

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendants.

Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,
08-80994, 08-80811, 08-80893, 09-80469,
09-8-591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF [REDACTED]
TAKEN ON BEHALF OF THE PLAINTIFF

DATE: April 13, 2010

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2

1 April 13, 2010

2 INDEX

3 WITNESS DIRECT CROSS REDIRECT RECROSS

4 [REDACTED]

5 BY MR. EDWARDS 5 98

6 BY MR. HOROWITZ 65

7 BY MR. LANGINO 77

8 BY MS. EZELL 81

9

10 EXHIBITS

11 PLAINTIFFS

12 FOR IDENTIFICATION PAGE

13 1 Message dated August 21, 2005. 45

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4

1 APPEARANCES (CONTINUED)

2 LEOPOLD-KUVIN

3 Attorneys for Plaintiffs

4 [REDACTED]

5 BY: ADAM J. LANGINO, ESQ.

6

7

8 PODHURST, ORSECK

9 Attorneys for Jane Does 1 and 3

10 City National Bank Building, Suite 88

11 [REDACTED]

12 BY: KATHERINE W. EZELL, ESQ.

13

14 BURMAN, CRITTON, LUTTIER & COLEMAN, LLP

15 Attorneys for Defendant Jeffrey Epstein

16 [REDACTED]

17 BY: DAVID YAREMA, ESQ.

18 ROBERT CRITTON, ESQ.

19

20 ATTERBURY, GOLDBERGER & WEISS

21 Co-Counsel for Defendants

22 [REDACTED]

23 BY: JACK A. GOLDBERGER, ESQ.

24

25 ALSO PRESENT:

JESSICA CADWELL

JOE ROVNER, Videographer

(U.S. Legal)

3

1 The videotaped deposition of [REDACTED]

2 [REDACTED] in the above-entitled and numbered

3 cause, was taken before me, TERRI BECKER, a

4 Registered Professional Reporter and Notary

5 Public for the State of Florida at Large, at 444

6 West Railroad Avenue, in the City of West Palm

7 Beach, Palm Beach County, in the State of

8 Florida, beginning at the hour of 10:00 o'clock

9 a.m., pursuant to the Notice in said cause for

10 the taking of said deposition which is annexed to

11 the court file herein, on behalf of the PLAINTIFF

12 in the above-entitled action pending in the

13 above-named court.

14 The appearances at said time and place

15 were as follows:

16 FARMER, JAFFE, WEISSING, EDWARDS,

17 FISTOS & LEHRMAN, PL

18 Attorneys for Plaintiffs Jane Does,

19 [REDACTED]

20 and [REDACTED]

21 [REDACTED]

22 BY: BRADLEY J. EDWARDS, ESQ.

23

24 MERMELSTEIN & HOROWITZ, P.A.

25 Attorneys for Plaintiffs Jane Does,

numbers 2 through 8

[REDACTED]

BY: ADAM D. HOROWITZ, ESQ.

5

1 THEREUPON,

2 [REDACTED]

3 being by Terri Becker first duly sworn to tell

4 the whole truth, as hereinafter certified,

5 testified as follows:

6 DIRECT EXAMINATION

7 BY MR. EDWARDS:

8 Q Can you tell us your name.

9 A [REDACTED]

10 Q What is your date of birth?

11 A [REDACTED]

12 Q What is your Social Security number?

13 A Under advice of my counsel, I invoke my

14 privileges under the Fifth and Sixth Amendments

15 to the United States Constitution and

16 respectfully decline to answer the question.

17 Q Where were you born?

18 A I'm sorry, though I would like to answer

19 your question, I must invoke my Fifth and Sixth

20 Amendment privileges and refuse to answer your

21 questions.

22 Q What is your current address?

23 MR. GOLDBERGER: There is going to be a

24 continued, obviously, you anticipate I'm

25 sure, continued invocation of Fifth

2 (Pages 2 to 5)

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6	<p>1 Amendment privileges. If it is okay with 2 all counsel, to shorten things, I'll simply 3 have the witness say "Fifth," if that 4 satisfies everyone's interest. 5 MR. EDWARDS: That is fine with me. 6 MR. GOLDBERGER: Okay, with that Cathy? 7 MS. EZELL: Yes. 8 MR. HOROWITZ: Yes. 9 Q I'll reask the question, what's your 10 current address? 11 A Fifth. 12 Q Are you currently living at 358 El 13 Brillo Way with a man named Jeffrey Epstein? 14 A The Fifth. 15 Q Are you also familiar with an address in 16 New York, 301 East 66th Street? 17 A The Fifth. 18 Q When Mr. Epstein was incarcerated in 19 jail, you went to visit him on numerous 20 occasions; is that correct? 21 MR. YAREMA: Objection. 22 A The Fifth. 23 Q When you went to visit him you indicated 24 to jail personnel your address was 301 East 66th 25 Street, apartment 8-D in New York City, New York;</p>	8	<p>1 A The Fifth. 2 Q Do you know a lady by the name of 3 Maritsa Vazques? 4 A The Fifth. 5 Q Is this somebody who helped to falsify a 6 visa for you? 7 MR. YAREMA: Object to the form. 8 A The Fifth. 9 Q Do you know Evelyn Velasaques? 10 A The Fifth. 11 Q Were you ever a working model in the 12 United States? 13 A The Fifth. 14 Q Can you tell us your parents' names? 15 A The Fifth. 16 Q How is it that you have supported 17 yourself financially, since you have been in this 18 country? 19 MR. YAREMA: Object to the form. 20 A The Fifth. 21 Q Have you supported yourself financially? 22 A The Fifth. 23 Q What is the last grade you completed in 24 school? 25 A The Fifth, I take the Fifth Amendment.</p>
7	<p>1 is that correct? 2 MR. YAREMA: Objection. 3 A Fifth. 4 Q Isn't it true when Mr. Epstein was in 5 jail, you visited him on more than 50 occasions? 6 MR. YAREMA: Form objection. 7 Q True? 8 A The Fifth. 9 Q How long have you been in the United 10 States, [REDACTED]? 11 A The Fifth. 12 Q Who brought you to the United States? 13 MR. YAREMA: Form objection. 14 A The Fifth. 15 Q What is your current status in this 16 country? 17 A The Fifth. 18 MR. YAREMA: Form objection. 19 MR. GOLDBERGER: Let me take a half a 20 second. 21 (Witness and her counsel confer.) 22 Q Are you a U.S. citizen? 23 A The Fifth. 24 Q What type of visa are you here on? 25 MR. YAREMA: Form objection.</p>	9	<p>1 Q Are you in school now? 2 A The Fifth. 3 Q Have you ever attended any school in the 4 United States? 5 A The Fifth. 6 Q Have you ever been employed since 7 residing in the United States? 8 A The Fifth. 9 Q Is Jeffrey Epstein your sole means of 10 financial support today? 11 MR. YAREMA: Object to the form. 12 A The Fifth. 13 Q Since coming to this country, hasn't 14 Jeffrey Epstein always been your sole means of 15 financial support? 16 MR. YAREMA: Object to the form. 17 A The Fifth. 18 Q How much does Jeffrey Epstein pay you 19 today? 20 MR. YAREMA: Object to the form. 21 A The Fifth. 22 Q What does every Epstein pay you for? 23 MR. YAREMA: Object to the form. 24 A The Fifth. 25 Q Does he pay you specifically to be his</p>

3 (Pages 6 to 9)

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1 sex slave?
2 MR. YAREMA: Object to the form.
3 A The Fifth.
4 Q Are you aware that the reports about you
5 indicate that you were brought to the United
6 States by Jeffrey Epstein when you were roughly
7 13 or 14 years old to be his [REDACTED] lesbian
8 sex slave?
9 MR. YAREMA: Object to the form.
10 A The Fifth.
11 Q Is that true?
12 MR. YAREMA: Object to the form.
13 A The Fifth.
14 Q Have you performed any services for
15 Jeffrey Epstein aside from being his sex slave?
16 MR. YAREMA: Object to the form.
17 A The Fifth.
18 Q What is your sexual orientation?
19 MR. YAREMA: Object to the form.
20 MR. GOLDBERGER: I'm going to instruct
21 the witness not to answer that question. It
22 serves no purpose other than to harass or
23 intimidate her, so in addition to Fifth
24 Amendment privileges, I'm objecting on
25 privacy grounds.

11
1 A I take the Fifth.
2 Q I represent a lady named, a young female
3 named [REDACTED]; you know who that is, right?
4 MR. YAREMA: Object to the form.
5 A The Fifth.
6 Q Jeffrey Epstein made you have sex with
7 [REDACTED], didn't he?
8 MR. YAREMA: Object to the form.
9 A The Fifth.
10 Q You did, in fact, engage in sexual
11 activity with [REDACTED] when she was only 16 years
12 old; isn't that true?
13 MR. YAREMA: Object to the form.
14 A The Fifth.
15 Q Back to my original question: And I'll
16 ask you this way: Do you consider yourself
17 heterosexual, bi-sexual, or can you answer that
18 question?
19 MR. YAREMA: Object to the form.
20 MR. GOLDBERGER: Same objection. Do not
21 answer the question.
22 A Fifth.
23 Q How did you meet Jeffrey Epstein?
24 A Fifth.
25 Q When did you become one of Jeffrey

12
1 Epstein's sex slaves?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q What does it mean to be Jeffrey
5 Epstein's sex slave?
6 MR. YAREMA: Object to the form.
7 A Fifth.
8 Q Are you aware that Jeffrey Epstein reads
9 books on how to be a proper master to his sex
10 slave?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q What has Jeffrey Epstein done to train
14 you to be his sex slave?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q What do your parents think about you
18 being Jeffrey Epstein's sex slave?
19 MR. YAREMA: Object to the form.
20 A Fifth.
21 Q When did you first learn that Jeffrey
22 Epstein had a sexual obsession for underage minor
23 females?
24 MR. YAREMA: Object to the form.
25 A Fifth.

13
1 Q How many times has Jeffrey Epstein made
2 you have sex with underage minor females?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q Do you enjoy sex with underage minor
6 females?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q What is the youngest child that Jeffrey
10 Epstein has forced you to have sex with?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q Does Jeffrey Epstein today still make
14 you have sex with underage minor females?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q How many underage minor females has
18 Jeffrey Epstein made you have sex with, since you
19 were over the age of 18?
20 MR. YAREMA: Object to the form.
21 A The Fifth.
22 Q Prior to turning 18, is it true that
23 Jeffrey Epstein made you have sex with many other
24 children in kid-type orgies?
25 MR. YAREMA: Object to the form.

4 (Pages 10 to 13)

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14	<p>1 A Fifth.</p> <p>2 Q Has Jeffrey Epstein also made you</p> <p>3 perform sexually on his friends?</p> <p>4 MR. YAREMA: Object to the form.</p> <p>5 A Fifth.</p> <p>6 Q Do you know David Copperfield?</p> <p>7 MR. YAREMA: Object to the form.</p> <p>8 A Fifth.</p> <p>9 Q Have you ever been made to perform</p> <p>10 sexually on David Copperfield?</p> <p>11 MR. YAREMA: Object to the form.</p> <p>12 A Fifth.</p> <p>13 Q Do you know Prince Andrew?</p> <p>14 A Fifth.</p> <p>15 Q Have you ever been made to perform</p> <p>16 sexually on Prince Andrew?</p> <p>17 MR. YAREMA: Object to the form.</p> <p>18 A Fifth.</p> <p>19 Q When was the first time that you knew</p> <p>20 Jeffrey Epstein molested underage girls?</p> <p>21 MR. YAREMA: Object to the form.</p> <p>22 A Fifth.</p> <p>23 Q Did Jeffrey Epstein molest you when you</p> <p>24 were underage?</p> <p>25 MR. YAREMA: Object to the form.</p>	16	<p>1 A Fifth.</p> <p>2 Q Have you read the nonprosecution</p> <p>3 agreement between the government and Jeffrey</p> <p>4 Epstein?</p> <p>5 A Fifth.</p> <p>6 Q Are you aware that inside that document</p> <p>7 you are labeled as a co-conspirator of his crimes</p> <p>8 against children?</p> <p>9 MR. YAREMA: Object to the form.</p> <p>10 A Fifth.</p> <p>11 Q Isn't it true that your role was to lure</p> <p>12 or procure underage minor females to Jeffrey</p> <p>13 Epstein for him to molest, correct?</p> <p>14 MR. YAREMA: Object to the form.</p> <p>15 A Fifth.</p> <p>16 Q You also scheduled appointments for</p> <p>17 Jeffrey Epstein, so there would be designated</p> <p>18 times for Jeffrey Epstein to molest underage</p> <p>19 minor females, correct?</p> <p>20 MR. YAREMA: Object to the form.</p> <p>21 A The Fifth.</p> <p>22 Q As well, you participated in various sex</p> <p>23 acts with underage minor females, thus molesting</p> <p>24 them yourself; is that correct?</p> <p>25 MR. YAREMA: Object to the form.</p>
15	<p>1 A Fifth.</p> <p>2 Q I'm assuming you understand why you're</p> <p>3 here today, correct?</p> <p>4 MR. YAREMA: Object to the form.</p> <p>5 A The Fifth.</p> <p>6 Q For allegations related to Jeffrey</p> <p>7 Epstein interacting sexually with numerous</p> <p>8 underage minor females; that's something you</p> <p>9 know, right?</p> <p>10 MR. YAREMA: Object to the form.</p> <p>11 A The Fifth.</p> <p>12 Q That's something in addition to the</p> <p>13 civil lawsuits, there were criminal cases</p> <p>14 involving the same conduct, correct?</p> <p>15 MR. YAREMA: Object to the form.</p> <p>16 A Fifth.</p> <p>17 Q You were a part of that criminal</p> <p>18 investigation, in fact, you were a co-conspirator</p> <p>19 of Jeffrey Epstein's; is that right?</p> <p>20 MR. YAREMA: Object to the form.</p> <p>21 A Fifth.</p> <p>22 Q What crimes did you conspire to commit</p> <p>23 with Jeffrey Epstein against underage minor</p> <p>24 females?</p> <p>25 MR. YAREMA: Object to the form.</p>	17	<p>1 A Fifth.</p> <p>2 Q Do you understand that Jeffrey Epstein's</p> <p>3 interaction with underage minor females is</p> <p>4 illegal? Do you understand that?</p> <p>5 MR. YAREMA: Object to the form.</p> <p>6 A The Fifth.</p> <p>7 Q Do you understand that the Lewd and</p> <p>8 Lascivious Molestation Statute in Florida</p> <p>9 indicates a person who intentionally touches in a</p> <p>10 lewd or lascivious manner, the breasts, genital</p> <p>11 area or buttocks, or the clothing covering them,</p> <p>12 of a person less than 16 years of age, or forces</p> <p>13 or entices a person under 16 years of age, to so</p> <p>14 touch the perpetrator, commits lewd or lascivious</p> <p>15 molestation? Are you aware of that statute?</p> <p>16 A Fifth.</p> <p>17 Q That is a statute that you know Jeffrey</p> <p>18 Epstein to have violated; is that true?</p> <p>19 MR. YAREMA: Object to the form.</p> <p>20 A The Fifth.</p> <p>21 Q That's a statute that you yourself have</p> <p>22 violated; is that true?</p> <p>23 MR. YAREMA: Object to the form.</p> <p>24 A The Fifth.</p> <p>25 Q You've observed Jeffrey Epstein violate</p>

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1 that statute on many underage minor females,
2 true?
3 MR. YAREMA: Object to the form.
4 A The Fifth.
5 Q Have you ever discussed with Jeffrey
6 Epstein that the fact that he is a child
7 molester?
8 MR. YAREMA: Object to the form.
9 A Fifth.
10 Q Have you asked Jeffrey Epstein why he
11 has made you interact with underage minor females
12 in a sexual manner?
13 MR. YAREMA: Object to the form.
14 A Fifth.
15 Q During the litigation of these civil
16 cases, has Jeffrey Epstein indicated to you an
17 intent to continue to molest children?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q Is it your intent to continue to commit
21 sex crimes against minors?
22 MR. YAREMA: Object to the form.
23 A Fifth.
24 Q In addition to your being named as a
25 co-conspirator of Jeffrey Epstein regarding his

19

1 crimes against minors, there is also a person
2 named [REDACTED] listed as a co-conspirator.
3 Do you know [REDACTED]?
4 A Fifth.
5 Q This is somebody who lives with you and
6 Jeffrey Epstein; is that true?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q And [REDACTED] is somebody who you
10 know to be [REDACTED] girlfriend; is that
11 true?
12 MR. YAREMA: Object to the form.
13 A Fifth.
14 Q She's spoken with [REDACTED] about
15 this case on numerous occasions; is that true?
16 MR. YAREMA: Object to the form.
17 A Fifth.
18 Q [REDACTED] conversations with [REDACTED]
19 [REDACTED] and your observations of them, you believe
20 would implicate you in a crime and that's why
21 you're able to take the Fifth as to that
22 question?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Who is Lesley Groff, also listed as a

20

1 co-conspirator in the non-prosecution agreement
2 related to Jeffrey Epstein's crimes against
3 minors?
4 MR. YAREMA: Object to the form.
5 A Fifth.
6 Q Do you know [REDACTED] or [REDACTED]
7 [REDACTED]?
8 A Fifth.
9 Q These are all people who also
10 participated in Jeffrey Epstein's scheme to lure
11 underage females to him for sex; is that true?
12 MR. YAREMA: Object to the form.
13 A Fifth.
14 Q You and these other co-conspirators
15 played various roles to make sure Jeffrey Epstein
16 was able to engage in sexual contact or conduct,
17 with underage minor females on an everyday basis;
18 is that true?
19 MR. YAREMA: Object to the form.
20 A Fifth.
21 Q Since the time you first met Jeffrey
22 Epstein, has his appetite for underage minor
23 females always been the same?
24 MR. YAREMA: Object to the form.
25 A Fifth.

