

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. 5

Friday, February 26, 2010
8:07 - 3:44 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.: 1312

EXHIBIT *B*

Case No. 01

Page 178 1 lot with Andy. They both denied it. And at first I 2 believed them, but then I had more people telling me 3 that it was true. So I don't remember how this 4 happened, but she ended up moving to Fort Lauderdale 5 when, you know, I had enough people telling me that they 6 actually did have sex, and I lost it on her, and she 7 still denied it when she moved away. But after that I 8 don't, I don't recall her ever -- me and her ever 9 talking about it and admitting it. 10 Q. Okay. What -- when did you first meet 11 K.M.? 12 A. Oh, K.M. That was middle school. I met her 13 at Wellington Landings I think my middle school was 14 called in Wellington, when I moved with my father. But 15 I wasn't friends with her in middle school. I just knew 16 of her. 17 Q. When did you become friends with her? 18 A. My freshman or sophomore year. I think it was 19 my freshman. 20 Q. And when did you first learn that she had 21 been to Mr. Epstein's? 22 A. She actually went with D.D., and I went with 23 D.D. in the car with them. That's the only time that I 24 know of. 25 Q. Okay. Let's talk about that. When did it	Page 180 1 Q. Now, this is an event that happened over 2 six years ago? 3 A. Yeah, my sophomore year. 4 Q. Would you agree with me that your memory 5 about that event now is not precise? 6 MR. MERMELSTEIN: Form. 7 THE WITNESS: I remember pretty much what 8 happened. 9 BY MR. LUTTIER: 10 Q. That's not my question. Would you agree 11 with me that your memory about the incidents that 12 happened in '03, specifically with respect to 13 Mr. Epstein, is not precise? 14 MR. MERMELSTEIN: Form. 15 THE WITNESS: As in exactly what happened? 16 BY MR. LUTTIER: 17 Q. Yes. 18 A. I remember pretty much what happened, yes. 19 Q. Can you say with absolute certainty 20 everything that happened? 21 MR. MERMELSTEIN: Form. 22 THE WITNESS: Every little, little detail, 23 probably not. But everything that I remember, 24 you know, I remember pretty much everything 25 that -- I mean, I know it's confusing. I'm
Page 179 1 occur, in terms of time, when you and D.D. and K.M. 2 went to Mr. Epstein's? 3 A. Well, D.D. and I went first. Do you want to 4 know about the instance with K.M.? 5 MR. MERMELSTEIN: That's what he asked 6 you. 7 MR. LUTTIER: Yeah. 8 THE WITNESS: Okay. The time frame? 9 BY MR. LUTTIER: 10 Q. Yeah. 11 A. It was sophomore year. I was with D.D. and 12 K.M. and they wanted to go to the house, and I was in 13 the car with them. 14 Q. Okay. How, how were you able to identify 15 it was your sophomore year? 16 A. Because when I went, it was when my father 17 lived in Binks Forest, and I lived in Binks Forest for 18 my freshman and my sophomore year. 19 Q. Do you have any record which reflects when 20 you went to Mr. Epstein's house? 21 A. No. 22 Q. Do you know of the existence of any notes 23 that you kept or calendars or anything like that 24 where you recorded the information? 25 A. No.	Page 181 1 sure there's little things that I don't 2 remember, but I remember the majority of what 3 happened. 4 BY MR. LUTTIER: 5 Q. Well, you, you remember I asked you about 6 Dr. Kliman earlier? 7 A. Yes. 8 Q. You told me you told Dr. Kliman the truth? 9 A. Yes. 10 Q. Whatever you told Dr. Kliman was the truth 11 when you said it? 12 A. Yes. 13 Q. You told Dr. Kliman yourself that you 14 couldn't remember a bunch of specifics about your 15 visits with Dr. -- I mean, with Mr. Epstein, didn't 16 you? 17 MR. MERMELSTEIN: Form. 18 THE WITNESS: Which hand he used and 19 things like that; I don't remember specifics 20 like that. 21 BY MR. LUTTIER: 22 Q. Do you remember telling Dr. Kliman that 23 your recollection about what happened wasn't clear? 24 MR. MERMELSTEIN: Form. 25 THE WITNESS: Did he say it in a different

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1 A. Just that we can't believe what just happened
2 to us.

3 Q. No. Let me -- I want do this in, in
4 steps. Do you have a specific recollection of your
5 conversation with D.D.?

6 A. Parts of it, yes.

7 Q. Okay. Are there parts of it you don't
8 have a specific recollection about?

9 A. Yes.

10 Q. All right. So then you acknowledge there
11 were some things that you don't remember about your,
12 the events that transpired at Mr. Epstein's; is that
13 correct?

14 MR. MERMELSTEIN: Objection. You're prior
15 question was just about her conversation.

16 MR. LUTTIER: Okay. Wait a minute.
17 Don't, don't speak.

18 BY MR. LUTTIER:

19 Q. We'll take it in two steps. There are,
20 there are sub-portions of the conversations you had
21 with D.D. immediately after going to Mr. Epstein's
22 house with her that you don't recall; is that
23 correct?

24 A. As of right now, yes.

25 Q. All right. Would you agree with me

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1 there's also events that occurred when you and D.D.
2 went to see Mr. Epstein that you don't recall?

3 MR. MERMELSTEIN: Form, overbroad.

4 THE WITNESS: Today?

5 BY MR. LUTTIER:

6 Q. Yes.

7 A. Yes.

8 Q. All right. All right. So what's your
9 best recollection of your discussion with D.D. when
10 you and she went to Mr. Epstein's?

