



1 Q. Because Mr. Epstein never came to your
2 dad's house, correct?

3 A. Correct.

4 Q. And no one who worked for Mr. Epstein ever
5 did something to your dad's tires, did they?

6 MR. LEOPOLD: Objection. Lack of
7 foundation, predicate.

8 Don't guess.

9 BY MR. TEIN:

10 Q. It's not true that Mr. Epstein almost
11 killed your father, is it?

12 MR. LEOPOLD: Objection. Asked and
13 answered, lack of foundation, predicate.

14 BY MR. TEIN:

15 Q. You can answer.

16 A. No.

17 Q. Now you told the police that you didn't
18 know who was in the car with you and [REDACTED] on the day
19 you went to Epstein's house, didn't you?

20 A. Yes.

21 Q. And that was a lie, wasn't it?

22 A. It's the truth.

23 Q. You told the police that there was someone
24 in the car next to you and you specifically said you
25 didn't know her name, right?



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1 A. Correct. I do not know her name.

2 Q. You said, "I don't know her name, but she
3 was dark like a Spanish girl." Those were your words,
4 right?

5 A. Yes.

6 MR. LEOPOLD: Objection. Asked and
7 answered.

8 BY MR. TEIN:

9 Q. Who was in the car that day with you and
10 [REDACTED]?

11 A. Again, I do not know.

12 Q. It was your good friend [REDACTED]
13 wasn't it?

14 A. No. I don't know a [REDACTED]

15 Q. You lied to the police about who was in the
16 car with you and [REDACTED], didn't you?

17 A. Incorrect.

18 Q. Let me ask you some questions about who you
19 may have spoken to about this case. All right?

20 A. Go ahead.

21 Q. Did you speak to your twin sister [REDACTED]?

22 A. Not in detail, but of course she knows;
23 she's family. And yes.

24 Q. What's her e-mail?

25 A. I don't think she has an e-mail.

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1 Q. What is her phone number?

2 A. Oh, gosh. I don't know off the top of my
3 head.

4 Q. And what is her home address?

5 A. She lives with my mom.

6 Q. In Georgia?

7 A. Yes, sir.

8 Q. What about [REDACTED] boyfriend [REDACTED]? Did you
9 speak to him about Epstein's case?

10 A. That's my mom's boyfriend. My sister
11 doesn't have a boyfriend. My mom's husband's name is
12 [REDACTED] so maybe you get them confused.

13 Q. Do you know his phone number?

14 A. No.

15 Q. Where does he live?

16 A. With my mom.

17 Q. In the same house with her?

18 A. Yes. They're married.

19 Q. So not boyfriend; husband?

20 A. Yeah, husband.

21 Q. Have you spoken to [REDACTED] about
22 what happened in Mr. Epstein's house?

23 A. Not in detail, but he knows the basics,
24 yes.

25 Q. What is his e-mail?



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1 A. I don't know.

2 Q. What is his phone number?

3 A. How is that relevant?

4 Q. What is his phone number?

5 A. 561.719.2652.

6 Q. What is his home address?

7 A. I don't know.

8 Q. Where does he live?

9 A. In Palm Beach Lakes somewhere.

10 Q. Ever been to his house?

11 A. Yes.

12 Q. You don't know what his address is?

13 MR. LEOPOLD: Objection. Asked and
14 answered. She just said she doesn't know.

15 MR. TEIN: Don't coach.

16 MR. LEOPOLD: Objection. Asked and
17 answered.

18 BY MR. TEIN:

19 Q. You can answer the question.

20 A. I don't know the exact address.

21 Q. What street is it on?

22 A. It's an apartment complex; its not a
23 street.

24 Q. What's the name of the apartment complex?

25 A. Something Cove.

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1 Q. What apartment number is it?

2 A. I couldn't tell you.

3 Q. When was the last time you went there?

4 A. Just visited this past weekend. That's the
5 first and last time I went there.

6 Q. How about [REDACTED]? Have you spoken
7 to him about your case?

8 A. No. We no longer speak.

9 Q. What's his phone number? Actually, we
10 already have his phone number and e-mail.

11 How about [REDACTED]? Have you ever
12 spoken to her about your case?

13 A. I don't know an [REDACTED]

14 Q. Have you ever met [REDACTED]

15 A. No. But just to let you know, I don't
16 really know names. If you have pictures of there faces I
17 could tell you.

18 Q. All right. Let me see if I can refresh
19 your memory.

20 A. Okay.

21 Q. Does it refresh your memory that [REDACTED]
22 is the other girl who made allegations about Epstein, but
23 refused to show to the Grand Jury when she had to testify
24 about them under oath?

25 A. No, sir. I have no knowledge of any other



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1 girls in this whole situation. We're not allowed to know
2 each other.

3 Q. I didn't get the last four words.

4 A. We're not allowed to know each other.

5 Q. And what about [REDACTED] Have you
6 of met her?

7 A. No, sir.

8 Q. Let's see if I can refresh your memory on
9 her. She's the other person represented by your lawyer
10 Mr. Herman, who is suing Epstein for fifty million
11 dollars.

12 A. I have no knowledge of her.

13 Q. Never met her?

14 A. Never met her.

15 Q. [REDACTED]?

16 A. I don't know who that is either.

17 Q. A person named [REDACTED] who knows [REDACTED]?

18 Is that [REDACTED]?

19 A. I don't know, sir.

20 Q. Do you remember making a statement to
21 Detective Pagan that's in the police reports?

22 A. No, sir.

23 Q. Have you read the police reports in this
24 case?

25 A. Yes.

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1 Q. They're on the Internet, right?

2 A. Yes, I think.

3 Q. Were you surprised when the police reports
4 were released on the Internet containing your statements
5 that you had made to the police?

6 A. Yes.

7 Q. You didn't want to see that happen, right?

8 A. No.

9 Q. So you're saying you don't know a [REDACTED]
10 [REDACTED]?

11 MR. LEOPOLD: Objection. Asked and
12 answered.

13 BY MR. TEIN:

14 Q. Does it refresh your memory that he was
15 somebody who had gone to jail for drugs and car theft?

16 A. No, sir.

17 Q. Someone who knows [REDACTED]?

18 A. No.

19 Q. You don't know if he met with Detective
20 Recarey?

21 A. No, sir.

22 Q. How about [REDACTED]?

23 A. Yes, I remember. I know who that is.

24 Q. Did you ever speak to [REDACTED] about what
25 happened at Mr. Epstein's house?



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1 A. He knows what happened four years ago. He
2 doesn't know this is still going on today.

3 Q. What's his address? I'm sorry. I have his
4 address.

5 A. I don't know.

6 Q. How about [REDACTED]?

7 A. [REDACTED]?

8 Q. You know who that is?

9 A. I know who that is, yes.

10 Q. He's the one you stayed out drinking all
11 night one night last year when your dad reported you
12 missing?

13 A. No, sir.

14 Q. Remember the baseball game you were
15 supposed to go to?

16 A. No, sir.

17 Q. Did you speak to [REDACTED] about this
18 case?

19 A. No, sir.

20 Q. How about [REDACTED]?

21 A. That's my sister's ex-boyfriend.

22 Q. He's the one with the sawed-off shotgun
23 with the obliterated serial number?

24 A. Ask him. I would not know that
25 information.

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1 Q. Did you speak to [REDACTED] about this
2 case?

3 A. No, sir.

4 Q. Have you spoken to [REDACTED] about this
5 case?

6 A. No. I don't know who [REDACTED] is.

7 Q. Did your parents speak to [REDACTED]?

8 A. Ask my parents.

9 Q. Let's see if I can refresh your memory as
10 to who he is. Okay?

11 A. Uh-huh.

12 Q. He's the Vanity Fair reporter who made a
13 financial arrangement with your father.

14 A. I am aware of that. And again, I was not
15 aware like that my dad did it until after it was done.
16 And I don't know the details about that. I just know
17 what you know about that, like that they talked.

18 Q. Tell me what you know about the financial
19 arrangement that [REDACTED] the Vanity Fair reporter,
20 made with your father.

21 A. I don't know about the details at all.

22 Q. How much money did [REDACTED] give to
23 your father?

24 A. I don't even know he gave money to my dad.

25 Q. I'm sorry?

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1 A. I didn't even know he gave money to my dad.

2 Q. What do you know about the deal that [REDACTED]

3 [REDACTED] has with your father?

4 A. I only know they spoke on the telephone
5 once. I don't know anything else.

6 Q. When was that?

7 A. This was a while ago, a year or two -- or a
8 year ago. I honestly don't know.

9 Q. Did [REDACTED] the Vanity Fair
10 reporter, offer any money to your father?

11 A. I don't know.

12 Q. Did [REDACTED] the Vanity Fair
13 reporter, give you any money?

14 A. No, sir.

15 Q. Did he offer you any money?

16 A. No, sir. Never spoke to him.

17 Q. What reporters have you spoken to?

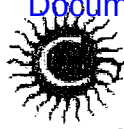
18 A. Zero.

19 Q. What about your family members? What
20 reporters have they spoken to?

21 A. The whole Palm Beach County, obviously, as
22 you can see in that newspaper.

23 Q. Tell me -- let's go through each one that
24 you remember. Other than the Vanity Fair reporter, [REDACTED]

25 [REDACTED] what other reporters have any member of your



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1 family spoken to?

2 A. I don't know. And I know my mom has spoken
3 to zero. My sister spoke to zero. My father and
4 stepmother, I wouldn't know. You'd have to ask them. I
5 don't contact them.

6 Q. Well, I just want to know -- I don't want
7 you to -- I want to know what's in your mind. All right?

8 MR. LEOPOLD: She just told you. She just
9 answered --

10 MR. TEIN: Be quiet.

11 BY MR. TEIN:

12 Q. What I want to know is what you know from
13 your personal knowledge. My question to you is: What
14 knowledge do you have about family members of yours
15 speaking to reporters?

16 MR. LEOPOLD: Objection. Asked and
17 answered.

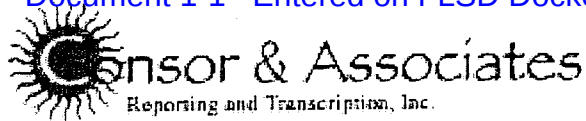
18 And if you can't talk professionally, we're
19 going to leave.

20 MR. TEIN: Do what you want to do.

21 MR. LEOPOLD: Are you going to continue to
22 talk this way?

23 MR. TEIN: I'm not going to answer any
24 question that you ask me, Mr. Leopold.

25 MR. LEOPOLD: Okay.



1 MR. TEIN: But you are misrepresenting the
2 record and you are grandstanding for your client
3 and it's wrong. So be quiet. And you know how to
4 make an objection. Make it. Otherwise stop
5 talking.

