

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

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Related cases:

08-80232, 08-08380, 08-80381, 08-80994,  
08-80993, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092

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**THIRD PARTY WITNESS, IGOR ZINOVIEV'S,**  
**MOTION FOR PROTECTIVE ORDER AND**  
**INCORPORATED MEMORANDUM OF LAW**

Third Party Witness, Igor Zinoview's, ("Mr. Zinoview") by and through his undersigned attorney, moves this Court pursuant to Fed. R. Civ. P. 26(c) for a protective order regarding his deposition and as grounds therefore would state:

1. As reflected on the affidavit of Igor Zinoview, attached as **Exhibit A**, he works for Defendant, Jeffrey Epstein ("Mr. Epstein") as a driver and bodyguard. He did not know Mr. Epstein before November of 2005. He first became employed by Mr. Epstein in November of 2005.
2. Additionally, Mr. Zinoview would testify as set forth on his affidavit, that at no time has he discussed with Mr. Epstein any issues involving Mr. Epstein's criminal case nor any of the cases or issues involved with civil plaintiffs.

3. In many of the depositions, counsel for L.M. and E.W., has asked them as witnesses to assume certain facts about which they have no knowledge, and he then asks their opinions about certain facts. See **Exhibit B** -Epstein's Motion for Protective Order to Prohibit Inappropriate Deposition Questions.

4. There is no information which Mr. Zinoview has relating to the facts and circumstances surrounding any of the pending civil cases, in that none of their allegations directed to Mr. Epstein extend beyond September of 2005. Therefore whatever information Mr. Zinoview may have, postdates that time.

5. Regarding the scope of discovery, Judge Linnea Johnson noted in her October 28, 2009 Omnibus Order (DE #377), “[w]hile the scope of discovery is broad, it is not without limits. Washington v. Brown & Williamson Tobacco, 959 F.2d 1566, 1570 (11th Cir. 1992). ... Courts have long held that ‘[w]hile the standard of relevancy [in discovery] is a liberal one, it is not so liberal as to allow a party to roam in the shadow zones of relevancy and to explore matter (sic) which does not presently appear germane on the theory that it might conceivably become so.’ Food Lion, Inc. v. United Food & Commercial Workers Intern. Union, 103 F.3d 1007, 1012-13 (C.A. D.C. 1997) (string cite omitted).”

6. Rule 26(c), Federal Rules of Civil Procedure, provides that, “[a] party or any person from whom discovery is sought may move for a protective order in the court where the action is pending.... The court may, for good cause, issue an order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense, including one or more of the following: (A) forbidding the disclosure or discovery;”.

7. As set forth in his affidavit, Mr. Zinoview cannot possibly have any knowledge or information that is presently germane to this action. Accordingly, the Court should enter a protective order prohibiting his deposition.

WHEREFORE, third-party witness moves this court for a protective order pursuant to Rule 26(c), Federal Rules of Civil Procedure, that his deposition not take place or the questioning be limited.

By: \_\_\_\_\_  
JACK ALAN GOLDBERGER ESQ.  
Florida Bar No. 262013  
[jagesq@bellsouth.net](mailto:jagesq@bellsouth.net)

**Rule 7.1 Certification**

I hereby certify that counsel for the movant has conferred or attempted to confer with opposing counsel in a good faith effort to resolve the discovery issues prior to the filing of this motion for protective order but has been unable to do so.

**Certificate of Service**

I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the following Service List in the manner specified by CM/ECF on this \_\_\_\_ day of November, 2009

Respectfully submitted,

By: \_\_\_\_\_  
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**Certificate of Service**  
**Jane Doe No. 2 v. Jeffrey Epstein**  
**Case No. 08-CV-80119-MARRA/JOHNSON**

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*Counsel for Defendant Jeffrey Epstein*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80119-MARRA-JOHNSON

JANE DOE NO. 2,

Plaintiff,

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JEFFREY EPSTEIN,

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Related Cases:

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09-80581, 09-80656, 09-80802, 09-81092.

AFFIDAVIT OF IGOR ZINOVIEV

STATE OF FLORIDA ) SS  
COUNTY OF PALM BEACH )

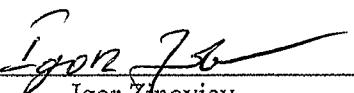
BEFORE ME, the undersigned authority, personally appeared Igor Zinoviev having personal knowledge and being duly sworn, deposes and says:

1. My name is Igor Zinoviev.
2. I began working for Mr. Epstein in November of 2005.
3. I did not know him until I began working for him.
4. I have never discussed nor has he ever attempted to discuss with me any facts or information relating to any legal matters in which he is involved.
5. I work for Mr. Epstein as his driver, bodyguard and trainer.

EXHIBIT A

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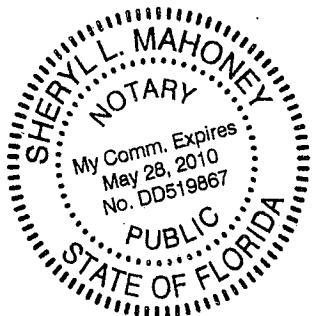
FURTHER THE AFFIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
Igor Zinoviev

STATE OF FLORIDA  
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Igor Zinoviev known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above named person: Igor Zinoviev, and that an oath was/was not taken.

