

CASE NO.: 08-CV-80119-MARRA/JOHNSON

# **EXHIBIT A**



IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO. 2006 CP09454AXX

STATE OF FLORIDA,

-VS-

JEFFREY EPSTEIN,  
Defendant.

DEPOSITION OF [REDACTED]

Wednesday, February 20, 2008

2:00 p.m. - 4:30 p.m.

Palm Beach County Courthouse

205 North Dixie Highway

West Palm Beach, Florida 33401

**COPY**

Reported By:  
Judith F. Consor, FPR  
Notary Public, State of Florida  
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APPEARANCES:

On behalf of the State:  
LANNA BELOHLAVEK, ESQ.  
ASSISTANT STATE ATTORNEY  
401 North Dixie Highway  
West Palm Beach, Florida 33401  
561.355.7100

On behalf of the Defendant:  
MICHAEL R. TEIN, ESQ.  
KATHRYN A. MEYERS, ESQ.  
LEWIS TEIN, PL  
3059 GRAND AVENUE, SUITE 340  
COCONUT GROVE, FL 33133

On behalf of the Defendant:  
JACK A. GOLDBERGER, ESQ.  
ATTERBURY, GOLDBERGER & WEISS  
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SUITE 1400  
WEST PALM BEACH, FLORIDA 33401  
561.659.8300

ALSO PRESENT:

ON BEHALF OF THE WITNESS: THEODORE J. LEOPOLD, ESQ.  
KEITH J. BRETT, DIRECTOR OF MULTIMEDIA DIVISION,  
LEGAL-EZE

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WITNESS:

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DIRECT EXAMINATION

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BY MR. TEIN:

NO EXHIBITS MARKED

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Deposition taken before Judith F. Consor,  
Court Reporter and Notary Public in and for the State of  
Florida at Large, in the above cause.

Thereupon,

having been first duly sworn or affirmed, was examined  
and testified as follows:

THE WITNESS: I do.

DIRECT EXAMINATION

BY MR. TEIN:

Q. Good afternoon. Please tell me your full  
name.

A. [REDACTED]

Q. And can you please spell it.

A. [REDACTED]

Q. Thank you.

May I call you [REDACTED]

A. Uh-huh.

Q. [REDACTED] I'm going to ask you a few  
questions, several questions today. If at any time you  
want to take a break, you just let me know. Okay?

A. Okay.

Q. If you at any time don't understand one of

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1 my questions, will you just please let me know?

2 A. Yes.

3 Q. And if at any time you're not feeling well

4 or something like that, you'll tell us, right?

5 A. Yes.

6 Q. Do you feel okay today?

7 A. Yes.

8 Q. Not taking any alcohol or drugs or anything

9 like that, right?

10 A. No.

11 Q. So you feel ready to have your deposition

12 taken?

13 A. Yes.

14 Q. [REDACTED] what is your address?

15 A. I'm currently living at my aunt's house and

16 I don't know it off the top of my head.

17 Q. Where is it?

18 A. In Jupiter.

19 Q. Who is your aunt?

20 A. [REDACTED]

21 Q. Who else is living there?

22 A. [REDACTED] my uncle.

23 Q. Anyone else living there?

24 A. No.

25 Q. The contempt motion that your mother filed

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1 against your father regarding your fifty million-dollar

2 lawsuit against Jeffrey Epstein says that you live with

3 your aunt and uncle and have been living there; is that

4 correct?

5 A. Yes.

6 Q. How long have you been living with your

7 aunt and uncle?

8 A. Since my father kicked me out.

9 Q. That was Thanksgiving of this past year?

10 A. Yes, sir.

11 Q. Okay. Didn't your firefighter boyfriend

12 [REDACTED] get an apartment for the two of you?

13 A. No, sir. He has an apartment, but by

14 himself.

15 Q. Did he get an apartment for the two of you

16 to live in?

17 A. No, sir.

18 Q. Are you planning to move in with him?

19 A. Maybe one day in the future.

20 Q. Do you have a plan to move in with him

21 presently?

22 A. No.

23 Q. Have you been to the apartment that you and

24 [REDACTED] have discussed moving in together?

25 A. I have been to the apartment.

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1 Q. Where is that?

2 A. Palm Beach Lakes.

3 Q. Have you spent the night over there?

4 A. No, sir.

5 Q. Do you know the address there?

6 A. I do not.

7 Q. Isn't your sister [REDACTED] planning on living

8 with you and [REDACTED]?

9 A. No.

10 Q. [REDACTED] you know that this court case is a

11 criminal prosecution, correct?

12 A. Correct.

13 Q. And you know that it's a criminal

14 prosecution against a man who has no criminal background.

15 Do you know that?

16 A. I do now.

17 Q. You agree that court is a very serious

18 matter?

19 A. Yes.

20 Q. And you're here with your lawyer

21 Mr. Leopold, right?

22 A. Yes.

23 Q. And you know that Mr. Leopold recently

24 filed a lawsuit in federal court against Jeffrey Epstein,

25 seeking fifty million dollars.

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1 MR. LEOPOLD: Let me just object.

2 [REDACTED] let me instruct you. Anything that

3 you have learned through conversations between you

4 and me are protected. So if you know any of that

5 information outside of those discussions, you may

6 answer. But if the only way you know it is

7 through our discussions, do not answer that

8 question.

9 BY MR. TEIN:

10 Q. [REDACTED] you know that Mr. Leopold recently

11 filed a lawsuit in federal court on your behalf against

12 Jeffrey Epstein seeking fifty million dollars?

13 MR. LEOPOLD: Same objection.

14 If you know the answer to that outside of

15 our discussions, you may answer. If it is the

16 only way that you know the answer is through our

17 discussions, do not answer that question.

18 THE WITNESS: Okay.

19 MR. LEOPOLD: Attorney/client privilege.

20 BY MR. TEIN:

21 Q. You can answer the question unless --

22 MR. LEOPOLD: Same objection.

23 MR. TEIN: Let me finish.

24 MR. LEOPOLD: Excuse me. We're --

25 MR. TEIN: No. Let me finish.

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1 MR. LEOPOLD: Lewis, we're not going to do  
2 that.

3 MR. TEIN: My name is not Lewis.

4 I'm going to finish my question. Okay?

5 MR. LEOPOLD: Do not answer until you hear  
6 from me.

7 BY MR. TEIN:

8 Q. Other than conversations that you have had  
9 with Mr. Leopold -- I'm not asking about that -- are you  
10 aware that Mr. Leopold has filed a lawsuit in federal  
11 court seeking fifty million dollars from Jeffrey Epstein  
12 on your behalf?

13 MR. LEOPOLD: Same objection.

14 Anything that you learn through  
15 conversations between you and me, do not answer.  
16 Those are protected. If you know through any  
17 other realm of knowledge, you may answer.

18 THE WITNESS: No.

19 BY MR. TEIN:

20 Q. You have no idea that Mr. Leopold filed a  
21 fifty million-dollar lawsuit on your behalf against  
22 Jeffrey Epstein?

23 MR. LEOPOLD: Same objection.

24 Do not answer that question if it's through  
25 discussions that you and I had. Outside of that,

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1 you may answer. So do not answer that question if  
2 that is the only basis by which you understand  
3 that answer.

4 THE WITNESS: No.

5 BY MR. TEIN:

6 Q. You didn't know that?

7 MR. LEOPOLD: Don't answer that question.  
8 Again, it's attorney/client privilege. Any  
9 information you've learned through conversations  
10 between you and I are protected. If you know it  
11 through any other realm, you may answer.

12 MR. TEIN: Are you going to say that for  
13 every question in the deposition, Mr. Leopold?

14 MR. LEOPOLD: When you ask improper  
15 questions like that without the proper --

16 MR. TEIN: You're going to stop your  
17 speaking objections right now. Okay?

18 MR. LEOPOLD: Without the proper --

19 MR. TEIN: You need to stop your speaking  
20 objections.

21 Let's continue.

22 MR. LEOPOLD: Counsel, you just asked me a  
23 question and I'm going to state it on the  
24 record --

25 MR. TEIN: You need to stop your speaking

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1 objections. Check your rules.

2 MR. LEOPOLD: Excuse me. For the record,  
3 Counsel asked me a question. I'll state the  
4 answer on the record. He asked me the question am  
5 I going to be answering that way throughout the  
6 deposition. So long as there's improper  
7 foundation and predicate asked by the attorney, I  
8 will protect my client and I make the record where  
9 appropriate. If counsel wishes to ask an  
10 appropriate worded question with the proper  
11 foundation and predicate, I will certainly allow  
12 the client to answer the question.

13 MR. GOLDBERGER: Why don't you just state  
14 attorney/client privilege and just be done with  
15 it?

16 MR. LEOPOLD: I want the record to be  
17 clear.

18 MR. TEIN: You want to waste time is what  
19 you want to do.

20 You were supposed to be here this morning  
21 and you totally broke the deal, the agreement that  
22 you had with us if your hearing got cancelled.

23 But let's move on and maybe you'll stop  
24 obstructing this deposition.

25 MR. LEOPOLD: I think the record is very

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1 clear where we stand thus far.

2 Is there a recording taken of this  
3 deposition?

4 THE COURT REPORTER: Yes.

5 MR. LEOPOLD: Just make sure that's  
6 preserved.

7 BY MR. TEIN:

8 Q. Go to Exhibit 20-01 -- well, before you do  
9 that, are you aware that a lawyer named Jeffrey  
10 Herman filed a lawsuit on your behalf, yes or no?

11 MR. LEOPOLD: Objection.

12 Any conversations that you and I have had  
13 regarding that, if that is the only way by which  
14 you understand how to answer that question, do not  
15 answer. It's attorney/client privilege, as well  
16 as any conversations you may have had with the  
17 attorney from Miami. That is also attorney/client  
18 privilege. And I'm assuming --

19 MR. TEIN: You're actually wrong about the  
20 attorney/client privilege.

21 MR. LEOPOLD: I'm assuming Counsel is not  
22 asking you to divulge attorney/client --

23 MR. TEIN: Of course not.

24 BY MR. TEIN:

25 Q. are you aware that Jeffrey Herman,

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1 an attorney, filed a fifty-million-dollar lawsuit on your  
2 behalf against Jeffrey Epstein, yes or no?

3 MR. LEOPOLD: Same objection.

4 MR. TEIN: We've heard the objection 10  
5 times already.

6 MR. LEOPOLD: Counsel, excuse me.

7 MR. TEIN: Just say attorney/client  
8 privilege. Stop interrupting my questions.

9 MR. LEOPOLD: I'm entitled to make an  
10 objection for the record, which I'm doing, and  
11 I'll make the same objection. And if it calls for  
12 attorney/client privilege, any conversations you  
13 and I have had, do not answer the question.

14 And I think that it might be appropriate,  
15 for the record, to ask questions via [REDACTED]  
16 [REDACTED] as opposed to [REDACTED] I think that  
17 would be more appropriate for this deposition.

18 BY MR. TEIN:

19 Q. Go ahead. Please answer yes or no.

20 A. Yes.

21 Q. Thank you.

22 In fact, you know that Mr. Herman held a  
23 press conference after he filed the fifty-million-dollar  
24 lawsuit on your behalf, don't you?

25 A. After it happened.

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1 Q. You know that he had a press conference,  
2 don't you, yes or no?

3 A. Yes.

4 Q. In fact, let's go to Exhibit 20-01.

5 MR. GOLDBERGER: Look behind you. You'll  
6 see it.

7 BY MR. TEIN:

8 Q. Have you ever seen that picture before?

9 A. Yes.

10 Q. Is that a picture of your father, your  
11 stepmother and Mr. Herman at the press conference  
12 regarding your lawsuit?

13 A. Yes.

14 Q. Now you know that this is a very serious  
15 matter, don't you?

16 MR. LEOPOLD: Asked and answered.

17 Objection.

18 MR. GOLDBERGER: All right. You can  
19 object. You're representing a witness here,  
20 Mr. Leopold. You can object on privilege grounds.  
21 You cannot make legal objections. You have no  
22 standing to do so.

23 MR. LEOPOLD: I'm going to make them and  
24 then --

25 MR. GOLDBERGER: We're --

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1 MR. LEOPOLD: We're going to leave or we're  
2 going to take a break, because his demeanor is not  
3 appropriate. There's no reason to have this kind  
4 of demeanor. If you want to have this kind of  
5 demeanor with me --

6 MR. TEIN: You are obstructing this  
7 deposition.

8 MR. GOLDBERGER: Why don't you guys go  
9 outside and just talk about --

10 MR. LEOPOLD: She -- her job is very  
11 difficult and she's not going to be able to take  
12 us both talking at the same time.

13 MR. GOLDBERGER: Off the record.

14 MR. LEOPOLD: We're not going off the  
15 record, Jack. We're not, Jack. Her job is very  
16 difficult. I'm going to make the record.

17 I don't think it is appropriate, especially  
18 in the small confines of this room, to be very  
19 aggressive with this young lady.

20 MR. TEIN: That's not happening. Stop,  
21 stop actually --

22 MR. LEOPOLD: If you're going to interrupt  
23 me, we're going to cancel this deposition --

24 MR. TEIN: Stop misrepresenting.

25 THE COURT REPORTER: I need one at a time,

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1 no matter who it is.

2 MR. LEOPOLD: I think we're going to take a  
3 break. Perhaps you might want to talk to your  
4 co-counsel --

5 MR. TEIN: I don't need to talk to him.

6 MR. LEOPOLD: But we're going to take a  
7 break.

8 MR. TEIN: We're not taking a break unless  
9 the witness needs a break.

10 You're obstructing this deposition, Ted.

11 MR. LEOPOLD: Come on, [REDACTED]  
12 You all want to continue in this  
13 demeanor --

14 MR. TEIN: You're obstructing the  
15 deposition. Stop making speeches. We're not  
16 discussing this with you. The questions are to  
17 your client. Go take your five-minute break.

18 MR. LEOPOLD: Fine. We need to make sure  
19 the record's clear and clean.

20 And I want to make sure, as I've already  
21 asked you -- I know that you're one of the best in  
22 town -- that this audio -- this needs to be  
23 preserved. Okay?

24 MR. TEIN: Go take your five-minute break,  
25 Mr. Leopold, now.

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1 You were supposed to be here at nine a.m.;  
2 it's now after two. Take your break and come  
3 back.  
4 MR. LEOPOLD: Okay. If the demeanor keeps  
5 up, we will not be here beyond those five minutes.  
6 MR. TEIN: Take your break and come back.  
7 MR. LEOPOLD: Okay. So I suggest that you  
8 relax.  
9 MR. TEIN: I suggest that you take your  
10 break.  
11 MR. GOLDBERGER: Let them take that  
12 five-minute break.  
13 MR. LEOPOLD: But I would suggest that you  
14 take deep breaths.  
15 MR. TEIN: Suggest whatever you want. Go  
16 take a break.  
17 (Thereupon, a recess was taken.)  
18 BY MR. TEIN:  
19 Q. [REDACTED] you agree that giving testimony  
20 today at your deposition is something very serious, don't  
21 you?  
22 A. Yes.  
23 Q. And you respect the court, don't you?  
24 A. Yes.  
25 Q. Let me show you Exhibit 31-001. Can you

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1 read that out loud, please.  
2 A. Okay. What do you want?  
3 Q. Will you read that out loud, please.  
4 A. Oh.  
5 Q. Thank you.  
6 A. Lol hah my badd...lol yah i got some  
7 stupid court shit on the 20th...bullshit...and damn you  
8 still have court shit with him? Like after so long wow  
9 im sorry... well yah well we will definitely havta make  
10 plans for sure..because i miss u tons times a million and  
11 no no no i love you...o and p.s. i love ur default pic  
12 niggaa. Muah xo.  
13 Q. Did you send that message last week to a  
14 friend of yours on MySpace?  
15 A. I wouldn't know. There's no dates and I've  
16 deleted that MySpace, so --  
17 Q. We're going to talk about that in a second.  
18 A. Okay.  
19 Q. Did you send that message last week --  
20 A. Right.  
21 Q. Let me finish my question.  
22 Did you send that message last week to a  
23 friend of yours on MySpace?  
24 A. I wouldn't know the date, but obviously,  
25 it's to a friend.

