

# EXHIBIT 1

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

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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.

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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

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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

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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

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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.	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.
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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	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.

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.  
251 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 --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.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