

EXHIBIT 11

PART 2

Page 97	Page 99
1 MR. RHEINHART: Same instruction.	1 assumes facts that have not been established
2 THE WITNESS: On the instruction of my	2 and it's compound.
3 lawyer, I must invoke my Fifth Amendment	3 THE WITNESS: On the instruction of my
4 privilege.	4 lawyer, I must invoke my Fifth Amendment
5 BY MR. KUVIN:	5 privilege.
6 Q. Have you ever worked as a professional	6 MR. RHEINHART: And to clarify the
7 model?	7 objection is that it assumes that she's ever
8 MR. RHEINHART: May I consult?	8 met or knows anything about Jean-Luc Brunel.
9 MR. KUVIN: Sure.	9 BY MR. KUVIN:
10 MR. RHEINHART: You can answer the	10 Q. Were you ever promised anything regarding
11 question.	11 your modeling career by Jeffrey Epstein?
12 THE WITNESS: Yes.	12 MR. RHEINHART: Same objection, instruct
13 BY MR. KUVIN:	13 the witness not to answer.
14 Q. When?	14 THE WITNESS: On the instruction of my
15 A. I don't remember. I don't remember the dates.	15 lawyer, I must invoke my Fifth Amendment
16 It was at least maybe ten years ago.	16 privilege.
17 Q. And you're how old now?	17 BY MR. KUVIN:
18 MR. RHEINHART: I'll instruct the witness	18 Q. You would agree with me that there is a
19 not to answer the question. Nice try.	19 financial arrangement between Jean-Luc Brunel and
20 Instruct you not to answer based on	20 Jeffrey Epstein, do you not?
21 your Fifth Amendment privilege.	21 MR. RHEINHART: Objection. It assumes she
22 THE WITNESS: On the instruction of my	22 has any knowledge of either Mr. Epstein or
23 lawyer, I'm going to invoke my Fifth Amendment	23 Mr. Brunel, and as to that she is going to
24 privilege.	24 invoke her Fifth Amendment privilege. The
25 MR. KUVIN: I'm just trying to find out.	25 question is compound and therefore ambiguous.
Page 98	Page 100
1 MR. RHEINHART: Like I said, good try.	1 THE WITNESS: On the instruction of my
2 Move on.	2 lawyer, I must invoke my Fifth Amendment
3 BY MR. KUVIN:	3 privilege.
4 Q. With respect to your work as a	4 BY MR. KUVIN:
5 professional model, what company did you work for?	5 Q. Would you agree with me that
6 MR. RHEINHART: Instruct the witness not	6 Ghislaine Maxwell provides underage girls to
7 to answer based on the Fifth Amendment	7 Mr. Epstein for sex?
8 privilege.	8 MR. RHEINHART: Objection to the form. It
9 THE WITNESS: On the instruction of my	9 assumes she knows anything at all about
10 lawyer, I invoke my Fifth Amendment privilege.	10 Ghislaine Maxwell and asks her to assume that
11 BY MR. KUVIN:	11 she does, and therefore it is compound and
12 Q. What is your understanding of	12 ambiguous, and I would instruct her not to
13 Mr. Epstein's involvement with the modeling	13 answer.
14 industry?	14 THE WITNESS: Upon the instruction of my
15 MR. RHEINHART: Standing objection, and	15 lawyer, I must invoke my Fifth Amendment
16 instruct the witness not to answer based on	16 privilege.
17 Fifth Amendment, on that basis.	17 MR. KUVIN: That's a good point. Take a
18 THE WITNESS: Upon the instruction of my	18 look at what we'll mark as Exhibit 10.
19 lawyer, I must invoke my Fifth Amendment	19 (Plaintiff's Exhibit No. 10 was marked for
20 privilege.	20 identification.)
21 BY MR. KUVIN:	21 MR. KUVIN: All me to show it to the
22 Q. Were you ever promised anything regarding	22 camera first.
23 your modeling career by Jean-Luc Brunel?	23 MR. RHEINHART: Okay.
24 MR. RHEINHART: Instruct the witness not	24 MR. KUVIN: Okay.
25 to answer based on Fifth Amendment, also	25 THE WITNESS: Okay.