11 A. The story of what happened?

12 Q. Well, if you want us to -- let's just
13 start -- let me, let me back it up.

14 There came a point in time that you
15 heard something about somebody named Mr. Epstein; is
16 that right?

17 A. Correct.

18 Q. When did you first hear of Mr. Epstein?

19 A. It was in high school.

20 Q. When in high school?

21 A. I'm going to say my sophomore year.

22 Q. Okay. When in your sophomore year?

23 A. I'm approximating because I don't know the
24 exact date, but probably in the beginning.

25 Q. Okay. "Beginning" meaning in the first

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1 part of the year?

2 A. Yes.

3 Q. Year starts -- your sophomore year would
4 have started in approximately August of '02?

5 A. Yes.

6 Q. And it concluded in approximately June of
7 '03?

8 A. It ended?

9 Q. Yeah.

10 A. Yes.

11 Q. Okay. So your best recollection is you
12 first heard of Mr. Epstein's name sometime between
13 August of '02 and October of '02. You said it was
14 the beginning of the year.

15 A. Yeah. I mean, yeah.

16 Q. Let me make sure I'm clear. I'm not
17 trying to put a date in your memory.

18 When you said -- we've identified
19 that your sophomore year started in August of '02
20 and ended in June of '03, right?

21 A. Yes.

22 Q. Okay. So when you said you first heard of
23 Epstein's name in the beginning of your sophomore
24 year --

25 A. Yes.

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1 Q. -- that would be sometime after August of
2 '02?

3 A. Yes.

4 Q. And when you said the beginning, what do
5 you mean, August, September, October, or...

6 A. I don't know which month. It was in the
7 beginning of the school year.

8 Q. Within the first couple months?

9 A. Probably.

10 Q. So August or September would be a fair
11 estimate?

12 A. Yes, I mean, I had, yes.

13 Q. Okay. So August or September of '02, what
14 is it you first hear about Mr. Epstein?

15 A. I don't know exactly what I heard. I just
16 heard something about, if you go to this man, Jeffrey
17 Epstein's house, and you give him a body massage, you
18 get \$200.

19 Q. And in this first occasion that you heard
20 about it, was -- did Mr. Epstein's name come up, or
21 were you just told, if you go to somebody's house
22 someplace you can get some money?

23 A. It was probably somebody's place; it wasn't
24 his specific name probably.

25 Q. Before you first went to Mr. Epstein's

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1 house for the first time, did you know his name?
 2 A. Before -- yes, before I went to his house.
 3 Q. So, at some point before you went there
 4 for the first time, you knew that you were going to
 5 go see somebody named Jeffrey Epstein.
 6 A. Correct.
 7 Q. Do you recall when it was you first heard
 8 his name?
 9 A. No, I don't recall that.
 10 Q. Do you know if, if you heard his name in
 11 the first conversation about making some money doing
 12 a massage, or was it in a later conversation? Do
 13 you understand my question?
 14 A. I understand your question. I just --
 15 Q. In other words, were you, did you
 16 initially just hear, you know, rumor, for lack of a
 17 better -- that you could go give somebody a massage
 18 for \$200, or was it you go give Mr. Epstein a
 19 massage for \$200?
 20 A. I think it was somebody a massage.
 21 Q. Okay. And, and did you understand where
 22 it was going to be, what town?
 23 A. No, I didn't have all the specifics on it.
 24 Q. So, so your best recollection today is
 25 sometime in August, September, October of '02,

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1 somebody told you that you could give somebody a
 2 massage and get \$200.
 3 A. Yes.
 4 Q. Is there anything more you can recall
 5 about the first time you became aware of anything
 6 that was related to Mr. Epstein?
 7 A. With that conversation, with somebody telling
 8 me about --
 9 Q. Yeah, was that the first time you heard
 10 anything about any of it?
 11 A. Yes.
 12 Q. Okay. Anything else you can recall about
 13 the conversation?
 14 A. No.
 15 Q. Do you know who told you this?
 16 A. No.
 17 Q. Was it while you were at school that you
 18 heard this?
 19 A. Yes.
 20 Q. Okay. Do you know if the person that told
 21 you was someone that had done that?
 22 A. Most likely.
 23 Q. But you can't tell me?
 24 A. I don't know who it was, though.
 25 Q. So you're, you're sort of guessing whether

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1 or not --
 2 A. Yes, I am.
 3 Q. Just, if you're, if you're just
 4 speculating and guessing, just, just -- it would be
 5 better to tell me you don't know.
 6 A. Okay.
 7 Q. All right. But if you, if you have a
 8 specific recollection, tell me.
 9 A. Okay.
 10 Q. But if it's -- if you just don't recall,
 11 there's nothing wrong with just saying you don't
 12 recall.
 13 A. Okay.
 14 Q. All right. So I want to be fair to you.
 15 I don't want you to speculate.
 16 A. Okay.
 17 Q. What happened -- what did you do after you
 18 heard this conversation for the first time?
 19 A. I believe I mentioned it to D.D.
 20 Q. And what did you tell D.D.?
 21 A. That I was interested in going there, but I
 22 wanted her to come with me.
 23 Q. Well, had D.D. -- when -- do you recall
 24 whether or not, when you first mentioned it to D.D.,
 25 D.D. had heard anything about it?

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1 A. I don't recall.
 2 Q. When did you form the opinion that you
 3 wanted to follow up on this rumor that you had
 4 heard?
 5 A. I don't know who told me, but the person that
 6 did tell me made it seem like it was just, you go there,
 7 you give him a massage, you get \$200. And to me \$200, I
 8 was like, yeah, why not.
 9 Q. And do you know how long it was from the
 10 time you first heard it that you approached D.D.
 11 about doing it?
 12 A. I don't recall. I don't know.
 13 Q. Okay. So you were -- you -- did you
 14 approach anybody other than D.D.?
 15 A. No.
 16 Q. So you go to D.D. and you tell her, I
 17 heard this story that I, we can go make \$200 giving
 18 somebody a massage?
 19 A. Yes.
 20 Q. Did you tell her anything more at that
 21 time?
 22 A. That's all --
 23 Q. Did you know where it was going to be?
 24 A. No.
 25 Q. Did you know it was going to be in Palm

50 (Pages 194 to 197)

1 Beach?

2 A. No. I don't even know how I found out it was
3 in Palm Beach. It was -- the person that told me about
4 it, I don't, I don't recall exactly what happened. But
5 somehow when I decided to go there, Sarah,
6 Jeffrey Epstein's assistant, contacted me and was the
7 one that set up the reservations.