WITNESS my hand and official seal in the County and State last aforesaid this day of Nov. 9, 2009.



  
\_\_\_\_\_  
PRINT NAME: Sherryl L. Mahoney (SEAL)  
NOTARY PUBLIC/STATE OF FLORIDA  
COMMISSION NO.:  
MY COMMISSION EXPIRES:

IN THE COURT OF THE FIFTEENTH  
JUDICIAL CIRCUIT, IN AND FOR PALM  
BEACH COUNTY, FLORIDA

CASE NO. 502008CA028051XXXXMB AB

L.M.,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

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**EPSTEIN'S MOTION FOR PROTECTIVE ORDER TO  
PROHIBIT INAPPROPRIATE DEPOSITION QUESTIONS**

Defendant, JEFFREY EPSTEIN ("Epstein"), pursuant to Rule 1.280(c), Florida Rules of Civil Procedure, moves for a protective order to prohibit argumentative, harassing and inappropriate questions in depositions, and states:

1. At numerous depositions, Plaintiff's counsel has repeatedly asked argumentative and harassing questions that are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.
2. In particular, Plaintiff's counsel has asked questions that improperly sought to illicit lay opinions from fact witnesses, asked questions regarding witnesses' feelings towards Mr. Epstein and their beliefs regarding media reports of this case, asked whether they would leave their children with Mr. Epstein and asked whether they would go back to work for Mr. Epstein assuming the media reports were accurate, among other things. These questions and the responses thereto will never be admissible. They are argumentative, irrelevant and seek speculative answers and inadmissible lay opinions.

**EXHIBIT B**

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3. For example, in the deposition of Larry Visoski, one of Mr. Epstein's pilots, Plaintiff's counsel asked the following questions seeking to obtain Mr. Visoski's beliefs and opinions on Plaintiff's allegations:

Q. All right. When you read in the newspapers the allegations that Mr. Epstein was involved with numerous underage girls for sexual reasons, were you surprised?

A. I didn't believe it.

Q. Do you believe it today?

A. I don't believe it.

Q. You don't believe that Jeffrey Epstein was involved with underage girls in a sexual way?

MR. CRITTON: Form.

THE WITNESS: You're asking for my opinion, and I don't think my opinion is relevant in that matter.

BY MR. EDWARDS:

Q. I think it's relevant. Can you just tell me whether today you believe that Jeffrey Epstein has engaged in sex with underage girls?

MR. CRITTON: Form; speculation, irrelevant, always.

THE WITNESS: It's irrelevant.

BY MR. EDWARDS:

Q. I need an answer.

A. I don't believe he had sex with underage women.

Q. Or engaged in any sexual acts with underage women?

MR. CRITTON: Form.

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Epstein's Motion for Protective Order to Prohibit Inappropriate Deposition Questions

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THE WITNESS: No.

BY MR. EDWARDS:

Q. You think that this is just a story that a bunch of underage women have made up?

A. Speculation.

\*\*\*\*\*

Q. Then we'll handle the question this way: If you were to believe based on information and evidence that Mr. Epstein engaged in sex or some form of sex acts with people of the age range of 12, 13, 14, 15 years old, would you continue your employment with Mr. Epstein?

MR. CRITTON: Form; speculation.

THE WITNESS: I would certainly be speculating and I have to discuss it with my wife long and hard. I don't think I could give you a correct and honest answer at this time.

See Excerpts of Deposition of Larry Visoski at 66-67; 181-82 (attached as composite **Exhibit A**). Other examples of similar improper questions are included in Exhibit A.

4. Not only do these questions seek improper lay opinions, Plaintiff's counsel asked Mr. Visoski his belief as to the truth of hearsay newspaper articles. The foregoing questions are obviously irrelevant, argumentative and not reasonably calculated to lead to the discovery of admissible evidence.

5. Moreover, whether Mr. Visoski would continue working for Mr. Epstein if Plaintiff's allegations are true has absolutely no relevance to any claim or defense in this case. The questions are simply improper and meant to harass and embarrass the

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witness.

6. Mr. Visoski was questioned for over four hours and much of the time was wasted on irrelevant and harassing questions.

7. Plaintiff's counsel asked similar questions at the deposition of Larry Eugene Morrison, another one of Mr. Epstein's pilots:

Q. Certainly you've read certain newspaper articles about the allegations, police reports, otherwise, the allegations that occurred or have been alleged to have occurred at his Palm Beach mansion, correct?

A. Uh-huh.

Q. Correct?

A. Correct.

Q. Given the nature of those allegations, would you leave your daughter of 17, 16, 15 years old with Mr. Epstein alone?

MR. PIKE: Form. Move to strike.

A. Yes.

\* \* \* \*

Q. And despite pleading guilty to procuring underage girls for the purposes of sex, you still feel comfortable leaving a 13, 14, 15-year-old girl around him?

MR. PIKE: Form. Move to strike.

A. Yes. I mean, with my daughter, yes. I don't know how he behaves around anybody else. I just know that the respect that he showed me, I feel safe with my daughter.

