

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO. 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually,
and L.M., individually,

Defendant(s).

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

January 25, 2012
9:34 a.m. - 10:03 a.m.

SEARCY, DENNEY, SCAROLA, BARNHART & SHIPLEY, PA
2139 Palm Beach Lakes Boulevard
West Palm Beach Florida 33409

Stenographically Reported By:
Tammy Nestor, RPR

1 BY MR. SCAROLA:

2 Q Do you now or have you ever had a sexual
3 addiction?

4 MR. KNIGHT: I'm going to instruct him not
5 to answer the question. That's outside of the
6 area of this abuse of process lawsuit.

7 And just to let you know, he's here to
8 answer all the questions you want relative to
9 the abuse of process. The judge has been pretty
10 clear relative to the discovery regarding any of
11 the prior sexual allegations, et cetera. And
12 just so we don't waste your time or our time,
13 I'll be consistent on that per what the judge
14 has previously discussed regarding discovery.

15 MR. SCAROLA: Well, you and I have a very
16 different understanding of what the court's
17 prior rulings have been. But we'll let the
18 court deal with that.

19 BY MR. SCAROLA:

20 Q Do you now or have you ever had a sexual
21 preference for minors?

22 MR. KNIGHT: Same.

23 BY MR. SCAROLA:

24 Q Have you ever acted on a sexual preference
25 for minors?

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1 MR. KNIGHT: Same.

2 BY MR. SCAROLA:

3 Q Have you ever discussed with anyone
4 undertaking an effort to change your public image
5 following your arrest for and conviction of a
6 sex-related crime?

7 MR. KNIGHT: Same.

8 BY MR. SCAROLA:

9 Q Have you ever been convicted of a crime?

10 A Yes.

11 Q What was the crime of which you were
12 convicted?

13 A Two counts, one soliciting prostitution,
14 and procuring a minor for prostitution.

15 Q Did you, in fact, commit those acts?

16 MR. GOLDBERGER: I can invoke the Fifth
17 Amendment privilege for you or you can invoke
18 it yourself. I prefer you invoke the
19 privilege.

20 THE WITNESS: I'm going to invoke my Fifth
21 Amendment right.

22 BY MR. SCAROLA:

23 Q How many times have you solicited for
24 prostitution?

25 A I'm going invoke my Fifth Amendment right.

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1 MR. KNIGHT: Same.

2 BY MR. SCAROLA:

3 Q Have you ever informed anyone other than
4 your legal counsel that you have a sexual preference
5 for minors?

6 MR. KNIGHT: Same.

7 BY MR. SCAROLA:

8 Q Have you ever informed anyone other than
9 your legal counsel that you have acted on a sexual
10 preference for minors?

11 MR. KNIGHT: Same.

12 BY MR. SCAROLA:

13 Q Have you ever sought or received
14 evaluation, counseling, or treatment for any form of
15 sexual addiction?

16 MR. KNIGHT: Same.

17 BY MR. SCAROLA:

18 Q Have you ever sought or received
19 evaluation, counseling, or treatment for any
20 sex-related issue?

21 MR. KNIGHT: Same.

22 BY MR. SCAROLA:

23 Q Have you ever retained the services of a
24 consultant to assist in changing your public image
25 following your arrest on sex-related charges?

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1 Q How many times have you solicited a minor
2 for prostitution?

3 A Same answer.

4 Q How many times have you solicited for
5 prostitution in the State of Florida?

6 A Same answer.

7 Q How many times have you solicited a minor
8 for prostitution in the State of Florida?

9 A Same answer.

10 Q How many times have you solicited for
11 prostitution in the Virgin Islands?

12 MR. KNIGHT: Can we stop it here just for
13 a second? Can we go off the record for one
14 minute?

15 THE VIDEOGRAPHER: The time is 9:39. We
16 are going off the record.

17 (Thereupon, a discussion was held off the
18 record.)

19 MR. SCAROLA: I would like you to take it
20 down, please.

21 MR. KNIGHT: Fine.

22 MR. SCAROLA: And we'll go back on the
23 record. Thank you.

24 THE VIDEOGRAPHER: Stand by.

25 MR. KNIGHT: I'm wondering if you have any

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1 intention to ask any questions, and you may be,
 2 any questions outside of this clearly harassing
 3 area relative to issues that are outside of the
 4 four corners of the complaint or whether this
 5 is just going to be a continuance of questions
 6 of this witness that have no other means of
 7 advancing this lawsuit but only have means of
 8 doing other things of which I won't -- I don't
 9 care to list them here. Do you plan to go into
 10 other areas?

11 **MR. SCAROLA:** I am -- I am planning on
 12 taking a very thorough and comprehensive
 13 deposition of Mr. Epstein.

14 **MR. KNIGHT:** Are you asking -- planning to
 15 ask any questions that are not sexual or
 16 criminal in nature?

17 **MR. SCAROLA:** Oh, I'm sure there will be
 18 many that you would probably not consider
 19 sexual or criminal in nature, but I don't know.

20 **MR. KNIGHT:** Let's proceed for a little
 21 while, see what we can do, because certainly we
 22 have taken the time out to come up here,
 23 people's schedules have been made, et cetera,
 24 people have traveled long distances, but we may
 25 have to quit and go to the court.

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12
 1 for prostitution with respect to the claim on which
 2 you were convicted?