8 And after this, can I take, I'm
9 sorry, another break to use the restroom?

10 MR. LUTTIER: Sure. We might as well just
11 take a lunch break.

12 MR. MERMELSTEIN: Yeah.

13 THE VIDEOGRAPHER: Going off the record at
14 12:24 p.m.

15 (A luncheon recess was held.)

16 * * * * *

17
18
19
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21
22
23
24
25

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1 A. Not that I recall.
 2 Q. You don't recall making any statement at
 3 all after that?
 4 A. I don't recall that.
 5 Q. What's the next thing that occurred when
 6 you and this person were having this conversation?
 7 A. I don't recall. I don't know.
 8 Q. And do I understand your testimony to be
 9 that you're not sure that these were the words that
 10 were actually spoken?
 11 A. I know those were the words that were actually
 12 spoken. That's all I knew of it, that it was a massage
 13 for \$200.
 14 Q. So you have a specific recollection
 15 somebody, who you don't recall, said to you at
 16 school --
 17 A. Uh-huh, yes.
 18 Q. -- although you don't know if there was
 19 anyone else present, that you could go to a person
 20 and give him a massage and get \$200.
 21 A. Yes.
 22 Q. Is there anything more you can recall
 23 about the conversation?
 24 A. No.
 25 Q. Was there any name used?

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1 A. As in Jeffrey Epstein's name?
 2 Q. Any name.
 3 A. I don't recall.
 4 Q. Do you recall -- I mean, when you say you
 5 don't recall, does that mean the name could have
 6 been said, or you don't believe that a name was
 7 said?
 8 A. It could have been said. I don't remember.
 9 Q. Did you, did you ask any questions in
 10 response to this statement from this person?
 11 A. I don't remember if I did.
 12 Q. Was there any additional information given
 13 to you by this person other than that there was an
 14 opportunity to go to a person's house and give the
 15 person a massage for \$200?
 16 MR. MERMELSTEIN: Objection, asked and
 17 answered.
 18 THE WITNESS: All I recall is that this
 19 person told me it was a \$200 massage. And
 20 somehow, I don't remember, Sarah contacted us
 21 and made the -- for us to go to his house and
 22 do the massage.
 23 BY MR. LUTTIER:
 24 Q. Okay. So, so now this person that said
 25 these things to you, you say nothing at all back to

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1 the person, right?
 2 A. I don't recall if I did.
 3 Q. Okay. You -- well, you didn't give this
 4 person your phone number, did you?
 5 A. The person I was speaking to?
 6 Q. Right.
 7 A. It could have been a friend of mine. I don't
 8 remember the person specifically. I don't know if I
 9 went back to that specific person and said I was
 10 interested, you know, here's my number. I don't, I
 11 don't know.
 12 Q. What's the very next thing you can recall
 13 about your going to Mr. Epstein's after this
 14 conversation with this unnamed person?
 15 A. So you're asking what did I -- what was my
 16 next step that I remember after this person told me
 17 about --
 18 Q. The very next -- yeah, the very next thing
 19 that you did that had anything to do with --
 20 A. Even if it was days later?
 21 Q. Whenever it was, because that's going --
 22 A. I remember I told D.D. about it.
 23 Q. Okay. That's the next thing that
 24 happened? Nothing happened between this unnamed
 25 person telling you of this and you talking to D.D.?

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1 A. I don't recall specifically, but I think I
 2 probably talked to D.D. first before I decided to do the
 3 massage for \$200.
 4 Q. Okay. And you talked to D.D. because she
 5 was your best friend at the time?
 6 A. Yes, we were close.
 7 Q. Any other reason why you, out of --
 8 THE VIDEOGRAPHER: Excuse me, sir, which
 9 button did you push? I just got a text that
 10 this has been muted.
 11 MR. MERMELSTEIN: Oh great.
 12 THE VIDEOGRAPHER: Okay. I just got a
 13 text from my boss saying it's been muted.
 14 (Discussion off the record.)
 15 THE VIDEOGRAPHER: Let me go ahead and
 16 stop it. Going off the record at 3:45 p.m.
 17 Oh, I'm sorry, 1:45.
 18 (A brief recess was held.)
 19 THE VIDEOGRAPHER: We're back on the
 20 record at 1:50 p.m.
 21 MR. LUTTIER: All right. What was the
 22 last question?
 23 (The requested portion of the record was
 24 read by the reporter.)
 25

3 (Pages 204 to 207)

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1 MR. MERMELSTEIN: Form.

2 THE WITNESS: I know, I know that I didn't
3 call her first. I didn't call Sarah first.

4 BY MR. LUTTIER:

5 Q. Well, if you, if you don't -- what I'm
6 trying to find out is, is whether you have a
7 specific recollection or you're just concluding what
8 happened based upon your recollection of other
9 events. Do you know what I'm saying?

10 MR. MERMELSTEIN: Form.

11 BY MR. LUTTIER:

12 Q. In other words, you either know for a
13 fact, you have a specific recollection of who called
14 who, or you don't have a recollection, but you're,
15 you're assuming that they called you, or whatever,
16 from a different set of facts.

