

9 Accordingly, I assert my Federal
10 Constitutional right as guaranteed by the
11 Fifth, Sixth, and Fourteenth Amendment to the
12 constitution.

13 Q. (By Mr. Edwards) With respect to each of
14 the minor girls that was taken into your bedroom by
15 one of your employees, isn't it true that you
16 entered the room wearing only a towel?

17 MR. BURMAN: Object to form, vague and
18 indefinite, last names of the alleged minor
19 girls weren't provided.

20 THE WITNESS: I intend to respond to all
21 relevant questions regarding this lawsuit.
22 However, at the present time my attorneys have
23 counseled me that I cannot provide answers to
24 any questions relevant to this lawsuit, and
25 must accept this advice or risk losing my Sixth

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

6 Q. (By Mr. Edwards) With respect to each of
7 these minor girls, isn't it true that you ordered
8 each of them to get naked to give you a massage?

9 MR. BURMAN: Object to form, vague and
10 indefinite with regard to the alleged minor
11 girls, the names weren't provided. Last names
12 weren't provided.

13 MR. EDWARDS: You can answer.

14 THE WITNESS: I intend to respond to all
15 relevant questions regarding this lawsuit.
16 However, at the present time my attorneys have
17 counseled me that I cannot provide answers to
18 any questions relevant to this lawsuit, and I
19 must accept this advice or risk losing my Sixth
20 Amendment right to effective representation.

21 Accordingly, I assert my Federal
22 Constitutional right as guaranteed by the
23 Fifth, Sixth, and Fourteenth Amendment to the
24 United States Constitution.

25 Q. (By Mr. Edwards) With respect to each of

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

6 Accordingly, I assert my Federal
7 Constitutional rights as guaranteed by the
8 Fifth, Sixth, and Fourteenth Amendment to the
9 United States Constitution.

10 Q. (By Mr. Edwards) With respect to all of
11 the named 49 minor girls, isn't it true that you
12 tried to touch each of them in a sexual way?

13 MR. BURMAN: Object to form, vague and
14 indefinite with regard to the alleged minor
15 girls, last names weren't provided.

16 THE WITNESS: I intend to respond to all
17 relevant questions regarding this lawsuit.
18 However, at the present time my attorneys have
19 counseled me that I cannot provide answers to
20 any questions relevant to this lawsuit. I must
21 accept this advice or risk losing my Sixth
22 Amendment right to effective representation.

23 Accordingly, I assert my Federal
24 Constitutional rights as guaranteed by the
25 Fifth, Sixth, and Fourteenth Amendment to the

1 the 49 named minor girls, isn't it true that you
2 masturbated in front of each of them?

3 MR. BURMAN: Object to the form, vague and
4 indefinite with regard to the alleged minor
5 girls, their last names weren't provided.

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

14 Accordingly, I assert my Federal
15 Constitutional rights as guaranteed by the
16 Fifth, Sixth, and Fourteenth Amendment to the
17 United States Constitution.

18 Q. (By Mr. Edwards) Isn't it true that you
19 asked each of the minor girls to do similar things
20 to you, such as rub your nipples?

21 MR. BURMAN: Object to the form, vague and
22 indefinite with regard to the alleged minor
23 girls, the last names weren't provided.

24 THE WITNESS: I intend to respond to all
25 relevant questions regarding this lawsuit.

1 United States Constitution.

2 Q. (By Mr. Edwards) With respect to each of
3 the 49 minor girls, isn't it true that you touched
4 their bare breasts?

5 MR. BURMAN: Object to form, vague and
6 indefinite with regard to the alleged minor
7 girls, last names weren't provided.

8 THE WITNESS: I intend to respond to all
9 relevant questions regarding this lawsuit.
10 However, at the present time my attorneys have
11 counseled me that I cannot provide answers to
12 any questions relevant to this lawsuit. And I
13 must accept this advice or risk losing my Sixth
14 Amendment right to effective representation.

15 Accordingly, I assert my Federal
16 Constitutional right as guaranteed by the
17 Fifth, Sixth, and Fourteenth Amendment to the
18 United States Constitution.

19 Q. (By Mr. Edwards) With respect to each of
20 these 49 minor girls, isn't it true that you
21 inserted your fingers into their vaginas?

22 MR. BURMAN: Object to form of the
23 question, vague and indefinite with regard to
24 the alleged minor girls, last names weren't
25 provided.

1 THE WITNESS: I intend to respond to all
 2 relevant questions regarding this lawsuit.
 3 However, at the present time my attorneys have
 4 counseled me that I cannot provide answers to
 5 any questions relevant to this lawsuit, and I
 6 must accept this advice or risk losing my Sixth
 7 Amendment right to effective representation.

8 Accordingly, I assert my Federal
 9 Constitutional rights as guaranteed by the
 10 Fifth, Sixth, and Fourteenth Amendment to the
 11 United States Constitution.

12 Q. (By Mr. Edwards) With respect to the 49
 13 named minor girls, isn't it true that you attempted
 14 to use vibrators on each of them?

15 MR. BURMAN: Object to the form of the
 16 question, vague and indefinite with regard to
 17 the alleged minor girls, last names weren't
 18 provided.

19 MR. EDWARDS: You can answer.

20 THE WITNESS: I intend to respond to all
 21 relevant questions regarding this lawsuit.
 22 However, at the present time my attorneys have
 23 counseled me that I cannot provide answers to
 24 any questions relevant to this lawsuit, and I
 25 must accept this advice or risk losing my Sixth

1 this lawsuit, and I must accept this advice or risk
 2 losing my Sixth Amendment right to effective
 3 representation.

4 Accordingly, I assert my Federal
 5 Constitutional rights as guaranteed by the Fifth,
 6 Sixth, and Fourteenth Amendment to the United States
 7 Constitution.

8 Q. Can you tell me why it is that you just
 9 smiled when I asked you the last question about
 10 [REDACTED]?

11 MR. GOLDBERGER: Don't answer that.

12 Q. (By Mr. Edwards) Did you think the
 13 question was funny?

14 MR. BURMAN: Object to form.

15 MR. GOLDBERGER: You can answer.

16 THE WITNESS: No.

17 Q. (By Mr. Edwards) Do you know [REDACTED]
 18 [REDACTED]?

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

1 Amendment right to effective representation.

2 Accordingly, I assert my Federal
 3 Constitutional rights as guaranteed by the
 4 Fifth, Sixth, and Fourteenth Amendment to the
 5 United States Constitution.

6 Q. (By Mr. Edwards) Between 2001 and 2005
 7 did you have a woman named [REDACTED] living
 8 at your Palm Beach house with you?

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

16 Accordingly, I assert my Federal
 17 Constitutional right as guaranteed by the Fifth,
 18 Sixth, and Fourteenth Amendment to the United States
 19 Constitution.

20 Q. Is it true that you considered [REDACTED]
 21 [REDACTED] your Yugoslavian lesbian sex slave?

22 A. I intend to respond to all relevant
 23 questions regarding this lawsuit. However, at the
 24 present time my attorneys have counseled me that I
 25 cannot provide answers to any questions relevant to

1 Accordingly, I assert my Federal
 2 Constitutional rights as guaranteed by the Fifth,
 3 Sixth, and Fourteenth Amendment to the United States
 4 Constitution.

5 Q. Isn't it true that you brought [REDACTED] into
 6 the room to have threesome sex with you and many of
 7 these minor female girls?

8 MR. BURMAN: Object to the form of the
 9 question, vague and indefinite with regard to
 10 the word "may" and with regard to the fact that
 11 last names haven't been described, or
 12 disclosed.

13 THE WITNESS: I intend to respond to all
 14 relevant questions regarding this lawsuit.
 15 However, at the present time my attorneys have
 16 counseled me that I cannot provide answers to
 17 any questions relevant to this lawsuit, and I
 18 must accept this advice or risk losing my Sixth
 19 Amendment right to effective representation.

20 Accordingly, I assert Federal
 21 Constitutional rights as guaranteed by the
 22 Fifth, Sixth, and Fourteenth Amendment to the
 23 United States Constitution.

24 Q. (By Mr. Edwards) Isn't it true that you
 25 ejaculated in front of each of these minor girls?

1 MR. BURMAN: Object to form, vague and
2 indefinite. Last names were not provided of
3 the alleged minor girls.

4 THE WITNESS: I intend to respond to all
5 relevant questions regarding this lawsuit.
6 However, at the present time my attorneys have
7 counseled me that I cannot provide answers to
8 any questions relevant to this lawsuit, and I
9 must accept this advice or risk losing my Sixth
10 Amendment right to effective representation.

11 Accordingly, I assert my Federal
12 Constitutional rights as guaranteed by the
13 Fifth, Sixth, and Fourteenth Amendment to the
14 United States Constitution.

15 Q. (By Mr. Edwards) With respect to each of
16 these 49 minor girls, isn't it true that you paid
17 each of them for sex?

18 MR. BURMAN: Object to the form, vague and
19 indefinite. Last names of the many of the
20 minor girls were not provided, alleged minor
21 girls.

22 THE WITNESS: I intend to respond to all
23 relevant questions regarding this lawsuit.
24 However, at the present time my attorneys have
25 counseled me that I cannot provide answers to

1 any questions relevant to this lawsuit, and I
2 must accept this advice or risk losing my Sixth
3 Amendment right to effective representation.

4 Accordingly, I assert my Federal
5 Constitutional rights as guaranteed by the
6 Fifth, Sixth, and Fourteenth Amendment to the
7 United States Constitution.

8 Q. (By Mr. Edwards) Isn't it true that you
9 offered each of the 49 minor girls money if she
10 would bring you more minor girls for you to engage
11 in sex or sex acts with?

12 MR. BURMAN: Object to the form, vague and
13 indefinite. Last names of many of the alleged
14 minor girls weren't provided.

15 THE WITNESS: I intend to respond to all
16 relevant questions regarding this lawsuit.
17 However, at the present time my attorneys have
18 counseled me that I cannot provide answers to
19 any questions relevant to this lawsuit, and
20 must accept their advice or risk losing my
21 Sixth Amendment right to effective
22 representation.

23 Accordingly, I assert my Federal
24 Constitutional rights as guaranteed by the
25 Fifth, Sixth, and Fourteenth Amendment to the

1 United States Constitution.

2 Q. (By Mr. Edwards) With respect to each of
3 the 49 named minor girls, isn't it true that the sex
4 or sex acts occurred in your bedroom?

5 MR. BURMAN: Object to form of the
6 question, vague and indefinite with regard to
7 the alleged minor girls, the last names weren't
8 provided.

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

16 Accordingly, I assert my Federal
17 Constitutional right as guaranteed by the
18 Fifth, Sixth, and Fourteenth Amendment to the
19 United States Constitution.

20 Q. (By Mr. Edwards) With respect to each of
21 these minor girls, isn't it true that certain other
22 employees of yours played a role in furthering your
23 sexual contact with these minors?

24 MR. BURMAN: Object to the form of the
25 question, vague and indefinite with regard to

1 the alleged minors, last names weren't
2 provided.

3 THE WITNESS: Could you repeat the
4 question? Sorry.

5 Q. (By Mr. Edwards) Sure.

6 With respect to the 49 minor girls whose
7 names I provided, isn't it true that certain
8 employees of yours played a role in furthering
9 sexual contact between you and these minors?

