

EXHIBIT 21

Page 1 UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE NO. 08-CIV-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 VIDEOTAPED DEPOSITION OF SARAH KELLEN Wednesday, March 24, 2010 10:37 - 6:51 p.m. 250 Australian Avenue South Suite 1500 West Palm Beach, Florida 33401 Reported By: Cynthia Hopkins, RPR, FPR Notary Public, State of Florida Prose Court Reporting Services Job No.: 1484	Page 3 1 IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT 2 IN AND FOR PALM BEACH COUNTY, FLORIDA 3 CASE NO. 502008CA028051XXXXMB AB 4 5 L.M., 6 Plaintiff, 7 -vs- VOLUME I OF III 8 JEFFREY EPSTEIN, 9 Defendant. 10 11 12 VIDEOTAPED DEPOSITION OF 13 SARAH KELLEN 14 15 Wednesday, March 24, 2010 16 10:37 - 6:51 p.m. 17 18 250 Australian Avenue South 19 Suite 1500 20 West Palm Beach, Florida 33401 21 22 Reported By: 23 Cynthia Hopkins, RPR, FPR 24 Notary Public, State of Florida 25 Prose Court Reporting Services Job No.: 1484
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APPEARANCES:

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Appearances continued...

On behalf of the Plaintiff, Jane Doe II:

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ALSO PRESENT:

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Joseph Kozak, Videographer

Prose Court Reporting Services

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EXAMINATION DIRECT CROSS REDIRECT

SARAH KELLEN

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PASSENGER MANIFEST

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PROCEEDINGS

THE VIDEOGRAPHER: We are now on video record. This is Media No. 1 in the videotaped deposition of Sarah Kellen in the matter of Jane Doe versus Jeffrey Epstein, et al. Today is Wednesday, March 24th, 2010. It is 10:36 a.m. We are here at Prose Court Reporting, 250 South Australian Avenue, West Palm Beach, Florida.

My name is Joe Kozak. I'm the videographer. The reporter is Cindy Hopkins from Prose Court Reporting Agency.

Would counsel please introduce yourselves, and then the court reporter will swear in the witness.

MR. KUVIN: Good morning. Spencer Kuvin on behalf of one of the Plaintiffs.

MR. HOROWITZ: Adam Horowitz on behalf of Jane Does 2 through 8. And just for the record purposes, the deposition is also being taken in the federal cases, I believe, case being Jane Doe 2 versus Jeffrey Epstein.

MR. WEISSING: Matt Weissing on behalf of three of the Plaintiffs.

2 (Pages 5 to 8)