6 BY MR. TEIN:

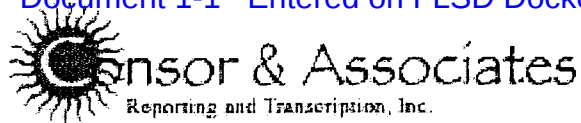
7 Q. [REDACTED]

8 MR. LEOPOLD: Excuse me.

9 MR TEIN: If you want to leave the
10 deposition, leave. But you'll be back here.

11 MR. LEOPOLD: Excuse me. If I could just
12 make the record, instead of interrupting me,
13 please. That's what we do professionally.
14 There's a recorder here. I'm certainly not being
15 obstructionist. I'm going to make the record.
16 But we're going to act with some semblance of
17 professionalism, hopefully, by all parties in the
18 room. That goes to me, that goes to your
19 co-counsel sitting behind you and next to you, the
20 court reporter and everyone else in the room.
21 Everyone is entitled to that.

22 You've asked a question. She answered the
23 question fully and she's not going to be harassed
24 because you don't like the answer. If you want to
25 follow up --



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1 MR. TEIN: Stop engaging me. Make your
2 speech and then we'll ask the questions.

3 MR. LEOPOLD: Well, you won't let me finish
4 making the objection, so it's difficult to do
5 that. But if you want to follow with an
6 appropriate question, feel free to do that. But
7 we're not going to harass the witness.

8 MR. TEIN: I disagree with everything
9 you've said. Let's ask the questions. Okay?

10 MR. LEOPOLD: Ask an appropriate question.

11 MR. TEIN: Are you going to stop talking?

12 MR. LEOPOLD: I'm going to make -- protect
13 my client and make appropriate objections. But
14 there's not a question pending right now.

15 BY MR. TEIN:

16 Q. [REDACTED] has [REDACTED] spoken to any reporters?

17 A. No.

18 MR. LEOPOLD: Objection. Asked and
19 answered.

20 BY MR. TEIN:

21 Q. Has [REDACTED] been given money by any
22 reporters?

23 A. No.

24 Q. Has your mom spoken to any reporters?

25 MR. LEOPOLD: Objection. Asked and



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1 answered.

2 THE WITNESS: No.

3 BY MR. TEIN:

4 Q. Has your mom's husband [REDACTED] spoken to any
5 reporters?

6 A. No.

7 Q. Has your mom's husband [REDACTED] received any
8 money from reporters?

9 A. No.

10 Q. Are you sure you don't know [REDACTED]?

11 MR. LEOPOLD: Objection. Asked and
12 answered.

13 THE WITNESS: I'm positive.

14 BY MR. TEIN:

15 Q. I'll try again to refresh your memory.

16 A. Okay.

17 Q. Does it refresh your memory that she had
18 been arrested for drugs and was cooperating with
19 Detective Recarey against Epstein to get herself a better
20 deal?

21 A. No. I don't know who she is.

22 Q. Have you spoken to anyone else who's been
23 at Epstein's house?

24 A. No.

25 Q. Without telling me what was said -- I don't

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1 want to know about any conversations with any lawyers,
2 okay --

3 A. Uh-huh.

4 Q. -- did you or your parents speak to any
5 other law firms besides Mr. Herman and Mr. Leopold's law
6 firms?

7 A. No.

8 Q. Now without telling me about anything that
9 was said, what -- did one just come to mind?

10 A. No. I was thinking about something else.

11 Q. What were you thinking about?

12 A. Does family court matter?

13 Q. Okay. Without telling me what was said,
14 who prepared you for today's deposition?

15 A. What do you mean prepared?

16 Q. Did you talk about this deposition, about
17 what would happen, with anybody?

18 A. Yes.

19 Q. Don't tell me what was said.

20 A. Okay.

21 Q. I'm not asking that. I don't want to know
22 that.

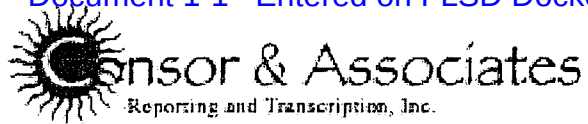
23 A. Okay.

24 Q. Who prepared you for today's deposition?

25 A. Mr. Leopold.

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1 Q. Anybody else?

2 A. No.

3 Q. When did you meet with Mr. Leopold to
4 prepare for today's deposition?

5 A. This morning.

6 Q. And how long did that meeting last?

7 A. Until it started.

8 Q. Now you told me that you previously had
9 read the police reports in this case?

10 A. Yes.

11 Q. Have you read your statement that you gave
12 to the police?

13 A. Yes, sir.

14 Q. And in what form was that statement?

15 A. What do you mean?

16 Q. Was it in the form of a police report or a
17 transcript?

18 A. What's the difference?

19 Q. A transcript has questions and answers on
20 it. A police report is just typed out narrative.

21 A. Oh, it's a police report.

22 Q. And when did you read the police report?

23 A. A few days ago. I overread it a few days
24 ago.

25 Q. Had you read it before that?



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1 A. No.

2 Q. Now you told me -- again, I don't want to
3 know what was said.

4 A. Uh-huh.

5 Q. You told me that you met with Mr. Leopold
6 this morning to prepare for your deposition, right?

7 A. Yes.

8 Q. When did you set up that meeting with
9 Mr. Leopold to take place this morning?

10 A. Gee, like, like five days ago, four days
11 ago.

12 Q. So you're aware that Mr. Leopold told us
13 that he could not start the deposition this morning
14 because he had a court appearance, correct?

15 MR. LEOPOLD: Don't answer that question.

16 Calls for attorney/client communications.

17 BY MR. TEIN:

18 Q. Have you seen the letter that Mr. Leopold
19 wrote to us stating that he -- an e-mail that Mr. Leopold
20 wrote to Mr. Goldberger stating that he could not be here
21 this morning because he had a court appearance? Did you
22 see that e-mail?

23 MR. LEOPOLD: You can answer that question.

24 THE WITNESS: No.

25



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1 BY MR. TEIN:

2 Q. Have you listened to your tape-recorded
3 statement to the police?

4 A. Yes.

5 Q. Where did you listen to that?

6 A. In, I think, this building. I don't know.
7 It was here.

8 Q. When did you listen to that statement?

9 A. This morning.

10 Q. And who was present when you listened to
11 that statement?

12 A. Mr. Leopold -- and I forget your name.

13 MR. GOLDBERGER: Ms. Belohlavek.

14 THE WITNESS: Ms. Belohlavek.

15 BY MR. TEIN:

16 Q. And you hadn't listened to your statement
17 before that, correct?

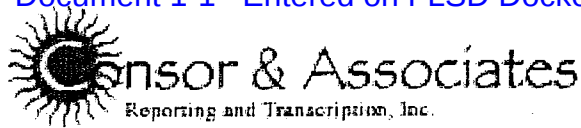
18 A. No, sir.

19 Q. Have you met with lawyers representing
20 anyone else suing Epstein?

21 A. No, sir.

22 Q. How many times have you spoken to officers
23 with the Palm Beach Police Department?

24 A. More than I like can count. It's been
25 ongoing for four years, so quite a few times.



1 Q. When was the last time you spoke with
2 officers of the Palm Beach Police Department?

3 A. A while ago. I'd say a year ago.

4 Q. A year ago?

5 A. Yeah. Maybe a year and a half.

6 Q. Do you remember Detective Recarey?

7 A. No.

8 Q. Do you remember Michelle Pagan, Detective
9 Pagan?

10 A. Yes.

11 Q. How many times have you spoken to Detective
12 Pagan?

13 A. She was the only one I spoke to about this
14 until for some reason she wasn't on the case anymore.

15 Q. When was that?

16 A. The first meeting I ever had was with her
17 and then I think like I met with her like 10 times or 12
18 times or something like that, and then I didn't get --
19 another investigator questioned me after that.

20 Q. And who was that?

21 A. I don't remember.

22 Q. And what type of questions did they ask
23 you?

24 A. The same.

25 Q. The same questions all over again?



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1 A. I'd have to say like a year and a half ago,
2 a year ago. It was a long time ago.

3 (Discussion held off the record.)

4 MR. TEIN: Tell me the last answer, please.

5 (Thereupon, a portion of the record was read
6 by the reporter.)

7 BY MR. TEIN:

8 Q. And who was present when the FBI spoke to
9 you at your father's house?

10 A. My stepmother was there, but she wasn't
11 around. She made herself like do other things.

12 Q. And how many FBI agents were there?

13 A. I think four.

14 Q. And you don't remember any of their names?

15 A. No, sir.

16 Q. And were there any lawyers there?

17 A. Not that I know of.

18 Q. And none of them gave you their cell phone
19 numbers?

20 A. No.

21 Q. And the last time you spoke to the FBI was
22 a year and a half ago?

23 A. It was a while ago.

24 MR. LEOPOLD: Objection. Asked and
25 answered.

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1 BY MR. TEIN:

2 Q. And the last time you spoke to the federal
3 prosecutor's office was when?

4 A. I don't know.

5 Q. Did any of the FBI agents tell you that
6 Marie Villafona had spoken with Mr. Leopold?

7 A. No.

8 Q. Did any of the FBI agents tell you that
9 Marie Villafona had spoken with Mr. Herman?

10 A. No.

11 Q. Did any FBI agents tell you that Jeff
12 Sloman spoke with Mr. Herman.

13 A. No.

14 Q. Did any FBI agents tell you that Jeff
15 Sloman spoke with Mr. Leopold?

16 A. No.

17 Q. Do you know whether any of the federal
18 prosecutors allowed Mr. Herman to review a draft
19 indictment?

20 A. I wouldn't know.

21 Q. Do you know if any of the federal
22 prosecutors discussed a draft indictment with Mr. Herman?

23 A. I wouldn't know.

24 Q. Have you ever e-mailed with any FBI agent
25 or any federal prosecutor?



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1 A. No.

2 Q. Have you ever text messaged with any FBI
3 agent or any federal prosecutor?

4 A. No.

5 Q. Has the FBI told you about other testimony?

6 A. No.

7 Q. Has the FBI told you about what other girls
8 have said?

9 A. No.

10 Q. Have federal prosecutors told you what
11 other girls have said?

12 A. No.

13 Q. Do you have any way of getting in touch
14 with the FBI if you wanted to get in touch with them?


15 A. No.

16 Q. How about your parents? Do they know how
17 to get in touch with the FBI?

18 A. I don't know.

19 Q. And by your parents, I'm referring to both
20 sets, okay?

21 A. Oh. Well, I'm referring to only my dad,
22 because my mom really doesn't care to know any of this
23 stuff.

24 Q. So the answer would be the same for your
25 mom and 



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1 A. Yeah.

2 Q. Have you spoken to a lawyer named Burt
3 Ocariz about this case?

4 A. No.

5 Q. Do you know who Burt Ocariz is?

6 Let's see if I can refresh your memory.

7 Does it refresh your memory that he's a good friend of
8 Marie Villafona's boyfriend?

9 A. I don't know who Marie Villafona is.

10 Q. Marie Villafona is the lead federal
11 prosecutor that's on the federal part of this case.
12 Okay?

13 A. No.

14 Q. So does it refresh your memory that Ocariz
15 is the good friend of Marie Villafona's boyfriend?

16 A. Not at all.

17 Q. Does it refresh your memory that Villafona
18 tried to get Epstein to pay for Ocariz to represent you
19 in the federal case?

20 A. No.

21 Q. Do you know if Detective Recarey has spoken
22 with your father?

23 A. No.

24 Q. Do you know if Detective Recarey has spoken
25 to your stepmother?



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1 First off, this is not a warehouse. This
2 is in [REDACTED] garage.

