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1 IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

2 CASE No. 502008CA037319XXXMB AB

3
4
5 ■■■.,
6 Plaintiff,
7

8 -vs-

9 JEFFREY EPSTEIN,
10 Defendant.

11
12
13 CONTINUED DEPOSITION OF JEFFREY EPSTEIN
14 VOLUME III

15
16 Thursday, October 8, 2009

17
18 1:46 - 3:48 p.m.

19
20 250 South Australian Avenue
Suite 1400
21 West Palm Beach, Florida 33401

22
23 Reported By:
24 Jeana Ricciuti, RPR, FPR, CLR
Notary Public, State of Florida
25 Prose Court Reporting Agency, Inc.

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22 Phone: [REDACTED]
23 ALSO PRESENT:
24 DAN DOSKEY, VIDEOGRAPHER
VISUAL EVIDENCE, INC.

25
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1 - - -
E X H I B I T S

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3 WITNESS: CONT'D DIRECT
4 JEFFREY EPSTEIN
5 BY MR. KUVIN 175

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1 P R O C E E D I N G S

2
3 THE VIDEOGRAPHER: We're back on the record at
4 1:46.

5 CONTINUED DIRECT EXAMINATION
6 BY MR. KUVIN:

7 Q. Do you personally know John Mack, former CEO
8 at Morgan Stanley?

9 A. I'll have to answer that the same way I've
10 answered most of your questions here today, Mr. Kuvin,
11 which is, I intend to respond to all relevant questions

12 regarding this lawsuit; however, at the present time, my
13 attorneys have counseled me I cannot provide answers to
14 any questions relevant to this lawsuit. I must accept
15 this advice or risk losing my 6th Amendment right to
16 effective representation. Accordingly, I assert my
17 federal constitutional rights as guaranteed by the 5th,
18 6th and 14th Amendment to the United States
19 Constitution.

20 MR. KUVIN: Okay. Same deposition as shown
21 before, different clip. I'm going to play it for
22 counsel first.

23 MR. PIKE: Thank you.

24 MR. KUVIN: Mr. Videographer, just let me know
25 when you're ready.

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1 THE VIDEOGRAPHER: Whenever you are.

2 MR. KUVIN: Okay.

3 (Video played.)

4 VIDEO WITNESS: "What did I do to Jeffrey and
5 what did Jeffrey do to me? I went up there
6 multiple times; I can't count. And I would be on a
7 massage table, massaging his legs, he would turn
8 over, his penis would be hanging out. He would put
9 a vagina -- or a vibrator to my vagina. He would
10 touch my vagina with his fingers. He would touch
11 my breasts. He would try to kiss my mouth. He
12 would bring my hands toward his penis."

13 (Video stopped.)

14 MR. KUVIN: Okay.

15 MR. PIKE: I'm just going to object to the use
16 of the video as to relevance, predicate and
17 foundation.

18 BY MR. KUVIN:

19 Q. All right. Let me get it back to the same
20 location.

21 Sir, first of all, once again, just so I can
22 lay the foundation for this, do you recognize this girl?

23 A. I'm going to have to respond to that question
24 the same way I've responded to most of your other
25 questions here today, which is, I intend to respond to

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1 all relevant cannot provide answers to any questions
2 relevant to this lawsuit; however, at the present time,
3 my attorneys have counseled me I cannot provide answers
4 to any questions relevant to the lawsuit. I must accept
5 this advice or risk losing my 6th Amendment right to
6 effective representation. Accordingly, I assert my
7 federal constitutional rights as guaranteed by the 5th,
8 6th and 14th Amendment to the United States
9 Constitution.

10 Q. Did this girl bring [REDACTED] to your home for a
11 naked massage?

12 A. I'm going to have to respond to that the same
13 way I've responded to most of your other questions here
14 today, which is, I intend to respond to all relevant
15 questions regarding this lawsuit; however, at the
16 present time, my attorneys have counseled me I cannot
17 provide answers to any questions that may be relevant to
18 the lawsuit. I must accept this advice or risk losing
19 my 6th Amendment right to effective representation.
20 Accordingly, I assert my federal constitutional rights
21 as guaranteed by the 5th, 6th and 14th Amendment to the
22 United States Constitution.

23 Q. I'd like to play this clip for you and then
24 I'm going to ask you a question.

25 MR. PIKE: The same clip you just played?

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1 MR. KUVIN: Exactly.

2 MR. PIKE: Same objection.

3 (Video played.)

4 VIDEO WITNESS: "What did I do to Jeffrey and
5 what did Jeffrey do to me? I went out there
6 multiple times; I can't count. And I would be on a
7 massage table, massaging his legs. He would turn
8 over, his penis would be hanging out. He would put
9 a vagina -- or vibrator to my vagina. He would
10 touch my vagina with his fingers. He would touch
11 my breasts. He would try to kiss my mouth. He
12 would bring my hands toward his penis."

13 (Video stopped.)

14 BY MR. KUVIN:

15 Q. Did you do that with that girl?

16 MR. PIKE: Form.

17 THE WITNESS: I intend to respond to all
18 relevant questions regarding this lawsuit; however,
19 at the present time, my attorneys have counseled me
20 I cannot provide answers to any questions that may
21 be relevant to this lawsuit. I must accept this
22 advice or risk losing my 6th Amendment right to
23 effective representation. Accordingly, I must
24 assert my federal constitutional rights as
25 guaranteed by the 5th, 6th and 14th Amendment to

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1 the United States Constitution.

2 BY MR. KUVIN:

3 Q. Did you do what that young lady described just
4 now to hundreds of women, including [REDACTED].?

5 MR. PIKE: Form, argumentative, harassing,
6 lacks appropriate predicate, foundation, lacks
7 identity.

8 THE WITNESS: Excuse me. I'm going to respond
9 to that the same way I've responded to most of your
10 other questions here today, which is, I intend to
11 respond to all relevant questions regarding this
12 lawsuit; however, at the present time, my attorneys
13 have counseled me that I cannot provide answers to
14 any questions relevant to the lawsuit. I must
15 accept their advice or risk losing my 6th Amendment
16 right to effective representation. Accordingly, I
17 must assert my federal constitutional rights as
18 guaranteed by the 5th, 6th and 14th Amendment to
19 the United States Constitution.

20 BY MR. KUVIN:

21 Q. While [REDACTED] was standing naked in your home,
22 specifically in your bathroom, did you tell her that you
23 could get her an interview as a model because of your
24 connections?

25 A. I'm going respond to that the same way I've

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1 responded to most of your questions today, Spencer. I
2 intend to respond to all relevant questions regarding
3 this lawsuit; however, at the present time, my attorneys
4 have counseled me I cannot provide answers to any
5 questions that may be relevant to the lawsuit. I must
6 accept this advice or risk losing my 6th Amendment right
7 to effective representation. Accordingly, I must assert

8 my federal constitutional right as guaranteed by the
9 5th, 6th and 14th Amendment to the United States
10 Constitution.

11 MR. PIKE: Same objection to that line of
12 questioning.

13 BY MR. KUVIN:

14 Q. As [REDACTED] was standing naked in your bathroom
15 before you when she was 15, did you ask her to turn
16 around so you could see her ass better?

17 MR. PIKE: Form, argumentative, harassing,
18 lacks appropriate predicate, foundation.

19 THE WITNESS: I'll respond to that as I
20 responded to your last question, which is, I intend
21 to respond to all relevant questions regarding this
22 lawsuit; however, at the present time, my attorneys
23 have counseled me I cannot provide answers to any
24 questions that may be relevant to this lawsuit. I
25 must accept their advice or risk losing my 6th

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1 Amendment right to effective representation;
2 therefore, I must assert my federal constitutional
3 rights as guaranteed by the 5th, 6th and 14th
4 Amendment to the United States Constitution.

5 BY MR. KUVIN:

6 Q. When [REDACTED] was 15 years old and standing naked
7 in front of you in your bathroom, did you tell her that
8 you could help her become a model?

9 MR. PIKE: Same objections, including
10 foundation.

11 THE WITNESS: Is it different than the last
12 question?

13 MR. KUVIN: Uh-huh.

14 MR. GOLDBERGER: Just go ahead.

15 THE WITNESS: Okay. I intend to respond to
16 all relevant questions pertaining to this lawsuit;
17 however, at the present time, my attorneys have
18 counseled me I cannot provide answers to any
19 questions that may be relevant to this lawsuit, so
20 I've answered most questions here today the same
21 way. I must expect that -- accept their advice or
22 risk losing my 6th Amendment right to effective
23 representation. Accordingly, I assert my federal
24 constitutional rights as guaranteed by the 5th, 6th
25 and 14th Amendment to the United States

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1 Constitution.

2 BY MR. KUVIN:

3 Q. Who is Ghislaine Maxwell?

4 A. I intend to respond to all relevant questions
5 regarding this lawsuit; however, at the present time, my
6 attorneys have counseled me that I cannot provide
7 answers to any questions relevant to this lawsuit. As I
8 have done to most of your other questions here today, I
9 must accept their advice or risk losing my 6th Amendment
10 right to effective representation. Accordingly, I
11 assert my federal constitutional rights as guaranteed by
12 the 5th, 6th and 14th Amendment to the United States
13 Constitution.

14 MR. KUVIN: Let me show the camera what we'll
15 mark as Exhibit 9 to this deposition.

16 THE VIDEOGRAPHER: Okay.

17 (Plaintiff's Exhibit No. 9 was marked for
18 identification.)

19 BY MR. KUVIN:
20 Q. Let me show you what we've marked as Exhibit 9
21 to your deposition. Do you recognize Ghislaine Maxwell
22 in this photograph?
23 A. Yes.
24 Q. And who is she standing with?
25 A. Her father.

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1 Q. And her father is Robert Maxwell?
2 A. Was Robert Maxwell.
3 Q. I'm sorry, he's passed, correct?
4 A. Correct.
5 Q. She is a close friend of yours, is she not?
6 A. I'm going to respond to that question the same
7 way I've responded to most of your other questions here
8 today, Mr. Kuvin, which is, I intend to respond to all
9 relevant questions regarding to this lawsuit; however,
10 at the present time, my attorneys have counseled me I
11 cannot provide answers to any questions that may be
12 relevant to this lawsuit. I must expect -- accept their
13 advice or risk losing my 6th Amendment right to
14 effective representation. Accordingly, I must assert my
15 federal constitutional rights as guaranteed by the 5th,
16 6th and 14th Amendment to the United States
17 Constitution.
18 Q. Ghislaine Maxwell has accompanied you to
19 numerous social events in the last few years; isn't that
20 true?

