

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE No. 502008CA037319XXXXMB AB

█.,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

---

VIDEOTAPED DEPOSITION OF █ █

VOLUME I

Tuesday, November 10, 2009  
11:13 a.m. - 6:12 p.m.

250 S. Australian Avenue  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:  
Sandra W. Townsend, FPR  
PROSE COURT REPORTING AGENCY  
Notary Public, State of Florida  
West Palm Beach Office

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506

Electronically signed by Sandra Townsend (401-377-676-2895)  
Electronically signed by Sandra Townsend (401-377-676-2895)

1f88f113-5663-4dad-94e7-90ffb7174075  
3501.182-102  
Page 1 of 156

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

EFTA\_00094347

EFTA01248007

1 APPEARANCES:

2 On behalf of the Plaintiff [REDACTED].:

3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]

6 On behalf of Plaintiffs [REDACTED]:

7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]

10

11 On behalf of Plaintiff [REDACTED]:

12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]

18 On behalf of the Defendant:

19 ROBERT CRITTON, ESQUIRE  
20 BURMAN, CRITTON, LUTTIER & COLEMAN  
21 515 North Flagler Drive  
22 Suite 400  
23 West Palm Beach, Florida 33401  
24 Phone: 561.842.2820  
25

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 On behalf of the Witness:

2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]

6

7 ALSO PRESENT:

8 MICHAEL DOWNEY, VIDEOGRAPHER  
9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

Electronically signed by Sandra Townsend (401-377-676-2895)  
Electronically signed by Sandra Townsend (401-377-676-2895)

1f88f113-5663-4dad-94e7-90ffb7174075  
3501.182-102  
Page 3 of 156

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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

NUMBER	DESCRIPTION	PAGE
Plaintiff:		
Exhibit number 1	Notebook page	14
Exhibit number 2	Photograph	134
Exhibit number 3	Photograph	137
Exhibit number 4	Photograph	138
Exhibit number 5	Photograph	247
Defendant:		
Exhibit number 1	Transcript	140

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

Electronically signed by Sandra Townsend (401-377-676-2895)  
Electronically signed by Sandra Townsend (401-377-676-2895)

1f88f113-5663-4dad-94e7-90ffb7174075  
3501.182-102  
Page 4 of 156

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

P R O C E E D I N G S

- - -

Deposition taken before Sandra W. Townsend, Court Reporter and Notary Public in and for the State of Florida at Large, in the above cause.

- - -

VIDEOGRAPHER: We're on the video record. This is the 10th day of November, the year 2009. The time is approximately 11:13 a.m.

This is the videotaped deposition of [REDACTED] [REDACTED] in the matter of [REDACTED], Plaintiff, versus Epstein, Defendant.

This deposition is being held at 250 South Australian Avenue, West Palm Beach, Florida.

My name is Michael Downey. I'm the videographer, employed by Visual Evidence.

Would the attorneys please announce their appearances for the record.

MR. [REDACTED]: Yes. [REDACTED] [REDACTED], on behalf of Plaintiff [REDACTED].

MR. [REDACTED]: [REDACTED] [REDACTED] on behalf of Plaintiffs [REDACTED].

MR. [REDACTED]: [REDACTED] [REDACTED], on behalf of [REDACTED] [REDACTED].

MR. CRITTON: Robert Critton, on behalf of

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 Jeffrey Epstein.

2 MS. [REDACTED]: [REDACTED] [REDACTED] and [REDACTED]  
3 [REDACTED], here on behalf of witness, [REDACTED] [REDACTED].

4 THEREUPON,

5 [REDACTED] [REDACTED],  
6 having been first duly sworn or affirmed, was examined  
7 and testified as follows:

8 THE WITNESS: So help me God.

9 MR. CRITTON: Let me just note one thing for  
10 the record, is -- it's been -- this case for this  
11 depo has been noticed both in the State Court case.  
12 It's been noticed as well -- cross noticed by at  
13 least [REDACTED] [REDACTED] on behalf of his clients two  
14 through eight in the Federal Court case. The only  
15 two lawyers who apparently are not here, but they  
16 obviously have notice of it. And Mr. [REDACTED] didn't  
17 notice it, but obviously he's -- cross notice, but  
18 he's here -- Mr. [REDACTED] on behalf of his three  
19 clients, and apparently Mr. Garcia chose, they  
20 chose not to come for whatever reason, but they  
21 would have received notice from everybody.

22 DIRECT EXAMINATION

23 BY MR. [REDACTED]:

24 Q. Good morning.

25 A. Morning.

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 Q. Just want to make sure he was done.

2 I introduced myself in the beginning, but my  
3 name is [REDACTED] [REDACTED]. I represent one of the  
4 Plaintiffs in a lawsuit filed against Mr. Epstein. And  
5 I'm here today to ask you a bunch of questions.

6 As you saw at the beginning, you're under  
7 oath. It's just like you're on the stand at trial,  
8 except there's no Judge here in the room with us. So  
9 when I ask you questions, just give it a breath for a  
10 minute because there may be objections for other lawyers  
11 in the room.

12 Since there's not a Judge here, nobody's going  
13 to rule on those objections, so the lawyer has to put  
14 that objection on the record. Just pause for a minute  
15 and then if you understand the question, go ahead and  
16 answer.

17 The only exception to that rule is, if your  
18 two lawyers look at you and say, don't answer that  
19 question. At that point I don't want you to say a word.  
20 And then they lodge an objection and advise you not to  
21 say anything. Okay?

22 A. Okay.

23 Q. If you do answer a question, there's two  
24 things I'm going to assume. I'm going to assume that  
25 you understood the question being asked and that you're

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1           answering truthfully. Fair enough?

2           A. Yes.

3           Q. If you don't understand any of my questions,  
4 please let me know and I'll be happy to rephrase it  
5 until you can understand it.

6                     It's a nerve-racking procedure and I know  
7 you're nervous. It's delving into very touchy areas, so  
8 it's going to be delicate. I'm going to try and handle  
9 it as respectfully and delicately as possible, but I am  
10 going to have to ask a whole bunch of difficult  
11 questions. Okay? Fair enough?

12          A. Understand.

13          Q. Okay. If you would, could you give us your  
14 full name, please?

15          A. [REDACTED].

16          Q. Where do you currently live?

17          A. [REDACTED]  
[REDACTED]

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

















1

[REDACTED]

2

BY MR. [REDACTED]:

3

[REDACTED]

4

[REDACTED]

5

[REDACTED]

6

[REDACTED]

7

[REDACTED]

8

[REDACTED]

9

[REDACTED]

10

[REDACTED]

11

[REDACTED]

12

[REDACTED]

13

[REDACTED]

14

[REDACTED]

15

[REDACTED]

16

[REDACTED]

17

[REDACTED]

18

[REDACTED]

19

[REDACTED]

20

[REDACTED]

21

[REDACTED]

22

[REDACTED]

23

[REDACTED]

24

[REDACTED]

25

[REDACTED]

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506

Electronically signed by Sandra Townsend (401-377-676-2895)  
Electronically signed by Sandra Townsend (401-377-676-2895)

1f88f113-5663-4dad-94e7-90ffb7174075

3501.182-102

Page 17 of 156

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

EFTA\_00094363

EFTA01248023























█ [REDACTED]

12 BY MR. [REDACTED]:

13 Q. When is the first time that you ever had any  
14 contact with Jeffrey Epstein?

15 A. When?

16 Q. Yes. In other words, what grade were you in  
17 or how old were you? However you can peg the time in  
18 your mind.

19 A. About 16.

20 Q. So would you have been in about tenth grade at  
21 that point?

22 A. Tenth going into my junior year, like, towards  
23 the end, beginning of 11th.

24 Q. And how was it that you came to know who  
25 Jeffrey Epstein was?

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1           A. I was approached by [REDACTED] at [REDACTED]  
[REDACTED].

3           Q. At that point had you just turned 17?

4           A. No.

5           Q. You were still 16 at that point?

6           A. Yes.

7           Q. And [REDACTED], is it [REDACTED]?

8           A. I don't know.

9           Q. Okay. How did you know [REDACTED], if at  
10 all?

11          A. We went to middle school together, but we were  
12 not friends.

[REDACTED]

[REDACTED]

15          Q. Do you know where she is today?

16          A. No.

17          Q. What were you doing at [REDACTED]  
[REDACTED]?

19          A. I don't know.

20          Q. Well, is it a members only type of place?

21          A. No.

22          Q. Do you just --

23                 MR. [REDACTED]: Wait until he finishes his  
24 question.

25          BY MR. [REDACTED]:

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 Q. How do you get in there?

2 A. You walk in.

3 Q. Is there a charge to get into [REDACTED]

4 [REDACTED]?

5 A. Not the day I met [REDACTED], no.

6 Q. Had you been there before?

7 A. Yes.

8 Q. How many times had you been there before?

9 A. I can't recall.

10 Q. Was it a place that you went to regularly at  
11 that point in your life?

12 A. Yes.

13 Q. Why would you go there?

14 A. To go swimming, listen to music.

15 Q. Okay. Can you describe [REDACTED]

16 [REDACTED] to me? I mean, are we talking about a club? Are  
17 we talking about a -- somewhere just on the beach  
18 somewhere? Are we talking about a bar? What is this  
19 place?

20 A. [REDACTED] is a tiki bar on the beach  
21 or was at that point on the beach [REDACTED]. It  
22 had a bar. It had a restaurant. It had a pool. It was  
23 a hotel room. I mean, they had hotel rooms available.  
24 They had on Sundays live music.

25 Q. Okay. When you would go there in the past,

1 would you go with friends?

2 A. Yes.

3 Q. Who?

4 A. [REDACTED]

5 Q. Anyone else you can think of?

6 A. Not that I can think of.

7 Q. Would you go with [REDACTED] or would you go with  
8 [REDACTED]?

9 A. Not [REDACTED]. I did go with [REDACTED] and [REDACTED] at  
10 one point.

11 Q. Okay. When you would go to the beach  
12 resort -- and I'm talking about the day before [REDACTED]  
13 [REDACTED] approaches you now.

14 A. Uh-huh.

15 Q. In the past when you would go there, is it a  
16 place you would go just yourself and with friends or  
17 would your parents take you there?

18 A. Usually a place that I would go with my  
19 friends.

20 Q. Had your parents ever been there before that  
21 day that you talked to [REDACTED]?

22 A. Yes.

23 Q. So they were familiar of the location and had  
24 been there before?

25 A. Uh-huh, yes.

1 Q. And they would also let you go to this place  
2 alone?

3 A. With friends.

4 Q. How would you get there?

5 A. Drive.

6 Q. You?

7 A. Yes.

8 Q. So you would have -- you had a driver's  
9 license at 16?

10 A. Yes.

11 Q. Just going back to what we had asked at the  
12 beginning.

13 Did you have your own car?

14 A. Yes.

15 Q. What kind of car were you driving back then?  
16 Was it the same pickup truck that you had later?

17 A. I don't remember.

█ [REDACTED]  
█ [REDACTED]

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**





1 Q. Would you ever drink there at the [REDACTED]  
2 [REDACTED]

3 MS. [REDACTED]: Objection. I've already  
4 instructed her not to answer this question. You're  
5 just using this example as a back doorway into the  
6 same question. We're still prior to her meeting  
7 [REDACTED]. If you have a specific question  
8 with regard to that day, please go ahead;  
9 otherwise, it's the same objection.

10 MR. [REDACTED]: Okay.

11 BY MR. [REDACTED]:

12 Q. When you would go to the [REDACTED]  
13 [REDACTED] -- don't answer this because she's going to  
14 object -- while you were there prior to that day that  
15 [REDACTED] approached you with Jeffrey Epstein, had  
16 anyone [REDACTED] ever provided you with any  
17 drugs?

18 MS. [REDACTED]: Same objections.

19 MR. CRITTON: Form.

20 MS. [REDACTED]: Do not answer.

21 BY MR. [REDACTED]:

22 Q. Same thing, don't answer this until she  
23 objects, if she's going to object, which she will.  
24 Had [REDACTED] prior to that day ever  
25 provided you with any drugs?

1 MS. [REDACTED]: Same objections.

2 Do not answer.

3 BY MR. [REDACTED]:

4 Q. And by "drugs," I meant, obviously, illegal  
5 drugs or drugs that were not prescribed to you by a  
6 doctor. Okay?

7 MR. [REDACTED]: Same objection?

8 MS. [REDACTED]: Same objection.

9 Do not answer.

10 BY MR. [REDACTED]:

11 Q. All right. When you would go to the [REDACTED]  
12 [REDACTED] [REDACTED] prior to that day that we're going to get  
13 to in a minute, how old were the people that you were  
14 going with?

15 A. My age.

16 Q. All right. Anyone that would go with you that  
17 was older than you, boys or girls?

18 A. Yes.

19 Q. Who?

[REDACTED]  
[REDACTED]  
[REDACTED]

23 Q. Any boys that would go?

24 A. I don't remember.

25 Q. Any boys that would meet you there?

1 A. Don't remember.

2 Q. The times that you went to the [REDACTED]  
3 [REDACTED] can you remember any boys that happened to show  
4 up there or meet you there or hang out with you while  
5 you were there?

6 A. I don't remember.

7 Q. Were there any boys that you socialized with  
8 at that point in your life? Just friends?

9 A. At that point in my life, yes.

10 Q. Who?

11 A. [REDACTED]

12 Q. Hang on one second. [REDACTED], is that  
13 [REDACTED]?

14 A. [REDACTED], I think.

15 Q. And the other name? I'm sorry.

16 A. [REDACTED].

17 Q. Can you spell that last name?

18 A. [REDACTED].

19 Q. Anyone else?

20 A. Not that I can remember.

21 Q. Were [REDACTED] and [REDACTED] about your age?

22 A. No.

23 Q. How old were they?

24 A. This is going back when I was 16?

25 Q. Yep. We're still at that same point in your



1 A. I don't remember.

2 Q. Any boys that you can remember that would come  
3 there your age; in other words, from school that you  
4 knew?

5 A. I can't recall.

6 Q. All right. You had mentioned that [REDACTED]  
7 [REDACTED] you knew, but she wasn't a close friend at that  
8 point, correct?

9 A. Yes.

10 Q. How did you know her, just from school?

11 A. Just from [REDACTED].

12 Q. All right. Had you had her in classes before?  
13 Was she in social activities and you just knew her? How  
14 is it that you knew her?

15 A. I can't remember.

16 Q. Okay. I want you to describe for me and go  
17 back to that day in which she approached you, as best  
18 you can, exactly how that incident happened.

19 A. I was at the [REDACTED] with a couple friends. I  
20 was walking around and me and her were standing and we  
21 were talking. And she had asked me if I wanted to make  
22 any money, what my situation was. We exchanged  
23 information and we went on our separate ways.

24 Q. Okay. Let me ask you just a couple questions  
25 about that.

1                   You said she asked you what your situation  
2                   was. What did you take that to mean?

3                   A. Was I living at home? What was I doing?

4                   Q. Why was she asking you that, if you know?

5                   A. I don't know.

6                   Q. Did you tell her?

7                   A. I can't recall.

8                   Q. Do you know what she -- did you know what she  
9                   meant when she asked you whether you wanted to make some  
10                  money? In other words, did she explain what she meant  
11                  to you?

