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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV-80893 MARR/JOHNSON

JANE DOE,
Plaintiff,

vs.

JEFFREY EPSTEIN,
Defendant.

1263 S.W. 21st Terrace
Miami, Florida 33145
Tuesday, June 15, 2010
4:06 p.m.

SWORN STATEMENT OF [REDACTED]

Taken before ELAINE CRANDALL, Registered
Professional Reporter and Notary Public in and for
the State of Florida at Large, pursuant to Notice
of Taking Unsworn Statement in the above cause.

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(305) 373-8404

2

1 APPEARANCES

2

3 FARMER, JAFFE, WEISSING, EDWARDS, FISTOS &

4 LEHRMAN

5 BY: BRADLEY EDWARDS, ESQ.

6 425 North Andrews Avenue, Suite 2

7 Fort Lauderdale, Florida 33301-3268

8 ALSO PRESENT:

9 MICHAEL FISTEN

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1 A. In his office.

2 Q. Related to what; modeling?

3 A. Working, yeah. Modeling.

4 Q. What, at that point in time, did you

5 know about Jean-Luc Brunel?

6 A. Nothing. At that time I didn't know

7 anything.

8 Q. So how did you meet with Jean-Luc Brunel

9 in his office in 1998?

10 A. Because there was a gentleman from

11 Switzerland who wanted to make business with them.

12 And I was hired by that gentleman to look through

13 all the accounts to make sure that -- you know,

14 they were kind of in bankruptcy. But he wanted to

15 know that his money, his investment, would be

16 good. So that's why I went. Like, an external

17 audit to do -- to see what was the income, the

18 expenses and something like that.

19 Q. Who is the guy from Switzerland?

20 A. I'm not going to tell you his name.

21 Q. Is that somebody who is still in touch

22 with Jean-Luc Brunel?

23 A. No. Not at all.

24 Q. What's the reason for not wanting to

25 disclose his name? Does he have anything to do

3

1 Thereupon--

2 [REDACTED]

3 was called as a witness by the Plaintiff and,

4 after having been first duly sworn, was examined

5 and testified as follows:

6 DIRECT EXAMINATION

7 BY MR. EDWARDS:

8 Q. Tell us your name.

9 A. [REDACTED]

10 Q. And just to the get to the point, you

11 know who Jeffrey Epstein is?

12 A. Yes.

13 Q. And you've met him before?

14 A. Yes.

15 Q. And you know who Jean-Luc Brunel is?

16 A. Yes.

17 Q. And you have met him before?

18 A. Yes.

19 Q. Which one did you meet first?

20 A. Jean-Luc Brunel.

21 Q. And where did you meet him?

22 A. In Miami Beach.

23 Q. When?

24 A. In 1998.

25 Q. And how?

5

1 with this case?

2 A. No. But I don't have permission. I

3 have to ask him.

4 Q. Okay. And after your meeting with

5 Jean-Luc Brunel in 1998 -- well, what company was

6 Jean-Luc Brunel with then?

7 A. Karin's Models, it was, at that time.

8 Q. K-A-R-I-N?

9 A. Yes.

10 Q. And is that the only other modeling

11 agency that you have known Jean-Luc Brunel to be

12 associated with, besides MC Squared?

13 A. Yes.

14 Q. And how long was Jean-Luc with Karin,

15 from 1998 through --

16 A. No, Jean-Luc was the owner of Karin's.

17 Before that. I think since 1986, in Paris.

18 Q. All right. And why was he no longer

19 affiliated with Karin at some point in time?

20 A. He closed -- he -- how you say -- he

21 made a dissolution. He dissolved the company.

22 Q. Were you ever hired to work with Karin?

23 A. I was hired to work with Karin's, yeah.

24 Q. When was that?

25 A. In 1998.

<p>6</p> <p>1 Q. What was your position?</p> <p>2 A. At that time, bookkeeper.</p> <p>3 Q. In Miami?</p> <p>4 A. Yes.</p> <p>5 Q. And how long did you stay as the</p> <p>6 bookkeeper in Miami for Karin?</p> <p>7 A. Until 2003, when they changed the</p> <p>8 company to MC Squared.</p> <p>9 Q. So when did the official change come</p> <p>10 from Karin to MC Squared?</p> <p>11 A. In 2003.</p> <p>12 Q. And when is the first time you met</p> <p>13 Jeffrey Epstein?</p> <p>14 A. I met Jeffrey Epstein only once in my</p> <p>15 life. And I believe it was in 2003. Two</p> <p>16 thousand -- yeah, by the end of 2003, 2004.</p> <p>17 Q. Where?</p> <p>18 A. In New York.</p> <p>19 Q. What was the occasion?</p> <p>20 A. It was the open party for MC Squared.</p> <p>21 Q. Where was that held?</p> <p>22 A. In a discotheque in Manhattan.</p> <p>23 Q. What discotheque?</p> <p>24 A. I don't know. I don't remember.</p> <p>25 Q. And did you meet Elaine Maxwell?</p>	<p>8</p> <p>1 Epstein owns or controls numerous apartments in</p> <p>2 that -- at that same address; is that right?</p> <p>3 A. Yes. Yes.</p> <p>4 Q. And have you ever been to that address?</p> <p>5 A. No.</p> <p>6 Q. And how do you know that he owns or</p> <p>7 controls numerous apartments at that address?</p> <p>8 A. Because at that time Evelyn Valenzeula</p> <p>9 was the office manager of the new and she was</p> <p>10 dealing personally with the assistant of Jeffrey</p> <p>11 Epstein. And she had to do the payments for the</p> <p>12 cable and, I believe, electricity.</p> <p>13 Q. And Evelyn -- who was the assistant of</p> <p>14 Jeffrey Epstein that Evelyn was dealing with?</p> <p>15 A. I don't know.</p> <p>16 Q. [REDACTED]</p> <p>17 A. I believe so.</p> <p>18 Q. Do you remember that name?</p> <p>19 A. Yes.</p> <p>20 Q. That's somebody who no longer lives</p> <p>21 here, right?</p> <p>22 A. I -- I believe I heard that, yeah.</p> <p>23 Q. Who did you hear that from?</p> <p>24 A. From Evelyn, from Conetta (phonetic).</p> <p>25 from</p>
<p>7</p> <p>1 A. I don't know her name. But he was</p> <p>2 with -- with a woman. I don't know.</p> <p>3 Q. And what is your understanding or what</p> <p>4 was your understanding that Jeffrey -- in terms of</p> <p>5 Jeffrey Epstein's involvement with MC Squared?</p> <p>6 A. Jean-Luc always said that Jeffrey was</p> <p>7 his friend, that he is a millionaire. And that</p> <p>8 Jeffrey was giving him the money to -- you know,</p> <p>9 loans or whatever -- and the apartments for the</p> <p>10 girls and things like that.</p> <p>11 Q. All right. Let's break that down.</p> <p>12 Giving money for what purpose? For furthering MC</p> <p>13 Squared?</p> <p>14 A. For -- for -- yeah, the money came to MC</p> <p>15 Squared, not to -- I don't know. Prior to 2003, I</p> <p>16 don't know if Jeffrey Epstein ever gave him money.</p> <p>17 I know that from the longest Jean-Luc was living</p> <p>18 in an apartment that belongs to Jeffrey Epstein.</p> <p>19 Q. What apartment is that?</p> <p>20 A. It's in New York. I don't know the</p> <p>21 address.</p> <p>22 Q. Is that at 301 East 66th Street?</p> <p>23 A. Yeah, something like that. I think it's</p> <p>24 that one.</p> <p>25 Q. And it's my understanding that Jeffrey</p>	<p>9</p> <p>1 Q. Okay. And at some point in time you</p> <p>2 came to know that the models were also staying in</p> <p>3 these apartments at 301 East 66th Street, right?</p> <p>4 A. I don't know specifically they stay at</p> <p>5 Jean-Luc's apartment. But I know that the models</p> <p>6 were staying in different apartments that belong</p> <p>7 to Jeffrey Epstein.</p> <p>8 Q. And what are the names of the models</p> <p>9 that were staying there, that you remember?</p> <p>10 A. Most of them. You know, at that time,</p> <p>11 when I was there who -- all the little girls.</p> <p>12 [REDACTED]</p> <p>13 Q. How do you spell that?</p> <p>14 A. [REDACTED] I -- you know, that was in</p> <p>15 2000-something. I don't recall all the names.</p> <p>16 But there is a list that you can get it from the</p> <p>17 office in New York.</p> <p>18 Q. A list --</p> <p>19 A. They have a list of models that they</p> <p>20 were staying in those apartments.</p> <p>21 Q. If I were to request it from the office</p> <p>22 in New York, what would I ask for?</p> <p>23 A. For the models' apartment list.</p> <p>24 Chargeback for models apartments.</p> <p>25 Q. Chargeback?</p>

3 (Pages 6 to 9)

