

IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION AG
CASE NO. 502009CA040800XXXXMB
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

SCOTT ROTHSTEIN, individually, and
BRADLEY J. EDWARDS, individually,

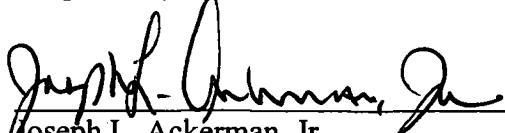
Defendants/Counter-Plaintiffs.

**PLAINTIFF JEFFREY EPSTEIN'S NOTICE OF FILING SUMMARY EXHIBIT OF
OBJECTIONABLE QUESTIONS AND DEPOSITION TRANSCRIPT IN SUPPORT
OF PLAINTIFF'S MOTION FOR PROTECTIVE ORDER RELATING TO HIS
DEPOSITION AND MOTION TO TERMINATE DEPOSITION**

Plaintiff, Jeffrey Epstein, by and through his undersigned counsel and pursuant to the Florida Rules of Civil Procedure, hereby gives notice of filing his Summary Exhibit (attached hereto as Exhibit 1) and the transcript of the Videotaped Deposition of Jeffrey Epstein taken on January 25, 2012 in Support of Plaintiff's Motion for Protective Order Relating to His Deposition and Motion to Terminate Deposition.

Dated: January 27, 2012.

Respectfully submitted,


Joseph L. Ackerman, Jr.
Florida Bar No. 235954
FOWLER WHITE BURNETT, P.A.

SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
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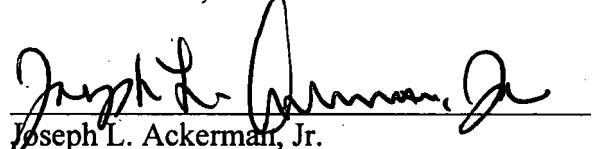
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Attorneys for Plaintiff Jeffrey Epstein

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via e-mail and U.S. Mail on this 27th day of January, 2012 to: Jack Scarola, Esq., Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Blvd., West Palm Beach, FL 33409; Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401-5012; and Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Blvd., Suite 700, Fort Lauderdale, FL 33301.


Joseph L. Ackerman, Jr.

SUMMARY EXHIBIT

Objectionable Questions and Statements Posed by Counsel for Defendant Bradley J. Edwards at the Videotaped Deposition of Jeffrey Epstein Taken on January 25, 2012

<u>Transcript</u>	<u>Questions</u>
Page 6, Line 2	Do you now or have you ever had a sexual addiction?
Page 6, Line 20*	Do you now or have you ever had a sexual preference for minors?
Page 6, Line 24*	Have you ever acted on a sexual preference for minors?
Page 7, Line 3	Have you ever informed anyone other than your legal counsel that you have a sexual preference for minors?
Page 7, Line 8	Have you ever informed anyone other than your legal counsel that you have acted on a sexual preference for minors?
Page 7, Line 13	Have you ever sought or received evaluation, counseling, or treatment for any form of sexual addiction?
Page 7, Line 18	Have you ever sought or received evaluation, counseling, or treatment for any sex-related issue?
Page 7, Line 23	Have you ever retained the services of a consultant to assist in changing your public image following your arrest on sex-related charges?
Page 8, Line 3	Have you ever discussed with anyone undertaking an effort to change your public image following your arrest for and conviction of a sex-related crime?
Page 8, Line 23*	How many times have you solicited for prostitution?
Page 9, Line 1*	How many times have you solicited a minor for prostitution?
Page 9, Line 4	How many times have you solicited for prostitution in the State of Florida?
Page 9, Line 7	How many times have you solicited a minor for prostitution in the State of Florida?
Page 9, Line 10	How many times have you solicited for prostitution in the Virgin Islands?
Page 11, Line 2	Have you ever solicited for prostitution in the Virgin Islands?
Page 11, Line 10	Have you ever solicited for prostitution in New York?
Page 11, Line 13	Have you ever solicited for prostitution in New Mexico?
Page 11, Line 16	Have you ever solicited for prostitution in Paris?
Page 11, Line 19*	Have you ever solicited for prostitution anywhere at any time?
Page 11, Line 22	Have you ever solicited a minor for prostitution anywhere at any time?
Page 11, Line 25*	Who is the prostitute that you solicited for prostitution with respect to the claim on which you were convicted?
Page 12, Line 4*	Who is the minor that you solicited for prostitution with respect to the claim on which you pled guilty?
Page 12, Line 13*	Did you, in fact, plead guilty to soliciting a minor for prostitution?
Page 12, Line 16	Where was it that you solicited for prostitution in the manner – in the matter in which you pled guilty?

EXHIBIT

1

*Questions asked before by Mr. Scarola in March 17, 2010 Deposition of Jeffrey Epstein.

<u>Transcript</u>	<u>Questions</u>
Page 12, Line 20*	When was it that you solicited for prostitution in the matter in which you pled guilty?
Page 12, Line 23	Have you ever discussed your sex-related arrest or conviction with any reporter or news media representative?
Page 13, Line 22	Have you ever discussed your sex-related activities with minors in the State of Florida with any reporter or news media representative?
Page 21, Line 10*	Did you, in fact, engage in any sexual conduct with LM?
Page 21, Line 17*	How many times did you engage in sexual conduct with LM?

