

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

GHISLAINE MAXWELL,

Defendant.

_____ /

250 N. Australian Avenue,
Suite 1400
West Palm Beach, Florida 33401
Friday, September 9, 2016
8:35 a.m. - 2:08 p.m.

C O N F I D E N T I A L

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

Taken before Darline M. West,
Registered Professional Reporter, Notary Public
in and for the State of Florida At Large,
pursuant to Notice of Taking Deposition filed
by the Plaintiff in the above cause.

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026

(866) 624-6221

Page 2

1 APPEARANCES:
 2 On behalf of the Plaintiff:
 3 THE UNIVERSITY OF UTAH,
 4 S.J. QUINNEY COLLEGE OF LAW
 5 383 South University Street
 6 Salt Lake City, Utah 84112
 7 Phone: 801.585.5202
 8 E-mail: Cassellp@law.utah.edu
 9 By: PAUL G. CASSELL, ESQ.
 10 -and-
 11 BOIES SCHILLER & FLEXNER, LLP
 12 401 East Las Olas Boulevard
 13 Fort Lauderdale, Florida 33301
 14 Phone: 954.356.0011
 15 E-mail: Smccawley@bsflp.com
 16 By: SIGRID S. MCCAWLEY, ESQ.
 17
 18 On behalf of the Defendant:
 19 HADDON MORGAN FOREMAN
 20 150 East 10th Avenue
 21 Denver, Colorado 80203
 22 Phone: 303.831.7364
 23 E-mail: Jpagliuca@hmflaw.com
 24 By: JEFFREY PAGLIUCA, ESQ.
 25 -and-
 (Appearances continued on the next page)

Page 3

1 APPEARANCES:
 2 MARTIN G. WEINBERG, P.C.
 3 20 Park Plaza, No. 1000
 4 Boston, Massachusetts 02116
 5 Phone: 617.227.3700
 6 E-mail: Marty@martinweinberglaw.com
 7 By: MARTIN G. WEINBERG, P.C.
 8 (Appearing telephonically)
 9
 10 ALSO PRESENT:
 11 RYAN KICK - Video Technician
 12 DARLINE MARIE WEST - Court Stenographer
 13
 14 - - -
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 4

1 INDEX
 2 WITNESS: PAGE:
 3 JEFFREY EDWARD EPSTEIN
 4 DIRECT EXAMINATION 8
 5 BY MR. CASSELL:
 6 CROSS-EXAMINATION 275
 7 BY MR. PAGLIUCA:
 8 REDIRECT EXAMINATION 324
 9 BY MR. CASSELL:
 10 CERTIFICATE OF OATH 375
 11 REPORTER'S CERTIFICATE 376
 12
 13 - - -
 14 EXHIBITS
 15 - - -
 16 Description Page
 17 Plaintiff's Exhibit JE1 Transcript of the 54
 18 deposition of
 19 Ms. Maxwell taken on
 20 April 22nd, 2016
 21 Plaintiff's Exhibit JE2 Document with titles 90
 22 of books
 23 Plaintiff's Exhibit JE3 Photograph depicting 101
 24 Prince Andrew,
 25 Maxwell, and Virginia
 Plaintiff's Exhibit JE4 E-mail that Jeffrey 173
 Epstein sent to
 Maxwell on
 January 12th, 2015

Page 5

1 Plaintiff's Composite E-mail Jeffrey 180
 Exhibit JE5 Epstein received from
 2 Ms. Maxwell on about
 3 July 18th, 2009
 4 Plaintiff's Exhibit JE6 E-mail string between 185
 5 Jeffrey Epstein and
 6 Ms. Maxwell on about
 7 March 25th, 2011
 8 Plaintiff's Exhibit JE7 Transcription of a 189
 9 string of e-mails
 10 between Jeffrey
 11 Epstein and Ms.
 12 Maxwell in about May
 13 of 2011
 14 Plaintiff's Exhibit JE8 E-mail that Jeffrey 191
 15 Epstein sent to
 16 Maxwell on
 17 January 15th, 2015
 18 Plaintiff's Exhibit JE9 Document 361-46 on 210
 19 the public record in
 20 the case Jane Doe
 21 versus United States
 22 908CD80736 in the
 23 Southern District of
 24 Florida, a document
 25 signed by Gerald
 Lefcourt and
 Alan Dershowitz
 Plaintiff's Exhibit Subpoena in this case 225
 JE10 for Jeffrey Epstein
 to appear at
 deposition
 Plaintiff's Exhibit Transcript of Ms. 347
 JE11 Maxwell, taken on
 July 22, 2016

Page 6	Page 8
<p>1 QUESTIONS MARKED BY THE REQUEST OF COUNSEL: 2 3 PAGE/LINES 4 Page 69, lines 24 through 25 5 Page 70, lines 2 through 16 6 (At the request of Mr. Pagliuca) 7 8 Page 280, lines 4 through 6 9 (At the request of Mr. Cassell) 10 11 - - - 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 J. Epstein - Confidential 2 MR. GOLDBERGER: And Jack Goldberger on 3 behalf of the witness, Jeffrey Epstein. 4 And on the phone is? 5 MR. WEINBERG: Martin Weinberg by 6 telephone on behalf of the witness, 7 Jeffrey Epstein. 8 VIDEO TECHNICIAN: Will the court 9 reporter please swear the witness. 10 THE COURT REPORTER: Okay. Sir, could 11 you raise your right hand. 12 Do you swear to tell the truth, the 13 whole truth, and nothing but the truth? 14 THE WITNESS: Yes, ma'am. 15 THEREUPON, 16 JEFFREY EDWARD EPSTEIN, 17 called as a witness on behalf of the Plaintiff 18 herein, having been first duly sworn, was examined 19 and testified as follows: 20 DIRECT EXAMINATION 21 BY MR. CASSELL: 22 Q. All right. Sir, you understand that my 23 client is Ms. Virginia Roberts Giuffre? 24 MR. GOLDBERGER: I'm sorry, 25 Mr. Cassell. Before we start, let -- let me</p>
Page 7	Page 9
<p>1 J. Epstein - Confidential 2 P R O C E E D I N G S 3 - - - 4 VIDEO TECHNICIAN: We are now on the 5 record. This begins videotape No. 1 in the 6 deposition of Jeffrey Epstein in the matter 7 of Giuffre versus Maxwell. 8 Today is September 9th, 2016. The time 9 is 8:35 a.m. This deposition is being taken 10 at 250 North Australian Avenue, West Palm 11 Beach, Florida. The videographer is 12 Ryan Kick. The court reporter is 13 Darline West. We both represent Magna Legal 14 Services. 15 Will counsel and all parties present 16 state their appearance and whom they 17 represent. 18 MR. CASSELL: I can begin. My name's 19 Paul Cassell, and I represent Miss Virginia 20 Giuffre. 21 MS. MCCAWLEY: Sigrid McCawley with 22 Boies, Schiller & Flexner on behalf of 23 Virginia Giuffre. 24 MR. PAGLIUCA: Jeff Pagliuca appearing 25 on behalf Gwen Maxwell.</p>	<p>1 J. Epstein - Confidential 2 just discuss something on the record. 3 I understand there's a protective order 4 in place on this case concerning 5 confidentiality in this depositions. And as 6 I understand the protective order, either 7 party can designate the -- the proceeding as 8 confidential, and I understand counsel for 9 Miss Maxwell is going to do that in this 10 case. 11 MR. PAGLIUCA: That's correct. I'm 12 designating this deposition as confidential. 13 Any other stips? 14 MR. GOLDBERGER: Huh? 15 MR. PAGLIUCA: Any other stips? 16 MR. GOLDBERGER: No. We're good for 17 now. 18 MR. PAGLIUCA: Okay. 19 BY MR. CASSELL: 20 Q. All right. Sir, you understand I'm an 21 attorney representing Miss Roberts -- Virginia 22 Roberts Giuffre? 23 A. I've been advised by my counsel to assert 24 my rights under the Fifth Amendment of the United 25 States Constitution as to any and all questions that</p>

Page 10

1 J. Epstein - Confidential
 2 could result in a waiver of my Constitutional
 3 privileges. I understand that one of the basic
 4 functions of the Fifth Amendment, according to the
 5 United States Supreme Court, is to protect all
 6 citizens, including even innocent persons who
 7 otherwise might be ensnared by ambiguous
 8 circumstances. On the advice of counsel, I assert my
 9 rights under the Fifth Amendment and respectfully
 10 decline to answer your question.
 11 MR. CASSELL: Mr. Goldberger, it's your
 12 position that having him acknowledge who my
 13 client is creates a realistic risk of
 14 incrimination?
 15 MR. GOLDBERGER: We're not going to
 16 debate at this deposition whether the
 17 implication of the Fifth Amendment privilege
 18 is proper or not proper. We are simply
 19 asserting the privilege. And if that needs
 20 to be discussed or litigated somewhere else,
 21 we'll be happy to do so, so...
 22 BY MR. CASSELL:
 23 Q. If I refer to Virginia today, I want you to
 24 understand that I'll be referring to my client,
 25 Miss Virginia Roberts Giuffre.

Page 11

1 J. Epstein - Confidential
 2 Is that an acceptable way to proceed today,
 3 sir?
 4 A. As I stated before in response to my -- to
 5 your earlier question, I am asserting my
 6 constitutional right not to respond to that question.
 7 MR. GOLDBERGER: This would be a good
 8 opportunity, I think, to kind of discuss
 9 ground rules for the implication of the
 10 Fifth Amendment --
 11 MR. CASSELL: All right.
 12 MR. GOLDBERGER: -- as we proceed in
 13 this deposition. We've advised you off the
 14 record and it's not any surprise to anyone
 15 that Mr. Epstein fully intends to invoke
 16 Fifth Amendment privileges to all of your
 17 questions.
 18 We can -- as we answer your questions,
 19 and we'll be happy to answer all your
 20 questions, we can use the full invocation
 21 that we did in response to your first
 22 question, we can use the invocation that we
 23 just did in response to your second
 24 question, or we simply can say, Fifth
 25 Amendment, with the understanding that the

Page 12

1 J. Epstein - Confidential
 2 answer would be edited and -- and would be
 3 the full answer that Mr. Epstein gave to the
 4 first question. Really, your choice on that
 5 as to how you would like to proceed.
 6 MR. CASSELL: Yeah. Whatever you think
 7 would be the fastest. I want to get through
 8 this.
 9 MR. GOLDBERGER: Okay.
 10 MR. CASSELL: And so, obviously, we'll
 11 be objecting to many of these invocations
 12 already.
 13 MR. GOLDBERGER: Sure.
 14 MR. CASSELL: I think that these are
 15 improper invocations, but if we're going to
 16 litigate that elsewhere, that certainly is
 17 one way to proceed.
 18 MR. GOLDBERGER: Okay. So is it fair
 19 to say we've reached an agreement that if
 20 Mr. Epstein simply says, the Fifth, the
 21 answer that would be part of the record for
 22 any time these proceedings are used anywhere
 23 would be the full invocation Mr. Epstein
 24 used in answer to the first question?
 25 MR. CASSELL: Yes. And I would at the

Page 13

1 J. Epstein - Confidential
 2 -- I would then raise an objection to the
 3 nonresponsive portion of the invocation,
 4 such as, for example, a reference to
 5 "innocent persons." It seems to me that's
 6 not necessary for him to take the Fifth.
 7 MR. GOLDBERGER: Okay.
 8 MR. CASSELL: As long as we have your
 9 position and our position both stated all
 10 the time, that -- that seems like the most
 11 expeditious way to proceed.
 12 MR. WEINBERG: One other matter, a
 13 preliminary matter, which is that we would
 14 reserve our right to particularize a full
 15 basis based on the record of this case, the
 16 record of the CVARC -- CVRA case,
 17 representations that have been made by you
 18 and Mr. Edwards regarding Mr. Epstein and
 19 his potential criminal liability and your
 20 intention to seek to rescind his
 21 non-prosecution agreement, the admissions
 22 taken on the absence of the meaningful
 23 Statute of Limitations, in terms of our
 24 spelling out, if the Fifth Amendment is
 25 challenged in regards to any response by

Page 14

1 J. Epstein - Confidential
 2 Mr. Epstein, for instance, a response to
 3 whether he even recognizes the name of your
 4 client, in the event you choose to challenge
 5 the essential applicability of the
 6 long-standing Fifth Amendment privilege.
 7 MR. CASSELL: I'm going to object to
 8 Mr. Weinberg defending the deposition in
 9 addition to Mr. Goldberg. My
 10 understanding of the rules --
 11 MR. GOLDBERGER: Goldberger. It's
 12 Goldberger.
 13 MR. CASSELL: I'm sorry. I apologize.
 14 Mr. Goldberger.
 15 It seems to me, the standard is one
 16 lawyer for one witness. And Mr. Goldberger
 17 is a very capable lawyer, so it seems to me
 18 Mr. Weinberg should not be allowed to
 19 participate by making objections.
 20 MR. PAGLIUCA: And for the record, I
 21 have no objection to Mr. Epstein simply
 22 saying, Fifth Amendment in response to any
 23 questions and understand that that answer
 24 would incorporate all of the first answer
 25 that Mr. Epstein gave in this deposition.

Page 15

1 J. Epstein - Confidential
 2 MR. GOLDBERGER: Thank you.
 3 BY MR. CASSELL:
 4 Q. Sir, you've been deposed many times before,
 5 true?
 6 A. Fifth.
 7 Q. You understand the rules regarding the
 8 deposition today, true?
 9 A. Fifth.
 10 Q. You have legal counsel here today to
 11 provide advice to you, should it be necessary at any
 12 point, true?
 13 A. True.
 14 Q. Is there anything, including any physical
 15 conditions or ailments, that would prevent you from
 16 giving truthful testimony today?
 17 A. Fifth.
 18 Q. Please state your full name.
 19 A. Jeffrey Edward Epstein.
 20 Q. Without disclosing where you may have lived
 21 in the past, where do you currently reside?
 22 A. Fifth.
 23 Q. What state are you a citizen of?
 24 A. Can you clarify the question?
 25 Q. Yeah. What state do you consider yourself

Page 16

1 J. Epstein - Confidential
 2 to be a citizen of?
 3 A. Fifth.
 4 Q. You understand that the case caption on the
 5 subpoena you received is Virginia Giuffre versus
 6 Ghislaine Maxwell?
 7 A. Fifth.
 8 Q. You know the Defendant in this case,
 9 Ghislaine Maxwell, true?
 10 A. Fifth.
 11 Q. You first met Maxwell in the early 1990s;
 12 isn't that true?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 MR. CASSELL: Let me make sure I
 17 understand.
 18 What's the objection to form?
 19 MR. PAGLIUCA: The question is vague.
 20 BY MR. CASSELL:
 21 Q. When did you first meet Ms. Maxwell?
 22 A. Fifth.
 23 Q. Where did you first meet Ms. Maxwell?
 24 A. Fifth.
 25 Q. What were the circumstances surrounding

Page 17

1 J. Epstein - Confidential
 2 your first meeting of Maxwell?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Could you repeat the
 6 question?
 7 BY MR. CASSELL:
 8 Q. What were the circumstances surrounding
 9 your first meeting of Maxwell?
 10 MR. PAGLIUCA: Same objection.
 11 THE WITNESS: Fifth.
 12 MR. CASSELL: And when you say "form," you
 13 believe that the question that I just asked is
 14 vague?
 15 MR. PAGLIUCA: It is vague. I don't
 16 understand what "circumstances" means. It
 17 lacks foundation, in that there hasn't been
 18 an establishment of any time or place of
 19 meeting of Ms. Maxwell or even that he knows
 20 Ms. Maxwell under the circumstances of this
 21 deposition.
 22 MR. CASSELL: Right. But you
 23 understand there is evidence in the record
 24 from which I would have a good faith basis
 25 for believing that he has, in fact, met

Page 18

1 J. Epstein - Confidential
 2 Ms. Maxwell?
 3 MR. PAGLIUCA: I'm not going to debate
 4 what you have a good faith for believing or
 5 not. My -- my objection stands.
 6 MR. CASSELL: I'm just confused about
 7 how there could be a lack of foundation for
 8 whether they have met, when your client
 9 testified under oath that she had interacted
 10 with Epstein repeatedly.
 11 MR. PAGLIUCA: That's my objection.
 12 MR. CASSELL: All right.
 13 BY MR. CASSELL:
 14 Q. Just so we're clear, the -- the question --
 15 let me just -- I may have asked this before, but I
 16 want to make sure we haven't messed -- messed --
 17 missed anything.
 18 What were the circumstances surrounding
 19 your first meeting with Maxwell?
 20 MR. PAGLIUCA: Same objection. Form
 21 and foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. And whenever I use the term "Maxwell"
 25 today, I wanted it to be clear that I'm referring to

Page 19

1 J. Epstein - Confidential
 2 the Defendant in this action, Ghislaine Maxwell.
 3 Would you consider yourself currently to be
 4 the boyfriend of Ms. Maxwell?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Have you ever been a boyfriend of
 10 Ms. Maxwell?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. It's true that at some point you had an
 16 intimate relationship with Miss Maxwell?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. You were in a long-term relationship with
 22 Maxwell from the early '90s through -- through at
 23 least 2005, true?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 20

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. How long did your long-term relationship
 5 with Maxwell continue?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. You are currently in a relationship with
 11 Maxwell, true?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. You currently have a joint defense
 17 agreement with Maxwell, true?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. You currently have a common interest
 23 agreement with Maxwell, true?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 21

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. You understand that your interests and
 5 Maxwell's interests are aligned in this case?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. What is your understanding of Maxwell's
 11 interest in this case?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. What is your understanding of your interest
 17 in this case?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. Since the start of 2015, you have
 23 communicated with Maxwell about how she can best
 24 respond to allegations made by Virginia?
 25 MR. PAGLIUCA: Object to form and

Page 22

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. Without going into the substance of any
 6 communications you have had, you've communicated with
 7 Maxwell since December 30th, 2014, true?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 MR. CASSELL: Can I understand what the
 12 objection is to form on that particular
 13 question?
 14 MR. PAGLIUCA: Do you want to have the
 15 reporter read it back?
 16 MR. CASSELL: I can just give it to
 17 you.
 18 MR. PAGLIUCA: Sure.
 19 MR. CASSELL: "Without going into any
 20 substance of any communications that you
 21 have had, you have communicated with Maxwell
 22 since December 30th, 2014, true?"
 23 MR. PAGLIUCA: It's a leading question.
 24 That's a form objection.
 25 MR. CASSELL: All right. So can we

Page 23

1 J. Epstein - Confidential
 2 just --
 3 MR. WEINBERG: And I would add a
 4 further objection, which is to the extent
 5 that any conversations which were pursuant
 6 to a common interest agreement, you would
 7 assert the attorney-client privilege as well
 8 as the Fifth Amendment.
 9 MR. GOLDBERGER: Right. So that
 10 objection we're making as to attorney-client
 11 privilege in no way waives the Fifth
 12 Amendment privilege that has been raised to
 13 the question.
 14 MR. CASSELL: Mr. Weinberg, since
 15 you're participating over my objection, can
 16 you confirm that there is a joint defense
 17 agreement between your client and
 18 Ms. Maxwell?
 19 MR. PAGLIUCA: I'm going to object to
 20 any interrogation of Mr. Weinberg. He's not
 21 been noticed for a deposition, he's not
 22 under oath, and he's not present here.
 23 MR. CASSELL: I'm just trying to
 24 understand the objection so that I can avoid
 25 it in any future questions.