10	<p>1 A. Yeah, because Jeffrey Epstein never 2 charged Jean-Luc for rent but Jean-Luc was 3 charging rent to the girls. And in her statements 4 it shows 301, 66 Apartment A, or Apartment B. And 5 he was charging them, like, a thousand dollars a 6 month.</p> <p>7 Q. How do you know that?</p> <p>8 A. Because I was doing the statements.</p> <p>9 Q. You were actually the one doing the 10 statements?</p> <p>11 A. Not all the time. I was in New York 12 starting 2003.</p> <p>13 Q. Through what date? You were in New York 14 from 2003 to --</p> <p>15 A. 2006.</p> <p>16 Q. And while you were in New York you were 17 working for MC Squared?</p> <p>18 A. Yes.</p> <p>19 Q. And what is the proof that you have seen 20 that Jeffrey Epstein was a partner or financial 21 supporter of MC Squared?</p> <p>22 A. I was the one who took the papers to 23 Mellon Bank.</p> <p>24 Q. That's in Miami?</p> <p>25 A. Yes. And Swetpaul (phonetic) -- I was</p>	12	<p>1 A. No, I don't know.</p> <p>2 Q. So in addition to his financial 3 guarantor on the Line of Credit of a million 4 dollars, what other involvement are you aware of 5 that Jeffrey Epstein had with MC Squared and/or 6 the apartments at 301 East 66th Street where the 7 models lived?</p> <p>8 A. They were planning on buying or 9 associating with a girl in -- in France for a -- 10 for a company. They were planning to do a 11 company. And, actually, I gave the paper to -- to 12 Mr. Shawn Connolly, which is an actual paper that 13 came from the office from Jeffrey Epstein, that he 14 was giving instructions to Jean-Luc saying that he 15 wanted to have the same contracts as -- uh, what's 16 his name, of Donald Trump, and that he wanted to 17 have the same kind of benefits for the scouts.</p> <p>18 So he was giving instructions to 19 Jean-Luc on what to do, what to -- there is a 20 woman in Paris, I don't recall her name, Frelit 21 (phonetic), I believe it was, and they were -- 22 they were, the three of them, trying to do a new 23 company. But then everything was, like, on zero. 24 They never -- they never did it together.</p> <p>25 Q. And do you know why?</p>
11	<p>1 talking at the time to Rich -- I believe his name 2 was Rich Gany. That was one of the other 3 assistants of Jeffrey Epstein.</p> <p>4 Q. Gany, G-A-N-Y?</p> <p>5 A. Yeah.</p> <p>6 Q. Do they call him Eric Gany?</p> <p>7 A. That is his name, yeah, Eric Gany. 8 That's his name. I recall some things, not all 9 the time. I recall that Mr. Epstein didn't want 10 to sign the papers, but Mellon Bank didn't want to 11 accept the Line of Credit if he didn't sign. So 12 we had to return the papers to New York so he 13 actually signed the documents.</p> <p>14 Q. And what was he actually signing, that 15 you remember? Signing over as a Line of Credit 16 or --</p> <p>17 A. As a line -- as the grantor of the Line 18 of Credit. Because the Line of Credit came from 19 J. P. Morgan directly, but he was the grantor. He 20 was the one who actually was responsible.</p> <p>21 Q. And how much was the Line of Credit?</p> <p>22 A. A million dollars, it was, at that time.</p> <p>23 Q. And did you ever keep track of whether 24 or not that line was extended or any additional 25 monies were given to MC Squared?</p>	13	<p>1 A. No.</p> <p>2 Q. Would you know the lady's name in Paris 3 if I --</p> <p>4 A. If you give it to me, yeah. If you give 5 me the name, I can recall.</p> <p>6 Q. Okay. While I'm looking for that, how 7 many girls that were models were living in the 8 apartments at any given time at 301 East 66th 9 Street?</p> <p>10 A. That's -- that's not only one apartment. 11 There are a lot of apartments there. There is not 12 only one girl. There is not only one apartment. 13 I believe there were, like, two or three 14 apartments. And they were put in between four 15 girls per apartment, I believe.</p> <p>16 Q. How many apartments?</p> <p>17 A. I believe there were, like, two or 18 three.</p> <p>19 Q. And there is four girls per apartment?</p> <p>20 A. Yeah.</p> <p>21 Q. And you know that because you saw the 22 documentation at MC Squared that showed where 23 these girls were living?</p> <p>24 A. Yes.</p> <p>25 Q. Did you also have something to do with</p>

4 (Pages 10 to 13)

14	<p>1 the visas that were prepared for the girls that</p> <p>2 were working?</p> <p>3 A. Yes. I was providing the names to the</p> <p>4 attorney. His name is Luis Font. He was doing</p> <p>5 the visas here in Miami. There was another --</p> <p>6 Valenzuela was handling directly the visas in New</p> <p>7 York. And only when she had problems, she hired</p> <p>8 another attorney. I don't know the name of the</p> <p>9 attorney in New York. But Luis Font is the --</p> <p>10 was, at that time, the attorney handling the visas</p> <p>11 for Miami.</p> <p>12 Q. Do you remember doing the visa for [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 A. No, that was done in New York by Eve</p> <p>15 Valenzuela.</p> <p>16 Q. And [REDACTED] visa, that you specifically</p> <p>17 remember being done, right?</p> <p>18 A. Yeah, I remember that. Because at one</p> <p>19 point, I believe, one of the renovations of her</p> <p>20 visa, something happened. And Mr. Epstein called</p> <p>21 the office while I was there and was really upset.</p> <p>22 And he spoke with Jean-Luc and they -- they were</p> <p>23 really nasty with Eve and, you know, it wasn't</p> <p>24 if -- it wasn't Eve's fault. It was their fault</p> <p>25 because they gave the wrong information. But, you</p>	16	<p>1 A. No.</p> <p>2 Q. Have you ever met her?</p> <p>3 A. No.</p> <p>4 Q. Have you ever met [REDACTED]</p> <p>5 (phonetic)?</p> <p>6 A. No.</p> <p>7 Q. You have only met Jeffrey Epstein once</p> <p>8 in person. How many times have you talked to him</p> <p>9 on the phone?</p> <p>10 A. Maybe once.</p> <p>11 Q. At some point in time you drove several</p> <p>12 girls or a number of girls over to Jeffrey</p> <p>13 Epstein's house; correct?</p> <p>14 A. Not me. Jean-Luc directly took them. I</p> <p>15 was making the arrangements to get a limousine or</p> <p>16 a car. And Jean-Luc himself was driving the girls</p> <p>17 to his house because he was having a party and</p> <p>18 there were supposed to be girls.</p> <p>19 Q. Which girls did he drive over there?</p> <p>20 A. One time I know he went with Mohini,</p> <p>21 with -- uh, what's her name? Four girls from</p> <p>22 Brazil, from the same agency. [REDACTED] is one of</p> <p>23 them because I remember her name. The other</p> <p>24 ones -- maybe if you --</p> <p>25 Q. Elena Weber?</p>
15	<p>1 know, she was only an employee and that's it.</p> <p>2 Q. How did [REDACTED] come into the</p> <p>3 country?</p> <p>4 A. By a model's visa, I believe.</p> <p>5 Q. And was she brought in specifically by</p> <p>6 Jeffrey Epstein or Jean-Luc or do you remember?</p> <p>7 A. Mr. Epstein was paying for the visas.</p> <p>8 But, you know, all the visas were done through --</p> <p>9 through Karin's or MC Squared. I believe she came</p> <p>10 with Karin's visa first, then everything</p> <p>11 transferred to MC Square. And I believe those</p> <p>12 visas were paid directly by Mr. Epstein.</p> <p>13 Q. How old was [REDACTED] when she</p> <p>14 first came?</p> <p>15 A. I don't know. I wasn't in New York at</p> <p>16 that time. Because I know she came prior to me</p> <p>17 getting involved in New York.</p> <p>18 Q. And you were involved in New York in</p> <p>19 2003?</p> <p>20 A. Yes.</p> <p>21 Q. So she came in some time before that?</p> <p>22 A. I believe so.</p> <p>23 Q. But even back in 2003, she still -- I</p> <p>24 don't know how old she is now. She's probably 24</p> <p>25 or 25, right; do you know?</p>	17	<p>1 A. No.</p> <p>2 Q. [REDACTED]</p> <p>3 A. No.</p> <p>4 Q. Do you know those two girls?</p> <p>5 A. Yes.</p> <p>6 Q. And were those girls somehow involved</p> <p>7 with Jean-Luc or the modeling agency?</p> <p>8 A. Yes.</p> <p>9 Q. They were both MC Squared models?</p> <p>10 A. Yes.</p> <p>11 Q. And at the time, when they began, how</p> <p>12 old were they; do you remember?</p> <p>13 A. I believe [REDACTED] was, like, 14, 15. And</p> <p>14 [REDACTED] was 13, 14, when she came.</p> <p>15 Q. Okay. And do you know where they are</p> <p>16 now, either one of them?</p> <p>17 A. I know [REDACTED] is in New York.</p> <p>18 Q. When is the last time you talked to her?</p> <p>19 A. In 2006.</p> <p>20 Q. How do you know she is in New York?</p> <p>21 A. Because I saw her pictures whenever. I</p> <p>22 believe she's in New York. I don't know if she</p> <p>23 really is in New York but I believe.</p> <p>24 Q. Elena Weber?</p> <p>25 A. Elena, the last time I saw her was in</p>

5 (Pages 14 to 17)

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<p style="text-align: right;">18</p> <p>1 2006, too. And, specifically, I don't know where 2 she is. But if she's in the United States, I 3 believe she's in New York. If not, she is in 4 Brazil or in Paris.</p> <p>5 Q. All right. Do you know this person in 6 Brazil, Cacha or Cache? C-A-C-H-A or C-A-C-H-E.</p> <p>7 A. No.</p> <p>8 Q. Here is a document that we obtained 9 related to information from Jeffrey Epstein's 10 computer system. It says Message Paris. It's in 11 a square there and it continues to the next page. 12 Tell me if you recognize any of those names.</p> <p>13 A. No. [REDACTED] is one of the girls 14 that went with [REDACTED] now that I'm seeing kind of 15 names. [REDACTED] is one of the other ones. If this is 16 [REDACTED] or [REDACTED] something like that, it's a 17 black girl that I believe she was -- she was not 18 underage but she was going out with one of 19 Jeffrey's best friends.</p> <p>20 Q. Who is that?</p> <p>21 A. I believe --</p> <p>22 Q. Who is Jeffrey's best friend that she 23 was going out with?</p> <p>24 A. I don't know. I don't know. [REDACTED] 25 something like that, is her name.</p>	<p style="text-align: right;">20</p> <p>1 A. I heard that. I heard that. I don't 2 know, because I never met -- I never -- I was 3 never, like, around him or nothing like that. I'm 4 just telling you what I heard. But regarding 5 Jean-Luc, I know -- I know he has that kind of 6 problem, no?</p> <p>7 Q. And as long as you knew Jean-Luc, he 8 always had a cocaine problem?</p> <p>9 A. Yes.</p> <p>10 Q. What about Jeff Fuller?</p> <p>11 A. I know he had a cocaine problem, too. 12 He was one time on the Internet, you know, like, a 13 report on that.</p> <p>14 Q. And is Jeff Fuller somebody else who you 15 also knew to have been associated sexually with 16 underage girls?</p> <p>17 A. Jeff, I -- you know, I don't think Jeff. 18 I always thought Jeff was gay. For me, he's gay. 19 You know, that's the impression that I have. But 20 I don't think so.</p> <p>21 Q. Did you find out that Jeffrey Epstein 22 and/or Jean-Luc Brunel were involved in these 23 underage girls that were staying in these 24 apartments at 301 East 66th Street?</p> <p>25 A. I really don't know that. You know, I</p>
<p style="text-align: right;">19</p> <p>1 Q. All right. What information do you have 2 about Jean-Luc being involved with underage girls 3 at any point in time? And by that I mean being 4 involved sexually with underage girls.</p> <p>5 A. One day he told me that he wishes he can 6 sleep with one of those girls that was underage. 7 And I told him that's a minor, whatever. And 8 then -- hold on, that's my son. 9 (Telephone interruption.)</p> <p>10 A. He had a problem, you know. I cannot 11 say I saw them, look, because I would be lying. 12 And I'm not going to say any lie. But the only 13 thing that I can tell you that what I saw about 14 Jean-Luc is that Jean-Luc is a drug addict, a 15 cocaine addict.</p> <p>16 Q. At some point in time you actually saw 17 evidence of that, right?</p> <p>18 A. Yes.</p> <p>19 Q. I mean, him using cocaine that somebody 20 does every day?</p> <p>21 A. Yeah. He's an addict. He's used to 22 drugs, as well as, you know -- I know Mr. Epstein 23 doesn't take any alcohol, drugs. I know that. I 24 heard that.</p> <p>25 Q. How do you know?</p>	<p style="text-align: right;">21</p> <p>1 cannot tell you. I know there were girls staying 2 there. I never knew if they were going there or 3 not.</p> <p>4 Q. You mean, you knew that the girls were 5 staying there; 13, 14, 15?</p> <p>6 A. Some of the girls were underage, yeah.</p> <p>7 Q. As well as 13, 14 or so?</p> <p>8 A. Thirteen or 14, yeah.</p> <p>9 Q. Did you ever ask any of the girls if 10 they were sexually involved with Jean-Luc and/or 11 Jeffrey Epstein?</p> <p>12 A. No. One time there was a problem with 13 [REDACTED] And she was -- I believe she was 14 14 years old. And she tried to go -- or they took 15 her to a discotheque in Miami Beach. And when I 16 went to work the day after, they told me that the 17 police was asking. So since she was doing 18 whatever she wanted, you know, I brought her to my 19 house and I said, you're not going out at night; 20 you're only 13, 14, and that's my responsibility.</p> <p>21 Q. Do you know Sergio Cordero?</p> <p>22 A. Yes.</p> <p>23 Q. And do you know what Sergio's role was 24 in getting girls or something for Jeffrey Epstein?</p> <p>25 A. Yeah. That -- that is something that</p>