Q. And have you read in detail the reports as to what happened at his house with the girls?

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A. Only --

MR. PIKE: Form.

A. -- what's been in the newspapers and published.

Q. If you read and hear testimony given - well, I can tell you now - testimony has been given in this case that what happens is: A 13 or 14 year old is led upstairs by herself, told to get naked, he lays down on his back, there is a brief massage before he turns over, exposes himself erect, masturbates while he tells this 13 or 14 year old to pinch his nipples as hard as she can while he inserts his fingers into their vagina and ejaculates all over them before saying, "Take your money and leave."

MR. PIKE: Form. Move to strike.

BY MR. EDWARDS:

Q. Okay? Then, "You can continue to come back for \$200 every time or every girl you bring me within your age group and I get to do this again, I pay you \$200 per person." If that is the testimony --

MR. PIKE: Form.

Q. -- that what happens behind closed doors with him, do you still feel comfortable leaving a 13 or 14 year old in a room with Jeffrey Epstein?

MR. PIKE: Form.

A. If that, in fact, is what actually happened, no.

\* \* \* \*

Q. [Would you] go back - considering what you've read and what you may or may not believe - would you go back to working for Jeffrey Epstein?

MR. PIKE: Form.

A. I can't say. I still work for him on a maintenance - to

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maintain the airplanes and stuff like that, so.

See Excerpts of Deposition of Larry Eugene Morrison at 135-36; 175-76; 184  
(attached as composite **Exhibit B**).

8. Again, whether Mr. Morrison would work for Mr. Epstein "considering what [he has] read and what [he] may or may not believe" (i.e. considering hearsay media accounts and inadmissible lay opinion) has no bearing on the instant case.

9. In addition, questions regarding whether Mr. Morrison would leave his children alone with Mr. Epstein could have only been meant to harass and embarrass Mr. Morrison. Nevertheless, Mr. Morrison testified that he would leave his children with Mr. Epstein. As Plaintiff's counsel was obviously not happy with the answer to this question, he proceeded to press Mr. Morrison with inflammatory statements until he got the answer he wanted.

10. Plaintiff's counsel has also asked the same improper line of questions in other witnesses' depositions.

11. The above-cited questions exceed the bounds of permissible discovery; they have absolutely no relevance to this case. Accordingly, the Court should enter a protective order prohibiting such questions and should sanction Plaintiff's counsel if such inappropriate questions are asked at future depositions.

12. Regarding the scope of discovery, Judge Linnea Johnson noted in her October 28, 2009 Omnibus Order,<sup>1</sup> "[w]hile the scope of discovery is broad, it is not

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<sup>1</sup> The Omnibus Order (DE #377) was entered in the federal companion case Jane Doe No. 2 v. Epstein, Case No. 08-CIV-80119 MARRA/JOHNSON in the U.S. District Court, Southern District of Florida.

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Page 7 of 9

without limits. Washington v. Brown & Williamson Tobacco, 959 F.2d 1566, 1570 (11th Cir. 1992). ... Courts have long held that '[w]hile the standard of relevancy [in discovery] is a liberal one, it is not so liberal as to allow a party to roam in the shadow zones of relevancy and to explore matter (sic) which does not presently appear germane on the theory that it might conceivably become so.' Food Lion, Inc. v. United Food & Commercial Workers Intern. Union, 103 F.3d 1007, 1012-13 (C.A. D.C. 1997) (string cite omitted)." See also Capco Properties, LLC v. Monterra Gardens of Pinecrest Condo., 982 So. 2d 1211, (Fla. 3d DCA 2008) (holding that discovery in civil cases must be relevant to the subject matter of the case and must be admissible or reasonably calculated to lead to admissible evidence); Morton Plant Hospital Ass'n, Inc. v. Shahbas, 960 So. 2d 820, 824 (Fla. 2d DCA 2007) (holding that "discovery should be denied when it has been established that the information requested is neither relevant to any pending claim or defense nor will it lead to the discovery of admissible evidence," citing Tanchel v. Shoemaker, 928 So. 2d 440, 442 (Fla. 5th DCA 2006)).

13. As illustrated above, the questions are simply not germane to any pending claim or defense nor will they lead to the discovery of admissible evidence. Whether Mr. Visoski believes or disbelieves the media accounts of this case, or whether Mr. Morrison would leave his children with Mr. Epstein is not relevant and cannot conceivably lead to the discovery of admissible evidence.

14. The Court should curtail these inappropriate lines of questions and enter a protective order prohibiting them.

15. Rule 1.280(c), Florida Rules of Civil Procedure, provides the Court with

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the power to "make any order to protect a party or person from annoyance, embarrassment, oppression or undue burden or expense that justice requires including ... (4) that certain matter not be inquired into, or that the scope of the discovery be limited to certain matters."

16. Accordingly, Epstein requests the Court enter a protective order prohibiting Plaintiff's counsel from asking witnesses' questions regarding opinions and beliefs regarding media articles and the allegations in this case and whether they would leave their children with Epstein or questions of a similar nature, and limiting the scope to the witnesses personal knowledge regarding matters relevant to the claims and defenses in this case. See Shahbas, 960 So. 2d at 824.