21 MR. PIKE: Form.
22 THE WITNESS: I'm going to respond to that
23 question the same way I've responded to most of
24 your questions here today, which is, I intend to
25 respond to all relevant questions regarding your
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1 lawsuit; however, at the present time, my attorneys
2 have counseled me I cannot provide answers to any
3 questions that may be relevant to that lawsuit. I
4 must accept their advice or risk losing my 6th
5 Amendment right to effective representation.
6 Accordingly, I must assert my federal
7 constitutional right as guaranteed by the 5th, 6th
8 and 14th Amendment of the United States
9 Constitution.

10 BY MR. KUVIN:
11 Q. One of your houseboys that has been deposed in
12 this case testified that you were a rather nice
13 gentleman that used to talk to the staff, and that when
14 Ms. Maxwell came into the picture, that you stopped
15 talking to the staff and the staff had to communicate
16 through Ms. Maxwell. Do you agree or disagree with
17 that?

18 MR. PIKE: Form, foundation, predicate,
19 argumentative, assumes facts not in evidence.
20 THE WITNESS: I'm going to answer that the
21 same way I've answered most of your questions here
22 today, which is, I intend to respond to all
23 relevant questions regarding this lawsuit; however,
24 at the present time, my attorneys have counseled me
25 that I cannot provide answers to any questions that
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1 may be relevant to your lawsuit. I must accept
2 their advice or risk losing my 6th Amendment right
3 to effective representation. Accordingly, I assert

4 my federal constitutional rights as guaranteed by
5 the 5th, 6th and 14th Amendment of the United
6 States Constitution.

7 BY MR. KUVIN:

8 Q. He also testified that he felt you were a
9 rather normal guy until Ms. Maxwell came into the
10 picture, and that she led you into this life of
11 perversion, sexual perversion. Do you agree with that?

12 MR. PIKE: Same objections.

13 THE WITNESS: I'm going to respond to that the
14 same way I've responded to most of your questions
15 here today, Mr. Kuvin, which is, I intend to
16 respond to all relevant questions regarding this
17 lawsuit; however, at the present time, my attorneys
18 have counseled me I cannot provide answers to any
19 questions relevant to this lawsuit. I must accept
20 their advice or risk losing my 6th Amendment --
21 excuse me -- I must accept their advice or risk
22 losing my 6th Amendment right to effective
23 representation. Accordingly, I must assert my
24 federal constitutional rights as guaranteed by the
25 5th, 6th and 14th Amendment to the United States

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1 Constitution.

2 BY MR. KUVIN:

3 Q. Did Ms. Maxwell procure underaged girls for
4 you to have sexual relationships with?

5 A. I'm going to answer that question the same way
6 I've answered most of your other questions today,
7 Mr. Kuvin, which is, I intend to respond to all relevant
8 questions regarding this lawsuit; however, at the
9 present time, my attorneys have counseled me I cannot
10 provide answers to any questions relevant to that
11 lawsuit. Excuse me. I must accept their advice or risk
12 losing my 6th Amendment right to effective
13 representation. Accordingly, I must assert my federal
14 constitutional rights as guaranteed -- guaranteed by the
15 5th, 6th and 14th Amendments to the United States
16 Constitution.

17 Q. Ms. Maxwell procured a particular underaged
18 girl who worked at Donald Trump's Maralago, for you to
19 have a sexual relationship with; isn't that true?

20 MR. PIKE: Form, argumentative, lacks
21 appropriate predicate, foundation, assumes facts
22 not in evidence.

23 THE WITNESS: I'm going to respond to that the
24 same way I've responded to most of your other
25 questions here today, Mr. Kuvin, which is, I intend

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1 to respond to all relevant questions regarding this
2 lawsuit; however, at the present time, my attorneys
3 have counseled me I cannot provide answers to any
4 questions relevant to that lawsuit. I must accept
5 their advice or risk losing my 6th Amendment right
6 to effective representation. Therefore, I assert
7 my federal constitutional rights as guaranteed by
8 the 5th, 6th and 14th Amendments to the United
9 States Constitution.

10 BY MR. KUVIN:

11 Q. Do you know where Donald Trump's Maralago
12 estate is?

13 A. Yes.

14 Q. Have you been there?

15 A. Yes.
16 Q. Who with?
17 A. I'm going to have to answer that question the
18 same way I've answered most of your other questions here
19 today. I intend to respond to all relevant questions
20 regarding this lawsuit; however, at the present time, my
21 attorneys have counseled me I cannot provide answers to
22 any questions that may be relevant to the same lawsuit.
23 I must accept their advice or risk losing my 6th
24 Amendment right to effective representation.
25 Accordingly, I must assert my federal constitutional

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1 rights as guaranteed by the 5th, 6th and 14th Amendment
2 to the United States Constitution.

3 Q. Have you seen the high school transcripts
4 grades of girls that you have had sexual relationships
5 with dating back to 2005?

6 MR. PIKE: Form, relevance, improper
7 hypothetical, lacks facts -- assumes facts not in
8 evidence, lacks appropriate predicate, foundation.

9 THE WITNESS: I'm going to answer that
10 question the same as I've answered most of your
11 other questions here today, Mr. Kuvin, which is, I
12 intend to respond to all relevant questions
13 regarding this lawsuit; however, at the present
14 time, my attorneys have counseled me that I cannot
15 provide answers to any questions that may be
16 relevant to this lawsuit. I must accept their
17 advice or risk losing my 6th Amendment right to
18 effective representation. Accordingly, I assert my
19 federal constitutional rights as guaranteed by the
20 5th, 6th and 14th Amendment to the United States
21 Constitution.

22 BY MR. KUVIN:

23 Q. Do you deny that the high school transcripts
24 which were found in your trash on Palm Beach that showed
25 the ages of some of the girls you were engaged with

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1 sexual acts with at your home came from your house?

2 MR. PIKE: Same objection in addition to
3 argumentative and harassing.

4 THE WITNESS: I intend to respond to all
5 relevant questions regarding this lawsuit; however,
6 as I've done with most of your other questions
7 today, at the present time my attorneys have
8 counseled me that I cannot provide answers to any
9 of those questions relevant to this lawsuit. I
10 must accept their advice or risk losing my 6th
11 Amendment right to effective representation.
12 Accordingly, I must assert my federal
13 constitutional rights as guaranteed by the 5th, 6th
14 and 14th Amendments to the United States
15 Constitution.

16 BY MR. KUVIN:

17 Q. Did you have numerous photos of nude young
18 women, girls under the age of 18, back in your home
19 in -- on Palm Beach Island in 2005 and 2006?

20 A. I'm going to have to respond to that question
21 the same way I've responded to most of your questions
22 here today, which is, I intend to respond to all
23 relevant questions regarding this lawsuit; however, at
24 the present time, my attorneys have counseled me I
25 cannot provide answers to any questions relevant to the

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1 same lawsuit. I must accept their advice or risk losing
2 my 6th Amendment right to effective representation.
3 Accordingly, I must assert my federal constitutional
4 rights as guaranteed by the 5th, 6th and 14th Amendment.

5 Q. Did you have photographs of girls under the
6 age of ten who were nude, either partially or fully
7 nude, in your home on Palm Beach in 2005 and 2006?

8 MR. PIKE: Form.

9 THE WITNESS: I'm going to respond to that
10 question the same way I've responded to most of
11 your other questions, which is, I intend to respond
12 to all relevant questions regarding this lawsuit;
13 however, at the present time, my attorneys have
14 counseled me I cannot provide answers to any
15 questions relevant to this lawsuit. I must accept
16 this advice or risk losing my 6th Amendment right
17 to effective representation. Accordingly, I assert
18 my federal constitutional rights as guaranteed by
19 the 5th, 6th and 14th Amendments of the United
20 States Constitution.

21 THE VIDEOGRAPHER: Mr. Kuvin, I'm sorry I have
22 to change.

23 MR. KUVIN: Go ahead.

24 THE VIDEOGRAPHER: We'll go off the record at
25 2:03. This will be the end of tape No. 2.

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1 MR. GOLDBERGER: Break time?

2 MR. KUVIN: No, not again. Please not.

3 Just let us know when you're good to go.

4 THE VIDEOGRAPHER: We're back on the record at

5 2:04. This will be the beginning of tape No. 3.

6 BY MR. KUVIN:

7 Q. Do you have security cameras throughout your
8 home on Palm Beach Island?

9 A. I'm going to answer that question the same way
10 I've answered most of your questions here today,
11 Mr. Kuvin. I intend to respond to all relevant
12 questions regarding this lawsuit; however, at the
13 present time, my attorneys have counseled me I cannot
14 provide answers to any questions relevant to the
15 lawsuit. I must accept their advice or risk losing my
16 6th Amendment right to effective representation.
17 Accordingly, I assert my federal constitutional rights
18 as guaranteed by the 5th, 6th and 14th Amendment to the
19 United States Constitution.

20 (Plaintiff's Exhibit No. 10 was marked for
21 identification.)

22 MR. KUVIN: I'll show the camera a photograph
23 here. Okay?

24 THE VIDEOGRAPHER: Lift it up. Yeah, there
25 you go. Okay.

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1 MR. KUVIN: Okay?

2 BY MR. KUVIN:

3 Q. Let me show you what we marked as Plaintiff's
4 Exhibit 10. Do you recognize this young lady?

5 A. Yes.

6 Q. Who is she?

7 A. Her name is Joanna Shogert (phonetic).

8 Q. And who is she?

9 A. I just -- her name is Joanna Shogert.

10 Q. How do you recognize her?

11 A. I don't understand the question.
12 Q. Well, is she a friend of yours? Did she work
13 for you? How do you recognize her?
14 A. How do I recognize her?
15 Well, I'd like to respond to that question
16 but, however, my attorneys have told me that I can't
17 respond to any questions today that may -- excuse me. I
18 intend to respond to all relevant questions regarding
19 this lawsuit; however, at the present time, my attorneys
20 have counseled me that I cannot provide answers to any
21 questions relevant to this lawsuit. I must accept their
22 advice or risk losing my 6th Amendment right to
23 effective representation. Accordingly, I assert my
24 federal constitutional rights as guaranteed by the 5th,
25 6th and 14th Amendment to the United States

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1 Constitution.
2 Q. Did you have sex with Joanna Shogert?
3 A. I'm going to answer that question like I've
4 answered most of your questions here today, which is, I
5 intend to respond to all relevant questions regarding
6 this lawsuit; however, at the present time, my attorneys
7 have counseled me I cannot provide answers to any
8 questions relevant to this lawsuit. I must accept their
9 advice or risk losing my 6th Amendment right to
10 effective representation. Accordingly, I assert my
11 federal constitutional rights as guaranteed by the 5th,
12 6th and 14th Amendment to the United States
13 Constitution.