10 MR. BURMAN: Same objection.

11 THE WITNESS: I intend to respond to all
12 relevant questions regarding this lawsuit.
13 However, at the present time my attorneys have
14 counseled me that I cannot provide answers to
15 any questions relevant to this lawsuit, and I
16 must accept this advice or risk losing my Sixth
17 Amendment right to effective representation.

18 Accordingly, I assert my Federal
19 Constitutional rights as guaranteed by the
20 Fifth, Sixth, and Fourteenth Amendment to the
21 United States Constitution.

22 Q. (By Mr. Edwards) Some of your employees
23 were delegated the responsibility of cleaning your
24 sex toys after you engaged in sex with minor girls,
25 isn't that true?

1 MR. BURMAN: Are you referring to the 49
2 alleged minors that you just identified, or is
3 this a generic question?

4 MR. EDWARDS: Yes, the 49, that --

5 THE WITNESS: Can you repeat the question
6 please?

7 MR. EDWARDS: -- are known to us.

8 MR. BURMAN: Okay. Object to the form,
9 vague and indefinite with regard to the alleged
10 minors, last names weren't provided.

11 THE WITNESS: I intend to respond to all
12 relevant questions regarding this lawsuit.
13 However, at the present time my attorneys have
14 counseled me that I cannot provide answers to
15 any questions relevant to this lawsuit, and I
16 must accept this advice or risk losing my Sixth
17 Amendment right to effective representation.

18 Accordingly, I assert my Federal
19 Constitutional right as guaranteed by the
20 Fifth, Sixth, and Fourteenth Amendment to the
21 United States Constitution.

22 Q. (By Mr. Edwards) Isn't it true that you
23 hired employees to work for you for the sole purpose
24 of scheduling minor girls to come to your house for
25 sex?

1 Q. (By Mr. Edwards) Isn't it true that you
2 had employees working for you with a purpose of
3 helping you to avoid detection of your criminal
4 activities by law enforcement?

5 MR. BURMAN: Object to form, vague an
6 indefinite.

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

14 Accordingly, I assert my Federal
15 Constitutional rights as guaranteed by the
16 Fifth, Sixth, and Fourteenth Amendment to the
17 United States Constitution.

18 Q. (By Mr. Edwards) Did you have operable
19 surveillance equipment inside your house from 2001
20 through 2006 in your Palm Beach house?

21 MR. BURMAN: Objection, vague and
22 indefinite.

23 THE WITNESS: I intend to respond to all
24 relevant questions regarding this lawsuit.
25 However, at this present time my attorney has

1 MR. BURMAN: Once again, are you referring
2 to the 49 you identified, or just generic?

3 MR. EDWARDS: General question.

4 MR. BURMAN: General question?

5 MR. EDWARDS: Right.

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

13 Accordingly, I assert my Federal
14 Constitutional rights as guaranteed by the
15 Fifth, Sixth, and Fourteenth Amendment to the
16 United States Constitution.

17 Q. (By Mr. Edwards) Isn't it true that you
18 hired employees that were delegated responsibilities
19 in order to assist you in avoiding detection of your
20 actions by law enforcement?

21 THE WITNESS: What's the question?

22 MR. BURMAN: Object to the form, vague and
23 indefinite.

24 THE WITNESS: Could you repeat it again?

25 MR. EDWARDS: Sure, I'll clean it up.

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

5 Accordingly, I assert my Federal
6 Constitutional rights as guaranteed by the
7 Fifth, Sixth, and Fourteenth Amendment to the
8 United States Constitution.

9 Q. (By Mr. Edwards) Did you destroy or
10 tamper with evidence, including computer images,
11 computer equipment, surveillance equipment, photos,
12 notes, diaries, or photocopy records as a result of
13 the criminal investigation of you between 2001 and
14 2006?

15 MR. GOLDBERGER: Let me object on the
16 form. Are you asking, are you suggesting that
17 there is a criminal investigation that went on
18 between 2001 and 2006? Is that the question?

19 MR. EDWARDS: Well, at some time, at some
20 point in time there was, since he pled guilty.

21 MR. GOLDBERGER: But what's the purpose of
22 the 2001 to 2006? Maybe you can rephrase the
23 question.

24 MR. EDWARDS: Okay.

25 Q. (By Mr. Edwards) How about this. Have

1 you ever at any time destroyed or tampered with any
2 evidence of your involvement with minor girls?

3 A. I intend to respond to all relevant
4 questions regarding this lawsuit. However, at the
5 present time my attorneys have counseled me that I
6 cannot answer questions with respect to this
7 lawsuit, and must accept their advice or risk losing
8 my Sixth Amendment right to effective
9 representation.

10 Accordingly, I assert my Federal
11 Constitutional Rights as guaranteed by the Fifth,
12 Sixth, and Fourteenth Amendments to the United
13 States Constitution.

14 Q. Have you ever destroyed computer images or
15 computer equipment because of a fear it would be
16 used against you in a prosecution for your sexual
17 involvement with minor girls?

18 A. I intend to respond to all relevant
19 questions regarding this lawsuit. However, at the
20 present time my attorneys have counseled me that I
21 cannot provide answers to any questions relevant to
22 this lawsuit, and I must accept this advice or risk
23 losing my Sixth Amendment right to effective
24 representation.

25 Accordingly, I assert my Federal

1 losing my Sixth Amendment right to effective
2 representation.

3 Accordingly, I assert my Federal
4 Constitutional rights as guaranteed by the Fifth,
5 Sixth, and Fourteenth Amendment to the United States
6 Constitution.

7 Q. Was your house at some point in time in
8 Palm Beach burglarized by a former housekeeper named
9 Juan Allessee (phonetic)?

10 A. Yes.

11 Q. In relation to that burglary, did you
12 provide the Palm Beach Police Department with
13 surveillance video from the inside of your house?

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

21 Accordingly, I assert my Federal
22 Constitutional rights as guaranteed by the Fifth,
23 Sixth, and Fourteenth Amendment to the United States
24 Constitution.

25 Q. At the time your house was burglarized,

1 Constitutional rights as guaranteed by the Fifth,
2 Sixth, and Fourteenth Amendment to the United States
3 Constitution.

4 Q. Did you ever, at any time, destroy
5 photographs, notes, or diaries in an effort to avoid
6 detection by law enforcement?

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

14 Accordingly, I assert my Federal
15 Constitutional rights as guaranteed by the Fifth,
16 Sixth, and Fourteenth Amendment to the United States
17 Constitution.

18 Q. Did other people hired by you destroy or
19 tamper with evidence in an effort to avoid detection
20 of criminal activities or prosecution?

21 A. I intend to respond to all relevant
22 questions regarding this lawsuit. However, at the
23 present time my attorneys have counseled me that I
24 cannot provide answers to any questions relevant to
25 this lawsuit, and I must accept this advice or risk

1 how many operable surveillance cameras were inside
2 your house?

3 A. I intend to respond to all relevant
4 questions regarding this lawsuit. However, at the
5 present time my attorneys have counseled me that I
6 cannot provide answers to any questions relevant to
7 this lawsuit, and I must accept this advice or risk
8 losing my Sixth Amendment right to effective
9 representation.

10 Accordingly, I assert my Federal
11 Constitutional rights as guaranteed by the Fifth,
12 Sixth, and Fourteenth Amendment to the United States
13 Constitution.

14 Q. How long have you been on work release?

15 MR. GOLDBERGER: Hang on. Yeah, he can --
16 that's fine.

17 THE WITNESS: A little over six months.

18 Q. (By Mr. Edwards) You know the date that
19 you started work release?

20 A. No.

21 Q. If the court records indicate that your
22 guilty plea occurred on June 30th, 2008, is that
23 something you'd quarrel with?

24 A. No.

25 Q. How long did you, do you believe you were

1 in the county jail after that June 30th, 2008 plea
2 before you were granted work release?

3 MR. GOLDBERGER: If you know.

4 THE WITNESS: Couple of months.

5 Q. (By Mr. Edwards) Do you know if any of
6 your victims were informed of your petition for work
7 release?

8 A. I do not know.

9 Q. When was the Florida Science Foundation
10 created?

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

18 Accordingly, I assert my Federal
19 Constitutional rights as guaranteed by the Fifth,
20 Sixth, and Fourteenth Amendment to the United States
21 Constitution.

22 Q. Isn't it true that you created the Florida
23 Science Foundation months before pleaing guilty
24 knowing that you would eventually be on work release
25 in an office right next to your attorney's office?

1 MR. BURMAN: Object to the form.

2 THE WITNESS: I intend to respond to all
3 relevant questions regarding this lawsuit.
4 However, at the present time my attorneys have
5 counseled me that I cannot provide answers to
6 any questions relevant to this lawsuit, and
7 must accept this advice or risk losing my Sixth
8 Amendment right to effective representation.

9 Accordingly, I assert my Federal
10 Constitutional rights as guaranteed by the
11 Fifth, Sixth, and Fourteenth Amendment to the
12 constitution.

13 Q. (By Mr. Edwards) Since being sentenced in
14 June of 2008, have you had contact with any minors?

15 MR. GOLDBERGER: You can answer that.

16 THE WITNESS: I intend to respond to all
17 relevant questions regarding this lawsuit.
18 However, at the present time my attorneys have
19 counseled me that I cannot provide answers to
20 any questions relevant to this lawsuit, and
21 must accept this advice or risk losing my Sixth
22 Amendment right to effective representation.

23 Accordingly, I assert my Federal
24 Constitutional rights as guaranteed by the
25 Fifth, Sixth and Fourteenth Amendment to the

1 constitution.

2 Q. (By Mr. Edwards) Do you currently have
3 access to a computer that you use?

4 A. I intend to respond to all relevant
5 questions regarding this lawsuit. However, at the
6 present time my attorneys have counseled me that I
7 cannot provide answers to any questions relevant to
8 this lawsuit. I must accept this advice or risk
9 losing my Sixth Amendment right to effective
10 representation.

11 Accordingly, I assert my Federal
12 Constitutional rights as guaranteed by the Fifth,
13 Sixth, and Fourteenth Amendment to the constitution.

14 Q. What is e-mail address that you have been
15 using since being sentenced in 2008?

16 MR. GOLDBERGER: Object to the form,
17 assumes facts not in evidence.

18 THE WITNESS: I intend to respond to all
19 relevant questions regarding this lawsuit.
20 However, at the present time my attorneys have
21 counseled me that I cannot provide answers to
22 any questions relevant to this lawsuit, and I
23 must accept this advice or risk losing my Sixth
24 Amendment right to effective representation.

25 Accordingly, I assert my Federal

1 Constitutional rights as guaranteed by the
2 Fifth, Sixth, and Fourteenth Amendment to the
3 United States Constitution.

4 Q. (By Mr. Edwards) Do you intend to
5 communicate with any minors once you are released to
6 house arrest?

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

14 Accordingly, I assert my Federal
15 Constitutional rights as guaranteed by the Fifth,
16 Sixth, and Fourteenth Amendment to the United States
17 Constitution.

18 Q. Is it true that you have been diagnosed by
19 a psychologist with a sexual disorder related to
20 your sexual appetite for minor girls?

21 A. I intend to respond to all relevant
22 questions regarding this lawsuit. However, at the
23 present time my attorneys have counseled me that I
24 cannot provide answers to any questions relevant to
25 this lawsuit, and I must accept this advice or risk

1 losing my Sixth Amendment right to effective
2 representation.

