

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

JANE DOE NO. 2,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

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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,

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DEPOSITION OF JANE DOE #7 - VOLUME II  
(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:  
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 12 On behalf of the Defendant Jeffrey Epstein:  
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 19  
 20 Also Present: Sasha Quimby, videographer  
 21  
 22  
 23  
 24  
 25

1 PROCEEDINGS  
 2 ---  
 3 THE VIDEOGRAPHER: We're back on the record at  
 4 12:19 p.m. This is marks the beginning of tape 2.  
 5 BY MR. CRITTON:  
 6 Q. When you took F.E. to Mr. Epstein's, I think  
 7 you said she asked you to take her.  
 8 A. Yes. She knew about it and she asked me, she  
 9 said she wanted to go.  
 10 Q. Okay. Did you say, and did you tell her "No,  
 11 I don't think you should go"?  
 12 A. No. I never said that.  
 13 Q. Did you take her so you could make money?  
 14 First of all, let me ask you this. Did you  
 15 make money from taking F.E. to Mr. Epstein's home?  
 16 A. Yes.  
 17 Q. How much?  
 18 A. 200.  
 19 Q. Okay. And when F.E. came down, did she give  
 20 Mr. Epstein a massage?  
 21 A. Yes.  
 22 Q. Did she ever say anything inappropriate  
 23 happened during the course of the massage?  
 24 A. No.  
 25 Q. And you took [redacted] and she came, did she give

1  
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 5 WITNESS: DIRECT CROSS REDIRECT RECROSS  
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1 Mr. Epstein a massage?  
 2 A. Yes.  
 3 Q. Did she ever tell you anything inappropriate  
 4 had happened?  
 5 A. We never really talked about it.  
 6 Q. Did you ask them?  
 7 A. No.  
 8 Q. If you talk someone to Mr. Epstein's home to  
 9 have them give him a massage so they could earn money  
 10 and you could earn money, did you interpret what you  
 11 were doing was the same thing in essence that [redacted] was  
 12 doing?  
 13 MR. HOROWITZ: Form.  
 14 THE WITNESS: No.  
 15 BY MR. CRITTON:  
 16 Q. Why was it different, in your mind?  
 17 A. Because they wanted to go, and we were all  
 18 just kind of brainwashed by him. And at the time I knew  
 19 it was wrong, but I didn't know how it would affect them  
 20 or affect me in the future. And I was just confused by  
 21 everything at that time.  
 22 Q. You knew it was wrong, so what's confusing  
 23 about that?  
 24 A. I felt like it was wrong, but I, I just  
 25 thought it was -- I was just confused, and I just didn't

1 know how much it would affect me in the future and, you  
2 know, what kind of effects it would have on them. And,  
3 you know, that's why I feel bad about it now, but at the  
4 time I was confused and I didn't know.

5 Q. Well, let me ask you this. Have you ever  
6 talked with [REDACTED] about her experience with Mr. Epstein,  
7 ever?

8 A. No. She is in [REDACTED] now. I don't know, we  
9 don't really talk.

10 Q. What's she doing in [REDACTED] now?

11 A. She lives there now with her sister.

12 Q. [REDACTED]?

13 A. Yeah.

14 Q. Is her mom [REDACTED]?

15 A. Yes.

16 Q. Her dad?

17 A. Yes.

18 Q. So they are all [REDACTED]. Why did they go  
19 back to [REDACTED], if you know?

20 A. Because their green card expired.

21 Q. Let me ask you again. Did [REDACTED] ever tell you  
22 anything bad happened at Mr. Epstein's, or  
23 inappropriate?

24 A. I don't remember.

25 Q. So at least -- did you only take her the one

1 Q. But at least as you sit here today, you can't  
2 remember anything unusual about her coming down from  
3 giving Mr. Epstein a massage; would that be a fair  
4 statement?

5 A. I mean yeah, I don't remember.

6 Q. Same thing with F.E., you don't remember  
7 anything that stands out in your mind when she came  
8 downstairs because you were in the kitchen, right?

9 A. Yeah.

10 Q. Do you remember anything unusual or did she  
11 say anything or did she react or have any appearance --  
12 strike that.

13 Did F.E. either say anything that caused you  
14 any concern or did you observe any facial features or  
15 anything that she did or the way she acted that would  
16 have caused you any concern that you can remember today?

17 A. Not that I can remember.

18 Q. Those are the only two people you ever took to  
19 Mr. Epstein's?

20 A. Yes.

21 Q. You went down and had an interview or an  
22 evaluation by Dr. Kliman, who was the psychiatrist who  
23 had been hired from San Francisco to evaluate his  
24 clients, including you, correct?

25 A. Yes.

1 time?

2 A. Yes.

3 Q. Do you know whether she ever went another  
4 time?

5 A. I don't know.

6 Q. All right. But when she came down from giving  
7 Mr. Epstein a massage, she seemed to be in good spirits,  
8 didn't say anything bad had happened; fair?

9 A. She didn't really talk about it.

10 Q. Did she appear to be upset in any way?

11 A. I don't, I don't remember.

12 Q. If she had been upset, that's something you  
13 generally would remember, wouldn't you, if she was upset  
14 or emotional about it?

15 A. It was so long ago, I just remember taking her  
16 there. I don't remember how she reacted or what  
17 happened.

18 Q. Did you drive her in your car? You were the  
19 transporter?

20 A. I don't remember.

21 Q. Was [REDACTED] able to drive at the time?

22 A. Yes.

23 Q. But you went with her, so either she drove or  
24 you drove?

25 A. Yes.

1 Q. And you had to fly down from Orlando, true?

2 A. Yes.

3 Q. Do you remember telling Jane Doe 4 about your  
4 experience for the evaluation with Dr. Kliman?

5 A. Yes.

6 Q. And do you remember telling her that you were  
7 supposed to cry a lot and be very emotional during the  
8 course of the --

9 A. No, I never --

10 Q. I need to finish the question, ma'am.

11 Isn't it true you told Jane Doe 4 that you  
12 cried a lot during the interview and tried to be very  
13 emotional, because that's what you were supposed to do?

14 A. No.

15 Q. So if you told Jane Doe 4 that, or if Jane  
16 Doe 4 has said that to anyone, that would be a lie?

17 A. Yes.

18 MR. HOROWITZ: Form.

19 BY MR. CRITTON:

20 Q. If I use the term crocodile tear, does that  
21 mean anything to you? Do you know what a crocodile tear  
22 is?

23 A. Yes.

24 Q. What is it?

25 A. When somebody fake cries.

1 Q. Let me go back to when Jane Doe 4 was living  
2 with you this last summer, or I'm sorry, the summer of  
3 '08 and she told you that she had filed a suit against  
4 Mr. Epstein.

5 As of that date, were you aware of anyone else  
6 who had filed suits against Mr. Epstein?

7 A. No.

8 Q. As you sit here today, other than yourself and  
9 Jane Doe 4, are you aware of any other plaintiffs or  
10 individuals who are plaintiffs in lawsuits against  
11 Mr. Epstein?

12 A. Yes.

13 Q. Who?

14 A. Jane Doe 3.

15 Q. How do you know [REDACTED] is a plaintiff in a  
16 lawsuit?

17 A. Because she is my friend and she told me.

18 Q. And that's Jane Doe 3?

19 A. Yes.

20 Q. Were you aware or has Jane Doe 3 told you  
21 whether she has given a deposition?

22 A. Yes.

23 Q. Okay. What did she say about it?

24 A. She said that you looked exactly like Jeffrey  
25 Epstein.

1 Q. Did she tell you how nice and polite I was and  
2 reasonable?

3 A. Yes.

4 Q. Good.

5 MR. HOROWITZ: She did?

6 THE WITNESS: No.

7 BY MR. CRITTON:

8 Q. I'm taking that as the truth.

9 A. That's a joke.

10 Q. All right. You don't think I look like  
11 Mr. Epstein, do you?

12 A. Yes, kind of.

13 Q. I think that's just, I think that's the big  
14 pitch, so you all can make that pitch at trial. It's a  
15 nice touch, but I'm not moved by it.

16 MR. HOROWITZ: Move to strike.

17 BY MR. CRITTON:

18 Q. What else did Jane Doe 3 tell you about her  
19 deposition?

20 A. She didn't really tell me anything about it.  
21 She just basically said she came in here and did it.

22 Q. Were you aware that she had been at  
23 Mr. Epstein's home during the time she was going?

24 A. I don't remember.

25 Q. Do you know how she came to be at

1 Mr. Epstein's home?

2 A. No.

3 Q. Did she ever talk to you about what occurred  
4 or what she alleges occurred at Mr. Epstein's home?

5 A. No.

6 Q. All right. Are you aware of anyone else other  
7 than Jane Doe 3 and Jane Doe 4 who are plaintiffs?

8 A. Just N.R.

9 Q. And who is she? Again, a student at [REDACTED]  
10 [REDACTED] with you all?

11 A. Yes.

12 Q. Same grade?

13 A. She's a grade ahead of me.

14 Q. And did she tell you that she's a plaintiff in  
15 a lawsuit?

16 A. No, we were just talking about it and somehow  
17 she found out that I had a lawsuit and was asking me  
18 about it and she said that she had one, and that's all.

19 Q. Did she tell you who her lawyer was?

20 A. No.

21 Q. Did she -- when did you last talk to N.R. --  
22 let me start again.

23 When did you have this conversation with N.R.  
24 about the lawsuit?

25 A. I believe it was over Christmas break, I

1 think.

2 Q. Christmas --

3 A. I don't know, I was home like on break. I  
4 don't know if it was Christmas break or not.

5 Q. Well --

6 A. I was just, like I come home a lot to visit my  
7 parents.

8 Q. Are you still in school right now?

9 A. Yes.

10 Q. So when was the last time you were home,  
11 Christmas before now?

12 A. No, I came home recently to visit them, like  
13 last month.

14 Q. Was that when you talked to N.R.?

15 A. I think so.

16 Q. So it would have been approximately February  
17 of 2010?

18 A. Yes.

19 Q. And was she at your house or did you see her  
20 at a bar or were you out at a club or --

21 A. I forget where I saw her. I ran into her --  
22 oh, we were at Duffy's. We all went --

23 Q. Which Duffy's?

24 A. -- to dinner. On Northlake.

25 Q. Right near I-95?

1 A. Yes.  
 2 Q. Who was there other than you and N.R.?  
 3 A. Just some friends from high school.  
 4 Q. Any other people that you know? Was Jane  
 5 Doe 4 there?  
 6 A. No, Jane Doe 4 wasn't there.  
 7 Q. Jane Doe 3, was she there?  
 8 A. No.  
 9 Q. Anyone else that you know, any of the other  
 10 people you knew went to Mr. Epstein's home?  
 11 A. No.  
 12 Q. And N.R. said that she was going to file or  
 13 she was a plaintiff also in a lawsuit?  
 14 A. Yes.  
 15 Q. How did she know that you were a plaintiff?  
 16 A. I don't know who told her.  
 17 Q. Were you upset that she knew?  
 18 A. I mean she was one of my good friends in high  
 19 school and she kind of knew what happened, because I  
 20 told her before. So I, she kind of already knew, so I  
 21 wasn't that upset that she knew about that.  
 22 Q. What do you mean you told her about?  
 23 A. I mean she knew about me and Jane Doe 4 going  
 24 there. She went there before, so --  
 25 Q. Oh, she had gone there before you?

1 A. No. I don't, I don't remember when she had  
 2 gone. She went sometime in high school.  
 3 Q. Did she ever tell you about her experience of  
 4 going to Mr. Epstein's home?  
 5 A. No. I just knew she went.  
 6 Q. Do you know how many times she went?  
 7 A. No.  
 8 Q. Did you say "Why are you filing a lawsuit?"  
 9 A. No.  
 10 Q. So you don't know whether she has -- strike  
 11 that.  
 12 You don't know anything about her lawsuit  
 13 other than she has filed a lawsuit against Mr. Epstein?  
 14 A. Yes.  
 15 Q. So you mentioned N.R., Jane Doe 3, Jane Doe 4.  
 16 Anyone else that you are aware that was a  
 17 plaintiff?  
 18 A. No.  
 19 Q. Who have you told that you are a plaintiff in  
 20 a lawsuit?  
 21 A. Just those girls.  
 22 Q. So nobody else knows that you are a plaintiff?  
 23 A. No.  
 24 Q. How about [redacted]? Does [redacted] know you are a  
 25 plaintiff?

1 A. Well, yeah. She -- yeah.  
 2 Q. Okay. How does she know?  
 3 A. Because you guys asked her questions about me,  
 4 and I'm sure she assumed I was a plaintiff suing  
 5 Jeffrey.  
 6 Q. How about your friend [redacted] does she know that  
 7 you have brought a lawsuit?  
 8 MR. HOROWITZ: Form.  
 9 THE WITNESS: I'm sure [redacted] told her.  
 10 BY MR. CRITTON:  
 11 Q. Why would [redacted] tell her?  
 12 MR. HOROWITZ: Form.  
 13 THE WITNESS: Because they are friends.  
 14 BY MR. CRITTON:  
 15 Q. How do you know [redacted] and [redacted] are friends?  
 16 A. Because that's what I have heard.  
 17 Q. When is the last time you talked to [redacted]  
 18 A. Right around her brother's accident.  
 19 Q. Okay.  
 20 A. So probably, I don't know, like seven months  
 21 ago.  
 22 Q. That's the last time you have spoken with her?  
 23 A. Yes.  
 24 Q. Have you tried to call her or she tried to  
 25 contact you at all?

1 A. Not recently. I don't think so.  
 2 Q. After you said -- around the time of her  
 3 brother's accident, since that time, have you tried to  
 4 call her at all? Or seven months ago was the last time  
 5 you had any contact with her?  
 6 A. Yeah.  
 7 Q. Okay. At the time that Jane Doe 4 told you  
 8 that in the summer of '08 that she was bringing a  
 9 lawsuit against Mr. Epstein or had brought a lawsuit  
 10 against Mr. Epstein, had you contacted an attorney at  
 11 that point?  
 12 A. I don't remember.  
 13 Q. All right. Who was the first -- strike that.  
 14 Was it you or your parents who encouraged you  
 15 to bring a lawsuit?  
 16 MR. HOROWITZ: Form.  
 17 THE WITNESS: It was me.  
 18 BY MR. CRITTON:  
 19 Q. So your parents had nothing to do with you  
 20 bringing a lawsuit?  
 21 A. No.  
 22 Q. Are your parents aware now, were they aware at  
 23 the time you hired a lawyer?  
 24 A. Yes, I told them.  
 25 Q. Did you hire a lawyer before you told your

1 parents or were they involved in the decision?  
 2 A. No, I told them after.  
 3 Q. And who did you contact -- strike that.  
 4 How did you -- you know obviously Mr. Horowitz  
 5 is seated immediately to your left, correct?  
 6 A. Yes.  
 7 Q. Is he the first lawyer you met from that firm?  
 8 A. No. I met with Jeffrey Herman.  
 9 Q. How did you get in contact with Mr. Herman?  
 10 A. He called me.  
 11 Q. He called you?  
 12 A. Yes.  
 13 Q. And where did he call you from?  
 14 A. I don't know.  
 15 Q. Was it before or after Jane Doe 4 told you  
 16 that she was a plaintiff in a lawsuit?  
 17 A. I think it was before.  
 18 Q. All right. So at the time that Jane Doe 4  
 19 told you she was a plaintiff in a lawsuit, had you  
 20 already spoken with Mr. Herman?  
 21 MR. HOROWITZ: Form.  
 22 BY MR. CRITTON:  
 23 Q. Or did that occur after you spoke with Jane  
 24 Doe 4?  
 25 A. I don't know who had, who did it first. I

1 think it was me. I don't really know. I don't  
 2 remember.  
 3 Q. I'll represent that Jane Doe 4, Jane Doe 4's  
 4 lawsuit was filed well before yours. She's Jane Doe 4.  
 5 A. Yes.  
 6 Q. You are Jane Doe 7. Doesn't necessarily mean  
 7 one came, hired the lawyer earlier or not, but I can  
 8 tell you her lawsuit was filed months before yours was.  
 9 A. He called me originally at first, and then he  
 10 asked me if I knew any witnesses or anything, and I  
 11 think I gave him Jane Doe 4's number, but I never agreed  
 12 to start a lawsuit until later on.  
 13 Q. So when Mr. Herman called you, you gave him  
 14 Jane Doe 4 -- he called you about being a witness?  
 15 A. I believe so.  
 16 Q. All right. And did you talk to him?  
 17 A. Yes.  
 18 Q. Over the phone or in person?  
 19 A. Over the phone.  
 20 Q. And then you gave him the name of other  
 21 individuals?  
 22 A. Just Jane Doe 4, I think.  
 23 Q. And then sometime after you met with or Jane  
 24 Doe 4 was living with you in the summer, then did you  
 25 subsequently speak with him again, him meaning

1 Mr. Herman?  
 2 A. I don't, I don't remember when it was, but I  
 3 just met, just met with him and I --  
 4 MR. HOROWITZ: I'm going to ask you not to  
 5 discuss what --  
 6 MR. CRITTON: Just dealing with the time  
 7 sequence. Don't tell me what he said right now.  
 8 I'm not there yet.  
 9 MR. HOROWITZ: There you go.  
 10 BY MR. CRITTON:  
 11 Q. So if I understand the sequence correctly, you  
 12 got a phone call out of the blue from Mr. Herman about  
 13 Jeffrey Epstein.  
 14 A. Yes.  
 15 Q. All right. You spoke with him, and he asked  
 16 you a number of questions, right?  
 17 A. All he really asked me was if I, if I was  
 18 involved with Jeffrey Epstein, if I was a witness or  
 19 if -- I can't remember exactly what he asked me.  
 20 Q. I'm going to come back to that in just a  
 21 minute. Let me get the time sequence here if I can, Ms.  
 22 Jane Doe 7.  
 23 First time he called you, he called you, you  
 24 talked to him a little bit and you gave him the name of  
 25 Jane Doe 4?

1 A. Yes.  
 2 Q. Okay. And then sometime later you called him  
 3 or did he call you back?  
 4 A. I called him.  
 5 Q. How much time transpired between the first  
 6 call that he made and the second call that you made?  
 7 A. I don't know.  
 8 Q. Was it a week? Was it a month? Was it  
 9 months?  
 10 A. I don't remember how long it was.  
 11 Q. Okay. On the first conversation that you had,  
 12 how long did that conversation last?  
 13 A. Just like five minutes.  
 14 Q. Did he tell you he was representing anyone?  
 15 A. No.  
 16 Q. Did you ask him how he got your name?  
 17 A. No. I didn't know -- the first time he  
 18 called, I didn't -- I was kind of really, I didn't know  
 19 who was who and who was representing who. So I was,  
 20 just kind of told him that I would take his number and I  
 21 would think about it and call him back.  
 22 Q. Okay. Well, think about what?  
 23 A. Well, he asked me if we wanted to meet. And I  
 24 told him that I would think about it and call him back.  
 25 Q. Was he pitching basically I could represent

1 you in the case?

2 A. No. He just asked me if I knew about Jeffrey  
3 and witnessed what happened with Jeffrey, and that's  
4 about it. And he asked me if we wanted to meet and  
5 talk. And I said that I wasn't sure, you know, because  
6 I've had private detectives coming.

7 And I wasn't sure who was on whose side, so I  
8 told him that I would call him back.

9 Q. Was he soliciting or pitching his services to  
10 you as a lawyer?

11 MR. HOROWITZ: Form.

12 THE WITNESS: No.

13 BY MR. CRITTON:

14 Q. Well, why did he want to meet with you?

15 MR. HOROWITZ: Form.

16 BY MR. CRITTON:

17 Q. What did he tell you?

18 A. He just wanted to talk about the whole Jeffrey  
19 thing with me.

20 Q. Why would you want to talk with him about it?

21 MR. HOROWITZ: Form.

22 THE WITNESS: Because I heard that, you know,  
23 there's like stuff going on with, with people, so I  
24 kind of wanted to protect myself.  
25

1 BY MR. CRITTON:

2 Q. Why did she call you?

3 MR. HOROWITZ: Form.

4 THE WITNESS: She called me to fill me in on  
5 the case, and I knew she was like who she said she  
6 was, because Agent [REDACTED] at the FBI told me she  
7 would be calling me. She pretty much told me what  
8 was going on in his criminal case, and that's about  
9 it. And she said you might want to protect  
10 yourself and get a lawyer, and that's about it.

11 BY MR. CRITTON:

12 Q. Okay. Did she recommend anybody, any lawyers?

13 A. I don't remember.

14 Q. Do you remember her giving you any names of a  
15 lawyer saying "I'm going to give you three names," or  
16 "If you need some help finding a lawyer, I'll give you a  
17 name"?

18 A. She said if I wanted a lawyer, to call back.  
19 And she had a list, I think, but she didn't recommend  
20 anybody.

21 Q. Did you ever call her back for her  
22 recommendation?

23 A. No. I talked to Agent [REDACTED] about it, and  
24 she said basically what I was supposed to do. And she  
25 said it was up to me basically if I wanted to hire a

1 BY MR. CRITTON:

2 Q. What did you hear was going on with people?

3 A. Nothing. I just heard that, it was when -- I  
4 forget who called me and said -- I think it was Maria or  
5 something. She said, you know, to protect yourself, you  
6 might want to get a lawyer.