Page 24

1 J. Epstein - Confidential
 2 What was the nature of your objection
 3 regarding common interest and joint defense
 4 agreement, Mr. Weinberg?
 5 MR. WEINBERG: It was direct status
 6 asserting the attorney-client privilege as
 7 well as the Fifth Amendment. I'm making no
 8 representations regarding the existence of
 9 any agreement.
 10 MR. CASSELL: All right. You also
 11 objected to my last question based on
 12 foundation. What was the foundation
 13 objection?
 14 MR. PAGLIUCA: There's multiple
 15 foundational issues. We don't know the
 16 source of any information that would be
 17 responsive to the question. It could
 18 contain hearsay and speculation. You know,
 19 all of these questions, frankly, lack
 20 foundation under the circumstances here.
 21 Frankly, I don't believe that there -- it
 22 will be a good faith basis for most of the
 23 questions. I don't believe that most of
 24 these questions will be supported by any
 25 independent evidence.

Page 25

1 J. Epstein - Confidential
 2 This is simply an exercise for you,
 3 Mr. Cassell, to use leading questions to try
 4 to obtain some adverse inference and
 5 advantage in this litigation, when you know
 6 that this witness is going to blanketly
 7 assert a Fifth Amendment privilege.
 8 Frankly, I see no point in actually
 9 having this deposition since all of these
 10 issues are going to need to be litigated
 11 before the court before we can actually have
 12 a determination of what Mr. Epstein may or
 13 may not testify about, so...
 14 MR. CASSELL: My specific question,
 15 though, is -- the question I asked Epstein
 16 was, "Without going into the substance of
 17 any communications that you have had, you
 18 have communicated with Maxwell since
 19 December 30th, 2014?"
 20 Since your client has testified under
 21 oath that she did indeed have communications
 22 with Epstein since December 30th, 2014, I
 23 can't understand why that question would
 24 lack a foundation.
 25 MR. PAGLIUCA: Well, I -- I've made my

Page 26

1 J. Epstein - Confidential
 2 record. It -- it is lacking in foundation.
 3 MR. CASSELL: All right.
 4 BY MR. CASSELL:
 5 Q. Without going into the substance of any
 6 communications that you have had, you have
 7 communicated with Maxwell since September 21st, 2015,
 8 true?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. How many communications have you had with
 14 Ms. Maxwell since December 30th, 2014?
 15 A. Fifth.
 16 Q. What methods of communications have you
 17 used when talking to Maxwell in the last two years?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. What e-mail accounts have you used in your
 23 communications with Maxwell?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 27

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. What e-mail accounts has Maxwell used in
 5 her communications with you?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. What is your cell phone number, sir?
 11 A. Fifth.
 12 Q. How many cell phones do you have?
 13 A. Fifth.
 14 Q. Please provide all of the cell phone
 15 numbers that you currently have access to?
 16 A. Fifth.
 17 Q. Please provide all the cell phone numbers
 18 that you had access to in 2000 and 2001?
 19 A. Fifth.
 20 Q. Please provide all of the e-mail accounts
 21 that you had access to in 2000 and 2001.
 22 A. Fifth.
 23 Q. Please provide all of the e-mail accounts
 24 that, to your knowledge, Ms. Maxwell had access to in
 25 2000 and 2001.

Page 28

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. You are a registered sex offender, correct?
 7 A. Fifth.
 8 Q. In previous depositions, you have stated
 9 that you are a registered sex offender, true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. In June 2008, in open court, you pled
 15 guilty to two Florida State felonies, correct?
 16 A. Fifth.
 17 Q. You were sworn to tell the truth in those
 18 public proceedings, true?
 19 A. Fifth.
 20 Q. In open court, what did you testify that
 21 you had done?
 22 A. Fifth.
 23 Q. And in my previous question, I'm referring
 24 to the plea proceeding that was in about June
 25 of 2008. Did you understand my question?

Page 29

1 J. Epstein - Confidential
 2 A. Yes.
 3 Q. In open court, what things did you say in
 4 that hearing?
 5 A. Fifth.
 6 Q. Did you tell the truth in that hearing?
 7 A. Fifth.
 8 Q. Did you tell the court that you accepted
 9 responsibility for those crimes?
 10 A. Fifth.
 11 Q. Were you accepting responsibility for those
 12 crimes?
 13 A. Fifth.
 14 Q. Why were you accepting responsibility for
 15 those crimes?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. Did you apologize to the victim of your
 21 crimes?
 22 A. Fifth.
 23 Q. One of the crimes to which you pled guilty
 24 in open court was soliciting a minor for
 25 prostitution, true?

Page 30

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Please describe how the solicitation to
 7 which you pled guilty was accomplished.
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 MR. CASSELL: Can you tell me what the form
 12 objection was to that?
 13 MR. PAGLIUCA: Please tell me how the
 14 solicitation was accomplished?
 15 MR. CASSELL: Yes.
 16 MR. PAGLIUCA: Okay. Well, you're
 17 asking for a legal definition from this lay
 18 witness as to solicitation, how it was
 19 accomplished. I don't know what that means.
 20 Your question is vague, it's ambiguous, it
 21 calls for a legal conclusion. It's also
 22 lacking in foundation.
 23 MR. CASSELL: Because?
 24 MR. PAGLIUCA: Well, as I understand
 25 it, your position is that he pled guilty to

Page 31

1 J. Epstein - Confidential
 2 made-up crimes that didn't have a factual
 3 basis and this was a conspiracy between
 4 Mr. Epstein and the U.S. Attorney's Office
 5 to avoid prosecution for federal criminal
 6 charges, which is the basis for your
 7 challenge to -- in the CVRA litigation, as I
 8 understand your pleadings. So I'm not
 9 exactly sure how you can actually have a
 10 good faith basis for asking that question,
 11 given your position in writing.
 12 MR. CASSELL: All right. You've
 13 mischaracterized our position. And I
 14 imagine we'll have to discuss that later.
 15 MR. PAGLIUCA: Sure.
 16 MR. CASSELL: Since there were
 17 objections to form, let me just try to ask a
 18 series of questions, then, to avoid the form
 19 objection.
 20 BY MR. CASSELL:
 21 Q. How did you accomplish the crime that you
 22 pled guilty to?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 32

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. What did you do that led you to plead
 4 guilty?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. What was your understanding of the legal
 10 crime to which you were pleading guilty?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. What was your understanding of what you
 16 were admitting in open court that day?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. Now, with regard to the two crimes that you
 22 pled guilty, where did those two crimes take place?
 23 A. Fifth.
 24 Q. And I suppose there could be a form
 25 objection to that question being compound. So to

Page 33

1 J. Epstein - Confidential
 2 obviate any issue, I'm going to ask you, was one of
 3 the victims in that case a girl who was 14 years old
 4 who we could identify by initials S.G.?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 MR. CASSELL: And Mr. Goldberger, is -- if
 9 we refer to the victim in -- I believe it was
 10 Count 1 or at least one of the accounts by S.G.
 11 Is that an acceptable way to proceed rather
 12 than putting her name into the record, or could
 13 I write her name out and provide that to you and
 14 your client? What would you -- I want to avoid
 15 putting the names of 14-year-old sex victims
 16 into the transcript here.
 17 MR. GOLDBERGER: It's your deposition.
 18 MR. CASSELL: All right. So what I'm
 19 going --
 20 BY MR. CASSELL:
 21 Q. Sir, you understand when I use the term
 22 "S.G." who I'm referring to, true?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential
 2 MR. CASSELL: And what I'm going to do is
 3 write the name of the victim and provide that to
 4 Mr. Goldberger and to Mr. Pagliuca now, so that
 5 when I use the term "S.G.," both Mr. Goldberger
 6 and Mr. Pagliuca will have that.
 7 MR. GOLDBERGER: Thank you.
 8 MR. CASSELL: And if you -- and then we
 9 should also provide that, of course, now to
 10 Mr. Epstein, so that he'll --
 11 MR. GOLDBERGER: He's -- he's seen it.
 12 MR. CASSELL: Okay.
 13 And then I'm going to do the same thing with
 14 the second witness. I'm going to refer to her
 15 by the initials [REDACTED]
 16 And I'm providing -- Let the record will
 17 reflect I'm providing the -- the full name
 18 of [REDACTED] to Mr. Goldberger, Mr. Pagliuca, and
 19 Mr. Epstein has seen it as well.
 20 BY MR. CASSELL:
 21 Q. Please describe how you accomplished the
 22 solicitation of S.G.
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Isn't it true, sir, that the solicitation
 4 of S.G. occurred in your Florida -- or I should say,
 5 Palm Beach mansion?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Who was regularly in your Palm Beach
 11 mansion at the time of the solicitation of [REDACTED]?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 MR. CASSELL: Could I understand the
 16 form objection to that question?
 17 MR. PAGLIUCA: "Who was regularly
 18 in..."
 19 Again, these are vague questions with
 20 no time frame, which is the form problem of
 21 your questions.
 22 BY MR. CASSELL:
 23 Q. Sir, with regard to my questions, I want
 24 you to understand that the time frame is the same
 25 time frame for the crime to which you pled guilty.

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Please describe how you accomplished the
 4 solicitation of [REDACTED]
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Where was the solicitation of S.G.
 10 accomplished?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. Where was the solicitation of [REDACTED]
 16 accomplished?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. Isn't it true, sir, that the solicitation
 22 of [REDACTED] occurred in your Palm Beach mansion?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential
 2 With regard to that time frame, who was
 3 regularly in your house?
 4 MR. PAGLIUCA: Form and foundation
 5 objection.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Sir, isn't it true that when you solicited
 9 [REDACTED] for sex, Maxwell was regularly in your Palm
 10 Beach mansion?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. Sir, isn't it true that when you solicited
 16 S.G. for sex, Maxwell was regularly in your Palm
 17 Beach mansion?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 And here, Mr. Cassell, there is no
 21 evidence that Ms. Maxwell was quote,
 22 unquote, regularly in the Palm Beach mansion
 23 during the time frame that you're talking
 24 about. And so there is no good faith basis
 25 to ask that question.

1 J. Epstein - Confidential
 2 MR. CASSELL: I disagree with your
 3 understanding of the record, but we'll take
 4 that up at a later time.
 5 BY MR. CASSELL:
 6 Q. How old was S.G. when you solicited her for
 7 sex?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. How old was [REDACTED] when you solicited her for
 13 sex?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Isn't it true, sir, that S.G. was under the
 19 age of 18 when you solicited her for sex?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Indeed, sir, isn't it true that S.G. was
 25 under the age of 16 when you solicited her for sex?

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. How old was [REDACTED] when you solicited her for
 7 sex?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Isn't it true, sir, that [REDACTED] was under the
 13 age of 18 when you solicited her for sex?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Sir, isn't it true you arranged for [REDACTED] to
 19 come to your Palm Beach mansion for sexual purposes?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Sir, isn't it true that you arranged for
 25 S.G. to come to your Palm Beach mansion for sexual

1 J. Epstein - Confidential
 2 purposes?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Sir, isn't it true that you had sex with
 8 S.G. at your Palm Beach mansion?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Sir, isn't it true that you had sex with
 14 [REDACTED] at your Palm Beach mansion?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. Sir, it required logistical arrangements
 20 for A.H. to come to your Palm Beach mansion, true?
 21 MR. PAGLIUCA: Object to the form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. Sir, it required logistical arrangements

1 J. Epstein - Confidential
 2 for S.G. to come to your Palm Beach mansion, true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Who helped make the logistical arrangements
 8 for S.G. to come to your Palm Beach mansion?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Who arranged -- who made -- I'm sorry. Let
 14 me strike that. Let me start over.
 15 Who made the logistical arrangements for
 16 S.G. to come to your Palm Beach mansion?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. Sir, isn't it true that Maxwell made the
 22 logistical arrangements or assisted with the
 23 logistical arrangements for S.G. to come to your Palm
 24 Beach mansion?
 25 MR. PAGLIUCA: Object to form and

Page 42

1 J. Epstein - Confidential
 2 foundation.
 3 And, again, there is no good faith
 4 basis to ask this question. There are no
 5 facts supporting any inference from that
 6 question, Mr. Cassell.
 7 MR. CASSELL: I disagree with your
 8 reading of the record on that.
 9 BY MR. CASSELL:
 10 Q. You can answer.
 11 A. Fifth.
 12 Q. Isn't it true that Maxwell helped to make
 13 the arrangements for [REDACTED] to come to your Palm Beach
 14 mansion either directly or indirectly?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 And, again, there is no evidence
 18 suggesting that that occurred with
 19 Ms. Maxwell on being involved, and there is
 20 no good faith basis to ask that question.
 21 BY MR. CASSELL:
 22 Q. Mr. Epstein, Mr. Pagliuca just said there
 23 was no good faith basis for me to ask that last
 24 question.
 25 It's true, sir, that you could give us a

Page 43

1 J. Epstein - Confidential
 2 very significant good faith basis for me asking that
 3 question, isn't it?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. In fact, at that time, Maxwell was
 9 regularly at your Palm Beach mansion, true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation, and asked and answered. Same
 12 objections.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. Who was running your Palm Beach mansion in
 16 2005?
 17 MR. PAGLIUCA: Object to form.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. Who was running your Palm Beach mansion in
 21 2006?
 22 MR. PAGLIUCA: Object to form.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. Who was running your Palm Beach mansion in

Page 44

1 J. Epstein - Confidential
 2 2000?
 3 MR. PAGLIUCA: Object to form.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Who was running your Palm Beach mansion in
 7 2001?
 8 MR. PAGLIUCA: Object to form.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. Sir, isn't it true that Ms. Maxwell was
 12 running your Palm Beach mansion in 2000?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 Again, there's no evidence to suggest
 16 Ms. Maxwell was running anything.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. Mr. Epstein, there is lots of evidence to
 20 suggest that Ms. Maxwell was running your home from
 21 1999 through about 2006, true?
 22 MR. PAGLIUCA: Object to form and
 23 foundation. Argumentative.
 24 THE WITNESS: Fifth.
 25

Page 45

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Sir, Miss Maxwell was running your Palm
 4 Beach mansion in 2001, true?
 5 MR. PAGLIUCA: Object -- same
 6 objections that I've raised before. This is
 7 asked and answered.
 8 MR. CASSELL: With regard to 2001 asked
 9 and answered?
 10 MR. PAGLIUCA: I think so.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Sir, Ms. Maxwell was running your Palm
 14 Beach mansion in 2002, true?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. Sir, Ms. Maxwell was running your Palm
 20 Beach mansion in 2003, true?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. Sir, Miss Maxwell was running your Palm

Page 46

1 J. Epstein - Confidential
 2 Beach mansion in 2004, true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Sir, Ms. Maxwell was running your Palm
 8 Beach mansion in 2005, true?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Sir, Ms. Maxwell was running your Palm
 14 Beach mansion in 2006, true?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. Who had access to the financial accounts
 20 for your Palm Beach mansion in 2005?
 21 A. Fifth.
 22 Q. Sir, isn't it true that Ms. Maxwell had
 23 access to the financial accounts for your Palm Beach
 24 mansion in 2005?
 25 MR. PAGLIUCA: Object to form and

Page 47

1 J. Epstein - Confidential
 2 foundation.
 3 And, again, there's no evidence to
 4 suggest that Ms. Maxwell had access to
 5 financial accounts of Mr. Epstein in 2005.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Ms. Maxwell did indeed have access to some
 9 of your financial accounts in 2005, true, sir?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 MR. GOLDBERGER: Mr. Cassell, can we
 14 just take a 30-second break? I think I have
 15 a logistical problem when I -- when I
 16 connected Mr. Weinberg. I used a line that
 17 was on service. So, I mean, give me two
 18 seconds.
 19 MR. CASSELL: All right. And we're
 20 just going to confer for a moment, if that's
 21 all right.
 22 MR. GOLDBERGER: Thank you.
 23 VIDEO TECHNICIAN: Off the record at
 24 9:04 a.m.
 25 (A recess was taken.)