3 Accordingly, I assert my Federal
4 Constitutional rights as guaranteed by the Fifth,
5 Sixth, and Fourteenth Amendment to the constitution.

6 Q. Isn't it true that you intend to continue
7 engaging in sex acts with minor girls once you are
8 released?

9 MR. BURMAN: Object to the form.

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

17 Accordingly, I assert my Federal
18 Constitutional rights as guaranteed by the
19 Fifth, Sixth, and Fourteenth Amendment to the
20 United States Constitution.

21 Q. (By Mr. Edwards) Have you engaged in sex
22 or sex acts with minor girls outside of the United
23 States?

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

1 Q. (By Mr. Edwards) Have you engaged in sex
2 or sex acts with minors on the island of Little
3 St. Jeff's?

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

11 Accordingly, I assert my Federal
12 Constitutional rights as guaranteed by the Fifth,
13 Sixth, and Fourteenth Amendment to the United States
14 Constitution.

15 Q. Isn't it true that you have engaged in
16 sexual acts or sex with girls as young as 12 years
17 old?

18 A. I intend to respond to all relevant
19 questions regarding this lawsuit. However, at the
20 present time my attorneys have counseled me that I
21 cannot provide answers to any questions relevant to
22 this lawsuit, and I must accept this advice or risk
23 losing my Sixth Amendment right to effective
24 representation.

25 Accordingly, I assert my Federal

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

6 Accordingly, I assert my Federal
7 Constitutional rights as guaranteed by the Fifth,
8 Sixth, and Fourteenth Amendment to the United States
9 Constitution.

10 Q. Is it true that you have your own island?

11 MR. BURMAN: Object, also on the, on the
12 grounds that the punitive damages haven't been
13 allowed yet. Not relevant.

14 MR. EDWARDS: Answer.

15 THE WITNESS: I intend to respond to all
16 relevant questions regarding this lawsuit.
17 However, at the present time my attorneys have
18 counseled me that I cannot provide answers to
19 any questions relevant to this lawsuit, and I
20 must accept this advice or risk losing my Sixth
21 Amendment right to effective representation.

22 Accordingly, I assert my Federal
23 Constitutional rights under the Fifth, Sixth,
24 and Fourteenth Amendment to the United States
25 Constitution.

1 Constitutional rights as guaranteed by the Fifth,
2 Sixth, and Fourteenth Amendment to the United States
3 Constitution.

4 Q. What is the youngest girl that you have
5 engaged in sex or sex acts with in the last ten
6 years?

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

14 Accordingly, I assert under the Federal
15 Constitutional rights as guaranteed by the Fifth,
16 Sixth and Fourteenth Amendment to the United States
17 Constitution.

18 Q. Have you discussed with any of your
19 friends the fact that you engage in sex or sex acts
20 with minors?

21 A. I intend to respond to all relevant
22 questions regarding this lawsuit. However, at the
23 present time my attorneys have counseled me that I
24 cannot provide answers to any questions relevant to
25 this lawsuit, and I must accept this advice or risk

1 losing my Sixth Amendment right to effective
 2 representation.
 3 Accordingly, I assert my Federal
 4 Constitutional rights as guaranteed by the Fifth,
 5 Sixth, and Fourteenth Amendment to the United States
 6 Constitution.
 7 Q. Did you know that the girls that were
 8 providing you massages were under the age of 18 at
 9 the time they were doing so?
 10 A. I intend to respond to all relevant
 11 questions regarding this lawsuit. However, at the
 12 present time my attorneys have counseled me that I
 13 cannot provide answers to any questions relevant to
 14 this lawsuit, and I must accept their advice or risk
 15 losing my Sixth Amendment right to effective
 16 representation.
 17 Accordingly, I assert my Federal
 18 Constitutional rights as guaranteed by the Fifth,
 19 Sixth, and Fourteenth Amendment to the United States
 20 Constitution.
 21 Q. Isn't it true that the age group that you
 22 enjoy to engage in sex with is between 12 and 16
 23 years old?
 24 MR. BURMAN: Object to form.
 25 THE WITNESS: I intend to respond to all

1 Amendment right to effective representation.
 2 Accordingly, I assert my Federal
 3 Constitutional rights as guaranteed by the
 4 Fifth, Sixth, and Fourteenth Amendment to the
 5 United States Constitution.
 6 Q. (By Mr. Edwards) Isn't it true that you
 7 devised a scheme or plan to engage in sex or sex
 8 acts with multiple minor girls?
 9 A. I intend to respond to all relevant
 10 questions regarding this lawsuit. However, at the
 11 present time my attorneys have counseled me that I
 12 cannot provide answers to any questions relevant to
 13 this lawsuit, and I must accept this advice or risk
 14 losing my Sixth Amendment right to effective
 15 representation.
 16 Accordingly, I must assert my Federal
 17 Constitutional rights as guaranteed by the Fifth,
 18 Sixth, and Fourteenth Amendment to the United States
 19 Constitution.
 20 THE WITNESS: Can I take a pee break?
 21 THE VIDEOGRAPHER: We're off the record at
 22 11:50. This will be the end of tape one.
 23 (Thereupon, a brief break was taken.)
 24 THE VIDEOGRAPHER: This is the beginning
 25 of tape number two, and we're back on the

1 relevant questions regarding this lawsuit.
 2 However, at the present time my attorneys have
 3 counseled me that I cannot provide answers to
 4 any questions relevant to this lawsuit, and I
 5 must accept this advice or risk losing my Sixth
 6 Amendment right to effective representation.
 7 Accordingly, I assert my Federal
 8 Constitutional rights as guaranteed by the
 9 Fifth, Sixth, and Fourteenth Amendment to the
 10 constitution.
 11 Q. (By Mr. Edwards) Do you agree with the
 12 laws that prohibit you from having sex or engaging
 13 in sex acts with minors?
 14 MR. BURMAN: Object to form.
 15 THE WITNESS: Can you repeat the question?
 16 Q. (By Mr. Edwards) Do you agree with the
 17 laws that prohibit you from engaging in sex or sex
 18 acts with minor girls?
 19 MR. BURMAN: Object to the form.
 20 THE WITNESS: I intend to respond to all
 21 relevant questions regarding this lawsuit.
 22 However, at the present time my attorneys have
 23 counseled me that I cannot provide answers to
 24 any questions relevant to this lawsuit, and I
 25 must accept this advice or risk losing my Sixth

1 record at 11:59.
 2 Q. (By Mr. Edwards) Between 2001 and 2005
 3 did you digitally penetrate the vaginas of more than
 4 50 minor girls?
 5 A. I intend to respond to all relevant
 6 questions regarding this lawsuit. However, at the
 7 present time my attorneys have counseled me that I
 8 cannot provide answers to any questions relevant to
 9 this lawsuit, and I must accept their advice or risk
 10 losing my Sixth Amendment right to effective
 11 representation.
 12 Accordingly, I assert my Federal
 13 Constitutional right as guaranteed by the Fifth,
 14 Sixth and Fourteenth Amendment to the constitution.
 15 Q. Between 2001 and 2005 did you masturbate
 16 in front of more than 50 minor girls?
 17 A. I intend to respond to all relevant
 18 questions regarding this lawsuit. However, at the
 19 present time my attorneys have counseled me that I
 20 cannot provide answers to any questions relevant to
 21 this lawsuit, and I must accept this advice or risk
 22 losing my Sixth Amendment right to effective
 23 representation.
 24 Accordingly, I assert my Federal
 25 Constitutional rights as guaranteed by the Fifth,

1 Sixth and Fourteenth Amendment to the constitution.

2 Q. Between 2001 and 2005 did you ejaculate in
3 front of more than 50 minor girls?

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

11 Accordingly, I assert my Federal
12 Constitutional rights as guaranteed by the Fifth,
13 Sixth, and Fourteenth Amendment to the United States
14 Constitution.

15 Q. Does the body form of a 12 to 16 year old
16 girl sexually appeal to you?

17 MR. BURMAN: Object to the form.

18 THE WITNESS: I intend to respond to all
19 relevant questions regarding this lawsuit.
20 However, at the present time my attorneys have
21 counseled me that I cannot provide answers to
22 any questions relevant to this lawsuit, and I
23 must accept this advice or risk losing my Sixth
24 Amendment right to effective representation.

25 Accordingly, I assert my Federal

1 Constitutional right as guaranteed by the
2 Fifth, Sixth, and Fourteenth Amendment to the
3 constitution.

4 Q. (By Mr. Edwards) Did you use your wealth,
5 power, and connections to impress or influence minor
6 girls into having sex with you?

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

14 Accordingly, I assert my Federal
15 Constitutional rights as guaranteed by the Fifth,
16 Sixth, and Fourteenth Amendment to the United States
17 Constitution.

18 Q. Did you intentionally target economically
19 deprived children for the purposes of having sex or
20 engaging in sex acts with?

21 A. Do you want to rephrase the question?

22 Q. Did you intentionally target economically
23 deprived children for the purposes of sex?

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

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

6 Accordingly, I assert my Federal
7 Constitutional rights as guaranteed by the Fifth,
8 Sixth, and Fourteenth Amendment to the United States
9 Constitution.

10 Q. During the criminal investigation there
11 were statements to the media that you believed the
12 girls to be 18. Which girls were you referring to?

13 A. I intend to --

14 THE WITNESS: Excuse me one second.
15 (Thereupon, a discussion was had off
16 the record.)

17 MR. GOLDBERGER: Umm, let me object to the
18 form as to vague. I don't know what statements
19 you're talking about. Are you talking about
20 statements that Mr. Epstein made?

21 MR. EDWARDS: Through attorneys.

22 MR. GOLDBERGER: Well, is that the
23 question? Why don't you rephrase the question,
24 why don't you rephrase the question so we
25 understand what it is.

1 Q. (By Mr. Edwards) Various attorneys of
2 yours made representations to the media that you
3 were of, under the belief that the girls that you
4 were engaging in sex acts with were 18 years of age.
5 Which girls were you, was that referring to?

6 MR. GOLDBERGER: Can you identify a
7 specific statement made by a specific attorney?

8 MR. EDWARDS: We'll get there later on in
9 the deposition.

10 Q. (By Mr. Edwards) Have you ever, at any
11 time, made that statement, that you believed the
12 girls that you were engaging in sex acts with were
13 18 years of age or older?

14 MR. GOLDBERGER: To the media, are you
15 talking about?

16 Q. (By Mr. Edwards) Yourself or through
17 anyone else to anyone else.

18 MR. GOLDBERGER: Object to the --
19 that's --

20 MR. BURMAN: Object to the form.

21 MR. GOLDBERGER: I have no idea what the
22 question is. Just ask the question, I'll be
23 happy to try and have the client answer it for
24 you.

25 Q. (By Mr. Edwards) Okay. I'm not talking

1 about statements to your attorneys, that's
2 privileged.

3 Have you ever made the statement to anyone
4 else, other than your attorneys, that you believed
5 the girls that were giving you massages at your
6 house were over the age of 18?

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

14 Accordingly, I assert my Federal
15 Constitutional rights as guaranteed by the Fifth,
16 Sixth, and Fourteenth Amendment to the United States
17 Constitution.

18 Q. Between 2001 and 2005 did you pay any
19 females for sex?

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

1 that the alleged minor girls' last names
2 weren't provided.