14 Q. When did you first meet Prince Andrew?
15 And let me make it a compound question so I
16 don't have to repeat it over and over. When did you
17 first meet Prince Andrew, under what conditions did you
18 meet him, and who was present at that first meeting?
19 A. I'm going to answer that question as I've done
20 most of your questions here today, Mr. Kuvin, which is,
21 I intend to respond to all relevant questions regarding
22 this lawsuit; however, at the present time, my attorneys
23 have counseled me I cannot provide answers to any
24 questions relevant to that lawsuit. I must accept their
25 advice or risk losing my 6th Amendment right to

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1 effective representation. Accordingly, I must assert my
2 federal constitutional rights as guaranteed by the 5th,
3 6th and 14th Amendment to the United States
4 Constitution.

5 MR. PIKE: In addition, relevance.

6 BY MR. KUVIN:

7 Q. Do you pay Ms. Maxwell a salary?

8 MR. PIKE: Form.

9 BY MR. KUVIN:

10 Q. Ghislaine Maxwell, so we're clear. Do you pay
11 her a salary?

12 A. I'd like -- excuse me. I'm going to answer
13 that question the same way I've answered most of your
14 questions here today, which is, I intend to answer all
15 questions relevant to this lawsuit; however, at the
16 present time, my attorneys have counseled me I cannot
17 provide answers to any questions relevant to this
18 lawsuit. I must accept their advice or risk losing my
19 6th Amendment right to effective representation.
20 Accordingly, I assert my federal constitutional rights
21 as guaranteed by the 5th, 6th and 14th Amendment to the

22 United States Constitution.

23 Q. Did you provide any underaged girls for sex to
24 Prince Andrew?

25 MR. PIKE: Form.

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1 THE WITNESS: I'm going to respond to that
2 question the same way I've responded to most of
3 your questions here today, Mr. Kuvin, which is, I
4 intend to respond to all relevant questions
5 regarding this lawsuit -- excuse me, however, at
6 the present time, my attorneys have counseled me I
7 cannot provide answers to any questions relevant to
8 the lawsuit, or might be relevant to the lawsuit.
9 I must accept their advice or risk losing my 6th
10 Amendment right to effective representation.
11 Accordingly, I assert my federal constitutional
12 rights as guaranteed by the 5th, 6th and 14th
13 Amendment of the United States Constitution.

14 BY MR. KUVIN:

15 Q. Did you fly with Prince Andrew on your plane,
16 or planes, with any underaged girls, girls under the age
17 of 18?

18 A. I'm going to answer that question the same way
19 I've answered all the other questions here today,
20 virtually, which is, I intend to respond to all relevant
21 questions regarding this lawsuit; however, at the
22 present time, my attorneys have counseled me I cannot
23 provide answers to any questions relevant to the
24 lawsuit. I must accept their advice or risk losing my
25 6th Amendment right to effective representation.

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1 Accordingly, I must assert my federal constitutional
2 rights as guaranteed by the 5th, 6th and 14th Amendments
3 to the United States Constitution.

4 Q. Do you know Christine Drangsholt?

5 MR. KUVIN: For the court reporter, it's
6 D-R-A-N-G-S-H-O-L-T.

7 THE WITNESS: I intend to respond to all
8 relevant questions regarding this lawsuit; however,
9 at the present time, my attorneys have counseled me
10 I cannot provide answers to any questions relevant
11 to the lawsuit. I must accept this advice or risk
12 losing my 6th Amendment right to effective
13 representation. Accordingly, I assert my federal
14 constitutional rights as guaranteed by the 5th, 6th
15 and 14th Amendments to the United States
16 Constitution.

17 MR. KUVIN: Let me show the camera what we'll
18 mark as Exhibit 11.

19 (Plaintiff's Exhibit No. 11 was marked for
20 identification.)

21 THE VIDEOGRAPHER: Okay.

22 MR. KUVIN: Okay?

23 BY MR. KUVIN:

24 Q. In Exhibit 11, sir, you're standing with a
25 woman. Who is that woman in that photograph?

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1 A. Eula Maxwell (phonetic).

2 Q. Where were you?

3 A. I intend to respond to all relevant questions
4 regarding this lawsuit; however, at the present time, my
5 attorneys have counseled me I cannot provide answers to
6 any questions that may be relevant to this lawsuit. I

7 must accept this advice or risk losing my 6th Amendment
8 right to effective representation. Accordingly, I must
9 assert my federal constitutional rights as guaranteed by
10 the 5th, 6th and 14th Amendments to the United States
11 Constitution.

12 MR. KUVIN: And just so the court reporter
13 knows, Ghislaine is spelled G-H-I-S-L-A-I-N-E.
14 BY MR. KUVIN:

15 Q. Who is [REDACTED], excuse
16 me?

17 A. I'm going to answer that question the same way
18 I've answered most of your questions here today, which
19 is, I intend to respond to all relevant questions
20 regarding this lawsuit; however, at the present time, my
21 attorneys have counseled me I cannot provide answers to
22 any questions relevant to the lawsuit. I must accept
23 their advice or risk losing my 6th Amendment right to
24 effective representation. Excuse me. Accordingly, I
25 must assert my federal constitutional rights as

0198

1 guarantee -- guaranteed by the 5th, 6th and 14th
2 Amendment to the United States Constitution.

3 (Plaintiff's Exhibit No. 12 was marked for
4 identification.)

5 MR. KUVIN: Let me show to the camera what
6 we've marked as Exhibit 12.

7 BY MR. KUVIN:

8 Q. Let me show you what I've marked as Exhibit
9 12. Do you recognize any of the girls in that
10 photograph?

11 A. I'm going to answer that question the same way
12 I've answered most of your other questions here today,
13 Mr. Kuvin, which is, I intend to respond to all relevant
14 questions regarding this lawsuit; however, at the
15 present time, my attorneys have counseled me that I
16 cannot provide answers to any questions that may be
17 relevant to the lawsuit. I must accept their advice or
18 risk losing my 6th Amendment right to effective
19 representation. Accordingly, I assert my federal
20 constitutional rights as guaranteed by the 5th, 6th and
21 14th Amendment to the United States Constitution.

22 Q. Sir, isn't it true that in what we've marked
23 as Plaintiff's Exhibit 12, the blond standing on the
24 left is [REDACTED], and the blonde, dirty blonde
25 standing on the right is [REDACTED]?

0199

1 A. I intend to respond to all relevant questions
2 regarding this lawsuit; however, as I've done to most of
3 the questions at the present time, my attorneys have
4 counseled me that I cannot provide answers to any of
5 those questions that may be relevant to the lawsuit. I
6 must accept this advice or risk losing my 6th Amendment
7 right to effective representation. Accordingly, I
8 assert my federal constitutional rights as guaranteed by
9 the 5th, 6th and 14th Amendments of the United States
10 Constitution.

11 BY MR. KUVIN:

12 Q. I'm going to show you what we'll mark as
13 Exhibit 13. Let me show it to the camera, first.

14 (Plaintiff's Exhibit No. 13 was marked for
15 identification.)

16 BY MR. KUVIN:

17 Q. Sir, is it true that Exhibit 13 shows your

18 personal assistant, [REDACTED]?

19 A. I intend to respond to all relevant questions
20 regarding this lawsuit; however, at the present time, my
21 attorneys have counseled me that I cannot provide
22 answers to any questions that may be relevant to this
23 lawsuit. I must accept their advice or risk losing my
24 6th Amendment right to effective representation.
25 Accordingly, I assert my federal constitutional rights

0200

1 as guaranteed by the 5th, 6th and 14th Amendment to the
2 United States Constitution.

3 Q. Let me show you what we'll mark as Exhibit 14.
4 (Plaintiff's Exhibit No. 14 was marked for
5 identification.)

6 BY MR. KUVIN:

7 Q. Sir, does Exhibit 14 show [REDACTED], a
8 girl that you have had a sexual relationship with since
9 before she was 18 years old?

10 MR. PIKE: Form, argumentative, harassing,
11 assumes facts not in evidence, lacks appropriate
12 predicate and foundation.

13 THE WITNESS: I intend to respond to all
14 relevant questions regarding this lawsuit; however,
15 at the present time, my attorneys have counseled me
16 I cannot provide answers to any questions relevant
17 to this lawsuit. I must accept their advice or
18 risk losing my 6th Amendment right to effective
19 representation. Accordingly, I assert my federal
20 constitutional rights as guaranteed by the 5th, 6th
21 and 14th Amendment to the United States
22 Constitution.

23 BY MR. KUVIN:

24 Q. I'm going to show the camera what we'll mark
25 as Exhibit 15.

0201

1 (Plaintiff's Exhibit No. 15 was marked for
2 identification.)

3 BY MR. KUVIN:

4 Q. Sir, does Exhibit 15 show [REDACTED], an
5 underaged girl that you were utilizing back in 2005 and
6 2006 to procure other underaged girls for sex and sexual
7 contact at your home?

8 MR. PIKE: Same objections to Exhibit 15 as
9 were made to Exhibit 14.

10 THE WITNESS: I'm going to answer that the
11 same way I've answered most of your questions here
12 today, Mr. Kuvin, which is, I intend to respond to
13 all relevant questions regarding this lawsuit;
14 however, at the present time, my attorneys have
15 counseled me that I cannot provide answers to any
16 questions that may be relevant to the lawsuit. I
17 must accept their advice or risk losing my 6th
18 Amendment right to effective representation.
19 Accordingly, I am going to assert my federal
20 constitutional rights as guaranteed by the 5th, 6th
21 and 14th Amendments to the United States
22 Constitution.

23 (Plaintiff's Exhibit No. 16 was marked for
24 identification.)

25 MR. KUVIN: Let me show the camera what we've

0202

1 marked as Exhibit 16.

2 BY MR. KUVIN:

3 Q. Do you recognize the gentleman in that
4 photograph, sir?
5 MR. PIKE: Hold on for a second.
6 MR. GOLDBERGER: Do you want to discuss it
7 with me?
8 MR. PIKE: Let's take a break for one minute.
9 MR. KUVIN: All right.
10 THE VIDEOGRAPHER: Off the record at 2:16.
11 (A brief recess was taken.)
12 THE VIDEOGRAPHER: We're back on the record at
13 2:45.

