

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 502008CA028051XXXXMB AB

Plaintiff,
-vs- VOLUME I OF II
JEFFREY EPSTEIN,
Defendant.

VIDEO-CONFERENCED AND VIDEOTAPED DEPOSITION OF

Thursday, September 24, 2009
9:40 - 5:52 p.m.

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting

Appearances continued:

On behalf of the Defendant, Jeffrey Epstein:
ROBERT D. CRITTON, JR., ESQUIRE
MARK T. LUTTIER, ESQUIRE
BURMAN, CRITTON, LUTTIER & COLEMAN, LLP

Phone:

On behalf of the Defendant, Jeffrey Epstein:
JACK ALAN GOLDBERGER, ESQUIRE
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Phone:

ALSO PRESENT: Jeffrey Epstein, via video conference
Michael Downey, Videographer
Visual Evidence, Incorporated

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WITNESS: DIRECT CROSS REDIRECT RECROSS

BY MR. LUTTIER 10

APPEARANCES:

On behalf of the Plaintiff:
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On behalf of:
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On behalf of:
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On behalf of:
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PROCEEDINGS

THE VIDEOGRAPHER: We're on the videotape record. This is the 24th day of the year. The time is approximately 9:46 a.m. This is the videotape deposition of in the matter of Plaintiff versus Epstein, Defendant.

This deposition is being held at. My name is Michael Downey. I'm the videographer employed by Visual Evidence.

Will the attorneys please announce their appearances for the record.

MR. EDWARDS: Brad Edwards representing

MR. HOROWITZ: Adam Horowitz, counsel for Plaintiffs

MR. KUVIN: Spencer Kuvin on behalf of

MR. GOLDBERGER: Jack Goldberger on behalf of Jeffrey Epstein.

MR. CRITTON: Bob Critton on behalf of Jeffrey Epstein.

MR. LUTTIER: Mark Luttier on behalf of Jeffrey Epstein.

MR. EDWARDS: Before we get started, I know

1 that we're going to use real names during this
2 deposition rather than pseudonyms. I just want to
3 make sure that we're all on the same page that when
4 the court reporter types it up, it's going to be
5 typed up in the transcript as the initials like we
6 have in previous depositions.

7 MR. CRITTON: That, that's fine, but keep in
8 mind that we need, because a number of the
9 individuals have multiple first initials and you
10 have used initials that don't even match your
11 clients' names.

12 So we're going to have to -- Cindy, you're
13 going to need to, ultimately when you finish, if
14 this is agreeable with everyone, I think we did
15 this before is type up a key and then you can give
16 that only to the lawyers and do that as just a
17 privileged or as a confidential document, so that
18 we can insert those in.

19 MR. EDWARDS: Along those same lines, as this
20 is being videotaped, I imagine in agreement amongst
21 the parties this will remain confidential except in
22 the case that there is a court order that the
23 videotape and her image is made public in any way.
24 So, if it's going to be made public in any way,
25 then, I just ask that it only happen by way of some

1 court order, either by way of Marra or Judge
2 Hafele.

3 MR. CRITTON: This is only being done in the
4 case. And I will tell you what you can do
5 is -- we won't agree to that because Mr. Kuvn
6 apparently gave Mr. Epstein's video to Jose
7 Lambiet, which was then immediately put on the
8 Post, and then ended up on, all over the country.
9 And he certainly had no issue associated with
10 confidentiality. So, whatever rules apply.

11 What I will tell you is with regard to the
12 video today, we'll give you whatever time you think
13 is necessary -- well, let's do it this way: Within
14 ten days from today you file a motion for
15 protective order in front of Hafele with regard to
16 this deposition, and we'll agree that it will
17 not -- we won't touch it.

18 MR. EDWARDS: I don't see how that's necessary
19 since we already have the Judge's agreed, we have
20 an agreed order that we can proceed anonymously.
21 Judge Hafele, as you know, has been very careful in
22 instructing yourself and everybody else in this
23 case that these individuals are to remain
24 anonymous. And obviously publishing this video in
25 any public forum will decrease or eliminate any

1 anonymity here. And I am not going to agree to
2 that, so --

3 MR. CRITTON: Well, I can tell you I wouldn't
4 put a video on. I would not put a video that would
5 identify this individual, you're client's face.
6 All right. I would do nothing to identify her
7 face. So, her anonymity would be, quote, unquote,
8 preserved if that's your issue.

9 MR. EDWARDS: My issue is only preserving her
10 anonymity. So, I mean, are we in agreement that
11 this is not going to be a video published in a
12 public forum or any way outside of use in a
13 courtroom to be seen by the judge?

14 MR. CRITTON: To the extent her picture or her
15 name would be used, I agree with that. Other than
16 that, just go to the court. And as I said, you can
17 file a motion with the court. If your position is
18 is that the deposition, again assuming there is
19 complete anonymity and her face is blotted out,
20 that the video cannot be filed with the court or
21 used in some other fashion, right, I agree. We're
22 not going to do anything that in any way impacts
23 the anonymity absent an order from Judge Hafele in
24 this particular case.

25 MR. EDWARDS: All right. We're in agreement

1 then. Okay.

2 MR. CRITTON: But, but I want to be clear, it
3 is to the extent that if the, you still need to
4 file a motion with the court to the extent that you
5 don't, that it's your position that even if her
6 face was blotted out and even if no names are used,
7 and you think that the video is to remain
8 confidential, then you should file something with
9 the court. And I'll give you, like I said I will
10 give you ten days so you can proceed to file that
11 motion.

12 MR. EDWARDS: Okay. So it's your intention to
13 use this video, blot her face out and then post it
14 somewhere?

15 MR. CRITTON: I have no intentions at all.

16 MR. EDWARDS: Okay.

17 MR. CRITTON: And if you had brought this up
18 in a motion earlier, I would have addressed it at
19 the same time.

20 MR. EDWARDS: I think we're all on the same
21 page that the victims in this case are to remain
22 anonymous. I mean, everybody has been warned
23 repeatedly about using names outside of the
24 pseudonyms and exposing faces, things like that, to
25 the public outside of the court.

1 MR. CRITTON: I am aware of the court order.
2 I am also aware that [REDACTED] is a public
3 figure now because her lawyers chose to disclose
4 her name.

5 MR. EDWARDS: Right. And that was her choice.

6 MR. CRITTON: Everything associated with the
7 her is public.

8 MR. EDWARDS: Right.

9 MR. CRITTON: I'm aware of the other court
10 orders in, that are in place and I think, well, I
11 think we have said enough.

12 MR. EDWARDS: Okay. Agreed.

13 MR. LUTTIER: Would you please state your
14 name.

15 THE COURT REPORTER: I need to swear the
16 witness.

17 MR. LUTTIER: Okay.

18 Thereupon,

19 [REDACTED]
20 having been first duly sworn or affirmed, was examined
21 and testified as follows:

22 DIRECT EXAMINATION

23 BY MR. LUTTIER:

24 Q. Would you please state your full name, ma'am.

25 A. [REDACTED]

1 Q. What's your middle name?

2 A. [REDACTED]

3 Q. (Mr. Luttier spelled her middle name.)

4 A. Yes.

5 Q. Is there [REDACTED] at the end of it?

6 A. No.

7 Q. Okay. [REDACTED], have you ever been deposed
8 before?

9 A. Yes.

10 Q. When was the last time you were deposed?

11 A. The date was -- I don't know when the date
12 was, but it was the last time with Jeffrey Epstein.

13 Q. What do you mean by "with Jeffrey Epstein"?

14 A. I was deposed with Jeffrey Epstein on
15 behalf -- I don't know, Jim Eisenberg, the guy who is
16 actually upstairs from here. I don't know the name.

17 Q. Who do -- what guy is upstairs? Who are you
18 talking about?

19 A. You know the last time I was deposed.

20 Q. I don't know of any, ma'am. I assure you I
21 don't know of any time you have been deposed, so that's
22 what I am trying to find out.

23 A. You don't.

24 Q. No.

25 A. Okay. When was the last time I was deposed?

1 I don't know.

2 Q. Okay. How many times have you been deposed?

3 A. Once that I know of.

4 Q. Are you referring to an incident where you
5 gave a sworn statement to the FBI? Is that what you are
6 referring to?

7 A. Yes, sir.

8 Q. That's what you -- when you said you were
9 deposed one time, that's the incident that you're
10 referring to?

11 A. Yes, sir.

12 Q. What is your current address?

13 A. [REDACTED]

14 [REDACTED]

15 Q. And is that an apartment?

16 A. Yes, sir.

17 Q. Is it in a development?

18 A. Yes, sir.

19 Q. What development is it in?

20 A. [REDACTED]

21 Q. And where is that located?

22 A. [REDACTED]

23 Q. How long have you lived there?

24 A. [REDACTED]

25 Q. And does anybody live with you at that address

1 currently?

2 A. My son.

3 Q. And what is your son's name?

4 THE WITNESS: Do I have to say my son's name?

5 MR. EDWARDS: I am, I am going to instruct her
6 not to answer. This is a minor child and she's
7 going to keep her son out of this litigation. This
8 is a [REDACTED] boy.

9 MR. LUTTIER: Is that some basis --

10 THE WITNESS: I don't know why it's relevant
11 to you to have my son's name. I have a
12 [REDACTED] son.

13 MR. EDWARDS: Yeah, the basis of the objection
14 is that your client is a convicted felon and a sex
15 offender. This is a victim and she is in fear for
16 the safety of her son. And because of that fear,
17 she's not going to provide anymore identifying
18 information about her [REDACTED] son.

19 BY MR. LUTTIER:

20 Q. Do you adopt what your lawyer just said?

21 MR. EDWARDS: Don't answer.

22 THE WITNESS: I agree.

23 MR. EDWARDS: Don't answer.

24 BY MR. LUTTIER:

25 Q. Do you have some fear for the safety of your

1 son?

2 A. Yes, sir.

3 Q. And what is your fear?

4 A. Are you kidding me? What is my fear?

5 Q. I can tell you, ma'am, there is nothing here
6 at all today that I am going to be asking you that's a
7 joke or that I am kidding you about.

8 A. Okay.

9 Q. Okay. So what is the fear that you have for
10 your son?

11 A. I don't know if you have kids --

12 Q. Yeah, I do, ma'am.

13 A. All right. Well, then, if you were in this
14 deposition, I am in fear that this, this criminal,
15 Jeffrey Epstein, could harm him in some way later on in
16 life like he's harmed me and many other women or girls
17 as that. And I don't want this to be publicity later on
18 in life for him to see what his mother has been through.
19 That's why I am in fear for him.

20 Q. Okay. Can you tell me specifically what it is
21 that you fear, what specific --

22 A. I just told you.

23 Q. -- act that you fear is going to happen to
24 your son?

25 A. Psychological, mental physical matters for my

1 son.

2 Q. Can I, can I assume that you would take
3 whatever steps you deem necessary to protect your son
4 any time you felt that he was in any kind of danger?

5 A. Yes, sir.

6 Q. And could I assume that historically, that is
7 throughout his life as long as he has been born, you
8 have always done anything you could to protect him from
9 any situation where he was put in danger; is that right?

10 A. Yes, sir.

11 Q. And if somebody puts your son in danger, you
12 know how to file a lawsuit against them and protect them
13 and things like that, right?

14 A. Yes, sir, but I don't want to get to that
15 point. That's why I am not going to disclose his name.

16 Q. Well, you have filed this lawsuit, right?

17 A. For my, for my sake, yes.

18 Q. And you would file a lawsuit to protect your
19 son if that's what you had to do, would you not?

20 A. Yes, I would.

21 Q. Would it be a fair statement to say that your
22 son is the most important thing to you in your life?

23 A. Yes.

24 Q. Okay.

25 A. Yes, yes, yes.

1 Q. All right. So, you have a [REDACTED]
2 Somewhere I think I read his name was [REDACTED]
3 or something like that. And have you and he lived just
4 the two of you at this apartment since [REDACTED]?

5 A. Yes.

6 Q. Has anyone else lived with the two of you at
7 that apartment since [REDACTED]?

8 A. Yes.

9 Q. Who else has lived there?

10 A. [REDACTED]

11 Q. How do you spell that last name?

12 A. [REDACTED]

13 Q. And for what period of time has [REDACTED]
14 lived there?

15 A. For seven months now.

16 Q. Is he living there now?

17 A. Yes.

18 Q. And is there some relationship between
19 [REDACTED] and yourself?

20 A. Yes.

21 Q. What is that relationship?

22 A. He is my current boyfriend.

23 Q. And what is [REDACTED] occupation?

24 A. He is -- he does [REDACTED]

25 Q. Does he work for someone or is he

1 self-employed?

2 A. He works for [REDACTED]

3 Q. Has anyone else ever lived with you and your
4 son since [REDACTED]?

5 A. No, sir.

6 Q. Prior to, that is immediately before you moved
7 into the [REDACTED], where did you live?

8 A. On [REDACTED]

9 Q. What was the address?

10 A. From what I recall [REDACTED]

11 [REDACTED]
12 Q. And whereabouts is that located in [REDACTED]?

13 A. On [REDACTED]

14 Q. What kind of structure was that?

15 A. A townhouse.

16 Q. And how long did you live there?

17 A. I lived there for about seven months. I'm not
18 really sure on that.

19 Q. Okay. Since approximately somewhere around
20 [REDACTED]?

21 A. [REDACTED]. I'm, I'm really not sure.

22 Maybe -- you know what, it was [REDACTED].

23 [REDACTED]. [REDACTED] I moved in.

24 Q. Okay. And something, it sounds like something
25 that you were able to refer to that triggered your

1 memory as to when that was?

2 A. Yes.

3 Q. What was, what incident that triggered your
4 memory about when that was?

5 A. [REDACTED].

6 Q. [REDACTED]?

7 A. Yes.

8 Q. How do you know that it was [REDACTED] -- was
9 there something that triggered [REDACTED] that you
10 recalled about that day?

11 A. Yes, because I moved in before [REDACTED] and I
12 had to get the [REDACTED] set up.

13 Q. Did anyone -- I assume your son lived with you
14 when you were at [REDACTED]?

15 A. Always.

16 Q. Did anyone else live with you while you were
17 at [REDACTED]?

18 A. No, sir.

19 Q. Are you currently employed?

20 A. No, sir.

21 Q. What are your -- what is your current means of
22 support?

23 A. I have a loan from school.

24 Q. And what school is that?

25 A. [REDACTED].

1 Q. And where is that located?

2 A. On [REDACTED].

3 [REDACTED].
4 Q. And are you pursuing some course of study
5 there?

6 A. Yes.

7 Q. And what course of study are you pursuing?

8 A. [REDACTED].

9 Q. Is that an institution where you obtain a
10 degree upon completion of your studies?

11 A. I am doing this to be [REDACTED]. I got my
12 [REDACTED].

13 [REDACTED] so I can be [REDACTED].

14 Q. When you complete your studies there, what
15 will you get to signify that you have completed that
16 course of study?

17 A. I would have to take the national exam, and I
18 would be [REDACTED].

19 Q. So, would you get a certificate?

20 A. Yes.

21 Q. And then after you get your certificate,
22 you're required to take some kind of exam?

23 A. Yes.

24 Q. Or do you have to take the exam to get the
25 certificate?

1 A. I have to take the exam in order for me to get
2 the certificate to be licensed.

3 Q. And is the certificate the same thing as being
4 [REDACTED]
5 something separate that you have to go through?

6 A. In order for me to get licensed to be a
7 [REDACTED], I have to take something called the
8 [REDACTED], I think it's called. And after I pass the test,
9 then I will receive my license.

10 Q. When did you start your studies at [REDACTED]
11 [REDACTED]?

12 A. [REDACTED].

13 Q. Of [REDACTED]?

14 A. Of [REDACTED].

15 Q. [REDACTED]. So you [REDACTED] started?

16 A. Yes.

17 Q. Had you ever attended that institution before?

18 A. Yes.

19 Q. When had you previously attended that
20 institution?

21 A. [REDACTED].

22 Q. Do you recall when?

23 A. No, sir.

24 Q. Was it located at the same location when
25 you --

1 A. Yes, sir.

2 Q. -- attended there previously? And for what
3 purpose had you previously attended it?

4 A. To be a licensed [REDACTED].

5 [REDACTED].

6 Q. And how long a course of study was that?

7 A. [REDACTED].

8 Q. Is that how long you attended it in [REDACTED] was
9 [REDACTED]?

10 A. Yes, sir.

11 Q. And then upon completion of that course of
12 study, did you then take a test and get a license as an
13 [REDACTED]?

14 A. Yes.

15 Q. And about when did you get your license?

16 A. I am pretty sure it was the beginning of [REDACTED].

17 Q. And that licensure was issued by the [REDACTED]
18 [REDACTED]?

19 A. Yes.

20 Q. Did you use your license after you got it in
21 the beginning of [REDACTED]?

22 A. Yes.

23 Q. How did you use it?

24 A. I worked at [REDACTED].

25 Q. What's the name of that?

1 A. [REDACTED].

2 Q. How do you spell that?

3 A. [REDACTED].

4 Q. [REDACTED]?

5 A. Yes.

6 Q. And where is that located?

7 A. That is located on [REDACTED]. Or, excuse me [REDACTED].

9 (Ms. Ezell entered the deposition.)

10 BY MR. LUTTIER:

11 Q. Is that in like a strip mall center?

12 A. Yes.

13 Q. And what did you do at [REDACTED]?

14 A. I was an [REDACTED].

15 Q. What is an [REDACTED]?

16 A. Facial [REDACTED].

17 Q. And what did you do as a [REDACTED]?

18 A. I performed [REDACTED].

19 Q. And, and basically that's [REDACTED]?

20 [REDACTED], that kind of thing?

21 A. No, sir.

22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

1 Q. And for what period of time did you work at [REDACTED]?

2 A. That's when the economy kind of went down, so
3 I didn't work there for a long period of time because
4 they were allowing me so many hours. I want to say
5 three months.

6 Q. And that, would that be starting in the
7 beginning of [REDACTED], like [REDACTED]?

8 A. I don't want to say because I'm not positively
9 sure.

10 Q. So, let me ask you this: Is that your best
11 estimate?

12 THE WITNESS: Okay. Bless you.

13 MR. EDWARDS: Excuse me. Excuse me.

14 THE WITNESS: Sometime maybe after [REDACTED].

15 MR. LUTTIER: Of [REDACTED]?

16 THE WITNESS: But like I said, I'm not sure.

17 BY MR. LUTTIER:

18 Q. That's after [REDACTED] of [REDACTED]?

19 A. Yes, sir. I am not exactly sure.

20 Q. Okay. I understand it's your estimate and
21 your best estimate is you worked there for approximately
22 three months?

23 A. Yes, sir.

24 Q. Which would take you from [REDACTED] to about [REDACTED]?

1 or [REDACTED] of [REDACTED]?

2 MR. EDWARDS: Object to the form.

3 THE WITNESS: No. I'm not sure.

4 MR. LUTTIER: Okay.

5 THE WITNESS: Maybe a couple months before

6 [REDACTED] I'm not sure. There is record on my -- I

7 have pay stubs. I don't know.

8 BY MR. LUTTIER:

9 Q. Okay. How did you get that job?

10 A. I filled out a resume and I walked into the
11 place and I asked for a job.

12 Q. And do you have a copy of your resume?

13 A. Yes. Not with me.

14 Q. Did you know anyone at that place of business?

15 A. No.

16 Q. Was that the only place of business that you
17 submitted your resume to?

18 A. No, sir.

19 Q. Who else did you submit your resume to?

20 A. To a couple [REDACTED] around [REDACTED].

21 Q. Did you interview for the job?

22 A. Not for the other jobs. I interviewed for

23 [REDACTED] and they took me in.

24 Q. Do you recall who you interviewed with?

25 A. No, sir.

1 Q. Did you know anyone at [REDACTED] before
2 you went to work there?

3 MR. EDWARDS: Object to the form.

4 THE WITNESS: I told you, no, sir.

5 BY MR. LUTTIER:

6 Q. Did you know anyone else that had ever
7 worked --

8 A. No, sir.

9 Q. -- there? And what were the terms of your
10 employment?

11 A. I worked, sometimes I would work four hours
12 from 9 to -- sometimes I would work from -- well, 9 to 1
13 three days a week, and other -- it was -- I was pretty
14 much on call because they just [REDACTED] had opened and
15 the economy was going down at that time, and she
16 couldn't really afford to have me there as much as I
17 wanted to be there.

18 Q. Who is the "she" you're referring to?

19 A. I don't remember her name.

20 Q. Was it the owner?

21 A. Yes.

22 Q. And you don't -- do you recall the name of who
23 your supervisor was or the person that you reported to?

24 A. No, sir.

25 Q. Do you recall the name of anyone at [REDACTED]?

1 [REDACTED] that was employed there or an owner there?

2 A. No, sir. I didn't get close to anyone there.

3 I just, I was the only [REDACTED]

4 Q. How many other employees were there?

5 A. There was actually only three other employees.

6 Q. Do you know the names of the other employees?

7 A. No, sir.

8 Q. What other services were rendered at [REDACTED]

9 [REDACTED]

10 A. [REDACTED]

11 Q. Anything else?

12 A. No, sir. [REDACTED]

13 [REDACTED]

14 Q. And what were the terms of your employment in
15 terms of what you got paid?

16 A. I think she started me off at -- here again I
17 am not sure. I think she started me off around [REDACTED]
18 maybe.

19 Q. Per hour?

20 A. Yes. And then gradually I would work by
21 commission but not many people came in. So, all in all
22 it didn't really work out financially for myself and my
23 family.

24 Q. Did there come a time that she increased the
25 hourly wage --

1 A. No, sir.

2 Q. -- that you were being paid?

3 A. No, sir.

4 Q. Did there -- when you originally were hired,
5 were you hired on an hourly basis?

6 A. Yes, sir.

7 Q. Did there come a time that the basis of your
8 employment or your pay changed?

9 A. No, sir.

10 Q. So, you were always paid hourly by the owner
11 of the establishment?

12 A. Yes.

13 Q. Did you receive any other compensation from
14 anyone else while you were working there? For example,
15 did people or clients of yours that you did work on give
16 you tips?

17 A. No, sir.

18 Q. You mentioned something in an earlier answer
19 about being on a commission basis. What did you mean by
20 that?

21 A. As time went on she said you can work off of
22 commission, but no one came in. I didn't make a
23 commission.

24 Q. Did you agree to change the terms of your
25 employment from hourly to commission basis?

1 A. Yes, sir, but that never ended up, that never
2 went through.

3 Q. So there did come a time that the basis of
4 your, the terms of your employment in terms of how you
5 got paid changed?

