

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,

Plaintiff,

-vs-

VOLUME I OF III

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

VIDEO-CONFERENCED AND VIDEOTAPED DEPOSITION OF
JANE DOE NO. 4

Tuesday, October 27, 2009
11:11 - 6:05 p.m.

250 Australian Avenue South
Suite 115
West Palm Beach, Florida 33401

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

EXHIBIT B

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1 Q. -- this number of times. All you're doing
2 is you're guessing now about how often you think you
3 went --
4 MR. HOROWITZ: Object --
5 BY MR. LUTTIER:
6 Q. -- isn't that right?
7 MR. HOROWITZ: Object to the form.
8 BY MR. LUTTIER:
9 Q. Correct?
10 A. No, I am not guessing.
11 Q. Well, you don't even know when Mr. Epstein
12 was in town, do you?
13 MR. HOROWITZ: Object to the form.
14 THE WITNESS: When he was in town he would
15 call me.
16 BY MR. LUTTIER:
17 Q. Tell me in the year 2004 when he was in
18 town.
19 A. Tell -- how, like, what do you mean?
20 Q. Was he there in January of 2004?
21 A. I am sure.
22 Q. How do you know that?
23 A. Because I went there. I'm sure. I
24 don't --
25 Q. You don't know if you went there in

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1 January of '04, do you?
2 A. (No verbal response.)
3 Q. You don't know, do you?
4 A. I know I went --
5 Q. You don't know if you went there --
6 A. -- approximate dates, no, I don't know.
7 MR. HOROWITZ: Hold on. Now you're
8 interrupting her.
9 BY MR. HOROWITZ:
10 Q. Okay. You don't know if you went to see
11 him --
12 A. I don't know approximate dates, I'm sorry.
13 Q. Was he there in Jan -- in February of
14 2004?
15 A. I don't know.
16 Q. Was he there in March of 2004?
17 A. No, I don't know.
18 Q. Was he there in April of 2004?
19 A. I don't know.
20 Q. Was he there in May of 2004?
21 A. I don't know.
22 Q. Was he there in June of 2004?
23 A. I don't know.
24 Q. Was he there in July of 2004?
25 A. I don't know.

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1 Q. Was he there in August of 2004?
2 A. I don't know.
3 Q. Was he there in September of 2004?
4 A. I don't know.
5 Q. Was he there in October of 2004?
6 A. I don't know.
7 Q. Was he there in November of 2004?
8 A. I don't know.
9 Q. Was he there in December of 2004?
10 A. I don't know.
11 Q. Was he there in January of 2005?
12 A. I don't know.
13 Q. Was he there in February of 2005?
14 A. I don't know.
15 Q. Was he there in March of 2005?
16 A. I don't know.
17 Q. Was he there in April of 2005?
18 A. I don't know.
19 Q. Was he there in May of 2005?
20 A. I don't know.
21 Q. The fact of the matter is you don't know
22 when Mr. Epstein was in town, do you?
23 MR. HOROWITZ: Object to the form.
24 THE WITNESS: I don't have exact dates,
25 no.

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1 BY MR. LUTTIER:
2 Q. Did you ever personally call Mr. Epstein
3 on the phone?
4 A. I know I think I have his personal number.
5 I had Sarah's personal number I think.
6 Q. Wasn't my question.
7 MR. HOROWITZ: You keep doing it. You
8 keep interrupting.
9 BY MR. LUTTIER:
10 Q. Did you ever personally call Mr. Epstein
11 on the phone? When I say call, talk to him
12 personally on the phone.
13 A. Talk to him on the phone? Yes.
14 Q. When?
15 A. When I found out that the cops were
16 investigating girls.
17 Q. And when was that?
18 A. Probably like, probably sometime, June or
19 August -- September, October.
20 Q. Of '05?
21 A. Yeah. No. Yeah. Wait --
22 Q. And how did you find out --
23 A. -- it's '05, '06, I think. Wait, yeah.
24 Q. And how did you find out the cops were
25 investigating?

