

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

-vs-

VOLUME I OF II

JEFFREY EPSTEIN,

Defendant.

Related cases:

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

VIDEOTAPED DEPOSITION OF
JANE DOE NO. 3

Friday, February 19, 2010
10:07 - 5:09 p.m.

250 Australian Avenue
Suite 1500
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting Services
Job No.: 1298

EXHIBIT B

ce-16-16, 01

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1 any additional sworn testimony regarding Mr. Epstein
2 to anyone?

3 A. No.

4 Q. Did you ever give a handwritten report to
5 anyone as to what occurred at Mr. Epstein's house,
6 and I'm not interested again in what happened, once
7 you hired Mr. Herman?

8 A. I don't remember.

9 Q. At any time -- well, let me ask it this
10 way: After you filed your -- or after the Palm
11 Beach Police Department met with you, Officer
12 Recarey met with you, did you ever discuss that
13 meeting, that is the conversation you had with them
14 with Ms. J.S., that is this is what they asked me;
15 what did they ask you?

16 A. What?

17 Q. You said J.S. was around you at the
18 time --

19 A. Yes.

20 Q. -- when the Palm Beach Police Department
21 came, correct?

22 A. Yes.

23 Q. Okay. After -- did they interview her as
24 well the same day?

25 A. No.

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1 Q. Okay. Do you know whether she ever went
2 to Epstein's?

3 A. Yes.

4 Q. Okay. And how, how did you know that?

5 A. She told me.

6 Q. Okay. Did she tell you before the police
7 department ever contacted you?

8 A. Yes.

9 Q. Okay. And did you know J.S. -- was she
10 one of your good friends at the time?

11 A. Yes.

12 Q. Okay. She's still a good friend?

13 A. Yes.

14 Q. Okay. Do you know whether she's a
15 plaintiff or has ever filed any type of claim?

16 A. I don't know.

17 Q. Okay. Did you ever tell her that you had
18 filed a claim?

19 A. No.

20 Q. She just knows that you went to Epstein's
21 home?

22 A. Yes.

23 Q. Okay. Did she ever tell you what happened
24 at Epstein's home?

25 A. Yes.

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1 Q. Okay. Did you, did you, did she tell you
2 that before you ever went to Epstein's home?

3 A. Yes.

4 Q. Okay. And what was the occasion of her
5 telling -- her, J.S., telling you what had occurred
6 at Epstein -- or that she had been to Epstein's
7 home? Do you want me to ask that again --

8 A. Yes.

9 Q. -- because I confused myself.

10 You said that J.S. told you, before
11 you first went to Mr. Epstein's house which you
12 described as being approximately in June of '04,
13 that she had been to Epstein's home; is that
14 correct?

15 A. Yes.

16 Q. Okay. And, and what was the occasion of
17 her telling you, that is how did it come about that
18 she told you she had been to Epstein's home?

19 A. How did she tell me?

20 Q. No. What was the occasion? Where were
21 you and how did you -- how did the subject come up?

22 A. Haley asked me if I wanted to do it.

23 Q. Okay. And Haley meaning Haley --

24 A. Robson.

25 Q. And where were you-all at the time?

Page 85

1 A. At a girlfriend's house.

2 Q. Whose house were you at?

3 A. Jane Doe No. 4's.

4 Q. Jane Doe No. 4 who?

5 A. Doe No. 4.

6 Q. And how did you know Jane Doe No. 4?

7 A. I grew up with her in LaMancha. I went to
8 school with her.

9 Q. Same grade?

10 A. No.

11 Q. Older, younger?

12 A. Older.

13 Q. How much older?

14 A. A year.

15 MR. MERMELSTEIN: Just to be clear, your
16 question as to who was older, her or Jane Doe
17 No. 4?

18 BY MR. CRITTON:

19 Q. I'm assuming you meant Jane Doe No. 4 was
20 a year older than you.

21 A. Yes, sir.

22 MR. CRITTON: I think it was just you.

23 MR. MERMELSTEIN: I'm the only one that
24 was confused, right?

25 MR. CRITTON: Yeah.

22 (Pages 82 to 85)

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1 BY MR. CRITTON:

2 Q. And Jane Doe No. 4, is she from pretty
3 much a middle class family as well?

4 A. Yes.

5 Q. All right. And Jane Doe No. 4 is the one,
6 she's a soccer player, wasn't she?

7 A. Yes.

8 Q. And did you and Jane Doe No. 4 -- well,
9 let me strike that.

10 Let's see, if you went in
11 approximately June of '04, approximately when did
12 this conversation take place, how many months before
13 you ultimately went?

14 A. What conversation?

15 Q. Well, you said that Haley asked you, if I
16 understood you, Haley asked you if you wanted to go?

17 A. Yes.

18 Q. Okay. Is that the first time Haley had
19 ever brought it up to you?

20 A. No.

21 Q. So, at least at the time that Haley
22 brought up going to Mr. Epstein's house or going
23 to -- did you know his name was Epstein at that
24 time?

25 A. Jeffrey.

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1 Q. Just Jeffrey. All right. When she said,
2 she asked you, apparently again, if you were
3 interested in going to Mr. -- to, to Jeffrey's house
4 to give him a massage, at least on this occasion
5 Jane Doe No. 4 -- you were at Jane Doe No. 4's
6 house, and J.S. was there --

7 A. No.

8 Q. -- as well as Haley? Is that wrong?

9 A. That is wrong.

10 Q. Okay. Then let me ask a question. I
11 thought you -- had you learned that J.S., had, J.S.
12 had been at Jeffrey's house sometime before this
13 conversation?

14 A. Yes.

15 Q. By "this conversation," I mean when Haley
16 asked you, you were at Jane Doe No. 4's house.

17 A. Yes.

18 Q. How much earlier was the conversation
19 where J.S. told you she had been to Jeffrey's house?

20 A. A lot earlier.

21 Q. A number of months?

22 A. Probably, yeah.

23 Q. And when J.S. told you that, what did she
24 tell you; that is what were the circumstances of her
25 telling you? Who was there? Where were you?

Page 88

1 A. Don't know exactly where I was. I don't
2 remember. She told me that she gave a massage to
3 Jeffrey for \$200.

4 Q. Did she tell you how many times she'd done
5 it?

6 A. No.

7 Q. Did you ask her about Jeffrey?

8 A. No.

9 Q. Did you say, what are you doing giving --
10 did she tell you how old Jeffrey was?

11 A. No.

12 Q. Okay. Had you ever heard -- or let me
13 strike that.

14 At the time that J.S. mentioned that,
15 first mentioned to you that she had given a guy
16 named Jeffrey a massage for \$200, had you, had Haley
17 ever talked to you at all?

18 A. Yes.

19 Q. And Haley had talked to you a number of
20 months before you eventually went to Mr. Epstein's
21 home; is that correct?

22 A. Yes.

23 Q. Or to Jeffrey's home. Where were you when
24 Haley Robson first said something to you about
25 Jeffrey?

Page 89

1 A. Jane Doe No. 4's house.

2 Q. Okay. And who was there at the time, you,
3 Jane Doe No. 4, Haley; anyone else?

4 A. Nope.

5 Q. And how many months was this prior to your
6 ultimately going to Jeffrey's home?

7 A. I don't remember.

8 Q. Four months, six months?

9 A. I don't remember.

10 Q. A number of months?

11 A. I really don't remember.

12 Q. You don't know whether it was a day or a
13 number of months?

14 MR. MERMELSTEIN: Objection. She's
15 answered the question.

16 THE WITNESS: I don't remember. I, I
17 don't remember.

18 BY MR. CRITTON:

19 Q. I just want you to make sure, because I
20 want to make sure that the ladies and gentlemen
21 understand.

22 So, the first conversation where
23 Haley ever referenced going to Jeffrey's house, you
24 were at Jane Doe No. 4 home, you, Haley and Jane Doe
25 No. 4 were the only people there, correct?