12                  A. Yes.

13                  Q. What did she say?

14                  A. She said she had a friend who was a  
15                  billionaire in Palm Beach and if I gave massages, he  
16                  would pay me.

17                  Q. All right. So she, in fact, did explain to  
18                  you that this person wanted a massage?

19                  A. That's correct.

20                  Q. Did [REDACTED] explain to you whether or not  
21                  you would have to get undressed for the massage?

22                  A. She never -- she never said that.

23                  Q. Did [REDACTED] express to you or explain to  
24                  you in any way that the person or billionaire that you'd  
25                  be massaging would be in any state of undress; in other

1 words, in his underwear? Naked? Was that discussed?

2 A. No.

3 Q. What did you respond when she explained this  
4 to you? What did you say to her?

5 A. I can't recall.

6 Q. Did you say anything to incline or to make her  
7 think that you would be interested in any way?

8 A. I exchanged information with her.

9 Q. When you say you exchanged information, was it  
10 your phone number?

11 A. Yes.

12 Q. Did you give her anything other than your  
13 phone number?

14 A. I don't remember.

15 Q. Was that your cell phone that you gave her?

16 A. Yes.

17 Q. Not your home phone, correct?

18 A. That's correct.

19 Q. And your cell phone at the time, if I'm  
20 correct, was [REDACTED]?

21 A. I don't remember.

2 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

██████████  
Q. That number that I just said to you though,  
██████████, doesn't sound familiar to you?

A. It sounds familiar.

Q. Okay. With respect to the phone number that  
you gave her, did you tell her to call you at any  
particular time or make any arrangements for a phone  
call or appointment at that point?

A. I can't remember.

Q. When is the first time that you talked to her  
again about this issue; in other words, the billionaire  
friend that she had on Palm Beach?

A. I don't remember.

Q. How soon after that first meeting did you talk  
to ██████████ again?

A. I don't remember.

Q. Was it years later? Months later? Days  
later? Weeks later?

A. Days later.

Q. Does she call you or do you call her?

A. I don't remember.

Q. What type of conversation -- tell me generally  
what you all spoke about when you spoke again on the  
phone.

A. I don't remember.

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

Electronically signed by Sandra Townsend (401-377-676-2895)  
Electronically signed by Sandra Townsend (401-377-676-2895)

1f88f113-5663-4dad-94e7-90ffb7174075  
3501.182-102  
Page 43 of 156

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

EFTA\_00094389

EFTA01248049

1 Q. Did you make an appointment to go meet or go  
2 over to Mr. [REDACTED] home?

3 A. Yes.

4 Q. And what was your understanding of what you  
5 were going to be doing when you went there?

6 A. Can you repeat the question?

7 Q. Sure. When you have that phone  
8 conversation -- this is after the in-person meeting you  
9 have with [REDACTED] -- let me ask it this way: Did  
10 she give you any more information in the phone call  
11 about what the job was going to entail?

12 A. I can't remember.

13 Q. Did she tell you at that point whether you  
14 were going to have to get undressed at all?

15 A. I don't remember.

16 Q. Did she tell you at that conversation on the  
17 phone whether or not the billionaire Palm Beach  
18 gentleman would be undressed?

19 A. I don't remember.

20 Q. Did she give you his name in the phone call or  
21 in the in-person first meeting?

22 A. Yes.

23 Q. When did she tell you his name?

24 A. I don't remember.

25 Q. Was it either in the face-to-face you had at

1 the [REDACTED] or the phone call?

2 A. Yes.

3 Q. And what name did she give you?

4 A. Jeffrey.

5 Q. Did she tell you his last name?

6 A. At that point, no.

7 Q. All right. So now you have this phone call.

8 Do you arrange a time to go over there for this massage?

9 A. I can't remember.

10 Q. When is the first time that you went to  
11 Mr. Epstein's home for a massage?

12 A. First time was when I was a junior in high  
13 school.

14 Q. How long a period of time after that first  
15 meeting you had with [REDACTED] was it that you first  
16 went over there? Are we talking weeks? Days? Months?

17 A. Wait. Can you repeat that?

18 Q. Sure. I'm trying to figure out -- you have  
19 the face-to-face with [REDACTED]. That's the first  
20 time she mentions this whole thing with Jeffrey Epstein?

21 A. Uh-huh.

22 Q. Yes?

23 A. Yes.

24 Q. Then you have a phone call to follow up  
25 because you had given her the information, correct?

1 A. (Nods head.)

2 Q. Yes?

3 A. Yes.

4 Q. Okay. And that was within days of the first  
5 meeting?

6 A. Yes.

7 Q. Okay. I assume at that phone call -- and  
8 correct me if I'm wrong -- that during the phone call  
9 there was some arrangement made for you to go over  
10 there?

11 A. Yes.

12 Q. Okay. I'm trying to figure out how soon after  
13 the phone call it was that you were to go over there.  
14 Days? Weeks? Months?

15 A. Days.

16 Q. Okay. So within days of the in-face meeting  
17 you have a phone call and you were supposed to go over  
18 to the house days after, some amount of days after the  
19 phone call, yes?

20 A. Yes.

21 Q. Got you. Was anyone going to go with you that  
22 first time?

23 A. Yes.

24 Q. Who?

25 A. Me, [REDACTED] or [REDACTED] and Tony

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1           Figueroa.

2           Q.   Who is Tony Figueroa?

3           A.   Tony Figueroa is [REDACTED]'s friend.

4           MS. [REDACTED]: [REDACTED], as soon as you're at a  
5           good stopping point, --

6           MR. [REDACTED]: Sure.

7           MS. [REDACTED]: -- just get a quick restroom  
8           break?

9           MR. [REDACTED]: Absolutely. Right now.

10          MS. [REDACTED]: You good?

11          MR. [REDACTED]: Yep.

12          VIDEOGRAPHER: Go off the record. The time is  
13          five minutes to 12:00 p.m.

14          (Brief recess.)

15          VIDEOGRAPHER: We're back on the video record.  
16          The time is 12:02 p.m.

17          BY MR. [REDACTED]

18          Q.   Okay. We left off the first time you were  
19          going over to Mr. Epstein's house and you mentioned that  
20          Tony Figueroa and [REDACTED] were going to go with  
21          you?

22          A.   Yes.

23          Q.   Okay. How did you know Tony or did you know  
24          Tony before that day?

25          A.   I did not know him before that day.

1 Q. So the day you were going over to  
2 Mr. Epstein's house was the first time you had ever met  
3 him?

4 A. That's correct.

5 Q. How old was Tony, if you know?

6 A. I don't know.

7 Q. Was he older than you?

8 A. Yes.

9 Q. Did he appear to be in his late teens or  
10 twenties or is he somebody that was much older, like in  
11 their thirties or forties?

12 A. Late teens, early twenties.

13 Q. And you said that Tony was [REDACTED]  
14 friend?

15 A. Yes.

16 Q. Did you talk to Tony when you first met him  
17 that day?

18 A. I can't remember.

19 Q. Did you have any conversations with him about  
20 where you all were going or what you were going to be  
21 doing that day?

22 A. Yes.

23 Q. Tell me about those.

24 A. When we were all together, we did talk about  
25 where we were going and what we were doing.

1 Q. Uh-huh.

2 A. He didn't say anything out of the normal that  
3 [REDACTED] hadn't discussed with me prior.

4 Q. Okay. So Tony mentioned that you were going  
5 to Mr. Epstein's home?

6 A. That's correct.

7 Q. Or Jeffrey's home?

8 A. Jeffrey's.

9 Q. Did Tony mention to you at that point that you  
10 were going to have to give a massage?

11 A. Yes.

12 Q. Did he mention anything about having to get  
13 undressed?

14 A. No.

15 Q. Did Tony mention anything about whether or not  
16 Jeffrey would be undressed or not?

17 A. No.

18 Q. I think I know the answer to this question.  
19 Had you had any training in giving massages prior to  
20 this day?

21 MR. CRITTON: Form.

22 THE WITNESS: No.

23 BY MR. [REDACTED]:

24 Q. No professional training?

25 A. No.

1 Q. Never gone to school for anything like that?

2 A. No.

3 Q. Even to this day?

4 A. No.

5 MR. [REDACTED]: No, not to this day?

6 BY MR. [REDACTED]:

7 Q. Still have not had any training in massages to  
8 this day?

9 A. No.

10 Q. All right. So who drives? Was it [REDACTED]

11 [REDACTED] Tony?

12 A. I drove.

13 Q. In the pickup?

14 A. I can't remember.

15 Q. Did you go and get them or did they come over  
16 to your house and you left from your house?

17 A. I picked them up.

18 Q. Where did you tell your parents you were  
19 going?

20 A. I don't remember.

21 Q. Was that first time during a weekend or during  
22 a weekday?

23 A. I don't remember.

24 Q. Was it during the summertime when you were out  
25 from school or was it during the school time?

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 A. I don't remember.

2 Q. You're doing just fine. And I'm going to ask  
3 a lot of things you probably don't remember, so you just  
4 tell me and that's a perfectly good answer. Okay?

5 What you do remember though is, it was Tony,  
6 [REDACTED] and yourself, you were driving and this was  
7 the first time that you were going to go to Jeffrey's  
8 house?

9 A. Yes.

10 Q. All right. Were you nervous?

11 A. I don't remember.

12 Q. Did you have any expectations of what might  
13 take place when you went; in other words, did you think  
14 that there might be something more than what [REDACTED]  
15 [REDACTED] and Tony may have told you?

16 MR. CRITTON: Form.

17 BY MR. [REDACTED]:

18 Q. You can answer.

19 A. Can you repeat the question?

20 Q. Sure. [REDACTED] And Tony told you that you  
21 were going to have to give a massage, correct?

22 A. Yes.

23 Q. To an older man that lived on Palm Beach?

24 A. Yes.

25 Q. All right. Did you think there might be a

1 little more to it at that point than just a massage?

2 MR. CRITTON: Form.

3 THE WITNESS: I don't remember.

4 BY MR. [REDACTED]:

5 Q. How did you know how to get to the house where  
6 you were going?

7 A. [REDACTED] And Tony were with me. They gave  
8 me directions.

9 Q. Okay. Describe for me, if you remember, how  
10 you got there; in other words, did you go over the north  
11 bridge? South bridge?

12 A. I don't recall what bridge.

13 Q. When you pulled up to the house for the first  
14 time, can you describe for me what you recall it looking  
15 like?

16 A. There was a driveway, landscape. I want to  
17 say it was a pink color, like, a pinkish color. It was  
18 huge. A lot of cars in the driveway.

19 Q. Through road? Dead end?

20 A. It was a dead road, dead end.

21 Q. You said there were a lot of cars in the  
22 driveway?

23 A. (Nods head.)

24 Q. What kind of cars, if you remember?

25 A. I can recall black. That's all.

1 Q. Do you remember seeing an Escalade?

2 A. I don't remember.

3 Q. Okay. That's fine. Anyone meet you at the  
4 front of the house? Security? Anything like that?

5 A. No.

6 Q. Describe for me what happened when you  
7 arrived, as best you can recall.

8 A. As best as I can recall, Tony, [REDACTED]  
9 and I walked to the side of the house, kind of around  
10 the back, to a door where somebody had opened it for us  
11 and it led into the kitchen.

12 Q. Okay. You said the door was already opened.  
13 Does that mean that it was unlocked or that it was  
14 physically open?

15 A. No. Somebody had opened the door, like, met  
16 us at the door and opened it for us.

17 Q. Got you. That person that met you at the  
18 door, woman or man?

19 A. I can't remember.

20 Q. Do you remember if it was the cook?

21 A. No, I do not.

22 Q. Did you all call ahead; in other words, did  
23 somebody, either Tony or [REDACTED], call ahead on the  
24 way and say, hey, we're almost there or anything like  
25 that?

1 A. I don't remember.

2 Q. Okay. Tell me what happens next. So somebody  
3 opens the door for you?

4 A. Somebody opens the door. From what I can  
5 recall, we're all, you know, in the kitchen.

6 And then I had ended up upstairs. I'm not  
7 sure how I ended up there.

8 Q. Okay. Was there a staircase leading upstairs  
9 from the kitchen?

10 A. From the kitchen? No.

11 Q. How would you get upstairs after entering the  
12 kitchen? What different ways are there to get upstairs,  
13 if you know?

14 A. You would walk through the kitchen, kind of  
15 straight into another room. I don't recall if it was a  
16 living room or what. And then kind of make a right.  
17 And then it would lead upstairs and it would go kind of  
18 around.

19 Q. Uh-huh. All right. The staircase leading up  
20 that you just described, the one closest to the kitchen,  
21 narrow staircase? Wide staircase?

22 MR. CRITTON: Form.

23 BY MR. [REDACTED]:

24 Q. How would you describe it?

25 A. I don't remember.

1 Q. Was the staircase open on both sides? Was  
2 there a wall on one side? A wall on both sides? A  
3 railing on one side, a wall on the other? How would you  
4 describe it?

5 A. It was, like, three steps and then there was a  
6 staircase that went one way and the other one kind of  
7 opened up to another direction.

8 Q. All right. Do you know where each side went?  
9 Do you know where each side of the staircase went?

10 A. Not each side, no.

11 Q. Where did the right side go to?

12 A. I don't know.

13 Q. Do you know where the left side went to?

14 A. No.

15 Q. Somehow though you ended upstairs?

16 A. Yes.

17 Q. And was anyone up there with you?

18 A. [REDACTED].

19 Q. Had you ever met her before?

20 A. Prior to that day, no.

21 Q. So this was the first time that you had met

22 [REDACTED]?

23 A. Yes.

24 Q. And just so we're clear, we're talking about

25 [REDACTED] [REDACTED], correct?

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 A. Yes.

2 Q. What did [REDACTED] say to you when you first met?

3 A. I don't remember.

4 Q. What did you all talk about?

5 A. I don't remember.

6 Q. Did she talk to you about what you were about  
7 to do?

8 MR. CRITTON: Form.

9 BY MR. [REDACTED]:

10 Q. In other words, did she discuss anything about  
11 the massage to you?

12 MR. CRITTON: Form.

13 THE WITNESS: I can't remember.

14 BY MR. [REDACTED]:

15 Q. Did you have any conversation with her that  
16 first day?

17 A. I don't remember.

18 Q. That's fine.

19 When you get upstairs, you see [REDACTED] [REDACTED].

20 Is anyone else with you? In other words, where is [REDACTED]

21 [REDACTED]? Where is Tony?

22 A. Downstairs in the kitchen.

23 Q. So they didn't go up with you?

24 A. Not that I remember, no.

25 Q. Prior to this day had you known whether or not

1 [REDACTED] had gone through this before; in other  
2 words, whether [REDACTED] had come over to this house  
3 and done this type of thing in the past?