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1 Q. Did you send that message to a friend of  
2 yours on MySpace?  
3 A. Sure, yes.  
4 Q. Were you referring to this deposition?  
5 A. Yes.  
6 Q. Do you find the term n-i-g-g-e-r offensive?  
7 A. That's not anywhere in there.  
8 Q. What word did you use in there?  
9 MR. LEOPOLD: Where are you referring to,  
10 Counsel? There's 20 plus words in there.  
11 MR. TEIN: Don't make a speaking objection.  
12 THE WITNESS: Are you referring to  
13 anything --  
14 MR. LEOPOLD: No, [REDACTED] Don't -- don't --  
15 let him ask you the question.  
16 BY MR. TEIN:  
17 Q. What question were you asking, [REDACTED]?  
18 MR. LEOPOLD: She doesn't ask questions.  
19 You ask the questions. What is the question  
20 pending?  
21 BY MR. TEIN:  
22 Q. [REDACTED] what is the last word on there in  
23 the text of your message before the closing?  
24 A. Niggaa.  
25 Q. Don't you find that term offensive?

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1 A. No.  
2 MR. LEOPOLD: Can you spell it for the  
3 record, please.  
4 THE WITNESS: N-i-g-g --  
5 MR. TEIN: No, no, no. You are not going  
6 to be asking questions.  
7 MR. LEOPOLD: I'm not asking questions.  
8 I'm asking for the record the word to be spelled,  
9 because we don't have a video here today.  
10 MR. TEIN: These exhibits are part of the  
11 record. You --  
12 MR. LEOPOLD: Well, it's not marked as an  
13 exhibit.  
14 MR. TEIN: Stop interrupting me,  
15 Mr. Leopold. I have marked and identified as an  
16 exhibit and you will get it.  
17 MR. LEOPOLD: There has been no  
18 identification of this document in the record.  
19 MR. TEIN: Mr. Leopold, stop interrupting  
20 this deposition.  
21 MR. LEOPOLD: What is the exhibit number  
22 marked for identification?  
23 MR. TEIN: 31-001.  
24 MR. LEOPOLD: Do we have copies? Is it on  
25 the record anywhere?

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1 BY MR. TEIN:  
2 Q. Let me ask you, [REDACTED] did you in fact  
3 write your friend this message about this deposition?  
4 A. Yes.  
5 Q. So you wrote your friend that this  
6 deposition is stupid court s-h-i-t, correct?  
7 A. Yes.  
8 Q. Because you think this deposition is stupid  
9 court s-h-i-t, don't you?  
10 A. No.  
11 Q. You wrote that to your friend, didn't you?  
12 A. Yes.  
13 Q. You think that court is stupid, don't you?  
14 A. In some cases.  
15 Q. And you think that court is bull s-h-i-t,  
16 don't you?  
17 A. No.  
18 Q. And you think this deposition is bull  
19 s-h-i-t, don't you?  
20 A. No.  
21 Q. You wrote that to your friend, didn't you?  
22 MR. LEOPOLD: Objection. Asked and  
23 answered.  
24 MR. TEIN: That's not an objection.  
25 BY MR. TEIN:

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1 Q. You wrote that to your friend, didn't you?  
2 MR. LEOPOLD: Objection. Asked and  
3 answered, for the fourth time.  
4 MR. TEIN: You are improperly objecting,  
5 Mr. Leopold. You have no grounds to object. And  
6 that's not an objection.  
7 MR. LEOPOLD: It is an objection.  
8 MR. TEIN: Then terminate the deposition if  
9 you think it's been asked and answered.  
10 MR. LEOPOLD: Counsel, I am not precluded  
11 from just making an objection to the form of the  
12 question. As the courts well know, and if you  
13 practice here in West Palm Beach, many of the  
14 judges require you to set the objection with  
15 specificity. And I will do that. And if you  
16 don't want me to, you can make the record. But I  
17 will do that.  
18 MR. TEIN: Here's what we'll do, Ted. You  
19 can -- I will allow you to reserve an objection to  
20 form for every single one of my questions.  
21 Otherwise, all you're doing is obstructing.  
22 MR. LEOPOLD: I won't do that.  
23 MR. TEIN: Of course; because you want to  
24 obstruct.  
25 MR. LEOPOLD: All right.

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1 BY MR. TEIN:  
2 Q. [REDACTED] you think that giving testimony  
3 today, under oath, is bull s-h-i-t, don't you?  
4 A. No.  
5 Q. And you wrote that to your friend on  
6 MySpace last week, didn't you?  
7 MR. LEOPOLD: Objection. Asked and  
8 answered.  
9 THE WITNESS: No, I did not.  
10 BY MR. TEIN:  
11 Q. You didn't write this exhibit?  
12 A. I wrote that, but I didn't write what you  
13 said.  
14 Q. You wrote in this exhibit, "I got some  
15 stupid court s-h-i-t on the 20th. Bull s-h-i-t." Didn't  
16 you write that?  
17 A. Yes.  
18 Q. Referring to this deposition, didn't you?  
19 A. Referring to the court. I was later  
20 informed that it was a deposition.  
21 Q. I'm going to ask you some questions now  
22 about what happened when you went to Jeff Epstein's house  
23 three years ago. Okay?  
24 A. Uh-huh.  
25 Q. When the police interviewed you one month

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1 after you went to Epstein's house, you swore on your  
2 mother's grave that you and Epstein did not engage in sex  
3 of any kind?  
4 A. Yes.  
5 Q. Didn't you tell that to the police?  
6 A. Yes. And I will continue. I have never  
7 had sex with him.  
8 Q. Did what happened upstairs at Jeff  
9 Epstein's house take you completely by surprise, [REDACTED]?  
10 A. Yes.  
11 Q. Now the civil complaint that you filed  
12 against Mr. Epstein for fifty million dollars alleged  
13 that you were totally shocked by what happened when you  
14 got there.  
15 A. Yes.  
16 Q. Were you totally shocked by what happened  
17 when you got to Epstein's house?  
18 A. Yes.  
19 Q. You didn't expect it at all, did you?  
20 A. No.  
21 Q. You had absolutely no idea why your friend  
22 [REDACTED] was taking you to Epstein's house, right?  
23 A. I was informed it was a massage.  
24 Q. All you thought that it was going to be was  
25 a massage, correct?

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1 A. Yes.  
 2 Q. Before you got to Epstein's house [REDACTED]  
 3 never said anything to you on the telephone about sexual  
 4 activity with Epstein, did she?  
 5 A. No.  
 6 Q. And before you got to Epstein's house  
 7 [REDACTED] never sent you a message over the Internet about  
 8 sexual activity with Epstein, did she?  
 9 A. No.  
 10 Q. Did [REDACTED] ever try to convince you to  
 11 engage in any sexual activity with Epstein?  
 12 A. No.  
 13 Q. Did [REDACTED] every try to convince  
 14 you to engage in any sexual activity with Epstein?  
 15 A. I don't know who [REDACTED] is.  
 16 Q. Do you have a friend [REDACTED]?  
 17 A. No.  
 18 Q. Okay. Before you went to Epstein's house  
 19 did anyone call or e-mail you to induce you to engage in  
 20 sexual activity with Epstein?  
 21 A. No.  
 22 Q. So you're sure that before you got to  
 23 Epstein's house no one tried to persuade you to engage in  
 24 sexual activity with Jeffrey Epstein?  
 25 A. No.

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1 Q. You're sure that -- let me ask the question  
 2 again.  
 3 You're sure that before you got to  
 4 Epstein's house no one tried to persuade you to engage in  
 5 sexual activity with Epstein for money. Are you?  
 6 MR. LEOPOLD: Objection. Asked and  
 7 answered.  
 8 THE WITNESS: No. And I've already  
 9 answered that a bazillion times.  
 10 BY MR. TEIN:  
 11 Q. He's coaching you now. So I'm going to ask  
 12 the question --  
 13 MR. LEOPOLD: Counsel, I've made an  
 14 objection for the record.  
 15 MR. TEIN: Stop speaking.  
 16 MR. LEOPOLD: I'm not going to stop  
 17 speaking. You can't interrupt me when I'm making  
 18 the record.  
 19 MR. TEIN: You're coaching the witness.  
 20 MR. LEOPOLD: Counsel --  
 21 MR. TEIN: Stop coaching the witness.  
 22 BY MR. TEIN:  
 23 Q. [REDACTED] let me ask you --  
 24 MR. LEOPOLD: If you continue to --  
 25 MR. TEIN: Stop interrupting my questions.

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1 MR. LEOPOLD: If you do it one more time,  
 2 we're leaving.  
 3 BY MR. TEIN:  
 4 Q. [REDACTED]  
 5 MR. LEOPOLD: I'm going to make the record.  
 6 You cannot interrupt me when I'm making the  
 7 record. Out of professional conduct, you cannot  
 8 do that. I'm entitled to make the record. I made  
 9 an objection, asked and answered. Your demeanor  
 10 is inappropriate. You're willing and you are able  
 11 and you're responsible to ask a question in a  
 12 professional manner, and ask the question and once  
 13 you get the answer, to either follow up on it or  
 14 move on, but not continuously browbeat and ask the  
 15 same question over and over because you don't like  
 16 the answer.  
 17 MR. TEIN: Calm down, sir.  
 18 MR. LEOPOLD: Trust me, I'm very calm here.  
 19 When I'm not calm, you'll know it. I'm very calm.  
 20 So please continue on. But I will not  
 21 allow you to continue to harass her in the  
 22 demeanor that you're doing. Ask her a question  
 23 and move on.  
 24 MR. TEIN: Are you done?  
 25 MR. LEOPOLD: Thank you. I am.

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1 MR. TEIN: Stop misrepresenting the record  
 2 and calm down. I'm going to ask my question.  
 3 Stop it.  
 4 BY MR. TEIN:  
 5 Q. [REDACTED]  
 6 MR. LEOPOLD: I think the record is very  
 7 clear.  
 8 MR. GOLDBERGER: Let me just clarify  
 9 something. When you object to the form of a  
 10 question, you're not instructing the witness not  
 11 to answer the question, are you?  
 12 MR. LEOPOLD: No. And I'm not making that  
 13 objection; only on attorney/client privilege.  
 14 MR. TEIN: Will you stop speaking now so I  
 15 can ask my question? Are you done?  
 16 Okay. I'm going to ask my question.  
 17 BY MR. TEIN:  
 18 Q. Listen, [REDACTED] --  
 19 MR. LEOPOLD: Hold on. Stop.  
 20 I've been doing this for 20 plus years and  
 21 have met a lot of attorneys, but I've never had an  
 22 experience like this where I've --  
 23 MR. TEIN: Stop your speeches.  
 24 MR. LEOPOLD: If you continue to do this,  
 25 whether it's with me or with my client, I will not

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1 put up with it and I don't need to put up with it  
2 and it's not appropriate. And I'm sure  
3 Mr. Goldberger knows all this, because I know that  
4 he wouldn't do this. So I will not put up with  
5 it. And I think it's highly inappropriate to do  
6 this with this child sitting here, the way you're  
7 acting, primarily towards me, and I will not put  
8 up with it.

9 MR. TEIN: Will you please stop your speech  
10 so I can ask questions?

11 MR. LEOPOLD: So long as you act  
12 professionally, I will do so. But if you continue  
13 to do it this way, I will leave.

14 MR. TEIN: Suit yourself.

15 BY MR. TEIN:

16 Q. [REDACTED] are you sure that before you got to  
17 Epstein's house no one tried to persuade you to engage in  
18 sexual activity with Epstein for money?

19 MR. LEOPOLD: Asked and answered.  
20 Objection.

21 MR. TEIN: Did you get her answer?

22 THE COURT REPORTER: No, I did not.

23 THE WITNESS: I'm sure.

24 BY MR. TEIN:

25 Q. Let me ask you a few questions about your

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1 contact with Jeffrey Epstein. Okay?

2 A. (Witness nods head up and down.)

3 Q. Jeff never e-mailed you, did he?

4 A. No.

5 Q. Jeff never text messaged you, did he?

6 A. No.

7 Q. Jeff never chatted in a chat room with you,  
8 did he?

9 A. No.

10 Q. Before you got to Epstein's house you had  
11 never spoken to Jeff, had you?

12 A. No.

13 Q. And before you got to Epstein's house you  
14 had never met Jeff?

15 A. Correct.

16 Q. Before you got to Epstein's house you had  
17 never told Jeff that you were under 18, right?

18 A. No.

19 Q. Before you got to Epstein's house had you  
20 ever told Jeffrey that you were under 18?

21 A. No. I never spoke to the man before that.

22 Q. And you only went to Jeff Epstein's house  
23 that one time three years ago, correct?

24 A. Yes.

25 Q. You never went there again, correct?

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1 A. No.

2 Q. All right. Let me ask you two final areas  
3 of questioning about this and we'll move onto something  
4 else. Okay?

5 A. Uh-huh. Yes. I'm sorry.

6 Q. Before you got to Epstein's did anyone  
7 associated with Epstein ever call you on the phone and  
8 try to persuade, induce, entice or coerce you to engage  
9 in any sexual activity?

10 A. No.

11 Q. Before you got to Epstein's did anybody  
12 associated with Epstein ever contact you on the Internet  
13 and try to persuade, induce, entice or coerce you to  
14 engage in any sexual activity?

15 A. No.

16 Q. [REDACTED] who told you that when you got to  
17 Jeff Epstein's house you should lie to Jeff about your  
18 age?

19 A. [REDACTED]

20 Q. Was it [REDACTED] or was it the other girl in  
21 the car who you rode over with to Epstein's house?

22 A. [REDACTED]

23 Q. Who was the other girl in the car with you  
24 that day?

25 A. I honestly don't know.

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1 Q. Had you ever seen her before?

2 A. No, sir.

3 Q. You told the police that when you rode over  
4 to Epstein's you had no idea who she was, right?

5 A. Correct.

6 Q. You told the police that you didn't know  
7 her name, but she was like really dark, kind of like a  
8 Spanish girl?

9 A. Yes.

10 Q. Those were your words, right?

11 A. Yes.

12 Q. Do you now know who she is?

13 A. No, sir.

14 Q. So it was [REDACTED] who told you to lie about  
15 your age to Jeff Epstein?

16 A. Yes, sir.

17 Q. And [REDACTED] told you that if you weren't 18,  
18 Epstein wouldn't let you into his house, right?

19 A. That's -- yes, yes.

20 Q. All right. Let's talk for a minute about  
21 when you first met Jeff. Okay?

22 A. Sure.

23 Q. When you first met Jeff he tried to find  
24 out how old you were, right?

25 A. Excuse me?

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1 Q. When you first met Jeff he tried to find  
2 out how old you were, right?  
3 A. Not when we first introduced each other;  
4 when we get upstairs, then, yes.  
5 Q. During the massage Jeff asked you how old  
6 you were, correct?  
7 A. Yes, yes.  
8 Q. Now hadn't you already told Jeff's  
9 assistant, the one who walked you upstairs, that you went  
10 to college and had just moved down here from Ohio?  
11 A. I never spoke to the lady.  
12 Q. Do you want to rethink that answer?  
13 MR. LEOPOLD: Is that a question?  
14 BY MR. TEIN:  
15 Q. Do you want to rethink that answer?  
16 A. No. I didn't really speak with her that  
17 much.  
18 Q. Do you want to try to refresh your memory  
19 on that?  
20 MR. LEOPOLD: Do you have something to  
21 refresh her memory with?  
22 MR. TEIN: Do you want to stop making  
23 speaking objections?  
24 MR. LEOPOLD: No. But to refresh someone's  
25 memory, you show them a document.

