

# EXHIBIT 1

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<p>UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA</p> <p>CASE NO. 08-CIV-80119-MARRA/JOHNSON</p> <p>JANE DOE NO. 2, Plaintiff, -vs- VOLUME I OF III JEFFREY EPSTEIN, Defendant.</p> <hr/> <p>Related cases: 08-80232, 08-08380, 08-80381, 08-80994 08-80993, 08-80811, 08-80893, 09-80469 09-80591, 09-80656, 09-80802, 09-81092</p> <hr/> <p>VIDEOTAPED DEPOSITION OF SARAH KELLEN</p> <p>Wednesday, March 24, 2010 10:37 - 6:51 p.m.</p> <p>250 Australian Avenue South Suite 1500 West Palm Beach, Florida 33401</p> <p>Reported By: Cynthia Hopkins, RPR, FPR Notary Public, State of Florida Prose Court Reporting Services Job No.: 1484</p>	<p>1 IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT 2 IN AND FOR PALM BEACH COUNTY, FLORIDA 3 CASE NO. 502008CA028051XXXXMB AB</p> <p>4 L.M., 5 Plaintiff, 6 -vs- VOLUME I OF III 7 JEFFREY EPSTEIN, 8 Defendant.</p> <hr/> <p>10 11 12 VIDEOTAPED DEPOSITION OF 13 SARAH KELLEN 14 15 Wednesday, March 24, 2010 16 10:37 - 6:51 p.m. 17 18 250 Australian Avenue South 19 Suite 1500 20 West Palm Beach, Florida 33401 21 22 Reported By: 23 Cynthia Hopkins, RPR, FPR 24 Notary Public, State of Florida 25 Prose Court Reporting Services Job No.: 1484</p>
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<p>1 IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT 2 IN AND FOR PALM BEACH COUNTY, FLORIDA 3 CASE NO. 502008CA028058XXXXMB AD</p> <p>4 E.W., 5 Plaintiff, 6 -vs- VOLUME I OF III 7 JEFFREY EPSTEIN, 8 Defendant.</p> <hr/> <p>10 VIDEOTAPED DEPOSITION OF 11 SARAH KELLEN 12 13 Wednesday, March 24, 2010 14 10:37 - 6:51 p.m. 15 16 250 Australian Avenue South 17 Suite 1500 18 West Palm Beach, Florida 33401 19 20 21 Reported By: 22 Cynthia Hopkins, RPR, FPR 23 Notary Public, State of Florida 24 Prose Court Reporting Services 25 Job No.: 1484</p>	<p>1 IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL 2 CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA 3 CASE No.502008CA037319XXXXMB AB</p> <p>4 B.B. 5 Plaintiff, 6 -vs- VOLUME I OF III 7 JEFFREY EPSTEIN 8 AND SARAH KELLEN, 9 Defendants.</p> <hr/> <p>10 VIDEOTAPED DEPOSITION OF 11 SARAH KELLEN 12 13 Wednesday, March 24, 2010 14 10:37 - 6:51 p.m. 15 16 250 Australian Avenue South 17 Suite 1500 18 West Palm Beach, Florida 33401 19 20 21 Reported By: 22 Cynthia Hopkins, RPR, FPR 23 Notary Public, State of Florida 24 Prose Court Reporting Services 25 Job No.: 1484</p>

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## APPEARANCES:

On behalf of the Plaintiffs, B.B.:

SPENCER T. KUVIN, ESQUIRE

LEOPOLD KUVIN

2925 PGA Boulevard

Suite 200

Palm Beach Gardens, Florida 33410

Phone: 561.515.1400

On behalf of the Plaintiffs, L.M., E.W. and  
Jane Doe:

MATTHEW WEISSING, ESQUIRE

FARMER, JAFFE, WEISSING, EDWARDS

FISTOS &amp; LEHRMAN, P.L.

425 North Andrews Avenue

Suite 2

Fort Lauderdale, Florida 33301

Phone: 954.524.2820

On behalf of Jane Does 1 through 8:

ADAM D. HOROWITZ, ESQUIRE

MERMELSTEIN &amp; HOROWITZ, P.A.

18205 Biscayne Boulevard

Suite 2218

Miami, Florida 33160

Phone: 305.931.2200

E-mail: Ahorowitz@sexabuseattorney.com

On behalf of the Plaintiffs, 101, 102 and 103:

KATHERINE W. EZELL, ESQUIRE

AMY JOSEFSBERG EDERI, ESQUIRE

PODHURST ORSECK

25 West Flagler Street

Suite 800

Miami, Florida 33130

Phone: 305.358.2800

(Via telephone)

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Appearances continued...