3 Second of all, I'm not being gang-raped.
4 Everyone has their clothing on.

5 Thirdly, if you'd look at all the other
6 pictures in that album, I'm drinking -- what's
7 when you're sick you drink it?

8 BY MR. TEIN:

9 Q. You can't ask questions of your counsel.

10 A. All right. I'm drinking like Sprite. I'm
11 not drinking any kind of alcohol, if you would look at my
12 other pictures in that album.

13 You guys picked the possibly worst pictures
14 out of there to present. And it was just a goofy
15 picture. All of these kids like to be goofy. And that's
16 what we were doing.

17 Q. Who's the man on the left of the picture
18 holding his -- holding a beer bottle as if it were a
19 penis towards your mouth?

20 A. [REDACTED]

21 Q. Who's the man behind you, right up towards
22 your backside, with you bent over?

23 A. That one?

24 Q. The right side, kissing with his mouth.

25 A. That's [REDACTED]



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1 Q. He's the one grabbing towards the groin

2 area of [REDACTED]

3 A. Yes.

4 Q. And there's three other men in the photo.

5 What are their names? The one on the left with the hat?

6 A. That's [REDACTED] (phonetic).

7 Q. Smiling?

8 A. Yes.

9 Q. Who's the one kissing --

10 MR. LEOPOLD: Don't interrupt. Let her

11 finish the record. She's testifying.

12 MR. TEIN: I know you don't like this

13 picture, my friend.

14 MR. LEOPOLD: The picture is fine.

15 BY MR. TEIN:

16 Q. Who's the one with the hat?

17 MR. LEOPOLD: No. Hold on. Stop, [REDACTED]

18 You have to let the witness finish her

19 answer. She was in the process of explaining and

20 you cut her off.

21 Please finish what you were saying and then

22 Counsel can ask you whatever he wishes after that.

23 THE WITNESS: Okay. This guy --

24 MR. LEOPOLD: Just make it so the record is

25 clear who you're referring to.

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1 THE WITNESS: -- on the far left is [REDACTED]

2 [REDACTED]

3 BY MR. TEIN:

4 Q. He's the one whose head is near the groin
5 of [REDACTED] right?

6 A. Yes.

7 Q. And in the middle there's a man smiling.
8 Who's that?

9 A. That's [REDACTED]

10 Q. And who's the one in the red hat, kissing?

11 A. That's [REDACTED] (phonetic).

12 Q. Let me stop you for a second. Are you
13 done?

14 A. Yes, I'm done.

15 Q. Who is [REDACTED]?

16 A. My sister's friend. Well, she's a mutual
17 friend, but more my sister's.

18 Q. What is her last name?

19 A. [REDACTED]

20 Q. Spell that.

21 A. I don't know how to --

22 Q. Have you spoken to her about this case?

23 A. No.

24 Q. Who's [REDACTED]

25 A. My sister's friend. I don't really speak

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1 to him at all.

2 Q. What's his last name?

3 A. [REDACTED]

4 Q. [REDACTED]

5 A. [REDACTED]

6 Q. And have you spoken to [REDACTED] about this
7 case?

8 A. No, sir.

9 Q. Have you spoken to [REDACTED] about this case?

10 A. Not in detail, but yes.

11 MS. BELOHLAVEK: Are we referring to

12 [REDACTED]?

13 THE WITNESS: Yes.

14 MR. TEIN: Yes.

15 MS. BELOHLAVEK: Okay.

16 BY MR. TEIN:

17 Q. Have you spoken to [REDACTED] about this case?

18 A. [REDACTED]?

19 Q. Do you have a friend named [REDACTED]

20 A. I do not have a friend named [REDACTED]

21 Q. From freshman year?

22 A. No.

23 Q. How about [REDACTED]

24 A. No.

25 Q. Have you spoken to [REDACTED] about this case?

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1 A. No.

2 Q. What's her last name?

3 A. [REDACTED] I don't know how to spell it.

4 Q. Is she the person whose house you went to
5 on New Year's this year?

6 A. No. I wasn't at her house on New Year's.

7 Q. Where were you when you took the picture of
8 "Can you say blazed," that's on your website?

9 A. I wouldn't know or -- wait. We were at a
10 birthday party for some girl's 16th birthday.

11 Q. Were you drinking at that party?

12 A. No. There was no alcohol or anything
13 there.

14 Q. What does "blaze" mean to you?

15 A. It's like -- it just means like messed up.
16 But we weren't, if you look at the picture.

17 Q. Messed up like drunk, right?

18 A. Sure.

19 Q. Who's [REDACTED]?

20 A. A girl I know, like from like two years
21 ago.

22 Q. She's the one you were supposed to be
23 staying with when you went drinking with [REDACTED]?

24 A. No.

25 Q. What's [REDACTED] last name?

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1

A. [REDACTED]

2

Q. Where does she live?

3

A. I don't know. In Royal Palm.

4

Q. [REDACTED]

5

A. Uh-huh. I'm guessing.

6

Q. Do you know her phone number?

7

A. No, I do not.

8

Q. Let's look at 25-010.

9

A. See, I'm drinking --

10

Q. I'm not asking you about what you're

11

drinking.

12

Who are the men in this photo who are

13

pretending to gang up on you and stab you with knives?

14

Who are they?

15

A. [REDACTED] and [REDACTED]

16

Q. Are these firemen?

17

A. Are those? [REDACTED] -- he said the

18

two stabbing with knives. That's why I said that. I

19

don't know. That's [REDACTED] and [REDACTED]

20

Q. Are these firemen?

21

A. No. They're all on -- except [REDACTED]

22

they're all on full rights for football.

23

Q. Go to 025-015.

24

MR. LEOPOLD: 025 dash?

25

MR. TEIN: 015.

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1 THE WITNESS: Gosh, that's so long ago.

2 BY MR. TEIN:

3 Q. Who took the photo of you licking the
4 penis?

5 A. My stepmother.

6 Q. Whose idea -- that was your stepmother's
7 idea?

8 A. It was in Buca di Beppo, where she works
9 currently, and that was before she worked there. And we
10 just thought it would be funny.

11 MR. TEIN: 19-007. Can you enlarge that?

12 BY MR. TEIN:

13 Q. Who took this photo of you simulating you
14 having sex with a man?

15 A. We're not simulating having sex, and
16 it's -- oh, and the person who took it was, I'm pretty
17 sure, [REDACTED] but I know him as [REDACTED] I don't know his
18 last name.

19 Q. Go to 19-006, please.

20 Who took this photo of you simulating sex
21 with a man?

22 A. The same person. And we're not simulating
23 having sex, Mr. --

24 Q. Tein.

25 Did you post that on the Internet?

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1 A. Actually, this is an old MySpace I never
2 finished and I never like did anything. I just kind of
3 made it and left it.

4 Q. So the answer is yes, you posted this on
5 MySpace?

6 A. Yup.

7 Q. Go to 25-016. Who took this photo of you
8 simulating sex with a woman?

9 MR. LEOPOLD: Object to the form of the
10 question. Argumentative.

11 THE WITNESS: First off, she's piercing my
12 belly button or repiercing it, and I'm pretty sure
13 it was just like we put up a camera somewhere and
14 put a timer on it. We didn't have anybody take
15 it.

16 BY MR. TEIN:

17 Q. You posted that on your MySpace page?

18 A. Yeah.

19 Q. Go to 25-013. Is that a photo of you?

20 A. Yep.

21 Q. Who's in the photo with you?

22 A. [REDACTED]

23 Q. [REDACTED]

24 A. Yep.

25 Q. Is this you coming out of the shower?



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1 A. Yes.

2 Q. Are you clothed in this picture?

3 A. Yeah. I have a halter dress on.

4 Q. Where is that picture taken?

5 A. In [REDACTED] house.

6 Q. Did you post that on the Internet?

7 A. Yes.

8 Q. All right.

9 MR. TEIN: You can take that down.

10 BY MR. TEIN:

11 Q. Now your boyfriend is [REDACTED]

12 correct?

13 A. Yeah.

14 Q. You lie about your age in order to conceal

15 something about your relationship with [REDACTED]

16 isn't that correct?

17 A. No.

18 Q. [REDACTED] 22 years old, isn't he?

19 A. Yes.

20 Q. And [REDACTED] is a firefighter with the Palm

21 Beach Fire Department, right?

22 A. Yup.

23 Q. Does the Palm Beach Fire Department know

24 that your boyfriend is dating an underage girl?

25 A. Actually, mister, it's legal.

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1 Q. Well --

2 MR. LEOPOLD: Just answer the question,

3 [REDACTED]

4 THE WITNESS: Yes.

5 BY MR. TEIN:

6 Q. Did they know two weeks ago that you were
7 dating an underage girl (sic)?

8 A. Yes. I met everybody in there.

9 Q. Did they know your age?

10 A. Yes.

11 Q. Did you lie about your age so that the fire
12 department wouldn't think that [REDACTED] is committing a
13 crime by having a sexual relationship with an underage
14 girl?

15 MS. BELOHLAVEK: Objection. Assumes facts
16 not in evidence.

17 BY MR. TEIN:

18 Q. You can answer the question.

19 A. No.

20 Q. Does the Palm Beach Police Department know
21 that [REDACTED] is having a sexual relationship with an
22 underage girl?

23 MR. LEOPOLD: Don't guess. Answer if you
24 know.

25 THE WITNESS: Can you repeat the question?



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1 BY MR. TEIN:

2 Q. Does the Palm Beach Police Department know
3 that [REDACTED] a member of the Palm Beach Fire Department,
4 is having a sexual relationship with an underage girl?

5 A. I'm guessing no.

6 Q. You lie about your twin sister [REDACTED] don't
7 you?

8 MR. LEOPOLD: Objection. Argumentative.

9 BY MR. TEIN:

10 Q. Don't you?

11 A. No. I have never lied for or to [REDACTED]

12 Q. You lie about the fact that she has a drug
13 habit, right?

14 A. No. I would never accuse my sister of
15 having a drug habit.

16 Q. Do you try to conceal the fact that she has
17 a drug habit?

18 MR. LEOPOLD: Objection. Argumentative.

19 BY MR. TEIN:

20 Q. You can answer the question.

21 A. No. My sister does not have a drug habit.

22 Q. You lied when you went to the crack house
23 in Georgia, didn't you?

24 MR. LEOPOLD: Objection. Argumentative.

25 Lack of foundation, lack of predicate.

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1 THE WITNESS: Never -- what did you say?

2 BY MR. TEIN:

3 Q. You lied when you went to the crack house
4 in Georgia, didn't you?

5 MR. LEOPOLD: Objection. Argumentative.

6 Lack of foundation, lack of predicate.

7 BY MR. TEIN:

8 Q. You can answer the question.

9 A. I have never been to a crack house.

10 Q. Who don't you lie to?

11 MR. LEOPOLD: Objection. Argumentative.

12 Don't answer the question.

13 MR. TEIN: Certify it.

14CERTIFIED QUESTION.....

