

# **EXHIBIT 15**

## **(Filed Under Seal)**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendants.

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Related Cases:

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

VIDEOTAPED DEPOSITION OF NADIA MARCINKOVA  
TAKEN ON BEHALF OF THE PLAINTIFF

DATE: April 13, 2010

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U.S. Legal Support  
(561) 835-0220

	26	28
1	to his house to sexually molest; is that right?	1
2	MR. YAREMA: Object to the form.	2
3	A Fifth.	3
4	Q The first time she went to Jeffrey	4
5	Epstein's house was in 2002 when she was only 14	5
6	years old; is that true?	6
7	MR. YAREMA: Object to the form.	7
8	A Fifth.	8
9	Q In fact in 2002 you were only 18 years	9
10	old or so yourself; is that right?	10
11	A Fifth.	11
12	Q And E.W. is somebody you observed at	12
13	Jeffrey Epstein's house on more than 100	13
14	occasions between 2002 and 2005, a time period	14
15	between 14 and 17 years of age for her; is that	15
16	right?	16
17	MR. YAREMA: Object to the form.	17
18	A Fifth.	18
19	Q And each time E.W. was summoned to	19
20	Jeffrey Epstein's house, it was for the purposes	20
21	of Jeffrey Epstein sexually molesting her,	21
22	correct?	22
23	MR. YAREMA: Object to the form.	23
24	A Fifth.	24
25	Q If it was not Jeffrey Epstein personally	25
	27	29
1	calling E.W., you observed Sarah Kellen to call	1
2	E.W. for the purposes of her coming over and	2
3	pleasing Jeffrey Epstein sexually, correct?	3
4	MR. YAREMA: Object to the form.	4
5	A Fifth.	5
6	Q And do you remember the instance where	6
7	Jeffrey Epstein instructed you to lay down naked	7
8	and engage in a threesome with E.W. and Jeffrey	8
9	Epstein?	9
10	MR. YAREMA: Object to the form.	10
11	A Fifth.	11
12	Q Do you remember that that during that	12
13	threesome, Jeffrey Epstein demanded E.W. to	13
14	straddle you and otherwise engage sexually with	14
15	you while Jeffrey Epstein was using vibrators	15
16	and/or dildos on you?	16
17	MR. YAREMA: Object to the form.	17
18	A Fifth.	18
19	Q In addition to your sexual interactions	19
20	with E.W., isn't it true that you have used	20
21	strap-on dildos and vibrators on other underage	21
22	minors at Jeffrey Epstein's direction?	22
23	MR. YAREMA: Object to the form.	23
24	A Fifth.	24
25	Q You have given oral sex to underage	25