23 (Pages 86 to 89)

Page 90

1 A. Correct.
 2 Q. And then we know you went to Mr. Epstein's
 3 home, or at least by your testimony, sometime in
 4 June of '04; is that correct?
 5 A. Yes.
 6 Q. So, and is it your testimony as to when
 7 this conversation first took place, where Haley
 8 asked you if you wanted to go to Jeffrey's home, you
 9 don't recall whether that was a week before you
 10 ultimately went or months; is that correct?
 11 A. Correct.
 12 Q. What did Haley say to you the first
 13 occasion at Jane Doe No. 4's home?
 14 A. Excuse me. You can make quick money, 200
 15 bucks just to give a guy a massage.
 16 Q. And did she tell you about who the guy
 17 was?
 18 A. Yeah, his name is Jeffrey Epstein.
 19 Q. And she said Epstein?
 20 A. Yes.
 21 Q. Okay. And did she tell you where he
 22 lived?
 23 A. On Palm Beach.
 24 Q. I assume you'd been to Palm Beach before.
 25 A. Yes.

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1 Q. And did she tell you anything about it,
 2 that is, his age, what he did?
 3 A. No.
 4 Q. Did she tell you anything about how old he
 5 was, that is, whether he was your age, whether he
 6 was an older person?
 7 A. No.
 8 Q. Did you ask?
 9 A. I don't remember.
 10 Q. Did, did you say, wait a minute, why
 11 would -- well, let me strike that.
 12 Did she, Haley, say that she had been
 13 there?
 14 A. Yes.
 15 Q. Did she say that she'd given him a massage
 16 before?
 17 A. No.
 18 Q. Okay. Did you say, why are you asking me
 19 if I would be interested in going?
 20 A. I don't remember.
 21 Q. Okay. Had you ever given a person a
 22 massage before, before that period of time?
 23 A. Yes.
 24 Q. Okay. To whom had you given a massage?
 25 A. My mom, my cousin.

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1 Q. Ever done it with a, with a guy?
 2 A. No.
 3 Q. A boyfriend?
 4 A. No.
 5 Q. Did Jane Doe No. 4 say anything at that
 6 time when Haley asked you?
 7 A. Excuse me. I don't remember.
 8 Q. Did you know that Jane Doe No. 4 had
 9 gone --
 10 A. No.
 11 Q. -- to Epstein's home at that time?
 12 A. No.
 13 Q. Okay. At some point she told you, didn't
 14 she?
 15 A. She didn't tell me, no.
 16 Q. At some point did you come to learn that
 17 Jane Doe No. 4 had been to Mr. Epstein's home?
 18 A. Yes.
 19 Q. Okay. From whom did you learn that fact?
 20 A. Word of mouth.
 21 Q. When you say, "word of mouth," meaning
 22 what, it was just common knowledge?
 23 A. We all hung out together.
 24 Q. So, at some point somebody mentioned that
 25 Jane Doe No. 4 had been to Epstein's house?

Page 93

1 A. Yes.
 2 Q. Did you ever ask Jane Doe No. 4, say, hey,
 3 how many times have you been to Epstein's house?
 4 A. No.
 5 Q. Okay. Did -- when the word of mouth that
 6 Jane Doe No. 4 had been to Mr. Epstein's house, was
 7 that kind of discussed when you guys would get
 8 together, that is, who had been to Epstein's house?
 9 A. Can you repeat that, please?
 10 Q. Sure. You said you learned that Jane Doe
 11 No. 4 had gone to Mr. Epstein's house by word of
 12 mouth because you were all friends.
 13 A. Yes.
 14 Q. Okay. And somebody brought it up, but you
 15 can't identify who the person is that brought it up.
 16 A. Yes.
 17 Q. Okay. And did you learn from at least
 18 these conversations, before you ever went to
 19 Mr. Epstein's house, that Jane Doe No. 4 had been
 20 there on many occasions?
 21 A. No, I did not know that.
 22 Q. Okay. Did you -- you knew for sure she'd
 23 been there once, but you didn't know how many times
 24 she'd been there?
 25 A. Correct.

24 (Pages 90 to 93)

Page 102

1 Q. All right. And how much longer did you,
2 the two of you continue to date?

3 A. Maybe about two years, a year and a half.

4 Q. Two years after that?

5 A. Yes.

6 Q. So you dated Clint about a year, a year to
7 a year and a half before you had this conversation
8 about giving a massage to Mr. Epstein, and then you
9 dated another two years after that?

10 A. About a year after that.

11 Q. Okay.

12 A. Yeah.

13 Q. All right. So how much time transpired or
14 passed before you then had a conversation with --
15 another conversation about the possibility of giving
16 a massage to Jeffrey?

17 A. I have no idea.

18 Q. Was it a month, a week, a year, two years?

19 A. A while.

20 Q. Was it after then?

21 A. I was already broken up with Clint.

22 Q. All right. So it had to have been about a
23 year later. A year --

24 A. Me and him were on and off. We didn't have a
25 steady relationship.

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1 Q. So now you're no longer dating Clint, or
2 you're on and off with Clint at this point in time?

3 A. Yes.

4 Q. And what happens? How does the topic come
5 up again?

6 A. I was approached again by Haley.

7 Q. Where were you at the time?

8 A. I don't remember.

9 Q. Do you remember who was there?

10 A. I don't remember.

11 Q. How often -- were you and Haley good
12 friends?

13 A. No.

14 Q. Were you friends?

15 A. Yes.

16 Q. Okay. More acquaintance-type friends?

17 A. Yes.

18 Q. Okay. Was she good friends with Jane Doe
19 No. 4. Were she and Jane Doe No. 4 good friends?

20 A. I don't know their relationship.

21 Q. Okay. Well, at least the first time
22 when -- that you're at Jane Doe No. 4's house when
23 Haley mentioned to you, do you, were you interested
24 in making -- giving a massage to Jeffrey, there was
25 only the three of you. So were any of you good

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1 friends?

2 A. Excuse me. Yes, me and Jane Doe No. 4 were
3 good friends, yes.

4 Q. Are you and Jane Doe No. 4 still good
5 friends?

6 A. No.

7 Q. Okay. When did you, you and Jane Doe
8 No. 4 stop being good friends?

9 A. When she went away to college.

10 Q. When she went to Lynn University?

11 A. Yes.

12 Q. Do you know whether Jane Doe No. 4 is a
13 plaintiff in a lawsuit against Mr. Epstein?

14 A. I don't know.

15 Q. Okay. Do you know if I -- do you know
16 whether your current lawyer is representing Ms. Doe
17 No. 4?

18 A. Yes.

19 Q. Okay. How do you know that?

20 A. Because I've spoken with her.

21 Q. With Jane Doe No. 4?

22 A. (Witness nods head.)

23 Q. Okay. And so --

24 THE COURT REPORTER: Is that a yes?

25 THE WITNESS: Yes. Yes, sorry.

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1 BY MR. CRITTON:

2 Q. Okay. And she told you -- when did you
3 last speak with Jane Doe No. 4?

4 A. A couple of days ago.

5 Q. All right.

6 A. I need to take a break, please.

7 Q. Can I have two more minutes?

8 A. No, I'm tired. I need to take a break,
9 please.

10 MR. CRITTON: All right.

11 THE VIDEOGRAPHER: We're going off the
12 record at 11:43 a.m.

13 (A brief recess was held.)