WHEREFORE, Defendant, JEFFREY EPSTEIN, respectfully requests the Court enter a protective order prohibiting Plaintiff's counsel from asking witnesses' questions regarding opinions and beliefs regarding media articles and the allegations in this case and whether they would leave their children with Epstein or questions of a similar nature, and limiting the scope to the witnesses personal knowledge regarding matters relevant to the claims and defenses in this case and grant any additional relief the Court deems just and proper.

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was sent by fax and U.S. Mail to the following addressees on this 3rd day of November, 2009:

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Epstein's Motion for Protective Order to Prohibit Inappropriate Deposition Questions

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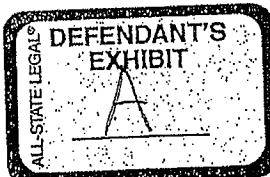
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*for*  
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Michael J. Pike  
Florida Bar #617296  
*(Counsel for Defendant Jeffrey Epstein)*

Larry Visoski

October 15, 2009

<p>IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA CASE NO. 502008CA028051XXXXMB AD</p> <p>L.M., Plaintiff, -vs- JEFFREY EPSTEIN, Defendant.</p> <p>DEPOSITION OF LARRY VISOSKI</p> <p>Thursday, October 15, 2009 10:18 - 3:37 p.m.</p> <p>515 N. Flagler Drive Suite P200 West Palm Beach, Florida 33401</p> <p>Reported By: Wendy Beath Anderson, RPR, CRR, FPR Notary Public, State of Florida Esquire Deposition Services West Palm Beach Office Job #127542</p>	<p>3</p> <p>1     ... 2     INDEX 3     ... 4 5     WITNESS:     DIRECT CROSS REDIRECT RECROSS 6 7     LARRY VISOSKI 8 9     BY MR. EDWARDS: 6 10    BY MR. CRITTON: 214 11    BY MR. EDWARDS: 220 12    BY MR. CRITTON: 221</p> <p>13    EXHIBITS 14    ... 15 16    NUMBER     DESCRIPTION     PAGE 17    PLAINTIFF'S EX. 1     FLIGHT LOG BOOK       (MARKED IN PREVIOUS DEPO)     119 18 19    PLAINTIFF'S EX. 2     MESSAGE PAD     119 20    PLAINTIFF'S EX. 3     MESSAGE PAD     119 21    PLAINTIFF'S EX. 4     COMPLAINT     139 22    PLAINTIFF'S EX. 5     INMATE VISITOR LOG     161 23 24 25</p>
<p>2</p> <p>1     APPEARANCES: 2     On behalf of the Plaintiff: 3     BRADLEY J. EDWARDS, ESQUIRE 4     ROTHSTEIN, ROSENFELDT, ADLER 5     401 East Las Olas Boulevard 6     Suite 1650 7     Fort Lauderdale, Florida 33394 8 9     On behalf of the Defendant: 10    ROBERT D. CRITTON, JR., ESQUIRE 11    BURMAN, CRITTON &amp; LUTTIER 12    303 Banyan Boulevard, Suite 400 13    West Palm Beach, Florida 33401 14 15    ALSO PRESENT: 16    CARA L. HOLMES, ESQUIRE 17    1220 N.W. 157th Avenue 18    Pembroke Pines, Florida 33028 19    ADAM D. HOROWITZ, ESQUIRE 20    MERMELSTEIN &amp; HOROWITZ, P.A. 21    18205 Biscayne Boulevard, Suite 2218 22    Miami, Florida 33160 23 24 25</p> <p>1     APPEARANCES: 2     On behalf of the Plaintiff: 3     BRADLEY J. EDWARDS, ESQUIRE 4     ROTHSTEIN, ROSENFELDT, ADLER 5     401 East Las Olas Boulevard 6     Suite 1650 7     Fort Lauderdale, Florida 33394 8 9     On behalf of the Defendant: 10    ROBERT D. CRITTON, JR., ESQUIRE 11    BURMAN, CRITTON &amp; LUTTIER 12    303 Banyan Boulevard, Suite 400 13    West Palm Beach, Florida 33401 14 15    ALSO PRESENT: 16    CARA L. HOLMES, ESQUIRE 17    1220 N.W. 157th Avenue 18    Pembroke Pines, Florida 33028 19    ADAM D. HOROWITZ, ESQUIRE 20    MERMELSTEIN &amp; HOROWITZ, P.A. 21    18205 Biscayne Boulevard, Suite 2218 22    Miami, Florida 33160 23 24 25</p>	<p>4</p> <p>1     PROCEEDINGS 2 3     Deposition taken before Wendy Beath Anderson, 4     Certified Realtime Reporter and Notary Public in and for 5     the State of Florida at Large, in the above cause. 6 7     MR. EDWARDS: We're going to put something on 8     the record about -- well, we'll do it this way -- 9     MR. REINHART: Do it at the end, after we get 10    him -- whatever you want. It's your show. 11    MR. EDWARDS: Okay. There were -- I don't 12    even think Mr. Willits is aware of this. There was 13    a subpoena duces tecum for this witness, as well as 14    the previous witness, which was another pilot, Dave 15    Rogers, and that duces tecum was to bring the 16    flight logs related from 1998 through 2005. What 17    was produced at the previous deposition were flight 18    logs from 2002 through 2005, and now Mr. Reinhart 19    has agreed to produce the remainder of the flight 20    logs requested, those going from 1998 through 2002. 21    MR. REINHART: Correct. They're pilot logs, 22    not flight logs. There are other records we 23    indicated are corporate records, and with those you 24    have to deal with Mr. Critton. 25    MR. CRITTON: However, with the proviso, too,</p>



October 15, 2009

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women?