15 BY MR. TEIN:

16 Q. You don't lie to [REDACTED] do you?

17 MR. LEOPOLD: Objection. Asked and
18 answered.

19 Don't answer the question.

20 BY MR. TEIN:

21 Q. No. You can answer that question.

22 MR. LEOPOLD: No. I just told her not to.
23 You've asked that question about five --

24 MR. TEIN: No, I haven't.

25 MR. LEOPOLD: Don't answer the question.

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1 MR. TEIN: I'll certify it.

2CERTIFIED QUESTION.....

3 MR. LEOPOLD: For the record, you have to
4 stop interrupting me because she can't take down
5 both of us talking at the same time.

6 BY MR. TEIN:

7 Q. You tell [REDACTED] the truth, don't you?

8 A. Excuse me?

9 Q. You tell [REDACTED] the truth, don't you?

10 A. When it's -- yes, I tell [REDACTED] the truth.

11 Q. Who's [REDACTED] drug dealer?

12 A. My sister does not have a drug dealer. She
13 lives in Georgia with my mother.

14 Q. Okay. Who is the drug dealer who dropped
15 you and [REDACTED] off at 5:45 a.m., in 2006, after being out
16 all night, the two of you, using drugs at Palm Beach
17 Country Estates where your father called the police?

18 A. [REDACTED]

19 Q. He's the drug dealer?

20 A. He is a drug dealer.

21 Q. Do you remember [REDACTED] was arrested by the
22 Palm Beach Police Department and taken to the Juvenile
23 Assessment Center that morning?

24 A. I do remember that.

25 Q. Now before you massaged Epstein, you were



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1 involuntarily admitted into a juvenile educational
2 facility; isn't that right?

3 A. Did you say involuntarily?

4 Q. Yes.

5 A. No. I was willing to go. I -- duly said
6 sure.

7 Q. And you went there because you were lying
8 so much, no one could control you; isn't that correct?

9 A. That's very incorrect.

10 Q. Now you lie to your parents all the time,
11 don't you?

12 A. Incorrect.

13 MR. LEOPOLD: Objection. Argumentative.

14 BY MR. TEIN:

15 Q. Sorry?

16 A. Incorrect.

17 Q. The day you went to Epstein's house you
18 lied to your father about where you were going; isn't
19 that correct?

20 A. Correct.

21 Q. You admitted to the police that you told
22 your father that you were going shopping, didn't you?

23 A. Yes.

24 Q. And that was a lie, wasn't it?

25 A. Yes.



1 Q. And isn't it true that your father has
2 accused you of lying?

3 A. All the time.

4 Q. Didn't your father throw you out of the
5 house Thanksgiving of this past year because you were
6 lying so much to him?

7 A. Yes, he did kick me out. No, that's not
8 the reasons why.

9 Q. Didn't your father throw your sister [REDACTED]
10 out of the house, too?

11 A. Yes.

12 Q. And he threw her out of the house the week
13 after Thanksgivings, right?

14 A. I don't know the date, but sure.

15 Q. Sounds about right?

16 A. Sure.

17 Q. And the reason he threw her out of the
18 house was because she was lying, too?

19 MR. LEOPOLD: Objection. Lack of
20 foundation. Calls for speculation.

21 BY MR. TEIN:

22 Q. When your counsel coaches you, you say it's
23 correct, right?

24 A. I've never been coached.

25 MR. LEOPOLD: Objection.



1 BY MR. TEIN:

2 Q. Okay. When your counsel that it was there
3 was lack of foundation, you agree with your counsel,
4 right?

5 A. I was like saying, "Yeah, let's move on,"
6 because there was no point to asking that question.

7 Q. Your father threw [REDACTED] out of the house
8 because she was lying, correct?

9 MR. LEOPOLD: Objection. Lack of
10 foundation.

11 Hold on, [REDACTED] Let me just make the
12 objection.

13 Lack of foundation, predicate, calls for
14 speculation.

15 BY MR. TEIN:

16 Q. Answer.

17 A. I'm not my sister. I don't know.

18 Q. I want to know what you know only.

19 A. I don't know.

20 Q. You don't know. That's your answer?

21 A. Yes.

22 Q. Now your parents filed the police report
23 regarding Mr. Epstein, right?

24 A. Yes.

25 Q. Now your parents are also lying, aren't



1 they?

2 A. Yes.

3 MR. LEOPOLD: Just so the record is clear,
4 the father -- because the mother was up north.

5 MR. TEIN: Don't testify, Counsel.

6 MR. LEOPOLD: So the record is clear, just
7 the father. The mother was --

8 MR. TEIN: Counsel, don't coach and
9 testify, please. That's absolutely improper.

10 MR. LEOPOLD: You just asked the wrong
11 question.

12 MR. TEIN: You can't coach her that way and
13 you well know it.

14 MR. LEOPOLD: For the record, it's the
15 father. He's remarried, I think on his third
16 marriage.

17 MR. TEIN: You cannot -- it's absolutely,
18 totally against the rules and you know it.

19 MR. LEOPOLD: The natural mother lives in
20 Georgia.

21 MR. TEIN: You need to behave yourself,
22 lawyer.

23 MR. LEOPOLD: The natural mother lives in
24 Georgia. The father is here locally.

25 MR. TEIN: Stop coaching. Stop talking.



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1 You object. You know the rules. You just
2 lectured me about the rules, Counsel. So why
3 don't you play by the rules? Or only when they
4 fit you? Why don't you grandstand a little more
5 now. Give us a five-minute speech, Mr. Leopold.

6 MR. LEOPOLD: Are you finished, for the
7 record?

8 MR. TEIN: I'm not talking to you. Do what
9 you want.

10 MR. LEOPOLD: Don't say anything yet.

11 BY MR. TEIN:

12 Q. [REDACTED] your parents --

13 MR. LEOPOLD: Hold it. Don't say anything
14 yet. Let me --

15 BY MR. TEIN:

16 Q. Your parents, who filed the police report
17 are also liars.

18 MR. LEOPOLD: Don't answer the question.
19 We're not going to answer until I make the record.
20 I want to put on the record, now that Counsel
21 appears to be finished with his comments for the
22 record, that the previous question was
23 inappropriate, was intentionally misleading.

24 Now you can ask the question.

25 BY MR. TEIN:



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1 Q. Your parents, who filed the police report
2 in this case, are also proven liars, aren't they?

3 MR. LEOPOLD: Same objection.

4 BY MR. TEIN:

5 Q. Aren't your parents liars?

6 MR. LEOPOLD: Calls for speculation. Lack
7 of predicate.

8 MR. TEIN: Stop coaching. You know what
9 that is, Leopold.

10 MR. LEOPOLD: Calls for speculation. Lack
11 of foundation.

12 THE WITNESS: When you say parents, my mom
13 is not, but sure, yeah, my dad has been to jail
14 for lying.

15 BY MR. TEIN:

16 Q. Your dad went to federal prison for two
17 years for lying, right?

18 A. Correct.

19 Q. Did he tell you it was for a financial
20 fraud?

21 A. Yes.

22 Q. For stealing money from some financial
23 institution?

24 A. Correct.

25 Q. And do you think your father is trying to



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1 steal your lawsuit money away from you?

2 Don't look to your lawyer for the answer.

3 MR. LEOPOLD: You can answer if you know
4 the answer to it. I have no idea.

5 THE WITNESS: Yeah.

6 BY MR. TEIN:

7 Q. And your father filed a lawsuit, the first
8 lawsuit for fifty million dollars against Mr. Epstein
9 without consulting you, correct?

10 A. Correct.

11 Q. And your father had a lawyer file the first
12 lawsuit on your behalf for fifty million dollars against
13 Mr. Epstein without your knowledge, correct?

14 A. Correct.

15 Q. And you don't trust your father, do you?

16 A. Correct.

17 Q. And you believe he's trying to manipulate
18 you for his own gain, don't you?

19 A. Sort of.

20 Q. Well, you know that your mother filed a
21 statement, an affidavit, saying that you don't trust your
22 father and that you believe he's trying to manipulate you
23 for his own gain; isn't that correct?

24 A. Correct.

25 Q. You agree with that statement, don't you?



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1 A. Uh-huh. Yes.

2 Q. Do you trust your stepmother?

3 A. My stepmother, no.

4 Q. You think she's also trying to steal your
5 Epstein lawsuit money away from you, don't you?

6 A. I would like to clarify something. You
7 keep saying my Epstein lawsuit money. I don't have any
8 money, and it's just a lawsuit at the moment. So I just
9 don't trust her.

10 Q. Okay. You think that your stepmother is
11 trying to take advantage of this lawsuit to try to get
12 money from Mr. Epstein that belongs to you, right?

13 A. Yes.

14 Q. Did your stepmother tell you why she was
15 arrested?

16 A. No.

17 Q. Did your stepmother tell you that she's
18 ever been arrested?

19 A. No.

20 Q. Did she tell you she was arrested for
21 fraud?

22 A. Never.

23 Q. Did she tell you that she was fired from
24 Hawthorne Aviation?

25 A. No.

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1 Q. Did she tell you that she was fired from
2 Hawthorne Aviation for stealing?

3 A. No.

4 MR. TEIN: Let's take a break.

5 (Thereupon, a recess was taken.)

6 BY MR. TEIN:

7 Q. [REDACTED] before you met Jeffrey Epstein, had
8 you ever had sexual intercourse?

9 A. Yes, yeah.

10 Q. How many times?

11 A. Just a few. Twice.

12 Q. With how many different men?

13 A. Two.

14 Q. How old were they?

15 A. [REDACTED] being one year older than me,
16 and then the other person was two years older than me.

17 Q. What was his name?

18 A. [REDACTED]

19 Q. How old were you when you first had sexual
20 intercourse?

21 A. 14.

22 Q. How many -- before you met Epstein, how
23 many different men had you had any type of sexual
24 activity with?

25 A. Just those two.



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1 Q. Are you saying you never kissed a man other
2 than those two?

3 MR. LEOPOLD: Objection to the form of the
4 question.

5 THE WITNESS: Yes, I had kissed people
6 before.

7 BY MR. TEIN:

8 Q. Before you met Epstein, had you ever had
9 oral sex?

10 A. No.

11 Q. Ever in your life, have you exchanged sex
12 for something of value?

13 A. No.

14 MR. TEIN: We're done.

15 THE WITNESS: Oh, okay.

16 MR. LEOPOLD: We'll read.

17 MS. BELOHLAVEK: I don't have any
18 questions. Thank you.

19 MR. LEOPOLD: Before we go off the record,
20 it's my understanding -- Mr. Goldberger can
21 correct the record -- but we have stipulated that
22 color copies of the documents that were identified
23 for identification certainly will be attached to
24 the deposition and counsel will be taking the
25 photographs across street so that they can be



1 laser color copied so that we have a copy, and I'm
2 assuming he'll get a copy to the court reporter,
3 too, to attach, actually a certified copy to the
4 deposition.

5 MR. GOLDBERGER: Done.

6 MR. LEOPOLD: That's if you agree to that.
7 If not, then I want to pull each one out and put
8 exhibit labels on them, which we should do before
9 we leave.

10 MR. GOLDBERGER: We're not going to do
11 either. I'll have copies sent to the court
12 reporter and she can attach them to the
13 deposition.

