

McCawley Declaration

COMPOSITE

EXHIBIT 9

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendants.

Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,
08-80994, 08-80811, 08-80893, 09-80469,
09-8-591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF NADIA MARCINKOVA
TAKEN ON BEHALF OF THE PLAINTIFF

DATE: April 13, 2010

<p style="text-align: right;">54</p> <p>1 A Fifth.</p> <p>2 Q Do you know Bill Clinton?</p> <p>3 A Fifth.</p> <p>4 Q You have been on Jeffrey Epstein's</p> <p>5 airplane with Bill Clinton?</p> <p>6 MR. YAREMA: Object to the form.</p> <p>7 A Fifth.</p> <p>8 Q Isn't take true you have been on Jeffrey</p> <p>9 Epstein's airplane with Doug Band, Bill Clinton's</p> <p>10 righthand man?</p> <p>11 MR. YAREMA: Object to the form.</p> <p>12 A Fifth.</p> <p>13 Q Have you witnessed improper sexual</p> <p>14 activity between Jeffrey Epstein and minors,</p> <p>15 while he was in the presence of Bill Clinton?</p> <p>16 MR. YAREMA: Object to the form.</p> <p>17 A Fifth.</p> <p>18 Q How many times have you ridden on the</p> <p>19 airplane with Jean Luc Brunel?</p> <p>20 MR. YAREMA: Object to the form.</p> <p>21 A Fifth.</p> <p>22 Q Each time that Jean Luc Brunel visits</p> <p>23 Jeffrey Epstein's house, does he bring underage</p> <p>24 minors to Jeffrey Epstein's house to engage in</p> <p>25 sex with?</p>	<p style="text-align: right;">56</p> <p>1 Jeffrey Epstein specifically flew to Palm Beach</p> <p>2 for the purposes of engaging in sex acts with</p> <p>3 Jane Doe?</p> <p>4 MR. YAREMA: Object to the form.</p> <p>5 A Fifth.</p> <p>6 Q Generally, isn't it true Jeffrey Epstein</p> <p>7 would fly from place to place for the purpose of</p> <p>8 engaging in sexual activity with minors at his</p> <p>9 destination?</p> <p>10 MR. YAREMA: Object to the form.</p> <p>11 A Fifth.</p> <p>12 Q Isn't it true that he employed numerous</p> <p>13 people for the sole purpose of scheduling</p> <p>14 appointments with underage minor females at each</p> <p>15 destination he landed?</p> <p>16 MR. YAREMA: Object to the form.</p> <p>17 A Fifth.</p> <p>18 Q What is Jeffrey Epstein's relationship</p> <p>19 with Sandy Berger?</p> <p>20 MR. YAREMA: Object to the form.</p> <p>21 A Fifth.</p> <p>22 Q Do you know what Jeffrey Epstein's</p> <p>23 relationship is with Alan Dershowitz?</p> <p>24 MR. YAREMA: Object to the form.</p> <p>25 A Fifth.</p>
<p style="text-align: right;">55</p> <p>1 MR. YAREMA: Object to the form.</p> <p>2 A Fifth.</p> <p>3 Q Do you know Glenn Dubin?</p> <p>4 A Fifth.</p> <p>5 Q Do you know Aline Weber?</p> <p>6 A Fifth.</p> <p>7 Q Is that somebody that was a sexual abuse</p> <p>8 victim at one point in time of Jeffrey Epstein</p> <p>9 and Jean Luc Brunel?</p> <p>10 MR. YAREMA: Object to the form.</p> <p>11 A Fifth.</p> <p>12 Q Between 2002 and 2005 when E.W. was</p> <p>13 abused by Jeffrey Epstein sexually, isn't it true</p> <p>14 that Jeffrey Epstein took flights to Palm Beach</p> <p>15 for the purposes of sexually abusing E.W.?</p> <p>16 MR. YAREMA: Object to the form.</p> <p>17 A Fifth.</p> <p>18 Q And between those same years of 2002 and</p> <p>19 2005, isn't it true that Jeffrey Epstein took</p> <p>20 airplane flights to Palm Beach from places</p> <p>21 outside of the State, to engage in sexual acts</p> <p>22 with L.M.?</p> <p>23 MR. YAREMA: Object to the form.</p> <p>24 A Fifth.</p> <p>25 Q From 2003 through 2005, isn't it true</p>	<p style="text-align: right;">57</p> <p>1 Q That's somebody who you know to have</p> <p>2 stayed at Jeffrey Epstein's house on many</p> <p>3 occasions, correct?</p> <p>4 MR. YAREMA: Object to the form.</p> <p>5 A Fifth.</p> <p>6 Q And also somebody who you know to have</p> <p>7 been at the house when E.W. was in Jeffrey</p> <p>8 Epstein's bedroom getting sexually abused,</p> <p>9 correct?</p> <p>10 MR. YAREMA: Object to the form.</p> <p>11 A Fifth.</p> <p>12 Q Alan Dershowitz is also somebody that</p> <p>13 you also know to have been at the house when L.M.</p> <p>14 was being sexually abused in Jeffrey Epstein's</p> <p>15 bedroom, correct?</p> <p>16 MR. YAREMA: Object to the form.</p> <p>17 A Fifth.</p> <p>18 Q Generally, Alan Dershowitz is familiar</p> <p>19 with Jeffrey Epstein's habit of engaging in</p> <p>20 sexual acts with minors on a daily basis,</p> <p>21 correct?</p> <p>22 MR. YAREMA: Object to the form.</p> <p>23 A Fifth.</p> <p>24 Q When Alan Dershowitz was in town,</p> <p>25 Jeffrey Epstein did not break his schedule for</p>

