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MR. RHEINHART: Same instruction of my lawyer, I must invoke my Fifth Amendment privilege. BY MR. KUVIN: MR. REIENHART: May I consult? MR. RHEINHART: May I consult? MR. RHEINHART: You can answer the question. THE WITNESS: Ves. When? A. I don't remember. I don't remember the dates. It is as a teast maybe ten years ago. Q. And you're how old now? MR. RHEINHART: I'll instruct the witness not to answer the question. Nice try. Instruct you not to answer based on you're fith Amendment privilege. MR. RUVIN: I'm just trying to find out. Tage 96 MR. RUNN: I'm just trying to find out. Tage 96 MR. RHEINHART: Like I said, good try. Move on. BY MR. KUVIN: MR. RHEINHART: Like I said, good try. Move on. BY MR. KUVIN: MR. RHEINHART: Like I said, good try. Move on. BY MR. KUVIN: MR. RHEINHART: It is truct the witness not to answer based on privilege. MR. RHEINHART: It is runted the witness not to answer based on privilege. MR. RHEINHART: Like I said, good try. Move on. BY MR. KUVIN: MR. RHEINHART: It is runted the witness not to answer based on privilege. MR. RHEINHART: It is runted the witness not to answer based on fifth Amendment privilege. MR. RHEINHART: It is runted the witness not to answer based on fifth Amendment privilege. MR. RHEINHART: It is runted the witness not to answer based on fifth Amendment privilege. MR. RHEINHART: It is runted the witness not to answer based on fifth Amendment privilege. MR. RHEINHART: It is runted the witness not to answer based on fifth Amendment privilege. MR. RHEINHART: It is runted the witness not to answer based on fifth Amendment privilege. MR. RHEINHART: Sim objection, instruct the witness not to answer based on fifth Amendment privilege. MR. RHEINHART: Sim objection, instruct the witness on to answer based on fifth Amendment privilege. MR. RHEINHART: I'll instruct the witness not to answer based on fifth Amendment privilege. MR. RHEINHART: I'll instruct the witness not to answer based on fifth Amendment privilege. MR. RHEINHART: Simple trying to f		Page 97		Page 99
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6 MR RHEINHART: And to clarify the objection is that it assumes that she's ever met or knows anything about Jean-Luc Brunel. 8 MR RHEINHART: You can answer the question. 9 MR RHEINHART: You can answer the question. 11 THE WITNESS: Yes. 12 THE WITNESS: Yes. 13 BY MR KUVIN: 14 Q. When? 15 A. I don't remember. I don't remember the dates. It was at least maybe ten years ago. 16 Q. And you're how old now? 17 Q. And you're how old now? 18 MR RHEINHART: Il instruct the witness not to answer the question. Nice try. 19 Instruct you not to answer based on your Fifth Amendment privilege. 10 Instruct you not to answer based on your Fifth Amendment privilege. 11 MR. RHEINHART: Like I said, good try. 12 Move on. 13 BY MR. KUVIN: 14 Q. Ware you were promised anything regarding your modeling career by Jerith Amendment privilege. 15 MR. RHEINHART: Instruct the witness not to answer. 16 MR. RHEINHART: Instruction of my lawyer, I inwoke my Fifth Amendment privilege. 17 BY MR. KUVIN: 18 MR. RHEINHART: Instruct the witness not to answer based on privilege. 19 MR. RHEINHART: Instruct the witness not to answer based on privilege. 10 MR. RHEINHART: Instruction of my lawyer, I inwoke my Fifth Amendment privilege. 11 BY MR. KUVIN: 12 Q. Ware you ever promised anything regarding your modeling career by Jeen-Luc Brunel. 12 MR. RHEINHART: Instruct the witness not to answer. 14 MR. RHEINHART: Instruct the witness not to answer. 15 MR. RHEINHART: Instruct the witness not to answer. 16 MR. RHEINHART: Instruct the witness not to answer. 17 MR. RHEINHART: Instruct the witness not to answer based on privilege. 18 MR. RHEINHART: Instruct the witness not to answer based on privilege. 19 MR. RHEINHART: Instruct the witness not to answer based on privilege. 20 MR. RHEINHART: Instruct the witness not to answer based on privilege. 21 MR. RHEINHART: Instruct the witness not to answer based on privilege. 22 MR. RUVIN: All me to show it to the camera first. 23 MR. RHEINHART: Instruct the witness not to answer based on privilege. 24 MR. RHEINHART: Instruc				- · ·
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16 It was at least maybe ten years ago. Q. And you're how old now? 18 MR. RHEINHART: I'll instruct the witness not to answer the question. Nice try. 19 Instruct you not to answer based on your Fifth Amendment privilege. 21 your Fifth Amendment privilege. 22 THE WITNESS: On the instruction of my lawyer, I'm going to invoke my Fifth Amendment privilege. 25 MR. KUVIN: I'm just trying to find out. 26 Page 98 27 MR. RHEINHART: Objection. It assumes she has any knowledge of either Mr. Epstein or Mr. Brunel, and as to that she is going to invoke her Fifth Amendment privilege. The question is compound and therefore ambiguous. 28 MR. KUVIN: I'm just trying to find out. 29 MR. KUVIN: 40 MR. RHEINHART: Like I said, good try. 41 Move on. 42 Move on. 43 BY MR. KUVIN: 44 Q. With respect to your work as a professional model, what company did you work for? 45 MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment privilege. 41 BY MR. KUVIN: 42 Q. What is your understanding of 12 Mr. Epstein's involvement with the modeling industry? 43 Instruct the witness not to answer based on Pifth Amendment oprivilege. 44 MR. RHEINHART: Standing objection, and instruct the witness not to answer based on Pifth Amendment oprivilege. 45 MR. RHEINHART: Standing objection, and instruct the witness not to answer based on the Fifth Amendment oprivilege. 46 MR. RHEINHART: Standing objection, and instruct the witness not to answer based on the Fifth Amendment oprivilege. 47 MR. RHEINHART: Standing objection, and instruct the witness not to answer based on the fifth Amendment oprivilege. 48 MR. RHEINHART: Objection to the form. It assumes she knows anything at all about Ghislaine Maxwell and asks her to assume that she does, and therefore it is compound and ambiguous, and I would instruct her not to answer based on the Fifth Amendment of my lawyer, I must invoke my Fifth Amendment privilege. 49 MR. KUVIN: Mr. Would instruct her not to answer based on the fifth Amendment of my lawyer, I must invoke my Fifth Amendment privilege.	l .	7		1
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THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment 21 MR. KUVIN: All right. (Plaintiff's Exhibit No. 12 was marked to the control of the contr	
21 lawyer, I must invoke my Fifth Amendment 21 (Plaintiff's Exhibit No. 12 was marked to	
,	
	T
22 privilege. 22 identification.)	
23 MR. KUVIN: Okay. I will mark this as 23 BY MR. KUVIN:	
24 Exhibit 11. 24 Q. Do you recognize the gentleman that is	
25 shown	
Page 102 Page	
1 (Plaintiff's Exhibit No. 11 was marked for 1 MR. RHEINHART: We'll have a job	ere.
2 identification.) 2 MR. KUVIN: That is true.	
3 BY MR. KUVIN: 3 BY MR. KUVIN:	
Q. Let me show you what we marked as Q. — that is shown in Exhibit 12?	
5 Exhibit 11. Hang on one second. 5 MR. KUVIN: Let me hold this for the	l
6 MR. RHEINHART: Sure. 6 camera first.	
7 BY MR. KUVIN: 7 MR. RHEINHART: I'm sorry. Is the	a
8 Q. Do you recognize the young lady shown in 8 question pending?	
9 Exhibit 11? 9 MR. KUVIN: Yes.	
10 MR. RHEINHART: I'll instruct the witness 10 BY MR. KUVIN:	I
not to answer based on her Fifth Amendment 11 Q. Do you recognize the gentleman show	n in
12 privilege. 12 Exhibit 12?	
13 THE WITNESS: On the instruction of my 13 MR. RHEINHART: I instruct her not	0
lawyer, I must invoke my Fifth Amendment 14 answer based on the Fifth Amendment.	
15 privilege. 15 THE WITNESS: On the instruction of	my
16 BY MR. KUVIN: 16 lawyer, I must invoke my Fifth Amendme	
Q. Do you agree with me that the young girl 17 privilege.	
shown in Exhibit 11 was recruited by Ghislaine 18 BY MR. KUVIN:	
19 Maxwell to, for sexual activity with 19 Q. Would you agree with me that that is	
20 Jeffrey Epstein? 20 Prince Andrew shown in Exhibit 12?	
MR. RHEINHART: Objection to the form. It 21 MR. RHEINHART: Same instruction	Ī
22 assumes she knows who the person is in Exhibit 22 THE WITNESS: On the instruction of	mv l
23 11, and assumes she knows who Ghislaine Maxwell 23 lawyer, I must invoke my Fifth Amendme	- 1
24 is, and assumes she knows who Jeffrey Epstein 24 privilege.	
	ł

	Daga 105		Dana 107
	Page 105		Page 107
1	BY MR. KUVIN:	1	break now.
2	Q. Would you agree with me that you have been	2	MR. KUVIN: Okay.
3	present where Jeffrey Epstein and Prince Andrew have	3	THE VIDEOGRAPHER: We're now off video
4	had sexual relations with underage girls?	4	record. The time is 11:57 a.m.
5	MR. RHEINHART: Objection to the form,	5	(A luncheon recess was held.)
6	it's compound in that it assumes she knows who	6	(Plaintiff's Exhibit No's 4 was marked for
7	the person is in Picture 12, she knows who	7	identification.)
8	Prince Andrew is, and she knows who Jeffrey	8	(Plaintiff's Exhibit No. 5 was marked for
9	Epstein is. It's compound and ambiguous, and	9	identification.)
10	I'll instruct her not to answer based on her	10	THE VIDEOGRAPHER: We're now on video
11	Fifth Amendment.	11	record. The time is 1:02 p.m.
12	THE WITNESS: On the instruction of my	12	MR. KUVIN: All right, counsel. I'm going
13	lawyer, I must invoke my Fifth Amendment	13	to ask a couple more general questions, and
14	privilege.	14	then when we get into the specifics of the
15	BY MR. KUVIN:	15	individual girls, I just want to make sure,
16	Q. Would you agree with me that Prince Andrew	16	once again, on the record, as we've done in
17	and Jeffrey Epstein used to share underaged girls	17	every deposition in this case, that we'll use
18	for sexual relations?	18	the Plaintiff's full name with the
19	MR. RHEINHART: Same objection previously	19	understanding that the final transcript will
20	stated, requires her to also speculate who	20	only contain their initials, and there will be
21	Prince Andrew is. I instruct her not to answer	21	a key at the conclusion that's only provided to
22	based on the Fifth Amendment.	22	the parties in this case and their counsel to
23	THE WITNESS: On the instruction of my	23	be kept confidential going forward. But
24	lawyer, I must invoke my Fifth Amendment	24	obviously, for the purposes of this deposition,
25	privilege.	25	we will be using full names.
	Page 106		Page 108
4		a	_
1	MR. RHEINHART: Also requires speculation	1	MR. RHEINHART: Agreed.
2	as to who Jeffrey Epstein is as well.	2	MR. KUVIN: Okay. Is there any
3	BY MR. KUVIN:	3	disagreement with that around the table?
4	Q. Do you know who Prince Andrew is?	4	MR. HOROWITZ: Agreed.
5	MR. RHEINHART: I'll instruct her not to	5	MR. WEISSING: Agreed.
6	answer based on the Fifth Amendment.	6	MS. EZELL: Agreed.
7	THE WITNESS: On the instruction of my	7	MR. KUVIN: Jack, do you agree to the
8	lawyer, I must invoke my Fifth Amendment	8	MR. GOLDBERGER: I thought I'm not a part
9	privilege.	9	of it.