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1 MR. TEIN: I know how to do this.  
2 MR. LEOPOLD: Then show her a document.  
3 MR. TEIN: Stop speaking.  
4 MR. LEOPOLD: I'm not going to stop  
5 speaking. I'm going to continue to make the  
6 record.  
7 MR. TEIN: You're obstructing. Please  
8 stop.  
9 MR. LEOPOLD: I'm not obstructing. But if  
10 you want to refresh her recollection, you need to  
11 show her something.  
12 That's not a proper question. I object to  
13 the foundation and the predicate of that question.  
14 MR. TEIN: Are you done?  
15 MR. LEOPOLD: I am now. Thank you.  
16 BY MR. TEIN:  
17 Q. Do you want to try to refresh your memory  
18 as to whether you had any conversation with the woman who  
19 walked you upstairs in Epstein's house in which you told  
20 her that you went to college and had just moved down from  
21 Ohio?  
22 MR. LEOPOLD: Objection. Object to the  
23 form of the question. Lack of foundation and  
24 predicate.  
25 BY MR. TEIN:

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1 Q. You can answer the question.  
2 A. Sure.  
3 Q. Is there anything that would refresh your  
4 memory that in fact you told Mr. Epstein's assistant, the  
5 one who walked you upstairs, that you went to college and  
6 you had just moved down here from Ohio?  
7 A. I don't remember saying that, but if you --  
8 I don't remember saying that myself, so --  
9 Q. That would be a lie, right?  
10 A. No. I really don't remember.  
11 Q. So you told Jeff that you were 18 years  
12 old, correct?  
13 A. Yes.  
14 Q. Do you remember Detective Michelle Pagan of  
15 the Police Department, Palm Beach Police Department?  
16 A. Yes.  
17 Q. Do you remember you spoke to her?  
18 A. Yes.  
19 Q. Do you remember that you told Detective  
20 Pagan that when you lied about your age to Jeff you said  
21 it really fast because you didn't want to make it sound  
22 like you were lying?  
23 A. I don't remember the words exactly, but I  
24 do remember telling her I told him I was 18.  
25 Q. And do you remember telling Detective Pagan

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1 that when you lied to Epstein about your age that you  
2 said it really fast so Epstein wouldn't realize you were  
3 lying?  
4 A. No, I don't remember saying those words  
5 exactly to her. I remember telling her that I told  
6 Epstein I was 18.  
7 Q. Does it sound right to you that you told  
8 Detective Pagan that you said your age really fast to  
9 Epstein --  
10 MS. BELOHLAVEX: Objection. Asked and  
11 answered.  
12 BY MR. TEIN:  
13 Q. -- so he wouldn't think that you were  
14 lying?  
15 MR. LEOPOLD: Objection. Asked and  
16 answered, lack of foundation, mischaracterization  
17 of her earlier testimony. She's already answered  
18 that question.  
19 BY MR. TEIN:  
20 Q. You can answer it.  
21 MR. LEOPOLD: Same objection. It's been  
22 asked and answered.  
23 You can answer. I've made the objection.  
24 THE WITNESS: I forget the question, now.  
25

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1 BY MR. TEIN:  
2 Q. Let me put it again.  
3 Does it sound right to you that you told  
4 Detective Pagan that when you lied about your age to  
5 Jeffrey Epstein, you said it really fast because you  
6 didn't want to make it sound like you were lying?  
7 MR. LEOPOLD: Objection. Lack of  
8 foundation, asked and answered.  
9 THE WITNESS: I could have possibly said  
10 that, yes.  
11 BY MR. TEIN:  
12 Q. You didn't want Mr. Epstein to know that  
13 you were lying about your age, right?  
14 A. Correct.  
15 Q. You didn't want Mr. Epstein to know that  
16 you were not 18 yet, right?  
17 A. Correct.  
18 Q. You wanted Mr. Epstein to believe that you  
19 really were 18, right?  
20 A. Correct.  
21 Q. Do you remember when Mr. Epstein asked  
22 where you went to school?  
23 A. Yes.  
24 Q. And you told Mr. Epstein you went to  
25 Wellington, right?

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1 A. Yes.  
2 Q. Was that the truth?  
3 A. No.  
4 Q. In fact, you went to Royal Palm, right?  
5 A. Yes.  
6 Q. So you lied to Mr. Epstein again, correct?  
7 A. Yes.  
8 Q. Is Wellington the college that you told  
9 Jeff's assistant that you were attending?  
10 A. I don't remember having that conversation  
11 with her, so I wouldn't know if that's what I said.  
12 Q. That was a lie, though, wasn't it?  
13 MR. LEOPOLD: Objection to the form of the  
14 question, lack of foundation. You're making an  
15 assumption. She just answered you she can't tell  
16 you that.  
17 MR. TEIN: Speaking objection. And you  
18 well know that, Mr. Leopold.  
19 MR. LEOPOLD: She can't answer that  
20 question. The way you phrased that question,  
21 you're purposely making her not be honest in her  
22 testimony. She can't answer a question like that.  
23 She doesn't remember. So then you say, "So you  
24 were lying." That's improper and you know that.  
25 That's not a proper question. And any attorney

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1 that would do that to a witnesses or to a person  
2 that's sitting in this chair is not acting  
3 professionally. You can't ask a question like  
4 that. You can do it, but it's not proper. And  
5 I'm sure you weren't trained that way, certainly  
6 not ethically.  
7 MR. TEIN: Will you stop?  
8 MR. LEOPOLD: I'm not going to stop,  
9 because the way you're asking that question is  
10 improper and you know it.  
11 MR. TEIN: You're losing your cool.  
12 BY MR. TEIN:  
13 Q. Ms. [REDACTED] --  
14 MR. LEOPOLD: Trust me. I'm very calm.  
15 When I lose my cool, you'll know it.  
16 MR. TEIN: I do know it.  
17 BY MR. TEIN:  
18 Q. Ms. [REDACTED] Mr. Epstein never asked you  
19 to do anything other than massage him, correct?  
20 A. Incorrect; because he asked me to take off  
21 my bra, so that would be two things he's asked me to do.  
22 Q. Other than asking you to take your bra off,  
23 Mr. Epstein never asked you to do anything with him other  
24 than massage, correct?  
25 MR. LEOPOLD: Objection. Foundation,

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1 predicate.  
2 THE WITNESS: Correct.  
3 BY MR. TEIN:  
4 Q. You told the police, in your words, that  
5 you did not whack him off, right?  
6 A. Correct.  
7 Q. What does that mean?  
8 A. Whack, like whacking off?  
9 Q. Your term, what does that mean?  
10 A. Masturbating.  
11 Q. Mr. Epstein never tried at any time to grab  
12 your hand, did he?  
13 A. No.  
14 Q. Mr. Epstein never tried to put your hand  
15 anywhere, did he?  
16 A. No.  
17 Q. At no time did you touch Mr. Epstein's  
18 penis, did you?  
19 A. No.  
20 Q. And he did not touch you, correct?  
21 A. Incorrect.  
22 Q. Well, you told the police, "At no time did  
23 he touch me." Were you lying to the police then?  
24 A. No. Well, I wasn't being fully truthful,  
25 but I wasn't lying.

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1 Q. You told the police twice when you spoke to  
2 Michelle Pagan that "at no time did he touch me." Didn't  
3 you say that to the police?  
4 A. Yeah.  
5 Q. And you're saying that that was not fully  
6 truthful. Is that what you're saying now?  
7 A. Correct.  
8 Q. And you're saying if you're not fully  
9 truthful, that's not a lie. Correct?  
10 A. You took that out of context like really  
11 bad. I didn't mean like that. Touching my legs and --  
12 he never kept his hands to himself the entire time.  
13 That's what I'm trying to say.  
14 Q. You told the police, "At no times did he  
15 touch me." You agree with that, correct?  
16 A. No, I don't agree with that, because he did  
17 touch me.  
18 Q. Did you tell the police that he did not  
19 touch you, yes or no?  
20 A. It's a possibility, but I do not remember.  
21 Q. Okay. And you did not have any type of sex  
22 with Jeff, correct?  
23 A. No.  
24 Q. And you did not have any type of oral sex  
25 with Jeff, correct?

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1 A. No.  
2 Q. No type of intercourse with Jeff, correct?  
3 A. Correct.  
4 Q. All right. Let's talk about what happened  
5 after the massage was over.  
6 A. Okay.  
7 Q. After the massage, you told Epstein that  
8 you wanted to bring your twin sister back so she could  
9 make some money, correct?  
10 A. Incorrect.  
11 Q. Your twin sister is [REDACTED] right?  
12 A. Correct.  
13 Q. And you love [REDACTED] very much, don't you?  
14 A. Yes.  
15 Q. And when you left the house you were joking  
16 with the other girls, weren't you?  
17 A. Incorrect.  
18 Q. Well, when [REDACTED] and the other girl in the  
19 car that day made their statements to the police they  
20 told the police that you were joking afterwards. Are you  
21 saying that they were lying to the police about that?  
22 A. No. But a question or -- questions from  
23 [REDACTED] -- like she asked me questions, but it wasn't  
24 joking. She was kind of like in a happy way, like, "Oh,  
25 what did you do? What did you do?" Like those kind of

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1 things, but it wasn't joking about it at all.  
2 Q. You joked about it, didn't you?  
3 A. No.  
4 Q. You said to [REDACTED] that if you did this  
5 every weekend you'd be rich, didn't you?  
6 A. No. That's what [REDACTED] told me.  
7 Q. You didn't tell that to [REDACTED]  
8 MR. LEOPOLD: Objection. Asked and  
9 answered.  
10 THE WITNESS: No.  
11 BY MR. TEIN:  
12 Q. After you left Epstein's house you took the  
13 money and you went shopping with [REDACTED] and the other  
14 girl in the car, correct?  
15 A. Incorrect. I didn't spend any of the  
16 money.  
17 Q. You went to Marshall's, didn't you?  
18 A. I went along, yes, but I didn't --  
19 Q. You went shopping with them at Marshall's,  
20 didn't you?  
21 MR. LEOPOLD: Objection.  
22 THE WITNESS: I guess you could say that.  
23 MR. LEOPOLD: Objection. Lack of predicate  
24 and foundation. Mischaracterization of earlier  
25 testimony.

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1 BY MR. TEIN:  
2 Q. And [REDACTED] bought a purse, right?  
3 A. Yes.  
4 Q. And you were with her the whole time at  
5 Marshall's, correct?  
6 A. Yes.  
7 Q. Now tell me about when the federal  
8 prosecutors told you about getting reimbursed.  
9 A. I have no idea what you're talking about.  
10 Q. Tell me about when the federal prosecutors  
11 spoke to you about getting money you feel you're entitled  
12 to from Mr. Epstein.  
13 A. I don't know what you're talking about.  
14 Q. Do you know who Marie Villafona is?  
15 A. No, sir.  
16 Q. Did you ever meet with any federal  
17 prosecutors?  
18 A. I think -- yeah. I think they were -- I  
19 think they were like FBI.  
20 Q. Uh-huh. Did you meet with federal  
21 prosecutors?  
22 A. They came to my house one time, yes.  
23 Q. When did they come to your house?  
24 A. Very long ago.  
25 Q. Was it this year, 2008?

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1 A. It was not this year, no.  
 2 Q. Was it 2007?  
 3 A. I'd have to say at least two years ago or a  
 4 year ago, yeah. So it would be 2007, 2006; but it was a  
 5 while ago.  
 6 Q. How many federal prosecutors or FBI agents  
 7 came to your house?  
 8 A. I'm trying to remember. I want to say four  
 9 people came.  
 10 Q. Did they give you their business cards?  
 11 A. If they did, I don't remember, and they  
 12 weren't toward me. Maybe my parents have them. I don't  
 13 know.  
 14 Q. Did they give you their cell phone numbers?  
 15 A. No.  
 16 Q. Did you ever speak to them on their cell  
 17 phones?  
 18 A. No, sir.  
 19 Q. Did they speak to your parents?  
 20 A. That's something you'd have to ask my  
 21 parents.  
 22 Q. Do you know whether they spoke to your  
 23 parent's?  
 24 A. No, sir.  
 25 Q. You have no idea?

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1 A. No, sir.  
 2 MR. LEOPOLD: Objection. Asked and  
 3 answered.  
 4 BY MR. TEIN:  
 5 Q. So if I say the name to you Marie  
 6 Villafona, you don't know who that is?  
 7 A. No, sir.  
 8 Q. How many women and how many men came to  
 9 your house?  
 10 A. I want to say two ladies and two guys.  
 11 Q. Did someone named Jeffrey Sloman come to  
 12 your house?  
 13 A. I don't know names, sir.  
 14 Q. Do you know who Jeffrey Sloman is?  
 15 A. No, sir.  
 16 Q. Do you know who Jeffrey Herman is?  
 17 A. Yes.  
 18 Q. That's the lawyer who first sued Epstein on  
 19 your behalf, right?  
 20 A. Yes.  
 21 Q. Has Mr. Herman advanced your family any  
 22 money?  
 23 MR. LEOPOLD: Any conversations that you've  
 24 had with Mr. Herman regarding that issue, you are  
 25 not to disclose. If you've learned in some other

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1 fashion, you may answer.  
 2 THE WITNESS: Okay.  
 3 I wouldn't know.  
 4 BY MR. TEIN:  
 5 Q. You don't know?  
 6 A. No.  
 7 MR. LEOPOLD: Objection. Foundation.  
 8 Attorney/client privilege.  
 9 BY MR. TEIN:  
 10 Q. And you say you don't know who Jeff Sloman  
 11 is?  
 12 A. No, sir.  
 13 Q. Does it refresh your recollection that he's  
 14 the number two prosecutor at the U.S. Attorney's Office?  
 15 A. No.  
 16 Q. That he's Marie Villafona's boss?  
 17 A. No.  
 18 Q. Does it refresh your memory that he's the  
 19 ex-partner of Jeff Herman, the first lawyer who sued  
 20 you -- sued Mr. Epstein on your behalf for fifty million  
 21 dollars?  
 22 A. No, sir. I don't know who he is.  
 23 Q. Without telling me any conversations that  
 24 you've had with your lawyers, how is it that you selected  
 25 Mr. Herman as your lawyer from the 81,000 members of the

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1 Florida Bar?  
 2 A. I did not select him.  
 3 Q. Who did?  
 4 A. My father.  
 5 Q. Did you ever meet Mr. Herman?  
 6 A. Once.  
 7 Q. Don't -- don't tell me what you discussed  
 8 with him. Where did you meet him?  
 9 A. I was shopping in my -- he showed up at my  
 10 friend's house.  
 11 Q. Whose house?  
 12 A. My friend [REDACTED]  
 13 Q. Is that [REDACTED] from the Quarterdeck  
 14 Tavern?  
 15 A. Yes.  
 16 Q. And did you have a meeting with him at  
 17 [REDACTED] house?  
 18 A. Yes. I guess you could say that.  
 19 Q. And who else was there?  
 20 A. My Aunt [REDACTED]  
 21 Q. And what was that meeting about?  
 22 MR. LEOPOLD: Objection. That calls for  
 23 attorney/client privilege.  
 24 BY MR. TEIN:  
 25 Q. What discussions did you have with

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1 Mr. Herman in the presence of [REDACTED]?  
 2 A. None.  
 3 Q. What discussions did you have in the  
 4 presence of her aunt?  
 5 A. Of my aunt?  
 6 MR. GOLDBERGER: It's the witness's aunt.  
 7 BY MR. TEIN:  
 8 Q. Oh, of your aunt.  
 9 A. The only one that we've ever discussed or  
 10 ever had.  
 11 Q. And so you were in a conversation with  
 12 Mr. Herman and your aunt?  
 13 A. Yes, sir.  
 14 Q. And you discussed privileged matters during  
 15 that conversation?  
 16 MR. LEOPOLD: Object to the form. I think  
 17 you might have to educate her on that question.  
 18 BY MR. TEIN:  
 19 Q. You discussed the lawsuit?  
 20 A. Yes.  
 21 Q. Did [REDACTED] tell you about any  
 22 conversations that she had with Mr. Herman?  
 23 A. As far as I'm concerned, she's never spoken  
 24 or she's never had a conversation. She only opened the  
 25 door and then left. She's the one who answered the door.

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1 Q. Why did the meeting take place at [REDACTED]  
 2 [REDACTED] house?  
 3 A. I spent the night that night at her house.  
 4 Q. And when was this?  
 5 A. A while ago.  
 6 Q. How long ago?  
 7 A. A month and a half ago. I'm guessing.  
 8 Q. A month and a half ago?  
 9 A. Uh-huh.  
 10 Q. So was it before or after Mr. Herman filed  
 11 the fifty-million-dollar lawsuit against Epstein?  
 12 A. After.  
 13 Q. Did you meet with an FBI agent named  
 14 Nesbitt Kurkendall, a woman?  
 15 A. I don't know.  
 16 Q. Did Ms. Kurkendall speak to you about  
 17 getting reimbursed from Mr. Epstein?  
 18 A. I've never had a discussion with anyone  
 19 about getting reimbursed from Mr. Epstein.  
 20 Q. Have you met with an agent named Jason  
 21 Richards?  
 22 A. Not to my knowledge.  
 23 Q. How about an agent named Tim Slater?  
 24 A. No, sir.  
 25 Q. How about an agent named Junior Ortiz?

