

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

Related cases:

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

DEPOSITION OF JANE DOE #7 - VOLUME I
(videotaped)

Monday, March 15, 2010
10:02 - 6:49 p.m.

250 Australian Avenue South
Suite 1500
West Palm Beach, Florida 33401

Reported By:
Rachel W. Bridge, RMR, CRR
Notary Public, State of Florida

1 APPEARANCES:
 2 On behalf of the Plaintiffs in related cases
 3 Nos. 08-80069, 08-80119, 08-80232, 08-80380,
 4 08-80381, 08-80993, 08-80994:
 5 ADAM D. HOROWITZ, ESQUIRE
 6 MERMELSTEIN & HOROWITZ, P.A.
 7 18205 Biscayne Boulevard
 8 Suite 2218
 9 Miami, Florida 33160
 10 Telephone: 305/931-2200
 11
 12 On behalf of the Defendant Jeffrey Epstein:
 13 ROBERT D. CRITTON, JR., ESQUIRE
 14 BURMAN, CRITTON, LUTTIER & COLEMAN
 15 393 Banyan Boulevard
 16 Suite 400
 17 West Palm Beach, Florida 33401
 18 Telephone: 561/842-2820

19 Also Present: Sasha Quimby, videographer

20
21
22
23
24
25

1 PROCEEDINGS
 2 ---
 3 Deposition taken before Rachel W. Bridge,
 4 Certified Realtime Reporter and Notary Public in and for
 5 the State of Florida at Large, in the above cause.

6 ---
 7 THE VIDEOGRAPHER: This is the 15th day of
 8 March, 2010. The time is 10:02 a.m.
 9 This is the videotape deposition of Jane Doe
 10 #7 in the matter of Jane Doe number two versus
 11 Epstein. This deposition is being held at 250
 12 Australian Avenue South, West Palm Beach, Florida.
 13 My name is Sasha Quimby. I'm the videographer
 14 representing Visual Evidence, Inc.

15 Would the attorneys please announce their
16 appearances for the record.

17 MR. HOROWITZ: Sure. My name is Adam
18 Horowitz, counsel for the witness, plaintiff.

19 MR. CRITTON: Bob Critton for Jeffrey Epstein.
20 Thereupon,

21 (JANE DOE #7)
22 having been first duly sworn or affirmed, was examined
23 and testified as follows:

24 THE WITNESS: I do.
25

1 ---
 2 INDEX
 3 ---
 4 WITNESS: DIRECT CROSS REDIRECT RECROSS
 5 Jane Doe #7
 6 By Mr. Critton 5

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EXHIBITS

EXHIBIT	PAGE
Defendant's 1	233
Defendant's 2	233
Defendant's 3	233
Defendant's 4	263
Defendant's 5	268
Defendant's 6	274
Defendant's 7	280
Defendant's 8	294
Defendant's 9	301

1 DIRECT EXAMINATION
 2 BY MR. CRITTON:
 3 Q. Please tell me your full name.
 4 A. Jane Doe 7.
 5 Q. Where do you live, ma'am?
 6 A. I live in Orlando.
 7 Q. I understand that. Where, give me your
 8 address, please.
 9 A. [REDACTED]
 10 [REDACTED]
 11 Q. Is that apartment or a home?
 12 A. It's an apartment, [REDACTED].
 13 Q. And with whom do you live at that apartment?
 14 A. I have a roommate, [REDACTED].
 15 Q. What's [REDACTED], please.
 16 A. [REDACTED]
 17 Q. The last name?
 18 A. [REDACTED]
 19 Q. [REDACTED]
 20 A. I think it's [REDACTED].
 21 Q. How long has [REDACTED] been your roommate?
 22 A. She's been my roommate for about four months
 23 now.
 24 Q. Have you ever given a deposition before?
 25 A. No, I have not.

1 Q. I'm confident that Mr. Horowitz, your
 2 attorney, has told you about the procedure. I get to
 3 ask you a lot of questions and he may have some
 4 questions at the end. You understand that?
 5 A. Uh huh.
 6 Q. Yes?
 7 A. Yes.
 8 Q. You need to answer out loud, yes, nos, I don't
 9 know, I don't recall, whatever your answer is. Do you
 10 understand that as well?
 11 A. Yes.
 12 Q. Okay. If I ask you a question that you don't
 13 understand, ask me to either to rephrase it or to repeat
 14 it. I'll be happy to do that, all right?
 15 A. Uh huh -- yes.
 16 Q. All right. If you answer a question, I'm
 17 going to assume that you've understood it and answered
 18 it truthfully. Fair?
 19 A. Yes.
 20 Q. All right. Any time you want to take a break,
 21 let us know. I'm okay with that unless you're in the
 22 middle of a question or I'm in a series of questions
 23 then I'll probably balk at it, but other than that, just
 24 let us know.
 25 You understand you are under oath today?

1 A. Yes.
 2 Q. And you understood when you are put under
 3 oath, whether by a court reporter at a deposition or if
 4 at a trial if this case goes to trial or by a police
 5 officer, you are required to tell the truth?
 6 A. Yes.
 7 Q. If you don't tell the truth, you may be
 8 committing a crime, committing the crime of perjury.
 9 Do you understand that?
 10 MR. HOROWITZ: Form.
 11 THE WITNESS: Yes.
 12 BY MR. CRITTON:
 13 Q. I'm sorry?
 14 A. Yes.
 15 Q. You've been put under oath before, true?
 16 A. Yes.
 17 Q. Okay. And you understand that you were sworn
 18 to tell the truth?
 19 A. Yes.
 20 Q. Okay. On how many occasions have you been put
 21 under oath where you have given testimony about
 22 anything?
 23 A. I believe I was under oath at -- was that when
 24 the medical examiner's, I guess it was --
 25 Q. Medical examiner, who was that?

1 A. I guess I wasn't under oath for that.
 2 Q. Do you understand the distinction between
 3 being under oath and not under oath? Is that a yes?
 4 A. Yes.
 5 Q. Okay. What's the distinction to you?
 6 A. That you have to tell the full truth.
 7 Q. Okay, all right.
 8 A. Actually I don't know, because I, I don't
 9 remember being under oath for the medical examiner, so
 10 maybe --
 11 Q. So you had a medical exam by whom?
 12 A. By Dr. Kilman and your medical examiner. I
 13 forget his name.
 14 Q. Okay. When did you see my medical examiner?
 15 How long ago?
 16 A. About two weeks ago.
 17 Q. And you spent how long with him?
 18 A. About five hours.
 19 Q. And he took the history, background
 20 information from you as well as you did testing,
 21 correct?
 22 A. Yes.
 23 Q. And that was two weeks ago, but you don't
 24 remember his name?
 25 A. No.

1 Q. And you called -- the evaluator or the person
 2 who did the examination at your attorney's request for
 3 you in this case is Dr. who?
 4 A. Kilman.
 5 Q. Kilman, all right. How do you think you spell
 6 that?
 7 A. K-i-l-m-a-n. I'm guessing.
 8 Q. All right. Since the time you had -- and I'll
 9 represent to you his real name is Kliman.
 10 A. Kliman, sorry.
 11 Q. That's all right. Since you did your
 12 examination with him in December of '08, it was
 13 December 5th of '08, have you had any contact with him
 14 whatsoever, him being Dr. Kliman?
 15 A. No, I have not.
 16 Q. So with both Dr. Kliman and Dr. Hall, you
 17 weren't under oath, correct, as you understand it?
 18 A. No, I guess not.
 19 Q. I'm sorry?
 20 A. No, I guess no.
 21 Q. Well, did you tell him the truth? Did you
 22 tell both of them the truth?
 23 A. Yes.
 24 Q. All right. So even though you weren't under
 25 oath, so there may not be a penalty of perjury

1 associated with it if you lied, it's your testimony that
2 you told both Dr. Kliman and Dr. Hall the truth?

3 A. Yes.

4 Q. Okay. And during the examination that was
5 done by Dr. Hall, did you feel that you had enough time
6 to take breaks, that you had an opportunity to fully
7 explore all of the issues that you wanted to discuss
8 with him?

9 A. Yes.

10 Q. All right. Did you think he was fair with you
11 and treated you with respect during the course of the
12 interview?

13 A. Yes, I did.

14 Q. Now I think you told me you've never given a
15 deposition before like we're doing here today?

16 A. Yes.

17 Q. That's correct?

18 A. Yes.

19 Q. And you've never testified in court, true?

20 A. Yes.

21 Q. Do you understand that if in fact this case is
22 not resolved at some point, that you will be testifying
23 in court and people will know that you are Jane Doe 7 in
24 court?

25 A. Yes.

1 Q. Okay. And you may no longer be Jane Doe, and
2 whether it's a newspaper or anyone who wants to do a
3 story about this case, your name may well become public;
4 do you understand that?

5 MR. HOROWITZ: Form.

6 THE WITNESS: Yes.

7 BY MR. CRITTON:

8 Q. All right. Now at some point did you give
9 a -- you met with police officers; is that correct,
10 associated with the Town of Palm Beach?

11 A. Yes.

12 Q. And did they take a statement from you?

13 A. Yes, they did.

14 Q. And I assume you told -- the police officers
15 put you under oath as well, you swore to tell the whole
16 truth, nothing but the truth, so help you God? They put
17 you under oath?

18 A. Yes.

19 Q. And you told them the truth as well, correct?

20 A. I didn't tell them the complete truth.

21 Q. You lied to the police officers; is that what
22 you're saying?

23 A. Yes. I was scared and I was about 18, and I
24 was confused. They just showed up at my house with no
25 warning, and I was just kind of in shock and I was kind

1 of scared, because [REDACTED] called me and left a voicemail
2 on my phone asking about the cops. And I just like
3 didn't know what was going on. So no, I didn't tell
4 them everything that happened.

5 Q. Okay.

6 A. And my parents were there.

7 Q. Let me move to strike as nonresponsive.

8 But let me get back to you lied to the police
9 officers when they took a, from the Town of Palm
10 Beach -- strike that.

11 It's your testimony now even though you know
12 that you could be penalized or that you could be found
13 guilty of perjury, it didn't bother you at all to lie to
14 police officers when they put you under oath back in
15 October of 2005; is that correct?

16 MR. HOROWITZ: Object to form and asked and
17 answered.

18 THE WITNESS: Yes.

19 BY MR. CRITTON:

20 Q. Okay. I'll ask you to assume that the police
21 officers interviewed you from the Town of Palm Beach on
22 October 4th of 2005, all right?

23 A. Uh huh.

24 Q. Yes?

25 A. Yes.

1 Q. Okay. Have you read anything through today's
2 date that suggests to you that you lied to the police
3 officers? That is, what have you seen that makes you
4 remember that you lied to the police officers?

5 A. I just remember from my own memory what I told
6 them, that I didn't tell them everything that went on.

7 Q. Well, you keep saying I didn't tell them
8 everything. In essence, you lied to the police
9 officers, correct?

10 MR. HOROWITZ: Form. That's the third time
11 you asked the question.

12 MR. CRITTON: Well, but she keeps changing the
13 answer, so --

14 MR. HOROWITZ: No, no, no.

15 MR. CRITTON: You can object to the form.

16 MR. HOROWITZ: Bob, you are harassing her.

17 MR. CRITTON: I'm not harassing her. She
18 keeps saying I didn't tell them the whole thing.
19 There is a distinction between a lie and not
20 telling the truth.

21 MR. HOROWITZ: She said --

22 MR. CRITTON: I understand what she's trying
23 to say.

24 MR. HOROWITZ: She answered your question.
25

1 BY MR. CRITTON:
 2 Q. Back to my question, ma'am. On October 4 of
 3 2005 when the police officers came to interview you and
 4 you did not tell them the truth, or from your
 5 perspective the complete truth, you say you were only 18
 6 at the time.
 7 A. I was younger and I was confused. And my
 8 parents were there and they showed up without me having
 9 any knowledge that they were going to be there besides a
 10 telephone call I got from my parents.
 11 And I showed up and I was scared. I was
 12 scared I was going to get in trouble. I was scared what
 13 my parents would think. I was upset. I mean a lot of
 14 things were going on then.
 15 Q. Okay. You were scared what your -- and
 16 confused as to what your parents would think, but, but
 17 you weren't too scared to not tell the police officers
 18 the truth, correct?
 19 A. I guess you could say that, yes.
 20 Q. How else would you describe it?
 21 A. Just how I did.
 22 Q. All right. Okay. You were 18 at the time.
 23 You were an adult, right?
 24 A. Uh huh.
 25 Q. Yes?

1 A. Uh huh.
 2 Q. Yes?
 3 A. Yes, that's correct.
 4 Q. And you said -- so how long did it take you to
 5 get home?
 6 A. I was about five minutes away from my house.
 7 Q. All right. Did you tell your parents don't
 8 want to talk to them, I'm scared and confused, maybe
 9 even in shock and I'm only 18, so tell them not to come?
 10 MR. HOROWITZ: Form.
 11 THE WITNESS: I didn't say that at all. I
 12 was, I had no idea what it was about, so I had no
 13 idea it was about the whole Jeffrey Epstein thing.
 14 BY MR. CRITTON:
 15 Q. Well, had anybody called you and told you
 16 anything about Jeffrey Epstein or that the police were
 17 interviewing individuals related to Jeffrey Epstein?
 18 MR. HOROWITZ: Form.
 19 THE WITNESS: No, besides [REDACTED] left a
 20 voicemail, but it was I think when I already got
 21 there, she left a voicemail saying about, asking if
 22 I had, if the cops were at my place and I was
 23 talking to them and if I was going to ask them any
 24 questions. She just left me a voicemail, so --
 25

1 A. Yes.
 2 Q. And you were 18?
 3 MR. HOROWITZ: Form.
 4 THE WITNESS: Yes.
 5 BY MR. CRITTON:
 6 Q. In 2005. Were you in college at the time?
 7 A. I believe I went to [REDACTED]
 8 Q. [REDACTED] is where?
 9 A. It's in Orlando.
 10 Q. So you were in college at the time, correct?
 11 A. Yes.
 12 Q. The police officers called your home?
 13 A. Yes.
 14 Q. And --
 15 A. Well, they didn't call my home. They just
 16 showed up there and my parents called me saying that
 17 there were two police officers there waiting for me.
 18 Q. And so you must have been home from school at
 19 that time?
 20 A. Yes, I was. I was on break.
 21 Q. You were on break. So you had, at least your
 22 parents called you and said there's two police officers
 23 here from the Town of Palm Beach?
 24 A. Yes.
 25 Q. And they want to talk to you?

1 BY MR. CRITTON:
 2 Q. What about Jane Doe 4, hadn't you talked to
 3 Jane Doe 4, because she had been interviewed by the
 4 police officers, hadn't she?
 5 A. I don't think she was interviewed before me.
 6 Q. You think your interview preceded or was
 7 before Jane Doe 4?
 8 MR. HOROWITZ: Form.
 9 THE WITNESS: I can't remember exactly, but I
 10 think so, yes.
 11 BY MR. CRITTON:
 12 Q. So you show up, you are 18, you are an adult.
 13 You can choose to either talk to the police or not,
 14 correct?
 15 A. Uh huh.
 16 Q. Yes?
 17 A. Yes.
 18 MR. HOROWITZ: Form.
 19 BY MR. CRITTON:
 20 Q. All right. The confusion from your
 21 perspective was you didn't know why the police were
 22 there?
 23 MR. HOROWITZ: Form.
 24 BY MR. CRITTON:
 25 Q. Right?