10	MR. KUVIN: It's almost 12:00. Do you	10	MR. KUVIN: Well, you've been playing a
11	want to take a quick lunch?	11	part, so I want to make sure you agree.
12	MR. RHEINHART: Sure. How much longer do	12	MR. GOLDBERGER: Yeah, I agree. I agree.
13	you think you will be, Mr. Kuvin, before we go	13	MR. RHEINHART: Hold on. Let me just
14	on to other counsel?	14	explain to her what we're talking about.
15	MR. KUVIN: Probably not that much longer.	15	MR. KUVIN: Please do.
16	MR. RHEINHART: Okay.	16	MR. RHEINHART: But when the transcript is
17	MR. KUVIN: I have to get through a couple	17	typed up, it won't have her name it will just
18	of more generic stuff, and then get into the	18	have initials. But we'll get a code that
19	specifics of my cases and then	19	explains the name. So that way you would be
20	MR. RHEINHART: Okay. So, we, but just so	20	asked if you recognize the name not a set of
21	we have a sense of planning whether this is the	21	initials that you may not understand or a Jane
22	right time for a lunch break. You're not going	22	Doe number that you do not know.
23	to finish in the next 15 or 20 minutes?	23	MR. KUVIN: That's way too confusing.
24	MR. KUVIN: No, not even close.	24	Okay?
25	MR. RHEINHART: Okay. Let's take a lunch	25	MR. RHEINHART: Correct.

1	Page 109		Page 111
	BY MR. KUVIN:	1	objection to the form.
2	Q. Let's take a look at what I've marked	2	THE WITNESS: At the instruction of my
3	premarked as Exhibit 4. It's a stack of documents,	3	lawyer, I must invoke my Fifth Amendment
4	just so you understand what this is and your	4	privilege.
5	attorney can object or agree or disagree as he sees	5	BY MR. KUVIN:
6	fit, but this is a stack of documents that was part	6	Q. Yes. Do you know Alex Hall?
7	of the trash pull from Jeffrey Epstein's home as	7	MR. RHEINHART: Instruct the witness not
8	part of the criminal investigation. Just so you're	8	to answer the question based on her Fifth
9	aware of what these are.	9	Amendment privilege.
10	MR. RHEINHART: That was retrieved, that	10	THE WITNESS: On the instruction of my
11	was retrieved by the Palm Beach Police	11	lawyer, I must exercise my Fifth Amendment
12	Department from the trash	12	- The state of the
13	MR. KUVIN: That's correct.	13	privilege. BY MR. KUVIN:
14	MR. RHEINHART: — at the home of what is	14	
15	· · · · · · · · · · · · · · · · · · ·		Q. Will you agree with me that on the first
	known to be Mr. Epstein's home?	15	page of Exhibit 4, you were to arrange for roses to
16	MR. KUVIN: Correct.	16	be delivered to Jane Doe No. 103 at her high school
17	MR. RHEINHART: Okay.	17	performance?
18	MR. KUVIN: All right. And that's not a	18	MR. RHEINHART: Objection to the form.
19	question. I just wanted to kind of give you a	19	It's compound in that it assumes this is the
20	context for what I'm going to be asking you	20	witness's handwriting and assumes the witness
21	about.	21	knows a person by the name of Jane Doe No. 103
22	MR. RHEINHART: Thank you.	22	and the witness otherwise knows Jeffrey Epstein
23	BY MR. KUVIN:	23	whose name is at the bottom of the paper, and
24	Q. All right. In taking a look at Exhibit 4,	24	therefore, it's compound and ambiguous, and
25	I'd like you to take a look at the front page, the	25	instruct her not to answer.
	Page 110		Page 112
1	first page of those documents.	1	THE WITNESS: On the instruction of my
2	In that your hands witing malam?		
	Is that your handwriting, ma'am?	2	lawyer, I must exercise my Fifth Amendment
3	MR. RHEINHART: Instruct the witness not	2 3	
3 4			lawyer, I must exercise my Fifth Amendment
	MR. RHEINHART: Instruct the witness not	3	lawyer, I must exercise my Fifth Amendment right.
4	MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment	3 4	lawyer, I must exercise my Fifth Amendment right. MR. KUVIN: I forgot to mention this at
4 5	MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment privilege.	3 4 5	lawyer, I must exercise my Fifth Amendment right. MR. KUVIN: I forgot to mention this at the beginning, but objection to form usually
4 5 6	MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment privilege. THE WITNESS: At the instruction of my	3 4 5 6	lawyer, I must exercise my Fifth Amendment right. MR. KUVIN: I forgot to mention this at the beginning, but objection to form usually covers all that stuff like vague and compound,
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4 5 6 7 8	MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment privilege. THE WITNESS: At the instruction of my lawyer, I must exercise my Fifth Amendment right.	3 4 5 6 7 8	lawyer, I must exercise my Fifth Amendment right. MR. KUVIN: I forgot to mention this at the beginning, but objection to form usually covers all that stuff like vague and compound, and MR. RHEINHART: Okay. MR. KUVIN: I'll leave it up to you,
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	Page 113		Page 115
1	right.	1	MR. RHEINHART: Okay. I would be happy
2	BY MR. KUVIN:	2	to.
3	Q. Do you know who Larry is, as referred to	3	MR. KUVIN: I just want to clarify,
4	in Page 2 of Exhibit 4?	4	because I don't think
5	MR. RHEINHART: I'm sorry. Can you	5	MR. RHEINHART: Okay.
6	BY MR. KUVIN:	6	MR. KUVIN: I don't think this is a
7	Q. Do you know who	7	problem, but I just want to clear it up.
8	MR. RHEINHART: restate the question?	8	MR. RHEINHART: Thank you, Mr. Kuvin.
9	BY MR. KUVIN:	9	I'll let her answer that question.
10	Q. Do you know who Larry is as referred to in	10	MR. KUVIN: Not a problem.
11	Page 2 of Exhibit 4?	11	
12	MR. RHEINHART: So, just so I'm clear,	12	MR. RHEINHART: So the question pending
13	what the question is, the document on its face	13	is, is that your handwriting? MR. KUVIN: Correct.
14	has the name Larry in it. You're just asking	14	BY MR. KUVIN: Correct.
15		15	
16	this witness whether she knows who this person	16	Q. Is this your handwriting? Just yes or no.A. No.
17	Larry is? MR. KUVIN: Correct.	17	i i i i i i i i i i i i i i i i i i i
18	MR. RHEINHART: Instruct the witness not		Q. Okay. Thank you. All right. Let's look
19		18	at Page 4 of Exhibit 4. All right. This one's a
	to answer based on her Fifth Amendment	19	little different. Is this your handwriting?
20	privilege.	20	MR. RHEINHART: Let me consult with her
21	THE WITNESS: On the instruction of my	21	again.
22	lawyer, I must invoke my Fifth Amendment right.	22	Okay. That's fine. You can answer
23	BY MR. KUVIN:	23	the question consistent with the
24	Q. Do you know why Larry was recommending	24	conversation we just had.
25	that Mr. Epstein leave?	25	THE WITNESS: No.
	Page 114		Page 116
1	Page 114 MR. RHEINHART: Objection to the form and	1	Page 116 BY MR. KUVIN:
1 2		1 2	
	MR. RHEINHART: Objection to the form and		BY MR. KUVIN:
2	MR. RHEINHART: Objection to the form and instruct the witness not to answer based upon	2	BY MR. KUVIN: Q. Do you know who Danielle is as referred to
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	Page 117		Page 119
1	MR. KUVIN: I'm sorry, go ahead.	1	that Page 5 of Exhibit 4 appears to be a receipt for
2	THE WITNESS: On the instruction of my	2	books ordered through Amazon.com?
3	lawyer, I must invoke my Fifth Amendment	3	MR. RHEINHART: You can answer that yes or
4	privilege.	4	no.
5	BY MR. KUVIN:	5	THE WITNESS: It looks like a receipt from
6	Q. All right. Take a look at Page 5, if you	6	Amazon.
7	would. Have you ever ordered anything, anything	7	BY MR. KUVIN:
8	yourself from Amazon.com?	8	Q. Okay. And did you place this order for
9	MR. RHEINHART: You're asking for herself	9	Jeffrey Epstein?
10	or anyone else if she has ever placed an order	10	MR. RHEINHART: Instruct the witness not
11	•	11	i i i i i i i i i i i i i i i i i i i
	with Amazon.com for any reason?	12	to answer the question in that the question
12	MR. KUVIN: I am asking whether she	l .	presumes that she knows who Jeffrey Epstein is,
13	personally has ever placed an order with a	13	and therefore, I instruct her not to answer.
14	company called Amazon.com.	14	THE WITNESS: On advice of counsel, I must
15	MR. RHEINHART: Yes or no. You can answer	15	invoke my Fifth Amendment privilege.
16	that.	16	BY MR. KUVIN:
17	THE WITNESS: Yes.	17	Q. Have you ever read the book identified in
18	BY MR. KUVIN:	18	Page 5 of Exhibit 4 called Slave Craft: Road Maps
19	Q. Okay. So you would agree with me that you	19	for Erotic Servitude - Principals, Skills and Tools?
20	know what Amazon.com is?	20	MR. RHEINHART: Instruct the witness not
21	A. Yes.	21	to answer based on her Fifth Amendment
22	Q. Okay. Now, have you ever placed an order	22	privilege.
23	through Amazon.com for things to be delivered at	23	THE WITNESS: On the instruction of my
24	358 El Brillo Way?	24	lawyer, I must choose to invoke my Fifth
25	MR. RHEINHART: Instruct the witness to	25	Amendment right.
	Page 118		Page 120
1	invoke her Fifth Amendment privilege as to that	1	BY MR. KUVIN:
2	question.	2	Q. Did you ever see that book I just
3	THE WITNESS: On the instruction of my	3	described at the home of Jeffrey Epstein on
4	lawyer, I must invoke my Fifth Amendment	4	358 El Brillo Way?
5	privilege.	5	MR. RHEINHART: Objection to the form in
6	BY MR. KUVIN:	6	that it presumes she knows Jeffrey Epstein and
7	Q. Will you agree with me	7	has ever been to 358 El Brillo Way. So, I
8	MR. RHEINHART: I'm sorry, Mr. Kuvin, for,	8	instruct her not to answer based on the Fifth
9	for the record, the page, pages of this exhibit	9	Amendment.
10		}	minimum.
	are not numbered but the nace we're looking at	10	THE WITNESS: On the instruction of my
	are not numbered, but the page we're looking at	10 11	THE WITNESS: On the instruction of my
11	purports to be a receipt for an order from	11	lawyer, I must choose to invoke my Fifth
11 12	purports to be a receipt for an order from Amazon.com; is that correct?	11 12	lawyer, I must choose to invoke my Fifth Amendment right.