6 (Pages 18 to 21)

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<p style="text-align: right;">22</p> <p>1 Sergio, you know, comment with me. And he said 2 that when Jeffrey Epstein went to Ecuador, 3 Jean-Luc told me that he has to bring girls and 4 this and that, because Jeffrey was coming to 5 Ecuador. So they did such a big thing. 6 Q. Right. But in terms of bringing girls, 7 specifically girls, that were very young? 8 A. Yeah, but there was girls from Ecuador. 9 There is nothing you can do there. It's South 10 America. 11 Q. I understand that. I'm not saying 12 whether it was legal or illegal. I'm just asking 13 you, the direction was that Jean-Luc told 14 Sergio -- 15 A. Not to bring girls. Never said -- 16 never -- Sergio knew that they like young girls. 17 Q. By young, what are we talking about? 18 A. Eighteen, 19. Sergio -- you know, I 19 know Sergio. And more than anything, like, Sergio 20 is a father. And I don't think he will put his 21 hands on a ten, 11, 12, 13-year-old girl. You 22 know what I mean? 23 Q. I'm not asking about him. Do you know 24 of Jeffrey Epstein being involved with underage 25 girls?</p>	<p style="text-align: right;">24</p> <p>1 with [REDACTED], and we knew [REDACTED] was 2 only 18 years old. She is a young girl. So 3 that's the kind of girl he likes. You know what I 4 mean? 5 Q. But there is nothing illegal going out 6 with an 18-year-old girl. And that's what I'm 7 asking. 8 A. No. 9 Q. What information do we have that Jeffrey 10 Epstein was involved with underage girls? I mean, 11 I have a lot of information of my own. But I'm 12 asking what information do you know. 13 A. The only thing I heard in the office, 14 that Jean-Luc say it, that they like -- when they 15 say, oh, I wish I could sleep with this girl or 16 the fact that he was taking 15, 16-year-old girls 17 to his house. 18 Q. Who? 19 A. I know that because I saw him. 20 Q. Jean-Luc was taking 15-year-old girls to 21 his own place? 22 A. No, to Jeffrey's house. 23 Q. To Jeffrey's house? 24 A. Yes. 25 Q. And what 15-year-old girls was he taking</p>
<p style="text-align: right;">23</p> <p>1 A. I heard that, yeah. 2 Q. You heard that through whom? I don't 3 mean just the newspapers and things like that. I 4 mean -- 5 A. No. Through -- through the office. 6 Through Jean-Luc. Through -- there were 7 conversations of Jean-Luc saying that, you know. 8 Q. Saying what? 9 A. That Jeffrey likes underage girls. And 10 never directly but, you know, his conversations 11 were like that. 12 Q. Okay. But, specifically, I just want to 13 know what evidence that we have, what real 14 conversations that you heard, about Jeffrey 15 Epstein liking underage girls. 16 A. I'm telling you Jean-Luc saying it from 17 his mouth. 18 Q. Okay. And, specifically, he says 19 Jeffrey Epstein likes underage girls or he likes 20 12-year-olds or likes what? 21 A. No, he likes young girls. When they 22 were talking in the office, there were a lot of 23 people. So they were not stupid. They were 24 knowing how to talk. Because they were making, 25 like, a big thing of, oh, look, he's going out</p>	<p style="text-align: right;">25</p> <p>1 to Jeffrey's house? 2 A. At the time I'm telling you it was [REDACTED] 3 [REDACTED] I don't know remember the other two 4 girls. There is two Brazilian girls. I gave it 5 to you before, the names. I don't remember right 6 now. 7 Q. Do you know Leslie Groff? 8 A. No. 9 Q. Do you know Khalid Mohammed? 10 A. Yes. 11 Q. What did he do? 12 A. He was a scouter and a booker. 13 Q. Scouter; what does that mean? 14 A. Person looking for models. 15 Q. And how legitimate was -- 16 A. Khalid Salaam. 17 Q. Salaam? 18 A. Yeah. 19 Q. Right. Where was he bringing models in 20 from or looking for models? Outside the country 21 or -- 22 A. Inside the country. Very -- not often 23 from outside the country, no, no. From inside. 24 Q. Did you ever hear of any of the parties 25 that took place on Jeffrey Epstein's island?</p>

7 (Pages 22 to 25)

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26	<p>1 A. In --</p> <p>2 Q. Little St. James?</p> <p>3 A. One New Year's, I believe -- that was,</p> <p>4 like, 2004, 2005, that New Year's -- they were</p> <p>5 having a party there.</p> <p>6 Q. Who was having a party there?</p> <p>7 A. Mr. Epstein.</p> <p>8 Q. And who was at the party that you know?</p> <p>9 A. I know Jean-Luc was there. But then --</p> <p>10 specifically, I don't know if Jean-Luc stay there,</p> <p>11 because what I do recall is that, during those</p> <p>12 days, there was, like, December 30 or 29,</p> <p>13 something like that, Jean-Luc call me from Puerto</p> <p>14 Rico that he was doing the scouting and he --</p> <p>15 actually, he was the one who told me that he had</p> <p>16 to go to Jeffrey's island because they were having</p> <p>17 the party there for New Year's.</p> <p>18 Q. What other girls do you know of that</p> <p>19 were at that party?</p> <p>20 A. I don't know.</p> <p>21 Q. Do you know of any of the other people</p> <p>22 that were at that party?</p> <p>23 A. No.</p> <p>24 Q. Just Jean-Luc and Epstein?</p> <p>25 A. Yes.</p>	28	<p>1 Q. What did he accuse you of?</p> <p>2 A. Of stealing money. And I had a letter</p> <p>3 from Jean-Luc authorizing me to get the money that</p> <p>4 I had, you know.</p> <p>5 Q. And did you ultimately have to plead to</p> <p>6 criminal charges because of that?</p> <p>7 A. That was my -- what my attorney told me.</p> <p>8 Q. Yeah?</p> <p>9 A. Yeah.</p> <p>10 Q. So now you're on probation or something?</p> <p>11 A. Yes.</p> <p>12 Q. How long does the probation last?</p> <p>13 A. They did it for 20 years. So I'm just</p> <p>14 trying to reduce that.</p> <p>15 Q. Twenty-year probation?</p> <p>16 A. Yeah.</p> <p>17 Q. And other than Jeff Fuller, who else</p> <p>18 was -- who else was making these accusations?</p> <p>19 A. Only Jeff.</p> <p>20 Q. How about Jean-Luc?</p> <p>21 A. I never -- my attorney told me that</p> <p>22 Jean-Luc was never interviewed, nothing.</p> <p>23 Q. Jeffrey Epstein?</p> <p>24 A. No.</p> <p>25 Q. Have you talked to Jean-Luc about the</p>
27	<p>1 Q. The last time that we talked, I have</p> <p>2 just the investigative report, which basically was</p> <p>3 just typed up from the things that you said. It</p> <p>4 was written that Ms. Vasquez advised that she,</p> <p>5 herself, submitted the documents to renew [REDACTED]</p> <p>6 foreign visa on at least two occasions.</p> <p>7 A. No, not me. It was Evelyn Valenzeula.</p> <p>8 I never did her visa. That visa was done by</p> <p>9 Evelyn in New York.</p> <p>10 Q. When is the first time that you learned</p> <p>11 that [REDACTED] was involved with Jeffrey</p> <p>12 Epstein?</p> <p>13 A. I believe in 2007. After I was out of</p> <p>14 the company.</p> <p>15 Q. You didn't know, when you were in the</p> <p>16 company, that they were involved?</p> <p>17 A. No.</p> <p>18 Q. All right. At some point in time, did</p> <p>19 you get in trouble, criminal trouble, related to</p> <p>20 MC Squared?</p> <p>21 A. They accuse me in 2006.</p> <p>22 Q. Who accused you?</p> <p>23 A. Jeff.</p> <p>24 Q. Jeff Fuller?</p> <p>25 A. Yes.</p>	29	<p>1 whole situation?</p> <p>2 A. I spoke with Jean-Luc on two or three</p> <p>3 times. I spoke with Jean-Luc, like, two or three</p> <p>4 times during -- prior to the middle of the</p> <p>5 process, I did -- and I still have an e-mail that</p> <p>6 he send me because he wanted to talk to me, I</p> <p>7 wanted to talk to him. And I never made the time</p> <p>8 because Jeff Fuller didn't allow him to talk to</p> <p>9 me. So we never got to get together to talk.</p> <p>10 Q. And they prosecuted the case in Federal</p> <p>11 Court here in Miami?</p> <p>12 A. Yes.</p> <p>13 Q. And your entire sentence was probation;</p> <p>14 there was no prison or house arrest?</p> <p>15 A. House arrest one year. That, it was</p> <p>16 done already. And then probation.</p> <p>17 Q. The last time, I have a lot of other</p> <p>18 notes about some of the models that were being</p> <p>19 brought in and signing visas, as if they were</p> <p>20 going to work here, but really they were living in</p> <p>21 the apartment and didn't really do any modeling</p> <p>22 work.</p> <p>23 A. Yeah, that is true. That is true. I</p> <p>24 told you that. Many, many girls were coming here.</p> <p>25 Many girls were coming here first without a visa,</p>

