

NOTES OF QUOTES AND STATEMENTS FROM DEPOSITION TRANSCRIPTS

I. Deposition of [REDACTED]

Although [REDACTED] has sought in her civil case against Epstein to portray herself as an innocent, who was damaged by her interactions with Epstein, both her behavior and her own sworn statements during the course of her deposition in her civil case belie her claims. Repeatedly throughout the course of her deposition, [REDACTED] engaged in the frequent use of profanity and personal attacks on Epstein's counsel. For example, during her deposition, [REDACTED] made the following comments:

A: You're an asshole.

Q: You were a –

A: You're a fucking asshole.

(see Depo Transcript 130:10-19)

A: You are just fucking sitting here making money.

(see Depo Transcript 132:9-10)

Q: Ok, you were partying, right?

A: Yeah, like normal people do like you're going to probably do after this with all your fucking money.

(see Depo Transcript 133:3-5)

Q: ... Let's be honest.

A: Okay. Let's be honest.

Q: Did you ever send?

A: Yeah Jackass. You're a fucking asshole.

(see Depo Transcript 225:19-23)

In fact, [REDACTED] use of profanity was so egregious and disruptive during her deposition that the court agreed to extend her deposition for six hours and ordered her attorney to caution [REDACTED] against engaging in such further inappropriate behavior:

But the witness should be warned that the Court will not tolerate any further vulgarities, any further accusations without merit relative to counsel, any further attacks on counsel, any references to counsel's children or anything of that nature.

...

I will allow the deposition ... without interruptions of the same type that we witnessed by virtue of my reading of this transcript on several occasions now, to last another six hours, total. Period.

...

I want to put on record that the vulgarities, the attacks on counsel, the attacks of a personal nature that were communicated by [REDACTED] were such that, if they are repeated, that sanctions will be assessed, and those sanctions could include the striking of the pleadings.

(see November 3, 2009 Hearing Transcript 9:20-10:23)

In addition to her "vulgar" behavior during her deposition, [REDACTED] admitted during the deposition that [REDACTED]

[REDACTED] (see Depo Transcript 304:19-22). She admitted under oath that [REDACTED] (see Depo Transcript 109:17-18). She also admitted that she did [REDACTED]

[REDACTED] (see Depo Transcript 86:12-15) She testified that she started [REDACTED]

[REDACTED] (see Depo Transcript 86:22-24) She admitted, however, that Epstein never provided [REDACTED] with any drugs or alcohol:

Q: Jeffrey Epstein never gave you any drugs did he?

A: No.

Q: He was an antidrug person, wasn't he?

A: That's what he said.

Q: And he made that pretty clear to you?

A: Yes.

Q: Never gave you alcohol, right?

A: Never.

Q: Told you he didn't believe in alcohol. Didn't drink it himself, right?

A: True.

Q: Always treated you well when you were at his house, didn't he?

...

A: Of course.

(see Depo Transcript 305:5-306:1)

[REDACTED] also testified under oath that she and her friend [REDACTED]

Q: Okay, when you thought [REDACTED] at what [REDACTED]?

A: We both went to [REDACTED]

...

A: When we were, when we were [REDACTED] we went there like once or twice.

...

Q: So, you went in there at age [REDACTED] with her? Were you [REDACTED] at the time?

A: Yes. She might have been [REDACTED] I was maybe just turned [REDACTED]

...
Q: What did you do [REDACTED]
A: I was an [REDACTED]
...
Q: And then when you say you were [REDACTED] what did you do?
A: [REDACTED]
Q: [REDACTED]
A: Yes.
Q: [REDACTED]
A: Yes.
...
Q: Did you do [REDACTED]
A: [REDACTED]
Q: [REDACTED]
A: Yes.
(see Depo Transcript 299:2-300:21)

[REDACTED] also testified that she "probably" told Epstein that she worked at that [REDACTED]
(see Depo Transcript 300:3-4)

[REDACTED] also admitted that she was a [REDACTED] She testified at her deposition: [REDACTED] (see Depo Transcript 156:7), [REDACTED] (see Depo Transcript 156:12-13), and "I was a [REDACTED] (see Depo Transcript 280:16-19). In fact [REDACTED] more from [REDACTED]

[REDACTED]

...
Q: Was it more than ten?
A: Maybe.
Q: Was it more than 20?
A: Maybe.
(see Depo Transcript 157:11-159:6).