11 12 13	purports to be a receipt for an order from Amazon.com; is that correct? MR. KUVIN: Correct. I just want her to	11 12 13	lawyer, I must choose to invoke my Fifth Amendment right. BY MR. KUVIN:
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Page 121 MR. RHEINHART: Same instruction. THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment right. BY MR. KUVIN: Q. This note, Page 9 of Exhibit 4, appears to state that Sarah is trying to move and then there's a blanked out name, for 11 then Brittany could work at 6. Do you know anyone with the name Brittany? RR. RHEINHART: If she knows anyone in the world by that name? A. No. Q. All right. Let's look at Page 7. Is that your handwriting? A. No. Q. Okay. Look at the next page which would be Page 8. Is that your handwriting? A. No. Q. Let's see how much quicker this goes. Let's look at Page 9. Is that your handwriting? A. No. Q. Let's see how much quicker this goes. Let's look at Page 9 again, if you would. MR. RHEINHART: When you say Page 9, 19 BY MR. KUVIN: Q. This note, Page 9 of Exhibit 4, appears to state that Sarah is trying to move and then there's a blanked out name, for 11 then Brittany could work at 6. Do you know anyone with the name Brittany? MR. RHEINHART: If she knows anyone in the world by that name? MR. RHEINHART: I'm saying, in the context, are you asking in the context of this note which you just read, or are you asking, generically, does she know anyone in the world by the name of Brittany? MR. KUVIN: Why don't we first do it in the context of this note. BY MR. KUVIN: MR. RHEINHART: When you say Page 9, Is this note referring to you when it
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BY MR. KUVIN: Q. Let's look at the sixth page of Exhibit 4, please. Is that your handwriting? A. No. Q. All right. Let's look at Page 7. Is that your handwriting? A. No. Q. Okay. Look at the next page which would be Page 8. Is that your handwriting? A. No. Q. Let's see how much quicker this goes. Let's look at Page 9 again, if you would. Seculd work at 6. Do you know anyone with the name Brittany? MR. RHEINHART: If she knows anyone in the world by that name? MR. KUVIN: Yeah. We could start with that. MR. RHEINHART: I'm saying, in the context, are you asking in the context of this note which you just read, or are you asking, generically, does she know anyone in the world by the name of Brittany? MR. KUVIN: Why don't we first do it in the context of this note. BY MR. KUVIN: BY MR. KUVIN: BY MR. KUVIN:
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please. Is that your handwriting? A. No. Q. All right. Let's look at Page 7. Is that your handwriting? A. No. MR. RHEINHART: If she knows anyone in the world by that name? MR. KUVIN: Yeah. We could start with that. MR. RHEINHART: I'm saying, in the context, are you asking in the context of this note which you just read, or are you asking, A. No. Q. Let's see how much quicker this goes. Let's look at Page 9. Is that your handwriting? A. No. Q. Look at Page 9 again, if you would. MR. RHEINHART: If she knows anyone in the world by that name? MR. KUVIN: Yeah. We could start with that. 10 MR. RHEINHART: I'm saying, in the context, are you asking in the context of this note which you just read, or are you asking, generically, does she know anyone in the world by the name of Brittany? MR. KUVIN: Why don't we first do it in the context of this note. BY MR. KUVIN: BY MR. KUVIN:
A. No. Q. All right. Let's look at Page 7. Is that your handwriting? A. No. Q. Okay. Look at the next page which would be Page 8. Is that your handwriting? A. No. Q. Let's see how much quicker this goes. Let's look at Page 9. Is that your handwriting? A. No. Q. Look at Page 9 again, if you would. 8 world by that name? MR. KUVIN: Yeah. We could start with that. 10 MR. RHEINHART: I'm saying, in the context, are you asking in the context of this note which you just read, or are you asking, generically, does she know anyone in the world by the name of Brittany? MR. KUVIN: Why don't we first do it in the context of this note. BY MR. KUVIN: BY MR. KUVIN:
9 Q. All right. Let's look at Page 7. Is that 10 your handwriting? 11 A. No. 12 Q. Okay. Look at the next page which would 13 be Page 8. Is that your handwriting? 14 A. No. 15 Q. Let's see how much quicker this goes. 16 Let's look at Page 9. Is that your handwriting? 17 A. No. 18 Q. Look at Page 9 again, if you would. 9 MR. KUVIN: Yeah. We could start with 10 that. 11 MR. RHEINHART: I'm saying, in the 12 context, are you asking in the context of this 13 note which you just read, or are you asking, 14 generically, does she know anyone in the world 15 by the name of Brittany? 16 MR. KUVIN: Why don't we first do it in 17 the context of this note. 18 BY MR. KUVIN:
your handwriting? A. No. Q. Okay. Look at the next page which would be Page 8. Is that your handwriting? A. No. Q. Let's see how much quicker this goes. Let's look at Page 9. Is that your handwriting? A. No. Q. Look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would. Let's look at Page 9 again, if you would.
A. No. Q. Okay. Look at the next page which would be Page 8. Is that your handwriting? A. No. Q. Let's see how much quicker this goes. Let's look at Page 9. Is that your handwriting? A. No. Q. Look at Page 9 again, if you would. MR. RHEINHART: I'm saying, in the context of this note which you just read, or are you asking, generically, does she know anyone in the world by the name of Brittany? MR. KUVIN: Why don't we first do it in the context of this note. MR. KUVIN: Why don't we first do it in the context of this note. MR. KUVIN: Why don't we first do it in the context of this note. BY MR. KUVIN:
Q. Okay. Look at the next page which would be Page 8. Is that your handwriting? 13 note which you just read, or are you asking, and an anote which you just read, or are you asking, generically, does she know anyone in the world by the name of Brittany? 16 Let's look at Page 9. Is that your handwriting? 16 MR. KUVIN: Why don't we first do it in the context of this note. 17 Look at Page 9 again, if you would. 18 BY MR. KUVIN:
be Page 8. Is that your handwriting? A. No. Q. Let's see how much quicker this goes. Let's look at Page 9. Is that your handwriting? A. No. Q. Look at Page 9 again, if you would. 13 note which you just read, or are you asking, generically, does she know anyone in the world by the name of Brittany? MR. KUVIN: Why don't we first do it in the context of this note. BY MR. KUVIN: BY MR. KUVIN:
14 A. No. 15 Q. Let's see how much quicker this goes. 16 Let's look at Page 9. Is that your handwriting? 17 A. No. 18 Q. Look at Page 9 again, if you would. 19 generically, does she know anyone in the world by the name of Brittany? 10 MR. KUVIN: Why don't we first do it in the context of this note. 11 BY MR. KUVIN: 12 BY MR. KUVIN:
15 Q. Let's see how much quicker this goes. 16 Let's look at Page 9. Is that your handwriting? 17 A. No. 18 Q. Look at Page 9 again, if you would. 19 by the name of Brittany? 10 MR. KUVIN: Why don't we first do it in the context of this note. 11 BY MR. KUVIN:
16 Let's look at Page 9. Is that your handwriting? 17 A. No. 18 Q. Look at Page 9 again, if you would. 19 MR. KUVIN: Why don't we first do it in the context of this note. 19 BY MR. KUVIN: 10 MR. KUVIN: Why don't we first do it in the context of this note. 11 BY MR. KUVIN:
17 A. No. 17 the context of this note. 18 Q. Look at Page 9 again, if you would. 18 BY MR. KUVIN:
18 Q. Look at Page 9 again, if you would. 18 BY MR. KUVIN:
4. Took at 1 agreed 1 days and
1 , , , , , , , , , , , , , , , , ,
1
ATTENDED TO THE PARTY OF THE PA
That the first content
Page 122 Page 12
1 BY MR. KUVIN: 1 BY MR. KUVIN:
2 Q. Do you know who Dr. Bard is? 2 Q. In the context of this note, do you know
3 MR. RHEINHART: Instruct the witness not 3 who Brittany is?
4 to answer based on the Fifth Amendment, because 4 MR. RHEINHART: Same instruction.
5 this sheet of paper has Jeffrey Epstein's name 5 THE WITNESS: On the advice of counsel, I
6 on the bottom, so the question implies that she 6 must invoke my Fifth Amendment right.
7 knows some connection between Dr. Bard and 7 BY MR. KUVIN:
8 Mr. Epstein. 8 Q. All-right. Let's look at Page 10.
9 MR. KUVIN: Hang on a minute. Based on 9 MR. RHEINHART: Mr. Kuvin, let me go bac
10 the objection, let me reword the question. 10 MR. KUVIN: Sure.
11 BY MR. KUVIN: 11 MR. RHEINHART: As to Page 1 of this
Q. Independent from this note and independent 12 exhibit, I think you had asked the witness
from anyone who may or may not be known as 13 whether this was her handwriting.
14 Jeffrey Epstein, do you know anyone by the name of 14 MR. KUVIN: Do you want to have her go
15 Dr. Bard? 15 back and answer?
16 A. I'm sorry. Ask the question again. 16 MR. RHEINHART: Yes, I would. Having
Q. Yes. I don't want you to assume anything 17 consulted with her further, I will have her go
from, the purpose of my question has anything to do 18 back to this question.
with someone who may be known as Jeffrey Epstein. 19 MR. KUVIN: Let's do that. I'll, I'll go
20 All I'm asking you is, generally, do 20 back and ask the question so that we can be
21 you know a person by the name of Dr. Bard? 21 clear.
22 MR. RHEINHART: Let me consult. 22 BY MR. KUVIN:
23 MR. KUVIN: Yes, yeah. 23 Q. On the Exhibit 4, the first page of
24 THE WITNESS: At the advice of counsel, I 24 Exhibit 4, ma'am, is that your handwriting? Yes or
25 must invoke my Fifth Amendment right. 25 no.

	Page 125		Page 127
1	A. No.	1	it in giving my advice, so thank you for
2	Q. Okay. All right. Let's skip Page 10,	2	clarifying.
3	because I think that's just a duplicate, and go to	3	MR. KUVIN: Absolutely.
4	Page 11, if you would.	4	BY MR. KUVIN:
5	MR. RHEINHART: Page 11 is	5	Q. All right. In Page 11 of Exhibit 4,
6	MR. KUVIN: It looks like DTG Operations,	6	there's a reference in the top right-hand corner, a
7	d/b/a Dollar Rent a Car.	7	message to a Mr. Goldsmith. Do you see that?
8	MR. RHEINHART: Got it. It's a printed	8	A. Uh-huh.
9	sheet, not a handwritten sheet.	9	Q. Yes?
10	MR. KUVIN: Correct.	10	MR. RHEINHART: You have to say yes or no
11	MR. RHEINHART: Okay. Thank you.	11	on the record.
12	BY MR. KUVIN:	12	THE WITNESS: Yes, I see it.
13	Q. All right. Do you know a gentleman by the	13	BY MR. KUVIN:
14	name of Janusz Banasiak, spelled J-a-n-u-s-z,	14	Q. Okay. All right. Do you know who
15	B-a-n-a-s-i-a-k?	15	Mr. Goldsmith is?
16	MR. RHEINHART: Instruct the witness not	16	MR. RHEINHART: I instruct the witness
17	to answer based on her Fifth Amendment	17	not to answer based on her privilege against
18	privilege.	18	self-incrimination.
19	THE WITNESS: On the instruction of, my	19	THE WITNESS: At the advice of counsel, I
20	lawyer, I must invoke my Fifth Amendment	20	must invoke my Fifth Amendment privilege.
21	privilege.	21	BY MR. KUVIN:
22	BY MR. KUVIN:	22	Q. Is this your handwriting on exhibit on
23	Q. Ma'am, isn't it true that you rented cars	23	the messages shown in Exhibit 4, Page 11?
24	through Dollar Rent a Car for underage girls, girls	24	MR. RHEINHART: Same instruction.
25	under the age of 18?	25	THE WITNESS: At the advice of counsel, I
***************************************	Page 126		Page 128
1	MR. RHEINHART: Instruct the witness not	1	must invoke my Fifth Amendment privilege.
2	to answer based on the Fifth Amendment	2	MR. RHEINHART: Hold on a second, Sarah.
3	privilege.	3	MR. KUVIN: Yeah, check.
4	THE WITNESS: On the instruction of my	4	MR. RHEINHART: Okay. Can you repeat the
5	lawyer, I must invoke the Fifth Amendment	5	question again? Maybe I misheard it,
6	privilege.	6	Mr. Kuvin.