1 A. Yes.
 2 Q. All right. You may have been scared
 3 originally, why are the police at my home?
 4 A. (Witness nods head up and down.)
 5 Q. All right, I understand that. So you come
 6 in. There are two police officers. Males, or one male,
 7 one female?
 8 A. There are two males.
 9 Q. They introduce themselves?
 10 A. Yes.
 11 Q. And what did they say they wanted to talk --
 12 let me strike that.
 13 Did you speak to the two officers together or
 14 were your parents right there with you?
 15 A. My parents were there when they were there and
 16 I was there.
 17 Q. So did you all sit down in the living room?
 18 A. We sat down outside and they said they wanted
 19 to talk to me. I don't exactly remember what they said,
 20 but they said something about Jeffrey. And that's when
 21 I asked my mom if she could go inside the house. And
 22 that's when I talked to them.
 23 Q. How about your dad, was he there too?
 24 A. He wasn't there at the house. He was at work.
 25 Q. I thought you said both your parents was

1 there. So it was only your mom that was there?
 2 A. Well, he came home later.
 3 Q. I understand that, but you left the impression
 4 with me earlier that your dad was there and your mom
 5 were there, they were waiting there with the police
 6 officers. That's not correct?
 7 MR. HOROWITZ: Form.
 8 THE WITNESS: Well, my mom was there and then
 9 my dad came home later, so I guess --
 10 BY MR. CRITTON:
 11 Q. When the police officers were still there?
 12 A. Yes.
 13 Q. So mom, the four of you sit down outside, the
 14 police officers say I'd like to talk to you about
 15 Jeffrey Epstein, you asked your mom to go inside?
 16 A. Uh huh.
 17 Q. Yes?
 18 A. Yes.
 19 Q. You certainly have the presence of mind to say
 20 "Mom, go inside"?
 21 A. Yes.
 22 Q. Why, if you are 18, only 18, as you describe
 23 it, you are confused, you are scared and you are in
 24 shock, why wouldn't you keep someone who is very close
 25 to you, your mother, there before you talked to the

1 police officers?
 2 Why did that not make sense to you, ma'am?
 3 MR. HOROWITZ: Form.
 4 THE WITNESS: Because I did not want to hurt
 5 my mom and let her find out about everything that
 6 happened with Jeffrey. I don't think that's fair
 7 to her to hear that from a cop without me telling
 8 her first.
 9 BY MR. CRITTON:
 10 Q. Okay. Well, but you were confused, scared --
 11 and in shock. So don't most young adults who have good
 12 relationships with their parents, isn't that one of the
 13 first people you would want to talk to is either your
 14 mother or father, have them both around?
 15 MR. HOROWITZ: Object to the form.
 16 THE WITNESS: No, that would be the last, I
 17 wouldn't want her to find out anything until I had
 18 time to sit down with her and tell her. I wouldn't
 19 want to have her there while cops were
 20 interrogating me.
 21 BY MR. CRITTON:
 22 Q. So you knew that the cops were going to
 23 interrogate you -- I'm using your word -- right?
 24 A. Yes. I'm sure they were going to ask me
 25 questions about Jeffrey and what happened.

1 Q. So therefore, you certainly had the presence
 2 of mind to say, after you knew why the police were
 3 there, the four of you were standing or sitting outside
 4 and you said, "Mom, go inside," because you wanted to be
 5 able to talk --
 6 A. Well, actually --
 7 Q. Can I finish my question, please?
 8 You wanted to be able to move Mom to a
 9 different section of the house so you could talk to the
 10 police officers, find out what they wanted, and then
 11 think about what ultimately you would tell your mom;
 12 fair statement?
 13 MR. HOROWITZ: Form, compound.
 14 THE WITNESS: Yes, and also the cops asked her
 15 to go inside too. They, they were actually the
 16 ones that recommended it. And then I asked her, I
 17 said, "Yes, Mom, could you go inside?"
 18 BY MR. CRITTON:
 19 Q. But you could have said "No, I want my mom
 20 here"?
 21 A. I didn't want her there.
 22 Q. I understand you didn't, but you could have
 23 said "I want my mother here"?
 24 A. Of course I could have.
 25 Q. All right. But again, you had the presence of

1 mind to determine whether or not you wanted your mother
2 to stay or not stay, correct?

3 MR. HOROWITZ: Form.

4 THE WITNESS: Yes.

5 BY MR. CRITTON:

6 Q. Let me tell you one other thing. From time to
7 time I'll ask questions and I may not be done. If I'm
8 not done with the question, I'm going to tell you,
9 because not to be rude to you, but to be certain you
10 understand my full question, right? So that you can
11 hear the full thing.

12 If I chop you off in an answer, just let me
13 know. Say, "Critton, I'm not done with my answer," and
14 then I'll let you finish your answer, okay? So that way
15 I make certain that I hear your response as well.

16 A. Okay.

17 Q. Okay. So did you tell the police officers
18 after you had presence of mind to send your mom into the
19 house, say "Look, I don't really want to talk to you
20 about this, I'd like to be able to talk to my parents
21 first and then I'll talk to you later"?

22 A. I kind of wanted to know what was going on,
23 and they made it sound like I needed to talk to them or
24 I would get in trouble if I didn't talk to them.

25 Q. Why would you get in trouble?

1 A. Because --

2 MR. HOROWITZ: Form.

3 THE WITNESS: -- they are the cops, and I was
4 young, I didn't know.

5 BY MR. CRITTON:

6 Q. You were 18. You were an adult.

7 MR. HOROWITZ: Form.

8 BY MR. CRITTON:

9 Q. Right?

10 A. Yeah, if you can -- yes.

11 Q. All right. And other times that you were
12 either confused or scared, you had called your parents
13 and said "Hey, look, I have this particular problem or I
14 don't have this -- or I have this particular problem,
15 what should I do?"

16 You have done that with your parents before?

17 A. Yes.

18 Q. All right. Anyhow, so you decide to sit down
19 and talk with police officers. You made that decision?

20 MR. HOROWITZ: Form.

21 BY MR. CRITTON:

22 Q. Correct?

23 A. Well, it was kind of like I felt like I had
24 to. They were at my house. I didn't know any better.

25 Q. Sure. You have seen TV shows before, had you

1 not?

2 A. Yes.

3 Q. Where police officers want to come and talk to
4 a particular witness, maybe a suspect in the crime,
5 sometimes they talk, sometimes they don't?

6 You know that, we've all seen "Law and Order"
7 and those series. You have seen them too, haven't you?

8 MR. HOROWITZ: Form.

9 THE WITNESS: Yes.

10 BY MR. CRITTON:

11 Q. Anyhow, you make a conscious decision to say
12 okay, I'm going to sit down and talk with the police
13 officers and find out what they want to ask me, right?

14 A. Yes.

15 Q. How long were they there?

16 A. They were there for about an hour and a half,
17 two hours. I really don't remember.

18 Q. Did they have a tape recorder with them?

19 A. I believe so.

20 Q. Did they talk to you -- during the entire time
21 they talked to you, did they have the tape recorder on?

22 MR. HOROWITZ: Form.

23 THE WITNESS: I don't remember.

24 BY MR. CRITTON:

25 Q. Did they have it on for a portion of the

1 interview?

2 A. Yes.

3 Q. And where you raised your right hand and you
4 were sworn to tell the truth?

5 A. Yes.

6 Q. And they asked you a bunch of questions?

7 A. Yes.

8 Q. And if I understand your testimony, it's --
9 your position is you didn't lie to them, you just didn't
10 tell them everything; is that correct?

11 MR. HOROWITZ: Form.

12 THE WITNESS: I admitted that I lied and I
13 didn't tell the whole truth, but I did not tell
14 them everything that happened. I just told them
15 some of what happened.

16 BY MR. CRITTON:

17 Q. Have you ever looked at the police report or
18 any probable cause affidavit or police report in
19 preparation for your deposition today?

20 A. Their police report?

21 Q. Have you seen any portions of the police
22 report that related to the interview relating to you?

23 A. No, I don't think so.

24 Q. Have you looked at anything in preparation for
25 your deposition today?

1 A. I just read over the Kilman -- Kliman,
 2 sorry --
 3 Q. Kliman what?
 4 A. When I had an interview with him.
 5 Q. You mean his questions, your answers, or his
 6 summary of what you said?
 7 MR. HOROWITZ: Form.
 8 THE WITNESS: Just his questions and my
 9 answers.
 10 BY MR. CRITTON:
 11 Q. Did you read over your interrogatories, your
 12 answers to the interrogatories?
 13 A. Yes.
 14 Q. Okay. When did you do that?
 15 A. Actually, I did it right before I came in here
 16 just to kind of rejob my memory.
 17 Q. That's fine. Did you look at anything else?
 18 A. No.
 19 Q. Have you read anybody else's deposition who
 20 gave a deposition in this case?
 21 A. I haven't read anybody else's deposition.
 22 Q. Have you talked to anyone? You have certainly
 23 talked to Jane Doe 4. She is one of your best friends,
 24 right?
 25 A. Yes, I talked to her.

1 Q. Let me get back to the police here.
 2 So the police sit and they interview you for
 3 an hour and a half to two hours, and during that, not
 4 only the sworn part of the testimony out of your
 5 statement, but as well you're saying that you lied to
 6 them during part of, part of what you've said, both
 7 sworn and unsworn, and as well you didn't provide them
 8 all the information, right?
 9 A. Yes.
 10 Q. Now, you filed your lawsuit in this case
 11 against Mr. Epstein and you are seeking, at least your
 12 lawyers are asking in part of the complaint for
 13 \$50 million. Are you aware of that?
 14 A. No, my lawyers take care of all that.
 15 Q. All right. Let me show you I'll mark as
 16 Exhibit 1.
 17 (The document was marked Defendant's
 18 Exhibit 1 for identification.)
 19 BY MR. CRITTON:
 20 Q. Exhibit 1 is the amended complaint that you
 21 filed, that your lawyers -- it's the second complaint
 22 that actually was filed in this action. The original
 23 complaint was filed on September 10th of '08, all right?
 24 A. Uh huh.
 25 Q. Yes?

1 Q. And from my recollection of Jane Doe 4's
 2 deposition is you guys talk almost every day?
 3 MR. HOROWITZ: I'm sorry, are we talking about
 4 in preparation for her depo?
 5 MR. CRITTON: Just asking a question.
 6 MR. HOROWITZ: You are moving off topic.
 7 THE WITNESS: We don't talk every day, no, but
 8 we do talk a lot.
 9 BY MR. CRITTON:
 10 Q. Four, five, six times a week?
 11 A. I wouldn't say that much.
 12 Q. How often do you still talk?
 13 A. I talked to her recently when I was in town,
 14 but when I'm in Orlando I don't talk to her every week.
 15 Q. So if I got your phone records, I might find
 16 that there are weeks or two weeks at a time that neither
 17 one of you are speaking with anyone -- with each other,
 18 I'm sorry.
 19 A. Yes.
 20 Q. All right. Are you aware that Jane Doe 4 gave
 21 a deposition in this case?
 22 A. Yes.
 23 Q. And you have talked to her about her
 24 deposition, haven't you?
 25 A. Yes.

1 A. Yes.
 2 Q. All right. So between the time that the
 3 lawsuit was filed on September -- let me strike that --
 4 that you gave a statement to the police officers under
 5 which you, about which you've admitted you did not tell
 6 the truth on October 4, 2005, up until three years
 7 later -- almost three years later, September 10th of
 8 '08, did you recontact the police and tell the police
 9 that you had not told them the truth? In fact, you had
 10 lied to them and withheld information?
 11 A. I told the FBI that when they came up to visit
 12 me in Orlando.
 13 Q. That wasn't my question.
 14 MR. HOROWITZ: Form.
 15 BY MR. CRITTON:
 16 Q. My question was did you talk to the Palm Beach
 17 police department --
 18 A. I never talked to them after that.
 19 Q. I need to finish the question.
 20 A. I'm sorry.
 21 Q. -- from the time that you first spoke with
 22 them on October 4th of 2005 up until the time that the
 23 complaint was filed, that is, to bring this lawsuit
 24 seeking damages in excess of \$50 million against
 25 Mr. Epstein, did you ever call or recontact the Palm

1 Beach Police Department and tell them what happened in
2 terms of your interview; that is, that you didn't tell
3 them the truth, you lied to them?

4 MR. HOROWITZ: Object to the form.

5 THE WITNESS: No.

6 BY MR. CRITTON:

7 Q. Why not?

8 A. Well, because they never called me back to ask
9 me any more questions and I tried to move on from
10 everything. I was in school. I was trying to, I was
11 scared about everything that was going on with the media
12 and all my friends, and I didn't want to say anything
13 until I knew exactly what was going on and it was safe
14 for me to say everything and I wasn't going to get in
15 trouble.

16 Q. Well, why would you think you would get in
17 trouble? I mean if you didn't hesitate to lie to the
18 Palm Beach Police Department, what trouble did you think
19 you were going to get in?

20 MR. HOROWITZ: Form.

21 THE WITNESS: I had no idea. I just, I didn't
22 really know at the time. I was just scared.

23 BY MR. CRITTON:

24 Q. Well, you knew that perjury was a crime back
25 then, didn't you?

1 MR. HOROWITZ: Form.

2 BY MR. CRITTON:

3 Q. To lie to a police officer under oath?

4 A. Yes. I also knew what Jeffrey did was a
5 crime, but I mean --

6 Q. I'm not talking about Jeffrey. Go ahead,
7 finish your answer.

8 Again, I'm interested in specific answers to
9 questions, and I'm going to have to move to strike and
10 re-ask you the question. So I know that you may have
11 some things that you want to add on. Your lawyer can
12 certainly come back and cover that, but if you can focus
13 on my question, this goes a lot faster, but you can
14 answer anything the way you want.

15 My question is with regard to the police
16 officers, you knew, you knew that telling them a lie was
17 a crime, correct?

18 MR. HOROWITZ: Form. Object to the form.

19 This is the third time you've asked the question,
20 at least.

21 THE WITNESS: Yeah, I already told you.

22 BY MR. CRITTON:

23 Q. Yes?

24 A. Yes.

25 Q. Okay. So you weren't too scared or confused

1 to lie to the police officers, were you?

2 MR. HOROWITZ: Form.

3 THE WITNESS: Actually, I was scared and
4 confused. That is why I lied to them.

5 BY MR. CRITTON:

6 Q. All right. So what were you scared and
7 confused about?

8 A. I was scared because I knew what happened with
9 Jeffrey and I knew that was wrong and I, I knew that he
10 was possibly going to get in trouble, and I didn't know
11 if I was going to get in trouble for going there for
12 what happened.

13 So I mean I was mainly scared about that. I
14 was scared about my parents finding out. Just
15 everything going on with what happened, I was scared
16 about and confused about.

17 Q. Okay. When was the last time you were at
18 Mr. Epstein's home, that you claim you were at
19 Mr. Epstein's home?

20 A. I'm pretty sure it was the end of my junior
21 year of high school.

22 Q. Which would have been what?

23 A. It would have been 2004, I believe.

24 Q. Okay. And that was the last time you were
25 there, so it would have been what, approximately May of

1 2004?

2 A. I don't remember exact dates, but I just
3 believe it was the end of my junior year, so probably
4 around May or June.

5 Q. 2004?

6 A. Yes.

7 Q. Not 2005?

8 A. I don't believe I went in 2005

9 Q. When did you graduate from [REDACTED]?

10 A. 2005.

11 Q. All right. So the end of your -- so your
12 senior year would have been approximately August of '04
13 through May of '05?