14 THE VIDEOGRAPHER: We're back on the
15 record at 11:57 a.m.

16 BY MR. CRITTON:

17 Q. We were talking about Jane Doe No. 4, and
18 you said that you spoke with her a couple of days
19 ago.

20 A. Yes.

21 Q. How long have you known that Jane Doe
22 No. 4 is a plaintiff against Mr. Epstein?

23 A. A little while.

24 Q. What's a little while mean to you, a
25 month, a week, a year?

27 (Pages 102 to 105)

Page 90

1 A. Correct.
 2 Q. And then we know you went to Mr. Epstein's
 3 home, or at least by your testimony, sometime in
 4 June of '04; is that correct?
 5 A. Yes.
 6 Q. So, and is it your testimony as to when
 7 this conversation first took place, where Haley
 8 asked you if you wanted to go to Jeffrey's home, you
 9 don't recall whether that was a week before you
 10 ultimately went or months; is that correct?
 11 A. Correct.
 12 Q. What did Haley say to you the first
 13 occasion at Jane Doe No. 4's home?
 14 A. Excuse me. You can make quick money, 200
 15 bucks just to give a guy a massage.
 16 Q. And did she tell you about who the guy
 17 was?
 18 A. Yeah, his name is Jeffrey Epstein.
 19 Q. And she said Epstein?
 20 A. Yes.
 21 Q. Okay. And did she tell you where he
 22 lived?
 23 A. On Palm Beach.
 24 Q. I assume you'd been to Palm Beach before.
 25 A. Yes.

Page 91

1 Q. And did she tell you anything about it,
 2 that is, his age, what he did?
 3 A. No.
 4 Q. Did she tell you anything about how old he
 5 was, that is, whether he was your age, whether he
 6 was an older person?
 7 A. No.
 8 Q. Did you ask?
 9 A. I don't remember.
 10 Q. Did, did you say, wait a minute, why
 11 would -- well, let me strike that.
 12 Did she, Haley, say that she had been
 13 there?
 14 A. Yes.
 15 Q. Did she say that she'd given him a massage
 16 before?
 17 A. No.
 18 Q. Okay. Did you say, why are you asking me
 19 if I would be interested in going?
 20 A. I don't remember.
 21 Q. Okay. Had you ever given a person a
 22 massage before, before that period of time?
 23 A. Yes.
 24 Q. Okay. To whom had you given a massage?
 25 A. My mom, my cousin.

Page 92

1 Q. Ever done it with a, with a guy?
 2 A. No.
 3 Q. A boyfriend?
 4 A. No.
 5 Q. Did Jane Doe No. 4 say anything at that
 6 time when Haley asked you?
 7 A. Excuse me. I don't remember.
 8 Q. Did you know that Jane Doe No. 4 had
 9 gone --
 10 A. No.
 11 Q. -- to Epstein's home at that time?
 12 A. No.
 13 Q. Okay. At some point she told you, didn't
 14 she?
 15 A. She didn't tell me, no.
 16 Q. At some point did you come to learn that
 17 Jane Doe No. 4 had been to Mr. Epstein's home?
 18 A. Yes.
 19 Q. Okay. From whom did you learn that fact?
 20 A. Word of mouth.
 21 Q. When you say, "word of mouth," meaning
 22 what, it was just common knowledge?
 23 A. We all hung out together.
 24 Q. So, at some point somebody mentioned that
 25 Jane Doe No. 4 had been to Epstein's house?

Page 93

1 A. Yes.
 2 Q. Did you ever ask Jane Doe No. 4, say, hey,
 3 how many times have you been to Epstein's house?
 4 A. No.
 5 Q. Okay. Did -- when the word of mouth that
 6 Jane Doe No. 4 had been to Mr. Epstein's house, was
 7 that kind of discussed when you guys would get
 8 together, that is, who had been to Epstein's house?
 9 A. Can you repeat that, please?
 10 Q. Sure. You said you learned that Jane Doe
 11 No. 4 had gone to Mr. Epstein's house by word of
 12 mouth because you were all friends.
 13 A. Yes.
 14 Q. Okay. And somebody brought it up, but you
 15 can't identify who the person is that brought it up.
 16 A. Yes.
 17 Q. Okay. And did you learn from at least
 18 these conversations, before you ever went to
 19 Mr. Epstein's house, that Jane Doe No. 4 had been
 20 there on many occasions?
 21 A. No, I did not know that.
 22 Q. Okay. Did you -- you knew for sure she'd
 23 been there once, but you didn't know how many times
 24 she'd been there?
 25 A. Correct.

24 (Pages 90 to 93)

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1 Q. Okay. Did, did you at some point get the
2 drift -- not the drift -- did you, did you come to
3 at least understand, based on the conversations that
4 were going on before you ever went to Mr. Epstein's,
5 that she had been there a number of times?

6 A. No.

7 Q. Just that she had been there?

8 A. Correct.

9 Q. All right. But you understood that she
10 had also gone to Epstein's to give him a massage?

11 A. Correct.

12 Q. Who else did you learn, other than Haley
13 and Jane Doe No. 4, at least on the first occasion,
14 did you learn or know that had given Mr. Epstein a
15 massage, or purportedly had given him a massage?

16 A. I didn't know Haley given, has given Epstein a
17 massage.

18 Q. You just knew that she asked you if you
19 would be interested?

20 A. Yes.

21 Q. Okay. And did you ask her at that time,
22 say, did you give him -- have you ever given him a
23 massage?

24 A. No.

25 Q. Okay. At the time she asked -- first

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1 asked you, when you were at Jane Doe No. 4's house,
2 what was your response?

3 A. I don't know; I'll have to think about it.

4 Q. Okay. What questions did you ask before
5 you even said, I don't know; I'll have to think
6 about it?

7 A. What happens?

8 Q. Did you -- and what did she say?

9 A. You give him a massage.

10 Q. Okay. And what did you say, well, I have
11 never really given -- I have never given a man a
12 massage, did you tell her that?

13 A. No.

14 Q. And have you ever given a boyfriend a
15 massage, did I ask you that?

16 A. You did ask me that.

17 Q. Okay. You were, you were -- had, already
18 at that point in your time, 2004, had had
19 relationships with other males, true?

20 A. Yes.

21 Q. Okay. And you were sexually active at
22 that point in time, true?

23 A. Yes.

24 Q. All right. And you had never given a male
25 a massage?

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1 A. Not that I remember, no.

2 Q. Okay. Well, did you say, did you say to
3 Haley, as well, what do I have to do for \$200?

4 A. Yes.

5 Q. Okay. And what did she say?

6 A. A massage.

7 Q. Okay. Did you say, what's the massage
8 consist of?

9 A. I did not say that.

10 Q. Okay. Did you say, how long does it have
11 to last?

12 A. Yes.

13 Q. And what did she say?

14 A. Half an hour.

15 Q. All right. And did she tell you where
16 you'd have to go?

17 A. Yes.

18 Q. Did you say, well, who's going to go there
19 with me?

20 A. Yes.

21 Q. All right. And she said?

22 A. She would.

23 Q. All right. And did she say -- did you
24 discuss how you were to get there?

25 A. She already said she would drive.

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1 Q. Okay. And what, what in, at least in your
2 thinking process at that time would cause you even
3 to think that you might have some interest in doing
4 that, that is, going to give some unknown person,
5 unknown to you, at their home a half-hour massage
6 for 200 bucks?