3 A Same answer.

4 Q Who is the minor that you solicited for
 5 prostitution with respect to the claim on which you
 6 pled guilty?

7 A Same answer.

8 Q Did you, in fact, plead guilty to
 9 soliciting for prostitution?

10 MR. KNIGHT: Asked and answered.

11 THE WITNESS: Yes, sir.

12 BY MR. SCAROLA:

13 Q Did you, in fact, plead guilty to
 14 soliciting a minor for prostitution?

15 A No.

16 Q Where was it that you solicited for
 17 prostitution in the manner -- in the matter in which
 18 you pled guilty?

19 A Same answer.

20 Q When was it that you solicited for
 21 prostitution in the matter in which you pled guilty?

22 A Same answer.

23 Q Have you ever discussed your sex-related
 24 arrest or conviction with any reporter or news media
 25 representative?

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11
 60
 1 BY MR. SCAROLA:
 2 Q Have you ever solicited for prostitution
 3 in the Virgin Islands?
 4 A Same answer.
 5 Q That is that the -- you are invoking your
 6 Fifth Amendment --
 7 A Yes.
 8 Q -- right?
 9 A Yes, Mr. Scarola.
 10 Q Have you ever solicited for prostitution
 11 in New York?
 12 A Same answer.
 13 Q Have you ever solicited for prostitution
 14 in New Mexico?
 15 A Same answer.
 16 Q Have you ever solicited for prostitution
 17 in Paris?
 18 A Same answer.
 19 Q Have you ever solicited for prostitution
 20 anywhere at any time?
 21 A Same answer.
 22 Q Have you ever solicited a minor for
 23 prostitution anywhere at any time?
 24 A Same answer.
 25 Q Who is the prostitute that you solicited

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13
 1 MR. KNIGHT: I'm going to instruct you not
 2 to answer the question.

3 MR. SCAROLA: And what is the basis of
 4 that instruction?

5 MR. KNIGHT: What is the basis?

6 MR. SCAROLA: Yes.

7 MR. KNIGHT: What does it have to do with
 8 this lawsuit? It's for no other reason other
 9 than to harass him. There are plenty of areas
 10 you can go into which are reasonable. We are
 11 here.

12 MR. SCAROLA: So the objection is
 13 relevancy, is that correct?

14 MR. KNIGHT: No, it goes beyond relevancy.

15 MR. SCAROLA: Well, what is it then?

16 MR. KNIGHT: Well, it is harassing. It is
 17 used -- it is being used to intimidate the
 18 witness. It is being used for various
 19 different reasons. And I believe it is
 20 improper.

21 BY MR. SCAROLA:

22 Q Have you ever discussed your sex-related
 23 activities with minors in the State of Florida with
 24 any reporter or news media representative?

25 MR. KNIGHT: Same instruction. We are

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1 going to take a quick break if we can go off
2 the record.

3 **THE VIDEOGRAPHER:** The time is 9:30 --
4 9:40. We are going off the record.

5 (Thereupon, a recess was taken at
6 9:43 a.m.)

7 **THE VIDEOGRAPHER:** The time is 9:50 a.m.
8 We are back on the record.

9 **MR. KNIGHT:** As I mentioned earlier, we
10 are here to answer questions relevant to the
11 lawsuit that is at issue.

12 Relative to your question earlier and the
13 instruction not to answer, I do believe it was
14 appropriate, but I'm going to have
15 Mr. Goldberger address what he believes the --
16 is the -- our client is entitled to, but at the
17 same time, there are other issues we want to put
18 on the record.

19 I will allow you to ask more questions, but
20 if it's going to stay on this line, we may have
21 to adjourn.

22 **MR. GOLDBERGER:** Okay. This is Jack
23 Goldberger. A couple issues. First, as to the
24 questions that, Mr. Scarola, you asked
25 concerning conversations that Mr. Epstein may

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1 that your client has filed an action to set
2 aside the non-prosecution agreement that
3 Mr. Epstein is a party to.

4 **MR. SCAROLA:** Would you please mark this
5 as Exhibit No. 1 to this deposition.

6 **MR. KNIGHT:** As soon as you get the
7 sticker on it, I'll look at that one.

8 (Thereupon, Deposition Exhibit No. 1 was
9 marked for identification.)

10 **THE VIDEOGRAPHER:** Is someone's phone by a
11 microphone or in their pocket?

12 **MR. GOLDBERGER:** I am.

13 **THE VIDEOGRAPHER:** If you can put it to
14 the side, please.

15 **MR. GOLDBERGER:** I'm all the way over
16 here.

17 **MR. KNIGHT:** Mine is off.

18 **MR. GOLDBERGER:** I'll shut it off.

19 **MR. KNIGHT:** Okay. Thank you.

20 **BY MR. SCAROLA:**

21 Q You have been handed a copy of what's been
22 marked as Exhibit No. 1 to this deposition. It is a
23 copy of Plaintiff's Third Amended Complaint in a
24 case styled LM versus Jeffrey Epstein.

25 Have you seen this document before?

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15 or may not have had with, I believe you couched
2 it as news reporters or news media, he would be
3 invoking Fifth Amendment privileges as to those
4 questions in addition to the objection raised
5 by Mr. Knight.

6 **MR. KNIGHT:** I'm withdrawing the
7 instruction.

8 **MR. GOLDBERGER:** Okay. All right. Anyhow
9 he's invoking Fifth Amendment privileges as to
10 that line of questioning.

11 As to the total line of questioning where
12 you are asking Mr. Epstein about sex-related
13 issues, as you know, your client, Mr. Edwards,
14 has filed a lawsuit in federal court where he is
15 seeking to overturn the non-prosecution
16 agreement that Mr. Epstein is a party to.