7 Q. Who is Maria, [REDACTED] [REDACTED]?

8 A. I think so.

9 Q. Was that the US attorney?

10 A. Yes.

11 Q. And had you ever met with [REDACTED] [REDACTED]?

12 A. No.

13 Q. You never met the lady?

14 A. No.

15 Q. So somebody who you just referred to as [REDACTED]  
16 calls you out of the blue. Why would --

17 A. She --

18 Q. Let me finish my question.

19 You said you -- let me ask you this. Did the  
20 [REDACTED] lady, who you have now identified as [REDACTED]  
21 [REDACTED], assistant US attorney, did she call you  
22 before Mr. Herman or after Mr. Herman?

23 MR. HOROWITZ: Form.

24 THE WITNESS: Before.  
25

1 lawyer or not.

2 Q. Did Agent [REDACTED] give you any names?

3 A. No.

4 Q. Did anyone from the FBI or US attorney's  
5 office ever give you a name of a lawyer --

6 A. No.

7 Q. -- to contact?

8 A. No.

9 Q. Did you speak with -- let me get back.

10 When you spoke with Ms. [REDACTED] [REDACTED], was  
11 that before or after Mr. Herman contacted you?

12 A. It was before.

13 Q. And then how much time transpired or passed  
14 before Mr. Herman contacted you about whether you were  
15 involved or to ask you questions about Jeffrey Epstein?

16 A. About a couple of months.

17 Q. And do you know when Mr. Herman approximately  
18 timewise called you?

19 A. No.

20 Q. Was it before Jane Doe 4 moved in with you  
21 that summer?

22 A. Yes.

23 Q. Was it shortly after the [REDACTED] police had  
24 contacted you?

25 A. No. It was a little while after that.

1 Q. Was it after the FBI interview?  
 2 A. Yes.  
 3 Q. Do you know when the FBI interview took place?  
 4 A. I think I was a sophomore in college or  
 5 maybe --  
 6 Q. That's '05, that would have been --  
 7 A. I think I was a sophomore or freshman.  
 8 Q. So that would have been what, approximately  
 9 '07?  
 10 A. Yes.  
 11 Q. Let me just stick with -- so when Mr. Herman  
 12 called you the first time, did he say what he was doing?  
 13 He obviously wanted to get some information about  
 14 Jeffrey Epstein and you, right?  
 15 MR. HOROWITZ: Form.  
 16 THE WITNESS: It didn't sound like it.  
 17 BY MR. CRITTON:  
 18 Q. Did you say "How did you get my name?"  
 19 A. No.  
 20 Q. Were you surprised that some lawyer out of the  
 21 blue called you to ask you about Jeffrey Epstein and you  
 22 didn't know who they were or how they had gotten your  
 23 name?  
 24 A. I thought -- I had no idea. That's why I  
 25 didn't agree to meet with him at first, because I didn't

1 know if he was, you know, on your side or their side or  
 2 trying to check me or whatever, so that's why I waited a  
 3 little bit to call him back.  
 4 Q. When you did call him back, however much time  
 5 transpired, what did you say to him?  
 6 MR. HOROWITZ: We're going to assert the  
 7 privilege on that, but you can make the proffer.  
 8 BY MR. CRITTON:  
 9 Q. You called him back, correct?  
 10 A. Yes.  
 11 Q. Okay. All you knew, he was a lawyer?  
 12 A. Yes.  
 13 Q. You didn't know who he represented?  
 14 A. No.  
 15 Q. If anyone?  
 16 A. No.  
 17 Q. Okay. He could have been Mr. Epstein's  
 18 lawyer, he could have been anybody's lawyer, for all you  
 19 knew, right?  
 20 A. I mean he told me he -- like no, I think he  
 21 told me he wasn't -- he was like representing -- I don't  
 22 know, he didn't say -- I don't know. I don't remember  
 23 why I actually called him back.  
 24 Q. Why did you call him back?  
 25 A. Because I wanted to hear what he had to say.

1 Q. Okay. And did you investigate him at all?  
 2 A. Yes.  
 3 Q. Did you go online?  
 4 A. I looked his name up.  
 5 Q. Where?  
 6 A. Online.  
 7 Q. And what did you find out?  
 8 A. That he was a sexual abuse attorney.  
 9 Q. And did you ask him before you hired him  
 10 whether he was representing any other people associated  
 11 with the Epstein matter?  
 12 A. No.  
 13 Q. When you called him back and before you hired  
 14 him, did you ask him how he ever got your name?  
 15 A. No.  
 16 MR. HOROWITZ: I'm going to assert the  
 17 privilege. I understand what you're trying to do,  
 18 but I'm going to assert the privilege as to the  
 19 conversation in that the entire conversation was  
 20 leading towards the result of obtaining a lawyer.  
 21 So that's my position, and we can --  
 22 BY MR. CRITTON:  
 23 Q. Are you going to follow your lawyer's -- if he  
 24 tells you -- if he claims a privilege, are you asserting  
 25 that privilege?

1 A. Yes.  
 2 MR. HOROWITZ: Yes. I just want to tell her  
 3 what I'm invoking.  
 4 As to this second telephone conversation, I'm  
 5 instructing you that you have a privilege not to  
 6 answer questions about the second conversation.  
 7 THE WITNESS: Okay.  
 8 BY MR. CRITTON:  
 9 Q. Did you hire Mr. Herman in the course of the  
 10 second conversation? Just yes or no.  
 11 A. He came to Orlando and we met and then --  
 12 Q. No, no. We'll get there.  
 13 In the second conversation, did you say "I  
 14 want to hire you" or did you just say --  
 15 A. No.  
 16 Q. -- "I'd like to meet with you"?  
 17 A. "I'd like to meet with you."  
 18 Q. Okay. So how long did the second conversation  
 19 last?  
 20 A. Not long.  
 21 Q. Five minutes?  
 22 A. Just about.  
 23 Q. What did you tell him?  
 24 MR. HOROWITZ: I'll instruct her not to  
 25 answer. We'll assert the privilege, a privilege,

1 the attorney/client privilege.

2 MR. CRITTON: I understand.

3 BY MR. CRITTON:

4 Q. And you are going to follow his direction,  
5 correct?

6 A. Yes.

7 Q. And until Mr. Herman came to Orlando -- strike  
8 that.

9 How much time passed between the second  
10 conversation and Mr. Herman came to Orlando?

11 A. Not long. Maybe a couple weeks.

12 Q. Did anyone else come up with Mr. Herman to  
13 meet with you?

14 A. No.

15 Q. Just you and Mr. Herman met?

16 A. Yes.

17 Q. Where did you meet?

18 A. At Starbuck's.

19 Q. Okay. And did you sign an agreement then to  
20 have him represent you?

21 A. After I met with him and heard everything he  
22 said, yes, I did.

23 Q. Okay. Before that, that is, before you  
24 actually hired him, had you discussed with him what had  
25 happened to you, that is -- well, let me strike that.

1 In the second conversation did you give him  
2 any information as a witness as distinct from your own  
3 personal circumstances?

4 MR. HOROWITZ: I have to assert the privilege.

5 BY MR. CRITTON:

6 Q. And you are going to follow his direction?

7 MR. HOROWITZ: Yes. Good try.

8 MR. CRITTON: That's not a good try. Just --

9 BY MR. CRITTON:

10 Q. Has Jane Doe 4 told you -- let me strike that.

11 I'd ask you to assume that she's brought the  
12 same \$50 million lawsuit that you have, different facts,  
13 but she wants 50 million bucks too, at least in her  
14 complaint that she's asserted against Mr. Epstein.

15 Did she ever tell you any injuries or damages  
16 that she ever sustained as a result of being at  
17 Mr. Epstein's home? Has she ever said anything to you  
18 about it?

19 A. We never really talked about her.

20 Q. Even through today's date, she's never told  
21 you any damages or how she was damaged or any injuries,  
22 psychological or otherwise, that she ever sustained at  
23 Mr. Epstein's house; is that correct?

24 She's never discussed that with you?

25 A. I mean other than being humiliated by

1 everybody and her parents finding out and her sister  
2 finding out and her being depressed and humiliated, I  
3 mean yeah, I would assume that's some trauma for her.

4 Q. Okay. Has she told you she's depressed?

5 A. Yeah, and when she found, her parents found  
6 out and all that, she was depressed, she told me.

7 Q. The way you've described it is Jane Doe 4's  
8 main emotional or psychological -- let me strike that.

9 Her main psychological injury from at least  
10 the way you've described it is she's been humiliated and  
11 depressed because somebody other than her friends, in  
12 particular, her parents and her sister, found out that  
13 she had gone to Mr. Epstein's house?

14 A. Not from that. From just going when she was  
15 younger. She regrets it, and she even told me I wish I  
16 never went when I was younger. I was confused and --

17 Q. She -- I'm sorry.

18 A. Go ahead.

19 Q. Did she tell you that she went -- well, you  
20 knew she went both before she was 18 and after she was  
21 18, right?

22 A. Yeah, I guess.

23 Q. All right. And did she tell you she was more  
24 confused when she was 17 than when she was 18, or did  
25 she ever describe to you that there was a difference

1 when she went at 17 or 18?

2 A. I don't know. She never described anything to  
3 me.

4 Q. Did she ever say "Gees, the day I turned 18  
5 and was a freshman at college, I still went to see  
6 Mr. Epstein"?

7 A. No.

8 Q. Okay. Did she ever say, "Well, gee, just  
9 before I turned 18, I had these emotional injuries, but  
10 at 18 everything was okay when I went to Mr. Epstein's"?

11 Did she ever say that to you?

12 MR. HOROWITZ: Form.

13 THE WITNESS: No.

14 BY MR. CRITTON:

15 Q. All right. Did she ever distinguish to you  
16 having been to Mr. Epstein's before she was 18 or after  
17 she was 18; that is, that any time period was different  
18 for her?

19 A. I don't remember.

20 Q. You don't remember her telling you that,  
21 correct?

22 A. No -- yes. I don't remember her telling me.

23 Q. All right, I understand.

24 Now you've known Jane Doe 4 for a long time?

25 A. Yes.

1 Q. Since '02, I think you told me.  
 2 She's been through some rather traumatic  
 3 events in her life, has she not?  
 4 A. I guess you could say that.  
 5 Q. Well, you know she's been arrested before?  
 6 A. Yes, when we were younger.  
 7 Q. Pardon?  
 8 A. When we were younger.  
 9 Q. All right. And she had a boyfriend named  
 10 [REDACTED]. You knew [REDACTED], didn't you?  
 11 A. Yes.  
 12 Q. What did you think of [REDACTED]? Pretty  
 13 upstanding, great guy?  
 14 A. No.  
 15 Q. Okay. He was a jerk, wasn't he?  
 16 A. Yeah.  
 17 Q. Pardon?  
 18 A. Yes.  
 19 Q. And [REDACTED] beat Jane Doe 4, didn't he?  
 20 Physically abused her?  
 21 A. I mean he pushed her. He didn't beat her up,  
 22 but yes, he pushed her before.  
 23 Q. Did you ever see him slam her face down into  
 24 the hood of the car, into the dashboard of a car?  
 25 A. No.

1 MR. HOROWITZ: Form.  
 2 BY MR. CRITTON:  
 3 Q. Are you aware, did she ever tell you that that  
 4 happened?  
 5 A. No.  
 6 Q. Did you see [REDACTED] spitting on her?  
 7 A. No.  
 8 Q. Did you see her spitting back at [REDACTED]?  
 9 A. No.  
 10 Q. Were you aware that had occurred?  
 11 A. No.  
 12 Q. Were you aware [REDACTED] was a drug addict?  
 13 A. Yes.  
 14 Q. Were you aware that he was an alcoholic?  
 15 MR. HOROWITZ: Form.  
 16 THE WITNESS: Yes.  
 17 BY MR. CRITTON:  
 18 Q. You were around when he verbally abused her  
 19 and called her awful names, weren't you?  
 20 A. One or two times.  
 21 Q. Okay. Did you ever hear him refer to her as a  
 22 whore?  
 23 MR. HOROWITZ: Form.  
 24 THE WITNESS: No.  
 25

1 BY MR. CRITTON:  
 2 Q. Did you ever hear him call her a [REDACTED]?  
 3 A. No.  
 4 Q. What kind of things did you hear [REDACTED] say  
 5 to her to verbally abuse her?  
 6 A. Just bitch, and I don't remember. We were in  
 7 high school. Just, I mean I never heard him call her a  
 8 whore or anything else you said.  
 9 Q. I'm sorry?  
 10 A. I said or anything else you said.  
 11 Q. But you were aware that he was both physically  
 12 and verbally abusive to her?  
 13 A. Yes.  
 14 Q. All right. And did you ever tell Jane Doe 4  
 15 "You got to get away from this guy, he's bad news"?  
 16 A. Yes.  
 17 Q. What was her reaction?  
 18 A. She was in love. So she didn't really --  
 19 Q. And she carried on a physical, a long-term  
 20 physical relationship with [REDACTED], did she not?  
 21 A. Yes.  
 22 Q. Did you ever, were you ever aware whether she  
 23 and [REDACTED] were pregnant?  
 24 MR. HOROWITZ: Form.  
 25 THE WITNESS: No.

1 MR. HOROWITZ: I know what you mean.  
 2 BY MR. CRITTON:  
 3 Q. Of course he can't be, but are you aware that  
 4 she became pregnant with [REDACTED]?  
 5 A. Yes.  
 6 Q. Did she tell you that?  
 7 A. Yes.  
 8 Q. On how many occasions did Jane Doe 4 disclose  
 9 to you that she had become pregnant with [REDACTED]?  
 10 MR. HOROWITZ: Form.  
 11 THE WITNESS: Just once.  
 12 BY MR. CRITTON:  
 13 Q. Okay. She never told you -- so let me strike  
 14 that. Are you aware that she became pregnant, even if  
 15 not with [REDACTED], on two other occasions?  
 16 MR. HOROWITZ: Object to the form, and let me  
 17 just, I have to say this. You are potentially  
 18 disclosing very intimate personal medical  
 19 information about one person to another, and I  
 20 think you are touching on some boundaries that you  
 21 shouldn't be going on, but go ahead.  
 22 BY MR. CRITTON:  
 23 Q. Do you want the question back?  
 24 A. No.  
 25 Q. No what? That was your answer?

1 A. I don't want the question back.  
 2 Q. Do you remember the question?  
 3 A. Yes.  
 4 Q. Okay. I don't.  
 5 (A portion of the record was read by the  
 6 reporter.)  
 7 MR. HOROWITZ: Form.  
 8 THE WITNESS: I don't think that we should  
 9 really be talking about her details, intimate  
 10 details.  
 11 BY MR. CRITTON:  
 12 Q. Can you answer my question?  
 13 MR. HOROWITZ: Just answer what you know.  
 14 THE WITNESS: I just told you I know once what  
 15 happened.  
 16 BY MR. CRITTON:  
 17 Q. That's all you know, that she became pregnant?  
 18 A. Yes.  
 19 Q. Did she tell you how the pregnancy was  
 20 terminated?  
 21 A. Abortion.  
 22 Q. Was she pretty upset about that?  
 23 A. Yes.  
 24 Q. What kind of drugs did [REDACTED] take? Was he a  
 25 seller? Let me strike this.

1 Was [REDACTED] also selling drugs?  
 2 A. I don't know.  
 3 Q. Did you ever see Jane Doe 4 use illegal drugs  
 4 with [REDACTED]?  
 5 A. No. Just drink.  
 6 Q. Okay. So you guys are best friends and --  
 7 A. She would never do it in front of me, because  
 8 I don't do it in front of her or I would never do  
 9 anything in front of her.  
 10 Q. If you do drugs, you don't do them in front of  
 11 her.  
 12 A. Well, she knows -- sorry, I didn't mean to say  
 13 that. She knows I don't do drugs, so if she ever did  
 14 drugs, she would never do it in front of me, because she  
 15 knew I was really against that in high school.  
 16 I was good. The most I would -- like I drank,  
 17 but so if she had ever done drugs with him, she wouldn't  
 18 have done it in front of me. She would just drink.  
 19 Q. So if she's used Xanax and she's used pot and  
 20 she's used ecstasy and if she's used cocaine, any other  
 21 drugs, that would be news to you?  
 22 A. I mean I know she did like some of that. I'm  
 23 not going to -- whatever. But I, but she wouldn't do it  
 24 in front of me, because she knew that I wasn't like  
 25 that.

1 Q. So at least in high school, you're saying that  
 2 you drank alcohol, right?  
 3 A. Yes.  
 4 Q. Even though you were underaged?  
 5 A. Yes.  
 6 Q. And did you use pot?  
 7 A. No, not in high school.  
 8 Q. Never?  
 9 A. No.  
 10 Q. Okay. Did you ever use any other type of  
 11 illegal drugs?  
 12 A. No.  
 13 Q. Any prescription drugs from someone else, like  
 14 a xanax or percocet or --  
 15 MR. HOROWITZ: Talking about high school?  
 16 MR. CRITTON: High school.  
 17 THE WITNESS: No.  
 18 BY MR. CRITTON:  
 19 Q. Since high school, you have continued to  
 20 drink?  
 21 A. Yes.  
 22 Q. And I've seen both in the Kliman report is you  
 23 continue to drink alcohol, sometimes you will drink to  
 24 excess?  
 25 A. Yes.

1 Q. All right. And as well, you have used pot?  
 2 A. Yes.  
 3 Q. Since high school. How often do you use  
 4 marijuana?  
 5 A. I have, hardly ever.  
 6 Q. Xanax, have you had Xanax?  
 7 A. No.  
 8 Q. Have you ever tried cocaine?  
 9 A. No.  
 10 Q. Never? So if someone says that you have used  
 11 cocaine and they have seen you, that would be a lie?  
 12 MR. HOROWITZ: Form.  
 13 THE WITNESS: I don't ever remember doing -- I  
 14 don't do drugs at all.  
 15 BY MR. CRITTON:  
 16 Q. My question is if someone says they have seen  
 17 you do coke, that would be a lie?  
 18 MR. HOROWITZ: Form.  
 19 BY MR. CRITTON:  
 20 Q. Or is it possible you did do coke and you just  
 21 don't remember?  
 22 A. I mean I might have tried it once, but I don't  
 23 do coke at all, so --  
 24 Q. Would the same thing be true of Xanax, that if  
 25 someone said they had seen you take Xanax, you may have

1 tried it once or twice, but you don't do it regularly?  
 2 A. That would have a lie. I don't do Xanax.  
 3 Q. You've never done it?  
 4 A. No, I don't do prescription drugs. Only thing  
 5 I have ever done is Adderall.  
 6 Q. Did you get that from friends?  
 7 A. Yes.  
 8 Q. Let me go to the FBI for just a minute. When  
 9 did the FBI contact you?  
 10 A. I believe it was my freshman year of college,  
 11 I think.  
 12 Q. Let's see, that would have been the '05-'06  
 13 school year?  
 14 A. Yes.  
 15 Q. And now you were at [REDACTED]?  
 16 A. Yes.  
 17 Q. And that's in Orlando. Is that a community  
 18 college?  
 19 A. Yes.  
 20 Q. I asked two questions there. It's an Orlando  
 21 community college, correct?  
 22 A. Yes.  
 23 Q. And did you get, did you graduate from  
 24 [REDACTED]?  
 25 A. Yes, I did.

1 Q. Did you get an AA degree?  
 2 A. Yes.  
 3 Q. In what?  
 4 A. Just general.  
 5 Q. Kind of liberal arts?  
 6 A. Yes.  
 7 Q. After getting your -- when did you graduate?  
 8 A. Around '07.  
 9 Q. Spring of '07?  
 10 A. Yes.  
 11 Q. And where did you go to school after that?  
 12 A. [REDACTED]  
 13 Q. [REDACTED], also in  
 14 Orlando?  
 15 A. Yes.  
 16 Q. And have you graduated from [REDACTED] yet?  
 17 A. Not yet.  
 18 Q. So if -- you would have started [REDACTED] in the  
 19 fall of '07?  
 20 A. Yes.  
 21 Q. So if you had two more years, you had two more  
 22 years to finish at [REDACTED], assuming you took full loads?  
 23 A. Yeah.  
 24 Q. All right. So '07 to '08 and '08 to '09, so  
 25 if you had finished in two years, you would have

1 finished in May of '09, correct?  
 2 A. Yes.  
 3 Q. But you are still there right now?  
 4 A. Yes.  
 5 Q. And why are you in your fifth year?  
 6 A. Because I'm getting a minor too.  
 7 Q. What was your major?  
 8 A. [REDACTED]  
 9 Q. What's your minor?  
 10 A. [REDACTED]  
 11 Q. And when did you decide to take a minor?  
 12 A. I decided about a year after I got there.  
 13 Q. So that's what, an extra year? In order to  
 14 get the courses that you want, you had to be there an  
 15 extra year?  
 16 A. Yeah, about. I mean I could really finish  
 17 this semester, but I wanted to study abroad for the  
 18 hospitality trip in the summer, so I'm just waiting for  
 19 that and then I'm graduating in the summer.  
 20 Q. At the end of the summer?  
 21 A. Yes.  
 22 Q. Where is the summer trip taking you?  
 23 A. To Italy.  
 24 Q. All right. Where will you go?  
 25 A. To Florence.

1 MR. HOROWITZ: Cool.  
 2 BY MR. CRITTON:  
 3 Q. How long will you be there?  
 4 A. For about a month.  
 5 Q. And this is through [REDACTED]?  
 6 A. Yes.  
 7 Q. And who pays for this, your parents?  
 8 A. I'm taking out loans for it.  
 9 Q. And your school, did your parents do Bright  
 10 Futures? Start again. Were you entitled to Bright  
 11 Futures?  
 12 A. No.  
 13 Q. Any form of the Bright Futures program?  
 14 A. No.  
 15 Q. There is another one.  
 16 A. No.  
 17 Q. How about did your parents do prepaid at all?  
 18 A. I don't know. I don't think so.  
 19 Q. Have your parents supported you while you have  
 20 been at least the four years in school?  
 21 MR. HOROWITZ: Form.  
 22 THE WITNESS: Yeah, I mean I always worked  
 23 too.  
 24 BY MR. CRITTON:  
 25 Q. Okay. Let me just go back to the FBI for just

1 a minute. So the FBI came to you during your freshman  
2 year at [REDACTED], which would have been '05-'06.