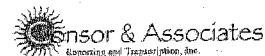
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1 A. No.  
 2 Q. And we've learned that many of the girls,  
 3 some of whom are as old as 23, were told by the  
 4 government that they would get money at the end of the  
 5 criminal prosecution. Does that sound familiar to you?  
 6 A. No, sir.  
 7 Q. Other than Mr. Leopold here -- I'm not  
 8 asking about Mr. Herman either --  
 9 A. Uh-huh.  
 10 Q. -- did anyone ever discuss with you that  
 11 you could get reimbursement for your damages?  
 12 A. No, sir.  
 13 Q. Did you or any member --  
 14 MR. LEOPOLD: Are you referring to a  
 15 criminal matter or a civil matter?  
 16 BY MR. TEIN:  
 17 Q. Did you or any member --  
 18 MR. LEOPOLD: Excuse me. Let me object to  
 19 the form of the question.  
 20 BY MR. TEIN:  
 21 Q. Did you or any member of your family ever  
 22 get a victim notification letter from anyone?  
 23 A. I no longer live at that residence and I  
 24 wouldn't know.  
 25 Q. So your testimony is that you have never

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1 [REDACTED] received a victim notification letter, correct?  
 2 rect.  
 3 Q. And your testimony is that you don't know  
 4 if your parents have ever received a victim notification  
 5 letter, correct?  
 6 A. Correct.  
 7 Q. Have you given any evidence to prosecutors  
 8 or law enforcement in this case?  
 9 A. What do you mean by evidence?  
 10 Q. Well. Anything that you can touch or feel.  
 11 A. No.  
 12 MR. LEOPOLD: Objection to the form of the  
 13 question.  
 14 BY MR. TEIN:  
 15 Q. So you haven't given anything physical --  
 16 A. No.  
 17 Q. -- any item to any prosecutor, police  
 18 officer or law enforcement agent, correct?  
 19 A. My cell phone four years ago or three years  
 20 ago, but that's it.  
 21 Q. You gave your cell phone to whom?  
 22 A. Michelle Pagan.  
 23 Q. Did she keep it?  
 24 A. Ask her.  
 25 Q. You gave it to her and then you didn't get

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1 it back at the end of the meeting?

2 A. No. They -- yeah. No. They have it. I'm

3 guessing. I don't have it.

4 Q. How much money are you hoping to get out of

5 Mr. Epstein?

6 MR. LEOPOLD: Objection to the form of the

7 question. Attorney/client privilege.

8 BY MR. TEIN:

9 Q. How much money are you hoping to get, you,

10 yourself, hoping to get out of Epstein?

11 MR. LEOPOLD: Same. Same objection,

12 attorney/client privilege.

13 Don't answer the question.

14 BY MR. TEIN:

15 Q. I'm not asking about what your lawyer told

16 you.

17 MR. LEOPOLD: I'm instructing her not to

18 answer the question, because any of those

19 conversations involve her counsel.

20 MR. TEIN: Certify that.

21 MR. LEOPOLD: Please.

22 .....CERTIFIED QUESTION.....

23 BY MR. TEIN:

24 Q. Now, [REDACTED] you lied to get out of this

25 deposition, didn't you?

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1 A. No, sir.

2 Q. You didn't want to come to court today and

3 tell the story that you had told to the police under

4 oath, did you?

5 MR. LEOPOLD: Object to the form of the

6 question. Lack of foundation, predicate.

7 THE WITNESS: No. I have no problem coming

8 here and talking to you.

9 BY MR. TEIN:

10 Q. And to avoid getting served with a lawful

11 subpoena, you lied about your name, didn't you?

12 A. No.

13 Q. And in fact, just lying yourself wasn't

14 enough, was it?

15 MR. LEOPOLD: Objection to the form of the

16 question.

17 Don't answer it. It's not a question.

18 Object to the form of the question. Lack

19 of foundation.

20 MR. TEIN: Are you instructing her not to

21 answer?

22 MR. LEOPOLD: I am.

23 MR. TEIN: Certify it.

24 MR. LEOPOLD: Please.

25

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1 .....CERTIFIED QUESTION.....

2 BY MR. TEIN:

3 Q. You asked your co-workers --

4 MR. LEOPOLD: It's vague and ambiguous.

5 BY MR. TEIN:

6 Q. You asked your co-workers at the

7 Quarterdeck Tavern to lie for you, didn't you?

8 A. No. I informed my boss about what was

9 going on and he told me that he would help in any way

10 that he can.

11 Q. Okay. You got your friend [REDACTED] to lie

12 by switching name tags with you, correct?

13 A. Incorrect. It was a coincidence that same

14 night she was not wearing her name tag; she was wearing

15 mine. But I was also not wearing -- I was wearing my

16 name tag. Everyone switches name tags. It just so

17 happens it was a coincidence that same night the people

18 came with the papers.

19 MR. TEIN: Will you put up Exhibit 18-001?

20 MR. GOLDBERGER: And mark 18-001 for

21 identification purposes to this deposition.

22 MR. LEOPOLD: None of them have been marked

23 yet. Can we mark them and put them as attachment

24 to the depositions? Because I think you've shown

25 three photos now. And this is the only one that

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1 has been marked for identification yet.

2 BY MR. TEIN:

3 Q. [REDACTED] --

4 MR. LEOPOLD: Hold on just a second. Just

5 so the record is clear --

6 MR. TEIN: I'm not speaking to you.

7 MR. LEOPOLD: Okay. Then don't speak to me

8 then. But I'll speak to Mr. Goldberger, perhaps.

9 But at least for the record, can we put on

10 the record what the previous two photographs were

11 marked for identification?

12 MR. GOLDBERGER: We will make sure that the

13 record is clear at the end of the deposition so

14 that there's no ambiguity.

15 MR. LEOPOLD: Thank you.

16 BY MR. TEIN:

17 Q. [REDACTED] I've put a photograph marked 18-001

18 up on the screen. Do you see that?

19 A. Yup.

20 Q. Who is that in the photo?

21 A. [REDACTED] on the left and me on the right.

22 Q. [REDACTED] right?

23 A. Yes.

24 Q. [REDACTED] your friend at the

25 Quarterdeck Tavern, right?

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1 A. Yes.

2 Q. [REDACTED] your friend, who you say the day

3 that the process servers went to serve you with a

4 subpoena for this deposition, just happened -- just by

5 coincidence, was wearing your name tag?

6 A. Yes, sir.

7 Q. And just by coincidence, you were wearing

8 her name tag, correct?

9 A. Yes.

10 Q. Your testimony under oath is that's just a

11 coincidence, right?

12 A. Total honesty.

13 Q. It just happens to be the day that you were

14 going to be served with a subpoena, correct?

15 A. That wasn't the first day that --

16 MR. LEOPOLD: [REDACTED] just answer the

17 question. It calls for a yes or no.

18 THE WITNESS: Yes.

19 BY MR. TEIN:

20 Q. You said that wasn't the first day you were

21 going to be -- you thought you were being served with a

22 subpoena, correct?

23 A. Correct.

24 Q. You knew before the day that you switched

25 name tags with [REDACTED] that the process servers were

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1 looking for you, didn't you?

2 A. No. I knew --

3 MR. LEOPOLD: Just answer it. It calls for

4 a yes or no.

5 THE WITNESS: Okay. No.

6 BY MR. TEIN:

7 Q. Now you can explain the answer that your

8 counsel stopped you from explaining.

9 A. Okay. I work at Quarterdeck and people

10 were telling me that people were looking for me. So yes,

11 I was aware that people were searching for me. But I had

12 no idea who they were or what their intentions were. But

13 I thought they were just people I didn't want to talk to.

14 So I just didn't want to talk to them. And every time

15 they'd come to work I wasn't there. And so happens the

16 night that they came in me and my friend switched name

17 tags. No big deal.

18 Q. That's a lie, isn't it?

19 MR. LEOPOLD: Objection. Don't answer that

20 question. That's harassment and I will not allow

21 it. He could ask the questions and we'll allow a

22 jury to make that determination, but not counsel.

23 I will not allow her to answer that

24 question.

25 MR. TEIN: Certify it.

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1 MR. LEOPOLD: I'll certify it.

2 .....CERTIFIED QUESTION.....

3 She's answered that question. She's explained it five

4 times already. The fact that Counsel doesn't like the

5 answer, that's a different query.

6 MR. TEIN: Stop making speaking objections.

7 MR. LEOPOLD: I'm not. I'm not going to

8 put up with it, because it's in appropriate, Jack,

9 and you know it. I will not allow Counsel to

10 berate a witness, whether it's in a criminal case

11 or a civil case, whether my client or --

12 MR. TEIN: Calm down.

13 MR. LEOPOLD: Excuse me.

14 No, I'm not going to allow it. That is not

15 proper.

16 MR. GOLDBERGER: Okay.

17 MR. LEOPOLD: If he wants to say that she's

18 lying after asking it five times and her

19 explaining in great detail, he can do that. But

20 I'm not going to allow her to answer, nor be

21 harassed by him. It's improper.

22 MR. GOLDBERGER: Okay. But your response

23 that Counsel doesn't like the question -- or

24 doesn't like the answer -- just let me finish.

25 MR. LEOPOLD: Absolutely. I wasn't going

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1 to interrupt you.

2 MR. GOLDBERGER: Just requires us to say we

3 like the answer to that question. And it's not

4 you and I or you and Mr. Tein who are testifying

5 here. It's the witness.

6 MR. LEOPOLD: Fine. But after the sixth

7 time of asking the same question and then coming

8 back and pointing a finger at her and saying,

9 "You're a liar" --

10 MR. TEIN: That didn't happen.

11 MR. LEOPOLD: That's fine. But I'm not

12 going to allow her to answer that question,

13 because she's answered that same question and has

14 explained it.

15 Now Counsel might be sitting there rubbing

16 his head with a migraine. That's his problem.

17 But if he can't ask a question appropriately in a

18 professional manner, we will leave. I will not

19 allow her to be berated like that.

20 MR. GOLDBERGER: Actually, we're very happy

21 with the answer.

22 MR. LEOPOLD: That's great.

23 MR. GOLDBERGER: Do you want us to get into

24 that?

25 MR. TEIN: Ted --

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1 MR. LEOPOLD: This is really big stuff that  
2 you're going through. But that's fine; just ask  
3 your question and move on. But do it one time.  
4 If you don't understand it, I'll let you follow  
5 up, but I'm not going to allow you to ask the same  
6 question time and again and then call her a liar.  
7 Just ask the question, get the answer and move to  
8 the next subject matter.

9 MR. TEIN: Ted, I'm sitting right across  
10 the table from you.

11 MR. LEOPOLD: Yes, sir.

12 MR. TEIN: Please be quiet. Don't yell.

13 MR. LEOPOLD: I will not be quiet.

14 MR. TEIN: Stop yelling.

15 MR. LEOPOLD: Lewis, when I'm yelling  
16 you'll know it. I will not --

17 MR. TEIN: My name is not Lewis.

18 MR. LEOPOLD: I thought your first name was  
19 Lewis, Mr. Tein.

20 MR. TEIN: You watched me for three days at  
21 the evidentiary hearing where you sat in the back  
22 of the courtroom. You should know who I am.

23 MR. LEOPOLD: Well, that's the impression  
24 you must have made in the courtroom.  
25 I will not be quiet.

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1 MR. TEIN: That's obnoxious. Stop being  
2 obnoxious. It's stupid. Let's go ahead with the  
3 questions.

4 MR. LEOPOLD: I will make the record.

5 MR. TEIN: Let's get on with the questions.

6 MR. LEOPOLD: Do you need a break?  
7 (Thereupon, a recess was taken.)

8 BY MR. TEIN:

9 Q. Okay. [REDACTED] after you told your manager  
10 at the Quarterdeck Tavern everything that was going on  
11 and he told you he would help you any way he could, he  
12 hid you in the kitchen from the process servers, correct?

13 A. Incorrect.

14 Q. Isn't it true that lying to avoid service  
15 is a meaningless lie to you, [REDACTED]

16 A. Incorrect.

17 Q. What is your manager's name?

18 A. I have three. Would you like to know  
19 all --

20 Q. Who's the one who lied for you?

21 A. [REDACTED]

22 Q. And what did [REDACTED] do to lie for you?

23 A. Said I wasn't there.

24 Q. And who did he tell wasn't there?

25 A. Ask him.

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1 Q. Where were you when [REDACTED] told this  
2 someone that you were not at the Quarterdeck Tavern?

3 A. Eating nachos.

4 Q. At the Quarterdeck Tavern?

5 A. Yes.

6 Q. What did you do so that [REDACTED] would lie to  
7 the process servers for you?

8 A. Nothing.

9 Q. You just got him to lie for you, didn't  
10 you?

11 A. No. I had no influence on him saying I  
12 wasn't there.

13 Q. He took that upon himself?

14 Isn't it true that Mr. Epstein's process  
15 servers had to ask the police to get you out of the  
16 restaurant so that they could serve you?

17 MR. LEOPOLD: Objection. Lack of  
18 foundation, predicate.

19 BY MR. TEIN:

20 Q. You can answer the question.

21 MR. LEOPOLD: If you know. Don't guess.

22 THE WITNESS: No. Can you repeat the  
23 question?

24 MR. TEIN: Don't coach.

25 MR. LEOPOLD: Don't guess.

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1 MR. TEIN: That's a coaching.

2 MR. LEOPOLD: No. That's an instruction to  
3 the client.

4 MR. TEIN: No. You don't do that.

5 THE WITNESS: Can you repeat the question?

6 MR. LEOPOLD: Let me just state for the  
7 record --

8 BY MR. TEIN:

9 Q. Once the police -- isn't it true that  
10 Mr. Epstein's process servers had to ask the police to  
11 get you out of the restaurant so that they could serve  
12 you?

13 A. Incorrect. My boss called the police.

14 Q. And once the police showed up, to stop you  
15 from lying to avoid service, you made up another lie that  
16 the process servers had harassed you. Isn't that  
17 correct?

18 A. Incorrect.

19 Q. You lie all the time, don't you?

20 MR. LEOPOLD: Objection.

21 THE WITNESS: Incorrect.

22 BY MR. TEIN:

23 Q. You have a MySpace page, don't you?

24 A. No longer do I have a MySpace page. I  
25 deleted it.

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1 Q. When did you delete your MySpace page?  
 2 A. A couple days ago.  
 3 Q. Who told you to take your MySpace page down  
 4 a couple of days ago?  
 5 A. Nobody. I'm sick and tired of MySpace.  
 6 Q. You all of a sudden got sick and tired of  
 7 MySpace and just a few days before this deposition you  
 8 decided to delete your MySpace page, correct?  
 9 A. Correct.  
 10 Q. Is that your testimony under oath?  
 11 A. Yes.  
 12 Q. Did you take your MySpace page down because  
 13 you thought the government might subpoena it?  
 14 A. Incorrect.  
 15 Q. Hadn't your MySpace page been up for over  
 16 three months before you took it down?  
 17 A. Correct. But I also had made tons of  
 18 MySpaces over the last years. I just get tired of them  
 19 and delete them because -- drama -- and make new ones.  
 20 Q. We're going to talk about that.  
 21 So you deleted your MySpace page after you  
 22 were already under subpoena for this deposition, correct?  
 23 A. Correct.  
 24 Q. What about the MySpace page didn't you want  
 25 us to see, [REDACTED]?

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1 A. Nothing.  
 2 Q. Well, we're going to come back to MySpace  
 3 in a second.  
 4 A. You do that.  
 5 Q. [REDACTED] I'm going to ask you some questions  
 6 about why you lie about your age so often, okay?  
 7 MR. LEOPOLD: Objection to the form.  
 8 Argumentative.  
 9 BY MR. TEIN:  
 10 Q. You lie about your age all the time, don't  
 11 you?  
 12 MR. LEOPOLD: Objection, argumentative.  
 13 THE WITNESS: Incorrect.  
 14 BY MR. TEIN:  
 15 Q. You lie about your age to get body  
 16 piercings, don't you?  
 17 A. Incorrect.  
 18 Q. You have body piercings, don't you?  
 19 A. Yes.  
 20 Q. You have four body piercings; isn't that  
 21 right?  
 22 A. Five.  
 23 Q. Other than the piercings on your ears --  
 24 I'm not talking about that --  
 25 A. Oh, then no; just one.