[REDACTED] also admitted under oath to [REDACTED]
[REDACTED]
(see Depo Transcript 59:13-64:12), including a book of [REDACTED] that she obtained from a [REDACTED] store (see Depo Transcript 152:1-14).

█████ attempted to lay blame on Epstein during her deposition for, among other things, █████ (see Depo Transcript 129:5-23). Yet █████ admitted that she never had sexual intercourse with Epstein and never touched Epstein's penis:

Q: You never had sexual intercourse with Mr. Epstein, did you?

A: Penis inserted into the vagina, no.

Q: Did he ever insert his penis into your mouth?

A: No.

Q: Did he ever insert his penis into your anus?

A: No.

Q: Did he ever insert his penis into your vagina?

A: No.

...

Q: Did you ever hold his penis in your hand?

A: No.

(see Depo Transcript 71:15-72:9)

Moreover, sworn deposition testimony from █████ the person who first brought █████ to Epstein's home, indicates that █████ before █████ ever met Epstein. In her deposition, █████ testified that on █████ second visit to Epstein's home, █████ testified that █████ and █████ testified that █████ was "telling [Epstein] about some stuff that █████ or some stuff like that" (see Depo Transcript of C.M.A. 280:9-11) and that █████ was "offering information" to Epstein:

A: █████
█████ Something of that matter. . .

Q: █████

A: Yeah.

(see Depo Transcript of C.M.A. 276:16-277:11)

II. Deposition of █████

Another woman claiming in her civil case to have lost her innocence to Epstein is █████ Yet █████ sworn deposition testimony in her civil case against Epstein paints quite a different picture. █████ who during her deposition appeared at times █████ testified under oath to a █████ For example:

Q:

A: Yes, I have.

Q:

A:

...

Q:

A:

...

Q:

A: Yeah...

(see Depo Transcript 87:11-88:8).

[REDACTED] admitted that she began [REDACTED] before she ever met Epstein (see Depo Transcript 274:11-13). In addition, she testified:

Q:

A:

Q:

A:

(see Depo Transcript 274:14-19)

She further admitted that she [REDACTED]

[REDACTED] (see Depo Transcript 97:14-20). She also testified that "I told [REDACTED] (see Depo Transcript 271:20-23).

Like [REDACTED] confirmed under oath that Epstein never gave or even offered her drugs or alcohol:

Q: Mr. Epstein never gave you any drugs, did he?

A: No.

(see Depo Transcript 103:8-10)

Q: He never told you to use drugs in his house, did he?

A: No, he never told me to.

Q: He never gave you alcohol in his house, did he?

A: No.

(see Depo Transcript 106:7-12)

Q: He never attempted to drug you in any manner, did he?

A: No.

Q: Never even offered you drugs, correct?

A: Correct.

(see Depo Transcript 131:13-17)

In addition to her [REDACTED] also admitted in her deposition that she had a [REDACTED] well before she ever met Epstein:

Q: So, by, by your acknowledgement in these answers to interrogatories before you ever went to Mr. Epstein's house the first time [REDACTED]

[REDACTED] and [REDACTED] and –

A: And that's it.

Q: And [REDACTED]

A: No.

Q: Not [REDACTED]?

A: Yes.

(see Depo Transcript 258:6-16)

Q: Okay. And when was the [REDACTED]

A: [REDACTED]

Q: [REDACTED]

A: [REDACTED]

(see Depo Transcript 161:18-22)

[REDACTED]

Q: [REDACTED]

A: [REDACTED]

...

Q: [REDACTED]

A: [REDACTED]

Q: [REDACTED]

A: [REDACTED]

...

Q: Was this before or after the point in time that you had your [REDACTED]

A: It was after. Well, it was before. I don't – It was like during type of thing. [REDACTED]

...

Q: [REDACTED]

A: Yes.

Q: [REDACTED]

A: [REDACTED]

Q: [REDACTED]

A: [REDACTED]

(see Depo Transcript 200:25-202:5)

[REDACTED] testified that [REDACTED] (see Depo Transcript 204:10-11). [REDACTED]

Q: When did you first meet [REDACTED]

A: When I was [REDACTED]

Q: Did you [REDACTED] before you first went to Mr. Epstein's?