Transcript Statements

Page 23, Line 5 through Page 24, Line 7:

Mr. Scarola:

So that the record is clear, it is my intention to ask very specific questions about every factual allegation included in every claim brought by Mr. Edwards on behalf of every victim in every case in which it is alleged that Mr. Edwards has abusively prosecuted that claim.

I want to know about the connection between Mr. Epstein and each one of those alleged victims. I want to know about every individual who had information concerning the events that are alleged in those complaints, every individual who was in a position to have possibly had information about the events alleged in those complaints.

I want to ask this witness about every person whose deposition was taken and scheduled to be taken, the relationship of those persons to Mr. Epstein, knowledge that those persons may have with respect to Mr. Epstein's activities with minors, other crimes committed by Mr. Epstein as part of an ongoing and continuous course of conduct supportive of claims for punitive damages against Mr. Epstein and supportive of RICO claims against him.

And had this deposition been permitted to continue, we would have covered each of those areas and substantially more.

*Questions asked before by Mr. Scarola in March 17, 2010 Deposition of Jeffrey Epstein.

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO. 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually,
and L.M., individually,

Defendant(s).

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

January 25, 2012
9:34 a.m. - 10:03 a.m.

SEARCY, DENNEY, SCAROLA, BARNHART & SHIPLEY, PA
2139 Palm Beach Lakes Boulevard
West Palm Beach Florida 33409

Stenographically Reported By:
Tammy Nestor, RPR

APPEARANCES:**ON BEHALF OF PLAINTIFF:**

JACK SCAROLA, ESQUIRE
SEARCY, DENNEY, SCAROLA
BARNHART & SHIPLEY, PA
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409

ON BEHALF OF DEFENDANT:

CHRISTOPHER E. KNIGHT, ESQUIRE
JOSEPH L. ACKERMAN, JR., ESQUIRE
FOWLER WHITE BURNETT, PA
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New York, New York 10065

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EXAMINATION:

PAGE

By Mr. Scarola

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E X H I B I T S
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EXHIBIT

DESCRIPTION

PAGE

1 Third Amended Complaint in LM v. Epstein

16

13 And will the counsel please announce
14 appearances for the record.

18 **MR. KNIGHT:** Christopher Knight on behalf
19 of Jeffrey Epstein.

1 JEFFREY EPSTEIN

2 Was called as a witness and after being duly sworn on oath was
3 examined and testified as follows:

4 EXAMINATION

5 BY MR. SCAROLA:

6 Q Would you please state your full name and
7 your current residence address?

8 A I'm Jeffrey Edward Epstein. And my
9 residence address is 6100 Red Hook Boulevard in
10 Virgin Islands.

11 Q Do you maintain any other residences
12 presently?

13 A I have vacation homes in New Mexico, Palm
14 Beach, New York, and Paris.

15 Q Would you give us the address of each,
16 please.

17 A Yes. New York is 9 East 71st Street. New
18 Mexico is Zorro Ranch Road. Paris is 22 Avenue
19 Foch, F-O-C-H. And where else? Palm Beach is 358
20 El Brillo Way.

21 THE VIDEOGRAPHER: Pardon me, sir.

22 THE WITNESS: Yes.

23 THE VIDEOGRAPHER: Excuse me. Do you have
24 your mike on? Thanks.

25

1 **BY MR. SCAROLA:**

2 **Q Do you now or have you ever had a sexual**
3 **addiction?**

4 **MR. KNIGHT:** I'm going to instruct him not
5 to answer the question. That's outside of the
6 area of this abuse of process lawsuit.

7 And just to let you know, he's here to
8 answer all the questions you want relative to
9 the abuse of process. The judge has been pretty
10 clear relative to the discovery regarding any of
11 the prior sexual allegations, et cetera. And
12 just so we don't waste your time or our time,
13 I'll be consistent on that per what the judge
14 has previously discussed regarding discovery.

15 **MR. SCAROLA:** Well, you and I have a very
16 different understanding of what the court's
17 prior rulings have been. But we'll let the
18 court deal with that.

19 **BY MR. SCAROLA:**

20 **Q Do you now or have you ever had a sexual**
21 **preference for minors?**

22 **MR. KNIGHT:** Same.

23 **BY MR. SCAROLA:**

24 **Q Have you ever acted on a sexual preference**
25 **for minors?**

1 MR. KNIGHT: Same.

2 BY MR. SCAROLA:

3 Q Have you ever informed anyone other than
4 your legal counsel that you have a sexual preference
5 for minors?

6 MR. KNIGHT: Same.

7 BY MR. SCAROLA:

8 Q Have you ever informed anyone other than
9 your legal counsel that you have acted on a sexual
10 preference for minors?

11 MR. KNIGHT: Same.

12 BY MR. SCAROLA:

13 Q Have you ever sought or received
14 evaluation, counseling, or treatment for any form of
15 sexual addiction?

16 MR. KNIGHT: Same.

17 BY MR. SCAROLA:

18 Q Have you ever sought or received
19 evaluation, counseling, or treatment for any
20 sex-related issue?

21 MR. KNIGHT: Same.

22 BY MR. SCAROLA:

23 Q Have you ever retained the services of a
24 consultant to assist in changing your public image
25 following your arrest on sex-related charges?

1 MR. KNIGHT: Same.

2 BY MR. SCAROLA:

3 Q Have you ever discussed with anyone
4 undertaking an effort to change your public image
5 following your arrest for and conviction of a
6 sex-related crime?