26 (Pages 98 to 101)

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1 with the FBI. Did you have another meeting with the
2 FBI?

3 A. No, not that I remember, no.

4 Q. Did you talk to anybody from the United
5 States Attorney's office?

6 MR. HOROWITZ: Form.

7 THE WITNESS: What do you mean, the United
8 States Attorney's?

9 BY MR. LUTTIER:

10 Q. A lawyer representing the government.

11 A. Like for the FBI? Like a lawyer for the
12 FBI?

13 Q. It could be anybody. The U.S. Attorney's
14 office is just an office of government lawyers that
15 represent the government. It could represent an
16 agency or anything else. This Maria Villafana is, I
17 believe, the person that was heading it up, but
18 there might have been somebody else from that
19 agency.

20 A. I think I might have called somebody to
21 talk to them because I didn't -- I was confused. I
22 didn't know anything that was going on. But I don't
23 think, I don't like -- I don't know who -- what her
24 name was. I don't know --

25 Q. Did anyone from any of those agencies, the

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1 FBI or anybody else that you talked to, explain to
2 you anything about what was going on?

3 A. No.

4 Q. You didn't have any idea why they were
5 talking to you or what was going on?

6 A. No. They, they said that I can tell them
7 what happened.

8 Q. Did you say you called Jeff Epstein to let
9 him know that the -- that somebody was --

10 A. Yeah.

11 Q. -- asking questions? And did you call him
12 before or after the Palm Beach Police came?

13 A. Before the Palm Beach Police came and
14 talked to me.

15 Q. And, and what did you tell him?

16 A. I told him, I said girls are being --
17 police are going to the girls that have been going
18 to the house, just to let him aware of what was
19 going on. I don't remember the exact conversation.
20 I just remember letting him know, like, did you know
21 that there was cops interviewing girls that have
22 been going to the house.

23 Q. And, and that conversation happens
24 sometime after the Palm Beach Police meet you?

25 A. No, that was before.

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1 Q. Or right before that?

2 A. It was before.

3 Q. But while you were at Lynn?

4 A. It was while I was at Lynn. It was before
5 the cops came because I didn't know -- I heard about
6 them going to all these girls and I was at school.
7 I didn't know what was going on.

8 Q. Other than that conversation with
9 Mr. Epstein, have you ever had any other phone
10 conversation directly with Mr. Epstein?

11 A. After that?

12 Q. At any time, right up until today.

13 A. No, I think he rented me a vehicle.

14 Q. No. I am going to have to ask about phone
15 conversations.

16 A. Yeah, I think so. About the vehicle that
17 he rented me.

18 Q. You had a conversation with Mr. Epstein
19 directly?

20 A. Sarah or Mr. Epstein, it was one of them.

21 Q. So you're not sure?

22 A. No, I'm not sure.

23 Q. But you are sure you had one conversation
24 with Mr. Epstein sometime while you were a freshman
25 at Lynn University about the police asking

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1 questions?

2 A. Yeah, because I talked to him before I got
3 interviewed.

4 Q. Okay. Other than the possibility of --

5 A. Oh, and then, I think I talked to him
6 again after I got interviewed by the cops because he
7 had me meet with one of his lawyers to go over the
8 questions that the cops had asked me, and --

9 Q. Okay. Do you know whether it was a lawyer
10 that you met with?

11 A. Yeah, it was, I, I have his business -- I
12 don't have it on me right now, but it was one of
13 his -- some older guy, like I could like show you a
14 -- show me a picture and I could point him out.

15 Q. Did you tell that person the truth?

16 A. I told him everything that I -- he asked
17 me everything that I had gone -- that the cops had
18 asked me and all my questions to what the cops --
19 all my answers to what the cops had asked me, like
20 they wanted to know everything that the cops were
21 asking me and what my answers were to them, just
22 about what the cops were asking me.

23 Q. Okay. So, did you tell him the truth?

24 A. Yeah, I told him -- well, it was, I think
25 the day after or two days or a week after I had

31 (Pages 118 to 121)

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1 talked to the cops, I talked to him. So it was
2 fresh in my memory, so I told him everything that I
3 had told the cops.