8 (Pages 26 to 29)

30

1 without a working visa. Most of the girls, they
 2 were coming in to the States as tourists. They
 3 were working -- whenever they work, they were
 4 collecting 30 percent from their income when they
 5 were not even legal. They didn't even have a
 6 Social Security or nothing but they never pay it.
 7 Neither to the government, neither to the girls,
 8 you know. And within the time, I believe Jean-Luc
 9 start getting pressure from Mr. Epstein that he
 10 didn't want to get in trouble and he put some
 11 pressure on Jean-Luc. So he wanted all the girls
 12 to have a visa. So they start working on the
 13 visas of the girls.

14 **Q. Okay.**

15 **A.** And they were making, like, contracts or
 16 things like that. Because, prior to that, they
 17 didn't have it. Prior to that, when Jean-Luc --
 18 prior to Jean-Luc getting the money from
 19 Mr. Epstein, Jean-Luc was doing whatever he
 20 wanted.

21 **Q. Okay.**

22 **A.** And later, you know, Mr. Epstein put the
 23 money that he had to start taking, you know, all
 24 the invoices from Mr. Epstein.

25 **Q. Does Jeffrey Epstein know that Jean-Luc**

31

1 **is a coke addict?**

2 **A.** I don't know. I don't even know that
 3 Mr. Epstein knows that Jean-Luc lied to him all
 4 the time. Because when he -- when I gave the Line
 5 of Credit to Jean-Luc, Jean-Luc presented false
 6 statements to him. You know, Mr. Epstein wanted
 7 to see that the company was a profitable company
 8 and we had to hide all those numbers. And we had
 9 to give him, like, positive numbers so he can see
 10 that the company was making money but in belief
 11 always was in red.

12 **Q. What do you mean by that? Jeffrey**
 13 **Epstein said, hey, I'm going to give you money as**
 14 **long as the company is positive?**

15 **A.** Yeah. Mr. Epstein wanted to see -- I
 16 believe -- I believe, since he's a very successful
 17 person moneywise, he was not stupid to put his
 18 money, even though he knew he was able to get
 19 girls or whatever, you know, if that was the case.
 20 But deep inside he wanted to see if these people
 21 really -- if this company was profitable for him
 22 to put a million dollars.

23 **So maybe Eric Gany, at the time, was one**
 24 **of his advisors. And they wanted to see the**
 25 **profit and loss statements and, you know, the**

32

1 balance book or whatever.

2 **I told you the name of the accountant**
 3 **that you could go and took all those papers, you**
 4 **know, make a subpoena or whatever, of Richard**
 5 **Fernandez, that he could give you all the**
 6 **information, 1998, '99, 2000, after 2005, that he**
 7 **did everything and you could see the company was**
 8 **always in red, always.**

9 **Q. So the company wasn't profitable but**
 10 **Jean-Luc falsified documents to show to Jeffrey**
 11 **Epstein?**

12 **A. Yes.**

13 **Q. And have you seen the real documents and**
 14 **the falsified documents?**

15 **A. Yes.**

16 **Q. So you know that they were falsified?**

17 **A. Yes.**

18 **Q. Is it your understanding that Jeffrey**
 19 **Epstein is still involved, from a financial**
 20 **aspect, in MC Squared?**

21 **A.** I believe so. Because, as far as I
 22 know, the Line of Credit wasn't paid. The million
 23 dollars wasn't paid.

24 **Q. And Jean-Luc and Jeffrey Epstein are**
 25 **still friends?**

33

1 **A. Yes. Jean-Luc is still living in**
 2 **Jeffrey Epstein's apartment in New York.**

3 **Q. How do you know that?**

4 **A.** Well, because -- because I know.

5 **Q. From Evelyn?**

6 **A. Yes.**

7 **Q. Is Evelyn still working for MC Squared?**

8 **A. No.**

9 **Q. Do you know who is working for MC**
 10 **Squared?**

11 **A.** It was working until not too long ago a
 12 very -- Evelyn's goddaughter, Jobelin, she was
 13 working there.

14 **Q. How do you spell it?**

15 **A. J-O-B-E-L-I-N.**

16 **Q. Okay. Anybody else?**

17 **A. In Europe?**

18 **Q. Yes, or here.**

19 **A. No, that was related to Eve? No,**
 20 **Evelyn -- Jobelin.**

21 **Q. Who works in the MC Squared office here?**

22 **A.** Here, I knew other things, because
 23 Amanda Grant and -- I gave you her name more than
 24 one time. Amanda was working with them until
 25 2008. And she got a lot of information. And she

<p style="text-align: right;">34</p> <p>1 wanted -- you know, she call -- I arrange she call 2 Immigration, because they screw her. And, 3 actually, they made her leave the company because 4 she has -- she is a single mother, four kids. And 5 they were giving her a lot of bad -- bad time. 6 (Telephone interruption.) 7 Q. How do you spell her name, Amanda Grand, 8 G-R-A-N-D? 9 A. N-Y. Amanda Grant. 10 Q. And do you know her address, phone 11 number; something like that? 12 A. I have -- you can get it in Facebook. 13 She's in Facebook. Amanda Grant. 14 Q. Do you have it? 15 A. Not in this phone. My other phone broke 16 so I don't. I can get it for you, if you want. 17 Q. Yeah, I would appreciate it. 18 A. Yeah. 19 Amanda had also the information of 20 monies, as I told you before, that took monies 21 that they were transferred to the British Virgin 22 Islands. 23 Q. Monies transferred to the British Virgin 24 Islands? 25 A. Yes.</p>	<p style="text-align: right;">36</p> <p>1 A. Yeah, sometimes -- and that's -- that's 2 what I can tell you. I know because -- I can tell 3 you about Jean-Luc, that I know because I met him 4 for ten years. Okay? I can put my hands on fire 5 and I can tell you that he did it. About Jean-Luc 6 I can say it. I don't know about Mr. Epstein 7 because I was never -- I met him once in my life. 8 I saw him once in my life. And after that, when I 9 saw him, was in the newspapers; that's it. 10 Q. And, otherwise, you just heard that 11 Jeffrey Epstein likes underage girls? 12 A. Underage girls, yeah. 13 Q. And there was a time where Sergio -- 14 well, I've talked to Sergio, so I'll talk to him 15 about whatever the Ecuador trip was. 16 A. Yes. 17 Q. All right. Do you know of this company, 18 COUQ -- 19 A. No. 20 Q. -- Foundation. All right. Do you know 21 of somebody by the name of Gypsy, G-Y-P-S-Y? 22 A. No. 23 Q. Somebody who provided Jeffrey Epstein 24 girls? 25 A. No.</p>
<p style="text-align: right;">35</p> <p>1 Q. From what account to what? 2 A. Jean-Luc opened an account there because 3 Jeffrey told him that it was better to open an 4 account there. So there was money -- like, for 5 example, if the monies were going to Manuel Cruz 6 to do a shoot or something, Jean-Luc was 7 negotiating with the girls and say, okay, if you 8 go to do the sunny photos, I give you \$2,000 cash, 9 no reports, whatever. 10 So Jean-Luc had -- as billing that 11 company from another company, or from the British 12 Virgin Islands. So he was neither paying taxes 13 here and maybe he was making \$20,000 on that 14 shooting and he was giving the girl only \$2,000 15 and that money never came to be reported here. 16 Q. Okay. Other than you saying that you 17 know that a 15-year-old or so went to Jean-Luc's 18 house with him, how else do we know that Jean-Luc 19 and/or Jeffrey Epstein, I'm more concerned with 20 Jeffrey Epstein, were involved sexually with 21 underage girls? 22 A. How do I know? I -- I -- I cannot tell 23 you that I saw -- that I was there because that's 24 not true. I never saw anything. 25 Q. Right. But sometimes you just know?</p>	<p style="text-align: right;">37</p> <p>1 Q. How about Jileta (phonetic)? 2 A. No. 3 Q. Never heard that name? 4 A. No. 5 Q. [REDACTED] 6 A. I believe I heard that name. But I -- 7 Q. She works up in New York and I believe 8 she works for Jeffrey Epstein in some capacity. 9 Do you know what that is? 10 A. I believe so. No. 11 Q. Okay. 12 A. The person who can tell you that is Eve. 13 Because Eve was very involved with Jeffrey 14 Epstein's office. 15 Q. What is Eve's number again? 16 A. [REDACTED] 17 Q. Do you know Jojo Fontanella? 18 A. No. 19 Q. No? Other than Jean-Luc, what other 20 people that are friends with Jean-Luc share this 21 interest in underage girls, that you know of? 22 A. No. 23 Q. I mean, who are his friends? Who are 24 the guys he hangs out with? 25 A. Jeff. When he was in Miami, Jeff,</p>

10 (Pages 34 to 37)