7 MR. KNIGHT: Same.

8 BY MR. SCAROLA:

10 A Yes.

11 Q What was the crime of which you were
12 convicted?

15 Q Did you, in fact, commit those acts?

22 BY MR. SCAROLA:

23 Q How many times have you solicited for
24 prostitution?

25 A I'm going invoke my Fifth Amendment right.

1 **Q How many times have you solicited a minor**
2 **for prostitution?**

3 **A Same answer.**

4 **Q How many times have you solicited for**
5 **prostitution in the State of Florida?**

6 **A Same answer.**

7 **Q How many times have you solicited a minor**
8 **for prostitution in the State of Florida?**

9 **A Same answer.**

10 **Q How many times have you solicited for**
11 **prostitution in the Virgin Islands?**

12 **MR. KNIGHT:** Can we stop it here just for
13 a second? Can we go off the record for one
14 minute?

15 **THE VIDEOGRAPHER:** The time is 9:39. We
16 are going off the record.

17 (Thereupon, a discussion was held off the
18 record.)

19 **MR. SCAROLA:** I would like you to take it
20 down, please.

21 **MR. KNIGHT:** Fine.

22 **MR. SCAROLA:** And we'll go back on the
23 record. Thank you.

24 **THE VIDEOGRAPHER:** Stand by.

25 **MR. KNIGHT:** I'm wondering if you have any

1 intention to ask any questions, and you may be,
2 any questions outside of this clearly harassing
3 area relative to issues that are outside of the
4 four corners of the complaint or whether this
5 is just going to be a continuance of questions
6 of this witness that have no other means of
7 advancing this lawsuit but only have means of
8 doing other things of which I won't -- I don't
9 care to list them here. Do you plan to go into
10 other areas?

11 **MR. SCAROLA:** I am -- I am planning on
12 taking a very thorough and comprehensive
13 deposition of Mr. Epstein.

14 **MR. KNIGHT:** Are you asking -- planning to
15 ask any questions that are not sexual or
16 criminal in nature?

17 **MR. SCAROLA:** Oh, I'm sure there will be
18 many that you would probably not consider
19 sexual or criminal in nature, but I don't know.

20 **MR. KNIGHT:** Let's proceed for a little
21 while, see what we can do, because certainly we
22 have taken the time out to come up here,
23 people's schedules have been made, et cetera,
24 people have traveled long distances, but we may
25 have to quit and go to the court.

1 BY MR. SCAROLA:

2 Q Have you ever solicited for prostitution
3 in the Virgin Islands?

4 A Same answer.

5 Q That is that the -- you are invoking your
6 Fifth Amendment --

7 A Yes.

8 Q -- right?

9 A Yes, Mr. Scarola.

10 Q Have you ever solicited for prostitution
11 in New York?

12 A Same answer.

13 Q Have you ever solicited for prostitution
14 in new Mexico?

15 A Same answer.

16 Q Have you ever solicited for prostitution
17 in Paris?

18 A Same answer.

19 Q Have you ever solicited for prostitution
20 anywhere at any time?

21 A Same answer.

22 Q Have you ever solicited a minor for
23 prostitution anywhere at any time?

24 A Same answer.

25 Q Who is the prostitute that you solicited

1 **for prostitution with respect to the claim on which**
2 **you were convicted?**

3 A Same answer.

4 Q Who is the minor that you solicited for
5 prostitution with respect to the claim on which you
6 pled guilty?

7 A Same answer.

8 Q Did you, in fact, plead guilty to
9 soliciting for prostitution?

10 MR. KNIGHT: Asked and answered.

11 THE WITNESS: Yes, sir.

12 BY MR. SCAROLA:

13 Q Did you, in fact, plead guilty to
14 soliciting a minor for prostitution?

15 A No.

16 Q Where was it that you solicited for
17 prostitution in the manner -- in the matter in which
18 you pled guilty?

19 A Same answer.

20 Q When was it that you solicited for
21 prostitution in the matter in which you pled guilty?

22 A Same answer.

23 Q Have you ever discussed your sex-related
24 arrest or conviction with any reporter or news media
25 representative?

1 **MR. KNIGHT:** I'm going to instruct you not
2 to answer the question.

3 **MR. SCAROLA:** And what is the basis of
4 that instruction?

5 **MR. KNIGHT:** What is the basis?

6 **MR. SCAROLA:** Yes.

7 **MR. KNIGHT:** What does it have to do with
8 this lawsuit? It's for no other reason other
9 than to harass him. There are plenty of areas
10 you can go into which are reasonable. We are
11 here.

12 **MR. SCAROLA:** So the objection is
13 relevancy, is that correct?

14 **MR. KNIGHT:** No, it goes beyond relevancy.

15 **MR. SCAROLA:** Well, what is it then?

16 **MR. KNIGHT:** Well, it is harassing. It is
17 used -- it is being used to intimidate the
18 witness. It is being used for various
19 different reasons. And I believe it is
20 improper.

21 **BY MR. SCAROLA:**

22 Q **Have you ever discussed your sex-related**
23 **activities with minors in the State of Florida with**
24 **any reporter or news media representative?**

25 **MR. KNIGHT:** Same instruction. We are

1 going to take a quick break if we can go off
2 the record.

