

# EXHIBIT 8

## (Filed Under Seal)

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL  
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO:502008CA028051XXXXMB AB

L.M.

Plaintiff,

-vs-

JEFFREY EPSTEIN  
AND SARAH KELLEN,

Defendants.

\_\_\_\_\_ /

DEPOSITION OF JANUSZ BANASIAK

Tuesday, February 16, 2010  
10:09 - 2:30 p.m.

250 Australian Avenue South  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
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Job No.: 1317

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

1           A.    One was in cabana. One, the other second one  
2           was in living room and one was in small office next to  
3           the kitchen.

4           Q.    All right. In your time at the house  
5           prior to that, is it fair to say those computers had  
6           never been removed before?

7           A.    I remember that there was to bring some new  
8           ones to replace them at some point. I don't know  
9           remember exactly if it was for upgrading, but they  
10          change computers very often I would say.

11          Q.    All right. But the computers -- the  
12          removal by Adriana and this individual, that wasn't  
13          done -- we're talking about a different -- that's  
14          not a time where they were replacing computers.  
15          This was just removing computers from the house?

16          A.    Yes.

17          Q.    And did you receive any explanation as to  
18          why the computers were being removed from the house?

19          A.    No.

20          Q.    Did you ever have occasion to use any of  
21          the three computers that were removed from the  
22          house?

23          A.    No. I never, I never, you know, touch them,  
24          never use them. I have my own computer in my office, so  
25          I use this computer.

1 Q. Is your computer in your office --

2 A. Yes.

3 Q. Let me finish. Is the computer in your  
4 office linked up with the three computers that were  
5 removed from the house? Meaning, can you look at  
6 the system and see what is on those three computers?

7 A. No, no.

8 Q. Is it your understanding that those three  
9 computers are linked with one another or do you  
10 know?

11 A. I don't know, but I, I doubt it. They are  
12 separate I guess.

13 Q. Okay. Were you aware that Mr. Epstein  
14 used a Citrix program to link various computers?  
15 Did you know that?

16 A. Yeah. I use Citrix too in my computer for  
17 exchanging e-mails and get through Internet.

18 Q. Okay. So, is it your understanding that  
19 the only connection then through Citrix with these  
20 computers, these various computers that were in  
21 Mr. Epstein's home, was for e-mail purposes?

22 A. Yes.

23 Q. Okay. To your knowledge, you're not  
24 familiar with those computers sharing other files or  
25 information?

1 A. No.

2 Q. That's not something that you were, you  
3 were privy to? You weren't, you weren't in the loop  
4 of the sharing of information in the house in terms  
5 of the computers being connected through any server?

6 A. I don't really know what, how, how to answer  
7 your question because Citrix is for the whole  
8 organization to exchange e-mail between employees.

9 Q. All right. You used the term?

10 A. So, even my computer is connected to Citrix.  
11 I can receive mail and I can e-mail information to  
12 employee within organization. But I don't know if you  
13 can see to each computer what is going on on another  
14 computer.

15 Q. You don't know about --

16 A. Is that your question?

17 Q. You don't know about shared files?

18 A. No.

19 Q. You only know that the one computer can  
20 e-mail the other?

21 A. Right.

22 Q. But that can happen with any two computers  
23 in the world pretty much. You can send e-mails to  
24 each other, right.

25 A. Yes.

1 Q. You have used the term organization, you  
2 can share within the organization. What do you --  
3 just so I can understand what you're calling the  
4 organization, what do you mean by that word?

5 A. People employed by Jeffrey Epstein. There are  
6 a few groups of people, his office in New York and I  
7 guess --

8 Q. Who are those people by name that you  
9 would consider within the Jeffrey Epstein  
10 organization?

11 A. His accountant, his --

12 Q. Who is that?

13 A. Bella Klen.

14 Q. What is it?

15 A. Bella Klen. K-l-i-n. E-n, I'm sorry.

16 Q. Bella, B-e-l-l-a?

17 A. Yes.

18 Q. Is that somebody in New York?

19 A. Yes.

20 Q. Is that a male or female?

21 A. Female.

22 Q. And you understand that's his accountant?

23 A. Right.

24 MR. GOLDBERGER: Just to get the spelling  
25 correct is it K-l-e-i-n?

1 THE WITNESS: K-l-e-n.

2 MR. MERMELSTEIN: K-l-e-n.

3 BY MR. EDWARDS:

4 Q. And in addition to Bella Klen, who else  
5 would you have considered to be in Jeffrey Epstein's  
6 organization?

7 A. Rich Kahn. Richard Kahn.

8 Q. And how do you spell the last name?

9 A. K-a-h-n.

10 Q. And where is he located?

11 A. New York office.

12 Q. What does he do?

13 A. I guess he was involved with the accounting.

14 Q. And who else?

15 A. Leslie. I would think I would say secretary.

16 Q. Leslie Groff?

17 A. Yes.

18 Q. And is she also in the New York office?

19 A. Yes.

20 Q. What do you understand her role to be?

21 A. Secretary I would say.

22 Q. Did she also schedule appointments for  
23 these young females to come to Jeffrey Epstein's  
24 house?

25 MR. GOLDBERGER: Form.

1 THE WITNESS: I don't know.

2 BY MR. EDWARDS:

3 Q. We'll go back to that but I tell you why I  
4 ask. If you don't know then you don't know, but in  
5 the course of Mr. Epstein's -- you're aware that he  
6 did plead guilty to a couple felonies in state  
7 court, right?

