

EXHIBIT 11

PART 2

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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.

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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

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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 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)

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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

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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.

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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 --

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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)

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1 BY MR. KUVIN:

2 Q. Would you agree with me that you have been
3 present where Jeffrey Epstein and Prince Andrew have
4 had sexual relations with underage girls?

5 MR. RHEINHART: Objection to the form,
6 it's compound in that it assumes she knows who
7 the person is in Picture 12, she knows who
8 Prince Andrew is, and she knows who Jeffrey
9 Epstein is. It's compound and ambiguous, and
10 I'll instruct her not to answer based on her
11 Fifth Amendment.

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 Prince Andrew
17 and Jeffrey Epstein used to share underaged girls
18 for sexual relations?

19 MR. RHEINHART: Same objection previously
20 stated, requires her to also speculate who
21 Prince Andrew is. I instruct her not to answer
22 based on the Fifth Amendment.

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

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1 MR. RHEINHART: Also requires speculation
2 as to who Jeffrey Epstein is as well.

3 BY MR. KUVIN:

4 Q. Do you know who Prince Andrew is?

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

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

10 MR. KUVIN: It's almost 12:00. Do you
11 want to take a quick lunch?

12 MR. RHEINHART: Sure. How much longer do
13 you think you will be, Mr. Kuvin, before we go
14 on to other counsel?

15 MR. KUVIN: Probably not that much longer.

16 MR. RHEINHART: Okay.

17 MR. KUVIN: I have to get through a couple
18 of more generic stuff, and then get into the
19 specifics of my cases and then --

20 MR. RHEINHART: Okay. So, we, but just so
21 we have a sense of planning whether this is the
22 right time for a lunch break. You're not going
23 to finish in the next 15 or 20 minutes?

24 MR. KUVIN: No, not even close.

25 MR. RHEINHART: Okay. Let's take a lunch

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1 break now.

2 MR. KUVIN: Okay.

3 THE VIDEOGRAPHER: We're now off video
4 record. The time is 11:57 a.m.

5 (A luncheon recess was held.)

6 (Plaintiff's Exhibit No's 4 was marked for
7 identification.)

8 (Plaintiff's Exhibit No. 5 was marked for
9 identification.)

10 THE VIDEOGRAPHER: We're now on video
11 record. The time is 1:02 p.m.

12 MR. KUVIN: All right, counsel. I'm going
13 to ask a couple more general questions, and
14 then when we get into the specifics of the
15 individual girls, I just want to make sure,
16 once again, on the record, as we've done in
17 every deposition in this case, that we'll use
18 the Plaintiff's full name with the
19 understanding that the final transcript will
20 only contain their initials, and there will be
21 a key at the conclusion that's only provided to
22 the parties in this case and their counsel to
23 be kept confidential going forward. But
24 obviously, for the purposes of this deposition,
25 we will be using full names.

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1 MR. RHEINHART: Agreed.

2 MR. KUVIN: Okay. Is there any
3 disagreement with that around the table?

4 MR. HOROWITZ: Agreed.

5 MR. WEISSING: Agreed.

6 MS. EZELL: Agreed.

7 MR. KUVIN: Jack, do you agree to the --

8 MR. GOLDBERGER: I thought I'm not a part
9 of it.

10 MR. KUVIN: Well, you've been playing a
11 part, so I want to make sure you agree.

12 MR. GOLDBERGER: Yeah, I agree. I agree.

13 MR. RHEINHART: Hold on. Let me just
14 explain to her what we're talking about.

15 MR. KUVIN: Please do.

16 MR. RHEINHART: But when the transcript is
17 typed up, it won't have her name it will just
18 have initials. But we'll get a code that
19 explains the name. So that way you would be
20 asked if you recognize the name not a set of
21 initials that you may not understand or a Jane
22 Doe number that you do not know.

23 MR. KUVIN: That's way too confusing.
24 Okay?

25 MR. RHEINHART: Correct.

27 (Pages 105 to 108)

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1 BY MR. KUVIN:

2 Q. Let's take a look at what I've marked --
3 premarked as Exhibit 4. It's a stack of documents,
4 just so you understand what this is and your
5 attorney can object or agree or disagree as he sees
6 fit, but this is a stack of documents that was part
7 of the trash pull from Jeffrey Epstein's home as
8 part of the criminal investigation. Just so you're
9 aware of what these are.

10 MR. RHEINHART: That was retrieved, that
11 was retrieved by the Palm Beach Police
12 Department from the trash --

13 MR. KUVIN: That's correct.

14 MR. RHEINHART: -- at the home of what is
15 known to be Mr. Epstein's home?

16 MR. KUVIN: Correct.

17 MR. RHEINHART: Okay.

18 MR. KUVIN: All right. And that's not a
19 question. I just wanted to kind of give you a
20 context for what I'm going to be asking you
21 about.

22 MR. RHEINHART: Thank you.

23 BY MR. KUVIN:

24 Q. All right. In taking a look at Exhibit 4,
25 I'd like you to take a look at the front page, the

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1 first page of those documents.

2 Is that your handwriting, ma'am?

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

6 THE WITNESS: At the instruction of my
7 lawyer, I must exercise my Fifth Amendment
8 right.

9 BY MR. KUVIN:

10 Q. And, in fact, that is your handwriting on
11 this notepad, is it not?

12 MR. RHEINHART: Same instruction. It's
13 the same question.

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

16 BY MR. KUVIN:

17 Q. In this note do you agree that you
18 arranged for an extension of one month on the rental
19 car for a young lady under the age of 16?

20 MR. RHEINHART: Objection to the form. It
21 is compound. It assumes that this is her
22 handwriting. It doesn't identify who the young
23 lady might be, and it's otherwise ambiguous, so
24 I instruct her not to answer on the Fifth
25 Amendment privilege in addition to the legal

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1 objection to the form.

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

5 BY MR. KUVIN:

6 Q. Yes. Do you know Alex Hall?

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

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

13 BY MR. KUVIN:

14 Q. Will you agree with me that on the first
15 page of Exhibit 4, you were to arrange for roses to
16 be delivered to Jane Doe No. 103 at her high school
17 performance?

18 MR. RHEINHART: Objection to the form.
19 It's compound in that it assumes this is the
20 witness's handwriting and assumes the witness
21 knows a person by the name of Jane Doe No. 103
22 and the witness otherwise knows Jeffrey Epstein
23 whose name is at the bottom of the paper, and
24 therefore, it's compound and ambiguous, and
25 instruct her not to answer.

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

4 MR. KUVIN: I forgot to mention this at
5 the beginning, but objection to form usually
6 covers all that stuff like vague and compound,
7 and --

8 MR. RHEINHART: Okay.

9 MR. KUVIN: -- I'll leave it up to you,
10 but objection to form as far as the civil arena
11 context will cover all of those.

12 MR. RHEINHART: Just figured I'd make the
13 record clear in case we ever have an issue, or
14 in case you want to correct it based on what I
15 believe to be the improper form, I will give
16 you a chance to correct it.

17 BY MR. KUVIN:

18 Q. No problem. All right. On Page 2 of
19 Exhibit 4, if you'd take a look at that. Is that
20 your handwriting?

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

24 THE WITNESS: On the instruction of my
25 lawyer, I choose to exercise my Fifth Amendment

28 (Pages 109 to 112)

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1 right.
 2 BY MR. KUVIN:
 3 Q. Do you know who Larry is, as referred to
 4 in Page 2 of Exhibit 4?
 5 MR. RHEINHART: I'm sorry. Can you --
 6 BY MR. KUVIN:
 7 Q. Do you know who --
 8 MR. RHEINHART: -- restate the question?
 9 BY MR. KUVIN:
 10 Q. Do you know who Larry is as referred to in
 11 Page 2 of Exhibit 4?
 12 MR. RHEINHART: So, just so I'm clear,
 13 what the question is, the document on its face
 14 has the name Larry in it. You're just asking
 15 this witness whether she knows who this person
 16 Larry is?
 17 MR. KUVIN: Correct.
 18 MR. RHEINHART: Instruct the witness not
 19 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. Do you know why Larry was recommending
 25 that Mr. Epstein leave?

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1 MR. RHEINHART: Objection to the form and
 2 instruct the witness not to answer based upon
 3 her Fifth Amendment privilege.
 4 THE WITNESS: On the instruction of my
 5 lawyer, I must invoke my Fifth Amendment right.
 6 BY MR. KUVIN:
 7 Q. Would you agree with me that Larry was
 8 calling to warn Mr. Epstein to leave town because he
 9 was going to be arrested?
 10 MR. RHEINHART: Objection to the form.
 11 The question assumes facts that are not before
 12 her, and it requires her to speculate, and also
 13 implies that she knows anything at all about
 14 Jeffrey Epstein, so I will instruct her not to
 15 answer.
 16 THE WITNESS: On the instruction of my
 17 lawyer, I wish to exercise my Fifth Amendment
 18 right.
 19 BY MR. KUVIN:
 20 Q. Take a look at Page 3 of Exhibit 4,
 21 please. Is that your handwriting?
 22 MR. RHEINHART: I'll instruct her not to
 23 answer based on the Fifth Amendment privilege.
 24 MR. KUVIN: Before we do that, would you
 25 consult with her?