5 (Thereupon, a recess was taken at
6 9:43 a.m.)

12 Relative to your question earlier and the
13 instruction not to answer, I do believe it was
14 appropriate, but I'm going to have
15 Mr. Goldberger address what he believes the --
16 is the -- our client is entitled to, but at the
17 same time, there are other issues we want to put
18 on the record.

19 I will allow you to ask more questions, but
20 if it's going to stay on this line, we may have
21 to adjourn.

1 or may not have had with, I believe you couched
2 it as news reporters or news media, he would be
3 invoking Fifth Amendment privileges as to those
4 questions in addition to the objection raised
5 by Mr. Knight.

6 **MR. KNIGHT:** I'm withdrawing the
7 instruction.

8 **MR. GOLDBERGER:** Okay. All right. Anyhow
9 he's invoking Fifth Amendment privileges as to
10 that line of questioning.

11 As to the total line of questioning where
12 you are asking Mr. Epstein about sex-related
13 issues, as you know, your client, Mr. Edwards,
14 has filed a lawsuit in federal court where he is
15 seeking to overturn the non-prosecution
16 agreement that Mr. Epstein is a party to.

17 I believe that you are asking these
18 questions in an effort to further Mr. Edwards'
19 attempts to set aside that non-prosecution
20 agreement, and I think it serves no purpose
21 other than to assist your client in that
22 lawsuit. And I just think it's totally outside
23 the realm of the discovery that is allowed in
24 this case. And I'm simply not going to allow my
25 client to answer those questions given the fact

1 that your client has filed an action to set
2 aside the non-prosecution agreement that
3 Mr. Epstein is a party to.

4 **MR. SCAROLA:** Would you please mark this
5 as Exhibit No. 1 to this deposition.

6 **MR. KNIGHT:** As soon as you get the
7 sticker on it, I'll look at that one.

8 (Thereupon, Deposition Exhibit No. 1 was
9 marked for identification.)

10 **THE VIDEOGRAPHER:** Is someone's phone by a
11 microphone or in their pocket?

12 **MR. GOLDBERGER:** I am.

13 **THE VIDEOGRAPHER:** If you can put it to
14 the side, please.

15 **MR. GOLDBERGER:** I'm all the way over
16 here.

17 **MR. KNIGHT:** Mine is off.

18 **MR. GOLDBERGER:** I'll shut it off.

19 **MR. KNIGHT:** Okay. Thank you.

20 **BY MR. SCAROLA:**

21 Q **You have been handed a copy of what's been
22 marked as Exhibit No. 1 to this deposition. It is a
23 copy of Plaintiff's Third Amended Complaint in a
24 case styled LM versus Jeffrey Epstein.**

25 **Have you seen this document before?**

1 A Not to the best of my recollection, no.

2 Q **Do you recall having been sued by Bradley**
3 **Edwards on behalf of an individual who was**
4 **identified by the initials LM?**

5 A Yes, sir.

6 Q **And is this one of the cases that you**
7 **contend was abusively prosecuted by Bradley Edwards?**

8 A I'm not sure if this is the exact
9 complaint.

10 Q **Well, is this the case?**

11 A I don't know.

12 Q **Which case is it that you contend Bradley**
13 **Edwards abusively prosecuted against you?**

14 A It was the LM case. I don't know if this
15 is the specific case.

16 Q **Well, I want you to assume that there was**
17 **only one LM case that was filed by Bradley Edwards**
18 **against you.**

19 A That's correct.

20 Q **Do you have any recollection that is at**
21 **odds with that assumption?**

22 A Yes, I do.

23 Q **You have a recollection that there was, in**
24 **fact, a federal court case as well as a state court**
25 **case, correct?**

1 A Correct.

2 Q All right. Now, is it your --

3 A I believe that's --

4 Q Is it your contention --

5 MR. KNIGHT: Finish your answer. Did you
6 finish your answer?

7 THE WITNESS: That's all right.

8 BY MR. SCAROLA:

9 Q Is it your contention that Bradley --

10 MR. KNIGHT: And any time you want to
11 finish your answer, please do so.

12 THE WITNESS: Sure.

13 BY MR. SCAROLA:

14 Q Is it your contention that Bradley Edwards
15 abusively prosecuted the state court case on behalf
16 of LM?

17 A I don't know. Sorry.

18 Q Is it your contention that Bradley Edwards
19 abusively prosecuted the federal court case on
20 behalf of LM?

21 MR. KNIGHT: Objection, asks for legal
22 conclusions. Obviously there were lawsuits
23 that were raised in this case.

24 MR. SCAROLA: You don't need to make a
25 speaking objection --

1 **MR. KNIGHT:** Okay.
2 **MR. SCAROLA:** -- that's intended to coach
3 the witness, Mr. Knight.

4 **MR. KNIGHT:** I'm going to object.

5 **MR. SCAROLA:** So if you say you are
6 objecting on the basis that it calls for a
7 legal conclusion, that's fine. And now I would
8 like the witness's answer unless you are
9 instructing him not to answer.

10 **MR. KNIGHT:** I'm not instructing him not
11 to answer.

12 **BY MR. SCAROLA:**

13 **Q** Okay. Then would you please answer the
14 question?

15 **A** I'm sorry. Would you repeat it?

16 **Q** Yes, sir. Is it your contention that
17 **Bradley Edwards abusively prosecuted the federal**
18 **court action on behalf of LM?**

19 **A** Yes, sir.

