



Page 75

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?



Page 76

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.



Page 77

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; it's 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 Q. 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.



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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 ?

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

13 THE WITNESS: I'm positive.

14 BY MR. TEIN:

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.

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.



Page 93

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 0. 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.



Page 96

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?



Page 97

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 [REDACTED]



Page 98

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?



The logo for Censor & Associates, Inc. It features a stylized sun icon on the left, composed of radiating lines. To the right of the sun, the word "Censor" is written in a large, serif font, with a ampersand symbol "&" positioned between "Censor" and "Associates". Below "Associates", the words "Reporting and Transcription, Inc." are written in a smaller, sans-serif font.

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4 Everyone has their clothing on.

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

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



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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,  
[REDACTED]

3  
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.

14 .....CERTIFIED 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.

2 .....CERTIFIED 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        dor'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.



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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.



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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



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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. BELOHЛАVEK: 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



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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  
8 If not, then I want to pull each one out and put  
9 exhibit labels on them, which we should do before  
we leave.

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 with 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



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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



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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



Page 128

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



Page 129

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



Page 130

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,



Page 131

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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Page 132

1

C E R T I F I C A T E

2

- - -

3

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

6

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

13

14

15 Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2008.

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[Redacted signature]

Ph. 561.682.0905 - Fax. 561.682.1771  
1655 Palm Beach Lakes Blvd., Suite 500 - West Palm Beach, FL 33401



Page 133

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

15           Please call our office at the below-listed  
 16           number to schedule an appointment between the hours of  
 17           9:00 a.m. and 4:30 p.m., Monday through Friday.

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

24           Very truly yours,

25           \_\_\_\_\_  
 1           Judith F. Consor, FPR  
 2           Consor & Associates Reporting and Transcription  
 3           1655 Palm Beach Lakes Boulevard, Suite 500  
 4           West Palm Beach, Florida 33401

5           I do hereby waive my signature:

6           \_\_\_\_\_  
 7           [REDACTED]

8           cc via transcript:    JACK A. GOLDBERGER, ESQ.  
 9                                LANNA BELOHLAVEK, ESQ.  
 10                              MICHAEL R. TEIN, ESQ.  
 11                              THEODORE J. LEOPOLD, ESQ.  
 12  
 13                              file copy

14  
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26           Ph. 561.682.0905 - Fax. 561.682.1771  
 27           1655 Palm Beach Lakes Blvd., Suite 500 - West Palm Beach, FL 33401



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1

## ERRATA SHEET

2

IN RE: STATE-V-JEFFREY EPSTEIN

3

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

4

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

PAGE # LINE # CHANGE REASON

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20

Please forward the original signed errata sheet to this office so that copies may be distributed to all parties.

22

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.

24

DATE: \_\_\_\_\_ SIGNATURE OF DEPONENT: \_\_\_\_\_

25

Ph. 561.682.0905 - Fax. 561.682.1771  
1655 Palm Beach Lakes Blvd., Suite 500 - West Palm Beach, FL 33401



Page 135

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

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Judith F. Consor, FPR

15

Notary Public - State of Florida

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Ph. 561.682.0905 - Fax. 561.682.1771  
1655 Palm Beach Lakes Blvd., Suite 500 - West Palm Beach, FL 33401



Page 136

1

## C E R T I F I C A T E

2

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

5

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

14

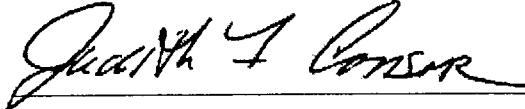
15                  I further certify that said deposition was  
 16                  taken at the time and place hereinabove set forth and  
 17                  that the taking of said deposition was commenced and  
 18                  completed as hereinabove set out.

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

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

28

29                  DATED this 25 day of February, 2008

30                  

31                  Judith F. Consor, Court Reporter  
 32                  Florida Professional Reporter



33

34

35

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38

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40

41

42                  Ph. 561.682.0905 - Fax. 561.682.1771  
 43                  1655 Palm Beach Lakes Blvd., Suite 500 - West Palm Beach, FL 33401

# **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.

CASE NO. 082008 CA 006596 XXXX MB

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

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 message table and laid face up on the table. Epstein then told Jane Doe to continue with the message 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 message 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 message 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 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 message table and laid face up on the table. Epstein then told Jane Doe to continue with the message 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 message 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: 561-684-6590  
Fax: 561-697-2483

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 006596 XXXX MB

## 1. CASE STYLE

CIRCUIT COURT

SHARON R. GUECH, CLERK  
PALM BEACH COUNTY  
CIRCUIT CIVIL

2008 MAR - 6 PM 4:37

AB  
JED

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

v.