On behalf of the Plaintiff, Jane Doe II:

ISIDRO MANUEL GARCIA, ESQUIRE

GARCIA, ELKINS &amp; BOEHRINGER

224 Datura Avenue, Suite 900

West Palm Beach, Florida 33401

Phone: 561.832.8033

On behalf of the Defendant:

JACK ALAN GOLDBERGER, ESQUIRE

ATTERBURY, GOLDBERGER &amp; WEISS, P.A.

250 Australian Avenue South

Suite 1400

West Palm Beach, Florida 33401-5012

Phone: 561.659.8300

On behalf of the Witness:

BRUCE E. REINHART, ESQUIRE

LAW OFFICE OF BRUCE E. REINHART

One Clearlake Center

250 South Australian Avenue, Suite 1400

West Palm Beach, Florida 33401

Phone: 561.202.6360

## ALSO PRESENT:

Jessica Cadwell, Paralegal

Burman, Critton, Luttier &amp; Coleman, P.A.

Joseph Kozak, Videographer

Prose Court Reporting Services

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## PROCEEDINGS

THE VIDEOGRAPHER: We are now on video record. This is Media No. 1 in the videotaped deposition of Sarah Kellen in the matter of Jane Doe versus Jeffrey Epstein, et al. Today is Wednesday, March 24th, 2010. It is 10:36 a.m. We are here at Prose Court Reporting, 250 South Australian Avenue, West Palm Beach, Florida.

My name is Joe Kozak. I'm the videographer. The reporter is Cindy Hopkins from Prose Court Reporting Agency. Would counsel please introduce yourselves, and then the court reporter will swear in the witness.

MR. KUVIN: Good morning. Spencer Kuvin on behalf of one of the Plaintiffs.

MR. HOROWITZ: Adam Horowitz on behalf of Jane Does 2 through 8. And just for the record purposes, the deposition is also being taken in the federal cases, I believe, case being Jane Doe 2 versus Jeffrey Epstein.

MR. WEISSING: Matt Weissing on behalf of three of the Plaintiffs.

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MR. GARCIA: Sid Garcia for Jane Doe,  
Roman Numeral II.

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

MS. CADWELL: Jessica Cadwell, paralegal,  
on behalf of Jeffrey Epstein.

MR. RHEINHART: Bruce Reinhart on behalf  
of the witness, Sarah Kellen.

MR. KUVIN: Kathy, your turn.

MS. EZELL: Okay. Kathy Ezell and Amy  
Ederi on behalf of Plaintiff, Jane Doe 103.  
Thereupon,

(SARAH KELLEN)

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

DIRECT EXAMINATION

BY MR. KUVIN:

Q. Good morning.

A. Morning.

Q. Could you give us your full name, please.

A. Sarah Kellen.

Q. Do you have a middle name?

A. Lynnelle.

Q. Would you spell that for us?

A. L-y-n-n-e-l-l-e.

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Q. What's your current address?

MR. RHEINHART: I'm going to instruct the  
witness not to answer that question on the  
basis of her Fifth and 14th Amendment  
privileges against self-incrimination.

MR. KUVIN: Okay. We had spoken before  
with respect to there are likely going to be  
answers similar to that throughout this  
deposition. I have agreed to a procedure that  
we can do a shortened answer. However you want  
to handle that, I leave it up to you. But I do  
agree that whatever the shortened answer is,  
that it will satisfy the length, lengthy answer  
that she would like to give.

So, do we want to do that with this  
question, or how do you want to handle  
that procedurally?

MR. RHEINHART: Well, I think I have given  
the instruction. I think she, will give her  
the same instruction in the future to the  
extent that it's relevant, and I think that if  
we can all just agree that if she simply says  
or I simply say "The Fifth Amendment," that  
will qualify as giving a sufficient answer to  
-- as a matter of law, and will invoke that

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privilege.

MR. KUVIN: I'll agree with that  
procedure.

MR. RHEINHART: Anyone object to that  
procedure?

MR. GOLDBERGER: Actually I think if, in  
fact, this deposition is used in a trial, I  
think you would want the lengthier answer as  
being the answer that is played to the jury.  
So either you guys can agree that it gets cut  
in or she's going to have to -- I can't tell  
you what to do, but I would suggest that she  
give the lengthier answer each time.

But there's got to be a way that you  
guys can reach an agreement though, that  
from a technology perspective, that the  
lengthy answer that she just gave would be  
used during any trial testimony. Can that  
be done?

MR. KUVIN: I don't know procedurally  
whether it can be done.