3 Did they come during the '05 time period, that  
4 is, shortly after the [REDACTED] police, or was it into  
5 the '06 time period?

6 A. I don't remember.

7 Q. Who came?

8 A. Agent [REDACTED].

9 Q. Just her?

10 A. Her and another guy. I forget his name.

11 Q. They drove to Orlando?

12 A. Yes.

13 Q. Where did you meet them?

14 A. Starbuck's.

15 Q. Same place you met Mr. Herman?

16 A. Yes.

17 Q. Did you meet anybody else there?

18 A. No.

19 Q. All right. So you are at Starbuck's. How  
20 much time did you spend with the FBI at Starbuck's?

21 A. Probably about two hours.

22 Q. Who bought the coffee, do you remember?

23 A. They did.

24 Q. All right. And did they take a taped  
25 statement from you at all?

1 strike that. What did they say to you first?

2 A. They just asked me what happened with Jeffrey  
3 and they said that, that I had to tell them, you know,  
4 exactly what happened.

5 So I admitted -- they asked me if I told the  
6 officers everything when they came, and I admitted that,  
7 you know, I didn't tell them everything.

8 And then so I just basically went into detail  
9 with them and, you know, told them everything about what  
10 happened.

11 Q. Okay. Now is it your testimony that you told  
12 them the truth?

13 A. Yes.

14 Q. Okay. Did you make any errors in what you  
15 told -- strike that.

16 Did you misrepresent, lie or deceive the FBI  
17 in any way?

18 A. No.

19 Q. So if I got the FBI statement, you would say  
20 that would be accurate even if you've testified  
21 differently today?

22 MR. HOROWITZ: Form.

23 BY MR. CRITTON:

24 Q. Right?

25 A. I mean yes. I told them, I didn't tell the

1 A. I can't remember if they did.

2 Q. Did they take a statement at all? Was anybody  
3 writing?

4 A. They took a statement, yeah.

5 Q. Did you ever sign anything?

6 A. I think so, yes.

7 Q. Have you ever seen the statement that you  
8 signed that you gave to the FBI?

9 A. No.

10 Q. Have you ever requested it?

11 A. No.

12 Q. Did they ever ask you to read it?

13 A. No.

14 Q. So you don't know whether they took down  
15 correctly what you told them?

16 A. Yeah, I mean I actually, I think they did have  
17 a tape recorder with them.

18 Q. Are you sure?

19 A. I think so, yes.

20 Q. Did they swear you to tell the truth?

21 MR. HOROWITZ: I don't know.

22 THE WITNESS: I can't remember. I'm pretty  
23 sure they did.

24 BY MR. CRITTON:

25 Q. Okay. And what did you tell them -- let me

1 cops everything, and I pretty much told them -- it took  
2 me awhile, but I told them, you know, what happened.

3 Q. Okay. After you talked with the FBI on that  
4 occasion, did they tell you that you might have the  
5 ability to bring a civil lawsuit for money?

6 A. No.

7 Q. Did they mention anything about a civil  
8 lawsuit?

9 A. No.

10 Q. Did they mention anything about any criminal  
11 charges that they were investigating?

12 A. Yes.

13 Q. Did they tell you why they were investigating  
14 criminal charges, that is, why it was a federal matter  
15 as distinct from a state matter?

16 A. Because I think he, I guess I think it got  
17 turned down by the state or something, because he hired  
18 great lawyers that represented him well, and I don't  
19 think -- I think the judge turned it down. So they, the  
20 federal government picked it up, because they didn't  
21 think it was fair, the sentence the state gave him.

22 Q. You mean the FBI said that to you?

23 A. Well, I think that's what they -- something  
24 like that, I don't know.

25 Q. You could have only gotten that idea from

1 them, because you didn't know at the time, did you?  
 2 A. Yeah, they just said it was a federal  
 3 investigation now, but now I know why.  
 4 Q. Did, at that time did they mention [REDACTED]  
 5 [REDACTED] at all, the assistant US attorney?  
 6 A. No, I don't think so.  
 7 Q. Did you ever get any papers from either the  
 8 FBI or from the US attorney's office?  
 9 A. I don't remember.  
 10 Q. When you said -- earlier today you said [REDACTED]  
 11 called. And then I said [REDACTED] and you said yes.  
 12 How many times have you spoken with [REDACTED]  
 13 [REDACTED]?  
 14 A. I think just once when she pretty much wrapped  
 15 up the whole case.  
 16 Q. When you say she wrapped up the case, at the  
 17 time that she called you to tell you about what was  
 18 going on, what did she tell you?  
 19 A. I don't remember exactly. She just said about  
 20 what was, told me what happened with the criminal case  
 21 or what was going on with it or something.  
 22 MR. CRITTON: Okay. Let's go about ten more  
 23 minutes. Is that all right?  
 24 MR. HOROWITZ: Are you okay?  
 25 THE WITNESS: Yes.

1 BY MR. CRITTON:  
 2 Q. Tell me, you were born in Pittsburgh?  
 3 A. Yes.  
 4 Q. You moved to Florida when you were a freshman  
 5 in high school?  
 6 A. Yes.  
 7 Q. Which would have been the 0 --  
 8 A. 2000.  
 9 Q. I'm sorry, 2000?  
 10 A. Yes.  
 11 MR. HOROWITZ: That doesn't sound right.  
 12 THE WITNESS: Or 2001, I think.  
 13 MR. HOROWITZ: I'm sorry.  
 14 THE WITNESS: Yeah, I think it was 2001.  
 15 MR. HOROWITZ: You are right, I'm wrong.  
 16 BY MR. CRITTON:  
 17 Q. And did you start -- so it would be 2001  
 18 through May approximately of 2002, right?  
 19 A. (Witness nods head up and down.)  
 20 Q. Would have been your freshman year?  
 21 A. I believe so.  
 22 Q. All right. Where did your parents move to?  
 23 A. They moved to [REDACTED].  
 24 Q. What was the address?  
 25 A. [REDACTED].

1 Q. [REDACTED]?  
 2 A. Just the letter [REDACTED].  
 3 Q. Okay. Do you have any siblings?  
 4 A. Just a brother.  
 5 Q. How old?  
 6 A. I think he's like 36, 37.  
 7 Q. Are you close?  
 8 A. Thirty-seven. No. I mean he lives in a  
 9 different state, so --  
 10 Q. You are how old now?  
 11 A. I am 22.  
 12 Q. So there is a 14-year difference between the  
 13 two of you?  
 14 A. I think, yeah. I think he's like 36 or 37.  
 15 Q. So when he was almost out of high school, you  
 16 were only four years old?  
 17 A. Yeah, I guess so.  
 18 Q. He would have been about 18, you would have  
 19 been about four, if there is a 14-year difference.  
 20 A. I remember him, he was always in college. He  
 21 was off to college and he would come home.  
 22 Q. Where did he go to college?  
 23 A. He went to IUP.  
 24 Q. IUP?  
 25 A. Uh huh.

1 Q. What's that?  
 2 A. That's in Indiana somewhere.  
 3 Q. What does he do for a living?  
 4 A. He's a cop.  
 5 Q. When the Palm Beach police officers called  
 6 you -- let me strike that.  
 7 Does your brother know that you were involved  
 8 with Mr. Epstein or that you are involved in a lawsuit?  
 9 A. I've never told him, but unless my parents  
 10 told him, I don't think so.  
 11 Q. When the police called, did you ever think of  
 12 calling your brother, who was a police officer at the  
 13 time?  
 14 A. No.  
 15 Q. Why not?  
 16 A. Because we're not, we don't really share  
 17 everything. Like he's a guy. I didn't want him to find  
 18 out what happened with Jeffrey.  
 19 Q. Your parents, when you moved down here,  
 20 describe your house for me that you moved in. The house  
 21 on [REDACTED] Road, did you live there during all four years in  
 22 high school?  
 23 A. Uh huh.  
 24 Q. Describe it for me. How big a house was it?  
 25 A. It was just like a three-bedroom house.

1 Q. Three bedroom, three bath, two bath?  
 2 A. Yeah.  
 3 Q. Did you have your own room?  
 4 A. Yes.  
 5 Q. Okay. And when you were what, 15, I saw in  
 6 Kliman's report you got your own car, a red Cavalier?  
 7 Yes?  
 8 A. Yes.  
 9 Q. Who bought that for you, Mom and Dad?  
 10 A. Yes.  
 11 Q. Brand new car?  
 12 A. No. It was used.  
 13 Q. And did you have that so you could use it  
 14 during high school?  
 15 A. Yes.  
 16 Q. Did you take that car with you then to  
 17 [redacted] ?  
 18 A. No.  
 19 Q. Did they give you another car?  
 20 A. I got into a car accident and the car got  
 21 totaled. And so yeah, so they got me a Mustang that I  
 22 use.  
 23 Q. Do you still have that today?  
 24 A. Yes.  
 25 Q. What year is that?

1 A. A '99.  
 2 Q. In addition, the house that you lived at on  
 3 some acreage?  
 4 A. It had, I think it's an acre.  
 5 Q. Pool?  
 6 A. Yes.  
 7 Q. In-ground pool?  
 8 A. Yes.  
 9 Q. And your mom and dad both had cars?  
 10 A. Yes.  
 11 Q. Did your -- what kind of work did your dad do?  
 12 A. He does work for the city, building  
 13 inspections.  
 14 Q. Now?  
 15 A. Yeah, he still does it now.  
 16 Q. Is he a contractor or was he at one point?  
 17 A. I think he does some contracting.  
 18 Q. So he inspects, does building inspections for  
 19 what city?  
 20 A. [redacted].  
 21 Q. The city of [redacted] ?  
 22 A. Uh huh.  
 23 Q. Yes?  
 24 A. Yes.  
 25 Q. So he's an employee of the city of [redacted] ?

1 A. Yes.  
 2 Q. And I saw someplace else, does he have a [redacted]  
 3 [redacted] too?  
 4 A. Yeah, me and him, we had started it when I was  
 5 younger, but we just kind of restarted it back up  
 6 recently. So we just sell [redacted]  
 7 [redacted]. It's like an online website.  
 8 Q. So you order them from like a Cushnut or  
 9 whoever happens to be --  
 10 A. Buyers.  
 11 Q. Who did you supply -- do you supply to [redacted]  
 12 [redacted] or individuals?  
 13 A. Just individuals. Like it's all online.  
 14 Q. So you've never had like a warehouse where you  
 15 actually buy and sell [redacted] carts?  
 16 A. No.  
 17 Q. It's strictly [redacted] parts?  
 18 A. And accessories, yes.  
 19 Q. How about your mom? Did she work outside the  
 20 home or was she a stay-at-home mom?  
 21 A. She worked at a craft store when I was  
 22 younger, and other than that, she was home.  
 23 And she just recently got a job, but she's  
 24 mostly home.  
 25 Q. What does she do now?

1 A. She works at a craft store again.  
 2 Q. Okay. But basically your dad was the sole  
 3 source of support for you and your family?  
 4 A. Yes.  
 5 Q. And that's through his being an employee of  
 6 the city of, the Town of [redacted] ?  
 7 A. Yes.  
 8 Q. All right. And would you have considered  
 9 yourself at least in your own mind, were you middle  
 10 class, upper middle class?  
 11 A. I would say middle class.  
 12 Q. Dad go to college?  
 13 A. No.  
 14 Q. Mom?  
 15 A. No.  
 16 Q. Are you the -- your brother went to college?  
 17 A. Yes.  
 18 Q. And now you've been able to go to college?  
 19 A. Yes.  
 20 Q. Pretty happy childhood?  
 21 A. Yes.  
 22 Q. Any kind of traumatic events in your childhood  
 23 in any way?  
 24 A. No.  
 25 Q. Anyone during your life that's very close to

1 you that has died, has passed away?  
 2 A. No.  
 3 Q. Ever been in any kind of automobile accidents  
 4 or any kind of accidents where you were a plaintiff in a  
 5 lawsuit -- well, where you were injured?  
 6 A. No.  
 7 Q. I saw a reference someplace to Cameron &  
 8 Gonzalez or something like that.  
 9 Do you know a lawyer named Glenn Cameron?  
 10 A. (Witness shakes head from side to side.)  
 11 Q. No? Doesn't mean anything to you?  
 12 A. Uh uh.  
 13 Q. Other than this lawsuit, have you ever been,  
 14 have you ever made a claim against anyone?  
 15 MR. HOROWITZ: Form.  
 16 BY MR. CRITTON:  
 17 Q. For any type of injuries?  
 18 A. No.  
 19 Q. Emotional or otherwise?  
 20 A. No.  
 21 Q. Have your parents ever been a plaintiff or a  
 22 defendant in a lawsuit?  
 23 MR. HOROWITZ: Form.  
 24 THE WITNESS: I don't think so.  
 25

1 BY MR. CRITTON:  
 2 Q. Have you ever been convicted of a crime?  
 3 A. No.  
 4 Q. Have you ever been arrested for any reason?  
 5 A. No.  
 6 Q. Have you ever had to hire the services of a  
 7 lawyer at any time before?  
 8 A. No.  
 9 MR. CRITTON: All right. Let's take a break  
 10 for lunch.  
 11 THE VIDEOGRAPHER: Going off the record at  
 12 1:11 p.m.  
 13 (A lunch recess was taken.)  
 14 THE VIDEOGRAPHER: We're back on the record at  
 15 1:56 p.m.  
 16 BY MR. CRITTON:  
 17 Q. Jane Doe 7, we're back from lunch now, and as  
 18 you know, I've done, certainly you know I've done the  
 19 deposition of Jane Doe 4. I have also done the  
 20 deposition of Ms. Jane Doe 3 in part.  
 21 Would it be correct to describe you as someone  
 22 who is interested in fashion, pretty much up on fashion,  
 23 likes to dress fashionably?  
 24 A. I guess you could say that.  
 25 Q. I'm not saying that's bad or good, and you

1 have on a nice Vineyard Vines shirt today.  
 2 A. Thank you. I like to look presentable.  
 3 Q. Pardon?  
 4 A. I said I wanted to look presentable.  
 5 Q. All right. Do you stay up on fashion like  
 6 Tory Burch, those kind of things, those types of  
 7 designers? Are you up on other designers? Do you like  
 8 to wear design clothes?  
 9 A. Just Abercrombie I like, and maybe not  
 10 anything too expensive, but --  
 11 Q. And during the time that you were in high  
 12 school and now that you are in college, and I know you  
 13 said you have worked as well part of the time that you  
 14 were in college, do you tend to buy, to keep up with  
 15 fashion? Like to dress up?  
 16 A. I try to.  
 17 Q. I'm sorry?  
 18 A. I try to, yes.  
 19 Q. All right. And during the time that you were  
 20 in high school, did your parents, were they able to  
 21 provide for you so that you always felt that you were  
 22 well dressed among your peers?  
 23 A. Actually, I had to buy all of my clothes.  
 24 Q. And were you working at the time?  
 25 A. Yes, I was.

1 Q. All right. When you say -- your parents never  
 2 bought you anything?  
 3 A. I mean they bought me a few things, but mostly  
 4 I bought my clothes.  
 5 Q. Starting when?  
 6 A. About when I was in high school.  
 7 Q. When you were a freshman?  
 8 A. Yeah.  
 9 Q. Well, when you were still living in  
 10 Pittsburgh, did you ever have a job?  
 11 A. No.  
 12 Q. Okay. When you started working in, or when  
 13 you moved down to South Florida in your freshman year,  
 14 did you have a job?  
 15 A. No.  
 16 Q. When did you first obtain any kind of  
 17 employment?  
 18 A. I first got a job, I think it was, I was at, I  
 19 worked at Ultimate Fitness, and I think that was when I  
 20 was 16, I think.  
 21 Q. Actually you say in your answer to  
 22 interrogatory number two, which is Exhibit 2, you say  
 23 your first job was at Ultimate Fitness out in Wellington  
 24 at the kids club at the front desk in 2004, 2005, which  
 25 would have been your senior year?

1 A. Yes, it was my senior year.  
 2 Q. So would it be a correct statement up until  
 3 the time of your senior year, your parents provided for  
 4 you in terms of clothes and what you needed to wear or  
 5 what you needed for high school?  
 6 A. I mean yeah, they tried to.  
 7 Q. Sure. And you thought that you, amongst your  
 8 peers, you were well dressed?  
 9 A. I mean I tried to be.  
 10 Q. All right. And then when you started working  
 11 for Ultimate Fitness, and then it looks like during the  
 12 summer of '05 before you went to college, you worked at  
 13 Abercrombie & Fitch?  
 14 A. Yes.  
 15 Q. So you got a discount on what you bought?  
 16 A. Yes.  
 17 Q. With the money you use earned from Ultimate  
 18 Fitness and Abercrombie, did you use that to buy  
 19 clothes, purses, whatever else you wanted? Was that  
 20 kind of like your spending money?  
 21 A. Yes.  
 22 Q. With the money that you received from  
 23 Mr. Epstein, did you use that to buy clothes and other  
 24 knick-knacks, do fun things that you wanted to do?  
 25 A. I mean I actually saved a lot of it up until

1 college, but I'm sure I spent some of it on food and  
 2 clothes, I mean whatever.  
 3 Q. How much money did you earn during the time  
 4 that you went to Mr. Epstein's house?  
 5 A. I think it was around 2000 over --  
 6 Q. Did you put that on your tax return?  
 7 MR. HOROWITZ: Form.  
 8 THE WITNESS: No.  
 9 BY MR. CRITTON:  
 10 Q. Did you file taxes during that time period?  
 11 A. I didn't make enough money to have to file  
 12 taxes.  
 13 Q. When you worked at Ultimate in '04 and '05,  
 14 they would have given you -- were you an employee or  
 15 were you an independent contractor, they gave you a  
 16 1099?  
 17 A. Yes.  
 18 Q. Yes, a 1099?  
 19 A. Yes.  
 20 Q. Did you therefore have to pay taxes?  
 21 MR. HOROWITZ: Form.  
 22 BY MR. CRITTON:  
 23 Q. Let me withdraw that.  
 24 Did you have to fill out a tax return?  
 25 MR. HOROWITZ: Form.

1 THE WITNESS: Yes.  
 2 BY MR. CRITTON:  
 3 Q. Pardon?  
 4 A. Yes.  
 5 Q. Okay. So in the '04, for the '04 time period  
 6 that you were working for Ultimate, because they 1099'd  
 7 you, then you had to do like a 1040 form, tax return?  
 8 MR. HOROWITZ: Form.  
 9 BY MR. CRITTON:  
 10 Q. Did you put in any of the money you had  
 11 received from Mr. Epstein?  
 12 MR. HOROWITZ: Form.  
 13 THE WITNESS: He never made me fill out a tax  
 14 form, so --  
 15 BY MR. CRITTON:  
 16 Q. You wouldn't. Mr. Epstein is not the IRS, but  
 17 the IRS expects you to record income that you've  
 18 received.  
 19 MR. HOROWITZ: Form.  
 20 BY MR. CRITTON:  
 21 Q. Did you put that on your 2004 tax return?  
 22 A. No, I never filed taxes.  
 23 Q. Did you ever file a tax return?  
 24 A. I don't really know. I fill out whatever they  
 25 make me fill out for a job.

1 Q. I don't know what you have done or haven't  
 2 done. My question to you is have you ever filled out a  
 3 form to report your income to the IRS?  
 4 A. Yes.  
 5 Q. And did you start doing that when you first  
 6 started working for Ultimate?  
 7 A. Yes.  
 8 Q. During the time you worked for Ultimate, which  
 9 was 2004, which is one of the years that different  
 10 places that you have alleged that you were with  
 11 Mr. Epstein, did you ever report any of the income that  
 12 you received from Mr. Epstein?  
 13 MR. HOROWITZ: Form.  
 14 THE WITNESS: No.  
 15 BY MR. CRITTON:  
 16 Q. Okay. And some of the money that you did earn  
 17 from Mr. Epstein, if I understood it, you saved it and  
 18 you used it for college or during your college years?  
 19 A. I mean I saved it. I don't really remember  
 20 what I used it for.  
 21 Q. Okay. You indicated earlier that you would  
 22 drink alcohol prior to your turning 21, so you were  
 23 drinking as an underaged person, correct?  
 24 A. Yes.  
 25 Q. And it looks -- not looks, but from having

1 deposed Ms. Jane Doe 3 and Ms. Jane Doe 4, it appears  
2 that you all go to clubs and have been going to clubs  
3 for a long period of time.

4 MR. HOROWITZ: Form.

5 BY MR. CRITTON:

6 Q. Fair statement?

7 A. I mean yes, I go out.

8 Q. Okay. And before you were 21, did you have a  
9 fake ID?

10 A. Yes.

11 Q. All right. And when did you first start using  
12 a fake ID, ma'am?

13 A. I don't remember.

14 Q. Was it when you went away to college or did  
15 you have one when you were in high school?

16 A. I think I had one in high school.

17 Q. And obviously it said you were what, 21?

18 A. Eighteen.

19 Q. Well, fake ID to say you were 18?

20 A. To get into the clubs, you only needed to be  
21 18.

22 Q. So your first fake ID said you were 18 so you  
23 could get into the clubs?

24 A. (Witness nods head up and down.)

25 Q. Yes?

1 Q. Did you use the fake ID from time to time to  
2 get into clubs which required you to be 21 or to drink  
3 alcohol?