21

1 Q By that I mean, have you observed
2 Jeffrey Epstein to interact sexually with
3 underage minor females literally on a daily
4 basis?
5 MR. YAREMA: Object to the form.
6 A Fifth.
7 Q Wasn't it one of your specific job
8 duties to make sure that he had different
9 underage minor females to molest on a daily
10 basis?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q In addition to the improper sexual
14 contact between Jeffrey Epstein and underage
15 minor females at the West Palm Beach house, you
16 have observed similar improper and illegal
17 contact by Jeffrey Epstein in his New York
18 mansion, as well, correct?
19 MR. YAREMA: Object to the form.
20 A Fifth.
21 Q In fact, he operates a very similar
22 scheme up there, in that he schedules these
23 appointments with underage minor females, under
24 the guise that it is going to be a massage; is
25 that correct?

22

1 MR. YAREMA: Object to the form?
2 A Fifth.
3 Q When he is in New York, he has contact
4 with underage minor females for the purposes of
5 sexually molesting them as well; is that
6 correct?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q When he is in his ranch in New Mexico,
10 similarly, Jeffrey Epstein is engaging in sex
11 with underage minor females from that local area
12 as well, and that's something you've observed?
13 MR. YAREMA: Object to the form.
14 A Fifth.
15 Q On his island, particularly, he has
16 flown underage minor females to the island for
17 underage kid-type orgies; is that true?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q You're shaking your head indicating, at
21 least to me, indicating that you may not agree
22 with what I'm saying, and I would love to give
23 you the chance to explain it to us.
24 MR. GOLDBERGER: I appreciate that, but
25 don't --

23

1 MR. EDWARDS: Read too much into it?
2 MR. GOLDBERGER: Exactly. Don't go
3 there. Just ask the questions and we will
4 move right along.
5 MR. EDWARDS: I agree, Jack, I just know
6 if this is played for a jury, I don't want
7 the jury to interpret her shaking her head
8 as a "No," and then her pleading the Fifth.
9 MR. GOLDBERGER: I appreciate that.
10 Don't take anything as to any head movements
11 or any body movements at all. Just ask the
12 questions and we will let the video speak
13 for itself.
14 Q How many of these -- you know what an
15 orgy is, don't you?
16 A Fifth.
17 Q And how many of these orgies, as I'm
18 calling them, where there are numerous underage
19 minors having sex with each other and with
20 Jeffrey Epstein, have you observed on Jeffrey
21 Epstein's island?
22 MR. YAREMA: Object to the form.
23 A Fifth.
24 Q Is part of your role as Jeffrey
25 Epstein's sex slave, to not tell the authorities

24

1 when Jeffrey Epstein commits these crimes against
2 children?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q Is there any way for you to escape being
6 his sex slave?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q Have you ever wanted to cooperate with
10 the authorities, so that you could escape being
11 his sex slave?
12 MR. YAREMA: Object to the form.
13 A Fifth.
14 Q Do you represent to others that you are
15 his girlfriend or his sex slave, or some other
16 designation?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q Isn't it true that you recently
20 represented to the Probation Officer that you
21 were his live-in girlfriend?
22 MR. YAREMA: Object to the form.
23 A Fifth.
24 Q When Probation calls the house, are you
25 told to tell Probation that he is in the swimming

25

1 pool or doing some other activity that would not
2 allow him to come to the telephone?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q Isn't it true you're under strict orders
6 to tell Probation that?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q Isn't it true you've heard Jeffrey
10 Epstein tell you on numerous occasions, regarding
11 the age of the girls that he wants to his house,
12 for the purposes of sexually molesting, the
13 phrase he uses is "the younger the better,"
14 true?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q I asked you earlier about [REDACTED] out of
18 turn as a result of an objection related to your
19 sexual orientation, but I'll talk specifically
20 about [REDACTED] right now. You know who that is,
21 right?
22 MR. YAREMA: Object to the form.
23 A Fifth.
24 Q That is somebody you observed Jeffrey
25 Epstein to call for the purposes of getting her

7 (Pages 22 to 25)

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1 to his house to sexually molest; is that right?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q The first time she went to Jeffrey
5 Epstein's house was in 2002 when she was only 14
6 years old; is that true?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q In fact in 2002 you were only 18 years
10 old or so yourself; is that right?
11 A Fifth.
12 Q And [REDACTED] is somebody you observed at
13 Jeffrey Epstein's house on more than 100
14 occasions between 2002 and 2005, a time period
15 between 14 and 17 years of age for her; is that
16 right?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q And each time [REDACTED] was summoned to
20 Jeffrey Epstein's house, it was for the purposes
21 of Jeffrey Epstein sexually molesting her,
22 correct?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q If it was not Jeffrey Epstein personally

27

1 calling [REDACTED], you observed [REDACTED] to call
2 [REDACTED] for the purposes of her coming over and
3 pleasing Jeffrey Epstein sexually, correct?
4 MR. YAREMA: Object to the form.
5 A Fifth.
6 Q And do you remember the instance where
7 Jeffrey Epstein instructed you to lay down naked
8 and engage in a threesome with [REDACTED] and Jeffrey
9 Epstein?
10 MR. YAREMA: Object to the form.
11 A Fifth.
12 Q Do you remember that that during that
13 threesome, Jeffrey Epstein demanded [REDACTED] to
14 straddle you and otherwise engage sexually with
15 you while Jeffrey Epstein was using vibrators
16 and/or dildos on you?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q In addition to your sexual interactions
20 with [REDACTED], isn't it true that you have used
21 strap-on dildos and vibrators on other underage
22 minors at Jeffrey Epstein's direction?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q You have given oral sex to underage

28

1 minor females?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q You have received oral sex from underage
5 minor females?
6 MR. YAREMA: Object to the form.
7 A Fifth.
8 Q All of these sexual acts with minor
9 females involving you happened in the presence of
10 Jeffrey Epstein?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q During your interaction with underage
14 minor females in a sexual manner, isn't it true
15 that Jeffrey Epstein would participate in the
16 sexual acts and the act would be over upon
17 Jeffrey Epstein ejaculating, correct?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q Did Jeffrey Epstein tell you, that when
21 [REDACTED] was an underage minor female, he forced her
22 to give him oral sex?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Do you remember [REDACTED] coming over, a

29

1 young girl, with braces on, and going up into
2 Jeffrey Epstein's bedroom on numerous occasions
3 to be sexually molested?
4 MR. YAREMA: Object to the form.
5 A Fifth.
6 Q Do you know when it was that Jeffrey
7 Epstein developed his plan or scheme to gain
8 access to hundreds of underage minor females for
9 the purposes of his sexual gratification?
10 MR. YAREMA: Object to the form.
11 A Fifth.
12 Q Were you a part of the planning of that
13 scheme of Jeffrey Epstein's to gain access to
14 underage minor females?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q Do you know Ghislaine Maxwell?
18 A Fifth.
19 Q Is that somebody who helped Jeffrey
20 Epstein to devise the scheme to allow him access
21 to various and a variety of underage minor
22 females?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Is [REDACTED] somebody that was also

8 (Pages 26 to 29)

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1 involved in the planning of this scheme to gain
2 access to underage minor females?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q When is the first time that you observed
6 Jeffrey Epstein's method of enticing or inducing
7 underage minor females into sexual acts with him
8 inside his bedroom?
9 MR. YAREMA: Object to the form.
10 A Fifth.
11 Q Isn't it true that after an underage
12 minor female was brought to Jeffrey Epstein's
13 house, typically [REDACTED], or [REDACTED] or
14 yourself would lead that underage minor female to
15 Jeffrey Epstein's bedroom and leave them alone in
16 the room; is that true?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q Then Jeffrey Epstein would appear either
20 naked or wearing a towel; is that true?
21 MR. YAREMA: Object to the form.
22 A Fifth.
23 Q This is his habit or method of
24 operation, every single time, and that's
25 something that he has told you about his sexual

31

1 interaction with underage minors; is that true?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q And he would direct or demand or
5 instruct the underage minor female to remove her
6 clothing; is that true?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q Then he would perform one or more lewd
10 or lascivious or sexual acts on the underage
11 minor female. Is that true?
12 MR. YAREMA: Object to the form.
13 A Fifth.
14 Q And you have observed Jeffrey Epstein
15 engage in sexual interaction with underage minor
16 females on hundreds and hundreds of occasions,
17 correct?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q And you have observed Jeffrey Epstein
21 using vibrators and sexual toys on underage
22 minors, true?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q In fact, he has also used vibrators and

32

1 sex toys on you, correct?
2 A Fifth.
3 Q And he has instructed you to use sex
4 toys and vibrators on other underage minor
5 females, correct?
6 MR. YAREMA: Object to the form.
7 A Fifth.
8 Q You have observed Jeffrey Epstein
9 digitally penetrate the vagina of underage minor
10 females, including [REDACTED], correct?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q As part of his plan to avoid detection
14 by law enforcement, you have observed Jeffrey
15 Epstein to pay these underage minor females to be
16 quiet, correct?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q And this is something that he has told
20 you he does, for the purposes of grooming these
21 underage minor females, and avoiding law
22 enforcement detection, correct?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Jeffrey Epstein has talked to you about

33

1 the psychology of brainwashing or grooming
2 underage minor females to perform for him
3 sexually, hasn't he?
4 MR. YAREMA: Object to the form.
5 A Fifth.
6 Q And [REDACTED] has also spoken with
7 you about the methodology behind gaining access
8 to and grooming underage minor females for sex?
9 MR. YAREMA: Object to the form.
10 A Fifth.
11 Q Isn't it true that Ghislaine Maxwell and
12 yourself and [REDACTED] had access to a master
13 list of underage minor females names and phone
14 numbers so that they could be called?
15 MR. GOLDBERGER: Time out. Are you
16 talking to me, counsel?
17 MR. HOROWITZ: Nodding my head, back at
18 you. You were nodding at me.
19 MR. GOLDBERGER: I wasn't nodding at
20 you. I'm not talking to you, I'm not
21 communicating with you. I don't know what
22 you think we are doing here. You said "It
23 is true," and I have no idea what you are
24 talking about. Don't interrupt the
25 deposition, okay?

9 (Pages 30 to 33)

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1 MR. HOROWITZ: I think you interrupted.
2 MR. GOLDBERGER: I didn't do a thing --
3 MR. EDWARDS: I don't know what's
4 happened here. It has deteriorated here for
5 no reason whatsoever and has nothing to do
6 with me or the witness.
7 MR. GOLDBERGER: You're 100 percent
8 correct.
9 MR. EDWARDS: Can we go back to it.
10 MR. GOLDBERGER: Absolutely.
11 MR. EDWARDS: Perfect.
12 The silent fight disrupted me. I lost
13 where I am now.
14 MR. GOLDBERGER: Sorry.
15 MR. EDWARDS: Can you read it back.
16 THE COURT REPORTER: Certainly.
17 (The record was read.)
18 MR. EDWARDS: I'll rephrase the
19 question.
20 Q Isn't it true that yourself, Ghislaine
21 Maxwell and [REDACTED] had access to a master
22 of list of underage minor females names and phone
23 numbers so they could be called for the purpose
24 of coming to Jeffrey Epstein's house to be
25 sexually molested?

35

1 MR. YAREMA: Object to the form.
2 A Fifth.
3 Q How many underage minor females are on
4 that master list?
5 MR. YAREMA: Object to the form.
6 A Fifth.
7 Q Are there photographs of these underage
8 minor females on that master list?
9 MR. YAREMA: Object to the form.
10 A Fifth.
11 Q Is that master list saved on a computer
12 system, as has been testified to in the past?
13 MR. YAREMA: Object to the form.
14 A Fifth.
15 Q Has Jeffrey Epstein talked to you about
16 the success of his scheme to procure underage
17 minor females?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q By that, I mean, the method where he
21 molests an underage minor female, then offers
22 them additional money if they will bring him
23 other underage minor females to molest; are you
24 familiar with that system?
25 MR. YAREMA: Object to the form.

36

1 A Fifth.
2 Q In addition to that system, isn't it
3 true that Jeffrey Epstein traffics underage minor
4 females through a modeling agency?
5 MR. YAREMA: Object to the form.
6 A Fifth.
7 Q Is a modeling agency that he is involved
8 in with Jean Luc Brunel; you know who that is
9 right?
10 MR. YAREMA: Object to the form.
11 A Fifth.
12 Q Are you familiar with MC-2 or MC-Squared
13 Modeling Agency?
14 A Fifth.
15 Q You know Jean Luc Brunel, right?
16 MR. YAREMA: Object to the form.
17 A Fifth.
18 Q Is Jean Luc Brunel somebody that you
19 have been made to perform on sexually?
20 MR. YAREMA: Object to the form.
21 A Fifth.
22 Q Jean Luc Brunel is somebody that you
23 know to also be a child molester, true?
24 MR. YAREMA: Object to the form.
25 A Fifth.

37

1 Q This is somebody who for years the
2 public has known of Jean Luc Brunel as a child
3 molester, true?
4 MR. YAREMA: Object to the form.
5 A Fifth.
6 Q In fact, that is the only thing Jeffrey
7 Epstein and Jean Luc Brunel have in common, is
8 their obsession for underage minor females,
9 correct?
10 MR. YAREMA: Object to the form.
11 A Fifth.
12 Q And the modeling agency is but one other
13 mechanism used by Jeffrey Epstein to gain access
14 to underage minor females for sex, true?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q I read you the statute earlier on Lewd
18 and Lascivious Molestation, Chapter 800.04, and
19 that's something that you have witnessed Jeffrey
20 Epstein violate on hundreds of occasions,
21 correct?
22 MR. YAREMA: Object to the form.
23 A Fifth.
24 Q And something that you have witnessed
25 Jeffrey Epstein specifically violate, against

10 (Pages 34 to 37)

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1 ■, true?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q Also a statute you have witnessed
5 Jeffrey Epstein violate against then minor,
6 ■?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q In fact ■, was somebody that Jeffrey
10 Epstein liked or likes; isn't that true?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q ■, was somebody Jeffrey Epstein met
14 when she was only 13 years old and began sexually
15 molesting her the first day that he met her,
16 true?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q ■, was one of his main girls, as he
20 would call them; is that true?
21 MR. YAREMA: Object to the form.
22 A Fifth.
23 Q ■, procured for him or brought for him
24 to his house, over 50 girls between the ages of
25 12 and 15 years old; is that true?

