

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendants.

Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,
08-80994, 08-80811, 08-80893, 09-80469,
09-8-591, 09-80656, 09-80802, 09-81092

VOLUME III

CONTINUED VIDEOTAPED DEPOSITION OF
JEFFREY EPSTEIN
TAKEN ON BEHALF OF THE PLAINTIFF

DATE: April 14, 2010

U.S. Legal Support
[REDACTED]

EFTA01103374

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1 The continued videotaped deposition of
 2 JEFFREY EPSTEIN in the above-entitled and
 3 numbered cause, was taken before me, TERRI
 4 BECKER, a Registered Professional Reporter and
 5 Notary Public for the State of Florida at Large,
 6 at 444 West Railroad Avenue, in the City of West
 7 Palm Beach, Palm Beach County, in the State of
 8 Florida, beginning at the hour of 10:22 o'clock
 9 a.m., pursuant to the Notice and Adjournment in
 10 said cause for the taking of said deposition, on
 11 behalf of the PLAINTIFF in the above-entitled
 12 action pending in the above-named court.
 13 The appearances at said time and place
 14 were as follows:
 15 FARMER, JAFFE, WEISSING, EDWARDS,
 16 FISTOS & LEHRMAN, PL
 17 Attorneys for Plaintiffs Jane Does,
 18 L.N. and E.W.
 19 425 North Andrews Avenue
 20 Suite 2
 21 Fort Lauderdale, Florida 33301
 22 Tel: [REDACTED]
 23 BY: BRADLEY J. EDWARDS, ESQ.
 24
 25 MERMELSTEIN & HOROWITZ, P.A.
 Attorneys for Plaintiffs Jane Does,
 numbers 2 through 8
 18205 Biscayne Boulevard
 Suite 2218
 Miami, Florida 33160
 Tel: [REDACTED]
 BY: ADAM D. HOROWITZ, ESQ.

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1 APPEARANCES (CONTINUED)
 2
 3 PODHURST, ORSECK
 4 Attorneys for Jane Does 1 and 3
 5 City National Bank Building, Suite 88
 6 25 West Flagler Street
 7 Miami, Florida 33130
 8 Tel: [REDACTED]
 9 BY: KATHERINE W. EZELL, ESQ.
 10
 11 BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
 12 Attorneys for Defendant Jeffrey Epstein
 13 303 Banyon Boulevard,
 14 Suite 400
 15 West Palm Beach, Florida 33401
 16 Tel: [REDACTED]
 17 BY: MICHAEL PIKE, ESQ.
 18
 19 ALSO PRESENT:
 20
 21 JOE ROVNER, Videographer
 22 (U.S. Legal)
 23
 24
 25

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1 THEREUPON,
 2 JEFFREY EPSTEIN
 3 being by Terri Becker first duly sworn to tell
 4 the whole truth, as hereinafter certified,
 5 testified as follows:
 6 CONTINUED DIRECT EXAMINATION
 7 BY MR. HOROWITZ:
 8 Q Mr. Epstein, you understand we are
 9 continuing your deposition from Part One which
 10 was taken on March 8, 2010?
 11 A Yes.
 12 Q When we were together on March 8th, you
 13 told us at that time that you were on probation
 14 in the State of Florida. Is that still the
 15 case?
 16 A Yes.
 17 Q I believe you also told us part of the
 18 term of your sentence was that you were not
 19 allowed unsupervised contact with anyone under
 20 the age of 18. Is that still the case?
 21 A Yes.
 22 Q At that time, you told us that you're
 23 restricted from possessing pornographic
 24 material. Is that still the case?
 25 A Yes.

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1 **Q** At that time you told us you were a
2 registered sex offender in the State of Florida.
3 Is that still the case?
4 A Yes.
5 **Q** At that time you told us you lived at
6 358 El Brillo Way. Is that still the case?
7 A On advice of counsel, sir, I'm going to
8 have to invoke my Sixth, Fifth and Fourteenth
9 Amendment rights.
10 **Q** I'm going to hand you a document which
11 we will mark as Exhibit 2. We had marked Exhibit
12 1 at our first session.
13 (Multi-page document was marked as
14 Plaintiff's Exhibit number 2 for
15 identification, as of this date.)
16 **Q** (Handing.)
17 I'm going to ask you to please turn to
18 page 6. Turn to where it says "Affirmative
19 Defenses." Do you see where we are?
20 A Yes.
21 **Q** Paragraph one, under the words
22 "Affirmative Defenses" says "As to all counts,
23 plaintiff actually consented to and was a willing
24 participant in the acts alleged, and therefore
25 her claims are barred or her damages are required

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1 to be reduced accordingly." This I'll tell you
2 was filed in the case of [REDACTED]; do you understand
3 that?
4 A Yes.
5 **Q** Have you seen this document before?
6 A Not to my recollection, no.
7 **Q** This statement that plaintiff [REDACTED]
8 actually consented to and was a willing
9 participant in the acts alleged; is that a true
10 statement?
11 A Sir, at least today I would like to
12 answer each one of your questions, but I'm going
13 to have to, on advice of counsel, invoke my
14 rights of the Sixth, Fifth and Fourteenth
15 Amendment.
16 **Q** What facts do you have to support this
17 contention here that plaintiff [REDACTED] actually
18 consented to and was a willing participant in the
19 acts alleged?
20 MR. PIKE: Form.
21 A Though I would like to answer each and
22 every one of your questions here today, Mr.
23 Horowitz, unfortunately today on the advice of
24 counsel, I will have to refuse to answer and
25 invoke my rights under the Sixth, Fourteenth and

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1 Fifth Amendment.
2 **Q** Isn't it try neither you or anyone you
3 know has facts to support your contention that
4 [REDACTED] consented to and was a willing participant
5 in the acts alleged?
6 MR. PIKE: Form.
7 A As you know I would really like to
8 answer that question, but at least today, I
9 cannot. I am going to have to invoke my rights
10 on advice of counsel under the Fifth, Fourteenth
11 and Sixth Amendment.
12 **Q** Okay, moving down to paragraph two, it
13 says, in part, "as to all counts alleged
14 plaintiff [REDACTED] actually consented to and
15 participated in conduct similar and/or identical
16 to the acts alleged with other persons, which
17 were the sole or contributing cause of
18 plaintiff's alleged damages."
19 My question for you is, what facts are
20 you aware of to support your contention that [REDACTED]
21 consented to and participated in conduct similar
22 to and/or identical to the acts alleged in this
23 lawsuit?
24 MR. PIKE: Form.
25 A Unfortunately I would like to answer

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1 each of your questions here today, Mr. Horowitz,
2 but on advice of counsel, at least today, I have
3 to assert my rights under the Fourth, Fifth and
4 Sixth Amendment.
5 **Q** Isn't it true, sir, that you that this
6 contention that [REDACTED] consented to or participated
7 in conduct similar to the acts alleged in this
8 lawsuit with other persons? That's a false
9 statement; isn't that true?
10 MR. PIKE: Form.
11 A Mr. Horowitz, I believe you already know
12 the answer to most of these questions. I would
13 like to give them, but however, at least today on
14 advice of my counsel I have to assert my rights
15 under the Sixth, Fourteenth and Fifth Amendment.
16 **Q** Isn't it true, sir, you're not aware of
17 who has facts anyone to support the statement
18 that [REDACTED] consented to and participated in
19 similar or identical acts with other persons?
20 MR. PIKE: Form.
21 A Though I would like to answer that
22 question, as I would like to answer all of your
23 questions, at least today my counsel has advised
24 me that I must assert my rights under the Sixth,
25 Fifth and Fourteenth Amendments.

1 Q Sir, please turn to paragraph three of
2 defendant Epstein's first Amended Answer and
3 Affirmative Defenses.

4 A Same page?

5 Q Yes, paragraph three.

6 A Okay.

7 Q Do you see it says "As to all counts
8 plaintiff impliedly consented to the acts alleged
9 by not objecting."

10 My question for you is, what facts do
11 you have to support your contention that
12 plaintiff [REDACTED] impliedly consented to the acts
13 alleged by not objecting?

14 MR. PIKE: Form. And all of these
15 questions call for a legal conclusion, as
16 well.

17 A Though I would like to answer that
18 question, as I would like to answer all of your
19 questions here today, on advice of my counsel,
20 I'm going to have to assert my rights today of
21 the Sixth, Fifth and Fourteenth Amendment.

22 Q Isn't it true, sir, that you're not
23 aware of any facts to support your contention
24 that the plaintiff, [REDACTED] consented to the acts
25 alleged by not objecting; isn't that true, sir?

1 MR. PIKE: Form?

2 A Can you repeat the question, I'm sorry?

3 Q Isn't it true you're not aware of any
4 facts to support this contention that [REDACTED]
5 consented to the acts alleged by not objecting?

6 MR. PIKE: Form.

7 A At least today, Mr. Horowitz, I'm going
8 to have to assert my rights under the Sixth,
9 Fifth and Fourteenth Amendment not to answer that
10 question, though I would like to.

11 Q Isn't it true, sir, you're not aware of
12 anyone who has facts to support the contention
13 that [REDACTED] consented to the acts alleged by not
14 objecting?

15 MR. PIKE: Form.

16 A Mr. Horowitz, I would like to answer
17 your question but at least today, under advice of
18 counsel, I have to assert my rights under the
19 Sixth, Fifth and Fourteenth Amendment.

20 Q Turning to paragraph four, immediately
21 following the paragraph... It says "Defendant
22 reasonably believed or was told that plaintiff
23 had attained the age of 18 years old at the time
24 of the alleged acts"? Isn't it true, sir, that's
25 not a true statement, is it? You knew that [REDACTED]

1 was not 18 years old at the time of the alleged
2 acts?

3 MR. PIKE: Form.

4 A Though I would like to answer that
5 question, as I would like to answer every
6 one of your questions here today, on advice of
7 counsel I'm going to have to assert my rights
8 under the Sixth, Fifth and Fourteenth Amendment,
9 sir.

10 Q Mr. Epstein, what facts are you aware of
11 to support your contention that [REDACTED] had attained
12 the age of 18 years old at the time of the
13 alleged acts?

14 MR. PIKE: Same objection.

15 A Though I would like to answer that
16 question, Mr. Horowitz, I'm going to have to
17 respond the same way I've responded to all of
18 your questions here today; by asserting my rights
19 on advice of counsel under the Sixth, Fifth and
20 Fourteenth Amendment.

21 Q Isn't it true, sir, you had no reason to
22 believe that [REDACTED] was 18 or older at the time of
23 the acts alleged?

24 MR. PIKE: Form.

25 A Unfortunately, though I would like to

1 answer that question, Mr. Horowitz, on advice of
2 my counsel I'm going to have to assert my rights
3 under the Sixth, Fifth and Fourteenth Amendment.

4 Q Turning to paragraph five of your
5 Amended Answer to [REDACTED]'s lawsuit, it says: "As
6 to all counts, plaintiff's claims are barred, as
7 she said she was 18 years or older at the time."

8 Now, Mr. Epstein, that's not a true
9 statement, is it?

10 MR. PIKE: Form.

11 A I would like to answer every one of your
12 questions with respect to [REDACTED] however, at least
13 today, Mr. Horowitz, I'm going to have to assert
14 my rights under the Sixth, Fifth and Fourteenth
15 Amendment on advice of my counsel.

16 Q Mr. Epstein, [REDACTED] never told you she was
17 18 years of age or older; isn't that true?

18 MR. PIKE: Form.

19 A Though I would like to answer every
20 question regarding [REDACTED], at least today I have to
21 assert my rights under the Sixth, Fifth and
22 Fourteenth Amendment, sir, under advice of
23 counsel.

24 Q Mr. Epstein, you've had a chance now to
25 review the Affirmative Defenses one through five,

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1 which were filed on your behalf in this lawsuit.
2 Do you have any facts to support the contentions
3 in any of those Affirmative Defenses?
4 MR. PIKE: Form.
5 A At least today I'm going to have to
6 respond by asserting my rights under the Sixth,
7 Fifth and Fourteenth Amendment, on advice of
8 counsel.
9 Q I will take back Exhibit 1 -- pardon me,
10 Exhibit 2, and I'm going to hand you what we will
11 mark as Exhibit 3.
12 (Multi-page document was marked as
13 Plaintiff's Exhibit number 3 for
14 identification, as of this date.)
15 Q I'm going to hand you and your
16 attorney --
17 MR. HOROWITZ: I have extras.
18 Q -- defendant Epstein's First Amended
19 Answer and the Affirmative Defenses to
20 plaintiff's Second Amended Complaint. Do you see
21 that in front of you?
22 A Yes, sir.
23 Q Have you seen that before?
24 A No, sir.
25 Q I'm going to ask you to turn to page 6,

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1 the page numbers are at the top, and do you see
2 the words "Affirmative Defenses"?
3 A Yes, sir.
4 Q Paragraph one includes the following
5 statements --
6 MR. PIKE: Can we -- it appears that
7 paragraphs one through five are the same.
8 Would that be correct, as the ones you just
9 previously read?
10 MR. HOROWITZ: Yes.
11 MR. PIKE: Do you want to stipulate that
12 the answers would be the same and the
13 invocations of the Fifth, Sixth and
14 Fourteenth would be the same, as well as my
15 form objections?
16 MR. HOROWITZ: Well, I need to ask the
17 questions as to each client.
18 MR. PIKE: So, you do not want to
19 stipulate to that?
20 MR. HOROWITZ: I'll stipulate that you
21 have a standing objection, but I need to ask
22 the questions and get them on record.
23 MR. PIKE: All right, we will just go
24 through it. Okay.
25 Q As to Jane Doe 3, do you see in

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1 paragraph one it says, "As to all counts,
2 plaintiff actually consented to and was a willing
3 participant in the acts alleged." Do you see
4 that portion of paragraph one?
5 A Yes, sir.
6 Q The statement here that the plaintiff,
7 Jane Doe number 3 consented to and was a willing
8 participant in the acts alleged; that's not a
9 true statement, is it?
10 MR. PIKE: Form.
11 A Who is Jane Doe 3?
12 Q You don't know who Jane Doe 3 is?
13 A I do not. Don't you?
14 Q I do, I'll pull up the list here. There
15 are a number of cases, as you're aware.
16 Off the record for a second.)
17 THE VIDEOGRAPHER: Off the video record
18 at 10:35 a.m.
19 (Pause in the proceedings.)
20 THE VIDEOGRAPHER: Back on the video
21 record 10:40 a.m.
22 Q Mr. Epstein, [REDACTED] is Jane Doe 3. You
23 have in front of you the Amended Answer and
24 Affirmative Defenses filed in response to Jane
25 Doe 3's lawsuit?

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1 A Yes, sir.
2 Q We marked that as Exhibit 3. Turning to
3 affirmative defense paragraph number one, do you
4 see where it says "Plaintiff actually consented
5 to and was a willing participant in the acts
6 alleged" in paragraph one; do you see that?
7 MR. PIKE: Form. The document speaks
8 for itself.
9 Q Do you see where I'm pointing you to? I
10 want to make sure we are on the same page.
11 A Yes, I do.
12 Q The statement that Jane Doe number 3,
13 [REDACTED] consented to and was a willing participant
14 in the acts alleged; is that a true statement?
15 MR. PIKE: Form.
16 A Mr. Horowitz, I would like to answer
17 every question about [REDACTED] here today, however on
18 advice of counsel they've instructed me to assert
19 my rights under the Sixth, Fifth and Fourteenth
20 Amendment.
21 Q Mr. Epstein, what facts do you know of
22 to support the statements that [REDACTED] actually
23 consented to and was a willing participant in the
24 facts alleged?
25 MR. PIKE: Form.

1 **Q The acts alleged.**
 2 MR. PIKE: Form.
 3 A I would like to answer every question
 4 about [REDACTED] however, at least today on advice of
 5 counsel, they've instructed me that I must assert
 6 my rights under the Sixth, Fifth and Fourteenth
 7 Amendment.
 8 **Q Isn't it true, sir, you are not aware of**
 9 **anyone who has facts to support the statement**
 10 **that [REDACTED] consented to and was a willing**
 11 **participant in the acts alleged?**
 12 MR. PIKE: Form.
 13 A I would like to answer every question
 14 about [REDACTED] however, today under advice of
 15 counsel, I cannot. They've instructed me to
 16 assert my rights under the Sixth, Fifth and
 17 Fourteenth Amendment.
 18 **Q Turning to paragraph two, it says:**
 19 **"Plaintiff, [REDACTED] actually consented to and**
 20 **participated to conduct similar and/or identical**
 21 **to acts alleged with other persons, which were**
 22 **the sole or contributing cause of plaintiff's**
 23 **alleged damages." Sir, that's not a true**
 24 **statement, is it?**
 25 MR. PIKE: Form.

1 A I would like to answer every question
 2 about [REDACTED] today, Mr. Horowitz, however, on
 3 advice of counsel, they've instructed me I must
 4 assert my rights under the Sixth, Fifth and
 5 Fourteenth Amendment.
 6 **Q Mr. Epstein, what facts do you know of**
 7 **to support the statement that [REDACTED] actually**
 8 **consented to and participated in conduct similar**
 9 **and/or identical to the acts alleged with other**
 10 **persons?**
 11 MR. PIKE: Form, and once again this
 12 line of questioning calls for a legal
 13 conclusions, as well as work product
 14 information.
 15 A Though I would like to answer each and
 16 every question about [REDACTED] today unfortunately my
 17 counsel has advised me I must assert my rights
 18 under the Sixth, Fifth and Fourteenth Amendment.
 19 **Q Isn't it true, sir, you're not aware of**
 20 **anyone who has facts to support the contention**
 21 **that [REDACTED] consented to and participated in**
 22 **conduct similar and/or identical to the acts**
 23 **alleged with other persons?**
 24 MR. PIKE: Form.
 25 A Though I would like to answer every

1 question you have here today, Mr. Horowitz,
 2 regarding your client, [REDACTED] on advise of my
 3 counsel, at least today I must assert my rights
 4 under the Sixth, Fifth and Fourteenth Amendment.
 5 **Q Turning to paragraph three of your**
 6 **Affirmative Defenses, it says "Plaintiff [REDACTED],**
 7 **impliedly consented to the acts alleged by not**
 8 **objecting." Do you see that?**
 9 A Yes.
 10 **Q The first part of that sentence?**
 11 A Yes, sir.
 12 **Q That's not a true statement, is it,**
 13 **sir?**
 14 MR. PIKE: Form.
 15 A Though I would like to answer every
 16 question about [REDACTED] every single question,
 17 unfortunately today my counsel has advised me
 18 that I must assert my rights under the Sixth,
 19 Fifth and Fourteenth Amendment.
 20 **Q Sir, what facts do you have to support**
 21 **your contention that [REDACTED] impliedly consented to**
 22 **the acts alleged by not objecting?**
 23 MR. PIKE: Form.
 24 A Though I would like to answer every
 25 question about [REDACTED] that you pose here today, Mr.

1 Horowitz, at least today, unfortunately my
 2 counsel advised me that I must assert my rights
 3 under the Sixth, Fifth and Fourteenth Amendment.
 4 **Q Isn't it true, sir, you're not aware of**
 5 **anyone who has facts to support your statement**
 6 **that [REDACTED] impliedly consented to the acts alleged**
 7 **by not objecting?**
 8 MR. PIKE: Form?
 9 A Mr. Horowitz, I would like to answer
 10 every question about [REDACTED] I really would.
 11 However, today my counsel has advised me that I
 12 must assert my Sixth, Fifth and Fourteenth
 13 Amendment rights.
 14 **Q Turning to paragraph four of your**
 15 **Affirmative Defenses, Mr. Epstein, it says "As to**
 16 **all counts, defendant reasonably believed or was**
 17 **told that the plaintiff had attained the age of**
 18 **18 years old at the time of the alleged acts."**
 19 **That's not a true statement, is it, sir?**
 20 MR. PIKE: Form.
 21 A I would like to answer every question
 22 about [REDACTED] that you've posed here today.
 23 However, on advice of my counsel, I must assert
 24 my rights under the Sixth, Fifth and Fourteenth
 25 Amendment, at least today.

1 Q Isn't it true, sir, isn't it true that
2 you knew that [REDACTED] was under the age of 18 when
3 she came to your home; isn't that true, sir?

4 MR. PIKE: Form.

5 A I would like to answer every question
6 about [REDACTED]. However, at least today my counsel
7 has advised me I must assert my rights under the
8 Sixth, Fifth and Fourteenth Amendment.

9 Q Isn't it true, sir, that you had no
10 reason to believe that [REDACTED] was under 18?

11 MR. PIKE: Form.

12 A Can you repeat that question?

13 Q Glad you asked. Isn't it true, sir, you
14 had no reason to believe that [REDACTED] was 18 years
15 old or older?

16 MR. PIKE: Form.

17 A I would like to answer every question
18 about [REDACTED] and her -- the question you just
19 asked, however at least today, my counsel has
20 advised me that I must assert my rights under the
21 Sixth, Fifth and Fourteenth Amendment.

22 Q Isn't it true, sir, that [REDACTED] never told
23 you that she was under the age of 18?

24 A Form.

25 MR. PIKE: Form.

1 containing markings in Exhibit number 3.)

2 Q I'm going to hand to you the answer and
3 Affirmative Defenses, Amended Answer and
4 Affirmative Defenses that you filed in the
5 lawsuit filed by [REDACTED]; do you have that in front
6 of you? Jane Doe number 4.

7 A Yes, sir.

8 Q I'll ask you to turn to page 6 where
9 you'll see the words "Affirmative Defenses" near
10 the top of the page?

11 MR. PIKE: This is Exhibit 4?

12 MR. HOROWITZ: Correct, Exhibit 4.

13 (Multi-page document was marked as
14 Plaintiff's Exhibit number 4 for
15 identification, as of this date.)

16 THE WITNESS: Can we take a two-second
17 break??

18 MR. HOROWITZ: Sure.

19 THE VIDEOGRAPHER: Off the video record
20 at 10:48 a.m.

21 (Pause in the proceedings.)

22 MR. HOROWITZ: Back on the record.

23 THE VIDEOGRAPHER: Back on the video
24 record 10:49 a.m.

25 Q Do you have the Affirmative Defenses in

1 MR. HOROWITZ: Strike that.

2 Q Isn't it true, sir, [REDACTED] never told you
3 she was 18 years or older? Isn't that true,
4 sir?

5 A I would like to answer every question
6 you have today regarding [REDACTED] and what she told
7 me. However, today my counsel has advised me I
8 must assert my rights under the Sixth, Fifth and
9 Fourteenth Amendment.

10 Q Okay, paragraph five says the
11 plaintiff's claims are barred as she said she was
12 18 years or older at the time.

13 Sir, that's not a true statement, is
14 it?

15 MR. PIKE: Form.

16 A I would like to tell you exactly what
17 [REDACTED] said, however, my counsel has advised me to
18 say that I must assert my rights under the Sixth,
19 Fifth and Fourteenth Amendment.

20 MR. PIKE: I wrote on your exhibit, page
21 3.

22 MR. HOROWITZ: We will substitute a
23 different one.

24 MR. PIKE: Yes, it is just checkmarks.

25 (Clean copy was substituted for the page

1 front of you, and the answer you filed in the
2 [REDACTED] case, correct?

3 A That's correct.

4 Q Paragraph one includes the following
5 statement: "As to all counts, plaintiff [REDACTED]
6 actually consented to and was a willing
7 participant in the acts alleged." That's not a
8 true statement, is it, sir?

9 MR. PIKE: Form.

10 A I believe her deposition of [REDACTED] speaks
11 to this issue.

12 Q Do you agree with [REDACTED]'s testimony that
13 she was at your home?

14 MR. PIKE: Form.

15 A Unfortunately today, Mr. Horowitz,
16 though I would like to answer every question
17 about [REDACTED], I think her deposition speaks quite a
18 well with some of those issues, but at least,
19 with respect to my answering these questions
20 today with regard to [REDACTED] and these issues, my
21 counsel has advised me I must assert my rights
22 under the Sixth, Fifth and Fourteenth
23 Amendments.

24 Q Are you telling us that [REDACTED] in your
25 opinion, was truthful in her deposition?

1 MR. PIKE: Form, misconstrues the
 2 witness's testimony. Move to strike.
 3 A I believe, sir, that -- though I would
 4 like to answer that question with respect to Ms.
 5 [REDACTED]'s deposition, my counsel has advised me at
 6 least today I must assert my rights under the
 7 Sixth, Fifth and Fourteenth Amendments.
 8 Q Sir, what did you mean when you said
 9 [REDACTED]'s testimony speaks to this issue"?
 10 MR. PIKE: Asked and answered.
 11 A I believe I said "deposition testimony."
 12 Q Yes, what did you mean by that, when you
 13 said "Her deposition testimony speaks to the
 14 issue"?
 15 MR. PIKE: Asked and answered, form.
 16 A On advice of counsel, I have to assert
 17 my rights under the Sixth, Fifth and Fourteenth
 18 Amendment, sir.
 19 Q What facts do you know of to support the
 20 statement that [REDACTED] actually consented to and was
 21 a willing participant in the acts alleged?
 22 MR. PIKE: Form.
 23 A I believe her deposition spoke to that
 24 directly, but however, myself, I'm going to have
 25 to assert my Sixth, Fifth and Fourteenth

1 Amendment rights under advice of counsel, sir.
 2 Q You read her deposition, correct?
 3 A No.
 4 Q You have not read her deposition?
 5 A No.
 6 Q But you believe her deposition testimony
 7 correctly speaks to the issue of the fact that
 8 she was a willing participant in the acts alleged
 9 with you?
 10 A That's not what I said.
 11 Q Why don't you tell me what you meant
 12 when you said, "Her deposition testimony speaks
 13 to the issue."
 14 A The deposition speaks for itself. Any
 15 other questions I'm sorry, Mr. Horowitz, but
 16 today I have to assert my rights under the Sixth,
 17 Fifth and Fourteenth Amendments.
 18 Q Isn't it true, sir, that you are not
 19 aware of anyone who has facts that support the
 20 statement that [REDACTED] consented to and was a
 21 willing participant in the acts alleged in her
 22 lawsuit?
 23 MR. PIKE: Form.
 24 A My understanding of her own testimony in
 25 her deposition speaks to that matter, but,

1 however, with respect to my own issues today, I
 2 am going to have to assert my rights on the
 3 advice of counsel, under the Sixth, Fifth and
 4 Fourteenth Amendments.
 5 Q Paragraph two in the Affirmative
 6 Defenses says, "As to all counts alleged
 7 plaintiff, [REDACTED] actually consented to and
 8 participated in similar conduct and/or identical
 9 to the acts alleged with other persons which were
 10 the sole or contributing cause to plaintiff's
 11 damages."
 12 Sir, you know that's not correct; is
 13 that correct?
 14 MR. PIKE: Form.
 15 A I believe her deposition, in her own
 16 words speaks to this issue, but as far as today
 17 my to that question answer unfortunately will
 18 have to be that I assert my rights under the
 19 Sixth, Fifth and Fourteenth Amendment on advice
 20 of counsel.
 21 Q Sir, isn't it true you're not aware of
 22 any facts to support your contention in this
 23 answer to the amended complaint that [REDACTED]
 24 consented to and participated in conduct similar
 25 and/or identical to the acts alleged with other

1 persons?
 2 MR. PIKE: Form?
 3 A I believe her deposition in her own
 4 words speaks to this exact question, but however,
 5 with respect to my answers today, unfortunately
 6 with respect to [REDACTED] though I would like to
 7 answer every question with respect to [REDACTED] on
 8 advice of counsel I have to assert my rights
 9 under the Fourteenth, Sixth and Fifth Amendment.
 10 Q Sir, my question was: What facts do you
 11 know to be true? Clarify for me. Are you saying
 12 that you are adopting what [REDACTED] says as true?
 13 MR. PIKE: Form, misconstrues the
 14 witness's testimony, and that is not exactly
 15 what your last question was, so I'm going to
 16 move --
 17 MR. HOROWITZ: Just to form --
 18 MR. PIKE: No, no, I'm not going to let
 19 the witness answer a question that's going
 20 to potentially waive any Constitutional
 21 privileges here, so it will not be just
 22 "form."
 23 Now, having said that, if you can repeat
 24 the question --
 25 MR. HOROWITZ: Can you repeat the

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1 question?
2 (Discussion off the record.)
3 **Q Are you suggesting to us you are**
4 **adopting what [REDACTED] says is true in her**
5 **deposition?**
6 MR. PIKE: Form.
7 A Sir, I would like to answer every
8 question with respect to [REDACTED]. However, today on
9 advice of counsel, I have to assert my rights
10 under the Fourteenth, Sixth and Fifth Amendment.
11 **Q In paragraph three of your Affirmative**
12 **Defenses, it says "As to all counts, plaintiff**
13 **[REDACTED] impliedly consented to the acts alleged by**
14 **not objecting."**
15 **Sir, that's not true, is it?**
16 MR. PIKE: Form.
17 A I believe her own testimony in her
18 deposition speaks to that, however, at least
19 today, Mr. Horowitz, I have to assert my rights
20 under the Sixth, Fifth and Fourteenth Amendment.
21 **Q What information do you have to support**
22 **your assertion that plaintiff [REDACTED] impliedly**
23 **consented to the acts alleged by not objecting?**
24 MR. PIKE: Form.
25 A Information separate from her own

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1 testimony? I -- with respect to any other
2 question, I'm going to have to assert my rights
3 under the Sixth, Fifth and Fourteenth Amendment
4 upon advice of counsel.
5 **Q Let's make sure we are on the same page,**
6 **then.**
7 A Please.
8 **Q Separate from her deposition**
9 **testimony --**
10 A Yes?
11 **Q -- my question is: Do you have any**
12 **facts to support your assertion that [REDACTED]**
13 **impliedly consented to the acts alleged by not**
14 **objecting?**
15 MR. PIKE: Form.
16 A Separate from her own testimony with
17 respect to her consenting, at least today, though
18 I would like to answer that question, I'm going
19 to have to assert my rights under the Sixth,
20 Fifth and Fourteenth Amendment upon advice of
21 counsel, sir.
22 **Q Okay, paragraph four of the Affirmative**
23 **Defenses says, "As to all counts, defendant**
24 **reasonably believed or was told that plaintiff**
25 **had attained the age of 18 years old." Did I**

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1 **read that correctly?**
2 MR. PIKE: Form. I'm going to instruct
3 him not to answer that question. Did you
4 read that correctly?
5 **Q Do you see where I am? Do you see where**
6 **I am, paragraph four?**
7 MR. PIKE: You can answer that question
8 as to whether or not you see where he is
9 identifying paragraph four in the document
10 in front of you.
11 A I don't think you read it completely,
12 did you?
13 **Q "As to all counts defendant reasonably**
14 **believed or was told the plaintiff had attained**
15 **the age of 18 years old at the time of the**
16 **alleged acts." Did I read that correctly now?**
17 MR. PIKE: I instruct you not to answer
18 that question. It is not formed right. Did
19 you read it correctly connotes an implied
20 potential waiver, did you read it correctly,
21 is it correct?
22 **Q Did I accurately read the statement in**
23 **your Affirmative Defenses?**
24 MR. PIKE: That is -- you can answer
25 that question.