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1 Q. And where is the one body piercing?  
 2 A. Belly.  
 3 Q. When did you get that?  
 4 A. For my birthday, with my stepmother and my  
 5 father.  
 6 Q. And when was that?  
 7 A. When I was 14.  
 8 Q. Okay. So you had that body piercing when  
 9 you met Epstein, correct?  
 10 A. It might have been, or maybe that -- yeah,  
 11 either my 14th birthday or my 15th. I honestly don't  
 12 remember.  
 13 Q. Now you've lied about your age to get into  
 14 bars by using driver's licenses that aren't yours,  
 15 correct?  
 16 A. Incorrect.  
 17 Q. Are you swearing under oath that you've  
 18 never done that?  
 19 A. Yes, I swear under oath.  
 20 Q. And you've lied about your age to buy beer,  
 21 correct?  
 22 A. Incorrect.  
 23 Q. You're swearing under oath that you've  
 24 never lied to stores about your age?  
 25 A. I've never lied to a store about my age or

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1 anything.  
 2 Q. You try to look much older than you are,  
 3 don't you?  
 4 A. Incorrect.  
 5 Q. And you've lied about your age on your  
 6 MySpace pages, don't you?  
 7 A. Incorrect.  
 8 Q. All right. Let's look at Exhibit 26-01  
 9 one.  
 10 MS. BELOHLAVEK: 26-001?  
 11 MR. TEIN: Yes.  
 12 BY MR. TEIN:  
 13 Q. On this page you lied to everyone that you  
 14 were 18, didn't you?  
 15 A. Correct.  
 16 Q. Let's go to Exhibit 33.  
 17 MS. BELOHLAVEK: That's 33-001?  
 18 TEIN: Correct.  
 19 BY MR. TEIN:  
 20 Q. On this page you lied to everyone that you  
 21 were 19, didn't you?  
 22 A. Incorrect.  
 23 MR. LEOPOLD: Just answer the question.  
 24 THE WITNESS: Oh, incorrect.  
 25 BY MR. TEIN:

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1 Q. Now you can explain your answer.  
 2 A. I know that I have seen all of these and I  
 3 know that this one is mine.  
 4 Can you go down?  
 5 MR. LEOPOLD: Just for the record, you're  
 6 pointing to the photo.  
 7 THE WITNESS: I'm pointing to --  
 8 BY MR. TEIN:  
 9 Q. You're pointing to the one where it says  
 10 your age is 18?  
 11 A. Correct.  
 12 Q. That's yours, right?  
 13 A. Correct. That's mine from a couple years  
 14 ago that I have not been on, because I don't use that.  
 15 Please keep going down, please. And I think that's it,  
 16 because there's no one -- just that one is mine.  
 17 Q. So the one you pointed to where it says  
 18 your age is 18, that's yours, correct?  
 19 A. Correct.  
 20 Q. And when you wrote 18 as your age on your  
 21 MySpace page, that was a lie, wasn't it?  
 22 A. Correct.  
 23 Q. Did you lie about your MySpace page back  
 24 then because you couldn't post on MySpace unless you were  
 25 18?

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1 A. Correct. There was a rule many years ago  
 2 that you had to be 18 to have a MySpace.  
 3 Q. So you lied about your age so you could  
 4 post on MySpace, right?  
 5 A. Yes.  
 6 Q. Let's go back to the top one on this page,  
 7 33-01.  
 8 Are you testifying now under oath that this  
 9 MySpace page where the headline says, "Twins do have more  
 10 fun," and the location is given as Lox, abbreviation for  
 11 Loxahatchee, and the age is 19, and it says [REDACTED]  
 12 [REDACTED] is it your testimony that you did not post  
 13 that?  
 14 A. Correct.  
 15 Q. Now let's go back to the one that you were  
 16 pointing to before on this page, where it says your age  
 17 is 18 and you lied about your age to post MySpace, okay?  
 18 A. Uh-huh, yes.  
 19 Q. All right. Why did you finally put your  
 20 true age on your MySpace profile four days before you  
 21 were scheduled to testify before the Grand Jury?  
 22 A. I don't know what you're talking about.  
 23 MR. LEOPOLD: If you don't understand, ask  
 24 him to ask the question again.  
 25 MR. TEIN: Don't coach.

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1 THE WITNESS: I don't know which MySpace  
 2 you're talking about.  
 3 BY MR. TEIN:  
 4 Q. The MySpace page that you're just pointing  
 5 to, where it says you were 18.  
 6 A. Yes.  
 7 Q. And you were lying about your age, right?  
 8 A. Uh-huh.  
 9 Q. Why did you finally post your true age on  
 10 your MySpace profile --  
 11 A. Uh --  
 12 Q. -- four days before you were scheduled to  
 13 testify before the Grand Jury?  
 14 A. I honestly don't know which Myspace,  
 15 because I've had like a bazillion Myspaces, and in that  
 16 year, I had two, that one and another one, and that one's  
 17 been deleted. So I don't know which one you're referring  
 18 to.  
 19 Q. You remember that you changed your age on  
 20 your MySpace page from 18 to your true age just four days  
 21 before you went and testified in the Grand Jury?  
 22 A. No.  
 23 Q. You don't remember that.  
 24 A. No.  
 25 Q. Do you remember Detective Recarey? Did you

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1 ever meet a Detective Recarey?  
 2 A. I don't know the names.  
 3 Q. How many different detectives have you met  
 4 with on this case from Palm Beach?  
 5 A. Probably a good six or seven, maybe.  
 6 Q. Did one of the detectives tell you before  
 7 you testified in the Grand Jury that you should take your  
 8 MySpace age and put your true age?  
 9 A. No.  
 10 Q. Didn't Detective Recarey have to come to  
 11 your house to pick you up to get you to testify in front  
 12 of the Grand Jury?  
 13 A. Possibly; maybe because I didn't have a  
 14 ride; I was only 14 or 15 at the time.  
 15 Q. Your mom didn't drive you?  
 16 A. No.  
 17 Q. Stepmom didn't drive you?  
 18 A. I think my dad. Oh, my dad; my dad drove  
 19 me.  
 20 Q. Your dad drove you?  
 21 A. Yes, sir.  
 22 Q. So your testimony is Detective Recarey did  
 23 not drive you, correct?  
 24 MR. LEOPOLD: Objection. /asked and  
 25 answered.

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1 THE WITNESS: No. I'm pretty sure my dad  
2 drove me, because he was there with me.

3 BY MR. TEIN:

4 Q. Did any detective tell you to change your  
5 age on your MySpace page, to put your true age?

6 A. No, sir.

7 Q. Now you also lied on your MySpace page  
8 about your income, didn't you?

9 A. Yes.

10 Q. And you lied, saying that you made a  
11 quarter million dollars a year and higher, correct?

12 A. As a joke, yes.

13 Q. That was a lie, wasn't it?

14 A. Yes.

15 Q. And you also lied on your MySpace page,  
16 saying that you were married, didn't you?

17 A. Possibly. And that might have been an  
18 error on my part.

19 Q. Now you also lie to the police, don't you?

20 A. No.

21 Q. Well, you lied to the police in your  
22 tape-recorded statement that you gave to Detective  
23 Michelle Pagan three years ago, didn't you?

24 A. To my knowledge, no, I did not.

25 Q. Well, you lied to the police when you

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1 accused Mr. Epstein of attempting to murder your father,  
2 didn't you?

3 A. No. I never heard a statement saying that  
4 Mr. Epstein tried to murder my father.

5 Q. You made that statement, didn't you?

6 MR. LEOPOLD: Do you have a statement to  
7 show her? That's been asked and answered.

8 MR. TEIN: I'm sorry. I didn't hear the  
9 witness' answer, Mr. Leopold.

10 BY MR. TEIN:

11 Q. [REDACTED] you told the police, didn't you,  
12 that Mr. Epstein almost killed your father, didn't you?

13 A. No.

14 Q. Three years ago, before Mr. Epstein even  
15 knew about this investigation, you told the police that  
16 Epstein had "already come to my dad's house and did  
17 something to my dad's tires and my dad almost died. I  
18 didn't want my dad to get hurt, because Jeff already  
19 almost killed him."

20 Didn't you say that?

21 A. Not to my knowledge or recollection. I  
22 have never said anything like that.

23 Q. That would have been a complete lie,  
24 wouldn't it have been?

25 A. Yeah.

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1 Q. Because Mr. Epstein never came to your  
2 dad's house, correct?

3 A. Correct.

4 Q. And no one who worked for Mr. Epstein ever  
5 did something to your dad's tires, did they?

6 MR. LEOPOLD: Objection. Lack of  
7 foundation, predicate.

8 Don't guess.

9 BY MR. TEIN:

10 Q. It's not true that Mr. Epstein almost  
11 killed your father, is it?

12 MR. LEOPOLD: Objection. Asked and  
13 answered, lack of foundation, predicate.

14 BY MR. TEIN:

15 Q. You can answer.

16 A. No.

17 Q. Now you told the police that you didn't  
18 know who was in the car with you and [REDACTED] on the day  
19 you went to Epstein's house, didn't you?

20 A. Yes.

21 Q. And that was a lie, wasn't it?

22 A. It's the truth.

23 Q. You told the police that there was someone  
24 in the car next to you and you specifically said you  
25 didn't know her name, right?

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1 A. Correct. I do not know her name.

2 Q. You said, "I don't know her name, but she  
3 was dark like a Spanish girl." Those were your words,  
4 right?

5 A. Yes.

6 MR. LEOPOLD: Objection. Asked and  
7 answered.

8 BY MR. TEIN:

9 Q. Who was in the car that day with you and  
10 [REDACTED]

11 A. Again, I do not know.

12 Q. It was your good friend [REDACTED]  
13 wasn't it?

14 A. No. I don't know a [REDACTED]

15 Q. You lied to the police about who was in the  
16 car with you and [REDACTED], didn't you?

17 A. Incorrect.

18 Q. Let me ask you some questions about who you  
19 may have spoken to about this case. All right?

20 A. Go ahead.

21 Q. Did you speak to your twin sister [REDACTED]?

22 A. Not in detail, but of course she knows  
23 she's family. And yes.

24 Q. What's her e-mail?

25 A. I don't think she has an e-mail.

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1 Q. What is her phone number?

2 A. Oh, gosh. I don't know off the top of my

3 head.

4 Q. And what is her home address?

5 A. She lives with my mom.

6 Q. In Georgia?

7 A. Yes, sir.

8 Q. What about [REDACTED] boyfriend [REDACTED]? Did you

9 speak to him about Epstein's case?

10 A. That's my mom's boyfriend. My sister

11 doesn't have a boyfriend. My mom's husband's name is

12 [REDACTED] so maybe you get them confused.

13 Q. Do you know his phone number?

14 A. No.

15 Q. Where does he live?

16 A. With my mom.

17 Q. In the same house with her?

18 A. Yes. They're married.

19 Q. So not boyfriend; husband?

20 A. Yeah, husband.

21 Q. Have you spoken to [REDACTED] about

22 what happened in Mr. Epstein's house?

23 A. Not in detail, but he knows the basics,

24 yes.

25 Q. What is his e-mail?

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1 A. I don't know.

2 Q. What is his phone number?

3 A. How is that relevant?

4 Q. What is his phone number?

5 A. 561.719.2652.

6 Q. What is his home address?

7 A. I don't know.

8 Q. Where does he live?

9 A. In Palm Beach Lakes somewhere.

10 Q. Ever been to his house?

11 A. Yes.

12 Q. You don't know what his address is?

13 MR. LEOPOLD: Objection. Asked and

14 answered. She just said she doesn't know.

15 MR. TEIN: Don't coach.

16 MR. LEOPOLD: Objection. Asked and

17 answered.

18 BY MR. TEIN:

19 Q. You can answer the question.

20 A. I don't know the exact address.

21 Q. What street is it on?

22 A. It's an apartment complex; its not a

23 street.

24 Q. What's the name of the apartment complex?

25 A. Something Cove.

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1 Q. What apartment number is it?

2 A. I couldn't tell you.

3 Q. When was the last time you went there?

4 A. Just visited this past weekend. That's the

5 first and last time I went there.

6 Q. How about [REDACTED]? Have you spoken

7 to him about your case?

8 A. No. We no longer speak.

9 Q. What's his phone number? Actually, we

10 already have his phone number and e-mail.

11 Q. How about [REDACTED]? Have you ever

12 spoken to her about your case?

13 A. I don't know an [REDACTED]

14 Q. Have you ever met [REDACTED]

15 A. No. But just to let you know, I don't

16 really know names. If you have pictures of there faces I

17 could tell you.

18 Q. All right. Let me see if I can refresh

19 your memory.

20 A. Okay.

21 Q. Does it refresh your memory that [REDACTED]

22 is the other girl who made allegations about Epstein, but

23 refused to show to the Grand Jury when she had to testify

24 about them under oath?

25 A. No, sir. I have no knowledge of any other

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1 girls in this whole situation. We're not allowed to know

2 each other.

3 Q. I didn't get the last four words.

4 A. We're not allowed to know each other.

5 Q. And what about [REDACTED] Have you

6 of met her?

7 A. No, sir.

8 Q. Let's see if I can refresh your memory on

9 her. She's the other person represented by your lawyer

10 Mr. Herman, who is suing Epstein for fifty million

11 dollars.

12 A. I have no knowledge of her.

13 Q. Never met her?

14 A. Never met her.

15 Q. [REDACTED]?

16 A. I don't know who that is either.

17 Q. A person named [REDACTED] who knows [REDACTED]

18 Is that [REDACTED]?

19 A. I don't know, sir.

20 Q. Do you remember making a statement to

21 Detective Pagan that's in the police reports?

22 A. No, sir.

23 Q. Have you read the police reports in this

24 case?

25 A. Yes.

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1 Q. They're on the Internet, right?

2 A. Yes, I think.

3 Q. Were you surprised when the police reports

4 were released on the Internet containing your statements

5 that you had made to the police?

6 A. Yes.

7 Q. You didn't want to see that happen, right?

8 A. No.

9 Q. So you're saying you don't know a [REDACTED]

10 [REDACTED]?

11 MR. LEOPOLD: Objection. Asked and

12 answered.

13 BY MR. TEIN:

14 Q. Does it refresh your memory that he was

15 somebody who had gone to jail for drugs and car theft?

16 A. No, sir.

17 Q. Someone who knows [REDACTED]?

18 A. No.

19 Q. You don't know if he met with Detective

20 Recarey?

21 A. No, sir.

22 Q. How about [REDACTED]?

23 A. Yes, I remember. I know who that is.

24 Q. Did you ever speak to [REDACTED] about what

25 happened at Mr. Epstein's house?

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1 A. He knows what happened four years ago. He

2 doesn't know this is still going on today.

3 Q. What's his address? I'm sorry. I have his

4 address.

5 A. I don't know.

6 Q. How about [REDACTED]?

7 A. [REDACTED]?

8 Q. You know who that is?

9 A. I know who that is, yes.

10 Q. He's the one you stayed out drinking all

11 night one night last year when your dad reported you

12 missing?

13 A. No, sir.

14 Q. Remember the baseball game you were

15 supposed to go to?

16 A. No, sir.

17 Q. Did you speak to [REDACTED] about this

18 case?

19 A. No, sir.

20 Q. How about [REDACTED]?

21 A. That's my sister's ex-boyfriend.

22 Q. He's the one with the sawed-off shotgun

23 with the obliterated serial number?

24 A. Ask him. I would not know that

25 information.

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1 Q. Did you speak to [REDACTED] about this

2 case?

3 A. No, sir.

4 Q. Have you spoken to [REDACTED] about this

5 case?

6 A. No. I don't know who [REDACTED] is.

7 Q. Did your parents speak to [REDACTED]?

8 A. Ask my parents.

9 Q. Let's see if I can refresh your memory as

10 to who he is. Okay?

11 A. Uh-huh.

12 Q. He's the Vanity Fair reporter who made a

13 financial arrangement with your father.

14 A. I am aware of that. And again, I was not

15 aware like that my dad did it until after it was done.

16 And I don't know the details about that. I just know

17 what you know about that, like that they talked.

18 Q. Tell me what you know about the financial

19 arrangement that [REDACTED] the Vanity Fair reporter,

20 made with your father.

21 A. I don't know about the details at all.

22 Q. How much money did [REDACTED] give to

23 your father?

24 A. I don't even know he gave money to my dad.

25 Q. I'm sorry?

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1 A. I didn't even know he gave money to my dad.

2 Q. What do you know about the deal that [REDACTED]

3 [REDACTED] has with your father?

4 A. I only know they spoke on the telephone

5 once. I don't know anything else.

6 Q. When was that?

7 A. This was a while ago, a year or two -- or a

8 year ago. I honestly don't know.

9 Q. Did [REDACTED] the Vanity Fair

10 reporter, offer any money to your father?

11 A. I don't know.

12 Q. Did [REDACTED] the Vanity Fair

13 reporter, give you any money?

14 A. No, sir.

15 Q. Did he offer you any money?

16 A. No, sir. Never spoke to him.

17 Q. What reporters have you spoken to?

18 A. Zero.

19 Q. What about your family members? What

20 reporters have they spoken to?

21 A. The whole Palm Beach County, obviously, as

22 you can see in that newspaper.

23 Q. Tell me -- let's go through each one that

24 you remember. Other than the Vanity Fair reporter, [REDACTED]

25 [REDACTED] what other reporters have any member of your

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1 family spoken to?

2 A. I don't know. And I know my mom has spoken  
3 to zero. My sister spoke to zero. My father and  
4 stepmother, I wouldn't know. You'd have to ask them. I  
5 don't contact them.

