

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

-vs-

VOLUME III OF III

JEFFREY EPSTEIN,

Defendant.

Related cases:

08-80232, 08-08380, 08-80381, 08-80994
08-80993, 08-80811, 08-80893, 09-80469
09-80591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF

[REDACTED]

Wednesday, March 24, 2010
10:37 - 6:51 p.m.

250 Australian Avenue South
Suite 1500
West Palm Beach, Florida 33401

Reported By:
Rachel W. Bridge, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting Services
Job No.: 1484

[REDACTED] PROSE COURT REPORTING AGENCY, INC. [REDACTED]

Electronically signed by Rachel Bridge ([REDACTED])

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3501.125-027

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EFTA_00065413

EFTA01246559

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 502008CA028058XXXXMB AD

■.,

Plaintiff,

-vs-

VOLUME III OF III

JEFFREY EPSTEIN,

Defendant.

_____ /

VIDEOTAPED DEPOSITION OF

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EFTA_00065414

EFTA01246560

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 502008CA028051XXXXMB AB

■.,

Plaintiff,

-vs-

VOLUME III OF III

JEFFREY EPSTEIN,

Defendant.

_____/

VIDEOTAPED DEPOSITION OF

■

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EFTA_00065415

EFTA01246561

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE No.502008CA037319XXXXMB AB

██████.

Plaintiff,

-vs-

VOLUME III OF III

JEFFREY EPSTEIN
AND ████████,

Defendants.

VIDEOTAPED DEPOSITION OF

██████████

Wednesday, March 24, 2010
10:37 - 6:51 p.m.

250 Australian Avenue South
Suite 1500
West Palm Beach, Florida 33401

Reported By:
Rachel W. Bridge, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting Services
Job No.: 1484

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EFTA01246562

1 APPEARANCES:
 2 On behalf of the Plaintiff, [REDACTED]:
 3 SPENCER T. KUVIN, ESQUIRE
 4 LEOPOLD KUVIN
 5 2925 PGA Boulevard
 6 Suite 200
 7 Palm Beach Gardens, Florida 33410
 8 Phone: 561.515.1400
 9
 10 On behalf of the Plaintiffs, [REDACTED], [REDACTED], and
 11 Jane Doe:
 12 MATTHEW WEISSING, ESQUIRE
 13 FARMER, JAFFE, WEISSING, EDWARDS
 14 FISTOS & LEHRMAN, P.L.
 15 425 North Andrews Avenue
 16 Suite 2
 17 Fort Lauderdale, Florida 33301
 18 Phone: [REDACTED]
 19 On behalf of Jane Does 1 through 8:
 20 ADAM D. HOROWITZ, ESQUIRE
 21 MERMELSTEIN & HOROWITZ, P.A.
 22 18205 Biscayne Boulevard
 23 Suite 2218
 24 Miami, Florida 33160
 25 Phone: [REDACTED]
 On behalf of the Plaintiffs, 101, 102 and 103:
 KATHERINE W. EZELL, ESQUIRE
 AMY JOSEFSBERG EDERL, ESQUIRE
 PODHURST ORSECK
 25 West Flagler Street
 Suite 800
 Miami, Florida 33130
 Phone: [REDACTED]
 (Via telephone)

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1 Appearances continued...
 2 On behalf of the Plaintiff, Jane Doe II:
 3 ISIDRO MANUEL GARCIA, ESQUIRE
 4 GARCIA, ELKINS & BOEHRINGER
 5 224 Datura Avenue, Suite 900
 6 West Palm Beach, Florida 33401
 7 Phone: [REDACTED]
 8
 9 On behalf of the Defendant:
 10 JACK ALAN GOLDBERGER, ESQUIRE
 11 ATTERBURY, GOLDBERGER & WEISS, P.A.
 12 250 Australian Avenue South
 13 Suite 1400
 14 West Palm Beach, Florida 33401-5012
 15 Phone: [REDACTED]
 16
 17 On behalf of the Witness:
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]
 ALSO PRESENT:
 Jessica Cadwell, Paralegal
 Burman, Critton, Luttier & Coleman, P.A.
 Joseph Kozak, Videographer
 Prose Court Reporting Services

1 PROCEEDINGS
 2 ---
 3 THE VIDEOGRAPHER: We are now on the record.
 4 It is 5:42 p.m., and I'm on media number three.
 5 MR. [REDACTED]: If I could just put something
 6 quickly on the record before we start.
 7 I know Mr. Garcia said he had a couple of
 8 additional questions, which I have no objection to
 9 him asking, but it is 5:42 and we've been going
 10 almost seven hours with Ms. Kellen.
 11 And I know Ms. Ezell has questions and she has
 12 got her one client she has to ask questions about.
 13 I understand that, but I hope we can focus on going
 14 forward to areas that have not already been covered
 15 so we can actually get out of here tonight, because
 16 at some point we really do have to go, and I would
 17 like to get this over with today.
 18 So with that, Mr. Garcia, if you have some
 19 additional questions, I have no objection to you
 20 asking that.
 21 MR. GARCIA: Thank you.
 22 CROSS - continued ([REDACTED])
 23 BY MR. GARCIA:
 24 Q. Have you ever had a different hair color?
 25 MR. [REDACTED]: Asking if at any time in her

5 (Pages 381 to 384)

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EFTA01246563

1 life she's ever dyed her hair a different hair
2 color?
3 MR. GARCIA: Yes, or if she's dyed her hair
4 now or if that's her natural color. Let's start
5 with that.
6 BY MR. GARCIA:
7 Q. Is that your natural color?
8 MR. [REDACTED]: Answer that.
9 THE WITNESS: Yes.
10 BY MR. GARCIA:
11 Q. What is your natural color, so the transcript
12 will reflect it?
13 MR. [REDACTED]: We have a video, so I think
14 it's pretty clear.
15 THE WITNESS: Brown.
16 BY MR. GARCIA:
17 Q. Have you ever dyed your hair or colored your
18 hair blonde or any type of shade of light, lighter
19 shade?
20 MR. [REDACTED]: You mean at any time in her
21 life has she done that?
22 MR. GARCIA: Yes, sir.
23 THE WITNESS: Yes.
24 BY MR. GARCIA:
25 Q. For what period of time?

1 A. I don't recall.
2 Q. And how long have you gone back to your
3 natural color brown?
4 A. It's been a long time. I don't recall exactly
5 the dates.
6 Q. Do know somebody named Craig Greczyn, G-r-e-c-
7 as in cat, z as in Zorro, y-n?
8 A. No.
9 Q. He's a student at SUNY University, S-U-N-Y, in
10 Courtland.
11 A. No idea.
12 Q. Do you know Kofi Sansculotte, K-o-f-i,
13 S-a-n-s-c-u-l-o-t-t-e?
14 A. No.
15 Q. And Michael Daley?
16 A. No.
17 Q. I tried to see if I could Google your Facebook
18 page, and you thought you took it down after about ten
19 minutes. I did come up with three or four Sarah
20 Kellens. I'm not sure if it's the same one that you
21 are, but are you sure that you've taken it down?
22 A. Yes.
23 Q. And do you have any idea when you took it
24 down?
25 A. Maybe a year ago.