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1 MR. RHEINHART: Okay. I would be happy
 2 to.
 3 MR. KUVIN: I just want to clarify,
 4 because I don't think --
 5 MR. RHEINHART: Okay.
 6 MR. KUVIN: I don't think this is a
 7 problem, but I just want to clear it up.
 8 MR. RHEINHART: Thank you, Mr. Kuvin.
 9 I'll let her answer that question.
 10 MR. KUVIN: Not a problem.
 11 MR. RHEINHART: So the question pending
 12 is, is that your handwriting?
 13 MR. KUVIN: Correct.
 14 BY MR. KUVIN:
 15 Q. Is this your handwriting? Just yes or no.
 16 A. No.
 17 Q. Okay. Thank you. All right. Let's look
 18 at Page 4 of Exhibit 4. All right. This one's a
 19 little different. Is this your handwriting?
 20 MR. RHEINHART: Let me consult with her
 21 again.
 22 Okay. That's fine. You can answer
 23 the question consistent with the
 24 conversation we just had.
 25 THE WITNESS: No.

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1 BY MR. KUVIN:
 2 Q. Do you know who Danielle is as referred to
 3 in this note of Page 4 of Exhibit 4?
 4 MR. RHEINHART: Instruct the witness not
 5 to answer based on her Fifth Amendment
 6 privilege.
 7 THE WITNESS: On the instruction of my
 8 lawyer, I must exercise my Fifth Amendment
 9 right.
 10 BY MR. KUVIN:
 11 Q. All right. Let's look at Page 5,
 12 Exhibit 4.
 13 Before we go to Page 5, rather, going
 14 back to Page 4 for a minute. Will you agree with me
 15 that Danielle as referred to in Page 4 of Exhibit 4
 16 is a girl that is under the age of 16?
 17 MR. RHEINHART: Object to the form. You
 18 previously asked if she knew who Danielle was,
 19 and she invoked her Fifth Amendment privilege.
 20 Since the new question presumes that she does
 21 know who Danielle is she is going to invoke her
 22 Fifth Amendment privilege upon my instruction.
 23 MR. KUVIN: All right. Let's look at
 24 Page 5.
 25 MR. RHEINHART: Let her answer.

29 (Pages 113 to 116)

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1 MR. KUVIN: I'm sorry, go ahead.

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

5 BY MR. KUVIN:

6 Q. All right. Take a look at Page 5, if you
7 would. Have you ever ordered anything, anything
8 yourself from Amazon.com?

9 MR. RHEINHART: You're asking for herself
10 or anyone else if she has ever placed an order
11 with Amazon.com for any reason?

12 MR. KUVIN: I am asking whether she
13 personally has ever placed an order with a
14 company called Amazon.com.

15 MR. RHEINHART: Yes or no. You can answer
16 that.

17 THE WITNESS: Yes.

18 BY MR. KUVIN:

19 Q. Okay. So you would agree with me that you
20 know what Amazon.com is?

21 A. Yes.

22 Q. Okay. Now, have you ever placed an order
23 through Amazon.com for things to be delivered at
24 358 El Brillo Way?

25 MR. RHEINHART: Instruct the witness to

1 that Page 5 of Exhibit 4 appears to be a receipt for
2 books ordered through Amazon.com?

3 MR. RHEINHART: You can answer that yes or
4 no.

5 THE WITNESS: It looks like a receipt from
6 Amazon.

7 BY MR. KUVIN:

8 Q. Okay. And did you place this order for
9 Jeffrey Epstein?

10 MR. RHEINHART: Instruct the witness not
11 to answer the question in that the question
12 presumes that she knows who Jeffrey Epstein is,
13 and therefore, I instruct her not to answer.

14 THE WITNESS: On advice of counsel, I must
15 invoke my Fifth Amendment privilege.

16 BY MR. KUVIN:

17 Q. Have you ever read the book identified in
18 Page 5 of Exhibit 4 called Slave Craft: Road Maps
19 for Erotic Servitude - Principals, Skills and Tools?

20 MR. RHEINHART: Instruct the witness not
21 to answer based on her Fifth Amendment
22 privilege.

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

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1 invoke her Fifth Amendment privilege as to that
2 question.

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

6 BY MR. KUVIN:

7 Q. Will you agree with me --

8 MR. RHEINHART: I'm sorry, Mr. Kuvin, for,
9 for the record, the page, pages of this exhibit
10 are not numbered, but the page we're looking at
11 purports to be a receipt for an order from
12 Amazon.com; is that correct?

13 MR. KUVIN: Correct. I just want her to
14 establish foundation before I got into
15 specifics.

16 MR. RHEINHART: No, but you referred to it
17 as Page 5, but they are not numbered, so I just
18 wanted to make sure that we're looking at the
19 same page on the exhibit.

20 MR. KUVIN: That is true. I'm just trying
21 to establish foundation for the questions I'm
22 about to ask her.

23 MR. RHEINHART: Understood.

24 BY MR. KUVIN:

25 Q. All right. Ma'am, would you agree with me

1 BY MR. KUVIN:

2 Q. Did you ever see that book I just
3 described at the home of Jeffrey Epstein on
4 358 El Brillo Way?

5 MR. RHEINHART: Objection to the form in
6 that it presumes she knows Jeffrey Epstein and
7 has ever been to 358 El Brillo Way. So, I
8 instruct her not to answer based on the Fifth
9 Amendment.

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

13 BY MR. KUVIN:

14 Q. Have you ever seen the book, Training With
15 Miss Abernathy: A Workbook for Erotic Slaves and
16 Their Owners, at the home of Jeffrey Epstein on
17 358 El Brillo Way?

18 MR. RHEINHART: Same objection and same
19 instruction as the previous question.

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

23 BY MR. KUVIN:

24 Q. Have you ever read that book that I just
25 described which is shown in Page 5 of Exhibit 4?

30 (Pages 117 to 120)

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1 MR. RHEINHART: Same instruction.

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

5 BY MR. KUVIN:

6 Q. Let's look at the sixth page of Exhibit 4,
7 please. Is that your handwriting?

8 A. No.

9 Q. All right. Let's look at Page 7. Is that
10 your handwriting?

11 A. No.

12 Q. Okay. Look at the next page which would
13 be Page 8. Is that your handwriting?

14 A. No.

15 Q. Let's see how much quicker this goes.
16 Let's look at Page 9. Is that your handwriting?

17 A. No.

18 Q. Look at Page 9 again, if you would.

19 MR. RHEINHART: When you say Page 9,
20 that's the page that purports to say 10:00.

21 MR. KUVIN: Dr. Bard.

22 MR. RHEINHART: -- Dr. Bard at the top?

23 MR. KUVIN: Correct.

24 MR. RHEINHART: Okay.
25

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1 BY MR. KUVIN:

2 Q. Do you know who Dr. Bard is?

3 MR. RHEINHART: Instruct the witness not
4 to answer based on the Fifth Amendment, because
5 this sheet of paper has Jeffrey Epstein's name
6 on the bottom, so the question implies that she
7 knows some connection between Dr. Bard and
8 Mr. Epstein.

9 MR. KUVIN: Hang on a minute. Based on
10 the objection, let me reword the question.

11 BY MR. KUVIN:

12 Q. Independent from this note and independent
13 from anyone who may or may not be known as
14 Jeffrey Epstein, do you know anyone by the name of
15 Dr. Bard?

16 A. I'm sorry. Ask the question again.

17 Q. Yes. I don't want you to assume anything
18 from, the purpose of my question has anything to do
19 with someone who may be known as Jeffrey Epstein.

20 All I'm asking you is, generally, do
21 you know a person by the name of Dr. Bard?

22 MR. RHEINHART: Let me consult.

23 MR. KUVIN: Yes, yeah.

24 THE WITNESS: At the advice of counsel, I
25 must invoke my Fifth Amendment right.

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1 BY MR. KUVIN:

2 Q. This note, Page 9 of Exhibit 4, appears to
3 state that Sarah is trying to move -- and then
4 there's a blanked out name, for 11 then Brittany
5 could work at 6. Do you know anyone with the name
6 Brittany?

7 MR. RHEINHART: If she knows anyone in the
8 world by that name?

9 MR. KUVIN: Yeah. We could start with
10 that.

11 MR. RHEINHART: I'm saying, in the
12 context, are you asking in the context of this
13 note which you just read, or are you asking,
14 generically, does she know anyone in the world
15 by the name of Brittany?

16 MR. KUVIN: Why don't we first do it in
17 the context of this note.

18 BY MR. KUVIN:

19 Q. Is this note referring to you when it
20 says, "Sarah"?

21 MR. RHEINHART: Instruct the witness not
22 to answer based on her Fifth Amendment
23 privilege.

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

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1 BY MR. KUVIN:

2 Q. In the context of this note, do you know
3 who Brittany is?

4 MR. RHEINHART: Same instruction.

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

7 BY MR. KUVIN:

8 Q. All-right. Let's look at Page 10.

9 MR. RHEINHART: Mr. Kuvin, let me go back.

10 MR. KUVIN: Sure.

11 MR. RHEINHART: As to Page 1 of this
12 exhibit, I think you had asked the witness
13 whether this was her handwriting.