20 **Q** How?

21 **A** Bradley Edwards filed a 234-count federal
22 complaint in conjunction with his partner Scott
23 Rothstein to enable his partners at RRA to defraud
24 south Florida investors of millions of dollars.

25 His partner Scott Rothstein and his partner

1 Mr. Adler have -- excuse me, Mr. Rothstein has now in
2 deposition admitted that they needed to file a complaint to
3 show investors that there was real action, in
4 Mr. Rothstein's words, going on in federal court. The
5 investors had not been able to find a filed complaint and
6 had complained to Mr. Rothstein that there was no filed
7 complaints two days, excuse me, before Mr. Edwards filed
8 the federal complaint for 234.

9 **Q Were you ever served with that complaint?**

10 A Not to the best of my recollection.

11 **Q So one contention is that Mr. Edwards**
12 **abusively prosecuted a federal court action on**
13 **behalf of LM with which you were never served,**
14 **correct?**

15 A I had -- I was notified that the case was,
16 in fact, filed.

17 **Q But you were never served with the case,**
18 **correct?**

19 A I was notified that the case was filed.

20 **Q But you were never served with the case,**
21 **correct?**

22 A Not to the best of my recollection.

23 **Q Okay. What damage did you incur as a**
24 **consequence of the filing of a complaint with which**
25 **you were never served?**

1 A I incurred many legal -- much legal fees,
2 many legal fees, in fact, to try to figure out
3 why -- what was going on and, in fact, getting
4 prepared to defend the case though I had not yet
5 been served.

6 **Q Were the allegations in the federal**
7 **complaint on behalf of LM any different than the**
8 **allegations in the state court case on behalf of LM?**

9 A I don't recall.

10 **Q Did you, in fact, engage in any sexual**
11 **conduct with LM?**

12 A I'm sorry, but I'm sure -- the jury is
13 going to recognize this is simply meant to harass
14 me, and I'll have to take the Fifth Amendment since
15 your client, Mr. Edwards, is trying to overturn my
16 prosecution agreement.

17 **Q How many times did you engage in sexual**
18 **conduct with LM?**

19 A I'm going to have to invoke my Fifth
20 Amendment right again, sir.

21 **Q Do you know who LM is?**

22 A Again I'm going to assert my right.

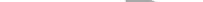
23 **MR. KNIGHT:** We are going to go off the
24 record and take another break.

25 **THE VIDEOGRAPHER:** The time is 9:58. We

1 are going off the record.

2 (Thereupon, a recess was taken at
3 9:58 a.m.)

13 As such, we are going to recess and ask
14 further direction from the court on what is
15 allowable and what is not allowable in this
16 deposition.

17  **MR. SCAROLA:** So you are terminating the
18 deposition at this time?

19 MR. KNIGHT: We are recessing the
20 deposition to get direction from the court.

21 MR. SCAROLA: Until when?

22 **MR. KNIGHT:** We will find out what the
23 court says.

1 **MR. KNIGHT:** I am not. We are going to
2 file an appropriate motion and we are going to
3 take it to the judge and see what he does.
4 Thank you.

5 **MR. SCAROLA:** So that the record is clear,
6 it is my intention to ask very specific
7 questions about every factual allegation
8 included in every claim brought by Mr. Edwards
9 on behalf of every victim in every case in
10 which it is alleged that Mr. Edwards has
11 abusively prosecuted that claim.

12 I want to know about the connection between
13 Mr. Epstein and each one of those alleged
14 victims. I want to know about every individual
15 who had information concerning the events that
16 are alleged in those complaints, every
17 individual who was in a position to have
18 possibly had information about the events
19 alleged in those complaints.

20 I want to ask this witness about every
21 person whose deposition was taken and scheduled
22 to be taken, the relationship of those persons
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24 have with respect to Mr. Epstein's activities
25 with minors, other crimes committed by

1 Mr. Epstein as part of an ongoing and continuous
2 course of conduct supportive of claims for
3 punitive damages against Mr. Epstein and
4 supportive of RICO claims against him.

5 And had this deposition been permitted to
6 continue, we would have covered each of those
7 areas and substantially more.

8 **MR. KNIGHT:** Thank you.

9 **THE VIDEOGRAPHER:** The time is 10:03. We
10 are going off the record.

11 (Thereupon, the deposition was adjourned at
12 10:03 a.m.)

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CERTIFICATE OF REPORTER

STATE OF FLORIDA

COUNTY OF BROWARD

I, TAMMY NESTOR, Registered Professional Reporter, do hereby certify that I was authorized to and did stenographically report the foregoing deposition of JEFFREY EPSTEIN, that a review of the transcript was requested, and that the transcript is a true record of my stenographic notes

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 25th day of January 2012.

TAMMY NESTOR, RPR

CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF BROWARD

I, the undersigned authority, certify that
JEFFREY EPSTEIN personally appeared before me and was
duly sworn.

Witness my hand and official seal this 25th
day of January 2012.

Tammy Nestor, Court Reporter
Notary Public, State of Florida
Commission No.: EE 133933
Commission Exp. Date: 10/23/2015

January 25, 2012

FOWLER WHITE BURNETT, PA
1395 Brickell Avenue, 14th Floor
Miami, Florida 33131
ATTN: CHRISTOPHER E. KNIGHT, ESQUIRE

Re: Epstein v Edwards
Case No. 502009CA040800XXXXMBAG

Please take notice that on the January 25, 2012, you gave your deposition in the above cause. At that time you did not waive your signature. The transcript is now available for your review.