1 Q. And you are sure that you only had it up for
2 about ten minutes?
3 MR. [REDACTED]: Did you mean literally ten
4 minutes or just for a brief period of time?
5 THE WITNESS: A very brief period of time.
6 MR. [REDACTED]: You can answer Mr. Garcia's
7 question.
8 BY MR. GARCIA:
9 Q. Can you be more specific? Are we talking
10 about ten minutes for a day or ten minutes in a week or
11 a month?
12 A. Maybe a day. Maybe two days.
13 Q. Okay.
14 MR. GARCIA: Okay, that's all I have. Thanks.
15 CROSS ([REDACTED])
16 BY MS. EZELL:
17 Q. Ms. Kellen, my name is Katherine Ezell. I'm
18 here with Amy Josefsberg Ederi. We represent Jane Doe
19 103. We also represent three clients who have not yet
20 filed. Some of the questions may be repetitive, but I
21 believe we have the right to ask them with regard to our
22 clients. So with that said, we'll move along as fast as
23 we can.
24 Why did you take down your Facebook page?
25 A. I think it's a stupid site. I don't

1 understand it. I don't understand the point of it.
2 Q. Do you have e-mail?
3 A. Yes.
4 Q. And what is your e-mail address?
5 MR. [REDACTED]: Instruct the witness not to
6 answer based on Fifth Amendment privilege.
7 THE WITNESS: At the advice of counsel, I must
8 invoke my Fifth Amendment right.
9 BY MS. EZELL:
10 Q. Have you, have you done e-mail under the
11 address [REDACTED]?
12 A. Can you repeat that? I'm sorry.
13 Q. Have you used e-mail with the address
14 [REDACTED]?
15 A. No.
16 Q. Have you used e-mail with the address
17 [REDACTED]?
18 MR. [REDACTED]: Hold on a second. I'm going to
19 instruct the witness not to answer any questions
20 about any e-mail addresses that she may or may not
21 have had in the past based on her Fifth Amendment
22 privilege.
23 THE WITNESS: At the advice of my counsel, I
24 must invoke my Fifth Amendment right.
25

1 BY MS. EZELL:
 2 Q. With regard to the Facebook page again, why
 3 did you start it up if you thought it was a stupid site
 4 and didn't know how to use it?
 5 A. I was just curious.
 6 Q. Did anyone help you do that?
 7 A. No.
 8 Q. Did anyone tell you to take it down?
 9 A. No.
 10 Q. You were asked about any licenses. Have you
 11 never held a real estate license?
 12 A. Never.
 13 Q. Do you hold any licenses in any states other
 14 than Florida?
 15 MR. [REDACTED]: When you say licenses, you mean
 16 professional as opposed to a driver's license or
 17 some other sort of a license?
 18 MS. EZELL: Yes.
 19 THE WITNESS: I don't have a license anywhere
 20 for anything.
 21 BY MS. EZELL:
 22 Q. Do you have a driver's license?
 23 A. Yes.
 24 Q. And in what state?
 25 MR. [REDACTED]: I instruct her not to answer

1 based on her Fifth Amendment privilege.
 2 THE WITNESS: At the advice of counsel, I must
 3 invoke my Fifth Amendment privilege.
 4 MR. [REDACTED]: You can roll your eyes all you
 5 want, Mr. Horowitz. It's my client's right.
 6 She'll invoke it if she needs to.
 7 MR. HOROWITZ: I was shaking my head, not
 8 rolling my eyes. The Fifth Amendment assertion as
 9 to whether a person has a driver's license is
 10 ridiculous. It is ridiculous.
 11 MR. [REDACTED]: You can have that opinion, and
 12 if you want to bring that up to the judge, I'll be
 13 happy to explain to the judge why it's a valid
 14 invocation. I disagree with you.
 15 MS. EZELL: It is certainly a record that the
 16 government has and can be accessed.
 17 MR. [REDACTED]: That's true.
 18 (The document was marked Exhibit 16 for
 19 identification.)
 20 BY MS. EZELL:
 21 Q. I'm going to show you in a moment what I have
 22 premarked as Exhibit 16.
 23 MS. EZELL: Actually, it's Composite 16. It's
 24 three pages. I'll show it before I give it to the
 25 witness.

1 THE VIDEOGRAPHER: Okay.
 2 MS. EZELL: This is the second page.
 3 THE VIDEOGRAPHER: Okay.
 4 MS. EZELL: And here's the third page.
 5 THE VIDEOGRAPHER: Okay.
 6 MS. EZELL: And just for identification
 7 purposes, those are Bates stamped SAO 496
 8 through -- I'm sorry, 495 through 497. If you
 9 would pass that down, please, to the witness.
 10 BY MS. EZELL:
 11 Q. Do you recognize this. Sorry?
 12 MR. [REDACTED]: Are you asking about all three
 13 pages simultaneously or one page at a time?
 14 MS. EZELL: All three simultaneous.
 15 MR. [REDACTED]: Okay.
 16 BY MS. EZELL:
 17 Q. This appears to be, the first page appears to
 18 indicate that this was obtained from the driver's
 19 license authority in [REDACTED].
 20 MR. [REDACTED]: The first page we have looks
 21 like it's a printed page.
 22 MS. EZELL: Right.
 23 MR. [REDACTED]: From -- oh, I see. Okay, never
 24 mind.
 25

1 BY MS. EZELL:
 2 Q. It's from the supervising driver license clerk
 3 in the city and county of [REDACTED]. Do you see that?
 4 A. Yes.
 5 Q. Do you recognize that application, pages two
 6 and three?
 7 MR. [REDACTED]: Page two is a printout of what
 8 appears to be a driver's license. Page three
 9 appears to be a fingerprint.
 10 Is that what you are asking her, if she
 11 recognizes this?
 12 MS. EZELL: Yes, uh huh.
 13 MR. [REDACTED]: I instruct her not to answer
 14 those questions.
 15 THE WITNESS: At the instruction of my lawyer,
 16 I must invoke my Fifth Amendment right.
 17 BY MS. EZELL:
 18 Q. Even though this is a public record?
 19 MR. [REDACTED]: Well, if it's a public record
 20 or not, she doesn't have to admit or authenticate
 21 it for you. You can prove it some other way. She
 22 has a Constitutional right not to admit or
 23 authenticate the document for you, and that's what
 24 she is invoking.
 25

1 BY MS. EZELL:
 2 Q. Did you ever hold a [REDACTED] driver's license?
 3 MR. [REDACTED]: Same instruction. It's been
 4 asked and answered.
 5 THE WITNESS: At the instruction of my lawyer,
 6 I must invoke my Fifth Amendment right.
 7 BY MS. EZELL:
 8 Q. Do you currently hold a [REDACTED] driver's
 9 license?
 10 MR. [REDACTED]: It's been asked and answered,
 11 same instruction.
 12 THE WITNESS: At the instruction of my lawyer,
 13 I must invoke my Fifth Amendment right.
 14 BY MS. EZELL:
 15 Q. Is that not your picture on the second page of
 16 that exhibit?
 17 MR. [REDACTED]: Same instruction.
 18 THE WITNESS: At the instruction of my lawyer,
 19 I must invoke my Fifth Amendment right.
 20 BY MS. EZELL:
 21 Q. Do you see the name [REDACTED]?
 22 MR. [REDACTED]: She's just asking if you see
 23 that on the document.
 24 THE WITNESS: Yes.
 25

1 BY MS. EZELL:
 2 Q. And haven't you testified today that that is
 3 your name?
 4 MR. [REDACTED]: The testimony will speak for
 5 itself. Next question.
 6 BY MS. EZELL:
 7 Q. You may answer.
 8 MR. [REDACTED]: Next question.
 9 MS. EZELL: You are instructing her not to
 10 answer that question?
 11 MR. [REDACTED]: I am.
 12 BY MS. EZELL:
 13 Q. What was your address at the time that that,
 14 that you applied for a license then?
 15 MR. [REDACTED]: Object to the form, assumes
 16 facts that she has not acknowledged, that she ever
 17 applied for this license, and I'll instruct her not
 18 to answer.
 19 BY MS. EZELL:
 20 Q. Is the post office box --
 21 MR. [REDACTED]: Hold on, let her answer or not
 22 answer.
 23 THE WITNESS: At the instruction of my lawyer,
 24 I must invoke my Fifth Amendment right.
 25

1 BY MS. EZELL:
 2 Q. Did you at one time hold a [REDACTED]
 3 in -- I won't pronounce it right, but [REDACTED]?
 4 THE REPORTER: Could you spell --
 5 MS. EZELL: It's [REDACTED], I believe.
 6 MR. [REDACTED]: I instruct the witness not to
 7 answer based on her Fifth Amendment privilege.
 8 THE WITNESS: At the instruction of my lawyer,
 9 I must invoke my Fifth Amendment right.
 10 BY MS. EZELL:
 11 Q. Were you born on [REDACTED]?
 12 MR. [REDACTED]: Same instruction.
 13 THE WITNESS: At the instruction of my lawyer,
 14 I must invoke my Fifth Amendment right.
 15 BY MS. EZELL:
 16 Q. Do you see a signature there for [REDACTED]?
 17 MR. [REDACTED]: Just asking if she sees a
 18 signature on the paper --
 19 MS. EZELL: That says [REDACTED].
 20 THE WITNESS: I see it.
 21 BY MS. EZELL:
 22 Q. Is that your signature?
 23 MR. [REDACTED]: Instruct the witness not to
 24 answer based on her Fifth Amendment privilege.
 25 THE WITNESS: At the instruction of my lawyer,

1 I must invoke my Fifth Amendment right.
 2 BY MS. EZELL:
 3 Q. Do you drive an automobile in Palm Beach
 4 County?
 5 MR. [REDACTED]: Let me understand the question.
 6 Are you asking if she ever drives a vehicle in the
 7 county or if she drives a vehicle registered in the
 8 county?
 9 MS. EZELL: If she drives a vehicle in Palm
 10 Beach County.
 11 MR. [REDACTED]: You can answer that. In other
 12 words, did you drive a car here today?
 13 THE WITNESS: Yes.
 14 BY MS. EZELL:
 15 Q. You were asked earlier if you have ever been
 16 to Palm Beach as opposed to West Palm Beach where we are
 17 today, and I believe you answered yes.
 18 A. Uh huh.
 19 Q. Where have you been in Palm Beach?
 20 MR. [REDACTED]: I instruct her not to answer
 21 based on her Fifth Amendment privilege.
 22 THE WITNESS: At the instruction of my lawyer,
 23 I must invoke my Fifth Amendment right.
 24 BY MS. EZELL:
 25 Q. When was the last time you were on Palm Beach

1 island, if it's an island?