MR. GOLDBERGER: I think --

MR. KUVIN: I don't know that, well --

MR. GOLDBERGER: And again, it's not my,  
it's not my deal. I'm just telling you how

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we've done it in the past.

MR. KUVIN: I hear you, and I have a  
number of issues primary, primarily of which  
that you're not here to represent anyone  
currently.

MR. GOLDBERGER: Yeah, I am. I'm  
actually, I'm actually here representing  
Jeffrey Epstein, so...

MR. KUVIN: Okay. With respect to all the  
civil cases, though, you're not here to  
represent anyone, so --

MR. GOLDBERGER: Yes, I am.

MR. KUVIN: With the exception --

MR. GOLDBERGER: I represent -- I am -- I  
don't mean to interrupt you, but I am counsel  
of record in the civil cases.

MR. KUVIN: Okay. Okay.

MR. RHEINHART: If we have a stipulation,  
what's the problem? Are you --

MR. KUVIN: There is none.

MR. RHEINHART: -- worried about a waiver?

MR. GOLDBERGER: No, I'm not worried about  
that at all. I'm worried about what is played  
to a jury if this gets tried.

MR. KUVIN: Okay. And I appreciate you

3 (Pages 9 to 12)

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1 MR. RHEINHART: Same instruction.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment  
 4 privilege.  
 5 BY MR. KUVIN:  
 6 Q. Have you ever worked as a professional  
 7 model?  
 8 MR. RHEINHART: May I consult?  
 9 MR. KUVIN: Sure.  
 10 MR. RHEINHART: You can answer the  
 11 question.  
 12 THE WITNESS: Yes.  
 13 BY MR. KUVIN:  
 14 Q. When?  
 15 A. I don't remember. I don't remember the dates.  
 16 It was at least maybe ten years ago.  
 17 Q. And you're how old now?  
 18 MR. RHEINHART: I'll instruct the witness  
 19 not to answer the question. Nice try.  
 20 Instruct you not to answer based on  
 21 your Fifth Amendment privilege.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I'm going to invoke my Fifth Amendment  
 24 privilege.  
 25 MR. KUVIN: I'm just trying to find out.

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1 MR. RHEINHART: Like I said, good try.  
 2 Move on.  
 3 BY MR. KUVIN:  
 4 Q. With respect to your work as a  
 5 professional model, what company did you work for?  
 6 MR. RHEINHART: Instruct the witness not  
 7 to answer based on the Fifth Amendment  
 8 privilege.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer, I invoke my Fifth Amendment privilege.  
 11 BY MR. KUVIN:  
 12 Q. What is your understanding of  
 13 Mr. Epstein's involvement with the modeling  
 14 industry?  
 15 MR. RHEINHART: Standing objection, and  
 16 instruct the witness not to answer based on  
 17 Fifth Amendment, on that basis.  
 18 THE WITNESS: Upon the instruction of my  
 19 lawyer, I must invoke my Fifth Amendment  
 20 privilege.  
 21 BY MR. KUVIN:  
 22 Q. Were you ever promised anything regarding  
 23 your modeling career by Jean-Luc Brunel?  
 24 MR. RHEINHART: Instruct the witness not  
 25 to answer based on Fifth Amendment, also

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1 assumes facts that have not been established  
 2 and it's compound.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment  
 5 privilege.  
 6 MR. RHEINHART: And to clarify the  
 7 objection is that it assumes that she's ever  
 8 met or knows anything about Jean-Luc Brunel.  
 9 BY MR. KUVIN:  
 10 Q. Were you ever promised anything regarding  
 11 your modeling career by Jeffrey Epstein?  
 12 MR. RHEINHART: Same objection, instruct  
 13 the witness not to answer.  
 14 THE WITNESS: On the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment  
 16 privilege.  
 17 BY MR. KUVIN:  
 18 Q. You would agree with me that there is a  
 19 financial arrangement between Jean-Luc Brunel and  
 20 Jeffrey Epstein, do you not?  
 21 MR. RHEINHART: Objection. It assumes she  
 22 has any knowledge of either Mr. Epstein or  
 23 Mr. Brunel, and as to that she is going to  
 24 invoke her Fifth Amendment privilege. The  
 25 question is compound and therefore ambiguous.

