

# EXHIBIT 5 PART 3

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1 THE WITNESS: I'd like to answer every one of  
2 the claims of your clients today. However, my  
3 attorneys have counseled me that today at least,  
4 that I must simply assert my Fifth, Sixth and  
5 Fourteenth Amendment Right.

6 BY MR. HOROWITZ:

7 Q At any time prior to 2005 did you instruct S.K.  
8 -- strike that.

9 At any time prior to 2005 did you instruct S.K.  
10 to communicate with H.R. by telephone to arrange for  
11 Jane Doe 7 to come to your home for a massage in which  
12 you would pay her money?

13 MR. PIKE: Form.

14 THE WITNESS: I would very much like to answer  
15 each and every question you've asked me here today,  
16 but like many of your other questions, I am going  
17 to have to assert my Fourteenth -- excuse me --  
18 Fourteenth, Fifth and Sixth Amendment Rights as  
19 advised by my counsel. Though I choose and prefer  
20 to answer that question, my attorney said that if I  
21 do so, I risk losing their counsel and waiving  
22 those rights.

23 BY MR. HOROWITZ:

24 Q Did you inform S.K. that the massage Jane Doe 7  
25 was to give you would be sexual in nature?

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1 MR. PIKE: Form.

2 THE WITNESS: I'm sure the claims of sexual --  
3 the claims -- the sexual claims made by your  
4 client, Jane Doe 7, that would give me great  
5 pleasure to answer with specificity. However,  
6 today, I may -- I cannot do so on advice of my  
7 counsel who's instructed me to assert my Fifth,  
8 Sixth and Fourteenth Amendment Right. He told me  
9 that if I choose to answer those questions, which  
10 is my preference, that I would risk losing his  
11 representation and waiving those rights.

12 BY MR. HOROWITZ:

13 Q Did you observe S.K. speaking with H.R. by  
14 telephone while making arrangements for Jane Doe 7 to  
15 come to your home for a massage?

16 MR. PIKE: Form.

17 THE WITNESS: I would very much like to answer  
18 each and every one of your questions today  
19 especially with respect to Jane Doe 7 and her  
20 claims. However, today, on advise of my counsel,  
21 they've asked me to assert my Fourteenth, Sixth and  
22 Fifth Amendment Rights. So, though I'd prefer to  
23 answer those questions, I'm told that if I choose  
24 to do so, I risk losing their representation and  
25 waiving those rights.

1 BY MR. HOROWITZ:

2 Q At any time prior to May 2005 did you confirm  
3 with S.K. that she had spoken to Jane Doe 7 by telephone  
4 and that Jane Doe 7 would be coming to your home to give  
5 you a massage?

6 MR. PIKE: Form.

7 THE WITNESS: I'd very much like to answer  
8 every one of Jane Doe 7's claims with specificity,  
9 but unfortunately, like many of your other  
10 questions today, Mr. Horowitz, my attorneys have  
11 counseled me that I may not answer any questions  
12 that may be relevant to a lawsuit, or any of your  
13 lawsuits.

14 Unfortunately, your partner after he filed this  
15 lawsuit was suspended by the Florida Bar, so he's  
16 not here. Mr. Edwards's partner, who sits in jail,  
17 is not here. So these claims of a sexual nature  
18 would give me great pleasure to be able to answer  
19 with specificity, but I'm told that if I choose to  
20 do so today, my -- I risk losing the representation  
21 of my counsel and waiving my rights.

22 BY MR. HOROWITZ:

23 Q Was it your intent during the course of Jane  
24 Doe 7's visit to your home, that you would either  
25 persuade, induce or entice her to engage in sexual

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1 activity with you?

2 MR. PIKE: Form.

3 THE WITNESS: I'd very much like to answer  
4 every one of Jane Doe 7's claims with respect to  
5 any sexual nature of any of her claims. However,  
6 my attorneys have counseled me that today at least,  
7 I may not, and must assert my rights under the  
8 Fifth, Fourteenth and Sixth Amendment. And though  
9 I'd prefer to answer those questions, they've told  
10 me that if I choose to do so, I risk losing those  
11 rights and their representation.

12 BY MR. HOROWITZ:

13 Q During the course of Jane Doe 7's visits to  
14 your home, did you succeed in persuading, inducing or  
15 enticing her to engage in sexual activity with you?

16 MR. PIKE: Form.

17 THE WITNESS: Mr. Horowitz, I'd like to answer  
18 each and every one of your questions posed here  
19 today, but like most of the other questions, I am  
20 going to have to answer the same way because my  
21 attorneys have counseled me that I must assert my  
22 Fifth, Sixth and Fourteenth Amendment Rights.  
23 Though I prefer to answer those questions, and I'd  
24 be -- much prefer the fact to answer it to your  
25 partner who filed this claim against me, but he's

11 (Pages 230 to 233)

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<p>1 been suspended since filing a claim by the Florida 2 bar. 3 I would also like to speak directly to 4 Mr. Edwards' partner, but he's in jail for 5 falsifying claims of a sexual nature against 6 wealthy people, stealing investors' monies and from 7 people in South Florida, and Mr. Edwards' firm 8 being accused by the U.S. Attorney of being a 9 criminal enterprise, and perpetrating one of the 10 largest frauds in South Florida histories by just 11 these types of cases. 12 BY MR. HOROWITZ: 13 Q Mr. Epstein, you asked Jane Doe 7 how old she 14 was in 2003; isn't that right? 15 MR. PIKE: Form. 16 THE WITNESS: I would like to answer each and 17 every one of your questions, Mr. Horowitz. 18 However, today, my attorneys have counseled me that 19 I may not answer any questions that may be relevant 20 to any of your lawsuits, so I must assert my Fifth, 21 Sixth and Fourteenth Amendment Rights. And though 22 I would prefer to answer those questions, each 23 question, my attorneys have told me that if I 24 choose to do so, I risk losing their representation 25 and waiving those rights.</p>	<p>1 BY MR. HOROWITZ: 2 Q Jane Doe 7 told you she was in school at Royal 3 Palm Beach High School; isn't that true? 4 MR. PIKE: Form. 5 THE WITNESS: As most of your other questions 6 here today, Mr. Horowitz, I'd like to answer all of 7 those questions, each question, especially with 8 respect to Jane Doe 7. However, my attorneys have 9 counseled me that at least today, I must assert my 10 rights under the Sixth, Fifth and Fourteenth 11 Amendment. Because though I prefer to answer the 12 questions, they have told me that if I choose to do 13 so, I risk losing their representation and/or 14 waiving those rights. 15 BY MR. HOROWITZ: 16 Q Prior to May of 2005 were you ever nude in 17 front of Jane Doe 7? 18 MR. PIKE: Form. 19 THE WITNESS: I'd like to answer each one of 20 Jane Doe 7's claims, each one specifically. 21 However, today, my attorneys have counseled me that 22 I may not, and that I must assert my Fourteenth -- 23 my Fourteenth, Sixth and Fifth Amendment Rights as 24 provided by the Constitution. They've told me that 25 I choose to answer that question, which is my</p>
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<p>1 BY MR. HOROWITZ: 2 Q Mr. Epstein, Jane Doe 7 never told you she was 3 18 years old or older; isn't that true? 4 MR. PIKE: Form. 5 THE WITNESS: It would give me great pleasure 6 to be able to answer every one of Jane Doe 7's 7 claims here today. However, my attorneys have 8 advised me that I must assert my Fourteenth, Sixth 9 and Fifth Amendment Rights, because if I choose to 10 answer those questions, I risk losing their 11 representation and/or waiving those rights. 12 BY MR. HOROWITZ: 13 Q When Jane Doe 7 came to your home between 2003 14 and May of 2005, she appeared to you -- to you to be 15 younger than 18 years old; isn't that right? 16 MR. PIKE: Form. 17 THE WITNESS: I'd like to answer each and every 18 one of your questions here today, Mr. Horowitz. 19 However, my attorneys have counseled me that I may 20 not; I must assert my Fifth Amendment, Fourteenth 21 Amendment and Sixth Amendment Rights. And though 22 I'd rather -- and I prefer to answer each one of 23 Jane Doe 7's claims, my attorneys told me that if I 24 choose to do so here today, I risk losing their 25 representation and waiving those rights.</p>	<p>1 preference, I risk losing their representation 2 and/or waiving those rights. 3 BY MR. HOROWITZ: 4 Q Prior to May of 2005 did you instruct Jane Doe 5 7 to remove her clothing during your massage? 6 MR. PIKE: Form. 7 THE WITNESS: It would give me great pleasure 8 to answer every one of Jane Doe 7's claims, each 9 one, with specificity. However, today, my 10 attorneys have counseled me that I may not, and 11 they've instructed me that I must assert my Fifth 12 Amendment, Fourteenth Amendment and Sixth Amendment 13 Rights under the U.S. Constitution. Though I'd 14 like to answer the question, they told me that if I 15 do so, I risk losing their representation and 16 waiving those rights. 17 BY MR. HOROWITZ: 18 Q Prior to May of 2005 did you instruct Jane Doe 19 7 to pinch your nipples and rub your chest? 20 MR. PIKE: Form. 21 THE WITNESS: I'd like to answer each one of 22 Jane Doe 7's claims with specificity. However, 23 today my attorneys have counseled me that I may 24 not, and that I must assert my rights under the 25 Fourteenth, Sixth and Fifth Amendment. Though I'd</p>

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<p>1 prefer to answer the question, my attorneys have 2 counseled me that if I choose to do so, I risk 3 losing their representation and waiving those 4 rights. 5 BY MR. HOROWITZ: 6 Q Did you prior to May 2005 ask Jane Doe 7 7 questions about her sexual experience and preferences? 8 MR. PIKE: Form. 9 THE WITNESS: Mr. Horowitz, as you probably -- 10 probably know, I'd like -- I'd like to answer each 11 one of your questions today, especially Jane Doe 12 7's claims. However, my counsel has advised me 13 that I must assert my rights under the Fourteenth, 14 Fifth and Sixth Amendment. And though I would 15 prefer to answer that question, he has counseled me 16 that if I choose to do so, I risk losing his 17 representation and waiving those rights. 18 BY MR. HOROWITZ: 19 Q Mr. Epstein, prior to May of 2005 did you touch 20 Jane Doe 7's breasts? 21 MR. PIKE: Form. 22 THE WITNESS: Mr. Horowitz, I'd like to answer 23 each one of your questions posed here today, but I 24 am going to have to respond as I've done to most of 25 your questions here today, the same exact way,</p>	<p>1 Q Prior to May 2005 did you touch Jane Doe 7's 2 breasts, even after she made repeated attempts to stop 3 you? 4 MR. PIKE: I apologize, form. 5 THE WITNESS: It would give me great pleasure 6 to answer each and every one of Jane Doe 7's 7 claims, each and every one. However, today, my 8 counsel has advised that I may not. I must assert 9 my rights under the Fourteenth, Sixth and Fifth 10 Amendment. And though I prefer to answer, my 11 counsel has told me that if I choose to do so, I 12 risk losing his representation and/or waiving those 13 rights. 14 BY MR. HOROWITZ: 15 Q Mr. Epstein, prior to May 2005 did you rub Jane 16 Doe 7's vagina? 17 MR. PIKE: Form. 18 THE WITNESS: It would give me great pleasure 19 to answer the questions and claims of Jane Doe 7, 20 your questions. It would give me great pleasure to 21 answer the questions of your partner, Jeffrey 22 Herman, who filed Jane Doe 7's lawsuit before he 23 was suspended by the Florida Bar. It would give me 24 great pleasure to, in fact, answer the questions 25 posed by Mr. Edwards' partner, Scott Rothstein, who</p>
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<p>1 which is unfortunately my counsel has told me that 2 I may not answer any questions that may be relevant 3 to any one of the lawsuits filed by you or your 4 partner that -- or your partner who was suspended 5 from the -- by the Florida Bar, or Mr. Edwards' -- 6 Edwards' clients -- excuse me -- Mr. Edwards' 7 partner, Scott Rothstein, who sits in jail. They 8 said, "I'm sorry, you can't -- you have to assert 9 your rights under the Fourteenth, Sixth and Fifth 10 Amendment." And though I would choose to answer 11 the question, I've been advised I risk losing their 12 representation and/or waiving those rights. 13 BY MR. HOROWITZ: 14 Q Prior to May 2005 did you attempt to remove the 15 bra off -- remove a bra off of Jane Doe 7? 16 MR. PIKE: Form. 17 THE WITNESS: I would very much like to respond 18 to the claims made by Jane Doe 7 with specificity. 19 However, today, my counsel has advised me that I 20 must assert my rights under the Fourteenth, Sixth 21 and Fifth Amendment. And though I'd prefer to 22 answer those questions, I -- if I do so, I'm told 23 that I risk losing their representation and/or 24 waiving those rights. 25 BY MR. HOROWITZ:</p>	<p>1 sits in jail. 2 His other partner is on the way to jail for 3 fabricating cases of a sexual nature against 4 wealthy people. However, my attorneys have 5 counseled me here today, I have to assert my 6 Fourteenth, Sixth and Fifth Amendment Rights. And 7 though I'd very much like to answer those 8 questions, he's informed me that if I choose to do 9 so, I risk losing his representation and/or waiving 10 those rights. 11 BY MR. HOROWITZ: 12 Q Prior to May of 2005 did you rub Jane Doe 7's 13 buttocks? 14 MR. PIKE: Form. 15 THE WITNESS: Again? 16 BY MR. HOROWITZ: 17 Q Prior to May of 2005 did you rub Jane Doe 7's 18 buttocks? 19 MR. PIKE: Form. 20 THE WITNESS: It would give me great pleasure 21 to be able to answer each one of Jane Doe 7's 22 claims here today with specificity. However, my 23 counsel has advised me that I must assert my 24 Fourteenth, Sixth and Fifth Amendment Right, so I'm 25 -- I'm going to respectfully refuse to answer.</p>

13 (Pages 238 to 241)