7 MR. MERMELSTEIN: Objection to form.

8 THE WITNESS: Can you repeat that?

9 MR. CRITTON: No, but Cindy can. Cindy
10 will. She can and will.

11 THE WITNESS: Okay.

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

14 THE WITNESS: So you want to know my
15 interest?

16 BY MR. CRITTON:

17 Q. Yeah, why, why -- why you, who is
18 apparently about 16 at the time would have any
19 interest in giving a massage to some unknown male
20 that you had never met, a half-hour massage which
21 you didn't know what it consisted of, for 200 bucks?

22 A. I was young and it was \$200.

23 Q. And if I understood your earlier
24 testimony, you didn't say, well, Haley, have you
25 done it?

25 (Pages 94 to 97)

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1 anything improper or otherwise.

2 Is there -- what, if anything, has caused
3 you now that we have finished about an hour or
4 45-minute lunch break that maybe June of '04 was not
5 the right date, approximately, that you went to
6 Mr. Epstein's home for the first time?

7 A. Okay.

8 THE VIDEOGRAPHER: You're fine.

9 THE WITNESS: Okay. Just thinking about
10 it, like, I don't want, I don't want to make
11 exact dates and may be wrong.

12 BY MR. CRITTON:

13 Q. Could it have been '05?

14 A. It could have been, yes.

15 Q. Would it have been before your birthday in
16 '05 for the first time, or could it have been
17 afterwards?

18 A. After, I think.

19 Q. Okay.

20 A. I don't know.

21 Q. So all you know is that you went to
22 Mr. Epstein's home four times. It could have
23 started in '05. It could have started in '04. You
24 just can't tell us as you sit here today?

25 A. Right, I can't tell you exact dates.

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1 Q. Okay. And you can't tell us -- I mean,
2 there's nothing about -- well, there, there was.
3 You said that one of the visits you had you
4 remembered seeing a -- some sort of Christmas
5 decoration.

6 A. Correct.

7 Q. Okay. And instead of being in
8 December-ish of '04, assuming that's when Christmas
9 decorations come out, it could have been as well
10 December of '05. Is that possible?

11 A. I don't know.

12 Q. Well, I'm asking you, is that possible, it
13 could have been December of '05 as distinct from
14 December of '04, or you just don't know one way or
15 the other?

16 A. I just know that it was around Christmas one
17 of the times.

18 Q. But you can't tell me whether it was '04
19 or '05?

20 A. Correct.

21 Q. Because you don't remember when the first
22 time was?

23 A. Correct.

24 Q. And that could have been sometime in --
25 after your 16th birthday. Could have even been

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1 after your 17th birthday. You just don't remember?

2 A. I first visited Jeffrey, like I stated before,
3 soon after I turned 16.

4 Q. Okay. But we established just by simple
5 math --

6 A. I'm not a math genius.

7 Q. None of us are, that's why we can use --
8 if I add 16 to 88, because you were born in 1988,
9 that takes me to 2004, March of 2004. All right.
10 I'm not trying to be tricky here. I'm trying to --
11 would you agree with me, 16 and 88 is --

12 A. Sixteen, yes.

13 Q. All right. So if it was sometime after
14 that, then it had to have been in '04, or do you
15 want to say it still could have been '05?

16 A. I still say it was after I was 16.

17 Q. Okay. And it still could, could have been
18 in '04; it could have been in '05. You're just not
19 sure?

20 A. Correct.

21 Q. All right. Okay. So let's just stick with
22 the first time, then. So they -- I know you, you
23 told us that Haley asked if you wanted to go. You
24 were with Jane Doe No. 4 only. You were at Jane Doe
25 No. 4's house, just the three of you. You said

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1 you'd think about it. You went back. You talked
2 about it with Clint Brewster who was your boyfriend
3 at that time. He basically said, he discouraged
4 you, as you described earlier, correct?

5 A. Yes.

6 Q. Then. Then sometime later there, now you
7 and Clint were either between, either weren't dating
8 anymore or you were -- I think you said you weren't
9 dating anymore, so somebody -- was that Haley again
10 asked you then again?

11 A. Yes.

12 Q. Okay. And where were you at the time
13 Haley asked you?

14 A. I don't remember.

15 Q. All right. And when she asked you, do you
16 remember whether anyone else was there at the time?

17 A. I don't remember.

18 Q. And did -- what did she say to you?

19 A. Do you want to make \$200 and give a guy a
20 massage, or Jeffrey a massage.

21 Q. And you said -- did you say something
22 like, we talked about this before, I said, no?

23 A. No.

24 Q. Okay. What did you say this time?

25 A. I'll call you back. I'll get back to you,

10 (Pages 214 to 217)

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1 something along that line.

2 Q. And what happened then?

3 A. I agreed to do so and she set it up.

4 Q. Did you, did you call her or did she call
5 you or did you just see her again?

6 A. She initiated it.

7 Q. Okay. What, she called you or did she see
8 you?

9 A. She called me.

10 Q. Okay. And is, and as far as you, you were
11 concerned is that at least you were going to go
12 there, give this Jeffrey chap a massage, and that
13 was the extent of the conversation?

14 A. At first, yes.

15 Q. When you say "at first," you mean at
16 least, at least from the first time she told you --

17 A. Yes.

18 Q. -- the second time?

19 A. Yes.

20 Q. Okay. And even when she spoke to you on
21 the phone, she basically said -- or let me say it,
22 the first time she asked you if you want, you were,
23 when you were at Jane Doe No. 4's house, if you
24 wanted to go give this -- give Jeffrey a massage for
25 200 bucks, that was the extent of the conversation,

Page 219

1 correct?

2 A. Yes.

3 Q. Okay. The second time that she mentioned
4 it, again, it was pretty similar as it was give this
5 Jeffrey chap a massage, 200 bucks?

6 A. Yes.

7 Q. If you want to do it. And you said, I'll
8 think about it?

9 A. Yes.

10 Q. You called her back and said, I'll do it?

11 A. Yes.

12 Q. Okay. And then she said, okay, I'll let
13 you know?

14 A. She'll set it up.

15 Q. All right. And so at least at that time,
16 when you talked to her on the phone and she then
17 called you back and set it up, as far as you were
18 concerned at that time you were going to give a
19 half-hour massage for 200 bucks?

20 A. Yes.

21 Q. And that was the extent of the
22 conversation or, at least, the two conversations and
23 the two phone calls that you two had had?

24 A. At that -- what do you mean?

25 Q. That was the extent of the conversations

Page 220

1 that you had had. She had set it up and she said,
2 okay, we're going to go at such-and-such a time.
3 And that's all she had said to you at least up until
4 the time that she picked you up?

5 A. Correct.

6 Q. Okay. That is the phone conversations,
7 that is the in-person conversations, time one, when
8 you decided no; the second time you said, I'll think
9 about it; the third time is you called her back and
10 said, it's okay, I'll do it; and the fourth time is,
11 she said -- she called you back and said, okay, I
12 set it up for such-and-such a time and I'll pick you
13 up at such-and-such a time. Is that substantially
14 correct, or correct?