Page 48

1 J. Epstein - Confidential
 2 VIDEO TECHNICIAN: On the record at
 3 9:10 a.m.
 4 MR. GOLDBERGER: Thank you for the
 5 break.
 6 BY MR. CASSELL:
 7 Q. Sir, who did you talk to during the break?
 8 A. Fifth.
 9 MR. GOLDBERGER: And attorney-client.
 10 MR. CASSELL: But you believe there's a
 11 good faith basis for him to say what was just
 12 discussed would be incriminating?
 13 MR. GOLDBERGER: Objection's been
 14 raised. Privileged has been invoked.
 15 MR. CASSELL: All right.
 16 BY MR. CASSELL:
 17 Q. Without going into the substance of any
 18 communications, who did you speak to during the
 19 break?
 20 A. Fifth.
 21 MR. GOLDBERGER: Attorney-client.
 22 Again, we're raising attorney-client
 23 privilege without waiving any Fifth
 24 Amendment privileges.
 25 MR. CASSELL: Understood.

Page 49

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. You know who Alfredo Rodriguez is, sir,
 4 true?
 5 A. Fifth.
 6 Q. Who is Alfredo Rodriguez?
 7 A. Fifth.
 8 Q. Alfredo Rodriguez was involved in some
 9 household management issues in your Palm Beach
 10 mansion in 2005, true?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. What did Alfredo Rodriguez do for you in
 16 2005?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. Who did Alfredo Rodriguez report to in
 22 2005?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 50

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Sir, isn't it true that Alfredo Rodriguez
 4 reported to Maxwell in 2005?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 There's no evidence to suggest that he
 8 reported to Ms. Maxwell.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. Who is Sarah Kellen?
 12 A. Fifth.
 13 Q. You know Sarah Kellen, don't you?
 14 A. Fifth.
 15 Q. What did Sarah Kellen do for you at your
 16 Palm Beach mansion?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. Did Alfredo Rodriguez work for you in 2005?
 22 A. Fifth.
 23 Q. How many years did Alfredo Rodriguez work
 24 for you?
 25 A. Fifth.

Page 51

1 J. Epstein - Confidential
 2 Q. Sarah Kellen reported to Maxwell, true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 There's no evidence to suggest that
 6 Miss Kellen reported to Miss Maxwell.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Mr. Epstein, you could give us lots of
 10 evidence that Sarah Kellen reported to Maxwell, true?
 11 MR. PAGLIUCA: Object to form.
 12 Foundation. Argumentative.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. Sarah Kellen and Ghislaine Maxwell both
 16 assisted you in the solicitation of S.G., true?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 And, again, there's no evidence to show
 20 that Miss Maxwell participated in the
 21 solicitation of anybody.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Please give us all the evidence that
 25 Maxwell participated in the solicitation of minors.

Page 52

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Sarah Kellen and Ghislaine Maxwell both
 7 assisted in the solicitation of [REDACTED] true?
 8 MR. PAGLIUCA: Obj c to form and
 9 foundation.
 10 Again, there is no evidence to suggest
 11 that that's true.
 12 And, Mr. Cassell, if you have some good
 13 faith basis and you want to put it on the
 14 record, that's fine. I have the Palm Beach
 15 Police Department reports here. We deposed
 16 Detective Racari. You know, as well as I
 17 do, that there's no evidence to suggest that
 18 Ms. Maxwell was involved with [REDACTED] at all.
 19 MR. CASSELL: I move to strike the
 20 speaking objections. They're improper in
 21 this deposition. And there's a time and a
 22 place to put on both your point of views on
 23 these issues and, of course, our point of
 24 view as well.
 25 MR. PAGLIUCA: Well, that's fine. You

Page 53

1 J. Epstein - Confidential
 2 know, if we can understand that my form and
 3 foundation objection encompasses what you're
 4 deeming as speaking objections, I can
 5 certainly truncate this and just make my
 6 form and foundation objections.
 7 MR. CASSELL: My understanding of the
 8 proper procedure is, you should object on
 9 form and foundation unless I ask for further
 10 clarification. That's all you need to make
 11 the record.
 12 MR. PAGLIUCA: Okay. And that form and
 13 foundation objection, then, would include my
 14 position that there's no good faith basis to
 15 be asking these questions; is that correct?
 16 MR. CASSELL: That's correct. That
 17 would be your position. And of course, our
 18 position would be to the contrary.
 19 MR. PAGLIUCA: I understand. I'm just
 20 trying to make sure that we're not waiving
 21 anything, and I'm happy just to --
 22 MR. CASSELL: Sure.
 23 MR. PAGLIUCA: -- simply to object to
 24 form and foundation, preserving any
 25 objections I have to the questioning and the

1 J. Epstein - Confidential
 2 process of the proceeding. Fair?
 3 MR. CASSELL: You would be preserving,
 4 obviously, a form objection and a foundation
 5 objection.
 6 MR. PAGLIUCA: Sure. I guess the
 7 questions then becomes what does that mean.
 8 MR. CASSELL: Right.
 9 MR. PAGLIUCA: So I can keep objecting,
 10 as I am, or we can have some agreement. But
 11 why don't we keep going and we'll see what
 12 happens.
 13 MR. CASSELL: Right. And I -- it would
 14 be my position that anything beyond form and
 15 foundation should be stricken.
 16 MR. PAGLIUCA: Okay.
 17 MR. CASSELL: Unless you can -- and
 18 that's -- that's the way to proceed.
 19 (Plaintiff's Exhibit JE1, Transcript of the
 20 deposition of Ms. Maxwell taken on April 22nd, 2016
 21 was marked for identification.)
 22 BY MR. CASSELL:
 23 Q. All right. Sir, I want to hand you a
 24 document, which I'm document I'm going to mark as JE1
 25 for Jeffrey Epstein 1. And I'll represent and

1 J. Epstein - Confidential
 2 provided a copy to both Mr. Goldberger and
 3 Mr. Pagliuca. I represent that this is a transcript
 4 of the deposition of Ms. Maxwell taken on April 22nd,
 5 2016.
 6 You have that document in front of you,
 7 sir?
 8 A. Yes.
 9 Q. If I could ask you to flip to page 100.
 10 And since there are two sets of numbers, this would
 11 be the smaller set of numbers up on the, for example,
 12 the top of the page. These -- these are four pages
 13 per page. And page 100. I'd like to direct your
 14 attention to page 100, line 8. Actually, I'm sorry,
 15 page 100, line 10.
 16 Do you see where I am, sir?
 17 A. Yes.
 18 Q. On line 10 there is a question: "Did
 19 Jeffrey -- was it Jeffrey's preference to start a
 20 massage with sex?"
 21 Do you see that question, sir?
 22 A. Yes.
 23 Q. And then if we skip over two lines where
 24 there's a form and foundation objection, we go to
 25 line 14 where there is an answer given by

1 J. Epstein - Confidential
 2 Ms. Maxwell.
 3 Do you see that answer?
 4 A. Yes.
 5 Q. The answer is, "I think you should ask that
 6 question of Jeffrey."
 7 Do you see that answer?
 8 A. Yes.
 9 Q. So following up on Ms. Maxwell's
 10 suggestion, I'm going to ask you the same question.
 11 Was it your preference to start a massage
 12 with sex?
 13 A. Fifth.
 14 Q. It is true that your preference was to
 15 start a massage with sex?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. I don't know that I completely finished the
 21 question. So let me just re-ask it.
 22 It is true that your preference was to
 23 start a massage with sex, correct?
 24 MR. PAGLIUCA: Objection to form and
 25 foundation.

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. To your knowledge, when she was deposed on
 5 April 22nd, 2016, Maxwell knew that your preference
 6 was to start a massage with sex, true?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. It is true that you directed Maxwell to
 12 recruit girls under the age of 18 who would have sex
 13 with you all under the guise of providing a massage,
 14 correct?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. One of the girls under the age of 18 with
 20 whom you had massages starting with sex was Virginia,
 21 true?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 58

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Maxwell has been present many times when
 4 you have had massages starting with sex, true?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. All right. Now, I want to go in the same
 10 exhibit, a little further in at page 146.
 11 All right. On page 146, line 22, do you
 12 see line 22 on page 146?
 13 A. Yes.
 14 Q. And do you see a question there that reads,
 15 "So would Virginia be brought on trips that were for
 16 the purpose of work and decorating the house?"
 17 Do you see that question?
 18 A. Yes.
 19 Q. And then do you see following on
 20 immediately the answer from Ms. Maxwell: "Like I
 21 said, I never worked with her, but you would have to
 22 ask Jeffrey what he brought her on the trip for."
 23 Do you see that answer?
 24 A. Yes.
 25 Q. And so I represent to you that that's an

Page 59

1 J. Epstein - Confidential
 2 answer from Ms. Maxwell, and will you understand that
 3 as I ask further questions with regard to this
 4 transcript?
 5 A. Yes.
 6 Q. So following up on Ms. Maxwell's direction,
 7 I would like to ask you, why did you bring -- bring
 8 Virginia on the trip to New Mexico?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. You did bring Virginia on a trip to New
 14 Mexico, true, sir?
 15 MR. PAGLIUCA: Object to foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Why did you bring Virginia on your trips
 19 with you?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. With regard to the New Mexico trip that
 25 we're discussing here, isn't it true that you brought

Page 60

1 J. Epstein - Confidential
 2 Virginia there for sexual purposes?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Maxwell was fully aware that Virginia was
 8 in New Mexico for sexual purposes, true?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Can you think of any other purpose which an
 14 attractive 17-year-old girl would be on your property
 15 at that time, sir?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. Maxwell knew there was no other purpose for
 21 Virginia being there at that time other than sex,
 22 true?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 61

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Is there anyone else I can talk to besides
 4 you, Virginia, and Maxwell to give information about
 5 why Virginia was at your ranch in New Mexico?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. There is no one else I can talk to you
 11 besides you, Virginia, and Maxwell to get exact
 12 information about why Virginia was at your ranch in
 13 New Mexico, true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Let's go now to page -- actually, let me
 19 ask one quick question while I'm thinking about it,
 20 or I'll come back to that in a moment.
 21 Let's go to page 196. You see on line 3 of
 22 196 you see a question: "What has Jeffrey told you
 23 about Virginia Roberts?"
 24 Do you see that, sir?
 25 A. Yes.

Page 62

1 J. Epstein - Confidential
2 Q. And then there's an answer in line 5. Do
3 you see that?
4 A. Yes.
5 Q. The answer is that "She is a liar."
6 Do you see -- is -- I represent to you that
7 that is Ms. Maxwell stating that you said Virginia
8 Roberts is a liar.
9 Is that accurate testimony from
10 Ms. Maxwell?
11 A. Fifth.
12 Q. On line 6, that's not accurate testimony
13 from Ms. Maxwell, is it?
14 MR. PAGLIUCA: Object to form and
15 foundation.
16 THE WITNESS: Sorry. Repeat the
17 question.
18 BY MR. CASSELL:
19 Q. It is not accurate testimony what we see on
20 line 5 there, is it?
21 A. You said, "line 6," I believe, sir.
22 Q. I'm sorry. Let me --
23 A. Sorry.
24 Q. Yeah. Let's --
25 So you see a question on line 3, correct,

Page 63

1 J. Epstein - Confidential
2 sir?
3 A. Yes.
4 Q. And the question on line 3 is, "What has
5 Jeffrey Epstein told you about Virginia Roberts?"
6 That's the question there?
7 A. Yes.
8 Q. And on line 5 there's an answer from
9 Ms. Maxwell that "She is a liar."
10 Do you see that answer?
11 A. Yes.
12 Q. That answer is not accurate testimony, is
13 it, sir?
14 MR. PAGLIUCA: Object to form and
15 foundation.
16 THE WITNESS: Fifth.
17 BY MR. CASSELL:
18 Q. When Ms. Maxwell gave that testimony, she
19 well knew that Virginia was not a liar, true?
20 MR. PAGLIUCA: Object to form and
21 foundation.
22 THE WITNESS: Fifth.
23 BY MR. CASSELL:
24 Q. Going now to line 6 there is a question,
25 "What does he base that on?"

Page 64

1 J. Epstein - Confidential
2 Do you see that question?
3 A. Yes.
4 Q. And then skipping over a form and
5 foundation objection, on line 9 we see an answer from
6 Maxwell, "You would have to check with him."
7 Do you see that?
8 A. That's incomplete, but, yes.
9 Q. And then the sentence carries on, "I can
10 tell you why I think she is a liar. I'm happy to do
11 that."
12 Do you see the rest of that?
13 A. Yes.
14 Q. But I want to focus in on the first part of
15 that sentence, "You would have to check with him."
16 Do you see that answer?
17 A. Yes.
18 Q. And that answer, you understand in context
19 to be a request from Maxwell that we check with you?
20 Do you understand that?
21 MR. PAGLIUCA: Object to form and
22 foundation.
23 THE WITNESS: Fifth.
24 BY MR. CASSELL:
25 Q. So I would like to check with you now.

Page 65

1 J. Epstein - Confidential
2 What do you base your assessment of
3 Ms. Roberts' credibility on?
4 A. Fifth.
5 Q. It's true, sir, that Virginia is highly
6 credible, isn't it?
7 MR. PAGLIUCA: Object to form and
8 foundation.
9 THE WITNESS: Fifth.
10 BY MR. CASSELL:
11 Q. When Virginia has said you were a sex
12 trafficker, that's a true statement, right, sir?
13 MR. PAGLIUCA: Object to form and
14 foundation.
15 THE WITNESS: Fifth.
16 BY MR. CASSELL:
17 Q. When Virginia has said that you had
18 sexually abused her, that's a true statement, isn't
19 it, sir?
20 MR. PAGLIUCA: Object to form and
21 foundation.
22 THE WITNESS: Fifth.
23 BY MR. CASSELL:
24 Q. And when Virginia said Maxwell sexually
25 abused her, you know that to be a true statement as

Page 66

1 J. Epstein - Confidential
 2 well, don't you?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Virginia has told the truth about you using
 8 Maxwell to recruit girls for you to sexually abuse,
 9 true, sir?
 10 MR. PAGLIUCA: Objection to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Please give us all the information that you
 15 have regarding how credible Virginia is.
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. Please give us all information you have
 21 about Virginia's credibility on issues relating to
 22 sex abuse.
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 67

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Please give us all information you have
 4 showing that Virginia is credible about allegations
 5 she's made against you.
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Please give us all the information you have
 11 about how Virginia is credible with regard to her
 12 allegations against Maxwell.
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Is there anybody else that I could check
 18 with besides you to follow up on Ms. Maxwell's
 19 suggestion of obtaining information about Virginia's
 20 credibility with regard to sexual abuse by you?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. Sir, it's true that the only one who knows

Page 68

1 J. Epstein - Confidential
 2 about threesomes between you, Maxwell, and her would
 3 be the three of you, correct?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. And when I refer -- refer to "a threesome"
 9 in today's deposition, will you understand that I'm
 10 referring to sexual activity among three people
 11 occurring essentially simultaneously?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. What is your understanding of the term
 17 "threesome"?
 18 A. Fifth.
 19 Q. Without regard to any conduct that you may
 20 or not have undertaken in the past, what do you
 21 understand the word "threesome" to mean?
 22 A. Fifth.
 23 Q. Let's now go to page 197 of the transcript.
 24 Oh, I'm sorry. Actually, let's go to the very bottom
 25 of page 196.