2 MR. [REDACTED]: Objection, it's been asked
3 before, and I'll instruct her not to answer for the
4 same reason.

5 THE WITNESS: At the instruction of my lawyer,
6 I must invoke my Fifth Amendment right.

7 BY MS. EZELL:

8 Q. Have you ever heard of Jeffrey Epstein?

9 MR. [REDACTED]: Objection, instruct the witness
10 not to answer based on her Fifth Amendment
11 privilege.

12 THE WITNESS: At the instruction of my lawyer,
13 I must invoke my Fifth Amendment right.

14 MR. [REDACTED]: It's also been asked and
15 answered.

16 BY MS. EZELL:

17 Q. Do you read the newspapers?

18 A. Not really.

19 Q. Have you read any newspapers in the last four
20 years in Palm Beach County?

21 A. I'm sure I have.

22 Q. Have you read the Palm Beach Post?

23 A. No, I don't.

24 Q. What newspapers do you read?

25 A. New York Times, New York Post. That's about

1 it, on occasion.

2 Q. And have you ever -- do you watch the news on
3 TV, local news?

4 A. No.

5 Q. When you did your Facebook page, whose
6 computer did you use?

7 A. My own.

8 Q. What kind of computer do you own?

9 A. An Apple computer.

10 Q. Is it a laptop?

11 A. Yes.

12 Q. How long have you had that computer?

13 A. I don't recall.

14 Q. Do you know Eva Andersson?

15 MR. [REDACTED]: Objection, it's been asked and
16 answered.

17 MS. EZELL: I think it was asked whether or
18 not she had been on a plane with her.

19 MR. [REDACTED]: I believe she was asked if she
20 knew who Eva Andersson was, but she can go ahead
21 and respond to the question. I instruct her not to
22 answer.

23 THE WITNESS: At the instruction of my lawyer,
24 I must invoke my Fifth Amendment right.

1 BY MS. EZELL:

2 Q. Do you know Glenn Dubin?

3 MR. [REDACTED]: It's also asked and answered,
4 but I'll let her answer it again.

5 THE WITNESS: At the instruction of my lawyer,
6 I must invoke my Fifth Amendment right.

7 BY MS. EZELL:

8 Q. [REDACTED]?

9 MR. [REDACTED]: Same instruction, objection to
10 the form, assumes facts that she has not
11 acknowledged, so there is no foundation for the
12 question.

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

15 BY MS. EZELL:

16 Q. [REDACTED]
17 [REDACTED]?

18 MR. [REDACTED]: [REDACTED]

19 MS. EZELL: [REDACTED]

20 MR. [REDACTED]: Objection to form. Once again,
21 assumes facts that she has not acknowledged, that
22 there is no foundation. Instruct her not to answer
23 the question.

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

1 BY MS. EZELL:

2 Q. Are you an only child?

3 MR. [REDACTED]: It's been asked and answered or
4 responded to, and I'll instruct her once again to
5 respond.

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

8 BY MS. EZELL:

9 Q. I believe you stated that you had changed your
10 hair color at some point in your life.

11 Have you changed it in the last five years?

12 A. I don't recall exact years and dates.

13 Q. I'm sorry?

14 A. I don't recall exact years and dates that I
15 have.

16 Q. Have you been a blonde at some point in the
17 last, in the last eight years?

18 A. Most likely.

19 Q. At more than one time? In other words, have
20 you gone back and forth between being a brunette and a
21 blonde or were you a blonde for a certain period of
22 time?

23 A. I think I went back and forth at one point.

24 Q. Have you ever either had an office or worked
25 at an office in this building, which is One Clearlake

1 Centre?
 2 MR. [REDACTED]: Instruct the witness not to
 3 answer based on her Fifth Amendment privilege.
 4 THE WITNESS: At the advice of counsel, I must
 5 invoke my Fifth Amendment right.
 6 BY MS. EZELL:
 7 Q. Have you ever gone to that office on a daily
 8 basis with Jeffrey Epstein?
 9 MR. [REDACTED]: Objection to form. There is no
 10 foundation, because she hasn't acknowledged going
 11 to an office in this building.
 12 Also objection as to the implied knowledge of
 13 Mr. Epstein. Instruct her not to answer.
 14 THE WITNESS: At the instruction of my lawyer,
 15 I must invoke my Fifth Amendment right.
 16 BY MS. EZELL:
 17 Q. Have you ever had anything to do with a
 18 company called the Florida Science Foundation?
 19 MR. [REDACTED]: Instruct the witness not to
 20 answer based on Fifth Amendment.
 21 THE WITNESS: At the instruction of my lawyer,
 22 I must invoke my Fifth Amendment right.
 23 BY MS. EZELL:
 24 Q. Your middle name is [REDACTED]; is that correct?
 25 A. Correct.

1 Q. [REDACTED]?
 2 MR. [REDACTED]: It's been asked and answered
 3 twice. You can answer it again.
 4 THE WITNESS: [REDACTED].
 5 BY MS. EZELL:
 6 Q. Thank you.
 7 Where do you, of what state are you a
 8 resident?
 9 MR. [REDACTED]: Instruct the witness not to
 10 answer based on Fifth Amendment.
 11 THE WITNESS: At the instruction of my lawyer,
 12 I must invoke my Fifth Amendment right.
 13 BY MS. EZELL:
 14 Q. Where do you vote?
 15 MR. [REDACTED]: Same instruction.
 16 THE WITNESS: At the instruction of my lawyer,
 17 I must invoke my Fifth Amendment right.
 18 BY MS. EZELL:
 19 Q. Are you registered to vote?
 20 MR. [REDACTED]: It's been asked and answered.
 21 I'll instruct her not to answer again, or to answer
 22 it, to respond to it, I should say.
 23 THE WITNESS: At the instruction of my lawyer,
 24 I must invoke my Fifth Amendment right.
 25

1 BY MS. EZELL:
 2 Q. Do you consider yourself a citizen of the
 3 United States?
 4 MR. [REDACTED]: You can answer that.
 5 THE WITNESS: Yes.
 6 BY MS. EZELL:
 7 Q. And of what state do you consider yourself to
 8 be a citizen?
 9 MR. [REDACTED]: That was just asked and
 10 answered.
 11 MS. EZELL: I asked about residency.
 12 MR. [REDACTED]: I apologize.
 13 THE WITNESS: What's the difference?
 14 MR. [REDACTED]: Instruct the witness not to
 15 answer the question based on Fifth Amendment.
 16 THE WITNESS: At the instruction of my lawyer,
 17 I must invoke my Fifth Amendment right.
 18 BY MS. EZELL:
 19 Q. Have you changed your residency in the last
 20 three years?
 21 MR. [REDACTED]: Residency for which? I just
 22 want to be clear, Ms. Ezell. You mean legal
 23 residency or where she actually lives residency?
 24 MS. EZELL: Well, let's do both.
 25

1 BY MS. EZELL:
 2 Q. Have you changed your legal residency in the
 3 last five years?
 4 A. I don't think so.
 5 Q. Have you changed the place you live in the
 6 last five years?
 7 MR. [REDACTED]: Instruct her not to answer that
 8 question based on Fifth Amendment.
 9 THE WITNESS: At the advice of counsel, I must
 10 invoke my Fifth Amendment right.
 11 BY MS. EZELL:
 12 Q. Have you changed your citizenship, your state
 13 citizenship in the last five years?
 14 MR. [REDACTED]: Again, for purposes of voting
 15 and other things or just --
 16 MS. EZELL: Yes, whatever things citizenship
 17 entitles one to do.
 18 MR. [REDACTED]: If you understand the question,
 19 you can answer it.
 20 THE WITNESS: I don't recall really ever
 21 changing -- I didn't know that you could change
 22 your citizenship of a state.
 23 BY MS. EZELL:
 24 Q. Well, if you move from one state to another,
 25 you might change your voter's registration. Have you

