

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV-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. 6

Wednesday, February 17, 2010
10:10 - 4:55 p.m.

250 Australian Avenue
Suite 150
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting Services
Job No.: 1311

EXHIBIT B
Original

1 quote, unquote, messed up has anything to do with
2 your one-time visit to Mr. Epstein's home, do you?

3 MR. HOROWITZ: Object to the form.

4 THE WITNESS: No, I don't know why.

5 BY MR. CRITTON:

6 Q. Okay. Well, you had issues of being,
7 quote, unquote, messed up, to use your term, before
8 you ever went to Mr. Epstein's home, didn't you?

9 A. Well, I didn't start getting, start falling
10 off until I was like 14.

11 Q. Is, is --

12 A. It's when I started getting in trouble in
13 school and started getting in trouble, period.

14 Q. Okay. Are, are you saying that prior to
15 you -- well, and let me ask that: From records I've
16 seen is you claim you were at Mr. Epstein's home on
17 the one occasion on August 8th of 2004; is that
18 correct?

19 A. Yeah.

20 Q. Yes?

21 A. August 2000 --

22 Q. August 8th, 2004.

23 A. Yes.

24 Q. Okay. And you remember that because that
25 was the birthday of your friend Melissa?

1 told me she would call me before, before we were going
2 to go.

3 Q. Okay. Well, did she say it in front of
4 anyone? Like --

5 A. I don't know.

6 Q. -- was Jane Doe there at the time or
7 Melissa?

8 A. I don't think so.

9 Q. Okay. Did you say, well, what, who am I
10 going to massage?

11 A. No, I didn't ask her.

12 Q. Okay. Did she say where you were going?

13 A. No.

14 Q. Did she say anything other than do you
15 want to make \$200 giving a massage?

16 A. No. She told me she would call me the night
17 before, and that's it.

18 Q. How many days passed before she called
19 you?

20 A. I don't know. I don't know.

21 Q. And I think you told me that when she
22 asked you -- well, the, the day you remember going
23 was August 8th, '04, because it was Melissa's
24 birthday, correct?

25 A. Yes, her 16th birthday.

1 Q. Okay.

2 MR. HOROWITZ: Do you need a break now?

3 THE WITNESS: Huh?

4 MR. HOROWITZ: Are you okay?

5 THE WITNESS: Yeah, I'm going to have to
6 go pee in a little bit, but we'll be all right.

7 MR. HOROWITZ: We've been going an hour.

8 MR. CRITTON: Do you want to take a break
9 now?

10 THE WITNESS: It don't matter. We can
11 finish.

12 MR. CRITTON: Okay. Just tell me --

13 THE WITNESS: Okay.

14 MR. CRITTON: -- when you need to.

15 BY MR. CRITTON:

16 Q. You, I think you told me that you'd known
17 Jane Doe through [REDACTED] for about a year?

18 A. Yes.

19 Q. And were you still in school at the time?

20 A. Yeah, maybe.

21 Q. Okay. And, and you knew Jane Doe because
22 she was in school with [REDACTED] or they were friends?

23 A. No, they were friends. I don't know if they
24 were in school together.

25 Q. And what did you know about Jane Doe's

1 Q. Okay. Did -- was she fun to be around?

2 A. Yeah.

3 Q. Did she seem to be someone who could make
4 a decision?

5 A. We'd all would make a decision together. I
6 mean, it wasn't like she would take control and be like,
7 well, we're going here and this is the only place we're
8 going. It wasn't like that.

9 Q. Okay. If, if she didn't want to do
10 something, would she speak up and say I'm not going
11 to do that?

12 A. I don't -- I think she would still come.

13 Q. All right. Did she, but did she seem to
14 have, did she seem to have the ability to make her
15 own decisions what she wanted to do or not to?