17 A. No, I know they called me.

18 Q. Okay. So if you know that they called
19 you, why would you tell either Dr. Kliman or
20 Dr. Hall that you or D.D. called Sarah?

21 MR. MERMELSTEIN: Form, lack of
22 foundation.

23 MR. LUTTIER: If you did.

24 THE WITNESS: But I didn't.
25

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1 that conversation?

2 A. From what I remember, it was when I can go to
3 the house to do the massage and how to get there.

4 Q. Well, wait a minute. I'm going to go take
5 this in steps. Do you, as you sit here today, have
6 a specific recollection of the conversation?

7 A. Yes, it was along those lines.

8 Q. No, I want to know. Can you tell me what
9 was said to you by this person on the other end of
10 the phone?

11 A. I can't tell you every little detail.

12 Q. Can you tell me what you said to this
13 person on the other end of the phone?

14 A. No.

15 Q. I want to know what -- when, when you
16 first got this phone call that you claim you got,
17 where were you?

18 A. I was probably at home. That's not --

19 Q. And I don't want to know probably. Are
20 you saying you don't know?

21 A. I don't know.

22 Q. Okay. Fair enough. Do you remember how
23 long it was between the time you first heard of this
24 opportunity and when you allegedly got this call?
25

A. I don't know.

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1 BY MR. LUTTIER:

2 Q. Okay. Well, let's just assume for the
3 purpose of this question that you made that
4 statement. Tell me why that would ever be possible
5 for you to have, to have made a statement to either
6 Dr. Hall or Dr. Kliman that you or D.D. called
7 Sarah?

8 MR. MERMELSTEIN: Form, lack of
9 foundation.

10 THE WITNESS: I don't, I don't -- I'm, I'm
11 getting confused because you're asking me a
12 question which I don't -- I didn't make a
13 statement about that, so how can I answer that?

14 BY MR. LUTTIER:

15 Q. Okay. Now, do you have a specific
16 recollection of a phone conversation that you
17 personally had with this person you say is Sarah?

18 A. Sarah, Epstein's assistant?

19 Q. Whoever you say Sarah is.

20 A. Sarah, Epstein's assistant, that got the girls
21 to come there?

22 Q. I don't know who it is. You said there
23 was somebody named Sarah that called you.

24 A. Yeah, there's a Sarah.

25 Q. Do you have a specific recollection of

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1 Q. Do you remember on what phone you received
2 this alleged call?

3 A. It was most likely my cellphone.

4 Q. Do you know specifically?

5 A. Yes, because I wouldn't give them my house
6 phone.

7 Q. Why not?

8 A. Because my cellphone is on me at all times and
9 I was never home.

10 Q. Are you, are you certain -- are you
11 guessing that you didn't give your home phone
12 because you carry your cellphone, or do you know for
13 a fact?

14 A. Well, I know for a fact that's what -- the
15 phone I use all the time.

16 Q. And what -- how did this person that
17 called, how did they introduce themselves to you?

18 A. She said her name, hello, I'm Sarah. I work
19 for Jeffrey Epstein. And then I heard you were
20 interested in the massage, and it went along those
21 lines. I don't know the exact conversation. This
22 was -- you know, it was a while ago for the phone call.

23 Q. Six, seven years ago?

24 A. Yes.

25 Q. And did this person say their name was

6 (Pages 216 to 219)

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1 knowing that I wanted her to go with me.

2 Q. Do you recall anything specifically about
3 contacting D.D., D.D.?

4 A. I don't remember specifically, but I'm, I'm
5 sure I told her because she ended up coming with me.

6 Q. Well, did you then have to contact her to
7 arrange a time that she could go?

8 A. I don't recall if Sarah made a time and I told
9 D.D., or if I spoke to D.D. I don't recall.

10 Q. Well, if you spoke to D.D. to find out
11 when she could go, did you then call Sarah back and
12 tell her when you guys could come?

13 A. I would have had to, but I don't recall that.

14 Q. So you don't know which of those things
15 happened. You don't know the specifics about how
16 the meeting was scheduled?

17 A. Exactly.

18 Q. What did D.D., did D.D. -- do you recall
19 what D.D. told you when you contacted her and said
20 you'd received a call from somebody about going and
21 doing this?

22 A. From -- actually from Sarah?

23 Q. When you got the -- when you told D.D.
24 about it, what, what did she say to you?

25 A. I don't remember.

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1 Q. Do you remember where she was when you had
2 the conversation with her about the call you got
3 from Sarah?

4 A. No.

5 Q. Do you remember how long it was between
6 the time that Sarah called you and when you
7 contacted D.D.?

8 A. No.

9 Q. Was it more than a day?

10 A. Probably not.

11 Q. You just don't know.

12 A. I don't know. I really don't. I don't
13 remember.

14 Q. But, but do you have -- do you believe
15 that what you did was you contacted D.D.?

16 A. Yes.

17 Q. And you told her of your communication
18 with this person that you said, said they were
19 Sarah?

20 A. Yes.

21 Q. What's the next thing you recall happening
22 with respect to, to going to Mr. Epstein's?

23 A. The next thing I recall happening is getting
24 picked up in a taxi.

25 Q. How did, how did the taxi know to come get

Page 230

1 you?

2 A. Well, I got Epstein's address from Sarah, and
3 I took the taxi to his house.

4 Q. Well, when did you get Epstein's address
5 from Sarah?

6 A. It was either from the phone call that I had
7 with her the first time, or if I did call her back, I
8 don't recall.

9 Q. Well, then you must have made some notes
10 of a phone call that you had with her, right, in
11 order to write the address down?

12 A. Yeah.

13 Q. Well, do you recall making any notes?

14 A. I don't recall making notes, but I know I have
15 a horrible memory, and if I had -- I had to have his
16 address in order to get the taxi to go there.

