

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL  
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO:502008CA028051XXXXMB AB

█.

Plaintiff,

-vs-

VOLUME IV OF IV

JEFFREY EPSTEIN  
AND █,

Defendants.

\_\_\_\_\_/

VIDEO-CONFERENCED AND VIDEOTAPED DEPOSITION OF █.

Tuesday, February 09, 2010  
10:09 - 5:05 p.m.

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

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting  
Job No.: 1296



1 APPEARANCES:  
 2 On behalf of the Plaintiff, [REDACTED] and Jane Doe:  
 3 BRAD J. EDWARDS, ESQUIRE  
 4 FARMER, JAFFE, WEISSING, EDWARDS  
 5 FISTOS & LEHRMAN, P.L.  
 6 [REDACTED]  
 7 On behalf of the Defendant, Jeffrey Epstein:  
 8 ROBERT D. CRITTON, JR., ESQUIRE  
 9 MARK T. LUTTIER, ESQUIRE  
 10 BURMAN, CRITTON, LUTTIER & COLEMAN, LLP  
 11 [REDACTED]  
 12 On behalf of the Defendant, Jeffrey Epstein:  
 13 JACK ALAN GOLDBERGER, ESQUIRE  
 14 ATTERBURY, GOLDBERGER & WEISS, P.A.  
 15 [REDACTED]  
 16  
 17 ALSO PRESENT: Jeffrey Epstein, via video conference  
 18 Daniel Downey, Videographer  
 19 Visual Evidence, Incorporated  
 20  
 21  
 22  
 23  
 24  
 25

1 PROCEEDINGS  
 2 ---  
 3 THE VIDEOGRAPHER: We're back on the  
 4 record at 1:48 p.m.  
 5 BY MR. LUTTIER:  
 6 Q. Okay, Ma'am. I want to add that during  
 7 the morning session, I was asking you some  
 8 questions. I just want to go over a couple of  
 9 things. One of the first things I asked you this  
 10 morning is whether you understood you were under  
 11 oath today. And you indicated you did understand  
 12 that?  
 13 A. Correct.  
 14 Q. Are you, did you, are you aware of the  
 15 fact that it is a crime known as perjury to make a  
 16 false statement under oath?  
 17 A. Correct.  
 18 Q. Are you also aware that it is a separate  
 19 crime, a federal crime to make a false statement to  
 20 an FBI agent?  
 21 A. Correct.  
 22 Q. And you've already admitted that you  
 23 committed that federal crime; you lied to the FBI,  
 24 according to you.  
 25 A. I was in fear of my son's life, correct.

1 ---  
 2 INDEX VOLUME I  
 3 ---  
 4 WITNESS: DIRECT CROSS REDIRECT RECROSS  
 5 [REDACTED]  
 6  
 7 BY MR. LUTTIER 4  
 8  
 9  
 10  
 11 E X H I B I T S  
 12 ---  
 13  
 14 EXHIBIT DESCRIPTION PAGE  
 15 DEFENDANT'S NO. 3  
 16 Photo of Fantasies of Palm Beach 512  
 17  
 18 DEFENDANT'S NO. 4 518  
 19 Photo of Demon's Motorcycle ad  
 20 DEFENDANT'S NO. 5 634  
 21 Petition for Injunction for [REDACTED]  
 22 DEFENDANT'S NO. 6 618  
 23 Petition for Injunction for [REDACTED]  
 24  
 25

1 Q. Now, I want to ask you one more time: Is  
 2 there anything you want to correct about any of your  
 3 testimony this morning, especially as it relates to  
 4 working in places of employment that you have termed  
 5 to be jack shacks at or about or near Spearmint  
 6 Rhino?  
 7 A. Correct. I'm fine on that.  
 8 Q. Okay. Isn't it a fact that on Saturday,  
 9 January 30th, you went to Spearmint Rhino's?  
 10 A. Yes.  
 11 Q. And you got there, what time, around 8:00?  
 12 A. Yes.  
 13 Q. And then at some point in time you left  
 14 Spearmint Rhino's, did you not?  
 15 A. Yes.  
 16 Q. And you went to a place called Fantasies  
 17 of Palm Beach, did you not?  
 18 A. Not that I recall. I don't know a name  
 19 Fantasies.  
 20 Q. Well, Fantasies of Palm Beach would be the  
 21 facility that's located right next door to Spearmint  
 22 Rhino's. You're familiar with that, aren't you?  
 23 A. I thought that was affiliated with Spearmint  
 24 Rhino.  
 25 Q. Well, so that we know --

2 (Pages 503 to 506)

1 (Cellphone interruption.)  
 2 THE WITNESS: Oh, I'm sorry, my phone.  
 3 MR. LUTTIER: Sure. Go ahead.  
 4 THE WITNESS: Okay. Sorry.  
 5 BY MR. LUTTIER:  
 6 Q. There is a -- whether or not it's  
 7 affiliated with Spearmint Rhino, I don't know. When  
 8 you referred to your testimony this morning that you  
 9 didn't go anyplace other than Spearmint Rhinos and  
 10 places affiliated did, with it, did you mean to  
 11 include in those places that you went Fantasies of  
 12 Palm Beach?  
 13 A. I personally never heard of Fantasies of Palm  
 14 Beach, but I know that, there, that Spearmint Rhino has  
 15 a couple places affiliated with them.  
 16 Q. What places do they have that are  
 17 affiliated with them?  
 18 A. The back and then there's an entrance to  
 19 another place. That's all I know.  
 20 Q. Well, tell me about this entrance to  
 21 another place. What are you talking about?  
 22 A. Well, in the back of Spearmint Rhino there is  
 23 a little section that the dancers -- I don't know  
 24 exactly what they do there, but that's where I do sell  
 25 shoes and my lingerie.

1 And then there is another entrance that  
 2 you can go through and then there is another -- it's  
 3 like there's, I know that there's, there's a lot of  
 4 doors. I don't know what they consist of. I don't  
 5 know what they do there, but I know that they are  
 6 affiliated, I thought that they were affiliated with  
 7 Spearmint Rhino, and that's where I also go to sell  
 8 my shoes and purses.  
 9 Q. Okay. Well, you talked about a place in  
 10 the back of Spearmint Rhino's that you gain access  
 11 to by going through the Spearmint Rhino  
 12 establishment?  
 13 A. Yes.  
 14 Q. All right. Now, what is this second place  
 15 that you are talking about that you say is  
 16 affiliated with Spearmint Rhino's?  
 17 A. Well, you can either go through out the back  
 18 door of Spearmint Rhino and take a right, and then there  
 19 is a place there that's affiliated with them.  
 20 Q. Is there a name? Is there a separate  
 21 entrance to the place?  
 22 A. I -- they're connected.  
 23 Q. Is there a separate name on this place?  
 24 A. Not that I know of.  
 25 Q. Okay. I'm talking about a place that's

1 located, I believe it's to the left side of  
 2 Spearmint Rhino's as you look at it. It's got a  
 3 separate entrance. It's got neon signs on it?  
 4 A. Okay.  
 5 Q. And it's known as Fantasies of Palm Beach.  
 6 You're aware of that place, aren't you?  
 7 MR. EDWARDS: Form.  
 8 THE WITNESS: I'm not aware of any name.  
 9 BY MR. LUTTIER:  
 10 Q. Well, you were in the establishment known  
 11 as Fantasies of Palm Beach on the evening of  
 12 Saturday, January 30th, 2010, were you not?  
 13 MR. EDWARDS: Form.  
 14 THE WITNESS: If that's what it's called,  
 15 then, yes. But, as long, as far as I know,  
 16 Spearmint Rhino, that's the name I know it as  
 17 of, you know.  
 18 BY MR. LUTTIER:  
 19 Q. Well, this is a place that has a separate  
 20 entrance. You don't go through the entrance of  
 21 Spearmint Rhino. You go into a separate entrance  
 22 for a place called Fantasies of Palm Beach.  
 23 A. Well --  
 24 Q. I want to make sure we're real clear here  
 25 we're not playing semantics.

1 A. We're not playing what?  
 2 Q. Semantics.  
 3 A. Okay.  
 4 MR. CRITTON: Word games.  
 5 THE WITNESS: Oh.  
 6 MR. LUTTIER: All right?  
 7 THE WITNESS: Yeah.  
 8 BY MR. LUTTIER:  
 9 Q. And, and you were, in fact, in this place  
 10 called Fantasies of Palm Beach on Saturday, January  
 11 30th, 2010, were you not?  
 12 MR. EDWARDS: Object to the form.  
 13 THE WITNESS: I definitely walked through  
 14 an entrance and that I thought was affiliated  
 15 with Spearmint Rhino.  
 16 BY MR. LUTTIER:  
 17 Q. And there's a black female in there that  
 18 works at the front desk, is there not? There was on  
 19 Saturday night.  
 20 A. Oh, I don't know. I don't know who works  
 21 there. I don't know.  
 22 Q. And the --  
 23 A. I just know that I go into Spearmint Rhino and  
 24 I sell my --  
 25 Q. And --

1 A. -- items.  
 2 Q. -- the name that you're known as is  
 3 [REDACTED] isn't that right?  
 4 A. I'm not known as [REDACTED]  
 5 Q. That's the name you -- remember we were  
 6 asking you about the cards you used to use?  
 7 A. Yeah, I was known as [REDACTED] in '07 and '08.  
 8 Q. So that's the name you've used in the past  
 9 is [REDACTED]?  
 10 A. Yes.  
 11 Q. And in fact on Saturday, January 30th, you  
 12 were working in Fantasies of Palm Beach which was,  
 13 to use your terms, a jack shack, were you not?  
 14 A. No, I was not working there.  
 15 Q. And you were charging \$120 for a half hour  
 16 to perform services; isn't that right?  
 17 A. No.  
 18 Q. And you came out and told somebody your  
 19 name was [REDACTED] and that that was your charge,  
 20 didn't you not?  
 21 A. No, I did not. All I do is sell shoes and  
 22 purses there.  
 23 MR. LUTTIER: Let me show you a picture  
 24 here which we'll mark as, I guess we want to do  
 25 it in order. It will be Exhibit 3.

1 (Defendant's Exhibit No. 3 was marked for  
 2 identification.)  
 3 THE WITNESS: This place, yeah, it's next  
 4 to Spearmint Rhino's.  
 5 MR. LUTTIER: Hold on. Hold on.  
 6 THE WITNESS: Sorry.  
 7 BY MR. LUTTIER:  
 8 Q. I have to ask you a couple of questions.  
 9 Do you recognize Exhibit 3?  
 10 A. Yes, but what I would do, I would go out of  
 11 Spearmint Rhino from the back and go into the back  
 12 entrance of Fantasies or whatever this place is called.  
 13 Q. So, so, now upon seeing the picture, you  
 14 want to correct your testimony and say, in fact, you  
 15 were in Fantasies of Palm Beach on Saturday?  
 16 A. I, from my understanding, from my knowledge, I  
 17 thought that this place was owned by Spearmint Rhino.  
 18 Q. All right. The place of business that's  
 19 depicted in Exhibit No. 3, were you in that place of  
 20 business on Saturday, January 30th?  
 21 A. Yes, selling my items.  
 22 Q. And did you, in fact, on that night, on  
 23 Saturday, January 30th, tell individuals that your  
 24 name was [REDACTED] and that you charged \$120 per half  
 25 hour?

1 A. No. I say to the girls, my name is Lynn and  
 2 they know that I sell all of my, all of my clothes and  
 3 lingerie and shoes and everything else I sell.  
 4 Q. But there is no doubt that now that you  
 5 have seen this picture, you were in that  
 6 establishment that is depicted on Exhibit No. 3 on  
 7 January 30th, right?  
 8 A. Correct.  
 9 Q. And you drive a white Mitsubishi Gallant;  
 10 is that right?  
 11 A. Yes.  
 12 Q. License plate number is 193HV; is that  
 13 correct.  
 14 A. I don't know my license plate number, but I  
 15 definitely drive a white Mitsubishi Gallant.  
 16 Q. And is, was that vehicle parked outside  
 17 Fantasies of the Palm Beach on Saturday night,  
 18 January the 30th?  
 19 A. Yes, but like I said before, from my  
 20 knowledge, I thought this was affiliated with Spearmint  
 21 Rhino.  
 22 Q. And that car --  
 23 A. And they don't like me to park, they don't  
 24 like me to park in front of Spearmint Rhino because  
 25 there are so many clientele that goes in and out. So

1 they need as much parking space as they can.  
 2 Q. And you stayed at Fantasies of Palm Beach  
 3 until what hour on the morning of Sunday which would  
 4 be January 31st?  
 5 A. I stayed until what time?  
 6 Q. Yeah, the morning until -- what time on  
 7 the morning of Sunday, January 31st, did you leave?  
 8 A. Well, Spearmint Rhino, I would go until  
 9 closing like 5, 6. And then in the back of here, of  
 10 Spearmint Rhino, that's like, sometimes they have after  
 11 parties there, something. This is what I hear from the,  
 12 the manager at Spearmint Rhino. And like I said,  
 13 sometimes I stay there and I have a couple of drinks.  
 14 And I'm not sure what time I left.  
 15 Q. I don't want to know --  
 16 A. As long as I keep on selling shoes and  
 17 lingerie, I'm the there.  
 18 Q. I am not asking about sometimes. I am  
 19 talking about Sunday morning, January 31st, 2010,  
 20 what time did you leave on that day?  
 21 A. I couldn't tell you that. I don't know.  
 22 Q. Well, what's your best estimate?  
 23 A. I don't know, sir.  
 24 Q. Well, first of all you closed Spearmint  
 25 Rhino at, what, 5 in the morning?

1 A. I closed it?  
 2 Q. Yeah, you were there until it closed?  
 3 A. Yes.  
 4 Q. And then you went over to Fantasies,  
 5 right?  
 6 A. That I thought was Spearmint Rhino from the  
 7 back.  
 8 Q. Whatever.  
 9 A. Okay.  
 10 Q. And then, how much longer did you stay  
 11 there?  
 12 A. I stayed there a little while because there is  
 13 more girls there that like to buy my items.  
 14 Q. Now, let's talk about your trip to New  
 15 York.  
 16 A. Okay.  
 17 Q. Tuesday, February 2nd, 2010. Remember I  
 18 asked you earlier about whether you ever used any  
 19 business cards?  
 20 A. Yes.  
 21 Q. When you went on this trip to New York,  
 22 did you have any cards?  
 23 A. No, not that I -- no.  
 24 Q. Did [REDACTED] have any cards?  
 25 A. Not that I know of.

1 Q. Did you, when you went to the Palm Beach  
 2 International Airport, did you give the taxicab  
 3 driver a card?  
 4 A. Did I give him a card?  
 5 Q. Yeah, you or [REDACTED], little business card?  
 6 A. I didn't give him a card, no.  
 7 Q. Did [REDACTED] give him a business card?  
 8 A. Not that I know of.  
 9 Q. When you went into the Palm Beach  
 10 International Airport, your card -- do you recall  
 11 going to a bar?  
 12 A. Palm Beach International Airport, yeah, I went  
 13 to a bar there --  
 14 Q. What bar do you go to?  
 15 A. -- because I totally missed the flight.  
 16 Q. What bar did you go to?  
 17 A. I think it was Fridays, if I am not mistaken  
 18 or not. I don't know what it was called.  
 19 Q. Who went to the bar with you?  
 20 A. I went with [REDACTED] to the bar and it was just  
 21 her and I.  
 22 Q. And for how long was it just the two of  
 23 you?  
 24 A. For like ten minutes.  
 25 Q. And then what happened?

1 A. And we started talking to people.  
 2 Q. Who did you talk to in particular?  
 3 A. I don't know anyone else.  
 4 Q. Did you talk to a male there?  
 5 A. Yeah.  
 6 Q. Have him over at your table?  
 7 A. He came closer to -- we were at the bar.  
 8 Q. The three of you were talking, were you  
 9 not?  
 10 A. Yeah.  
 11 Q. Do you remember the guy having a laptop?  
 12 A. Yes.  
 13 Q. What did you-all do on the laptop or what  
 14 did he do on the laptop while you were there and you  
 15 both were sitting there?  
 16 A. Well, I told him that I modeled for Demons  
 17 Cycles. And I told him if he would like to see my  
 18 pictures, to go onto Demons Cycles.  
 19 Q. So, did you tell him about any other  
 20 websites?  
 21 A. Excuse me?  
 22 Q. Did you tell him about any other websites?  
 23 A. No, not that I recall.  
 24 MR. LUTTIER: Let's mark this as  
 25 exhibit -- what's this, 4?

1 THE COURT REPORTER: Four.  
 2 MR. LUTTIER: Mark this as 4.  
 3 MR. EDWARDS: Is Exhibit 1 and 2 marked --  
 4 MR. LUTTIER: Yeah.  
 5 MR. EDWARDS: -- in the previous depo?  
 6 MR. LUTTIER: Yeah, the previous depo.  
 7 Although I don't know where the exhibits are or  
 8 they were.  
 9 MR. EDWARDS: Okay.  
 10 MR. LUTTIER: It was like answers to  
 11 interrogatories. Something like that.  
 12 MR. EDWARDS: Okay.  
 13 (Defendant's Exhibit No. 4 was marked for  
 14 identification.)  
 15 BY MR. LUTTIER:  
 16 Q. Let me show you what's been marked as  
 17 Exhibit 4 and ask you if you can identify that.  
 18 A. This is --  
 19 MR. EDWARDS: Wait until he asks you a  
 20 question.  
 21 BY MR. LUTTIER:  
 22 Q. Can you identify it?  
 23 A. Yes.  
 24 Q. What is it?  
 25 A. This is -- I modeled for Demon Cycles and it

5 (Pages 515 to 518)

(561) 832-7500

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1 is their advertisement now.  
 2 Q. And is this one of the pictures on your  
 3 website?  
 4 A. On my website?  
 5 Q. Yeah, or your Facebook, I guess, account  
 6 or MySpace, whatever it was.  
 7 A. Yeah, I have posted it on there, yeah.  
 8 Q. Is, was this one of the pictures you were  
 9 telling us at your last deposition that you really  
 10 wouldn't want your four-year-old son to see?  
 11 A. No, that's fine if he sees this. This is,  
 12 this is very legit. His mother modeled and I am  
 13 actually very proud of this photo.  
 14 Q. All right. Now, did you do anything else  
 15 with this individual before you left the bar that  
 16 you, you and [REDACTED] were talking to at the Palm Beach  
 17 International Airport?  
 18 A. Did we do anything with him?  
 19 Q. Did you give him anything, either you or  
 20 [REDACTED]?  
 21 A. I don't recall giving him anything but --  
 22 Q. Well, did you see [REDACTED] give him anything?  
 23 A. No.  
 24 Q. Did either one of you give him a business  
 25 card?

1 Q. Did you do anything else that evening?  
 2 A. Yes, we went out to dinner.  
 3 Q. After you -- did you leave the apartment  
 4 and go look around at Grand Central Station and then  
 5 keep on walking around or did you come back to the  
 6 apartment?  
 7 A. We went back to the apartment.  
 8 Q. Okay. And then there came a time after  
 9 you came back from sightseeing that you left the  
 10 apartment a second time?  
 11 A. Yes.  
 12 Q. And that was for what purpose?  
 13 A. We went to Angelo's.  
 14 Q. Okay. And how did you get to Angelo's?  
 15 A. We got to Angelo's in a taxi.  
 16 Q. A taxi?  
 17 A. Uh-huh.  
 18 Q. And that was about what time?  
 19 A. Oh, jeez, maybe, maybe 9:00.  
 20 Q. Between the time -- what time did you go  
 21 looking at Grand Central Station?  
 22 A. That was before 9:00.  
 23 Q. Okay. And do you remember, do you recall  
 24 that evening an individual by name of Martin  
 25 Krouner?

1 A. I don't have any business cards. I don't --  
 2 Q. Well, I don't -- you may want to be  
 3 careful here. I don't want to trick you. I am not  
 4 playing semantics. Did either you or [REDACTED] give him  
 5 a business card?  
 6 MR. EDWARDS: Object to the form.  
 7 THE WITNESS: Not that I recall, no, sir.  
 8 We had a few drinks and, and we were off to our  
 9 flight.  
 10 BY MR. LUTTIER:  
 11 Q. And then you flew to New York and you took  
 12 a cab and you went to this apartment that's located  
 13 at [REDACTED] in New York; is that right? That  
 14 would be the corner of [REDACTED] and [REDACTED] Street?  
 15 A. [REDACTED] rings a bell.  
 16 That's where we stayed?  
 17 Q. Yeah.  
 18 A. Yeah.  
 19 Q. Now, on that evening, the first night that  
 20 you got there on Tuesday, I think earlier you said  
 21 you-all walked down a street and went to dinner; is  
 22 that right?  
 23 A. We walked down the street and we walked into  
 24 a, I think it's Grand Central Station. I'm not sure  
 25 because I'm not from there and we looked around. Yeah.

1 A. Do I know a man named Martin?  
 2 Q. Uh-huh, Martin Krouner.  
 3 A. No.  
 4 Q. Do you remember getting in a black  
 5 Series 5 BMW when you came out of the condominium?  
 6 A. We, we did take a ride with a man.  
 7 Q. Well, I thought you just told me you  
 8 walked to the restaurant.  
 9 A. No, I told you I took a cab to the restaurant.  
 10 Q. Oh, took a cab to the restaurant?  
 11 A. Yes.  
 12 Q. Did you forget about getting in a car with  
 13 this man?  
 14 A. He took us a little sightseeing. No, I did  
 15 not forget about that.  
 16 Q. Was that before dinner?  
 17 A. That was before dinner, yes.  
 18 Q. Did you just fail to mention that or --  
 19 this is different than the man who took you  
 20 sightseeing later, isn't it?  
 21 A. Yes.  
 22 Q. Okay. So, tell me who Martin Krouner is.  
 23 A. I don't know his name, if that is his name.  
 24 Q. Well, the guy that picked up in the black  
 25 BMW, who's he?