4 A. No.

5 Q. You didn't know?

6 A. No.

7 Q. Okay. When you get upstairs in this home, are  
8 you nervous?

9 A. I can't remember.

10 Q. What did you do next?

11 A. After I was upstairs?

12 Q. Yes.

13 A. Fixed the massage table.

14 Q. How did you know how to do that?

15 A. I was shown.

16 Q. By?

17 A. [REDACTED].

18 Q. Okay.

19 A. And I was shown where the towels were and the  
20 oils. And then [REDACTED] left.

21 Q. Where were the towels and oils kept?

22 A. Towels, I don't remember. Oils were kept in a  
23 bottom drawer in the massage room area.

24 Q. Where is the massage room in relationship to  
25 where you first were when you remember being upstairs?

1 A. I don't understand the question.

2 Q. Sure. The first thing you remembered when you  
3 got to the house after going through the kitchen is  
4 being upstairs?

5 A. Uh-huh.

6 Q. Okay? I'm wondering, as you're upstairs,  
7 where is the massage room in relationship to that?

8 A. In a bedroom in a steam room.

9 Q. Okay. How big is this area, this massage room  
10 area?

11 A. Maybe half this size.

12 Q. Okay.

13 A. Big.

14 Q. It's a big room?

15 A. It's a big room.

16 Q. Size of maybe an average bedroom?

17 MR. CRITTON: Form.

18 THE WITNESS: Yes.

19 BY MR. [REDACTED]:

20 Q. What's in that room?

21 A. A shower, a steam room, a closet of some sort,  
22 sinks.

23 Q. Okay. Some kind of a dresser with drawers?

24 A. Maybe. I can't be sure.

25 Q. You mentioned the oils were in a bottom

1 drawer?

2 A. Uh-huh.

3 Q. What type of --

4 A. It was a tall -- it was tall with several  
5 drawers against a wall.

6 Q. Okay. How close was that to the table, the  
7 massage table?

8 A. Close.

9 Q. Okay. Did you have to actually set the  
10 massage table up with [REDACTED] or was it already set up  
11 when you walked in?

12 A. She showed me how to set it up.

13 Q. So it was folded up and you all had to unfold  
14 it and set it up?

15 A. Yes.

16 Q. When you set it up, was there a certain  
17 procedure that [REDACTED] showed you; in other words, how it  
18 needed to be done?

19 A. Yes.

20 Q. Tell us about that.

21 A. You would have to pull out the massage table  
22 from the closet that it was kept in. You would  
23 straighten out the legs, just put it to where the  
24 cushions are facing the roof. And two big towels, one  
25 would go on one cushion and the other big towel would be

1 unfolded on the other cushion, kind of like a  
2 tablecloth.

3 Q. And after that she showed you where the oils  
4 were?

5 A. Yes.

6 Q. What type of oils are we talking about?

7 A. I can't remember.

8 Q. Clear? Are they lotion, like, white-colored  
9 oils? I mean, what did the bottles look like? Square?  
10 Circular? Anything like that? Can you remember any of  
11 the names on them? Anything at all that you can tell us  
12 about them?

13 A. I can't recall.

14 Q. You can't recall anything about them, color or  
15 nothing?

16 A. I can't recall anything about the lotions or  
17 oils.

18 Q. But they were kept in a bottom drawer?

19 A. That's correct.

20 Q. Was there anything else that you saw in the  
21 bottom drawer when she got out the oils for you that  
22 first time?

23 A. Yes.

24 Q. What did you see?

25 A. Massager.

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 Q. Can you describe it for me?

2 A. It was big. I want to say it was a pinkish  
3 color.

4 Q. When you say, "it was big," we're on video so  
5 you can actually show us with your hands. What are we  
6 talking about in size here?

7 A. Size, about that long (indicating).

8 Q. Okay. And shape?

9 A. I wouldn't really know how to describe the  
10 shape.

11 Q. Tubular?

12 MR. CRITTON: Form.

13 BY MR. [REDACTED]:

14 Q. Like a bottle?

15 A. Similar to a bottle.

16 Q. Did it resemble a part of the human anatomy at  
17 all?

18 A. Yes.

19 Q. Did it resemble a part of the male anatomy?

20 A. Yes.

21 Q. Sorry I got to ask you, but did it resemble a  
22 man's penis?

23 A. Yes.

24 Q. And did it have a plug attached to it?

25 A. I can't remember.

1 Q. Do you know what I mean when I say, "a plug?"  
2 In other words, was it one that would plug in or was it  
3 battery operated, if you know?

4 A. I don't know.

5 Q. But, nonetheless, you saw that in the drawer  
6 with the oils?

7 A. Yes.

8 Q. Did you see any other massage devices in that  
9 drawer with the oils at that point?

10 A. No.

11 Q. Okay. What did you think when you saw that?

12 A. I don't remember.

13 Q. At this point after you've set up the massage  
14 table, she shows you the oils and you see that type of  
15 thing in the drawer, are you nervous now?

16 A. I don't remember.

17 Q. What happens next?

18 A. Jeffrey walks in the room.

19 Q. Describe him for me that first time that you  
20 saw him.

21 A. I don't remember.

22 Q. Was he fully clothed?

23 A. I can't remember.

24 Q. What happens when he walks in?

25 A. He walks in, introduces himself, lays on the

1 table.

2 Q. When he lays on the table, was he undressed?

3 A. He's covered.

4 Q. Okay. When you say, "covered," are you  
5 talking from the waist down covered?

6 A. Yes.

7 Q. One towel? Big towel? Small towel? How is  
8 he covered?

9 A. A towel. I don't know the size.

10 Q. Okay. Could you still see his legs?

11 A. Yes.

12 Q. And does [REDACTED] leave the room at this point?

13 A. Yes.

14 Q. What happens next?

15 A. I start giving him a massage.

16 Q. Are you clothed?

17 A. Yes.

18 Q. Before [REDACTED] leaves, does she discuss anything  
19 with you about your clothes; in other words, taking them  
20 off, leaving them on, anything like that?

21 A. No.

22 Q. When Mr. Epstein comes in the room for the  
23 first time that time, does he say anything to you other  
24 than hello?

25 A. No.

1 Q. Does he discuss with you before he lays down  
2 anything about your clothing?

3 A. Not that I can remember.

4 Q. At this point you're 16 years old?

5 A. Yes.

6 Q. Or 15?

7 A. Sixteen.

8 Q. You're in a bathroom alone with a man who's  
9 got a towel over himself and you're giving him a  
10 massage.

11 (Brief interruption.)

12 BY MR. [REDACTED]:

13 Q. Sorry for the interruption.

14 At this point you're 16. You're in a bathroom  
15 alone with a man you'd never met before who's  
16 essentially naked but for a towel and you're giving him  
17 a massage. Are you nervous?

18 A. I don't know.

19 Q. What happens next?

20 A. I start massaging him. We're talking,  
21 conversating.

22 Q. About what?

23 A. Life.

24 Q. Like?

25 A. School, family.

1 Q. Did you tell him you were in high school?

2 MR. CRITTON: Form.

3 THE WITNESS: No.

4 BY MR. [REDACTED]:

5 Q. You were talking about school. What are you  
6 talking about?

7 A. I didn't specify.

8 Q. At that point does he ask you how old you are?

9 A. No. I voluntarily tell him I'm 18.

10 Q. You told him at that point?

11 A. Yes.

12 Q. And that was obviously not true?

13 A. That was not true.

14 Q. What happens next?

15 A. We're still massaging. I'm still conversating  
16 with him.

17 Q. Okay. Next?

18 A. I'm sorry. Next, my skirt comes off and I'm  
19 still clothed, but I'm in my thong giving him a massage.  
20 He tries to touch me. I refuse and I don't let it  
21 happen. And then the massage ends and before it ends,  
22 he -- he masturbates.

23 Q. While you're still in the room?

24 A. Yes.

25 Q. Does he take the towel off to do this?

1 A. Yes.

2 Q. Do you see him?

3 A. Yes.

4 Q. All right. At that point what are you  
5 thinking?

6 A. I don't remember what I was thinking.

7 Q. Now, it's obviously upsetting to you today.  
8 And as I mentioned at the beginning, I'm sorry I have to  
9 go through these questions, but you had gone there  
10 voluntarily, right?

11 A. That's correct.

12 Q. And you told him you were 18?

13 A. Yes.

14 Q. Why is it upsetting to you still?

15 MR. CRITTON: Form.

16 THE WITNESS: Because I now know what I was  
17 doing was wrong and I have so much regret for it.

18 BY MR. [REDACTED]:

19 Q. Do you think you didn't realize the full  
20 extent of what was going on at that time?

21 MR. CRITTON: Form.

22 BY MR. [REDACTED]:

23 Q. Let me ask it this way: Given your age of 16  
24 at the time and looking back on it now, do you think you  
25 fully realized what you were getting yourself into?

1 MR. CRITTON: Form.

2 THE WITNESS: I don't think I'll ever realize  
3 what I was getting myself into. I still don't know  
4 what I was thinking.

5 BY MR. [REDACTED]:

6 Q. Now that you're in your twenties, do you feel  
7 a little bit smarter about decisions you may make in  
8 your life?

9 A. Yes.

10 MR. CRITTON: Form.

11 BY MR. [REDACTED]:

12 Q. You think that comes with age?

13 MR. CRITTON: Form.

14 THE WITNESS: Yes.

15 BY MR. [REDACTED]:

16 Q. Okay. All right. After this all occurs, what  
17 happens next?

18 A. After the massage, I go downstairs. I get  
19 paid. We leave.

20 Q. Who pays you?

21 A. I can't remember.

22 Q. Do you remember if the money came from [REDACTED]  
23 [REDACTED] or Tony or whether it came from one of  
24 Mr. Epstein's people, like [REDACTED] or someone else?

25 A. Definitely not one of his people, but I

1 can't -- I can't be accurate. I don't know.

2 Q. Okay. You mentioned that the skirt came off.

3 Did you take it off or did he?

4 A. I did.

5 Q. Why?

6 A. I don't know.

7 Q. Did he ask you to?

8 A. I don't remember.

9 Q. Did your top come off at any point during  
10 this?

11 A. I don't remember.

12 Q. You said that he tried to touch you and you  
13 stopped him, correct?

14 A. Yes.

15 Q. Where did he try to touch you?

16 A. Below the belt.

17 Q. Did he try to touch you in the front or in the  
18 back?

19 A. In the front.

20 Q. At this point your skirt was off, correct?

21 A. Yes.

22 Q. Underwear was still on?

23 A. Yes.

24 Q. Regular type underwear? Thong type underwear?

25 A. Thong.

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 Q. All right. Does he finish before you get  
2 dressed or do you get dressed and then he finishes what  
3 he's doing?

4 A. I don't remember.

5 Q. At some point though you get dressed and go  
6 downstairs?

7 A. Yes.

8 Q. How do you know how to get downstairs? Does  
9 somebody meet you up outside the room and guide you down  
10 or you just know where to go?

11 A. I don't remember.

12 Q. Does he say anything to you after he finishes?

13 A. Yes.

14 Q. What?

15 A. He told me that if I can bring my friends,  
16 that for every girl that I bring to him he would pay me  
17 \$200.

18 Q. What do you think of that at that point?

19 A. At that point, I don't know.

20 Q. All right. When you go downstairs are [REDACTED]

21 [REDACTED] and Tony waiting for you?

22 A. Yes.

23 Q. Are they waiting in the kitchen?

24 A. Yes.

25 Q. Do you talk to them about what happened?

1 A. I don't remember.

2 Q. Do you all get in your pickup to leave at some  
3 point?

4 A. Yes.

5 Q. When you come downstairs and meet them in the  
6 kitchen, do you get the money and then immediately go or  
7 do you stick around at all?

8 A. We don't stick around. We go.

9 Q. How long does this entire encounter occur? In  
10 other words, we're talking about from the time when you  
11 pull up to the house to the time that you leave, is it  
12 approximately an hour? Two hours? Three hours?

13 A. Approximately an hour.

14 Q. When you all get in the truck to leave, at any  
15 point do you have a conversation with Tony and [REDACTED]  
16 [REDACTED] about what had just happened?

17 A. I don't remember.

18 Q. Were you in any state of shock at that point?

19 MR. CRITTON: Form.

20 THE WITNESS: I don't remember.

21 BY MR. [REDACTED]:

22 Q. This next question your attorney is going to  
23 object to, so I don't want you to say anything until she  
24 says objection or not.

25 Is this the first sexual experience that you

1 had ever had in your life?

2 MS. [REDACTED]: Predicate. Relevance. Privacy.

3 Do not answer that question.

4 BY MR. [REDACTED]:

5 Q. Same thing. Is this the first sexual  
6 experience you had in your life with a man that was not  
7 close to your age?

8 MS. [REDACTED]: Same objection.

9 Do not answer.

10 BY MR. [REDACTED]:

11 Q. When you got to the house and saw Mr. Epstein  
12 for the first time, could you give us an idea on how old  
13 he looked; in other words, what age you thought he was,  
14 approximately?

15 A. Late forties, early fifties.

16 Q. Okay. Clearly not your age?

17 A. Clearly.

18 MR. CRITTON: Form.

19 BY MR. [REDACTED]:

20 Q. Your age being 16?

21 A. Yes.

22 Q. All right. After that first time, you leave  
23 and get in the car with [REDACTED] and Tony, are you  
24 driving?

25 A. Yes.

1 Q. Do you drop them back off somewhere? Where do  
2 you go?

3 A. I don't remember.

4 Q. You got paid \$200?

5 A. Yes.

6 Q. Cash?

7 A. Yes.

8 Q. What do you do with it?

9 A. Shopping.

10 Q. Where did you go?

11 A. I don't remember.

12 Q. Do you remember what you went shopping for or  
13 what you did with it?

14 A. I don't. I can't recall.

15 Q. When you leave the house, do you all go  
16 somewhere in between taking [REDACTED] and Tony home;  
17 in other words, do you go to eat, do you go to a store,  
18 anything like that, that you can remember doing or do  
19 you just go and take them home?

20 A. I really can't recall.

21 Q. All right. Let's talk about now the -- the  
22 next time.

23 What's the next time that anything occurs  
24 where you are going to go to Mr. Epstein's house or you  
25 hear anything about Jeffrey?

1 A. Is when I brought a girl over.

2 Q. Okay. How did you know to do that? Was it  
3 the conversation you had in the room with him that first  
4 time?

5 A. [REDACTED] -- I had exchanged my number with [REDACTED].

6 Q. Okay.

7 A. And I don't know how we came into contact  
8 after that day, but the next time was with a woman, a  
9 girl.

10 Q. Okay. So at some point you gave your phone  
11 number to [REDACTED]?

12 A. Yes.

13 Q. Was it -- that before or after you had gone in  
14 the room for the massage with Jeffrey?

15 A. I don't remember.

16 Q. Was it before you left the house that day; in  
17 other words --

18 A. Yes.

19 Q. -- did you call her and give her the number or  
20 did you just give it to her in person when you were  
21 there?