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If you do not read and sign the deposition within thirty (30) days, the original, which has already been forwarded to the ordering attorney, may be filed with the Clerk of the Court.

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Very truly yours,

TAMMY NESTOR, RPR
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I do hereby waive my signature.

JEFFREY EPSTEIN

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In Re: Epstein v Edwards
Case No. 502009CA040800XXXXMBAG
JEFFREY EPSTEIN
January 25, 2012

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Under penalties of perjury, I declare that I have read
the foregoing document and that the facts stated in it
are true.

23

24

DATE

JEFFREY EPSTEIN

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IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: 50 2008 CA 028051 XXXXMB AB

L.M.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

PLAINTIFF'S THIRD AMENDED COMPLAINT

Plaintiff, L.M., by and through her undersigned counsel, sues the Defendant, Jeffrey Epstein, and alleges:

GENERAL ALLEGATIONS AS TO ALL COUNTS

1. This is an action in an amount in excess of \$15,000.00, exclusive of interest and costs and is within the jurisdictional limits of this Court.
2. This Complaint is brought under a fictitious name in order to protect the identity of the plaintiff because this Complaint makes allegations of a sensitive sexual nature.
3. At all times material to this cause of action, the plaintiff, L.M. (hereinafter referred to as "Plaintiff"), was a resident of Palm Beach County, Florida.
4. At all times material to this cause of action, Defendant, Jeffrey Epstein, had a residence located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida.



5. Defendant, Jeffrey Epstein, is currently a citizen of the State of Florida, as he currently resides at 358 El Brillo Way, West Palm Beach, Florida where he is currently under community control as a condition of his sentence in criminal case number 06CF009454AMB.

6. At all times material to this cause of action, Defendant, Jeffrey Epstein, was an adult male born in 1953.

7. All of the allegations within this Complaint occurred in West Palm Beach, Florida.

8. Upon information and belief, Defendant, Jeffrey Epstein, has demonstrated a sexual preference and obsession for minor girls.

9. Defendant, Jeffrey Epstein, along with numerous assistants, developed a plan, scheme, and criminal enterprise that included an elaborate system wherein the then minor Plaintiff was brought to Defendant Jeffrey Epstein's residence by the Defendant's employees, recruiters, and assistants. When the assistants and employees left the then minor Plaintiff and other minor girls alone in a room at the defendant's mansion, Defendant, Jeffrey Epstein, himself would appear, remove his clothing, and direct the then minor Plaintiff to remove her clothing. He would then perform one or more lewd, lascivious, and sexual acts, including, but not limited to, masturbation, touching of the then minor Plaintiff's sexual organs, using vibrators or sexual toys on the then minor Plaintiff, coercing the then minor Plaintiff into sexual acts with himself or others, and digitally penetrating the then minor Plaintiff. He would then pay the plaintiff for engaging in this sexual activity.

10. The plaintiff was first brought to Defendant, Jeffrey Epstein's mansion in 2002 when she was a thirteen or fourteen-year old.

11. The then minor Plaintiff was a vulnerable child without adequate parental support at all times material to this Complaint. The defendant, Jeffrey Epstein, a wealthy financier with a lavish home, significant wealth, and a network of assistants and employees, used his resources and his influence over a vulnerable minor child to engage in a systematic pattern of sexually exploitive behavior.

12. Beginning in approximately July 2002 and continuing until approximately September 2005, Defendant, Jeffrey Epstein, coerced, induced and/or enticed the impressionable, vulnerable, and economically deprived then minor Plaintiff to commit various acts of sexual misconduct. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then minor Plaintiff, forcing or inducing the then minor Plaintiff into sexual misconduct, masturbation of Defendant, Jeffrey Epstein, in the presence of the then minor Plaintiff, handling and fondling of the then minor Plaintiff's sexual organs, and encouraging the then minor Plaintiff to become involved in prostitution; Defendant, Jeffrey Epstein, committed numerous criminal sexual offenses against the then minor Plaintiff including, but not limited to, sexual battery, solicitation of prostitution, molestation, coercing a minor into prostitution, contributing to the delinquency of a minor, and the commission of lewd and lascivious acts upon the person of the then minor Plaintiff.

13. In addition to the direct sexual abuse and molestation of the then minor Plaintiff, Defendant, Jeffrey Epstein, instructed, coerced and otherwise induced the then

minor Plaintiff to bring him numerous other minor children for the purposes of further satisfying his deviant sexual attraction to minors. Defendant, Jeffrey Epstein, used his money, wealth and power to unduly and improperly manipulate and influence the then minor Plaintiff to bring him these other minor girls in exchange for money. This influence led the then minor Plaintiff away from the life of an adolescent teenage child and into a delinquent lifestyle.

14. The above-described acts took place in Palm Beach County, Florida at the residence of the Defendant, Jeffrey Epstein. Any assertions by Defendant, Jeffrey Epstein, that he was unaware of the age of the then minor Plaintiff are belied by his actions and rendered irrelevant by the provisions of applicable Florida Statutes concerning the sexual exploitation and abuse of a minor child. The defendant, Jeffrey Epstein, at all times material to this cause of action, knew and should have known of the Plaintiff's minority.

