

EXHIBIT 11

PART 1

Page 1	Page 3
<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>
Page 2	Page 4
<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>

Page 5

APPEARANCES:

On behalf of the Plaintiffs, B.B.:

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(Via telephone)

Page 6

Appearances continued...

On behalf of the Plaintiff, Jane Doe II:

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On behalf of the Defendant:

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On behalf of the Witness:

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ALSO PRESENT:

Jessica Cadwell, Paralegal

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

Joseph Kozak, Videographer

Prose Court Reporting Services

Page 7

INDEX

EXAMINATION DIRECT CROSS REDIRECT

SARAH KELLEN

BY MR. KUVIN 9

EXHIBITS

EXHIBIT DESCRIPTION PAGE

PLAINTIFF'S EX. 1 PHOTO 16

PLAINTIFF'S EX. 2 JEJE, INC., 24

PASSENGER MANIFEST

PLAINTIFF'S EX. 3 HYPERION AIR, INC.,

PASSENGER MANIFEST

PLAINTIFF'S EX. 6 PHOTO 63

PLAINTIFF'S EX. 7 PHOTO 65

PLAINTIFF'S EX. 8 PHOTO 68

PLAINTIFF'S EX. 9 PHOTO 71

PLAINTIFF'S EX. 10 PHOTO 100

PLAINTIFF'S EX. 11 PHOTO 101

PLAINTIFF'S EX. 12 PHOTO 103

PLAINTIFF'S EX. 4 PHONE MESSAGE PADS

PLAINTIFF'S EX. 5 CELLPHONE RECORDS

PLAINTIFF'S EX. 13 PHOTO 144

Page 8

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.

2 (Pages 5 to 8)

Page 9

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

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

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

7 MR. RHEINHART: Bruce Rheinart on behalf
8 of the witness, Sarah Kellen.

9 MR. KUVIN: Kathy, your turn.

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

13 (SARAH KELLEN)

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

16 DIRECT EXAMINATION

17 BY MR. KUVIN:

18 Q. Good morning.

19 A. Morning.

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

21 A. Sarah Kellen.

22 Q. Do you have a middle name?

23 A. Lynnelle.

24 Q. Would you spell that for us?

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

Page 10

1 Q. What's your current address?

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

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

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

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

Page 11

1 privilege.

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

4 MR. RHEINHART: Anyone object to that
5 procedure?

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

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

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

22 MR. GOLDBERGER: I think --

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

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

Page 12

1 we've done it in the past.

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

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

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

12 MR. GOLDBERGER: Yes, I am.

13 MR. KUVIN: With the exception --

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

17 MR. KUVIN: Okay. Okay.

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

20 MR. KUVIN: There is none.

21 MR. RHEINHART: -- worried about a waiver?

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

25 MR. KUVIN: Okay. And I appreciate you

3 (Pages 9 to 12)

Page 13

1 coaching Bruce, but I think he can handle
 2 himself pretty adequately now --
 3 MR. GOLDBERGER: I have --
 4 MR. KUVIN: So I leave it up to Bruce --
 5 MR. GOLDBERGER: I have all the confidence
 6 in Bruce.
 7 MR. KUVIN: Mr. Rheinhardt, with respect to
 8 how you want to handle it, I think we have an
 9 agreement.
 10 MR. RHEINHART: I'm satisfied that we have
 11 a stipulation, and I assume if there is ever a
 12 trial, that would be played or produced to the
 13 jury that simply by using shorthand, what she's
 14 really saying is the lengthier answer now. I'm
 15 satisfied with that.
 16 MR. KUVIN: And I agree with that.
 17 BY MR. KUVIN:
 18 Q. Okay. Ma'am, what is your current
 19 address?
 20 MR. RHEINHART: Again, I will instruct the
 21 witness not to answer the question.
 22 THE WITNESS: On the instruction of my
 23 lawyer, I choose to invoke my Fifth Amendment
 24 right.
 25

Page 14

1 BY MR. KUVIN:
 2 Q. What is your current phone number?
 3 MR. RHEINHART: Same instruction.
 4 THE WITNESS: On the advice of my lawyer,
 5 I choose to invoke my Fifth Amendment right.
 6 BY MR. KUVIN:
 7 Q. What is your cellphone number?
 8 MR. RHEINHART: Same instruction --
 9 THE WITNESS: On the advice of my lawyer,
 10 I choose to invoke my Fifth Amendment right.
 11 MR. RHEINHART: You have to let me speak
 12 before you answer in case there's an objection
 13 or any of the other lawyers have an objection.
 14 BY MR. KUVIN:
 15 Q. I am going to show you a photograph. Oh,
 16 what is your date of birth?
 17 MR. RHEINHART: Same instruction.
 18 THE WITNESS: On the advice of my lawyer,
 19 I choose to invoke my Fifth Amendment right.
 20 MR. KUVIN: Let's make is easier.
 21 BY MR. KUVIN:
 22 Q. Ms. Kellen, would you agree with me that
 23 your date of birth is May 25th, 1979?
 24 MR. RHEINHART: Same instruction.
 25 THE WITNESS: On the advice of my lawyer,

Page 15

1 I choose to invoke my Fifth Amendment right.
 2 BY MR. KUVIN:
 3 Q. Would you agree with me that you're
 4 approximately 5 feet, 8 inches tall?
 5 MR. RHEINHART: Same instruction.
 6 THE WITNESS: On the advice of my lawyer,
 7 I must invoke my Fifth Amendment right.
 8 BY MR. KUVIN:
 9 Q. Would you agree with me that your eyes are
 10 hazel?
 11 MR. RHEINHART: Same instruction.
 12 THE WITNESS: On the advice of my lawyer,
 13 I choose to invoke my Fifth Amendment right.
 14 BY MR. KUVIN:
 15 Q. Would you agree with me that you were born
 16 in Hawaii?
 17 MR. RHEINHART: Same instruction.
 18 THE WITNESS: On the advice of my lawyer,
 19 I choose to invoke my Fifth Amendment right.
 20 BY MR. KUVIN:
 21 Q. What are the names of your parents?
 22 MR. RHEINHART: Same instruction.
 23 THE WITNESS: On the advice of my lawyer,
 24 I must invoke my Fifth Amendment right.
 25

Page 16

1 BY MR. KUVIN:
 2 Q. Are you married or single?
 3 MR. RHEINHART: Same instruction.
 4 THE WITNESS: On the advice of my lawyer,
 5 I must to invoke my Fifth Amendment right.
 6 (Plaintiff's Exhibit No. 1 was marked for
 7 identification.)
 8 MR. KUVIN: I'm going to show you what
 9 we'll mark as Plaintiff's Exhibit 1.
 10 And I'll ask the videographer to zoom
 11 in here for a second.
 12 BY MR. KUVIN:
 13 Q. Okay. Ma'am, I am going to show you a
 14 photograph we've marked as Plaintiff's Exhibit 1 and
 15 ask you if you recognize this registered sex
 16 offender.
 17 MR. RHEINHART: First, object to the form
 18 of the question. It assumes facts not before
 19 the witness, and I'll give the witness the same
 20 instruction as to that question.
 21 THE WITNESS: At the advice of my lawyer,
 22 I must invoke my Fifth Amendment right.
 23 BY MR. KUVIN:
 24 Q. Would you agree with me that this
 25 registered sex offender's name is Jeffrey Epstein?

4 (Pages 13 to 16)

Page 17

1 MR. RHEINHART: Same instruction, same
2 objection.

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

5 BY MR. KUVIN:

6 Q. Would you agree with me that Jeffrey
7 Epstein is a sexual offender?

8 MR. RHEINHART: Object to the form of the
9 question and instruct the witness not to answer
10 on her Fifth Amendment privilege.

11 THE WITNESS: On the advice of my lawyer I
12 must invoke my Fifth Amendment right.

13 BY MR. KUVIN:

14 Q. Would you agree with me that
15 Jeffrey Epstein sexually abused you?

16 MR. RHEINHART: Objection to the form,
17 both as to the form of the question as to
18 harassing and instruct the witness not to
19 answer, based on the Fifth Amendment privilege.

20 THE WITNESS: On the advice of my lawyer,
21 I must invoke my Fifth Amendment right.

22 BY MR. KUVIN:

23 Q. Would you agree with me that you were a
24 minor when Jeffrey Epstein first had sexual
25 relations with you?

Page 19

1 question. It's ambiguous and compound, and I
2 will instruct the witness not to answer based
3 on her Fifth Amendment privilege.

4 THE WITNESS: On the advice of my lawyer,
5 I must invoke my Fifth Amendment right.

6 BY MR. KUVIN:

7 Q. And why did you do that?

8 MR. RHEINHART: Object to the form. It's
9 ambiguous, in fact that what?

10 BY MR. KUVIN:

11 Q. Why did you bring minor girls to
12 Jeffrey Epstein for him to have sex with?

13 MR. RHEINHART: Same objection as to form
14 and instruct the witness not to answer.

15 THE WITNESS: On the advice of my lawyer,
16 I must invoke my Fifth Amendment right.

17 BY MR. KUVIN:

18 Q. What do you currently do for a job?

19 MR. RHEINHART: Instruct the witness not
20 to answer the question.

21 THE WITNESS: On the advice of my lawyer,
22 I must invoke my Fifth Amendment right.

23 BY MR. KUVIN:

24 Q. Would you agree with me that you currently
25 work for Jeffrey Epstein?

Page 18

1 MR. RHEINHART: Object to the form. It
2 assumes facts not before the witness. It is a
3 compound question and I would instruct the
4 witness not to answer based on her Fifth
5 Amendment privilege.

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

8 BY MR. KUVIN:

9 Q. Would you agree with me that you have had
10 sex with Jeffrey Epstein?

11 MR. RHEINHART: Same instruction.

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

14 BY MR. KUVIN:

15 Q. Would you agree with me that you first had
16 sex with Jeffrey Epstein when you were under the age
17 of 18?

18 MR. RHEINHART: Same instruction.

19 THE WITNESS: On the advice of my lawyer,
20 I must invoke my Fifth Amendment right.

21 BY MR. KUVIN:

22 Q. Would you agree with me, ma'am, that you
23 brought numerous underage girls to Jeffrey Epstein
24 so that he could have sex with them?