7	BY MR. KUVIN:	7	MR. KUVIN: Yeah, not a problem. Let me
8	Q. Did you rent any cars from Dollar Rent a	8	lay a little foundation for it.
9	Car in West Palm Beach in the last five years?	9	MR. RHEINHART: That's okay. If you can
10	MR. RHEINHART: Same instruction.	10	just ask the question again. I think I just
11	THE WITNESS: On the instruction of my	11	misheard what you were asking.
12	lawyer, I must invoke my Fifth Amendment	12	BY MR. KUVIN:
13	privilege.	13	Q. Is this your handwriting shown on the
14	BY MR. KUVIN:	14	messages which is Page 11 of Exhibit 4?
15	Q. Let's take a look at Page 11.	15	A. No.
16	MR. RHEINHART: If we can just let me	16	Q. Okay. Is this handwriting that of
1	•	16 17	Q. Okay. Is this handwriting that of Ms. Sjoberg?
16	MR. RHEINHART: If we can just let me	1	•
16 17	MR. RHEINHART: If we can just let me go back, Mr. Kuvin, to clarify the prior two	17	Ms. Sjoberg?
16 17 18	MR. RHEINHART: If we can just let me go back, Mr. Kuvin, to clarify the prior two questions. When you say, "did you rent," did	17 18	Ms. Sjoberg? MR. KUVIN: Johanna I'm sorry, Sjoberg, Sjoberg? How do you pronounce it, Sjoberg? MS. CADWELL: Sjoberg?
16 17 18 19	MR. RHEINHART: If we can just let me go back, Mr. Kuvin, to clarify the prior two questions. When you say, "did you rent," did you mean did she personally pay for the rental,	17 18 19	Ms. Sjoberg? MR. KUVIN: Johanna I'm sorry, Sjoberg, Sjoberg? How do you pronounce it, Sjoberg?
16 17 18 19 20	MR. RHEINHART: If we can just let me go back, Mr. Kuvin, to clarify the prior two questions. When you say, "did you rent," did you mean did she personally pay for the rental, or was she, in any way, involved in arranging	17 18 19 20	Ms. Sjoberg? MR. KUVIN: Johanna I'm sorry, Sjoberg, Sjoberg? How do you pronounce it, Sjoberg? MS. CADWELL: Sjoberg?
16 17 18 19 20 21	MR. RHEINHART: If we can just let me go back, Mr. Kuvin, to clarify the prior two questions. When you say, "did you rent," did you mean did she personally pay for the rental, or was she, in any way, involved in arranging the rental?	17 18 19 20 21	Ms. Sjoberg? MR. KUVIN: Johanna I'm sorry, Sjoberg, Sjoberg? How do you pronounce it, Sjoberg? MS. CADWELL: Sjoberg? MR. KUVIN: I knew somebody would know. MR. RHEINHART: Did we get a pronunciation, I'm sorry?
16 17 18 19 20 21 22	MR. RHEINHART: If we can just let me go back, Mr. Kuvin, to clarify the prior two questions. When you say, "did you rent," did you mean did she personally pay for the rental, or was she, in any way, involved in arranging the rental? MR. KUVIN: The second part, in any way	17 18 19 20 21 22	Ms. Sjoberg? MR. KUVIN: Johanna I'm sorry, Sjoberg, Sjoberg? How do you pronounce it, Sjoberg? MS. CADWELL: Sjoberg? MR. KUVIN: I knew somebody would know. MR. RHEINHART: Did we get a

	Page 129		Page 131
1	BY MR. KUVIN:	1	appear to be directed well, let me, let me back
2	Q. Is this the handwriting of	2	up.
3	Johanna Sjoberg, if you know?	3	Page 11 of Exhibit 4 appears to be a
4	MR. RHEINHART: Hold on. Let me object to	4	message dated October 2nd, 2005, from Sarah. Do you
5	the form in that it presumes she knows what	5	see that top left-hand corner?
6	Ms. Sjoberg's handwriting is like or that she's	6	A. Yes.
7	ever known Ms. Sjoberg. So before you ask the	7	Q. Okay. At 10:40 a.m. My question is: Did
8	question, try to clarify that.	8	you call and leave a message at 10:40 a.m. on
9	MR. KUVIN: Well, that's what I'm trying	9	October 2, 2005, stating: Julia's sick and she
10	to find out.	10	can't come today?
11	BY MR. KUVIN:	11	MR. RHEINHART: Instruct the witness not
12	Q. Do you recognize this as the handwriting	12	to answer the question based on her Fifth
13	of Johanna Sjoberg? And it can be a yes or no.	13	Amendment privilege.
14	MR. RHEINHART: My, my objection to the	14	THE WITNESS: On the instruction of my
15	form is that you, you haven't asked her whether	15	lawyer I must exercise my Fifth Amendment
16	she actually knows who Johanna Sjoberg is, or	16	privilege.
17	whether she would recognize her handwriting if	17	BY MR. KUVIN:
18	she saw it.	18	Q. Upside down at the bottom of Page 11 is
19	MR. KUVIN: I would love to ask that	19	another phone message dated 10/1 of 2005. Appears
20	question if she'd answer it.	20	to be written to someone named Sarah. Do you see
21	MR. RHEINHART: Well, if she'll answer,	21	that?
22	that's a different question. But I think you	22	A. Yes.
23	need to ask it first otherwise this question is	23	Q. Okay. Do you
24	ambiguous.	24	MR. RHEINHART: Is it written, I'm sorry,
25	MR. KUVIN: All right.	25	is it written to someone named Sarah or it
and the second s	Page 130	***************************************	Page 132
1	BY MR. KUVIN:	1	appears to be a phone call from a person named
2	Q. Not, not to beat a dead horse on the	2	Sarah?
3	point, do you know Johanna Sjoberg?	3	MR. KUVIN: From a person named Sarah.
4	MR. RHEINHART: I instruct the witness not	4	Thank you.
5	to answer.	5	BY MR. KUVIN:
6	THE WITNESS: On advice of counsel, I must	6	Q. Did you call someone, anyone on October 1
7	invoke my Fifth Amendment privilege.	7	of 2005 at 9:50 a.m., to confirm two people, one at
8	BY MR. KUVIN:	8	11:00 and one at 4:00 p.m.?
9	Q. Have you seen Johanna Sjoberg's	9	MR. RHEINHART: Instruct the witness not
10	handwriting in the past?	10	to answer based on her Fifth Amendment
11	MR. RHEINHART: Objection to the form as	11	privilege against self-incrimination since this
12	previously stated. I'll instruct the witness	12	document was seized from Mr. Epstein's home.
13	not to answer.	13	THE WITNESS: At the instruction of my
14	THE WITNESS: On advice of counsel, I must	14	lawyer, I must invoke my Fifth Amendment
15	invoke my Fifth Amendment privilege.	15	privilege.
16	BY MR. KUVIN:	16	BY MR. KUVIN:
17	Q. Do you recognize Page 11 in Exhibit 4 as	17	Q. Are you the Sarah that's referred to in
18	the handwriting of Johanna Sjoberg?	18	these phone messages that we've been looking at?
19	MR. RHEINHART: Objection to the form for	19	MR. RHEINHART: Instruct the witness not
20	the reasons previously stated many, many times,	20	to answer.
	and I will instruct her not to answer.	21	THE WITNESS: On the instruction of my
21		22	tone of the transfer of the American
22	THE WITNESS: At the advice of counsel, I	22	lawyer, I must invoke my Fifth Amendment
22 23	must invoke my Fifth Amendment privilege.	23	privilege.
22			

1 2	Page 133		Page 135
	this same exhibit, if you would. Okay.	1	Fifth Amendment right.
E.u.	Is that your handwriting on Page 13	2	BY MR. KUVIN:
3	which happens to be a note stating "Johanna S. is	3	Q. Are you aware that Jeffrey Epstein would
4	coming"?	4	refer to "work" as performing naked massages for
5	MR. RHEINHART: Okay. Hold on. Can you	5	him?
6	just show me what page you're looking at?	6	MR. RHEINHART: Object to the form of the
7	Okay. We skipped a page.	7	question. It's compound and I instruct the
8	THE WITNESS: No.	8	witness not to answer.
9	BY MR. KUVIN:	9	THE WITNESS: On advice of counsel, I wish
10	Q. Okay. Do you recognize whose it is?	10	to invoke my Fifth Amendment right.
11	MR. RHEINHART: Let me talk to you again.	11	BY MR. KUVIN:
12	BY MR. KUVIN:	12	Q. Let's take a look at the next page, Page
13	Q. If it's a yes, you might want to talk to	13	16. All right. If we look at not the message, the
14	him; if it's a no, it might be quick.	14	phone message, but the note next to that it says:
15	A. No, no. Sorry.	15	Haley on Saturday with Sage at 10:30.
16	Q. Let's look at Page 14, same exhibit. The	16	Do you know who Haley is as referred
17	note on the right-hand side states, "The girl from	17	to in this note?
18	St. Bart's got sick so she won't be able to come.	18	A. On the advice of counsel, I must invoke my
19	Sarah got message from her." First of all, just	19	Fifth Amendment right.
20	generally, do you see the note I'm referring to?	20	Q. Do you know who Sage is as referred to in
21	A. Yes.	21	this note?
22	Q. Okay. Do you know what that is talking	22	A. On the advice of counsel, I must invoke my
23	about?	23	Fifth Amendment right.
24	A. No.	24	MR. GARCIA: I haven't heard the counsel
25	Q. Is that your handwriting?	25	give any advice.
***************************************	Page 134		Page 136
1	A. No.	1	MR. RHEINHART: You don't know what we've
2	Q. Did Mr. Epstein obtain girls under the age	2	talked about outside of the room so
3	of 16 from St. Bart's?	3	MR. GARCIA: Just changing the procedure
4	MR. RHEINHART: Instruct the witness not	4	is all?
5	to answer. Object to the form of the question	5	MR. RHEINHART: I'm changing the procedure
6	in that it presumes that she knows who	6	for Mr. Kuvin.
	Mr. Epstein is.	7	
7		•	MR. KUVIN: I'm all happy for speed.
7 8	THE WITNESS: On advice of counsel, I must	8	MR. KUVIN: I'm all happy for speed. BY MR. KUVIN:
	THE WITNESS: On advice of counsel, I must invoke my Fifth Amendment privilege.		
8		8	BY MR. KUVIN:
8 9	invoke my Fifth Amendment privilege.	8 9	BY MR. KUVIN: Q. All right. Let's look at Page 17 of
8 9 10	invoke my Fifth Amendment privilege. BY MR. KUVIN:	8 9 10	BY MR. KUVIN: Q. All right. Let's look at Page 17 of Exhibit 4. It appears to be a phone message at the
8 9 10 11	invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. All right. Let's take a look at the next	8 9 10 11	BY MR. KUVIN: Q. All right. Let's look at Page 17 of Exhibit 4. It appears to be a phone message at the bottom dated 9/1/05 to Jeffrey from Jean-Luc. Let
8 9 10 11 12	invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. All right. Let's take a look at the next page. Appears to be a note, phone message of I	8 9 10 11 12	BY MR. KUVIN: Q. All right. Let's look at Page 17 of Exhibit 4. It appears to be a phone message at the bottom dated 9/1/05 to Jeffrey from Jean-Luc. Let me ask this: Do you recognize the phone number
8 9 10 11 12 13	invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. All right. Let's take a look at the next page. Appears to be a note, phone message of I can't read the date, 2005 to Jeffrey from	8 9 10 11 12 13	BY MR. KUVIN: Q. All right. Let's look at Page 17 of Exhibit 4. It appears to be a phone message at the bottom dated 9/1/05 to Jeffrey from Jean-Luc. Let me ask this: Do you recognize the phone number that's listed there of (646)286-7000?
8 9 10 11 12 13 14	invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. All right. Let's take a look at the next page. Appears to be a note, phone message of — I can't read the date, 2005 to Jeffrey from Melissa Hanes. Just generally, do you see what I'm talking about so we're on the same page here? A. Yes.	8 9 10 11 12 13 14 15	BY MR. KUVIN: Q. All right. Let's look at Page 17 of Exhibit 4. It appears to be a phone message at the bottom dated 9/1/05 to Jeffrey from Jean-Luc. Let me ask this: Do you recognize the phone number that's listed there of (646)286-7000? MR. RHEINHART: Instruct the witness not to answer based on her Fifth Amendment privilege and self-incrimination.