MR. CRITTON: Form.

THE WITNESS: No.

BY MR. EDWARDS:

Q. You think that this is just a story that a  
bunch of underage women have made up?

A. Speculation.

MR. CRITTON: Objection. Now it's  
argumentative. Who gives a darn what he thinks one  
way or another? If he has personal knowledge -

MR. EDWARDS: You're objecting to the form?

MR. CRITTON: It's argumentative.

MR. EDWARDS: You're objecting to the form?

MR. CRITTON: Yes.

MR. EDWARDS: Okay.

BY MR. EDWARDS:

Q. Is that something that you believe that a  
bunch of women -- some of which know each other, some  
don't, some of which have been on the airplane and some  
which haven't -- made this up, that Jeffrey Epstein  
engaged in some sexual conduct with them?

MR. CRITTON: Form.

THE WITNESS: What I believe doesn't matter in  
this case, does it?

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1 Q. All right. When you read in the newspapers  
2 the allegations that Mr. Epstein was involved with  
3 numerous underage girls for sexual reasons, were you  
4 surprised?

5 A. I didn't believe it.

6 Q. Do you believe it today?

7 A. I don't believe it.

8 Q. You don't believe that Jeffrey Epstein was  
9 involved with underage girls in a sexual way?

10 MR. CRITTON: Form.

11 THE WITNESS: You're asking for my opinion,  
12 and I don't think my opinion is relevant in that  
13 matter.

14 BY MR. EDWARDS:

15 Q. I think it's relevant. Can you just tell me  
16 whether today you believe that Jeffrey Epstein has  
17 engaged in sex with underage girls?

18 MR. CRITTON: Form; speculation, irrelevant,  
19 always.

20 THE WITNESS: It's irrelevant.

21 BY MR. EDWARDS:

22 Q. I need an answer.

23 A. I don't believe he had sex with underage  
24 women.

25 Q. Or engaged in any sexual acts with underage

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1 BY MR. EDWARDS:

2 Q. I need an answer. Do you believe it? Do you  
3 believe these girls made this up?

4 MR. CRITTON: Form.

5 MR. REINHART: I'm going to instruct him not  
6 to answer. Move on.

7 MR. EDWARDS: Is there a privilege that we're  
8 asserting?

9 MR. REINHART: No, it's irrelevant. It's  
10 harassment and not likely to lead to discoverable  
11 evidence.

12 MR. EDWARDS: I'm going to put on the record  
13 right now that it is -- we are allowed discovery  
14 into a RICO count. We are also allowed discovery  
15 into the intent of Mr. Epstein in developing a  
16 criminal enterprise designed to sexually exploit  
17 and sexually abuse underage girls. We believe that  
18 in doing so, he associated intentionally with  
19 people of similar beliefs that sex with underage  
20 girls is okay, and that there have been many  
21 discussions with this witness, as well as many  
22 other witnesses with -- to insure his protection  
23 from law enforcement that they not answer these  
24 specific questions. And thus, the opinions and  
25 beliefs of all of these witnesses that we are