25 MR. RHEINHART: Object to the form of the

Page 20

1 MR. RHEINHART: Instruct the witness not
2 to answer the question.

3 THE WITNESS: On the advice of my lawyer,
4 I must invoke my Fifth Amendment right.

5 BY MR. KUVIN:

6 Q. How long have you worked for
7 Jeffrey Epstein?

8 MR. RHEINHART: Same instruction.

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

11 BY MR. KUVIN:

12 Q. Would you agree with me that you've worked
13 for Jeff, Jeffrey Epstein for over 20 years as his
14 personal assistant?

15 MR. RHEINHART: Instruct the witness not
16 to answer the question.

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

19 BY MR. KUVIN:

20 Q. Would you agree with me that when you
21 first were hired by Jeffrey Epstein as his personal
22 assistant, you were under the age of 18?

23 MR. RHEINHART: Object to the form. It's
24 compound and assumes facts not present before
25 the witness, and I instruct the witness not to

5 (Pages 17 to 20)

Page 21

1 answer the question based on her Fifth
 2 Amendment privilege.
 3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment right.
 5 BY MR. KUVIN:
 6 Q. Who introduced you to Jeffrey Epstein the
 7 first time that you met him?
 8 MR. RHEINHART: Same instruction.
 9 THE WITNESS: On the instruction of my
 10 lawyer, I must invoke my Fifth Amendment right.
 11 BY MR. KUVIN:
 12 Q. Did Ghislaine Maxwell introduce you to
 13 Jeffrey Epstein for the first time?
 14 MR. RHEINHART: Same instruction.
 15 THE WITNESS: On the instruction of my
 16 lawyer, I must invoke my Fifth Amendment right.
 17 BY MR. KUVIN:
 18 Q. When was the first time you were in
 19 Jeffrey Epstein's home located on El Brillo Way on
 20 Palm Beach Island?
 21 MR. RHEINHART: Object to the form of the
 22 question as compound and assuming facts not
 23 before the witness. And I instruct the witness
 24 not to answer based on her Fifth Amendment
 25 privilege.

Page 22

1 THE WITNESS: On the instruction of my
 2 lawyer, I must invoke my Fifth Amendment right.
 3 BY MR. KUVIN:
 4 Q. Would you agree with me that
 5 Jeffrey Epstein owns a home at 358 El Brillo Way,
 6 Palm Beach Island, Florida?
 7 MR. RHEINHART: Instruct the witness not
 8 to answer based on her Fifth Amendment
 9 privilege.
 10 THE WITNESS: On instruction of my
 11 counsel, I must invoke my Fifth Amendment
 12 right.
 13 BY MR. KUVIN:
 14 Q. Would you agree with me that you've been
 15 in that home numerous times?
 16 MR. RHEINHART: Instruct the witness not
 17 to answer the question based on her Fifth
 18 Amendment privilege.
 19 THE WITNESS: On instruction of my lawyer,
 20 I must invoke my Fifth Amendment right.
 21 BY MR. KUVIN:
 22 Q. Would you agree with me that you have gone
 23 on Jeffrey Epstein's plane numerous times?
 24 MR. RHEINHART: Object to the form. It
 25 assumes facts that are not present for the

Page 23

1 witness, and I will instruct the witness not to
 2 answer based on her Fifth Amendment privilege.
 3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment right.
 5 BY MR. KUVIN:
 6 Q. Would you agree with me that
 7 Jeffrey Epstein owns numerous planes, private
 8 planes?
 9 MR. RHEINHART: Instruct the witness not
 10 to answer.
 11 THE WITNESS: On the instruction of my
 12 lawyer, I must invoke my Fifth Amendment right.
 13 BY MR. KUVIN:
 14 Q. And you've been on every one of those
 15 private planes; isn't that true?
 16 MR. RHEINHART: Object to the form. It
 17 assumes facts not before the witness, and I
 18 will instruct the witness not to answer based
 19 on her Fifth Amendment privilege.
 20 THE WITNESS: On the instruction of my
 21 lawyer, I must invoke my Fifth Amendment right.
 22 BY MR. KUVIN:
 23 Q. Ma'am, isn't it true that you've seen the
 24 passenger manifest for Jeffrey Epstein's plane?
 25 MR. RHEINHART: Object to the form. It

Page 24

1 assumes facts that are not established as known
 2 to this witness, and I instruct the witness not
 3 to answer the question based on her Fifth
 4 Amendment privilege.
 5 THE WITNESS: On the instruction of my
 6 lawyer, I must invoke my Fifth Amendment right.
 7 MR. KUVIN: Let me show you what we'll
 8 mark as Exhibit 2.
 9
 10 (Plaintiff's Exhibit No. 2 was marked for
 11 identification.)
 12 MR. KUVIN: Thank you.
 13 MR. RHEINHART: Do you want to zoom in on
 14 it like you did the last time?
 15 MR. KUVIN: No, that's fine.
 16 MR. RHEINHART: Take your time.
 17 MR. KUVIN: And flip through.
 18 BY MR. KUVIN:
 19 Q. All right. Ma'am, would you agree with me
 20 that this is a passenger manifest for one of
 21 Jeffrey Epstein's airplanes?
 22 MR. RHEINHART: Instruct the witness not
 23 to answer the question based on her Fifth
 24 Amendment privilege.
 25 THE WITNESS: On the instruction of my

6 (Pages 21 to 24)

Page 25

1 lawyer I must exercise my Fifth Amendment
2 right.

3 BY MR. KUVIN:

4 Q. And would you agree with me that you
5 appear as a passenger on these flight manifests on
6 numerous occasions?

7 MR. RHEINHART: Object to the form. It
8 assumes facts not established as known to this
9 witness, and I instruct the witness not to
10 answer the question.

11 THE WITNESS: On the instruction of my
12 lawyer, I must exercise my Fifth Amendment
13 right.

14 BY MR. KUVIN:

15 Q. Would you agree with me that your name
16 does, in fact, appear on the passenger manifest for
17 these planes, for this plane?

18 MR. RHEINHART: Same objection and same
19 instruction.

20 THE WITNESS: On the advice of my lawyer,
21 I must invoke my Fifth Amendment right.

22 BY MR. KUVIN:

23 Q. Who are the two females that appear on the
24 passenger manifest for January 11, 2005, on the
25 first page of Exhibit 2?

Page 26

1 MR. RHEINHART: I'll object to the form,
2 and it has not been established this witness
3 knows anything about this document, and I will
4 instruct her not to answer based on the Fifth
5 Amendment privilege.

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

8 BY MR. KUVIN:

9 Q. Do you agree with me that you took a
10 flight on Jeffrey Epstein's plane from West Palm
11 Beach to the U.S. Virgin Islands, St. Thomas on
12 January 11, 2005?

13 MR. RHEINHART: Instruct the witness not
14 to answer the question based on her Fifth
15 Amendment privilege.

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

18 BY MR. KUVIN:

19 Q. Would you agree with me that on that
20 flight were you, Jeffrey Epstein, Nadia Marcinkova
21 and two unknown females?

22 MR. RHEINHART: Object to the form. Again
23 assumes facts that have not been established
24 this witness has any knowledge of and instruct
25 the witness not to answer based on her Fifth

Page 27

1 Amendment privilege.

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

4 BY MR. KUVIN:

5 Q. Would you also agree with me that the two
6 unknown females listed on the passenger manifest
7 marked as Exhibit 2 were underage girls, under the
8 age of 18?

9 MR. RHEINHART: Object to the form. It
10 calls for speculation. Also it's not been
11 established this witness has any knowledge of
12 this document and instruct her not to answer
13 based on her Fifth Amendment privilege.

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

16 BY MR. KUVIN:

17 Q. Would you agree with me that the girls
18 that are listed as females one, and the second
19 female for this flight of January 11, 2005, from
20 West Palm Beach to the U.S. Virgin Islands, that
21 those two females were under the age of 17?

22 MR. RHEINHART: Same objection. It has
23 not been established the witness has any
24 knowledge of this document. It calls for her
25 to speculate, and I instruct her not to answer

Page 28

1 based on her Fifth Amendment privilege.

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

4 BY MR. KUVIN:

5 Q. Would you agree with me that the two
6 females shown on the flight with you of January 11,
7 2005 were under the age of 16?

8 MR. RHEINHART: Same objection as to form.
9 It has not been established this witness knows
10 anything about whether there were these
11 witnesses, these females and who they are, so
12 it's asking her to speculate, and I instruct
13 her not to answer based on her Fifth Amendment
14 privilege.

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

18 BY MR. KUVIN:

19 Q. Ma'am, you were on that flight of
20 January 11, 2005, were you not?

21 MR. RHEINHART: I instruct the witness not
22 to answer based on her Fifth Amendment
23 privilege.

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

7 (Pages 25 to 28)

Page 29

1 BY MR. KUVIN:

2 Q. You also agree with me that the two girls
3 that are listed as on that flight with you of
4 January 11, 2005, were under the age of 15 years
5 old?

6 MR. RHEINHART: Object to the form. It
7 calls for speculation, lack of personal
8 knowledge, and instruct the witness not to
9 answer based on her Fifth Amendment privilege.

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

12 BY MR. KUVIN:

13 Q. Would you agree with me that the two
14 females listed as being on that flight with you of
15 January 11 of 2005 were under the age of 14 years
16 old?

17 MR. RHEINHART: Object to the form. It
18 calls for speculation. The witness has no
19 personal knowledge and instruct the witness not
20 to answer based on her Fifth Amendment
21 privilege.

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

24 BY MR. KUVIN:

25 Q. Would you agree with me that the two

Page 31

1 MR. RHEINHART: Same instruction.

2 THE WITNESS: On the instruction of my
3 lawyer, I must invoke my Fifth Amendment right.
4 BY MR. KUVIN:

5 Q. Who is Dana Burns?

6 MR. RHEINHART: Same instruction.

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

9 BY MR. KUVIN:

10 Q. Who is Mark Zeff.

11 MR. RHEINHART: Same instruction.

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

14 BY MR. KUVIN:

15 Q. Who is David Mullen?

16 MR. RHEINHART: Same instruction.

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

19 BY MR. KUVIN:

20 Q. Who is Todd Meister?

21 MR. RHEINHART: Same instruction.

22 THE WITNESS: On the advice of my lawyer,
23 I must invoke my Fifth Amendment right.

24 BY MR. KUVIN:

25 Q. Who is Jean-Luc Brunel?

Page 30

1 females listed as being on the flight with you of
2 January 11, 2005, from West Palm Beach to the U.S.
3 Virgin Islands, with Jeffrey Epstein as well, were
4 under the age of 13 years old and you were aware of
5 that?

