

EXHIBIT 14

(Filed Under Seal)

Page 1	Page 3
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA	1 IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT 2 IN AND FOR PALM BEACH COUNTY, FLORIDA 3 CASE NO. 502008CA028051XXXXMB AB
CASE NO. 08-CIV-80119-MARRA/JOHNSON	4 L.M., 5 Plaintiff, 6 -vs- VOLUME I OF III 7 JEFFREY EPSTEIN, 8 Defendant.
JANE DOE NO. 2, Plaintiff, -vs- VOLUME I OF III JEFFREY EPSTEIN, Defendant.	9 /
Related cases: 08-80232, 08-08380, 08-80381, 08-80994 08-80993, 08-80811, 08-80893, 09-80469 09-80591, 09-80656, 09-80802, 09-81092	10 /
VIDEOTAPED DEPOSITION OF SARAH KELLEN	11 VIDEOTAPED DEPOSITION OF 12 SARAH KELLEN
Wednesday, March 24, 2010 10:37 - 6:51 p.m.	13 /
250 Australian Avenue South Suite 1500 West Palm Beach, Florida 33401	14 Wednesday, March 24, 2010 15 10:37 - 6:51 p.m.
Reported By: Cynthia Hopkins, RPR, FPR Notary Public, State of Florida Prose Court Reporting Services Job No.: 1484	16 250 Australian Avenue South 17 Suite 1500 18 West Palm Beach, Florida 33401
	19 Reported By: 20 Cynthia Hopkins, RPR, FPR 21 Notary Public, State of Florida 22 Prose Court Reporting Services 23 Job No.: 1484
Page 2	Page 4
1 IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT 2 IN AND FOR PALM BEACH COUNTY, FLORIDA 3 CASE NO. 502008CA028058XXXXMB AD	1 IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL 2 CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA 3 CASE No.502008CA037319XXXXMB AB
E.W.,	4 B.B.
5 Plaintiff, 6 -vs- VOLUME I OF III	5 Plaintiff, 6 -vs- VOLUME I OF III
7 JEFFREY EPSTEIN,	7 JEFFREY EPSTEIN 8 AND SARAH KELLEN,
9 Defendant.	9 Defendants.
10 /	10 /
11 VIDEOTAPED DEPOSITION OF 12 SARAH KELLEN	11 VIDEOTAPED DEPOSITION OF 12 SARAH KELLEN
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1 (Pages 1 to 4)