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1 A Yes.
2 **Q Okay. Isn't it true, sir, that you**
3 **knew, you knew, that [REDACTED] was not 18 years old**
4 **before May of 2005; isn't that true?**
5 MR. PIKE: Form.
6 A Though I would like to answer every
7 question regarding [REDACTED] and what she said, at
8 least today upon advice of counsel, I have to
9 assert my rights under the Sixth, Fifth and
10 Fourteenth Amendment, sir.
11 **Q Isn't it true, sir, you had no reason to**
12 **believe up until May 2005 that [REDACTED] was 18 years**
13 **old or older?**
14 MR. PIKE: Form.
15 A Separate and apart from her own
16 testimony I believe on the subject, at least with
17 respect to today, to answer these questions I'm
18 going to have to assert my rights under the
19 Sixth, Fifth and Fourteenth Amendment on advice
20 of counsel.
21 **Q Isn't it true, sir, that prior to May of**
22 **2005, [REDACTED] never told you she was 18 years old or**
23 **older?**
24 MR. PIKE: Form.
25 A Though I would like to answer that

1 question with respect to what [REDACTED] told me, at
2 least today I'm going to have to assert my rights
3 under the Fourteenth, Sixth and Fifth Amendment
4 upon advice of counsel.

5 **Q As to paragraph five, states the**
6 **following: "Plaintiff's claims are barred as she**
7 **said she was 18 years or older at the time."**

8 **Sir, you know that's not true. That**
9 **never happened before May of 2005; isn't that**
10 **correct?**

11 MR. PIKE: Form.

12 A Though I would like to answer every
13 question with respect to what [REDACTED] said and did,
14 I, unfortunately today, have to assert my rights
15 under the Sixth, Fifth and Fourteenth Amendment
16 upon advice of counsel.

17 **Q I'm going to hand you what will be**
18 **marked as Exhibit 5, Defendant Epstein's First**
19 **Amended Answer in the Affirmative Defenses to**
20 **Plaintiff's Second Amended Complaint in the**
21 **lawsuit filed by [REDACTED]**

22 (Handing.)

23 (Multi-page document was marked as
24 Plaintiff's Exhibit number 5 for
25 identification, as of this date.)

1 **Q I'm going to ask you again to turn to**
2 **page 6 where it says "Affirmative Defenses."**

3 **Do you see where it says "Affirmative**
4 **Defenses"?**

5 A Um-hum.

6 **Q Paragraph one includes the following**
7 **statements: "As to all counts plaintiff actually**
8 **consented to and was a willing participant in the**
9 **acts alleged, and therefore her claims are barred**
10 **or her damages are required to be reduced**
11 **accordingly."**

12 **Sir, this statement that [REDACTED] consented**
13 **to and was a willing participant in the acts**
14 **alleged; that's not true, is it?**

15 MR. PIKE: Form.

16 A I believe her own deposition speaks to
17 that exact question, but at least as far as my
18 answers are concerned today, Mr. Horowitz,
19 unfortunately upon advice of my own counsel, I
20 have to assert my rights under the Sixth, Fifth
21 and Fourteenth Amendment.

22 **Q Do you agree with [REDACTED]'s statements with**
23 **regard to her activity at your home as stated in**
24 **her deposition testimony?**

25 MR. PIKE: Form, misconstrues the

1 witness's testimony?

2 A I would like to answer every single
3 question regarding [REDACTED]'s claims, every single
4 one, however, today, upon advice of counsel, at
5 least today, they've instructed me to assert my
6 rights under the Sixth, Fifth and Fourteenth
7 Amendment.

8 **Q Sir, what facts do you know of to**
9 **support the statement that [REDACTED] consented to and**
10 **was a willing participant in the acts alleged?**

11 MR. PIKE: Form.

12 A Separate and apart from her own
13 deposition testimony, I'm sorry, but I would like
14 to answer every question with respect to her
15 behavior -- can you repeat the question, sir?

16 **Q Sure. What facts do you know of to**
17 **support the statement that plaintiff, [REDACTED],**
18 **consented to, and was a willing participant in**
19 **the acts alleged?**

20 MR. PIKE: Form.

21 A Separate and apart from her own
22 testimony on the subject, I cannot answer today
23 that question, though I would like to. And upon
24 advice of counsel, I must assert my rights under
25 the Sixth, Fifth and Fourteenth Amendment.

1 **Q Isn't it true, sir, you're not aware of**
2 **anyone who has facts to support the statement**
3 **that A.C. consented to and was a willing**
4 **participant in the acts alleged?**

5 MR. PIKE: Form.

6 A Unfortunately -- I would like to answer
7 every question about [REDACTED]'s alleged participation
8 in any event. However, today, upon advice of
9 counsel I have been instructed that I must assert
10 my rights under the Sixth, Fifth and Fourteenth
11 Amendment.

12 **Q Sir, paragraph two of the Affirmative**
13 **Defenses says: "As to all counts alleged**
14 **plaintiff actually consented to and participated**
15 **in conduct similar and/or identical to the acts**
16 **alleged with other persons which were the sole or**
17 **contributing cause to plaintiff's alleged**
18 **damages."**

19 **Now, sir, that's not a true statement**
20 **that plaintiff consented to and participated in**
21 **similar acts with other persons, is it?**

22 MR. PIKE: Form.

23 A I would love to respond to every
24 question with respect to similar acts performed
25 by [REDACTED] with other people. However, at least

1 today upon advice of counsel I must assert my
2 rights under the Sixth, Fifth and Fourteenth
3 Amendment.

4 **Q Sir, what facts do you have to support**
5 **the assertion that [REDACTED] participated in conduct**
6 **similar and/or identical to the acts alleged in**
7 **her lawsuit against you, with other people?**

8 MR. PIKE: Form.

9 A Separate and apart from her own
10 deposition, her own testimony, I would like to
11 give all the facts with respect to [REDACTED]'s
12 behavior with other people. However, today my
13 counsel has advised me that I must assert my
14 rights under the Sixth, Fifth and Fourteenth
15 Amendment.

16 **Q Have you read her deposition testimony?**

17 MR. PIKE: Form.

18 A No.

19 **Q Have you listened to her deposition**
20 **testimony?**

21 A I don't recall.

22 **Q Am I accurate then, whatever you know**
23 **about her lawsuit is something your attorneys**
24 **have shared with you?**

25 MR. PIKE: Form.

1 **Q Or do you have it from another source?**

2 MR. PIKE: One second.

3 MR. HOROWITZ: You have to wait for the
4 question --

5 MR. PIKE: No.

6 MR. HOROWITZ: That's the way the rules
7 worked.

8 MR. PIKE: You're asking a question,
9 then you're pausing to elicit a response to
10 waive attorney/client privilege, okay? Then
11 you're jumping into another question. If
12 you would like me to sit in your chair and
13 teach you how to ask the questions, I will
14 be happy to do so.

15 MR. HOROWITZ: You couldn't teach me a
16 single thing.

17 MR. PIKE: However, today we're here for
18 you. We're here for you to ask your
19 questions. If you would like to break up
20 your questions, you can do so. But as to
21 that last question, I'm going to instruct
22 you not to answer, because, as you know, it
23 is attorney/client information. If you want
24 to try again, we're here all day.

25 **Q Sir, is it accurate to say that all**

1 **information you have about [REDACTED]'s testimony came**
2 **from your lawyers, or did you hear here it from**
3 **some other source?**

4 MR. PIKE: Form.

5 I'm going to instruct you not to answer
6 that question.

7 **Q Have you heard from any source other**
8 **than your attorneys what [REDACTED] testified about?**

9 MR. PIKE: You can answer that
10 question.

11 A No.

12 **Q Sir, paragraph three of your Affirmative**
13 **Defenses to [REDACTED]'s lawsuit says, "As to all**
14 **counts plaintiff impliedly consented to the acts**
15 **alleged by not objecting." Do you see that?**

16 A Yes, sir.

17 **Q Sir, you know that's not a true**
18 **statement, isn't it?**

19 MR. PIKE: Form.

20 A I would like to answer every question
21 with respect to [REDACTED] and what she did or alleged
22 to have done. However, today I have to assert my
23 rights under the, Sixth, Fifth and Fourteenth
24 Amendment, upon advice of counsel.

25 **Q Sir, what facts do you have to support**

1 **your assertion that [REDACTED] consented to the acts**
2 **alleged by not objecting?**

3 MR. PIKE: Form.

4 A Unfortunately any facts I might have, my
5 attorneys have counseled me I must assert my
6 rights under the Sixth, Fourteenth and Fifth
7 Amendment, so I must assert those rights today,
8 sir.

9 **Q Sir, isn't it true you're not aware of**
10 **anyone who has facts to support the statement**
11 **that A.C. consented to the acts alleged by not**
12 **objecting?**

13 MR. PIKE: Form.

14 A Though I would like to answer those
15 questions with respect to the facts about [REDACTED]
16 at least today my counsel has advised me I must
17 assert my rights under the Sixth, Fifth and
18 Fourteenth Amendment.

19 **Q Turning to paragraph four of the**
20 **Affirmative Defenses, isn't it true, sir, that**
21 **you knew that [REDACTED] was 18 years, was under 18**
22 **years old when she came to your home?**

23 MR. PIKE: Form?

24 A Though I would like to answer every
25 question about Ms. [REDACTED] I cannot, on advice of

1 counsel today, and they've asked me to assert my
2 rights under the Sixth, Fifth and Fourteenth
3 Amendment.

4 Q Isn't it true, sir, that you had no
5 reason to believe that [REDACTED] was 18 years or older
6 when she was at your home?

7 MR. PIKE: Form.

8 A Though I would like to answer every
9 question about [REDACTED] today, Mr. Horowitz,, my
10 counsel has advised me I must at least today
11 assert my rights under the Sixth, Fifth and
12 Fourteenth Amendment.

13 Q Isn't it true, sir, [REDACTED] never told you
14 she was 18 years old or older?

15 MR. PIKE: Form.

16 A Though I would like to answer that
17 question regarding what Ms. [REDACTED] told me, my
18 counsel has advised me that today I must assert
19 my rights under the Sixth, Fifth and Fourteenth
20 Amendment.

21 Q Isn't it true, sir, no one ever told you
22 that [REDACTED] was 18 years old or older when she was
23 at your home?

24 MR. PIKE: Form.

25 A Though I would like to answer that

1 today advised me I must assert my rights under
2 the Sixth, Fifth and Fourteenth Amendment.

3 Q Isn't it true, sir, there are no facts
4 that you're aware of to support the statement
5 that [REDACTED] consented to and was a willing
6 participant in the acts alleged?

7 MR. PIKE: Form.

8 A Though, the question of whether she was
9 a willing participant in the acts alleged, I
10 would really like to answer those questions with
11 respect to [REDACTED]. However, at least today my
12 counsel has advised me I must assert my rights
13 under the Sixth, Fifth and Fourteenth Amendment.

14 Q Turning to paragraph two of the
15 Affirmative Defenses, what facts do you have to
16 support your assertion that [REDACTED] consented to and
17 participated in conduct similar and/or identical
18 to the acts alleged with other persons?

19 MR. PIKE: Form.

20 A Though I would like to answer the
21 question about the acts that she's performed with
22 other persons similar to the ones alleged here,
23 at least today under advice of counsel, I have
24 been instructed to assert my rights under the
25 Sixth, Fifth and Fourteenth Amendment.

1 question, with respect to what people told me how
2 old she was or what she told me how old she was,
3 sorry, but my counsel advised me today I must
4 assert my rights under Sixth, Fifth and
5 Fourteenth Amendment.

6 Q Okay.

7 (Multi-page document was marked as
8 Plaintiff's Exhibit number 6 for
9 identification, as of this date.)

10 Q Moving on to Exhibit 6, Epstein's First
11 Amended Answer in Affirmative Defense is to make
12 his First Amended Complaint in the Jane Doe
13 number 6 case, and I'll hand you a copy of that
14 and represent to you that Jane Doe 6 is [REDACTED],
15 okay? I ask you to turn to page 6 -- I see
16 you've already done that, of the Affirmative
17 Defenses.

18 What facts do you have to support the
19 contention in paragraph one tha [REDACTED] consented
20 to and was a willing participant in the acts
21 alleged?

22 MR. PIKE: Form?

23 A Though I would like to answer the
24 question regarding what [REDACTED] consented to and how
25 she was a participant in the events, my counsel

1 Q Sir, you know that [REDACTED] never consented
2 to or participated in similar or identical acts
3 with other persons; isn't that right?

4 MR. PIKE: Form.

5 A I would very much like to answer that
6 question, very much. However, sir, at least
7 today my counsel has advised me I must assert my
8 rights under the Sixth, Fifth and Fourteenth
9 Amendment.

10 Q Sir, isn't it true you're not aware of
11 anyone who has facts to support your assertion
12 that [REDACTED] consented to or participated in similar
13 or identical acts with other persons?

14 MR. PIKE: Form.

15 A I'm sorry, can you read that question
16 back?

17 Q Sir, isn't it true you're not aware of
18 anyone who has facts to support your assertion
19 that [REDACTED] consented to and participated to
20 similar or identical acts with other people?

21 MR. PIKE: Form.

22 A Though I would like to answer that
23 question regarding does anyone else have
24 information with respect to [REDACTED] participating
25 with other people in similar acts as your



1 question posed, unfortunately, today, sir, I'm
2 going to have to assert my rights upon advice of
3 counsel under the Sixth, Fifth and Fourteenth
4 Amendment.

5 **Q Turning to paragraph three of your**
6 **Affirmative Defenses, sir, it is not a true**
7 **statement that [REDACTED] impliedly consented to the**
8 **acts alleged by not objecting, is it, sir?**

9 MR. PIKE: Form.

10 A The question regarding [REDACTED] implied
11 consent that you've just posed, I would like to
12 answer that question. I would like to answer all
13 the questions with respect to [REDACTED] that you've
14 posed here today. However, upon advice of
15 counsel I have to assert my rights under the
16 Sixth, Fifth and Fourteenth Amendment.

17 **Q Sir, what facts do you have to support**
18 **your contention that [REDACTED] consented to the acts**
19 **alleged by not objecting?**

20 MR. PIKE: Form.

21 A Though I would like to answer that
22 question regarding the facts that I have
23 regarding [REDACTED]'s consent, my attorneys have
24 advised me that today I have to assert -- at
25 least today, I have to assert my rights under the

1 Sixth, Fifth and Fourteenth Amendment.

2 **Q Sure, turning to paragraph four, it says**
3 **"As to all counts" -- strike that.**

4 **Isn't it true, sir, that you knew when**
5 **[REDACTED] was at your home that she was not 18 years**
6 **old?**

7 MR. PIKE: Form.

8 A I would like to answer the question
9 about [REDACTED], every question about [REDACTED] here today
10 that you've posed. However, upon advice of my
11 counsel they've advised me that I must assert my
12 rights under the Sixth, Fifth and Fourteenth
13 Amendment.

14 **Q Isn't it true, sir, you had no reason to**
15 **believe that [REDACTED] was 18 years of age or older?**

16 MR. PIKE: Form.

17 A The question regarding my reason to
18 believe [REDACTED] was 18 or over? I would really like
19 to answer that question, but however, today my
20 counsel has advised me I must assert my rights
21 under the Fifth, Sixth and Fourteenth Amendment,
22 sir.

23 **Q Isn't it true [REDACTED] never told you she**
24 **was 18 or older?**

25 A Though I would very much like to respond

1 to the question of what [REDACTED] told me, I would
2 like to respond to every question regarding [REDACTED].
3 my counsel has advised me that today at least, I
4 must assert my rights under the Sixth, Fifth and
5 Fourteenth Amendment.

6 **Q Isn't it true, sir, that you could**
7 **plainly tell by looking at [REDACTED] that she was not**
8 **18 years old?**

9 MR. PIKE: Form.

10 A Sir, I would like to answer that
11 question, as I would like to answer every other
12 question regarding your plaintiff, [REDACTED]. However
13 today on advice of counsel, they've instructed me
14 I must assert my rights under the Sixth, Fifth
15 and Fourteenth Amendment.

16 MR. PIKE: Form.

17 A Isn't it true, sir, no one told you [REDACTED]
18 was 18 years old or older.

19 MR. PIKE: Form.

20 A Though I would like to answer every
21 question of what people told me regarding [REDACTED]
22 allegedly, my counsel has instructed me I must
23 respond by asserting my Sixth, Fifth and
24 Fourteenth Amendment rights, sir.

25 **Q Sir, I'm going to hand you what we will**

1 mark as Exhibit 7. It is Defendant Epstein's
2 First Amended Answer and Affirmative Defenses to
3 Plaintiff's First Amended Complaint in Jane Doe 7
4 case filed by [REDACTED]

5 (Multi-page document was marked as
6 Plaintiff's Exhibit number 7 for
7 identification, as of this date.)

8 **Q I ask you to take a look at that,**
9 **please, and turn to page 6, of the Affirmative**
10 **Defenses.**

11 THE WITNESS: Take a five-minute break?

12 MR. HOROWITZ: Sure.

13 THE VIDEOGRAPHER: Off the record at
14 11:13 a.m.

15 (Pause in the proceedings.)

16 THE VIDEOGRAPHER: Back on the video
17 record 11:21 a.m.

18 **Q Mr. Epstein, do you have in front of you**
19 **the Affirmative Defenses filed in your behalf in**
20 **[REDACTED]'s lawsuit?**

21 A Yes.

22 **Q What facts do you have to support your**
23 **contention that [REDACTED] consented to and was a**
24 **willing participant in the acts alleged?**

25 MR. PIKE: Form.

1 A Separate and apart from her own
2 statements with regard to these issues, I would
3 like to answer every question here today with
4 respect to [REDACTED]. However upon advice of counsel,
5 at least today, I have to assert my rights under
6 the Sixth, Fifth and Fourteenth Amendment.

7 Q And is it your position that, well, tell
8 us if it is your position that [REDACTED] admitted to
9 consenting to and being a willing participant in
10 the acts alleged.

11 MR. PIKE: Form.

12 A Can you repeat the question?

13 Q Is it your position that [REDACTED] admitted
14 in her deposition testimony to having consented
15 to, and having been a willing participant in the
16 acts alleged?

17 A I think her deposition speaks for
18 itself, but anything beyond that, at least today,
19 Mr. Horowitz, I'm going to have to assert my
20 rights upon advice of counsel under the Sixth,
21 Fifth and Fourteenth Amendment.

22 Q Do you believe that [REDACTED] was accurate
23 when she, according to you, testified that she
24 consented to and was a willing participant in the
25 acts alleged?

1 MR. PIKE: Form.

2 A I would like nothing more than to
3 respond to everything [REDACTED] has to say. However,
4 at least today, upon advice of my counsel, I'm
5 going to have to assert my rights under the
6 Sixth, Fifth and Fourteenth Amendment.

7 Q Mr. Epstein, you know the statement that
8 [REDACTED] consented to and was a willing participant
9 in the acts alleged if not a true statement;
10 isn't that right?

11 MR. PIKE: Form.

12 A I would very much like to respond to
13 whether [REDACTED] was a willing participant in any
14 alleged act. However, at least today, Mr.
15 Horowitz, my counsel has advised me that I must
16 assert my rights under the Sixth, Fifth and
17 Fourteenth Amendment.

18 Q Sir, what facts do you know of to
19 support the statement that [REDACTED] consented to and
20 was a willing participant in the acts alleged?

21 MR. PIKE: Form.

22 A Though I would like to respond to every
23 question regarding the facts regarding [REDACTED] and
24 what she consented to and what she did not
25 consent to, I'm afraid that at least today my

1 counsel has advised me I must assert my rights
2 under the Fifth, Sixth and Fourteenth Amendment.

3 Q Turning to paragraph two of your
4 Affirmative Defenses, what facts are you aware of
5 to support your contention that [REDACTED] consented
6 to and participated in similar or identical acts
7 with other persons?

8 MR. PIKE: Form.

9 A Though I would very much like to respond
10 to similar acts that [REDACTED] participated in with
11 respect to your question, sir, at least today my
12 counsel has advised me that I must assert my
13 rights under the Sixth, Fifth and Fourteenth
14 Amendment.

15 Q Isn't it true, sir, you know of no facts
16 to support your contention in the Affirmative
17 Defenses that [REDACTED] participated in similar or
18 identical acts with other persons?

19 MR. PIKE: Form.

20 A As I said previously, I would like to
21 testify, I would like to answer your questions
22 with respect to [REDACTED]. However, today my counsel
23 has advised me that at least today I would have
24 to assert my rights under the Sixth, Fifth and
25 Fourteenth Amendment.

1 Q Isn't it true, sir, you're not aware of
2 anyone who has facts to support the contention
3 that [REDACTED] participated or consented to similar or
4 identical acts with other people?

5 MR. PIKE: Form.

6 A The issue of whether [REDACTED] participated
7 with other people in similar alleged acts, I
8 would very much like to answer. However, today my
9 counsel has advised me I may not, and have
10 advised me I must assert my Sixth, Fifth and
11 Fourteenth Amendment rights.

12 Q Turning to paragraph three, what facts
13 do you have to support your contention that [REDACTED]
14 consented to the acts alleged by not objecting?

15 MR. PIKE: Form.

16 A Though I would like to answer every
17 question here today regarding [REDACTED] my counsel
18 has advised me that at least today I have to
19 assert my rights under the Sixth, Fifth and
20 Fourteenth Amendment.

21 Q Isn't it true, sir, you know of no facts
22 to support your contention that [REDACTED] consented to
23 the acts alleged by not objecting?

24 MR. PIKE: Form.

25 A Though I would like to answer every

1 question you pose regarding [REDACTED], Mr. Horowitz,
2 at least today my counsel has advised me I must
3 assert my rights to the Sixth, Fifth and
4 Fourteenth Amendment.

5 **Q Is it true, sir, you're not aware of**
6 **anyone who has facts to support the statement**
7 **that [REDACTED] consented to the acts alleged by not**
8 **objecting?**

9 MR. PIKE: Form.

10 A I would like to answer the question with
11 respect to [REDACTED]'s consent or not consent.
12 However, today my counsel has advised me I must
13 assert my rights under the Sixth, Fifth and
14 Fourteenth Amendment, though I would very much
15 like to answer that question.

16 **Q Turning to paragraph four of the**
17 **Affirmative Defenses, sir, you did not believe in**
18 **your own mind that [REDACTED] was 18 years or older**
19 **before May of 2005; isn't that true?**

20 MR. PIKE: Form.

21 A Would you repeat the question, Mr.
22 Horowitz?

23 **Q You didn't believe prior to May 2005 in**
24 **your mind that [REDACTED] was 18 years old or older;**
25 **isn't that true?**

1 MR. PIKE: Form.

2 A What I believed in my mind,
3 unfortunately I would like to answer every
4 question with regard to [REDACTED] that you posed here
5 today, very much would like to answer every
6 question with respect to [REDACTED]. However, at least
7 today I have to assert my rights on advice of
8 counsel under the Sixth, Fifth and Fourteenth
9 Amendment.

10 **Q Sir, before May of 2005, you knew that**
11 **[REDACTED] was under the age of 18; isn't that right?**

12 MR. PIKE: Form.

13 A Sir, I would like to answer every
14 question with respect to [REDACTED] that you've posed
15 here today. However, my counsel has advised me
16 that at least today I may not, and must assert my
17 rights under the Sixth, Fifth and Fourteenth
18 Amendment.

19 **Q Sir, prior to May 2005 [REDACTED] never told**
20 **you she was 18 or older; isn't that true?**

21 MR. PIKE: Form?

22 A I would very much like to answer those
23 questions, every question with respect to [REDACTED]
24 that you've posed here today, Mr. Horowitz.
25 However, upon advice of my counsel, they've

1 advised me that I must assert my rights under the
2 Sixth, Fifth and Fourteenth Amendment.

3 **Q Prior to May 2005, no one told you that**
4 **[REDACTED] was under the age of 18; isn't that right?**

5 MR. PIKE: Form.

6 A I would very much like to answer every
7 question with respect to what [REDACTED] and what
8 everyone -- other people said about [REDACTED].
9 However, at least today my counsel advised me
10 that I may not. They've advised me that I must
11 assert my rights under the Sixth, Fifth and
12 Fourteenth Amendment.