8 9 10 11 12 13 14 15	invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. All right. Let's take a look at the next page. Appears to be a note, phone message of I can't read the date, 2005 to Jeffrey from Melissa Hanes. Just generally, do you see what I'm talking about so we're on the same page here?	8 9 10 11 12 13 14 15 16 17	BY MR. KUVIN: Q. All right. Let's look at Page 17 of Exhibit 4. It appears to be a phone message at the bottom dated 9/1/05 to Jeffrey from Jean-Luc. Let me ask this: Do you recognize the phone number that's listed there of (646)286-7000? MR. RHEINHART: Instruct the witness not to answer based on her Fifth Amendment privilege and self-incrimination. THE WITNESS: On advice of counsel, I must
8 9 10 11 12 13 14 15 16 17	invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. All right. Let's take a look at the next page. Appears to be a note, phone message of I can't read the date, 2005 to Jeffrey from Melissa Hanes. Just generally, do you see what I'm talking about so we're on the same page here? A. Yes. Q. Okay. Do you know who Melissa Hanes is? A. On the advice of counsel, I wish to invoke my	8 9 10 11 12 13 14 15 16 17 18	BY MR. KUVIN: Q. All right. Let's look at Page 17 of Exhibit 4. It appears to be a phone message at the bottom dated 9/1/05 to Jeffrey from Jean-Luc. Let me ask this: Do you recognize the phone number that's listed there of (646)286-7000? MR. RHEINHART: Instruct the witness not to answer based on her Fifth Amendment privilege and self-incrimination. THE WITNESS: On advice of counsel, I must invoke my Fifth Amendment right.
8 9 10 11 12 13 14 15 16 17 18 19	invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. All right. Let's take a look at the next page. Appears to be a note, phone message of I can't read the date, 2005 to Jeffrey from Melissa Hanes. Just generally, do you see what I'm talking about so we're on the same page here? A. Yes. Q. Okay. Do you know who Melissa Hanes is? A. On the advice of counsel, I wish to invoke my Fifth Amendment right.	8 9 10 11 12 13 14 15 16 17 18	BY MR. KUVIN: Q. All right. Let's look at Page 17 of Exhibit 4. It appears to be a phone message at the bottom dated 9/1/05 to Jeffrey from Jean-Luc. Let me ask this: Do you recognize the phone number that's listed there of (646)286-7000? MR. RHEINHART: Instruct the witness not to answer based on her Fifth Amendment privilege and self-incrimination. THE WITNESS: On advice of counsel, I must invoke my Fifth Amendment right. MR. KUVIN: Let me show this one to the
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1 2	Page 137		Page 139
2	bring the whole paper up closer.	1	Do you first of all, do you see
1 4	MR. KUVIN: Towards you?	2	that in front of you? Are we talking about the same
3	THE VIDEOGRAPHER: Yes, towards the lens.	3	thing here?
4	MR. KUVIN: Just pass that up so we can	4	A. Yes.
5	get a good shot of the bottom message.	5	Q. Okay. Do you know who "Haley" is
6	THE VIDEOGRAPHER: Up a little higher,	6	referring to in this note?
7	please. Let it focus. That's good. Go out.	7	MR. RHEINHART: Instruct the witness not
8	Okay.	8	to answer based on her Fifth Amendment
9	MR. KUVIN: All right. Thank you very	9	privilege.
10	much.	10	THE WITNESS: On the instruction of my
11	BY MR. KUVIN:	11	lawyer, I must invoke my Fifth Amendment
12	Q. The message appears to read: 9/1/2005 to	12	privilege.
13	Jeffrey, 8:08, Jean-Luc, telephone. He has a	13	BY MR. KUVIN:
14	teacher for you to teach you how to speak Russian.	14	Q. Does your handwriting appear anywhere on
15	She is two times eight years old, not blonde.	15	Page 19 here
16	Lessons are free and you can have first today if you	16	A. On the
17	call. Do you know what that message is referring	17	Q on either note?
18	to?	18	A. On the advice of my lawyer, I must invoke my
19	MR. RHEINHART: Instruct the witness not	19	Fifth Amendment privilege.
20	to answer the question. Object to the form of	20	Q. Is that your handwriting on the left in
21	the question because in that it presumes she	21	the note that I just read that says: Haley,
22	has knowledge of either Jeffrey or Jean-Luc or	22	11:00 a.m.?
23	that phone number.	23	
24	THE WITNESS: On the advice of counsel, I	24	MR. RHEINHART: Same instruction.
25	wish to invoke my Fifth Amendment right.	25	THE WITNESS: On the instruction of my
2.0		<i>~</i> J	lawyer, I must invoke my Fifth Amendment
	Page 138		Page 140
1	BY MR. KUVIN:	1	privilege.
2	Q. Would you agree with me that this message	2	privilege. BY MR. KUVIN:
2 3	Q. Would you agree with me that this message is a message from Jean-Luc, that he's providing a	2 3	privilege. BY MR. KUVIN: Q. All right. Let's take a look at the next
2 3 4	Q. Would you agree with me that this message is a message from Jean-Luc, that he's providing a 16-year-old girl to Jeffrey Epstein?	2 3 4	privilege. BY MR. KUVIN: Q. All right. Let's take a look at the next page which is Page 20. Is that your handwriting on
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	Page 141		Page 143
1	lawyer, I must invoke my Fifth Amendment	1	MR. RHEINHART: Same instruction.
2	privilege.	2	THE WITNESS: On the advice of my lawyer,
3	BY MR. KUVIN:	3	I must choose to invoke my Fifth Amendment
4	Q. Did Jeffrey Epstein not like girls that	4	right.
5	had blonde hair?	5	BY MR. KUVIN:
6	MR. RHEINHART: Standing objection and the	6	Q. Do you know who E.W. is?
7	same instruction.	7	MR. RHEINHART: Same instruction.
8	THE WITNESS: On the instruction of my	8	THE WITNESS: On the advice of my lawyer,
9	lawyer, I must invoke my Fifth Amendment	9	I wish to invoke my Fifth Amendment privilege.
10	privilege.	10	BY MR. KUVIN:
11	BY MR. KUVIN:	11	Q. Do you know who L.M. is?
12	Q. Take a look at the next page, if you	12	MR. RHEINHART: Let me consult for a
13	would. This one.	13	second.
14	MR. RHEINHART: Thank you.	14	MR. KUVIN: Yep.
15	BY MR. KUVIN:	15	(A discussion was held off the record.)
16	Q. Is that your handwriting?	16	MR. RHEINHART: Mr. Kuvin, I'm just asking
17	A. On instruction of my lawyer, I must invoke my	17	you to clarify. Are you asking if she's ever
18	Fifth Amendment privilege.	18	heard the name of these people or whether she's
19	Q. Is this an additional on Page 21, is	19	actually ever met someone she knows to have
20	this an additional list of girls that were being	20	that name?
21	provided to Jeffrey Epstein for sex?	21	MR. KUVIN: Second part, whether she knows
22	MR. RHEINHART: I'm sorry. Did we change	22	someone personally by that name. I don't want
23	to a different page or the same page?	23	to know what somebody may have told her.
24	MR. KUVIN: The same page.	24	MR. RHEINHART: Sure.
25	with two vity. The same page.	25	MR. KUVIN: Certainly not attorneys or
40	D 140		
3	Page 142		Page 144
1	BY MR. KUVIN:	1	anything like that. I want to know whether she
2	Q. Is this an additional list of girls that	2	has any personal knowledge of someone by the
3	were	3	name of L.M.
4	MR. RHEINHART: Thank you.	4	MR. RHEINHART: Okay. Based on our
5	BY MR. KUVIN:	5	conversation, she can answer or not answer the
6	Q being provided to Jeffrey Epstein for	6	question.
7	sex?	7	THE WITNESS: On the advice of my lawyer,
8	MR. RHEINHART: Objection to the form.	8	I choose to invoke my Fifth Amendment right.
9	The same objection and the same instruction.	9	MR. KUVIN: Okay. It's like a
10	THE WITNESS: On the instruction of my	10	cough/sneeze.
11	lawyer, I must invoke my Fifth Amendment	11	MR. GARCIA: I tried to stifle it, but
	privilege.	12	MR. GOLDBERGER: You got it all over me.
12	^ ~		-
13	BY MR. KUVIN:	13	Just kidding.
13 14	BY MR. KUVIN: Q. Page 22. Note on the right appears to	14	Just kidding. MR. GARCIA: You don't want to get this.
13 14 15	BY MR. KUVIN: Q. Page 22. Note on the right appears to say: Johanna has a friend, Andrea, that would like	14 15	Just kidding. MR. GARCIA: You don't want to get this. I've had if for a couple of days.
13 14 15 16	BY MR. KUVIN: Q. Page 22. Note on the right appears to say: Johanna has a friend, Andrea, that would like to work tonight. Do you know who Johanna is refer,	14 15 16	Just kidding. MR. GARCIA: You don't want to get this. I've had if for a couple of days. MR. KUVIN: What number are we on? 13.
13 14 15 16 17	BY MR. KUVIN: Q. Page 22. Note on the right appears to say: Johanna has a friend, Andrea, that would like to work tonight. Do you know who Johanna is refer, referring to in that note?	14 15 16 17	Just kidding. MR. GARCIA: You don't want to get this. I've had if for a couple of days. MR. KUVIN: What number are we on? 13. That's why I always leave some with numbers
13 14 15 16 17 18	BY MR. KUVIN: Q. Page 22. Note on the right appears to say: Johanna has a friend, Andrea, that would like to work tonight. Do you know who Johanna is refer, referring to in that note? MR. RHEINHART: Instruct the witness not	14 15 16 17 18	Just kidding. MR. GARCIA: You don't want to get this. I've had if for a couple of days. MR. KUVIN: What number are we on? 13. That's why I always leave some with numbers still on there to show the picture to the
13 14 15 16 17 18	BY MR. KUVIN: Q. Page 22. Note on the right appears to say: Johanna has a friend, Andrea, that would like to work tonight. Do you know who Johanna is refer, referring to in that note? MR. RHEINHART: Instruct the witness not to answer based on the privilege against	14 15 16 17 18 19	Just kidding. MR. GARCIA: You don't want to get this. I've had if for a couple of days. MR. KUVIN: What number are we on? 13. That's why I always leave some with numbers still on there to show the picture to the camera.
13 14 15 16 17 18 19 20	BY MR. KUVIN: Q. Page 22. Note on the right appears to say: Johanna has a friend, Andrea, that would like to work tonight. Do you know who Johanna is refer, referring to in that note? MR. RHEINHART: Instruct the witness not to answer based on the privilege against self-incrimination.	14 15 16 17 18 19 20	Just kidding. MR. GARCIA: You don't want to get this. I've had if for a couple of days. MR. KUVIN: What number are we on? 13. That's why I always leave some with numbers still on there to show the picture to the camera. Exhibit 13 will be pursuant to
13 14 15 16 17 18 19 20 21	BY MR. KUVIN: Q. Page 22. Note on the right appears to say: Johanna has a friend, Andrea, that would like to work tonight. Do you know who Johanna is refer, referring to in that note? MR. RHEINHART: Instruct the witness not to answer based on the privilege against self-incrimination. THE WITNESS: On the advice of my lawyer,	14 15 16 17 18 19 20 21	Just kidding. MR. GARCIA: You don't want to get this. I've had if for a couple of days. MR. KUVIN: What number are we on? 13. That's why I always leave some with numbers still on there to show the picture to the camera. Exhibit 13 will be pursuant to confidentiality and the identities of the
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13 14 15 16 17 18 19 20 21 22	BY MR. KUVIN: Q. Page 22. Note on the right appears to say: Johanna has a friend, Andrea, that would like to work tonight. Do you know who Johanna is refer, referring to in that note? MR. RHEINHART: Instruct the witness not to answer based on the privilege against self-incrimination. THE WITNESS: On the advice of my lawyer, I wish to assert my Fifth Amendment right.	14 15 16 17 18 19 20 21 22	Just kidding. MR. GARCIA: You don't want to get this. I've had if for a couple of days. MR. KUVIN: What number are we on? 13. That's why I always leave some with numbers still on there to show the picture to the camera. Exhibit 13 will be pursuant to confidentiality and the identities of the girls involved in this case.