16 MR. HOROWITZ: Form.

17 THE WITNESS: I don't, I don't know. I
18 would, I don't know how to, no, I don't know
19 how to say that.

20 BY MR. CRITTON:

21 Q. You don't know one way or the other?

22 A. Yeah, I don't.

23 Q. All you know is you got along fine with
24 her?

25 A. Yeah.

1 Q. She was a good friend at the time during
2 that time period?

3 A. Yes.

4 Q. And you were, and [REDACTED] as well was a
5 good friend?

6 A. Yes.

7 Q. Had -- well, did [REDACTED] ever go to
8 Mr. Epstein's house?

9 A. I don't know.

10 Q. Did you ever ask her?

11 A. No.

12 Q. Okay. Do you know whether ever, Jane Doe
13 ever went to Mr. Epstein's house?

14 A. I don't know.

15 Q. And did you ever ask her?

16 A. I heard them talking about it like talking
17 about how she goes, and she goes somewhere to make money
18 or goes to somebody's house to clean it or something,
19 but I never asked her about it.

20 Q. All right. How, how was it that you
21 happened to go to Mr. Epstein's house?

22 A. How?

23 MR. CRITTON: In fact, this is a good
24 place to take a break.

25 THE VIDEOGRAPHER: Going off the video

1 Q. Okay. Did -- and then I think you said
2 you -- there was another person you knew was E.W.?

3 A. Yeah, I didn't really know her. I just seen
4 her. Sometimes say hi to her when she came over to Jane
5 Doe's.

6 Q. Did she, would she come over to Jane Doe's
7 house at [REDACTED]

8 A. Yes.

9 Q. Okay. Did you see her there a bunch of
10 times or, you know, three or four times, something
11 like that?

12 A. Yeah.

13 Q. Okay.

14 A. A bunch of times.

15 Q. Was she your age or older?

16 A. She was a little bit older. I think she was
17 Jane Doe's age or something.

18 Q. And how, how much older did you think Jane
19 Doe was than you?

20 A. Jane Doe was 16 or 17 or something.

21 Q. Okay. And at, and that, is that what she
22 told you or is that what you thought?

23 A. I thought she was 16 or something.

24 Q. And I think you told me that you
25 understood from just kind of listening is that Jane

1 Doe said that she was making money cleaning house?

2 MR. HOROWITZ: Form.

3 THE WITNESS: Something like that.

4 BY MR. CRITTON:

5 Q. Is that, I mean I'm just -- is that what
6 you told me?

7 A. Yes, it's what -- I heard something about her
8 going somewhere to make money.

9 Q. Okay. And did you hear she was going over
10 to Palm Beach to do that?

11 A. No.

12 Q. And who told you that?

13 A. I overheard her and E.W. talking one time.

14 Q. And did she tell you or what, from what
15 you heard did it sound like she'd been there a bunch
16 of times?

17 A. Yeah.

18 Q. And from the description when you heard
19 she and E.W. talking about it, did it seem like it
20 was a big deal or a little deal --

21 A. No, I just --

22 Q. -- or just casual conversation?

23 MR. HOROWITZ: Form.

24 THE WITNESS: Casual conversation. I just
25 heard them talking.

1 Jessie?

2 A. No.

3 Q. Tell me how, how it was that you came to
4 learn about Mr. Epstein:

5 A. Jane Doe asked me if I wanted to, or E.W.
6 asked me if I wanted to come and make some money with
7 her.

8 Q. And how many times of, that is, how many
9 times had you seen E.W. before, E.W. raise that
10 issue with you?

11 A. She would come by, well, every -- most of the
12 time I was over there, she would stop by.

13 Q. All right. And how many times had you
14 seen her? I mean, did you know her then, now, I
15 don't mean as a close friend, but did you know her
16 well enough that she'd say hey, Jane Doe No. 6? Do
17 you go by Jane Doe No. 6, Jane Doe No. 6?

18 A. Jane Doe No. 6.

19 Q. Hey, Jane Doe No. 6, do you want to come
20 over and make some money, that kind of comment?

21 A. Yeah.

22 Q. Okay. And, and again I don't want to put
23 words in your mouth. What, what did she say to you?

24 A. She asked me if I wanted to make some money
25 doing a massage.

1 Q. Okay. And what did you say?

2 A. I told her yeah.

3 Q. Okay. And did you, had you ever given
4 anyone a massage before?

5 A. No.

6 Q. Had you ever given Bethany a massage
7 before?

8 A. No.

9 Q. Had Bethany ever given you a massage?

10 A. No.

11 Q. Had you ever had a massage?

12 A. I know what they are, but I've never gotten
13 one or given one, no.

14 Q. And when E.W. said would you like some, to
15 make some money giving a massage, and you said yes,
16 did she --

17 A. Yeah.

18 Q. Okay. Did she tell you how much money you
19 could make?

20 A. Yeah.

21 Q. What did she say?

22 A. \$200.

23 Q. And did you ask and she said -- after she
24 said that, you said yes, what did she say then?

25 A. She told me she would call me before. She

1 told me she would call me before, before we were going
2 to go.