1 done that?
 2 MR. [REDACTED]: You can answer.
 3 THE WITNESS: No.
 4 BY MS. EZELL:
 5 Q. Are you a resident of or citizen of the US
 6 Virgin Islands currently?
 7 MR. [REDACTED]: Do you understand? You can
 8 answer it.
 9 THE WITNESS: No.
 10 BY MS. EZELL:
 11 Q. Do you pay taxes in any state?
 12 MR. [REDACTED]: Answer that yes or no.
 13 THE WITNESS: Yes.
 14 BY MS. EZELL:
 15 Q. In what states do you pay taxes?
 16 MR. [REDACTED]: Instruct her not to answer that
 17 question based on Fifth Amendment.
 18 THE WITNESS: At the instruction of my lawyer,
 19 I must invoke my Fifth Amendment right.
 20 BY MS. EZELL:
 21 Q. Do you own property in any state?
 22 MR. [REDACTED]: It's a yes or no question. You
 23 can answer that.
 24 THE WITNESS: No.
 25

1 BY MS. EZELL:
 2 Q. Is that a no?
 3 A. No.
 4 Q. Have you owned property in any state in the
 5 last five years?
 6 A. No.
 7 Q. Are you taking any prescribed medication at
 8 this time?
 9 MR. [REDACTED]: You can answer the question.
 10 THE WITNESS: [REDACTED]
 11 BY MS. EZELL:
 12 Q. I'm sorry?
 13 A. [REDACTED]
 14 Q. Anything else?
 15 A. No.
 16 Q. You didn't take anything before this
 17 deposition today?
 18 A. No.
 19 Q. [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 Q. And for what company or organization did you
 23 model at 18?
 24 MR. [REDACTED]: Instruct her not to answer the
 25 question based on her Fifth Amendment privilege.

1 THE WITNESS: At the advice of my lawyer, I
 2 must invoke my Fifth Amendment right.
 3 BY MS. EZELL:
 4 Q. [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 Q. Have you ever been involved in modeling for MC
 9 Squared?
 10 MR. [REDACTED]: Instruct the witness --
 11 objection to the form, assumes knowledge of an
 12 entity by the name of MC Squared which the witness
 13 has not acknowledged or have any knowledge of, so
 14 there is no foundation for the question.
 15 I'd instruct her not to answer based on her
 16 Fifth Amendment privilege.
 17 THE WITNESS: At the instruction of my lawyer,
 18 I must invoke my Fifth Amendment right.
 19 BY MS. EZELL:
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 BY MS. EZELL:
 5 Q. And what happened to those, where are those
 6 pictures?
 7 A. I have them.
 8 Q. And who is your boyfriend?
 9 MR. [REDACTED]: Hold on a second.
 10 Instruct the witness not to answer based on
 11 her Fifth Amendment privilege.
 12 BY MS. EZELL:
 13 Q. Is that your current boyfriend who took the
 14 pictures?
 15 MR. [REDACTED]: You can answer that.
 16 THE WITNESS: No.
 17 BY MS. EZELL:
 18 Q. [REDACTED]
 19 [REDACTED]
 20 MR. [REDACTED]: At this point this is getting
 21 into her privacy rights beyond the scope of
 22 anything I think that's relevant to this case. I'm
 23 going to ask you to move on.
 24 MS. EZELL: Are you instructing her not to
 25 answer?

1 MR. [REDACTED]: I am. I am.
 2 BY MS. EZELL:
 3 Q. Do you have all copies of those pictures or
 4 have they been distributed?
 5 A. I hope I have all copies.
 6 Q. Would you please -- I have a little difficulty
 7 hearing you.
 8 A. Sorry.
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 Q. Who introduced you to Jeffrey Epstein?
 25 MR. [REDACTED]: Instruct the witness not to

1 answer based on her Fifth Amendment privilege.
 2 THE WITNESS: At the instruction of my lawyer,
 3 I must invoke my Fifth Amendment right.
 4 BY MS. EZELL:
 5 Q. Have you ever been to a social event in New
 6 York that is restricted to billionaires?
 7 A. Sorry, can you repeat that?
 8 Q. Yes. Have you ever been to a social event
 9 that's held annually in New York restricted to
 10 billionaires?
 11 A. I've never heard of such an event, no.
 12 Q. Have you ever been to such an organization in
 13 California?
 14 A. No. I, I have never heard of such an event
 15 like that, so I don't know.
 16 Q. Have you never seen your picture taken and
 17 displayed in print media at such an event?
 18 MR. [REDACTED]: Objection to the form. It's
 19 not established she has any idea what event or what
 20 kind of event this would be.
 21 BY MS. EZELL:
 22 Q. An annual event involving millionaires --
 23 billionaires, excuse me.
 24 MR. [REDACTED]: Objection to the form. There
 25 is a lack of foundation for the question.

1 THE WITNESS: I don't -- I don't get it. It's
 2 vague. I don't understand the question.
 3 BY MS. EZELL:
 4 Q. Are you not aware of an organization that
 5 limits its membership to billionaires?
 6 A. No, I'm not.
 7 [REDACTED]
 8 [REDACTED]
 9 MR. [REDACTED]: Instruct the witness not to
 10 answer based on her Fifth Amendment privilege, and
 11 that's also been asked and answered several times.
 12 THE WITNESS: At the instruction of my lawyer,
 13 I must invoke my Fifth Amendment right.
 14 BY MS. EZELL:
 15 Q. By whom are you currently employed?
 16 MR. [REDACTED]: Objection, also been asked and
 17 answered several times. Instruct her not to
 18 answer.
 19 THE WITNESS: At the instruction of my lawyer,
 20 I must invoke my Fifth Amendment right.
 21 BY MS. EZELL:
 22 Q. Are you employed by an individual or by a
 23 corporation?
 24 MR. [REDACTED]: Same instruction.
 25 THE WITNESS: At the instruction of my lawyer,

1 I must invoke my Fifth Amendment right.
 2 BY MS. EZELL:
 3 Q. Do you receive a W2?
 4 MR. [REDACTED]: Same instruction.
 5 THE WITNESS: At the instruction of my lawyer,
 6 I must invoke my Fifth Amendment right.
 7 BY MS. EZELL:
 8 Q. Do you receive a 1099?
 9 MR. [REDACTED]: Same instruction.
 10 THE WITNESS: At the instruction of my lawyer,
 11 I must invoke my Fifth Amendment right.
 12 BY MS. EZELL:
 13 Q. Does anyone claim you as a dependent on their
 14 tax returns?
 15 MR. [REDACTED]: Anyone other than herself?
 16 MS. EZELL: Yes.
 17 THE WITNESS: No.
 18 BY MS. EZELL:
 19 Q. Have you ever signed a confidentiality
 20 agreement?
 21 MR. [REDACTED]: With anyone?
 22 MS. EZELL: Yes.
 23 MR. HOROWITZ: Instruct the witness not to
 24 answer based on her Fifth Amendment privilege.
 25 THE WITNESS: At the instruction of my lawyer,

1 I must invoke my Fifth Amendment right.
 2 BY MS. EZELL:
 3 [REDACTED]
 4 [REDACTED]
 5 A. Have I what? I'm sorry.
 6 [REDACTED]
 7 [REDACTED]
 8 A. I don't recall ever saying those words.
 9 Q. Is it true that you will do anything Jeffrey
 10 Epstein asks?
 11 MR. [REDACTED]: Objection to the form, compound
 12 question. Assumes knowledge of Jeffrey Epstein, so
 13 I instruct the witness not to answer.
 14 THE WITNESS: At the instruction of my lawyer,
 15 I must invoke my Fifth Amendment privilege.
 16 BY MS. EZELL:
 17 Q. In 2005 and '6, did you have a designated
 18 computer in Mr. Epstein's home on El Brillo Way?
 19 MR. [REDACTED]: Objection to form, it's
 20 compound and assumes knowledge of Mr. Epstein and
 21 of a location on El Brillo Way, so I instruct the
 22 witness not to answer.
 23 THE WITNESS: At the instruction of my lawyer,
 24 I must invoke my Fifth Amendment right.
 25