6 (Pages 519 to 522)

1 A. I guess a friend of Anna's.  
 2 Q. Well, tell us how old this individual was.  
 3 Describe him for us.  
 4 A. He has not a lot of hair. He's about five-six  
 5 maybe and a little chubby.  
 6 Q. For what purpose were you -- and you never  
 7 met him before?  
 8 A. No.  
 9 Q. [REDACTED] never met him before?  
 10 A. No.  
 11 Q. You didn't have any idea who he was?  
 12 A. No.  
 13 Q. You-all climbed in his car?  
 14 A. Yeah, I think it was Anna's friend.  
 15 Q. Okay. What did Anna tell you about the  
 16 guy?  
 17 A. She's Chinese. She's like go, go; go, go have  
 18 fun, go search the town.  
 19 Q. So, where did you go with Martin?  
 20 A. We ended up meeting him at Angelo's.  
 21 Q. Wait a minute. You got -- first of all  
 22 you got in Martin's car, right?  
 23 A. I got into Martin's car, yes.  
 24 Q. And then where did you go once you got in  
 25 Martin's car?

1 A. We searched around the town.  
 2 Q. What do you mean you searched around?  
 3 A. We went sightseeing.  
 4 Q. Okay. Do you remember where you went?  
 5 A. And we went sightseeing.  
 6 Q. Do you remember where you want  
 7 sightseeing?  
 8 A. Then we took a taxi. No, because I don't know  
 9 the area.  
 10 Q. You went sightseeing in Mr. Kroner's car,  
 11 correct?  
 12 A. Yes.  
 13 Q. All right. And, and did there come a time  
 14 that you got of Mr. Kroner's car?  
 15 A. Yeah, and we looked around. It was flurring  
 16 outside, so it was nice to feel the snow.  
 17 Q. And where did you get out of the car?  
 18 A. Sir, I don't know New York. I don't --  
 19 Q. Well, was it at a restaurant? Was it at  
 20 the pool? Was it back at the condo? Where was it?  
 21 A. It was near a whole bunch of buildings.  
 22 Q. By the way, did you take any pictures  
 23 while you were up there?  
 24 A. I did take pictures.  
 25 Q. Take a picture of you and [REDACTED] and this

1 fellow here, Mr. Martin Krouner?  
 2 A. If that's his name. I don't know if we took a  
 3 picture of him, but we definitely took pictures of [REDACTED]  
 4 and I.  
 5 Q. And, and where did you take those  
 6 pictures?  
 7 A. Wherever we were.  
 8 Q. Okay. And when this man brought you back,  
 9 did he go to dinner with you?  
 10 A. He ended up meeting us there, yes.  
 11 Q. Did he drop you at the restaurant?  
 12 A. He dropped us near so we can get there with a  
 13 taxi. He dropped us somewhere off of the street and we  
 14 went with a taxi.  
 15 Q. So, he dropped you off and then you got a  
 16 taxi to get there?  
 17 A. To go to Angelo's, yeah.  
 18 Q. And then he met you there later?  
 19 A. Later on.  
 20 Q. Okay. About what time?  
 21 A. Oh, God, I don't know the times. Maybe this  
 22 was around, maybe around -- I'm -- this is total  
 23 ballpark, like 10 maybe.  
 24 Q. Okay. And, and, and then after dinner  
 25 what did you and [REDACTED] and he do?

1 A. Well, we took a taxi back to his car. And we  
 2 went up to the, we went up to Anna's room and he just --  
 3 we just said bye.  
 4 Q. And did you receive anything at all of  
 5 value from this man?  
 6 A. No.  
 7 Q. Did you charge him anything?  
 8 A. No.  
 9 Q. Were you paid anything for the time you  
 10 spent with him?  
 11 A. No.  
 12 Q. Now, who's Robert Fredrick Burke?  
 13 A. Robert Fredrick Burke, I have no idea.  
 14 Q. Well, on the next day on Wednesday,  
 15 February 3rd, did you go sightseeing again?  
 16 A. Yes, we did.  
 17 Q. And you said that this fellow Bobby came  
 18 to see you at the apartment sometime the morning of  
 19 Wednesday, February 3rd?  
 20 A. He came to see us, uh-huh. I'm not sure what  
 21 time it was. I think it was around in the afternoon.  
 22 Q. Okay. And then after he left, you and  
 23 [REDACTED] did some more sightseeing?  
 24 A. Yeah, we walked around town.  
 25 Q. Do you remember getting in a vehicle with

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1 somebody that night?  
 2 A. Yes.  
 3 Q. Who did you get in a vehicle with?  
 4 A. I told you, I don't know his name.  
 5 Q. Well, where did you, where did you meet  
 6 this person?  
 7 A. Everybody was Anna's friend. Anna has a lot  
 8 of friends.  
 9 Q. Well, what did you know about the person?  
 10 A. Nothing.  
 11 Q. How old is the person?  
 12 A. I told you, I don't know anything about him.  
 13 Q. And what kind of vehicle did you get in?  
 14 A. I don't even know the vehicle.  
 15 Q. Toyota Highlander?  
 16 A. Is it -- I don't know.  
 17 Q. And what nationality is this individual?  
 18 A. I have no idea.  
 19 Q. And where did this individual take you?  
 20 A. He took us to sightseeing and he took us to  
 21 the Statue of Liberty, everywhere.  
 22 Q. Did you receive anything of value from  
 23 him?  
 24 A. No.  
 25 Q. Did you charge him anything?

1 A. I have no idea.  
 2 Q. Were they a male's clothes or female's  
 3 clothes?  
 4 A. I didn't search through the garbage. I just  
 5 know that I threw out the trash.  
 6 Q. So you're telling me you don't know whose  
 7 they were?  
 8 A. No.  
 9 Q. Okay. Do you know [REDACTED]?  
 10 A. Yes, I do.  
 11 Q. And how do you know [REDACTED]?  
 12 A. We grew up together. Probably knew her since  
 13 I was 12.  
 14 Q. Have you ever been engaged in any kind of  
 15 a business venture, regardless of whether it was a  
 16 formally formed business venture like a corporation,  
 17 but any kind of business venture with [REDACTED]?  
 18 A. I went, we went to Jeffrey's together.  
 19 Q. Any other kind of business venture, you  
 20 and her?  
 21 A. No.  
 22 Q. Were you ever, did you ever represent or  
 23 attempt to start a business venture with her?  
 24 A. This is years ago.  
 25 Q. How many years ago?

1 A. No.  
 2 Q. You or [REDACTED]?  
 3 A. I did not charge him anything.  
 4 Q. How about [REDACTED]?  
 5 A. I don't know what she does but, no, I don't  
 6 think so.  
 7 Q. Well, was there ever a time that you and  
 8 [REDACTED] were not together in this person's presence?  
 9 A. Other than me going to the restroom, no. We,  
 10 I, we were pretty much together the whole time.  
 11 Q. On the evening of February 3rd, 2010, do  
 12 you recall throwing a bag of trash in the garbage?  
 13 MR. EDWARDS: What date is that?  
 14 MR. LUTTIER: The evening of February 3rd,  
 15 2010, at approximately 9:00 p.m.  
 16 THE WITNESS: In the evening.  
 17 MR. LUTTIER: Just before you got in the  
 18 Toyota Highlander.  
 19 THE WITNESS: Yes, we did.  
 20 BY MR. LUTTIER:  
 21 Q. Okay. And do you recall what it was that  
 22 was in that bag?  
 23 A. There was whole bunch of clothes and  
 24 everything that Anna did not want, so we threw it out.  
 25 Q. And whose clothes were those?

1 A. Well, 13, 14, 15, like eight years ago.  
 2 Q. Okay. So, this is 2010. We're talking  
 3 about 2002?  
 4 A. Yeah.  
 5 Q. Okay. So tell us about the venture that  
 6 you were forming with her?  
 7 A. I don't know what you're talking about.  
 8 Q. Well, you were thinking about something  
 9 because you said years ago. You were the one that  
 10 picked the date. So, what was it you were thinking  
 11 about?  
 12 A. No, I said years ago we, we knew each other.  
 13 We used to hang out. Like we used to do little girl  
 14 stuff, go in the pool and --  
 15 Q. No, my question was, was there a business  
 16 venture and you said it was years ago.  
 17 A. It was years ago that I've known her. Any  
 18 type of business venture, not that I recall.  
 19 Q. Have you ever told anyone at all that you  
 20 and [REDACTED] were forming a business venture or had a  
 21 business venture?  
 22 A. At 12, no, I don't --  
 23 Q. At any, I don't care, right up until  
 24 today.  
 25 A. No. [REDACTED].?

1 Q. Did you ever have any sort of a business  
 2 venture that involved in any way, shape, or form you  
 3 and/or her taking showers?  
 4 A. No.  
 5 Q. Did you ever tell anybody you did?  
 6 A. No.  
 7 Q. Did you ever have any literature or  
 8 written material describing such a venture?  
 9 A. Not that I recall, sir.  
 10 Q. Ever have anything that described such a  
 11 venture or any costs associated with procuring those  
 12 services if someone wanted to do that?  
 13 A. Taking showers?  
 14 Q. Well, taking showers or watching the two  
 15 of you take showers or any combination or  
 16 permutation that you can think of.  
 17 A. Not that I can think of unless we were like  
 18 stupid little girls who -- I don't recall anything about  
 19 any shower or anything like that, no.  
 20 Q. Did you ever tell anybody that you had  
 21 such a business going?  
 22 A. No.  
 23 Q. Did you ever tell anybody you had such a  
 24 business going with someone other than [REDACTED]?  
 25 A. A business going, no.

1 Q. I don't mean a formal thing. Did you ever  
 2 tell anybody that you were involved in any kind of  
 3 activity involving taking showers for which you got  
 4 paid money?  
 5 A. Definitely not. I don't -- I have never.  
 6 Q. And when was the last time you talked to  
 7 [REDACTED]?  
 8 A. Oh, boy. It's been years. Ballpark three  
 9 years maybe.  
 10 Q. And where did you talk to her three years  
 11 ago?  
 12 A. At the trailer that I had my son at.  
 13 Q. Now, your other friend, [REDACTED] --  
 14 A. Uh-huh.  
 15 Q. -- when is the first time that you can  
 16 recall having done any type of a drug with [REDACTED]?  
 17 A. When we first started seeing Jeffrey we tried  
 18 to numb each other with like downers, you know,  
 19 Percocets or something just to ignore really what was  
 20 going on between Jeffrey and us.  
 21 Q. Well, at the last deposition you told us  
 22 that [REDACTED], that [REDACTED], a person known as [REDACTED],  
 23 who we know to be [REDACTED], first took you  
 24 to Jeffrey's. Do you recall that testimony?  
 25 A. Yes.

1 Q. And you testified that she provided you  
 2 with drugs?  
 3 A. Yes.  
 4 Q. All right. Now, who provided the drugs to  
 5 [REDACTED]?  
 6 A. I have no clue.  
 7 Q. Well, who provided the drugs to you that  
 8 you just claim you took when you were with [REDACTED]?  
 9 A. I couldn't even say. Maybe, maybe [REDACTED].  
 10 Q. That's your boyfriend?  
 11 A. At the time he was my boyfriend.  
 12 Q. Well, he was your boyfriend. He became  
 13 the father of your child, right?  
 14 A. Yes.  
 15 Q. Okay. I mean, that would qualify as a  
 16 boyfriend, right?  
 17 A. If that's what you call it.  
 18 Q. He was a drug dealer, wasn't he?  
 19 A. No.  
 20 MR. EDWARDS: Form.  
 21 BY MR. LUTTIER:  
 22 Q. Did he provide drugs to you on more than  
 23 one occasion?  
 24 A. No, he, no, he, if anything, him and his  
 25

1 friends got together and they were stupid and young and  
 2 they did a couple of drugs, but I didn't want anything  
 3 to do with them until I met Jeffrey. And then I wanted  
 4 to numb myself to be around Jeffrey. And I know that I  
 5 would take drugs from him occasionally.  
 6 But he didn't like give them to me or sell  
 7 them to me or anything like that.  
 8 Q. Well, what did you do, go steal them from  
 9 him or what?  
 10 A. I would probably take him from his stash or  
 11 something but --  
 12 Q. So, he had a lot of drugs?  
 13 A. No, not that I remember. I don't know where I  
 14 got these drugs from. To tell you the truth, I really  
 15 don't recall. I don't know if [REDACTED] brought them. I  
 16 don't know if I brought them.  
 17 Q. Well, did you give these drugs to [REDACTED]?  
 18 A. No, not that I recall.  
 19 Q. One thing you knew was that these were  
 20 illegal drugs, right?  
 21 A. Yes.  
 22 Q. You knew it was against the law what you  
 23 were doing?  
 24 A. Yes, especially -- Jeffrey Epstein knew it was  
 25 against the law to be fondling 13 and 14-year-old girls

1 too.  
 2 MR. LUTTIER: Well, Jeffrey Epstein --  
 3 move to strike as not responsive.  
 4 BY MR. LUTTIER:  
 5 Q. What Jeffrey Epstein told you was that you  
 6 shouldn't drink and shouldn't do drugs, didn't he?  
 7 A. He told me that he never drank or did drugs.  
 8 He was so interested in what kind of drugs we were on.  
 9 Q. So, notwithstanding what you knew to be  
 10 clearly --  
 11 A. He would ask, he would be asking us so how  
 12 does [REDACTED] make you feel, how does coke make you feel,  
 13 how does Percocets make you feel, how does this make you  
 14 feel.  
 15 Q. He never asked you to take any of those  
 16 drugs, did he?  
 17 A. No, but he would --  
 18 Q. He never gave you any of those drugs, did  
 19 he?  
 20 A. No.  
 21 Q. And you claim he had all this money. He  
 22 could have provided you with any drug he wanted if  
 23 he wanted to give you a drug, couldn't he?  
 24 A. I guess.  
 25 Q. And he never provided you with one single

1 A. Probably.  
 2 Q. Now, you remember going there with  
 3 [REDACTED] don't you?  
 4 A. Yes, I do.  
 5 Q. Two occasions you went and she went in the  
 6 room with you, didn't she?  
 7 A. She went in the room with me at the beginning,  
 8 at the first time, yes.  
 9 Q. Went in the room the second time too,  
 10 didn't she?  
 11 A. I, I think so. I'm not sure about that.  
 12 Q. Are you aware that --  
 13 A. I bet you have pictures on that, huh.  
 14 Q. Are you aware that [REDACTED] been deposed?  
 15 A. Have been what?  
 16 Q. Has been deposed, gone through the same  
 17 process you are?  
 18 A. Oh, yes, of course. She should be.  
 19 Q. How are you aware of that fact?  
 20 A. Excuse me?  
 21 Q. How are you aware of that fact?  
 22 A. Everybody's been deposed. Most all, most of  
 23 all these girls have been deposed.  
 24 Q. Who told you that?  
 25 A. You know, the girls talk.

1 illegal drug and told you he never touched drugs?  
 2 A. No, but that's not his crime. He fondled me  
 3 when I was 13 years old. He didn't sell me drugs.  
 4 Sorry, he just molested me.  
 5 MR. LUTTIER: Move to strike.  
 6 BY MR. LUTTIER:  
 7 Q. He never provided you with one illegal  
 8 drug, did he?  
 9 A. No.  
 10 Q. You went and got those all on your own?  
 11 A. Yes.  
 12 Q. You and your friends would go and take all  
 13 kinds of illegal drugs?  
 14 A. Yes, because I was scared to be around an old  
 15 man when he is touching my vagina and masturbating with  
 16 his cock in front me ejaculating all over himself, so  
 17 yes, I would, I think you would take drugs too.  
 18 Q. So, were you so scared that you said I'm  
 19 not going anymore?  
 20 A. He was like our master. He's like [REDACTED]  
 21 [REDACTED] master. He does, anything he says, we do  
 22 because we are intimidated by him. We were scared of  
 23 him.  
 24 Q. So, if he said run out in front of  
 25 traffic, you would?

1 Q. Okay.  
 2 A. It get's around town and it's in the newspaper  
 3 every weekend, so how can you not know?  
 4 Q. Did you talk to [REDACTED]?  
 5 A. No, I did not.  
 6 Q. Okay. So, how did you know [REDACTED] had  
 7 been deposed if she was deposed?  
 8 MR. EDWARDS: Object to the form to the  
 9 extent --  
 10 THE WITNESS: Of course she's been  
 11 deposed.  
 12 MR. EDWARDS: Hold on. Hold on -- to the  
 13 extent that you're asking for attorney-client  
 14 privilege information which you did --  
 15 MR. LUTTIER: No.  
 16 MR. EDWARDS: -- in the first deposition  
 17 and it sounds like you're going there again --  
 18 MR. LUTTIER: I don't want to know  
 19 anything your lawyer said.  
 20 MR. EDWARDS: -- about talking to my  
 21 client.  
 22 BY MR. LUTTIER:  
 23 Q. I don't want to know anything your lawyer  
 24 said. Have you seen a transcript of [REDACTED]  
 25 deposition?

1 MR. EDWARDS: Object to the form. If she  
2 has seen a transcript, that would obviously  
3 being something that her attorney has shown  
4 her. That is not something she would have seen  
5 independent of that. So that would be  
6 protected information.

7 MR. LUTTIER: I, I mean, I don't think --  
8 I think if you show her a copy of a deposition,  
9 that is not protected by attorney-client  
10 privilege. If you had a discussion with her, I  
11 agree with you, whatever your discussions were.  
12 But the fact that you showed her the transcript  
13 I don't think is protected by the privilege.

14 BY MR. LUTTIER:

15 Q. Have you ever seen a copy of the  
16 transcript of [REDACTED] deposition?

17 A. Not that I know of.

18 Q. Well, did you know that -- or strike that.  
19 When you and [REDACTED]  
20 [REDACTED] were with Mr. Epstein on the second  
21 occasion when she took you there, isn't it true that  
22 you began a conversation with Jeffrey discussing  
23 what you and your mother did and how much you  
24 charged for various things?

25 A. False.

1 A. Am I religious?

2 Q. No, do you have a religious affiliation?

3 Are you associated with a particular faith?

4 A. Yes.

5 Q. Protestant, Catholic, Jewish?

6 A. Yes, I am.

7 Q. What faith would that be?

8 A. I believer in Jesus Christ.

9 Q. Any particular organized -- do you know  
10 what I mean by organized religion? There's, there's  
11 a bunch --

12 A. I would like to call myself a Christian but I  
13 believe that the Lord, Catholics, Jews, Buddhism, it  
14 doesn't matter because it shouldn't be judged. It  
15 shouldn't be organized. The Lord doesn't -- the Lord  
16 doesn't organize anything. I just know that I am, I am  
17 very spiritual and I do love the Lord very much.

18 Q. Okay. So you would characterize yourself  
19 just as a, for lack of a better term Christian?

20 A. I am very spiritual.

21 Q. Okay.

22 A. And I pray every day.

23 Q. Do, do you participate in an organized  
24 religion?

25 A. Do I go to church?

1 Q. Sexual nature.

2 A. No.

3 Q. Is there any reason why [REDACTED]  
4 would want to make that story up?

5 MR. EDWARDS: Object to the form.

6 THE WITNESS: I have no idea.

7 BY MR. LUTTIER:

8 Q. And isn't it true that when you began --

9 A. She knew Jeffrey more than I did.

10 Q. Well, didn't --

11 A. This is the first time or second time I had  
12 ever been with Jeffrey. I didn't tell him anything;  
13 only the questions he asked me.

14 Q. And, and isn't it true that when you began  
15 to talk to Mr. Epstein and discuss with him what you  
16 and your mom did and the prices you would charge for  
17 things that Mr. Epstein asked Ms. [REDACTED] to leave  
18 the room?

19 A. I don't even know why my mother is brought up  
20 in this because, no, I would never talk about my mother  
21 as being a prostitute. She did not raise me like that.  
22 My mother is a very beautiful person inside and out and  
23 she would never raise me like that.

24 Q. By the way, what is your -- do you have a  
25 religious affiliation?

1 Q. Yeah.

2 A. Yes.

3 Q. And where did you go?

4 A. I've been to Christ Fellowship. I've been to  
5 First Baptist.

6 Q. When was the last time you were at Christ  
7 Fellowship?

8 A. In December '08.

9 Q. And where did you go, for Christmas?

10 A. Before Christmas.

11 Q. Okay. And when was the last time you were  
12 at First Baptist?

13 A. Maybe September '08.

14 Q. Okay. Are you members of either of those  
15 churches or you just went to them?

16 A. If you want to call me a member, I --

17 Q. Are you a registered in them?

18 A. -- I attend, I attend Christ Fellowship, yes.

19 Q. Do you attend it with some degree of  
20 regularity?

21 A. Yes.

22 Q. And how often?

23 A. As often as I can.

24 Q. Okay. Well, I mean, I don't want to pin  
25 you down to a specific number of days, but how many

1 days a month would you say on average you go?  
 2 A. As of right now, one, unfortunately.  
 3 Q. And when you say unfortunately, are you  
 4 unable to go more days?  
 5 A. No, I would love to go more days.  
 6 Q. Okay. Was there something that prevents  
 7 you from going more days?  
 8 A. I have a busy life.  
 9 Q. Okay. What is it that you're doing that  
 10 prevents you from going more days.  
 11 A. Well, I am trying to get my son enrolled into  
 12 Christian school, and there's a lot of bills that need  
 13 to be paid and things that need to be done, errands that  
 14 need to be ran, clothes that need to be washed, food  
 15 that needs to be bought, time I need to spend with my  
 16 son.  
 17 Q. So, it's errands and clothes, laundry,  
 18 purchasing groceries and stuff, and time with your  
 19 son that prevents you from being able to attend more  
 20 frequently; is that right?  
 21 MR. EDWARDS: Object to the form.  
 22 THE WITNESS: Sure.  
 23 BY MR. LUTTIER:  
 24 Q. You set your own work hours, right?  
 25 A. Yes.

1 Q. Your mother is [REDACTED], and I may get  
 2 this name sort of, [REDACTED] is it?  
 3 A. Yeah.  
 4 Q. Did I pronounce it right?  
 5 A. No.  
 6 Q. How you do pronounce that?  
 7 A. [REDACTED].  
 8 Q. [REDACTED]. And is she currently married?  
 9 A. No. Can I have a tissue?  
 10 Q. And where does she currently live?  
 11 A. In Palm Beach Gardens.  
 12 Q. In what development?  
 13 A. I don't know what the development's called.  
 14 MR. EDWARDS: Can we take a split second  
 15 break to take grab a tissue?  
 16 MR. LUTTIER: Sure.  
 17 MR. EDWARDS: I don't see one right now.  
 18 THE VIDEOGRAPHER: Going off the record at  
 19 2:28 p.m.  
 20 (A brief recess was held.)  
 21 THE VIDEOGRAPHER: We're back on the  
 22 record at 2:32 p.m.  
 23 BY MR. LUTTIER:  
 24 Q. Okay. You're saying you don't know the  
 25 development that she lives in Palm Beach Gardens?