22 A. Yes, I gave it to her in person.

23 Q. Okay. And did she call you about getting  
24 another girl for Jeffrey or did you call her that first  
25 time?

1 A. I don't remember.

2 Q. Who was the first girl that you brought over  
3 to Jeffrey's house?

4 A. I don't know.

5 Q. How many girls ultimately did you bring over  
6 to Jeffrey's house?

7 A. Maybe a dozen.

8 Q. Why?

9 A. I don't know. I don't know.

10 Q. For the money?

11 MR. CRITTON: Form.

12 THE WITNESS: I don't know.

13 BY MR. [REDACTED]:

14 Q. Looking back on it, bad decision?

15 MR. CRITTON: Form.

16 THE WITNESS: Yes.

17 BY MR. [REDACTED]:

18 Q. You regret doing it?

19 A. Yes.

20 MR. CRITTON: Form.

21 BY MR. [REDACTED]:

22 Q. Why?

23 A. It's consumed so much of my life.

24 Q. Thinking about the other girls for a moment,  
25 you think it was a bad decision bringing them over?

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 MR. CRITTON: Form.

2 THE WITNESS: Yes.

3 BY MR. [REDACTED]:

4 Q. Why?

5 A. I wouldn't be in this position if I didn't.

6 Q. Do you think it was harmful to them at all?

7 A. I don't know.

8 MR. CRITTON: Form.

9 BY MR. [REDACTED]:

10 Q. Did you think about them at any point?

11 A. No.

12 Q. How it may affect them or their lives?

13 A. Nope.

14 Q. How about today?

15 MR. CRITTON: Form.

16 THE WITNESS: Yes.

17 BY MR. [REDACTED]:

18 Q. What do you think?

19 MR. CRITTON: Form.

20 THE WITNESS: I don't know what to think.

21 BY MR. [REDACTED]:

22 Q. Do you think it may have negatively affected  
23 those girls that you brought over?

24 MR. CRITTON: Form.

25 THE WITNESS: I don't know.

1 BY MR. [REDACTED]:

2 Q. Obviously it's bothered you even today,  
3 correct?

4 A. Yes.

5 MR. CRITTON: Form.

6 BY MR. [REDACTED]:

7 Q. Think it was a bad decision for you?

8 MR. CRITTON: Form.

9 MS. [REDACTED]: Asked and answered as well,  
10 several times.

11 THE WITNESS: Yes.

12 BY MR. [REDACTED]:

13 Q. Equally was bad for them?

14 MR. CRITTON: Form.

15 THE WITNESS: I don't know.

16 BY MR. [REDACTED]:

17 Q. Okay. Do you remember the names of the  
18 approximately 12 girls that you brought over?

19 A. Yes.

20 Q. Let's go through them.

21 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED].

22 Another girl named [REDACTED]

23 Q. [REDACTED]?

24 A. Yeah. [REDACTED] I'm sorry. I'm having --

25 Q. It's okay.

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1                   Who else?

2                   A.    That's all I can remember right now.

3                   Q.    Okay.  How soon after that first time that you  
4                   went over did you bring the first girl over with you?

5                   A.    Days.

6                   Q.    How did you explain to that first girl what  
7                   she was going to be getting into or what she was going  
8                   to do?

9                   A.    Same way I was explained.

10                  Q.    Did you explain to that girl that she might  
11                  have to get undressed or did you leave that out?

12                  A.    No, I didn't say that.

13                  Q.    You left that part of it out?

14                  A.    Yes.

15                  Q.    Why?

16                  A.    I don't know.

17                  Q.    Think it would have been harder to convince a  
18                  girl to go over to the house if they knew they might  
19                  have to get naked?

20                  A.    I don't know.

21                  MR. CRITTON:  Form.

22                  BY MR. [REDACTED]:

23                  Q.    Would you have gone over that first time if [REDACTED]  
24                  told you that you might have to take your clothes off?

25                  MR. CRITTON:  Form.

1 THE WITNESS: I don't know.

2 BY MR. [REDACTED]:

3 Q. All right. But nonetheless you left that part  
4 out when you explained to the first girl about what was  
5 going to happen, correct?

6 A. Yes.

7 Q. And that first girl that you explained this  
8 thing to, did you tell her she was going to make money  
9 going over there for a massage?

10 A. Yes.

11 Q. Did you tell her that it was an older man that  
12 lived on the Island?

13 A. Yes.

14 Q. Did you tell her it was a rich billionaire  
15 that lived on the Island?

16 A. Yes.

17 Q. You don't remember that first girl's name or  
18 which one that was?

19 A. No, I do not.

20 Q. The girls that you brought over to Jeffrey's  
21 home, 12-some-odd girls, were all of them under the age  
22 of 18?

23 A. I'm sorry. Can you repeat that?

24 Q. Yeah. The 12-some-odd girls that you brought  
25 over to Jeffrey's house, were they all under the age of

1 18?

2 A. No.

3 Q. You brought an older girl over in her --

4 A. Yes.

5 Q. -- twenties, right?

6 A. Yes.

7 Q. What was her name?

8 A. [REDACTED].

9 Q. How did you know [REDACTED]?

10 A. Through her brother.

11 Q. And [REDACTED] was about -- what? -- 23? 24?

12 A. I believe 23.

13 Q. Okay. After you brought [REDACTED] over, what did  
14 Jeffrey say about her?

15 A. She was old.

16 Q. Did he tell you what he meant by that?

17 A. No.

18 Q. What did you take that to mean?

19 MR. CRITTON: Form.

20 THE WITNESS: That she was old.

21 BY MR. [REDACTED]:

22 Q. Did you get the impression that Jeffrey wanted  
23 girls that were about your age; in other words, around  
24 16 years old?

25 MR. CRITTON: Form.

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 THE WITNESS: I don't understand that  
2 question.

3 BY MR. [REDACTED]:

4 Q. Other than [REDACTED], had you brought any girls  
5 over that were in their twenties?

6 A. No.

7 Q. Was she the only girl that you can remember  
8 bringing over that was over the age of 18?

9 A. Yes.

10 Q. So all the other girls that you brought over  
11 were how old? I mean, what was the youngest? Was [REDACTED]  
12 the youngest?

13 A. [REDACTED] was the youngest.

14 Q. She was how old?

15 A. Fourteen.

16 Q. Fourteen the first time you brought her over,  
17 correct?

18 A. Yes.

19 Q. And you knew [REDACTED] through your cousin?

20 A. Yes.

21 Q. Okay. So you were bringing girls over from  
22 age 14 to age 17, right?

23 MR. CRITTON: Form.

24 THE WITNESS: Yes.

25 BY MR. [REDACTED]:

1 Q. Did you have an understanding that that's what  
2 Jeffrey liked, girls that were around that age, 14 to 17  
3 years old?

4 MR. CRITTON: Form.

5 THE WITNESS: I don't understand your  
6 question.

7 BY MR. [REDACTED]:

8 Q. Well, he told you that [REDACTED] was too old,  
9 right?

10 A. Yes.

11 Q. Why were you bringing girls, all of them  
12 except for [REDACTED], 14 to 17?

13 MS. [REDACTED]: Object, to the extent that  
14 you're asking her to speculate as to what  
15 Mr. Epstein was thinking and feeling.

16 MR. [REDACTED]: Don't want that.

17 BY MR. [REDACTED]:

18 Q. I want what you're thinking.

19 MS. [REDACTED]: If she has specific --

20 BY MR. [REDACTED]:

21 Q. I want what you were thinking.

22 Why did you only bring girls, except for  
23 [REDACTED], that were 14 to 17?

24 A. Because those are girls that I knew that I  
25 went to school with. It was easy access.

1 Q. Okay. Did Jeffrey tell you that he liked any  
2 of them that you brought over in particular?

3 A. Yes.

4 Q. Which one?

5 A. [REDACTED].

6 Q. Anyone else?

7 A. [REDACTED].

8 Q. Anyone else?

9 A. Not that I can remember.

10 Q. Did he tell you why he liked [REDACTED] and [REDACTED].  
11 the most?

12 A. No.

13 Q. Did he tell you what he did with [REDACTED]  
14 and [REDACTED]?

15 A. No.

16 Q. All right. We're going to change the tape, so  
17 we're going to take a five-minute break real quick.  
18 Okay?

19 VIDEOGRAPHER: Going off the video record.

20 This is the end of tape one. The time is  
21 12:35 p.m.

22 (Brief recess.)

23 VIDEOGRAPHER: We're back on the video record.

24 This is the beginning of tape two. The time is  
25 12:45 p.m.

1 BY MR. [REDACTED]:

2 Q. I want to go back, just a couple of things I  
3 wanted to cover about that first time before we move on.

4 At some point you spoke to police about  
5 Jeffrey Epstein, correct?

6 A. Yes.

7 Q. You gave, I believe, a couple of interviews  
8 actually to the police officers about what had happened?

9 A. A couple?

10 Q. Did you talk to them -- well, let me ask you.  
11 How many times did you talk to police in total, if you  
12 remember?

13 A. One time to the police.

14 Q. Did they call you on the phone and talk to you  
15 that time?

16 A. No.

17 Q. Did they talk to you in person?

18 A. Yes.

19 Q. Brought you down to the police department?

20 A. Yes.

21 Q. Was anyone with you when you went?

22 A. No.

23 Q. One police officer was there?

24 A. Two.

25 Q. Do you remember who they were?

1 A. No.

2 Q. Are you also aware that at some point you had  
3 phone calls with ■ that had been recorded?

4 A. At some point, yes.

5 Q. Somebody told you about those?

6 A. Yes.

7 Q. Who told you about those?

8 MS. ■: And, again, if you learned this  
9 through myself, ■ or any other attorney that's  
10 represented the same to you, do not disclose that.  
11 You are not --

12 MR. ■: Absolutely.

13 MS. ■: -- to discuss anything that  
14 you've learned through a conversation with one of  
15 your attorneys.

16 BY MR. ■:

17 Q. I'll clarify. Did you learn from a source  
18 other than your attorneys that you had had conversations  
19 with ■ over the phone that had been recorded?

20 A. No.

21 Q. During the conversations with the police, do  
22 you know if those were recorded?

23 A. Yes.

24 Q. Okay. Would you agree with me that your  
25 memory back then when the police first interviewed you

1 might have been a little bit fresher than it is today,  
2 some, we're talking three, four years later?

3 A. Yes.

4 Q. In looking through the police records, I just  
5 wanted to clarify a couple things. And if you remember  
6 them different, you tell me.

7 One of the things you mentioned to me was that  
8 during the incident he may have touched you in the front  
9 and you stopped him?

10 A. Yes.

11 Q. All right. In the police records, it mentions  
12 that Epstein grabbed your buttocks and you felt  
13 uncomfortable.

14 MR. CRITTON: I'm sorry.

15 BY MR. [REDACTED]:

16 Q. As you sit here today, do you recall whether  
17 he tried to touch you in the front or in the rear?

18 MS. [REDACTED]: I object to you using this  
19 record at all. I'm not sure if you're looking at a  
20 statement or if you're just looking at a probable  
21 cause affidavit and representing that a police  
22 officer said this or that.

23 If you have a particular statement that she's  
24 given, we'd like to see that and let her review it.  
25 Otherwise, this isn't proper impeachment.

1 BY MR. [REDACTED]:

2 Q. All I'm asking is, is, I just want to know if  
3 you remember specifically whether he tried to touch you  
4 in the front or it may have been in the back in the  
5 buttocks.

6 A. I know for a fact that he tried to touch me in  
7 the front. As far as the buttocks, it's possible. That  
8 was many years ago. I can't recall.

9 Q. Okay. One of the police officers said that  
10 you told him that Epstein expressed, the younger the  
11 better, when it came to girls being brought to the  
12 house.

13 MS. [REDACTED]: And, again, I'm going to object  
14 and ask you to clarify. Are you reading from a  
15 deposition? Have you learned specifically from a  
16 police officer himself? Do you have a statement  
17 that [REDACTED] has given that you're representing to  
18 her? Because right now you're just telling her  
19 what a police officer has said.

20 MR. [REDACTED]: Okay.

21 MS. [REDACTED]: And I think she's entitled to  
22 know what exactly you're trying to do, if this is  
23 impeachment. What are you asking her?

24 MR. CRITTON: Let me just note my objection,  
25 too. It's -- a police statement is not necessarily

1 accurate or inaccurate. But my objection is to  
2 form because I think it's inaccurate.

3 MR. [REDACTED]: Did you have a question at the  
4 end of your statement?

5 MR. [REDACTED]: I was waiting for all the  
6 objections because there wasn't one.

7 BY MR. [REDACTED]:

8 Q. All right. Let me ask the question now.

9 A. Okay.

10 Q. Do you recall Mr. Epstein, Jeffrey, ever  
11 saying to you with respect to girls being brought to the  
12 house, the younger the better?

13 MR. CRITTON: Form.

14 THE WITNESS: Yes.

15 BY MR. [REDACTED]:

16 Q. When did he say that?

17 A. I don't know. I can't recall.

18 Q. Was it after that first time?

19 A. I don't know.

20 Q. What did you take that to mean, the younger  
21 the better?

22 A. Not old.

23 Q. And old being obviously --

24 A. [REDACTED].

25 Q. Who was 23?

1 A. Yes.

2 Q. Okay. The first time you were there, you  
3 mentioned you got paid 200.

4 Do you know if [REDACTED] or Tony got paid?

5 A. Yes.

6 Q. How do you know that?

7 A. One of which had told me, [REDACTED] had told me. I  
8 don't know how much.

9 Q. But you know that [REDACTED] got paid for taking you  
10 there?

11 A. That's correct.

12 Q. Got you. Which would have been similar to the  
13 deal that he explained to you, if you bring someone,  
14 I'll give you 200 bucks?

15 A. Yes.

16 Q. Okay. The first girl you brought, you  
17 mentioned that you didn't tell her that she would have  
18 to get naked in any way.

19 Did you tell any of the subsequent girls that  
20 you brought that they might have to undress?

21 A. I don't remember.

22 Q. Okay. Very important, and I want to be  
23 specific about this. You said you brought about 12  
24 girls, approximately, to Jeffrey's home for these  
25 massages, all of which were under the age of 18 except

1 for [REDACTED].

2 As you sit here today, can you recall telling  
3 any of them that they would have to get naked at any  
4 point during the massage?

5 A. I really do not remember.

6 Q. Would you agree with me then at the very least  
7 that none of these girls that you brought would have  
8 known that they would have to get naked before they  
9 showed up at the house?

10 A. I don't understand your question.

11 Q. If you didn't tell them or you don't remember  
12 telling them that they would have to get naked at any  
13 point, would these girls have been able to hear it from  
14 anyone else, if you know?

15 A. I don't know.

16 MR. CRITTON: Form.

17 BY MR. [REDACTED]:

18 Q. Do you know if anyone else had approached any  
19 of the same girls that you brought to the home to  
20 discuss what was going to happen there?

21 A. I don't know.

22 Q. Was anyone with you, other than the girl that  
23 you would bring, on the times that you brought these  
24 girls to Epstein's home?

25 A. Yes.

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 Q. Who?

2 A. One occasion [REDACTED]

3 Q. What's her last name?

4 A. Coincidentally, [REDACTED].

5 [REDACTED]

6 [REDACTED]

7 Q. And who was [REDACTED]? Was she also a friend about  
8 your age?

9 A. She was a friend. I don't know her age.

10 Q. Was she in high school with you?

11 A. I don't know.

12 Q. How was it that she came to be with you on one  
13 occasion when you brought a girl?

14 A. We were friends. There's a lot of speculation  
15 about her age. She said she went to [REDACTED], but I  
16 don't -- never saw her. We were just friends. We met  
17 out and about.