<p>1 BY MR. KUVIN:</p> <p>2 Q. Take a look at what we marked as Exhibit</p> <p>3 10. Do you recognize the two people in that</p> <p>4 photograph?</p> <p>5 MR. RHEINHART: I'll instruct the witness</p> <p>6 not to answer based on her Fifth Amendment</p> <p>7 privilege.</p> <p>8 THE WITNESS: On the instruction of my</p> <p>9 lawyer, I must invoke my Fifth Amendment</p> <p>10 privilege.</p> <p>11 BY MR. KUVIN:</p> <p>12 Q. Would you agree with me that's</p> <p>13 Ghislaine Maxwell on the right and Jeffrey Epstein</p> <p>14 on the left?</p> <p>15 MR. RHEINHART: Objection to the form. It</p> <p>16 assumes that she knows who Ghislaine Maxwell</p> <p>17 and Jeffrey Epstein are, and therefore it's</p> <p>18 compound and ambiguous, and I would instruct</p> <p>19 her not to answer.</p> <p>20 THE WITNESS: On the instruction of my</p> <p>21 lawyer, I must invoke my Fifth Amendment</p> <p>22 privilege.</p> <p>23 MR. KUVIN: Okay. I will mark this as</p> <p>24 Exhibit 11.</p> <p>25</p>	<p>1 You're asking the witness three</p> <p>2 questions at the same time, and I would</p> <p>3 instruct her not to answer based on the</p> <p>4 Fifth Amendment.</p> <p>5 THE WITNESS: On the instruction of my</p> <p>6 lawyer, I must invoke my Fifth Amendment</p> <p>7 privilege.</p> <p>8 MR. KUVIN: Just so we're clear, had she</p> <p>9 answered the first two questions, then</p> <p>10 obviously I wouldn't have to ask the third one</p> <p>11 that has all of them in it but --</p> <p>12 MR. RHEINHART: If you had accepted her</p> <p>13 answer, you would have known that she wasn't</p> <p>14 going to answer these, and we could have saved</p> <p>15 a few minutes.</p> <p>16 MR. KUVIN: And as you well know, I must</p> <p>17 ask the question in order to gain the inference</p> <p>18 at trial.</p> <p>19 MR. RHEINHART: I understand.</p> <p>20 MR. KUVIN: All right.</p> <p>21 (Plaintiff's Exhibit No. 12 was marked for</p> <p>22 identification.)</p> <p>23 BY MR. KUVIN:</p> <p>24 Q. Do you recognize the gentleman that is</p> <p>25 shown --</p>
<p>1 (Plaintiff's Exhibit No. 11 was marked for</p> <p>2 identification.)</p> <p>3 BY MR. KUVIN:</p> <p>4 Q. Let me show you what we marked as</p> <p>5 Exhibit 11. Hang on one second.</p> <p>6 MR. RHEINHART: Sure.</p> <p>7 BY MR. KUVIN:</p> <p>8 Q. Do you recognize the young lady shown in</p> <p>9 Exhibit 11?</p> <p>10 MR. RHEINHART: I'll instruct the witness</p> <p>11 not to answer based on her Fifth Amendment</p> <p>12 privilege.</p> <p>13 THE WITNESS: On the instruction of my</p> <p>14 lawyer, I must invoke my Fifth Amendment</p> <p>15 privilege.</p> <p>16 BY MR. KUVIN:</p> <p>17 Q. Do you agree with me that the young girl</p> <p>18 shown in Exhibit 11 was recruited by Ghislaine</p> <p>19 Maxwell to, for sexual activity with</p> <p>20 Jeffrey Epstein?</p> <p>21 MR. RHEINHART: Objection to the form. It</p> <p>22 assumes she knows who the person is in Exhibit</p> <p>23 11, and assumes she knows who Ghislaine Maxwell</p> <p>24 is, and assumes she knows who Jeffrey Epstein</p> <p>25 is, and is therefore compound.</p>	<p>1 Page 102</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>1 Page 104</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 105</p> <p>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.</p>	<p style="text-align: right;">Page 107</p> <p>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.</p>
<p style="text-align: right;">Page 106</p> <p>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</p>	<p style="text-align: right;">Page 108</p> <p>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.</p>

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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

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 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