58	<p>1 Alan Dershowitz, meaning he continued to sexually</p> <p>2 abuse minors despite Alan Dershowitz being a</p> <p>3 guest in the house?</p> <p>4 MR. YAREMA: Object to the form.</p> <p>5 A Fifth.</p> <p>6 Q Alan Dershowitz never engaged in any</p> <p>7 sexual activity with these underage minors; isn't</p> <p>8 that true?</p> <p>9 MR. YAREMA: Object to the form.</p> <p>10 A Fifth.</p> <p>11 Q Have you been made to have sex with</p> <p>12 Ghislaine Maxwell?</p> <p>13 MR. YAREMA: Object to the form.</p> <p>14 A Fifth.</p> <p>15 Q Do you know Emmy Taylor?</p> <p>16 A Fifth.</p> <p>17 Q Similar to you being Jeffrey Epstein's</p> <p>18 sex slave, is Emmy Taylor, or was Emmy Taylor</p> <p>19 Ghislaine Maxwell's sex slave?</p> <p>20 MR. YAREMA: Object to the form.</p> <p>21 A Fifth.</p> <p>22 Q Ghislaine Maxwell is somebody who you</p> <p>23 know to be bi-sexual, true?</p> <p>24 MR. YAREMA: Object to the form.</p> <p>25 A Fifth.</p>	60	<p>1 Q What was the purpose of that flight?</p> <p>2 MR. YAREMA: Object to the form.</p> <p>3 A Fifth.</p> <p>4 Q Did you sign a confidentiality agreement</p> <p>5 with Jeffrey Epstein?</p> <p>6 MR. YAREMA: Object to the form.</p> <p>7 A Fifth.</p> <p>8 Q When is the last time that you observed</p> <p>9 Jeffrey Epstein have sex with a minor?</p> <p>10 MR. YAREMA: Object to the form.</p> <p>11 A Fifth.</p> <p>12 Q Since being on probation, has Jeffrey</p> <p>13 Epstein been able to, or has he flown to his</p> <p>14 island?</p> <p>15 MR. YAREMA: Object to the form.</p> <p>16 A Fifth.</p> <p>17 Q To your knowledge, has Jeffrey Epstein</p> <p>18 flown to New York while on probation or community</p> <p>19 control?</p> <p>20 MR. YAREMA: Object to the form.</p> <p>21 A Fifth.</p> <p>22 Q Isn't it true that he has flown both to</p> <p>23 New York and to his island, and you have</p> <p>24 accompanied him on those trips, since he was on</p> <p>25 community control?</p>
59	<p>1 Q You know that Ghislaine Maxwell engaged</p> <p>2 in sexual acts with underage minor females, true?</p> <p>3 MR. YAREMA: Object to the form.</p> <p>4 A Fifth.</p> <p>5 Q This is yet another friend of Jeffrey</p> <p>6 Epstein's that is into the act of molesting</p> <p>7 underage minor females, right?</p> <p>8 MR. YAREMA: Object to the form.</p> <p>9 A Fifth.</p> <p>10 Q Now, you are the next participant in</p> <p>11 that activity, meaning you have been groomed to</p> <p>12 enjoy and appreciate the acts of sex with</p> <p>13 underage minors, true?</p> <p>14 MR. YAREMA: Object to the form.</p> <p>15 A Fifth.</p> <p>16 Q Has Jeffrey Epstein instructed you to</p> <p>17 lie to his Probation Officer in any way?</p> <p>18 MR. YAREMA: Object to the form.</p> <p>19 A Fifth.</p> <p>20 Q Mr. Visoski testified that you took a</p> <p>21 helicopter flight within the last year with</p> <p>22 Jeffrey Epstein to Miami. Do you remember that</p> <p>23 flight?</p> <p>24 MR. YAREMA: Object to the form.</p> <p>25 A Fifth.</p>	61	<p>1 MR. YAREMA: Object to the form.</p> <p>2 A Fifth.</p> <p>3 Q Isn't it also true that Jeffrey Epstein</p> <p>4 has indicated to you that he will always engage</p> <p>5 in sex acts with underage minor females?</p> <p>6 MR. YAREMA: Object to the form.</p> <p>7 A Fifth.</p> <p>8 Q In fact, that's something that he has</p> <p>9 told you, that he believes he is entitled to do;</p> <p>10 isn't that right?</p> <p>11 MR. YAREMA: Object to the form.</p> <p>12 A Fifth.</p> <p>13 Q Isn't it true that Jeffrey Epstein</p> <p>14 believes and has told you that if he doesn't</p> <p>15 physically force the underage minor female into</p> <p>16 any act, then he is entitled to engage in sex</p> <p>17 with any underage minor female despite the age?</p> <p>18 MR. YAREMA: Object to the form.</p> <p>19 A Fifth.</p> <p>20 Q What is the youngest female you have</p> <p>21 witnessed or observed Jeffrey Epstein to engage</p> <p>22 in sex with?</p> <p>23 MR. YAREMA: Object to the form.</p> <p>24 A Fifth.</p> <p>25 Q Do you have a bank account at Chase Bank</p>

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,
Plaintiff,

-vs- VOLUME II OF III
JEFFREY EPSTEIN,
Defendant.

