

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

JANE DOE NO. 2,
Plaintiff,

-vs-

JEFFREY EPSTEIN,
Defendant.

Related cases:

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

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

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

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

Reported By:
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1 APPEARANCES:
 2 On behalf of the Plaintiffs in related cases
 Nos. 08-80069, 08-80119, 08-80232, 08-80380,
 3 08-80381, 08-80993, 08-80994:
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 7
 8 On behalf of the Defendant Jeffrey Epstein:
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 10 303 Banyan Boulevard
 Suite 400
 11 West Palm Beach, Florida 33401
 Telephone [REDACTED]
 12
 13
 14 Also Present: Sasha Quimby, videographer
 15
 16
 17
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 19
 20
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 25

1 PROCEEDINGS
 2 ---
 3 THE VIDEOGRAPHER: We are back on the record
 4 at 4:08 p.m.
 5 BY MR. CRITTON:
 6 Q. Jane Doe 7, in your supplemental answers to
 7 interrogatories, you listed the names and addresses and
 8 phone numbers, number 18, and I don't know whether I
 9 used that as an exhibit -- this will be Exhibit 9.
 10 (The document was marked Defendant's
 11 Exhibit 9 for identification.)
 12 BY MR. CRITTON:
 13 Q. There are a couple of supplements you filed
 14 which as things come to you, I think, or your attorneys.
 15 Anyhow, this one deals with males that you had sexual
 16 activity. You listed Mr. Evans, Bryant --
 17 MR. HOROWITZ: You handed us two different
 18 things. This is a request to produce.
 19 MR. CRITTON: Oh, I'm sorry.
 20 MR. HOROWITZ: No problem.
 21 MR. CRITTON: Give this back. This will be
 22 number nine.
 23 (Discussion held off the record.)
 24 BY MR. CRITTON:
 25 Q. Is that the right one that has Mr. Evans?

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1 There is a person listed as Bryant. Who is he?
 2 A. He a friend from Orlando. I kind of dated
 3 him.
 4 Q. And so of the five individuals you have here,
 5 Mr. Evans, Bryant, Mackenzie Russell, PJ Toro and Blake
 6 Russell, are the only individuals with whom you have had
 7 any type of sexual activity since the time you were ten
 8 years old?
 9 A. Yeah, other than like kissing. I don't
 10 remember everybody I kissed and stuff like that.
 11 Q. All right. I want to go back to a couple of
 12 areas to make sure I got all the information on it.
 13 At the time that you met with the officers
 14 from Palm Beach, you said, do you remember one of them
 15 being a person named Recarey, R-e-c-a-r-e-y,
 16 Officer Recarey?
 17 A. Yes.
 18 Q. I think you said there were two males. Do you
 19 remember who the other male was?
 20 A. I think his name was Joe something.
 21 Q. Joe something, all right. And, Mr. Recarey's
 22 first name, Detective Recarey's first name is Joe
 23 Recarey.
 24 A. Oh, sorry.
 25 Q. Do you remember what the other person looked

2 (Pages 299 to 302)

1 like? Not Mr. Recarey, but the other one.
 2 A. He was like just an older man. He was kind of
 3 bigger, gray hair, I think.
 4 Q. All right. And in terms of that individual,
 5 did he say anything or was it Officer Recarey who
 6 conducted the interview with you?
 7 A. I think it was Officer Recarey mostly.
 8 Q. Did you ever have any subsequent contact with
 9 him? Did you ever talk to him after the interview on
 10 October 4th of 2005?
 11 A. I don't think so. I don't remember.
 12 Q. When he talked to you, that is, when he
 13 introduced himself to you, did he explain to you how he
 14 found you, that is, how he knew that you may have had
 15 some involvement with Mr. Epstein?
 16 A. I think it was somebody told him.
 17 Q. Did he tell you who the somebody was?
 18 A. No.
 19 Q. Did he tell you when you met with him, and
 20 again before he started the tape of the statement, did
 21 he tell you that, that he had interviewed a number of
 22 other females?
 23 A. I don't remember if he told me that or not.
 24 Q. Did he tell you, you know, tell us everything
 25 because we've heard stories from other people, so we

1 car?
 2 A. Yeah, I think so.
 3 Q. So they actually showed you, was it a color
 4 picture or black and white picture?
 5 A. Black and white.
 6 Q. So they actually had a picture of what, the
 7 rear of your car that had the license plate number?
 8 A. I'm almost positive.
 9 Q. So when they showed you the picture of your
 10 car, and you had said that earlier in your testimony,
 11 you recognized right away as they knew that you had been
 12 there?
 13 A. Yes.
 14 Q. All right. Did you ask him how old the
 15 picture was?
 16 A. No, I didn't.
 17 Q. And they just said that they had had him under
 18 some surveillance for a period of time?
 19 A. Yes.
 20 Q. Did they show you more than one picture of
 21 your car so that, that suggested that they had taken a
 22 picture of your car on a number of occasions?
 23 A. No.
 24 Q. Did they tell you whether they knew any other
 25 people who had been to his house? That is, did they use

1 have an idea of what may have occurred at Mr. Epstein's
 2 house?
 3 A. Like from the very beginning of me going?
 4 Q. No, no, no. When you first met with him after
 5 you sent Mom back into the house, did Officer Recarey
 6 say to you "Hey, Jane Doe 7, you can tell us what went
 7 on because we've heard stories from other people, so
 8 tell us everything that happened"?
 9 That is, did he try to make you comfortable so
 10 you would talk to him?
 11 MR. HOROWITZ: Form.
 12 THE WITNESS: I don't exactly remember what he
 13 said, but basically he showed me the picture of my
 14 car or my license plate or something. He said that
 15 they have been like watching Jeffrey and they know
 16 I've been there because they saw my car there.
 17 BY MR. CRITTON:
 18 Q. Okay. Did they tell you how long they had
 19 been watching Jeffrey?
 20 A. No, I don't think so.
 21 Q. Did you get the impression that over the last
 22 few months they had been watching him?
 23 A. Yes.
 24 Q. Okay. And so the picture they had, did they
 25 have an actual picture of your license plate on your

1 any names?
 2 A. I think they just said other girls in my high
 3 school.
 4 Q. And the only name you gave them was Jane
 5 Doe 4?
 6 A. And [REDACTED]
 7 Q. [REDACTED] Did you give them [REDACTED] too?
 8 A. And S.V., yes.
 9 Q. Did they show you any other photographs of
 10 either his house, any other cars, any other vehicles, or
 11 was it just yours?
 12 A. I think they might have -- yeah, they showed
 13 me a picture of [REDACTED] and they asked me to identify the
 14 girl in the picture, and I identified her as [REDACTED]
 15 Q. Did you ever know what [REDACTED] last name was?
 16 A. It began with a [REDACTED], something.
 17 Q. Did she ever introduce herself to you?
 18 A. Yes.
 19 Q. As [REDACTED], or did she just say my name is
 20 [REDACTED]?
 21 A. I don't remember.
 22 Q. Was she nice to you?
 23 A. Yes.
 24 Q. Friendly?
 25 A. Yes.

1 Q. How old did you think [redacted] was?
 2 A. She looked about in her mid twenties.
 3 Q. All right. And did you tell them that? Did
 4 they ask you about her at all?
 5 A. Yes. I think they just asked if I recognized
 6 her and just asked what I saw her doing there and stuff
 7 like that.
 8 Q. And I think you said earlier that [redacted] called
 9 you during the time, either just before or during the
 10 time you were being interviewed by the police?
 11 A. Yes.
 12 Q. And did you take her call?
 13 A. No.
 14 Q. Did you call her back?
 15 A. No. I just listened to her voicemail.
 16 Q. What did -- did you play the voicemail for the
 17 police?
 18 A. Yes.
 19 Q. Okay. And did they record it?
 20 A. I think so, yes.
 21 Q. What did the voicemail say, to the best of
 22 your knowledge or recollection?
 23 A. Just that "Hi, Jane Doe 7, this is [redacted]." I
 24 think she just asked if there was cops at my house and
 25 if I was talking to them. And she said for me to call

1 he suggest things, like we know this, we know that?
 2 Like your car, we know you were there because here's a
 3 picture of your car and your license plate. Isn't that
 4 your car and license plate?
 5 MR. HOROWITZ: Form.
 6 THE WITNESS: The only thing he suggested is
 7 he just kind of knew I was there, so --
 8 BY MR. CRITTON:
 9 Q. Did he ever tell you what some of the other
 10 females had said had occurred at Mr. Epstein's house?
 11 A. I don't remember exactly what he said to me.
 12 Q. Did they ever tell you that some of the other
 13 females were saying that Mr. Epstein did X or Y with
 14 them? X or Y could be anything, but did he say well, we
 15 know Female ABC did such and such, or at least she says
 16 she did such and such with Mr. Epstein or he did such
 17 and such with her?
 18 Did he suggest that?
 19 A. I don't remember.
 20 Q. Did they ever say -- and I think they asked
 21 you, because I asked you earlier and you had told them
 22 that at least in the visit that you had under oath with
 23 them is that you had, he had not masturbated when you
 24 were there, correct?
 25 MR. HOROWITZ: Form.

1 her back.
 2 Q. But you never did?
 3 A. No. They told me not to.
 4 Q. They being the police?
 5 A. Yes.
 6 Q. Did they tell you anything else to do or not
 7 to do?
 8 A. Just not really to talk about it with anybody.
 9 Q. Did they tell you not to tell your parents?
 10 A. No, they never said that.
 11 Q. Did they tell you that if somebody called you
 12 on behalf of Mr. Epstein not to talk to them?
 13 A. Yes.
 14 Q. Did they mention at that time anything about
 15 the US attorney or the FBI?
 16 A. No.
 17 Q. Did anyone else, did either Officer Recarey or
 18 anyone else from Palm Beach ever try to recontact you
 19 for a followup interview or to clarify something?
 20 A. No.
 21 Q. And I think you told me earlier they never
 22 sent you anything?
 23 A. No.
 24 Q. When Officer Recarey was talking to you, did
 25 he -- and I don't mean this in a negative way, but did

1 BY MR. CRITTON:
 2 Q. That's what you told them that day?
 3 MR. HOROWITZ: Form.
 4 THE WITNESS: I believe so.
 5 BY MR. CRITTON:
 6 Q. And did they say "Well, other females had said
 7 that Mr. Epstein masturbated, did he do that when you
 8 were there?"
 9 Did they suggest things like that in asking
 10 questions?
 11 A. I think so, yes.
 12 Q. Okay. And did he reassert to you, did he tell
 13 you at any time "You can tell us anything, you are not
 14 going to get in any trouble"?
 15 MR. HOROWITZ: Form.
 16 THE WITNESS: I don't remember if he said that
 17 or not.
 18 BY MR. CRITTON:
 19 Q. Well, did he ever say to you if in fact you
 20 received money for having taken people to Mr. Epstein's,
 21 you could be charged with a crime under Florida law?
 22 Did he tell you that?
 23 A. No.
 24 Q. Okay. Did he ever read you your Miranda
 25 rights?

1 A. No.
 2 Q. Were you concerned that you might be charged
 3 with a crime?
 4 A. Yes.
 5 Q. Because you thought you had committed a crime?
 6 MR. HOROWITZ: Form.
 7 THE WITNESS: I just thought I was going to
 8 get in trouble for going there.
 9 BY MR. CRITTON:
 10 Q. Did you -- you also said that [REDACTED]
 11 called you or [REDACTED] as you described.
 12 Did you know who she was before she called
 13 you?
 14 A. No.
 15 Q. She just called you out of the blue one day?
 16 A. I think she called me and -- actually, I think
 17 Agent Nezbit from the FBI might have told me something
 18 that she, she was the attorney general maybe, I think.
 19 I don't --
 20 Q. Nezbit is the female FBI agent, correct?
 21 A. Yes.
 22 Q. And then when she came to Orlando to meet with
 23 you and you met at Starbuck's, she had a male agent with
 24 her as well?
 25 A. Yes.

1 Q. And I think you said you spent an hour and a
 2 half, two hours with them?
 3 A. Yes.
 4 Q. And you recall that they took a taped
 5 statement from you?
 6 A. Yes.
 7 Q. Much like FBI did -- I'm sorry, much like the
 8 Palm Beach police did?
 9 A. Yes.
 10 Q. Did they talk to you for a period of time
 11 before they turned on their tape recorder?
 12 A. I don't remember.
 13 Q. You just remember them taking a taped
 14 statement?
 15 A. Yes.
 16 Q. Okay. Did they also take notes?
 17 A. Yes.
 18 Q. And who was taking the notes, the male or the
 19 FBI Agent Nezbit?
 20 A. The male was.
 21 Q. And was the Agent Nezbit, was she, did she
 22 know that you had -- let me strike that.
 23 Did she have the benefit of any information
 24 from Palm Beach?
 25 MR. HOROWITZ: Form.

1 THE WITNESS: I think so.
 2 BY MR. CRITTON:
 3 Q. Did she have the statement that you had given
 4 to the Palm Beach police?
 5 A. I think so, yes.
 6 Q. Did she ask you about the statement? That is,
 7 did she quiz you from the statement?
 8 Did it sound like she had a transcript of your
 9 statement so she was asking you questions, did this
 10 happen, did that happen?
 11 A. Yeah, she basically asked me if what I told
 12 the Palm Beach police was true. She said that she knew,
 13 you know, a lot of girls did a lot more things with
 14 them, what I have said, and she basically knew, you
 15 know, I felt that she knew a lot more.
 16 So I just told her the truth, that I lied to
 17 them and that I finally, you know, broke down and told
 18 her everything that happened.
 19 Q. And did she encourage you to do that? I mean
 20 did she tell you "A lot of other girls have come forward
 21 and said XY, that XYZ happened at Mr. Epstein's, so
 22 please tell us everything"?
 23 MR. HOROWITZ: Form.
 24 THE WITNESS: Well, she kind of acted like she
 25 already knew and she knew a lot more went on than

1 what I told the officers in Palm Beach.
 2 BY MR. CRITTON:
 3 Q. And whether she did or not, you don't know,
 4 that's how she played it, so to speak?
 5 A. Yes.
 6 Q. All right. Did, after the hour or two that
 7 you spent with Agent Nezbit, was she someone who -- did
 8 you get emotional with Agent Nezbit?
 9 A. Yeah, I mean I felt like I could like open up
 10 to her more than I could guys, you know.
 11 Q. Did she give you a hug when you left?
 12 A. No.
 13 Q. Shake hands?
 14 A. Yes.
 15 Q. Was she warm, comforting?
 16 A. Yeah, she was nice.
 17 Q. And did she give you her card and say "Jane
 18 Doe 7, if you ever have any issues associated with this,
 19 you can call me any time at this number"?
 20 A. Yes.
 21 Q. All right. And did you ever call her?
 22 A. Yes, I called her a couple of times.
 23 Q. For what?
 24 A. Just called her to ask what was going on with
 25 the case and if she heard any news and things like that.

1 Q. Did you ever call her back to get the name of
 2 an attorney?
 3 A. No.
 4 Q. And I think you told me she said if you ever
 5 need the name of an attorney, she could give you one,
 6 but you would have to call her?
 7 MR. HOROWITZ: Form.
 8 THE WITNESS: I think Marie was the one that
 9 said about the attorney stuff.
 10 BY MR. CRITTON:
 11 Q. Okay, when she called you, when she, meaning
 12 Marie, called you?
 13 A. (Witness nods head up and down.)
 14 Q. Did Officer Nezbit ever call you independently
 15 of you calling her?
 16 A. About what?
 17 Q. Whatever.
 18 A. No.
 19 Q. You said you called her on two occasions to
 20 find out status.
 21 A. Yeah.
 22 Q. Okay. And I think you told me you don't know
 23 when you first talked to her.
 24 A. She called me again to ask me if there were
 25 any details that I left out or anything like that. Just

1 A. Maybe a month maybe.
 2 Q. Did they arrange that before they came back up
 3 or did they call you out of the blue?
 4 A. Well, no, they arranged it to come back up.
 5 Q. Why did they tell you they needed to see you
 6 again?
 7 A. They just wanted to make sure everything was
 8 correct and go over everything with me again.
 9 Q. Did they have like a statement that they were
 10 now reading from?
 11 Did they have an outline that they were
 12 reading from when they came to meet with you on the
 13 second occasion?
 14 A. I don't remember.
 15 Q. How long did that meeting last?
 16 A. I think about an hour.
 17 Q. And it was just the two of them?
 18 A. Yes.
 19 Q. Did they record you at that occasion again?
 20 A. I think so, yes.
 21 Q. So on both occasions that the FBI met with
 22 you, you recall them taking a recorded statement from
 23 you?
 24 A. Yes.
 25 Q. Or recording the session, correct?

1 basically asked me if I remembered anything. She called
 2 me about that.
 3 Q. All right. And you told her what?
 4 Did you add any details?
 5 A. I don't remember.
 6 Q. That's when she called you?
 7 A. Yes.
 8 Q. Okay. And then, and that's the only time she
 9 ever called you after the first interview?
 10 A. Well, no, they came back up to Orlando.
 11 Q. A second time?
 12 A. Yes.
 13 Q. Oh, I didn't know that. All right, they came
 14 back a second time. Meet at Starbuck's again?
 15 A. No, we met at the Radisson.
 16 Q. All right. Were they staying there?
 17 A. I think, yeah. Well, I don't know if they
 18 were staying there or not actually.
 19 Q. Where did you meet, in the restaurant?
 20 A. No, we met like in a conference center.
 21 Q. Who was there other than you?
 22 A. The same two people, just me and her and the
 23 same guy.
 24 Q. How much time transpired between the first
 25 visit and the second visit?

1 A. Yes.
 2 Q. And on the second occasion did you provide
 3 them any additional information?
 4 A. I don't remember.
 5 Q. Did they provide you any additional
 6 information, such as we've talked to a number of other
 7 females and they have told us X, Y and Z, did this
 8 happen? Did that happen?
 9 MR. HOROWITZ: Form.
 10 THE WITNESS: I think they, yeah, they just, I
 11 think they, yeah, said something like that, yeah.
 12 BY MR. CRITTON:
 13 Q. So they gave you some more at least
 14 information. Again, you don't know whether it's true or
 15 not, but they said "Well, we found out this or we found
 16 out that. Did that happen to you?"
 17 Did they ask questions like that?
 18 A. I believe so.
 19 Q. All right. Did they, after that second
 20 occasion, did they ever recontact you?
 21 A. Agent Nezbit did, just, she would call me and
 22 fill me in on what was going on.
 23 Q. How many more times did Agent Nezbit call?
 24 A. I think once or twice after that. She didn't
 25 call me a lot.