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.	1 MR. RHEINHART: Okay. I would be happy
2 BY MR. KUVIN:	2 to.
3 Q. Do you know who Larry is, as referred to	3 MR. KUVIN: I just want to clarify,
4 in Page 2 of Exhibit 4?	4 because I don't think --
5 MR. RHEINHART: I'm sorry. Can you --	5 MR. RHEINHART: Okay.
6 BY MR. KUVIN:	6 MR. KUVIN: I don't think this is a
7 Q. Do you know who --	7 problem, but I just want to clear it up.
8 MR. RHEINHART: -- restate the question?	8 MR. RHEINHART: Thank you, Mr. Kuvin.
9 BY MR. KUVIN:	9 I'll let her answer that question.
10 Q. Do you know who Larry is as referred to in	10 MR. KUVIN: Not a problem.
11 Page 2 of Exhibit 4?	11 MR. RHEINHART: So the question pending
12 MR. RHEINHART: So, just so I'm clear,	12 is, is that your handwriting?
13 what the question is, the document on its face	13 MR. KUVIN: Correct.
14 has the name Larry in it. You're just asking	14 BY MR. KUVIN:
15 this witness whether she knows who this person	15 Q. Is this your handwriting? Just yes or no.
16 Larry is?	16 A. No.
17 MR. KUVIN: Correct.	17 Q. Okay. Thank you. All right. Let's look
18 MR. RHEINHART: Instruct the witness not	18 at Page 4 of Exhibit 4. All right. This one's a
19 to answer based on her Fifth Amendment	19 little different. Is this your handwriting?
20 privilege.	20 MR. RHEINHART: Let me consult with her
21 THE WITNESS: On the instruction of my	21 again.
22 lawyer, I must invoke my Fifth Amendment right.	22 Okay. That's fine. You can answer
23 BY MR. KUVIN:	23 the question consistent with the
24 Q. Do you know why Larry was recommending	24 conversation we just had.
25 that Mr. Epstein leave?	25 THE WITNESS: No.
Page 114	Page 116
1 MR. RHEINHART: Objection to the form and	1 BY MR. KUVIN:
2 instruct the witness not to answer based upon	2 Q. Do you know who Danielle is as referred to
3 her Fifth Amendment privilege.	3 in this note of Page 4 of Exhibit 4?
4 THE WITNESS: On the instruction of my	4 MR. RHEINHART: Instruct the witness not
5 lawyer, I must invoke my Fifth Amendment right.	5 to answer based on her Fifth Amendment
6 BY MR. KUVIN:	6 privilege.
7 Q. Would you agree with me that Larry was	7 THE WITNESS: On the instruction of my
8 calling to warn Mr. Epstein to leave town because he	8 lawyer, I must exercise my Fifth Amendment
9 was going to be arrested?	9 right.
10 MR. RHEINHART: Objection to the form.	10 BY MR. KUVIN:
11 The question assumes facts that are not before	11 Q. All right. Let's look at Page 5,
12 her, and it requires her to speculate, and also	12 Exhibit 4.
13 implies that she knows anything at all about	13 Before we go to Page 5, rather, going
14 Jeffrey Epstein, so I will instruct her not to	14 back to Page 4 for a minute. Will you agree with me
15 answer.	15 that Danielle as referred to in Page 4 of Exhibit 4
16 THE WITNESS: On the instruction of my	16 is a girl that is under the age of 16?
17 lawyer, I wish to exercise my Fifth Amendment	17 MR. RHEINHART: Object to the form. You
18 right.	18 previously asked if she knew who Danielle was,
19 BY MR. KUVIN:	19 and she invoked her Fifth Amendment privilege.
20 Q. Take a look at Page 3 of Exhibit 4,	20 Since the new question presumes that she does
21 please. Is that your handwriting?	21 know who Danielle is she is going to invoke her
22 MR. RHEINHART: I'll instruct her not to	22 Fifth Amendment privilege upon my instruction.
23 answer based on the Fifth Amendment privilege.	23 MR. KUVIN: All right. Let's look at
24 MR. KUVIN: Before we do that, would you	24 Page 5.
25 consult with her?	25 MR. RHEINHART: Let her answer.

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1 MR. KUVIN: I'm sorry, go ahead.
 2

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

7 BY MR. KUVIN:

8 Q. All right. Take a look at Page 5, if you
 9 would. Have you ever ordered anything, anything
 10 yourself from Amazon.com?
 11

12 MR. RHEINHART: You're asking for herself
 13 or anyone else if she has ever placed an order
 14 with Amazon.com for any reason?
 15

16 MR. KUVIN: I am asking whether she
 17 personally has ever placed an order with a
 18 company called Amazon.com.
 19

20 MR. RHEINHART: Yes or no. You can answer
 21 that.
 22

23 THE WITNESS: Yes.
 24

25 BY MR. KUVIN:

1 Q. Okay. So you would agree with me that you
 2 know what Amazon.com is?
 3

4 A. Yes.
 5

6 Q. Okay. Now, have you ever placed an order
 7 through Amazon.com for things to be delivered at
 8 358 El Brillo Way?
 9

10 MR. RHEINHART: Instruct the witness to
 11

1 that Page 5 of Exhibit 4 appears to be a receipt for
 2 books ordered through Amazon.com?
 3