4 A. Yes.

5 Q. And you knew that that was a crime?

6 MR. HOROWITZ: Form.

7 THE WITNESS: Yes.

8 BY MR. CRITTON:

9 Q. And were you ever stopped by the police and --  
10 well, let me strike that.

11 Did the police ever look at your fake ID, that  
12 is, were you ever in a club when you were ID'd and  
13 someone said this isn't your ID?

14 A. No.

15 Q. You were able to successfully use the fake ID  
16 without ever being called on it; is that correct?

17 A. Right.

18 Q. And even though you knew it was a crime, you  
19 still did it, correct?

20 MR. HOROWITZ: Form.

21 BY MR. CRITTON:

22 Q. You still used the ID?

23 A. Yes.

24 Q. Any tattoos?

25 A. No.

1 A. Yes.

2 Q. And did you eventually obtain a fake ID that  
3 said you were 21?

4 A. Yes.

5 Q. All right. And how many different fake IDs  
6 did you have?

7 A. I don't remember.

8 Q. More than one?

9 A. Yeah. Maybe like two or three.

10 Q. And who did you get them from?

11 A. I don't remember.

12 Q. Did you have them made or was it a friend's  
13 older sister or something like that?

14 A. People that looked like me.

15 Q. And how would you get it? How would you get  
16 the fake ID?

17 A. Just gave it to me, people that looked like  
18 me.

19 Q. If they looked like you and they were over 21,  
20 they would give you their fake ID?

21 A. Yeah. I remember one girl that I worked with,  
22 she kind of looked like me and she gave me her ID  
23 because she had two of them.

24 Q. When she had to what?

25 A. She gave me her ID because she had two.

1 Q. Piercings?

2 A. Just my ears.

3 Q. During the time that you were -- through the  
4 time you were in high school, which would be the summer,  
5 I guess the summer of '05 before you went away to  
6 [REDACTED], did you and your parents go away for  
7 vacations?

8 A. We had just gone up to Pennsylvania to go  
9 visit my family up there, and we went down to Key West  
10 once or twice.

11 Q. Where did you stay when you went down to Key  
12 West?

13 A. We stayed in Islamorada at a hotel. Sorry, we  
14 went to Islamorada once, and then we went to Key West  
15 and stayed at a hotel down there.

16 Q. On another trip or the same trip?

17 A. Another trip.

18 Q. Have you ever been to the Bahamas?

19 A. Yes.

20 Q. Where?

21 A. Nassau.

22 Q. With whom did you go to Nassau?

23 A. I went on my senior cruise.

24 Q. Senior at [REDACTED] [REDACTED]?

25 A. Yes, a senior trip.

- 1 Q. For [REDACTED] [REDACTED]?
- 2 A. Yes.
- 3 Q. How many days were you gone?
- 4 A. Three days.
- 5 Q. Who were your roommates?
- 6 A. I think Jane Doe 4.
- 7 Q. Jane Doe 4?
- 8 A. Yes.
- 9 Q. Anyone else? How about Ms. Jane Doe 3, was
- 10 she there too?
- 11 A. No.
- 12 Q. Is she younger than you?
- 13 A. Yes.
- 14 Q. Other than the cruise to Nassau, is that the
- 15 only time you've been to the Bahamas?
- 16 A. Yes.
- 17 Q. Have you ever been, other than being
- 18 Pittsburgh -- I'm sorry, Pennsylvania when you have
- 19 driven up there and been to the Bahamas, have you ever
- 20 been outside of the state of Florida other than that?
- 21 A. Yes.
- 22 Q. Where have you gone?
- 23 A. I went to, for like my 21st birthday, me and a
- 24 group of girls went to Vegas.
- 25 Q. Where did you stay?

- 1 A. We stayed in The Palms.
- 2 Q. The Palms, all right. Upscale.
- 3 A. Well --
- 4 Q. Did you get to go upstairs on the spike where
- 5 the club was on the top of The Palms?
- 6 A. Oh, yeah. My friend's mom paid for like our
- 7 trip and then she paid for the hotel room, so we all --
- 8 Q. Who went?
- 9 A. Me and my friend [REDACTED] and then her friend
- 10 [REDACTED], and I forget the other girl's name that went.
- 11 Q. How many days were you in Vegas?
- 12 A. For about four days.
- 13 Q. She flew you out there from West [REDACTED]?
- 14 A. Well, I paid for my ticket.
- 15 Q. You paid for your ticket, but they paid for
- 16 the room, friend?
- 17 A. Yeah.
- 18 Q. All right. Where else have you been outside
- 19 the state of Florida?
- 20 A. I went to New York.
- 21 Q. When did you go to New York?
- 22 A. We went there on a spring break trip.
- 23 Q. Who is we?
- 24 A. Me and my friend [REDACTED], a different [REDACTED]
- 25 and my friend [REDACTED].

- 1 Q. Are they friends from [REDACTED]?
- 2 A. Yes.
- 3 Q. And when did you go to New York?
- 4 A. I went my sophomore year.
- 5 Q. At [REDACTED]?
- 6 A. Actually, maybe it was my junior year at [REDACTED].
- 7 I think.
- 8 Q. Were you there for five, six days?
- 9 A. I think we were there for like five days.
- 10 Q. And where did you stay?
- 11 A. Her aunt has a place in the city. She's like
- 12 a stockbroker and she has a place in the city she let us
- 13 stay at.
- 14 Q. Did you go see shows when you were there, any
- 15 shows?
- 16 A. No.
- 17 Q. Shopped?
- 18 A. We went to Canal Street.
- 19 Q. Any other trips outside the state of Florida?
- 20 A. Chicago.
- 21 Q. When did you go to Chicago?
- 22 A. We went there I think when I was a sophomore
- 23 in college or junior.
- 24 Q. And who, when you went to Chicago, with whom
- 25 did you go?

- 1 A. I went with Jane Doe 4.
- 2 Q. Which Jane Doe 4?
- 3 A. Jane Doe 4.
- 4 Q. Who else?
- 5 A. My friend [REDACTED].
- 6 Q. All right. Anyone else?
- 7 A. My other friend, [REDACTED].
- 8 Q. Is [REDACTED] the one you went to Vegas with?
- 9 A. Yes.
- 10 Q. Anyone else?
- 11 A. I don't think so, uh uh.
- 12 Q. How did you get up to Chicago?
- 13 A. A friend of mine, like it was my friend's
- 14 birthday.
- 15 Q. Which friend's.
- 16 A. My friend [REDACTED] it was her birthday, so we
- 17 went to -- my friend invited us up there for her
- 18 birthday.
- 19 Q. Okay. Where did you stay? Which hotel?
- 20 A. My friend has a place up there, so he let us
- 21 stay at his place.
- 22 Q. Your friend, it was your friend's birthday.
- 23 Is it a he?
- 24 A. Yes.
- 25 Q. What was his name?

1 A. Mario.  
 2 Q. Okay. And how do you know Mario?  
 3 A. He was, we met him in South Beach just like  
 4 with a friend.  
 5 Q. And who is we met him in South Beach?  
 6 A. Me and [REDACTED]  
 7 Q. [REDACTED]  
 8 A. [REDACTED]  
 9 Q. Did [REDACTED] go on this trip too?  
 10 A. No.  
 11 Q. Why didn't she go?  
 12 MR. HOROWITZ: Form.  
 13 THE WITNESS: She, I don't know, she was with  
 14 her boyfriend a lot.  
 15 BY MR. CRITTON:  
 16 Q. Was this after -- this was when you were a  
 17 sophomore where, at [REDACTED], second year at [REDACTED]?  
 18 A. I think so.  
 19 Q. Did [REDACTED] go too?  
 20 A. Oh, yeah, and [REDACTED].  
 21 Q. [REDACTED], she went too. See, I didn't go, but I  
 22 knew [REDACTED] went.  
 23 A. Actually, yeah, it was [REDACTED] birthday.  
 24 Sorry.  
 25 Q. Oh, it was [REDACTED] birthday?

1 A. Yes.  
 2 Q. Is [REDACTED] from Chicago?  
 3 A. No.  
 4 Q. I thought you said you went because it was --  
 5 maybe I misunderstood you.  
 6 A. It was [REDACTED], it was my friend's birthday,  
 7 her birthday, and that's why we went there. My friend  
 8 invited us to go because it was her birthday, and she  
 9 wanted to go somewhere for her birthday.  
 10 Q. And Mario, how old -- is Mario at [REDACTED] with  
 11 you?  
 12 A. No.  
 13 Q. What's Mario do for a living?  
 14 A. He works in like the hotel industry.  
 15 Q. Which hotel?  
 16 A. I have no idea what hotel. I know his dad  
 17 like renovates hotels, stuff like that.  
 18 Q. You met Mario in South Beach, you and [REDACTED] met  
 19 him?  
 20 A. Yes.  
 21 Q. Were you at a club down there?  
 22 A. Yeah, we went down for like the weekend, me  
 23 and her.  
 24 Q. Have you been down there to South Beach a  
 25 bunch of times for weekends?

1 A. Just every once in a while when I could get  
 2 away.  
 3 Q. Where do you stay? Stay at a hotel down  
 4 there?  
 5 A. Yeah, we usually find like a cheap hotel.  
 6 Q. Down on the beach or something?  
 7 A. Uh huh.  
 8 Q. Yes?  
 9 A. Yes.  
 10 Q. So it might be you and [REDACTED] or you and some of  
 11 your other friends that go down there?  
 12 A. Uh huh.  
 13 Q. Yes?  
 14 A. Yes.  
 15 Q. Which club did you meet Mario at?  
 16 A. I don't remember. It was so long ago.  
 17 Q. How long have you known Mario? Sophomore, you  
 18 are a senior, plus one year, so it would have been about  
 19 three years ago?  
 20 A. Yeah.  
 21 Q. Okay. How many times -- does Mario live in  
 22 Chicago?  
 23 A. Yeah, he has a place in Chicago and a place  
 24 like near Miami.  
 25 Q. Have you ever been to his place in Miami or

1 near Miami?  
 2 A. Yeah, we went there once.  
 3 Q. Who is we?  
 4 A. Me and [REDACTED]  
 5 Q. And when you went up to Chicago, did you stay  
 6 at Mario's place up there?  
 7 A. Yeah, he let us stay up there, because we  
 8 couldn't afford to get like a hotel room.  
 9 Q. Was Mario there at the time you were there?  
 10 A. Yeah.  
 11 Q. Okay. How big a place did he have in Chicago?  
 12 A. Just like a condo.  
 13 Q. I understand. Like a two-bedroom,  
 14 three-bedroom, two-bedroom, one bath, one bedroom?  
 15 A. I think it was, yeah, like two or three  
 16 bedrooms.  
 17 Q. And who stayed with you at Mario's?  
 18 A. All the girls. We all stayed in the room  
 19 together.  
 20 Q. And there was you, Jane Doe 4, Gonzalez, is  
 21 that --  
 22 A. Uh huh.  
 23 Q. And [REDACTED]?  
 24 A. Yeah.  
 25 Q. Was [REDACTED] there too?

1 A. Yeah.  
 2 Q. So there were five of you?  
 3 A. Uh huh.  
 4 Q. Yes?  
 5 A. Yes.  
 6 Q. How old is Mario?  
 7 A. I have no idea.  
 8 Q. Is he 15? Is he 20?  
 9 A. No.  
 10 Q. Is he 25? Is he 40?  
 11 A. No, he's late 20's.  
 12 Q. Late twenties. Are you sure he's not older  
 13 than that?  
 14 A. I mean I don't know.  
 15 Q. What's Mario's last name?  
 16 A. I have no idea.  
 17 Q. So you traveled to some guy's house in, or  
 18 condominium in Chicago and you don't know his name?  
 19 MR. HOROWITZ: Form.  
 20 THE WITNESS: I know it's Mario, but I forget  
 21 his last name. It's been like a while since I have  
 22 talked to him.  
 23 BY MR. CRITTON:  
 24 Q. When is the last time you did talk with Mario?  
 25 A. I honestly don't even remember. It's been a

1 while.  
 2 Q. How many times have you been to Chicago to  
 3 stay at his house?  
 4 A. Just once, that one trip we have been on.  
 5 Q. Are you sure you haven't been up there again?  
 6 A. No -- oh, actually I went up there one other  
 7 time. I have a friend that lives up there that we went  
 8 to go visit.  
 9 Q. So you went to Chicago a second time?  
 10 A. Yeah, I went there twice.  
 11 Q. Who is that friend?  
 12 A. My friend Dave. His brother plays for [REDACTED]  
 13 basketball, so I'm friends with his brother, and that's  
 14 how I met him.  
 15 THE VIDEOGRAPHER: Excuse me, miss, could you  
 16 not play with the mike, please?  
 17 THE WITNESS: Sorry.  
 18 BY MR. CRITTON:  
 19 Q. So Dave is the player at [REDACTED] or Dave is the  
 20 brother of the guy from [REDACTED] who plays basketball for  
 21 [REDACTED]?  
 22 A. Uh huh.  
 23 Q. Yes?  
 24 A. Yes.  
 25 Q. You know the player, the player for [REDACTED]?

1 A. Uh huh.  
 2 Q. So you met Dave through him?  
 3 A. Yes.  
 4 Q. All right. And so Dave had you up there to  
 5 stay at his house?  
 6 A. Well, yeah, I paid to go fly up there and  
 7 visit him, because we started like talking a little bit.  
 8 Like he was just a friend of mine.  
 9 Q. Did you pay for the ticket or did he pay?  
 10 A. I paid.  
 11 Q. And how long were you in Chicago?  
 12 A. Just for like the weekend I went up there.  
 13 Q. Had you met him down here in Orlando?  
 14 A. Yeah.  
 15 Q. And then he said why don't you come up for the  
 16 weekend?  
 17 A. Well, we talked for a little bit, because he's  
 18 always down for his brother's games, so we like made  
 19 friends, and then he asked me up. I wanted to come up  
 20 there and go visit for the weekend.  
 21 Q. Did you?  
 22 A. Yes.  
 23 Q. And just you?  
 24 A. Yes.  
 25 Q. And did you stay with him at his apartment?

1 A. Yes.  
 2 Q. Is Dave someone you've dated?  
 3 A. We didn't -- like we're just friends.  
 4 Q. Did you have any kind of sexual relationship  
 5 with David?  
 6 A. No.  
 7 Q. None? Just went up for the weekend?  
 8 A. Yeah.  
 9 Q. Did you talk to Mario when you were up seeing  
 10 Dave?  
 11 A. No.  
 12 Q. So Mario, you went up there -- how many days  
 13 were you in Chicago?  
 14 A. We went there for like four days, I think.  
 15 Q. And where did you go? What did you do when  
 16 you were up there?  
 17 A. He like just showed us around the city. He  
 18 had to work, so he kind of like let us go wherever we  
 19 wanted and just like told us the good spots to go.  
 20 We went like out to lunch and walked around  
 21 the city and took pictures, and we went out one night to  
 22 like one of the clubs up there.  
 23 Q. Okay. Did he have any other guys that he  
 24 introduced to you all when you was up there?  
 25 A. One other guy, but I forget his name.

1 Q. How about Charlie, does that sound familiar?  
 2 A. Yeah.  
 3 Q. Do you know what Charlie's last name is?  
 4 A. No idea.  
 5 Q. How old is Charlie?  
 6 A. He was an older guy.  
 7 Q. Fifties?  
 8 A. Yeah, he was older.  
 9 Q. And how did Charlie get introduced into the  
 10 mix, so to speak?  
 11 A. Just Mario knew him somehow, so he just  
 12 introduced us to Charlie.  
 13 Q. Why did he introduce you to Charlie?  
 14 MR. HOROWITZ: Form.  
 15 BY MR. CRITTON:  
 16 Q. Why did Charlie all of a sudden show up with  
 17 the five girls?  
 18 MR. HOROWITZ: Form.  
 19 THE WITNESS: He was showing us around  
 20 different hotels.  
 21 BY MR. CRITTON:  
 22 Q. So Mario, now his apartment is where, what  
 23 building, do you remember?  
 24 A. The John Hancock.  
 25 Q. And how about Charlie, where did he live?

1 A. I don't remember.  
 2 Q. Charlie, did he kind of hang around with you  
 3 guys during the four days you were up there?  
 4 A. He went out with us one night. Mario said it  
 5 was like one of his good friends.  
 6 Q. Did Mario buy anything for you all when you  
 7 were up there?  
 8 A. Just Jane Doe 4, he bought her like I think an  
 9 outfit.  
 10 Q. And why would he buy Jane Doe 4, did he  
 11 express why he bought Jane Doe 4 an outfit?  
 12 MR. HOROWITZ: Form.  
 13 THE WITNESS: Because she like didn't bring a  
 14 lot of cute outfits and she saw something she liked  
 15 in Bebe.  
 16 BY MR. CRITTON:  
 17 Q. So if Jane Doe 4 has testified that he bought  
 18 dresses for all of you at Bebe's, that would be  
 19 incorrect?  
 20 MR. HOROWITZ: Form.  
 21 THE WITNESS: Well, I mean he did. He bought  
 22 it for Jane Doe 4, he bought her clothes. And then  
 23 [REDACTED] was like "I want something because it's my  
 24 birthday," and then he was like, you know,  
 25 whatever. So he bought her something too.

1 BY MR. CRITTON:  
 2 Q. Did he buy you something too?  
 3 A. I mean yeah, but I was like kind of -- he  
 4 asked Jane Doe 4 first. It's not like we asked him to  
 5 by anything for us. She wanted to get something to go  
 6 out, because she didn't really like bring any cute  
 7 dresses.  
 8 And so we went into Bebe, and we never asked  
 9 him to buy anything. He was like asked Jane Doe 4, he  
 10 offered to buy her something.  
 11 Q. I asked -- I'm sorry, are you done?  
 12 A. Well, yeah. I mean he did pay for it, but I  
 13 never asked him to pay for anything for me.  
 14 Q. When I first asked the question, I said did he  
 15 buy anything for anyone, and you said he bought an  
 16 outfit for Jane Doe 4.  
 17 All right, then I asked you the question well,  
 18 did he buy anything for anybody else? Didn't he buy  
 19 dresses for other people? And then all of a sudden you  
 20 told me.  
 21 Why didn't you tell me that the first time  
 22 when I asked you?  
 23 MR. HOROWITZ: Form.  
 24 THE WITNESS: It's not like I asked him to buy  
 25 me anything. Just I was going to pay for it and

1 brought it to the register and then he offered to  
 2 pay for it because he was buying Jane Doe 4  
 3 something.  
 4 BY MR. CRITTON:  
 5 Q. Were you confused with my question when I  
 6 asked you whether he had bought you anything?  
 7 MR. HOROWITZ: Form.  
 8 THE WITNESS: Well, I wasn't -- I'm sorry, I  
 9 guess I was kind of --  
 10 BY MR. CRITTON:  
 11 Q. Again, if you don't understand my question,  
 12 ask me to repeat it or rephrase it. I asked you if he  
 13 bought anything for anyone else, and all you said was  
 14 Jane Doe 4.  
 15 So if I hadn't followed up the question, you  
 16 would have misled me, wouldn't you?  
 17 MR. HOROWITZ: Form.  
 18 THE WITNESS: I'm sorry, I didn't ask him to  
 19 buy anything for me. I was going to pay for it and  
 20 then he just offered.  
 21 BY MR. CRITTON:  
 22 Q. Did he buy any other gifts for anybody when  
 23 you were up there?  
 24 A. No, he just like took us out to lunch once.  
 25 Q. Did he pay for the trip up?

1 A. Yes, he did.  
 2 Q. And did he pay for food wherever you all went  
 3 if he was with you; that is, dinners or lunches?  
 4 A. Like not all of them, but some of them he took  
 5 us out.  
 6 Q. How about Charlie? Did he buy any lunches or  
 7 dinners when he was out with you?  
 8 A. Uh uh.  
 9 Q. No?  
 10 A. No.  
 11 Q. You are shaking your head. You need to answer  
 12 out loud, ma'am.  
 13 I think you said you have been to Mario's.  
 14 Have you ever seen Charlie since that one trip to  
 15 Chicago?  
 16 A. No.  
 17 Q. Did you ever see Mario when he came back to  
 18 Florida again?  
 19 A. He was down in Miami. He goes down there a  
 20 lot and he calls to hang out, but I like live in Orlando  
 21 so I can't go, you know, that much.  
 22 But no, I don't think since Chicago I have  
 23 seen him.  
 24 Q. How about anyone else? Did you ever have any  
 25 kind of relationship, intimate relationship with Mario?