14 MR. LEOPOLD: So you're not going to agree
15 to what we talked about during the break then.

16 MR. GOLDBERGER: I'm not quite sure what
17 your asking me to do. Let me finish.

18 MR. LEOPOLD: Okay. Sure. That's fine.

19 MR. GOLDBERGER: Okay. If you want me to
20 go over to Ms. Belohlavek's office and make copies
21 and then I'll give those to the court reporter,
22 fine. All I'm saying is that I would avoid that
23 process. I would send copies to the court
24 reporter. But if it will make you happier --

25 MR. LEOPOLD: I'm not?



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1 MR. GOLDBERGER: Let me finish.

2 MR. LEOPOLD: I'm not interrupting now.

3 MR. GOLDBERGER: But if it will make you
4 happier if I go over to Ms. Belohlavek's office
5 and make a copy of those photos that were part of
6 this deposition and then I'll give them to the
7 court reporter, I'll be happy to do it.

8 MR. LEOPOLD: I trust you implicitly,
9 however you wish to do it. However, the
10 documents, before they leave this room, need to
11 have an exhibit sticky on them with the
12 appropriate --

13 MR. GOLDBERGER: Want to go get some? We
14 don't have any.

15 MR. LEOPOLD: I will do that. Excuse me.
16 Let me finish the record, please. You can't do
17 that to the court reporter. She's going to stroke
18 out. You can't do that. You have to let me --

19 MR. TEIN: Finish your sentence, Ted. You
20 are the most long-winded lawyer I've ever seen in
21 my life. Finish your sentence.

22 MR. LEOPOLD: Jack, tell him not to raise
23 his voice, please.

24 MR. TEIN: Finish your sentence. Is there
25 going to be a period at the end of the sentence or



1 is it just going to be comma after comma after
2 comma?

3 Go ahead, lawyer.

4 MR. LEOPOLD: All right. The exhibits, I
5 can't prevent you from taking them, but I will
6 object and I will be bringing it to the court for
7 sanctions. You cannot take the exhibits out of
8 the room without them being marked. I want them
9 marked, because you cannot identify in the record
10 what was used. And with all due respect to
11 Mr. Goldberger, I do not -- the way this
12 deposition is going, I do not want to rely on
13 Counsel from Miami to mark the appropriate
14 exhibits. I will not do that. I cannot prevent
15 you from taking them. But if you do, I will be
16 bringing the matter to the court with appropriate
17 sanctions, because that is improper. That is
18 improper. When you use something in a deposition,
19 they are to be marked. And you have refused to do
20 that throughout for what ever reason.

21 MR. TEIN: You're wrong. Finish your
22 sentence because you're talking about something
23 you have no idea.

24 Every single one is marked, Ted. Every
25 single one is already marked. But you want to



1 argue about everything. Ever single one is
2 already marked. Isn't that silly, Ted?

3 MR. GOLDBERGER: Thirty years of doing this
4 and I have never had an argument over this.

5 MR. TEIN: You've made -- Ted, you are
6 obstructionist, you are a liar. You have lied and
7 misrepresented things, for the record. You are
8 grandstanding.

9 MR. LEOPOLD: You need to back up.

10 MR. TEIN: No, no. I'm going to finish.

11 MR. LEOPOLD: You can finish, but don't
12 hover over me.

13 MR. TEIN: No one is hovering over you.
14 Stop trying to make a lying record.

15 Let me say something else.

16 Don't you dare threaten me with sanctions,
17 after you lied in a letter to my co-counsel about
18 the fact -- be quiet. Be quiet and let me finish.
19 You lied in a letter to my co-counsel,
20 Mr. Leopold, in which you said -- it was a
21 complete and utter lie -- that you were
22 unavailable this morning because you had a
23 hearing. That was a lie. I have never seen a
24 lawyer deign to do something like that.

25 So you will get the ex -- be quiet. Let me



Page 127

1 finish. You behave.

2 MR. LEOPOLD: Don't point your finger at
3 me.

4 MR. TEIN: Listen. Be quiet and I won't
5 have a need to point it at you.

6 MR. LEOPOLD: Don't point your finger at --

7 MR. TEIN: Mr. Leopold --

8 MR. LEOPOLD: Don't point your finger at
9 me.

10 MR. TEIN: Mr. Leopold, let me finish.

11 MR. LEOPOLD: Don't raise your voice
12 either.

13 MR. TEIN: Mr. Leopold --

14 MR. LEOPOLD: Jack, do you want to take
15 care of this?

16 MR. TEIN: Let me finish my sentence. The
17 exhibits are marked. We are walking out of here.

18 You are someone who misrepresents the
19 record. It is absolutely atrocious what you do.
20 That is not how a lawyer should behave. This
21 deposition is over. You will get your exhibits,
22 Mr. Leopold.

23 MR. GOLDBERGER: I understand what you're
24 saying, Michael, and I understand Ted's position.

25 Just so there's -- we're going to have lots



1 of issues in this case. We're going to have lots
2 of reasons to disagree.

3 I'm going to take it over now and I'm going
4 to make copies and I'm going to give them to
5 Ms. Consor. If you want to go find some exhibit
6 labels and put some exhibit labels on it, be my
7 guest. But that's what I'm offering to do.

8 THE WITNESS: Let me say two things,
9 because I am happy to always disagree, and with
10 you, I have no problem; we could always do it
11 professionally. I have not problem.

12 I want to say two things so the record is
13 very clear.

14 Since for whatever reason I have not been
15 able to look at exhibits, because they have been
16 refused to have been shown to me --

17 MR. TEIN: That's a lie.

18 MR. LEOPOLD: -- Jack, if you represent
19 that the documents have the appropriate exhibit
20 numbers or some identifying markings, 25, 30.000,
21 whatever they may be, then you can take them, make
22 copies, send me a copy, make sure the court
23 reporter gets a copy and then send me a bill for
24 my copies, that's fine. I didn't know that they
25 are marked that way because I haven't been able to



1 look at them.

2 MR. GOLDBERGER: They are barcoded, and the
3 number that we've made reference to in the
4 deposition coincides with the barcoding.

5 MR. LEOPOLD: That's fine. Eight by eleven
6 color laser copies are fine.

7 MS. BELOHLAVEK: The State Attorneys Office
8 is not going to charge anybody for color copies I
9 print out.

10 MR. LEOPOLD: That's fine. He's going to
11 take them back to his office.

12 Secondly -- and I will be more than happy
13 to do it, because it sounds like you all know more
14 about it than I -- but I'm happy to get affidavits
15 from Mr. Pincus, Judge Stern, everybody else about
16 what happened with this hearing today, because I
17 know very little about it. But my representations
18 are what they are.

19 MR. GOLDBERGER: They stay --

20 MR. LEOPOLD: Let me just finish for the
21 record.

22 My representations or comments about what
23 happened, representation about this hearing this
24 morning, I know very little about it. I --

25 MR. GOLDBERGER: I'll take your word on



1 that.

2 MR. LEOPOLD: No, no, no. I just put it on
3 the record. I will get an affidavit -- I'm
4 assuming it sounds like you need it -- from Mr.
5 Pincus. I have no clue about what happened and
6 why it was canceled. All I was told when I was
7 out of town yesterday was that the hearing this
8 morning was cancelled.

9 MR. GOLDBERGER: I'll take your word for
10 it.

11 MR. LEOPOLD: If you want an affidavit,
12 I'll get it for you.

13 MR. GOLDBERGER: It's a personal issue for
14 me because I had to disrupt a vacation and if it
15 was done just because it wasn't convenient for
16 you, then I'm offended by that. But if you're
17 telling me that it was planned and it didn't
18 happen, I'll take your word for it.

19 MR. LEOPOLD: I am more than happy to get
20 you an affidavit, because I don't know the reason
21 why it was canceled other than the fact that I'm
22 assuming since my deposition was taken for four
23 hours on Monday for preparation for the hearing
24 today, for whatever reason it was canceled, I am
25 told it is being re-noticed. Why it was canceled,



1 I have no idea, but if your co-counsel wishes an
2 affidavit to that effect from Mr. Pincus, I'm more
3 than happy to get it. But I don't know the reason
4 why it was canceled.

5 MR. TEIN: I don't need it. But what I do
6 take issue with is regardless of why it was
7 canceled, you owed us the courtesy of saying, You
8 know what? We can start earlier this morning.

9 MR. LEOPOLD: I owe you nothing.

10 MR. TEIN: I don't care. Don't interrupt
11 me.

12 Because Jack canceled his vacation plans
13 because of you.

14 MR. GOLDBERGER: That's all right, that's
15 all right.

16 MR. TEIN: And you're selfish. And this
17 deposition is over. Good-by Mr. Leopold.

18 MR. GOLDBERGER: You can go off the record.

19 - - -

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C E R T I F I C A T E

- - -

The State of Florida,)
County of Palm Beach.)

I hereby certify that I have read the
foregoing deposition by me given, and that the statements
contained herein are true and correct to the best of my
knowledge and belief, with the exception of any
corrections or notations made on the errata sheet, if one
was executed.

Dated this ____ day of _____, 2008.

[REDACTED]



1 DATE: February 25, 2008
2 TO: [REDACTED]
3 c/o Lana Belohlavek
4 Office of the State Attorney
5 401 N. Dixie Highway
6 West Palm Beach, Florida 33401
7 IN RE: STATE OF FLORIDA -V- JEFFREY EPSTEIN
8 CASE NO.: 2006 CF09454AXX

9 Please take notice that on Wednesday, the
10 20th of February, 2008, you gave your deposition in the
11 above-referred matter. At that time, you did not waive
12 signature. It is now necessary that you sign your
13 deposition.

14 Please call our office at the below-listed
15 number to schedule an appointment between the hours of
16 9:00 a.m. and 4:30 p.m., Monday through Friday.

17 If you do not read and sign the deposition
18 within a reasonable time, the original, which has already
19 been forwarded to the ordering attorney, may be filed
20 with the Clerk of the Court. If you wish to waive your
21 signature, sign your name in the blank at the bottom of
22 this letter and return it to us.

23 Very truly yours,

24 _____
25 Judith F. Consor, FPR
26 Consor & Associates Reporting and Transcription
27 1655 Palm Beach Lakes Boulevard, Suite 500
28 West Palm Beach, Florida 33401

29 I do hereby waive my signature:

30 _____
31 cc via transcript: JACK A. GOLDBERGER, ESQ.
32 LANNA BELOHLAVEK, ESQ.
33 MICHAEL R. TEIN, ESQ.
34 THEODORE J. LEOPOLD, ESQ.
35 file copy



1 ERRATA SHEET

2 IN RE: STATE-V-JEFFREY EPSTEIN

3 DEPOSITION OF: [REDACTED] TAKEN: February 20th,
2008

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

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21 Please forward the original signed errata sheet to this
22 office so that copies may be distributed to all parties.23 Under penalty of perjury, I declare that I have read my
24 deposition and that it is true and correct subject to any
25 changes in form or substance entered here.