14 MR. KUVIN: Do you want to have her go
15 back and answer?

16 MR. RHEINHART: Yes, I would. Having
17 consulted with her further, I will have her go
18 back to this question.

19 MR. KUVIN: Let's do that. I'll, I'll go
20 back and ask the question so that we can be
21 clear.

22 BY MR. KUVIN:

23 Q. On the Exhibit 4, the first page of
24 Exhibit 4, ma'am, is that your handwriting? Yes or
25 no.

31 (Pages 121 to 124)

Page 125

1 A. No.

2 Q. Okay. All right. Let's skip Page 10,
3 because I think that's just a duplicate, and go to
4 Page 11, if you would.

5 MR. RHEINHART: Page 11 is --

6 MR. KUVIN: It looks like DTG Operations,
7 d/b/a Dollar Rent a Car.

8 MR. RHEINHART: Got it. It's a printed
9 sheet, not a handwritten sheet.

10 MR. KUVIN: Correct.

11 MR. RHEINHART: Okay. Thank you.

12 BY MR. KUVIN:

13 Q. All right. Do you know a gentleman by the
14 name of Janusz Banasiak, spelled J-a-n-u-s-z,
15 B-a-n-a-s-i-a-k?

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

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

22 BY MR. KUVIN:

23 Q. Ma'am, isn't it true that you rented cars
24 through Dollar Rent a Car for underage girls, girls
25 under the age of 18?

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

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

7 BY MR. KUVIN:

8 Q. Did you rent any cars from Dollar Rent a
9 Car in West Palm Beach in the last five years?

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. Let's take a look at Page 11.

16 MR. RHEINHART: If we can just -- let me
17 go back, Mr. Kuvin, to clarify the prior two
18 questions. When you say, "did you rent," did
19 you mean did she personally pay for the rental,
20 or was she, in any way, involved in arranging
21 the rental?

22 MR. KUVIN: The second part, in any way
23 involved in arranging for the rental of a
24 vehicle.

25 MR. RHEINHART: That's how I interpreted

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1 it in giving my advice, so thank you for
2 clarifying.

3 MR. KUVIN: Absolutely.

4 BY MR. KUVIN:

5 Q. All right. In Page 11 of Exhibit 4,
6 there's a reference in the top right-hand corner, a
7 message to a Mr. Goldsmith. Do you see that?

8 A. Uh-huh.

9 Q. Yes?

10 MR. RHEINHART: You have to say yes or no
11 on the record.

12 THE WITNESS: Yes, I see it.

13 BY MR. KUVIN:

14 Q. Okay. All right. Do you know who
15 Mr. Goldsmith is?

16 MR. RHEINHART: I instruct the witness
17 not to answer based on her privilege against
18 self-incrimination.

19 THE WITNESS: At the advice of counsel, I
20 must invoke my Fifth Amendment privilege.

21 BY MR. KUVIN:

22 Q. Is this your handwriting on exhibit -- on
23 the messages shown in Exhibit 4, Page 11?

24 MR. RHEINHART: Same instruction.

25 THE WITNESS: At the advice of counsel, I

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1 must invoke my Fifth Amendment privilege.

2 MR. RHEINHART: Hold on a second, Sarah.

3 MR. KUVIN: Yeah, check.

4 MR. RHEINHART: Okay. Can you repeat the
5 question again? Maybe I misheard it,
6 Mr. Kuvin.

7 MR. KUVIN: Yeah, not a problem. Let me
8 lay a little foundation for it.

9 MR. RHEINHART: That's okay. If you can
10 just ask the question again. I think I just
11 misheard what you were asking.

12 BY MR. KUVIN:

13 Q. Is this your handwriting shown on the
14 messages which is Page 11 of Exhibit 4?

15 A. No.

16 Q. Okay. Is this handwriting that of
17 Ms. Sjoberg?

18 MR. KUVIN: Johanna -- I'm sorry, Sjoberg,
19 Sjoberg? How do you pronounce it, Sjoberg?

20 MS. CADWELL: Sjoberg?

21 MR. KUVIN: I knew somebody would know.

22 MR. RHEINHART: Did we get a
23 pronunciation, I'm sorry?

24 MR. KUVIN: Yes.

32 (Pages 125 to 128)

Page 129

1 BY MR. KUVIN:

2 Q. Is this the handwriting of
3 Johanna Sjoberg, if you know?

4 MR. RHEINHART: Hold on. Let me object to
5 the form in that it presumes she knows what
6 Ms. Sjoberg's handwriting is like or that she's
7 ever known Ms. Sjoberg. So before you ask the
8 question, try to clarify that.

9 MR. KUVIN: Well, that's what I'm trying
10 to find out.

11 BY MR. KUVIN:

12 Q. Do you recognize this as the handwriting
13 of Johanna Sjoberg? And it can be a yes or no.

14 MR. RHEINHART: My, my objection to the
15 form is that you, you haven't asked her whether
16 she actually knows who Johanna Sjoberg is, or
17 whether she would recognize her handwriting if
18 she saw it.

19 MR. KUVIN: I would love to ask that
20 question if she'd answer it.

21 MR. RHEINHART: Well, if she'll answer,
22 that's a different question. But I think you
23 need to ask it first otherwise this question is
24 ambiguous.

25 MR. KUVIN: All right.

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1 BY MR. KUVIN:

2 Q. Not, not to beat a dead horse on the
3 point, do you know Johanna Sjoberg?

4 MR. RHEINHART: I instruct the witness not
5 to answer.

6 THE WITNESS: On advice of counsel, I must
7 invoke my Fifth Amendment privilege.

8 BY MR. KUVIN:

9 Q. Have you seen Johanna Sjoberg's
10 handwriting in the past?

11 MR. RHEINHART: Objection to the form as
12 previously stated. I'll instruct the witness
13 not to answer.

14 THE WITNESS: On advice of counsel, I must
15 invoke my Fifth Amendment privilege.

16 BY MR. KUVIN:

17 Q. Do you recognize Page 11 in Exhibit 4 as
18 the handwriting of Johanna Sjoberg?

19 MR. RHEINHART: Objection to the form for
20 the reasons previously stated many, many times,
21 and I will instruct her not to answer.

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

24 BY MR. KUVIN:

25 Q. Did you ever see these messages that

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1 appear to be directed -- well, let me, let me back
2 up.

3 Page 11 of Exhibit 4 appears to be a
4 message dated October 2nd, 2005, from Sarah. Do you
5 see that top left-hand corner?

6 A. Yes.

7 Q. Okay. At 10:40 a.m. My question is: Did
8 you call and leave a message at 10:40 a.m. on
9 October 2, 2005, stating: Julia's sick and she
10 can't come today?

11 MR. RHEINHART: Instruct the witness not
12 to answer the question based on her Fifth
13 Amendment privilege.

14 THE WITNESS: On the instruction of my
15 lawyer I must exercise my Fifth Amendment
16 privilege.

17 BY MR. KUVIN:

18 Q. Upside down at the bottom of Page 11 is
19 another phone message dated 10/1 of 2005. Appears
20 to be written to someone named Sarah. Do you see
21 that?

22 A. Yes.

23 Q. Okay. Do you --

24 MR. RHEINHART: Is it written, I'm sorry,
25 is it written to someone named Sarah or it

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1 appears to be a phone call from a person named
2 Sarah?

3 MR. KUVIN: From a person named Sarah.
4 Thank you.

5 BY MR. KUVIN:

6 Q. Did you call someone, anyone on October 1
7 of 2005 at 9:50 a.m., to confirm two people, one at
8 11:00 and one at 4:00 p.m.?

9 MR. RHEINHART: Instruct the witness not
10 to answer based on her Fifth Amendment
11 privilege against self-incrimination since this
12 document was seized from Mr. Epstein's home.

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

16 BY MR. KUVIN:

17 Q. Are you the Sarah that's referred to in
18 these phone messages that we've been looking at?

19 MR. RHEINHART: Instruct the witness not
20 to answer.

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

24 BY MR. KUVIN:

25 Q. Let's skip Page 12 and go to Page 13 of

33 (Pages 129 to 132)

Page 133

1 this same exhibit, if you would. Okay.

2 Is that your handwriting on Page 13
3 which happens to be a note stating "Johanna S. is
4 coming"?

5 MR. RHEINHART: Okay. Hold on. Can you
6 just show me what page you're looking at?

7 Okay. We skipped a page.

8 THE WITNESS: No.

9 BY MR. KUVIN:

10 Q. Okay. Do you recognize whose it is?

11 MR. RHEINHART: Let me talk to you again.

12 BY MR. KUVIN:

13 Q. If it's a yes, you might want to talk to
14 him; if it's a no, it might be quick.

15 A. No, no. Sorry.

16 Q. Let's look at Page 14, same exhibit. The
17 note on the right-hand side states, "The girl from
18 St. Bart's got sick so she won't be able to come.
19 Sarah got message from her." First of all, just
20 generally, do you see the note I'm referring to?

21 A. Yes.

22 Q. Okay. Do you know what that is talking
23 about?

24 A. No.

25 Q. Is that your handwriting?

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1 A. No.

2 Q. Did Mr. Epstein obtain girls under the age
3 of 16 from St. Bart's?

4 MR. RHEINHART: Instruct the witness not
5 to answer. Object to the form of the question
6 in that it presumes that she knows who
7 Mr. Epstein is.

8 THE WITNESS: On advice of counsel, I must
9 invoke my Fifth Amendment privilege.

10 BY MR. KUVIN:

11 Q. All right. Let's take a look at the next
12 page. Appears to be a note, phone message of -- I
13 can't read the date, 2005 to Jeffrey from
14 Melissa Hanes. Just generally, do you see what I'm
15 talking about so we're on the same page here?

