

EXHIBIT 11

PART 1

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,
Plaintiff,
-vs- VOLUME I OF III
JEFFREY EPSTEIN,
Defendant.

Related cases:
08-80232, 08-08380, 08-80381, 08-80994
08-80993, 08-80811, 08-80893, 09-80469
09-80591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF
SARAH KELLEN

Wednesday, March 24, 2010
10:37 - 6:51 p.m.

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

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting Services
Job No.: 1484

Page 2

1 IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
2 IN AND FOR PALM BEACH COUNTY, FLORIDA
3 CASE NO. 502008CA028058XXXXMB AD

4 E.W.,
5 Plaintiff,
6 -vs- VOLUME I OF III
7 JEFFREY EPSTEIN,
8 Defendant.

9 VIDEOTAPED DEPOSITION OF
10 SARAH KELLEN

11 Wednesday, March 24, 2010
12 10:37 - 6:51 p.m.

13 250 Australian Avenue South
14 Suite 1500
15 West Palm Beach, Florida 33401

16 Reported By:
17 Cynthia Hopkins, RPR, FPR
18 Notary Public, State of Florida
19 Prose Court Reporting Services
20 Job No.: 1484

1 IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
2 IN AND FOR PALM BEACH COUNTY, FLORIDA
3 CASE NO. 502008CA028051XXXXMB AB

4 L.M.,
5 Plaintiff,
6 -vs- VOLUME I OF III
7 JEFFREY EPSTEIN,
8 Defendant.

9
10
11 VIDEOTAPED DEPOSITION OF
12 SARAH KELLEN
13
14
15 Wednesday, March 24, 2010
16 10:37 - 6:51 p.m.

17 250 Australian Avenue South
18 Suite 1500
19 West Palm Beach, Florida 33401

20 Reported By:
21 Cynthia Hopkins, RPR, FPR
22 Notary Public, State of Florida
23 Prose Court Reporting Services
24 Job No.: 1484

Page 4

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

4 B.B.,
5 Plaintiff,
6 -vs- VOLUME I OF III
7 JEFFREY EPSTEIN
8 AND SARAH KELLEN,
9 Defendants.

10 VIDEOTAPED DEPOSITION OF
11 SARAH KELLEN
12
13
14 Wednesday, March 24, 2010
15 10:37 - 6:51 p.m.

16 250 Australian Avenue South
17 Suite 1500
18 West Palm Beach, Florida 33401

19 Reported By:
20 Cynthia Hopkins, RPR, FPR
21 Notary Public, State of Florida
22 Prose Court Reporting Services
23 Job No.: 1484

24 1 (Pages 1 to 4)

Page 5	Page 7
1 APPEARANCES: 2 On behalf of the Plaintiffs, B.B.: 3 SPENCER T. KUVIN, ESQUIRE LEOPOLD KUVIN 4 2925 PGA Boulevard Suite 200 5 Palm Beach Gardens, Florida 33410 Phone: 561.515.1400 6 7 On behalf of the Plaintiffs, L.M., E.W. and Jane Doe: 8 9 MATTHEW WEISSING, ESQUIRE FARMER, JAFFE, WEISSING, EDWARDS 10 FISTOS & LEHRMAN, P.L. 425 North Andrews Avenue 11 Suite 2 Fort Lauderdale, Florida 33301 Phone: 954.524.2820 12 On behalf of Jane Does 1 through 8: 13 ADAM D. HOROWITZ, ESQUIRE MERMELSTEIN & HOROWITZ, P.A. 14 18205 Biscayne Boulevard Suite 2218 15 Miami, Florida 33160 Phone: 305.931.2200 16 E-mail: Ahorowitz@sexabuseattorney.com 17 On behalf of the Plaintiffs, 101, 102 and 103: 18 KATHERINE W. EZELL, ESQUIRE AMY JOSEFSBERG EDERI, ESQUIRE 20 PODHURST ORSECK 25 West Flagler Street 21 Suite 800 Miami, Florida 33130 22 Phone: 305.358.2800 23 (Via telephone) 24 25	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
Page 6	Page 8
1 Appearances continued... 2 On behalf of the Plaintiff, Jane Doe II: 3 ISIDRO MANUEL GARCIA, ESQUIRE GARCIA, ELKINS & BOEHRINGER 4 224 Datura Avenue, Suite 900 West Palm Beach, Florida 33401 Phone: 561.832.8033 5 6 7 On behalf of the Defendant: 8 JACK ALAN GOLDBERGER, ESQUIRE ATTERBURY, GOLDBERGER & WEISS, P.A. 9 250 Australian Avenue South Suite 1400 10 West Palm Beach, Florida 33401-5012 Phone: 561.659.8300 11 12 13 On behalf of the Witness: 14 BRUCE E. REINHART, ESQUIRE LAW OFFICE OF BRUCE E. REINHART 15 One Clearlake Center 250 South Australian Avenue, Suite 1400 16 West Palm Beach, Florida 33401 Phone: 561.202.6360 17 18 19 20 ALSO PRESENT: 21 Jessica Cadwell, Paralegal Burman, Critton, Luttier & Coleman, P.A. 22 Joseph Kozak, Videographer Prose Court Reporting Services 23 24 25	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

2 (Pages 5 to 8)

Page 9

1 MR. GARCIA: Sid Garcia for Jane Doe,
 2 Roman Numeral II.
 3 MR. GOLDBERGER: Jack Goldberger on behalf
 4 of Jeffrey Epstein.
 5 MS. CADWELL: Jessica Cadwell, paralegal,
 6 on behalf of Jeffrey Epstein.
 7 MR. RHEINHART: Bruce Rheinhart on behalf
 8 of the witness, Sarah Kellen.
 9 MR. KUVIN: Kathy, your turn.
 10 MS. EZELL: Okay. Kathy Ezell and Amy
 11 Ederi on behalf of Plaintiff, Jane Doe 103.
 12 Thereupon,

13 (SARAH KELLEN)

14 Having been first duly sworn or affirmed, was
 15 examined and testified as follows:

16 DIRECT EXAMINATION

17 BY MR. KUVIN:

18 Q. Good morning.
 19 A. Morning.
 20 Q. Could you give us your full name, please.
 21 A. Sarah Kellen.
 22 Q. Do you have a middle name?
 23 A. Lynnelle.
 24 Q. Would you spell that for us?
 25 A. L-y-n-n-e-l-l-e.

Page 10

1 Q. What's your current address?
 2 MR. RHEINHART: I'm going to instruct the
 3 witness not to answer that question on the
 4 basis of her Fifth and 14th Amendment
 5 privileges against self-incrimination.

6 MR. KUVIN: Okay. We had spoken before
 7 with respect to there are likely going to be
 8 answers similar to that throughout this
 9 deposition. I have agreed to a procedure that
 10 we can do a shortened answer. However you want
 11 to handle that, I leave it up to you. But I do
 12 agree that whatever the shortened answer is,
 13 that it will satisfy the length, lengthy answer
 14 that she would like to give.

15 So, do we want to do that with this
 16 question, or how do you want to handle
 17 that procedurally?

18 MR. RHEINHART: Well, I think I have given
 19 the instruction. I think she, will give her
 20 the same instruction in the future to the
 21 extent that it's relevant, and I think that if
 22 we can all just agree that if she simply says
 23 or I simply say "The Fifth Amendment," that
 24 will qualify as giving a sufficient answer to
 25 -- as a matter of law, and will invoke that

Page 11

1 privilege.
 2 MR. KUVIN: I'll agree with that
 3 procedure.

4 MR. RHEINHART: Anyone object to that
 5 procedure?

6 MR. GOLDBERGER: Actually I think if, in
 7 fact, this deposition is used in a trial, I
 8 think you would want the lengthier answer as
 9 being the answer that is played to the jury.
 10 So either you guys can agree that it gets cut
 11 in or she's going to have to -- I can't tell
 12 you what to do, but I would suggest that she
 13 give the lengthier answer each time.

14 But there's got to be a way that you
 15 guys can reach an agreement though, that
 16 from a technology perspective, that the
 17 lengthy answer that she just gave would be
 18 used during any trial testimony. Can that
 19 be done?

20 MR. KUVIN: I don't know procedurally
 21 whether it can be done.

22 MR. GOLDBERGER: I think --

23 MR. KUVIN: I don't know that, well --

24 MR. GOLDBERGER: And again, it's not my,
 25 it's not my deal. I'm just telling you how

Page 12

1 we've done it in the past.

2 MR. KUVIN: I hear you, and I have a
 3 number of issues primary, primarily of which
 4 that you're not here to represent anyone
 5 currently.

6 MR. GOLDBERGER: Yeah, I am. I'm
 7 actually, I'm actually here representing
 8 Jeffrey Epstein, so...

9 MR. KUVIN: Okay. With respect to all the
 10 civil cases, though, you're not here to
 11 represent anyone, so --

12 MR. GOLDBERGER: Yes, I am.

13 MR. KUVIN: With the exception --

14 MR. GOLDBERGER: I represent -- I am -- I
 15 don't mean to interrupt you, but I am counsel
 16 of record in the civil cases.

17 MR. KUVIN: Okay. Okay.

18 MR. RHEINHART: If we have a stipulation,
 19 what's the problem? Are you --

20 MR. KUVIN: There is none.

21 MR. RHEINHART: -- worried about a waiver?

22 MR. GOLDBERGER: No, I'm not worried about
 23 that at all. I'm worried about what is played
 24 to a jury if this gets tried.

25 MR. KUVIN: Okay. And I appreciate you

3 (Pages 9 to 12)

Page 13

Page 15

1 coaching Bruce, but I think he can handle
 2 himself pretty adequately now --

3 MR. GOLDBERGER: I have --

4 MR. KUVIN: So I leave it up to Bruce --

5 MR. GOLDBERGER: I have all the confidence
 6 in Bruce.

7 MR. KUVIN: Mr. Rheinhart, with respect to
 8 how you want to handle it, I think we have an
 9 agreement.

10 MR. RHEINHART: I'm satisfied that we have
 11 a stipulation, and I assume if there is ever a
 12 trial, that would be played or produced to the
 13 jury that simply by using shorthand, what she's
 14 really saying is the lengthier answer now. I'm
 15 satisfied with that.

16 MR. KUVIN: And I agree with that.

17 BY MR. KUVIN:

18 Q. Okay. Ma'am, what is your current
 19 address?

20 MR. RHEINHART: Again, I will instruct the
 21 witness not to answer the question.

22 THE WITNESS: On the instruction of my
 23 lawyer, I choose to invoke my Fifth Amendment
 24 right.

1 BY MR. KUVIN:

2 Q. What is your current phone number?

3 MR. RHEINHART: Same instruction.

4 THE WITNESS: On the advice of my lawyer,
 5 I choose to invoke my Fifth Amendment right.

6 BY MR. KUVIN:

7 Q. What is your cellphone number?

8 MR. RHEINHART: Same instruction --

9 THE WITNESS: On the advice of my lawyer,
 10 I choose to invoke my Fifth Amendment right.

11 MR. RHEINHART: You have to let me speak
 12 before you answer in case there's an objection
 13 or any of the other lawyers have an objection.