1 Q. Did she ever ask you what your feelings were
2 about any criminal prosecutions directed to Mr. Epstein?

3 A. No.

4 Q. Pardon?

5 A. No.

6 Q. Did you know who -- and I may have asked you
7 this, but let me just clarify it. Before [REDACTED]
8 [REDACTED] called you, did know who she was?

9 A. I want to say I don't remember. I think Agent
10 Nezbitt might have said something about her to me. And
11 then she just called and --

12 Q. Do you remember what she said, she, Nezbitt
13 said about [REDACTED]?

14 A. No. It was towards the end of everything, and
15 I think she just updated me on everything that was going
16 on. Might have told me like who she was.

17 Q. And at the time, so if -- and I know that, I
18 think you said that at the time that you spoke with Jane
19 Doe 4 in the summer of '08, you did not have an
20 attorney, or your recollection was you didn't think you
21 had an attorney at that time. You may have spoken with
22 Mr. Herman, but you may not have had an attorney.

23 So [REDACTED] would have had to have spoken with
24 you sometime before Jane Doe 4 came to stay with you in
25 the summer of '08; is that your best recollection?

1 questions.

2 Q. And you said a lawyer to protect yourself.
3 Protect yourself from what?

4 MR. HOROWITZ: Form.

5 BY MR. CRITTON:

6 Q. What did she tell you?

7 A. I don't, I don't know what she was referring
8 to.

9 Q. Okay. Did she tell you you might have a civil
10 claim or you would have a civil claim against
11 Mr. Epstein?

12 A. No.

13 Q. Did she tell you the deal that the government
14 had worked out or was attempting to work out would
15 provide a civil remedy for individuals who had gone to
16 Mr. Epstein, females who had gone to Mr. Epstein's
17 house?

18 A. No.

19 Q. Do you ever remember receiving a letter from
20 her that said you may have a civil remedy that you can
21 pursue under a specific federal statute?

22 A. I think I received a letter, but I don't
23 remember what it said. It might have said something
24 like that.

25 Q. Do you ever remember receiving a letter from

1 A. Yes.

2 Q. Do you remember how many months before Jane
3 Doe 4 came there that you would have spoken with [REDACTED]
4 [REDACTED]?

5 A. Probably I think a while. Probably like, I
6 don't know, six months.

7 Q. All right. And you only spoke with her on
8 that one occasion?

9 A. Yes.

10 Q. Did she ever tell you "If you ever have any
11 questions, you can call me"?

12 A. Yeah, she gave me a number to call.

13 Q. Did you ever follow up and try to call her for
14 any reason?

15 A. No.

16 Q. When she filled you in on what was going on,
17 what exactly did she say to you?

18 A. She just told me about the criminal case. I
19 forget exactly what she said.

20 And then she just explained all the like legal
21 terms and what was going on. She said, you know, "Other
22 people are getting lawyers, if you want to protect
23 yourself, you know, you could get a lawyer too."

24 But she didn't give me any names or numbers,
25 but she did give me a number to call if I had any more

1 Robert Josefsberg from Podhurst Orseck saying he was the
2 attorney representative who had been appointed to
3 represent individuals who the government had deemed to
4 have been, quote, unquote, victims?

5 A. No, I never got a letter from him.

6 Q. Did you ever hear from any other government
7 agent, government agent for the United States government
8 who purported to work for the government other than the
9 two FBI agents and [REDACTED]?

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

11 Q. Did you ever hear from anyone else associated
12 with any other police department other than
13 Officer Recarey and whoever the other Palm Beach police
14 officer was?

15 A. No.

16 Q. Did your dad know any of the officers, having
17 been associated with the Town of Palm Beach or employed
18 by the Town of Palm Beach?

19 A. No.

20 Q. Did he ever see anyone in the Town of Palm
21 Beach about this situation, to your knowledge? That is,
22 did he ever go talk to the mayor or the chief-of-police
23 about you and Mr. Epstein?

24 A. No.

25 Q. Other than the time that you told your mom and

1 your dad, you disclosed to them, that is the day that
2 Officer Recarey was there, October 4 of 2005, has your
3 mom ever discussed it with you? Not necessarily the
4 details, but how she feels about it.

5 A. I mean she's read the newspapers and obviously
6 she doesn't like him, but I mine she actually didn't
7 want me to go ahead with the lawsuit.

8 Q. She didn't?

9 A. No.

10 Q. Why not?

11 MR. HOROWITZ: Form.

12 BY MR. CRITTON:

13 Q. What did she tell you?

14 A. She thought it would bring more stress and
15 anxiety on me.

16 Q. Has it?

17 A. I mean, of course, hearing everything, hearing
18 his name brings anxiety and I get depressed and sad over
19 it, yeah.

20 Q. Over the lawsuit?

21 MR. HOROWITZ: Form.

22 THE WITNESS: Not just over the lawsuit, but
23 hearing his name, it brings back memories.

24 BY MR. CRITTON:

25 Q. How about your dad, how did he feel about the

1 County to work?

2 A. No. They just said wherever I get a job at.

3 Q. Okay. In terms of your parents, are you
4 closer, like if you had a personal problem or an issue,
5 would you more likely call your mom or your dad?

6 A. I mean either one really. I'm not more close
7 to either of them.

8 Q. Both would be supportive of you, both
9 emotionally and as well financially if they thought that
10 it was necessary?

11 MR. HOROWITZ: Form.

12 THE WITNESS: Yes.

13 BY MR. CRITTON:

14 Q. And that's always been true with you and your
15 family and your mom and your dad?

16 A. Yes.

17 Q. Okay. If you had a friend or friends that you
18 were going to turn to now that you needed help or
19 assistance in some fashion, you didn't want to tell your
20 mom or your dad, would Jane Doe 4 be one of the people
21 you would go to?

22 A. Yes.

23 Q. Who else? Who else would you consider would
24 be a good friend that you would go to?

25 A. Jane Doe 4 or Jane Doe 3 really.

1 lawsuit? Did he ever express any opinion?

2 A. My dad just basically said it was up to me to
3 do what I wanted to do.

4 Q. Has your mom ever said to you that she's angry
5 with you for ever having gone there?

6 A. I mean no. She was upset about it, and at
7 first she like asked me how I could have been so stupid
8 and why I would have went there. But I mean she
9 understands that I was young and confused at the time,
10 so --

11 Q. Did your dad ever ask you?

12 A. No. My dad didn't really talk about it.

13 Q. Are you closer to your mom or your dad? You
14 love them both, right?

15 A. Yeah.

16 Q. And they both love you?

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

18 Q. Supportive of you?

19 A. Yes.

20 Q. And they are supportive of you getting a
21 career, certainly a job?

22 A. Yes.

23 Q. Every parent wants their child to get a job,
24 that's good.

25 Do they want you to come back to Palm Beach

1 Q. I'm sorry?

2 A. Jane Doe 4 or Jane Doe 3.

3 Q. Jane Doe 3?

4 A. Yes.

5 Q. Looking briefly at your work history, looks
6 like you worked in, when you got up to Orlando you
7 worked at [REDACTED]

8 A. Yes.

9 Q. And you were a cart girl?

10 A. Yes.

11 Q. All right. So you drove around on the golf
12 course?

13 A. Yes.

14 Q. For refreshments and food for guys? Guys and
15 gals, whoever was playing golf?

16 A. Yes.

17 Q. All right. And then you worked -- and that
18 was in '07, and is the only job that you have had since
19 then, although I think you said you are working
20 someplace now. I'll get back to that.

21 Then you worked at [REDACTED] in 2008, the whole
22 year?

23 A. Yeah, about a year. I don't know actually
24 have that.

25 Q. So you went from [REDACTED] -

1 MR. HOROWITZ: Do you want to show her that?
 2 MR. CRITTON: That was in Exhibit 2. She
 3 should have it right in front of her.
 4 MR. HOROWITZ: That was like eight exhibits
 5 ago.
 6 MR. CRITTON: I can help you. Maybe you need
 7 an assistant to help you sort through the exhibits.
 8 BY MR. CRITTON:
 9 Q. Are you with me, item two? You say you worked
 10 at [REDACTED].
 11 A. Yes.
 12 Q. In 2007. That was the only job you had in
 13 2007, correct?
 14 A. Yes.
 15 Q. Okay. And then 2008 was the [REDACTED] part of
 16 your -- I think you told us earlier it was part of your
 17 work experience through school?
 18 A. Yes.
 19 Q. Okay. And you worked there for all of 2008?
 20 A. Yes.
 21 Q. Did you work anyplace else in 2008?
 22 A. 2008, no, I don't believe so.
 23 Q. By the way, were you with Jane Doe 4 when she
 24 was with [REDACTED] up in Orlando and she went to [REDACTED]
 25 [REDACTED] and tried out as a stripper?

1 A. No.
 2 Q. Are you aware of the circumstances of her
 3 doing it?
 4 A. I learned about it.
 5 Q. Who did you hear about it from?
 6 A. Jane Doe 4 told me.
 7 Q. What did she say about it?
 8 A. Nothing really. She just said she went to
 9 [REDACTED]'s work and it was her birthday and they were just
 10 kind of joking around.
 11 Q. Did she tell you she got up on the stage and
 12 danced for a while and made some money?
 13 A. She didn't tell me she made money. She just
 14 said she did it as a joke.
 15 Q. And now where are you currently working again?
 16 Tell me again.
 17 A. [REDACTED]
 18 Q. That's right. [REDACTED] does what? Is
 19 that, [REDACTED] is that all the same company?
 20 A. They are two different companies. [REDACTED]
 21 [REDACTED] is separate. And then [REDACTED] are the
 22 same company.
 23 Q. [REDACTED] are the liquor people,
 24 right?
 25 A. Yes.

1 Q. [REDACTED] does what?
 2 A. They are liquor too.
 3 Q. But they are two different entities?
 4 A. Yes. One is just like a modeling agency.
 5 Well, it's just like an agency where they have girls
 6 that they hire to like the liquor company, and that's
 7 out of Tampa, but they have jobs in jobs in Orlando that
 8 I do. I have driven to Tampa before.
 9 Q. So you will go to Tampa to do this work too?
 10 A. Yes, sometimes.
 11 Q. How much do you get paid for doing that?
 12 A. \$25 an hour.
 13 Q. 25 bucks an hour?
 14 A. Uh huh.
 15 Q. All you have to do is go to a bar, look
 16 pretty, have a cute outfit on, and hand out liquor?
 17 MR. HOROWITZ: Form.
 18 THE WITNESS: Yes.
 19 BY MR. CRITTON:
 20 Q. That's basically it, isn't it?
 21 MR. HOROWITZ: You are jealous.
 22 BY MR. CRITTON:
 23 Q. This is not professional work. I couldn't do
 24 it. I wouldn't look good in a skirt.
 25 But in essence, they give you 25 bucks an

1 hour, and how long is the gig usually?
 2 A. It depends. Sometimes it's like four bars we
 3 go to, sometimes it's two. Sometimes it's five bars.
 4 Q. So it might be six to ten hours?
 5 A. It's never ten hours, but it's usually from
 6 like three to five hours.
 7 Q. All right. Do they pay in cash?
 8 A. No, I get a paycheck.
 9 Q. So you get a 1099?
 10 A. Yes.
 11 Q. And how often do you work for [REDACTED]
 12 or [REDACTED] during the course of a month?
 13 A. About like twice a week maybe, so --
 14 Q. Is it almost exclusively in Orlando? You said
 15 you have been to Tampa.
 16 A. Yes.
 17 Q. Have you been to any other cities other than
 18 Tampa?
 19 A. No.
 20 Q. If you have to go to Tampa, do they put you up
 21 overnight?
 22 A. No.
 23 Q. How long have you been doing this twice a
 24 week?
 25 A. I mean I don't always do it twice a week. I

1 started picking up more shifts now that I only have
 2 three classes. Last semester I was taking six classes,
 3 so I didn't really have time to do that much.
 4 Q. Now you do it approximately two times a week?
 5 A. Yeah, I try to pick up as many shifts as I
 6 can.
 7 Q. And they just go to different bars in Orlando?
 8 A. Not just bars. Restaurants too.
 9 Do you have any Advil at all?
 10 MR. CRITTON: Let's go off the record.
 11 THE VIDEOGRAPHER: Going off the record,
 12 4:21 p.m.
 13 (A recess was taken.)
 14 THE VIDEOGRAPHER: We're back on the record at
 15 4:48 p.m.
 16 BY MR. CRITTON:
 17 Q. Ma'am, have you ever been treated in a drug or
 18 an alcohol program?
 19 A. No.
 20 Q. Have you ever had an HIV test?
 21 A. No.
 22 Q. To the best of your knowledge, you are not HIV
 23 positive?
 24 A. No.
 25 Q. All right. Have you ever had any surgery of

1 A. No.
 2 Q. Jane Doe?
 3 A. No.
 4 Q. Jane Doe 6?
 5 A. No.
 6 Q. Jane Doe 2?
 7 A. No.
 8 Q. L.L.?
 9 A. No.
 10 Q. K.H.?
 11 A. Yes.
 12 Q. How do you know K.H.?
 13 A. She goes to my school, or went to my school,
 14 high school.
 15 Q. How about Jane Doe 101?
 16 A. Sounds kind of familiar.
 17 Q. But you can't place her?
 18 A. Uh uh.
 19 MR. HOROWITZ: No?
 20 THE WITNESS: No.
 21 BY MR. CRITTON:
 22 Q. How about L.P., does that mean anything to
 23 you?
 24 A. No.
 25 Q. Is K.H. your age or older?

1 any kind?
 2 A. Just wisdom teeth.
 3 Q. I'm sorry, have you ever had any cosmetic
 4 surgery?
 5 A. No.
 6 Q. Have you ever been pregnant?
 7 A. No.
 8 Q. Jane Doe 3, how long have you known her?
 9 A. Since I was a sophomore in high school.
 10 Q. So that would have been the '03 time period?
 11 A. Yes.
 12 Q. And was Jane Doe 3 your age?
 13 A. She was a year younger than me.
 14 Q. How did you all become friends?
 15 A. I believe Jane Doe 4 knew her and her sister.
 16 Q. Jane Doe 4?
 17 A. Jane Doe 4.
 18 Q. Does she go by Jane Doe 4?
 19 A. I mean no. I call her Jane Doe 4.
 20 Q. Okay. It might have been my hearing. So she
 21 was a friend of Jane Doe 4's?
 22 A. (Witness nods head up and down.)
 23 Q. Have you ever met anybody by the name of [REDACTED]?
 24 A. Kind of sounds familiar.
 25 Q. [REDACTED]?

1 A. She's a year older than me.
 2 Q. Who was she friends with? Let me rephrase the
 3 question.
 4 Was she friends with any of your friends, your
 5 group?
 6 A. Yes.
 7 Q. Who?
 8 A. Jane Doe 4 and Jane Doe 3.
 9 Q. Do you know whether [REDACTED] ever went to
 10 Mr. Epstein's home?
 11 A. Well [REDACTED] told me I think she went there.
 12 Q. This is [REDACTED]?
 13 A. Yes, she is also friends with [REDACTED] too.
 14 Q. I'm sorry?
 15 A. She is also friends with [REDACTED], good friends.
 16 Q. Were you aware, I think you told me earlier,
 17 and I may have forgotten, you told me you were aware
 18 back at the time when you were going to Mr. Epstein's or
 19 around that time period that [REDACTED] had been there to
 20 Epstein's as well?
 21 A. Yes.
 22 Q. And she told you on or about that time that
 23 [REDACTED] had been there?
 24 A. No, I didn't find out about [REDACTED] until --
 25 Q. When did you find that out?

1 A. When I was talking to [redacted] when I told you
 2 recently I talked to [redacted] about it.
 3 Q. Did she say anything about [redacted], whether she
 4 had brought any kind of action against Mr. Epstein or
 5 intended to bring any action against him?
 6 A. Yeah, I think she said she had a lawyer, but
 7 she didn't really go into detail.
 8 Q. Did she know what had happened, whether the
 9 lawyer had filed a lawsuit or not?
 10 A. No.
 11 Q. So at least back at the time you knew [redacted],
 12 but you didn't, you had no knowledge that she had been
 13 to Mr. Epstein's house?
 14 A. No, we weren't good friends. I just know of
 15 her because she was friends with my friends.
 16 Q. Of the people that you knew who went to
 17 Mr. Epstein's house back in the time period that you
 18 were there, it would have been Jane Doe 3, [redacted]?
 19 A. Yes.
 20 Q. You are pretty sure, [redacted]?
 21 A. Yes.
 22 Q. Jane Doe 4?
 23 A. Yes.
 24 Q. [redacted]?
 25 A. Yes.

1 Q. And [redacted]?
 2 A. Yes.
 3 Q. Anyone else have I missed?
 4 A. I don't think so.
 5 Q. Okay. As to any of [redacted]
 6 A. I heard of a girl [redacted], but I didn't know her.
 7 Q. Do you remember [redacted] last name?
 8 A. No.
 9 Q. If I said [redacted], would that mean anything
 10 to you?
 11 A. I don't know if that was her last name or not.
 12 Q. Just somebody named [redacted]. Do you remember
 13 what she looked like?
 14 A. Blonde hair.
 15 Q. Older?
 16 A. I think she was in our grade.
 17 Q. Just not in your friend group?
 18 A. No.
 19 Q. Of the females, Jane Doe 3, [redacted],
 20 Jane Doe 4, [redacted], did any of those people ever
 21 tell you that Mr. Epstein -- and tell you now, not what
 22 you assume -- that anything had happened back at the
 23 time, that anything had ever occurred at Mr. Epstein's
 24 house that had been, they considered to be
 25 inappropriate?