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

<p style="text-align: center;">Page 21</p> <p>1 answer the question based on her Fifth 2 Amendment privilege.</p> <p>3 THE WITNESS: On the instruction of my 4 lawyer, I must invoke my Fifth Amendment right.</p> <p>5 BY MR. KUVIN:</p> <p>6 Q. Who introduced you to Jeffrey Epstein the 7 first time that you met him?</p> <p>8 MR. RHEINHART: Same instruction.</p> <p>9 THE WITNESS: On the instruction of my 10 lawyer, I must invoke my Fifth Amendment right.</p> <p>11 BY MR. KUVIN:</p> <p>12 Q. Did Ghislaine Maxwell introduce you to 13 Jeffrey Epstein for the first time?</p> <p>14 MR. RHEINHART: Same instruction.</p> <p>15 THE WITNESS: On the instruction of my 16 lawyer, I must invoke my Fifth Amendment right.</p> <p>17 BY MR. KUVIN:</p> <p>18 Q. When was the first time you were in 19 Jeffrey Epstein's home located on El Brillo Way on 20 Palm Beach Island?</p> <p>21 MR. RHEINHART: Object to the form of the 22 question as compound and assuming facts not 23 before the witness. And I instruct the witness 24 not to answer based on her Fifth Amendment 25 privilege.</p>	<p style="text-align: center;">Page 23</p> <p>1 witness, and I will instruct the witness not to 2 answer based on her Fifth Amendment privilege.</p> <p>3 THE WITNESS: On the instruction of my 4 lawyer, I must invoke my Fifth Amendment right.</p> <p>5 BY MR. KUVIN:</p> <p>6 Q. Would you agree with me that 7 Jeffrey Epstein owns numerous planes, private 8 planes?</p> <p>9 MR. RHEINHART: Instruct the witness not 10 to answer.</p> <p>11 THE WITNESS: On the instruction of my 12 lawyer, I must invoke my Fifth Amendment right.</p> <p>13 BY MR. KUVIN:</p> <p>14 Q. And you've been on every one of those 15 private planes; isn't that true?</p> <p>16 MR. RHEINHART: Object to the form. It 17 assumes facts not before the witness, and I 18 will instruct the witness not to answer based 19 on her Fifth Amendment privilege.</p> <p>20 THE WITNESS: On the instruction of my 21 lawyer, I must invoke my Fifth Amendment right.</p> <p>22 BY MR. KUVIN:</p> <p>23 Q. Ma'am, isn't it true that you've seen the 24 passenger manifest for Jeffrey Epstein's plane?</p> <p>25 MR. RHEINHART: Object to the form. It</p>
<p style="text-align: center;">Page 22</p> <p>1 THE WITNESS: On the instruction of my 2 lawyer, I must invoke my Fifth Amendment right.</p> <p>3 BY MR. KUVIN:</p> <p>4 Q. Would you agree with me that 5 Jeffrey Epstein owns a home at 358 El Brillo Way, 6 Palm Beach Island, Florida?</p> <p>7 MR. RHEINHART: Instruct the witness not 8 to answer based on her Fifth Amendment 9 privilege.</p> <p>10 THE WITNESS: On instruction of my 11 counsel, I must invoke my Fifth Amendment 12 right.</p> <p>13 BY MR. KUVIN:</p> <p>14 Q. Would you agree with me that you've been 15 in that home numerous times?</p> <p>16 MR. RHEINHART: Instruct the witness not 17 to answer the question based on her Fifth 18 Amendment privilege.</p> <p>19 THE WITNESS: On instruction of my lawyer, 20 I must invoke my Fifth Amendment right.</p> <p>21 BY MR. KUVIN:</p> <p>22 Q. Would you agree with me that you have gone 23 on Jeffrey Epstein's plane numerous times?</p> <p>24 MR. RHEINHART: Object to the form. It 25 assumes facts that are not present for the</p>	<p style="text-align: center;">Page 24</p> <p>1 assumes facts that are not established as known 2 to this witness, and I instruct the witness not 3 to answer the question based on her Fifth 4 Amendment privilege.</p> <p>5 THE WITNESS: On the instruction of my 6 lawyer, I must invoke my Fifth Amendment right.</p> <p>7 MR. KUVIN: Let me show you what we'll 8 mark as Exhibit 2.</p> <p>9 (Plaintiff's Exhibit No. 2 was marked for 10 identification.)</p> <p>11 MR. KUVIN: Thank you.</p> <p>12 MR. RHEINHART: Do you want to zoom in on 13 it like you did the last time?</p> <p>14 MR. KUVIN: No, that's fine.</p> <p>15 MR. RHEINHART: Take your time.</p> <p>16 MR. KUVIN: And flip through.</p> <p>17 BY MR. KUVIN:</p> <p>18 Q. All right. Ma'am, would you agree with me 19 that this is a passenger manifest for one of 20 Jeffrey Epstein's airplanes?</p> <p>21 MR. RHEINHART: Instruct the witness not 22 to answer the question based on her Fifth 23 Amendment privilege.</p> <p>24 THE WITNESS: On the instruction of my</p>

6 (Pages 21 to 24)