8 A. Right.

9 Q. Well, in the course of the negotiation  
10 with the federal government and the U.S. Attorney's  
11 Office, they, the agreement between Mr. Epstein and  
12 the U.S. Attorney's office mentions people that are  
13 called co-conspirators of Epstein. And Leslie Groff  
14 is named as one of those co-conspirators.

15 Do you know what involvement, if any, that  
16 she had with the crimes that were being  
17 investigated?

18 A. No.

19 Q. Okay.

20 A. I am not aware of this.

21 Q. Okay. The other people mentioned as  
22 co-conspirators are Sarah Kellen, Adriana Ross, and  
23 Nadia Marcinkova. So we'll get to them in a minute  
24 but first just so we stay on the track of who was in  
25 the organization, is Sarah Kellen, Adriana Ross and



1       Nadia Marcinkova all people that you would also  
2       consider within the organization?

3             A.    Yes.

4             Q.    Okay.  So, we just added three more names  
5       to it.  Who else would you consider, Ghislaine  
6       Maxwell?

7             A.    Yes.

8             Q.    And who else?

9             A.    Who was working there?

10            Q.    Bella, Richard Kahn, Leslie Groff,  
11       Ghislaine Maxwell, Nadia, Sarah, Adriana.

12            A.    I think Harry was involved with the  
13       accounting.

14            Q.    Okay.

15            A.    I don't recall his last name.

16            Q.    Somebody else involved with the  
17       accounting?

18            A.    Yes.

19            Q.    Okay.  Any of those people that you just  
20       named, were any of those people that you just named  
21       the person that you described as the gentleman that  
22       assisted Adriana in removing the computers from the  
23       house prior to the search warrant being executed?

24            A.    No.  You mean the one who show up to do those  
25       computers?

1 Q. Right. The one who helped Adriana move  
2 it.

3 A. No, it wasn't.

4 Q. Had you ever seen that individual on the  
5 property, on Mr. Epstein's property at 358 Albrillo  
6 Way prior to him assisting Adriana in removing the  
7 computers from the home?

8 A. No.

9 Q. That was their first time seeing him?

10 A. Yes.

11 Q. Had you ever seen him since that date?

12 A. No.

13 Q. And to this date you don't know who that  
14 individual was?

15 A. No.

16 Q. Were you told that the -- let me rephrase  
17 that. I guess you told me that anything that  
18 happened in the home in terms of guests coming over  
19 or things of that nature, you would be forewarned  
20 about it, right?

21 A. Right.

22 Q. So, when was the first time that you  
23 learned that Adriana and some gentleman that you had  
24 never met would be coming to the home to remove the  
25 computers?

1           A.    I got the phone call from her that there would  
2           be -- I don't know what time it was in the house in  
3           certain time and they would pick up those computers.

4           Q.    Okay. And you got a phone call from  
5           Adriana?

6           A.    Right.

7           Q.    Why were you called by Adriana to tell you  
8           that Adriana and would be coming over to, with some  
9           other gentleman to remove the computers. Do you  
10          know why you were told that?

11          A.    No.

12          Q.    Would Adriana call every time she would  
13          come over?

14          A.    Yes.

15          Q.    Okay.

16          A.    I mean, any, any time coming to the house,  
17          they always let me know who is coming when they are  
18          arriving or whatever.

19          Q.    Back in 2000, sorry.

20          A.    I said even if Jeffrey Epstein arriving at the  
21          house, I always know what time and which day he would be  
22          here or another person, so I would be aware of what was  
23          going on and I would be prepared.

24          Q.    Who besides you back in 2005 lived at the  
25          house full time; just you?

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CERTIFICATE OF OATH

THE STATE OF FLORIDA  
COUNTY OF PALM BEACH

I, the undersigned authority, certify that  
JANUSZ BANASIAK personally appeared before me  
and was duly sworn on the 16th day of February,  
2010.

Dated this 28th day of February, 2010.

*Cynthia I. Hopkins*



Cynthia Hopkins, RPR, FPR  
Notary Public - State of Florida  
My Commission Expires: February 25, 2011  
My Commission No.: DD 643788