14 BY MR. KUVIN:

15 Q. Okay. Do you recognize the person that's
16 shown in Exhibit 16?

17 A. Yes.

18 Q. Who is that?

19 A. Prince Andrew.

20 Q. And how do you know Prince Andrew?

21 A. I'm going to have to respond to that question
22 the same way I've responded to most of your questions
23 here today, Mr. Kuvin, which is, I intend to respond to
24 all relevant questions regarding this lawsuit; however,
25 at the present time, my attorneys have counseled me I

0203

1 cannot provide answers to any questions relevant to this
2 lawsuit. I must accept their advice or risk losing my
3 6th Amendment right to effective representation.
4 Accordingly, I assert my federal constitutional rights
5 as guaranteed by the 5th, 6th and 14th Amendment to the
6 United States Constitution.

7 Q. I'm going to show you a document that we'll
8 mark as Exhibit 17.

9 MR. PIKE: Thank you.

10 (Plaintiff's Exhibit No. 17 was marked for
11 identification.)

12 BY MR. KUVIN:

13 Q. I'm going to give you a minute to take a look
14 at that document and just tell me when you're ready to
15 answer any questions about it.

16 A. Okay.

17 Q. Okay. First of all, have you seen this letter
18 before?

19 MR. GOLDBERGER: Attorney-client privilege,
20 work product.

21 BY MR. KUVIN:

22 Q. Have you seen this letter before outside of
23 the relationship with your attorneys?

24 MR. GOLDBERGER: You can answer that question.

25 THE WITNESS: No.

0204

1 BY MR. KUVIN:

2 Q. Do you know Chief of Police Michael Reiter?
3 Do you know who he is?

4 A. I know who he is.

5 Q. Do you know State Attorney Barry Krischer?

6 A. I know who he is.

7 Q. Did you ever speak with Chief of Police
8 Michael Reiter in the past?

9 A. I don't remember.

10 Q. Did you ever talk to anyone, either at the
11 State Attorney's office, yourself, or Michael Reiter
12 about the prosecution of your claim without the presence
13 of your attorneys?

14 A. No.
15 Q. Did you ever talk to any of the police that
16 worked for the Town of Palm Beach without the presence
17 of your attorneys?
18 A. Explain --
19 MR. PIKE: Wait one second.
20 THE WITNESS: I'm sorry.
21 MR. PIKE: Can you state the question again?
22 MR. KUVIN: Sure.

23 BY MR. KUVIN:
24 Q. Did you ever speak to any of the police
25 officers that worked for the Town of Palm Beach without
0205 the presence of your attorneys?

1 MR. GOLDBERGER: Is the question, have you
2 ever spoken to a Town of Palm Beach police officer?
3 Is that the -- can we rephrase it like that?

4 MR. KUVIN: Sure.
5 MR. GOLDBERGER: Okay.
6 THE WITNESS: I've been stopped by the police
7 for traffic violations, if that's what you mean.

8 BY MR. KUVIN:
9 Q. Any other times that you had conversations
10 with any of the Town of Palm Beach --

11 A. No.
12 Q. -- police officers?
13 A. Not that I recall specifically.

14 Q. Okay. Now, you were housed at the jail after
15 your plea of guilty that we had spoke about at the
16 beginning of your deposition; is that correct?

17 MR. PIKE: Form.
18 THE WITNESS: Say it again.

19 BY MR. KUVIN:
20 Q. Yes. You were housed at the local jail here
21 in Palm Beach County after your plea of guilty that we
22 spoke about at the beginning of your deposition?

23 MR. PIKE: Form.
24 THE WITNESS: Yes.

0206 BY MR. KUVIN:
1 Q. How long were you there?
2 A. 13 months, approximately.
3 Q. All right. And of those 13 months, how many
4 months were you there where you had to stay there 24
5 hours a day?

6 A. I don't recall specifically.

7 Q. More than a month?

8 A. Yes.

9 Q. More than two months?

10 A. Yes.

11 Q. More than three months?

12 A. Yes.

13 Q. More than four?

14 A. I think so, I don't remember.

15 Q. Do you recall when you were provided work
16 release, when you were able to leave during the daylight
17 hours?

18 A. Not with specificity.

19 Q. While you were there at the jail in Palm
20 Beach -- I'm going to show you what we'll mark as
21 Exhibit 18.

22 (Plaintiff's Exhibit No. 18 was marked for
23 identification.)
24

25
0207

1 BY MR. KUVIN:

2 Q. Did you purchase items from the jail?

3 MR. GOLDBERGER: Hang on a second.

4 MR. PIKE: Hold on one second.

5 THE WITNESS: It looks that way, yes, sir.

6 BY MR. KUVIN:

7 Q. Okay.

8 MR. PIKE: And the document speaks for itself,

9 the composite document speaks for itself.

10 BY MR. KUVIN:

11 Q. I'd like you to take a look at Exhibit 18. It
12 shows purchases -- well, does it show purchases by you?

13 MR. PIKE: Asked and answered.

14 THE WITNESS: Yes.

15 BY MR. KUVIN:

16 Q. Okay. And it appears those purchases took
17 place from 7/8/08 through 9/30/08 is the last one that I
18 have; is that correct?

19 MR. PIKE: The document speaks for itself.

20 BY MR. KUVIN:

21 Q. You can answer.

22 A. The document speaks for itself.

23 Q. Is that correct, the last date is 9/30/08?

24 A. The last date here is 9/30, yes.

25 MR. PIKE: With regard to what you provided to

0208

1 the witness.

2 MR. KUVIN: Sure, absolutely.

3 THE WITNESS: Okay.

4 BY MR. KUVIN:

5 Q. And just so we're clear, this composite
6 exhibit that we've marked as Exhibit 18 contains
7 purchases from 7/8/08, 7/15, 7/22, 7/29, 8/5, 8/12,
8 8/21, 8/26, 9/2, 9/9, 9/23 and 9/30, just so the record
9 is clear; there is no question.

10 A. Okay.

11 Q. Okay?

12 A. Uh-huh.

13 Q. All right. These items that you purchased,
14 did you utilize all of these items yourself?

15 MR. PIKE: Form, relevance.

16 THE WITNESS: I don't understand the question.

17 BY MR. KUVIN:

18 Q. Well, you purchased a number of items that are
19 shown in this receipt.

20 A. Yes.

21 Q. The question is: Did you use them yourself?

22 MR. PIKE: Same objection.

23 THE WITNESS: I don't know if I used all of

24 them, so...

25

0209

1 BY MR. KUVIN:

2 Q. Well, what did you do with the items that you
3 purchased?

4 MR. PIKE: Form, overbroad.

5 BY MR. KUVIN:

6 Q. You can answer.

7 A. I used some, I threw away some.

8 Q. Did you give any away?

9 A. Not that I remember.

10 MR. PIKE: Same objection.
11 BY MR. KUVIN:
12 Q. Did you provide any items that you purchased
13 to other inmates while you were there in jail?
14 MR. PIKE: Form.
15 THE WITNESS: Not to the best of my
16 recollection.
17 BY MR. KUVIN:
18 Q. Okay. With respect to all of the items that
19 are listed in these receipts, is it a safe assumption
20 that you either used them yourself or threw them away?
21 MR. PIKE: Asked and answered. If you don't
22 know -- if you know.
23 THE WITNESS: I don't know.
24 BY MR. KUVIN:
25 Q. I'm sorry? I didn't hear you.
0210
1 MR. PIKE: Asked and answered.
2 THE WITNESS: So should I answer?
3 MR. PIKE: You can answer again.
4 THE WITNESS: Ask the question again.
5 BY MR. KUVIN:
6 Q. So can we assume that all of the items that
7 are shown in these receipts were either used by you or
8 thrown away?
9 A. I don't even know if I received some of those
10 items, so I would assume I used most of them.
11 Q. Okay.
12 A. Okay?
13 Q. Sure. Take a look, I just want to make sure,
14 did you receive all these items?
15 A. I don't know.
16 MR. PIKE: Asked and answered.
17 BY MR. KUVIN:
18 Q. How did you purchase them?
19 A. I filled out a form.
20 Q. And how were they provided to you?
21 MR. PIKE: Form.
22 THE WITNESS: Sometimes they would come in a
23 bag.
24 BY MR. KUVIN:
25 Q. Okay. And did you determine whether or not
0211
1 the form you filled out, the information or the product
2 that you put on that form actually was provided?
3 A. No, never.
4 Q. If we look at the items that are contained
5 within these receipts, I'd like you to go, if you would,
6 to the second invoice here dated 7/15/08. The third
7 item down is a Lubriderm lotion.
8 A. Yes.
9 Q. Do you see that?
10 A. Yes.
11 Q. Did you purchase that?
12 A. It appears so.
13 Q. Did you receive it?
14 A. I don't remember.
15 Q. Did you use the Lubriderm lotion that you
16 received or that you may have received in jail?
17 MR. PIKE: Form.
18 BY MR. KUVIN:
19 Q. Let me strike that and re-ask it.
20 A. Okay.

21 Q. Did you use the Lubriderm lotion which you had
22 purchased from the jail while you were there?
23 A. I might have.
24 Q. What for?
25 A. To moisturize my hands and face.

0212

1 Q. Okay. Did you use Lubriderm lotion while you
2 were in jail to masturbate at all?

3 A. No.
4 MR. PIKE: Form objection, harassing.
5 THE WITNESS: Absolutely not.

6 BY MR. KUVIN:

7 Q. It appears, if you would turn to 7/29/08,
8 which is approximately two weeks later, and the second
9 thing down is another bottle of Lubriderm lotion. Do
10 you see that?

11 A. Yes.

12 Q. What did you use that for?

13 MR. PIKE: Asked and answered.

14 MR. KUVIN: It's a second bottle.

15 MR. PIKE: It's the same question, Spencer.

16 Can we get to something relevant?

17 THE WITNESS: No problem.

18 MR. PIKE: He can answer.

19 THE WITNESS: My hands and my face.

20 BY MR. KUVIN:

21 Q. Okay.

22 A. I believe the first bottle went missing.

23 Q. If we turn to approximately one month later on
24 8/21/08, do you have that one?

25 A. Yes.

0213

1 Q. All right. On that occasion, you bought two
2 bottles of hand lotion again.

3 A. Yes.

4 Q. What did you use those for?

5 A. Nothing.

6 Q. What did you do with them?

7 A. They were bought by accident.

8 Q. How did you buy them by accident?

9 A. Because you fill out a check form and
10 sometimes the forms don't make any sense, they just
11 deliver in other things.