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1 BY MR. KUVIN: 2 Q. Have you ever used the alias of 3 Sarah Bonk? 4 MR. RHEINHART: Objection to the -- I'm 5 sorry. Instruct the witness not to answer 6 based on Fifth Amendment privileges. 7 THE WITNESS: Upon the instruction of my 8 lawyer, I must invoke my Fifth Amendment right. 9 BY MR. KUVIN: 10 Q. Do your parents live in North Carolina? 11 MR. RHEINHART: Instruct the witness not 12 to answer the question based on her Fifth 13 Amendment privilege. 14 THE WITNESS: On instruction of my lawyer 15 I must invoke my Fifth Amendment right. 16 BY MR. KUVIN: 17 Q. Do you have any brothers and sisters? 18 MR. RHEINHART: Same instruction as the 19 previous question. 20 THE WITNESS: On the instruction of my 21 lawyer, I must invoke my Fifth Amendment right. 22 BY MR. KUVIN: 23 Q. Have your parents met Jeffrey Epstein? 24 MR. RHEINHART: Objection to the form. 25 Standing objection and also instruct the	1 compound, instruct the witness not to answer. 2 THE WITNESS: On the instruction of my 3 lawyer, I must invoke my Fifth Amendment right 4 BY MR. KUVIN: 5 Q. Have you ever used illegal drugs with 6 Nadia Marcinkova? 7 MR. RHEINHART: Same objection and 8 instruction as to the previous question. 9 THE WITNESS: On the instruction of my 10 lawyer, I must invoke my Fifth Amendment right 11 BY MR. KUVIN: 12 Q. Did you ever use the phone number of 13 655-0995? 14 MR. RHEINHART: Instruct the witness not 15 to answer based on her Fifth Amendment 16 privilege. 17 THE WITNESS: On the instruction of my 18 lawyer, I must invoke my Fifth Amendment right 19 BY MR. KUVIN: 20 Q. Have you ever used the phone number 21 881-8116, 881-8116. 22 MR. RHEINHART: Thank you. 23 THE WITNESS: I don't recognize that 24 number. 25
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1 witness not to answer based on her Fifth 2 Amendment privilege. 3 THE WITNESS: On the instruction of my 4 lawyer, I must invoke my Fifth Amendment right. 5 BY MR. KUVIN: 6 Q. Do your parents know what you've done with 7 Jeffrey Epstein as it relates to this case? 8 MR. RHEINHART: Objection to the form as 9 stated to the previous question, and same 10 instruction. 11 THE WITNESS: On the instruction of my 12 lawyer, I must invoke my Fifth Amendment right. 13 BY MR. KUVIN: 14 Q. Have you ever used illegal drugs with 15 Jeffrey Epstein? 16 MR. RHEINHART: Objection to the form. 17 Standing objection, instruct the witness not to 18 answer. 19 THE WITNESS: On the instruction of my 20 lawyer, I must invoke my Fifth Amendment right. 21 BY MR. KUVIN: 22 Q. Have you ever used illegal drugs with 23 Ghislaine Maxwell? 24 MR. RHEINHART: Objection to the form, 25 assumes knowledge of Ghislaine Maxwell. It's	1 BY MR. KUVIN: 2 Q. Okay. When the police entered Jeffrey 3 Epstein's home, they took something that's called a 4 bottle of Peach Flavored Joy Jelly. Just a 5 foundation of what I'm about to ask you. 6 Have you ever seen anything called Peach 7 Flavored Joy Jelly ever anywhere, first of all? 8 Have you ever seen that before anywhere? 9 MR. RHEINHART: Just so I am clear about 10 your question -- 11 MR. KUVIN: Not necessarily in a home, 12 just anywhere in her entire life has she ever 13 seen a bottle of something called Peach 14 Flavored Joy Jelly. 15 THE WITNESS: No, I have not. 16 BY MR. KUVIN: 17 Q. Okay. Also taken from the home were, was 18 an adult sex toy called a Twin Torpedo which, 19 according to Detective Recarey during his deposition 20 was a double-headed dildo. Not with respect to 21 Mr. Epstein, but in your life, have you ever seen 22 something called a Twin Torpedo or double-headed 23 dildo? 24 A. No, I have not. 25 Q. Also confiscated from the home was soap in