13 (Multi-page document was marked as
14 Plaintiff's Exhibit number 8 for
15 identification, as of this date.)

16 **Q Sir, I've just handed you defendant**
17 **Jeffrey Epstein's Answer and Affirmative Defenses**
18 **to plaintiff's Amended Complaints in the Jane**
19 **Does number 8 lawsuit, filed by [REDACTED]. Do you have**
20 **that in front of you?**

21 A Yes.

22 **Q I'll ask you to turn, please, to page 6,**
23 **which is the Affirmative Defenses.**

24 **With regard to paragraph one, what facts**
25 **do you have to support your contention that [REDACTED]**

1 **consented to and was a willing participant in the**
2 **acts alleged?**

3 MR. PIKE: Form.

4 A I would like to answer every question
5 about J.M. here today. However, my counsel has
6 advised me that at least today -- I must assert
7 my rights under the Sixth, Fifth and Fourteenth
8 Amendment, though I would very much like to
9 answer every question regarding [REDACTED].

10 **Q Sir, what facts do you know of to**
11 **support the statement that [REDACTED] consented to and**
12 **was a willing participant in the acts alleged?**

13 MR. PIKE: Form.

14 A Though I would like to answer every
15 question about any alleged incident with [REDACTED], my
16 counsel has advised me that at least today I must
17 assert my rights under the Sixth, Fifth and
18 Fourteenth Amendment.

19 **Q Isn't it true, sir, you're not aware of**
20 **anyone who has facts to support your assertion**
21 **that [REDACTED] consented to and was a willing**
22 **participant in the acts alleged?**

23 MR. PIKE: Form.

24 A I would like to answer every question
25 regarding [REDACTED] and her claims, and these alleged

1 incidents. However, today, at least today, my
2 counsel has advised me that I must assert my
3 rights under the Sixth, Fifth and Fourteenth
4 Amendment.

5 Q Okay, turning to paragraph two, what
6 facts are you aware of to support your contention
7 that [REDACTED] consented to and participated in
8 similar or identical acts with other people?

9 MR. PIKE: Form.

10 A With respect to acts with similar other
11 people, I would very much like to answer that
12 question. However, at least today my counsel has
13 advised me that I must assert my rights under the
14 Sixth, Fifth and Fourteenth Amendment.

15 Q Isn't it true, sir, that this assertion
16 that [REDACTED] consented to and participated in
17 similar or identical acts with other persons;
18 that's not a true statement, is it?

19 MR. PIKE: Form.

20 A I would very much like to answer every
21 single question with respect to [REDACTED] and her
22 alleged claims of alleged incidents. However,
23 today, my counsel has advised me I must assert my
24 rights under the Sixth, Fifth and Fourteenth
25 Amendment.

1 Q Isn't it true, sir, you're not aware of
2 anyone who has facts to support your assertion
3 that [REDACTED] consented to and participated in
4 similar or identical acts with other people?

5 MR. PIKE: Form.

6 A I would like to answer every question
7 with respect to [REDACTED] her alleged claims and
8 alleged incidents. However, today my counsel
9 has advised me that I must assert my rights under
10 the Sixth, Fifth and Fourteenth Amendment, sir.

11 Q Turning to paragraph three, what facts
12 do you have to support your assertion that [REDACTED]
13 consented to the acts alleged by not objecting?

14 MR. PIKE: Form.

15 A I would like to answer every question
16 with respect to [REDACTED] claims and alleged
17 incidents. However, today my counsel has advised
18 me I must assert my rights under the Sixth, Fifth
19 and Fourteenth Amendment.

20 Q Isn't it true, sir, you're not aware of
21 anyone who has facts to support your assertion
22 that [REDACTED] consented to the facts alleged by not
23 objecting?

24 MR. PIKE: Form.

25 A I would very much like to answer every

1 question that you've posed regarding your client,
2 [REDACTED] However, my counsel here today has advised
3 me that I must assert my rights under the Sixth,
4 Fifth and Fourteenth Amendment, at least today.

5 Q Turning to paragraph four of the
6 Affirmative Defenses, it is on the following page
7 if you want to follow along; what facts do you
8 have to support your contention that you believed
9 [REDACTED] attained the age of 18 at the time of the
10 alleged acts?

11 MR. PIKE: Form.

12 A I would very much like to answer every
13 question with respect to [REDACTED] and her claims.
14 However, today, at least today, my attorneys have
15 advised me that I must assert my rights under the
16 Sixth, Fifth and Fourteenth Amendment.

17 Q Isn't it true, sir, you knew that [REDACTED]
18 was under the age of 18 at the time of the
19 alleged acts?

20 MR. PIKE: Form.

21 A I would very much like to answer every
22 question with respect to [REDACTED] claims. However,
23 my counsel today has advised me I must assert my
24 rights under the Sixth, Fifth and Fourteenth
25 Amendment.

1 Q Isn't it true, sir, you had no reason to
2 believe that [REDACTED] was 18 years old or older at
3 the time of the alleged acts?

4 MR. PIKE: Form.

5 A I would like to answer every single
6 question regarding [REDACTED]s claims, sir. However,
7 at least today my counsel has advised me I must
8 assert my rights under the Sixth, Fifth and
9 Fourteenth Amendment.

10 Q Isn't it true, sir, [REDACTED] never told you
11 she was 18 or older?

12 MR. PIKE: Form.

13 A I would very much like to answer every
14 question regarding [REDACTED] claims. However, today
15 my counsel has advised me that I must assert my
16 rights under the Sixth, Fifth and Fourteenth
17 Amendment.

18 Q Isn't it true, sir, no one ever told you
19 that [REDACTED] was 18 or older?

20 MR. PIKE: Form.

21 A I would like to answer every question
22 with respect to [REDACTED] claims. However, at least
23 today my counsel has advised me that I may not,
24 and though I would like to, they told me I must
25 assert my rights under the Sixth, Fifth and

1 Fourteenth Amendment.

2 **Q Sir, did you ever pay for a telephone**

3 **number [REDACTED] pay the phone bill?**

4 A I would have to assert my rights under

5 the Sixth, Fifth and Fourteenth Amendment, sir.

6 **Q Between 2001 and 2006, did you use the**

7 **telephone number [REDACTED] to get kids to**

8 **come to your home for your sexual pleasure?**

9 MR. PIKE: Form.

10 A Though I would like to answer all these

11 questions regarding phone numbers, I'm sorry but

12 I may not on advice of counsel, so I must assert

13 my rights under the Sixth, Fifth and Fourteenth

14 Amendment.

15 **Q Did you direct one or more people to use**

16 **the telephone number [REDACTED] in order to**

17 **get kids, girls, to come to your home for your**

18 **sexual pleasure?**

19 MR. PIKE: Form.

20 A Though I would like to answer every one

21 of your questions today regarding phone numbers,

22 on advice of counsel, I may not, because it may

23 be relevant to other lawsuits or this lawsuit,

24 and they've instructed me that I must assert my

25 rights under the Sixth, Fifth and Fourteenth

1 Amendment.

2 **Q Have you ever either paid or had**

3 **registered to you the telephone number [REDACTED]**

4 **[REDACTED]**

5 MR. PIKE: Form.

6 A I would like to answer every question

7 regarding phone numbers, Mr. Horowitz. My

8 attorneys have asked me to respond to most of

9 your questions here today by asserting my rights

10 under the Sixth, Fifth and Fourteenth Amendment I

11 will have to do so with respect to that question.

12 **Q Between the years 2001 and 2006, did you**

13 **use the telephone number [REDACTED] in order**

14 **to arrange for girls under the age of 18 to come**

15 **to your home for your sexual pleasure?**

16 MR. PIKE: Form.

17 A I would like to answer every one of your

18 questions regarding phone numbers here today, Mr.

19 Horowitz. However, on advice of counsel, at

20 least today, they've instructed me that I must

21 assert my rights under the Sixth, Fifth and

22 Fourteenth Amendment.

23 **Q Between 2001 and 2006, did you direct**

24 **one or more people to use the telephone number**

25 **[REDACTED], in order to get girls under the**

1 **age of 18 to come to your home for your sexual**

2 **pleasure?**

3 MR. PIKE: Form.

4 A I would like to answer every one of your

5 questions regarding these phone numbers and

6 allegations. However, today, my counsel has

7 advised me that I may not and must assert my

8 rights under the Sixth, Fifth and Fourteenth

9 Amendment.

10 **Q Have you ever paid the telephone bill or**

11 **had registered in your name the phone number**

12 **[REDACTED]**

13 MR. PIKE: Form.

14 A Mr. Horowitz, I would like to answer

15 each one of your questions regarding phone

16 numbers here today, but on advice of counsel

17 they've told me I must assert my rights under the

18 Sixth, Fifth and Fourteenth Amendment.

19 **Q Is [REDACTED] a telephone number you**

20 **used between 2001 and 2006 to get girls under the**

21 **age of 18 to come to your home for your sexual**

22 **pleasure?**

23 MR. PIKE: Form.

24 A Though I would like to answer every one

25 of your questions regarding telephone numbers, my

1 counsel has advised me that at least today I may

2 not, because it may be relevant to this lawsuit

3 or another lawsuit, and they've instructed me

4 that I must assert my rights under the Sixth,

5 Fifth and Fourteenth Amendment.

6 **Q Is [REDACTED] a telephone number**

7 **that you directed to other people to use in order**

8 **to get kids to come to your home for your sexual**

9 **pleasure?**

10 MR. PIKE: Form.

11 A I would like to answer every one of your

12 questions regarding phone numbers allegedly used

13 for these types of purposes. However, my counsel

14 today has advised me I may not and have

15 instructed me I must assert my rights under the

16 Sixth, Fifth and Fourteenth Amendment.

17 **Q Sir, have you ever paid the phone bill**

18 **or had registered in your name the phone number**

19 **[REDACTED]?**

20 MR. PIKE: Form.

21 A Though I would like to answer that

22 question as I would like to answer every one of

23 your questions here today, my counsel has advised

24 me that at least today, I must assert my rights

25 under the Sixth, Fifth and Fourteenth Amendment,

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1 sir.

2 **Q Is the telephone number [REDACTED]**

3 **a telephone number you used between 2001 and 2006**

4 **in order to get girls under the age of 18 to come**

5 **to your home for your sexual pleasure?**

6 MR. PIKE: Form.

7 A I would like to answer every one of your

8 questions with respect to these telephone

9 numbers. However, my counsel today has advised

10 me that I must assert, at least today, my rights

11 under the Fifth, Sixth and Fourteenth Amendment.

12 **Q Sir, is [REDACTED] telephone**

13 **number that you directed other people to use in**

14 **order to get girls under the age of 18 to come to**

15 **your home for your sexual pleasure?**

16 MR. PIKE: Form.

17 A I would like to answer every question

18 regarding these telephone numbers. However, my

19 counsel has advised me that at least today, that

20 I may not and they've instructed me I must assert

21 my rights under the Sixth, Fifth and Fourteenth

22 Amendment.

23 **Q Sir, have you ever registered in your**

24 **name or paid the phone bill for telephone number**

25 **[REDACTED]**

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1 MR. PIKE: Form.

2 A I would like to answer each one of your

3 questions today, Mr. Horowitz, regarding these

4 telephone numbers. My counsel has advised me

5 that at least today I may not, and must assert my

6 rights under the Sixth, Fifth and Fourteenth

7 Amendment.

8 **Q Is [REDACTED] a telephone number you**

9 **used between 2001 and 2006 to get girls under the**

10 **age of 18 to come to your home for your sexual**

11 **pleasure?**

12 MR. PIKE: Form.

13 A Though I would very much like to answer

14 every question regarding -- that you've posed

15 here today regarding phone numbers, on advice of

16 counsel, I may not. They've instructed me I must

17 assert my rights under the Sixth, Fifth and

18 Fourteenth Amendment.

19 **Q Is [REDACTED] a telephone number you**

20 **directed other people to use in order to get**

21 **girls under the age of 18 to come to your home**

22 **for your sexual pleasure?**

23 MR. PIKE: Form.

24 A I would like to answer every one of your

25 questions posed here today regarding various

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1 phone numbers. However, upon advice of my

2 counsel, they've instructed me that I must assert

3 my rights under the Sixth, Fifth and Fourteenth

4 Amendment.

5 **Q Sir, have you ever paid the phone bill**

6 **or had the phone number [REDACTED] registered**

7 **in your name?**

8 MR. PIKE: Form.

9 A I would very much like to answer every

10 question regarding phone numbers that you've

11 posed here today, Mr. Horowitz. However, my

12 counsel has advised me that at least today I must

13 assert my rights under the Sixth, Fifth and

14 Fourteenth Amendment.

15 **Q Sir, is the telephone number [REDACTED]**

16 **[REDACTED] a telephone number you used between 2001**

17 **and 2006 to get underage girls to come to your**

18 **home for your sexual pleasure?**

19 MR. PIKE: Form.

20 A I would very much like to answer every

21 one of your questions posed here today with

22 regard to telephone numbers or anything else.

23 However, my counsel has advised me at least today

24 that I may not, and must assert my rights under

25 the Sixth, Fifth and Fourteenth Amendment.

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1 **Q Sir, is the telephone number [REDACTED]**

2 **[REDACTED] a telephone number you directed others**

3 **to use in order to get underage girls to come to**

4 **your home for your sexual pleasure?**

5 MR. PIKE: Form.

6 A I would like to answer every one of your

7 questions regarding phone numbers, Mr. Horowitz.

8 However, today my counsel has advised me that I

9 must assert my rights under the Sixth, Fifth and

10 Fourteenth Amendment.

11 **Q Sir, have you ever paid the phone bill**

12 **or had the phone number [REDACTED] registered**

13 **in your name?**

14 MR. PIKE: Form.

15 A Sir, I would like to answer every one of

16 your questions regarding phone numbers. However,

17 my counsel has advised me that at least today I

18 must assert my rights under the Sixth, Fifth and

19 Fourteenth Amendment.

20 **Q Is the telephone number [REDACTED] a**

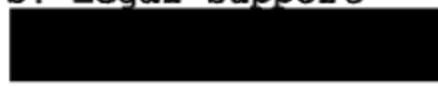
21 **telephone number that you used between 2001 and**

22 **2006 in order to get kids to come to your home**

23 **for your sexual pleasure?**

24 MR. PIKE: Form.

25 A Though I would like to answer every one



1 of your questions regarding phone numbers here
2 today, Mr. Horowitz, my counsel has advised me
3 that I may not and must assert my rights under
4 the Sixth, Fifth and Fourteenth Amendment.

5 **Q Sir, is telephone number [REDACTED]**
6 **a telephone number that you directed others to**
7 **use in order to get underage girls to come to**
8 **your home for your sexual pleasure?**

9 MR. PIKE: Form.

10 A Though I would like to answer every one
11 of your questions regarding phone numbers, Mr.
12 Horowitz, the various phone numbers you've now
13 put on the table, my counsel has advised me at
14 least today I may not. I must assert my rights
15 under the Sixth, Fifth and Fourteenth Amendment.

16 **Q Sir, have you ever paid the phone bill**
17 **or had registered in your name the telephone**
18 **number [REDACTED]**

19 MR. PIKE: Form.

20 A Mr. Horowitz, I would like to answer
21 every one of your questions regarding phone
22 numbers that you've posed here today. However,
23 upon advice of counsel, they've instructed me I
24 must assert my rights under the Sixth, Fifth and
25 Fourteenth Amendment.

1 **Q Is [REDACTED] a telephone number**
2 **that you used between 2001 and 2006 in order to**
3 **get girls under the age of 18 to come to your**
4 **home for your sexual pleasure?**

5 MR. PIKE: Form.

6 A Mr. Horowitz, I would very much like to
7 answer every one of your questions regarding
8 various numbers you've thrown out here today. I
9 have to answer that question like I've answered
10 all your other questions here today, which is on
11 advice of counsel I may not answer these
12 questions as they may not be relevant to another
13 lawsuit --

14 **Q Sir -- go ahead, sorry.**

15 A -- though I would like to, I am going to
16 have to assert my rights as instructed by
17 counsel, under the Sixth, Fifth and Fourteenth
18 Amendment.

19 **Q Sir, is the telephone number [REDACTED]**
20 **[REDACTED] a telephone number that you directed**
21 **others to use in order to bring girls to your**
22 **home for your sexual pleasure?**

23 MR. PIKE: Form.

24 A Though I would like to answer each and
25 every one of your questions, Mr. Horowitz,

1 regarding these various phone numbers you've
2 thrown out today, my counsel have advised me that
3 I may not, and must assert my rights under the
4 Sixth, Fifth and Fourteenth Amendment.

5 **Q Sir, have you ever paid the phone bill**
6 **for telephone number [REDACTED]**

7 MR. PIKE: Form.

8 A Mr. Horowitz, I would very much like to
9 answer all your questions regarding all the
10 various phone numbers you've thrown out here
11 today. However, on advice of counsel they've
12 asked me to assert my Sixth, Fifth and Fourteenth
13 Amendment right.

14 **Q Sir, is the telephone number [REDACTED]**
15 **[REDACTED] a telephone number that you used between**
16 **2001 and 2006 in order to get underage girls to**
17 **come to your home for your sexual pleasure?**

18 MR. PIKE: Form.

19 A Mr. Horowitz, with respect to all these
20 phone numbers you keep throwing out, I have to
21 unfortunately answer the question the same way as
22 I've answered all your other questions here
23 today, which is I'm going to have to assert my
24 rights upon the advice of counsel under the
25 Sixth, Fifth and Fourteenth Amendment.

1 **Q Sir, is [REDACTED] a telephone**
2 **number that you directed other people to use in**
3 **order to get girls to come to your home for your**
4 **sexual pleasure?**

5 MR. PIKE: Form.

6 A Although I would like to answer every
7 one of your questions regarding the various phone
8 numbers that you've thrown out today, at least
9 today, upon advice of counsel, I have to assert
10 my rights under the Sixth, Fifth and Fourteenth
11 Amendment.

12 **Q Have you ever paid the phone bill for**
13 **telephone number [REDACTED]?**

14 MR. PIKE: Form?

15 A With respect to all the phone numbers
16 you've thrown out here today and asked questions
17 with regard to today, my counsel has advised me I
18 must assert my rights under the Sixth, Fifth and
19 Fourteenth Amendment.

20 **Q Is the telephone number [REDACTED] a**
21 **telephone number you directed other people to use**
22 **in order to bring girls under the age of 18 to**
23 **your home for your sexual pleasure?**

24 MR. PIKE: Form.

25 A I have to answer that question as I've

1 answered most of your other questions here today,
2 Mr. Horowitz, which is upon advice of counsel I
3 have to assert my rights under the Sixth, Fifth
4 and Fourteenth Amendment.

5 **Q Sir, have you ever paid the phone bill
6 for telephone number [REDACTED]**

7 MR. PIKE: Form.

8 A You've asked me many telephone numbers
9 here today, Mr. Horowitz. I'm going to have to
10 respond to that telephone number as I have to
11 each and every one of your other phone numbers
12 you've thrown out today, which is upon advice of
13 counsel, they've instructed me to assert my
14 rights under the Sixth, Fifth and Fourteenth
15 Amendment although I would like to answer every
16 one of your questions.

17 **Q Is the number [REDACTED], a
18 telephone number that you directed other people
19 to use in order to bring underage girls to your
20 home for your sexual pleasure?**

21 MR. PIKE: Form.

22 A Though I would like to answer every
23 question regarding phone numbers that you've
24 posed here today, Mr. Horowitz, unfortunately my
25 counsel advised me I must assert my rights under

1 the Sixth, Fifth and Fourteenth Amendment.

2 **Q Sir, have you ever owned or had a
3 beneficial interest in a corporation known as
4 Nine East 71st Street Corporation?**

5 A I would like to answer every one of your
6 questions here today, Mr. Horowitz, but on advice
7 of counsel, at least today, I'm going to have to
8 assert my rights under the Sixth, Fifth and
9 Fourteenth Amendment.

10 **Q Sir, have you ever owned or had a
11 beneficial interest in J. Epstein & Company?**

12 A Sir, at least today with respect to most
13 of your questions, like -- I've answered almost
14 all of your questions here today, upon advice of
15 counsel, they've asked me to assert my rights
16 under the Sixth, Fifth and Fourteenth Amendment.

17 **Q Have you ever owned or had a beneficial
18 interest or been an officer of Zorro Development
19 Corporation?**

20 A I would like to answer every one of your
21 questions here today, Mr. Horowitz. However,
22 upon advice of counsel at least today, they've
23 asked me to assert my rights under the Sixth,
24 Fifth and Fourteenth Amendment.

25 **Q Have you ever owned or had a beneficial**

1 **interest in a business entity known as Zorro
2 Ranch?**

3 A Though I would like to answer every one
4 of your questions, I would have to answer that
5 one as I've answered all your other questions
6 here today, which is upon advice of counsel today
7 they've asked me -- instructed me to assert my
8 rights under the Sixth, Fifth and Fourteenth
9 Amendment.

10 **Q Sir, have you ever owned or had a
11 beneficial interest, been a director or officer
12 of New York Strategy Group, LLC?**

13 A Mr. Horowitz, I would like to answer all
14 of your questions here today, but unfortunately
15 my counsel has asked me -- instructed me to
16 assert my rights under the Sixth, Fifth and
17 Fourteenth Amendment.

18 **Q Have you ever owned or had a beneficial
19 interest in or been an officer or director or
20 founder of the COUQ Foundation?**

21 A Though I would like to answer every one
22 of your questions, Mr. Horowitz, I have to
23 respond to that question as I have responded to
24 almost all of your other questions here today,
25 which is that upon advice of counsel, they've

1 instructed me I must assert my rights under the
2 Sixth, Fifth and Fourteenth Amendment.

3 **Q Have you ever been an owner, shareholder
4 or had a beneficial interest in Financial
5 Strategy Group, Inc.?**

6 A I would like to answer that question, as
7 well as every other question you've posed here
8 today. However, my counsel has advised me that
9 at least today I must assert my rights under the
10 Sixth, Fifth and Fourteenth Amendment.

11 **Q Have you ever owned or had a beneficial
12 interest or been a shareholder in Financial
13 Trustees, Inc.?**

14 A Though I would like to answer every one
15 of your questions here, that you've posed here
16 today, Mr. Horowitz, I have to unfortunately
17 answer that question the same way as I've
18 answered almost all of your other questions here
19 today. Upon advice of my counsel they've
20 instructed me to assert my Sixth, Fifth and
21 Fourteenth Amendment right.

22 **Q Sir, have you ever been an owner,
23 shareholder, officer or director of the Gislaine
24 Corporation?**

25 A Can you spell that?

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1 **Q G-i-s-l-a-i-n-e, am I mispronouncing?**
2 A Yes.
3 **Q How would you pronounce it?**
4 A Gislaine.
5 **Q Okay.**
6 A I'm sorry, but today at least I have to
7 assert my rights under the Sixth, Fifth and
8 Fourteenth Amendment upon advice of counsel.
9 **Q Sir, have you ever been an**
10 **owner/shareholder or director of the LAW**
11 **Plantation Management Corporation?**
12 A I would like to answer every one of your
13 questions here today, Mr. Horowitz, with respect
14 to that one, as well as all the others, I have to
15 assert my rights under the Sixth, Fifth and
16 Fourteenth Amendment.
17 **Q Sir, have you ever been an owner,**
18 **shareholder or director of a business entity**
19 **known as Epstein Interests?**
20 A With respect to that question, as well
21 as all of your other questions here today, my
22 counsel advised me I may only answer the
23 questions by asserting my rights under the Sixth,
24 Fifth and Fourteenth Amendment.
25 **Q Sir, have you ever been officer,**

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1 **director, shareholder or employee of the Wexner**
2 **Investment Group?**
3 A I have to respond to that question as I
4 have responded to all your other questions here
5 today, Mr. Horowitz. Upon advice of counsel
6 they've instructed me to assert my rights under
7 the Sixth, Fifth and Fourteenth Amendment.
8 **Q Sir, have you ever been a shareholder or**
9 **owner of MC Squared Modeling?**
10 A With respect to that question, as all
11 the other questions you've posed here today, my
12 counsel has advised me I must assert my rights
13 under the Sixth, Fifth and Fourteenth Amendment.
14 **Q Sir, do you have an ownership or**
15 **beneficial interest in a business entity known as**
16 **JEGE?**
17 A I'm going to have to respond to that
18 question as I responded to all of your other
19 questions here today, Mr. Horowitz, which is, on
20 advice of counsel they've asked me to assert my
21 rights under the Sixth, Fifth and Fourteenth
22 Amendment.
23 **Q Sir, do you have an ownership or**
24 **beneficial interest or even an employee of an**
25 **entity known as the Florida Science Foundation?**

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1 THE WITNESS: Take a quick...
2 (Indicating counsel.)
3 THE VIDEOGRAPHER: Going off the video
4 record 11:53 a.m.
5 (Pause in the proceedings.)
6 THE VIDEOGRAPHER: Back on the record
7 11:56 a.m.
8 (The record was read.)
9 A Yes.
10 **Q Are you an owner of the Florida Science**
11 **Foundation?**
12 A On advice of counsel, at least today,
13 sir, I have been instructed to assert my rights
14 under the Sixth, Fifth and Fourteenth Amendment.
15 **Q Are you an employee of Florida Science**
16 **Foundation?**
17 A Yes.
18 **Q What do you do in your role as an**
19 **employee of Florida Science Foundation?**
20 A Though I would like to answer all of
21 your questions here today, Mr. Horowitz, upon
22 advice of counsel, they've instructed me I must
23 assert my rights under the Sixth, Fifth and
24 Fourteenth Amendment.
25 **Q What kind of work is the Florida Science**

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1 **Foundation involved in, if any?**
2 MR. PIKE: Form.
3 A Though I would very much like to answer
4 all of your questions here today, Mr. Horowitz,
5 upon advice of counsel, they've instructed me to
6 assert my rights under the Sixth, Fifth and
7 Fourteenth Amendment.
8 **Q Where do you work for the Florida**
9 **Science Foundation?**
10 MR. PIKE: Form.
11 A At 250 South Australian. That's the
12 offices.
13 **Q Is that the City of West Palm Beach?**
14 A Yes, sir.
15 **Q During what hours do you work at the**
16 **Florida Science Foundation?**
17 A Upon advice of counsel, sir, they've
18 instructed me to assert my rights under the
19 Sixth, Fifth and Fourteenth Amendment.
20 **Q How long have you been working at the**
21 **Florida Science Foundation?**
22 MR. PIKE: Form.
23 A I would like to answer all of your
24 questions here today, Mr. Horowitz. However,
25 upon advice of counsel, at least today, they've

417

1 instructed me to assert my rights under the
2 Sixth, Fifth and Fourteenth Amendment.

3 **Q On what days do you work for the Florida
4 Science Foundation?**

5 MR. PIKE: Form.

6 A Though I would like to answer each one
7 of your questions here today, my counsel has
8 advised me that at least today I must assert my
9 rights under the Sixth, Fifth and Fourteenth
10 Amendment.

11 **Q Who else, if anyone, works for the
12 Florida Science Foundation?**

13 MR. PIKE: Form.

14 A Though I would like to --

15 MR. PIKE: You know that's standard
16 Fifth Amendment, anyway.

17 A Though I would like to answer each and
18 every one of your questions today, Mr. Horowitz,
19 my counsel has advised me with respect to that
20 question, I must assert my rights under the
21 Sixth, Fifth and Fourteenth Amendment.