<p style="text-align: right;">Page 242</p> <p>1 BY MR. HOROWITZ:</p> <p>2 Q Prior to May 2005 did you masturbate by</p> <p>3 stroking your penis in front of Jane Doe 7?</p> <p>4 MR. PIKE: Form.</p> <p>5 THE WITNESS: I'd like to answer each one of</p> <p>6 your sexually charged questions, Mr. Horowitz. I</p> <p>7 would -- I would -- it would give me pleasure to be</p> <p>8 able to respond directly to your other partner --</p> <p>9 at least in this question -- who's now been</p> <p>10 unfortunately suspended from practicing law in the</p> <p>11 State of Florida after he filed this claim, or the</p> <p>12 partner of Mr. Edwards who sits in jail for filing</p> <p>13 claims of a sexual nature against wealthy people in</p> <p>14 Florida in order to fleece unsuspecting South</p> <p>15 Floridians, his firm accused of filing and</p> <p>16 fabricating sexual cases, called by the U.S.</p> <p>17 Attorney a criminal enterprise. So, though I'd</p> <p>18 like to answer each one of your questions, my</p> <p>19 attorneys have said if I do so, I risk losing their</p> <p>20 representation and/or waiving those rights.</p> <p>21 BY MR. HOROWITZ:</p> <p>22 Q Prior to May of 2005 did you ejaculate after</p> <p>23 masturbating, stroking your penis in front of Jane Doe</p> <p>24 7?</p> <p>25 MR. PIKE: Form.</p>	<p style="text-align: right;">Page 244</p> <p>1 questions about Jane Doe 7, okay?</p> <p>2 A Thank you.</p> <p>3 Q Prior to May 2005 did you walk across the room</p> <p>4 naked and enter a shower in front of Jane Doe 7?</p> <p>5 MR. PIKE: Form.</p> <p>6 THE WITNESS: I would greatly like to -- I</p> <p>7 would actually like to answer each one of your</p> <p>8 questions today, Mr. Horowitz, especially all the</p> <p>9 claims made by Jane Doe 7. However, at least</p> <p>10 today, my counsel has advised me that I must assert</p> <p>11 my rights under the Fifth, Sixth and Fourteenth</p> <p>12 Amendment. Though I prefer to answer the question,</p> <p>13 he's informed me that if I choose to do so, I risk</p> <p>14 losing his representation and/or waiving those</p> <p>15 rights.</p> <p>16 BY MR. HOROWITZ:</p> <p>17 Q Mr. Epstein, did you have sex -- sexual contact</p> <p>18 with Jane Doe 7 at your Palm Beach home on multiple</p> <p>19 occasions between 2003 and 2005?</p> <p>20 MR. PIKE: Form.</p> <p>21 THE WITNESS: Mr. Horowitz, these claims of a</p> <p>22 sexual nature I'd very much like to answer,</p> <p>23 especially with respect to Jane Doe 7. I'd like to</p> <p>24 answer those questions, if your partner was here</p> <p>25 who filed the claim, but he's been suspended by the</p>
<p style="text-align: right;">Page 243</p> <p>1 THE WITNESS: Again, your questions of a</p> <p>2 sexually charged nature in -- in order to either</p> <p>3 embarrass me -- I would greatly like to answer</p> <p>4 those questions. I'd like to answer it to your</p> <p>5 partner who has been disbarred -- sorry, not</p> <p>6 disbarred -- you've told me he's been suspended and</p> <p>7 not disbarred -- I keep getting it confused --</p> <p>8 after he filed this Jane Doe 7's claims, or similar</p> <p>9 claims filed by Mr. Edwards and his partner, Scott</p> <p>10 Rothstein, but his partner, Scott Rothstein, sits</p> <p>11 in jail. So, though I'd like to answer each one of</p> <p>12 these claims, my counsel has told me that at least</p> <p>13 today, at least today, I must assert my rights</p> <p>14 under the Fourteenth, Sixth and Fifth Amendment.</p> <p>15 And if I choose to answer, I risk losing his</p> <p>16 representation and/or waiving those rights. I'm</p> <p>17 going to need five minutes.</p> <p>18 BY MR. HOROWITZ:</p> <p>19 Q Prior -- do you need five minutes now?</p> <p>20 THE WITNESS: Sure.</p> <p>21 THE VIDEOGRAPHER: Time off the record 4:05</p> <p>22 (Thereupon, a short break was taken.)</p> <p>23 THE VIDEOGRAPHER: Time on the record 4:14.</p> <p>24 BY MR. HOROWITZ:</p> <p>25 Q Mr. Epstein, I am going pick up with the</p>	<p style="text-align: right;">Page 245</p> <p>1 Florida Bar for improper behavior. I'd like to</p> <p>2 answer those questions to Mr. Edwards' partner, but</p> <p>3 he sits in jail for crafting cases -- and if I</p> <p>4 misspoke before, it's crafting cases where he told</p> <p>5 people that he had settled cases against me and</p> <p>6 others. Not filed cases, but crafted total</p> <p>7 fictitious cases of a sexual nature in order to</p> <p>8 convince and fleece people of thousands and</p> <p>9 millions of dollars in South Florida. So those I'd</p> <p>10 like -- though I'd like to answer these questions</p> <p>11 of a sexually charged nature, my counsel has</p> <p>12 advised me that today at least, I must assert my</p> <p>13 rights under the Sixth, Fifth and Fourteenth</p> <p>14 Amendment. And though I'd prefer to answer those</p> <p>15 questions, he has told me that if I choose to do so</p> <p>16 -- if I choose to so, I risk losing his</p> <p>17 representation and/or waiving those rights.</p> <p>18 BY MR. HOROWITZ:</p> <p>19 Q Did you pay \$200 to Jane Doe 7 after each</p> <p>20 occasion in which you had sexual contact with her --</p> <p>21 MR. PIKE: Form.</p> <p>22 BY MR. HOROWITZ:</p> <p>23 Q -- between 2003 and 2000 -- and May 2005?</p> <p>24 MR. PIKE: Form.</p> <p>25 THE WITNESS: I'd like to answer that question.</p>

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1 as I'd like to answer each and every question  
2 regarding Jane Doe 7 and her claims. However, my  
3 counsel has advised me that at least today, I may  
4 not answer any questions relevant to this lawsuit  
5 or any other lawsuits, so that I must assert my  
6 rights under the Sixth, Fifth and Fourteenth  
7 Amendment. Though I'd prefer to answer, he's told  
8 me that if I choose to do so, I risk losing his  
9 representation and potentially waiving those  
10 rights.

11 BY MR. HOROWITZ:

12 Q Did you ask Jane Doe 7 for permission to touch  
13 either her breasts or vagina or both?

14 A Again, Mr. Horowitz, as I've answered most of  
15 your questions here today, I'd very much like to answer  
16 the claims of Jane Doe 7 and your firm and your partner,  
17 Jeffrey Herman, who was suspended by the Florida Bar  
18 after he filed these claims on behalf of Jane Doe 7.  
19 However, my counsel at least today has advised me that I  
20 must assert my rights under the Fourteenth, Fifth and  
21 Sixth amendment. And though I prefer to answer those  
22 questions, he's told me that if I choose to do so, I  
23 risk losing his representation and/or waiving those  
24 rights.

25 MR. PIKE: Form to that question as well.

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1 BY MR. HOROWITZ:

2 Q When Jane Doe 7 was still a minor, she  
3 indicated to you that she did not want you to touch her  
4 body; isn't that true?

5 MR. PIKE: Form.

6 THE WITNESS: It would give me -- I would like  
7 to answer those questions and claims of Jane Doe  
8 7. However, today, my attorneys have counseled me  
9 that I must assert my rights under the Sixth, Fifth  
10 and Fourteenth Amendment. Though I would prefer to  
11 give the answers directly to the -- your partner  
12 who filed this claim on behalf of Jane Doe 7, but  
13 the Florida Bar has suspended his license for  
14 improper behavior after he filed this claim. I'd  
15 prefer to give it to Mr. Edwards' partner, but he  
16 sits in jail, and his other partner is on the way  
17 to jail from -- for basically fabricating malicious  
18 claims of a sexual nature against people in South  
19 Florida. So, though I'd like to answer that  
20 question, I'd prefer to answer that question, I'm  
21 told that if I do so, I risk losing my counsel's  
22 representation and/or waiving those rights.

23 BY MR. HOROWITZ:

24 Q Isn't it true, sir, you touched Jane Doe 7's  
25 breasts and genitals when she was still a child after

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1 she indicated she did not want you to touch her?

2 MR. PIKE: Form.

3 THE WITNESS: Mr. Horowitz, I'd like to answer  
4 each one of Jane Doe 7's claims. However, today,  
5 my counsel has advised me that I must assert my  
6 rights under the Fourteenth, Sixth and Fifth  
7 Amendment. Though I'd prefer to answer these  
8 questions directly to your partner that was  
9 suspended or disbarred or -- I keep getting it  
10 confused -- since he filed these claims of Jane Doe  
11 7, or Mr. Edwards' partner who sits in jail for  
12 fabricating malicious claims of a sexual nature --  
13 I'm -- I'm -- I'm sorry, if you find this very  
14 funny. I don't. However, my attorneys have  
15 counseled me, I -- I must not answer that question  
16 today, and if I choose to do so, I risk losing his  
17 representation and/or waiving those rights.

18 BY MR. HOROWITZ:

19 Q When Jane Doe 7 was under the age of 18, did  
20 you try to persuade her that it was okay for you to  
21 touch her breasts and vagina and to masturbate in front  
22 of her?

23 MR. PIKE: Form.

24 THE WITNESS: Are you serious? Is -- can I  
25 hear that question again?

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1 BY MR. HOROWITZ:

2 Q Do you deny that when she was still a child --

3 A Can I -- I need to hear the question again,  
4 sorry.

5 Q Oh, I thought you said your hearing was okay.

6 MR. PIKE: Let's just go forward with the  
7 question --

8 BY MR. HOROWITZ:

9 Q When Jane Doe 7 was still --

10 MR. PIKE: -- and stop harassing the witness.

11 BY MR. HOROWITZ:

12 Q When --

13 MR. HOROWITZ: Harassing?

14 MR. PIKE: Yes.

15 MR. HOROWITZ: Is that what I'm doing, or is --  
16 -- or is harassing pinching --

17 MR. PIKE: Let's move to strike.

18 MR. HOROWITZ: -- the -- the --

19 MR. PIKE: All right. Let's just go.

20 MR. HOROWITZ: All right. I just want to know  
21 what's -- which is harassing.

22 BY MR. HOROWITZ:

23 Q Okay. When Jane Doe 7 was still a child, did  
24 you try to persuade her that it was okay for you to  
25 touch her vagina, breasts, and to masturbate?

15 (Pages 246 to 249)

<p style="text-align: right;">Page 250</p> <p>1 MR. PIKE: Form.</p> <p>2 THE WITNESS: I would very much like to answer</p> <p>3 the claims of Jane Doe 7 and your firm, but your --</p> <p>4 unfortunately your partner has -- is not here</p> <p>5 because he's been suspended by the Florida Bar for</p> <p>6 improper behavior. I'd prefer to answer that</p> <p>7 question of a sexually charged nature to</p> <p>8 Mr. Edwards' partner, who unfortunately couldn't be</p> <p>9 here because he's in jail for potentially the rest</p> <p>10 of his life for fabricating cases of a sexual</p> <p>11 nature against people in South Florida, stealing</p> <p>12 investors' monies, fleecing people out of millions</p> <p>13 of dollars, creating sexually charged cases in</p> <p>14 order to sort of fleece people. However, my</p> <p>15 attorneys have told me that today I must assert my</p> <p>16 rights under the Sixth, Fifth and fourteenth</p> <p>17 Amendment. And if I choose to answer those</p> <p>18 questions, which is my preference, I risk losing</p> <p>19 his counsel and waiving those rights.</p> <p>20 BY MR. HOROWITZ:</p> <p>21 Q Did you pay H.R. to bring Jane Doe 7 to your</p> <p>22 home for sexual activity?</p> <p>23 MR. PIKE: Form.</p> <p>24 THE WITNESS: I would very much like to answer</p> <p>25 all questions regarding H.R. and Jane Doe 7's</p>	<p style="text-align: right;">Page 252</p> <p>1 BY MR. HOROWITZ:</p> <p>2 Q Did you instruct S.K. to call Jane Doe 7 --</p> <p>3 strike that.</p> <p>4 Did you instruct S.K. to tell Jane Doe 7 to</p> <p>5 mislead the police with regard to their investigation</p> <p>6 into your criminal activity?</p> <p>7 MR. PIKE: Form.</p> <p>8 THE WITNESS: I'd like to answer every one of</p> <p>9 your questions that you've posed here today</p> <p>10 regarding Jane Doe 7 and her claims. However, my</p> <p>11 attorneys have advised me at least today, I may not</p> <p>12 do so, and I must assert my privileges under the</p> <p>13 Sixth, Fifth and Fourteenth Amendment. Though I'd</p> <p>14 prefer to answer those questions, I'm told that if</p> <p>15 I choose to do so, I risk losing his representation</p> <p>16 and potentially waiving those rights.</p> <p>17 BY MR. HOROWITZ:</p> <p>18 Q Mr. Epstein, is the telephone number</p> <p>19 917-855-3363 a telephone number that S.K. used at your</p> <p>20 expense in 2005?</p> <p>21 MR. PIKE: Form.</p> <p>22 THE WITNESS: I don't recall.</p> <p>23 BY MR. HOROWITZ:</p> <p>24 Q What telephone numbers did you use, or did you</p> <p>25 pay to be used between 2001 and 2006?</p>
<p style="text-align: right;">Page 251</p> <p>1 claims regarding H.R. However, today, my counsel</p> <p>2 has advised me that I must assert my rights under</p> <p>3 the Fifth, Fourteenth and Sixth Amendment.</p> <p>4 BY MR. HOROWITZ:</p> <p>5 Q Did you instruct S.K. to write down Jane Doe</p> <p>6 7's name and telephone number so that you could call</p> <p>7 Jane Doe 7 to come to your home for more sexual</p> <p>8 activity?</p> <p>9 MR. PIKE: Form.</p> <p>10 THE WITNESS: Again, these charges of a sexual</p> <p>11 nature that you and your firm have lodged against</p> <p>12 me, it would give me great pleasure to specifically</p> <p>13 answer those questions with respect to Jane Doe 7's</p> <p>14 claims. I would like to answer it directly to your</p> <p>15 partner, Mr. Herman, who filed the claim, but he's</p> <p>16 been suspended or disbarred by the Florida Bar.</p> <p>17 I'd like to respond to these sexually charged</p> <p>18 questions to Mr. Edwards' partner, Scott Rothstein,</p> <p>19 but he's in jail for fabricating malicious cases of</p> <p>20 a sexual nature against wealthy people in South</p> <p>21 Florida. So, though I would like to answer these</p> <p>22 questions, I have been informed by my attorneys</p> <p>23 that I must assert my privileges. And if I choose</p> <p>24 to answer, which is my preference, I risk losing</p> <p>25 his representation and/or waiving my rights.</p>	<p style="text-align: right;">Page 253</p> <p>1 A I --</p> <p>2 MR. PIKE: Form.</p> <p>3 THE WITNESS: I don't recall.</p> <p>4 BY MR. HOROWITZ:</p> <p>5 Q Okay. Can you think of any telephone number</p> <p>6 that you either used from your home, or paid someone</p> <p>7 else to use between 2001 and 2006?</p> <p>8 A I'd like to answer that question, but on advice</p> <p>9 of counsel I am going to have to claim my privilege</p> <p>10 under the Sixth, Fourteenth and Fifth Amendment.</p> <p>11 Q Sir, you don't deny that you sexually abused</p> <p>12 Jane Doe 7 when she was still a child, do you?</p> <p>13 MR. PIKE: Form.</p> <p>14 THE WITNESS: I'm sure these questions of a</p> <p>15 sexually charged nature, Mr. Horowitz, are going to</p> <p>16 be obvious to the jury. I'd like to answer each</p> <p>17 one of the claims that you've made of sexual abuse.</p> <p>18 I'd like to answer it to your partner, Mr. Jeffrey</p> <p>19 Herman, but he can't be here because he's been</p> <p>20 suspended or disbarred by the Florida Bar for</p> <p>21 improper behavior after he filed these claims of</p> <p>22 sexual abuse. I'd like to make -- respond to the</p> <p>23 sexual abuse claims made by Mr. Edwards' partner,</p> <p>24 Scott Rothstein, but he's in jail for the rest of</p> <p>25 his life, and his other partner is on the way to</p>

16 (Pages 250 to 253)



<p style="text-align: right;">Page 254</p> <p>1 jail for fictitiously fabricating malicious claims 2 of a sexual nature. So, though I'd like to answer 3 those questions, my attorneys have counseled me 4 that I may not today. And he's told me that if I 5 do so, I risk losing his representation and/or 6 waiving those rights. 7 BY MR. HOROWITZ: 8 Q Isn't it true, sir, that you are asserting the 9 Fifth Amendment privilege with regard to my questions 10 about Jane Doe 7 because you did, in fact, sexually 11 abuse Jane Doe 7 when she was a child? 12 MR. PIKE: Form. 13 THE WITNESS: The polar trick of asking someone 14 why they're asserting their Fifth Amendment Right, 15 I'm -- I'm -- I'm surprised, Mr. Horowitz. The 16 Supreme Court has made it very clear that the Fifth 17 Amendment is a right of every American who -- 18 innocent American to use to protect themselves from 19 people making malicious false claims, similar to 20 the one that the U.S. Attorneys have put 21 Mr. Edwards' partner in jail for, for the rest -- 22 potentially the rest of his life for making 23 malicious claims against innocent people, making 24 fictitious claims. Your partner has been suspended 25 since filing this claim of a sexual nature. So,</p>	<p style="text-align: right;">Page 256</p> <p>1 losing his representation and waiving those rights. 2 BY MR. HOROWITZ: 3 Q Mr. Epstein, is there any reason why the jury 4 should not infer from your testimony today that, in 5 fact, you did sexually abuse Jane Doe 7? 6 MR. PIKE: Form. 7 THE WITNESS: Again, these questions of a 8 sexually charged nature regarding my right to take 9 the Fifth Amendment under the advise of counsel, I 10 find disturbing. Not -- not so much disturbing 11 than your partner who's been disbarred or suspended 12 by the Florida Bar since he filed the claim here by 13 these girls, or Mr. Edwards' partner who sits in 14 jail potentially for the rest of his life, with his 15 other partners on the way to jail for fictitious, 16 malicious claims of a sexual nature. I'd like to 17 answer your questions with great specificity, 18 Mr. Horowitz, but my counsel has advised me that at 19 least today, I may not. And if I do so, which is 20 my preference, I risk losing their representation 21 and/or waiving those rights. 22 BY MR. HOROWITZ: 23 Q Mr. Epstein, you're not suggesting that Jane 24 Doe 7 fabricated or embellished her allegations of abuse 25 in light of anything done by Jeffrey Herman or Scott</p>
<p style="text-align: right;">Page 255</p> <p>1 though I'd like to answer that question, my 2 attorneys have advised me I may not. 3 BY MR. HOROWITZ: 4 Q Are you asserting the Fifth Amendment because 5 you're an innocent man, or because you're a guilty man? 6 MR. PIKE: Form. 7 THE WITNESS: I'd like to answer that question 8 as well. The Fifth Amendment is the right of an 9 American to protect themselves from charges -- 10 false charges. It's a right that the Supreme Court 11 says protects the innocent, Mr. Horowitz, the 12 innocent. It's a Supreme Court case. It's the -- 13 you're the lawyer. 14 I would like to -- the jury to know that your 15 partner has been suspended for improper behavior 16 since he filed these sexual abuse claims. 17 Mr. Edwards' partner sits in jail for potentially 18 the rest of his life for fabricating malicious 19 claims of a sexual nature against wealthy people in 20 South Florida. I would like to answer your 21 questions more specifically, but my attorneys will 22 not allow me to. They told me I must assert my 23 rights under the Sixth, Fifth and Fourteenth 24 Amendment. Though I would very much like to answer 25 that question, I'm told that if I do so, I risk</p>	<p style="text-align: right;">Page 257</p> <p>1 Rothstein, are you? 2 MR. PIKE: Form. 3 THE WITNESS: I think the jury is going to 4 decide that Jeffrey Herman who's been disbarred or 5 suspended by the Florida Bar for improper behavior 6 after filing this claim, or Mr. Edwards' partner 7 who sits in jail potentially for the rest of his 8 life, Mr. Horowitz, for the rest of his life, for 9 fabricating cases specifically of a sexual nature 10 -- I think the jury will decide whether these are 11 fabricated or embellished. I'd like to answer with 12 great specificity today; however, my attorneys have 13 advised that at least today, I must respond by 14 taking -- asserting my Fifth Amendment, Fourteenth 15 and Sixth Amendment privilege. And though I would 16 very much like to respond to that question, he's 17 told me that if I do so, I risk losing his 18 representation and/or waiving those rights. 19 BY MR. HOROWITZ: 20 Q Well, what is it that you'd like the jury to 21 infer exactly from the fact that Jane Doe 7 had Jeffrey 22 Herman as an attorney? 23 MR. PIKE: Form. 24 THE WITNESS: Jeffrey Herman went -- was 25 suspended after he filed a claim on behalf of Jane</p>