1 A. No, not at all.  
 2 Q. Did you ever date him for any period of time?  
 3 A. No.  
 4 Q. Are you currently seeing any physicians,  
 5 psychiatrists, psychologists, mental health counselors,  
 6 professionals, for any reason which you allege is  
 7 associated with your visits to Mr. Epstein?  
 8 MR. HOROWITZ: Form.  
 9 THE WITNESS: No.  
 10 BY MR. CRITTON:  
 11 Q. When, prior to the time that you ever went to  
 12 Mr. Epstein's home, whatever year that was, '03, '04,  
 13 '05, for the first time, had you ever seen a  
 14 psychiatrist or psychologist or counselor for any  
 15 reason?  
 16 A. No.  
 17 Q. After you went to, or from the first time you  
 18 went to Mr. Epstein's home up until the last time, did  
 19 you ever see a physician, psychiatrist, psychologist,  
 20 mental health counselor, for any reason?  
 21 A. No.  
 22 Q. After the last time you went to Mr. Epstein's  
 23 home, whether it was in 2004 or 2005, did you ever see a  
 24 psychiatrist or a psychologist or mental health  
 25 professional for any reason separate and apart from the

1 Dr. Kliman, who your lawyer has hired to testify in this  
 2 case?  
 3 A. No.  
 4 Q. During the time that you have been, during the  
 5 time that you were in high school, I assume that you  
 6 were covered under your -- strike that.  
 7 Your dad has worked for the Town of [REDACTED]  
 8 since he first came to Florida?  
 9 A. Yeah.  
 10 Q. So he has a health program through the city,  
 11 true?  
 12 A. Uh huh.  
 13 Q. For health benefits?  
 14 A. Uh huh.  
 15 Q. Yes?  
 16 A. Yes.  
 17 Q. All right. And so any type of medical care or  
 18 treatment that you would need would be covered under  
 19 your dad's policy?  
 20 MR. HOROWITZ: Form.  
 21 BY MR. CRITTON:  
 22 Q. When you were in high school and through the  
 23 time you've been in college, as long as you are a  
 24 student, correct?  
 25 MR. HOROWITZ: Form.

1 THE WITNESS: Yeah, but there is like his down  
 2 payments and stuff. They don't cover everything.  
 3 BY MR. CRITTON:  
 4 Q. Nobody's does. All right, so my question to  
 5 you is your dad -- again recognizing you're a full-time  
 6 student, correct?  
 7 A. Uh huh.  
 8 Q. Yes?  
 9 A. Yes.  
 10 Q. So up through the current date, you had access  
 11 to medical care and treatment?  
 12 A. Yes.  
 13 MR. HOROWITZ: Form.  
 14 BY MR. CRITTON:  
 15 Q. Through your dad's health policy, is that  
 16 true?  
 17 A. Yes.  
 18 Q. All right. And with both, I believe  
 19 through -- well, let me strike that.  
 20 With [REDACTED], did they have a student health  
 21 center?  
 22 A. Yes.  
 23 Q. With [REDACTED], did they have a student health  
 24 center?  
 25 A. Yes.

1 Q. And both places as well provide for counseling  
2 for students who need counseling, for any type of issue,  
3 whether it's birth control, whether it's psychological  
4 problems, emotional issues, behavioral health issues, as  
5 well as physical problems, those services are made  
6 available through both [REDACTED] and through [REDACTED]?

7 MR. HOROWITZ: Form.

8 THE WITNESS: Yes.

9 BY MR. CRITTON:

10 Q. And if I understand your testimony, you have  
11 never used those services either through the school  
12 programs, either [REDACTED] or [REDACTED] -- first of all, you  
13 have never used those services through [REDACTED] or [REDACTED]  
14 as it relates to any issue associated with Mr. Epstein,  
15 true?

16 MR. HOROWITZ: Form.

17 THE WITNESS: Yes.

18 BY MR. CRITTON:

19 Q. And as well, even though your father has a  
20 health plan or a medical plan through the Town of Palm  
21 Beach which you are covered, you have not sought the  
22 services of any mental, psychologist, psychiatrist or  
23 mental health counselors, correct?

24 MR. HOROWITZ: Form.

25 THE WITNESS: Yes. First of all, there is

1 THE WITNESS: No.

2 BY MR. CRITTON:

3 Q. Has anyone ever told you you should see a  
4 psychiatrist or psychologist or a licensed mental health  
5 counselor other than your lawyers? I don't want to know  
6 what they said. I'm interested, but --

7 A. Jane Doe 4 told me, she said it would really  
8 help me if I saw a counselor because it's been helping  
9 her and --

10 MR. HOROWITZ: Move to strike Bob's laughter.

11 MR. CRITTON: I didn't laugh. It's news to  
12 me.

13 BY MR. CRITTON:

14 Q. Who has Jane Doe 4 told you, who is the  
15 counselor that Jane Doe 4 said that she's gone to as a  
16 result of any visits or the occasions that she had to go  
17 to Mr. Epstein's house?

18 A. I don't know his name.

19 Q. Did she tell you where he was?

20 A. I think down in Boca.

21 Q. Okay. Did she tell you -- we finished taking  
22 her deposition within the last maybe month and she  
23 hadn't seen anybody.

24 MR. HOROWITZ: Object to the form.

25

1 no -- I would never go to my school and tell  
2 anybody about what happened. I mean that's, I mean  
3 students probably work there, for all I know. And  
4 I don't want to get my dad and my mom involved.

5 And I mean I don't -- you know, that's  
6 something that's embarrassing to me and I don't  
7 want -- I mean it should be on me, not on them.

8 BY MR. CRITTON:

9 Q. Let me move to strike. Let me go back to my  
10 question.

11 My question solely was not the whys and the  
12 wherefors, but since you've been under your parents'  
13 health care plan, particularly your father's through the  
14 Town of [REDACTED], you have never sought counseling  
15 with a psychiatrist, psychologist, or a licensed mental  
16 health counselor relating to any issues associated with  
17 Mr. Epstein, correct?

18 MR. HOROWITZ: Form.

19 THE WITNESS: Yes.

20 BY MR. CRITTON:

21 Q. Would it also be a correct statement that  
22 physically, as a result of your having gone to  
23 Mr. Epstein's home, you were never physically injured in  
24 any way, were you?

25 MR. HOROWITZ: Form.

1 BY MR. CRITTON:

2 Q. Maybe other than some Christian counselor that  
3 she and [REDACTED] saw.

4 MR. HOROWITZ: Bob, you can't disclose that  
5 stuff. You just can't.

6 MR. CRITTON: Okay, well fine. If you want to  
7 move for some sort of protective order on this,  
8 that's fine.

9 MR. HOROWITZ: No, but I'm appealing to you so  
10 we don't have to do that. You can't disclose  
11 someone's confidential medical or therapy to  
12 another witness. You just can't do that. You can  
13 ask her what she knows, but you can't disclose it.

14 MR. CRITTON: Yes, but the perfect example is  
15 with this witness, she won't even answer a question  
16 that I ask unless I key her, and then if I actually  
17 know the answer to the question, then she will  
18 confirm it, but she's not giving me answers.

19 So you can argue or move for protective order  
20 wherever you think is appropriate under the  
21 circumstances.

22 BY MR. CRITTON:

23 Q. Let me ask you this. You say that Jane Doe 4  
24 has told you that she's gone -- did she ever tell you  
25 she saw a counselor up in the Stuart, Jensen Beach area?

1 A. No.  
 2 Q. Do you know who [REDACTED] is?  
 3 A. Yes.  
 4 Q. Have you ever met [REDACTED]?  
 5 A. Yes.  
 6 Q. Do you know what he does?  
 7 A. He does like construction and landscaping.  
 8 Q. All right. Do you know whether [REDACTED] has any  
 9 sort of drug problem?  
 10 A. No.  
 11 Q. Have you ever known that Mr. Bullard is  
 12 alleged to have been a seller of drugs?  
 13 MR. HOROWITZ: Form.  
 14 THE WITNESS: No.  
 15 BY MR. CRITTON:  
 16 Q. Do you know whether he takes drugs, illegal  
 17 drugs?  
 18 A. No.  
 19 Q. Has Jane Doe 4 told you that her relationship  
 20 with [REDACTED] is very positive, good relationship?  
 21 A. Yes.  
 22 Q. She seems to be very happy?  
 23 A. Yes.  
 24 Q. Is she currently working at all?  
 25 A. Yes.

1 Q. What kind of work is she doing now?  
 2 A. She's doing cleaning, like housecleaning and  
 3 stuff.  
 4 Q. She's a college graduate?  
 5 A. Yes. She's starting her own business, like  
 6 housecleaning.  
 7 Q. So she's going out, she's doing some cleaning  
 8 herself, kind of learn the business, and then she's  
 9 going to get people to work for her?  
 10 A. Yes.  
 11 Q. Did she say her business is going well, good,  
 12 bad or indifferent?  
 13 A. Yeah, she said it's going good.  
 14 Q. Do she and [REDACTED] have any plans to get  
 15 married?  
 16 MR. HOROWITZ: Form.  
 17 THE WITNESS: Not that I know of.  
 18 BY MR. CRITTON:  
 19 Q. She's living with him full time?  
 20 A. Yes.  
 21 Q. Do your parents know that Jane Doe 4 is a  
 22 plaintiff in one of these lawsuits or the lawsuit  
 23 against Mr. Epstein?  
 24 A. Yes, I think so.  
 25 Q. Do they know that Jane Doe 3 is?

1 A. I don't think so.  
 2 Q. How do they know Jane Doe 4 is a plaintiff?  
 3 A. Because she's one of my good friends.  
 4 Q. Did you tell your parents?  
 5 A. I think so.  
 6 Q. You said Jane Doe 4 told you that she had seen  
 7 a counselor in Boca. Did she say it was a man or a  
 8 female?  
 9 A. I think she said it was a male.  
 10 Q. And did she tell you when she started seeing  
 11 the counselor in Boca?  
 12 A. No.  
 13 Q. Did she tell you it had helped her?  
 14 A. Yes.  
 15 Q. And in what way?  
 16 A. She said it just helped her like just when she  
 17 is like emotional with the all the thing coming up, with  
 18 all the questions for the lawsuit and the media or  
 19 people -- well, not media, but, you know, when all her  
 20 friends found out and stuff, she was really emotional  
 21 and crying, and he just really helped her emotionally.  
 22 Q. What friends did she say found out?  
 23 A. Whoever you guys asked, talked to, I guess.  
 24 So I mean [REDACTED] -- I don't really remember everybody she  
 25 said.

1 Q. Did she tell you that before [REDACTED] was ever  
 2 deposed that she had already told him about having been  
 3 involved with Mr. Epstein?  
 4 A. I don't remember.  
 5 Q. Did she try to blame that on the lawyers in  
 6 some way?  
 7 MR. HOROWITZ: Form.  
 8 THE WITNESS: I don't think she told him, you  
 9 know, the extent of everything. I don't really  
 10 know what she told him.  
 11 BY MR. CRITTON:  
 12 Q. All right. So she told you that at least she  
 13 is seeing somebody, a male in Boca Raton?  
 14 A. Uh huh.  
 15 Q. Did she tell you how she had gotten to see  
 16 somebody in Boca?  
 17 A. No.  
 18 Q. So how long ago did she tell you this, in the  
 19 last month or so?  
 20 A. Yes.  
 21 Q. Okay. Did she, as a result of her telling you  
 22 you should see someone, have you made an appointment to  
 23 see anyone?  
 24 A. No. She told me that you guys are going to  
 25 depose her therapist, and that made me not want to see

1 anybody, because I don't want my whole life story, you  
2 know, to be out there.

3 Q. What whole life story?

4 A. I mean I don't feel comfortable talking to a  
5 therapist. Like I'd rather wait until everything is  
6 over with to talk to somebody. That's why I haven't  
7 done anything.

8 Q. Why? What makes you think talking to a  
9 therapist after the lawsuit is over is of any benefit to  
10 you?

11 A. Because like I had heard that you guys already  
12 deposed her therapist, and I don't want everything, you  
13 know, I say to be just public knowledge to every lawyer.

14 Q. You understood what you said to Dr. Kliman is  
15 public knowledge, in essence? It's public within the  
16 confines of this lawsuit. You understand that, don't  
17 you?

18 MR. HOROWITZ: Form.

19 THE WITNESS: Yes.

20 BY MR. CRITTON:

21 Q. And everything you have said to Dr. Hall is  
22 shared not only with me, but as well shared with your  
23 attorney, correct?

24 A. Yes.

25 Q. Okay. So what were you concerned that you

1 MR. HOROWITZ: Form.

2 THE WITNESS: That's what people say, but  
3 there are students that work in those offices, and  
4 I don't want people at my school like knowing my  
5 business.

6 BY MR. CRITTON:

7 Q. Did you try get some assistance? Did you talk  
8 to your parents and say "Hey, look, I think it would be  
9 of some benefit for me to go see a psychologist or a  
10 psychiatrist"?

11 A. I'm like kind of embarrassed to ask them. I'd  
12 rather do it on my own.

13 Q. Isn't the reason that you haven't gone to go  
14 see someone, ma'am, is you don't feel the need to do  
15 that?

16 MR. HOROWITZ: Form.

17 THE WITNESS: No, I do feel the need. I want  
18 to go see somebody, but I just don't feel  
19 comfortable doing it now.

20 BY MR. CRITTON:

21 Q. But why? I mean it doesn't make sense -- let  
22 me strike that.

23 In the year 2010, have you been on any trips?

24 A. Yes.

25 Q. Where did you go?

1 might tell a psychologist -- just a minute, I need to  
2 ask the question, ma'am.

3 What were you concerned with that I might ask  
4 that you might tell a psychologist or psychiatrist that  
5 you wouldn't want he or she to repeat to me?

6 A. Nothing. I just talked to those because I had  
7 to talk to those people, and I'd rather just wait until  
8 everything is over, because I don't feel comfortable  
9 like talking to people right now.

10 And also, like I'm in college. I don't have,  
11 you know, money right now to go see somebody. And I  
12 don't, and my parents aren't going to like -- I mean I'm  
13 not going to pay \$40 a visit every week or two weeks,  
14 whatever. Like I have like \$100 a week I have to live  
15 on in college basically, so --

16 Q. Have you actually gone to the [redacted] center where  
17 they have psychologists and psychiatrists?

18 MR. HOROWITZ: Form.

19 THE WITNESS: I definitely don't want to go to  
20 [redacted] center.

21 BY MR. CRITTON:

22 Q. Why wouldn't you do that? Because your  
23 medical records or your psychiatric records or  
24 behavioral, psychological records are supposed to be  
25 completely privileged.

1 A. I mean I went to Key West.

2 Q. With whom?

3 A. I went with just my friend [redacted].

4 Q. [redacted]?

5 A. Uh huh.

6 Q. Where did you stay?

7 A. We stayed at my friend's ex-boyfriend's place  
8 down in Key West.

9 Q. My friend's ex-boyfriend. Your friend, whose  
10 name is?

11 A. My friend [redacted], my old roommate. Her  
12 ex-boyfriend lives in Key West.

13 Q. His name is?

14 A. Nick.

15 Q. Nick?

16 A. Yes.

17 Q. Was Nick there when you were there?

18 A. Yes.

19 Q. Where does he live in Key West?

20 A. He just lives in a small apartment off Duval  
21 Street.

22 Q. So you stayed with him for what, a week?

23 A. Yeah, for like five days.

24 Q. Four to five days?

25 A. Uh huh.

1 Q. Yes?  
 2 A. Yes.  
 3 Q. Okay. And I assume you partied every night,  
 4 went out every night?  
 5 A. I mean we went out some and we just went to  
 6 the beach a lot.  
 7 Q. Okay. So it's your testimony during the four  
 8 or five nights that you were there -- what time period  
 9 were you there, spring break?  
 10 A. Yes.  
 11 Q. So you were there for spring break, a million  
 12 other college kids there?  
 13 MR. HOROWITZ: Form.  
 14 THE WITNESS: Yes.  
 15 BY MR. CRITTON:  
 16 Q. All right. It would be a fair statement --  
 17 well, let me be accurate. It was during the four or  
 18 five days that you were there, is it your testimony that  
 19 you only went out one or two nights to party and to go  
 20 to clubs?  
 21 MR. HOROWITZ: Form.  
 22 BY MR. CRITTON:  
 23 Q. Or did you go out every night?  
 24 A. I went out a lot when we were there. It was  
 25 spring break.

1 Q. Exactly. My point is that you went down there  
 2 for spring break and you went out every night and you  
 3 partied, didn't you?  
 4 A. Yeah, it's spring break.  
 5 Q. And you had fun?  
 6 A. Yeah, I did.  
 7 Q. And you had a great time?  
 8 A. Yes.  
 9 Q. And you drank alcohol, I assume?  
 10 A. Yes.  
 11 Q. You had a cocktail here and there?  
 12 A. Yes.  
 13 Q. And there were some nights that you had too  
 14 many cocktails?  
 15 A. Yes.  
 16 Q. And how did you get down there? Whose car did  
 17 you drive down from Orlando?  
 18 A. I drove.  
 19 Q. All right. And who paid for your meals when  
 20 you were there?  
 21 A. We did. We went food shopping before we even  
 22 got there and we like -- when we got there, we went food  
 23 shopping and just mainly made food to like save money,  
 24 because food is like expensive down there.  
 25 Q. Who paid for the gas?

1 A. We both split it.  
 2 Q. All right. Who paid for your drinks when you  
 3 went out, when you even had too much to drink?  
 4 MR. HOROWITZ: Form.  
 5 THE WITNESS: I mean we did sometimes.  
 6 BY MR. CRITTON:  
 7 Q. All right. And then if you were lucky, maybe  
 8 some guy would buy you a drink or drinks?  
 9 A. Yes.  
 10 Q. I'm sorry?  
 11 A. Yes.  
 12 Q. All right. And isn't it a true statement,  
 13 Jane Doe 7, is if you really wanted to see a  
 14 psychologist, you have maybe not every week, but you  
 15 would have had the funds to do that, you just choose to  
 16 use your funds in a different, for different purposes at  
 17 the current time?  
 18 MR. HOROWITZ: Form.  
 19 THE WITNESS: No, that's not the main reason.  
 20 The main reason was I wanted to wait until after  
 21 the lawsuit.  
 22 BY MR. CRITTON:  
 23 Q. So people like me who represent Mr. Epstein  
 24 maybe can't look at what you tell a psychologist?  
 25 A. I mean I just feel uncomfortable like saying

1 everything right now.  
 2 Q. What makes you think you will be more  
 3 comfortable after a lawsuit talking with someone?  
 4 A. Just because when everything is like done and  
 5 over with, I feel like it will be a better time to just  
 6 help me get over everything.  
 7 Q. Isn't it true, though, if you really wanted to  
 8 see -- well, let me ask you this.  
 9 After the police came to you, the Palm Beach  
 10 Police Department came and interviewed you back on  
 11 October 4th of 2005 and you had sent Mom into the house,  
 12 when the Palm Beach police left, did Mom say to you  
 13 "What in heaven's name is this about, Jane Doe 7?"  
 14 A. Yeah, she asked me about it.  
 15 Q. And by that time, Dad was home?  
 16 A. Yes.  
 17 Q. All right. And did you, did they both sit  
 18 down and say "Young Lady," or "Jane Doe 7, come on,  
 19 what's the deal here?"  
 20 A. Yes.  
 21 Q. "What happened?" How long did that  
 22 conversation last?  
 23 A. I mean I obviously didn't tell them everything  
 24 that happened. So I mean I don't know, I just told them  
 25 briefly what I told the cops.

1 Q. So you only told them what you had told the  
2 police, that you were at Mr. Epstein's twice, one time  
3 you gave Mr. Epstein a massage, another time you just  
4 took somebody else?

5 A. Yes.

6 Q. That's what you told them?

7 A. Yes.

8 Q. Have you ever told them anything differently?

9 A. No.

10 Q. So as far as your parents know at this point  
11 in time, as far as they know is that you went to  
12 Mr. Epstein's -- let me strike that.

13 As of today's date, your parents only know  
14 what you told them the day that the Palm Beach Police  
15 Department was there interviewing you?

16 MR. HOROWITZ: Form.

17 THE WITNESS: They never asked me about it.  
18 They don't really want to know or care to know  
19 everything. They already don't like Jeffrey. They  
20 read the papers. They know what goes on and went  
21 on. I mean they are not stupid.

22 BY MR. CRITTON:

23 Q. Well, they have no idea what went on with you  
24 and whether your circumstances are similar to or even  
25 close to what someone, some other person's situation

1 MR. HOROWITZ: Form.

2 THE WITNESS: I mean I'm sure they would try  
3 to help me out. It's just like embarrassing to say  
4 that to them and it's just something I would rather  
5 just deal with on my own.

6 BY MR. CRITTON:

7 Q. You sent me some, or your attorney sent me  
8 some additional answers to interrogatories the other  
9 day.

10 MR. CRITTON: Let's go off the record for a  
11 minute.

12 THE VIDEOGRAPHER: Going off the record at  
13 2:41 p.m.

14 (Discussion held off the record.)

15 THE VIDEOGRAPHER: We're back on the record at  
16 2:46 p.m.

17 (The documents were marked Defendant's  
18 Exhibits 1-3 for identification.)

19 BY MR. CRITTON:

20 Q. Before I get back to the interrogatories, you  
21 wouldn't, growing up, from the time that you were  
22 freshman through even your current status, you wouldn't  
23 have considered yourself economically disadvantaged,  
24 would you?

25 A. What does that mean?

1 might be, true?

2 MR. HOROWITZ: Form.

3 THE WITNESS: Yeah, but I -- they don't really  
4 want to know. I mean they, I told them what I told  
5 them and I mean that's all that I mean they know,  
6 and from reading other people's things like what he  
7 did or tried to do to most girls. So --

8 BY MR. CRITTON:

9 Q. Have they ever asked you, has your mother ever  
10 asked you "Hey, Jane Doe 7, what happened when you were  
11 at Mr. Epstein's home?"

12 A. Just the first time that the cop --

13 Q. Since that day, she's never asked and you've  
14 never offered?

15 A. No.

16 Q. Correct?

17 A. Correct.

18 Q. Same thing with Dad?

19 A. Correct.

20 Q. Is it your testimony that if you went to your  
21 parents and you said "Look, I think I might need some --  
22 I'd like to see a psychiatrist or a psychologist to help  
23 me deal with some issues relating to Mr. Epstein,"  
24 assuming you said that to them, it's your testimony that  
25 your parents would say no?

