Case 1:15-cv-07433-LAP	Document 1328-44	Filed 01/05/24	Page 1 of 14
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## 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

U.S. Legal Support (561) 835-0220

	54		56
1	A Fifth.	1	Jeffrey Epstein specifically flew to Palm Beach
2	Q Do you know Bill Clinton?	2	for the purposes of engaging in sex acts with
3	A Fifth.	3	Jane Doe?
4	Q You have been on Jeffrey Epstein's	4	MR. YAREMA: Object to the form.
5	airplane with Bill Clinton?	5	A Fifth.
6	MR. YAREMA: Object to the form.	6	Q Generally, isn't it true Jeffrey Epstein
7	A Fifth.	155	
		7	would fly from place to place for the purpose of
8	Q Isn't take true you have been on Jeffrey	8	engaging in sexual activity with minors at his
9	Epstein's airplane with Doug Band, Bill Clinton's	9	destination?
10	righthand man?	10	MR. YAREMA: Object to the form.
11	MR. YAREMA: Object to the form.	11	A Fifth.
12	A Fifth.	12	Q Isn't it true that he employed numerous
13	Q Have you witnessed improper sexual	13	people for the sole purpose of scheduling
14	activity between Jeffrey Epstein and minors,	14	appointments with underage minor females at eac
15	while he was in the presence of Bill Clinton?	15	destination he landed?
16	MR. YAREMA: Object to the form.	16	MR. YAREMA: Object to the form.
17	A Fifth.	17	A Fifth.
18	Q How many times have you ridden on the	18	Q What is Jeffrey Epstein's relationship
19	airplane with Jean Luc Brunel?	19	with Sandy Berger?
20	MR. YAREMA: Object to the form.	20	MR. YAREMA: Object to the form.
21	A Fifth,	21	A Fifth.
22	Q Each time that Jean Luc Brunel visits	22	Q Do you know what Jeffrey Epstein's
23	Jeffrey Epstein's house, does he bring underage	23	relationship is with Alan Dershowitz?
24	minors to Jeffrey Epstein's house to engage in	24	MR. YAREMA: Object to the form.
25	sex with?	25	A Fifth.
	55		5'
1	MR. YAREMA: Object to the form.	1	Q That's somebody who you know to have
2	A Fifth.	2	stayed at Jeffrey Epstein's house on many
3	Q Do you know Glenn Dubin?	3	occasions, correct?
4	A Fifth.	4	MR. YAREMA: Object to the form.
5		5	A Fifth.
6	Q Do you know Aline Weber? A Fifth.	6	Q And also somebody who you know to have
7		7	
	Q Is that somebody that was a sexual abuse	1 2	been at the house when E.W. was in Jeffrey
8	victim at one point in time of Jeffrey Epstein	8	Epstein's bedroom getting sexually abused,
9	and Jean Luc Brunel?	9	correct?
10	MR. YAREMA: Object to the form.	10	MR. YAREMA: Object to the form.
11	A Fifth.	11	A Fifth.
12	Q Between 2002 and 2005 when E.W. was	12	Q Alan Dershowitz is also somebody that
13	abused by Jeffrey Epstein sexually, isn't it true	13	you also know to have been at the house when L.A
14	that Jeffrey Epstein took flights to Palm Beach	14	was being sexually abused in Jeffrey Epstein's
15	for the purposes of sexually abusing E.W.?	15	bedroom, correct?
16	MR. YAREMA: Object to the form.	16	MR. YAREMA: Object to the form.
17	A Fifth.	17	A Fifth.
18	Q And between those same years of 2002 and	18	Q Generally, Alan Dershowitz is familiar
19	2005, isn't it true that Jeffrey Epstein took	19	with Jeffrey Epstein's habit of engaging in
20	airplane flights to Palm Beach from places	20	sexual acts with minors on a daily basis,
	outside of the State, to engage in sexual acts	21	correct?
21			A LO STATISTICAL COLUMN TO CO.
22	with L.M.?	22	MR. YAREMA: Object to the form.
	MR. YAREMA: Object to the form.	22	A Fifth.
22		4	