12 Q. Sir, did you get those two bottles?

13 A. Yes. Yes.

14 Q. And you never used them?

15 A. No. I threw them away.

16 Q. Okay. If we turn to 9/9/08, do you see that
17 entry?

18 A. Yes.

19 Q. All right. And another invoice here, on that
20 date a bottle of hand lotion, do you see that?

21 A. Yes, I do.

22 Q. Did you get it?

23 A. I don't know.

24 Q. Do you know if you used it?

25 A. Definitely not.

0214

1 Q. How do you know you definitely did not use it?

2 A. Because it was not -- anything that said hand
3 lotion I did not use, I threw in the garbage.

4 Q. Why is that?

5 A. Because it wasn't something that I had

6 ordered.

7 MR. PIKE: Can I -- can I just have an
8 agreement that the objections to this line of
9 questioning is irrelevant, so I don't have to --

10 MR. KUVIN: Sure.

11 MR. PIKE: -- interrupt.

12 MR. KUVIN: Sure.

13 MR. PIKE: Agreed?

14 MR. KUVIN: Agreed.

15 BY MR. KUVIN:

16 Q. Let's turn again to 9/30/08, the last invoice
17 in there.

18 A. Yes.

19 Q. Do you see there is an entry for two more
20 bottles of hand lotion. Do you see that?

21 A. Correct.

22 Q. What did you do with those?

23 A. To the best of my knowledge, I threw them
24 right away.

25 Q. You didn't use them for anything?

0215

1 A. No.

2 Q. Is it your testimony here today that you did
3 not use any of the bottles of hand lotion or Lubriderm
4 lotion that we had previously just gone through to
5 masturbate while you were in jail?

6 A. That's correct.

7 Q. Did Ghislaine Maxwell visit you in jail?

8 A. No.

9 Q. Did [REDACTED] visit you while you were
10 in jail?

11 A. I intend to respond to all relevant questions
12 regarding this lawsuit; however, at the present time, my
13 attorneys have counseled me I cannot provide answers to
14 any questions relevant to this lawsuit. I must accept
15 this advice or risk losing my 6th Amendment right to
16 effective representation. Accordingly, I assert my
17 federal constitutional rights as guaranteed by the 5th,
18 6th and 14th Amendment to the United States
19 Constitution.

20 Q. Did you have sex with [REDACTED] while
21 you were housed at the Palm Beach jail facility?

22 MR. PIKE: Form.

23 THE WITNESS: I intend to respond to all
24 relevant questions regarding this lawsuit; however,
25 at the present time, my attorneys have counseled me

0216

1 I cannot provide answers to any questions relevant
2 to this lawsuit. As I've answered most of your
3 question today, Mr. Kuvin, I must accept this
4 advice or risk losing my 6th Amendment right to
5 effective representation. Accordingly, I assert my
6 federal constitutional rights as guaranteed by the
7 5th, 6th and 14th Amendments to the United States
8 Constitution.

9 BY MR. KUVIN:

10 Q. Did you pay girls so that they would not
11 testify against you in the civil proceedings that have
12 been filed in both Federal and State Court?

13 MR. PIKE: Form.

14 THE WITNESS: Okay. Like most of your other
15 questions here today, Mr. Kuvin, I'm going to
16 respond by saying I intend to respond to all

17 relevant questions regarding this lawsuit; however,
18 at the present time, my attorneys have counseled me
19 I cannot provide answers to any questions relevant
20 to this lawsuit. I must accept this advice or risk
21 losing my 6th Amendment right to effective
22 representation. Accordingly, I must assert my
23 federal constitutional rights as guaranteed by the
24 5th, 6th and 14th Amendments to the United States
25 Constitution.

0217

1 BY MR. KUVIN:

2 Q. Did you have sex with [REDACTED] when
3 she was under the age of 14?

4 MR. PIKE: Form.

5 THE WITNESS: I intend to respond to all
6 relevant questions regarding this lawsuit; however,
7 at the present time, my attorneys have counseled me
8 I cannot provide answers to any questions relevant
9 to this lawsuit. I must accept this advice or risk
10 losing my 6th Amendment right to effective
11 representation. Accordingly, I must assert my
12 federal constitutional rights as guaranteed by the
13 5th, 6th and 14th Amendment to the Constitution.

14 BY MR. KUVIN:

15 Q. Did you tell people that [REDACTED] was
16 your sex slave?

17 MR. PIKE: Same objection.

18 THE WITNESS: I intend to respond to all
19 relevant questions regarding this lawsuit; however,
20 at the present time, my attorneys have counseled me
21 I cannot provide answers to any questions relevant
22 to this lawsuit. I must accept this advice or risk
23 losing my 6th Amendment right to effective
24 representation. Accordingly, I must assert my
25 federal constitutional rights as guaranteed by the

0218

1 5th, 6th and 14th Amendment to the United States
2 Constitution. Excuse me.

3 MR. KUVIN: This is 19.

4 (Plaintiff's Exhibit No. 19 was marked for
5 identification.)

6 BY MR. KUVIN:

7 Q. I have an FAA registry for a Boeing 727,
8 manufacture year 1969, with -- I'm just looking for the
9 tail number here. I'm sorry, I'm just trying to find
10 the tail number.

11 A. Not a problem.

12 Q. Let's do this, it's a Mode S Code 53106661.

13 I'll show this to your counsel first.

14 Here it is, I'm sorry, Tail No. N908JE.

15 There's no question pending just yet.

16 MR. PIKE: Thank you.

17 Okay.

18 BY MR. KUVIN:

19 Q. Let me show you what we marked as Exhibit 19.

20 I'll give you a minute to take a look at that.

21 A. Okay.

22 Q. What is JA -- EGE, Inc.?

23 A. I intend to respond to all relevant questions
24 regarding this lawsuit; however, at the present time, my
25 attorneys have counseled me I cannot provide answers to

0219

1 any questions relevant to this lawsuit. I must accept

2 this advice or risk losing my 6th Amendment right to
3 effective representation. Accordingly, as I've done
4 with most of your questions, I must assert my federal
5 constitutional rights as guaranteed by the 5th, 6th and
6 14th Amendment to the United States Constitution.

7 Q. Mr. Epstein, are you aware that after
8 September 11, 2001 that the Federal Government started
9 tracking all flights of all public and private aircraft?

10 MR. PIKE: Form, relevance.

11 BY MR. KUVIN:

12 Q. Are you aware of that?

13 A. No.

14 Q. Okay. Are you aware that the FAA keeps track
15 of all flights that are made both within the continental
16 US and from the continental US abroad?

17 MR. PIKE: Same objection.

18 THE WITNESS: No.

19 BY MR. KUVIN:

20 Q. Do you know whether or not -- let me ask it
21 this way: Have you ever seen the flight tracking
22 information for any planes that you may own?

23 A. I don't believe so.

24 Q. Is JEGE, Inc. a company that is owned by you?

25 A. I'll have to answer that question the way I've

0220

1 answered most of your other questions here today, which
2 is, I intend to respond to all relevant questions
3 regarding this lawsuit; however, at the present time, my
4 attorneys have counseled me I cannot provide answers to
5 any questions relevant to this lawsuit. I must accept
6 this advice or risk losing my 6th Amendment right to
7 effective representation. Accordingly, I assert my
8 federal constitutional rights as guaranteed by the 5th,
9 6th and 14th Amendment to the United States
10 Constitution.

11 Q. The plane that is identified in the FAA
12 registry in the document marked Exhibit 19, just so
13 we're clear, because I don't think I asked it exactly,
14 but is this your plane?

15 A. I'm going to answer that question the same way
16 I've answered most of your questions today, Mr. Kuvin,
17 which is, I intend to respond to all relevant questions
18 regarding this lawsuit; however, at the present time, my
19 attorneys have counseled me I cannot provide answers to
20 any questions relevant to this lawsuit. I must accept
21 this advice or risk losing my 6th Amendment right to
22 effective representation. Accordingly, I assert my
23 federal constitutional rights as guaranteed by the 5th,
24 6th and 14th Amendment to the United States
25 Constitution.

0221

1 Q. Isn't it true, sir, that you flew to Thailand
2 in 2001?

3 MR. PIKE: Form.

4 THE WITNESS: I intend to respond to all
5 relevant questions regarding this lawsuit; however,
6 at the present time, my attorneys have counseled me
7 I cannot provide answers to any questions relevant
8 to this lawsuit. I must accept this advice or risk
9 losing my 6th Amendment right to effective
10 representation. Accordingly, I assert my federal
11 constitutional rights as guaranteed by the 5th, 6th
12 and 14th Amendment to the United States

13 Constitution.

14 BY MR. KUVIN:

15 Q. Is it true that you went to Thailand in 2001
16 with Prince Andrew?

17 MR. PIKE: Form.

18 THE WITNESS: I intend to respond to all
19 relevant questions regarding this lawsuit; however,
20 at the present time, my attorneys have counseled me
21 I cannot provide answers to any questions relevant
22 to this lawsuit, and as I've done for most of all
23 your questions today, Mr. Kuvin, I must accept this
24 advice or risk losing my 6th Amendment right to
25 effective representation. Accordingly, I assert my

0222

1 federal constitutional rights as guaranteed by the
2 5th, 6th and 14th Amendment to the United States
3 Constitution.

4 BY MR. KUVIN:

5 Q. Isn't it true that you went to Thailand in
6 2001 so that you could engage in sexual relations with
7 girls under the age of 16 with Prince Andrew without any
8 fear of any legal recourse?

9 MR. PIKE: Same objection. In addition,
10 improper hypothetical, lack of predicate,
11 foundation, argumentative, harassing.

12 THE WITNESS: I intend to respond to all
13 relevant questions regarding this lawsuit; however,
14 at the present time, my attorneys have counseled me
15 I cannot provide answers to any questions relevant
16 to this lawsuit. I must accept this advice or risk
17 losing my 6th Amendment right to effective
18 representation. Accordingly, I must assert my
19 federal constitutional rights as guaranteed by the
20 5th, 6th and 14th Amendment to the United States
21 Constitution.

22 BY MR. KUVIN:

23 Q. Have you seen the photographs of you and
24 Prince Andrew while you were in Thailand with half naked
25 women, some of which were under the age of 16?

0223

1 MR. PIKE: Same objections.

2 THE WITNESS: I intend --

3 MR. PIKE: Relevance as well, excuse me. I'm
4 sorry.

5 THE WITNESS: I intend to respond to all
6 relevant questions regarding this lawsuit; however,
7 at the present time, my attorneys have counseled me
8 I cannot provide answers to any questions relevant
9 to this lawsuit. I must accept this advice or risk
10 losing my 6th Amendment right to effective
11 representation. Accordingly, I assert my federal
12 constitutional rights as guaranteed by the 5th, 6th
13 and 14th Amendments to the United States
14 Constitution.