3 Q. Okay. Well, did she say it in front of
4 anyone? Like --

5 A. I don't know.

6 Q. -- was Jane Doe there at the time or
7 Melissa?

8 A. I don't think so.

9 Q. Okay. Did you say, well, what, who am I
10 going to massage?

11 A. No, I didn't ask her.

12 Q. Okay. Did she say where you were going?

13 A. No.

14 Q. Did she say anything other than do you
15 want to make \$200 giving a massage?

16 A. No. She told me she would call me the night
17 before, and that's it.

18 Q. How many days passed before she called
19 you?

20 A. I don't know. I don't know.

21 Q. And I think you told me that when she
22 asked you -- well, the, the day you remember going
23 was August 8th, '04, because it was Melissa's
24 birthday, correct?

25 A. Yes, her 16th birthday.

1 Q. I read someplace -- had, had Melissa been
2 in an accident or something?

3 A. Yes.

4 Q. So she was in a cast or something?

5 A. No. Her pelvis was broken, so I don't know if
6 she had a cast underneath, but I know that she couldn't
7 move.

8 Q. Was it an automobile accident?

9 A. Yes.

10 Q. And so did you, were you at Melissa's
11 house at the time that you went with E.W.?

12 A. No.

13 Q. This is when she first asked you.

14 A. No. We were at Jane Doe's house when she
15 first asked me.

16 Q. Okay. You were at Jane Doe's house when
17 she first asked you. Do you remember whether Jane
18 Doe was there at the time E.W. asked you?

19 A. No, I don't remember.

20 Q. Okay. Did Jane Doe ever ask you if you
21 wanted to go?

22 A. No.

23 Q. When she said to you the first time, you
24 know, do you want to earn \$200 giving a massage, did
25 you say I'm not interested?

1 A. No, I told her yes.

2 Q. Okay. Well, you had never given anyone a
3 massage?

4 A. No.

5 Q. All right. So, why would you agree to go
6 give someone a massage for, for any amount of money?

7 A. I was a kid and I just wanted some money.

8 Q. Okay. Were you high at the time? May
9 have been?

10 A. Maybe.

11 Q. Okay. Did you ask E.W. on that occasion
12 when she asked you, did you say, well, what, who do
13 I have to massage?

14 A. No, I didn't ask.

15 Q. Did you ask her where the massage was
16 going to take place?

17 A. No.

18 Q. Did you ask her what you had to do for the
19 massage?

20 A. No.

21 Q. Did you say what do I have to wear?

22 A. No.

23 Q. Did you ask her how are we going to get
24 there?

25 A. No.

1 Q. Did you ask her anything whatsoever about
2 what, what to expect?

3 A. No.

4 Q. Did Ms. E.W. tell you anything about what
5 to expect?

6 A. No.

7 Q. Did she tell you at least on that first
8 occasion when she asked you, did she say this is
9 where we're going?

10 A. No.

11 Q. So, she didn't tell you a place --

12 A. No.

13 Q. -- where you were going? She didn't tell
14 you what the massage would consist of or not consist
15 of?

16 A. No.

17 Q. She didn't tell you who was going to
18 massage, be massaged?

19 A. No.

20 Q. She didn't tell you whether it was a male
21 or a female?

22 A. No.

23 Q. She didn't tell you whether it was a group
24 massage?

25 A. No, she didn't.

1 Q. She didn't tell you what you had to wear?

2 A. No.

3 Q. Okay. So she calls you. Did you give her
4 your cellphone number or did she already have your
5 number?

6 A. I gave her my house number or something. I
7 don't know.

8 Q. Did you have a cellphone at the time?

9 A. No.

10 Q. All right. So, you gave her your house
11 number?

12 A. Yes.

13 Q. Had she, had she, E.W., ever been to your
14 house?

15 A. E.W., no, I don't think so.

16 Q. And you had only seen E.W. over at Jane
17 Doe's house?

18 A. Yes.

19 Q. Had E.W. ever come over to Melissa's
20 house?

21 A. Yeah.

22 Q. You had seen her at Melissa's house as
23 well?

24 A. Yeah, I've seen her like in the parking lot or
25 something, but like never inside.

1 Q. All right. Where -- when, when E.W.
2 called, how long did the conversation last that,
3 hey, I'm going to, do you still want to go?