1 BY MS. EZELL:
 2 Q. Did you have on a computer at El Brillo Way a
 3 list of contact information and pictures of numerous
 4 [REDACTED] women?
 5 MR. [REDACTED]: Objection to the form, it's
 6 compound and it is lack of foundation based on the
 7 prior question and answer.
 8 Instruct the witness not to answer.
 9 THE WITNESS: At the instruction of my lawyer,
 10 I must invoke my Fifth Amendment right.
 11 BY MS. EZELL:
 12 Q. Did you and Ghislaine Maxwell share that
 13 information on both of your computers?
 14 MR. [REDACTED]: Objection to form, assumes
 15 knowledge of a person by the name of Ghislaine;
 16 Maxwell.
 17 Also lack of foundation based on the prior two
 18 answers. Instruct the witness not to answer.
 19 THE WITNESS: At the instruction of my lawyer,
 20 I must invoke my Fifth Amendment privilege.
 21 BY MS. EZELL:
 22 [REDACTED]
 23 [REDACTED]
 24 MR. [REDACTED]: Objection to form, lack of
 25 foundation, assumes knowledge of Mr. Epstein

1 implicitly. Instruct the witness not to answer.
 2 THE WITNESS: At the instruction of my lawyer,
 3 I must invoke my Fifth Amendment right.
 4 BY MS. EZELL:
 5 Q. Do you know Juan Alessi?
 6 THE WITNESS: At the instruction of my lawyer,
 7 I must invoke my Fifth Amendment right.
 8 BY MS. EZELL:
 9 Q. Do you know Alfredo Rodriguez?
 10 MR. [REDACTED]: It's been asked and answered.
 11 Go ahead and answer it again.
 12 THE WITNESS: At the instruction of my lawyer,
 13 I must invoke my Fifth Amendment right.
 14 BY MS. EZELL:
 15 Q. I think you also might have been asked if you
 16 know Janusz Banasiak.
 17 THE WITNESS: At the instruction of my lawyer,
 18 I must invoke my Fifth Amendment right.
 19 BY MS. EZELL:
 20 Q. Are you a photographer?
 21 MR. [REDACTED]: Objection to the form, it's
 22 ambiguous. Amateur photographer? Professional
 23 photographer? Can you clarify?
 24 BY MS. EZELL:
 25 Q. Do you enjoy photography?

1 A. Yes.
 2 Q. What kind of camera do you have?
 3 MR. [REDACTED]: Instruct the witness not to
 4 answer the question.
 5 THE WITNESS: At the instruction of my lawyer,
 6 I must invoke my Fifth Amendment right.
 7 BY MS. EZELL:
 8 Q. Do you know Maria Alessi?
 9 THE WITNESS: At the instruction of my lawyer,
 10 I must invoke my Fifth Amendment right.
 11 BY MS. EZELL:
 12 Q. Have you ever known Jeffrey Epstein to give
 13 cameras to young women who come to his home to give him
 14 massages?
 15 MR. [REDACTED]: Objection to the form, standing
 16 objection, lack of foundation as to Mr. Epstein and
 17 to his home. Instruct the witness not to answer.
 18 THE WITNESS: At the instruction of my lawyer,
 19 I must invoke my Fifth Amendment right.
 20 BY MS. EZELL:
 21 Q. Have you been encouraged in your pursuit of
 22 photography by Mr. Epstein?
 23 MR. [REDACTED]: Same objection previously
 24 stated.
 25 THE WITNESS: At the instruction of my lawyer,

1 I must invoke my Fifth Amendment right.
 2 BY MS. EZELL:
 3 Q. Have you ever taken pictures of any of the
 4 young women who have visited the Epstein mansion to
 5 provide massages?
 6 MR. [REDACTED]: Objection to form, compound,
 7 lack of foundation. Instruct the witness not to
 8 answer.
 9 THE WITNESS: At the instruction of my lawyer,
 10 I must invoke my Fifth Amendment right.
 11 BY MS. EZELL:
 12 Q. Are you aware of any hidden cameras on the
 13 premises?
 14 MR. [REDACTED]: Which premises?
 15 MS. EZELL: At the El Brillo Way address of
 16 Mr. Epstein.
 17 MR. [REDACTED]: Objection to form, lack of
 18 foundation, compound. Instruct the witness not to
 19 answer.
 20 THE WITNESS: At the instruction of my lawyer,
 21 I must invoke my Fifth Amendment right.
 22 BY MS. EZELL:
 23 Q. Did you ever meet a young woman named [REDACTED]?
 24 A. At the instruction of my lawyer, I must invoke
 25 my Fifth Amendment right.

1 Q. Were you sometimes designated or requested by
 2 Mr. Epstein to buy gifts for the young women who would
 3 come to the home to give him massages?
 4 MR. [REDACTED]: Objection to form, lack of
 5 foundation. Instruct the witness not to answer.
 6 THE WITNESS: At the instruction of my lawyer,
 7 I must invoke my Fifth Amendment right.
 8 BY MS. EZELL:
 9 Q. Were you aware that Mr. Epstein gave [REDACTED] a
 10 digital camera and encouraged her in her pursuit of
 11 photography?
 12 MR. [REDACTED]: Same objection stated to the
 13 previous question and same instruction.
 14 THE WITNESS: At the instruction of my lawyer,
 15 I must invoke my Fifth Amendment right.
 16 BY MS. EZELL:
 17 Q. Have you ever met a young woman named [REDACTED]?
 18 A. At the instruction of my lawyer, I must invoke
 19 my Fifth Amendment right.
 20 Q. Were you ever aware that Mr. Epstein gave [REDACTED]
 21 a regular camera and encouraged her in her pursuit of
 22 photography?
 23 MR. [REDACTED]: Objection to form, assumes
 24 certain facts, lack of foundation, compound.
 25 Instruct the witness not to answer.

1 THE WITNESS: At the instruction of my lawyer,
 2 I must invoke my Fifth Amendment right.
 3 BY MS. EZELL:
 4 Q. Have you, have you ever photographed any of
 5 the young women who visited or visit the Epstein home to
 6 provide massages to Mr. Epstein?
 7 MR. [REDACTED]: Objection to form, it's been
 8 asked and answered.
 9 Also lack of foundation and standing
 10 objection. Same instruction.
 11 THE WITNESS: At the instruction of my lawyer,
 12 I must invoke my Fifth Amendment right.
 13 BY MS. EZELL:
 14 Q. Have you ever photographed any minor girls who
 15 are either partially nude or nude?
 16 MR. [REDACTED]: That's also been asked and
 17 answered. I instruct her once again not to answer
 18 the question.
 19 THE WITNESS: At the instruction of my lawyer,
 20 I must invoke my Fifth Amendment right.
 21 BY MS. EZELL:
 22 Q. Have you ever been aware of something called
 23 the Edge Group?
 24 MR. [REDACTED]: Consult.
 25 THE WITNESS: At the advice of my lawyer, I

1 must invoke the Fifth Amendment right.
 2 BY MS. EZELL:
 3 Q. Is that the name of a group that's, whose
 4 membership is made up of billionaires?
 5 MR. [REDACTED]: Objection to form, lack of
 6 foundation. Instruct the witness not to answer.
 7 THE WITNESS: At the instruction of my lawyer,
 8 I must invoke my Fifth Amendment right.
 9 BY MS. EZELL:
 10 Q. Did you attend a function of the Edge Group in
 11 February of 1902 -- I'm sorry, 2002?
 12 MR. [REDACTED]: Object to form, there is a lack
 13 of foundation. Instruct the witness not to answer.
 14 THE WITNESS: At the instruction of my lawyer,
 15 I must invoke my Fifth Amendment right.
 16 BY MS. EZELL:
 17 Q. Have you attended several functions since 2002
 18 of the Edge Group?
 19 MR. [REDACTED]: Objection to the form, because
 20 there is no foundation for her having any knowledge
 21 of an entity called the Edge Group, so I'll
 22 instruct her not to answer.
 23 THE WITNESS: At the instruction of my lawyer,
 24 I must invoke my Fifth Amendment right.
 25

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1 BY MS. EZELL:

2 Q. Are you a member of the Edge Group or do you
3 go as the guest of Mr. Epstein?

4 MR. [REDACTED]: Again, there is no foundation
5 for the question because there is no, there is no
6 connection of her to this organization, and I'd
7 instruct her not to answer. Form objection.