14 A. Yes.

15 Q. So where your Exhibit 1, the complaint alleges
16 that you first went to Mr. Epstein's home when you were
17 16 years old and you continued to go over a period of
18 one and a half to two years, that's false; is that
19 correct?

20 MR. HOROWITZ: Form.

21 THE WITNESS: I believe so.

22 BY MR. CRITTON:

23 Q. I'm sorry?

24 A. I believe so.

25 Q. So over what period of time, when do you think

1 you first went to Mr. Epstein's home?
 2 A. I believe I went the end of my sophomore year
 3 till about the end of my junior year. I'm not sure if
 4 it was the beginning or the end of my sophomore year.
 5 Somewhere around there.
 6 Q. Well, you told the police that you were
 7 approximately 17 when you first went to Mr. Epstein's
 8 home, didn't you?
 9 A. I don't exactly remember what, when I said
 10 that, I first told them I went.
 11 Q. If I asked you to assume that the police
 12 report reflects that the statement that you gave to
 13 them, that you were there when you were 17 years old,
 14 all right?
 15 A. Okay.
 16 Q. If you were 17 years old and you were born in,
 17 let's see, [REDACTED], so it would have been
 18 approximately June, the end of June of 2004, correct,
 19 that you first went there?
 20 MR. HOROWITZ: Form.
 21 THE WITNESS: I, I don't exactly know, to be
 22 honest with you.
 23 BY MR. CRITTON:
 24 Q. You mean when you first went to Mr. Epstein's?
 25 A. I can't put a date on it. I just remember it

1 BY MR. CRITTON:
 2 Q. -- to the police officers?
 3 MR. HOROWITZ: Form.
 4 BY MR. CRITTON:
 5 Q. Whether you were scared or confused at that
 6 time, you probably would have given them at least your
 7 accurate age when you first went to Mr. Epstein's?
 8 MR. HOROWITZ: Form.
 9 THE WITNESS: I may have said it because I was
 10 scared and I didn't want to them to think I
 11 actually went that long, or I don't know why I said
 12 it. I honestly don't know.
 13 BY MR. CRITTON:
 14 Q. And maybe it was the truth at the time?
 15 MR. HOROWITZ: Form.
 16 THE WITNESS: I mean I really don't know.
 17 BY MR. CRITTON:
 18 Q. So it may have been the truth, it may not have
 19 been the truth; even today you don't know, correct,
 20 whether you were 17 when you first went to
 21 Mr. Epstein's?
 22 A. I believe I was 16, because I believe it was
 23 the end of my sophomore year. So I at least think I was
 24 16.
 25 Q. So you are meeting with two police officers

1 was my sophomore year to my junior year.
 2 Q. When you gave a statement to the police on
 3 October 4, 2005, whether you were 16 or 17, what
 4 difference would it have made to the police officers?
 5 Why would being scared or confused, why would you lie
 6 about your age when you first went to Mr. Epstein's?
 7 MR. HOROWITZ: Form.
 8 THE WITNESS: I don't know.
 9 BY MR. CRITTON:
 10 Q. Maybe in fact --
 11 A. I mean I did go when I was 17 too, so I may
 12 have just said 17, I don't really know.
 13 Q. Well, you were 18 -- again, would you agree
 14 with me that your recollection of the events involving
 15 Mr. Epstein would have been better in October of '05
 16 than it is at the current time?
 17 MR. HOROWITZ: Form.
 18 THE WITNESS: Yes.
 19 BY MR. CRITTON:
 20 Q. And if you told the police officers you were
 21 17 when you first went to Mr. Epstein's home, would you
 22 agree with me that that, there would have been no reason
 23 for you to lie about your age at that time --
 24 MR. HOROWITZ: Form.
 25

1 from the Town of Palm Beach in basically a secure
 2 environment, nothing can happen to you there. You told
 3 them that you were 17 years old when you first went to
 4 Mr. Epstein's.
 5 Now that you are seeking \$50 million in a
 6 lawsuit that was filed on September 10 of '08, now all
 7 of a sudden maybe you were 16? Is that your testimony?
 8 MR. HOROWITZ: Let me object to form. You are
 9 mischaracterizing the testimony.
 10 BY MR. CRITTON:
 11 Q. You can go ahead and answer, ma'am.
 12 A. Well, I told you that I didn't tell them the
 13 complete truth. So what would it matter if I told them
 14 I was 17 or 16, when I already told you I didn't tell
 15 them the complete truth and I didn't tell them
 16 everything that happened?
 17 Q. Well, again, my point is merely is --
 18 A. I understand.
 19 Q. I want you to confirm that you didn't even
 20 tell them the correct age, or at least your position is
 21 you may have lied to the police officers even about the
 22 age when you first went to Mr. Epstein's house?
 23 A. I believe the only reason I would have lied
 24 about my age, because I was scared and I didn't want
 25 them obviously when I was 16 to think that I went there

1 as well as 17 and if I didn't really want to be involved
2 in it, so maybe that's why I said I was 17. I don't
3 remember that far back what I was thinking.

4 Q. Okay. I understand that. But in fact it
5 could have been true that the first time you went to
6 Mr. Epstein's house you were 17 years old, correct?

7 MR. HOROWITZ: Form.

8 THE WITNESS: No, I remember going around the
9 end of my sophomore year.

10 BY MR. CRITTON:

11 Q. Give me your best exact date when you first
12 went to Mr. Epstein's home.

13 A. I remember [REDACTED] was in my gym class and she
14 asked me to go, and I'm almost positive that was my
15 towards the end of my sophomore year. She was in my gym
16 class.

17 Q. That takes you now to your sophomore year?

18 A. Yes.

19 Q. Okay.

20 A. Yes.

21 Q. Which would have been when?

22 A. When I was 16.

23 Q. You were a senior -- let's just get the dates
24 right. You were senior as of August of '05 -- I'm
25 sorry, of '04, correct?

1 Q. So now your testimony is, also under oath, is
2 we started maybe it was in your junior year. You told
3 the police it was when you were 17, which would have put
4 it in your senior year or just before the start of your
5 senior year in 2005.

6 And now your testimony is it may have been in
7 your sophomore year, is that correct?

8 A. I'm not trying to lie or mislead you. I
9 honestly can't remember if it was my sophomore or my
10 junior year. I wasn't going by age or anything. I just
11 could not remember what year I started going.

12 Q. All right. At least for today's deposition
13 under oath, tell me what your position is as to when you
14 went to Mr. Epstein's home. Now I've got senior year,
15 junior or sophomore year, so my question --

16 A. It wasn't my senior year. I don't believe I
17 remember going my senior year, so I'm pretty sure it was
18 my sophomore year and then into my junior year.

19 Q. All right. Give me an approximate time. If
20 you are now claiming it's in your sophomore year, give
21 me an approximate date when [REDACTED] first approached you.

22 A. I believe it was towards the end of my
23 sophomore year.

24 Q. We're talking about April, May?

25 A. The end. I really don't -- I can't answer

1 A. Yes.

2 Q. And as of August of '04, you would have been
3 17 years old as a senior; is that correct?

4 A. Yes.

5 Q. Okay. So as a junior, you would have been 16
6 years old and you would have started in August of '03 to
7 '04, right?

8 A. Yes.

9 Q. If '05, 04-05 is your senior year and you were
10 17 during your whole senior year; is that correct?

11 A. Yes.

12 Q. All right. So you would have been 16 during
13 your entire junior year?

14 A. Uh huh.

15 Q. Yes?

16 A. Yes.

17 Q. Okay. But you just said [REDACTED] asked you to go
18 to Mr. Epstein's house now when you were in your
19 sophomore year.

20 A. Yes.

21 Q. Okay. So you would have been 15 then?

22 A. I guess so. I wasn't really going by age. I
23 was just trying to remember when she was in my gym
24 class, and I can't remember if it was my sophomore or my
25 junior year.

1 you, because I don't want to tell you something that
2 I -- I just believe it was towards the end of my
3 sophomore year.

4 Q. If you look at Exhibit 1, paragraph nine says,
5 the last sentence says, "In or about 2004 Jane Doe"--
6 which is you, Jane Doe 7 -- am I saying that right, Jane
7 Doe 7?

8 A. Yes.

9 Q. "then approximately 16 years old, fell into
10 Epstein's trap."

11 Okay, you see that?

12 A. Uh huh.

13 Q. So at least the lawsuit that was filed
14 initially, your amended complaint that was filed on
15 September -- I'm sorry, February 27 of '09, it alleges
16 sometime in 2004, right? Which would have had to have
17 been after your sophomore year, but into your junior
18 year, correct?

19 A. Yes.

20 Q. So you are saying now that that complaint is
21 wrong? At least based on what you're claiming to be the
22 truth today; is that right?

23 A. I told you I couldn't remember correctly if it
24 was my sophomore or my junior year when she was in my
25 gym class, so --

1 Q. So now you are saying it really could be the
2 junior year?
3 A. I really, I really don't know. I can't
4 remember. I just remember her being in my gym class
5 asking me to go.
6 Q. So maybe it's '03, maybe it's '04, maybe it's
7 '05, you are just not sure?
8 MR. HOROWITZ: Form.
9 THE WITNESS: It's not '05. It was either
10 2003, I'm pretty sure it was 2003 -- or 2002 or
11 2003 through 2004. It wasn't 2005 at all.
12 BY MR. CRITTON:
13 Q. All right. Let me show you what I'll mark as
14 Exhibit 2.
15 (The document was marked Defendant's Exhibit
16 2 for identification.)
17 MR. CRITTON: Here's extra copy for you.
18 MR. HOROWITZ: Okay.
19 BY MR. CRITTON:
20 Q. These are interrogatory answers that you
21 signed on January 23, 2008. Do you see that?
22 A. Yes.
23 Q. Would you go to the second, go to the
24 second-to-last page.
25 MR. HOROWITZ: What, is there a question?

1 MR. CRITTON: Yes, go to the last page,
2 second to last page.
3 BY MR. CRITTON:
4 Q. There is a signature there that says -- go to
5 the second-to-last page, please, ma'am. These are
6 plaintiff Jane Doe 7's, Ms. Jane Doe 7's answers to
7 first set or first interrogatories, correct?
8 A. Yes.
9 Q. All right. And you see there is a
10 verification that says Jane Doe 7, "being duly sworn,
11 deposes and says that the foregoing answers to
12 interrogatories are true and correct to the best of her
13 knowledge, information and belief."
14 That's your signature, is it not?
15 A. Yes.
16 Q. It reflects "Sworn and subscribed to the 23rd
17 day of January 2008." In fact, I think it's 2009, based
18 upon the certificate page, because you didn't have a
19 lawsuit as of January of 2008. So I'm sure it was that
20 same January issue that a lot of people have, so let's
21 assume, we'll agree that it was January 23, 2009,
22 correct?
23 A. Yes.
24 Q. All right. So then if you go to Question
25 No. 15, again you're under oath again and swearing to

1 these interrogatories and you understood that, true?
2 A. Uh huh, yes.
3 Q. All right. And it says, the question is "List
4 all dates you allege you were at Mr. Epstein's home in
5 Florida. Include the date, time arrived and left, the
6 name of anyone else who went with you to the home, when
7 you were there, the time spent with Mr. Epstein, and the
8 names and addresses of individuals who were present in
9 the house with Mr. Epstein and you."
10 Okay. And why don't you read for the ladies
11 and gentlemen of the jury what your answer was, at least
12 the first part of the answer.
13 A. "Plaintiff went to the defendant's estate
14 approximately eight to ten times during her junior and
15 senior years of high school, from 2004 to 2005."
16 Q. All right. So you already told us that you
17 lied to the police about certain aspects of your
18 statement. Are you now telling us that on January 23rd
19 of 2009 when you answered these interrogatories you were
20 again lying about the dates you were at Mr. Epstein's
21 home?
22 MR. HOROWITZ: Form.
23 THE WITNESS: I wasn't lying at all. I, I
24 told you before I don't exactly remember the exact
25 dates.

1 BY MR. CRITTON:
2 Q. Well, you're giving this information --
3 A. I know I went my junior year. I don't
4 remember if it started my sophomore -- I think it ended
5 my senior. I just, I'm telling the truth. I don't know
6 exact dates. It's hard for me to remember.
7 Q. Do you even know what my question was?
8 A. Yes, I did.
9 Q. You let me ask one word and then you just
10 started talking.
11 A. I'm sorry, you are just trying to make me out
12 to look like a liar when I told you I don't remember
13 exact dates.
14 Q. I'll make it very clear. I'm not trying to
15 make you out as anything, all right? The record is
16 going to speak for itself whether you are telling the
17 truth or not. Somebody else can judge that. That's not
18 my job.
19 All I'm saying is at least in your answers to
20 interrogatories, and I assume you completed these in
21 conjunction with your attorneys, right? You had the
22 opportunity to sit with your attorneys?
23 A. Yes.
24 Q. In fact, you sat with Jessica Arbour at the
25 time, who is now an attorney with Mermelstein &

1 Horowitz, correct?
 2 A. Uh huh.
 3 Q. Yes?
 4 A. Yes.
 5 Q. And you understood in answering these
 6 questions that you were to answer them to the best of
 7 your ability, because you would be sworn that they were
 8 truthful, correct?
 9 A. Yes.
 10 Q. All right. So now we've got -- see if we can
 11 sort through this.
 12 Under oath, you told the police officers you
 13 were 17 when you came to Mr. Epstein's, which would have
 14 had to have been in '04, that is after June 30th of
 15 2004, which would have put you after completion of your
 16 junior year and into your senior year, right? That's at
 17 least what you told the police?
 18 A. Yes.
 19 Q. In your answers to interrogatories you say you
 20 went to Mr. Epstein's home 2004 and 2005, during both
 21 your junior and senior years, correct?
 22 A. Yes.
 23 Q. And you've told us under oath here today that
 24 you may have gone to Mr. Epstein's when you were 15 as a
 25 sophomore, you may have gone when you were 16 as a

1 junior, but you don't know?
 2 A. I think I put this because --
 3 Q. No, I'm not asking why you put that.
 4 My question to you is that's what you've told
 5 us at least today?
 6 MR. HOROWITZ: Form.
 7 THE WITNESS: I put this because I was sure
 8 that I went my junior year. I didn't remember if I
 9 went my senior year and I didn't remember if I went
 10 my sophomore year at all. Maybe towards the end,
 11 like I told you earlier.
 12 But I definitely remember going my junior
 13 year. So that's maybe why I left out the sophomore
 14 year. I don't remember if I went my sophomore
 15 year. I'm not saying that I did. I don't
 16 remember.
 17 MR. CRITTON: Let me move to strike as
 18 nonresponsive.
 19 Would you read the question back to her,
 20 please.
 21 (A portion of the record was read by the
 22 reporter.)
 23 BY MR. CRITTON:
 24 Q. Is that correct?
 25 MR. HOROWITZ: Form.