15 A. She asked me the first time. I had spoken
16 with my boyfriend, so no. And then she asked me the
17 second time, I told her I'd to think about it. I agreed
18 to it, she set it up.

19 Q. Okay. So second time you did -- I thought
20 you said you, you told her you'd think about it.

21 A. I said I would think about it, and then I
22 agreed to it.

23 Q. The same --

24 A. The second time.

25 Q. Right there at the second occasion that

Page 221

1 she mentioned it to you?

2 A. Right.

3 Q. You didn't call her back? You said --

4 A. No, I --

5 Q. You thought about it right then and there?

6 A. No, I called her back.

7 Q. Okay. That's what I'm getting at.

8 A. Yes.

9 Q. And you called her back and said this was
10 what, a two, a ten-second conversation, and said,
11 okay, I'll do it?

12 A. Then she said she'll --

13 Q. Yes? First of all, is that yes?

14 A. Yes.

15 Q. It was like a second ten-second
16 conversation?

17 A. Yes.

18 Q. And then she called you back for another
19 ten-second conversation that said, okay, I have set
20 it up for such-and-such a time, and I'll pick you
21 up?

22 A. Yes.

23 Q. Okay. And that was the extent of the
24 conversation, just basically a scheduling issue?

25 A. Correct.

11 (Pages 218 to 221)

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1 THE WITNESS: Could you restate that?
 2 BY MR. CRITTON:
 3 Q. Sure. You said before you went to
 4 Mr. Epstein's the first time, you learned or heard
 5 from [REDACTED] that she and Mr. Epstein had gotten into a
 6 disagreement, correct?
 7 A. Yes.
 8 Q. Okay. Did you ask her what the nature of
 9 the disagreement was? Because you wouldn't want to
 10 go to someplace where you might have a disagreement,
 11 right?
 12 A. Correct.
 13 Q. All right. And what did she say to you
 14 when you asked her?
 15 A. She said that it was in regards to her, her
 16 not getting paid.
 17 Q. She didn't get money or --
 18 A. Correct.
 19 Q. -- it was either she didn't get paid or
 20 didn't get the right amount?
 21 A. She didn't get -- that she wasn't going to get
 22 paid.
 23 Q. Okay. Did she tell you why she wasn't
 24 going to get paid?
 25 A. Something to do with a question that he had

Page 143

1 asked her, and she just -- I guess she didn't like it
 2 and they got into a little disagreement.
 3 Q. Okay. And did you, did you then think to
 4 yourself as, gee, you know, I could go over there,
 5 give a massage and not get paid because I could get
 6 into a disagreement like J.S. did, or did she make
 7 it out like it was really no big deal?
 8 A. She made it seem like it was not a big major
 9 concern.
 10 Q. Okay. And Jane Doe No. 4, what did Jane
 11 Doe No. 4 -- did she ever indicate that you should
 12 have any hesitation going over to Mr. Epstein's
 13 home?
 14 A. No.
 15 Q. All right. And Haley, did she ever
 16 indicate to you that you should hesitate to go over
 17 to Mr. Epstein's home?
 18 A. Not really, no.
 19 Q. Okay. So you had Jane Doe No. 4, Jane Doe
 20 No. 7, J.S. and Haley who all, at least from your
 21 perspective, led you to believe that your going to
 22 Mr. Epstein's home was not a problem, no big deal,
 23 safe, true?
 24 A. True.
 25 MR. MERMELSTEIN: Objection to form.

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1 BY MR. CRITTON:
 2 Q. Because if any of those four people, Haley
 3 Robson, Jane Doe No. 4, Jane Doe No. 7 or J.S. had
 4 said anything that would have caused you any
 5 concern, would it be a correct statement you, more
 6 likely than not, would not have gone?
 7 MR. MERMELSTEIN: Objection to form.
 8 THE WITNESS: Yeah.
 9 BY MR. CRITTON:
 10 Q. All right. Because they were friends of
 11 yours?
 12 A. Yes.
 13 Q. All right. And if something bad had
 14 happened or something inappropriate had happened, at
 15 least from their perspective you would have expected
 16 them to tell you that, wouldn't you?
 17 A. Yes, I did.
 18 Q. All right. And none of those four friends
 19 of yours told you anything or disclosed anything to
 20 you that caused you any concern; is that correct?
 21 A. Correct.
 22 Q. And if you felt that they had misled you
 23 in any way, you would have been angry with them,
 24 wouldn't you?
 25 A. Yes.

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1 Q. After you came back from Mr. Epstein's the
 2 first time, did you ever talk with Jane Doe No. 4,
 3 that is shortly after you were there the first time,
 4 about what had occurred?
 5 A. No.
 6 Q. All right. Did you ever suggest to her
 7 that she had in any way misled you or lied to you or
 8 deceived you --
 9 A. No.
 10 Q. -- about her experiences with Mr. Epstein?
 11 A. No.
 12 Q. Did you ever say anything within a short
 13 period -- and a short period could be a day, it
 14 could be a week, it could be a month, it could be
 15 six months. Did you ever talk with J.S. and tell
 16 her what had occurred at Mr. Epstein's?
 17 A. I don't remember.
 18 Q. Okay. Did you ever express anger with her
 19 or, or did you ever tell her that she had in some
 20 way deceived you or misled you?
 21 A. No.
 22 Q. Or lied to you?
 23 A. No.
 24 Q. Okay. Within a short period of time
 25 again, you know, a day to six months, did you ever

37 (Pages 142 to 145)