15 BY MR. KUVIN:

16 Q. Did you bring any young women on the plane
17 with you when you went to Thailand in 2001?

18 MR. PIKE: Same objection.

19 THE WITNESS: I intend to respond to all
20 relevant questions regarding this lawsuit; however,
21 at the present time, my attorneys have counseled me
22 I cannot provide answers to any questions relevant
23 to this lawsuit. I must accept this advice or risk

24 losing my 6th Amendment right to effective
25 representation. Accordingly, I assert my federal

0224

1 constitutional rights as guaranteed by the 5th, 6th
2 and 14th Amendments to the United States
3 Constitution.

4 BY MR. KUVIN:

5 Q. Have you bragged to people before that you
6 bought -- brought ██████████ to the United States
7 to be your Yugoslavian sex slave?

8 A. I intend to respond to all relevant questions
9 regarding this lawsuit; however, at the present time, my
10 attorneys have counseled me I cannot provide answers to
11 any questions relevant to this lawsuit. I must accept
12 their advice or risk losing my 6th Amendment right to
13 effective representation. Accordingly, I must assert my
14 federal constitutional rights as guaranteed by the 5th,
15 6th and 14th Amendments to the United States
16 Constitution.

17 Q. Have you had --

18 MR. GOLDBERGER: You raised the same objection
19 to that question, right?

20 MR. PIKE: Yeah, I did.

21 BY MR. KUVIN:

22 Q. Have you had sex with numerous girls under the
23 age of 18 in the presence of ██████████?

24 MR. PIKE: Same objections.

25 THE WITNESS: I'm going to answer that the

0225

1 same way I've answered most of your questions here
2 today, Mr. Kuvin, which is, I intend to respond to
3 all relevant questions regarding this lawsuit;
4 however, at the present time, my attorneys have
5 counseled me I cannot provide answers to any
6 questions relevant to the lawsuit. I must accept
7 their advice or risk losing my 6th Amendment right
8 to effective representation. Accordingly, I assert
9 my federal constitutional rights as guaranteed by
10 the 5th, 6th and 14th Amendments to the United
11 States Constitution.

12 BY MR. KUVIN:

13 Q. What is MC2?

14 MR. PIKE: Same objection.

15 THE WITNESS: I don't understand the question.

16 BY MR. KUVIN:

17 Q. MC and then a number 2, what is that?

18 MR. PIKE: Lack of predicate, foundation.

19 THE WITNESS: What is that?

20 MR. PIKE: Irrelevant.

21 BY MR. KUVIN:

22 Q. Do you know what it is?

23 A. No.

24 Q. You've never heard of that before?

25 A. MC2?

0226

1 Q. Yeah. Capital M, capital C, number 2; sound
2 familiar at all?

3 A. No.

4 Q. Okay. Are you part owner in a teen modeling
5 agency?

6 A. No.

7 Q. Do you own any interest in any modeling
8 agencies currently?

9 A. I intend to respond to all relevant questions
10 regarding this lawsuit; however, at the present time, my
11 attorneys have counseled me I cannot provide answers to
12 any questions relevant to this lawsuit. I must accept
13 this advice or risk losing my 6th Amendment right to
14 effective representation. Accordingly, I assert my
15 federal constitutional rights as guaranteed by the 5th,
16 6th and 14th Amendments to the United States
17 Constitution.

18 Q. Do you know what a sexual device called a Twin
19 Torpedo is?

20 MR. PIKE: Same objections, irrelevant as
21 worded.

22 THE WITNESS: Would you like to ask me a bunch
23 of questions or are we going to -- do you want to
24 individual answers to these? Do you want a
25 compound question?

0227

1 BY MR. KUVIN:

2 Q. I can do it that way, it doesn't matter to me.

3 THE WITNESS: It's up to you.

4 MR. KUVIN: It's up to you guys.

5 MR. PIKE: As I've said, Mr. Kuvin, if you
6 want to limit the time that we spend here today and
7 ask a compound question if you're going to list
8 various items or list individuals by name and ask
9 questions, I won't have a compound objection to
10 that type of inquiry if it's in light of attempting
11 to save time.

12 MR. KUVIN: Sure.

13 BY MR. KUVIN:

14 Q. All righty.

15 MR. PIKE: But that's limited to the compound
16 objection.

17 MR. KUVIN: Oh, no, that's fine.

18 BY MR. KUVIN:

19 Q. All right. Did you purchase something called
20 a Twin Torpedo, a soap made in the shape of a penis, and
21 a soap in the shape of a vagina?

22 A. I'm going to answer that question like I've
23 answered most of your questions here today, which is, I
24 intend to respond to all relevant questions regarding
25 this lawsuit; however, at the present time, my attorneys

0228

1 have counseled me that I cannot provide answers to any
2 questions relevant to this lawsuit. I must accept this
3 advice or risk losing my 6th Amendment right to
4 effective representation. Accordingly, I assert my
5 federal constitutional rights as guaranteed by the 5th,
6 6th and 14th Amendment to the United States
7 Constitution.

8 MR. PIKE: Additionally, just for the Court's
9 record, you're questioning the witness on Exhibit
10 No. what?

11 MR. KUVIN: It's not an exhibit. It's the
12 Town of Palm Beach Incident Report with respect to
13 Jeffrey Epstein, of which I gave you a copy before.
14 And that was referencing, just so the record is
15 clear, page 46.

16 MR. PIKE: Then I would add additional
17 privileges and objections in addition to what
18 Mr. Epstein has already raised underneath Florida
19 Rule of Criminal Procedure 3.220 and work product.

20 Not necessarily the document in front of you, but
21 the questions and the answer you're attempting to
22 elicit.

23 BY MR. KUVIN:

24 Q. Whose mobile wireless number is [REDACTED]?

25 A. I intend to respond to all relevant questions

0229

1 regarding this lawsuit; however, at the present time, my
2 attorneys have counseled me I cannot provide answers to
3 any questions relevant to this lawsuit. I must accept
4 this advice or risk losing my 6th Amendment right to
5 effective representation. Accordingly, I hereby assert
6 my federal constitutional rights as guaranteed by the
7 5th, 6th and 14th Amendments to the United States
8 Constitution.

9 Q. I'm going to read you, for speed's sake, three
10 separate phone numbers, and it's the same question for
11 each. Do you recognize the following phone numbers?

12 They all have Area Code [REDACTED]. The first one is [REDACTED],
13 the second is [REDACTED], and the third is [REDACTED].

14 A. I intend to respond to all relevant questions
15 regarding this lawsuit; however, at the present time, my
16 attorneys have counseled me I cannot provide answers to
17 any questions relevant to this lawsuit. I must accept
18 this advice or risk losing my 6th Amendment right to
19 effective representation. Accordingly, I must assert my
20 federal constitutional rights as guaranteed by the 5th,
21 6th and 14th Amendments to the United States
22 Constitution.

23 Q. Did [REDACTED] have the phone number
24 [REDACTED] or [REDACTED] or [REDACTED] -- I'm sorry, same number
25 again. So two numbers: Either [REDACTED] or [REDACTED]?

0230

1 A. I intend to respond to all relevant questions
2 regarding this lawsuit; however, at the present time, my
3 attorneys have counseled me I cannot provide answers to
4 any questions relevant to the lawsuit. I must accept
5 this advice or risk losing my 6th Amendment right to
6 effective representation. Accordingly, I must assert my
7 federal constitutional rights as guaranteed by the 5th,
8 6th and 14th Amendments to the Constitution.

9 Q. Do you have an egg-shaped penis?

10 A. I intend to respond to all relevant questions
11 regarding this lawsuit; however, at the present time, my
12 attorneys have counseled me I cannot provide answers to
13 any questions that may be relevant to this lawsuit. I
14 must accept this advice or risk losing my 6th Amendment
15 right to effective representation. Accordingly, I must
16 assert my federal constitutional rights as guaranteed by
17 the 5th, 6th and 14th Amendment to the United States
18 Constitution.

19 Q. Do you have any identifying marks on your
20 penis?

21 A. I intend to respond to all relevant questions
22 regarding this lawsuit; however, at the present time, my
23 attorneys have counseled me I cannot provide answers to
24 any questions relevant to the lawsuit. I must accept
25 their advice or risk losing my 6th Amendment right to

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1 effective representation. Accordingly, I hereby assert
2 my federal constitutional rights as guaranteed by the
3 5th, 6th and 14th Amendments to the United States
4 Constitution.

5 MR. PIKE: In addition, same objection and
6 privilege which regard to the Florida Rule of
7 Procedure 3.220 and work product. Not necessarily
8 the document you're talking or speaking from, but
9 the testimony.

10 MR. KUVIN: I was just reading this. I wasn't
11 asking questions from this at the moment.

12 BY MR. KUVIN:

13 Q. Does your penis have any deformities?

14 MR. PIKE: Form.

15 THE WITNESS: I intend to respond to all
16 relevant questions regarding this lawsuit; however,
17 at the present time, my attorneys have counseled me
18 I cannot provide answers the any questions relevant
19 to the lawsuit. I must accept this advice or risk
20 losing my 6th Amendment right to effective
21 representation. Accordingly, I assert my federal
22 constitutional rights as guaranteed by the 5th, 6th
23 and 14th Amendment to the Constitution, as I've
24 done with most of your questions here today.

25
0232

1 BY MR. KUVIN:

2 Q. Did you ever utilize Dollar-Rent-a-Car to rent
3 cars while you were here in Palm Beach at any time?

4 A. I intend to respond to all relevant questions,
5 Mr. Kuvin, regarding this lawsuit; however, at the
6 present time, my attorneys have counseled me I cannot
7 provide answers to any questions that may prove relevant
8 to this lawsuit. I must accept this advice or risk
9 losing my 6th Amendment right to effective
10 representation. Accordingly, I must assert my federal
11 constitutional rights as guaranteed by the 5th, 6th and
12 14th Amendment to the United States Constitution.

13 Q. What was your personal cell phone carrier back
14 in 2004?

15 A. I intend to respond to all relevant questions
16 regarding this lawsuit.

17 Q. Let me make this quicker. I'm sorry for
18 interrupting you, I apologize. Let's say, what was your
19 cell phone carrier back from 2004 through 2006.

20 MR. PIKE: And I'm not objecting to compound;
21 however, there are various allegations in your
22 complaint regarding a time frame. So therefore,
23 with regard to the allegations in your complaint,
24 relative to your question, I'm not objecting to the
25 compound, I'm saying it's overbroad.