17 I believe that you are asking these
18 questions in an effort to further Mr. Edwards'
19 attempts to set aside that non-prosecution
20 agreement, and I think it serves no purpose
21 other than to assist your client in that
22 lawsuit. And I just think it's totally outside
23 the realm of the discovery that is allowed in
24 this case. And I'm simply not going to allow my
25 client to answer those questions given the fact

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1 A Not to the best of my recollection, no.

2 Q Do you recall having been sued by Bradley
3 Edwards on behalf of an individual who was
4 identified by the initials LM?

5 A Yes, sir.

6 Q And is this one of the cases that you
7 contend was abusively prosecuted by Bradley Edwards?

8 A I'm not sure if this is the exact
9 complaint.

10 Q Well, is this the case?

11 A I don't know.

12 Q Which case is it that you contend Bradley
13 Edwards abusively prosecuted against you?

14 A It was the LM case. I don't know if this
15 is the specific case.

16 Q Well, I want you to assume that there was
17 only one LM case that was filed by Bradley Edwards
18 against you.

19 A That's correct.

20 Q Do you have any recollection that is at
21 odds with that assumption?

22 A Yes, I do.

23 Q You have a recollection that there was, in
24 fact, a federal court case as well as a state court
25 case, correct?

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1 A Correct.
 2 Q All right. Now, is it your --
 3 A I believe that's --
 4 Q Is it your contention --
 5 MR. KNIGHT: Finish your answer. Did you
 6 finish your answer?
 7 THE WITNESS: That's all right.
 8 BY MR. SCAROLA:
 9 Q Is it your contention that Bradley --
 10 MR. KNIGHT: And any time you want to
 11 finish your answer, please do so.
 12 THE WITNESS: Sure.
 13 BY MR. SCAROLA:
 14 Q Is it your contention that Bradley Edwards
 15 abusively prosecuted the state court case on behalf
 16 of LM?
 17 A I don't know. Sorry.
 18 Q Is it your contention that Bradley Edwards
 19 abusively prosecuted the federal court case on
 20 behalf of LM?
 21 MR. KNIGHT: Objection, asks for legal
 22 conclusions. Obviously there were lawsuits
 23 that were raised in this case.
 24 MR. SCAROLA: You don't need to make a
 25 speaking objection --

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1 Mr. Adler have -- excuse me, Mr. Rothstein has now in
 2 deposition admitted that they needed to file a complaint to
 3 show investors that there was real action, in
 4 Mr. Rothstein's words, going on in federal court. The
 5 investors had not been able to find a filed complaint and
 6 had complained to Mr. Rothstein that there was no filed
 7 complaints two days, excuse me, before Mr. Edwards filed
 8 the federal complaint for 234.

9 Q Were you ever served with that complaint?
 10 A Not to the best of my recollection.
 11 Q So one contention is that Mr. Edwards
 12 abusively prosecuted a federal court action on
 13 behalf of LM with which you were never served,
 14 correct?
 15 A I had -- I was notified that the case was,
 16 in fact, filed.
 17 Q But you were never served with the case,
 18 correct?
 19 A I was notified that the case was filed.
 20 Q But you were never served with the case,
 21 correct?
 22 A Not to the best of my recollection.
 23 Q Okay. What damage did you incur as a
 24 consequence of the filing of a complaint with which
 25 you were never served?

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19
 1 MR. KNIGHT: Okay.
 2 MR. SCAROLA: -- that's intended to coach
 3 the witness, Mr. Knight.
 4 MR. KNIGHT: I'm going to object.
 5 MR. SCAROLA: So if you say you are
 6 objecting on the basis that it calls for a
 7 legal conclusion, that's fine. And now I would
 8 like the witness's answer unless you are
 9 instructing him not to answer.
 10 MR. KNIGHT: I'm not instructing him not
 11 to answer.
 12 BY MR. SCAROLA:
 13 Q Okay. Then would you please answer the
 14 question?
 15 A I'm sorry. Would you repeat it?
 16 Q Yes, sir. Is it your contention that
 17 Bradley Edwards abusively prosecuted the federal
 18 court action on behalf of LM?
 19 A Yes, sir.
 20 Q How?
 21 A Bradley Edwards filed a 234-count federal
 22 complaint in conjunction with his partner Scott
 23 Rothstein to enable his partners at RRA to defraud
 24 south Florida investors of millions of dollars.
 25 His partner Scott Rothstein and his partner

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21
 1 A I incurred many legal -- much legal fees,
 2 many legal fees, in fact, to try to figure out
 3 why -- what was going on and, in fact, getting
 4 prepared to defend the case though I had not yet
 5 been served.
 6 Q Were the allegations in the federal
 7 complaint on behalf of LM any different than the
 8 allegations in the state court case on behalf of LM?
 9 A I don't recall.
 10 Q Did you, in fact, engage in any sexual
 11 conduct with LM?
 12 A I'm sorry, but I'm sure -- the jury is
 13 going to recognize this is simply meant to harass
 14 me, and I'll have to take the Fifth Amendment since
 15 your client, Mr. Edwards, is trying to overturn my
 16 prosecution agreement.
 17 Q How many times did you engage in sexual
 18 conduct with LM?
 19 A I'm going to have to invoke my Fifth
 20 Amendment right again, sir.
 21 Q Do you know who LM is?
 22 A Again I'm going to assert my right.
 23 MR. KNIGHT: We are going to go off the
 24 record and take another break.
 25 THE VIDEOGRAPHER: The time is 9:58. We

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1 are going off the record.