16 A. Yes.

17 Q. Okay. Do you know who Melissa Hanes is?

18 A. On the advice of counsel, I wish to invoke my
19 Fifth Amendment right.

20 Q. All right. The note appears to say: She
21 called again, if she could work any time Monday
22 through Friday.

23 Do you know what that message
24 pertains to?

25 A. On advice of counsel, I wish to invoke my

Page 135

1 Fifth Amendment right.

2 BY MR. KUVIN:

3 Q. Are you aware that Jeffrey Epstein would
4 refer to "work" as performing naked massages for
5 him?

6 MR. RHEINHART: Object to the form of the
7 question. It's compound and I instruct the
8 witness not to answer.

9 THE WITNESS: On advice of counsel, I wish
10 to invoke my Fifth Amendment right.

11 BY MR. KUVIN:

12 Q. Let's take a look at the next page, Page
13 16. All right. If we look at not the message, the
14 phone message, but the note next to that it says:
15 Haley on Saturday with Sage at 10:30.

16 Do you know who Haley is as referred
17 to in this note?

18 A. On the advice of counsel, I must invoke my
19 Fifth Amendment right.

20 Q. Do you know who Sage is as referred to in
21 this note?

22 A. On the advice of counsel, I must invoke my
23 Fifth Amendment right.

24 MR. GARCIA: I haven't heard the counsel
25 give any advice.

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1 MR. RHEINHART: You don't know what we've
2 talked about outside of the room so...

3 MR. GARCIA: Just changing the procedure
4 is all?

5 MR. RHEINHART: I'm changing the procedure
6 for Mr. Kuvin.

7 MR. KUVIN: I'm all happy for speed.

8 BY MR. KUVIN:

9 Q. All right. Let's look at Page 17 of
10 Exhibit 4. It appears to be a phone message at the
11 bottom dated 9/1/05 to Jeffrey from Jean-Luc. Let
12 me ask this: Do you recognize the phone number
13 that's listed there of (646)286-7000?

14 MR. RHEINHART: Instruct the witness not
15 to answer based on her Fifth Amendment
16 privilege and self-incrimination.

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

19 MR. KUVIN: Let me show this one to the
20 camera if I could. If you could focus on the
21 bottom message for me.

22 THE VIDEOGRAPHER: I can't really read
23 that.

24 MR. KUVIN: Do I need to tilt it?

25 THE VIDEOGRAPHER: I think you need to

34 (Pages 133 to 136)

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bring the whole paper up closer.

MR. KUVIN: Towards you?

THE VIDEOGRAPHER: Yes, towards the lens.

MR. KUVIN: Just pass that up so we can get a good shot of the bottom message.

THE VIDEOGRAPHER: Up a little higher, please. Let it focus. That's good. Go out. Okay.

MR. KUVIN: All right. Thank you very much.

BY MR. KUVIN:

Q. The message appears to read: 9/1/2005 to Jeffrey, 8:08, Jean-Luc, telephone. He has a teacher for you to teach you how to speak Russian. She is two times eight years old, not blonde. Lessons are free and you can have first today if you call. Do you know what that message is referring to?

MR. RHEINHART: Instruct the witness not to answer the question. Object to the form of the question because in that it presumes she has knowledge of either Jeffrey or Jean-Luc or that phone number.

THE WITNESS: On the advice of counsel, I wish to invoke my Fifth Amendment right.

Do you -- first of all, do you see

that in front of you? Are we talking about the same thing here?

A. Yes.

Q. Okay. Do you know who "Haley" is referring to in this note?

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

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

BY MR. KUVIN:

Q. Does your handwriting appear anywhere on Page 19 here --

A. On the --

Q. -- on either note?

A. On the advice of my lawyer, I must invoke my Fifth Amendment privilege.

Q. Is that your handwriting on the left in the note that I just read that says: Haley, 11:00 a.m.?

MR. RHEINHART: Same instruction.

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

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BY MR. KUVIN:

Q. Would you agree with me that this message is a message from Jean-Luc, that he's providing a 16-year-old girl to Jeffrey Epstein?

MR. RHEINHART: Object to the form in that it calls for speculation and also assumes facts as to Mr. Jean-Luc and Mr. Epstein; therefore, I instruct her to invoke her Fifth Amendment privilege.

THE WITNESS: On the instruction from my lawyer, I must invoke my Fifth Amendment privilege.

BY MR. KUVIN:

Q. Skip the next page if you would, and the following page will be Page 19 of Exhibit 4. It should be two messages.

MR. RHEINHART: Show me what you're looking at.

MR. KUVIN: And the top left one says, "Friday."

MR. RHEINHART: Thank you.

BY MR. KUVIN:

Q. The message on the left-hand side that appears to be, have a date of 4/8/05 and a number 7 written on it. It says: Haley, 11:00 a.m.

privilege.

BY MR. KUVIN:

Q. All right. Let's take a look at the next page which is Page 20. Is that your handwriting on this paper?

MR. RHEINHART: Let me talk to her.

THE WITNESS: On the advice of my lawyer, I wish to invoke my Fifth Amendment privilege.

BY MR. KUVIN:

Q. Is this a list of girls that were being provided to Jeffrey Epstein for sex?

MR. RHEINHART: Objection to the form, the standing objection previously stated. I will instruct the witness not to answer that question.

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

BY MR. KUVIN:

Q. Did Jeffrey Epstein not like girls that had tattoos?

MR. RHEINHART: Objection to the form based on the standing objection and the same instruction.

THE WITNESS: On the instruction of my

35 (Pages 137 to 140)

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1 lawyer, I must invoke my Fifth Amendment
2 privilege.
3 BY MR. KUVIN:
4 Q. Did Jeffrey Epstein not like girls that
5 had blonde hair?
6 MR. RHEINHART: Standing objection and the
7 same instruction.
8 THE WITNESS: On the instruction of my
9 lawyer, I must invoke my Fifth Amendment
10 privilege.
11 BY MR. KUVIN:
12 Q. Take a look at the next page, if you
13 would. This one.
14 MR. RHEINHART: Thank you.
15 BY MR. KUVIN:
16 Q. Is that your handwriting?
17 A. On instruction of my lawyer, I must invoke my
18 Fifth Amendment privilege.
19 Q. Is this an additional -- on Page 21, is
20 this an additional list of girls that were being
21 provided to Jeffrey Epstein for sex?
22 MR. RHEINHART: I'm sorry. Did we change
23 to a different page or the same page?
24 MR. KUVIN: The same page.
25

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1 BY MR. KUVIN:
2 Q. Is this an additional list of girls that
3 were --
4 MR. RHEINHART: Thank you.
5 BY MR. KUVIN:
6 Q. -- being provided to Jeffrey Epstein for
7 sex?
8 MR. RHEINHART: Objection to the form.
9 The same objection and the same instruction.
10 THE WITNESS: On the instruction of my
11 lawyer, I must invoke my Fifth Amendment
12 privilege.
13 BY MR. KUVIN:
14 Q. Page 22. Note on the right appears to
15 say: Johanna has a friend, Andrea, that would like
16 to work tonight. Do you know who Johanna is refer,
17 referring to in that note?
18 MR. RHEINHART: Instruct the witness not
19 to answer based on the privilege against
20 self-incrimination.
21 THE WITNESS: On the advice of my lawyer,
22 I wish to assert my Fifth Amendment right.
23 BY MR. KUVIN:
24 Q. Do you know who Andrea is referring to in
25 that note?

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1 MR. RHEINHART: Same instruction.
2 THE WITNESS: On the advice of my lawyer,
3 I must choose to invoke my Fifth Amendment
4 right.
5 BY MR. KUVIN:
6 Q. Do you know who E.W. is?
7 MR. RHEINHART: Same instruction.
8 THE WITNESS: On the advice of my lawyer,
9 I wish to invoke my Fifth Amendment privilege.
10 BY MR. KUVIN:
11 Q. Do you know who L.M. is?
12 MR. RHEINHART: Let me consult for a
13 second.
14 MR. KUVIN: Yep.
15 (A discussion was held off the record.)
16 MR. RHEINHART: Mr. Kuvin, I'm just asking
17 you to clarify. Are you asking if she's ever
18 heard the name of these people or whether she's
19 actually ever met someone she knows to have
20 that name?
21 MR. KUVIN: Second part, whether she knows
22 someone personally by that name. I don't want
23 to know what somebody may have told her.
24 MR. RHEINHART: Sure.
25 MR. KUVIN: Certainly not attorneys or

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1 anything like that. I want to know whether she
2 has any personal knowledge of someone by the
3 name of L.M.
4 MR. RHEINHART: Okay. Based on our
5 conversation, she can answer or not answer the
6 question.
7 THE WITNESS: On the advice of my lawyer,
8 I choose to invoke my Fifth Amendment right.
9 MR. KUVIN: Okay. It's like a
10 cough/sneeze.
11 MR. GARCIA: I tried to stifle it, but --
12 MR. GOLDBERGER: You got it all over me.
13 Just kidding.
14 MR. GARCIA: You don't want to get this.
15 I've had it for a couple of days.
16 MR. KUVIN: What number are we on? 13.
17 That's why I always leave some with numbers
18 still on there to show the picture to the
19 camera.
20 Exhibit 13 will be pursuant to
21 confidentiality and the identities of the
22 girls involved in this case.
23 MR. RHEINHART: As I presume the prior
24 questions were as well.
25 MR. KUVIN: Yes. Absolutely. This is

36 (Pages 141 to 144)