39

1 MR. YAREMA: Object to the form.
2 A Fifth.
3 Q Each of these girls, aged 12 to 15, you
4 observed come into the house, go into Jeffrey
5 Epstein's bedroom and leave the house after being
6 sexually molested, true?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q And in addition to ■, being sexually
10 molested herself, she was enticed or coerced into
11 bringing her friends over, to also be sexually
12 molested, true?
13 MR. YAREMA: Object to the form.
14 A Fifth.
15 Q Has Jeffrey Epstein talked to you about
16 an FBI statement that was given by ■?
17 A Fifth.
18 Q He has also told you that that FBI
19 statement that was favorable for him is
20 completely false; isn't that true?
21 MR. YAREMA: Object to the form.
22 A Fifth.
23 Q Has he spoken to you about the fact that
24 she is now telling the complete story and
25 accurate account as to what happened at Jeffrey

40

1 Epstein's house, and he is using all resources to
2 try to intimidate and harass her; is that true?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q In fact, has he talked to you about his
6 tactic of intimidating and harassing any victims
7 that come forward against him, regarding the
8 sexual abuse that they endured by him?
9 MR. YAREMA: Object to the form.
10 A Fifth.
11 Q Would you agree that Jeffrey Epstein
12 contributed to the delinquency of these various
13 minors that he sexually abused?
14 MR. YAREMA: Object to the form.
15 A Fifth.
16 Q In addition to abusing them, he also
17 encouraged them to return to him to receive more
18 sexual abuse and encouraged them into a life of
19 prostitution, true?
20 MR. YAREMA: Object to the form.
21 A Fifth.
22 Q How many underage minor females have you
23 observed Jeffrey Epstein engage in sex acts with
24 on any of his airplanes?
25 MR. YAREMA: Object to the form.

41

1 A Fifth.
2 Q Have you engaged in sexual acts with any
3 underage minor females on Jeffrey Epstein's
4 airplanes?
5 MR. YAREMA: Object to the form.
6 A Fifth.
7 Q How many times has Jeffrey Epstein
8 talked to you about the reasons why he sexually
9 abuses minors?
10 MR. YAREMA: Object to the form.
11 A Fifth.
12 Q Didn't he tell you that it is his intent
13 to harm these minors in hopes of gaining
14 psychological advantage over them?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q Are you aware that Jeffrey Epstein pled
18 guilty to two felonies related to his interaction
19 with minors?
20 MR. YAREMA: Object to the form.
21 A Fifth.
22 Q And as a result he was incarcerated, and
23 as we spoke about earlier, you visited him in
24 jail on more than 50 occasions, correct?
25 MR. YAREMA: Object to the form.

11 (Pages 38 to 41)

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1 A Fifth.
2 Q Aren't your observations with Jeffrey
3 Epstein's interactions with [REDACTED], wouldn't you
4 agree he coerced her into a life of prostitution?
5 MR. YAREMA: Object to the form.
6 A Fifth.
7 Q And based on your observations of
8 Jeffrey Epstein's interactions with [REDACTED],
9 wouldn't you agree that Jeffrey Epstein coerced
10 her into a life of prostitution?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q And with respect to Jane Doe and [REDACTED]
14 and [REDACTED], wouldn't you agree that Jeffrey Epstein
15 forced these girls to be a prostitute for him?
16 MR. YAREMA: Object to the form.
17 A Fifth.
18 Q Would you agree that Jeffrey Epstein's
19 actions against [REDACTED], [REDACTED], and Jane Doe, were
20 intentional, deliberate and reckless?
21 MR. YAREMA: Object to the form.
22 A Fifth.
23 Q Would you agree that that intentional,
24 deliberate and reckless conduct by Jeffrey
25 Epstein against [REDACTED], [REDACTED], and Jane Doe was

43

1 likely to cause severe emotional distress?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q And isn't it a fact that Jeffrey Epstein
5 has specifically told you that it is his intent
6 to cause severe emotional distress, as it
7 weakened his victims?
8 MR. YAREMA: Object to the form.
9 A Fifth.
10 Q Has Jeffrey Epstein talked to you about
11 your role in what he calls a criminal enterprise?
12 MR. YAREMA: Object to the form.
13 A Fifth.
14 Q Has he talked to you about his
15 organization being a criminal enterprise, that
16 you need to help protect?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q What does Jeffrey Epstein do for a
20 living?
21 A Fifth.
22 Q Does he profit from international sex
23 trafficking of children?
24 MR. YAREMA: Object to the form.
25 A Fifth.

44

1 Q Do you profit from sex trafficking of
2 children?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q Do you know Sergio Cordero?
6 A Fifth.
7 Q Do you know Mike Sanka?
8 A Fifth.
9 Q Would you consider Jeffrey Epstein's
10 criminal enterprise that is designed to molest
11 underage minor females, to be organized?
12 MR. YAREMA: Object to the form.
13 A Fifth.
14 Q Is your role in that criminal
15 arrangement to molest underage minor females, to
16 help organize?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q As part of that organization, isn't it
20 true that you, as well as various staff members,
21 took meticulous messages regarding appointments
22 and scheduling underage minor females to come
23 over to be sexually molested?
24 MR. YAREMA: Object to the form.
25 A Fifth.

45

1 Q These were message pads that had a
2 carbon copy that were positioned or stationed in
3 several places around Jeffrey Epstein's home near
4 the telephone; you're familiar with those,
5 right?
6 MR. YAREMA: Object to the form.
7 A Fifth.
8 Q Since I'm assuming that you are going to
9 take the Fifth on each and every question related
10 to any messages, I will show you only one, which
11 will be marked, this one page, as Plaintiff's
12 Exhibit 1. The date on the message that I will
13 be showing you is 8/21, August 21, 2005.
14 (Message dated August 21, 2005 was
15 marked as Plaintiff's Exhibit number 1 for
16 identification, as of this date.)
17 MR. EDWARDS: Do you want to see it
18 first?
19 MR. GOLDBERGER: (Counsel examines
20 document and hands it to the witness.)
21 Q Would you look at the exhibit, please,
22 if you can see it? I don't know if you can see
23 it over your coffee.
24 A I can see it.
25 Q Okay. Do you recognize it?

12 (Pages 42 to 45)

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1 A Fifth.

2 Q That particular message indicates it is

3 from [REDACTED]. You're the only "[REDACTED]" in the

4 house; is that correct?

5 MR. YAREMA: Object to the form.

6 A Fifth.

7 Q This is a call from you indicating that

8 "[REDACTED] cannot work today and [REDACTED] will be

9 here at 4:00 p.m.;" is that right?

10 MR. YAREMA: Object to the form?

11 A Fifth.

12 Q Who is [REDACTED]?

13 A Fifth.

14 MR. YAREMA: Object to the form.

15 Q That's an underage minor female that was

16 scheduled to be molested at Jeffrey Epstein's

17 house?

18 MR. YAREMA: Object to the form.

19 A Fifth.

20 Q You scheduled that act of molestation;

21 is that right?

22 MR. YAREMA: Object to the form.

23 A Fifth.

24 Q And [REDACTED] will be at the house at 4:00

25 p.m. [REDACTED] is another underage minor female;

47

1 is that correct?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q That's somebody else that you were

5 scheduling to come to his house at 4:00 p.m. for

6 Jeffrey Epstein to engage in sexual acts with

7 her, while she was an underage minor, true?

8 MR. YAREMA: Object to the form.

9 A Fifth.

10 Q Do you know Les Wexner?

11 A Fifth.

12 Q That's somebody that you know owns and

13 operates the Victoria's Secret, the Limited?

14 MR. YAREMA: Object to the form.

15 A Is that a question?

16 Q Is that somebody that you know to own

17 Victoria's Secret or operate Victoria's Secret?

18 A Fifth.

19 Q Do you know if Jeffrey Epstein still

20 talks with Leslie Wexner?

21 MR. YAREMA: Object to the form.

22 A Fifth.

23 Q Do you know Jane Doe-102?

24 A Fifth.

25 Q Are you aware of Jeffrey Epstein and

48

1 Ghislaine Maxwell's sexual interaction with Jane

2 Doe-102 when she was a minor?

3 MR. YAREMA: Object to the form.

4 Q This is one of many underage minor

5 females that was trafficked basically around the

6 globe to be sexually exploited and abused; is

7 that correct?

8 MR. YAREMA: Object to the form.

9 A Fifth.

10 Q Was that typical of Jeffrey Epstein and

11 Ghislaine Maxwell to sexually abuse minors on

12 Jeffrey Epstein's airplane?

13 MR. YAREMA: Object to the form.

14 A Fifth.

15 Q And also typical of Ghislaine Maxwell

16 and Jeffrey Epstein to prostitute or pimp out

17 underage minors to friends?

18 MR. YAREMA: Object to the form.

19 A Fifth.

20 Q By "friends," I am talking specifically

21 about people of royalty, politicians,

22 academicians, businessmen and other professional

23 or personal acquaintances?

24 MR. YAREMA: Object to the form.

25 A Fifth.

49

1 Q Were you with Jeffrey Epstein on his

2 birthday when one of his friends sent to him

3 12 -- sorry, three 12-year olds for the purposes

4 of Jeffrey Epstein sexually abusing them?

5 MR. YAREMA: Object to the form.

6 A Fifth.

7 Q How many occasions have you observed

8 Jeffrey Epstein to receive as gifts from friends,

9 underage minor females for the purposes of him

10 sexually abusing them?

11 MR. YAREMA: Object to the form.

12 A Fifth.

13 Q These three 12-year olds were from

14 France. Were they sent to him on his birthday by

15 Jean Luc Brunel or by somebody else?

16 MR. YAREMA: Object to the form.

17 A Fifth.

18 Q Have you ever been made to engage in sex

19 with 12-year olds?

20 MR. YAREMA: Object to the form.

21 A Fifth.

22 Q Is it true that Jeffrey Epstein makes

23 you dress up as a 12-year old?

24 MR. YAREMA: Object to the form.

25 A Fifth.

50

1 Q As part of being Jeffrey Epstein's sex
2 slave, isn't it true that he asks you or requests
3 of you to dress younger than 12 at times?
4 MR. YAREMA: Object to the form.
5 A Fifth.
6 Q Have you seen naked photographs of the
7 underage minor females with whom Jeffrey Epstein
8 has engaged in sex acts?
9 MR. YAREMA: Object to the form.
10 A Fifth.
11 Q Are there hidden cameras in any of
12 Jeffrey Epstein's homes, that you know to have
13 taken surreptitious videos or photographs of
14 underage minors?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q Does Jeffrey Epstein still watch
18 pornography to this day?
19 MR. YAREMA: Object to the form.
20 A Fifth.
21 Q Does Jeffrey Epstein watch homemade
22 pornographic videos of underage minors engaging
23 in sex orgies on his island?
24 MR. YAREMA: Object to the form.
25 A Fifth.

51

1 Q Prior to the search warrant being
2 executed, you are aware that at least three
3 computers were taken at Jeffrey Epstein's
4 direction, from Jeffrey Epstein's house, to avoid
5 detection by law enforcement, correct?
6 MR. YAREMA: Object to the form.
7 A Correct.
8 Q [REDACTED] and some other person
9 took those computers to avoid Jeffrey Epstein --
10 to avoid the authorities obtaining the evidence
11 contained on those computers, correct?
12 MR. YAREMA: Object to the form.
13 A Fifth.
14 Q Who are the persons along with [REDACTED]
15 [REDACTED] took the computers from Jeffrey
16 Epstein's house prior to the execution of the
17 search warrant?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q Where are those computers today?
21 MR. YAREMA: Object to the form.
22 A Fifth.
23 Q Were they taken by his investigator,
24 Bill Riley?
25 MR. YAREMA: Object to the form.

52

1 A Fifth.
2 Q Do you know Bill Riley?
3 A Fifth.
4 Q Have you seen the flight logs from
5 Jeffrey Epstein's private airplane flights?
6 MR. YAREMA: Object to the form.
7 A Fifth.
8 Q Are you aware that you're listed as a
9 passenger on many flights, along with Jeffrey
10 Epstein on his private airplane?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q Certainly comes as no surprise to you,
14 since you were on his airplane on numerous
15 occasions, correct?
16 MR. YAREMA: Object to the form.
17 A Fifth.
18 Q On September 22, 2003, you were listed
19 as being on a flight with [REDACTED], Jeffrey
20 Epstein, [REDACTED], [REDACTED] and [REDACTED]. My question
21 is who is [REDACTED] and who is [REDACTED].?
22 MR. YAREMA: Object to the form.
23 A Fifth.
24 Q Do you know [REDACTED]?
25 A Fifth.

53

1 Q That's somebody that you're familiar
2 with, because you have been to Jeffrey Epstein's
3 house on many occasions with [REDACTED],
4 correct?
5 MR. YAREMA: Object to the form.
6 A Fifth.
7 Q In fact, do you remember there being a
8 burglary of Jeffrey Epstein's house where he
9 actually called the police to investigate the
10 burglary?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q And during the police investigation
14 inside Jeffrey Epstein's house, you were speaking
15 with [REDACTED], both in person, at Jeffrey
16 Epstein's house, correct?
17 MR. YAREMA: Object to the form.
18 A Correct.
19 Q Is this another person that Jeffrey
20 Epstein, when she was a minor, violated
21 sexually?
22 MR. YAREMA: Object to the form.
23 A Fifth.
24 Q Do you still speak with [REDACTED]?
25 MR. YAREMA: Object to the form.

14 (Pages 50 to 53)

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1 A Fifth.

2 Q Do you know Bill Clinton?

3 A Fifth.

4 Q You have been on Jeffrey Epstein's

5 airplane with Bill Clinton?

6 MR. YAREMA: Object to the form.

7 A Fifth.

8 Q Isn't take true you have been on Jeffrey

9 Epstein's airplane with Doug Band, Bill Clinton's

10 righthand man?

11 MR. YAREMA: Object to the form.

12 A Fifth.

13 Q Have you witnessed improper sexual

14 activity between Jeffrey Epstein and minors,

15 while he was in the presence of Bill Clinton?

16 MR. YAREMA: Object to the form.

17 A Fifth.

18 Q How many times have you ridden on the

19 airplane with Jean Luc Brunel?

20 MR. YAREMA: Object to the form.

21 A Fifth.

22 Q Each time that Jean Luc Brunel visits

23 Jeffrey Epstein's house, does he bring underage

24 minors to Jeffrey Epstein's house to engage in

25 sex with?

55

1 MR. YAREMA: Object to the form.

2 A Fifth.

3 Q Do you know Glenn Dubin?

4 A Fifth.

5 Q Do you know [REDACTED]?

6 A Fifth.

7 Q Is that somebody that was a sexual abuse

8 victim at one point in time of Jeffrey Epstein

9 and Jean Luc Brunel?

10 MR. YAREMA: Object to the form.

11 A Fifth.

12 Q Between 2002 and 2005 when [REDACTED] was

13 abused by Jeffrey Epstein sexually, isn't it true

14 that Jeffrey Epstein took flights to Palm Beach

15 for the purposes of sexually abusing [REDACTED]?

16 MR. YAREMA: Object to the form.

17 A Fifth.

18 Q And between those same years of 2002 and

19 2005, isn't it true that Jeffrey Epstein took

20 airplane flights to Palm Beach from places

21 outside of the State, to engage in sexual acts

22 with [REDACTED]?

23 MR. YAREMA: Object to the form.

24 A Fifth.

25 Q From 2003 through 2005, isn't it true

56

1 Jeffrey Epstein specifically flew to Palm Beach

2 for the purposes of engaging in sex acts with

3 Jane Doe?

4 MR. YAREMA: Object to the form.

5 A Fifth.

6 Q Generally, isn't it true Jeffrey Epstein

7 would fly from place to place for the purpose of

8 engaging in sexual activity with minors at his

9 destination?

10 MR. YAREMA: Object to the form.

11 A Fifth.

12 Q Isn't it true that he employed numerous

13 people for the sole purpose of scheduling

14 appointments with underage minor females at each

15 destination he landed?

16 MR. YAREMA: Object to the form.

17 A Fifth.

18 Q What is Jeffrey Epstein's relationship

19 with Sandy Berger?

20 MR. YAREMA: Object to the form.

21 A Fifth.

22 Q Do you know what Jeffrey Epstein's

23 relationship is with Alan Dershowitz?

24 MR. YAREMA: Object to the form.

25 A Fifth.

57

1 Q That's somebody who you know to have

2 stayed at Jeffrey Epstein's house on many

3 occasions, correct?

4 MR. YAREMA: Object to the form.

5 A Fifth.

6 Q And also somebody who you know to have

7 been at the house when [REDACTED] was in Jeffrey

8 Epstein's bedroom getting sexually abused,

9 correct?

10 MR. YAREMA: Object to the form.

11 A Fifth.

12 Q Alan Dershowitz is also somebody that

13 you also know to have been at the house when [REDACTED]

14 was being sexually abused in Jeffrey Epstein's

15 bedroom, correct?

16 MR. YAREMA: Object to the form.

17 A Fifth.

18 Q Generally, Alan Dershowitz is familiar

19 with Jeffrey Epstein's habit of engaging in

20 sexual acts with minors on a daily basis,

21 correct?