1 A. You guys have been there before. You should  
 2 know.  
 3 Q. It's the same house she's always lived in?  
 4 A. No. She hasn't lived there her whole life.  
 5 Q. Okay. But I mean while you were a kid,  
 6 when, when you were living with her; is it the same  
 7 place that she lived in?  
 8 A. No.  
 9 Q. How long has she been living where she is  
 10 now?  
 11 A. I don't know. There's been a couple of years  
 12 that my mother and I haven't talked.  
 13 Q. Well, when was the last time you talked to  
 14 your mother?  
 15 A. Today.  
 16 Q. And, and when did you talk to her?  
 17 A. This morning.  
 18 Q. And why did you talk to her this morning?  
 19 A. So she could pray with me over the phone.  
 20 Q. And when was the last time you talked to  
 21 her prior to this morning?  
 22 A. Last night.  
 23 Q. Did I misunderstand? I thought you said  
 24 there was a --  
 25 A. There was a period in my life that we didn't

1 talk.  
 2 Q. Okay. So that's some past period of time?  
 3 A. Yes.  
 4 Q. When did that change?  
 5 A. Around May '09.  
 6 Q. And what is it that caused the change in  
 7 May of '09?  
 8 A. I was living my life and she was living hers.  
 9 Q. What does that mean?  
 10 A. I was living my life and she was living hers.  
 11 Q. Okay. Why did that, why did that  
 12 facilitate --  
 13 A. She was taking care of my sister that has  
 14 diabetes and they were going through a lot, so I left it  
 15 alone.  
 16 Q. My question was what caused in May of '09  
 17 this period of estrangement between you and your  
 18 mother to end?  
 19 A. I just told you.  
 20 Q. You said that your mother --  
 21 A. My mother and I, she had -- my mother was  
 22 taking care of my sister who has severe diabetes.  
 23 Q. That's [REDACTED]?  
 24 A. Yes.  
 25 Q. Okay. You mean during your period of

1 estrangement?  
 2 A. Yes.  
 3 Q. Okay. So, you didn't communicate with her  
 4 because she was taking care of your sister?  
 5 A. Yes.  
 6 Q. Did something happen in May of '09 that  
 7 changed all that?  
 8 A. My sister moved away.  
 9 Q. And where did she go to?  
 10 A. Orlando.  
 11 Q. And, and when she moved, did she go with a  
 12 boyfriend?  
 13 A. Yes.  
 14 Q. And who is that?  
 15 A. His name is David.  
 16 Q. Do you know his last name?  
 17 A. No.  
 18 Q. And she's still living in Orlando?  
 19 A. Yes.  
 20 Q. Now, what's the relationship between you  
 21 and your sister [REDACTED]?  
 22 A. She's, she has like -- she's a little slow, so  
 23 we can't really relate but other than that I love her.  
 24 Q. Well, haven't you in the past been violent  
 25 toward your sister?

1 A. Excuse me?  
 2 Q. Did your mother ever discuss with you  
 3 whether she had any conversations about you with  
 4 anybody else with respect to this lawsuit?  
 5 MR. EDWARDS: Is this in addition or  
 6 different than the previous discussion that was  
 7 discussed at the first deposition?  
 8 MR. LUTTIER: I won't know until she  
 9 answers it.  
 10 MR. EDWARDS: But is this a separate  
 11 occurrence from what she was asked at the last  
 12 deposition?  
 13 THE WITNESS: No, she's never discussed  
 14 anything else with anyone else, no.  
 15 BY MR. LUTTIER:  
 16 Q. Okay.  
 17 A. Not to my knowledge.  
 18 Q. And if your mother told anybody that  
 19 historically as a child you used Xanax, would she be  
 20 telling the truth?  
 21 A. Yes.  
 22 Q. Do you who [REDACTED] is?  
 23 A. Yes, I do.  
 24 Q. And who is that?  
 25 A. Her current boyfriend.

1 A. Yeah.  
 2 Q. And tell us exactly what you did to your  
 3 sister.  
 4 A. Well, when I was 14, 15, 14, I was like  
 5 mentally abusive to her because I guess I was just  
 6 taking out everything, all of my pain from what was  
 7 going on with Jeffrey, and I would just take it out all  
 8 on her.  
 9 Q. What do you mean by you would take it out  
 10 on her?  
 11 A. I was mentally abusive to her.  
 12 Q. Well, describe what it is you actually  
 13 did.  
 14 A. She stuttered; I would make fun of her. She  
 15 has diabetes; I wouldn't respect it.  
 16 Q. And did your sister actually have to get a  
 17 restraining order against you?  
 18 A. No.  
 19 Q. Did your sister ever get a restraining  
 20 order against you?  
 21 A. Not that I know of. She's slow. She's not  
 22 all there. She has like part autism.  
 23 Q. Now, did your mother discuss with you  
 24 about whether she ever had any discussions about you  
 25 with anybody else?

1 Q. And do you believe him to be a truthful  
 2 individual?  
 3 A. Yes.  
 4 Q. And how long has he known your mother?  
 5 A. For 15 years.  
 6 Q. Do you know of anything he has told  
 7 anybody else about what it is your mother used to do  
 8 for a living?  
 9 A. No.  
 10 Q. Is the first time that you've heard any  
 11 reference to your mother being a prostitute in this  
 12 case?  
 13 A. No.  
 14 Q. When else have you heard that?  
 15 A. I have never heard that my mother was a  
 16 prostitute.  
 17 Q. So, what I am saying is, is the first time  
 18 that you have heard that issue even come up in this  
 19 case?  
 20 A. This is the first time I am hearing this, yes.  
 21 Q. Did you discuss with your mother the  
 22 activities you were engaging in with Mr. Epstein at  
 23 the time that you were engaging in them?  
 24 A. I kept everything a secret until years later  
 25 when after I had my son and then I told her what went

13 (Pages 547 to 550)

1 on.

2 Q. Earlier you said at 15 you worked for  
3 Jamie's photo studio?

4 A. Yes.

5 Q. And my notes are unclear. I believe I  
6 asked you, did you tell them how old you were. Do  
7 you remember me asking you that question?

8 A. (Witness nods head).

9 Q. And what did you respond?

10 A. I told them I was 19.

11 Q. Okay. Did you provide them with any kind  
12 of proof?

13 A. No.

14 Q. And why did you lie to them and tell them  
15 you were 19 if you were really 15?

16 A. Because I wouldn't be able to work there.

17 Q. Did you tell other people that you were  
18 older than you really were?

19 A. Yes.

20 Q. Who else did you tell you were older than  
21 you really were?

22 A. Probably everybody I came across.

23 Q. So, that would be many people?

24 A. Yes.

25 Q. All of the various adult entertainment

1 THE WITNESS: I worked at Jamie's photo  
2 studio. Once I turned 18, I told everybody my  
3 age.

4 BY MR. LUTTIER:

5 Q. Well, you worked at a place called Cabaret  
6 when you were 14, didn't you?

7 A. Curves Cabaret. I told them I was 19 as well.

8 Q. When you were how old, 14?

9 A. Yes.

10 Q. Okay. And then what, what was the next  
11 place you did, you went to do topless dancing?

12 We'll do jack shacks separate from topless dancing.

13 A. I don't know. I worked at Curves Cabaret when  
14 I was 14. I worked at Jamie's photo studio when I was  
15 15, and I worked for Jeffrey throughout all those years.

16 Q. You worked for a lot of other places  
17 besides Jamie's photo studio and Curves Cabaret,  
18 didn't you?

19 A. Not when I 15.

20 Q. Well, I want to start there and keep on  
21 going.

22 A. We already know the places I've worked at.  
23 We've been through this. We've went through this for  
24 the last deposition.

25 Q. That's why --

1 places you worked at. The places, the topless bars  
2 you worked at, did you tell all of them you were  
3 older than you really were?

4 A. The period of time when I worked at Jamie's  
5 photo studio, I told everyone I was 19. Jeffrey knew  
6 how old I was. And Jeffrey new how old every girl I  
7 brought there was, and he wanted young girls all the  
8 time.

9 Q. Does that have anything to do with the  
10 question that I asked?

11 MR. LUTTIER: I move to strike.

12 THE WITNESS: The question you asked has  
13 nothing do with Jeffrey.

14 MR. LUTTIER: Let's, let's go back. If  
15 you will read the question that I asked. If  
16 you will listen to this question, that's the  
17 one I would like you to answer.

18 THE WITNESS: I know you guys love to get  
19 paid but --

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

22 THE WITNESS: At what period of time?

23 MR. LUTTIER: At any time. From the time  
24 you first worked at one to the last time you  
25 worked.

1 A. And we've already been through this for this  
2 deposition.

3 Q. -- I am giving you the chance to  
4 summarize, so let's just go down and --

5 A. You already know the places I worked.

6 Q. I am asking you as to each one, how old  
7 you told them you were.

8 A. When I was underage, I told them I was 19  
9 years old.

10 Q. Every place that you worked?

11 A. Yes. Except Jeffrey's, Jeffrey knew that I  
12 was 13. I'm sick of this.

13 Q. So, at Abby's you told them 19. Is that  
14 just the number you picked?

15 A. On advice of counsel I am invoking my Fifth  
16 Amendment rights under the United States constitution.

17 MR. EDWARDS: Do you want to take a break  
18 or are you all right?

19 MR. LUTTIER: Yeah, do you want to take a  
20 break?

21 THE WITNESS: No. I want to get this done  
22 and over with. I am sick of it. Jeffrey is --  
23 it's disgusting.

24 BY MR. LUTTIER:

25 Q. Flirts you told them you were 19?

1 A. I was -- on advice of counsel, I am invoking  
 2 my Fifth Amendment rights under the United States  
 3 Constitution.  
 4 Q. Lannie's, whatever, Laurie's, whatever it  
 5 was, you told them you were 19?  
 6 A. Lauren's.  
 7 Q. Lauren's, whatever.  
 8 A. I was of age.  
 9 Q. Okay. How about when you were at Pure  
 10 Platinum, were you of age then?  
 11 A. Pure Platinum.  
 12 Q. Platinum Showgirls?  
 13 A. Yes, I was of age.  
 14 Q. And how about Elegance Day Spa, were you  
 15 of age then?  
 16 A. On advice of counsel I invoke my Fifth  
 17 Amendment rights under the United States Constitution.  
 18 Q. Did you work at Elegance Day Spa?  
 19 A. On advice of council I'm invoking my Fifth  
 20 Amendment rights under the United States Constitution.  
 21 Q. And what work did you do at Elegance Day  
 22 Spa?  
 23 A. I'm over this shit.  
 24 MR. EDWARDS: Let's take a break.  
 25 THE WITNESS: No. On advice of counsel I

1 a--  
 2 A. Yes.  
 3 Q. -- store?  
 4 A. Yes.  
 5 Q. And that was upsetting to you?  
 6 A. Yes.  
 7 Q. Why was it upsetting to you?  
 8 A. I was trying to say hello to my little sister  
 9 who was three at the time. And [REDACTED] was mad at my  
 10 father and she didn't want me talking to my little  
 11 sister. So, she doesn't know the American rights  
 12 because she's from Mexico and she totally mazed me when  
 13 I was trying to hug my little sister.  
 14 (Mr. Goldberger entered the deposition  
 15 room.)  
 16 THE WITNESS: I just hope Jeffrey gets  
 17 what he deserves.  
 18 BY MR. LUTTIER:  
 19 Q. And what's that, Ma'am?  
 20 A. Punishment for putting us girls through all  
 21 this.  
 22 Q. That is those things that you are talking  
 23 about the times that you elected to go back to his  
 24 house and get paid to give him massages?  
 25 A. He demanded us to over the phone, sir.

1 am invoking my Fifth Amendment rights under the  
 2 United States Constitution.  
 3 BY MR. LUTTIER:  
 4 Q. Are you fearful that you're going to be  
 5 prosecuted for something about Elegance Day Spa?  
 6 A. No.  
 7 Q. So, well then, what are you asserting the  
 8 Fifth Amendment for?  
 9 A. Because I want to.  
 10 Q. Because what?  
 11 A. Because I want to.  
 12 MR. EDWARDS: Listen, don't engage with  
 13 him. Just read.  
 14 BY MR. LUTTIER:  
 15 Q. Do you know [REDACTED]  
 16 (phonetic).  
 17 A. I know a [REDACTED].  
 18 Q. Okay. And who is that?  
 19 A. My step-mother.  
 20 Q. Married to your father, [REDACTED]?  
 21 A. Yes, sir.  
 22 Q. And have you had a confrontation with her?  
 23 A. What kind of confrontation is this now?  
 24 Q. Did you ever have a confrontation with  
 25 her, a physical confrontation in the parking lot of

1 Q. But nobody made you do it, right?  
 2 A. No. But Jeffrey demanded us for us to do it.  
 3 And as young girls we were scared of Jeffrey. And you  
 4 know what, he will get what he deserves.  
 5 Q. Let's see. You lived out Okeechobee by  
 6 Drexel Road?  
 7 A. Yes, I did.  
 8 Q. He lived in Palm Beach?  
 9 A. Yes.  
 10 Q. How many miles was it, would you say  
 11 between those two houses?  
 12 A. I don't know, five, six.  
 13 Q. And you didn't, you didn't have a car  
 14 because you weren't driving, right?  
 15 A. No. He sent taxies to my house to come get  
 16 me.  
 17 Q. So, then you could have said I am not  
 18 getting in any of the taxies you wanted me to. You  
 19 could have said I'm not going, just like a bunch of  
 20 your friends did, right? They said after, boom, I  
 21 don't want to go anymore, right?  
 22 A. I could have said no.  
 23 Q. As a matter of fact you had friends that  
 24 you took, you found them, Jeffrey Epstein didn't  
 25 find them, you found them.

1 A. Yeah. Because he wanted me to find them. He  
 2 said you better find me a girl the next day, or I am not  
 3 going to call you anymore.  
 4 Q. And you took them to Jeffrey Epstein's and  
 5 you told them don't worry, this is what's going to  
 6 happen, it's easy money, right?  
 7 A. Yeah, because I was tried of Jeffrey.  
 8 Q. And some of those girls went one time and  
 9 said they didn't want to go back, right?  
 10 A. Correct. Because they were afraid of Jeffrey.  
 11 Q. And you could have done the same thing,  
 12 couldn't you?  
 13 A. Correct.  
 14 Q. But you wanted the money?  
 15 A. I was a poor little girl who couldn't even  
 16 afford a pair of shoes, yes.  
 17 Q. You wanted the money?  
 18 A. Yes.  
 19 Q. And not only did you want the money but  
 20 you wanted to make money taking other girls there?  
 21 A. Yes.  
 22 Q. Now, you allege in your complaint that's  
 23 the, the pleadings that you have filed in this case,  
 24 that you have suffered physical injury and a bunch  
 25 of other things. What physical injury have you

1 suffered in the past as a result of anything that  
 2 Jeffrey Epstein did?  
 3 A. Stress, my heart, mental damage.  
 4 Q. Any other physical injury?  
 5 A. Besides the red marks he would leave on my  
 6 pussy.  
 7 Q. And how would he do that?  
 8 A. He left red marks on my vagina with his  
 9 fingers, with his vibrator.  
 10 Q. And how did that injure you?  
 11 A. Well, it kind of hurt.  
 12 Q. Did you tell him that?  
 13 A. No. I was scared to tell him anything that he  
 14 didn't want to hear.  
 15 Q. Did you seek medical treatment for that?  
 16 A. No.  
 17 Q. What other physical injury do you allege  
 18 you suffered as a result of anything that Jeffrey  
 19 Epstein did?  
 20 A. Stress, stress, and more stress.  
 21 Q. Anything else?  
 22 A. No.  
 23 Q. Do you allege that -- and I should break  
 24 that down. What physical injuries due you allege  
 25 you suffered in the past other than stress, heart,

1 mental damage, and red marks on you as a result of  
 2 anything that Jeffrey Epstein did, if any?  
 3 A. Physical?  
 4 Q. Yes, physical.  
 5 A. Not mentally --  
 6 Q. I am going to come to that.  
 7 A. -- or psychologically?  
 8 Q. Physical injury.  
 9 A. Physically, well, now I can't -- I am not even  
 10 a normal person anymore. My mentality is totally  
 11 different.  
 12 Q. So, how does that --  
 13 A. I was molested for years.  
 14 Q. How does that physically evidence itself?  
 15 A. I don't know. You tell me. You get molested  
 16 for years and tell me how you feel.  
 17 Q. Well, I'm asking you, you're the one that  
 18 filed the complaint and alleged that you have  
 19 suffered physical injuries in the past. You've told  
 20 us that --  
 21 A. If you're asking me if the guy has ever hit  
 22 me, no.  
 23 Q. No. I am asking you --  
 24 A. Smacked me on my butt a couple times.  
 25 Q. I need to find out what you are alleging

1 so I can defend it. So, what physical injuries, if  
 2 any, other than stress, heart, mental damage and red  
 3 marks?  
 4 MR. EDWARDS: Objection, asked and  
 5 answered.  
 6 BY MR. LUTTIER:  
 7 Q. If there isn't any, fine. If there is I  
 8 want to get them that's all. Do you know of any  
 9 others?  
 10 A. No.  
 11 Q. All right. You allege that you're going  
 12 to suffer in the future physical injury that's  
 13 physical injures that you haven't suffered yet.  
 14 Well, what physical injury do you allege you will  
 15 suffer in the future as a result of anything that  
 16 Jeffrey Epstein did?  
 17 A. Fucking heart attack.  
 18 Q. Heart attack. Anything else?  
 19 A. Mental stress.  
 20 Q. Mental stress. Anything else?  
 21 A. All day, every day. My son is going to suffer  
 22 from it because I'm suffering from it.  
 23 Q. Okay. And you're son is going to suffer  
 24 from what?  
 25 A. He can feel his mother's stress.

1 Q. Any, anything else?  
 2 A. Physically, no.  
 3 Q. All right. Have you obtained any medical  
 4 care or treatment in the past for any physical  
 5 injury that you allege you suffered as a result of  
 6 anything Jeffrey Epstein did?  
 7 A. No. He told me if I tell anyone what is going  
 8 on it's going to be, I'm going to be in trouble. So, I  
 9 would not dare tell anybody what Jeffrey did to me.  
 10 Q. Did you ever go to any doctor or healer of  
 11 any kind, person, whether it was a chiropractor or  
 12 anything else, with respect to treatment of any  
 13 injury that you allege you suffered in the past as a  
 14 result of anything that Jeffrey Epstein did?  
 15 A. In the past?  
 16 Q. Yep.  
 17 A. No.  
 18 Q. Have you incurred any medical expense at  
 19 all as a result of any physical injury you allege  
 20 you suffered in the past as a result of anything  
 21 Jeffrey Epstein did?  
 22 A. No, but he still molested me for years.  
 23 Q. He what?  
 24 A. He still molested me for years. Sorry he is  
 25 not a physical abuser, you know, or a whatever, a

1 responsive. Please, listen to the question.  
 2 The court reporter is going to read it back and  
 3 just answer my question.  
 4 (The requested portion of the record was  
 5 read by the reporter.)  
 6 THE WITNESS: No.  
 7 BY MR. LUTTIER:  
 8 Q. Has any person with professional knowledge  
 9 or expertise told you that you're going to suffer  
 10 mental stress in the future as a result of anything  
 11 Jeffrey Epstein did?  
 12 A. Yes.  
 13 Q. Who?  
 14 A. [REDACTED]  
 15 Q. [REDACTED] who?  
 16 A. I don't know her last name, but she's a  
 17 counselor.  
 18 Q. [REDACTED]?  
 19 A. What is her name?  
 20 Q. Victim's Services lady?  
 21 A. Yep.  
 22 Q. And when did you see her last?  
 23 A. I don't know the dates, sir.  
 24 Q. Well, in last year?  
 25 A. Yep.

1 violent, you know --  
 2 Q. Have you gone --  
 3 A. -- woman beater.  
 4 Q. Have you gone to any doctor at all with  
 5 respect to any physical injury that you allege you  
 6 suffered in the past as a result of anything that  
 7 Jeffrey Epstein did?  
 8 A. No. Because I was afraid of the man. I  
 9 didn't know what he would do to me. He was powerful to  
 10 me. He was like a master to me. Anything he said I  
 11 would do.  
 12 Q. Now, you allege that the physical injury  
 13 you're going to receive or you're going to suffer in  
 14 the future is a heart attack. Has any person with  
 15 professionalized, with professional knowledge or  
 16 experience told you that you're going to suffer a  
 17 heart in the future because of anything that Jeffrey  
 18 Epstein did?  
 19 A. Anybody that knows that so much stress and so  
 20 much heartache each and every day worried about what you  
 21 are doing and worried about, you know, who, how this guy  
 22 managed me in the past, that's stress. And yeah, you  
 23 can definitely suffer from a heart attack or a stroke or  
 24 panic attacks, anything.  
 25 MR. LUTTIER: Move to strike. Not

1 Q. Did you say, yes?  
 2 A. Yes.  
 3 Q. How many times --  
 4 A. Not 2010 but '09.  
 5 Q. '09? How many times did you see her?  
 6 A. And [REDACTED] has told me the same thing.  
 7 Q. How times have you see her in '09?  
 8 A. Three.  
 9 Q. Do you go with any degree of regularity?  
 10 A. No, but I'm going to.  
 11 Q. Have you gone to her -- how many times  
 12 have you gone in total to her, that is [REDACTED]  
 13 [REDACTED]?  
 14 A. Three times.  
 15 Q. And the last time was sometime in '09?  
 16 A. Yes.  
 17 Q. When was the first time?  
 18 A. '09, I guess, or '08, '08.  
 19 Q. And then you say [REDACTED]. When was the  
 20 last time you saw [REDACTED]?  
 21 A. In '09.  
 22 Q. How many times have you seen her?  
 23 A. Three.  
 24 Q. When was the first time?  
 25 A. In '09.