6 MR. RHEINHART: Object to the form both as
7 compound, it also assumes facts that it has not
8 been established this witness has any knowledge
9 of, calls for her to speculate, and I instruct
10 her not to answer based on her Fifth Amendment
11 privilege.

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

14 BY MR. KUVIN:

15 Q. Who is Adriana Musinska?

16 MR. RHEINHART: I'm sorry. Can you repeat
17 the name?

18 MR. KUVIN: Musinska, M-u-s-i-n-s-k-a.

19 MR. RHEINHART: I'll instruct the witness
20 not to answer based on her Fifth Amendment
21 privilege.

22 THE WITNESS: On instruction of my lawyer,
23 I must invoke my Fifth Amendment right.

24 BY MR. KUVIN:

25 Q. Who's Ghislaine Maxwell?

Page 32

1 MR. RHEINHART: Same instruction.

2 THE WITNESS: On the advice of my lawyer,
3 I must invoke my Fifth Amendment right.

4 BY MR. KUVIN:

5 Q. Ma'am, would you agree with me that all of
6 the names I just recently mentioned where you
7 invoked your Fifth Amendment, were involved in a
8 conspiracy to abuse underaged girls, girls under the
9 age of 18 for sexual gain and pleasure?

10 MR. RHEINHART: Object to the form of the
11 question. It calls for a legal conclusion. It
12 is compound. It calls for her to speculate.
13 There is no basis for her to be able to give a
14 legal opinion as to what a conspiracy is, and I
15 instruct her not to answer based on her Fifth
16 Amendment privilege.

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

19 BY MR. KUVIN:

20 Q. Would you agree with me that all of the
21 names I just mentioned were individuals that were
22 working together for their own sexual gain and
23 pleasure?

24 MR. RHEINHART: Object to the form of the
25 question as ambiguous and compound. I instruct

8 (Pages 29 to 32)

Page 33

Page 35

1 her not to answer based on her Fifth Amendment
2 privilege.

3 THE WITNESS: On the advice of my lawyer I
4 must invoke my Fifth Amendment privilege.

5 BY MR. KUVIN:

6 Q. What is MC Squared?

7 MR. RHEINHART: I instruct the witness not
8 to answer based on her Fifth Amendment
9 privilege.

10 THE WITNESS: On the advice of my lawyer I
11 must invoke my Fifth Amendment right.

12 BY MR. KUVIN:

13 Q. Would you agree with me that MC Squared is
14 a modeling agency that was funded by
15 Jeffrey Epstein?

16 MR. RHEINHART: I instruct the witness not
17 to answer based on her Fifth Amendment
18 privilege.

19 THE WITNESS: The advice of my lawyer I
20 must invoke my Fifth Amendment right.

21 BY MR. KUVIN:

22 Q. Would you agree with me that MC Squared
23 was wholly funded by Jeffrey Epstein?

24 MR. RHEINHART: Object to the form of the
25 question as to what "wholly funded" means, and

1 BY MR. KUVIN:

2 Q. Would you agree with me that Jeffrey
3 Epstein worked closely with Jean-Luc Brunel in order
4 to obtain girls from out of state and bring them to
5 Florida for their own sexual pleasure?

6 MR. RHEINHART: Object to the form as
7 ambiguous, whose own sexual pleasure, and
8 instruct the witness not to answer the question
9 based on her Fifth Amendment privilege.

10 MR. KUVIN: Perfectly good objection. She
11 doesn't have to answer the question. Let me
12 clarify.

13 BY MR. KUVIN:

14 Q. Would you agree with me, ma'am, that both
15 Jean-Luc Brunel and Jeffrey Epstein worked together
16 to obtain underage girls from out of state and bring
17 them to Florida for both of their own sexual
18 pleasure?

19 MR. RHEINHART: I'm going to object as
20 compound and instruct -- I object to the form
21 as compound, and instruct the witness not to
22 answer based on her Fifth Amendment privilege.

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

Page 34

Page 36

1 I would instruct the witness not to answer the
2 question based on her Fifth Amendment
3 privilege.

4 THE WITNESS: On the advice of my lawyer I
5 must invoke my Fifth Amendment right.

6 BY MR. KUVIN:

7 Q. Would you agree with me that
8 Jeffrey Epstein is the sole individual whose money
9 was used to start the company, MC Squared?

10 MR. RHEINHART: Instruct the witness not
11 to answer the question based on her Fifth
12 Amendment privilege.

13 THE WITNESS: On the advice of my lawyer I
14 must invoke my Fifth Amendment right.

15 BY MR. KUVIN:

16 Q. Would you agree with me that
17 Jean-Luc Brunel worked with Jeffrey Epstein to
18 obtain underage girls for both of their sexual
19 pleasure?

20 MR. RHEINHART: Object to the form of the
21 question as ambiguous and instruct the witness
22 not to answer based on her Fifth Amendment
23 privilege.

24 THE WITNESS: On the advice of my lawyer I
25 must invoke my Fifth Amendment right.

1 BY MR. KUVIN:

2 A. Would you agree with me that
3 Ghislaine Maxwell, Jean-Luc Brunel, and Jeffrey Epstein
4 worked together to obtain underage girls from out of
5 state and bring them into the State of Florida for their
6 own sexual pleasure?

7 MR. RHEINHART: Object to the form of the
8 question as compound and ambiguous, and
9 instruct the witness not to answer based on her
10 Fifth Amendment privilege.

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

13 (Katherine Ezell and Amy Ederi
14 entered the deposition.)

15 MR. GOLDBERGER: That's why we're --

16 MR. KUVIN: That's why we lost them.

17 MR. RHEINHART: Do you want to take a
18 one-minute break so we can --

19 MR. KUVIN: Yeah, let's take a quick
20 one-minute break.

21 THE VIDEOGRAPHER: We're now off video
22 record. The time is 10:56 a.m.

23 (A brief recess was held.)

24 (Plaintiff's Exhibit No. 3 was marked for
25 identification.)

9 (Pages 33 to 36)

Page 37

1 THE VIDEOGRAPHER: We're now on video
2 record at 11:01 a.m.

3 MR. KUVIN: Just for the video record and
4 for the written record Katherine Ezell and Amy
5 Ederi have now appeared and are present in
6 person.

7 MR. GOLDBERGER: Just one more matter for
8 the record. Jack Goldberger, on behalf of
9 Jeffrey Epstein. Rather than impose a form
10 objection to every question, I think we have
11 reached an agreement that on behalf of
12 Mr. Epstein, I am adopting the form objections
13 that Mr. Rheinhart is making on behalf of his
14 client nunc pro tunc to the beginning of this
15 deposition.

16 MR. KUVIN: No objection.

17 MR. GOLDBERGER: Okay.

18 BY MR. KUVIN:

19 Q. All right. All right. Ms. Kellen, would
20 you agree with me that there was an agreement
21 between Jeffrey Epstein, Ghislaine Maxwell,
22 Jean-Luc Brunel, yourself and Nadia Marcinkova to
23 bring in girls from out of state that were underage?

24 MR. RHEINHART: Object to the form of the
25 question as leading, as compound, and instruct

Page 39

1 personal knowledge and instruct her not to
2 answer based on her Fifth Amendment privilege.
3 It's also compound.

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

7 BY MR. KUVIN:

8 Q. The witness says that you may not have
9 knowledge or we don't know whether you have
10 knowledge regarding this passenger manifest, so let
11 me ask you, do you have any knowledge about this
12 passenger manifest?

13 MR. RHEINHART: Object to the form of the
14 question as ambiguous as to this and what a
15 manifest is, and also her knowledge, and I will
16 instruct her not to answer based on her Fifth
17 Amendment privilege.

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

21 BY MR. KUVIN:

22 Q. Based on the objection, do you know what a
23 manifest is?

24 MR. RHEINHART: Object to the form of the
25 question as ambiguous and instruct her not to

Page 38

1 the witness not to answer based on her Fifth
2 Amendment privilege.

3 THE WITNESS: On the instruction of my
4 lawyer I must invoke my Fifth Amendment right.
5 BY MR. KUVIN:

6 Q. Would you agree with me that there was an
7 agreement between Jeffrey Epstein,
8 Ghislaine Maxwell, Jean-Luc Brunel, yourself and
9 Nadia Marcinkova to bring in girls that were
10 underage from out of state for sexual contact?

11 MR. RHEINHART: Object to the form of the
12 question as leading and compound, and I
13 instruct the witness not to answer based on her
14 Fifth Amendment privilege.

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

18 BY MR. KUVIN:

19 Q. All right. Let me show you what we've
20 premarked as Plaintiff's Exhibit 3. Do you
21 recognize this as the passenger manifest for one of
22 Jeffrey Epstein's planes?

23 MR. RHEINHART: I object to the form of
24 the question. It assumes facts that this
25 witness, evidence that this witness has no

Page 40

1 answer based on her Fifth Amendment privilege.

2 THE WITNESS: On the instruction of my
3 lawyer I must invoke my Fifth Amendment right.
4 BY MR. KUVIN:

5 Q. Have you heard the word "manifest" before?

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

9 THE WITNESS: On the instruction of my
10 lawyer I must invoke my Fifth Amendment right.
11 BY MR. KUVIN:

12 Q. Would you agree with me, ma'am, that you
13 have seen this passenger manifest, listed as
14 Exhibit 3, in the past?