	Page 145		Page 147
1	different because it's an exhibit.	1	in Exhibit 13 came to Mr. Epstein's home when she
2	MR. RHEINHART: Agreed.	2	was only 15 years old?
3	MR. KUVIN: Okay.	3	MR. RHEINHART: Objection to the form
4	(Plaintiff's Exhibit No. 13 was marked for	4	based on the standing objection, also
5	identification.)	5	speculation as to any age and instruct the
6	MR. RHEINHART: We're moving off of	6	witness not to answer.
7	Exhibit 12?	7	THE WITNESS: On the advice of my lawyer,
8	MR. KUVIN: Yes.	8	I must choose to exercise my Fifth Amendment
9	MR. RHEINHART: I was looking at the next	9	right.
10	exhibit.	10	BY MR. KUVIN:
11	MR. KUVIN: We're done with the trash.	11	Q. Do you agree with me that when you
12		12	arranged to have this girl come to Mr. Epstein's
13	MR. RHEINHART: Okay.	13	
	BY MR. KUVIN:	14	home, that you were aware that she was 15 years old?
14	Q. Just take a look at Exhibit 13. Do you		MR. RHEINHART: Objection to the form. It
15	recognize the girl in that photograph?	15	is compound. It assumes facts that are not
16	A. On the advice of my lawyer, I must choose to	16	admitted by this witness, and it's ambiguous in
17	exercise my Fifth Amendment privilege.	17	that regard, and therefore I instruct her not
18	Q. Do you agree with me that that girl shown	18	to answer.
19	in that photograph is B.B.?	19	THE WITNESS: On the advice of my lawyer,
20	MR. RHEINHART: Objection to the form for	20	I must choose to exercise my Fifth Amendment
21	the reasons previously stated, causes her to	21	right.
22	speculate, and I instruct her not to answer	22	BY MR. KUVIN:
23	based on her Fifth Amendment privilege.	23	Q. Do you agree that when this girl was
24	THE WITNESS: On the advice of my lawyer,	24	brought to Mr. Epstein's home, that she performed a
25	I must choose to exercise my Fifth Amendment	25	massage on Mr. Epstein while he was naked?
	Page 146		Page 148
t transf		******	
	privilege.	2	MR. RHEINHART: Objection to the form,
2	privilege. BY MR. KUVIN:	1 2 3	MR. RHEINHART: Objection to the form, standing objection. The question assumes that
2 3	privilege. BY MR. KUVIN: Q. Do you agree with me that you arranged to	2 3	MR. RHEINHART: Objection to the form, standing objection. The question assumes that this witness has any knowledge of
2 3 4	privilege. BY MR. KUVIN: Q. Do you agree with me that you arranged to have the girl shown in Exhibit 13 be brought to	2 3 4	MR. RHEINHART: Objection to the form, standing objection. The question assumes that this witness has any knowledge of Jeffrey Epstein or whether this person ever
2 3 4 5	privilege. BY MR. KUVIN: Q. Do you agree with me that you arranged to have the girl shown in Exhibit 13 be brought to Mr. Epstein's home for sex with Mr. Epstein?	2 3 4 5	MR. RHEINHART: Objection to the form, standing objection. The question assumes that this witness has any knowledge of Jeffrey Epstein or whether this person ever came to Mr. Epstein's home. It is therefore
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1	Dem. 140		5 1.51
	Page 149		Page 151
1	the massage table in Jeffrey Epstein's bathroom?	1	counsel, I must choose to invoke my Fifth
2	MR. RHEINHART: Objection to the form for	2	Amendment right.
3	the reasons previously stated, and instruct the	3	BY MR. KUVIN:
4	witness not to answer.	4	Q. Do you agree with me that during the
5	THE WITNESS: On the advice of counsel, I	5	massage that B.B. was forced to give to Mr. Epstein,
6	must choose to exercise my Fifth Amendment	6	that he touched her between her legs?
7	right.	7	MR. RHEINHART: Objection to the form. It
8	BY MR. KUVIN:	8	is ambiguous including the term "forced." It
9	Q. Do you agree that you showed B.B. where	9	assumes facts that this witness has not
10	the massage oils are kept in Jeffrey Epstein's	10	admitted or that this witness has not
11	bathroom in his home?	11	acknowledged any personal knowledge and
12	MR. RHEINHART: Objection to the form in	12	instruct her not to answer.
13	that it assumes knowledge of Jeffrey Epstein,	13	THE WITNESS: On the instruction of my
14	knowledge that this person was ever at	14	lawyer, I must therefore invoke my Fifth
15	Jeffrey Epstein's home none of which is	15	Amendment right.
16	admitted or acknowledged by this witness, and	16	BY MR. KUVIN:
17	instruct the witness not to answer.	17	Q. Do you agree with me that Mr. Epstein
18	THE WITNESS: On advice of counsel I must	18	touched B.B. between her legs?
19	choose to invoke my Fifth Amendment right.	19	MR. RHEINHART: Objection to the form and
20	BY MR. KUVIN:	20	the question presumes knowledge of
21	Q. Do you agree that you showed B.B., as	21	Jeffrey Epstein. Instruct the witness not to
22	shown in Exhibit 13, where Mr. Epstein kept the	22	answer.
23	vibrators in his bathroom at his house?	23	THE WITNESS: On the instruction of my
24	MR. RHEINHART: Same objection as stated	24	lawyer, I must choose to invoke my Fifth
25	to the previous question as to the form of the	25	Amendment right.
j			
	` Page 150		Page 152
1		1	Page 152 BY MR. KUVIN:
1 2	question, and instruct the witness not to answer.	1 2	BY MR. KUVIN:
1	question, and instruct the witness not to	<u> </u>	
2	question, and instruct the witness not to answer. THE WITNESS: On advice of counsel, I must	2	BY MR. KUVIN: Q. Do you agree with me that B.B. told
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, , ,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. RHEINHART: Objection to the form, instruct the witness not to answer. THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment right. BY MR. KUVIN: Q. And just so we're clear, do you agree with me that you handed B.B. in 2005, \$200 after she was in the bathroom with Mr. Epstein at his home? MR. RHEINHART: Objection to the form. The question presumes knowledge of a person by the name of B.B., therefore I instruct the witness not to answer the question. THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment right. BY MR. KUVIN: Q. Do you agree with me that Mr. Epstein had a plan — let me rephrase that. Do you agree with me that Mr. Epstein had an enterprise, a sexual enterprise, established by which young girls would be brought to his home,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. RHEINHART: Objection to the form in that it presumes knowledge of B.B., that Ms. B.B. was ever at Mr. Epstein's home, that this witness knows anything about Mr. Epstein or his home; therefore, the question is compound and ambiguous, and I instruct her not to answer. THE WITNESS: On the instruction of my lawyer, I must choose to assert my Fifth Amendment right. BY MR. KUVIN: Q. Do you know C.L.? A. On the instruction of my lawyer, I must choose to assert my Fifth Amendment privilege. Q. Did you have C.L. — excuse me, strike that. Did you tell C.L. to come over to Mr. Epstein's home to give Mr. Epstein a massage? MR. RHEINHART: Objection to the form. It's compound. Stand objection, standing objection, sorry. Instruct the witness not to answer. THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth
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,	,	7	
1	MR. RHEINHART: Objection to the form,	1	BY MR. KUVIN:
2	standing objection. Instruct the witness not	2	Q. Would you agree with see that you visited
3	to answer.	3	a man by the name of Jeffrey Epstein while he was in
4	THE WITNESS: On the instruction from my	4	jail in Palm Beach County?
5	lawyer, I must choose to invoke my Fifth	5	MR. RHEINHART: Objection to the form,
6	Amendment right.	6	standing objection. Assumes other facts that
7	BY MR. KUVIN:	7	this witness has not acknowledged, and instruct
8	Q. Do you agree with me that Mr. Epstein	8	her not to answer.
9	threatened C.L. with physical violence?	. 9	THE WITNESS: Upon instruction from the
10	MR. RHEINHART: Objection to the form, the	10	lawyer, I must choose to invoke my Fifth
11	standing objection, as well as ambiguous as to	11	Amendment right.
12	the term "threaten." Instruct the witness not	12	BY MR. KUVIN:
13	to answer.	13	Q. Do you agree that you arranged to have
14	THE WITNESS: Upon instruction from my	14	C.L. come to Jeffrey Epstein's home for a nude
15	lawyer, I must choose to invoke my Fifth	15	massage?
16	Amendment right.	16	MR. RHEINHART: Objection to the form,
17	BY MR. KUVIN:	17	standing objection previously stated.
18	Q. Do you agree with me that Jeffrey Epstein	18	THE WITNESS: On the instruction of my
19	told C.L. that if she talks to anyone about what had	19	lawyer, I must choose to invoke my Fifth
20	occurred at his home, bad things would happen to	20	Amendment right.
21	her?	21	BY MR. KUVIN:
22	MR. RHEINHART: Objection to the form,	22	Q. Do you agree that C.L. has been to
23	it's compound, and a standing objection. Also	23	358 El Brillo Way on at least two occasions?
24	assumes numerous other facts that this witness	24	MR. RHEINHART: Objection to the form. It
25	has not acknowledge nor admitted, and therefore	25	assumes knowledge of C.L. and of 358 El Brillo
	Page 158		Page 160
1	I instruct her not to answer.	1	Way, to which the witness has not acknowledged,
2	THE WITNESS: On the instruction from my	2	and instruct the witness not to answer.
3	lawyer, I must choose to invoke my Fifth	3	THE WITNESS: On the instruction of my
4	Amendment privilege.	. 4	lawyer, I must choose to invoke my Fifth
5	BY MR. KUVIN:	5	Amendment right.
6	Q. Would you agree with me that in 2005 that	6	BY MR. KUVIN:
7	· • • • •	7	
8	Jeffrey Epstein was between the ages of 45 and 55	8	Q. Do you agree that Mr. Epstein has an
9	years old?	9	odd-shaped penis?
I .	MR. RHEINHART: Objection to the form.	10	MR. RHEINHART: Objection to the form of
10	Standing objection as to any knowledge of		the question. It assumes knowledge of
11	Jeffrey Epstein. Instruct the witness not to	11	Mr. Epstein. It assumes knowledge of
12	answer.	12	Mr. Epstein's body parts, and instruct the
13	THE WITNESS: The instruction of my	13	witness not to answer.
14	lawyer, I must choose to assert my Fifth	14	THE WITNESS: On advice on the
15	Amendment right.	15 16	instruction of my lawyer, I must choose to
16	BY MR. KUVIN:	16	invoke my Fifth Amendment right.
17	Q. Would you agree with me that	17	BY MR. KUVIN:
18	Jeffrey Epstein has tremendous wealth?	18	Q. Have you seen Jeffrey Epstein's penis?
19	MR. RHEINHART: Objection to the form as	19	MR. RHEINHART: Objection to the form, and
20	stated in the previous question, and instruct	20	we're getting awfully close to a line here, Mr.
21	the witness not to answer.	21	Kuvin.