17 (Pages 563 to 566)

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1 Q. Okay. And I believe at the last  
 2 deposition you said you had seen her twice. Do you  
 3 recall that?  
 4 A. Yeah. I saw her three times though.  
 5 Q. Okay. So, you have seen her one more  
 6 time? You have seen her once since your deposition  
 7 on September 24th '09?  
 8 A. Yes. She came to my house.  
 9 Q. Since September 24th '09?  
 10 A. Since September 24th.  
 11 Q. And for what reason -- I can't hear what  
 12 you're saying. Did you say she did come to your  
 13 house since September 24th, '09?  
 14 A. I don't know the date, sir, but I did a whole  
 15 psychological paper.  
 16 Q. Well, last time in your deposition you  
 17 testified you had seen her twice. That one time you  
 18 saw her on Clematis --  
 19 A. Yeah.  
 20 Q. -- in somebody else's office and you  
 21 thought you had done some sort of evaluation. Do  
 22 you recall that testimony?  
 23 A. Yes.  
 24 Q. All right. That, that would have been one  
 25 time. That was the second time. Where, where did

1 Clematis Street?  
 2 A. That's the last time I saw her. She came to  
 3 my house.  
 4 Q. Okay. So, she's been to your house twice?  
 5 A. From what I recall, yeah, but I can't  
 6 remember.  
 7 Q. Did she go to the apartment that you live  
 8 in now?  
 9 A. Yes.  
 10 Q. Previously, did she come out to a trailer  
 11 where you live, or did she come to the same  
 12 apartment that you live --  
 13 A. I don't live in a trailer.  
 14 Q. So, both times that she came to your house  
 15 she's come to the apartment that you live in now?  
 16 A. Yes, if she came two times. I might have saw  
 17 her two times or I might have saw her two, three, who  
 18 cares?  
 19 Q. For the last, on the last --  
 20 A. You drive me crazy.  
 21 Q. -- time she came for what purpose did she  
 22 come?  
 23 A. For an evaluation to counsel me.  
 24 Q. Well, are those things in your mind the  
 25 same?

1 you see her the very first time?  
 2 A. In the office.  
 3 Q. Whose office?  
 4 A. Her's.  
 5 Q. Where is that?  
 6 A. The place you just named.  
 7 Q. Well, an office on Clematis?  
 8 A. Yes.  
 9 Q. All right. So, you saw her there once and  
 10 then you went back and saw her at that same office  
 11 the second time on Clematis Street?  
 12 A. I think I had to go back there. It might have  
 13 been two times. I'm not sure, sir. She saw me at my  
 14 house either once or twice at my house and then either  
 15 once or twice at that office.  
 16 Q. Well, when you say she saw you at your  
 17 house, was that, I believe, and your memory may be  
 18 different than mine or better. I believe you  
 19 testified at your last deposition that one time she  
 20 came out to your house and one time you saw her at  
 21 an office on Clematis Street that was somebody  
 22 else's office that she was borrowing?  
 23 A. Yes.  
 24 Q. Okay. Now, have you seen her since that  
 25 visit that you had with her in the office on

1 A. No.  
 2 Q. Okay. So, did she come to do an  
 3 evaluation or did she come to give you counseling?  
 4 A. Both.  
 5 Q. How long was she there?  
 6 A. For a few hours.  
 7 Q. Have you had any communication with her  
 8 other than those three occasions that you say she  
 9 visited with you?  
 10 A. She sent me a Christmas card.  
 11 Q. Have you received treatment from any  
 12 mental health specialist other than assuming there  
 13 was any treatment by [REDACTED]? Any other  
 14 psychologist, psychiatrist?  
 15 A. No. But you're damn right I will after this.  
 16 Q. And you last saw Mr. Epstein in 2005?  
 17 A. I went to his house pregnant when I was --  
 18 2006, or no, I was pregnant. I had my son 2005, and  
 19 then I went to his house after I was pregnant.  
 20 Q. I believe you told us in the last  
 21 deposition the latest you could have seen him was  
 22 September of '05. Are you changing that or is that  
 23 correct?  
 24 A. Sir, you know what, when people go through a  
 25 lot of drama in their life, they choose not to really

1 recall a lot of stuff but I know I saw him after I had  
 2 my son.  
 3 Q. Well, you had your son June 29th '05,  
 4 right?  
 5 A. Yes. So, it could have been July, August,  
 6 September, October, November, December. Then maybe it  
 7 could have went on to '0, '06.  
 8 Q. Well, do you know?  
 9 A. I'm not positive but I know that I went there  
 10 after I was pregnant.  
 11 Q. That's all you --  
 12 A. That's all I can tell you.  
 13 Q. All right.  
 14 A. And he didn't want me because he doesn't like  
 15 women that had a kid regardless of what their age is.  
 16 So, I had to bring another girl.  
 17 Q. And that was upsetting to you?  
 18 A. No.  
 19 Q. You thought you were his favorite girl at  
 20 one point?  
 21 A. No.  
 22 Q. That's what you told us in the last depo,  
 23 didn't you?  
 24 A. I told I was his favorite girl?  
 25 Q. That you thought you were special and you

1 Q. Is that November, December?  
 2 A. Maybe.  
 3 Q. Who did you go to?  
 4 A. I went to a cardiac specialist center. I  
 5 don't know what it's called.  
 6 Q. What's the doctor's name?  
 7 A. I have no idea.  
 8 Q. Did you go to a hospital?  
 9 A. No, but they put patches all over my heart and  
 10 a monitor to monitor my heart.  
 11 Q. And, and, and why did you go? What were  
 12 your symptoms?  
 13 A. I have panic attacks all the time. I'm always  
 14 stressed out. I'm depressed.  
 15 Q. And what, what if anything, what if any  
 16 treatment did the doctor render to you?  
 17 A. I ended up not going back because I didn't  
 18 have enough money to pay for that.  
 19 Q. Well, what do you mean you didn't have  
 20 enough money?  
 21 A. What don't you understand about that?  
 22 Q. Well, how much did it cost?  
 23 A. A lot of money.  
 24 Q. How much?  
 25 A. A lot of money. More than grands.

1 were his favorite girl?  
 2 A. He made me feel special. He made me feel like  
 3 I was his favorite girl.  
 4 Q. And it upset you when you found out there  
 5 were other people going?  
 6 A. Did it upset me?  
 7 Q. Yeah.  
 8 A. No.  
 9 Q. So, for the last four years, a little bit  
 10 more than four years, the only person you've seen  
 11 with respect to any alleged mental illness or harm  
 12 has been [REDACTED] and [REDACTED] who was  
 13 provided by the Victim Services Bureau of the State  
 14 Attorney's office?  
 15 A. Yes.  
 16 Q. Have you gone to any cardiologists or any  
 17 physician specializing in --  
 18 A. Yes, I have.  
 19 Q. Who did you go to?  
 20 A. A place in Wellington to see if my heart was  
 21 okay.  
 22 Q. When was that?  
 23 A. The end of '08.  
 24 Q. What do you mean by end of '08?  
 25 A. One of the months that is at the end of '08.

1 Q. Well, how much? You said you --  
 2 A. Like two grand. I don't know. Why don't you  
 3 check my records?  
 4 Q. You said you made two grand on a night,  
 5 right?  
 6 A. Okay. Great. Well, that goes to my son.  
 7 MR. EDWARDS: Object to form,  
 8 argumentative.  
 9 BY MR. LUTTIER:  
 10 Q. You would go and sell your wares, your  
 11 shoes.  
 12 A. So, what all the money I owe, or all the money  
 13 that I earn, goes to my son.  
 14 Q. And you didn't even pay --  
 15 A. Not to suits.  
 16 Q. You didn't even --  
 17 A. Not to receipts.  
 18 Q. You didn't even --  
 19 A. Not to paper.  
 20 Q. And you didn't even pay taxes on money you  
 21 earned, did you?  
 22 MR. EDWARDS: Object to the form.  
 23 THE WITNESS: I did pay taxes.  
 24 BY MR. LUTTIER:  
 25 Q. Did you pay taxes in '08?

1 A. Yes, I did.  
 2 Q. And did you pay on the amount of income  
 3 you actually earned?  
 4 MR. EDWARDS: Object to the form.  
 5 THE WITNESS: It's none of your damn  
 6 business.  
 7 BY MR. LUTTIER:  
 8 Q. Do you know that filing a false tax return  
 9 is a crime?  
 10 A. Yeah, and it wasn't false. Kiss my ass.  
 11 Q. So your, your tax return is in '08 is  
 12 correct; is that right? Is that what you are  
 13 telling us?  
 14 A. No.  
 15 Q. Is it false?  
 16 MR. EDWARDS: Just read.  
 17 BY MR. LUTTIER:  
 18 Q. Now, you allege in your complaint that you  
 19 have suffered, and I am going to list a series of  
 20 things.  
 21 A. Yeah. Can you tell I am suffering?  
 22 Q. Well, ma'am --  
 23 A. Can you tell I am suffering? I hate Jeffrey  
 24 Epstein, and I hope he burns in hell.  
 25 On advice of counsel, I am invoking my

1 A. [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 Q. Then you went to him because you said you  
 10 had your son in Publix, I think, and you had a panic  
 11 attack?  
 12 A. Yes.  
 13 Q. [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 Q. When was the last time you saw this  
 20 [REDACTED]?  
 21 A. I don't know. I couldn't tell you. Why don't  
 22 you look at the documents since you're so smart.  
 23 Q. Well, because we've tried to subpoena this  
 24 doctor and he can't be found. That's why.  
 25 A. Well, too bad for you then. I don't know.

1 Fifth Amendment rights under the United States  
 2 Constitution.  
 3 Q. To anything in particular or just making  
 4 that statement?  
 5 A. To the question you asked me about my taxes.  
 6 Q. That question has already been answered.  
 7 A. Oh, okay. Next.  
 8 Q. In your complaint you allege that you have  
 9 suffered emotional distress, psychological trauma,  
 10 mental anguish, humiliation, embarrassment, loss of  
 11 esteem, loss of dignity, invasion of your privacy.  
 12 A. Amen. Yes, I have.  
 13 Q. Have you --  
 14 A. All of the above.  
 15 Q. Have you described for me thus far in this  
 16 deposition all of those elements that you allege of  
 17 damage that you allege you suffered or is there  
 18 anything else?  
 19 A. [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 A. Yes, I have. And you already know the doctors  
 23 in the last deposition.  
 24 Q. And you said some guy who is no longer in  
 25 business out on Okeechobee. Anybody else?

1 Q. So maybe you haven't seen him quite as  
 2 often as you thought?  
 3 A. Bullshit.  
 4 Q. When was the last time you went then?  
 5 MR. EDWARDS: Watch your language, please.  
 6 THE WITNESS: Last year.  
 7 BY MR. LUTTIER:  
 8 Q. That would be in '09. When in '09?  
 9 A. Beginning of '09.  
 10 Q. You were asked to produce records. You  
 11 didn't produce any records from [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 A. When have I been asked to produce any records?  
 18 Q. You've gotten several requests to produce  
 19 in this case. They go to your lawyer.  
 20 A. Okay. Well, I've been there. So, what do you  
 21 want me to say?  
 22 Q. Well --  
 23 A. [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

1 Q. Stop. We're staying with [REDACTED]  
 2 THE COURT REPORTER: One at a time.  
 3 BY MR. LUTTIER:  
 4 Q. We're going to stay with [REDACTED]  
 5 We're going to follow this down to, right to the  
 6 end.  
 7 A. Okay. Keep on going.  
 8 Q. So, you say you went to him in '09. Where  
 9 did you physically go to him?  
 10 A. I physically went to his doctor's office.  
 11 Q. On Okeechobee? I think you said it was at  
 12 Sansbury and Okeechobee?  
 13 A. Yes.  
 14 Q. So, your testimony is in '09 you went  
 15 physically into that office and saw him?  
 16 A. It might have been end of '08 or '09. I can't  
 17 tell you the date. I don't know the date.  
 18 Q. And you haven't seen him since then, have  
 19 you?  
 20 A. No, I have not.  
 21 Q. So, it's been at least a year --  
 22 A. Because I have enough --  
 23 Q. -- since you've seen him?  
 24 A. [REDACTED]  
 25 [REDACTED]

1 Q. How many pills do you have?  
 2 A. I don't know. I haven't counted them. I'm  
 3 sorry.  
 4 Q. And, and what kind of pills do you have?  
 5 A. What kind of pills?  
 6 Q. What's the drug?  
 7 A. [REDACTED]  
 8 Q. Okay. And [REDACTED] was the drug you used to  
 9 abuse when you were teenager, didn't you?  
 10 A. Yes. I used to abuse them, yes. I don't  
 11 abuse them anymore. I take them when I have panic  
 12 attacks.  
 13 Q. Were you ever addicted to [REDACTED]?  
 14 A. No.  
 15 Q. And you haven't had to refill your  
 16 prescription, have you?  
 17 A. No.  
 18 Q. And you haven't seen anybody other than  
 19 [REDACTED]  
 20 [REDACTED] is that right?  
 21 A. Nope.  
 22 Q. Now, what made -- I want to clarify what  
 23 made you go to see this doctor in Wellington?  
 24 A. Because my, I, I thought I was, something was  
 25 wrong with my heart.

1 Q. [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 Q. Did somebody recommend this physician in  
 6 Wellington to you?  
 7 A. Yes.  
 8 Q. Who did that?  
 9 A. My friend Mark.  
 10 Q. Mark who?  
 11 A. I don't know his last name.  
 12 Q. Where did you meet him?  
 13 A. I don't know.  
 14 Q. And did you pay for your first visit to  
 15 that doctor?  
 16 A. No.  
 17 Q. Who paid for it?  
 18 A. Mark.  
 19 Q. Is he somebody you dated?  
 20 A. No.  
 21 Q. Is he someone with whom you had some kind  
 22 of relationship?  
 23 A. Yeah.  
 24 Q. What kind of relationship did you have  
 25 with him?

1 A. Our sons would play together.  
 2 Q. Do they still play together?  
 3 A. No.  
 4 Q. Was he a client of yours?  
 5 A. No.  
 6 Q. Do you know physically where this office  
 7 was that you went in Wellington?  
 8 A. I told you, no. You have just as a bad memory  
 9 as I do.  
 10 Q. Well, I'm old. Now, what invasion -- what  
 11 do you mean when you say you've suffered invasion of  
 12 your privacy?  
 13 A. Are you serious? Well, here is one. Here is  
 14 two.  
 15 Q. So, you're talking about things that you  
 16 did --  
 17 A. Investigators.  
 18 Q. -- in the public?  
 19 A. All my damn, all these years that I've, after  
 20 Jeffrey they wanted -- invasion of my privacy, are you  
 21 kidding me? I can't go anywhere without anyone knowing  
 22 where I'm going. The FBI, the investigators following  
 23 me everywhere. I can't take my son out with anybody  
 24 knowing me.  
 25 Invasion of my privacy?. Everybody knows

1 that Jeffrey Epstein molested me. So, if my son  
2 wants to go out and play with somebody, oh, no,  
3 she's the little girl that was in prostitution for  
4 Jeffrey Epstein, so we don't want her playing with  
5 our son.

6 Q. So, or do they say she's the lady that  
7 runs her own escort service, we don't want her  
8 playing with our son?

9 A. No one knows about that shit except you guys.

10 Q. How about when you were working for  
11 another escort service?

12 A. How about what?

13 Q. You don't think anybody knew about that?

14 A. No.

15 Q. How about when you were --

16 A. I am very discrete what I do. I don't put my  
17 name in the newspaper like Jeffrey Epstein saying that I  
18 am a prostitute or a slave for Jeffrey Epstein.

19 Q. How about when you were top, dancing  
20 topless at bars? Do you think maybe people said --

21 A. I did that out of, like not locally.

22 Q. So, maybe, well, I mean --

23 A. Well --

24 Q. You wouldn't exactly call Platinum --

25 A. Show Girls is in Boynton Beach Boulevard. I

1 all out. Everybody knows. Okay. You can sit there and  
2 act like you, you can act like an attorney and --

3 Q. Has the words --

4 A. -- say where has your name been? My name is  
5 out there everywhere. Okay. I am the prostitute of  
6 Jeffrey Epstein. I have brought young underaged girls  
7 there. I am so horrible.

8 My son can't play with certain kids  
9 because of Jeffrey Epstein now. He has ruined my  
10 fucking life. He has brought me into this industry  
11 that this is all I know. And now I can't even, I  
12 can't even explain to you the hard things that I've  
13 been through my life because of Jeffrey Epstein,  
14 because he has taught me and many other girls how to  
15 pull money from older men.

16 Q. Let's just be honest for the ladies and  
17 gentleman of the jury: He didn't force you to do  
18 anything?

19 A. But he taught me from a young age --

20 Q. Wait a minute. Let me finish.

21 A. -- when I was 13 years old.

22 Q. You --

23 A. He taught me how to get money real quick.

24 Q. Do you --

25 A. -- from an old man. Don't sit here and tell

1 live in West Palm.

2 Q. So, you meant within the immediate  
3 geographic area. And maybe they said, well, this is  
4 the lady that goes and sells her wares at all these  
5 topless bars; we don't want our children playing  
6 with her.

7 A. No, not all. They see Jeffrey Epstein and my  
8 name all over the place and they say, you know what, I  
9 don't even want anything to with this girl because she  
10 was a prostitute for Jeffrey Epstein.

11 Can I talk to him without you in his ear?  
12 Am I done talking?

13 Q. Could you just tell me one place where  
14 your name has appeared anywhere as being someone who  
15 saw Jeffrey Epstein?

16 A. It's everywhere.

17 Q. Well, where? Just tell me one place.

18 A. Where have you been?

19 Q. Just tell me one place. Can you cite  
20 me --

21 A. It's in the newspaper.

22 Q. What newspaper ever ran your name?

23 A. The initials of my name?

24 Q. No, your name.

25 A. It doesn't matter. The [redacted] means [redacted]. It's

1 me that I was not forced or anything like that.

2 Q. That's exactly what I'm suggesting, ma'am.  
3 Do you believe that you owe, that you have a certain  
4 level of responsibility for your own conduct?

5 A. Now I do.

6 Q. You're 21 years old.

7 A. When I was 13 years old, I didn't, I wasn't,  
8 no, I did not have that demeanor.

9 Q. So, at 21 what you thought, because you  
10 want to clean up your imagine for your son, right?  
11 You want him to look up --

12 A. Yes, I do.

13 Q. So, as part of that process what you  
14 thought you would do at 21 is you would agree to  
15 hire out to strange men whom you don't know for  
16 between \$300 and \$500 for what you say is to go sit  
17 in rooms naked with them, and that's how you thought  
18 you would prove?

19 A. Because that's all I know. I'm sorry.

20 Q. And Jeffrey Epstein didn't make you do  
21 that, did he? You decided to do that, didn't you?

22 A. You know what --

23 Q. A whole new business that you decided to  
24 do on your own; is that right?

25 MR. EDWARDS: Object to form.

22 (Pages 583 to 586)

1 THE WITNESS: -- before I --  
 2 MR. EDWARDS: Argumentative, asked and  
 3 answered.  
 4 BY MR. LUTTIER:  
 5 Q. Did Jeffrey Epstein ever give you the  
 6 business advice on a business plan to go out --  
 7 A. Yes, he did. He gave me business advice.  
 8 Q. Wait. You started this in January?  
 9 A. You know what he told me this: He said, you  
 10 get me girls, this is business. Let's talk business,  
 11 [REDACTED] You get me girls, I will pay you. Is that not  
 12 called business?  
 13 Q. So, and you quit doing that when?  
 14 A. You get me girls, and I brought him two girls  
 15 a day, one girl a day, \$200 each. That's not business?  
 16 Q. And when you --  
 17 A. He taught me business and now I run business.  
 18 Q. And so --  
 19 A. Just like you run business.  
 20 Q. And when did that, when did you start --  
 21 A. Just like you learned how to do this, I  
 22 learned how to do this.  
 23 Q. What -- so, you learned to be a  
 24 prostitute?  
 25 A. Yes, I did.