22 **Q Is the Florida Science Foundation a
23 for-profit or nonprofit corporation?**

24 A Upon advice of counsel, sir, with
25 respect to that question, I'm going to have to

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1 assert my rights under the Sixth, Fifth and
2 Fourteenth Amendment.

3 MR. HOROWITZ: Sir, at this moment in
4 time, I don't have further questions. There
5 may be some other questions that arise from
6 other people's questions.

7 THE WITNESS: All right.

8 MR. PIKE: Thank you, Mr. Horowitz.

9 MR. EDWARDS: Does anybody want to
10 address what we are going to do for lunch?

11 MR. HOROWITZ: You don't have to type
12 this.

13 (Discussion off the record.)

14 THE VIDEOGRAPHER: Off the video record
15 at 12:00 o'clock noon.

16 (Pause in the proceedings.)

17 THE VIDEOGRAPHER: Back on the video
18 record 12:11 p.m.

19 MR. EDWARDS: Ready?

20 MR. PIKE: Yes, thank you.

21 THE WITNESS: Yes.

22 **Q I represent Jane Doe in a case against
23 you and she is one of like ten representative
24 plaintiffs here today. Did you do anything to
25 prepare for your deposition today?**

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1 MR. PIKE: To the extent you can answer
2 that question without divulging my
3 communications with you, you can answer that
4 question.

5 A No.

6 **Q Did you review any materials, such as
7 depositions, police reports, anything else in
8 preparation for your deposition today?**

9 A No.

10 **Q Did you review any notes or any
11 handwritten materials in preparation for your
12 deposition today?**

13 A No.

14 **Q You have notes on a piece of paper, are
15 those notes that you have made or reviewed in
16 preparation for your continuation of this
17 deposition here today?**

18 A No.

19 **Q In the past you've told me that some
20 time ago at another deposition, that you did not
21 like Jane Doe; is that right?**

22 A I don't believe -- I have no
23 recollection of that.

24 **Q To be more specific, and hopefully to
25 jog your memory, do you remember telling me you**

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1 **like L.M., but don't like my other two, one of
2 those clients being Jane Doe; do you recall that?**

3 A I would like to answer every one of your
4 questions, Mr. Edwards, but today at least, my
5 counsel advised me I must assert my rights under
6 the Sixth, Fifth and Fourteenth Amendment.

7 **Q Why don't you like Jane Doe?**

8 MR. PIKE: Form.

9 A I would like to answer every one of your
10 questions, Mr. Edwards. However, today my
11 counsel has advised me that I must assert my
12 rights under the Sixth, Fifth and Fourteenth
13 Amendment.

14 **Q Did you sexually molest Jane Doe when
15 she was 14 and 15 years old?**

16 MR. PIKE: Form.

17 A I would like to answer all of your
18
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1 questions with respect to Jane Doe. However my
2 counsel here today advised me I may not and must
3 assert my rights under the Sixth, Fifth and
4 Fourteenth Amendment.
5 MR. EDWARDS: Move to strike as
6 nonresponsive.
7 Q When you say you would like to answer
8 the questions, but your counsel has instructed
9 you that you must invoke your Fifth, Sixth and
10 Fourteenth Amendment rights, are you saying that
11 you disagree with the advice of your counsel?
12 MR. PIKE: I instruct you not to answer
13 that question.
14 MR. EDWARDS: On what ground?
15 MR. PIKE: I don't need to give you
16 grounds.
17 MR. EDWARDS: It is not a privilege,
18 just something you're instructing him not to
19 answer?
20 MR. PIKE: Absolutely it is a
21 privilege. You heard him, what he said. He
22 is invoking his Sixth, Fifth and Fourteenth
23 Amendment in and as a result of his advice
24 of counsel. Your question elicits
25 attorney/client communications as well as

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1 work product.
2 Q So, attorney/client work product is the
3 basis for your objection? I understand.
4 MR. PIKE: Yeah.
5 Q Mr. Epstein, are you going to follow
6 your advice of counsel and invoke your Fifth
7 Amendment right against self-incrimination and
8 not answer that question?
9 A I'm going to follow my advice of
10 counsel.
11 Q Mr. Epstein, are you familiar with the
12 laws in Florida on lewd and lascivious
13 molestation?
14 MR. PIKE: Form.
15 A On advice of counsel I have to assert my
16 rights with the Sixth, Fifth and Fourteenth
17 Amendment.
18 Q Do you understand my question in that
19 I'm not asking you whether you committed any
20 crimes related to the statute, only whether or
21 not you are familiar with the Florida statute on
22 lewd and lascivious molestation; do you
23 understand that question?
24 MR. PIKE: Form.
25 A What does "familiar" mean.

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1 Q Have you read the statute or been
2 instructed upon the Florida statute related to
3 lewd and lascivious molestation?
4 MR. PIKE: Form, instruct you not to
5 answer that question, attorney/client work
6 product, as worded.
7 Q Other than your attorney telling you
8 about the statute, or reading that statute to
9 you, I certainly do not want and am not entitled
10 to communications between you and your attorney,
11 but have you otherwise familiarized yourself,
12 either by way of reading the statute or being
13 told by somebody other than your attorneys,
14 regarding the statute lewd and lascivious
15 molestation?
16 MR. PIKE: Form.
17 A Though I would like to answer every one
18 of you ever questions here today, Mr. Edwards,
19 most of your questions I have to respond by
20 asserting on advice of counsel my Sixth, Fifth
21 and Fourteenth Amendment right.
22 Q Lewd and lascivious molestation is
23 defined in Florida as a person who intentionally
24 touches in a lewd or lascivious manner, the
25 breasts, genitals, general area, or buttocks, or

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1 the clothing covering them, of a person less than
2 16 years of age, or forces or entices a person
3 under 16 years of age to so touch the
4 perpetrator."
5 Having read that, isn't that a statute
6 that you violated on numerous occasions against
7 Jane Doe when she was a minor?
8 MR. PIKE: Form.
9 A I would -- have to assert my rights
10 under the Sixth, Fifth and Fourteenth Amendment
11 upon advice of counsel, Mr. Edwards.
12 Q Subchapter six of that statute involves
13 a crime of lewd and lascivious conduct that in
14 Florida is defined as a person who intentionally
15 touches a person under 16 years of age in a lewd
16 and lascivious manner, or a person who
17 intentionally masturbates in the presence of a
18 victim under 16 years of age." Those are also
19 sections of that Florida statute that you
20 violated against the then minor, Jane Doe; is
21 that true?
22 MR. PIKE: Form.
23 A I would like to answer all of your
24 questions with respect to Jane Doe, Mr. Edwards.
25 However, today my counsel has advised me that I

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1 am to assert my rights under the Sixth, Fifth and
2 Fourteenth Amendment.

3 MR. EDWARDS: Move to strike the
4 nonresponsive portion of that answer.

5 MR. PIKE: What's nonresponsive?

6 MR. EDWARDS: What you would like to do
7 is not responsive to the question related to
8 his course of conduct. "Did you molest
9 her," is either "yes" or "no" or "invoked."
10 I don't really care and I don't think it is
11 relevant, what he would like to do. That's
12 the part I would move to strike.

13 MR. PIKE: If that's the part you're
14 moving to strike, it is duly noted in the
15 record.

16 MR. EDWARDS: Okay.

17 MR. PIKE: I object to that. For the
18 record, based upon your comment, there have
19 been several depositions in these
20 consolidated cases and there has been
21 implied arguments from the plaintiff's side
22 relative to the Fifth Amendment waiver and
23 why Mr. Epstein is invoking the Sixth, Fifth
24 and Fourteenth Amendment Constitutional
25 privileges and there are various adverse

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1 inferences that I'm sure the plaintiffs will
2 attempt to gain.

3 There have been arguments made relative
4 to the Fifth Amendment and I think that you
5 have, in particular, Mr. Edwards, have
6 attempted to balance what Mr. Epstein would
7 like to do, versus what if he did that,
8 whether or not there would be a waiver of
9 the Fifth, the Sixth and the Fourteenth. So,
10 I understand your motion to strike and it is
11 noted on the record, but I have to make
12 clear for the record that there have been
13 those arguments made and there is a balance
14 as to what someone would like to do versus
15 what someone can do, and the resulting
16 consequences of that being waiver.

17 **Q Given what your attorney just said, my
18 understanding that... You have been instructed
19 that if you answer these questions, as you would
20 like to, that it would incriminate you?**

21 MR. PIKE: Mischaracterizes my
22 objection; and I instruct you not to
23 answer.

24 **Q Why is it that you would like to answer
25 questions about whether or not you violated**

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1 **molestation statutes against Jane Doe?**

2 MR. PIKE: Form.

3 A Upon advice of counsel, Mr. Edwards, I
4 have to respond to that question as I responded
5 to most of your other questions here today, by
6 asserting my rights under the Sixth, Fifth and
7 Fourteenth Amendment.

8 I prefer to, in fact, respond to your
9 partner who helped file this lawsuit, but he is
10 currently in jail. You might want to strike that
11 as nonresponsive, but the ladies and gentlemen of
12 the jury will eventually know that most of these
13 cases have been brought by your firm, your
14 partner who sits in a jail for fabricating cases
15 of sexual nature against people like me and
16 others.

17 **Q Okay. Let's talk about that, then.
18 You're talking about Scott Rothstein? Is that
19 right? You're saying my former partner. Is that
20 who you're referring to that sits in jail?**

21 A Correct.

22 **Q Okay, what about anything that Scott
23 Rothstein did, affects your answer to my question
24 as to whether or not you molested Jane Doe back
25 in 2003 and 2004?**

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1 MR. PIKE: Form?

2 A I would like to answer that question
3 with respect to Scott Rothstein, his fabricated
4 cases and the reason he sits in jail. However,
5 today, at least today, my counsel has advised me
6 I must assert my rights under the Sixth, Fifth
7 and Fourteenth Amendment.

8 **Q You say "at least today," but that's
9 something we have gone through with you day after
10 day, after day, and you say "at least today," and
11 we wait for the next deposition and again there
12 is assertion of a Fifth Amendment right. Is
13 there ever going to be a day where you do answer
14 the questions?**

15 MR. PIKE: Form. Move to strike.

16 A On advice of counsel, as I've answered
17 most of your other questions here today, be them
18 argumentative or not, meant for other purposes or
19 not, my answer is going to be that my counsel has
20 advised me that at least today I must assert my
21 rights under the Sixth, Fifth and Fourteenth
22 Amendment.

23 **Q You indicated in your previous answer
24 that most of the cases were brought by me or my
25 former partner, Scott Rothstein. My**

1 understanding is that there were more than 20
2 cases brought against you alleging you sexually
3 abused minors, and I have personally only filed
4 three. How many are you aware of in addition to
5 the three that Scott Rothstein filed, or brought,
6 as you say?

7 MR. PIKE: Form, mischaracterizes the
8 witness's testimony.

9 MR. EDWARDS: Do you want the previous
10 answer read back related to that?

11 MR. PIKE: No, I think his answer will
12 be the same.

13 A At least today I have to respond to that
14 question as I've responded to most of your other
15 questions here today, Mr. Edwards, which is, at
16 least today I have to assert my rights under the
17 Fifth, Sixth and Fourteenth Amendment.

18 **Q In a portion of your answer, you**
19 **indicated that Scott Rothstein fabricated cases.**
20 **Are you alleging that the case of Jane Doe**
21 **against Jeffrey Epstein is a fabricated case?**

22 MR. PIKE: Form.

23 A I would like to answer each one of your
24 questions here today, Mr. Edwards, especially
25 with respect to Jane Doe. However, my counsel

1 other questions, which is, that upon advice of
2 counsel, at least today, they've instructed me
3 that I must assert my rights under the Sixth,
4 Fifth and Fourteenth Amendment.

5 **Q Isn't it also true that through the**
6 **years he has sent you as, quote, unquote,**
7 **"gifts," underage females, as young as 12 years**
8 **old for you to illegally engage in sex with?**

9 MR. PIKE: Form.

10 A I'm going to respond to that question as
11 I responded to most of your other questions,
12 which is, upon advice of counsel, at least today,
13 though I would like to answer the question,
14 they've instructed me I must assert my rights
15 under the Sixth, Fifth and Fourteenth Amendment.

16 **Q In fact, you know that we served Mr.**
17 **Brunel for deposition in this case. Are you**
18 **aware of that?**

19 MR. PIKE: Form.

20 A I'm going to have to respond to that
21 question as I respond to all your other questions
22 here today, Mr. Edwards, which is by asserting my
23 rights under the Sixth, Fifth and Fourteenth
24 Amendment.

25 **Q He has been a house guest at your house**

1 has instructed me I must assert my rights under
2 the Sixth, Fifth and Fourteenth Amendment.

3 **Q Mr. Epstein, do you know a gentleman**
4 **named Jean Luc Brunel and the last name is**
5 **spelled B-r-u-n-e-l.**

6 MR. PIKE: Form.

7 A My counsel has advised me at least
8 today, Mr. Edwards, as I've responded to most of
9 your other questions, I have to assert my right
10 under the Sixth, Fifth and Fourteenth Amendment.

11 **Q Mr. Brunel is somebody that you know to**
12 **be a child molester; is that right?**

13 MR. PIKE: Form.

14 A I would like to answer every one of your
15 questions here today, Mr. Edwards. However, on
16 advice of counsel, they've instructed me I must
17 assert my rights under the Sixth, Fifth and
18 Fourteenth Amendment.

19 **Q Mr. Brunel has been a close friend of**
20 **yours for years and is still a close friend of**
21 **yours today; is that right?**

22 MR. PIKE: Form.

23 A Though I would like to answer every one
24 of your questions posed here today, I have to
25 answer that one as I've answered most of your

1 **on numerous occasions this year; isn't that**
2 **true?**

3 MR. PIKE: Form.

4 A Though I would like to answer every one
5 of your questions here today, Mr. Edwards, I have
6 to respond to that question on advice of counsel
7 the same way as I've responded to all of your
8 other questions, which is, I must assert my
9 rights under the Sixth, Fifth and Fourteenth
10 Amendment.

11 **Q I've asked you simply, if Mr. Brunel has**
12 **been a house guest of yours during the year 2010,**
13 **and you're choosing to invoke your Fifth**
14 **Amendment right against self-incrimination and**
15 **basing that on your counsel's advice.**

16 **Does your counsel know that you made**
17 **that representation to Probation already this**
18 **year?**

19 MR. PIKE: Form.

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

21 A Are you asking me what my counsel
22 knows?

23 **Q No.**

24 A I think you just asked what my counsel
25 knows.

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1 MR. PIKE: That's exactly what --
2 A You should ask my counsel.
3 **Q Here is my point: You've indicated to**
4 **your Probation Officer this year, in fact, I'll**
5 **ask it this way: Have you indicated to your**
6 **Probation Officer that Jean Luc Brunel has been a**
7 **house guest of yours during the year 2010?**
8 MR. PIKE: Form.
9 A I have been instructed by my counsel to
10 answer that question, as I have been instructed
11 to answer most of your other questions here
12 today, which is by asserting my rights under the
13 Sixth, Fifth and Fourteenth Amendment.
14 **Q Do you know an attorney named Tama**
15 **Kudman?**
16 MR. PIKE: Form -- actually that's not
17 "form." I withdraw that.
18 A No.
19 **Q Did Mr. Brunel tell you that Tama Kudman**
20 **was an attorney that was hired to represent him**
21 **in this case?**
22 MR. PIKE: I'm sorry, hold on.
23 MR. EDWARDS: Did Mr. Brunel tell him.
24 MR. PIKE: Okay, form.
25 A I'm going to have to answer that

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1 question as I've answered most of your other
2 questions here today, Mr. Edwards, which is by
3 asserting my rights under the Sixth, Fifth and
4 Fourteenth Amendment.
5 **Q And did you or some entity that you own**
6 **or control pay for the services of Tama Kudman to**
7 **represent Jean Luc Brunel, in this matter?**
8 MR. PIKE: Form.
9 A ... I'm going to have to assert my rights
10 under the Sixth, Fifth and Fourteenth Amendment
11 upon advice of counsel.
12 **Q I certainly don't want to get into this**
13 **too often during this deposition but it is**
14 **visibly noticed on the video that prior to the**
15 **invocation of the Fifth Amendment, there is a**
16 **shaking of the head which commonly indicates that**
17 **the answer is "No," and I just want to make sure**
18 **we are all on the same page, that that was not**
19 **your indication and that we can ignore those**
20 **types of body movements, as Mr. Pike instructed**
21 **me that was the case last time.**
22 MR. PIKE: I think that the record is
23 clear. The court reporter does not
24 understand nods of the head, shakes of the
25 head, "um-hum" --

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1 MR. EDWARDS: Agreed.
2 MR. PIKE: His response is his verbal
3 response.
4 MR. EDWARDS: I understand that, but
5 certainly if a witness is on the witness
6 stand we both know they are allowed to
7 observe the demeanor of the witness and part
8 of that demeanor is the nodding or shaking
9 of the head, which are common responses that
10 is we all know and understand. I just want
11 to make sure we are on the same page, the
12 jury can ignore those body movements?
13 MR. PIKE: As a matter of fact, and as
14 you know, since you tried several cases,
15 there is a patterned jury instruction from
16 the judge that says the jury can, in fact,
17 take it into consideration.
18 MR. HOROWITZ: That's the point.
19 MR. PIKE: I cannot instruct the jury in
20 this video deposition to ignore anything
21 that occurs on this video.
22 MR. EDWARDS: That's why I wanted to
23 engage -- so I would make sure -- we are a
24 little inconsistent obviously as to what the
25 jury should be observing, what they can,

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1 versus his response. I guess for this time
2 we will get into it.
3 **Q In that last question that I asked you,**
4 **related to you or some entity that you control**
5 **paying for the services of Ms. Kudman, is the**
6 **answer "no" or is the answer that you are**
7 **invoking your Fifth Amendment right to remain**
8 **silent?**
9 MR. PIKE: Form.
10 A With respect to that question, as with
11 respect to all your other questions here today,
12 Mr. Edwards, upon advice of counsel I have to
13 assert my rights under the Sixth, Fifth and
14 Fourteenth Amendment.
15 **Q Isn't it true that you have specifically**
16 **instructed Mr. Brunel to avoid his deposition in**
17 **this case?**
18 MR. PIKE: Form.
19 A Upon advice of counsel, as with respect
20 to most of your other questions here today, I'm
21 going to answer that the same way by invoking my
22 rights under the Sixth, Fifth and Fourteenth
23 Amendment, sir.
24 **Q Mr. Epstein, can you describe for the**
25 **jury your various schemes that you have devised**

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1 **to access underage minor females for sex?**
2 MR. PIKE: Form.
3 A Though I would like to respond to all
4 these questions that you've posed here today, Mr.
5 Edwards, I'm going to have to assert my rights
6 under advice of counsel under the Sixth, Fifth
7 and Fourteenth Amendment.
8 **Q I think the video will reflect that**
9 **prior to your invocation at that time there was a**
10 **smile that I would characterize as a smirk, prior**
11 **to that answer, and I would like to understand,**
12 **was there any intention on your part to convey a**
13 **message by that smile, prior to your invocation?**
14 MR. PIKE: First of all, this line of
15 questioning is not only argumentative, but
16 it is harassing, okay?
17 MR. EDWARDS: We can play the video for
18 whether or not it is harassing.
19 MR. PIKE: You can play the video, but
20 if someone raises an eyebrow, blinks, does
21 something, it is... it is... for you to
22 follow up with a harassing question is not
23 only improper, but it is a waste of time, of
24 attorney resources as well as judicial
25 resources. I'm going to let you proceed, I

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1 mean, but... -- come on.
2 MR. EDWARDS: With all due respect, I'm
3 interpreting it as an intentional act
4 designed to dilute the invocation of the
5 Fifth Amendment and any adverse inference
6 that we may be entitled to, and I think that
7 you acknowledged previously that a jury will
8 have or could have the ability to view this
9 video, and I'm assuming a jury could make
10 that same inference, so I want to make sure
11 the record is just crystal clear. If the
12 answer is one answer and there is no body
13 movement, then I'll move on. If there is
14 body movement, I'm probably going to address
15 it.
16 MR. PIKE: I'm going to move to strike
17 your last narrative.
18 MR. EDWARDS: Okay.
19 **Q What individuals other than yourself**
20 **helped you to devise your various schemes for**
21 **accessing large numbers of minor females for**
22 **sex?**
23 MR. PIKE: Form.
24 A Though I would like to answer every one
25 of your questions today, Mr. Edwards, upon advice

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1 of my counsel, he's instructed me that I may
2 not. I must invoke my rights under the Sixth,
3 Fifth and Fourteenth Amendment.
4 **Q Mr. Epstein, is it true that you have**
5 **sexually molested underage minors in every**
6 **community where you have homes or houses?**
7 MR. PIKE: Form.
8 A Though I would like to answer each one
9 of your questions here today, Mr. Edwards, I
10 would like to answer that question, to you and
11 your partner, who sits in jail for fabricating
12 cases of a sexual nature against people like me
13 and others in South Florida, but today, upon
14 advice of my counsel, they've instructed me I
15 must assert my rights under the Fifth, Sixth and
16 Fourteenth Amendment.
17 THE WITNESS: Before you go to the
18 bathroom?
19 MR. EDWARDS: Move to strike the portion
20 of the answer that was nonresponsive.
21 MR. PIKE: One second.
22 MR. EDWARDS: Move to strike the portion
23 of the answer nonresponsive.
24 MR. PIKE: Move to strike your motion to
25 strike.

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1 MR. EDWARDS: Based on the fact that it
2 was responsive? You feel it was
3 responsive?
4 MR. PIKE: Absolute -- listen --
5 MR. EDWARDS: It is fine if you do.
6 MR. PIKE: You're harassing the witness,
7 you're talking about heads and nod shakes.
8 If you want to be clear for the record, I
9 think, and I'm -- I think -- I think the
10 witness is nodding and shaking his head in a
11 manner because your questions are
12 argumentative. "Please tell me the scheme
13 that you devised."
14 "Please tell me who you molested," all
15 of these are argumentative questions --
16 MR. EDWARDS: If it wasn't true, it
17 would be argumentative.
18 MR. PIKE: They are just not formed
19 right. You are sitting here subjecting the
20 witness to questions that -- that are just
21 argumentative. They are not structured
22 appropriately, and you're taking that and
23 you're implying something else for the jury
24 on the record, and quite frankly, I don't
25 appreciate that. So, yes, to answer your

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1 question, it 100 percent is responsive. He
2 is invoking his Sixth, Fifth and
3 Fourteenth.
4 THE WITNESS: Bathroom break now?
5 MR. EDWARDS: That's fine.
6 THE VIDEOGRAPHER: Off the video record
7 12:35 p.m.
8 (Pause in the proceedings.)
9 MR. EDWARDS: I will be asking you to
10 read back the last question and answer, so
11 you're ready.
12 THE COURT REPORTER: Certainly.
13 THE VIDEOGRAPHER: Back on the video
14 record 1:16 p.m.
15 MR. EDWARDS: Madam Court Reporter, if
16 you could read back the last question, as
17 well as the last answer which I have been
18 told was responsive.
19 THE COURT REPORTER: Certainly.
20 (The record was read.)
21 **Q Mr. Epstein, why is it that you would**
22 **like to tell Scott Rothstein whether you have**
23 **sexually molested underage minors in the various**
24 **communities where you have homes?**
25 MR. PIKE: Form. Mischaracterizes the

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1 witness's testimony.
2 A I would like to answer that question, as
3 well as all of your other questions, Mr. Edwards,
4 however today my counsel has advised me I must
5 assert my rights under the Sixth, Fifth and
6 Fourteenth Amendment.
7 **Q Can you tell the jury what, if anything,**
8 **Scott Rothstein has to do with the allegations of**
9 **you molesting underage children?**
10 MR. PIKE: Form.
11 A Though I think the jury will find out
12 what Scott Rothstein has to do with all these
13 cases, I hope that's the case. I have been
14 instructed by my counsel to respond to all of
15 your questions, most of your questions here
16 today, but I have to assert my Sixth, Fifth and
17 Fourteenth Amendment.
18 MR. EDWARDS: More to strike the portion
19 of nonresponsive related to Scott Rothstein.
20 **Q Is it true for the better part of two**
21 **decades you have interacted sexually with**
22 **underage minors on a daily basis?**
23 MR. PIKE: Form.
24 A I would like to answer every one of your
25 questions here today, Mr. Edwards, especially

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1 that one, however, upon advice of counsel they've
2 instructed me that I must assert my rights under
3 the Sixth, Fifth and Fourteenth Amendment, and if
4 I don't do so, I risk losing that representation.
5 **Q What is special about the question of**
6 **you molesting children on a daily basis for the**
7 **better part of two decades, that you would**
8 **especially like to answer that question?**
9 MR. PIKE: I'm sorry?
10 MR. EDWARDS: His answer was that he
11 would especially like to answer that
12 previous question and the question posed to
13 him was...
14 **Q Isn't it true for the better part of two**
15 **decades you have molested children on an every**
16 **day basis. And I'm asking now, what is it about**
17 **that question that makes you especially want to**
18 **respond to that one?**
19 MR. PIKE: Form.
20 A Though I would like to answer that
21 question as well as your other questions here
22 today, Mr. Edwards, upon advice of counsel,
23 they've told me I must assert my rights under the
24 Sixth, Fifth and Fourteenth Amendment, or risk
25 losing my representation.

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1 **Q Is it true that you have intentionally**
2 **preyed on vulnerable children as young as 12**
3 **years old on an every day basis, for sexual**
4 **purposes for the last decade?**
5 MR. PIKE: Form.
6 A Though I would like to respond to that
7 question, as well as other questions posed by
8 you,, and I would prefer to respond to both you
9 and your partner, Scott Rothstein, who sits in
10 jail for fabricating questions of a sexual
11 nature, cases of a sexual nature against people
12 like me and others in South Florida. You were
13 part of a law firm that the U.S. Attorney refers
14 to as one of the largest criminal enterprises in
15 South Florida's history, so though I would like
16 to answer, and you will probably mark my question
17 as nonresponsive, my counsel has told me today I
18 must not answer that question and must assert my
19 Sixth, Fifth and Fourteenth Amendment right.
20 MR. EDWARDS: Move to strike the answer
21 as nonresponsive. All other portions
22 portion of the answer, all but the
23 invocation of the Fifth Amendment.
24 **Q Please describe for the jury the plan or**
25 **scheme that you employed to access the underage**

1 **minor females of Palm Beach County, including**
 2 **Jane Doe.**
 3 MR. PIKE: Form.
 4 A I would like to answer that question as
 5 I would like to have answered most of your other
 6 questions here today, especially with respect to
 7 Jane Doe, as she is your client, but on advice of
 8 counsel they've instructed me that I must, must
 9 assert my Sixth Amendment, Fifth Amendment and
 10 Fourteenth Amendment right, so therefore that's
 11 what I'm going to do.
 12 **Q Despite your preference you're going to**
 13 **listen to your counsel.**
 14 MR. PIKE: Form, I'm going to instruct
 15 you not to answer that question.
 16 MR. EDWARDS: As to whether or not he is
 17 going to listen to counsel?
 18 MR. PIKE: He's already invoked on
 19 advice of counsel.
 20 MR. EDWARDS: That last question was
 21 taken right out of Bob Critton's play book.
 22 MR. PIKE: Take it up with the Court.
 23 Bob Critton is not here, I am.
 24 **Q Isn't it true as part of the plan to**
 25 **access young girls between 12 and 17 years old in**

1 **Palm Beach County, that you would send a message**
 2 **that you would be willing to pay those females**
 3 **for them providing you a massage at your house?**
 4 MR. PIKE: Form.
 5 A You have to repeat the question.
 6 **Q Sure. The initiation, the manner in**
 7 **which you gained access to underage girls between**
 8 **the ages of 12 and 17 in Palm Beach, is that you**
 9 **would initially have somebody tell them that they**
 10 **could come to your house and give you a massage**
 11 **and you would pay them for their time.**
 12 MR. PIKE: Form.
 13 THE WITNESS: It is not a question.
 14 A You didn't ask me a question. You made
 15 a statement.
 16 THE WITNESS: If you want to repeat it
 17 back.
 18 (Indicating the court reporter.)
 19 **Q I'll make it clearer for you.**
 20 A Thank you.
 21 **Q Did you send a message to various**
 22 **underage minor females, that you would pay for**
 23 **those underage minor females to provide you a**
 24 **massage at your house?**
 25 MR. PIKE: Form.