14 BY MR. KUVIN:

15 Q. I am going to show you a photograph. Oh,
 16 what is your date of birth?

17 MR. RHEINHART: Same instruction.

18 THE WITNESS: On the advice of my lawyer,
 19 I choose to invoke my Fifth Amendment right.

20 MR. KUVIN: Let's make it easier.

21 BY MR. KUVIN:

22 Q. Ms. Kellen, would you agree with me that
 23 your date of birth is May 25th, 1979?

24 MR. RHEINHART: Same instruction.

25 THE WITNESS: On the advice of my lawyer,

1 I choose to invoke my Fifth Amendment right.

2 BY MR. KUVIN:

3 Q. Would you agree with me that you're
 4 approximately 5 feet, 8 inches tall?

5 MR. RHEINHART: Same instruction.

6 THE WITNESS: On the advice of my lawyer,
 7 I must invoke my Fifth Amendment right.

8 BY MR. KUVIN:

9 Q. Would you agree with me that your eyes are
 10 hazel?

11 MR. RHEINHART: Same instruction.

12 THE WITNESS: On the advice of my lawyer,
 13 I choose to invoke my Fifth Amendment right.

14 BY MR. KUVIN:

15 Q. Would you agree with me that you were born
 16 in Hawaii?

17 MR. RHEINHART: Same instruction.

18 THE WITNESS: On the advice of my lawyer,
 19 I choose to invoke my Fifth Amendment right.

20 BY MR. KUVIN:

21 Q. What are the names of your parents?

22 MR. RHEINHART: Same instruction.

23 THE WITNESS: On the advice of my lawyer,
 24 I must invoke my Fifth Amendment right.

Page 14

Page 16

1 BY MR. KUVIN:

2 Q. What is your current phone number?

3 MR. RHEINHART: Same instruction.

4 THE WITNESS: On the advice of my lawyer,
 5 I choose to invoke my Fifth Amendment right.

6 BY MR. KUVIN:

7 Q. What is your cellphone number?

8 MR. RHEINHART: Same instruction --

9 THE WITNESS: On the advice of my lawyer,
 10 I choose to invoke my Fifth Amendment right.

11 MR. RHEINHART: You have to let me speak
 12 before you answer in case there's an objection
 13 or any of the other lawyers have an objection.

14 BY MR. KUVIN:

15 Q. I am going to show you a photograph. Oh,
 16 what is your date of birth?

17 MR. RHEINHART: Same instruction.

18 THE WITNESS: On the advice of my lawyer,
 19 I choose to invoke my Fifth Amendment right.

20 MR. KUVIN: Let's make it easier.

21 BY MR. KUVIN:

22 Q. Ms. Kellen, would you agree with me that
 23 your date of birth is May 25th, 1979?

24 MR. RHEINHART: Same instruction.

25 THE WITNESS: On the advice of my lawyer,

1 BY MR. KUVIN:

2 Q. Are you married or single?

3 MR. RHEINHART: Same instruction.

4 THE WITNESS: On the advice of my lawyer,
 5 I must invoke my Fifth Amendment right.

6 (Plaintiff's Exhibit No. 1 was marked for
 7 identification.)

8 MR. KUVIN: I'm going to show you what
 9 we'll mark as Plaintiff's Exhibit 1.

10 And I'll ask the videographer to zoom
 11 in here for a second.

12 BY MR. KUVIN:

13 Q. Okay. Ma'am, I am going to show you a
 14 photograph we've marked as Plaintiff's Exhibit 1 and
 15 ask you if you recognize this registered sex
 16 offender.

17 MR. RHEINHART: First, object to the form
 18 of the question. It assumes facts not before
 19 the witness, and I'll give the witness the same
 20 instruction as to that question.

21 THE WITNESS: At the advice of my lawyer,
 22 I must invoke my Fifth Amendment right.

23 BY MR. KUVIN:

24 Q. Would you agree with me that this
 25 registered sex offender's name is Jeffrey Epstein?

Page 17

1 MR. RHEINHART: Same instruction, same
2 objection.
3 THE WITNESS: At the advice of my lawyer,
4 I must invoke my Fifth Amendment right.
5 BY MR. KUVIN:
6 Q. Would you agree with me that Jeffrey
7 Epstein is a sexual offender?
8 MR. RHEINHART: Object to the form of the
9 question and instruct the witness not to answer
10 on her Fifth Amendment privilege.
11 THE WITNESS: On the advice of my lawyer I
12 must invoke my Fifth Amendment right.
13 BY MR. KUVIN:
14 Q. Would you agree with me that
15 Jeffrey Epstein sexually abused you?
16 MR. RHEINHART: Objection to the form,
17 both as to the form of the question as to
18 harassing and instruct the witness not to
19 answer, based on the Fifth Amendment privilege.
20 THE WITNESS: On the advice of my lawyer,
21 I must invoke my Fifth Amendment right.
22 BY MR. KUVIN:
23 Q. Would you agree with me that you were a
24 minor when Jeffrey Epstein first had sexual
25 relations with you?

Page 19

1 question. It's ambiguous and compound, and I
2 will instruct the witness not to answer based
3 on her Fifth Amendment privilege.
4 THE WITNESS: On the advice of my lawyer,
5 I must invoke my Fifth Amendment right.
6 BY MR. KUVIN:
7 Q. And why did you do that?
8 MR. RHEINHART: Object to the form. It's
9 ambiguous, in fact that what?
10 BY MR. KUVIN:
11 Q. Why did you bring minor girls to
12 Jeffrey Epstein for him to have sex with?
13 MR. RHEINHART: Same objection as to form
14 and instruct the witness not to answer.
15 THE WITNESS: On the advice of my lawyer,
16 I must invoke my Fifth Amendment right.
17 BY MR. KUVIN:
18 Q. What do you currently do for a job?
19 MR. RHEINHART: Instruct the witness not
20 to answer the question.
21 THE WITNESS: On the advice of my lawyer,
22 I must invoke my Fifth Amendment right.
23 BY MR. KUVIN:
24 Q. Would you agree with me that you currently
25 work for Jeffrey Epstein?

Page 18

1 MR. RHEINHART: Object to the form. It
2 assumes facts not before the witness. It is a
3 compound question and I would instruct the
4 witness not to answer based on her Fifth
5 Amendment privilege.
6 THE WITNESS: On the advice of my lawyer,
7 I must invoke my Fifth Amendment right.
8 BY MR. KUVIN:
9 Q. Would you agree with me that you have had
10 sex with Jeffrey Epstein?
11 MR. RHEINHART: Same instruction.
12 THE WITNESS: On the advice of my lawyer,
13 I must invoke my Fifth Amendment right.
14 BY MR. KUVIN:
15 Q. Would you agree with me that you first had
16 sex with Jeffrey Epstein when you were under the age
17 of 18?
18 MR. RHEINHART: Same instruction.
19 THE WITNESS: On the advice of my lawyer,
20 I must invoke my Fifth Amendment right.
21 BY MR. KUVIN:
22 Q. Would you agree with me, ma'am, that you
23 brought numerous underage girls to Jeffrey Epstein
24 so that he could have sex with them?
25 MR. RHEINHART: Object to the form of the

Page 20

1 MR. RHEINHART: Instruct the witness not
2 to answer the question.
3 THE WITNESS: On the advice of my lawyer,
4 I must invoke my Fifth Amendment right.
5 BY MR. KUVIN:
6 Q. How long have you worked for
7 Jeffrey Epstein?
8 MR. RHEINHART: Same instruction.
9 THE WITNESS: On the advice of my lawyer,
10 I must invoke my Fifth Amendment right.
11 BY MR. KUVIN:
12 Q. Would you agree with me that you've worked
13 for Jeff, Jeffrey Epstein for over 20 years as his
14 personal assistant?
15 MR. RHEINHART: Instruct the witness not
16 to answer the question.
17 THE WITNESS: On the instruction of my
18 lawyer, I must invoke my Fifth Amendment right.
19 BY MR. KUVIN:
20 Q. Would you agree with me that when you
21 first were hired by Jeffrey Epstein as his personal
22 assistant, you were under the age of 18?
23 MR. RHEINHART: Object to the form. It's
24 compound and assumes facts not present before
25 the witness, and I instruct the witness not to

Page 21

Page 23

1 answer the question based on her Fifth
 2 Amendment privilege.

3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment right.

5 BY MR. KUVIN:

6 Q. Who introduced you to Jeffrey Epstein the
 7 first time that you met him?

8 MR. RHEINHART: Same instruction.

9 THE WITNESS: On the instruction of my
 10 lawyer, I must invoke my Fifth Amendment right.

11 BY MR. KUVIN:

12 Q. Did Ghislaine Maxwell introduce you to
 13 Jeffrey Epstein for the first time?

14 MR. RHEINHART: Same instruction.

15 THE WITNESS: On the instruction of my
 16 lawyer, I must invoke my Fifth Amendment right.

17 BY MR. KUVIN:

18 Q. When was the first time you were in
 19 Jeffrey Epstein's home located on El Brillo Way on
 20 Palm Beach Island?

21 MR. RHEINHART: Object to the form of the
 22 question as compound and assuming facts not
 23 before the witness. And I instruct the witness
 24 not to answer based on her Fifth Amendment
 25 privilege.

Page 22

Page 24

1 THE WITNESS: On the instruction of my
 2 lawyer, I must invoke my Fifth Amendment right.

3 BY MR. KUVIN:

4 Q. Would you agree with me that
 5 Jeffrey Epstein owns a home at 358 El Brillo Way,
 6 Palm Beach Island, Florida?

7 MR. RHEINHART: Instruct the witness not
 8 to answer based on her Fifth Amendment
 9 privilege.

10 THE WITNESS: On instruction of my
 11 counsel, I must invoke my Fifth Amendment
 12 right.

13 BY MR. KUVIN:

14 Q. Would you agree with me that you've been
 15 in that home numerous times?

16 MR. RHEINHART: Instruct the witness not
 17 to answer the question based on her Fifth
 18 Amendment privilege.

19 THE WITNESS: On instruction of my lawyer,
 20 I must invoke my Fifth Amendment right.

21 BY MR. KUVIN:

22 Q. Would you agree with me that you have gone
 23 on Jeffrey Epstein's plane numerous times?

24 MR. RHEINHART: Object to the form. It
 25 assumes facts that are not present for the

1 witness, and I will instruct the witness not to
 2 answer based on her Fifth Amendment privilege.

3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment right.

5 BY MR. KUVIN:

6 Q. Would you agree with me that
 7 Jeffrey Epstein owns numerous planes, private
 8 planes?

9 MR. RHEINHART: Instruct the witness not
 10 to answer.

11 THE WITNESS: On the instruction of my
 12 lawyer, I must invoke my Fifth Amendment right.

13 BY MR. KUVIN:

14 Q. And you've been on every one of those
 15 private planes; isn't that true?

16 MR. RHEINHART: Object to the form. It
 17 assumes facts not before the witness, and I
 18 will instruct the witness not to answer based
 19 on her Fifth Amendment privilege.

20 THE WITNESS: On the instruction of my
 21 lawyer, I must invoke my Fifth Amendment right.

22 BY MR. KUVIN:

23 Q. Ma'am, isn't it true that you've seen the
 24 passenger manifest for Jeffrey Epstein's plane?

25 MR. RHEINHART: Object to the form. It

Page 29

1 BY MR. KUVIN:

2 Q. You also agree with me that the two girls
 3 that are listed as on that flight with you of
 4 January 11, 2005, were under the age of 15 years
 5 old?

6 MR. RHEINHART: Object to the form. It
 7 calls for speculation, lack of personal
 8 knowledge, and instruct the witness not to
 9 answer based on her Fifth Amendment privilege.

10 THE WITNESS: On the instruction of my
 11 lawyer, I must invoke my Fifth Amendment right.

12 BY MR. KUVIN:

13 Q. Would you agree with me that the two
 14 females listed as being on that flight with you of
 15 January 11 of 2005 were under the age of 14 years
 16 old?

17 MR. RHEINHART: Object to the form. It
 18 calls for speculation. The witness has no
 19 personal knowledge and instruct the witness not
 20 to answer based on her Fifth Amendment
 21 privilege.

22 THE WITNESS: On the instruction of my
 23 lawyer, I must invoke my Fifth Amendment right.

24 BY MR. KUVIN:

25 Q. Would you agree with me that the two

Page 30

1 females listed as being on the flight with you of
 2 January 11, 2005, from West Palm Beach to the U.S.
 3 Virgin Islands, with Jeffrey Epstein as well, were
 4 under the age of 13 years old and you were aware of
 5 that?

6 MR. RHEINHART: Object to the form both as
 7 compound, it also assumes facts that it has not
 8 been established this witness has any knowledge
 9 of, calls for her to speculate, and I instruct
 10 her not to answer based on her Fifth Amendment
 11 privilege.

