

EXHIBIT 1

Page 1	Page 3
<p>UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA</p> <p>CASE NO. 08-CIV-80119-MARRA/JOHNSON</p> <p>JANE DOE NO. 2, Plaintiff, -vs- VOLUME I OF III JEFFREY EPSTEIN, Defendant.</p> <hr/> <p>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</p> <hr/> <p>VIDEOTAPED DEPOSITION OF SARAH KELLEN</p> <p>Wednesday, March 24, 2010 10:37 - 6:51 p.m.</p> <p>250 Australian Avenue South Suite 1500 West Palm Beach, Florida 33401</p> <p>Reported By: Cynthia Hopkins, RPR, FPR Notary Public, State of Florida Prose Court Reporting Services Job No.: 1484</p>	<p>1 IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT 2 IN AND FOR PALM BEACH COUNTY, FLORIDA CASE NO. 502008CA028051XXXXMB AB</p> <p>3 4 L.M., 5 Plaintiff, 6 -vs- VOLUME I OF III 7 JEFFREY EPSTEIN, 8 Defendant.</p> <hr/> <p>9 10 11 12 VIDEOTAPED DEPOSITION OF 13 SARAH KELLEN 14 15 Wednesday, March 24, 2010 10:37 - 6:51 p.m.</p> <p>16 17 18 250 Australian Avenue South Suite 1500 19 West Palm Beach, Florida 33401</p> <p>20 21 22 Reported By: Cynthia Hopkins, RPR, FPR 23 Notary Public, State of Florida Prose Court Reporting Services 24 Job No.: 1484 25</p>
Page 2	Page 4
<p>1 IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT 2 IN AND FOR PALM BEACH COUNTY, FLORIDA 3 CASE NO. 502008CA028058XXXXMB AD</p> <p>4 E.W., 5 Plaintiff, 6 -vs- VOLUME I OF III 7 JEFFREY EPSTEIN, 8 Defendant.</p> <hr/> <p>9 10 11 VIDEOTAPED DEPOSITION OF 12 SARAH KELLEN 13 14 Wednesday, March 24, 2010 10:37 - 6:51 p.m.</p> <p>15 16 17 250 Australian Avenue South Suite 1500 18 West Palm Beach, Florida 33401</p> <p>19 20 21 Reported By: Cynthia Hopkins, RPR, FPR 22 Notary Public, State of Florida Prose Court Reporting Services 23 Job No.: 1484 24 25</p>	<p>1 IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL 2 CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA 3 CASE No.502008CA037319XXXXMB AB</p> <p>4 B.B. 5 Plaintiff, 6 -vs- VOLUME I OF III 7 JEFFREY EPSTEIN AND SARAH KELLEN, 8 Defendants.</p> <hr/> <p>9 10 11 VIDEOTAPED DEPOSITION OF 12 SARAH KELLEN 13 14 Wednesday, March 24, 2010 10:37 - 6:51 p.m.</p> <p>15 16 17 250 Australian Avenue South Suite 1500 18 West Palm Beach, Florida 33401</p> <p>19 20 21 Reported By: Cynthia Hopkins, RPR, FPR 22 Notary Public, State of Florida Prose Court Reporting Services 23 Job No.: 1484 24 25</p>

Page 5

APPEARANCES:

On behalf of the Plaintiffs, B.B.:

SPENCER T. KUVIN, ESQUIRE

LEOPOLD KUVIN

2925 PGA Boulevard

Suite 200

Palm Beach Gardens, Florida 33410

Phone: 561.515.1400

On behalf of the Plaintiffs, L.M., E.W. and
Jane Doe:

MATTHEW WEISSING, ESQUIRE

FARMER, JAFFE, WEISSING, EDWARDS

FISTOS & LEHRMAN, P.L.

425 North Andrews Avenue

Suite 2

Fort Lauderdale, Florida 33301

Phone: 954.524.2820

On behalf of Jane Does 1 through 8:

ADAM D. HOROWITZ, ESQUIRE

MERMELSTEIN & HOROWITZ, P.A.

18205 Biscayne Boulevard

Suite 2218

Miami, Florida 33160

Phone: 305.931.2200

E-mail: Ahorowitz@sexabuseattorney.com

On behalf of the Plaintiffs, 101, 102 and 103:

KATHERINE W. EZELL, ESQUIRE

AMY JOSEFSBERG EDERI, ESQUIRE

PODHURST ORSECK

25 West Flagler Street

Suite 800

Miami, Florida 33130

Phone: 305.358.2800

(Via telephone)

Page 6

Appearances continued...

On behalf of the Plaintiff, Jane Doe II:

ISIDRO MANUEL GARCIA, ESQUIRE

GARCIA, ELKINS & BOEHRINGER

224 Datura Avenue, Suite 900

West Palm Beach, Florida 33401

Phone: 561.832.8033

On behalf of the Defendant:

JACK ALAN GOLDBERGER, ESQUIRE

ATTERBURY, GOLDBERGER & WEISS, P.A.