4 A. Yeah, she asked me if I want to go and that
5 she would be at my house the next morning. She was
6 going to get dropped off and that's it.

7 Q. Okay. When E.W. called, how long was the
8 call, like --

9 A. I don't know.

10 Q. Three minutes or a minute?

11 A. I don't know.

12 Q. Well, did she just basically say, hi, this
13 is E.W., do you still want to go?

14 A. She asked, she asked for me. I got on the
15 phone. She was like, hey, this is E.W., are you still
16 up for that and I was like, yeah.

17 Q. Okay. Did, did you ask her at that time
18 where are we going?

19 A. No.

20 Q. What are we going to do?

21 A. No, I didn't ask her.

22 Q. Did you ask her who you were going to
23 massage?

24 A. No.

25 Q. Did you ask her how you would be paid?

1 A. No.

2 Q. Was it a check or cash?

3 A. No, I assumed cash.

4 Q. Okay. And did you ask her whether the
5 person who was going to be massaged, or people who
6 were going to massaged were male or female or both?

7 A. No.

8 Q. Did you tell E.W. I don't know how to give
9 a massage?

10 A. No.

11 Q. All right. When E.W. was on the phone
12 other than saying would you like, do you still want
13 to go, give, you know, do you still want to go and
14 you said yes, did she say where you were going?

15 A. No. She told me she would be at my house the
16 next day.

17 Q. Okay. She didn't tell you where you were
18 going?

19 A. No.

20 Q. She didn't tell you who or how many people
21 you were going to massage?

22 A. No.

23 Q. She didn't tell you whether they were male
24 or female?

25 A. No.

1 Q. She didn't tell you what the massage would
2 consist of?

3 A. No.

4 Q. Did you tell her that you'd never given
5 anybody a massage?

6 A. No.

7 Q. That never came up?

8 A. No.

9 Q. Okay. And I assume that there was at no
10 time any con, any conversation with regard to
11 whether or not any type of physical or sexual
12 activity would occur?

13 A. Excuse me?

14 Q. No one, E.W. never said, well, if you're
15 going to give the massage, this may occur in a
16 sexual way?

17 A. No.

18 Q. Okay. No type of sexual activity was
19 discussed whatsoever?

20 A. No.

21 Q. Either by you with E.W. or E.W. with you
22 at any time, correct?

23 A. No.

24 Q. That's correct?

25 A. Yes, that's correct.

1 Q. Did E.W. tell you what to wear?

2 A. When she came the next day, she told me the
3 day that she came when we were going, she told me I had
4 to look older, put makeup on, and tell him I was older.