4 Q. As a matter of fact, at the time that
5 the -- well, strike that.

6 Was Mr. Epstein good to you?

7 MR. HOROWITZ: Object to the form.

8 BY MR. LUTTIER:

9 Q. Was Mr. Epstein good to you?

10 A. Yeah.

11 Q. Okay. I mean, didn't he -- did he give
12 you some gifts?

13 A. Yeah.

14 Q. What kind of gifts did he give you?

15 A. Well, he rented me a car.

16 Q. Okay.

17 A. Rented me a car and bought me lingerie
18 from Victoria Secret, bought me a vibrator. What
19 else? Like, gave me like a brush. It was a
20 vibrating brush. I mean, it was pretty much it.
21 Offered me to go like out of the, offered me to
22 travel.

23 Q. Did you ever travel with Mr. Epstein?

24 A. I was not old enough to travel.

25 Q. Did you ever see Mr. Epstein -- when I say

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1 "see" I mean have one of these massages that you
2 gave Mr. Epstein -- any place other than his house
3 in Palm Beach?

4 A. No.

5 Q. All right. Other than the phone
6 conversation you had with Mr. Epstein after -- or
7 when the police were about to interview you, and a
8 conversation you may have had about renting a car,
9 have you ever had any other direct phone
10 conversation with Mr. Epstein?

11 A. Can you ask that question one more time?

12 Q. Other than the phone conversation you had
13 with Mr. Epstein wherein you told him that the
14 police were asking questions, and the possibility
15 that you may have spoken with either him or Sarah
16 about renting a car, have you had any other phone
17 conversation with Mr. Epstein directly?

18 A. No, no.

19 Q. Have you -- and you say you've never
20 performed a massage on Mr. Epstein or any other act
21 physically with him other than at his house in Palm
22 Beach?

23 A. Yeah, just at the house in Palm Beach.

24 Q. Okay. And by the way, are you a person
25 that's, are you proficient with computers?

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1 A. Am I good with computers?

2 Q. Yeah. Do you use the computer?

3 A. Yeah, I use the computer.

4 Q. Do you have any social web site that you
5 have for yourself?

6 A. Yeah, Facebook.

7 Q. Okay. Do you have anything besides
8 Facebook?

9 A. My e-mail account, Yahoo.

10 Q. And what's your Facebook address?

11 A. Jane Doe No. 4@pop.student.lynn.edu.

12 Q. And on your Facebook, is it still up
13 today?

14 A. Uh-huh.

15 Q. Have you deleted anything from your
16 Facebook about discussions concerning Mr. Epstein?

17 A. I don't even know if I ever -- I don't
18 think I've ever put any discussions up that's
19 regarding Mr. Epstein.

20 Q. Have you ever communicated with
21 Mr. Epstein via the computer?

22 A. No.

23 Q. That would be e-mail, or --

24 A. Yeah, no.

25 Q. -- however else they do it these days.

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1 Texting, do you ever text Mr. Epstein?

2 A. (Witness shakes head.)

3 MR. HOROWITZ: You have to answer --

4 THE WITNESS: No.

5 MR. HOROWITZ: -- instead of shaking your
6 head, no.

7 THE WITNESS: I said, no.

8 BY MR. LUTTIER:

9 Q. Have you in the last, since 2004, have you
10 gone to the City of Chicago, Illinois?

11 A. Yeah.

12 Q. When did you go to Chicago?

13 A. My junior, junior year.

14 Q. Junior year of what?

15 A. My summer, junior going into my senior
16 year, that summer.

17 Q. Of what, of Lynn University?

18 A. Yeah.

19 Q. So junior --

20 A. Of '0 -- what is it, '0 -- sorry, I can't
21 give you an accurate date. Summer, '06, '08, '09,
22 so, yeah, '08.

23 Q. If '05 was your freshman year.

24 A. Yeah, so it was my junior year.

25 Q. And '06 would have been your sophomore

32 (Pages 122 to 125)