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

10 BY MS. EZELL:

11 Q. Do you know Ghislaine Maxwell's e-mail
12 address?

13 MR. [REDACTED]: Instruct the witness not to
14 answer, objection to form, lack of foundation as to
15 her knowledge of anyone named Ghislaine Maxwell.

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

18 BY MS. EZELL:

19 Q. Do you know a [REDACTED] or [REDACTED],
20 [REDACTED]?

21 A. At the instruction of my lawyer, I must invoke
22 my Fifth Amendment right.

23 Q. Did you participate in a sort of routine
24 involving young women who would come to the house,
25 Mr. Epstein's house on El Brillo Way to provide

1 is a lack of foundation of her having any
2 interaction with anyone at any home owned by
3 Mr. Epstein, whoever he may be. Instruct her not
4 to answer.

5 THE WITNESS: At the instruction of my lawyer,
6 I must invoke my Fifth Amendment right.

7 BY MS. EZELL:

8 Q. Were you the one who routinely would get out
9 the lotion, towels, and massage equipment once you
10 arrived at the massage room with the girl?

11 MR. [REDACTED]: Same objection to the form,
12 same objection stated to the previous question.
13 It's been asked and answered as well.

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

16 BY MS. EZELL:

17 Q. Does Mr. Epstein particularly like any
18 particular massage oils?

19 MR. [REDACTED]: Objection to the form, standard
20 objection, no foundation as to her knowledge of
21 anything relating to Jeffrey Epstein. Instruct her
22 not to answer.

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

1 massages?

2 MR. [REDACTED]: That's been asked and answered
3 several times, object to the form, lack of
4 foundation as to any knowledge relating to Epstein
5 or El Brillo Way. Instruct her not to answer.

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

8 BY MS. EZELL:

9 Q. Was it routine practice for you to come and
10 meet the girl after she arrived at El Brillo Way to
11 provide a massage for the sexual gratification of
12 Mr. Epstein?

13 MR. [REDACTED]: Objection to form, it's
14 compound. There is a lack of foundation. Instruct
15 the witness not to answer. It's been asked and
16 answered several times.

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

19 BY MS. EZELL:

20 Q. Was it your practice to then lead the young
21 woman who had come to give Mr. Epstein a massage up a
22 stairway that is behind a door in the kitchen of the
23 home on El Brillo Way?

24 MR. [REDACTED]: Objection to the form, it's
25 compound, assuming many facts. It's not, and there

1 BY MS. EZELL:

2 Q. Was it your general practice to leave the girl
3 alone either just before or when Mr. Epstein would come
4 into the room?

5 MR. [REDACTED]: Objection to the form, again
6 assuming multiple facts and the same question, none
7 of which have any foundation. Instruct her not to
8 answer.

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

11 BY MS. EZELL:

12 Q. Who paid the girls who came to El Brillo Way
13 to provide massages and other sexual favors for
14 Mr. Epstein?

15 MR. [REDACTED]: Same objection as to form as
16 previously stated to the last three or four
17 questions. Same instruction to the witness.

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

20 BY MS. EZELL:

21 Q. Who was responsible for keeping the supply of
22 cash in the house from which the girls were paid?

23 MR. [REDACTED]: Same objection as to form and
24 lack of foundation. Instruct the witness not to
25 answer.

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1 THE WITNESS: At the instruction of my lawyer, 2 I must invoke my Fifth Amendment right. 3 BY MS. EZELL: 4 Q. Was it your practice or habit to get the 5 telephone numbers and contact information of each girl 6 before she left El Brillo Way? 7 MR. [REDACTED]: Same objection as to form as 8 stated to the last series of questions. Same 9 instruction. 10 THE WITNESS: At the instruction of my lawyer, 11 I must invoke my Fifth Amendment right. 12 BY MS. EZELL: 13 Q. Going back to that stairway that led from the 14 kitchen up to the massage room, was there a time when 15 there were photos of nude girls all the way up that 16 stairway? 17 MR. [REDACTED]: Same objection as to form and 18 lack of foundation as to any basis to question this 19 witness on anything having to do with a home owned 20 by Mr. Epstein or any staircase or any pictures on 21 a staircase. So instruct her not to answer. 22 THE WITNESS: At the instruction of my lawyer, 23 I must invoke my Fifth Amendment right. 24 BY MS. EZELL: 25 Q. Do you recall a time when all those	1 MR. [REDACTED]: Objection to the form, lack of 2 foundation. Instruct the witness not to answer. 3 THE WITNESS: At the instruction of my lawyer, 4 I must invoke my Fifth Amendment right. 5 BY MS. EZELL: 6 Q. Did you ever text with Jane No. 103 about her 7 coming to Mr. Epstein's house? 8 MR. [REDACTED]: Same instruction, same 9 objection. 10 THE WITNESS: At the instruction of my lawyer, 11 I must invoke my Fifth Amendment right. 12 BY MS. EZELL: 13 Q. Were you aware that Jeffrey Epstein was 14 helping Jane No. 103 with her college application? 15 MR. [REDACTED]: Objection to the form, lack of 16 foundation as to any knowledge as to Jeffrey 17 Epstein, so therefore it's compound and ambiguous. 18 Instruct you not to answer. 19 THE WITNESS: At the instruction of my lawyer, 20 I must invoke my Fifth Amendment right. 21 BY MS. EZELL: 22 Q. Did you ever hear Mr. Epstein tell Jane No. 23 103 that he would help her even with the financing of 24 her college, of her education? 25 MR. [REDACTED]: Same objection stated to the
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1 photographs were removed? 2 MR. [REDACTED]: Objection to the form, lack of 3 foundation, same objection as the previous series 4 of questions. Same instruction. 5 THE WITNESS: At the instruction of my lawyer, 6 I must invoke my Fifth Amendment right. 7 BY MS. EZELL: 8 Q. Did you ever text girls about coming to 9 provide massages for Jeffrey Epstein? 10 MR. [REDACTED]: Objection as to form, lack of 11 foundation as to any knowledge of Jeffrey Epstein. 12 Instruct her not to answer. 13 THE WITNESS: At the instruction of my lawyer, 14 I must invoke my Fifth Amendment right. 15 BY MS. EZELL: 16 Q. Do you know how to text? 17 A. Yes. 18 Q. And how long have you been texting? 19 A. Twelve years. 20 Q. Twelve years? That's great. You are way 21 ahead of me. I still don't know how. 22 Do you know a young woman named Jane No. 103? 23 A. At the advice of my counsel, I must invoke my 24 Fifth Amendment right. 25 Q. Did you ever drive Jane No. 103 anywhere?	1 previous question. Objection to form and lack of 2 foundation. Instruct the witness not to answer. 3 THE WITNESS: At the instruction of my lawyer, 4 I must invoke my Fifth Amendment right. 5 BY MS. EZELL: 6 Q. Do you recall -- and I believe it's in 7 Exhibit 4, if we could pull Exhibit 4, please. If I 8 could just look at it for a moment, please. 9 MR. [REDACTED]: Certainly. 10 MS. EZELL: Thanks. Oh, good, it's on the 11 front. 12 BY MS. EZELL: 13 Q. The first page of Exhibit 4, I'd ask you to 14 look at that. Do you recognize that handwriting? 15 MR. [REDACTED]: That was asked and answered 16 about six hours ago. She said no. 17 You can answer it again. 18 THE WITNESS: No. 19 BY MS. EZELL: 20 Q. Were you aware that Mr. Epstein ordered roses 21 to be delivered to Jane No. 103 at the stage of her high 22 school after a play? 23 MR. [REDACTED]: Objection to the form, lack of 24 foundation, standing objection. 25 THE WITNESS: At the instruction of my lawyer,

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Electronically signed by Rachel Bridge ([REDACTED])