3 THE WITNESS: I intend to respond to all
4 relevant questions regarding this lawsuit.
5 However, to the present time, at the present
6 time my attorneys have counseled me that I
7 cannot provide answers to any questions
8 relevant to this lawsuit, and I must accept
9 this advice or risk losing my Sixth Amendment
10 right to effective representation.

11 Accordingly, I assert my Federal
12 Constitutional rights as guaranteed by the
13 Fifth, Sixth, and Fourteenth Amendment to the
14 United States Constitution.

15 Q. (By Mr. Edwards) How did the minor girls
16 previously named in this deposition arrive to your
17 mansion between 2001 and 2005?

18 MR. BURMAN: Objection, vague and
19 indefinite.

20 MR. GOLDBERGER: And it's, it's vague and
21 indefinite, but to assist in answering the
22 question, can you tell us what mansion you're
23 talking about?

24 MR. EDWARDS: Palm Beach mansion.

25 THE WITNESS: Can you repeat the question?

1 representation.

2 Accordingly, I assert Federal
3 Constitutional rights under the Fifth, Sixth, and
4 Fourteenth Amendment to the United States
5 Constitution.

6 Q. Between 2001 and 2005 did you tell minor
7 female girls at your house that you prefer to engage
8 in sexual activities with minors?

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

16 Accordingly, I assert my Federal
17 Constitutional rights as guaranteed by the Fifth,
18 Sixth, and Fourteenth Amendment to the United States
19 Constitution.

20 Q. Is it true that many of the 49 minor girls
21 previously named told you that they were under the
22 age of 15 at the time you were engaging in sex acts
23 with them?

24 MR. BURMAN: Object to form of the
25 question, vague and indefinite to the extent

1 Q. (By Mr. Edwards) How did they arrive at
2 your house?

3 A. "They" arrive?

4 Q. How did any of the minor girls whose names
5 I named previously in this deposition arrive to your
6 house?

7 MR. BURMAN: Object to the form of the
8 question, vague and indefinite to the extent
9 that the alleged minor girls' last names
10 weren't provided.

11 THE WITNESS: I intend to respond to all
12 relevant questions regarding this lawsuit.
13 However, at the present time my attorneys have
14 counseled me that I cannot provide answers to
15 any questions relevant to this lawsuit, that I
16 must accept this advice or risk losing my Sixth
17 Amendment right to effective representation.

18 Accordingly, I assert my Federal
19 Constitutional rights as guaranteed by the
20 Fifth, Sixth, and Fourteenth Amendment to the
21 constitution.

22 Q. (By Mr. Edwards) Many of the minor girls
23 named previously in this deposition did not drive a
24 car to your house or have a driver's license, isn't
25 that true?

1 MR. BURMAN: Object to form of the
 2 question, vague and indefinite to the extent
 3 that the alleged minor girls' last names
 4 weren't provided.
 5 THE WITNESS: You have to repeat the
 6 question, again. Sorry.
 7 Q. (By Mr. Edwards) Isn't it true that many
 8 of the minor girls previously named in this
 9 deposition did not drive a car or have driver's
 10 licenses?
 11 MR. BURMAN: Same objection.
 12 THE WITNESS: I intend to respond to all
 13 relevant questions regarding this lawsuit.
 14 However, at the present time my attorneys have
 15 counseled me that I cannot provide answers to
 16 any questions relevant to this lawsuit, and I
 17 must accept this advice or risk losing my Sixth
 18 Amendment right to effective representation.
 19 Accordingly, I assert my Federal
 20 Constitutional rights as guaranteed by the
 21 Fifth, Sixth, and Fourteenth Amendment to the
 22 United States Constitution.
 23 Q. (By Mr. Edwards) Is it true that you
 24 discussed with many of these girls the fact that
 25 they were in middle school or high school at the

1 MR. BURMAN: Are you talking about the 49?
 2 MR. EDWARDS: No.
 3 MR. BURMAN: No.
 4 Q. (By Mr. Edwards) Did any minor girls that
 5 engaged in sex or sex acts with you between the
 6 years of 2001 and 2005 at your house tell you that
 7 they were in middle school or high school at the
 8 time?
 9 MR. BURMAN: Object to the form.
 10 THE WITNESS: I intend to respond to all
 11 relevant questions regarding this lawsuit.
 12 However, at the present time my attorneys have
 13 counseled me that I cannot provide answers to
 14 any questions relevant to this lawsuit, and I
 15 must accept this advice or risk losing my Sixth
 16 Amendment right to effective representation.
 17 Accordingly, I assert my Federal
 18 Constitutional rights as guaranteed by the
 19 Fifth, Sixth, and Fourteenth Amendment to the
 20 constitution.
 21 MR. EDWARDS: Okay. What time do you want
 22 to break for lunch?
 23 MR. GOLDBERGER: 1:00.
 24 THE WITNESS: 1:15?
 25 MR. GOLDBERGER: Yeah, 1:15. Is that

1 time they were engaging in sex acts with you at your
 2 house?
 3 MR. BURMAN: Are you referring to the
 4 previous 49?
 5 MR. EDWARDS: Yes.
 6 MR. BURMAN: Okay. Object to form of the
 7 question, vague and indefinite to the extent
 8 that the names, the last names of many of the
 9 alleged minor girls weren't provided.
 10 THE WITNESS: I intend to respond to all
 11 relevant questions regarding this lawsuit.
 12 However, at the present time my attorneys have
 13 counseled me that I cannot provide answers to
 14 any questions relevant to this lawsuit, and I
 15 must accept this advice or risk losing my Sixth
 16 Amendment right to effective representation.
 17 Accordingly, I assert my Federal
 18 Constitutional rights as guaranteed by the
 19 Fifth, Sixth, and Fourteenth Amendment to the
 20 United States Constitution.
 21 Q. (By Mr. Edwards) Did any of the girls
 22 that engaged in sex acts with you at your house
 23 between 2001 and 2005 tell you that they were in
 24 middle school or high school?
 25 A. Sorry, repeat the question.

1 okay?
 2 MR. EDWARDS: Yeah, that's fine with me.
 3 What time do we have now?
 4 THE WITNESS: It will be another hour.
 5 (Thereupon, a discussion was had off
 6 the record.)
 7 Q. (By Mr. Edwards) Did you ever discuss
 8 with any minor girls at your house that you would
 9 pay them to bring you other minor girls for the
 10 purposes of sex?
 11 MR. BURMAN: Object to the form.
 12 THE WITNESS: I intend to respond to all
 13 relevant questions regarding this lawsuit.
 14 However, at the present time my attorneys have
 15 counseled me that I cannot provide answers to
 16 any questions relevant to this lawsuit, and I
 17 must accept this advice or risk losing my Sixth
 18 Amendment right to effective representation.
 19 Accordingly, I assert my Federal
 20 Constitutional right as guaranteed by the
 21 Fifth, Sixth, and Fourteenth Amendment to the
 22 United States Constitution.
 23 Q. (By Mr. Edwards) Did you tell any of the
 24 minor girls that were at your house for sex that you
 25 preferred pure, young girls for sex?

1 MR. BURMAN: Object to the form.

2 THE WITNESS: I intend to respond to all
3 relevant questions regarding this lawsuit.
4 However, at the present time my attorneys have
5 counseled me that I cannot provide answers to
6 any questions relevant to this lawsuit, and I
7 must accept this advice or risk losing my Sixth
8 Amendment right to effective representation.

9 Accordingly, I assert my Federal
10 Constitutional rights as guaranteed by the
11 Fifth, Sixth, and Fourteenth Amendment to the
12 constitution.

13 Q. (By Mr. Edwards) Did you tell any of the
14 minor girls at your house between 2001 and 2005 that
15 you do not like girls that have tattoos?

16 MR. BURMAN: Object to the form.

17 THE WITNESS: I intend to respond to all
18 relevant questions regarding this lawsuit.
19 However, at the present time my attorneys have
20 counseled me that I cannot provide answers to
21 any questions relevant to this lawsuit, and
22 must accept this advice or risk losing my Sixth
23 Amendment right to effective representation.

24 Accordingly, I assert my Federal
25 Constitutional right as guaranteed by the

1 Fifth, Sixth, and Fourteenth Amendment of the
2 constitution.

3 Q. (By Mr. Edwards) Did you tell any of the
4 minor girls that were at your house not to bring you
5 any girls that were pregnant or had babies?

6 MR. BURMAN: Object to the form.

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

14 Accordingly, I assert my Federal
15 Constitutional right as guaranteed by the
16 Fifth, Sixth, and Fourteenth Amendment to the
17 constitution?

18 Q. (By Mr. Edwards) Did you specifically
19 instruct any of the minor girls not to bring you any
20 black girls?

21 MR. BURMAN: Object to the form.

22 THE WITNESS: I intend to respond to all
23 relevant questions regarding this lawsuit.
24 However, at the present time my attorneys have
25 counseled me that I cannot provide answers to

1 any questions relevant to this lawsuit, and I
2 must accept this advice or risk losing my Sixth
3 Amendment right to effective representation.

4 Accordingly, I assert my Federal
5 Constitutional rights as guaranteed by the
6 Fifth, Sixth and Fourteenth Amendment of the
7 constitution.

8 Q. (By Mr. Edwards) Isn't it true that you
9 did not like to have sex or engage in sex acts with
10 black girls?

11 MR. BURMAN: Object to the form.

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

19 Accordingly, I assert my Federal
20 Constitutional rights as guaranteed by the
21 Fifth, Sixth, and Fourteenth Amendment.

22 Q. (By Mr. Edwards) Isn't it true that black
23 girls were brought to your house and you turned them
24 away at the door because you do not like black
25 girls?

1 MR. BURMAN: Object to the form.

2 THE WITNESS: I intend to respond to all
3 relevant questions regarding this lawsuit.
4 However, at the present time my attorneys have
5 counseled me that I cannot provide answers to
6 any questions relevant to this lawsuit, and I
7 must accept this advice or risk losing my Sixth
8 Amendment right to effective representation.

9 Accordingly, I assert my Federal
10 Constitutional rights as guaranteed by the
11 Fifth, Sixth and Fourteenth Amendment to the
12 constitution.

13 Q. (By Mr. Edwards) Isn't it true that you
14 also turned away girls because they were 18 years or
15 older and too old for you?

16 MR. BURMAN: Object to the form.

17 THE WITNESS: I intend to respond to all
18 relevant questions regarding this lawsuit.
19 However, at the present time my attorneys have
20 counseled me that I cannot provide answers to
21 any questions relevant to this lawsuit, and I
22 must accept the advice or risk losing my Sixth
23 Amendment right to effective representation.

24 Accordingly, I assert Federal
25 Constitutional rights as guaranteed by the

1 Fifth, Sixth and Fourteenth Amendment to the
 2 United States Constitution.
 3 Q. (By Mr. Edwards) Isn't it true that you
 4 also turned away minor girls with tattoos because
 5 you did not feel that they were pure?
 6 MR. BURMAN: Object to the form.
 7 THE WITNESS: I intend to respond to all
 8 relevant questions regarding this lawsuit.
 9 However, at the present time my attorneys have
 10 counseled me that I cannot provide answers to
 11 any questions relevant to this lawsuit, and I
 12 must accept this advice or risk losing my Sixth
 13 Amendment right to effective representation.
 14 Accordingly, I assert my Federal
 15 Constitutional right as guaranteed by the
 16 Fifth, Sixth, and Fourteenth Amendment to the
 17 United States Constitution.
 18 Q. (By Mr. Edwards) Is it true that your
 19 specific instructions were, to these minor girls, to
 20 bring you white girls between the ages of 12 and 17
 21 that were not pregnant, did not have babies, and did
 22 not have tattoos?
 23 MR. BURMAN: Object to the form.
 24 THE WITNESS: I intend to respond to all
 25 relevant questions regarding this lawsuit.