17 (Pages 254 to 257)



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<p>1 Doe 7 and your other girls. Scott Rothstein went 2 to jail for filing fictitious, malicious claims of 3 a sexual nature in order to simply get money, steal 4 money, fleece people for money. I'd like to answer 5 every one of your questions today, Mr. Horowitz. 6 However, my attorneys have counseled me that today 7 at least I may not, and must assert my rights. And 8 if I choose to answer the question, which is my 9 preference, I potentially might lose his 10 representation and/or waive those rights. 11 BY MR. HOROWITZ: 12 Q Okay. Mr. Epstein, so we're on the same page, 13 my next series of questions will involve Jane Doe Number 14 8, okay? Have you got that name locked into your head? 15 A I'll do my best. 16 Q Okay. Isn't it true, sir, that a girl named 17 Jane Doe 8 came to your Palm Beach estate in 18 approximately 2001 or 2002? 19 MR. PIKE: Form. 20 A I would very much like to answer the claims of 21 a Jane Doe 8. However, my attorneys have counseled me 22 that I must assert my rights under the Fifth, Fourteenth 23 and Sixth Amendment. I'd like to answer these claims of 24 a Jane Doe 8, but they told me if I were to do so, I 25 would risk losing their representation and/or waiving</p>	<p>1 and Sixth Amendment. Though I'd very much like to 2 answer those questions, I'm told that if I choose 3 to do so, I risk losing his representation and/or 4 waiving those rights. 5 BY MR. HOROWITZ: 6 Q Was -- was C.M.A. your prostitute? 7 MR. PIKE: Form. 8 THE WITNESS: Again, I'm sure these -- these 9 questions you find very clever, Mr. Horowitz. So 10 it's -- it's questions of a sexually charged nature 11 brought by Mr. Edwards' firm, his partner sitting 12 in jail for bringing cases of a sexually charged 13 nature against wealthy people in South Florida, 14 sitting in jail for the rest of his life. Your 15 partner being suspended by the Florida Bar for 16 improper behavior after filing of cases on behalf 17 your Jane Doe 8. So though I'd like to answer each 18 one of your questions here today, my counsel has 19 advised me that I may not. And -- excuse me -- 20 BY MR. HOROWITZ: 21 Q Go ahead. 22 A -- and though I would much prefer to do so, 23 he's told me that if I do so, I risk losing his 24 representation and or waiving those rights. I've got to 25 take five minutes, sorry.</p>
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<p>1 those rights. 2 BY MR. HOROWITZ: 3 Q Did you receive a phone call from a girl named 4 C.M.A., wherein she told you she was bringing Jane Doe 8 5 to your home for the purpose of giving you a massage? 6 A I would very much like to answer any question 7 regarding C.M.A., I believe, an admitted prostitute. 8 Her claims of bringing a Jane Doe 8 -- a girl named Jane 9 Doe 8; is that right -- to my house. However, my 10 attorneys have counseled with respect to all questions 11 today, all questions, I must assert my rights under the 12 Fifth, Sixth and Fourteenth Amendment. Though I'd like 13 to answer these questions with specificity, my counsel 14 has told me that if I choose to do so, I risk losing his 15 representation -- excuse me -- or my -- and/or my -- 16 waiving my rights. 17 Q Did you instruct S.K. to place a telephone call 18 C.M.A. to arrange for C.M.A. to bring underage girls to 19 your home for sexual activity? 20 MR. PIKE: Form. 21 THE WITNESS: I would like to answer each and 22 every one of your questions regarding a C.M.A., who 23 I believe is an admitted prostitute, and a Jane Doe 24 8, but my attorneys have advised me at least today, 25 I must assert my rights under the Fifth, Fourteenth</p>	<p>1 THE VIDEOGRAPHER: Time off the record 4:35. 2 (Thereupon, a short break was taken.) 3 BY MR. HOROWITZ: 4 Q Mr. Epstein, we're still -- 5 THE VIDEOGRAPHER: Time on the record 4:42. 6 MR. HOROWITZ: Sorry. 7 BY MR. HOROWITZ: 8 Q Mr. Epstein, we're still going to talk about 9 Jane Doe 8 a little bit more, okay? Did you instruct 10 C.M.A. to bring underage girls to your home to engage in 11 sexual activity with you? 12 MR. PIKE: Form. 13 THE WITNESS: I'd like to answer each question 14 being posed here today about now C.M.A., I believe, 15 an admitted prostitute and drug addict, and her 16 claims of bringing a Jane Doe 8 -- I believe you 17 said her name was -- to my house. However, at the 18 -- in the -- at the insistence of my attorney, his 19 response -- he's required me to assert my Fifth 20 Amendment, Sixth Amendment and Fourteenth Amendment 21 Right. Though I'd like to answer each and every 22 question about your Jane Doe 8, I unfortunately 23 could not do so today. 24 BY MR. HOROWITZ: 25 Q Mr. Epstein, you're not suggesting that</p>

18 (Pages 258 to 261)

<p style="text-align: right;">Page 262</p> <p>1 C.M.A.'s status as either a prostitute or drug user 2 diminishes the credibility of Jane Doe 8's sexual abuse 3 claim against you, are you? 4 A I'll let the -- 5 MR. PIKE: Form. 6 THE WITNESS: -- jury decide that. 7 BY MR. HOROWITZ: 8 Q Okay. Well, I want to know what -- what -- 9 what you're trying to convey to the jury? 10 MR. PIKE: Form. 11 THE WITNESS: I'd like to answer that question, 12 Mr. Horowitz, like I'd like to answer every one of 13 your questions, but I think it's going to be 14 obvious about what C.M.A. and Jane Doe 8 are 15 attempting to do. However, though I'd like to 16 answer with more specificity, my attorneys have 17 advise me I may not today, and I must assert my 18 rights under the Fifth, Sixth and Fourteenth 19 Amendment. Though I'd like -- I'd like to answer 20 the question, my attorneys have counseled me today 21 that if I choose to do so, I risk losing their 22 representation and/or waiving those rights. 23 BY MR. HOROWITZ: 24 Q Did you instruct S.K. to communicate with 25 C.M.A. by telephone in order to arrange for Jane Doe 8</p>	<p style="text-align: right;">Page 264</p> <p>1 brought this claim on behalf of Jane Doe 8, I 2 believe. But since that claim was brought, he was 3 suspended by the Florida Bar. I prefer to bring it 4 whose -- Mr. Edwards' partner, who's sitting next 5 to you, but he's in jail for the rest of his life 6 for bringing fictitious claims of a sexual nature 7 against wealthy people in Florida in order to get 8 as much money as he could. He was accused -- and 9 Mr. Edwards' firm was accused by the U.S. Attorney 10 of being -- and perpetrating the largest fraud in 11 South Florida's history being a criminal 12 enterprise. And I'm -- so I'm sorry I can't answer 13 these questions with specificity today, 14 Mr. Horowitz. But on advice of counsel, he's told 15 me that if I choose to answer, I risk losing his 16 representation and/or waiving my rights. 17 BY MR. HOROWITZ: 18 Q Mr. Epstein, is it your sworn testimony that 19 Jane Doe 8 retained Jeffrey Herman, and that he was 20 suspended after he was retained? 21 MR. PIKE: Form. 22 THE WITNESS: I'm sorry, it's -- again? 23 BY MR. HOROWITZ: 24 Q My question is -- well, I'll break it up in two 25 questions. Is it your sworn testimony that Jane Doe 8</p>
<p style="text-align: right;">Page 263</p> <p>1 to give you a massage? 2 MR. PIKE: Form. 3 THE WITNESS: I would like to answer every 4 question about your Jane Doe 8 claim. I'd like to 5 answer every question about your C.M.A. connection, 6 whoever, to Jane Doe 8. However, my attorneys have 7 advised me that I may not answer those questions 8 today. I must assert my rights under the 9 Fourteenth Amendment, Sixth Amendment and Fifth 10 Amendment. Though I think the -- I'd like to 11 answer those questions, my attorney has told me 12 that if I choose to do so, I risk losing his 13 representation and/or waiving those rights. 14 BY MR. HOROWITZ: 15 Q Mr. Epstein, did you inform S.K. that the 16 massage that Jane Doe 8 was to give you would be sexual 17 in nature? 18 MR. PIKE: Form. 19 THE WITNESS: I'd like to answer every one of 20 your questions regarding the claims of your Jane 21 Doe 8. However, my attorneys have counseled that I 22 may not answer any questions that may be relevant 23 to any of your lawsuits. I would prefer to have 24 given it to your partner, Jeffrey Herman, testified 25 in front of your partner, Jeffrey Herman, who</p>	<p style="text-align: right;">Page 265</p> <p>1 hired Jeffrey Herman to be her attorney? 2 A I only know that -- my only knowledge is that 3 Jane Doe 8 is represented by the firm where Jeffrey 4 Herman was -- used to be a partner. 5 Q Okay. And you're not suggesting to anyone that 6 Jeffrey Herman was suspended after Jane Doe 8 decided to 7 file a lawsuit, are you? 8 MR. PIKE: Form. 9 THE WITNESS: I do not know when Jane Doe 8 10 decided to file a lawsuit. If you'd like to tell 11 me, I'd be able to answer that question. 12 BY MR. HOROWITZ: 13 Q Okay. 14 A Would you like to tell me? 15 Q Did S.K. tell you that she confirmed by 16 telephone that Jane Doe 8 would be coming to your home 17 at a specific time to give you a massage? 18 MR. PIKE: Form. 19 THE WITNESS: I'd like to respond to every 20 question regarding Jane Doe 8 and her claims; 21 however, my attorney has counseled me today that I 22 may not answer those questions today, Mr. Horowitz. 23 I must assert my rights under the Fifth, Fourteenth 24 and Sixth Amendment. I would like to -- I'd like 25 to, in fact, know whether Mr. Herman's firm --</p>

19 (Pages 262 to 265)

<p style="text-align: right;">Page 266</p> <p>1 Mr. Herman who's been disbarred, or your firm or  2 your partner, Mr. Herman, who was -- who was  3 suspended -- sorry, not disbarred -- you keep  4 correcting me. I'm not really sure of the  5 difference -- or Mr. Edwards' partner who's in jail  6 for crafting all these fictitious lawsuits, and  7 fleecing people out of thousands of millions of  8 dollars. I'd like to do that, however, my  9 attorneys have counseled me that I may not do that  10 today. And if I choose to answer those questions,  11 which I prefer to do, I risk losing their  12 representation and/or waiving those rights.  13 BY MR. HOROWITZ:  14 Q Was it your intent during the course of Jane  15 Doe 8's visit to your home, that you would persuade,  16 induce or entice her to engage in sexual activity with  17 you?  18 MR. PIKE: Form. I didn't know if you were  19 finished.  20 MR. HOROWITZ: I'm finished.  21 THE WITNESS: I'd like to answer every question  22 with respect to your Jane Doe 8 claim, every one.  23 However, today, my counsel has advised me that I  24 may not, and must assert my Sixth, Fifth and  25 Fourteenth Amendment Right. And though I'd prefer</p>	<p style="text-align: right;">Page 268</p> <p>1 years old or older, did she?  2 MR. PIKE: Form.  3 THE WITNESS: I'd like to answer each and every  4 question about your Jane Doe 8 claim. However,  5 today, my attorneys have counseled me that I may  6 not, and I must assert my rights under the Sixth,  7 Fourteenth and Fifth Amendment. Though I'd like to  8 answer every question about Jane Doe 8 -- your Jane  9 Doe 8 claim, my attorneys have counseled -- said to  10 me that if I choose to answer those questions, I  11 risk losing their representation and/or waiving  12 those rights.  13 BY MR. HOROWITZ:  14 Q When -- when you met Jane Doe 8, she appeared  15 to you to be younger than 18 years old; isn't that  16 right?  17 MR. PIKE: Form.  18 THE WITNESS: Again, I'd like to answer every  19 question I could possibly answer regarding your  20 Jane Doe 8 claim, and every -- and the claims  21 regarding your other people that you've brought up  22 today, but I must respond the same way I've  23 responded to most of your other questions here  24 today, Mr. Horowitz, which is on advice of my  25 counsel, I could not answer today, though I'd like</p>
<p style="text-align: right;">Page 267</p> <p>1 to answer the questions, he's told me that if I  2 choose to do so, I risk losing his representation  3 and/or waiving those rights.  4 BY MR. HOROWITZ:  5 Q During the course of Jane Doe 8's visit to your  6 home, did you succeed in persuading her, inducing her,  7 or enticing her to engage in sexual activity with you?  8 MR. PIKE: Form.  9 THE WITNESS: I would like to answer every  10 question about your Jane Doe 8 -- Jane Doe 8 or  11 Jane Doe 8 claim. However, my attorneys have  12 counseled me that I may not answer any questions  13 that may be relevant to any one of your lawsuits  14 brought by you or your partner, Jeffrey Herman, but  15 he's been suspended by the Florida Bar since he  16 filed money -- many of your claims of a similar  17 nature, or Mr. Edwards's partner who sits in jail  18 for the rest of his life for crafting malicious  19 fabricated sexual natured-type claims -- sexually  20 charged claims against wealthy people in Florida in  21 order to fleece investors out of millions of  22 dollars. So though I'd like to answer those  23 questions, Mr. Horowitz, today I cannot.  24 BY MR. HOROWITZ:  25 Q Okay. Jane Doe 8 never told you she was 18</p>	<p style="text-align: right;">Page 269</p> <p>1 to. They've instructed me that I must assert my  2 rights under the Fourteenth, Sixth and Fifth  3 Amendment. And if I choose to answer the  4 questions, which is my preference, they tell me  5 that I would risk losing their representation  6 and/or waiving my rights.  7 BY MR. HOROWITZ:  8 Q Were you nude in front of Jane Doe 8 when she  9 was still a child under the age of 18?  10 MR. PIKE: Form.  11 THE WITNESS: Mr. Horowitz, I'm going to have  12 to answer that question the way I've answered most  13 of your questions here today. It would give me  14 pleasure to answer the claims of Jane Doe 8.  15 However, my counsel has advised me that I may not  16 answer any questions relevant -- that may be  17 relevant to any of the lawsuits that you've  18 brought, or your partner that was subsequently  19 suspended from the practice of law in Florida has  20 brought. And though I'd like to answer those  21 questions specifically, my counsel has told me that  22 if I do so, I risk losing his representation and/or  23 waiving those rights.  24 BY MR. HOROWITZ:  25 Q Did you instruct Jane Doe 8 to remove her</p>

20 (Pages 266 to 269)