1 A Though I would like to answer that
 2 question, as well as all the other questions
 3 you've posed here today, Mr. Edwards, upon advice
 4 of counsel, they've instructed me I must assert
 5 my rights under the Sixth, Fifth and Fourteenth
 6 Amendment.
 7 **Q With each and every underage minor**
 8 **female that arrived at your house under the idea**
 9 **they were to give you a massage, they were first**
 10 **led up and left alone in your bedroom with you;**
 11 **is that correct?**
 12 MR. PIKE: Form.
 13 A Again? Repeat the question.
 14 **Q This is a scheme that you've employed**
 15 **for years and years, and years, and somehow**
 16 **you're having a hard time grasping how a scheme**
 17 **that you devised worked?**
 18 MR. PIKE: No. Move to strike. You
 19 don't have a question on the table.
 20 Actually your previous question prior to
 21 what you just stated did not involve any
 22 word, quote, "scheme," end quote. If you
 23 want to repeat the question, go ahead.
 24 **Q Isn't this how it worked, that an**
 25 **underage minor female would come to your house**

1 **and you instructed or did you instruct**
 2 **or one of your other assistants to lead**
 3 **that minor female up to your bedroom to be left**
 4 **alone with you?**
 5 MR. PIKE: Form.
 6 A Though I would like to answer that
 7 question as well as all the other questions
 8 you've posed here today, Mr. Edwards, upon advice
 9 of my counsel they've instructed me I must assert
 10 my rights under the Sixth, Fifth and Fourteenth
 11 Amendment.
 12 **Q Once that underage minor female,**
 13 **normally between the ages of 12 and 17 would**
 14 **arrive in your bedroom, you would then appear**
 15 **naked or wearing only a towel each time; is that**
 16 **correct?**
 17 MR. PIKE: Form.
 18 A I would like to answer each one of your
 19 questions, Mr. Edwards. However, today my
 20 counsel has advised me that I must assert my
 21 rights under the Sixth, Fifth and Fourteenth
 22 Amendment.
 23 **Q After appearing naked or wearing only a**
 24 **towel, then wouldn't you instruct the underage**
 25 **minor female to get naked herself?**

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1 MR. PIKE: Form.
2 A: Though I would like to answer all of
3 your questions here today, I'm going to have to
4 respond to that question as I've responded to
5 most of your others here today, which is by my
6 counsel's instructing me that I must assert my
7 rights under the Fifth, Sixth and Fourteenth
8 Amendment.
9 Q: Then, once the underage minor female was
10 naked, you would attempt various lewd or
11 lascivious improper sexual acts against that
12 underage minor female, correct?
13 MR. PIKE: Form.
14 A: Though I would like to respond to all of
15 your questions, Mr. Edwards, I have to respond to
16 that as I responded to all of the other questions
17 here today that you've posed, which is that my
18 counsel, at least today, has instructed me I must
19 assert my rights under the Sixth, Fifth and
20 Fourteenth Amendment.
21 Q: And you would always pay cash money to
22 the underage minor female after you improperly
23 and/or illegally sexually abused that underage
24 minor female, correct?
25 MR. PIKE: Form.

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1 A: Though I would like to answer each and
2 every one of your questions here today, Mr.
3 Edwards, my counsel has advised me I must assert
4 my rights under the Sixth, Fifth and Fourteenth
5 Amendment.
6 Q: Each of these sessions or sexual
7 interactions between you and underage minor
8 females ended, when you had ejaculated, correct?
9 MR. PIKE: Form.
10 A: I would like to answer that question, as
11 I would like to answer all of your other
12 questions here today. However, today at least,
13 my counsel has instructed me that I must assert
14 my rights under the Sixth, Fifth and Fourteenth
15 Amendment.
16 Q: After paying the underage minor female
17 for being sexually molested, you would ask the
18 underage minor female to leave her telephone
19 number with one of your assistants; is that
20 correct?
21 MR. PIKE: Form.
22 A: I would like to answer that question. I
23 would like to answer most of your other questions
24 here today; however, at least today my counsel
25 has advised me that I may not, and must assert my

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1 rights under the Fifth, Sixth and Fourteenth
2 Amendment or, in fact, potentially lose my right
3 to representation.
4 Q: What you're saying with that answer is
5 that your counsel will not represent you anymore
6 if you choose to waive your Fifth Amendment
7 rights and begin to answer these questions?
8 MR. PIKE: No, not at all. On the
9 advice of counsel, if you know what the
10 Sixth Amendment is and how it reads, you
11 would understand what the invocation is, in
12 full. So move to strike your --
13 MR. EDWARDS: Question?
14 MR. PIKE: -- last question, and it
15 mischaracterizes the witness's testimony.
16 Do you know what the Sixth Amendment is, Mr.
17 Edwards?
18 MR. EDWARDS: Yes, and it is not my
19 deposition and I'm not sure your client
20 knows about the effective assistance of
21 counsel or any amendment --
22 MR. PIKE: Do you know how due process
23 clause affects the 6th Amendment?
24 Never mind, just go ahead. I'm sorry.
25 MR. EDWARDS: However, the statement was

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1 made if he answers the questions, as he
2 would prefer to do, which seems remarkable
3 and incredible, then he would be fired or
4 you would be fired from him, and I want to
5 understand what it...
6 Q: Why is it that your attorneys will no
7 longer represent you if you choose to do what you
8 want to do, which is answer these questions?
9 MR. PIKE: Move to strike.
10 Do you want to ask a question? Because
11 I'm not quite sure he even testified to
12 that. We have been through several
13 depositions and you are implying something
14 from the invocation of the Fifth, Sixth and
15 Fourteenth that does not exist. There has
16 been no mention of firing, there's been no
17 mention of withdrawing, there's been no
18 mention of anything of the sort.
19 MR. EDWARDS: Can we go back to the
20 question and response that ended with "I
21 risk losing my..."
22 THE COURT REPORTER: Certainly.
23 MR. PIKE: Once again, do you know that
24 the Sixth Amendment is?
25 MR. EDWARDS: Yes.

1 MR. PIKE: Would you like to Google it?
 2 Because that Sixth Amendment --
 3 MR. EDWARDS: She will have a hard time
 4 going back, if you continue talking. She
 5 has to type while you talk.
 6 MR. PIKE: The Sixth Amendment, as
 7 incorporated into the due process clause,
 8 which is the Fourteenth Amendment is the
 9 right to effective assistance of counsel.
 10 MR. EDWARDS: I understand.
 11 MR. PIKE: If you read it in full, it
 12 will kind of shed light and you can probably
 13 glean the invocation and the meaning of it
 14 from his response.
 15 Is there a question?
 16 MR. EDWARDS: Go back, please.
 17 (The record was read.)
 18 **Q So your counsel told you that you must**
 19 **invoke your Fifth Amendment right to remain**
 20 **silent, otherwise you will lose your right to**
 21 **their representation; is that what you're**
 22 **saying?**
 23 MR. PIKE: Move to strike.
 24 Mischaracterizes the witness's testimony,
 25 and invocation... misconstrues and

1 misinterprets the Fifth, Sixth and
 2 Fourteenth Amendments.
 3 I'm going to instruct you not to answer
 4 that question, because I don't understand
 5 it. It was not your response, and
 6 because --
 7 MR. EDWARDS: I wrote down the response.
 8 MR. PIKE: -- and because, if I
 9 understand, your question, you phrased it
 10 as, "So if I understand you, your attorney
 11 told you," so I'm going to instruct you not
 12 to answer that question because it will,
 13 apparently, it would disclose my
 14 communications with you, so there you go.
 15 MR. EDWARDS: In his answer he said, "My
 16 counsel said I can't respond," so he is
 17 telling me already what --
 18 MR. PIKE: That's not what he said. He
 19 said "On the advice of counsel."
 20 MR. EDWARDS: All right.
 21 **Q The offer was then made to each underage**
 22 **minor female that each time she returned to your**
 23 **home and you sexually molest her, she will then**
 24 **be paid cash; is that correct?**
 25 MR. PIKE: Form.

1 A Though I would like to answer that
 2 question as well as all the other questions
 3 you've posed here today, Mr. Edwards, I'm afraid
 4 that upon advice of counsel they've instructed me
 5 that I must assert my rights under the Sixth,
 6 Fifth and Fourteenth Amendment.
 7 **Q And a separate offer was made to each**
 8 **underage minor female as well. That is, if she**
 9 **brings you other underage minor females so that**
 10 **you can sexually abuse, then you would pay a**
 11 **finder's fee for each underage minor female**
 12 **brought to you; is that correct?**
 13 MR. PIKE: Form.
 14 A I would like to answer every one of the
 15 questions you've posed here today, Mr. Edwards.
 16 However, today at least, upon advice of counsel,
 17 they have instructed me I must assert my rights
 18 under the Sixth, Fifth and Fourteenth Amendment.
 19 **Q [REDACTED] was a female that brought**
 20 **you multiple underage minor females; is that**
 21 **correct?**
 22 MR. PIKE: Form.
 23 A Though I would like to answer every one
 24 of your questions that you've posed here today,
 25 my counsel has instructed me I must assert my

1 rights under the Sixth, Fifth and Fourteenth
 2 Amendment.
 3 **Q [REDACTED] was an underage minor female that**
 4 **you first abused when she was 13 years old; is**
 5 **that correct?**
 6 MR. PIKE: Form.
 7 A Though I would like to answer every
 8 question you have regarding L.M. here today, my
 9 counsel has instructed me that I must assert my
 10 rights under the Sixth, Fifth and Fourteenth
 11 Amendment.
 12 **Q While [REDACTED] was a minor, she brought you**
 13 **more than 50 underage minor females that you**
 14 **sexually abuse, correct?**
 15 MR. PIKE: Form.
 16 A I would like to answer all the questions
 17 you have regarding L.M., here today. However, at
 18 least today my counsel has instructed me I may
 19 not. I must assert my right under my Sixth,
 20 Fifth and Fourteenth Amendment.
 21 **Q One of the underage minor females**
 22 **brought to you by [REDACTED] was Jane Doe, when Jane**
 23 **Doe was age 14; is that correct?**
 24 MR. PIKE: Form.
 25 A I would like to answer the questions

1 regarding Jane Doe and [REDACTED]; Mr. Edwards.
2 However, at least today my counsel has instructed
3 me I must assert my rights under the Sixth, Fifth
4 and Fourteenth Amendment.

5 **Q Looking at the operative complaint in**
6 **Jane Doe versus Jeffrey Epstein case 80893,**
7 **referring to the plaintiff Jane Doe, first**
8 **indicates this is an action for damages in an**
9 **amount in excess of 50 million dollars.**

10 **Is that a number that you would agree**
11 **would fairly compensate her, as well as punish**
12 **you for the conduct you committed against Jane**
13 **Doe?**

14 MR. PIKE: Form.

15 A I would like to answer that question. I
16 would like to answer all of your other questions
17 that you've posed here today, Mr. Edwards.
18 However, at least today, on advice of counsel
19 they've instructed me that I may not and have
20 instructed me that I must assert my rights under
21 the Sixth, Fifth and Fourteenth Amendment.

22 **Q One of the allegations Jane Doe makes is**
23 **that Jeffrey Epstein demonstrated sexual**
24 **preference and obsession for minor girls. Is it**
25 **true that you have a sexual preference and**

1 **obsession for minor girls?**

2 MR. PIKE: Form.

3 A I would like to answer the question with
4 respect to what Jane Doe said, however, my
5 counsel today has instructed me that I must
6 assert my rights under the Sixth, Fifth and
7 Fourteenth Amendment.

8 **Q Another allegation is that defendant**
9 **Epstein's planned scheme and enterprise included**
10 **an elaborate system wherein the then minor**
11 **plaintiff and other minor girls were contacted by**
12 **telephone by Epstein, [REDACTED] or other**
13 **unknown employees or assistants working for**
14 **Epstein, and were then persuaded to come over to**
15 **Epstein's house for the purposes of engaging in**
16 **prostitution.**

17 **Is that a true statement?**

18 MR. PIKE: First, I'm going to object to
19 the form and second, I believe you're
20 working from a portion of a complaint
21 especially with your reference to scheme and
22 the RICO allegations that were dismissed
23 with prejudice. So, I just want to be
24 clear, are you doing discovery on a count
25 that no longer exists?

1 MR. EDWARDS: No, I'm asking if your
2 client agrees with the assertion that's
3 stated in the complaint, or if he has a
4 defense that is going to defeat such
5 assertion or evidence that is going to
6 defeat such assertion. So I'm simply asking
7 your client...

8 **Q Is that a true statement?**

9 MR. PIKE: Form.

10 A I would like to answer all of your
11 questions about Jane Doe and your other clients.
12 However, today my counsel has told me that I may
13 not. I must assert my rights under the Sixth,
14 Fifth and Fourteenth Amendment.

15 **Q You did personally call Jane Doe on the**
16 **telephone on at least one occasion; isn't that**
17 **true?**

18 MR. PIKE: Form.

19 A I would like to answer your questions
20 regarding calling Jane Doe, or contacting Jane
21 Doe. However, my counsel has instructed me that
22 today, at least, I may not. I must assert my
23 rights under the Sixth, Fifth and Fourteenth
24 Amendment.

25 **Q And at the time when you contacted Jane**

1 **Doe, was the purpose to have her come to your**
2 **house and interact with you sexually?**

3 MR. PIKE: Form.

4 A Can you repeat the question?

5 **Q Yes, the time that you called Jane Doe,**
6 **was the purpose of your call to have her come to**
7 **your house and interact with you sexually?**

8 MR. PIKE: Form.

9 A I would like to answer that question as
10 I would like to answer all of your other
11 questions with respect to Jane Doe, your client.
12 However, today at least, my counsel has
13 instructed me I must assert my rights under the
14 Sixth, Fifth and Fourteenth Amendment.

15 MR. EDWARDS: Move to strike a portion
16 of the answer that's nonresponsive.

17 **Q [REDACTED] was one of your assistants**
18 **back in the years 2003, 2004 and 2005, correct?**

19 A I would like to answer each one of your
20 questions, Mr. Edwards, here today; however, on
21 advice of counsel, at least today I'm going to
22 have to assert my rights under the Sixth, Fifth
23 and Fourteenth Amendment.

24 **Q [REDACTED] called by telephone Jane**
25 **Doe when Jane Doe was a minor child, on more than**

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1 **15 occasions; isn't that true?**
2 MR. PIKE: Form.
3 A Mr. Edwards, I would like to answer
4 every one of your questions regarding Jane Doe
5 that you've posed here today. However, at least
6 today, on advice of counsel I'm going to have to
7 assert my rights under the Sixth, Fifth and
8 Fourteenth Amendment.
9 **Q The purpose of [REDACTED] contacting**
10 **the minor child Jane Doe back in 2003, 2004 and**
11 **2005, was always to get her to come to your house**
12 **to interact with you sexually; is that correct?**
13 MR. PIKE: Form.
14 A I would like to answer that question as
15 well as all your other questions you've posed
16 here today regarding your client, Jane Doe.
17 However, at least today, my counsel has advised
18 me I must assert my rights under the Sixth, Fifth
19 and Fourteenth Amendment.
20 **Q Did you or [REDACTED] or any of your**
21 **other assistants contact Jane Doe for some other**
22 **purpose than to have her come to your house for**
23 **you to sexually molest her?**
24 MR. PIKE: Form.
25 A Though I would like to answer every

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1 question that you've posed here today regarding
2 Jane Doe, Mr. Edwards, my counsel has advised me,
3 at least today, that I may not and must assert my
4 rights under the Fifth, Sixth and Fourteenth
5 Amendment.
6 **Q Each call that was made by you or on**
7 **your behalf to Jane Doe, was made at a time when**
8 **Jane Doe was a minor child, true?**
9 MR. PIKE: Form.
10 A I would like to answer that question as
11 well as all your other questions with regard to
12 Jane Doe, Mr. Edwards. However, today my counsel
13 has advised me I may not and must assert my
14 rights under the Sixth, Fifth and Fourteenth
15 Amendment.
16 **Q In addition to your Palm Beach home,**
17 **isn't it true that you own a, what has been**
18 **called a mansion in New York, a ranch in New**
19 **Mexico, a home in France, as well as an island in**
20 **the Virgin Islands?**
21 MR. PIKE: Form.
22 A I'm sorry, but today at least, on advice
23 of counsel I have to assert my rights to the
24 Sixth, Fifth and Fourteenth Amendment.
25 **Q Isn't it true that you traveled by way**

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1 **of your private airplane to Palm Beach for the**
2 **specific purpose of luring minor girls to your**
3 **mansion for the purposes of sexually abusing**
4 **them?**
5 MR. PIKE: Form.
6 A I would like to answer that question,
7 Mr. Edwards,, but today at least, on advice of
8 counsel, they've instructed me to assert my
9 Sixth, Fifth and Fourteenth Amendment rights.
10 **Q Isn't it true that you conspired with**
11 **others to contact minor females including Jane**
12 **Doe, for the purposes of sexually abusing Jane**
13 **Doe?**
14 MR. PIKE: Form.
15 A I would like to answer that question,
16 Mr. Edwards, as well as every other question
17 you've posed here today. However, at least today
18 upon advice of counsel they've instructed me to
19 assert my Sixth, Fifth and Fourteenth Amendment
20 right.
21 **Q Isn't it true that your sexual**
22 **interaction with Jane Doe occurred specifically**
23 **during the time period, February 2003 through**
24 **June 2005?**
25 MR. PIKE: Form.

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1 A I'm going to have to respond to that,
2 Mr. Edwards, as I've responded to all your other
3 questions, which is that today at least on advice
4 of counsel I must assert my rights under the
5 Sixth, Fifth and Fourteenth Amendment.
6 **Q During the time Jane Doe was under the**
7 **age of 16, isn't it true that you digitally**
8 **penetrated her vagina?**
9 MR. PIKE: Form.
10 A I would like to answer that question, as
11 well as your other questions. However, at least
12 today my counsel has advised me I must assert my
13 rights under the Sixth, Fifth and Fourteenth
14 Amendment.
15 **Q Immediately following that question, you**
16 **clearly smiled and rolled your eyes. Is there**
17 **anything that we should read or the jury should**
18 **read into that body language?**
19 MR. PIKE: I'm going to instruct you not
20 to answer the question.
21 I move to strike it as harassing.
22 MR. EDWARDS: Move to strike what as
23 harassing? It is something that everybody
24 is going to be able to see and I want to
25 know what it means, if anything.

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1 MR. PIKE: I'm instructing him not to
2 answer.
3 MR. EDWARDS: How are you instructing
4 not to answer a question?
5 MR. PIKE: Because I am.
6 MR. EDWARDS: Based on what?
7 MR. PIKE: Because it is harassing.
8 MR. EDWARDS: I'm not harassing. I want
9 to know why he did what he did.
10 MR. PIKE: You are harassing him. I
11 mean, it is an argumentative question --
12 MR. EDWARDS: He harassed my clients.
13 MR. PIKE: -- he has been here since
14 10:00 o'clock. He's given several
15 depositions. This is Volume III of a
16 continuation, okay? He's sitting here
17 waiting for your questions but not waiting
18 to be harassed.
19 **Q There is a way to prevent those**
20 **questions, and that's not do that type of rolling**
21 **your eyes.**
22 MR. PIKE: You're not going to instruct
23 the witness on how to -- the witness is here
24 behaving professionally --
25 MR. EDWARDS: In your mind.

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1 MR. PIKE: -- Answering your questions,
2 invoking his Constitutional rights under the
3 United States Constitution. And I'm sorry
4 that that doesn't make you happy, but I'm
5 not here --
6 MR. EDWARDS: It doesn't make him happy
7 either, apparently.
8 MR. PIKE: -- I'm not here to dispute
9 and debate with you what privileges are
10 being invoked and whether you feel it is
11 right or wrong. If you have a question, ask
12 the witness a question.
13 **Q Why did you roll your eyes when I asked**
14 **you if you digitally penetrated Jane Doe when she**
15 **was 14 and 15 years old?**
16 MR. PIKE: I'm instructing you not to
17 answer that question.
18 MR. EDWARDS: Your reason for the
19 instruction is based on some privilege?
20 MR. PIKE: My reason for the instruction
21 is that you are attempting to play fast and
22 loose with the Fifth Amendment and adverse
23 inference.
24 MR. EDWARDS: I'm not.
25 MR. PIKE: Yes, you are, and I'm not

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1 going to let it happen, not on my watch, not
2 today. You can take it up with the Court.
3 MR. EDWARDS: I will.
4 MR. PIKE: Mark the record. If you
5 will.
6 MR. EDWARDS: It is marked. I'm just
7 wondering whether there is going to be a
8 privilege asserted or it is just going to be
9 a blanket, "I'm telling the witness not to
10 answer," related to something that the jury
11 is going to view and should be entitled to
12 know what it means.
13 MR. PIKE: (Counsel shrugs.)
14 MR. EDWARDS: You just don't like that
15 your client is giving those body language
16 responses.
17 MR. PIKE: No. Move to strike. It has
18 nothing do with that. It has to do with a
19 significant fact, that on a legal basis
20 you're attempting to badger and harass the
21 witness, based upon what you believe are
22 some sort of facial expressions and you're
23 attempting to get an adverse inference from
24 an answer. I'm not going to let him answer
25 a harassing question, so you can then get an

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1 adverse inference relative to some gesture.
2 MR. EDWARDS: We will take it up, fine.
3 MR. PIKE: Take it up.
4 **Q Mr. Epstein, isn't it also true that you**
5 **used a vibrator or vibrating device on Jane Doe's**
6 **vagina when she was under the age of 16?**
7 MR. PIKE: Form.
8 A I would like to answer all of your
9 questions, Mr. Edwards. However, today on advice
10 of counsel, they've advised me that I may not and
11 must assert my rights under the Sixth, Fifth and
12 Fourteenth Amendment.
13 **Q Isn't it also true when Jane Doe was a**
14 **minor child, that you masturbated on multiple**
15 **occasions in her presence?**
16 MR. PIKE: Form.
17 A I would like to answer all of your
18 questions regarding Jane Doe. However, today my
19 counsel has advised me that I may not, and have
20 instructed me to assert my rights under the
21 Sixth, Fifth and Fourteenth Amendment.
22 **Q In June of 2008, isn't it true, sir,**
23 **that you entered pleas of guilty to various**
24 **felony -- to two felony charges in Palm Beach**
25 **County?**

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1 MR. PIKE: Asked and answered within
2 this deposition.
3 A Yes.
4 Q And as a result of those guilty pleas
5 you were sentenced to 18 months incarceration in
6 Palm Beach County jail; is that correct?
7 MR. PIKE: Asked and answered.
8 A Yes.
9 Q In addition to the sentence related to
10 those felony charges, isn't it also true that you
11 entered into an agreement known as the
12 "Nonprosecution Agreement," with the federal
13 government?
14 MR. PIKE: I'm sorry, would you read
15 that back, Madam Court Reporter?
16 (The record was read.)
17 MR. PIKE: Can you reword the question?
18 MR. EDWARDS: Sure.
19 Q Did you enter into an agreement with the
20 federal government that is entitled
21 "Nonprosecution Agreement"?
22 A Yes.
23 Q And that Nonprosecution Agreement at
24 paragraph 7 indicates that "The United States
25 shall provide Epstein's attorneys with a list of

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1 individuals whom it has identified as victims, as
2 defined in 18 USC 2255, after Epstein has signed
3 this agreement, and been sentenced." Have you
4 seen the names of the identified victims that
5 were supplied by the U.S. Attorney's office?
6 A I would like to answer that question as
7 I would like to answer most of your other
8 questions here today, Mr. Edwards. However, upon
9 advice of counsel they've instructed me that I
10 must assert my rights under the Sixth, Fifth and
11 Fourteenth Amendment.
12 Q And isn't it true that Jane Doe was on
13 that list of victims that was supplied to you by
14 the United States?
15 A I would like to answer that question.
16 However, at least today my attorneys have advised
17 me that I must assert my rights under the Sixth,
18 Fifth and Fourteenth Amendment.
19 Q In paragraph eight of the Nonprosecution
20 Agreement between you, Mr. Epstein, and the
21 United States Attorney's Office, it indicates,
22 "If any of the individuals, referred to in
23 paragraph 7," referring to the list of victims,
24 "elects to file a lawsuit pursuant to 18 USC
25 2255, Epstein waives his right to contest

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1 liability"?
2 Are you familiar with that section of
3 the agreement?
4 MR. PIKE: Form, and the document speaks
5 for itself.
6 A The document speaks for itself.
7 Q Are you familiar with that portion of
8 the document?
9 A I'm not sure what you mean by "familiar
10 with," sir.
11 Q Have you read it?
12 A Yes.
13 Q So, if Jane Doe were to bring a claim
14 exclusively under 18 USC 2255, then you already
15 contractually agreed to waive your right to
16 contest liability to that claim; is that true?
17 MR. PIKE: Form, and calls for a legal
18 conclusion.
19 A Upon advice of counsel, though I would
20 like to answer all of your questions here today,
21 they've instructed me I must assert my rights
22 under the Sixth, Fifth and Fourteenth Amendment.
23 THE WITNESS: Five minutes?
24 MR. EDWARDS: Whatever you need.
25 THE WITNESS: Okay.

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1 THE VIDEOGRAPHER: Going off the video
2 record 1:51 p.m.
3 (Pause in the proceedings.)
4 THE VIDEOGRAPHER: Back on the video
5 record 1:57 p.m.
6 Q The specific federal statute that is
7 incorporated in the Nonprosecution Agreement, 18
8 USC 2255, states -- rather than do it that way,
9 let me just ask the question.
10 Mr. Epstein, did you knowingly conspire
11 with others to use a telephone to persuade,
12 induce or entice minor females, including Jane
13 Doe, to engage in prostitution?
14 MR. PIKE: Form.
15 A Though I would like to answer that
16 question, as most of your other questions, I have
17 to respond by telling you that my attorneys have
18 told me, at least today, that I must assert my
19 rights under the Sixth, Fifth and Fourteenth
20 Amendment.
21 Q Mr. Epstein, did you knowingly and
22 willfully conspire with others to travel
23 interstate for the purpose of engaging in illicit
24 sexual conduct with minors, including Jane Doe?
25 MR. PIKE: Form.

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1 A Though I would like to answer that
2 question, as well as most of your other questions
3 here today, Mr. Edwards, in fact, all of the
4 other questions here today, my counsel has
5 instructed me at least today, I must assert my
6 rights under the Fifth, Sixth and Fourteenth
7 Amendment.

8 Q Mr. Epstein, did you use a telephone to
9 knowingly persuade, induce or entice minor
10 females, including Jane Doe, to engage in
11 prostitution?

12 MR. PIKE: Form.

13 A Though I would like to answer that
14 question, as well as your other questions today,
15 Mr. Edwards, at least today, my counsel has
16 instructed me that I must assert my rights under
17 the Sixth, Fifth and Fourteenth Amendment.