250 Australian Avenue South

Suite 1400

West Palm Beach, Florida 33401-5012

Phone: 561.659.8300

On behalf of the Witness:

BRUCE E. REINHART, ESQUIRE

LAW OFFICE OF BRUCE E. REINHART

One Clearlake Center

250 South Australian Avenue, Suite 1400

West Palm Beach, Florida 33401

Phone: 561.202.6360

ALSO PRESENT:

Jessica Cadwell, Paralegal

Burman, Critton, Luttier & Coleman, P.A.

Joseph Kozak, Videographer

Prose Court Reporting Services

Page 7

INDEX

EXAMINATION DIRECT CROSS REDIRECT

SARAH KELLEN

BY MR. KUVIN 9

EXHIBITS

EXHIBIT DESCRIPTION PAGE

PLAINTIFF'S EX. 1 PHOTO 16

PLAINTIFF'S EX. 2 JEJE, INC., 24

PASSENGER MANIFEST

PLAINTIFF'S EX. 3 HYPERION AIR, INC.,

PASSENGER MANIFEST

PLAINTIFF'S EX. 6 PHOTO 63

PLAINTIFF'S EX. 7 PHOTO 65

PLAINTIFF'S EX. 8 PHOTO 68

PLAINTIFF'S EX. 9 PHOTO 71

PLAINTIFF'S EX. 10 PHOTO 100

PLAINTIFF'S EX. 11 PHOTO 101

PLAINTIFF'S EX. 12 PHOTO 103

PLAINTIFF'S EX. 4 PHONE MESSAGE PADS

PLAINTIFF'S EX. 5 CELLPHONE RECORDS

PLAINTIFF'S EX. 13 PHOTO 144

Page 8

PROCEEDINGS

THE VIDEOGRAPHER: We are now on video record. This is Media No. 1 in the videotaped deposition of Sarah Kellen in the matter of Jane Doe versus Jeffrey Epstein, et al. Today is Wednesday, March 24th, 2010. It is 10:36 a.m. We are here at Prose Court Reporting, 250 South Australian Avenue, West Palm Beach, Florida.

My name is Joe Kozak. I'm the videographer. The reporter is Cindy Hopkins from Prose Court Reporting Agency.

Would counsel please introduce yourselves, and then the court reporter will swear in the witness.

MR. KUVIN: Good morning. Spencer Kuvin on behalf of one of the Plaintiffs.

MR. HOROWITZ: Adam Horowitz on behalf of Jane Does 2 through 8. And just for the record purposes, the deposition is also being taken in the federal cases, I believe, case being Jane Doe 2 versus Jeffrey Epstein.

MR. WEISSING: Matt Weissing on behalf of three of the Plaintiffs.

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 Reinhart 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 97

1 MR. RHEINHART: Same instruction.
 2 THE WITNESS: On the instruction of my
 3 lawyer, I must invoke my Fifth Amendment
 4 privilege.
 5 BY MR. KUVIN:
 6 Q. Have you ever worked as a professional
 7 model?
 8 MR. RHEINHART: May I consult?
 9 MR. KUVIN: Sure.
 10 MR. RHEINHART: You can answer the
 11 question.
 12 THE WITNESS: Yes.
 13 BY MR. KUVIN:
 14 Q. When?
 15 A. I don't remember. I don't remember the dates.
 16 It was at least maybe ten years ago.
 17 Q. And you're how old now?
 18 MR. RHEINHART: I'll instruct the witness
 19 not to answer the question. Nice try.
 20 Instruct you not to answer based on
 21 your Fifth Amendment privilege.
 22 THE WITNESS: On the instruction of my
 23 lawyer, I'm going to invoke my Fifth Amendment
 24 privilege.
 25 MR. KUVIN: I'm just trying to find out.

Page 98

1 MR. RHEINHART: Like I said, good try.
 2 Move on.
 3 BY MR. KUVIN:
 4 Q. With respect to your work as a
 5 professional model, what company did you work for?
 6 MR. RHEINHART: Instruct the witness not
 7 to answer based on the Fifth Amendment
 8 privilege.
 9 THE WITNESS: On the instruction of my
 10 lawyer, I invoke my Fifth Amendment privilege.
 11 BY MR. KUVIN:
 12 Q. What is your understanding of
 13 Mr. Epstein's involvement with the modeling
 14 industry?
 15 MR. RHEINHART: Standing objection, and
 16 instruct the witness not to answer based on
 17 Fifth Amendment, on that basis.
 18 THE WITNESS: Upon the instruction of my
 19 lawyer, I must invoke my Fifth Amendment
 20 privilege.
 21 BY MR. KUVIN:
 22 Q. Were you ever promised anything regarding
 23 your modeling career by Jean-Luc Brunel?
 24 MR. RHEINHART: Instruct the witness not
 25 to answer based on Fifth Amendment, also