15. The above-described acts were perpetrated upon the person of the then minor Plaintiff on numerous occasions.

COUNT I
Negligence Per Se, violation of criminal statutes

16. The plaintiff adopts and realleges paragraphs 1 through 15 above.

17. Defendant, Jeffrey Epstein, negligently injured Plaintiff, and/or failed to understand or appreciate that his conduct as alleged herein would injure Plaintiff, on numerous occasions between approximately July 2002 and approximately September 2005.

18. In acting in the manner described in paragraphs 1 through 15, Defendant, Jeffrey Epstein, violated a duty to refrain from committing criminal actions against Plaintiff that proximately caused damages to Plaintiff.

19. In committing various crimes against Plaintiff, Defendant violated penal statutes that were designed to protect a class of persons, of which Plaintiff is a member, against a particular type of harm.

20. Particularly, the Florida Statutes which Epstein violated include, but may not be limited to:

A. Chapter 800.04(4-7) – Lewd or lascivious offenses; Defendant Epstein engaged in sexual activity with Plaintiff when Plaintiff was less than 16 years of age, and also encouraged or enticed her at that time to become involved in prostitution or some other act of sexual activity; Defendant also violated this statute by touching in a lewd or lascivious manner the breasts, genitals, genital area or buttocks, or the clothing covering them, of Plaintiff at a time when Plaintiff was less than 16 years old, or enticed Plaintiff at that time to so touch Epstein. Epstein masturbated in the presence of Plaintiff when Plaintiff was less than 16 years of age.

B. Section 827.04 – Contributing to the delinquency of a child; Defendant induced or endeavored to induce by act, threat, command, or persuasion, the then minor Plaintiff to commit or perform acts, follow a course of conduct, and live in a manner that caused or tended to cause Plaintiff to become or remain delinquent, when he committed the acts described in paragraphs 12-15 above against Plaintiff.

C. Section 796.03 – Procuring a minor for prostitution; Defendant procured for prostitution, or caused to be prostituted, Plaintiff when Plaintiff was under the age of 18.

D. Section 796.07 – Prohibiting prostitution; Defendant owned, maintained and operated a place, to wit: his home located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida, for the purpose of lewdness or prostitution, he received minors into his house for the purpose of lewdness or prostitution, and directed, took, transported, or offered or agreed to transport Plaintiff to and from his house with the reasonable belief that the purpose of such directing, taking, or transporting was lewdness or prostitution;

E. Section 796.045 – Sex trafficking; Defendant knowingly recruited, enticed, harbored, transported, or obtained Plaintiff, knowing that coercion would be used to cause Plaintiff to engage in prostitution;

F. Section 796.04 – Forcing, compelling, or coercing another to become a prostitute; Defendant coerced Plaintiff to become a prostitute; and

G. Section 39.01 (67) – Sexual abuse of a child; Defendant intruded into the genitals of Plaintiff, when Plaintiff was a child, and touched her genitals or intimate parts, he intentionally masturbated in front of her, he intentionally exposed his genitals in her presence, and encouraged Plaintiff to engage in prostitution.

21. As to each of the above referenced criminal statutes, Plaintiff was a member of the class of persons intended to be protected, the injury was of the type the

statute intended to protect, and the injuries suffered by Plaintiff proximately resulted from the violation of the criminal statute.

22. As a direct and proximate result of Defendant, Jeffrey Epstein's acts on Plaintiff, the plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the plaintiff will in the future suffer additional medical and psychological expenses. The plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the plaintiff, L.M., demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT II
Intentional Sexual Tort Per Se In Violation of Criminal Statutes

23. The plaintiff adopts and realleges paragraphs 1 through 15 above.
24. Defendant, Jeffrey Epstein, intentionally injured Plaintiff sexually on numerous occasions between approximately July 2002 and approximately September

2005, and further sexually exploited her and contributed to her delinquency during that time.

25. In sexually abusing, battering and exploiting Plaintiff in the manner described in paragraphs 1 through 15, Defendant, Jeffrey Epstein, violated a duty to refrain from committing criminal actions against Plaintiff that proximately caused damages to Plaintiff.

26. In committing various crimes against Plaintiff, Defendant violated penal statutes that were designed to protect a class of persons, of which Plaintiff is a member, against a particular type of harm.

27. Particularly, the Florida Statutes which Epstein violated include, but may not be limited to:

A. Chapter 800.04(4-7) – Lewd or lascivious offenses; Defendant Epstein engaged in sexual activity with Plaintiff when Plaintiff was less than 16 years of age, and also encouraged or enticed her at that time to become involved in prostitution or some other act of sexual activity; Defendant also violated this statute by touching in a lewd or lascivious manner the breasts, genitals, genital area or buttocks, or the clothing covering them, of Plaintiff at a time when Plaintiff was less than 16 years old, or enticed Plaintiff at that time to so touch Epstein. Epstein masturbated in the presence of Plaintiff when Plaintiff was less than 16 years of age.

B. Section 827.04 – Contributing to the delinquency of a child; Defendant induced or endeavored to induce by act, threat, command, or persuasion, the then minor Plaintiff to commit or perform acts, follow a course of conduct, and live in

a manner that caused or tended to cause Plaintiff to become or remain delinquent, when he committed the acts described in paragraphs 12-15 above against Plaintiff.