2 (Thereupon, a recess was taken at
3 9:58 a.m.)

4 **THE VIDEOGRAPHER:** The time is 10:00. We
5 are on the record.

6 **MR. KNIGHT:** Okay. We have asked on
7 several occasions that you ask questions that
8 are relevant to the lawsuit at bar. There have
9 been some questions that were getting to it.
10 You are back into the sexual stuff which we
11 feel is inappropriate, and also relative to the
12 issues that were raised by Mr. Goldberger.

13 As such, we are going to recess and ask
14 further direction from the court on what is
15 allowable and what is not allowable in this
16 deposition.

17 **MR. SCAROLA:** So you are terminating the
18 deposition at this time?

19 **MR. KNIGHT:** We are recessing the
20 deposition to get direction from the court.

21 **MR. SCAROLA:** Until when?

22 **MR. KNIGHT:** We will find out what the
23 court says.

24 **MR. SCAROLA:** When? Are you contacting
25 the judge right now?

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1 Mr. Epstein as part of an ongoing and continuous
2 course of conduct supportive of claims for
3 punitive damages against Mr. Epstein and
4 supportive of RICO claims against him.

5 And had this deposition been permitted to
6 continue, we would have covered each of those
7 areas and substantially more.

8 **MR. KNIGHT:** Thank you.

9 **THE VIDEOGRAPHER:** The time is 10:03. We
10 are going off the record.

11 (Thereupon, the deposition was adjourned at
12 10:03 a.m.)

13 ---

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23
1 **MR. KNIGHT:** I am not. We are going to
2 file an appropriate motion and we are going to
3 take it to the judge and see what he does.
4 Thank you.

5 **MR. SCAROLA:** So that the record is clear,
6 it is my intention to ask very specific
7 questions about every factual allegation
8 included in every claim brought by Mr. Edwards
9 on behalf of every victim in every case in
10 which it is alleged that Mr. Edwards has
11 abusively prosecuted that claim.

12 I want to know about the connection between
13 Mr. Epstein and each one of those alleged
14 victims. I want to know about every individual
15 who had information concerning the events that
16 are alleged in those complaints, every
17 individual who was in a position to have
18 possibly had information about the events
19 alleged in those complaints.

20 I want to ask this witness about every
21 person whose deposition was taken and scheduled
22 to be taken, the relationship of those persons
23 to Mr. Epstein, knowledge that those persons may
24 have with respect to Mr. Epstein's activities
25 with minors, other crimes committed by

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CERTIFICATE OF REPORTER

STATE OF FLORIDA
COUNTY OF BROWARD

I, TAMMY NESTOR, Registered Professional
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did stenographically report the foregoing deposition of
JEFFREY EPSTEIN, that a review of the transcript was
requested, and that the transcript is a true record of
my stenographic notes

I further certify that I am not a relative,
employee, attorney, or counsel of any of the parties,
nor am I a relative or employee of any of the parties'
attorneys or counsel connected with the action, nor am I
financially interested in the action.

Dated this 25th day of January 2012.


TAMMY NESTOR, RPR

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CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF BROWARD

I, the undersigned authority, certify that
JEFFREY EPSTEIN personally appeared before me and was
duly sworn.

Witness my hand and official seal this 25th
day of January 2012.



Tammy Nestor, Court Reporter
Notary Public, State of Florida
Commission No.: EE 133933
Commission Exp. Date: 10/23/2015

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4 In Re: Epstein v Edwards
Case No. 502009CA040800XXXXMBAG
5 JEFFREY EPSTEIN
6 January 25, 2012

PAGE	LINE	CHANGE	REASON
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21			Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.
22			
23			
24			DATE JEFFREY EPSTEIN
25			

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January 25, 2012
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ATTN: CHRISTOPHER E. KNIGHT, ESQUIRE

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A	allegation (1)	aside (2)	bar (1)	BURNETT (2)
a.m (8)	23:7	15:19 16:2	22:8	2:9 27:2
1:13,13 4:3 14:6	allegations (3)	asked (3)	BARNHART ...	
14:7 22:3	6:11 21:6,8	12:10 14:24	1:16 2:4	
24:12 27:9	alleged (4)	22:6	basis (3)	
able (1)	23:10,13,16,19	asking (3)	13:3,5 19:6	
20:5	allow (2)	10:14 15:12,17	Beach (11)	
abuse (2)	14:19 15:24	asks (1)	1:1,16,17 2:5,5	
6:6,9	allowable (2)	18:21	2:13 4:7,7 5:14	
abusively (7)	22:15,15	assert (1)	5:19 27:22	
17:7,13 18:15	allowed (1)	21:22	behalf (14)	
18:19 19:17	Amended (2)	assist (2)	2:2,7 4:18,20,22	
20:12 23:11	3:12 16:23	7:24 15:21	4:24 17:3	
access (1)	Amendment (8)	association (1)	18:15,20 19:18	
27:10	8:17,21,25 11:6	4:12	20:13 21:7,8	
Ackerman (3)	15:3,9 21:14	assume (1)	23:9	
2:8 4:24,24	21:20	17:16	believe (5)	
acted (2)	announce (1)	assumption (1)	13:19 14:13	
6:24 7:9	4:13	17:21	15:1,17 18:3	
action (7)	answer (26)	attempts (1)	believes (1)	
16:1 19:18 20:3	6:5,8 9:3,6,9	15:19	14:15	
20:12 25:15,16	11:4,12,15,18	ATTERBUR...	best (3)	
27:11	11:21,24 12:3	2:12	17:1 20:10,22	
activities (2)	12:7,19,22	ATTN (1)	beyond (1)	
13:23 23:24	13:2 14:10,13	27:3	13:14	
acts (1)	15:25 18:5,6	attorney (3)	blank (1)	
8:15	18:11 19:8,9	25:13 27:11,16	27:18	
addiction (2)	19:11,13	attorneys (1)	bottom (1)	
6:3 7:15	answered (1)	25:15	27:18	
addition (1)	12:10	Australian (1)	Boulevard (4)	
15:4	appearances (2)	2:13	1:16 2:5 4:7 5:9	
address (4)	2:1 4:14	authority (1)	Brad (2)	
5:7,9,15 14:15	appeared (1)	26:6	4:16,16	
adjourn (1)	26:7	authorized (1)	Bradley (10)	
14:21	appointment (1)	25:7	1:7 17:2,7,12,17	
adjourned (1)	27:9	available (1)	18:9,14,18	
24:11	appropriate (2)	27:7	19:17,21	
Adler (1)	14:14 23:2	Avenue (4)	break (2)	
20:1	approximatel...	2:10,13 5:18	14:1 21:24	
admitted (1)	4:2	27:2	Brickell (2)	
20:2	area (2)		2:10 27:2	
advancing (1)	6:6 10:3	B	Brillo (1)	
10:7	areas (3)	B (1)	5:20	
agreement (4)	10:10 13:9 24:7	3:8	brought (1)	
15:16,20 16:2	arrest (3)	back (4)	23:8	
21:16	7:25 8:5 12:24	9:22 14:8 22:10	BROWARD (2)	
		27:13	25:4 26:4	
			CIRCUIT (2)	