6 Q. Well, I just want to know -- I don't want  
7 you to -- I want to know what's in your mind. All right?

8 MR. LEOPOLD: She just told you. She just  
9 answered --

10 MR. TEIN: Be quiet.

11 BY MR. TEIN:

12 Q. What I want to know is what you know from  
13 your personal knowledge. My question to you is: What  
14 knowledge do you have about family members of yours  
15 speaking to reporters?

16 MR. LEOPOLD: Objection. Asked and  
17 answered.

18 And if you can't talk professionally, we're  
19 going to leave.

20 MR. TEIN: Do what you want to do.

21 MR. LEOPOLD: Are you going to continue to  
22 talk this way?

23 MR. TEIN: I'm not going to answer any  
24 question that you ask me, Mr. Leopold.

25 MR. LEOPOLD: Okay.

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1 MR. TEIN: But you are misrepresenting the  
2 record and you are grandstanding for your client  
3 and it's wrong. So be quiet. And you know how to  
4 make an objection. Make it. Otherwise stop  
5 talking.

6 BY MR. TEIN:

7 Q. [REDACTED] --

8 MR. LEOPOLD: Excuse me.

9 MR. TEIN: If you want to leave the  
10 deposition, leave. But you'll be back here.

11 MR. LEOPOLD: Excuse me. If I could just  
12 make the record, instead of interrupting me,  
13 please. That's what we do professionally.  
14 There's a recorder here. I'm certainly not being  
15 obstructionist. I'm going to make the record.  
16 But we're going to act with some semblance of  
17 professionalism, hopefully, by all parties in the  
18 room. That goes to me, that goes to your  
19 co-counsel sitting behind you and next to you, the  
20 court reporter and everyone else in the room.  
21 Everyone is entitled to that.

22 You've asked a question. She answered the  
23 question fully and she's not going to be harassed  
24 because you don't like the answer. If you want to  
25 follow up --

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1 MR. TEIN: Stop engaging me. Make your  
2 speech and then we'll ask the questions.

3 MR. LEOPOLD: Well, you won't let me finish  
4 making the objection, so it's difficult to do  
5 that. But if you want to follow with an  
6 appropriate question, feel free to do that. But  
7 we're not going to harass the witness.

8 MR. TEIN: I disagree with everything  
9 you've said. Let's ask the questions. Okay?

10 MR. LEOPOLD: Ask an appropriate question.

11 MR. TEIN: Are you going to stop talking?

12 MR. LEOPOLD: I'm going to make -- protect  
13 my client and make appropriate objections. But  
14 there's not a question pending right now.

15 BY MR. TEIN:

16 Q. [REDACTED] has [REDACTED] spoken to any reporters?

17 A. No.

18 MR. LEOPOLD: Objection. Asked and  
19 answered.

20 BY MR. TEIN:

21 Q. Has [REDACTED] been given money by any  
22 reporters?

23 A. No.

24 Q. Has your mom spoken to any reporters?

25 MR. LEOPOLD: Objection. Asked and

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1 answered.

2 THE WITNESS: No.

3 BY MR. TEIN:

4 Q. Has your mom's husband [REDACTED] spoken to any  
5 reporters?

6 A. No.

7 Q. Has your mom's husband [REDACTED] received any  
8 money from reporters?

9 A. No.

10 Q. Are you sure you don't know [REDACTED]?

11 MR. LEOPOLD: Objection. Asked and  
12 answered.

13 THE WITNESS: I'm positive.

14 BY MR. TEIN:

15 Q. I'll try again to refresh your memory.

16 A. Okay.

17 Q. Does it refresh your memory that she had  
18 been arrested for drugs and was cooperating with  
19 Detective Recarey against Epstein to get herself a better  
20 deal?

21 A. No. I don't know who she is.

22 Q. Have you spoken to anyone else who's been  
23 at Epstein's house?

24 A. No.

25 Q. Without telling me what was said -- I don't

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1 want to know about any conversations with any lawyers,  
2 okay --  
3 A. Uh-huh.  
4 Q. -- did you or your parents speak to any  
5 other law firms besides Mr. Herman and Mr. Leopold's law  
6 firms?  
7 A. No.  
8 Q. Now without telling me about anything that  
9 was said, what -- did one just come to mind?  
10 A. No. I was thinking about something else.  
11 Q. What were you thinking about?  
12 A. Does family court matter?  
13 Q. Okay. Without telling me what was said,  
14 who prepared you for today's deposition?  
15 A. What do you mean prepared?  
16 Q. Did you talk about this deposition, about  
17 what would happen, with anybody?  
18 A. Yes.  
19 Q. Don't tell me what was said.  
20 A. Okay.  
21 Q. I'm not asking that. I don't want to know  
22 that.  
23 A. Okay.  
24 Q. Who prepared you for today's deposition?  
25 A. Mr. Leopold.

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1 Q. Anybody else?  
2 A. No.  
3 Q. When did you meet with Mr. Leopold to  
4 prepare for today's deposition?  
5 A. This morning.  
6 Q. And how long did that meeting last?  
7 A. Until it started.  
8 Q. Now you told me that you previously had  
9 read the police reports in this case?  
10 A. Yes.  
11 Q. Have you read your statement that you gave  
12 to the police?  
13 A. Yes, sir.  
14 Q. And in what form was that statement?  
15 A. What do you mean?  
16 Q. Was it in the form of a police report or a  
17 transcript?  
18 A. What's the difference?  
19 Q. A transcript has questions and answers on  
20 it. A police report is just typed out narrative.  
21 A. Oh, it's a police report.  
22 Q. And when did you read the police report?  
23 A. A few days ago. I overread it a few days  
24 ago.  
25 Q. Had you read it before that?

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1 A. No.  
2 Q. Now you told me -- again, I don't want to  
3 know what was said.  
4 A. Uh-huh.  
5 Q. You told me that you met with Mr. Leopold  
6 this morning to prepare for your deposition, right?  
7 A. Yes.  
8 Q. When did you set up that meeting with  
9 Mr. Leopold to take place this morning?  
10 A. Gee, like, like five days ago, four days  
11 ago.  
12 Q. So you're aware that Mr. Leopold told us  
13 that he could not start the deposition this morning  
14 because he had a court appearance, correct?  
15 MR. LEOPOLD: Don't answer that question.  
16 Calls for attorney/client communications.  
17 BY MR. TEIN:  
18 Q. Have you seen the letter that Mr. Leopold  
19 wrote to us stating that he -- an e-mail that Mr. Leopold  
20 wrote to Mr. Goldberger stating that he could not be here  
21 this morning because he had a court appearance? Did you  
22 see that e-mail?  
23 MR. LEOPOLD: You can answer that question.  
24 THE WITNESS: No.  
25

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1 BY MR. TEIN:  
2 Q. Have you listened to your tape-recorded  
3 statement to the police?  
4 A. Yes.  
5 Q. Where did you listen to that?  
6 A. In, I think, this building. I don't know.  
7 It was here.  
8 Q. When did you listen to that statement?  
9 A. This morning.  
10 Q. And who was present when you listened to  
11 that statement?  
12 A. Mr. Leopold -- and I forget your name.  
13 MR. GOLDBERGER: Ms. Belohlavek.  
14 THE WITNESS: Ms. Belohlavek.  
15 BY MR. TEIN:  
16 Q. And you hadn't listened to your statement  
17 before that, correct?  
18 A. No, sir.  
19 Q. Have you met with lawyers representing  
20 anyone else suing Epstein?  
21 A. No, sir.  
22 Q. How many times have you spoken to officers  
23 with the Palm Beach Police Department?  
24 A. More than I like can count. It's been  
25 ongoing for four years, so quite a few times.

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1 Q. When was the last time you spoke with  
2 officers of the Palm Beach Police Department?  
3 A. A while ago. I'd say a year ago.  
4 Q. A year ago?  
5 A. Yeah. Maybe a year and a half.  
6 Q. Do you remember Detective Recarey?  
7 A. No.  
8 Q. Do you remember Michelle Pagan, Detective  
9 Pagan?  
10 A. Yes.  
11 Q. How many times have you spoken to Detective  
12 Pagan?  
13 A. She was the only one I spoke to about this  
14 until for some reason she wasn't on the case anymore.  
15 Q. When was that?  
16 A. The first meeting I ever had was with her  
17 and then I think like I met with her like 10 times or 12  
18 times or something like that, and then I didn't get --  
19 another investigator questioned me after that.  
20 Q. And who was that?  
21 A. I don't remember.  
22 Q. And what type of questions did they ask  
23 you?  
24 A. The same.  
25 Q. The same questions all over again?

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1 A. Basically.  
2 Q. How many taped statements have you given to  
3 the police?  
4 A. One that I know of.  
5 Q. Just the one with Detective Pagan?  
6 A. Yes, sir.  
7 Q. How about to the FBI? Did you give any  
8 statements to them?  
9 A. No. Well, actually, I don't really  
10 remember if that was taped or not, to be honest with you.  
11 I had one meeting with them at my house and don't know if  
12 it was taped.  
13 Q. You were interviewed at [REDACTED]  
14 house?  
15 A. No. That was by the lawyer.  
16 Q. Oh, by the lawyer?  
17 A. Uh-huh.  
18 Q. Where did the conversation that you had  
19 with the FBI take place?  
20 A. At my father's residence.  
21 Q. Which is where?  
22 A. On [REDACTED] in Loxahatchee.  
23 Q. On where?  
24 A. [REDACTED] in Loxahatchee.  
25 Q. And when did that take place?

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1 A. I'd have to say like a year and a half ago,  
2 a year ago. It was a long time ago.  
3 (Discussion held off the record.)  
4 MR. TEIN: Tell me the last answer, please.  
5 (Thereupon, a portion of the record was read  
6 by the reporter.)  
7 BY MR. TEIN:  
8 Q. And who was present when the FBI spoke to  
9 you at your father's house?  
10 A. My stepmother was there, but she wasn't  
11 around. She made herself like do other things.  
12 Q. And how many FBI agents were there?  
13 A. I think four.  
14 Q. And you don't remember any of their names?  
15 A. No, sir.  
16 Q. And were there any lawyers there?  
17 A. Not that I know of.  
18 Q. And none of them gave you their cell phone  
19 numbers?  
20 A. No.  
21 Q. And the last time you spoke to the FBI was  
22 a year and a half ago?  
23 A. It was a while ago.  
24 MR. LEOPOLD: Objection. Asked and  
25 answered.

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1 BY MR. TEIN:  
2 Q. And the last time you spoke to the federal  
3 prosecutor's office was when?  
4 A. I don't know.  
5 Q. Did any of the FBI agents tell you that  
6 Marie Villafona had spoken with Mr. Leopold?  
7 A. No.  
8 Q. Did any of the FBI agents tell you that  
9 Marie Villafona had spoken with Mr. Herman?  
10 A. No.  
11 Q. Did any FBI agents tell you that Jeff  
12 Sloman spoke with Mr. Herman?  
13 A. No.  
14 Q. Did any FBI agents tell you that Jeff  
15 Sloman spoke with Mr. Leopold?  
16 A. No.  
17 Q. Do you know whether any of the federal  
18 prosecutors allowed Mr. Herman to review a draft  
19 indictment?  
20 A. I wouldn't know.  
21 Q. Do you know if any of the federal  
22 prosecutors discussed a draft indictment with Mr. Herman?  
23 A. I wouldn't know.  
24 Q. Have you ever e-mailed with any FBI agent  
25 or any federal prosecutor?

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1 A. No.

2 Q. Have you ever text messaged with any FBI

3 agent or any federal prosecutor?

4 A. No.

5 Q. Has the FBI told you about other testimony?

6 A. No.

7 Q. Has the FBI told you about what other girls

8 have said?

9 A. No.

10 Q. Have federal prosecutors told you what

11 other girls have said?

12 A. No.

13 Q. Do you have any way of getting in touch

14 with the FBI if you wanted to get in touch with them?

15 A. No.

16 Q. How about your parents? Do they know how

17 to get in touch with the FBI?

18 A. I don't know.

19 Q. And by your parents, I'm referring to both

20 sets, okay?

21 A. Oh. Well, I'm referring to only my dad,

22 because my mom really doesn't care to know any of this

23 stuff.

24 Q. So the answer would be the same for your

25 mom and [REDACTED]

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1 A. Yeah.

2 Q. Have you spoken to a lawyer named Burt

3 Ocariz about this case?

4 A. No.

5 Q. Do you know who Burt Ocariz is?

6 Let's see if I can refresh your memory.

7 Does it refresh your memory that he's a good friend of

8 Marie Villafona's boyfriend?

9 A. I don't know who Marie Villafona is.

10 Q. Marie Villafona is the lead federal

11 prosecutor that's on the federal part of this case.

12 Okay?

13 A. No.

14 Q. So does it refresh your memory that Ocariz

15 is the good friend of Marie Villafona's boyfriend?

16 A. Not at all.

17 Q. Does it refresh your memory that Villafona

18 tried to get Epstein to pay for Ocariz to represent you

19 in the federal case?

20 A. No.

21 Q. Do you know if Detective Recarey has spoken

22 with your father?

23 A. No.

24 Q. Do you know if Detective Recarey has spoken

25 to your stepmother?

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1 A. No.

2 Q. How about with [REDACTED]

3 A. Yes, I would know; and no, she did not.

4 Q. Let's put up -- let me ask you some

5 questions about the photo that you had posted on your

6 MySpace page before you erased it last week. Okay?

7 A. Okay.

8 MR. TEIN: Do you mind if we close the door

9 a second, please.

10 MR. LEOPOLD: Exhibit number, please.

11 MR. TEIN: Put up 25-005.

12 Hold on a second.

13 MR. LEOPOLD: Don't say anything. She was

14 talking to her counsel.

15 MR. TEIN: Put up 25-006.

16 MR. LEOPOLD: Is that 005 right there?

17 MR. TEIN: Yes.

18 BY MR. TEIN:

19 Q. Who took this photo of you in a warehouse,

20 simulating being gang-raped by a bunch of --

21 MR. LEOPOLD: Objection. Mischaracterizes

22 the photograph, and lack of foundation and

23 predicate.

24 Fully explain if you need to.

25 THE WITNESS: I will.

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1 First off, this is not a warehouse. This

2 is in [REDACTED] garage.

3 Second of all, I'm not being gang-raped.

4 Everyone has their clothing on.

5 Thirdly, if you'd look at all the other

6 pictures in that album, I'm drinking -- what's

7 when you're sick you drink it?

8 BY MR. TEIN:

9 Q. You can't ask questions of your counsel.

10 A. All right. I'm drinking like Sprite. I'm

11 not drinking any kind of alcohol, if you would look at my

12 other pictures in that album.

13 You guys picked the possibly worst pictures

14 out of there to present. And it was just a goofy

15 picture. All of these kids like to be goofy. And that's

16 what we were doing.

17 Q. Who's the man on the left of the picture

18 holding his -- holding a beer bottle as if it were a

19 penis towards your mouth?

20 A. [REDACTED]

21 Q. Who's the man behind you, right up towards

22 your backside, with you bent over?

23 A. That one?

24 Q. The right side, kissing with his mouth.

25 A. That's [REDACTED]

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1 Q. He's the one grabbing towards the groin  
2 area of [REDACTED]  
3 A. Yes.  
4 Q. And there's three other men in the photo.  
5 What are their names? The one on the left with the hat?  
6 A. That's [REDACTED] (phonetic).  
7 Q. Smiling?  
8 A. Yes.  
9 Q. Who's the one kissing --  
10 MR. LEOPOLD: Don't interrupt. Let her  
11 finish the record. She's testifying.  
12 MR. TEIN: I know you don't like this  
13 picture, my friend.  
14 MR. LEOPOLD: The picture is fine.  
15 BY MR. TEIN:  
16 Q. Who's the one with the hat?  
17 MR. LEOPOLD: No. Hold on. Stop, [REDACTED]  
18 You have to let the witness finish her  
19 answer. She was in the process of explaining and  
20 you cut her off.  
21 Please finish what you were saying and then  
22 Counsel can ask you whatever he wishes after that.  
23 THE WITNESS: Okay. This guy --  
24 MR. LEOPOLD: Just make it so the record is  
25 clear who you're referring to.