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

VIDEOTAPED DEPOSITION OF
SARAH KELLEN

Wednesday, March 24, 2010
10:37 - 6:51 p.m.

250 Australian Avenue South
Suite 1500
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting
Job No.: 1484

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 502008CA028051XXXXMB AB

L.M.,

Plaintiff,

-vs- VOLUME II OF III

JEFFREY EPSTEIN,

Defendant.

VIDEOTAPED DEPOSITION OF SARAH KELLEN

Wednesday, March 24, 2010
10:37 - 6:51 p.m.

250 Australian Avenue South
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 502008CA028058XXXXMB AD

E.W.,

Plaintiff,

-vs- VOLUME II OF III

JEFFREY EPSTEIN,

Defendant.

DEPOSITION OF SARAH KELLEN

Wednesday, March 24, 2010
10:37 - 6:51 p.m.

250 Australian Avenue South
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE No.502008CA037319XXXXMB AB

B.B.

Plaintiff,

-vs- VOLUME II OF III

JEFFREY EPSTEIN
AND SARAH KELLEN,

Defendants.

VIDEOTAPED DEPOSITION OF
SARAH KELLEN

Wednesday, March 24, 2010
10:37 - 6:51 p.m.

250 Australian Avenue South
Suite 1500
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1 the shape of a penis and vagina. Once again, not
 2 necessarily with respect to Mr. Epstein's home, in
 3 your entire life have you ever seen soap in the
 4 shape of a penis and vagina?
 5 A. Not that I recall.
 6 Q. Do you ever recall being in Ohio?
 7 MR. RHEINHART: Ever in her life?
 8 MR. KUVIN: The state, ever in her life.
 9 BY MR. KUVIN:
 10 Q. Let's start there, recall being in the
 11 State of Ohio for any reason?
 12 A. Maybe for a layover, but not that I
 13 specifically remember.
 14 Q. Okay. Do you know an Ivan Robles?
 15 A. No.
 16 Q. Have you seen a gentleman by the name of
 17 Alan Dershowitz at the home of Jeffrey Epstein
 18 before?
 19 MR. RHEINHART: Objection to the form.
 20 Standing objection, presumes knowledge of
 21 Jeffrey Epstein or his home. Instruct the
 22 witness not to answer.
 23 THE WITNESS: On the instruction of my
 24 lawyer, I must exercise my Fifth Amendment
 25 right.

1 THE WITNESS: On the instruction of my
 2 lawyer, I must invoke my Fifth Amendment right.
 3 BY MR. KUVIN:
 4 Q. Do you agree that these corporations that
 5 I just mentioned were utilized by Jeffrey Epstein in
 6 an attempt to have sexual relationships with
 7 underage girls?
 8 MR. RHEINHART: Objection to the form as
 9 to compound, and also assumes knowledge of
 10 Mr. Epstein, asks for more than one answer to
 11 the question. I would instruct her not to
 12 answer based on her Fifth Amendment privilege
 13 because the question assumes knowledge of
 14 Mr. Epstein.
 15 THE WITNESS: Upon instruction of my
 16 lawyer I must invoke my Fifth Amendment right.
 17 MR. KUVIN: I think I am done. Hang on
 18 one second.
 19 All right. I appreciate it. That's all
 20 the questions I have at this time. Reserve the
 21 right to ask any follow-up questions if other
 22 attorneys raise new and different issues by
 23 their questioning.
 24 MR. RHEINHART: Understood.
 25 MR. KUVIN: Pass the witness at this time.

1 BY MR. KUVIN:
 2 Q. Have you ever heard of the El Zorro Ranch
 3 Corporation?
 4 MR. RHEINHART: Instruct the witness not
 5 to answer based on her Fifth Amendment
 6 privilege.
 7 THE WITNESS: On the instruction of my
 8 lawyer I must exercise my Fifth Amendment
 9 right.
 10 BY MR. KUVIN:
 11 Q. Have you ever heard of the New York
 12 Strategy Group?
 13 MR. RHEINHART: Same instruction.
 14 THE WITNESS: On the instruction of my
 15 lawyer, I must invoke my Fifth Amendment right.
 16 BY MR. KUVIN:
 17 Q. Have you ever heard of the Ghislaine
 18 Corporation?
 19 MR. RHEINHART: Same instruction.
 20 THE WITNESS: On the instruction of my
 21 lawyer, I must invoke my Fifth Amendment right.
 22 BY MR. KUVIN:
 23 Q. Have you ever heard of the Financial
 24 Strategy Group?
 25 MR. RHEINHART: Same instruction.