Page 69

1 J. Epstein - Confidential
 2 Do you see line 25 on page 196?
 3 A. Yes.
 4 Q. And the question is: "That's all he said
 5 about Virginia?"
 6 Do you see that question?
 7 A. I don't see a question mark, do you?
 8 Q. On line 2 of page 197?
 9 A. Yes.
 10 Q. And so this is a reference back to line 24
 11 on page 196. Do you see line 24 on page 196?
 12 A. Yes.
 13 Q. And the answer there from Maxwell is, "All
 14 he" -- that is Epstein in context -- "told me that
 15 she is a liar."
 16 Do you see that answer? Do you see the
 17 answer there on line 24?
 18 A. Yes.
 19 Q. That is not accurate testimony, is it, sir?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. In fact, you told Ms. Maxwell that you were
 25 very concerned that people would learn the truth

Page 70

1 J. Epstein - Confidential
 2 about your activities with Virginia, true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. In fact, both you and Ms. Maxwell were very
 8 concerned that people would learn the truth about
 9 Virginia's allegations, true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. And you and Ms. Maxwell undertook a plan at
 15 that point to try and undercut Virginia's
 16 credibility, true?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 Can you mark those for me, Reporter,
 20 those last three questions? Thank you.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. I'm sorry. On page 197, line 3, there's an
 24 answer, "We went through all the lies that you have
 25 sold to the papers and sold in general, and we have

Page 71

1 J. Epstein - Confidential
 2 analyzed her lies and your lies and your
 3 inappropriate behavior in detail."
 4 Do you see that answer?
 5 A. Yes.
 6 Q. That is not a fair and accurate recounting
 7 of your conversation with Maxwell, is it?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. In fact, the two of you were not worried
 13 about the lies that Virginia was telling, but the
 14 truthful statements -- let me strike that.
 15 In fact, you were not concerned in any way
 16 about any lies Virginia was telling because she was
 17 not lying, true?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. You were concerned that Virginia was
 23 telling the truth, weren't you?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 72

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. You never denied to Maxwell that you had
 5 sexual relations with Virginia, did you?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. And in fact, Maxwell well knew that you had
 11 sexual relations with Virginia because she had been
 12 with you when you were having sexual relations with
 13 Virginia?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Let's go now to page 217 of the transcript.
 19 If you look at line 23 on page 217, do you
 20 see a question, "Is it an obvious -- who did lead her
 21 up to Jeffrey's room while you were talking to her
 22 mother?"
 23 Do you see that question?
 24 A. Yes.
 25 Q. And I'll represent to you that the "her" in

Page 73

1 J. Epstein - Confidential
 2 that question is a reference to Virginia.
 3 Do you understand that to be the question?
 4 A. Yes.
 5 Q. And if we go over onto the next page, then,
 6 we see, "Answer: You would have to ask Virginia. I
 7 don't know if she was led up to his room."
 8 Do you see that answer?
 9 A. Yes.
 10 Q. There's actually another person that we
 11 could ask, apart from Virginia, who would know who
 12 led her up to your room; isn't that true, sir?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. The first time you met Virginia, where did
 18 you meet her?
 19 A. Fifth.
 20 Q. Isn't it true that the first time you met
 21 virgin what was in your massage room in your Palm
 22 Beach mansion?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 74

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Isn't it true that Maxwell led Virginia up
 4 to your Palm Beach mansion massage room the first
 5 time you met her?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. You saw Maxwell bringing Virginia up to
 11 your room, true, sir?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. Isn't it true that it was standard
 17 operating procedure for Maxwell to bring underage
 18 girls up to your room?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Isn't it true that it was standard
 24 operating procedure for Maxwell to bring underage
 25 girls up to your room for you to sexually abuse?

Page 75

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Isn't it true that Maxwell's sworn
 7 testimony is inaccurate when she says she didn't
 8 bring Virginia up to your room?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Isn't it true that Maxwell was perjuring
 14 herself when she said she didn't know who brought
 15 Virginia up to your room?
 16 MR. PAGLIUCA: Object to form
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. Let's go now to page 229 of the transcript,
 21 line 11.
 22 Do you see the question there, "So not the
 23 first time she came but the second time she came or
 24 the third time or any time she came, did you ever
 25 participate in a massage with her in

Page 76

1 J. Epstein - Confidential
 2 Jeffrey Epstein's room?"
 3 Do you see that question?
 4 A. Yes.
 5 Q. And then you see an answer there, "I have
 6 never participated at any time with Virginia in a
 7 massage with Jeffrey."
 8 Do you see that answer?
 9 A. Yes.
 10 Q. And I represent to you the answer is being
 11 given by Ms. Maxwell during a sworn deposition. Will
 12 you understand that with regard to my questions here?
 13 A. Yes.
 14 Q. Miss Maxwell's testimony is not truthful,
 15 is it, sir?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. In fact, you, Maxwell, and Virginia all had
 21 sexual contact together at the same time on multiple
 22 occasions, true?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 77

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. How many times have you, Maxwell, and
 4 Virginia had sexual contact together?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. On multiple occasions you and Maxwell
 10 jointly participated in sexual abuse of Virginia,
 11 true?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. Have you and Maxwell ever jointly
 17 participated in the sexual abuse of Virginia?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. How many times have you and Maxwell jointly
 23 participated in the sexual abuse of Virginia?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 78

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. Your understanding of all the facts in this
 5 case is that Maxwell was lying when she denied sexual
 6 abuse of Virginia, true?
 7 MR. PAGLIUCA: Objection to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. If Maxwell had told the truth in her
 12 deposition, she would have admitted to sexually
 13 abusing Virginia, true?
 14 MR. PAGLIUCA: Objection to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. When you and Maxwell were jointly sexually
 19 abusing Virginia, who were the witnesses to that
 20 activity?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. It's true, sir, that when you and Maxwell

Page 79

1 J. Epstein - Confidential
 2 were jointly sexually abusing Virginia, you two were
 3 the only two witnesses who could see what was going
 4 on?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Are there any other witnesses I should call
 10 to try to depose and talk to to see whether you and
 11 Maxwell were jointly sexually abusing Virginia?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. How many times did you and Maxwell have sex
 17 with Virginia?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21
 22 BY MR. CASSELL:
 23 Q. How many times did you have sex with
 24 Virginia?
 25 MR. PAGLIUCA: Object to form and

Page 80

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. How many times, to your knowledge, did
 6 Maxwell have sex with Virginia?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. Sir, it's true that you had sex with
 12 Virginia dozens if not hundreds of times; isn't that
 13 true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. And to your knowledge, Maxwell had sex with
 19 Virginia dozens and dozens of times, true?
 20 MR. PAGLIUCA: Objection to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. What years did you and Maxwell have sex
 25 with Virginia?

Page 81

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. It's true that you and Maxwell had sex with
 7 Virginia in the year 2000, true?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. It's true that you and Maxwell had sex with
 13 Virginia in the year 2001, true?
 14 MR. PAGLIUCA: Object to forma and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. You had sex with Virginia repeatedly when
 19 she was under the age of 18, true?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. You also had sex with Virginia when she was
 25 under the age of 17, true?

Page 82

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. You had sex with Virginia when she was
 7 16 years old, true?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Maxwell had sex with Virginia when she was
 13 16, true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Maxwell had sex with Virginia when she was
 19 17, true?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 MR. CASSELL: If I could just confer
 24 with counsel for a moment.
 25 (A discussion was held off the record.)

Page 83

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. You have a sexual preference for having sex
 4 with girls between the ages of 12 to 17, true?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Between 2000 and 2005, you sexually abused
 10 more than 100 girls under the age of 18 in Florida,
 11 true?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. Between 2000 and 2005, you also sexually
 17 abused dozens of girls in other locations as well,
 18 true?
 19 MR. PAGLIUCA: Objection to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. In about 2002, you and Maxwell asked
 24 Virginia to carry a baby for the two of you, true?
 25 MR. PAGLIUCA: Object to form and

Page 84

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. When you asked Virginia to carry a baby for
 6 you, part of your proposal was for her to turn the
 7 baby over to the two of youth -- to the two of you at
 8 the end of the pregnancy, true?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. In about June or July of 2001, you and
 14 Maxwell took Virginia to a hospital in New York City
 15 because of a problem she was having with vaginal
 16 bleeding, true?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. When you and Maxwell took Virginia to the
 22 hospital, the two of you lied to the hospital to make
 23 her age 18 rather than 17, true?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 85

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. You and Maxwell have had so-called
 5 threesomes, i.e., sexual activity with three people
 6 at the same time, with multiple girls who were under
 7 the age of 18, true?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Many of these threesomes occurred in
 13 Florida, true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. You and Maxwell have also participated in
 19 sex orgies with Virginia, true?
 20 MR. PAGLIUCA: Objection to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. You and Maxwell participated in sex orgies
 25 with Virginia while she was under the age of 18,

Page 86

1 J. Epstein - Confidential
 2 true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. You and Maxwell participated in sex orgies
 8 with many other girls, true?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 THE COURT REPORTER: Excuse me. Can we
 13 go off the record? I'm sorry.
 14 VIDEO TECHNICIAN: Off the record at
 15 9:39 a.m.
 16 (A discussion was held off the record.)
 17 VIDEO TECHNICIAN: On the record at
 18 9:41.
 19 BY MR. CASSELL:
 20 Q. Sir, without regard to any conduct that you
 21 may or may not have committed, what do you understand
 22 the word "orgy" to mean?
 23 A. Fifth.
 24 Q. Sir, in the summer of 2000, you first met
 25 Miss Virginia Giuffre in your Palm Beach mansion,

Page 87

1 J. Epstein - Confidential
 2 true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Ms. Maxwell was the person who first
 8 introduced you to Virginia, true?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. At the time, Virginia was just 16 years
 14 old, true?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. When you first met Miss Giuffre -- and I
 20 guess I'll refer to as Virginia for the rest of these
 21 questions -- her physical appearance to you was that
 22 she was only 16 years old, true?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 88

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. The reason Maxwell introduced Virginia to
 4 you was so that you could have sex with Virginia,
 5 true?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. In fact, on a number of occasions in 2000
 11 and 2001, both you and Maxwell simultaneously had sex
 12 with Virginia, true?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Without going into detail, please describe
 18 the nature of the sex acts that you performed on
 19 Virginia in 2000 and 2001?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Without going into detail, please describe
 25 the nature of the sex acts that you observed Maxwell

Page 89

1 J. Epstein - Confidential
 2 perform on Virginia in 2000 and 2001.
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. In the fall of 2000, you and Maxwell
 8 trained Virginia on how to cater to the sexual
 9 desires of your male friends, true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. And from 2000 through 2002, you forced
 15 Virginia to interact sexually with many of your male
 16 friends, true?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. From 2000 through 2001, you forced Virginia
 22 to sexually interact with Harvard Law Professor,
 23 Alan Dershowitz?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 90

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. It would be a fair statement to describe
 5 Virginia's situation from the fall of 2000 through
 6 July 2001 as your sex slave, true?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. You understand the term "sex slave," don't
 12 you, sir?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Without to regard to any conduct that you
 18 may or may not have committed, what does the term
 19 "sex slave" mean to you?
 20 A. Fifth.
 21 (Plaintiff's Exhibit JE2, Document with
 22 titles of books was marked for identification.)
 23 BY MR. CASSELL:
 24 Q. I'm going to show you what I'll mark as
 25 JE2.

Page 91

1 J. Epstein - Confidential
 2 A. Are you finished with this?
 3 Q. Yeah. We're through with that now.
 4 You recognize the books listed on this
 5 document, don't you, sir?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. The first book listed here as being sold by
 11 Amazon is "Slave Craft: Road Maps For Erotic
 12 Servitude, Principles, Skills, and Tools."
 13 Do you see that, sir?
 14 A. Yes.
 15 Q. That was a book you ordered, sir, true?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. The second book listed here is "Training
 21 With Ms. Abernathy. A Workbook For Erotic Slaves and
 22 Their Owners."
 23 Do you see that there, sir?
 24 A. Yes.
 25 Q. That was another book that you ordered,

Page 92

1 J. Epstein - Confidential
 2 true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. You relied on the Defendant in this case,
 8 Ghislaine Maxwell, to keep Virginia available for to
 9 you sexually abuse, true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Are we finished with
 13 this?
 14 BY MR. CASSELL:
 15 Q. Yes.
 16 MR. CASSELL: Did we get an answer to
 17 -- to that?
 18 MR. PAGLIUCA: Yes, you did. We did
 19 not?
 20 MR. GOLDBERGER: Yes. I thought he
 21 said the Fifth.
 22 BY MR. CASSELL:
 23 Q. Let me just re-ask the question, because
 24 it's an important one.
 25 Sir, you relayed on the Defendant in this

Page 93

1 J. Epstein - Confidential
 2 case, Ms. Maxwell, to keep Virginia available --
 3 available for you to sexually abuse, true?
 4 MR. PAGLIUCA: Objection to the form
 5 and foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. What did Miss Maxwell do for you in the
 9 years 2001 and 2001?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Please briefly describe the nature of the
 15 interactions you observed between the Defendant in
 16 this case, Ms. Maxwell, and the Plaintiff in this
 17 case, Ms. Virginia Roberts, from -- Miss Virginia
 18 Roberts Giuffre, from the fall of 2000 through the
 19 summer of 2001.
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. The reason you're taking the Fifth, with
 25 regard to Maxwell's interactions, is that she was

Page 94

1 J. Epstein - Confidential
 2 involved in the sexual abuse of Virginia, true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Please describe the massage room upstairs
 8 in your Palm Beach mansion.
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. It's true, sir, that you do have a massage
 14 room upstairs in your Palm Beach mansion, right?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. What kinds of rooms do you have upstairs in
 20 your Palm Beach mansion?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. In that massage room, Maxwell kept a basket

Page 95

1 J. Epstein - Confidential
 2 of sex toys, true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. And if we narrow the time frame down to the
 8 years 2000 and 2001, Maxwell had a basket of sex toys
 9 there, true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Maxwell used sex toys on Virginia in your
 15 presence, true?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. What is your understanding of the term "sex
 21 toy" without regard to any conduct that you may or
 22 may not have committed in the past?
 23 A. Fifth.
 24 Q. Before August 2001, Maxwell forcibly
 25 penetrated Virginia with an artificial penis or dildo

Page 96

1 J. Epstein - Confidential
 2 in your presence, true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. You and Maxwell flew together with Virginia
 8 over 20 times when Virginia was under the age of 18,
 9 true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. How many times did you and Maxwell fly
 15 together with Virginia before August of 2001?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. You and Maxwell trafficked Virginia while
 21 she was under the age of 17 to other men for sexual
 22 purposes, true?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 97

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. During the period of time 2000 to 2001, you
 4 were having sex as many as three times a day, true?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. And during that time period, Maxwell was
 10 bringing girls to you to take the pressure off her to
 11 have that much sex, true?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. You and Maxwell asked girls under the age
 17 of 18 to bring other girls under the age of 18 to you
 18 for sexual purposes, true?
 19 MR. PAGLIUCA: Objection to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 Can I have some water?
 23 MR. CASSELL: Uh-huh.
 24 BY MR. CASSELL:
 25 Q. Maxwell was in charge of coordinating the