<p style="text-align: right;">Page 270</p> <p>1 clothing when she was still a child?</p> <p>2 MR. PIKE: Form.</p> <p>3 THE WITNESS: I'd like to answer each one of</p> <p>4 the questions you've posed about your Jane Doe 8</p> <p>5 claim; however, my attorneys have counseled me that</p> <p>6 I may not today -- excuse me -- I must assert my</p> <p>7 rights under the Fourteenth, Fifth and Sixth</p> <p>8 Amendment. Although I'd prefer to answer the</p> <p>9 question, my attorneys have counseled me that I may</p> <p>10 not.</p> <p>11 BY MR. HOROWITZ:</p> <p>12 Q When Jane Doe 8 was still a child, did you</p> <p>13 instruct her to pinch your nipples and rub your chest?</p> <p>14 MR. PIKE: Form.</p> <p>15 THE WITNESS: It would give me pleasure to be</p> <p>16 able to answer the questions regarding your Jane</p> <p>17 Doe 8 claims. However, my attorneys have counseled</p> <p>18 me that today I may not answer any question that</p> <p>19 may be relevant to any of the lawsuits brought by</p> <p>20 your firm, your firm, including your partner,</p> <p>21 Jeffrey Herman, who was subsequently suspended or</p> <p>22 disbarred by the Florida legal -- by the Florida</p> <p>23 Bar after bringing some of these claims, or</p> <p>24 Mr. Edwards' partner that sits in jail for the rest</p> <p>25 of his life for crafting and trying to convince</p>	<p style="text-align: right;">Page 272</p> <p>1 BY MR. HOROWITZ:</p> <p>2 Q During the course of her visit to your home,</p> <p>3 did you touch Jane Doe 8's breasts?</p> <p>4 MR. PIKE: Form.</p> <p>5 THE WITNESS: Unfortunately my attorneys have</p> <p>6 counseled me that today, though I'd like to answer</p> <p>7 every one of your questions specifically, I'd have</p> <p>8 to answer this question like I've answered most of</p> <p>9 the other questions with respect to Jane Doe 8 and</p> <p>10 the Jane Doe 8 claims, which is I'd have to assert</p> <p>11 my rights under the Sixth, Fourteenth and Fifth</p> <p>12 Amendment. Because if I don't do so, and I choose</p> <p>13 to answer, which is my preference, my counsel has</p> <p>14 advised me I am in risk of losing their</p> <p>15 representation and waiving those rights.</p> <p>16 BY MR. HOROWITZ:</p> <p>17 Q During the course of her visit to your home,</p> <p>18 did you rub Jane Doe 8's vagina?</p> <p>19 MR. PIKE: Form.</p> <p>20 THE WITNESS: Again?</p> <p>21 BY MR. HOROWITZ:</p> <p>22 Q During the course of Jane Doe 8's visit to your</p> <p>23 home, did you rub her vagina?</p> <p>24 MR. PIKE: Form.</p> <p>25 THE WITNESS: I'd like to answer every one of</p>
<p style="text-align: right;">Page 271</p> <p>1 other people that these claims were real, I</p> <p>2 believe, claims -- claims like this were real, and</p> <p>3 fleeced investors out of millions of dollars. His</p> <p>4 firm, Mr. Edwards' firm, of being accused by the</p> <p>5 U.S. Attorney of being a criminal enterprise,</p> <p>6 perpetrating one of the largest frauds in South</p> <p>7 Florida's history against south Floridians. So</p> <p>8 though I'd like to answer each one of your</p> <p>9 questions with great specificity, my counsel has</p> <p>10 told me today at least, I may not. And if I do so,</p> <p>11 I risk losing their representation and/or waiving</p> <p>12 those rights.</p> <p>13 BY MR. HOROWITZ:</p> <p>14 Q During the course of her visit, did you ask</p> <p>15 Jane Doe 8 questions about her sexual experience and</p> <p>16 preferences?</p> <p>17 MR. PIKE: Form.</p> <p>18 THE WITNESS: I would very much like to answer</p> <p>19 every question regarding the claims of your Jane</p> <p>20 Doe 8 -- your Jane Doe 8 claim. However, today, my</p> <p>21 attorneys have counseled me that I may not, and I</p> <p>22 must assert my rights under my Fourteenth, Sixth</p> <p>23 and Fifth Amendment. Though I'd like to answer</p> <p>24 each claim, today I am going to respectfully</p> <p>25 decline.</p>	<p style="text-align: right;">Page 273</p> <p>1 your Jane Doe 8 claims, especially your Jane Doe 8</p> <p>2 claims with respect to the details of what -- these</p> <p>3 questions. However, my attorneys have counseled me</p> <p>4 that today, I cannot answer those questions, at</p> <p>5 least today, and I must assert my rights under the</p> <p>6 Fourteenth, Fifth and Sixth Amendment. And though</p> <p>7 I'd prefer to answer those questions, especially</p> <p>8 the questions of a sexually charged nature, similar</p> <p>9 to the ones where Mr. Edwards, who's sitting next</p> <p>10 to you, whose partner is in jail for -- for</p> <p>11 crafting malicious claims of a sexual nature, or</p> <p>12 your partner who you smile about while you think</p> <p>13 he's been disbarred or suspended. It's okay. I'd</p> <p>14 like to answer those questions, but today, I</p> <p>15 cannot, because though I choose to do so my -- I --</p> <p>16 if I choose to do so, my counsel said I risk losing</p> <p>17 his representation and/or waiving those rights.</p> <p>18 BY MR. HOROWITZ:</p> <p>19 Q When Jane Doe 8 was at your home, did you</p> <p>20 masturbate in her presence?</p> <p>21 MR. PIKE: Form.</p> <p>22 THE WITNESS: I'd like to answer that Jane Doe</p> <p>23 8 question as much as -- it's Jane Doe 8, right --</p> <p>24 Jane Doe 8 question, as well as every other Jane</p> <p>25 Doe 8 claim that you've put on the table here</p>

21 (Pages 270 to 273)



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1 today, Mr. Horowitz. However, on the advice of my  
2 counsel, I am going to have to assert my rights  
3 under the Fourteenth Amendment, Sixth Amendment and  
4 Fifth Amendment. Though -- because I'd like to  
5 answer that question, I'm told by my counsel that  
6 if I choose to do so, I risk losing his  
7 representation and/or waiving those rights.

8 BY MR. HOROWITZ:

9 Q When Jane Doe 8 was still a child under the age  
10 of 18, isn't it true, sir, you masturbated to the point  
11 of ejaculation in front of her?

12 MR. PIKE: Form.

13 THE WITNESS: I'm sure these questions of a  
14 sexually charged nature, that hopefully the jury  
15 will be able to see through them, Mr. Horowitz.  
16 I'd like to answer all those questions. However,  
17 my counsel today has told me that I must respond by  
18 asserting my rights under the Sixth, Fifth and  
19 Fourteenth Amendment.

20 Sexually charged cases, similar to the ones  
21 where Mr. Roth -- excuse me -- which Scott  
22 Rothstein had fictitiously fabricated, who's -- he  
23 is Mr. Edwards' partner, who's in jail.  
24 Mr. Edwards' partners are on the way to jail for  
25 simply fabricating -- trying to steal money from

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1 investors in South Florida.

2 Your partner after he filed this -- or sometime  
3 during these claims has been suspended by the  
4 Florida Bar. So, though I'd like to answer these  
5 questions with great specificity, my attorneys have  
6 told me if I do so, I risk losing their  
7 representation and/or waiving those rights.

8 BY MR. HOROWITZ:

9 Q When Jane Doe 8 was still a child and she was  
10 in your home, did you tell her that you wanted her to  
11 touch your penis?

12 MR. PIKE: Form.

13 THE WITNESS: Again, I would like to answer  
14 every question about your Jane Doe 8 claims with  
15 great specificity, and I'm sure the ladies and  
16 gentlemen of the jury will understand that these  
17 sexually charged cases, similar to the ones where  
18 Mr. Edwards' partner has gone to jail for  
19 fabricating cases, trying to steal money from  
20 people in South Florida, your partner after filing  
21 some of these cases has been suspended, will see  
22 through it. And though I'd like to be able to  
23 answer with great specificity, my counsel has told  
24 me I may not and must assert my rights under the  
25 Sixth, Fifth and Fourteenth Amendment. So though I

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1 would prefer to answer those questions, today I may  
2 not because I've been told that if I do so, I risk  
3 losing his representation and/or waiving my rights.

4 BY MR. HOROWITZ:

5 Q Mr. Epstein, when Jane Doe 8 was at your home  
6 and was still a child, did you tell her that you wanted  
7 her to give you oral sex, otherwise known as a blow  
8 job?

9 MR. PIKE: Form.

10 THE WITNESS: Mr. Horowitz, I'd like to answer  
11 -- answer every question and claim made by your  
12 Jane Doe 8. However, my attorneys have counseled  
13 me that at least today, I have to assert my rights  
14 under the Fourteenth Amendment, the Sixth Amendment  
15 and the Fifth Amendment. I'm told that though I'd  
16 like to answer those questions, if I choose to do  
17 so, I risk losing his representation and/or waiving  
18 my rights.

19 I prefer to answer questions like this -- of a  
20 -- sexually charged nature to your partner, Jeffrey  
21 Herman, but he's been suspended by the Florida Bar  
22 for improper behavior after filing many of your  
23 claims.

24 I'd prefer to answer those questions to  
25 Mr. Edwards' partner, Scott Rothstein, but he's in

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1 jail for the rest of his life -- it appears the  
2 rest of his life. Many of Mr. Edwards' partners  
3 are on the way to jail for the rest of their life  
4 for crafting cases of a sexually charged nature,  
5 fictitious cases, in order to steal millions of  
6 dollars from local investors. So though I'd like  
7 to answer that question, I'm told that if I do so,  
8 I risk losing the representation of my counsel and  
9 waiving those rights.

10 BY MR. HOROWITZ:

11 Q Mr. Epstein, did you engage in sexual activity  
12 with Jane Doe 8 during the course of a massage at your  
13 Palm Beach home in 2001 or 2002?

14 MR. PIKE: Form.

15 THE WITNESS: When?

16 MR. HOROWITZ: Let me start over.

17 THE REPORTER: 2001, 2002 you said.

18 MR. HOROWITZ: I'll -- I'll -- I'll ask the  
19 question again, so that the record is a little bit  
20 clearer.

21 BY MR. HOROWITZ:

22 Q Did you engage in sexual activity with Jane Doe  
23 8 during the course of a massage at your Palm Beach home  
24 in 2001 and 2002?

25 MR. PIKE: Form.

22 (Pages 274 to 277)

<p style="text-align: right;">Page 278</p> <p>1 THE WITNESS: I'd like answer that question.  2 I'd like to answer all the questions with respect  3 to your Jane Doe 8 claims. However, my counsel has  4 advised me today that I must, at least today,  5 assert my rights under the Fifth, Sixth and  6 Fourteenth Amendment. So though I'd like to answer  7 those questions, I'm told that if I do so, I risk  8 losing his representation and/or waiving those  9 rights.  10 BY MR. HOROWITZ:  11 Q Did you --  12 THE VIDEOGRAPHER: Three minutes --  13 MR. HOROWITZ: I'm sorry?  14 THE VIDEOGRAPHER: I'm sorry, three minutes of  15 tape remaining.  16 MR. HOROWITZ: Okay.  17 BY MR. HOROWITZ:  18 Q Did you ask Jane Doe 8 for permission to touch  19 her in a sexual manner when she was still a child?  20 MR. PIKE: Form.  21 THE WITNESS: I'd like to answer every one of  22 your questions, but unfortunately I am going to  23 have to answer the same way I've answered most of  24 those here today, which is my counsel has advised  25 me that I must assert my rights under the</p>	<p style="text-align: right;">Page 280</p> <p>1 MR. PIKE: Form.  2 THE WITNESS: In 2001, 2002 -- I'd like to  3 answer every one of your questions regarding your  4 Jane Doe 8 claims. However, my attorneys have  5 counseled me today that I must assert my Sixth  6 Amendment, Fifth Amendment and Fourteenth Amendment  7 Right. Though I'd prefer to answer every one of  8 your questions regarding Jane Doe 8, today I'm  9 going to have to refuse to do so.  10 BY MR. HOROWITZ:  11 Q You touched Jane Doe 8's breasts, you touched  12 her genitals, and you did that after she indicated to  13 you that she did not want to be touched by you; isn't  14 that right?  15 MR. PIKE: Form.  16 THE WITNESS: I'd prefer -- excuse me -- if I  17 -- if I understood, in fact, when your partner,  18 Jeffrey Herman, filed most of his cases against me,  19 because I know he was disbarred or suspended after  20 he filed these cases of a sexual nature. I'm not  21 sure of the time frame, or when Mr. Edwards'  22 partner got involved who's now in jail for filing  23 -- for fabricating -- sorry -- for fabricating  24 malicious cases of a sexual nature against many  25 people in South Florida, called by the U.S.</p>
<p style="text-align: right;">Page 279</p> <p>1 Fourteenth Amendment, the Sixth Amendment and Fifth  2 Amendment. However, I'd like to answer those  3 questions, but he's told me that if I do so, I risk  4 losing his representation.  5 I'd like answering those questions to your  6 partner, Jeffrey Herman, but he's not here because  7 he's been suspended for improper behavior after he  8 filed these cases, after he had a press conference  9 in Palm Beach, in the streets of Palm Beach, called  10 the media.  11 I'd like to express the same answer to  12 Mr. Edwards' partner, but he's in jail for the rest  13 of his life for creating fictitious cases. So,  14 Mr. Horowitz, though I'd like to answer the  15 question today, I must deny -- I must refrain from  16 doing so at the advice of counsel.  17 MR. HOROWITZ: Let's change tapes.  18 THE VIDEOGRAPHER: Time off the record 5:01.  19 (Thereupon, a short break was taken.)  20 THE VIDEOGRAPHER: Time on the record 5:09.  21 This is Tape 6.  22 BY MR. HOROWITZ:  23 Q Mr. Epstein, in 2001 and 2002, Jane Doe 8  24 indicated to you that she did not want you to touch her  25 body; isn't that right?</p>	<p style="text-align: right;">Page 281</p> <p>1 Attorney -- his firm called by the U.S. Attorney, a  2 criminal enterprise. His partner is in jail for  3 the rest of his life. Many of his partners are on  4 the way to jail for the rest of their lives  5 potentially. So though I'd like to answer every  6 question with respect to your Jane Doe 8 sexual  7 claim -- your Jane Doe 8 claims of a sexual nature,  8 I've been advised by my counsel at least today that  9 I may not do so. And if I choose to do so, which  10 is my preference, I risk losing their  11 representation or waiving those rights.  12 BY MR. HOROWITZ:  13 Q Mr. Epstein, is it your testimony that Jane Doe  14 8 has in any way fabricated or embellished her  15 allegations that you sexually abused her during her  16 childhood?  17 MR. PIKE: Form.  18 THE WITNESS: I believe the jury will make that  19 decision, Mr. Horowitz. I believe that they will  20 understand that many of these claims put together  21 by your partner who was suspended for improper  22 practice in the State of Florida, who could no  23 longer practice law at least temporarily -- I  24 understand that Mr. Edwards' partner who's in jail  25 for potentially the rest of his life for</p>

23 (Pages 278 to 281)

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1 fabricating cases of a sexual nature. Many of  
2 Mr. Edwards' partners on their way to jail for the  
3 rest of their life for fabricating cases of a  
4 sexual nature. I'd like to answer each one of your  
5 questions regarding Jane Doe 8 and your other  
6 women, however, on advice of counsel today, I  
7 cannot. And I am told that if I choose to do so,  
8 and not assert my rights under the Sixth, Fifth and  
9 Fourteenth Amendment, I risk waiving those rights  
10 and losing his representation.

11 BY MR. HOROWITZ:

12 Q Mr. Epstein, did you pay C.M.A. to bring Jane  
13 Doe 8 to your home?

14 MR. PIKE: Form.

15 THE WITNESS: I believe -- again, I would like  
16 to answer all questions regarding C.M.A., I  
17 believe, an admitted prostitute, drug addict and  
18 her -- and anything to do with your Jane Doe 8  
19 claims. However, today, my counsel has advised me  
20 that I must, at least today, assert my rights under  
21 the Fifth, Sixth and Fourteenth Amendment. And  
22 though I would prefer to answer each one of your  
23 questions, Mr. Horowitz, he's told me that if I  
24 choose to do so, I risk losing his representation  
25 and/or waiving my rights.

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1 BY MR. HOROWITZ:

2 Q Mr. Epstein, did you instruct S.K. to call  
3 C.M.A. on the telephone to arrange for Jane Doe 8 to  
4 come back and give you another massage?

5 MR. PIKE: Form.

6 THE WITNESS: To give me -- excuse me?

7 BY MR. HOROWITZ:

8 Q One more time. Did you instruct S.K. to call  
9 C.M.A. on the telephone to make arrangements for Jane  
10 Doe 8 to come back to your home for more sexual  
11 activity?