12 THE WITNESS: On the instruction of my
 13 lawyer I must invoke my Fifth Amendment right.

14 BY MR. KUVIN:

15 Q. Who is Adriana Musinska?

16 MR. RHEINHART: I'm sorry. Can you repeat
 17 the name?

18 MR. KUVIN: Musinska, M-u-s-i-n-s-k-a.

19 MR. RHEINHART: I'll instruct the witness
 20 not to answer based on her Fifth Amendment
 21 privilege.

22 THE WITNESS: On instruction of my lawyer,
 23 I must invoke my Fifth Amendment right.

24 BY MR. KUVIN:

25 Q. Who's Ghislaine Maxwell?

Page 31

1 MR. RHEINHART: Same instruction.

2 THE WITNESS: On the instruction of my
 3 lawyer, I must invoke my Fifth Amendment right.

4 BY MR. KUVIN:

5 Q. Who is Dana Burns?

6 MR. RHEINHART: Same instruction.

7 THE WITNESS: On the advice of my lawyer,
 8 I must invoke my Fifth Amendment right.

9 BY MR. KUVIN:

10 Q. Who is Mark Zeff?

11 MR. RHEINHART: Same instruction.

12 THE WITNESS: On the advice of my lawyer,
 13 I must invoke my Fifth Amendment right.

14 BY MR. KUVIN:

15 Q. Who is David Mullen?

16 MR. RHEINHART: Same instruction.

17 THE WITNESS: On the advice of my lawyer,
 18 I must invoke my Fifth Amendment right.

19 BY MR. KUVIN:

20 Q. Who is Todd Meister?

21 MR. RHEINHART: Same instruction.

22 THE WITNESS: On the advice of my lawyer,
 23 I must invoke my Fifth Amendment right.

24 BY MR. KUVIN:

25 Q. Who is Jean-Luc Brunel?

Page 32

1 MR. RHEINHART: Same instruction.

2 THE WITNESS: On the advice of my lawyer,
 3 I must invoke my Fifth Amendment right.

4 BY MR. KUVIN:

5 Q. Ma'am, would you agree with me that all of
 6 the names I just recently mentioned where you
 7 invoked your Fifth Amendment, were involved in a
 8 conspiracy to abuse underaged girls, girls under the
 9 age of 18 for sexual gain and pleasure?

10 MR. RHEINHART: Object to the form of the
 11 question. It calls for a legal conclusion. It
 12 is compound. It calls for her to speculate.
 13 There is no basis for her to be able to give a
 14 legal opinion as to what a conspiracy is, and I
 15 instruct her not to answer based on her Fifth
 16 Amendment privilege.

17 THE WITNESS: On the advice of my lawyer,
 18 I must invoke my Fifth Amendment right.

19 BY MR. KUVIN:

20 Q. Would you agree with me that all of the
 21 names I just mentioned were individuals that were
 22 working together for their own sexual gain and
 23 pleasure?

24 MR. RHEINHART: Object to the form of the
 25 question as ambiguous and compound. I instruct

Page 33	Page 35
1 her not to answer based on her Fifth Amendment 2 privilege. 3 THE WITNESS: On the advice of my lawyer I 4 must invoke my Fifth Amendment privilege. 5 BY MR. KUVIN: 6 Q. What is MC Squared? 7 MR. RHEINHART: I instruct the witness not 8 to answer based on her Fifth Amendment 9 privilege. 10 THE WITNESS: On the advice of my lawyer I 11 must invoke my Fifth Amendment right. 12 BY MR. KUVIN: 13 Q. Would you agree with me that MC Squared is 14 a modeling agency that was funded by 15 Jeffrey Epstein? 16 MR. RHEINHART: I instruct the witness not 17 to answer based on her Fifth Amendment 18 privilege. 19 THE WITNESS: The advice of my lawyer I 20 must invoke my Fifth Amendment right. 21 BY MR. KUVIN: 22 Q. Would you agree with me that MC Squared 23 was wholly funded by Jeffrey Epstein? 24 MR. RHEINHART: Object to the form of the 25 question as to what "wholly funded" means, and	1 BY MR. KUVIN: 2 Q. Would you agree with me that Jeffrey 3 Epstein worked closely with Jean-Luc Brunel in order 4 to obtain girls from out of state and bring them to 5 Florida for their own sexual pleasure? 6 MR. RHEINHART: Object to the form as 7 ambiguous, whose own sexual pleasure, and 8 instruct the witness not to answer the question 9 based on her Fifth Amendment privilege. 10 MR. KUVIN: Perfectly good objection. She 11 doesn't have to answer the question. Let me 12 clarify. 13 BY MR. KUVIN: 14 Q. Would you agree with me, ma'am, that both 15 Jean-Luc Brunel and Jeffrey Epstein worked together 16 to obtain underage girls from out of state and bring 17 them to Florida for both of their own sexual 18 pleasure? 19 MR. RHEINHART: I'm going to object as 20 compound and instruct -- I object to the form 21 as compound, and instruct the witness not to 22 answer based on her Fifth Amendment privilege. 23 THE WITNESS: On the instruction of my 24 lawyer I must invoke my Fifth Amendment right. 25

Page 34	Page 36
1 I would instruct the witness not to answer the 2 question based on her Fifth Amendment 3 privilege. 4 THE WITNESS: On the advice of my lawyer I 5 must invoke my Fifth Amendment right. 6 BY MR. KUVIN: 7 Q. Would you agree with me that 8 Jeffrey Epstein is the sole individual whose money 9 was used to start the company, MC Squared? 10 MR. RHEINHART: Instruct the witness not 11 to answer the question based on her Fifth 12 Amendment privilege. 13 THE WITNESS: On the advice of my lawyer I 14 must invoke my Fifth Amendment right. 15 BY MR. KUVIN: 16 Q. Would you agree with me that 17 Jean-Luc Brunel worked with Jeffrey Epstein to 18 obtain underage girls for both of their sexual 19 pleasure? 20 MR. RHEINHART: Object to the form of the 21 question as ambiguous and instruct the witness 22 not to answer based on her Fifth Amendment 23 privilege. 24 THE WITNESS: On the advice of my lawyer I 25 must invoke my Fifth Amendment right.	1 BY MR. KUVIN: 2 A. Would you agree with me that 3 Ghislaine Maxwell, Jean-Luc Brunel, and Jeffrey Epstein 4 worked together to obtain underage girls from out of 5 state and bring them into the State of Florida for their 6 own sexual pleasure? 7 MR. RHEINHART: Object to the form of the 8 question as compound and ambiguous, and 9 instruct the witness not to answer based on her 10 Fifth Amendment privilege. 11 THE WITNESS: On the instruction of my 12 lawyer, I must invoke my Fifth Amendment right. 13 (Katherine Ezell and Amy Ederi 14 entered the deposition.) 15 MR. GOLDBERGER: That's why we're -- 16 MR. KUVIN: That's why we lost them. 17 MR. RHEINHART: Do you want to take a 18 one-minute break so we can -- 19 MR. KUVIN: Yeah, let's take a quick 20 one-minute break. 21 THE VIDEOGRAPHER: We're now off video 22 record. The time is 10:56 a.m. 23 (A brief recess was held.) 24 (Plaintiff's Exhibit No. 3 was marked for 25 identification.)

<p style="text-align: right;">Page 37</p> <p>1 THE VIDEOGRAPHER: We're now on video 2 record at 11:01 a.m.</p> <p>3 MR. KUVIN: Just for the video record and 4 for the written record Katherine Ezell and Amy 5 Ederi have now appeared and are present in 6 person.</p> <p>7 MR. GOLDBERGER: Just one more matter for 8 the record. Jack Goldberger, on behalf of 9 Jeffrey Epstein. Rather than impose a form 10 objection to every question, I think we have 11 reached an agreement that on behalf of 12 Mr. Epstein, I am adopting the form objections 13 that Mr. Rheinhart is making on behalf of his 14 client nunc pro tunc to the beginning of this 15 deposition.</p> <p>16 MR. KUVIN: No objection.</p> <p>17 MR. GOLDBERGER: Okay.</p> <p>18 BY MR. KUVIN:</p> <p>19 Q. All right. All right. Ms. Kellen, would 20 you agree with me that there was an agreement 21 between Jeffrey Epstein, Ghislaine Maxwell, 22 Jean-Luc Brunel, yourself and Nadia Marcinkova to 23 bring in girls from out of state that were underage?</p> <p>24 MR. RHEINHART: Object to the form of the 25 question as leading, as compound, and instruct</p>	<p>1 personal knowledge and instruct her not to 2 answer based on her Fifth Amendment privilege. 3 It's also compound.</p> <p>4 THE WITNESS: On the instruction of my 5 lawyer I must invoke my Fifth Amendment 6 privilege.</p> <p>7 BY MR. KUVIN:</p> <p>8 Q. The witness says that you may not have 9 knowledge or we don't know whether you have 10 knowledge regarding this passenger manifest, so let 11 me ask you, do you have any knowledge about this 12 passenger manifest?</p> <p>13 MR. RHEINHART: Object to the form of the 14 question as ambiguous as to this and what a 15 manifest is, and also her knowledge, and I will 16 instruct her not to answer based on her Fifth 17 Amendment privilege.</p> <p>18 THE WITNESS: On the instruction of my 19 lawyer, I must invoke my Fifth Amendment 20 privilege.</p> <p>21 BY MR. KUVIN:</p> <p>22 Q. Based on the objection, do you know what a 23 manifest is?</p> <p>24 MR. RHEINHART: Object to the form of the 25 question as ambiguous and instruct her not to</p>
<p style="text-align: right;">Page 38</p> <p>1 the witness not to answer based on her Fifth 2 Amendment privilege.</p> <p>3 THE WITNESS: On the instruction of my 4 lawyer I must invoke my Fifth Amendment right.</p> <p>5 BY MR. KUVIN:</p> <p>6 Q. Would you agree with me that there was an 7 agreement between Jeffrey Epstein, 8 Ghislaine Maxwell, Jean-Luc Brunel, yourself and 9 Nadia Marcinkova to bring in girls that were 10 underage from out of state for sexual contact?</p> <p>11 MR. RHEINHART: Object to the form of the 12 question as leading and compound, and I 13 instruct the witness not to answer based on her 14 Fifth Amendment privilege.</p> <p>15 THE WITNESS: On the instruction of my 16 lawyer I must invoke my Fifth Amendment 17 privilege.</p> <p>18 BY MR. KUVIN:</p> <p>19 Q. All right. Let me show you what we've 20 premarked as Plaintiff's Exhibit 3. Do you 21 recognize this as the passenger manifest for one of 22 Jeffrey Epstein's planes?</p> <p>23 MR. RHEINHART: I object to the form of 24 the question. It assumes facts that this 25 witness, evidence that this witness has no</p>	<p style="text-align: right;">Page 40</p> <p>1 answer based on her Fifth Amendment privilege.</p> <p>2 THE WITNESS: On the instruction of my 3 lawyer I must invoke my Fifth Amendment right.</p> <p>4 BY MR. KUVIN:</p> <p>5 Q. Have you heard the word "manifest" before?</p> <p>6 MR. RHEINHART: I'll instruct the witness 7 not to answer based on her Fifth Amendment 8 privilege.</p> <p>9 THE WITNESS: On the instruction of my 10 lawyer I must invoke my Fifth Amendment right.</p> <p>11 BY MR. KUVIN:</p> <p>12 Q. Would you agree with me, ma'am, that you 13 have seen this passenger manifest, listed as 14 Exhibit 3, in the past?</p> <p>15 MR. RHEINHART: I'll instruct the witness 16 not to answer based on her Fifth Amendment 17 privilege.</p> <p>18 THE WITNESS: On the instruction of my 19 lawyer I must invoke my Fifth Amendment right.</p> <p>20 BY MR. KUVIN:</p> <p>21 Q. Who is Zinta Broukis?</p> <p>22 MR. RHEINHART: I'll instruct the witness 23 not to answer based on her Fifth Amendment 24 privilege.</p> <p>25 THE WITNESS: On the instruction of my</p>