Page 222 1 Q. All right. You've never spoken with 2 Mr. Epstein or anyone who works on his behalf by 3 phone, have you? 4 A. No. 5 Q. Okay. Mr. Epstein or anyone on his behalf 6 has never texted you, have they? 7 A. No. 8 Q. Okay. Has anyone, has either Mr. Epstein 9 or anyone on his behalf corresponded with you or 10 communicated with you by way of e-mail or over the 11 computer? 12 A. No. 13 Q. Okay. Has Mr. Epstein or anyone on his 14 behalf ever communicated with you by text messages 15 or any other type of, you know, electronic 16 communication? 17 A. No. 18 Q. All right. So, all right. First time you 19 turned Haley down. Second time you said you'd think 20 about it. I think you told me in the interim you 21 had, you'd known -- you had known that Jane Doe No. 22 4 had been there. You knew Jane Doe No. 7 had been 23 there. You know J.S. had been there. And you knew 24 that Haley had been there, but you didn't know if 25 she had done anything, ever given a massage; is that	Page 224 1 Q. All right. Did you ever -- again, 2 before -- did Haley come to pick you up that day, 3 whatever the first day is you went to Mr. Epstein's 4 house? 5 A. She picked me up, yes. 6 Q. Okay. And when she picked you up, was it 7 in her car? 8 A. Yes. 9 Q. Do you remember what kind of car she had? 10 A. It was a truck. 11 Q. Okay. 12 A. A maroon truck. 13 Q. All right. And when she -- before you got 14 in the truck, did you look in and say -- well, let 15 me ask you this: What did you have on? What were 16 you wearing? 17 A. A skirt and a shirt. 18 Q. And under that you had your bra and your 19 boy shorts? 20 A. Yes. 21 Q. All right. And what did the skirt look 22 like? 23 A. Like a jean skirt. 24 Q. Short, long? 25 A. Yeah, fingertip length.
Page 223 1 correct? 2 A. Yes. 3 Q. All right. But you knew that J.S., Jane 4 Doe No. 7 had been there, and Jane Doe No. 4 had 5 been there, and none of them expressed to you, 6 either by outward signs that you saw or anything 7 verbally that would have caused you any concern; is 8 that a fair statement? 9 A. Yes. 10 Q. Okay. Before you got in the car -- okay, 11 so at some point you knew that Jeffrey was in -- 12 lived in Palm Beach. 13 A. Yes. 14 Q. Did you know that before you went? 15 A. That he lived in Palm Beach? 16 Q. Yes, ma'am. 17 A. Yes. 18 Q. All right. And you knew, did you know 19 anything about his age at that time? 20 A. No. 21 Q. Okay. Did you know, did you think he was 22 your age, or did you think he was older, or... 23 A. I don't know. 24 Q. You just -- okay. 25 A. I had no idea.	Page 225 1 Q. Okay. And your shirt? 2 A. I don't remember what shirt I was wearing. 3 Q. Like a tank top or a crop top, or was it 4 a -- 5 A. No, it was a, it was a regular shirt. 6 Q. Like a blouse -- 7 A. Yes. 8 Q. -- shirt? Before you got in the car, 9 Haley pulls up in her truck. Before you get in the 10 truck did you say, do I look okay? 11 A. No. 12 Q. Okay. Did Haley -- did you say is, you 13 know, I've thought about this, tell me a little bit 14 more about what I'm doing for 200 bucks? 15 A. No. 16 Q. Had you ever made 200 bucks for a 17 half-an-hour's work before? 18 A. No. 19 Q. Okay. Had anybody ever paid you \$200 for 20 doing an hour, a half hour or an hour or two-hours 21 worth of work? 22 A. Yes. 23 Q. Doing what? 24 A. Regrouting tables. 25 Q. Regrouting tables. Explain that for me.

12 (Pages 222 to 225)

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Page 18

1 Q. All I'm trying to do is, is it's your best
2 recollection that you remember when you went to
3 Mr. Epstein's house, approximately June of 2004,
4 because you got a used 2006 Toyota Corolla, correct?

5 A. I got a 2006 Toyota Corolla for my 16th
6 birthday.

7 Q. Okay. And you got that at what,
8 approximately three months after your 16th birthday?

9 A. I got it on my 16th birthday.

10 Q. At -- okay. And did you go and get your
11 driver's license on your 16th birthday or did you
12 have a learner's permit?

13 A. I had a learner's permit.

14 Q. So you could drive that car with someone
15 else?

16 A. Yes.

17 Q. And who gave you the car?

18 A. My mother.

19 Q. Okay. And any strings attached to it;
20 that is, did you have to pay the insurance? Did you
21 have to pay for the car? Did you have to make any
22 payments?

23 A. I paid \$1,000 down payment, and I paid for the
24 car.

25 Q. Okay. And what did your mom pay for it?

Page 19

1 She obviously -- she got you the car?

2 A. I put the \$1,000 down payment. She took care
3 of the rest.

4 Q. Oh, okay. So you put 1,000 and your mom
5 paid off for the, the remaining balance of the
6 vehicle, of the car?

7 A. Well, she bought it from the bank, so...

8 Q. All right, but she paid it?

9 A. Uh-huh.

10 Q. Yes?

11 A. Yes.

12 Q. All right. So, from your 16th birthday on
13 you were able to drive a car?

14 A. Yes.

15 Q. Okay. Let me go back then to the police
16 statement. The police statement that you gave in
17 the Epstein -- well, let me strike that.

18 You were at Mr. Epstein's home on,
19 you say approximately June of 2004. And I think you
20 went on how many additional occasions to his home?

21 A. I went a total of four times.

22 Q. And were they within a short period of
23 time, or were they over a length of time?

24 A. A length of time.

25 Q. And what -- for going the second time, do

Page 20

1 you recall what approximate date that was? Or if
2 you want to use approximately X-time after June of
3 '04, that's okay too.

4 A. I don't remember.

5 Q. How about the third time?

6 A. About close to Christmas.

7 Q. And what makes you recall that, that it --

8 A. Decorations.

9 Q. -- that it was close to Christmas?

10 A. Decorations.

11 Q. Okay. You mean, just decorations around
12 town or decorations -- that is, where did you see
13 decorations that makes you remember the third time
14 you were at his home?

15 A. On a gate.

16 Q. On his gate?

17 A. On a gate.

18 Q. On just a gate when you were going, headed
19 that way?

20 A. Yes.

21 Q. All right. And then the fourth time was
22 approximately when? Was it after Christmas?

23 A. Yes.

24 Q. Approximately how long after?

25 A. It was hot outside, maybe spring, summer.

Page 21

1 Q. And that would have been of '05?

2 A. Correct.

3 Q. So if -- of the four times that you went,
4 last being approximately spring/summer of '05 based
5 on your testimony, how much after that period or how
6 long a time period transpired before you spoke with
7 the police, or do you just not have any
8 recollection?

9 A. I don't remember.

10 Q. And you don't remember whether you spoke
11 to the police in '05 or '06 or '07; is that a
12 correct statement?

13 A. Correct.

14 Q. And I think part of my question was -- is,
15 you indicated I think you've seen the police
16 statement approximately two or three times?

17 A. Correct.

18 Q. Okay. Did you read the entire statement?

19 A. Yes.

20 Q. Okay. Did you see -- was anything, do you
21 know, if I use the word "redacted," do you know what
22 that means?

23 A. No, sir.

24 Q. Something's crossed out.

25 A. Yes, I saw that.

6 (Pages 18 to 21)