18 Q Mr. Epstein, did you travel, interstate
19 commerce for the purpose of engaging in illicit
20 sexual conduct with minor females, including Jane
21 Doe?

22 MR. PIKE: Form.

23 A Though I would like to answer that
24 question, as well as the other questions you've
25 posed here today, Mr. Edwards, I'm afraid that my

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1 counsel has instructed me that I must assert my
2 rights under the Sixth, Fifth and Fourteenth
3 Amendment.

4 Q Isn't it true that you agreed with the
5 federal government that if Jane Doe brought
6 claims exclusively alleging those sections of 18
7 USC 2255 that I've read in the preceding, four
8 paragraphs, that you would admit liability unto
9 her as an identified victim?

10 MR. PIKE: Form.

11 A I don't believe that's what the document
12 says.

13 Q The document says, "If any of the
14 individuals referred to in paragraph 7 elects to
15 file suit pursuant to 18 USC 2255, Epstein waives
16 his right to contest liability, and also waives
17 his right to contest damages up to an amount as
18 agreed to between the identified individual and
19 Epstein, so long as the identified individual
20 elects to proceed exclusively under 18 USC
21 2255."

22 That's the provision. I'll ask you then
23 the question: Didn't you agree with the federal
24 government that if Jane Doe, an identified
25 victim, proceeds in a case against you,

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1 exclusively under 18 USC 2255, that you waived
2 your right to contest liability?

3 MR. PIKE: Form. Also, could call for
4 the disclosure of attorney/client
5 communications and work product, and is
6 protected under the Federal Rule of Evidence
7 502408, as well as 410?

8 A Though I would like to answer that
9 question, Mr. Edwards, I have to invoke my rights
10 under the Sixth, Fifth and Fourteenth Amendment.

11 Q In a recent motion for summary judgment
12 filed on your behalf, a statement is made,
13 "Epstein never using a facility or means of
14 interstate commerce, knowingly persuaded, induced
15 or enticed Jane Doe when she was under the age of
16 18 years, to engage in prostitution or sexual
17 activity for which any person can be charged with
18 a criminal offense or attempted to do so." That
19 is a false statement, true?

20 MR. PIKE: Form.

21 A Though I would like to answer that
22 question, on advice of counsel I have been
23 instructed to assert my rights under the Sixth,
24 Fifth and Fourteenth Amendment.

25 Q The statement was also made on your

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1 behalf, "Epstein never attempted to or conspired
2 to knowingly transport Jane Doe in interstate or
3 foreign commerce or in any Commonwealth territory
4 or possession of the United States, with intent
5 that Jane Doe engage in prostitution or in any
6 sexual activity for which any person can be
7 charged with a criminal offense."

8 That is also a false statement; isn't
9 that right?

10 MR. PIKE: Form.

11 A You said "Jane Doe."

12 Q Jane Doe is Jane Doe in this case.

13 MR. PIKE: Form.

14 A I believe her deposition speaks to
15 that. With respect to anything else, I have to
16 assert my rights under the Sixth, Fifth and
17 Fourteenth Amendment.

18 Q You believe that Jane Doe's deposition
19 speaks to whether you attempted or conspired to
20 knowingly transfer Jane Doe in interstate
21 commerce, correct?

22 MR. PIKE: Form.

23 Q You believe her deposition speaks to
24 that?

25 A That's my belief, yes.

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1 **Q** And then would you adopt her deposition
2 testimony as true and as your support for that
3 assertion?
4 MR. PIKE: Form.
5 A You're asking her entire deposition
6 testimony?
7 **Q** The deposition as it relates to whether
8 or not you knowingly transported her in
9 interstate commerce.
10 A Well, I would like to answer that
11 question, but on advice of counsel, at least
12 today, I have been instructed to assert my rights
13 under the Sixth, Fifth and Fourteenth Amendment.
14 **Q** A statement that Epstein never attempted
15 to or conspired to travel in interstate commerce
16 or travel into the United States or travel in
17 foreign commerce for the purpose of engaging in
18 illicit sexual conduct with Jane Doe," is also a
19 false statement, isn't it?
20 MR. PIKE: Form?
21 A I would like to answer that question as
22 well as your other questions, Mr. Edwards.
23 However, today my counsel has instructed me that
24 I must assert my Fifth, Sixth and Fourteenth
25 Amendment right.

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1 **Q** The statement that Epstein never
2 attempted to or conspired to travel in foreign
3 commerce and engage in any illicit sexual conduct
4 with Jane Doe, is also a false statement; isn't
5 that right?
6 MR. PIKE: Form.
7 A I would like to that question as well as
8 the other questions posed today, Mr. Edwards.
9 However, on the advice of counsel they've
10 instructed me to assert my Sixth, Fifth and
11 Fourteenth Amendment right.
12 **Q** In fact, you did contact Jane Doe when
13 she was a minor child as well as conspired to use
14 a telephone to contact Jane Doe when she was a
15 minor child, specifically for the purposes of
16 engaging in illicit sexual conduct with Jane Doe,
17 true?
18 MR. PIKE: Form.
19 A Though I would like to answer that
20 question as well as your other questions posed
21 here today, Mr. Edwards, I have been instructed
22 by my counsel that I must assert my rights under
23 the Sixth, Fifth and Fourteenth Amendment.
24 **Q** Did you intentionally touch Jane Doe on
25 her person and against her will or without her

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1 **legal consent?**
2 MR. PIKE: One second... Form.
3 A Without her legal consent?
4 **Q** Yes.
5 A Can you tell me what that means?
6 **Q** In order to answer that question, I need
7 to explain to you what legal consent means?
8 A Yes, sir.
9 **Q** Let's start with this question --
10 A Can you explain it to me?
11 **Q** Do you believe that a 14-year old child
12 can legally consent to sexual interaction with a
13 man like you that was over the age of 50?
14 MR. PIKE: Form.
15 THE WITNESS: Asking for a legal...
16 MR. PIKE: Go ahead and invoke?
17 A I would like to answer that question, if
18 I understood it correctly. However, my attorneys
19 have advised me today at least to invoke my
20 Sixth, Fifth and Fourteenth Amendment right.
21 MR. PIKE: And I think you skipped over
22 a question because you went from the first
23 question, and the witness was --
24 MR. EDWARDS: Asking for a definition?
25 MR. PIKE: Asking for a definition, so

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1 he could properly interpret your question
2 and attempt to answer it.
3 **Q** I'm understanding that, based on your
4 answer, that my question, "Did you intentionally
5 touch Jane Doe without her legal consent?" And
6 your response, depends on the definition of
7 "legal consent;" is that true?
8 MR. PIKE: I think that the witness --
9 as people regularly do as deponents, ask for
10 clarification of a question, and Mr. Epstein
11 asked you to clarify what, "legal consent"
12 was. If you wish to do that, then I guess
13 he could potentially understand your
14 question. However, if you don't want to do
15 that, then I guess we can just move on.
16 **Q** This will provide the answer: How old
17 was Jane Doe when you touched her?
18 MR. PIKE: Form. Assumes facts not in
19 evidence.
20 A I -- I -- I don't know how to answer
21 that question. I'll have to assert my Fifth
22 Amendment, Sixth Amendment and Fourteenth
23 Amendment right.
24 **Q** Tell me why you're having trouble
25 answering the question and I'll clarify the

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1 **question for you so it will be easier for you to**
2 **answer.**
3 MR. PIKE: You've answered the
4 question.
5 MR. EDWARDS: His response was he
6 doesn't know how to answer the question. I
7 want to help him. I want to make sure that
8 the jury understands the question and the
9 answer.
10 MR. PIKE: He invoked the Fifth, Sixth
11 and Fourteenth.
12 **Q Mr. Epstein, did you touch Jane Doe in**
13 **intimate areas of her body when she was a minor**
14 **child?**
15 MR. PIKE: Form.
16 A I would like to answer that question,
17 all your questions with respect to Jane Doe, Mr.
18 Edwards. However, today at least, my counsel has
19 advised me that I must assert my rights under the
20 Sixth, Fifth and Fourteenth Amendment.
21 **Q In fact, didn't you touch Jane Doe in**
22 **intimate areas of her body, including her vagina,**
23 **her breasts, and her buttocks on dozens of**
24 **occasions between February 2003 and June 2005?**
25 MR. PIKE: Form.

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1 A Though I would like to answer every
2 question about Jane Doe that you've posed here
3 today, Mr. Edwards, upon advice of counsel, at
4 least today, they've instructed me I must assert
5 my rights under the Sixth, Fifth and Fourteenth
6 Amendment.
7 **Q Do you agree that the inappropriate**
8 **sexual conduct, that your inappropriate sexual**
9 **conduct towards Jane Doe, was both extreme and**
10 **outrageous?**
11 MR. PIKE: Form.
12 A I would like to answer all of your
13 questions with respect to Jane Doe that you've
14 posed here today, Mr. Edwards. However, upon
15 advice of counsel, they've instructed me that I
16 must assert my rights under the Sixth, Fifth and
17 Fourteenth Amendment.
18 **Q Do you also agree that your sexual**
19 **interaction with Jane Doe when she was a minor**
20 **child was outrageous and so extreme in degree**
21 **that it should not be tolerated in a civilized**
22 **community?**
23 MR. PIKE: Form.
24 A I would like to respond to all your
25 questions with respect to your client, Jane Doe.

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1 However, at least today, my counsel has
2 instructed me I must assert my rights under the
3 Sixth, Fifth and Fourteenth Amendment.
4 **Q Do you see yourself, Mr. Epstein, as a**
5 **danger to the middle school and high school**
6 **children in the Palm Beach community?**
7 MR. PIKE: Form.
8 A Though I would like to answer that
9 question, as well as the other questions that
10 you've posed here today, Mr. Edwards, my counsel
11 has instructed me I must respond by asserting my
12 rights under the Sixth, Fifth and Fourteenth
13 Amendment.
14 **Q When you engaged in illegal sexual**
15 **conduct with Jane Doe, was it your intent to**
16 **cause her severe emotional distress?**
17 MR. PIKE: Form.
18 A Though I would like to answer every
19 question with respect to Jane Doe, Mr. Edwards,,
20 at least today my counsel has advised me that I
21 must assert my rights under the Sixth, Fifth and
22 Fourteenth Amendment.
23 **Q When you engaged in sexual conduct with**
24 **Jane Doe when she was a minor child, age 14, 15,**
25 **16 and 17, would you agree that you showed**

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1 **reckless disregard with the high probability of**
2 **causing severe emotional distress to Jane Doe?**
3 MR. PIKE: Form.
4 A Though I would like to answer all your
5 questions that you've posed here today regarding
6 Jane Doe, on advice of counsel, at least today,
7 they've instructed me I must assert my rights
8 under the Sixth, Fifth and Fourteenth Amendment.
9 **Q Mr. Epstein, did you coerce Jane Doe**
10 **into prostitution?**
11 A ... Again?
12 **Q Did you coerce Jane Doe into**
13 **prostitution?**
14 A Can you tell me what you mean by
15 "coerce," please?
16 **Q Tell me, how did you --**
17 A I've asked you a simple question. Can
18 you tell me what "coerce" means, please?
19 **Q The definition of the word "coerce" will**
20 **allow to you answer that question?**
21 A I'm trying to understand the question.
22 MR. PIKE: You're using -- for the
23 record, you're using legal terms.
24 "Consent," "coerce." Those are the terms
25 you're utilizing in your question. Mr.

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1 Epstein is simply asking you what those
2 terms mean in order to facilitate a response
3 or a response coupled with the invocations.
4 He doesn't -- he is not a lawyer. He
5 doesn't understand these legal terms, and he
6 is asking you for clarification. If you
7 want to take those legal terms out of your
8 questions and simplify them, then go ahead
9 and do that, but it is fair that he ask what
10 certain words mean.

11 MR. EDWARDS: I absolutely agree and
12 want to make sure before I give him the
13 definition, that this question is being
14 asked because the definition will help him
15 to accurately answer the question, assuming
16 that would be the only reason he would ask
17 me a question.

18 MR. PIKE: As his lawyer, I think that
19 the definition of the word would assist him
20 in understanding the question a little bit
21 better, because, as you know, "coerce" and
22 "consent" have several meanings, whether or
23 not it be in State court, under the Florida
24 State statutes or under federal statutes
25 under 2255. I think that any sort of

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1 response could, you know... tiptoe into the
2 Fifth, Sixth and Fourteenth, and I think Mr.
3 Epstein is attempting to... understand your
4 questions.

5 MR. EDWARDS: I appreciate that. I feel
6 like we're getting closer to an answer than
7 we have received during this entire
8 litigation, so I'm certainly going to help
9 him out here.

10 **Q Mr. Epstein, do you then at least agree**
11 **that you paid Jane Doe money in exchange for**
12 **sexual services when she was under the age of**
13 **18?**

14 MR. PIKE: Form, mischaracterizes the
15 witness's testimony, and move to strike.

16 A Unfortunately I have to answer that
17 question as I've answered most of your other
18 questions here today, Mr. Edwards, which is that
19 my attorneys, at least today, have advised me
20 that I must assert my rights under the Sixth,
21 Fifth and Fourteenth Amendment.

22 **Q Mr. Epstein, how did you, meaning what**
23 **process did you go through, to get Jane Doe to**
24 **exchange your money for her sexual services when**
25 **she was under the age of 18?**

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1 MR. PIKE: Form.

2 A I would like to answer every one of your
3 questions with respect to Jane Doe, Mr. Edwards.
4 However, today, my counsel has instructed me that
5 I must assert my rights under the Sixth, Fifth
6 and Fourteenth Amendment.

7 **Q If you answer that question for me, then**
8 **I can tell you whether that falls under the**
9 **definition of coercing her into prostitution.**

10 A Is that a question?

11 **Q Sure. Can you provide an answer to the**
12 **previous question, so I can categorize that as**
13 **coercion or noncoercion?**

14 MR. PIKE: No, he cannot, because I
15 don't know what question is on the table,
16 and it is as simple as that. I don't know
17 what question is on the table.

18 MR. EDWARDS: Sure.

19 **Q Didn't you interact with Jane Doe in a**
20 **sexual manner when she was under the age of 18?**

21 MR. PIKE: Object to the form. This
22 question has been asked no less than twice
23 during your deposition --

24 MR. EDWARDS: I'll agree with that.

25 MR. PIKE: -- relative to Jane Doe and

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1 I'll object to the form.

2 A I would like to answer all of your
3 questions, Mr. Edwards, especially that
4 question. However, today, my counsel has advised
5 me that I must assert my rights under the Sixth,
6 Fifth and Fourteenth Amendment.

7 **Q Did you persuade, induce or entice Jane**
8 **Doe to engage in prostitution when she was an**
9 **underage minor child?**

10 MR. PIKE: Form.

11 A I would like to answer that question but
12 my counsel has advised me I must respond by
13 invoking my Sixth, Fifth and Fourteenth Amendment
14 right.

15 **Q Can you tell the jury how it is that**
16 **Jane Doe engaged in an act of prostitution with**
17 **you?**

18 MR. PIKE: Form.

19 A On advice of counsel, I'm going to have
20 to invoke my Sixth, Fifth and Fourteenth
21 Amendment right.

22 **Q While you were interacting with Jane Doe**
23 **in a sexual manner when she was 14 and 15 years**
24 **old, did you consider that molestation?**

25 MR. PIKE: Form.

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1 A I would like to answer all of your
2 questions, Mr. Edwards, with respect to Jane Doe
3 and her complaint. However, at least today my
4 counsel has advised me that I must assert my
5 rights under the Sixth, Fifth and Fourteenth
6 Amendment.
7 **Q While, at the same time you were**
8 **molesting Jane Doe, didn't you tell her that you**
9 **liked the way her young body looked?**
10 MR. PIKE: Form.
11 A I would like to respond to all your
12 questions regarding Jane Doe, is the point, Mr.
13 Edwards. However today at least my counsel has
14 advised me I must assert my rights under the
15 Sixth, Fifth and Fourteenth Amendment.
16 THE VIDEOGRAPHER: Counsel.
17 (Indicating five minutes left on tape.)
18 MR. EDWARDS: Okay.
19 **Q Mr. Epstein do you know George Rush?**
20 MR. PIKE: Form -- I'll withdraw the
21 form. I'm sorry. It is not a proper form
22 objection.
23 A I'm sorry, on advice of counsel I have
24 to assert my rights under the Sixth, Fifth and
25 Fourteenth Amendment.

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1 **Q Did you talk to George Rush in the year**
2 **2009 about the allegations of improper sexual**
3 **conduct between you and underage minor children?**
4 MR. PIKE: Can you repeat the question,
5 for me, Madam Court Reporter?
6 MR. EDWARDS: I can ask it again.
7 MR. PIKE: Sure.
8 **Q Did you speak with George Rush in 2009**
9 **specifically about allegations of your**
10 **interaction with underage minor children in a**
11 **sexual manner?**
12 A On advice of counsel, I'm going to have
13 to assert my rights under the Sixth, Fifth and
14 Fourteenth Amendment.
15 **Q Did you know that the conversation**
16 **between you and New York Daily News reporter**
17 **George Rush was recorded?**
18 MR. PIKE: Form.
19 A On advice of counsel, I'm going to have
20 to assert my right under the Sixth, Fifth and
21 Fourteenth Amendment.
22 **Q At the time when you spoke with George**
23 **Rush from The New York Daily News in 2009, did he**
24 **tell you that he was recording your statements to**
25 **him?**

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1 MR. PIKE: One second... Form.
2 A On advice of counsel, I'm going to have
3 to respectfully assert my Sixth, Fifth and
4 Fourteenth Amendment right.
5 **Q During that conversation that you had**
6 **with George Rush from The New York Daily News,**
7 **didn't you express to him that you felt you were**
8 **punished criminally for no reason?**
9 MR. PIKE: Form.
10 A Though I would like to answer all of
11 your questions, Mr. Edwards, my counsel has
12 advised me I must assert my rights under the
13 Sixth, Fifth and Fourteenth Amendment.
14 **Q Didn't you also tell George Rush that a**
15 **more appropriate punishment for your actions with**
16 **these underage minor children would have been a**
17 **100 or \$200 fine?**
18 MR. PIKE: Form.
19 A On advice of counsel I have to assert my
20 rights under the Sixth, Fifth and Fourteenth
21 Amendment.
22 **Q Tell the jury what you feel would be an**
23 **appropriate penalty for you, for the acts that**
24 **you committed against Jane Doe.**
25 MR. PIKE: Form.

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1 A Though I would like to very much answer
2 that question, on advice of my counsel today, Mr.
3 Edwards, I have to invoke my Sixth, Fifth and
4 Fourteenth Amendment right.
5 **Q In your Affirmative Defenses in the**
6 **complaint of Jane Doe versus Jeffrey Epstein,**
7 **which is Jane Doe, affirmative defense number one**
8 **indicates that Jane Doe consented to and was a**
9 **willing participant in the acts alleged.**
10 **What evidence did you have that Jane Doe**
11 **consented to or was a willing participant in the**
12 **acts that were alleged by Jane Doe against you?**
13 MR. PIKE: Form.
14 A Though I would like to describe the
15 evidence that Jane Doe was a willing participant,
16 on advice of counsel today, they've instructed me
17 I must assert my rights under the Sixth, Fifth
18 and Fourteenth Amendment.
19 **Q At that point in time you're at least**
20 **admitting that there was an interaction between**
21 **you and Jane Doe, correct?**
22 MR. PIKE: Form. Move to strike.
23 A On advice of counsel, I'm going to have
24 to assert my rights under the Sixth, Fifth and
25 Fourteenth Amendment.

1 form. I think you need to reword the
 2 question.
 3 MR. EDWARDS: Okay. I'll ask it again.
 4 **Q Is it your position, or do you have**
 5 **facts or information that Jane Doe was molested**
 6 **by a separate or different child molester?**
 7 MR. PIKE: Form.
 8 A I would like to answer all your
 9 questions that you posed here today, Mr. Edwards,
 10 every last one of them. However, at least today
 11 under advice of counsel, I have been instructed I
 12 must assert my rights under the Sixth, Fifth and
 13 Fourteenth Amendment.
 14 **Q The next affirmative defense indicates**
 15 **that Jane Doe impliedly consented to the acts**
 16 **alleged by not objecting.**
 17 **What do you mean by that affirmative**
 18 **defense?**
 19 MR. PIKE: Form.
 20 A I would like it answer all your
 21 questions regarding Jane Doe, and her complaint.
 22 However, today my attorneys have advised me that
 23 I must assert my rights under the Sixth, Fifth
 24 and Fourteenth Amendment.
 25 **Q Do you mean --**

1 **believed or was told that the plaintiff, Jane**
 2 **Doe, had attained the age of 18 years old at the**
 3 **time of the alleged acts." That is a false**
 4 **statement, isn't it, Mr. Epstein?**
 5 MR. PIKE: Form.
 6 A I would like to answer every question
 7 you posed today, Mr. Edwards, about Jane Doe and
 8 her complaint. However, at least today my
 9 attorneys have advised me I must assert my rights
 10 under the Sixth, Fifth and Fourteenth Amendment.
 11 **Q What gave you the reasonable belief that**
 12 **Jane Doe was 18 years of age or older when you**
 13 **touched her in a sexual manner?**
 14 MR. PIKE: Form.
 15 A I would like to answer all of your
 16 questions with respect to Jane Doe, Mr. Edwards,
 17 every one of them. However, today, as you're
 18 aware, my counsel has advised me I must assert my
 19 rights under the Sixth, Fifth and Fourteenth
 20 Amendment.
 21 **Q Didn't Jane Doe tell you when you asked**
 22 **her age that she was 15 years old?**
 23 MR. PIKE: Form.
 24 A I would like to answer that question
 25 because I've answered most of your other

1 MR. PIKE: May also call for work
 2 product information. Sorry.
 3 **Q Do you mean that, for instance, when you**
 4 **would insert your fingers into her vagina when**
 5 **she was 14 or 15 years old, that because she**
 6 **didn't object that she impliedly consented to**
 7 **that conduct?**
 8 MR. PIKE: Form.
 9 A What's the question?
 10 **Q Do you mean by -- I'll read your**
 11 **affirmative defense that you have stated.**
 12 **"Plaintiff Jane Doe impliedly consented**
 13 **to the acts alleged by not objecting," and I'm**
 14 **asking: By that, do you mean that when you**
 15 **inserted your fingers into her vagina when she**
 16 **was age 14 or 15, that by her not verbally**
 17 **objecting, then in your mind she consented?**
 18 MR. PIKE: Form.
 19 A I would like to answer all your
 20 questions Mr. Edwards. However, at least today,
 21 at least today, my counsel instructed me I must
 22 assert my rights under the Sixth, Fifth and
 23 Fourteenth Amendment.
 24 **Q Your next affirmative defense states**
 25 **that "Defendant," that being you, "reasonably**

1 questions here today. Unfortunately my counsel
 2 here today said I must invoke my rights under the
 3 Sixth, Fifth and Fourteenth Amendment.
 4 **Q The second portion of that affirmative**
 5 **defense is that you reasonably believed or you**
 6 **were told that Jane Doe attained the age of 18.**
 7 **Tell the jury, who told you that Jane**
 8 **Doe had attained the age of 18 years old when you**
 9 **engaged in sexual conduct with her?**
 10 MR. PIKE: Form.
 11 A Though I would like very much to answer
 12 that question, as most of your other questions
 13 here today, as you're aware my counsel has
 14 advised me I must assert my rights under the
 15 Sixth, Fifth and Fourteenth Amendment.
 16 **Q In fact, if you learned that she had**
 17 **attained the age of 18 years old, you would not**
 18 **have engaged in sexual conduct with her, would**
 19 **you?**
 20 MR. PIKE: Form.
 21 A I would like to answer all of your
 22 questions with respect to Jane Doe, Mr. Edwards.
 23 However, at least today, my counsel advised me
 24 that I must assert my rights under the Sixth,
 25 Fifth and Fourteenth Amendment.

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1 **Q** In fact, there were several times when
2 girls were brought to you by other underage minor
3 females and these girls were over the age of 18
4 and you turned them away, as being too old for
5 you; isn't that true?
6 MR. PIKE: Form.
7 A Again, I would like to answer all your
8 questions here today. I would like to answer
9 that question. However, my counsel has advised
10 me that at least today I may not and must assert
11 my rights under the Sixth, Fifth and Fourteenth
12 Amendment.
13 **Q** In fact, your target age group for
14 sexual activity is between 12 and 17 years old;
15 is that true?
16 MR. PIKE: Form.
17 A Mr. Edwards, I would like to answer that
18 question, as well as your other questions here
19 today. However, my counsel has advised me that I
20 must not, may not, must assert my rights under
21 the Sixth, Fifth and Fourteenth Amendment.
22 **Q** You know a person named V.R., don't
23 you?
24 A Though I would like to answer all of
25 your questions Mr. Edwards, on advice of counsel

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1 today at least, they've instructed me that I must
2 respond by asserting my rights under the Sixth,
3 Fifth and Fourteenth Amendment.
4 **Q** V.R. is somebody who served as your sex
5 slave when she was between the ages of 15 and 18
6 years old; isn't that true?
7 MR. PIKE: Form.
8 A I would like to respond to all of your
9 questions with respect to V.R. However, on
10 advice of counsel today at least, they've
11 instructed me that I must assert my rights under
12 the Sixth, Fifth and Fourteenth Amendment.
13 **Q** Do you know Emmy Taylor?
14 A Though I would like to respond to all of
15 your questions here today, Mr. Edwards, under
16 advice of counsel I must assert my rights under
17 the Sixth, Fifth and Fourteenth Amendment.
18 **Q** Is that somebody who served as the sex
19 slave for Gislaine Maxwell at the same time or
20 about the same time that V.R. was your sex slave?
21 MR. PIKE: Form.
22 A I would like to answer all of your
23 questions, Mr. Edwards. However today my counsel
24 has advised me I must assert my rights under the
25 Sixth, Fifth and Fourteenth Amendment.

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1 **Q** Isn't it true during that period of time
2 when V.R. was your underage sex slave, that she
3 observed you to have sexual intercourse and
4 sexual activity with several females, as young as
5 12 years old?
6 MR. PIKE: Form.
7 A I would like to respond to all of these
8 questions. And I prefer that your partner, Scott
9 Rothstein, who currently sits in jail for
10 fabricating cases of a sexual nature against
11 people like me and others, were here to hear some
12 of these answers. However, with respect to any
13 other question, at least today, my counsel has
14 advised me that I must assert my rights under the
15 Sixth, Fifth and Fourteenth Amendment.
16 **Q** Why would you prefer that Scott
17 Rothstein hear an answer from you about whether
18 or not you had sex with multiple 12 year olds?
19 MR. PIKE: Form. Move to strike, and
20 mischaracterizes the witness's testimony.
21 A At least today, Mr. Edwards, my counsel
22 has advised me that I must respond to these
23 questions by asserting my rights under the Sixth,
24 Fifth and Fourteenth Amendment.
25 **Q** V.R. is somebody who has filed a lawsuit

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1 against you under the pseudonym Jane Doe number
2 102; isn't that correct?
3 MR. PIKE: I'm sorry. Can you repeat
4 it?
5 MR. EDWARDS: Sure.
6 **Q** V.R. is somebody that filed a lawsuit
7 against you under the pseudonym Jane Doe number
8 102?
9 A Though I would like to respond to your
10 questions today, Mr. Edwards, with respect to
11 these lawsuits, my counsel has advised me that I
12 may not, and must assert my rights under the
13 Sixth, Fifth and Fourteenth Amendment.
14 **Q** In that complaint, the allegation is
15 made that a friend of Jeffrey Epstein sent him
16 three 12-year old girls from France, who spoke no
17 English, for defendant Epstein to sexually
18 exploit and abuse. After doing so, they were
19 sent back to France the next day.
20 That's a true statement, isn't it?
21 MR. PIKE: Form.
22 A I would like to respond to all of these
23 questions... However, at least today, my counsel
24 has advised me that I must assert my rights under
25 the Sixth, Fifth and Fourteenth Amendment.