A: Yes.

Q: [REDACTED]

A: Yes.

Q: [REDACTED]

A: Yes.

Q: [REDACTED]

A: [REDACTED]

Q: And did you consider [REDACTED]

A: Yeah.

Q: [REDACTED] during the entire period of time that you went to Mr. Epstein's

A: Yeah.

Q: And did [REDACTED] ever physically bring you to Mr. Epstein's house?

A: Yes.

...

Q: ... Ever any occasion when [REDACTED] brought any females that he dropped off at Mr. Epstein's other than -

A: Yes, me and [REDACTED] and me and [REDACTED]

(see Depo Transcript 207:20-209:17)

[REDACTED] testified about having a [REDACTED]

For example:

A: [REDACTED]

[REDACTED]

Q: [REDACTED]

A: [REDACTED]
(see Depo Transcript 258:22-259:4)

Q: For approximately how long did the event take place that [REDACTED]

A: [REDACTED]

Q: [REDACTED]

A: Yep.
(see Depo Transcript 260:24-261:4)

Q: Was there another occasion that [REDACTED] was [REDACTED]

A: Yes.

Q: When was that?

A: [REDACTED]
(see Depo Transcript 261:15-19)

Epstein even counseled [REDACTED]
[REDACTED]

Q: And when did you tell Mr. Epstein about it?

A: On one of the occasions I went to his house.

Q: And what did he say?

A: I don't know. He talked to me about it.

Q: Was he sympathetic toward you?

A: A little bit.

Q: [REDACTED]

A:

Q:

A:

(see Depo Transcript 262:5-17)

Despite [REDACTED]
meeting Epstein and [REDACTED]
[REDACTED] that predated her interactions with Epstein [REDACTED] claims
injury by Epstein in her civil case. She makes these claims even though she made
the following admissions in her deposition:

Q: Did you ever have sexual intercourse with Mr. Epstein?

A: No.
(see Depo Transcript 106:13-15)

Q: Did you ever touch Mr. Epstein's penis –

A: No.

Q: -- in any way?

A: No, no.

(see Depo Transcript 109:1-4)

Q: All right. Would you, would you say that during the period from [REDACTED] Mr. Epstein was good to you?

A: Yes.

(see Depo Transcript 127:23-128:1)

Q: Did he ever, did he ever strike you ever, hit you?

A: No.

...

Q: Did he ever commit an act of domestic violence against you?

A: No.

(see Depo Transcript 129:2-10)

Q: ... Did Mr. Epstein ever threaten you in any manner?

A: No.

(see Depo Transcript 131:2-4)

In fact, [REDACTED] testified that she enjoyed going to Epstein's home:

Q: Did you enjoy the occasions when you went to Mr. Epstein's?

A: Yes. Like enjoyed collecting the money, yes.

Q: Well, you enjoyed what you were doing, didn't you? You enjoyed spending time with him?

A: Not exactly spending time with him. I enjoyed going to be able to collect that much money.

(see Depo Transcript 141:10-16)

[REDACTED] enjoyed collecting the money so much that she, herself, initiated contact in order to schedule visits to collect that money:

Q: Well, there were also occasions when no one from Mr. Epstein called, but rather you called Mr. Epstein's and asked to go?

A: Yes.

Q: And that was because you wanted to go and earn some money, correct?

A: Yes.
(see Depo Transcript 137:7-13)

Nevertheless [REDACTED] claimed in her deposition that specifically because of her interactions with Epstein:

A: I have a very hard time working around older men or in specific situations.
Q: What situations would those be?
A: I don't trust anybody and I don't feel safe in some places.
Q: Well, you say you don't trust anybody?
A: Well, I don't trust men.
Q: What—any kind of particular kind of men or just –
A: Older men.
Q: And what's your definition of "older"?
A: Above 40.
(See Depo Transcript 66:10-21)

Yet, despite her claimed "trust" issues with men over 40 years old, [REDACTED] admitted under oath at her deposition that, after she stopped seeing Epstein:

A: I was working for an [REDACTED]
Q: And what was the name of that [REDACTED]
A: [REDACTED]
Q: That would be two separate [REDACTED]
A: Yes.
(see Depo Transcript 68:12-18)

Q: And thereafter, [REDACTED]
[REDACTED]
A: Yes.
(See Depo Transcript 75:21-24).