1 Q. I'm not sure. Did you feel economically  
2 deprived when you were a freshman or a sophomore or a  
3 junior or a senior in high school, that your parents had  
4 economically deprived you, or did you feel that you were  
5 fine economically?

6 MR. HOROWITZ: Form.

7 BY MR. CRITTON:

8 Q. I mean everybody would like to have more  
9 money.

10 A. I mean my parents had to work really hard for  
11 their money, so it's not like I had everything given to  
12 me, like my dad made me work for it. If I ever wanted  
13 money, I had to like wash his car or do something, so I  
14 mean --

15 Q. Those are good things, though, you had chores?

16 A. Yeah, but --

17 Q. You didn't consider yourself economically  
18 disadvantaged, did you?

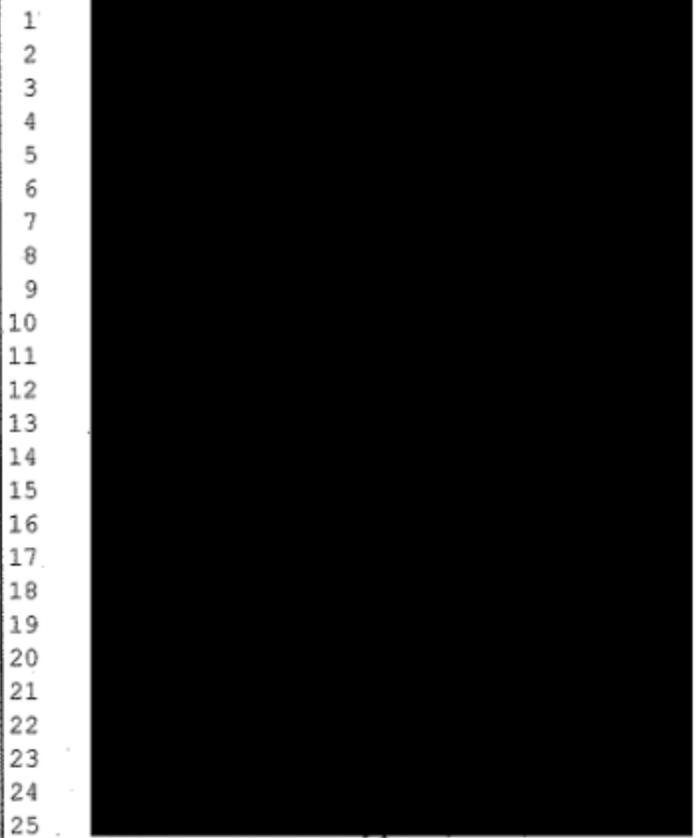
19 MR. HOROWITZ: Form.

20 THE WITNESS: I guess not.

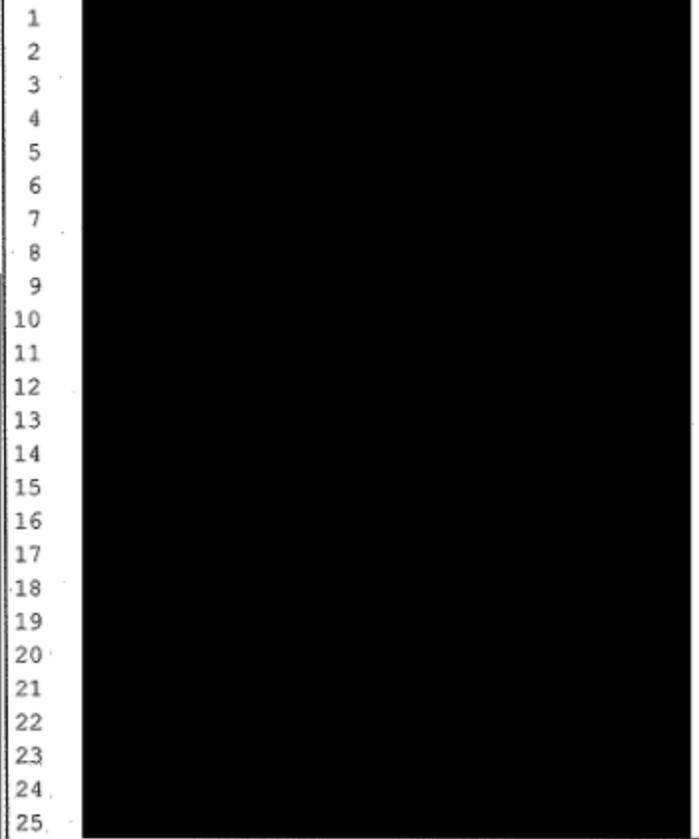
21 BY MR. CRITTON:

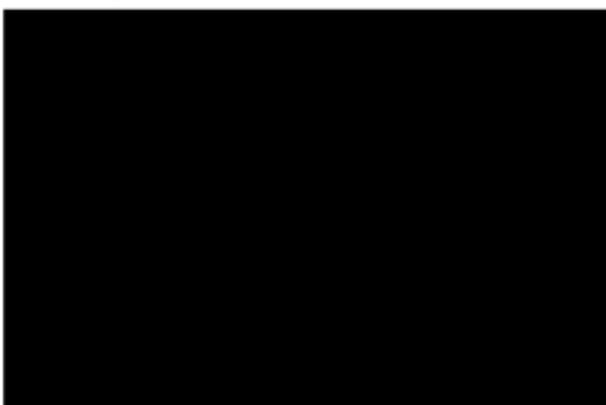
22 Q. Jane Doe 4, I had an opportunity to meet her  
23 parents. I wouldn't describe her as being economically  
24 disadvantaged, but you don't care what I think, so my  
25 question to you is do you think Jane Doe 4's parents or

1 her family life or that she was in any way economically  
 2 disadvantaged?  
 3 MR. HOROWITZ: Form.  
 4 THE WITNESS: I don't think so.  
 5 BY MR. CRITTON:  
 6 Q. How about Jane Doe 3, did she have similar  
 7 middle class circumstances like yourself and Jane Doe 4?  
 8 MR. HOROWITZ: Form.  
 9 THE WITNESS: Yes.  
 10 BY MR. CRITTON:  
 11 Q. Okay. So you wouldn't have considered her  
 12 economically disadvantaged, would you?  
 13 MR. HOROWITZ: Form.  
 14 THE WITNESS: Yes.  
 15 BY MR. CRITTON:  
 16 Q. You would?  
 17 A. No, I wouldn't.  
 18 Q. All right. In your answers to interrogatories  
 19 you listed, which is Exhibit 2, you listed the only  
 20 medical, physicians, medical facilities, health care  
 21 providers -- and I'm paraphrasing -- psychiatrists,  
 22 psychologists, et cetera, that you had seen in the past  
 23 ten years, you listed the walk-in medical center at  
 24 Orlando, at University Boulevard, Orlando, 2005 to the  
 25 present.



1 I assume that's the school clinic?  
 2 A. No. Just a clinic that was by my house.  
 3 Q. Like a doc-in-the-box?  
 4 A. Yeah.  
 5 Q. And if you had a cold or got the flu or  
 6 something, you would go there for medical care and  
 7 treatment?  
 8 A. Yes.





BY MR. CRITTON:

Q. Okay. Tell me about at the current time, I know you have told us other than seeing Dr. Kliman, you have never seen a psychiatrist, psychologist, mental health counselor for any reasons relating to damages you claim for which you seek money damages against Mr.-- let me start that again.

You filed a lawsuit seeking money damages from Mr. Epstein for money, right?

MR. HOROWITZ: Form.

THE WITNESS: Yes.

BY MR. CRITTON:

Q. Okay. And what do you think your damages are?

wasn't thinking.

And it's just something I wish I could take back, something that happened to me. And it's something I'll never be able to forget for the rest of my life, and just the pain that I caused my parents and other people. It's just --

Q. What pain have you caused -- what other person have you caused pain?

A. I mean mainly my parents like more than anything. It was heartbreaking for me when they found out. And I mean I wish I could take it back, and --

Q. What did your parents say to you when you told them that you had been to Mr. Epstein's twice?

A. I mean they were just asking me why, why would you do that? Like how -- I mean they understand now that, you know, it was, he was just a predator mainly, but, you know, at the time they just, they were upset.

Q. Okay. I don't want to -- let me ask my question again.

MR. CRITTON: Okay, let me see it again. Run it down for me, Rachel.

BY MR. CRITTON:

Q. What specifically, when you told your parents you had been to Mr. Epstein's twice, once with [REDACTED] and you had given him a massage, he meaning Mr. Epstein, did

That is, what elements or items of damage do you think you have sustained as a result of your having been to Mr. Epstein's home?

MR. HOROWITZ: Form.

BY MR. CRITTON:

Q. In your words.

A. Well, for like the last six years I've been like, I've had a lot of things happen to me. I've been depressed a lot. I have anxiety. I just feel like that happened and I can, something I could never take back. I feel like I'm damaged, you know, and it's just like I feel like dirty almost for doing that and I'm really like self-conscious about it.

I mean I have like flashbacks a lot of going, and then I get really depressed. Every time I hear his name or something come up about it, I get depressed where I don't eat and I can't sleep. I just have really bad anxiety. Just my memory a lot too. I mean I have memory problems.

I tried to like hide all the memories, just to try to get over everything. And I mean it's just hard. Like when people bring it up and I have to talk about it, it's embarrassing. It's hard. It just makes me feel like just I did something and it's -- I know now, you know, that it's not my fault, but at the time I just

you tell them that he never touched you, that you never touched him, that nothing occurred other than you gave him a massage, just like you told the police?

MR. HOROWITZ: Form.

THE WITNESS: I told them that he tried, you know, to touch me and do things with me, but obviously I couldn't tell my parents everything. I mean they know now, you know, what's, what went on there and, you know, just from assuming and hearing from other people and reading things.

BY MR. CRITTON:

Q. Okay. Let me move to strike as nonresponsive.

I don't want to know what they assumed, okay? I'm not interested in that. I'm interested in what you told them.

So if you listen to my question, you keep adding on, but I'm assuming and they read this and they read that. I'm not -- I'm glad they have read, or it's up to them what they want to read or not. I just want to know what they have told you and what you have said to them, okay? So focus on my question if you would, ma'am.

You told me earlier, a couple of times, that you told them the day that the Palm Beach police were there at your house the same thing that you had said to

1 the police, correct?  
 2 A. Yes.  
 3 Q. Okay. And what you would have said to them  
 4 was, is that you gave him a massage on one occasion, he  
 5 never touched you, and you never touched any of his  
 6 private parts, right?  
 7 MR. HOROWITZ: Form.  
 8 BY MR. CRITTON:  
 9 Q. You told him that?  
 10 A. Yes.  
 11 Q. And you told them the second time you went,  
 12 you took somebody else, you may have gone with Jane  
 13 Doe 4, you may have gone with [REDACTED], but you didn't go  
 14 upstairs, correct?  
 15 A. Yes.  
 16 Q. Okay. So at least as of that date, as of the  
 17 date that you spoke with them, which you have testified  
 18 as well today is the only time you have ever talked to  
 19 them about what occurred at Mr. Epstein's house, as far  
 20 as they know, you gave Mr. Epstein a massage on one  
 21 occasion, you were fully clothed and he was completely  
 22 covered, true?  
 23 MR. HOROWITZ: Form.  
 24 THE WITNESS: I mean at that point, that's  
 25 what I told them, yes.

1 BY MR. CRITTON:  
 2 Q. At the current time?  
 3 MR. HOROWITZ: Form.  
 4 THE WITNESS: A lot, especially lately, me  
 5 having to go through all this.  
 6 BY MR. CRITTON:  
 7 Q. You mean having to do this deposition?  
 8 A. I mean this whole -- I mean it depends. I  
 9 mean sometimes it's worse than others. Like when they  
 10 bring up his name or, you know, my mom will call me  
 11 saying she read something in the newspaper, I won't be  
 12 able to eat for like a week. I'll get depressed. I'll  
 13 have bad anxiety. It's hard for me to like do  
 14 schoolwork. It will bring like flashbacks back.  
 15 Just every day I feel like disgusting, and  
 16 every time I hear his name, it just brings back  
 17 memories.  
 18 Q. This is an everyday thing for you?  
 19 MR. HOROWITZ: Form.  
 20 THE WITNESS: Not every day, I mean some  
 21 days --  
 22 BY MR. CRITTON:  
 23 Q. You --  
 24 MR. HOROWITZ: She wasn't done, I don't think.  
 25 MR. CRITTON: She keeps changing anyway. It

1 BY MR. CRITTON:  
 2 Q. Right. And they may have read things in the  
 3 newspaper, but you have never told them anything  
 4 different than what you told them that one occasion back  
 5 on October 4th of 2005, correct?  
 6 MR. HOROWITZ: Form.  
 7 THE WITNESS: Yes. I mean I also told the  
 8 cops that he did try to grab me in my butt and I  
 9 believe I told my parents that too.  
 10 BY MR. CRITTON:  
 11 Q. Okay. So you told them that too. And that's,  
 12 as far as they know, that's all that occurred, true?  
 13 A. Yes.  
 14 MR. HOROWITZ: Form.  
 15 BY MR. CRITTON:  
 16 Q. Okay. Now, you gave a list of issues that you  
 17 have, including depressed, anxiety, you feel damaged or  
 18 dirty, self-conscious. You don't eat, sleep, things of  
 19 that nature.  
 20 How often do any of those symptoms or those  
 21 issues bother you?  
 22 MR. HOROWITZ: Form.  
 23 BY MR. CRITTON:  
 24 Q. Or cause you any concern?  
 25 MR. HOROWITZ: Form.

1 doesn't make any difference.  
 2 MR. HOROWITZ: Move to strike.  
 3 BY MR. CRITTON:  
 4 Q. Are you done? Are you going to add more to  
 5 it?  
 6 A. What else were you going to ask me?  
 7 Q. Your lawyer thought you had more to say, so  
 8 I'm going to give you the chance.  
 9 I'm trying to find out how often this bothers  
 10 you. Say over the last six months or a year, how often  
 11 do any of those symptoms seem to bother you?  
 12 A. I mean every week.  
 13 Q. Every --  
 14 A. Basically. I mean I try do other things to  
 15 like -- you know, I mean I try to go out with my friends  
 16 and hang out and just to kind of get it off my mind, but  
 17 I mean something always comes back to remind me or bring  
 18 it up, or I'll hear something and I just fall into like  
 19 depression again.  
 20 Q. Okay. So has this been true since the day  
 21 that the Palm Beach police came to your home on  
 22 October 4th of 2005?  
 23 MR. HOROWITZ: Form.  
 24 THE WITNESS: Yes.  
 25

1 BY MR. CRITTON:  
 2 Q. Is that when it started, when all of a sudden  
 3 you knew that someone else might know?  
 4 MR. HOROWITZ: Form.  
 5 THE WITNESS: It started before then, like  
 6 even when I was going like I would be depressed and  
 7 I would just, like I don't know why I kept going.  
 8 I was confused, but I mean I just felt dirty kind  
 9 of and I was upset then. So I mean it's been going  
 10 on for a while, not just after the police.  
 11 BY MR. CRITTON:  
 12 Q. So now it's your testimony that from the first  
 13 time you went to Mr. Epstein's home, you were depressed?  
 14 MR. HOROWITZ: Form.  
 15 THE WITNESS: Not the first time.  
 16 BY MR. CRITTON:  
 17 Q. How about the second time?  
 18 MR. HOROWITZ: Form.  
 19 THE WITNESS: I mean if you're really going to  
 20 start doing that to me, I mean it's --  
 21 BY MR. CRITTON:  
 22 Q. It's not doing it to you, ma'am. I need to  
 23 know. You are claiming \$50 million against Mr. Epstein  
 24 in this case, so I need to know when --  
 25 A. Well, you are like belittling everything I am

1 MR. HOROWITZ: Form.  
 2 THE WITNESS: The first time I really became  
 3 depressed was like after the last time I went when  
 4 he really tried to, you know, do stuff with me  
 5 forcefully, and then I just felt disgusting and I  
 6 got depressed, and that's why I just stopped going.  
 7 BY MR. CRITTON:  
 8 Q. Okay. And time frame again you are not sure,  
 9 it might have been in '04, it might have been in '05,  
 10 you are just not sure, correct?  
 11 MR. HOROWITZ: Form.  
 12 BY MR. CRITTON:  
 13 Q. When the last time you went to Mr. Epstein's?  
 14 A. I can't remember the exact date.  
 15 Q. Sometime in 2004, 2005?  
 16 A. Yes.  
 17 Q. All right. And prior to the last time you  
 18 were there, you had never been depressed when you had  
 19 been at Mr. Epstein's home; is that correct?  
 20 MR. HOROWITZ: Form.  
 21 THE WITNESS: I mean I was upset. I  
 22 wouldn't -- I don't, I can't -- I don't know, I  
 23 can't prescribe myself. I'm not a psychologist, I  
 24 don't --  
 25

1 saying.  
 2 Q. I'm not belittling it, okay? I'm not at all.  
 3 MR. HOROWITZ: I think you are, Bob. You are  
 4 snickering.  
 5 MR. CRITTON: I am not snickering at all, all  
 6 right?  
 7 MR. HOROWITZ: You did several times.  
 8 MR. CRITTON: I did not.  
 9 MR. HOROWITZ: You have rolled your eyes  
 10 several times.  
 11 MR. CRITTON: Well, there's a lot of things  
 12 that you've rolled your eyes at and I don't call  
 13 you on it, and with the changes of testimony this  
 14 lady has, it's a wonder my eyes can stay normal  
 15 anyway with the level -- anyway, be that as it may,  
 16 you can object to form all you want.  
 17 BY MR. CRITTON:  
 18 Q. So let me clear it up with you, ma'am. I'm  
 19 interested in what your damages are in this case. Do  
 20 you understand that?  
 21 A. Yes.  
 22 Q. Okay. So have you been depressed since the  
 23 first time you went to Mr. Epstein's home? And if not,  
 24 tell me when you first became depressed as a result of  
 25 having met Mr. Epstein.

1 BY MR. CRITTON:  
 2 Q. Well, were you ever anxious when you left  
 3 Mr. Epstein's house?  
 4 A. Yeah, every time I left his house, I just  
 5 thought what did I just do? And I don't know why I kept  
 6 going.  
 7 THE VIDEOGRAPHER: Five minutes till tape  
 8 change.  
 9 BY MR. CRITTON:  
 10 Q. Even though you were anxious, you knew what  
 11 was going on at least from your own words earlier was  
 12 inappropriate, you continued to go back to  
 13 Mr. Epstein's; true?  
 14 MR. HOROWITZ: Form.  
 15 THE WITNESS: Yes.  
 16 BY MR. CRITTON:  
 17 Q. And you chose voluntarily to get in your car  
 18 and go back to Mr. Epstein's; true?  
 19 A. Yes.  
 20 Q. All right. Did you feel self-conscious?  
 21 A. I mean of course I did.  
 22 Q. After the first time you went to Mr. Epstein's  
 23 home?  
 24 A. I mean yeah. I just, I felt like somebody is  
 25 going to find out or I mean I was just, the whole time I

1 was just, I just felt disgusting for going there.  
 2 Q. All right. And at that time did you have,  
 3 during the time you were going to Mr. Epstein's, did you  
 4 have flashbacks?  
 5 A. No, they started after.  
 6 Q. When?  
 7 A. After I stopped going there.  
 8 Q. The day after the last time you were there,  
 9 did they start?  
 10 A. No. It's like when my friends would say, you  
 11 know, they went to Jeffrey's or something, then I would  
 12 get flashbacks.  
 13 Q. Which of your friends did you tell after the  
 14 last time you went to Mr. Epstein's that you were either  
 15 depressed, you were anxious, you felt disgusting,  
 16 self-conscious, or that you were having flashbacks?  
 17 MR. HOROWITZ: Form.  
 18 BY MR. CRITTON:  
 19 Q. Which of the friends did you tell?  
 20 A. I believe just Jane Doe 4.  
 21 Q. Okay. And you told Jane Doe 4 that you were  
 22 having all these symptoms, right?  
 23 A. I mean no.  
 24 MR. HOROWITZ: Form.  
 25 THE WITNESS: I don't exactly remember what I

1 told her. I just remember telling her I was upset  
 2 about it.  
 3 BY MR. CRITTON:  
 4 Q. But you knew she was still going?  
 5 A. Yes.  
 6 Q. Okay. Did you say "Jane Doe 4, I feel  
 7 depressed, anxious, disgusting, self-conscious, I'm  
 8 having flashbacks, I'm not eating and sleeping, I'm  
 9 having memory problems. Why in heaven's name would you  
 10 continue to go see Mr. Epstein?"  
 11 Did you have that conversation with your very  
 12 best friend?  
 13 MR. HOROWITZ: Form.  
 14 THE WITNESS: No.  
 15 BY MR. CRITTON:  
 16 Q. What have these symptoms that you've expressed  
 17 of depression, anxiety, feeling disgusting,  
 18 self-conscious, flashbacks, have those symptoms been  
 19 pretty much the same since you last went to  
 20 Mr. Epstein's up through the current time?  
 21 MR. HOROWITZ: Form.  
 22 THE WITNESS: I mean right around when I  
 23 stopped going, they were really bad. And then, you  
 24 know, it just kind of, you know, I tried to forget  
 25 about it up until, you know, when I got contacted

1 by the FBI and then just everything came back. And  
 2 that's when it started getting really bad and I was  
 3 really upset then.  
 4 And, you know, just having to talk to the FBI,  
 5 and I mean that was like depressing and scary and  
 6 like I just had really bad anxiety and I felt like  
 7 I was having panic attacks.  
 8 And I mean, so I mean it kind of started back  
 9 up.  
 10 BY MR. CRITTON:  
 11 Q. Okay. So sometimes it's more, sometimes it's  
 12 less?  
 13 A. Yes.  
 14 Q. And is it because again someone brought it to  
 15 your attention or wants to talk about it that that  
 16 causes you anxiety?  
 17 MR. HOROWITZ: Form.  
 18 THE WITNESS: I mean of course some people  
 19 like bring it up and I hear about it, I get, you  
 20 know, anxiety and it just brings back everything.  
 21 BY MR. CRITTON:  
 22 Q. Do you think this lawsuit creates anxiety for  
 23 you?  
 24 A. I mean of course.  
 25 Q. All right. And you think when this lawsuit is

1 over, a lot of the anxiety that you have and the  
 2 feelings that you have will go away?  
 3 MR. HOROWITZ: Form.  
 4 THE WITNESS: I'm hoping after it's over, I  
 5 can just kind of get help and get past everything.  
 6 BY MR. CRITTON:  
 7 Q. And whether you recover a dollar from  
 8 Mr. Epstein or \$100,000, do you think that your ability  
 9 to get better will be the same?  
 10 MR. HOROWITZ: Form.  
 11 THE WITNESS: I don't think there is any  
 12 amount of money that could ever, you know -- I mean  
 13 I would much rather have never had this happen to  
 14 me than have any amount of money. There is  
 15 nothing, amount of money that somebody could give  
 16 me to help me get through everything, but I mean  
 17 I'm just hoping that when everything is over, you  
 18 know, I can just try to see somebody to help me and  
 19 try to forget about it and move on with my life.  
 20 MR. CRITTON: Need to change tape.  
 21 THE VIDEOGRAPHER: Going off the record at  
 22 3:07 p.m. This marks the end of tape two.  
 23 (Discussion held off the record.)  
 24 THE VIDEOGRAPHER: We're back on the record at  
 25 3:09 p.m. This marks the beginning of tape three.