	5-cv-07433-LAP Document 1328-44   58		60
1	Alan Dershowitz, meaning he continued to sexually	1	Q What was the purpose of that flight?
2	abuse minors despite Alan Dershowitz being a	2	MR. YAREMA: Object to the form.
3	guest in the house?	3	A Fifth.
4	MR, YAREMA: Object to the form.	4	
100	A Fifth.		Q Did you sign a confidentiality agreement
5		5	with Jeffrey Epstein?
6	Q Alan Dershowitz never engaged in any	6	MR. YAREMA: Object to the form.
7	sexual activity with these underage minors; isn't	7	A Fifth.
8	that true?	9	Q When is the last time that you observed
10	MR. YAREMA: Object to the form.  A Fifth.	10	Jeffrey Epstein have sex with a minor?
U.S.		11	MR, YAREMA: Object to the form.  A Fifth.
11	Q Have you been made to have sex with	12	
100	Ghislaine Maxwell?	100	Q Since being on probation, has Jeffrey
13	MR. YAREMA: Object to the form.	13	Epstein been able to, or has he flown to his
14	A Fifth.	14	island?
15	Q Do you know Emmy Taylor?	15	MR. YAREMA: Object to the form.
16	A Fifth.	16	A Fifth.
17	Q Similar to you being Jeffrey Epstein's	17	Q To your knowledge, has Jeffrey Epstein
18	sex slave, is Emmy Taylor, or was Emmy Taylor	18	flown to New York while on probation or communic
19	Ghislaine Maxwell's sex slave?	19	control?
20	MR. YAREMA: Object to the form.	20	MR. YAREMA: Object to the form.
21	A Fifth.	21	A Fifth.
22	Q Ghislaine Maxwell is somebody who you	22	Q Isn't it true that he has flown both to
23	know to be bi-sexual, true?	23	New York and to his island, and you have
24	MR. YAREMA: Object to the form.	24	accompanied him on those trips, since he was on
25	A Fifth.	25	community control?
	59		6.
1	Q You know that Ghislaine Maxwell engaged	1	MR. YAREMA: Object to the form.
2	in sexual acts with underage minor females, true?	2	A Fifth.
3	MR. YAREMA: Object to the form.	3	Q Isn't it also true that Jeffrey Epstein
4	A Fifth.	4	has indicated to you that he will always engage
5	Q This is yet another friend of Jeffrey	5	in sex acts with underage minor females?
6	Epstein's that is into the act of molesting	6	MR. YAREMA: Object to the form.
7	underage minor females, right?	7	A Fifth.
8	MR. YAREMA: Object to the form.	8	Q In fact, that's something that he has
9	A Fifth.	9	told you, that he believes he is entitled to do;
10	Q Now, you are the next participant in	10	isn't that right?
11	that activity, meaning you have been groomed to	11	MR. YAREMA: Object to the form.
12	enjoy and appreciate the acts of sex with	12	A Fifth.
13	underage minors, true?	13	Q Isn't it true that Jeffrey Epstein
14	MR. YAREMA: Object to the form.	14	believes and has told you that if he doesn't
1.4	A Fifth.	15	physically force the underage minor female into
15		16	any act, then he is entitled to engage in sex
100	Q Has Jeffrey Epstein instructed you to		
15	Q Has Jeffrey Epstein instructed you to lie to his Probation Officer in any way?	17	with any underage minor female despite the age?
15 16			with any underage minor female despite the age? MR. YAREMA: Object to the form.
15 16 17	lie to his Probation Officer in any way?	17	~ B. B
15 16 17 18	lie to his Probation Officer in any way?  MR. YAREMA: Object to the form.	17 18	MR. YAREMA: Object to the form.
15 16 17 18 19	lie to his Probation Officer in any way?  MR. YAREMA: Object to the form.  A Fifth.	17 18 19	MR. YAREMA: Object to the form.  A Fifth.
15 16 17 18 19 20	lie to his Probation Officer in any way?  MR. YAREMA: Object to the form.  A Fifth.  Q Mr. Visoski testified that you took a	17 18 19 20	MR. YAREMA: Object to the form.  A. Fifth.  Q. What is the youngest female you have
15 16 17 18 19 20 21	lie to his Probation Officer in any way?  MR. YAREMA: Object to the form.  A Fifth.  Q Mr. Visoski testified that you took a helicopter flight within the last year with	17 18 19 20 21	MR. YAREMA: Object to the form.  A. Fifth.  Q. What is the youngest female you have witnessed or observed Jeffrey Epstein to engage
15 16 17 18 19 20 21	lie to his Probation Officer in any way?  MR. YAREMA: Object to the form.  A Fifth.  Q Mr. Visoski testified that you took a helicopter flight within the last year with Jeffrey Epstein to Miami. Do you remember that	17 18 19 20 21 22	MR. YAREMA: Object to the form. A Fifth. Q What is the youngest female you have witnessed or observed Jeffrey Epstein to engage in sex with?

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA	1 IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA 2 CASE NO. 502008CA028051XXXXMB AB
CASE NO. 08-CIV-80119-MARRA/JOHNSON	LM,
JANE DOE NO. 2, Plaintiff.	Plaintiff,
-vs- VOLUME II OF III JEFFREY EPSTEIN,	5 -vs- VOLUME II OF III
Defendant.	JEFFREY EPSTEIN,
Related cases:	Defendant.
09-80591, 09-80656, 09-80802, 09-81092	9 VIDEOTAPED DEPOSITION OF SARAH KELLEN 11 Wednesday, March 24, 2010 12 10:37 - 6:51 p.m.
VIDEOTAPED DEPOSITION OF	13 14 15 250 Australian Avenue South West Pulm Beach, Florida 33401
10:37 - 6:51 p.m. 250 Australian Avenue South Suite 1500 West Palm Beach, Florida 33401	16 17 18 19 Reported By: Cynthia Hopkins, RPR, FPR 20 Notary Public, State of Florida
Reported By: Cynthia Hopkins, RPR, FPR Notary Public, State of Florida Prose Court Reporting	Prose Court Reporting 21 22 23 24 25
Page 188	Page 19
IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA CASE NO. 502008CA028058XXXXMB AD 3	IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA CASE No.502008CA037319XXXXMB AB
E.W.,	3 B.B.
Plaintiff,	Plaintiff,
VOLUME II OF III	6 -vs- VOLUME II OF III 7 JEFFREY EPSTEIN
JEFFREY EPSTEIN, 7 Defendant,	AND SARAH KELLEN.
9	Defendants.
DEPOSITION OF SAKAH RELLEN  Wednesday March 24, 2010	11 VIDEOTAPED DEPOSITION OF 12 SARAH KELLEN
10:37 - 6:51 p.m.	13 14 Wednesday, March 24, 2010
The same a series of the same	10;37 - 6;51 p.m. 15
6	17 250 Australian Avenue South Suite 1500
8 Reported By: Cynthia Hopkins, RPR, FPR 9 Notary Public, State of Florida	18 West Palm Beach, Florida 33401 19 20 21
0	22 Reported By: Cynthia Hopkins, RPR, FPR 23 Notary Public, State of Florida
d I	Prose Court Reporting Services Job No.: 1484 25

1 (Pages 187 to 190)