1 A. We didn't really talk about it. The only
 2 girls I talked about it with would be Jane Doe 4 and
 3 Jane Doe 3.
 4 Q. Okay. That's what my question is. Did any of
 5 those individuals, Jane Doe 3, [redacted], Jane
 6 Doe [redacted], ever say to you that anything that
 7 had occurred, at the time that anything that had
 8 occurred was inappropriate?
 9 A. I mean I didn't talk about it with them.
 10 Q. So nobody brought it up and said "You won't
 11 believe what happened"? Nobody said something like to
 12 you?
 13 A. No, they all kind of kept it to themselves I
 14 think because they were embarrassed.
 15 Q. So no one said -- did anyone ever tell you
 16 that Mr. Epstein had been in any way aggressive with
 17 them, had used any kind of physical or verbal force or
 18 had coerced them to do anything, or that issue never was
 19 discussed back then?
 20 A. We just didn't discuss it.
 21 Q. But no one raised it? If something had
 22 happened and somebody had discussed it, that's something
 23 that you would have remembered?
 24 A. Yes, I don't know.
 25 Q. With regard to Jane Doe 3, you said you knew

1 her when she was -- so you would have been a junior, she
 2 would have been a sophomore?
 3 A. I think I knew her my sophomore year when she
 4 was a freshman.
 5 Q. So she would have been a freshman?
 6 A. Yeah.
 7 Q. Were you aware that -- let me strike that. Do
 8 you know whether you had gone to Mr. Epstein's before
 9 Jane Doe 3 went or whether she went afterward, after you
 10 had already gone? Does that make sense?
 11 MR. HOROWITZ: No, try that again.
 12 BY MR. CRITTON:
 13 Q. Okay. Do you know whether you went to
 14 Mr. Epstein's first or Jane Doe 3 went to Epstein's
 15 first?
 16 A. No.
 17 Q. You don't remember?
 18 A. No.
 19 Q. Okay. If I asked you to assume that Jane Doe
 20 3 says that she went to Mr. Epstein's after you had
 21 already been there, would you dispute that?
 22 A. I mean yes, because I don't really know, I
 23 don't remember.
 24 Q. But so if Jane Doe 3 said no, I asked Jane Doe
 25 7 and Jane Doe 7 said she had been to Mr. Epstein's

1 before --
 2 MR. HOROWITZ: Form.
 3 THE WITNESS: If that's what she said --
 4 BY MR. CRITTON:
 5 Q. Then you would go with her recollection on
 6 that?
 7 MR. HOROWITZ: Form.
 8 THE WITNESS: Yes.
 9 BY MR. CRITTON:
 10 Q. Do you know how many times -- well, let me
 11 strike that, because you don't remember of your own
 12 independent recollection who went first, Jane Doe 3 or
 13 you.
 14 Did Jane Doe 3 ever express to you that
 15 anything inappropriate -- let me strike that.
 16 Have you ever discussed what Jane Doe 3's
 17 visits were with Mr. Epstein? Did you ever discuss that
 18 with her?
 19 A. No. I mean she shared her feelings about him
 20 with me, but she never discussed what happened.
 21 Q. And when you said her feelings, is that
 22 recently?
 23 A. I mean I don't remember if she did back then,
 24 but she has recently.
 25 Q. Pardon?

1 Q. Okay. Did you go out with her?
 2 A. Yes.
 3 Q. Where did you all go?
 4 A. Went to Noche.
 5 Q. Up in Palm Beach Gardens?
 6 A. Yes.
 7 Q. That's at the Soverel Marina?
 8 A. Yes.
 9 Q. Who else was there?
 10 A. Just her and [REDACTED] and two other girls I didn't
 11 know.
 12 Q. [REDACTED] who?
 13 A. [REDACTED]
 14 Q. Do you know whether J.S., was she one of your
 15 friends too back at that time?
 16 A. Yes.
 17 Q. Did she ever go to Epstein's?
 18 A. Yes.
 19 Q. How do you know that?
 20 A. Because she told me.
 21 Q. Why did she tell you? What made her tell you
 22 that?
 23 MR. HOROWITZ: Form.
 24 THE WITNESS: I don't remember.
 25

1 A. I don't remember what she said about him back
 2 then, but I mean recently she has.
 3 Q. And what has she said recently?
 4 A. Just that she thinks he's like a horrible
 5 person and she thinks that the justice system didn't
 6 work for him at all, and she told me about how he's now
 7 on probation and out of jail, and just stuff like that.
 8 Q. With Jane Doe 3, have you ever met her
 9 husband?
 10 A. No.
 11 Q. Did you know she was married?
 12 A. Yeah, she told me.
 13 Q. When is the last time you talked to Jane Doe
 14 3?
 15 A. I talked to her recently.
 16 Q. Last couple of weeks?
 17 A. Yes.
 18 Q. When is the last time you saw her?
 19 A. The last time I was down in Palm Beach.
 20 Q. Which was when, February?
 21 A. No, I don't really remember.
 22 Q. Where did you see her?
 23 A. Actually I saw her, I was recently, I was here
 24 before I went down to Key West and I saw her. It was
 25 her birthday.

1 BY MR. CRITTON:
 2 Q. Did she know that you had been to Epstein's?
 3 A. Yes.
 4 Q. Did she know that you are a plaintiff in a
 5 lawsuit?
 6 MR. HOROWITZ: Form.
 7 THE WITNESS: Yes.
 8 BY MR. CRITTON:
 9 Q. How did she know you were a plaintiff in a
 10 lawsuit?
 11 MR. HOROWITZ: Form.
 12 THE WITNESS: I don't know who told her. She
 13 asked me about it.
 14 BY MR. CRITTON:
 15 Q. Did you confirm to her that you had in fact
 16 brought a suit against Mr. Epstein?
 17 A. Yes.
 18 Q. If somebody asks you whether you are a
 19 plaintiff in a lawsuit against Mr. Epstein, do you tell
 20 them yes?
 21 A. If they are one of my close friends. If I
 22 don't know them, no.
 23 Q. Okay. Well [REDACTED] is she a friend as you
 24 described earlier?
 25 A. Yes.

1 Q. Or a good friend?
 2 A. She's a friend, yes.
 3 Q. Someone you might trust or you might not?
 4 A. She knew about it before when we were in high
 5 school.
 6 Q. She knew what, that you had gone there?
 7 A. Yes.
 8 Q. How did she know?
 9 MR. HOROWITZ: Form.
 10 THE WITNESS: Everybody knew. She was in our
 11 friend group.
 12 BY MR. CRITTON:
 13 Q. So everybody who was in your friend group knew
 14 who had gone to Epstein's?
 15 A. I mean basically it was me, Jane Doe 4, [REDACTED],
 16 Jane Doe 3, we were all friends, so we all knew.
 17 Q. And did J.S. ever describe her visits, visit
 18 or visits to Epstein's?
 19 A. I think she only went once.
 20 Q. Did she tell you why?
 21 A. Yeah, she said that he like scared her or
 22 something and tried to like make her do something and
 23 she never went back.
 24 Q. Okay. Were you still going to Epstein's at
 25 the time you heard that?

1 A. Yeah.
 2 Q. And she said she had given a deposition?
 3 A. Yes.
 4 Q. Do you know if she's married?
 5 A. She said she was divorced.
 6 Q. She told you she was divorced?
 7 A. Or they are separated, not divorced, I think.
 8 Q. Which did she tell you?
 9 A. I think separated.
 10 Q. Did she tell you why?
 11 A. I think she was kind of embarrassed about it,
 12 so she didn't really go into detail with me.
 13 Q. Did you go to her wedding when she got
 14 married?
 15 A. No.
 16 Q. Have you ever -- she has a child, doesn't she?
 17 A. No.
 18 Q. She doesn't have a child?
 19 A. No.
 20 Q. Jane Doe 3, was she someone, Jane Doe 3, did
 21 you see her do, when she drank with you all in high
 22 school, alcohol?
 23 A. Yes.
 24 Q. And did you see her do drugs in high school?
 25 A. No.

1 A. I don't remember when it was.
 2 Q. Did you say to her that never happened to me?
 3 A. I don't remember exactly what I told her. I
 4 just remember her telling me that.
 5 Q. Did she say that she has any interest in
 6 bringing a lawsuit against him?
 7 A. No.
 8 Q. Did she ask you how your lawsuit was going?
 9 A. No.
 10 Q. When you saw Jane Doe 3, you went to Noce,
 11 what time did you all meet?
 12 A. I think around eleven. I was driving home
 13 from Orlando to visit my parents and then go to Key
 14 West.
 15 Q. And how long did you stay?
 16 A. Not long, just like two hours.
 17 Q. Had a couple of drinks and then headed home?
 18 A. Yes.
 19 Q. Did Jane Doe 3 tell you that she had given her
 20 deposition at that point?
 21 A. I don't think she has given it yet, at that
 22 point, no.
 23 Q. But you subsequently talked to her?
 24 A. Yes, recently.
 25 Q. Over the phone?

1 Q. Okay. So if she was doing cocaine or ecstasy
 2 or xanax, again, you never saw it?
 3 MR. HOROWITZ: Form.
 4 THE WITNESS: No. My friends knew I didn't do
 5 it, so some of them would try to hide it or not do
 6 it around me. So I never really saw them, whoever
 7 did what.
 8 BY MR. CRITTON:
 9 Q. I think you told me you've never been in a
 10 hospital?
 11 MR. HOROWITZ: Form.
 12 BY MR. CRITTON:
 13 Q. Right?
 14 A. Not that I can recall, no.
 15 Q. I asked you what you told the Palm Beach
 16 police the first time you went to Mr. Epstein's house,
 17 what you told them as to how you ended up going to
 18 Epstein's. I asked you what you had told them.
 19 Now my question to you is I never asked you
 20 what you told the FBI. At this point I'm beyond that,
 21 so let me ask this question.
 22 How did you first hear that other people in
 23 your grade or at school were going to Mr. Epstein's
 24 home? Who did you hear that from?
 25 A. I mean I just remember the first time I heard

1 about it wa [REDACTED] asking me to go. And then after that,
 2 I just remember Jane Doe 4 talking about it and then
 3 [REDACTED]
 4 Q. And you said [REDACTED] asked you to go. And at
 5 that time I think you said it was, you remembered it
 6 being in gym class or something like that.
 7 A. Yes.
 8 Q. And [REDACTED] was in your grade?
 9 A. She was a grade ahead of me, but anybody could
 10 have gym together.
 11 Q. So what specifically did [REDACTED] say to you, your
 12 best recollection?
 13 A. She asked me if, if I needed a job and if I
 14 needed money, and then she asked me if I knew how to
 15 give a massage. And I said yes, but not professionally.
 16 And she told me that was fine.
 17 And then she told me how she knows a guy that
 18 lives in Palm Beach and will pay me if I give a massage.
 19 Q. You had been to Palm Beach before?
 20 A. Yes.
 21 Q. And I assume based on what you told me earlier
 22 you had been to the beach in Palm Beach?
 23 A. Yes.
 24 Q. And had your dad driven you over there in Palm
 25 Beach because this is where I work, this is the kind of

1 houses I inspect?
 2 A. He works like downtown. He doesn't work like
 3 on Palm Beach island.
 4 Q. Where does he work when you say downtown, West
 5 Palm? That's where his office is?
 6 A. Yeah, West Palm.
 7 Q. Okay. Had he ever driven you over there?
 8 A. I mean yeah, he's driven over there to go to
 9 the beach and stuff.
 10 Q. Had you walked up and down at times, you and
 11 your mom at times walked up and down Worth Avenue and
 12 then gone over to the beach just to look?
 13 A. I mean yeah, I guess.
 14 Q. It's a tourist spot?
 15 A. Yes, I've been to Worth Avenue before.
 16 Q. All right. So you were familiar with Palm
 17 Beach before [REDACTED] said -- so when she said there is a
 18 guy over in Palm Beach, you knew where Palm Beach was
 19 and you had been on the island before, correct?
 20 A. Yes.
 21 Q. And did she tell you how old the person was,
 22 how old this guy was?
 23 A. No.
 24 Q. She didn't tell you whether he was 20 years
 25 old or 50 years old or 100 years old?

1 A. No.
 2 Q. All right. She just said "If you want a job,
 3 you want to make some money, you have to give a
 4 massage."
 5 You said, "I'm not a professional, but I've
 6 given massages before"?
 7 A. Yes.
 8 Q. Who had you ever given a massage to?
 9 A. I don't remember, just girlfriends mainly,
 10 like back massages.
 11 Q. So did you ask [REDACTED] when she said, you know,
 12 you can make some money, did she tell you how much you
 13 could make?
 14 A. Yeah, I think she said \$200.
 15 Q. And did she say whether she was going to make
 16 any money?
 17 A. No.
 18 Q. And did you say okay, did you say "Yeah, I'm
 19 interested"; or "No, I'm not interested, let me think
 20 about it"?
 21 A. I told her I was interested.
 22 Q. Why were you interested in any way -- well,
 23 let me ask you this. Did you say "Well, where exactly
 24 is the massage going take place?"
 25 A. I didn't ask her any of the details. I just

1 was interested in making money, I guess [REDACTED]
 2 Q. So when is the next time you and [REDACTED] had some
 3 conversation about it?
 4 A. The next time is she just, I'm pretty sure
 5 like when I actually went there.
 6 Q. Did she say at school, "Hey, we're going to go
 7 on Tuesday" or whatever?
 8 A. I don't remember.
 9 Q. On any of the times that you ever went to
 10 Mr. Epstein's, did you ever miss school to go?
 11 A. I went on -- no, I usually went after school.
 12 Q. What time? What time did you get out of
 13 school, like two, three o'clock?
 14 A. Yes.
 15 Q. So you would go after you got out of school?
 16 A. Yes.
 17 Q. And on the first occasion, how did you know
 18 that you were going to go a particular day?
 19 A. [REDACTED] told me. I guess she made plans with
 20 Sarah or Jeffrey.
 21 Q. Tell me what you know, not what you guess. So
 22 let me ask you again. What did [REDACTED] say to you?
 23 A. I don't remember exactly. I just remember her
 24 asking me, and then I forget how we actually, when we
 25 made plans to go there, like what day, but -- and then I

1 remember us going there.
 2 Q. As [REDACTED] drove?
 3 A. Yes.
 4 Q. What did she have at the time? Did she have a
 5 car, a truck, SUV?
 6 A. She had a truck.
 7 Q. What did it look like, do you remember?
 8 A. Maroon.
 9 Q. Maroon, all right. Now before you went, did
 10 you talk with her again and say "Okay, what am I
 11 supposed to wear?"
 12 A. No. That first conversation, she just told me
 13 to dress cute.
 14 Q. Dress cute?
 15 A. Yeah.
 16 Q. What's that mean to you or what did that mean
 17 to you?
 18 A. I don't know. I just wore like my bathing
 19 suit, because she said -- like we were planning on going
 20 to the beach after. And then I wore a skirt and a tank
 21 top?
 22 Q. So you wore a bathing suit, tank top, skirt
 23 and like flip-flops?
 24 A. Uh huh.
 25 Q. Yes?

1 A. Yes.
 2 Q. What did you anticipate, and their arms and
 3 their hands and their feet, necks, their head sometimes?
 4 A. What did I anticipate I was going to do?
 5 Q. All right. If you -- had you seen that on TV?
 6 A. I mean yeah, I guess.
 7 Q. Okay. So if you had seen that on TV, did you
 8 assume that when you went over to earn money to do a
 9 massage and you weren't, as you said, you weren't a
 10 professional, that you were going to give some guy a
 11 massage, so you would be massaging basically a large
 12 part of his body?
 13 A. Yes.
 14 Q. And you understood, or I assume from having
 15 seen it on TV, you understood that people who have
 16 massages, males or females, oftentimes they are on
 17 either their back or their stomach and then their
 18 private parts are covered only with a towel, but they
 19 are naked underneath?
 20 A. Yes.
 21 Q. All right. Now, so you are going over there,
 22 at least [REDACTED] tells you you are going to get 200 bucks
 23 for giving a massage for a guy, so you knew it was a
 24 male.
 25 Did you ask her at the time how old is this

1 A. Yes.
 2 Q. Did you say "Wait a minute, why do I have
 3 to -- even if we're going to the beach afterwards, why
 4 do I have to dress cute for this massage?"
 5 A. I don't, I don't really remember. I was
 6 confused.
 7 Q. What's confusing about that?
 8 A. I, she could have meant like dress, you know,
 9 professionally, like massage people dress cute, I don't
 10 know. I was like 16. I don't remember.
 11 Q. Okay. Where had you ever seen -- had you ever
 12 had a massage yourself?
 13 A. No.
 14 Q. Had you ever been to a spa?
 15 A. No. I have seen spas before. I have never
 16 actually been.
 17 Q. Had you ever seen anyone have a professional
 18 massage?
 19 A. Yeah, like on TV I have seen people. Not like
 20 in person, but I have known the --
 21 Q. And do you know when you give someone a
 22 massage, that is a professional massage, you are
 23 massaging their legs and their thighs and their back and
 24 their neck, and then they flip over and you do the front
 25 of their legs, things like that?

1 person?
 2 A. No.
 3 Q. Why not?
 4 A. I just, I didn't think about it. I remember
 5 asking her like why he doesn't just hire somebody to
 6 give him a massage, and she told me he doesn't like
 7 professional people, like professional massages.
 8 Q. Okay. As you described yourself earlier, you
 9 said you are of above average intelligence, so did you
 10 say to her at that time wait a minute, why doesn't --
 11 you had certainly the common sense to say why doesn't he
 12 hire a professional masseuse, and she said well, he
 13 doesn't like those.
 14 Did that send off a little bell in your head
 15 to go gee, why am I going and getting paid \$200 versus a
 16 professional messenger, masseuse?
 17 MR. HOROWITZ: Form.
 18 THE WITNESS: I mean I didn't know. I didn't
 19 really think about it.
 20 BY MR. CRITTON:
 21 Q. You thought about it enough to ask why doesn't
 22 he get a professional, right?
 23 A. Yeah.
 24 Q. Did you say okay -- I assume when you have
 25 seen people on TV give massages, you have seen they have

1 been in basically in uniform, sometimes they are in a
2 white uniform or may have a polo shirt on and pants or
3 shorts, right?

4 MR. HOROWITZ: Form.

5 THE WITNESS: Yes.

6 BY MR. CRITTON:

7 Q. Have you ever seen people again separate and
8 about from -- well, let me strike that.

9 Have you ever seen people give massages in the
10 movies, other than when a guy is giving a girl a massage
11 that they have a relationship, where someone shows up in
12 a swimsuit or a cute little tank top and a skirt?

13 MR. HOROWITZ: Form.

14 THE WITNESS: No.

15 BY MR. CRITTON:

16 Q. All right. So [redacted] tells you to dress cute.
17 You are going to give a guy who doesn't want
18 professional massage a massage, and you are not a
19 masseuse, right?

20 A. Yes.

21 Q. And you didn't ask how old he is, correct?

22 A. Correct.

23 Q. Okay. Did you ask who was going to be there?

24 A. No.

25 Q. Did you ask where it's going to be done?

1 A. I think she might have said that.

2 Q. Did she, did you express any concern, like is
3 this guy going to be pushy? Is he nice? Is he an angry
4 kind of person? You know, is he going to be physical
5 with me or verbally abusive in any way?