5 Q. Okay. That's when she got to your house?

6 A. That's, she told me I had to dress older,
7 yeah.

8 Q. When she came to your house?

9 A. Yes.

10 Q. Okay. Was anybody at your house when E.W.
11 came?

12 A. I don't -- maybe.

13 Q. Okay. So E.W. gets dropped off at your
14 house by whom, do you know?

15 A. No, I don't know.

16 Q. She gets dropped off, what, by 9:00 did
17 you say?

18 A. I don't know. Sometime in the morning.

19 Q. Did she tell you what time you had to be
20 where you were going?

21 A. No.

22 Q. Okay. When, when she drops you off at the
23 house or when --

24 A. She gets dropped off.

25 Q. I'm sorry, right. When E.W. gets dropped

1 A. She told me to tell him I was older in the car
2 on the way there.

3 Q. Okay. But at, at your place --

4 A. No.

5 Q. -- as you're changing clothes and putting
6 on makeup, she just said you need to look older?

7 A. Yes.

8 Q. And did you say why do I have to look
9 older?

10 A. No, I didn't ask.

11 Q. Why not?

12 A. I just didn't ask.

13 Q. Okay. Did -- and you said, earlier you
14 said I want you to look, you need to look older for
15 him?

16 A. She said I need to look older. She didn't
17 say, say specifically who or --

18 Q. Well, the record is going to reflect but
19 you remember now that she said you just need to look
20 older?

21 A. Yes.

22 Q. Okay. So, you changed clothes. You put
23 on makeup and what happened next?

24 A. She -- we left and went to the front of the
25 neighborhood and she called a cab.

1 Q. You went to the front of the neighborhood?

2 A. Yes.

3 Q. And do you remember anyone being in your
4 house with you?

5 A. I don't remember.

6 Q. Okay. Do you remember why you went to the
7 front of the neighborhood as distinct from just
8 having a cab come to your, to your home?

9 A. Because I live next to the office and
10 everybody would know if I was getting picked up by a
11 cab.

12 Q. So what? Why didn't you want anybody to
13 know that you were getting picked up by a cab?

14 A. Because I'm 13 getting into a cab. I mean --

15 Q. Okay. And you knew that, you knew back
16 when you were 13 getting in, picked up by a cab in
17 front of your house was a problem?

18 A. Yeah.

19 Q. And it would create everybody asking a lot
20 of questions?

21 A. Yeah.

22 Q. So, if you knew that getting in a cab was
23 a problem and maybe something you shouldn't have
24 done, why were you getting into a cab willing to go
25 in a cab with E.W. to go give someone a massage or

1 A. No, I didn't say that.

2 Q. You could have though?

3 A. I could have.

4 MR. HOROWITZ: Form.

5 BY MR. CRITTON:

6 Q. And so you voluntarily, at least at Jane
7 Doe's house, on the phone with E.W., and getting
8 ready after E.W. came to your house and now getting
9 in the cab, four different times and you had the
10 opportunity to say, I'm not interested, true?

11 A. True.

12 Q. And each time you said, okay, I will go;
13 that is you made a voluntary and consensual decision
14 to go with E.W.?

15 A. Yes.

16 Q. So, now you're riding over in the cab.
17 And did E.W. at some point tell you where you're
18 going?

19 A. I don't remember.

20 Q. Did she tell the cab driver where to go?

21 A. I guess. She had to have.

22 Q. But did you hear her say it?

23 A. I don't remember.

24 Q. How long was the cab ride?

25 A. Like 20 minutes, 25 minutes. I don't know.

1 Q. And where did you, where did the cab
2 ultimately go?

3 A. Some house over the bridge.

4 Q. Had you been to Palm Beach before?

5 A. Not before then, no.

6 Q. Other than this one occasion have you been
7 back to Palm Beach?

8 A. Yes.

9 Q. For what purpose?

10 A. My husband does, he used to do drywall. My
11 boyfriend used to do drywall and his jobs that used to
12 be on Palm Beach Island.

13 Q. Okay. Where, where was it, on the north
14 end, the middle?

15 A. I don't really remember.

16 Q. Okay. Did you ever go back near or show
17 him where Mr. Epstein's house was at any time?

18 A. No. I don't even remember where it's at.

19 Q. When you -- so, during the 20-minute car
20 ride or cab ride that you took to Mr. Epstein's
21 house -- well, you didn't know it was Mr. Epstein --
22 to where you were going.

23 Let me start again. During the 20-minute
24 cab ride that you had from Tavares Cove, the front
25 of Travares Cove to where E.W was taking you, did

1 you talk to her?

2 A. She told me I had to say I was older and
3 that's about it. I really -- I didn't talk.

4 Q. Okay.

5 A. I don't remember.

6 Q. Did she tell you how old you had to say
7 you were?

8 A. No, she never told --

9 Q. Did she know how old you were?

10 A. Huh? Did she know?

11 Q. Did E.W. know how old you were?

12 A. I don't know. She might have.

13 THE VIDEOGRAPHER: Sir, now would probably
14 be a good time --

15 MR. CRITTON: All right.

16 THE VIDEOGRAPHER: -- to change the tape.
17 Going off the record at 4:01. This marks the
18 end of Tape 2.

19 (A brief recess was held.)