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<p style="text-align: right;">38</p> <p>1 Corrado.</p> <p>2 Q. Who is Corrado?</p> <p>3 A. A friend of Jean-Luc. An Italian guy.</p> <p>4 They were always like that, Corrado and Luc. I</p> <p>5 met Jean-Luc's friends in Ecuador, like people</p> <p>6 that had to be -- people that they were involved</p> <p>7 with modeling agencies in Europe, in South</p> <p>8 America, but very different people, very different</p> <p>9 people. I met some people from France. Pero,</p> <p>10 really, even if they were guys or whatever,</p> <p>11 gentlemen. You know, like, very proper people.</p> <p>12 Like, from Brazil, too. And the womans, you know.</p> <p>13 Q. How about Simon Parra; you know who that</p> <p>14 is?</p> <p>15 A. Simon Parra, yeah.</p> <p>16 Q. How do you know him?</p> <p>17 A. I met him through Jean-Luc.</p> <p>18 Q. And what's his story?</p> <p>19 A. Mr. Parra was a very good friend of the</p> <p>20 office. I cannot say of Jean-Luc because he was</p> <p>21 only a friend of him. He was a very good friend</p> <p>22 of the office, because Mr. Parra is a gentleman.</p> <p>23 He was lending money to the office. Whenever I</p> <p>24 requested, he always gave it to me for the office.</p> <p>25 You know, that I signed -- I had to sign papers</p>	<p style="text-align: right;">40</p> <p>1 A. Yes.</p> <p>2 Q. And they come in the country and they</p> <p>3 don't have their parents?</p> <p>4 A. Yes.</p> <p>5 Q. So they don't really have any parental</p> <p>6 supervision while they're here?</p> <p>7 A. Not at all.</p> <p>8 Q. So the modeling industry is one that</p> <p>9 some guys use that to get underage girls and</p> <p>10 that's happened for a long time, really, right?</p> <p>11 A. Yes.</p> <p>12 Q. So is that what Jean-Luc Brunel still</p> <p>13 does?</p> <p>14 A. Yes.</p> <p>15 Q. Still uses it to get underage girls to</p> <p>16 sleep with, really, right?</p> <p>17 A. Yes.</p> <p>18 Q. And Jeffrey Epstein, too?</p> <p>19 A. I cannot tell you that because I don't</p> <p>20 know. I know if there is -- there is kind of a</p> <p>21 relationship, I believe they will or he will. You</p> <p>22 know, he still does it. But I don't know. I</p> <p>23 cannot tell you because I was never -- I was</p> <p>24 never -- what I can say that I know, because I was</p> <p>25 with that person for the longest, was with</p>
<p style="text-align: right;">39</p> <p>1 for him or whatever, to -- to do the payrolls or</p> <p>2 whatever. But Mr. Parra is a guy that he likes to</p> <p>3 be surrounded by girls. But not underage girls.</p> <p>4 Q. Okay. What was Jeffrey Epstein getting</p> <p>5 out of MC Squared?</p> <p>6 A. The only thing that I can think he was</p> <p>7 getting was the girls. Nothing else. Because he</p> <p>8 has all the money.</p> <p>9 Q. And the company wasn't making money</p> <p>10 anyway?</p> <p>11 A. No.</p> <p>12 Q. And you know the company wasn't making</p> <p>13 money?</p> <p>14 A. It wasn't at all. At all. So the only</p> <p>15 thing that he was -- I believe that he wanted to</p> <p>16 get involved was because of the girls, that's it.</p> <p>17 Pero, he wanted to do it legally, like, girls</p> <p>18 coming here, even if they were underage or</p> <p>19 whatever, with visas.</p> <p>20 Q. Because the modeling industry is one of</p> <p>21 those industries where there is a lot of girls</p> <p>22 underage coming in the country, right?</p> <p>23 A. Yes.</p> <p>24 Q. That's pretty easy access to underage</p> <p>25 girls?</p>	<p style="text-align: right;">41</p> <p>1 Jean-Luc. The same thing that I can tell you,</p> <p>2 that even if he has a daughter, whatever, I put my</p> <p>3 hands on fire that Jeff Fuller is gay.</p> <p>4 Q. Okay. And Jean-Luc, you saw him use</p> <p>5 cocaine at work?</p> <p>6 A. Not in the office. But sometimes he was</p> <p>7 coming to the office, like, with blood coming from</p> <p>8 the nose and white things here, that he had to go,</p> <p>9 oh, you go and clean yourself or whatever, you</p> <p>10 know.</p> <p>11 Q. Would he talk about his cocaine</p> <p>12 addiction?</p> <p>13 A. Not directly, but it was a box properly,</p> <p>14 everyone knew about that. And he was the one --</p> <p>15 the kind of person who didn't feel ashamed to</p> <p>16 tell. For example, Sergio was there and I was</p> <p>17 here and he was there and he was, like, Sergio, go</p> <p>18 and get me the best one, you know. And Sergio was</p> <p>19 going and getting it for him.</p> <p>20 Q. So he didn't really hide the fact that</p> <p>21 he used cocaine?</p> <p>22 A. No. No. But not in the office, not in</p> <p>23 front of the bookers.</p> <p>24 Q. Where is the office in New York?</p> <p>25 A. Six West 14th Street.</p>

42	<p>1 Q. And do you know what Khalid is doing 2 now? 3 A. No. 4 Q. Is he in Miami? 5 A. Yes, he's in Miami. 6 Q. Do you know his number? 7 A. No, I don't know his number. 8 Q. How about Mike Sanka? 9 A. Michael Sanka, he's in California. 10 Q. What did he do? 11 A. He represents -- he represents artists, 12 players. He is, like, a manager. 13 Q. Did he have any role in procuring 14 underage girls for anybody? 15 A. Never. No. Not at all. 16 Q. How about Arnaud Brunel? 17 A. He's Jean-Luc's brother. 18 Q. Is he here in Miami? 19 A. No. 20 Q. Where is he? 21 A. France. 22 Q. Has he ever been here in Miami? 23 A. Yes. 24 Q. When is the last time you talked to him? 25 Been a while?</p>	44	<p>1 A. Ruth, the other lady in Paris. It's the 2 same thing. She will tell you everything. 3 Jean-Luc came from Paris -- 4 Q. How do you spell her name? 5 A. I don't know her name. Her last name I 6 don't know. Her name is Ruth. R-U-T-H. Like, he 7 came from Paris. Because if he stay in Paris, he 8 had to pay taxes and this and that. Everything 9 that he was avoiding. 10 Q. Who, Jean-Luc? 11 A. Jean-Luc. 12 Q. Do you know how he and Jeffrey Epstein 13 became friends? 14 A. No. 15 Q. Or why they became friends? 16 A. No. 17 Q. I mean, other than underage girls, what 18 else do those two have in common? 19 A. That's the only thing, I believe. And 20 it's very -- you know, like, I saw Mr. Epstein 21 once in a gym, in a church, very simple. And you 22 see Jean-Luc on the same place and you see 23 Jean-Luc with a -- Prada pants and with a Gucci 24 T-shirt and with Dolce Cabana sunglasses. It's 25 like two different characters.</p>
43	<p>1 A. 2006. No, 2003. 2 Q. Okay. Is he close with Jean-Luc? 3 A. No. Well, he's his brother, you know. 4 Q. Yeah. 5 A. There is a blood relation there. But I 6 can tell you it's, like, oil and water, two 7 different persons. Two different heads. Two 8 different mentalities. 9 Q. Who are the people -- 10 A. A gentleman and a beast. Mr. Arnaud 11 Brunel is a gentleman, a very correct person, very 12 transparent. The other is the opposite. 13 Q. Do you know this guy, Etienne? 14 A. Etienne Rau. He was another partner of 15 Jean-Luc, in Karin's. Another gentleman, another 16 real good person. Actually, Jean-Luc screw him 17 and he took him out from Karin's. He closed 18 Karin's here in Miami, without Mr. Etienne's 19 knowledge. 20 Q. And if we talk to Etienne, he would not 21 have nice things to say about Jean-Luc? 22 A. No. Not at all. 23 Q. What about -- 24 A. Ruth. 25 Q. Who is that?</p>	45	<p>1 Q. And how many girls, at any one time, 2 would MC Squared have under them? 3 A. A lot. Like, over 200, 300. 4 Q. Other than the one time where four girls 5 were taken to Jeffrey Epstein's house -- and all 6 four of those girls were underage at the time, 7 right? 8 A. Yes. 9 Q. They were 14 or 15 at the time? 10 A. Yeah, 15, 16, 14; something like that. 11 Q. Other than that time, what other 12 occasion -- jog your memory, think this through -- 13 have you known of Jeffrey Epstein to be in the 14 same vicinity as any of the models? Was there 15 ever a time that Jean-Luc says, hey, Jeffrey 16 Epstein is coming up to New York this weekend, 17 we're going to hang out at the apartment or 18 Jeffrey Epstein is this? 19 A. No. Never. Jean-Luc never mentioned 20 his name until 2003, when, actually, Mr. Epstein 21 got involved. To me, you know, to me. Prior to 22 that, one more time, you can talk to Eve. She 23 knew Jeffrey Epstein prior -- prior to me. 24 Q. Before you did? 25 A. Yes.</p>

12 (Pages 42 to 45)

46

1 Q. And she has seen him more often than you
 2 have?
 3 A. Of course, because she was in New York
 4 all the time. She live in New York and I never
 5 live there. I was, like, commuting one week in
 6 New York, two weeks in Miami. One week in New
 7 York, two weeks in Miami.
 8 Q. Are you leaving to go to Colombia soon?
 9 A. To Peru.
 10 Q. To Peru?
 11 A. Yeah.
 12 Q. When?
 13 A. The 24th.
 14 Q. And do you know when you're going to be
 15 back?
 16 A. The 28th.
 17 Q. All right. Like I said, I would hope
 18 and think that this whole thing -- that your
 19 involvement is completely done. However, there is
 20 one case that Jeffrey Epstein has not settled
 21 right now that could go to trial. If it went to
 22 trial, then we could be called at trial. But it's
 23 highly unlikely that is going to happen. I'm just
 24 letting you know there is a possibility.
 25 Emmy Taylor, do you know who that is?