1:1,1 claim (4) 12:1,5 23:8,11 claims (2) 24:2,4 clear (2) 6:10 23:5 Clearlake (1) 2:12 clearly (1) 10:2 Clerk (1) 27:16 client (6) 14:16 15:13,21 15:25 16:1 21:15 coach (1) 19:2 come (1) 10:22 Commission (2) 26:14,14 commit (1) 8:15 committed (1) 23:25 complained (1) 20:6 complaint (11) 3:12 10:4 16:23 17:9 19:22 20:2,5,8,9,24 21:7 complaints (3) 20:7 23:16,19 comprehensiv... 10:12 computer (1) 27:10 concerning (2) 14:25 23:15 conclusion (1) 19:7 conclusions (1) 18:22 conduct (3)	21:11,18 24:2 conducted (1) 4:6 conjunction (1) 19:22 connected (1) 25:15 connection (1) 23:12 consequence (1) 20:24 consider (1) 10:18 consistent (1) 6:13 consultant (1) 7:24 contacting (1) 22:24 contend (2) 17:7,12 contention (6) 18:4,9,14,18 19:16 20:11 continuance (1) 10:5 continue (1) 24:6 continuous (1) 24:1 conversations ... 14:25 convicted (3) 8:9,12 12:2 conviction (2) 8:5 12:24 copy (4) 16:21,23 27:12 27:12 corners (1) 10:4 correct (7) 13:13 17:19,25 18:1 20:14,18 20:21 couched (1) 15:1	counsel (6) 4:13,16 7:4,9 25:13,15 counseling (2) 7:14,19 counts (1) 8:13 COUNTY (3) 1:1 25:4 26:4 couple (1) 14:23 course (1) 24:2 court (18) 1:1 4:9 6:18 10:25 15:14 17:24,24 18:15 18:19 19:18 20:4,12 21:8 22:14,20,23 26:13 27:16 court's (1) 6:16 covered (1) 24:6 crime (3) 8:6,9,11 crimes (1) 23:25 criminal (2) 10:16,19 current (1) 5:7	day (2) 25:17 26:10 days (2) 20:7 27:15 deal (1) 6:18 declare (1) 28:21 defend (1) 21:4 DEFENDAN... 2:7 Defendant(s) (1) 1:9 defraud (1) 19:23 DENNEY (2) 1:16 2:4 deposition (17) 1:10 4:3,6 10:13 16:5,8,22 20:2 22:16,18,20 23:21 24:5,11 25:8 27:6,15 DESCRIPTI... 3:11 different (3) 6:16 13:19 21:7 direction (2) 22:14,20 discovery (3) 6:10,14 15:23 discussed (4) 6:14 8:3 12:23 13:22 discussion (1) 9:17 distances (1) 10:24 distribution (1) 27:13 document (2) 16:25 28:21 doing (1) 10:8 dollars (1) 19:24	duty (2) 5:2 26:8
				E E (4) 2:8 3:1,8 27:3 earlier (2) 14:9,12 East (2) 2:15 5:17 Edward (1) 5:8 Edwards (19) 1:7 4:5,16 15:13 17:3,7,13,17 18:14,18 19:17 19:21 20:7,11 21:15 23:8,10 27:4 28:3 Edwards' (1) 15:18 EE (1) 26:14 effort (2) 8:4 15:18 El (1) 5:20 email (1) 27:8 employee (2) 25:13,14 enable (1) 19:23 engage (2) 21:10,17 ENTER (1) 28:2 entitled (1) 14:16 Epstein (28) 1:4,10 3:12 4:4 4:4,19,21,23 4:25 5:1,8 10:13 14:25 15:12,16 16:3 16:24 23:13,23 24:1,3 25:9