4 MR. RHEINHART: You can answer that yes or
 5 no.
 6

7 THE WITNESS: It looks like a receipt from
 8 Amazon.
 9

10 BY MR. KUVIN:

11 Q. Okay. And did you place this order for
 12 Jeffrey Epstein?
 13

14 MR. RHEINHART: Instruct the witness not
 15 to answer the question in that the question
 16 presumes that she knows who Jeffrey Epstein is,
 17 and therefore, I instruct her not to answer.
 18

19 THE WITNESS: On advice of counsel, I must
 20 invoke my Fifth Amendment privilege.
 21

22 BY MR. KUVIN:

23 Q. Have you ever read the book identified in
 24 Page 5 of Exhibit 4 called Slave Craft: Road Maps
 25 for Erotic Servitude - Principals, Skills and Tools?
 26

27 MR. RHEINHART: Instruct the witness not
 28 to answer based on her Fifth Amendment
 29 privilege.
 30

31 THE WITNESS: On the instruction of my
 32 lawyer, I must choose to invoke my Fifth
 33 Amendment right.
 34

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1 invoke her Fifth Amendment privilege as to that
 2 question.
 3

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

8 BY MR. KUVIN:

9 Q. Will you agree with me --
 10

11 MR. RHEINHART: I'm sorry, Mr. Kuvin, for,
 12 for the record, the page, pages of this exhibit
 13 are not numbered, but the page we're looking at
 14 purports to be a receipt for an order from
 15 Amazon.com; is that correct?
 16

17 MR. KUVIN: Correct. I just want her to
 18 establish foundation before I got into
 19 specifics.
 20

21 MR. RHEINHART: No, but you referred to it
 22 as Page 5, but they are not numbered, so I just
 23 wanted to make sure that we're looking at the
 24 same page on the exhibit.
 25

26 MR. KUVIN: That is true. I'm just trying
 27 to establish foundation for the questions I'm
 28 about to ask her.
 29

30 MR. RHEINHART: Understood.
 31

32 BY MR. KUVIN:

33 Q. All right. Ma'am, would you agree with me
 34

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

6 MR. RHEINHART: Objection to the form in
 7 that it presumes she knows Jeffrey Epstein and
 8 has ever been to 358 El Brillo Way. So, I
 9 instruct her not to answer based on the Fifth
 10 Amendment.
 11

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

16 BY MR. KUVIN:

17 Q. Have you ever seen the book, Training With
 18 Miss Abernathy: A Workbook for Erotic Slaves and
 19 Their Owners, at the home of Jeffrey Epstein on
 20 358 El Brillo Way?
 21