17 Q. So do you know when you got the directions
18 from Sarah?

19 A. No.

20 Q. Could have been in a second or third phone
21 conversation with Sarah?

22 A. It could have been.

23 Q. And you would have contacted her, if
24 that's what occurred, to get the, the instructions
25 from her?

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1 A. Yes.

2 Q. Did you get anything from her other than
3 the address?

4 A. No.

5 Q. Did you know where it was?

6 A. She just said Palm Beach and she gave me the
7 address.

8 Q. All right. So, so, at some point in time
9 you contacted a cab company?

10 A. Yes.

11 Q. What cab company?

12 A. I have no idea.

13 Q. And, and where did this cab company pick
14 you up?

15 A. At my father's house.

16 Q. And, and what time of day did they pick
17 you up?

18 A. It was, it was during the day, but I don't
19 know what time it was.

20 Q. Well, was this during the school day --
21 school week?

22 A. No. It couldn't have been.

23 Q. So you didn't go during the school week?

24 A. No.

25 Q. So that would mean it had to be either a

9 (Pages 228 to 231)

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Electronically signed by cynthia hopkins (601-051-976-2934)

Electronically signed by cynthia hopkins (601-051-976-2934)

Electronically signed by cynthia hopkins (601-051-976-2934)

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1 A. No. 2 Q. All right. Do you know whether or not 3 you-all made jokes on the way back to the -- 4 A. We didn't make jokes because we were in shock. 5 Q. Well -- 6 A. I was in shock. 7 Q. If you don't know what was said -- I mean, 8 it's fine to tell me, if you don't know what was 9 said, you don't know what was said. 10 A. Yeah, I don't know what was said. 11 Q. So, it would be a fair statement you just 12 don't have any recollection at all of what happened 13 with the ride back? 14 A. Basically, yes. 15 Q. Okay. And you don't know if you went to 16 your house or her house? 17 A. Correct. 18 Q. Who did you next see after you got dropped 19 off either at your house or her house? 20 A. I don't remember. 21 Q. And this was -- 22 A. I don't remember. 23 Q. This was a Saturday or Sunday? 24 A. I don't know exactly what day it was. It was 25 a day I didn't have school.	1 A. I mean, I don't know. 2 Q. So there's a second incident that comes 3 up. 4 A. Yes. 5 Q. And it's you and D.D. and was it K.M.? 6 A. K.M. 7 MR. LUTTIER: Okay. I'm going to take a 8 little break and go to the bathroom. 9 THE WITNESS: Okay. Me, too. 10 THE VIDEOGRAPHER: Going off the record at 11 3:09 p.m. 12 (A brief recess was held.) 13 THE VIDEOGRAPHER: We're back on the 14 record at 3:18 p.m. 15 BY MR. LUTTIER: 16 Q. Okay. There, there came a, another 17 occasion when you went to Mr. Epstein's house; is 18 that right? 19 A. Yes. 20 Q. Do you remember how long that was after 21 the first time? 22 A. No. 23 Q. Was it a matter of months, years? 24 MR. MERMELSTEIN: I think that this has 25 been asked and answered.
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1 Q. All right. So did you tell your mom or 2 your dad? 3 A. No. 4 Q. Did you call the police? 5 A. No. 6 Q. Did you tell anybody? 7 A. No. 8 Q. All right. But at some point in time, you 9 hooked up with D.D. and your other friend and you 10 went back to Epstein's; is that right? 11 A. Yes. 12 Q. Okay. And, now, I just want to make sure 13 I understand this. Did you get the impression from 14 anything that D.D. said or did that she appeared to 15 be at all upset about this incident? 16 A. The time that we -- 17 Q. Yeah. 18 A. I, I don't remember. You mean, like, from 19 then to the second time that we went? 20 Q. Yeah. 21 A. I mean, I don't know. 22 Q. Did you, did you, you and she ever discuss 23 it? 24 A. I don't recall that, no. 25 Q. Okay.	1 MR. LUTTIER: Well, if I do, I don't 2 recall it, but you can tell me what the answer 3 was. I will accept your representation. 4 MR. MERMELSTEIN: You can, you can answer 5 it again. 6 THE WITNESS: I don't, I don't know. I 7 don't remember what -- 8 BY MR. LUTTIER: 9 Q. Do you, do you have any -- what's your 10 best recollection of the amount of time between 11 these two visits? 12 A. It was -- I mean, it wasn't that far after. I 13 know it wasn't years after. It could have been weeks or 14 months, but it wasn't... 15 Q. Okay. Your best recollection is, it was 16 either weeks or months -- 17 A. Yes, it wasn't -- 18 Q. -- but it was more than a few days? 19 A. Yes. 20 Q. Okay. And how were you contacted about 21 the second occasion? 22 A. I wasn't. I was actually in the vehicle with 23 D.D. and K.M., and they were going over there. 24 Q. And whose vehicle was it? 25 A. D.D.'s.

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1 Q. And, and how was it that you were in
2 D.D.'s vehicle?

3 A. I don't know why I, I was with her. I don't
4 know if I was just hanging out with them, and I guess
5 they wanted to go over there.

6 Q. And when did you first learn, when you
7 were in this vehicle, that where you were going was
8 Epstein's?

9 A. They mentioned it in the car that that's where
10 they were going.

11 Q. And where were you geographically when
12 they mentioned to you in this car that they were
13 going there?

14 A. Like what area?

15 Q. Yeah.

16 A. I have no idea.

17 Q. Where, where were you in this -- do you
18 remember what day of the week it was?

19 A. No.

20 Q. Do you remember what time of day it was?

21 A. No.

22 Q. Do you remember in what area of the city
23 you were, if you were in the city?

24 A. No, I don't know. I don't recall.

25 Q. All you know is you were in a car with

1 A. I don't know exactly where we were at, but we
2 were all together.

3 Q. And you don't know why all of you had
4 gotten in the car initially?

5 A. Exactly.

6 Q. So you don't know if you were going to the
7 movies or shop or whatever?

8 A. Yeah, I don't remember.

9 Q. But your best recollection is, about ten
10 minutes after you got in this vehicle for some
11 unknown purpose, you heard for the first time that
12 this car was headed to Jeffrey Epstein's?