C. Section 796.03 – Procuring a minor for prostitution; Defendant procured for prostitution, or caused to be prostituted, Plaintiff when Plaintiff was under the age of 18.

D. Section 796.07 – Prohibiting prostitution; Defendant owned, maintained and operated a place, to wit: his home located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida, for the purpose of lewdness or prostitution, he received minors into his house for the purpose of lewdness or prostitution, and directed, took, transported, or offered or agreed to transport Plaintiff to and from his house with the reasonable belief that the purpose of such directing, taking, or transporting was lewdness or prostitution;

E. Section 796.045 – Sex trafficking; Defendant knowingly recruited, enticed, harbored, transported, or obtained Plaintiff, knowing that coercion would be used to cause Plaintiff to engage in prostitution;

F. Section 796.04 – Forcing, compelling, or coercing another to become a prostitute; Defendant coerced Plaintiff to become a prostitute; and

G. Section 39.01 (67) – Sexual abuse of a child; Defendant intruded into the genitals of Plaintiff, when Plaintiff was a child, and touched her genitals or intimate parts, he intentionally masturbated in front of her, he intentionally exposed his genitals in her presence, and encouraged Plaintiff to engage in prostitution.

28. As to each of the above referenced criminal statutes, Plaintiff was a member of the class of persons intended to be protected, the injury was of the type the statute intended to protect, and the injuries suffered by Plaintiff proximately resulted from the violation of the criminal statute.

29. As a direct and proximate result of Defendant, Jeffrey Epstein's criminal acts on Plaintiff, the plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor plaintiff incurred medical and psychological expenses and the plaintiff will in the future suffer additional medical and psychological expenses. The plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff will continue to suffer these losses in the future.

WHEREFORE, the plaintiff, L.M., demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT III
Cause of Action Pursuant to Florida Statute 796.09
Against Defendant, Jeffrey Epstein

30. The plaintiff adopts and realleges paragraphs 1 through 15 above.

31. The allegations contained herein in Count II are a separate and distinct legal remedy.

32. Defendant, Jeffrey Epstein, was a wealthy and powerful man, and Plaintiff was an economically disadvantaged and impressionable minor.

33. Defendant, Jeffrey Epstein, used his vast wealth and power to coerce Plaintiff into prostitution and/or coerced her to remain in prostitution.

34. Defendant, Jeffrey Epstein, coerced Plaintiff into prostitution in one or more of the following ways:

- A. Domination of her mind and body through exploitive techniques;
- B. Inducement;
- C. Promise of greater financial rewards;
- D. Exploitation of a condition of developmental disability, cognitive limitation, affective disorder, and/or substance dependency;
- E. Exploitation of human needs for food, shelter or affection;
- F. Exploitation of underprivileged and vulnerable economic condition or situation;
- G. Use of a system of recruiting other similarly situated minor girls to further coerce and induce Plaintiff into the lifestyle of prostitution; and
- H. Exploitation through demonstration of abundant wealth and power to impress a young and vulnerable then minor Plaintiff and to coerce her into prostitution.

35. As a direct and proximate result of the offenses committed by Defendant, Jeffrey Epstein, against Plaintiff pursuant to Florida Statutes §796.09, the plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the plaintiff will in the future suffer additional medical and psychological expenses. The plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the plaintiff, L.M., demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT IV
Intentional Infliction of Emotional Distress
Against Defendant, Jeffrey Epstein

36. The plaintiff adopts and realleges paragraphs 1 through 15 above.

37. The defendant, Jeffrey Epstein's conduct towards the then minor plaintiff was intentional and reckless and was outrageous in character, and so extreme in degree, going beyond all bounds of decency.

38. The defendant, Jeffrey Epstein's intentional, deliberate and reckless conduct caused severe emotional distress to the plaintiff. Defendant, at the time he committed these numerous sexual assaults on Plaintiff, had a specific intent to harm the then minor Plaintiff and his conduct did so harm the plaintiff.

39. As a direct and proximate result of the defendant, Jeffrey Epstein's intentional and reckless conduct, the plaintiff has in the past suffered and in the future will continue to suffer physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with the defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the plaintiff will in the future suffer additional medical and psychological expenses. The plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff will continue to suffer these losses in the future.

WHEREFORE, the plaintiff, L.M., demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT IV
Battery

40. The plaintiff, L.M., repeats and realleges paragraphs 1 through 15 above.

41. On numerous occasions, Defendant Epstein did in fact intentionally touch Plaintiff, L.M., on her person against her will and/or without her legal consent.

42. Defendant Epstein battered Plaintiff sexually, in that he touched her in intimate areas of her body and person in an offensive manner while she was a minor child, and therefore the touchings were without legal consent.

43. Defendant Epstein touched her in intimate areas of her body on dozens of occasions between approximately July 2002 and September 2005.

44. The conduct described in this count constitutes battery against the person of the then minor Plaintiff.

45. As a direct and proximate result of Defendant, Jeffrey Epstein's battery on Plaintiff, the plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of her childhood, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and Plaintiff will in the future suffer additional medical and psychological expenses. Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the

future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and Plaintiff will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been provided this *26th* day of May 2010 via U.S. Mail and email transmittal to all those on the attached service list.

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By: *[Signature]*
**BRADLEY J. EDWARDS
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