1 Who wants to go? Mr. Horowitz, do you have a
 2 microphone?
 3 MR. HOROWITZ: I do.
 4 CROSS (SARAH KELLEN)
 5 BY MR. HOROWITZ:
 6 Q. Ms. Kellen, did you use the telephone
 7 number, the [REDACTED] at any time between 2001
 8 and 2006?
 9 A. On the advice of my lawyer, I must exercise my
 10 Fifth Amendment right.
 11 Q. Did you use the telephone number
 12 [REDACTED] between 2001 and 2006 at Jeffrey
 13 Epstein's expense?
 14 MR. RHEINHART: Objection to the form in
 15 that it assumes knowledge of Jeffrey Epstein.
 16 Standing objection as previously stated with
 17 Mr. Kuvin. Instruct the witness not to answer,
 18 based on her Fifth Amendment right.
 19 THE WITNESS: On the instruction of my
 20 lawyer, I must exercise my Fifth Amendment
 21 right.
 22 BY MR. HOROWITZ:
 23 Q. Did you use the telephone number
 24 [REDACTED] at Jeffrey Epstein's direction?
 25 MR. RHEINHART: Same objection as the

1 So can we focus on the specific questions
2 that she can answer or from which you can draw
3 an adverse inference if asked properly, and
4 let's move it along.

5 MS. EZEEL: Each young woman's case is an
6 individual case, and we have the right to ask,
7 ask whatever questions that we need to with
8 regard to each one.

9 MR. RHEINHART: I--

10 MR. GOLDBERGER: Let's just go forward
11 until 5:00 and see where we're at.

12 BY MR. WEISSING:

13 Q. Did you know that Jeffrey Epstein received
14 sexual gratification from directing others to
15 sexually abuse minor children?

16 MR. RHEINHART: Objection to the form.

17 THE WITNESS: On the instruction of my
18 lawyer, I must invoke the Fifth Amendment
19 right.

20 BY MR. WEISSING:

21 Q. Did you know that Jeffrey Epstein received
22 sexual gratification from directing Marcinkova to
23 sexually abuse minor children?

24 MR. RHEINHART: Objection to the form. It
25 assumes knowledge of a person named Marcinkova.

1 It is otherwise compound and objectionable.

2 THE WITNESS: On the instruction of my
3 lawyer, I must invoke my Fifth Amendment right.

4 MR. WEISSING: Let's go off the record for
5 a moment.

6 THE VIDEOGRAPHER: Are we all good with
7 going off the record?

8 MR. RHEINHART: Yeah, that's fine.

9 MR. HOROWITZ: Yes.

10 THE VIDEOGRAPHER: We're now off the
11 record at 4:22 p.m.

12 (A brief recess was held.)

13 THE VIDEOGRAPHER: We are now on the
14 record. It is 4:24 p.m.

15 BY MR. WEISSING:

16 Q. Do you know Nadia Marcinkova?

17 MR. KUVIN: Marcinkova.

18 THE WITNESS: On the instruction of my
19 lawyer, I must invoke my Fifth Amendment
20 privilege.

21 BY MR. WEISSING:

22 Q. Do you know -- have you procured minor
23 children to have sexual relations with

24 Nadia Marcinkova at Jeffrey Epstein's mansion?

25 MR. RHEINHART: Objection to the form.

1 THE WITNESS: On the instruction of my
2 lawyer, I must invoke my Fifth Amendment
3 privilege.

4 BY MR. WEISSING:

5 Q. Do you know Alan Dershowitz?

6 MR. RHEINHART: The question was asked and
7 answered about three-and-a-half hours ago.

8 THE WITNESS: On the instruction of my
9 lawyer, I must invoke my Fifth Amendment
10 privilege.

11 BY MR. WEISSING:

12 Q. Do you know David Copperfield?

13 MR. RHEINHART: That question was asked
14 about three-and-a-half-hours ago.

15 THE WITNESS: On the instruction of my
16 lawyer, I must invoke my Fifth Amendment
17 privilege.

18 BY MR. WEISSING:

19 Q. In addition to his place at, in Palm
20 Beach, are you aware that Jeffrey Epstein has an
21 apartment located at 301 East 66th Street, Apartment
22 14G through E in New York?

23 MR. RHEINHART: That question was asked
24 about four hours ago. It's been asked and
25 answered.

1 THE WITNESS: At the instruction of my
2 lawyer, I invoke my Fifth Amendment privilege.

3 BY MR. WEISSING:

4 Q. While in New York, have you procured
5 underage minor children to engage in sexual acts
6 with Jeffrey Epstein at that location?

7 MR. RHEINHART: Object to the form.

8 THE WITNESS: On the instruction of my
9 lawyer, I must invoke my Fifth Amendment
10 privilege.

11 BY MR. WEISSING:

12 Q. With regard to the minor children procured
13 for him at that location, were they school children
14 in the New York area?

15 MR. RHEINHART: The previous question,
16 objection to the form. The same as all the
17 previous questions, it assumes a fact that's
18 not been established. It can't fairly be
19 answered.

20 THE WITNESS: On the instruction of my
21 lawyer, I must invoke my Fifth Amendment
22 privilege.

23 BY MR. WEISSING:

24 Q. Did Jeffrey Epstein have sexual encounters
25 with underage people while at that apartment?

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VOLUME III OF III

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Rachel W. Bridge, RPR, FPR
Notary Public, State of Florida
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1 know what the Edge Group was, but whatever, you can
 2 answer the question.
 3 THE WITNESS: At the instruction of my lawyer,
 4 I must choose to invoke my Fifth Amendment right.
 5 BY MS. EZELL:
 6 Q. Do you know Max Brockman?
 7 MR. REINHART: I'm sorry, can you repeat?
 8 BY MS. EZELL:
 9 Q. Do you know a Max Brockman?
 10 MR. REINHART: I believe that was asked and
 11 answered already, but --
 12 THE WITNESS: At the instruction of my lawyer,
 13 I must invoke my Fifth Amendment right.
 14 BY MS. EZELL:
 15 Q. Have you ever been photographed with Max
 16 Brockman at an Edge Science dinner?
 17 A. At the instruction of my lawyer, I must invoke
 18 my Fifth Amendment right.
 19 MR. REINHART: You should let me -- I need to
 20 object to the form of the question first, but go
 21 ahead. I know we all want to get out of here. Go
 22 ahead.
 23 THE WITNESS: Say it again.
 24 MR. REINHART: No, you are okay. Go ahead,
 25 Ms. Ezell. Thank you.