	30		32
1	involved in the planning of this scheme to gain	1	sex toys on you, correct?
2	access to underage minor females?	2	A Fifth.
3	MR. YAREMA: Object to the form.	3	Q And he has instructed you to use sex
4	A Fifth.	4	toys and vibrators on other underage minor
5	Q When is the first time that you observed	5	females, correct?
6	Jeffrey Epstein's method of enticing or inducing	6	MR. YAREMA: Object to the form.
7	underage minor females into sexual acts with him	7	A Fifth.
8	inside his bedroom?	8	Q You have observed Jeffrey Epstein
9	MR. YAREMA: Object to the form.	9	digitally penetrate the vagina of underage minor
10	A Fifth.	10	females, including E.W., correct?
11	Q Isn't it true that after an underage	11	MR. YAREMA: Object to the form.
12	minor female was brought to Jeffrey Epstein's	12	A Fifth.
13	house, typically Sarah Kellen, or Adriana or	13	Q As part of his plan to avoid detection
14	yourself would lead that underage minor female to	14	by law enforcement, you have observed Jeffrey
15	Jeffrey Epstein's bedroom and leave them alone in	15	Epstein to pay these underage minor females to be
16	the room; is that true?	16	quiet, correct?
17	MR. YAREMA: Object to the form.	17	MR. YAREMA: Object to the form.
18	A Fifth.	18	Q And this is something that he has told
19	Q Then Jeffrey Epstein would appear either	19	you he does, for the purposes of grooming these
20	naked or wearing a towel; is that true?	20	underage minor females, and avoiding law
21	MR. YAREMA: Object to the form.	21	enforcement detection, correct?
22	A Fifth.	22	MR. YAREMA: Object to the form.
23	Q This is his habit or method of	23	A Fifth.
24	operation, every single time, and that's	24	Q Jeffrey Epstein has talked to you about
25	something that he has told you about his sexual	25	
	31		33
1	interaction with underage minors; is that true?	1	the psychology of brainwashing or grooming
2	MR. YAREMA: Object to the form.	2	underage minor females to perform for him
3	A Fifth.	3	sexually, hasn't he?
4	Q And he would direct or demand or	4	MR. YAREMA: Object to the form.
5	instruct the underage minor female to remove her	5	A Fifth.
6	clothing; is that true?	6	Q And Sarah Kellen has also spoken with
7	MR. YAREMA: Object to the form.	7	you about the methodology behind gaining access
8	A Fifth.	8	to and grooming underage minor females for sex?
9	Q Then he would perform one or more lewd	9	MR. YAREMA: Object to form.
10	or lascivious or sexual acts on the underage	10	A Fifth.
11	minor female. Is that true?	11	Q Isn't it true that Ghislaine Maxwell and
12	MR. YAREMA: Object to the form.	12	yourself and Sarah Kellen had access to a master
13	A Fifth.	13	list of underage minor females names and phone
14	Q And you have observed Jeffrey Epstein	14	numbers so that they could be called?
15	engage in sexual interaction with underage minor	15	MR. GOLDBERGER: Time out. Are you
16	females on hundreds and hundreds of occasions,	16	talking to me, counsel?
17	correct?	17	MR. HOROWITZ: Nodding my head, back at
18	MR. YAREMA: Object to the form.	18	you. You were nodding at me.
19	A Fifth.	19	MR. GOLDBERGER: I wasn't nodding at
20	Q And you have observed Jeffrey Epstein	20	you. I'm not talking to you, I'm not
21	using vibrators and sexual toys on underage	21	communicating with you.. I don't know what
22	minors, true?	22	you think we are doing here. You said "It
23	MR. YAREMA: Object to the form.	23	is true," and I have no idea what you are
24	A Fifth.	24	talking about. Don't interrupt the
25	Q In fact, he has also used vibrators and	25	deposition, okay?