Page 98	Page 100
<p>1 J. Epstein - Confidential</p> <p>2 girls who came to your house for sexual purposes,</p> <p>3 true?</p> <p>4 MR. PAGLIUCA: Object to form and</p> <p>5 foundation.</p> <p>6 THE WITNESS: Fifth.</p> <p>7 BY MR. CASSELL:</p> <p>8 Q. Maxwell and your house staff used message</p> <p>9 pads to coordinate the schedule for the girls coming</p> <p>10 over to your houses, true?</p> <p>11 MR. PAGLIUCA: Object to form and</p> <p>12 foundation.</p> <p>13 THE WITNESS: Fifth.</p> <p>14 BY MR. CASSELL:</p> <p>15 Q. Maxwell often paid the girls who came over</p> <p>16 to your house for sexual purposes, true?</p> <p>17 MR. PAGLIUCA: Object to form and</p> <p>18 foundation.</p> <p>19 THE WITNESS: Fifth.</p> <p>20 BY MR. CASSELL:</p> <p>21 Q. Who paid the girls who came over to your</p> <p>22 house for sexual purposes?</p> <p>23 MR. PAGLIUCA: Object to form and</p> <p>24 foundation.</p> <p>25 THE WITNESS: Fifth.</p>	<p>1 J. Epstein - Confidential</p> <p>2 metropolitan area?</p> <p>3 MR. PAGLIUCA: Object to form and</p> <p>4 foundation.</p> <p>5 THE WITNESS: Fifth.</p> <p>6 BY MR. CASSELL:</p> <p>7 Q. On that trip you stayed in London at</p> <p>8 Maxwell's flat, true?</p> <p>9 MR. PAGLIUCA: Object to form and</p> <p>10 foundation.</p> <p>11 THE WITNESS: Fifth.</p> <p>12 BY MR. CASSELL:</p> <p>13 Q. At that time, it would be a fair assessment</p> <p>14 to say that Maxwell was your girlfriend, true?</p> <p>15 MR. PAGLIUCA: Object to form and</p> <p>16 foundation.</p> <p>17 THE WITNESS: Fifth.</p> <p>18 BY MR. CASSELL:</p> <p>19 Q. In March of 2001, who was your girlfriend?</p> <p>20 A. Fifth.</p> <p>21 Q. During that trip, in March of 2001,</p> <p>22 Maxwell, Virginia, and Prince Andrew, that is, the</p> <p>23 Duke of York, all met at night inside Maxwell's flat,</p> <p>24 true?</p> <p>25 MR. PAGLIUCA: Object to form and</p>
Page 99	Page 101
<p>1 J. Epstein - Confidential</p> <p>2 BY MR. CASSELL:</p> <p>3 Q. Maxwell used the prospect that girls could</p> <p>4 become models for Victoria's Secret to lure them over</p> <p>5 to your house, true?</p> <p>6 MR. PAGLIUCA: Object to form and</p> <p>7 foundation.</p> <p>8 THE WITNESS: Fifth.</p> <p>9 BY MR. CASSELL:</p> <p>10 Q. How did you lure girls over to your house</p> <p>11 for sexual purposes?</p> <p>12 MR. PAGLIUCA: Object to form and</p> <p>13 foundation.</p> <p>14 THE WITNESS: Fifth.</p> <p>15 BY MR. CASSELL:</p> <p>16 Q. What techniques did you see Maxwell using</p> <p>17 to lure girls over to your house for sexual purposes?</p> <p>18 MR. PAGLIUCA: Object to form and</p> <p>19 foundation.</p> <p>20 THE WITNESS: Fifth.</p> <p>21 BY MR. CASSELL:</p> <p>22 Q. On or about March 9th, 2001, you, the</p> <p>23 Defendant in this case, Ms. Maxwell, Emmie Taylor,</p> <p>24 and Virginia flew on your private jet from Tangiers</p> <p>25 to Luton International Airport in the London, England</p>	<p>1 J. Epstein - Confidential</p> <p>2 foundation.</p> <p>3 THE WITNESS: Fifth.</p> <p>4 BY MR. CASSELL:</p> <p>5 Q. Did you meet Prince Andrew, the Duke of</p> <p>6 York, in about March of 2001 in London?</p> <p>7 A. Fifth.</p> <p>8 MR. CASSELL: I guess we'll mark this</p> <p>9 as JE3.</p> <p>10 (Plaintiff's Exhibit JE3, Photograph</p> <p>11 depicting Prince Andrew, Maxwell, and Virginia was</p> <p>12 marked for identification.)</p> <p>13 MR. CASSELL: I've got copies for</p> <p>14 opposing counsel here.</p> <p>15 MR. GOLDBERGER: Thank you.</p> <p>16 BY MR. CASSELL:</p> <p>17 Q. Showing you what's been marked as JE3. Do</p> <p>18 you have that in front of you, sir?</p> <p>19 A. Yes.</p> <p>20 Q. Do you recognize that photograph?</p> <p>21 MR. PAGLIUCA: Object to form and</p> <p>22 foundation.</p> <p>23 THE WITNESS: Fifth.</p> <p>24 BY MR. CASSELL:</p> <p>25 Q. Sir, this is a photograph depicting</p>

Page 102

1 J. Epstein - Confidential
 2 Prince Andrew, Maxwell, and Virginia all together,
 3 true?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. You took this photograph, right, sir?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Who took this photograph?
 14 A. Fifth.
 15 Q. If you look at the person on the left, the
 16 male figure in the photograph, do you see that person
 17 there?
 18 A. Yes.
 19 Q. That person has his arm around the bare
 20 midriff of a young girl, true?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Yes.
 24 BY MR. PAGLIUCA:
 25 Q. That's Prince Andrew's arm around the waist

Page 103

1 J. Epstein - Confidential
 2 of Virginia touching her bare midriff, true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. The only persons inside of Maxwell's flat
 8 at this time, in addition to you and Maxwell, were
 9 Virginia and Prince Andrew, true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Where was this photograph taken?
 15 MR. PAGLIUCA: Object to foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. This photograph was taken in Maxwell's flat
 19 in London, true?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. You immediately recognized where this
 25 picture was taken, didn't you, sir?

Page 104

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. And based on your understanding of the
 7 circumstances surround the taking -- surrounding the
 8 taking of this photograph, Ms. Maxwell would have
 9 immediately identified who was in this photograph and
 10 where it was taken, true?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Could you repeat that
 14 question? I'm sorry. Could you repeat that
 15 question?
 16 BY MR. CASSELL:
 17 Q. And based on your understanding of the
 18 circumstances surrounding the taking of this
 19 photograph, Ms. Maxwell would have immediately
 20 identified who was in this photograph, true?
 21 MR. PAGLIUCA: Same objection.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. And based on your understanding of the
 25 circumstances surrounding the taking of this

Page 105

1 J. Epstein - Confidential
 2 photograph, Ms. Maxwell would have immediately
 3 identified where this photograph was taken, true?
 4 MR. PAGLIUCA: Same objection.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. The only persons -- I think we may have
 8 already asked this. Let's see. Let me just ask this
 9 to make sure.
 10 The only persons inside of Maxwell's flat
 11 at that time, in addition to you and Maxwell, were
 12 Virginia and Prince Andrew, true?
 13 MR. PAGLIUCA: Form -- form and
 14 foundation. Asked and answered.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Prince Andrew's security detail remained
 18 outside of Maxwell's flat when this photograph was
 19 taken, true?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Shortly after this photograph was taken,
 25 you and Maxwell both observed Prince Andrew and

Page 106

1 J. Epstein - Confidential
 2 Virginia go into the room depicted in the back of the
 3 photograph, true?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. And in this photograph, you do see a room
 9 depicted in the back?
 10 A. Fifth.
 11 Q. You're taking the Fifth about what is shown
 12 in this photograph?
 13 A. I -- I can't see anything. I'm sorry.
 14 MR. GOLDBERGER: Okay. So it's -- so
 15 we're not -- we're not raising Fifth
 16 Amendment privilege.
 17 You cannot -- your answer is, you
 18 cannot see what Mr. Cassell is referring to?
 19 THE WITNESS: Correct.
 20 MR. GOLDBERGER: Okay.
 21 BY MR. CASSELL:
 22 Q. Do you see a window depicted in this
 23 photograph?
 24 A. I don't know what it is. I'm sorry.
 25 Q. Do you see a white light reflecting off of

Page 107

1 J. Epstein - Confidential
 2 a blue surface in this photograph?
 3 A. Yes.
 4 Q. Does that appear to you to be a window?
 5 A. Not necessarily, no.
 6 MR. GOLDBERGER: Why don't you just
 7 assume arguendo that -- that that -- what --
 8 what you're trying to have Mr. Epstein
 9 identify is a room, and then we can go on
 10 from there.
 11 MR. CASSELL: All right.
 12 BY MR. CASSELL:
 13 Q. That room is a bedroom in Ms. Maxwell's
 14 flat, true?
 15 MR. PAGLIUCA: Object to the form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. You and Maxwell instructed Virginia to have
 20 sex with Prince Andrew, true?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. In fact, it would be a fair assessment of

Page 108

1 J. Epstein - Confidential
 2 all the circumstances surrounding this situation to
 3 say that you forced Virginia to have sex with
 4 Prince Andrew?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. What would have happened to Virginia if she
 10 had refused to have sex with Prince Andrew?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. At the time Virginia retired to the bedroom
 16 with Prince Andrew, Maxwell was in possession and
 17 control of Virginia's U.S. pass -- passport, true?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. Who had Virginia's passport when she
 23 entered England?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 109

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. After she was inside of English territory,
 5 who main con- -- remained in control of her passport?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Virginia was 17 years old at this time,
 11 true?
 12 A. Fifth.
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Sorry. Fifth.
 16 BY MR. CASSELL:
 17 Q. It was your understanding that
 18 Prince Andrew and Virginia was retiring to this
 19 bedroom to have sex, true?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. What did you understand Virginia and
 25 Prince Andrew to be doing that evening?

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. Shortly after Prince Andrew and Virginia
 6 had sex, Virginia gave you a full report about the
 7 details of the sex, true?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Did Virginia tell you anything after this
 13 photograph was taken about Prince Andrew?
 14 MR. PAGLIUCA: Object to foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Did Prince Andrew tell you anything about
 18 what he had done with Virginia in the room?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Isn't it true, sir, that Prince Andrew
 24 thanked you for making Virginia available to him for
 25 sexual purposes?

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. What, if anything, did you do with the
 4 information that Virginia gave you after you had
 5 sex -- after she had sex with men?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Approximately the next day after this
 11 photograph was taken, you made Virginia report to you
 12 in detail about Prince Andrew's sexual preferences,
 13 true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. What, if anything, do you know about
 19 Prince Andrew's sexual preferences?
 20 MR. PAGLIUCA: Object to foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. We can go into the details if this would
 24 help refresh your memory, but isn't it true that
 25 Virginia recounted specific behavior that

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. You had previously instructed Virginia that
 7 she had to give you a full report on the details of
 8 what men like Prince Andrew did to her so that you
 9 would have blackmail material you could use, true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. What instructions, if any, had you given to
 15 Virginia about what she should say after she had sex
 16 with men?
 17 MR. PAGLIUCA: Object to foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. What did you do with the information that
 21 Virginia gave you after she had sex with men?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

1 J. Epstein - Confidential
 2 Prince Andrew requested before sexual intercourse?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. The reason you asked for a detailed review
 8 of Prince Andrew's sexual activities was so that you
 9 would have blackmail information about him, true?
 10 MR. PAGLIUCA: Object to form. Asked
 11 and answered.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Why did you ask for a detailed review of
 15 Prince Andrew's sexual activities?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. You had previously told Virginia it was
 21 part of her job to give you detailed information
 22 about the men that you and Maxwell forced her to have
 23 sex with, true?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 114

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. When Virginia had sex with men that you
 5 forced upon her, what was her job?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. What would have happened to Virginia if she
 11 had refused your request to have sex with men?
 12 MR. PAGLIUCA: Objection to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. Isn't it true, sir, that you would have
 17 threatened Virginia and, in fact, potentially harmed
 18 her if she refused to have sex with the men you
 19 provided to her?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. What kind of threats did you make against
 25 Virginia when she was with you?

Page 115

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Please describe all the threats you have
 7 ever made against Virginia.
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Have you every made threats against
 13 Virginia?
 14 A. Fifth.
 15 Q. At one point you told Virginia that you
 16 needed detailed sexual information from the men she
 17 had sex with so those men would owe you favors, true?
 18 MR. PAGLIUCA: Object to form and
 19 foundation?
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. When you provided Virginia to men to have
 23 sex, they then did owe you favors, true?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 116

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. In 2000, Virginia was approached by
 5 Maxwell, true?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Maxwell was one of the main women whom you
 11 used to procure underage girls for sexual activities,
 12 true?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. It was your understanding that Maxwell met
 18 Virginia at the Mar-a-Lago Club in Palm Beach in
 19 2000, true?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. In 2000, you were a member of the
 25 Mar-a-Lago Club, true?

Page 117

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. In 2000, Ms. Maxwell had access to the
 6 Mar-a-Lago Club, true?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. The reason Maxwell had access to the
 12 Mar-a-Lago Club in 2000 was because of your
 13 connections to the club, true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Maxwell was a primary co-conspirator in
 19 your sexual abuse scheme, true?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Maxwell was a primary co-conspirator in
 25 your sex trafficking scheme, true?

Page 118

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Maxwell herself regularly participated in
 7 your sexual exploitation of minors, true?
 8 MR. PAGLIUCA: Object to form and
 9 found.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. In 2000, Maxwell herself regularly
 13 participated in your sexual exploitation of minors,
 14 true?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. Maxwell herself regularly participated in
 20 your sexual exploitation of Virginia, true?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. Did Maxwell participate in your sexual

Page 119

1 J. Epstein - Confidential
 2 exploitation of Virginia?
 3 MR. PAGLIUCA: Object to foundation.
 4 THE WITNESS: Fifth.
 5 Can we take a break so I can stand up?
 6 MR. CASSELL: Sure.
 7 VIDEO TECHNICIAN: Off the record at
 8 10:01.
 9 (A recess was taken.)
 10 VIDEO TECHNICIAN: This is the
 11 beginning of disc two. On the record at
 12 10:08.
 13 BY MR. CASSELL:
 14 Q. Has Maxwell ever made any threats against
 15 Virginia?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. It's true, sir, that Maxwell has threatened
 21 Virginia, right?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 120

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Has Maxwell ever made any threats against
 4 other girls that you interacted with?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. It's true, sir, that Maxwell has made
 10 threats against other girls with whom you've
 11 interacted?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. Has Maxwell ever told girls that they
 17 should keep quiet about the sexual activities you
 18 have had with them?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. It's true, sir, Maxwell has made threats
 24 against girls to tell them or force -- sorry. Let me
 25 to start over.

Page 121

1 J. Epstein - Confidential
 2 It's true, sir, that Maxwell has told girls
 3 they should keep quiet about the sexual activities
 4 you had with them, right?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Has Maxwell ever told girls they should
 10 keep quiet about the sexual activities she had with
 11 them?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. It's true, sir, that Maxwell had told girls
 17 they should keep quiet about the sexual activity she
 18 had with them, right?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. What, if anything, did Maxwell tell
 24 Virginia would happen to her if she refused your
 25 demands to have sex?

Page 122

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Isn't it true, sir, that Maxwell threatened
 7 Virginia if she refused to have sex with you?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Maxwell regularly participated in your
 13 sexual exploitation of Virginia, true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Maxwell persuaded Virginia to come to your
 19 mansion in 2000, true?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Virginia was 16 years old when Maxwell
 25 persuaded her to come to your mansion, true?

Page 123

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. The fashion in which Maxwell persuaded
 7 Virginia to come to your mansion was similar to the
 8 manner in which you coerced dozens of other children
 9 to come to your mansion, true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. When Virginia be- -- sorry.
 15 When Virginia began giving you a massage,
 16 you and Maxwell turned it into a sexual encounter,
 17 true?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. You had done the same thing with many other
 23 victims, true?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 124

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. After you first sexually abused Virginia,
 5 you became enamored with her, true?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. How did you feel about Virginia after you
 11 first met her?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. With the assistance of Maxwell, you
 17 converted Virginia into what is commonly referred to
 18 as a sex slave, true?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. When you interacted with Virginia in 2000
 24 and 2001, what were you doing with her?
 25 MR. PAGLIUCA: Object to form and

Page 125

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. You sexually exploited Virginia from the
 6 summer of 2000 through about September 2002, true?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. In 2002, Virginia managed to escape to a
 12 foreign country and hide from you, true?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. In 2002, when Virginia escaped, she was
 18 also hiding from Maxwell, true?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Why would Virginia have wanted to hide from
 24 you in 2002?
 25 MR. PAGLIUCA: Object to form and

Page 126

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. Virginia was hiding from you because she
 6 was afraid of you, true?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. Virginia was hiding from Maxwell because
 12 she was afraid of Maxwell, true?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. From 2000 through 2002, you and Maxwell
 18 sexually abused Virginia in Palm Beach, Florida,
 19 true?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. From 2000 through 2002, you and Maxwell
 25 sexually abused Virginia in New York City, true?

Page 127

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. From 2000 through 2002, you and Maxwell --
 7 Maxwell sexually abused Virginia in New Mexico, true?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. From 2000 through 2002, you and Maxwell
 13 sexually abused Virginia in the U.S. Virgin Islands?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. From 2000 through 2002, you and Maxwell
 19 sexually abused Virginia on your private jet?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. You abused Virginia other places than the
 25 ones I've just mentioned, true?