18 Q. Okay. How did she end up with you that day  
19 though?

20 A. I called her to ask her if she wanted to tag  
21 along.

22 Q. And who were you bringing that particular day?

23 A. [REDACTED]

24 Q. So on that particular day, it was you, [REDACTED] and  
25 [REDACTED] that went?

1 A. Yes.

2 Q. And [REDACTED] was going to be the one giving the  
3 massage at that point?

4 A. That's correct.

5 Q. How many times did you go with [REDACTED]?

6 A. One time.

7 Q. Do you know whether she went other times  
8 without you?

9 A. I do not.

10 Q. You don't know for sure one way or the other?

11 A. I do not know for sure one way or the other.

12 Q. Other than that first time that you went, were  
13 there any other times that you actually gave Jeffrey a  
14 massage?

15 A. One time.

16 Q. How long after that first time was that?

17 A. I only gave one massage. I don't think I  
18 understand -- I don't think I understand your question.

19 Q. Okay. And I think you clarified it.

20 You mentioned that you went that first time  
21 and gave him a massage. Okay?

22 A. (Nods head.)

23 Q. Other than that one time, did you ever again  
24 give him a massage?

25 A. No.

1 Q. So all the other times that you went back to  
2 the home, you were just bringing other girls?

3 A. Yes.

4 Q. Got you. I had asked you whether the reason  
5 you were bringing these girls was the money. You  
6 remember that question?

7 A. Yes, I do.

8 Q. If not the maybe only reason you were doing  
9 it, would you agree with me that the money you were  
10 getting paid was at least one of the reasons why you  
11 were bringing girls there?

12 MR. CRITTON: Form.

13 THE WITNESS: Yes.

14 BY MR. [REDACTED]:

15 Q. Can you think of any other reason, other than  
16 the money, that you would have been bringing girls there  
17 to his house?

18 A. Being rebellious.

19 Q. Were you doing anything else in your life that  
20 was rebellious, other than this, at this point?

21 MS. [REDACTED]: Objection. And I'm going to  
22 instruct her not to answer that question, based on  
23 the same objections as earlier.

24 BY MR. [REDACTED]:

25 Q. Okay. When you went to Jeffrey's home, did

1           you ever meet up with the chef in the kitchen at any  
2           point?

3           A.    The chef was there.

4           Q.    Okay.  Maybe not every time or was it every  
5           time that the chef was there?

6           A.    Not every time.

7           Q.    Describe the chef for me.  Male or female?

8           A.    Male.

9           Q.    Race?  White?  Ethnic?  Anything?

10          A.    I can't remember.

11          Q.    Okay.  Approximate age?

12          A.    Can't remember.

13          Q.    Did you ever have any conversations with the  
14          chef?

15          A.    I can't remember.

16          Q.    Did you ever have any conversations with the  
17          house staff at all, either security or anyone in the  
18          house, other than [REDACTED]?

19          A.    No, not that I can remember at all.

20          Q.    All right.  While you don't remember the first  
21          girl that you brought, do you remember the next one  
22          after that?

23          A.    No.

24          Q.    Do you remember any of the order in which you  
25          brought these girls?

1 A. Yes.

2 Q. Tell me about that.

3 A. I only remember the last one being [REDACTED]

4 Q. That was the last one?

5 A. The last one.

6 Q. Why was she the last?

7 A. Because -- because I was 18. I had just  
8 turned 18. And I didn't even really want to bring her  
9 but she had kind of asked me to, so I did it.

10 And then after that, there were a lot of  
11 people warning me about her, that she was trying to set  
12 me up. So after that I stopped.

13 Q. Okay. But [REDACTED] was the last one you brought?

14 A. Yes.

15 Q. Did you stop bringing girls to the house  
16 because the police started the investigation right after  
17 the [REDACTED] incident?

18 A. No.

19 Q. Do you think that you would have stopped  
20 bringing girls to the house, had the police not started  
21 their investigation?

22 MR. CRITTON: Form. Speculation.

23 THE WITNESS: I don't know.

24 BY MR. [REDACTED]:

25 Q. After you brought [REDACTED], obviously there was a

1 big investigation that started, correct?

2 A. Yes.

3 Q. And you were caught up in that investigation?

4 A. Yes.

5 Q. Obviously, because you were called down to the  
6 police department to give an interview, right?

7 A. Yes.

8 Q. How long after you brought ■. did you first  
9 have a conversation with police?

10 A. Definitely months later.

11 Q. Okay.

12 A. That's all I know.

13 Q. Okay. Do you still talk to ■. at all?

14 A. No.

15 Q. Were you ever friendly with her?

16 A. Yes.

17 Q. How did that come about; in other words, how  
18 did you first become friends with ■.?

19 A. [REDACTED]

20 [REDACTED]

■ [REDACTED]

■ [REDACTED]

23 Q. Okay. How old were you when you met her, 17  
24 at that point? 18?

25 A. About 17, turning 18.

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**



1 Q. How old was [REDACTED] at the time?

2 A. I don't remember.

3 Q. Younger than you?

4 A. Yes.

5 Q. How is it that she learned about Jeffrey?

6 MR. CRITTON: Form.

7 BY MR. [REDACTED]:

8 Q. If you know.

9 A. I can't remember.

10 Q. Did you tell her?

11 A. Yes.

12 Q. Okay. Did she learn about Jeffrey for the  
13 first time, if you know, from you?

14 A. I don't know.

15 Q. Obviously you're aware that [REDACTED]. ultimately  
16 reported what had happened to the police?

17 A. Yes.

18 MR. CRITTON: Form to the last question.

19 BY MR. [REDACTED]:

20 Q. I'm assuming it made you a little upset.

21 Would you agree with that?

22 A. Yes.

23 Q. And do you sit here today thinking that if it  
24 had not been for [REDACTED]. maybe all this wouldn't have  
25 happened?

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 MR. CRITTON: Form.

2 THE WITNESS: I don't know.

3 BY MR. [REDACTED]:

4 Q. Do you blame her for all of this?

5 A. No.

6 Q. At all?

7 A. No.

8 (Brief interruption.)

9 BY MR. [REDACTED]:

10 Q. Are you upset with [REDACTED] for having started all  
11 this --

12 A. Not at all.

13 Q. -- even in the least bit?

14 A. No.

15 Q. No?

16 A. No.

17 Q. Are you upset with anyone that all this  
18 happened; in other words, this being the whole criminal  
19 investigation and all these lawsuits and anything like  
20 that, are you upset with anyone over all this?

21 MR. CRITTON: Form.

22 THE WITNESS: Yes.

23 BY MR. [REDACTED]:

24 Q. Who?

25 A. Myself.

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506

Electronically signed by Sandra Townsend (401-377-676-2895)  
Electronically signed by Sandra Townsend (401-377-676-2895)

1f88f113-5663-4dad-94e7-90ffb7174075

3501.182-102

Page 98 of 156

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

EFTA\_00094444

EFTA01248104

1 Q. Why?

2 A. Because I made a stupid decision.

3 Q. Do you think the stupid decision you made had  
4 at least partly to do with your age at the time?

5 MR. CRITTON: Form. Asked and answered about  
6 three times.

7 THE WITNESS: Yes.

8 BY MR. [REDACTED]:

9 Q. All right. That time that you took [REDACTED], you  
10 said that she talked to you or asked you about going?

11 A. Yes.

12 Q. All right. At that point in your life were  
13 you -- had you started your job at [REDACTED]?

14 A. Yes.

15 Q. When did you start that job?

16 A. I don't know. I cannot remember.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

22 Q. But you don't remember how old you were when  
23 you started that job?

24 A. I do not remember how old I was when I started  
25 [REDACTED].

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 Q. When you first went to Jeffrey's home for the  
2 first time, were you working at [REDACTED] then?

3 A. I don't remember.

4 Q. Did you work anywhere else before [REDACTED]  
5 [REDACTED]?

6 A. Before [REDACTED]?

7 Q. Yeah.

8 A. I don't remember.

9 Q. And [REDACTED] we're talking about is  
10 the one in [REDACTED]?

11 A. Yes.

12 Q. I think it's on [REDACTED]?

13 A. Yes.

14 Q. Got you. Okay.

15 Tell me about that first time you took [REDACTED]. How  
16 did that occur and what happened?

17 A. Me and [REDACTED] picked her up from her house. [REDACTED]  
18 [REDACTED]

19 Q. Okay.

20 A. We drove to Jeffrey's house. We had a  
21 discussion in the car about expectations.

22 Q. Tell me about that discussion.

23 A. I pretty much told her what was told to me, if  
24 he asks your age, lie, say that you're 18. Don't  
25 indicate that you're still in high school. The more you

1 do is the more you make.

2 Q. What did you mean by that?

3 A. The more you're willing to do is the more that  
4 he's going to pay you.

5 Q. I don't mean to play naive, but I need you to  
6 be specific, if you know. What did you mean by "the  
7 more you do?"

8 A. The more you do, the more you make, meaning,  
9 if you were obviously going to take off your skirt or  
10 your top and do it in a bra or if you were to do other  
11 things or allow him to do things to you, you were going  
12 to make more money.

13 Q. By "do things to you," you mean, sexually?

14 MR. CRITTON: Form.

15 THE WITNESS: Yes.

16 BY MR. [REDACTED]:

17 Q. Is what -- what did you mean by -- because he  
18 objected -- what did you mean by "do things to you?"

19 A. The massager.

20 Q. Okay. How did you first learn about the  
21 massager?

22 A. Well, I first saw it when I went over there  
23 the first time --

24 Q. Right.

25 A. -- in the bottom drawer. But through hearsay

1 I did hear a few of the girls mention the massager  
2 throughout me taking different girls.

3 Q. Okay. And what did you hear from the other  
4 girls about the massager?

5 A. That he would use it on them.

6 Q. Did you learn that the girls that allowed him  
7 to use the massager would make more money?

8 A. From what they said, yes.

9 Q. Were there any other things that he would do  
10 during these incidents that you heard about from the  
11 other girls, other than the massager?

12 A. That I heard about from the other girls?

13 Q. Yeah.

14 A. I heard from another girl, from [REDACTED]  
15 that he had slept with a girl named [REDACTED] and had  
16 made a thousand dollars.

17 Q. Okay. Was that girl someone you knew from  
18 high school as well?

19 A. Somebody that I knew on a first name basis in  
20 middle school [REDACTED].

21 Q. Was she about your age?

22 A. Yes.

23 Q. And you heard that from [REDACTED]?

24 A. Yes.

25 Q. Other than the massager and this girl that may

1 have slept with him that you heard about from [REDACTED]  
2 [REDACTED], were there any other acts that the girls told you  
3 about that would get them more money?

4 A. No.

5 Q. Did any of the girls tell you if he had sex  
6 with them they would get paid more?

7 MR. CRITTON: Form.

8 THE WITNESS: No.

9 BY MR. [REDACTED]:

10 Q. Did any of the girls say that if they got  
11 completely naked they would get more money?

12 A. No.

13 Q. I'm trying to find out, other than the  
14 massager then and that one time that you heard about a  
15 thousand bucks, what did you mean by if you do more, you  
16 get paid; in other words, where did you learn that?

17 A. I was told that.

18 Q. From who?

19 A. [REDACTED].

20 Q. Anyone else tell you that?

21 A. No.

22 Q. So [REDACTED] at some point told you, if you  
23 do more with Jeffrey, you'll get paid more?

24 A. That's correct.

25 Q. When did she tell you that? Was it before the

1 first time you went? After that first time you went?

2 A. I can't recall when.

3 Q. Did you ever discuss that with Jeffrey?

4 A. No.

5 Q. The times that you would bring the other  
6 girls, you would get paid money, correct?

7 A. Yes.

8 Q. Who would give you the money?

9 A. Jeffrey.

10 Q. Anyone else?

11 A. No.

12 Q. How would you get it from him? Would he come  
13 downstairs or would you go upstairs?

14 A. I don't remember.

15 Q. You mentioned that you brought 12-some-odd  
16 girls. Does that mean that you went there to the house  
17 those times with the girls when you brought them every  
18 time?

19 A. Yes.

20 Q. Did you go there more than just those 12  
21 times, plus the time that you went, so we got 13 now.

22 Did you go there more often?

23 A. I don't remember.

24 Q. Did you bring some girls more than once?

25 A. Yes.

1 Q. Which ones did you bring more often than not?

2 MR. CRITTON: Form.

3 THE WITNESS: I don't remember.

4 BY MR. [REDACTED]:

5 Q. Did you bring [REDACTED]. more than once?

6 A. No.

7 Q. What about [REDACTED]?

8 A. Yes.

9 Q. Do you remember how many times you brought  
10 her?

11 A. No.

12 Q. Did you bring any of the girls more than a  
13 couple times; in other words, did you bring some of them  
14 a lot, like, more than five?

15 A. No.

16 Q. Of any of the girls that you brought, after it  
17 was over and they came back downstairs, did any of them  
18 seem upset?

19 A. Yes.

20 Q. Which ones?

21 A. [REDACTED].

22 Q. Tell me about that.

23 A. Apparently her and Jeffrey got into an  
24 argument about money. She felt she should have earned  
25 more and he didn't feel the same way.

1 Q. Did you talk to [REDACTED] about what had occurred?

2 A. Briefly.

3 Q. Was this the time where Jeffrey accused her of  
4 looking at the clock?

5 MR. CRITTON: Form.

6 THE WITNESS: I don't know anything about  
7 that.

8 BY MR. [REDACTED]:

9 Q. What did she tell you?

10 A. [REDACTED] just came downstairs. She was very upset.  
11 As soon as we left, I had asked her why she was so  
12 upset.

13 And she was, like, you know, I should have  
14 gotten paid more. I took off my top. I thought I was  
15 going to get 300. I didn't get the amount I wanted.

16 And I just looked at her and I told her, don't  
17 argue money. Just let it go.

18 Q. Any of the other girls after this incident had  
19 occurred with them and they came back downstairs and met  
20 with you, did you notice that any of them were  
21 apparently upset or didn't seem to like the incident in  
22 any way?

23 A. No.

24 Q. You mentioned that Jeffrey paid you the \$200.  
25 Was that every time or did [REDACTED] give you the money some

1 of the time?

2 A. I don't remember.

3 Q. Was there -- when you were bringing girls, was  
4 there a routine; in other words, was there something  
5 that you knew you had to do every time you got there to  
6 the house for you?

7 A. No.

8 Q. Well, when you went the first time, [REDACTED]  
9 showed you how to set up the table?

10 A. Uh-huh.

11 Q. Showed you where the towels were? Yes?

12 A. Yes.

13 Q. Showed you where the massage oils were?

14 A. Yes.

15 Q. Did you have to do that for the other girls  
16 when you brought them, too?

17 A. Not all the time. It was either [REDACTED] or me,  
18 depending on if she was around.

19 Q. So if [REDACTED] wasn't around, you would have to  
20 do essentially what [REDACTED] did for you that first time?

21 A. [REDACTED] correct.

22 Q. And if [REDACTED] was around, you'd let her do  
23 that?

24 A. Yes.

25 Q. Do you know whether or not [REDACTED] ever gave

1 Jeff massages?

2 A. I don't know.

3 Q. Did you see any other girls at the house,  
4 other than the ones you may have brought and [REDACTED]?

5 A. Yes.

6 Q. Who?

7 A. I don't know their names. I did hear that  
8 they were models. They were tall, thin, attractive.  
9 They spoke a different language. Don't know their  
10 names.