22 MR. RHEINHART: Same objection and same
 23 instruction as the previous question.
 24

25 THE WITNESS: On the instruction of my
 26 lawyer, I must choose to invoke my Fifth
 27 Amendment right.
 28

29 BY MR. KUVIN:

30 Q. Have you ever read that book that I just
 31 described which is shown in Page 5 of Exhibit 4?
 32

<p style="text-align: right;">Page 121</p> <p>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</p>	<p style="text-align: right;">Page 123</p> <p>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.</p>
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<p style="text-align: right;">Page 122</p> <p>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.</p>	<p style="text-align: right;">Page 124</p> <p>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.</p>
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<p style="text-align: right;">Page 125</p> <p>1 A. No.</p> <p>2 Q. Okay. All right. Let's skip Page 10,</p> <p>3 because I think that's just a duplicate, and go to</p> <p>4 Page 11, if you would.</p> <p>5 MR. RHEINHART: Page 11 is --</p> <p>6 MR. KUVIN: It looks like DTG Operations,</p> <p>7 d/b/a Dollar Rent a Car.</p> <p>8 MR. RHEINHART: Got it. It's a printed</p> <p>9 sheet, not a handwritten sheet.</p> <p>10 MR. KUVIN: Correct.</p> <p>11 MR. RHEINHART: Okay. Thank you.</p> <p>12 BY MR. KUVIN:</p> <p>13 Q. All right. Do you know a gentleman by the</p> <p>14 name of Janusz Banasiak, spelled J-a-n-u-s-z,</p> <p>15 B-a-n-a-s-i-a-k?</p> <p>16 MR. RHEINHART: Instruct the witness not</p> <p>17 to answer based on her Fifth Amendment</p> <p>18 privilege.</p> <p>19 THE WITNESS: On the instruction of, my</p> <p>20 lawyer, I must invoke my Fifth Amendment</p> <p>21 privilege.</p> <p>22 BY MR. KUVIN:</p> <p>23 Q. Ma'am, isn't it true that you rented cars</p> <p>24 through Dollar Rent a Car for underage girls, girls</p> <p>25 under the age of 18?</p>	<p style="text-align: right;">Page 127</p> <p>1 it in giving my advice, so thank you for</p> <p>2 clarifying.</p> <p>3 MR. KUVIN: Absolutely.</p> <p>4 BY MR. KUVIN:</p> <p>5 Q. All right. In Page 11 of Exhibit 4,</p> <p>6 there's a reference in the top right-hand corner, a</p> <p>7 message to a Mr. Goldsmith. Do you see that?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Yes?</p> <p>10 MR. RHEINHART: You have to say yes or no</p> <p>11 on the record.</p> <p>12 THE WITNESS: Yes, I see it.</p> <p>13 BY MR. KUVIN:</p> <p>14 Q. Okay. All right. Do you know who</p> <p>15 Mr. Goldsmith is?</p> <p>16 MR. RHEINHART: I instruct the witness</p> <p>17 not to answer based on her privilege against</p> <p>18 self-incrimination.</p> <p>19 THE WITNESS: At the advice of counsel, I</p> <p>20 must invoke my Fifth Amendment privilege.</p> <p>21 BY MR. KUVIN:</p> <p>22 Q. Is this your handwriting on exhibit -- on</p> <p>23 the messages shown in Exhibit 4, Page 11?</p> <p>24 MR. RHEINHART: Same instruction.</p> <p>25 THE WITNESS: At the advice of counsel, I</p>
<p style="text-align: right;">Page 126</p> <p>1 MR. RHEINHART: Instruct the witness not</p> <p>2 to answer based on the Fifth Amendment</p> <p>3 privilege.</p> <p>4 THE WITNESS: On the instruction of my</p> <p>5 lawyer, I must invoke the Fifth Amendment</p> <p>6 privilege.</p> <p>7 BY MR. KUVIN:</p> <p>8 Q. Did you rent any cars from Dollar Rent a</p> <p>9 Car in West Palm Beach in the last five years?</p> <p>10 MR. RHEINHART: Same instruction.</p> <p>11 THE WITNESS: On the instruction of my</p> <p>12 lawyer, I must invoke my Fifth Amendment</p> <p>13 privilege.</p> <p>14 BY MR. KUVIN:</p> <p>15 Q. Let's take a look at Page 11.</p> <p>16 MR. RHEINHART: If we can just -- let me</p> <p>17 go back, Mr. Kuvin, to clarify the prior two</p> <p>18 questions. When you say, "did you rent," did</p> <p>19 you mean did she personally pay for the rental,</p> <p>20 or was she, in any way, involved in arranging</p> <p>21 the rental?</p> <p>22 MR. KUVIN: The second part, in any way</p> <p>23 involved in arranging for the rental of a</p> <p>24 vehicle.</p> <p>25 MR. RHEINHART: That's how I interpreted</p>	<p style="text-align: right;">Page 128</p> <p>1 must invoke my Fifth Amendment privilege.</p> <p>2 MR. RHEINHART: Hold on a second, Sarah.</p> <p>3 MR. KUVIN: Yeah, check.</p> <p>4 MR. RHEINHART: Okay. Can you repeat the</p> <p>5 question again? Maybe I misheard it,</p> <p>6 Mr. Kuvin.</p> <p>7 MR. KUVIN: Yeah, not a problem. Let me</p> <p>8 lay a little foundation for it.</p> <p>9 MR. RHEINHART: That's okay. If you can</p> <p>10 just ask the question again. I think I just</p> <p>11 misheard what you were asking.</p> <p>12 BY MR. KUVIN:</p> <p>13 Q. Is this your handwriting shown on the</p> <p>14 messages which is Page 11 of Exhibit 4?</p> <p>15 A. No.</p> <p>16 Q. Okay. Is this handwriting that of</p> <p>17 Ms. Sjoberg?</p> <p>18 MR. KUVIN: Johanna -- I'm sorry, Sjoberg,</p> <p>19 Sjoberg? How do you pronounce it, Sjoberg?</p> <p>20 MS. CADWELL: Sjoberg?</p> <p>21 MR. KUVIN: I knew somebody would know.</p> <p>22 MR. RHEINHART: Did we get a</p> <p>23 pronunciation, I'm sorry?</p> <p>24 MR. KUVIN: Yes.</p>

<p style="text-align: right;">Page 129</p> <p>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.</p>	<p style="text-align: right;">Page 131</p> <p>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</p>
<p style="text-align: right;">Page 130</p> <p>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</p>	<p style="text-align: right;">Page 132</p> <p>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</p>