	Page 211		Page 213
4	the shape of a penis and vagina. Once again, not	1	THE WITNESS: On the instruction of my
2	necessarily with respect to Mr. Epstein's home, in	2	lawyer, I must invoke my Fifth Amendment right
3	your entire life have you ever seen soap in the	3	BY MR. KUVIN:
4	shape of a penis and vagina?	4	Q. Do you agree that these corporations that
5	A. Not that I recall.	5	I just mentioned were utilized by Jeffrey Epstein in
. 6	Q. Do you ever recall being in Ohio?	6	an attempt to have sexual relationships with
7	MR. RHEINHART: Ever in her life?	7	underage girls?
8	MR. KUVIN: The state, ever in her life.	8	MR. RHEINHART: Objection to the form as
9	BY MR. KUVIN:	9	to compound, and also assumes knowledge of
10	Q. Let's start there, recall being in the	10	Mr. Epstein, asks for more than one answer to
11	State of Ohio for any reason?	11	the question. I would instruct her not to
12	A. Maybe for a layover, but not that I	12	answer based on her Fifth Amendment privilege
13	specifically remember.	13	because the question assumes knowledge of
14	Q. Okay. Do you know an Ivan Robles?	14	Mr. Epstein.
15	A. No.	15	THE WITNESS: Upon instruction of my
16	Q. Have you seen a gentleman by the name of	16	lawyer I must invoke my Fifth Amendment right.
17	Alan Dershowitz at the home of Jeffrey Epstein	17	MR. KUVIN: I think I am done. Hang on
18	before?	18	one second.
19	MR. RHEINHART: Objection to the form.	19	All right. I appreciate it. That's all
20	Standing objection, presumes knowledge of	20	the questions I have at this time. Reserve the
21	Jeffrey Epstein or his home. Instruct the	21	right to ask any follow-up questions if other
22		22	
	witness not to answer.	23	attorneys raise new and different issues by
23	THE WITNESS: On the instruction of my		their questioning.
24	lawyer, I must exercise my Fifth Amendment	24	MR. RHEINHART: Understood.
25	right.	25	MR. KUVIN: Pass the witness at this time.
	Page 212		Page 214
1.	BY MR. KUVIN:	1	Who wants to go? Mr. Horowitz, do you have a
2	Q. Have you ever heard of the El Zorro Ranch	2	microphone?
3	Corporation?	3	MR. HOROWITZ: I do.
ć <u>i</u>	MR, RHEINHART: Instruct the witness not	4	CROSS (SARAH KELLEN)
5	to answer based on her Fifth Amendment	5	BY MR. HOROWITZ:
6	privilege.	6	Q. Ms. Kellen, did you use the telephone
7	THE WITNESS: On the instruction of my	7	number, the at any time between 2001
8	lawyer I must exercise my Fifth Amendment	8	and 2006?
9	right.	9	A. On the advice of my lawyer, I must exercise my
10	BY MR. KUVIN:	10	Fifth Amendment right.
11	Q. Have you ever heard of the New York	11	Q. Did you use the telephone number
12	Strategy Group?	12	between 2001 and 2006 at Jeffrey
13	MR. RHEINHART: Same instruction.	13	
14		14	Epstein's expense?
	THE WITNESS: On the instruction of my		MR. RHEINHART: Objection to the form in
15	lawyer, I must invoke my Fifth Amendment right.	15	that it assumes knowledge of Jeffrey Epstein.
16	BY MR. KUVIN:	16	Standing objection as previously stated with
17	Q. Have you ever heard of the Ghislaine	17	Mr. Kuvin. Instruct the witness not to answer,
18	Corporation?	18	based on her Fifth Amendment right.
19	MR. RHEINHART: Same instruction.	19	THE WITNESS: On the instruction of my
20	THE WITNESS: On the instruction of my	20	lawyer, I must exercise my Fifth Amendment
21	lawyer, I must invoke my Fifth Amendment right.	21	right.
22	BY MR. KUVIN:	22	BY MR. HOROWITZ:
23	Q. Have you ever heard of the Financial	23	Q. Did you use the telephone number
24	Strategy Group?	24	at Jeffrey Epstein's direction?
25	MR. RHEINHART: Same instruction.	25	MR. RHEINHART: Same objection as the

	Page 315	*	Page 317