47

1 A. No.
 2 Q. [REDACTED]
 3 A. No.
 4 Q. Joelle Pashcow?
 5 A. No.
 6 Q. Lynn Fontanella?
 7 A. No.
 8 Q. [REDACTED]
 9 A. No.
 10 [REDACTED]
 11 [REDACTED] -- I didn't mention
 12 her because I didn't remember her name. Now you
 13 say it, [REDACTED] was a girl who was working for
 14 Karin's. She was not underage but she was a young
 15 girl. She was working for Karin's. She was
 16 studying and she was living at Jeffrey Epstein's
 17 apartment. She was living at his place.
 18 Q. And what was her involvement with
 19 Jean-Luc and/or Jeffrey Epstein?
 20 A. She was working at Karin's.
 21 Q. Okay. As a model?
 22 A. No. She was a -- an employee.
 23 Q. She traveled on his airplane with him a
 24 lot?
 25 A. Yeah, because she's a personal friend of

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1 Jeffrey. She was living in his place.
 2 Q. Anything else about him that --
 3 A. No.
 4 Q. Or about her?
 5 A. No.
 6 Q. Inka Dury?
 7 A. No.
 8 Q. Any other people that you know that were
 9 living in that apartment at any time?
 10 A. No.
 11 Q. Other than the people that you named
 12 already, which are now [REDACTED]
 13 [REDACTED]
 14 A. I don't think Elena lived there. Elena
 15 was living in one of the models' apartment that we
 16 rent. Because besides those two apartments, we
 17 rent apartments in New York for the girls.
 18 Q. Who decides whether the girls live in --
 19 A. Jean-Luc.
 20 Q. Jean-Luc decides whether the girls live
 21 at 301 that's owned by Jeffrey Epstein or the
 22 other apartments that are rented by MC Squared?
 23 A. Yeah.
 24 Q. And how does he make that determination?
 25 A. He's the owner.

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1 Q. Oh, but, I mean, what are the
 2 qualifications? I mean, if he likes the girl or
 3 they're underage or they're --
 4 A. No, if there were, like, good girls,
 5 girls that they could make money, they were living
 6 in an expensive place. If they were, like,
 7 regular girls, they were living in shitty places.
 8 Q. Okay. But which one is Jeffrey
 9 Epstein's place?
 10 A. An expensive place.
 11 Q. Okay. So the better models were living
 12 there?
 13 A. Ycs.
 14 Q. [REDACTED] do you know who that
 15 is?
 16 A. No.
 17 Q. Did you ever meet with Naomi Campbell?
 18 A. No.
 19 Q. Did you know that she was friends with
 20 Jeffrey Epstein?
 21 A. No.
 22 Q. Did you ever meet Leslie Wexner?
 23 A. That's the woman that was involved with
 24 Mr. Epstein, no?
 25 Q. No. Leslie Wexner is the owner of

<p style="text-align: right;">50</p> <p>1 Victoria's Secret?</p> <p>2 A. No. No. He was a writer.</p> <p>3 Q. No. He's the owner of Victoria's</p> <p>4 Secret, The Limited, Abercrombie.</p> <p>5 A. No. No.</p> <p>6 Q. Did you ever hear anything about Jeffrey</p> <p>7 Epstein's relationships, who he was with: Male,</p> <p>8 female, a person's name?</p> <p>9 A. I know, because Eve told me that he had</p> <p>10 a relationship with a woman that her father was</p> <p>11 very wealthy and that's how he started his own</p> <p>12 money. And if you tell me the name, maybe I can</p> <p>13 remember. But I don't --</p> <p>14 Q. Ghislaine Maxwell?</p> <p>15 A. Yes.</p> <p>16 Q. And her father was Robert Maxwell?</p> <p>17 A. Yes.</p> <p>18 Q. Other than that relationship, are you</p> <p>19 aware of any other relationships of Jeffrey</p> <p>20 Epstein?</p> <p>21 A. No.</p> <p>22 Q. How many times are you aware of Jean-Luc</p> <p>23 bringing underage girls to Jeffrey Epstein's home</p> <p>24 in Palm Beach?</p> <p>25 A. While I was there, when I was working</p>	<p style="text-align: right;">52</p> <p>1 A. Not really. Not really. Not really</p> <p>2 that -- because I would never think that they were</p> <p>3 going to a party. And I didn't know Mr. Epstein</p> <p>4 in that scenario, you know. I know Jean-Luc was</p> <p>5 crazy or is crazy, but not stupid to be with those</p> <p>6 particular girls, because these girls were coming</p> <p>7 from a very good friend of him in Brazil.</p> <p>8 Q. Who is that?</p> <p>9 A. And he didn't -- I don't remember her</p> <p>10 name. The mother agent of these four girls. I</p> <p>11 gave it to you before. I don't remember her name.</p> <p>12 It's a black woman.</p> <p>13 Q. It's not Cache?</p> <p>14 A. No. What's her name?</p> <p>15 Q. Because I have that part of the report</p> <p>16 right here, stating that Brunel had a connection</p> <p>17 with a young Brazilian woman but I don't have a</p> <p>18 name for that person.</p> <p>19 A. No. He was having a connection with a</p> <p>20 woman in Brazil that she was giving him</p> <p>21 prostitutes when he needed it.</p> <p>22 Q. The connection woman in Brazil was</p> <p>23 giving Jean-Luc prostitutes?</p> <p>24 A. Real prostitutes when he needed it.</p> <p>25 Q. How old were these prostitutes?</p>
<p style="text-align: right;">51</p> <p>1 with them, maybe -- maybe two, three times a year.</p> <p>2 The last year; you know, 2003, 2004, 2005.</p> <p>3 Q. And how would you know --</p> <p>4 A. Not prior to that.</p> <p>5 Q. How would you know that Jean-Luc was</p> <p>6 taking underage girls to Jeffrey Epstein's house</p> <p>7 during those years?</p> <p>8 A. Because he was saying in the office:</p> <p>9 There is a party at Jeffrey's house; I'm taking</p> <p>10 the girls. And the girls, that they were in town,</p> <p>11 they were, like, underage girls.</p> <p>12 Q. We are still talking about 14, 15?</p> <p>13 A. Sixteen, yeah.</p> <p>14 Q. Sixteen, at the oldest?</p> <p>15 A. Yes. And they were going, the other</p> <p>16 girls, too, but he -- he personally was taking the</p> <p>17 little ones. Because the other ones, they could</p> <p>18 go in their own cars or whatever, you know, with</p> <p>19 their boyfriends.</p> <p>20 Q. Did you ever say anything to him about</p> <p>21 taking underage girls to Jeffrey Epstein's house?</p> <p>22 A. You know, as a mother I always told him</p> <p>23 that they were underage girls. And he was saying,</p> <p>24 oh, that I'm the father.</p> <p>25 Q. But you knew what was going on?</p>	<p style="text-align: right;">53</p> <p>1 A. I don't know. I don't know because I</p> <p>2 was never in Brazil with him or nothing like that.</p> <p>3 Q. In Brazil?</p> <p>4 A. In Brazil. That was in Brazil.</p> <p>5 Q. Was Jeffrey Epstein involved in these --</p> <p>6 A. Jeffrey Epstein was going to Brazil</p> <p>7 because he has one or two clients that they're</p> <p>8 from there. So they were going, they were meeting</p> <p>9 there and everything like that.</p> <p>10 Q. So you know of at least occasions where</p> <p>11 Jeffrey Epstein and Jean-Luc were in Brazil --</p> <p>12 A. Yes.</p> <p>13 Q. -- and there was a particular person</p> <p>14 that would provide prostitutes for them?</p> <p>15 A. Yeah, because one time I know because</p> <p>16 Jean-Luc say it to me openly.</p> <p>17 Q. What did he say?</p> <p>18 A. That that woman was giving him, not</p> <p>19 models; they were prostitutes.</p> <p>20 Q. In my notes it says underage</p> <p>21 prostitutes. Is that something that --</p> <p>22 A. Yeah, maybe. They were underage girls.</p> <p>23 Like, 16, 17, 18.</p> <p>24 Q. Ms. Vasquez stated, tell me if you agree</p> <p>25 with this, that Brunel would have her prepare a</p>

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<p style="text-align: right;">54</p> <p>1 list on a weekly basis that covered changing out 2 or replacing the girls staying in Epstein's 3 apartment and providing them with living expenses, 4 as well. And then it goes on, saying that he 5 charged them rent? 6 A. Yeah, yeah. He was the one who said who 7 stays in what apartment and -- actually, what he 8 said is, like, A, B, C, stays in Jeffrey's 9 apartment. So that was the order. That's it. So 10 the rest, Eve was supposed to put in whatever she 11 wanted. 12 Q. The notes indicate that you -- you were 13 talking about [REDACTED] being a Russian, 14 14 years old, that lived in Epstein's apartment? 15 A. No. I never said that. 16 Q. You weren't there then? 17 A. No. I never said that. So whoever 18 wrote that, I was never -- 19 Q. This is written off typing notes because 20 obviously we didn't have a reporter to get it 21 down. So that's why I wanted to get her here so 22 that we know exactly what your story is. It would 23 make it easier. 24 A. I heard of that girl. And I remember 25 clearly that it was a problem with her visa. And</p>	<p style="text-align: right;">56</p> <p>1 Q. The F.B.I. 2 A. Yes. 3 Q. When was that? 4 A. In 2008. 5 Q. 2008? 6 A. Yes. 7 Q. And where did you meet with them? 8 A. In my office at the Four Ambassadors. 9 Q. At the Four Ambassadors. That's where 10 Sergio is, too, right? 11 A. Yeah. 12 Q. So do you still see Sergio? 13 A. I spoke with him sometimes; once in a 14 while. 15 Q. Did Sergio have to speak with the 16 F.B.I., as well? 17 A. I don't know. 18 Q. Do you know of anybody else that spoke 19 with the F.B.I. about Jeffrey Epstein? 20 A. I don't know. I don't think Eva spoke 21 with him -- with them. I don't know. 22 Q. And what did you tell the F.B.I.? 23 A. I told them everything that I -- the 24 same thing that I knew. At that time I even had 25 maybe more information. I gave everything from</p>
<p style="text-align: right;">55</p> <p>1 that's why she -- I remember there was a -- end of 2 the year and I was with Eve in New York and she 3 was, like, really upset because they were, like, 4 mistreating her because of that; the fact that 5 they were blaming her for the papers, doing it 6 incorrectly. And then Eve told me, you know, that 7 girl never work, she was never a model. She was 8 living in his place but she disappear. So she 9 actually never even worked as a model. 10 Q. [REDACTED] 11 A. Yeah. 12 Q. And that's just something Eve knows 13 because Eve was there? 14 A. Yes. 15 Q. All right. Do you know where Eve works 16 now? 17 A. At Hope Community. 18 Q. What's that? 19 A. It's a government organization in New 20 York. 21 Q. Has she spoken with the F.B.I.? 22 A. I don't know. 23 Q. Have you been contacted by the F.B.I. or 24 any government agency related to Jeffrey Epstein? 25 A. F.B.I.</p>	<p style="text-align: right;">57</p> <p>1 Amanda and everything like that. But the lady -- 2 Q. Nesbitt? 3 A. Yeah, Nesbitt. That was her name. She 4 was, like -- I told her, you have to go -- go to 5 Immigration. I say, go visit over there. And 6 when I call her once she told me: You know what? 7 I need -- I need fact. I need proof, I need 8 girls. 9 I say, well, I'm giving you the tools 10 that I have. There is nothing else that I can -- 11 I cannot create something because I don't create a 12 story. I tell you what it is. This is the fact. 13 You go and you can use this to also do something 14 else. But if your point is, you know, minor 15 accusations, like underage girls being with him in 16 the bed, I'm not going to say anything because I 17 don't know. I wasn't there. I don't know. What 18 I heard, my ears heard, you heard, she heard, 19 whatever. 20 Q. From Jean-Luc is the only person you 21 heard it? 22 A. Yeah. 23 Q. Or Evelyn? 24 A. Yes. That's it. 25 Q. Who probably heard it from Jean-Luc?</p>