Page 99

1 assumes facts that have not been established
 2 and it's compound.
 3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment
 5 privilege.
 6 MR. RHEINHART: And to clarify the
 7 objection is that it assumes that she's ever
 8 met or knows anything about Jean-Luc Brunel.
 9 BY MR. KUVIN:
 10 Q. Were you ever promised anything regarding
 11 your modeling career by Jeffrey Epstein?
 12 MR. RHEINHART: Same objection, instruct
 13 the witness not to answer.
 14 THE WITNESS: On the instruction of my
 15 lawyer, I must invoke my Fifth Amendment
 16 privilege.
 17 BY MR. KUVIN:
 18 Q. You would agree with me that there is a
 19 financial arrangement between Jean-Luc Brunel and
 20 Jeffrey Epstein, do you not?
 21 MR. RHEINHART: Objection. It assumes she
 22 has any knowledge of either Mr. Epstein or
 23 Mr. Brunel, and as to that she is going to
 24 invoke her Fifth Amendment privilege. The
 25 question is compound and therefore ambiguous.

Page 100

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
 6 Ghislaine Maxwell provides underage girls to
 7 Mr. Epstein for sex?
 8 MR. RHEINHART: Objection to the form. It
 9 assumes she knows anything at all about
 10 Ghislaine Maxwell and asks her to assume that
 11 she does, and therefore it is compound and
 12 ambiguous, and I would instruct her not to
 13 answer.
 14 THE WITNESS: Upon the instruction of my
 15 lawyer, I must invoke my Fifth Amendment
 16 privilege.
 17 MR. KUVIN: That's a good point. Take a
 18 look at what we'll mark as Exhibit 10.
 19 (Plaintiff's Exhibit No. 10 was marked for
 20 identification.)
 21 MR. KUVIN: All me to show it to the
 22 camera first.
 23 MR. RHEINHART: Okay.
 24 MR. KUVIN: Okay.
 25 THE WITNESS: Okay.

25 (Pages 97 to 100)

Page 101

1 BY MR. KUVIN:

2 Q. Take a look at what we marked as Exhibit
3 10. Do you recognize the two people in that
4 photograph?

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. Would you agree with me that's
13 Ghislaine Maxwell on the right and Jeffrey Epstein
14 on the left?

15 MR. RHEINHART: Objection to the form. It
16 assumes that she knows who Ghislaine Maxwell
17 and Jeffrey Epstein are, and therefore it's
18 compound and ambiguous, and I would instruct
19 her not to answer.

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

23 MR. KUVIN: Okay. I will mark this as
24 Exhibit 11.
25

Page 102

1 (Plaintiff's Exhibit No. 11 was marked for
2 identification.)

3 BY MR. KUVIN:

4 Q. Let me show you what we marked as
5 Exhibit 11. Hang on one second.

6 MR. RHEINHART: Sure.

7 BY MR. KUVIN:

8 Q. Do you recognize the young lady shown in
9 Exhibit 11?

10 MR. RHEINHART: I'll instruct the witness
11 not to answer based on her Fifth Amendment
12 privilege.

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

16 BY MR. KUVIN:

17 Q. Do you agree with me that the young girl
18 shown in Exhibit 11 was recruited by Ghislaine
19 Maxwell to, for sexual activity with
20 Jeffrey Epstein?

21 MR. RHEINHART: Objection to the form. It
22 assumes she knows who the person is in Exhibit
23 11, and assumes she knows who Ghislaine Maxwell
24 is, and assumes she knows who Jeffrey Epstein
25 is, and is therefore compound.

Page 103

1 You're asking the witness three
2 questions at the same time, and I would
3 instruct her not to answer based on the
4 Fifth Amendment.

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

8 MR. KUVIN: Just so we're clear, had she
9 answered the first two questions, then
10 obviously I wouldn't have to ask the third one
11 that has all of them in it but --

12 MR. RHEINHART: If you had accepted her
13 answer, you would have known that she wasn't
14 going to answer these, and we could have saved
15 a few minutes.

16 MR. KUVIN: And as you well know, I must
17 ask the question in order to gain the inference
18 at trial.

19 MR. RHEINHART: I understand.

20 MR. KUVIN: All right.

21 (Plaintiff's Exhibit No. 12 was marked for
22 identification.)

23 BY MR. KUVIN:

24 Q. Do you recognize the gentleman that is
25 shown --

Page 104

1 MR. RHEINHART: We'll have a job here.

2 MR. KUVIN: That is true.

3 BY MR. KUVIN:

4 Q. -- that is shown in Exhibit 12?

5 MR. KUVIN: Let me hold this for the
6 camera first.

7 MR. RHEINHART: I'm sorry. Is there a
8 question pending?

9 MR. KUVIN: Yes.

10 BY MR. KUVIN:

11 Q. Do you recognize the gentleman shown in
12 Exhibit 12?

13 MR. RHEINHART: I instruct her not to
14 answer based on the Fifth Amendment.

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

18 BY MR. KUVIN:

19 Q. Would you agree with me that that is
20 Prince Andrew shown in Exhibit 12?

21 MR. RHEINHART: Same instruction.

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

26 (Pages 101 to 104)