1 THE WITNESS: Can you read that one more time,
 2 please? Sorry.
 3 (A portion of the record was read by the
 4 reporter.)
 5 THE WITNESS: I definitely went when I was a
 6 junior. I wasn't sure if I went when I was a
 7 sophomore, so yes.
 8 BY MR. CRITTON:
 9 Q. So now you were a junior. At least what
 10 you're saying today, separate and apart from what you
 11 told the police officer, separate and apart from what
 12 you put in your answers to interrogatories, separate and
 13 apart from what you have previously testified today,
 14 it's now your testimony under oath again that you went
 15 sometime in your junior year, which would have been
 16 what, in '04?
 17 A. Yes.
 18 Q. And your best recollection as to when you went
 19 would have been when?
 20 MR. HOROWITZ: Which visit are you talking
 21 about?
 22 MR. CRITTON: First went to Mr. Epstein.
 23 MR. HOROWITZ: First went.
 24 THE WITNESS: First was with [REDACTED]
 25

1 BY MR. CRITTON:
 2 Q. I understand that's your testimony. Datewise,
 3 sometime in April or May of 2004?
 4 MR. HOROWITZ: No, she said end of her
 5 sophomore is her best --
 6 MR. CRITTON: No, she just said junior. Well,
 7 wait a minute, let's clear it up, Mr. Horowitz.
 8 Let's go back and read it.
 9 (A portion of the record was read by the
 10 reporter.)
 11 MR. HOROWITZ: Right. You are talking about
 12 the first visit there. You are talking about --
 13 MR. CRITTON: No, I'm talking about the first
 14 visit.
 15 MR. HOROWITZ: Okay.
 16 MR. CRITTON: She said junior year and then
 17 you said no, sophomore.
 18 MR. HOROWITZ: No, but the question wasn't
 19 about -- I'm not testifying.
 20 MR. CRITTON: I'll clear it up again.
 21 MR. HOROWITZ: Please clear it up.
 22 MR. CRITTON: Because she's all over the
 23 world. She can give us like 40 years here.
 24 BY MR. CRITTON:
 25 Q. My question to you is is it your position that

1 you first went to Mr. Epstein's home in the latter part
2 of your junior year, which would have been sometime
3 April, May of 2004?

4 A. When I first went there?

5 Q. Yes, ma'am.

6 A. No.

7 Q. Okay, what is it now?

8 MR. HOROWITZ: Form.

9 THE WITNESS: Why did you try to trick me like
10 that when I told you --

11 BY MR. CRITTON:

12 Q. I'm not trying to trick you. You have said
13 about 19 different things. I'm going to ask a clean
14 question so maybe we can get a clean answer from you
15 here.

16 My question to you is what is your position as
17 to when you first went to Mr. Epstein's home?

18 A. My position is I believe it was towards the
19 end of my sophomore year or the beginning of my junior
20 year. I don't really remember the exact dates.

21 Q. If it was the end of your sophomore year, that
22 would have put it sometime in 2003, right?

23 A. Yes.

24 Q. Okay. If it was the beginning of your junior
25 year, it still would have been sometime in '03, but you

1 Q. Okay, I'm asking you. I'm don't want to trick
2 you here. I just want to make certain that you
3 understand --

4 A. No, that's fine. I just wish we could move
5 past this.

6 Q. Then in paragraph 14 the allegation is that
7 you -- and I'm paraphrasing -- is that you returned on
8 many occasions to Mr. Epstein's home over a period of 18
9 to 24 months, right?

10 A. Yes.

11 Q. All right. So 18 to 24 months would be
12 another year and a half to two years, which would now
13 be, based on what you are testifying today, would have
14 been sometime in '03 through sometime in '05, right?

15 A. I suppose, yes.

16 Q. Well, two years on to '03 takes me to '05,
17 right? I'm just doing the math, ma'am.

18 A. I honestly don't remember the dates and I
19 don't remember how many months exactly. I don't -- but
20 if you go by this, then yes.

21 Q. Okay.

22 A. I don't remember, I don't recall dates, and
23 I'm sorry, like I don't remember the first time I went
24 there, I don't remember the date when I first went
25 there. I don't remember the month. I just remember

1 would have now been 16 years old, correct?

2 A. Yes.

3 Q. Whereas if it was the latter part of your
4 sophomore year, you would have been 15?

5 A. Yes.

6 Q. So the complaint, Exhibit 1, where it says you
7 first went in 2004, that's not true, correct?

8 MR. HOROWITZ: Object to form.

9 BY MR. CRITTON:

10 Q. Well, let me go back to it again.

11 Paragraph nine where it says "In or about 2004
12 Jane Doe, then approximately 16 years old, fell into
13 Mr. Epstein's -- fell into Epstein's trap and became one
14 of his victims." Okay?

15 The first time you were there now you are
16 saying would have been in '03?

17 MR. HOROWITZ: Form.

18 BY MR. CRITTON:

19 Q. Right?

20 A. The end of my sophomore year, that's 2003,
21 yes.

22 Q. You tell me, okay? Please. Don't let me lead
23 you in that. You tell me what the end of your sophomore
24 year would have been, what year.

25 A. Yes, if it was the end of 2003.

1 being in gym class with [REDACTED] was the first time.

2 Q. Then if I go to your answers to
3 interrogatories, which are Exhibit 2, question 15, where
4 it says "Plaintiff" -- this is your answer under oath,
5 okay? There is no lawyer.

6 In fact, the only lawyers that were there were
7 Ms. Arbour, paralegal and now lawyer. So you are
8 certainly not -- well, let me strike that.

9 When you answered these interrogatories, you
10 did them in conjunction as reflected in answer number
11 one with Ms. Arbour, who was a paralegal for the
12 Mermelstein & Horowitz firm, correct?

13 A. Yes.

14 Q. You weren't scared, were you?

15 A. No.

16 Q. You weren't dazed?

17 A. No.

18 Q. You weren't confused?

19 A. No.

20 Q. You had good presence of mind, you had the
21 ability to think about the question as long as you
22 wanted to, true?

23 MR. HOROWITZ: Form.

24 THE WITNESS: Yes.
25

1 BY MR. CRITTON:
 2 Q. All right. And at least in this answer under
 3 oath you said, "Plaintiff went to defendant's estate
 4 approximately eight to ten times during her junior and
 5 senior years of high school, from 2004 and 2005."
 6 Right?
 7 A. Uh huh.
 8 Q. Yes?
 9 A. Yes.
 10 Q. Okay. Now you said you also gave -- well, let
 11 me strike that. Let me stay with the police statement
 12 that you gave a minute.
 13 Now the first time you went to Mr. Epstein's
 14 home, you went with [REDACTED] is that true?
 15 A. Yes.
 16 Q. Okay. And did you -- and I'm going to come
 17 back and ask a lot more questions about this. I just
 18 want to get what you told the Palm Beach Police
 19 Department under oath.
 20 You told them that you went with [REDACTED] Did you
 21 go upstairs on the very first visit to Mr. Epstein's
 22 home?
 23 MR. HOROWITZ: I'm sorry, are you asking
 24 her --
 25 MR. CRITTON: What she told the police.

1 Q. And now you are saying that may not be right,
 2 I may have lied to them, right?
 3 A. Yes.
 4 Q. All right. So you told them you went to
 5 Mr. Epstein's home the first time with [REDACTED]
 6 Was that true?
 7 A. Yes.
 8 Q. Why did you tell them that?
 9 A. Because that was the first time I went.
 10 Q. But why did you, if you were confused and
 11 scared, why didn't you just tell the police you never
 12 went to Mr. Epstein's home if you didn't want to get in
 13 trouble?
 14 If you were one of the first people that they
 15 were talking to and no one had clued you in that they
 16 were talking to anyone else, why didn't you just tell
 17 the police officers if you were going to lie, "I never
 18 went to Epstein's house, I don't know what you are
 19 talking about"?
 20 MR. HOROWITZ: Form.
 21 THE WITNESS: Because they pretty much sounded
 22 like they knew that I already went, from what they
 23 told me. And they said they have records of my car
 24 being there, and they pretty much said they already
 25 knew I went. So that is why I told them, you know,

1 MR. HOROWITZ: Do you understand he's asking
 2 what you told the police?
 3 BY MR. CRITTON:
 4 Q. The Palm Beach Police Department. And again,
 5 let's put it back in the scenario that you told me.
 6 You get a call from your mom, the Palm Beach
 7 police are there to interview you. You drive home for
 8 five minutes. The four of you, including your mother,
 9 are outside talking. They want to ask questions about
 10 Mr. Epstein.
 11 You make the decision to send Mom inside,
 12 correct?
 13 A. Yes.
 14 Q. Okay. That's where we are. Do the three of
 15 you sit down?
 16 A. Yes.
 17 Q. So you are sitting down with the other two
 18 police officers, and as they are taking your sworn
 19 statement and talking to you, you told them -- they
 20 asked you when is the first time you went to
 21 Mr. Epstein's house, correct?
 22 A. Yes.
 23 Q. They ask you how old you were, and at least
 24 they reflect that you told them 17, correct?
 25 A. Yes.

1 that the first time that I went with [REDACTED]
 2 And I just didn't tell them everything about
 3 when I went the other times.
 4 BY MR. CRITTON:
 5 Q. So you actually drove your car to
 6 Mr. Epstein's?
 7 A. I don't remember if I drove the first time,
 8 no.
 9 Q. I'm not saying the first time, but you
 10 actually drove to Mr. Epstein's on your own?
 11 A. Yes.
 12 Q. So you had to actually get in your car, make a
 13 decision to go to Mr. Epstein's, and you went by
 14 yourself on occasions?
 15 A. I don't remember if I ever went by myself, but
 16 yes. Usually [REDACTED] was with me.
 17 Q. Usually. Always?
 18 A. Not always.
 19 Q. Okay. By the way, did you really go eight to
 20 ten times to Mr. Epstein's house?
 21 A. Yes.
 22 Q. Okay.
 23 A. That I remember.
 24 Q. At least in the interrogatory, Exhibit 2 that
 25 we talked about, question 15, you are saying it's wrong

1 with regard to 2004-2005 time period, but you are saying
2 at least it's right with regard to the number of times
3 you went; is that correct?

4 A. I said I don't remember the exact dates and
5 years.

6 Q. Well, if it's 2004 and 2005, it would be at
7 the end of your junior year, latter part of your junior
8 year into your senior year, correct?

9 A. Yes.

10 Q. All right. So, and I thought you told me five
11 minutes ago that that time period was not correct, or
12 now you are not so sure again.

13 MR. HOROWITZ: Form.

14 THE WITNESS: I told you that I didn't
15 remember the dates. And I do remember going there
16 from eight to ten times, but I don't remember the
17 exact dates of when I started going there.

18 BY MR. CRITTON:

19 Q. Okay. That's my question to you is you don't
20 remember the exact dates, but at least that part of the
21 interrogatory where it says the number of times you
22 went, you think that's maybe accurate?

23 A. Yes, it is accurate.

24 Q. Eight to ten times, okay. Well, you told the
25 police, the Palm Beach Police Department when you were

1 interviewed that you only went two times, didn't you?

2 A. Yes, I already admitted that I did not tell
3 them the whole truth.

4 Q. I know. Well, what I'm trying to do is figure
5 out how many things you told them that may have been
6 true, that is -- well, let me strike that.

7 I'm trying to find out now from looking at the
8 police report what you told them may have been true
9 versus what was not true or might be a half truth or
10 something that you omitted. That's what I'm trying to
11 do here, okay?

12 A. Okay.

13 Q. Do you understand that?

14 A. Yes.

15 Q. All right. So we know it's your testimony now
16 that you lied to them about your age. Did you lie to
17 them about the number of times you went to Mr. Epstein's
18 home, they being the Palm Beach Police Department?

19 A. I told you I didn't tell them all the times I
20 went. I only told them two.

21 Q. Well, you told them you went only two times?

22 A. Yes.

23 Q. Is that a lie?

24 A. I told you yes. I told you at the very
25 beginning.

1 Q. The first time you went, you went with [REDACTED]
2 right?

3 A. Yes.

4 Q. Let me get back to my question. They seemed
5 to know that you were at Mr. Epstein's home, that is,
6 the police officers?

7 A. Yes.

8 Q. Because they had seen your car there?

9 A. Yes.

10 Q. All right. And so if your car was there, I
11 assume you don't let other people drive your car
12 generally?

13 Let me ask this question. Did you ever let
14 any other person drive your car to Mr. Epstein's home?

15 A. No.

16 Q. Okay. So you in each of those instances would
17 have had to make the voluntary decision that you were
18 going to go to Mr. Epstein's home, right?

19 A. Yes.

20 Q. All right. So you told them on the first
21 occasion you went with [REDACTED] right?

22 A. Yes.

23 Q. And what did you tell them who [REDACTED] was?

24 A. She was a friend in high school.

25 Q. All right. So you went with [REDACTED] She was a

1 friend. She was a good friend at the time?

2 A. I don't remember if she was a good friend. I
3 think we were fighting. Me and her like would fight a
4 lot and then make up. So I don't remember if we were
5 good friends at the time or just friends.

6 Q. Okay. Good friend is someone you trust, have
7 almost complete faith in? That's not a play on words
8 with your name, but would you consider a good friend
9 someone that you would feel very comfortable with and
10 you could trust?

11 A. Yes.

12 Q. Okay. And if it was just a friend, maybe you
13 would trust and maybe you wouldn't?

14 A. Yes.

15 Q. So you go with [REDACTED] who you have now
16 described as a friend, someone you might trust or not
17 trust, right?

18 A. Yes.

19 Q. To Mr. Epstein's home. Again, I'm going to
20 get into details later.

21 So you go to Mr. Epstein's home the first
22 time, and what happens, or what did you tell the police,
23 your best recollection?

24 A. I just remember I told them that I went there
25 and I saw the cooks there, I saw [REDACTED].

1 I just remember that I, like I told them how I
2 went upstairs and I did the massage. And I don't think
3 I went into detail with them about what happened.

4 Q. So -- I'm sorry.

5 MR. HOROWITZ: Go ahead.

6 THE WITNESS: I don't remember going into
7 detail with them about what happened.

8 And then I also remember going once with [REDACTED],
9 and I think I told them about that on [REDACTED].

10 Honestly, I don't --

11 BY MR. CRITTON:

12 Q. So I'm clear, at least you told the police
13 officers, your best recollection of what you told the
14 police officers, the first time you went to
15 Mr. Epstein's home, you went there with [REDACTED], you met
16 the cook, you met [REDACTED]?

17 A. Yes.

18 Q. Do you know who [REDACTED] is?

19 A. Yes.

20 Q. Who is [REDACTED]?

21 A. Jeffrey's assistant.

22 Q. And how do you know that?

23 A. Because she is the one that would call me
24 every time she wanted me to come there, and she would
25 always be there doing, making calls. She would call

1 other girls too.

2 So I assume that she was his assistant. She
3 also told me about how to set up the massage table and
4 other things like that.

5 Q. How do you know [REDACTED] called other females?

6 A. I know because they told me.

7 Q. Who is the they?

8 A. Jane Doe 4.

9 Q. Jane Doe 4?

10 A. Uh huh.

11 Q. Yes?

12 A. And L.A., yes.

13 Q. L.A. who?

14 A. L.A.

15 Q. Okay. Jane Doe 4 and L.A., are they still
16 friends of yours?

17 A. Yes.

18 Q. Good friends of yours?

19 A. Jane Doe 4 is, yes.

20 Q. How about L.A., what's her status these days?

21 A. Just a friend.

22 Q. Would it be a correct statement that you have
23 never spoken with Mr. Epstein by phone?

24 A. I don't remember.

25 Q. As you sit here today, have you ever spoken

1 with Jeffrey Epstein by phone?

2 A. I don't remember.

3 Q. Can you cite any instances to me where you
4 think that maybe you spoke with him or you just have no
5 recollection of having spoken with him?

6 A. I don't remember if he ever called me or
7 didn't call me, honestly. I remember talking to Sarah.

8 Q. Have you ever texted Mr. Epstein or has he
9 ever texted you?

10 A. No.

11 Q. Have you ever spoken or communicated through a
12 computer in any way with Mr. Epstein, either he to you
13 or you to him?