Incredulously [REDACTED]
[REDACTED]
[REDACTED] (see Depo Transcript 75:18-19).
[REDACTED] (see Depo Transcript 84:5-10).
[REDACTED]

Q: [REDACTED]

A: Yes.

Q: [REDACTED]

A: Yes, that's true.

(see Depo Transcript 67:15-20)

and

Q: [REDACTED]

A: Yeah.

(see Depo Transcript 82:12-16)

III. Deposition of [REDACTED]

Although [REDACTED] also claimed in her civil case injury from her interactions with Epstein, her sworn deposition testimony clearly establishes that any injuries that

[REDACTED]
been interacting with Epstein:

Q: Now, read to the ladies and gentlemen of the jury what you wrote occurred on [REDACTED], 2004 with [REDACTED]

A: [REDACTED]
phone [REDACTED]
[REDACTED]

Q:

A:

(see Depo Transcript 357:6-360:4)

[redacted] admitted under oath that [redacted]
[redacted] (though her admissions during the deposition
indicate that it was earlier than that):

Q: Now, it's a fact, is it not, that by the beginning of your [redacted] by

A: Yeah.

(see Depo Transcript 180:7-11)

Q:

A:

Q:

A:

Q:

(see Depo Transcript 181:21-182:2)

Q: Are you – did you –

A: Yeah.

(see Depo Transcript 183:19-21).

[redacted]
[redacted] was then a [redacted]
[redacted]

Q:

A: When I was

Q: [redacted] when you first started dating him,
right?

A: Yes, somewhere in that time – I'm pretty sure it's somewhere in that
time frame.

(see Depo Transcript 198:3-11)

A:

(see Depo Transcript 199:17-21)

[REDACTED]

[REDACTED]

Q: [REDACTED]

A: Yeah.

...

Q: [REDACTED]

[REDACTED]

...

A: [REDACTED]

(see Depo Transcript 202:10-22)

Nevertheless

[REDACTED]

A: I have made a [REDACTED]

...

Q: ... what did this [REDACTED]

A: [REDACTED]

Q: [REDACTED]

A: [REDACTED]

Q: [REDACTED]

A: [REDACTED]

Q: [REDACTED]

A: [REDACTED]

(see Depo Transcript 226:11-227:7)

Q: When you made the [REDACTED]

[REDACTED]

A: [REDACTED]

Q: [REDACTED]

A: [REDACTED]

...

Q: [REDACTED]

A: Yeah.

Q:

A: Yeah.

Q:

A:

Q:

A:

Q:

A:

...

Q: Tell the ladies and gentlemen, look in the camera and tell the ladies and gentlemen of the jury

...

A:

...

Q:

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

...

Q:

A:

Q:

A:

(see Depo Transcript 324:24-325:10)

Q:

A:

Q:

A:

Q:

A:

Q:

...

A: One of those two.

(see Depo Transcript 326:23-327:9)

Q:

...

A: Three.

(see Depo Transcript 299:16-21)

Q:

A:

Q:

...

A:

Q:

A:

(see Depo Transcript 311:7-21)

Q:

A:

Q:

A:

(see Depo Transcript 312:23-313:1)

Q:

[REDACTED]

...

Q: Is that right?

A: Yeah.

(see Depo Transcript 426:9-16)

[REDACTED]

...

A: Yeah, probably.

(see Depo Transcript 213:11-25)

[REDACTED]

Q: Okay. And it was – it was when you were 17, between the ages of 17 and 18?

A: Uh-huh.

[REDACTED]

(see Depo Transcript 25:17-26:1)

[REDACTED]

Q: You had [REDACTED] before you met Mr. Epstein, had you not?

A: Yeah.

(see Depo Transcript 221:3-5)

Q: I want to ask you again, did you ever do [REDACTED]

[REDACTED]

A: Yeah.

[REDACTED]

(see Depo Transcript 214:24-215:4)

Q: [REDACTED]

A: [REDACTED]

(see Depo Transcript 217:4-6)

Q: [REDACTED]

A: [REDACTED]

(see Depo Transcript 217:19-23)

[REDACTED] has attempted to blame Epstein for any injuries she claims to have sustained during the period [REDACTED]

[REDACTED] "Don't tell [Epstein] your age" (see Depo Transcript 62:17-22). Moreover, [REDACTED]

Q: Didn't have any sexual relations with Mr. Epstein did you?