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1 the shape of a penis and vagina. Once again, not 2 necessarily with respect to Mr. Epstein's home, in 3 your entire life have you ever seen soap in the 4 shape of a penis and vagina? 5 A. Not that I recall. 6 Q. Do you ever recall being in Ohio? 7 MR. RHEINHART: Ever in her life? 8 MR. KUVIN: The state, ever in her life. 9 BY MR. KUVIN: 10 Q. Let's start there, recall being in the 11 State of Ohio for any reason? 12 A. Maybe for a layover, but not that I 13 specifically remember. 14 Q. Okay. Do you know an Ivan Robles? 15 A. No. 16 Q. Have you seen a gentleman by the name of 17 Alan Dershowitz at the home of Jeffrey Epstein 18 before? 19 MR. RHEINHART: Objection to the form. 20 Standing objection, presumes knowledge of 21 Jeffrey Epstein or his home. Instruct the 22 witness not to answer. 23 THE WITNESS: On the instruction of my 24 lawyer, I must exercise my Fifth Amendment 25 right.	1 THE WITNESS: On the instruction of my 2 lawyer, I must invoke my Fifth Amendment right 3 BY MR. KUVIN: 4 Q. Do you agree that these corporations that 5 I just mentioned were utilized by Jeffrey Epstein in 6 an attempt to have sexual relationships with 7 underage girls? 8 MR. RHEINHART: Objection to the form as 9 to compound, and also assumes knowledge of 10 Mr. Epstein, asks for more than one answer to 11 the question. I would instruct her not to 12 answer based on her Fifth Amendment privilege 13 because the question assumes knowledge of 14 Mr. Epstein. 15 THE WITNESS: Upon instruction of my 16 lawyer I must invoke my Fifth Amendment right. 17 MR. KUVIN: I think I am done. Hang on 18 one second. 19 All right. I appreciate it. That's all 20 the questions I have at this time. Reserve the 21 right to ask any follow-up questions if other 22 attorneys raise new and different issues by 23 their questioning. 24 MR. RHEINHART: Understood. 25 MR. KUVIN: Pass the witness at this time.
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1 BY MR. KUVIN: 2 Q. Have you ever heard of the El Zorro Ranch 3 Corporation? 4 MR. RHEINHART: Instruct the witness not 5 to answer based on her Fifth Amendment 6 privilege. 7 THE WITNESS: On the instruction of my 8 lawyer I must exercise my Fifth Amendment 9 right. 10 BY MR. KUVIN: 11 Q. Have you ever heard of the New York 12 Strategy Group? 13 MR. RHEINHART: Same instruction. 14 THE WITNESS: On the instruction of my 15 lawyer, I must invoke my Fifth Amendment right. 16 BY MR. KUVIN: 17 Q. Have you ever heard of the Ghislaine 18 Corporation? 19 MR. RHEINHART: Same instruction. 20 THE WITNESS: On the instruction of my 21 lawyer, I must invoke my Fifth Amendment right. 22 BY MR. KUVIN: 23 Q. Have you ever heard of the Financial 24 Strategy Group? 25 MR. RHEINHART: Same instruction.	1 Who wants to go? Mr. Horowitz, do you have a 2 microphone? 3 MR. HOROWITZ: I do. 4 CROSS (SARAH KELLEN) 5 BY MR. HOROWITZ: 6 Q. Ms. Kellen, did you use the telephone 7 number, the (917)855-3363 at any time between 2001 8 and 2006? 9 A. On the advice of my lawyer, I must exercise my 10 Fifth Amendment right. 11 Q. Did you use the telephone number 12 (917)855-3363 between 2001 and 2006 at Jeffrey 13 Epstein's expense? 14 MR. RHEINHART: Objection to the form in 15 that it assumes knowledge of Jeffrey Epstein. 16 Standing objection as previously stated with 17 Mr. Kuvin. Instruct the witness not to answer, 18 based on her Fifth Amendment right. 19 THE WITNESS: On the instruction of my 20 lawyer, I must exercise my Fifth Amendment 21 right. 22 BY MR. HOROWITZ: 23 Q. Did you use the telephone number 24 (917)855-3363 at Jeffrey Epstein's direction? 25 MR. RHEINHART: Same objection as the

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1 So can we focus on the specific questions
2 that she can answer or from which you can draw
3 an adverse inference if asked properly, and
4 let's move it along.

5 MS. EZELL: Each young woman's case is an
6 individual case, and we have the right to ask,
7 ask whatever questions that we need to with
8 regard to each one.

9 MR. RHEINHART: I --

10 MR. GOLDBERGER: Let's just go forward
11 until 5:00 and see where we're at.

12 BY MR. WEISSING:

13 Q. Did you know that Jeffrey Epstein received
14 sexual gratification from directing others to
15 sexually abuse minor children?

16 MR. RHEINHART: Objection to the form.

17 THE WITNESS: On the instruction of my
18 lawyer, I must invoke the Fifth Amendment
19 right.

20 BY MR. WEISSING:

21 Q. Did you know that Jeffrey Epstein received
22 sexual gratification from directing Marcinkova to
23 sexually abuse minor children?