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1 THE WITNESS: -- on the far left is [REDACTED]  
2 [REDACTED]  
3 BY MR. TEIN:  
4 Q. He's the one whose head is near the groin  
5 of [REDACTED] right?  
6 A. Yes.  
7 Q. And in the middle there's a man smiling.  
8 Who's that?  
9 A. That's [REDACTED]  
10 Q. And who's the one in the red hat, kissing?  
11 A. That's [REDACTED] (phonetic).  
12 Q. Let me stop you for a second. Are you  
13 done?  
14 A. Yes, I'm done.  
15 Q. Who is [REDACTED]?  
16 A. My sister's friend. Well, she's a mutual  
17 friend, but more my sister's.  
18 Q. What is her last name?  
19 A. [REDACTED]  
20 Q. Spell that.  
21 A. I don't know how to --  
22 Q. Have you spoken to her about this case?  
23 A. No.  
24 Q. Who's [REDACTED]  
25 A. My sister's friend. I don't really speak

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1 to him at all.  
2 Q. What's his last name?  
3 A. [REDACTED]  
4 Q. [REDACTED]  
5 A. [REDACTED]  
6 Q. And have you spoken to [REDACTED] about this  
7 case?  
8 A. No, sir.  
9 Q. Have you spoken to [REDACTED] about this case?  
10 A. Not in detail, but yes.  
11 MS. BELOHLAVEK: Are we referring to  
12 [REDACTED]  
13 THE WITNESS: Yes.  
14 MR. TEIN: Yes.  
15 MS. BELOHLAVEK: Okay.  
16 BY MR. TEIN:  
17 Q. Have you spoken to [REDACTED] about this case?  
18 A. [REDACTED]  
19 Q. Do you have a friend named [REDACTED]  
20 A. I do not have a friend named [REDACTED]  
21 Q. From freshman year?  
22 A. No.  
23 Q. How about [REDACTED]  
24 A. No.  
25 Q. Have you spoken to [REDACTED] about this case?

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1 A. No.  
2 Q. What's her last name?  
3 A. [REDACTED] I don't know how to spell it.  
4 Q. Is she the person whose house you went to  
5 on New Year's this year?  
6 A. No. I wasn't at her house on New Year's.  
7 Q. Where were you when you took the picture of  
8 "Can you say blazed," that's on your website?  
9 A. I wouldn't know or -- wait. We were at a  
10 birthday party for some girl's 16th birthday.  
11 Q. Were you drinking at that party?  
12 A. No. There was no alcohol or anything  
13 there.  
14 Q. What does "blaze" mean to you?  
15 A. It's like -- it just means like messed up.  
16 But we weren't, if you look at the picture.  
17 Q. Messed up like drunk, right?  
18 A. Sure.  
19 Q. Who's [REDACTED]  
20 A. A girl I know, like from like two years  
21 ago.  
22 Q. She's the one you were supposed to be  
23 staying with when you went drinking with [REDACTED]  
24 A. No.  
25 Q. What's [REDACTED] last name?

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1 A. [REDACTED]  
 2 Q. Where does she live?  
 3 A. I don't know. In Royal Palm.  
 4 Q. [REDACTED]  
 5 A. Uh-huh. I'm guessing.  
 6 Q. Do you know her phone number?  
 7 A. No, I do not.  
 8 Q. Let's look at 25-010.  
 9 A. See, I'm drinking --  
 10 Q. I'm not asking you about what you're  
 11 drinking.  
 12 Who are the men in this photo who are  
 13 pretending to gang up on you and stab you with knives?  
 14 Who are they?  
 15 A. [REDACTED] and [REDACTED]  
 16 Q. Are these firemen?  
 17 A. Are those? [REDACTED] -- he said the  
 18 two stabbing with knives. That's why I said that. I  
 19 don't know. That's [REDACTED] and [REDACTED]  
 20 Q. Are these firemen?  
 21 A. No. They're all on -- except [REDACTED]  
 22 they're all on full rights for football.  
 23 Q. Go to 025-015.  
 24 MR. LEOPOLD: 025 dash?  
 25 MR. TEIN: 015.

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1 THE WITNESS: Gosh, that's so long ago.  
 2 BY MR. TEIN:  
 3 Q. Who took the photo of you licking the  
 4 penis?  
 5 A. My stepmother.  
 6 Q. Whose idea -- that was your stepmother's  
 7 idea?  
 8 A. It was in Buca di Beppo, where she works  
 9 currently, and that was before she worked there. And we  
 10 just thought it would be funny.  
 11 MR. TEIN: 19-007. Can you enlarge that?  
 12 BY MR. TEIN:  
 13 Q. Who took this photo of you simulating you  
 14 having sex with a man?  
 15 A. We're not simulating having sex, and  
 16 it's -- oh, and the person who took it was, I'm pretty  
 17 sure, [REDACTED] but I know him as [REDACTED] I don't know his  
 18 last name.  
 19 Q. Go to 19-006, please.  
 20 Who took this photo of you simulating sex  
 21 with a man?  
 22 A. The same person. And we're not simulating  
 23 having sex, Mr. --  
 24 Q. Tein.  
 25 Did you post that on the Internet?

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1 A. Actually, this is an old MySpace I never  
 2 finished and I never like did anything. I just kind of  
 3 made it and left it.  
 4 Q. So the answer is yes, you posted this on  
 5 MySpace?  
 6 A. Yup.  
 7 Q. Go to 25-016. Who took this photo of you  
 8 simulating sex with a woman?  
 9 MR. LEOPOLD: Object to the form of the  
 10 question. Argumentative.  
 11 THE WITNESS: First off, she's piercing my  
 12 belly button or repiercing it, and I'm pretty sure  
 13 it was just like we put up a camera somewhere and  
 14 put a timer on it. We didn't have anybody take  
 15 it.  
 16 BY MR. TEIN:  
 17 Q. You posted that on your MySpace page?  
 18 A. Yeah.  
 19 Q. Go to 25-013. Is that a photo of you?  
 20 A. Yep.  
 21 Q. Who's in the photo with you?  
 22 A. [REDACTED]  
 23 Q. [REDACTED]  
 24 A. Yep.  
 25 Q. Is this you coming out of the shower?

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1 A. Yes.  
 2 Q. Are you clothed in this picture?  
 3 A. Yeah. I have a halter dress on.  
 4 Q. Where is that picture taken?  
 5 A. In [REDACTED] house.  
 6 Q. Did you post that on the Internet?  
 7 A. Yes.  
 8 Q. All right.  
 9 MR. TEIN: You can take that down.  
 10 BY MR. TEIN:  
 11 Q. Now your boyfriend is [REDACTED]  
 12 correct?  
 13 A. Yeah.  
 14 Q. You lie about your age in order to conceal  
 15 something about your relationship with [REDACTED]  
 16 isn't that correct?  
 17 A. No.  
 18 Q. [REDACTED] 22 years old, isn't he?  
 19 A. Yes.  
 20 Q. And [REDACTED] is a firefighter with the Palm  
 21 Beach Fire Department, right?  
 22 A. Yup.  
 23 Q. Does the Palm Beach Fire Department know  
 24 that your boyfriend is dating an underage girl?  
 25 A. Actually, mister, it's legal.

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1 Q. Well --

2 MR. LEOPOLD: Just answer the question,

3 [REDACTED]

4 THE WITNESS: Yes.

5 BY MR. TEIN:

6 Q. Did they know two weeks ago that you were

7 dating an underage girl (sic)?

8 A. Yes. I met everybody in there.

9 Q. Did they know your age?

10 A. Yes.

11 Q. Did you lie about your age so that the fire

12 department wouldn't think that [REDACTED] is committing a

13 crime by having a sexual relationship with an underage

14 girl?

15 MS. BELOHLAVEK: Objection. Assumes facts

16 not in evidence.

17 BY MR. TEIN:

18 Q. You can answer the question.

19 A. No.

20 Q. Does the Palm Beach Police Department know

21 that [REDACTED] is having a sexual relationship with an

22 underage girl?

23 MR. LEOPOLD: Don't guess. Answer if you

24 know.

25 THE WITNESS: Can you repeat the question?

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1 BY MR. TEIN:

2 Q. Does the Palm Beach Police Department know

3 that [REDACTED] a member of the Palm Beach Fire Department,

4 is having a sexual relationship with an underage girl?

5 A. I'm guessing no.

6 Q. You lie about your twin sister [REDACTED] don't

7 you?

8 MR. LEOPOLD: Objection. Argumentative.

9 BY MR. TEIN:

10 Q. Don't you?

11 A. No. I have never lied for or to [REDACTED]

12 Q. You lie about the fact that she has a drug

13 habit, right?

14 A. No. I would never accuse my sister of

15 having a drug habit.

16 Q. Do you try to conceal the fact that she has

17 a drug habit?

18 MR. LEOPOLD: Objection. Argumentative.

19 BY MR. TEIN:

20 Q. You can answer the question.

21 A. No. My sister does not have a drug habit.

22 Q. You lied when you went to the crack house

23 in Georgia, didn't you?

24 MR. LEOPOLD: Objection. Argumentative.

25 Lack of foundation, lack of predicate.

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1 THE WITNESS: Never -- what did you say?

2 BY MR. TEIN:

3 Q. You lied when you went to the crack house

4 in Georgia, didn't you?

5 MR. LEOPOLD: Objection. Argumentative.

6 Lack of foundation, lack of predicate.

7 BY MR. TEIN:

8 Q. You can answer the question.

9 A. I have never been to a crack house.

10 Q. Who don't you lie to?

11 MR. LEOPOLD: Objection. Argumentative.

12 Don't answer the question.

13 MR. TEIN: Certify it.

14 .....CERTIFIED QUESTION.....

15 BY MR. TEIN:

16 Q. You don't lie to [REDACTED] do you?

17 MR. LEOPOLD: Objection. Asked and

18 answered.

19 Don't answer the question.

20 BY MR. TEIN:

21 Q. No. You can answer that question.

22 MR. LEOPOLD: No. I just told her not to.

23 You've asked that question about five --

24 MR. TEIN: No, I haven't.

25 MR. LEOPOLD: Don't answer the question.

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1 MR. TEIN: I'll certify it.

2 .....CERTIFIED QUESTION.....

3 MR. LEOPOLD: For the record, you have to

4 stop interrupting me because she can't take down

5 both of us talking at the same time.

6 BY MR. TEIN:

7 Q. You tell [REDACTED] the truth, don't you?

8 A. Excuse me?

9 Q. You tell [REDACTED] the truth, don't you?

10 A. When it's -- yes, I tell [REDACTED] the truth.

11 Q. Who's [REDACTED] drug dealer?

12 A. My sister does not have a drug dealer. She

13 lives in Georgia with my mother.

14 Q. Okay. Who is the drug dealer who dropped

15 you and [REDACTED] off at 5:45 a.m., in 2006, after being out

16 all night, the two of you, using drugs at Palm Beach

17 Country Estates where your father called the police?

18 A. [REDACTED]

19 Q. He's the drug dealer?

20 A. He is a drug dealer.

21 Q. Do you remember [REDACTED] was arrested by the

22 Palm Beach Police Department and taken to the Juvenile

23 Assessment Center that morning?

24 A. I do remember that.

25 Q. Now before you massaged Epstein, you were

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1 involuntarily admitted into a juvenile educational  
2 facility; isn't that right?  
3 A. Did you say involuntarily?  
4 Q. Yes.  
5 A. No. I was willing to go. I -- duly said  
6 sure.  
7 Q. And you went there because you were lying  
8 so much, no one could control you; isn't that correct?  
9 A. That's very incorrect.  
10 Q. Now you lie to your parents all the time,  
11 don't you?  
12 A. Incorrect.  
13 MR. LEOPOLD: Objection. Argumentative.  
14 BY MR. TEIN:  
15 Q. Sorry?  
16 A. Incorrect.  
17 Q. The day you went to Epstein's house you  
18 lied to your father about where you were going; isn't  
19 that correct?  
20 A. Correct.  
21 Q. You admitted to the police that you told  
22 your father that you were going shopping, didn't you?  
23 A. Yes.  
24 Q. And that was a lie, wasn't it?  
25 A. Yes.

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1 Q. And isn't it true that your father has  
2 accused you of lying?  
3 A. All the time.  
4 Q. Didn't your father throw you out of the  
5 house Thanksgiving of this past year because you were  
6 lying so much to him?  
7 A. Yes, he did kick me out. No, that's not  
8 the reasons why.  
9 Q. Didn't your father throw your sister [REDACTED]  
10 out of the house, too?  
11 A. Yes.  
12 Q. And he threw her out of the house the week  
13 after Thanksgivings, right?  
14 A. I don't know the date, but sure.  
15 Q. Sounds about right?  
16 A. Sure.  
17 Q. And the reason he threw her out of the  
18 house was because she was lying, too?  
19 MR. LEOPOLD: Objection. Lack of  
20 foundation. Calls for speculation.  
21 BY MR. TEIN:  
22 Q. When your counsel coaches you, you say it's  
23 correct, right?  
24 A. I've never been coached.  
25 MR. LEOPOLD: Objection.

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1 BY MR. TEIN:  
2 Q. Okay. When your counsel that it was there  
3 was lack of foundation, you agree with your counsel,  
4 right?  
5 A. I was like saying, "Yeah, let's move on,"  
6 because there was no point to asking that question.  
7 Q. Your father threw [REDACTED] out of the house  
8 because she was lying, correct?  
9 MR. LEOPOLD: Objection. Lack of  
10 foundation.  
11 Hold on, [REDACTED] Let me just make the  
12 objection.  
13 Lack of foundation, predicate, calls for  
14 speculation.  
15 BY MR. TEIN:  
16 Q. Answer.  
17 A. I'm not my sister. I don't know.  
18 Q. I want to know what you know only.  
19 A. I don't know.  
20 Q. You don't know. That's your answer?  
21 A. Yes.  
22 Q. Now your parents filed the police report  
23 regarding Mr. Epstein, right?  
24 A. Yes.  
25 Q. Now your parents are also lying, aren't

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1 they?  
2 A. Yes.  
3 MR. LEOPOLD: Just so the record is clear,  
4 the father -- because the mother was up north.  
5 MR. TEIN: Don't testify, Counsel.  
6 MR. LEOPOLD: So the record is clear, just  
7 the father. The mother was --  
8 MR. TEIN: Counsel, don't coach and  
9 testify, please. That's absolutely improper.  
10 MR. LEOPOLD: You just asked the wrong  
11 question.  
12 MR. TEIN: You can't coach her that way and  
13 you well know it.  
14 MR. LEOPOLD: For the record, it's the  
15 father. He's remarried, I think on his third  
16 marriage.  
17 MR. TEIN: You cannot -- it's absolutely,  
18 totally against the rules and you know it.  
19 MR. LEOPOLD: The natural mother lives in  
20 Georgia.  
21 MR. TEIN: You need to behave yourself,  
22 lawyer.  
23 MR. LEOPOLD: The natural mother lives in  
24 Georgia. The father is here locally.  
25 MR. TEIN: Stop coaching. Stop talking.

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1 You object. You know the rules. You just  
2 lectured me about the rules, Counsel. So why  
3 don't you play by the rules? Or only when they  
4 fit you? Why don't you grandstand a little more  
5 now. Give us a five-minute speech, Mr. Leopold.  
6 MR. LEOPOLD: Are you finished, for the  
7 record?  
8 MR. TEIN: I'm not talking to you. Do what  
9 you want.  
10 MR. LEOPOLD: Don't say anything yet.  
11 BY MR. TEIN:  
12 Q. [REDACTED] your parents --  
13 MR. LEOPOLD: Hold it. Don't say anything  
14 yet. Let me --  
15 BY MR. TEIN:  
16 Q. Your parents, who filed the police report  
17 are also liars.  
18 MR. LEOPOLD: Don't answer the question.  
19 We're not going to answer until I make the record.  
20 I want to put on the record, now that Counsel  
21 appears to be finished with his comments for the  
22 record, that the previous question was  
23 inappropriate, was intentionally misleading.  
24 Now you can ask the question.  
25 BY MR. TEIN:

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1 Q. Your parents, who filed the police report  
2 in this case, are also proven liars, aren't they?  
3 MR. LEOPOLD: Same objection.  
4 BY MR. TEIN:  
5 Q. Aren't your parents liars?  
6 MR. LEOPOLD: Calls for speculation. Lack  
7 of predicate.  
8 MR. TEIN: Stop coaching. You know what  
9 that is, Leopold.  
10 MR. LEOPOLD: Calls for speculation. Lack  
11 of foundation.  
12 THE WITNESS: When you say parents, my mom  
13 is not, but sure, yeah, my dad has been to jail  
14 for lying.  
15 BY MR. TEIN:  
16 Q. Your dad went to federal prison for two  
17 years for lying, right?  
18 A. Correct.  
19 Q. Did he tell you it was for a financial  
20 fraud?  
21 A. Yes.  
22 Q. For stealing money from some financial  
23 institution?  
24 A. Correct.  
25 Q. And do you think your father is trying to

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1 steal your lawsuit money away from you?  
2 Don't look to your lawyer for the answer.  
3 MR. LEOPOLD: You can answer if you know  
4 the answer to it. I have no idea.  
5 THE WITNESS: Yeah.  
6 BY MR. TEIN:  
7 Q. And your father filed a lawsuit, the first  
8 lawsuit for fifty million dollars against Mr. Epstein  
9 without consulting you, correct?  
10 A. Correct.  
11 Q. And your father had a lawyer file the first  
12 lawsuit on your behalf for fifty million dollars against  
13 Mr. Epstein without your knowledge, correct?  
14 A. Correct.  
15 Q. And you don't trust your father, do you?  
16 A. Correct.  
17 Q. And you believe he's trying to manipulate  
18 you for his own gain, don't you?  
19 A. Sort of.  
20 Q. Well, you know that your mother filed a  
21 statement, an affidavit, saying that you don't trust your  
22 father and that you believe he's trying to manipulate you  
23 for his own gain; isn't that correct?  
24 A. Correct.  
25 Q. You agree with that statement, don't you?