<p style="text-align: right;">Page 37</p> <p>1 THE VIDEOGRAPHER: We're now on video 2 record at 11:01 a.m. 3 MR. KUVIN: Just for the video record and 4 for the written record Katherine Ezell and Amy 5 Ederi have now appeared and are present in 6 person. 7 MR. GOLDBERGER: Just one more matter for 8 the record. Jack Goldberger, on behalf of 9 Jeffrey Epstein. Rather than impose a form 10 objection to every question, I think we have 11 reached an agreement that on behalf of 12 Mr. Epstein, I am adopting the form objections 13 that Mr. Rheinhart is making on behalf of his 14 client nunc pro tunc to the beginning of this 15 deposition. 16 MR. KUVIN: No objection. 17 MR. GOLDBERGER: Okay. 18 BY MR. KUVIN: 19 Q. All right. All right. Ms. Kellen, would 20 you agree with me that there was an agreement 21 between Jeffrey Epstein, Ghislaine Maxwell, 22 Jean-Luc Brunel, yourself and Nadia Marcinkova to 23 bring in girls from out of state that were underage? 24 MR. RHEINHART: Object to the form of the 25 question as leading, as compound, and instruct</p>	<p style="text-align: right;">Page 39</p> <p>1 personal knowledge and instruct her not to 2 answer based on her Fifth Amendment privilege. 3 It's also compound. 4 THE WITNESS: On the instruction of my 5 lawyer I must invoke my Fifth Amendment 6 privilege. BY MR. KUVIN: 7 Q. The witness says that you may not have 8 knowledge or we don't know whether you have 9 knowledge regarding this passenger manifest, so let 10 me ask you, do you have any knowledge about this 11 passenger manifest? 12 MR. RHEINHART: Object to the form of the 13 question as ambiguous as to this and what a 14 manifest is, and also her knowledge, and I will 15 instruct her not to answer based on her Fifth 16 Amendment privilege. 17 THE WITNESS: On the instruction of my 18 lawyer, I must invoke my Fifth Amendment 19 privilege. BY MR. KUVIN: 20 Q. Based on the objection, do you know what a 21 manifest is? 22 MR. RHEINHART: Object to the form of the 23 question as ambiguous and instruct her not to</p>
<p style="text-align: right;">Page 38</p> <p>1 the witness not to answer based on her Fifth 2 Amendment privilege. 3 THE WITNESS: On the instruction of my 4 lawyer I must invoke my Fifth Amendment right. BY MR. KUVIN: 5 Q. Would you agree with me that there was an 6 agreement between Jeffrey Epstein, 7 Ghislaine Maxwell, Jean-Luc Brunel, yourself and 8 Nadia Marcinkova to bring in girls that were 9 underage from out of state for sexual contact? 10 MR. RHEINHART: Object to the form of the 11 question as leading and compound, and I 12 instruct the witness not to answer based on her 13 Fifth Amendment privilege. 14 THE WITNESS: On the instruction of my 15 lawyer I must invoke my Fifth Amendment 16 privilege. 17 BY MR. KUVIN: 18 Q. All right. Let me show you what we've 19 premarked as Plaintiff's Exhibit 3. Do you 20 recognize this as the passenger manifest for one of 21 Jeffrey Epstein's planes? 22 MR. RHEINHART: I object to the form of 23 the question. It assumes facts that this 24 witness, evidence that this witness has no</p>	<p style="text-align: right;">Page 40</p> <p>1 answer based on her Fifth Amendment privilege. 2 THE WITNESS: On the instruction of my 3 lawyer I must invoke my Fifth Amendment right. BY MR. KUVIN: 5 Q. Have you heard the word "manifest" before? 6 MR. RHEINHART: I'll instruct the witness 7 not to answer based on her Fifth Amendment 8 privilege. 9 THE WITNESS: On the instruction of my 10 lawyer I must invoke my Fifth Amendment right. BY MR. KUVIN: 12 Q. Would you agree with me, ma'am, that you 13 have seen this passenger manifest, listed as 14 Exhibit 3, in the past? 15 MR. RHEINHART: I'll instruct the witness 16 not to answer based on her Fifth Amendment 17 privilege. 18 THE WITNESS: On the instruction of my 19 lawyer I must invoke my Fifth Amendment right. BY MR. KUVIN: 21 Q. Who is Zinta Broukis? 22 MR. RHEINHART: I'll instruct the witness 23 not to answer based on her Fifth Amendment 24 privilege. 25 THE WITNESS: On the instruction of my</p>

10 (Pages 37 to 40)

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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.
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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.