0233

1 MR. KUVIN: 2004 to 2006?

2 MR. PIKE: Overbroad and irrelevant based upon
3 the allegations that you've alleged.

4 MR. KUVIN: All right. Well, let me clarify
5 the question then.

6 BY MR. KUVIN:

7 Q. What was your cell phone carrier from 2004 to
8 2005?

9 MR. PIKE: Same objections.

10 BY MR. KUVIN:

11 Q. Well, let me try and fix it again. What was
12 your cell phone carrier from 2005 to 2006?

13 MR. PIKE: Relevance.

14 THE WITNESS: I intend to respond to all
15 relevant questions regarding this lawsuit; however,

16 at the present time, my attorneys have counseled me
17 I cannot provide answers to any questions relevant
18 to this lawsuit. I must accept their advice or
19 risk losing my 6th Amendment right to effective
20 representation; therefore, I must assert my federal
21 constitutional rights as guaranteed by the 5th, 6th
22 and 14th Amendments to the United States
23 Constitution.

24 BY MR. KUVIN:

25 Q. What were the cell phone carriers of [REDACTED]
[REDACTED], [REDACTED] or Ghislaine Maxwell from the
2 years 2005 to 2006?

3 MR. PIKE: Relevance.

4 THE WITNESS: I intend to respond to all
5 relevant questions regarding this lawsuit. As I've
6 answered most of your questions the same way today,
7 Mr. Kuvin, at the present time, my attorneys have
8 counseled me I cannot provide answers to any of
9 your questions that may be relevant to this
10 lawsuit. I must accept this advice or risk losing
11 my 6th Amendment right to effective representation.
12 Therefore, accordingly, I assert my federal
13 constitutional rights as guaranteed by the 5th, 6th
14 and 14th Amendment to the United States
15 Constitution.

16 May we take a break, please?

17 MR. KUVIN: Sure.

18 MR. PIKE: Yes.

19 MR. GOLDBERGER: Yes.

20 THE VIDEOGRAPHER: Going off the record at
21 3:21.

22 (A brief recess was taken.)

23 THE VIDEOGRAPHER: We're back on the record at
24 3:30.

25
0235

1 BY MR. KUVIN:

2 Q. Here, let me move this out of the way.

3 A. You can take your Joy Jelly home now.

4 Q. It's actually an exhibit to your deposition.

5 A. Sorry.

6 Q. Have you read the police department's, the
7 Palm Beach Police Department's, probable cause
8 affidavit? Have you ever read it?

9 MR. PIKE: Attorney-client, work privilege.

10 BY MR. KUVIN:

11 Q. Have you ever read the police department, Palm
12 Beach Police Department's incident report regarding you?

13 MR. PIKE: Same objection.

14 MR. GOLDBERGER: Same objection.

15 MR. PIKE: And instruction, I'm sorry.

16 BY MR. KUVIN:

17 Q. Are you circumcised?

18 MR. PIKE: Objection, relevance.

19 THE WITNESS: I intend to respond to all
20 relevant questions regarding this lawsuit; however,
21 at the present time, my attorneys have counseled me
22 I cannot provide answers to any questions relevant
23 to this lawsuit. I must accept this advice or risk
24 losing my 6th Amendment right to effective
25 representation. Accordingly, I assert my federal

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1 constitutional rights as guaranteed by the 5th, 6th
2 and 14th Amendments to the United States
3 Constitution.

4 BY MR. KUVIN:

5 Q. Was a search warrant performed and executed at
6 your home on Palm Beach Island?

7 MR. GOLDBERGER: Attorney-client, work
8 privilege.

9 I'll instruct you not to answer.

10 BY MR. KUVIN:

11 Q. Do you know [REDACTED], spelled [REDACTED],
12 [REDACTED]; Daniel Estes, spelled E-S-T-E-S; or Douglas
13 Schoettle, S-C-H-O-E-T-T-L-E?

14 A. I intend to respond to all relevant questions
15 regarding this lawsuit; however, at the present time, my
16 attorneys have counseled me I cannot provide answers to
17 any questions relevant to this lawsuit. And as I've
18 answered most of your questions today, Mr. Kuvin, I must
19 accept this advice and risk losing -- or risk losing my
20 6th Amendment right to effective representation.

21 Accordingly, I assert my federal constitutional rights
22 as guaranteed by the 5th, 6th and 14th Amendments to the
23 United States Constitution.

24 Q. Did you have a chef working for you at your
25 Palm Beach home back in 2005?

0237

1 A. I intend to respond to all relevant questions
2 regarding this lawsuit; however, at the present time, my
3 attorneys have counseled me I cannot provide answers to
4 any questions relevant to this lawsuit at this time. I
5 must accept their advice or risk losing my 6th Amendment
6 right to effective representation. Accordingly, I must
7 assert my federal constitutional rights as guaranteed by
8 the 5th, 6th and 14th Amendment to the United States
9 Constitution.

10 MR. PIKE: Additionally, predicate and
11 foundation.

12 BY MR. KUVIN:

13 Q. Did you own or do you currently own a 2004
14 black Chevy Suburban, bearing Florida tag X99-EGL?

15 A. I intend to respond to all relevant questions
16 regarding this lawsuit; however, at the present time, my
17 attorneys have counseled me I cannot provide answers to
18 any questions that may be relevant to the lawsuit. I
19 must accept their advice or risk losing my 6th Amendment
20 right to effective representation; therefore, I assert
21 my federal constitutional rights as guaranteed by the
22 5th, 6th and 14th Amendment to the United States
23 Constitution.

24 Q. I think I asked this before, and I apologize
25 if I did, but your date of birth is January 20, 1953,

0238

1 correct?

2 A. You asked that before.
3 Yes, correct.

4 Q. Okay, I'm sorry.
5 Do you own a -- or did you own -- let me
6 clarify.

7 A. Do you want to do compound again?

8 Q. Yeah. Did you or do you currently own a 2005
9 black Cadillac Escalade ESV, bearing Florida license tag
10 Q29-9GT?

11 A. I intend to respond to all relevant questions

12 regarding this lawsuit; however, at the present time, my
13 attorneys have counseled me I cannot provide answers to
14 any questions that may be relevant to the lawsuit. I
15 must accept their advice or risk losing my 6th Amendment
16 right to effective representation. Accordingly, I
17 assert my federal constitutional rights as guaranteed by
18 the 5th, 6th and 14th Amendment to the United States
19 Constitution.

20 Q. Have you hired attorneys for either
21 [REDACTED], Ghislaine Maxwell, [REDACTED] or any
22 other --

23 MR. GOLDBERGER: Attorney-client, work
24 product.

25 Are you done? I'm sorry.

0239

1 BY MR. KUVIN:

2 Q. -- or any other women in this case?

3 MR. GOLDBERGER: Okay. Now attorney-client,
4 work product.

5 I direct you not to answer.

6 BY MR. KUVIN:

7 Q. Do you know the name of the girl that was with
8 [REDACTED]. when she was brought to your home?

9 MR. PIKE: Form, lack of predicate,
10 foundation.

11 THE WITNESS: Like I've done to many of your
12 other questions and responded to many of your other
13 questions today, Mr. Kuvin, that question -- I must
14 answer that, I intend to answer all relevant
15 questions regarding this lawsuit; however, at the
16 present time, my attorneys have counseled me I
17 cannot provide answers to any questions that may be
18 relevant. I must accept this advice or risk losing
19 my 6th Amendment right to effective representation;
20 therefore, I assert my federal constitutional
21 rights as guaranteed by the 5th, 6th and 14th
22 Amendment to the Constitution.

23 BY MR. KUVIN:

24 Q. Did you, in fact, give [REDACTED]. \$200 for a -- for
25 her to get naked and give you a massage while you were

0240

1 naked and, in addition, touch her in her vagina without
2 her permission in 2005?

3 MR. PIKE: Predicate, foundation --

4 THE WITNESS: I believe that's been asked and
5 answered.

6 MR. PIKE: Harassing. And I believe as
7 worded, that question has been asked and answered
8 in sub parts. I believe you've asked those
9 questions initially at the beginning of this
10 deposition. The same objections would, therefore,
11 apply and be incorporated.

12 MR. KUVIN: I disagree, but...

13 THE WITNESS: Like most of your other
14 questions here today, I intend to respond to all
15 relevant questions regarding this lawsuit; however,
16 at the present time, my attorneys have counseled me
17 I cannot provide answers to any questions that may
18 be relevant. I must accept this advice or risk
19 losing my 6th Amendment privilege. Accordingly, I
20 assert my federal constitutional rights as
21 guaranteed by the 5th, 6th and 14th Amendment to
22 the US Constitution.

23 BY MR. KUVIN:
24 Q. Do you agree, sir, that your conduct, with
25 respect to [REDACTED], caused her severe emotional distress?

0241
1 MR. PIKE: Same objection. In addition, it's
2 argumentative, harassing and calls for a
3 conclusion.

4 THE WITNESS: I'm going to have to answer that
5 the same way I've answered most of your questions
6 today, Mr. Kuvin, which is, I intend to respond to
7 all relevant questions regarding this lawsuit;
8 however, at the present time, my attorneys have
9 counseled me I cannot provide answers to any
10 questions relevant to the lawsuit. I must accept
11 this advice or risk losing my 6th Amendment right
12 to effective representation. Accordingly, I must
13 assert my federal constitutional rights as
14 guaranteed by the 5th, 6th and 14th Amendment.

15 BY MR. KUVIN:
16 Q. Do you have gray chest hair?

17 A. I intend to respond to all relevant questions
18 regarding this lawsuit; however, at the present time, my
19 attorneys have counseled me I cannot provide answers to
20 any of those questions that may be relevant. I must
21 accept this advice or risk losing my 6th Amendment right
22 to effective representation. Accordingly, I assert my
23 federal constitutional rights as guaranteed by the 5th,
24 6th and 14th Amendments to the United States
25 Constitution.

0242
1 Q. Have you told young ladies -- girls under the
2 age of 18, when they came to your house and got naked to
3 give you a massage, quote, the more you do, the more you
4 get paid?

5 MR. PIKE: Objection, form, predicate,
6 foundation, improper hypothetical and assumes facts
7 not in evidence, relevance.

8 THE WITNESS: Like most of your questions,
9 Mr. Kuvin, today, I intend to respond to all
10 relevant questions regarding this lawsuit; however,
11 at the present time, my attorneys have counseled me
12 I cannot provide answers to any questions relevant
13 to this lawsuit. I must accept this advice or risk
14 losing my 6th Amendment right to effective
15 representation. Accordingly, I assert my federal
16 constitutional rights as guaranteed by the 5th, 6th
17 and 14th Amendment to the United States
18 Constitution.