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1 THE WITNESS: On the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment  
 3 privilege.  
 4 BY MR. KUVIN:  
 5 Q. Would you agree with me that  
 6 Ghislaine Maxwell provides underage girls to  
 7 Mr. Epstein for sex?  
 8 MR. RHEINHART: Objection to the form. It  
 9 assumes she knows anything at all about  
 10 Ghislaine Maxwell and asks her to assume that  
 11 she does, and therefore it is compound and  
 12 ambiguous, and I would instruct her not to  
 13 answer.  
 14 THE WITNESS: Upon the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment  
 16 privilege.  
 17 MR. KUVIN: That's a good point. Take a  
 18 look at what we'll mark as Exhibit 10.  
 19 (Plaintiff's Exhibit No. 10 was marked for  
 20 identification.)  
 21 MR. KUVIN: All me to show it to the  
 22 camera first.  
 23 MR. RHEINHART: Okay.  
 24 MR. KUVIN: Okay.  
 25 THE WITNESS: Okay.

25 (Pages 97 to 100)



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1 BY MR. KUVIN:

2 Q. Take a look at what we marked as Exhibit  
3 10. Do you recognize the two people in that  
4 photograph?

5 MR. RHEINHART: I'll instruct the witness  
6 not to answer based on her Fifth Amendment  
7 privilege.

8 THE WITNESS: On the instruction of my  
9 lawyer, I must invoke my Fifth Amendment  
10 privilege.

11 BY MR. KUVIN:

12 Q. Would you agree with me that's  
13 Ghislaine Maxwell on the right and Jeffrey Epstein  
14 on the left?

15 MR. RHEINHART: Objection to the form. It  
16 assumes that she knows who Ghislaine Maxwell  
17 and Jeffrey Epstein are, and therefore it's  
18 compound and ambiguous, and I would instruct  
19 her not to answer.

20 THE WITNESS: On the instruction of my  
21 lawyer, I must invoke my Fifth Amendment  
22 privilege.

23 MR. KUVIN: Okay. I will mark this as  
24 Exhibit 11.  
25

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1 (Plaintiff's Exhibit No. 11 was marked for  
2 identification.)

3 BY MR. KUVIN:

4 Q. Let me show you what we marked as  
5 Exhibit 11. Hang on one second.

6 MR. RHEINHART: Sure.

7 BY MR. KUVIN:

8 Q. Do you recognize the young lady shown in  
9 Exhibit 11?

10 MR. RHEINHART: I'll instruct the witness  
11 not to answer based on her Fifth Amendment  
12 privilege.

13 THE WITNESS: On the instruction of my  
14 lawyer, I must invoke my Fifth Amendment  
15 privilege.

16 BY MR. KUVIN:

17 Q. Do you agree with me that the young girl  
18 shown in Exhibit 11 was recruited by Ghislaine  
19 Maxwell to, for sexual activity with  
20 Jeffrey Epstein?

21 MR. RHEINHART: Objection to the form. It  
22 assumes she knows who the person is in Exhibit  
23 11, and assumes she knows who Ghislaine Maxwell  
24 is, and assumes she knows who Jeffrey Epstein  
25 is, and is therefore compound.

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1 You're asking the witness three  
2 questions at the same time, and I would  
3 instruct her not to answer based on the  
4 Fifth Amendment.

5 THE WITNESS: On the instruction of my  
6 lawyer, I must invoke my Fifth Amendment  
7 privilege.

8 MR. KUVIN: Just so we're clear, had she  
9 answered the first two questions, then  
10 obviously I wouldn't have to ask the third one  
11 that has all of them in it but --

12 MR. RHEINHART: If you had accepted her  
13 answer, you would have known that she wasn't  
14 going to answer these, and we could have saved  
15 a few minutes.

16 MR. KUVIN: And as you well know, I must  
17 ask the question in order to gain the inference  
18 at trial.

19 MR. RHEINHART: I understand.

20 MR. KUVIN: All right.

21 (Plaintiff's Exhibit No. 12 was marked for  
22 identification.)

23 BY MR. KUVIN:

24 Q. Do you recognize the gentleman that is  
25 shown --

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1 MR. RHEINHART: We'll have a job here.

2 MR. KUVIN: That is true.

3 BY MR. KUVIN:

4 Q. -- that is shown in Exhibit 12?

5 MR. KUVIN: Let me hold this for the  
6 camera first.

7 MR. RHEINHART: I'm sorry. Is there a  
8 question pending?

9 MR. KUVIN: Yes.

10 BY MR. KUVIN:

11 Q. Do you recognize the gentleman shown in  
12 Exhibit 12?

13 MR. RHEINHART: I instruct her not to  
14 answer based on the Fifth Amendment.

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

18 BY MR. KUVIN:

19 Q. Would you agree with me that that is  
20 Prince Andrew shown in Exhibit 12?

21 MR. RHEINHART: Same instruction.

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

26 (Pages 101 to 104)