DATE: _____ SIGNATURE OF DEPONENT: _____

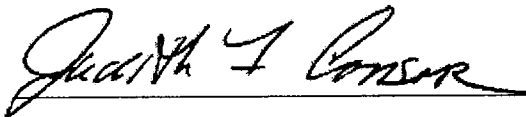
25



1 THE STATE OF FLORIDA,)
2 COUNTY OF PALM BEACH.)
3
4

5 I, the undersigned authority, certify that
6 [REDACTED] personally appeared before me on the 20th
7 of February, 2008 and was duly sworn.
8

9 WITNESS my hand and official seal this 25 day
10 of February, 2008.
11
12

13 
14

Judith F. Consor, FPR

15 Notary Public - State of Florida
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C E R T I F I C A T E

The State Of Florida,)
County Of Palm Beach.)

I, Judith F. Consor, Court Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did stenographically report the deposition of [REDACTED] that a review of the transcript was requested; and that the foregoing pages, numbered from 1 to 131, inclusive, are a true and correct transcription of my stenographic notes of said deposition.

I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out.

I further certify that I am not an attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

DATED this 25 day of February, 2008

Judith F. Consor, Court Reporter
Florida Professional Reporter



STATE COURT PLEADINGS

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY
FLORIDA

JANE DOE, by and through
JANE DOE'S MOTHER as parent and natural
guardian,

Plaintiffs,

vs.
JEFFREY EPSTEIN, HALEY ROBSON,
and SARAH KELLEN,

Defendants.

COMPLAINT

Plaintiffs, JANE DOE, by and through JANE DOE'S MOTHER as parent and natural guardian of JANE DOE, bring this Complaint against Defendants JEFFREY EPSTEIN, HALEY ROBSON, and SARAH KELLEN, and state as follows:

Parties, Jurisdiction and Venue

1. Jane Doe is a citizen and resident of the State of Florida. She is a minor under the age of 18 years.
2. Jane Doe's Mother brings this action as parent and natural guardian of Jane Doe.
3. This Complaint is brought under fictitious names to protect the identity of the Minor Plaintiff because this Complaint makes sensitive allegations of sexual assault and abuse upon a minor.
4. Defendant Jeffrey Epstein is a citizen and resident of the State of New York.
5. Defendant Haley Robson is a citizen and resident of Palm Beach County, Florida.
6. Defendant Sarah Kellen is a citizen and resident of the State of New York.

CASE NO. 30-2008 CA 006596 XXXX MB

2008 MAR -6 PM 4:37
SHAFU H. BOCK, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL

FILED
AB

7. This is an action for damages in excess of Fifteen Thousand Dollars (\$15,000) exclusive of interest and costs.

8. Venue is proper in this Court under section 47.011, Florida Statutes, because the causes of action brought herein accrued in Palm Beach County, Florida and one or more Defendants resides in Palm Beach County, Florida.

Factual Allegations

9. At all relevant times, Defendant Jeffrey Epstein was an adult male. Epstein is a financier and money manager with a secret clientele limited exclusively to billionaires. He is a man of tremendous wealth, power and influence. He maintains his principal home in New York and also owns residences in New Mexico, St. Thomas and Palm Beach, Florida. The allegations herein concern Epstein's conduct while at his lavish estate in Palm Beach.

10. Upon information and belief, Epstein has a sexual preference and obsession for minor girls. He engaged in a plan, scheme, and/or enterprise in which he gained access to primarily economically disadvantaged minor girls in his home, sexually assaulted these girls or coerced them to engage in prostitution, and then gave them money. In or about 2005, Jane Doe, then 14 years old, fell into Epstein's trap and became one of his victims.

11. Upon information and belief, Jeffrey Epstein carried out this scheme/enterprise and assaulted girls in Florida, New York and on his private island, known as Little St. James, in St. Thomas.

12. An integral player in Epstein's Florida scheme was Sarah Kellen, an assistant of Epstein's from New York, New York and Haley Robson, a Palm Beach Community College student from Loxahatchee, Florida. They recruited girls ostensibly to give a wealthy man a massage for monetary compensation in his Palm Beach mansion. Under Epstein's plan/enterprise, Ms. Robson was contacted shortly before or soon after Epstein was at his Palm Beach residence. Epstein, Kellen or someone on their behalf directed Ms. Robson to bring one or more underage girls to the residence.

Ms. Robson, upon information and belief, generally sought out economically disadvantaged underage girls from Loxahatchee and surrounding areas who would be enticed by the money being offered - generally \$200 to \$300 per "massage" session - and who were perceived as less likely to complain to authorities or have credibility if allegations of improper conduct were made. This was an important element of Epstein's plan/enterprise.

13. Epstein's plan, scheme, and/or enterprise reflected a particular pattern and method. Upon arrival at Epstein's mansion, Mr. Robson would introduce each victim to Sarah Kellen, Epstein's assistant, who gathered the girl's personal information, including her name and telephone number. Ms. Kellen would then bring the girl up a flight of stairs to a bedroom that contained a massage table in addition to other furnishings. There were photographs of nude women lining the stairway hall and in the bedroom. Ms. Kellen would then leave the girl alone in this room, whereupon Epstein would enter wearing only a towel. He would then remove his towel, lay down naked on the massage table, and direct the girl to remove her clothes. He then would perform one or more lewd, lascivious and sexual acts, including masturbation, touching the girl's vagina with a vibrator, or digitally penetrating the girl's vagina.

14. Consistent with the foregoing plan, scheme, and/or enterprise, Ms. Robson recruited Jane Doe to give Epstein a massage for monetary compensation. Ms. Robson brought Jane Doe to Epstein's mansion in Palm Beach. Jane was introduced to Sarah Kellen, who led her up the flight of stairs to the room with the massage table. Ms. Kellen set up the message table and laid out message oils and told Jane Doe that Epstein would be in shortly and then left the room. Jane Doe was alone in the room when Epstein arrived. Epstein told her to remove her clothes and left the room. When Epstein returned he was wearing only a towel. He removed his towel, and laid down on his stomach on the message table. Epstein again told Jane Doe remove her clothes. In shock, fear and trepidation, Jane Doe complied, removing her clothes except for her panties and bra. Shortly

after starting to rub Epstein's back, Epstein told Jane Doe to sit on his back. Jane Doe, out of fear and trepidation, complied. After a period of time Epstein got up from the table and went behind the door. For several minutes Jane Doe heard loud noises and moans and believes that Epstein was masturbating. Thereafter Epstein, naked, returned to the massage table and laid face up on the table. Epstein then told Jane Doe to continue with the massage and told her to sit on top of him. Out of fear and trepidation she complied. As Jane Doe rubbed Epstein's chest Epstein began to use a vibrator on Jane Doe's vagina. Thereafter Epstein began to digitally stimulate and attempt to penetrate Jane's vagina. At this same time Epstein was masturbating. Upon reaching orgasm Epstein got up from the massage table and told Jane Doe to write down her name and phone number and then left the room.

15. Jane Doe was then able to get dressed, leave the room and go back down the stairs and into the kitchen. Epstein, Robson and Kellen were waiting for Jane Doe. Epstein paid Jane Doe \$300. Ms. Robson was paid \$200 by Epstein for bringing Jane to him. Ms. Robson brought Jane Doe home.

16. As a result of this encounter with Epstein, the 14-year old Jane Doe experienced confusion, shame, humiliation, embarrassment and the assault sent her life into a downward spiral.

COUNT I

Sexual Assault against Defendant Epstein

17. Plaintiff Jane Doe by and through her Mother, as parent and natural guardian, repeats and realleges paragraphs 1 through 16 above.

18. Defendant Epstein tortiously assaulted Jane Doe sexually in or about 2005.

19. This sexual assault was in violation of Chapter 800 of the Florida Statutes, which recognizes as a crime the lewd and lascivious acts committed by Epstein upon Jane Doe.

20. As a direct and proximate result of Epstein's assault on Jane Doe, she has suffered and will continue to suffer severe and permanent traumatic injuries, including mental, psychological and emotional damages.

WHEREFORE, Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, demands judgment against Defendant Jeffrey Epstein for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

COUNT II

Civil Conspiracy against Defendants Epstein, Robson and Kellen

21. Plaintiff Jane Doe by and through her Mother, as parent and natural guardian, repeats and realleges paragraphs 1 through 16 above.

22. Defendants Epstein, Robson and Kellen conspired to subject Jane Doe to the sexual assault of Defendant Epstein.

23. Each of the Defendants committed an overt act in pursuance of this conspiracy: Defendant Robson used false pretenses to lure Jane Doe to the home of Defendant Epstein so that Epstein could sexually assault Jane Doe; Defendant Kellen delivered Jane Doe to Defendant Epstein's bedroom so that Epstein could sexually assault Jane Doe; and Defendant Epstein actually committed sexual assault against Jane Doe.

24. As a direct and proximate result of Defendants' civil conspiracy, Jane Doe has suffered and will continue to suffer severe and permanent traumatic injuries, including mental, psychological and emotional damages.

WHEREFORE, Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, demands judgment against Defendants Jeffrey Epstein, Haley Robson, and Sarah Kellen for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

COUNT III

Intentional Infliction of Emotional Distress against Defendant Epstein

25. Plaintiffs Jane Doe by and through her Mother, as parent and natural guardian, repeat and reallege paragraphs 1 through 16 above.

26. Epstein's conduct was intentional or reckless.

27. Epstein's conduct was outrageous, going beyond all bounds of decency.

28. Epstein's conduct caused severe emotional distress not only to Jane Doe. Epstein knew or had reason to know that his intentional and outrageous conduct would cause emotional trauma and damage to Jane Doe and her mother.

29. As a direct and proximate result of Epstein's intentional or reckless conduct, Jane Doe will continue to suffer severe mental anguish and pain.

WHEREFORE, Jane Doe, by and through her Mother, and Jane Doe's Mother, individually, demand judgment against Defendant Jeffrey Epstein for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

COUNT IV

**Civil Remedy for Violation of Florida Statute Section 772.103 against
Defendants Epstein, Robson and Kellen**

30. Plaintiffs Jane Doe by and through her Mother, as parent and natural guardian, repeat and reallege paragraphs 1 through 16 above.

31. Defendants participated in an enterprise, or conspired or endeavored to so participate, through a pattern of criminal activity in violation of Florida Statute section 772.103(3)-(4).

32. Defendants engaged in this pattern of criminal activity by engaging in at least two of the following incidents of criminal activity with the same or similar intents, results, accomplices, victims, and methods of commission within a 5 year period:

- a. Procuring for prostitution, or causing to be prostituted, any person who is under the age of 18 years in violation of Florida Statute section 796.03;
- b. Soliciting, inducing, enticing, or procuring another to commit prostitution, lewdness, or assignation in violation of Florida Statute section 796.07(2)(f), or aiding, abetting or participating in such acts in violation of Florida Statute section 796.07(2)(h);
- c. Knowingly recruiting, enticing, harboring, transporting, providing, or obtaining by any means a person, knowing that force, fraud, or coercion will be used to cause that person to engage in prostitution in violation of Florida Statute section 796.045; or
- d. Forcing, compelling, or coercing another to become a prostitute in violation of Florida Statute section 796.04.

33. Under Defendants' plan, scheme and enterprise, Defendant Epstein paid Defendant Robson to repeatedly find and bring him underage girls, who were delivered to Epstein by

Defendants Robson and Kellen, in order for Epstein to solicit, induce, coerce, entice, compel or force such girls to engage in acts of prostitution and/or lewdness.