1 any questions relevant to this lawsuit, and I
 2 must accept this advice or risk losing my Sixth
 3 Amendment right to effective representation.
 4 Accordingly, I assert my Federal
 5 Constitutional rights as guaranteed by the
 6 Fifth, Sixth, and Fourteenth Amendment to the
 7 United States Constitution.
 8 Q. (By Mr. Edwards) Why did you laugh about
 9 that last question?
 10 MR. BURMAN: Object to the form.
 11 THE WITNESS: I have a stomachache at the
 12 moment. I wasn't laughing.
 13 Q. (By Mr. Edwards) Isn't it true that you
 14 targeted young, economically deprived kids with
 15 little or no parental guidance?
 16 MR. BURMAN: Object to the form.
 17 THE WITNESS: You have to repeat the
 18 question.
 19 Q. (By Mr. Edwards) Isn't it true that you
 20 were targeting young, economically deprived minor
 21 girls with little or no parental guidance?
 22 MR. BURMAN: Object to the form.
 23 Q. (By Mr. Edwards) For sex.
 24 A. I intend to respond to all relevant
 25 questions regarding this lawsuit. However, at the

1 However, at the present time my attorneys have
 2 counseled me that I cannot provide answers to
 3 any questions relevant to this lawsuit, and I
 4 must accept this advice or risk losing my Sixth
 5 Amendment right to effective representation.
 6 Accordingly, I assert my Federal
 7 Constitutional right as guaranteed by the
 8 Fifth, Sixth, and Fourteenth Amendment to the
 9 constitution.
 10 Q. (By Mr. Edwards) Is it true that you
 11 offered each minor girl approximately \$200 in cash
 12 for sex?
 13 MR. BURMAN: Object to the form. Are you
 14 back on the 49, or is this generic?
 15 MR. EDWARDS: No, generic.
 16 THE WITNESS: Would you repeat the
 17 question?
 18 Q. (By Mr. Edwards) Between 2001 and 2005
 19 isn't it true that you offered each minor girl that
 20 came to your house for sex \$200 for that sex?
 21 MR. BURMAN: Object to the form.
 22 THE WITNESS: I intend to respond to all
 23 relevant questions regarding this lawsuit.
 24 However, at the present time my attorneys have
 25 counseled me that I cannot provide answers to

1 present time my attorneys have counseled me that I
 2 cannot provide answers to any questions relevant to
 3 this lawsuit, and I must accept their advice or risk
 4 losing my Sixth Amendment right to effective
 5 representation.
 6 Accordingly, I assert my Federal
 7 Constitutional rights as guaranteed by the Fifth,
 8 Sixth, and Fourteenth Amendment to the United States
 9 Constitution.
 10 Q. Have you ever told anybody that the girls
 11 were over at your house because you just like
 12 massages?
 13 MR. BURMAN: Object to the form.
 14 THE WITNESS: I intend to respond to all
 15 relevant questions regarding this lawsuit.
 16 However, at the present time my attorneys have
 17 counseled me that I cannot provide answers to
 18 any questions relevant to this lawsuit, and I
 19 must accept this advice or risk losing my Sixth
 20 Amendment right to effective representation.
 21 Accordingly, I assert my Federal
 22 Constitutional right as guaranteed by the
 23 Fifth, Sixth, and Fourteenth Amendment to the
 24 United States Constitution.
 25 Q. (By Mr. Edwards) Isn't it true that none

1 of these minor girls that you engaged in sex acts
2 with at your house had any massage experience?

3 MR. BURMAN: Object to the form.

4 THE WITNESS: I intend to respond to all
5 relevant questions regarding this lawsuit.

6 However, at the present time my attorneys have
7 counseled me that I cannot provide answers to
8 any questions relevant to this lawsuit, and I
9 must accept this advice or risk losing my Sixth
10 Amendment right to effective representation.

11 Accordingly, I assert my Federal
12 Constitutional rights as guaranteed by the
13 Fifth, Sixth, and Fourteenth Amendment to the
14 United States Constitution.

15 Q. (By Mr. Edwards) Between 2001 and 2005
16 did you ever have a professional masseuse give you a
17 massage at your house in Palm Beach?

18 A. I intend to respond to all relevant
19 questions regarding this lawsuit. However, at the
20 present time my attorneys have counseled me that I
21 cannot provide answers to any questions relevant to
22 this lawsuit, and I must accept this advice or risk
23 losing my Sixth Amendment right to effective
24 representation.

25 Accordingly, I assert my Federal

1 Q. (By Mr. Edwards) Did you tell these minor
2 girls between 2001 and 2005 at your Palm Beach
3 mansion to get naked and touch you so that you could
4 get off?

5 A. Get off?

6 MR. GOLDBERGER: Are you asking him if
7 that's a statement that was made?

8 MR. EDWARDS: Yes, to these girls.

9 MR. BURMAN: Object to the form.

10 THE WITNESS: I intend to respond to all
11 relevant questions regarding this lawsuit.

12 However, at the present time my attorneys have
13 counseled me that I cannot provide answers to
14 any questions relevant to this lawsuit, and I
15 must accept this advice or risk losing my Sixth
16 Amendment right to effective representation.

17 Accordingly, I assert my Federal
18 Constitutional right as guaranteed by the
19 Fifth, Sixth, and Fourteenth Amendment to the
20 United States Constitution.

21 Q. (By Mr. Edwards) Will you agree that you
22 exchanged money for sexual gratification with at
23 least 50 girls at your Palm Beach mansion between
24 2001 and 2005?

25 MR. BURMAN: Object to the form.

1 Constitutional rights as guaranteed by the Fifth,
2 Sixth, and Fourteenth Amendment of the United States
3 Constitution.

4 Q. In fact, when these minor girls would tell
5 you they had no massage experience, didn't you
6 respond by telling them that that is actually better
7 for you?

8 MR. BURMAN: Object to the form.

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

16 Accordingly, I assert my Federal
17 Constitutional right as guaranteed by the
18 Fifth, Sixth and Fourteenth Amendment to the
19 constitution.

20 Q. (By Mr. Edwards) Did you tell these minor
21 girls to get naked and touch you so that you could
22 get off?

23 MR. BURMAN: Object to the form.

24 THE WITNESS: What? What's -- repeat the
25 question.

1 THE WITNESS: I intend to respond to all
2 relevant questions regarding this lawsuit.
3 However, at the present time my attorneys have
4 counseled me not to provide answers to any
5 questions relevant to this lawsuit, and I must
6 accept this advice or risk losing my Sixth
7 Amendment right to effective representation.

8 Accordingly, I assert my Federal
9 Constitutional rights as guaranteed by the
10 Fifth, Sixth, and Fourteenth Amendment to the
11 United States Constitution.

12 Q. (By Mr. Edwards) Between 2001 and 2005
13 you never ordered a professional escort to come to
14 your house for sex, did you?

15 A. Rephrase the question, please.

16 Q. Between 2001 and 2005 you never ordered
17 from an escort service in Palm Beach County for a
18 professional escort to come to your house for sex,
19 did you?

20 A. You never ordered?

21 THE WITNESS: Do I answer the question?

22 MR. GOLDBERGER: You don't understand.
23 Rephrase it.

24 Q. (By Mr. Edwards) Did you ever call an
25 escort service to have an escort sent to your house

1 in Palm Beach for sex?

2 A. I intend to respond to all relevant
3 questions regarding this lawsuit. However, at the
4 present time my attorneys have counseled me that I
5 cannot provide answers to any questions relevant to
6 this lawsuit, and I must accept this advice or risk
7 losing my Sixth Amendment right to effective
8 representation.

9 Accordingly, I assert my Federal
10 Constitutional right as guaranteed by the Fifth,
11 Sixth and Fourteenth Amendment to the United States
12 Constitution.

13 Q. You did not call a professional escort
14 because that would likely result in a girl over the
15 age of 18 coming to your house for sex, right?

16 MR. BURMAN: Object to the form.

17 THE WITNESS: I intend to respond to all
18 relevant questions regarding this lawsuit.
19 However, at the present time my attorneys have
20 counseled me that I cannot provide answers to
21 any questions relevant to this lawsuit, and I
22 must accept this advice or risk losing my Sixth
23 Amendment right to effective representation.

24 Accordingly, I assert my Federal
25 Constitutional rights as guaranteed by the

1 Accordingly, I assert my Federal
2 Constitutional rights as guaranteed by the Fifth,
3 Sixth, and Fourteenth Amendment to the constitution.

4 Q. Did you instruct her to assist you in
5 gaining access to minor girls for sex?

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

13 Accordingly, I assert my constitutional
14 rights as guaranteed by the Fifth, Sixth, and
15 Fourteenth Amendment to the United States
16 Constitution.

17 Q. Did you instruct any other employees of
18 yours to assist you in gaining access to minors for
19 sex?

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

1 Fifth, Sixth, and Fourteenth Amendment of the
2 constitution.

3 Q. (By Mr. Edwards) Do you enjoy coercing
4 minors into sex acts with you?

5 MR. BURMAN: Object to the form.

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

13 Accordingly, I assert my Federal
14 Constitutional right as guaranteed by the
15 Fifth, Sixth, and Fourteenth Amendment to the
16 United States Constitution.

17 Q. (By Mr. Edwards) Do you know [REDACTED]

18 [REDACTED]
19 A. I intend to respond to all relevant
20 questions regarding this lawsuit. However, at the
21 present time my attorneys have counseled me that I
22 cannot provide answers to any questions relevant to
23 this lawsuit, and I must accept this advice or risk
24 losing my Sixth Amendment right to effective
25 representation.

1 representation.

2 Accordingly, I assert my Federal
3 Constitutional rights as guaranteed by the Fifth,
4 Sixth, and Fourteenth Amendment to the United States
5 Constitution.

6 Q. What people were living with you in your
7 Palm Beach mansion between 2001 and 2005?

8 MR. GOLDBERGER: Object to the form.

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

16 Accordingly, I assert my Federal
17 Constitutional rights as guaranteed by the
18 Fifth, Sixth, and Fourteenth Amendment to the
19 United States Constitution.

20 Q. (By Mr. Edwards) Did you meet with people
21 employed by you to discuss a plan to gain access to
22 minor girls for the purposes of sex?

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

1 cannot provide answers to any questions relevant to
2 this lawsuit, and I must accept this advice or risk
3 losing my Sixth Amendment right to effective
4 representation.

5 Accordingly, I assert my Federal
6 Constitutional rights as guaranteed by the Fifth,
7 Sixth, and Fourteenth Amendment to the United States
8 Constitution.

9 Q. Which employees did you discuss your plan
10 to gain access to minor girls for the purposes of
11 sex?

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

19 Accordingly, I assert my Federal
20 Constitutional rights as guaranteed by the Fifth,
21 Sixth, and Fourteenth Amendment to the United States
22 Constitution.

23 Q. Is it true that you have many people
24 working in your house in Palm Beach County, or did,
25 between the years 2001 and 2005?

1 representation.