26:7 27:4,25 28:3,4,24	15:14 17:24 18:19 19:17,21 20:4,8,12 21:6	25:8 28:21 form (1) 7:14 Forum (1) 27:21	16:12,15,18 22:12 guilty (5) 12:6,8,13,18,21	2:14 4:22,22 information (2) 23:15,18 informed (2) 7:3,8
Epstein's (1) 23:24	feel (1) 22:11	forwarded (1) 27:16	H	initials (1) 17:4
Errata (2) 27:13 28:1	fees (2) 21:1,2	found (1) 27:13	hand (1) 26:9	instruct (2) 6:4 13:1
Espirito (1) 2:9	Fifth (8) 8:16,20,25 11:6 15:3,9 21:14 21:19	four (1) 10:4	handed (1) 16:21	instructing (2) 19:9,10
ESQUIRE (6) 2:3,8,8,11,14 27:3	figure (1) 21:2	FOWLER (2) 2:9 27:2	harass (2) 13:9 21:13	instruction (4) 13:4,25 14:13 15:7
et (2) 6:11 10:23	file (2) 20:2 23:2	Friday (1) 27:10	harassing (2) 10:2 13:16	intended (1) 19:2
evaluation (2) 7:14,19	filed (10) 15:14 16:1	full (1) 5:6	held (1) 9:17	intention (2) 10:1 23:6
event (1) 27:12	17:17 19:21 20:5,6,7,16,19	further (3) 15:18 22:14 25:12	homes (1) 5:13	interested (1) 25:16
events (2) 23:15,18	27:16		Hook (1) 5:9	intimidate (1) 13:17
exact (1) 17:8	filings (1) 20:24	G	hours (1) 27:9	investors (3) 19:24 20:3,5
EXAMINATI... 3:3 5:4	financially (1) 25:16	getting (2) 21:3 22:9		invoke (6) 8:16,17,18,20 8:25 21:19
examined (1) 5:3	find (2) 20:5 22:22	give (1) 5:15		invoking (3) 11:5 15:3,9
excuse (3) 5:23 20:1,7	fine (2) 9:21 19:7	given (1) 15:25		Islands (3) 5:10 9:11 11:3
execute (1) 27:13	finish (3) 18:5,6,11	go (7) 9:13,22 10:9,25 13:10 14:1 21:23		issue (2) 7:20 14:11
Exhibit (4) 3:11 16:5,8,22	First (1) 14:23	goes (1) 13:14		issues (5) 10:3 14:17,23 15:13 22:12
Exp (1) 26:14	Floor (2) 2:10 27:2	going (23) 6:4 8:20,25 9:16 10:5 13:1 14:1 14:4,14,20 15:24 19:4 20:4 21:3,13 21:19,22,23 22:1,13 23:1,2 24:10		J
		Goldberger (13) 2:11,12 4:20,20 8:16 14:15,22 14:23 15:8		J (1) 1:7
				Jack (5) 2:3,11 4:15,20 14:22
F				January (7) 1:12 4:2 25:17 26:10 27:1,6 28:5
F-O-C-H (1) 5:19				
fact (9) 8:15 12:8,13 15:25 17:24 20:16 21:2,3 21:10				
facts (1) 28:21				
factual (1) 23:7				
federal (9)				

Jeffrey (15) 1:4,10 4:4,19,21 4:23,25 5:1,8 16:24 25:9 26:7 27:25 28:4,24	L.M (1) 1:8	10:6,7 meant (1) 21:13	never (4) 20:13,17,20,25	27:12
Joseph (2) 2:8 4:24	Lakes (3) 1:16 2:5 4:7	media (3) 12:24 13:24 15:2	new (8) 2:15,15 5:13,14 5:17,17 11:11 11:14	ordering (1) 27:16
JR (1) 2:8	lawsuit (7) 6:6 10:7 13:8 14:11 15:14,22 22:8	mentioned (1) 14:9	original (1) 27:15	outside (4) 6:5 10:2,3 15:22
judge (4) 6:9,13 22:25 23:3	lawsuits (1) 18:22	Mexico (3) 5:13,18 11:14	overturn (2) 15:15 21:15	15:15 21:15
JUDICIAL (1) 1:1	legal (8) 4:11 7:4,9 18:21 19:7 21:1,1,2	Miami (2) 2:10 27:3	non-prosecuti... 15:15,19 16:2	P
jury (1) 21:12	Let's (1) 10:20	microphone (1) 16:11	Notary (1) 26:13	p.m (1) 27:10
	letter (1) 27:18	mike (1) 5:24	notes (1) 25:11	PA (5) 1:16 2:4,9,12 27:2
	line (4) 14:20 15:10,11 28:7	millions (1) 19:24	notice (1) 27:6	PAGE (4) 3:3,11 28:2,7
	list (1) 10:9	Mine (1) 16:17	notified (2) 20:15,19	Palm (11) 1:1,16,17 2:5,5 2:13 4:7,7 5:13 5:19 27:22
K (1) 2:14	little (1) 10:20	minor (6) 8:14 9:1,7 11:22 12:4,14		Pardon (1) 5:21
Kennedy (1) 4:11	LM (14) 3:12 16:24 17:4 17:14,17 18:16 18:20 19:18 20:13 21:7,8 21:11,18,21	minors (6) 6:21,25 7:5,10 13:23 23:25		Paris (3) 5:14,18 11:17
Knight (44) 2:8 4:18,18 6:4 6:22 7:1,6,11 7:16,21 8:1,7 9:12,21,25 10:14,20 12:10 13:1,5,7,14,16 13:25 14:9 15:5,6 16:6,17 16:19 18:5,10 18:21 19:1,3,4 19:10 21:23 22:6,19,22 23:1 24:8 27:3	long (1) 10:24	minute (1) 9:14		part (1) 24:1
know (9) 6:7 10:19 15:13 17:11,14 18:17 21:21 23:12,14	look (1) 16:7	Monday (1) 27:10		parties (2) 25:13 27:14
knowledge (1) 23:23		motion (1) 23:2		parties' (1) 25:14
				partner (3) 19:22,25,25
				partners (1) 19:23
				party (3) 15:16 16:3 27:11
				penalties (1) 28:21
				people (1) 10:24
				people's (1) 10:23
				perjury (1) 28:21
L (1) 2:8	M	N (1) 3:1		
	maintain (1) 5:11	name (3) 4:15 5:6 27:18		
	manner (1) 12:17	nature (2) 10:16,19		
	mark (1) 16:4	need (1) 18:24		
	marked (2) 16:9,22	needed (1) 20:2		
	matter (3) 4:4 12:17,21	Nestor (6) 1:21 4:9 25:6,19 26:13 27:20		