22 MR. YAREMA: Object to the form.

23 A Fifth.

24 Q When Alan Dershowitz was in town,

25 Jeffrey Epstein did not break his schedule for

15 (Pages 54 to 57)

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1 Alan Dershowitz, meaning he continued to sexually
2 abuse minors despite Alan Dershowitz being a
3 guest in the house?
4 MR. YAREMA: Object to the form.
5 A Fifth.
6 Q Alan Dershowitz never engaged in any
7 sexual activity with these underage minors; isn't
8 that true?
9 MR. YAREMA: Object to the form.
10 A Fifth.
11 Q Have you been made to have sex with
12 Ghislaine Maxwell?
13 MR. YAREMA: Object to the form.
14 A Fifth.
15 Q Do you know [REDACTED]?
16 A Fifth.
17 Q Similar to you being Jeffrey Epstein's
18 sex slave, is [REDACTED], or was [REDACTED]
19 Ghislaine Maxwell's sex slave?
20 MR. YAREMA: Object to the form.
21 A Fifth.
22 Q Ghislaine Maxwell is somebody who you
23 know to be bi-sexual, true?
24 MR. YAREMA: Object to the form.
25 A Fifth.

59

1 Q You know that Ghislaine Maxwell engaged
2 in sexual acts with underage minor females, true?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q This is yet another friend of Jeffrey
6 Epstein's that is into the act of molesting
7 underage minor females, right?
8 MR. YAREMA: Object to the form.
9 A Fifth.
10 Q Now, you are the next participant in
11 that activity, meaning you have been groomed to
12 enjoy and appreciate the acts of sex with
13 underage minors, true?
14 MR. YAREMA: Object to the form.
15 A Fifth.
16 Q Has Jeffrey Epstein instructed you to
17 lie to his Probation Officer in any way?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q Mr. Visoski testified that you took a
21 helicopter flight within the last year with
22 Jeffrey Epstein to Miami. Do you remember that
23 flight?
24 MR. YAREMA: Object to the form.
25 A Fifth.

60

1 Q What was the purpose of that flight?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q Did you sign a confidentiality agreement
5 with Jeffrey Epstein?
6 MR. YAREMA: Object to the form.
7 A Fifth.
8 Q When is the last time that you observed
9 Jeffrey Epstein have sex with a minor?
10 MR. YAREMA: Object to the form.
11 A Fifth.
12 Q Since being on probation, has Jeffrey
13 Epstein been able to, or has he flown to his
14 island?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q To your knowledge, has Jeffrey Epstein
18 flown to New York while on probation or community
19 control?
20 MR. YAREMA: Object to the form.
21 A Fifth.
22 Q Isn't it true that he has flown both to
23 New York and to his island, and you have
24 accompanied him on those trips, since he was on
25 community control?

61

1 MR. YAREMA: Object to the form.
2 A Fifth.
3 Q Isn't it also true that Jeffrey Epstein
4 has indicated to you that he will always engage
5 in sex acts with underage minor females?
6 MR. YAREMA: Object to the form.
7 A Fifth.
8 Q In fact, that's something that he has
9 told you, that he believes he is entitled to do;
10 isn't that right?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q Isn't it true that Jeffrey Epstein
14 believes and has told you that if he doesn't
15 physically force the underage minor female into
16 any act, then he is entitled to engage in sex
17 with any underage minor female despite the age?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q What is the youngest female you have
21 witnessed or observed Jeffrey Epstein to engage
22 in sex with?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Do you have a bank account at Chase Bank

16 (Pages 58 to 61)

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1 in New York?

2 A Fifth.

3 Q And the money in that bank account under

4 your name is money that was given to you by

5 Jeffrey Epstein, correct?

6 MR. YAREMA: Object to the form.

7 A Fifth.

8 Q For the passed ten or so years, you have

9 lived with Jeffrey Epstein under his control,

10 right?

11 MR. YAREMA: Object to the form.

12 A Fifth.

13 Q You get to lead the life of a

14 millionaire, and to lead that life, you were only

15 required to be Jeffrey Epstein's sex slave and to

16 bring Jeffrey Epstein other slaves?

17 MR. YAREMA: Object to the form.

18 A Fifth.

19 Q Is this 301 East 66th Street apartment

20 still an apartment that you frequent today?

21 MR. YAREMA: Object to the form.

22 A Fifth.

23 Q And you're familiar with the nine or ten

24 apartments that Jeffrey Epstein owns or controls

25 up there at 301 East 66th Street, aren't you?

63

1 MR. YAREMA: Object to the form.

2 A Fifth.

3 Q At any given time, there are between 8

4 and 16 underage minors living in or staying at

5 those apartments?

6 MR. YAREMA: Object to the form.

7 A Fifth.

8 Q On the various passenger lists on

9 Jeffrey Epstein's airplane, where it will list,

10 for instance, Jeffrey Epstein, [REDACTED],

11 [REDACTED] going from Florida to St.

12 Thomas, then generically, female, female; would

13 you know who those female, females are?

14 MR. YAREMA: Object to the form.

15 A Fifth.

16 Q Are those females listed generically

17 rather than specifically because they are

18 underage minor females engaging in sex with you

19 or Jeffrey Epstein?

20 MR. YAREMA: Object to the form.

21 A Fifth.

22 Q Is [REDACTED] someone that you see on

23 a regular basis at Jeffrey Epstein's house?

24 MR. YAREMA: Object to the form.

25 A Fifth.

64

1 Q That's somebody who these days refers to

2 himself as Jeffrey Epstein's personal assistant,

3 right?

4 MR. YAREMA: Object to the form.

5 A Fifth.

6 Q That's somebody who you know to work for

7 or at the Florida Science Foundation, which is

8 owned by Jeffrey Epstein, correct?

9 MR. YAREMA: Object to the form.

10 A Fifth.

11 Q It is also somebody that you know to

12 have stayed at Jeffrey Epstein's house with [REDACTED]

13 [REDACTED], correct?

14 MR. YAREMA: Object to the form.

15 A Fifth.

16 Q This is somebody that has been

17 involved -- [REDACTED] is somebody who's been

18 involved sexually with [REDACTED] for at least

19 a year, right?

20 MR. YAREMA: Object to the form.

21 A Fifth.

22 Q In fact, you know that they took a trip

23 around the world together and during that trip

24 they discussed Jeffrey Epstein and his

25 interaction with underage minor females,

65

1 correct?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 MR. EDWARDS: Done. I don't have

5 anything else.

6 MR. GOLDBERGER: Okay.

7 MR. HOROWITZ: I do, why don't we take a

8 short break.

9 MR. GOLDBERGER: We are stopping at

10 11:50.

11 MR. HOROWITZ: What?

12 MR. GOLDBERGER: 11:50.

13 MR. HOROWITZ: I kind of remember that

14 e-mail.

15 THE VIDEOGRAPHER: Off the video record.

16 (Pause in the proceedings.)

17 THE VIDEOGRAPHER: We are back on the

18 video record at 11:18 a.m.)

19 (At this time Robert Critton joined the

20 proceedings.)

21 CROSS EXAMINATION

22 BY MR. HOROWITZ:

23 Q [REDACTED], between 2001 and 2006,

24 did Jeffrey Epstein instruct you to place

25 telephone calls to arrange for girls under the

66

1 age of 18 to come to his home for his sexual
2 gratification?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q Between 2001 and 2006 did you, in fact,
6 place telephone calls to arrange for girls under
7 the age of 18 to come to Jeffrey Epstein's home
8 for his sexual gratification?
9 MR. YAREMA: Object to the form.
10 A Fifth.
11 Q Are you personally aware that a girl
12 named [REDACTED] came to Jeffrey Epstein's Palm Beach
13 home in late 2004?
14 MR. YAREMA: Object to the form.
15 A Fifth.
16 Q Did Jeffrey Epstein admit to you he
17 sexually abused [REDACTED]?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q Isn't it true in late 2004 you made
21 arrangements by telephone to bring [REDACTED] to
22 Jeffrey Epstein's home?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Did Jeffrey Epstein instruct you to

67

1 communicate by telephone to arrange for [REDACTED] to
2 come to his home for his sexual gratification?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q Did Jeffrey Epstein inform you that [REDACTED]
6 would be giving him a massage that was sexual in
7 nature?
8 MR. YAREMA: Object to the form.
9 A Fifth.
10 Q Did Jeffrey Epstein tell you it was his
11 intent during the course of [REDACTED]'s visit to his
12 home to persuade, induce or entice her to engage
13 in sexual activity?
14 MR. YAREMA: Object to the form.
15 A Fifth.
16 Q Did Jeffrey Epstein tell you that, in
17 fact, he succeeded in persuading, inducing or
18 enticing [REDACTED] to engage in sexual activity with
19 him?
20 MR. YAREMA: Object to the form.
21 A Fifth.
22 Q Are you personally aware that a girl
23 named [REDACTED] came to Jeffrey Epstein's Palm Beach
24 home on multiple occasions in 2004?
25 MR. YAREMA: Object to the form.

68

1 A Fifth.
2 Q Did Jeffrey Epstein admit to you that he
3 sexually abused [REDACTED] in his Palm Beach home in
4 2004?
5 MR. YAREMA: Object to the form.
6 A Fifth.
7 Q Did you ever instruct a girl named [REDACTED]
8 [REDACTED] to bring other underage girls to Jeffrey
9 Epstein's home for Jeffrey Epstein's sexual
10 pleasure?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q In 2004 did you communicate by telephone
14 with [REDACTED] [REDACTED] for the purpose of bringing
15 [REDACTED] to Jeffrey Epstein's home for sexual
16 activity MR. YAREMA: Object to the form.
17 A Fifth.
18 Q Did Jeffrey Epstein instruct you to
19 communicate with [REDACTED] [REDACTED] for the purpose of
20 making arrangements for [REDACTED] to come to his home?
21 MR. YAREMA: Object to the form.
22 A Fifth.
23 Q Did Jeffrey Epstein tell you it was his
24 intent during the course of [REDACTED]'s visit to his
25 home to persuade, induce or entice her to engage

69

1 in sexual activity with him?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q Did Jeffrey Epstein admit to you that he
5 had succeeded in, in fact, persuading, inducing
6 or enticing [REDACTED] to engage in sexual activity
7 with him?
8 MR. YAREMA: Object to the form.
9 A Fifth.
10 Q Are you personally aware that a teenage
11 girl named [REDACTED], came to Jeffrey Epstein's Palm
12 Beach home on multiple occasions between 2003 and
13 2005?
14 MR. YAREMA: Object to the form.
15 A Fifth.
16 Q Did Jeffrey Epstein admit to you that he
17 sexually abused [REDACTED]?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q At any time prior to May of 2005, did
21 Jeffrey Epstein instruct you to place telephone
22 calls to [REDACTED] for the purpose of arranging for
23 her to come to his home and engage in sexual
24 activity?
25 MR. YAREMA: Object to the form.

70

1 A Fifth.

2 Q Did you, in fact, communicate by

3 telephone with [REDACTED] for the purpose of arranging

4 for her to come to his home for sexual activity?

5 MR. YAREMA: Object to the form.

6 A Fifth.

7 Q At any time prior to May of 2005, did

8 you place a telephone call to [REDACTED] [REDACTED]

9 wherein you arranged for [REDACTED] to come to Jeffrey

10 Epstein's home for sexual activity?

11 MR. YAREMA: Object to the form.

12 A Fifth.

13 Q Prior to May of 2005, did you ever

14 observe [REDACTED] speaking with [REDACTED] by

15 telephone to arrange for [REDACTED] to come to Jeffrey

16 Epstein's home?

17 MR. YAREMA: Object to the form.

18 A Fifth.

19 Q Did Jeffrey Epstein tell you that it was

20 his intention to sexually abuse [REDACTED] during the

21 course of her visits to his home?

22 MR. YAREMA: Object to the form.

23 A Fifth.

24 Q Did Jeffrey Epstein tell you that he

25 succeeded in engaging [REDACTED] in sexual activity

71

1 while she was still a minor, at his home?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q Are you personally aware that a teenage

5 girl named an [REDACTED], came to Jeffrey Epstein's

6 Palm Beach home in approximately 2001 or 2002?

7 MR. YAREMA: Object to the form.

8 A Fifth.

9 Q Did Jeffrey Epstein admit to you that he

10 sexually abused [REDACTED] at his home while she was

11 still a child?

12 MR. YAREMA: Object to the form.

13 A Fifth.

14 Q In 2001 or 2002, did [REDACTED] inform

15 you that she received a telephone call in which

16 she was referred to [REDACTED], who would be willing to

17 come to Jeffrey Epstein's home for sexual

18 activity?

19 MR. YAREMA: Object to the form.

20 A Fifth.

21 (Whereupon, at this point in the

22 proceedings, Robert Critton left the

23 deposition room.)

24 Q Did Jeffrey Epstein instruct you to call

25 [REDACTED] to come to his home and give him a massage

72

1 in either 2001 or 2002?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q Did you, in fact, call [REDACTED] to come to

5 Jeffrey Epstein's home and give him a massage in

6 a sexual nature in 2001 or 2002?

7 MR. YAREMA: Object to the form.

8 A Fifth.

9 Q Did you either observe or overhear [REDACTED]

10 [REDACTED] speaking with [REDACTED] on the telephone to

11 arrange for [REDACTED] to come to Jeffrey Epstein's

12 home for a massage of a sexual nature?

13 MR. YAREMA: Object to the form.

14 A Fifth.

15 Q Did Jeffrey Epstein tell you it was his

16 intent during the course of [REDACTED]'s visit to his

17 home to persuade, induce or entice her to engage

18 in sexual activity?

19 MR. YAREMA: Object to the form.

20 A Fifth.

21 Q Didn't Jeffrey Epstein admit to you that

22 he succeeded in persuading, inducing or enticing

23 [REDACTED] to engage in sexual activity with him at his

24 home while she was still a minor?

25 MR. YAREMA: Object to the form.

73

1 A Fifth.

2 Q Are you personally aware that a girl

3 named [REDACTED] came to Jeffrey Epstein's home in

4 approximately August 2004?

5 MR. YAREMA: Object to the form.

6 A Fifth.

7 Q Did Jeffrey Epstein admit to you that he

8 had sexually abused [REDACTED] when she was only 13

9 years old?

10 MR. YAREMA: Object to the form.

11 A Fifth.

12 Q In 2004 did you participate in a

13 telephone call wherein you arranged for [REDACTED] to

14 come to Jeffrey Epstein's home for the purpose of

15 giving him a massage that was to be sexual in

16 nature?

17 MR. YAREMA: Object to the form.

18 A Fifth.

19 Q Did Jeffrey Epstein instruct you to

20 communicate by telephone and make arrangements

21 for [REDACTED] to come to his home for sexual activity

22 while she was still a child?

23 MR. YAREMA: Object to the form.

24 A Fifth.

25 Q Did Jeffrey Epstein tell you it was his

19 (Pages 70 to 73)

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1 intention during the course of [REDACTED]'s visit to
2 his home to persuade, induce or entice her to
3 engage in sexual activity with him?
4 MR. YAREMA: Object to the form.
5 A Fifth.
6 Q Did Jeffrey Epstein tell you that, in
7 fact, he succeeded in persuading, inducing and
8 enticing [REDACTED] to engage in sexual activity with
9 him while she was still a child at his home?
10 MR. YAREMA: Object to the form.
11 A Fifth.
12 Q Are you personally aware that a girl
13 named [REDACTED] came to Jeffrey Epstein's home in Palm
14 Beach on multiple occasions between 2003 and May
15 of 2005?
16 MR. YAREMA: Object to the form.
17 A Fifth.
18 Q Did Jeffrey Epstein admit to you that he
19 sexually abused [REDACTED] at his home between 2003 and
20 May of 2005?
21 MR. YAREMA: Object to the form.
22 A Fifth.
23 Q Prior to May of 2005, did you receive a
24 phone call from a girl named [REDACTED] wherein
25 she told you she was bringing [REDACTED] to Jeffrey

75

1 Epstein's home to give him a massage?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q At any time prior to 2005, did Jeffrey
5 Epstein instruct you to communicate with [REDACTED]
6 [REDACTED] by telephone to make arrangements for [REDACTED]
7 to come to his home?
8 MR. YAREMA: Object to the form.
9 A Fifth.
10 Q Prior to [REDACTED]'s visits to Jeffrey
11 Epstein's home, did Jeffrey Epstein tell you it
12 was his intention to induce, entice and engage
13 [REDACTED], to engage in sexual activity with him?
14 MR. YAREMA: Object to the form.
15 A Fifth.
16 Q After [REDACTED]'s visits to Jeffrey Epstein's
17 home, did Jeffrey Epstein tell you that he
18 succeeded in enticing, engaging and persuading
19 [REDACTED] to engage in sexual activity with him while
20 she was still a child?
21 MR. YAREMA: Object to the form.
22 A Fifth.
23 Q Are you personally aware that a teenage
24 girl named [REDACTED] came to Jeffrey Epstein's Palm
25 Beach home in approximately 2001 or 2002?