1	So can we focus on the specific questions	1	THE WITNESS: On the instruction of my
2	that she can answer or from which you can draw	2	lawyer, I must invoke my Fifth Amendment
3	an adverse inference if asked properly, and	3	privilege.
4	let's move it along.	4	BY MR. WEISSING:
5	MS. EZELL: Each young woman's case is an	5	Q. Do you know Alan Dershowitz?
6	individual case, and we have the right to ask,	6	MR. RHEINHART: The question was asked and
7	ask whatever questions that we need to with	7	answered about three-and-a-half hours ago.
8	regard to each one.	8	THE WITNESS: On the instruction of my
9	MR. RHEINHART: 1	9	lawyer, I must invoke my Fifth Amendment
10	MR. GOLDBERGER: Let's just go forward	10	privilege.
11	until 5:00 and see where we're at.	1.1	BY MR. WEISSING:
12	BY MR. WEISSING:	12	Q. Do you know David Copperfield?
13	Q. Did you know that Jeffrey Epstein received	13	MR. RHEINHART: That question was asked
14	sexual gratification from directing others to	14	about three-and-a-half-hours ago.
15	sexually abuse minor children?	15	THE WITNESS: On the instruction of my
1.6	MR. RHEINHART: Objection to the form.	16	lawyer, I must invoke my Fifth Amendment
17	THE WITNESS: On the instruction of my	17	privilege.
18	lawyer, I must invoke the Fifth Amendment	18	BY MR. WEISSING:
19	rigit.	19	Q. In addition to his place at, in Palm
20	BY MR. WEISSING:	20	Beach, are you aware that Jeffrey Epstein has an
21	Q. Did you know that Jeffrey Epstein received	21	apartment located at 301 East 66th Street, Apartment
22	sexual gratification from directing Marcinkova to	22	14G through E in New York?
23	sexually abuse minor children?	23	MR. RHEINHART: That question was asked
24	MR. RHEINHART: Objection to the form, It	24	about four hours ago. It's been asked and
25	assumes knowledge of a person named Marcinkova.	25	answered.
<i>E- V</i>	The state of the s		Annual control
	Fage 316		Page 318
1	It is otherwise compound and objectionable.	1	THE WITNESS: At the instruction of my
2	THE WITNESS: On the instruction of my	2	lawyer, I invoke my Fifth Amendment privilege.
3	lawyer, I must invoke my Fifth Amendment right.	3	BY MR. WEISSING:
4	MR. WEISSING: Let's go off the record for	4	Q. While in New York, have you procured
5	a moment.	5	underage minor children to engage in sexual acts
6	THE VIDEOGRAPHER: Are we all good with	6	with Jeffrey Epstein at that location?
17	going off the record?	7	MR. RHEINHART: Object to the form.
8	MR. RHEINHART: Yeah, that's fine.	8	THE WITNESS: On the instruction of my
9	MR. HOROWITZ: Yes.	9	lawyer, I must invoke my Fifth Amendment
10	THE VIDEOGRAPHER: We're now off the	10	privilege.
11	record at 4:22 p.m.	11	BY MR. WEISSING:
12	(A brief recess was held.)	12	Q. With regard to the minor children procured
1.3	THE VIDEOGRAPHER: We are now on the	13	for him at that location, were they school children
14	record. It is 4:24 p.m.	14	in the New York area?
13	BY MR. WEISSING:	15	MR. RHEINHART: The previous question,
16	Q. Do you know Nadia Marcinkova?	16	objection to the form. The same as all the
17	MR. KUVIN: Marcinkova.	17	previous questions, it assumes a fact that's
18	THE WITNESS: On the instruction of my	18	not been established. It can't fairly be
19	lawyer, I must invoke my Fifth Amendment	19	answered.
20	privilege.	20	THE WITNESS: On the instruction of my
21	BY MR. WEISSING:	21	lawyer, I must invoke my Fifth Amendment
22		22	
	Q. Do you know - have you procured minor	23	privilege.
23	children to have sexual relations with		BY MR. WEISSING:
24	Nadia Marcinkova at Jeffrey Epstein's mansion?	24	Q. Did Jeffrey Epstein have sexual encounters
25	MR. RHEINHART: Objection to the form.	25	with underage people while at that apartment?