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<p style="text-align: center;">69</p> <p>1       alleging associated with this criminal enterprise 2       are certainly reasonably calculated to lead to the 3       discovery of admissible evidence. And if you're 4       still instructing the witness, based on that 5       proffer, not to answer any of these questions, I'm 6       going to continue to ask the questions and you can 7       instruct him not to answer and we can go to the 8       Court.</p> <p>9       MR. REINHART: My response is to his opinion 10      whether people making allegations in this case are 11      colluding or making up a story is irrelevant to 12      what you just said. So I am going to instruct him 13      not to answer any question that goes to his opinion 14      of someone else's motivation or the truth of facts 15      to which he has no knowledge.</p> <p>16      So yes, I'm instructing him not to answer.</p> <p>17      MR. CRITTON: Let me add in my part, is that I 18      think -- you're certainly not only capable to ask 19      questions with regard to what his personal 20      knowledge is, and if he knows something or he has 21      reasonable basis for it; certainly you are entitled 22      to that information. I think you've asked those 23      questions and he's given you straightforward 24      answers as to what he knew or what he didn't know 25      under those circumstances. And as to what his</p>	<p style="text-align: center;">71</p> <p>1       A. It's an opinion, and I believe that he has 2       not.</p> <p>3       Q. Okay. Isn't it true that at some point in 4       time you learned that Jeffrey Epstein has -- strike 5       that.</p> <p>6       MR. CRITTON: When you ultimately get to a 7       good place to break, will you let us know?</p> <p>8       MR. EDWARDS: Let's break now. (A break was had at 11:28 a.m.)</p> <p>10      BY MR. EDWARDS:</p> <p>11      Q. All right. Eighteen years of being a pilot 12      for Jeffrey Epstein and in terms of being able to name 13      somebody that you would say you've observed with Jeffrey 14      Epstein and would classify that person as Jeffrey 15      Epstein's friend, can you name anybody?</p> <p>16      A. Nadia, Sarah; just people that we see 17      routinely on the airplane.</p> <p>18      Q. That's people you see routinely in the last 19      five to ten years, right?</p> <p>20      A. Yes.</p> <p>21      Q. Prior to that time, anybody that you've 22      noticed as Jeffrey Epstein's friend may be Ghislaine 23      Maxwell?</p> <p>24      A. What time frame?</p> <p>25      Q. Is that a person that at some point in time</p>
<p style="text-align: center;">70</p> <p>1       thoughts are on something which he has no factual 2       basis or even an assumption to know one way or 3       another is irrelevant. That's ultimately for a 4       fact-finder in this case.</p> <p>5       While it's interesting, it's argumentative and 6       I don't think he's -- I mean, do it on a 7       question-by-question basis. If he has knowledge, 8       that's great, but to argue your case with this 9       witness or any other witness doesn't serve a 10      purpose and I think is, you know -- I think it's 11      not a good use of our time, I'll put it that way. 12      But you know, you can go ahead and ask.</p> <p>13      MR. EDWARDS: I can ask the question and if 14      the witness is being instructed not to answer, 15      we'll let a judge decide whether he needs to answer 16      the question and whether it's discoverable or not.</p> <p>17      MR. REINHART: Absolutely. Make your record.</p> <p>18      BY MR. EDWARDS:</p> <p>19      Q. Do you have any reason to believe that Jeffrey 20      Epstein engaged in sexual activity with underage women?</p> <p>21      A. I have no reason to believe.</p> <p>22      Q. Okay. So as you sit here today, based on your 23      18 years of knowledge, experience and observation of 24      Jeffrey Epstein, is it your belief that he has not had 25      sex or engaged in sexual activity with underage women?</p>	<p style="text-align: center;">72</p> <p>1       you would classify as Jeffrey Epstein's friend?</p> <p>2       A. I would classify it. I don't know if it's 3       true.</p> <p>4       Q. But that's only because they were on the 5       airplane together?</p> <p>6       A. Yes.</p> <p>7       Q. Do you know what Jeffrey Epstein does for a 8       living in your 18 years of observing and talking with 9       Jeffrey Epstein?</p> <p>10      A. No.</p> <p>11      Q. No idea?</p> <p>12      A. No.</p> <p>13      Q. Ever asked him?</p> <p>14      A. No, actually.</p> <p>15      Q. Ever been curious?</p> <p>16      A. Sure.</p> <p>17      Q. Ever done anything to satisfy that curiosity?</p> <p>18      A. If you mean Google it, not really, actually. 19      I mean, I really have not.</p> <p>20      Q. Okay. So in 18 years of traveling and being 21      the pilot and driving -- and taking this person, Jeffrey 22      Epstein, from one property in New York to New Mexico and 23      Florida and around the world, you have no idea what he 24      does in terms of how he makes money?</p> <p>25      A. No, sir.</p>

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MR. CRITTON: Form.  
THE WITNESS: No.

BY MR. EDWARDS:

Q. If you had been aware that Mr. Epstein was --  
and by this -- this is more in the form of a  
hypothetical, and that I'm not going to suggest to you  
it's a fact that he was. But if you had been aware that  
every single day Jeffrey Epstein's goal was to locate  
underage girls for the purposes of sex, and either have  
sex with them on the airplane or at some other  
designation that you were destination that you were  
traveling him to, would you have continued to pilot  
those planes?

MR. CRITTON: Form.  
THE WITNESS: You said it was hypothetical?

BY MR. EDWARDS:

Q. Right, it is a hypothetical.  
A. Why would I want to answer that? Because  
you're being hypothetical. I mean, it would obviously  
be wrong.

Q. Sure. Well, a hypothetical question is a  
legal question that I'm allowed to ask.

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1 A. Okay.  
2 Q. And I'm just asking you if you did have  
3 knowledge that Jeffrey Epstein was having sex with  
4 little girls either on the plane or at a place that you  
5 were taking him to or from on a daily basis, that's what  
6 he did, would you have continued to be his pilot?

7 MR. CRITTON: Let me object. Object to the  
8 form. It's argumentative. It has no more value  
9 than assuming he was chopping up bodies or anybody  
10 was chopping up bodies in the plane you're flying.  
11 What difference does it make? Form.

12 MR. EDWARDS: What difference does it make in  
13 a case about him having sex with little girls? I'm  
14 not going to argue with you about it. You've  
15 stated your objection.

16 MR. CRITTON: Exactly. It's an argumentative  
17 question.

18 MR. EDWARDS: I'm not going to argue with you  
19 about it.

20 MR. CRITTON: You're arguing with him about  
21 now.

22 MR. EDWARDS: No, I'm asking him the  
23 hypothetical.

24 BY MR. EDWARDS:

25 Q. Can you answer that? Would you have continued

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1 to be a pilot for somebody who's traveling to and from  
2 destinations with the goal of having sex with underage  
3 girls?