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1 I must exercise my Fifth Amendment right.
 2 BY MS. EZELL:
 3 Q. Do you recall telling -- no, sorry.
 4 Did you and Jane No. 103 become friendly?
 5 MR. [REDACTED]: Object to the form, lack of
 6 foundation as to any relationship with Jane No. 103
 7 or knowledge of a person named Jane No. 103.
 8 Instruct the witness not to answer.
 9 THE WITNESS: At the instruction of my lawyer,
 10 I must invoke my Fifth Amendment right.
 11 BY MS. EZELL:
 12 Q. Do you remember that Jane No. 103 came to
 13 Mr. Epstein's home on or about July 23rd, 2004?
 14 MR. [REDACTED]: Object to the form, leading, as
 15 well as previously stated objection to the last
 16 question.
 17 BY MS. EZELL:
 18 Q. And do you remember --
 19 MR. [REDACTED]: Hold on.
 20 MS. EZELL: Sorry.
 21 THE WITNESS: At the instruction of my lawyer,
 22 I wish to invoke my Fifth Amendment right.
 23 BY MS. EZELL:
 24 Q. Do you remember that Jane No. 103 continued to
 25 come to Mr. Epstein's house and indeed came over 100

1 times over about a year and a half?
 2 MR. [REDACTED]: Object to the form for reasons
 3 previously stated in the last several questions.
 4 Instruct her not to answer.
 5 THE WITNESS: At the instruction of my lawyer,
 6 I must invoke my Fifth Amendment right.
 7 BY MS. EZELL:
 8 Q. Do you remember calling to tell Jane No. 103
 9 that Mr. Epstein would be coming in town and would like
 10 to see her?
 11 MR. [REDACTED]: Object to form, instruct the
 12 witness not to answer.
 13 THE WITNESS: At the instruction of my lawyer,
 14 I must invoke my Fifth Amendment right.
 15 BY MS. EZELL:
 16 Q. Did you overhear Mr. Epstein himself call Jane
 17 No. 103 at her home?
 18 MR. [REDACTED]: Object to the form, lack of
 19 foundation as to any knowledge of Jeffrey Epstein.
 20 Instruct her not to answer.
 21 THE WITNESS: At the instruction of my lawyer,
 22 I must invoke my Fifth Amendment right.
 23 BY MS. EZELL:
 24 Q. Did you and Jane No. 103 ever go shopping
 25 together?

1 MR. [REDACTED]: Same instruction, same
 2 objection.
 3 THE WITNESS: At the instruction of my lawyer,
 4 I must invoke my Fifth Amendment right.
 5 BY MS. EZELL:
 6 Q. Did, did you give yourself Jane No 103 any
 7 gifts?
 8 MR. [REDACTED]: I'm sorry, can you rephrase?
 9 BY MS. EZELL:
 10 Q. Did you yourself give Jane No 103 any gifts?
 11 MR. [REDACTED]: Objection to the form.
 12 Instruct the witness not to answer the question.
 13 THE WITNESS: At the instruction of my lawyer,
 14 I must invoke my Fifth Amendment right.
 15 BY MS. EZELL:
 16 Q. Did you ever buy gifts for Jeffrey Epstein to
 17 give to Jane No 103?
 18 MR. [REDACTED]: Objection to form.
 19 THE WITNESS: At the instruction of my lawyer,
 20 I must invoke my Fifth Amendment right.
 21 BY MS. EZELL:
 22 Q. Did you ever receive massages at the El Brillo
 23 Way house?
 24 MR. [REDACTED]: Objection to form, lack of
 25 foundation. Same instruction.

1 THE WITNESS: At the instruction of my lawyer,
 2 I must invoke my Fifth Amendment right.
 3 BY MS. EZELL:
 4 Q. Did you receive massages given by [REDACTED]
 5 [REDACTED]?
 6 MR. [REDACTED]: Objection to the form, lack of
 7 foundation as to any knowledge of a person named
 8 [REDACTED]. Lack of knowledge as to any, lack
 9 of foundation as to any connection to El Brillo
 10 Way. Instruct the witness not to answer.
 11 THE WITNESS: At the instruction of my lawyer,
 12 I must invoke my Fifth Amendment right.
 13 BY MS. EZELL:
 14 Q. [REDACTED]
 15 [REDACTED]
 16 MR. [REDACTED]: It's been asked and answered,
 17 objection to form.
 18 MS. EZELL: No, I didn't ask about Monterey,
 19 California.
 20 MR. [REDACTED]: You asked about any Edge Group
 21 meetings in California, and she said she has no
 22 idea what the Edge Group is.
 23 MR. GARCIA: I thought she took the Fifth on
 24 that.
 25 MR. [REDACTED]: I thought she said she didn't

1 know what the Edge Group was, but whatever, you can
 2 answer the question.
 3 THE WITNESS: At the instruction of my lawyer,
 4 I must choose to invoke my Fifth Amendment right.
 5 BY MS. EZELL:
 6 Q. Do you know Max Brockman?
 7 MR. [REDACTED]: I'm sorry, can you repeat?
 8 BY MS. EZELL:
 9 Q. Do you know a Max Brockman?
 10 MR. [REDACTED]: I believe that was asked and
 11 answered already, but --
 12 THE WITNESS: At the instruction of my lawyer,
 13 I must invoke my Fifth Amendment right.
 14 BY MS. EZELL:
 15 Q. Have you ever been photographed with Max
 16 Brockman at an Edge Science dinner?
 17 A. At the instruction of my lawyer, I must invoke
 18 my Fifth Amendment right.
 19 MR. [REDACTED]: You should let me -- I need to
 20 object to the form of the question first, but go
 21 ahead. I know we all want to get out of here. Go
 22 ahead.
 23 THE WITNESS: Say it again.
 24 MR. [REDACTED]: No, you are okay. Go ahead,
 25 Ms. Ezell. Thank you.

1 BY MS. EZELL:
 2 Q. Do you know whether Jeffrey Epstein attended
 3 the Edge Science dinner in Monterey, California?
 4 MR. [REDACTED]: Objection to the form, lack of
 5 foundation. Instruct the witness not to answer.
 6 THE WITNESS: At the instruction of my lawyer,
 7 I must invoke my Fifth Amendment right.
 8 BY MS. EZELL:
 9 Q. [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 At what age were those photographs taken?
 14 MR. [REDACTED]: I'm going to instruct her not
 15 to answer that. It has nothing to do with
 16 anything. It's not reasonably calculated to lead
 17 to discoverable evidence. We can move on.
 18 BY MS. EZELL:
 19 Q. Were you in any way damaged by that
 20 experience?
 21 MR. [REDACTED]: Same instruction. Let's move
 22 on.
 23 BY MS. EZELL:
 24 Q. Do you have any regrets?
 25 MR. [REDACTED]: Same instruction. Move on.

1 BY MS. EZELL:
 2 Q. Do you want to respond? I didn't give you
 3 time.
 4 MR. [REDACTED]: I've instructed her not to
 5 answer the question. Let's move on.
 6 BY MS. EZELL:
 7 Q. Do you recall a dinner at El Brillo Way
 8 attended by David Copperfield where Jane No. 103 was a
 9 guest?
 10 MR. [REDACTED]: Objection to the form, lack of
 11 foundation, and a standing objection as to her
 12 knowledge of anything involving El Brillo Way or
 13 Jeffrey Epstein. Instruct her not to answer.
 14 THE WITNESS: At the instruction of my lawyer,
 15 I must invoke my Fifth Amendment right.
 16 BY MS. EZELL:
 17 Q. What is the relationship between Jeffrey
 18 Epstein and David Copperfield?
 19 MR. [REDACTED]: Objection to form, lack of
 20 foundation as to her knowledge of either one of
 21 those people. Instruct her not to answer.
 22 THE WITNESS: At the instruction of my lawyer,
 23 I must invoke my Fifth Amendment right.
 24 BY MS. EZELL:
 25 Q. To your knowledge, do they recruit girls for

1 one another?
 2 MR. [REDACTED]: Object to the form, compound,
 3 and again, lack of foundation. Instruct her not to
 4 answer.
 5 THE WITNESS: At the instruction of my lawyer,
 6 I must invoke my Fifth Amendment right.
 7 BY MS. EZELL:
 8 Q. To your knowledge, are they involved in any
 9 sexual trafficking of young women?
 10 MR. [REDACTED]: Object to the form for the
 11 reasons previously stated. Also calls for a legal
 12 conclusion as to what sexual trafficking is.
 13 Instruct her not to answer.
 14 THE WITNESS: At the instruction of my lawyer,
 15 I must invoke my Fifth Amendment right.
 16 BY MS. EZELL:
 17 Q. I believe you asked about Allen Dershowitz
 18 earlier.
 19 MR. [REDACTED]: Twice.
 20 BY MS. EZELL:
 21 Q. And were instructed not to answer.
 22 MR. [REDACTED]: Twice.
 23 BY MS. EZELL:
 24 Q. All right. I'm going to ask again on behalf
 25 of my client. Are you aware of the friendship between

18 (Pages 433 to 436)

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Electronically signed by Rachel Bridge ([REDACTED])

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Allen Dershowitz and Jeffrey Epstein?