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE NO. 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2.

Plaintiff,

-vs-

VOLUME III 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: Rachel W. Bridge, RPR, FPR Notary Public, State of Florida Prose Court Reporting Services Job No.: 1484

	Page 433		Page 435
1	know what the Edge Group was, but whatever, you can	1	BY MS. EZELL:
2	answer the question.	2	Q. Do you want to respond? I didn't give you
3	THE WITNESS: At the instruction of my lawyer,	3	time.
4	I must choose to invoke my Fifth Amendment right.	4	MR. REINHART: I've instructed her not to
5	BY MS. EZELL:	5	answer the question. Let's move on.
6	Q. Do you know Max Brockman?	6	BY MS, EZELL:
7	MR. REINHART: I'm sorry, can you repeat?	7	Q. Do you recall a dinner at El Brillo Way
8	BY MS. EZELL:	8	attended by David Copperfield where Jane No. 103 was
9	Q. Do you know a Max Brockman?	9	guest?
10	MR. REINHART: I believe that was asked and	10	MR. REINHART: Objection to the form, lack of
11	answered already, but	11	foundation, and a standing objection as to her
12	THE WITNESS: At the instruction of my lawyer,	12	knowledge of anything involving El Brillo Way or
13	I must invoke my Fifth Amendment right.	13	Jeffrey Epstein. Instruct her not to answer.
14	BY MS, EZELL;	14	THE WITNESS: At the instruction of my lawyer,
15	Q. Have you ever been photographed with Max	15	I must invoke my Fifth Amendment right.
16	Brockman at an Edge Science dinner?	16	BY MS. EZELL:
17	A. At the instruction of my lawyer, I must invoke	17	Q. What is the relationship between Jeffrey
18	my Fifth Amendment right.	18	Epstein and David Copperfield?
19	MR. REINHART: You should let me - I need to	19	MR. REINHART: Objection to form, lack of
20	object to the form of the question first, but go	20	foundation as to her knowledge of either one of
21	ahead. I know we all want to get out of here. Go	21	those people. Instruct her not to answer.
22	ahead.	22	THE WITNESS: At the instruction of my lawyer
23	THE WITNESS: Say it again.	23	I must invoke my Fifth Amendment right.
24	MR. REINHART: No, you are okay. Go ahead,	24	BY MS. EZELL:
25	Ms. Ezell. Thank you.	25	Q. To your knowledge, do they recruit girls for
	Page 434		Page 436
1	BY MS. EZELL:		
		1	one another?
			one another?  MR. REINHART: Object to the form, compound
2	Q. Do you know whether Jeffrey Epstein attended	2	MR. REINHART: Object to the form, compound
2	Q. Do you know whether Jeffrey Epstein attended the Edge Science dinner in Monterey, California?		
3 4	Q. Do you know whether Jeffrey Epstein attended	2	MR. REINHART: Object to the form, compound and again, lack of foundation. Instruct her not to answer.
2	Q. Do you know whether Jeffrey Epstein attended the Edge Science dinner in Monterey, California?  MR. REINHART: Objection to the form, lack of foundation. Instruct the witness not to answer.	3	MR. REINHART: Object to the form, compound and again, lack of foundation. Instruct her not to answer. THE WITNESS: At the instruction of my lawye
2 3 4 5	Q. Do you know whether Jeffrey Epstein attended the Edge Science dinner in Monterey, California?  MR. REINHART: Objection to the form, lack of foundation. Instruct the witness not to answer.  THE WITNESS: At the instruction of my lawyer,	2 3 4 5	MR. REINHART: Object to the form, compound and again, lack of foundation. Instruct her not to answer.
2 3 4 5 6 7	Q. Do you know whether Jeffrey Epstein attended the Edge Science dinner in Monterey, California?  MR. REINHART: Objection to the form, lack of foundation. Instruct the witness not to answer.	2 3 4 5	MR. REINHART: Object to the form, compound and again, lack of foundation. Instruct her not to answer.  THE WITNESS: At the instruction of my lawyer I must invoke my Fifth Amendment right.  BY MS. EZELL:
3 4 5	Q. Do you know whether Jeffrey Epstein attended the Edge Science dinner in Monterey, California?  MR. REINHART: Objection to the form, lack of foundation. Instruct the witness not to answer.  THE WITNESS: At the instruction of my lawyer, I must invoke my Fifth Amendment right.	2 3 4 5 6 7	MR. REINHART: Object to the form, compound and again, lack of foundation. Instruct her not to answer. THE WITNESS: At the instruction of my lawyer I must invoke my Fifth Amendment right.
2 3 4 5 6 7 8	Q. Do you know whether Jeffrey Epstein attended the Edge Science dinner in Monterey, California?  MR. REINHART: Objection to the form, lack of foundation. Instruct the witness not to answer.  THE WITNESS: At the instruction of my lawyer, 1 must invoke my Fifth Amendment right.  BY MS. EZELL:	2 3 4 5 6 7 8	MR. REINHART: Object to the form, compound and again, lack of foundation. Instruct her not to answer.  THE WITNESS: At the instruction of my lawyer I must invoke my Fifth Amendment right.  BY MS. EZELL:  Q. To your knowledge, are they involved in any
23456789	Q. Do you know whether Jeffrey Epstein attended the Edge Science dinner in Monterey, California?  MR. REINHART: Objection to the form, lack of foundation. Instruct the witness not to answer.  THE WITNESS: At the instruction of my lawyer, I must invoke my Fifth Amendment right.  BY MS. EZELL:  Q. You testified a moment ago that you were	2 3 4 5 6 7 8 9	MR. REINHART: Object to the form, compound and again, lack of foundation. Instruct her not to answer.  THE WITNESS: At the instruction of my lawyer I must invoke my Fifth Amendment right.  BY MS. EZELL:  Q. To your knowledge, are they involved in any sexual trafficking of young women?
2 3 4 5 6 7 8 9 10 11	Q. Do you know whether Jeffrey Epstein attended the Edge Science dinner in Monterey, California?  MR. REINHART: Objection to the form, lack of foundation. Instruct the witness not to answer.  THE WITNESS: At the instruction of my lawyer, I must invoke my Fifth Amendment right.  BY MS. EZELL:  Q. You testified a moment ago that you were photographed nude by your boyfriend or a former	2 3 4 5 6 7 8 9	MR. REINHART: Object to the form, compound and again, lack of foundation. Instruct her not to answer.  THE WITNESS: At the instruction of my lawyer I must invoke my Fifth Amendment right.  BY MS. EZELL:  Q. To your knowledge, are they involved in any sexual trafficking of young women?  MR. REINHART: Object to the form for the
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18 (Pages 433 to 436)