15 MR. RHEINHART: I'll instruct the witness
16 not to answer based on her Fifth Amendment
17 privilege.

18 THE WITNESS: On the instruction of my
19 lawyer I must invoke my Fifth Amendment right.
20 BY MR. KUVIN:

21 Q. Who is Zinta Broukis?

22 MR. RHEINHART: I'll instruct the witness
23 not to answer based on her Fifth Amendment
24 privilege.

25 THE WITNESS: On the instruction of my

10 (Pages 37 to 40)

Page 41

1 lawyer I must invoke my Fifth Amendment
2 privilege.
3 MR. KUVIN: Spelling for the court
4 reporter is Z-i-n-t-a, B-r-o-u-k-i-s.
5 BY MR. KUVIN:
6 Q. Who is Eva Andersson, with two S's?
7 MR. RHEINHART: I'll instruct the witness
8 not to answer based on her Fifth Amendment
9 privilege.
10 THE WITNESS: On the instruction of my
11 lawyer, I must invoke my Fifth Amendment right.
12 BY MR. KUVIN:
13 Q. Who is Sevina Dubin (phonetic)?
14 MR. RHEINHART: Same instruction.
15 THE WITNESS: On the instruction of my
16 lawyer, I must invoke my Fifth Amendment right.
17 BY MR. KUVIN:
18 Q. Who is Mya Dubin (phonetic)?
19 MR. RHEINHART: Same instruction.
20 THE WITNESS: On the instruction of my
21 lawyer I must invoke my Fifth Amendment right.
22 BY MR. KUVIN:
23 Q. Who is Chris Valdez (phonetic)?
24 MR. RHEINHART: Same instruction.
25 THE WITNESS: On the instruction of my

Page 42

1 lawyer I must invoke my Fifth Amendment right.
2 BY MR. KUVIN:
3 Q. Who is James Stanley?
4 MR. RHEINHART: Same instruction.
5 THE WITNESS: On the instruction of my
6 lawyer, I must invoke my Fifth Amendment right.
7 BY MR. KUVIN:
8 Q. Who is Sophia Stanley?
9 MR. RHEINHART: Same instruction.
10 THE WITNESS: On the instruction of my
11 lawyer I must invoke my Fifth Amendment right.
12 BY MR. KUVIN:
13 Q. Who is Alexis Stanley?
14 MR. RHEINHART: Same instruction.
15 THE WITNESS: On the instruction of my
16 lawyer, I must invoke my Fifth Amendment right.
17 BY MR. KUVIN:
18 Q. Ma'am, if you would, in Exhibit 3, would
19 you turn to the date of April 27, 2005, for me?
20 It's about halfway through the packet. April 27,
21 '05. Are you there?
22 A. Uh-huh.
23 Q. Okay. On this particular date, will you
24 agree with me that you flew from Teterboro,
25 New Jersey to West Palm Beach on a plane with people

Page 43

1 listed in the passenger list to the left?
2 MR. RHEINHART: Object to the form, the
3 question is leading and instruct the witness
4 not to answer based on the Fifth Amendment
5 privilege.
6 THE WITNESS: On the instruction of my
7 lawyer, I must invoke my Fifth Amendment right.
8 BY MR. KUVIN:
9 Q. Would you agree with me that you were on a
10 plane with Jeffrey Epstein on April 27, 2005?
11 MR. RHEINHART: Same instruction.
12 THE WITNESS: On the instruction of my
13 lawyer, I must invoke my Fifth Amendment right.
14 BY MR. KUVIN:
15 Q. Would you agree with me that on that plane
16 of April 27, 2005, from Teterboro, New Jersey, to
17 West Palm Beach, was a female who was under the age
18 of 16?
19 MR. RHEINHART: Object to the form. It
20 assumes facts not established. Any personal
21 knowledge by this witness, and instruct her not
22 to answer based on her Fifth Amendment
23 privilege. It also calls for speculation.
24 THE WITNESS: On the instruction of my
25 lawyer, I must invoke my Fifth Amendment

Page 44

1 privilege.
2 BY MR. KUVIN:
3 Q. Would you agree with me that on the flight
4 of April 27, 2005, from Teterboro, New Jersey to
5 West Palm Beach was a female on the plane with you
6 that was under the age of 15?
7 MR. RHEINHART: Object to the form of the
8 question. It requires speculation. It assumes
9 facts not established before this witness.
10 I'll instruct her not to answer based on her
11 Fifth Amendment privilege. It's also
12 ambiguous.
13 THE WITNESS: On the instruction of my
14 lawyer, I must invoke my Fifth Amendment
15 privilege.
16 BY MR. KUVIN:
17 Q. Will you turn to May 6, 2005, please. And
18 this is, for the record, in Exhibit 3. On May 6th,
19 2005, ma'am, will you agree with me that you took a
20 flight from Teterboro, New Jersey to West Palm
21 Beach, with Jeffrey Epstein, Nadia Marcinkova,
22 Andriana, Andrea Musinska, David Mullen, Larry
23 Morrison and another female?
24 MR. RHEINHART: Object to the form of the
25 question as compound, calling for speculation.

11 (Pages 41 to 44)

Page 45

Page 47

1 I instruct the witness not to answer based on
2 her Fifth Amendment privilege.

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

6 BY MR. KUVIN:

7 Q. Would you agree with me, ma'am, that on
8 the flight of May 6th, 2005, that's shown in
9 Exhibit 3, that the female identified in the
10 passenger manifest was under the age of 16?

11 MR. RHEINHART: Object to the form. It
12 assumes facts not established that this witness
13 has any personal knowledge. It calls for her
14 to speculate, and I'll instruct her not to
15 answer based on her Fifth Amendment privilege.

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

19 BY MR. KUVIN:

20 Q. Would you agree with me that the female
21 identified in the passenger manifest of May 6th,
22 2005, was under the age of 15?

23 MR. RHEINHART: Same objection as the
24 previous question, same instruction.

25 THE WITNESS: On the instruction of my

Page 46

1 lawyer I must invoke my Fifth Amendment
2 privilege.

3 BY MR. KUVIN:

4 Q. Would you agree with me that the female
5 listed in the passenger manifest of May 6th, 2005,
6 was under the age, was under the age of 14?

7 MR. RHEINHART: Same instruction as to the
8 previous two questions and the same objection
9 as to those two questions.

10 THE WITNESS: On the instruction of my
11 lawyer I must invoke my Fifth Amendment
12 privilege.

13 BY MR. KUVIN:

14 Q. If you would turn to the date of June 20
15 of 2005 for me, please. On the date of June 20,
16 2005, would you agree with me that you took a flight
17 with Jeffrey Epstein from West Palm Beach to
18 Teterboro, New Jersey?

19 MR. RHEINHART: Object to the form as
20 leading. I'll instruct the witness not to
21 answer based on her Fifth Amendment privilege.

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

1 BY MR. KUVIN:

2 Q. Do you also agree with me on that flight
3 of June 20th, 2005, was an unidentified female,
4 according to the passenger manifest?

5 MR. RHEINHART: Object to the form --
6 excuse me -- as leading, and instruct the
7 witness not to answer based on her Fifth
8 Amendment privilege.

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

12 BY MR. KUVIN:

13 Q. Would you agree with me that that female
14 listed on the flight of June 20, 2005, was under the
15 age of 16 years old?

16 MR. RHEINHART: Objection to the form as
17 leading and also requiring speculation. I'll
18 instruct the witness not to answer based on her
19 Fifth Amendment privilege.

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

23 BY MR. KUVIN:

24 Q. Would you agree with me that the
25 unidentified female on the passenger manifest of

Page 48

1 June 20, 2005, was under the age of 14?

2 MR. RHEINHART: Objection, calls for
3 speculation, instruct the witness not to answer
4 based on her Fifth Amendment privilege.

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

8 BY MR. KUVIN:

9 Q. Turn to the date of June 30, if you would,
10 2005. Would you agree with me that you took a
11 flight from Teterboro, New Jersey, to West Palm
12 Beach on June 30, 2005, with Jeffrey Epstein?

13 MR. RHEINHART: Object to the form as
14 leading and compound, instruct the witness not
15 to answer based on her Fifth Amendment
16 privilege.

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

20 BY MR. KUVIN:

21 Q. Would you agree with me that Dana Burns
22 was on that flight?

23 MR. RHEINHART: Same instruction.

24 THE WITNESS: On the instruction of my
25 lawyer I must invoke my Fifth Amendment

12 (Pages 45 to 48)

Page 49

1 privilege.

2 BY MR. KUVIN:

3 Q. Would you agree with me that there was
4 also another female on that flight with you?

5 MR. RHEINHART: Same instruction.

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

9 BY MR. KUVIN:

10 Q. Would you agree with me that you had
11 personal knowledge that that young female on that
12 flight with you of June 30, 2005, was under the age
13 of 16?

14 MR. RHEINHART: Object to the form as
15 compound and calling for speculation, and
16 instruct the witness not to answer based on her
17 Fifth Amendment privilege.

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

21 BY MR. KUVIN:

22 Q. Would you agree with me that you had
23 personal knowledge that that young female on the
24 flight of June 30, 2005, was under the age of 15?

25 MR. RHEINHART: Same instruction, calls

Page 50

1 for speculation.

2 THE WITNESS: On the instruction of my
3 lawyer, I must invoke my Fifth Amendment
4 privilege.

5 BY MR. KUVIN:

6 Q. Would you agree with me that you had
7 personal knowledge that that young female on the
8 flight of June 30, 2005, with you was under the age
9 of 14?

10 MR. RHEINHART: Objection to form as to
11 compound and requiring speculation. I'll
12 instruct the witness not to answer based on her
13 Fifth Amendment privilege.

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

17 BY MR. KUVIN:

18 Q. Ma'am, just so we can be quicker about
19 this, there are flights of July 5th, July 15. It
20 looks like those are the last two. Would you agree
21 with me that on July 5th and July 15, you took
22 flights on Jeffrey Epstein's plane?

23 MR. RHEINHART: Object to the form as
24 compound and instruct the witness not to answer
25 based on Fifth Amendment privilege.

Page 51

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 on both of
6 those flights were girls that were under the age of
7 16?

8 MR. RHEINHART: Same form objection as to
9 compound, also ambiguous and requiring
10 speculation and instruct the witness not to
11 answer based on her Fifth Amendment privilege.

12 THE WITNESS: The instruction of my lawyer
13 I must invoke my Fifth Amendment privilege.

14 BY MR. KUVIN:

15 Q. Would you agree with me, ma'am, that you
16 have flown on Jeffrey Epstein's plane from
17 Teterboro, New Jersey, to West Palm Beach, on
18 numerous occasions where there were girls on the
19 plane under the age of 16?

20 MR. RHEINHART: Object to the form as
21 compound and ambiguous as to what numerous
22 means. Instruct the witness not to answer
23 based on her Fifth Amendment privilege.

24 THE WITNESS: On the instruction of my
25 lawyer I must invoke my Fifth Amendment

Page 52

1 privilege.