6 A. I'm going to say no because she said that I
7 was going to make commission. No one came in. Okay.
8 So I didn't make any commission.

9 Q. So she continued to pay you hourly?

10 A. Yes, sir.

11 Q. Were you supposed to get commissions on top of
12 your hourly wages?

13 A. If I worked there longer, yes, but no.

14 Q. And you still don't know the name of this
15 person that you have referred to as "she"?

16 A. No, sir, I don't know the name of anyone
17 there.

18 Q. Okay. Did you participate in any type of
19 promotion for the business?

20 A. No, sir.

21 Q. Any kind of advertisement or anything like
22 that?

23 A. No, sir.

24 Q. Was your name or likeness, picture or likeness
25 used in any kind of promotions?

1 A. No, sir.

2 Q. Were you given any information from the owner
3 of this [REDACTED] as to how to solicit clients?

4 A. No, sir.

5 Q. When you, other than your attendance at the
6 [REDACTED] starting in
7 [REDACTED] had you attended that institution on any
8 prior occasion before that?

9 A. No, sir.

10 Q. So [REDACTED] was the first time you went
11 there?

12 MR. EDWARDS: Object to the form?

13 BY MR. LUTTIER:

14 Q. Correct? Was [REDACTED] the first time
15 you went to the [REDACTED]?

16 MR. EDWARDS: Object to the form.

17 THE WITNESS: What does this mean?

18 MR. EDWARDS: You can answer if you know the
19 answer. If you don't know the answer --

20 THE WITNESS: From my knowledge, yes, I went
21 there. I attended the [REDACTED] two
22 times.

23 MR. LUTTIER: Okay.

24 THE WITNESS: Okay. One in [REDACTED] and one right
25 now.

1 BY MR. LUTTIER:

2 Q. How did you become familiar with or know about
3 the [REDACTED]?

4 A. Maybe the Yellow Pages. Some source of
5 information on the Internet.

6 Q. Do you recall which it was? Was it the Yellow
7 Pages or was it the Internet?

8 A. Yellow pages dot com, [REDACTED].

9 Q. That's how you found it?

10 A. Yes, sir.

11 Q. And are you a person that considers yourself
12 to be computer proficient?

13 A. No, sir.

14 Q. Do you use the computer on a regular basis?

15 A. [REDACTED] I have been.

16 Q. What do you mean by "[REDACTED]"?

17 A. [REDACTED] I have been selling a couple of items
18 [REDACTED]

19 Q. What kind of items?

20 A. Items around the house like dresses, shoes,
21 [REDACTED] items that I have.

22 Q. Are, are you selling [REDACTED] items as a
23 [REDACTED] for [REDACTED]?

24 A. I, I [REDACTED] in them in [REDACTED]. I never pursued
25 it. So, as of right now I am taking the products that I

1 do have and I am selling them.

2 Q. Okay. When you say that you [REDACTED] with
3 [REDACTED] in [REDACTED], what do you mean?

4 A. I paid [REDACTED] worth of [REDACTED]
5 so I could profit.

6 Q. Turn around and sell it for a profit?

7 A. Yes, sir.

8 Q. Did you execute some paperwork to become a
9 [REDACTED] for lack of a better term with [REDACTED]?

10 A. Yes, sir.

11 Q. Did you deal with someone that was affiliated
12 with [REDACTED] when you first began to do that?

13 A. Yes, sir.

14 Q. And who was that?

15 A. [REDACTED]

16 Q. Did you say [REDACTED]?

17 A. [REDACTED]

18 Q. [REDACTED]?

19 A. Yes, sir. I don't know her last name.

20 Q. And how did you get in touch with her?

21 A. Through a friend.

22 Q. And who was the friend?

23 A. [REDACTED]

24 Q. [REDACTED] what?

25 A. I don't know.

1 Q. You don't know your friend's last name?

2 A. No, I don't know my friend's last name.

3 Q. And you don't know [REDACTED] last name?

4 A. No.

5 Q. How long did you know this friend [REDACTED]?

6 A. I knew her from the neighborhood I used to
7 live in when I was ten years old. I met her when I was
8 ten years old and then I bumped into her at a store. We
9 exchanged phone numbers. She introduced me to [REDACTED] and
10 I started [REDACTED]

11 Q. And although you knew this person since you
12 said you were [REDACTED] old, you can't recall her last
13 name; is that right?

14 A. That's right.

15 Q. Is there -- by the way, do, do you have any
16 problem with your memory that you're aware of?

17 A. Yes.

18 Q. What is your problem with your memory?

19 A. With a lot of negative situations, I tend to
20 not really, I don't really care to remember them. I
21 just live every day as it comes as positive as I can. I
22 try to exclude any negativity. And when it comes to
23 negativity, I choose, I guess I choose not to remember
24 it.

25 Q. Is there a difference between attempting to

1 block out some negative thing and not being able to
2 remember the negative thing?

3 A. Okay.

4 MR. EDWARDS: Object to the form.

5 THE WITNESS: I, I do choose to block out. I
6 remember but I do choose to block out.

7 BY MR. LUTTIER:

8 Q. So, you would say you're a positive type
9 person?

10 A. Yes, sir.

11 Q. You believe in positive thinking as opposed to
12 negative thinking?

13 A. Yes, sir.

14 Q. You put behind you those things that you don't
15 think were positive for you and you choose to
16 concentrate on those things that are positive?

17 A. Choose to concentrate on positive things.

18 Q. Are you a person that you would say is a
19 forward-looking person; that is a person that looks to
20 the future as opposed to the past?

21 A. I look to the, I looked to the, I look to the
22 future, but the past does haunt me.

23 Q. Okay. Now, you mention that although you try
24 to block these things that you do remember them. So, I
25 want to go back and ask you if you remember last name of

1 [REDACTED]
2 A. No, sir. When I was ten, I really didn't care
3 to know anybody's last name.

4 Q. Well, you said you first met her when you were
5 ten, right?

6 A. Yeah. She was an acquaintance.

7 Q. And so how long did you know her, from ten
8 until now?

9 A. No, I knew of her, but she was a girl in my
10 neighborhood that we just saw once in a while. And then
11 as we got older, I don't know where she was. But I
12 bumped into her at a store. And I'm like, hey, aren't
13 you [REDACTED] from the neighborhood. Oh, you have a kid;
14 cool, I have a kid too. Let me get your number. Let me
15 see how you're doing in life. I don't know her last
16 name.

17 Q. Okay. But in any event, she's the one that
18 introduced you to the concept of [REDACTED]

19 MR. EDWARDS: Object to the form.

20 MR. LUTTIER: Right?

21 THE WITNESS: Yes.

22 BY MR. LUTTIER:

23 Q. Was she a person who that was selling [REDACTED]
24 [REDACTED]?

25 A. Yes.

1 Q. Did she have some kind of franchise with them?

2 A. I am pretty sure. She worked for [REDACTED]
3 She introduced me to [REDACTED] [REDACTED] signed me up.

4 Q. When you say signed you up, what do you mean?

5 A. I filled out paperwork to hand over [REDACTED]
6 [REDACTED]

7 Q. And did -- was part of the arrangement that
8 [REDACTED] would receive some sort of compensation or a
9 portion of your sales?

10 A. Not that I know of. Who knows? I don't know.
11 It was just an opportunity that I went for and found out
12 that it wasn't for me.

13 Q. Did you read the document that you signed?

14 A. I didn't read up to the point where it said
15 that she was going to get profit. I didn't really care
16 if she got a profit. If she did, good.

17 Q. The question was, did you read the document
18 that you signed?

19 A. Part of it.

20 Q. And what part did you read?

21 A. That I will be spending [REDACTED] so
22 I can [REDACTED]

23 Q. Do you have a copy of the document?

24 A. No, sir.

25 Q. What happened to the document?

1 A. I don't know.

2 Q. Was it your practice to keep important legal
3 papers that you sign?

4 MR. EDWARDS: Object to the form.

5 THE WITNESS: Yes. That wasn't very important
6 to me.

7 BY MR. LUTTIER:

8 Q. What sort of important legal documents do you
9 keep? Or excuse me, what sort of important document do
10 you keep?

11 A. Keep my tax returns. I keep my son's [REDACTED]
12 I keep all of my son's records. I keep my Social
13 Security card. I keep money orders that when I pay the
14 bills.

15 Q. Anything else that you can think of?

16 A. No, sir.

17 Q. After you had this happenstance meeting with
18 [REDACTED] did you ever have any other communication with
19 her?

20 A. We had a couple of [REDACTED] meetings. Well,
21 we had actually one [REDACTED] meeting at my house
22 together, and we had attended [REDACTED] together one time.

23 Q. Did you ever actually sell any of the
24 product that you had purchased for [REDACTED]?

25 A. Yes.

1 Q. And during what period of time did you
2 actually sell product?

3 A. When I first started, and I would just keep
4 the products in my trunk. And if I was out on the
5 street at a gas station or going to the grocery store,
6 wherever I was, I would ask a woman if they would like
7 some [REDACTED] [REDACTED] And if they did, I proceeded to
8 sell them to that woman.

9 Q. Did you have -- was that your sole source of
10 support at the time?

11 A. No, sir.

12 Q. What other source of support did you have?

13 A. At what period of time?

14 Q. You what?

15 A. At what period of time?

16 Q. During the period of time while you were [REDACTED] in
17 selling [REDACTED] [REDACTED] which you said you [REDACTED]
18 [REDACTED] And do you recall when in [REDACTED] approximately?

19 A. That was my, not my only source of income, no.

20 Q. Approximately when did you initially [REDACTED] in
21 [REDACTED]?

22 A. I couldn't tell you.

23 Q. Roughly.

24 MR. EDWARDS: Object to the form.

25 MR. LUTTIER: I am not owing you to a specific

1 date. Within two months.

2 MR. EDWARDS: Object to the form. If you
3 know, answer; if you don't know, you don't know.

4 MR. LUTTIER: You can't recall?

5 THE WITNESS: I can't recall.

6 BY MR. LUTTIER:

7 Q. Okay. And for how long did you sell these
8 products?

9 A. Sir, I took the products. They weren't my
10 full source of income. I sold them whenever I sold
11 them. When I was at a gas station, maybe I would

12 [REDACTED] When I was at the grocery store, I might
13 [REDACTED] It wasn't my full source of income.

14 It was just a little gas change.

15 Q. Okay. And at some point you stopped
16 attempting to sell the product and decided to try to
17 sell them over [REDACTED]?

18 A. Yes.

19 Q. What, what other source of income did you have
20 while you were trying to sell [REDACTED]?

21 A. I was working in and out of [REDACTED].

22 Q. In the year [REDACTED] -- and you have testified
23 earlier that, I think you said about [REDACTED] is when you
24 first went to, to this [REDACTED] -- did you
25 have any source of support, financial support?

1 A. Yes, yes.

2 Q. What were your sources of financial support in
3 [REDACTED]?

4 A. I had a boyfriend that supported me, my son
5 and I.

6 Q. And what, what was that boyfriend's name?

7 A. [REDACTED].

8 Q. [REDACTED]

9 A. [REDACTED]

10 Q. And did he provide the sole support for your
11 and son, you and your son?

12 A. Yes, he did.

13 Q. Did he live with you at some point in time?

14 A. I lived with him at some point in time.

15 Q. And when was that?

16 A. That was in -- I just turned -- I was 18 when
17 I got with him, and I just turned 19. And we were
18 together for, we lived together for around five months.

19 Q. What did you mean when you said you got with
20 him when you were 18?

21 A. We started dating when I was 18. I moved in
22 his house when I was 18 and then I turned 19. I
23 remember having my 19th birthday. We lived together for
24 around five months.

25 Q. So what, what period of time then did you

1 reside with him?

2 A. Around five months.

3 Q. Okay. But from what date to what date?

4 A. I told you. You can do the math. I turned, I
5 was 18.

6 Q. When were you 18?

7 A. Excuse me?

8 MR. EDWARDS: Object to the form.

9 BY MR. LUTTIER:

10 Q. When were you 18?

11 MR. EDWARDS: Object to the form.

12 THE WITNESS: I am 21 now.

13 BY MR. LUTTIER:

14 Q. My question is when were you 18?

15 A. When was I 18?

16 Q. Yeah.

17 A. Can you give me a piece of paper and a
18 pencil --

19 Q. Sure.

20 A. -- so I can find out --

21 Q. No problem.

22 A. -- when in the hell I was 18? How about if
23 you do the math?

24 Q. There you go, ma'am.

25 A. Can you do the math? Is it --

1 MR. EDWARDS: Object to the form. She will
2 give her date of birth, and it's a, it's a factual
3 issue as to when she turned 18.

4 BY MR. LUTTIER:

5 Q. You don't -- so, are you telling us here in
6 this deposition you don't know when you turned 18?

7 A. Sir, I was 18 when I met the man and I turned
8 19.

9 Q. And what's the date of your 18th birthday?

10 A. [REDACTED] I don't know of what year.

11 Q. [REDACTED] You don't know what year you
12 turned 18?

13 A. No, sir.

14 Q. When were you born?

15 A. [REDACTED]

16 Q. [REDACTED]

17 A. Yes.

18 Q. Okay.

19 A. I am not so wonderful with math if that's what
20 you're asking.

21 Q. So, when you turned 18, which if your numbers
22 are correct and if my math is correct, that's going to
23 put it at [REDACTED]

24 A. Okay.

25 Q. So, you moved in with him in [REDACTED] And

1 you said that you were with him when you turned, that is
2 living with him, when you turned 19?

3 A. Yes.

4 Q. So that means you were living with him in [REDACTED]
5 [REDACTED]?

6 A. [REDACTED].

7 Q. Yes?

8 A. Yes.

9 Q. And then when did you move out from him?

10 A. Okay. Actually I got with him in [REDACTED].

11 Q. Of what year?

12 A. I was 18.

13 Q. We established that was [REDACTED].

14 A. Okay.

15 Q. So if it was [REDACTED], that would make it [REDACTED]
16 [REDACTED], right?

17 A. I was 18 when I got with him. That was in
18 [REDACTED]. I don't know what year. I am not that good with
19 math. I'm sorry.

20 Q. Well, if you were [REDACTED], which
21 you've agreed you were, right?

22 A. Yes.

23 Q. And, and if you moved in with him in [REDACTED] of
24 the year when you were 18, the only [REDACTED] that could be
25 would be [REDACTED] isn't that right?

1 A. Sure.

2 Q. Okay.

3 A. If that's correct.

4 Q. So, it's your recollection as you sit here
5 today that you moved in with this gentleman in [REDACTED] of
6 [REDACTED] or that you started dating in [REDACTED]?

7 A. We started dating and I moved in with him
8 about two, a month later.

9 Q. Okay. And you lived with him for
10 approximately five months?

11 A. Yes.

12 Q. So that, that means you moved out in around
13 [REDACTED]?

14 A. [REDACTED]?

15 Q. I mean of [REDACTED]. I'm sorry. Right?

16 A. I moved out when I moved into the 7 -- or when
17 I moved into the [REDACTED], which was [REDACTED] or
18 which was, yeah, [REDACTED].

19 Q. Of [REDACTED]?

20 A. Yes.

21 Q. All right. So, that corrects you believe the
22 date that you moved out was [REDACTED] of [REDACTED], not [REDACTED]
23 of [REDACTED]; is that right?

24 A. I moved out sometime in [REDACTED].

25 Q. Did you live anyplace --

1 A. I moved, I moved with my, I stayed with my
2 father for a couple of weeks. Then I moved into the,
3 the address of [REDACTED].

4 Q. [REDACTED]?

5 A. Yes.

6 Q. Okay. And where does your dad or where did
7 your dad live at that time?

8 A. [REDACTED], [REDACTED],
9 [REDACTED].

10 Q. And did you move in with your dad for
11 approximately a two-month period between [REDACTED] of [REDACTED]
12 and [REDACTED] of [REDACTED]?

13 A. I moved in with him [REDACTED].

14 Q. Okay. Of [REDACTED]?

15 A. [REDACTED]. And then I moved into the [REDACTED] on
16 [REDACTED].

17 Q. And did your son move in with your dad with
18 you?

19 A. My son has always been with me since he was
20 born.

21 Q. Has there ever been any kind of judicial
22 proceeding or administrative proceeding brought to
23 change where your son lives? In other words, have you
24 ever -- do you know who [REDACTED] is?

25 A. Yes.

1 Q. Has there ever been any kind of [REDACTED] proceeding
2 that you have been involved?

3 A. Unfortunately, yes.

4 Q. Were you involved in that proceeding; that is
5 was the proceeding -- were you a party in that
6 proceeding?

7 A. I went through a [REDACTED] with a
8 previous boyfriend.

9 Q. Okay.

10 A. And that's how come [REDACTED] got involved.

11 Q. Was there a formal [REDACTED] investigation?

12 A. Yes.

13 Q. And do you remember what year that was?

14 A. '06.

15 Q. Okay. Now, I had asked you previously whether
16 you had any source of support from [REDACTED] [REDACTED]
17 forward. And you told me --

18 A. [REDACTED].

19 Q. -- that you lived with this boyfriend. But
20 now you have described the time that you have lived with
21 this boyfriend, and you're telling me that you moved out
22 with him in [REDACTED] of [REDACTED]. So apparently he wasn't
23 providing support to you in [REDACTED]?

24 A. No.

25 Q. Did he -- he didn't provide you support after

1 you quit living with him, did he?

2 A. Correct.

3 Q. Okay. All right. So let's go back to [REDACTED].
4 Starting [REDACTED].

5 A. Okay.

6 Q. What means of support did you have in [REDACTED]?

7 A. I worked at --

8 MR. LUTTIER: What, I mean --

9 MR. CRITTON: He can't do that.

10 MR. LUTTIER: Whoa, whoa, whoa. I don't think
11 you can sit over and start conferring with your
12 client when I am taking her deposition.

13 MR. EDWARDS: Okay.

14 MR. LUTTIER: I mean, if you've got a -- if
15 it's an attorney-client privilege issue --

16 MR. EDWARDS: That's why I was asking. It
17 doesn't appear there is. You can ask your
18 question.

19 MR. LUTTIER: Okay. What --

20 THE WITNESS: I worked --

21 MR. EDWARDS: The question is what she was
22 doing to make money?

23 BY MR. LUTTIER:

24 Q. What forms of support did you have or means of
25 support did you have in [REDACTED]?

1 A. I worked in [REDACTED].

2 Q. What kind of [REDACTED]?

3 A. In [REDACTED] kind of [REDACTED].

4 Q. What do you mean by [REDACTED] kinds of
5 [REDACTED]?

6 A. I worked as an escort.

7 Q. What do you mean by escort?

8 A. Wow, I worked as a call girl. I worked as an
9 escort. Do you not know what an escort is?

10 Q. Ma'am, I want to make sure we don't have a
11 definitional problem. So now you have said you worked
12 as a call girl and as an escort; is that correct?

13 A. Yes. It's the same thing.

14 MR. EDWARDS: Object to the form.

15 BY MR. LUTTIER:

16 Q. So, in your, in terms of this deposition, if
17 you refer to a call girl or an escort, those things mean
18 the same thing in your mind, correct?

19 A. It means the same thing in everybody's mind.

20 Q. Okay. Well, tell me what you did as a call
21 girl, escort in [REDACTED]?

22 A. I performed sexual, sexual things for men for
23 money.

24 Q. And what sort of sexual things did you perform
25 for men for money in [REDACTED]?

1 MR. EDWARDS: Don't answer. If we're going to
2 get into specific sexual issues, this is up on
3 appeal. Fourth District Court of Appeal just
4 issued a Rule to Show Cause directed towards
5 Mr. Epstein. Until that issue is resolved, she's
6 not going to answer specific sexual issues. She's
7 admitted to being a call girl. She will continue
8 to do so.

9 She's not going answer the names of the places
10 where she did it or any John's as we feel that
11 issue has not been covered. And until that is
12 resolved, we're instructing our client not to
13 answer. Additionally on those questions, we are
14 invoking her Fifth Amendment right to remain
15 silent, right of privacy as to [REDACTED], as well as the
16 right of privacy of third-party individuals.

17 MR. LUTTIER: Okay. Let me, just so we have a
18 clear record, I am going break those questions down
19 and then you can --

20 MR. EDWARDS: Sure.

21 MR. LUTTIER: -- assert your objection.

22 BY MR. LUTTIER:

23 Q. You said that you worked in [REDACTED]. What are
24 the names of the, what you referred to as [REDACTED] where
25 you worked?

1 MR. EDWARDS: Same objection. Don't answer.

2 MR. LUTTIER: What, what specifically is the
3 objection to that?

4 MR. EDWARDS: The objection is that this issue
5 is up on appeal. And the Fourth District Court of
6 Appeal has issued a Rule to Show Cause Order
7 directed towards Mr. Epstein. Until that issue is
8 resolved, we're not answering that question. The
9 basis of that issue is the privacy rights of [REDACTED],
10 the privacy rights of third parties as well as the
11 invocation of [REDACTED]'s Fifth Amendment right to
12 remain silent on this issue.

13 MR. CRITTON: Just so, and again let me just
14 insert here so the record is clear: You, in
15 essence, took up an issue associated with interrog,
16 a portion of Interrogatory 19 where you chose to
17 answer certain portions and not to answer other
18 portions. Portion dealt with, in essence, prior
19 time. And I will put it out if necessary.

20 The court has not issued, Judge Hafele didn't
21 preclude any type of questioning with regard to
22 income-related issues associated with where she
23 worked, what she did, how she made her money, how
24 much income she did make.

25 You have a claim for loss of earning, loss of

1 earning capacity here. None of that went up on
2 appeal nor did you object to that. You dealt
3 specifically with some aspects of prior sexual
4 history.

5 So I beg to differ. That's not part of what
6 the upcoming appeal is under the circumstances.
7 And I think it's inappropriate. Well, we'll let
8 the judge decide what is appropriate or not under
9 the circumstance.

10 MR. EDWARDS: She will testify to what money
11 she made, just not the names of the places and the
12 Johns. That's it. So I understand that we have a
13 disagreement. That's my position.

14 MR. GOLDBERGER: I need to clarify one thing.
15 Jack Goldberger on behalf of Mr Epstein.

16 You have raised three objections to that
17 question: Privacy, the issue that's on appeal and
18 the Fifth Amendment. Should your objections be
19 overruled on the right of privacy and on the issue
20 that's on appeal in the Fourth DCA, do you still
21 intend to invoke the Fifth Amendment privileges on
22 behalf of your client?