	Page 437		Page 439
1	Allen Dershowitz and Jeffrey Epstein?	1	BY MS. EZELL:
2	MR. REINHART: And for the third time, I'll	2	Q. Do you know that when David Copperfield is in
3	object to the form and instruct her not to answer	3	town, he gives Jeffrey Epstein tickets and Jeffrey gives
4	the question.	4	some to young women to attend those shows?
5	THE WITNESS: For the third time, I take the	5	MR. REINHART: Object to the form, multiple,
6	advice of my lawyer and invoke my Fifth Amendment	6	compound question, and a complete lack of
7	right.	7	foundation. Instruct the witness not to answer.
8	BY MS, EZELL:	8	THE WITNESS: At the instruction of my lawyer,
9	Q. When Allen Dershowitz comes to Palm Beach, he	9	I must invoke my Fifth Amendment right.
10	stays at the El Brillo mansion, doesn't he?	10	BY MS, EZELL:
11	MR. REINHART: Objection to the form. There	11	Q. And do you know that those girls are invited
12	is no foundation for her having any knowledge of	12	back stage after the show?
13	anything having to do with a person by the name of	13	MR. REINHART: Same objection, complete lack
14	Allen Dershowitz. I instruct her not to answer.	14	of foundation, and standing objection previously
15	THE WITNESS: At the instruction of my lawyer,	15	stated.
16	I must invoke my Fifth Amendment right.	15	THE WITNESS: At the instruction of my lawyer,
17	BY MS. EZELL:	17	I must invoke my Fifth Amendment right.
18	Q. When Allen Dershowitz, or has Allen Dershowitz	18	BY MS. EZELL:
19	씨는 이상이 - 이번 등은 위에서 40년이 이번 이번 시간에서 마시아 아름다면 하는데 생각하다면 되었다. 하는데 영화 -	19	
20	ever been there when young ladies came to give massages?		Q. Do you remember on or about, in or about March
	MR. REINHART: Same objection stated to the	20	of 2005 having conversations with one of the young wome
21	previous question. Same instruction.	21	who came to the house to give massages about her
22	THE WIFNESS: At the instruction of my lawyer,	22	conversations with Jane No. 1037
23	I must invoke my Fifth Amendment right.	23	MR. REINHART: Objection to the form, standing
24	BY MS. EZELL:	24	objection, lack of foundation. Instruct the
25	Q. Has Allen Dershowitz ever been the beneficiary	25	witness not to answer, because the question implies
	Page 438		Page 440
1		1	Page 440 that she has any knowledge at all of El Brillo Way.
1 2	of those massages?	1 2	
1 2 3			that she has any knowledge at all of El Brillo Way.
3	of those massages?  MR, REINHART: Same objection and same instruction.	2	that she has any knowledge at all of El Brillo Way.  BY MS. EZELL:  Q. Same question sorry.
3	of those massages?  MR. REINHART: Same objection and same instruction.  THE WITNESS: At the instruction of my lawyer,	2 3	that she has any knowledge at all of El Brillo Way. BY MS. EZELL: Q. Same question sorry. A. At the instruction of my lawyer, I must choose
3 4 5	of those massages?  MR. REINHART: Same objection and same instruction.  THE WITNESS: At the instruction of my lawyer, I must invoke my Fifth Amendment right.	2 3 4	that she has any knowledge at all of El Brillo Way. BY MS. EZELL: Q. Same question sorry. A. At the instruction of my lawyer, I must choose to have my Fifth Amendment privilege.
2 3 4 5 5	of those massages?  MR. REINHART: Same objection and same instruction.  THE WITNESS: At the instruction of my lawyer, I must invoke my Fifth Amendment right.  BY MS. EZELL:	2 3 4 5	that she has any knowledge at all of El Brillo Way. BY MS. EZELL: Q. Same question sorry. A. At the instruction of my lawyer, I must choose to invoke my Fifth Amendment privilege. Q. Same question as to March of 2006.
234557	of those massages?  MR. REINHART: Same objection and same instruction.  THE WITNESS: At the instruction of my lawyer, I must invoke my Fifth Amendment right.  BY MS. EZELL:  Q. Do you know John Casablanca?	2 3 4 5 7	that she has any knowledge at all of El Brillo Way. BY MS. EZELL: Q. Same question sorry. A. At the instruction of my lawyer, I must choose to invoke my Fifth Amendment privilege. Q. Same question as to March of 2006. MR. REINHART: Same objection and same
2345578	of those massages?  MR. REINHART: Same objection and same instruction.  THE WITNESS: At the instruction of my lawyer, I must invoke my Fifth Amendment right.  BY MS. EZELL:  Q. Do you know John Casablanca?  A. Never heard that name before.	2 4 5 7 8	that she has any knowledge at all of El Brillo Way. BY MS. EZELL: Q. Same question — sorry. A. At the instruction of my lawyer, I must choose to invoke my Fifth Amendment privilege. Q. Same question as to March of 2006. MR. REINHART: Same objection and same instruction.
23455789	of those massages?  MR. REINHART: Same objection and same instruction.  THE WITNESS: At the instruction of my lawyer, I must invoke my Fifth Amendment right.  BY MS. EZELL:  Q. Do you know John Casablanca?  A. Never heard that name before.  Q. Have you ever heard of a world-famous	N 4 13 5 7 80 9	that she has any knowledge at all of El Brillo Way. BY MS. EZELL: Q. Same question sorry. A. At the instruction of my lawyer, I must choose to have my Fifth Amendment privilege. Q. Same question as to March of 2006. MR. REINHART: Same objection and same instruction. THE WITNESS: At the instruction of my lawyer.
2 3 4 5 7 8 9	of those massages?  MR. REINHART: Same objection and same instruction.  THE WITNESS: At the instruction of my lawyer, I must invoke my Fifth Amendment right.  BY MS. EZELL:  Q. Do you know John Casablanca?  A. Never heard that name before.  Q. Have you ever heard of a world-famous illusionist whose stage name is David Copperfield?	2 3 4 5 7 8 9 10	that she has any knowledge at all of El Brillo Way. BY MS. EZELL: Q. Same question sorry. A. At the instruction of my lawyer, I must choose to invoke my Fifth Amendment privilege. Q. Same question as to March of 2006. MR. REINHART: Same objection and same instruction. THE WITNESS: At the instruction of my lawyer I must choose to invoke my Fifth Amendment
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2 3 4 5 7 8 9 10 11 12 13 14 15	of those massages?  MR. REINHART: Same objection and same instruction.  THE WITNESS: At the instruction of my lawyer, I must invoke my Fifth Amendment right.  BY MS. EZELL:  Q. Do you know John Casablanca?  A. Never heard that name before.  Q. Have you ever heard of a world-famous illusionist whose stage name is David Copperfield?  MR. REINHART: That's also been asked at least three times. I'll instruct her again not to answer the question.  THE WITNESS: At the instruction of my lawyer, I must invoke my Fifth Amendment right.	2 3 4 5 7 8 9 10 11 12 13 14 15	that she has any knowledge at all of El Brillo Way. BY MS. EZELL: Q. Same question sorry. A. At the instruction of my lawyer, I must choose to invoke my Fifth Amendment privilege. Q. Same question as to March of 2006. MR. REINHART: Same objection and same instruction. THE WITNESS: At the instruction of my lawyer I must choose to invoke my Fifth Amendment privilege. BY MS. EZELL: Q. Do you have any recollection of a conversation in which one of the young women told Jane No. 103 that those girls who, those girls who would help Jeffrey in
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19 (Pages 437 to 440)