1 BY MR. CRITTON:

2 Q. Jane Doe 7, do you believe that you've lost  
3 any money; that is, have you lost any wages, jobs as a  
4 result of your having been to Mr. Epstein's home?

5 MR. HOROWITZ: Form.

6 THE WITNESS: No.

7 BY MR. CRITTON:

8 Q. Okay. Do you believe you have lost the  
9 ability to earn money in the future as a result of  
10 having been to Mr. Epstein's home?

11 MR. HOROWITZ: Form.

12 THE WITNESS: I do believe I could have got a  
13 lot better grades if I wasn't going through this  
14 all of college.

15 BY MR. CRITTON:

16 Q. Well, in high school it looks like you, and  
17 particularly your senior year after you alleged in part  
18 that you stopped seeing Mr. Epstein, you got almost all  
19 A's and a few B's; did you not?

20 A. Yes.

21 Q. Okay. And it appears in looking at least to  
22 your junior and sophomore years is your grades after you  
23 stopped seeing Mr. Epstein, at least you say you stopped  
24 seeing Mr. Epstein improved substantially; is that true?

25 MR. HOROWITZ: Form.

1 THE WITNESS: The only reason why I got all  
2 A's is because I had OJT.

3 BY MR. CRITTON:

4 Q. What's OJT?

5 A. On-the-job training where they let you out of  
6 school earlier for three hours.

7 Q. Well, in looking at your transcript from  
8 twelfth grade, it looks like you took English 3 -- I'm  
9 sorry, English 4, you got a B. That's not OJT, is it?

10 A. No.

11 Q. American economics, that's not OJT, is it?  
12 You got a B in that?

13 A. Uh huh.

14 Q. Correct?

15 A. Yes.

16 Q. TV production, you got an A in that?

17 A. Yes.

18 Q. And then you had Work Experience 2, and three  
19 other OJTs that you all got A's in, correct?

20 A. Yes.

21 Q. And you took -- you did get one [redacted] in American  
22 Political Systems, I see that, but all of your work  
23 experience and OJTs you got A's in, correct?

24 A. Yes.

25 Q. And OJT is where you learn, you are out

1 working?

2 A. Yes, I worked for my dad and my dad's friend  
3 in the [redacted] business.

4 Q. Okay. But it was real life experience?

5 A. Pretty much.

6 Q. All right. And what kind of grades did you  
7 get at [redacted]?

8 A. I just got average grades, I think.

9 Q. B's, A's and B's?

10 A. Yeah, like B's.

11 Q. What was your grade point from [redacted]?

12 A. I don't remember. I think it was -- I don't  
13 know.

14 Q. How about since you've been at [redacted] what's  
15 your grade point there?

16 A. I think it's around like a 2.8 or 2.9.

17 Q. So it's like a B minus?

18 A. Yeah.

19 Q. 3.0 is a B, so you are almost at a B?

20 A. Yes.

21 Q. And would you describe yourself -- if someone  
22 described you as a party animal; would that be accurate?

23 A. No.

24 Q. So you rarely go out to clubs, to bars?

25 A. I mean I go out, of course, I'm in college,

1 but I'm not a party animal. I still get my schoolwork  
2 done and do all my responsibilities that I have to do.

3 Q. Okay. Just because you are a party animal  
4 doesn't necessarily mean you don't do your work.

5 Let me ask it more this way. You go out with  
6 your friends two to three, four times a week, might go  
7 to a club, to a bar or something like that and hang out?

8 A. Yes.

9 Q. Usually go out every weekend?

10 A. I mean yeah, sometimes.

11 Q. Has that been true both since you have been at  
12 [redacted] and since you have been at [redacted]?

13 A. Yes.

14 Q. This spring break you went to Key West. Where  
15 did you go last spring break?

16 A. Key West.

17 Q. Did you stay at Nick's house again?

18 A. No.

19 Q. Where did you stay at that time?

20 A. Four or five of us split a hotel there.

21 Q. Very common for college kids to go down and  
22 stay a week and split a room and put a bunch of people  
23 in? Yes?

24 A. Yes.

25 Q. You partied every night when you were down

1 there just like all the other college kids do?

2 A. Yes.

3 Q. Did you ever feel so depressed or anxious or

4 self-conscious or one of the times that you were not

5 eating or sleeping during spring break?

6 A. I was actually happy to get away from Orlando

7 and get away from everything, so that was kind of like

8 me getting way from everything was going on spring break

9 or taking trips. It was like me getting away from

10 everything.

11 Q. My question to you was did your depression,

12 anxiety, self-consciousness, feeling disgusting, having

13 flashbacks and not being able to eat and sleep, memory

14 problems, did any of those symptoms cause you not to go

15 on a spring break since you've been in college?

16 MR. HOROWITZ: Form.

17 THE WITNESS: No, that was why I went on

18 spring break was to get away from everything.

19 BY MR. CRITTON:

20 Q. Okay. And in the summer you are going to

21 Italy for a month.

22 A. Yes.

23 Q. Is that another escape so you can get away

24 from things?

25 A. No, it's just something I always wanted to do

1 is study abroad.

2 Q. And how about separate and apart from last

3 summer, you stayed up in Orlando. Were you still in

4 school, or this past summer, 2009, did you stay in

5 school?

6 A. Yes.

7 Q. Okay. And did you work during that time

8 period?

9 A. Last summer, I think I worked at Cheyenne's.

10 Q. Cheyenne's is like a bar, saloon?

11 A. Like a restaurant.

12 Q. Restaurant. And what do you do there?

13 A. I was just waitressing.

14 Q. How long have you worked there?

15 A. I worked there for about a year.

16 Q. You make like a minimum wage plus tips?

17 A. Yes.

18 Q. And in addition to doing your waitressing,

19 were you also in college; that is, were you taking some

20 courses?

21 A. Yes.

22 Q. All right. And as well, would you go out

23 with -- this last year, Jane Doe 4 is with you in '08,

24 so this last year you would go out with your friends or

25 stay out late when you finished your shifts?

1 A. No. I mean I would have to stay late. My

2 reason for working there, it was an internship.

3 Q. But you got paid too?

4 A. Yes, I got paid, but I had to work in a

5 hospitality establishment for my internship and I had to

6 do three internships, so that was my reason for working.

7 Q. What did you -- I'm sorry, what do you plan to

8 do when you finish?

9 A. I honestly have no idea, but hopefully get a

10 job.

11 Q. You have both [REDACTED] and [REDACTED] now as

12 a minor.

13 A. Uh huh.

14 Q. Have you started looking for a job at all?

15 A. No, not now.

16 Q. Have you tried to do any internships through

17 school where you could ultimately move into, like

18 Cheyenne, is it a chain or is it just a sole building?

19 A. It's actually closed down now.

20 Q. All right. Have you talked to any other

21 restaurant chains or any other hotels or hospitality

22 type situations to see if you could get an internship so

23 you could get into the program and work your way up?

24 A. No, because I'm leaving for Italy, so I --

25 there is no point in me starting to work somewhere now.

1 I want to wait until I get back.

2 Q. So when you get back from Italy, you will have

3 to then start looking for a job?

4 A. Yes.

5 Q. Do you plan to return to Orlando or do you

6 plan to return home?

7 A. I don't know yet.

8 Q. What have your parents said, or I guess you

9 are an adult, so you can decide what you want to do,

10 right?

11 A. Yes.

12 Q. But you have made no plans?

13 A. No, not yet.

14 Q. Is there anything, is there any activity that

15 you haven't done as a result of what you claim are

16 injuries or damages you sustained from being at

17 Mr. Epstein's home? Is there anything you haven't done?

18 A. I don't really know.

19 Q. You can't think of anything?

20 MR. HOROWITZ: Form.

21 THE WITNESS: I mean I don't know.

22 BY MR. CRITTON:

23 Q. All right. As you're sitting here, you can't

24 think of any activity or any trip or any school that you

25 have not done or a course that you haven't taken as a

1 result of having been at Mr. Epstein's home; is that  
2 correct?

3 MR. HOROWITZ: Form.

4 THE WITNESS: Yes.

5 BY MR. CRITTON:

6 Q. Let me show you exhibit -- are we on  
7 Exhibit 4?

8 (The document was marked Defendant's  
9 Exhibit 4 for identification.)

10 BY MR. CRITTON:

11 Q. All right, let me show you Exhibit 4. Can  
12 you --

13 A. I see you guys have access to my MySpace and  
14 Facebook.

15 Q. My question is do you recognize that photo?

16 A. Yes, I do.

17 Q. And who is that depicted in the photo?

18 A. That's [REDACTED].

19 Q. And?

20 A. And me.

21 Q. All right. And where were you at the time?

22 A. We were -- it was Halloween. We were  
23 somewhere for Halloween.

24 Q. All right. So is it, Halloween is usually, I  
25 think it's October 30th?

1 MR. HOROWITZ: I didn't raise my eyes. I said  
2 she was responding to your question.

3 You wanted her to say that she could still  
4 have a good time --

5 MR. CRITTON: Let Rachel read the question  
6 back. Don't use up my time.

7 (A portion of the record was read by the  
8 reporter.)

9 BY MR. CRITTON:

10 Q. Let me repeat the question so it's clear.

11 Exhibit 4 depicts you and [REDACTED] out at  
12 Halloween in costumes drinking 27 days after the police  
13 interviewed you, and you told your parents for the first  
14 time what, at least a truncated version of what occurred  
15 at Mr. Epstein's house, right?

16 A. Yes.

17 Q. And you were able, certainly not just  
18 Halloween, but before that, after that you continued to  
19 party and go to parties, correct?

20 A. I told you I used that, like me going to  
21 parties has nothing to do with my anxiety and all of  
22 that.

23 It's me trying to get, just trying to get over  
24 everything and hang out with my friends and forget about  
25 everything that was going on.

1 MR. HOROWITZ: Every year.

2 BY MR. CRITTON:

3 Q. Every year, or 31st, whatever it is. Probably  
4 the 31st. So that would have been October 31st. That  
5 would have been approximately 27 days after the police  
6 took your, or interviewed you in the beginning of  
7 October of 2005; is that correct?

8 A. Yes.

9 Q. So you were still able to go out, go to  
10 parties, do those kinds of things even after the police  
11 interviewed you?

12 A. A lot of times I use drinking as like a way to  
13 help me forget about what happened and forget about, you  
14 know, the stress I was under because of it and about the  
15 whole thing.

16 MR. CRITTON: Okay. I'm going to move to  
17 strike as nonresponsive. So let me have Rachel  
18 read the question back to you and see if you can  
19 answer my question.

20 MR. HOROWITZ: That was responsive.

21 MR. CRITTON: Yeah, right.

22 MR. HOROWITZ: It's not the response you  
23 wanted, but it's responsive.

24 MR. CRITTON: Stop rolling your eyes or  
25 raising your eyebrows in support of your position.

1 Q. Before you ever went to Mr. Epstein's house,  
2 you hung out with your friends, right?

3 A. Yes.

4 Q. Before you ever went to Mr. Epstein's house,  
5 while you may not have taken drugs, you did drink  
6 alcohol, didn't you?

7 A. Not really.

8 Q. So if people say before you ever went to  
9 Mr. Epstein's you never had alcohol or you had  
10 alcohol -- I've got to start again.

11 Is it your testimony that you never drank  
12 alcohol before you went to Mr. Epstein's?

13 A. I don't remember if I ever drank or not, but  
14 it definitely wasn't like I do now. Like I wasn't  
15 partying. I might have had a beer or two beers, but I  
16 don't really remember.

17 I remember starting to drink around my junior  
18 year of college.

19 Q. Okay.

20 A. I mean, sorry, high school.

21 Q. And is it now your testimony that you are  
22 relating your drinking because you went to  
23 Mr. Epstein's?

24 A. I'm not relating. It just helps me cope with  
25 everything and forget about it.

1 Q. College kids are notorious for drinking,  
2 right? I mean kids drink in college?

3 MR. HOROWITZ: Form.

4 THE WITNESS: Yes.

5 BY MR. CRITTON:

6 Q. All right. And you drink and you drink to  
7 excess from time to time, just like other college kids  
8 do?

9 A. Yes.

10 Q. Okay, because your college experience is very  
11 similar to what other college kids' experience is, from  
12 what you've observed, true?

13 A. I don't think it's half as similar as what  
14 other college kids had to go through. And if they had  
15 to go through this, I'm sure they would drink too in  
16 excess.

17 MR. CRITTON: I'll move to strike as  
18 nonresponsive.

19 BY MR. CRITTON:

20 Q. My question to you is other college kids go  
21 out and party two, three, four times a week; that's not  
22 unusual, is it?

23 A. I mean some do, some don't.

24 Q. All right. And you are with a crowd that does  
25 and you like to do that, don't you?

1 MR. HOROWITZ: Form.

2 THE WITNESS: I mean I like to hang out with  
3 my friends and drink.

4 BY MR. CRITTON:

5 Q. All right. And you have described what your  
6 symptoms are after the last time you saw Mr. Epstein as  
7 being -- let's see what you described it -- as  
8 depressed, anxious, felt disgusting, self-conscious,  
9 flashbacks, can't eat and sleep.

10 Let me show you Exhibit 5.

11 MR. HOROWITZ: I'm going to object to these  
12 exhibits, particularly under rule 26. You guys got  
13 to turn this stuff over. You can't just come to a  
14 deposition with these things. And you haven't  
15 produced them.

16 (The document was marked Defendant's  
17 Exhibit 5 for identification.)

18 MR. CRITTON: Here.

19 MR. HOROWITZ: Take a look at this.

20 BY MR. CRITTON:

21 Q. Do you recognize this as being part of your  
22 Facebook space from the 2005 time period?

23 MR. HOROWITZ: Form.

24 THE WITNESS: No. It's part of my MySpace.  
25

1 BY MR. CRITTON:

2 Q. What did I say?

3 A. Facebook.

4 Q. Facebook, okay, MySpace. Do you still have a  
5 MySpace account?

6 A. I do.

7 Q. Do you have a Facebook as well?

8 A. I'm sure you guys know. Yes, I do.

9 Q. I get to ask questions. I don't even know  
10 what I know sometimes. You still use Facebook?

11 A. Yes.

12 Q. And is it still -- what's your -- what's the  
13 word that you key into if someone wanted to look at your  
14 MySpace? They would look at what? What would they have  
15 to print in?

16 MR. HOROWITZ: Form.

17 THE WITNESS: What do you mean?

18 BY MR. CRITTON:

19 Q. What do you use as like your call -- I should  
20 know this, as your location. There is a word for that  
21 and I can't -- it says Jane Doe 7 on it, but what would  
22 I type in to come to your MySpace page?

23 MR. HOROWITZ: Are you asking her for a  
24 password? I don't think she has to give you that.

25 MR. CRITTON: No, I'm not asking for a

1 password, but just to get on your Facebook.

2 THE WITNESS: You have to friend request me.

3 BY MR. CRITTON:

4 Q. I'm sorry?

5 A. You have to friend request me.

6 Q. If I just typed in Jane Doe 7, would your name  
7 come up under MySpace?

8 A. Yes.

9 Q. Same thing with Facebook?

10 A. Yes.

11 Q. And then you would decide whether you want me  
12 to be your friend?

13 A. Yes.

14 Q. And I would be pretty confident that if I  
15 wrote to you, you would say no, right?

16 A. Probably, yes.

17 Q. All right, good. Let's stick with Exhibit 5.

18 This is your Facebook?

19 A. My MySpace.

20 Q. I'm sorry, MySpace. It has Jane Doe 7's  
21 blurbs, which means that you would have created that  
22 yourself, right?

23 A. Yes.

24 Q. Could you read for the ladies and gentlemen of  
25 the jury what you have under your blurb?



1 left side?  
 2 A. Yes.  
 3 Q. And in fact, this one says last login,  
 4 7/14/2006.  
 5 Does that mean that's the date, that is the  
 6 last time you would have logged in to this?  
 7 MR. HOROWITZ: Form.  
 8 THE WITNESS: At that time.  
 9 BY MR. CRITTON:  
 10 Q. All right. It says "Jane Doe 7's interests.  
 11 If you go to page two, it has Jane Doe 7's interests.  
 12 This is now, this is you on July 14 of '06  
 13 that you would have been in, this would have been the  
 14 end of your first year at [REDACTED]?  
 15 A. (Witness nods head up and down.)  
 16 Q. Correct?  
 17 A. Yes.  
 18 Q. Did you stay up in Orlando during that time  
 19 period?  
 20 A. Yes.  
 21 Q. All right. What does it say Jane Doe 7's  
 22 interests are, general? Could you read that to the  
 23 ladies and gentlemen of the jury?  
 24 A. "I love anything on the water and getting a  
 25 tan. I rode horses since I was like four and still love

1 A. Yes.  
 2 Q. All right. And then hanging out in the lofts  
 3 pool. Lofts is where you were living at the time?  
 4 A. Yes.  
 5 Q. The guy, do you know him?  
 6 A. Yeah, he's a friend of mine.  
 7 Q. Boyfriend or just a guy friend?  
 8 A. Just a friend.  
 9 Q. It says "Getting some sun in South Beach."  
 10 The picture on the right, who is that?  
 11 A. Me and [REDACTED]  
 12 Q. [REDACTED]?  
 13 A. Yes.  
 14 Q. Is that when you had met Mario?  
 15 A. Yes.  
 16 Q. All right. Pictures on page three, and again,  
 17 let me, if I go back to page two where it gives a little  
 18 history of yourself, again, [REDACTED],"  
 19 again, that's what you put on Facebook, correct?  
 20 A. MySpace.  
 21 Q. I'm sorry, MySpace. All right, and then the  
 22 pictures on page four, those again were ones that you  
 23 chose, true?  
 24 A. Yes.  
 25 MR. HOROWITZ: Bob, how is it that you didn't

1 it. I also like relaxing girls' nights out, surfing,  
 2 the beach, goofing off, partying, being in love, coming  
 3 up with funny drunken sayings. I'm not going to lie. I  
 4 like to watch football. I'm a huge Steeler fan and I  
 5 like baseball. Watching the Steelers isn't too bad  
 6 either."  
 7 Q. Are you pretty active even today on Facebook  
 8 and MySpace?  
 9 A. Just Facebook. I don't use MySpace anymore  
 10 really.  
 11 Q. All right. Over on, the bottom picture on  
 12 page two, who is in that picture?  
 13 MR. HOROWITZ: Form.  
 14 BY MR. CRITTON:  
 15 Q. Can you tell?  
 16 A. Right here?  
 17 Q. Pardon?  
 18 A. Right here?  
 19 Q. No, the lower picture, it has three females.  
 20 A. Me and Jane Doe 4 and [REDACTED].  
 21 Q. Jane Doe 4 and [REDACTED]?  
 22 A. Yes.  
 23 Q. All right. Go over to page three. It has  
 24 pictures again. It has "A dangerous combo." Is that  
 25 you in the truck?