<p style="text-align: right;">Page 133</p> <p>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"?</p> <p>5 MR. RHEINHART: Okay. Hold on. Can you 6 just show me what page you're looking at? 7 Okay. We skipped a page.</p> <p>8 THE WITNESS: No.</p> <p>9 BY MR. KUVIN: 10 Q. Okay. Do you recognize whose it is? 11 MR. RHEINHART: Let me talk to you again.</p> <p>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.</p> <p>15 A. No, no. Sorry.</p> <p>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?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Do you know what that is talking 23 about?</p> <p>24 A. No.</p> <p>25 Q. Is that your handwriting?</p>	<p style="text-align: right;">Page 133</p> <p>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?</p> <p>6 MR. RHEINHART: Object to the form of the 7 question. It's compound and I instruct the 8 witness not to answer.</p> <p>9 THE WITNESS: On advice of counsel, I wish 10 to invoke my Fifth Amendment right.</p> <p>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.</p> <p>16 Do you know who Haley is as referred 17 to in this note?</p> <p>18 A. On the advice of counsel, I must invoke my 19 Fifth Amendment right.</p> <p>20 Q. Do you know who Sage is as referred to in 21 this note?</p> <p>22 A. On the advice of counsel, I must invoke my 23 Fifth Amendment right.</p> <p>24 MR. GARCIA: I haven't heard the counsel 25 give any advice.</p>
<p style="text-align: right;">Page 134</p> <p>1 A. No.</p> <p>2 Q. Did Mr. Epstein obtain girls under the age 3 of 16 from St. Bart's?</p> <p>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.</p> <p>8 THE WITNESS: On advice of counsel, I must 9 invoke my Fifth Amendment privilege.</p> <p>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?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Do you know who Melissa Hanes is?</p> <p>18 A. On the advice of counsel, I wish to invoke my 19 Fifth Amendment right.</p> <p>20 Q. All right. The note appears to say: She 21 called again, if she could work any time Monday 22 through Friday.</p> <p>23 Do you know what that message 24 pertains to?</p> <p>25 A. On advice of counsel, I wish to invoke my</p>	<p style="text-align: right;">Page 134</p> <p>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?</p> <p>5 MR. RHEINHART: I'm changing the procedure 6 for Mr. Kuvin.</p> <p>7 MR. KUVIN: I'm all happy for speed.</p> <p>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?</p> <p>14 MR. RHEINHART: Instruct the witness not 15 to answer based on her Fifth Amendment 16 privilege and self-incrimination.</p> <p>17 THE WITNESS: On advice of counsel, I must 18 invoke my Fifth Amendment right.</p> <p>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.</p> <p>22 THE VIDEOGRAPHER: I can't really read 23 that.</p> <p>24 MR. KUVIN: Do I need to tilt it?</p> <p>25 THE VIDEOGRAPHER: I think you need to</p>

1 bring the whole paper up closer.
 2

3 MR. KUVIN: Towards you?

4 THE VIDEOGRAPHER: Yes, towards the lens.

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

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

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

12 BY MR. KUVIN:

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

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

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

1 Do you -- first of all, do you see
 2 that in front of you? Are we talking about the same
 3 thing here?

4 A. Yes.

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

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

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

13 BY MR. KUVIN:

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

16 A. On the --

17 Q. -- on either note?

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

20 Q. Is that your handwriting on the left in
 21 the note that I just read that says: Haley,
 22 11:00 a.m.?

23 MR. RHEINHART: Same instruction.

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

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1 BY MR. KUVIN:

2 Q. Would you agree with me that this message
 3 is a message from Jean-Luc, that he's providing a
 4 16-year-old girl to Jeffrey Epstein?

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

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

13 BY MR. KUVIN:

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

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

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

21 MR. RHEINHART: Thank you.

22 BY MR. KUVIN:

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

1 privilege.

2 BY MR. KUVIN:

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

6 MR. RHEINHART: Let me talk to her.

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

9 BY MR. KUVIN:

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

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

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

19 BY MR. KUVIN:

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

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

25 THE WITNESS: On the instruction of my

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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 referring
17 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?

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

<p style="text-align: right;">Page 145</p> <p>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</p>	<p style="text-align: right;">Page 147</p> <p>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?</p>
<p style="text-align: right;">Page 146</p> <p>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</p>	<p style="text-align: right;">Page 148</p> <p>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</p>

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

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.

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

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

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?

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

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?

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?