1 BY MS. EZELL:
 2 Q. Do you want to respond? I didn't give you
 3 time.
 4 MR. REINHART: I've instructed her not to
 5 answer the question. Let's move on.
 6 BY MS. EZELL:
 7 Q. Do you recall a dinner at El Brillo Way
 8 attended by David Copperfield where Jane No. 103 was a
 9 guest?
 10 MR. REINHART: Objection to the form, lack of
 11 foundation, and a standing objection as to her
 12 knowledge of anything involving El Brillo Way or
 13 Jeffrey Epstein. Instruct her not to answer.
 14 THE WITNESS: At the instruction of my lawyer,
 15 I must invoke my Fifth Amendment right.
 16 BY MS. EZELL:
 17 Q. What is the relationship between Jeffrey
 18 Epstein and David Copperfield?
 19 MR. REINHART: Objection to form, lack of
 20 foundation as to her knowledge of either one of
 21 those people. Instruct her not to answer.
 22 THE WITNESS: At the instruction of my lawyer,
 23 I must invoke my Fifth Amendment right.
 24 BY MS. EZELL:
 25 Q. To your knowledge, do they recruit girls for

1 BY MS. EZELL:
 2 Q. Do you know whether Jeffrey Epstein attended
 3 the Edge Science dinner in Monterey, California?
 4 MR. REINHART: Objection to the form, lack of
 5 foundation. Instruct the witness not to answer.
 6 THE WITNESS: At the instruction of my lawyer,
 7 I must invoke my Fifth Amendment right.
 8 BY MS. EZELL:
 9 Q. You testified a moment ago that you were
 10 photographed nude by your boyfriend or a former
 11 boyfriend and that you hoped there are no photographs
 12 disseminated elsewhere.
 13 At what age were those photographs taken?
 14 MR. REINHART: I'm going to instruct her not
 15 to answer that. It has nothing to do with
 16 anything. It's not reasonably calculated to lead
 17 to discoverable evidence. We can move on.
 18 BY MS. EZELL:
 19 Q. Were you in any way damaged by that
 20 experience?
 21 MR. REINHART: Same instruction. Let's move
 22 on.
 23 BY MS. EZELL:
 24 Q. Do you have any regrets?
 25 MR. REINHART: Same instruction. Move on.

1 one another?
 2 MR. REINHART: Object to the form, compound,
 3 and again, lack of foundation. Instruct her not to
 4 answer.
 5 THE WITNESS: At the instruction of my lawyer,
 6 I must invoke my Fifth Amendment right.
 7 BY MS. EZELL:
 8 Q. To your knowledge, are they involved in any
 9 sexual trafficking of young women?
 10 MR. REINHART: Object to the form for the
 11 reasons previously stated. Also calls for a legal
 12 conclusion as to what sexual trafficking is.
 13 Instruct her not to answer.
 14 THE WITNESS: At the instruction of my lawyer,
 15 I must invoke my Fifth Amendment right.
 16 BY MS. EZELL:
 17 Q. I believe you asked about Allen Dershowitz
 18 earlier.
 19 MR. REINHART: Twice.
 20 BY MS. EZELL:
 21 Q. And were instructed not to answer.
 22 MR. REINHART: Twice.
 23 BY MS. EZELL:
 24 Q. All right. I'm going to ask again on behalf
 25 of my client. Are you aware of the friendship between

1 Allen Dershowitz and Jeffrey Epstein?
 2 MR. REINHART: And for the third time, I'll
 3 object to the form and instruct her not to answer
 4 the question.
 5 THE WITNESS: For the third time, I take the
 6 advice of my lawyer and invoke my Fifth Amendment
 7 right.
 8 BY MS. EZELL:
 9 Q. When Allen Dershowitz comes to Palm Beach, he
 10 stays at the El Brillo mansion, doesn't he?
 11 MR. REINHART: Objection to the form. There
 12 is no foundation for her having any knowledge of
 13 anything having to do with a person by the name of
 14 Allen Dershowitz. I instruct her not to answer.
 15 THE WITNESS: At the instruction of my lawyer,
 16 I must invoke my Fifth Amendment right.
 17 BY MS. EZELL:
 18 Q. When Allen Dershowitz, or has Allen Dershowitz
 19 ever been there when young ladies came to give massages?
 20 MR. REINHART: Same objection stated to the
 21 previous question. Same instruction.
 22 THE WITNESS: At the instruction of my lawyer,
 23 I must invoke my Fifth Amendment right.
 24 BY MS. EZELL:
 25 Q. Has Allen Dershowitz ever been the beneficiary