Page 128

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Maxwell sexually abused Virginia in places
 7 other than the ones I just mentioned, true?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Please list all the places that you had sex
 13 with Virginia.
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Please list all the places where, to your
 19 knowledge, Maxwell had sex with Virginia.
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. You and Maxwell sexually trafficked
 25 Virginia by forcing her to have sex with politically

Page 129

1 J. Epstein - Confidential
 2 connected and financially powerful people, true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Your purpose in sending Virginia to such
 8 powerful people was to ingratiate yourself with them,
 9 true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Maxwell's purpose in sending Virginia to
 15 such powerful people was to ingratiate herself with
 16 them, true?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. The reason you and Maxwell were sending
 22 Virginia to these powerful people was for business,
 23 personal, political, and financial gain, true?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 130

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. Another reason was to gain potential
 5 blackmail information, true?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Maxwell was fully involved in sending
 11 Virginia to various powerful people for sexual
 12 purposes, true?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. And Maxwell was hoping to obtain blackmail
 18 information as well, true?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. You observed Maxwell sexually abuse
 24 Virginia in 2000, true?
 25 MR. PAGLIUCA: Object to form and

Page 131

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. You observed Maxwell sexually abuse
 6 Virginia in 2001?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. How many times have you observed Maxwell
 12 sexually abuse Virginia?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. How many times have you observed Maxwell
 18 have any form of sexual interaction with Virginia?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. One powerful individual that you and
 24 Maxwell forced Virginia to have sexual relations with
 25

Page 132

1 J. Epstein - Confidential
 2 was former -- former Harvard Law Professor,
 3 Alan Dershowitz, true?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. You and Maxwell required Virginia to have
 9 sexual relations with Dershowitz on numerous
 10 occasions while she was a minor, true?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. You and Maxwell forced Virginia to have
 16 sexual relations with Dershowitz in Florida,
 17 New York, New Mexico, and the U.S. Virgin Islands,
 18 among other places, true?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Please list all the places where you forced
 24 Virginia to have sexual relations with Dershowitz.
 25 MR. PAGLIUCA: Object to form and

Page 133

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. In addition to being a participant in the
 6 abuse of Virginia and other minors, Dershowitz was an
 7 eyewitness to the sexual abuse of many other minor
 8 girls by you and Maxwell, true?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Dershowitz was an eyewitness to the sexual
 14 abuse of many other minors by you, true?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. One way to describe Maxwell's role for you
 20 was as a madam, true?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. You've heard the term "madam" used in

Page 134

1 J. Epstein - Confidential
 2 reference to someone who is a procurer of women or
 3 other girls for sex, right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. What was Maxwell's role for you in 2000 and
 9 2001?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. What was Maxwell's role with you in 2005?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. Using the term "madam" as I had previously
 20 defined it, wouldn't it be fair to say Maxwell was a
 21 madam for you in 2000?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 135

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Wouldn't it fair to say that she was an
 4 madam for you in 2001?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Wouldn't it be fair to say that she was a
 10 madam for you in 2006?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. It would be fair to say that Maxwell
 16 assumed -- assumed a position of trust for the girls
 17 whom you sexually abused, including Virginia, true?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. You know that Maxwell had sex with dozens
 23 of underage girls, true?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 136

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. Maxwell had sex with Virginia in the U.S.
 5 Virgin Islands, New Mexico, New York, France, and
 6 many other locations, true?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. From 2000 through 2005, what kinds of
 12 pictures did you have in your Florida mansion?
 13 A. Fifth.
 14 Q. From 2000 through 2005, what kind of
 15 pictures did you have in your New York City mansion?
 16 A. Fifth.
 17 Q. From 2000 to 2005, what kinds of pictures
 18 did you have in the U.S. Virgin Islands' residence?
 19 A. Fifth.
 20 Q. Maxwell took sexually explicit pictures of
 21 many underage girls, true?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 137

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. What kinds of pictures have you seen
 4 Maxwell take?
 5 MR. PAGLIUCA: Object to foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Have you ever seen Maxwell take pictures of
 9 girls under the age of 18?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. It's true, sir, that you've seen Maxwell
 15 take many picture of girls under the age of 18, true?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. In fact, you displayed pictures of naked
 21 girls throughout your home in Florida, true?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 138

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. In fact, you displayed pictures of naked
 4 girls throughout your home in New York, true?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. In fact, you displayed pictures of naked
 10 girls throughout your home in the U.S. Virgin
 11 Islands, true?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. In fact, you displayed pictures of naked
 17 girls throughout your home in New Mexico, true?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. Tell me about all the circumstances in
 23 which you've seen Maxwell providing cameras to
 24 people.
 25 MR. PAGLIUCA: Object to form and

Page 139

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. You had Maxwell provide cameras to underage
 6 girls, true?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. Your purpose in having Maxwell provide
 12 cameras to underage girls was to have them take
 13 sexually explicit pictures of themselves, true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Have you ever seen Maxwell take a sexually
 19 explicit picture of an underage girl?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. You and Maxwell viewed together sexually
 25 explicit pictures of girls under the age of 18, true?

Page 140

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Please describe all the pictures of girls
 7 that you've seen Maxwell take.
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Now, you have interacted with Maxwell in
 13 England many times, true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. I want you to understand that the next
 19 series of questions we'll be dealing just with your
 20 actions in England, not with any of your actions in
 21 the United States.
 22 Will you understand that with regard to my
 23 next questions?
 24 A. Yes.
 25 Q. While you were in England, you directed

Page 141

1 J. Epstein - Confidential
 2 Maxwell to bring English females under the age of 18
 3 to you for sexual purposes, true?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. While in England, in Miss Maxwell's private
 9 residence, you observed Maxwell in the presence of
 10 English females under the age of 18, true?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. While in England, Ms. Maxwell brought you
 16 English females to satisfy your sexual purposes,
 17 true?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. How young were the English girls that
 23 Maxwell brought to you?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 142

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. Please describe how many times you have
 5 seen Maxwell in private locations with girls under
 6 the age of 18 in England.
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. You recognize the name Alexandra Dickson,
 12 don't you, sir?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Alexandra Dickson was an English girl
 18 recruited by Maxwell for your sexual purposes, true?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Tell me how you came to meet Alexandra
 24 Dickson in England.
 25 A. Fifth.

Page 143

1 J. Epstein - Confidential
 2 Q. When you met Alexandra Dickson, she was
 3 under the age of 18, true?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. How old was Alexandra Dickson when you
 9 first met her?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Based on your understanding of English
 15 criminal law, you have observed Maxwell commit
 16 English criminal offenses of a sexual nature in
 17 England, true?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. Have you ever observed Maxwell commit a
 23 crime in England?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 144

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. Please describe for me all the crimes you
 5 have seen Maxwell commit in England.
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. While in England, you instructed Maxwell to
 11 go to public places to solicit English girls to have
 12 sex with you in England in exchange for compensation,
 13 true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. What instructions did you give to Maxwell
 19 in England about what she should do for you?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Please describe Maxwell's interactions in
 25 England with females under the age of 18.

Page 145

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Please describe Maxwell's interactions in
 7 England with e-mails under the age of 18 with whom
 8 you had sex.
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. You have yourself solicited in public
 14 places English girls under the age of 18 to have sex
 15 with you in exchange for compensation, true?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. And just so I'm clear, you have, in
 21 England, yourself, solicited in public places English
 22 girls under the age of 18 to have sex with you in
 23 exchange for compensation, true?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 146

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. Please describe your interaction with
 5 females under the age of 18 in England.
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Please describe your interactions with
 11 females under the age of 18 with whom you have had
 12 sex in England.
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. You have had sex with females under the age
 18 of 18 in England in exchange for compensation, true?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Based on your understanding of English
 24 criminal law, you have committed domestic English sex
 25 offenses in England, true?

Page 147

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Without going into any acts you have com-
 7 -- may have committed, what is your understanding of
 8 English criminal law regarding soliciting sex?
 9 MR. PAGLIUCA: Object to foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. During the time period 2000 to 2002,
 13 Maxwell and you lived together for significant parts
 14 of those years, true?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. During the time period 2000 to 2002,
 20 Maxwell was responsible for much of the day-to-day
 21 operation of your Florida mansion, true?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 148

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Who is the person you interacted with most
 4 in the year 2000?
 5 A. Fifth.
 6 Q. Who was the person you interacted most in
 7 the year -- let me rephrase.
 8 Who is the person that you interacted with
 9 the most in 2001?
 10 A. Fifth.
 11 Q. Who is the person that you interacted the
 12 most with in 2002?
 13 A. Fifth.
 14 Q. Isn't it true, sir, that the person you
 15 interacted with most in the year 2000 was Maxwell?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. Isn't it true the person you interacted
 21 with most in the year 2001 was Maxwell?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 149

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Who did you interact the most with in the
 4 year 2005?
 5 A. Fifth.
 6 Q. Isn't it true, sir, that you interacted the
 7 most with Maxwell in the year 2005?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Who was responsible for the day-to-day
 13 operation of your Florida mansion in 2000 to 2002?
 14 MR. PAGLIUCA: Object to form and
 15 foundation. Asked and answered.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Isn't it true Maxwell was responsible for
 19 much of the day-to-day operation of your Florida
 20 mansion in 2000 to 2002?
 21 MR. PAGLIUCA: Object to form and
 22 foundation. Asked and answered.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. During the time period 2000 to 2002, you

Page 150

1 J. Epstein - Confidential
 2 were sexually -- sexually intimate with Maxwell,
 3 true?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. You have remained on friendly terms with
 9 Maxwell even through today, true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. How would you describe your relationship
 15 today with Maxwell?
 16 A. Fifth.
 17 Q. In the period 2000 to 2002, you directed
 18 Maxwell to recruit girls under the age of 18 for you
 19 to use for sexual purposes, true?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. How did you get the girls that you sexually
 25 abused in 2001 to 2002?

Page 151

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. The directions you gave Maxwell for
 7 recruiting girls for you was something to the effect
 8 of the younger the better, true?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Have you ever used the phrase "The younger
 14 the better" in the presence of Maxwell?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. It's true, sir, that you've used the phrase
 20 "The younger the better" in the presence of Maxwell,
 21 right?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 152

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. You instructed Maxwell, then -- when she
 4 was recruiting girls for you, she could bring you
 5 girls of any race except for African Americans, true?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Have you ever discussed the age of underage
 11 -- I'm sorry.
 12 Have you ever discussed the race of
 13 underage girls with Maxwell?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Why is it that you instructed Maxwell not
 19 to bring you African American girls?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. I'm now going to ask you a question --
 25 series of questions about overseas locations, and I

Page 153

1 J. Epstein - Confidential
 2 want you to understand that each of these questions
 3 is asking solely about your activities in these
 4 overseas locations, and it's not in any way asking
 5 for any information about actions that you may or may
 6 not have committed in the United States.
 7 Will you understand that with regard to
 8 these next questions?
 9 A. Yes.
 10 Q. You have an apartment in Paris, France,
 11 true?
 12 A. Fifth.
 13 Q. Maxwell has frequently been to your
 14 apartment in Paris, France, true?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. Please list all the places in the world
 20 where you have an apartment.
 21 A. Fifth.
 22 Q. While Maxwell has been at your apartment in
 23 Paris, France, you have had numerous girls under the
 24 age of 18 in your presence, true?
 25 MR. PAGLIUCA: Object to form and

Page 154

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. While she was with you in Paris, Maxwell
 6 recruited French girls under the age of 18 for to you
 7 sex with, true?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Please describe all of your interactions
 13 with underage girls -- I'm sorry.
 14 Please describe all of your interactions
 15 with girls under the age of 18 in France.
 16 A. Fifth.
 17 Q. My next series of questions, again, are
 18 only asking for your activities in the foreign
 19 country in question, and that will be Thailand.
 20 Will you understand that with regard to my
 21 next questions?
 22 A. Yes.
 23 Q. You have been to Thailand, true?
 24 A. Fifth.
 25 Q. Have you ever been to Thailand?

Page 155

1 J. Epstein - Confidential
 2 A. Fifth.
 3 Q. When you went to Thailand, Maxwell
 4 accompanied you, true?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. When you went to Thailand, who went with
 10 you?
 11 A. Fifth.
 12 Q. You saw Maxwell in the presence of Thai
 13 females under the age of 18 in Thailand, true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Describe what you did with Maxwell in
 19 Thailand.
 20 MR. PAGLIUCA: Object to foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. While in Thailand, you directed Maxwell to
 24 recruit Thai females under the age of 18 for your
 25 sexual purposes solely in Thailand, true?

Page 156

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. While in Thailand, Maxwell brought you
 7 females under the age of 18, true?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Without going into any acts that you may or
 13 may not have committed, what is your understanding of
 14 Thai criminal law regarding sex with girls under the
 15 age of 18?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. Have you ever had sex with a Thai female
 21 under the age of 18 in Thailand?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 157

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Have you ever had sex with anyone in
 4 Thailand?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Please describe all the sexual activities
 10 you had in Thailand.
 11 A. Fifth.
 12 Q. My next series of questions are with regard
 13 to the country of Brunei, and I want you to
 14 understand that these questions deal solely with your
 15 activities in Brunei. All right?
 16 A. Yes.
 17 Q. In 2002, you flew to Brunei with Maxwell on
 18 your private jet, true?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Have you ever been to Brunei?
 24 A. Fifth.
 25 Q. Have you ever been to Brunei with Maxwell?

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. You have had sex with girls from Brunei
 7 under the age of 18 in Brunei?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Please describe all the sex that you've
 13 that in Brunei.
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Maxwell helped you find girls from Brunei
 19 for you to have sex with in Brunei, true?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. What did Maxwell do in Brunei with you?
 25 MR. PAGLIUCA: Object to form and

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Please tell me about your sexual abuse in
 7 the Czech Republic of Czech's -- Czech girls under
 8 the age of 18.
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Have you ever had sex in the Czech
 14 Republic?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. Please tell me who you've had sex with in
 20 the Czech Republic.
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. Please tell me about Maxwell's involvement

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. Are you aware of inter- -- interaction by
 6 Maxwell with women in Brunei?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. Are you aware of any interaction by Maxwell
 12 with girls under the age of 18 in Brunei?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Please describe all the interactions you
 18 saw between Maxwell and girls from Brunei in Brunei.
 19 A. Fifth.
 20 Q. My next questions deal solely with your
 21 activities in the Czech Republic.
 22 Have you ever been to the Czech Republic?
 23 A. Fifth.
 24 Q. Have you ever been to the Czech Republic
 25 with Maxwell?

1 J. Epstein - Confidential
 2 in your sexual abuse of Czech girls in the Czech
 3 Republic.
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Maxwell has been to the Czech Republic with
 9 you?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. When you went to the Czech Republic, who
 15 did you meet?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. Was Maxwell ever with you when you were in
 21 the presence of girls under the age of 18 in the
 22 Czech Republic?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 162

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. It's true, sir, that Maxwell was with you
 4 when you were in the presence of girls under the age
 5 of 18 in the Czech Republic, right?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Please name all of the countries, not
 11 including the United States, where you have seen
 12 Maxwell in the presence of females who lived in those
 13 countries under the age of 18.
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Please describe for me Maxwell's sexual
 19 interactions with females under the age of 18 in
 20 foreign countries with citizens of those countries.
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. Has Maxwell ever interacted with females

Page 163

1 J. Epstein - Confidential
 2 under the age of 18 in foreign countries?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Has Maxwell ever interacted with minor
 8 girls from the former country known as
 9 Czechoslovakia?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Based on your understanding of the criminal
 15 laws of other foreign countries, have you ever
 16 committed a crime of a sexual nature in another
 17 foreign country?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. Please describe all the crimes of a sexual
 23 nature that you have committed in foreign countries.
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 164

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. Based on your understanding of the criminal
 5 laws of other countries, has Maxwell ever committed a
 6 crime of a sexual nature in another country?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. Please describe all the crimes of a sexual
 12 nature that you understand Maxwell has committed
 13 foreign countries.
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. You are a multimillionaire, true, sir?
 19 A. Fifth.
 20 Q. How much are you worth today?
 21 A. Fifth.
 22 Q. It would not be financially burdensome for
 23 you to hire someone to help collect any documents
 24 that might be needed in this case, would it?
 25 A. Fifth.

Page 165

1 J. Epstein - Confidential
 2 Q. You have millions and millions of dollars
 3 available to your disposal to satisfy any need for
 4 assistance in responding to discovery in this case,
 5 true?
 6 A. Fifth.
 7 Q. You have legions -- well, let me strike
 8 that.
 9 How many lawyers do you have working on
 10 this case for you?
 11 A. Fifth.
 12 Q. It's true that you have multiple lawyers
 13 assisting you on this case, true?
 14 A. Fifth.
 15 Q. How much are you paying your lawyers to
 16 assist you on this case?
 17 A. Fifth.
 18 MR. GOLDBERGER: And attorney-client
 19 privilege.
 20 BY MR. CASSELL:
 21 Q. You and Maxwell became what could be
 22 reasonably described as boyfriend and girlfriend in
 23 about the mid 1990s, true?
 24 MR. PAGLIUCA: Object to form and
 25 foundation. Asked and answered.