Page 174 1 BY MR. CRITTON: 2 Q. All right. Let me go back to J.L., okay. 3 At the time that Mr. Epstein, at least based on what 4 you testified earlier today, is because Mr. Epstein 5 did touch your breasts -- well, in fact, I should 6 probably clear up one thing. He only touched you in 7 the vaginal area, from what you've testified to 8 today, is over your boy shorts, correct? 9 A. Yes. 10 Q. And you have said that there was never any 11 penetration? 12 A. Correct. 13 Q. Okay. You never touched any of his 14 private parts, true? 15 A. Correct. 16 Q. Okay. You never had any kind of 17 intercourse? 18 A. No. 19 Q. All right. Never had oral sex? 20 A. No. 21 Q. He to you, you to him, correct? 22 A. No. 23 Q. Any type of other -- no type of sexual 24 contact whatsoever? 25 MR. MERMELSTEIN: Objection, form.	Page 176 1 THE WITNESS: Yes. 2 BY MR. CRITTON: 3 Q. Okay. And what kind of a friend, at least 4 with Jane Doe No. 2, what kind of a friend exposes 5 another good friend to a shocking, disturbing, 6 emotionally disturbing event? 7 MR. MERMELSTEIN: Form, argumentative, 8 rhetorical. 9 BY MR. CRITTON: 10 Q. Why did you do that? 11 A. I don't know. 12 Q. Okay. You also did that to J., J.L., 13 correct? 14 A. Yes. 15 Q. Okay. Why did you do that with J.L.? 16 A. I don't know. 17 MR. CRITTON: Let's go about ten more 18 minutes, and we'll take a break. Okay? 19 MR. MERMELSTEIN: All right. Is that 20 okay? 21 THE WITNESS: (Witness nods head.) 22 MR. MERMELSTEIN: Okay. 23 BY MR. CRITTON: 24 Q. Did you tell J.L. what had occurred? Did 25 you tell her what you had told Haley Robson?
Page 175 1 BY MR. CRITTON: 2 Q. That is, your, your sexual organ with one 3 of his sexual organs; that never occurred, correct? 4 A. You're asking me if I've had sex with him? 5 Q. No. None of your sexual organs ever came 6 in contact with his sexual organs, true? 7 A. Correct. 8 Q. All right. So, again, what -- based on 9 what you told Haley that he did touch your breasts, 10 and that you did take your shirt and your skirt off 11 but left on your bra and your boy shorts, that you 12 were in shock and emotionally disturbed at what 13 happened within -- at the time, and then you told 14 Haley within an hour how upset you were, you also 15 took Jane Doe No. 2 there, correct? 16 A. Yes. 17 Q. All right. And was Jane Doe No. 2 a good 18 friend of yours, then? 19 A. Yes. 20 Q. All right. So despite this, I'd say, 21 shocking incident to you, you were willing to expose 22 your friend Jane Doe No. 2 as well to, at least 23 based on your testimony, to this shocking, 24 disturbing experience that you had had, true? 25 MR. MERMELSTEIN: Form.	Page 177 1 A. Not exactly. 2 Q. But did you tell her she might be asked to 3 take off her clothes? 4 A. And that you don't have to, yes. 5 Q. All right. And you said you, you may be 6 asked to take off your clothes, but you don't have 7 to? 8 A. Yes. 9 Q. Okay. And did you say he might try to 10 touch you, but if he does, just tell him you're not 11 comfortable? 12 MR. MERMELSTEIN: Form. 13 THE WITNESS: Can you -- 14 BY MR. CRITTON: 15 Q. Yeah. Did you, did you tell her as well, 16 is if he tries to touch you, just tell him you don't 17 feel comfortable? 18 MR. MERMELSTEIN: Form. 19 THE WITNESS: I told her if he tries to do 20 anything, you can say no. 21 BY MR. CRITTON: 22 Q. Okay. And, and then he will stop? 23 A. Yes. 24 Q. Okay. And did you tell Jane Doe No. 2 the 25 same thing --

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1 Q. Haley's house?
2 A. Yes.
3 Q. Okay. And, and what did you do there?
4 A. Get ready to go out or do something. I don't
5 remember.
6 Q. Did you go out that night?
7 A. We did. I don't know.
8 Q. Did something?
9 A. I don't remember. We did something. I don't
10 remember.
11 Q. The three of you did something?
12 A. We did something.
13 Q. Okay. Do you remember what you did with
14 the money?
15 A. No.
16 Q. Okay. Did you buy anything, or you just
17 don't remember one way or the other?
18 A. I bought a beer.
19 Q. All right. Usually beers aren't 200
20 bucks.
21 A. Right.
22 Q. Especially in -- all right. And you don't
23 remember what you did with the rest of the money?
24 A. No.
25 Q. The, the next time you went, I think you

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1 said, was the next time you went around the
2 Christmastime date, or did you go the second time
3 before Christmas?
4 A. Maybe around -- I don't know. I don't
5 remember.
6 Q. And do you remember who, how it was that
7 you went the second time?
8 A. I don't remember.
9 Q. Okay. Do you remember who you went with
10 the second time?
11 A. I believe it was with Jane Doe No. 2.
12 Q. Okay. Jane Doe No. 2?
13 A. Yes.
14 Q. So your recollection is you went with Jane
15 Doe No. 2 the second time, just the two of you?
16 A. Yes.
17 Q. Okay. Did Jane Doe No. 4 go with you the
18 second time?
19 A. I don't remember.
20 Q. Did, did Jane Doe No. 4 ever go with you
21 again?
22 A. Yes.
23 Q. Okay. When did she go with you again?
24 A. When I took her.
25 Q. So your recollection is that she, she was

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1 there the first time, but you don't recall seeing
2 her either the second or the third time but only the
3 fourth time when you took her?
4 A. Correct.
5 Q. And when you took Jane Doe No. 2 the
6 second time, you already described for me, so I
7 won't belabor it as to say what your conversation
8 was with both Jane Doe No. 2 and as well J.L.
9 Remember we talked about that a little earlier?
10 A. Yes.
11 THE VIDEOGRAPHER: Sir, you're covering
12 your microphone.
13 BY MR. CRITTON:
14 Q. We talked about that earlier, correct?
15 A. Yes.
16 Q. Okay. So when you, when you took Jane Doe
17 No. 2 the second time, did you pick her up?
18 A. Yes.
19 Q. And did you pick her up in your 2006
20 Toyota Corolla?
21 MR. MERMELSTEIN: Objection to form.
22 THE WITNESS: I picked her up in my car,
23 yes.
24 BY MR. CRITTON:
25 Q. Which was the 2006 Toyota Corolla?

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1 MR. MERMELSTEIN: Form.
2 THE WITNESS: Or I don't know what year it
3 was. I don't remember.
4 BY MR. CRITTON:
5 Q. I'm just -- I'm telling you what -- I'm
6 repeating back what you told me earlier today.
7 A. Well, I think I'm going to correct you. I
8 think it was an older model, model than that.
9 Q. Okay. So, anyhow, you picked her up in
10 your car?
11 A. Yep.
12 Q. And when you got in the car did you say,
13 did you say anything else to her other than what you
14 told early, told me earlier that you said to both
15 Jane Doe No. 2 and to J.L. about him maybe asking
16 you to take your clothes off, him asking you that he
17 may try to touch you, and do what you feel
18 comfortable with?
19 A. That you're not allowed to talk to him.
20 Q. Okay. Anything else?
21 A. Not that I remember, no.
22 Q. Okay. And when you got over there, how,
23 how were the arrangements made for you to bring Jane
24 Doe No. 2 over there?
25 A. Haley set it up.

21 (Pages 258 to 261)