2 Accordingly, I assert my Federal
3 Constitutional rights as guaranteed by the Fifth,
4 Sixth, and Fourteenth Amendment of the United States
5 Constitution.

6 Q. Did you ever personally procure a, or
7 sorry, strike that.

8 Did you ever personally go out and recruit
9 a minor girl to bring back to your house for sex?

10 THE WITNESS: Object to form, no?

11 MR. BURMAN: Object to form.

12 THE WITNESS: I intend to respond to all
13 relevant questions regarding --

14 MR. EDWARDS: I'm sorry, is there
15 something you don't understand about the
16 question? If you don't, I'll rephrase it.

17 MR. GOLDBERGER: We objected to the form,
18 now you can answer.

19 MR. EDWARDS: I thought he objected to the
20 form, that's why I was --

21 MR. GOLDBERGER: He asked -- I'm not --
22 Brad, he asked his lawyer a question, that's
23 all. We objected to the form, that's fine.

24 MR. EDWARDS: Okay.

25 MR. GOLDBERGER: Go ahead and answer.

1 A. I intend to respond to all relevant
2 questions regarding this lawsuit. However, at the
3 present time my attorneys have counseled me that I
4 cannot provide answers to any questions relevant to
5 this lawsuit, and I must accept this advice or risk
6 losing my Sixth Amendment right to effective
7 representation.

8 Accordingly, I assert my Federal
9 Constitutional right as guaranteed by the Fifth,
10 Sixth, and Fourteenth Amendment to the United States
11 Constitution.

12 Q. How many employees work in the various
13 houses that you own right now?

14 A. That's -- that question is owned right
15 now? I don't understand the question.

16 Q. Well, it's my understanding that you own
17 numerous properties. I just want to know how many
18 people are actually paid by you or employed by you
19 that work and/or live in those homes?

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

1 THE WITNESS: I intend to respond to all
2 relevant questions regarding this lawsuit.
3 However, at the present time my attorneys have
4 counseled me that I cannot provide answers to
5 any questions relevant to this lawsuit, and I
6 must accept the advice or risk losing my Sixth
7 Amendment right to effective representation.

8 Accordingly, I assert my Federal
9 Constitutional right as guaranteed by the
10 Fifth, Sixth, and Fourteenth Amendments to the
11 United States Constitution.

12 Q. (By Mr. Edwards) Who is the first minor
13 girl that you brought to your house for sex?

14 MR. BURMAN: Object to the form.

15 THE WITNESS: I intend to respond to all
16 relevant questions regarding this lawsuit.
17 However, at the present time my attorneys have
18 counseled me that I cannot provide answers to
19 any questions relevant to this lawsuit, and I
20 must accept the advice or risk losing my Sixth
21 Amendment to effective representation.

22 Accordingly, I assert my Federal
23 Constitutional rights as guaranteed by the
24 Fifth, Sixth, and Fourteenth Amendment to the
25 United States Constitution.

1 Q. (By Mr. Edwards) Have you had sex with
 2 over 100 minor girls in the last ten years?
 3 MR. BURMAN: Object to the form.
 4 THE WITNESS: I intend to respond to all
 5 relevant questions regarding this lawsuit.
 6 However, at the present time my attorneys have
 7 counseled me that I cannot provide answers to
 8 any questions relevant to this lawsuit, and I
 9 must accept this advice or risk losing my Sixth
 10 Amendment right to effective representation.
 11 Accordingly, I assert my Federal
 12 Constitutional rights as guaranteed by the
 13 Fifth, Sixth, and Fourteenth Amendment to the
 14 United States Constitution.
 15 Q. (By Mr. Edwards) When did you devise your
 16 plan to gain access to minor girls for sex?
 17 MR. BURMAN: Object to the form.
 18 THE WITNESS: I intend to respond to all
 19 relevant questions regarding this lawsuit.
 20 However, at the present time my attorneys have
 21 counseled me that I cannot provide answers to
 22 any questions relevant to this lawsuit, and I
 23 must accept this advice or risk losing my Sixth
 24 Amendment right to effective representation.
 25 Accordingly, I assert my Federal

1 relevant questions regarding this lawsuit.
 2 However, at the present time my attorneys have
 3 counseled me that I cannot provide answers to
 4 any questions relevant to this lawsuit, and I
 5 must accept this advice or risk losing my Sixth
 6 Amendment right to effective representation.
 7 Accordingly, I assert my Federal
 8 Constitutional rights as guaranteed by the
 9 Fifth, Sixth, and Fourteenth Amendment to the
 10 United States Constitution.
 11 Q. (By Mr. Edwards) Was the target age range
 12 for your criminal enterprise always minors between
 13 the ages of 12 and 16?
 14 MR. BURMAN: Object to the form.
 15 THE WITNESS: I intend to respond to all
 16 relevant questions regarding this lawsuit.
 17 However, at the present time my attorneys have
 18 counseled me that I cannot provide answers to
 19 any questions relevant to this lawsuit, and I
 20 must accept this advice or risk losing my Sixth
 21 Amendment right to effective representation.
 22 Accordingly, I assert my Federal
 23 Constitutional rights as guaranteed by the
 24 Fifth, Sixth, and Fourteenth Amendments to the
 25 United States Constitution.

1 Constitutional rights as guaranteed by the
 2 Fifth, Sixth, and Fourteenth Amendment to the
 3 United States Constitution.
 4 Q. (By Mr. Edwards) With whom did you meet
 5 to discuss your plan to gain access to minor girls
 6 for sex?
 7 MR. BURMAN: Object to the form.
 8 THE WITNESS: I intend to respond to all
 9 relevant questions regarding this lawsuit.
 10 However, at the present time my attorneys have
 11 counseled me that I cannot provide answers to
 12 any questions relevant to this lawsuit, and I
 13 must accept this advice or risk losing my Sixth
 14 Amendment right to effective representation.
 15 Accordingly, I assert my Federal
 16 Constitutional right as guaranteed by the
 17 Fifth, Sixth, and Fourteenth Amendment to the
 18 United States Constitution.
 19 Q. (By Mr. Edwards) Do you agree that you
 20 have a criminal enterprise that is comprised of, at
 21 the very least, yourself, [REDACTED] and [REDACTED]
 22 [REDACTED] who have the common goal of bringing
 23 minors to you for the purposes of sex?
 24 MR. BURMAN: Object to the form.
 25 THE WITNESS: I intend to respond to all

1 Q. (By Mr. Edwards) What are the names of
 2 all of the members of your criminal enterprise that
 3 has the common goal of procuring minors for the
 4 purposes of sex?
 5 MR. BURMAN: Object to the form.
 6 THE WITNESS: I intend to respond to all
 7 relevant questions regarding this lawsuit.
 8 However, at the present time my attorneys have
 9 counseled me that I cannot provide answers to
 10 any questions relevant to this lawsuit, and I
 11 must accept this advice or risk losing my Sixth
 12 Amendment to effective representation.
 13 Accordingly, I assert my Federal
 14 Constitutional rights as guaranteed by the
 15 Fifth, Sixth, and Fourteenth Amendment to the
 16 United States Constitution.
 17 Q. (By Mr. Edwards) In addition to paying
 18 each of these minor girls approximately \$200 for
 19 sex, did you also provide transportation for them to
 20 and from your house?
 21 MR. BURMAN: Are we generic, or are we
 22 going with the 49?
 23 MR. EDWARDS: Generic.
 24 MR. BURMAN: Generic? Okay. Object to
 25 the form.

1 THE WITNESS: You have to repeat the
 2 question, I'm sorry.
 3 Q. (By Mr. Edwards) In addition to paying
 4 minor girls approximately \$200 to engage in sex or
 5 sex acts with them, did you also provide
 6 transportation for these minor girls to and from
 7 your house?
 8 MR. BURMAN: Same objection.
 9 THE WITNESS: I intend to respond to all
 10 relevant questions regarding this lawsuit.
 11 However, at the present time my attorneys have
 12 counseled me that I cannot provide any answers
 13 relevant to this lawsuit, and I must accept the
 14 advice or risk losing my Sixth Amendment right
 15 to effective representation.
 16 Accordingly, I assert my Federal
 17 Constitutional rights as guaranteed by the
 18 Fifth, Sixth, and Fourteenth Amendment to the
 19 United States Constitution.
 20 Q. (By Mr. Edwards) Did you, one of your
 21 employees, or someone within your enterprise have an
 22 account with Yellow Cab for the purposes of
 23 transporting minors to and from your house?
 24 MR. BURMAN: Object to form.
 25 MR. GOLDBERGER: Do you understand the

1 Accordingly, I assert my Federal
 2 Constitutional right as guaranteed by the
 3 Fifth, Sixth and Fourteenth Amendment to the
 4 United States Constitution.
 5 Sorry, can we take a break again?
 6 Bathroom break.
 7 MR. EDWARDS: Let's just break for lunch
 8 then.
 9 MR. GOLDBERGER: I can't, because I've
 10 got -- there's a reason why, I've got a
 11 commitment at 1:15, so --
 12 THE VIDEOGRAPHER: Off the record at
 13 12:40.
 14 (Thereupon, a discussion was had off
 15 the record.)
 16 (Thereupon, a brief break was taken.)
 17 THE VIDEOGRAPHER: Back on the record at
 18 12:54.
 19 Q. (By Mr. Edwards) Between 2001 and 2005
 20 did you or any of your employees or assistants have
 21 an account with Yellow Cab?
 22 A. I intend to respond to all relevant
 23 questions regarding this lawsuit. However, at the
 24 present time my attorneys have counseled me that I
 25 cannot provide answers to any questions relevant to

1 question when he says "enterprise"? Do you
 2 have any idea what he means?
 3 THE WITNESS: No.
 4 MR. GOLDBERGER: Can you define
 5 enterprise, so we can determine whether we need
 6 to answer the question.
 7 MR. EDWARDS: I'm talking about persons
 8 involved with a common goal. We have defined
 9 this earlier.
 10 MR. GOLDBERGER: I'm sorry, I was out of
 11 the room did you define it?
 12 MR. EDWARDS: You were out of the room.
 13 MR. GOLDBERGER: Okay.
 14 MR. EDWARDS: And persons, we defined it
 15 as, at the very least, Mr. Epstein, [REDACTED]
 16 [REDACTED] having the common
 17 goal of bringing minors to and from the Palm
 18 Beach house for the purposes of sex.
 19 THE WITNESS: I intend to respond to all
 20 relevant questions regarding this lawsuit.
 21 However, at the present time my attorneys have
 22 counseled me that I cannot provide answers to
 23 any questions relevant to this lawsuit, and I
 24 must accept this advice or risk losing my Sixth
 25 Amendment right to effective representation.

1 this lawsuit, and I must accept their advice or risk
 2 losing my Sixth Amendment right to effective
 3 representation.
 4 Accordingly, I assert my Federal
 5 Constitutional right as guaranteed by the Fifth,
 6 Sixth, and Fourteenth Amendment to the United States
 7 Constitution.
 8 Q. Are you currently actually a billionaire?
 9 MR. BURMAN: Objection. That goes to
 10 punitive damages, and I object.
 11 THE WITNESS: I intend to respond to all
 12 relevant questions regarding this lawsuit.
 13 However, at the present time my attorneys have
 14 counseled me that I cannot provide answers to
 15 any questions relevant to this lawsuit, and I
 16 must accept this advice or risk losing my Sixth
 17 Amendment right to effective representation.
 18 Accordingly, I assert my Federal
 19 Constitutional right as guaranteed by the
 20 Fifth, Sixth, and Fourteenth Amendment to the
 21 United States Constitution.
 22 MR. BURMAN: And I should add for the
 23 record that I would instruct him not to answer
 24 that question, even if he wasn't invoking the
 25 Fifth.