	34	36
1	MR, HOROWITZ: I think you interrupted.	1 A Fifth.
2	MR. GOLDBERGER: I didn't do a thing --	2 Q In addition to that system, isn't it
3	MR. EDWARDS: I don't know what's	3 true that Jeffrey Epstein traffics underage minor
4	happened here. It has deteriorated here for	4 females through a modeling agency?
5	no reason whatsoever and has nothing to do	5 MR. YAREMA: Object to the form.
6	with me or the witness.	6 A Fifth.
7	MR. GOLDBERGER: You're 100 percent	7 Q Is a modeling agency that he is involved
8	correct.	8 in with Jean Luc Brunel; you know who that is
9	MR. EDWARDS: Can we go back to it.	9 right?
10	MR. GOLDBERGER: Absolutely.	10 MR. YAREMA: Object to the form.
11	MR. EDWARDS: Perfect.	11 A Fifth.
12	The silent fight disrupted me. I lost	12 Q Are you familiar with MC-2 or MC-Squared
13	where I am now.	13 Modeling Agency?
14	MR. GOLDBERGER: Sorry.	14 A Fifth.
15	MR. EDWARDS: Can you read it back.	15 Q You know Jean Luc Brunel, right?
16	THE COURT REPORTER: Certainly.	16 MR. YAREMA: Object to the form.
17	(The record was read.)	17 A Fifth.
18	MR. EDWARDS: I'll rephrase the	18 Q Is Jean Luc Brunel somebody that you
19	question.	19 have been made to perform on sexually?
20	Q Isn't it true that yourself, Ghislaine	20 MR. YAREMA: Object to the form.
21	Maxwell and Sarah Kellen had access to a master	21 A Fifth.
22	of list of underage minor females names and phone	22 Q Jean Luc Brunel is somebody that you
23	numbers so they could be called for the purpose	23 know to also be a child molester, true?
24	of coming to Jeffrey Epstein's house to be	24 MR. YAREMA: Object to the form.
25	sexually molested?	25 A Fifth.
	35	37
1	MR. YAREMA: Object to the form.	1 Q This is somebody who for years the
2	A Fifth.	2 public has known of Jean Luc Brunel as a child
3	Q How many underage minor females are on	3 molester, true?
4	that master list?	4 MR. YAREMA: Object to the form.
5	MR. YAREMA: Object to the form.	5 A Fifth.
6	A Fifth.	6 Q In fact, that is the only thing Jeffrey
7	Q Are there photographs of these underage	7 Epstein and Jean Luc Brunel have in common, is
8	minor females on that master list?	8 their obsession for underage minor females,
9	MR. YAREMA: Object to the form.	9 correct?
10	A Fifth.	10 MR. YAREMA: Object to the form.
11	Q Is that master list saved on a computer	11 A Fifth.
12	system, as has been testified to in the past?	12 Q And the modeling agency is but one other
13	MR. YAREMA: Object to the form.	13 mechanism used by Jeffrey Epstein to gain access
14	A Fifth.	14 to underage minor females for sex, true?
15	Q Has Jeffrey Epstein talked to you about	15 MR. YAREMA: Object to the form.
16	the success of his scheme to procure underage	16 A Fifth.
17	minor females?	17 Q I read you the statute earlier on Lewd
18	MR. YAREMA: Object to the form.	18 and Lascivious Molestation, Chapter 800.04, and
19	A Fifth.	19 that's something that you have witnessed Jeffrey
20	Q By that, I mean, the method where he	20 Epstein violate on hundreds of occasions,
21	molests an underage minor female, then offers	21 correct?
22	them additional money if they will bring him	22 MR. YAREMA: Object to the form.
23	other underage minor females to molest; are you	23 A Fifth.
24	familiar with that system?	24 Q And something that you have witnessed
25	MR. YAREMA: Object to the form.	25 Jeffrey Epstein specifically violate, against

	46	48
1	A Fifth.	1
2	Q That particular message indicates it is	2
3	from Nadia. You're the only "Nadia" in the	3
4	house; is that correct?	4
5	MR. YAREMA: Object to the form.	5
6	A Fifth.	6
7	Q This is a call from you indicating that	7
8	██████████ cannot work today and █████ will be	8
9	here at 4:00 p.m.;" is that right?	9
10	MR. YAREMA: Object to the form?	10
11	A Fifth.	11
12	Q Who is █████?	12
13	A Fifth.	13
14	MR. YAREMA: Object to the form.	14
15	Q That's an underage minor female that was	15
16	scheduled to be molested at Jeffrey Epstein's	16
17	house?	17
18	MR. YAREMA: Object to the form.	18
19	A Fifth.	19
20	Q You scheduled that act of molestation;	20
21	is that right?	21
22	MR. YAREMA: Object to the form.	22
23	A Fifth.	23
24	Q And █████ will be at the house at 4:00	24
25	p.m. █████ is another underage minor female;	25
	47	49
1	is that correct?	1
2	MR. YAREMA: Object to the form.	2
3	A Fifth.	3
4	Q That's somebody else that you were	4
5	scheduling to come to his house at 4:00 p.m. for	5
6	Jeffrey Epstein to engage in sexual acts with	6
7	her, while she was an underage minor, true?	7
8	MR. YAREMA: Object to the form.	8
9	A Fifth.	9
10	Q Do you know Les Wexner?	10
11	A Fifth.	11
12	Q That's somebody that you know owns and	12
13	operates the Victoria's Secret, the Limited?	13
14	MR. YAREMA: Object to the form.	14
15	A Is that a question?	15
16	Q Is that somebody that you know to own	16
17	Victoria's Secret or operate Victoria's Secret?	17
18	A Fifth.	18
19	Q Do you know if Jeffrey Epstein still	19
20	talks with Leslie Wexner?	20
21	MR. YAREMA: Object to the form.	21
22	A Fifth.	22
23	Q Do you know Jane Doe-102?	23
24	A Fifth.	24
25	Q Are you aware of Jeffrey Epstein and	25