13 A. Yes.

14 Q. Who told you that?

15 A. I don't remember who told me. One of them
16 mentioned it.

17 Q. And what did they say?

18 A. That they're going to Jeffrey Epstein's house.

19 Q. And what was your reaction?

20 A. I don't want to go.

21 Q. And what did they say?

22 A. Well, you're going to come with us.

23 Q. And did you, at any time say, stop, I want
24 to get out?

25 A. No.

1 D.D. and K.M.?

2 A. Correct.

3 Q. And how long had you been in the car
4 before you learned that they were going to
5 Epstein's?

6 A. It was a little while. I'm not sure exactly
7 how long.

8 Q. Roughly, your best estimate, how long?

9 A. Maybe ten minutes, 15 minutes.

10 Q. And why were you in the car?

11 A. I was --

12 Q. Were you -- was there a plan that you were
13 going to be going someplace?

14 A. I was just hanging out with them, and I
15 don't -- I mean, I don't know if we were supposed to be
16 going somewhere or what was going on.

17 Q. Had they picked you up from some place.

18 A. No, I think I was with them, like hanging out
19 with them.

20 Q. Okay. And when you got in D.D.'s car,
21 where were you?

22 A. In the backseat.

23 Q. I mean, were you at, for example, her
24 house when you got in the car, or were you someplace
25 else when you-all got in the car?

1 Q. And did you say anything else to them
2 besides that you didn't want to go?

3 A. I, I argued with them about not going and that
4 it was disgusting to go do that.

5 Q. Had -- did D.D. indicate to you at that
6 time or anytime before that conversation whether she
7 had been back to Epstein's since your first visit?

8 A. Between the time we're in the car and the
9 first visit we went?

10 Q. Yeah.

11 A. Not that I know.

12 Q. All right. To the best of your knowledge,
13 was that her second visit?

14 A. Yeah, to the best of my knowledge.

15 Q. Okay. Did you know when you were in the
16 car that, Chris, whether or not K.M. had ever been
17 there?

18 A. I, I don't -- I think -- I don't know for
19 sure, but I think D.D. was taking her.

20 Q. So you think that K.M. had not been there
21 before?

22 A. That's what I think.

23 Q. Okay. Did you have a conversation with
24 K.M. --

25 A. Yeah, I told her --

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1 Q. Did K.M. indicate whether she knew she was 2 getting paid? 3 A. I'm sure she did. That's why she was going. 4 Q. And what specifically did K.M. tell you in 5 response to your warnings? 6 A. She didn't care. 7 Q. All right. So how long did this ride take 8 to get to Epstein's? 9 A. I don't know, I mean -- 10 Q. More than a half hour? 11 A. From -- I mean, I don't even know where we 12 were at, but it was, it was more than 20 minute. 13 Q. And this whole time is it dedicated to you 14 telling your girlfriends that you don't want to go? 15 A. Not the entire time. I tried to talk them out 16 of it or tried to talk K.M. out of it for a little 17 while, and she -- K.M. didn't listen, so... 18 Q. Okay. So, D.D. was navigating the car. 19 She apparently remembered how to get to Epstein's 20 house. 21 A. I don't know how she -- I mean, I don't know 22 if she spoke to Sarah again. I don't know exactly along 23 the lines how she got there again. 24 Q. But she navigated the car to Epstein's 25 house.	1 this, and the driveway goes to the side of the house, 2 and there's -- I think there was garages on the side. 3 Q. Okay. And, and what kind of car did D.D. 4 have? 5 A. At that time? 6 Q. Yeah. 7 A. She's had a couple of cars. I'm going -- I'm 8 going to, I'm going to guess it was her, a Lexus. 9 Q. You say you're guessing? 10 A. I'm pretty sure it was a Lexus. I don't know 11 100 percent because she borrowed her mom's car and stuff 12 like that. 13 Q. Was this her mom's car that you-all were 14 in? 15 A. Her mom gave her that car. 16 Q. Okay. So it was -- do you remember what 17 model it was? 18 A. No. 19 Q. Leather interior? 20 A. I think it was leather. 21 Q. Okay. All right. So you get to the 22 house. 23 A. Uh-huh. 24 Q. Where are you, where are you in the car, 25 in the front seat or backseat?
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1 A. Yeah, she got to Epstein's house, but I don't 2 know how. 3 Q. Okay. When you got to the house, what did 4 you do? 5 A. I -- 6 Q. I mean where did you park the car? 7 A. I think she's pulled -- I mean, I'm not going 8 to say definite, because I don't remember that, but I 9 think she pulled into the, the driveway that he had 10 through the gates. 11 Q. What kind of driveway is it? 12 A. What do you mean, what kind of driveway? 13 Q. Well, describe the driveway as best you 14 can. 15 A. I know there was gates. I don't recall, I 16 don't know if there was two entrances or one. 17 Q. I mean, is it, is it like an asphalt-paved 18 driveway? 19 A. Oh, I have no idea. 20 Q. Do you know any -- do you know anything 21 about the driveway? 22 A. I don't remember. 23 Q. Where's the driveway in relationship to 24 the house? 25 A. It's -- you go in, and then the house is like	1 A. I'm in the backseat. 2 Q. And, and who -- and D.D.'s driving. Is it 3 bucket seats in the front? 4 A. What's bucket seats? 5 Q. You know, were they bucket seats or a 6 bench seat in the front? 7 MR. MERMELSTEIN: Do they make bench seats 8 in the front anymore? 9 MR. LUTTIER: I'm, I'm dating myself. 10 BY MR. LUTTIER: 11 Q. Do you know what a, a bench seat would 12 be -- a bucket seat was, is, is individual seats. 13 A. Oh, it's individual seats. 14 Q. There's a console so you can't -- 15 A. Oh, yeah, that's how it is. 16 Q. All right. So you're in the backseat. 17 A. Uh-huh. 18 Q. Do you remember if you're behind the 19 driver or the passenger? 20 A. I think I was in the middle. 21 Q. All right. All right. 22 A. I think because I was -- 23 Q. So sitting on the hump, as they say? 24 A. Yes. 25 Q. And what were you wearing?