14 A. No.

15 Q. Would it be a correct statement that the only
16 conversations that you have ever had with Mr. Epstein
17 would have been at Mr. Epstein's home?

18 MR. HOROWITZ: Form.

19 THE WITNESS: Well, as to what I can remember,
20 yes.

21 BY MR. CRITTON:

22 Q. Well, again, you are here under oath. You
23 knew you were going to be deposed?

24 A. Yes.

25 Q. So at least as you sit here today thinking

1 back over the time that you knew Mr. Epstein, it's your
2 best recollection as you sit here today that you have
3 never spoken with him except at his home; is that true?

4 A. My best recollection, yes.

5 Q. You have never, and would it also be true that
6 you never saw Mr. Epstein other than at his home?

7 A. I saw him on the beach before jogging with
8 [REDACTED] where he came over and said hi to me.

9 Q. Were you on the beach at the time?

10 A. Yes.

11 Q. Who were you there with?

12 A. I forget. Just one of my girlfriends.

13 Q. You used to go to Palm Beach beach, the beach
14 in Palm Beach from time to time?

15 A. Yes.

16 Q. From the time you were a young girl up
17 probably even through now?

18 A. Uh huh, yes.

19 Q. All right. So one time you saw him on the
20 beach with [REDACTED], he said hello to you?

21 A. Yeah, he came over and said hi and asked me
22 how I was. And he just said he was jogging. He had his
23 jogging outfit on.

24 Q. Is that the extent of the conversation?

25 A. From what I can remember. I don't know, it

1 was like a long time ago. I don't --
 2 Q. And you talked to him?
 3 A. Yes.
 4 Q. He said "Hi, how are you?"
 5 A. Uh huh.
 6 Q. Yes?
 7 A. Yes.
 8 Q. And did you, was that after you stopped going
 9 to Mr. Epstein's house or during the time that you were
 10 going to Mr. Epstein's house that you saw him jogging on
 11 the beach?
 12 A. I don't exactly remember when it was. I think
 13 it was when I was still going.
 14 Q. Okay. So the only time that you've ever
 15 spoken with Mr. Epstein outside of his home would have
 16 been the one time you saw him out jogging on the beach
 17 and you were at the beach over in Palm Beach, correct?
 18 MR. HOROWITZ: Form.
 19 THE WITNESS: Yeah, I thought I saw him in Key
 20 West once, but I wasn't sure that was him. But
 21 yeah, other than that, yes.
 22 BY MR. CRITTON:
 23 Q. Okay. You have never traveled with
 24 Mr. Epstein?
 25 A. No.

1 Q. And Mr. Epstein has never flown you or asked
 2 you to travel anyplace, has he, where you traveled?
 3 A. No.
 4 Q. That's correct?
 5 A. Yes.
 6 Q. All right. First time, at least what you told
 7 the police officers, your best recollection is that you
 8 went over there with [REDACTED] you went upstairs, and you
 9 gave Mr. Epstein a massage, correct?
 10 A. Yes.
 11 Q. Okay. And during the course of the massage,
 12 you kept your clothes on, true?
 13 A. I believe that's what I told them.
 14 Q. All right. And you also told the police that
 15 at no time did he try to touch you or did he touch you,
 16 correct?
 17 A. I told them that he did try to touch my butt.
 18 Q. Okay. He did try?
 19 A. Or he did, I think I said.
 20 Q. What's the difference between trying and
 21 touching?
 22 A. I don't exactly remember the words I said. I
 23 think I did tell them that he did.
 24 Q. So it's now your testimony that you recall
 25 telling the Palm Beach Police Department that he did

1 touch your buttocks, correct?
 2 A. Yes.
 3 Q. Okay. And that's all he touched was your
 4 buttocks, correct?
 5 MR. HOROWITZ: Form. Again, you are talking
 6 about the conversation?
 7 BY MR. CRITTON:
 8 Q. Only what you told the Palm Beach police.
 9 A. As to what I can remember, I'm not -- if you
 10 could show me, I don't exactly remember.
 11 Q. I'm asking your best recollection. I'm
 12 looking at the police report.
 13 A. Okay.
 14 Q. Did you also tell the Palm Beach police that
 15 at no time did he touch any of your private areas?
 16 A. I don't remember telling them that he did.
 17 Q. Okay. In fact, you told them he
 18 specifically -- they asked you, did he touch, did he
 19 touch you in your private area, in your vaginal area,
 20 and you said no, correct?
 21 A. Yes.
 22 Q. And they asked you whether he had touched your
 23 breast, and you said no, correct?
 24 A. I don't remember.
 25 Q. Again, whatever ultimately, whatever the

1 statement says, that's what you would have told them.
 2 If I ask you to assume that that's at least
 3 the information that they have is that he did not touch
 4 you in any, quote, unquote, private area, that would be
 5 accurate?
 6 MR. HOROWITZ: Form.
 7 THE WITNESS: Yes.
 8 BY MR. CRITTON:
 9 Q. That's what you had told them?
 10 A. Yes.
 11 Q. And you didn't touch him in any of his private
 12 areas, did you?
 13 MR. HOROWITZ: Form.
 14 THE WITNESS: No.
 15 BY MR. CRITTON:
 16 Q. In fact, in any of the visits you ever went to
 17 Mr. Epstein's home, you never touched him in his genital
 18 area, did you?
 19 A. No.
 20 MR. HOROWITZ: Form. I'm sorry, I'm doing
 21 this to have a clear record, because you seem to be
 22 drifting between --
 23 MR. CRITTON: I'm not drifting. I'm asking
 24 specific questions.
 25 MR. HOROWITZ: I understand, but you are

1 alternating between the conversation versus events.
 2 MR. CRITTON: Is that a form?
 3 MR. HOROWITZ: Yes.
 4 MR. CRITTON: I'm not trying to trick her.
 5 BY MR. CRITTON:
 6 Q. You understand when I said on all of the
 7 visits you went to Mr. Epstein's home, you never touched
 8 his private areas, his genital area, correct?
 9 A. Yes.
 10 Q. Now I'm asking away from the Palm Beach police
 11 statement. You understood that, didn't you?
 12 A. Yes. I did not.
 13 Q. Same questions now.
 14 Now I'm away from the statements you gave
 15 under oath to the Palm Beach Police Department.
 16 At no time did you touch any of his genital
 17 area, correct?
 18 A. Yes.
 19 Q. All right. At no time did you have sexual
 20 intercourse with Mr. Epstein, correct?
 21 A. Yes.
 22 MR. HOROWITZ: Form.
 23 BY MR. CRITTON:
 24 Q. At no time did you have any oral or anal sex
 25 with Mr. Epstein, correct?

1 A. Yes.
 2 Q. At no time did Mr. Epstein in any way
 3 penetrate any portion of your vaginal area, did he?
 4 A. I mean he did touch it and I wouldn't --
 5 penetrate with what?
 6 Q. With either an object or his fingers. At no
 7 time did Mr. Epstein ever penetrate your vagina with
 8 either his fingers or an object, did he?
 9 A. [REDACTED]
 10 MR. HOROWITZ: Let her finish.
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 BY MR. CRITTON:
 15 Q. But you didn't let him, did you?
 16 [REDACTED]
 17 [REDACTED]
 18 Q. He never penetrated, did he?
 19 A. No.
 20 Q. Now back to the police statement or the
 21 statement that you gave to the Palm Beach police. You
 22 told them that you only went to Mr. Epstein's home --
 23 well, let me strike that. Let me stay with the first
 24 occasion.
 25 On the first occasion did you tell the police

1 that you received any money for having given Mr. Epstein
 2 a massage?
 3 A. I believe I told them I did.
 4 Q. Okay. So you got money for doing a massage,
 5 although there was nothing of a sexual nature that was
 6 involved at all, at least what you told the Palm Beach
 7 police, correct?
 8 A. Yes.
 9 Q. Had you ever given a massage for money before?
 10 A. No.
 11 Q. Had you given massages before?
 12 A. Just to friends.
 13 Q. To boys and girls, males and females?
 14 A. Yes.
 15 Q. Did you ever receive money for giving a
 16 massage before?
 17 A. No.
 18 Q. And how much money did you get from
 19 Mr. Epstein?
 20 A. \$200.
 21 Q. Did he hand it to you?
 22 A. Yes.
 23 Q. After the first occasion -- and again, I'm
 24 back to what you told the Palm Beach police.
 25 On the second occasion what did you tell the,

1 that is, the second time you went to Mr. Epstein's, I
 2 think you said you told the Palm Beach Police Department
 3 you went either with [REDACTED] or [REDACTED]
 4 A. [REDACTED]
 5 Q. [REDACTED]
 6 A. Well, yes.
 7 Q. You either went with [REDACTED] or [REDACTED] right?
 8 A. Yes.
 9 Q. How did you get to Mr. Epstein's? What did
 10 you tell the police? Getting back to what you told the
 11 police.
 12 A. I don't exactly remember. I think I said I
 13 drove there.
 14 Q. Okay. Did [REDACTED] go the second time?
 15 A. I think [REDACTED] went, yes. I don't remember.
 16 Q. So it would have been the three of you, [REDACTED]
 17 you -- well, you are not sure, but you would have gone
 18 and either [REDACTED] or [REDACTED] right?
 19 A. Yes.
 20 Q. And maybe [REDACTED]
 21 A. Yes.
 22 Q. And you think you drove?
 23 MR. HOROWITZ: Form.
 24 THE WITNESS: I don't remember.
 25

1 BY MR. CRITTON:

2 Q. And when you went the second time, what was,
3 at least what did you tell the police you were there for
4 the second time?

5 A. I believe they asked me if I brought anybody
6 there. And I believe I said I brought one of the [REDACTED]
7 [REDACTED]

8 Q. There is two?

9 A. Yes.

10 Q. [REDACTED]

11 A. [REDACTED]

12 Q. Were they both friends of yours?

13 A. Yes.

14 Q. Good friends or just friends?

15 A. Friends.

16 Q. Okay. And how about [REDACTED] was she a friend or
17 a good friend?

18 A. A friend.

19 Q. The police asked you if you brought somebody,
20 and you said yes, I brought either [REDACTED],
21 correct?

22 A. Yes.

23 Q. And did the police ask you why you brought
24 somebody?

25 A. Yes. They asked me if I had brought somebody

1 and got paid for bringing somebody.

2 Q. And did you, did you in fact get paid for
3 having brought someone?

4 A. Yes.

5 Q. Okay. And what were you getting paid for?

6 A. Bringing somebody there.

7 Q. Okay. Did the police ask you if you were
8 procuring people for giving a massage?

9 A. Can you say that again?

10 Q. Soliciting. Were you procuring someone? Were
11 you trying to get, hire someone or obtain someone --

12 A. I wasn't trying to hire them. I just told
13 them about it and then they would go there and I mean --
14 yeah, so they never said hiring.

15 Q. Who is they?

16 A. The police never used that term.

17 Q. Did the police ever ask you if you knew what a
18 pimp was?

19 A. No.

20 Q. Okay. Did you know back then what a pimp was?

21 A. Not really.

22 Q. What do you think a pimp is?

23 A. I really hope you don't make this connection
24 to me, but I know what a pimp is and --

25 Q. Tell me what you think a pimp is.

1 A. Somebody that gets paid for sex, I guess. I
2 don't know.

3 Q. What's the difference between a pimp and a
4 prostitute, in your mind?

5 A. A pimp brings somebody to have sex with
6 somebody else.

7 Q. And get paid, and gets paid for it?

8 A. Yes.

9 Q. And did you ever consider yourself to be a
10 pimp?

11 A. No, not at all.

12 Q. Did you ever bring --

13 A. No, absolutely not.

14 Q. Did you ever bring someone to Mr. Epstein's
15 house so that they --

16 A. If I ever would have thought --

17 MR. HOROWITZ: Wait for the question.

18 MR. CRITTON: Go ahead.

19 MR. HOROWITZ: No, there is no question
20 pending.

21 BY MR. CRITTON:

22 Q. Tell me what you think.

23 MR. HOROWITZ: About what?

24 MR. CRITTON: What you were just going to
25 give. Don't interrupt her.

1 MR. HOROWITZ: There is no question pending.

2 MR. CRITTON: I'm asking a question. Don't
3 interrupt her when she is answering. Wait a
4 minute, let me just finish and then you can give
5 your little speech too.

6 You haven't had any problem letting her give
7 an answer and extending her answer when it has
8 nothing to do with anything. Now she is giving an
9 answer and you don't like it, so you are chopping
10 her off.

11 MR. HOROWITZ: No, no, I don't even know what
12 she's going to say.

13 MR. CRITTON: Exactly, so let her talk. She's
14 responding to my question.

15 MR. HOROWITZ: No, the way a deposition works
16 is there is questions and answers. Sometimes the
17 questions go in different directions, sometimes the
18 answers go in different directions, but at no point
19 should somebody be answering something when there
20 is no question pending.

21 MR. CRITTON: Rachel, would you read back the
22 question and answer.

23 THE VIDEOGRAPHER: Can we take a break soon?

24 MR. CRITTON: I want to -- how much time do we
25 have?

1 (A portion of the record was read by the
2 reporter.)

3 BY MR. CRITTON:

4 Q. Tell me what you thought. What were you going
5 to say to me about if you ever thought what?

6 A. I don't really -- I mean I think we should
7 just move on. I don't --

8 Q. So you don't remember what your thought was
9 now?

10 A. I mean I don't want you to try to change it
11 around to make me look --

12 Q. Not trying to change it. I'm just trying to
13 get what you were going to say.

14 A. If I ever would have thought that Jeffrey
15 would have done half the things I know that he did now
16 to people, I never would have asked anybody to go there.

17 MR. CRITTON: Okay. Let's save that thought
18 and take a break.

19 THE VIDEOGRAPHER: Going off the record at
20 11:15 a.m.

21 (A recess was taken.)

22 THE VIDEOGRAPHER: We're back on the record at
23 11:24 a.m.

24 BY MR. CRITTON:

25 Q. Back to the statement -- in fact, let's go

1 back to your statement. Well, let's stick with -- let's
2 start again. I'm going to stay with what you told the
3 Palm Beach police.

4 On the second occasion when you went, the
5 second and last occasion you told the Palm Beach police
6 you went to Mr. Epstein's home. I think you said you
7 think you drove, [REDACTED] may have gone, may not have, and
8 either [REDACTED] or [REDACTED] went, correct?

9 A. I don't remember. I guess correct.

10 Q. And when you went the second time, did you
11 tell the police the second and last time, did you tell
12 them what occurred on the second time?

13 A. I don't remember.

14 Q. What's your best recollection as to what you
15 did tell them?

16 A. I don't remember.

17 Q. Did you remember telling them on the second
18 time that you went -- let me strike that.

19 Do you remember telling them on the second
20 occasion that you took, that you went with [REDACTED] and
21 another girl named Jane Doe 4?

22 MR. HOROWITZ: Form.

23 BY MR. CRITTON:

24 Q. Do you remember saying that to the police?

25 A. I told you I don't remember exactly what I

1 said. I just remember telling them in general like what
2 happened.

3 Q. All right. So if the police report, their
4 probable cause affidavit says that the second occasion
5 you went, the only other occasion you went, that you
6 went with [REDACTED] and Jane Doe 4, you just don't remember
7 that as you sit here?

8 A. I -- now you jogged my memory. I didn't
9 remember what exactly I told them. It was seven years
10 ago.

11 Q. Actually it was in 2005. We're in 2010, so it
12 was something less than five years ago.

13 A. Sorry, five. It was a while ago. I just --

14 Q. Again, when you gave the statement to the
15 police in October, on October 4th of 2005, that was very
16 close to when you would have been at Mr. Epstein's home,
17 again depending on what year you choose, but as you say,
18 five years closer than today, correct?