2 BY MR. KUVIN:

3 Q. Would you agree with me that you have
4 flown on Jeffrey Epstein's plane from Teterboro, New
5 Jersey, to West Palm Beach on at least 100 occasions
6 where there were girls on the plane with you under
7 the age of 16?

8 MR. RHEINHART: Object to the form as
9 compound, requiring speculation and ambiguous,
10 and instruct her not to answer based on her
11 Fifth Amendment privilege.

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

15 BY MR. KUVIN:

16 Q. Would you agree with me, ma'am, that you
17 have flown on Jeffrey Epstein's plane at least 100
18 times from Teterboro, New Jersey to West Palm Beach,
19 Florida, where there were girls under the age of 15
20 on the plane with you?

21 MR. RHEINHART: Same objections as the
22 previous question, same instruction.

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

13 (Pages 49 to 52)

1 BY MR. KUVIN:

2 Q. Would you agree with me that you have
3 flown on Jeffrey Epstein's plane from Teterboro, New
4 Jersey to West Palm Beach on at least 100 occasions
5 where there were girls on the plane with you that
6 were under the age of 14?

7 MR. RHEINHART: Objection to the form.
8 It's compound and ambiguous, calls for
9 speculation and instruct her not to answer
10 based on her Fifth Amendment privilege.

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

14 BY MR. KUVIN:

15 Q. Would you agree with me that you have been
16 on the plane, one of Jeffrey Epstein's -- strike
17 that.

18 Would you agree with me that you have
19 been on Jeffrey Epstein's plane with him to Paris
20 where there have been girls on the plane with you
21 under the age of 16?

22 MR. RHEINHART: Objection to the form as
23 compound, assuming facts not established the
24 witness has any knowledge, and instruct the
25 witness not to answer based on her Fifth

1 Amendment privilege. It's also leading.

2 THE WITNESS: On the instruction of my
3 lawyer, I must invoke my Fifth Amendment
4 privilege.

5 BY MR. KUVIN:

6 Q. Would you agree with me that you have been
7 on the plane with Jeffrey Epstein on flights to
8 Paris where there have been girls on the plane with
9 you under the age of 15?

10 MR. RHEINHART: Same objection and same
11 instruction as the previous question.

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

15 BY MR. KUVIN:

16 Q. Would you agree with me that you have been
17 on those same flights we have been discussing where
18 there have been girls under the age of 14?

19 MR. RHEINHART: Same instruction and same
20 objection as the previous two questions.

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

24 BY MR. KUVIN:

25 Q. Would you agree with me that on the

1 occasions where Jeffrey Epstein was flying with
2 young girls under the age of 16 from Teterboro, New
3 Jersey, to Florida, West Palm Beach, Florida, with
4 girls under the age of 16, was doing so, so that he
5 could have sexual contact with them?

6 MR. RHEINHART: Object to the form. It's
7 compound and requires her to assume facts that
8 have not been established, and it's ambiguous,
9 and instruct her not to answer based on the
10 Fifth Amendment privilege.

11 THE WITNESS: On the instruction of my
12 lawyer, I must assert my Fifth Amendment right.

13 BY MR. KUVIN:

14 Q. Do you agree with me that on the flights
15 from West Palm Beach to Paris, where you were
16 present on the plane with Jeffrey Epstein, that
17 there were girls under the age of 16 that
18 Jeffrey Epstein was having sexual contact with on
19 that plane?

20 MR. RHEINHART: Same objections as
21 previously stated. It's compound, ambiguous,
22 and assumes facts that she has no knowledge, or
23 it has not been established that she has any
24 knowledge of, and instruct her not to answer
25 based on the Fifth Amendment, and it's leading.

1 THE WITNESS: On the instruction of my
2 lawyer I must invoke my Fifth Amendment right.

3 BY MR. KUVIN:

4 Q. Ma'am, you've been on the plane, you've
5 been on a plane with Jeffrey Epstein in the past,
6 have you not?

7 MR. RHEINHART: Objection to the form as
8 leading, and instruct her not to answer based
9 on the Fifth Amendment privilege.

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

13 BY MR. KUVIN:

14 Q. Have you been on a plane with
15 Jeffrey Epstein ever in your entire life?

16 MR. RHEINHART: Instruct the witness not
17 to answer based on her Fifth Amendment right.

18 THE WITNESS: On the instruction of my
19 lawyer I must invoke my Fifth Amendment
20 privilege.

21 BY MR. KUVIN:

22 Q. Have you ever been on a plane with
23 Jeffrey Epstein where there was a girl on the plane
24 with you under the age of 14?

25 MR. RHEINHART: Same instruction.

Page 57

Page 59

1 THE WITNESS: On the instruction of my
2 lawyer, I must invoke my Fifth Amendment
3 privilege.

4 BY MR. KUVIN:

5 Q. Ma'am, isn't it true that you've seen
6 Jeffrey Epstein have sex with girls under the age of
7 14 on his plane?

8 MR. RHEINHART: Objection to the form. It
9 assumes facts that it's not been established
10 that she would have any knowledge of, and I'll
11 instruct her not to answer based on her Fifth
12 Amendment right.

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

16 BY MR. KUVIN:

17 Q. Would you agree with me that you've seen
18 Jeffrey Epstein have sex with girls on his plane in
19 your presence during flights to Paris?

20 MR. RHEINHART: Same objection previously
21 stated, and it assumes facts that have not been
22 established and instruct her not to answer
23 based on her Fifth Amendment right.

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

1 MR. RHEINHART: Same objection as stated
2 to the previous question; it's ambiguous and
3 instruct her not to answer based on the Fifth
4 Amendment.

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

7 MR. KUVIN: Just to clarify, is the
8 ambiguity the word "sex"?

9 MR. RHEINHART: Sex and also assumes that
10 she's ever met Jeffrey Epstein in her life.

11 MR. KUVIN: Any other words in there I
12 need to clarify?

13 MR. RHEINHART: No.

14 BY MR. KUVIN:

15 Q. Okay. Ma'am, do you -- what's your
16 definition of the word "sex"?

17 MR. RHEINHART: Object to the form of the
18 question and instruct the witness not to answer
19 based on her Fifth Amendment privilege.

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

22 BY MR. KUVIN:

23 Q. Would you agree with me that the word
24 "sex" means both vaginal intercourse as well as oral
25 sex? Would you agree with that definition?

Page 58

Page 60

1 privilege.

2 BY MR. KUVIN:

3 Q. Ma'am, isn't it true that you've seen
4 Jeffrey Epstein and Jean-Luc Brunel have sex with
5 girls under the age of 14 on Mr. Epstein's plane on
6 flights to Paris?

7 MR. RHEINHART: Objection to the form.
8 It's compound, as to several answers all at the
9 same time and certain facts, and instruct her
10 not to answer based on her Fifth Amendment.

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

14 BY MR. KUVIN:

15 Q. Ma'am, isn't it true that you have had sex
16 with Jeffrey Epstein on his plane?

17 MR. RHEINHART: Instruct the witness not
18 to answer based on the Fifth Amendment
19 privilege, also object to the form of the
20 question as compound and ambiguous.

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

23 BY MR. KUVIN:

24 Q. Isn't it true that you've had sex with
25 Jeffrey Epstein on his plane on flights to Paris?

1 MR. RHEINHART: You can answer that.

2 THE WITNESS: No.

3 BY MR. KUVIN:

4 Q. Okay. Would you agree with me that sex,
5 for the purpose of our questions here today, will be
6 limited strictly to vaginal intercourse?

7 A. Sorry. Can you repeat that?

8 Q. Yes. For the purpose of my questions here
9 today, will you agree that the word "sex" will be
10 limited to vaginal intercourse between a man's penis
11 and a woman's vagina?

12 MR. RHEINHART: If you're instructing her
13 that in the future she should assume that
14 that's what you mean by your question, that's
15 fine.

16 MR. KUVIN: Okay.

17 MR. RHEINHART: If that's what you mean,
18 then that's understood.

19 MR. KUVIN: That's what I mean.

20 MR. RHEINHART: Okay.

21 MR. KUVIN: All right. Let's go with that
22 definition. And for the purposes of my
23 questions, "oral sex" will mean contact between
24 an individual's mouth and a man's sexual organ,
25 penis. Fair enough?

15 (Pages 57 to 60)

Page 61

Page 63

1 MR. RHEINHART: Understood.
 2 MR. KUVIN: Okay.
 3 BY MR. KUVIN:
 4 Q. Working with those definitions if we
 5 could, would you agree with me that you had sex with
 6 Jeffrey Epstein on his plane?
 7 MR. RHEINHART: Objection to the form.
 8 It's compound and instruct her not to answer
 9 based on the Fifth Amendment privilege, because
 10 to do so would implicitly admit that she's ever
 11 met Jeffrey Epstein in her life, and so as to
 12 that she's invoking the Fifth Amendment
 13 privilege.
 14 THE WITNESS: On the instruction of my
 15 lawyer, I must invoke my Fifth Amendment
 16 privilege.
 17 BY MR. KUVIN:
 18 Q. Would you agree with me that you have had
 19 oral sex with Jeffrey Epstein on his plane?
 20 MR. RHEINHART: Same objection stated to
 21 the previous question. It's compound and it
 22 assumes facts that's not been established as to
 23 which she is invoking her Fifth Amendment
 24 privilege.
 25 THE WITNESS: On the instruction of my

1 Mr. Epstein's residence, as to her knowledge of
 2 Mr. Epstein and other facts as to which she's
 3 invoking her Fifth Amendment privilege.
 4 THE WITNESS: On the instruction of my
 5 lawyer, I must to invoke my Fifth Amendment
 6 privilege.
 7 MR. KUVIN: Let me show you what we'll
 8 mark as Exhibit 6. And this one I'm going to
 9 show it to the camera real briefly, if I could.
 10 Okay.
 11 MR. RHEINHART: Let me see it. Thank you.
 12 (Plaintiff's Exhibit No. 6 was marked for
 13 identification.)
 14 BY MR. KUVIN:
 15 Q. Ma'am, do you recognize any of the girls
 16 shown in Exhibit 6?
 17 MR. RHEINHART: I'll instruct the witness
 18 not to answer based on her Fifth Amendment
 19 privilege.
 20 THE WITNESS: On the instruction of my
 21 lawyer, I must invoke my Fifth Amendment right.
 22 BY MR. KUVIN:
 23 Q. Would you agree with me that that is you
 24 on the right in this photograph, the far right?
 25 MR. RHEINHART: I'll instruct the witness