1 Tape 3.  
 2 MR. EDWARDS: Before we get started I just  
 3 want to put something on the record that there  
 4 was a hearing, I believe it was November 3rd,  
 5 2009, and the judge suggested that the defense  
 6 only have one attorney there. And his  
 7 recommendation was such because of the  
 8 breakdown --  
 9 MR. LUTTIER: Well, let's --  
 10 MR. EDWARDS: -- in the first deposition.  
 11 You can, you can make a record after. That is  
 12 fine. Was because of the breakdown in the  
 13 first deposition, and he thought that that type  
 14 of intimidation by more than one attorney would  
 15 lead to an additional meltdown.  
 16 We have been fine thus far today despite  
 17 there at a minimum always being two attorneys  
 18 and in the last 15 to 20 minutes not only was  
 19 Mark Luttier here and Bob Critton as it has  
 20 been all day, but Jack Goldberger was also in  
 21 the room.  
 22 And once it was lined up three attorneys  
 23 over there, either passing notes, talking in  
 24 each other's ear, and otherwise assisting in  
 25 the deposition or at least that was the feeling

1 Q. And you enjoy it?  
 2 A. No, I don't enjoy it, and I can't wait to get  
 3 the hell out of it.  
 4 Q. And that's why in January of '010 you  
 5 decided what you would do is start getting men to  
 6 pay you \$300 to \$500 an hour to sit around naked  
 7 with them, is that right?  
 8 MR. EDWARDS: Form.  
 9 THE WITNESS: Yes, that's right.  
 10 BY MR. LUTTIER:  
 11 Q. And the last time you took a girl to  
 12 Jeffrey Epstein was when?  
 13 THE WITNESS: Did we already ask this  
 14 question?  
 15 MR. LUTTIER: When? No, the last time --  
 16 MR. EDWARDS: Object to the form.  
 17 MR. LUTTIER: -- you said you went was --  
 18 MR. CRITTON: You're out of time.  
 19 MR. LUTTIER: Okay.  
 20 THE VIDEOGRAPHER: Going off the record at  
 21 3:14 p.m. This is the end of Tape 2.  
 22 (A brief recess was held and  
 23 Mr. Goldberger did not re-enter the room.)  
 24 THE VIDEOGRAPHER: We're back on the  
 25 record at 3:24 p.m. This is the start of

1 from the witness, we began to have another  
 2 meltdown.  
 3 So, hopefully we can proceed with less  
 4 attorneys and we can get through this process.  
 5 But I just wanted to put on the record exactly  
 6 who was in the room when everything started to  
 7 break down just now.  
 8 MR. LUTTIER: Well --  
 9 MR. EDWARDS: If you have something to  
 10 say, that's fine.  
 11 MR. LUTTIER: That just is not factually  
 12 correct. Mr., first of all the judge ordered  
 13 that Mr. Critton and I could be present  
 14 throughout this deposition. Mr. Critton and I  
 15 have been present throughout this deposition,  
 16 and he and I have communicated throughout the  
 17 deposition.  
 18 Mr. Goldberger walked in here. I didn't  
 19 put a stopwatch on how long he was there. He  
 20 is not even here now. He was here for maybe  
 21 ten minutes. I had no communication at all  
 22 with him. He came. He sat here. He got up  
 23 and he walked out.  
 24 This breakdown that you're talking about  
 25 occurred long before Mr. Goldberger ever got

1 here. So, I dispute --  
 2 THE WITNESS: No.  
 3 MR. LUTTIER: -- the facts, but it's sort  
 4 of a moot issue now anyway, so --  
 5 MR. EDWARDS: But if we're going to get  
 6 into that, then every time he comes into the  
 7 room do we need to now put it on the record  
 8 that he is in the room?  
 9 MR. LUTTIER: I have absolutely no  
 10 problem --  
 11 MR. EDWARDS: And each time --  
 12 MR. LUTTIER: Anytime he comes in, we'll  
 13 stop him and we'll let him know he can't come  
 14 in here. Quite frankly, if you would have said  
 15 something to me about it, I was examining the  
 16 witness, I would have stopped right then and  
 17 said, Jack, get out of the room.  
 18 MR. EDWARDS: And I know in all fairness  
 19 to what you just said I am not saying that to  
 20 you was not factually accurate, what you just  
 21 said, but you weren't able to see what was  
 22 behind you, the passing of the cellphone and  
 23 other things that the witnesses notices.  
 24 I am just telling you that this impacts  
 25 the deposition. So, I just want to make it

1 MR. EDWARDS: That's the --  
 2 MR. LUTTIER: Defendant's unverified  
 3 better answers to first interrogatories to  
 4 Plaintiff. Later I'm going to come to the  
 5 Plaintiff's supplemental better answers to  
 6 Defendant's Interrogatory No. 19.  
 7 MR. EDWARDS: Okay. But you said the date  
 8 of service meaning you served on us?  
 9 MR. LUTTIER: No, no. Your answers,  
 10 better answers.  
 11 MR. EDWARDS: Got it. I am looking at the  
 12 same document you are.  
 13 BY MR. LUTTIER:  
 14 Q. All right. Ma'am, in response to some  
 15 interrogatories you stated that from the end of 2007  
 16 to November of 2008 you worked at Palm Beach Angels  
 17 earning \$800 a week. So that would have been a  
 18 period of approximately one year; is that right?  
 19 MR. EDWARDS: Read.  
 20 THE WITNESS: On advice of counsel I am  
 21 invoking my Fifth Amendment rights again under  
 22 the United States Constitution.  
 23 BY MR. LUTTIER:  
 24 Q. From, for the entire period of time that  
 25 you worked at Palm Beach Angels, what did you do for

1 clear so that you would know exactly what's  
 2 happening and maybe we can get through this.  
 3 You know, it's all of our goals to get through  
 4 this day. So, I, I think the witnesses is  
 5 ready if you're ready, Mr. Luttier.  
 6 MR. LUTTIER: I'm ready.  
 7 MR. EDWARDS: Okay.  
 8 MR. CRITTON: What time did we start  
 9 because we haven't -- we've been on the record,  
 10 but we haven't asked a single question.  
 11 THE VIDEOGRAPHER: It's 3:28 right now.  
 12 Three and a half minutes.  
 13 MR. CRITTON: Thank you.  
 14 BY MR. LUTTIER:  
 15 Q. I am now referring to your, your  
 16 interrogatory answers. These are answers that you  
 17 gave to written questions that were sent to you in  
 18 this case. And they are entitled Defendant's  
 19 unverified better answers to first interrogatories.  
 20 I believe they may have been marked as Exhibit 1 to  
 21 the first deposition, but there is only one set of  
 22 them.  
 23 MR. LUTTIER: And Brad, they are, the date  
 24 of service on, I don't know, wait. Date of  
 25 service is August 4th, 2009.

1 your money?  
 2 A. On advice of counsel I'm invoking my Fifth  
 3 Amendment rights under the United States Constitution.  
 4 Q. In continuing in answering that particular  
 5 interrogatory you said that in 2008 you worked at  
 6 Palm Beach Massage. Where is Palm Beach Massage  
 7 located?  
 8 A. On advice of counsel I'm invoking my Fifth  
 9 Amendment rights under the United States Constitution.  
 10 Q. What did you do at Palm Beach Massage?  
 11 A. On advice of counsel I'm invoking my Fifth  
 12 Amendment rights under the United States Constitution.  
 13 Q. Did you have any communication with  
 14 Jeffrey Epstein after the phone call you made to him  
 15 following the FBI's interview of you?  
 16 A. I talked to [REDACTED]. Oh, my God. I don't know  
 17 what I am going through. I'm like shaking.  
 18 Q. I am talking about now a conversation with  
 19 Mr. Epstein.  
 20 MR. EDWARDS: The question was, did you  
 21 talk to him after you called him --  
 22 MR. LUTTIER: Right.  
 23 MR. EDWARDS: -- after the FBI statement?  
 24 MR. LUTTIER: Right.  
 25

1 BY MR. LUTTIER:  
 2 Q. And the date of your FBI statement for  
 3 your information was April 24th, 2007. Did you have  
 4 any conversation with Jeffrey Epstein after that  
 5 date?  
 6 A. After I, after I had called my attorney?  
 7 Q. After April 24th, '07, which is the date  
 8 that you gave a statement to the FBI.  
 9 A. I talked to [REDACTED] (sic) or whatever her  
 10 name is.  
 11 Q. Did you have any conversation with Jeffrey  
 12 Epstein?  
 13 A. No. I don't think so, no.  
 14 Q. Other than the witnesses you have listed  
 15 in answer to Interrogatory No. 5, do you know of any  
 16 other witnesses or do you intend to call any  
 17 witnesses in the trial of this matter?  
 18 A. What?  
 19 MR. EDWARDS: Objection. Attorney-client  
 20 privilege. I don't want her answering  
 21 questions as to whether, as to information that  
 22 she and I have spoken about in terms of what  
 23 witnesses will be called at trial or our trial  
 24 strategy.  
 25

1 with [REDACTED] about being a witness? That is what  
 2 would he be offering as testimony in the case?  
 3 A. What would he be offering?  
 4 Q. Yeah. Why did you ask him about being a  
 5 witness?  
 6 A. I didn't ask him about being a witness. I  
 7 told him about what happened to me when I was 13 years  
 8 old.  
 9 Q. Okay.  
 10 A. I'm not asking anybody to be a witness as of  
 11 right now.  
 12 Q. What is --  
 13 A. I'm my own witness.  
 14 MR. EDWARDS: Listen to his question.  
 15 THE WITNESS: I am trying. I can't think  
 16 right now.  
 17 MR. EDWARDS: He wasn't asking you about  
 18 being a witness.  
 19 BY MR. LUTTIER:  
 20 Q. Where does [REDACTED] live now?  
 21 A. West Palm Beach.  
 22 Q. Where in West Palm?  
 23 A. [REDACTED]  
 24 Q. When did you last have communication with  
 25 him?

1 BY MR. LUTTIER:  
 2 Q. Have you spoken to anyone with respect to  
 3 their willingness or your intention to call them as  
 4 a witness to the trial of this matter?  
 5 MR. EDWARDS: Not who I have spoken to.  
 6 MR. LUTTIER: Yeah, you.  
 7 THE WITNESS: What?  
 8 BY MR. LUTTIER:  
 9 Q. Have you spoken to anybody about being a  
 10 witness in the trial of this matter?  
 11 A. [REDACTED]  
 12 Q. Anyone else?  
 13 A. Not that I know of.  
 14 Q. And when did you speak with [REDACTED]  
 15 about being a witness?  
 16 A. May '09.  
 17 Q. And what is it you told him or asked him  
 18 about being a witness?  
 19 A. I told him that Jeffrey Epstein molested me  
 20 since I was 13 years old.  
 21 Q. Okay. And he wasn't around at the time  
 22 that you alleged Mr. Epstein molested you, correct?  
 23 A. He wasn't around at the time when Jeffrey  
 24 Epstein was molesting me.  
 25 Q. Okay. So, for what purpose did you confer

1 A. January 3rd, 2010.  
 2 Q. And for what purpose did you have  
 3 communication with him on that date?  
 4 A. I had to give him some of his clothes.  
 5 Q. When was the last time you were in  
 6 communication with [REDACTED] that would be [REDACTED]  
 7 [REDACTED]?  
 8 A. He's my son's father. So, I talked to him two  
 9 weeks ago.  
 10 Q. And where was he when you talked to him?  
 11 A. Fort Myers.  
 12 Q. And do you know how he's employed now?  
 13 A. No. He says he's not employed.  
 14 Q. Have you discussed with him in the last  
 15 year anything about this lawsuit?  
 16 A. Yes.  
 17 Q. What have you discussed with him?  
 18 A. I told him I'm going through a lawsuit.  
 19 Q. And what did he say?  
 20 A. He said okay.  
 21 Q. Have you asked him to be a witness?  
 22 A. No.  
 23 Q. Have you been in communication with any  
 24 other members of [REDACTED] family in the last  
 25 two years?

1 A. Yes.  
 2 Q. Who?  
 3 A. [REDACTED] (phonetic).  
 4 Q. Who is [REDACTED]?  
 5 A. His sister.  
 6 Q. And where does she live?  
 7 A. Wellington.  
 8 Q. And for what purpose have you been in  
 9 touch with her?  
 10 A. She's my son's aunt.  
 11 Q. And with what degree of frequency are you  
 12 in communication with her?  
 13 A. She asked me to attend her wedding via e-mail  
 14 this March of '010.  
 15 Q. Have you discussed with her anything about  
 16 Mr. Epstein?  
 17 A. No.  
 18 Q. Does she to the best of your knowledge  
 19 know anything about it?  
 20 A. Yes.  
 21 Q. Did you say no?  
 22 A. Yes.  
 23 Q. Does she know anything about?  
 24 A. Yes.  
 25 Q. What does she know about it?

1 A. That Jeffrey Epstein's a child molester.  
 2 Q. And how did she get that information?  
 3 A. From the news, from friends, from the  
 4 neighborhood --  
 5 Q. Did --  
 6 A. From her brother.  
 7 Q. -- has she asked you any questions about  
 8 your relationship or interaction with Mr. Epstein?  
 9 A. She said I am sorry that you're going through  
 10 the trauma that you're going through.  
 11 Q. Have you been in communication with any  
 12 other member of [REDACTED] family?  
 13 A. His mother.  
 14 Q. And what's her name?  
 15 A. [REDACTED].  
 16 Q. And where is she located?  
 17 A. Fort Myers.  
 18 Q. And when did you last have communication  
 19 with her?  
 20 A. I don't know. A year ago.  
 21 Q. And for what purpose did you have  
 22 communication with her at that time?  
 23 A. Dropping my son off with her.  
 24 Q. In Fort Myers?  
 25 A. Belle Glade.

1 Q. Is that the last time she's seen your son?  
 2 A. Approximately, yeah.  
 3 Q. Who was watching your son when you were  
 4 down at Spearmint Rhino's from 8:00 at night until 5  
 5 in the morning?  
 6 A. T.L. no. Not T.L. sorry. [REDACTED].  
 7 Q. [REDACTED] (sic) who you  
 8 identified earlier? [REDACTED] rather?  
 9 A. Yeah.  
 10 Q. And where was she watching him?  
 11 A. At my house.  
 12 Q. So, does she come spend the night at your  
 13 house?  
 14 A. Yes.  
 15 Q. Did there, was there ever a time that you  
 16 and [REDACTED] lived together?  
 17 A. Yes.  
 18 Q. When was that?  
 19 A. When we were 13, 14.  
 20 Q. Thirteen and 14. Was any adult living  
 21 with you?  
 22 A. My father.  
 23 Q. Since you were 13 or 14 has [REDACTED] ever  
 24 lived with you?  
 25 A. No.

1 Q. Did you tell [REDACTED] why you needed  
 2 to have her watch your son all night when you were  
 3 down at Spearmint Rhino's?  
 4 A. I told her I need to work.  
 5 Q. Do you tell her what you do for work?  
 6 A. Yes.  
 7 Q. What did you tell her?  
 8 A. I sell lingerie and shoes and purses and Mary  
 9 Kay.  
 10 Q. Do you have any personal knowledge of the  
 11 matters about which the witnesses listed in your  
 12 answers to interrogatories that these witnesses  
 13 have, have information about?  
 14 MR. EDWARDS: Objection, attorney-client  
 15 privilege. And we do this all the time.  
 16 BY MR. LUTTIER:  
 17 Q. This is just a list as prepared by your  
 18 lawyer. You don't know what any one of these  
 19 witnesses would say?  
 20 MR. EDWARDS: And if she does, it's going  
 21 to be information that I have talked to her  
 22 about which you know is protected by  
 23 attorney-client privilege and so do I.  
 24 If you're asking her independent of her  
 25 information I have told her, fine.

1 MR. LUTTIER: That's exactly what I am  
 2 asking her.  
 3 MR. EDWARDS: Okay. Let's ask it that way  
 4 because it doesn't sound like that.  
 5 BY MR. LUTTIER:  
 6 Q. Do you know of any information that these  
 7 witnesses have based on your communications with  
 8 them?  
 9 A. Excuse me?  
 10 Q. Do you know any information that any of  
 11 these witnesses have about this case based on your  
 12 personal contact with them?  
 13 A. What witnesses?  
 14 Q. That are listed in the Answers to  
 15 Interrogatory 5.  
 16 MR. EDWARDS: Just answer his question,  
 17 yes or no.  
 18 THE WITNESS: No. I don't know these  
 19 people.  
 20 BY MR. LUTTIER:  
 21 Q. On any visit that you went to see Jeffrey  
 22 Epstein, did he ever ask you to do anything that you  
 23 said you did not want to do?  
 24 A. Yes.  
 25 Q. What did he ask you to do that you said

1 all that you said I don't want to do this and Jeff  
 2 said you had to do it anyway?  
 3 A. Yeah. I told him that at times I did not want  
 4 to bring girls, and he says, yes, I want you to do it  
 5 anyway; you need to do it anyway.  
 6 Q. And did you tell all the girls that you  
 7 brought that Jeffrey would respect their wishes, and  
 8 if they were uncomfortable doing anything, that they  
 9 should just tell him that, and he wouldn't ask them  
 10 to do anything that they weren't comfortable doing?  
 11 A. Yes, because I was scared.  
 12 Q. And that's, in fact, how he treated you,  
 13 right?  
 14 A. Yes.  
 15 Q. You previously earned a degree as an  
 16 esthetician; is that right?  
 17 A. Yes.  
 18 Q. And you now earned a degree since going to  
 19 Mr. Epstein in massage therapy, correct?  
 20 A. Yes.  
 21 Q. And you earned both of those from the same  
 22 school located on Northlake Boulevard?  
 23 A. Yes.  
 24 Q. And you could pursue a profession as an  
 25 esthetician, a massage therapist if you so chose,

1 you didn't want to do?  
 2 A. At one occasion he wanted to stick his fingers  
 3 like all the way inside of me and I said no?  
 4 Q. And what did he then do when you said no.  
 5 A. He said okay. So then he just penetrated my  
 6 vagina with his fingers.  
 7 Q. What did he, did he -- when you said you  
 8 didn't want him to do that, did he respect your  
 9 wishes and not do it?  
 10 A. No. Actually he, he pushed it. He tried to  
 11 do it and he said, okay, no, it's going to be okay.  
 12 It's going to be okay. And I backed off and I said no.  
 13 Q. And then he stopped?  
 14 A. Then he decided to respect my wishes.  
 15 Q. Okay. Any other -- and this is on one  
 16 occasion?  
 17 A. Many occasions.  
 18 Q. Well, on -- so on many occasions he would  
 19 say he wanted to penetrate your vagina. You would  
 20 say you didn't want -- well, actually what you said  
 21 was he wanted to penetrate your vagina deeply I  
 22 think. And, and you said no and he respected your  
 23 wishes and didn't do it?  
 24 A. Correct.  
 25 Q. Okay. Was there ever anything that, at

1 could you not?  
 2 A. No, not as a massage therapist.  
 3 Q. Why not?  
 4 A. Because I've told you once before I need to  
 5 take the nationals.  
 6 Q. But no one has prevented you from taking  
 7 test, right?  
 8 A. I have to wait to take the test. It only  
 9 happens twice a year.  
 10 Q. And has -- did you pass the first  
 11 opportunity you had?  
 12 A. No.  
 13 Q. Okay. So, when's, when's the test coming  
 14 up?  
 15 A. In a few months.  
 16 Q. And are you going to take it?  
 17 A. Yes.  
 18 Q. And you could have been working as an  
 19 esthetician ever since you went to Jeffrey  
 20 Epstein's?  
 21 A. And I did work as an esthetician.  
 22 Q. No one has prevented you from doing that,  
 23 correct?  
 24 A. No.  
 25 Q. You made the decision to drop out of

1 school before you ever met Jeffrey Epstein, did you  
2 not?  
3 A. I'm pretty sure I was going to school when I  
4 was seeing Jeffrey Epstein.  
5 Q. But, but you made the decision to drop out  
6 based on other facts and circumstances that had  
7 nothing to do with seeing Jeff Epstein; isn't that  
8 correct?  
9 A. Excuse me?  
10 Q. You decided to drop out of school for your  
11 own reasons particularly I think you said because  
12 you got pregnant, didn't you?  
13 A. No.  
14 Q. Well, why did you decide to drop out of  
15 school?  
16 A. I was trying to find girls to bring to  
17 Jeffrey's house.  
18 Q. Well, didn't you tell us the last  
19 deposition that you dropped out when you got  
20 pregnant?  
21 A. I was going to school when I was pregnant.  
22 Q. Yeah. And then you dropped out, right?  
23 A. I dropped out when I was four months pregnant.  
24 Q. Why did you drop out of Palm Beach  
25 Community School and then go to Pace school?

1 A. Because ever since I met Jeffrey I -- before  
2 Jeffrey I made wonderful grades. And then ever since I  
3 met Jeffrey my grades went down and I was failing, so I  
4 had to go to a school to bring my grades back up.  
5 Q. But you opted to drop out of the Pace  
6 school before you graduated?  
7 A. Yes. I was four months pregnant.  
8 Q. And that's why you dropped out?  
9 A. Well, I needed to make money to buy a house, a  
10 trailer so I could have my baby.  
11 Q. Because you were pregnant?  
12 A. Yes.  
13 Q. Had you not been pregnant, you would have  
14 continued in school, correct?  
15 A. I can't answer that question. I don't know.  
16 Q. Well, the point is the direct reason why  
17 you dropped out was you were pregnant?  
18 A. And I was making so much money off of Jeffrey  
19 that I didn't think school was so necessary at that  
20 time.  
21 Q. Did you consult with your parents or any  
22 counselors about that?  
23 A. I didn't tell my parents about Jeffrey.  
24 Q. How much were you making at that time?  
25 A. I was making \$200 pretty much a day or 400 or

1 six. But then I did go back and I got my high school  
2 diploma, and like you said I have two degrees.  
3 Q. When did you get your, your GED?  
4 A. Yes.  
5 Q. When did you get that?  
6 A. When I turned 18.  
7 Q. And who did you get that from?  
8 A. The Adult Education Center.  
9 Q. So, you got a high school equivalency  
10 diploma at the same time you would have gotten a  
11 high school graduation certificate --  
12 A. Correct.  
13 Q. -- had you stayed in school?  
14 A. Correct.  
15 Q. And then you were free to pursue the same  
16 pursuits as anybody else that had graduated from  
17 high school whether that would be college or a trade  
18 school or whatever you want to?  
19 A. No, no. If I would have stayed in school, I  
20 could have got some type of scholarship. I could have  
21 had many opportunities in school to learn higher  
22 education than just the GED.  
23 Q. Well, when you got --  
24 A. And I could have -- traveled and I could have  
25 went to a college, a bigger college, a state college.

1 Q. How do you know that?  
2 A. It's common sense.  
3 Q. Well, you don't know what your grades  
4 would have been, right?  
5 A. No, I don't know what my grades would have  
6 been.  
7 Q. And at --  
8 A. Do you know what tomorrow is going to bring?  
9 Q. At the time that you went into the Pace  
10 school, you were practically failing, weren't you?  
11 A. Yeah, but Pace, they help girls, young girls  
12 bring up their grades so you can go back into high  
13 school and accomplish making more, bettering your grades  
14 so you can get a scholarship.  
15 Q. Well, in fact you got a scholarship for  
16 your massage therapy, didn't you?  
17 A. No. How could I?  
18 Q. Did you tell us in the last deposition  
19 that you got some kind of scholarship for going  
20 there?  
21 A. I didn't get a scholarship for going. No.  
22 I've never got a scholarship.  
23 Q. Did they lend you money to go to school  
24 there?  
25 A. For massage therapy but not for esthetics.

1 Q. That's what I was talking about was  
 2 massage therapy.  
 3 A. That's not a scholarship.  
 4 Q. Okay.  
 5 A. That's a loan that I have to still payback.  
 6 Q. Did you ever travel anyplace with Jeffrey  
 7 Epstein?  
 8 A. Nope.  
 9 Q. Are you -- you're a person that uses the  
 10 computer now, correct?  
 11 A. Yep.  
 12 Q. Did you ever communicate with Jeff Epstein  
 13 on the computer?  
 14 A. No, not that I recall.  
 15 Q. Who is [REDACTED] (phonetic)?  
 16 A. A boyfriend that I had when I was younger.  
 17 Q. And when was he your boyfriend?  
 18 A. I think I was 14.  
 19 Q. Was he before [REDACTED]?  
 20 A. No.  
 21 Q. Was he after?  
 22 A. No, no, no. [REDACTED], he was before  
 23 [REDACTED], yes.  
 24 Q. And was [REDACTED] your boyfriend before you  
 25 saw Jeff Epstein?