23 MR. EDWARDS: I'm sorry, what was the last
24 part?

25 MR. GOLDBERGER: Yes. Should your objections

1 be overruled, overruled on privacy issues and on
2 the issues that are before the Fourth District
3 Court of Appeal as to this question, you still
4 intend to invoke Fifth Amendment privileges on
5 behalf of your client?

6 MR. EDWARDS: I do. And under that point we
7 would concede that you are entitled to whatever
8 adverse inferences that you believe you are
9 entitled to under the case law.

10 MR. LUTTIER: In 2000 --

11 MR. CRITTON: Or, or, let me just -- or
12 whatever other relief is appropriate under the
13 circumstances.

14 MR. EDWARDS: Of course. Whatever the judge
15 decides.

16 BY MR. LUTTIER:

17 Q. In [REDACTED] were you working as a prostitute?

18 A. Yes.

19 Q. Have you ever worked -- or for what period of
20 time in [REDACTED] did you work as a prostitute?

21 A. What period of time?

22 Q. Yes. From [REDACTED] until when?

23 A. Until, well, [REDACTED] -- since [REDACTED] of [REDACTED].

24 MR. CRITTON: I'm sorry?

25

1 BY MR. LUTTIER:

2 Q. Until [REDACTED]? You said since, but did
3 you mean until?

4 A. I [REDACTED] stopped. Until [REDACTED].

5 Q. Okay. Is there a specific event that you can
6 recall as marking the point in time that you quit being
7 a prostitute?

8 A. Specific event?

9 Q. Yes.

10 A. [REDACTED]

11 Q. And what is it that you can recall that allows
12 you to state that that was the date in which you quit
13 being a prostitute?

14 A. I am sick of the lifestyle. That's what I can
15 recall.

16 Q. So, it wasn't a specific event. It was a
17 decision by you on [REDACTED] that you no longer
18 wished to be a prostitute; is that correct?

19 A. Correct.

20 Q. And during the period from [REDACTED] to
21 [REDACTED] of [REDACTED], was there anything that prevented you from
22 making the decision at any time during that period that
23 you wished to quit being a prostitute?

24 A. I don't understand what you are asking me.

25 Q. Was there anything between [REDACTED] and

1 [REDACTED] of [REDACTED] that prevented you from quitting being a
2 prostitute?

3 A. Didn't you just ask me the question, sir?

4 Q. No. Well, yeah, you said you didn't
5 understand it, so I asked it again.

6 A. I said I was sick of the lifestyle.

7 Q. From [REDACTED] to [REDACTED] of [REDACTED] is there
8 anything that prevented you from stopping being a
9 prostitute at any time during that period?

10 A. Well, I've been seeing [REDACTED] and kind
11 of realized that this life isn't for me. Can I have a
12 tissue?

13 Q. You were seeing a [REDACTED] between --

14 MR. EDWARDS: Let me just grab the witness a
15 tissue.

16 MR. LUTTIER: I am going to take a bathroom
17 break.

18 MR. EDWARDS: Okay.

19 THE VIDEOGRAPHER: Are we going off the
20 record?

21 MR. EDWARDS: Sure.

22 THE VIDEOGRAPHER: Going off the record. The
23 time is 10:41 a.m.

24 (A brief recess was held.)

25 THE VIDEOGRAPHER: We're back on the video

record. The time is approximately 10:52 a.m.

MR. EDWARDS: Okay. We had an issue come up where everybody that represents Mr. Epstein decided to chime in on a certain issue. And I know that that was an isolated incident. I am assuming that everybody realizes, you know, the rules here and you have chosen your examiner, and that's going to be the person speaking for Mr. Epstein, or on his behalf for the remainder of the deposition. We're not going to get double or triple teamed.

MR. CRITTON: I get -- let me speak to that.

MR. EDWARDS: Okay.

MR. CRITTON: You have got five lawyers, five to seven lawyers here on Plaintiffs on every deposition that I have attended. I have had five separate Plaintiff groups that all chime in on, on everything. We are not impacted in the deposition with your client at all, i.e., we're not chiming in to question her at all.

What we are is Mr. Goldberger has certain information that I am unaware of, so he deals, dealt only with the objection. It was a lawyer-to-lawyer issue. There are certain information that I have that Mr. Luttier does not have. So that's again a lawyer-to-lawyer issue

only on the record. It does not deal with -- only one lawyer is going to be asking questions. Only one lawyer will do any objections or comments with regard to [REDACTED]

MR. EDWARDS: Okay.

BY MR. LUTTIER:

Q. [REDACTED], the question I had asked you before we took the break was whether there was anything that prevented you from stopping your employment as a prostitute between [REDACTED] and [REDACTED] of [REDACTED].

A. I was sick of the lifestyle.

Q. Okay. And when did you become, to use your words, sick of the lifestyle?

A. I never liked the lifestyle but you can only endure so much pain for so long.

Q. And when you say pain, are you referring to physical pain or are you referring to mental pain?

A. Both.

Q. And when did you first become, to use your words, sick of the lifestyle?

A. Since I met Jeffrey.

Q. Which is when?

A. When I was 13 years old.

Q. Thirteen now. Is that what you said?

A. Yes, 13.

Q. And that would be when? What date?

A. 2002.

Q. And that's when you first became sick of what you have described as the lifestyle?

A. Yes.

Q. How long have you been a prostitute?

A. Well, ever since I was lured into Jeffrey's house.

Q. Which is when?

A. 2002 when I was 13.

MR. GOLDBERGER: Can we just stop for a second? We're having a technical issue upstairs.

Apparently we're, we're mooted. Can we do something about that? Thanks. I appreciate it.

MR. LUTTIER: Okay. What was the last question? I mean, what was the last answer?

(The requested portion of the record was read by the reporter.)

BY MR. LUTTIER:

Q. Now, if my math is correct, you said were you born [REDACTED]?

MR. EDWARDS: Object to the form.

MR. LUTTIER: And I haven't asked a question yet.

MR. EDWARDS: Well, that's not what the

witness said. That's not the date of her birth.

That's not the answer she gave. So, I am just correcting you to help you out.

BY MR. LUTTIER:

Q. Okay. What, what you did say your date of birth was, ma'am?

A. [REDACTED] --

MR. LUTTIER: I can't read my handwriting.

Stand corrected. [REDACTED] Thank you counselor.

BY MR. LUTTIER:

Q. [REDACTED] So according to my calculations, if my math is right, [REDACTED] of 2001 is when you would have turned 13, correct?

A. If that's, if that's right.

Q. And it was sometime in 2002 that you recall that you first met Jeffrey?

A. Yes.

Q. Now, prior to the first time you met Jeffrey, had you been a prostitute?

A. No.

Q. Did you do anything prior to the first time you met Jeffrey with respect to receiving money or anything of value in return for any type of sexual favor?

A. No.

Q. During this period from [REDACTED] to [REDACTED], or [REDACTED] until [REDACTED], when you were acting as an escort and you were doing sexual things for men for money, what types of acts did you perform on men?

MR. EDWARDS: Don't answer. This deals with Interrogatory No. 19. This is part of the appellate issue, instructing the client therefore not to answer this question until it's resolved by the Fourth District Court of Appeal as to whether she has to answer on specific sexual acts. So, she's not going to answer today.

MR. LUTTIER: Is that the sole basis of that objection or are you also incorporating your objection on the Fifth Amendment?

MR. EDWARDS: I am incorporating into that objection the Fifth Amendment argument as well as her right of privacy and the privacy rights of third parties.

BY MR. LUTTIER:

Q. How much money did you earn in [REDACTED] as a prostitute?

A. I couldn't count. A lot.

Q. What do you mean by "a lot"?

A. Do you want me to tell you how much money I made in that whole year?

Q. Yeah. I mean, I don't expect --

A. Not possible.

Q. -- you to know the exact dime, to the dime, but approximately how much did you make in [REDACTED]?

MR. EDWARDS: Object to the form.

If you know.

THE WITNESS: I don't know.

BY MR. LUTTIER:

Q. What did you mean when you said a lot?

A. I would make sometimes a thousand dollars a day; sometimes \$2,000 a day; sometimes \$300 a day; sometimes \$400 a day; maybe \$500 a day; maybe \$600 a day.

Q. And, and so what was -- when you said you made a lot in [REDACTED], what did you mean?

MR. EDWARDS: Same objection.

THE WITNESS: Sir, I don't know. Like I told you, I made \$200 a day once; 2, \$300 a day; \$400 a day; one grand maybe one day; maybe two grand the next day. I don't know.

BY MR. LUTTIER:

Q. And how were you paid?

A. Cash.

Q. Did you have hours that you worked in [REDACTED]?

A. Did I have hours that I worked? I was my own

self-contractor. I don't know how long that sexual need would need to be done. Sometimes it takes two minutes.

Q. Well, I mean did you work days, did you work nights. Did you work both? That's what I am trying to get.

A. Both.

Q. Would you typically work at night?

A. No.

Q. So, you were working during the day primarily?

A. Yes.

Q. As an escort?

A. Yeah.

Q. And did you keep any record of your earnings?

A. I have in the past.

Q. During what period?

A. In [REDACTED].

Q. And what record did you keep of your earnings in [REDACTED]?

A. A day-to-day record.

Q. What?

A. A day-to-day, daily record.

Q. Okay. Like a journal?

A. Yes.

Q. And what would you -- was this a book that you kept?

A. Yes.

Q. Is it like a -- describe the book. Is it a diary or something like that?

A. Yes.

Q. Okay. And do you still have this diary?

A. Yes.

Q. Okay. What do you call this diary?

A. A book.

Q. Is it -- does it have a name on it?

A. No.

Q. Describe the book.

A. It's red.

Q. It's got -- are there pages in it?

A. Actually it has a Bible verse on it.

Q. Are there pages in it?

A. Yes, there's pages in it.

Q. Are the pages blank?

MR. EDWARDS: Object to the form. Don't answer. Invoking her Fifth Amendment right to remain silent as to what is in this book.

BY MR. LUTTIER:

Q. My question is are the pages blank? In other words are they pages of blank paper or are they lined pages?

A. They are lined.

1 Q. Is it -- does it have a name on it like diary
2 on it?
3 A. It has a Bible verse on it.
4 Q. On the cover of it?
5 A. Yes.
6 Q. Okay. And, and you kept this book for what
7 period of time?
8 A. I have kept it in [REDACTED] when I was working, and
9 I think I recorded my income for a year.
10 Q. From [REDACTED] and [REDACTED]
11 A. [REDACTED] to [REDACTED]
12 Q. Those complete calendar years?
13 A. Yes.
14 Q. Had you ever kept a record of your income for
15 any prior year; that is any year before [REDACTED]
16 A. I have some record of a couple of months but
17 not as much as the whole year.
18 Q. Couple of months of what year?
19 A. [REDACTED]
20 Q. Are all of those records in the same book or
21 are they in different books?
22 A. Different books with lined paper.
23 Q. And what information did you record in these
24 books?
25 MR. EDWARDS: Don't answer. Invoking her

1 Fifth Amendment right to remain silent as to the
2 language that is in these various books.
3 MR. LUTTIER: Before --
4 MR. EDWARDS: -- outside the fact that she's
5 admitted to keeping a tally of the money made.
6 BY MR. LUTTIER:
7 Q. Before we get to the, exactly what the books
8 said, I want to ask you about what information is
9 contained there. Does this --
10 A. My income. We're talking about my income.
11 Q. So this --
12 A. That's what's contained in the book.
13 Q. This book contains dollar figures?
14 A. Yes. My income, dollar figures.
15 Q. Does it contain -- all right. Does it reflect
16 the date on which you received certain dollars?
17 MR. EDWARDS: Objection. Don't answer.
18 Invoking her Fifth Amendment right as to that
19 question.
20 BY MR. LUTTIER:
21 Q. Does it reflect, does the book reflect any
22 other information whatsoever other than dollar figures?
23 MR. EDWARDS: Don't answer. Invoking her
24 Fifth Amendment right as to that question as well.
25

1 BY MR. LUTTIER:
2 Q. Did you keep in this book the names of any
3 individuals?
4 A. No.
5 Q. For what purpose did you keep this book? Or I
6 shouldn't say this book. These books because you, you
7 have testified there is more than one, correct?
8 MR. EDWARDS: Object to the form. Don't
9 answer this question. She is invoking her Fifth
10 Amendment right onto that as well.
11 MR. LUTTIER: The question for what purpose
12 did you keep these books?
13 MR. EDWARDS: Correct. That's something that
14 should she provide an answer could provide a link
15 in the chain.
16 BY MR. LUTTIER:
17 Q. Where are these -- how many of these books are
18 there?
19 A. Two or three.
20 Q. And where are they currently located?
21 MR. EDWARDS: Object to the form. Don't
22 answer. Invoking her Fifth Amendment right as to
23 the location.
24 MR. LUTTIER: How is the location going to
25 violate the Fifth Amendment?

1 MR. EDWARDS: I stated my objection.
2 BY MR. LUTTIER:
3 Q. Have you shown these books to anyone?
4 A. No, sir.
5 Q. No one at all?
6 MR. EDWARDS: Object to the form, asked and
7 answered.
8 THE WITNESS: No, sir.
9 BY MR. LUTTIER:
10 Q. Did you utilize the information that was
11 contained in these books for any reason?
12 A. No, sir. My own personal knowledge.
13 MR. GOLDBERGER: Can we just go off the record
14 for one second.
15 MR. LUTTIER: Sure.
16 THE VIDEOGRAPHER: Going off the video record.
17 The time is 11:05 a.m.
18 (A discussion was held off the record.)
19 THE VIDEOGRAPHER: We're back on the record.
20 The time is 11:05.
21 BY MR. LUTTIER:
22 Q. I just want to clarify something. During this
23 deposition from the beginning of it until now your
24 counsel has invoked your right to the Fifth, privileges
25 afforded you under the Fifth Amendment.

1 Are you incorporating that right? Are you
2 asserting that right to the Fifth Amendment?

3 A. Am I allowing him to --

4 Q. Well, your lawyer said it. But are you, are
5 you incorporating his invocation of your Fifth Amendment
6 right?

7 A. Am I allowing him to say it?

8 Q. Yes.

9 A. Yes.

10 Q. So, it's your desire, you are invoking that
11 Fifth Amendment right, correct?

12 A. Yes, I am.

13 MR. EDWARDS: Just read it whenever he says
14 it.

15 MR. LUTTIER: This might be lawyer technical
16 stuff, but I believe if you're going to invoke that
17 right, you have to assert the right so --

18 THE WITNESS: On advice of counsel --

19 BY MR. LUTTIER:

20 Q. Hold on. Let me ask a question. As to those
21 questions that you were previously asked during this
22 deposition wherein your counsel invoked your Fifth
23 Amendment right, do you intend to invoke that right as
24 well?

25 A. On advice of counsel, I invoke my Fifth

1 Amendment rights under the United States Constitution.

2 Q. As to each question that's been asked of you
3 thus far where your counsel invoked those rights?

4 A. Yes, sir.

5 Q. Now, when we took a break during this
6 deposition a few minutes ago, when you came back in the
7 room, did I hear you say that you wanted to have
8 Mr. Epstein in the room?

9 A. I really don't care.

10 Q. So you have no fear of Mr. Epstein being at
11 the deposition; is that correct?

12 A. Being here --

13 Q. Right.

14 A. -- I don't have fear of him. I would actually
15 love for him to see what he put me through if he cares.

16 Q. Did you know you took the position in court
17 that you didn't want him present and that you, you were
18 fearful of having him in the room?

19 A. Yes.

20 Q. When did that fear disappear?

21 A. As of about right now when you are stirring up
22 all these emotions in me, I would love to look him right
23 in the face.

24 Q. Okay.

25 A. And to tell him how sick he is and how you

1 are, and how he is, and how he is.

2 Q. When you say how I am and my co-counsels here,
3 what do you mean by that?

4 A. I mean that if you say you have children and
5 you are sticking up for this sick man, and it's not just
6 me talking, but it's so many other little girls that are
7 talking, you're sick.

8 Q. And are you referring to your past actions
9 with Mr. Epstein?

10 A. Yeah.

11 Q. And, and you believe that whatever your
12 interaction was with Mr. Epstein, that was wrong; is
13 that right?

14 A. Excuse me?

15 Q. You believe whatever your interaction with
16 Mr. Epstein was in the past, that it was wrong?

17 A. I think for a 50-year-old man to take over,
18 over 100 girls and the little girls that I brought that
19 were from the ages of 12, to have them see, to have him
20 see different vaginas without hairs on it when he is 50
21 years old, to masturbate and to get off like that, I
22 think it's pretty sick in the head.

23 And for you guys to be defending him, that's
24 pretty sick. I don't know if you guys have any
25 daughters, but would you want your daughter at Jeffrey

1 Epstein's house while he is massaging and touching her,
2 her vagina? Would you like that?

3 Q. How long have you been of this opinion?

4 A. Of this opinion, I think everybody has an
5 opinion like that.

6 Q. How long have you held the beliefs that you
7 just expressed?

8 A. How long have I held the beliefs?

9 Q. That's right, ma'am.

10 A. Probably when I had my son and I realized,
11 wow, I have a little boy; if anybody was to touch him
12 and screw up his mind like they screwed up mine and hurt
13 me --

14 Q. So, it was the birth of your son that was the
15 event that caused you to realize all these things?

16 A. Maybe that made me wake up a little more.

17 Q. Prior to that --

18 A. But I knew that it was wrong at the beginning.

19 Q. When did you know it was wrong?

20 A. I knew it was wrong the first second I stepped
21 into his house.

22 Q. Do you know what a pimp is?

23 A. Yeah, I know what a pimp is.

24 Q. What is a pimp?

25 A. A pimp to me is a man who sends out women to

1 do sexual acts and bring back the money to the pimp.

2 Q. Have you ever had a relationship with a pimp?

3 A. No, sir.

4 Q. Have you ever acted as a pimp?

5 A. If you want to say when I was, you know, under
6 the age of 18 bringing girls to Jeffrey Epstein, sure.
7 You can call me Jeffrey's pimp.

8 Q. And what do you mean by that?

9 A. You don't understand?

10 Q. No. I want to know what you mean, ma'am.
11 What I understand doesn't really matter.

12 A. I just gave you the definition of a pimp.

13 Okay.

14 Q. Were you -- so, so, you were bringing girls to
15 Mr. Epstein --

16 A. Yeah.

17 Q. -- at some point, correct?

18 A. Yeah.

19 Q. You knew that the girls were going to come to
20 perform massages on Mr. Epstein when you brought them;
21 is that correct?

22 A. Oh, yeah, and more. Not just massages.

23 Q. And did, and did you get paid money to do
24 that?

25 A. Yeah.

1 Q. And did you share that money with anybody?

2 A. Did I share that money with anybody?

3 Q. Uh-huh.

4 A. No. Why would I share my money with somebody?

5 Q. Just asking if you shared it with anybody.

6 A. No.

7 Q. Now, you indicated previously that you had
8 been seeing, I think to use your words [REDACTED]. Do you
9 recall that testimony?

10 A. I never said [REDACTED]. I said I saw a

11 [REDACTED].
12 Q. [REDACTED]. When is the first time in your
13 life you ever saw a [REDACTED]?

14 A. That I recall, after the Jeffrey Epstein,
15 after seeing Jeffrey Epstein and I saw [REDACTED]
16 because of him.

17 Q. My question is when was the first time?

18 A. I don't know when the first time was.

19 Q. When did you last see Jeffrey Epstein?

20 A. When did I last see Jeffrey Epstein? I think
21 I was about to turn -- no, when I was at the end of 16
22 or the beginning of 17.

23 MR. EDWARDS: Just so it's clear, you, when
24 you're asking the question when was the last time
25 saw him, do you mean physically saw him or was

1 going over to his house because the answers may be
2 different. I am not sure.

3 BY MR. LUTTIER:

4 Q. Well, let's -- let me clarify. When was the
5 last time you went to Mr. Epstein's house?

6 A. At the beginning of -- I went there when I was
7 16 [REDACTED] And I went there again after I had my
8 [REDACTED] So, it was after, it was either at the end of when
9 I was 16 or at the beginning when I was 17.

10 Q. You [REDACTED] age 16?

11 A. Yes, I was.

12 Q. [REDACTED]

13 [REDACTED]

14 A. Thank God.

15 Q. You never had sexual intercourse with
16 Mr. Epstein, did you?

17 A. Penis inserted into a vagina, no.

18 Q. Did he ever insert his penis into your mouth?

19 A. No.

20 Q. Did ever insert his penis into your anus?

21 A. No.

22 Q. Did every insert his penis into your vagina?

23 A. No.

24 Q. Did he ever insert his penis anywhere in your
25 body?

1 A. No, but he would bring my hand closer to his
2 penis.

3 Q. What do you mean by he would bring his (sic)
4 hand closer to his penis?

5 A. Do you want me to show you? Here is my hand.
6 I am Jeffrey. Here is my penis. Come closer, like
7 that.

8 Q. Did you ever hold his penis in your hand?

9 A. No.

10 Q. Did you ever perform any sexual act on Jeffrey
11 Epstein?

12 A. Yeah.

13 Q. What act did you perform on Jeffrey Epstein?

14 A. Well, I would go there multiple times.
15 50-year-old man would be sitting on the couch talking on
16 the phone. I would sit there naked with my legs wide
17 open. But what really sickens me is that if this was
18 any Joe Schmo on the road who didn't have any money, he
19 would be in jail for a long time or he would be shot.
20 But he is not, right. He is the multi billionaire so he
21 is allowed. He is probably fucking jacking off right
22 now. I am sorry. I am 21. You can't jack-off to me,
23 but you know --

24 MR. LUTTIER: Move to strike the soliloquy as
25 not being responsive to the question.

THE WITNESS: What did I do to Jeffrey and what did Jeffrey do to me? I went up there multiple times. I can't count. And I would be on a massage table massaging his legs. He would turn over. His penis would be hanging out. He would put a vagina or a vibrator to my vagina. He would touch my vagina with his fingers. He would touch my breasts. He would try to kiss my mouth. He would bring my hands towards his penis. He would ask the little girls that I was with, hey, can I just see your vagina, can I just see it, even if they would say no. Can I, oh, I know, but let me just see it. Let me just see it. Sick mother fucker.

I would like him in this room.

BY MR. LUTTIER:

Q. Any sexual act that you performed with Jeff?

A. Is that not a sexual act when you put a vibrator to your wife's pussy; is that not a sexual act?

Q. Any act that you performed with Mr. Epstein that you haven't described thus far?

A. Let me see. I went there multiple times. There was multiple things that I have done with Jeffrey and Jeffrey has done with me.