76

1 MR. YAREMA: Object to the form.
2 A Fifth.
3 Q Did you participate in a telephone call
4 wherein you arranged for [REDACTED] to come to Jeffrey
5 Epstein's home for a massage?
6 MR. YAREMA: Object to the form.
7 A Fifth.
8 Q Did Jeffrey Epstein instruct you to
9 participate in a telephone call wherein you were
10 to arrange for [REDACTED] to come to his home for
11 sexual activity?
12 MR. YAREMA: Object to the form.
13 A Fifth.
14 Q Did Jeffrey Epstein admit to you it was
15 his intention during the course of [REDACTED]'s visit
16 to his home, to engage her in sexual activity
17 while she was still a child?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q Did Jeffrey Epstein admit to you he had,
21 in fact, persuaded, enticed and engaged [REDACTED] in
22 sexual activity at his home while she was still a
23 child?
24 MR. YAREMA: Object to the form.
25 A Fifth.

77

1 MR. HOROWITZ: No other questions at
2 this point.
3 MR. LANGINO: I have less than ten
4 minutes of questioning.
5 MR. GOLDBERGER: Fine, that will bring
6 us right to the break.
7 CROSS EXAMINATION
8 BY MR. LANGINO:
9 Q I'm Adam Langino and I represent [REDACTED]
10 and [REDACTED].
11 Do you know an individual named [REDACTED]?
12 A Fifth.
13 Q Do you know an individual named [REDACTED]?
14 A Fifth.
15 Q Have you seen [REDACTED] at the defendant's
16 Palm Beach property?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q Have you seen [REDACTED] at the defendant's
20 Palm Beach property?
21 MR. YAREMA: Object to the form.
22 A Fifth.
23 Q Have you ever engaged in a sexual act
24 with [REDACTED].... [REDACTED]?
25 MR. YAREMA: Object to the form.

20 (Pages 74 to 77)

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1 A Fifth.
2 Q Have you ever engaged in a sexual act
3 with [REDACTED]... [REDACTED].?
4 MR. YAREMA: Object to the form.
5 A Fifth.
6 Q Did you ever observe the defendant,
7 Jeffrey Epstein, with [REDACTED].?
8 MR. YAREMA: Object to the form.
9 A Fifth.
10 Q Did you ever observe the defendant,
11 Jeffrey Epstein, with [REDACTED].?
12 MR. YAREMA: Object to the form?
13 A Fifth.
14 Q Have you ever physically touched [REDACTED].?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q Have you ever physically touched [REDACTED].?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q Has the defendant ever made a statement
21 to you about [REDACTED].?
22 MR. YAREMA: Object to the form.
23 A Fifth.
24 Q Has the defendant ever made a statement
25 to you about [REDACTED].?

79

1 MR. YAREMA: Object to the form.
2 A Fifth.
3 Q Has [REDACTED] ever made a statement
4 to you about [REDACTED].?
5 MR. YAREMA: Object to the form.
6 A Fifth.
7 Q Has [REDACTED] ever made a statement
8 to you about [REDACTED].?
9 MR. YAREMA: Object to the form.
10 A Fifth.
11 Q Have you ever communicated with [REDACTED].?
12 MR. YAREMA: Object to the form.
13 A Fifth.
14 Q Have you ever communicated with [REDACTED].?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q Did you know that [REDACTED], [REDACTED] was a minor
18 at the time of sexual abuse?
19 MR. YAREMA: Object to the form.
20 A Fifth.
21 Q Did you know [REDACTED]... [REDACTED] was a minor at
22 the time of the sexual abuse?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Do you know if [REDACTED]'s sexual activity

80

1 with the defendant was consensual?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q Do you know if [REDACTED]'s sexual activity
5 with the defendant was consensual?
6 MR. YAREMA: Object to the form.
7 A Fifth.
8 Q When you participated in sexual acts
9 with each minor, how did you feel?
10 MR. YAREMA: Object to the form.
11 A Fifth.
12 Q In your heart, did you know it was
13 wrong?
14 MR. YAREMA: Object to the form, and in
15 addition this is irrelevant and has already
16 been addressed by Judge Hafele as an
17 inappropriate question. That's my
18 objection.
19 A Fifth.
20 Q During this time period did you feel
21 confused?
22 MR. YAREMA: Object to the form.
23 MR. GOLDBERGER: Same --
24 MR. YAREMA: Same objection.
25 A Fifth.

81

1 Q Are you currently in love with the
2 defendant?
3 MR. YAREMA: Object to the form, same
4 objection. That question has no relevance
5 to this... it is inappropriate per Judge
6 Hafele's order.
7 MR. GOLDBERGER: Also involves privacy
8 rights of my client. I instruct her not to
9 answer the question.
10 A Fifth.
11 Q Have you ever been in love with Jeffrey
12 Epstein?
13 MR. GOLDBERGER: Same objection.
14 MR. YAREMA: Same objections.
15 A Fifth.
16 MR. LANGINO: Thank you.
17 CROSS EXAMINATION
18 BY [REDACTED] EZELL:
19 (Discussion off the record.)
20 Q Good morning, [REDACTED]. I'm
21 Katherine Ezell and I represent Jane Doe 103,
22 whose name is [REDACTED], which shall appear as [REDACTED] in
23 the deposition.
24 Are you aware that in 2004 and 5, there
25 was a sort of hidden staircase that would take

21 (Pages 78 to 81)

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1 one from the kitchen upstairs to the master
2 bedroom and massage area?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q Do you recall there being nude
6 photographs on the staircase?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q Did you know [REDACTED].?
10 A Fifth.
11 Q Did [REDACTED] come to the house at 358 El
12 Brillo Way to provide a massage to Jeffrey
13 Epstein?
14 MR. YAREMA: Object to the form.
15 A Fifth.
16 Q Did that massage become sexual in
17 nature?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q Did [REDACTED] become a regular visitor at
21 Jeffrey Epstein's house?
22 MR. YAREMA: Object to the form.
23 A Fifth.
24 Q Do you remember that she came maybe
25 hundreds of times?

83

1 MR. YAREMA: Object to the form.
2 A Fifth.
3 Q Do you recall that she was under the age
4 of 18 at the time she was coming to Jeffrey
5 Epstein's home?
6 MR. YAREMA: Object to the form.
7 A Fifth.
8 Q Were you younger than [REDACTED] at the time?
9 MR. YAREMA: Object to the form.
10 A Fifth.
11 Q Do you remember occasions when you and
12 Jeffrey Epstein were already in bed when [REDACTED]1.
13 arrived?
14 MR. YAREMA: Object to the form.
15 A Fifth.
16 Q Do you recall Jeffrey Epstein
17 instructing [REDACTED] to remove her clothes and join
18 the two of you in bed?
19 MR. YAREMA: Object to the form.
20 A Fifth.
21 Q Do you recall that you and Jeffrey
22 Epstein bringing sex toys in bed for you and [REDACTED]
23 to use on each other?
24 MR. YAREMA: Object to the form.
25 A Fifth.

84

1 Q Do you recall that Jeffrey Epstein would
2 join in by performing oral sex on one or the
3 other of you -- you or [REDACTED].?
4 MR. YAREMA: Object to the form.
5 A Fifth.
6 Q Do you recall that also happening,
7 meaning the oral sex, being performed on the
8 massage table --
9 MR. YAREMA: Objection.
10 Q -- to [REDACTED].?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q Were you present one day when Jeffrey
14 Epstein held [REDACTED] down on the massage table and
15 while holding her inserted his penis into [REDACTED]'s
16 vagina?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q Do you recall he stated that he wanted
20 you to observe this?
21 MR. YAREMA: Object to the form.
22 A Fifth.
23 Q Do you recall that [REDACTED] had rules,
24 lines, that she had stated Jeffrey Epstein was
25 not to cross, in their encounters?

85

1 MR. YAREMA: Object to the form.
2 A Fifth.
3 Q Do you recall that [REDACTED] had forbidden
4 any kind of vaginal penetration?
5 MR. YAREMA: Object to the form.
6 A Fifth.
7 Q Do you recall that [REDACTED] refused to touch
8 Jeffrey Epstein's penis?
9 MR. YAREMA: Object to the form.
10 A Fifth.
11 Q Do you recall that day when Jeffrey
12 Epstein held [REDACTED] on her stomach on the massage
13 table and began pumping his penis into her
14 vagina, that she screamed "No"?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q Do you recall that upon her screaming,
18 Epstein stopped and apologized?
19 MR. YAREMA: Object to the form.
20 A Fifth.
21 Q Do you recall that Jeffrey Epstein paid
22 her \$1,000 for that visit?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Did you engage in sex with [REDACTED] when she

22 (Pages 82 to 85)

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1 was under 18?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q Did Jeffrey Epstein watch you and [REDACTED]
5 having sex while he masturbated?
6 MR. YAREMA: Object to the form.
7 A Fifth.
8 Q Are you aware that [REDACTED]'s activities
9 with Jeffrey Epstein escalated further and
10 further as time went on?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q Did you see Jeffrey Epstein use
14 vibrators and strap-on -- use vibrators on [REDACTED]?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q Did you and [REDACTED] engage in sex with
18 strap-on penises?
19 MR. YAREMA: Object to the form.
20 A Fifth.
21 Q Did you see Jeffrey Epstein perform oral
22 sex on [REDACTED] numerous times?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Did Jeffrey Epstein pay [REDACTED] an

87

1 additional \$200 to perform oral sex on you?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q Do you recall that each time a new toy
5 or activity was introduced when [REDACTED] was there to
6 give massages, Jeffrey Epstein paid [REDACTED]
7 additional money?
8 MR. YAREMA: Object to the form.
9 A Fifth.
10 Q Would Jeffrey Epstein masturbate while
11 watching you and [REDACTED] perform sexual acts?
12 MR. YAREMA: Object to the form.
13 A Fifth.
14 Q Do you recall that Jeffrey Epstein
15 provided [REDACTED] with gifts of purses and
16 bathingsuits?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q Do you recall that Jeffrey Epstein
20 provided [REDACTED] with a blue 2000 Dodge Neon which
21 had been rented for her?
22 MR. YAREMA: Object to the form.
23 A Fifth.
24 Q Do you recall that Jeffrey Epstein
25 ordered that roses be delivered to [REDACTED] at the

88

1 end of a play performance during her senior year?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 THE VIDEOGRAPHER: Counsel, can we stop
5 for one minute?
6 MS. EZELL: Sure.
7 THE VIDEOGRAPHER: Off the video record
8 11:43 a.m.
9 (Short pause.)
10 (Whereupon at this point in time, Mr.
11 Langino left the proceedings.)
12 THE VIDEOGRAPHER: Back on the video
13 record 1:43 a.m.
14 CROSS EXAMINATION (CONTINUED)
15 BY MS. EZELL:
16 Q Were you present in October 2005 when
17 the Palm Beach Police Department raided Jeffrey
18 Epstein's home?
19 MR. YAREMA: Object to the form.
20 A Fifth.
21 Q You and others were aware that there
22 would be a raid at that time; were you not?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Who informed you that there would be a

89

1 raid on the house?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q Did you participate in the removal of
5 nude photographs, sex toys, computer records from
6 358 El Brillo Way prior to the raid?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q Do you know who removed those objects at
10 that time?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q Do you remember that at times Jeffrey
14 Epstein paid [REDACTED] to just sleep in his bed in the
15 nude?
16 MR. YAREMA: Object to the form.
17 A Fifth.
18 Q Do you recall at times he paid her to
19 just cuddle with him?
20 MR. YAREMA: Object to the form.
21 A Fifth.
22 Q Did you ever drive [REDACTED] to or from 358
23 El Brillo Way?
24 MR. YAREMA: Object to the form.
25 A Fifth.

23 (Pages 86 to 89)

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1 Q Did you ever know ██████ to drive
2 A.H. to or from 358 El Brillo Way?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q Do you remember the houseman at that
6 time as being Alfredo Rodriguez?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q Do you remember Alfredo Rodriguez being
10 instructed to drive ██████ to or from 358 El Brillo
11 Way?
12 MR. YAREMA: Object to the form.
13 A Fifth.
14 Q Do you recall a time when Alfredo
15 Rodriguez discovered ██████ asleep upstairs naked?
16 MR. YAREMA: Object to the form.
17 A Fifth.
18 Q Were you aware Jeffrey Epstein
19 repeatedly asked ██████ to allow him to photograph
20 her in the nude?
21 MR. YAREMA: Object to the form.
22 A Fifth.
23 Q Did you allow Jeffrey Epstein to take
24 photographs, nude photographs of you?
25 MR. YAREMA: Object to the form.

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1 A Fifth.
2 Q Do you recall a time when ██████ gave in
3 and did allow Jeffrey Epstein to photograph her
4 while nude?
5 MR. YAREMA: Object to the form.
6 A Fifth.
7 Q Did you ever see any of those
8 photographs taken by Jeffrey Epstein of ██████ in
9 the nude?
10 MR. YAREMA: Object to the form.
11 A Fifth.
12 Q Do you know whether those photographs
13 were ever developed?
14 MR. YAREMA: Object to the form.
15 A Fifth.
16 Q Do you know what kind of camera Jeffrey
17 Epstein liked to use when taking photographs of
18 women posing in the nude?
19 MR. YAREMA: Object to the form.
20 A Fifth.
21 Q Did you ever hear here Jeffrey Epstein
22 tell ██████ that she needed to lose ten pounds?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Did you ever hear here him tell her that

92

1 he would pay her 1,000 or \$1,500 if she would
2 lose ten pounds?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q Did you know ██████ to be a good student?
6 MR. YAREMA: Object to the form.
7 A Fifth.
8 Q Did it appear that you that ██████ was
9 smart?
10 MR. YAREMA: Object to the form.
11 A Fifth.
12 Q Did you observe that ██████ was concerned
13 about her grades?
14 MR. YAREMA: Object to the form.
15 A Fifth.
16 Q Do you recall Jeffrey Epstein expressing
17 interest in ██████'s college ambitions?
18 MR. YAREMA: Object to the form.
19 A Fifth.
20 Q Have you known Jeffrey Epstein to brag
21 about donations he's made to colleges like NYU,
22 Columbia, Harvard and Wharton?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Do you know that ██████ wanted very much

93

1 to go to school in New York at NYU or at
2 Columbia?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q Did you know that Jeffrey Epstein
6 promised to help her get into one of those
7 schools?
8 MR. YAREMA: Object to the form.
9 A Fifth.
10 Q Do you know whether he did help?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q Do you know whether he offered to pay
14 some of her college expenses?
15 MR. YAREMA: Object to the form.
16 A Fifth.
17 Q Did you ever observe Jeffrey Epstein
18 working with ██████ on her college applications?
19 MR. YAREMA: Object to the form.
20 A Fifth.
21 Q Did you ever see ██████ just hanging out
22 at Jeffrey Epstein's house studying while nude?
23 MR. YAREMA: Object to the form.
24 A Fifth.
25 Q Did you know that Jeffrey Epstein gave

24 (Pages 90 to 93)

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1 ■, airline tickets and theater tickets in New
2 York?
3 MR. YAREMA: Object to the form.
4 A Fifth.
5 Q Did you and ■ ever go shopping
6 together?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q Did you call ■ once and ask her to go
10 shopping with you for Jeffrey Epstein on his
11 birthday?
12 MR. YAREMA: Object to the form.
13 A Fifth.
14 Q Did you and ■ purchase adult sex toys
15 to use for Jeffrey Epstein's birthday, as a show,
16 for him?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q Are you aware that Jeffrey Epstein told
20 ■ he would pay her to bring other young girls
21 to give him massages?
22 MR. YAREMA: Object to the form.
23 A Fifth.
24 Q Do you know that Jeffrey Epstein paid
25 ■ \$200 for each girl that she brought to him,

95

1 to give him a massage?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 MR. GOLDBERGER: I guess we will have to
5 take a break now, if that's all right with
6 you.
7 MS. EZELL: Okay.
8 THE VIDEOGRAPHER: 11:50 a.m., going off
9 the video record.
10 MR. GOLDBERGER: I will be done at 1:15
11 so we can go until 1:30.
12 (Pause in the proceedings.)
13 THE VIDEOGRAPHER: We are back on the
14 video record at 1:36 p.m.
15 CROSS EXAMINATION (CONTINUED)
16 BY MS. EZELL:
17 Q ■, did you ever have dinner
18 at Jeffrey Epstein's house, with David
19 Copperfield as a guest, when ■ was present?
20 MR. YAREMA: Object to the form.
21 A The Fifth.
22 Q Have you met David Copperfield?
23 A Fifth.
24 Q Have you ever been given tickets to go
25 see one of his shows?