1 A. Yes.  
 2 Q. And did you have sexual relations with  
 3 [REDACTED]?  
 4 A. I was younger when, when I dated [REDACTED].  
 5 I was --  
 6 Q. Thirteen?  
 7 A. I think I just turned 13.  
 8 Q. And did you have sexual relations with  
 9 Mr. [REDACTED]?  
 10 A. No.  
 11 Q. Well, you filed a better answers to  
 12 Interrogatory 19 which asked you to identify all  
 13 persons with whom you were sexually involved from  
 14 age ten through September 2005. And one of the  
 15 people you put was [REDACTED].  
 16 A. Okay. I'm sorry. I never had sex with [REDACTED].  
 17 [REDACTED].  
 18 Q. Did you have some kind of sexual activity  
 19 with him?  
 20 A. No, we just kissed.  
 21 Q. Who is [REDACTED]?  
 22 A. He lived off Drexel when I was living on  
 23 Drexel.  
 24 Q. Was he your boyfriend at one time?  
 25 A. No.

1 Q. Did you have sex with him?  
 2 A. Yes.  
 3 Q. When?  
 4 A. The times I was seeing Jeffrey.  
 5 Q. Say when?  
 6 A. The time --  
 7 Q. While you were seeing Jeffrey?  
 8 A. Yes.  
 9 Q. And [REDACTED] is, was, is a former  
 10 boyfriend of yours?  
 11 A. Yes.  
 12 Q. Had sex with him obviously, right?  
 13 A. Yes.  
 14 Q. And that was after [REDACTED]?  
 15 A. Yes.  
 16 Q. And [REDACTED], another boyfriend of  
 17 yours with whom you had sex?  
 18 A. Yes.  
 19 Q. You had sex with [REDACTED] while you were  
 20 seeing Jeffrey Epstein?  
 21 A. No, no. I don't know. I don't know.  
 22 Q. Well, you were having sex with at least  
 23 four people while you were going to see Jeffrey  
 24 Epstein; is that correct. [REDACTED] ?

1 A. Yes.  
 2 MR. EDWARDS: Object to the form.  
 3 BY MR. LUTTIER:  
 4 Q. And you weren't having any, during that  
 5 whole period you weren't having sex with  
 6 Mr. Epstein; you were just doing the massages --  
 7 A. Yes.  
 8 Q. -- as opposed to actually engaging in  
 9 sexual acts with [REDACTED].  
 10 [REDACTED].  
 11 MR. EDWARDS: Object to the form.  
 12 BY MR. LUTTIER:  
 13 Q. Did you engage in both sexual intercourse  
 14 and oral sex with each of the individuals, [REDACTED].  
 15 [REDACTED] ?  
 16 A. Just intercourse.  
 17 Q. No oral sex with any of those individuals?  
 18 A. Name them and I will tell you.  
 19 Q. [REDACTED] ?  
 20 A. Yes.  
 21 Q. I think you already told us yes. And by  
 22 way when you say oral sex, is that both giving and  
 23 receiving?  
 24 A. Giving.  
 25

1 Q. Giving. You didn't receive any oral sex  
 2 from [REDACTED] ?  
 3 A. Not that I remember.  
 4 Q. [REDACTED] ?  
 5 A. Yes, both.  
 6 Q. Both?  
 7 A. Give, receive.  
 8 Q. Okay. [REDACTED] ?  
 9 A. Give, receive.  
 10 Q. [REDACTED] ?  
 11 A. Intercourse.  
 12 Q. No oral?  
 13 A. No.  
 14 Q. Did, did any of those individuals, Mr.  
 15 Lange, [REDACTED], his brother [REDACTED], or  
 16 [REDACTED] ever perform any sexual act on you that  
 17 you didn't want them to perform on you?  
 18 A. No. It was consensual.  
 19 Q. Did [REDACTED] or [REDACTED] ever perform  
 20 any sexual act on you that you didn't want them to  
 21 perform on you?  
 22 A. No, it was consensual.  
 23 Q. And was your sex with [REDACTED] both  
 24 sexual intercourse as well as oral sex?  
 25 A. Yes.

1 mean in particular?  
 2 MR. EDWARDS: Form.  
 3 THE WITNESS: Let's just say his cock was  
 4 as big as Jeffrey's.  
 5 BY MR. LUTTIER:  
 6 Q. That would be an indication of size or  
 7 lack of size?  
 8 A. Lack of size. Thanks for making me laugh.  
 9 Q. Are you on any prescription medication  
 10 now?  
 11 A. No.  
 12 Q. You testified in your last deposition that  
 13 you had participated in making some kind of a tape  
 14 in which you were engaged in sexual activities. Do  
 15 you recall that?  
 16 A. Yes.  
 17 Q. What, what, with whom did you make that  
 18 tape?  
 19 A. [REDACTED].  
 20 Q. And when was that made?  
 21 A. '07.  
 22 Q. After Mr. Epstein?  
 23 A. Yes.  
 24 Q. Couple years after Mr. Epstein?  
 25 A. Yes.

1 Q. And how about with [REDACTED] ?  
 2 A. Yes.  
 3 Q. And somewhere along the line after that  
 4 you met [REDACTED] ?  
 5 A. Yes.  
 6 Q. Where did you meet him?  
 7 A. I knew him for a while but I met him like  
 8 January of '09 in Cheetah's nightclub.  
 9 Q. And why were you in, in Cheetah night club  
 10 in January of '09?  
 11 A. Hanging out.  
 12 Q. Were you dancing?  
 13 A. No.  
 14 Q. What was he doing there?  
 15 A. Hanging out.  
 16 Q. And, and you had sexual intercourse with  
 17 him. Did you have oral sex with him?  
 18 A. Yes.  
 19 Q. Was the sex good?  
 20 MR. EDWARDS: Object to the form.  
 21 THE WITNESS: No.  
 22 MR. LUTTIER: Huh?  
 23 THE WITNESS: No.  
 24 BY MR. LUTTIER:  
 25 Q. And when you say no, what, what do you

1 Q. And what was depicted on the tape?  
 2 A. Just him and I having sex, oral sex,  
 3 intercourse, dancing, fun, fun, fun.  
 4 Q. And where was it made?  
 5 A. In the house that we lived together.  
 6 Q. And whose idea was it to make it?  
 7 A. Both of us.  
 8 Q. And did a third party film it --  
 9 A. No.  
 10 Q. -- or did you set up a tripod?  
 11 A. I set up a camera.  
 12 Q. And what happened to the tape?  
 13 A. I deleted it.  
 14 Q. Did anybody see the tape?  
 15 A. No.  
 16 Q. You didn't show it to anybody?  
 17 A. I might have. I might have showed to [REDACTED] but  
 18 I don't think she cared to see it.  
 19 Q. Well, you weren't embarrassed about it,  
 20 were you?  
 21 A. No.  
 22 Q. You are, you are, would you say  
 23 comfortable with your body?  
 24 A. I guess I have to be if I am in this industry,  
 25 right?

1 Q. Well, I mean being naked doesn't offend  
 2 you?  
 3 A. Yeah, it does.  
 4 Q. It does offend you?  
 5 A. Yeah.  
 6 Q. Well, what percentage of your time when  
 7 you're working with your business did you spend  
 8 being naked?  
 9 A. A lot.  
 10 Q. But you choose to do it?  
 11 A. Yeah.  
 12 Q. You have been the victim of acts of  
 13 domestic violence, have you not?  
 14 A. Yes.  
 15 Q. When was the first time you were the  
 16 victim of an act of domestic violence?  
 17 A. With [REDACTED] I told you that.  
 18 THE COURT REPORTER: I'm sorry?  
 19 THE WITNESS: With [REDACTED]  
 20 BY MR. LUTTIER:  
 21 Q. Were you only a victim of domestic  
 22 violence on one occasion with Mr. [REDACTED]?  
 23 A. Yes. I was a victim, yes.  
 24 Q. And that was the first time that you had  
 25 ever been a victim of domestic violence?

1 BY MR. LUTTIER:  
 2 Q. Did you she ever approach you about that?  
 3 A. No.  
 4 Q. Did she ever tell the police she was  
 5 concerned about that?  
 6 A. No.  
 7 MR. EDWARDS: Object to the form.  
 8 BY MR. LUTTIER:  
 9 Q. Was your mother concerned that you were  
 10 sexually active at an early age?  
 11 MR. EDWARDS: Form, predicate.  
 12 MR. CRITTON: What's the form?  
 13 THE WITNESS: She was probably concerned.  
 14 MR. EDWARDS: You're asking --  
 15 MR. LUTTIER: Was your mother --  
 16 MR. EDWARDS: You're asking [REDACTED] to tell  
 17 you whether she knows how her mother was  
 18 feeling at some certain time.  
 19 BY MR. LUTTIER:  
 20 Q. The question stands. Was your mother ever  
 21 concerned that you were sexually active at an early  
 22 age?  
 23 MR. EDWARDS: Same objection.  
 24 THE WITNESS: She probably was concerned,  
 25 yeah.

1 A. Yes.  
 2 Q. Do you know of [REDACTED] (phonetic)?  
 3 A. Yeah.  
 4 Q. Who is that?  
 5 A. It's actually my sister's son or daughter's  
 6 father's cousin.  
 7 Q. Sister's daughter? Your sister has a  
 8 daughter?  
 9 A. Yes.  
 10 Q. So, [REDACTED] daughter's cousin's father?  
 11 A. [REDACTED] baby's father, his cousin.  
 12 Q. Okay. When did you first meet [REDACTED]  
 13 [REDACTED]?  
 14 A. Probably knew him since I was 11.  
 15 Q. And did your mother express to you  
 16 concerns as early as February of '03 that you were  
 17 sexually active with him?  
 18 A. I was never sexually active with him.  
 19 Q. Did your mother believe that you were?  
 20 MR. EDWARDS: Object to the form.  
 21 BY MR. LUTTIER:  
 22 Q. Do you know?  
 23 MR. EDWARDS: Predicate.  
 24 THE WITNESS: No.  
 25

1 BY MR. LUTTIER:  
 2 Q. Why?  
 3 A. Who would want there daughter being sexually  
 4 active at a young age?  
 5 Q. What gave her that concern? What  
 6 activities were you engaging in to give her that  
 7 concern?  
 8 MR. EDWARDS: Object to the form,  
 9 predicate.  
 10 THE WITNESS: A mother's love. I don't  
 11 know. I can't speak for my mother. I am  
 12 sorry.  
 13 BY MR. LUTTIER:  
 14 Q. Were you doing something that gave her  
 15 that concern?  
 16 MR. EDWARDS: Object to the form,  
 17 speculation.  
 18 THE WITNESS: I don't know.  
 19 BY MR. LUTTIER:  
 20 Q. Are you aware of the fact that your father  
 21 filed a Petition for Involuntary Treatment for  
 22 Substance Abuse with respect to you back in July of  
 23 '04?  
 24 A. He filed for what?  
 25 Q. What's called a Marchmen Act proceeding, a

1 Petition for Involuntary Treatment for Substance  
 2 Abuse.  
 3 A. I never went to any program or anything.  
 4 Q. Yeah, but do you know he filed a petition  
 5 in the court claiming that you come home when you  
 6 want to, you're in trouble with the police, and that  
 7 you're taking Xanax, cocaine, and alcohol? Did you  
 8 know he filed that in July of '04?  
 9 A. No.  
 10 Q. You didn't know that?  
 11 A. (Witness shakes head.)  
 12 Q. Were you, in fact, taking Xanax, cocaine,  
 13 and alcohol in July of '04?  
 14 A. Yes. I apologized to my father.  
 15 Q. So, he had a legitimate concern at that  
 16 time?  
 17 MR. EDWARDS: Form.  
 18 THE WITNESS: Yes.  
 19 BY MR. LUTTIER:  
 20 Q. And with what degree were you taking  
 21 cocaine and alcohol at that time?  
 22 A. I was a confused little girl with Jeffrey  
 23 Epstein and that always, leaving Jeffrey Epstein's house  
 24 always lead me to do more drugs and more drugs. I was  
 25 uncomfortable about my body.

1 A. Concern?  
 2 Q. Yeah. I mean were you afraid?  
 3 A. Only for that one night that he was on coke.  
 4 He was just trying to, like, get in my house and I  
 5 didn't want him in there.  
 6 Q. Do you know a lady by the name of  
 7 Jacqueline Miller?  
 8 A. Yeah.  
 9 Q. How do you know Jacqueline Miller?  
 10 A. Oh, my. I know her through T.J.  
 11 Q. Who is T.J.?  
 12 A. A friend of mine.  
 13 Q. Where did you meet T.J.?  
 14 A. Through Jacqueline Miller's boyfriend.  
 15 Q. And who's Jacqueline Miller's boyfriend?  
 16 MR. EDWARDS: Did you have a question,  
 17 Bob?  
 18 MR. CRITTON: He was telling me to ask her  
 19 what T.J.'s --  
 20 MR. EDWARDS: Oh, sorry --  
 21 MR. LUTTIER: -- full name is. We'll get  
 22 to that.  
 23 MR. EDWARDS: Okay.  
 24 THE WITNESS: I don't -- oh, God, I don't  
 25 remember his name but they were both no good.

1 Q. What were you --  
 2 A. I didn't like the way Jeffrey made me feel.  
 3 Q. What were you uncomfortable about your  
 4 body about?  
 5 A. I felt insulted. I felt used.  
 6 Q. Did you tell him that?  
 7 A. No.  
 8 Q. Did you tell anybody that?  
 9 A. Yeah.  
 10 Q. Who did you tell?  
 11 A. [REDACTED]  
 12 Q. On the, on the way over to Jeffrey  
 13 Epstein's when you were taking her there?  
 14 A. Yeah. We would tell each other that we didn't  
 15 like the way we felt.  
 16 Q. Did you file a complaint that your  
 17 boyfriend [REDACTED] was stalking you?  
 18 A. Yes.  
 19 Q. Was he, in fact, stalking you?  
 20 A. He got -- he was on coke one day, and I was  
 21 scared because he was trying to get in the house and I  
 22 didn't want nothing to do with him.  
 23 Q. Did that give you some concern?  
 24 A. Excuse me?  
 25 Q. Did that give you concern?

1 They were like gang members.  
 2 BY MR. LUTTIER:  
 3 Q. That is T.J.?  
 4 A. No, Jacqueline and her boyfriend.  
 5 Q. Okay. But you don't remember the  
 6 boyfriends's name? How did you -- what was your  
 7 relationship with Jacqueline Miller?  
 8 A. Associates. We talked once in a while.  
 9 Q. When did you first meet her?  
 10 A. In -- I don't know. Maybe when I was 14.  
 11 Q. Did she live in your neighborhood?  
 12 A. No.  
 13 Q. How did you meet her?  
 14 A. I'm not sure.  
 15 Q. Was she a friend?  
 16 A. She became an associate.  
 17 Q. Is there a difference between an associate  
 18 and a friend?  
 19 A. Yeah. A friend is someone who's always by  
 20 your side and who you can talk to daily, and an  
 21 associate is just someone you can, that you know.  
 22 Q. Did you socialize with her?  
 23 A. Yeah.  
 24 Q. What kinds of things did you do with her?  
 25 A. Not good things.

1 Q. What things?  
 2 A. We did, we did coke together.  
 3 Q. Who provided the coke?  
 4 A. She did.  
 5 Q. And anything else that you did with her?  
 6 A. Just drugs.  
 7 Q. What other drugs?  
 8 A. Coke and pills.  
 9 Q. Who provided the pills?  
 10 A. She did.  
 11 Q. And this was during the time that you were  
 12 seeing Mr. Epstein?  
 13 A. Yeah.  
 14 Q. What else did you and she do together?  
 15 A. Nothing.  
 16 Q. Did you-all live together at some point?  
 17 A. I asked her to -- she asked me if she could  
 18 room with me when I was living in my trailer and I gave  
 19 her a chance. About a week later I found out that she  
 20 was not the kind of friend for me at all and she was  
 21 into no good things. And I have a son so I couldn't  
 22 have her around.  
 23 Q. What do you mean she was into no good  
 24 things?  
 25 A. She was into drugs and stealing and --

1 A. Yeah.  
 2 Q. And she threatened to kill you?  
 3 A. Yeah, she threatened a lot of stuff.  
 4 Q. And did you believe she had the capacity  
 5 to do that?  
 6 A. No.  
 7 Q. What gang was she in?  
 8 A. Folk (phonetic).  
 9 Q. And did you know her to be a violent  
 10 person?  
 11 A. Yeah. But she's like 80-pounds soaking wet so  
 12 I'm not worried about her. She's just lost and God  
 13 bless her soul.  
 14 Q. Now, let's talk about Mr., is it [redacted] or  
 15 Redell (phonetic)?  
 16 A. [redacted]  
 17 Q. Okay. And you have described earlier a  
 18 confrontation that you had with him. And was his  
 19 mother present for that confrontation?  
 20 A. Yes.  
 21 Q. And, and did it initially start out that  
 22 Mr. [redacted] was physically abusive towards his  
 23 mother?  
 24 A. Yes. I had told him to leave and his mother  
 25 came to pick up his daughter from my house. When she

1 Q. Did you and she have a physical  
 2 confrontation?  
 3 A. She brought -- I told her when she moved in  
 4 for that one week I told her do not bring anyone into  
 5 this house. She brought a man into my house. I opened  
 6 her bedroom door, found her giving him oral sex. I got  
 7 angry. I said, please leave. She was on drugs.  
 8 She got angrier and came into the bathroom  
 9 and hit me or tried to hit me on my head. So, I  
 10 pretty much held her down until the cops came  
 11 because I called the cops to get her out.  
 12 Q. Was it an upsetting event to you?  
 13 A. No. I just couldn't wait for her to get out.  
 14 Q. Was that a common thing for you to have  
 15 fistfights with other women?  
 16 A. No. I didn't throw a fist. No, it was not a  
 17 common thing.  
 18 Q. And did she threaten you on the way out?  
 19 A. Yes.  
 20 Q. And you said she was in a gang?  
 21 A. Yeah.  
 22 Q. And what did she tell you on the way out?  
 23 A. Oh, I don't remember. I'm going to regret it.  
 24 Q. Well, did she say, I am going to get you,  
 25 bitch?

1 arrived, he started pushing and shoving his mother into  
 2 the car. I could tell that he was on drugs. So, I said  
 3 this is uncalled, uncalled for. I called the cops and  
 4 that was that. He ran. I guess you can say I have a  
 5 good heart and I give the wrong people chances.  
 6 Q. Well, that was one incident when, when the  
 7 mother was present, right?  
 8 A. Yes, and that night actually --  
 9 Q. There was a second incident, was there  
 10 not?  
 11 A. Yes. That night he -- that's when he pushed  
 12 me down a couple times and that's when I hit him and  
 13 then he spit blood all over the house. And that's when  
 14 D, DCF got involved. So, I, three days later,  
 15 immediately moved out of the house and moved to Royal  
 16 Palm. And the next thing I know the week that I moved  
 17 to Royal Palm, he showed up at my house.  
 18 Q. Okay. Well, let's go through this slowly.  
 19 The first confrontation where his mother was  
 20 involved happened in November of '06; is that right?  
 21 A. If that's what the document says.  
 22 Q. Okay. And that's when he was pushing his  
 23 mother around and, and then he turned towards you  
 24 and pushed you around, right?  
 25 A. Yeah.

1 Q. Now, the second time there was a  
 2 confrontation was March 10th of '07?  
 3 A. Yes.  
 4 Q. And at that time that's when you got into,  
 5 what, was there, was there another incident the  
 6 evening of November '06 before we got to March of  
 7 '07?  
 8 A. Yeah. That's when he pushed me down.  
 9 Q. Okay. Then in March of '07, Mr. [REDACTED]  
 10 [REDACTED] smacked you and choked you, isn't that true?  
 11 A. Yes. Well, I moved specifically because of  
 12 him. I didn't want him in my life at all. And he found  
 13 out where I lived and he came to my residence, kicked  
 14 down the door and smacked me and choked me, yes.  
 15 Q. And, in fact, you filed for an injunction  
 16 against domestic violence on March 14th, '07,  
 17 against him, did you not?  
 18 A. Yes.  
 19 Q. And you claimed that you and he were  
 20 together for about six months, right?  
 21 A. Yes.  
 22 Q. He had problems with cocaine?  
 23 A. Yes.  
 24 Q. And then you and he took a break for a  
 25 couple of months, right?

1 A. Yes.  
 2 Q. And then he smashed glass all over your  
 3 house, right?  
 4 A. Yes.  
 5 Q. And then he took his fist and he hit you  
 6 across the left side of your face, right?  
 7 A. Yes.  
 8 Q. And then your mother came and he picked  
 9 her up and threw her across the kitchen, didn't he?  
 10 A. Yes.  
 11 Q. And then he smacked your roommate in the  
 12 face and threw her into the wall, is that right?  
 13 A. Yes.  
 14 Q. Was all of that traumatic to you?  
 15 A. That night.  
 16 Q. And you represented to the court under  
 17 oath that you feared for your life; is that right?  
 18 A. Yes.  
 19 Q. And you were very scared of him?  
 20 A. Yes.  
 21 Q. And he damaged you and your son. You felt  
 22 that both of you were in jeopardy; is that right?  
 23 A. Yes.  
 24 Q. And he also had knives and he told you he  
 25 had a gun in addition; is that right?

1 A. Yes.  
 2 Q. And then you got back together again,  
 3 right?  
 4 A. Yes.  
 5 Q. And you had great intimacy to use your  
 6 words, right?  
 7 A. Okay.  
 8 Q. But that he was very jealous.  
 9 A. Yes.  
 10 Q. Is that accurate?  
 11 A. Yes.  
 12 Q. And you also said that on March 10th, '07,  
 13 he got very violent. He was restraining you, and he  
 14 wouldn't let you get off your bed. Do you remember  
 15 that?  
 16 A. Yes.  
 17 Q. He wouldn't let you get to your phone,  
 18 would he?  
 19 A. Correct.  
 20 Q. And when you went into the room, in the  
 21 living room he grabbed you by your neck and dragged  
 22 you back into your bedroom. Do you remember that?  
 23 A. Yes.  
 24 Q. And then he slammed you on the bed on  
 25 several occasions, correct?