A: No.

(see Depo Transcript 180:12-14)

Q: And by the way, did you – did you ever touch Mr. Epstein's penis?

A: No.

(see Depo Transcript 361:5-7)

Q: Did he ever physically hurt you in any manner whatsoever?

A: No.

Q: Did he ever demean you in any manner whatsoever?

...

A: No.

(see Depo Transcript 169:16-25)

Q: Mr. Epstein never gave you drugs, correct?

A: No.

(see Depo Transcript 221:12-14)

And [REDACTED] admitted during her deposition:

Q: Was Mr. Epstein good to you?

A: Yeah.

(see Depo Transcript 122:9-10)

Q: And Mr. Epstein, as you said before lunch, was very nice towards you, was he not?

A: Yeah.

...

A: He was really nice, like friendly.

(see Depo Transcript 168:9-20)

In fact, [REDACTED] admitted that from the period of time after she was of legal age and legally deemed able to make her own decisions regarding her interactions with Epstein, she voluntarily saw Epstein as much as 50 times:

Q: Can you tell me how many times you went to Mr. Epstein's between [REDACTED]

...

A: Well, approximately, approximately like 30 to 50 times.

...

Q: Okay. You went voluntarily. Nobody forced you to go to Mr. Epstein's, correct?

...

A: Yeah.

(see Depo Transcript 77:17-79:4)

Moreover, [REDACTED] admitted under oath that when [REDACTED] first learned of the claims against Epstein and before she filed her law suit against Epstein, [REDACTED] "was like defending Mr. Epstein" (see Depo Transcript 276:2), and that [REDACTED] and her friend [REDACTED] discussed and told others that such claims were outrageous:

Q: Did you ever, at any point in your life right up until today tell anyone that you thought it was outrageous that anyone would file a lawsuit against Jeffrey Epstein because everybody knew what the deal was and knew what they were doing or words to that effect?

...

A: Yeah, I said that to [REDACTED] because I didn't even think I was doing anything wrong at the time...

...

A: We, she said we both said to each other. We were just, like, I can't believe this is happening, like Jeffrey is such a great guy, like, you know, like, saying all this stuff about, about him...

(see Depo Transcript 275:18-277:2)

Q: All right. Now, isn't it a fact that you have made this statement to people other than [REDACTED] between January of '06 and January of '09, that everybody that went to see Jeffrey Epstein knew exactly what they were

getting into, did it voluntarily, and it's outrageous that they would sue him?

...

A: Yeah.

...

Q: Now, I want to tell you that you filed your lawsuit in 2008. Okay. You can assume and I'm sure your counsel will correct me if I'm wrong, but you didn't file this lawsuit until 2008. You had a lot of conversations with your friends that had gone to Jeffrey Epstein before you filed this lawsuit, didn't you?

...

A: Yeah.

Q: And all those conversations were that everybody knew what they were getting into, and it was all done voluntarily, and at that time you-all thought it was crazy that anybody would sue Jeffrey Epstein, didn't you?

...

A: Yeah.

(see Depo Transcript 282:8-25)

Finally [REDACTED] also admitted that even after the police contacted her when she was in college and of legal age, but before she had retained legal counsel in her civil case, she "probably more than likely" would have continued to see Epstein. See Depo Transcript 393:10-16.

[REDACTED] claims against Epstein defy credibility. She was consistently evasive during her deposition. She admitted in her deposition to lying under oath and to lying in evaluation interviews with her own experts, including about such things as [REDACTED] (see Depo Transcript 402:22-403:2) and [REDACTED] (see Depo Transcript 405:2-406:9). Most tellingly [REDACTED] admitted:

Q: So, we don't really know, even when you're under oath, whether you're telling the truth or you're lying, do we?

A: No.

(see Deposition Transcript 401:7-10)

In light of her admitted [REDACTED] the entire period that she claims to have been interacting with Epstein, her evasive responses to direct deposition questions, her admitted deceptions to her own experts, her revelation that her testimony cannot be relied upon, even under oath, her admissions regarding her positive personal feelings about Mr. Epstein and her pre-litigation characterization of the civil claims against Epstein as outrageous, [REDACTED] civil claims of injury by Epstein do not withstand scrutiny.