19 A. Yes.

20 Q. All right. Now do you remember telling the
21 police on the second occasion that you went is that you
22 did not provide a massage to Mr. Epstein?

23 A. Yeah, I think I just said I went with [REDACTED] and not
24 somebody. I remember just going once with [REDACTED] and not
25 doing anything, just sitting in the kitchen while she

1 went up there and did the massage.

2 Q. All right. Do you also remember telling the
3 police at no time did Mr. Epstein remove the towel
4 around his body?

5 MR. HOROWITZ: Form.

6 THE WITNESS: I believe I said he just like
7 laid it over him, yes.

8 BY MR. CRITTON:

9 Q. Right. And you also told the police at no
10 time did he masturbate, true?

11 MR. HOROWITZ: Form.

12 THE WITNESS: I don't remember if I told the
13 police that or not.

14 BY MR. CRITTON:

15 Q. But if you told them that, was that true?

16 A. If I told them that he never masturbated?

17 Q. Yes, ma'am.

18 A. Absolutely not.

19 Q. So again, that would have been something else
20 now you are saying that you would have lied to the
21 police about?

22 MR. HOROWITZ: Wait, form. What you are doing
23 is totally disingenuous. The objection is to form.

24 BY MR. CRITTON:

25 Q. If I were to ask you to assume that you told

1 the police at no time did you see Mr. Epstein
2 masturbate, would that have been a lie?
3 A. Can you repeat that?
4 Q. Sure. Well, I'll have Rachel read it back,
5 please.
6 (A portion of the record was read by the
7 reporter.)
8 MR. HOROWITZ: Form.
9 THE WITNESS: Yes.
10 BY MR. CRITTON:
11 Q. From October 4th through 2005, including the
12 filing of your complaint, your amended complaint, your
13 interrogatories, supplemental answer to interrogatories,
14 having talked with the FBI as you described earlier, did
15 you ever go back and tell the Palm Beach police or offer
16 to go back and tell the Palm Beach police that you had
17 lied and you now wanted to tell them the truth?
18 A. No. I told the FBI that. I had told the FBI
19 that I lied to the Palm Beach police, and I figured that
20 they would tell the Palm Beach police exactly what
21 happened.
22 MR. CRITTON: Move to strike. Let me ask you
23 my question again.
24 BY MR. CRITTON:
25 Q. At any time did you ever go back from

1 October 4, 2005, up through the filing of your
2 complaint, your answers to interrogatories, your
3 supplemental answers to interrogatories, up through
4 today, have you ever gone back to the Palm Beach Police
5 Department and said "I'd like to correct my testimony,
6 because I lied to you"?
7 A. No. I told you I told the FBI --
8 Q. I don't want to know -- go ahead. Just a yes
9 or no is fine that question.
10 A. No.
11 MR. HOROWITZ: Form.
12 BY MR. CRITTON:
13 Q. Thank you.
14 All right, at some point -- well, let me go
15 back to the police. You talked to the police for an
16 hour, hour and a half. You never spoke with them again,
17 correct?
18 A. (Witness nods head up and down.)
19 Q. Okay. Did you call any of your friends and
20 tell them that, that you had spoken to the police? Did
21 you call Jane Doe 4?
22 A. Yes.
23 Q. Why? Why did you call Jane Doe 4?
24 A. Because she is one of my good friends.
25 Q. What did you tell her?

1 A. I told her what happened and asked her if she
2 talked to the police, and I can't remember if she talked
3 to them or not.
4 Q. Did you tell her that you had lied to the
5 police?
6 A. I told her I didn't tell the police
7 everything.
8 Q. Did you tell her -- my question was did you
9 tell her --
10 A. I don't remember.
11 Q. Let me ask the question so it's clear.
12 Did you tell Jane Doe 4 that you had lied to
13 the police?
14 A. I don't remember.
15 Q. You are aware that Jane Doe 4 is a plaintiff,
16 she's also bringing a suit for \$50 million or something
17 against Mr. Epstein, correct?
18 A. Yes.
19 Q. Okay. You are aware that she's represented by
20 your current attorneys?
21 A. Yes.
22 Q. Okay. How did you find out that Jane Doe 4
23 had brought a lawsuit against Mr. Epstein?
24 A. She told me.
25 Q. Okay. When did she tell you?

1 A. When we were up, living up in Orlando
2 together.
3 Q. And during what time period were you and Jane
4 Doe 4 living in Orlando together?
5 A. It was about a year ago, in the summer she
6 moved up there.
7 Q. Okay.
8 A. So --
9 Q. Sometime in 2008?
10 A. Yes.
11 Q. And what brought up the fact that she had
12 filed a lawsuit?
13 A. I don't remember.
14 Q. You had not brought a lawsuit until
15 September 10, 2008. So Jane Doe 4's lawsuit was filed
16 before yours, correct?
17 MR. HOROWITZ: If you know.
18 BY MR. CRITTON:
19 Q. I'll ask you to assume that date.
20 MR. HOROWITZ: If you know.
21 THE WITNESS: I guess, yes. I don't know.
22 BY MR. CRITTON:
23 Q. She said she had filed a lawsuit. Did she say
24 why?
25 A. I don't think so.

1 Q. Did she tell you why she had brought a
2 lawsuit?
3 A. No. I mean I knew what happened between her
4 and Jeffrey, some of it, so I just figured it was
5 because of what happened.
6 Q. Okay. Well, Jane Doe 4, you knew what Jane
7 Doe 4 was doing at Mr. Epstein's during the time she was
8 going to Mr. Epstein's, true?
9 MR. HOROWITZ: Form.
10 THE WITNESS: I didn't know everything that
11 was going on.
12 BY MR. CRITTON:
13 Q. She was telling you, though, some of the
14 things that were going on, correct?
15 A. A little bit, yes.
16 Q. When do you believe Jane Doe 4 started going
17 to Mr. Epstein's?
18 A. I don't really know. I'm assuming around the
19 same time I did.
20 Q. Do you know whether she went before or after
21 you for the first time?
22 A. I think she went after me. I'm not sure,
23 though.
24 Q. And what makes you think she, Jane Doe 4, went
25 after you?

1 A. I don't know. I don't remember exactly.
2 Q. Did you ever talk to Jane Doe 4, when [REDACTED]
3 asked you if you wanted to go to Mr. Epstein's, did you
4 ever, at that time were you aware that Jane Doe 4 had
5 gone?
6 A. I don't remember.
7 Q. Were you, other than [REDACTED] who you knew had
8 gone, were you aware of anyone else who had gone to
9 Mr. Epstein's at the time you first went?
10 A. No, I don't think so.
11 Q. All right. So let's get back to 2008, and
12 [REDACTED] -- I'm sorry, Jane Doe 4 was living with you in
13 Orlando during the summer of 2008?
14 A. (Witness nods head up and down.)
15 Q. Yes?
16 A. Yes.
17 Q. For how long a time period?
18 A. Just for the summer.
19 Q. Are we talking June through August?
20 A. I think March through May.
21 Q. Of '08?
22 A. Oh, no, no, sorry, it was May -- yeah,
23 probably May through August. I don't really remember.
24 It was during the summer, before her classes started
25 again.

1 Q. Before she went back to Lynn University?
2 A. Yes.
3 Q. And what, when she was up there, was it just
4 the two of you living in the apartment?
5 A. There were two other girls.
6 Q. Who were they?
7 A. I forget what girls we were living with at the
8 time. I don't remember what girls we were living with.
9 I think, because a lot of the girls left to go out of
10 town, so -- I don't know.
11 Q. All right. So sometime May through August of
12 '08 she, Jane Doe 4, was living there with you?
13 A. Yes.
14 Q. All right. And she told you during that time
15 that she had filed a lawsuit against Mr. Epstein?
16 A. Yes.
17 Q. Okay. Did she tell you who her lawyers were?
18 A. I don't think so.
19 Q. What did she tell you about the lawsuit?
20 A. She didn't tell me much. She just said she
21 was filing a lawsuit against him.
22 Q. Did she say why?
23 A. No. She -- no, I just assumed because it was
24 what happened.
25 Q. Okay. I'm sorry, did you say "Well, Jane Doe

1 4, you went over there voluntarily. Why would you file
2 a lawsuit?"
3 MR. HOROWITZ: Form.
4 THE WITNESS: No, I never said that.
5 BY MR. CRITTON:
6 Q. Did you say to her "You know, you got paid
7 money while you went. Why would you file a lawsuit when
8 you knew" -- strike that.
9 Did Jane Doe 4 ever tell you how many times
10 she went to Mr. Epstein's home?
11 A. No.
12 Q. Did she tell you what happened at
13 Mr. Epstein's home on any of the visits?
14 A. Briefly.
15 Q. What did she tell you?
16 A. Told me about how he asked her to go on a trip
17 with her -- or with him, but I saw the underwear that he
18 bought her and I remember him getting her a car. And
19 just briefly, I mean we didn't go into detail that much.
20 Q. So you and Jane Doe 4 have been great, best
21 friends since when?
22 A. Well, we've been good friends since my
23 freshman year of high school.
24 Q. Which would have been '02?
25 A. I believe so.

1 Q. All right. So from 2002 up through the
 2 current time, March of 2010, you and Jane Doe 4 have
 3 been best friends, correct?
 4 A. Yes.
 5 Q. All right. And you said I asked you if Jane
 6 Doe 4 told you why she filed a lawsuit, and you said
 7 well, she told me about some of the things that
 8 happened. You say that, one of the aspects you said is
 9 Mr. Epstein asked her to go on a trip with him, right?
 10 That's what she told you?
 11 A. Yes.
 12 MR. HOROWITZ: Form.
 13 BY MR. CRITTON:
 14 Q. Okay. Did she?
 15 A. No.
 16 Q. All right. And did she tell you why she
 17 didn't go on the trip with him?
 18 A. No.
 19 Q. All right. And she said that Mr. Epstein also
 20 bought her some underwear?
 21 A. Yes.
 22 Q. All right. Did she wear it?
 23 A. I don't know if she did or not.
 24 Q. So he bought her underwear and what's, what
 25 was, what in your mind was I'd say inappropriate or

1 shocking at least as Jane Doe 4 related to you as, that
 2 Mr. Epstein brought her underwear? What was the problem
 3 with that?
 4 A. I think he bought her like a sex toy or
 5 something too. I just thought it was weird that an old
 6 man or older guy, sorry, would do that.
 7 Q. Okay. Did you think, did she tell you that
 8 she wore the underwear?
 9 A. She never told me.
 10 Q. Did she tell you, did she describe a sex toy
 11 that she alleges that Mr. Epstein bought for her?
 12 A. No.
 13 Q. Did she tell you she used it?
 14 A. I didn't go into the sexual details with her.
 15 Q. Okay. Did she tell you she used it and she
 16 enjoyed it?
 17 A. She never told me that she used it and enjoyed
 18 it.
 19 Q. Would that have made a difference to you?
 20 MR. HOROWITZ: Form.
 21 THE WITNESS: No.
 22 BY MR. CRITTON:
 23 Q. Did the fact, separate and apart from your
 24 opinion, the fact that Jane Doe 4 said he had bought,
 25 he, Mr. Epstein had bought underwear for her, did she

1 seem to be disturbed in any way about that?
 2 A. Yeah, she thought it was kind of weird.
 3 Q. Did you say "Well, gee, when he bought the
 4 underwear for you, did you ever go back to Mr. Epstein's
 5 if you thought that was so weird?"
 6 Did you ask that question?
 7 A. No, I did not.
 8 Q. Okay. Is it your testimony that based upon
 9 the fact that she, Jane Doe 4, related to you that it
 10 was weird that Mr. Epstein had bought her underwear, you
 11 would have assumed then, based on her comment to you,
 12 that she never would have returned to Mr. Epstein's
 13 after that point because she thought it was weird,
 14 correct?
 15 MR. HOROWITZ: Form.
 16 THE WITNESS: I don't remember what exactly
 17 she thought.
 18 BY MR. CRITTON:
 19 Q. What was her reaction to, at least what she
 20 purportedly told you, that Mr. Epstein had bought her a
 21 sex toy?
 22 MR. HOROWITZ: Form.
 23 THE WITNESS: I think she just thought it was
 24 inappropriate.
 25

1 BY MR. CRITTON:
 2 Q. And did she describe what the sex toy was?
 3 A. I don't remember.
 4 Q. Did she tell you whether it was a vibrator
 5 or --
 6 A. I don't think it was a vibrator, but I don't
 7 remember.
 8 Q. And you knew what a vibrator was in 2008,
 9 correct?
 10 A. Yes.
 11 Q. Did you know what a vibrator was in 2007?
 12 A. Yes.
 13 Q. In 2006?
 14 A. Yes.
 15 Q. And since when? How long have you known what
 16 a vibrator is?
 17 MR. HOROWITZ: Form.
 18 THE WITNESS: I have no idea.
 19 BY MR. CRITTON:
 20 Q. Were you aware of what a vibrator was when you
 21 were a freshman in high school?
 22 A. I don't remember.
 23 Q. How about a sophomore?
 24 A. I don't really remember when I knew, found out
 25 what that was.

1 Q. Well, certainly she, meaning Jane Doe 4, is
2 telling you that he brought her a vibrator, and she
3 thought it was inappropriate, right?

4 A. Yes.

5 Q. All right. And did you say "Gee, did you ever
6 go back to Mr. Epstein's home after he brought you the
7 vibrator?"

8 A. I never asked her that, if she did or not. I
9 don't remember when she bought it or he got it for her.

10 Q. Well, assuming that he bought the vibrator for
11 her sometime during the time she was going to
12 Mr. Epstein's house, based at least upon what she said
13 to you she thought it was inappropriate, you would have
14 expected her never to return to Mr. Epstein's home,
15 correct?

16 MR. HOROWITZ: Form.

17 THE WITNESS: No, I mean that was her opinions
18 and her own, I mean status with him. So I didn't
19 really know what she was thinking or what she
20 thought besides --

21 BY MR. CRITTON:

22 Q. She thought it was inappropriate, but it
23 wouldn't have prevented her, at least what she told you,
24 from going to Mr. Epstein's home, correct?

25 MR. HOROWITZ: Form.

1 THE WITNESS: I don't remember if she went
2 after that.

3 BY MR. CRITTON:

4 Q. You don't know one way or the other, she just
5 told you she thought that him getting a sex toy for her,
6 a vibrator for her was inappropriate?

7 A. Yes, she said it was weird, so --

8 Q. You used the word inappropriate. That's why I
9 used it.

10 MR. HOROWITZ: Form.

11 THE WITNESS: Inappropriate, weird.

12 BY MR. CRITTON:

13 Q. Same thing to you?

14 A. Same thing.

15 Q. So if something happened that was weird or
16 inappropriate from your perspective, you never would
17 have gone back to Mr. Epstein's home, would you?

18 MR. HOROWITZ: Form.

19 THE WITNESS: This is like after I stopped
20 going.

21 BY MR. CRITTON:

22 Q. I understand that, but if something weird or
23 inappropriate had happened at Mr. Epstein's home during
24 the time you were going, you never would have returned,
25 would you?

1 MR. HOROWITZ: Form.

2 THE WITNESS: Weird and inappropriate might be
3 different from my perspective to her perspective.

4 BY MR. CRITTON:

5 Q. So you think him having purchased -- did he
6 ever purchase underwear for you?

7 A. No.

8 Q. I assume he never bought a vibrator or a sex
9 toy for you?

10 A. No.

11 Q. So you would have considered those both
12 inappropriate and weird if he had done that, the eight
13 to ten times you claim that you went, you would have
14 said I'm never going back because that's weird and
15 inappropriate, right?