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1 different because it's an exhibit.
2 MR. RHEINHART: Agreed.
3 MR. KUVIN: Okay.
4 (Plaintiff's Exhibit No. 13 was marked for
5 identification.)
6 MR. RHEINHART: We're moving off of
7 Exhibit 12?
8 MR. KUVIN: Yes.
9 MR. RHEINHART: I was looking at the next
10 exhibit.
11 MR. KUVIN: We're done with the trash.
12 MR. RHEINHART: Okay.
13 BY MR. KUVIN:
14 Q. Just take a look at Exhibit 13. Do you
15 recognize the girl in that photograph?
16 A. On the advice of my lawyer, I must choose to
17 exercise my Fifth Amendment privilege.
18 Q. Do you agree with me that that girl shown
19 in that photograph is B.B.?
20 MR. RHEINHART: Objection to the form for
21 the reasons previously stated, causes her to
22 speculate, and I instruct her not to answer
23 based on her Fifth Amendment privilege.
24 THE WITNESS: On the advice of my lawyer,
25 I must choose to exercise my Fifth Amendment

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1 privilege.
2 BY MR. KUVIN:
3 Q. Do you agree with me that you arranged to
4 have the girl shown in Exhibit 13 be brought to
5 Mr. Epstein's home for sex with Mr. Epstein?
6 MR. RHEINHART: Objection to the form as
7 compound, and also the standing objection, and
8 instruct the witness not to answer.
9 THE WITNESS: On the advice of my lawyer,
10 I must choose to exercise my Fifth Amendment
11 privilege.
12 BY MR. KUVIN:
13 Q. Would you agree with me that the girl
14 shown in Exhibit 13 did, in fact, come to
15 Mr. Epstein's home in 2005?
16 MR. RHEINHART: Same objection previously
17 stated. It's compound as to the date, place,
18 person, and also presumes knowledge of
19 Mr. Epstein, so I would instruct her not to
20 answer.
21 THE WITNESS: On the advice of my lawyer,
22 I must choose to exercise my Fifth Amendment
23 privilege.
24 BY MR. KUVIN:
25 Q. Do you agree with me that the girl shown

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1 in Exhibit 13 came to Mr. Epstein's home when she
2 was only 15 years old?
3 MR. RHEINHART: Objection to the form
4 based on the standing objection, also
5 speculation as to any age and instruct the
6 witness not to answer.
7 THE WITNESS: On the advice of my lawyer,
8 I must choose to exercise my Fifth Amendment
9 right.
10 BY MR. KUVIN:
11 Q. Do you agree with me that when you
12 arranged to have this girl come to Mr. Epstein's
13 home, that you were aware that she was 15 years old?
14 MR. RHEINHART: Objection to the form. It
15 is compound. It assumes facts that are not
16 admitted by this witness, and it's ambiguous in
17 that regard, and therefore I instruct her not
18 to answer.
19 THE WITNESS: On the advice of my lawyer,
20 I must choose to exercise my Fifth Amendment
21 right.
22 BY MR. KUVIN:
23 Q. Do you agree that when this girl was
24 brought to Mr. Epstein's home, that she performed a
25 massage on Mr. Epstein while he was naked?

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1 MR. RHEINHART: Objection to the form,
2 standing objection. The question assumes that
3 this witness has any knowledge of
4 Jeffrey Epstein or whether this person ever
5 came to Mr. Epstein's home. It is therefore
6 ambiguous, and I instruct her not to answer.
7 THE WITNESS: On the instruction of my
8 lawyer, I must choose to exercise my Fifth
9 Amendment right.
10 BY MR. KUVIN:
11 Q. Do you agree with me that this girl shown
12 in Exhibit 13 was 15 years old at the time she was
13 asked by Jeffrey Epstein to remove her clothes?
14 MR. RHEINHART: Objection to the form. It
15 requires speculation and assumes facts relating
16 to Mr. Epstein and events that may have
17 occurred which this witness has no knowledge
18 and has not admitted any knowledge. And I
19 instruct her not to answer.
20 THE WITNESS: On advice of counsel I must
21 choose to exercise my Fifth Amendment right.
22 BY MR. KUVIN:
23 Q. Do you agree that you described for the
24 girl as shown in Exhibit 13 -- by the way, her name
25 is B.B. -- that you described to B.B. how to set up

37 (Pages 145 to 148)

Page 149

1 the massage table in Jeffrey Epstein's bathroom?

2 MR. RHEINHART: Objection to the form for
3 the reasons previously stated, and instruct the
4 witness not to answer.

5 THE WITNESS: On the advice of counsel, I
6 must choose to exercise my Fifth Amendment
7 right.

8 BY MR. KUVIN:

9 Q. Do you agree that you showed B.B. where
10 the massage oils are kept in Jeffrey Epstein's
11 bathroom in his home?

12 MR. RHEINHART: Objection to the form in
13 that it assumes knowledge of Jeffrey Epstein,
14 knowledge that this person was ever at
15 Jeffrey Epstein's home none of which is
16 admitted or acknowledged by this witness, and
17 instruct the witness not to answer.

18 THE WITNESS: On advice of counsel I must
19 choose to invoke my Fifth Amendment right.

20 BY MR. KUVIN:

21 Q. Do you agree that you showed B.B., as
22 shown in Exhibit 13, where Mr. Epstein kept the
23 vibrators in his bathroom at his house?

24 MR. RHEINHART: Same objection as stated
25 to the previous question as to the form of the

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1 question, and instruct the witness not to
2 answer.

3 THE WITNESS: On advice of counsel, I must
4 choose to exercise my Fifth Amendment right.

5 BY MR. KUVIN:

6 Q. Do you agree with me that in 2005 you
7 knowingly provided B.B., a 15-year-old girl, to
8 Mr. Epstein so that he could sexually abuse her?

9 MR. RHEINHART: Objection to the form as
10 to it calling for a legal conclusion as to
11 assuming multiple facts, since therefore
12 compound and instruct the witness not to
13 answer.

14 THE WITNESS: On advice of counsel, I must
15 choose to invoke my Fifth Amendment right.

16 BY MR. KUVIN:

17 Q. Do you agree with me that B.B. was given
18 to Mr. Epstein to perform a naked massage of him
19 while he touched B.B.?

20 MR. RHEINHART: Objection to the form.
21 Standing objection and other facts that are
22 assumed in the question to which this witness
23 does not admit, and therefore the witness is
24 instructed not to answer the question.

25 THE WITNESS: On the instruction of my

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1 counsel, I must choose to invoke my Fifth
2 Amendment right.

3 BY MR. KUVIN:

4 Q. Do you agree with me that during the
5 massage that B.B. was forced to give to Mr. Epstein,
6 that he touched her between her legs?

7 MR. RHEINHART: Objection to the form. It
8 is ambiguous including the term "forced." It
9 assumes facts that this witness has not
10 admitted or that this witness has not
11 acknowledged any personal knowledge and
12 instruct her not to answer.

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

16 BY MR. KUVIN:

17 Q. Do you agree with me that Mr. Epstein
18 touched B.B. between her legs?

19 MR. RHEINHART: Objection to the form and
20 the question presumes knowledge of
21 Jeffrey Epstein. Instruct the witness not to
22 answer.

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

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1 BY MR. KUVIN:

2 Q. Do you agree with me that B.B. told
3 Mr. Epstein to stop touching him there -- touching
4 her there?

5 MR. RHEINHART: Same objection previously
6 stated to the last question and instruct the
7 witness not to answer.

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

10 BY MR. KUVIN:

11 Q. Do you agree with me that you have
12 personal knowledge that after telling Mr. Epstein to
13 stop touching her between her legs, Mr. Epstein
14 apologized and then touched her again between her
15 legs?

16 MR. RHEINHART: Objection to the form and
17 the standing objection previously stated as
18 well as the question is compound and instruct,
19 and ambiguous, and I instruct the witness not
20 to answer.

21 THE WITNESS: On the instruction of my
22 lawyer, I must choose to exercise my Fifth
23 Amendment right.

24 BY MR. KUVIN:

25 Q. Do you agree with me that Mr. Epstein

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1 specifically targeted young underage girls that were
2 economically disadvantaged for his own sexual
3 pleasure?

4 MR. RHEINHART: Objection to the form.
5 Several of the terms are ambiguous and it
6 assumes knowledge of Mr. Epstein and his
7 habits, and therefore, I instruct the witness
8 not to answer the question.

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

12 BY MR. KUVIN:

13 Q. Do you agree with me that Mr. Epstein
14 would pay these girls 2 to \$300 for this sexual
15 massage?

16 MR. RHEINHART: Objection to the form.
17 Standing objection and assumes knowledge of
18 Mr. Epstein and his practices, so therefore, I
19 instruct the witness not to answer.

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

23 BY MR. KUVIN:

24 Q. Do you agree with me that you handed B.B.
25 \$200?

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1 Mr. Epstein naked massages?

2 MR. RHEINHART: Object to the form. It's
3 multiple layers of compound questioning,
4 includes terms like "enterprise" that are
5 ambiguous and may call for a legal conclusion
6 that this witness is not competent to give. I
7 instruct the witness not to answer.

8 THE WITNESS: On the instruction of my
9 lawyer, I must choose to exercise my Fifth
10 Amendment right.

11 BY MR. KUVIN:

12 Q. Do you agree with me that there is a
13 staircase leading out of Mr. Epstein's kitchen in
14 his home on Palm Beach?

15 MR. RHEINHART: Objection to the form,
16 presumes knowledge of Mr. Epstein or his home
17 on Palm Beach. Instruct the witness not to
18 answer.