6 Did you ask any of those questions?

7 A. No.

8 Q. Did she say anything when you said -- I said
9 did she say anything about that she he was nice and you
10 wouldn't have to worry, and you said you remember her
11 saying something about him being nice, right?

12 A. Yes.

13 Q. Okay. Did she say that he wouldn't use any
14 physical force or violence or any kind of coercion, that
15 you could feel safe?

16 MR. HOROWITZ: Form.

17 THE WITNESS: I mean she never said it that
18 way.

19 BY MR. CRITTON:

20 Q. Did you assume that?

21 A. When she said he was nice and she's already
22 done it, I assumed it.

23 Q. Okay. Did she tell you if he, if you are
24 asked your age, to say you are over 18?

25 A. No.

1 A. Yes.

2 Q. And she said?

3 A. At his house.

4 Q. Okay. Did you say "Why are we doing it at his
5 house?"

6 A. I don't remember.

7 Q. Did you say "Where are you going to do it in
8 the house?"

9 A. I don't remember.

10 Q. Did you ask her "Am I going to [redacted], are
11 you going to be there too?"

12 A. She was the one that was bringing me, so yeah,
13 I obviously assumed she was going to be there.

14 Q. So you assumed she was going to be there. So
15 what, did you say "What parts of his body do I have to
16 massage?"

17 A. Uh uh, I didn't ask. She told me like --

18 Q. Go ahead.

19 A. She told me his legs and his feet is what she
20 usually does, but I then never asked her really.

21 Q. Okay. Do you remember [redacted] telling you that,
22 in fact, it was an older man, late forties, fifties?

23 A. No.

24 Q. Do you remember her telling you he was a nice
25 guy?

1 Q. So if [redacted] says that's what she told you, that
2 would not be true or you just don't remember?

3 A. No, that would be a lie.

4 Q. Kind of like what you told the Palm Beach
5 police?

6 MR. HOROWITZ: Form, argumentative.

7 BY MR. CRITTON:

8 Q. Right?

9 A. I guess you would say that.

10 Q. Did she ever say anything that you might be
11 asked to remove your clothes or take off an article of
12 clothing?

13 A. No, not the first time I went.

14 Q. Did she ever give you any indication that you
15 should be -- well, let me strike that.

16 Okay, so she makes an arrangement for a time.
17 You don't know how, but she tells you we're going over
18 there at such and such a time, dress cute, right?

19 A. Uh huh.

20 Q. Yes?

21 A. Yes.

22 Q. She picks you up?

23 A. I don't -- we might have left after school.

24 Q. So you might have left right from school?

25 A. Yes.

1 Q. Did you just take clothes with you from
 2 school?
 3 A. Well, we were going to the beach after, so I
 4 probably, I remember wearing my bathing suit.
 5 Q. Did you in fact go to the beach afterwards?
 6 A. Yes.
 7 Q. In Palm Beach?
 8 A. Yes.
 9 Q. All right. So do you remember what time of
 10 year it was now? In thinking of that, it had to have
 11 been warm if you were going to the beach or at least
 12 decent.
 13 A. Yes.
 14 Q. And it was just the two of you?
 15 A. Yes.
 16 Q. On the way over there, did you discuss what
 17 you were going to be doing? Were you nervous at all?
 18 A. I mean I was a little bit nervous, but I -- we
 19 didn't really talk about what we were going to be doing.
 20 Q. So you got to the house. Did she park on the
 21 driveway or on the street?
 22 A. The driveway.
 23 Q. When you got out of the car, did you say to
 24 [redacted] at any time before you got out of the car, "You
 25 know, this doesn't seem like a great idea, I think I

1 A. I think so. I don't remember what I ate. I
 2 remember the cook like offering food. He was cooking.
 3 Q. And [redacted] went upstairs. Did Mr. Epstein come
 4 down?
 5 A. No, I think she just came back down and told
 6 me to go upstairs.
 7 Q. Told you to go upstairs?
 8 A. Yes.
 9 Q. The first time that you went to the Epstein
 10 home, did you actually go up or did only [redacted] go up?
 11 A. I remember I went once with [redacted] when she just
 12 went up.
 13 Q. Was that the first time?
 14 A. Yes, I think that was the first time.
 15 Q. So the first time you were there --
 16 A. Or actually -- I don't remember correctly.
 17 Q. Okay.
 18 A. I don't, I remember just going once with her
 19 when she did her massage. And then --
 20 Q. She meaning [redacted]
 21 A. Yes. So yeah, I remember the first time I
 22 went there to do it.
 23 Q. Did [redacted] tell you she had been there before?
 24 A. Yes.
 25 Q. Okay. So at least one time you went with [redacted]

1 don't want to do it"?
 2 A. I mean no. When I got there, I was kind of
 3 confused by everything, but I didn't really say that to
 4 her.
 5 Q. Why not?
 6 A. I mean I didn't know what was going to go on.
 7 Q. Well, you could have at that time turned
 8 around and said, "You know, [redacted], I don't really feel
 9 like doing this," right?
 10 A. Yes.
 11 Q. So you had to -- again, it was your decision.
 12 You could either say yes or no, and you said yes, I'm
 13 going to go into the house, right?
 14 A. Yes. I mean the first time she didn't tell me
 15 what was going on at all, so --
 16 Q. You go in the house. Was anybody there?
 17 A. There was a cook there and [redacted]
 18 Q. And you were in the kitchen?
 19 A. Yes.
 20 Q. And what happened then?
 21 A. They just like offered me food and water and
 22 [redacted] introduced herself to me. And she went up and got
 23 Jeffrey.
 24 Q. Okay. Did you eat anything when you were
 25 there?

1 where she went up and gave the massage and you just sat
 2 in the kitchen?
 3 A. Yes.
 4 Q. Do you remember that being the first time or
 5 another time?
 6 A. I think it was -- no, it was the second time,
 7 because I didn't know the first time what --
 8 Q. Okay. So the first time [redacted] came back down
 9 and she said you can go upstairs?
 10 A. Yes.
 11 Q. Did she take you upstairs?
 12 A. Yeah, she walked up there with me.
 13 Q. So you followed her?
 14 A. Yes.
 15 Q. Did you go up a stairway, I assume?
 16 A. Stairway, yeah.
 17 Q. Anything unusual about the stairway?
 18 A. There were just like weird pictures like on
 19 the side of the wall.
 20 Q. Of what?
 21 A. They were pictures of like girls, pictures of
 22 boobs, pictures of like weird drawings.
 23 Q. Arts kind of pictures?
 24 A. Arts, but then there was some kind of weird
 25 pictures of girls with boobs and naked pictures.

17 (Pages 359 to 362)

1 Q. Describe -- you said there were some art
 2 pictures on the wall that had what, naked people or
 3 portions of torsos or something?
 4 A. Yeah.
 5 Q. And then you saw a picture of -- another
 6 picture where women were, didn't have tops on?
 7 A. And I saw a picture of a little girl.
 8 Q. Okay. And how was she dressed?
 9 A. She had like a dress on.
 10 Q. All right.
 11 A. I think that was his daughter that I saw there
 12 before.
 13 And then I walked into the room and there were
 14 more pictures there of girls and weird art pictures.
 15 Q. Again, just, you say weird art pictures,
 16 just --
 17 A. Just I don't know, weird torso and boob
 18 pictures, I guess.
 19 Q. Of different parts of bodies, pictures?
 20 A. Yes.
 21 Q. And there were other pictures of girls?
 22 A. Yes.
 23 Q. Anyone that you recognized?
 24 A. No.
 25 Q. Anyone that you had ever seen at the house?

1 A. Yes.
 2 Q. Did she tell you what you were supposed to do
 3 or what you were supposed to use or anything like that?
 4 A. She said there was like massage oil, and she
 5 like pointed to the massage oil. And that's all I think
 6 I can remember her saying.
 7 Q. Were you nervous at all?
 8 A. Yes.
 9 Q. Did you say to [REDACTED] "You know what, I don't
 10 think I want to do this, I think I'm out of here"?
 11 A. I felt like I was kind of pressured and put in
 12 a weird position where I just felt like I kind of had to
 13 do it because I was already there.
 14 Q. Because [REDACTED] had put you in that position?
 15 A. I mean --
 16 MR. HOROWITZ: Form.
 17 THE WITNESS: Well, Jeffrey walked in.
 18 BY MR. CRITTON:
 19 Q. No, before Jeffrey got there.
 20 A. Well, not just because of [REDACTED] no. Just in
 21 general, I already said I would do it.
 22 Q. Because you committed kind of?
 23 A. Yes.
 24 Q. So you felt that you -- well, all right. So
 25 you got up there, she shows you the lotions. Does [REDACTED]

1 A. I don't think so.
 2 Q. Were they clothed or unclothed?
 3 A. I think they were undressed.
 4 Q. Completely or just tops?
 5 A. I remember their breasts were showing.
 6 Q. That's what you remember seeing?
 7 A. Yes.
 8 Q. And you don't know who they were?
 9 A. No.
 10 Q. Or how old they were?
 11 A. No.
 12 Q. Did they appear to be adults to you?
 13 A. They could have been.
 14 Q. So then you go in [REDACTED] walks you into a
 15 room?
 16 A. Yes.
 17 Q. And what's there?
 18 A. There was a shower, like a vanity, the massage
 19 table. She like already had it set up.
 20 Q. Had you ever seen a massage table before?
 21 A. Just not -- I mean in movies.
 22 Q. Movies again. Did she say anything to you?
 23 A. She just said that Jeffrey would be in
 24 shortly.
 25 Q. And did she leave then?

1 leave before Jeffrey comes into the room?
 2 A. I think so, yes.
 3 Q. Okay. So you are what, just standing by the
 4 table?
 5 A. Yeah.
 6 Q. And what happens?
 7 A. And then Jeffrey comes in.
 8 Q. And what's he do? How is he dressed?
 9 A. I think he just had a towel around him.
 10 Q. Okay. What color was the towel?
 11 A. White.
 12 Q. And describe it.
 13 A. He just had it like around his waist.
 14 Q. Describe Mr. Epstein.
 15 A. Like his body?
 16 Q. Yes. Tall, short?
 17 A. He's a taller guy, has gray hair, kind of
 18 hairy, kind of bigger, not fat, but like bigger build,
 19 blue eyes, like a longer face.
 20 Q. All right. Did he introduce himself?
 21 A. Yes.
 22 Q. What did he say?
 23 A. Just said "Hi, I'm Jeffrey."
 24 Q. And you said?
 25 A. I said, "Hi, I'm Jane Doe 7, [REDACTED] s friend."

1 Q. Did you shake hands?
 2 A. I think so.
 3 Q. And what did he do?
 4 A. And then that's when he got on the massage
 5 table and he, that's when basically like the first time
 6 I gave a massage and he said that he would like his feet
 7 and his calves massaged, and he was turned over.
 8 Q. So he was on his back. How long did the
 9 session last?
 10 A. It lasted for about, about half an hour, I
 11 think.
 12 Q. About 30 minutes?
 13 A. Yes.
 14 Q. All right. And did you massage his feet?
 15 A. Yes.
 16 Q. Did you pick the oil that you were going to
 17 use?
 18 A. Yes.
 19 Q. Had you ever used massage oil before?
 20 A. No.
 21 Q. How did you know which one to pick, just from
 22 what [REDACTED] told you?
 23 A. Yes.
 24 Q. So you used the massage oil. You did his
 25 calves and his feet?

1 Q. Next to his right arm?
 2 A. Well, I mean if you are looking at him this
 3 way, I was over here.
 4 Q. Well, you say he was lying down, so as he was
 5 lying down, were you near his right shoulder or his left
 6 shoulder?
 7 A. When he was lying down, I was near his left
 8 shoulder.
 9 Q. As you were massaging his chest --
 10 MR. HOROWITZ: You mean lying down on his back
 11 or his stomach?
 12 BY MR. CRITTON:
 13 Q. You said he was lying on his back?
 14 A. Yes.
 15 Q. So you were near his right shoulder?
 16 A. His left shoulder.
 17 Q. His left shoulder, all right. And were you
 18 standing at his side or were you standing at the top of
 19 his head, massaging his chest?
 20 A. On the side.
 21 Q. All right. And you say you heard a humming
 22 and then what happened?
 23 A. And then he just started reaching under his
 24 towel and then he kind of like grabbed, he grabbed me
 25 towards him and pulled me towards him.

1 A. Yes.
 2 Q. Did he turn over then?
 3 A. Towards the end, yes.
 4 Q. So after what, you are 90 percent done, then
 5 he turned over?
 6 A. Yeah.
 7 Q. Okay. And he had a towel over him the entire
 8 time?
 9 A. Yes.
 10 Q. Okay. And when he turned over, what did
 11 you -- did you continue the massage?
 12 A. He turned over and then he asked me if I could
 13 like massage his chest.
 14 Q. And did you?
 15 A. Yes.
 16 Q. All right. And then what?
 17 A. And then I was massaging his chest, and I
 18 don't know, he started making noises.
 19 Q. Like what?
 20 A. Just like humming noises.
 21 Q. Humming?
 22 A. Yeah. Just, I don't know, weird noises. And
 23 then --
 24 Q. Were you standing to his left or his right?
 25 A. I was standing on his right.

1 Q. Where did he grab you?
 2 A. He grabbed my buttocks and pulled me to him.
 3 Q. When you say grabbed you, he put his hand
 4 behind your buttocks and pulled you toward him?
 5 A. Yes.
 6 Q. Which hand?
 7 A. His left hand.
 8 Q. When he did that, what did you do?
 9 A. Felt really awkward and got really scared. I
 10 think he could tell I was scared. And I got nervous and
 11 he, he kind of asked me if I was okay.
 12 And I just told him I felt, I felt nervous.
 13 And that's, that's when he like started to masturbate,
 14 and that's when --
 15 Q. How do you know he was masturbating?
 16 A. Because I could, I could tell.
 17 Q. Had you ever seen a guy masturbate before?
 18 A. Yes.
 19 Q. Where?
 20 A. Like on TV.
 21 Q. On what, like a porno movie or something like
 22 that?
 23 A. I don't know, I knew what it was.
 24 Q. Everybody learns about it at some point in sex
 25 education, right, male and female masturbation, right?

1 A. Yes.
 2 Q. All right. It's part of life. You had seen
 3 it on TV before? Yes?
 4 A. Yes.
 5 Q. Had you seen it in the movies before?
 6 A. Yes.
 7 Q. All right. Had you ever seen it in person
 8 before?
 9 A. No.
 10 Q. All right. So you figured that's what he was
 11 doing under the towel, right?
 12 A. Yes.
 13 Q. All right. You didn't see it, you just
 14 assumed that's what was going on?
 15 MR. HOROWITZ: Form.
 16 THE WITNESS: Yes.
 17 BY MR. CRITTON:
 18 Q. All right. So had he let go of you then? He
 19 put his hand on your butt and pulled you toward him,
 20 when you said you felt awkward, scared and nervous and
 21 he sensed that and you said "I'm nervous," did he let go
 22 of you?
 23 A. No.
 24 Q. Okay. Did he continue to hold on to your
 25 butt?

1 A. Yes.
 2 Q. Did you ever -- had you removed any clothing?
 3 A. No.
 4 Q. Had he ever asked you to remove any clothing?
 5 A. I think the first time, I felt so like nervous
 6 and awkward, I don't think he asked me, no.
 7 Q. Well, all right. So your best recollection is
 8 he didn't ask you to take any of your clothes off?
 9 A. The first time.
 10 Q. So he pulled you towards him. You felt
 11 awkward, scared and nervous, right?
 12 A. Uh huh.
 13 Q. You told him -- yes?
 14 A. Yes.
 15 Q. And you told him that?
 16 A. Yes.
 17 Q. Okay. And then he was, from your perspective,
 18 was masturbating under the towel?
 19 A. Yes.
 20 Q. And then what happened?
 21 A. And then he was just making noises. And I
 22 didn't see him ejaculate, but I'm assuming he
 23 ejaculated, because he stopped. And then that was --
 24 Q. That was it?
 25 A. Yes.

1 Q. Okay. Did he get up then?
 2 A. Yes.
 3 Q. Keep the towel around him?
 4 A. I know he like put on, grabbed a new towel,
 5 and then I walked around the side and he got his money
 6 and gave me the \$200.
 7 And then he asked me for my number. And he
 8 told me if I had a friend, asked me if I had a friend
 9 that wanted to make money.
 10 Q. And you said? So he asked you for your number
 11 and said if you had a friend who would like come --
 12 A. Yes.
 13 Q. What?
 14 A. He said if I brought a friend, then I would
 15 make money.
 16 Q. Okay. And he gave you \$200. You felt
 17 awkward, scared and nervous.
 18 Did you give him your phone number or did you
 19 give him just a fake phone number?
 20 A. I gave him mine.
 21 Q. But you could have said "No, thanks, I'm done,
 22 I'm not going to give you my phone number," right?
 23 A. Yes. I just felt scared and intimidated, so I
 24 gave him my number.
 25 Q. But you could have given him any phone number,

1 true?
 2 A. Umm, I suppose.
 3 Q. Okay. Did you feel intimidated?
 4 A. Yes.
 5 Q. Did you feel uncomfortable?
 6 A. Yes.
 7 Q. Did you feel in any way embarrassed or
 8 humiliated?
 9 A. I was kind of confused. Like he was like an
 10 older, powerful man and, you know, I just felt confused
 11 about the whole situation at that point.
 12 MR. CRITTON: Okay. Let's take a break.
 13 THE VIDEOGRAPHER: Going off the record at
 14 5:28 p.m. This marks the end of tape three.
 15 (Discussion held off the record.)
 16 THE VIDEOGRAPHER: We are back on the record
 17 at 5:31 p.m. This marks the beginning of tape
 18 four.
 19 BY MR. CRITTON:
 20 Q. You said that you thought Mr. Epstein -- did
 21 you know what his last name was at that time or you just
 22 knew his name was Jeffrey?
 23 A. I think I knew, just thought it was Jeffrey.
 24 Q. You said when he walked in the room, obviously
 25 you knew that he was, you know what his approximate age

1 was?
 2 A. He looked older, yes.
 3 Q. All right. When you say older, how old does
 4 that mean?
 5 A. He looked like he was like 45, 50.
 6 Q. You said he was powerful. What made you think
 7 he was powerful?
 8 A. I could just tell by his house.
 9 Q. Just because he had a big house?
 10 A. Yes.
 11 Q. Did you know anything about him?
 12 A. No.
 13 Q. During the eight to ten times you claim that
 14 you went, did you ever learn anything about him, what he
 15 did for a living?
 16 A. Yes, I think he told somebody --
 17 Q. No, what he told you, not somebody.
 18 MR. HOROWITZ: No, no, that's how she learned.
 19 She is explaining to you.
 20 BY MR. CRITTON:
 21 Q. Let me stick with my question. Did you ever
 22 learn from him what he did?
 23 A. No, he would talk about his friends in finance
 24 and he would be on phone calls sometimes when I was like
 25 giving him massages.