<p style="text-align: right;">Page 41</p> <p>1 lawyer I must invoke my Fifth Amendment 2 privilege.</p> <p>3 MR. KUVIN: Spelling for the court 4 reporter is Z-i-n-t-a, B-r-o-u-k-i-s.</p> <p>5 BY MR. KUVIN:</p> <p>6 Q. Who is Eva Andersson, with two S's?</p> <p>7 MR. RHEINHART: I'll instruct the witness 8 not to answer based on her Fifth Amendment 9 privilege.</p> <p>10 THE WITNESS: On the instruction of my 11 lawyer, I must invoke my Fifth Amendment right.</p> <p>12 BY MR. KUVIN:</p> <p>13 Q. Who is Sevina Dubin (phonetic)?</p> <p>14 MR. RHEINHART: Same instruction.</p> <p>15 THE WITNESS: On the instruction of my 16 lawyer, I must invoke my Fifth Amendment right.</p> <p>17 BY MR. KUVIN:</p> <p>18 Q. Who is Mya Dubin (phonetic)?</p> <p>19 MR. RHEINHART: Same instruction.</p> <p>20 THE WITNESS: On the instruction of my 21 lawyer I must invoke my Fifth Amendment right.</p> <p>22 BY MR. KUVIN:</p> <p>23 Q. Who is Chris Valdez (phonetic)?</p> <p>24 MR. RHEINHART: Same instruction.</p> <p>25 THE WITNESS: On the instruction of my</p>	<p style="text-align: right;">Page 43</p> <p>1 listed in the passenger list to the left?</p> <p>2 MR. RHEINHART: Object to the form, the 3 question is leading and instruct the witness 4 not to answer based on the Fifth Amendment 5 privilege.</p> <p>6 THE WITNESS: On the instruction of my 7 lawyer, I must invoke my Fifth Amendment right.</p> <p>8 BY MR. KUVIN:</p> <p>9 Q. Would you agree with me that you were on a 10 plane with Jeffrey Epstein on April 27, 2005?</p> <p>11 MR. RHEINHART: Same instruction.</p> <p>12 THE WITNESS: On the instruction of my 13 lawyer, I must invoke my Fifth Amendment right.</p> <p>14 BY MR. KUVIN:</p> <p>15 Q. Would you agree with me that on that plane 16 of April 27, 2005, from Teterboro, New Jersey, to 17 West Palm Beach, was a female who was under the age 18 of 16?</p> <p>19 MR. RHEINHART: Object to the form. It 20 assumes facts not established. Any personal 21 knowledge by this witness, and instruct her not 22 to answer based on her Fifth Amendment 23 privilege. It also calls for speculation.</p> <p>24 THE WITNESS: On the instruction of my 25 lawyer, I must invoke my Fifth Amendment</p>
<p style="text-align: right;">Page 42</p> <p>1 lawyer I must invoke my Fifth Amendment right.</p> <p>2 BY MR. KUVIN:</p> <p>3 Q. Who is James Stanley?</p> <p>4 MR. RHEINHART: Same instruction.</p> <p>5 THE WITNESS: On the instruction of my 6 lawyer, I must invoke my Fifth Amendment right.</p> <p>7 BY MR. KUVIN:</p> <p>8 Q. Who is Sophia Stanley?</p> <p>9 MR. RHEINHART: Same instruction.</p> <p>10 THE WITNESS: On the instruction of my 11 lawyer I must invoke my Fifth Amendment right.</p> <p>12 BY MR. KUVIN:</p> <p>13 Q. Who is Alexis Stanley?</p> <p>14 MR. RHEINHART: Same instruction.</p> <p>15 THE WITNESS: On the instruction of my 16 lawyer, I must invoke my Fifth Amendment right.</p> <p>17 BY MR. KUVIN:</p> <p>18 Q. Ma'am, if you would, in Exhibit 3, would 19 you turn to the date of April 27, 2005, for me? 20 It's about halfway through the packet. April 27, 21 '05. Are you there?</p> <p>22 A. Uh-huh.</p> <p>23 Q. Okay. On this particular date, will you 24 agree with me that you flew from Teterboro, 25 New Jersey to West Palm Beach on a plane with people</p>	<p style="text-align: right;">Page 44</p> <p>1 privilege.</p> <p>2 BY MR. KUVIN:</p> <p>3 Q. Would you agree with me that on the flight 4 of April 27, 2005, from Teterboro, New Jersey to 5 West Palm Beach was a female on the plane with you 6 that was under the age of 15?</p> <p>7 MR. RHEINHART: Object to the form of the 8 question. It requires speculation. It assumes 9 facts not established before this witness. 10 I'll instruct her not to answer based on her 11 Fifth Amendment privilege. It's also 12 ambiguous.</p> <p>13 THE WITNESS: On the instruction of my 14 lawyer, I must invoke my Fifth Amendment 15 privilege.</p> <p>16 BY MR. KUVIN:</p> <p>17 Q. Will you turn to May 6, 2005, please. And 18 this is, for the record, in Exhibit 3. On May 6th, 19 2005, ma'am, will you agree with me that you took a 20 flight from Teterboro, New Jersey to West Palm 21 Beach, with Jeffrey Epstein, Nadia Marcinkova, 22 Andriana, Andrea Musinska, David Mullen, Larry 23 Morrison and another female?</p> <p>24 MR. RHEINHART: Object to the form of the 25 question as compound, calling for speculation.</p>

1 I instruct the witness not to answer based on
 2 her Fifth Amendment privilege.

3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment
 5 privilege.

6 BY MR. KUVIN:

7 Q. Would you agree with me, ma'am, that on
 8 the flight of May 6th, 2005, that's shown in
 9 Exhibit 3, that the female identified in the
 10 passenger manifest was under the age of 16?

11 MR. RHEINHART: Object to the form. It
 12 assumes facts not established that this witness
 13 has any personal knowledge. It calls for her
 14 to speculate, and I'll instruct her not to
 15 answer based on her Fifth Amendment privilege.

16 THE WITNESS: On the instruction of my
 17 lawyer, I must invoke my Fifth Amendment
 18 privilege.

19 BY MR. KUVIN:

20 Q. Would you agree with me that the female
 21 identified in the passenger manifest of May 6th,
 22 2005, was under the age of 15?

23 MR. RHEINHART: Same objection as the
 24 previous question, same instruction.

25 THE WITNESS: On the instruction of my

1 BY MR. KUVIN:

2 Q. Do you also agree with me on that flight
 3 of June 20th, 2005, was an unidentified female,
 4 according to the passenger manifest?

5 MR. RHEINHART: Object to the form --
 6 excuse me -- as leading, and instruct the
 7 witness not to answer based on her Fifth
 8 Amendment privilege.

9 THE WITNESS: On the instruction of my
 10 lawyer, I must choose to invoke my Fifth
 11 Amendment privilege.

12 BY MR. KUVIN:

13 Q. Would you agree with me that that female
 14 listed on the flight of June 20, 2005, was under the
 15 age of 16 years old?

16 MR. RHEINHART: Objection to the form as
 17 leading and also requiring speculation. I'll
 18 instruct the witness not to answer based on her
 19 Fifth Amendment privilege.

20 THE WITNESS: On the instruction of my
 21 lawyer, I must choose to invoke my Fifth
 22 Amendment privilege.

23 BY MR. KUVIN:

24 Q. Would you agree with me that the
 25 unidentified female on the passenger manifest of

1 lawyer I must invoke my Fifth Amendment
 2 privilege.

3 BY MR. KUVIN:

4 Q. Would you agree with me that the female
 5 listed in the passenger manifest of May 6th, 2005,
 6 was under the age, was under the age of 14?

7 MR. RHEINHART: Same instruction as to the
 8 previous two questions and the same objection
 9 as to those two questions.

10 THE WITNESS: On the instruction of my
 11 lawyer I must invoke my Fifth Amendment
 12 privilege.

13 BY MR. KUVIN:

14 Q. If you would turn to the date of June 20
 15 of 2005 for me, please. On the date of June 20,
 16 2005, would you agree with me that you took a flight
 17 with Jeffrey Epstein from West Palm Beach to
 18 Teterboro, New Jersey?

19 MR. RHEINHART: Object to the form as
 20 leading. I'll instruct the witness not to
 21 answer based on her Fifth Amendment privilege.

22 THE WITNESS: On the instruction of my
 23 lawyer, I must invoke my Fifth Amendment
 24 privilege.

1 June 20, 2005, was under the age of 14?

2 MR. RHEINHART: Objection, calls for
 3 speculation, instruct the witness not to answer
 4 based on her Fifth Amendment privilege.

5 THE WITNESS: On the instruction of my
 6 lawyer, I must invoke my Fifth Amendment
 7 privilege.

8 BY MR. KUVIN:

9 Q. Turn to the date of June 30, if you would,
 10 2005. Would you agree with me that you took a
 11 flight from Teterboro, New Jersey, to West Palm
 12 Beach on June 30, 2005, with Jeffrey Epstein?

13 MR. RHEINHART: Object to the form as
 14 leading and compound, instruct the witness not
 15 to answer based on her Fifth Amendment
 16 privilege.

17 THE WITNESS: On the instruction of my
 18 lawyer I must, I must invoke my Fifth Amendment
 19 right.

20 BY MR. KUVIN:

21 Q. Would you agree with me that Dana Burns
 22 was on that flight?

23 MR. RHEINHART: Same instruction.

24 THE WITNESS: On the instruction of my
 25 lawyer I must invoke my Fifth Amendment

Page 49

Page 51

1 privilege.

2 BY MR. KUVIN:

3 Q. Would you agree with me that there was
4 also another female on that flight with you?

5 MR. RHEINHART: Same instruction.

6 THE WITNESS: On the instruction of my
7 lawyer, I must invoke my Fifth Amendment
8 privilege.

9 BY MR. KUVIN:

10 Q. Would you agree with me that you had
11 personal knowledge that that young female on that
12 flight with you of June 30, 2005, was under the age
13 of 16?14 MR. RHEINHART: Object to the form as
15 compound and calling for speculation, and
16 instruct the witness not to answer based on her
17 Fifth Amendment privilege.18 THE WITNESS: On the instruction of my
19 lawyer, I must invoke my Fifth Amendment
20 privilege.

21 BY MR. KUVIN:

22 Q. Would you agree with me that you had
23 personal knowledge that that young female on the
24 flight of June 30, 2005, was under the age of 15?

25 MR. RHEINHART: Same instruction, calls

Page 50

Page 52

1 for speculation.

2 THE WITNESS: On the instruction of my
3 lawyer, I must invoke my Fifth Amendment
4 privilege.

5 BY MR. KUVIN:

6 Q. Would you agree with me that you had
7 personal knowledge that that young female on the
8 flight of June 30, 2005, with you was under the age
9 of 14?10 MR. RHEINHART: Objection to form as to
11 compound and requiring speculation. I'll
12 instruct the witness not to answer based on her
13 Fifth Amendment privilege.14 THE WITNESS: On the instruction of my
15 lawyer I must invoke my Fifth Amendment
16 privilege.

17 BY MR. KUVIN:

18 Q. Ma'am, just so we can be quicker about
19 this, there are flights of July 5th, July 15. It
20 looks like those are the last two. Would you agree
21 with me that on July 5th and July 15, you took
22 flights on Jeffrey Epstein's plane?23 MR. RHEINHART: Object to the form as
24 compound and instruct the witness not to answer
25 based on Fifth Amendment privilege.1 THE WITNESS: On the instruction of my
2 lawyer I must invoke my Fifth Amendment
3 privilege.

4 BY MR. KUVIN:

5 Q. Would you agree with me that on both of
6 those flights were girls that were under the age of
7 16?8 MR. RHEINHART: Same form objection as to
9 compound, also ambiguous and requiring
10 speculation and instruct the witness not to
11 answer based on her Fifth Amendment privilege.12 THE WITNESS: The instruction of my lawyer
13 I must invoke my Fifth Amendment privilege.