12 MR. PIKE: Form.

13 THE WITNESS: I'd like to answer every question  
14 that you posed today regarding your Jane Doe 8  
15 claims, of her relationship with C.M.A. However,  
16 my attorneys have counseled me that at least today  
17 I must assert my Fourteenth Amendment, Sixth  
18 Amendment and Fifth Amendment Rights. Though I'd  
19 prefer to answer each one of the questions, my  
20 attorneys told me that if I choose to do so, I risk  
21 losing his representation and/or waiving those  
22 rights.

23 I believe the air conditioning has just gone  
24 off.

25 BY MR. HOROWITZ:

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1 Q Mr. Epstein, you don't deny that you sexually  
2 abused --

3 A Huh?

4 Q Mr. Epstein, you don't deny that you sexually  
5 abused Jane Doe 8, do you?

6 MR. PIKE: Form.

7 THE WITNESS: Mr. Horowitz, these sexually --  
8 this sexual abuse types of questions, which I'd be  
9 more than happy to answer, had it not been for my  
10 attorneys instructing me that I must assert my  
11 Fourteenth Amendment, Sixth Amendment and Fifth  
12 Amendment Rights, I -- I wish I could answer the  
13 question because Mr. Edwards' partner, Scott  
14 Rothstein, who's in jail for fabricating cases of a  
15 sexual nature against wealthy individuals in South  
16 Florida -- it's no secret. Most of the people --  
17 many of the people here, I'm sure, know that his  
18 partners are -- many of them are in jail, many are  
19 on the way to jail. Though -- though -- so though  
20 I would like to answer the questions regarding  
21 questions of a sexual nature, my attorneys at least  
22 for today, at least for today, have said I may  
23 not. And if I choose to do so, which they know is  
24 my preference, they have told me I risk losing  
25 their represent and/or waiving my rights.

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1 BY MR. HOROWITZ:

2 Q Isn't it true, sir, that you are asserting your  
3 Fifth Amendment privilege today with regard to questions  
4 about Jane Doe 8 because you did in fact sexually abuse  
5 Jane Doe 8 during her childhood?

6 MR. PIKE: Form.

7 THE WITNESS: I'm asserting my Fifth Amendment  
8 Sixth Amendment and Fourteenth Amendment Right as  
9 advised by my counsel, as a right of every American  
10 to protect themselves from malicious, false claims,  
11 similar to the ones that your colleague here,  
12 Mr. Edwards' partner is in jail for, fabricating by  
13 sexual -- cases of a sexual nature, called by the  
14 U.S. Attorney the largest fraud in South Florida's  
15 history, his firm of 70 partners considered a  
16 criminal enterprise for basically fabricating case  
17 -- cases of a sexual nature -- sexually charged  
18 nature. So though I would like nothing more than  
19 to answer the questions that you've posed here  
20 today regarding your cases, Mr. Horowitz, I've been  
21 told that if I choose to answer those questions, I  
22 risk losing my counsel's representation and waiving  
23 those rights.

24 BY MR. HOROWITZ:

25 Q Mr. Epstein, in -- in your mind, why shouldn't

24 (Pages 282 to 285)

<p style="text-align: right;">Page 286</p> <p>1 the jury infer from your testimony today that you did,  2 in fact, sexually abuse Jane Doe 8 when she was a child  3 given that you've been asserting a Fifth Amendment  4 privilege?  5 MR. PIKE: Form.  6 THE WITNESS: I -- I believe the jury will see  7 through your meager attempt that simply suggesting  8 that my asserting a Fifth Amendment privilege  9 that's used to protect innocent people from  10 malicious sexually charged cases similar to the  11 ones where Mr. Edwards' partner is in jail for the  12 rest of his life, with many of his other partners  13 on the way to spend the rest of their life in jail  14 for the cases of a -- for fabricating a malicious  15 case and stealing money from local Floridians. So  16 I'd like to answer each and every one of the  17 questions posed by you here today, Mr. Horowitz.  18 However, my attorneys have instructed me that I  19 must assert my Fifth Amendment, Sixth Amendment and  20 Fourteenth Amendment Right. So though I'd prefer  21 to answer the question, my counsel has told me that  22 if I do so, I risk losing his representation and  23 potentially waiving those rights.  24 BY MR. HOROWITZ:  25 Q Mr. Epstein, your counsel indicated to me that</p>	<p style="text-align: right;">Page 288</p> <p>1 an answer. He never gave an answer.  2 MR. HOROWITZ: Okay. Are you withdrawing the  3 objection?  4 MR. PIKE: I am going to let him respond to  5 your question.  6 MR. HOROWITZ: So are you withdrawing the  7 objection?  8 MR. PIKE: There's no reason to withdraw the  9 objection prior to. You're asking the question  10 again. I'm allowing him to answer.  11 MR. HOROWITZ: I'll ask the question -- just to  12 be -- have a clear record, I am going to ask the  13 question again.  14 MR. PIKE: Yes.  15 BY MR. HOROWITZ:  16 Q Mr. Epstein, identify all of your health care  17 providers for the past ten years, including, without  18 limitation, psychologists, psychiatrists, mental health  19 counselors, physicians, hospitals and treatment  20 facilities?  21 MR. PIKE: With respect to the order -- I  22 believe the order said psychiatrists and  23 psychologists. I don't think it went on -- I think  24 it actually limited, and if you recall, the  25 additional hospitals and providers. So having</p>
<p style="text-align: right;">Page 287</p> <p>1 you wanted to possibly change an answer that you had  2 given me earlier concerning your health care providers  3 that you've had in the past ten years. My question for  4 you is --  5 MR. PIKE: Well --  6 MR. HOROWITZ: Let me finish the question, then  7 you could --  8 MR. PIKE: Go ahead.  9 BY MR. HOROWITZ:  10 Q -- identify for us your health care providers  11 for -- in the past ten years, including without  12 limitation, psychologists, psychiatrists, mental health  13 counselors, physicians, medical doctors, hospitals and  14 treatment facilities?  15 MR. PIKE: Wait a second, let me be clear. I  16 did not tell you that Mr. Epstein wanted to change  17 his answer. Basically I objected and instructed  18 him not to answer a particular question because you  19 did not have the order or the interrogatory or the  20 request for production that you were referencing.  21 At a break you had showed me those particular  22 documents -- two of them. Not the order itself.  23 And as a result, I agreed to allow you to ask  24 Mr. Epstein the question so we didn't have to come  25 back as a courtesy. So I didn't tell him to change</p>	<p style="text-align: right;">Page 289</p> <p>1 stated that, Mr. Epstein can identify for you the  2 psychologist and/or psychiatrist that he has been  3 seen by within the last ten years, but he will not  4 elaborate on his answer if it would invade  5 attorney-client work product.  6 MR. HOROWITZ: Okay. So you answer -- as to a  7 portion of the question, you're instructing him not  8 to answer; is that right?  9 MR. PIKE: Consistent with the order.  10 MR. HOROWITZ: That's your version of the  11 order.  12 MR. PIKE: Do you have the order.  13 MR. HOROWITZ: You do. It was mailed to you.  14 MR. PIKE: Do you have the order here today?  15 MR. HOROWITZ: No.  16 MR. PIKE: Okay.  17 MR. HOROWITZ: I know what it says, though.  18 Can -- can we -- can we just get a question -- an  19 answer to the question?  20 MR. PIKE: Sure.  21 MR. HOROWITZ: Did you understand the question?  22 THE WITNESS: Dr. Steve Alexander and  23 Dr. Steven Strumwasser.  24 BY MR. HOROWITZ:  25 Q Okay. And Dr. Steven Alexander, what is his</p>

25 (Pages 286 to 289)



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<p>1 area of practice?</p> <p>2 A Psychology.</p> <p>3 Q And where does he practice?</p> <p>4 A In Palm Beach.</p> <p>5 Q And between what period of time -- during what</p> <p>6 period of time did you receive a -- either treatment or</p> <p>7 a consultation from him?</p> <p>8 MR. PIKE: I'm going to instruct him not to</p> <p>9 answer because that's attorney-client work product.</p> <p>10 MR. HOROWITZ: Okay. It's attorney-client as</p> <p>11 to --</p> <p>12 MR. PIKE: And work product.</p> <p>13 MR. HOROWITZ: Okay. All right.</p> <p>14 MR. PIKE: You didn't ask him who hired those</p> <p>15 individuals.</p> <p>16 MR. HOROWITZ: Okay. I don't need to know</p> <p>17 that.</p> <p>18 MR. PIKE: Sure, if -- you're raising your</p> <p>19 eyebrows as if you're concerned with regard to the</p> <p>20 objection. That shows -- --</p> <p>21 MR. HOROWITZ: I'm not going to deal with it</p> <p>22 today with you --</p> <p>23 THE REPORTER: One at a time.</p> <p>24 MR. PIKE: -- that shows some sort of</p> <p>25 bewilderment as to why I'm raising the objection.</p>	<p>1 Q Do you go to his office --</p> <p>2 A No.</p> <p>3 Q -- or does he come to you?</p> <p>4 A I've --</p> <p>5 MR. PIKE: I'm going to instruct him not to</p> <p>6 answer that question.</p> <p>7 BY MR. HOROWITZ:</p> <p>8 Q Does Doctor -- do you see Dr. Alexander at his</p> <p>9 office --</p> <p>10 MR. PIKE: I'm going to instruct him --</p> <p>11 BY MR. HOROWITZ:</p> <p>12 Q -- or does he come see you?</p> <p>13 MR. PIKE: I'm going to instruct him not to</p> <p>14 answer that question, also overbroad.</p> <p>15 BY MR. HOROWITZ:</p> <p>16 Q Okay. Between 2001 and 2006, using those two</p> <p>17 years as sort of a bookmark, did your sexual interests</p> <p>18 include looking at girls under the age of 18 while they</p> <p>19 were undressed?</p> <p>20 MR. PIKE: Form.</p> <p>21 MR. HOROWITZ: I'd like to answer each and</p> <p>22 every one of your questions here today,</p> <p>23 Mr. Horowitz. I'm going to answer that question</p> <p>24 like I've answered mostly all your other questions,</p> <p>25 which is on advice of counsel, they've asked me to</p>
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<p>1 So what I'm doing is, just allowing you the</p> <p>2 opportunity to ask the appropriate question so you</p> <p>3 understand the objection, that's all.</p> <p>4 BY MR. HOROWITZ:</p> <p>5 Q Okay. Were you under the care of Steven</p> <p>6 Alexander before any investigation into criminal</p> <p>7 activity began?</p> <p>8 MR. PIKE: I'm going to instruct him not to</p> <p>9 answer that question.</p> <p>10 BY MR. HOROWITZ:</p> <p>11 Q Were you under the other doctor -- am I saying</p> <p>12 this right, Strumwasser?</p> <p>13 A Yes, sir.</p> <p>14 Q What is his area of specialty?</p> <p>15 A Psychology.</p> <p>16 Q Does he have a subspecialty?</p> <p>17 A I don't know.</p> <p>18 Q Were you under his care or treatment before any</p> <p>19 investigation into a criminal activity occurred?</p> <p>20 MR. PIKE: Again, I'm going to instruct him not</p> <p>21 answer, work product.</p> <p>22 BY MR. HOROWITZ:</p> <p>23 Q Okay. And where is Dr. Strumwasser's office</p> <p>24 located?</p> <p>25 A Somewhere in Florida.</p>	<p>1 assert my Fourteenth Amendment Right, my Sixth</p> <p>2 Amendment Right, my Fifth Amendment Right. So</p> <p>3 though I'd like to answer each and every one of</p> <p>4 your questions, I'm going to have to assert those</p> <p>5 rights today.</p> <p>6 BY MR. HOROWITZ:</p> <p>7 Q Between 2001 and 2006 did your sexual interests</p> <p>8 include looking at the breasts and vaginal area of girls</p> <p>9 between the ages of 12 and 17?</p> <p>10 MR. PIKE: Form.</p> <p>11 THE WITNESS: I'm going to answer that question</p> <p>12 like I've answered any -- most of your other</p> <p>13 questions here today, which is on advice of</p> <p>14 counsel, I'm going to have to assert my rights</p> <p>15 under the Fourteenth Amendment, the Sixth Amendment</p> <p>16 and Fifth Amendment.</p> <p>17 BY MR. HOROWITZ:</p> <p>18 Q Between 2001 and 2006 did your sexual interests</p> <p>19 include digitally penetrating the vaginas of girls</p> <p>20 between the ages of 12 and 17?</p> <p>21 MR. PIKE: Form.</p> <p>22 THE WITNESS: I find these questions -- I'd</p> <p>23 like to answer every one of those questions.</p> <p>24 However, my counsel has told me I may not today. I</p> <p>25 wish I could answer those questions with respect --</p>

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<p style="text-align: right;">Page 294</p> <p>1 or directly to your partner that filed most of 2 these lawsuits, however, he's been suspended from 3 the Florida Bar. 4 I'd like to answer these questions to 5 Mr. Edwards' partner, but he's in jail for 6 fabricating cases of a sexually charged nature 7 against wealthy people and stealing millions of 8 dollars from local South Floridians. So though I 9 would prefer to answer these question, I've been 10 told by my counsel that if I choose to do so, I 11 risk losing his representation and waiving my 12 rights. 13 BY MR. HOROWITZ: 14 Q Between 2001 and 2006 did your sexual interests 15 include masturbating on a massage table in the presence 16 of girls under the age of 18? 17 MR. PIKE: Form. And -- and -- and let me -- 18 let me interject here for a second. I -- I noticed 19 that the tenor of the questions has changed since 20 we've been in deposition for over seven hours, and 21 I noticed that you have a list of questions toward 22 the back of your outline there (indicating) that 23 seems to be not really detailed or relevant to your 24 clients. Now -- 25 MR. HOROWITZ: I don't know what outline you're</p>	<p style="text-align: right;">Page 296</p> <p>1 MR. PIKE: Form. 2 THE WITNESS: I'd like to answer every one of 3 your questions here today regarding all your claims 4 of these girls, however, my attorneys have 5 counseled me today that I must assert my Fourteenth 6 Amendment, Sixth Amendment and Fifth Amendment 7 Right. So though I would like to answer the 8 question, I'm told that if I do so, I risk losing 9 his representation and/or waiving those rights. 10 BY MR. HOROWITZ: 11 Q Mr. Epstein, between 2001 and 2006 did your 12 interest include paying girls under the age of 18 for 13 massages of a sexual nature? 14 MR. PIKE: Form. 15 THE WITNESS: I would really like to answer 16 every one of your questions here today, 17 Mr. Horowitz. Unfortunately I am going to have to 18 answer that question like I've answered many of 19 your other questions, on advice of my counsel who's 20 suggested that I must assert my rights under the 21 Fourteenth, Fifth Amendment and Sixth Amendment. 22 Though I would greatly prefer to answer these 23 questions, my attorneys told me that if I choose to 24 do so, I risk losing his representation and waiving 25 my rights.</p>
<p style="text-align: right;">Page 295</p> <p>1 looking at. Are you looking at my outline? 2 MR. PIKE: -- I'm not finished -- 3 MR. HOROWITZ: Continue. 4 MR. PIKE: -- I just want to make a clean 5 record, okay? Mr. Edwards is very -- is very well 6 aware, and I'm very well aware, that no matter what 7 your understanding as of -- as of this case and 8 what you're trying to prove and what burden you're 9 trying to meet, cannot use this deposition as a 10 means to harass Mr. Epstein or any other client. 11 His sexual interests in general, as you're 12 asking them, is argumentative and it's harassing, 13 and I'm only going to let it go on for a little bit 14 longer, okay? 15 MR. HOROWITZ: Okay. 16 MR. PIKE: So if you would, try to rephrase 17 your question -- 18 MR. HOROWITZ: Okay. 19 MR. PIKE: -- because we've been here a long 20 time, and -- and -- and I know what you're trying 21 to do here. 22 BY MR. HOROWITZ: 23 Q Between 2001 and 2006, Mr. Epstein, would it 24 arouse you to have underage girls talk about their sex 25 life while they're undressed?</p>	<p style="text-align: right;">Page 297</p> <p>1 BY MR. HOROWITZ: 2 Q Between 2001 and 2006 did you have a room in 3 your home in Palm Beach County where you received 4 massages? 5 MR. PIKE: Form. 6 THE WITNESS: I am going to have to answer that 7 question the same way I've answered most of your 8 other questions here today, Mr. Horowitz, which is 9 on advice of my counsel I'm told that I must assert 10 my rights under the Sixth Amendment, Fourteenth 11 Amendment and Fifth Amendment. And though I'd 12 prefer to answer those questions, my attorneys told 13 me that if I choose to do so, I risk losing their 14 representation or waiving my rights. 15 BY MR. HOROWITZ: 16 Q Between 2001 and 2006, at your home in Palm 17 Beach, did you have sexual contact with over 30 girls 18 under the age of 18 in your massage room? 19 MR. PIKE: Form. 20 THE WITNESS: I would like to answer each one 21 of your claims today, Mr. Horowitz. However, my 22 attorneys have counseled me that I may not answer 23 any questions that may be relevant to any of your 24 lawsuits brought by you, your partner who's been 25 suspended from the practice of law in South</p>

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Florida, Mr. Edwards' partner, Scott Rothstein, who sits -- spending the rest of his life in jail for fabricating cases. I'd like to answer every one of your questions, but today, my attorney told me I cannot, at least today. And if I choose to do so, I risk losing his representation and/or waive my rights.