<p style="text-align: center;">Page 157</p> <p>1 MR. RHEINHART: Objection to the form, 2 standing objection. Instruct the witness not 3 to answer.</p> <p>4 THE WITNESS: On the instruction from my 5 lawyer, I must choose to invoke my Fifth 6 Amendment right.</p> <p>7 BY MR. KUVIN:</p> <p>8 Q. Do you agree with me that Mr. Epstein 9 threatened C.L. with physical violence?</p> <p>10 MR. RHEINHART: Objection to the form, the 11 standing objection, as well as ambiguous as to 12 the term "threaten." Instruct the witness not 13 to answer.</p> <p>14 THE WITNESS: Upon instruction from my 15 lawyer, I must choose to invoke my Fifth 16 Amendment right.</p> <p>17 BY MR. KUVIN:</p> <p>18 Q. Do you agree with me that Jeffrey Epstein 19 told C.L. that if she talks to anyone about what had 20 occurred at his home, bad things would happen to 21 her?</p> <p>22 MR. RHEINHART: Objection to the form, 23 it's compound, and a standing objection. Also 24 assumes numerous other facts that this witness 25 has not acknowledge nor admitted, and therefore</p>	<p style="text-align: center;">Page 159</p> <p>1 BY MR. KUVIN:</p> <p>2 Q. Would you agree with see that you visited 3 a man by the name of Jeffrey Epstein while he was in 4 jail in Palm Beach County?</p> <p>5 MR. RHEINHART: Objection to the form, 6 standing objection. Assumes other facts that 7 this witness has not acknowledged, and instruct 8 her not to answer.</p> <p>9 THE WITNESS: Upon instruction from the 10 lawyer, I must choose to invoke my Fifth 11 Amendment right.</p> <p>12 BY MR. KUVIN:</p> <p>13 Q. Do you agree that you arranged to have 14 C.L. come to Jeffrey Epstein's home for a nude 15 massage?</p> <p>16 MR. RHEINHART: Objection to the form, 17 standing objection previously stated.</p> <p>18 THE WITNESS: On the instruction of my 19 lawyer, I must choose to invoke my Fifth 20 Amendment right.</p> <p>21 BY MR. KUVIN:</p> <p>22 Q. Do you agree that C.L. has been to 23 358 El Brillo Way on at least two occasions?</p> <p>24 MR. RHEINHART: Objection to the form. It 25 assumes knowledge of C.L. and of 358 El Brillo</p>
<p style="text-align: center;">Page 158</p> <p>1 I instruct her not to answer.</p> <p>2 THE WITNESS: On the instruction from my 3 lawyer, I must choose to invoke my Fifth 4 Amendment privilege.</p> <p>5 BY MR. KUVIN:</p> <p>6 Q. Would you agree with me that in 2005 that 7 Jeffrey Epstein was between the ages of 45 and 55 8 years old?</p> <p>9 MR. RHEINHART: Objection to the form. 10 Standing objection as to any knowledge of 11 Jeffrey Epstein. Instruct the witness not to 12 answer.</p> <p>13 THE WITNESS: The instruction of my 14 lawyer, I must choose to assert my Fifth 15 Amendment right.</p> <p>16 BY MR. KUVIN:</p> <p>17 Q. Would you agree with me that 18 Jeffrey Epstein has tremendous wealth?</p> <p>19 MR. RHEINHART: Objection to the form as 20 stated in the previous question, and instruct 21 the witness not to answer.</p> <p>22 THE WITNESS: On the instruction from the 23 lawyer, I must choose to invoke my Fifth 24 Amendment right.</p>	<p style="text-align: center;">Page 160</p> <p>1 Way, to which the witness has not acknowledged, 2 and instruct the witness not to answer.</p> <p>3 THE WITNESS: On the instruction of my 4 lawyer, I must choose to invoke my Fifth 5 Amendment right.</p> <p>6 BY MR. KUVIN:</p> <p>7 Q. Do you agree that Mr. Epstein has an 8 odd-shaped penis?</p> <p>9 MR. RHEINHART: Objection to the form of 10 the question. It assumes knowledge of 11 Mr. Epstein. It assumes knowledge of 12 Mr. Epstein's body parts, and instruct the 13 witness not to answer.</p> <p>14 THE WITNESS: On advice -- on the 15 instruction of my lawyer, I must choose to 16 invoke my Fifth Amendment right.</p> <p>17 BY MR. KUVIN:</p> <p>18 Q. Have you seen Jeffrey Epstein's penis?</p> <p>19 MR. RHEINHART: Objection to the form, and 20 we're getting awfully close to a line here, Mr. 21 Kuvin.</p> <p>22 MR. KUVIN: I think the identity of 23 something that young 14 and 15-year-old girls 24 have seen is directly relevant to the issues in 25 this case. If they can describe it, then</p>

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

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

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?