96

1 A The Fifth.
2 Q Do you know if typically girls who
3 Epstein knew, were given tickets to go to the
4 show, then invited back stage?
5 MR. YAREMA: Object to the form.
6 A Fifth.
7 THE VIDEOGRAPHER: Can you speak up?
8 THE WITNESS: (Adjusts microphone.)
9 Q Did ■ ever tell you that David
10 Copperfield tried to feel her butt during dinner?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q Did you ever hear Jeffrey Epstein
14 telling any of the young women who came to give
15 him massages, that he was a brain scientist?
16 MR. YAREMA: Object to the form.
17 A Fifth.
18 Q Did you know ■?
19 A Fifth.
20 Q And from now on I will use the initials
21 ■. Do you know that ■ visited Jeffrey
22 Epstein at 358 El Brillo Way some 15 to 20 times?
23 MR. YAREMA: Object to the form?
24 A Fifth.
25 Q Did you ever interact with ■ while

97

1 she was there to give a massage?
2 MR. YAREMA: Object to the form.
3 A Fifth.
4 Q Did you know that at the time she was
5 visiting Mr. Epstein and providing massages, she
6 was under the age of 18?
7 MR. YAREMA: Object to the form.
8 A Fifth.
9 Q Do you recall being introduced to ■
10 by Mr. Epstein?
11 MR. YAREMA: Object to the form.
12 A Fifth.
13 Q Do you recall that Jeffrey Epstein
14 instructed you and ■ to kiss and fondle each
15 other around the breasts and buttocks while
16 massaging him?
17 MR. YAREMA: Object to the form.
18 A Fifth.
19 Q Did you ever see Mr. Epstein use a large
20 vibrator/massager on ■?
21 MR. YAREMA: Object to the form.
22 A Fifth.
23 Q Did Jeffrey Epstein ever ask you to
24 purchase a digital camera for him to give ■?
25 MR. YAREMA: Object to the form.

25 (Pages 94 to 97)

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1 A Fifth.

2 Q Did you know that Jeffrey Epstein gave

3 a digital camera?

4 MR. YAREMA: Object to the form.

5 A Fifth.

6 MS. EZELL: I don't have any other

7 questions. Thank you.

8 MR. GOLDBERGER: You still have your

9 microphone on. You must have something on

10 your mind, Brad.

11 REDIRECT EXAMINATION

12 BY MR. EDWARDS:

13 Q through the whole day

14 you've taken the Fifth on just about every single

15 question. Is there any reason why we should not

16 presume that the answer to these questions would

17 incriminate you?

18 MR. YAREMA: Object to the form.

19 A The Fifth.

20 Q The reason that you have taken the Fifth

21 is because the questions you have been asked

22 would have been answered in the affirmative and

23 you're afraid of prosecution for your

24 involvement, true?

25 MR. GOLDBERGER: Don't answer that

99

1 question. It interferes with the

2 attorney/client relationship that I have

3 with and any discussions she

4 and I may have had would come under that

5 privilege.

6 You can try and dance around that, but

7 I'm simply not going to allow her to answer

8 that question. If you want to bring it up

9 with the Judge, you can.

10 MR. EDWARDS: Thanks, Jack.

11 MR. GOLDBERGER: Okay.

12 THE VIDEOGRAPHER: Off the video record

13 at 1:41 p.m.

14 THE COURT REPORTER: You're ordering

15 this, Brad?

16 MR. EDWARDS: Yes. Copies?

17 MS. EZELL: Yes.

18 MR. YAREMA: Yes.

19 THE COURT REPORTER: And Adam wanted it;

20 is that right?

21 MR. EDWARDS: Yes.

22 (Time noted: 1:45 p.m.)

23

24

25

100

1 THE STATE OF FLORIDA)

2 COUNTY OF PALM BEACH)

3 I, TERRI BECKER, a Registered

4 Professional Reporter and Notary Public for the

5 State of Florida at Large, do hereby certify that

6 I reported the videotaped deposition of

7 the WITNESS, called by the PLAINTIFF

8 in the above-entitled action; that the witness

9 was duly sworn by me; that the foregoing pages,

10 numbered from 1 to 104, inclusive, constitute a

11 true record of the deposition by said witness.

12 I further certify that I am not attorney

13 or counsel of any of the parties, nor a relative

14 or employee of any attorney or counsel connected

15 with the action, nor financially interested in

16 the action.

17 WITNESS MY HAND and official seal in the

18 City of West Palm Beach, County of Palm Beach,

19 State of Florida, this 19th day of April 2010.

20

21  

22 TERRI BECKER, Registered

23 Professional Reporter and

24 Notary Public, State of Florida

25 at Large. My Commission expires

March 13, 2011.

101

1 THE STATE OF FLORIDA)

2 COUNTY OF PALM BEACH)

3

4

5 The foregoing certificate was

6 acknowledged before me this _____

7 day of _____ 2010.

8

9

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15 _____

16 Notary Public, State of Florida.

17 My commission No.

18 Expires March 13, 2011.

19

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25

1 I, [REDACTED], do hereby
2 certify that I have read the foregoing transcript
3 of my deposition given on April 13, 2010; that
4 together with the correction page attached hereto
5 noting changes in form or substance, if any, it
6 is true and correct.

7
8 [REDACTED]

9
10
11
12
13

14 I do hereby certify that the deposition
15 of [REDACTED] was submitted to the witness
16 for reading and signing; that after she had
17 stated to the undersigned Notary Public that she
18 had read and examined her deposition, she signed
19 the same in the presence of the undersigned
20 authority on the ____ day of _____, 2010.

21
22 _____
23
24
25

1 U.S. LEGAL SUPPORT
2 Registered Professional Reporters
3 444 West Railroad Avenue
4 Suite 300
5 West Palm Beach, Florida 33401
6 (561)835-0220

7 April 19, 2010

8 ATTERBURY GOLDBERG, WEISS
9 [REDACTED]

10 ATTENTION: JACK GOLDBERGER, ESQ.

11 In Re: DOE V. EPSTEIN

12 Deposition of: [REDACTED]

13 Dear Mr. Goldberger:
14 Since counsel have agreed that you may
15 have the witness read and sign your copy of the
16 deposition, for your convenience, enclosed
17 herewith you will find an Errata Sheet for the
18 witness' use in entering any changes to the
19 deposition.

20 Thank you for your prompt attention.

21 Cordially yours,
22 U.S. LEGAL SUPPORT

23 _____
24 TERRI BECKER, Registered
25 Professional Reporter, Notary
Public, State of Florida at
Large. My commission expires
March 13, 2011.

CC: Bradley Edwards, Esq.
Adam Horowitz, Esq.
Katherine Ezell, Esq.
David Yarema, Esq.

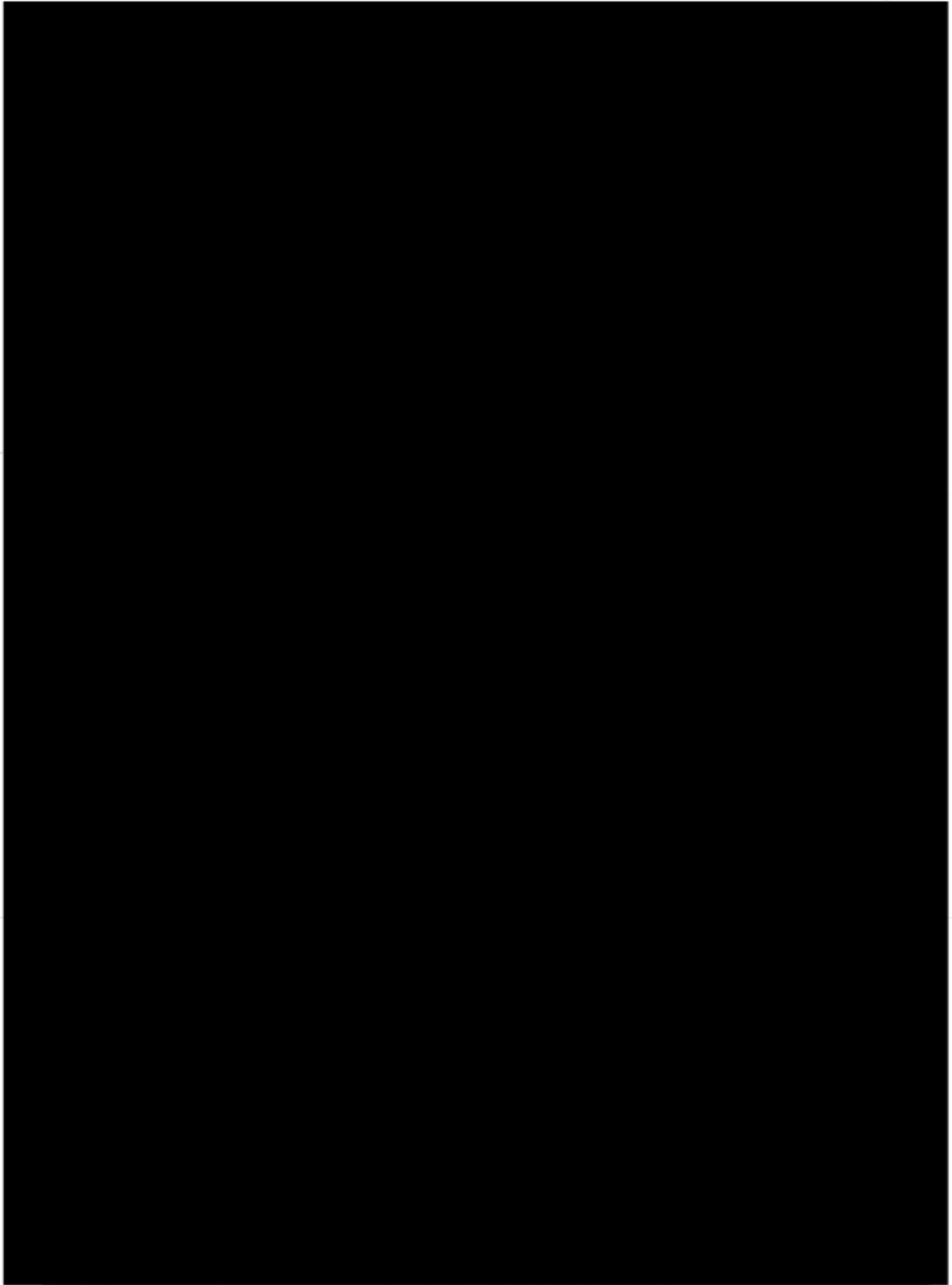
1 ERRATA SHEET
2 In Re: DOE V. EPSTEIN
3 DO NOT WRITE ON TRANSCRIPT
4 ENTER CHANGES HERE:

5 PAGE LINE CHANGE REASON

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

15 [REDACTED]

16
17
18 THE STATE OF FLORIDA)
19 COUNTY OF PALM BEACH)
20 I DO HEREBY CERTIFY THAT [REDACTED]
21 appeared before me and stated that she has read
22 her deposition; further, that this Errata Sheet
23 was signed in my presence on this ____ day
24 of _____ 2010.
25 _____