1 And then he talked to me about how his friends
 2 like own yachts and, you know sail, because I told him I
 3 wanted to get into hospitality and travel. So he told
 4 me about his friends, and he said he would introduce me
 5 to one of his friends if I wanted to, because his friend
 6 has like a yacht, and I could work on his yacht and just
 7 stuff like that. So I just kind of assumed things.
 8 Q. The friends, did he ever tell you who his
 9 friends were?
 10 A. I saw pictures of like Bill Clinton, I think,
 11 and I saw a picture with Donald Trump. He never told me
 12 who they were.
 13 Q. He just said he had friends?
 14 A. Yes.
 15 Q. And you saw some pictures?
 16 A. Yes.
 17 Q. And you don't know whether those people were
 18 his friends or not, you just know that you saw pictures
 19 with those people?
 20 A. I mean he had his arm around them and they
 21 looked like they were friends.
 22 Q. So Mr. Epstein was in the picture, one picture
 23 with Trump, another picture with Clinton?
 24 A. Yes.
 25 Q. When he gave you the \$200, did he give you any

1 money for [REDACTED].?
 2 A. No.
 3 Q. Did you -- well, let me strike that. He gave
 4 you \$200, he asked for your phone number and you
 5 voluntarily gave it to him, correct?
 6 A. Yes.
 7 Q. He asked you if you ever wanted to bring
 8 someone else that wanted to come, he'd pay you to do
 9 that?
 10 A. Yes.
 11 Q. Did he tell you how much he'd pay you to do
 12 that?
 13 A. 200.
 14 Q. And I think you described yourself at that
 15 point as awkward, you felt the situation was awkward,
 16 scared, I think you used the word weird, you thought it
 17 was inappropriate and you felt uncomfortable. Fair?
 18 MR. HOROWITZ: Form.
 19 THE WITNESS: Yeah.
 20 MR. HOROWITZ: Confused too.
 21 BY MR. CRITTON:
 22 Q. Let's put confused there too. I'll add that.
 23 So as you left, you gave him your phone
 24 number, you listened to what he said about bringing
 25 somebody else, and what happened then? Did he go off?

1 A. Yeah, I just left with [REDACTED].
 2 Q. No, no, did he go off before you went back
 3 downstairs?
 4 A. Like walked off?
 5 Q. Did he leave the room?
 6 A. I think he just walked me to the stairs.
 7 Q. And he still had a towel around him?
 8 A. I think so, yeah, or a robe maybe.
 9 Q. You never saw him completely naked that day,
 10 did you?
 11 A. No.
 12 Q. Then he walked you to the stairs, you went
 13 back down the stairs [REDACTED] was still there?
 14 A. Yes.
 15 Q. And did you have anything to eat or drink
 16 before you left?
 17 A. No.
 18 Q. Did you see [REDACTED] again?
 19 A. Yeah, I saw her when I was leaving.
 20 Q. Did she say anything to you?
 21 A. Just goodbye, I think. Something like that.
 22 Q. And what did you say?
 23 A. Just said bye. Just wanted to get out of
 24 there.
 25 Q. You wanted to get out of there because you

1 thought it was a really weird situation; fair statement?
 2 A. Yes.
 3 Q. And you were very uncomfortable and scared and
 4 nervous, true?
 5 MR. HOROWITZ: Form.
 6 THE WITNESS: I mean yeah, I was confused by
 7 everything. I saw like a rich, powerful guy, and
 8 then he was, you know, and very nice to me, but at
 9 the same time like I, you know, felt uneasy and
 10 just confused by everything that was going on.
 11 BY MR. CRITTON:
 12 Q. Had you ever been with a guy before, a male
 13 before where he had masturbated, even if you didn't see
 14 it?
 15 A. No.
 16 Q. Had you ever been with one of your, a guy
 17 friend and the guy had masturbated?
 18 A. No.
 19 Q. Or you thought he was masturbating?
 20 A. No.
 21 Q. You both leave the kitchen, you leave the
 22 house, you get back in the truck.
 23 A. (Witness nods head up and down.)
 24 Q. Do you start screaming a [REDACTED] going "What in
 25 God's name did you get me into here [REDACTED]?"

1 A. Yeah.
 2 Q. All right. You just went to that beach,
 3 parked at the meters, and just went down to the beach
 4 for a while?
 5 A. Yes.
 6 Q. And then to get home from there, what is it,
 7 about a 30-minute ride?
 8 A. Yes.
 9 Q. So you and [REDACTED] go to the beach for a period
 10 of time and you ride home. Were you aware whether [REDACTED]
 11 had received any money at that point?
 12 A. I don't remember.
 13 Q. Did you learn later that H.R. had received
 14 money?
 15 A. Yes.
 16 Q. Did she tell you?
 17 A. I don't remember if she told me. I think she
 18 did.
 19 Q. Did she tell you how much money she received?
 20 A. I think just 200, like he pays everybody.
 21 Q. And were you offended that she had received
 22 \$200 for bringing you?
 23 A. I don't remember what I thought back then.
 24 Q. Did, when you were on the beach or on the way
 25 home, so there had to have been at least 30 minutes plus

1 A. Actually, I was just like really embarrassed
 2 about everything, and I forget my conversation with her
 3 that day, though.
 4 Q. Well, did you say to her -- did she say
 5 anything to you like "Well, everything go okay?"
 6 A. No.
 7 Q. So how far -- did she take you home or did you
 8 guys go to the beach?
 9 A. I believe we went to the beach after that.
 10 Q. How long did you stay at the beach?
 11 A. I don't remember.
 12 Q. An hour, ten minutes, five minutes?
 13 A. I have no idea.
 14 Q. Did you go in the ocean?
 15 A. I don't remember. I just remember we went to
 16 the beach after that.
 17 Q. And then you went home. Did she drive you
 18 home?
 19 A. Yes.
 20 Q. What's it from Palm Beach to the beach -- did
 21 you go to the beach off of Worth Avenue, that area?
 22 A. Just when you keep driving straight down
 23 Okeechobee to -- yeah, the one straight, all the way
 24 down.
 25 Q. The end on Royal Palm Way?

1 the time you rode from Mr. Epstein's house to the beach,
 2 sat there a while, 45 minutes, an hour, maybe longer,
 3 did you ever, did [REDACTED] ever ask you what had happened or
 4 if you were okay, what had happened?
 5 A. I don't remember. It was seven years ago. I
 6 don't remember what we talked about.
 7 Q. Well, depending on the time period, maybe five
 8 years ago.
 9 A. Five.
 10 Q. Maybe six years ago, maybe seven years, I'm
 11 not sure, based on your earlier testimony.
 12 So you were with [REDACTED]. Did you express any
 13 anger --
 14 A. I'm mean I'm sure I was angry --
 15 Q. Let me finish the question. Did you express
 16 any anger or anxiety to her with regard to what had
 17 occurred between you and Mr. Epstein?
 18 A. I mean I'm sure she could tell I was
 19 uncomfortable and upset because of what happened, but I
 20 don't remember what I said to her, what she said to me
 21 exactly.
 22 Q. Why would she notice that you were upset?
 23 A. Because she didn't tell me everything that was
 24 going to go on, so of course I would have been upset.
 25 Q. Why? How would she know that you were upset

1 if you didn't express it?
 2 A. I don't remember if I said something about
 3 her -- I mean I'm sure I did say something like why
 4 didn't you tell me the whole story or something like
 5 that, but I don't --
 6 Q. Did you feel that you had been misled?
 7 A. Yes.
 8 Q. Did you feel that [REDACTED] had deceived you?
 9 A. Yes.
 10 Q. Did you feel that she had misrepresented the
 11 circumstances of you giving the massage?
 12 A. Yes.
 13 Q. Did you feel she had lied to you?
 14 A. I just felt like she didn't tell me everything
 15 that was going to go on.
 16 Q. All right. So did you express something like
 17 that to her?
 18 A. I'm sure I did. I just don't remember exactly
 19 what I said.
 20 Q. Okay. And did you tell her, do you remember
 21 telling her you felt the situation was awkward, you were
 22 scared, you were nervous, you were confused, you were
 23 uneasy, you thought that his actions were inappropriate,
 24 you felt uncomfortable?
 25 Did you tell her all that?

1 deceived you and misrepresented what was going to occur,
 2 why didn't you then at that point say no way under God's
 3 green earth am I going back to Mr. Epstein's house again
 4 under any circumstances?
 5 A. Just because I was young and I wasn't thinking
 6 and I was just confused, and I heard my friends started
 7 going there and then, you know, waited a little bit.
 8 And I mean, I don't know, I just wasn't in the right
 9 mindset. I was --
 10 Q. Well, you knew that he couldn't force you to
 11 go back, right?
 12 A. Yes.
 13 Q. And you knew he had no power over you? Once
 14 you left that house, from your perspective, you were no
 15 longer committed to anything, you never had to go back,
 16 you never had to go back to Mr. Epstein's house for any
 17 reason under any circumstances, did you?
 18 A. No.
 19 Q. Okay. And you could have said I found what I
 20 did inappropriate, I'm embarrassed, I'm humiliated about
 21 going, I'm not going back?
 22 MR. HOROWITZ: Form.
 23 BY MR. CRITTON:
 24 Q. You could have made that decision right then
 25 and there on the beach with [REDACTED] that day, right?

1 MR. HOROWITZ: Form.
 2 BY MR. CRITTON:
 3 Q. Or something like that?
 4 A. I'm sure I did. I don't remember exactly what
 5 I told her.
 6 Q. All right. So at that point, that is, after
 7 that, describe that as a pretty miserable experience for
 8 you yourself?
 9 A. Yes.
 10 Q. So this miserable experience having occurred,
 11 I assume you made a decision right then and there that
 12 you would never go back to Mr. Epstein's house, because
 13 why would you put yourself in such a situation which was
 14 awkward, where you would be weird, you would be scared,
 15 nervous, anxious, and what he did from your view was
 16 inappropriate and uncomfortable for you?
 17 MR. HOROWITZ: Form.
 18 THE WITNESS: Well, you know I went eight to
 19 ten times, so obviously you know I went back after
 20 that.
 21 BY MR. CRITTON:
 22 Q. That's my question to you, was if you found
 23 the situation awkward, weird, you were scared, nervous,
 24 you felt what he did was inappropriate and you were
 25 uncomfortable and confused and you felt that [REDACTED] had

1 A. Yes.
 2 Q. All right. And you felt embarrassed and
 3 humiliated, didn't you?
 4 MR. HOROWITZ: Form.
 5 THE WITNESS: Yes.
 6 BY MR. CRITTON:
 7 Q. All right. Did you think it was kind of
 8 traumatic what he had done? You had never seen a guy or
 9 you had never been in the presence where another male
 10 had masturbated. Even though you didn't see him, that's
 11 what you thought he was doing, right?
 12 A. Yes.
 13 Q. All right. And that you found completely
 14 inappropriate, right?
 15 A. I mean yes. I was just confused at the time.
 16 Q. What's there to be confused about? You came
 17 away from that experience having been embarrassed and
 18 humiliated. You felt the situation was inappropriate.
 19 You were uncomfortable, scared and nervous.
 20 What would you ever be thinking why you would
 21 have any interest in going back to Mr. Epstein's after
 22 that occasion?
 23 A. Well, I wasn't planning on going back for a
 24 little while. And then I just heard girls started going
 25 and [REDACTED] called me and asked me if I wanted to bring

1 anybody, and then other girls started going, and that's
 2 when I believe [REDACTED] asked me about it or [REDACTED] one of
 3 them. And that's when I took one of those girls.
 4 Q. All right. So on the second occasion is when
 5 you took somebody else?
 6 A. Yes.
 7 Q. All right. So on the second occasion you took
 8 either [REDACTED], right?
 9 A. Yes.
 10 Q. Do you remember which one now, having thought
 11 about it?
 12 A. No. I mean I know -- now I'm pretty sure it
 13 was [REDACTED], but I can't remember which one I
 14 took first.
 15 Q. All right. And, all right, on the second
 16 occasion you said [REDACTED] called you and asked you whether
 17 you wanted to come back or whether you had someone else
 18 that would like to come?
 19 A. Yeah, she said either.
 20 Q. All right. And did she say to you when she
 21 called you "Do you have someone else that would like to
 22 give Mr. Epstein a massage?"
 23 A. Yes.
 24 Q. Or did she say to come and work? What did she
 25 say?

1 A. She asked me both if I wanted to come work or
 2 if I knew somebody what wanted to come work.
 3 Q. Those were her exact words?
 4 MR. HOROWITZ: Form.
 5 THE WITNESS: Pretty much.
 6 BY MR. CRITTON:
 7 Q. When she said that -- again, you have never
 8 texted with [REDACTED] have you?
 9 A. I don't remember. I don't think so.
 10 Q. You never communicated by Facebook or social
 11 networking with [REDACTED]
 12 A. No.
 13 Q. Or anyone on behalf of Mr. Epstein?
 14 MR. HOROWITZ: Form.
 15 THE WITNESS: No.
 16 BY MR. CRITTON:
 17 Q. All right. And when you talked with [REDACTED] and
 18 she said would you like to come and work or do you have
 19 a friend that would like to come and work, you said
 20 what?
 21 A. I told her that I didn't know and that I would
 22 call her back.
 23 Q. And did you at that time -- how much time had
 24 passed since the time you were there the first time?
 25 A. I'm not sure. I think like two weeks or so.

1 Q. And did you say sit back and think -- did you
 2 say to yourself I'm sorry I ever gave him my phone
 3 number?
 4 A. I just tried not like to think about it. I
 5 just, I don't remember.
 6 Q. Did you say geez, that was a traumatic
 7 experience for me, I don't want to go back there or have
 8 anything to do with those people?
 9 MR. HOROWITZ: Form.
 10 THE WITNESS: I don't remember exactly.
 11 BY MR. CRITTON:
 12 Q. Okay. But again, when you heard from [REDACTED]
 13 did all those feelings of being uncomfortable and
 14 anxious and scared, did all those feelings come back to
 15 you when she called you?
 16 A. Yeah, a little bit.
 17 Q. And did you say to yourself, you know, when
 18 [REDACTED] -- strike that.
 19 When [REDACTED] called you and asked you if you
 20 wanted to bring someone else, did you say no?
 21 MR. HOROWITZ: Form.
 22 THE WITNESS: I believe I just said I didn't
 23 know and I'd call her back.
 24 BY MR. CRITTON:
 25 Q. All right. Did you then decide right, I'm not

1 calling this lady back, I want nothing to do with them?
 2 A. I don't know what I decided other than I just
 3 remember [REDACTED] found out about it and [REDACTED]
 4 asked me if I went and if I could bring her.
 5 Q. And did you say you had been there?
 6 A. Yes.
 7 Q. Okay. And why didn't you, when you said you
 8 had been there and she said "Could you take me," why
 9 didn't you just say "Go talk to [REDACTED]. I have got no
 10 interest in going back?"
 11 A. Because she asked me to take her and I knew I
 12 could make money. And I told her, you know, what
 13 happened. And she said that she wanted to make money or
 14 needed money, so --
 15 Q. So you were going to make money of [REDACTED]
 16 making money by taking her to Mr. Epstein's. Did you
 17 consider yourself acting as a pimp?
 18 MR. HOROWITZ: Form.
 19 THE WITNESS: No.
 20 BY MR. CRITTON:
 21 Q. Pardon?
 22 A. No.
 23 Q. What did you consider yourself doing? What
 24 was your role?
 25 A. If she, if I brought her there and told her

1 nothing like [redacted] did me, there is like a difference.
 2 Q. Okay. So did you tell [redacted] what had happened
 3 with you?
 4 A. Yes.
 5 Q. Okay. So [redacted] you told her exactly what you
 6 just told us had happened?
 7 MR. HOROWITZ: Form.
 8 THE WITNESS: Yes, at the time I told her what
 9 happened.
 10 BY MR. CRITTON:
 11 Q. And did you tell her that you had massaged
 12 him, including his chest, he had turned over and then he
 13 had masturbated under a towel?
 14 A. Yes.
 15 Q. And she said what, no problem?
 16 A. She said she still wanted to go.
 17 Q. All right. And did you tell her that you
 18 found the whole situation with Mr. Epstein weird and
 19 awkward?
 20 A. Yes, I'm sure I said that.
 21 Q. And did you tell her you were scared and
 22 nervous when you were up there?
 23 A. I told her it was, you know, awkward. I felt
 24 weird and I told her what happened, but I don't remember
 25 exactly what words I used.

1 A. I don't remember.
 2 Q. What was her reputation around school?
 3 A. It was good.
 4 Q. All right. So what did you do? Did you call
 5 [redacted] back and say "Yep, I'm bringing a friend"?
 6 A. No [redacted] actually called me again, and then
 7 I told her that I, yes, I had a friend that wanted to
 8 come [redacted]
 9 Q. And she said, [redacted] said "Okay, just set up a
 10 time"?
 11 A. Yes.
 12 Q. And did you set up a time and did you take
 13 [redacted] there?
 14 A. I don't remember.
 15 Q. [redacted], was she driving at the time?
 16 A. Yes.
 17 Q. Did you say you were in the same class?
 18 A. Yes.
 19 Q. So one of the two of you drove, and I think
 20 you told us earlier maybe [redacted] went, you just don't
 21 remember, or you think just the two of you went?
 22 A. I don't remember.
 23 Q. So you drive over there. Did [redacted] ask you any
 24 questions as you were going over there?
 25 A. I don't remember.

1 Q. Did you tell her that [redacted] hadn't told you the
 2 truth, that she had deceived you and misrepresented what
 3 was going to happen?
 4 A. I don't remember if I told her that.
 5 Q. Okay. Did you tell her -- did she say "Well,
 6 would you go back up there with him?"
 7 A. She never asked me that.
 8 Q. Okay. So you told her you were, it had been
 9 awkward and weird, that you were scared and nervous?
 10 Did you tell her that?
 11 A. I don't remember.
 12 Q. Did you tell her that he had grabbed your
 13 butt?
 14 A. Yes.
 15 Q. Okay. And she still said "I'll go"?
 16 A. Yes.
 17 Q. Okay. What was S.V.'s reputation at school?
 18 Was she someone who dated a bunch of guys?
 19 MR. HOROWITZ: Form.
 20 BY MR. CRITTON:
 21 Q. I mean was she someone who had intimate
 22 relationship with guys, from what you knew?
 23 A. I mean she had boyfriends.
 24 Q. Do you know whether she was in a sexual
 25 relationship with those boyfriends?