34. Plaintiff Jane Doe was the victim of Defendants' plan, scheme and enterprise. Defendant Robson took Jane Doe to Epstein's home under the pretense that Jane Doe would be paid to give Epstein a massage. Defendant Kellen delivered Jane Doe to a room with a massage table and told that Epstein would be in shortly. Jane Doe was alone in the room when Epstein arrived. Epstein told her to remove her clothes and left the room. When Epstein returned he was wearing only a towel. He removed his towel, and laid down on his stomach on the massage table. Epstein again told Jane Doe remove her clothes. In shock, fear and trepidation, Jane Doe complied, removing her clothes except for her panties and bra. Shortly after starting to rub Epstein's back, Epstein told Jane Doe to sit on his back. Jane Doe, out of fear and trepidation, complied. After a period of time Epstein got up from the table and went behind the door. For several minutes Jane Doe heard loud noises and moans and believes that Epstein was masturbating. Thereafter Epstein, naked, returned to the massage table and laid face up on the table. Epstein then told Jane Doe to continue with the massage and told her to sit on top of him. Out of fear and trepidation she complied. As Jane rubbed Epstein's chest Epstein began to use a vibrator on Jane Doe's vagina. Thereafter Epstein began to digitally stimulate and attempt to penetrate Jane Doe's vagina. At this same time, with his other hand, Epstein was masturbating. Upon reaching orgasm Epstein got up from the massage table and told Jane Doe to write down her name and phone number and then left the room.

35. Jane Doe was then able to get dressed, leave the room and go back down the stairs and into the kitchen. Epstein, Robson and Kellen were waiting for Jane Doe. Epstein paid Jane Doe

\$300. Ms. Robson was paid \$200 by Epstein for bringing Jane to him. Ms. Robson brought Jane Doe home.

WHEREFORE, Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, demands judgment against Defendants Jeffrey Epstein, Haley Robson, and Sarah Kellen for compensatory damages, treble damages under Florida Statute section 772.104, costs and attorney's fees under Florida Statute section 772.104, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

JURY TRIAL DEMAND

Plaintiffs demand a jury trial in this action.

Dated: March 6, 2008

Respectfully submitted,

RICCI-LEOPOLD, P.A.
2925 PGA Blvd., Suite 200
Palm Beach Gardens, FL 33410
Phone: 561-684-6500
Fax: 561-697-2383

By: _____

THEODORE J. LEOPOLD
Florida Bar No. 705608

Civil Cover Sheet

Form 1.997 Civil Cover Sheet

The civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of the Court for the purpose of reporting judicial workload data pursuant to Florida Statute 25.075.

50 2008 CA 0065 96 XXXX MB

1. CASE STYLE

CIRCUIT COURT

JANE DOE, by and through JANE DOE'S MOTHER
As parent and natural guardian,

v.

JEFFREY EPSTEIN, HALEY ROBSON and
SARAH KELLEN,

SHARON A. BUCH, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL
2008 MAR -6 PM 4:37

FILED

AB

2. TYPE OF CASE:

Torts:

Professional Malpractice
Products Liability
Auto Negligence
☒ Other Negligence

Other Civil:

Contracts
Condominium
Real Property/Mortgage Foreclosure
Eminent Domain
Other

3. IS JURY TRIAL DEMANDED IN COMPLAINT?

YES
NO

DATED THIS 6 day of March, 2008.

RICCI-LEOPOLD, P.A.
2925 PGA Blvd.
Suite 200
Palm Beach Gardens, FL 33410
Phone: (561) 684-6500
Fax: (561) 697-2383

By: 

THEODORE J. LEOPOLD
Florida Bar No. 705608

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY
FLORIDA

CASE NO: 50 2008 CA 006596 XXXX
MB AB

JANE DOE, by and through JANE DOE'S
MOTHER, as parent and natural guardian,

Plaintiff,

vs.

JEFFREY EPSTEIN, HALEY ROBSON and
SARAH KELLEN,

Defendants.

RECEIVED
JUL 29 2008
CLERK OF COURT
PALM BEACH COUNTY
FLORIDA

SUMMONS

PERSONAL SERVICE ON A NATURAL PERSON

TO DEFENDANT:

JEFFREY EPSTEIN
457 Madison Avenue
4th Floor
New York, New York

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint/petition with the Clerk of this Court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

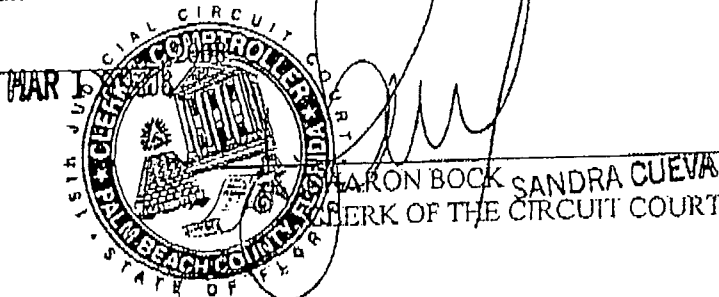
"In accordance with the Americans with Disabilities Act, persons in need of a special accommodation to participate in this proceeding shall, within a reasonable time prior to any proceeding, contact the Administrative Office of the Court, 205 North Dixie Highway, Room 5.2500, West Palm Beach, FL 33401, telephone (561)355-2431, 1-800-955-8771 (TDD), or 1-800-955-8770 (V), via Florida Relay Service".

THEODORE J. LEOPOLD, ESQUIRE
RICCI-LEOPOLD, P.A.
2925 PGA Boulevard
Suite 200
Palm Beach Gardens, FL 33410
(561) 684-6500

THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE: You are commanded to serve this Summons and a copy of the complaint/petition in this lawsuit on the above named defendant(s).

DATED ON



By:
Deputy Clerk

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 Dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

"De acuerdo con el Acto ó Decreto de los Americanos con Impedimentos, Inhabilitados, personas en necesidad del servicio special para participar en este procedimiento deberán, dentro de un tiempo razonable, antes de cualquier procedimiento, ponerse en contacto con la oficina Administrativa de la Corte, 205 North Dixie Highway, oficina 5.2500, West Palm Beach, FL 33401, Teléfono (561) 355-2431, 1-800-955-8771 (TDD) ó 1-800-955-8770 (V), Via Florida Relay Service".

IMPORTANT

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IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY
FLORIDA

CASE NO: 50 2008 CA 006596 XXXX
MB AB

JANE DOE, by and through JANE DOE'S
MOTHER, as parent and natural guardian,

Plaintiff,

vs.

JEFFREY EPSTEIN, HALEY ROBSON and
SARAH KELLEN,

Defendants.

SUMMONS

PERSONAL SERVICE ON A NATURAL PERSON

TO DEFENDANT:

HALEY ROBSON
12247 72ND COURT NORTH
ROYAL PALM BEACH, FL

IMPORTANT

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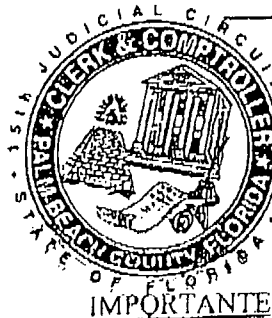
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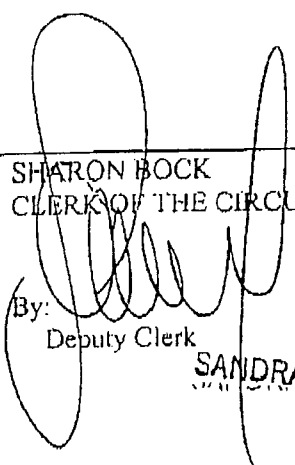
THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE: You are commanded to serve this Summons and a copy of the complaint/petition in this lawsuit on the above named defendant(s).

DATED ON MAR 18 2008, 2008.



SHARON BOCK
CLERK OF THE CIRCUIT COURT

By: 
Deputy Clerk

SANDRA CUEVA

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IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY
FLORIDA

CASE NO: 50 2008 CA 006596 XXXX
MB AB

JANE DOE, by and through JANE DOE'S
MOTHER, as parent and natural guardian,

Plaintiff,

vs.

JEFFREY EPSTEIN, HALEY ROBSON and
SARAH KELLEN,

Defendants.

SUMMONS

PERSONAL SERVICE ON A NATURAL PERSON

TO DEFENDANT:

SARAH KELLEN,
301 East 66th Street
Apt. 10N
New York, New York

IMPORTANT

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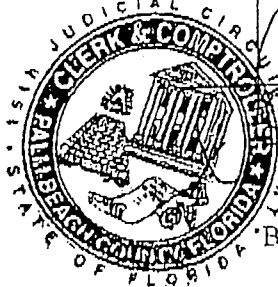
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THEODORE J. LEOPOLD, ESQUIRE
RJCCI-LEOPOLD, P.A.
2925 PGA Boulevard
Suite 200
Palm Beach Gardens, FL 33410
(561) 684-6500

THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE: You are commanded to serve this Summons and a copy of the complaint/petition in this lawsuit on the above named defendant(s).

DATED ON MAR 18 2008, 2008.



FLARON BOCK
CLERK OF THE CIRCUIT COURT

SANDRA CUEVA

By: Deputy Clerk

IMPORTANTE

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RETURN OF SERVICE

Circuit Court

State of Florida

County of Palm Beach

Case Number: 502008CA006596XXXXMBA8

Plaintiff:
 JANE DOE BY AND THROUGH JANE DOE'S MOTHER, AS PARENT
 AND NATURAL GUARDIAN

vs.

Defendant:
 JEFFREY EPSTEIN, HALEY ROBSON AND SARAH KELLEN

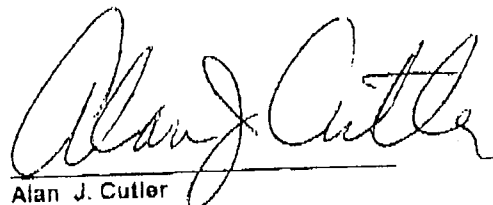
For:
 Ted Leopold, Esquire
 RICCI-LEOPOLD, P.A.
 2925 Pga Blvd. Suite 200
 Palm Beach Gardens, FL 33410

Received by C.W. SERVICES on the 19th day of March, 2008 at 9:20 am to be served on HALEY ROBSON. 12247
 72nd COURT NORTH, ROYAL PALM BEACH, FL

I, Alan J. Cutler, do hereby affirm that on the 21st day of March, 2008 at 8:34 pm, I:

SERVED BY RESIDENTIAL SUBSTITUTION by leaving a true copy of this Summons and Complaint with the date and time of service endorsed thereon by me. This address is the above named subject's usual place of abode. The court document was served to a person residing at this numerical who was verified to be 15 years of age or older and was identified as TOMMY ROBSON/FATHER and informing this subject of the contents thereof.

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server in good standing in the judicial circuit in which the process was served.



Alan J. Cutler
 Court Officer #843

C.W. SERVICES
 4908 Graseleaf Drive
 Palm Beach Gardens, FL 33418
 (561) 630-4866

Our Job Serial Number: 2008034295

34295

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY
FLORIDA

CASE NO: 50 2008 CA 006596 XXXX
MB AB

JANE DOE, by and through JANE DOE'S
MOTHER, as parent and natural guardian,

Plaintiff,

vs.