Page 166

1 J. Epstein - Confidential
2 THE WITNESS: Fifth.
3 BY MR. CASSELL:
4 Q. Since you became boyfriend and girlfriend,
5 you have given Maxwell significant amount --
6 significant amounts of money, true?
7 MR. PAGLIUCA: Object to form and
8 foundation.
9 THE WITNESS: Fifth. Let's take a
10 break.
11 VIDEO TECHNICIAN: Off the record at
12 10:34.
13 (A recess was taken.)
14 VIDEO TECHNICIAN: On the record at
15 10:44.
16 BY MR. CASSELL:
17 Q. How much money have you given Maxwell since
18 1996?
19 MR. PAGLIUCA: Object to form and
20 foundation.
21 THE WITNESS: Fifth.
22 BY MR. CASSELL:
23 Q. Since 1996, you have given Maxwell
24 significant -- significant amounts of money, true?
25 MR. PAGLIUCA: Object to form and

Page 167

1 J. Epstein - Confidential
2 foundation.
3 THE WITNESS: Fifth.
4 BY MR. CASSELL:
5 Q. For long periods of time since 1996, you
6 have paid Maxwell's living expenses, true?
7 MR. PAGLIUCA: Object to form and
8 foundation.
9 THE WITNESS: Fifth.
10 BY MR. CASSELL:
11 Q. What do you know about the payment of
12 Maxwell's living expenses since 1996?
13 MR. PAGLIUCA: Object to form and
14 foundation.
15 THE WITNESS: Fifth.
16 BY MR. CASSELL:
17 Q. Please describe all the gifts you provided
18 for Maxwell.
19 MR. PAGLIUCA: Object to form and
20 foundation.
21 THE WITNESS: Fifth.
22 BY MR. CASSELL:
23 Q. Since 1996, you have purchased expensive
24 gifts for Maxwell, true?
25 MR. PAGLIUCA: Object to form and

Page 168

1 J. Epstein - Confidential
2 foundation.
3 THE WITNESS: Fifth.
4 BY MR. CASSELL:
5 Q. Please describe any funding you provided
6 for Maxwell's charities.
7 MR. PAGLIUCA: Object to form and
8 foundation.
9 THE WITNESS: Fifth.
10 BY MR. CASSELL:
11 Q. Since 1996, you've provided significant
12 funding for Maxwell's charities, true?
13 MR. PAGLIUCA: Object to form and
14 foundation.
15 THE WITNESS: Fifth.
16 BY MR. CASSELL:
17 Q. Have you ever given Maxwell access to any
18 of your credit cards or bank accounts?
19 MR. PAGLIUCA: Object to form and
20 foundation.
21 THE WITNESS: Fifth.
22 BY MR. CASSELL:
23 Q. Since 1996, you've given Maxwell access to
24 some of your credit card and bank accounts, true?
25 MR. PAGLIUCA: Object to form and

Page 169

1 J. Epstein - Confidential
2 foundation.
3 THE WITNESS: Fifth.
4 BY MR. CASSELL:
5 Q. How did Maxwell buy her town home in
6 New York?
7 MR. PAGLIUCA: Object to form and
8 foundation.
9 THE WITNESS: Fifth.
10 BY MR. CASSELL:
11 Q. You bought Maxwell a town home in New York,
12 true?
13 MR. PAGLIUCA: Object to form and
14 foundation.
15 THE WITNESS: Fifth.
16 BY MR. CASSELL:
17 Q. What reason were you -- what reason did you
18 have for giving Maxwell gifts?
19 MR. PAGLIUCA: Object to form and
20 foundation.
21 THE WITNESS: Fifth.
22 BY MR. CASSELL:
23 Q. One of the reasons you gave Maxwell gifts
24 was so -- so that she would continue recruiting girls
25

Page 170

1 J. Epstein - Confidential
 2 for you for sex, true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Directly or indirectly, you gave Maxwell
 8 money to hire a paid image consultant named Ross Gow,
 9 true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. What do you know about an image consultant
 15 in England named Ross Gow?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. You gave Maxwell money to hire a lawyer
 21 named Phil Bard in England, true?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25 BY MR. CASSELL:

Page 171

1 J. Epstein - Confidential
 2 Q. Please tell me everything you know about a
 3 lawyer named Phil Bard in England.
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Have you ever transferred a significant
 9 amount of money to Maxwell in the last several years?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Within the last several years, you
 15 transferred \$500,000 to Maxwell, true?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. Tell me what you know about who is paying
 21 for Maxwell's attorneys now.
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 172

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Directly or indirectly you're paying for
 4 Maxwell's attorneys now, true?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Since January 1st, 2015, what things of
 10 value or money have you transferred to Maxwell?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. You have told various people that you own
 16 the Palm Beach Police Department, true?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. In the period 1999 to 2005, what kind of
 22 donations did you make to the Palm Beach Police
 23 Department or to any organization associated with the
 24 Palm Beach Police Department?
 25 A. Fifth.

Page 173

1 J. Epstein - Confidential
 2 Q. Have you ever made donations to any
 3 organizations associated with the Palm Beach Police
 4 Department?
 5 A. Fifth.
 6 Q. Have you ever used money to influence the
 7 testimony of a witness in a legal proceeding?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 (Plaintiff's Exhibit JE4, E-mail that
 12 Jeffrey Epstein sent to Maxwell on January 12th, 2015
 13 was marked for identification.)
 14 BY MR. CASSELL:
 15 Q. Let me show you what's been marked as JE4,
 16 I think, we're up to, and copies for opposing
 17 counsel.
 18 Do you have that document in front of you,
 19 sir?
 20 A. Yes.
 21 Q. Do you recognize this document?
 22 A. Fifth.
 23 Q. This is, in fact, an e-mail that you sent
 24 to Maxwell on January 12th, 2015, true?
 25 A. Fifth.

Page 174

1 J. Epstein - Confidential
 2 Q. What is this document?
 3 A. Fifth.
 4 Q. The first few words in this e-mail are,
 5 "You can issue a reward to any of Virginia's
 6 friends" -- and it appears to be acquaintances,
 7 although there's a spelling issue.
 8 Do you see that -- those first few words?
 9 A. Yes.
 10 Q. When you referred to "a reward" in this
 11 e-mail, you were referring to cash payments, true?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. What did you mean by the term "reward" in
 17 this e-mail?
 18 A. Fifth.
 19 Q. In the e-mail you said that "The strongest
 20 is the Clinton dinner."
 21 Do you see that reference in this e-mail?
 22 It's on the second line.
 23 A. Yes.
 24 Q. What did you mean by the term "strongest"
 25 in this?

Page 175

1 J. Epstein - Confidential
 2 MR. GOLDBERGER: Let me go back and
 3 clarify.
 4 The question was, do -- do you -- not
 5 that he said it, but do you see this?
 6 MR. CASSELL: That's right. No, I'm
 7 not trying to pull a fast one here. Yeah.
 8 MR. GOLDBERGER: Okay.
 9 MR. CASSELL: I just want to circle in on
 10 that word "strongest." And now I want to
 11 ask you a question that does call for his
 12 knowledge.
 13 BY MR. CASSELL:
 14 Q. What did you mean by the term "strongest"
 15 in this e-mail?
 16 A. Fifth.
 17 Q. Isn't it true, sir, that by the term
 18 "strongest," you meant that you had taken steps to
 19 conceal the presence of Bill Clinton on your island?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Isn't it true, sir, that part of what you
 25 meant by the term "strongest" is that you knew it

Page 176

1 J. Epstein - Confidential
 2 would be difficult for Virginia to find support for
 3 her testimony?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Please describe all dinners you've ever had
 9 with Bill Clinton.
 10 A. Fifth.
 11 Q. Please describe all dinners you and Maxwell
 12 have ever had with Bill Clinton.
 13 A. Fifth.
 14 Q. Please describe all dinners you, Maxwell,
 15 and Virginia have had together with Bill Clinton.
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. You have helped Maxwell feed information to
 21 the media to try to undercut Virginia's credibility,
 22 true?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 177

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Please describe all steps you've taken to
 4 assist Maxwell in getting information to the media
 5 about the circumstances surrounding this case.
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. You helped Maxwell obtain information about
 11 a Florida police report that Virginia made of a rape,
 12 true?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. How did you obtain a copy of a police
 18 report involving sexual assault on a minor,
 19 specifically Virginia?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. It's true, sir, that you did obtain a copy
 25 of a police report involving a sexual assault on

Page 178

1 J. Epstein - Confidential
 2 Virginia, true?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Have you ever helped Maxwell leak any
 8 reports to the media?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. You helped Maxwell leak a report about a
 14 sexual assault committed against Virginia when she
 15 was a minor to the media, true?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. You have been evading service of process
 21 the last few months, true, sir?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 179

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. If we wanted to serve you with legal
 4 process in the future, what would be the simplest way
 5 to do that?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Are you willing to have your attorney
 11 accept service of process on your behalf for future
 12 proceedings in this case?
 13 A. Fifth.
 14 Q. If Miss Giuffre required your testimony at
 15 trial in this case, would you be willing to appear
 16 voluntarily?
 17 A. Fifth.
 18 Q. If you are not willing to appear
 19 voluntarily at the upcoming trial, how can we serve
 20 you with process to appear?
 21 A. Fifth.
 22 Q. When was the last time you traveled
 23 overseas?
 24 A. Fifth.
 25 Q. Please describe all your overseas travel in

Page 180

1 J. Epstein - Confidential
 2 the last two years.
 3 A. Fifth.
 4 Q. How do you travel overseas?
 5 A. Fifth.
 6 Do you want this?
 7 (Plaintiff's Composite Exhibit JE5, E-mail
 8 Jeffrey Epstein received from Ms. Maxwell on about
 9 July 18th, 2009 was marked for identification.)
 10 BY MR. CASSELL:
 11 Q. Thanks. Thank you.
 12 I'm going to direct your attention now to
 13 an exhibit, which I'll mark JE5. It's a composite
 14 exhibit. I'm just looking at the first page of this
 15 composite exhibit right now.
 16 Do you see JE5, also known as Maxwell 14,
 17 in front of you, sir?
 18 A. Yes.
 19 Q. This is an e-mail you received from
 20 Ms. Maxwell on about July 18th, 2009, true?
 21 A. Fifth.
 22 Q. There's an e-mail address [REDACTED]
 23 Do you see that e-mail on this document?
 24 A. Yes.
 25 Q. You understand that to be an e-mail that

Page 181

1 J. Epstein - Confidential
 2 belonged to Ms. Maxwell, true?
 3 A. Fifth.
 4 Q. You see on this document an e-mail address
 5 known as jeevacation@Gmail.com? Do you see that
 6 notation?
 7 A. Yes.
 8 Q. That's your e-mail address, true?
 9 A. Fifth.
 10 Q. Ms. Maxwell wrote to you, "How old was
 11 Virginia in 1998 when she claims she started working
 12 for you?"
 13 Isn't that true?
 14 A. I'm sorry. What's the question?
 15 MR. PAGLIUCA: Did you see that or --
 16 THE WITNESS: Do I see that or which --
 17 I see it.
 18 BY MR. CASSELL:
 19 Q. Yeah. You see it.
 20 Isn't that true that's a sentence that
 21 Ms. Maxwell wrote to you, at least that's your
 22 understanding?
 23 A. Fifth.
 24 Q. When you received that e-mail from
 25 Ms. Maxwell, it's your understanding that Ms. Maxwell

Page 182

1 J. Epstein - Confidential
 2 was using the term "Virginia" to refer to Virginia
 3 Roberts Giuffre, right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. You see the term "Virginia" on this
 9 document?
 10 A. Yes.
 11 Q. Who do you understand that term to refer
 12 to?
 13 A. Fifth.
 14 Q. Who do you understand this e-mail to have
 15 come from?
 16 A. Fifth.
 17 Q. Who do you understand received this e-mail?
 18 A. Fifth.
 19 Q. You and Ms. Maxwell were working together
 20 to try defend the civil lawsuit that Virginia had
 21 filed against you, true?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Sorry. Say it gain.
 25

Page 183

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. You and Miss Maxwell were working together
 4 to try to defend the civil lawsuit that Virginia
 5 filed against you at this time, true?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 MR. GOLDBERGER: Against Mr. Epstein,
 9 not against Ms. Maxwell?
 10 MR. CASSELL: Correct.
 11 MR. GOLDBERGER: Thank you.
 12 THE WITNESS: Sorry. Okay.
 13 MR. CASSELL: Let me just ask --
 14 MR. GOLDBERGER: Okay.
 15 BY MR. CASSELL:
 16 Q. It's true, sir, that in July of 2009,
 17 Virginia had a lawsuit pending against you, right?
 18 A. Fifth.
 19 MR. CASSELL: And you're taking the
 20 Fifth with regard to a publicly-filed
 21 lawsuit, I understand it; is that right?
 22 MR. GOLDBERGER: That's correct.
 23 BY MR. CASSELL:
 24 Q. Did you respond to this e-mail?
 25 MR. WEINBERG: I will also assert the

Page 184

1 J. Epstein - Confidential
 2 attorney-client privilege to the extent
 3 Mr. Epstein's knowledge of the lawsuit or
 4 the date of the lawsuit emanates from the
 5 attorney-client communication.
 6 MR. GOLDBERGER: Did you not get that?
 7 THE COURT REPORTER: No.
 8 MR. GOLDBERGER: I'll -- I'll rephrase
 9 it.
 10 In addition to the Fifth Amendment
 11 privilege, we are invoking attorney-client
 12 privilege to the extent that any knowledge
 13 that Mr. Epstein has about a lawsuit filed
 14 against him by someone by the name of
 15 Virginia Roberts came to him from attorneys.
 16 BY MR. CASSELL:
 17 Q. Did you respond to this e-mail, sir?
 18 A. Fifth.
 19 Q. It's true, sir, that you responded to this
 20 e-mail, right?
 21 A. Fifth.
 22 Q. And your response was along the lines of
 23 coordinating with Maxwell as to how best to defend
 24 the lawsuit against you?
 25 MR. PAGLIUCA: Object to form and

Page 185

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 (Plaintiff's Exhibit JE6, E-mail string
 5 between Jeffrey Epstein and Ms. Maxwell on
 6 about March 25th, 2011 was marked for
 7 identification.)
 8 BY MR. CASSELL:
 9 Q. All right. Let's go to another document,
 10 which I'll mark as JE6.
 11 Do you see JE6 in front of you?
 12 A. Yes.
 13 Q. This is an e-mail string between you and
 14 Ms. Maxwell on about March 25th, 2011, right?
 15 MR. GOLDBERGER: There appears to be
 16 one e-mail only.
 17 Do you have the right exhibit?
 18 MR. CASSELL: Oh, I'm sorry. No -- are
 19 we looking at the same thing? I see one
 20 e-mail and then a second one.
 21 MR. GOLDBERGER: I'm sorry.
 22 BY MR. CASSELL:
 23 Q. This appears to be a -- an e-mail from
 24 Maxwell to you, followed by an e-mail from you to
 25 Maxwell, correct?

Page 186

1 J. Epstein - Confidential
 2 A. Fifth.
 3 Q. This is an e-mail -- well, let me see.
 4 Maxwell sent you an e-mail to the effect of
 5 "Any news on V work story? Am I right not allowed
 6 full-time employment at 15?"
 7 That's what she sent to you, right?
 8 A. I'm sorry. Do you -- is that -- are you
 9 asking me that's what it says on this document?
 10 Q. No. I'm asking you, was it your
 11 understanding that Maxwell was sending you that
 12 question, right?
 13 A. Fifth.
 14 Q. And you responded by saying, "Are you
 15 getting what you need?"
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: I'm sorry. Are you
 19 asking me if that's what it says?
 20 BY MR. CASSELL:
 21 Q. No. I'm asking, is that what you
 22 responded?
 23 A. Fifth.
 24 Q. It's true, sir, that you responded to an
 25 e-mail from Maxwell on about March 25th, 2011, right?

Page 187

1 J. Epstein - Confidential
 2 A. Fifth.
 3 Q. What did you say in response to Maxwell's
 4 question?
 5 A. Fifth.
 6 MR. CASSELL: Just so the record is
 7 clear, this is also identified as
 8 confidential GM-00649. Hang on one second.
 9 BY MR. CASSELL:
 10 Q. By the phrase "V work story," you
 11 understood Ms. Maxwell to be referring to Virginia's
 12 age at the time Maxwell first met Virginia, true?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. What did you understand the phrase "V work
 18 story" to mean?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. And by the phrase "getting what you need,"
 24 you meant getting materials to try to cover up your
 25 sexual abuse of Virginia, right?

Page 188

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. In this e-mail and other communications,
 7 you and Maxwell were trying to cover up sexual abuse
 8 of Virginia, right?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. By the phrase "getting what you need," what
 14 did you mean?
 15 A. Fifth.
 16 Q. All right. One more --
 17 A. Here you go.
 18 Q. Oh, did you instruct Maxwell to delete any
 19 e-mails at the time?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Did you instruct Maxwell to delete her
 25 e-mails in 2015?

Page 189

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 (Plaintiff's Exhibit JE7, Transcription of
 6 a string of e-mails between Jeffrey Epstein and Ms.
 7 Maxwell in about May of 2011 was marked for
 8 identification.)
 9 BY MR. CASSELL:
 10 Q. Mark this as JE6 --
 11 MR. PAGLIUCA: Seven.
 12 MR. CASSELL: Oh, seven? Thank you.
 13 Thanks, Jeff.
 14 THE WITNESS: Thank you.
 15 BY MR. CASSELL:
 16 Q. Do you have JE7 in front of you?
 17 A. Yes.
 18 Q. This is, in fact, an accurate transcription
 19 of a string of e-mails between you and Ms. Maxwell in
 20 about May of 2011?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. What is this document?