24 MR. RHEINHART: Objection to the form. It
25 assumes knowledge of a person named Marcinkova

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1 THE WITNESS: On the instruction of my
2 lawyer, I must invoke my Fifth Amendment
3 privilege.

4 BY MR. WEISSING:

5 Q. Do you know Alan Dershowitz?

6 MR. RHEINHART: The question was asked and
7 answered about three-and-a-half hours ago.

8 THE WITNESS: On the instruction of my
9 lawyer, I must invoke my Fifth Amendment
10 privilege.

11 BY MR. WEISSING:

12 Q. Do you know David Copperfield?

13 MR. RHEINHART: That question was asked
14 about three-and-a-half-hours ago.

15 THE WITNESS: On the instruction of my
16 lawyer, I must invoke my Fifth Amendment
17 privilege.

18 BY MR. WEISSING:

19 Q. In addition to his place at, in Palm
20 Beach, are you aware that Jeffrey Epstein has an
21 apartment located at 301 East 66th Street, Apartment
22 14G through E in New York?

23 MR. RHEINHART: That question was asked
24 about four hours ago. It's been asked and
25 answered.

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1 It is otherwise compound and objectionable.

2 THE WITNESS: On the instruction of my
3 lawyer, I must invoke my Fifth Amendment right.

4 MR. WEISSING: Let's go off the record for
5 a moment.

6 THE VIDEOGRAPHER: Are we all good with
7 going off the record?

8 MR. RHEINHART: Yeah, that's fine.

9 MR. HOROWITZ: Yes.

10 THE VIDEOGRAPHER: We're now off the
11 record at 4:22 p.m.

12 (A brief recess was held.)

13 THE VIDEOGRAPHER: We are now on the
14 record. It is 4:24 p.m.

15 BY MR. WEISSING:

16 Q. Do you know Nadia Marcinkova?

17 MR. KUVIN: Marcinkova.

18 THE WITNESS: On the instruction of my
19 lawyer, I must invoke my Fifth Amendment
20 privilege.

21 BY MR. WEISSING:

22 Q. Do you know -- have you procured minor
23 children to have sexual relations with
24 Nadia Marcinkova at Jeffrey Epstein's mansion?

25 MR. RHEINHART: Objection to the form.

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1 THE WITNESS: At the instruction of my
2 lawyer, I invoke my Fifth Amendment privilege.

3 BY MR. WEISSING:

4 Q. While in New York, have you procured
5 underage minor children to engage in sexual acts
6 with Jeffrey Epstein at that location?

7 MR. RHEINHART: Object to the form.

8 THE WITNESS: On the instruction of my
9 lawyer, I must invoke my Fifth Amendment
10 privilege.

11 BY MR. WEISSING:

12 Q. With regard to the minor children procured
13 for him at that location, were they school children
14 in the New York area?

15 MR. RHEINHART: The previous question,
16 objection to the form. The same as all the
17 previous questions, it assumes a fact that's
18 not been established. It can't fairly be
19 answered.

20 THE WITNESS: On the instruction of my
21 lawyer, I must invoke my Fifth Amendment
22 privilege.

23 BY MR. WEISSING:

24 Q. Did Jeffrey Epstein have sexual encounters
25 with underage people while at that apartment?

33 (Pages 315 to 318)

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1 know what the Edge Group was, but whatever, you can
2 answer the question.
3 THE WITNESS: At the instruction of my lawyer,
4 I must choose to invoke my Fifth Amendment right.
5 BY MS. EZELL:
6 Q. Do you know Max Brockman?
7 MR. REINHART: I'm sorry, can you repeat?
8 BY MS. EZELL:
9 Q. Do you know a Max Brockman?
10 MR. REINHART: I believe that was asked and
11 answered already, but --
12 THE WITNESS: At the instruction of my lawyer,
13 I must invoke my Fifth Amendment right.
14 BY MS. EZELL:
15 Q. Have you ever been photographed with Max
16 Brockman at an Edge Science dinner?
17 A. At the instruction of my lawyer, I must invoke
18 my Fifth Amendment right.
19 MR. REINHART: You should let me -- I need to
20 object to the form of the question first, but go
21 ahead. I know we all want to get out of here. Go
22 ahead.
23 THE WITNESS: Say it again.
24 MR. REINHART: No, you are okay. Go ahead,
25 Ms. Ezell. Thank you.