BY MR. HOROWITZ:

Q Isn't it true, sir, that between 2000 -- isn't it true, sir, that between 2001 and 2006, you had a very specific method for sexually abusing girls between the ages of 12 and 13 in your Palm Beach County home?

A You continue to use --

MR. PIKE: Form.

THE WITNESS: -- huh. Again, these questions, I believe the jury is going to see through, Mr. Horowitz. These are questions similar to the ones that people have suggested Mr. Edwards' partner, Scott Rothstein, who's spending the rest of his life in jail for fabricating cases of a sexually charged nature, has tried to convince investors in South Florida, that he stole millions of dollars based on sexually charged cases similar to these claims that you've made. I'd like to answer each one of your questions today. However,

fictitious cases part of the perpetration of the largest fraud in South Florida's history, calling Mr. Edwards' firm a criminal enterprise.

Your partner is not here today because he's been suspended after he filed these cases. So though I'd like to answer each and every one of your questions, my counsel has advised me that I may not today. And though I'd prefer to do so, he said if I choose to do so, I would risk losing his representation and/or waiving my rights.

BY MR. HOROWITZ:

Q Mr. Epstein, between 2001 and 2006 you paid people to recruit and solicit girls to come to your home who were between the ages of 13 and 17, whereupon you would engage in sexual activity with them; isn't that right?

MR. PIKE: Form.

MR. HOROWITZ: Again, I'm sure, Mr. Horowitz, the jury will be able to see through your questions of a sexually charged nature. I'd like to answer each one of your questions. However, my attorneys have counseled me that today at least, I may not. I must assert my rights under the Fourteenth, Sixth and Fifth Amendment. The questions of a sexually charged nature don't surprise me. They're similar

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my attorneys have counseled me that I may not answer any questions that may be relevant to any of your lawsuits.

BY MR. HOROWITZ:

Q Between 2000 --

A Excuse me.

Q Go ahead.

A And though I'd prefer to answer the question, my attorneys have counseled me that if I do so, I ask -- excuse me -- bless you -- I risk losing their representation and/or waiving my rights.

BY MR. HOROWITZ:

Q Between 2001 and 2006 you targeted a specific age of girls between 13 and 17 for sexual abuse in your home; isn't that right?

MR. PIKE: Form.

THE WITNESS: These type of questions, sexually charged questions, I believe the jury will be able to see through, Mr. Horowitz. They're similar to the claims and charges and that Mr. Roth -- Mr. Edwards' partner, Scott Rothstein, sits currently in jail for the rest of his life, fabricating cases of a sexual nature simply in order to steal millions of dollars from local Floridians. The U.S. Attorney called some of these

in nature to the sexually charged cases that Mr. Edwards' partner currently sits in jail for -- for the rest of his life.

A 70-man law firm filed bankruptcy, called by the U.S. Attorney a criminal enterprise, perpetrating one of the largest frauds in South Florida history by crafting cases of a sexually charged nature in order to fleece local Floridians of thousands and thousands of dollars. So though I'd like to answer each one of your questions, today at the advice of counsel, I cannot. And though I'd like to answer it, my counsel has told me that if I choose to do so, I risk losing his representation and/or waiving my rights.

BY MR. HOROWITZ:

Q Mr. Epstein, between 2001, 2006 you paid someone to schedule appointments by telephone for girls between the ages of 13 and 17 to come to your home for sexual activity with you; isn't that right?

MR. PIKE: Form.

THE WITNESS: These claims of a sexually charged nature I would very much like to answer today with great specificity. But as most of your questions have been answered today, I, on the advice of counsel, have had to invoke my Sixth

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<p>1 Amendment, Fourteenth Amendment and Fifth Amendment 2 Rights. Though I'd prefer to speak to your partner 3 who's not here because he's been suspended from the 4 practice of law in South Florida after he's filed 5 these cases, held a big press conference. 6 Mr. Edwards' partner who's in jail for the rest 7 of his life it appears for fabricating fictitious 8 cases of a sexually charged nature. So though I'd 9 like to answer every one of your questions with 10 great specificity, I've been told by my counsel if 11 I choose to do so, I risk losing his representation 12 and waiving those rights. Five minutes? 13 MR. HOROWITZ: If that's what you need. 14 THE WITNESS: Is that okay? Is that okay? 15 MR. EDWARDS: Break. 16 THE WITNESS: Five minutes? 17 MR. EDWARDS: Break as long as you want. 18 THE VIDEOGRAPHER: Okay. Time off the record 19 5:33. 20 (Thereupon, a short break was taken.) 21 THE VIDEOGRAPHER: Back on the record 5:41. 22 BY MR. HOROWITZ: 23 Q Mr. Epstein, with regard to the girls who were 24 at your Palm Beach County home between 2001 and 2006 25 with whom you had sexual activity, nearly all of these</p>	<p>1 be relevant to any of the lawsuits brought by you, 2 your partner of your firm who's been found after he 3 filed these claims to have committed improper acts 4 and has been suspended from the practice of law in 5 South Florida, or the cases brought by Mr. Edwards' 6 whose those firm has been described by the U.S. 7 Attorney as a criminal enterprise of a -- of 70 8 attorneys, where his senior partner is spending the 9 rest of his life in jail for fabricating cases of a 10 sexually charged nature against people in South 11 Florida, wealthy people, in order to fleece 12 unsuspecting investors out of their life savings. 13 So though I'd like to answer that question, 14 Mr. Horowitz, very much so like to answer that 15 question, I've been informed that if I chose to do 16 so, I risk losing the representation of my counsel 17 and waiving my rights. 18 BY MR. HOROWITZ: 19 Q Okay. And with regard to the underage girls 20 who you had sexual contact with at your home between 21 2001 and 2006, you had a common scheme of paying them 22 between 2 to \$300 each, each time they came; is that 23 right? 24 MR. PIKE: Form. 25 THE WITNESS: I would very much like to answer</p>
Page 303	Page 305
<p>1 girls were high school students in Palm Beach County; 2 isn't that right? 3 MR. PIKE: Form. 4 THE WITNESS: I'd like to answer all of your 5 questions here today, Mr. Horowitz, about all the 6 claims made by the girls you represent. However, 7 on advice of my counsel at least today, they've 8 instructed me to assert my Fourteenth Amendment 9 Right, my Sixth Amendment Right and my Fifth 10 Amendment Right. So though I would prefer to 11 answer the questions, if I choose to do so, I'm 12 informed that I risk losing my counsel's 13 representation and/or waiving my rights. 14 BY MR. HOROWITZ: 15 Q And with regard to the girls under the age of 16 18 who came to your home in 2001 through 2006, your 17 purpose in having them come to your home was for sexual 18 activity, but they were told they were coming to your 19 home to give a massage; isn't that right? 20 MR. PIKE: Form. 21 THE WITNESS: I'd like to answer each and every 22 one of your questions about the claims of your 23 girls. However, today, my counsel has informed me 24 that I must assert my rights under the Fourteenth, 25 Sixth and Fifth Amendment to any question that may</p>	<p>1 all the questions about the claims -- the so-called 2 claims of all your girls, of all your young women, 3 represented by your firm, represented initially by 4 your partner who was suspended by the Florida Bar 5 for improper behavior. He's not here because of 6 that -- excuse me -- the claims of Mr. Edwards' 7 clients, some admitted prostitutes. His partner is 8 in jail for the rest of his life for fabricating 9 cases of a sexually charged nature against people 10 in South Florida in it -- in order to fleece some 11 of the people out of their life savings. Yes, I'd 12 very much like to answer each and every one of your 13 questions, however, today, on advice of counsel, I 14 cannot. 15 BY MR. HOROWITZ: 16 Q With regard to the underage girls who came to 17 your home between 2001 and 2006 -- 18 A Would you let me finish? Would you mind if I 19 finish. I'm sorry. I choose -- I would -- I haven't 20 finished. 21 Q You have not finished. Would you like to 22 finish? 23 A Yes, if I could. 24 Q Go ahead. 25 A And though I'd like to respond to those</p>

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1 questions, my counsel has told me that if I do so, I  
2 risk losing his representation and potentially waiving  
3 my rights. Sorry. Go ahead.

4 Q With regard to the girls who came to your home  
5 between 2001 through 2006 who were under the age of 18,  
6 you knew that each of them was not a trained masseuse,  
7 correct?

8 MR. PIKE: Form.

9 THE WITNESS: I would like to answer each one  
10 of the claims brought by your various girls.  
11 However, today, my counsel has told me that I must  
12 not answer any questions that may be relevant to  
13 any of the lawsuits brought by your firm, or Mr.  
14 Edwards' firm whose partner sits in jail accused by  
15 the U.S. Attorney of South Florida of his firm  
16 being a criminal enterprise, his partner being in  
17 jail for the rest of his life accused by the United  
18 States Government of fabricating cases of a  
19 sexually charge nature in order to fleece local  
20 investors out of their life savings. So though I'd  
21 like to answer those questions, Mr. Horowitz --  
22 very much so, in fact, my attorneys have told me  
23 that if I choose to do so, I risk losing their  
24 representation and waiving my rights.

25 BY MR. HOROWITZ:

1 MR. PIKE: Form.

2 THE WITNESS: I'd like to answer that question,  
3 like I'd like to answer most of your other  
4 questions here today with respect to the claims of  
5 all these girls. However, my attorneys have told  
6 me I may not answer those questions today and must  
7 assert my rights under the Fourteenth, Fifth and  
8 Sixth Amendment.

9 So though your partner can't be here -- the  
10 partner that filed most of your cases -- because  
11 he's been suspended from practicing law by the  
12 Florida Bar, or Mr. Edwards' partner who sits to  
13 your right can't be here because he's in jail for  
14 fleecing people out of their entire life savings by  
15 crafting cases of a sexually charged nature. As  
16 you might imagine, I would like to answer each and  
17 every one of your questions, but at least today, I  
18 cannot, because if I choose to do so, I'm told by  
19 my counsel that I risk losing their representation  
20 and waiving my rights.

21 BY MR. HOROWITZ:

22 Q With regard to all of the underage girls who  
23 came to your home between 2001 and 2006, isn't it true  
24 that you touched all of them on either their breasts,  
25 vagina, buttocks, or some combination of those three

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1 Q Okay. With regard to all of the underage girls  
2 who came to your home between 2001 and 2006, you knew  
3 each them was under the age of 18; is that right?

4 MR. PIKE: Form.

5 THE WITNESS: I am going to have to respond to  
6 that question the way I've responded to most of  
7 your questions here today. I'd like to respond to  
8 every one of your questions with respect to all  
9 these claims made by your clients, claims filed by  
10 your partner who's not here because he's been  
11 suspended from practicing law in the State of  
12 Florida -- in fact, practicing law anywhere, or  
13 Mr. Edwards' partner who's in jail for the rest of  
14 his life for fleecing local investors out of their  
15 life savings by crafting cases of a sexually  
16 charged nature. I'd like to answer every one of  
17 your questions, but my counsel has advised me I may  
18 not today. And if I choose to do so, which is my  
19 preference, I risk losing his representation and/or  
20 waiving my right.

21 BY MR. HOROWITZ:

22 Q And with regard to all of the underage girls  
23 who came to your home between 2001 and 2006, you asked  
24 each of them to undress in your presence while giving  
25 you a massage; isn't that right?

1 parts?

2 MR. PIKE: Form.

3 THE WITNESS: I'd like to answer every one of  
4 those questions with great specificity, however,  
5 today, my attorneys have advised me that any  
6 question that may be relevant to any of the  
7 lawsuits filed by your firm, your firm whose  
8 partner has been suspended by the Florida Bar for  
9 improper behavior, cases filed by Mr. Edwards' firm  
10 whose partner sits in jail for the rest of his  
11 life, accused and pled guilty, I believe, to  
12 fleecing investors out of some of their life  
13 savings and like crafting cases of a sexually  
14 charged nature. I'd like to answer every one of  
15 your questions with great specificity. However,  
16 I'm told by my counsel if I choose to do so, I risk  
17 losing his representation and waiving my rights.

18 BY MR. HOROWITZ:

19 Q Between 2001 and 2006 did you keep sexual toys  
20 for your own use in your Palm Beach County home?

21 MR. PIKE: Form.

22 THE WITNESS: I'd like to answer that  
23 question. I'd like to answer the questions of all  
24 your claims regarding your girls that you're  
25 representing. Unfortunately your partner can't be

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<p style="text-align: right;">Page 310</p> <p>1 here because he's been suspended from practicing  2 law. So though I'd like to answer your questions,  3 I've been advised by my counsel that I cannot  4 today. I must assert my rights under the  5 Fourteenth, Sixth and Fifth Amendment. And though  6 I'd like to answer each one of these questions with  7 great specificity, I'm told that if I choose to do  8 so, I risk losing his representation and waiving my  9 rights.  10 BY MR. HOROWITZ:  11 Q Between 2001 and 2006, isn't it true that you  12 used sexual toys on underage girls in Palm Beach  13 County?  14 MR. PIKE: Form.  15 THE WITNESS: I would like to answer every one  16 of your questions regarding these claims by your  17 girls, but on advice of counsel today, I've been  18 told that I must assert my rights under the Fifth,  19 Sixth and Fourteenth Amendment. I'd prefer to, in  20 fact, assert those rights to your partner who has  21 been suspended by the Florida Bar since filing  22 these sexually charged cases, or Mr. Edwards'  23 partner who sits next to you, for his partner who's  24 now sitting -- spending the rest of his life in  25 jail accused of stealing the life savings of many</p>	<p style="text-align: right;">Page 312</p> <p>1 assert the Fifth --  2 MR. PIKE: Well, you want -- you want to be  3 here asking the same question -- let me -- let me  4 get this straight. Despite the fact that the Court  5 has -- because I'm working on time, all right? So  6 despite the fact that the Court has already made a  7 ruling on a number of issues covered by the Fifth  8 Amendment, you still want to ask those questions  9 again while you're here at deposition just to have  10 Mr. Epstein invoke the Fifth Amendment, correct?  11 MR. HOROWITZ: Well, you don't know what  12 questions I intend to ask. I have some very  13 specific questions about his net worth that have  14 not been addressed by any Court.  15 BY MR. HOROWITZ:  16 Q Okay. Is your net worth over one billion  17 dollars, sir?  18 THE WITNESS: On advice of counsel, I am going  19 to have to invoke the Fifth Amendment, Sixth  20 Amendment and Fourteenth Amendment.  21 BY MR. HOROWITZ:  22 Q Do you either own or have a beneficial interest  23 in the property located at 358 Brillo (phonetic) Way in  24 Palm Beach, Florida?  25 A I'm going to have to invoke my Fifth Amendment</p>
<p style="text-align: right;">Page 311</p> <p>1 Floridians by crafting sexually -- cases of a  2 sexually charged nature. So though I would like to  3 answer each and every one of your questions,  4 Mr. Horowitz, today, I'm told if I choose to do so,  5 I risk losing the representation of my counsel and  6 waiving my rights.  7 BY MR. HOROWITZ:  8 Q What is your net worth at the present time?  9 MR. PIKE: Form. I'm going to instruct him not  10 to answer that question. There's no -- the Court  11 has already ruled on that. Pursuant to the Court's  12 order, your order, and Mr. Edwards' order.  13 MR. HOROWITZ: Are you instructing him not to  14 answer?  15 MR. EDWARDS: My order?  16 MR. PIKE: Yeah.  17 MR. HOROWITZ: Are you instructing him not to  18 answer?  19 MR. PIKE: It's already -- it's already been  20 ruled on by the Court that Mr. Epstein does not  21 have to answer any net worth information. That  22 order just came out. What's the purpose in --  23 MR. HOROWITZ: I believe what the Court said is  24 that it sustained his Fifth Amendment privilege, so  25 he's got to assert the Fifth. He can -- he can</p>	<p style="text-align: right;">Page 313</p> <p>1 Sixth Amendment and Fourteenth Amendment Right.  2 Q Do you either own or have a beneficial interest  3 in the property located at 9 East 71st Street in New  4 York, New York?  5 A On advice of my counsel, I am going to have to  6 invoke my Fifth Amendment, Sixth Amendment and  7 Fourteenth Amendment Right.  8 Q Do you either own or have a beneficial interest  9 in the property located at 49 Zorro (phonetic) Ranch  10 Road in Stanley, New Mexico?  11 A On advice of my counsel, Mr. Horowitz, though  12 I'd like to answer these questions, my counsel has  13 advised me that I must invoke my Fifth Amendment, Sixth  14 Amendment and Fourteenth Amendment Right.  15 Q Do you either own or have a beneficial interest  16 in a property located at 301 East 66th Street in New  17 York, New York?  18 A Again, Mr. Horowitz, I'll have to answer that  19 question, as I've answered mostly all your other  20 questions here today, though I'd like to answer each one  21 with specificity, my counsel has advised me that I must  22 invoke my -- excuse me -- my Sixth Amendment Right, my  23 Fifth Amendment Right and Fourteenth Amendment Right, so  24 on the -- if I -- though I'd prefer to answer these  25 questions, I'm told that if I choose to do so, I risk</p>

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1 losing the representation of my counsel and waiving  
2 those rights.