	58		60
1	Alan Dershowitz, meaning he continued to sexually	1	Q What was the purpose of that flight?
2	abuse minors despite Alan Dershowitz being a	2	MR. YAREMA: Object to the form.
3	guest in the house?	3	A Fifth.
4	MR. YAREMA: Object to the form.	4	Q Did you sign a confidentiality agreement
5	A Fifth.	5	with Jeffrey Epstein?
6	Q Alan Dershowitz never engaged in any	6	MR. YAREMA: Object to the form.
7	sexual activity with these underage minors; isn't	7	A Fifth.
8	that true?	8	Q When is the last time that you observed
9	MR. YAREMA: Object to the form.	9	Jeffrey Epstein have sex with a minor?
10	A Fifth.	10	MR. YAREMA: Object to the form.
11	Q Have you been made to have sex with	11	A Fifth.
12	Ghislaine Maxwell?	12	Q Since being on probation, has Jeffrey
13	MR. YAREMA: Object to the form.	13	Epstein been able to, or has he flown to his
14	A Fifth.	14	island?
15	Q Do you know [REDACTED]?	15	MR. YAREMA: Object to the form.
16	A Fifth.	16	A Fifth.
17	Q Similar to you being Jeffrey Epstein's	17	Q To your knowledge, has Jeffrey Epstein
18	sex slave, is [REDACTED], or was [REDACTED]	18	flown to New York while on probation or community
19	Ghislaine Maxwell's sex slave?	19	control?
20	MR. YAREMA: Object to the form.	20	MR. YAREMA: Object to the form.
21	A Fifth.	21	A Fifth.
22	Q Ghislaine Maxwell is somebody who you	22	Q Isn't it true that he has flown both to
23	know to be bi-sexual, true?	23	New York and to his island, and you have
24	MR. YAREMA: Object to the form.	24	accompanied him on those trips, since he was on
25	A Fifth.	25	community control?
	59		61
1	Q You know that Ghislaine Maxwell engaged	1	MR. YAREMA: Object to the form.
2	in sexual acts with underage minor females, true?	2	A Fifth.
3	MR. YAREMA: Object to the form.	3	Q Isn't it also true that Jeffrey Epstein
4	A Fifth.	4	has indicated to you that he will always engage
5	Q This is yet another friend of Jeffrey	5	in sex acts with underage minor females?
6	Epstein's that is into the act of molesting	6	MR. YAREMA: Object to the form.
7	underage minor females, right?	7	A Fifth.
8	MR. YAREMA: Object to the form.	8	Q In fact, that's something that he has
9	A Fifth.	9	told you, that he believes he is entitled to do;
10	Q Now, you are the next participant in	10	isn't that right?
11	that activity, meaning you have been groomed to	11	MR. YAREMA: Object to the form.
12	enjoy and appreciate the acts of sex with	12	A Fifth.
13	underage minors, true?	13	Q Isn't it true that Jeffrey Epstein
14	MR. YAREMA: Object to the form.	14	believes and has told you that if he doesn't
15	A Fifth.	15	physically force the underage minor female into
16	Q Has Jeffrey Epstein instructed you to	16	any act, then he is entitled to engage in sex
17	lie to his Probation Officer in any way?	17	with any underage minor female despite the age?
18	MR. YAREMA: Object to the form.	18	MR. YAREMA: Object to the form.
19	A Fifth.	19	A Fifth.
20	Q Mr. Visoski testified that you took a	20	Q What is the youngest female you have
21	helicopter flight within the last year with	21	witnessed or observed Jeffrey Epstein to engage
22	Jeffrey Epstein to Miami. Do you remember that	22	in sex with?
23	flight?	23	MR. YAREMA: Object to the form.
24	MR. YAREMA: Object to the form.	24	A Fifth.
25	A Fifth.	25	Q Do you have a bank account at Chase Bank