permitted (1) 24:5	prepared (1) 21:4	15:20 put (2) 14:17 16:13	22:19 recognize (1) 21:13	residences (1) 5:11
person (1) 23:21	present (1) 4:17		recollection (5) 17:1,20,23 20:10,22	respect (3) 12:1,5 23:24
personally (1) 26:7	presently (1) 5:12	Q	record (15) 4:14 9:13,16,18 9:23 14:2,4,8 14:18 21:24	retained (1) 7:23
persons (2) 23:22,23	pretty (1) 6:9	question (4) 6:5 13:2 14:12 19:14	22:1,5 23:5 24:10 25:10	return (2) 27:13,18
Phipps (3) 4:10,12 27:21	previously (1) 6:14	questioning (2) 15:10,11	review (2) 25:9 27:7	RICO (1) 24:4
phone (1) 16:10	prior (2) 6:11,17	questions (14) 6:8 10:1,2,5,15 14:10,19,24 15:4,18,25 22:7,9 23:7	Red (1) 5:9	right (9) 8:21,25 11:8
Place (1) 27:21	privilege (2) 8:17,19	quick (1) 14:1	regarding (2) 6:10,14	15:8 18:2,7 21:20,22 22:25
PLAINTIFF (1) 2:2	privileges (2) 15:3,9	quit (1) 10:25	Registered (1) 25:6	Road (1) 5:18
Plaintiff's (1) 16:23	probably (1) 10:18		relationship (1) 23:22	Rothstein (5) 1:7 19:23,25 20:1,6
Plaintiff(s) (1) 1:5	proceed (1) 10:20	R	relative (7) 6:8,10 10:3 14:12 22:11 25:12,14	Rothstein's (1) 20:4
plan (1) 10:9	process (2) 6:6,9	raised (3) 15:4 18:23 22:12	relevancy (2) 13:13,14	RPR (3) 1:21 25:19 27:20
planning (2) 10:11,14	procuring (1) 8:14	Ranch (1) 5:18	relevant (2) 14:10 22:8	RRA (1) 19:23
Plaza (1) 2:9	production@... 27:9	read (3) 27:12,15 28:21	repeat (1) 19:15	rulings (1) 6:17
plead (2) 12:8,13	Professional (1) 25:6	read-only (1) 27:10	report (1) 25:8	S
please (12) 4:13 5:6,16 9:20 16:4,14 18:11 19:13 27:6,8 27:12,17	prosecuted (7) 17:7,13 18:15 18:19 19:17 20:12 23:11	real (1) 20:3	Reported (1) 1:21	S (1) 3:8
pled (3) 12:6,18,21	prosecution (1) 21:16	realm (1) 15:23	reporter (6) 4:9 12:24 13:24 25:1,7 26:13	Santo (1) 2:9
plenty (1) 13:9	prostitute (1) 11:25	reason (2) 13:8 28:7	reporters (1) 15:2	says (1) 22:23
pocket (1) 16:11	prostitution (1... 8:13,14,24 9:2,5 9:8,11 11:2,10 11:13,16,19,23	reasonable (1) 13:10	Reporting (3) 4:10,12 27:21	Scarola (44) 1:16 2:3,4 3:4 4:15,15 5:5 6:1
position (1) 23:17	12:1,5,9,14,17 12:21	reasons (1) 13:19	representative... 12:25 13:24	6:15,19,23 7:2 7:7,12,17,22
possibly (1) 23:18	public (3) 7:24 8:4 26:13	recall (2) 17:2 21:9	requested (1) 25:10	8:2,8,22 9:19 9:22 10:11,17
prefer (1) 8:18	punitive (1) 24:3	received (2) 7:13,18	residence (2) 5:7,9	11:1,9 12:12 13:3,6,12,15
preference (4) 6:21,24 7:4,10	purpose (1)	recess (3) 14:5 22:2,13		