3 MR. PIKE: Before -- before you start another  
4 question there, I just want to be clear for the  
5 record that you said on the record that these  
6 questions that you had prepared were going to be  
7 specifically detailed, and that they were not  
8 addressed by the Court, but, in fact, you've gone  
9 on with seven to eight questions, and all of which  
10 have been directly addressed by the Court.

11 Now, I'm here. I'm here. I'm here. I've  
12 unbuttoned my tie. I've -- my button -- I've  
13 pulled my tie out. I'm here for the nights for  
14 you, but are you really going to waste our time  
15 with questions that the Court has already ruled  
16 on?

17 MR. HOROWITZ: All right. I'm not here for the  
18 entire night with you, okay? I've got places to  
19 be. I've got a plane to catch. I'm going to try  
20 to get through as much as I can, but there's a  
21 point in time where I've got to go, okay?

22 MR. PIKE: Okay. I understand.

23 MR. HOROWITZ: I'm not going to get into a  
24 banter with you right now. We're going to continue  
25 with these questions. We're going to get done with

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1 MR. PIKE: Form to all these net worth  
2 questions. Are we in agreement there?

3 MR. HOROWITZ: No, I -- I think you waived it  
4 when you didn't answer -- assert those before.

5 MR. PIKE: That's fine.

6 THE WITNESS: I'd like to answer each one of  
7 those questions, but today, under advice of  
8 counsel, I'm going to have to assert my Fourteenth  
9 Amendment, Fifth Amendment and Sixth Amendment  
10 Right, Mr. Horowitz.

11 BY MR. HOROWITZ:

12 Q Do you either own or have a beneficial interest  
13 in -- in islands known as Little St. James in the U.S.  
14 Virgin Islands?

15 MR. PIKE: Form, and for the record I can't  
16 waive Fifth. Go ahead.

17 THE WITNESS: Excuse me, but I'd like to answer  
18 that question, but on advice of counsel, I'm going  
19 to assert my Fifth Amendment, Sixth Amendment and  
20 Fourteenth Amendment Right.

21 BY MR. HOROWITZ:

22 Q Do you either own or have a beneficial interest  
23 in the property located -- in a property located in the  
24 Westminster neighborhood in London, England?

25 MR. PIKE: Form.

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1 as much as we can.

2 MR. PIKE: That's fine. I just want to bring  
3 it up with the Court that you've gone on and you've  
4 asked a ton of questions here today that have  
5 already been covered by the Court's order that --  
6 that of which you and I have spent a lot of time on  
7 with regard to motion practice.

8 BY MR. HOROWITZ:

9 Q Okay. Do you either own or have a beneficial  
10 interest in the property located at 457 Madison Avenue,  
11 Fourth Floor?

12 A Though I'd like to answer each and every one of  
13 your questions with respect to these issues, on advice  
14 of counsel, I'm going to have to invoke my Fourteenth  
15 Amendment, Sixth Amendment and Fifth Amendment Right.

16 Q Do you either own or have a beneficial interest  
17 in the property located at 14 Wall Street?

18 A As I said before, I'm going to -- as I've  
19 answered most of these other questions, I'm going to  
20 have to invoke my Sixth Amendment, Fifth Amendment and  
21 Fourteenth Amendment Right, though I'd prefer to answer  
22 these questions.

23 Q Do you either own or have a beneficial interest  
24 in the property located at 8000 Walton Parkway in New  
25 Albany, Ohio?

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1 THE WITNESS: On advice of counsel, I'm going  
2 to invoke my Fifth Amendment, Sixth Amendment and  
3 Fourteenth Amendment Right.

4 BY MR. HOROWITZ:

5 Q Do you either own or have a beneficial interest  
6 in the property located -- at a -- strike that.

7 Do you either own or have a beneficial interest  
8 in any property located on Avenue Folk (phonetic) in  
9 Paris, France?

10 MR. PIKE: Form.

11 THE WITNESS: I'm going to answer that  
12 question, as I've answered all your other questions  
13 with respect to these issues, which is I am going  
14 to have to invoke my Fifth Amendment, Sixth  
15 Amendment and Fourteenth Amendment Right.

16 BY MR. HOROWITZ:

17 Q Sir, I am going to hand you a document -- we'll  
18 mark it as Exhibit 1 -- it's -- it's -- it's from the  
19 Florida Department of Law Enforcement Sexual Offender's  
20 and Predator's Flyer bearing your name, and on top it  
21 says, "Vehicle and Vessel Information." You can take a  
22 look at it for a moment with your -- you and counsel.  
23 My question is simply going to be: Is this an accurate  
24 list of the vehicles and vessels that you own as of  
25 today's date?

32 (Pages 314 to 317)



<p style="text-align: right;">Page 318</p> <p>1 A I am going to respond to that question,  2 Mr. Horowitz, as I've responded to every other question  3 today virtually, which is I am going to have to invoke  4 my Fifth Amendment, Sixth Amendment and Fourteenth  5 Amendment Right.  6 MR. HOROWITZ: Okay.  7 MR. PIKE: Form.  8 BY MR. HOROWITZ:  9 Q With respect to the vehicles and vessels listed  10 on Document 1 -- Exhibit 1, are there any vehicles on  11 that list that you do not own or have a beneficial  12 interest in at the present time?  13 MR. PIKE: Form.  14 THE WITNESS: I'm going to assert my Fifth  15 Amendment, Sixth Amendment and Fourteenth Amendment  16 Rights.  17 BY MR. HOROWITZ:  18 Q And with respect to the vehicles and vessels on  19 Exhibit 1, are there any other vehicles or vessels not  20 on that list which you -- which you own?  21 MR. PIKE: Form.  22 THE WITNESS: I'm going to answer that  23 question, as I've answered most of your other  24 questions here today, which is I am going to have  25 to invoke my Fifth Amendment, Sixth Amendment and</p>	<p style="text-align: right;">Page 320</p> <p>1 MR. PIKE: Form.  2 THE WITNESS: I would like to answer that  3 question, but I am going to have to answer the same  4 way I've answered most of your other questions  5 today, which is my counsel has informed me that any  6 questions relevant to these lawsuits, I must invoke  7 my Sixth Amendment, Fifth Amendment and Fourteenth  8 Amendment Right.  9 BY MR. HOROWITZ:  10 Q Since the first lawsuit was filed against you  11 alleging childhood sexual abuse, isn't it true that your  12 efforts to conceal your assets have included placing  13 money in the accounts of corporations in which you have  14 a beneficial interest?  15 MR. PIKE: Form.  16 THE WITNESS: Mr. Horowitz, I'm going to answer  17 that question, as I've answered most of your other  18 questions here today. My counsel has informed me  19 that I cannot answer any questions that may be  20 relevant to your lawsuits, so therefore, I must  21 invoke my Fourteenth Amendment Rights, my sixth  22 Amendment Rights and my Fifth Amendment Rights.  23 BY MR. HOROWITZ:  24 Q Since the filing of the first lawsuit against  25 you in which it was alleged that you committed sexual</p>
<p style="text-align: right;">Page 319</p> <p>1 Fourteenth Amendment Right.  2 BY MR. HOROWITZ:  3 Q And in the past two years isn't it true, sir,  4 that you have transferred vehicles and -- vehicles,  5 vessels or aircrafts out of your own name to other  6 parties in an effort to defraud potential creditors?  7 MR. PIKE: Form.  8 THE WITNESS: Unfortunately I'd like to answer  9 all of those questions, but on the advice of  10 counsel here today, I cannot answer any questions  11 that may be relevant to any of the lawsuits.  12 BY MR. HOROWITZ:  13 Q All right. Since the first civil lawsuit was  14 filed against you alleging childhood sexual abuse, have  15 you been taking steps to hide and conceal your assets?  16 MR. PIKE: Form.  17 THE WITNESS: I would like to answer that  18 question with specificity, however, my counsel has  19 advised me that I must invoke my Fourteenth  20 Amendment, Sixth Amendment and Fifth Amendment  21 Right.  22 BY MR. HOROWITZ:  23 Q Isn't it true, sir, that your efforts to  24 conceal your assets have included placing money in  25 accounts of other people?</p>	<p style="text-align: right;">Page 321</p> <p>1 abuse --  2 THE REPORTER: Committed -- I'm sorry?  3 MR. HOROWITZ: I'm sorry, I'll slow down a  4 little bit.  5 BY MR. HOROWITZ:  6 Q Since the filing of the first lawsuit against  7 you in which it was alleged that you committed childhood  8 sexual abuse, have you expended money to pay for the  9 lawyers of witnesses in -- in the lawsuit?  10 MR. PIKE: Form.  11 THE WITNESS: Mr. Horowitz, I'm going to answer  12 that question the way I've answered most of your  13 other questions here today, which is though I'd  14 like to answer those questions, I've been advised  15 by my counsel that I may not. And if I choose to  16 do so, and not invoke my Fourteenth, Sixth and  17 Fifth Amendment Rights which I am hereby doing,  18 that if I answer those questions I lose --  19 potentially lose his representation and/or waive my  20 rights.  21 BY MR. HOROWITZ:  22 Q Did you have surveillance cameras in either the  23 interior or exterior of your home on -- at Brillo Way  24 between 2001 and 2006?  25 MR. PIKE: Form.</p>

33 (Pages 318 to 321)



Page 322	Page 324
<p>1 THE WITNESS: Mr. Horowitz, I'm going to answer 2 that question the same way I've answered most of 3 your other questions here today. I'd like to 4 answer each one of your questions regarding your 5 claims with great specificity, however, my counsel 6 has advised me that I may not today, and thereby 7 have to invoke my Fourteenth Amendment Rights, my 8 Sixth Amendment Rights and Fifth Amendment Rights 9 as provided by the U.S. Constitution. So though 10 I'd like to answer those questions, I've been 11 informed that if I do so, I risk losing his 12 representation and/or waive my rights. 13 BY MR. HOROWITZ: 14 Q Sir, have you had sexual contact with girls 15 under the age of 18 in New York State in the past ten 16 years? 17 MR. PIKE: Form. 18 THE WITNESS: I'm sorry? 19 BY MR. HOROWITZ: 20 Q Have you, Jeffrey Epstein, had sexual contact 21 with girls under the age of 18 in New York State within 22 the past ten years? 23 MR. PIKE: Form. 24 THE WITNESS: Mr. Horowitz, I'd like to answer 25 every one of your questions here today about the</p>	<p>1 questions of a sexual nature, I would refer to, in 2 fact, direct it to your partner who's been 3 suspended after he filed some of these cases from 4 practicing law -- he got suspended from filing -- 5 practicing law in Florida. 6 Mr. Edwards' partner who's in jail for crafting 7 cases of a sexual nature, defrauding investors, 8 local people, out of their life savings by 9 fabricating malicious sexually charged cases. So 10 though I would like to answer each and every one of 11 your questions, today I cannot do so. And I'm told 12 that if I choose to do so, I risk losing the 13 representation of my counsel. 14 BY MR. HOROWITZ: 15 Q Was it your practice between 2001 and 2006 to 16 use your power to influence minor girls into having 17 sexual contact with you? 18 MR. PIKE: Form. 19 THE WITNESS: I would like to answer each and 20 every one of your questions. However, my counsel 21 has told me I may not. And though I would prefer 22 to answer, he's told me that if I choose to, I -- 23 if -- potentially will lose his representation or 24 waive my rights, therefore, I must invoke the 25 rights as protected -- under the Constitution of</p>
Page 323	Page 325
<p>1 claims made by all your girls. However, on advice 2 of my counsel, I've been told that I must invoke my 3 Fourteenth Amendment, Sixth Amendment and Fifth 4 Amendment Rights. Though I would like to answer 5 those questions, I've been told if I choose to do 6 so, I risk losing my counsel's representation 7 and/or waive those rights. 8 BY MR. HOROWITZ: 9 Q Have you had sexual contact with girls under 10 the age of 18 in the State of New Mexico in the past ten 11 years? 12 MR. PIKE: Form. 13 THE WITNESS: Mr. Horowitz, I'm going to answer 14 that question the same way I've answered virtually 15 all of your questions here today. On advice of my 16 counsel -- though I would like to answer those 17 questions -- he's informed me that I must invoke my 18 Sixth Amendment, Fifth Amendment and Fourteenth 19 Amendment Right under the U.S. Constitution. 20 BY MR. HOROWITZ: 21 Q Sir, between 2001 and 2006 was it your practice 22 to use your wealth to influence minor girls to have 23 sexual contact with you? 24 MR. PIKE: Form. 25 THE WITNESS: Mr. Horowitz, these types of</p>	<p>1 the Fourteenth Amendment, Sixth Amendment and Fifth 2 Amendment. 3 BY MR. HOROWITZ: 4 Q Isn't it true, sir, that the real reason that 5 you brought underage girls to your home in Palm Beach 6 County between 2001 to 2006, was that you could get 7 sexual satisfaction? 8 MR. PIKE: Form. 9 THE WITNESS: Mr. Horowitz, I would like to 10 answer each and every one of your questions that 11 you've raised here today. Unfortunately my counsel 12 has advised me that I cannot, and they have 13 instructed me to assert my rights as the -- as 14 under the Fourteenth Amendment, Sixth Amendment and 15 Fifth Amendment of the U.S. constitution. I would 16 prefer to answer those questions. I'd really 17 prefer to answer those questions, but my attorney 18 has told me I may not. But if I choose to do so, I 19 will risk losing his representation and/or waiving 20 those rights. Five minutes? 21 MR. HOROWITZ: Sure. 22 THE VIDEOGRAPHER: Time off the record 6:05 23 (Thereupon, a short break was taken.) 24 MR. HOROWITZ: All right. Let me just -- 25 THE VIDEOGRAPHER: Time on the record 6:11.</p>

34 (Pages 322 to 325)

Page 326	Page 328
<p>1 MR. HOROWITZ: All right. Let me just get this 2 on the record. It's now 6:11 p.m. We've been 3 working all day, as best we can, plowing through so 4 far the claims of my seven clients, and though I 5 have done my very best on my part to get through as 6 much material as I can, I simply cannot finish 7 today, number one, because we've already been 8 working an eight-hour day, and two, maybe more 9 importantly, I have a plane to catch in about a 10 little bit over an hour. So with that said, I 11 cannot complete today. You know, you can file what 12 you need to, and I'll file what I need to, but -- 13 MR. EDWARDS: Well -- 14 MR. HOROWITZ: Do you want to say anything? 15 MR. EDWARDS: Yeah. For the purposes of the 16 record, I'd just like to make the record in that 17 the deposition was set in nine cases today, I 18 believe. I was unable to ask any questions today, 19 and I think the record is going to be clear as to 20 the reason why that happened, both the video and 21 the transcript, in a case like this where the 22 options are answer questions, or take the Fifth, 23 and the election for the most part was take the 24 Fifth, it should be a short abbreviated 25 deposition. Instead the types of answers that we</p>	<p>1 to put that on the record, so that it's clear why 2 we're not finishing, at least from my vantage 3 point. 4 MS. EZELL: And I'd to add that I had cross- 5 noticed on behalf of our client in the one filed 6 case we have. We also represent three other 7 clients, and we do not yet have filed cases. We 8 certainly want a chance to ask our questions as 9 well. I do think we wasted a great deal of time 10 today in very self-serving answers that did nothing 11 to advance the discovery in this matter. 12 MR. PIKE: Is everybody done? 13 MR. HOROWITZ: Yes. 14 MR. EDWARDS: I'll just join in on the comments 15 by defense counsel. 16 MR. PIKE: Okay. I'm just going to move to 17 strike for purposes of the trial. I understand 18 that everybody is trying to make a record for any 19 future motion, but I move to strike everybody's 20 comments for purpose -- purposes of the trial in 21 this matter. 22 We're here right now, Mr. Edwards, for you to 23 begin and finish your deposition. We're here right 24 now for you, Mrs. Ezell, to begin and finish your 25 deposition of Mr. Epstein. And Mr. Horowitz, this</p>
Page 327	Page 329
<p>1 received were obstructionist in nature. I think 2 that that's -- that's going to be something that 3 the Court is going to rule upon, but that's going 4 to be our position. And that after every -- nearly 5 every question, there was some injection into the 6 record by Mr. Epstein about Jeffrey Herman and some 7 discipline that he had with the Florida Bar, as 8 well as Scott Rothstein and his being in jail, as 9 well as something to do with other partners going 10 to jail, despite the fact that I haven't asked a 11 single question, nor have any questions been asked 12 about my clients. 13 In addition to the mockery that was made of 14 this deposition by Mr. Epstein and of the overall 15 discovery process today because of the way he chose 16 to answer questions and that his counsel did not 17 instruct him to do otherwise, and instead seemed to 18 encourage those types of responses, we're unable to 19 finish today. It's going to take another day. 20 And one other thing that I think is going to be 21 clear, but I want to put on the record, is that we 22 probably took fifteen -- no exaggeration -- breaks, 23 each one of them initiated by Mr. Epstein, which 24 just also served only to obstruct the deposition 25 and cause us not to finish today. So I just want</p>	<p>1 case has been -- this deposition has been set for 2 some time, and, you know, whether or not you have a 3 flight plan, or whether or not it was prearranged, 4 I do not know. But we are here right now to finish 5 your deposition for your clients. So I see that 6 everybody is standing, with the exception of 7 Ms. Ezell. I'm sitting, and I'm ready to finish 8 this deposition and let you guys commence. 9 MS. EZELL: We've been going for eight hours 10 and fifteen minutes. The facility we're in is all 11 closed down. The lights are off everywhere. We 12 can't get in and out of doors. I think to suggest 13 we proceed for what would be another eight hours at 14 this point is just not workable. 15 MR. EDWARDS: And I probably have five hours of 16 questions, and that's assuming that the answers 17 that we receive were less elongated than the ones 18 we received already. So given the circumstances 19 and the nature of the responses and how long it 20 takes to respond, we would not finish until next 21 Thursday at this pace so I just don't think it 22 would be fruitful to continue. 23 MR. PIKE: I understand your statement. 24 MR. EDWARDS: Right. 25 MR. PIKE: The facility here we have arranged</p>