JEFFREY EPSTEIN, HALEY ROBSON and
SARAH KELLEN,

Defendants.

SUMMONS

PERSONAL SERVICE ON A NATURAL PERSON

TO DEFENDANT:

HALEY ROBSON
12247 72ND COURT NORTH
ROYAL PALM BEACH, FL

IMPORTANT

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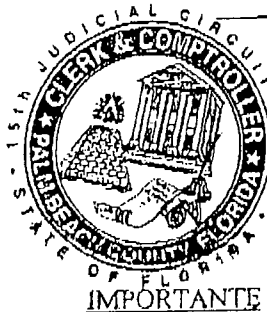
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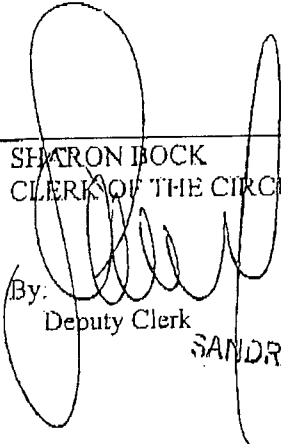
THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE: You are commanded to serve this Summons and a copy of the complaint/petition in this lawsuit on the above named defendant(s).

DATED ON MAR 18 2008, 2008.



SHARON BOCK
CLERK OF THE CIRCUIT COURT

By: 
Deputy Clerk

SANDRA CUEVA

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IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY FLORIDA

JANE DOE, by and through JANE
DOE'S MOTHER, as parent and natural
guardian

CASE NO. 50 2008 CA006596
XXXX MB

AB

Plaintiff,

vs.

JEFFREY EPSTEIN, HALEY
ROBSON, and SARAH KELLEN

Defendants.

FILED
08 APR 10 PM 4:12
CLERK
PALM BEACH COUNTY, FL
CIRCUIT CIVIL 4

MOTION TO QUASH SERVICE OF PROCESS

COMES NOW HALEY ROBSON, by and through her undersigned attorneys,
and files this Motion to Quash Service of Process, and as grounds therefore would
state as follows:

1. Florida Statute §48.031(1) allows service of original process
by delivering a copy of it to the person to be served or by leaving copies at his or her
usual place of abode with any person residing there who is fifteen years or older and
informing that person of their contents.

2. An agent for counsel for the Plaintiff purports to have served
HALEY ROBSON with a copy of the Complaint via residential substitution on March
21, 2008 at 8:34 p.m. (A true and correct copy of the Return of Service is attached

CASE NO. 50 2008 CA006596 XXXX MB

hereto as Exhibit A.) As the Court can see, the agent for the Plaintiff who served the Summons and Complaint purports to have served the same on Tommy Robson, who is identified as Haley Robson's father. Said service was purportedly made at 12247 72nd Court North, Royal Palm Beach, Florida, located in Palm Beach County.

3. On March 21, 2008, Haley Robson's usual place of abode was not 12247 72nd Court North, Royal Palm Beach, Florida, in Palm Beach County. Rather, Haley Robson's usual place of abode on March 21, 2008, was an entirely different location. Haley Robson did not authorize anyone, including Tommy Robson, to accept service of process on her behalf. Therefore, this service was not proper and was ineffective.

4. It is well recognized in Florida that a person's usual place of abode is defined as the place where the person is actually living at the time of service. See *Shurman v. Atlantic Mortgage and Investment Corp.*, 795 So. 2d 952 (Fla. 2001). In the *Shurman* opinion, the Supreme Court of Florida also confirmed that "statutes governing service of process are to be strictly construed and enforced." *Id.* at 954.

5. There are different schools of thought as to the most appropriate way to challenge service of process. There is also some confusion with regard to whether filing a motion other than a Motion to Quash Service of Process waives one's right

CASE NO. 50 2008 CA006596 XXXX MB

to move to quash service of process. Therefore, Haley Robson files this Motion to Quash Service of Process in lieu of any other type of motion or responsive pleading pursuant to the Fourth District Court of Appeal's opinion in Baraban v. Sussman, which holds that the "preferable manner of presenting a defense of insufficiency of service of process . . . is by a Motion to Quash such allegedly insufficient service of process rather than by a Motion to Dismiss the Complaint." Baraban v. Sussman, 439 So. 2d 1046, 1047 (Fla. 4th DCA 1983).

6. Haley Robson reserves the right to supplement this motion with evidence to support it.

WHEREFORE, Haley Robson respectfully moves this Honorable Court for the entry of an Order granting Haley Robson's Motion to Quash the Service of Process.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via regular mail to **Theodore J. Leopold, Esq.**, Ricci-Leopold, P.A., 2925 PGA Boulevard, Suite 200, P.O. Box 2946, Palm Beach Gardens, FL 33410, this 10th day of April, 2008.

CASE NO. 50 2008 CA006596 XXXX MB

McINTOSH, SAWRAN, PELTZ
& CARTAYA, P.A.
Centurion Tower
1601 Forum Place, Suite 1110
West Palm Beach, Florida 33401
Telephone: (561) 682-3202
Facsimile: (561) 682-3206

By: 

DOUGLAS M. McINTOSH
Florida Bar No. 325597
JASON A. McGRATH
Florida Bar No. 97349

RETURN OF SERVICE

State of Florida

County of Palm Beach

Circuit Court

Case Number: 502008CA008596XXXXMBAB

Plaintiff:**JANE DOE BY AND THROUGH JANE DOE'S MOTHER, AS PARENT
AND NATURAL GUARDIAN**

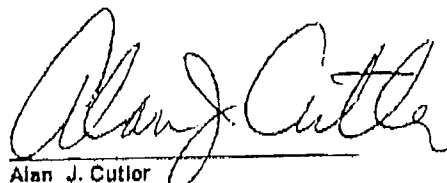
vs.

Defendant:**JEFFREY EPSTEIN, HALEY ROBSON AND SARAH KELLEN****For:**Ted Leopold, Esquire
RICCI-LEOPOLD, P.A.
2925 Pga Blvd. Suite 200
Palm Beach Gardens, FL 33410Received by C.W. SERVICES on the 19th day of March, 2008 at 9 20 am to be served on **HALEY ROBSON, 12247
72nd COURT NORTH, ROYAL PALM BEACH, FL.**

I, Alan J. Cutler, do hereby affirm that on the 21st day of March, 2008 at 8:34 pm, I:

SERVED BY RESIDENTIAL SUBSTITUTION by leaving a true copy of this Summons and Complaint with the date and time of service endorsed thereon by me. This address is the above named subject's usual place of abode. The court document was served to a person residing at this numerical who was verified to be 15 years of age or older and was identified as **TOMMY ROBSON/FATHER** and informing this subject of the contents thereof

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server in good standing in the judicial circuit in which the process was served.


 Alan J. Cutler
 Court Officer #843
C.W. SERVICES
4908 Grassleaf Drive
Palm Beach Gardens, FL 33418
(861) 630-4868

Our Job Serial Number: 2008034295

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RETURN OF SERVICE

State of Florida

County of Palm Beach

Circuit Court

Case Number: 502008CA006596XXXXMBAB

Plaintiff:

JANE DOE BY AND THROUGH JANE DOE'S MOTHER, AS PARENT
AND NATURAL GUARDIAN

vs.

Defendant:

JEFFREY EPSTEIN, HALEY ROBSON AND SARAH KELLEN

For:

Ted Leopold, Esquire
RICCI-LEOPOLD, P.A.
2925 Pga Blvd Suite 200
Palm Beach Gardens, FL 33410

2008 MAY 20 AM 10:05
CLERK OF COURT
PALM BEACH COUNTY
CIRCUIT CIVIL

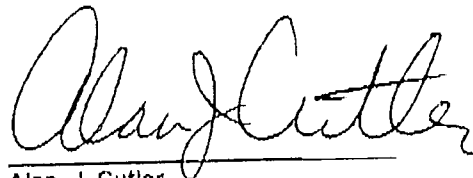
Received by C W SERVICES on the 14th day of May, 2008 at 3:59 pm to be served on JEFFREY EPSTEIN. 368
EL BRILLO WAY. PALM BEACH FL. 33480

I, Alan J. Cutler, do hereby affirm that on the 16th day of May, 2008 at 9:15 am, I:

SERVED BY RESIDENTIAL SUBSTITUTION by leaving a true copy of this Summons and Complaint with the date and time of service endorsed thereon by me. This address is the above named subject's usual place of abode. The court document was served to a person residing at this numerical who was verified to be 15 years of age or older and was identified as JANUSZ BANASIAK (LIVE IN HOUSE MANAGER) and informing this subject of the contents thereof.

Military Status: Based upon inquiry of party served, defendant is not in the military service of the United States.

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server in good standing in the judicial circuit in which the process was served



Alan J. Cutler
Court Officer #843

C.W. SERVICES
4908 Grassleaf Drive
Palm Beach Gardens, FL 33418
(561) 630-4866

Our Job Serial Number: 2008035775

34296
97

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY
FLORIDA

CASE NO: 50 2008 CA 006596 XXXX
MB AB

JANE DOE, by and through JANE DOE'S
MOTHER, as parent and natural guardian,

Plaintiff,

vs.

JEFFREY EPSTEIN, HALEY ROBSON and
SARAH KELLEN,

Defendants.

SUMMONS

PERSONAL SERVICE ON A NATURAL PERSON

TO DEFENDANT:

JEFFREY EPSTEIN
457 Madison Avenue
4th Floor
New York, New York 10022

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint/petition with the Clerk of this Court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

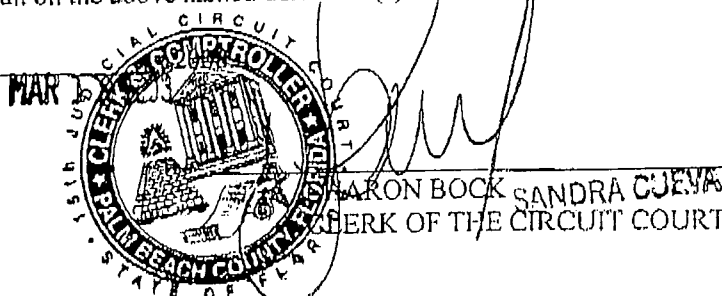
"In accordance with the Americans with Disabilities Act, persons in need of a special accommodation to participate in this proceeding shall, within a reasonable time prior to any proceeding, contact the Administrative Office of the Court, 205 North Dixie Highway, Room 5.2500, West Palm Beach, FL 33401, telephone (561)355-2431, 1-800-955-8771 (TDD), or 1-800-955-8770 (V), via Florida Relay Service".

THEODORE J. LEOPOLD, ESQUIRE
 RICCI~LEOPOLD, P.A.
 2925 PGA Boulevard
 Suite 200
 Palm Beach Gardens, FL 33410
 (561) 684-6500

THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE: You are commanded to serve this Summons and a copy of the complaint/petition in this lawsuit on the above named defendant(s).

DATED ON



By:

Deputy Clerk

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 Dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.