14 BY MR. KUVIN:

15 Q. Would you agree with me, ma'am, that you
16 have flown on Jeffrey Epstein's plane from
17 Teterboro, New Jersey, to West Palm Beach, on
18 numerous occasions where there were girls on the
19 plane under the age of 16?20 MR. RHEINHART: Object to the form as
21 compound and ambiguous as to what numerous
22 means. Instruct the witness not to answer
23 based on her Fifth Amendment privilege.24 THE WITNESS: On the instruction of my
25 lawyer I must invoke my Fifth Amendment

1 privilege.

2 BY MR. KUVIN:

3 Q. Would you agree with me that you have
4 flown on Jeffrey Epstein's plane from Teterboro, New
5 Jersey, to West Palm Beach on at least 100 occasions
6 where there were girls on the plane with you under
7 the age of 16?8 MR. RHEINHART: Object to the form as
9 compound, requiring speculation and ambiguous,
10 and instruct her not to answer based on her
11 Fifth Amendment privilege.12 THE WITNESS: On the instruction of my
13 lawyer I must invoke my Fifth Amendment
14 privilege.

15 BY MR. KUVIN:

16 Q. Would you agree with me, ma'am, that you
17 have flown on Jeffrey Epstein's plane at least 100
18 times from Teterboro, New Jersey to West Palm Beach,
19 Florida, where there were girls under the age of 15
20 on the plane with you?21 MR. RHEINHART: Same objections as the
22 previous question, same instruction.23 THE WITNESS: On the instruction of my
24 lawyer, I must invoke my Fifth Amendment
25 privilege.

1 BY MR. KUVIN:

2 Q. Would you agree with me that you have
3 flown on Jeffrey Epstein's plane from Teterboro, New
4 Jersey to West Palm Beach on at least 100 occasions
5 where there were girls on the plane with you that
6 were under the age of 14?

7 MR. RHEINHART: Objection to the form.

8 It's compound and ambiguous, calls for
9 speculation and instruct her not to answer
10 based on her Fifth Amendment privilege.

11 THE WITNESS: On the instruction of my
12 lawyer, I must invoke my Fifth Amendment
13 privilege.

14 BY MR. KUVIN:

15 Q. Would you agree with me that you have been
16 on the plane, one of Jeffrey Epstein's -- strike
17 that.

18 Would you agree with me that you have
19 been on Jeffrey Epstein's plane with him to Paris
20 where there have been girls on the plane with you
21 under the age of 16?

22 MR. RHEINHART: Objection to the form as
23 compound, assuming facts not established the
24 witness has any knowledge, and instruct the
25 witness not to answer based on her Fifth

1 occasions where Jeffrey Epstein was flying with
2 young girls under the age of 16 from Teterboro, New
3 Jersey, to Florida, West Palm Beach, Florida, with
4 girls under the age of 16, was doing so, so that he
5 could have sexual contact with them?

6 MR. RHEINHART: Object to the form. It's
7 compound and requires her to assume facts that
8 have not been established, and it's ambiguous,
9 and instruct her not to answer based on the
10 Fifth Amendment privilege.

11 THE WITNESS: On the instruction of my
12 lawyer, I must assert my Fifth Amendment right.

13 BY MR. KUVIN:

14 Q. Do you agree with me that on the flights
15 from West Palm Beach to Paris, where you were
16 present on the plane with Jeffrey Epstein, that
17 there were girls under the age of 16 that
18 Jeffrey Epstein was having sexual contact with on
19 that plane?

20 MR. RHEINHART: Same objections as
21 previously stated. It's compound, ambiguous,
22 and assumes facts that she has no knowledge, or
23 it has not been established that she has any
24 knowledge of, and instruct her not to answer
25 based on the Fifth Amendment, and it's leading.

1 Amendment privilege. It's also leading.

2 THE WITNESS: On the instruction of my
3 lawyer, I must invoke my Fifth Amendment
4 privilege.

5 BY MR. KUVIN:

6 Q. Would you agree with me that you have been
7 on the plane with Jeffrey Epstein on flights to
8 Paris where there have been girls on the plane with
9 you under the age of 15?

10 MR. RHEINHART: Same objection and same
11 instruction as the previous question.

12 THE WITNESS: On the instruction of my
13 lawyer, I must invoke my Fifth Amendment
14 privilege.

15 BY MR. KUVIN:

16 Q. Would you agree with me that you have been
17 on those same flights we have been discussing where
18 there have been girls under the age of 14?

19 MR. RHEINHART: Same instruction and same
20 objection as the previous two questions.

21 THE WITNESS: On the instruction of my
22 lawyer, I must invoke my Fifth Amendment
23 privilege.

24 BY MR. KUVIN:

25 Q. Would you agree with me that on the

1 THE WITNESS: On the instruction of my
2 lawyer I must invoke my Fifth Amendment right.

3 BY MR. KUVIN:

4 Q. Ma'am, you've been on the plane, you've
5 been on a plane with Jeffrey Epstein in the past,
6 have you not?

7 MR. RHEINHART: Objection to the form as
8 leading, and instruct her not to answer based
9 on the Fifth Amendment privilege.

10 THE WITNESS: On the instruction of my
11 lawyer, I must invoke my Fifth Amendment
12 privilege.

13 BY MR. KUVIN:

14 Q. Have you been on a plane with
15 Jeffrey Epstein ever in your entire life?

16 MR. RHEINHART: Instruct the witness not
17 to answer based on her Fifth Amendment right.

18 THE WITNESS: On the instruction of my
19 lawyer I must invoke my Fifth Amendment
20 privilege.

21 BY MR. KUVIN:

22 Q. Have you ever been on a plane with
23 Jeffrey Epstein where there was a girl on the plane
24 with you under the age of 14?

25 MR. RHEINHART: Same instruction.

1 THE WITNESS: On the instruction of my
 2 lawyer, I must invoke my Fifth Amendment
 3 privilege.

4 BY MR. KUVIN:

5 Q. Ma'am, isn't it true that you've seen
 6 Jeffrey Epstein have sex with girls under the age of
 7 14 on his plane?

8 MR. RHEINHART: Objection to the form. It
 9 assumes facts that it's not been established
 10 that she would have any knowledge of, and I'll
 11 instruct her not to answer based on her Fifth
 12 Amendment right.

13 THE WITNESS: On the instruction of my
 14 lawyer, I must invoke my Fifth Amendment
 15 privilege.

16 BY MR. KUVIN:

17 Q. Would you agree with me that you've seen
 18 Jeffrey Epstein have sex with girls on his plane in
 19 your presence during flights to Paris?

20 MR. RHEINHART: Same objection previously
 21 stated, and it assumes facts that have not been
 22 established and instruct her not to answer
 23 based on her Fifth Amendment right.

24 THE WITNESS: On the instruction of my
 25 lawyer, I must invoke my Fifth Amendment

1 MR. RHEINHART: Same objection as stated
 2 to the previous question; it's ambiguous and
 3 instruct her not to answer based on the Fifth
 4 Amendment.

5 THE WITNESS: On the instruction of my
 6 lawyer, I must invoke my Fifth Amendment right.

7 MR. KUVIN: Just to clarify, is the
 8 ambiguity the word "sex"?

9 MR. RHEINHART: Sex and also assumes that
 10 she's ever met Jeffrey Epstein in her life.

11 MR. KUVIN: Any other words in there I
 12 need to clarify?

13 MR. RHEINHART: No.

14 BY MR. KUVIN:

15 Q. Okay. Ma'am, do you -- what's your
 16 definition of the word "sex"?

17 MR. RHEINHART: Object to the form of the
 18 question and instruct the witness not to answer
 19 based on her Fifth Amendment privilege.

20 THE WITNESS: On the instruction of my
 21 lawyer, I must invoke my Fifth Amendment right.

22 BY MR. KUVIN:

23 Q. Would you agree with me that the word
 24 "sex" means both vaginal intercourse as well as oral
 25 sex? Would you agree with that definition?

1 privilege.

2 BY MR. KUVIN:

3 Q. Ma'am, isn't it true that you've seen
 4 Jeffrey Epstein and Jean-Luc Brunel have sex with
 5 girls under the age of 14 on Mr. Epstein's plane on
 6 flights to Paris?

7 MR. RHEINHART: Objection to the form.
 8 It's compound, as to several answers all at the
 9 same time and certain facts, and instruct her
 10 not to answer based on her Fifth Amendment.

11 THE WITNESS: On the instruction of my
 12 lawyer, I must invoke my Fifth Amendment
 13 privilege.

14 BY MR. KUVIN:

15 Q. Ma'am, isn't it true that you have had sex
 16 with Jeffrey Epstein on his plane?

17 MR. RHEINHART: Instruct the witness not
 18 to answer based on the Fifth Amendment
 19 privilege, also object to the form of the
 20 question as compound and ambiguous.

21 THE WITNESS: On the instruction of my
 22 lawyer, I must invoke my Fifth Amendment right.

23 BY MR. KUVIN:

24 Q. Isn't it true that you've had sex with
 25 Jeffrey Epstein on his plane on flights to Paris?

1 MR. RHEINHART: You can answer that.

2 THE WITNESS: No.

3 BY MR. KUVIN:

4 Q. Okay. Would you agree with me that sex,
 5 for the purpose of our questions here today, will be
 6 limited strictly to vaginal intercourse?

7 A. Sorry. Can you repeat that?

8 Q. Yes. For the purpose of my questions here
 9 today, will you agree that the word "sex" will be
 10 limited to vaginal intercourse between a man's penis
 11 and a woman's vagina?

12 MR. RHEINHART: If you're instructing her
 13 that in the future she should assume that
 14 that's what you mean by your question, that's
 15 fine.

16 MR. KUVIN: Okay.

17 MR. RHEINHART: If that's what you mean,
 18 then that's understood.

19 MR. KUVIN: That's what I mean.

20 MR. RHEINHART: Okay.

21 MR. KUVIN: All right. Let's go with that
 22 definition. And for the purposes of my
 23 questions, "oral sex" will mean contact between
 24 an individual's mouth and a man's sexual organ,
 25 penis. Fair enough?