25 (Pages 97 to 100)

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1 reasonably designed to lead to discoverable
 2 evidence.
 3 BY MS. EZELL:
 4 Q. Did you facilitate these acts as well as
 5 assisting Mr. Epstein in avoiding police detection?
 6 MR. REINHART: Same instruction.
 7 BY MS. EZELL:
 8 Q. Do you know when and by whom the computers
 9 were removed from the El Brillo mansion?
 10 MR. REINHART: Objection to the form, lack of
 11 foundation, and it also assumes knowledge of a
 12 place known as the El Brillo mansion. So instruct
 13 the witness not to answer the question based on the
 14 Fifth Amendment.
 15 THE WITNESS: At the instruction of my lawyer,
 16 I must invoke my Fifth Amendment right.
 17 BY MS. EZELL:
 18 Q. Was Jane No. 103 invited to just come and hang
 19 out at the El Brillo mansion?
 20 MR. REINHART: Objection to the form, same as
 21 the previous question. It assumes knowledge of a
 22 place known as the El Brillo mansion and a person
 23 by the name of Jane No. 103. It is compound and
 24 lacking in foundation.
 25 THE WITNESS: at the instruction of my lawyer,

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1 I must invoke my Fifth Amendment right.
 2 BY MS. EZELL:
 3 Q. Have you called any girls under the age of 18
 4 in Palm Beach or West Palm Beach in the last six years?
 5 MR. REINHART: For any purpose?
 6 MS. EZELL: Yes.
 7 THE WITNESS: Can you repeat the question?
 8 BY MS. EZELL:
 9 Q. Have you called any girls under the age of 18
 10 in Palm Beach or West Palm Beach in the last six years?
 11 MR. REINHART: You can answer that yes or no,
 12 if you know.
 13 THE WITNESS: I don't think so.
 14 MS. EZELL: I don't have any other questions.
 15 Thank you.
 16 THE VIDEOGRAPHER: All set?
 17 MR. REINHART: Yes.
 18 THE VIDEOGRAPHER: This concludes today's
 19 videotape deposition of Sarah Kellen.
 20 MR. REINHART: Hold on, I'm sorry, one last
 21 thing. Since you're the last defense person or
 22 plaintiff's lawyer standing, I guess you need to
 23 advise her she has the right to read or waive on
 24 the record.
 25 MS. EZELL: You do have the right to read this

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1 deposition or you may waive reading and allow the
 2 court reporter to simply type it up and distribute
 3 it to the lawyers who order it.

4 Do you choose to read or waive?
 5 THE WITNESS: Waive.
 6 MS. EZELL: Thank you.
 7 MR. REINHART: Thank you.
 8 THE VIDEOGRAPHER: Okay, this concludes
 9 today's videotape deposition of Sarah Kellen. The
 10 time is 18:51.
 11 (Witness excused.)
 12 (Deposition was concluded.)

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1 C E R T I F I C A T E
 2 THE STATE OF FLORIDA
 3 COUNTY OF PALM BEACH

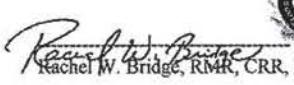
4
 5 I, Rachel W. Bridge, Registered Professional
 6 Reporter, Florida Professional Reporter and Notary
 7 Public in and for the State of Florida at large, do
 8 hereby certify that I was authorized to and did report
 9 said deposition in stenotype; and that the foregoing
 10 pages are a true and correct transcription of my
 11 shorthand notes of said deposition.

12 I further certify that said deposition was
 13 taken at the time and place hereinabove set forth and
 14 that the taking of said deposition was commenced and
 15 completed as hereinabove set out.

16 I further certify that I am not attorney or
 17 counsel of any of the parties, nor am I a relative or
 18 employee of any attorney or counsel of party connected
 19 with the action, nor am I financially interested in the
 20 action.

21 The foregoing certification of this transcript
 22 does not apply to any reproduction of the same by any
 23 means unless under the direct control and/or direction
 24 of the certifying reporter.

25 Dated this 9th day of April, 20



Rachel W. Bridge, RMR, CRR, FPR

21 (Pages 445 to 448)

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Electronically signed by Rachel Bridge (201-272-617-4627)

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