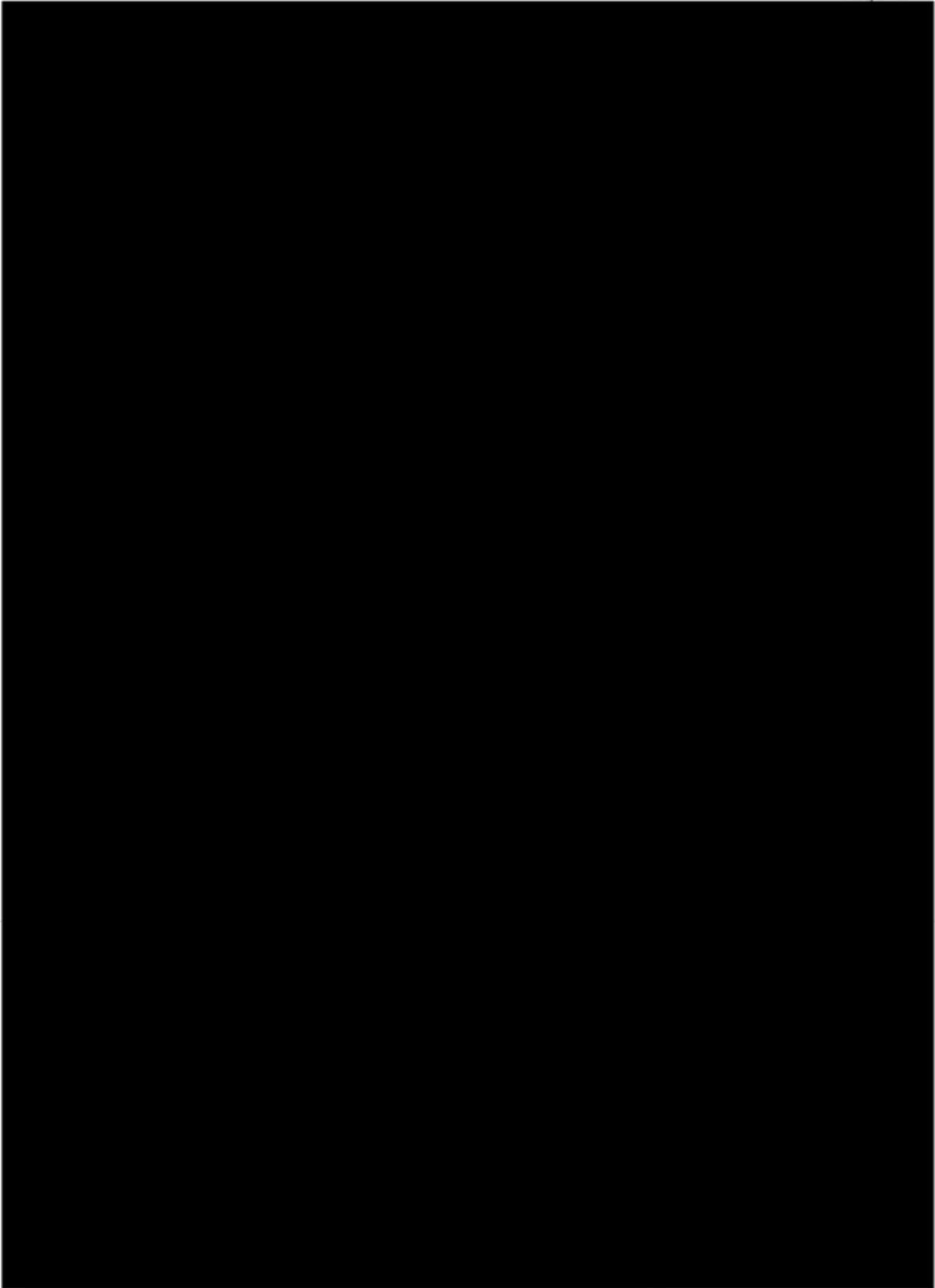
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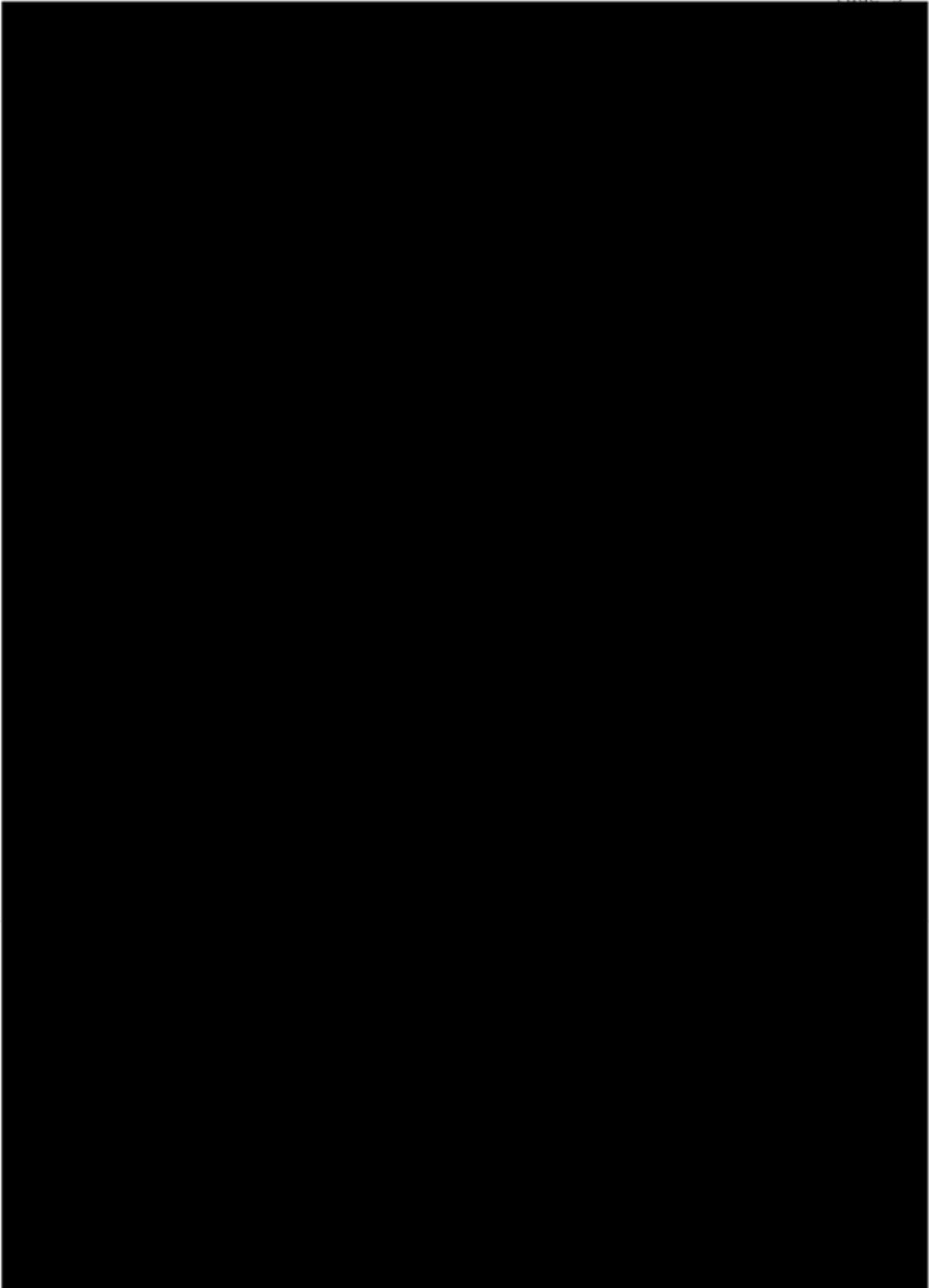
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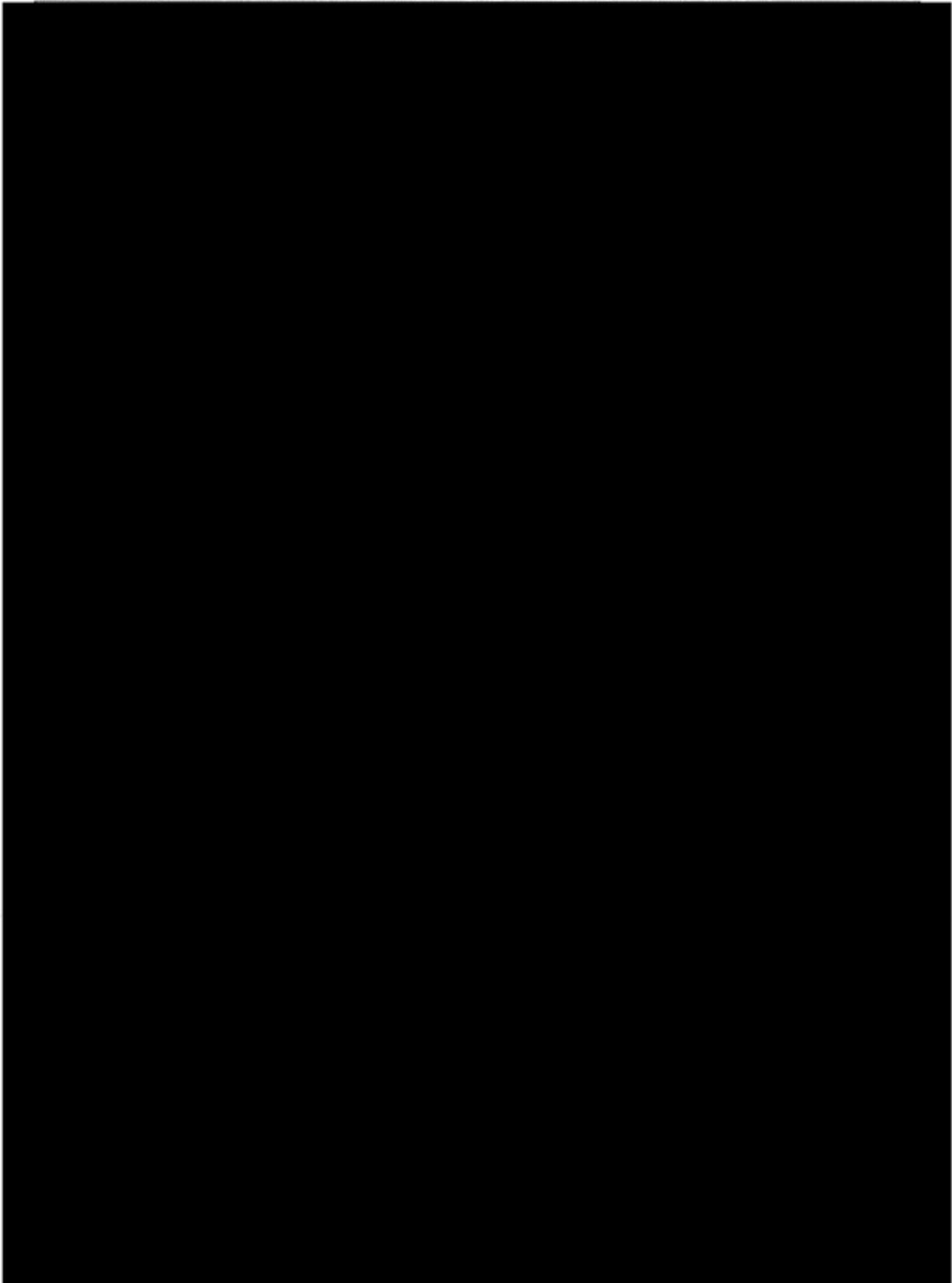
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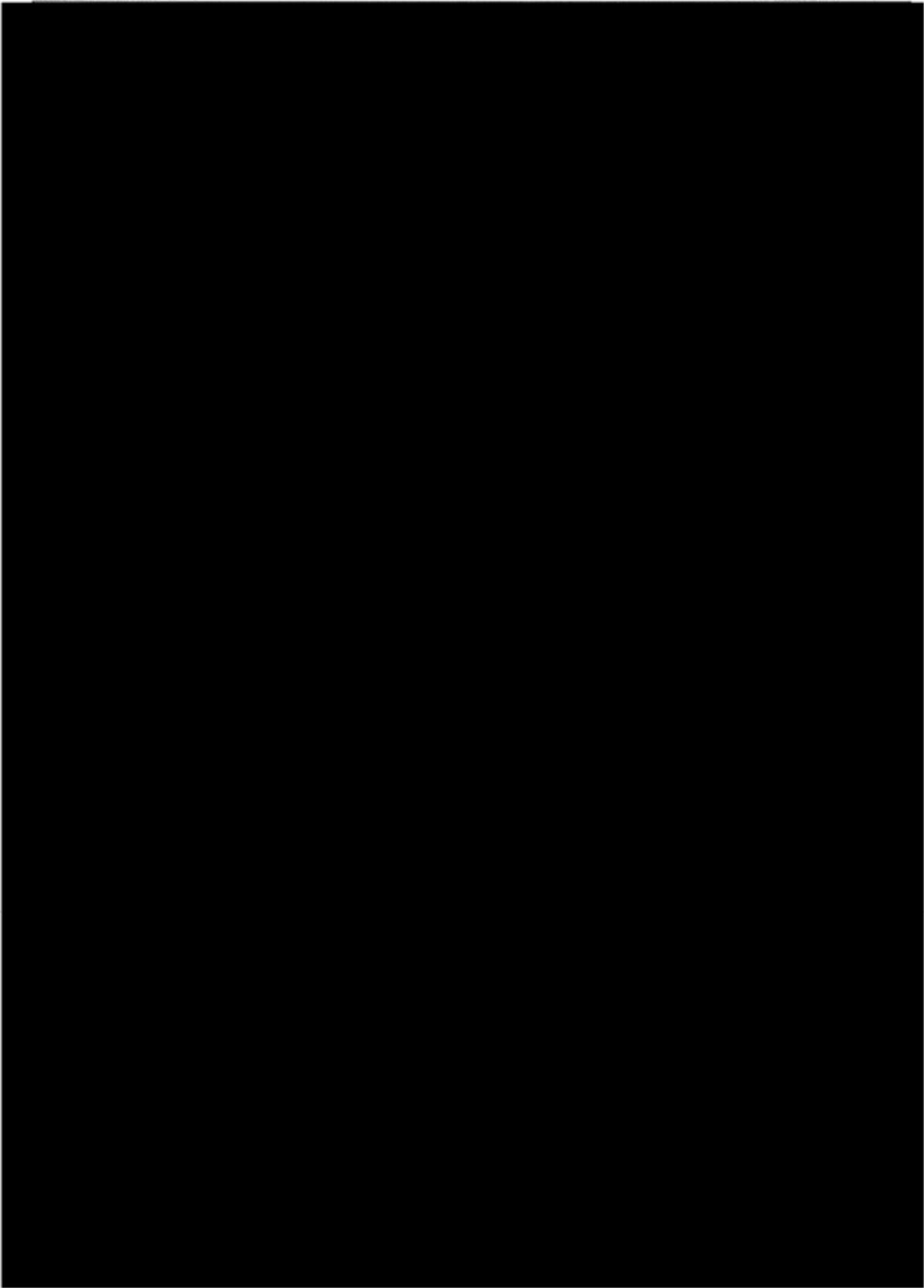
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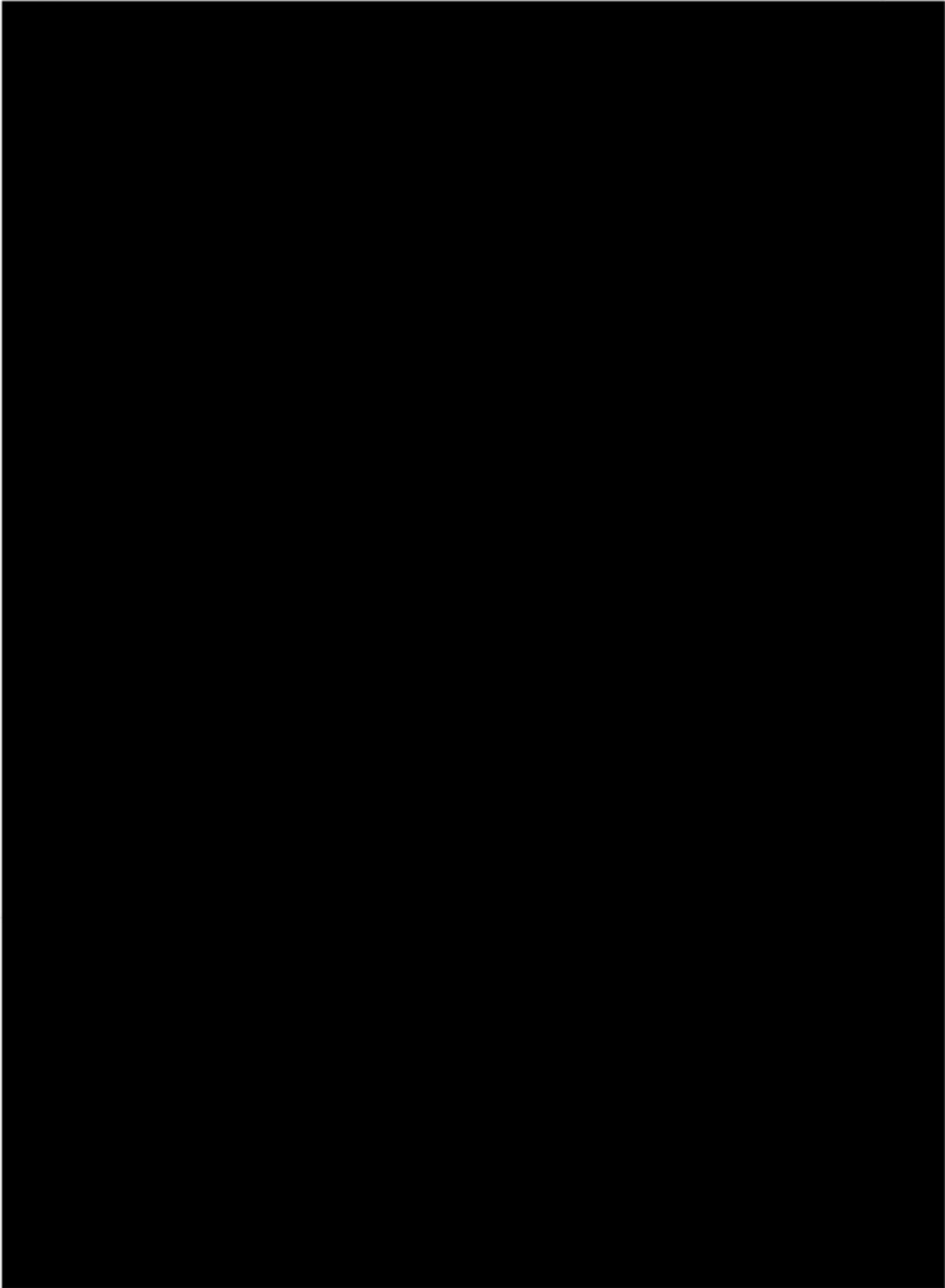
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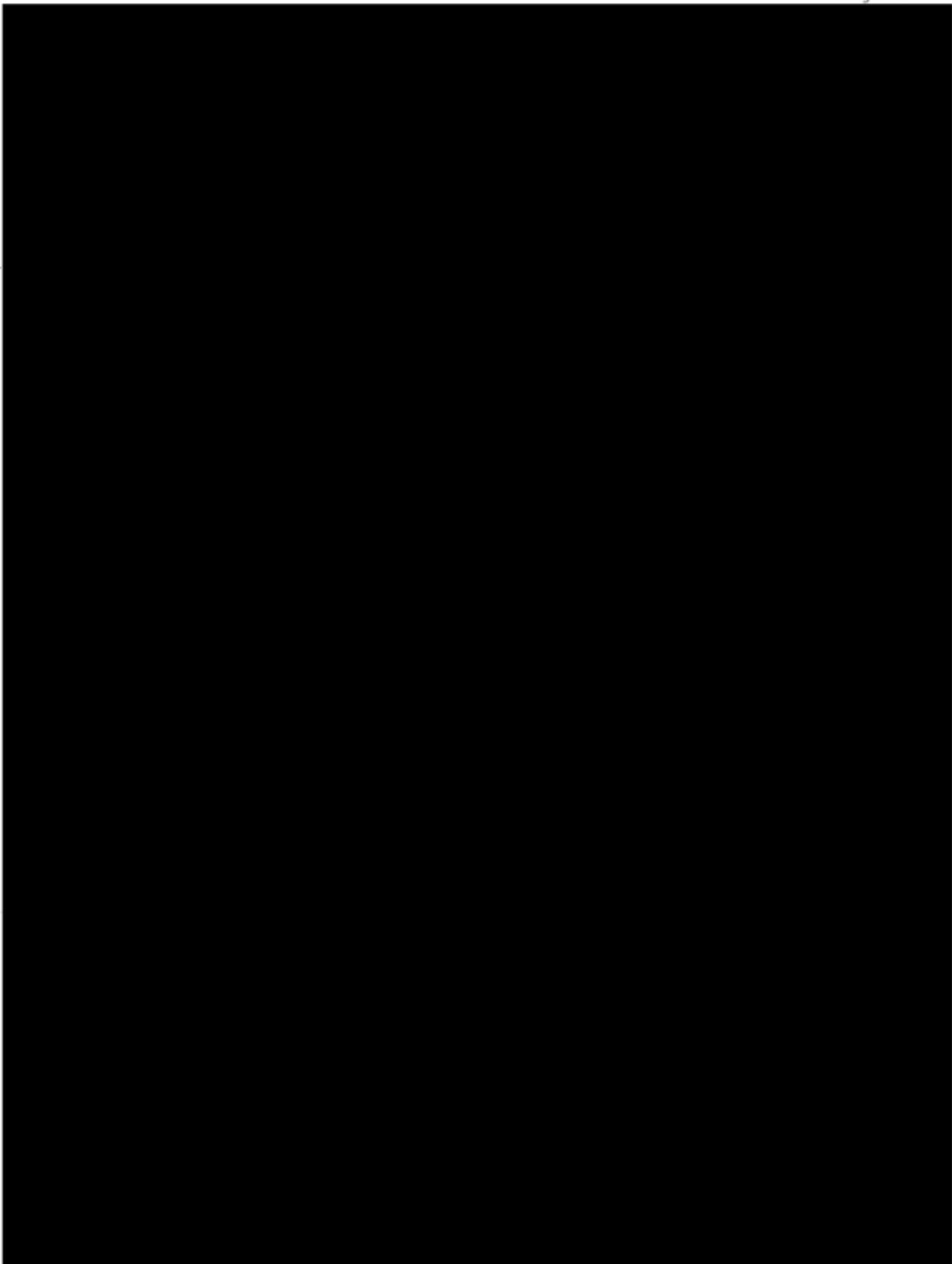