1 BY MS. EZELL:
 2 Q. Do you know that when David Copperfield is in
 3 town, he gives Jeffrey Epstein tickets and Jeffrey gives
 4 some to young women to attend those shows?
 5 MR. REINHART: Object to the form, multiple,
 6 compound question, and a complete lack of
 7 foundation. Instruct the witness not to answer.
 8 THE WITNESS: At the instruction of my lawyer,
 9 I must invoke my Fifth Amendment right.
 10 BY MS. EZELL:
 11 Q. And do you know that those girls are invited
 12 back stage after the show?
 13 MR. REINHART: Same objection, complete lack
 14 of foundation, and standing objection previously
 15 stated.
 16 THE WITNESS: At the instruction of my lawyer,
 17 I must invoke my Fifth Amendment right.
 18 BY MS. EZELL:
 19 Q. Do you remember on or about, in or about March
 20 of 2005 having conversations with one of the young women
 21 who came to the house to give massages about her
 22 conversations with Jane No. 103?
 23 MR. REINHART: Objection to the form, standing
 24 objection, lack of foundation. Instruct the
 25 witness not to answer, because the question implies

1 of those massages?
 2 MR. REINHART: Same objection and same
 3 instruction.
 4 THE WITNESS: At the instruction of my lawyer,
 5 I must invoke my Fifth Amendment right.
 6 BY MS. EZELL:
 7 Q. Do you know John Casablanca?
 8 A. Never heard that name before.
 9 Q. Have you ever heard of a world-famous
 10 illusionist whose stage name is David Copperfield?
 11 MR. REINHART: That's also been asked at least
 12 three times. I'll instruct her again not to answer
 13 the question.
 14 THE WITNESS: At the instruction of my lawyer,
 15 I must invoke my Fifth Amendment right.
 16 BY MS. EZELL:
 17 Q. Have you ever gone to one of David
 18 Copperfield's shows?
 19 MR. REINHART: Objection to form, lack of
 20 foundation as to knowledge of any person by the
 21 name of David Copperfield. Instruct her not to
 22 answer.
 23 THE WITNESS: At the instruction of my lawyer,
 24 I must invoke my Fifth Amendment right.
 25

1 that she has any knowledge at all of El Brillo Way.
 2 BY MS. EZELL:
 3 Q. Same question -- sorry.
 4 A. At the instruction of my lawyer, I must choose
 5 to invoke my Fifth Amendment privilege.
 6 Q. Same question as to March of 2006.
 7 MR. REINHART: Same objection and same
 8 instruction.
 9 THE WITNESS: At the instruction of my lawyer,
 10 I must choose to invoke my Fifth Amendment
 11 privilege.
 12 BY MS. EZELL:
 13 Q. Do you have any recollection of a conversation
 14 in which one of the young women told Jane No. 103 that
 15 those girls who, those girls who would help Jeffrey in
 16 regard to the investigation would be compensated and
 17 those who would not or who would hurt him in the
 18 investigation would be dealt with?
 19 MR. REINHART: Objection to the form, lack of
 20 foundation, compound question. Instruct the
 21 witness not to answer, because the question implies
 22 some knowledge of anything relating to a person by
 23 the name of Jeffrey Epstein.
 24 THE WITNESS: At the instruction of my lawyer,
 25 I must invoke my Fifth Amendment right.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-CV-80893-CIV-MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendants.

DEPOSITION OF ADRIANA ROSS
Volume 1 of 1
Pages 1 through 138
Videotaped

Monday, March 15, 2010
10:13 a.m. - 12:42 p.m.
U.S. Legal Support
515 East Las Olas Boulevard, 3rd Floor
Fort Lauderdale, Florida 33301

Stenographically Reported By:
Janet L. McKinney, RPR, FPR, CLR
Registered Professional Reporter
Florida Professional Reporter
Certified LiveNote Reporter

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1 A. I refuse to answer.

2 Q. And Jeffrey Epstein and/or Ghislaine Maxwell

3 obtained and purchased passports for 15-year-old Jane

4 Doe 102 to transport her to Palm Beach, New York City,

5 Santa Fe, Los Angeles, San Francisco, St. Louis, as

6 well as Europe, the Caribbean, and Africa; are you

7 aware of that?

8 A. I refuse to answer.

9 MR. PIKE: Form.

10 Q. It's also alleged that Jeffrey Epstein in

11 addition to molesting Jane Doe 102 along with Ghislaine

12 Maxwell forced her to have sex with other models,

13 actresses, and celebrities?

14 A. I refuse to answer.

15 MR. PIKE: Form.

16 Q. It also indicates that Jeffrey Epstein

17 transported other minor girls from Turkey, the Czech

18 Republic, Asia, and other countries. Are you aware of

19 that?

20 MR. PIKE: Form.

21 A. I refuse to answer.

22 Q. Is Jeffrey Epstein involved in the

23 international child sex trade?

24 MR. PIKE: Form.

25 A. I refuse to answer.

35

1 Q. Is Jean Luc Brunel his partner in that

2 international child sex trade?

3 MR. PIKE: Form.

4 A. I refuse to answer.

5 Q. Are you aware that after -- that Jeffrey

6 Epstein forced Jane Doe 102 to have sex with other

7 adult male peers including royalty, politicians,

8 academicians, businessmen and/or other professional and

9 personal acquaintances of Jeffrey Epstein's?

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. Is that something that he did with girls other

13 than Jane Doe 102?