1 Q. (By Mr. Edwards) Between 2001 and 2005
2 were you a billionaire?

3 MR. BURMAN: Objection, instruct you not
4 to answer that question based on the fact that
5 that's directed toward punitive damages, and
6 that has not been allowed to file, be filed, or
7 proceeded with in the state court action.

8 You should read that, as well.

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

17 Accordingly, I assert my Federal
18 Constitutional rights as guaranteed by the
19 Fifth, Sixth and Fourteenth Amendment to the
20 United States Constitution.

21 Q. (By Mr. Edwards) Between 2001 and 2005
22 what types of cars did you have that you owned,
23 parked in your driveway at your Palm Beach mansion?

24 MR. BURMAN: Object, once again on the
25 grounds that punitive damages have not been

1 Q. (By Mr. Edwards) What is the square
2 footage of your house in Palm Beach?

3 MR. BURMAN: Object, on the grounds that
4 that question, in part, delves into his
5 financial situation, which has not been
6 approved to be explored in this case yet,
7 because punitive damages have not been approved
8 or allowed to be proceeded with here, and I
9 instruct him not to answer the question.

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

17 Accordingly, I assert my Federal
18 Constitutional rights as guaranteed by the
19 Fifth, Sixth and Fourteenth Amendment to the
20 United States Constitution.

21 Q. (By Mr. Edwards) Did you tell the minor
22 girls that were at your house that you were
23 extremely wealthy between 2001 and 2005?

24 MR. GOLDBERGER: Object to the form.

25 THE WITNESS: I intend to respond to all

1 approved yet in this case. I instruct him not
2 to answer that question.

3 THE WITNESS: I intend to respond to all
4 relevant questions regarding this lawsuit.
5 However, at the present time my attorneys have
6 counseled me that I cannot provide answers to
7 any questions relevant to this lawsuit, and I
8 must accept this advice or risk losing my Sixth
9 Amendment right to effective representation.

10 Accordingly, I assert my Federal
11 Constitutional rights as guaranteed by the
12 Fifth, Sixth, and Fourteenth Amendment to the
13 United States Constitution.

14 Q. (By Mr. Edwards) Is your house in Palm
15 Beach located on the water?

16 THE WITNESS: I intend to respond to all
17 relevant questions regarding this lawsuit.
18 However, at the present time my attorneys have
19 counseled me that I cannot provide answers to
20 any questions relevant to this lawsuit, and I
21 must accept this advice or risk losing my Sixth
22 Amendment right to effective representation.

23 Accordingly, I assert my Federal
24 Constitutional rights under the Fifth, Sixth,
25 and Fourteenth Amendment to the constitution.

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

7 Accordingly, I assert my Federal
8 Constitutional rights as guaranteed by the
9 Fifth, Sixth and Fourteenth Amendment to the
10 United States Constitution.

11 Q. (By Mr. Edwards) Did you talk to the
12 minor girls that were at your house between 2001 and
13 2005 about all of the houses and cars that you
14 owned?

15 MR. BURMAN: Object to the form.

16 THE WITNESS: I intend to respond to all
17 relevant questions regarding this lawsuit.
18 However, at the present time my attorneys have
19 counseled me that I cannot provide answers to
20 any questions relevant to this lawsuit, and I
21 must accept this advice or risk losing my Sixth
22 Amendment right to effective representation.

23 Accordingly, I assert my Federal
24 Constitutional rights as guaranteed by the
25 Fifth, Sixth, and Fourteenth Amendment to the

1 United States Constitution.
2 Q. (By Mr. Edwards) Did you use your wealth
3 and the minors lack thereof to influence that minor
4 to have sex with you?

5 MR. BURMAN: Object to the form.

6 THE WITNESS: I intend to respond to all
7 relevant questions regarding this lawsuit.

8 However, at the present time my attorneys have
9 counseled me that I cannot provide answers to
10 any questions relevant to this lawsuit, and
11 must accept advice or risk losing my Sixth
12 Amendment right to effective representation.

13 Accordingly, I assert my Federal
14 Constitutional rights as guaranteed by the
15 Fifth, Sixth, and Fourteenth Amendment to the
16 United States Constitution.

17 Q. (By Mr. Edwards) After you ejaculated in
18 front of minor girls, did you tell each one of them
19 that every time she came to your house for sex, you
20 would pay her \$200 cash?

21 MR. BURMAN: Object to the form.

22 THE WITNESS: I intend to respond to all
23 relevant questions regarding this lawsuit.

24 However, at the present time my attorneys have
25 counseled me that I cannot provide answers to

1 THE WITNESS: I intend to respond to all
2 relevant questions regarding this lawsuit.
3 However, at the present time my attorneys have
4 counseled me that I cannot provide answers to
5 any questions relevant to this lawsuit, and I
6 must accept the advice or risk losing my Sixth
7 Amendment right to effective representation.

8 Accordingly, I assert my Federal
9 Constitutional rights as guaranteed by the
10 Fifth, Sixth, and Fourteenth Amendments to the
11 United States Constitution.

12 Q. (By Mr. Edwards) Was it part of your plan
13 to display your wealth and power in an effort to
14 gain sexual access to minor girls?

15 MR. BURMAN: Object to the form.

16 THE WITNESS: I intend to respond to all
17 relevant questions regarding this lawsuit.

18 However, at the present time my attorneys have
19 counseled me that I cannot provide answers to
20 any questions relevant to this lawsuit, and I
21 must accept the advice or risk losing my Sixth
22 Amendment right to effective representation.

23 Accordingly, I assert my Federal
24 Constitutional rights as guaranteed by the
25 Fifth, Sixth, and Fourteenth Amendment to the

1 any questions relevant to this lawsuit, and I
2 must accept the advice or risk losing my Sixth
3 Amendment right to effective representation.

4 Accordingly, I assert my Federal
5 Constitutional rights as guaranteed by the
6 Fifth, Sixth, and Fourteenth Amendment to the
7 United States Constitution.

8 Q. (By Mr. Edwards) Was it your plan to
9 groom each minor girl to be your personal sex slave?

10 MR. BURMAN: Object to the form.

11 THE WITNESS: I intend to respond to all
12 relevant questions regarding this lawsuit.

13 However, at the present time my attorneys have
14 counseled me that I cannot provide answers to
15 any questions relevant to this lawsuit, and I
16 must accept this right or risk losing my Sixth
17 Amendment right to effective representation?

18 Accordingly, I assert my Federal
19 Constitutional rights as guaranteed by the
20 Fifth, Sixth, and Fourteenth Amendment to the
21 United States Constitution.

22 Q. (By Mr. Edwards) Did you impress upon
23 each minor girl that what she was doing with you
24 sexually was morally right?

25 MR. BURMAN: Object to the form.

1 United States Constitution.

2 Q. (By Mr. Edwards) Did you intentionally
3 target very poor minor girls because you knew that
4 demographic would be the most impressed by your
5 wealth and likely listen to you?

6 MR. BURMAN: Object to the form.

7 THE WITNESS: I intend to respond to all
8 relevant questions regarding this lawsuit.

9 However, at the present time my attorneys have
10 counseled me that I cannot provide answers to
11 any questions relevant to this lawsuit, and
12 must accept this advice or risk losing my Sixth
13 Amendment right to effective representation.

14 Accordingly, I assert my Federal
15 Constitutional right as guaranteed by the
16 Fifth, Sixth, and Fourteenth Amendment to the
17 United States Constitution.

18 Q. (By Mr. Edwards) None of the minor girls
19 that you engaged in sex or sex acts with had ever
20 engaged in prostitution prior to meeting you, isn't
21 that correct?

22 MR. BURMAN: Object to the form.

23 THE WITNESS: I intend to respond to all
24 relevant questions regarding this lawsuit.
25 However, at the present time my attorneys have

1 counseled me that I cannot provide answers to
2 any questions relevant to this lawsuit, and I
3 must accept the advice or risk losing my Sixth
4 Amendment right to effective representation.

5 Accordingly, I assert my Federal
6 Constitutional rights as guaranteed by the
7 Fifth, Sixth and Fourteenth Amendment to the
8 United States Constitution.

9 Q. (By Mr. Edwards) Isn't it true that you
10 corrupted and injured minor girls for your own
11 sexual gratification?

12 MR. BURMAN: Object to the form.

13 THE WITNESS: I intend to respond to all
14 relevant questions regarding this lawsuit.
15 However, at the present time my attorneys have
16 counseled me that I cannot provide answers to
17 any questions relevant to this lawsuit, and I
18 must accept this advice or risk losing my Sixth
19 Amendment right to effective representation.

20 Accordingly, I assert my Federal
21 Constitutional rights as guaranteed by the
22 Fifth, Sixth, and Fourteenth Amendment to the
23 United States Constitution.

24 Q. (By Mr. Edwards) Isn't it true that you
25 typically engaged in sex or sex acts with minor

1 Constitutional rights as guaranteed by the
2 Fifth, Sixth, and Fourteenth Amendment in the
3 United States Constitution.

4 Q. (By Mr. Edwards) Isn't it true that you
5 and your employees, including [REDACTED] called
6 these minor girls to encourage them to bring more
7 minor girls to you for sex. By called I mean on the
8 telephone?

9 MR. BURMAN: Object to the form.

10 THE WITNESS: Can you repeat the question?

11 Q. (By Mr. Edwards) Isn't it true that you
12 and your assistants or employees, including [REDACTED]
13 [REDACTED] called minor girls on the telephone to
14 encourage them or command that they bring you other
15 minor girls for sex?

16 MR. BURMAN: Object to the form.

17 THE WITNESS: I intend to respond to all
18 relevant questions regarding this lawsuit.
19 However, at the present time my attorneys have
20 counseled me that I cannot provide answers to
21 any questions relevant to this lawsuit, and I
22 must accept this advice or risk losing my Sixth
23 Amendment right to effective representation.

24 Accordingly, I assert my Federal
25 Constitutional rights as guaranteed by the

1 girls three or four times each day at your Palm
2 Beach mansion?

3 MR. BURMAN: Object to the form.

4 THE WITNESS: I intend to respond to all
5 relevant questions regarding this lawsuit.
6 However, at the present time my attorneys have
7 counseled me that I cannot provide answers to
8 any questions relevant to this lawsuit, and I
9 must accept this advice or risk losing my Sixth
10 Amendment right to effective representation.

11 Accordingly, I assert my Federal
12 Constitutional rights as guaranteed by the
13 Fifth, Sixth, and Fourteenth Amendment to the
14 United States Constitution.

15 Q. (By Mr. Edwards) Isn't it true that you
16 in, that you coerced minor girls into prostitution?

17 MR. BURMAN: Object to the form.

18 THE WITNESS: I intend to respond to all
19 relevant questions regarding this lawsuit.
20 However, at the present time my attorneys have
21 counseled me that I cannot provide answers to
22 any questions relevant to this lawsuit, and I
23 must accept this advice or risk losing my Sixth
24 Amendment right to effective representation.