35 (Pages 326 to 329)

<p style="text-align: right;">Page 330</p> <p>1 to have it after hours. Our particular area is --</p> <p>2 is -- area is not closed down, so if you'd like to</p> <p>3 go forth with the deposition, we are here, as I've</p> <p>4 said.</p> <p>5 MR. HOROWITZ: Let me say this. You know, my</p> <p>6 -- nearly all of my clients have had two days of</p> <p>7 depositions, despite the fact that they're parties</p> <p>8 to only one case. Mr. Epstein is a party to a</p> <p>9 dozen cases just for -- on the lawyers who are here</p> <p>10 today. So given the practice of parties' appearing</p> <p>11 for two days of depositions in the past, it makes</p> <p>12 sense particularly in the case of Mr. Epstein who's</p> <p>13 a party in multiple cases to do at least two days</p> <p>14 of depositions for the same reasons. There's just</p> <p>15 a lot of material to cover.</p> <p>16 MR. PIKE: I think everybody has said their</p> <p>17 piece.</p> <p>18 MR. EDWARDS: Yep.</p> <p>19 MR. PIKE: Are we going off the record?</p> <p>20 MR. HOROWITZ: Yes, we can go off the record.</p> <p>21 THE VIDEOGRAPHER: Time off the record 6:17.</p> <p>22 (Videotaped deposition was concluded.)</p> <p>23 (Thereupon, Exhibit No. 1 was marked for</p> <p>24 identification.)</p> <p>25 THE REPORTER: Do you want to order this,</p>	<p style="text-align: right;">Page 332</p> <p>1</p> <p>2</p> <p>3 STATE OF FLORIDA )</p> <p>4 COUNTY OF BROWARD )</p> <p>5</p> <p>6</p> <p>7 I, the undersigned authority, certify that</p> <p>8 Jeffrey Edward Epstein personally appeared before me and</p> <p>9 was duly sworn.</p> <p>10</p> <p>11 WITNESS my hand and official seal this 22nd day</p> <p>12 of March, 2010.</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17 Vicki L. Lima, Court Reporter</p> <p>18 Notary Public - State of Florida</p> <p>19 Commission No: DD 882608</p> <p>20 Expiration Date: May 26, 2013</p> <p>21 Job #92076-B</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 331</p> <p>1 Mr. Horowitz?</p> <p>2 MR. HOROWITZ: Yes.</p> <p>3 MS. EZELL: We'll take a copy.</p> <p>4 MR. PIKE: We'll take a copy.</p> <p>5 MR. EDWARDS: Copy, please.</p> <p>6 (Proceedings were concluded.)</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 333</p> <p>1 CERTIFICATE</p> <p>2</p> <p>3 STATE OF FLORIDA )</p> <p>4 COUNTY OF BROWARD )</p> <p>5 I, Vicki L. Lima, Court Reporter, Notary Public</p> <p>6 in and for the State of Florida at Large, do hereby</p> <p>7 certify that the aforementioned witness was by me first</p> <p>8 duly sworn to testify to the whole truth; that I was</p> <p>9 authorized to and did report said deposition in</p> <p>10 stenotype; and that the foregoing pages are a true and</p> <p>11 correct transcription of my shorthand notes of said</p> <p>12 deposition.</p> <p>13</p> <p>14 I further certify that the said deposition was</p> <p>15 taken at the time and place hereinabove set forth and</p> <p>16 that the taking of said deposition was commenced and</p> <p>17 completed as hereinabove set out.</p> <p>18</p> <p>19 I further certify that I am not an attorney or</p> <p>20 counsel of any of the parties, nor am I a relative or</p> <p>21 employee of any attorney or counsel of any party</p> <p>22 connected with this action, nor am I interested in the</p> <p>23 action.</p> <p>24</p> <p>25 The foregoing certification of this transcript</p> <p>does not apply to any reproduction of the same by any</p> <p>means unless under the direct control and/or direction</p> <p>of the certifying reporter.</p> <p>IN WITNESS WHEREOF, I have hereunto set my hand</p> <p>this 22nd day of March, 2010.</p> <p>Vicki L. Lima, Court Reporter</p> <p>Notary Public - State of Florida</p> <p>Commission No: DD 882608</p> <p>Expiration Date: May 26, 2013</p> <p>Job #92076-B</p>

36 (Pages 330 to 333)

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UNIVERSAL LEGAL REPORTING  
888 EAST LAS OLAS BOULEVARD, SUITE 508  
FORT LAUDERDALE, FLORIDA 33301  
(954) 712-2600

March 22, 2010 Job #92076-B Volume II

Jeffrey Edward Epstein, witness  
Michael J. Pike, Esquire  
303 Banyan Boulevard, Suite 400  
West Palm Beach, Florida 33401  
RE: Jane Doe No. 2 vs. Jeffrey Epstein  
CASE NO: 08-CV-80119-MARRA/JOHNSON

Dear Mr. Epstein:

Please take notice that on March 8, 2008, you gave your deposition in the above-referred matter. At that time, you did not waive your signature. It is now necessary that you sign your deposition.

As previously agreed to, the transcript will be furnished to you through your counsel. Please read the following instructions:

At Page 335, you will find an errata sheet. As you read your deposition, any changes or corrections that you wish to make should be noted on the errata sheet, citing page and line number of said change. DO NOT write on the transcript itself. Once you have read the transcript and noted any changes, be sure to sign and date the errata sheet and return these pages to us at the address listed above. You need not return the entire transcript.

If you do not read and sign the deposition within thirty (30) days, the original, which has already been forwarded to the ordering attorney, may be filed with the Clerk of the Court. If you wish to waive your signature, sign your name in the blank at the bottom of this letter and return it to us.

Very truly yours,  
Universal Legal Reporting,

Vicki L. Lima  
Court Reporter - Notary Public

I do hereby waive my signature.

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ERRATA SHEET  
IN RE: Jane Doe No. 2 vs. Jeffrey Edward Epstein  
DEPOSITION OF: Jeffrey Edward Epstein, Volume II  
TAKEN: March 8, 2010  
DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE  
PAGE # LINE # CHANGE REASON

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Please forward the original signed errata sheet to this office so that copies may be distributed to all parties. Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.  
DATE: \_\_\_\_\_ SIGNATURE OF DEPONENT \_\_\_\_\_  
Job #92076-B

37 (Pages 334 to 335)



## Vehicle and Vessel Information

This information is for the following offender:



**JEFFREY E EPSTEIN**

EPSTEIN is registered as a Sexual Offender.

The following information reflects only those vehicles and/or vessels registered to or owned by the specific offender or predator. Please be aware that this individual may drive or operate vehicles or vessels other than those listed here.

### Vehicle Information

Vehicle Make: <b>CHEVROLET</b>	Vehicle Type: <b>AUTO</b>	Vehicle Color: <b>BLACK</b>
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Vehicle Year: <b>2004</b>	Vehicle Body: <b>UTILITY</b>	Tag Number: <b>441WEN</b>
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Vehicle Make: <b>CONTINENTAL</b>	Vehicle Type: <b>VEHICLE TRAILER</b>	Vehicle Color: <b>Not Available</b>
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Vehicle Year: <b>2004</b>	Vehicle Body: <b>TRAILER</b>	Tag Number: <b>196VBK</b>
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Vehicle Make: <b>MERCEDES-BENZ</b>	Vehicle Type: <b>AUTO</b>	Vehicle Color: <b>BLACK</b>
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Vehicle Year: <b>2005</b>	Vehicle Body: <b>2 DOOR</b>	Tag Number: <b>Not Available</b>
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Vehicle Make: <b>JEEP</b>	Vehicle Type: <b>AUTO</b>	Vehicle Color: <b>GREEN</b>
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Vehicle Year: <b>1987</b>	Vehicle Body: <b>UTILITY</b>	Tag Number: <b>J18VLH</b>
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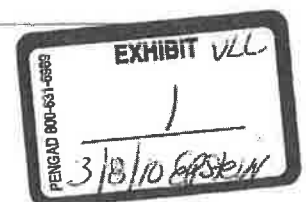
Vehicle Make: <b>CADILLAC</b>	Vehicle Type: <b>AUTO</b>	Vehicle Color: <b>BLACK</b>
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Vehicle Year: <b>2005</b>	Vehicle Body: <b>4 DOOR</b>	Tag Number: <b>Q299GT</b>
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Vehicle Make: <b>MERCEDES-BENZ</b>	Vehicle Type: <b>AUTO</b>	Vehicle Color: <b>GRAY</b>
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Vehicle Year: <b>2005</b>	Vehicle Body: <b>2 DOOR</b>	Tag Number: <b>X20BQZ</b>
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Vehicle Make: <b>HARLEY-DAVIDSON</b>	Vehicle Type: <b>MOTORCYCLE</b>	Vehicle Color: <b>BLACK</b>
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3/5/2010 10:25 AM

Vehicle Year: <b>1973</b>	Vehicle Body: <b>MOTORCYCLE</b>	Tag Number: <b>47857G</b>
Vehicle Make: <b>CHEVROLET</b>	Vehicle Type: <b>AUTO</b>	Vehicle Color: <b>BLACK</b>
Vehicle Year: <b>2001</b>	Vehicle Body: <b>2 DOOR</b>	Tag Number: <b>U11AFM</b>
Vehicle Make: <b>MERCEDES-BENZ</b>	Vehicle Type: <b>AUTO</b>	Vehicle Color: <b>BLACK</b>
Vehicle Year: <b>2002</b>	Vehicle Body: <b>4 DOOR</b>	Tag Number: <b>Not Available</b>
Vehicle Make: <b>HARLEY-DAVIDSON</b>	Vehicle Type: <b>MOTORCYCLE</b>	Vehicle Color: <b>GREEN</b>
Vehicle Year: <b>2000</b>	Vehicle Body: <b>MOTORCYCLE</b>	Tag Number: <b>63445F</b>
Vehicle Make: <b>FORD</b>	Vehicle Type: <b>AUTO</b>	Vehicle Color: <b>GREEN</b>
Vehicle Year: <b>1991</b>	Vehicle Body: <b>4 DOOR</b>	Tag Number: <b>Not Available</b>
Vehicle Make: <b>MERCEDES-BENZ</b>	Vehicle Type: <b>AUTO</b>	Vehicle Color: <b>BLACK</b>
Vehicle Year: <b>1992</b>	Vehicle Body: <b>4 DOOR</b>	Tag Number: <b>Not Available</b>
Vehicle Make: <b>HARLEY-DAVIDSON</b>	Vehicle Type: <b>MOTORCYCLE</b>	Vehicle Color: <b>UNKNOWN COLOR</b>
Vehicle Year: <b>1992</b>	Vehicle Body: <b>MOTORCYCLE</b>	Tag Number: <b>00601T</b>
Vehicle Make: <b>CHEVROLET</b>	Vehicle Type: <b>AUTO</b>	Vehicle Color: <b>WHITE</b>
Vehicle Year: <b>1991</b>	Vehicle Body: <b>STATION WAGON</b>	Tag Number: <b>Not Available</b>
Vehicle Make: <b>MERCEDES-BENZ</b>	Vehicle Type: <b>AUTO</b>	Vehicle Color: <b>RED</b>
Vehicle Year: <b>1986</b>	Vehicle Body: <b>2 DOOR</b>	Tag Number: <b>Not Available</b>
Vehicle Make: <b>ROLLS-ROYCE</b>	Vehicle Type: <b>AUTO</b>	Vehicle Color: <b>UNKNOWN COLOR</b>
Vehicle Year: <b>1991</b>	Vehicle Body: <b>4 DOOR</b>	Tag Number: <b>Not Available</b>

Vehicle Make:  
**MERCEDES-BENZ**

Vehicle Type:  
**AUTO**

Vehicle Color:  
**ALUMINUM / SILVER**

Vehicle Year:  
**1998**

Vehicle Body:  
**ROADSTER**

Tag Number:  
**RAS85L**

Vehicle Make:  
**MERCEDES-BENZ**

Vehicle Type:  
**AUTO**

Vehicle Color:  
**BLACK**

Vehicle Year:  
**1997**

Vehicle Body:  
**4 DOOR**

Tag Number:  
**Not Available**

Vehicle Make:  
**MERCEDES-BENZ**

Vehicle Type:  
**AUTO**

Vehicle Color:  
**BLACK**

Vehicle Year:  
**1999**

Vehicle Body:  
**4 DOOR**

Tag Number:  
**C194SP**

Vehicle Make:  
**VOLKSWAGEN**

Vehicle Type:  
**AUTO**

Vehicle Color:  
**BLUE**

Vehicle Year:  
**1964**

Vehicle Body:  
**CONVERTIBLE**

Tag Number:  
**IL020F**

Vehicle Make:  
**CHEVROLET**

Vehicle Type:  
**AUTO**

Vehicle Color:  
**BLACK**

Vehicle Year:  
**2001**

Vehicle Body:  
**UTILITY**

Tag Number:  
**F972TH**

Vehicle Make:  
**ROADSTER**

Vehicle Type:  
**AUTO**

Vehicle Color:  
**GREEN**

Vehicle Year:  
**1993**

Vehicle Body:  
**CONVERTIBLE**

Tag Number:  
**F970TH**

Vehicle Make:  
**FAST LOAD AUTO HAULERS**

Vehicle Type:  
**VEHICLE TRAILER**

Vehicle Color:  
**Not Available**

Vehicle Year:  
**2000**

Vehicle Body:  
**TRAILER**

Tag Number:  
**G172JC**

Vehicle Make:  
**MERCEDES-BENZ**

Vehicle Type:  
**AUTO**

Vehicle Color:  
**BLACK**

Vehicle Year:  
**2002**

Vehicle Body:  
**4 DOOR**

Tag Number:  
**C165SP**

Vehicle Make:  
**JEEP**

Vehicle Type:  
**AUTO**

Vehicle Color:  
**RED**

Vehicle Year:  
**1985**

Vehicle Body:  
**2 DOOR**

Tag Number:  
**G751913**

Vehicle Make:  
**BENTLEY**

Vehicle Type:  
**AUTO**

Vehicle Color:  
**BLACK**

Vehicle Year: 2006	Vehicle Body: 4 DOOR	Tag Number: V752DS
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Vehicle Make: CHEVROLET	Vehicle Type: AUTO	Vehicle Color: BLACK
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Vehicle Year: 2003	Vehicle Body: UTILITY	Tag Number: V99YEE
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**Vessel Information**

Vessel Make: YAMAHA MOTOR CORP USA	Vessel Type: PERSONAL WATERCRAFT (JETSKI)	Vessel Color: Not Available
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Motor Type: INBOARD	Hull Material: FBGlass	Vessel Year: 2002
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Registration Number:  
Not Available