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1 A. I have no idea.
2 Q. What was D.D. wearing?
3 A. I have no idea.
4 Q. What was K.M. wearing?
5 A. I have no idea.
6 Q. And you don't know what time of day it
7 was?
8 A. No.
9 Q. Okay.
10 A. During the day.
11 Q. When, when you get there, what happens?
12 A. I don't, I don't recall how we got in the
13 house or I don't remember how that happened. All I
14 remember is they went upstairs, D.D. and K.M., and I
15 stayed in the kitchen area with the chef. There was a
16 chef there.
17 Q. Let's go back into the driveway. Did
18 anybody come out of the house to meet you?
19 A. Not that I recall.
20 Q. Did you-all get out of the car and walk
21 someplace?
22 A. We walked -- I mean, I think we walked into
23 the house. I don't recall.
24 Q. Well, did you just walk in the house, or
25 did you walk to a door, or his door?

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1 A. I'm sure we walked to a door.
2 Q. What door?
3 A. The front door.
4 Q. The front of the house?
5 A. Yes.
6 Q. Okay. Do you remember what the door was
7 like?
8 A. No.
9 Q. Is it a double door or single door?
10 A. I have no idea.
11 Q. Has it got anything on it?
12 A. I don't recall that.
13 Q. All three of you walked up to the door?
14 A. From what I vaguely remember.
15 Q. Okay. Is there anything that prevented
16 you from just staying right in the car?
17 A. No.
18 Q. Why didn't you just sit in the car?
19 A. I don't know.
20 Q. Why didn't you walk away?
21 A. Walk away where?
22 Q. Just walk away; walk down the street.
23 A. To go where?
24 Q. Anywhere you wanted to.
25 A. Down to the neighborhood?

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1 Q. This house, this is this evil house that
2 you've been to --
3 A. Yes.
4 Q. -- where you had a traumatic experience,
5 right?
6 A. Yes.
7 Q. So why didn't you just not go in the
8 house?
9 A. I don't know.
10 Q. Okay. But, anyway, you get to the door.
11 What happens?
12 A. They go upstairs. I don't --
13 Q. Wait a minute. Somebody has to answer the
14 door, right?
15 A. I don't remember that.
16 Q. Who answers the door?
17 A. I don't remember.
18 Q. Was it Jeffrey Epstein?
19 A. Honestly, I don't recall. I don't know.
20 Q. You don't know who was there, so you can't
21 describe what they were wearing?
22 A. No.
23 Q. Were there other people in the house?
24 A. All I remember is the chef.
25 Q. Okay. And what's his name?

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1 A. I have no idea.
2 Q. Did you see Sarah on this occasion?
3 A. I don't remember seeing her, no.
4 Q. Okay. Well, if you don't remember seeing
5 her and there was a chef, but you can't tell us who
6 answered the door?
7 A. No.
8 Q. Do you recall seeing Jeffrey Epstein on
9 this occasion?
10 A. Yes, I did.
11 Q. Okay. When did you see him?
12 A. At the end of everything.
13 Q. Okay. And you had not seen him since you
14 left the previous time?
15 A. Exactly.
16 Q. All right. So, you say D.D. and K.M.
17 walked upstairs.
18 A. Yes.
19 Q. You weren't up there?
20 A. No.
21 Q. And you don't know what happened up there?
22 A. I figured --
23 Q. You don't know what happened?
24 A. I don't know what happened up there with them.
25 Q. Did anybody tell you what happened up