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

<p style="text-align: center;">Page 165</p> <p>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</p>	<p style="text-align: center;">Page 167</p> <p>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.</p>
<p style="text-align: center;">Page 166</p> <p>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</p>	<p style="text-align: center;">Page 168</p> <p>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</p>

	Page 169	
1	to answer the question based on her Fifth	1
2	Amendment privilege.	2
3	THE WITNESS: On the instruction of my	3
4	lawyer, I must choose to invoke my Fifth	4
5	Amendment right.	5
6	BY MR. KUVIN:	6
7	Q. In fact, you were around when	7
8	Jeffrey Epstein bought Radar Online, were you not?	8
9	MR. RHEINHART: Objection to the form,	9
10	standing objection as to any knowledge of	10
11	Jeffrey Epstein or of Radar Online, and	11
12	instruct the witness not to answer.	12
13	THE WITNESS: On the instruction from my	13
14	lawyer, I must choose to invoke my Fifth	14
15	Amendment right.	15
16	BY MR. KUVIN:	16
17	Q. Are you aware that Jeffrey Epstein	17
18	accessed or obtained underage girls through his	18
19	Radar connection?	19
20	MR. RHEINHART: Same objection as	20
21	previously stated to the last question and same	21
22	instruction.	22
23	THE WITNESS: On the instruction from my	23
24	lawyer, I must choose to invoke my Fifth	24
25	Amendment privilege.	25
	Page 170	
1	BY MR. KUVIN:	1
2	Q. How many different properties does	2
3	Jeffrey Epstein own?	3
4	MR. RHEINHART: Objection to the form,	4
5	standing objection. Instruct the witness not	5
6	to answer.	6
7	THE WITNESS: On the instruction of my	7
8	lawyer, I must choose to invoke my Fifth	8
9	Amendment right.	9
10	BY MR. KUVIN:	10
11	Q. You've been to all of Jeffrey Epstein's	11
12	home, have you not?	12
13	MR. RHEINHART: Same objection as	13
14	previously stated to the last question. Same	14
15	instruction.	15
16	THE WITNESS: On the instruction from my	16
17	lawyer, I must invoke my Fifth Amendment right.	17
18	BY MR. KUVIN:	18
19	Q. You agree with me that Jeffrey Epstein	19
20	keeps a list of girls in the nearby areas around all	20
21	of his homes and properties?	21
22	MR. RHEINHART: Objection to the form, for	22
23	the standing objection as well as ambiguous as	23
24	to "nearby," and "all of his properties," so I	24
25	instruct the witness not to answer.	25
	Page 171	
1	THE WITNESS: On the instruction from my	1
2	lawyer, I choose to invoke my Fifth Amendment	2
3	right.	3
4	BY MR. KUVIN:	4
5	Q. Would you agree with me that Jeffrey	5
6	Epstein has a list of underage girls that live	6
7	within a close proximity to all of his different	7
8	homes in every different state?	8
9	MR. RHEINHART: Objection to the form in	9
10	that it assumes Mr. Epstein has homes in every	10
11	single state and that she knows who Mr. Epstein	11
12	is, and therefore I instruct her not to answer.	12
13	THE WITNESS: On advice of my lawyer, I	13
14	must choose to invoke my Fifth Amendment right.	14
15	BY MR. KUVIN:	15
16	Q. You're aware Mr. Epstein has a home in New	16
17	York, right?	17
18	MR. RHEINHART: Instruct the witness not	18
19	to answer, and standing objection of knowledge	19
20	of Mr. Epstein.	20
21	THE WITNESS: On the instruction of my	21
22	lawyer, I must invoke my Fifth Amendment right.	22
23	BY MR. KUVIN:	23
24	Q. Are you aware that he has a home in New	24
25	Mexico?	25
	Page 172	
1	MR. RHEINHART: By he, you mean	1
2	Mr. Epstein?	2
3	MR. KUVIN: Yeah.	3
4	MR. RHEINHART: Got to make sure the	4
5	question is clear.	5
6	MR. KUVIN: Yes.	6
7	MR. RHEINHART: Standing objection to the	7
8	form and instruct the witness not to answer.	8
9	THE WITNESS: On the instruction from my	9
10	lawyer, I must choose to invoke my Fifth	10
11	Amendment privilege.	11
12	BY MR. KUVIN:	12
13	Q. Are you aware he has a home in the U.S.	13
14	Virgin Islands?	14
15	MR. RHEINHART: Same instruction, same	15
16	objection.	16
17	THE WITNESS: On the instruction of my	17
18	lawyer, I must choose to invoke my Fifth	18
19	Amendment right.	19
20	BY MR. KUVIN:	20
21	Q. And isn't it true that you kept a list of	21
22	underage girls that could service, in other words,	22
23	give Mr. Epstein naked massages in every place that	23
24	he has one of those homes I just described?	24
25	MR. RHEINHART: Same objection as	25

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

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 --

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

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.

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.

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?

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

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?

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.

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.

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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.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?