Page 62

Page 64

1 lawyer, I must invoke my Fifth Amendment
 2 privilege.
 3 BY MR. KUVIN:
 4 Q. Would you agree with me that you have had
 5 sex with Jeffrey Epstein in his home --
 6 MR. RHEINHART: Object to the --
 7 MR. KUVIN: -- here in West Palm, in West
 8 Palm Beach?
 9 MR. RHEINHART: I'll instruct the witness
 10 not to answer based on her Fifth Amendment
 11 privilege and same objection previously stated
 12 to the last two questions.
 13 THE WITNESS: On the instruction of my
 14 lawyer, I must invoke my Fifth Amendment
 15 privilege.
 16 BY MR. KUVIN:
 17 Q. Would you agree with me that you have had
 18 oral sex with Jeffrey Epstein in his home in West
 19 Palm Beach?
 20 MR. GARCIA: Is it West, or Palm Beach?
 21 MR. KUVIN: Palm Beach Island, I think
 22 it's, because -- yeah, for clarity, his home on
 23 Palm Beach.
 24 MR. RHEINHART: Object to the form. It
 25 assumes facts as to her knowledge of

1 not to answer.
 2 THE WITNESS: On the instruction of my
 3 lawyer, I must invoke my Fifth Amendment
 4 privilege.
 5 BY MR. KUVIN:
 6 Q. Would you agree with me that that is
 7 Nadia Marcinkova on the left in that photograph that
 8 we marked as Exhibit 6?
 9 MR. RHEINHART: Same instruction.
 10 THE WITNESS: On the instruction of my
 11 lawyer, I must invoke my Fifth Amendment
 12 privilege.
 13 BY MR. KUVIN:
 14 Q. How old are you in this photograph?
 15 MR. RHEINHART: Same instruction.
 16 THE WITNESS: On the instruction of my
 17 lawyer, I must invoke my Fifth Amendment
 18 privilege.
 19 BY MR. KUVIN:
 20 Q. How old is Nadia Marcinkova in this
 21 photograph, if you know?
 22 MR. RHEINHART: I'm going to object to the
 23 form in that it assumes facts as to her
 24 knowledge of anything about Ms. Marcinkova, and
 25 as to which she is invoking her Fifth Amendment

16 (Pages 61 to 64)

Page 65

1 privilege.

2 THE WITNESS: On the instruction of my
3 lawyer, I must invoke my Fifth Amendment
4 privilege.

5 MR. KUVIN: This is Exhibit 7. Let me
6 show you what we'll mark as Exhibit 7.

7 (Plaintiff's Exhibit No. 7 was marked for
8 identification.)

9 BY MR. KUVIN:

10 Q. Do you recognize the girl that's shown in
11 Exhibit 7?

12 MR. RHEINHART: I need to consult with her
13 one second.

14 MR. KUVIN: Sure.

15 THE VIDEOGRAPHER: Are we off the record?

16 MR. KUVIN: No, no.

17 MR. RHEINHART: Instruct the witness to
18 invoke her Fifth Amendment privilege as to
19 Exhibit 7.

20 MR. KUVIN: She's clipped up. Okay.

21 MR. RHEINHART: Now you have to answer.

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

24 BY MR. KUVIN:

25 Q. Would you agree with me that the girl

Page 67

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 Haley Robson
6 has been to Mr. Epstein's home on hundreds of
7 occasions?

8 MR. RHEINHART: Object to the form as
9 compound and also assumes knowledge as this
10 witness has and instruct her to invoke her
11 Fifth Amendment privilege relating to
12 Ms. Robson.

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

16 BY MR. KUVIN:

17 Q. Would you agree with me that you directed
18 Haley Robson on hundreds of occasions to bring girls
19 under the age of 16 to Mr. Epstein's house?

20 MR. RHEINHART: Object to the form of the
21 question as compound and ambiguous and assuming
22 facts as to which there is no factual basis
23 that this witness has any knowledge and
24 instruct the witness not to answer based on her
25 Fifth Amendment privilege.

Page 66

1 shown in Exhibit 7 is Haley Robson?

2 MR. RHEINHART: Instruct the witness not
3 to answer based on the Fifth Amendment
4 privilege.

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

8 BY MR. KUVIN:

9 Q. Do you agree with me that Haley Robson was
10 under the age of 16 when she was first asked to go
11 to Mr. Epstein's home?

12 MR. RHEINHART: Objection to the form. It
13 assumes any knowledge by this witness as to the
14 person you identified as Haley Robson. It's
15 compound and I would instruct her not to answer
16 based on her Fifth Amendment privilege.

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

20 BY MR. KUVIN:

21 Q. Would you agree with me that you know
22 personally Haley Robson?

23 MR. RHEINHART: Instruct the witness not
24 to answer based on the Fifth Amendment
25 privilege.

Page 68

1 THE WITNESS: On the instruction of my
2 lawyer, I must choose to invoke my Fifth
3 Amendment right.

4 BY MR. KUVIN:

5 Q. Would you agree with me that on hundreds
6 of occasions you directed Haley Robson to bring
7 underage girls under the age of 16 to Mr. Epstein's
8 home for sex with Mr. Epstein?

9 MR. RHEINHART: Object to the form. It's
10 compound and it assumes facts as to this --
11 that this witness has no personal knowledge,
12 and it's been established by this record, and
13 instruct her to invoke her Fifth Amendment
14 privilege.

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

18 MR. KUVIN: We'll mark this as Exhibit 8.
19 (Plaintiff's Exhibit No. 8 was marked for
20 identification.)

21 BY MR. KUVIN:

22 Q. Ma'am, do you recognize the person that's
23 shown in Exhibit 8?

24 MR. RHEINHART: Let me consult one second.
25 MR. KUVIN: Sure.

17 (Pages 65 to 68)

Page 69

Page 71

1 MR. RHEINHART: I instruct the witness not
2 to answer the question based on her Fifth
3 Amendment privilege.

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

7 BY MR. KUVIN:

8 Q. Would you agree with me that the person
9 shown on Exhibit 8 is you?

10 MR. RHEINHART: Same instruction.

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

14 BY MR. KUVIN:

15 Q. Would you agree with me that this is a
16 modeling shot of you that was taken through one of
17 Mr. Epstein's modeling agencies?

18 MR. RHEINHART: Object to the form of the
19 question as compound and assuming facts as to
20 which there has been no basis that this witness
21 has any personal knowledge, and she's going
22 to invoke her Fifth Amendment privilege.

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

1 MR. GARCIA: He didn't make a Fifth
2 Amendment objection. So can we just rephrase
3 the question?

4 MR. RHEINHART: I would instruct the
5 witness not to answer based on the Fifth
6 Amendment privilege to clarify.

7 MR. KUVIN: Okay. Let's mark this as
8 Exhibit 9.

9 MR. RHEINHART: And for the record, the
10 basis is that it assumes her knowledge of
11 anything relating to Jeffrey Epstein, the
12 question assumed that.

13 (Plaintiff's Exhibit No. 9 was marked for
14 identification.)

15 BY MR. KUVIN:

16 Q. Ma'am, do you recognize the girl shown in
17 Exhibit 9?

18 MR. RHEINHART: I'll instruct the witness
19 not to answer based on her Fifth Amendment
20 privilege.

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

23 BY MR. KUVIN:

24 Q. Would you agree with me that the girl
25 shown in Exhibit 9 is Nadia Marcinkova?

Page 70

Page 72

1 BY MR. KUVIN:

2 Q. Would you agree with me that you were
3 under the age of 18 in this photograph we've marked
4 as Exhibit 8?

5 MR. RHEINHART: Same objection as to the
6 previous question and same instruction.

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

9 BY MR. KUVIN:

10 Q. Would you agree with me that you were
11 under the age of 17 in this photograph that we've
12 marked as Exhibit 8?

13 MR. RHEINHART: Same objection as the
14 previous two questions and the same instruction.

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

17 BY MR. KUVIN:

18 Q. Would you agree with me that Jeffrey
19 Epstein kept this photograph of you in his home, if
20 you know.

21 MR. RHEINHART: Object to the form of the
22 question as compound and ambiguous, and I would
23 instruct the witness not to answer.

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

1 MR. RHEINHART: Same instruction.

2 THE WITNESS: On the instruction of my
3 lawyer, I must invoke my Fifth Amendment
4 privilege.

5 MR. KUVIN: I forgot to do one more thing.
6 If you could give that back to me for just one
7 second just for the record so we can see what
8 we're talking about here.

9 Okay. I will give you back Exhibit
10 9.

11 MR. RHEINHART: Thank you.

12 BY MR. KUVIN:

13 Q. Would you agree with me that this
14 photograph of Nadia Marcinkova was taken when she
15 was under the age of 18?

16 MR. RHEINHART: Objection to the form. It
17 assumes this witness has any knowledge that the
18 person in the photograph is, in fact, Nadia
19 Marcinkova. Therefore, it's ambiguous and
20 compound, and I'll instruct her not to answer
21 based on her Fifth Amendment privilege.

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

24 BY MR. KUVIN:

25 Q. Would you agree with me that the girl

18 (Pages 69 to 72)

Page 73

1 shown in that photograph -- strike that.
2 Would you agree with me that this
3 photograph was kept by Jeffrey Epstein in his home?

4 MR. RHEINHART: Objection to the form as
5 to being compound in that it assumes that she
6 has any knowledge of Jeffrey Epstein or his
7 home, and I would instruct her not to answer
8 based on her Fifth Amendment.

9 THE WITNESS: On the instruction of my
10 lawyer, I must invoke my Fifth Amendment right.
11 BY MR. KUVIN:

12 Q. Would you agree with me that
13 Nadia Marcinkova was under the age of 16 when this
14 photograph was taken in Exhibit 9?

15 MR. RHEINHART: Objection to the form as
16 compound and also assuming this witness has any
17 knowledge that the person in the photograph is,
18 in fact, Nadia Marcinkova. Therefore, I would
19 instruct her to invoke her Fifth Amendment
20 privilege.