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1 **Q In the complaint filed on behalf of Jane**
2 **Doe number 102 also known as V.R., was filed by**
3 **an attorney named Bob Josefsberg with Podhurst,**
4 **Orseck; isn't that right?**
5 MR. PIKE: Can you reread that specific
6 question for me?
7 THE COURT REPORTER: Sure.
8 (The record was read.)
9 MR. PIKE: To the extent you know the
10 answer to that question, you can answer.
11 A I think -- I'm going to assert my rights
12 under the Sixth, Fifth and Fourteenth Amendment.
13 **Q And when I asked you a few questions**
14 **back about your sexual interaction and**
15 **intercourse with 12-year old girls and derived**
16 **that from this complaint, your answer -- into**
17 **your answer was injected some response related to**
18 **Scott Rothstein, and so my question is, what do**
19 **you believe, if anything, Scott Rothstein had to**
20 **do with the complaints or assertions that are**
21 **made in the Jane Doe 102 versus Epstein**
22 **complaint?**
23 MR. PIKE: Form, move to strike.
24 Mischaracterizes the witness's testimony.
25 A I would like to answer that question.

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1 However, at least today they have instructed me I
2 must respond to that question by asserting my
3 Sixth, Fifth and Fourteenth Amendment right.
4 **Q Mr. Epstein, for at least the passed**
5 **decade you have consistently kept at least one**
6 **sex slave at all times. Is that true?**
7 MR. PIKE: Form.
8 A I would like to respond to these
9 sexually charged questions. However, upon advice
10 of counsel, I must respond simply by asserting my
11 Sixth Amendment, Fifth Amendment and Fourteenth
12 Amendment right.
13 **Q And you have an Amazon.com account,**
14 **right?**
15 MR. PIKE: Form.
16 A Upon advice of counsel, I'm going to
17 have to assert my right to the Sixth Amendment,
18 Fifth Amendment and Fourteenth Amendment.
19 **Q On or about September 4, 2005 you**
20 **ordered and received -- and later received three**
21 **books from Amazon.com; is that true?**
22 MR. PIKE: Form. Um... Books?
23 ... Form.
24 A On advice of counsel I have to assert my
25 Sixth Amendment, Fifth Amendment and Fourteenth

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1 Amendment right.
2 MR. EDWARDS: Mark this.
3 (Order form from Amazon.com, listing
4 three books, was marked as Plaintiff's
5 Exhibit number 9 for identification, as of
6 this date.)
7 MR. PIKE: (Handing to the witness.)
8 **Q Do you recognize that document that's**
9 **been marked for identification purposes as**
10 **Exhibit 9?**
11 A No. I do not.
12 **Q Did you indeed order the three books**
13 **from Amazon.com that are listed on that order**
14 **form that's been marked as Exhibit 9?**
15 A No.
16 **Q Have you read the three books that are**
17 **on that order form, Exhibit number 9?**
18 A No.
19 **Q Do you know why it is, can you explain**
20 **how that document came to exist?**
21 A No.
22 **Q Do you know where that document that**
23 **you're holding marked as Exhibit number 9 came**
24 **from?**
25 A No.

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1 **Q Would you be surprised if it was taken**
2 **from your trash by police or law enforcement?**
3 A Would I be surprised? I don't
4 understand the question.
5 **Q Would it surprise you if the police**
6 **pulled that from your trash, outside your house,**
7 **in 2005?**
8 MR. PIKE: Object to the form. There,
9 because... quite frankly, I don't know where
10 this document came from. There has been no
11 predicate laid as to its origination. Now
12 you're talking about a question relative to,
13 would it surprise you if the police pulled
14 it... I don't think that you've laid the
15 proper foundation, so I'm going to object to
16 the form.
17 MR. EDWARDS: Okay. At trial I'll enter
18 it in through another witness. I just want
19 him to deny him ever seeing it before I do
20 that. It is fine, I'll lay the predicate --
21 MR. PIKE: He's already said that, I
22 believe, he's never -- you asked him if he
23 recognized the document and he said "No."
24 MR. EDWARDS: I appreciate that.
25 **Q Would it surprise you if that was**

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1 obtained from a trash pull at your house?
2 A You're asking me a hypothetical
3 question. I have no idea.
4 Q What is the name and address of the
5 purported purchaser of those books? According to
6 Exhibit number 9?
7 A I don't know.
8 MR. PIKE: Form.
9 Q Looking at that document you cannot tell
10 what address those books were shipped to?
11 A It says "billing address."
12 Q What's the billing address?
13 A It says what the document says.
14 Q What is that?
15 A It says Jeffrey Epstein.
16 Q What's the address?
17 A 358 El Brillo Way.
18 Q That address at 358 El Brillo Way is
19 your address, correct?
20 MR. PIKE: Form.
21 A On advice of counsel, I'm going to have
22 to assert my Fifth Amendment, Sixth Amendment and
23 Fourteenth Amendment right.
24 Q Jeffrey Epstein, that's your name,
25 correct?

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1 A Correct.
2 Q Can I see the document?
3 A (Handing to counsel.)
4 Q Mr. Epstein, the person whose deposition
5 was taken yesterday and has been widely reported
6 in the newspapers as your sex slave, [REDACTED]
7 [REDACTED] is she indeed your sex slave?
8 MR. PIKE: Form.
9 A On advice of counsel, I'm going to
10 respond by asserting my Sixth Amendment, Fifth
11 Amendment and Fourteenth Amendment right.
12 Q Does anybody other than yourself have
13 access to your Amazon.com account?
14 MR. PIKE: Form.
15 A I don't know.
16 Q You have never read "Slave Craft,
17 Roadmaps for Erotic Servitude, Principles, Skills
18 and Tools"?
19 MR. PIKE: Asked and answered. He was
20 already asked these questions -- I'm sorry,
21 answered.
22 A I've answered the question "No."
23 Q Why was it ordered to your house, the
24 shipping address and billing address both being
25 358 El Brillo Way?

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1 A I don't know.
2 Q Is there anybody else that lives in your
3 house, besides yourself, that has sex slaves?
4 MR. PIKE: I'm sorry... Mr. Horowitz, I
5 believe, interrupted you, I think he gave
6 you another exhibit, I think it's Exhibit 9,
7 which I think he wants you to follow up with
8 a question.
9 MR. EDWARDS: It is just placed on the
10 table. I'm waiting for an answer.
11 MR. PIKE: I'm not being smarter. I'm
12 just saying, are you going to follow through
13 with the question that's currently on the
14 table or the one that --
15 MR. EDWARDS: I asked a question and
16 many waiting for an answer.
17 MR. PIKE: Seriously, I'm not trying to
18 be rude or smart. You put an exhibit in
19 front of him and --
20 MR. HOROWITZ: I wanted to give the
21 court reporter the exhibits. She gets the
22 exhibits.
23 MR. PIKE: I've got to know what
24 question is on the table, that's all.
25 MR. HOROWITZ: I didn't interrupt you,

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1 did I?
2 MR. EDWARDS: No, it is asked on -- I
3 asked a question, it is still on the table.
4 A Ask the question.
5 Q Anybody else in your house have sex
6 slaves?
7 MR. PIKE: Form.
8 A I have to respond to that question as I
9 did to most of your other questions today, which
10 is I have to assert my rights to the Sixth, Fifth
11 and Fourteenth Amendment.
12 Q Are you familiar with the various
13 messages that are -- that were taken from your
14 home at 358 El Brillo Way?
15 MR. PIKE: Form.
16 A I'm going to have to assert my rights
17 under the Sixth, Fifth and Fourteenth Amendment.
18 Q Have you read the messages that were
19 taken and placed in the State Attorney's Office
20 file related to the criminal charges against
21 you?
22 MR. PIKE: Form.
23 A I don't recall.
24 Q Why is it that underage minor females
25 were calling your home in 2004 and 2005 for, in

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1 quotes, "work"?

2 MR. PIKE: Wait a second. Form, lacks

3 predicate, foundation, and for the record,

4 you're referring to a stack of documents

5 that have not been marked --

6 MR. EDWARDS: Not referring to anything,

7 just so that your objection is clear.

8 MR. PIKE: You're referring to what I

9 see as a stack of documents that look like

10 message pads. You're clarifying and...

11 making a prelude into your question as to

12 why were underage girls calling your home

13 for work?

14 MR. EDWARDS: Right.

15 MR. PIKE: You're not allowing the

16 witness to see the exhibits to which you

17 refer, and I think it is an improper

18 question and lacks predicate and

19 foundation.

20 MR. EDWARDS: No matter what I show the

21 witness, any answer he gives is going to

22 incriminate him, so he is going to invoke

23 his Fifth Amendment rights, which is why

24 right now, he is not going to see these. At

25 trial he will see all of these things.

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1 MR. PIKE: I'm glad you said that. I

2 think that's a false statement. I move to

3 strike it. Mr. Edwards, you provided a

4 document to Mr. Epstein not two minutes ago

5 and he answered questions without invoking

6 the Fifth Amendment right.

7 MR. EDWARDS: And it incriminated him.

8 MR. PIKE: If the Fifth Amendment comes

9 into play.

10 MR. EDWARDS: It should have.

11 MR. PIKE: Thank you. If the Fifth

12 Amendment comes into play, he will invoke

13 the Fifth. He does not know certain

14 information. Not knowing something, my

15 friend, is not a waiver. Follow? So he is

16 trying to --

17 MR. EDWARDS: It is --

18 MR. PIKE: -- trying to actually work

19 with you on your questions. Maybe if you

20 show him what you're talking about, he can

21 answer your question.

22 **Q Why were underage minor females calling**

23 **your house to, quote, unquote, "work"?**

24 MR. PIKE: Form.

25 A Unfortunately, I have to answer that

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1 question, as I've answered most of your other

2 questions here today, Mr. Edwards, which is that

3 my attorneys advised me to assert my Sixth

4 Amendment, Fifth Amendment and Fourteenth

5 Amendment right.

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

7 [REDACTED]?

8 A As I've answered most of your other

9 questions here today, I'm going to have to

10 respond that my attorneys have instructed me to

11 assert my rights to the Sixth, Fifth and

12 Fourteenth Amendment.

13 **Q That's somebody who is listed in the**

14 **agreement between yourself and the United States**

15 **of America as a co-conspirator of yours. Does**

16 **that help refresh your recollection as to who Ms.**

17 **[REDACTED] is?**

18 MR. PIKE: Form.

19 A I'm going to have to respond by

20 asserting my rights to the Sixth, Fifth and

21 Fourteenth Amendment.

22 **Q Do you remember receiving messages from**

23 **Adriana that would read something like, "I left a**

24 **message for [REDACTED] to confirm for 11:00 o'clock**

25 **and [REDACTED] for 4:30," many messages like that?**

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1 MR. PIKE: I'm sorry, but before he

2 answers, I'm just curious, you're again

3 referring to a stack of documents that's

4 about an inch thick. Do you want to mark

5 anything as an exhibit?

6 MR. EDWARDS: No, I really don't, Mike,

7 but appreciate all the help you're

8 providing. Thanks.

9 MR. PIKE: Yeah. You're welcome. Do

10 you know where these documents came from?

11 MR. EDWARDS: Yes.

12 MR. PIKE: Where did you obtain that

13 them from?

14 MR. EDWARDS: It is not my deposition.

15 You had that chance already.

16 MR. PIKE: No, I asked the right -- no,

17 that's not really part of my case over

18 there. Critton took your deposition, not

19 me. That's a case separate and distinct

20 from these cases, so my question to you is:

21 I'm just curious, you have a stack of

22 documents, I think you said earlier they

23 came from the State Attorney's Office file?

24 MR. EDWARDS: It is not my deposition.

25 I'm asking questions. Your client is going

1 to give answers or not give answers.
 2 MR. PIKE: Okay.
 3 MR. EDWARDS: These will come in with
 4 the appropriate person at trial, period.
 5 MR. PIKE: Okay.
 6 A Question? Sorry.
 7 Q Sure.
 8 Do you remember receiving a message from
 9 [REDACTED], such as, "I
 10 left message for [REDACTED] to confirm for 11:00
 11 o'clock and [REDACTED] for 4:30"?
 12 A I don't recall.
 13 Q And when a message such as that is left,
 14 is that indicating [REDACTED] is going to come to
 15 your house for you to molest her at 11:00 and
 16 [REDACTED] will come for you to molest her at 4:30?
 17 MR. PIKE: Form.
 18 A I'm going to have to respond by
 19 asserting my rights under the Sixth, Fifth and
 20 Fourteenth Amendment.
 21 Q Why would underage minor females call
 22 your home and leave messages like, "I have a girl
 23 for him." Do you know?
 24 MR. PIKE: Form.
 25 A On advice of my counsel, today at least,

1 they've advised me I must assert my right under
 2 the Sixth, Fifth and Fourteenth Amendment.
 3 Q Did you ever employ any underage minor
 4 females for any legitimate purpose at your home,
 5 358 El Brillo Way?
 6 MR. PIKE: Form.
 7 A At least today, Mr. Edwards, though I
 8 would like to answer every one of your...
 9 questions, my counsel has advised me I must
 10 assert my rights under the Sixth, Fifth and
 11 Fourteenth Amendment.
 12 Q Isn't it true, Mr. Epstein, that each
 13 underage minor female that contacted -- that
 14 called your home or was called from your home,
 15 was called for the purposes of coming to your
 16 house to satisfy you sexually?
 17 MR. PIKE: Form.
 18 THE WITNESS: I think I've answered that
 19 question before.
 20 A I will answer it unfortunately the same
 21 way, which is although I would like to answer
 22 each and every one of the questions you've posed
 23 here today, on advice of my counsel they've
 24 instructed me I must assert my rights under the
 25 Sixth, Fifth and Fourteenth Amendment.

1 Q In a newspaper article dated October 30,
 2 2006 entitled, "The Return Of A," in quotes,
 3 'Very Passionate' end quote, "Jeffrey Epstein,"
 4 there is a quote from somebody that is called in
 5 this article "A Friend," and the quote is:
 6 "Speaking about Jeffrey Epstein, his life is
 7 about making money and living an erotic life and
 8 his escape isn't alcohol or drugs, it is sex."
 9 Is that a true statement?
 10 MR. PIKE: Form.
 11 A Is it a true statement that that's what
 12 the article says?
 13 Q No, is it a true statement that your
 14 life is about making money and living an erotic
 15 life and your escape is not alcohol or drugs, it
 16 is sex?
 17 MR. PIKE: Form.
 18 A Though I would like to answer that
 19 question, as well as all your other questions
 20 posed here today, Mr. Edwards, on advice of my
 21 counsel, he has instructed me I must assert my
 22 rights under the Sixth, Fifth and Fourteenth
 23 Amendment.
 24 Q Another article entitled "The
 25 Fanaticist," from New York Magazine dated

1 December 10, 2007, a quote or several quotes are
 2 attributed to you, and it reads: "I told
 3 Epstein," this is the author "and Rubenstein the
 4 sort of story New York Magazine wanted to do, and
 5 Epstein seemed to find ironic delight in every
 6 word. A secretive genius, I said," a statement
 7 from the author. "She indicates you corrected
 8 her saying "Not secretive, private," and the next
 9 quote, which I will ask you about, is that you
 10 stated "And if I was a genius, I wouldn't be
 11 sitting here, a guy with sex issues;" do you
 12 remember saying that?
 13 MR. PIKE: Form.
 14 Q -- to a reporter in New York?
 15 MR. PIKE: Form. Move to strike.
 16 A Though I would like to answer every
 17 question you've posed here today, Mr. Edwards, on
 18 advice of counsel I have to assert my Sixth
 19 Amendment, Fifth Amendment and Fourteenth
 20 Amendment right.
 21 MR. PIKE: Mr. Edwards, if you would, I
 22 know you --
 23 THE WITNESS: Take a break?
 24 MR. PIKE: Actually one second.
 25 You provided the title of the second

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1 article that you just questioned him. Could
2 you please, for the record, provide the
3 title to the first article.
4 MR. EDWARDS: I did.
5 MR. PIKE: I didn't hear it.
6 MR. EDWARDS: I will do it again. "A
7 Return Of A 'Very Passionate' Jeffrey
8 Epstein."
9 MR. PIKE: Thank you.
10 MR. EDWARDS: "Very passionate" is in
11 quotes, as I said the first time.
12 MR. PIKE: Thank you.
13 THE VIDEOGRAPHER: Going off the video
14 record 3:02 p.m.
15 (Pause in the proceedings.)
16 THE VIDEOGRAPHER: Back on the video
17 record at 3:15 p.m.
18 **Q In the same article, "The Fanaticist,"**
19 **there is a quote by "Michael Wolff." Do you know**
20 **Michael Wolff, the columnist?**
21 A I have to respond the same way I've
22 responded to most of your questions here today,
23 which is, I must assert my rights under the
24 Sixth, Fifth and Fourteenth Amendment.
25 **Q Mr. Wolff says in a quote in this**

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1 article, "He has never," speaking about Mr.
2 Epstein, "been secretive about the girls. At one
3 point when his troubles began he was talking to
4 me and said, 'What can I say? I like young
5 girls.'" Is that a comment or statement that you
6 made to Michael Wolff?
7 MR. PIKE: Form.
8 A Unfortunately I have to respond to that
9 question as I did to most of your questions
10 today, which is I must assert my rights under
11 advice of counsel, under the Sixth, Fifth and
12 Fourteenth Amendment.
13 **Q On several occasions your attorney or**
14 **one of your attorneys, Jack Goldberger, has made**
15 **the statement "Jeffrey Epstein has never denied**
16 **that the girls came to the house." Are you**
17 **admitting that the girls that are now plaintiffs,**
18 **at least came to your house?**
19 MR. PIKE: Form.
20 A I would like to answer that question
21 you've just quoted an attorney's statement?
22 **Q Right, Jack Goldberger's statement.**
23 A So what's the question?
24 MR. PIKE: You can't -- hold on right
25 there. This is ridiculous. This is getting

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1 to be ridiculous. You can't read --
2 MR. EDWARDS: What --
3 MR. PIKE: You can't read someone else's
4 quote and say "Are you admitting something
5 from someone else's quote." He didn't make
6 the quote, so how can it be an admission,
7 despite who it is.
8 MR. HOROWITZ: That's a form objection.
9 MR. PIKE: You're right, form.
10 **Q Your attorney, Jack Goldberger, made the**
11 **statement, "Jeffrey Epstein never denied the**
12 **girls came to the house." This was related to**
13 **the criminal investigation of you.**
14 **Do you admit that the girls,**
15 **specifically Jane Doe, came to your house?**
16 A Mr. Edwards, I would like to respond to
17 that question as I responded to most of the other
18 questions today, but unfortunately my counsel has
19 advised me I must assert my rights under the
20 Sixth, Fifth and Fourteenth Amendment.
21 **Q Mr. Epstein, can you tell the jury who**
22 **██████████s?**
23 MR. PIKE: Form.
24 A Unfortunately, Mr. Edwards, I have to
25 respond to that question as I responded to most

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1 of your other questions today, because on advice
2 of counsel they've instructed me to assert my
3 rights under the Sixth, Fifth and Fourteenth
4 Amendment.
5 **Q You're aware that she is somebody listed**
6 **as a co-conspirator of yours related to your**
7 **criminal activity in the Nonprosecution**
8 **Agreement, correct?**
9 MR. PIKE: Form.
10 A With respect to that question as most of
11 your other questions here today, on advice of
12 counsel I have been instructed to assert my
13 rights under the Sixth, Fifth and Fourteenth
14 Amendment.
15 **Q Isn't it true that you paid her to have**
16 **underage minor females brought to your house, at**
17 **specific times, as you directed?**
18 MR. PIKE: Form, asked and answered.
19 A As I've answered most of your questions
20 here today, unfortunately my counsel has advised
21 me that I must assert my rights under the Sixth,
22 Fifth and Fourteenth Amendment.
23 **Q Another co-conspirator of yours, as she**
24 **is labeled in the Nonprosecution Agreement, is**
25 **Lesley Groff. What role did she play or what did**

1 **she conspire with you to do?**
 2 MR. PIKE: Form.
 3 A Mr. Edwards, I have to respond to that
 4 question as I did to most of your other questions
 5 here today, which is, on advice of counsel,
 6 they've instructed me to assert my rights under
 7 the Sixth, Fifth and Fourteenth Amendment.
 8 **Q Today what role does Story Cowles play**
 9 **in your life?**
 10 MR. PIKE: Form.
 11 A I would like to answer all your
 12 questions, Mr. Edwards. However, at least today,
 13 my counsel has advised me that I must assert my
 14 rights under the Sixth, Fifth and Fourteenth
 15 Amendment.
 16 **Q Is Story Cowles your personal**
 17 **assistant?**
 18 MR. PIKE: Form.
 19 A Mr. Edwards, I would like to answer all
 20 your questions here today. However, upon advice
 21 of counsel, they've instructed me that I must
 22 assert my Fifth, Sixth and Fourteenth Amendment
 23 rights to that question.
 24 **Q And Story Cowles, in addition to being**
 25 **your personal assistant, is [REDACTED]**

1 **underage minor females in the communities**
 2 **surrounding each of your homes?**
 3 MR. PIKE: Form.
 4 A Though I would like to answer each and
 5 every one of your questions, Mr. Edwards, my
 6 attorneys have advised me at least today, at
 7 least today, that I may not. I must assert my
 8 rights as provided by the Sixth, Fifth and
 9 Fourteenth Amendment.
 10 **Q Isn't it true that within that computer**
 11 **system were the names and telephone numbers of**
 12 **hundreds of underage minor females that you**
 13 **sexually molested?**
 14 MR. PIKE: Form.
 15 A I would like to answer every one of your
 16 questions today, Mr. Edwards. However, upon
 17 advice of counsel I must assert my rights as
 18 protected by the Sixth, Fifth and Fourteenth
 19 Amendment.
 20 **Q Can you explain to the jury what**
 21 **Gislaine Maxwell's role was in helping you to**
 22 **access underage minors?**
 23 MR. PIKE: Form, assumes facts not in
 24 evidence.
 25 A You know I would like to answer each and

1 **boyfriend; is that true?**
 2 MR. PIKE: Form.
 3 A Though I would like to answer all your
 4 questions, Mr. Edwards, on advice of counsel
 5 they've instructed me that I must assert my
 6 rights under the Sixth, Fifth and Fourteenth
 7 Amendment.
 8 **Q Prior to the police executing, the Palm**
 9 **Beach police executing a search warrant on your**
 10 **house in October of 2005, did you direct [REDACTED]**
 11 **[REDACTED] to remove at least three computers from**
 12 **your home?**
 13 MR. PIKE: Form.
 14 A Though I would like to answer all your
 15 questions, Mr. Edwards, my attorneys at least
 16 today have advised me I must assert my rights
 17 under the Sixth, Fifth and Fourteenth Amendment.
 18 **Q Where are those computers today?**
 19 MR. PIKE: Form.
 20 A Though I would like to answer all your
 21 questions, my attorneys have advised me I must
 22 assert my rights under the Sixth, Fifth and
 23 Fourteenth Amendment.
 24 **Q Isn't it true that those computers**
 25 **contain the names and telephone numbers of**

1 every one of your questions posed here today, Mr.
 2 Edwards. Unfortunately I have to answer that
 3 question on advice of counsel by invoking my
 4 rights under the Sixth, Fifth and Fourteenth
 5 Amendment.
 6 **Q Do you have any remorse for sexually**
 7 **molesting Jane Doe?**
 8 MR. PIKE: Form, argumentative.
 9 A I would like to answer every one of your
 10 questions regarding Jane Doe. However, at least
 11 today, my counsel has instructed me to assert my
 12 rights as protected by the Sixth, Fifth and
 13 Fourteenth Amendment.
 14 **Q When is the last time that you visited**
 15 **your island, Little St. James?**
 16 MR. PIKE: Form.
 17 A Though I would like to answer all your
 18 questions, Mr. Edwards, my counsel advised me I
 19 must assert my rights as protected by the Sixth,
 20 Fifth and Fourteenth Amendment.
 21 **Q Has any court given you permission to go**
 22 **to your island or the Virgin Islands while you**
 23 **have been on house arrest?**
 24 MR. PIKE: Form.
 25 A Mr. Edwards, though I would like to

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1 answer all your questions, my counsel has advised
2 me that I must assert my rights protected by the
3 Sixth, Fifth and Fourteenth Amendment.
4 **Q Have you interacted sexually with**
5 **underage minors since beginning your house arrest**
6 **or community control?**
7 MR. PIKE: Form.
8 A Though I would like to answer each and
9 every one of your questions posed here today, my
10 counsel has advised me that I must assert my
11 rights protected by the Sixth, Fifth and
12 Fourteenth Amendment.
13 **Q Mr. Epstein, is it your intention to**
14 **testify in the trial of Jane Doe versus Jeffrey**
15 **Epstein?**
16 MR. PIKE: Object to the form. It may
17 disclose attorney/client work product
18 information. I instruct him not to answer.
19 **Q Does Story Cowles work for you at**
20 **Florida Science Foundation?**
21 MR. PIKE: Form.
22 A Though I would like to answer each and
23 every one of your questions, Mr. Edwards, at
24 least today my counsel has advised me I must
25 assert my rights as protected by the Sixth, Fifth

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1 and Fourteenth Amendment.
2 **Q Is it your intent in the future to**
3 **engage in sexual activity with underage minor**
4 **children?**
5 MR. PIKE: Form.
6 A I would like to answer each one of those
7 questions, Mr. Edwards. However, today my
8 counsel has advised me I must assert my rights
9 protected by the Sixth, Fifth and Fourteenth
10 Amendment.
11 **Q When you give that answer, that you**
12 **would like to respond to each one of my**
13 **questions, would it then be your preference to**
14 **explain to the jury why it is that you feel**
15 **entitled to sexually molest underage minor**
16 **children?**
17 MR. PIKE: Form, move to strike.
18 Mischaracterizes the witness's testimony.
19 A Unfortunately I would like to answer
20 that question as well, but my counsel has advised
21 me that I must assert my rights as protected by
22 the Sixth, Fifth and Fourteenth Amendment.
23 MR. EDWARDS: I don't have anything
24 further.
25 MR. PIKE: Ms. Ezell?