20 THE VIDEOGRAPHER: We're back on the
21 record at 4:02 p.m. This marks the beginning
22 of Tape 3.

23 MR. HOROWITZ: Are you all right?

24 THE WITNESS: Yeah, it sucks. I've got to
25 stay up for another five hours, six hours.

1 A. Yeah.

2 Q. And did you say who is this guy?

3 A. No. I didn't ask her.

4 Q. You still didn't know where you were
5 going?

6 A. No.

7 Q. Didn't know what you were going to do?

8 A. No.

9 Q. Didn't know what you were going to do for
10 200 bucks?

11 A. No, I knew what I was supposed to do.

12 Q. Which is what?

13 A. What she told me, a massage.

14 Q. And what, what did she tell you the
15 massage consisted of?

16 A. She didn't tell me like details. She just
17 told me it was a message. Bless you.

18 Q. Excuse me. If you've never given a
19 massage and you've never had a massage, what did you
20 think you'd have to do for the \$200?

21 A. Give him a massage. I know what a massage is
22 but I've never got one or given one.

23 Q. What did you think a massage was?

24 A. Rubbing someone's back.

25 Q. Okay. How, how did you know that was what

1 a massage was?

2 A. I mean in movies, or I mean, anything that you
3 could see a spa, a massage is the same thing pretty
4 much.

5 Q. Okay. Had you ever seen someone get a
6 massage other than in a movie?

7 A. No, I've never seen front-to-front,
8 face-to-face massage, no.

9 Q. Have you ever seen -- meaning -- okay.
10 All you had seen is someone rubbing someone's back
11 in the movies?

12 A. Yes.

13 Q. You've seen them rubbing people's legs,
14 and --

15 A. No.

16 Q. -- their buttocks and their thighs and
17 stuff like that?

18 A. No.

19 Q. All right.

20 THE VIDEOGRAPHER: Excuse me, you're
21 covering up the microphone.

22 THE WITNESS: Oh, I'm sorry.

23 BY MR. CRITTON:

24 Q. Did you ask E.W. during the 20-minute cab
25 ride what the massage was going to consist of?

1 A. No.

2 Q. Okay. When she told you it was a man, did
3 you ask his age?

4 A. No.

5 Q. Did you ask who was going to be present?

6 A. No.

7 Q. Did you ask whether she was going to be
8 present?

9 A. No. I just assumed she was.

10 Q. Okay. Why did you assume she was?

11 A. Because it was both of us going over there.

12 Q. Did she say she was getting paid?

13 A. No. She never told me she was getting paid or
14 how much she was getting.

15 Q. Did you ever come to learn she did get
16 paid?

17 A. I don't know. I wasn't in the room.

18 Q. That's not my question.

19 A. No, I don't know.

20 Q. So you don't know whether E.W. was ever
21 paid any monies whatsoever for coming --

22 A. Yeah, I don't know.

23 Q. -- to the home that day?

24 A. Yeah, I don't know.

25 Q. When E.W. told you that it was, tell him

1 you're older and it was a man, did you then ask any
2 questions and say, wait a minute, who is the person,
3 what's his age, what do I have to do, where are we
4 going?

5 A. No.

6 Q. Who will be there?

7 A. No, I didn't ask any questions.

8 Q. Did you tell her at that time I've never
9 given anyone a massage, you know, I'm not going to
10 know what in the heck to do?

11 A. No.

12 Q. Did you say why am I getting \$200 to give
13 a massage and I have to tell somebody I'm older?

14 A. No, I didn't ask.

15 Q. Okay. Did you think to yourself at that
16 time even though you're in the cab is, you know
17 what, this probably isn't a good idea, I think I
18 won't?

19 A. I don't remember.

20 Q. I don't want to get involved?

21 A. I don't remember what I was thinking, no.

22 Q. Well, you, you could, you realized at any
23 point until basically you started giving a massage,
24 you could have said, sorry, this isn't for me, I
25 want to go home, right?

1 THE WITNESS: I was scared out of my mind
2 once I left, so, no, I didn't ask her anything.

3 BY MR. CRITTON:

4 Q. You could have though, couldn't you?

5 MR. HOROWITZ: Form.

6 THE WITNESS: I couldn't barely speak.

7 BY MR. CRITTON:

8 Q. We'll get, we'll get to that in a minute.
9 Now, so you get, you get to the house, right, or the
10 cab drops you off?