1 produce these things? I'm having a hard time, I'm  
 2 still sort of wrestling with this.  
 3 MR. CRITTON: If you want to file a motion,  
 4 that's fine, and I'll explain to the judge.  
 5 MR. HOROWITZ: I want her not to answer any  
 6 questions about this stuff.  
 7 MR. CRITTON: I think this is all impeachment  
 8 information anyway.  
 9 MR. HOROWITZ: I don't care, you have to  
 10 produce it.  
 11 MR. CRITTON: No, I don't.  
 12 MR. HOROWITZ: Yes, you do.  
 13 MR. CRITTON: We will respectfully disagree.  
 14 BY MR. CRITTON:  
 15 Q. If you turn to page 11.  
 16 THE WITNESS: Do I have to answer this?  
 17 MR. HOROWITZ: I don't know what the question  
 18 is, but I might tell you not to.  
 19 BY MR. CRITTON:  
 20 Q. On page 11 it has a Jane Doe 4 and it looks  
 21 like the two of you were, or two faces are hanging there  
 22 with their tongues out. Who is that?  
 23 MR. HOROWITZ: Is that impeachment?  
 24 Don't answer it. You guys aren't playing  
 25 under the rules. You are not producing stuff that

1 you have to. Don't answer it.  
 2 BY MR. CRITTON:  
 3 Q. Who is that, ma'am?  
 4 MR. HOROWITZ: Don't answer it.  
 5 MR. CRITTON: On what grounds?  
 6 MR. HOROWITZ: Because you are supposed to  
 7 produce this.  
 8 BY MR. CRITTON:  
 9 Q. The next line down where there is a picture  
 10 and it says "Go fuck yourself," 7/2/2006, who is that  
 11 ma'am?  
 12 MR. HOROWITZ: Don't answer it. Don't answer  
 13 it.  
 14 Bob, you need to produce this stuff. You  
 15 can't just surprise people.  
 16 BY MR. CRITTON:  
 17 Q. There is an [REDACTED] in here. Who is [REDACTED]  
 18 please?  
 19 MR. HOROWITZ: Don't answer it.  
 20 BY MR. CRITTON:  
 21 Q. Do you know a person named [REDACTED]  
 22 MR. HOROWITZ: All right.  
 23 THE WITNESS: I'm not going to answer it.  
 24 MR. CRITTON: On what grounds?  
 25

1 Q. Do you remember who you did it for?  
 2 A. It says Kliman, I think.  
 3 Q. And is this the only form that you ever filled  
 4 out for Mr. Kliman, Dr. Kliman?  
 5 A. I mean I filled out a couple of forms.  
 6 Q. Was it testing or was it like background  
 7 information on yourself?  
 8 A. I think both.  
 9 Q. I'm sorry?  
 10 A. I think both.  
 11 Q. Okay. And just so I'm -- in looking at this,  
 12 it looks like what you did is you blacked out any  
 13 portion or kind of circled any aspect that you felt was  
 14 applicable to you; is that how you answered these?  
 15 A. Yes.  
 16 Q. Okay. Would you consider your intellectual  
 17 ability to be above average?  
 18 A. I'd like to think I'm smart.  
 19 Q. Okay. My question is do you rate your  
 20 intellectual ability as above average?  
 21 MR. HOROWITZ: Form.  
 22 THE WITNESS: Is that on here?  
 23 BY MR. CRITTON:  
 24 Q. Can you just answer my question?  
 25 A. Yes.

1 BY MR. CRITTON:  
 2 Q. I'm not talking about this exhibit. If you  
 3 know somebody named [REDACTED] --  
 4 MR. HOROWITZ: Go ahead and answer it.  
 5 THE WITNESS: What [REDACTED] are you talking  
 6 about?  
 7 BY MR. CRITTON:  
 8 Q. Do you know a girl named [REDACTED] that was a  
 9 friend of yours?  
 10 A. When?  
 11 Q. 2006.  
 12 A. Yes.  
 13 Q. Who is, what's her last name?  
 14 A. I think it's [REDACTED], if that's the girl you  
 15 are talking about.  
 16 (The document was marked Defendant's  
 17 Exhibit 7 for identification.)  
 18 BY MR. CRITTON:  
 19 Q. Let me show you Exhibit 7. Do you recognize  
 20 what Exhibit 7 is, ma'am?  
 21 A. Yes.  
 22 Q. What is it?  
 23 A. My psychological social history.  
 24 Q. And when did you do this?  
 25 A. I don't remember.

1 Q. And if you look at question 18, you consider  
 2 your intellectual ability above average, right?  
 3 A. Yes.  
 4 Q. Never held back in school, you made mostly A's  
 5 and B's, right?  
 6 A. Yes.  
 7 Q. Never had trouble in school, never had trouble  
 8 learning to read?  
 9 A. No.  
 10 Q. Did you have a little trouble with math?  
 11 A. Yes.  
 12 Q. Okay. Neither your peers, none of your peers  
 13 ever teased you, made fun of you while you were in  
 14 school, correct?  
 15 A. No.  
 16 Q. And when you were in high school, were you a  
 17 cheerleader?  
 18 A. Yes.  
 19 Q. How many years?  
 20 A. I think for two years. I did basketball  
 21 cheerleading.  
 22 Q. In what, your junior and senior year?  
 23 A. It was my sophomore and junior year.  
 24 Q. Sophomore and junior year, all right. Were  
 25 you in any clubs, any extracurricular activities?

1 A. No.  
 2 Q. Did you play lacrosse?  
 3 A. I didn't actually play for them. I tried out  
 4 for the team, but I never --  
 5 Q. The club team?  
 6 A. Yeah, but I never played on the team.  
 7 Q. What else did you do other than cheerleading?  
 8 A. I just did track for like, for a year.  
 9 Q. Which year?  
 10 A. I think it was my sophomore year.  
 11 Q. Student council? Were you on student council?  
 12 A. No.  
 13 Q. Did you do any kind of volunteer work, helping  
 14 other people?  
 15 A. I mean I didn't do any volunteer work, no.  
 16 Q. Did you do any volunteer work in college?  
 17 A. Yeah, I was part of where like we had this  
 18 hospitality group and I like donate to them and stuff.  
 19 Q. What do you mean you donate? You donate --  
 20 A. Money to them.  
 21 Q. More importantly, did you donate time? Did  
 22 you go and work for any charities like boys' club,  
 23 girls' club, any type of church or other nonprofit  
 24 organization during the time you've been in Orlando?  
 25 A. I mean I had a full load of classes and I was

1 working. I don't have time to, I mean like do a lot of  
 2 stuff.  
 3 Q. How many hours do you take right now?  
 4 A. Right now is my easiest semester. I'm taking  
 5 three classes.  
 6 Q. Three classes?  
 7 A. Uh huh.  
 8 Q. How many hours is that?  
 9 A. Like twelve.  
 10 Q. Twelve hours or nine?  
 11 A. Nine. Yeah, nine hours.  
 12 Q. How many days do you go to school?  
 13 A. Tuesday and Thursday.  
 14 Q. So all your classes are on Tuesdays and  
 15 Thursdays. Are you working at the current time?  
 16 A. Yes.  
 17 Q. Where are you working?  
 18 A. I'm working with my dad and I'm also working  
 19 and I'm trying to start like a business of my own, and  
 20 I'm also working for three different liquor companies.  
 21 Q. Three different what?  
 22 A. Liquor companies.  
 23 Q. Liquor companies?  
 24 A. Yes.  
 25 Q. What do you do for them?

1 A. I do like marketing and promotions.  
 2 Q. In what way?  
 3 A. Just like sampling products and promoting  
 4 products.  
 5 Q. What do you mean sampling products? Do you  
 6 get paid to drink liquor?  
 7 A. You are not allowed to drink at the job.  
 8 Q. What are you sampling then?  
 9 A. I give other people samples of different  
 10 liquors so they can try it.  
 11 Q. Do you go to like ABC Liquor store or Total  
 12 Wine or someplace like that?  
 13 A. We go to bars and restaurants.  
 14 Q. What kind of products do you push? Talking  
 15 like scotch and bourbons or you are doing wines?  
 16 A. I do American Honey and Malibu and Jameson.  
 17 Q. As part of the marketing, do you dress up for  
 18 this?  
 19 A. Yes.  
 20 Q. What do you wear?  
 21 A. We have to wear cowboy boots, a skirt, and  
 22 then just a shirt that says American Honey on it.  
 23 Q. Is it kind of like a modeling gig in addition  
 24 to the marketing?  
 25 A. Sort of, yes.

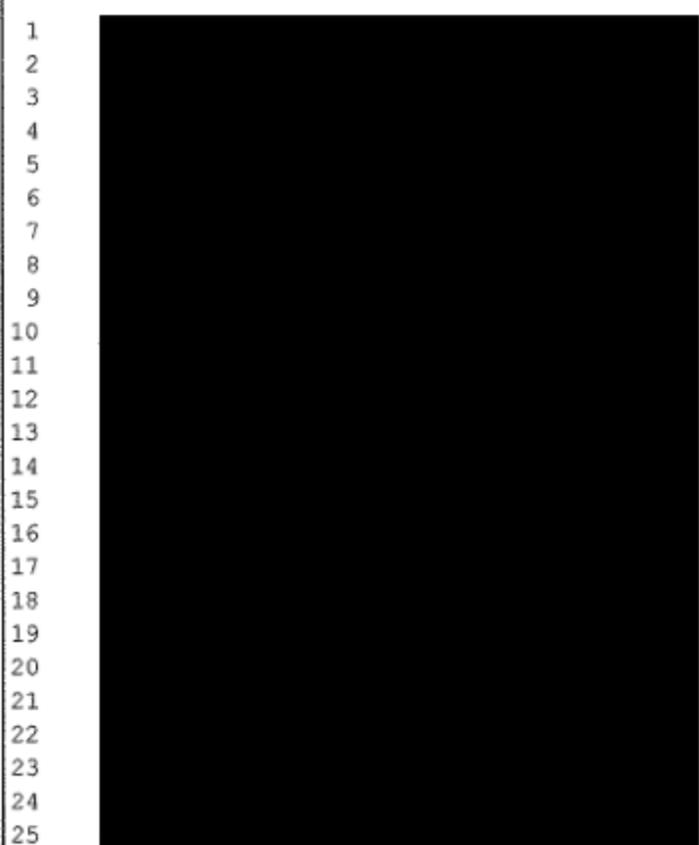
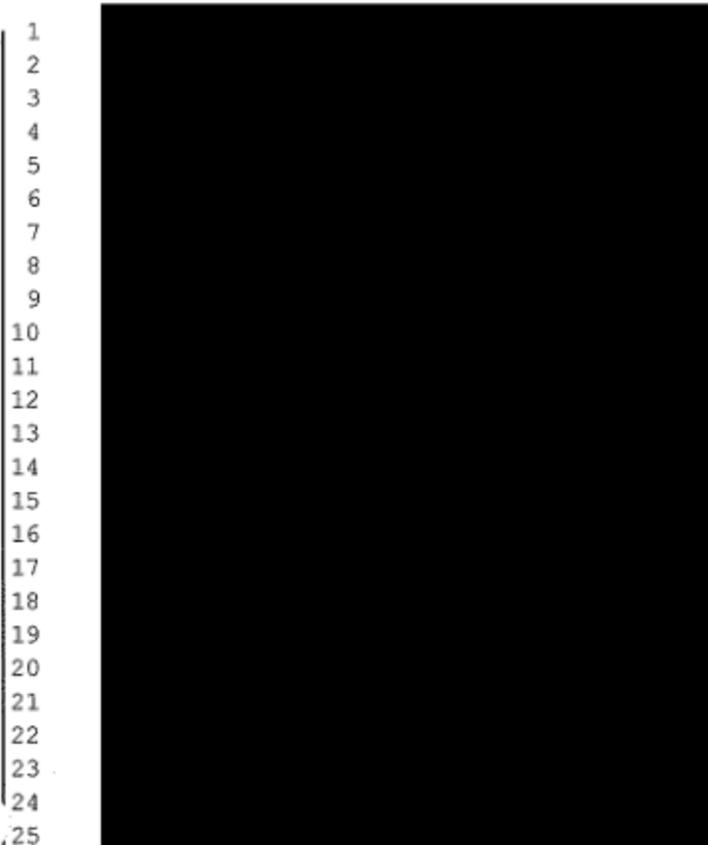
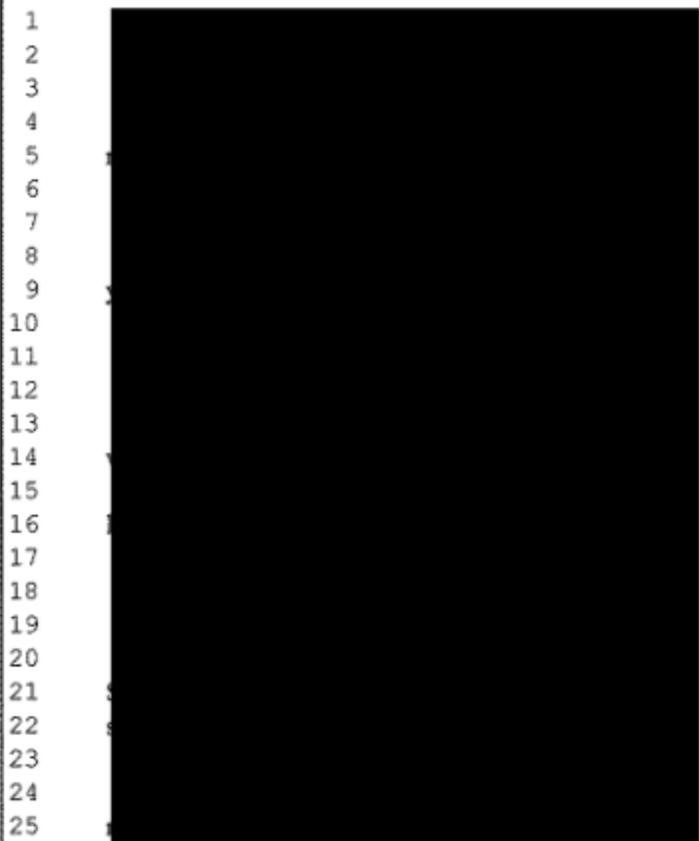
1 Q. And your skirt, short skirts or calf lengths  
 2 or cowboy skirts?  
 3 A. Just normal size. They don't give any size.  
 4 Just normal jeans skirt.  
 5 Q. Is that what you are doing in terms of with  
 6 the liquor?  
 7 A. Yes.  
 8 Q. And how many days a week do you do that?  
 9 A. Whenever I get scheduled for it.  
 10 Q. How many times a month would that be?  
 11 A. Probably about two times a week, three times a  
 12 week.  
 13 Q. And then you said that on the -- you help your  
 14 dad. That's through the internet sales, right?  
 15 A. Yes.  
 16 Q. But you have free time, don't you?  
 17 A. I mean everybody has free time.  
 18 Q. Okay. At least again, this was on  
 19 December 5th of '08, it says which of the following have  
 20 you used, and of the drugs you listed marijuana, right?  
 21 Which you told me earlier today. I'm on 52.  
 22 A. Uh huh.  
 23 Q. Do you see that? It says, "Has there ever  
 24 been a time in essence you drank too much alcohol?"  
 25 You say "Yes, on more than several occasions,"

1 which is consistent with what you told me, and you also  
2 told me you drink several times a week, all of which  
3 would be true, correct?

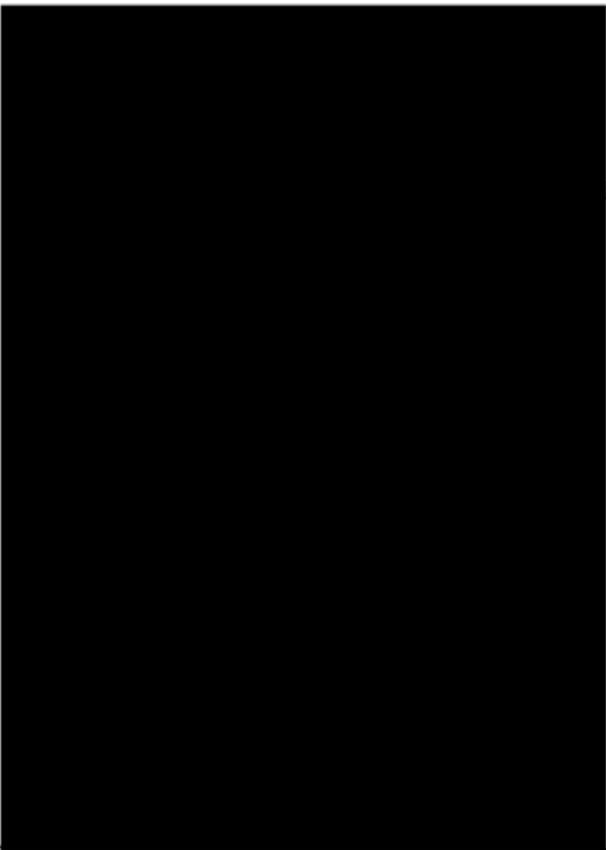
4 A. Yes.

5 Q. At this time it says you were single, but  
6 involved in an intimate relationship.

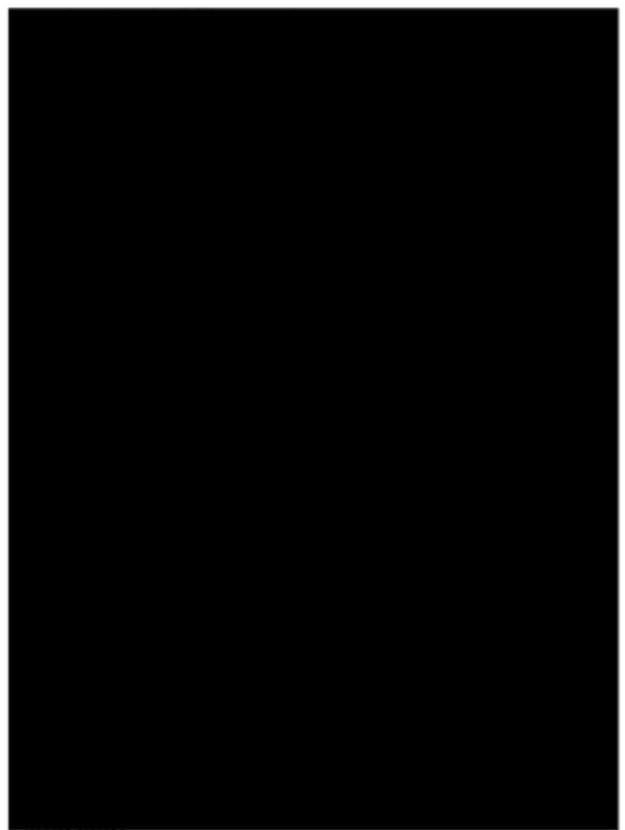
7 Who was that relationship with?



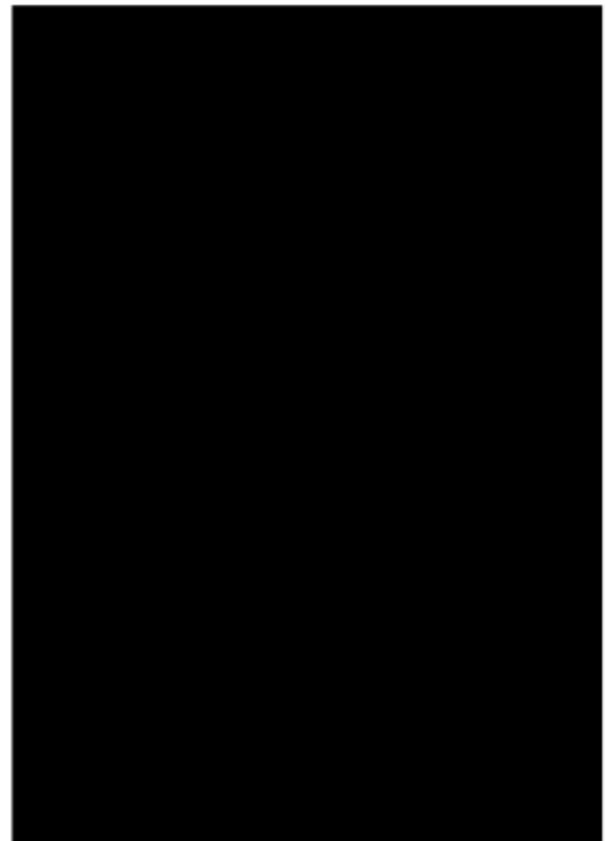
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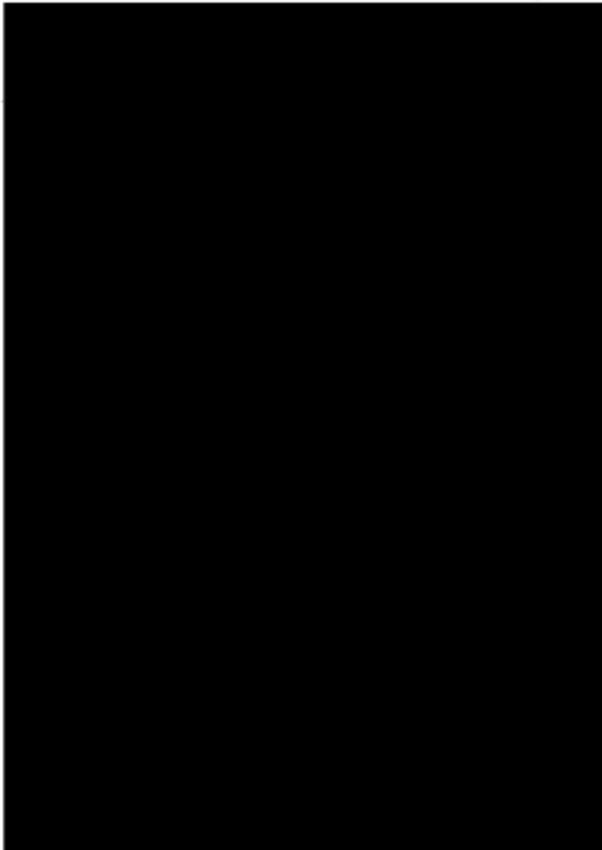
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MR. CRITTON: Let's take a break for five or ten.  
THE VIDEOGRAPHER: Going off the record at 3:54 p.m.  
(A recess was taken.)  
(End of Volume II)

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