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1 BY MS. EZELL:
2 Q. Do you know whether Jeffrey Epstein attended
3 the Edge Science dinner in Monterey, California?
4 MR. REINHART: Objection to the form, lack of
5 foundation. Instruct the witness not to answer.
6 THE WITNESS: At the instruction of my lawyer,
7 I must invoke my Fifth Amendment right.
8 BY MS. EZELL:
9 Q. You testified a moment ago that you were
10 photographed nude by your boyfriend or a former
11 boyfriend and that you hoped there are no photographs
12 disseminated elsewhere.
13 At what age were those photographs taken?
14 MR. REINHART: I'm going to instruct her not
15 to answer that. It has nothing to do with
16 anything. It's not reasonably calculated to lead
17 to discoverable evidence. We can move on.
18 BY MS. EZELL:
19 Q. Were you in any way damaged by that
20 experience?
21 MR. REINHART: Same instruction. Let's move
22 on.
23 BY MS. EZELL:
24 Q. Do you have any regrets?
25 MR. REINHART: Same instruction. Move on.

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1 BY MS. EZELL:
2 Q. Do you want to respond? I didn't give you
3 time.
4 MR. REINHART: I've instructed her not to
5 answer the question. Let's move on.
6 BY MS. EZELL:
7 Q. Do you recall a dinner at El Brillo Way
8 attended by David Copperfield where Jane No. 103 was a
9 guest?
10 MR. REINHART: Objection to the form, lack of
11 foundation, and a standing objection as to her
12 knowledge of anything involving El Brillo Way or
13 Jeffrey Epstein. Instruct her not to answer.
14 THE WITNESS: At the instruction of my lawyer,
15 I must invoke my Fifth Amendment right.
16 BY MS. EZELL:
17 Q. What is the relationship between Jeffrey
18 Epstein and David Copperfield?
19 MR. REINHART: Objection to form, lack of
20 foundation as to her knowledge of either one of
21 those people. Instruct her not to answer.
22 THE WITNESS: At the instruction of my lawyer,
23 I must invoke my Fifth Amendment right.
24 BY MS. EZELL:
25 Q. To your knowledge, do they recruit girls for

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1 one another?
2 MR. REINHART: Object to the form, compound,
3 and again, lack of foundation. Instruct her not to
4 answer.
5 THE WITNESS: At the instruction of my lawyer,
6 I must invoke my Fifth Amendment right.
7 BY MS. EZELL:
8 Q. To your knowledge, are they involved in any
9 sexual trafficking of young women?
10 MR. REINHART: Object to the form for the
11 reasons previously stated. Also calls for a legal
12 conclusion as to what sexual trafficking is.
13 Instruct her not to answer.
14 THE WITNESS: At the instruction of my lawyer,
15 I must invoke my Fifth Amendment right.
16 BY MS. EZELL:
17 Q. I believe you asked about Allen Dershowitz
18 earlier.
19 MR. REINHART: Twice.
20 BY MS. EZELL:
21 Q. And were instructed not to answer.
22 MR. REINHART: Twice.
23 BY MS. EZELL:
24 Q. All right. I'm going to ask again on behalf
25 of my client. Are you aware of the friendship between

18 (Pages 433 to 436)

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1 Allen Dershowitz and Jeffrey Epstein?

2 MR. REINHART: And for the third time, I'll
3 object to the form and instruct her not to answer
4 the question.

5 THE WITNESS: For the third time, I take the
6 advice of my lawyer and invoke my Fifth Amendment
7 right.

8 BY MS. EZELL:

9 Q. When Allen Dershowitz comes to Palm Beach, he
10 stays at the El Brillo mansion, doesn't he?

11 MR. REINHART: Objection to the form. There
12 is no foundation for her having any knowledge of
13 anything having to do with a person by the name of
14 Allen Dershowitz. I instruct her not to answer.