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

22 BY MR. KUVIN:

23 Q. Do you agree with me that when B.B. was
24 brought to Mr. Epstein's bathroom, that he walked
25 out of the shower wearing a towel?

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1 MR. RHEINHART: Objection to the form,
2 instruct the witness not to answer.

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

6 BY MR. KUVIN:

7 Q. And just so we're clear, do you agree with
8 me that you handed B.B. in 2005, \$200 after she was
9 in the bathroom with Mr. Epstein at his home?

10 MR. RHEINHART: Objection to the form.
11 The question presumes knowledge of a person by
12 the name of B.B., therefore I instruct the
13 witness not to answer the question.

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

17 BY MR. KUVIN:

18 Q. Do you agree with me that Mr. Epstein had
19 a plan -- let me rephrase that.

20 Do you agree with me that Mr. Epstein
21 had an enterprise, a sexual enterprise, established
22 by which young girls would be brought to his home,
23 introduced to you, where you would then set up a
24 massage table, show them where the oils were, and
25 have these young girls under the age of 18, give

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1 MR. RHEINHART: Objection to the form in
2 that it presumes knowledge of B.B., that Ms.
3 B.B. was ever at Mr. Epstein's home, that this
4 witness knows anything about Mr. Epstein or his
5 home; therefore, the question is compound and
6 ambiguous, and I instruct her not to answer.

7 THE WITNESS: On the instruction of my
8 lawyer, I must choose to assert my Fifth
9 Amendment right.

10 BY MR. KUVIN:

11 Q. Do you know C.L.?

12 A. On the instruction of my lawyer, I must choose
13 to assert my Fifth Amendment privilege.

14 Q. Did you have C.L. -- excuse me, strike
15 that. Did you tell C.L. to come over to
16 Mr. Epstein's home to give Mr. Epstein a massage?

17 MR. RHEINHART: Objection to the form.
18 It's compound. Stand objection, standing
19 objection, sorry. Instruct the witness not to
20 answer.

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

24 BY MR. KUVIN:

25 Q. Did you introduce C.L. to Jeffrey Epstein?

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MR. RHEINHART: Objection to the form, standing objection. Instruct the witness not to answer.

THE WITNESS: On the instruction from my lawyer, I must choose to invoke my Fifth Amendment right.

BY MR. KUVIN:

Q. Do you agree with me that Mr. Epstein threatened C.L. with physical violence?

MR. RHEINHART: Objection to the form, the standing objection, as well as ambiguous as to the term "threaten." Instruct the witness not to answer.

THE WITNESS: Upon instruction from my lawyer, I must choose to invoke my Fifth Amendment right.

BY MR. KUVIN:

Q. Do you agree with me that Jeffrey Epstein told C.L. that if she talks to anyone about what had occurred at his home, bad things would happen to her?

MR. RHEINHART: Objection to the form, it's compound, and a standing objection. Also assumes numerous other facts that this witness has not acknowledge nor admitted, and therefore

BY MR. KUVIN:

Q. Would you agree with see that you visited a man by the name of Jeffrey Epstein while he was in jail in Palm Beach County?

MR. RHEINHART: Objection to the form, standing objection. Assumes other facts that this witness has not acknowledged, and instruct her not to answer.

THE WITNESS: Upon instruction from the lawyer, I must choose to invoke my Fifth Amendment right.

BY MR. KUVIN:

Q. Do you agree that you arranged to have C.L. come to Jeffrey Epstein's home for a nude massage?

MR. RHEINHART: Objection to the form, standing objection previously stated.

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

BY MR. KUVIN:

Q. Do you agree that C.L. has been to 358 El Brillo Way on at least two occasions?

MR. RHEINHART: Objection to the form. It assumes knowledge of C.L. and of 358 El Brillo

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I instruct her not to answer.

THE WITNESS: On the instruction from my lawyer, I must choose to invoke my Fifth Amendment privilege.

BY MR. KUVIN:

Q. Would you agree with me that in 2005 that Jeffrey Epstein was between the ages of 45 and 55 years old?

MR. RHEINHART: Objection to the form. Standing objection as to any knowledge of Jeffrey Epstein. Instruct the witness not to answer.

THE WITNESS: The instruction of my lawyer, I must choose to assert my Fifth Amendment right.

BY MR. KUVIN:

Q. Would you agree with me that Jeffrey Epstein has tremendous wealth?

MR. RHEINHART: Objection to the form as stated in the previous question, and instruct the witness not to answer.

THE WITNESS: On the instruction from the lawyer, I must choose to invoke my Fifth Amendment right.

Way, to which the witness has not acknowledged, and instruct the witness not to answer.

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

BY MR. KUVIN:

Q. Do you agree that Mr. Epstein has an odd-shaped penis?

MR. RHEINHART: Objection to the form of the question. It assumes knowledge of Mr. Epstein. It assumes knowledge of Mr. Epstein's body parts, and instruct the witness not to answer.

THE WITNESS: On advice -- on the instruction of my lawyer, I must choose to invoke my Fifth Amendment right.

BY MR. KUVIN:

Q. Have you seen Jeffrey Epstein's penis?

MR. RHEINHART: Objection to the form, and we're getting awfully close to a line here, Mr. Kuvin.

MR. KUVIN: I think the identity of something that young 14 and 15-year-old girls have seen is directly relevant to the issues in this case. If they can describe it, then

40 (Pages 157 to 160)

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1 obviously it's important because they are the
2 only ones that are answering questions in this
3 case.

4 MR. RHEINHART: Well, people have rights.
5 People will assert their rights, and I am just
6 telling you, we're getting close to a line
7 here.

8 MR. KUVIN: I think I'm being
9 respectful --

10 MR. RHEINHART: You haven't crossed it yet
11 because I'm still here, but I'm just warning
12 you.

13 Instruct the witness not to answer
14 any question that presumes existence or
15 any knowledge of Jeffrey Epstein or any of
16 his body parts.

17 MR. KUVIN: Okay.

18 THE WITNESS: On the instruction of my
19 lawyer, I must choose to assert my Fifth
20 Amendment right.

21 BY MR. KUVIN:

22 Q. Do you know whether or not Mr. Epstein has
23 any identifying characteristics to any of his
24 private genitalia?

25 MR. RHEINHART: Objection to the form for

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1 MR. KUVIN: The Epstein matter.

2 MR. RHEINHART: I instruct the witness not
3 to answer. Objection to the form as compound
4 and assumes the existence of Mr. Epstein which,
5 again, we are not acknowledging, and therefore
6 am instructing her not to answer.

7 THE WITNESS: On the instruction of my
8 lawyer, I choose to assert my Fifth Amendment
9 right.

10 BY MR. KUVIN:

11 Q. Are you aware that Mr. Epstein negotiated
12 for your immunity from prosecution in the
13 non-prosecution agreement that was entered into with
14 the United States Attorney's Office for the Southern
15 District of Florida?

16 MR. RHEINHART: Again, objection to the
17 form for the reasons previously stated as to
18 the standing objection and instruct her not to
19 answer.

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

23 BY MR. KUVIN:

24 Q. Do you agree with me that B.B. was
25 emotionally traumatized as a result of the incidents

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1 the reason previously stated, because it
2 presumes that she has any knowledge of who
3 Jeffrey Epstein is or what his body parts look
4 like, and I would instruct her not to answer.

5 THE WITNESS: On the instruction of my
6 lawyer, I must choose to assert my Fifth
7 Amendment right.

8 BY MR. KUVIN:

9 Q. Have you heard anyone other than your
10 lawyers that have described what any of
11 Mr. Epstein's body parts look like?

12 MR. RHEINHART: Objection to the form. It
13 is irrelevant what she's heard from other
14 people, and again, it presumes facts that she's
15 not acknowledged. It is compound, and it is
16 harassing at this point.

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

20 BY MR. KUVIN:

21 Q. Were you consulted with respect to the
22 non-prosecution agreement that was entered into with
23 the United States Attorney's Office for the Southern
24 District of Florida as it relates to this case?

25 MR. RHEINHART: Which case?

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1 that occurred Jeffrey Epstein's home in 2005?

2 MR. RHEINHART: Objection to the form. It
3 assumes any knowledge of B.B. or any incidents
4 that would have occurred at a home purporting
5 to belong to a person by the name of Jeffrey
6 Epstein, and instruct her not to answer.

7 THE WITNESS: Upon instruction from my
8 lawyer, I must choose to invoke my Fifth
9 Amendment right.

10 BY MR. KUVIN:

11 Q. Do you agree with me that C.L. was
12 emotionally traumatized as a result of the incidents
13 that occurred at Jeffrey Epstein's home?