1 A. Yes.  
 2 MR. LUTTIER: Let's mark this as our next,  
 3 whatever number we're on.  
 4 THE COURT REPORTER: Five.  
 5 MR. LUTTIER: Five.  
 6 (Defendant's Exhibit No. 5 was marked for  
 7 identification.)  
 8 BY MR. LUTTIER:  
 9 Q. Let me show you what is now marked as  
 10 Exhibit 5 and ask you if that's a copy of the  
 11 Petition for Injunction Against Domestic Violence  
 12 that you filed? Is that your signature on that  
 13 Petition for Injunction Against Domestic Violence?  
 14 A. Yes.  
 15 Q. Now, this injunction references two  
 16 incidences, one dated November 23rd, '06 and one  
 17 dated March 10th, '07, right?  
 18 MR. EDWARDS: Same exhibit?  
 19 MR. LUTTIER: Yeah.  
 20 BY MR. LUTTIER:  
 21 Q. Correct?  
 22 A. Yes.  
 23 Q. Now, there was another incident that  
 24 happened April 2nd of '07, wasn't there?  
 25 A. Yes.

1 Q. And on that --  
 2 A. This is, this is the day that he found me at  
 3 my new house.  
 4 Q. That's April 2nd of '07 is when he found  
 5 you in your new house?  
 6 A. Yes.  
 7 Q. And he forced himself in?  
 8 A. Yes.  
 9 Q. And you were in your new house with your  
 10 son, correct?  
 11 A. Yes.  
 12 Q. Now, this incident scared you, didn't it?  
 13 A. Yeah.  
 14 Q. I mean, he, he broke into your house. He  
 15 took you. He took a knife. He put it in front of  
 16 your face and said I could kill you and your son,  
 17 didn't he?  
 18 A. Yes.  
 19 Q. And you were, when the police arrived, you  
 20 were visibly shaking, you were crying and you were  
 21 holding your son; isn't that right?  
 22 A. I don't know if I was holding my son, but yes.  
 23 Q. All right. And you, you swore out a  
 24 complaint to have him prosecuted for aggravated  
 25 battery and false imprisonment, right?

1 A. Yes.  
 2 Q. And then he threw the knife?  
 3 A. Yes.  
 4 Q. Then he picked you up --  
 5 MR. LUTTIER: Or strike that.  
 6 BY MR. LUTTIER:  
 7 Q. And at that point you were seriously in  
 8 fear for your son's and your life?  
 9 A. Yes.  
 10 MR. LUTTIER: Let me mark that as 6, our  
 11 next. And ask you if you can identify this  
 12 document.  
 13 (Defendant's Exhibit No. 6 was marked for  
 14 identification.)  
 15 THE WITNESS: I've had some crazy  
 16 boyfriends, but for three years everything's  
 17 been fine.  
 18 BY MR. LUTTIER:  
 19 Q. Let me show you what has been marked as  
 20 Exhibit 6. Is that a copy of the Petition for  
 21 Injunction Against Domestic Violence that you filed?  
 22 A. What about it?  
 23 MR. EDWARDS: He was just showing it to  
 24 you.  
 25 THE WITNESS: Yes, I saw it before.

1 A. Yes.  
 2 Q. I mean, this guy scared you, didn't he?  
 3 A. Yeah.  
 4 Q. And you filed an injunction for domestic  
 5 violence on that incident on April 17th of '07?  
 6 A. Yes.  
 7 Q. Did you say yes?  
 8 A. Yes.  
 9 Q. And there you said under oath, that he  
 10 kicked your door in at 3:00 in the morning, rushed  
 11 in your son's room, grabbed him up and took him in  
 12 the bathroom; is that right?  
 13 A. Yes.  
 14 Q. That scared you, didn't it?  
 15 A. Yes, it did.  
 16 Q. And after you got up and he grabbed the  
 17 knife, he then kept you from getting off your bed  
 18 and told you he was going to kill you, didn't he?  
 19 A. Yeah.  
 20 Q. And then he said he was going to kill your  
 21 son, right?  
 22 A. Yes.  
 23 Q. And he told you he was going take your  
 24 insides of your body and shove them down your  
 25 throat, didn't he?

1 BY MR. LUTTIER:  
 2 Q. Is that the copy of the petition that you  
 3 filed. That is it has your signature on it?  
 4 A. Yep.  
 5 Q. And then in August of '07, you then had a  
 6 domestic violence situation with your then new  
 7 boyfriend, [REDACTED] did you not?  
 8 A. Yeah.  
 9 Q. And [REDACTED] had grabbed you by the arm  
 10 and pulled you through the house; is that right?  
 11 A. Yeah.  
 12 Q. And then he picked you up and brought you  
 13 upstairs and wouldn't let you come down; is that  
 14 correct?  
 15 A. Yes.  
 16 Q. He literally picked you up and took you up  
 17 the stairs?  
 18 A. He made sure I got up the stairs, yeah.  
 19 Q. How did he do that?  
 20 A. He like grabbed my waist and make sure I went  
 21 upstairs.  
 22 Q. And why was he taking you upstairs?  
 23 A. Because he did not want me to be downstairs.  
 24 Q. Okay. And your son was present for this,  
 25 right?

35 (Pages 635 to 638)

1 A. He was sleeping.  
 2 Q. Okay. And as a result of that incident,  
 3 you were afraid, correct?  
 4 A. Yes.  
 5 Q. You had --  
 6 A. Because I went through it before.  
 7 Q. You what?  
 8 A. Because I went through it before.  
 9 Q. And you swore out a complaint for a  
 10 battery against him, did you not?  
 11 A. Yes.  
 12 MR. LUTTIER: I need to take a quick  
 13 break.  
 14 THE VIDEOGRAPHER: Going off the record at  
 15 4:19 p.m.  
 16 (A brief recess was held.)  
 17 THE VIDEOGRAPHER: We're back on the  
 18 record at 4:30 p.m.  
 19 BY MR. LUTTIER:  
 20 Q. Do you actually, yourself, call  
 21 Mr. Epstein's home asking him if you could come  
 22 work, did you not?  
 23 MR. EDWARDS: Object to the form,  
 24 predicate, time-frame.  
 25

1 A. No.  
 2 Q. Do you know if any of them have consulted  
 3 with any lawyers about that other than your lawyers?  
 4 A. No. What they want to sue me along with  
 5 Jeffrey?  
 6 Q. Have you ever discussed yourself with them  
 7 their feelings about you having taken them to see  
 8 Mr. Epstein?  
 9 A. Yeah.  
 10 Q. And what did they tell you?  
 11 A. Jane Doe is very sensitive towards it. She  
 12 didn't like it at all. She just was a poor little girl  
 13 that I guess was influenced by me to go to Jeffrey's  
 14 house.  
 15 Q. But I mean has she ever asked you why did  
 16 you do that knowing what you knew or anything like  
 17 that or said she holds you responsible?  
 18 A. In a way. I don't know the exact words but  
 19 she's definitely came to me and said why would you even  
 20 do that, why would we go there? You know, it, it hurts  
 21 our self-esteem.  
 22 And in [REDACTED]'s aspect she was extremely  
 23 scared to go the first time. And me being one of  
 24 her best friends at the time, she just finally went  
 25 after I begged her many times when I couldn't find

1 BY MR. LUTTIER:  
 2 Q. During this period of time that you were  
 3 going to see Mr. Epstein. Sometimes you called and  
 4 asked his people at his house whether, you know, you  
 5 could come work, did you not?  
 6 A. Yeah. Because he told me to call if I had a  
 7 girl. So, I would call and ask is he available.  
 8 Q. Now, I want to ask you a couple questions  
 9 about your two friends, Jane Doe and again [REDACTED].  
 10 A. Excuse me.  
 11 Q. You took Jane Doe to Mr. Epstein, did you  
 12 not?  
 13 A. Yes, I did.  
 14 Q. How many times did you take her?  
 15 A. I don't know.  
 16 Q. Has Jane Doe or [REDACTED] or anyone else that  
 17 you took to Mr. Epstein discussed with you or anyone  
 18 else that you know of the potential for them suing  
 19 you?  
 20 A. Who suing me?  
 21 Q. Any girl that you took to Mr. Epstein.  
 22 A. No.  
 23 Q. Do you know if any of them talked to their  
 24 lawyers about suing you as a result of you taking  
 25 them to see Mr. Epstein?

1 any other girl. And no, they both didn't like it.  
 2 Who would like it?  
 3 Q. Did you have any friends better than [REDACTED].  
 4 You know, would you consider her, she was your best  
 5 friend, or is your best friend?  
 6 A. At that time, no.  
 7 Q. Who is your best friend now?  
 8 A. [REDACTED].  
 9 Q. How about now?  
 10 A. My son.  
 11 Q. Okay. Other than your son, a friend not  
 12 family. Is she, is she your best friend still?  
 13 A. Jesus, myself, my son. Why are you looking at  
 14 me crazy?  
 15 Q. Is she your best friend was the question.  
 16 A. I don't have a best friend. Actually, yes, I  
 17 do. Faith Skyman.  
 18 Q. Who?  
 19 A. Faith.  
 20 Q. Who is she?  
 21 A. My son's God mother.  
 22 Q. Is she another person that is suing Jeff  
 23 Epstein?  
 24 A. Nope. She was affiliated with [REDACTED]  
 25 who died.

1 Q. What, Faith Skyman, S-k-y-m-a-n?  
 2 A. Yeah.  
 3 Q. How was she affiliated with [REDACTED]  
 4 [REDACTED]?  
 5 A. She was good friends with her and I met  
 6 [REDACTED] through her. And I took [REDACTED]  
 7 to Jeffrey Epstein's house.  
 8 Q. Where does Faith Skyman live?  
 9 A. Rhode Island.  
 10 Q. Do you have the phone number for this  
 11 babysitter you say you use?  
 12 A. Yes.  
 13 Q. Debra Carrol?  
 14 A. Yes.  
 15 Q. What's her number?  
 16 A. I don't know it off the top of my head.  
 17 Q. Is she listed in the phone book?  
 18 A. Probably.  
 19 Q. Is she -- you say she lives in the  
 20 Acreage?  
 21 A. Yes.  
 22 Q. Is she married?  
 23 A. No.  
 24 Q. Have you ever been to her house?  
 25 A. Yeah.

1 Q. Does she rent, does she own, do you know?  
 2 A. No.  
 3 Q. Live alone or with somebody else?  
 4 A. Her brother.  
 5 Q. Same last name --  
 6 A. I don't know.  
 7 Q. -- as her and her brother, last name is  
 8 Carrol?  
 9 A. I don't know.  
 10 THE VIDEOGRAPHER: Your mic is on your  
 11 chair.  
 12 BY MR. LUTTIER:  
 13 Q. Now, you've told us when you believe you  
 14 first went to Jeffrey Epstein and when you went the  
 15 last time. If I -- and I may have asked you at the  
 16 last deposition: You have no physical proof of when  
 17 you actually went, right, the actual dates that you  
 18 went?  
 19 MR. EDWARDS: Object to the form.  
 20 MR. LUTTIER: That would be like a  
 21 calendar or notes, something like that.  
 22 MR. EDWARDS: Form.  
 23 THE WITNESS: Nope.  
 24 BY MR. LUTTIER:  
 25 Q. And you have no physical proof of how many

1 times you actually went?  
 2 MR. EDWARDS: Form.  
 3 THE WITNESS: What does that mean?  
 4 MR. EDWARDS: Answer if you know what that  
 5 means. Do you have physical proof, videotape.  
 6 Answer his question if you know what the answer  
 7 is.  
 8 THE WITNESS: No. No one videotaped me  
 9 and no, we didn't keep a log, no.  
 10 BY MR. LUTTIER:  
 11 Q. There is no record that you could consult  
 12 that would say I know I went 21 times or exactly how  
 13 many times because you kept a record of it?  
 14 MR. EDWARDS: Form.  
 15 THE WITNESS: No.  
 16 MR. EDWARDS: This is outside of whatever  
 17 records are in your client's possession.  
 18 BY MR. LUTTIER:  
 19 Q. And since you and Jane Doe and [REDACTED] are  
 20 all represented by the same lawyer, do you recognize  
 21 that there is an inherent conflict among the three  
 22 of you in terms of any accusations that [REDACTED] and  
 23 Jane Doe would have against you for taking them to  
 24 Mr. Epstein?  
 25 MR. EDWARDS: Object to the form.

1 THE WITNESS: I don't understand what the  
 2 hell --  
 3 BY MR. LUTTIER:  
 4 Q. There is a conflict of interest.  
 5 Mr. Edwards can't represent one, one client suing  
 6 another one of his clients; you recognize that,  
 7 don't you?  
 8 MR. EDWARDS: Form.  
 9 THE WITNESS: Okay.  
 10 BY MR. LUTTIER:  
 11 Q. Have you seen Jane Doe's deposition?  
 12 A. No.  
 13 Q. Have you been told anything about it?  
 14 A. No.  
 15 Q. Have you been told anything about [REDACTED]  
 16 [REDACTED] case?  
 17 A. No.  
 18 Q. Who is actually representing you now? Do  
 19 you know the name of the law firm that now  
 20 represents you?  
 21 A. Whatever this law firm's called.  
 22 Q. Is it -- did you sign a new fee agreement  
 23 with the new law firm?  
 24 A. Yes.  
 25 Q. So, it's whatever firm Brad Edwards is now

1 with?  
 2 A. Yes.  
 3 Q. And did you ever meet any of the people  
 4 from the Rothstein, Adler firm?  
 5 A. No.  
 6 Q. Did you meet any investigators from the  
 7 Rothstein, Adler firm?  
 8 A. No.  
 9 Q. Have you ever been interviewed by any of  
 10 the investigators from there?  
 11 A. No.  
 12 Q. Do you know a man by the name of Jay  
 13 Hawell?  
 14 A. No.  
 15 Q. Have you ever heard of his name?  
 16 A. Of Jay Hawell?  
 17 Q. Jay Hawell, H-a-w-e-l-l.  
 18 A. No.  
 19 Q. Do you have this babysitter's phone number  
 20 in your cellphone?  
 21 A. No. I don't keep it in my cellphone.  
 22 Q. You, you don't keep your babysitters  
 23 number in your cellphone?  
 24 A. No.  
 25 Q. And you don't have it memorized?

1 A. Okay. I have to pick my son up by 6 so --  
 2 MR. EDWARDS: We'll be done.  
 3 BY MR. LUTTIER:  
 4 Q. At the beginning of this deposition you  
 5 asked a question about whether or not somebody else  
 6 was going to be here I think on behalf of you. And  
 7 you made some reference to somebody you had met with  
 8 about this deposition. Do you recall making that  
 9 statement, asking whether or not this other person  
 10 was going to be here?  
 11 A. Uh-huh, yes.  
 12 Q. Who were you referring to?  
 13 A. His name is -- I don't know his name.  
 14 Q. Is it a lawyer?  
 15 A. He's an attorney.  
 16 Q. Not a paralegal. A guy named Farmer,  
 17 Mr. Farmer?  
 18 A. I don't know.  
 19 Q. Have you met this other person?  
 20 A. Yes.  
 21 Q. Where did you meet this other person?  
 22 A. At the law firm.  
 23 Q. Mr. Edward's law firm?  
 24 A. Yes.  
 25 Q. Down in Fort Lauderdale?

1 A. No.  
 2 Q. So, what do you have to do when you want  
 3 to call a babysitter?  
 4 A. It's at home.  
 5 Q. So, if you're out and about and you need  
 6 to call the babysitter and tell her you'll be --  
 7 A. I usually keep it in my purse.  
 8 Q. -- there late you don't have any way to do  
 9 that until you get home?  
 10 A. I usually keep it in my purse and I am not  
 11 late.  
 12 Q. Where do you keep it? Do you have a phone  
 13 book in your purse?  
 14 A. No. I have a piece of paper with her number.  
 15 Q. Okay. Do you have that with you here  
 16 today?  
 17 A. No.  
 18 Q. So, as you sit here today you do not have  
 19 on your person anywhere Ms. Carrol's phone number;  
 20 is that right?  
 21 A. I do not have her number with me, no.  
 22 Q. Do you know somebody by the name of Paul  
 23 Cassel (phonetic)?  
 24 A. No. What time is it?  
 25 Q. 4:41.

1 A. Yes.  
 2 Q. So, you've been down to his new law firm?  
 3 A. Yes.  
 4 Q. Did you review anything in preparation for  
 5 today's deposition?  
 6 A. Yesterday I talked to my attorney.  
 7 Q. Did you review any documents?  
 8 A. I reviewed a document, yes.  
 9 Q. What document?  
 10 A. I don't know. I don't know what document,  
 11 sir. Sorry.  
 12 Q. You say you reviewed a document or  
 13 documents?  
 14 A. I reviewed a document.  
 15 Q. One piece of paper?  
 16 A. A few, a few pieces of paper.  
 17 Q. Okay. What were they? What did they have  
 18 on them?  
 19 MR. EDWARDS: Objection as to this line of  
 20 questioning calls for attorney-client privilege  
 21 information. She's not going to answer it as  
 22 to exactly what we went over in preparation for  
 23 the deposition.  
 24 BY MR. LUTTIER:  
 25 Q. Other than notes created by your lawyer

1 which I don't want to know about, did you review any  
 2 other documents in preparation for your deposition?  
 3 A. No. I have to be out of here at 5:30.  
 4 Q. Are you aware of the fact that the U.S.  
 5 attorney has alleged that your, the firm that  
 6 represented you initially, the Rothstein, Adler  
 7 firm, they've, they've alleged that it was a  
 8 criminal enterprise?  
 9 A. I heard that they did some naughty acts, yeah.  
 10 MR. EDWARDS: Form.  
 11 BY MR. LUTTIER:  
 12 Q. And that the head of their firm was  
 13 charged with criminal racketeering?  
 14 A. Yes.  
 15 Q. Did you ever hear any specifics about  
 16 that, why they were charged with those things?  
 17 A. Some guy took some money. I don't know. I  
 18 don't care.  
 19 Q. Did you hear where, where he was getting  
 20 the money from?  
 21 A. No.  
 22 Q. Did you ever hear anything about how your  
 23 case may have been involved in any of that?  
 24 A. No. It's irrelevant to me right now.  
 25 Q. Does that mean you have never heard

1 in the garbage.  
 2 Q. Well, at the time we took your deposition  
 3 in September, you told us under oath that it was at  
 4 your home. Did you do something with it since --  
 5 A. No.  
 6 Q. -- your deposition on September 24th?  
 7 A. No.  
 8 Q. Well, it just didn't disappear, did it?  
 9 MR. EDWARDS: Form.  
 10 THE WITNESS: No. Are you being sarcastic  
 11 with me?  
 12 BY MR. LUTTIER:  
 13 Q. No. I mean you had to do something with  
 14 it, right?  
 15 MR. EDWARDS: Form.  
 16 THE WITNESS: I didn't touch it. I can't  
 17 find it. I don't know where it is. It's not  
 18 in the house, so, sorry.  
 19 BY MR. LUTTIER:  
 20 Q. Well, where did you think it was when you  
 21 testified definitively that it was in your home?  
 22 A. I thought it was in a couple of my papers that  
 23 I have and it's not. I thought it was where my Social  
 24 Security card was. It's not there, sir. End of  
 25 discussion.

1 anything or you just disregarded what you heard?  
 2 A. I disregarded what I heard.  
 3 Q. So, what did you hear?  
 4 MR. EDWARDS: You're asking her though  
 5 what she heard outside of any conversation with  
 6 me obviously?  
 7 MR. LUTTIER: Yeah, oh, yeah. I don't  
 8 want you to tell me, I don't want you to ever  
 9 tell me anything your lawyer told you.  
 10 THE WITNESS: Oh, no, I didn't hear  
 11 nothing.  
 12 BY MR. LUTTIER:  
 13 Q. Okay. Now, in your previous deposition  
 14 you indicated that you had a book. I think you said  
 15 it had a red -- it was a red book. I don't remember  
 16 if the color was right and you said it had a Bible  
 17 verse on it. Do you remember that testimony?  
 18 A. Yes.  
 19 Q. And at that deposition you told us  
 20 definitively that you had that at your home?  
 21 A. Yes.  
 22 Q. Where is that book now?  
 23 A. I can't find it. It's nowhere to be found.  
 24 Q. Well, what did you do with it?  
 25 A. I don't know. I moved a lot so it's probably

1 Q. Do you know the names of any of your  
 2 clients that you had when you were working -- other  
 3 than the ones you've already identified here,  
 4 clients you had when you were working for any of the  
 5 escort services?  
 6 A. No. Why would they want me to know their  
 7 names? I don't want to know their names either.  
 8 Q. I have no idea.  
 9 A. They have wives.  
 10 Q. All your clients have wives?  
 11 A. Probably. We don't -- it's not about  
 12 relationships, man. It's about --  
 13 Q. When you were working for those --  
 14 A. -- money and out.  
 15 Q. -- escort services, you were performing  
 16 sexual favors for their clients?  
 17 A. Okay. What about it?  
 18 MR. EDWARDS: Form.  
 19 MR. LUTTIER: Right?  
 20 MR. EDWARDS: Form.  
 21 BY MR. LUTTIER:  
 22 Q. Did that give you any cause for any guilt  
 23 or feel bad about the fact that you were out having  
 24 sex with married men?  
 25 A. Of course.