Q. My question stands. Did you perform any act

with Mr. Epstein other than what you have described thus far?

A. Besides standing there with my legs wide open and his little fetish with me pinching his nipples -- he is probably getting hard right now -- with my little 12-year-old girlfriend standing next to me, both naked, no, I can't think of any other sexual acts I have done with Jeffrey.

Q. And, and did you say that you went there multiple times?

A. Yeah.

Q. How many times would you say you went?

A. More than, more than 50 times.

Q. Did you keep a record of the number of times you went?

A. Unfortunately I didn't.

Q. And were there occasions when you contacted either Mr. Epstein or people on his behalf asking that you be allowed to come over?

A. They would call me most of the time, but, yes, there was multiple times I would call them.

Q. And for, and who did you call?

A. I called the house phone, [REDACTED] I don't know. There was multiple house numbers. I would talk to [REDACTED] I would talk to the one --

Q. You said --

A. Talked to the one guy that escorted me from his house to my [REDACTED]. I would talk to [REDACTED]. I would talk to many of the girls that were just wandering around his house.

Q. So you say, you gave us a phone number that you say you called, right?

A. I am not positive if that was his phone number. I know that a lot of his phone numbers started with [REDACTED].

Q. You mentioned [REDACTED] and some other people. Did you ever call Mr. Epstein directly?

A. Yeah.

Q. Did you ever have a conversation with him?

A. Yes.

Q. And when did that happen?

A. From the time that I went there to the time that I stopped going there. I always talked to Jeffrey on the phone.

Q. You always, what do you mean by "always." I thought you said you talked to [REDACTED].

A. I would always talk to Jeffrey on the phone. I would talk to Jeffrey. I would talk to [REDACTED]. I would talk to [REDACTED], whoever answered the phone. And then sometimes Jeffrey wanted to get on the phone

because he wanted to tell me what kind of specific girl he wanted that day or tomorrow or the next day. Frequently I would talk to Jeffrey Epstein on the phone.

Q. You used the word "always." If I am understanding correctly, you are saying you were calling and you were talking to different people on different occasions; is that right?

A. Yeah.

Q. Okay. And do you have any record of your conversations or the number of times you called and claimed that you talked to Mr. Epstein?

A. Do I personally have a record?

Q. Yeah.

A. No, but you can talk to [REDACTED] about that and Jeffrey. Jeffrey has a record.

Q. So, you don't have it?

A. Unfortunately, no.

Q. Now, on these multiple times, how many times would you say you called, initiated a call asking [REDACTED] or someone else if you could come over to Mr. Epstein?

A. Well, when I first started going there he called and he would call and call and call and call. And he told me from that point, he said, listen, you call me when you find somebody. If I didn't have somebody new, then he didn't want me calling. If I

1 found a new girl, he wanted me calling right away.

2 Right way. I would go there two times a day.

3 Can I have a water, please?

4 MR. LUTTIER: Sure. I don't see any up there.

5 MR. EDWARDS: Let's take a brief break until I
6 find a water and we'll come back on.

7 MR. GOLDBERGER: There is a cooler over there.

8 MR. EDWARDS: It may be in the cooler but I
9 don't see --

10 THE COURT REPORTER: I can go upstairs. It
11 will take me a couple of minutes.

12 THE VIDEOGRAPHER: Are we going off the
13 record?

14 MR. EDWARDS: Yes.

15 THE VIDEOGRAPHER: Going off the video record.
16 The time is 11:01.

17 (A brief recess was held.)

18 THE VIDEOGRAPHER: We're back on the video
19 record. The time is 11:33 a.m.

20 BY MR. LUTTIER:

21 Q. In your, in one of your prior answers you said
22 something about a 12 year old being present with you.
23 Do you recall that testimony?

24 A. Yes.

25 Q. Who are you referring to?

1 A. There is multiple ones. I do know one. Her
2 name is [REDACTED].

3 Q. [REDACTED] what?

4 A. [REDACTED] I'm not -- I don't know the spelling is.

5 Q. Is it [REDACTED]?

6 A. (Witness spelled name maybe.)

7 Q. And how do you -- did you know [REDACTED]?

8 A. Yes.

9 Q. How did you know her?

10 A. School.

11 Q. What school?

12 A. [REDACTED].

13 Q. She was a student at [REDACTED]?

14 A. Yes.

15 Q. And when did you first make her acquaintance?

16 A. When I started going to school at [REDACTED]

17 [REDACTED].

18 Q. When did you start going to school at [REDACTED]

19 [REDACTED]?

20 A. For the record, I am really bad with math and
21 years. So, the first year that [REDACTED]
22 opened up was the first year that I went.

23 Q. And what year of school were you in when you
24 first went to [REDACTED]?

25 A. Like I said, I'm not good with years.

1 Q. Well, were you a [REDACTED] in high school --

2 A. No.

3 Q. -- when you first went to [REDACTED]?

4 A. No.

5 Q. Were you a [REDACTED] in [REDACTED] school when you
6 first went to [REDACTED]?

7 A. No.

8 Q. Were you a [REDACTED] in [REDACTED] school when you
9 first went to [REDACTED]?

10 A. Might have been.

11 Q. That would be the [REDACTED] grade?

12 A. Might have been.

13 Q. Did you attend any high school before you went
14 to [REDACTED]?

15 A. Yes.

16 Q. What high school did you attend?

17 A. I have attended [REDACTED].

18 Q. The question is what high school did you
19 attend?

20 A. I am trying to think, sir. I have attended

21 [REDACTED].

22 Q. What year?

23 A. I don't know.

24 Q. When I say what year I mean as a freshman or
25 as a sophomore or junior or senior?

1 A. [REDACTED] maybe.

2 Q. So as a [REDACTED]?

3 A. Maybe.

4 Q. Well, if wasn't the [REDACTED], it would have
5 been the 10th, 11th, or 12th grades, right?

6 A. Yes, sir. Probably [REDACTED] from what I
7 recall.

8 Q. You are talking about the [REDACTED]
9 located in [REDACTED]; is that correct?

10 A. Yes.

11 Q. And it only begins in the [REDACTED], right?

12 A. Yes. So probably [REDACTED].

13 Q. Did you attend [REDACTED]
14 for your entire [REDACTED] or [REDACTED] year?

15 A. I don't think I did, sir. I think I
16 transferred to [REDACTED] and after that I
17 transferred to [REDACTED].

18 Q. Well, let's stay on [REDACTED] And
19 Why did you attend [REDACTED] by that I mean --

20 A. My mother lived in [REDACTED].

21 Q. Okay. Where did your mom live?

22 A. My mother lived in [REDACTED].

23 Q. In a development like [REDACTED]?

24 A. In [REDACTED].

1 Q. And were you living with her at the time?
 2 A. At the time I was.
 3 Q. Was there anyone else living with you and your
 4 mother?

5 A. My sister.

6 Q. And your sister's name is?

7 THE WITNESS: Do I have to give my sister's
 8 name? I would really rather not give you my
 9 sister's name.

10 BY MR. LUTTIER:

11 Q. Would that be [REDACTED]?

12 A. I would rather not give you my sister's name.

13 Q. Is your sister's name [REDACTED]?

14 A. I would rather not give you my sister's name.

15 Q. This is a yes or no, ma'am. This is not
 16 complicated. Is your sister's name [REDACTED]?

17 MR. EDWARDS: Object to the form. Asked and
 18 answered. The objection is a right of privacy of
 19 third parties. She's not going to give the name.

20 MR. LUTTIER: Are you instructing the witness
 21 not to answer --

22 MR. EDWARDS: Yes.

23 MR. LUTTIER: -- the question of whether your
 24 sister's name is [REDACTED]?

25 MR. EDWARDS: Correct.

1 MR. LUTTIER: Are you serious?

2 MR. EDWARDS: Yeah.

3 MR. LUTTIER: Okay. I am going to guess your
 4 sister's name is [REDACTED].

5 THE WITNESS: You can guess that.

6 BY MR. LUTTIER:

7 Q. Okay. So, it was you and [REDACTED] and your mom
 8 living at [REDACTED]?

9 MR. EDWARDS: Object to the form.

10 THE WITNESS: No. It was my mother, my
 11 sister, and I living --

12 BY MR. LUTTIER:

13 Q. And is that different than the people I just
 14 said?

15 MR. EDWARDS: Object to the form.

16 THE WITNESS: It was my mother, my sister, and
 17 I living in [REDACTED] --

18 BY MR. LUTTIER:

19 Q. And for what period --

20 A. -- [REDACTED].

21 Q. -- of time did you and your mother and you
 22 sister live in [REDACTED]?

23 A. I was living with my mother when I was in
 24 eighth grade. And when I was in [REDACTED]
 25 [REDACTED], and pretty much the beginning of [REDACTED].

1 Q. You said the beginning of [REDACTED]

2 A. Yes. And that's when I transferred to [REDACTED]

3 [REDACTED]
 4 Q. What's your mother's name?

5 A. [REDACTED].

6 Q. What is her last name?

7 A. [REDACTED]

8 Q. Did you live with someone other than your
 9 mother before the [REDACTED]?

10 A. My father.

11 Q. Where did you live with him?

12 A. [REDACTED]

13 Q. For the entire time that you were in the
 14 [REDACTED] and you were living
 15 with your mother in [REDACTED], was your [REDACTED] also living
 16 with you?

17 A. Yes.

18 Q. And do you know how old you were in the ninth
 19 grade?

20 A. No.

21 Q. Where did you go to seventh and eighth grade?

22 A. [REDACTED]

23 Q. And did you -- when you were in the [REDACTED]
 24 [REDACTED] living with your mother, was she
 25 always living in [REDACTED]?

1 A. Sir, I was in and out of my mother's and
 2 [REDACTED] house when I was in [REDACTED]
 3 so --

4 Q. What do you mean in and out --

5 A. I don't want you to think that I was with my
 6 mother for the full time when I was in [REDACTED]
 7 [REDACTED]. I was in and out of my mother and
 8 [REDACTED] house when I was in [REDACTED]
 9 They were separated. My father lived in [REDACTED]
 10 [REDACTED]. My mother lived in [REDACTED]. I went
 11 to several schools in [REDACTED]. I went to
 12 several schools in [REDACTED].

13 Q. Well, you told me about [REDACTED]

14 Now you told me about [REDACTED] and [REDACTED]
 15 What other schools did you attend?

16 A. [REDACTED] is middle school. [REDACTED]

17 I went there for [REDACTED]. I attended
 18 [REDACTED] when I was supposed to be, when I
 19 was in [REDACTED].

20 Q. Now, when you say you were in and out of your
 21 mother and father's house, what do you mean?

22 A. I lived with my mother for a little while.

23 And then I would go to my father's house for a little
 24 while. You know, they were separated, so, I -- there
 25 was never a court ordered statement saying that I had to

1 be anywhere specific.

2 Q. Well, when you say they were separated, were
3 they separated or were they divorced?

4 A. They were, they were divorced when I was

5 [REDACTED]
6 Q. And so [REDACTED], that would have been about what,
7 [REDACTED]?

8 A. Sure.

9 Q. And why were you moving back and forth between
10 your mother and father's house as late as the [REDACTED]

11 [REDACTED]
12 A. Because they actually, they, they allowed it
13 to be my choice. You know, they allowed it to be my
14 choice. They -- it wasn't a big deal. If I wanted to
15 go live with my mother, I lived with my mother. If I
16 wanted to live with my father, I lived with my father.

17 Q. And did you move all your belongings from one
18 house to the other?

19 A. I had some of my stuff over at my mother's
20 house and some things at my father's house as well.

21 Q. Did you have any conflict with your mother
22 during this period of time, [REDACTED]
23 [REDACTED] when you say you were living with her?

24 A. Yes.

25 Q. What was the conflict with your mother?

1 A. Well, after I met Jeffrey, I started getting
2 into bad, just drugs, and they kept on escalating and
3 escalating, and that's what happened.

4 Q. What do you mean when you say after you met
5 Jeffrey, you got into drugs?

6 A. After I had met Jeffrey, I started doing more
7 and more and more drugs.

8 Q. When did you -- I assume you mean illegal
9 drugs or drugs for which you didn't have a prescription?

10 A. Correct.

11 Q. What drugs did you do?

12 A. Any drugs I could get, coke, pain killers. I
13 have done many drugs, ecstasy and --

14 Q. Xanax?

15 A. And Xanax.

16 Q. Is that one of your drugs of choice, Xanax?

17 A. What do you mean?

18 Q. Is that one of your drugs of choice, a popular
19 drug for you?

20 A. When I was that age, yeah. Any drug --

21 Q. That age meaning what age?

22 A. When I was seventh and eighth and ninth. Not
23 when I was in seventh. More when I was in eighth and
24 ninth. I don't know the exact -- when I was in school.
25 I know that when I met Jeffrey, the drugs I got, I was

1 more interested into getting into drugs.

2 Q. Well, you, you had done drugs prior to the
3 time you met Jeffrey, correct?

4 A. I smoked weed a few times, and that was pretty
5 much it. And when I met Jeffrey, the girls that,
6 [REDACTED] who brought me there, she would start giving me
7 drugs.

8 Q. What kind of drugs?

9 A. Pills, any kind of pills.

10 Q. What kind of pills?

11 A. Any kind, Valiums, Percocets, Lorcets, any
12 kind of pills to make you I guess chill and to not be
13 nervous in front of a 50-year-old [REDACTED]

14 Q. Well, who is this [REDACTED] that you're
15 referring to? What's her last name?

16 A. I don't know.

17 Q. You have no recollection who this is?

18 A. No, sir.

19 Q. And this is a person that you said did what?
20 What was your relationship?

21 A. She brought me to Jeffrey's first time.

22 Q. How did you know this person?

23 A. I was at a house and I am not exactly -- I was
24 at one of my friend's house. And I spent the night over
25 there. And I guess [REDACTED] was one of my friend's

1 friend. And she asked me if I wanted to make \$200. And
2 at first I was very, very skeptical about it because of
3 the way she explained it to me. But then she convinced
4 me into it.

5 And once I walked into that beautiful house
6 and that beautiful mansion with all those beautiful
7 girls and luxurious living with all those beautiful
8 cars, I thought at that age that that's what I wanted or
9 that's what I could have made of myself.

10 Q. So, it was this person named [REDACTED] that you
11 say convinced you to go to Jeffrey Epstein the first
12 time, is that -- do I have your testimony correct on
13 that?

14 A. Yes, you do.

15 Q. Jeffrey Epstein had no contact with you until
16 [REDACTED], whatever her last name is, brought you to his
17 house; is that correct?

18 A. That's correct.

19 Q. And you met [REDACTED] at, you say at a friend's
20 house. What was that friend's name?

21 A. I am pretty sure it was [REDACTED] house.

22 Q. [REDACTED] who?

23 A. I, I don't know his last name.

24 Q. You were spending the night at this person's
25 house?

1 A. Uh-huh.

2 THE COURT REPORTER: Is that a yes?

3 THE WITNESS: Yes.

4 BY MR. LUTTIER:

5 Q. So, was [REDACTED] a boyfriend of yours?

6 A. No. [REDACTED], we had, we had friends. We had
7 mutual friends that we would just hang out with. [REDACTED]
8 and a couple of my girlfriends, and we all spent the
9 night over there just hanging out.

10 Q. Well, how old was [REDACTED] --

11 A. Oh, I'm not, I'm not sure.

12 Q. -- at the time that you were spending the
13 night at his house?

14 A. Maybe -- he was young as well. He was maybe

15 16. It was his parents' house.

16 Q. Okay. So his parents were present when you at
17 this age were spending the night over at his house?

18 A. Yes, they were. Yeah, his parents were there.

19 Q. And they were there?

20 A. Yes.

21 Q. Okay. And who were these other -- you said we
22 had mutual friends. Who is the "we" you were referring
23 to?

24 A. Well, he introduced me to [REDACTED]. [REDACTED] was
25 one of my girlfriends, [REDACTED], and a couple of her friends,

1 but mainly my girlfriend was [REDACTED].

2 Q. Well, who were these couple of her friends
3 that you are referring to?

4 A. A couple of girlfriends. I don't recall their
5 names.

6 Q. You don't know their first name or last name?

7 A. No.

8 Q. No idea?

9 A. No.

10 Q. But all of you spent the night over at this

11 [REDACTED] --

12 A. Yeah, but that was years ago, so I really
13 don't remember. I don't hang out with them anymore. I
14 don't remember.

15 Q. You don't hang out with who, [REDACTED] anymore?

16 A. No, I don't hang out with any of them anymore.

17 Q. You don't. When was the last time you saw
18 this [REDACTED] that you've referred to?

19 A. I actually passed by her New Year's Eve.

20 Q. Of what year?

21 A. Of [REDACTED]. New Year's Eve at [REDACTED] downtown.
22 I passed by her. I just -- we just said hi. We didn't
23 hang out. We just said hi and talked a little bit, but
24 nothing much, like, hey, how are you, how's your [REDACTED].

25 Q. Is the first time that you met this [REDACTED]

1 the night that you spent, the night at [REDACTED]'s house?

2 A. I, I saw her before because [REDACTED] would hang
3 out with her, but we didn't really talk. She was a nice
4 girl, but she was one of [REDACTED]'s friends that had
5 introduced me to her.

6 Q. Who introduced you to who?

7 A. [REDACTED] introduced me to [REDACTED].

8 Q. At this evening when you spent the night at
9 [REDACTED] or before that?

10 A. No. A couple of days before that.

11 Q. What was your relationship with [REDACTED]?

12 A. We were good friends from the neighborhood
13 that we grew up in.

14 Q. Which neighborhood is that?

15 A. I grew up in [REDACTED]. She grew up across
16 the, across from the neighborhood I grew up in. Near
17 [REDACTED]. [REDACTED] I want to say.

18 Q. When you say [REDACTED], are you referring to
19 the City of [REDACTED]?

20 A. No, [REDACTED].

21 Q. Okay. Where is [REDACTED]?

22 A. [REDACTED] is on [REDACTED].

23 Q. [REDACTED]?

24 A. [REDACTED].

25 Q. Okay. So, that [REDACTED], is that a, a

1 development out there?

2 A. That's a [REDACTED] park.

3 Q. You grew up in [REDACTED] known as

4 [REDACTED].

5 A. Yes.

6 Q. [REDACTED] grew up across the street from

7 [REDACTED] in another development?

8 A. Yes.

9 Q. Did it have a name?

10 A. Not that I recall. The road was called

11 [REDACTED], I am pretty sure.

12 Q. And you knew [REDACTED] for how long, ever since you
13 were a kid?

14 A. Yes. I probably met her when I was 11, and we
15 just were little girls riding bikes and playing.

16 Q. Do you have any recollection of when you, this
17 evening that you spent the night at [REDACTED] house was?

18 A. Well, from what I, from what I remember, I am
19 pretty sure I was -- I was 13 years old and, yeah.

20 Q. And you were going --

21 A. I was 13 right about to turn 14.

22 Q. And you were going to what school? So it had
23 to be [REDACTED]?

24 A. I'm not sure. I couldn't tell you.

25 Q. And [REDACTED] lived where?

1 A. He lived in [REDACTED] somewhere. He had a
2 car. We didn't have a car. I don't know where he
3 lived.

4 Q. Did [REDACTED] drive?

5 A. Yes.

6 Q. So [REDACTED] must have been old enough to have a
7 license?

8 A. Yes. I told you he was around 16 years old.

9 Q. And was this -- when you say [REDACTED], are
10 you talking about down somewhere near where you lived?

11 A. Yeah, it was around that area, the heart of
12 [REDACTED].

13 Q. So, were you going to school somewhere down in
14 the center of [REDACTED] or someplace up in, in [REDACTED]
15 [REDACTED]?

16 A. You know what, it could have been around
17 summertime when we didn't have school, and I was
18 probably at my father's house at summertime.

19 Q. Now, at that point in time, at the time that
20 you went and spent the night at [REDACTED] house, what
21 drugs had you experimented with?

22 A. I have experimented with weed a couple of
23 times, but I personally didn't care for it.

24 Q. What other drugs?

25 MR. EDWARDS: Are you talking about at the

1 time when --

2 MR. LUTTIER: Yeah, when you -- this, as of
3 the, the point in time that I am fixing on is
4 whenever this incident was when you spent the night
5 at [REDACTED] house.

6 THE WITNESS: No. We weren't doing any drugs.
7 BY MR. LUTTIER:

8 Q. I am not saying you were doing drugs at the
9 time. I want to know what drugs you had experimented
10 with --

11 A. Weed.

12 Q. -- before that point in time.

13 A. Marijuana.

14 Q. Had you ever taken any other illegal or
15 non-prescription drug as of the time that you spent the
16 night at [REDACTED] house and first met this [REDACTED] lady?

17 A. No.

18 Q. Are you sure?

19 A. Yes.

20 Q. Okay. I want, I want to clarify now. You've
21 indicated in this deposition that sometimes you can't
22 remember dates, right?

23 A. (Witness nods head.)

24 Q. So --

25 A. Yes.

1 MR. EDWARDS: Has to be yes or no so the
2 record is clear.

3 BY MR. LUTTIER:

4 Q. So my question is designed to be very
5 specific. So, if you can't recall, I want you to tell
6 me. If you definitely can recall then fine, give me
7 whatever answer. But I want to ask you again, as of the
8 point in time that you spent the night at [REDACTED] house,
9 other than marijuana had you used any other drug that
10 was a non-prescription drug?

11 A. No.

12 Q. Had you told anyone in the world as of that
13 point in time that you had used a drug?

14 A. Maybe to be cool I would have said, oh, yeah,
15 I tried that before, but no.

16 Q. Were there any girlfriends that you knew, any
17 at all with whom you had done any illegal
18 non-prescription drug as of the date that you spent the
19 night at [REDACTED] house?

20 A. No.

21 Q. And you're absolutely sure of that, correct?

22 A. Yes.

23 Q. All right.

24 A. Do you want to ask me again?

25 Q. Now, when was the first time that this [REDACTED]

1 girl that you say you met there, gave you a drug?