JEFFREY EPSTEIN, HALEY ROBSON and  
SARAH KELLEN,

## 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

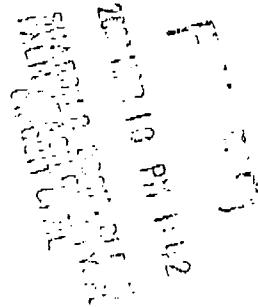
JANE DOE, by and through JANE DOE'S  
MOTHER, as parent and natural guardian,

Plaintiff,

vs.

JEFFREY EPSTEIN, HALEY ROBSON and  
SARAH KELLEN,

Defendants.



SUMMONS

PERSONAL SERVICE ON A NATURAL PERSON

TO DEFENDANT:

JEFFREY EPSTEIN  
457 Madison Avenue  
4<sup>th</sup> Floor  
New York, New York

IMPORTANT

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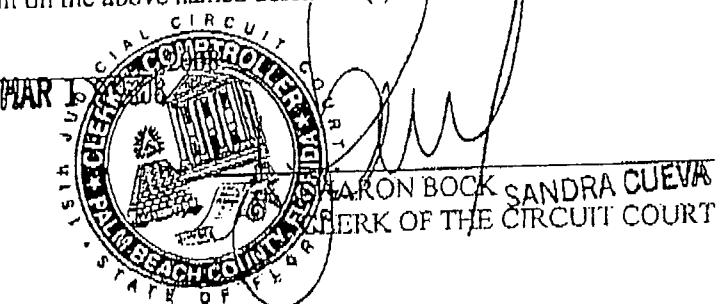
"In accordance with the Americans with Disabilities Act, persons in need of a special accommodation to participate in this proceeding shall, within a reasonable time prior to any proceeding, contact the Administrative Office of the Court, 205 North Dixie Highway, Room 5.2500, West Palm Beach, FL 33401, 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

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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 72<sup>ND</sup> COURT NORTH  
ROYAL PALM BEACH, FL

IMPORTANT

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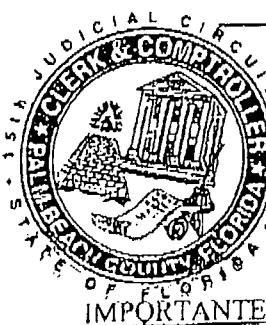
THEODORE J. LEOPOLD, ESQUIRE  
RICCI-LEOPOLD, P.A.  
2925 PGA Boulevard  
Suite 200  
Palm Beach Gardens, FL 33410  
(561) 684-6500

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).

MAR 18 2008

DATED ON \_\_\_\_\_, 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 66<sup>th</sup> Street  
Apt. 10N  
New York, New York

IMPORTANT

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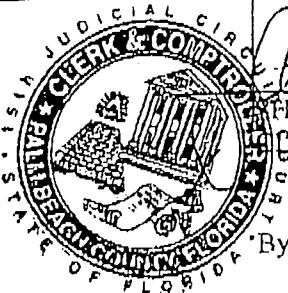
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THEODORE J. LEOPOLD, ESQUIRE  
RJCCI~LEOPOLD, P.A.  
2925 PGA Boulevard  
Suite 200  
Palm Beach Gardens, FL 33410  
(561) 684-6500

THE STATE OF FLORIDA

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DATED ON MAR 18 2008, 2008.