13:21 14:24 16:4,20 18:8 18:13,24 19:2 19:5,12 22:17 22:21,24 23:5 schedule (1) 27:9 scheduled (1) 23:21 schedules (1) 10:23 Scott (3) 1:7 19:22,25 seal (1) 26:9 SEARCY (2) 1:16 2:4 second (1) 9:13 see (2) 10:21 23:3 seeking (1) 15:15 seen (1) 16:25 served (6) 20:9,13,17,20 20:25 21:5 serves (1) 15:20 services (2) 4:11 7:23 set (2) 15:19 16:1 sex-related (6) 7:20,25 8:6 12:23 13:22 15:12 sexual (12) 6:2,11,20,24 7:4 7:9,15 10:15 10:19 21:10,17 22:10 Sheet (2) 27:13 28:1 SHIPLEY (2) 1:16 2:4	show (1) 20:3 shut (1) 16:18 side (1) 16:14 sign (2) 27:15,17 signature (3) 27:7,17,23 simply (2) 15:24 21:13 sir (6) 5:21 12:11 17:5 19:16,19 21:20 solicited (15) 8:23 9:1,4,7,10 11:2,10,13,16 11:19,22,25 12:4,16,20 soliciting (3) 8:13 12:9,14 someone's (1) 16:10 soon (1) 16:6 sorry (3) 18:17 19:15 21:12 sought (2) 7:13,18 south (2) 2:13 19:24 speaking (1) 18:25 specific (2) 17:15 23:6 Stand (1) 9:24 state (10) 5:6 9:5,8 13:23 17:24 18:15 21:8 25:3 26:3 26:13 stated (1) 28:21 stay (1)	14:20 25:11 stenographic (1) 1:21 25:8 sticker (1) 16:7 stop (1) 9:12 Street (2) 2:15 5:17 stuff (1) 22:10 styled (1) 16:24 substantially (1) 24:7 sued (1) 17:2 Suite (2) 2:12 27:21 supportive (2) 24:2,4 sure (4) 10:17 17:8 18:12 21:12 sworn (2) 5:2 26:8 <hr/> T T (1) 3:8 take (6) 9:19 14:1 21:14 21:24 23:3 27:6 taken (5) 10:22 14:5 22:2 23:21,22 Tammy (6) 1:21 4:9 25:6,19 26:13 27:20 terminating (1) 22:17 testified (1) 5:3 Thank (4)	9:23 16:19 23:4 24:8 Thanks (1) 5:24 things (1) 10:8 think (2) 15:20,22 Third (2) 3:12 16:23 thirty (1) 27:15 thorough (1) 10:12 time (16) 4:2 6:12,12 9:15 10:22 11:20,23 14:3,7,17 18:10 21:25 22:4,18 24:9 27:6 times (6) 8:23 9:1,4,7,10 21:17 Today's (1) 4:1 total (1) 15:11 totally (1) 15:22 transcript (8) 25:9,10 27:7,10 27:12,12,13 28:2 traveled (1) 10:24 treatment (2) 7:14,19 true (2) 25:10 28:22 truly (1) 27:19 try (1) 21:2 trying (1) 21:15 two (2)	8:13 20:7 <hr/> U undersigned (1) 26:6 understandin... 6:16 undertaking (1) 8:4 <hr/> V v (3) 3:12 27:4 28:3 vacation (1) 5:13 various (1) 13:18 version (1) 27:10 versus (2) 4:4 16:24 victim (1) 23:9 victims (1) 23:14 Video (1) 4:11 videographer ... 4:1,10 5:21,23 9:15,24 14:3,7 16:10,13 21:25 22:4 24:9 videotaped (2) 1:10 4:3 Virgin (3) 5:10 9:11 11:3 vs (1) 1:6 <hr/> W waive (3) 27:7,17,23 want (7) 6:8 14:17 17:16 18:10 23:12,14 23:20 waste (1)
---	--	---	---	--

6:12	10/23/2015 (1)	30 (1)	9:39 (1)
way (2)	26:14	27:15	9:15
5:20 16:15	10:00 (1)	301 (1)	9:40 (1)
we'll (2)	22:4	2:15	14:4
6:17 9:22	10:03 (3)	33131 (2)	9:43 (1)
WEISS (1)	1:13 24:9,12	2:10 27:3	14:6
2:12	10065 (1)	33401 (2)	9:50 (1)
West (5)	2:15	2:13 27:22	14:7
1:17 2:5,13 4:7	10B (1)	33409 (2)	9:58 (2)
27:22	2:15	1:17 2:5	21:25 22:3
WHITE (2)	133933 (1)	358 (1)	
2:9 27:2	26:14	5:19	
wish (2)	1395 (2)	4	
27:12,17	2:10 27:2		
withdrawing (1)	1400 (1)	4 (1)	
15:6	2:12	3:4	
witness (11)	14th (2)	4:00 (1)	
5:2,22 8:20 10:6	2:10 27:2	27:9	
12:11 13:18	15TH (1)		
18:7,12 19:3	1:1	5	
23:20 26:9	16 (1)	500 (1)	
witness's (1)	3:12	27:21	
19:8	1615 (1)	502009CA040...	
wondering (1)	27:21	1:2 27:5 28:4	
9:25			6
words (1)	2		
20:4	2012 (7)	6100 (1)	
WRITE (1)	1:12 4:2 25:17	5:9	
28:2	26:10 27:1,6	66th (1)	
	28:5	2:15	
X	2139 (3)	7	
X (2)	1:16 2:5 4:6	71st (1)	
3:1,8	22 (1)	5:17	
	5:18		
Y	234 (1)	8	
York (5)	20:8	888)811-3408 ...	
2:15,15 5:14,17	234-count (1)	27:8	
11:11	19:21		
	25 (5)	9	
Z	1:12 4:2 27:1,6	9 (1)	
Zorro (1)	28:5	5:17	
5:18	250 (1)	9:00 (1)	
	2:13	27:9	
0	25th (2)	9:30 (1)	
	25:17 26:9	14:3	
1		9:34 (2)	
1 (4)	3	1:13 4:3	
3:12 16:5,8,22			