25 Accordingly, I assert my Federal

1 Fifth, Sixth, and Fourteenth Amendment to the
2 United States Constitution.

3 Q. (By Mr. Edwards) What are all the
4 telephone numbers assigned to you or your Palm Beach
5 mansion between 2001 and 2005?

6 A. Again?

7 Q. What were all of the telephone numbers
8 assigned to you or your Palm Beach mansion between
9 2001 and 2005?

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

17 Accordingly, I assert Federal
18 Constitutional rights as guaranteed by the Fifth,
19 Sixth, and Fourteenth Amendment to the United States
20 Constitution.

21 Q. Who scheduled your massage appointments
22 between 2001 and 2005?

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

1 cannot provide answers to any questions relevant to
2 this lawsuit, and I must accept this advice or risk
3 losing my Sixth Amendment right to effective
4 representation.

5 THE WITNESS: Excuse me?

6 Accordingly I assert my Federal
7 Constitutional rights as guaranteed by the
8 Fifth, Sixth, and Fourteenth Amendment to the
9 United States Constitution.

10 Q. (By Mr. Edwards) Is it true that you were
11 ejaculating in front of three or four minor girls
12 per day between 2002 and 2005 at your Palm Beach
13 mansion?

14 MR. BURMAN: Object to the form.

15 THE WITNESS: I intend to respond to all
16 relevant questions regarding this lawsuit.
17 However, at the present time my attorneys have
18 counseled me that I cannot provide answers to
19 any questions relevant to this lawsuit, and I
20 must accept the advice or risk losing my Sixth
21 Amendment right to effective representation.

22 Accordingly, I assert my Federal
23 Constitutional rights as guaranteed by the
24 Fifth, Sixth, and Fourteenth Amendment to the
25 United States Constitution.

1 Accordingly, I assert my Federal
2 Constitutional rights as guaranteed by the Fifth,
3 Sixth, and Fourteenth Amendment to the United States
4 Constitution.

5 Q. Did you rely on [REDACTED] and your
6 other assistants to properly schedule these minor
7 girls in a way so that they would not come in
8 contact with one another?

9 MR. BURMAN: Object to form.

10 THE WITNESS: I intend to respond to all
11 relevant questions regarding this lawsuit.
12 However, at the present time my attorneys have
13 counseled me that I cannot provide answers to
14 any questions relevant to this lawsuit, and I
15 must accept their advice or risk losing my
16 Sixth Amendment Right to effective
17 representation.

18 So, accordingly, I assert my
19 Constitutional rights as guaranteed by the
20 Fifth, Sixth and Fourteenth Amendments to the
21 United States Constitution.

22 MR. EDWARDS: Ready to break?

23 MR. GOLDBERGER: He wants to eat.

24 THE VIDEOGRAPHER: We're off the record at
25 1:12.

1 Q. (By Mr. Edwards) Have you ever treated
2 with any doctors or physicians and discussed sexual
3 issues with them?

4 THE WITNESS: I intend to respond to all
5 relevant questions regarding this lawsuit.
6 However, at the present time my attorneys have
7 counseled me that I cannot provide answers to
8 any questions relevant to this lawsuit, and I
9 must accept this advice or risk losing my Sixth
10 Amendment right to effective representation.

11 Accordingly, I assert my Federal
12 Constitutional rights as guaranteed by the
13 Fifth, Sixth, and Fourteenth Amendment to the
14 United States Constitution.

15 Q. (By Mr. Edwards) Did you and your
16 assistants or employees use the word work, W-O-R-K,
17 to describe you engaging in sex acts with minors at
18 your house?

19 A. I intend to respond to all relevant
20 questions regarding this lawsuit. However, at the
21 present time my attorneys have counseled me that I
22 cannot provide answers to any questions relevant to
23 this lawsuit, and I must accept their advice or risk
24 losing my Sixth Amendment right to effective
25 representation.

1 (Thereupon, a lunch break was taken
2 from 1:12 to 2:32 p.m.)

3 THE VIDEOGRAPHER: We're back on record at
4 2:32.

5 MR. EDWARDS: Ready?

6 MR. GOLDBERGER: Sure.

7 Q. (By Mr. Edwards) Mr. Epstein, did you
8 ever care about any of the feelings of the minor
9 girls that you were engaging in sex with?

10 MR. BURMAN: Object to the form.

11 THE WITNESS: I intend to respond to all
12 relevant questions regarding this lawsuit.
13 However, at the present time my attorneys have
14 counseled me that I cannot provide answers to
15 any questions relevant to this lawsuit at this
16 time, so I must accept their advice or I lose
17 potential -- I risk losing my Sixth Amendment
18 right to effective representation.

19 And accordingly, I have to assert my
20 Federal Constitutional rights as guaranteed by
21 the Fifth, Sixth and Fourteenth Amendment to
22 the United States Constitution.

23 Q. (By Mr. Edwards) Did it ever occur to you
24 that any of these girls were somebody's daughter --

25 MR. BURMAN: Object to the form.

1 Q. (By Mr. Edwards) -- when you were
2 engaging in sex with them?

3 MR. BURMAN: Object to the form of the
4 question.

5 THE VIDEOGRAPHER: I intend to respond to
6 all relevant questions regarding this lawsuit.

7 However, at the present time my attorneys have
8 counseled me that I cannot provide answers to
9 these questions, as I have to accept their
10 advice or risk losing my Sixth Amendment right
11 to effective representation, Brad.

12 THE WITNESS: Is it okay if I call you
13 Brad?

14 MR. EDWARDS: You can continue.

15 THE WITNESS: And, accordingly, I assert
16 my Federal Constitutional rights as guaranteed
17 by the Fifth, Sixth and Fourteenth Amendment to
18 the United States Constitution.

19 Q. (By Mr. Edwards) When you were digitally
20 penetrating these minor girls, did you care about
21 the fact that you were emotionally or
22 psychologically hurting them?

23 MR. BURMAN: Object to the form of the
24 question.

25 THE WITNESS: I intend to respond to all

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

7 Accordingly, I assert my Federal
8 Constitutional rights as guaranteed by the
9 Fifth, Sixth, and Fourteenth Amendments to the
10 United States Constitution.

11 Q. (By Mr. Edwards) We have heard over and
12 over again that you intend to respond to this. When
13 do you intend to respond to these questions?

14 MR. BURMAN: Object to the form.

15 THE WITNESS: I intend to respond to all
16 relevant questions regarding this lawsuit.
17 However, at the present time on advice of
18 counsel I cannot provide answers to those
19 questions at this time. I must accept advice
20 of my counsel or risk losing my Sixth Amendment
21 right to effective representation.

22 Accordingly, I'll have to assert my
23 Federal Constitutional rights as guaranteed by
24 the Fifth, Sixth, and Fourteenth Amendment to
25 the United States Constitution.

1 Q. (By Mr. Edwards) Isn't it true that at
2 the time that you were sexually battering these
3 minor girls, you didn't care what happened to them
4 and only cared about your only personal sexual
5 gratification?

6 MR. BURMAN: Object to the form. We need
7 to talk outside.

8 THE WITNESS: Me, too?

9 THE VIDEOGRAPHER: We're off the record at
10 2:35.

11 (Thereupon, a brief break was taken.)

12 THE VIDEOGRAPHER: We're back on the
13 record at 2:36.

14 MR. BURMAN: For the purposes of the
15 record, I will tell you that this line of
16 questioning, in my view, is way beyond the
17 bounds of permissible discovery-type questions,
18 and nothing but pure argument, and if you
19 continue in this vein, I will stop the
20 deposition and we will seek instruction from
21 Judge Hafele about what's permissible and
22 what's not.

23 Q. (By Mr. Edwards) Isn't it true that at
24 the time you were inserting your fingers into the
25 vagina of these little kids, all you cared about was

1 your own sexual gratification?

2 MR. BURMAN: The deposition is over.

3 THE VIDEOGRAPHER: Conclude at 2:37, end
4 of tape 2 of 2.

5 MR. BERGER: We're going to order instant
6 copy, and we want the tape, also,
7 Mr. Videographer.

8 MR. BURMAN: We want this as soon as they
9 get theirs, we want ours.

10 (Thereupon, the deposition was
11 adjourned at 2:38 p.m.)

1 CERTIFICATE OF OATH
 2 STATE OF FLORIDA)
 3 : SS
 4 COUNTY OF PALM BEACH)

5 I, the undersigned authority, certify that
 6 JEFFREY EPSTEIN personally appeared before me and
 7 was duly sworn.
 8 WITNESS my hand and official seal this 1st
 9 day of May, 2009.

10
 11
 12 _____
 13 LINDA P. AUKAMP, RPR
 14 Commission No.: DD 499271
 15 Notary Public - State of Florida
 16 My Commission Expires: 12-26-09
 17
 18
 19
 20
 21
 22
 23
 24
 25

1 TO: JEFFREY EPSTEIN
 c/o JOHN MICHAEL BURMAN, ESQUIRE
 2 515 North Flagler Drive, Suite 400
 West Palm Beach, Florida 33401

3 RE: E.W. vs. JEFFREY EPSTEIN and [REDACTED]
 4 [REDACTED]

5
 6
 7 At the conclusion of your deposition given
 in the above-styled cause you indicated you wished
 to read and sign the transcript.

8
 9 This letter is to advise you that your
 deposition is ready, and we ask that you call our
 office at (561) 471-2995 at your earliest
 convenience for an appointment to come in.

10 If you are a party in this action and your
 attorney has ordered a copy of this transcript, you
 may wish to read his copy and forward to us a
 photostatic copy of your signed correction sheet.

11
 12
 13 It is necessary that you do this as soon
 as possible, since the transcript cannot be held
 beyond two weeks from the date of this letter.

14
 15 If you have any reason which you would
 like for me to place on your deposition as to your
 failure to sign the same, please advise.

16 Thank you for your prompt attention.

17
 18 Very truly yours,
 19 PALM BEACH REPORTING SERVICE, INC.
 1665 Palm Beach Lakes Blvd.,
 Suite 1001
 West Palm Beach, Florida 33401

20 BY: LINDA P. AUKAMP, RPR

21 Date: May 1st, 2009
 22
 23
 24
 25

1 REPORTER'S DEPOSITION CERTIFICATE
 2 STATE OF FLORIDA)
 3 [REDACTED]
 4 COUNTY OF PALM BEACH)

5 I, LINDA P. AUKAMP, a Registered
 6 Professional Reporter, certify that I was authorized
 7 to and did stenographically report the deposition of
 8 JEFFREY EPSTEIN; that a review of the transcript was
 9 requested; and that the transcript is a true and
 10 complete record of my stenographic notes.

11 I FURTHER CERTIFY that on the 1st day of
 12 May, 2009, I notified JOHN MICHAEL BURMAN, ESQUIRE
 13 that the deposition of JEFFREY EPSTEIN was ready for
 14 reading and signing by the witness.

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

21 Dated this 1st day of May, 2009.

22 _____
 23 LINDA P. AUKAMP, RPR
 24
 25

1 CORRECTION SHEET:

2 NAME: JEFFREY EPSTEIN

3 RE: E.W. vs. JEFFREY EPSTEIN and [REDACTED]
 4 [REDACTED]

5 The following corrections, additions or
 6 deletions were noted on the transcript of the
 7 testimony which I gave in the above-captioned matter
 held on April 30th, 2009:
 8 PAGE(S) LINE(S) SHOULD READ
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22 SIGNATURE: _____

23 DATE: _____
 24
 25