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Page 262	Page 264
1 Q. Well, Haley set it up? 2 A. Yes. 3 Q. Okay. But you're sure she didn't go with 4 you? 5 A. I believe so. 6 Q. You don't believe? 7 A. I do believe so. 8 Q. You, you believe she did not go? 9 A. Correct. 10 Q. Okay. So, so you get over there. You 11 drive over to the same location. Did you remember 12 how to get there, or did you have to get directions? 13 A. I don't remember. 14 Q. And when you got over there -- but somehow 15 you got over there. And did you go in the same 16 entrance again? 17 A. Yes. 18 Q. Okay. And when you were there, what did 19 you do? That is, you parked your car. Did you pull 20 into the driveway? 21 A. Yes. 22 Q. Did you go in the side door again? 23 A. The kitchen. 24 Q. The kitchen. And when you get into the 25 kitchen, who was there on this occasion?	1 Q. Did she at any time say to you, you know, 2 I don't think I really want to do this? 3 A. No. 4 Q. Okay. Did you ever discourage her from 5 doing it? 6 A. Not that I remember. 7 Q. Okay. I think you already told me earlier 8 is despite the fact that you were shocked, were 9 emotionally disturbed, that you thought it was a 10 terrible experience, you still took Jane Doe No. 2? 11 A. Yes. 12 MR. MERMELSTEIN: Objection, asked and 13 answered numerous times. 14 BY MR. CRITTON: 15 Q. So, you go up -- so she goes upstairs. 16 How long was she upstairs? 17 A. I don't know. 18 Q. What did you do when you were downstairs? 19 A. Hang out in the kitchen. 20 Q. Did you have anything to eat, drink? 21 A. No. 22 Q. Just hung in the kitchen? 23 A. (Witness nods head.) 24 Q. All right. 25 THE COURT REPORTER: That's a yes?
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1 A. The chef. 2 Q. Anyone else? 3 A. The housekeeper. 4 Q. Okay. Do you remember what her name was? 5 A. I was never -- 6 Q. He or she, was it a he or she? 7 A. It was a her. 8 Q. All right. And what happened, then? 9 A. I got let in the house. We went into the 10 house. 11 Q. Who went upstairs with Jane Doe No. 2? 12 A. I don't remember. 13 Q. Did you go? 14 A. No. 15 Q. Okay. Because you never went up again? 16 A. Right. 17 Q. Did you ever see Mr. Epstein again at his 18 house? 19 A. Yes. 20 Q. Okay. But not that occasion? 21 A. Correct. 22 Q. So somehow Jane Doe No. 2 got upstairs? 23 A. (Witness nods head.) 24 Q. Yes? 25 A. Yes, I don't --	1 THE WITNESS: Yes, sorry. 2 BY MR. CRITTON: 3 Q. Okay. Anything else happen? Anything 4 else unusual, usual, or you just hung in the 5 kitchen; you waited for her to come back? 6 A. Correct. 7 Q. Okay. And she comes back downstairs? 8 A. Yes. 9 Q. And do you leave? 10 A. Yes. 11 Q. Okay. Did you see anyone else? 12 A. Not that I remember. 13 Q. Okay. So you get back in your car and 14 where did you two go? 15 Well, in fact, before that is, did you 16 receive any money for bringing, having brought Jane 17 Doe No. 2 there on the second occasion? 18 A. Yes. 19 Q. And who gave you the money? 20 A. I don't remember who gave it to me. 21 Q. Do you know how you got the money? Was it 22 handed to you? Did you get it when you were there? 23 Did you -- 24 A. I don't remember. 25 Q. So, but how much did you get?

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1 A. A hundred. 2 Q. Did Jane Doe No. 2 know that you had 3 received money for taking her there? 4 A. Yes. 5 Q. Because you told her? 6 A. Yes. 7 Q. You got back in the car. Did Jane Doe No. 8 2 say anything to you? 9 A. Not that I remember. 10 Q. All right. And so you drove where? Where 11 did you go after that? 12 A. I don't remember. 13 Q. Did you go back to anybody's house? Did 14 you go out that night, or do you have any 15 recollection? 16 A. I do not remember what we did after. 17 Q. All right. The, the third time you went, 18 you took who, J.L.? 19 A. Yes. 20 Q. All right. And did anyone go with you on 21 that occasion? 22 A. No, I went by myself. 23 Q. Okay. You're sure neither Haley nor, 24 excuse me, Jane Doe No. 4 went with you? 25 A. Yes, I'm sure.	1 the cook? 2 A. I don't remember. 3 Q. Do you know whether it was the same cook? 4 A. No. 5 Q. So you both go into the kitchen. Other 6 than the cook, was anybody else there? This is now 7 the third visit. 8 A. No. 9 Q. So, how did J.L. get upstairs to give the 10 massage? 11 A. I don't remember who took her up. 12 Q. You don't remember seeing anybody else 13 other than the cook, though, at least before she 14 went upstairs, correct? 15 A. Correct. 16 Q. All right. And I think, again, so as not 17 to repeat it, what you told me earlier about Ms.-- 18 taking J.L. and what you told Jane Doe No. 2, that 19 would apply to what you had told her going, up until 20 the time she went upstairs, correct? 21 A. I'm confused on what you're saying. 22 Q. Well, we talked -- I don't want to have to 23 repeat because Stuart will object as I'm being 24 repetitious, so when we talked about what you had 25 told J.L. --
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1 Q. And how did you make arrangements to take 2 your -- one of your best friends, J.L., there? 3 A. Haley. 4 Q. All right. And when you, did you 5 basically follow the same procedure you had with 6 Jane Doe No. 2; that is, you drove to the house. 7 You went in the kitchen? 8 A. Yes. 9 Q. Okay. Was anybody there at that time in 10 the kitchen? 11 A. No. 12 Q. Okay. So you're in the house. How did 13 you get in the door or was it open? 14 A. No. Some -- the, the chef was always there. 15 Q. All right. So the chef's in the kitchen. 16 Did he open the door for you? 17 A. Yes. 18 Q. Okay. So the two of you come in? 19 A. Yes. 20 Q. All right. And do you remember what J.L. 21 had on? 22 A. No. 23 Q. Okay. Do you remember what you had on? 24 A. No. 25 Q. So, you sit in, you -- did you recognize	1 A. Oh, yes. 2 Q. -- about everything, you know, what to -- 3 what to, in essence, what to expect, you, you, I 4 don't need to repeat that -- 5 A. Yes. 6 Q. -- correct? 7 A. Yes. 8 Q. All right. And did you tell, did you tell 9 either of them if you're asked your age to tell them 10 you're 19? 11 A. No. 12 Q. Had you told either one of them then? 13 A. No. 14 Q. All right. Do you know how old Jane Doe 15 No. 2 was at the time you took her? 16 A. No. 17 Q. Do you know how old J.L. was when you took 18 her? 19 A. No. 20 Q. Were they approximate -- were they in your 21 age, in your class at school? And I think you said 22 Jane Doe No. 2 was. 23 A. Jane Doe No. 2 was, yes. 24 Q. Was J.L. older? 25 A. Yes.

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EXAMINATION DIRECT CROSS REDIRECT

JANE DOE NO. 3

BY MR. CRITTON 4

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PROCEEDINGS

Deposition taken before Cynthia Hopkins,
Registered Professional Reporter, Florida
Professional Reporter, and Notary Public in and for
the State of Florida at Large, in the above cause.

THE VIDEOGRAPHER: This is the 19th day of
February, 2010. The time is 10:07 a.m. This
is the videotaped deposition of Jane Doe No. 3
in the matter of Jane Doe No. 2 versus Epstein.
This deposition is being held at 250
Australian Avenue South, West Palm Beach,
Florida. My name is Sascha Quimby. I am the
videographer representing Visual Evidence, Inc.
Will the attorneys please announce their
appearances for the record.
MR. MERMELSTEIN: Stuart Mermelstein for
Plaintiff, Jane Doe 3.
MR. CRITTON: Bob Critton on behalf of
Jeffrey Epstein.
Thereupon,
(JANE DOE NO. 3)
having been first duly sworn or affirmed, was
examined and testified as follows:

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THE WITNESS: Yes.

DIRECT EXAMINATION

BY MR. CRITTON:

Q. Would you please tell me your full name.

A. Jane Doe No. 3.

Q. Give me your date of birth, please.

A. March 5th, 1988.

Q. And do you know your Social Security
number?

A. [REDACTED]

Q. Ms. Jane Doe No. 3, have you ever had your
deposition taken before?

A. Yes.

Q. When?

A. From the police department.

Q. That was a sworn statement?

A. Okay. So then, no.

Q. Was there a court reporter there that took
it or was it --

A. No.

Q. In what fashion did you give a sworn
statement to the police department?

A. Explain further.

Q. What were the circumstances of your giving
a sworn statement?

2 (Pages 2 to 5)