11 Q. How many? Two?

12 A. I don't -- I don't remember.

13 Q. Do you ever recall meeting someone by the name  
14 of [REDACTED]? Does that name sound familiar to you?

15 A. Sounds familiar.

16 Q. Any other names that come to your head?

17 A. Not that I can remember, no.

18 Q. All right. Did you ever meet any older women  
19 that may have been at the house when you were there?

20 A. No.

21 Q. You say that with a smile. Did you ever see  
22 any women at his house that appeared to be over their  
23 twenties in any way to you?

24 A. A couple of the models looked older.

25 Q. Any others?

1 A. That I saw? No.

2 Q. Any girls that you ever saw at the house that  
3 looked his age?

4 A. No.

5 Q. For all the times that you brought these girls  
6 to the house, was it essentially the same routine, you  
7 would bring them, they would go upstairs, they would do  
8 whatever they were going to do for Jeffrey, they would  
9 then be done, you would get paid \$200 and you'd leave?

10 MR. CRITTON: Form.

11 THE WITNESS: Yes.

12 BY MR. [REDACTED]:

13 Q. I'm wondering whether any of those times that  
14 it was different than what I just generally described to  
15 you.

16 A. No.

17 Q. So regardless of who the girl was, the routine  
18 essentially was the same?

19 A. That's correct.

20 Q. Okay. Other than [REDACTED] telling you about the  
21 disagreement she had, did you have any discussions with  
22 any of the other girls about what occurred in the room  
23 during the massage?

24 A. Yes.

25 Q. Tell me about those.

1           A.    Sometimes when we would walk -- when I would  
2           walk to the car with the other girls to go home, I would  
3           try to start conversation, asking them what had took  
4           place.

5           Q.    Okay.

6           A.    A lot of them would just look at me and say,  
7           nothing.  Some would describe the same situation that I  
8           went through the first time I gave a massage.

9           Q.    Okay.

10          A.    That's it.

11          Q.    All right.  Did any of the other girls tell  
12          you that they told Jeffrey to stop at any point?

13          A.    No.

14          Q.    You told him to stop, correct?

15          A.    Yes.

16          Q.    As you sit here today though, you don't know  
17          what went on in the room with those other girls, do you?

18          A.    I do not know what happened.

19          Q.    Okay.  The staircase leading up to the  
20          upstairs, do you recall seeing any pictures on the walls  
21          as you went up?

22          A.    I did see a couple pictures on the walls.  It  
23          looked like artwork.

24          Q.    Did you see any pictures of young girls, that  
25          you can recall?

1 A. Young girls? I don't remember that.

2 Q. Girls?

3 A. I don't remember what sex.

4 Q. Do you recall seeing any photographs of naked  
5 women in the house?

6 A. Yes.

7 Q. Where?

8 A. Throughout the house. I can't be sure where.  
9 There was a photograph, black and white of a woman's  
10 torso, no arms, and her breasts.

11 Q. You don't remember where that was?

12 A. I don't remember what wall that was on or what  
13 room.

14 Q. Upstairs or downstairs?

15 A. I don't remember.

16 Q. Do you recall seeing any paintings of naked  
17 women in the house?

18 A. Paintings?

19 Q. Paintings.

20 A. I don't remember.

21 Q. When you gave Epstein a massage, did you have  
22 to at any point get onto the table with him?

23 A. No.

24 [REDACTED]

[REDACTED]

█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]

10 Q. Okay. When you went to the police station for  
11 the first time when they came to your house, were your  
12 parents home when the cops first came?

13 A. No. My mom had just left.

14 Q. After the massage you gave to Mr. Epstein, did  
15 he ever express to you that he understood you weren't  
16 comfortable with what had happened?

17 MR. CRITTON: Form.

18 THE WITNESS: We didn't talk about it.

19 BY MR. █:

20 Q. At some point did you change your cell number?

21 A. At some point, yes.

22 Q. Why?

23 A. Many reasons.

24 Q. Was one of the reasons so that █ would  
25 stop calling you?

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 MR. CRITTON: Form.

2 BY MR. [REDACTED]:

3 Q. [REDACTED] [REDACTED]?

4 A. One of the reasons was because I was moving on  
5 with my life and I had left a lot of that in my past. I  
6 was getting prank calls and I was moving.

7 Q. All right. The police came to your house in  
8 approximately October of 2005; is that about right?

9 A. Don't remember.

10 Q. You were about 17 when they first came to the  
11 house or had you turned 18 yet?

12 A. I don't remember. Wait. What was the date on  
13 that?

14 Q. October of 2005.

15 A. October 2005?

16 [REDACTED]

17 A. I was 18 then.

18 Q. You were 18 at that point?

19 A. Yes.

20 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1

2

3

Q. All right. Do you remember when you changed your cell number, was it before or after the police came to talk to you?

6

A. I believe before. I don't know.

7

8

Q. Before the police came to talk to you, had [REDACTED] called you and talked to you and said anything about police?

10

A. No.

11

12

Q. After they came to talk to you, she called you and told you about the police, didn't she?

13

MR. CRITTON: Form.

14

15

THE WITNESS: No. Somebody had called my house from that number.

16

BY MR. [REDACTED]:

17

Q. Right.

18

19

A. I did not answer it. It was not spoken about. I did not talk to her or Epstein about any police.

20

21

22

23

Q. Okay. At any time do you recall telling the police that someone, likely it was [REDACTED], called you and said the police are conducting an investigation, don't talk to them?

24

MR. CRITTON: Form.

25

THE WITNESS: No.

1 MR. [REDACTED]: Just answer his questions.

2 THE WITNESS: No.

3 MR. [REDACTED]: Then he'll ask you another  
4 question.

5 BY MR. [REDACTED]:

6 Q. Go ahead. Did someone call you?

7 MS. [REDACTED]: She said, no.

8 BY MR. [REDACTED]:

9 Q. Did someone call you?

10 A. Someone called me. I did not speak to them.

11 Q. Okay. Would [REDACTED] call you on your cell phone  
12 to tell you when Mr. Epstein was in town?

13 A. Yes.

14 Q. Is that how you know or knew when to bring  
15 girls to the house?

16 MR. CRITTON: Form.

17 THE WITNESS: Yes.

18 BY MR. [REDACTED]:

19 Q. Was there anyone else that would call you and  
20 tell you that he was going to be in town, other than

21 [REDACTED]?

22 A. No.

23 Q. Was your only contact point [REDACTED] and  
24 Mr. Epstein?

25 A. Yes.

1 MR. CRITTON: Form.

2 BY MR. [REDACTED]:

3 Q. Would Jeffrey ever call you?

4 A. No.

5 Q. He never called you himself?

6 A. No.

7 Q. So it was all through [REDACTED]?

8 A. Yes.

9 Q. Did you ever tell police that [REDACTED] still,  
10 even in October of 2005, was trying to call your house  
11 and leaving messages for you?

12 MR. CRITTON: Form.

13 THE WITNESS: Don't remember.

14 BY MR. [REDACTED]:

15 Q. Do you recall [REDACTED] calling your house and  
16 leaving messages for you after the police started their  
17 investigation?

18 A. I don't remember.

19 Q. Did you save any phone conversations or  
20 messages that [REDACTED] had left at your home?

21 A. I don't remember.

22 Q. Do you remember giving police a tape from the  
23 phone message machine where [REDACTED] had called your house?

24 A. I don't remember.

25 Q. After speaking to the police that first

1 time -- well, let me ask you about that, first of all.

2 When the police talked to you that first  
3 occasion, did they read you your Miranda Rights?

4 A. I don't remember.

5 Q. Do you recall if they ever told you, you had  
6 the right to remain silent?

7 A. No, they never said that.

8 Q. Did you ever sign a document with them; in  
9 other words, sign any paper?

10 A. I don't remember.

11 Q. Were your parents with you at that point?

12 A. No.

13 Q. Do you recall the police telling you that you  
14 could be criminally prosecuted when they were talking to  
15 you?

16 A. Yes.

17 Q. And at what point in the conversation did that  
18 occur? Was it at the beginning? The middle? The end?

19 A. I don't remember.

20 Q. What did they say?

21 A. It was at the station. And they had said that  
22 I had admitted to some sort of felony and that I can be  
23 arrested for it.

24 Q. Okay. The police drove you back to your  
25 house?

1 A. Yes.

2 Q. Did you know they had a recording device in  
3 their car at the time?

4 A. At that time? No.

5 Q. Did you learn later?

6 A. Yes.

7 Q. Did you say something in the car when you were  
8 on your way home?

9 A. Yes.

10 Q. Why don't you tell us what you said.

11 MR. [REDACTED]: Hang on. I want to have a  
12 conference with my client before she answers that  
13 question.

14 MR. [REDACTED]: On what basis?

15 MR. [REDACTED]: Potential privilege.

16 MR. [REDACTED]: Which privilege?

17 MR. [REDACTED]: Fifth Amendment.

18 MR. [REDACTED]: Okay.

19 VIDEOGRAPHER: Going off the record. The time  
20 is 1:22 p.m.

21 (Brief recess.)

22 VIDEOGRAPHER: We're back on the video record.  
23 The time is 1:30 p.m.

24 MR. [REDACTED]: After your break, Madame Court  
25 Reporter, if you could go back and just read my

1 last question before we broke.

2 (Pending question was read.)

3 MS. [REDACTED]: I am going to instruct [REDACTED] to  
4 assert her Fifth Amendment Right in order to  
5 protect her Fifth, Sixth and 14th, and specifically  
6 with regard to any further conversation or  
7 statement she had or made to police officers.  
8 We've allowed you free reign with regard to her  
9 interactions and involvement and dealings with  
10 Jeffrey Epstein. But at this point I'm going to  
11 instruct her to assert her Fifth Amendment Rights.  
12 And I'll repeat it with each question, if you want,  
13 or I'll let you ask her and she can assert it  
14 herself.

15 MR. [REDACTED]: Yeah, I think that procedurally  
16 the way we've been handling it in this case so far  
17 is that the witness' -- it's the witness'  
18 privilege, so the witness has to actually assert  
19 that privilege.

20 MS. [REDACTED]: Okay. So you need to ask it  
21 again.

22 MR. [REDACTED]: Right. So I'm going to go through  
23 each question that I may ask in sequence really  
24 quickly on this topic and then if she's going to  
25 assert her Fifth, then I would ask that she do that

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 individually. Okay? All right.

2 BY MR. [REDACTED]:

3 Q. The last question I asked is: What did you  
4 say in the car after the police interviewed you?

5 A. I'm going to assert my Fifth.

6 Q. Did you tell police, quote, I'm like a Heidi  
7 Fleiss?

8 MR. [REDACTED]: Stop. You instruct. Get the  
9 procedure down.

10 THE WITNESS: I'm going to assert my Fifth  
11 Amendment.

12 BY MR. [REDACTED]:

13 Q. Do you know who Heidi Fleiss is?

14 A. I'm going assert my Fifth Amendment Right.

15 Q. Are you aware that Heidi Fleiss is a  
16 relatively famous madame who brought girls or arranged  
17 for girls with respect to prostitution in California?

18 A. I'm going to assert my Fifth Amendment Right.

19 Q. At some point after the interview with police,  
20 did you learn that they had recorded that conversation?

21 Let me put it this way: Did you learn that  
22 they had recorded a conversation that you had in the  
23 police car?

24 MS. [REDACTED]: That's fine. You can answer.

25 THE WITNESS: Yes.

1 BY MR. [REDACTED]:

2 Q. Did you ever see a transcript of that  
3 conversation?

4 A. No.

5 Q. Did you ever see a probable cause affidavit  
6 that had been drafted with respect to you?

7 A. No.

8 Q. Never read it?

9 A. Never read it. I don't even know what you're  
10 talking about.

11 Q. Okay. One last thing before we break for  
12 lunch.

13 A. Uh-huh.

14 Q. We were talking before about phone calls that  
15 had been made to you after police started their  
16 investigation. Do you recall those questions generally?

17 A. Yes.

18 Q. I want to ask it this way: After the  
19 investigation began, other than the one call that you  
20 discussed with us where someone called your house  
21 wanting to talk to you, --

22 A. Uh-huh.

23 Q. -- did anyone else ever call your home to  
24 discuss with you the investigation, other than your  
25 lawyers?

1 A. No, not that I can remember, no.

2 Q. Were there any other phone calls that were  
3 made to your house after the investigation began about  
4 Jeffrey?

5 A. No, not that I can remember.

6 Q. And as you sit here today, your testimony is,  
7 you never talked to someone that said they worked for  
8 Jeffrey that told you not to talk about the incident; is  
9 that your testimony?

10 A. I don't remember ever having a conversation  
11 like that.

12 MR. [REDACTED]: Okay. All right. Let's take a  
13 break for lunch and we'll come back -- and do you  
14 need 45 or an hour?

15 VIDEOGRAPHER: Off the record.

16 (Lunch recess.)

17 VIDEOGRAPHER: We're back on the video record.

18 The time is 2:20 p.m.

19 BY MR. [REDACTED]:

20 Q. Okay. When we left off we were talking about  
21 after the police got done with their interview of you  
22 and you were going home.

23 I want to go back for just one second. I did  
24 forget to ask you something.

25 The questions I was asking you about whether

1 or not someone who worked for Jeffrey or represented  
2 him, that they were from Jeffrey, whether they called  
3 you after the police had first contacted you.

4 I want to go to before the police got to your  
5 house and came and talked to you.

6 A. Okay.

7 Q. Before that point when the police came, did  
8 anyone talk to you and say anything about the police  
9 investigating, what you should say, anything like that?

10 A. I do not ever remember getting a call at all.

11 Q. How about in-person conversations?

12 A. No.

13 Q. Okay. Just so we're clear, no conversations  
14 that you can recall, as you sit here today, either  
15 before or after the police investigation started, from  
16 either Jeffrey, [REDACTED] or anyone that represented that  
17 they were calling on behalf of Jeffrey or talking to you  
18 in person on behalf of Jeffrey, talked to you about what  
19 to say or what not to say during the investigation?

20 A. That's correct. That conversation in person,  
21 over the phone never happened or on behalf of Jeffrey  
22 Epstein.

23 Q. No e-mails?

24 A. No e-mails.

25 Q. No texting?

1 A. No texting.

2 Q. Did you ever text anything with [REDACTED]?

3 A. I don't believe I ever did, no.

4 Q. Did you ever e-mail with [REDACTED]?

5 A. Never e-mail.

6 Q. Were there any other communications that you  
7 ever had with [REDACTED], other than phone conversations, in  
8 any other format, electronic or otherwise?