21 THE WITNESS: On the instruction of my
22 lawyer, I must invoke my Fifth Amendment right.
23 BY MR. KUVIN:

24 Q. Ma'am, is Jeffrey Epstein paying for your
25 attorney today?

Page 74

1 MR. RHEINHART: I'll instruct the witness
2 not to answer based on her Fifth Amendment
3 privilege.

4 THE WITNESS: On the instruction of my
5 lawyer, I must invoke my Fifth Amendment right.
6 BY MR. KUVIN:

7 Q. Ma'am, is Jeffrey Epstein paying for you
8 to keep quiet with respect to the things he has done
9 to underage girls?

10 MR. RHEINHART: Objection to the form in
11 that it's ambiguous and compound, also assumes
12 this witness has any knowledge at all of
13 Jeffrey Epstein, and therefore I am instructing
14 her to invoke her Fifth Amendment privilege.

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

18 BY MR. KUVIN:

19 Q. Ma'am, how much is Jeffrey Epstein paying
20 you to keep quiet with respect to things he's done
21 to underage girls?

22 MR. RHEINHART: Object to the form as
23 multiple compound questions, and it's again
24 assuming this witness has any knowledge at all
25 of Jeffrey Epstein. Since the question

Page 75

1 implicitly assumes that she does, I would
2 instruct her not to answer it based on her
3 Fifth Amendment privilege.

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

7 BY MR. KUVIN:

8 Q. Ma'am, are you aware of the effect, the
9 emotional effect on the underage girls that have
10 been abused by Jeffrey Epstein? Are you aware of
11 the emotional effect that it's had on the underage
12 girls that have been abused by Jeffrey Epstein?

13 MR. RHEINHART: Objection to the form as
14 to, again, the question assumes this witness
15 has any knowledge, first, of Jeffrey Epstein,
16 second that Jeffrey Epstein has sexually abused
17 anyone ever, and third, that anyone has been
18 damaged by anything that Jeffrey Epstein has
19 done, and fourth, that she would somehow have
20 any knowledge of these people's emotional
21 situations. For all those reasons, the
22 question is ambiguous and compound, and I would
23 instruct her not to answer based on her Fifth
24 Amendment.

25 THE WITNESS: Upon the instruction of my

Page 76

1 lawyer, I must invoke my Fifth Amendment right.
2 BY MR. KUVIN:

3 Q. Ma'am, do you have any regret for what
4 you've done?

5 MR. RHEINHART: Objection to the form.
6 That question is not designed to lead to
7 discoverable evidence. It's meant solely for
8 the purpose of harassment, and I would instruct
9 her not to answer.

10 BY MR. KUVIN:

11 Q. Ma'am, do you have any regrets for what
12 Jeffrey Epstein has done through you in obtaining
13 underage girls for sexual abuse?

14 MR. RHEINHART: Same objection as the
15 previous question as well as that question is
16 now free to assume this witness has any
17 knowledge at all of Jeffrey Epstein or
18 Jeffrey Epstein having abused any underage
19 women or girls or anything else that
20 Jeffrey Epstein may ever have done.

21 And therefore, since it assumes that
22 fact, I would instruct her not to answer
23 based on her Fifth Amendment.

24 BY MR. KUVIN:

25 Q. Are you scared of Jeffrey Epstein?

19 (Pages 73 to 76)

Page 77

Page 79

MR. KUVIN: I'm sorry, you had to respond.
I cut you off.

THE WITNESS: Upon the instruction of my
lawyer, I must invoke my Fifth Amendment right.
BY MR. KUVIN:

Q. Are you scared of Jeffrey Epstein?

MR. RHEINHART: Objection to the form in
that it assumes this witness has ever met
Jeffrey Epstein in her life. Because it
assumes that, I would instruct her not to
answer based on the Fifth Amendment.

THE WITNESS: On the instruction of my
lawyer, I must invoke my Fifth Amendment right.
BY MR. KUVIN:

Q. Are you aware of Jeffrey Epstein's sexual
obsession for children?

MR. RHEINHART: Same instructions as the
previous question, also objection to the
question. It's not designed to lead to any
discoverable evidence at all. It's simply
meant for harassment.

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

lawyer, and I must invoke my Fifth Amendment
privilege.

BY MR. KUVIN:

Q. Do you know who Les Wexner is?

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

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

BY MR. KUVIN:

Q. Do you know whether or not Mr. Epstein has
had a homosexual relationship with Les Wexner in the
past?

MR. RHEINHART: Objection to the form in
that it again assumes that this witness knows
anything at all about Jeffrey Epstein or has
ever met Jeffrey Epstein in her life, and
therefore, I would instruct her not to answer
based on her Fifth Amendment privilege, and the
question is compound and ambiguous.

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

Page 78

Page 80

BY MR. KUVIN:

Q. At what point did you realize that
Jeffrey Epstein was sexually attracted to girls
under the age of 18?

MR. RHEINHART: Once again, the question
assumes this witness knows anything at all
about Jeffrey Epstein, underage women, sexual
abuse of underage women, and she's not going to
answer any questions that assume that as a
predicate. They are objectionable as ambiguous
and compound, and I instruct her not to answer.

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

BY MR. KUVIN:

Q. Are you aware whether or not
Jeffrey Epstein has had any homosexual relationships
in the past?

MR. RHEINHART: Same objection as the
previous question. The question as stated
assumes this witness has some knowledge of
Jeffrey Epstein. And since it assumes that
fact, it is ambiguous and it's compound, and I
instruct her not to answer.

THE WITNESS: On the instruction of my

BY MR. KUVIN:

Q. Do you know the magician by the name
David Copperfield?

MR. RHEINHART: I'll instruct the witness
not to answer based on her Fifth Amendment
right.

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

BY MR. KUVIN:

Q. You are aware, are you not, that
David Copperfield has visited Jeffrey Epstein's home
in Palm Beach?

MR. RHEINHART: Objection to the form as
it once again assumes she has some knowledge of
Jeffrey Epstein, or whether he has a home in
Palm Beach. Because those facts are implicit
in the question, the question is ambiguous and
compound. I would instruct her not to answer
based on her Fifth Amendment.

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

BY MR. KUVIN:

Q. You are aware, are you not, that

20 (Pages 77 to 80)

Page 81

1 David Copperfield and Jeffrey Epstein used to share
2 for sexual -- for sex, girls under the age of 16?

3 MR. RHEINHART: Same objection as
4 previously stated to the last I don't know how
5 many questions. This question again assumes
6 this witness knows Jeffrey Epstein, has any
7 knowledge of Jeffrey Epstein's life. And
8 because it assumes that fact, there is an
9 underlying predicate it is ambiguous and
10 compound. I would instruct her not to answer.

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

14 BY MR. KUVIN:

15 Q. From the time you met Mr. Epstein, isn't
16 it true that he would arrange for underage girls,
17 girls under the age of 18, to have sex with every
18 single day?

19 MR. RHEINHART: Let me try this again.
20 Objection to the form. Any question you're
21 going to ask her that assumes she knows
22 Jeffrey Epstein, she's ever met Jeffrey
23 Epstein, she's ever seen Jeffrey Epstein, knows
24 where he lives, knows what he does, if it
25 assumes that as part of the question, I will

Page 82

1 deem the question to be ambiguous and compound,
2 because you're asking her to admit as a
3 predicate that she knows Mr. Epstein. As to
4 any question like that, I am going to instruct
5 her to take the Fifth Amendment on that basis.
6 So I would again instruct her to take the Fifth
7 Amendment as to that question.

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

11 MR. KUVIN: If you want to short circuit
12 that, anytime I mention Jeffrey Epstein you can
13 have a standing objection on that issue. I
14 have no problem.

15 MR. RHEINHART: Great.

16 BY MR. KUVIN:

17 Q. Can you explain, if you would, to a jury
18 how Mr. Epstein would access underage minor females
19 for sex every day?

20 MR. RHEINHART: The question is compound
21 in that it asks about Mr. Epstein every day,
22 underage females, and involves multiple
23 questions in the same question, and also based
24 on the standing objection, I would instruct her
25 not to answer based on her Fifth Amendment

Page 83

1 privilege.

2 THE WITNESS: On the instruction of my
3 lawyer, I must invoke my Fifth Amendment
4 privilege.

5 BY MR. KUVIN:

6 Q. How many people did Jeffrey Epstein use to
7 help him bring minor females to his house in Palm
8 Beach for sex?

9 MR. RHEINHART: Same objection as the
10 previous question and I instruct her not to
11 answer.

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

15 BY MR. KUVIN:

16 Q. Do you agree that Jeffrey Epstein is a
17 child molester?

18 MR. RHEINHART: That question is solely
19 intended to harass the witness and it's
20 ambiguous as to what a child molester means,
21 and you're asking for a legal conclusion and
22 instruct her not to answer.

23 BY MR. KUVIN:

24 Q. In your own opinion.

25 MR. RHEINHART: I will again instruct her

Page 84

1 not to answer based on her Fifth Amendment
2 privilege as well as the question having no
3 legitimate basis and will not lead to
4 discoverable evidence.

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

8 BY MR. KUVIN:

9 Q. Would you agree that Jeffrey Epstein is
10 obsessed with underage females?

11 MR. RHEINHART: Objection to the form.
12 It's ambiguous as to what you mean by
13 "obsessed." I'll instruct the witness not to
14 answer based on her Fifth Amendment privilege,
15 because the question assumes knowledge of
16 Jeffrey Epstein.

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

20 BY MR. KUVIN:

21 Q. How would you define the word "obsessed"?

22 MR. RHEINHART: You can answer that.

23 THE WITNESS: I don't know. You like it a
24 lot. I don't know.
25

21 (Pages 81 to 84)

Page 85

1 BY MR. KUVIN:

2 Q. Okay. Using your definition of obsessed,
3 would you agree with me that Jeffrey Epstein was
4 obsessed with underage females?

5 MR. RHEINHART: Same objection; same
6 instruction.

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

10 BY MR. KUVIN:

11 Q. When was the first time that you learned
12 Mr. Epstein was getting a massage from a girl under
13 the age of 16?

14 MR. RHEINHART: One second.

15 MR. KUVIN: Sure.

16 MR. RHEINHART: I want to make the
17 standing objection for the reasons previously
18 stated, the question is otherwise also compound
19 in that it assumes multiple facts and asks her
20 to answer multiple questions at the same time.
21 I'll instruct her not to answer based on her
22 Fifth Amendment.