## 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

	34 .		36
1	A. I refuse to answer.	T.	Q. Jane Doc 102 ultimately escaped from him and
2	Q. And Jeffrey Epstein and/or Ghislaine Maxwell	2	left to Australia, is that your understanding?
3	obtained and purchased passports for 15-year-old Jane	3	A. I refuse to answer.
4	Doe 102 to transport her to Palm Beach, New York City,	4	MR. PIKE: Form.
5	Santa Fe, Los Angeles, San Francisco, St. Louis, as	5	Q. Have you ever spoken with Jane Doe 102?
6	well as Europe, the Caribbean, and Africa; are you	6	A. I refuse to answer.
7	aware of that?	7	Q. On one of Epstein's birthdays a friend of
8	A. I refuse to answer	8	Jeffrey Epstein sent to him 12 three 12-year-old
9	MR. PIKE: Form.	9	girls from France who spoke no English for Epstein to
10	Q. It's also alleged that Jeffrey Epstein in	10	sexually exploit and abuse and after doing so he sent
11	addition to molesting Jane Doe 102 along with Ghislaine	11	them back to France the next day. Are you familiar
12	Maxwell forced her to have sex with other models,	12	with that?
13	actresses, and celebrities?	1.3	MR. PIKE: Form
14	A. I refuse to answer.	14	A. I refuse to answer.
15	MR. PIKE: Porm.	15	Q. Isn't that something that is fairly common for
16	Q. It also indicates that Jeffrey Epstein	16	Mr. Epstein?
17	transported other minor girls from Turkey, the Czech	17	A. I refuse to answer.
18	Republic, Asia, and other countries. Are you aware of	18	MR. PIKE: Form.
19	that?	19	Q. Who are the friends that send to Jeffrey
20	MR. PIKE: Form.	20	Epstein underage minor females for his birthday so that
21	A. I refuse to answer.	21	he can abuse?
22	Q. Is Jeffrey Epstein involved in the	22	A. I refuse to answer.
23	international child sex trade?	23	MR. PIKE: Form.
24	MR. PIKE: Form.	24	Q. Is one of those friends Jean Luc Brunel?
25	A. I refuse to answer.	25	A. I refuse to answer.
			CONTRACTOR OF THE PROPERTY OF
	35	00	37
1	Q. Is Jean Luc Brunel his partner in that	1	Q. Have you ever met Prince Andrew?
2	international child sex trade?	5	A. I refuse to answer.
3	MR. PIKE: Form.	3	Q. Has Prince Andrew been involved with undern
4	A. I refuse to answer,	4	minor females to your knowledge?
5	Q. Are you aware that after - that Jeffrey	5	A. I refuse to answer.
6	Epstein forced Jane Doe 102 to have sex with other	6	Q. Have you ever met Alan Dershowitz?
7	adult male peers including royalty, politicians,	7	A. I refuse to answer.
8	academicians, businessmen and/or other professional and	8	Q. When Alan Dershowitz stays at Jeffrey
9	personal acquaintances of Jeffrey Epstein's?	9	Epstein's house isn't it true that he has been at the
10	MR. PIKE: Form.	1.0	house when underage minor females have been in the
1	A. I refuse to answer.	11	bedroom with Jeffrey Epstein?
12	Q. Is that something that he did with girls other	1.2	A. Trefuse to answer.
13	than Jane Doe 102?	1.3	Q. Has are you familiar with the media
14	MR. PIKE: Fonn.	14	publication or online resource RadarOnline?
15	A. I refuse to unswer.	15	A. I refuse to answer.
16	Q. Arcu't you familiar with Jeffrey Epstein's	16	Q. Is that something that you assisted
17	practice of pimping out underage minor females to other	17	Mr. Epstein with when he purchased RadarOnline?
18	people that have the same sexual obsession with	18	A. I refuse to answer.
19	underage minors?	19	Q. And do you know his business partner in that
20	MR. PIKE: Fonn.	20	endenvor?
21	A. I refuse to answer.	21	A. I refuse to answer.
22	Q. And doesn't he benefit financially from that	5.5	Q. Isn't it also true that he used RadarOnline as
23	sex trade?	23	another way to gain access to underage minor female.
24	MR. PIKE: FORE.	24	for sex?
25	A. I refuse to answer.	25	MR. PIKE: Form.

	78		80
1	underage minor females staying at those various	7	MR. PIKE: Form.
2	condominiums located at 301 East 66th Street?	2	Q. And you flew to his Island, right?
3	A. I refuse to answer.	3	A. I refuse to answer.
4	Q. And those females get work visas to say that	4	MR. PIKE: Form.
5	they're models, but actually they are prostituted out	5	Q. You flew to New Mexico?
6	by Jeffrey Epstein and John Luc Brunel, correct?	6	A. I refuse to answer.
7	A. I refuse to answer.	7	MR. PIKE: Form.
8	MR, PIKE: Form,	3	Q. You flew to New Jersey?
9	Q. And various businessmen and politicians around	9	MR. PIKE: Form.
10	New York and Washington, D.C. go to those apartments	10	A. I refuse to answer.
1.1	frequently to have sex with underage minors; is that	1.1	Q. Several of the flights are just yourself.
12	true?	12	Jeffrey Epstein, and Sorah Kellen. What did you do o
13	A. I refuse to answer.	13	those flights?
14	Q. Do you remember a flight on December 3rd, 2004	14	MR. PIKE: Form.
15	that you took with Jeffrey Epstein, Nadia Marcinkova,	15	A. I refuse to answer.
16	Sarah Kellen, and somebody with initials SH	16	Q. Who's Adam Perrylang?
17	A. 1 refuse to answer.	17	A. 1 refuse to answer.
18	Q from JFK to PBI?	18	Q. Is that somebody that you were made to have
19	MR, PIKE: Form.	19	sex with?
20	Q. Do you remember that?	20	A. I refuse to answer.
21	A. I refuse to answer.	21	Q. Did Jeffrey Epstein ever make you have sex
22	Q. Who is SH?	22	with any females?
23	A. I refuse to answer.	23	MR. PIKE: Form.
24	Q. Is that an underage minor?	24	A. I refuse to answer.
25	A. I refuse to answer.	25	Q. Did he ever make you have sex with any of his
	79	Per 0.0.35015	81
1	Q. Do you remember a flight that you took	1	friends?
2	December 27th with Nadia Marcinkova and Jeffrey	2	MR. PIKE: Form.
3	Epstein?	3	A. I refuse to answer.
4	A. I refuse to answer.	4	Q. Who is Sandy Berger?
5	Q. What airport is this, TIST?	5	A. I refuse to answer.
6	A. I refuse to answer.	6	Q. That's somebody else that was affiliated with
7	Q. Do you know Dong Band?	7	Bill Clinton at one point in time, correct?
8	A. I refuse to answer.	8	A. I refuse to answer.
9	Q. Isn't that Bill Clinton's assistant?	9	Q. A close friend of Jeffrey Epstein's?
10	A. I refuse to answer.	10	MR. PIKE: Form.
11	Q. You've been on the airplane with him before?	11	A. I refuse to answer.
12	A. I refuse to answer.	12	Q. He called the house within three weeks of the
13	Q. Have you been on the airplane with Bill	13	search warrant being executed. Did he tip off Jeffre
14	Clinton before?	14	Epstein?
15	A. I refuse to answer.	15	MR, PIKE: Form.
16	O. Who is 22 ?	16	A. I refuse to answer.
17	A. I refuse to answer.	17	Q. Is he somebody that's involved with underage
18	Q. That's somebody you've flown with on Jeffrey	18	minors?
19	Epstein's plane on numerous occasions, correct?	19	A. I refuse to answer.
20	MR. PIKE: Form.	20	Q. Do you know Igor Zinoviev?
21	A, I refuse to answer.	21	A. I refuse to answer.
22	Q. In fact, during the year 2005 you flew on	22	Q. Andrea Metrovich?
		23	A. I refuse to answer.
	Jeffrey Epstein's plane would you say more than but		
23	Jeffrey Epstein's plane would you say more than 50 times?	24	Q. Have you flown on the airplane with Alan