16 MR. HOROWITZ: Form.

17 THE WITNESS: I mean I don't know what I would
18 have thought. If it was in the moment, I don't
19 know. I can't really remember what I was thinking
20 at that point.

21 BY MR. CRITTON:

22 Q. I assume, though, if you understood if Jane
23 Doe 4 was saying Mr. Epstein getting her underwear and
24 getting her a vibrator was weird and inappropriate was
25 if you had found something that was weird or

1 inappropriate that had happened at Mr. Epstein's house,
2 whether it was the first time, the second or third or
3 fourth, you wouldn't have returned, would you, because
4 you would have said why should I go back to somebody's
5 house where something weird or inappropriate is
6 happening, correct?

7 MR. HOROWITZ: Form.

8 THE WITNESS: I thought everything was weird
9 and inappropriate that he was doing, so --

10 BY MR. CRITTON:

11 Q. And you knew that --

12 MR. HOROWITZ: Wait, you're cutting --

13 MR. CRITTON: Go ahead. Now you want her to
14 finish. Go ahead.

15 MR. HOROWITZ: I always want her to finish.

16 MR. CRITTON: Yeah, right.

17 MR. HOROWITZ: Move to strike.

18 MR. CRITTON: Do you want the answer read back
19 so you can fill in the blank?

20 THE WITNESS: No.

21 BY MR. CRITTON:

22 Q. Okay. Were done with your answer?

23 A. Yes.

24 MR. CRITTON: Would you read me the question
25 and answer back. In fact, just let me look over

1 your shoulder, Rachel. Okay.
 2 BY MR. CRITTON:
 3 Q. Okay. So if I understood your testimony, you
 4 said that every time or -- let me strike again, start
 5 again.
 6 If I understand your testimony, it's your
 7 testimony that everything that occurred at Mr. Epstein's
 8 house when you were there was weird and inappropriate?
 9 MR. HOROWITZ: Form.
 10 THE WITNESS: I mean yes, to some degree I
 11 thought was.
 12 BY MR. CRITTON:
 13 Q. And you knew that at the time it was weird and
 14 inappropriate, the eight to ten times that you were
 15 there, correct?
 16 A. I mean at first I didn't -- I mean now I know
 17 that it's weird and inappropriate. I mean but then I
 18 think I was so confused and I didn't really know what I
 19 was doing, and I mean I don't know, I was young and I
 20 wasn't thinking.
 21 Q. Well, however old you were, depending on which
 22 dates we use here, is it's your testimony that what you
 23 believe occurred at Mr. Epstein's home, even when you
 24 were at whatever age you were, whether it was 16 or 17
 25 or whatever age, you thought it was weird and

1 inappropriate, true?
 2 MR. HOROWITZ: Form.
 3 THE WITNESS: I mean yeah, I thought it was
 4 uncomfortable, yes.
 5 BY MR. CRITTON:
 6 Q. All right. And uncomfortable now, that's a
 7 new word, so can I -- is weird equal to inappropriate
 8 versus uncomfortable to you?
 9 MR. HOROWITZ: Form.
 10 BY MR. CRITTON:
 11 Q. Can I use those as synonyms, basically the
 12 same meaning?
 13 A. Yes.
 14 Q. All right. Now back to Jane Doe 4 again.
 15 She's telling you, she's now living with you in Orlando
 16 during the summer of '08. She told you that Mr. Epstein
 17 asked her on a trip. She thought that was
 18 inappropriate. She didn't go. He got her underwear and
 19 a sex toy, vibrator. She thought that was
 20 inappropriate. You said he got her a car.
 21 For what?
 22 MR. HOROWITZ: Form.
 23 BY MR. CRITTON:
 24 Q. What did she tell you?
 25 A. I don't exactly remember why he bought it for

1 her. I don't know, her car might have been not working.
 2 I don't really remember.
 3 Q. You mean he like rented a car to help her out?
 4 A. Yes, I think so.
 5 Q. Did she think that was weird or inappropriate?
 6 MR. HOROWITZ: Form.
 7 THE WITNESS: I don't remember.
 8 BY MR. CRITTON:
 9 Q. All right. Well, my original question was
 10 what did she tell you as to why she was filing a lawsuit
 11 against Mr. Epstein? And I think your answer was he
 12 asked her on a trip, underwear and a sex toy and a car.
 13
 14 MR. HOROWITZ: Form.
 15 BY MR. CRITTON:
 16 Q. So my question again is what else, if
 17 anything, did she tell you as to what the basis of her
 18 suit was against Mr. Epstein?
 19 A. I mean I assumed he did to her what he did to
 20 me, so I'm assuming that's why she would sue him.
 21 Q. Okay. My question is what did she tell you,
 22 not what you assumed. What did she tell you?
 23 A. I don't exactly remember what she told me.
 24 Q. Did she tell you anything other than the trip,
 25 the underwear, the vibrator, and the car?

1 MR. HOROWITZ: Form.
 2 THE WITNESS: I don't remember.
 3 BY MR. CRITTON:
 4 Q. All right. So Jane Doe 4, who is your best
 5 friend, who was going to Mr. Epstein's during, about the
 6 same time you were, whatever, if that was in 04, '05,
 7 whatever the dates were, now she is telling you about a
 8 lawsuit she's filed, and you can't remember anything
 9 that she's ever told you about what she did at
 10 Mr. Epstein's house; is that correct?
 11 MR. HOROWITZ: Form.
 12 THE WITNESS: I mean I remember just the main
 13 points, like I remember the car was like a big
 14 deal, the sex toy, the underwear. That was a big
 15 deal. I remember like the main things that
 16 happened. I don't remember every little detail she
 17 told me about what happened at Jeffrey's.
 18 BY MR. CRITTON:
 19 Q. Did she tell you any of the details of what
 20 happened at Mr. Epstein's?
 21 A. Like I said, I don't remember. I knew that he
 22 tried a lot with her, because she went there a lot, but
 23 I don't exactly remember what exactly he tried with her
 24 and did on her. So no.
 25 Q. Did she ever tell you?

1 A. I don't remember. She probably did and I just
 2 forget exactly what she told me.
 3 Q. At any time during the time she was going to
 4 Mr. Epstein's home and you knew she was going there, did
 5 she ever tell you that anything inappropriate had ever
 6 occurred?
 7 MR. HOROWITZ: Form.
 8 THE WITNESS: I mean I thought the underwear
 9 was inappropriate. I thought asking to go on a
 10 trip is inappropriate. So I mean yes.
 11 BY MR. CRITTON:
 12 Q. Okay. And as of, during the time again she
 13 was at Mr. Epstein's house and up until the time that
 14 the police interviewed you in October, on October 4th of
 15 2005, did Jane Doe 4 ever tell you that anything that
 16 had occurred at Mr. Epstein's house had caused her any
 17 embarrassment or humiliation?
 18 MR. HOROWITZ: Form.
 19 THE WITNESS: I don't remember.
 20 BY MR. CRITTON:
 21 Q. Did she ever tell you that she was in any way
 22 assaulted or in any way physically abused at
 23 Mr. Epstein's home?
 24 A. I just remember her being like in shock about
 25 everything and just like I know he tried a lot on her

1 just because she went there a lot and he really liked
 2 her and L.A.
 3 So I mean I think that's, you know -- I
 4 don't --
 5 Q. Did she, Jane Doe 4, during the time she was
 6 going to Mr. Epstein's house, did she tell you she was
 7 in shock?
 8 MR. HOROWITZ: Form.
 9 THE WITNESS: That was my opinion, that she
 10 was kind of in shock over everything, because, I
 11 don't know.
 12 BY MR. CRITTON:
 13 Q. I want to focus on a time period. Prior to
 14 the October 4th visit from the Palm Beach police, okay?
 15 Before, in essence, someone other than your friends knew
 16 that, at least from your perspective, that you had been
 17 to Mr. Epstein's home -- in fact, I should probably ask
 18 it this way.
 19 Who knew that you had gone to Mr. Epstein's
 20 home before the police came there? Certainly [redacted] did.
 21 A. Yes, [redacted] and Jane Doe 4 and [redacted] and [redacted]
 22 Q. Because you had taken [redacted] and [redacted] to
 23 Mr. Epstein's home?
 24 A. I had just taken [redacted] one of the sisters,
 25 like I told you.

1 Q. [redacted] or [redacted] one or the other?
 2 A. I think it was [redacted] I'm pretty sure, and they
 3 both knew about it.
 4 Q. So both [redacted] and [redacted] knew, because you had
 5 taken more likely than not [redacted] to Mr. Epstein's home,
 6 yes?
 7 A. I mean a lot of girls in our school knew about
 8 it.
 9 Q. Knew that you were going there?
 10 A. Just knew about the whole Jeffrey thing that
 11 was going on.
 12 Q. Pretty common knowledge?
 13 A. I mean I'm not --
 14 Q. In your school?
 15 A. Not common, but I mean like my friends just
 16 knew about it because he targeted like [redacted] targeted a
 17 lot of my friends.
 18 Q. Well, she may have asked you, she didn't
 19 necessarily target -- you were her friend?
 20 MR. HOROWITZ: Form.
 21 BY MR. CRITTON:
 22 Q. You don't know whether she targeted you or
 23 not. She asked you if you wanted to go to Mr. Epstein's
 24 didn't know?
 25 MR. HOROWITZ: Form.

1 THE WITNESS: Yes.
 2 BY MR. CRITTON:
 3 Q. You could have said yes and you could have
 4 said no?
 5 A. I mean yes, that's true.
 6 Q. All right. And your decision to go to
 7 Mr. Epstein's was a voluntary one; that is, again,
 8 because you could have said sure, I'll go; or no, no
 9 interest, right?
 10 A. Yes.
 11 Q. Okay. And my guess is you are aware of girls,
 12 females at your school who [redacted] asked to go and they
 13 said no, I'm not going, or I don't have any interest,
 14 right?
 15 A. No.
 16 Q. So everyone that [redacted] ever asked --
 17 A. I don't know exactly who [redacted] asked.
 18 Q. Are you aware of anyone who [redacted] asked that
 19 didn't want to go?
 20 A. No.
 21 Q. All right. And in fact, you and others would
 22 ask [redacted] if you could go to Mr. Epstein's; isn't that
 23 true?
 24 A. No.
 25 Q. Okay. Is it your testimony that you never

1 asked [redacted] if you could go to Mr. Epstein's?
 2 A. [redacted] asked me twice, and then [redacted] asked me
 3 from then on. So I never asked [redacted] to go.
 4 Q. Okay. Did you ever make a call to [redacted]?
 5 A. No, [redacted] would always call --
 6 MR. HOROWITZ: Let him finish. You know what
 7 each other is going to say, but let him finish.
 8 BY MR. CRITTON:
 9 Q. Did you ever make a call to [redacted]?
 10 A. No, not that I could remember.
 11 Q. And if [redacted] called you, she basically said,
 12 in essence the conversation was "Would you like to come
 13 over today?"
 14 A. Yeah, she asked me what my schedule was and
 15 when I had school and classes and like what days I could
 16 come.
 17 Q. And that was the extent of the conversation,
 18 it was strictly a scheduling?
 19 A. No, and she asked me if I knew anybody too
 20 that I would want to bring for a massage.
 21 Q. Okay. And that was the extent of the
 22 conversation, at least as to you? Whatever
 23 conversations you had with Sarah, she may have called
 24 you on the phone and she said basically is what's your
 25 schedule? Can you come at a certain time, or what times

1 can you come?
 2 That was one aspect of the conversation,
 3 correct?
 4 A. Yes.
 5 Q. Okay. And if you didn't want to go, you would
 6 have said I'm not interested, correct?
 7 A. Yes.
 8 Q. All right. So you had to again make a
 9 voluntary decision, number one, to pick up the phone if
 10 Sarah was calling you so you could talk to her and say
 11 either yes or no, correct?
 12 A. Yes.
 13 Q. And then you had to make a voluntarily
 14 consensual decision once you talked with [redacted] to give
 15 her your schedule or not, correct?
 16 A. Yes.
 17 Q. And then you had to ultimately schedule a time
 18 to go over to Mr. Epstein's, and then you would have to
 19 get in your car or however you -- mostly your car so you
 20 could transport yourself over there, true?
 21 A. Yes.
 22 Q. So in all of those, you had to make a decision
 23 to say yes, yes, yes, yes, right?
 24 A. Yes.
 25 Q. And in each those instances, you wouldn't have

1 been confused because you had time to think about it and
 2 say no or simply not go, correct?
 3 MR. HOROWITZ: Form.
 4 THE WITNESS: I mean I guess you would say
 5 that.
 6 BY MR. CRITTON:
 7 Q. All right. And in terms of -- all right, I'll
 8 come back to that in a bit. Let me get back to, I think
 9 I was on Jane Doe 4 before I got off on a little tangent
 10 here, so let me go back to Jane Doe 4.
 11 When she told you through the summer -- well,
 12 let me strike that.
 13 During the time that she was going to
 14 Mr. Epstein's, you said she never said she was
 15 embarrassed or humiliated or had been traumatized,
 16 correct?
 17 MR. HOROWITZ: Form.
 18 BY MR. CRITTON:
 19 Q. That is, she never told you that?
 20 A. I mean I could tell that obviously she, she
 21 was just kind of under a spell of him like buying her
 22 things and giving her things and going there so much.
 23 And I could tell she was just kind of -- you know, he
 24 was just kind of brainwashing her, her and L.A. That's
 25 why I stopped going, because it just had got too much

1 the last visit. So --
 2 Q. This is, L.A. is L.A.?
 3 A. Yes.
 4 Q. Okay. And did L.A. go to Mr. Epstein's home
 5 too?
 6 A. Yes.
 7 Q. Were you ever present when L.A. was there?
 8 A. No.
 9 Q. How old was L.A. when she went?
 10 MR. HOROWITZ: Form.
 11 THE WITNESS: I don't remember. I think 18.
 12 BY MR. CRITTON:
 13 Q. And therefore, at 18 she could decide to
 14 either go or not go, just like Jane Doe 4 or you or
 15 anyone else, true?
 16 A. Yes.
 17 Q. All right. Were you ever -- I may have just
 18 asked you this. I was thinking about something else.
 19 Were you ever present when L.A. was there?
 20 A. No.
 21 Q. Are you aware that L.A. ever went with Jane
 22 Doe 4?
 23 A. I think they went together before.
 24 Q. Okay. Did they tell you that?
 25 A. I think Jane Doe 4 told me she went with L.A.