1 Q. Did you feel like you had given [redacted] full
 2 disclosure as to at least what your experience was?
 3 MR. HOROWITZ: Form.
 4 THE WITNESS: Yes.
 5 BY MR. CRITTON:
 6 Q. So even though yours was a miserable
 7 experience, you found it traumatic [redacted] still wanted to
 8 go?
 9 MR. HOROWITZ: Form.
 10 THE WITNESS: Yes.
 11 BY MR. CRITTON:
 12 Q. So you get over there. You go into the
 13 kitchen. Who do you see?
 14 A. [redacted] was there again.
 15 Q. Anyone else?
 16 A. And the brown-haired girl. I forget her name.
 17 I think it's the [redacted] girl.
 18 Q. Who is the [redacted] girl?
 19 A. The brown-haired girl that was always over
 20 there.
 21 Q. Did you meet her at some point?
 22 A. Yes.
 23 Q. What did she look like?
 24 A. She's like really tall and skinny and brown
 25 hair, pretty.

1 Q. So [redacted] may have been there and [redacted]?

2 A. Sarah was there.

3 Q. And what happened? The two of you come in,

4 everybody says hi, and what happens next?

5 A. I just introduce [redacted], and [redacted]

6 talked to [redacted] for a little bit, and they went upstairs

7 and I waited in the kitchen.

8 Q. Okay. And how long was [redacted] gone?

9 A. For about half an hour.

10 Q. She comes back down the stairs?

11 A. Yes.

12 Q. Okay. Did you ever see Jeffrey that day?

13 A. Yes.

14 Q. Did he come down the stairs with [redacted]?

15 A. Yes.

16 Q. What did he say to you?

17 A. We went over in like his living room and then

18 he just gave me money. I forget what he said to me.

19 Q. And did [redacted] see you getting money for

20 bringing her?

21 A. I don't remember.

22 Q. Did she understand that you were going to get

23 money for bringing her?

24 MR. HOROWITZ: Form.

25 THE WITNESS: I don't remember.

1 BY MR. CRITTON:

2 Q. Did you ever tell her?

3 A. I don't remember.

4 Q. When you got back in the car, did you go back

5 home, both of you?

6 A. Yes.

7 Q. Did you ask [redacted] "How was it," or what was

8 your -- you know, "Everything go okay?"

9 A. I don't remember exactly what we talked about.

10 I just, I knew she said something about like he was

11 weird and, you know, she was kind of creeped out. And

12 that's, she didn't really go into detail with me.

13 Q. So she thought Mr. Epstein was weird and she

14 was creeped out by the whole experience.

15 MR. HOROWITZ: Form.

16 THE WITNESS: Yes.

17 BY MR. CRITTON:

18 Q. Okay. And she told you that?

19 A. Yes. That's what I, the summary of what I

20 remember.

21 Q. Okay. And that was consistent with how you

22 felt after the first time, because you thought it was

23 weird and you were creeped out too, weren't you?

24 A. Yes.

25 Q. Did she seem to be a traumatic experience to

1 her like it had been to you?

2 MR. HOROWITZ: Form.

3 THE WITNESS: She didn't go into any detail.

4 I'm sure she was embarrassed.

5 BY MR. CRITTON:

6 Q. As you had been, right?

7 A. Yes.

8 Q. Okay. And did she say anything else?

9 A. Not that I can remember.

10 Q. To your knowledge, did [redacted] ever go back to

11 Mr. Epstein's?

12 A. I don't know.

13 Q. You never took her?

14 A. No. I never took her again.

15 Q. All right. On the third occasion that you

16 went to Mr. Epstein's, is this when you would have taken

17 [redacted]?

18 A. Yes, I believe so.

19 Q. So the third time, how did that happen?

20 A. I don't remember exactly. I just remember me

21 taking her there. I think I might have drove, and

22 basically the same thing with [redacted]

23 Q. Did you tell [redacted] what your experience had

24 been?

25 A. Yes, but she also heard about it from other

1 girls at school, so she also kind of knew what was going

2 on.

3 Q. Had she, did she say, after told her your

4 experience -- I mean you told her again that he had

5 grabbed your butt.

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

7 Q. Yes?

8 A. Yes.

9 Q. Okay. You told her that you had massaged his

10 legs, he had turned over and he had masturbated, at

11 least from your perception, under the towel?

12 A. Yes.

13 Q. Okay. And did she seem to be bothered by that

14 at all?

15 MR. HOROWITZ: Form.

16 THE WITNESS: I don't remember.

17 BY MR. CRITTON:

18 Q. Had she heard that, though, from other girls?

19 A. I think so, yes.

20 Q. And she left you with that impression, "Yeah,

21 I've heard he does that"?

22 A. Yes.

23 Q. Did you tell her that you had taken [redacted]?

24 A. I don't remember.

25 Q. Okay. Well, did you tell her as you told [redacted]

1 that you found the situation weird and awkward and you
2 were uncomfortable, confused, and nervous and scared?

3 MR. HOROWITZ: Form.

4 THE WITNESS: I don't remember, because she
5 already kind of knew about it, so I don't remember
6 what I said to her.

7 BY MR. CRITTON:

8 Q. But you told her that you didn't feel
9 comfortable being there, didn't you?

10 MR. HOROWITZ: Form.

11 THE WITNESS: I don't remember.

12 BY MR. CRITTON:

13 Q. Well, did you mislead her and misrepresent
14 what was going to happen, or did you tell her that it
15 was a very uncomfortable experience for you?

16 MR. HOROWITZ: Form.

17 THE WITNESS: I don't know if she asked me
18 about it, but she already knew what was going on.

19 BY MR. CRITTON:

20 Q. Well, do you remember telling her your
21 experience? That's what I'm interested in. I mean
22 whether she knew it from somebody else, did you tell her
23 your experience?

24 MR. HOROWITZ: Form.

25 THE WITNESS: I don't remember.

1 this occasion?

2 A. I believe [redacted] and maybe [redacted], the girl,
3 brown-haired girl.

4 Q. I'm sorry [redacted] and, and [redacted]?

5 A. Yeah, [redacted].

6 Q. You pull into the kitchen. Was the cook
7 there?

8 A. I think so, yeah. There was usually a cook
9 there.

10 Q. Did you have anything to eat?

11 A. I don't remember.

12 Q. So you sat in the kitchen and did [redacted] take
13 [redacted] upstairs?

14 A. Yes.

15 Q. How long was she up there, about 30 minutes?

16 A. Yes.

17 Q. She comes back down. Did Mr. Epstein come
18 back down again?

19 A. Umm, umm, actually I think that was the time
20 that Sarah brought me up there and Jeffrey was, was in
21 like a smaller room kind of by the bathroom.

22 And he gave me the money and he said something
23 like "good job," and then just tried to grab my butt
24 again. And then I was kind of like pulled away, and he
25 gave me the money and then [redacted] came out and then we

1 BY MR. CRITTON:

2 Q. Okay. Well, whether she asked you whether she
3 could go or not, you were in a situation that you found
4 traumatic, you thought he acted inappropriately, you
5 felt uncomfortable, nervous, scared, and confused.

6 Did you disclose -- didn't you feel you had an
7 obligation to disclose that to her before you allowed
8 her or took her to the house?

9 MR. HOROWITZ: Form.

10 THE WITNESS: She already knew like what was
11 the deal, like what was going on. So it's not like
12 I hid anything from her. And any time they would
13 ask me, I would tell them straight up, you know.

14 BY MR. CRITTON:

15 Q. So you and [redacted] go. You think she knew
16 everything at least that you knew, plus she had heard
17 stuff from other girls?

18 A. Yes.

19 Q. So you felt that she had full knowledge, full
20 disclosure, so to speak?

21 MR. HOROWITZ: Form.

22 BY MR. CRITTON:

23 Q. Is that fair?

24 A. Yes.

25 Q. You go in the house. Who was in the house on

1 left.

2 Q. So when he reached out for your butt, you
3 moved away?

4 A. Yes.

5 Q. So the third occasion, so you and [redacted] then
6 walked downstairs?

7 A. Yes.

8 Q. Did you go to the beach? Did you go shopping,
9 or did you take her home?

10 A. I don't remember what we did. A lot of times
11 I would go to the beach after, but I don't remember
12 specifically.

13 Q. Were you and [redacted] friends?

14 A. Yes.

15 Q. Did she say anything about the episode? Did
16 she say what [redacted] had said, like "This is really weird,
17 this really creeped me out"?

18 A. Yeah, I think she was kind of -- I think every
19 girl that went kind of had that feeling -- like not
20 every girl, but I mean a lot of the girls, the first
21 time they went were kind of confused by everything.

22 Q. So [redacted] gave you at least the impression she
23 thought it was weird and she was kind of creeped out
24 too?

25 A. I mean she didn't tell me, but I would assume.

1 Q. You don't have to assume. I want to know what
 2 she said. Did she say anything to you?
 3 MR. HOROWITZ: Form.
 4 THE WITNESS: I don't remember what she said
 5 to me.
 6 BY MR. CRITTON:
 7 Q. Well, did she say anything or did she suggest
 8 to you -- strike that.
 9 Did she tell you that anything inappropriate
 10 had happened?
 11 MR. HOROWITZ: Form.
 12 THE WITNESS: I don't remember.
 13 BY MR. CRITTON:
 14 Q. Okay. Did she say he had touched her in any
 15 way or assaulted her?
 16 A. No. She didn't say assaulted.
 17 Q. Well, did she say that anything had happened
 18 that was in any way inappropriate?
 19 MR. HOROWITZ: Form.
 20 THE WITNESS: I don't remember.
 21 BY MR. CRITTON:
 22 Q. Again, neither [REDACTED] ever came down
 23 looking distraught or crying or upset, did they?
 24 A. I mean yeah, they kind of looked like upset
 25 and weirded out. None of them ever cried, but --

1 Q. Did they ever call for help when they were
 2 there?
 3 A. No.
 4 Q. Did you after the first visit ever call the
 5 Palm Beach Police Department?
 6 A. No. [REDACTED]
 7 Q. Okay. Did [REDACTED] ever say, "You know what?
 8 This guy did something inappropriate, we should call the
 9 police?"
 10 A. No.
 11 Q. How about [REDACTED] and you? Did [REDACTED] say anything
 12 to you about calling the police that maybe what was
 13 going on was inappropriate?
 14 A. No.
 15 Q. All right. So you made another 200 bucks for
 16 taking somebody else, right?
 17 A. Yes.
 18 Q. Okay. The fourth time now you went, how did
 19 it happen that you went a fourth time?
 20 A. I just heard about, you know, girls going, and
 21 then I just needed money and [REDACTED] like kept calling me,
 22 so then I just decided to go back, but it's hard to
 23 distinct from time to time. I just remember like major
 24 things that happened when I was there.
 25 Q. Okay. The fourth time, you say you needed

1 money. You had a job at the time or you didn't have a
 2 job?
 3 A. I don't think I had a job, no.
 4 Q. So did you ask your parents for money?
 5 A. My parents like rarely gave me money. Like
 6 just when I needed things like bad, like for school.
 7 Q. Who paid for your gas?
 8 A. I would have to like wash my dad's car or
 9 clean the yard. I would have to do chores to get --
 10 Q. So to speak, an honest day's work for an
 11 honest day's pay?
 12 A. Pretty much.
 13 Q. All right. So and how about for insurance,
 14 who paid the car payment and the insurance payment for
 15 the car, your parents?
 16 A. My dad.
 17 Q. All right. Did your parents ever ask you
 18 where you went when you were going over to Palm Beach,
 19 or did they not know you were going to Palm Beach?
 20 A. They didn't know I was going.
 21 Q. All right. So [REDACTED] called, you said you
 22 needed some money, so you said you'd go again?
 23 A. Yes.
 24 Q. Now the fourth time, this is the fourth of the
 25 eight to ten times you went?

1 A. Yes.
 2 Q. So you go on the fourth time, you go. Who was
 3 in the kitchen at the time?
 4 MR. HOROWITZ: Form.
 5 BY MR. CRITTON:
 6 Q. Let me strike that.
 7 Was there anyone in the kitchen at the time?
 8 MR. HOROWITZ: No, that's not my objection.
 9 BY MR. CRITTON:
 10 Q. Fourth visit.
 11 MR. HOROWITZ: That is a better question.
 12 BY MR. CRITTON:
 13 Q. You went to his house the fourth time,
 14 correct?
 15 A. Yes.
 16 Q. You went to the -- did you always go to the
 17 kitchen entrance?
 18 A. Yes.
 19 Q. Did you ring the bell?
 20 A. No.
 21 Q. You just walked in?
 22 A. I think so, yeah.
 23 Q. Was anyone in the kitchen?
 24 A. I don't remember exact like time to time. I
 25 just, I remember usually there was a cook in the

1 kitchen. One time I saw a little girl there. One time
 2 I saw the [redacted] girl there [redacted] was usually always
 3 there.
 4 Q. Can you tell me, can you identify the fourth
 5 time and what happened at the fourth time?
 6 A. I think the fourth time was when he was in the
 7 shower and I went up there.
 8 Q. So you went up. Did [redacted] take you up or you
 9 just knew how to get up there?
 10 A. I think she took me up.
 11 Q. Okay. Now this is the fourth time you went.
 12 You went one time, you were, you felt the situation
 13 completely inappropriate, you were traumatized, you were
 14 scared and confused.
 15 The next two times you take friends. You
 16 explain to them what was going to go on, and they knew,
 17 they heard it from other people.
 18 Why did you put yourself in a position to go
 19 back now a second time yourself after the first
 20 experience was traumatic and awful for you?
 21 MR. HOROWITZ: Form.
 22 THE WITNESS: I don't know, I just, I wanted
 23 money. And I mean a lot of my high school
 24 girlfriends were going and I thought it was kind of
 25 like, you know, getting to be normal almost. And I

1 right?
 2 MR. HOROWITZ: Form.
 3 THE WITNESS: Like I said earlier, I just, I
 4 was confused. I wasn't thinking. I was young.
 5 And a lot of my friends were going and I just
 6 started getting more comfortable because my friends
 7 were going. It wasn't like he was a mean man. He
 8 was like really nice to me, and I mean other than
 9 what he did. But I mean I don't know why.
 10 BY MR. CRITTON:
 11 Q. Okay. Each of the subsequent times, each of
 12 the times from the fourth time through the eighth or the
 13 tenth time, whatever it was, with the second and third
 14 time taking someone else and not you participating, you
 15 voluntarily consented to go to Mr. Epstein's home, true?
 16 A. Yes.
 17 Q. And in each instance, when you were asked
 18 whether you wanted to come and work, you had to make a
 19 decision to say, number one, yes; and then number two,
 20 to get in the car and to transport yourself over there?
 21 A. Uh huh.
 22 Q. Yes?
 23 A. Yes.
 24 Q. All right. And in any instance you could have
 25 told [redacted] that you had no interest in coming

1 don't know, I was just young and confused, and so I
 2 went there again.
 3 BY MR. CRITTON:
 4 Q. But had you ever had -- had you ever put your
 5 hand on or near a kitchen -- do you have a gas or an
 6 electric range?
 7 A. Gas.
 8 Q. Okay. Did you ever put your hand too close to
 9 the flame and it burns?
 10 A. Yes.
 11 Q. Not a pleasant experience, right?
 12 A. Yes.
 13 Q. What's it teach you? Even as a small child,
 14 you learn you don't do that again, right?
 15 MR. HOROWITZ: Form.
 16 THE WITNESS: Yes.
 17 BY MR. CRITTON:
 18 Q. All right. So in this instance you had a very
 19 unpleasant experience with Mr. Epstein --
 20 A. Yes.
 21 Q. -- from the first occasion. Traumatic, as
 22 you've described it.
 23 So why would you put yourself back in that
 24 position again? I mean you had a lot of time to think
 25 it before you ever went back a second time for yourself,

1 back to Mr. Epstein's house, correct?
 2 A. Yes. She would call me a lot, though.
 3 Q. I'm sorry?
 4 A. She called me a lot.
 5 Q. All you had to do was say don't, do not call
 6 me again, correct?
 7 A. Yes.
 8 Q. That's all you had to say?
 9 MR. HOROWITZ: Form.
 10 BY MR. CRITTON:
 11 Q. Did you ever tell [redacted] "Don't call me
 12 anymore, I have no interest in coming to your house"?
 13 A. No.
 14 Q. Okay. Have you ever told someone -- my guess
 15 is you've told males before who wanted to date you, you
 16 have said "Look, I have no interest in dating you, don't
 17 call me anymore."
 18 You have said that to men, haven't you?
 19 A. Yes.
 20 Q. And my guess is you probably said that to some
 21 females over the years, some people that you don't want
 22 to associate with if they call you and say "Look, I'm
 23 sorry I did this to you. Look, don't call me."
 24 You have said that to people, haven't you?
 25 A. Yes.

1 Q. And you could have said that [REDACTED] could
 2 you not?
 3 A. Yes.
 4 Q. All right. But you chose not to for whatever
 5 reason, true?
 6 A. Uh huh.
 7 Q. Yes?
 8 A. Yes.
 9 Q. All right. So the fourth time you go over,
 10 you say you saw him, he was in the shower.
 11 A. Yes.
 12 Q. All right. So what did you do?
 13 A. He was just talking to me while he was in the
 14 shower. And I think he asked me how school was or
 15 something.
 16 And he said he needed to take a shower because
 17 he just went for a jog, and we were just briefly
 18 talking. Then he got out and he grabbed a towel. He
 19 was like all naked and just kind of dried off and then
 20 asked me if I was ready to do the massage.
 21 Q. Were you looking at him when he got out of the
 22 shower or did you turn away?
 23 A. I saw him naked and then I turned away.
 24 Q. Okay. Did you say anything to him when you
 25 say him naked, say "Look, you know, I don't need that"?