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1 A. Uh-huh. Yes.  
2 Q. Do you trust your stepmother?  
3 A. My stepmother, no.  
4 Q. You think she's also trying to steal your  
5 Epstein lawsuit money away from you, don't you?  
6 A. I would like to clarify something. You  
7 keep saying my Epstein lawsuit money. I don't have any  
8 money, and it's just a lawsuit at the moment. So I just  
9 don't trust her.  
10 Q. Okay. You think that your stepmother is  
11 trying to take advantage of this lawsuit to try to get  
12 money from Mr. Epstein that belongs to you, right?  
13 A. Yes.  
14 Q. Did your stepmother tell you why she was  
15 arrested?  
16 A. No.  
17 Q. Did your stepmother tell you that she's  
18 ever been arrested?  
19 A. No.  
20 Q. Did she tell you she was arrested for  
21 fraud?  
22 A. Never.  
23 Q. Did she tell you that she was fired from  
24 Hawthorne Aviation?  
25 A. No.

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1 Q. Did she tell you that she was fired from  
2 Hawthorne Aviation for stealing?  
3 A. No.  
4 MR. TEIN: Let's take a break.  
5 (Thereupon, a recess was taken.)  
6 BY MR. TEIN:  
7 Q. [REDACTED] before you met Jeffrey Epstein, had  
8 you ever had sexual intercourse?  
9 A. Yes, yeah.  
10 Q. How many times?  
11 A. Just a few. Twice.  
12 Q. With how many different men?  
13 A. Two.  
14 Q. How old were they?  
15 A. [REDACTED] being one year older than me,  
16 and then the other person was two years older than me.  
17 Q. What was his name?  
18 A. [REDACTED]  
19 Q. How old were you when you first had sexual  
20 intercourse?  
21 A. 14.  
22 Q. How many -- before you met Epstein, how  
23 many different men had you had any type of sexual  
24 activity with?  
25 A. Just those two.

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1 Q. Are you saying you never kissed a man other  
2 than those two?  
3 MR. LEOPOLD: Objection to the form of the  
4 question.  
5 THE WITNESS: Yes, I had kissed people  
6 before.  
7 BY MR. TEIN:  
8 Q. Before you met Epstein, had you ever had  
9 oral sex?  
10 A. No.  
11 Q. Ever in your life, have you exchanged sex  
12 for something of value?  
13 A. No.  
14 MR. TEIN: We're done.  
15 THE WITNESS: Oh, okay.  
16 MR. LEOPOLD: We'll read.  
17 MS. BELOHLAVEK: I don't have any  
18 questions. Thank you.  
19 MR. LEOPOLD: Before we go off the record,  
20 it's my understanding -- Mr. Goldberger can  
21 correct the record -- but we have stipulated that  
22 color copies of the documents that were identified  
23 for identification certainly will be attached to  
24 the deposition and counsel will be taking the  
25 photographs across street so that they can be

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1 laser color copied so that we have a copy, and I'm  
2 assuming he'll get a copy to the court reporter,  
3 too, to attach, actually a certified copy to the  
4 deposition.  
5 MR. GOLDBERGER: Done.  
6 MR. LEOPOLD: That's if you agree to that.  
7 If not, then I want to pull each one out and put  
8 exhibit labels on them, which we should do before  
9 we leave.  
10 MR. GOLDBERGER: We're not going to do  
11 either. I'll have copies sent to the court  
12 reporter and she can attach them to the  
13 deposition.  
14 MR. LEOPOLD: So you're not going to agree  
15 to what we talked about during the break then.  
16 MR. GOLDBERGER: I'm not quite sure what  
17 your asking me to do. Let me finish.  
18 MR. LEOPOLD: Okay. Sure. That's fine.  
19 MR. GOLDBERGER: Okay. If you want me to  
20 go over to Ms. Belohlavek's office and make copies  
21 and then I'll give those to the court reporter,  
22 fine. All I'm saying is that I would avoid that  
23 process. I would send copies to the court  
24 reporter. But if it will make you happier --  
25 MR. LEOPOLD: I'm not?

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1 MR. GOLDBERGER: Let me finish.  
2 MR. LEOPOLD: I'm not interrupting now.  
3 MR. GOLDBERGER: But if it will make you  
4 happier if I go over to Ms. Belohlavek's office  
5 and make a copy of those photos that were part of  
6 this deposition and then I'll give them to the  
7 court reporter, I'll be happy to do it.  
8 MR. LEOPOLD: I trust you implicitly,  
9 however you wish to do it. However, the  
10 documents, before they leave this room, need to  
11 have an exhibit sticky on them with the  
12 appropriate --  
13 MR. GOLDBERGER: Want to go get some? We  
14 don't have any.  
15 MR. LEOPOLD: I will do that. Excuse me.  
16 Let me finish the record, please. You can't do  
17 that to the court reporter. She's going to stroke  
18 out. You can't do that. You have to let me --  
19 MR. TEIN: Finish your sentence, Ted. You  
20 are the most long-winded lawyer I've ever seen in  
21 my life. Finish your sentence.  
22 MR. LEOPOLD: Jack, tell him not to raise  
23 his voice, please.  
24 MR. TEIN: Finish your sentence. Is there  
25 going to be a period at the end of the sentence or

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1 is it just going to be comma after comma after  
2 comma?  
3 Go ahead, lawyer.  
4 MR. LEOPOLD: All right. The exhibits, I  
5 can't prevent you from taking them, but I will  
6 object and I will be bringing it to the court for  
7 sanctions. You cannot take the exhibits out of  
8 the room without them being marked. I want them  
9 marked, because you cannot identify in the record  
10 what was used. And with all due respect to  
11 Mr. Goldberger, I do not -- the way this  
12 deposition is going, I do not want to rely on  
13 Counsel from Miami to mark the appropriate  
14 exhibits. I will not do that. I cannot prevent  
15 you from taking them. But if you do, I will be  
16 bringing the matter to the court with appropriate  
17 sanctions, because that is improper. That is  
18 improper. When you use something in a deposition,  
19 they are to be marked. And you have refused to do  
20 that throughout for what ever reason.  
21 MR. TEIN: You're wrong. Finish your  
22 sentence because you're talking about something  
23 you have no idea.  
24 Every single one is marked, Ted. Every  
25 single one is already marked. But you want to

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1 argue about everything. Ever single one is  
2 already marked. Isn't that silly, Ted?  
3 MR. GOLDBERGER: Thirty years of doing this  
4 and I have never had an argument over this.  
5 MR. TEIN: You've made -- Ted, you are  
6 obstructionist, you are a liar. You have lied and  
7 misrepresented things, for the record. You are  
8 grandstanding.  
9 MR. LEOPOLD: You need to back up.  
10 MR. TEIN: No, no. I'm going to finish.  
11 MR. LEOPOLD: You can finish, but don't  
12 hover over me.  
13 MR. TEIN: No one is hovering over you.  
14 Stop trying to make a lying record.  
15 Let me say something else.  
16 Don't you dare threaten me with sanctions,  
17 after you lied in a letter to my co-counsel about  
18 the fact -- be quiet. Be quiet and let me finish.  
19 You lied in a letter to my co-counsel,  
20 Mr. Leopold, in which you said -- it was a  
21 complete and utter lie -- that you were  
22 unavailable this morning because you had a  
23 hearing. That was a lie. I have never seen a  
24 lawyer deign to do something like that.  
25 So you will get the ex -- be quiet. Let me

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1 finish. You behave.  
2 MR. LEOPOLD: Don't point your finger at  
3 me.  
4 MR. TEIN: Listen. Be quiet and I won't  
5 have a need to point it at you.  
6 MR. LEOPOLD: Don't point your finger at --  
7 MR. TEIN: Mr. Leopold --  
8 MR. LEOPOLD: Don't point your finger at  
9 me.  
10 MR. TEIN: Mr. Leopold, let me finish.  
11 MR. LEOPOLD: Don't raise your voice  
12 either.  
13 MR. TEIN: Mr. Leopold --  
14 MR. LEOPOLD: Jack, do you want to take  
15 care of this?  
16 MR. TEIN: Let me finish my sentence. The  
17 exhibits are marked. We are walking out of here.  
18 You are someone who misrepresents the  
19 record. It is absolutely atrocious what you do.  
20 That is not how a lawyer should behave. This  
21 deposition is over. You will get your exhibits,  
22 Mr. Leopold.  
23 MR. GOLDBERGER: I understand what you're  
24 saying, Michael, and I understand Ted's position.  
25 Just so there's -- we're going to have lots

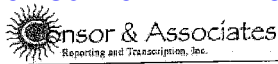
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1 of issues in this case. We're going to have lots  
2 of reasons to disagree.  
3 I'm going to take it over now and I'm going  
4 to make copies and I'm going to give them to  
5 Ms. Consor. If you want to go find some exhibit  
6 labels and put some exhibit labels on it, be my  
7 guest. But that's what I'm offering to do.  
8 THE WITNESS: Let me say two things,  
9 because I am happy to always disagree, and with  
10 you, I have no problem; we could always do it  
11 professionally. I have not problem.  
12 I want to say two things so the record is  
13 very clear.  
14 Since for whatever reason I have not been  
15 able to look at exhibits, because they have been  
16 refused to have been shown to me --  
17 MR. TEIN: That's a lie.  
18 MR. LEOPOLD: -- Jack, if you represent  
19 that the documents have the appropriate exhibit  
20 numbers or some identifying markings, 25, 30,000,  
21 whatever they may be, then you can take them, make  
22 copies, send me a copy, make sure the court  
23 reporter gets a copy and then send me a bill for  
24 my copies, that's fine. I didn't know that they  
25 are marked that way because I haven't been able to

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1 look at them.

2 MR. GOLDBERGER: They are barcoded, and the  
3 number that we've made reference to in the  
4 deposition coincides with the barcoding.

5 MR. LEOPOLD: That's fine. Eight by eleven  
6 color laser copies are fine.

7 MS. BELOHLAVEK: The State Attorneys Office  
8 is not going to charge anybody for color copies I  
9 print out.

10 MR. LEOPOLD: That's fine. He's going to  
11 take them back to his office.

12 Secondly -- and I will be more than happy  
13 to do it, because it sounds like you all know more  
14 about it than I -- but I'm happy to get affidavits  
15 from Mr. Pincus, Judge Stern, everybody else about  
16 what happened with this hearing today, because I  
17 know very little about it. But my representations  
18 are what they are.

19 MR. GOLDBERGER: They stay --

20 MR. LEOPOLD: Let me just finish for the  
21 record.

22 My representations or comments about what  
23 happened, representation about this hearing this  
24 morning, I know very little about it. I --

25 MR. GOLDBERGER: I'll take your word on

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1 that.

2 MR. LEOPOLD: No, no, no. I just put it on  
3 the record. I will get an affidavit -- I'm  
4 assuming it sounds like you need it -- from Mr.  
5 Pincus. I have no clue about what happened and  
6 why it was canceled. All I was told when I was  
7 out of town yesterday was that the hearing this  
8 morning was cancelled.

9 MR. GOLDBERGER: I'll take your word for  
10 it.

11 MR. LEOPOLD: If you want an affidavit,  
12 I'll get it for you.

13 MR. GOLDBERGER: It's a personal issue for  
14 me because I had to disrupt a vacation and if it  
15 was done just because it wasn't convenient for  
16 you, then I'm offended by that. But if you're  
17 telling me that it was planned and it didn't  
18 happen, I'll take your word for it.

19 MR. LEOPOLD: I am more than happy to get  
20 you an affidavit, because I don't know the reason  
21 why it was canceled other than the fact that I'm  
22 assuming since my deposition was taken for four  
23 hours on Monday for preparation for the hearing  
24 today, for whatever reason it was canceled, I am  
25 told it is being re-noticed. Why it was canceled,

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1 I have no idea, but if your co-counsel wishes an  
2 affidavit to that effect from Mr. Pincus, I'm more  
3 than happy to get it. But I don't know the reason  
4 why it was canceled.

5 MR. TEIN: I don't need it. But what I do  
6 take issue with is regardless of why it was  
7 canceled, you owed us the courtesy of saying, You  
8 know what? We can start earlier this morning.

9 MR. LEOPOLD: I owe you nothing.

10 MR. TEIN: I don't care. Don't interrupt  
11 me.

12 Because Jack canceled his vacation plans  
13 because of you.

14 MR. GOLDBERGER: That's all right, that's  
15 all right.

16 MR. TEIN: And you're selfish. And this  
17 deposition is over. Good-by Mr. Leopold.

18 MR. GOLDBERGER: You can go off the record.  
19  
20  
21  
22  
23  
24  
25

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# 1 CERTIFICATE

2  
3  
4 The State of Florida, )  
5 County of Palm Beach. )  
6

7 I hereby certify that I have read the  
8 foregoing deposition by me given, and that the statements  
9 contained herein are true and correct to the best of my  
10 knowledge and belief, with the exception of any  
11 corrections or notations made on the errata sheet, if one  
12 was executed.

13  
14  
15 Dated this \_\_\_\_ day of \_\_\_\_\_, 2008.  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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DATE: February 25, 2008  
 TO: [REDACTED]  
 c/o LANA BELOHLAVEK  
 Office of the State Attorney  
 401 N. Dixie Highway  
 West Palm Beach, Florida 33401  
 IN RE: STATE OF FLORIDA -V- JEFFREY EPSTEIN  
 CASE NO.: 2006 CF09454AXX

Please take notice that on Wednesday, the 20th of February, 2008, you gave your deposition in the above-referred matter. At that time, you did not waive signature. It is now necessary that you sign your deposition.

Please call our office at the below-listed number to schedule an appointment between the hours of 9:00 a.m. and 4:30 p.m., Monday through Friday.

If you do not read and sign the deposition within a reasonable time, the original, which has already been forwarded to the ordering attorney, may be filed with the Clerk of the Court. If you wish to waive your signature, sign your name in the blank at the bottom of this letter and return it to us.

Very truly yours,

Judith F. Consor, FPR  
 Consor & Associates Reporting and Transcription  
 1655 Palm Beach Lakes Boulevard, Suite 500  
 West Palm Beach, Florida 33401

I do hereby waive my signature:

cc via transcript: JACK A. GOLDBERGER, ESQ.  
 LANA BELOHLAVEK, ESQ.  
 MICHAEL R. TEIN, ESQ.  
 THEODORE J. LEOPOLD, ESQ.  
 file copy

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## ERRATA SHEET

IN RE: STATE-V-JEFFREY EPSTEIN  
 DEPOSITION OF: [REDACTED] TAKEN: February 20th, 2008

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

PAGE # LINE # CHANGE REASON

Please forward the original signed errata sheet to this office so that copies may be distributed to all parties.

Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

DATE: \_\_\_\_\_ SIGNATURE OF DEPONENT: \_\_\_\_\_

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THE STATE OF FLORIDA, )  
 COUNTY OF PALM BEACH. )

I, the undersigned authority, certify that [REDACTED] personally appeared before me on the 20th of February, 2008 and was duly sworn.

WITNESS my hand and official seal this 25 day of February, 2008.

*Judith F. Consor*

Judith F. Consor, FPR

Notary Public - State of Florida

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## CERTIFICATE

The State Of Florida, )  
 County Of Palm Beach. )

I, Judith F. Consor, Court Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did stenographically report the deposition of [REDACTED] that a review of the transcript was requested; and that the foregoing pages, numbered from 1 to 131, inclusive, are a true and correct transcription of my stenographic notes of said deposition.

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

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

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

DATED this 25 day of February, 2008

*Judith F. Consor*  
 Judith F. Consor, Court Reporter  
 Florida Professional Reporter

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