

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.08-CIV-80811-MARRA-JOHNSON

CAROLYN MARGARET ANDRIANO

Plaintiff,

-vs-

JEFFREY EPSTEIN and SARAH
KELLEN,

Defendants.

DEPOSITION OF SUSAN POPE

Thursday, August 13th, 2009
10:10 - 12:50 p.m.

515 North Flagler Drive
Suite 400
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida

"A"

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1 know the names of the individuals that are keeping the
 2 two children, that is Carolyn Andriano's kids in Texas?

3 A. No.

4 MR. PIKE: I have no further questions.

5 MR. HILL: I have one. And it might end up
 6 being two.

7 CROSS (SUSAN POPE)

8 BY MR. HILL

9 Q. You were asked a very long while ago about
 10 whether Carolyn was addicted to I think it was Xanax.
 11 And you responded by saying she's used since she was in
 12 the sixth grade. I just want to clarify, is it your
 13 position that Carolyn has been addicted to Xanax since
 14 she was in middle school?

15 A. No, not, I mean, she, she has got a very
 16 addictive personality. So whether it's drugs or
 17 something else, I don't think she's totally been
 18 addicted to one thing the whole time.

19 MR. HILL: That's all I have.

20 MR. PIKE: The documents that you sent to me
 21 today I am handing to you. These are the ones that
 22 you have produced to Mr. Hill and to me pursuant to
 23 the subpoena, correct?

24 THE WITNESS: Correct.

25 MR. PIKE: Let's mark these as Composite

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1 REDIRECT (SUSAN POPE)

2 BY MR. PIKE

3 Q. Okay. One final question. With regard to the
 4 records that you have produced to me today, which I am
 5 going to hand to you, as well as the records that we
 6 have been discussing and which have been marked as an
 7 exhibit, can you identify for me anywhere in those
 8 records where Carolyn Andriano indicated at one time or
 9 another that she had been sexually assaulted or battered
 10 by a gentleman by the name of Jeffrey Epstein?

11 MR. HILL: Object to the form.

12 THE WITNESS: No.

13 BY MR. PIKE

14 Q. And that's because it doesn't exist in those
 15 records, correct?

16 A. Correct.

17 MR. PIKE: No further questions.

18 (A discussion was held off the record.)

19 THE COURT REPORTER: Are you ordering this?

20 MR. PIKE: I am ordering.

21 THE COURT REPORTER: Since he is ordering, I
 22 am going to type this into a booklet. Would you
 23 like to read it or waive that right?

24 THE WITNESS: I am going to waive that right.

25 THE COURT REPORTER: Would you like a copy?

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1 Exhibit A-16.

2 MR. HILL: Were those records actually given
 3 to you --

4 MR. PIKE: Stay on the record.

5 MR. HILL: -- by Parent Child? Did you send
 6 records --

7 MR. PIKE: She brought the set.

8 THE WITNESS: I brought those today.

9 MR. HILL: Okay.

10 MR. PIKE: And the ones that I have been
 11 questioning from are the ones that you have
 12 recently sent to me, Jack, from your office earlier
 13 this week.

14 MR. HILL: Right. But, I don't, I think there
 15 was -- I know there was that mixup and you guys got
 16 some records that you had sent to me and I sent
 17 back to you. But I don't think Parent Child was
 18 one of those sets. I think you just got them from
 19 me.

20 MR. PIKE: Yes.

21 MR. HILL: So, it didn't go from you to me
 22 back to you, which I think you said that earlier.

23 MR. PIKE: I thought that they were part of
 24 those.

25 MR. HILL: I don't think so.

1 MR. HILL: Yes.

2 (Witness excused.)

3 (Deposition was concluded.)

4 (Exhibits retained by Mr. Pike.)

7 CERTIFICATE OF OATH

8 STATE OF FLORIDA

9 COUNTY OF PALM BEACH

12 I, the undersigned authority, certify that
 13 SUSAN POPE personally appeared before me and was duly
 14 sworn.

16 Dated this 14th day of August, 2009.

19 *Cynthia J. Hopkins*

21 Cynthia Hopkins, RPR, FPR

22 Notary Public - State of Florida

23 My Commission Expires: February 25, 2011

24 My Commission No.: DD 643788

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