MR. [REDACTED]: And for the third time, I'll object to the form and instruct her not to answer the question.

THE WITNESS: For the third time, I take the advice of my lawyer and invoke my Fifth Amendment right.

BY MS. EZELL:

Q. When Allen Dershowitz comes to Palm Beach, he stays at the El Brillo mansion, doesn't he?

MR. [REDACTED]: Objection to the form. There is no foundation for her having any knowledge of anything having to do with a person by the name of Allen Dershowitz. I instruct her not to answer.

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

BY MS. EZELL:

Q. When Allen Dershowitz, or has Allen Dershowitz ever been there when young ladies came to give massages?

MR. [REDACTED]: Same objection stated to the previous question. Same instruction.

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

BY MS. EZELL:

Q. Has Allen Dershowitz ever been the beneficiary

BY MS. EZELL:

Q. Do you know that when David Copperfield is in town, he gives Jeffrey Epstein tickets and Jeffrey gives some to young women to attend those shows?

MR. [REDACTED]: Object to the form, multiple, compound question, and a complete lack of foundation. Instruct the witness not to answer.

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

BY MS. EZELL:

Q. And do you know that those girls are invited back stage after the show?

MR. [REDACTED]: Same objection, complete lack of foundation, and standing objection previously stated.

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

BY MS. EZELL:

Q. Do you remember on or about, in or about March of 2005 having conversations with one of the young women who came to the house to give massages about her conversations with Jane No. 103?

MR. [REDACTED]: Objection to the form, standing objection, lack of foundation. Instruct the witness not to answer, because the question implies

of those massages?

MR. [REDACTED]: Same objection and same instruction.

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

BY MS. EZELL:

Q. Do you know John Casablanca?

A. Never heard that name before.

Q. Have you ever heard of a world-famous illusionist whose stage name is David Copperfield?

MR. [REDACTED]: That's also been asked at least three times. I'll instruct her again not to answer the question.

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

BY MS. EZELL:

Q. Have you ever gone to one of David Copperfield's shows?

MR. [REDACTED]: Objection to form, lack of foundation as to knowledge of any person by the name of David Copperfield. Instruct her not to answer.

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

that she has any knowledge at all of El Brillo Way.

BY MS. EZELL:

Q. Same question -- sorry.

A. At the instruction of my lawyer, I must choose to invoke my Fifth Amendment privilege.

Q. Same question as to March of 2006.

MR. [REDACTED]: Same objection and same instruction.

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

BY MS. EZELL:

Q. Do you have any recollection of a conversation in which one of the [REDACTED] women told Jane No. 103 that those girls who, those girls who would help Jeffrey in regard to the investigation would be compensated and those who would not or who would hurt him in the investigation would be dealt with?

MR. [REDACTED]: Objection to the form, lack of foundation, compound question. Instruct the witness not to answer, because the question implies some knowledge of anything relating to a person by the name of Jeffrey Epstein.

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

1 BY MS. EZELL:

2 Q. Do you know John Brockman?

3 A. At the instruction of my lawyer, I must invoke
4 my Fifth Amendment right.

5 Q. Do you know of someone named Brockman being
6 the editor and publisher of a publication of the Edge
7 Foundation?

8 MR. [REDACTED]: Object to the form. There is
9 no foundation that she has any knowledge of any
10 entity by the name of the Edge Foundation, and I
11 would instruct her not to answer the question based
12 on her Fifth Amendment privilege.

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

15 BY MS. EZELL:

16 Q. Did you participate in a scheme by Jeffrey
17 Epstein to recruit underage girls to come to his
18 residence to provide massages?

19 MR. [REDACTED]: Objection to the form, calls
20 for a legal conclusion. Also has no foundation as
21 to any knowledge of a person by the name of Jeffrey
22 Epstein, and because it calls for a legal
23 conclusion, I'll simply instruct her not to answer
24 the question at all. Move on.
25

1 BY MS. EZELL:

2 Q. Did you assist, support, and facilitate
3 Jeffrey Epstein's child exploitation enterprise?

4 MR. [REDACTED]: Once again, objection the
5 question, calls for a legal conclusion as to what
6 is an enterprise, which is a term of art in the
7 criminal law about which this witness has no
8 knowledge, and it's a legal conclusion not likely
9 to lead to discoverable evidence. So I would
10 instruct her not to answer the question at all.

11 BY MS. EZELL:

12 Q. Did you arrange times for underage girls to
13 come to Jeffrey Epstein's residence?

14 MR. [REDACTED]: Objection to form, standing
15 objection previously stated.

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

18 BY MS. EZELL:

19 Q. Did you arrange, transport, or yourself
20 transport underage girls to or from Jeffrey Epstein's
21 residence?

22 MR. [REDACTED]: Same objection, same
23 instruction as the last question.

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

1 BY MS. EZELL:

2 Q. Did you escort those underage girls to the
3 massage room where the defendant would enter and urge
4 the girls to remove their clothes?

5 MR. [REDACTED]: Objection to the form, asks a
6 compound question, several questions within one.

7 Also assumes knowledge of a person by the name
8 of Jeffrey Epstein and a massage room, so there is
9 no foundation. Instruct the witness not to answer.

10 THE WITNESS: At the instruction of my lawyer,
11 I must invoke my Fifth Amendment right.

12 BY MS. EZELL:

13 Q. Did you ever tell the girls to remove their
14 clothes?

15 MR. [REDACTED]: Same objection and the same
16 instruction.

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

19 BY MS. EZELL:

20 Q. And did you sometimes deliver cash from the
21 defendant to the underage girls after they performed the
22 massage?

23 MR. [REDACTED]: That's been asked at least
24 three or four other times.

25 MS. EZELL: I'm asking on behalf of my client.

1 MR. [REDACTED]: I understand, but we've been
2 here for over an hour, and we can't just keep going
3 over. If they have been asked in the deposition,
4 your clients can have the benefit of the answer,
5 but we've been here now for almost eight hours and
6 you still --

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

9 BY MS. EZELL:

10 Q. Did you ever take part in delivering cash from
11 the defendant to the procurers of the underage girls who
12 came for the massage appointments?

13 MR. [REDACTED]: Objection to the form. The
14 term procure is a legal term of art, and I'll
15 instruct the witness not to respond to the question
16 at all.

17 BY MS. EZELL:

18 Q. Did you, did you by using the telephone assist
19 Jeffrey Epstein in enabling himself to commit sexual
20 battery on, and acts of lewdness in the presence of
21 [REDACTED] women?

22 MR. [REDACTED]: Same as the previous
23 instruction. Instruct the witness not to answer
24 the question at all, because it results in a legal
25 question, not a factual question, so it's not

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

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

1 deposition or you may waive reading and allow the
2 court reporter to simply type it up and distribute
3 it to the lawyers who order it.
4 Do you choose to read or waive?
5 THE WITNESS: Waive.
6 MS. EZELL: Thank you.
7 MR. [REDACTED]: Thank you.
8 THE VIDEOGRAPHER: Okay, this concludes
9 today's videotape deposition of [REDACTED]. The
10 time is 18:51.
11 (Witness excused.)
12 (Deposition was concluded.)
13
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1 CERTIFICATE
2 THE STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5 I, Rachel W. Bridge, Registered Professional
6 Reporter, Florida Professional Reporter and Notary
7 Public in and for the State of Florida at large, do
8 hereby certify that I was authorized to and did report
9 said deposition in stenotype; and that the foregoing
10 pages are a true and correct transcription of my
11 shorthand notes of said deposition.
12 I further certify that said deposition was
13 taken at the time and place hereinabove set forth and
14 that the taking of said deposition was commenced and
15 completed as hereinabove set out.
16
17 I further certify that I am not attorney or
18 counsel of any of the parties, nor am I a relative or
19 employee of any attorney or counsel of party connected
20 with the action, nor am I financially interested in the
21 action.
22
23 The foregoing certification of this transcript
24 does not apply to any reproduction of the same by any
25 means unless under the direct control and/or direction
of the certifying reporter.
Dated this 9th day of April, 2016.
[REDACTED] RR, FPR

21 (Pages 445 to 448)

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Electronically signed by Rachel Bridge ([REDACTED])

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