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 Q. Aren't you familiar with Jeffrey Epstein's

17 practice of pimping out underage minor females to other

18 people that have the same sexual obsession with

19 underage minors?

20 MR. PIKE: Form.

21 A. I refuse to answer.

22 Q. And doesn't he benefit financially from that

23 sex trade?

24 MR. PIKE: Form.

25 A. I refuse to answer.

36

1 Q. Jane Doe 102 ultimately escaped from him and

2 left to Australia, is that your understanding?

3 A. I refuse to answer.

4 MR. PIKE: Form.

5 Q. Have you ever spoken with Jane Doe 102?

6 A. I refuse to answer.

7 Q. On one of Epstein's birthdays a friend of

8 Jeffrey Epstein sent to him 12 -- three 12-year-old

9 girls from France who spoke no English for Epstein to

10 sexually exploit and abuse and after doing so he sent

11 them back to France the next day. Are you familiar

12 with that?

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 Q. Isn't that something that is fairly common for

16 Mr. Epstein?

17 A. I refuse to answer.

18 MR. PIKE: Form.

19 Q. Who are the friends that send to Jeffrey

20 Epstein underage minor females for his birthday so that

21 he can abuse?

22 A. I refuse to answer.

23 MR. PIKE: Form.

24 Q. Is one of those friends Jean Luc Brunel?

25 A. I refuse to answer.

37

1 Q. Have you ever met Prince Andrew?

2 A. I refuse to answer.

3 Q. Has Prince Andrew been involved with underage

4 minor females to your knowledge?

5 A. I refuse to answer.

6 Q. Have you ever met Alan Dershowitz?

7 A. I refuse to answer.

8 Q. When Alan Dershowitz stays at Jeffrey

9 Epstein's house isn't it true that he has been at the

10 house when underage minor females have been in the

11 bedroom with Jeffrey Epstein?

12 A. I refuse to answer.

13 Q. Has -- are you familiar with the media

14 publication or online resource RadarOnline?

15 A. I refuse to answer.

16 Q. Is that something that you assisted

17 Mr. Epstein with when he purchased RadarOnline?

18 A. I refuse to answer.

19 Q. And do you know his business partner in that

20 endeavor?

21 A. I refuse to answer.

22 Q. Isn't it also true that he used RadarOnline as

23 another way to gain access to underage minor females

24 for sex?

25 MR. PIKE: Form.

78

1 underage minor females staying at those various
 2 condominiums located at 301 East 66th Street?
 3 A. I refuse to answer.
 4 Q. And those females get work visas to say that
 5 they're models, but actually they are prostituted out
 6 by Jeffrey Epstein and John Luc Brunel, correct?
 7 A. I refuse to answer.
 8 MR. PIKE: Form.
 9 Q. And various businessmen and politicians around
 10 New York and Washington, D.C. go to those apartments
 11 frequently to have sex with underage minors; is that
 12 true?
 13 A. I refuse to answer.
 14 Q. Do you remember a flight on December 3rd, 2004
 15 that you took with Jeffrey Epstein, Nadia Marcinkova,
 16 Sarah Kellen, and somebody with initials SH --
 17 A. I refuse to answer.
 18 Q. -- from JFK to PBI?
 19 MR. PIKE: Form.
 20 Q. Do you remember that?
 21 A. I refuse to answer.
 22 Q. Who is SH?
 23 A. I refuse to answer.
 24 Q. Is that an underage minor?
 25 A. I refuse to answer.

79

1 Q. Do you remember a flight that you took
 2 December 27th with Nadia Marcinkova and Jeffrey
 3 Epstein?
 4 A. I refuse to answer.
 5 Q. What airport is this, TIST?
 6 A. I refuse to answer.
 7 Q. Do you know Doug Band?
 8 A. I refuse to answer.
 9 Q. Isn't that Bill Clinton's assistant?
 10 A. I refuse to answer.
 11 Q. You've been on the airplane with him before?
 12 A. I refuse to answer.
 13 Q. Have you been on the airplane with Bill
 14 Clinton before?
 15 A. I refuse to answer.
 16 Q. Who is [REDACTED]?
 17 A. I refuse to answer.
 18 Q. That's somebody you've flown with on Jeffrey
 19 Epstein's plane on numerous occasions, correct?
 20 MR. PIKE: Form.
 21 A. I refuse to answer.
 22 Q. In fact, during the year 2005 you flew on
 23 Jeffrey Epstein's plane would you say more than 50
 24 times?
 25 A. I refuse to answer.

80

1 MR. PIKE: Form.
 2 Q. And you flew to his island, right?
 3 A. I refuse to answer.
 4 MR. PIKE: Form.
 5 Q. You flew to New Mexico?
 6 A. I refuse to answer.
 7 MR. PIKE: Form.
 8 Q. You flew to New Jersey?
 9 MR. PIKE: Form.
 10 A. I refuse to answer.
 11 Q. Several of the flights are just yourself,
 12 Jeffrey Epstein, and Sarah Kellen. What did you do on
 13 those flights?
 14 MR. PIKE: Form.
 15 A. I refuse to answer.
 16 Q. Who's Adam Perrylang?
 17 A. I refuse to answer.
 18 Q. Is that somebody that you were made to have
 19 sex with?
 20 A. I refuse to answer.
 21 Q. Did Jeffrey Epstein ever make you have sex
 22 with any females?
 23 MR. PIKE: Form.
 24 A. I refuse to answer.
 25 Q. Did he ever make you have sex with any of his