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1 MS. EZELL: Okay. I can begin. Are we
2 ending at 4:00?
3 MR. PIKE: Yes, we are ending at 4:00.
4 CROSS EXAMINATION
5 BY MS. EZELL:
6 MS. EZELL: Let the record reflect that
7 I have 3:22 right now.
8 **Q Mr. Epstein, good afternoon.**
9 A Good afternoon.
10 **Q You were previously deposed by Mr.**
11 **Horowitz on Monday, March 8th of this year. You**
12 **were asked with respect to Jane Doe 103, "Do you**
13 **acknowledge that she's been to your home?" There**
14 **was a form objection and your answer was, "Again**
15 **I would like to answer most of your questions.**
16 **However, today as I've answered most, almost all**
17 **of your questions and will continue to answer on**
18 **advice of counsel, I believe, this question, I**
19 **have to assert my Fifth Amendment, Fourteenth**
20 **Amendment and Sixth Amendment rights under the**
21 **U.S. Constitution."**
22 **If you were asked the same question**
23 **today, what would your answer be? That question**
24 **was: "Do you acknowledge that Jane Doe 103 has**
25 **been to your home"?**

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1 A Please tell me who Jane Doe 103 is.
2 **Q Jane Doe 103 is Jane Doe 103.**
3 A I would like to answer the question so
4 the answer would be the same.
5 MR. PIKE: By "answering that question,"
6 you're invoking Fifth, Sixth and
7 Fourteenth?
8 THE WITNESS: Yes.
9 MR. PIKE: Please do so.
10 A I'm invoking my Sixth Amendment, Fifth
11 Amendment and Fourteenth Amendment right.
12 **Q You were then asked "Do you acknowledge**
13 **that Jane Doe 103 came to your home for sexual**
14 **contact during her childhood and that you paid**
15 **her for those services?"**
16 **Mr. Pike said "Form, predicate,**
17 **foundation, argumentative," and your response was**
18 **"I would like to answer that question. I think**
19 **those questions will all have obvious answers,**
20 **and not -- however, today I'm going to have to**
21 **assert my Fifth Amendment, Sixth Amendment and**
22 **Fourteenth Amendment rights under the U.S.**
23 **Constitution, because I would like to answer that**
24 **question, my attorneys have advised me that I**
25 **cannot today, cannot answer any question that may**

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1 be relevant to this lawsuit."
2 If you were asked that same question
3 today, would your answer be the same?
4 MR. PIKE: I'm going to object. Form,
5 and I instruct you if your answer is the
6 same, please tell Ms. Ezell that.
7 A My answer is the same, invoking my right
8 under the Sixth, Fifth and Fourteenth Amendment.
9 Q So, it wasn't just that that day you
10 were instructed not to answer the question, but
11 here, five weeks later, today, you also, today,
12 can't answer those questions, correct?
13 MR. PIKE: Asked and answered.
14 A I'm going to, on advice of counsel, Ms.
15 Ezell, respectfully assert my rights as protected
16 by the Sixth, Fifth and Fourteenth Amendment.
17 Q Later Mr. Horowitz said, "Sir, are you
18 asserting your Sixth, Fifth and Fourteenth
19 Amendment privileges because you're innocent? Is
20 that what you're telling us?"
21 You said "Today on advice of counsel I
22 cannot answer your questions, any of your
23 questions that may be relevant to this lawsuit."
24 MR. PIKE: Form.
25 Q What would your answer be today to that

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1 question?
2 MR. PIKE: Same objection.
3 A On advice of counsel, with respect to
4 that question, I'm going to have to assert my
5 rights as protected by the Sixth, Fifth and
6 Fourteenth Amendment.
7 Q So again, your answer wasn't just that
8 answer then, five weeks ago, but today, you again
9 cannot answer on advice of counsel, correct?
10 MR. PIKE: Move to strike.
11 Mischaracterization. Plaintiff has
12 invoked -- sorry, defendant has invoked
13 Fifth, Sixth and Fourteenth. That's his
14 answer.
15 MS. EZELL: So he invokes them today, as
16 well?
17 MR. PIKE: Yes, ma'am.
18 Q Mr. Horowitz asked "Between 2005 and
19 2006, did your sexual interests include digitally
20 penetrating the vaginas of girls between the ages
21 of 12 and 17?"
22 Mr. Pike objected "Form," and you said,
23 "I find these questions -- I would like to
24 answer every one of those questions. However, my
25 counsel has told me I may not today. I wish I

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1 could answer those questions."
2 can you answer that question today?
3 MR. PIKE: Form.
4 A Ma'am, unfortunately I'm going to have
5 to invoke my Sixth Amendment, Fifth and
6 Fourteenth Amendment right to that question.
7 Q Then you were asked --
8 THE WITNESS: Can we go off the record
9 for a second?
10 THE VIDEOGRAPHER: Off the video record
11 3:32 p.m.
12 THE WITNESS: Just two minutes.
13 MR. EDWARDS: For what? We are all
14 going to have a discussion off the record?
15 MR. PIKE: I think my client wants to
16 speak with me.
17 MR. EDWARDS: Okay.
18 MR. PIKE: Are you okay with that Ms.
19 Ezell?
20 MS. EZELL: Yes.
21 MR. PIKE: Off the record.
22 (Pause in the proceedings.)
23 THE VIDEOGRAPHER: --
24 THE WITNESS: Sorry, go ahead.
25 THE VIDEOGRAPHER: Back on the video

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1 record 3:33 p.m.
2 Q Later in that same deposition, Mr.
3 Horowitz asked "Did you have surveillance cameras
4 in either the interior or exterior of your home
5 at El Brillo Way between 2001 and 2006?"
6 You answered, "Mr. Horowitz, I'm going
7 to answer that question the same way as I've
8 answered most of your other questions here
9 today. I would like to answer each one of your
10 questions regarding your clients with great
11 specificity, however my counsel has advised me
12 that I may not today, and therefore have to
13 invoke my Fourteenth Amendment rights, my Sixth
14 Amendment rights and my Fifth Amendment rights as
15 provided by the U.S. Constitution."
16 So what about today? Can you answer
17 that question for us today?
18 MR. PIKE: Object to the form.
19 A Unfortunately, Ms. Ezell -- Mrs. Ezell,
20 I'm sorry.
21 Q Ms. is fine.
22 A Okay, Ms. Ezell. Unfortunately on
23 advise of counsel, I have to assert my rights as
24 protected by the Sixth, Fifth and Fourteenth
25 Amendment.

537	<p>1 MR. PIKE: And Ms. Ezell, let me caution 2 you that I've listened to several of your 3 questions. The first one being a repetition 4 of Mr. Horowitz's question approximately 5 four weeks ago dealing with your client 103, 6 so I did not have a problem with that 7 background information being repeated. 8 However, it seems that the questions that 9 you're discussing now and going over are 10 just a repetition of Mr. Horowitz's 11 background information, which has already 12 been established and really has no relation, 13 in my opinion, to your particular clients. 14 Given the fact we are here today, Mr. 15 Horowitz has taken the liberty of concluding 16 his deposition, obviously with rebuttal 17 available, same with Mr. Edwards, I would 18 ask, rather than to have to seek assistance 19 of the Court, that your questions be 20 tailored toward your client. 21 MS. EZELL: Mr. Pike, I would beg to 22 differ with you. Questions regarding his 23 sexual interests, including digitally 24 penetrating vaginas of girls between ages of 25 12 and 17 certainly pertain to my client.</p>	539	<p>1 MR. HOROWITZ: I join in Ms. Ezell's 2 comments. 3 MR. EDWARDS: Agreed. 4 MR. PIKE: Thank you. Three against 5 one. Nonetheless, again, I hold steadfast 6 the same argument. It is repetitious and 7 whether or not -- he is not going to waive 8 Fifth, Sixth and Fourteenth yesterday and he 9 is not going to waive it today, so... 10 MS. EZELL: That's fine. My objection 11 to that is that it is misleading for him to 12 say that "Today I have been instructed not 13 to answer it," because then I come here 14 hoping five weeks later I may get an answer, 15 and unfortunately that's not been the case. 16 We have had the same invocation of the 17 privileges today, only today, just for 18 today. 19 MR. PIKE: Well, I -- 20 MS. EZELL: I'm done with that line of 21 questioning. 22 MR. PIKE: Okay. 23 MS. EZELL: But I think I had the right 24 to ask. 25 MR. PIKE: Thank you.</p>
538	<p>1 MR. PIKE: Ms. Ezell, you were at that 2 deposition. You cross-noticed that 3 deposition and these cases have been 4 consolidated for discovery, and you have not 5 formed, with the exception of one question, 6 since you commenced your portion of the 7 depo, you have not formed one question 8 relative to your particular client. 9 You just asked a general question that 10 had already been asked by Mr. Horowitz who 11 commenced the Volume I of this Volume III or 12 IV continuation of the deposition. If you 13 want to tailor these questions to your 14 client, I have no problem with that, but to 15 ask the same exact question Mr. Horowitz 16 asked who commenced the deposition is a 17 waste of time. 18 MS. EZELL: That may be your opinion, 19 Mr. Pike, but I believe I have, particularly 20 in the way these questions were answered 21 five weeks ago, that today, that day he was 22 unable to answer because of advice of 23 counsel. I certainly have the right to ask 24 him whether this day, five weeks later, he 25 can answer that question.</p>	540	<p>1 MS. EZELL: Thank you. 2 Q Mr. Epstein, are you a citizen of the 3 United States? 4 A Yes. 5 Q And are you a citizen of the United 6 States Virgin Islands? 7 A I don't know what that means. 8 Q Of what State or territory of the United 9 States are you a citizen? 10 A I'm a citizen of the United States. 11 Q And of what State or territory in the 12 United States do you claim to be a citizen? 13 A I'm a citizen of the United States. 14 Q Where do you vote? 15 A I vote in the Virgin Islands. 16 Q Where do you pay your taxes? 17 MR. PIKE: Form. 18 A On advice of counsel, I'm going to have 19 to assert my rights as protected by the Sixth, 20 Fifth and Fourteenth Amendment. 21 Q And I would just note that your tax 22 returns are public documents available to the 23 government, and there is no -- no risk of 24 incriminating yourself with such a document. Do 25 you still maintain the same objection?</p>

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1 MR. PIKE: He does, and that calls for a
2 legal conclusion, which currently is, I
3 think, under -- it was under appeal and now
4 it is back under appeal.
5 **Q Before serving your jail time in Palm
6 Beach County, followed by your community control
7 time, was your principal place of residence the
8 dwelling in Manhattan?**
9 A The what?
10 **Q Your mansion in Manhattan?**
11 MR. PIKE: Form.
12 A I'm sorry, but at least today, I would
13 like to answer all your questions, Ms. Ezell.
14 However, on advice of counsel I will have to
15 respond by invoking my Sixth, Fifth and
16 Fourteenth Amendment.
17 **Q I won't repeat the same questions
18 regarding the plan or scheme. I'll try not to,
19 that have already been covered today. To the
20 extent that they didn't just apply to that one
21 plaintiff, in most instances, I believe that Mr.
22 Edwards said, "young women" or "young girls like
23 or including Jane Doe," but there were a few
24 additional questions in that area I wanted to
25 ask.**

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1 **Within that arrangement whereby girls
2 would come or be brought to your home to provide
3 massages and other sexual gratification for you,
4 were they often brought by taxis that were paid
5 for by you or by someone on your behalf?**
6 MR. PIKE: Form.
7 A Though I would like to answer all your
8 questions today, Ms. Ezell, I'm going to have to
9 respond to that question as I've responded to
10 most of your other questions, which is, on advice
11 of counsel, at least today, they've instructed me
12 to assert my rights as protected by the Sixth,
13 Fifth and Fourteenth Amendment.
14 **Q Also, within that same scheme, were
15 these girls sometimes transported to or from your
16 house by the current houseman employed by you at
17 that time?**
18 MR. PIKE: Form.
19 A Though I would like to answer all your
20 questions, Ms. Ezell, that question as well as
21 the others, I must unfortunately at least today,
22 on advice of counsel, invoke my Sixth Amendment,
23 Fifth Amendment and Fourteenth Amendment right.
24 **Q And again following with that plan as
25 discussed previously, were those same young women**

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1 **who came to your home to provide massages and
2 other sexual gratification for you, were they
3 often transported by [REDACTED] or other
4 assistants that you employed?**
5 MR. PIKE: Form.
6 A Though I would like to answer each and
7 every one of your questions, Ms. Ezell, I
8 respectfully must decline. On advice of counsel
9 they've instructed me I must assert my rights
10 protected by the Sixth, Fifth and Fourteenth
11 Amendment.
12 **Q Would you acknowledge, Mr. Epstein, that
13 once the girls were there, beginning with their
14 first experience, their first visit, there was a
15 sort of a ritual that was followed in regard to
16 how they were treated, what they were asked to do
17 and what occurred?**
18 MR. PIKE: I'm sorry, I didn't know if
19 that was the question.
20 MS. EZELL: It is a question.
21 THE WITNESS: What's the question?
22 MR. PIKE: What is the question?
23 **Q From the first visit a girl might make
24 to your home, was there a ritual or routine that
25 was followed with regard to what happened during**

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1 **that visit?**
2 MR. PIKE: Form.
3 A Ms. Ezell, I would like it answer all
4 your questions that you posed here today, but I
5 will have to respond unfortunately, as I've
6 responded to most of the others which is, my
7 counsel advised me I must respond by invoking my
8 Sixth, Fifth and Fourteenth Amendment.
9 **Q For instance, in addition to the other
10 things that Mr. Edwards and Mr. Horowitz asked
11 about, within the same area, would Ms. [REDACTED] or
12 one of your other assistants usually go up and
13 lay out the towels and particular massage oils
14 that you like?**
15 MR. PIKE: Form.
16 A Ms. Ezell, unfortunately I have to
17 answer that question as I've answered most of
18 your other questions here today, respectfully
19 decline to answer on advice of counsel who's
20 asked me to invoke my Sixth Amendment, Fifth
21 Amendment and Fourteenth Amendment right.
22 **Q Was it more or less routine that when a
23 girl would come for the first time, that she
24 would be accompanied to the massage area by
25 another woman or girl?**

1 MR. PIKE: Form.
2 A Ms. Ezell, I have to answer that
3 question as I answered most of your other
4 questions today, which is on advice of counsel, I
5 have to assert my rights as protected by the
6 Sixth, Fifth and Fourteenth Amendment.

7 Q Did it occur quite often that [REDACTED]
8 [REDACTED] would lead the girl up and introduce you
9 to her and then quietly leave?

10 MR. PIKE: Form.

11 A Ma'am, I'm going to respectfully have to
12 decline to answer that question today on advice
13 of counsel. They've asked me to assert my rights
14 as protected by the Sixth, Fifth and Fourteenth
15 Amendment. I would like to answer each and every
16 one of your questions.

17 Q Did it also occur sometime that the girl
18 would be accompanied by the girl who brought her,
19 and the girl who brought her would go up to your
20 bedroom and massage area with her, on her initial
21 visit?

22 MR. PIKE: Form.

23 A Again? Can you -- what's the question?

24 Q I'm asking about whether or not there
25 was a sort of routine that was followed when the

1 girls would come to your home to provide the
2 massages and other sexual gratification for you.
3 I'm asking whether or not part of that routine
4 was that they would be accompanied by the girl
5 who brought them?

6 MR. PIKE: Form.

7 A I'm going to have to, on advice of
8 counsel, answer that question by asserting my
9 rights as protected by the Sixth, Fifth and
10 Fourteenth Amendment.

11 Q If they were accompanied by the girl who
12 brought them, would it be your usual practice to
13 allow them to start the massage and then excuse
14 the girl who had brought the second girl for her
15 first visit?

16 MR. PIKE: Form.

17 A I'm going to do my best to respond to
18 these questions, but my counsel has advised me
19 that I must assert my rights as protected by the
20 Sixth, Fifth and Fourteenth Amendment, Ms. Ezell,
21 so I respectfully must decline.

22 Q Did you have a routine way that you
23 liked the massage itself to be conducted?

24 MR. PIKE: Form.

25 A Ms. Ezell, I'm going to have to

1 respectfully decline to answer that question, on
2 advice of counsel, they've asked me to assert my
3 rights as protected by the Sixth, Fifth and
4 Fourteenth Amendment.

5 Q Did either Ms. [REDACTED] or you, or the
6 girl who perhaps had been there before instruct
7 the new girl to begin by massaging the back of
8 your legs and your back?

9 MR. PIKE: Form.

10 A I would like to respond to all your
11 questions, but unfortunately at least today, my
12 counsel has advised me I must assert my rights as
13 protected by the Sixth, Fifth and Fourteenth
14 Amendment.

15 Q And did you or Ms. [REDACTED] generally ask
16 the girls or instruct the girls to remove their
17 clothing?

18 MR. PIKE: Form.

19 A Unfortunately, Ms. Ezell I have to
20 respectfully decline to answer that question
21 today. On advice of counsel, they've asked me to
22 assert my Sixth Amendment, Fifth Amendment and
23 Fourteenth Amendment right.

24 Q After having the back of your legs --
25 the feet, the back of your legs and your back

1 massaged, would you then typically turn over,
2 exposing yourself, laying on your back?

3 MR. PIKE: Form.

4 A Ms. Ezell, I'm going to respectfully
5 have to decline to answer that question today,
6 because my counsel has asked me to assert my
7 Sixth Amendment, Fifth Amendment and Fourteenth
8 Amendment right, though I would like to answer
9 every one of your questions.

10 Q Would it be your practice at that point,
11 depending on the skittishness of the girl to
12 begin trying to fondle her breasts or rub her
13 vagina?

14 MR. PIKE: Form.

15 A Ma'am, I respectfully have to decline to
16 answer that today, though I would like to answer
17 each one of these questions. My counsel has
18 instructed me to assert my Sixth Amendment, Fifth
19 Amendment and Fourteenth Amendment right.

20 Q Assuming the girl was ill at ease, would
21 it be your practice to then talk with her to try
22 to elicit from her, her interests, her goals, the
23 things that were important to her in her life?

24 MR. PIKE: Form.

25 Q Was that part of your routine?

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1 MR. PIKE: Sorry. Form.
2 A Ma'am, though I would like to answer
3 every one of your questions today, unfortunately
4 my counsel has advised me I must assert my rights
5 as protected by the Sixth, Fifth and Fourteenth
6 Amendment.
7 Q Would it generally be your practice, if
8 the girl was skittish, to perhaps wait until the
9 second visit to introduce a vibrator into the
10 routine?
11 MR. PIKE: Form.
12 A Ms. Ezell, unfortunately I have to
13 answer that question the same way as I've
14 answered every one of your questions today, which
15 is, I would have to assert my rights protected by
16 the Sixth, Fifth and Fourteenth Amendment on
17 advice of counsel.
18 Q Would you try to calm the girl by
19 telling her to relax, that there was nothing
20 wrong with what was going on?
21 MR. PIKE: Form.
22 A Ma'am, unfortunately I have to respond
23 to that question as I've responded to most of
24 your other questions here today, which is by
25 invoking my Sixth Amendment, Fifth Amendment and

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1 Fourteenth Amendment right.
2 Q Assuming that the girl made it through
3 the first session, would you generally wait until
4 you had reached climax before dismissing her?
5 MR. PIKE: Form.
6 THE WITNESS: Earthquake?
7 MR. PIKE: Train. For the record a
8 train is going by.
9 A Ms. Ezell, unfortunately I have to
10 respond to that question as I've responded to
11 most of the other questions here today, which is
12 I must assert my rights protected by the Sixth,
13 Fifth and Fourteenth Amendment on advice of my
14 counsel.
15 Q Would you generally pay the new girl
16 \$200 for the massage, either by telling her that
17 the money was on the counter or by telling her
18 that Ms. [REDACTED] would pay her downstairs?
19 MR. PIKE: Form.
20 A Unfortunately, Ms. Ezell, today I have
21 to respond to that question the same way I've
22 responded to all your other questions, which is
23 by invoking my Sixth Amendment, Fifth Amendment
24 and Fourteenth Amendment right.
25 Q And if that girl had been brought by

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1 another girl, was it your practice to pay the
2 procuring girl at least \$200 for bringing the new
3 girl?
4 MR. PIKE: Form.
5 A Again? Sorry. Can you repeat the
6 question?
7 Q Sure. Maybe I can state it a little
8 better.
9 Did you tell the girls that you would
10 pay them \$200 every time they brought a new
11 girl?
12 MR. PIKE: Form.
13 A Unfortunately, Ms. Ezell, I'm going to
14 have to respond to that question the same way as
15 I've responded to most of your other questions
16 today. On advice of counsel, they've instructed
17 me to assert my Sixth Amendment, Fifth Amendment
18 and Fourteenth Amendment right.
19 Q And indeed, did you keep that promise
20 and either pay them directly or have Ms. [REDACTED]
21 pay the procurer \$200 for each new girl that she
22 brought?
23 MR. PIKE: Form.
24 A Unfortunately, Ms. Ezell, I have to
25 respond to that question respectfully the same as

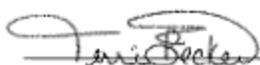
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1 I responded to most of your other questions here
2 today. My counsel has advised me I must assert
3 my rights as protected by the Sixth, Fifth and
4 Fourteenth Amendment.
5 THE WITNESS: Can we take a two-minute
6 break?
7 THE VIDEOGRAPHER: Going off the video
8 record 3:54 p.m.
9 (Pause in the proceedings.)
10 THE VIDEOGRAPHER: Back on the video
11 record 3:56 p.m.
12 Q Did you let the girls know that the more
13 they let you do, the more they would be paid?
14 MR. PIKE: Form. Again, I'm really
15 trying to work with you, Ms. Ezell, but that
16 is... is an exact question that Mr. Horowitz
17 asked at the commencement of the
18 deposition. We are back in generalities
19 again, and it is repetitious. If you could,
20 let's try to narrow it to your client.
21 MS. EZELL: I'm certainly entitled to
22 see how my client fits into the big picture
23 or my clients, and whether this was part of
24 a pattern and whether they indeed were
25 treated according to a pattern or scheme or

1 routine.
 2 MR. PIKE: Okay. I just don't hear any
 3 questions regarding your clients. That's
 4 what I'm saying.
 5 **Q Do you recall that the first time [REDACTED]**
 6 **came to provide you a massage, you told her to**
 7 **take off her clothing, which she refused to do?**
 8 MR. PIKE: Form.
 9 A A.H. -- can we use names so there is no
 10 confusion here?
 11 **Q A.H. Is [REDACTED] She is Jane Doe 103.**
 12 A I'm going to have to respond to that
 13 question, as I responded to all your other
 14 questions, Ms. Ezell, respectfully, and on advice
 15 of counsel I have to assert my rights as
 16 protected by the Sixth, Fifth and Fourteenth
 17 Amendment.
 18 **Q And when she did refuse to do that, did**
 19 **you begin to try to touch her and paw at her and**
 20 **remove some of her clothing?**
 21 MR. PIKE: Form.
 22 A Ma'am, I would respectfully -- I would
 23 like to answer that question, as I would like to
 24 answer most of the questions you've posed here
 25 today. Respectfully, I'm going to have to

1 pre-existing obligation beginning at 4:00
 2 o'clock. Hold on a second, guys. So this
 3 deposition will be continued consistent with
 4 various court orders.
 5 MS. EZELL: Okay, thank you.
 6 THE VIDEOGRAPHER: Going off the video
 7 record 4:00 p.m.
 8 THE COURT REPORTER: Thank you all.
 9 Same orders as yesterday?
 10 MR. EDWARDS: Yes.
 11 MR. HOROWITZ: Yes.
 12 MR. PIKE: Yes.
 13 MS. EZELL: Yes, please.
 14 THE COURT REPORTER: Thank you all.
 15 (Whereupon, the deposition was adjourned
 16 at 4:05 o'clock, p.m., sine die.)
 17
 18
 19
 20
 21
 22
 23
 24
 25

1 decline on advice of counsel and invoke my Sixth
 2 Amendment, Fifth Amendment and Fourteenth
 3 Amendment right.
 4 **Q Over the approximately 17 months that**
 5 **[REDACTED] came to your home, did you or your agents**
 6 **frequently call her at her home number or her**
 7 **cell number arranging for encounters, arranging**
 8 **for her to come to your home to provide the**
 9 **massage and sexual favors, sometimes as much as**
 10 **twice a day?**
 11 MR. PIKE: Form.
 12 **Q Let's break it up.**
 13 **During the 17 months that she came to**
 14 **your home, did it frequently happen that you or**
 15 **one of your agents would call ahead of time to**
 16 **tell her that you would be coming to town?**
 17 MR. PIKE: Form.
 18 A Ma'am, I'm going to respectfully have to
 19 decline to answer that question on advice of
 20 counsel. They've instructed me to assert my
 21 Sixth Amendment, Fifth Amendment and Fourteenth
 22 Amendment right.
 23 MR. PIKE: Ms. Ezell, as you know we've
 24 discussed this at the commencement of
 25 today's deposition, that we had a

1 THE STATE OF FLORIDA)
 2 COUNTY OF PALM BEACH)
 3 I, TERRI BECKER, a Registered
 4 Professional Reporter and Notary Public for the
 5 State of Florida at Large, do hereby certify that
 6 I reported the videotaped continued deposition of
 7 JEFFREY EPSTEIN, the DEFENDANT, called by the
 8 PLAINTIFF in the above-entitled action; that the
 9 witness was duly sworn by me; that the foregoing
 10 pages, numbered from 336 to 560, inclusive,
 11 constitute a true record of the deposition by
 12 said witness.
 13 I further certify that I am not attorney
 14 or counsel of any of the parties, nor a relative
 15 or employee of any attorney or counsel connected
 16 with the action, nor financially interested in
 17 the action.
 18 WITNESS MY HAND and official seal in the
 19 City of West Palm Beach, County of Palm Beach,
 20 State of Florida, this 19th day of April 2010.
 21 
 22 TERRI BECKER, Registered
 23 Professional Reporter and
 24 Notary Public, State of Florida
 25 at Large. My Commission expires
 March 13, 2011.

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1 THE STATE OF FLORIDA)
2 COUNTY OF PALM BEACH)

3
4

5 The foregoing certificate was
6 acknowledged before me this _____
7 day of _____ 2010.

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15 _____
16 Notary Public, State of Florida.
17 My commission No.
18 Expires March 13, 2011.

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1 I, JEFFREY EPSTEIN, do hereby
2 certify that I have read the foregoing transcript
3 of my deposition given on April 14, 2010; that
4 together with the correction page attached hereto
5 noting changes in form or substance, if any, it
6 is true and correct.

7
8

9 _____
10 JEFFREY EPSTEIN

11
12
13
14

15 I do hereby certify that the deposition
16 of JEFFREY EPSTEIN was submitted to the witness
17 for reading and signing; that after he had stated
18 to the undersigned Notary Public that he had read
19 and examined his deposition, he signed the same
20 in the presence of the undersigned authority on
21 the ____ day of _____ 2010.

22
23
24
25

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1 ERRATA SHEET
2 In Re: JANE DOE V. EPSTEIN
3 DO NOT WRITE ON TRANSCRIPT
4 ENTER CHANGES HERE:

5 PAGE LINE CHANGE REASON
6 _____
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____

15 _____
16 JEFFREY EPSTEIN

17
18

19 THE STATE OF FLORIDA)
20 COUNTY OF PALM BEACH)
21 I DO HEREBY CERTIFY THAT JEFFREY EPSTEIN
22 appeared before me and stated that he has read
23 his deposition; further, that this Errata Sheet
24 was signed in my presence on this _____ day
25 of _____ 2010.

560

1 U.S. LEGAL SUPPORT
2 Registered Professional Reporters
3 444 West Railroad Avenue
4 Suite 300
5 West Palm Beach, Florida 33401
6
7 April 19, 2010

8 BURMAN, CRITTON, LUTTIER & COLEMAN
9 303 Banyon Boulevard
10 Suite 400
11 West Palm Beach, Florida 33401
12
13 ATTENTION: MICHAEL PIKE, ESQ.
14
15 In Re: JANE DOE V. EPSTEIN
16 Deposition of: JEFFREY EPSTEIN

17 Dear Mr. Pike:

18 Since counsel have agreed that you may
19 have the witness read and sign your copy of the
20 deposition, for your convenience, enclosed
21 herewith you will find an Errata Sheet for the
22 witness' use in entering any changes to the
23 deposition.
24 Thank you for your prompt attention.
25 Cordially yours,
U.S. LEGAL SUPPORT

TERRI BECKER, Registered
Professional Reporter, Notary
Public, State of Florida at
Large. My commission expires
March 13, 2011.

CC: Adam Horowitz, Esq.
Bradley Edwards, Esq.
Katherine Ezell, Esq.