2 A. She would start giving me drugs after I saw
3 Jeffrey.

4 Q. Well, my question is when was the first time?

5 A. After I saw Jeffrey. I don't know the date.

6 Q. When after, a week after?

7 A. Yeah.

8 Q. A month after?

9 A. Yeah.

10 Q. A year after?

11 A. Yeah, a week, a couple of days.

12 Q. Did she -- how did she introduce or give you
13 this drug?

14 A. She gave it to me with her hand, here you go,
15 here is some drugs.

16 Q. And what did she tell you?

17 A. Here. This will make you not nervous when you
18 go to Jeffrey's house. Take this drug.

19 Q. And what drug did she give you?

20 A. I think it was a Valium.

21 Q. Did you pay anything for it?

22 A. No.

23 Q. Were there other occasions that she gave you
24 drugs?

25 A. Yes. After every time I went to Jeffrey's

1 with her, she would give me drugs.

2 Q. Did you ever see her on any occasions other
3 than when you were going with her to Jeffrey's?

4 A. After a couple of months, we hung out and
5 that's when I got Jeffrey's number. And I didn't, I did
6 not no longer need her to take me to Jeffrey's. So we
7 hung out a couple of times. We would talk about Jeffrey
8 and how much money we were making from Jeffrey and
9 that's that.

10 Q. What do you mean you no longer needed her to
11 get to Jeffrey's?

12 A. I had Jeffrey's phone number so I could call
13 him so he could send a taxi over, or he could send
14 somebody from his house to come pick me up to go to
15 Jeffrey's. I didn't need her or one of her friends to
16 drive me to Jeff, to Jeffrey's anymore. And now I was
17 one of Jeffrey's girls to find more girls, so --

18 Q. And this, this occurred when, that is that
19 [REDACTED] never -- stopped taking you there and you began
20 to go over there on your own?

21 A. Within a month.

22 Q. Now, you said that, that, something about
23 taking a cab. Who -- weren't you the person that called
24 the cab?

25 A. I have called cabs, yes.

1 Q. And then you rode a cab from wherever you were
2 to Jeffrey's house?

3 A. Yes.

4 Q. Did anyone else call a cab for you to take a
5 ride from wherever you were to Jeff's house other than
6 you?

7 A. Yes.

8 Q. Who?

9 A. Either my, one of the girls that I brought or
10 Jeffrey would call a cab or one of Jeffrey's assistants.

11 Q. How do you know that -- when you say Jeffrey
12 called a cab, can you tell me any incident where you
13 know that Jeffrey called a cab on your behalf?

14 A. I would call him and I would say how do I get
15 there, Jeffrey. He would say don't worry, I will have a
16 cab come to your house. I will call a cab.

17 Q. So, you don't know whether he called a cab or
18 not?

19 MR. EDWARDS: Object to the form.

20 THE WITNESS: I'm, I'm not, you know, I'm not
21 a psychic. I didn't go to his house in my mind and
22 see if he physically picked the phone up. He
23 probably told one of his maids or something to do
24 it. Maybe he called a cab.
25

1 BY MR. LUTTIER:

2 Q. Fair statement to say you don't know if he did
3 or not?

4 A. He told me that he was going to call a cab so
5 I could get to his house.

6 Q. Do you know if Jeffrey Epstein ever called a
7 cab --

8 MR. EDWARDS: Object to the form.

9 BY MR. LUTTIER:

10 Q. -- to be sent out to you to get you?

11 A. Yes.

12 Q. How do you know that?

13 A. Because he told me.

14 Q. Is that the only basis that you have --

15 A. Yes.

16 Q. -- for making that statement? You never heard
17 him get on the phone with a cab; is that right?

18 A. No, we never made a three-way call to the cab
19 station.

20 Q. Do you know whether or not on times when you
21 claim that he told you he was going to have a cab
22 whether he called for the cab or someone else called for
23 the cab?

24 MR. EDWARDS: Object to the form.

25 THE WITNESS: Excuse me?

1 BY MR. LUTTIER:

2 Q. Do you know whether or not on those occasions
3 where you claim that Jeffrey told you he was going to
4 call a cab, whether he called the cab or someone else
5 called for the cab?

6 MR. EDWARDS: Object to the form.

7 THE WITNESS: Jeffrey would get on the phone
8 with me. Hi, Jeffrey, how am I going to get to
9 your house. Don't worry [REDACTED], I will take care of
10 it. I will call a cab. Sometimes he would say
11 that. Sometimes he would say, don't worry, [REDACTED], I
12 will have one of my assistants or [REDACTED] will call a
13 cab. Sometimes I didn't talk to Jeffrey.
14 Sometimes [REDACTED] picked up the phone and said she
15 would call a cab.

16 BY MR. LUTTIER:

17 Q. On how many occasions do you claim that
18 Jeffrey allegedly told you that he was going to call a
19 cab?

20 A. Definitely over 20 times.

21 Q. And you said that on some occasions, to use
22 your words, one of the girls would call. What girls are
23 you talking about?

24 A. The girls that I would recruit for him.

25 Q. So you were finding other girls that you would

1 take to Jeffrey's place?

2 A. Yes.

3 Q. And you were paid money to do that?

4 A. Yes.

5 Q. How much were you paid?

6 A. \$200.

7 Q. On those occasions that you took other girls
8 to Jeffrey's house, what did you do once you got to the
9 house?

10 A. We would walk in the house. Sometimes he
11 would just say the door is open, walk on in. Sometimes
12 someone else would answer the door. He had multiple
13 people at his house all the time, either they were
14 maids, chefs, or quote, unquote, models. He said that
15 they were girls who traveled with him would answer the
16 door.

17 By the time I already knew the drill. The
18 drill was is that we went right into the kitchen, took a
19 right. There was a staircase with pink carpet. You
20 walk up the stairs. Then you take a left. You walk up
21 another thing of stairs, and then you take another
22 little left, curve to the right. There is his big
23 bedroom. There is a picture on the wall to the right on
24 the hallway before you walk into his room of a little
25 naked girl, probably three years old with her pants

1 hanging down.

2 And then you walk into his bedroom. Big bed
3 on the left. Always white linen. And in that bedroom
4 there was another room to the left. There was a steam
5 shower. There was a steam room in there. A shower
6 right next to the steam room. There was a bathroom to
7 the left of the steam room. There was a closet on the
8 opposite, opposite side of that bathroom.

9 There was a dresser right next to that closet
10 that had lotions, different lotions. I remember I think
11 they were from the Body Shop. Then there was toys
12 inside of those drawers.

13 When you opened up the closet, there was a
14 massage table. Either it would be set out for us or
15 most of the time we would have to set the table up for
16 him.

17 We would take three big towels. He liked one
18 towel laid down by his feet and two big towels laid by
19 his head.

20 He would walk in. And I would be with one of
21 my girls that I had brought. When he walked in, he
22 would wink at me if he liked the girl. Pretty much he
23 would give me a smirk or a smile like, yeah, you did a
24 good job. Then he would jump in the shower.

25 When he came in the room, sometimes he had his

1 clothes on; sometimes he had his clothes off. Sometimes
2 he had a towel around him. When he walked in the room,
3 we already had the massage table ready. There was a
4 couch right next to the massage table. We would sit
5 there. I would tell, I would instruct the girls to do
6 exactly what he told me to instruct the girls to do.

7 I would tell them take off their shoes. We
8 would take off our shoes. He would be in the shower.
9 He would say get them ready, [REDACTED], so I would tell the
10 girls to take off her shirt, take off her bra, take off
11 her pants. He likes it when you can take off your
12 panties, preferably.

13 He would get out of the shower, wipe off, lay
14 down on the massage table on his stomach. And we would
15 proceed to massage his legs. He loved his legs
16 massaged.

17 Then we would proceed to massage his back.
18 And he absolutely loved his scalp being massaged as
19 well. So one girl would get on his back, massage; one
20 girl would be massaging his scalp. His feet he liked
21 massaged.

22 Then as we are naked, and as he is naked, he
23 turns over and the guy likes to talk. He would like to
24 talk about everything: What kind of drugs we liked.
25 What kind of things we've done. If we have ever took a

1 sip of alcohol. He said that he has never drank in his
2 life. He said that he never took a sip of alcohol in
3 his life. He said did you smoke cigarettes. We would
4 tell him yes or no. He said that he never smoked a
5 cigarette in his life. He said that he was a brain
6 surgeon. He said he wanted to know what we did in our
7 daily life. He wanted to know what kind of people we
8 hung out with.

9 Q. Are you describing this happening every time
10 you went there, or are you describing an incident?

11 A. Every time we went there.

12 Q. Every time you went, every time you went --

13 A. Every time I went, every time I went with a
14 girl.

15 Q. The exact same thing you describing to a T
16 happened; is that right?

17 A. To a T.

18 Q. Every time?

19 A. Most of the time. There has been times where
20 I've went there and there was an incident where it was
21 just me. And he sat on the, and he sat on the couch and
22 talked on the phone. And I had my legs wide open, and I
23 was naked and he wanted me to massage his feet.

24 MR. CRITTON: We're done with the tape.

25 MR. LUTTIER: Are you done with the tape?

THE VIDEOGRAPHER: I need to change it.

MR. EDWARDS: Do you want to take a lunch break now?

MR. LUTTIER: Yes.

THE VIDEOGRAPHER: Going off the video record. The time is 12:10 p.m.

(A luncheon recess was held.)

THE VIDEOGRAPHER: We're on the videotape record. The time is approximately 1:30 p.m. This is the beginning of Tape Number 2.

BY MR. LUTTIER:

Q. All right, ma'am. I want to go back and ask you some more questions about [REDACTED]. Do you recall her being the friend of yours that you knew at [REDACTED] [REDACTED]?

A. Yes.

Q. Were you and she in the same class?

A. No.

Q. What class was she in in comparison to the class you were in. Was she in front of you or behind?

A. Way behind me.

Q. She was at least a [REDACTED] in high school? Had to be at [REDACTED], right?

A. I knew her before [REDACTED] [REDACTED], but yes, she was definitely -- she came into the school. Yeah,

schools. I brought her before that. I brought her before that because I had brought [REDACTED] which is now deceased. Before I had -- I had brought [REDACTED] after I brought [REDACTED]. So I brought [REDACTED] before [REDACTED] and that was way before I went to [REDACTED].

Q. Now, you said you just got off the phone with someone. Who did you get off the phone with?

A. I would rather not say.

MR. EDWARDS: I think that you are going to have to tell them who you talked to.

THE WITNESS: My mother.

BY MR. LUTTIER:

Q. So, you mean you got off the phone with her during the lunch break? You called her.

A. Yes, I was talking to her because I wanted to make sure, I wanted to see if she knew how old I was when I was going to certain schools.

Q. Well, I mean, let's be candid. You, you figured out during lunch that your testimony couldn't be accurate that your friend, [REDACTED], was 12 at the time that you took her to Jeffrey Epstein's if she in fact was a student at [REDACTED] [REDACTED]; isn't that the truth of the matter?

MR. EDWARDS: Object to the form. Object to

she was probably a [REDACTED].

Q. Well, I mean you testified earlier, you said you knew her from [REDACTED] [REDACTED], correct?

A. I didn't know her from that school. I knew her, I knew her previously from that, from that school.

Q. What did you mean when you said you knew her from [REDACTED] --

A. She lived, well, I mean that's where we mostly associated at, I guess. She lived in a neighborhood called [REDACTED] (phonetic). That's right near that school. And now that you mention it, I remember I met her through my girlfriend [REDACTED]. So, and then she just -- I remember she went to school to [REDACTED] when I went to [REDACTED] [REDACTED] as well.

Q. Now, when you said she went to [REDACTED], you meant [REDACTED]?

A. Yes.

Q. Who is [REDACTED]? [REDACTED] who?

A. I don't know her last name.

Q. And you both were attending [REDACTED] [REDACTED] at the time that you went to Jeffrey Epstein's house with her?

A. No, I just, I just got off the phone with someone and I realized that I, I remember all the, how old I was and everything when I did go to certain

the form.

THE WITNESS: No, I wasn't thinking anything of that. I was asking her because I know that I can't remember any of the years that you're asking me and stuff. So I said, hey, mom, what school -- can you tell me all the schools I went to and how old was I. And when you're talking, it's all coming back to me. I don't think you remember everything that when you were 10, 11, 12, 13, 14 years old, right off-hand, right?

But when someone explains it to you, like, oh, yeah, it comes back to me.

MR. LUTTIER: In fact --

THE WITNESS: So, I don't know why you're looking at me like that with a smirk on your face like --

MR. LUTTIER: Move to strike. You seem to think there is something amusing about this, but nobody else in the room does.

THE WITNESS: I don't think there is anything amusing about this. Are you kidding? I think it's amusing that all three of you guys are sitting there, you know, defending a sex offender. Are you kidding me? That's what I think is fucking amusing.

1 BY MR. LUTTIER:

2 Q. By the way, did your mother teach you to use
3 that language or did you acquire that in school?

4 A. Are you being -- you know what, maybe I
5 learned it in school.

6 Q. Is that where you learned that?

7 A. Maybe I learned it from Jeffrey.

8 Q. And by the way, when did you quit going to
9 school?

10 A. I quit going to school right after [REDACTED]

11 Q. [REDACTED]

12 A. [REDACTED]

13 Q. So, obviously you were engaging in sexual
14 intercourse with males no later than your 16th birthday,
15 right?

16 A. If you're asking me when I lost my virginity,
17 I lost my virginity when I was 14 years old.

18 Q. And who did you lose that to?

19 MR. EDWARDS: Object to the form. I am going
20 to instruct the witness not to answer based on my
21 previous notation for the record. This issue is on
22 appeal. And until that Rule to Show Cause Order is
23 resolved, the witness is not going to answer this
24 question. Invoking her privacy rights and the
25

1 privacy rights of third parties.

2 MR. LUTTIER: Okay. I am going to go through
3 a series of questions then.

4 MR. EDWARDS: Okay.

5 MR. LUTTIER: The first question is who did
6 you lose your virginity to. I heard that
7 objection.

8 BY MR. LUTTIER:

9 Q. And when you say you lost your virginity, what
10 act was performed that caused you to lose your
11 virginity?

12 MR. EDWARDS: Same objection.

13 BY MR. LUTTIER:

14 Q. And how many times did you perform this act
15 that caused you to lose your virginity?

16 MR. EDWARDS: Same objection.

17 BY MR. LUTTIER:

18 Q. Did you perform an act that caused you --
19 after you lost your virginity, did you continue to have
20 sexual intercourse with other people?

21 MR. EDWARDS: Same objection.

22 BY MR. LUTTIER:

23 Q. For how long were you having sexual
24 intercourse with individuals prior to going to Jeff
25 Epstein's house?

1 MR. EDWARDS: Same objection.

2 MR. LUTTIER: As I understand these
3 objections, none of these are Fifth Amendment
4 objections, correct?

5 MR. EDWARDS: Correct.

6 BY MR. LUTTIER:

7 Q. And for how many years were you sexually
8 active prior to going to Jeffrey Epstein's house?

9 MR. EDWARDS: Same objection.

10 BY MR. LUTTIER:

11 Q. And please describe for me each sexual act
12 that you performed either with males or with females
13 prior to the time you first went to Jeffrey Epstein's
14 house.

15 MR. EDWARDS: Same objection.

16 BY MR. LUTTIER:

17 Q. Did you have -- did you perform any sexual act
18 with females prior to the time that you first went to
19 Jeffrey Epstein's house?

20 MR. EDWARDS: Same objection.

21 BY MR. LUTTIER:

22 Q. Prior to the time you lost your virginity, did
23 you engage in any sexual acts with any males other than
24 intercourse?

25 MR. EDWARDS: Same objection.

1 BY MR. LUTTIER:

2 Q. Did you have oral sex; that is, did you place
3 a male's penis in your mouth at any time prior to the
4 time that you went to Jeffrey Epstein's house for the
5 first time?

6 MR. EDWARDS: Same objection.

7 BY MR. LUTTIER:

8 Q. Have you ever been filmed at any time engaging
9 in any type of sexual act?

10 A. Have I been filmed? I filmed myself.

11 Q. And when was that?

12 A. I was 19.

13 Q. What year would that be?

14 A. Well, it's '09. So, that would be '07.

15 Q. And would you tell us the circumstances under
16 which you filmed yourself in a sex act when you were 19
17 in 2007?

18 MR. EDWARDS: Same objection and I am
19 instructing her not to answer. And she will invoke
20 her Fifth Amendment rights at this time as well.

21 MR. GOLDBERGER: She needs to do that.

22 MR. LUTTIER: Yes.

23 THE WITNESS: On advice of counsel, I invoke
24 my Fifth Amendment rights under the United States
25 Constitution.

1 MR. CRITTON: Cindy, mark two pages back.
 2 There is something I want from there.
 3 BY MR. LUTTIER:
 4 Q. When you filmed yourself in a sex act when you
 5 were 19 in 2007, was anyone else performing the sex act
 6 with you?
 7 MR. EDWARDS: Same objection. I am
 8 instructing the witness not to answer. Invoking
 9 her Fifth Amendment rights as well.
 10 MR. CRITTON: She needs to read.
 11 MR. EDWARDS: Okay.
 12 THE WITNESS: On advice of counsel I invoke my
 13 Fifth Amendment rights under the United States
 14 Constitution.
 15 BY MR. LUTTIER:
 16 Q. Did someone request you to film yourself in a
 17 sex act when you were 19 in 2007?
 18 MR. EDWARDS: Same objection.
 19 MR. LUTTIER: How is that Fifth Amendment?
 20 MR. EDWARDS: You're, you're going to refer to
 21 the sex act --
 22 MR. LUTTIER: No, I asked --
 23 MR. EDWARDS: -- that's being filmed.
 24 BY MR. LUTTIER:
 25 Q. My question is, did someone request you to

1 film yourself in a sex act when you were 19 in 2007?
 2 MR. EDWARDS: Same objection. And you can
 3 read.
 4 THE WITNESS: On advice of counsel, I invoke
 5 my Fifth Amendment rights under the United States
 6 Constitution.
 7 BY MR. LUTTIER:
 8 Q. Well, with your invoking of the Fifth
 9 Amendment suggests that you think you're going to be
 10 prosecuted for something?
 11 MR. EDWARDS: You don't have to answer.
 12 BY MR. LUTTIER:
 13 Q. Did you voluntarily film yourself in a sex act
 14 when you were 19 in 2007?
 15 MR. EDWARDS: She's not answering.
 16 THE WITNESS: On advice of counsel, I invoke
 17 my Fifth Amendment rights under the United States
 18 Constitution.
 19 MR. LUTTIER: And that's the sole basis for
 20 refusing to answer that question?
 21 MR. EDWARDS: This is also precluded because
 22 this is an issue that deals with the issue on
 23 appeal. And until that is resolved, we're not
 24 going to answer those questions. So we're resting
 25 on that as well as the Fifth Amendment at this

1 time.
 2 BY MR. LUTTIER:
 3 Q. Did you ever film yourself in a sex act prior
 4 to the occasion that you did it when you were 19 in
 5 2007?
 6 A. No. No, sir.
 7 Q. Did you publish this film that you made of
 8 yourself engaged in a sex act when you were 19?
 9 A. No.
 10 Q. Did it go on the Internet?
 11 A. No.
 12 Q. Did you ever show it to anyone?
 13 A. No.
 14 Q. Are you sure?
 15 MR. EDWARDS: Objection, asked and answered.
 16 THE WITNESS: I am actually positive that I
 17 did not show myself doing any sexual act.
 18 BY MR. LUTTIER:
 19 Q. For what purpose did you film yourself in a
 20 sex act when you were 19?
 21 A. On advice of counsel I invoke my Fifth
 22 Amendment rights under the United States Constitution.
 23 Q. Did anyone make you film yourself in a sex act
 24 when you were 19?
 25 A. On advice of counsel I invoke my Fifth

1 Amendment rights under the United States Constitution.
 2 MR. EDWARDS: And the objection is also as to
 3 right of privacy as well.
 4 BY MR. LUTTIER:
 5 Q. Did you voluntarily film yourself in a sex act
 6 when you were 19 in 2007?
 7 A. On advice of counsel I invoke my Fifth
 8 Amendment rights, rights under the United States
 9 Constitution.
 10 Q. Did you gain enjoyment as a result of filming
 11 yourself in a sex act when you were 19 in 2007?
 12 MR. EDWARDS: Same objection. I am
 13 instructing her not to answer this line. That
 14 question may not implicate the Fifth Amendment, but
 15 there are privacy issues here. And until that
 16 issue is resolved, I am instructing the witness not
 17 to answer.
 18 BY MR. LUTTIER:
 19 Q. Did you suffer any type of injury at all as a
 20 result of filming yourself in a sex act when you were 19
 21 in 2007?
 22 A. Nope.
 23 Q. When you filmed yourself in this sex act when
 24 you were 19, were any inanimate objects used? Do you
 25 know what I mean by inanimate objects?

MR. EDWARDS: I am instructing the witness not to answer based on my previous objection related to privacy issues.

BY MR. LUTTIER:

Q. Why did you film yourself in a sex act when you were 19?

MR. EDWARDS: Same objection based on the privacy issue. She's not answering the question.

BY MR. LUTTIER:

Q. Did you film yourself on a videotape with this, the sex acts when you were 19?

A. No.

Q. Did you do it on a camera?

A. Yes.

Q. Was the camera hooked up to an Internet?

A. No.

Q. What type of camera was it?

A. Digital.

Q. Did it take still shots or video?

A. Video.

Q. And did the video ever find its way onto the Internet?

A. No.

Q. Did you ever post it or any frames from that video of you engaged in the sex act when you were 19 on

content that was on there?

A. I, I know that on my behalf there has been pictures and everything and notes and stuff downloaded from [REDACTED]

Q. My question is did you do that?

A. No.

Q. Did you give your password or pass code to someone so they could do that?

A. Yes.

Q. And who did you give that information to?

MR. EDWARDS: Object, object to the form, attorney-client privilege.

BY MR. LUTTIER:

Q. Did you give that information to anyone other than your lawyer who is representing you in this matter?

MR. EDWARDS: Objection. It's attorney-client privilege. And if it was given to people associated with the law firm that this witness may not recognize as attorney-client privilege, same objection. She's not going to answer.

BY MR. LUTTIER:

Q. Did you give that information to anyone other than your lawyer or an employee of his law firm in this case?

A. No, sir.

your Facebook site?

A. I have never had a Facebook site, sir.

Q. You are sure of that?

A. Absolutely positive I have never had a Facebook site.

Q. Okay. Let me correct that.

A. Sorry [REDACTED]

Q. [REDACTED] You do have a [REDACTED] site?

A. As of right now, I do not.

Q. But that's because somebody told you to take it down because of this litigation, right?

A. No, sir.

Q. As a matter of fact, you were ordered to produce hard copies of what was on your [REDACTED] site in this lawsuit, were you not?