9 A. No.

10 Q. Okay. After the police dropped you off after  
11 that initial interview, what did you do?

12 A. Well, I had explained to my parents what had  
13 just happened and just taken place.

14 My -- I don't recall if my dad was there. My  
15 mom was.

16 I sat her down and I discussed what was going  
17 on and what had happened.

18 My dad was immediately contacted. [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

█ [REDACTED]

█ [REDACTED]

3 Q. Oh, okay. So at that point a criminal  
4 attorney was hired by your parents?

5 A. That's correct.

6 Q. Are you still represented by that criminal  
7 attorney to this day?

8 A. 'Til this day?

9 MS. [REDACTED]: I don't really know that that's  
10 an appropriate question. I'm going to instruct her  
11 not to answer it if the only way she knows the  
12 answer to that is through talking with her criminal  
13 attorney or with a civil attorney.

14 BY MR. [REDACTED]:

15 Q. All right. Well then, I guess, let me ask it  
16 this way: The attorneys that are here representing you  
17 here today are your civil attorneys.

18 A. Yes.

19 Q. Do you understand that?

20 A. Uh-huh.

21 Q. Yes?

22 A. Yes, I do understand that.

23 Q. Who's paying their bill?

24 MS. [REDACTED]: I'm going to ask her not to  
25 answer that if the only way she knows that

1 information is through her attorneys.

2 BY MR. [REDACTED]:

3 Q. Okay. Do you know who is paying their bill,  
4 other than what the attorneys may have said to you?

5 A. No. I know who's paying my bill from what my  
6 attorneys have told me.

7 Q. And that's the only way you know it?

8 A. And that's the only way I know it.

9 Q. Let me ask it this way: Are you paying for  
10 the civil attorneys?

11 A. No.

12 Q. Are your parents paying for the civil  
13 attorneys?

14 A. No.

15 Q. Are any of your relatives paying for the civil  
16 attorneys?

17 A. No.

18 Q. Did you find the civil attorneys?

19 A. Did I find the civil attorneys?

20 Q. Yes. It's a very good law firm that's  
21 representing you here today in this civil litigation  
22 context.

23 A. No, I did not find my attorneys. My criminal  
24 lawyer did.

25 Q. Okay. You got paid \$200 every time that you

1           took a girl to Jeffrey's house. But do you know, as you  
2           sit here today, the total amount of money that you made  
3           taking girls there?

4           A.    I do not know.

5           Q.    Would you agree with me that it had to be in  
6           the thousands?

7           A.    Yes, I can say that.

8           Q.    Had to be in the multiples of thousands?

9           A.    I wouldn't say, multiples of thousands.

10          Q.    Well, if we're talking --

11          A.    Wait. What do you mean, "multiples?" Two  
12          thousand? Three thousand?

13          Q.    Yes.

14          A.    Yes. I'm sorry. I thought you were talking  
15          about double digits.

16          Q.    No. Let me be more specific.

17                    If we look at just the 12, the dozen at 200  
18          each time, that's about \$2,400.

19          A.    Plus the time that I massaged, which would  
20          bring it up to 2600.

21          Q.    And then you brought some girls more than  
22          once?

23          A.    Okay.

24          Q.    Right?

25          A.    Yes.

1 Q. So would you agree with me that the number  
2 that you made just bringing girls would have to be in  
3 excess of 3,000?

4 A. I don't know.

5 Q. Did you deposit any of the money that you made  
6 into a bank account?

7 A. No.

8 Q. You just kept the cash and then spent it?

9 A. Yes.

10 Q. Did Mr. Epstein give you -- let me ask it this  
11 way: Did Mr. Epstein or someone on his behalf give you  
12 any money, other than when you brought girls?

13 A. No.

14 Q. Did you get a Christmas bonus?

15 A. No.

16 Q. Did you get a Western Union telegram of money  
17 at any point?

18 A. No.

19 Q. Are you aware that other girls did?

20 MR. CRITTON: Form.

21 THE WITNESS: I guess I am now.

22 BY MR. [REDACTED]:

23 Q. Are you learning that through me or did you  
24 learn that --

25 A. I learned through bonuses.

1 Q. That's what I'm looking for. Did you get  
2 bonuses?

3 A. I did not personally, no.

4 Q. Did Mr. Epstein give you any gifts?

5 A. No.

6 Q. Have you heard that he paid for certain baby  
7 showers of some girls?

8 A. A baby shower? No.

9 MR. CRITTON: Form.

10 BY MR. [REDACTED]:

11 Q. Never heard about that?

12 A. No.

13 Q. Did he ever rent you a car?

14 A. No.

15 Q. Did you ever ask him to rent you a car and he  
16 said no?

17 A. No.

18 Q. Did he ever pay for anything, that you can  
19 think of as you sit here today?

20 A. He never paid for anything.

21 Q. So the only thing he gave you was the \$200  
22 cash every time you brought a girl and the time that you  
23 did the massage yourself?

24 A. Can I have a minute?

25 Q. Sure.

1 MR. CRITTON: What was the question? Would  
2 you read it back, please?

3 MR. [REDACTED]: Yeah.

4 MS. [REDACTED]: Go ahead.

5 MR. [REDACTED]: Yeah. While you figure it out,  
6 let her read it back.

7 (Pending question was read.)

8 MS. [REDACTED]: I think we've answered that.

9 MR. [REDACTED]: Okay.

10 THE WITNESS: That was the only time he paid.  
11 That's the only time I received money from him.

12 BY MR. [REDACTED]:

13 Q. Did you receive anything else from him, other  
14 than money?

15 A. No.

16 Q. Did you get anything from [REDACTED] [REDACTED], other  
17 than money?

18 A. No.

19 Q. Did you get money from [REDACTED] [REDACTED]?

20 A. No.

21 Q. Did you get money from anyone other than  
22 Jeffrey or [REDACTED] that said that they were working on  
23 behalf of Jeffrey or that you knew was working on behalf  
24 of Jeffrey?

25 A. The only person that ever gave me money was

1 Epstein. And I have not received anything else.

2 Q. No one on his behalf?

3 A. No one on his behalf.

4 Q. Gave you anything?

5 A. Gave me anything.

6 Q. Okay. All right. After the investigation  
7 began and you talked to police, did you ever have any  
8 further conversations with Mr. Epstein after that date?

9 A. No.

10 Q. Did you ever have any further conversations  
11 with [REDACTED] [REDACTED] after that date?

12 A. No.

13 Q. Do you remember before the police came to your  
14 house, [REDACTED]. calling you at [REDACTED] [REDACTED]?

15 A. Yes, I do recall that.

16 Q. What did she say to you during that  
17 conversation, as best you can recall?

18 A. As best as I can recall, she called once.  
19 They told her I was busy, to call back later.

20 She called back a second time, asked to speak  
21 with me.

22 I then picked up the line.

23 She had asked me if she can work for Jeffrey  
24 again.

25 I told her no. I told her that she was

1 basically full of herself and that I heard she was  
2 trying to set me up and trying to -- to rat me out, is  
3 basically what I had said to her.

4 Q. Have you seen the transcript of that phone  
5 conversation that you had with her?

6 A. I have not seen the transcript, no.

7 Q. Okay. There were two phone calls that you can  
8 recall, one where you weren't available and the second  
9 one where you actually talked to her?

10 A. That's correct.

11 Q. Because your attorney asked before to see, let  
12 me just show this to your attorney really quickly.

13 MR. CRITTON: You going to mark it as an  
14 Exhibit?

15 MR. [REDACTED]: No.

16 MS. [REDACTED]: What are you showing me?

17 MR. [REDACTED]: The phone call.

18 MS. [REDACTED]: Can you clarify, like, how this  
19 was transcribed? Is this something your office  
20 did?

21 MR. [REDACTED]: From the police. No, it was given  
22 to me from the State Attorney and the police  
23 department.

24 THE WITNESS: And it was recorded.

25 MS. [REDACTED]: And is this a document you're

1 going to ask [REDACTED] some questions about now?

2 MR. [REDACTED]: Yes.

3 MS. [REDACTED]: Then I'm going to have her read  
4 it as well.

5 MR. [REDACTED]: Okay. That's fine. I didn't know  
6 if you wanted to read it first.

7 MR. CRITTON: Before you start, let me read  
8 it, too.

9 MS. [REDACTED]: Do you want to get a couple  
10 copies?

11 MR. [REDACTED]: Do you want to take a second so we  
12 can all read this?

13 THE WITNESS: What is this? Is U-N-K unknown  
14 caller? Is that me?

15 MR. [REDACTED]: It's one of the things I was going  
16 to ask you.

17 MS. [REDACTED]: Let's get copies of all this for  
18 everybody, since no one seems to have it.

19 MR. CRITTON: Why don't you mark it as an  
20 Exhibit, too. Why don't we call it Exhibit 2 and  
21 have it copied, put a sticker on it, please.

22 MR. [REDACTED]: They got to stop talking for you  
23 to copy it. I know.

24 VIDEOGRAPHER: You want to go off the record?

25 MR. [REDACTED]: Yeah.

1 VIDEOPHOTOGRAPHER: Going off the video record.

2 The time is 2:35 p.m.

3 (Brief recess.)

4 VIDEOPHOTOGRAPHER: We're back on the video record.

5 The time is 2:35 p.m.

6 BY MR. [REDACTED]:

7 Q. While they're making copies of the other  
8 document I was going to ask you about, I want to go  
9 through some of these photographs, if I could, for a  
10 minute.

11 I'm going to mark this one as Exhibit 2 to  
12 your deposition. Let me just hold it up for the camera  
13 first.

14 MR. CRITTON: I think we marked the statement  
15 number 2.

16 MR. [REDACTED]: No. You wanted to mark the  
17 statement number 2, but I never agreed to that. So  
18 this is number 2.

19 VIDEOPHOTOGRAPHER: That's fine.

20 (Exhibit number 2 was marked for  
21 identification purposes.)

22 BY MR. [REDACTED]:

23 Q. All right. I'm going to show you what is  
24 Exhibit 2. And let me just ask you, first, do you  
25 recognize the photograph?

1 A. Yes.

2 Q. Who took it?

3 A. [REDACTED].

4 Q. What was it for?

5 A. [REDACTED].

6 Q. And how old were you in this photo?

7 A. Eighteen, 19 maybe.

8 Q. And this is you?

9 A. This is me.

10 Q. Where was this posted on the Internet?

11 A. This was posted on my --

12 Q. Initially?

13 A. Initially on My Space page.

14 Q. Subsequently it was posted a lot of different

15 places on the Internet. You're aware of that, correct?

16 A. No. What are you talking about?

17 Q. In news stories regarding Mr. Epstein, have

18 you seen this posted in other places?

19 A. Yes.

20 Q. They've used this photograph when talking

21 about --

22 A. Wait. I'm confused.

23 Q. Let me back up.

24 This is a photo that you put on the Internet

25 yourself?

1 A. Yes.

2 Q. On your My Space page?

3 A. Yes.

4 Q. And it shows you at around 18 years old?

5 A. Yes.

6 Q. Have you seen it --

7 MR. CRITTON: Form of the last question. You  
8 said 18 or 19.

9 MR. [REDACTED]: Eighteen or 19.

10 BY MR. [REDACTED]:

11 Q. Have you seen this posted any other place,  
12 other than your My Space page, on the Internet?

13 A. That, and a lot of the blogs about Epstein and  
14 the whole situation in Google. Other than that, no.

15 Q. This particular photo of you, have you had any  
16 physical changes to your body subsequent to this  
17 photograph being taken?

18 MS. [REDACTED]: Objection. I'm not sure where  
19 or why you're going with this. I don't think it's  
20 relevant. You haven't laid any type of predicate.  
21 And this is a private matter for [REDACTED], who is not  
22 a Plaintiff or a Defendant in this case.

23 I'm going to instruct her not to answer that  
24 question.

25 BY MR. [REDACTED]:

1 Q. Okay. Did you post any photos of yourself on  
2 the Internet younger than the age of 18; in other words,  
3 on your My Space page, were there any photos of you  
4 younger than 18?

5 A. I don't remember.

6 Q. You have photos of you at the time when you  
7 were 16, 15, 17 years old?

8 A. Possibly.

9 Q. At home?

10 A. Yeah.

11 Q. Okay. Let me show you what we'll mark as  
12 Exhibit 3. Ask you if you recognize anyone in this  
13 particular photograph.

14 (Exhibit number 3 was marked for  
15 identification purposes.)

16 MR. [REDACTED]: And hold this up for the camera  
17 first.

18 VIDEOGRAPHER: Okay.

19 MR. CRITTON: Let me see it again, please.

20 MR. [REDACTED]: Got your own.

21 BY MR. [REDACTED]:

22 Q. Take a look at that photo.

23 Do you recognize anyone in the photograph  
24 we've marked as Exhibit 3?

25 A. The middle girl looks like [REDACTED].

1 Q. Recognize any of the men in that photograph?

2 A. No, I don't.

3 Q. All right. When you say, "██████," you mean,  
4 ██████ ██████?

5 A. Yeah.

6 Q. And ██████ ██████ is the girl that you met at  
7 Jeffrey Epstein's house?

8 A. Yes.

9 Q. Let me show you what we'll mark as Exhibit --  
10 MR. CRITTON: Did you have any extra copies of  
11 Exhibit 2 for us all?

12 MR. ██████: I do.

13 MR. CRITTON: Thank you.

14 MR. ██████: Mark the photograph as Exhibit 4.  
15 (Exhibit number 4 was marked for  
16 identification purposes.)

17 BY MR. ██████:

18 Q. Show this one to you. Camera first.  
19 Okay? Let me show you what we marked as  
20 Exhibit 4.

21 First of all, do you recognize the gentleman  
22 in that photograph?

23 A. Mr. Jeffrey Epstein.

24 Q. Do you recognize the girl in that photo?

25 A. No. I don't remember her.

1 Q. Does not look familiar to you?

2 A. I don't remember her.

3 Q. Let's go now.

4 MR. [REDACTED]: We've got the copies of the  
5 statement brought back?

6 MS. [REDACTED]: Yes. You need a copy?

7 MR. [REDACTED]: You got my original?

8 MS. [REDACTED]: Take your time and read the  
9 whole thing.

10 MR. [REDACTED]: Somebody's got one that's  
11 highlighted. Who's got it?

12 THE WITNESS: I think I have it.

13 MR. CRITTON: I think I do.

14 THE WITNESS: Nevermind.

15 BY MR. [REDACTED]:

16 Q. Go ahead. I want you to read it. It's only  
17 four pages.

18 MR. CRITTON: Can we mark it as Exhibit 5? Do  
19 you have any objection to doing that? If not, I'll  
20 just mark it as a Defense Exhibit. It's an Exhibit  
21 you're showing to her.

22 MR. [REDACTED]: I just don't know. Let me ask  
23 some questions and I'll figure it out.

24 MR. CRITTON: Well, I'm going to direct it be  
25 marked by the reporter. It's a statement that's

1 being shown to her.

2 Mark it as Defense Exhibit 1, please.

3 MR. [REDACTED]: I think you can only do that  
4 during your examination, but...

5 MR. [REDACTED]: I think so, too, but...

6 MR. CRITTON: I'm doing it now. Call me in  
7 front of the Judge on it.

8 MR. [REDACTED]: Bob Critton rules of taking  
9 deposition. It's a different rule book.

10 Get up in years, you're allowed to do that.

11 (Defendant's Exhibit number 1 was marked for  
12 identification purposes.)