1 I don't remember.
 2 Q. Did either L.A. or Jane Doe 4 ever describe to
 3 you up until the time you were interviewed by the Palm
 4 Beach Police Department that they were, had been in any
 5 way embarrassed, humiliated or traumatized by any of
 6 their visits to Mr. Epstein's home?
 7 MR. HOROWITZ: Form.
 8 THE WITNESS: Well, at that point nobody knew
 9 about it yet, so I'm sure they wouldn't have been
 10 embarrassed, because I mean their parents didn't
 11 know like they do now, or Jane Doe 4's sister or
 12 anybody else, you guys depositioned for her. So I
 13 mean at that point they probably wouldn't have been
 14 embarrassed.
 15 BY MR. CRITTON:
 16 Q. Or humiliated, right, because they chose to go
 17 there?
 18 MR. HOROWITZ: Form.
 19 THE WITNESS: At the point they were young and
 20 they weren't really thinking, as I. So --
 21 BY MR. CRITTON:
 22 Q. All I'm asking is what they have told you
 23 okay? Or what you observed.
 24 So would it be a correct statement as of the
 25 time you were interviewed by the Palm Beach police, you

1 awful experience, that's something that you would
 2 generally remember, isn't it?
 3 MR. HOROWITZ: Form.
 4 BY MR. CRITTON:
 5 Q. Especially a good friend like Jane Doe 4?
 6 A. Yeah, I knew he tried a lot of stuff on her
 7 and she was definitely uneasy with it and, you know, I
 8 just think she just kept going for the money basically.
 9 Q. Did she tell you she was uneasy with it?
 10 MR. HOROWITZ: Form.
 11 THE WITNESS: I forget exactly what she told
 12 me, but the summary of it was that she --
 13 BY MR. CRITTON:
 14 Q. Summer of '08 now she is telling you this?
 15 MR. HOROWITZ: She said the sum of it, I
 16 think.
 17 BY MR. CRITTON:
 18 Q. Are you saying the sum of it.
 19 A. The sum of it was that she was uneasy and
 20 didn't want to go there, but she was basically just
 21 going for the money.
 22 Q. Well, did she tell you that she was going back
 23 to Mr. Epstein's because she wanted to make money?
 24 A. No, that's what I assumed.
 25 Q. Again, I want to know what she told you versus

1 didn't notice that Jane Doe 4 was either embarrassed or
 2 humiliated for having gone to Mr. Epstein's, true?
 3 A. I don't think she was embarrassed or
 4 humiliated, because nobody knew about it, so --
 5 Q. And from at least what she either told you or
 6 what you observed, she didn't say she was traumatized in
 7 any way because she kept going, right?
 8 MR. HOROWITZ: Form.
 9 THE WITNESS: Yeah, I mean she was obviously
 10 didn't want to go, but she kept going I think just
 11 for the money and just because he was good at
 12 smooth talking and I mean just made her feel
 13 comfortable.
 14 BY MR. CRITTON:
 15 Q. Move to strike. Let me ask you my question
 16 again.
 17 Did Jane Doe 4 ever tell you she was
 18 traumatized as of the date you gave your interview to
 19 the Palm Beach police, October 4th of 2005, that she had
 20 been traumatized in any way by Mr. Epstein?
 21 MR. HOROWITZ: Form.
 22 THE WITNESS: I don't remember.
 23 BY MR. CRITTON:
 24 Q. All right. Well, if one of your friends told
 25 you that they had had a traumatic experience or some

1 what you assumed.
 2 So would it be a correct statement, she didn't
 3 tell you she was in any way traumatized or emotionally
 4 or psychologically damaged by anything that was
 5 occurring with Mr. Epstein?
 6 She never said that to you, did she?
 7 MR. HOROWITZ: Form.
 8 BY MR. CRITTON:
 9 Q. Let me rephrase the question. Did Jane Doe 4,
 10 as of October 4 of 2005 when the Palm Beach police came
 11 to interview you, up to that point, had Jane Doe 4 ever
 12 said to you that she was in any way traumatized either
 13 emotionally or mentally by any of her visits to
 14 Mr. Epstein's home?
 15 MR. HOROWITZ: Form.
 16 BY MR. CRITTON:
 17 Q. What she told you.
 18 A. I don't remember exactly if she ever told me
 19 she was traumatized or what -- it was so long ago, I
 20 can't remember everything she said to me. I just
 21 remember the main parts that stick out.
 22 Q. The car, the trip, the sex toy and the
 23 underwear. That's what you remember?
 24 A. Yes.
 25 Q. And that's what she told you in May or the

1 summer of '08 when she was living with you?
 2 MR. HOROWITZ: Form.
 3 BY MR. CRITTON:
 4 Q. Right?
 5 A. Yes.
 6 Q. And you don't remember anything else --
 7 A. Well, I mean I knew about the car I mean
 8 before she was living with me.
 9 Q. I understand, but at least that's the first
 10 time -- strike that.
 11 At least as of October 4th of '05 when you
 12 were interviewed by the Palm Beach police, you don't
 13 remember anything else that stands out in your mind
 14 where Jane Doe 4 told you anything bad had occurred at
 15 Mr. Epstein's?
 16 MR. HOROWITZ: Form.
 17 BY MR. CRITTON:
 18 Q. As you sit here today that you can relate,
 19 correct?
 20 MR. HOROWITZ: Form.
 21 THE WITNESS: I mean she did tell me stuff. I
 22 knew she was going a lot and I know he was really
 23 trying stuff on her, and I just can't remember the
 24 details. I knew about all that before the police
 25 even came, and I knew about the car before the

1 A. Yes.
 2 Q. And as of the time you were interviewed, you
 3 were no longer seeing Mr. Epstein?
 4 A. Yes.
 5 Q. Had you made a decision not to see him anymore
 6 at some point?
 7 A. Yes.
 8 Q. And even though you were at whatever age, you
 9 made a conscious decision I don't want to go to
 10 Mr. Epstein's home anymore?
 11 A. Yes.
 12 Q. Right? And you could have made that decision
 13 on the first visit, the second, the third, the fourth,
 14 the fifth, any time up until the time you stopped,
 15 right?
 16 A. Yes.
 17 Q. And with regard to Jane Doe 4, was she aware
 18 that you had been to Mr. Epstein's on a number of
 19 occasions?
 20 MR. HOROWITZ: Form.
 21 BY MR. CRITTON:
 22 Q. Did you tell her?
 23 A. Yes.
 24 Q. Did you ever tell her why you stopped going to
 25 Mr. Epstein's?

1 police came. I don't know if I knew -- I don't
 2 know if the underwear was before or after the
 3 police.
 4 BY MR. CRITTON:
 5 Q. Did you ever say to her if he was, quote,
 6 unquote, trying stuff is why are you going back?
 7 A. No. I mean that's her own deal and her own
 8 decision.
 9 Q. All right. And in fact she was 18 at the
 10 time?
 11 MR. HOROWITZ: Form.
 12 BY MR. CRITTON:
 13 Q. She was a freshman as of October of 2005,
 14 she's is a freshman at [REDACTED], right?
 15 A. Yes.
 16 Q. Okay. And you and Jane Doe 4 are the same
 17 age?
 18 A. We're around the same age, yeah. Well, yeah.
 19 Q. I mean, I'm sorry, you may not be the exact
 20 same age, but you were also now at [REDACTED] up in
 21 Orlando?
 22 A. Yes.
 23 Q. In '05, correct?
 24 A. Yes.
 25 Q. So you were away at college too?

1 A. I believe so.
 2 Q. What did you tell her?
 3 A. I don't really remember. I just remember
 4 telling her the last time was, made me feel really
 5 uncomfortable and he definitely had forcefully tried to
 6 do stuff with me, and that's why I stopped going.
 7 Q. Okay. And at least from your perspective, if
 8 he hadn't as you allege forcefully tried to do
 9 something, you would have continued to go see
 10 Mr. Epstein?
 11 MR. HOROWITZ: Form.
 12 THE WITNESS: No, because every time I went
 13 there, he would try more and more and more, and to
 14 the point where I was done. And so I wouldn't have
 15 continued to keep going.
 16 BY MR. CRITTON:
 17 Q. Okay. And you told that, it's your testimony
 18 you told Jane Doe 4 that?
 19 MR. HOROWITZ: Form.
 20 THE WITNESS: I don't remember. I think I
 21 told her. I just, I don't remember for sure
 22 exactly. I think I did tell her.
 23 BY MR. CRITTON:
 24 Q. All right.
 25 A. Because I think she asked me why I didn't go

1 there anymore. I don't remember exactly what I told
2 her, though.

3 Q. Did she, Jane Doe 4, tell you that she enjoyed
4 going to Mr. Epstein's?

5 A. No.

6 Q. Would you be surprised if in her deposition
7 she testified to that fact?

8 MR. HOROWITZ: Form.

9 THE WITNESS: I mean like I'm sure he
10 brainwashed everybody. At the point where he was
11 asking her to get on private jets and go on
12 vacations, maybe, I don't know.

13 BY MR. CRITTON:

14 Q. My question is did she tell you? There is a
15 distinction between what you are assuming and what she
16 told you.

17 In fact, Rachel, would you go back --

18 MR. HOROWITZ: Your question was --

19 MR. CRITTON: I'm going to have it read back.

20 (A portion of the record was read by the
21 reporter.)

22 BY MR. CRITTON:

23 Q. When you talked with Jane Doe 4 in May or
24 during the summer of '08 when she told you she had
25 brought her lawsuit, did she tell you what she was

1 looking for? That is, what did she want from
2 Mr. Epstein?

3 A. She just wanted justice. She was upset like
4 every other girl and she just wanted, you know, more
5 than anything to see him in jail, and I mean yeah.

6 Q. And ultimately he was in jail at that time,
7 was he not?

8 A. That was like a slap on the wrist basically.

9 Q. How do you know? It's the justice system.

10 Let me start again.

11 A. Because I read all the newspapers and I think
12 I know --

13 Q. Okay.

14 A. I mean if you have money, I mean he could
15 hire, afford to hire you and other great lawyers that
16 make girls feel like crap and don't mind doing it, so --

17 Q. Well, I had nothing to do with your going to
18 Mr. Epstein's the first occasion, did I?

19 A. I mean --

20 Q. Yes or no?

21 A. You don't think it was wrong what he did?

22 Q. Yes or no, did I have anything to do with you
23 ever going to Mr. Epstein's?

24 A. Of course not. I didn't know you back then.

25 Q. Thank you. And in fact, none of Mr. Epstein's

1 lawyers had anything to do with you going to
2 Mr. Epstein's the first time, did they?

3 A. Of course not, no.

4 Q. Okay. In fact, it was, more importantly, the
5 second time you went to Mr. Epstein's, that was
6 completely a voluntary consensual decision that you made
7 in your own mind to go back to his home, not
8 Mr. Epstein, but your decision, correct?

9 MR. HOROWITZ: Form.

10 THE WITNESS: Yeah, when I was around 16 at
11 the time. I mean yeah.

12 BY MR. CRITTON:

13 Q. Just a yes or a no, okay? I know you want to
14 justify what you did or not did, so let me ask a clean
15 question.

16 At the time you went to Mr. Epstein's the
17 second time -- you went to Mr. Epstein's the first time
18 with [REDACTED] correct?

19 A. Uh huh.

20 Q. All right. Yes?

21 A. Yes.

22 Q. Okay. The second time you went to
23 Mr. Epstein's, that was completely your decision, right?

24 MR. HOROWITZ: Form.

25 THE WITNESS: I already told you that, yes.

1 BY MR. CRITTON:

2 Q. And Mr. Epstein had nothing to do with that,
3 it was your decision to either go or not go?

4 A. He's the one that got the girls to go there.
5 He had everything to do with it.

6 Q. But it was your decision to go or not, not
7 Mr. Epstein's? I mean he could ask you to come back.

8 A. He never would have asked [REDACTED] to hunt down
9 girls to bring them there. I never would have went
10 there, I never would have been put in that position. I
11 don't think anybody when they are 16 years old should
12 have been put in that position by a 55 or however old he
13 is man.

14 Q. Let me ask you this. I think you said you
15 took [REDACTED] to Mr. Epstein's home.

16 A. Yes.

17 Q. How many times had you been to Mr. Epstein's
18 home before you took [REDACTED]?

19 A. I think I took her like the second visit, like
20 around the second visit.

21 Q. Okay.

22 A. He didn't really try that much with me the
23 first visit. If I would have known everything he was
24 doing with girls like I have known now, I never would
25 have asked any other girlfriends to go.

1 Q. Move to strike.
 2 I think you said you took [REDACTED] after your
 3 second visit, or was it --
 4 A. I think around the second or the third. I
 5 don't know exactly.
 6 Q. When did you take [REDACTED] if she's the one you
 7 took? When did you take her?
 8 A. I think around -- I don't know. I don't
 9 remember what visit, but I remember it was towards the
 10 beginning.
 11 Q. Did you not, those are the only two you ever
 12 took?
 13 A. Yes.
 14 Q. Why would you take -- I mean you had to make
 15 the decision, you in essence did the same thing --
 16 A. [REDACTED] --
 17 Q. I have to ask the question.
 18 A. Sorry.
 19 Q. When you took [REDACTED] you were doing the same
 20 thing that [REDACTED] was doing, were you not?
 21 MR. HOROWITZ: Form.
 22 THE WITNESS: [REDACTED] asked me to go.
 23 BY MR. CRITTON:
 24 Q. Whether she asked you or not, when [REDACTED] asked
 25 you to go, asked you to take her, in essence, you were

1 doing the same thing that [REDACTED] was doing, right?
 2 MR. HOROWITZ: Form.
 3 THE WITNESS: No.
 4 BY MR. CRITTON:
 5 Q. You see it in a different view because [REDACTED]
 6 asked you if you could go to Mr. Epstein's?
 7 A. [REDACTED] asked me to go to take her there. She
 8 wanted to go.
 9 Q. Okay. So I assume when you took [REDACTED] to
 10 Mr. Epstein's, you didn't take any money from
 11 Mr. Epstein from having brought her there; is that true?
 12 A. I did take money.
 13 Q. You did take money. How much money did you
 14 take for [REDACTED] asking you if you could go to Mr.
 15 Epstein's?
 16 A. \$200.
 17 Q. Did you say, "Gee, [REDACTED] I'm not going to take
 18 any money for bringing you to Mr. Epstein's, that's
 19 wrong. That's not something I should do. I don't want
 20 to do the same thing, in essence, that [REDACTED] is doing"?
 21 A. I didn't realize at the point that it was
 22 something bad and wrong until now obviously I do, but
 23 back then when I was 16, I didn't really realize, you
 24 know, that it was wrong. And I, I was confused and
 25 just, I mean all the girls in my high school were, that

1 I heard about, my friends were doing it and going there
 2 and --
 3 Q. Do you think what [REDACTED] did was wrong?
 4 A. Honestly, I think [REDACTED] was just brainwashed by
 5 him, and I feel bad for her, because I mean that was
 6 wrong what he did, brainwashing her to bring other
 7 girls.
 8 Q. When you took --
 9 MR. CRITTON: How much time?
 10 THE VIDEOGRAPHER: Two minutes.
 11 BY MR. CRITTON:
 12 Q. All right. You took [REDACTED] correct?
 13 A. Yes.
 14 Q. And [REDACTED] did you ask her if she wanted to go?
 15 A. No. She heard about it too and she asked me
 16 about it. And I told her I went, and then she asked me,
 17 she was like "Oh, well, can you bring me there?"
 18 Q. Did you say "No, I don't think it's -- I think
 19 it's uncomfortable, weird and inappropriate, I don't
 20 think I'll take you there"?
 21 A. At the time, like it was towards the very
 22 beginning when I was going there. And he wasn't really
 23 doing this much or trying as much with the girls as
 24 towards the end that I heard about.
 25 Q. Okay. So you think you took [REDACTED] about the

1 third or fourth time you were there?
 2 A. I think it was around the second or third as I
 3 took [REDACTED] and [REDACTED]
 4 Q. Did you take them the same day?
 5 A. No, I took one like around the second time and
 6 one around the third time. I don't really remember.
 7 MR. CRITTON: Okay, let's have a break.
 8 THE VIDEOGRAPHER: Going off the record at
 9 12:09 a.m. This marks the end of tape one.
 10 (A recess was taken.)
 11 (End of Volume I)
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25