A. No, sir.

Q. Did you know that you did produce it?

A. That I produced what?

Q. Copies of stuff off your [REDACTED] in this lawsuit.

A. Oh, I knew that actions were going on like that, but that's not why I proceeded to erase my [REDACTED].

Q. Did you go onto your [REDACTED] site and make copies that were produced in this case of what the

Q. Prior to the time that you gave that information to your lawyer or someone that is employed by him, did you remove content from your [REDACTED] site?

A. I have, ever since I've had [REDACTED], I remove and I add all sorts of pictures on there.

Q. And when did you first start the [REDACTED] site?

A. That was in [REDACTED].

Q. Is there anything at all that you ever have put on your [REDACTED] site since you first opened it that you find you would find now to be embarrassing?

A. Embarrassing? No. I mean, there are some pictures that are pretty goofy. I don't, if I thought it was so embarrassing, I wouldn't have posted the pictures on there.

Q. So that it's clear for the ladies and gentlemen of the jury, if they are shown content from your [REDACTED] site from the time you first opened it until the present, your testimony is you don't find any of that to be embarrassing. You would only characterize it as goofy, some of the things; is that right?

MR. EDWARDS: Object to the form.

THE WITNESS: Personally in everybody's life, people have fun. And when they go out, they have fun and they do fun things and they make memories. Okay. I don't think anything I have ever posted on

1 [REDACTED] would be embarrassing to me, no. Everybody
 2 can see it.
 3 BY MR. LUTTIER:
 4 Q. That's wasn't my question, whether everybody
 5 can see it.
 6 A. What's your question?
 7 Q. So that it's clear to the ladies and gentleman
 8 of the jury, you would not find any of the material
 9 that's ever been posted on your [REDACTED] site to be
 10 embarrassing?
 11 A. No, sir.
 12 MR. EDWARDS: Object, object to the form.
 13 BY MR. LUTTIER:
 14 Q. Nothing on that [REDACTED] site would have caused
 15 you any embarrassment or humiliation, correct?
 16 MR. EDWARDS: I would object, object to the
 17 form.
 18 THE WITNESS: No. For what reason?
 19 BY MR. LUTTIER:
 20 Q. No, listen to my question.
 21 A. I heard your question. No, sir, is the
 22 answer.
 23 Q. No what?
 24 A. No, I do not think anything is embarrassing on
 25 the [REDACTED]

1 Q. My question was nothing that's ever been put
 2 on your [REDACTED] site has ever caused you any
 3 embarrassment or humiliation, correct?
 4 MR. EDWARDS: Object to the form.
 5 THE WITNESS: Not that I recall.
 6 BY MR. LUTTIER:
 7 Q. You have never suffered one iota of damage as
 8 a result of anything that appears on your [REDACTED] site,
 9 that is appears now or ever did appear on it, correct?
 10 A. Not that I recall.
 11 Q. And anything on your [REDACTED] site or anything
 12 that's ever been put on your [REDACTED] site, would you say
 13 reflects positively on you?
 14 MR. EDWARDS: Object to the form.
 15 THE WITNESS: No.
 16 BY MR. LUTTIER:
 17 Q. Would it be the type of thing that you would
 18 like your [REDACTED] to see?
 19 A. No.
 20 Q. Why not?
 21 A. That's not something that a [REDACTED]
 22 should see when a 21-year-old is out having a good time
 23 and making memories with her friends.
 24 Q. Well, specifically what is it that you would
 25 not want your [REDACTED] to see?

1 A. Just certain pictures of me drinking alcohol
 2 and taking shots and doing stuff like that.
 3 Q. Is that it, just pictures of you drinking
 4 alcohol and taking shots?
 5 MR. EDWARDS: Object to the form.
 6 THE WITNESS: I wouldn't want my [REDACTED]
 7 to see pictures of me when I was modeling, you
 8 know, when I was modeling [REDACTED]
 9 BY MR. LUTTIER:
 10 Q. What do you mean modeling [REDACTED]?
 11 A. I modeled for [REDACTED]
 12 Q. And when was that?
 13 A. In [REDACTED]
 14 Q. And why don't you describe for the ladies and
 15 gentlemen of the jury what those pictures depict?
 16 A. Me in a [REDACTED] posing [REDACTED]
 17 Q. Would you say that they were sexually
 18 suggestive pictures?
 19 MR. EDWARDS: Object to the form.
 20 THE WITNESS: No, sir, I don't. I think that
 21 people try to advertise for their, you know, their
 22 [REDACTED]
 23 [REDACTED]
 24 Just like if you were going to buy a
 25 car, there is a sexy girl next to it. That's what

1 I did.
 2 BY MR. LUTTIER:
 3 Q. And your, you effort in doing this for [REDACTED]
 4 [REDACTED] was to portray yourself in a sexually
 5 explicit manner in order to sell [REDACTED], correct?
 6 MR. EDWARDS: Object to the form.
 7 THE WITNESS: Sure, if that's what, how you
 8 want to put it. Like that's the United States.
 9 Are you kidding me?
 10 BY MR. LUTTIER:
 11 Q. That's, that's the society and the age that
 12 you grew up in, right?
 13 A. I think that you grew up in it, too.
 14 Q. For example, the level of dress that you were
 15 in in those pictures, you do not find to be offensive,
 16 correct?
 17 A. No, I would wear it to the beach.
 18 Q. Okay. I mean, nudity, you don't find nudity
 19 to be offensive, do you?
 20 A. Yeah, I do.
 21 Q. You do?
 22 A. I do.
 23 Q. And when did you first find nudity to be
 24 offensive?
 25 A. Nudity was offensive to me when I walked into

1 Jeffrey's house and I had to get naked for him when he
2 was on a massage table. That kind of offended me, you
3 know.

4 Q. And so what did you say to indicate that you
5 were offended?

6 A. I was nervous as hell.

7 Q. No, my question is what did you say?

8 A. What did I say? I didn't say anything because
9 I was getting paid \$200. I was a little girl coming
10 from a [REDACTED] walking into a mansion. What do you want
11 me to say?

12 Q. Ma'am, it's not a question of what I want. I
13 am just asking you what you did.

14 A. Well, you're talking to me like I'm stupid,
15 and I don't appreciate it.

16 Q. You went to Jeff's. This [REDACTED] friend of
17 yours took you there, right?

18 A. Yeah.

19 Q. And she told you some things before she took
20 you there, correct?

21 A. Yeah.

22 Q. Tell me what she told you.

23 A. [REDACTED] said, hey, do you want to make \$200.
24 I said yes, that would be great; how. She says, well,
25 you just have to walk upstairs, and you have to, we just

1 have to massage a guy. And I am like, okay and I am
2 like, well, how old is this guy. Oh, he is old. Don't
3 worry. He is an old guy. And the conversation pretty
4 much said, hey, you know -- I said no a couple of times,
5 and I said I really -- I was uneasy about going. I
6 really don't want to go.

7 And then it escalated that I ended up going
8 because she persuaded me into it. I was a young little
9 girl that was stupid and naive and went to go massage a
10 50-year-old man naked on a fucking massage table and got
11 paid \$200 for it.

12 Q. And after that occasion that you have just
13 described, you went back how many times, 50 times?

14 A. More than 50 times.

15 Q. Each time you went back voluntarily, correct?

16 A. Voluntarily.

17 MR. EDWARDS: Object to the form.

18 BY MR. LUTTIER:

19 Q. When you went with [REDACTED], you went
20 voluntarily, correct?

21 MR. EDWARDS: Object to the form.

22 THE WITNESS: Yes, sir.

23 BY MR. LUTTIER:

24 Q. Mr. Epstein never made you do anything against
25 your will, correct?

1 MR. EDWARDS: Object to the form.

2 THE WITNESS: Now, that, when a, when a -- I
3 will just let you know, when a 13-year-old little
4 girl is in front of a 50-year-old man, with a lot
5 of money and a lot of power with a big house that
6 she's never saw before and that promises you that
7 he can get you stuff from Brazil, and he can get
8 you anything you want, and that you might go and
9 model some day and, oh, I'm worth so much. And if
10 he influences you and puts this all in your head.
11 Okay.

12 And he wants to see a little peak, a little
13 peak here and a little peak there, and if he wants
14 a little touch here and little touch there because
15 he reassures you that you're going to be better
16 when you get older, I think that little brainwash.
17 Yeah, I definitely allowed him to see it because I
18 was fucking scared.

19 MR. LUTTIER: Well, that's all --

20 THE WITNESS: It's scary.

21 BY MR. LUTTIER:

22 Q. That little soliloquy is what your
23 [REDACTED] that you've gone to since you filed the
24 lawsuit told you, right?

25 A. Not at all.

1 Q. By the way --

2 A. Not at all.

3 Q. -- did you ever go to a [REDACTED] or a
4 [REDACTED] before you filed this lawsuit?

5 A. Not that I recall.

6 Q. Ever in your entire life?

7 A. Not that I recall.

8 MR. EDWARDS: Object to the form, asked and
9 answered.

10 BY MR. LUTTIER:

11 Q. Did you have anything traumatic happen to you
12 in your entire life before you filed this lawsuit?

13 A. No.

14 Q. Nothing ever was traumatic to you, right?

15 A. No.

16 Q. Well, let me put this way so that it's clear
17 for the jury: Anything that happened to you prior to
18 the day you filed this lawsuit you would describe as not
19 being traumatic, right?

20 MR. EDWARDS: Object to the form.

21 THE WITNESS: Nothing happened to me from when
22 I was younger than 13 to the day I was born that
23 was traumatic at all.

24 BY MR. LUTTIER:

25 Q. Has anything traumatic happened to you since

1 you filed this lawsuit?

2 A. You damn right.

3 Q. What, what has happened to you since you filed
4 this lawsuit that's traumatic?

5 A. Psychologically messed me all up in my head.
6 Okay, here's, here's a young girl 13-years-old of age
7 going and taking myself every single day to a man's
8 house, okay, to show my body, to show my vagina, to show
9 my, my boobs, you know, that I hardly didn't even have.
10 Okay.

11 And I would bring all these girls and I would
12 beg them, come on, come on, we're going to make \$200. I
13 am psychologically fucked up in the head from that. Now
14 I feel so incredibly bad that I brought any of these
15 little girls there. It's sickening.

16 Okay. I have got to live with this for the
17 rest of my life. That man right there he has shown me
18 that later on in life, all I've got to do is show a
19 little bit of vagina and a little bit of fucking boobs
20 so I can make some money. And now for the rest of my
21 life, I have got to try to keep from my son that his
22 mother was a prostitute to put bread and butter on the
23 table for him.

24 Q. Well, in fairness --

25 A. So live with that.

1 Q. -- you weren't a prostitute to bread and
2 butter on the table for your son, were you?

3 A. Really? For years I was.

4 Q. That's not why you became a prostitute, was
5 it?

6 A. Are you -- what are you trying to say here?

7 Q. You didn't become a prostitute because you had
8 to feed your son, did you?

9 A. When I met Jeffrey --

10 Q. Just answer my question, ma'am. You didn't
11 become a prostitute because you had to feed your son,
12 did you?

13 A. I don't even know how to answer this.

14 Q. That's because you know the answer is no,
15 don't you? You were a prostitute before your son was
16 ever born, weren't you; isn't that right?

17 A. You're an asshole.

18 Q. You were a --

19 A. You're a fucking asshole.

20 Q. The truth hurts, doesn't it, ma'am?

21 A. The truth hurts?

22 Q. Right. You were a prostitute --

23 A. You know what, you're fucking representing
24 someone that took a 13-year-old little girl, many, many
25 little girls, and took them in their house. And you

1 know you're wrong. You know you're wrong, because you
2 fucking messed with us. He messed with us. He touched
3 us. He's sick. You are disgusting. You make me throw
4 up.

5 Q. You weren't 13 at the time, were you, ma'am?

6 A. I was 13. I was 14. I was 15. I got
7 [REDACTED]

8 Q. [REDACTED]?

9 A. No, thank the Lord have mercy.

10 Q. You had learned to engage in sexual relations
11 with men someplace apart from Mr. Epstein, had you not?

12 A. I had learned from Jeffrey that it was easy
13 money.

14 Q. Are you saying --

15 A. Easy money.

16 Q. -- the father of your child paid you money to
17 have sex with you?

18 MR. EDWARDS: Objection to form.

19 THE WITNESS: Not at all.

20 MR. EDWARDS: And just -- objection to the
21 form.

22 THE WITNESS: You're sick.

23 MR. EDWARDS: Wait until he asks a question.

24 BY MR. LUTTIER:

25 Q. Now, let's go back to your [REDACTED] site. Are

1 there any other pictures other than ones of you modeling
2 for a [REDACTED] which you would not want your son to
3 see?

4 A. Of course.

5 Q. What other pictures --

6 A. Is there any pictures that you wouldn't want
7 your son or daughter to see?

8 Q. Well, ma'am, actually there is not.

9 A. You are just fucking sitting here making
10 money.

11 Q. Can you answer my question now?

12 A. There is a lot of pictures that I would not
13 want my son to see.

14 Q. Which ones?

15 A. Now what?

16 Q. Which ones?

17 A. Which ones? Multiple ones. Do you want to
18 bring them out so I can point them, pinpoint them to
19 you.

20 Q. I want you to describe them for the jury.

21 MR. EDWARDS: Object to the form.

22 THE WITNESS: I have already told you, the
23 [REDACTED] pictures, ones of me taking shots.

24 BY MR. LUTTIER:

25 Q. What do you mean taking shots? Are you

1 talking about alcohol?

2 A. Taking tequila shots.

3 Q. Okay. You were out parting, right?

4 A. Yeah, like normal people do like you're going
5 to probably do after this with all your fucking money.

6 Q. And nobody was forcing you to do anything
7 that's depicted on these photographs that have appeared
8 on your [REDACTED]?

9 A. Nobody forced me to do it, no.

10 Q. And you do, of course, know that everything
11 you have ever put on [REDACTED] is still on [REDACTED] don't
12 you?

13 A. No, I don't know.

14 Q. And you do realize that all of that is
15 subpoenaable and can be obtained?

16 MR. EDWARDS: Object to the form.

17 THE WITNESS: Cool.

18 BY MR. LUTTIER:

19 Q. Now, can you think about --

20 A. Who cares?

21 Q. -- any particular incidents that are reflected
22 in pictures on your [REDACTED] site that you would find
23 offensive to show your son?

24 MR. EDWARDS: Object to the form.

25

1 There is some pictures that I don't want my son to
2 see. There are some picture that, sure, he can
3 see. Now what? What is the point here? You keep
4 on asking me these questions 20 times.

5 Does this have anything to do with what you're
6 trying to get to, because I would really like to
7 know.

8 BY MR. LUTTIER:

9 Q. Which pictures would you not want your son to
10 see?

11 A. I don't know. There was like 450 pictures I
12 posted on [REDACTED]

13 Q. And just so that we can understand your
14 memory, if the jury sees the pictures, so that it's
15 clear, as you sit here today, you can't describe any of
16 the pictures that you wouldn't want your son to see
17 other than the [REDACTED] modeling pictures?

18 MR. EDWARDS: Hold on.

19 MR. LUTTIER: Is that right?

20 MR. EDWARDS: I would object to the form. And
21 if counsel wants to show these pictures --

22 THE WITNESS: Thank you.

23 MR. EDWARDS: -- to the witness for the
24 witness to identify which ones that her son
25 would --

1 BY MR. LUTTIER:

2 Q. Other than the [REDACTED]?

3 THE WITNESS: No, no, no, no.

4 BY MR. LUTTIER:

5 Q. Do you remember any kind of --

6 A. No, I don't.

7 Q. Any kind of --

8 A. What are you getting to? No, I don't.

9 Q. Any kind of party that you were ever at that
10 you had sites, pictures on your [REDACTED] site about?

11 A. No.

12 Q. Did you ever -- were there ever any pictures
13 on your [REDACTED] site of you engaging in any type of
14 conduct with other females that you wouldn't want your
15 son to see?

16 A. Yeah, of course I would not want my son to see
17 that.

18 Q. Describe what you were doing in those
19 photographs for the jury.

20 A. I don't remember, sir.

21 Q. So, how do you know you wouldn't want your son
22 to see them?

23 A. What are you getting to?

24 MR. EDWARDS: Object to the form.

25 THE WITNESS: What is the whole point of this.

1 THE WITNESS: I agree.

2 MR. EDWARDS: -- want to see and which ones
3 she does not, okay. If she can't remember every
4 picture, she's given her answer.

5 BY MR. LUTTIER:

6 Q. I don't expect you to remember but I do want
7 to find out whether your memory is good enough to
8 remember any of the ones that you wouldn't want your son
9 to see. So, if you have told me everything that you can
10 recall, I am happy to accept your answer.

11 So, is there any other photographs that you
12 can tell the ladies and the gentlemen of the jury that
13 have appeared on your [REDACTED] that you would not want
14 your son to see?

15 A. I just told you. There are some pictures that
16 I wouldn't mind him looking at. Most of them are him.

17 Q. And did you understand my question?

18 A. And, and some of them, I would not want him to
19 see.

20 Q. Tell me the ones --

21 A. Like my attorney just said, if you want to
22 bring me the pictures, I will pinpoint them out to you.

23 Q. I want to know --

24 A. But I have posted over 400 pictures on
25 [REDACTED]

1 Q. Okay. So that we're clear, you can't, as you
2 sit here today remember any photographs that you would
3 not want your son to see --

4 A. Yeah.

5 Q. -- other than some pictures --

6 A. Yeah, I can, I can damn sure remember a lot of
7 them.

8 MR. EDWARDS: Argumentative.

9 BY MR. LUTTIER:

10 Q. All right, then tell me -- describe the ones
11 that you don't want your son to see.

12 A. Okay. Let's go, let's start from point A.
13 Okay. I wouldn't want my son to see me partying. I
14 wouldn't want my son to see me drinking. I wouldn't
15 want my son to see me in the, in a [REDACTED] I
16 wouldn't -- oh, yeah, that's right on my [REDACTED] picture
17 I did kiss a girl. I really wouldn't want him to see
18 that. Let me think. I can't think of anymore.

19 Q. When you say partying, what do you mean?

20 A. Just dancing and drinking a lot.

21 Q. Okay. And are any of the other girls that you
22 took to Mr. Epstein's house, are any of them pictured in
23 any of these pictures that you have on your [REDACTED]
24 site?

25 A. Yeah.

1 Q. Who?

2 A. [REDACTED]

3 Q. [REDACTED] who?

4 A. [REDACTED]

5 Q. And why don't you tell the court what your
6 relationship with [REDACTED] is?

7 A. We're good friends. We have been good friends
8 for years.

9 Q. Lifelong friends, haven't you been?

10 A. Lifelong.

11 Q. Would you consider your best friend?

12 A. No.

13 Q. One of your best friends?

14 A. Sure.

15 Q. And how old is she as compared to you?

16 A. She's maybe six months younger than I, or six
17 months older than I am.

18 Q. Did you go to school with her?

19 A. No.

20 Q. And did you ever take her over to
21 Mr. Epstein's?

22 A. Yep.

23 Q. At the time that you took her over there, was
24 she one of your best friends?

25 A. Yes.

1 Q. And what did you tell her about what she was
2 going to be doing?

3 A. I said, hey, [REDACTED], do you want to go to this
4 guy's house. He will give you \$200 if you stand there
5 naked. He is going to jack-off and ejaculate in his
6 hand, and then we're going to leave. Do you want to do
7 it. She said no. She said no a couple of times. More
8 than a couple of times. Then I convinced her just like
9 [REDACTED] convinced me.

10 Q. Did you tell her anything else?

11 A. From what I recall, I said we're going to go
12 make some money. We're going to walk up some pink
13 stairs. It's a huge mansion. And there is a chef and
14 he can make you food. And sometimes we can get, like,
15 free, like, bikinis and stuff that Jeffrey will give us.
16 And Jeffrey is an old man. We have nothing to worry
17 about. We're going make \$200 standing there naked. He
18 might use a vibrator, might use his hands. Yeah, that's
19 it.

20 Q. So, [REDACTED] knew exactly what was going to happen
21 when you took her over to Jeff Epstein's house, correct?

22 MR. EDWARDS: Object to the form.

23 MR. LUTTIER: Correct?

24 THE WITNESS: Correct.
25

1 BY MR. LUTTIER:

2 Q. You told her?

3 A. I told her.

4 Q. She went over there with eyes wide open?

5 A. Yeah, mind you she was 14 years old.

6 Q. How long had you been going to Mr. Epstein's?

7 A. Only a couple of months.

8 Q. Before you decided to invite your friend over?

9 A. Yep.

10 Q. And then did you tell your friend [REDACTED] that
11 you were going to get paid money to take her there?

12 A. Yep.

13 Q. When did you tell her you were getting paid
14 money to take her there?

15 A. When did I tell her?

16 Q. Yeah.

17 A. I told her -- when did I tell her? I told her
18 the first time I told her about Jeffrey.

19 Q. So, the first time that you told your friend
20 Carol W. and asked her to go to Mr. Epstein's, you told
21 her at the same time you were going to receive money as
22 a result of taking her there; is that correct?

23 MR. EDWARDS: You're talking about [REDACTED],
24 right?

25 MR. LUTTIER: [REDACTED], I'm sorry.

MR. EDWARDS: Okay.

THE WITNESS: From what I recall. Maybe I told her I was making money. Maybe I didn't.

BY MR. LUTTIER:

Q. Which was it?

A. I don't know. I forgot.

Q. It would be an, an event that you would remember since it was one of your best friends that you were doing this with, right?

MR. EDWARDS: Object as to the form, argumentative.

THE WITNESS: I brought every girl I could find because it was an extra \$200.

BY MR. LUTTIER:

Q. And you didn't think there was anything wrong with it, right?

A. Oh, I knew there was definitely something wrong with it.

Q. All right. So, you consciously knew that you shouldn't be doing what you were doing; is that a correct statement?

A. Correct.

Q. You did it anyway, right?

A. Correct. Obviously just like all these other girls did, isn't that funny.

Q. It was your free choice though?

A. Yeah, free choice.

MR. EDWARDS: Objection.

BY MR. LUTTIER:

Q. And it was [REDACTED] free choice to do it?

A. Yeah.

Q. And she did it wide open because you told her exactly what was going to happen?

A. Oh, yeah, it was so easy, let me tell you.

Q. And it was, it was -- and you did it for the money; is that right?

A. At that time, yes, I did, after walking into his mansion. And after my dad, he had to only buy me Dollar Store clothes, you damn right I did it for the money.