22	THE WITNESS: On the instruction from the	22	MR. KUVIN: I think the identity of
23	lawyer, I must choose to invoke my Fifth	23	something that young 14 and 15-year-old girls
. () /	Amendment right.	24	have seen is directly relevant to the issues in
24 25	7 *************************************	25	this case. If they can describe it, then

I .	Page 161		Dage 162
_		_	Page 163
1	obviously it's important because they are the	1	MR. KUVIN: The Epstein matter.
2	only ones that are answering questions in this	2	MR. RHEINHART: I instruct the witness not
3	case.	3	to answer. Objection to the form as compound
4	MR. RHEINHART: Well, people have rights.	4	and assumes the existence of Mr. Epstein which,
5	People will assert their rights, and I am just	5	again, we are not acknowledging, and therefore
6	telling you, we're getting close to a line	6	am instructing her not to answer.
7	here.	7	THE WITNESS: On the instruction of my
8	MR. KUVIN: I think I'm being	8	lawyer, I choose to assert my Fifth Amendment
9	respectful	9	right.
10	MR. RHEINHART: You haven't crossed it yet	10	BY MR. KUVIN:
11	because I'm still here, but I'm just warning	11	Q. Are you aware that Mr. Epstein negotiated
12	you.	12	for your immunity from prosecution in the
13	Instruct the witness not to answer	13	non-prosecution agreement that was entered into with
14	any question that presumes existence or	14	the United States Attorney's Office for the Southern
15	any knowledge of Jeffrey Epstein or any of	15	District of Florida?
16	his body parts.	16	MR. RHEINHART: Again, objection to the
17	MR. KUVIN: Okay.	17	form for the reasons previously stated as to
18	THE WITNESS: On the instruction of my	18	the standing objection and instruct her not to
19	lawyer, I must choose to assert my Fifth	19	answer.
20	Amendment right.	20	THE WITNESS: On the instruction of my
21	BY MR. KUVIN:	21	lawyer, I must choose to invoke my Fifth
22	Q. Do you know whether or not Mr. Epstein has	22	Amendment right.
23	any identifying characteristics to any of his	23	BY MR. KUVIN:
24	private genitalia?	24	Q. Do you agree with me that B.B. was
25	MR. RHEINHART: Objection to the form for	25	emotionally traumatized as a result of the incidents
	Page 162		Page 164
1	the reason previously stated, because it	1	that occurred Jeffrey Epstein's home in 2005?
l	the reason previously stated, because it presumes that she has any knowledge of who		that occurred Jeffrey Epstein's home in 2005? MR. RHEINHART: Objection to the form. It
2	presumes that she has any knowledge of who	1 2 3	MR. RHEINHART: Objection to the form. It
l	presumes that she has any knowledge of who Jeffrey Epstein is or what his body parts look	2	MR. RHEINHART: Objection to the form. It assumes any knowledge of B.B. or any incidents
2 3	presumes that she has any knowledge of who Jeffrey Epstein is or what his body parts look like, and I would instruct her not to answer.	2 3 4	MR. RHEINHART: Objection to the form. It assumes any knowledge of B.B. or any incidents that would have occurred at a home purporting
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	presumes that she has any knowledge of who Jeffrey Epstein is or what his body parts look like, and I would instruct her not to answer. THE WITNESS: On the instruction of my lawyer, I must choose to assert my Fifth Amendment right. BY MR. KUVIN: Q. Have you heard anyone other than your lawyers that have described what any of Mr. Epstein's body parts look like? MR. RHEINHART: Objection to the form. It is irrelevant what she's heard from other people, and again, it presumes facts that she's not acknowledged. It is compound, and it is harassing at this point. THE WITNESS: On instruction of my lawyer, I must choose to invoke my Fifth Amendment right. BY MR. KUVIN: Q. Were you consulted with respect to the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. RHEINHART: Objection to the form. It assumes any knowledge of B.B. or any incidents that would have occurred at a home purporting to belong to a person by the name of Jeffrey Epstein, and instruct her not to answer. THE WITNESS: Upon instruction from my lawyer, I must choose to invoke my Fifth Amendment right. BY MR. KUVIN: Q. Do you agree with me that C.L. was emotionally traumatized as a result of the incidents that occurred at Jeffrey Epstein's home? MR. RHEINHART: Same objection as to the previous question, and instruct the witness not to answer. THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. Do you know Jane Doe No. 102? MR. RHEINHART: Instruct the witness not to answer based on Fifth Amendment privilege.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	presumes that she has any knowledge of who Jeffrey Epstein is or what his body parts look like, and I would instruct her not to answer. THE WITNESS: On the instruction of my lawyer, I must choose to assert my Fifth Amendment right. BY MR. KUVIN: Q. Have you heard anyone other than your lawyers that have described what any of Mr. Epstein's body parts look like? MR. RHEINHART: Objection to the form. It is irrelevant what she's heard from other people, and again, it presumes facts that she's not acknowledged. It is compound, and it is harassing at this point. THE WITNESS: On instruction of my lawyer, I must choose to invoke my Fifth Amendment right. BY MR. KUVIN: Q. Were you consulted with respect to the non-prosecution agreement that was entered into with the United States Attorney's Office for the Southern	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. RHEINHART: Objection to the form. It assumes any knowledge of B.B. or any incidents that would have occurred at a home purporting to belong to a person by the name of Jeffrey Epstein, and instruct her not to answer. THE WITNESS: Upon instruction from my lawyer, I must choose to invoke my Fifth Amendment right. BY MR. KUVIN: Q. Do you agree with me that C.L. was emotionally traumatized as a result of the incidents that occurred at Jeffrey Epstein's home? MR. RHEINHART: Same objection as to the previous question, and instruct the witness not to answer. THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. Do you know Jane Doe No. 102? MR. RHEINHART: Instruct the witness not

right. By MR KUVIN: Q. Have you known Jeffrey Epstein to keep underage, under the age of 18, sex slaves? MR. RHEINHART: Objection to the form both as to ambiguity as to what you mean by "sex slaves," and "keep," also the standing objection as to any knowledge of Mr. Epstein and instruct the witness not to answer, and "keep," also the standing objection as to any knowledge of Mr. Epstein and instruct the witness not to answer, and "keep," also the standing objection as to any knowledge of Mr. Epstein and instruct the witness not to answer, and the question is compound. THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth are part of Mc Squared Modeling Agency? MR. RHEINHART: Objection to the form. It assumes knowledge of an entity by the name of acknowledged and therefore I instruction of my lawyer, I must choose to invoke my Fifth Amendment right. Page 166 Squared, if you know? MR. RHEINHART: Instruct the witness not to answer, and the question is compound. THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment right. Page 166 Squared, if you know? MR. RHEINHART: Instruct the witness not to answer and instruct the witness not to answer. And the question is compound. THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment right. Page 166 Squared, if you know? MR. RHEINHART: Objection to the form. It is an witness not to answer. And the question is compound. THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment right. Page 166 Squared, if you know? MR. RHEINHART: Objection to the form and assumes knowledge as to Mr. Epstein and as to to answer. O, Do you work with Jeffrey Epstein to get visus for out-of-the-country models or models that are are strike that. Do you work with Jeffrey Epstein to get visus for girls from out of the country to work as models for MC Squared? MR. RHEINHART: Instruct the witness not to answer. THE WITNESS: On the instruction of my lawyer,		Page 165		Page 167
2 MR. RIEINHART: Instruct the witness not to answer, and the question is compound. 1 THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment right. 2 MR. RIEINHART: Objection to the form. It assumes knowledge of an entity by the name of Mc Squared Modeling Agency? 3 MR. RIEINHART: Objection to the form. It assumes knowledge of an entity by the name of Mc Squared Modeling which the witness has to answer, and the question is compound. 3 MR. RIEINHART: Objection to the form. It assumes knowledge of an entity by the name of Mc Squared Modeling which the witness has to answer, and the question is compound. 4 THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment right. 4 On the work of the models come from that are part of MC Squared Modeling agency? 4 MR. RIEINHART: Objection to the form. It assumes knowledge and therefore I instruct her not acknowledged and therefore I instruct for not acknowledged and therefore I instruct for not acknowledged and therefore I instruct her not to answer, and the question is compound. 4 THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment right. 4 On by our work with Jeffrey Epstein to get visas for out-of-the-country models and the prostituse them out? 5 WR. RIEINHART: Objection to the form and assumes knowledge as to Mr. Epstein and as to the previous question, same instruction. 5 WR. RIEINHART: Objection to the form and assumes knowledge as to Mr. Epstein to get visas for out-of-the-country models or models that are - strike that. 5 Do you work with Jeffrey Epstein to get visas for gift shar are underage and bring them into the United States so that they can work as models for MC Squared? 5 MR. RIEINHART: Ob	2	right.	1	in New York?
4 underage, under the age of 18, sex slaves? 5 MR. RHEINHART: Objection to the form both as to ambiguity as to what you mean by "sex slaves," and "keep," also the standing objection as to any knowledge of Mr. Epstein and instruct the witness not to answer. 10 and instruct the witness not to answer. 11 lawyer, I must choose to invoke my Fifth Amendment right. 12 Amendment right. 13 BY MR. KUVIN: 14 Awyer, I must choose to invoke my Fifth Amendment right. 15 assumes knowledge and therefore I instruct her not to answer, and the question is compound. 16 MR. Capaared Modeling which the witness has not asknowledged and therefore I instruct her not to answer, and the question is compound. 17 THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment right. 18 Squared, if you know? 19 MR. RHEINHART: Shejection to the form of the same of the previous question, same instruction. 19 Amendment right. 20 Who gets visas for the models at MC 21 THE WITNESS: On the instruction of my lawyer, I must choose to invoke my Fifth Amendment right. 22 MR. RHEINHART: Shejection to get visas for out-of-the-country models or models that are restrike that. 23 Do you work with Jeffrey Epstein to get visas for out-of-the-country models or models that are restrike that. 24 Do you work with Jeffrey Epstein to get visas for out-of-the-country models or models that are underage and foring them into the United States so that they can work as models for MC Squared? 24 MR. RHEINHART: Objection to the form and assumes knowledge as to Mr. Epstein and as to MC Squared and other matters that are not admitted or acknowledged by this witness. The question is compound. I would instruct her not to answer. 25 MR. RHEINHART: Objection to the form and assumes knowledge as to Mr. Epstein and as to MC Squared and other matters that are not admitted or acknowledged by this witness. The question is compound. I would instruct her not to answer tased on the Fifth Amendment right. 26 Do you work with Jeffrey Epstein		-	2	[8
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	Page 169		Page 171
1	to answer the question based on her Fifth	1	THE WITNESS: On the instruction from my
2	Amendment privilege.	2	lawyer, I choose to invoke my Fifth Amendment
3	THE WITNESS: On the instruction of my	3	right.
4	lawyer, I must choose to invoke my Fifth	4	BY MR. KUVIN:
5	Amendment right.	5	Q. Would you agree with me that Jeffrey
6	BY MR. KUVIN:	6	Epstein has a list of underage girls that live
7	Q. In fact, you were around when	7	within a close proximity to all of his different
8	Jeffrey Epstein bought Radar Online, were you not?	8	homes in every different state?
9	MR. RHEINHART: Objection to the form,	9	MR. RHEINHART: Objection to the form in
10	standing objection as to any knowledge of	10	that it assumes Mr. Epstein has homes in every
11	Jeffrey Epstein or of Radar Online, and	11	single state and that she knows who Mr. Epstein
12	instruct the witness not to answer.	12	is, and therefore I instruct her not to answer.
13	THE WITNESS: On the instruction from my	13	THE WITNESS: On advice of my lawyer, I
14	lawyer, I must choose to invoke my Fifth	14	must choose to invoke my Fifth Amendment right.