1 A. I mean no, I was kind of nervous. I was just
 2 put in an awkward situation, pretty much.
 3 Q. So again, you felt in a very awkward and
 4 uncomfortable position?
 5 A. Uh huh.
 6 Q. Yes?
 7 A. Yes.
 8 Q. All right. Did you say, you know, "I really
 9 don't feel like doing this, I don't feel well, I think
 10 I'll go downstairs"?
 11 A. No.
 12 Q. Okay. I mean you've gotten out of other
 13 events in your life, whether it's a party or going out
 14 with someone by saying "Look, I don't feel well, I have
 15 got a headache, I feel sick," and then you didn't have
 16 to go to dinner with the person or didn't have to go
 17 out?
 18 You have done that before?
 19 A. Yes.
 20 Q. All right. So he puts a towel around himself.
 21 Does he come over and get on the table then?
 22 A. Yes.
 23 Q. Did you start massaging his feet and his legs
 24 again?
 25 A. Yes.

1 Q. Again, you are there. Were all these sessions
 2 about a half hour?
 3 A. Yes.
 4 Q. So you massage his feet and his legs again.
 5 Is he talking to you?
 6 A. Yes.
 7 Q. Does he ever ask you your age?
 8 A. No.
 9 Q. Do you ever tell him your age?
 10 A. I don't think so. I remember telling him I
 11 was in high school.
 12 Q. You did ever show him your fake IDs?
 13 A. No.
 14 Q. Did you tell him you had a fake ID?
 15 A. No.
 16 Q. If he had asked for the ID, you would have
 17 given him the fake ID?
 18 MR. HOROWITZ: Form.
 19 THE WITNESS: No.
 20 BY MR. CRITTON:
 21 Q. Why not?
 22 A. I mean why would I have?
 23 Q. Were you concerned at all about your age?
 24 MR. HOROWITZ: Form.
 25 THE WITNESS: No.

1 BY MR. CRITTON:
 2 Q. So again the fourth time, but the second time
 3 you alone, you massage his feet and his legs.
 4 What happens? Is it the exact same as the
 5 first occasion?
 6 A. No.
 7 Q. How is it different?
 8 A. It was worse. Like every time it gradually
 9 got worse. That was the time when he like grabbed my
 10 buttocks and pulled me closer and after the massage, and
 11 then he tried grabbing my breasts and asked me to take
 12 my shirt off.
 13 And I think I always wore like a bathing suit
 14 there, and he told me that I had like a nice body and I
 15 was pretty. And then he would ask me things, like if I
 16 was still a virgin.
 17 Q. I'm just talking about the fourth visit now.
 18 A. Okay.
 19 Q. This all happened on the fourth visit, the
 20 second time you were there alone?
 21 A. I can't distinct visit to visit. I just
 22 remember the fourth until certain big events that
 23 happened.
 24 Q. You say they got worse and worse. So as of
 25 the second time, you say he grabbed your butt again.

1 A. Yes.
 2 Q. And then you said he tried grabbing your or
 3 touching your breasts?
 4 A. Yes.
 5 Q. Did he?
 6 A. I don't know if he did it on the fourth or the
 7 fifth time, but eventually, yes, he did.
 8 Q. Okay. But on the fourth at least he tried is
 9 what you are saying?
 10 A. Yes.
 11 Q. And you described, you felt that this was a
 12 worse situation than the first time that you had been
 13 there alone?
 14 A. Yes.
 15 Q. All right. Did you feel more scared?
 16 A. Yes.
 17 Q. More anxious?
 18 A. Yes.
 19 Q. And did you feel that his conduct was more
 20 inappropriate?
 21 A. Yes.
 22 Q. And were you more traumatized because he was
 23 more what you perceived to be a little more aggressive?
 24 MR. HOROWITZ: Form.
 25 THE WITNESS: Yes.

1 BY MR. CRITTON:
 2 Q. Okay. Did he ask you -- did you remove any of
 3 your clothing on that visit? This is the second -- the
 4 fourth time recognizing -- I don't want to keep
 5 repeating this, but the second time you brought [redacted] and
 6 the third time you brought [redacted]
 7 So the fourth time, did you remove any of your
 8 clothing?
 9 A. I remember, I just remember him grabbing my
 10 butt and trying to grab my boobs and just like being
 11 more rough with me than the first time I went there.
 12 I don't know if it was the fourth or the fifth
 13 time when I took off my shirt.
 14 Q. All right. So whether it was the fourth or
 15 the fifth, we'll kind of combine those two, but between
 16 the fourth and the fifth, did it get worse from your
 17 perspective than two?
 18 A. Yes.
 19 Q. Did he ask you to take off your shirt on
 20 either let's say on the fifth time?
 21 A. Yes.
 22 Q. And did you have a tank top on?
 23 A. I don't remember exactly what I was wearing.
 24 I usually just wear like a skirt and cute shirt, tank
 25 top.

1 Q. And you had your swimsuit on underneath?
 2 A. Yes.
 3 Q. Which would have been the top and the bottom?
 4 A. Uh huh, yeah.
 5 Q. Your swimsuit, was it a thong or full
 6 swimsuit?
 7 A. It was like a full swimsuit.
 8 Q. Like a two-piece?
 9 A. Yes.
 10 Q. But not like a thong bikini?
 11 A. No.
 12 Q. So on the fourth time did he masturbate again,
 13 or what you perceived to be masturbating?
 14 A. Yes.
 15 Q. And again, under the towel?
 16 A. Yes.
 17 Q. And at the end of the session, at the end of
 18 the massage session, were you again anxious, scared,
 19 very uncomfortable?
 20 A. Yes.
 21 Q. All right. Felt again traumatized by the
 22 events?
 23 A. Yes, I felt upset about everything and
 24 embarrassed, yeah.
 25 Q. And he again paid you 200 bucks?

1 A. Yes.
 2 Q. And when you left that time, you had come
 3 alone, so you went home alone, right?
 4 A. Yes.
 5 Q. And did you make a vow to yourself, I'm not
 6 going back there again, this was worse than the last
 7 time, than the first time when I was there alone, I have
 8 no interest in ever going back to this place?
 9 A. No. I would wait a little bit again and then
 10 just kind of, you know, just wait. And then [redacted] would
 11 keep calling me again, and then I finally gave in again
 12 and went. And I mean yeah.
 13 Q. The fifth time, so between the fourth time and
 14 the fifth time, how much time transpired? How much time
 15 usually transpired between visits?
 16 MR. HOROWITZ: Form.
 17 THE WITNESS: I don't remember, sometimes a
 18 week, sometimes a month.
 19 BY MR. CRITTON:
 20 Q. Were you telling other people, were your
 21 friends aware that you had gone back?
 22 A. Just Jane Doe 4, and I don't know if I told
 23 Jane Doe 3.
 24 Q. Okay. Did you tell them what was going on?
 25 A. I don't remember what I told them.

1 Q. Well, did the three of you talk about what
2 went on when you were there?
3 A. I mean I don't remember generally. I'm sure
4 we talked about it, but I don't remember what was said.
5 Q. Okay. Did you know or did Jane Doe 4, did she
6 ever mention that he masturbated?
7 A. I don't remember.
8 Q. Did Jane Doe 3 ever tell you that Mr. Epstein
9 masturbated when she was there?
10 A. I don't remember.
11 Q. The fifth time you say you removed your shirt,
12 but you still had your top on.
13 A. Yes.
14 Q. Did he touch you in any way?
15 A. Yes. He touched my breast.
16 Q. Over your swimsuit?
17 A. Yeah, and tried to reach under it.
18 Q. He tried, but he didn't?
19 A. The fifth time he didn't. He just kept trying
20 to grab my breast.
21 Q. Did you tell him not to?
22 A. Yeah, I kind of liked pulled away and I was
23 like "I don't feel comfortable."
24 And he's like "Well, you know, you've been
25 here before, you should know." He said something like

1 that.
2 Q. Did he ever pay you more than \$200?
3 A. No.
4 Q. So he always paid you \$200?
5 A. Yes.
6 Q. Okay. Now on that occasion, on the sixth now,
7 you say again -- well, were you on the fifth or the
8 sixth?
9 A. They kind of blend together for me, so --
10 Q. On the fifth or the sixth, what happened
11 again -- now let's go to the sixth. What happened
12 differently on the sixth than the fifth?
13 MR. HOROWITZ: Form.
14 THE WITNESS: I honestly can't remember every
15 visit. I just remember like really the things that
16 stood out. Like it's so painful for me to
17 remember, like I don't know, it's hard to bring
18 back up, and I just remember the main things that
19 happened.
20 BY MR. CRITTON:
21 Q. Well, at some visit, whether it was the fifth
22 or the sixth, you say he tried to touch your breasts.
23 You moved away from him and said you didn't feel
24 comfortable with that.
25 A. Yes.

1 Q. And he said something to the effect of well,
2 you've been here before.
3 A. (Witness nods head up and down.)
4 Q. And you still moved away from him?
5 A. Yes.
6 Q. Is that correct?
7 A. Yes.
8 Q. All right. So as of the sixth visit, you had
9 taken your top off, he had put his hand on your butt and
10 pulled you closer each time; is that true?
11 A. Yes.
12 Q. All right. And he tried to touch your breast,
13 but was not successful, correct? That is, under your
14 swimsuit?
15 A. Yes.
16 Q. And on each of the visits did he masturbate,
17 at least from your perception, under the towel?
18 A. Yes.
19 Q. All right. What happened on the -- what event
20 occurred next, whether it was the seventh or the last
21 visit, if the last visit was the eighth, what happened
22 next?
23 A. Well, I remember being just like, I took off
24 my bottoms and I was just in a bathing suit.
25 Q. Is this now the last time you went?

1 A. No, this is around the sixth or the seventh
2 time probably, and I was just in my bathing suit. And
3 then he pretty much did the same thing.
4 And then he just kept asking me more like
5 vulgar questions every time and --
6 Q. Vulgar questions?
7 A. Yes.
8 Q. Like what?
9 A. Like asked me what I have done with guys and
10 why I was still a virgin.
11 Q. Because you told him that you had done nothing
12 with guys?
13 A. Yes.
14 Q. Other than kissing, making out?
15 A. Yes.
16 Q. I think you testified earlier that you had not
17 had sexual intercourse with a man by then?
18 A. No.
19 Q. And you had not engaged in oral sex, either
20 giving or receiving; is that correct?
21 A. Yes.
22 Q. So you said, whatever question he asked, you
23 said, "I haven't engaged in sex, it was my own choice,"
24 right?
25 MR. HOROWITZ: Form.

1 BY MR. CRITTON:
 2 Q. Strike that. Did you tell him when he said
 3 "Why are you still a virgin," what did you say?
 4 A. I said I hadn't fallen in love yet and I was
 5 waiting until I found somebody I fell in love with.
 6 Q. So you certainly had the presence of mind with
 7 other males, males your age or a few years older or
 8 younger, my guess is guys had encouraged you to try to
 9 have sex with them?
 10 MR. HOROWITZ: Form.
 11 THE WITNESS: I mean not really. I just, I
 12 just, I mean I'm sure guys like hit on me and this
 13 and that, but I've never really been in that
 14 position where I was with Jeffrey where I felt so
 15 obligated to do things and just like in that
 16 situation.
 17 BY MR. CRITTON:
 18 Q. Let me ask you this. Before you ever went to
 19 Mr. Epstein's house, had you ever been in a position
 20 with a boy who tried to get more aggressive than just
 21 kissing you, with a male?
 22 A. I mean I don't think so. I don't remember.
 23 Q. So you're either 15, 16 or 17 when you are
 24 going to Mr. Epstein's house, depending on what your
 25 interrogatories and what you have told us today and what

1 BY MR. CRITTON:
 2 Q. Go ahead.
 3 A. I don't remember. Maybe like I, I don't -- it
 4 was so long ago, I don't remember exactly what happened
 5 in high school and what guys, you know, tried to touch
 6 me or if a guy tried to touch me. I remember, of
 7 course, I made out with people and, you know.
 8 Q. Had you ever tried to touch a guy?
 9 A. No.
 10 Q. All right. So you are at Mr. Epstein's house.
 11 It's now the sixth or the seventh time. You are in a
 12 bathing suit.
 13 On each occasion you felt that he acted
 14 inappropriately, both from a physical standpoint and
 15 from a verbal standpoint at this point, right? The
 16 questions he was asking you?
 17 A. Yes.
 18 Q. All right. You felt that the questions were
 19 becoming more inappropriate?
 20 A. Yes.
 21 Q. And making you more uncomfortable.
 22 A. Yes.
 23 Q. And you were uncomfortable not only with the
 24 questions that he was asking you, but with his actions,
 25 that is, in pulling you close to him by putting his hand

1 you told the Palm Beach police, whatever that date or
 2 whatever that time period was, is it your testimony that
 3 no male had, or that you had done nothing with a male
 4 other than kissing them?
 5 MR. HOROWITZ: Form.
 6 THE WITNESS: While I was going to Jeffrey's?
 7 BY MR. CRITTON:
 8 Q. Yes, during the time that you were going to
 9 Jeffrey's.
 10 MR. HOROWITZ: Form.
 11 THE WITNESS: Yeah, I was a virgin. I didn't
 12 do anything.
 13 BY MR. CRITTON:
 14 Q. And no guy, no male had ever put his hand on
 15 your breast, either on the exterior of your clothes,
 16 under your bra; is that what you are testifying to?
 17 MR. HOROWITZ: Form.
 18 THE WITNESS: I don't really remember. It was
 19 high school. I'm sure some guy tried to touch me
 20 or --
 21 BY MR. CRITTON:
 22 Q. Had a guy touched you?
 23 MR. HOROWITZ: Hold on. You are cutting her
 24 off. Go ahead.
 25

1 on your buttocks, right?
 2 A. Yes.
 3 Q. And trying to reach and touch your breast over
 4 your swimsuit?
 5 A. Yes.
 6 Q. And again, you felt awkward, scared, nervous,
 7 and you felt the situation was weird?
 8 A. Yes, but at the same time he was also like
 9 very nice to me and would ask me questions and say that
 10 he would like get me jobs and he was a good person to
 11 know, so I was confused by the whole situation. It was
 12 kind of conflicting in my head.
 13 Q. You may have had some conflict, but on each
 14 occasion when you came away from Mr. Epstein's,
 15 certainly as of the sixth or seventh time, you felt that
 16 the situation from your perspective was escalating, was
 17 getting worse, right?
 18 A. Yes.
 19 Q. And you felt more uncomfortable than you had
 20 the first time and with each time thereafter felt
 21 equally -- in fact, more uncomfortable?
 22 A. Yes.
 23 Q. And you felt his behavior was more
 24 uncomfortable each time?
 25 A. Uh huh.

1 Q. Yes?
 2 A. Yes.
 3 Q. And so on any of those occasions, whether
 4 before you went back on the fifth, the sixth, the
 5 seventh or the eighth, all you had to do was tell
 6 [REDACTED] is "I'm not coming, I don't feel comfortable,"
 7 right?
 8 A. Yes.
 9 MR. HOROWITZ: Form.
 10 BY MR. CRITTON:
 11 Q. You didn't even have to give a reason, all you
 12 had to do was say "I'm not coming"?
 13 MR. HOROWITZ: Form.
 14 THE WITNESS: Yes.
 15 BY MR. CRITTON:
 16 Q. "It's over, I have no interest in coming
 17 anymore," true?
 18 A. Yes.
 19 Q. And you could have told Mr. Epstein when you
 20 were there and he is asking you these questions that you
 21 felt were inappropriate, all you had to do was say
 22 "Jeffrey, I'm never coming back here if you keep asking
 23 me questions like that."
 24 Did you ever say that?
 25 A. I remember telling him something like "I don't

1 feel comfortable telling you about, you know, guys and
 2 talking about this," and then he just kept pressuring me
 3 and asking me why not.
 4 It's just he's good at talking and he's good
 5 at making you feel like you could tell him stuff, and
 6 he's good at like making you feel like it's okay to do
 7 stuff.
 8 Q. But you knew, you felt it was inappropriate,
 9 right?
 10 So whether he is trying to make you feel
 11 comfortable or not, you in your own mind knew that the
 12 questions were very uncomfortable and inappropriate,
 13 true?
 14 A. Yes, and I told him about it.
 15 Q. All right. So seventh time, now you are in
 16 your swimsuit, he's asking you more direct questions.
 17 You felt even more uncomfortable.
 18 Again, he masturbated under the towel?
 19 MR. HOROWITZ: Form.
 20 THE WITNESS: Yes.
 21 BY MR. CRITTON:
 22 Q. All right. And then you would, he would get
 23 up and go take a shower or he would leave the room and
 24 you would take your 200 bucks and leave the house?
 25 A. Yes.

1 MR. HOROWITZ: Form.
 2 BY MR. CRITTON:
 3 Q. On the eighth time, the next time, what event
 4 happened? Is the next time the last time you were
 5 there?
 6 MR. HOROWITZ: Form.
 7 THE WITNESS: Yeah, the last time was the
 8 worst.
 9 BY MR. CRITTON:
 10 Q. Okay. So on the eighth time when you were
 11 there, what happened?
 12 MR. HOROWITZ: Form.
 13 THE WITNESS: The last time he -- I had my
 14 shirt off. I had a bra and underwear on, and I
 15 gave him a massage. And then that time he was just
 16 the most aggressive with me. And that's when he
 17 like pulled me close to him and he asked me to take
 18 my underwear off, and I said no.
 19 And then he tried to grab it and pull it down,
 20 and I was like "No, I just don't feel comfortable."
 21 And he was like "You've been here plenty of
 22 times before." And then he -- I took my shirt off.
 23 And then he was grabbing my breast, and I kept
 24 pulling away and he kept grabbing it.
 25 And then he just like pulled me closer to him.

1 And that's when he like tried to like reach under
 2 my -- well, he did reach under my underwear and
 3 touch my vagina and he was, like tried fingering
 4 me.
 5 BY MR. CRITTON:
 6 Q. This last time, were you still giving him a
 7 massage?
 8 A. Well, I was like massaging his chest while he
 9 was like doing this.
 10 Q. But you were doing the same kind of massage
 11 you had done before, you were doing his feet, his legs
 12 and then he would turn over?
 13 A. Uh huh.
 14 Q. Ms. Jane Doe 7, you say he got a little more
 15 aggressive. So did you take off your bra?
 16 A. I don't remember. I think he tried to unhook
 17 it and pull it down --
 18 Q. But you didn't let him do that?
 19 A. -- and grab my breast. I think he pulled it
 20 down. I didn't take it all the way off, but he pulled
 21 it down.
 22 Q. Did he touch your breast?
 23 A. Yes.
 24 Q. Both or just one?
 25 A. I know he touched one. I think he touched

1 both.
 2 Q. If he was lying on the table, how is he able
 3 to do that?
 4 A. Touching, like going from -- this is so
 5 embarrassing.
 6 Q. With his left hand or with his right hand?
 7 MR. HOROWITZ: Take your time. Just try to
 8 answer the question as best you can.
 9 THE WITNESS: It was with his left hand.
 10 BY MR. CRITTON:
 11 Q. Okay. So you are saying he pulled down your
 12 bra and then was able to touch your breast with the same
 13 hand that he was pulling your bra down?
 14 A. Well, he pulled it down and then grabbed it.
 15 Q. When he pulled it down, did you move away from
 16 him?
 17 A. Yeah, and then he pulled it down again and he
 18 was being very aggressive.
 19 Q. When he grabbed your bra and pulled it down,
 20 why didn't you just move away from him?
 21 A. I did move away.
 22 Q. Well, why did you ever move back near him
 23 then?
 24 A. Because he pulled me back near him with his
 25 arm.