Q. Did you share with [REDACTED] or [REDACTED], any of the money that you got paid by Jeff Epstein for bringing her?

A. No, not that I recall.

Q. So, you just kept that money. What did you do with the money that you got from Jeffrey Epstein to bring [REDACTED]?

A. I actually saved a lot of it. I would save a lot of it, and I would buy clothes, clothes that I didn't have. I would buy shoes, shoes that my father

couldn't afford, the new things that were out, you know, so I could be the cool kid. I would buy whatever was, was cool that day.

Q. And where did you bank? Where did you put this money that you saved?

A. In a hiding place in my house.

Q. So, you didn't put it in a bank?

A. I was 13 years old. No, I didn't put it in a damn bank.

Q. And when you say a hiding place in your house, which house are you referring to?

A. In my [REDACTED].

Q. At your father's?

A. Yeah.

Q. And did you tell your dad about it?

A. No, not at the beginning. I told my dad that I was cleaning houses later on.

Q. And was that a true statement?

A. No.

Q. So you lied to your father?

A. Yeah.

Q. Did you tell [REDACTED], anything else before you took her to Mr. Epstein's house the first time?

A. Not that I recall. I said we're going to go there in a taxi. Everything will be paid for.

Everything would be taken care of. Don't worry. It's a quick 30 minutes. We will be in and out. We're going to make \$200.

Q. Each?

A. Each.

Q. Right. And did you tell her anything about, anything she should say about her age?

A. Not that I recall. I said just don't say anything.

Q. What do you mean? I don't understand what you mean.

A. I said don't say anything.

Q. Don't say anything about what?

A. Don't say anything about your age.

Q. Oh, so you did say something to her about age?

A. Yes.

Q. All right. Tell me as best as you can recall what you told --

A. I said [REDACTED]. --

Q. Wait a minute. Let me finish my question -- what you told [REDACTED], with respect to any questions asked about age?

A. I said [REDACTED], don't say anything about your age.

Q. Did you say why?

1 A. Well, I said we're not over 18, and this is
2 like really bad. This is like really illegal. We're
3 not supposed to even be here, so don't say a damn thing
4 about your age.

5 Q. And you said all of the things that you just
6 said here to [REDACTED] before she went to Mr. Epstein's the
7 first time?

8 A. Yes, sir.

9 Q. You, according to you then, you knew at least
10 at that point in time, or were of the belief that what
11 you were doing was illegal?

12 A. Yes.

13 Q. But you did it anyway?

14 A. Yeah, because I am the bad guy, right?

15 Q. Actually, at that point in time that you first
16 went to Mr. Epstein's, had you done other illegal
17 things?

18 A. No.

19 Q. None at all?

20 A. I smoked weed.

21 Q. That was the only other illegal thing you had
22 done?

23 A. Yeah. I smoked weed.

24 Q. Okay. And what, if anything, did you tell
25 [REDACTED] about Mr. Epstein himself before you took her to

1 his house?

2 A. I said oh, my God, this guy is so rich. He
3 has so much money. Oh, you're not going to believe this
4 house when you see it. It's absolutely gorgeous. Oh,
5 he has, he like lives right on the water. He lives on
6 the Palm Beach Island which is like really expensive.
7 And I was very intimidated. I just told her how
8 wonderful his house looked and how, how much money he
9 had.

10 Q. Did you tell her anything about whether or not
11 Mr. Epstein was respectful?

12 A. I said, yeah, I was like don't worry. He is,
13 he is an easy-going guy. He will give us our money and
14 we will leave.

15 Q. Did you tell him anything -- did you tell her
16 anything about whether or not she had no worry that if
17 she didn't want to do anything, that Mr. Epstein
18 wouldn't push her or ask her to do anything she wasn't
19 comfortable with?

20 A. I said just, I said do what you want. Do, you
21 know, be as comfortable as you want to be. I didn't
22 want to make her feel uncomfortable or she wouldn't go.

23 Q. Did you tell her that Mr. Epstein wouldn't ask
24 her to do anything that she wasn't comfortable doing?

25 A. I said, listen, he likes when you have your

1 shirt off and you have your panties off. I didn't say
2 anything about being -- how comfortable are you when
3 you're naked in front of a 50-year-old man? I didn't
4 say anything about her being comfortable, oh, you know,
5 just be comfortable, be comfortable naked, [REDACTED]. What do
6 you want me to say?

7 Q. Did you tell her anything about Mr. Epstein
8 not being an individual that would request her to do
9 anything that she wasn't comfortable doing?

10 A. No, I didn't say anything like that. I said,
11 I did say everything is going to be okay.

12 Q. You didn't say any words to the effect of --
13 because I don't want to attempt to quote exactly --
14 that, that Mr. Epstein never asks anybody to do anything
15 they don't want to do?

16 A. No, I just brought her there.

17 Q. -- or words to that effect?

18 A. No.

19 Q. Did you convey that message to her in any
20 manner before you took her there?

21 A. No. I said let's go. Don't worry. We're
22 going to make \$200. We'll be in and out.

23 Q. And in fact, Mr. Epstein never forced you to
24 do anything that you didn't agree to do, did he?

25 A. Nope, but we were -- you know, he pushed on

1 it. He pushed on us. Like if, for instance, when he
2 was on the table and his penis, he was, it was out. He
3 was naked. He would pull my hand towards -- this is his
4 penis. He would pull my hand towards his penis and say,
5 oh, just come on, come on. And I would be like no, no,
6 because I wasn't comfortable. I would say no.

7 Q. Do I understand your testimony from this
8 morning, you never touched his penis?

9 A. I never touched his penis, but he would pull
10 his hand, my hand towards his penis.

11 Q. And when you said you were uncomfortable, that
12 stopped?

13 A. Yeah.

14 Q. When you first went to Mr. Epstein's, the
15 first time you went, [REDACTED] was there -- I mean this
16 friend of yours, [REDACTED], was there with you?

17 A. Uh-huh. Yes.

18 Q. What did she tell you before you went there
19 about what Mr. Epstein was like?

20 A. She said, hey, there is a 50-year-old or
21 whatever old man on, in this huge, in this huge mansion
22 and we can make \$200. So, do you want to go? All we've
23 got to do is massage him. And I was very scared. And I
24 was, like, are you kidding me, like I am scared. But
25 she convinced me into doing it and I went there.

1 Q. Did she tell you anything to the effect that,
2 don't worry, Mr. Epstein will never ask you to do
3 something you're not comfortable doing?

4 A. She said don't worry, I will handle things.
5 She said don't worry. Just, you know, we're going to be
6 safe. She did say that we're going to be safe because I
7 was very concerned about that.

8 Q. What did she mean by --

9 MR. EDWARDS: Object to the form.

10 BY MR. LUTTIER:

11 Q. -- when she said we're going to be safe?

12 MR. EDWARDS: Same objection.

13 THE WITNESS: That we're obviously not going
14 to get hurt.

15 BY MR. LUTTIER:

16 Q. Okay. And do you know -- what was she talking
17 about, physically harmed?

18 A. I guess that's the way interpreted it when I
19 was 13, sure.

20 Q. Did she say anything to the effect that you
21 won't have to do anything you don't want to do?

22 A. No. She just told me, go in there. Take my
23 shirt off. Take my pants off. He likes his legs
24 massaged, his arms, legs, back, scalp massaged, and he's
25 going to ejaculate. He is going to masturbate and

1 ejaculate, and then you get paid and you're out there.

2 Q. So, you knew all of that before you went the
3 first time?

4 A. Uh-huh, yes.

5 Q. And according to you, you were asked by her on
6 more than one occasion to go initially and you said no?

7 A. I said, I said no. I was scared, yes.

8 Q. Somehow you decided you weren't scared any
9 longer and you decided to go?

10 MR. EDWARDS: Object to the form.

11 BY MR. LUTTIER:

12 Q. Is that right?

13 A. Yes.

14 Q. When you went the first time, did you
15 voluntarily take your top off?

16 MR. EDWARDS: Object to the form.

17 THE WITNESS: He asked me -- no, because I
18 remember exactly what I was wearing. I was wearing
19 a red shirt that had like a half sleeve on it, and
20 some jeans. And I didn't know what the hell to do.
21 And he said, okay, girls, you guys can, you guys
22 can get undressed now.

23 BY MR. LUTTIER:

24 Q. So, you deny that you voluntarily took your
25 top off the first time?

1 A. I did not voluntarily take my top off the
2 first time.

3 Q. Did you ever tell any of your friends that you
4 had gone to Mr. Epstein's and voluntarily removed your
5 top?

6 A. Did I say that I --

7 Q. That you voluntarily, you went and took your
8 top off without even being asked?

9 A. Not the first time. The first time I did not
10 voluntarily do anything. He directed me.

11 Q. And [REDACTED] was standing right there with
12 you; is that right?

13 MR. EDWARDS: Objection to the form.

14 MR. LUTTIER: I mean [REDACTED]

15 THE WITNESS: No, [REDACTED] was not --

16 MR. LUTTIER: Wait, [REDACTED] whatever --

17 THE WITNESS: Get your story straight.

18 MR. LUTTIER: Whatever the last name was.

19 [REDACTED] was there --

20 THE WITNESS: [REDACTED] was sitting there next
21 to me and then she left the room and she said just
22 listen to Jeffrey. He will tell you what to do.

23 BY MR. LUTTIER:

24 Q. You mentioned earlier today that on the cover
25 of these books that you kept, these diaries, there was a

1 Bible verse. Were these books that you kept books that
2 were acquired with the Bible verse on it, or was this
3 something you put on it?

4 A. It was there already.

5 Q. Was this a book that you got from some
6 religious place?

7 A. Yes.

8 Q. Where did you get the book?

9 A. I don't recall.

10 Q. Did you buy the book or did you get it some
11 other way?

12 A. I bought the book.

13 Q. And what verse was on the cover?

14 A. Psalms something.

15 Q. What Psalm?

16 A. I don't know.

17 Q. You don't remember?

18 A. No.

19 Q. Do you remember where you bought it?

20 A. No.

21 Q. Do you remember why you bought it?

22 A. To keep a journal.

23 Q. A journal of what?

24 A. Of my life.

25 Q. So when did you start this book?

1 A. When I started making a lot of money.
 2 Q. Which was when?
 3 A. When I started working in [REDACTED]
 4 Q. What do you mean by [REDACTED]?
 5 A. I told you this before, [REDACTED] places where
 6 men go to receive sexual favors.
 7 Q. This was after you had gone to Mr. Epstein?
 8 A. Yes.
 9 Q. This was after you had quit going to
 10 Mr. Epstein, wasn't it?
 11 A. Yes.
 12 MR. EDWARDS: Objection to the form. Just for
 13 clarification, do you mean after she quit going the
 14 first time or after --
 15 MR. LUTTIER: No.
 16 MR. EDWARDS: -- the last time, the last time
 17 she ever saw him?
 18 MR. LUTTIER: No, period. She knew what I
 19 meant. After she quit going to Epstein's.
 20 BY MR. LUTTIER:
 21 Q. And is there some particular reason why you
 22 purchased this particular book with this particular
 23 verse on it to do this?
 24 A. No.
 25 Q. You have no recollection at all where you got

1 this book?
 2 A. No.
 3 Q. But you know you bought it?
 4 A. Yes.
 5 Q. And do you, can you recite any of this verse
 6 that you say is on it?
 7 A. No.
 8 Q. I mean Psalms is kind of a big book?
 9 A. Correct.
 10 Q. And you can't remember anything about what it
 11 is?
 12 A. No. It said the verse. It said Psalms
 13 something, something. It didn't say, literally say the
 14 verse.
 15 Q. The verse wasn't printed out.
 16 A. No.
 17 Q. It was just a citation to a verse in the book
 18 of Psalms?
 19 A. Yes.
 20 Q. And you never looked up the verse to see what
 21 it was?
 22 A. No.
 23 Q. From the time you first began keeping that
 24 book, did you continue to keep that book right through
 25 the present time?

1 A. Until now?
 2 Q. Yes.
 3 A. It's somewhere. I don't know. It's
 4 somewhere. I mean --
 5 Q. You have already testified earlier this
 6 morning that you had it and you knew where it was, so --
 7 MR. EDWARDS: Object to the form.
 8 THE WITNESS: Okay. Well, it's somewhere in
 9 the house.
 10 MR. LUTTIER: Okay.
 11 THE WITNESS: I don't know if it's in the damn
 12 kitchen or in the -- you need to -- you're making
 13 me angry. I don't know, just the way you're
 14 looking at me, the way he is looking at me, staring
 15 at me like I'm the criminal.
 16 MR. LUTTIER: Ma'am -- move to strike.
 17 THE WITNESS: I guess that's what you get paid
 18 for. I'm sorry.
 19 MR. LUTTIER: Move to strike the soliloquy.
 20 BY MR. LUTTIER:
 21 Q. When was the last time you made an entry in
 22 that book?
 23 A. Oh, I believe I only had it for the year of
 24 [REDACTED] And the last time I ever opened it and made an
 25 entry in it was probably in [REDACTED]

1 Q. Did you describe in that book events that
 2 happened in your life that you thought were of
 3 significance?
 4 A. No. I kind of lived a second life so I would
 5 never do that.
 6 Q. What do you mean you lived a second life?
 7 A. Well, I lived a life as a prostitute, and I
 8 lived a life as a mother as well, so --
 9 Q. So, how does that relate to my question about
 10 whether or not you --
 11 A. You asked me how did I live a second life. I
 12 am mother when I go home. I am a prostitute when I make
 13 money. That's like two different lives. Okay. So I
 14 kept one secret from the other.
 15 Q. Well, then my question was did you record in
 16 the book significant events that occurred in your life?
 17 A. Significant events, like what is significant
 18 to you?
 19 Q. Well, since you're the one putting the entries
 20 in the book, I guess you would make that determination.
 21 A. The answer is no.
 22 Q. Did you record any events that occurred to you
 23 in your life in that book?
 24 A. Yes.
 25 Q. What events did you record?

MR. EDWARDS: Don't answer. We're invoking her Fifth Amendment right to remain silent. If you want, she will read it. In addition she's in, we are resting on our privacy rights objection as well as the objection to privacy of third parties. Go ahead.

THE WITNESS: On advice of counsel, I invoke the Fifth Amendment rights under the United States Constitution.

BY MR. LUTTIER:

Q. You earlier said that in the year [REDACTED] some days you made a thousand dollars a day, some days you made \$2,000 a day. How many days out of the year would you say you made a thousand dollars a day or more in the year [REDACTED]?

A. I don't know.

Q. Well, what's your best approximation?

MR. EDWARDS: Object to the form.

THE WITNESS: I don't know.

BY MR. LUTTIER:

Q. More than 50?

A. I don't know, sir.

Q. More than 100?

A. I don't know, sir.

Q. And this is -- these are events that would

have happened less than 12 months ago, but you, as you sit here today, your recollection is not good enough for you to answer that; is that correct?

MR. EDWARDS: Object to the form. If you know, tell him. I don't want you to guess.

THE WITNESS: I'm not guessing.

BY MR. LUTTIER:

Q. I'm not asking you to guess. Don't want you to guess. Tell me what your best estimate is.

MR. EDWARDS: That's the same thing as guessing and I am instructing her not to guess. If you know, tell him though. If you do not know, don't. Object to the form.

MR. LUTTIER: Let's not have speaking objections.

MR. EDWARDS: I apologize.

BY MR. LUTTIER:

Q. Was it more than ten?

A. Maybe.

Q. More than 20?

A. Maybe.

Q. And by then, by when you made like \$2,000 in a day, how many hours are you referring to as a day?

MR. EDWARDS: Object to the form. The question dealt with \$1,000 a day. And now this

question has turned into \$2,000 a day.

BY MR. LUTTIER:

Q. If you made more than \$1,000 in a day, how many hours are you referring to as a day?

A. Sometimes it could be 30 minutes. Sometimes it could be 24 hours.

Q. When you say it was 24 hours, that suggests to me that your workday involved you keeping the company of someone for an entire 24-hour period; is that right?

A. Sometimes.

Q. And did you do that in town or did you travel to do that?

A. In town and travel.

Q. Did you ever engage in any of those activities with any of the girls that you had come to know from either taking them to Mr. Epstein's or knowing them from Mr. Epstein's?

MR. EDWARDS: Don't answer. And I am invoking -- I am objecting based on privacy rights of [REDACTED] as well as these third parties you are referring to, and as well as the Fifth Amendment. She will read.

THE WITNESS: On advice of counsel, I invoke my Fifth Amendment rights under the United States Constitution.

THE VIDEOGRAPHER: Excuse me. You're microphone got turned inside out here.

BY MR. LUTTIER:

Q. Before lunch you testified that you would sit naked in front of Mr. Epstein. Do you recall that testimony?

A. Yes.

Q. Is this, was this the first occasion that you went to see Mr. Epstein?

A. Where I sat in front of him naked?

Q. Uh-huh.

A. No. The first occasion when I saw Jeffrey, I stood in front of him naked.

Q. Okay. And did each time that you went to see Mr. Epstein or you went to his house, did you actually go into a room and perform massages with Mr. Epstein?

A. Yes.

Q. Were there occasions when you went to his house and you didn't perform massages on Mr. Epstein?

A. Yes.

Q. And what occasions were those?

A. When I was bringing another girl to perform massage on Mr. Jeffrey Epstein.

Q. Did there come a time that, that Mr. Epstein didn't, or that you didn't perform massage on

1 Mr. Epstein?

2 A. No, that was the whole point.

3 Q. So, you performed massages on Mr. Epstein
4 right up until when?

5 A. I performed?

6 Q. That's what I asked, yeah.

7 A. He didn't like anybody pregnant. So, I had to
8 stop seeing Mr. Jeffrey Epstein after I had my son.

9 Q. Well, after you had your son, you wouldn't
10 have been pregnant, right?

11 A. He didn't want women or girls -- sorry, he
12 didn't want girls that had a kid at all. That was a big
13 no-no --

14 Q. Well, so --

15 A. -- in his book.

16 Q. So, is it your testimony that while you were
17 pregnant you went to Mr. Epstein's and performed
18 massages?

19 A. When I was pregnant, I brought girls to
20 Jeffrey Epstein's house to perform sexual acts.

21 Q. Did you perform massages on Mr. Epstein while
22 you were pregnant?

23 A. No.

24 Q. So, do you remember when you got pregnant?

25 A. Yeah.

1 Q. When was that approximately?

2 A. That was like [REDACTED] after [REDACTED]

3 Q. So that's --

4 A. So [REDACTED]

5 Q. [REDACTED] of --

6 A. [REDACTED]

7 Q. Of what, [REDACTED]?

8 A. [REDACTED], yeah.

9 Q. Okay. So, from [REDACTED], and when do you
10 say was the last time you went to Mr. Epstein's?

11 A. I personally like went there?

12 Q. Yeah.

13 A. Just even if I brought a girl?

14 Q. Right.

15 A. I brought, I brought girls there after I was,
16 after I had my son. So, I was 17 the last time I went
17 to Jeffrey's house.

18 Q. My question was when was the last time you
19 went?

20 A. I was 17.

21 Q. Well, you're 17 for 12 months. When was the
22 last time you went?

23 A. Well, [REDACTED].

24 Q. Of what year?

25 A. Whatever year I was 17.

1 Q. What year was that?

2 A. I don't know, sir. I told you I am bad with
3 math, and I am not going to do the math. So you can sit
4 there and do the math. I was born in [REDACTED]. When I was
5 17 in [REDACTED] or [REDACTED] area, that's the last time I
6 saw Jeffrey Epstein. That's the last time I entered his
7 mansion.

8 Q. The fact of the matter is you don't know when
9 the last time was that you went, do you?

10 A. I don't know the specific date or the month or
11 the day, no, I don't. But I know I was damn sure 17.

12 And I know my son was [REDACTED]

13 [REDACTED]
14 Q. Between [REDACTED] when you got [REDACTED]
15 and when you claim you went for the last time, did you
16 not perform any massages during that period?

17 A. No.

18 MR. EDWARDS: Object to the form.

19 MR. LUTTIER: No, meaning --

20 THE WITNESS: He doesn't like pregnant girls.

21 He doesn't like girls who have had babies.

22 BY MR. LUTTIER:

23 Q. Okay. So the period of time over which,
24 according to you, you performed any massages for
25 Mr. Epstein was sometime in late [REDACTED] until [REDACTED]

1 [REDACTED]?

2 MR. EDWARDS: Object to the form.

3 MR. LUTTIER: Is that right?

4 THE WITNESS: When I performed sexual favors
5 for him?

6 MR. LUTTIER: Massages or whatever you did.

7 THE WITNESS: Yes.

8 BY MR. LUTTIER:

9 Q. The first time you went was sometime in the
10 summer of [REDACTED], according to you; is that right?

11 A. Yes.

12 Q. And between the summer of [REDACTED] and [REDACTED]
13 [REDACTED], you can't tell us how many times you went, right?

14 A. Oh, I can definitely tell you it was over --
15 I, I personally went over 50, over 60, over 70 times.

16 Q. Well, which is it 50, 60, or 70?

17 A. I would say 70.

18 Q. All right. And what's that based on?

19 A. That's based on the girls that I brought. I
20 know that I brought over 70 girls.

21 Q. It's now 70 girls that you brought. Have you
22 ever --

23 A. I have brought many, many, many girls.

24 Q. Have you looked at your answers to
25 interrogatories to see what you said under oath about

1 the number of girls that you brought?

2 A. What, at the last whatever it was? What is
3 this called?

4 Q. Your number keeps getting higher as the case
5 goes on, doesn't it?

6 A. Sir, are you talking about the last -- what is
7 it called -- deposition that I took for Jeffrey?

8 Q. No, I am talking about your answers to
9 interrogatories.

10 A. What's my answers -- I don't know any of these
11 slick words that you guys use as attorneys, so can you
12 please explain to me in like --

13 Q. These would be the things that you signed
14 under other as being true. You, you would pay attention
15 to a document if you were signing it under oath,
16 wouldn't you, to make sure it was true?

17 A. Yeah, but if it's in fear for my son, I will
18 do anything I can.

19 Q. Well, while you have been represented by
20 Mr. Edwards, you haven't had an fear for your son, have
21 you?

22 A. Brad Edwards, no, I have not had any fear of
23 my son.

24 Q. So, anything you have signed since you have
25 been represented by Mr. Edwards under oath is something

1 that you carefully looked at?