By: Sandra Cueva  
Deputy Clerk

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RETURN OF SERVICE

Circuit Court

State of Florida

County of Palm Beach

Case Number: 502008CA006696XXXXMBAB

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~LEOFOLD, P.A.  
2925 Pga Blvd. Suite 200  
Palm Beach Gardens, FL 33410

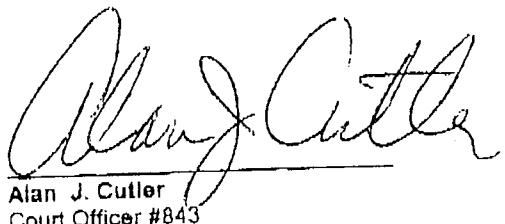
Received by C W SERVICES on the 19th day of March, 2008 at 9:20 am to be served on HALEY ROBSON, 12247

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 72<sup>ND</sup> COURT NORTH  
ROYAL PALM BEACH, FL

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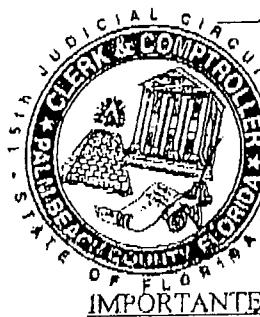
THEODORE J. LEOPOLD, ESQUIRE  
RICCI-LEOPOLD, P.A.  
2925 PGA Boulevard  
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Palm Beach Gardens, FL 33410  
(561) 684-6500

THE STATE OF FLORIDA

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MAR 18 2008

DATED ON \_\_\_\_\_, 2008.



SHARON BOCK  
CLERK OF THE CIRCUIT COURT

By:  
Deputy Clerk

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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.

03 APR 10 PM 4:12

FILED

PALM BEACH COUNTY, FL  
CLERK  
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. 4<sup>th</sup> 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: 502008CA008586XXXXMBA#

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

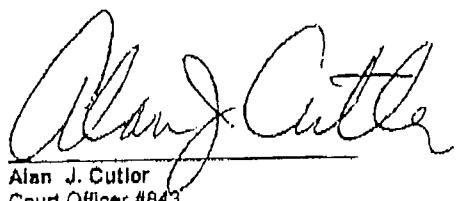
Received by C.W. SERVICES on the 19th day of March, 2008 at 9:20 am to be served on HALEY ROBSON, 12247  
72nd COURT NORTH, ROYAL PALM BEACH, FL.

38 MAR 25 2008  
CIRCUIT COURT  
Palm Beach County, FL  
30

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 18 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.

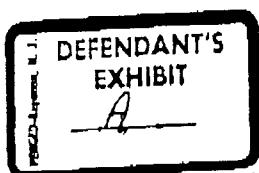


Alan J. Cutler  
Court Officer #843

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: 502008CA006506XXXXMBAB

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:  
 Tad Leopold, Esquire  
 RICCI~LEOPOLD, P.A.  
 2925 Pga Blvd Suite 200  
 Palm Beach Gardens, FL 33410

2008 MAY 20 AM 10:05  
 CHIEF JUDGE  
 PALM BEACH CIRCUIT COURT  
 CIRCUIT CIVIL

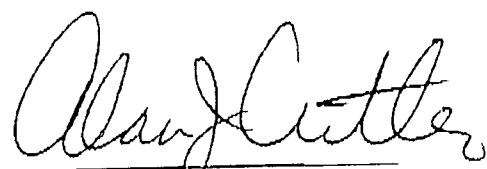
Received by C W SERVICES on the 14th day of May, 2008 at 3:59 pm to be served on **JEFFREY EPSTEIN, 368  
 EL BRILLO WAY, PALM BEACH FL 33480**

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 **JANJSZ 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) 630-4886

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  
4<sup>th</sup> 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.

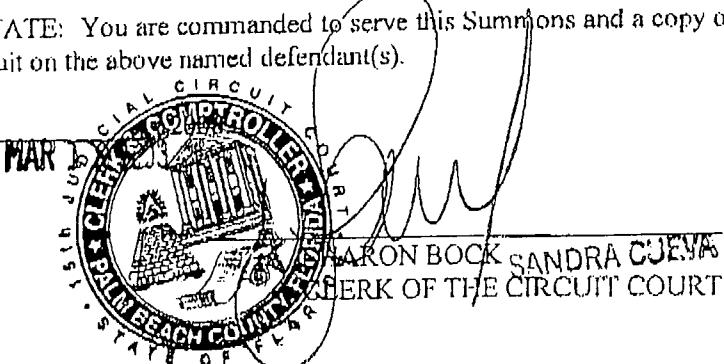
"In accordance with the Americans with Disabilities Act, persons in need of a special accommodation to participate in this proceeding shall, within a reasonable time prior to any proceeding, contact the Administrative Office of the Court, 205 North Dixie Highway, Room 5.2500, West Palm Beach, FL 33401, 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.