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<p style="text-align: right;">58</p> <p>1 A. And who probably heard it from Jeffrey's 2 office. I don't know. 3 Q. Okay. But in terms of things that 4 happened at Jeffrey Epstein's house or homes 5 around the country, you don't know? 6 A. Nothing. We have never been involved 7 with that gentleman or his own things. Never. 8 Q. It was only a relationship with 9 Jean-Luc? 10 A. For the office. That started 2003. 11 That's when he -- that's when he actually gets 12 involved. 13 MR. EDWARDS: All right. I believe 14 I'm done. Hold on a second. 15 BY MR. EDWARDS: 16 Q. When Jeffrey Epstein was in jail, did 17 you know of Jean-Luc going to see him regularly? 18 A. No. 19 Q. Did you even know that he went to jail? 20 A. Yeah. 21 Q. I mean, at some point in time, but while 22 he was in jail, did you know for any other reason 23 other than newspapers that he was there? 24 A. No. 25 Q. Have you ever heard of this guy, Joe</p>	<p style="text-align: right;">60</p> <p>1 underage girls? 2 A. At that time, it was Evelyn Valenzuela 3 in New York. And whenever she was not able to do 4 it, she hired an attorney. I don't know the name 5 of the attorney in New York. And in Miami the 6 person who was doing everything for visas was Luis 7 Font. 8 Q. Who are the people that -- that are -- 9 you know most of Jean-Luc's friends. Who are the 10 people who dislike Jean-Luc? Who are the people 11 we should talk to about they know him, they're 12 familiar with him, but they're going to tell us -- 13 A. Talk to Khalid. 14 Q. Khalid? 15 A. Yeah, talk to Khalid. Talk to Amanda. 16 Q. You don't know how to track Khalid down 17 right now? 18 A. Amanda can give you the information of 19 Khalid. 20 Q. Amanda Grant? 21 A. Yes. And I'm going to give you a 22 letter -- I'll send you an e-mail of Amanda's 23 telephone number. I go into my Facebook and I ask 24 her. 25 Q. Okay.</p>
<p style="text-align: right;">59</p> <p>1 Pagano (phonetic)? 2 A. No. 3 Q. Larry Vasasky (phonetic), do you know 4 the pilot? 5 A. No. With his personal things, we 6 never -- as far as I know, me personally, never. 7 Q. Yeah, no, I'm only asking you about 8 people who were on flights with Jeffrey Epstein 9 and Jean-Luc. So that's why I was thinking that 10 maybe Jean-Luc would say who was on that flight. 11 A. No, because I know one time I know he 12 came in his plane and he forgot Gucci pants in his 13 airplane. So we had to go to the airport to pick 14 up the pants. But I had to wait outside and 15 somebody went inside to pick up the pants. 16 Q. [REDACTED] (phonetic); do you 17 know who that is? 18 A. No. 19 Q. Was there a Colombian girl, 13 years 20 old, approximately, being protected by Jean-Luc? 21 A. Colombian girl? 22 Q. That's all the information that I have. 23 No? 24 A. No. 25 Q. Who else would process the visas for the</p>	<p style="text-align: right;">61</p> <p>1 A. And who else? Who else? Talk toELIT. 2 There is -- there is a lot of people in New York. 3 But you ask Eve. Ask Eve. She can give you the 4 names. I don't know the names exactly. I gave 5 Conchita a name. And I thought that this woman 6 was really upset with him. But when she call her, 7 it was, like, the girl was talking too much 8 flowers about him. So it's, you know -- 9 Q. So you never know? 10 A. Yeah. You never know. That is true. 11 You never know. Five thousand dollars in Brazil 12 is a lot of money. You know, you can buy a house. 13 Q. So you can also buy somebody to be 14 quiet? 15 A. Money talks. That's what they doing all 16 the time. 17 Q. Do you know of Epstein paying anybody 18 off during this whole litigation? 19 A. If I know, I don't know. But I can say 20 that, yes, because if it wasn't Jeffrey Epstein, 21 if it would be Juan Perez, believe me, Juan Perez 22 would be put in jail forever and ever. 23 Q. Who? 24 A. I'm giving you a name. 25 Q. Oh, right. Right.</p>

<p style="text-align: right;">62</p> <p>1 A. Because he's Jeffrey Epstein and he has 2 all the money he has, he could shut up everybody. 3 But if it would have been Juan Perez in the same 4 situation, Juan Perez would be right now all his 5 life in jail.</p> <p>6 Q. But do you know of any people that 7 Jeffrey Epstein had paid during the civil 8 litigation --</p> <p>9 A. I don't know.</p> <p>10 Q. -- to not talk or to go away?</p> <p>11 A. I don't know.</p> <p>12 Q. Or -- I mean, I'm sort of surprised that 13 we haven't heard more from the models who were in 14 New York, didn't make it as models and were only 15 up there in the apartments for Jeffrey Epstein or 16 Jean-Luc.</p> <p>17 A. Because not all the models, even if they 18 are underage, they agree to do whatever they want. 19 You know, like, in my case, I was -- when I was 20 with the girls and I was talking to the girls, I 21 always said, you know, like, you are going to do a 22 job. You're not being hired to do nothing else. 23 You work for nine to five. Even if you go to do a 24 three-day in San Francisco and the owner of this 25 company wants to ask you something, it's up to</p>	<p style="text-align: right;">64</p> <p>1 But my contract was for three days. That's not my 2 problem.</p> <p>3 Q. Who were some of the other people that 4 you found out later were trying to molest the 5 girls?</p> <p>6 A. No; I found out because I had a very 7 good relation with [REDACTED] called to 8 complain and she want all her money. If not, we 9 are suing them. So I had to call them: You know, 10 either you pay or we sue you for this. So they 11 pay.</p> <p>12 But with the other girls, I would always 13 say, you are going to do this job, we're 14 responsible to pay you for the job. Whatever you 15 want to do after is not our concern. That is up 16 to you. You're already old enough to do what 17 you're going to do. So that's why I believe most 18 of the models are not saying anything because what 19 they going to do? You know, like, they were not 20 stupid.</p> <p>21 Q. I'm more concerned with the girls who 22 were staying at the 301 East 66th Street 23 apartments.</p> <p>24 A. You can get all that information from 25 Eve. Eve has all of that. Because Eve was</p>
<p style="text-align: right;">63</p> <p>1 you. You're hired to do your job. After that, we 2 have no control.</p> <p>3 You know, they were -- there were girls 4 that they were going to do jobs of 100,000, 5 \$200,000. And they were coming, they're real 6 upset, that they never wanted to work again with 7 those people, even though they were paying. 8 Because they were, like, molesting. No way; I'm 9 here to work. That's it.</p> <p>10 Q. Who were those people?</p> <p>11 A. For example, there is a girl, a 12 Brazilian girl, what's her name? [REDACTED] 13 [REDACTED] She did a job in San Francisco. And 14 the guy wanted to --</p> <p>15 Q. Do you know her last name?</p> <p>16 A. No. No. I don't remember. And the guy 17 wanted to take her out in his yacht. And she 18 said, no, I'm going back to my hotel. I'm here to 19 do my shooting from nine to five and that's it. 20 And the guy didn't want to shoot her that next day 21 and he return her in a private plane. But we had 22 to find for her money because she had a three-day 23 shooting for \$15,000 for each day or \$20,000 each 24 day. And because she didn't want to go with him 25 in the boat, he didn't want to have her anymore.</p>	<p style="text-align: right;">65</p> <p>1 actually the one who was buying everything for 2 that place and things like that. She -- you know, 3 if she has all that information, she will give it 4 to you.</p> <p>5 Q. She would have the first and last names?</p> <p>6 A. Everything.</p> <p>7 Q. And lists and everything?</p> <p>8 A. Everything.</p> <p>9 Q. Okay. So she seems like the right 10 person to talk to?</p> <p>11 A. Yes. You know, Eve will give you 12 details on everything that has to be with New 13 York. Everything related to New York, Eve will 14 give it to you.</p> <p>15 Q. Other than that, your recommendation is 16 to talk to Khalid?</p> <p>17 A. Talk to Khalid. Talk to Amanda.</p> <p>18 Q. Amanda Grant?</p> <p>19 A. Amanda will tell you a lot of things.</p> <p>20 Q. And she is here?</p> <p>21 A. She's in Miami. Yeah, she's in Miami.</p> <p>22 Q. If I find [REDACTED] will she 23 talk?</p> <p>24 A. You can try.</p> <p>25 Q. I mean, she is obviously someone who</p>