2 A. Carefully.

3 Q. And made sure it was true?

4 A. Yeah.

5 Q. And you told the whole truth?

6 A. Whole truth, nothing but the truth.

7 Q. Nothing but the truth.

8 A. So help me God.

9 Q. Didn't omit, didn't omit anything, right?

10 A. I didn't leave anything out.

11 Q. Okay. Now, do you have any record of how many
12 times you went?

13 A. No. But at one point in time I did, and I
14 don't have that anymore. But I used to keep lists and
15 lists of girls and I would just go in order.

16 Q. Have you ever told anybody before today that
17 you ever kept a record of how many times you went to
18 Mr. Epstein's?

19 A. Yes.

20 Q. Who did you tell?

21 A. I have told many people.

22 Q. Who?

23 A. I have told [REDACTED].

24 Q. Okay. Who else?

25 A. I have told. I have told my mother, and I

1 don't know. When the discussion comes up and they see
2 him on the news, you know, I have told a couple of
3 people. I can't recall their names.

4 Q. You don't know -- I have got [REDACTED], and your
5 mother. Who else did you tell that you kept a list of
6 how many times you went to Mr. Epstein's?

7 A. I can't recall. Maybe you can ask
8 Mr. Epstein. He would know.

9 Q. No, we're talking about the list you said you
10 kept. And my question is --

11 A. Oh, sorry.

12 Q. -- how many people you told you kept the list
13 of the number of times you went to Mr. Epstein's. So
14 far you told me [REDACTED], and your mother. Who else?

15 A. I can't recall.

16 Q. You can't recall anybody else?

17 A. No, I'm sorry.

18 Q. How about dad? Did you tell dad?

19 A. No, I didn't tell my father.

20 Q. How about other friends of yours?

21 A. Yeah, but I can't recall who --

22 Q. Can't recall anybody?

23 A. Who -- I mean, it really was like, it was like
24 irrelevant. You know, okay, I brought over 60, 70 girls
25 there.

1 Q. What happened to this list that you kept of
2 the number of times that you went to Mr. Epstein's?

3 A. It's misplaced. I have no idea where it is.

4 Q. What do you mean by misplaced?

5 A. I wish I knew where it was so I could get all
6 those little girls justice. Sorry. I don't know.
7 Misplaced, do you know the definition of misplaced?

8 Q. No, but I want you to define it. What do you
9 mean by misplaced?

10 A. Misplaced, that means like, you know, when you
11 lose stuff, like, oh, my God, I accidentally lost this
12 paper. You know.

13 Q. And do I understand there were two lists. One
14 was the number of times you went to Mr. Epstein's and a
15 second list was a list of the names of the people that
16 you took?

17 A. No, it was specifically the girls and the
18 girls' numbers, and there was many, many, many girls on
19 there.

20 Q. So, it was a list of names and phone numbers?

21 A. Yes.

22 Q. Didn't reflect the number of times that you
23 took these people?

24 A. I took each girl there over that many times,
25 over -- I took each girl either once or twice, or if he

1 really liked them, I took them three times. But I took
2 each girl. If I had a, if I had a notepad of 85 girls,
3 I took those girls. Those were the girls that I have
4 took. So, when I was done with those 85, I could call
5 the first one up and say, hey, do you want to go to
6 Jeffrey's; he needs to see a new vagina.

7 Q. The -- is that what you told him? You called
8 them and told them, before you took them, do you want to
9 go to Jeffrey's; he needs to see a new vagina? Is that
10 what you told them?

11 MR. EDWARDS: Object to form.

12 THE WITNESS: I told them, hey, he wants to
13 see a new face. He doesn't like seeing the same
14 little girl every day.

15 BY MR. LUTTIER:

16 Q. Well, did you tell them that he wanted to see
17 a face or wanted to see a vagina?

18 A. I said face.

19 Q. So, you misspoke earlier when you said that
20 what you told him was he wants to see a new vagina?

21 A. I didn't misspeak or spoke at all. They knew
22 what he wanted to see. They didn't just go there and
23 say, hey, I am here, Jeffrey Epstein. They took their
24 fucking pants off, and they said, here, pay me \$200.

25 Q. So, every girl, your testimony is every girl

1 that you took there knew exactly what was going to
2 occur?

3 A. Some didn't because I, I would lie to them and
4 I would say, hey, you know, he is not really going to do
5 anything. You don't really need to take your clothes
6 off, you know, just to get them there. But once they
7 were there, they were scared out of their mind. They
8 did it anyways and some of them walked out. Some of
9 them did it, did the action and walked out and said [REDACTED],
10 don't ever do this to me again. That was the worst
11 thing that ever happened in my life.

12 Q. Have you ever told anybody prior to today that
13 anyone you took there ever said such things to you?

14 A. Yes.

15 Q. Who have you told that to?

16 A. I have told them to --

17 MR. EDWARDS: Objection, attorney-client
18 privilege.

19 BY MR. LUTTIER:

20 Q. Other than your lawyer, who have you made that
21 statement to?

22 A. I have made it to many of the girls. All the
23 girls who I have brought, I would get on the phone with
24 them, and I would say, hey, so-and-so, you know, never
25 wanted to go again. She had a really bad experience.

1 She's not as comfortable as others are.

2 Q. So, you would call another girl on your list
3 and specifically tell her not only what was going to
4 happen, but you would tell her that someone before her
5 had gone and wasn't comfortable?

6 MR. EDWARDS: Object to the form.

7 BY MR. LUTTIER:

8 Q. Right?

9 A. No.

10 MR. EDWARDS: Object to the form.

11 THE WITNESS: I would say -- I would call -- I
12 knew the girls who were comfortable. And then a
13 lot of girls weren't comfortable.

14 BY MR. LUTTIER:

15 Q. Well, how did you know who was comfortable?

16 A. Because when they went, they would tell me.

17 Q. Oh, so, some of the girls came and they
18 specifically told you they were comfortable with
19 whatever occurred; is that right?

20 A. They didn't tell me they were comfortable.

21 MR. EDWARDS: Object to the form.

22 THE WITNESS: They said, you know --

23 BY MR. LUTTIER:

24 Q. But you just told me that.

25 A. I can maybe do this again, but the thing is is

1 that Jeffrey didn't like seeing the same girl again.

2 Q. Well, wait a minute.

3 A. He wanted to see one girl.

4 Q. Wait a minute. You just said, and I can have
5 her go back and read it.

6 A. Okay. Go ahead.

7 Q. But you just said that the way you knew they
8 were comfortable was they told you they were
9 comfortable. Is that a true statement?

10 A. They were -- yeah, they were more --

11 Q. It is a true statement?

12 A. Yes.

13 Q. Okay. Which ones told you after they went
14 there that they were comfortable?

15 A. Couple of them. I can't name their names.

16 Q. Okay. Well, you said you referred to a list
17 of 85 people, and so I am sure you can remember some
18 names for us. Which ones --

19 MR. EDWARDS: Object to the form.

20 MR. LUTTIER: -- told you they were

21 comfortable.

22 THE WITNESS: My attorney knows some names.

23 MR. EDWARDS: Object to the form.

24 BY MR. LUTTIER:

25 Q. Which ones told you they were comfortable?

1 A. Obviously [REDACTED] She was comfortable because
2 she went there a couple more times.

3 Q. Did you say a couple more times?

4 A. Actually --

5 Q. Is that what you said, a couple?

6 A. She went there many times. I don't know --

7 Q. Did I hear you say that she said she went
8 there a couple of times?

9 MR. EDWARDS: Object to the form,
10 argumentative. If you want to describe what you
11 mean --

12 THE WITNESS: A lot of these girls --

13 MR. EDWARDS: -- say it.

14 THE WITNESS: Listen, all of these little
15 girls, we weren't like so comfortable, like, yeah,
16 let me go take my clothes off in front of a
17 50-year-old pervert. No, they weren't comfortable.
18 They just dealt with it so they could get \$200 in
19 their pocket.

20 BY MR. LUTTIER:

21 Q. Well, did you -- unless I misunderstood what
22 you said, you just got done testifying that these girls
23 told you they were comfortable?

24 A. You are being slick right now. You know what,
25 when I say comfortable, you know I am not saying that a

1 13, 14, 15 year old girl is saying, oh, I'm so
2 comfortable, let me just take my damn clothes off in
3 front of a 50-year-old man.

4 Q. Well, in fact, you have told others
5 specifically that you were comfortable with everything.

6 A. You're a good attorney, I will tell you.

7 Q. Isn't that right?

8 A. You're a joke.

9 Q. Haven't you told others, specifically --

10 A. Specifically, okay, I will tell you --

11 Q. That you were comfortable -- well, let me
12 finish --

13 A. -- the conversation.

14 THE COURT REPORTER: One at a time.

15 BY MR. LUTTIER:

16 Q. One at a time. You have specifically told
17 others that you were comfortable with everything that
18 happened between you and Jeff Epstein, haven't you?

19 A. I said when I would get on the phone with
20 them --

21 Q. Yes or no.

22 A. When I would get on the phone with them--

23 Q. Yes or no.

24 A. I would say, hey.

25 MR. LUTTIER: Move to strike.

1 THE WITNESS: You know, this girl, she did not
2 feel, she did not feel comfortable doing this. Or
3 I would say, yeah, you know, she felt okay with it.
4 She'll go again because, you know, she can make
5 \$200. But the point is, is that Jeffrey didn't see
6 girls. He only saw certain girls over and over and
7 over again. Okay. He didn't care to see the same
8 girl a second time. He only wanted to see a little
9 girl one time, and he was --

10 MR. LUTTIER: Move --

11 THE WITNESS: -- happy and fun with it.

12 MR. LUTTIER: Move to strike as not
13 responsive. Would you read back the question that
14 I asked her.

15 And would you listen carefully and answer my
16 question, please.

17 THE WITNESS: You're disgusting.

18 MR. EDWARDS: [REDACTED]

19 THE WITNESS: Absolutely.

20 MR. EDWARDS: Try to answer his question. If
21 you need to elaborate, you can, but answer the
22 question.

23 THE WITNESS: I hope your daughter -- I hope
24 you have -- do you have a daughter? If you do --

25 MR. LUTTIER: I am not being deposed.

1 THE WITNESS: If you do, I hope that she finds
2 out exactly what you are doing and who you are
3 defending later on in life.

4 MR. LUTTIER: That would be unprofessional for
5 me to respond to your remarks.

6 THE WITNESS: It's unprofessional for you to
7 do this --

8 MR. LUTTIER: I don't --

9 THE WITNESS: -- actually, and moral-wise.

10 MR. LUTTIER: I don't, I don't take offense
11 with anything you say.

12 THE WITNESS: I know you don't, because you're
13 just making money sitting on your ass sticking up
14 for, sticking up for a child molester. What a good
15 man you are.

16 (The requested portion of the record was read
17 by the reporter.)

18 THE WITNESS: Yes.

19 BY MR. LUTTIER:

20 Q. How many people have you told --

21 A. I don't know.

22 Q. -- that you were comfortable? More than ten,
23 isn't it?

24 A. No.

25 Q. What did you tell your mother about it?

1 A. I told her that, actually, I really truthfully
2 did not tell her anything. She doesn't know anything.
3 I would keep stuff from her.

4 Q. Let me see if I, if I understand your answer.
5 Are you telling us that as you sit here today, your
6 mother doesn't know anything about you going to
7 Mr. Epstein's?

8 A. Yeah, especially after the fact. After the
9 fact, she does.

10 Q. Listen to my question. Are you telling us as
11 you sit here today that your mother doesn't know
12 anything about you going to Mr. Epstein's?

13 MR. EDWARDS: Does or doesn't?

14 MR. LUTTIER: Does not know anything about you
15 going to Mr. Epstein.

16 THE WITNESS: Yes, she does.

17 BY MR. LUTTIER:

18 Q. As a matter of fact she's told you people have
19 come and talked to her about it, hasn't she?

20 A. Yeah. This is after the fact, after I haven't
21 saw just Jeffrey when I was 17.

22 Q. And do you recall when your mother first told
23 you that people had come to talk to her about you going
24 to see Jeff Epstein?

25 A. Yeah, I remember. She called me July 27th of

1 '09 and said, hey, by the way, a couple of investigators
2 came by my house and asked if she knew anything.

3 Q. Well, what specifically did she tell you?

4 A. I just told you.

5 Q. Just said, just couple investigators came by
6 and asked what, if she knew anything?

7 A. Yes.

8 Q. Anything about what?

9 A. About the -- about Jeffrey Epstein. Are you
10 kidding me?

11 Q. What did you tell her?

12 A. I said, okay. What did you say. She's like
13 nothing because I don't know.

14 Q. And that's, that's all she told you?

15 A. Yes.

16 Q. Did she tell you anything else about what she
17 told the people that came by to see her?

18 A. No.

19 Q. Did she tell you anything about what she told
20 them about you and her relationship?

21 A. No. Well, she said, actually she said I told
22 them that we don't really talk.

23 Q. That is your mom told you that she had told
24 these investigators that you and she don't talk?

25 A. Yes.

1 Q. Did your mom tell you anything else that she
2 told them about your background?

3 A. Nope.

4 Q. By the way, what's your current relationship
5 with your mom like?

6 A. It's fine.

7 Q. When you mean fine, what do you mean?

8 A. It's positive.

9 Q. Would you characterize it as a good
10 relationship?

11 A. Yes. It's positive.

12 Q. Okay. Has it always been positive?

13 A. No.

14 Q. And when wasn't it positive?

15 A. I think we went over this before when I
16 started getting into drugs when I was 14 years old.

17 Q. And the drugs that you're talking about is
18 what this [REDACTED] gave you when you went to
19 Mr. Epstein's?

20 A. Yes, and then it escalated.

21 Q. And, and you started to take drugs at times
22 other than when [REDACTED] was taking you to Mr. Epstein's,
23 correct?

24 A. Correct.

25 Q. And describe for us the escalation of your

1 drug use after the first trip that you took to
2 Mr. Epstein's.

3 A. Well, after seeing Jeffrey so many times and
4 getting on a buzz of a pill, you start getting addicted
5 to that one pill so --

6 Q. These are pills that [REDACTED] gave you?

7 A. [REDACTED] gave me some pills and then I, and
8 then I got pills from other people.

9 Q. From who?

10 A. From people on the street.

11 Q. Like who?

12 A. Do I know their name? No, I don't.

13 Q. Well, you got them from friends of yours,
14 didn't you?

15 A. No, it was, no, it was not a friend.

16 Q. Where did you go to get these pills?

17 A. On the street.

18 Q. Where on the street? Did you drive down
19 [REDACTED] and buy them or where did you go?

20 A. Something like that.

21 Q. Is that where you want?

22 A. No, not [REDACTED].

23 Q. Okay. And how were you getting to the street
24 where you were buying these pills?

25 A. Walking.

- 1 Q. So, you would walk where to buy pills?
 2 A. Down the street.
 3 Q. I mean, are you talking about over by your,
 4 the [REDACTED] where, [REDACTED] where you were
 5 living?
 6 A. Yeah, Uh-huh.
 7 Q. Or are you talking about someplace else?
 8 A. Yes.
 9 Q. And who else would go with you when you were
 10 out walking the streets to buy pills?
 11 A. [REDACTED], actually.
 12 Q. And would both of you buy pills?
 13 A. Yeah.
 14 Q. And what kind of pills were you asking for?
 15 A. Percocets, Lorcets, Valiums, Xanax, Soma, or
 16 whatever they are called, Somas.
 17 Q. Any others?
 18 A. Not that I recall. For extra, extra fun we
 19 would ask for some coke or some ecstasy or --
 20 Q. Now, when you first went to Mr. Epstein's, I
 21 think you described the summer of '02, were you enrolled
 22 in school?
 23 A. It was the summer, so I don't think I had been
 24 enrolled.
 25 Q. So I mean, let's say it was the summer of '02.

- 1 So it would be the '02-'03 school year?
 2 A. Yes.
 3 Q. And that would have been at [REDACTED]
 4 or at [REDACTED]?
 5 A. [REDACTED].
 6 Q. Okay. Did there come a time that you quit
 7 going to school?
 8 A. Yes.
 9 Q. When was that?
 10 A. When I was around [REDACTED] pregnant.
 11 Q. Is, is that the reason you quit going is
 12 because you were pregnant?
 13 A. That was some of the reason.
 14 Q. I mean, I assume that you didn't want to be in
 15 school when it would begin to show that you were
 16 pregnant?
 17 A. No, it wasn't embarrassing to me.
 18 Q. Okay. Well, what other -- other than the fact
 19 that you were pregnant, what were the other reasons why
 20 you quit going to school?
 21 A. I felt I needed to make money for the baby.
 22 Q. Well, you knew who the dad was, right?
 23 A. Yeah.
 24 Q. Were you living with your mother or your
 25 father at the time that you became pregnant?

- 1 A. No.
 2 Q. You weren't living with either one?
 3 A. No.
 4 Q. Who were you living with?
 5 A. I was living with my son's father.
 6 Q. Who is?
 7 A. [REDACTED].
 8 Q. Were you living with [REDACTED] before you
 9 got pregnant?
 10 A. No.
 11 Q. You only began living with him after you found
 12 out that you were pregnant?
 13 A. Yes.
 14 Q. Had you lived away from your home prior to the
 15 time you got pregnant?
 16 A. No. I was always at my mother's or father's
 17 house.
 18 Q. So, up until the time that you found out you
 19 were pregnant, you had always been living at either
 20 mom's or your dad's?
 21 A. Yes.
 22 Q. Is there a reason why you quit living at mom's
 23 or dad's once you found out you were pregnant?
 24 A. Yes, because when you find out you're
 25 pregnant, you naturally want to try to make a family and

- 1 live with your son's father.
 2 Q. Did either your mother or father tell you you
 3 couldn't live, continue to live with them because you
 4 were pregnant?
 5 A. No.
 6 Q. So, you had the choice to just stay with one
 7 of your folks?
 8 A. Yes.
 9 Q. Do you remember which one you were living with
 10 at the time?
 11 A. My father.
 12 Q. Okay. So, your father didn't kick you out or
 13 anything like that?
 14 A. No.
 15 Q. Did there come a time ever in your life when
 16 you, you were living with your dad that you ran away?
 17 A. No. If there was an argument, I went to my
 18 mother's house.
 19 Q. Did there ever come a time that you, you left
 20 your father's house and left a note for him telling him
 21 you weren't coming back?
 22 A. No.
 23 Q. Ever a time that your father had to report you
 24 as missing, for example?
 25 A. No.

1 Q. If any of these things had happened, those,
2 would you agree with me that would have been a traumatic
3 event in your life?

4 MR. EDWARDS: Object to the form. Object to
5 lack of predicate.

6 THE WITNESS: Yeah, if I ran away, I think
7 that would be traumatic.

8 BY MR. LUTTIER:

9 Q. Did you ever ask either your mother or your
10 father or tell them that you wanted to be emancipated?

11 A. No, no. I -- but there was an issue when I
12 needed to get my license when I did have [REDACTED], and I was
13 trying to figure out a way around that, because they
14 weren't going to allow me to get my license unless I was
15 enrolled in school since I was 16. And we did talk
16 about that, but it never went through. We never really
17 were specific or on top of the subject.

18 Q. So, now you're talking about some incident
19 that happened after [REDACTED]?

20 A. Yeah, I wanted to get my license.

21 Q. But before [REDACTED], I am talking about now before
22 [REDACTED] was there ever a time that you expressed
23 a desire to your mother or your father or anyone else
24 that you wanted to be emancipated?

25 A. No.

1 Q. Do you know what emancipated means?

2 A. Yes.

3 Q. And what does it mean?

4 A. It means that you want to be your own adult.

5 Q. And you don't recall ever doing that?

6 MR. EDWARDS: Object to the form, asked and
7 answered.

8 THE WITNESS: No.

9 BY MR. LUTTIER:

10 Q. Okay. So, once you find out you're pregnant,
11 you decide you're going to move in with [REDACTED]?

12 A. Right.

13 Q. Now, and that would be sometime after
14 [REDACTED]. I think we just discussed before,
15 around [REDACTED] is when you became
16 pregnant?

17 A. Yes.

18 Q. And you lived with [REDACTED] then from
19 somewhere around [REDACTED] to what point in
20 time?

21 A. We ended up buying a [REDACTED] with a lot of the
22 money I saved up from Jeffrey. We fixed it up and he,
23 Jeffrey actually threw my [REDACTED]. He had [REDACTED]
24 come over with a whole bunch of gifts, and we lived in
25 that [REDACTED]. We were together since, until my son

1 [REDACTED]
2 Q. Which is -- was he born sometime around [REDACTED]?

3 A. [REDACTED]

4 Q. Of?

5 A. [REDACTED]

6 Q. Okay. So, you and [REDACTED] were together
7 until about [REDACTED]?

8 A. If that's --

9 Q. [REDACTED] --

10 A. The correct math.

11 Q. [REDACTED] [REDACTED]?

12 A. If that's the correct math.

13 Q. [REDACTED] Why did
14 you and [REDACTED] --

15 A. [REDACTED]

16 MR. EDWARDS: Object to the form.

17 BY MR. LUTTIER:

18 Q. [REDACTED]. I am sorry. You said it was
19 for [REDACTED], when [REDACTED] was about [REDACTED]?

20 A. Yes.

21 Q. All right. Then my math would be wrong, and
22 that would take us until [REDACTED].

23 A. Okay.

24 Q. And then did you and [REDACTED] --

25 A. It was [REDACTED].

1 Q. Okay. [REDACTED]. Is there an event that
2 you can recall that helps you focus on that date?

3 A. My [REDACTED].

4 Q. So, you and [REDACTED] lived in this [REDACTED]
5 that you had purchased until around [REDACTED]?

6 A. Yes.

7 Q. And when you say you purchased it, was it
8 purchased in your name, his name, joint names?

9 A. My [REDACTED].

10 Q. Oh, it was in [REDACTED] name?

11 A. Yes.

12 Q. Was there a reason why it went in [REDACTED]
13 name as opposed to your name?

14 A. I was 16.

15 Q. Did you provide the money?

16 A. I provided the money to fix up the place. I
17 am, I ended up paying him back after when we sold it,
18 but no, he paid for it.

19 Q. That is he being [REDACTED]?

20 A. Yes.

21 Q. And ballpark how much money did you spend
22 fixing it up?

23 A. Three grand, ballpark.

24 Q. Okay. And why --

25 MR. GOLDBERGER: Excuse me, Mark, do you mind

1 if we take a little break?

2 MR. LUTTIER: No.

3 THE VIDEOGRAPHER: Off the record. Time is
4 approximately 2:52 p.m.

5 (A brief recess was held.)

6 * * * *