Page 61		Page 63	
1	MR. RHEINHART: Understood.	1	Mr. Epstein's residence, as to her knowledge of
2	MR. KUVIN: Okay.	2	Mr. Epstein and other facts as to which she's
3	BY MR. KUVIN:	3	invoking her Fifth Amendment privilege.
4	Q. Working with those definitions if we	4	THE WITNESS: On the instruction of my
5	could, would you agree with me that you had sex with	5	lawyer, I must to invoke my Fifth Amendment
6	Jeffrey Epstein on his plane?	6	privilege.
7	MR. RHEINHART: Objection to the form.	7	MR. KUVIN: Let me show you what we'll
8	It's compound and instruct her not to answer	8	mark as Exhibit 6. And this one I'm going to
9	based on the Fifth Amendment privilege, because	9	show it to the camera real briefly, if I could.
10	to do so would implicitly admit that she's ever	10	Okay.
11	met Jeffrey Epstein in her life, and so as to	11	MR. RHEINHART: Let me see it. Thank you.
12	that she's invoking the Fifth Amendment	12	(Plaintiff's Exhibit No. 6 was marked for
13	privilege.	13	identification.)
14	THE WITNESS: On the instruction of my	14	BY MR. KUVIN:
15	lawyer, I must invoke my Fifth Amendment	15	Q. Ma'am, do you recognize any of the girls
16	privilege.	16	shown in Exhibit 6?
17	BY MR. KUVIN:	17	MR. RHEINHART: I'll instruct the witness
18	Q. Would you agree with me that you have had	18	not to answer based on her Fifth Amendment
19	oral sex with Jeffrey Epstein on his plane?	19	privilege.
20	MR. RHEINHART: Same objection stated to	20	THE WITNESS: On the instruction of my
21	the previous question. It's compound and it	21	lawyer, I must invoke my Fifth Amendment right.
22	assumes facts that's not been established as to	22	BY MR. KUVIN:
23	which she is invoking her Fifth Amendment	23	Q. Would you agree with me that that is you
24	privilege.	24	on the right in this photograph, the far right?
25	THE WITNESS: On the instruction of my	25	MR. RHEINHART: I'll instruct the witness

Page 62		Page 64	
1	lawyer, I must invoke my Fifth Amendment	1	not to answer.
2	privilege.	2	THE WITNESS: On the instruction of my
3	BY MR. KUVIN:	3	lawyer, I must invoke my Fifth Amendment
4	Q. Would you agree with me that you have had	4	privilege.
5	sex with Jeffrey Epstein in his home --	5	BY MR. KUVIN:
6	MR. RHEINHART: Object to the --	6	Q. Would you agree with me that that is
7	MR. KUVIN: -- here in West Palm, in West	7	Nadia Marcinkova on the left in that photograph that
8	Palm Beach?	8	we marked as Exhibit 6?
9	MR. RHEINHART: I'll instruct the witness	9	MR. RHEINHART: Same instruction.
10	not to answer based on her Fifth Amendment	10	THE WITNESS: On the instruction of my
11	privilege and same objection previously stated	11	lawyer, I must invoke my Fifth Amendment
12	to the last two questions.	12	privilege.
13	THE WITNESS: On the instruction of my	13	BY MR. KUVIN:
14	lawyer, I must invoke my Fifth Amendment	14	Q. How old are you in this photograph?
15	privilege.	15	MR. RHEINHART: Same instruction.
16	BY MR. KUVIN:	16	THE WITNESS: On the instruction of my
17	Q. Would you agree with me that you have had	17	lawyer, I must invoke my Fifth Amendment
18	oral sex with Jeffrey Epstein in his home in West	18	privilege.
19	Palm Beach?	19	BY MR. KUVIN:
20	MR. GARCIA: Is it West, or Palm Beach?	20	Q. How old is Nadia Marcinkova in this
21	MR. KUVIN: Palm Beach Island, I think	21	photograph, if you know?
22	it's, because -- yeah, for clarity, his home on	22	MR. RHEINHART: I'm going to object to the
23	Palm Beach.	23	form in that it assumes facts as to her
24	MR. RHEINHART: Object to the form. It	24	knowledge of anything about Ms. Marcinkova, and
25	assumes facts as to her knowledge of	25	as to which she is invoking her Fifth Amendment

1 privilege.

2 THE WITNESS: On the instruction of my
3 lawyer, I must invoke my Fifth Amendment
4 privilege.

5 MR. KUVIN: This is Exhibit 7. Let me
6 show you what we'll mark as Exhibit 7.

7 (Plaintiff's Exhibit No. 7 was marked for
8 identification.)

9 BY MR. KUVIN:

10 Q. Do you recognize the girl that's shown in
11 Exhibit 7?

12 MR. RHEINHART: I need to consult with her
13 one second.

14 MR. KUVIN: Sure.

15 THE VIDEOGRAPHER: Are we off the record?

16 MR. KUVIN: No, no.

17 MR. RHEINHART: Instruct the witness to
18 invoke her Fifth Amendment privilege as to
19 Exhibit 7.

20 MR. KUVIN: She's clipped up. Okay.

21 MR. RHEINHART: Now you have to answer.

22 THE WITNESS: On the advice of my lawyer,
23 I must invoke my Fifth Amendment privilege.

24 BY MR. KUVIN:

25 Q. Would you agree with me that the girl

1 THE WITNESS: On the instruction of my
2 lawyer, I must invoke my Fifth Amendment
3 privilege.

4 BY MR. KUVIN:

5 Q. Would you agree with me that Haley Robson
6 has been to Mr. Epstein's home on hundreds of
7 occasions?

8 MR. RHEINHART: Object to the form as
9 compound and also assumes knowledge as this
10 witness has and instruct her to invoke her
11 Fifth Amendment privilege relating to
12 Ms. Robson.

13 THE WITNESS: On the instruction of my
14 lawyer, I must invoke my Fifth Amendment
15 privilege.

16 BY MR. KUVIN:

17 Q. Would you agree with me that you directed
18 Haley Robson on hundreds of occasions to bring girls
19 under the age of 16 to Mr. Epstein's house?

20 MR. RHEINHART: Object to the form of the
21 question as compound and ambiguous and assuming
22 facts as to which there is no factual basis
23 that this witness has any knowledge and
24 instruct the witness not to answer based on her
25 Fifth Amendment privilege.

1 shown in Exhibit 7 is Haley Robson?

2 MR. RHEINHART: Instruct the witness not
3 to answer based on the Fifth Amendment
4 privilege.

5 THE WITNESS: On the instruction of my
6 lawyer, I must invoke my Fifth Amendment
7 privilege.

8 BY MR. KUVIN:

9 Q. Do you agree with me that Haley Robson was
10 under the age of 16 when she was first asked to go
11 to Mr. Epstein's home?

12 MR. RHEINHART: Objection to the form. It
13 assumes any knowledge by this witness as to the
14 person you identified as Haley Robson. It's
15 compound and I would instruct her not to answer
16 based on her Fifth Amendment privilege.

17 THE WITNESS: On the instruction of my
18 lawyer, I must invoke my Fifth Amendment
19 privilege.

20 BY MR. KUVIN:

21 Q. Would you agree with me that you know
22 personally Haley Robson?

23 MR. RHEINHART: Instruct the witness not
24 to answer based on the Fifth Amendment
25 privilege.

1 THE WITNESS: On the instruction of my
2 lawyer, I must choose to invoke my Fifth
3 Amendment right.

4 BY MR. KUVIN:

5 Q. Would you agree with me that on hundreds
6 of occasions you directed Haley Robson to bring
7 underage girls under the age of 16 to Mr. Epstein's
8 home for sex with Mr. Epstein?

9 MR. RHEINHART: Object to the form. It's
10 compound and it assumes facts as to this --
11 that this witness has no personal knowledge,
12 and it's been established by this record, and
13 instruct her to invoke her Fifth Amendment
14 privilege.

15 THE WITNESS: On the instruction of my
16 lawyer, I must invoke my Fifth Amendment
17 privilege.

18 MR. KUVIN: We'll mark this as Exhibit 8.
19 (Plaintiff's Exhibit No. 8 was marked for
20 identification.)

21 BY MR. KUVIN:

22 Q. Ma'am, do you recognize the person that's
23 shown in Exhibit 8?

24 MR. RHEINHART: Let me consult one second.

25 MR. KUVIN: Sure.

<p style="text-align: right;">Page 69</p> <p>1 MR. RHEINHART: I instruct the witness not 2 to answer the question based on her Fifth 3 Amendment privilege. 4 THE WITNESS: Based on the instruction of 5 my lawyer, I must invoke my Fifth Amendment 6 right. 7 BY MR. KUVIN: 8 Q. Would you agree with me that the person 9 shown on Exhibit 8 is you? 10 MR. RHEINHART: Same instruction. 11 THE WITNESS: On the instruction of my 12 lawyer, I must invoke my Fifth Amendment 13 privilege. 14 BY MR. KUVIN: 15 Q. Would you agree with me that this is a 16 modeling shot of you that was taken through one of 17 Mr. Epstein's modeling agencies? 18 MR. RHEINHART: Object to the form of the 19 question as compound and assuming facts as to 20 which there has been no basis that this witness 21 has any personal knowledge, and she's going 22 to invoke her Fifth Amendment privilege. 23 THE WITNESS: On the instruction of my 24 lawyer, I must invoke my Fifth Amendment 25 privilege.</p>	<p style="text-align: right;">Page 71</p> <p>1 MR. GARCIA: He didn't make a Fifth 2 Amendment objection. So can we just rephrase 3 the question? 4 MR. RHEINHART: I would instruct the 5 witness not to answer based on the Fifth 6 Amendment privilege to clarify. 7 MR. KUVIN: Okay. Let's mark this as 8 Exhibit 9. 9 MR. RHEINHART: And for the record, the 10 basis is that it assumes her knowledge of 11 anything relating to Jeffrey Epstein, the 12 question assumed that. 13 (Plaintiff's Exhibit No. 9 was marked for 14 identification.) 15 BY MR. KUVIN: 16 Q. Ma'am, do you recognize the girl shown in 17 Exhibit 9? 18 MR. RHEINHART: I'll instruct the witness 19 not to answer based on her Fifth Amendment 20 privilege. 21 THE WITNESS: On the instruction of my 22 lawyer, I must invoke my Fifth Amendment right. 23 BY MR. KUVIN: 24 Q. Would you agree with me that the girl 25 shown in Exhibit 9 is Nadia Marcinkova?</p>
<p style="text-align: right;">Page 70</p> <p>1 BY MR. KUVIN: 2 Q. Would you agree with me that you were 3 under the age of 18 in this photograph we've marked 4 as Exhibit 8? 5 MR. RHEINHART: Same objection as to the 6 previous question and same instruction. 7 THE WITNESS: On the instruction of my 8 lawyer, I must invoke my Fifth Amendment right. 9 BY MR. KUVIN: 10 Q. Would you agree with me that you were 11 under the age of 17 in this photograph that we've 12 marked as Exhibit 8? 13 MR. RHEINHART: Same objection as the 14 previous two question and the same instruction. 15 THE WITNESS: On the instruction of my 16 lawyer, I must invoke my Fifth Amendment right. 17 BY MR. KUVIN: 18 Q. Would you agree with me that Jeffrey 19 Epstein kept this photograph of you in his home, if 20 you know. 21 MR. RHEINHART: Object to the form of the 22 question as compound and ambiguous, and I would 23 instruct the witness not to answer. 24 THE WITNESS: On the instruction of my 25 lawyer, I must invoke my Fifth Amendment right.</p>	<p style="text-align: right;">Page 72</p> <p>1 MR. RHEINHART: Same instruction. 2 THE WITNESS: On the instruction of my 3 lawyer, I must invoke my Fifth Amendment 4 privilege. 5 MR. KUVIN: I forgot to do one more thing. 6 If you could give that back to me for just one 7 second just for the record so we can see what 8 we're talking about here. 9 Okay. I will give you back Exhibit 10 9. 11 MR. RHEINHART: Thank you. 12 BY MR. KUVIN: 13 Q. Would you agree with me that this 14 photograph of Nadia Marcinkova was taken when she 15 was under the age of 18? 16 MR. RHEINHART: Objection to the form. It 17 assumes this witness has any knowledge that the 18 person in the photograph is, in fact, Nadia 19 Marcinkova. Therefore, it's ambiguous and 20 compound, and I'll instruct her not to answer 21 based on her Fifth Amendment privilege. 22 THE WITNESS: On the instruction of my 23 lawyer, I must invoke my Fifth Amendment right. 24 BY MR. KUVIN: 25 Q. Would you agree with me that the girl</p>

1 shown in that photograph -- strike that.

2 Would you agree with me that this
3 photograph was kept by Jeffrey Epstein in his home?

4 MR. RHEINHART: Objection to the form as
5 to being compound in that it assumes that she
6 has any knowledge of Jeffrey Epstein or his
7 home, and I would instruct her not to answer
8 based on her Fifth Amendment.

9 THE WITNESS: On the instruction of my
10 lawyer, I must invoke my Fifth Amendment right.

11 BY MR. KUVIN:

12 Q. Would you agree with me that
13 Nadia Marcinkova was under the age of 16 when this
14 photograph was taken in Exhibit 9?

15 MR. RHEINHART: Objection to the form as
16 compound and also assuming this witness has any
17 knowledge that the person in the photograph is,
18 in fact, Nadia Marcinkova. Therefore, I would
19 instruct her to invoke her Fifth Amendment
20 privilege.

21 THE WITNESS: On the instruction of my
22 lawyer, I must invoke my Fifth Amendment right.

23 BY MR. KUVIN:

24 Q. Ma'am, is Jeffrey Epstein paying for your
25 attorney today?

1 implicitly assumes that she does, I would
2 instruct her not to answer it based on her
3 Fifth Amendment privilege.