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<p style="text-align: right;">66</p> <p>1 knows, right?</p> <p>2 A. Yeah, you can try.</p> <p>3 Q. I mean, you know her as a person.</p> <p>4 A. Yes.</p> <p>5 Q. So is she somebody who seems like</p> <p>6 would --</p> <p>7 A. If you start saying that she can make a</p> <p>8 lot of money, she will talk. That's it. That's</p> <p>9 the only way you're going to get what you want.</p> <p>10 Q. That's the only reason why anybody is</p> <p>11 going to talk?</p> <p>12 A. Yeah. You have to start -- if you don't</p> <p>13 start with that, nobody is going to open their</p> <p>14 mouth. Why? For what? They have to know that if</p> <p>15 they're going to open their mouth, they're going</p> <p>16 to get something for their words. If everybody</p> <p>17 start knowing that they will be able to make</p> <p>18 money, you're not going to have one; you're going</p> <p>19 to have hundreds. You know, if -- if -- talk to</p> <p>20 Eve. Ask Eve. And, you know, give me a call</p> <p>21 later. And if you want, give you the name of</p> <p>22 people in Brazil that you're going to call and</p> <p>23 start -- if you start saying, look, if you</p> <p>24 cooperate and you tell me everything you know</p> <p>25 because, you know, you will be able to make</p>	<p style="text-align: right;">68</p> <p>1 A. He used to live in 1100 West Avenue in</p> <p>2 the penthouse. Not anymore.</p> <p>3 Q. Other than Jeff Fuller, that's the only</p> <p>4 real friend here?</p> <p>5 A. Other than Jeff Fuller. Jeff Fuller is</p> <p>6 his partner. You know, Corrado is another friend</p> <p>7 of him but I don't know his last name. He lives</p> <p>8 here in Miami.</p> <p>9 Q. How do you spell the first name?</p> <p>10 A. C-O-R-R-A-D-O. He's an Italian guy.</p> <p>11 That's another person he is very close, very</p> <p>12 close, friend of Jean-Luc since Europe. But if</p> <p>13 you don't go to him saying about the money,</p> <p>14 Corrado is not going to talk. And if you talk to</p> <p>15 Corrado about money, believe me, you're not going</p> <p>16 to have one; you're going to have 20 names and</p> <p>17 you're going to have 20 cases.</p> <p>18 Pero, if you don't go with your tool,</p> <p>19 which is going to be, okay, we can make money, we</p> <p>20 can do this, we can do that, they're not going</p> <p>21 to -- they're not go to sell his friend because</p> <p>22 they go out with him. Because when they go out</p> <p>23 with Jean-Luc, Jean-Luc pays for the bills,</p> <p>24 Jean-Luc pays for the gas, Jean-Luc pays for the</p> <p>25 vacation, Jean-Luc pays for this and that; even if</p>
<p style="text-align: right;">67</p> <p>1 \$50 million, \$20 million, how much you want, let's</p> <p>2 find it. If they don't get anything like that,</p> <p>3 they're not going to do anything. They're not</p> <p>4 going to move a pencil. Because he goes with</p> <p>5 \$5,000 and they're happy.</p> <p>6 Q. Right.</p> <p>7 A. They're happy.</p> <p>8 Q. Do you know of that happening already?</p> <p>9 A. Yeah. I can say with -- with this</p> <p>10 woman, that is probably with Conchita. That woman</p> <p>11 hate him.</p> <p>12 Q. Hates Jeff Epstein?</p> <p>13 A. No, Jean-Luc. And now she's, like, the</p> <p>14 best friend. Jean-Luc never pay her \$50,000 he</p> <p>15 owe her. And maybe, finally, he pay it and</p> <p>16 whatever, and now he has her in his pocket.</p> <p>17 Q. Who else does Jean-Luc stay with when</p> <p>18 he's here?</p> <p>19 A. I don't know -- he doesn't stay anymore</p> <p>20 in his apartment. He has a house now. He rents a</p> <p>21 house. So I know --</p> <p>22 Q. In New York?</p> <p>23 A. No, in Miami. In New York, he's still</p> <p>24 in the place of Jeffrey Epstein.</p> <p>25 Q. Oh, okay. And down here he stays --</p>	<p style="text-align: right;">69</p> <p>1 he doesn't have any money to pay his payroll.</p> <p>2 Q. How much time does Jean-Luc spend in</p> <p>3 France?</p> <p>4 A. Very little. Very little. He's</p> <p>5 traveling all over the world. He's traveling all</p> <p>6 over the world.</p> <p>7 Q. And does he have money problems?</p> <p>8 A. Yeah. He doesn't have any money.</p> <p>9 Q. He doesn't?</p> <p>10 A. Jean-Luc doesn't have any money.</p> <p>11 Q. Where does he get the money from, then?</p> <p>12 A. From the company. First you have to pay</p> <p>13 Jean-Luc's credit cards and expenses before you</p> <p>14 pay anybody else.</p> <p>15 Q. That's the rules?</p> <p>16 A. Yeah. He's -- his American Express</p> <p>17 comes for \$50,000. Of course, maybe 20 are</p> <p>18 tickets for the models, that they going to be</p> <p>19 reimbursed by the client, but 30,000 are his</p> <p>20 expenses. And he says, no, that's scouting. So</p> <p>21 we have to pay for that.</p> <p>22 Q. Okay. Who are the other scouts for MC</p> <p>23 Squared?</p> <p>24 A. Khalid was one. Jeff Fuller is another</p> <p>25 one. There is another woman, Nicolette. What's</p>

18 (Pages 66 to 69)

70	<p>1 her name? Something like that, is her name. I</p> <p>2 don't recall her name. She does the scouting,</p> <p>3 too.</p> <p>4 Q. Okay.</p> <p>5 A. In New York he had another scouter. A</p> <p>6 Jewish guy. But now he has the office of MC</p> <p>7 Squared in Tel Aviv. You can talk to him, too. I</p> <p>8 don't recall his name. But it's in the Web page</p> <p>9 of MC Squared.</p> <p>10 Q. Okay. Yeah, but he's Jean-Luc's friend,</p> <p>11 right?</p> <p>12 A. Yeah, but money talks.</p> <p>13 Q. Are there any of the other modeling</p> <p>14 agencies that are not friendly with MC Squared?</p> <p>15 Such as Ford Modeling Agency; is that someone?</p> <p>16 A. There is a guy in New York that you have</p> <p>17 to talk to.</p> <p>18 Q. Who is that?</p> <p>19 A. Uh, what his name? What his name?</p> <p>20 Jean-Luc sue him and then he sue him and he won,</p> <p>21 because Jean-Luc never paid two girls. And he was</p> <p>22 the -- the general manager of New York. And he</p> <p>23 opened his own agency and he did much better than</p> <p>24 Jean-Luc.</p> <p>25 Q. Do you remember the name of the agency?</p>	72	<p>1 to be in touch, maybe with the trial</p> <p>2 subpoena. Hopefully we can just tell</p> <p>3 you that it's off, if things are off.</p> <p>4 If it's on, then I'll let you know. But</p> <p>5 you can just call my office and I'll</p> <p>6 tell you.</p> <p>7 THE WITNESS: Okay. But I'm going</p> <p>8 to call you --</p> <p>9 MR. EDWARDS: All of the Federal</p> <p>10 trial subpoenas tell you that you have</p> <p>11 to be there on that day. But you can</p> <p>12 just call me and I'll tell you whether</p> <p>13 you really have to be there or you</p> <p>14 don't.</p> <p>15 THE WITNESS: This is July 19.</p> <p>16 MR. EDWARDS: Right.</p> <p>17 THE WITNESS: This is for which</p> <p>18 one?</p> <p>19 MR. EDWARDS: It's just one of the</p> <p>20 very many Jane Does.</p> <p>21 THE WITNESS: And this is another</p> <p>22 subpoena?</p> <p>23 MR. EDWARDS: It's for trial.</p> <p>24 MR. FISTEN: It's just for trial.</p> <p>25 (Thereupon, the Sworn Statement was</p>
71	<p>1 A. It's one -- can be One Model.</p> <p>2 Q. One?</p> <p>3 A. Yeah. It's Scott. That's his name,</p> <p>4 Scott and One Management. If there is a person</p> <p>5 that is going to talk everything for Jean-Luc,</p> <p>6 it's going to be him.</p> <p>7 Q. And have you seen pictures of Jean-Luc</p> <p>8 and underage girls in any other context other than</p> <p>9 at model shoots, parties or whatever?</p> <p>10 A. Parties, yeah. There were pictures. He</p> <p>11 has pictures in his Facebook with the girls,</p> <p>12 hugging the girls or whatever.</p> <p>13 Q. Right. Any with Jeffrey Epstein?</p> <p>14 A. No. I don't think so.</p> <p>15 Q. Have you ever seen any pictures with</p> <p>16 Jeffrey Epstein and the models?</p> <p>17 A. The ones that he took at the party.</p> <p>18 Q. Do you know where those are?</p> <p>19 A. No. In Jean-Luc's computer.</p> <p>20 Q. Okay. Has Jean-Luc ever talked about</p> <p>21 any of the cases involving Jeffrey Epstein?</p> <p>22 A. Never.</p> <p>23 Q. To you or anybody else that you know?</p> <p>24 A. No, not that I know.</p> <p>25 MR. EDWARDS: All right. I'm going</p>	73	<p>1 concluded at 5:23 p.m.)</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p>1 CERTIFICATE OF OATH</p> <p>2</p> <p>3</p> <p>4 STATE OF FLORIDA)</p> <p>5 COUNTY OF MIAMI-DADE)</p> <p>6</p> <p>7</p> <p>8 I, the undersigned authority, certify that</p> <p>9 [REDACTED] personally appeared before me and</p> <p>10 was duly sworn.</p> <p>11 WITNESS my hand and official seal this 24th</p> <p>12 day of June, 2010.</p> <p>13</p> <p>14</p> <p>15 _____</p> <p>16 ELAINE CRANDALL</p> <p>17 Notary Public - State of Florida</p> <p>18 My Commission No. DD710458</p> <p>19 Expires: December 28, 2011</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>74</p>
<p>1 CERTIFICATE OF REPORTER</p> <p>2</p> <p>3</p> <p>4 STATE OF FLORIDA :</p> <p>5 : SS.</p> <p>6 COUNTY OF MIAMI-DADE :</p> <p>7</p> <p>8 I, ELAINE CRANDALL, Registered Professional</p> <p>9 Reporter and Notary Public in and for the State of</p> <p>10 Florida at Large, do hereby certify that I</p> <p>11 reported the Sworn Statement of [REDACTED]</p> <p>12 witness called in the above-styled cause, and that</p> <p>13 the foregoing pages, numbered from 1 to 74,</p> <p>14 inclusive, constitute a true and correct</p> <p>15 transcription of my shorthand report of the</p> <p>16 deposition by said witness.</p> <p>17 I further certify that I am not an attorney</p> <p>18 or counsel of any of the parties, nor a relative</p> <p>19 or employee of any attorney or counsel connected</p> <p>20 with the action, nor financially interested in the</p> <p>21 action.</p> <p>22 WITNESS my hand and official seal in the City</p> <p>23 of Miami, County of Miami-Dade, State of Florida,</p> <p>24 this 24th day of June, 2010.</p> <p>25 _____</p> <p>ELAINE CRANDALL, R.P.R.</p>	<p>75</p>