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

Page 86

1 BY MR. KUVIN:

2 Q. Do you know who owns the home at 358
3 El Brillo Way?

4 MR. RHEINHART: Same instructions as to
5 the standing objection.

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

9 BY MR. KUVIN:

10 Q. Have you been on Palm Beach Island before?

11 MR. RHEINHART: I am sorry. Can you
12 restate the question?

13 MR. KUVIN: Sure.

14 BY MR. KUVIN:

15 Q. Have you been on the Island of Palm Beach
16 before?

17 MR. RHEINHART: You can answer that yes or
18 no.

19 THE WITNESS: Yes.

20 BY MR. KUVIN:

21 Q. How many times?

22 MR. RHEINHART: I'll instruct her not to
23 answer that question based on her Fifth
24 Amendment privilege.

25 THE WITNESS: On the instruction of my

Page 87

1 lawyer, I must invoke my Fifth Amendment
2 privilege.

3 BY MR. KUVIN:

4 Q. Did you keep a journal with the names of
5 girls in it in the year 2005?

6 MR. RHEINHART: Objection to the form as
7 ambiguous. What do you mean by "journal"?

8 MR. KUVIN: I will define it.

9 MR. RHEINHART: Please.

10 BY MR. KUVIN:

11 Q. Did you keep a pad of paper, either a
12 ringed notebook or some other format with the names
13 of girls and their phone numbers in it in 2005?

14 MR. RHEINHART: I'll instruct the witness
15 not to answer based on her Fifth Amendment
16 privilege. Also the question remains
17 ambiguous.

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

21 BY MR. KUVIN:

22 Q. Would you agree with me that you kept a
23 pad of paper or a journal, however you want to
24 describe it, that contain the names of hundreds of
25 underage girls and their phone numbers?

Page 88

1 MR. RHEINHART: Object to the form of the
2 question. It's compound and asking her to
3 answer multiple questions at the same time.
4 It's also leading, and I would instruct her not
5 to answer based on her Fifth Amendment.

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

8 BY MR. KUVIN:

9 Q. Would you agree with me that you kept a
10 pad of paper, notebook, or journal with the names of
11 hundreds of girls under the age of 16 so that you
12 could contact them and have them come to
13 Jeffrey Epstein's home for sex with him?

14 MR. RHEINHART: Objection to the form as
15 compound and ambiguous, and I'll instruct her
16 not to answer based on Fifth Amendment.

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

20 BY MR. KUVIN:

21 Q. Do you know Alfredo Rodriguez?

22 MR. RHEINHART: I'll instruct the witness
23 not to answer based on her Fifth Amendment
24 privilege.

25 THE WITNESS: On the instruction of my

22 (Pages 85 to 88)

Page 89

Page 91

1 lawyer, I must invoke my Fifth Amendment
2 privilege.

3 BY MR. KUVIN:

4 Q. Are you aware that Alfredo Rodriguez has
5 pled guilty to federal charges for hiding a journal
6 containing the names of women?

7 MR. RHEINHART: Objection to the form as
8 compound and instruct her not to answer.

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

12 BY MR. KUVIN:

13 Q. Do you have a personal fear of criminal
14 prosecution as you sit here today?

15 MR. RHEINHART: I instruct the witness --
16 object to the form. That's the whole basis why
17 one would invoke the Fifth Amendment so clearly
18 she's does. I am not going to have her answer
19 the question. It's solely meant to harass.

20 MR. KUVIN: So is she not going to answer
21 that question?

22 MR. RHEINHART: She's not going to answer
23 that question.

24 MR. KUVIN: I think what I need to
25 establish is that she personally has a fear,

1 prosecution by either the State or the federal
2 government?

3 MR. RHEINHART: She's not answering that
4 question. She's not required to answer the
5 question. She's invoked her Fifth Amendment
6 privilege. She will continue to do so as to
7 that question. You can move on.

8 BY MR. KUVIN:

9 Q. Ma'am, are you invoking your Fifth
10 Amendment because your lawyer is advising you to
11 invoke your Fifth Amendment, or because you
12 personally have a fear that you might be prosecuted
13 by either the state or the federal government?

14 MR. RHEINHART: We have now been down this
15 street four times. She's not going to answer
16 the question. You can move along or we can
17 leave.

18 MR. KUVIN: I am just clarifying the
19 question, and I appreciate it. And you can
20 object. I just want to make sure that I have a
21 clear record of every possible machination of
22 the question so that I don't get hit later with
23 you didn't ask the specific question you need
24 to ask. So, I'm not doing it certainly to
25 harass. I just want to make sure that the

Page 90

Page 92

1 not her lawyer. So I would like to establish
2 whether the witness has a personal fear.

3 MR. RHEINHART: Well, first of all, under
4 the Fifth Amendment you don't have to be in
5 fear. You just have to believe that the
6 government believes you can be prosecuted for
7 something. She's been invoking the Fifth
8 Amendment on her own. It is implicit in her
9 invocation in what she fears. She's not going
10 to answer that question.

11 MR. KUVIN: Well, I tend to disagree. She
12 hasn't been invoking it on her own. She's been
13 invoking it after you have instructed her to
14 invoke it. So I want to know her personal --

15 MR. RHEINHART: You can take that up with
16 the judge then. She's not answering the
17 question. She's invoking her Fifth Amendment
18 on her own accord based on the advice of her
19 lawyer. And you can take it up somewhere else,
20 but she's not answering that question.

21 MR. KUVIN: Well, then let me clarify the
22 record.

23 BY MR. KUVIN:

24 Q. Ma'am, are you invoking your Fifth
25 Amendment because you personally have a concern of

1 record is very clear of my question.

2 MR. RHEINHART: I understand. You can
3 move on.

4 BY MR. KUVIN:

5 Q. Ma'am, have you had any direct
6 communications with the State Attorney's office in
7 the last two years?

8 MR. RHEINHART: When you say "direct
9 communications," can you clarify?

10 MR. KUVIN: Yes.

11 BY MR. KUVIN:

12 Q. You, personally, have you spoken with
13 anyone in the State Attorney's office in the last
14 two years?

15 MR. KUVIN: I can't imagine there would be
16 a Fifth Amendment for that.

17 MR. RHEINHART: Let me consult. If I
18 might. Okay?

19 MR. KUVIN: Sure.

20 MR. RHEINHART: It would all depend on
21 what was said to her if she could consult with
22 them now. For example, if they consulted and
23 they told her they were about to prosecute,
24 then there could be a Fifth Amendment claim,
25 couldn't there?

23 (Pages 89 to 92)

Page 93

1 MR. KUVIN: No, not as to the statements
2 they told her. I mean, that's certainly not
3 Fifth Amendment. That's something that was
4 told to her.

5 MR. RHEINHART: We'll take that up
6 elsewhere if you need to. You can answer.

7 MR. KUVIN: Okay.

8 THE WITNESS: No, I have not.

9 BY MR. KUVIN:

10 Q. All right. Ma'am, have you had any
11 personal communications with anyone working for the
12 federal government in the last two years?

13 MR. RHEINHART: When you say "the federal
14 government" do you mean the postal service, the
15 entire federal government, or do you want to
16 clarify that?

17 MR. KUVIN: Well, I certainly could leave
18 it open-ended. If she's talked to a post
19 office employee, that would be interesting, but
20 certainly not to this case.

21 BY MR. KUVIN:

22 Q. Let's talk about the U.S. Attorney's
23 Office or anyone working on behalf of the U.S.
24 Attorney's Office.

25 A. Have I personally ever spoken to anyone?

Page 94

1 Q. Yes, ma'am, personally have you ever had
2 any conversations with anyone at the U.S. Attorney's
3 Office or one of their -- one -- a person
4 representing to be from that office in the last two
5 years.

6 A. No.

7 Q. Okay. Do you know, as you sit here today,
8 whether or not you ever were requested to give a
9 statement by the State Attorney's office for the
10 Palm Beach Police Department?

11 MR. RHEINHART: May I consult?

12 MR. KUVIN: Yes.

13 MR. RHEINHART: You may answer. And for
14 the record, I was just determining whether the
15 answer to that question would be protected by
16 the attorney-client privilege.

17 MR. KUVIN: Understood.

18 THE WITNESS: No, I don't. I don't know.

19 BY MR. KUVIN:

20 Q. Let me clarify the last two questions I
21 asked about the State Attorney's Office and the U.S.
22 Attorney's Office. Have you spoken with anybody
23 personally at the State Attorney's Office in the
24 last five years?

25 A. No.

Page 95

1 Q. Have you spoken with anybody at the U.S.
2 Attorney's Office in the last five years?

3 A. No.

4 Q. Have you spoken with anyone at the FBI in
5 the last five years?

6 A. No.

7 Q. Have you spoken with anyone at the
8 Palm Beach Police Department in the last five years?

9 MR. RHEINHART: When you say, "the Palm
10 Beach Police," for any purpose or as related to
11 this case? Again, for example, if there was
12 like a parking ticket --

13 MR. KUVIN: Sure.

14 MR. RHEINHART: -- or some other thing, I
15 want to clarify that.

16 BY MR. KUVIN:

17 Q. Let's, let's start with broad, and we can
18 work to specific. Can you recall having any
19 conversations for any reason with the Palm Beach
20 Police Department in the last five years?

21 A. No.

22 Q. Okay. Do you have knowledge whether or
23 not the Palm Beach Police Department ever requested
24 for you to come in for an interview at any time in
25 the last five years?

Page 96

1 MR. RHEINHART: If you know the answer to
2 that question because that's something your
3 attorney told you, you don't have to answer
4 that question. Otherwise, go ahead and answer.

5 THE WITNESS: No.

6 BY MR. KUVIN:

7 Q. Okay. When did you first retain an
8 attorney? What date did you first retain a -- I
9 mean, let me clarify. What date did you first
10 retain a criminal attorney?

11 MR. RHEINHART: I'll instruct her not to
12 answer based on the Fifth Amendment 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. Did you first retain a criminal attorney
18 in the year 2005?

19 MR. RHEINHART: Same instruction.

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

23 BY MR. KUVIN:

24 Q. Did you retain a criminal attorney in
25 2004?

24 (Pages 93 to 96)