11 A. Yes.

12 Q. Okay. Describe the house for me.

13 A. Big house. We walked to the side, the door.

14 Q. Okay. Go through the side. Did you knock
15 or was it door open?

16 A. No, she walked in.

17 Q. The door was open?

18 A. I don't know. She walked in. The door wasn't
19 wide open. She just walked in.

20 Q. She, she meaning E.W. opened the door?

21 A. Yeah, opened the door and walked in.

22 Q. Okay. And was anyone there?

23 A. I don't remember.

24 Q. And when you opened the door, the two of
25 you went in and what happened next?

1 A. Because I couldn't speak. I just couldn't say
2 anything. I just didn't know what to say.

3 Q. Did she try to talk to you?

4 A. No.

5 Q. Did E.W. say, did you have any problems or
6 was it okay or --

7 A. No, no.

8 Q. Did she say how are you doing or anything?

9 A. No.

10 Q. So, you and E.W. walk from Mr. Epstein's
11 house to CityPlace and neither one of you said one
12 word?

13 A. No.

14 Q. Is that correct?

15 MR. HOROWITZ: Object to the form.

16 THE WITNESS: That's correct.

17 BY MR. CRITTON:

18 Q. Where did you go in CityPlace?

19 A. To some sub-shop or something.

20 Q. And did you get a sandwich?

21 A. No, I just -- she did. She got something, and
22 I just sat there.

23 Q. How long were you in CityPlace?

24 A. I don't know. She made -- it was long enough
25 for her to make a phone call to Melissa and us, for us

1 to find out that Melissa got into a car accident.

2 Q. Were you both planning on going to
3 Melissa's for a birthday party?

4 A. I don't know if she was planning on it, but I
5 was.

6 Q. Okay. So, she called Melissa?

7 A. Yes.

8 Q. So, she was obviously friends with Melissa
9 too?

10 A. I don't, I don't know.

11 Q. Well, she called her.

12 A. Yeah.

13 Q. But she's the one that called Melissa, not
14 you?

15 A. Yeah, I didn't.

16 Q. All right. And she, she got off the phone
17 and she said what?

18 A. She told me that Melissa got into a car
19 accident.

20 Q. And you said.

21 A. I said I was going over there.

22 Q. And did you, in fact, what, how did --
23 what did you and E.W. do then?

24 A. We got on the bus and went to Melissa's.

25 Q. Okay. What, what bus did you get and

1 Q. Have you ever corresponded or conversed
2 with Mr. Epstein or anyone who purported to work for
3 him by e-mail or text message?

4 A. No.

5 Q. Have you ever spoken to him vis-a-vis a
6 computer?

7 A. No.

8 Q. Have you ever spoken to someone who
9 purported to work for him or an agent of his by way
10 of computer or phone, e-mail, text, or otherwise?

11 A. No.

12 Q. During the time that you were at
13 Mr. Epstein's, when you were in the massage room,
14 would it be correct that he never forced you to do
15 anything, did he?

16 MR. HOROWITZ: Form.

17 THE WITNESS: What do you mean by force?

18 BY MR. CRITTON:

19 Q. Did he use any type of physical force?

20 A. Any physical force, no.

21 Q. Okay. Did he ever threaten you in any
22 way?

23 A. No.

24 Q. Did he ever coerce you in any way --
25

1 A. That's fine.

2 Q. And if you've proceeded to answer a
3 question, I will assume that you've understood it
4 and answered it truthfully. Fair?

5 A. Fair.

6 Q. All right. Could you give me your date of
7 birth, please.

8 A. September 3rd, 1990.

9 Q. Which makes you right now you're --

10 A. Nineteen.

11 Q. Nineteen. All right. And are you married
12 at the current time, ma'am?

13 A. No, sir.

14 Q. But you have a relationship?

15 A. Yes.

16 Q. A long-term relationship?

17 A. Yes.

18 Q. And who is that with?

19 A. Aron, A-r-o-n, Ketelaar, K-e-t-e-l-a-a-r.

20 Q. And Mr. Ketelaar is the father of your
21 son; is that correct?

22 A. Yes.

23 Q. What is your son's name?

24 A. Aron, Junior.

25 Q. And do you call him AJ?