1 Q. Well, why did you do it?  
 2 A. That's all I know. It's what Jeffrey taught  
 3 me.  
 4 Q. Did you -- well, you could have had sex  
 5 with single people, couldn't you?  
 6 A. Yeah.  
 7 Q. Well, Jeffrey wasn't married, was he?  
 8 A. I don't know.  
 9 Q. Well, did you ever ask him?  
 10 A. He lied to me about everything.  
 11 Q. Did you ever ask him?  
 12 A. Yeah, I think I did.  
 13 Q. And what did he tell you?  
 14 A. He said no.  
 15 Q. Do you have any information that Jeffrey  
 16 Epstein is married?  
 17 A. No.  
 18 Q. Do you have any information that he was  
 19 ever married when you were --  
 20 A. No, and I don't care.  
 21 Q. So, you would agree with me that giving  
 22 massages to a single man is different than having  
 23 sexual intercourse with a married man, wouldn't you?  
 24 A. Yeah, it's wrong.  
 25 Q. And --

1 And you know I don't want to do this in the  
 2 future. I absolutely despise what I do. I  
 3 hate what I do. I don't want to do what I do.  
 4 This is what I have learned from Jeffrey  
 5 Epstein and I hate it, and I can't wait to get  
 6 out of it.  
 7 BY MR. LUTTIER:  
 8 Q. That's what you said in June of '09,  
 9 wasn't it?  
 10 A. Yeah.  
 11 Q. Didn't stop you, did it? You still went  
 12 ahead and you keep on doing the same thing you've  
 13 always done?  
 14 MR. EDWARDS: Form.  
 15 BY MR. LUTTIER:  
 16 Q. -- because you want the money, isn't that  
 17 right?  
 18 A. Yeah.  
 19 Q. That's the -- the bottom line is --  
 20 A. Well, actually I put myself through school  
 21 through it.  
 22 Q. The bottom line is --  
 23 A. I wanted to go back to school. Bottom line, I  
 24 wanted to go back to school so I did it to go to school.  
 25 Q. Well, have you saved up money to go to

1 A. It's wrong either way.  
 2 Q. So, wouldn't you agree with me, I mean,  
 3 doesn't the fact that you're out making a living,  
 4 having sexual relations with married men, cause you  
 5 any kind of grief or psychological trauma as opposed  
 6 to giving a massage to a single man?  
 7 A. Yes.  
 8 Q. So, how do you --  
 9 A. Actually --  
 10 Q. -- justify yourself of the fact that --  
 11 A. Married or single, it still causes me to feel  
 12 guilty about it. It's not the right thing to do.  
 13 Q. Well, how do you, how do you justify going  
 14 around getting paid money and taking men that you  
 15 know are married and having sex with them when you  
 16 know their wives don't know what you're doing?  
 17 A. How do you justify you sitting here  
 18 representing a pedophile? You know? You're silly. But  
 19 I'm sorry.  
 20 MR. LUTTIER: Move to strike?  
 21 THE WITNESS: I don't know.  
 22 MR. LUTTIER: And now answer my question.  
 23 THE WITNESS: I have to go home every day  
 24 and put a poker face in front of my son. I  
 25 don't ever want him to know what I have done.

1 school?  
 2 A. Yes, I did.  
 3 Q. How much have you saved?  
 4 MR. EDWARDS: Form.  
 5 THE WITNESS: It's none of your business.  
 6 BY MR. LUTTIER:  
 7 Q. Where's the money?  
 8 A. None of your business.  
 9 MR. EDWARDS: Form.  
 10 BY MR. LUTTIER:  
 11 Q. Got it in a bank account?  
 12 MR. EDWARDS: Form.  
 13 THE WITNESS: It's none of your business.  
 14 BY MR. LUTTIER:  
 15 Q. Well, how are we going to test the  
 16 credibility of what you say when you say you saved  
 17 money unless we know where it is?  
 18 A. Who cares? Who gives a shit if you, if I save  
 19 money or not and if I -- you know, the money I saved,  
 20 who cares. You got money?  
 21 Q. Well, your justification as I understand  
 22 it for doing what you do is so that you can save  
 23 money to go to school, is that right?  
 24 A. Yeah, and so my son can go to Christian  
 25 school.

1 Q. So, I am asking you, did you save money  
2 and if so where is the money?  
3 MR. EDWARDS: Form.  
4 THE WITNESS: Yeah. I saved money and  
5 it's under my bed.  
6 MR. EDWARDS: Don't be sarcastic. Just  
7 give him an answer, the truth.  
8 THE WITNESS: No, I'm not. It's under my  
9 bed with rubber-bands.  
10 BY MR. LUTTIER:  
11 Q. All right. Well, how much have you saved  
12 then since it's under your bed?  
13 MR. EDWARDS: Object to the form.  
14 BY MR. LUTTIER:  
15 Q. How much have you saved?  
16 MR. EDWARDS: Form, asked and answered.  
17 Harassing at this point.  
18 BY MR. LUTTIER:  
19 Q. Do you have a record of it anywhere?  
20 A. Nope. I have headache.  
21 Q. Have you ever applied, applied for  
22 financial assistance at any college or university?  
23 A. Yes.  
24 Q. Where did you apply for assistance?  
25 A. Through the Academy of Health and Beauty.

1 Q. And did you get any financial aide?  
2 A. Yep.  
3 Q. What?  
4 A. Yeah.  
5 Q. Was that the loan you described earlier?  
6 A. Yes.  
7 Q. So, you have been able to finance your  
8 education by simply applying for financial aide?  
9 A. Correct.  
10 Q. So, you didn't have to do what you're  
11 doing in order to go to college.  
12 A. I had to finance and then I had to make the  
13 money back to pay for it. I don't have a mommy and  
14 daddy that takes care of me and I am not going to be  
15 working at Burger King.  
16 Q. What's wrong with working at Burger King?  
17 A. You make \$7 an hour.  
18 Q. And that's really why you do what you want  
19 to do is you don't want to go get a job that pays  
20 less than the amount of money you can make doing  
21 what you do, isn't that right?  
22 A. No, you're wrong.  
23 MR. EDWARDS: Object to the form.  
24 BY MR. LUTTIER:  
25 Q. You could go work at Burger King, right?

1 A. I could.  
2 Q. How many jobs have you applied for?  
3 A. I used to work at Revitese Day Spa being an  
4 esthetician.  
5 Q. How many -- in the last two years, how  
6 many jobs have you applied for?  
7 A. I actually worked under the table for the Post  
8 Office sending out things for amazon.com. I do side  
9 jobs. I do cleaning jobs. There is a lot of jobs I do  
10 to make money.  
11 Q. First of all, my question was how many  
12 jobs have you applied for in the last two years?  
13 A. In the last two years probably five, and I  
14 have got them all.  
15 Q. Okay. Where did you, where did you put in  
16 your applications for these five jobs?  
17 A. One for a personal place, amazon.com.  
18 Q. What do you mean a personal place?  
19 A. Amazon.com and then E-Bay.  
20 Q. Wait a minute. Is, is the personal place  
21 that you applied something different than  
22 amazon.com?  
23 A. No. It's just amazon.com.  
24 Q. So, the big company, amazon.com, you  
25 submitted an application?

1 A. Yeah.  
2 Q. And did you get hired?  
3 A. Yep.  
4 Q. Okay. How much did they pay you?  
5 A. Fifteen bucks an hour.  
6 Q. So, you were able to get jobs in the labor  
7 market just like everybody else, right?  
8 A. Yeah.  
9 Q. Where else did you apply?  
10 A. I have applied Revitese Day Spa.  
11 Q. Where?  
12 A. Revitese Day Spa.  
13 Q. Okay. In the last two years?  
14 A. Yeah.  
15 Q. And did you get hired?  
16 A. Yep.  
17 Q. And how much did they pay you?  
18 A. Twelve an hour.  
19 Q. Okay. So, you can get that job. Are you  
20 still working for amazon.com?  
21 A. No.  
22 Q. Why did you quit?  
23 A. It was seasonal.  
24 Q. Are you still forking for Revitese Day  
25 Spa?

41 (Pages 659 to 662)

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1 A. Nope.  
 2 Q. Why did you quit?  
 3 A. The economy just went down and she only could  
 4 hire me three days out of the week so --  
 5 Q. Where else did you apply in the last two  
 6 years?  
 7 A. I always sell stuff on ebay.  
 8 Q. Well, that's not an application, is it?  
 9 A. Well, you got to sign up to get on ebay.  
 10 Q. That's just you selling stuff that you  
 11 have on ebay?  
 12 A. Okay. Well, if that's how you want it.  
 13 Q. Where else have you applied for a job?  
 14 A. I've been at Petco and they paid me under the  
 15 table.  
 16 Q. When did you apply for a job at Petco?  
 17 A. Last year.  
 18 Q. What did you do for them?  
 19 A. I washed the dogs.  
 20 Q. Okay. How much did you get paid?  
 21 A. That was like \$9 an hour.  
 22 Q. Okay. Where else did you apply?  
 23 A. Cats Gymnastics.  
 24 Q. What did you do there?  
 25 A. I was one of the instructors for the four and

1 five-year-old group.  
 2 Q. And, and how much did you get paid for  
 3 that?  
 4 A. Nine dollars an hour.  
 5 Q. And are you still working there?  
 6 A. No.  
 7 Q. Why not?  
 8 A. Because it's not paying the bills.  
 9 Q. So, you quit?  
 10 A. Yeah.  
 11 Q. Did you quit Petco?  
 12 A. No.  
 13 Q. Did they fire you?  
 14 A. No.  
 15 Q. Still there?  
 16 A. No.  
 17 Q. What happened?  
 18 A. They, they just needed help for a couple  
 19 months.  
 20 Q. Okay. Any other places you have applied  
 21 for jobs?  
 22 A. I clean houses --  
 23 Q. For who?  
 24 A. -- once in a while. For people.  
 25 Q. How much do you get paid to clean a house?

1 A. Ten dollars an hour.  
 2 Q. And when was the last time you did that?  
 3 A. Like before I went to New York.  
 4 Q. And whose houses, did you clean the same  
 5 clients' houses?  
 6 A. It's just actually friends' houses.  
 7 Q. Anyplace else you've applied for work?  
 8 A. No, that I can recall.  
 9 Q. You said you worked for the U.S. Postal  
 10 Service. Did I hear that?  
 11 A. Well, that was for, that's incorporated with  
 12 amazon.com.  
 13 Q. The United States Post Office never  
 14 employed you, did they?  
 15 A. That is in -- intertwined with amazon.com.  
 16 Q. My -- listen to my question. The United  
 17 States Post Office never employed you, did they?  
 18 A. No. I didn't apply for the U.S. Post Office,  
 19 so they couldn't deny me.  
 20 Q. Well, you suggested they were paying you  
 21 under the table. The United States Post Office  
 22 never paid you under the table.  
 23 A. I never, I never worked for the U.S. Post  
 24 Office, sir. So keep on bring it up so we can keep on  
 25 going over it again.

1 THE WITNESS: What time is it?  
 2 MR. EDWARDS: You got time. It's 5.  
 3 BY MR. LUTTIER:  
 4 Q. Do you still have an adult entertainment  
 5 license?  
 6 A. Yep.  
 7 Q. Is it current?  
 8 A. I don't know. I don't use it.  
 9 Q. Were you provided with a copy of a  
 10 document that's called a proposal for settlement in  
 11 this case?  
 12 A. I don't know. Was I?  
 13 Q. I mean I can show it to you. I don't want  
 14 to mark it on the -- I don't want to have it in the  
 15 record because I don't want it to be a -- but I will  
 16 show it to you so you can recognize the document.  
 17 Let me just show you the document.  
 18 A. You can't help me.  
 19 Q. Just go ahead and read it.  
 20 A. Jeffrey Epstein is not admitting, he is in  
 21 fact denying all liability or responsibility because he  
 22 did it --  
 23 THE COURT REPORTER: If you could read --  
 24 MR. EDWARDS: Just read it to yourself  
 25 because if you say the words, she has to take

1 them down.  
 2 THE WITNESS: Oh, okay. I don't want to  
 3 read anymore. I'm good.  
 4 BY MR. LUTTIER:  
 5 Q. Did you see that --  
 6 A. Yeah.  
 7 Q. Have you seen that before today?  
 8 A. You know what, send Jeffrey to jail for 20  
 9 years and then I will take zero dollars. I need  
 10 justice. I want what's fair for all of us, for all of  
 11 us girls.  
 12 Q. What you want is money, right?  
 13 A. No. I want justice and I want what's fair.  
 14 And what's fair is that he should serve jail time. He  
 15 didn't serve jail time for me and my girlfriends. He  
 16 sat with his little rich butt --  
 17 Q. And who told you that?  
 18 A. -- in a little office doing community service  
 19 which was probably nothing for him because money talks.  
 20 And you know what, I want justice. So, I tell you what,  
 21 give me no money right now and send Jeffrey to jail for  
 22 20 years, and I will walk out of here with a smile from  
 23 ear to ear.  
 24 Q. Have you ever gone to jail, ma'am?  
 25 A. Nope.

1 A. [REDACTED]  
 2 Q. Do you -- well, other than the fact that  
 3 you're out until 5:00 --  
 4 A. Actually, I am prescribed [REDACTED].  
 5 Q. Other, other than the fact that you're out  
 6 until 5:00 in the morning at strip clubs, do you  
 7 have any problem sleeping?  
 8 A. Oh, you're so cute. I have trouble sleeping  
 9 over Jeffrey, yeah.  
 10 Q. Well, I mean, it doesn't keep you from  
 11 going out to Spearmint Rhino's until 5:00 in the  
 12 morning, does it?  
 13 A. It keeps me up.  
 14 Q. Okay.  
 15 A. People got to do what you got to do. Just  
 16 like you got sit here and defend a child molester, you  
 17 know. I got sit here and go to Spearmint Rhino and make  
 18 money, too. What's the difference, right?  
 19 Q. Now, you testified last time that you were  
 20 a call girl with others. With whom else were you a  
 21 call girl?  
 22 A. Girls. I don't know.  
 23 Q. What are their names?  
 24 A. Fruity-Tutty. I don't know. They have stage  
 25 names. I really could not tell you.

1 Q. You don't know how long Mr. Epstein was in  
 2 jail, do you?  
 3 A. I heard he was in jail for 18 months but --  
 4 Q. You don't know what it was like in jail,  
 5 do you?  
 6 A. Oh, God. For Jeffrey, poor old Jeffrey, oh,  
 7 he went to jail because he molested over 100 little  
 8 girls. I hope he was molested or rapped, whatever the  
 9 definition is. He needs more torture than that, jail.  
 10 Yeah, he needs to stay in there for 20 years, not 18  
 11 months.  
 12 Q. What do you think you should do as a  
 13 result of you having taken a bunch of your best  
 14 friends and girlfriends and knowing exactly what was  
 15 going to happen in taking them to Jeffrey Epstein?  
 16 A. Call all of them and say, I am sorry, I was 13  
 17 years old, I apologize for being naive and a stupid  
 18 little girl and I hope that everybody can get  
 19 counseling. And I hope that everybody can get served  
 20 justice. I hope we can see Jeffrey's face in the  
 21 newspaper saying that finally this jerk-off is in jail  
 22 for 20 years, and now all of us can go to sleep  
 23 peacefully.  
 24 Q. [REDACTED]

1 Q. Well, did you guys work together?  
 2 A. A few times.  
 3 Q. And when you say you worked together, what  
 4 does that mean?  
 5 A. That we worked together.  
 6 Q. Does that mean the two of you would go out  
 7 with one person or you meant the two of you would  
 8 run a service together?  
 9 A. Run a service together, what does that mean?  
 10 Q. Well, I don't know. Tell me how you and  
 11 your, any other girl worked together in the escort  
 12 business or the call-girl business?  
 13 A. Either we would make, you know, we would  
 14 either call two guys and go out with two guys, have a  
 15 nice dinner, get paid for it, or we would go together  
 16 and have one guy pay for it or --  
 17 Q. Well, this is, your answer was we were all  
 18 call girls together. That means you were having sex  
 19 with guys, right?  
 20 MR. EDWARDS: Object to the form.  
 21 THE WITNESS: No.  
 22 BY MR. LUTTIER:  
 23 Q. Oh, a call girl to you doesn't indicate  
 24 you were having sex?  
 25 A. No, sir.

1 Q. Well, when you were, before you were doing  
 2 your escort service, when you were doing escort  
 3 services for others, you were having sex with your  
 4 clients, weren't you?  
 5 A. Sometimes. So, will Jeffrey go to jail for 20  
 6 years if he gives nobody money or he can't stand it?  
 7 Q. Have you sold any interest in this lawsuit  
 8 to anybody?  
 9 A. No.  
 10 Q. In other words have you received money  
 11 from anybody and in return given them an interest in  
 12 this lawsuit?  
 13 A. No.  
 14 Q. Have you received any money or any other  
 15 kind of consideration from any company with respect  
 16 to this lawsuit?  
 17 A. No.  
 18 Q. Any attorney with respect to this lawsuit?  
 19 A. No.  
 20 Q. Any other person with respect to this  
 21 lawsuit?  
 22 A. No.  
 23 Q. Have you been provided any money advances,  
 24 that is money --  
 25 A. No.

1  
 2 CERTIFICATE OF OATH  
 3 THE STATE OF FLORIDA  
 4 COUNTY OF PALM BEACH  
 5  
 6  
 7 I, the undersigned authority, certify that  
 8 [redacted] personally appeared before me and was duly  
 9 sworn on the 9th day of February, 2010.  
 10  
 11 Dated this 19th day of February, 2010.  
 12  
 13  
 14  
 15  
 16 *Cynthia J. Hopkins*   
 17 Cynthia Hopkins, RPR, FPR  
 18 Notary Public - State of Florida  
 19 My Commission Expires: February 25, 2011  
 20 My Commission No.: DD 643788  
 21  
 22  
 23  
 24  
 25

1 Q. -- as an advance against an outcome in  
 2 return for a sharing of the percentage of it?  
 3 A. No.  
 4 Q. Have you assigned any interest in this  
 5 lawsuit to anyone?  
 6 A. No.  
 7 MR. LUTTIER: Okay. I'm done. Any cross?  
 8 MR. EDWARDS: We'll read.  
 9 THE VIDEOGRAPHER: Going off the record at  
 10 5:05 p.m. This is the end of Tape 3 of the  
 11 deposition.  
 12 THE COURT REPORTER: Do you want to order  
 13 this?  
 14 MR. LUTTIER: Yes.  
 15 THE COURT REPORTER: Would you like a  
 16 copy?  
 17 MR. EDWARDS: Yes, please.  
 18 (Witness excused.)  
 19 (Deposition was concluded.)  
 20  
 21  
 22  
 23  
 24  
 25

1 CERTIFICATE  
 2 THE STATE OF FLORIDA  
 3 COUNTY OF PALM BEACH  
 4  
 5 I, Cynthia Hopkins, Registered Professional  
 6 Reporter, Florida Professional Reporter and Notary  
 7 Public in and for the State of Florida at large, do  
 8 hereby certify that I was authorized to and did  
 9 report said deposition in stenotype, and that the  
 10 foregoing pages are a true and correct transcription  
 11 of my shorthand notes of said deposition.  
 12 I further certify that said deposition was  
 13 taken at the time and place hereinabove set forth  
 14 and that the taking of said deposition was commenced  
 15 and completed as hereinabove set out.  
 16  
 17 I further certify that I am not attorney or  
 18 counsel of any of the parties, nor am I a relative  
 19 or employee of any attorney or counsel of party  
 20 connected with the action, nor am I financially  
 21 interested in the action.  
 22  
 23 The foregoing certification of this transcript  
 24 does not apply to any reproduction of the same by  
 25 any means unless under the direct control and/or  
 direction of the certifying reporter.  
 Dated this 19th day of February, 2010.  
 20  
 21 *Cynthia J. Hopkins*  
 22 Cynthia Hopkins, RPR, FPR  
 23  
 24  
 25

1 DATE: February 19th, 2010  
 2 TO: [REDACTED]  
 3 c/o BRAD J. EDWARDS, ESQUIRE  
 4 FARMER, JAFFE, WEISSING, EDWARDS  
 5 FISTOS & LEHRMAN, P.L.  
 6 425 North Andrews Avenue  
 7 Suite 2  
 8 Fort Lauderdale, Florida 33301  
 9 IN RE: [REDACTED] vs. Epstein  
 10 CASE NO.: 302008CA028051XXXXMB AB  
 11 Please take notice that on Tuesday, the 9th of  
 12 February, 2010, you gave your deposition in the  
 13 above-referred matter. At that time, you did not  
 14 waive signature. It is now necessary that you sign  
 15 your deposition.  
 16 As previously agreed to, the transcript will be  
 17 furnished to you through your counsel. Please read  
 18 the following instructions carefully:  
 19 At the end of the transcript you will find an  
 20 errata sheet. As you read your deposition, any  
 21 changes or corrections that you wish to make should  
 22 be noted on the errata sheet, citing page and line  
 23 number of said change. DO NOT write on the  
 24 transcript itself. Once you have read the  
 25 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.  
 Very truly yours,  
 Cynthia Hopkins, RPR, FPR  
 I do hereby waive my signature.  
 [REDACTED]

1 ERRATA SHEET  
 2 IN RE: [REDACTED] VS. EPSTEIN  
 3 CR: Cynthia Hopkins, RPR, FPR  
 4 DEPOSITION OF: [REDACTED]  
 5 TAKEN: February 9, 2010  
 6 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE  
 7 PAGE # LINE # CHANGE REASON  
 8 \_\_\_\_\_  
 9 \_\_\_\_\_  
 10 \_\_\_\_\_  
 11 \_\_\_\_\_  
 12 \_\_\_\_\_  
 13 \_\_\_\_\_  
 14 \_\_\_\_\_  
 15 \_\_\_\_\_  
 16 \_\_\_\_\_  
 17 Please forward the original signed errata sheet to  
 18 this office so that copies may be distributed to all  
 19 parties.  
 20 Under penalty of perjury, I declare that I have read  
 21 my deposition and that it is true and correct  
 22 subject to any changes in form or substance entered  
 23 here.  
 24 DATE: \_\_\_\_\_  
 25 SIGNATURE OF DEPONENT: \_\_\_\_\_

1 CERTIFICATE  
 2 ---  
 3 THE STATE OF FLORIDA  
 4 COUNTY OF PALM BEACH  
 5 I hereby certify that I have read the foregoing  
 6 deposition by me given, and that the statements  
 7 contained herein are true and correct to the best of  
 8 my knowledge and belief, with the exception of any  
 9 corrections or notations made on the errata sheet,  
 10 if one was executed.  
 11  
 12 Dated this \_\_\_\_ day of \_\_\_\_\_,  
 13 2009.  
 14  
 15  
 16  
 17  
 18  
 19 \_\_\_\_\_  
 20  
 21  
 22  
 23  
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 25