13 BY MR. [REDACTED]:

14 Q. Okay. Does that help refresh your  
15 recollection about the phone call that [REDACTED] placed to you  
16 that was being recorded?

17 A. I don't really remember it like this, but,  
18 then again, it was years ago. I do remember her calling  
19 twice though.

20 Q. And you noticed in this, what's now, I guess,  
21 been marked as Defendant's Exhibit 1, you remember or  
22 you've seen that there's two phone calls noted here in  
23 this Exhibit?

24 A. Well, I was kind of confused because it looked  
25 like she called my house.

1 Q. Right.

2 A. And then it looks like she called my house  
3 again.

4 And then it looked like maybe she called [REDACTED]  
5 [REDACTED].

6 Q. Okay. In looking at the conversation  
7 beginning on page 3, do you see that?

8 A. Yes.

9 Q. All right. Let's start from the top.  
10 Do you know whether there was a [REDACTED] working at  
11 [REDACTED] --

12 A. Yes.

13 Q. -- when you worked there?

14 Who? [REDACTED] who?

15 A. [REDACTED]

16 Q. Okay. Friendly with her? Just a working  
17 friend?

18 A. Employee.

19 Q. Do you recall [REDACTED] being the one that took the  
20 call and got you to get you on the phone?

21 A. I don't remember.

22 Q. Do you recall [REDACTED] calling you and saying, I  
23 need some money, I was wondering if you could take me to  
24 Jeff's house?

25 A. I remember I was having a conversation about

1 me taking her back to Jeff's house.

2 Q. And it says here on line 11: "I was wondering  
3 if you could take me back to Jeff's house."

4 Do you recall her saying that?

5 A. No. But like I said, this was a couple years  
6 ago.

7 Q. It notes here, the next line on page -- on  
8 line 12 and 13: "I don't know. The last time I did  
9 that, um, I heard that your dad wanted to press charges  
10 and stuff."

11 What were you referring to?

12 A. Well, [REDACTED] went around telling everybody that  
13 she was going to have me arrested and she was going to  
14 have her parents press charges against me because of  
15 everything that took place. So once I found out about  
16 that, I pretty much let her know -- let her know that I  
17 knew what was going on.

18 Q. Okay. How did you hear about that?

19 A. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 Q. So you heard from [REDACTED] that [REDACTED] was telling  
2 people [REDACTED] that she was going to press charges  
3 or somebody from her family was going to press charges?

4 A. That's correct.

5 Q. Made you upset?

6 A. Shocked.

7 Q. Made you mad?

8 A. No. Shocked.

9 Q. Okay. Weren't mad at her at all for this?

10 A. Shocked.

11 Q. Do you recall her saying in response: "I  
12 don't even live with my dad anymore?"

13 A. I don't remember that.

14 Q. It says here on line 15: "Oh, well. I don't  
15 know. It was going around that you were going to press  
16 charges and get me in trouble and shit."

17 Do you remember saying something like that?

18 A. I don't remember. Like I said, this was years  
19 ago. I can't recall it.

20 Q. Okay. Despite what may have been said, do you  
21 recall mentioning to her that you would call Jeffrey and  
22 see if you could set it up?

23 A. I don't recall that, either.

24 Q. Because it appears on the next page, line 5,  
25 you say: "Okay. I'll definitely give you a call

1 tomorrow."

2 Do you remember saying anything like that?

3 A. I don't, no.

4 Q. Okay. Did you have any further conversations  
5 with [REDACTED] about Jeffrey after this phone call, that you  
6 can recall?

7 A. I don't ever recall her -- I don't ever recall  
8 calling her back after this took place. I don't ever  
9 recall setting up another appointment with Epstein. I  
10 could have just been telling her what she wanted to  
11 hear.

12 Q. Do you think that if it hadn't been for [REDACTED],  
13 that this would have never -- "this," being, the  
14 criminal and civil and all this other stuff -- would  
15 have never happened?

16 MR. CRITTON: Form.

17 MS. [REDACTED]: Objection. You're asking her to  
18 speculate.

19 THE WITNESS: I don't know.

20 BY MR. [REDACTED]:

21 Q. Before I had asked you about who was paying  
22 for your civil attorneys. Do you recall those  
23 questions?

24 A. Yeah, I do.

25 Q. Going back to that subject for a moment. Was

1 your mom ever with you when you had conversations with  
2 the civil attorneys?

3 A. No.

4 Q. Physically present in the room at any point?

5 A. No.

6 Q. Does your mom know who's paying for the civil  
7 attorneys?

8 A. Yes.

9 Q. How does she know?

10 A. I told her.

11 Q. What did you tell her?

12 A. I told her what I was told.

13 Q. Which was?

14 A. I told her that my attorney was being paid by  
15 Mr. Epstein.

16 Q. Why is he paying for your civil attorney, if  
17 you know?

18 A. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

23 MS. [REDACTED]: I'm going to stop you there. If  
24 anything beyond this point is specifically with  
25 regard to conversations you've had with [REDACTED]

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 and [REDACTED] and/or myself, I do not want you  
2 to disclose any of the information.

3 THE WITNESS: Okay.

4 And [REDACTED] took us to [REDACTED]. [REDACTED]

[REDACTED]

[REDACTED]

7 BY Mr. [REDACTED]:

8 Q. I don't want to know about conversations  
9 you've had with the civil attorneys.

10 But why did you think -- you -- think that you  
11 needed civil attorneys to help you in this process?

12 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 BY MR. [REDACTED]:

21 Q. And I don't want to know anything the lawyers  
22 said to you. I want to know why you think you need  
23 civil attorneys for something --

24 MS. [REDACTED]: And if the reason is because  
25 your criminal or civil attorney told you, you need

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 a civil attorney, you do not need to disclose that  
2 reason.

3 THE WITNESS: Okay.

4 I'm going to plead the Fifth on that one.

5 MS. [REDACTED]: You don't have to plead the  
6 Fifth.

7 THE WITNESS: Whatever. This is confusing.  
8 I'm not answering it.

9 MS. [REDACTED]: No. You do not need to answer  
10 that.

11 THE WITNESS: I'm not answering it.

12 MS. [REDACTED]: If it is -- if it is a  
13 conversation you had with one of your attorneys,  
14 you do not need to disclose any of that  
15 conversation. That is all privileged.

16 BY MR. [REDACTED]:

17 Q. So we can avoid conversations you've had with  
18 attorneys, let's just talk about family now.

19 A. Uh-huh.

20 Q. You're over the age of 18. You're an adult.  
21 But you still, nonetheless, had conversations with your  
22 mother and your father about this whole thing, I assume?

23 A. Yes.

24 Q. Did you talk to them about having an attorney  
25 present for your deposition here today?

1 A. Of course.

2 Q. Okay. And, in fact, your mom was here  
3 earlier?

4 A. Yes.

5 Q. Okay. I assume you had a conversation with  
6 her about why you felt you would need an attorney here  
7 today. Did you?

8 A. No.

9 Q. Never talked to her about why you'd be  
10 represented by a lawyer here at this deposition?

11 A. Me and my mom never had a conversation like  
12 that, no.

13 Q. You mentioned life savings and retirement and  
14 all that.

15 A. Uh-huh.

16 Q. Did that get used up with respect to the  
17 criminal proceeding, --

18 A. Yes.

19 Q. -- paying the criminal lawyers?

20 A. Yes.

21 Q. Did you come out of pocket at all to help pay  
22 for the criminal lawyers?

23 A. Not me, personally, no.

24 Q. Your parents paid for that?

25 A. That's correct.

1 Q. All right. Has anyone told you, other than  
2 the lawyers, that there is no concern for criminal  
3 prosecution, as you sit here today, other than what the  
4 civil or criminal lawyers have told you? In other  
5 words, did a -- did your parents tell you that you don't  
6 have to worry about criminal prosecution anymore? Did  
7 any witnesses tell you that? Anything like that?

8 A. Yes.

9 Q. Who?

10 A. My father.

11 Q. What did he say?

12 A. Just told me that the criminal part is pretty  
13 much over. This is the civil part. This is where  
14 things get ugly, messy, and then it will all be  
15 finished.

16 Q. Okay. All right. What did your father think  
17 of this when this whole thing broke open?

18 MR. CRITTON: Form.

19 THE WITNESS: I don't know.

20 BY MR. [REDACTED]:

21 Q. Did you talk to him about it? I mean, you  
22 obviously had to inform him after you went and talked to  
23 the police?

24 A. I did.

25 [REDACTED]

1

█

█

4

Q. What was his reaction?

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

MR. CRITTON: Object to form. The question serves no purpose, other than you're trying to harass her and intimidate her or make her life miserable at this point.

MS. █: And I'm allowing a little bit, but not much more.

MR. █: Actually, I'm not. I'm showing what the common, ordinary individual's reaction would be to a man molesting a 16 year old little girl, if you really want to get into it.

MR. CRITTON: Same.

BY MR. █:

Q. What did your father think of all this when you told him about what had happened?

A. He cried.

Q. Did he blame you?

MR. CRITTON: Form.

MS. █: Objection. And I'm going to instruct her not to answer that question.

MR. █: Come on.

MS. █: I don't think it's relevant to

1 this case.

2 MR. [REDACTED]: I'll tell you exactly why it's  
3 relevant.

4 MR. CRITTON: Let her finish.

5 MR. [REDACTED]: I'm sorry. Go ahead.

6 MS. [REDACTED]: She's not a Plaintiff. She's  
7 not a Defendant. She has not put her character at  
8 issue. This is a private matter. It serves no  
9 purpose, other than to upset and harass her, as you  
10 can see it's doing right now.

11 MR. [REDACTED]: I have no intent to upset her or  
12 harass her. But when a pervert like Jeffrey  
13 Epstein is molesting 16 year old girls, I have  
14 every right to ask a girl who's been through it  
15 what it made ordinary people think of. And when  
16 he's saying in defense to the civil action that  
17 these girls had it coming to them because they  
18 volunteered for it, I'm curious what an ordinary  
19 individual's parent would think, much like all of  
20 the other girls that were brought to this home for  
21 this man to molest.

22 MS. [REDACTED]: You have not noticed her father  
23 or her mother for deposition today.

24 MR. [REDACTED]: And I don't want to have to go  
25 there.

1 MS. [REDACTED]: You're asking her how her  
2 parents feel. You're asking her to speculate as to  
3 how her parents feel. And that serves no other  
4 purpose than to --

5 MR. [REDACTED]: I don't want to know what her  
6 parents felt. I want to know what her parents'  
7 reaction was that she witnessed and heard. And I  
8 think that's entirely relevant to, not only the  
9 claims in this case, but the defenses that have  
10 been raised by Mr. Epstein.

11 MR. CRITTON: Let me add to my form objection.  
12 It is, number one, I object to your speech. I  
13 think it was inappropriate.

14 Number two is, many of the Plaintiffs' lawyers  
15 have fought me even getting this kind of  
16 information from Plaintiffs in this case, less some  
17 witness who has -- is neither a party, nor has any  
18 involvement in the case, other than is a  
19 third-party witness.

20 So I would suggest, is that, with the  
21 difficulty and the fighting that I've had from  
22 Plaintiffs' lawyers to get responses to those  
23 questions, I'm not sure that either Judge Hafele in  
24 this particular -- Judge Hafele, who I think will  
25 have an opportunity to look at this record if it's

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

1 brought in front of him, would necessarily find  
2 that that's appropriate questioning. But that's  
3 just my form objection. And obviously she has  
4 her -- she has her own lawyer that's going to  
5 instruct her to do, so you and I can talk as long  
6 as we want, but it's not going to change her  
7 lawyer's directions, I assume.

8 MS. [REDACTED]: I'm instructing you not to  
9 answer that question now absent a Court Order.

10 (Brief interruption.)

11 MR. [REDACTED]: Hello.

12 MR. [REDACTED]: Yes. I'm calling in to take  
13 [REDACTED] place.

14 MR. [REDACTED]: He's sitting right here.

15 MR. [REDACTED]: Does that mean I'm out, [REDACTED]?

16 MR. [REDACTED]: You're out.

17 MR. [REDACTED]: All right, buddy.

18 MR. [REDACTED]: The A team is coming in.

19 MR. CRITTON: I'd like that on the record,  
20 please.

21 MR. [REDACTED]: All right. I'm going to shut it  
22 down, but, [REDACTED], you have -- you have the baton, so  
23 to speak.

24 MR. [REDACTED]: Okay.

25 BY MR. [REDACTED]:

1 Q. All right. I'm going to ask the question and  
2 a lawyer, your lawyer is going to either let you respond  
3 or not let you respond, so just wait, if you would.

4 You already told us that when you told your  
5 father about what had happened with Jeffrey Epstein that  
6 he cried. What I'm asking now is: What did he say to  
7 you; in other words, did he say, it's your fault? Did  
8 he blame you?

9 MS. [REDACTED]: Objection. Predicate.

10 Relevance. And I believe these questions serve no  
11 purpose, other than to harass and upset Ms. [REDACTED],  
12 who, again, is not a Plaintiff or a Defendant.  
13 She's merely a witness and should not be subjected  
14 to what she's going through right now. Absent a  
15 Court Order, I'm asking her to refrain from  
16 answering those questions. And I'd also ask for a  
17 break, if we could take one, so she can compose  
18 herself.

19 MR. [REDACTED]: Okay. I'll definitely give you  
20 the break. I certainly don't think I'm harassing,  
21 but I'll give you the break.

22 VIDEOGRAPHER: Going off the record on tape  
23 number two. The time is 2:57 p.m.

24 (Brief recess.)

25 (Deposition continued to Volume II.)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CERTIFICATE OF OATH

STATE OF FLORIDA  
COUNTY OF PALM BEACH

I, the undersigned authority, certify that  
[REDACTED] [REDACTED] personally appeared before me and was duly  
sworn on the 10th day of November, 2009.

Dated this 20th day of November, 2009.

*Sandra Townsend*



Sandra W. Townsend, Court Reporter  
Notary Public - State of Florida  
My Commission Expires: 6/26/12  
My Commission No.: DD 793913

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

Electronically signed by Sandra Townsend (401-377-676-2895)  
Electronically signed by Sandra Townsend (401-377-676-2895)

1f88f113-5663-4dad-94e7-90ffb7174075  
3501.182-102  
Page 155 of 156

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**

EFTA\_00094501

EFTA01248161

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

C E R T I F I C A T E

STATE OF FLORIDA  
COUNTY OF PALM BEACH

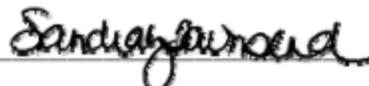
I, Sandra W. Townsend, Court Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that the aforementioned witness was by me first duly sworn to testify the whole truth; that I was authorized to and did report said deposition in stenotype; and that the foregoing pages numbered 1 to 154, inclusive, are a true and correct transcription of my shorthand notes of said deposition.

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

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

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

Dated this 20th day of November, 2009.

  
\_\_\_\_\_  
Sandra W. Townsend, Court Reporter

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

Electronically signed by Sandra Townsend (401-377-676-2895)  
Electronically signed by Sandra Townsend (401-377-676-2895)

1f88f113-5663-4dad-94e7-90ffb7174075  
3501.182-102  
Page 156 of 156

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**