19 BY MR. KUVIN:
20 Q. Do you have any tattoos?

21 A. I intend to respond to all relevant questions
22 regarding this lawsuit; however, at the present time, my
23 attorneys have counseled me I cannot provide answers to
24 any questions relevant to this lawsuit. I must accept
25 this advice or risk losing my 6th Amendment right to

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1 effective representation. Accordingly, I must assert my
2 federal constitutional rights as guaranteed by the 5th,
3 6th and 14th Amendments to the United States
4 Constitution.

5 Q. Do you have a steam room in your home on Palm
6 Beach Island?

7 MR. PIKE: Same objections.

8 THE WITNESS: I'm going to answer that
9 question the same way I've answered most of your
10 questions here today, which is, I intend to respond
11 to all relevant questions regarding this lawsuit;
12 however, at the present time, my attorneys have
13 counseled me that I cannot provide answers to any
14 questions relevant to the lawsuit. I must accept
15 this advice or risk losing my 6th Amendment right
16 to effective representation. Accordingly, I must
17 assert my constitutional rights as guaranteed by
18 the 5th -- 5th, 6th and 14th Amendments to the
19 United States Constitution.

20 BY MR. KUVIN:

21 Q. Did you provide payments to underaged girls by
22 utilizing cash and wire transfers through Western Union
23 in 2004 or 2005?

24 MR. PIKE: Same objections as raised to the
25 previous last three questions incorporated here.

0244

1 THE WITNESS: I intend to respond to all
2 relevant questions regarding this lawsuit; however,
3 at the present time, my attorneys have counseled me
4 I cannot provide answers to any questions relevant
5 to the lawsuit. I must accept this advice or risk
6 losing my 6th Amendment right to effective
7 representation. Accordingly, I assert my federal
8 constitutional rights as guaranteed by the 5th, 6th
9 and 14th Amendment to the United States
10 Constitution.

11 BY MR. KUVIN:

12 Q. Did you -- excuse me. Did you take any
13 videotapes of girls that were under the age of 18 in
14 your home on Palm Beach Island?

15 MR. PIKE: Same objections incorporated.

16 THE WITNESS: As I have with most of your
17 questions today, I'm going to have to answer that,
18 I intend to respond to all relevant questions
19 regarding this lawsuit; however, at the present
20 time, my attorneys have counseled me I cannot
21 provide answers to any questions that may be
22 relevant to this lawsuit. I must accept this
23 advice or risk losing my 6th Amendment right to
24 effective representation. Accordingly, I assert my
25 federal constitutional rights as guaranteed by the

0245

1 5th, 6th and 14th Amendment to the United States
2 Constitution.

3 BY MR. KUVIN:

4 Q. Have you ever provided a dozen roses to a
5 young girl under the age of 18 who came to your house to
6 give you a massage?

7 MR. PIKE: Form, vague, ambiguous, assumes
8 facts not in evidence.

9 THE WITNESS: I intend to respond to all
10 relevant questions regarding this lawsuit; however,
11 at the present time, my attorneys have counseled me
12 that I cannot provide answers to any questions that
13 may be relevant. I must accept their advice or
14 risk losing my 6th Amendment right to effective
15 representation. Accordingly, I must assert my
16 federal constitutional rights as guaranteed by the
17 5th, 6th and 14th Amendment.

18 BY MR. KUVIN:

19 Q. Did you ever instruct anyone to deliver a
20 bucket of roses after a high school drama performance to
21 an underage girl?

22 MR. PIKE: Same objection. In addition, lacks
23 predicate and foundation. It's overbroad as well.

24 THE WITNESS: I fully intend to respond to all
25 relevant questions regarding this lawsuit; however,

0246

1 at the present time, my attorneys have counseled me
2 that I cannot provide answers to any questions
3 relevant to the lawsuit. I must accept their
4 advice or risk losing my 6th Amendment right to
5 effective representation. Accordingly, I assert my
6 federal constitutional rights as guaranteed by the
7 5th, 6th and 14th Amendment to the United States
8 Constitution.

9 BY MR. KUVIN:

10 Q. Hold on a second. I may be done.

11 Do you know a Dr. Kaku, K-A-K-U?

12 A. I intend to respond to all relevant questions
13 regarding this lawsuit; however, at the present time, my
14 attorneys have counseled me I cannot provide answers to
15 any questions that may be relevant. I must accept this
16 advice or risk losing my 6th right to effective
17 representation. Accordingly, I assert my federal
18 constitutional rights as guaranteed by the 5th, 6th and
19 14th Amendment to the United States Constitution.

20 MR. PIKE: Can you hold on one second?

21 MR. KUVIN: I'm almost done.

22 MR. PIKE: No, no. We're not going anywhere.

23 MR. KUVIN: Okay.

24 MR. PIKE: Okay.

25

0247

1 MR. KUVIN: Okay. All right, I appreciate
2 your patience. That's all the questions that I
3 have right now. I know that Mr. Goldberger needs
4 to deal with an issue right now with Ms. Ezell
5 regarding any further questions.

6 MR. GOLDBERGER: I think we clarified that.

7 Ms. Ezell, are you there?

8 MS. EZELL: I'm here.

9 MR. GOLDBERGER: Yeah. You had a discussion
10 with Bob Critton already concerning the question
11 you raised with me earlier, right?

12 MS. EZELL: Yes, I did, and I don't have any
13 questions.

14 MR. PIKE: Ms. Ezell, this is Michael Pike. I
15 don't know what your conversation was with Bob, but
16 did you cross notice this deposition?

17 MS. EZELL: No, I did not.

18 MR. PIKE: So what is your purpose of being
19 here?

20 My position is that these are closed
21 proceedings and your client, your client did not
22 cross notice this deposition and/or your clients.
23 So what is your purpose of sitting in on this
24 deposition?

25 MS. EZELL: Well, I received a notice of it,

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1 and I just thought I would listen to it while I was
2 doing some other work. And I don't know why it
3 would be a closed proceeding.

4 MR. PIKE: Discovery proceedings are closed if
5 it's a pre-trial discovery, ma'am, it's not a court
6 proceeding.
7 Nonetheless, do you have any questions for the
8 witness?
9 MS. EZELL: No, I don't.
10 MR. PIKE: And Ms. Holmes, who are you here on
11 behalf of? Which clients?
12 MS. HOLMES: [REDACTED] and [REDACTED].
13 MR. PIKE: Are you also here on behalf of Jane
14 Doe in the case 80893?
15 MS. HOLMES: I believe so, yes.
16 MR. PIKE: Do you have any questions for the
17 witness?
18 MS. HOLMES: No, I do not.
19 MR. GOLDBERGER: Katherine, we're going to
20 end. Do you want me to disconnect you now?
21 MS. EZELL: Yes, thanks.
22 MR. GOLDBERGER: Okay.
23 THE VIDEOGRAPHER: Conclude the deposition and
24 go off the record at 3:00 --
25 MR. PIKE: Wait one second.

0249
1 MR. KUVIN: Oh, wait.
2 MR. GOLDBERGER: He's just going to read.
3 MR. PIKE: You didn't give the witness a
4 chance to read or waive and he'll read.
5 THE VIDEOGRAPHER: Conclude the deposition and
6 go off the record at 3:48. This will be the end of
7 tape No. 3.

8
9 (Witness excused.)
10 (Deposition was concluded.)
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0250
1 CERTIFICATE OF OATH
2 THE STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5

6 I, the undersigned authority, certify that
7 JEFFREY EPSTEIN personally appeared before me and was
8 duly sworn on the 8th day of October, 2009.
9

10 Dated this 8th day of October, 2009.
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0251

Jeana Ricciuti, RPR, FPR, CLR
Notary Public - State of Florida
My Commission Expires: 2/17/2013
My Commission No.: DD 854778

1 C E R T I F I C A T E
2 THE STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4

5 I, Jeana Ricciuti, Registered Professional
6 Reporter and Notary Public in and for the State of
7 Florida at large, do hereby certify that I was
8 authorized to and did report said deposition in
9 stenotype; and that the foregoing pages are a true and
10 correct transcription of my shorthand notes of said
11 deposition.

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

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

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

25 Dated this 8th day of October, 2009.

Jeana Ricciuti, RPR, FPR, CLR

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0252

1 DATE: October 22, 2009
2 TO: JEFFREY EPSTEIN
3 c/o Michael J. Pike
4 BURMAN, CRITTON, LUTTIER & COLEMAN, P.A.
5 303 Banyan Boulevard
6 Suite 400
West Palm Beach, Florida 33401

IN RE: █████. v. EPSTEIN

Please take notice that on Thursday, the 8th

7 of October, 2009, you gave your deposition in the
8 above-referred matter. At that time, you did not waive
signature. It is now necessary that you sign your
deposition.

9 As previously agreed to, the transcript will
10 be furnished to you through your counsel. Please read
the following instructions carefully:

11 At the end of the transcript you will find an
errata sheet. As you read your deposition, any changes
12 or corrections that you wish to make should be noted on
the errata sheet, citing page and line number of said
13 change. DO NOT write on the transcript itself. Once
you have read the transcript and noted any changes, be
14 sure to sign and date the errata sheet and return these
pages to me.

15 If you do not read and sign the deposition
within a reasonable time (i.e., 30 days unless otherwise
16 directed) the original, which has already been forwarded
to the ordering attorney, may be filed with the Clerk of
17 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.

18
19 Very truly yours,

20
21 _____
Jeana Ricciuti, RPR, FPR, CLR
22 Prose Court Reporting Agency, INC.
250 S. Australian Avenue, Ste 1500
23 West Palm Beach, Florida 33401

24 I do hereby waive my signature.

25 _____
JEFFREY EPSTEIN

0253
1 C E R T I F I C A T E
2 - - -

3 THE STATE OF FLORIDA
4 COUNTY OF PALM BEACH

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

11
12 Dated this ____ day of _____,
13 2009.

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18 _____
19 JEFFREY EPSTEIN

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0254
1 E R R A T A S H E E T
2 IN RE: [REDACTED] v. EPSTEIN CR: JEANA RICCIUTI

3 DEPOSITION OF: JEFFREY EPSTEIN
4 TAKEN: October 8, 2009
5 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
6 PAGE # LINE # CHANGE REASON

7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____

16
17 Please forward the original signed errata sheet to this
18 office so that copies may be distributed to all parties.

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

21 DATE: _____

22
23 SIGNATURE OF DEPONENT: _____
24
25