4 THE WITNESS: Upon the instruction of my
5 lawyer, I must invoke my Fifth Amendment
6 privilege.

7 BY MR. KUVIN:

8 Q. Ma'am, are you aware of the effect, the
9 emotional effect on the underage girls that have
10 been abused by Jeffrey Epstein? Are you aware of
11 the emotional effect that it's had on the underage
12 girls that have been abused by Jeffrey Epstein?

13 MR. RHEINHART: Objection to the form as
14 to, again, the question assumes this witness
15 has any knowledge, first, of Jeffrey Epstein,
16 second that Jeffrey Epstein has sexually abused
17 anyone ever, and third, that anyone has been
18 damaged by anything that Jeffrey Epstein has
19 done, and fourth, that she would somehow have
20 any knowledge of these people's emotional
21 situations. For all those reasons, the
22 question is ambiguous and compound, and I would
23 instruct her not to answer based on her Fifth
24 Amendment.

25 THE WITNESS: Upon the instruction of my

1 MR. RHEINHART: I'll instruct the witness
2 not to answer based on her Fifth Amendment
3 privilege.

4 THE WITNESS: On the instruction of my
5 lawyer, I must invoke my Fifth Amendment right.

6 BY MR. KUVIN:

7 Q. Ma'am, is Jeffrey Epstein paying for you
8 to keep quiet with respect to the things he has done
9 to underage girls?

10 MR. RHEINHART: Objection to the form in
11 that it's ambiguous and compound, also assumes
12 this witness has any knowledge at all of
13 Jeffrey Epstein, and therefore I am instructing
14 her to invoke her Fifth Amendment privilege.

15 THE WITNESS: On the instruction of my
16 lawyer, I must invoke my Fifth Amendment
17 privilege.

18 BY MR. KUVIN:

19 Q. Ma'am, how much is Jeffrey Epstein paying
20 you to keep quiet with respect to things he's done
21 to underage girls?

22 MR. RHEINHART: Object to the form as
23 multiple compound questions, and it's again
24 assuming this witness has any knowledge at all
25 of Jeffrey Epstein. Since the question

1 lawyer, I must invoke my Fifth Amendment right.
2 BY MR. KUVIN:

3 Q. Ma'am, do you have any regret for what
4 you've done?

5 MR. RHEINHART: Objection to the form.
6 That question is not designed to lead to
7 discoverable evidence. It's meant solely for
8 the purpose of harassment, and I would instruct
9 her not to answer.

10 BY MR. KUVIN:

11 Q. Ma'am, do you have any regrets for what
12 Jeffrey Epstein has done through you in obtaining
13 underage girls for sexual abuse?

14 MR. RHEINHART: Same objection as the
15 previous question as well as that question is
16 now free to assume this witness has any
17 knowledge at all of Jeffrey Epstein or
18 Jeffrey Epstein having abused any underage
19 women or girls or anything else that
20 Jeffrey Epstein may ever have done.

21 And therefore, since it assumes that
22 fact, I would instruct her not to answer
23 based on her Fifth Amendment.

24 BY MR. KUVIN:

25 Q. Are you scared of Jeffrey Epstein?

1 MR. KUVIN: I'm sorry, you had to respond.
 2 I cut you off.

3 THE WITNESS: Upon the instruction of my
 4 lawyer, I must invoke my Fifth Amendment right.

5 BY MR. KUVIN:

6 Q. Are you scared of Jeffrey Epstein?

7 MR. RHEINHART: Objection to the form in
 8 that it assumes this witness has ever met
 9 Jeffrey Epstein in her life. Because it
 10 assumes that, I would instruct her not to
 11 answer based on the Fifth Amendment.

12 THE WITNESS: On the instruction of my
 13 lawyer, I must invoke my Fifth Amendment right.

14 BY MR. KUVIN:

15 Q. Are you aware of Jeffrey Epstein's sexual
 16 obsession for children?

17 MR. RHEINHART: Same instructions as the
 18 previous question, also objection to the
 19 question. It's not designed to lead to any
 20 discoverable evidence at all. It's simply
 21 meant for harassment.

22 THE WITNESS: On the instruction of my
 23 lawyer, I must invoke my Fifth Amendment
 24 privilege.

25

1 lawyer, and I must invoke my Fifth Amendment
 2 privilege.

3 BY MR. KUVIN:

4 Q. Do you know who Les Wexner is?

5 MR. RHEINHART: I'll instruct the witness
 6 not to answer based on her Fifth Amendment
 7 privilege.

8 THE WITNESS: On the instruction of my
 9 lawyer, I must invoke my Fifth Amendment
 10 privilege.

11 BY MR. KUVIN:

12 Q. Do you know whether or not Mr. Epstein has
 13 had a homosexual relationship with Les Wexner in the
 14 past?

15 MR. RHEINHART: Objection to the form in
 16 that it again assumes that this witness knows
 17 anything at all about Jeffrey Epstein or has
 18 ever met Jeffrey Epstein in her life, and
 19 therefore, I would instruct her not to answer
 20 based on her Fifth Amendment privilege, and the
 21 question is compound and ambiguous.

22 THE WITNESS: On the instruction of my
 23 lawyer, I must invoke my Fifth Amendment
 24 privilege.

25

1 BY MR. KUVIN:

2 Q. At what point did you realize that
 3 Jeffrey Epstein was sexually attracted to girls
 4 under the age of 18?

5 MR. RHEINHART: Once again, the question
 6 assumes this witness knows anything at all
 7 about Jeffrey Epstein, underage women, sexual
 8 abuse of underage women, and she's not going to
 9 answer any questions that assume that as a
 10 predicate. They are objectionable as ambiguous
 11 and compound, and I instruct her not to answer.

12 THE WITNESS: On the instruction of my
 13 lawyer, I must invoke my Fifth Amendment
 14 privilege.

15 BY MR. KUVIN:

16 Q. Are you aware whether or not
 17 Jeffrey Epstein has had any homosexual relationships
 18 in the past?

19 MR. RHEINHART: Same objection as the
 20 previous question. The question as stated
 21 assumes this witness has some knowledge of
 22 Jeffrey Epstein. And since it assumes that
 23 fact, it is ambiguous and it's compound, and I
 24 instruct her not to answer.

25 THE WITNESS: On the instruction of my

1 BY MR. KUVIN:

2 Q. Do you know the magician by the name
 3 David Copperfield?

4 MR. RHEINHART: I'll instruct the witness
 5 not to answer based on her Fifth Amendment
 6 right.

7 THE WITNESS: On the instruction of my
 8 lawyer, I must invoke my Fifth Amendment
 9 privilege.

10 BY MR. KUVIN:

11 Q. You are aware, are you not, that
 12 David Copperfield has visited Jeffrey Epstein's home
 13 in Palm Beach?

14 MR. RHEINHART: Objection to the form as
 15 it once again assumes she has some knowledge of
 16 Jeffrey Epstein, or whether he has a home in
 17 Palm Beach. Because those facts are implicit
 18 in the question, the question is ambiguous and
 19 compound. I would instruct her not to answer
 20 based on her Fifth Amendment.

21 THE WITNESS: On the instruction of my
 22 lawyer, I must invoke my Fifth Amendment
 23 privilege.

24 BY MR. KUVIN:

25 Q. You are aware, are you not, that

1 David Copperfield and Jeffrey Epstein used to share
 2 for sexual -- for sex, girls under the age of 16?

3 MR. RHEINHART: Same objection as
 4 previously stated to the last I don't know how
 5 many questions. This question again assumes
 6 this witness knows Jeffrey Epstein, has any
 7 knowledge of Jeffrey Epstein's life. And
 8 because it assumes that fact, there is an
 9 underlying predicate it is ambiguous and
 10 compound. I would instruct her not to answer.

11 THE WITNESS: On the instruction of my
 12 lawyer, I must invoke my Fifth Amendment
 13 privilege.

14 BY MR. KUVIN:

15 Q. From the time you met Mr. Epstein, isn't
 16 it true that he would arrange for underage girls,
 17 girls under the age of 18, to have sex with every
 18 single day?

19 MR. RHEINHART: Let me try this again.
 20 Objection to the form. Any question you're
 21 going to ask her that assumes she knows
 22 Jeffrey Epstein, she's ever met Jeffrey
 23 Epstein, she's ever seen Jeffrey Epstein, knows
 24 where he lives, knows what he does, if it
 25 assumes that as part of the question, I will

1 privilege.

2 THE WITNESS: On the instruction of my
 3 lawyer, I must invoke my Fifth Amendment
 4 privilege.

5 BY MR. KUVIN:

6 Q. How many people did Jeffrey Epstein use to
 7 help him bring minor females to his house in Palm
 8 Beach for sex?

9 MR. RHEINHART: Same objection as the
 10 previous question and I instruct her not to
 11 answer.

12 THE WITNESS: On the instruction of my
 13 lawyer, I must invoke my Fifth Amendment
 14 privilege.

15 BY MR. KUVIN:

16 Q. Do you agree that Jeffrey Epstein is a
 17 child molester?

18 MR. RHEINHART: That question is solely
 19 intended to harass the witness and it's
 20 ambiguous as to what a child molester means,
 21 and you're asking for a legal conclusion and
 22 instruct her not to answer.

23 BY MR. KUVIN:

24 Q. In your own opinion.

25 MR. RHEINHART: I will again instruct her

1 deem the question to be ambiguous and compound,
 2 because you're asking her to admit as a
 3 predicate that she knows Mr. Epstein. As to
 4 any question like that, I am going to instruct
 5 her to take the Fifth Amendment on that basis.
 6 So I would again instruct her to take the Fifth
 7 Amendment as to that question.

8 THE WITNESS: On the instruction of my
 9 lawyer, I must invoke my Fifth Amendment
 10 privilege.

11 MR. KUVIN: If you want to short circuit
 12 that, anytime I mention Jeffrey Epstein you can
 13 have a standing objection on that issue. I
 14 have no problem.

15 MR. RHEINHART: Great.

16 BY MR. KUVIN:

17 Q. Can you explain, if you would, to a jury
 18 how Mr. Epstein would access underage minor females
 19 for sex every day?

20 MR. RHEINHART: The question is compound
 21 in that it asks about Mr. Epstein every day,
 22 underage females, and involves multiple
 23 questions in the same question, and also based
 24 on the standing objection, I would instruct her
 25 not to answer based on her Fifth Amendment

1 not to answer based on her Fifth Amendment
 2 privilege as well as the question having no
 3 legitimate basis and will not lead to
 4 discoverable evidence.

5 THE WITNESS: On the instruction of my
 6 lawyer, I must invoke my Fifth Amendment
 7 privilege.

8 BY MR. KUVIN:

9 Q. Would you agree that Jeffrey Epstein is
 10 obsessed with underage females?

11 MR. RHEINHART: Objection to the form.
 12 It's ambiguous as to what you mean by
 13 "obsessed." I'll instruct the witness not to
 14 answer based on her Fifth Amendment privilege,
 15 because the question assumes knowledge of
 16 Jeffrey Epstein.

17 THE WITNESS: On the instruction of my
 18 lawyer, I must invoke my Fifth Amendment
 19 privilege.

20 BY MR. KUVIN:

21 Q. How would you define the word "obsessed"?

22 MR. RHEINHART: You can answer that.

23 THE WITNESS: I don't know. You like it a
 24 lot. I don't know.

1 BY MR. KUVIN:

2 Q. Okay. Using your definition of obsessed,
3 would you agree with me that Jeffrey Epstein was
4 obsessed with underage females?5 MR. RHEINHART: Same objection; same
6 instruction.7 THE WITNESS: On the instruction of my
8 lawyer, I must invoke my Fifth Amendment
9 privilege.