1 want to tell anybody.
 2 Q. That's the last time you went Mr. Epstein's?
 3 A. Yes.
 4 Q. And on that last occasion that you went to his
 5 house, when you left, where did you go?
 6 A. I don't remember. I think I went home.
 7 Q. All right. Did you ever tell anyone about it?
 8 A. No.
 9 Q. Did you ever tell Jane Doe 4?
 10 A. I mean Jane Doe 4 is maybe the only person I
 11 ever told.
 12 Q. Did you tell her at the time?
 13 A. I don't remember.
 14 Q. At some point did you tell her?
 15 A. I don't remember.
 16 Q. So you don't even know what you told Jane
 17 Doe 4?
 18 MR. HOROWITZ: Form.
 19 THE WITNESS: I don't exactly remember what I
 20 told Jane Doe 4 why I stopped going, like if I told
 21 her everything. I mean I was embarrassed. I
 22 didn't want to like share all my details.
 23 BY MR. CRITTON:
 24 Q. Did anyone, did Sarah ever call you again to
 25 work?

1 Q. Did you say something to him like "Let me go"?
 2 A. Yeah. I said, I just told him, I was like "I
 3 just can't do this," like no. I don't remember the
 4 exact words I used.
 5 And he just made me feel like really stupid
 6 and belittled. He was like "You have been here so many
 7 times and, you know, you should know like what goes on
 8 by now."
 9 And then I just felt like in that position
 10 where like I just felt like obligated or just like I was
 11 just put in that weird position. And then that's when
 12 he pulled me closer to him again, and that's when he
 13 pulled down my underwear, and then that's when he
 14 touched my vagina and tried to finger me.
 15 And then after that, I was just, I was like
 16 no, I'm done after that. And I was just so, I was fed
 17 up with everything. I was like this has gone way too
 18 far.
 19 Q. Did you tell him that?
 20 A. Yeah, I was like I'm done. He knew I felt
 21 really in shock. And then he was like okay, okay. And
 22 then he was just mad at me and just like gave me dirty
 23 looks and just made me feel stupid.
 24 Q. Did you ever call for help?
 25 A. No. I mean I was so embarrassed. I didn't

1 A. Yes.
 2 Q. What did you tell her?
 3 A. I just like ignored her phone calls.
 4 Q. And you could have done that after the very
 5 first time you had been at Mr. Epstein's home, true?
 6 A. Yes.
 7 Q. So at least after the eighth visit, you were
 8 able to ignore [REDACTED] phone calls without a problem at
 9 all?
 10 MR. HOROWITZ: Form.
 11 THE WITNESS: Yeah, I was just in shock and
 12 over it. And I just felt so embarrassed and like
 13 ashamed of myself. And then so that was the last
 14 time.
 15 MR. HOROWITZ: Critton, it's now 6:30.
 16 How far in this tape are we, sir?
 17 THE VIDEOGRAPHER: Fifty-seven minutes into
 18 this tape, sir.
 19 MR. HOROWITZ: Tick, tick, tick.
 20 MR. CRITTON: Let's go off the record for just
 21 a minute.
 22 THE VIDEOGRAPHER: Going off the record at
 23 6:29 p.m.
 24 (A recess was taken.)
 25 THE VIDEOGRAPHER: We are back on the record

1 at 6:36 p.m.
 2 BY MR. CRITTON:
 3 Q. Ma'am, the last time that you went, you were
 4 at Mr. Epstein's house, did he masturbate or not?
 5 A. Yeah, I believe he was masturbating. Well, he
 6 was masturbating. I don't know if he finished,
 7 because --
 8 Q. He climaxed?
 9 A. Yes.
 10 Q. He had the towel over himself again?
 11 A. Yes. I mean I --
 12 Q. You always, each time you were there, he had a
 13 towel over himself and you believe that he was
 14 masturbating?
 15 A. I knew he was masturbating.
 16 Q. You knew it because you could what?
 17 A. I could tell by his hand. I could feel it. I
 18 knew.
 19 Q. All right. But you never saw him masturbate,
 20 you just saw him doing it under the towel, correct?
 21 A. Yes, and I never wanted to look. I'd always
 22 look the other way while he was doing it.
 23 Q. He always had a towel on?
 24 A. Yes.
 25 Q. The only time, if I understood, that you saw

1 him naked was one time he got out of the shower before
 2 he put a towel around himself?
 3 A. I believe so.
 4 Q. And if I also understood your testimony, you
 5 never took off your swimsuit, nor your bra, nor your
 6 underwear at any time, correct?
 7 MR. HOROWITZ: Form.
 8 THE WITNESS: Well, my bra did come like down,
 9 but not completely off.
 10 BY MR. CRITTON:
 11 Q. But you never took it off?
 12 A. No.
 13 Q. Did he ever ask you to take your bra off?
 14 A. Yes.
 15 Q. And you declined?
 16 A. Yes.
 17 Q. Did you ever tell -- strike that.
 18 Did he ever use any type of -- he,
 19 Mr. Epstein, did he ever have a massage or any kind of
 20 what you would have perceived to be a sexual toy?
 21 A. Yeah, he had a vibrator, but he never used it
 22 with me.
 23 Q. How do you know he had one?
 24 A. Because Jane Doe 4 and them told me about it
 25 and also it was laying right there in the drawer he had.

1 Q. Anything else in the drawer?
 2 A. I don't remember what else was in the drawer.
 3 Q. What were you doing in the drawer?
 4 A. The drawer was open.
 5 Q. And what did the vibrator look like or the
 6 massager look like?
 7 MR. HOROWITZ: Form.
 8 THE WITNESS: I'm pretty sure it was just
 9 white.
 10 BY MR. CRITTON:
 11 Q. Do you know the difference? Have you ever
 12 used a vibrator?
 13 MR. HOROWITZ: Form.
 14 THE WITNESS: Yeah -- no, I mean like a
 15 massager?
 16 BY MR. CRITTON:
 17 Q. Well, your lawyer was laughing when I
 18 interchanged the massager for the vibrator.
 19 MR. HOROWITZ: That's because she called it a
 20 vibrator and you are calling it a massager.
 21 MR. CRITTON: Well, I'm not sure what it is,
 22 so we're going to find out. So you don't have to
 23 laugh and nobody else does too.
 24 MR. HOROWITZ: I wasn't laughing.
 25

1 BY MR. CRITTON:
 2 Q. Do you know what the distinction between a
 3 massager and a vibrator?
 4 A. Yes.
 5 Q. Okay. What do you understand a massager is?
 6 A. Massager, I just, I know the difference. I'm
 7 not --
 8 Q. Okay. What you saw in the drawer, was it a
 9 massager or it was a vibrator?
 10 A. It looked to me like a vibrator.
 11 Q. What did it look like? Describe it, please.
 12 A. The one I saw was just white and it had like,
 13 I don't know, a big thing on the end that was white.
 14 Q. Did it look like something that you would get
 15 at like an adult store or did it look like something you
 16 would get from Brookstone, or do you know?
 17 A. I mean I don't know. I mean I heard he uses
 18 that as the, as the vibrator. So I'm assuming that was
 19 the vibrator.
 20 Q. You heard that from Jane Doe 4?
 21 A. Yes.
 22 Q. From anyone else?
 23 A. I don't think so.
 24 Q. And as to whether it was a vibrator or a
 25 massager, if you purchased it, whether it would be

1 considered a vibrator or a massager, you don't know;
 2 would that be a fair statement?
 3 MR. HOROWITZ: Form.
 4 THE WITNESS: Yes.
 5 BY MR. CRITTON:
 6 Q. Okay. But he never used that on you, nor did
 7 he ever attempt to use that on you, whatever it was,
 8 correct?
 9 A. Yes.
 10 Q. That's correct?
 11 A. Yes.
 12 Q. Did you ever discuss with your boyfriends,
 13 even the long terms, the [REDACTED] from '07, '08 and '09,
 14 did you ever tell them anything about Mr. Epstein?
 15 A. Absolutely not.
 16 Q. Okay. You said that you had flashbacks.
 17 Describe what you mean by a flashback.
 18 A. Just when somebody would say his name or I
 19 would just even hear Jeffrey, just like me being there,
 20 the massage table, him in the shower, I would just get
 21 flashbacks.
 22 Q. You had bad memories of that?
 23 A. Yes. Even, sometimes even nobody had to say
 24 anything. Like I would just be like in a bad mood or
 25 upset and I would just get, you know, just memories or

1 Q. Okay.
 2 A. It was like a really bad dream.
 3 Q. Is that the last dream you've had about that
 4 separate and apart from the flashbacks?
 5 A. I remember having other dreams, but they
 6 weren't like as bad. They weren't like, nothing like
 7 significant that I could remember. I just remember that
 8 one, like I woke up crying and felt like I was having a
 9 panic attack.
 10 And I mean it was, actually it was when I
 11 worked in [REDACTED] saloon, because I had a dream that he
 12 came there to visit me. And my parents were there and
 13 it was just like a really bad nightmare that I had.
 14 Q. Okay. Is that the last time you had a dream
 15 about it separate and apart from the flashbacks?
 16 A. I mean I've seen him, like I have had dreams,
 17 but none that I could really remember like
 18 significantly.
 19 Q. Okay.
 20 MR. CRITTON: How about another five minutes
 21 and then I'm done.
 22 MR. HOROWITZ: Five is fine. You are on the
 23 clock.
 24 BY MR. CRITTON:
 25 Q. I asked you earlier whenever [REDACTED] would call

1 flashbacks.
 2 Q. Does that happen very often or is that just
 3 really if you, if someone brings up the episode, like if
 4 you have something to do with this case or you would
 5 read about Mr. Epstein, then you would think back of the
 6 time that you were there?
 7 A. I mean the flashbacks like have always
 8 happened.
 9 Q. I'm sorry?
 10 A. They have always happened, but it gets worse
 11 when, you know, I hear about the case or somebody says
 12 something to me about it or I have to, you know, talk to
 13 somebody about it.
 14 Q. Did in terms of -- have you ever had a dream?
 15 A. Yes.
 16 Q. How often do you have a dream or how many
 17 dreams have you ever had about having been at
 18 Mr. Epstein?
 19 MR. HOROWITZ: Form.
 20 THE WITNESS: I don't remember exactly, but I
 21 remember one that like stood out really clearly.
 22 BY MR. CRITTON:
 23 Q. How long ago?
 24 A. It was about when I was talking to the FBI, so
 25 probably about three years ago.

1 you, and I think -- well, let me strike that.
 2 When I asked you earlier, I think you said
 3 that Sarah never texted you through the phone, nor did
 4 she ever communicate with you over the computer,
 5 correct?
 6 A. I don't believe, I definitely never had any
 7 e-mails or computer, but I don't think she ever texted
 8 me.
 9 Q. All right. And the only communication
 10 separate and apart from the conversation that you had
 11 with [REDACTED] or the voice message that she left you when
 12 you were with the Palm Beach police and they were
 13 interviewing you, all other calls for [REDACTED] were dealing
 14 with could you come or could you bring someone else to
 15 come to work?
 16 MR. HOROWITZ: Form.
 17 THE WITNESS: Yes.
 18 BY MR. CRITTON:
 19 Q. And you understood that to mean could you come
 20 and give Mr. Epstein a massage?
 21 MR. HOROWITZ: Form.
 22 THE WITNESS: Yes. Well, she said -- well,
 23 basically, yeah.
 24 BY MR. CRITTON:
 25 Q. And she never, that is [REDACTED] never said to

1 you "I want you to come to work to provide sexual
 2 services for Mr. Epstein?"
 3 She never said that, did she?
 4 MR. HOROWITZ: Form.
 5 THE WITNESS: No.
 6 BY MR. CRITTON:
 7 Q. All right. And based on what you told me,
 8 just told me, [REDACTED] never attempted to persuade or to
 9 induce or to entice you to engage in any sexual conduct
 10 with Mr. Epstein during any phone conversation, did she?
 11 MR. HOROWITZ: Form.
 12 THE WITNESS: Just the massages and basically
 13 that.
 14 BY MR. CRITTON:
 15 Q. Right. And she's the only one who ever called
 16 you, true?
 17 A. I think so.
 18 Q. Has anyone, separate and apart from the
 19 allegations you have made in this complaint, has anyone
 20 ever attempted to sexually assault you or to rape you?
 21 A. No.
 22 Q. At any time? Have you ever been attacked by
 23 anyone?
 24 A. No.
 25 Q. Other than your trip to Italy this coming

1 Q. Does she work now?
 2 A. Yes.
 3 Q. What's her boyfriend's name?
 4 A. [REDACTED]
 5 Q. [REDACTED] what?
 6 A. I think [REDACTED] or -- I don't know.
 7 Q. Is that [REDACTED] that used to be friends
 8 with [REDACTED]?
 9 A. No.
 10 Q. Different [REDACTED]?
 11 A. Yes, different [REDACTED].
 12 Q. Did you know that [REDACTED]?
 13 A. Yes.
 14 Q. Since Jane Doe 4 and [REDACTED] broke up --
 15 A. Yes.
 16 Q. -- have you seen [REDACTED] at all since then?
 17 A. I think I just saw him once when I was
 18 downtown.
 19 Q. Okay. Did you consider him kind of a scary
 20 character? Was he someone you were scared of?
 21 A. I was never scared of him. I just thought he
 22 was, thought he was an asshole. I never really liked
 23 him because of what happened with Jane Doe 4.
 24 Q. Did you ever know Jane Doe 4's boyfriend,
 25 [REDACTED]

1 summer, any other plans for trips, vacations --
 2 A. No.
 3 Q. -- when you finish college?
 4 A. No. I'm just saving up for Italy.
 5 Q. Do you plan to stay, when you finish your
 6 month in Italy, do you plan to try to save up enough
 7 money so you can travel a little bit before you can come
 8 to the states?
 9 A. I don't think so. There are certain dates,
 10 it's only like a month, and everybody is pretty much
 11 leaving together.
 12 Q. Are any of your friends going with you?
 13 A. Not -- there are just people from school.
 14 Q. Okay. I asked you earlier -- this is my last
 15 short series. I asked you, you said Jane Doe 4 is your
 16 best friend. Who is your next best friend?
 17 A. I mean probably [REDACTED]
 18 Q. [REDACTED]?
 19 A. Yes.
 20 Q. Next down the scale from [REDACTED] would be whom?
 21 A. Jane Doe 3.
 22 Q. Is [REDACTED] still in town, in the West Palm Beach
 23 area, Palm Beach County?
 24 A. Sometimes she's in town because her parents
 25 live here, but she lives with her boyfriend in Atlanta.

1 A. Yes.
 2 Q. Nice guy?
 3 A. Really nice guy.
 4 MR. CRITTON: Okay, that's all I've got.
 5 Thank you. Read?
 6 MR. HOROWITZ: We'll read, and we'll take a
 7 copy if it's ordered.
 8 THE VIDEOGRAPHER: Going off the deposition at
 9 6:49. This is the end of the deposition.
 10 (Witness excused.)
 11 (Deposition was concluded.)
 12
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CERTIFICATE OF OATH
STATE OF FLORIDA
COUNTY OF PALM BEACH

I, the undersigned authority, certify that
Jane Doe #7 personally appeared before me and was duly
sworn on the 15th day of March, 2010.

Witness my hand and official seal this 25th
day of March, 2010.

Rachel W. Bridge



Rachel W. Bridge, RMR, CRR
Notary Public - State of Florida
My Commission Expires: 1/15/11
My Commission No.: DD 607230

DATE: March 25, 2010
TO: Jane Doe #7
c/o Adam D. Horowitz, Esq.
Mermelstein & Horowitz, P.A.
18205 Biscayne Boulevard
Suite 2218
Miami, Florida 33160

IN RE: Jane Doe No. 2 vs. Epstein

The transcript of your deposition taken on
3-15-10 has been completed and awaits reading and
signing. As previously agreed, the transcript will be
furnished to you through your counsel.

At the end of the transcript you will find an
errata sheet. As you read your deposition, any changes
or corrections that you wish to make should be noted on
the errata sheet, citing page and line number of said
change. Once you have read the transcript and noted any
changes, be sure to sign and date the errata sheet and
return these pages to me.

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

Sincerely,

Rachel W. Bridge, RMR, CRR
PROSE COURT REPORTING AGENCY
250 Australian Avenue South, #1500
West Palm Beach, Florida 33401
Phone: [REDACTED]

I do hereby waive my signature.

Jane Doe #7

CERTIFICATE
STATE OF FLORIDA
COUNTY OF PALM BEACH

I, Rachel W. Bridge, Certified Realtime
Reporter and Notary Public in and for the State of
Florida at Large, do hereby certify that the
aforementioned witness was by me first duly sworn to
testify the whole truth; that I was authorized to and
did report said deposition in stenotype; and that the
foregoing pages numbered 1 to 446, inclusive, are a true
and correct transcription of my shorthand notes of said
deposition.

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

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

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

Dated this 25th day of March, 2010.

Rachel W. Bridge
Rachel W. Bridge, RMR, CRR

CERTIFICATE

THE STATE OF FLORIDA
COUNTY OF PALM BEACH

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

Dated this ___ day of _____,
2010.

JANE DOE #7

1 ERRATA SHEET
 2 IN RE: Jane Doe No. 2 vs. Epstein CR: Rachel Bridge
 3 DEPOSITION OF: JANE DOE #7
 4 TAKEN: 3-15-10
 5 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
 6 PAGE # LINE # CHANGE REASON

7	_____	_____	_____
8	_____	_____	_____
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14	_____	_____	_____
15	_____	_____	_____
16	_____	_____	_____

17
 18 Please forward the original signed errata sheet to this
 office so that copies may be distributed to all parties.

19
 20 Under penalty of perjury, I declare that I have read my
 deposition and that it is true and correct subject to
 any changes in form or substance entered here.

21
 22 DATE: _____

23
 24 SIGNATURE OF DEPONENT: _____
 25