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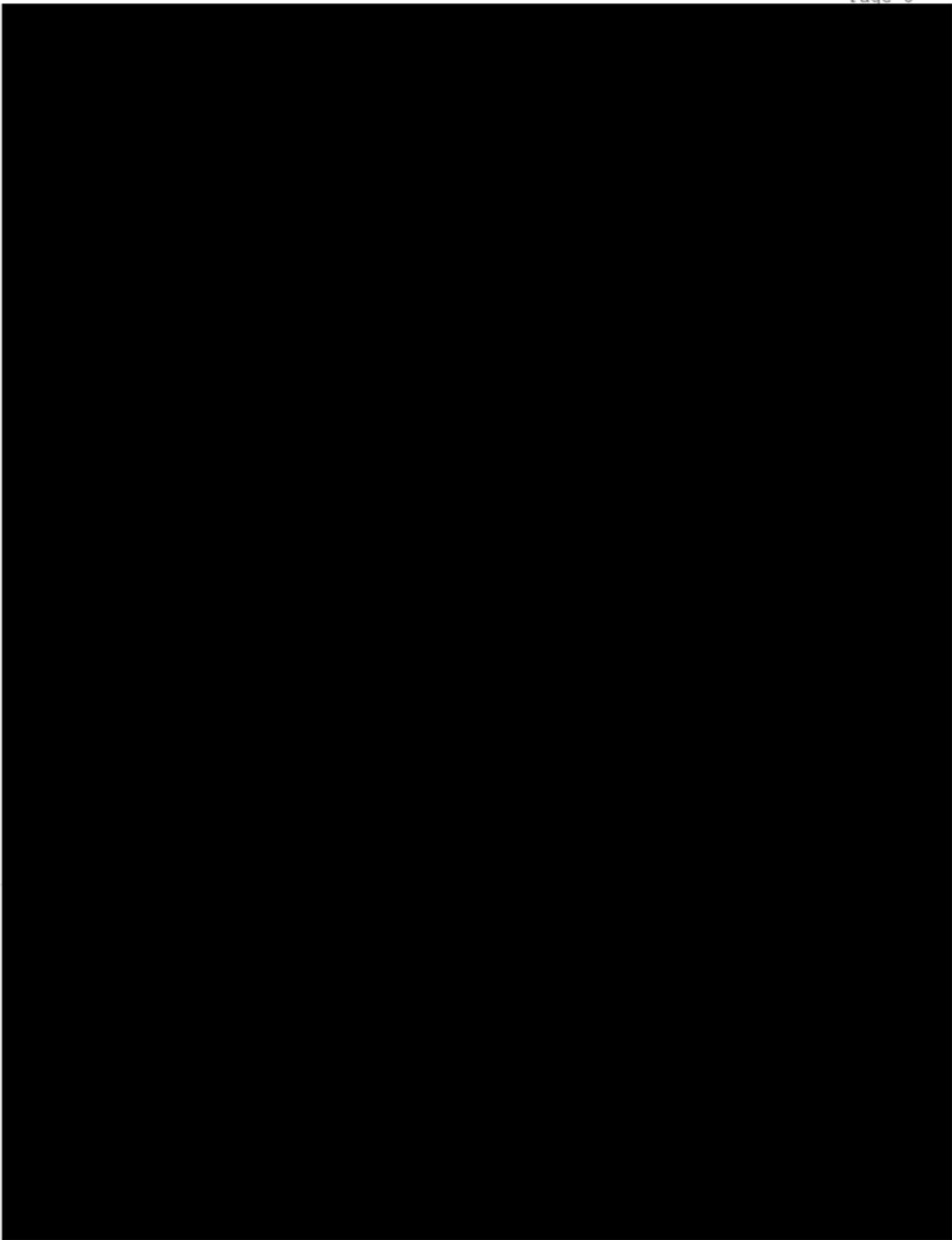
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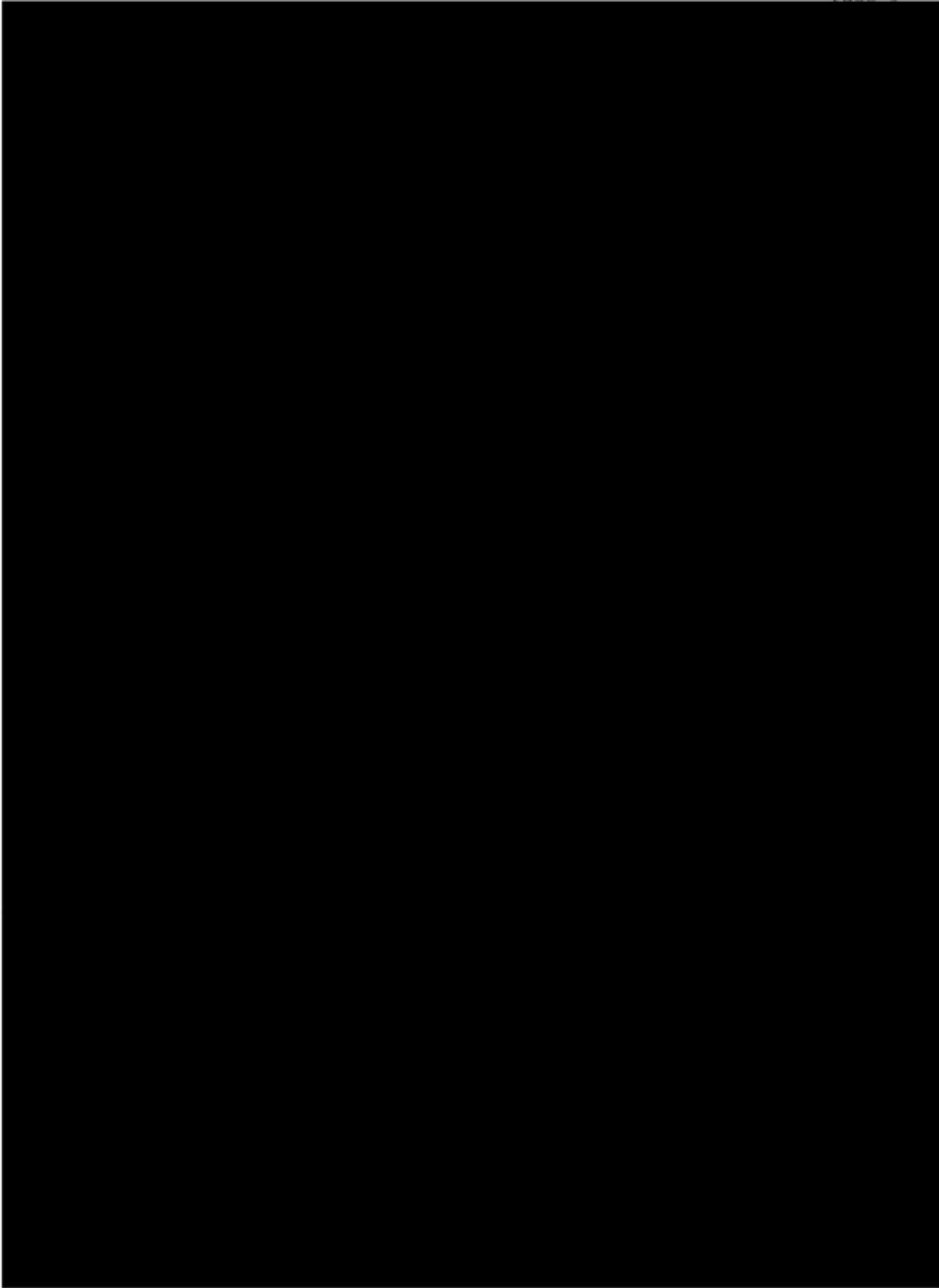
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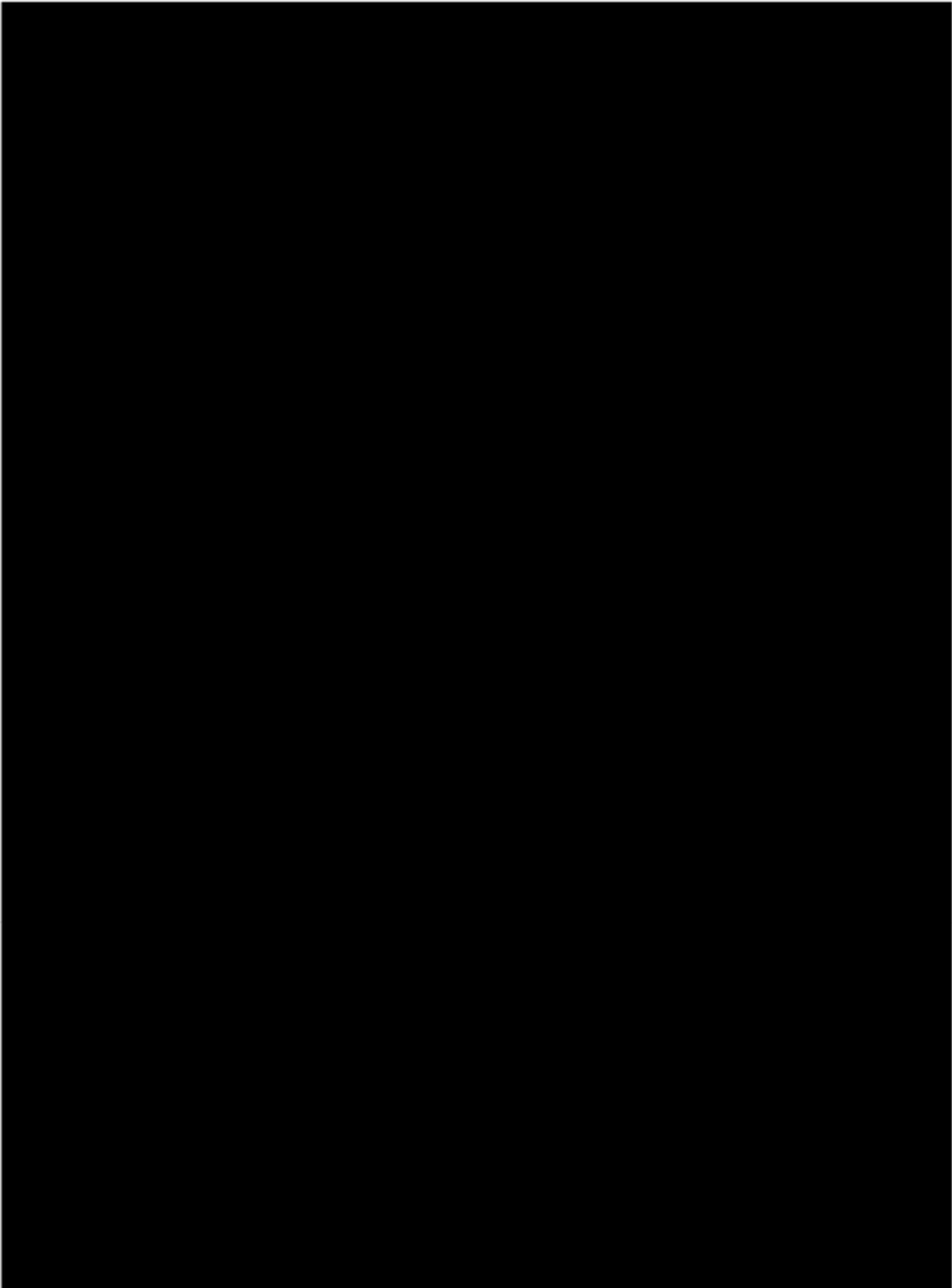
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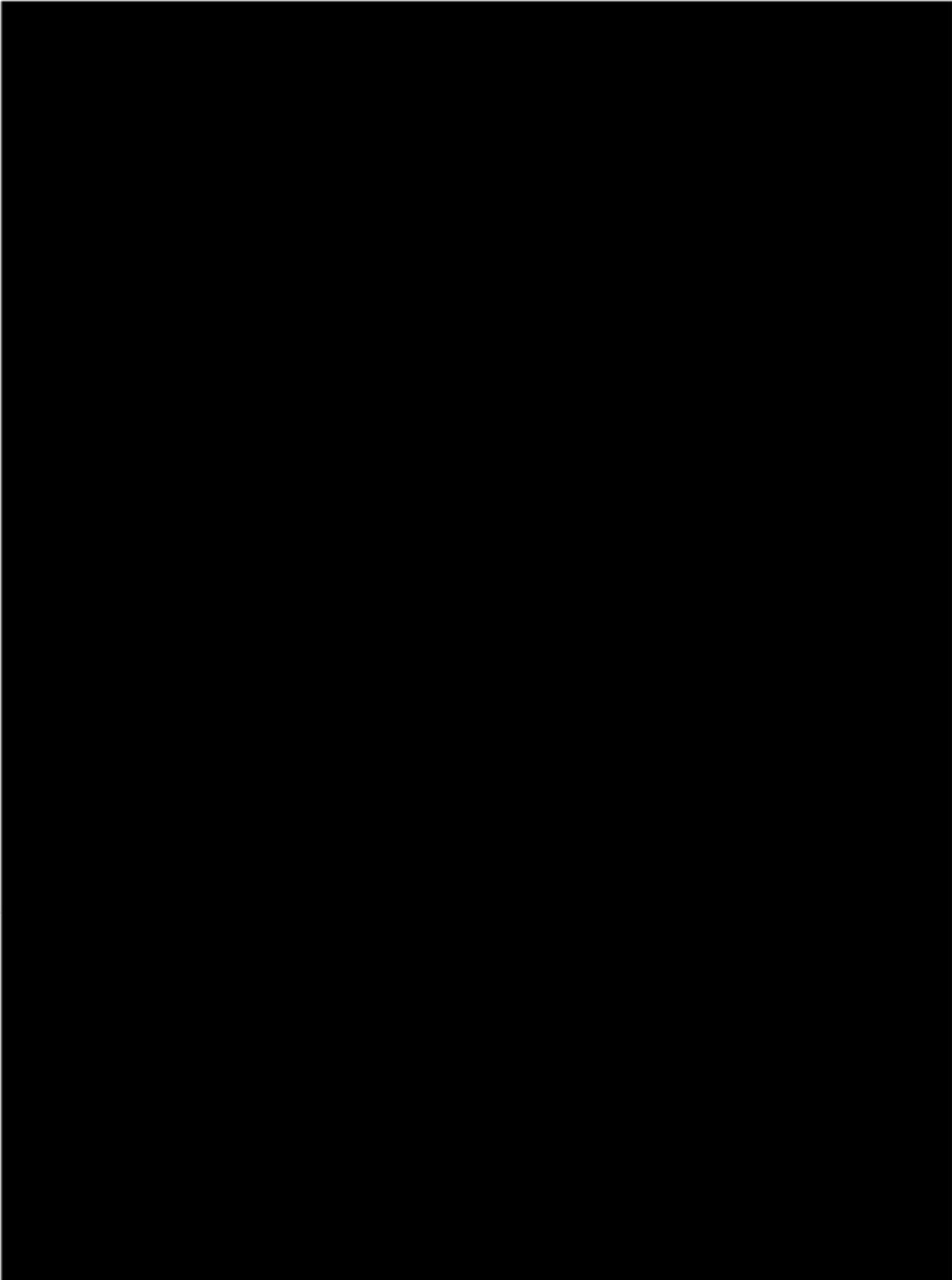
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