4 MR. CRITTON: Form.

5 THE WITNESS: It could be any person. It  
6 doesn't have to be Jeffrey Epstein, then, right?

7 BY MR. EDWARDS:

8 Q. True.

9 A. No, I wouldn't pilot an airplane if there was  
10 wrongdoing going on.

11 Q. That you knew about?

12 A. That I knew you about, sure.

13 Q. Me reading this complaint to you, is this the  
14 first time you've heard these allegations --

15 A. Yes.

16 Q. -- against Mr. Epstein?

17 A. Yes.

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1 which he pled guilty to --  
2 MR. CRITTON: Form.  
3 MR. REINHART: Can we -- for purposes of your  
4 hypothetical, what facts do you want him to assume  
5 are true? You said the facts to which he pled  
6 guilty, but the witness already said he doesn't  
7 know what he pled guilty to. He knows the charge  
8 he doesn't know the facts.

9 BY MR. EDWARDS:

10 Q. Solicitation of prostitution of a minor,  
11 somebody under the age of 18.

12 MR. EDWARDS: That's the charge, right,  
13 solicitation of prostitution of a minor?

14 MR. CRITTON: No. I think you've got it  
15 wrong. I'll object to the form.

16 MR. EDWARDS: Okay.

17 BY MR. EDWARDS:

18 Q. Then we'll handle the question this way: If  
19 you were to believe based on information and evidence  
20 that Mr. Epstein engaged in sex or some form of sex act  
21 with people of the age range of 12, 13, 14, 15 years  
22 old, would you continue your employment with  
23 Mr. Epstein?

24 MR. CRITTON: Form; speculation.

25 THE WITNESS: I would certainly be speculating

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1 and I have to discuss it with my wife long and  
2 hard, I don't think I could give you a correct and  
3 honest answer at this time.

4 BY MR. EDWARDS:

5 Q. Okay. Given the allegations that have been  
6 made in this case, is this something that you have  
7 discussed with anyone other than your attorney?

8 A. No, not really. Only from the fact that  
9 they're allegations and there's still a lot more work,  
10 I'm sure, to be discovered.

11 MR. CRITTON: Let me put on there, for the --  
12 if this deposition is not typed -- and we request  
13 it -- I'd like at least this portion where  
14 Mr. Edwards' last question back about five pages  
15 worth, so just if you could mark it from this  
16 page back about five pages.

17 If nobody requests the deposition, I'd just  
18 like those five pages.

19 MR. EDWARDS: I'm going to request the  
20 deposition, so...

21 MR. CRITTON: Okay. We'll mark this then, so  
22 you could tell me where it is, approximately.

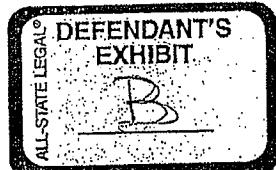
23 BY MR. EDWARDS:

24 Q. Is there a reason why you have not discussed  
25 with Jeffrey Epstein the allegations that have been m:

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1	3
IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA	
VOLUME I Pages 1 to 200	
1 L.M., 2 Plaintiff, 3 vs. 4 JEFFREY EPSTEIN, 5 Defendant. 6 7	APPEARANCE OF COUNSEL 1 On behalf of the Defendant: 2 ATTERBURY, GOLDBERGER & WEISS 3 BY: JACK ALAN GOLDBERGER, ESQ., 4 250 Australian Avenue 5 Suite 1400 6 West Palm Beach, FL 33401 7 561-659-6300 8 igoldberger@agwpa.com
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	On behalf of the Defendant by telephone: 8 BURMAN, CRITTON, LUTTIER & COLEMAN 9 BY: MICHAEL J. PIKE, ESQ., 10 515 N. Flagler Drive 11 Suite 400 12 West Palm Beach, FL 33401 13 561-842-2820 14 mpike@bclclaw.com 15 16 On behalf of the witness: 17 LAW OFFICE OF BRUCE E. REINHART 18 BY: BRUCE E. REINHART, ESQ., 19 One Clearlake Center 20 250 S. Australian Avenue 21 Suite 1400 22 West Palm Beach, FL 33401 23 561-202-6360 24 BReinhart@BruceREinhartLaw.com 25
2	4
1 APPEARANCES OF COUNSEL 2 On behalf of the Plaintiff L.M.: 3 ROTHSTEIN, ROSENFIELD & ADLER 4 BY: BRADLEY J. EDWARDS, ESQ. and MICHAEL WHEELER, ESQ., 401 East Las Olas Boulevard 5 Suite 1650 6 Fort Lauderdale, FL 33394 7 954-522-3456 8 bedwards@rra-law.com 9 mwheeler@rra-law.com 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	INDEX OF EXAMINATION 1 WITNESS: 2 LARRY EUGENE MORRISON 3 Page 4 5 DIRECT EXAMINATION 6 By Mr. Edwards #5 7 8 CROSS-EXAMINATION 9 By Ms. Ezell #190 10 CROSS-EXAMINATION 11 By Mr. Willits #195 12 13 CROSS-EXAMINATION 14 By Mr. Pike #196 15 16 FURTHER INDIRECT EXAMINATION 17 By Mr. Edwards #199 18 19 20 21 22 23 24 25 --- 15 INDEX TO EXHIBITS 16 17 Plaintiff's 18 Exhibit Description Page 19 1 Twenty-four pages of "JEGE, Inc., Passenger Manifest." #138 20 21 22 23 24 25 (Plaintiff's Composite 1 was attached to the original transcript and copies of the transcript.)