15 THE WITNESS: At the instruction of my lawyer,
16 I must invoke my Fifth Amendment right.

17 BY MS. EZELL:

18 Q. When Allen Dershowitz, or has Allen Dershowitz
19 ever been there when young ladies came to give massages?

20 MR. REINHART: Same objection stated to the
21 previous question. Same instruction.

22 THE WITNESS: At the instruction of my lawyer,
23 I must invoke my Fifth Amendment right.

24 BY MS. EZELL:

25 Q. Has Allen Dershowitz ever been the beneficiary

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1 of those massages?

2 MR. REINHART: Same objection and same
3 instruction.

4 THE WITNESS: At the instruction of my lawyer,
5 I must invoke my Fifth Amendment right.

6 BY MS. EZELL:

7 Q. Do you know John Casablanca?

8 A. Never heard that name before.

9 Q. Have you ever heard of a world-famous
10 illusionist whose stage name is David Copperfield?

11 MR. REINHART: That's also been asked at least
12 three times. I'll instruct her again not to answer
13 the question.

14 THE WITNESS: At the instruction of my lawyer,
15 I must invoke my Fifth Amendment right.

16 BY MS. EZELL:

17 Q. Have you ever gone to one of David
18 Copperfield's shows?

19 MR. REINHART: Objection to form, lack of
20 foundation as to knowledge of any person by the
21 name of David Copperfield. Instruct her not to
22 answer.

23 THE WITNESS: At the instruction of my lawyer,
24 I must invoke my Fifth Amendment right.
25

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1 BY MS. EZELL:

2 Q. Do you know that when David Copperfield is in
3 town, he gives Jeffrey Epstein tickets and Jeffrey gives
4 some to young women to attend those shows?

5 MR. REINHART: Object to the form, multiple,
6 compound question, and a complete lack of
7 foundation. Instruct the witness not to answer.

8 THE WITNESS: At the instruction of my lawyer,
9 I must invoke my Fifth Amendment right.

10 BY MS. EZELL:

11 Q. And do you know that those girls are invited
12 back stage after the show?

13 MR. REINHART: Same objection, complete lack
14 of foundation, and standing objection previously
15 stated.

16 THE WITNESS: At the instruction of my lawyer,
17 I must invoke my Fifth Amendment right.

18 BY MS. EZELL:

19 Q. Do you remember on or about, in or about March
20 of 2005 having conversations with one of the young women
21 who came to the house to give massages about her
22 conversations with Jane No. 103?

23 MR. REINHART: Objection to the form, standing
24 objection, lack of foundation. Instruct the
25 witness not to answer, because the question implies

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1 that she has any knowledge at all of El Brillo Way.

2 BY MS. EZELL:

3 Q. Same question -- sorry.

4 A. At the instruction of my lawyer, I must choose
5 to invoke my Fifth Amendment privilege.

6 Q. Same question as to March of 2006.

7 MR. REINHART: Same objection and same
8 instruction.

9 THE WITNESS: At the instruction of my lawyer,
10 I must choose to invoke my Fifth Amendment
11 privilege.

12 BY MS. EZELL:

13 Q. Do you have any recollection of a conversation
14 in which one of the young women told Jane No. 103 that
15 those girls who, those girls who would help Jeffrey in
16 regard to the investigation would be compensated and
17 those who would not or who would hurt him in the
18 investigation would be dealt with?

19 MR. REINHART: Objection to the form, lack of
20 foundation, compound question. Instruct the
21 witness not to answer, because the question implies
22 some knowledge of anything relating to a person by
23 the name of Jeffrey Epstein.

24 THE WITNESS: At the instruction of my lawyer,
25 I must invoke my Fifth Amendment right.

19 (Pages 437 to 440)