	98	100
1	A Fifth.	1 THE STATE OF FLORIDA)
2	Q Did you know that Jeffrey Epstein gave	2 COUNTY OF PALM BEACH)
3	A.D. a digital camera?	3 I, TERRI BECKER, a Registered
4	MR. YAREMA: Object to the form.	4 Professional Reporter and Notary Public for the
5	A Fifth.	5 State of Florida at Large, do hereby certify that
6	MS. EZELL: I don't have any other	6 I reported the videotaped deposition of NADIA
7	questions. Thank you.	7 MARCINKOVA, the WITNESS, called by the PLAINTIFF
8	MR. GOLDBERGER: You still have your	8 in the above-entitled action; that the witness
9	microphone on. You must have something on	9 was duly sworn by me; that the foregoing pages,
10	your mind, Brad.	10 numbered from 1 to 104, inclusive, constitute a
11	REDIRECT EXAMINATION	11 true record of the deposition by said witness.
12	BY MR. EDWARDS:	12 I further certify that I am not attorney
13	Q Ms. Marcinkova, through the whole day	13 or counsel of any of the parties, nor a relative
14	you've taken the Fifth on just about every single	14 or employee of any attorney or counsel connected
15	question. Is there any reason why we should not	15 with the action, nor financially interested in
16	presume that the answer to these questions would	16 the action.
17	incriminate you?	17 WITNESS MY HAND and official seal in the
18	MR. YAREMA: Object to the form.	18 City of West Palm Beach, County of Palm Beach,
19	A The Fifth.	19 State of Florida, this 19th day of April 2010.
20	Q The reason that you have taken the Fifth	20
21	is because the questions you have been asked	21
22	would have been answered in the affirmative and	22
23	you're afraid of prosecution for your	23
24	involvement, true?	24
25	MR. GOLDBERGER: Don't answer that	25
	99	101
1	question. It interferes with the	1 THE STATE OF FLORIDA)
2	attorney/client relationship that I have	2 COUNTY OF PALM BEACH)
3	with Ms. Marcinkova and any discussions she	3
4	and I may have had would come under that	4
5	privilege.	5 The foregoing certificate was
6	You can try and dance around that, but	6 acknowledged before me this _____
7	I'm simply not going to allow her to answer	7 day of _____ 2010.
8	that question. If you want to bring it up	8
9	with the Judge, you can.	9
10	MR. EDWARDS: Thanks, Jack.	10
11	MR. GOLDBERGER: Okay.	11
12	THE VIDEOGRAPHER: Off the video record	12
13	at 1:41 p.m.	13
14	THE COURT REPORTER: You're ordering	14
15	this, Brad?	15 Notary Public, State of Florida.
16	MR. EDWARDS: Yes. Copies?	16 My commission No.
17	MS. EZELL: Yes.	17 Expires March 13, 2011.
18	MR. YAREMA: Yes:	18
19	THE COURT REPORTER: And Adam wanted it;	19
20	is that right?	20
21	MR. EDWARDS: Yes.	21
22	(Time noted: 1:45 p.m.)	22
23		23
24		24
25		25