14 MR. RHEINHART: Same objection as to the
15 previous question, and instruct the witness not
16 to answer.

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

20 BY MR. KUVIN:

21 Q. Do you know Jane Doe No. 102?

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

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

41 (Pages 161 to 164)

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1 right.
 2 BY MR. KUVIN:
 3 Q. Have you known Jeffrey Epstein to keep
 4 underage, under the age of 18, sex slaves?
 5 MR. RHEINHART: Objection to the form both
 6 as to ambiguity as to what you mean by "sex
 7 slaves," and "keep," also the standing
 8 objection as to any knowledge of Mr. Epstein
 9 and instruct the witness not to answer.
 10 THE WITNESS: On the instruction of my
 11 lawyer, I must choose to invoke my Fifth
 12 Amendment right.
 13 BY MR. KUVIN:
 14 Q. Where do most of the models come from that
 15 are part of MC Squared Modeling Agency?
 16 MR. RHEINHART: Objection to the form. It
 17 assumes knowledge of an entity by the name of
 18 MC Squared Modeling which the witness has not
 19 acknowledged and therefore I instruct her not
 20 to answer, and the question is compound.
 21 THE WITNESS: On the instruction of my
 22 lawyer, I must choose to invoke my Fifth
 23 Amendment privilege.
 24 BY MR. KUVIN:
 25 Q. Who gets visas for the models at MC

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1 Squared, if you know?
 2 MR. RHEINHART: Same, same objection as to
 3 the previous question, same instruction.
 4 THE WITNESS: On the instruction of my
 5 lawyer, I must choose to invoke my Fifth
 6 Amendment right.
 7 BY MR. KUVIN:
 8 Q. Do you work with Jeffrey Epstein to get
 9 visas for out-of-the-country models or models that
 10 are -- strike that.
 11 Do you work with Jeffrey Epstein to
 12 get visas for girls that are underage and bring them
 13 into the United States so that they can work as
 14 models for MC Squared?
 15 MR. RHEINHART: Objection to the form and
 16 assumes knowledge as to Mr. Epstein and as to
 17 MC Squared and other matters that are not
 18 admitted or acknowledged by this witness. The
 19 question is compound. I would instruct her not
 20 to answer.
 21 THE WITNESS: On the instruction from my
 22 lawyer, I must choose to invoke my Fifth
 23 Amendment right.
 24 BY MR. KUVIN:
 25 Q. Do you know who owns 301 East 66th Street

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1 in New York?
 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 choose to invoke my Fifth Amendment
 7 right.
 8 BY MR. KUVIN:
 9 Q. Are you aware that various underage girls
 10 brought in from out of the country live at 301 East
 11 66th Street?
 12 MR. RHEINHART: Objection to the form.
 13 It's compound, and instruct the witness not to
 14 answer.
 15 THE WITNESS: On the instruction from my
 16 lawyer, I must choose to invoke my Fifth
 17 Amendment right.
 18 BY MR. KUVIN:
 19 Q. You've stayed at that address before, have
 20 you not?
 21 MR. RHEINHART: Instruct the witness not
 22 to answer.
 23 THE WITNESS: On the instruction of my
 24 lawyer, I must choose to invoke my Fifth
 25 Amendment right.

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1 BY MR. KUVIN:
 2 Q. You've stayed there hundreds of times,
 3 have you, hundreds of times have you not?
 4 MR. RHEINHART: Instruct the witness not
 5 to answer.
 6 THE WITNESS: On instruction from my
 7 lawyer, I must choose to invoke my Fifth
 8 Amendment right.
 9 BY MR. KUVIN:
 10 Q. Are you aware that Mr. Epstein obtains
 11 visas for girls from out of the country to work as
 12 models and then prostitutes them out?
 13 MR. RHEINHART: Objection to the form of
 14 the question in that it is ambiguous and it
 15 assumes numerous facts that have not
 16 acknowledged that this witness has any
 17 knowledge of, and the term "prostitutes them
 18 out" is ambiguous, so I would instruct her not
 19 to answer the question.
 20 THE WITNESS: On the instruction of my
 21 lawyer, I must choose to invoke my Fifth
 22 Amendment right.
 23 BY MR. KUVIN:
 24 Q. You know what Radar Online is, do you not?
 25 MR. RHEINHART: Instruct the witness not

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

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

6 BY MR. KUVIN:

7 Q. In fact, you were around when
8 Jeffrey Epstein bought Radar Online, were you not?

9 MR. RHEINHART: Objection to the form,
10 standing objection as to any knowledge of
11 Jeffrey Epstein or of Radar Online, and
12 instruct the witness not to answer.

13 THE WITNESS: On the instruction from my
14 lawyer, I must choose to invoke my Fifth
15 Amendment right.

16 BY MR. KUVIN:

17 Q. Are you aware that Jeffrey Epstein
18 accessed or obtained underage girls through his
19 Radar connection?

20 MR. RHEINHART: Same objection as
21 previously stated to the last question and same
22 instruction.

23 THE WITNESS: On the instruction from my
24 lawyer, I must choose to invoke my Fifth
25 Amendment privilege.

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

4 BY MR. KUVIN:

5 Q. Would you agree with me that Jeffrey
6 Epstein has a list of underage girls that live
7 within a close proximity to all of his different
8 homes in every different state?

9 MR. RHEINHART: Objection to the form in
10 that it assumes Mr. Epstein has homes in every
11 single state and that she knows who Mr. Epstein
12 is, and therefore I instruct her not to answer.

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

15 BY MR. KUVIN:

16 Q. You're aware Mr. Epstein has a home in New
17 York, right?

18 MR. RHEINHART: Instruct the witness not
19 to answer, and standing objection of knowledge
20 of Mr. Epstein.

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

23 BY MR. KUVIN:

24 Q. Are you aware that he has a home in New
25 Mexico?

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1 BY MR. KUVIN:

2 Q. How many different properties does
3 Jeffrey Epstein own?

4 MR. RHEINHART: Objection to the form,
5 standing objection. Instruct the witness not
6 to answer.

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

10 BY MR. KUVIN:

11 Q. You've been to all of Jeffrey Epstein's
12 home, have you not?

13 MR. RHEINHART: Same objection as
14 previously stated to the last question. Same
15 instruction.

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

18 BY MR. KUVIN:

19 Q. You agree with me that Jeffrey Epstein
20 keeps a list of girls in the nearby areas around all
21 of his homes and properties?

22 MR. RHEINHART: Objection to the form, for
23 the standing objection as well as ambiguous as
24 to "nearby," and "all of his properties," so I
25 instruct the witness not to answer.

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1 MR. RHEINHART: By he, you mean
2 Mr. Epstein?

3 MR. KUVIN: Yeah.

4 MR. RHEINHART: Got to make sure the
5 question is clear.

6 MR. KUVIN: Yes.

7 MR. RHEINHART: Standing objection to the
8 form and instruct the witness not to answer.

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

12 BY MR. KUVIN:

13 Q. Are you aware he has a home in the U.S.
14 Virgin Islands?

15 MR. RHEINHART: Same instruction, same
16 objection.

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

20 BY MR. KUVIN:

21 Q. And isn't it true that you kept a list of
22 underage girls that could service, in other words,
23 give Mr. Epstein naked massages in every place that
24 he has one of those homes I just described?

25 MR. RHEINHART: Same objection as

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1 previously stated, the standing objection and
2 instruct her not to answer.

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

6 BY MR. KUVIN:

7 Q. Now, you're also aware, are you not, that
8 Jeffrey Epstein would pay other girls to bring
9 additional underage girls to him for naked massages,
10 are you not?

11 MR. RHEINHART: Standing objection and
12 instruct the witness not to answer.

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

16 BY MR. KUVIN:

17 Q. And, in fact, you frequently would pay
18 other girls to bring additional girls under the age
19 of 18 to Mr. Epstein for naked massages?

20 MR. RHEINHART: Objection to the form,
21 standing objection as to Mr. Epstein, also as
22 to any knowledge of any naked massages by
23 anybody to anybody. Instruct the witness not
24 to answer.

25 THE WITNESS: On the instruction of my

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1 to Mr. Epstein's house on Palm Beach, you were aware
2 that they were brought so that Mr. Epstein could
3 molest them, correct?

4 MR. RHEINHART: Objection to the form as
5 to knowledge of Mr. Epstein, as to knowledge of
6 any home on Palm Beach, and ambiguous as to the
7 term "molest," and instruct the witness not to
8 answer.

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

12 BY MR. KUVIN:

13 Q. You're aware that Mr. Epstein raped
14 several underage minors in his bedroom?

15 MR. RHEINHART: Objection to the form as
16 to knowledge of Mr. Epstein, and also ambiguous
17 as to the term "rape."

18 THE WITNESS: On the instruction of my
19 lawyer, I must choose to invoke my Fifth
20 Amendment rights.

21 BY MR. KUVIN:

22 Q. Do you know what the term "rape" means?

23 MR. RHEINHART: Not as you used it. If
24 you want to tell us what you mean by when you
25 used it, we'll be happy to answer --

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1 lawyer, I choose to invoke my Fifth Amendment
2 right.

3 BY MR. KUVIN:

4 Q. And there was a complete list of girls,
5 underage girls, that was stored on Mr. Epstein's
6 computer system; isn't that true?

7 MR. RHEINHART: Objection to the form.
8 It's ambiguous as to what a complete list is,
9 and also a standing objection to any knowledge
10 of Mr. Epstein, and instruct the witness not to
11 answer.

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

15 BY MR. KUVIN:

16 Q. In fact, you've seen the list of underage
17 girls that exists on Mr. Epstein's computer, have
18 you not?

19 MR. RHEINHART: Objection to the form,
20 standing objection.

21 THE WITNESS: On the instruction from my
22 lawyer, I must choose to invoke my Fifth
23 Amendment right.

24 BY MR. KUVIN:

25 Q. When underage minor females were brought

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1 MR. KUVIN: I want to know if --

2 MR. RHEINHART: -- or evaluate your
3 question.

4 MR. KUVIN: I want to know if she has her
5 own definition of what the phrase or word
6 "rape" means, so that we can use her definition
7 of that word. I want to make sure it's
8 completely unambiguous.