15	Amendment right.	15	BY MR. KUVIN:
16	BY MR. KUVIN:	16	Q. You're aware Mr. Epstein has a home in New
17	Q. Are you aware that Jeffrey Epstein	17	York, right?
18	accessed or obtained underage girls through his	18	MR. RHEINHART: Instruct the witness not
19	Radar connection?	19	to answer, and standing objection of knowledge
20		20	
21	MR. RHEINHART: Same objection as	21	of Mr. Epstein.
22	previously stated to the last question and same	22	THE WITNESS: On the instruction of my
1	instruction.		lawyer, I must invoke my Fifth Amendment right.
23	THE WITNESS: On the instruction from my	23	BY MR. KUVIN:
24	lawyer, I must choose to invoke my Fifth	24	Q. Are you aware that he has a home in New
25	Amendment privilege.	25	Mexico?
	Page 170		Page 172
1	BY MR. KUVIN:	1	MR. RHEINHART: By he, you mean
1 2	BY MR. KUVIN: Q. How many different properties does	2	MR. RHEINHART: By he, you mean Mr. Epstein?
1	BY MR. KUVIN: Q. How many different properties does Jeffrey Epstein own?	}	MR. RHEINHART: By he, you mean Mr. Epstein? MR. KUVIN: Yeah.
2	BY MR. KUVIN: Q. How many different properties does Jeffrey Epstein own? MR. RHEINHART: Objection to the form,	2 3 4	MR. RHEINHART: By he, you mean Mr. Epstein? MR. KUVIN: Yeah. MR. RHEINHART: Got to make sure the
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2 3 4	BY MR. KUVIN: Q. How many different properties does Jeffrey Epstein own? MR. RHEINHART: Objection to the form, standing objection. Instruct the witness not to answer.	2 3 4 5 6	MR. RHEINHART: By he, you mean Mr. Epstein? MR. KUVIN: Yeah. MR. RHEINHART: Got to make sure the question is clear. MR. KUVIN: Yes.
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	Page 173		Page 175
1	previously stated, the standing objection and	1	to Mr. Epstein's house on Palm Beach, you were aware
2	instruct her not to answer.	2	that they were brought so that Mr. Epstein could
3	THE WITNESS: On the instruction of my	3	molest them, correct?
4	lawyer, I must choose to invoke my Fifth	4	MR. RHEINHART: Objection to the form as
5	Amendment right.	5	to knowledge of Mr. Epstein, as to knowledge of
6	BY MR. KUVIN:	6	any home on Palm Beach, and ambiguous as to the
7	Q. Now, you're also aware, are you not, that	7	term "molest," and instruct the witness not to
8	Jeffrey Epstein would pay other girls to bring	8	answer.
		9	THE WITNESS: On the instruction from my
9	additional underage girls to him for naked massages,	10	•
10	are you not?	11	lawyer, I must choose to invoke my Fifth
11	MR. RHEINHART: Standing objection and	12	Amendment right.
12	instruct the witness not to answer.		BY MR. KUVIN:
13	THE WITNESS: On the instruction from my	13	Q. You're aware that Mr. Epstein raped
14	lawyer, I must choose to invoke my Fifth	14	several underage minors in his bedroom?
15	Amendment privilege.	15	MR. RHEINHART: Objection to the form as
16	BY MR. KUVIN:	16	to knowledge of Mr. Epstein, and also ambiguous
17	Q. And, in fact, you frequently would pay	17	as to the term "rape."
18	other girls to bring additional girls under the age	18	THE WITNESS: On the instruction of my
19	of 18 to Mr. Epstein for naked massages?	19	lawyer, I must choose to invoke my Fifth
20	MR. RHEINHART: Objection to the form,	20	Amendment rights.
21	standing objection as to Mr. Epstein, also as	21	BY MR. KUVIN:
22	to any knowledge of any naked massages by	22	Q. Do you know what the term "rape" means?
23	anybody to anybody. Instruct the witness not	23	MR. RHEINHART: Not as you used it. If
24	to answer.	24	you want to tell us what you mean by when you
25	THE WITNESS: On the instruction of my	25	used it, we'll be happy to answer
	T) 2 T 4		
	Page 174		Page 176
1	"	1	Page 176 MR. KUVIN: I want to know if
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1 2 3	lawyer, I choose to invoke my Fifth Amendment		MR. KUVIN: I want to know if
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	Page 177		Page 179
1	I'm asking her her understanding of the word.	1	or vaginal penetration or union with the sexual
2	MR. RHEINHART: And I am instructing her	2	organ of another, or oral, anal or vaginal
3	not to answer it because that question is not	3	penetration of another with any other object,
4	likely to lead to discoverable evidence. It's	4	or with any object. Excuse me. All right?
5	simply meant to harass her. And you can define	5	MR. RHEINHART: Okay.
6	the term in your question.	6	BY MR. KUVIN:
7	MR. KUVIN: Well, with all due respect,	7	Q. Do you understand that definition as I
8	it's certainly not to harass if there have been	8	have explained it to you, or would you like me to
9	girls that were alleging that they were raped.	9	read it again?
10	MR. RHEINHART: Well, you define what you	10	A. Read it again, please.
11	mean by when you say that they allege that they	11	Q. Absolutely. Florida law defines "rape" as
12	have been raped, and she will be happy to	12	oral, anal or vaginal penetration by, or union with
13	evaluate your question.	13	the sexual organ of another; or oral, anal or
14	MR. KUVIN: And that's what I'm trying to	14	vaginal penetration by another with any object. And
15	understand.	15	obviously that is without the other's consent.
16	MR. RHEINHART: She's not going to	16	A. You did not say that.
17	speculate on what you mean when you frame a	17	MR. RHEINHART: Okay.
18	word in your question.	18	BY MR. KUVIN:
19	MR. KUVIN: That's exactly what I'm trying	19	Q. Adding without the other's consent,
20	to do. I'm trying to make sure that we are	20	obviously, to that definition.
21	using the same definition, so I would like to	21	Now, let's use that definition for
22	use her definition of the word.	22	"rape," because that's as it's defined by Florida
23	MR. RHEINHART: Right. She's not going to	23	law. Using that definition, are you aware, as you
24	answer it, so you can either move on we can	24	sit here today, that Jeffrey Epstein has raped
25	stop.	25	underage girls?
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	Page 178		Page 180
1	Page 178 MR. KUVIN: Okav. So you're instructing	1	Page 180 MR. RHEINHART: Standing objection to the
1 2	MR. KUVIN: Okay. So you're instructing	1 2	MR. RHEINHART: Standing objection to the
2	MR. KUVIN: Okay. So you're instructing her not to answer the question?	2	MR. RHEINHART: Standing objection to the form of the question, and I would instruct the
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1	Page 181		Page 183
1	doesn't know, and I instruct her not to answer.	1	MR. RHEINHART: Same objection as
2	THE WITNESS: On the instruction of my	2	previously stated as to ambiguity and compound,
3	lawyer, I must choose to invoke my Fifth	3	and instruct the witness not to answer.
4	Amendment right.	4	THE WITNESS: On the instruction of my
5	BY MR. KUVIN:	5	lawyer, I must choose to invoke my Fifth
6	Q. Do you agree that Jeffrey Epstein has	6	Amendment right.
7	raped hundreds of girls under the age of 18?	7	BY MR. KUVIN:
8	MR. RHEINHART: Objection to the form,	8	Q. Have you ever had sexual contact in any
9	standing objection as to any knowledge of	9	manner with any underage girls that were brought to
10	Jeffrey Epstein. Instruct the witness not to	10	Mr. Epstein's home?
11	answer.	11	MR. RHEINHART: Objection to the form.
12	THE WITNESS: On the instruction of my	12	Standing objection, compound, instruct the
13	lawyer, I must choose to invoke my Fifth	13	witness not to answer.
14	Amendment privilege.	14	THE WITNESS: On the instruction of my
15	BY MR. KUVIN:	15	lawyer, I must choose to invoke my Fifth
16	Q. You're aware, are you not, that	16	Amendment right.
17	Jeffrey Epstein has raped hundreds of girls under	17	BY MR. KUVIN:
18	the age of 17?	18	Q. Did you keep an appointment book for
19	MR. RHEINHART: Objection to the form as	19	Mr. Epstein?
20	leading. Instruct the witness not to answer	20	MR. RHEINHART: Objection to the form,
21	for the reasons previously stated to the last	21	standing objection. Instruct the witness not
22	the question.	22	to answer.
23	THE WITNESS: On the instruction of my	23	THE WITNESS: On the instruction of my
24	lawyer, I must choose to assert my Fifth	24	lawyer, I must choose to invoke my Fifth
25	Amendment right	25	Amendment right.
	Page 182		Page 184
1			190 101
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1	BY MR. KUVIN:	1	BY MR. KUVIN:
2	Q. You're aware, as you sit here today, are	2	Q. Did you preserve a document that shows the
2 3	Q. You're aware, as you sit here today, are you not, that Jeffrey Epstein has raped hundreds of	2 3	Q. Did you preserve a document that shows the appointments kept for Mr. Epstein in the years 2004?
2 3 4	Q. You're aware, as you sit here today, are you not, that Jeffrey Epstein has raped hundreds of girls under the age of 16?	2 3 4	Q. Did you preserve a document that shows the appointments kept for Mr. Epstein in the years 2004? MR. RHEINHART: Objection to the form, the
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1	BY MR. KUVIN:	1	MR. RHEINHART: Yeah, whenever you get to
2	Q. Have you provided any appointment books to	2	a convenient point in your questioning, I think
3	anyone with respect to appointments for Mr. Epstein?	3	we can use a break. If you're in the middle of
4	MR. RHEINHART: Same standing objection as	4	something, I don't want to stop you.
5	to knowledge of Mr. Epstein. The question is	5	MR. KUVIN: No, this is fine. We can take
6	compound and instruct the witness not to	6	a quick break. Five minutes?
7	answer.	7	MR. RHEINHART: Yes, thank you.
8	THE WITNESS: On the instruction of my	8	THE VIDEOGRAPHER: We're now off the
9	lawyer, I must choose to invoke my Fifth	9	
10	Amendment right.	10	record. It is 2:08 p.m.
11	BY MR, KUVIN:	11	(A brief recess was held.)
12		12	
13	Q. Would Ep Mr. Epstein pay the underage		
14	girls more money if they took off both their tops and their bottoms?	13	
1		14	
15	MR. RHEINHART: Objection to the form,	15	
16	standing objection. Instruct the witness not	16	
17	to answer.	17	
18	THE WITNESS: On the instruction of my	18	
19	lawyer, I must choose to invoke my Fifth	19	
20	Amendment right.	20	
21	BY MR. KUVIN:	21	
22	Q. Would Mr. Epstein pay the underage girls	22	
23	more if they would actually touch his penis?	23	
24	MR. RHEINHART: Same instruction, same	24	
25	objection.	25	
	Page 186	////-/-/	
1	THE WITNESS: On the instruction of my		
2	lawyer, I must choose to assert my Fifth		
3	Amendment right.		
4	BY MR. KUVIN:		
5	Q. Would Mr. Epstein pay the underage girls		
6	more if he would allow them to have sex with them?		
7	MR. RHEINHART: Can you restate that		
8	again?		
9	MR. KUVIN: Yes.		
10	BY MR. KUVIN: 1 es.		
11	\$		
12	Q. Would Mr. Epstein pay the underage girls		
1	more money if they would allow him to have sex with		
13	them?		
14	MR. RHEINHART: Objection to the form,		
15	standing objection. Instruct the witness not		
16	to answer.		
17	THE WITNESS: On the instruction of my		
18	lawyer, I must invoke my Fifth Amendment right.		
19	MR. KUVIN: Hang on one second. You can		
20	stop at any time I'll sign it.		
21	MR. RHEINHART: Mr. Kuvin, I don't know if		
22	you're getting to a convenient breaking point		
23	but		
24	MR. KUVIN: Do you want to take a quick		
25	one?		