81

1 friends?
 2 MR. PIKE: Form.
 3 A. I refuse to answer.
 4 Q. Who is Sandy Berger?
 5 A. I refuse to answer.
 6 Q. That's somebody else that was affiliated with
 7 Bill Clinton at one point in time, correct?
 8 A. I refuse to answer.
 9 Q. A close friend of Jeffrey Epstein's?
 10 MR. PIKE: Form.
 11 A. I refuse to answer.
 12 Q. He called the house within three weeks of the
 13 search warrant being executed. Did he tip off Jeffrey
 14 Epstein?
 15 MR. PIKE: Form.
 16 A. I refuse to answer.
 17 Q. Is he somebody that's involved with underage
 18 minors?
 19 A. I refuse to answer.
 20 Q. Do you know Igor Zinoviev?
 21 A. I refuse to answer.
 22 Q. Andrea Metravich?
 23 A. I refuse to answer.
 24 Q. Have you flown on the airplane with Alan
 25 Dershowitz before?

82

1 MR. PIKE: Form.
 2 A. I refuse to answer.
 3 Q. And Jean Luc Brunel is somebody who you have
 4 been on the airplane with several times, correct?
 5 A. I refuse to answer.
 6 MR. PIKE: Form.
 7 Q. And when Jean Luc Brunel is on this airplane
 8 there are underage minor -- minor females on the
 9 airplane with you, correct?
 10 MR. PIKE: Form.
 11 A. I refuse to answer.
 12 Q. Is there a back room to this airplane? Is
 13 there any sort of separation or is it all one big room?
 14 MR. PIKE: Form.
 15 A. I refuse to answer.
 16 Q. So if Jeffrey Epstein and Jean Luc Brunel are
 17 engaged in sex acts with underage minors did you --
 18 A. I refuse --
 19 Q. Sorry -- did you observe any of those acts?
 20 A. I refuse to answer.
 21 MR. PIKE: Form.
 22 Q. And on numerous of the flights the flight logs
 23 indicate someone's name then oftentimes initials, but
 24 sometimes it would just say "three females". Do you
 25 know why?

83

1 A. I refuse to answer.
 2 MR. PIKE: Form.
 3 Q. Who's Claire Hazel?
 4 A. I refuse to answer.
 5 Q. Do you know Jo-Jo and Lynn Fontanella?
 6 A. I refuse to answer.
 7 Q. They're the house managers up at the mansion
 8 up in Manhattan, correct?
 9 MR. PIKE: Form.
 10 A. I refuse to answer.
 11 Q. And they assist Mr. Epstein in engaging in
 12 underage sex with minors in New York, correct?
 13 MR. PIKE: Form.
 14 A. I refuse to answer.
 15 Q. They also maintain a pretty close relationship
 16 with the police?
 17 A. I refuse to answer.
 18 Q. And that's a big component also, right, that
 19 Jeffrey Epstein has -- is friendly with the law
 20 enforcement, correct?
 21 MR. PIKE: Form.
 22 A. I refuse to answer.
 23 Q. Like law enforcement would do favors for not
 24 only Jeffrey Epstein but his various assistants. If
 25 you were speeding around the neighborhood they wouldn't

84

1 give you a ticket, correct?
 2 MR. PIKE: Form.
 3 A. I refuse to answer.
 4 Q. Was it ever your job to call the police
 5 department and ask if any police reports were on file
 6 or anybody complained about the activities at Jeffrey
 7 Epstein's house?
 8 MR. PIKE: Form.
 9 A. I refuse to answer.
 10 Q. Have you ever gone physically to the police
 11 department?
 12 A. I refuse to answer.
 13 Q. Was there a flight where you flew alone with
 14 Jean Luc Brunel?
 15 A. I refuse to answer.
 16 Q. Have you ever flown on the plane with Prince
 17 Andrew?
 18 MR. PIKE: Form.
 19 A. I refuse to answer.
 20 Q. Do you know Zinta Braukis?
 21 A. I refuse to answer.
 22 Q. That's another model that Jeffrey Epstein
 23 knows, correct?
 24 A. I refuse to answer.
 25 MR. PIKE: Form.

85

1 Q. Somebody that he had engaged in sex with when
 2 she was underage?
 3 A. I refuse to answer.
 4 Q. She actually got a modeling contract out of
 5 it?
 6 MR. PIKE: Form.
 7 A. I refuse to answer.
 8 Q. Why does Jean Luc Brunel and Jeffrey Epstein
 9 fly together so often?
 10 MR. PIKE: Form.
 11 A. I refuse to answer.
 12 Q. And why does Ghislaine Maxwell also fly so
 13 often with Jeffrey Epstein and Jean Luc Brunel?
 14 A. I refuse to answer.
 15 MR. PIKE: Form.
 16 Q. Isn't it true that all three of them are
 17 obsessed and addicted to sex with underage minors?
 18 MR. PIKE: Form.
 19 A. I refuse to answer.
 20 MR. PIKE: Brad, how much longer do you have?
 21 MR. EDWARDS: How long? You want to take a
 22 break?
 23 MR. PIKE: Yeah.
 24 MR. EDWARDS: Sure. It's going a lot faster
 25 than I thought it would.