9 MR. RHEINHART: Your asking the question.
10 If you want to define the term, she'll respond
11 to your question.

12 BY MR. KUVIN:

13 Q. Do you what the term or word "rape" means?

14 A. Yes.

15 Q. Okay. What is your understanding of that
16 word?

17 MR. RHEINHART: Now, we're not answering
18 that question. It's your term. It's your
19 question. If you want to define it, you can go
20 ahead and define it.

21 MR. KUVIN: Well, I beg --

22 MR. RHEINHART: If you want to give her
23 specifics as to what she -- you can define it.

24 MR. KUVIN: I beg to differ with you, and
25 I don't know that that's a proper objection.

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1 I'm asking her her understanding of the word.

2 MR. RHEINHART: And I am instructing her
3 not to answer it because that question is not
4 likely to lead to discoverable evidence. It's
5 simply meant to harass her. And you can define
6 the term in your question.

7 MR. KUVIN: Well, with all due respect,
8 it's certainly not to harass if there have been
9 girls that were alleging that they were raped.

10 MR. RHEINHART: Well, you define what you
11 mean by when you say that they allege that they
12 have been raped, and she will be happy to
13 evaluate your question.

14 MR. KUVIN: And that's what I'm trying to
15 understand.

16 MR. RHEINHART: She's not going to
17 speculate on what you mean when you frame a
18 word in your question.

19 MR. KUVIN: That's exactly what I'm trying
20 to do. I'm trying to make sure that we are
21 using the same definition, so I would like to
22 use her definition of the word.

23 MR. RHEINHART: Right. She's not going to
24 answer it, so you can either move on we can
25 stop.

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1 MR. KUVIN: Okay. So you're instructing
2 her not to answer the question?

3 MR. RHEINHART: I am instructing her not
4 to answer the question for the third time.

5 MR. KUVIN: Okay. I just want to be
6 clear.

7 MR. GARCIA: What's the legal objection?

8 MR. RHEINHART: I've already stated what
9 my legal objection is. It's meant solely for
10 harassment. It's not likely to lead to
11 discoverable evidence.

12 BY MR. KUVIN:

13 Q. Okay. For the purpose of my question, I
14 would like to, because your attorney won't allow you
15 to define the word "rape," I would like you to use
16 the word and understand the word "rape" to mean
17 sexual contact with an individual, including
18 sexual -- well, let me clarify here. Hang on. You
19 know what, if we're going to do it, let's do it
20 right since we can't use your definition.

21 MR. RHEINHART: You can use whatever
22 definition you like, but you need to tell me
23 what it is.

24 MR. KUVIN: Let's use the definition of
25 "rape" as defined by Florida law as oral, anal

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1 or vaginal penetration or union with the sexual
2 organ of another, or oral, anal or vaginal
3 penetration of another with any other object,
4 or with any object. Excuse me. All right?

5 MR. RHEINHART: Okay.

6 BY MR. KUVIN:

7 Q. Do you understand that definition as I
8 have explained it to you, or would you like me to
9 read it again?

10 A. Read it again, please.

11 Q. Absolutely. Florida law defines "rape" as
12 oral, anal or vaginal penetration by, or union with
13 the sexual organ of another; or oral, anal or
14 vaginal penetration by another with any object. And
15 obviously that is without the other's consent.

16 A. You did not say that.

17 MR. RHEINHART: Okay.

18 BY MR. KUVIN:

19 Q. Adding without the other's consent,
20 obviously, to that definition.

21 Now, let's use that definition for
22 "rape," because that's as it's defined by Florida
23 law. Using that definition, are you aware, as you
24 sit here today, that Jeffrey Epstein has raped
25 underage girls?

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1 MR. RHEINHART: Standing objection to the
2 form of the question, and I would instruct the
3 witness not to answer.

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

7 BY MR. KUVIN:

8 Q. Are you aware as you sit here today that
9 Jeffrey Epstein raped B.B.?

10 MR. RHEINHART: Objection to the form.
11 The question assumes that he did, or that she
12 has any knowledge of whether he did, so I
13 instruct the witness not to answer.

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

17 BY MR. KUVIN:

18 Q. Are you aware as you sit here today, that
19 Jeffrey Epstein -- well, let me rephrase that.

20 You are aware, are you not, as you
21 sit here today, that Jeffrey Epstein raped C.L.?

22 MR. RHEINHART: Objection to the form as
23 leading, and also again assumes -- your
24 question assumes that she knows things that
25 she's not acknowledged that she knows or

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1 doesn't know, and I instruct her not to answer.

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

5 BY MR. KUVIN:

6 Q. Do you agree that Jeffrey Epstein has
7 raped hundreds of girls under the age of 18?

8 MR. RHEINHART: Objection to the form,
9 standing objection as to any knowledge of
10 Jeffrey Epstein. Instruct the witness not to
11 answer.

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

15 BY MR. KUVIN:

16 Q. You're aware, are you not, that
17 Jeffrey Epstein has raped hundreds of girls under
18 the age of 17?

19 MR. RHEINHART: Objection to the form as
20 leading. Instruct the witness not to answer
21 for the reasons previously stated to the last
22 the question.

23 THE WITNESS: On the instruction of my
24 lawyer, I must choose to assert my Fifth
25 Amendment right.

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1 BY MR. KUVIN:

2 Q. You're aware, as you sit here today, are
3 you not, that Jeffrey Epstein has raped hundreds of
4 girls under the age of 16?

5 MR. RHEINHART: Objection to the form.
6 Standing objection. It assumes numerous facts
7 mixed in a compound question, and therefore I
8 instruct the witness not to answer.

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

12 BY MR. KUVIN:

13 Q. Isn't it true that Mr. Epstein had at
14 least one or two scheduled appointments for sex with
15 underage girls every day while he was here in Palm
16 Beach County in the year 2005?

17 MR. RHEINHART: Objection to the form.
18 It's compound, standing objection as well, and
19 instruct the witness not to answer.

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

23 BY MR. KUVIN:

24 Q. Did you actually locate underage girls in
25 Palm Beach for Jeffrey Epstein to rape?

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1 MR. RHEINHART: Same objection as
2 previously stated as to ambiguity and compound,
3 and instruct the witness not to answer.

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

7 BY MR. KUVIN:

8 Q. Have you ever had sexual contact in any
9 manner with any underage girls that were brought to
10 Mr. Epstein's home?

11 MR. RHEINHART: Objection to the form.
12 Standing objection, compound, instruct the
13 witness not to answer.

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

17 BY MR. KUVIN:

18 Q. Did you keep an appointment book for
19 Mr. Epstein?

20 MR. RHEINHART: Objection to the form,
21 standing objection. Instruct the witness not
22 to answer.

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

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1 BY MR. KUVIN:

2 Q. Did you preserve a document that shows the
3 appointments kept for Mr. Epstein in the years 2004?

4 MR. RHEINHART: Objection to the form, the
5 standing objection, compound question and
6 instruct the witness not to answer.

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

10 BY MR. KUVIN:

11 Q. Same question with respect to any
12 appointments kept for Mr. Epstein in 2005.

13 MR. RHEINHART: Same objection previously
14 stated to the previous question.

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

18 BY MR. KUVIN:

19 Q. Same with respect to any appointments kept
20 for Mr. Epstein in 2006.

21 MR. RHEINHART: Same objection as
22 previously stated to the last two questions.

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

46 (Pages 181 to 184)

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1 BY MR. KUVIN:

2 Q. Have you provided any appointment books to
3 anyone with respect to appointments for Mr. Epstein?

4 MR. RHEINHART: Same standing objection as
5 to knowledge of Mr. Epstein. The question is
6 compound and instruct the witness not to
7 answer.

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

11 BY MR. KUVIN:

12 Q. Would Ep -- Mr. Epstein pay the underage
13 girls more money if they took off both their tops
14 and their bottoms?

15 MR. RHEINHART: Objection to the form,
16 standing objection. Instruct the witness not
17 to answer.

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

21 BY MR. KUVIN:

22 Q. Would Mr. Epstein pay the underage girls
23 more if they would actually touch his penis?

24 MR. RHEINHART: Same instruction, same
25 objection.

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1 MR. RHEINHART: Yeah, whenever you get to
2 a convenient point in your questioning, I think
3 we can use a break. If you're in the middle of
4 something, I don't want to stop you.

5 MR. KUVIN: No, this is fine. We can take
6 a quick break. Five minutes?

7 MR. RHEINHART: Yes, thank you.

8 THE VIDEOGRAPHER: We're now off the
9 record. It is 2:08 p.m.

10 (A brief recess was held.)
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1 THE WITNESS: On the instruction of my
2 lawyer, I must choose to assert my Fifth
3 Amendment right.

4 BY MR. KUVIN:

5 Q. Would Mr. Epstein pay the underage girls
6 more if he would allow them to have sex with them?

7 MR. RHEINHART: Can you restate that
8 again?

9 MR. KUVIN: Yes.

10 BY MR. KUVIN:

11 Q. Would Mr. Epstein pay the underage girls
12 more money if they would allow him to have sex with
13 them?

14 MR. RHEINHART: Objection to the form,
15 standing objection. Instruct the witness not
16 to answer.

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

19 MR. KUVIN: Hang on one second. You can
20 stop at any time I'll sign it.

21 MR. RHEINHART: Mr. Kuvin, I don't know if
22 you're getting to a convenient breaking point
23 but --

24 MR. KUVIN: Do you want to take a quick
25 one?

47 (Pages 185 to 187)