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1 A. I have no idea, I don't know.  
2 Q. When you say that Nadia Marcinkova was just  
3 coming in the picture, what's your understanding as to  
4 who Nadia Marcinkova is relative to Mr. Epstein?

5 A. I don't know, I don't understand. I  
6 don't know. I didn't know if maybe she was like an  
7 exchange -- Jeffrey always appeared to be very  
8 involved in education and philanthropy. I didn't  
9 know if she was an exchange-type student or something  
10 or what. I don't know.

11 Q. When you say he appeared to be "involved in,"  
12 what do you mean?

13 A. Educational things, foundations, science  
14 foundations, and things.

15 Q. Speaking of - the Florida Science Foundation  
16 is a place where, when he was on work release, he spent a  
17 lot of time there, you're aware of that?

18 A. That's what I've heard, yeah.

19 Q. What does that place do?

20 A. I have no idea.

21 Q. Does it do anything?

22 A. I don't know. I don't know anything about  
23 it.

24 Q. Certainly you've read certain newspaper  
25 articles about the allegations, police reports,

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1 otherwise, the allegations that occurred or have been  
2 alleged to have occurred at his Palm Beach mansion,  
3 correct?

4 A. Uh-huh.

5 Q. Correct?

6 A. Correct.

7 Q. Given the nature of those allegations, would  
8 you leave your daughter of 17, 16, 15 years old with Mr.  
9 Epstein alone?

10 MR. PIKE: Form. Move to strike.

11 A. Yes.

12 Q. You would?

13 A. (Witness nods head.)

14 Q. And why?

15 A. Because I don't fear that he would try  
16 anything with my daughter. He showed -- When I  
17 worked for him he showed me respect. He never -- I  
18 never -- He never showed me disrespect. He would ask  
19 how the family is. I mean, not on a personal level,  
20 but an employer/employee.

21 Q. Right. Okay.

22 A. He never showed me any reason not to trust  
23 him.

24 Q. But you're not a 13-year old girl, so.

25 A. No, but, like I say, he never showed me

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1 Q. And despite pleading guilty to procuring  
2 underage girls for the purposes of sex, you still feel  
3 comfortable leaving a 13, 14, 15-year-old girl around  
4 him?

5 MR. PIKE: Form. Move to strike.

6 A. Yes, I mean, with my daughter, yes. I  
7 don't know how he behaves around anybody else. I  
8 just know that the respect that he showed me, I feel  
9 safe with my daughter.

10 Q. And have you read in detail the reports as to  
11 what happened at his house with the girls?

12 A. Only -

13 MR. PIKE: Form.

14 A. - what's been in the newspapers and  
15 published.

16 Q. If you read and hear testimony given - well, I  
17 can tell you now - testimony has been given in this case  
18 that what happens is: A 13 or 14 year old is led  
19 upstairs by herself, told to get naked, he lays down on  
20 his back, there is a brief massage before he turns over,  
21 exposes himself erect, masturbates while he tells this 13  
22 or 14 year old to pinch his nipples as hard as she can  
23 while he inserts his fingers into their vagina and  
24 ejaculates all over them before saying, "Take your money  
25 and leave."

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1 MR. PIKE: Form. Move to strike.

2 BY MR. EDWARDS:

3 Q. Okay? Then, "You can continue to come back  
4 for \$200 every time or every girl you bring me within  
5 your age group and I get to do this again, I pay you \$200  
6 per person." If that is the testimony -

7 MR. PIKE: Form.

8 Q. - that what happens behind closed doors with  
9 him, do you still feel comfortable leaving a 13 or 14  
10 year old in a room with Jeffrey Epstein?

11 MR. PIKE: Form.

12 A. If that, in fact, is what actually  
13 happened, no.

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1 you witnessed Jeffrey Epstein committing?  
2 A. No.  
3 Q. Would you ~  
4 A. No.  
5 Q. -- go back - considering what you've read and  
6 what you may or may not believe - would you go back to  
7 working for Jeffrey Epstein?  
8 MR. PIKE: Form.  
9 A. I can't say. I still work for him on a  
10 maintenance - to maintain the airplanes and stuff  
11 like that, so.  
12 Q. You're on his payroll?  
13 A. Salaried, yes.  
14 Q. Do you know who else is on his payroll?  
15 A. Well, Dave and Larry.  
16 Q. Certainly, if I want to know more about his  
17 private life - do you know who's at his house?  
18 A. No.  
19 Q. Do you know who his housekeeper is?  
20 A. No.  
21 Q. Do you know who his architect is?  
22 A. No, no.  
23 Q. Does Larry visit him at his house?  
24 A. I would assume so.  
25 Q. Why do you say you would assume so? That