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1 agree with it, and we'll proceed.
 2 MR. LUTTIER: Ready?
 3 THE COURT REPORTER: Yes.
 4 MR. LUTTIER: Please state your name. Oh,
 5 you have to swear her in.
 6 Thereupon,
 7 (JANE DOE NO. 4)
 8 Having been first duly sworn or affirmed, was
 9 examined and testified as follows:
 10 THE WITNESS: Yes.
 11 DIRECT EXAMINATION
 12 BY MR. LUTTIER:
 13 Q. What is your name, ma'am?
 14 A. Jane Doe No. 4.
 15 Q. And how do you spell your middle name?
 16 A. (Witness spells middle name.)
 17 Q. And your last name is -- (Mr. Luttier
 18 spelled the witness's last name.)
 19 A. Yes.
 20 Q. Okay. Jane Doe No. 4, when were you born?
 21 A. June 6, 1987.
 22 MR. WILLITS: I can barely hear the
 23 witness. Can we get it a little closer to her?
 24 MR. HOROWITZ: Yes.
 25

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1 BY MR. LUTTIER:
 2 Q. Have you ever been known by any other
 3 name?
 4 A. No.
 5 Q. Have you ever been deposed before?
 6 A. Deposed?
 7 Q. That is have your deposition taken as
 8 we're doing today.
 9 A. No.
 10 Q. Have you ever given anybody any kind of
 11 statement under oath before?
 12 A. The police reports, you mean?
 13 Q. Could be, yeah.
 14 A. Yeah.
 15 Q. All right. Do you know what the
 16 significance of an oath is?
 17 A. Yeah, where you tell the truth.
 18 Q. Okay. You understand you are under oath
 19 today?
 20 A. Yes.
 21 Q. Do you know what the significance of
 22 violating an oath is?
 23 A. (Witness shakes head.)
 24 Q. Like, if you don't tell the truth when
 25 you're under oath, do you know --

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1 A. Yeah, you're in trouble.
 2 Q. Okay. You know that's against the law to
 3 do that?
 4 A. Yeah.
 5 Q. All right. And you know there are
 6 criminal sanctions associated with --
 7 A. Yes.
 8 Q. -- lying under oath? And have you been,
 9 have you been taught at any time in your lifetime
 10 the importance of telling the truth?
 11 A. Yeah.
 12 Q. And when do you recall first being taught
 13 the importance of telling the truth?
 14 A. Ever since I was a little girl, my parents
 15 taught me.
 16 Q. Okay. And have -- to the best of your
 17 knowledge have you always told the truth when you
 18 are under oath?
 19 A. Yeah. Well, when I was -- well, certain
 20 times, yeah, when I was scared, I didn't know what
 21 to do. I mean, yeah, I mean like under an
 22 interview, like what are you trying to --
 23 Q. Have you always told the truth when you've
 24 been under oath? That's my question to you.
 25 A. Like as if today?

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1 Q. As of from the day you were born until
 2 today as you sit here now.
 3 A. Yeah.
 4 Q. What was your answer?
 5 A. Yeah.
 6 Q. All right. So at any point in time that
 7 you ever told anybody --
 8 A. Under oath, is that like when police ask
 9 you a question; is that being under oath?
 10 Q. I mean when somebody --
 11 A. Because I don't think I've -- I don't
 12 think I've ever been under oath like -- besides like
 13 this moment.
 14 Q. I think when somebody asks you and tells
 15 you that you are giving a sworn statement.
 16 A. I guess like if I were --
 17 MR. HOROWITZ: Are you testifying? Let me
 18 object to the form.
 19 MR. LUTTIER: My question stands.
 20 MR. HOROWITZ: Object to the form.
 21 THE WITNESS: Like, if you write a, like,
 22 pre-statement or something like that?
 23 BY MR. LUTTIER:
 24 Q. No. If someone says to you, or asks you,
 25 is everything that you say true and correct.

3 (Pages 6 to 9)