	82		84
1	MR, PIKE: Form.	1	give you a ticket, correct?
2	A. I refuse to answer.	2	MR. PIKE: Form.
3	Q. And Jean Luc Brunel is somebody who you have	3	A. I refuse to answer.
4	been on the airplane with several times, correct?	4	Q. Was it ever your job to call the police
5	A. I refuse to answer.	5	department and ask if any police reports were on fil
6	MR. PIKE: Form.	6	or anybody complained about the activities at Jeffre
7	Q. And when Jean Luc Brunel is on this airplane	7	Epstein's house?
8	there are underage minor minor females on the	8	MR. PIKE: Form.
9	airplane with you, correct?	9	A. I refuse to answer.
10	MR. PIKE: Form.	10	Q. Have you ever gone physically to the police
11	A. I refuse to answer.	11	department?
12	Q. Is there a back room to this airplane? Is	12	A. I refuse to answer.
13	there any sort of separation or is it all one big room?	13	Q. Was there a flight where you flew alone with
14	MR. PIKE: Form.	14	Jean Luc Brunel?
15	A. I refuse to answer.	15	A. I refuse to answer.
16	Q. So if Jeffrey Epstein and Jean Luc Brunel are	16	Q. Have you ever flown on the plane with Prince
17	engaged in sex acts with underage minors did you -	17	Andrew?
18	A Irefuse -	18	MR. PIKE: Form.
19	Q. Sorry did you observe any of those acts?	19	A. I refuse to answer.
20	A. I refuse to answer.	20	Q. Do you know Zinta Brankis?
21	MR. PIKE: Form.	21	A. I refuse to answer.
22		22	SCHOOL ALTERNATION CONTRACTOR
000.50	Q. And on numerous of the flights the flight logs	23	Q. That's another model that Jeffrey Epstein
23	indicate someone's name then oftentimes initials, but		knows, correct?
24	sometimes it would just say "three females". Do you	24	A. I refuse to answer.
25	know why?	25	MR. PIKE: Form.
	83		88
1	A. I refuse to answer.	1	Q. Somebody that he had engaged in sex with whe
2	MR. PIKE: Form.	2	she was underage?
3	Q. Who's Claire Hazel?	3	A. I refuse to answer.
4	A. I refuse to answer.	4	Q. She actually got a modeling contract out of
5	Q. Do you know Jo-Jo and Lynn Fontanella?	5	it?
6	A. I refuse to answer.	6	
7			MR. PIKE: Form.
.6	Q. They're the house managers up at the mansion	7	MR. PIKE: Form.  A. I refuse to answer.
8	Q. They're the house managers up at the mansion up in Manhattan, correct?	230	A. I refuse to answer.
	The state of the s	7	A. I refuse to answer.
8	up in Manhattan, correct?	7 8	A. I refuse to answer.  Q. Why does Jean Luc Brunel and Jeffrey Epstein
8 9 10	up in Manhattau, correct?  MR. PIKE: Form.	7 8 9	A. I refuse to answer.  Q. Why does Jean Luc Brunel and Jeffrey Epstein fly together so often?
8 9 10 11	up in Manhattan, correct?  MR. PIKE: Form.  A. I refuse to answer.	7 8 9	A. I refuse to answer.  Q. Why does Jean Luc Brunel and Jeffrey Epstein fly together so often?  MR. PIKE: Form.
8 9 10 11	up in Manhattan, correct?  MR. PIKE: Form.  A. I refuse to answer.  Q. And they assist Mr. Epstein in engaging in	7 8 9 10	A. I refuse to answer.  Q. Why does Jean Luc Brunel and Jeffrey Epstein fly together so often?  MR. PIKE: Form.  A. I refuse to answer.
8 9 10 11 12	up in Manhattan, correct?  MR. PIKE: Form.  A. I refuse to answer.  Q. And they assist Mr. Epstein in engaging in underage sex with minors in New York, correct?	7 8 9 10 11	A. I refuse to answer.  Q. Why does Jean Luc Brunel and Jeffrey Epstein fly together so often?  MR. PIKE: Form.  A. I refuse to answer.  Q. And why does Ghislaine Maxwell also fly so
8 9 10 11 12	up in Manhattan, correct?  MR. PIKE: Form.  A. I refuse to answer.  Q. And they assist Mr. Epstein in engaging in underage sex with minors in New York, correct?  MR. PIKE: Form.	7 8 9 10 11 12 13	A. I refuse to answer.  Q. Why does Jean Luc Brunel and Jeffrey Epstein fly together so often?  MR. PIKE: Form.  A. I refuse to answer.  Q. And why does Ghislaine Maxwell also fly so often with Jeffrey Epstein and Jean Luc Brunel?
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8 9 10 11 12 13	up in Manhattan, correct?  MR. PIKE: Form.  A. I refuse to answer.  Q. And they assist Mr. Epstein in engaging in underage sex with minors in New York, correct?  MR. PIKE: Form.  A. I refuse to answer.  Q. They also maintain a pretty close relationship	7 8 9 10 11 12 13 14 15	A. I refuse to answer.  Q. Why does Jean Luc Brunel and Jeffrey Epstein fly together so often?  MR. PIKE: Form.  A. I refuse to answer.  Q. And why does Ghislaine Maxwell also fly so often with Jeffrey Epstein and Jean Luc Brunel?  A. I refuse to answer.  MR. PIKE: Form.
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