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1 there? 2 A. No. 3 Q. When you left, did they tell you what 4 happened up there? 5 A. No, not that I remember. They didn't tell me 6 anything about it. 7 Q. And you walked from the front door to the 8 kitchen. 9 A. I, I'm -- from the front door to the kitchen? 10 Q. Yeah. 11 A. Yeah, I'm guessing. How else would I get 12 there? 13 Q. Well, did somebody meet you at the front 14 door? They must have, right. 15 A. There must have been somebody, but I cannot 16 recall who it was. 17 Q. You didn't just walk into the guy's house. 18 A. No. 19 Q. So somebody met you there. 20 A. Yes. 21 Q. And that somebody, did that somebody take 22 K.M. and D.D. upstairs? 23 A. Yes. 24 Q. So what did you do when that somebody 25 started taking K.M. and D.D. upstairs?	1 A. Yes. 2 Q. Tell me what words you used. 3 A. I don't know the exact words. 4 Q. Well, what's your best recollection of the 5 words? 6 A. I don't have a best recollection because I 7 don't remember. 8 Q. Well, why did you tell him to pay you 9 money? 10 A. Because I was upset with even being there. 11 Q. Well, what had you done that you thought 12 you were entitled to money for? 13 A. I didn't do anything. 14 Q. So why did you think he would pay you 15 money? 16 A. Because -- I don't know why. I just -- for 17 being in his house and him putting me through what he 18 did, I was pissed off and -- 19 Q. What even made you think that he would 20 give you money? 21 A. Because K.M. was there. 22 Q. Oh, were you asking for money for bringing 23 K.M.? 24 A. No, because I didn't bring her. 25 Q. Okay. So how much did you ask for?
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1 A. They probably took me to the kitchen first, 2 and then they took them. I didn't just walk to the 3 kitchen, I know that. 4 Q. If you don't recall, tell me you don't 5 recall. I don't want to, I don't want you to guess. 6 A. Okay. I don't recall. I just know I wasn't 7 upstairs and I ended up in the kitchen. 8 Q. Okay. So you don't know whether you told 9 somebody you didn't want to go upstairs or you just 10 walked to the kitchen? 11 A. I know I didn't walk to the kitchen alone. 12 Q. All right. So you go to the kitchen. All 13 right. You get paid no money for going there. 14 A. No, I did get paid. 15 Q. You did? 16 A. Yes. 17 Q. Well, who paid you money for going there? 18 A. Jeffrey Epstein. 19 Q. What did you get paid for? 20 A. Because I was there and I was pissed off, so I 21 told him that he needs to give me money. 22 Q. So you demanded of Jeffrey Epstein -- 23 A. Not demanded, but... 24 Q. Did you say the words to him that you 25 wanted money?	1 A. He gave me 200. 2 Q. How much did you ask for? 3 A. I didn't ask for anything. 4 Q. Well, you just told me you told him that 5 you wanted money. 6 A. Yeah, but I didn't ask for a specific amount. 7 Q. So you -- well, you -- did you just say, I 8 want money? 9 A. I don't recall how I asked him. 10 Q. So you might have asked him for a specific 11 amount. 12 A. I don't think I did. 13 Q. You just have no recollection? 14 A. I don't have no, no. 15 Q. But you know you got money. 16 A. Yes. 17 Q. You went to this horrible place and you 18 got money for going there? 19 A. Yes. 20 Q. And you took the money? 21 A. Yes. 22 Q. As a matter of fact, you demanded the 23 money. 24 MR. MERMELSTEIN: Form. 25 THE WITNESS: I didn't demand it.

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1 Q. And I think your brother at one time was 2 on Ritalin was the medication. 3 A. Yes. 4 Q. And you had taken some of that -- 5 A. Yes. 6 Q. -- when you were maybe in high school? 7 MR. MERMELSTEIN: Make sure you let him 8 finish his question before you answer. 9 THE WITNESS: Oh, okay. 10 BY MR. LUTTIER: 11 Q. It was maybe like in high school you took 12 some of his Ritalin? 13 A. Yes. 14 Q. And you found that it was effective in 15 terms of allowing, helping you to concentrate? 16 A. Yes. 17 Q. Is that how you knew that when you went to 18 see the psychiatrist in Virginia that you wanted 19 Adderall? 20 A. Yes. 21 Q. Is there -- for what period of time did 22 you take your brother's Ritalin? 23 A. It was just for a short period of time. 24 Q. Like less than a month? 25 A. Yes.	1 alternative school. 2 Q. Okay. Typically classes here graduate in 3 June of a year. 4 A. Okay. 5 Q. So, when you say you got it late that 6 year, did you get it -- 7 A. Late. 8 Q. -- within the same calendar year that you 9 would have received it had you -- 10 A. I'm pretty sure it was in 2006. I was 11 supposed to graduate 2005. 12 Q. Okay. So, we know that in June if, if you 13 had stayed in school for each year and progressed by 14 passing every year, you would ordinarily have 15 graduated in June of '05? 16 A. Yes, I didn't stay back. 17 Q. No. Yeah, I understand that. 18 A. Okay. 19 Q. I'm just going back to your birthday. 20 That, that would mean that that would put you then 21 at 18 years of age June of '05 when you graduated? 22 A. Yes. 23 Q. So that would put you as a sophomore, 16 24 years of age? 25 A. Yes.
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1 Q. Okay. Is there -- and that would have 2 been when you were how old? 3 A. I was in high school. 4 Q. Freshman year? 5 A. No. 6 Q. Were you living in Jupiter at that time? 7 A. No. This was probably my sophomore year. 8 Q. Which would have made you 15 years old? 9 A. Yeah, 15 or 16. 10 Q. Okay. Your date of birth is October 27th, 11 '86? 12 A. Uh-huh. 13 Q. So do you know, do you know in your 14 sophomore year how old you were? 15 A. No. 16 Q. Okay. Let's go -- 17 A. I was -- 18 Q. -- let's go backwards. You, you got a 19 diploma from the Palm Beach County school system. 20 A. Yes. 21 Q. Did you get that in the same year that, 22 that you would have graduated from -- 23 A. No. 24 Q. -- high school class? 25 A. I got that late because I went to an	1 Q. Okay. So you, your best recollection is, 2 you, you had taken your brother's Adderall sometime 3 when you were about 16 years of age? 4 A. Yes. 5 Q. And then you took it for a month or two? 6 A. For about a little less than a month. 7 Q. Okay. Is there -- why did you not follow 8 up, if you found it to be effective, with a 9 physician to get a prescription of your own? 10 A. I just didn't want to. I, I don't know why. 11 Q. Is -- do you recall what it is that caused 12 you in 2007 when you went to see the psychiatrist in 13 Virginia to ask for the first time for Adderall? 14 A. I didn't ask for Adderall specifically. I 15 went in and asked her, you know, what I, what she would, 16 you know, refer to me. And I mentioned a couple of 17 pills, but the reason is because I was going back to 18 school. 19 Q. Okay. And, and you had arrived at the 20 decision at that point you thought some kind of 21 medication would assist you in being able to 22 concentrate better? 23 A. Yes. In school, yes. 24 Q. Were you ever diagnosed by a doctor as 25 formally having Attention Deficit Disorder?