10 BY MR. KUVIN:

11 Q. When was the first time that you learned
12 Mr. Epstein was getting a massage from a girl under
13 the age of 16?

14 MR. RHEINHART: One second.

15 MR. KUVIN: Sure.

16 MR. RHEINHART: I want to make the
17 standing objection for the reasons previously
18 stated, the question is otherwise also compound
19 in that it assumes multiple facts and asks her
20 to answer multiple questions at the same time.
21 I'll instruct her not to answer based on her
22 Fifth Amendment.23 THE WITNESS: On the instruction of my
24 lawyer, I must invoke my Fifth Amendment
25 privilege.

1 BY MR. KUVIN:

2 Q. Do you know who owns the home at 358
3 El Brillo Way?4 MR. RHEINHART: Same instructions as to
5 the standing objection.6 THE WITNESS: On the instruction of my
7 lawyer, I must invoke my Fifth Amendment
8 privilege.

9 BY MR. KUVIN:

10 Q. Have you been on Palm Beach Island before?

11 MR. RHEINHART: I am sorry. Can you
12 restate the question?

13 MR. KUVIN: Sure.

14 BY MR. KUVIN:

15 Q. Have you been on the Island of Palm Beach
16 before?17 MR. RHEINHART: You can answer that yes or
18 no.

19 THE WITNESS: Yes.

20 BY MR. KUVIN:

21 Q. How many times?

22 MR. RHEINHART: I'll instruct her not to
23 answer that question based on her Fifth
24 Amendment privilege.

25 THE WITNESS: On the instruction of my

1 lawyer, I must invoke my Fifth Amendment
2 privilege.

3 BY MR. KUVIN:

4 Q. Did you keep a journal with the names of
5 girls in it in the year 2005?6 MR. RHEINHART: Objection to the form as
7 ambiguous. What do you mean by "journal"?

8 MR. KUVIN: I will define it.

9 MR. RHEINHART: Please.

10 BY MR. KUVIN:

11 Q. Did you keep a pad of paper, either a
12 ringed notebook or some other format with the names
13 of girls and their phone numbers in it in 2005?14 MR. RHEINHART: I'll instruct the witness
15 not to answer based on her Fifth Amendment
16 privilege. Also the question remains
17 ambiguous.18 THE WITNESS: On the instruction of my
19 lawyer, I must invoke my Fifth Amendment
20 privilege.

21 BY MR. KUVIN:

22 Q. Would you agree with me that you kept a
23 pad of paper or a journal, however you want to
24 describe it, that contain the names of hundreds of
25 underage girls and their phone numbers?1 MR. RHEINHART: Object to the form of the
2 question. It's compound and asking her to
3 answer multiple questions at the same time.
4 It's also leading, and I would instruct her not
5 to answer based on her Fifth Amendment.6 THE WITNESS: On the instruction of my
7 lawyer, I must invoke my Fifth Amendment right.

8 BY MR. KUVIN:

9 Q. Would you agree with me that you kept a
10 pad of paper, notebook, or journal with the names of
11 hundreds of girls under the age of 16 so that you
12 could contact them and have them come to
13 Jeffrey Epstein's home for sex with him?14 MR. RHEINHART: Objection to the form as
15 compound and ambiguous, and I'll instruct her
16 not to answer based on Fifth Amendment.17 THE WITNESS: On the instruction of my
18 lawyer, I must invoke my Fifth Amendment
19 privilege.

20 BY MR. KUVIN:

21 Q. Do you know Alfredo Rodriguez?

22 MR. RHEINHART: I'll instruct the witness
23 not to answer based on her Fifth Amendment
24 privilege.

25 THE WITNESS: On the instruction of my

<p style="text-align: right;">Page 89</p> <p>1 lawyer, I must invoke my Fifth Amendment 2 privilege. 3 BY MR. KUVIN: 4 Q. Are you aware that Alfredo Rodriguez has 5 pled guilty to federal charges for hiding a journal 6 containing the names of women? 7 MR. RHEINHART: Objection to the form as 8 compound and instruct her not to answer. 9 THE WITNESS: On the instruction of my 10 lawyer, I must choose to invoke my Fifth 11 Amendment privilege. 12 BY MR. KUVIN: 13 Q. Do you have a personal fear of criminal 14 prosecution as you sit here today? 15 MR. RHEINHART: I instruct the witness -- 16 object to the form. That's the whole basis why 17 one would invoke the Fifth Amendment so clearly 18 she's does. I am not going to have her answer 19 the question. It's solely meant to harass. 20 MR. KUVIN: So is she not going to answer 21 that question? 22 MR. RHEINHART: She's not going to answer 23 that question. 24 MR. KUVIN: I think what I need to 25 establish is that she personally has a fear,</p>	<p>1 prosecution by either the State or the federal 2 government? 3 MR. RHEINHART: She's not answering that 4 question. She's not required to answer the 5 question. She's invoked her Fifth Amendment 6 privilege. She will continue to do so as to 7 that question. You can move on. 8 BY MR. KUVIN: 9 Q. Ma'am, are you invoking your Fifth 10 Amendment because your lawyer is advising you to 11 invoke your Fifth Amendment, or because you 12 personally have a fear that you might be prosecuted 13 by either the state or the federal government? 14 MR. RHEINHART: We have now been down this 15 street four times. She's not going to answer 16 the question. You can move along or we can 17 leave. 18 MR. KUVIN: I am just clarifying the 19 question, and I appreciate it. And you can 20 object. I just want to make sure that I have a 21 clear record of every possible machination of 22 the question so that I don't get hit later with 23 you didn't ask the specific question you need 24 to ask. So, I'm not doing it certainly to 25 harass. I just want to make sure that the</p>
<p style="text-align: right;">Page 90</p> <p>1 not her lawyer. So I would like to establish 2 whether the witness has a personal fear. 3 MR. RHEINHART: Well, first of all, under 4 the Fifth Amendment you don't have to be in 5 fear. You just have to believe that the 6 government believes you can be prosecuted for 7 something. She's been invoking the Fifth 8 Amendment on her own. It is implicit in her 9 invocation in what she fears. She's not going 10 to answer that question. 11 MR. KUVIN: Well, I tend to disagree. She 12 hasn't been invoking it on her own. She's been 13 invoking it after you have instructed her to 14 invoke it. So I want to know her personal -- 15 MR. RHEINHART: You can take that up with 16 the judge then. She's not answering the 17 question. She's invoking her Fifth Amendment 18 on her own accord based on the advice of her 19 lawyer. And you can take it up somewhere else, 20 but she's not answering that question. 21 MR. KUVIN: Well, then let me clarify the 22 record. 23 BY MR. KUVIN: 24 Q. Ma'am, are you invoking your Fifth 25 Amendment because you personally have a concern of</p>	<p>1 record is very clear of my question. 2 MR. RHEINHART: I understand. You can 3 move on. 4 BY MR. KUVIN: 5 Q. Ma'am, have you had any direct 6 communications with the State Attorney's office in 7 the last two years? 8 MR. RHEINHART: When you say "direct 9 communications," can you clarify? 10 MR. KUVIN: Yes. 11 BY MR. KUVIN: 12 Q. You, personally, have you spoken with 13 anyone in the State Attorney's office in the last 14 two years? 15 MR. KUVIN: I can't imagine there would be 16 a Fifth Amendment for that. 17 MR. RHEINHART: Let me consult. If I 18 might. Okay? 19 MR. KUVIN: Sure. 20 MR. RHEINHART: It would all depend on 21 what was said to her if she could consult with 22 them now. For example, if they consulted and 23 they told her they were about to prosecute, 24 then there could be a Fifth Amendment claim, 25 couldn't there?</p>

<p style="text-align: right;">Page 93</p> <p>1 MR. KUVIN: No, not as to the statements 2 they told her. I mean, that's certainly not 3 Fifth Amendment. That's something that was 4 told to her.</p> <p>5 MR. RHEINHART: We'll take that up 6 elsewhere if you need to. You can answer.</p> <p>7 MR. KUVIN: Okay.</p> <p>8 THE WITNESS: No, I have not.</p> <p>9 BY MR. KUVIN:</p> <p>10 Q. All right. Ma'am, have you had any 11 personal communications with anyone working for the 12 federal government in the last two years?</p> <p>13 MR. RHEINHART: When you say "the federal 14 government" do you mean the postal service, the 15 entire federal government, or do you want to 16 clarify that?</p> <p>17 MR. KUVIN: Well, I certainly could leave 18 it open-ended. If she's talked to a post 19 office employee, that would be interesting, but 20 certainly not to this case.</p> <p>21 BY MR. KUVIN:</p> <p>22 Q. Let's talk about the U.S. Attorney's 23 Office or anyone working on behalf of the U.S. 24 Attorney's Office.</p> <p>25 A. Have I personally ever spoken to anyone?</p>	<p style="text-align: right;">Page 95</p> <p>1 Q. Have you spoken with anybody at the U.S. 2 Attorney's Office in the last five years?</p> <p>3 A. No.</p> <p>4 Q. Have you spoken with anyone at the FBI in 5 the last five years?</p> <p>6 A. No.</p> <p>7 Q. Have you spoken with anyone at the 8 Palm Beach Police Department in the last five years?</p> <p>9 MR. RHEINHART: When you say, "the Palm 10 Beach Police," for any purpose or as related to 11 this case? Again, for example, if there was 12 like a parking ticket --</p> <p>13 MR. KUVIN: Sure.</p> <p>14 MR. RHEINHART: -- or some other thing, I 15 want to clarify that.</p> <p>16 BY MR. KUVIN:</p> <p>17 Q. Let's, let's start with broad, and we can 18 work to specific. Can you recall having any 19 conversations for any reason with the Palm Beach 20 Police Department in the last five years?</p> <p>21 A. No.</p> <p>22 Q. Okay. Do you have knowledge whether or 23 not the Palm Beach Police Department ever requested 24 for you to come in for an interview at any time in 25 the last five years?</p>
<p style="text-align: right;">Page 94</p> <p>1 Q. Yes, ma'am, personally have you ever had 2 any conversations with anyone at the U.S. Attorney's 3 Office or one of their -- one -- a person 4 representing to be from that office in the last two 5 years.</p> <p>6 A. No.</p> <p>7 Q. Okay. Do you know, as you sit here today, 8 whether or not you ever were requested to give a 9 statement by the State Attorney's office for the 10 Palm Beach Police Department?</p> <p>11 MR. RHEINHART: May I consult?</p> <p>12 MR. KUVIN: Yes.</p> <p>13 MR. RHEINHART: You may answer. And for 14 the record, I was just determining whether the 15 answer to that question would be protected by 16 the attorney-client privilege.</p> <p>17 MR. KUVIN: Understood.</p> <p>18 THE WITNESS: No, I don't. I don't know.</p> <p>19 BY MR. KUVIN:</p> <p>20 Q. Let me clarify the last two questions I 21 asked about the State Attorney's Office and the U.S. 22 Attorney's Office. Have you spoken with anybody 23 personally at the State Attorney's Office in the 24 last five years?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 96</p> <p>1 MR. RHEINHART: If you know the answer to 2 that question because that's something your 3 attorney told you, you don't have to answer 4 that question. Otherwise, go ahead and answer.</p> <p>5 THE WITNESS: No.</p> <p>6 BY MR. KUVIN:</p> <p>7 Q. Okay. When did you first retain an 8 attorney? What date did you first retain a -- I 9 mean, let me clarify. What date did you first 10 retain a criminal attorney?</p> <p>11 MR. RHEINHART: I'll instruct her not to 12 answer based on the Fifth Amendment privilege.</p> <p>13 THE WITNESS: On the instruction of my 14 lawyer, I must invoke my Fifth Amendment 15 privilege.</p> <p>16 BY MR. KUVIN:</p> <p>17 Q. Did you first retain a criminal attorney 18 in the year 2005?</p> <p>19 MR. RHEINHART: Same instruction.</p> <p>20 THE WITNESS: On the instruction of my 21 lawyer, I must invoke my Fifth Amendment 22 privilege.</p> <p>23 BY MR. KUVIN:</p> <p>24 Q. Did you retain a criminal attorney in 25 2004?</p>