1 J. Epstein - Confidential
 2 A. Fifth.
 3 Q. As reflected in this document, you sent an
 4 e-mail on May 3rd, 2011, to Maxwell that read, "Where
 5 are you? The pictures of you look good. Don't
 6 fret."
 7 That's what you sent to her, right?
 8 A. Again, you're asking me, is that what it
 9 says on the paper?
 10 Q. No. I'm asking a substantive question.
 11 Is this what you sent to her?
 12 A. Fifth.
 13 Q. You sent that e-mail to her, didn't you?
 14 A. Fifth.
 15 Q. Who sent that e-mail to her?
 16 A. Fifth.
 17 Q. When you wrote -- wrote the words, "Don't
 18 fret," you meant that you were taking steps to avoid
 19 further distribution to press stories about your
 20 sexual abuse of Virginia, right?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. What did you mean by the words "Don't fret"

1 J. Epstein - Confidential
 2 in the e-mail?
 3 A. Fifth.
 4 We done?
 5 Q. Yeah.
 6 (Plaintiff's Exhibit JE8, E-mail that
 7 Jeffrey Epstein sent to Maxwell on January 15th, 2015
 8 was marked for identification.)
 9 BY MR. CASSELL:
 10 Q. I'm going to mark an exhibit here as JE8.
 11 Do you have JE8 in front of you?
 12 A. Yes.
 13 MR. CASSELL: It's also Maxwell 18 and
 14 also GM001081, for the record.
 15 BY MR. CASSELL:
 16 Q. This is an e-mail that you sent to Maxwell
 17 on January 15th, 2015, isn't it?
 18 A. Fifth.
 19 Q. Who sent this e-mail on January 15, 2015?
 20 A. Fifth.
 21 Q. This e-mail says, do you want [REDACTED]
 22 to come out and say she was the girlfriend, during
 23 the time period?
 24 Do you see that there?
 25 A. Yes.

1 J. Epstein - Confidential
 2 Q. What did you mean when you wrote those
 3 words?
 4 A. Fifth.
 5 Q. In fact, sir, those words mean that you
 6 wanted a person named -- strike that.
 7 In fact, what that e-mail means is that you
 8 were offering to Maxwell that a woman named [REDACTED]
 9 would pretend to be your girlfriend during the time,
 10 right?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. The reason you and Maxwell were
 16 communicating at this time was to try to work
 17 together to attack Virginia's credibility, true?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. Why were you and Maxwell communicating at
 23 this time?
 24 A. Fifth.
 25 Q. You and Maxwell were communicating to try

1 J. Epstein - Confidential
 2 an invent a story to conceal the fact that the two of
 3 you had sexually abused Virginia, right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. When you used the phrase "to come out and
 9 say," what did you mean?
 10 A. Fifth.
 11 Q. In fact, you were trying to get someone to
 12 come out to falsely claim to be your girlfriend at
 13 that time, right?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. And the reason you needed someone to say
 19 that they were your girlfriend at the time was to
 20 cover up the fact that Maxwell was your girlfriend at
 21 the time, right?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 194

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. With regard to the time period referred to
 4 in this e-mail, who was your girlfriend?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. In fact, during the time when Virginia was
 10 with you, Maxwell was your girlfriend, right?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. Who was your girlfriend when Virginia was
 16 with you?
 17 MR. PAGLIUCA: Object to form.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. Did Maxwell respond to this e-mail?
 21 A. Fifth.
 22 Q. In fact, Maxwell did respond to this
 23 e-mail, true?
 24 A. Fifth.
 25 Q. You and Maxwell decided together that

Page 195

1 J. Epstein - Confidential
 2 trying to pass off Shelly as your girlfriend who be
 3 too easily exposed as a lie, right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Please describe the plan that you and
 9 Maxwell came up with to respond to Virginia's
 10 allegations that she had been sexually abused by the
 11 two of you.
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. In fact, you two came up with a plan to try
 17 to attack Virginia's credibility, right?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. Now, if we go to 2009 -- we're done with
 23 that document.
 24 A. Okay.
 25 Q. In 2009, Ms. Giuffre, proceeding under the

Page 196

1 J. Epstein - Confidential
 2 pseudonym Jane Doe 102, filed a public lawsuit
 3 against you for sexual abuse, right?
 4 A. Fifth and attorney-client.
 5 MR. GOLDBERGER: I'll assert the
 6 attorney-client privilege for you.
 7 BY MR. CASSELL:
 8 Q. It's a matter of public record that you
 9 later settled that lawsuit, right?
 10 A. Fifth.
 11 MR. GOLDBERGER: And attorney-client
 12 privilege. And confidentiality of any
 13 agreement that may have existed.
 14 BY MR. CASSELL:
 15 Q. How much money, if any, did you pay to
 16 settle that lawsuit?
 17 A. Fifth.
 18 MR. GOLDBERGER: Attorney-client
 19 privilege and confidentiality of any
 20 agreement that may or may not have existed.
 21 BY MR. CASSELL:
 22 Q. That lawsuit involved two parties, you and
 23 Ms. Giuffre, right?
 24 A. Fifth.
 25 Q. It is you who is insisting on

Page 197

1 J. Epstein - Confidential
 2 confidentiality of the settlement of that lawsuit,
 3 right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 MR. GOLDBERGER: Attorney-client
 8 privilege.
 9 BY MR. CASSELL:
 10 Q. If Virginia were to provide to Maxwell the
 11 confidential settlement agreement, that would be, to
 12 your personal understanding, a violation of the terms
 13 of the settlement agreement?
 14 A. Fifth.
 15 MR. GOLDBERGER: And attorney-client
 16 privilege.
 17 BY MR. CASSELL:
 18 Q. You could sue Virginia if she gave Maxwell
 19 the confidential settlement agreement, right?
 20 A. Fifth.
 21 MR. GOLDBERGER: Attorney-client
 22 privilege.
 23 Do you want to give me a standing
 24 objection to attorney-client privilege on --
 25 on any of the questions concerning the

Page 198

1 J. Epstein - Confidential
 2 settlement agreement?
 3 MR. CASSELL: Yes.
 4 MR. GOLDBERGER: Okay.
 5 MR. WEINBERG: And a standing -- and a
 6 standing objection to these questions are
 7 based, if there is a confidentiality
 8 agreement, on the agreement, which is
 9 subject to confidentiality.
 10 MR. PAGLIUCA: Which I have asked for
 11 and don't have.
 12 MR. CASSELL: Right. Which is why --
 13 well, in any event.
 14 BY MR. CASSELL:
 15 Q. Sir, you are willing to sign an
 16 unconditional waiver allowing Virginia to turn over
 17 the settlement agreement to Maxwell, right?
 18 A. Fifth.
 19 Q. Now, if we talk about the 2009 litigation
 20 between you and Maxwell, during that litigation you
 21 conveyed threats to Virginia?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 199

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Indirectly you threatened Virginia with
 4 harm if she did not agree to your proposed settlement
 5 terms, true?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Without disclosing any amount that you
 11 ultimately paid, if any, it was your intent that your
 12 threats would reduce the amount that you would have
 13 to pay to Virginia, right?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Please describe all the threats you've ever
 19 made to Virginia.
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Sir, you know Harvard Law Professor, now
 25 former law professor, Alan Dershowitz?

Page 200

1 J. Epstein - Confidential
 2 A. Fifth.
 3 Q. When did you first meet Alan Dershowitz?
 4 A. Fifth.
 5 Q. It would be fair to describe
 6 Alan Dershowitz as a good friend of yours, true?
 7 A. Fifth.
 8 Q. Please describe your relationship with
 9 Alan Dershowitz.
 10 A. Fifth.
 11 Q. Alan Dershowitz has sent drafts of books he
 12 was writing for you to review, right?
 13 A. Fifth.
 14 Q. What books of Alan Dershowitz' have you
 15 read?
 16 A. Fifth.
 17 Q. What drafts of Alan Dershowitz' have you
 18 read?
 19 A. Fifth.
 20 Q. Dershowitz was your lawyer as well as your
 21 friend, right?
 22 A. Fifth.
 23 Q. Without discussing any particular
 24 attorney-client communications, what was the general
 25 type of legal work he did for you?

Page 201

1 J. Epstein - Confidential
 2 A. Fifth.
 3 MR. WEINBERG: Attorney-client
 4 privilege.
 5 MR. CASSELL: Attorney-client
 6 privilege? Oh, okay.
 7 BY MR. CASSELL:
 8 Q. When did Dershowitz first become your
 9 lawyer?
 10 MR. WEINBERG: Attorney-client
 11 privilege.
 12 MR. CASSELL: The date is
 13 attorney-client privilege?
 14 MR. WEINBERG: Yes.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. It is true, sir, that Dershowitz first
 18 became your lawyer in about 1999, right?
 19 MR. WEINBERG: Attorney-client
 20 privilege.
 21 BY MR. CASSELL:
 22 Q. Has Dershowitz ever provided business
 23 advice for you?
 24 A. Fifth.
 25 Q. Has Dershowitz ever provided you business

Page 202

1 J. Epstein - Confidential
 2 advice of a nonlegal nature?
 3 A. Fifth.
 4 Q. Have you had any business relationships of
 5 any kind with Dershowitz?
 6 A. Fifth.
 7 Q. It's true, sir, that you have had business
 8 relationships with Dershowitz, right?
 9 A. Fifth.
 10 Q. In 1999, you had business relationships
 11 with Dershowitz, true?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. When was the last time you spoke to
 17 Alan Dershowitz?
 18 A. Fifth.
 19 Q. I want to focus your attention to the time
 20 frame immediately after December 30th, 2014, when
 21 Virginia's allegations were first made in a court
 22 filing.
 23 If we talk about that time frame, did you
 24 discuss Virginia's allegations with Dershowitz?
 25 MR. GOLDBERGER: You got it, Marty, or

Page 203

1 J. Epstein - Confidential
 2 I'll -- I'm on -- why don't I just do it,
 3 because they're having a hard time hearing
 4 you.
 5 MR. WEINBERG: Okay.
 6 MR. GOLDBERGER: Thank you. And
 7 attorney-client privilege.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. You did discuss Virginia's allegations with
 11 Dershowitz, didn't you?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 MR. GOLDBERGER: And attorney-client
 16 privilege.
 17 BY MR. CASSELL:
 18 Q. Was he your lawyer at that time, sir?
 19 A. Fifth.
 20 MR. GOLDBERGER: Attorney-client
 21 privilege.
 22 BY MR. CASSELL:
 23 Q. Was he your agent at that time?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 204

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 MR. GOLDBERGER: Attorney-client
 4 privilege to the extent I understand what
 5 "agent" means.
 6 BY MR. CASSELL:
 7 Q. Did you authorize Dershowitz to make any
 8 public statements on your behalf?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 MR. GOLDBERGER: Attorney-client
 12 privilege.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. If Dershowitz made any public statements
 16 about your views on Virginia, were those authorized?
 17 MR. GOLDBERGER: Attorney-client
 18 privilege?
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. Did you ever tell Dershowitz that you were
 22 outraged by Virginia's statements?
 23 A. Fifth.
 24 MR. GOLDBERGER: Attorney-client
 25 privilege.

Page 205

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. In fact, sir, you've never told Dershowitz
 4 that you were outraged by Virginia's statements, did
 5 you?
 6 A. Fifth.
 7 MR. GOLDBERGER: And attorney-client
 8 privilege.
 9 BY MR. CASSELL:
 10 Q. The reason you never told Dershowitz that
 11 is that you knew that Virginia's statements were
 12 true, didn't you?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. When Alan Dershowitz said, "He's as
 18 outraged as I am," referring to you, that was not a
 19 true statement, was it?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 MR. GOLDBERGER: And attorney-client
 24 privilege.
 25

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Was that an authorized statement on your
 4 behalf by Alan Dershowitz?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 MR. GOLDBERGER: Attorney-client
 9 privilege.
 10 BY MR. CASSELL:
 11 Q. In 2000 and 2001, Dershowitz came to visit
 12 you at your Florida mansion in Palm Beach, true?
 13 A. Fifth.
 14 MR. GOLDBERGER: Attorney-client
 15 privilege.
 16 BY MR. CASSELL:
 17 Q. In 2000 and 2001, Dershowitz came to visit
 18 you in your New York mansion, true?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 MR. GOLDBERGER: Attorney-client
 23 privilege.
 24 BY MR. CASSELL:
 25 Q. In 2001 and 2001, Dershowitz visited your

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Has Dershowitz ever walked into a room
 4 where you and Virginia were interacting sexually?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. It's true, sir, that Dershowitz did walk
 10 into a room and when you Virginia were interacting
 11 sexually, right?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. Please describe the circumstances
 17 surrounding Dershowitz walking into a room with you
 18 and Virginia interacting sexually.
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Your sexual preference is for minor girls,
 24 right?
 25 MR. PAGLIUCA: Object to form and

1 J. Epstein - Confidential
 2 ranch named Zorro in the Greater Santa Fe, New Mexico
 3 area several times, true?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 MR. GOLDBERGER: Attorney-client
 8 privilege.
 9 BY MR. CASSELL:
 10 Q. In 2000 and 2001 Dershowitz visited your
 11 island in the U.S. Virgin Islands as well, true?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 MR. GOLDBERGER: Attorney-client.
 16 BY MR. CASSELL:
 17 Q. If we focus in on the years 2000 and 2001,
 18 how many times did Dershowitz visit you in your
 19 various homes?
 20 A. Fifth.
 21 Q. Please describe all your interactions with
 22 Dershowitz in 2000 and 2001.
 23 A. Fifth.
 24 MR. GOLDBERGER: Attorney-client
 25 privilege.

1 J. Epstein - Confidential
 2 foundation. Asked and answered.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. If we focus in on the period just 2005 to
 6 2006, at that time, you were targeting minor girls
 7 for sexual abuse, true?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. If we focus in just on the year 2005, in
 13 that year you were targeting minor girls for sexual
 14 abuse, right?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. Your sexual abuse came to the attention of
 20 law enforcement authorities in 2005, right?
 21 A. Fifth.
 22 Q. And thereafter your defense attorneys
 23 negotiated a non-prosecution agreement for you with
 24 the U.S. Attorney's Office, true?
 25 A. Fifth.

Page 210

1 J. Epstein - Confidential
 2 MR. GOLDBERGER: And attorney-client
 3 privilege.
 4 BY MR. CASSELL:
 5 Q. One of the attorneys negotiating on your
 6 behalf was Alan Dershowitz, true?
 7 A. Fifth.
 8 MR. GOLDBERGER: Attorney-client.
 9 (Plaintiff's Exhibit JE9, Document 361-46
 10 on the public record in the case Jane Doe versus
 11 United States 908CD80736 in the Southern District of
 12 Florida, a document signed by Gerald Lefcourt and
 13 Alan Dershowitz was marked for identification.)
 14 BY MR. CASSELL:
 15 Q. I want to show you now an exhibit which
 16 we'll mark as JE9, which I'll note, for the record,
 17 is Document 361-46 on the public record in the case
 18 Jane Doe versus United States 908CD80736 in the
 19 Southern District of Florida.
 20 This is a document signed by
 21 Gerald Lefcourt and Alan Dershowitz, as you can see
 22 on the last page.
 23 A. I see the last page.
 24 Q. All right. This was a statement sent on
 25 your behalf to prosecutors in that -- in the criminal

Page 211

1 J. Epstein - Confidential
 2 investigation and case in the Southern District of
 3 Florida, right?
 4 A. I'm sorry. Say again.
 5 Q. This is a document or a statement sent on
 6 your behalf to prosecutors in the criminal
 7 investigation and case in the Southern District of
 8 Florida?
 9 A. That's what it says.
 10 Q. If Alan Dershowitz were to write in this
 11 letter that "Epstein never targeted minors," that
 12 would be a false statement, wouldn't it?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. In fact, you had told Alan Dershowitz that
 18 you had targeted minors?
 19 MR. WEINBERG: Attorney-client privilege.
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. And without regard to any communications
 25 that you may or may not have had with Mr. Dershowitz,

Page 212

1 J. Epstein - Confidential
 2 Mr. Dershowitz had observed you having sexual
 3 interactions with at least one minor --
 4 MR. PAGLIUCA: Object to form --
 5 BY MR. CASSELL:
 6 Q. -- at the time you wrote this letter,
 7 right?
 8 MR. PAGLIUCA: I'm sorry. I don't know
 9 if I spoke over you the last --
 10 Did you get the question?
 11 THE COURT REPORTER: No -- yes, but...
 12 Objection --
 13 MR. PAGLIUCA: Okay. Yeah.
 14 Object to form and foundation.
 15 THE COURT REPORTER: Thank you.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Two of the attorneys in the U.S. Attorney's
 19 Office at that time were Matthew Menchel and
 20 Andrew Lurie, true?
 21 A. That's what it says on the document.
 22 Q. And you also -- you knew that there were
 23 two U.S. Attorneys in the office at that time by the
 24 name of Matthew Menchel and Andrew Lurie, right?
 25 A. Fifth.

Page 213

1 J. Epstein - Confidential
 2 MR. GOLDBERGER: And attorney-client
 3 privilege.
 4 MR. CASSELL: Attorney-privilege of
 5 prosecutors?
 6 MR. GOLDBERGER: Of what he knew.
 7 MR. CASSELL: Okay. I got you.
 8 BY MR. CASSELL:
 9 Q. While you were negotiating with the U.S.
 10 Attorney's Office, you were also working with Menchel
 11 and Lurie to help them secure lucrative employment
 12 when they left the office, right?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. What do you know about the current
 18 employment of Matthew Menchel?
 19 A. Fifth.
 20 Q. What do you know about the current
 21 employment of Andrew Lurie?
 22 A. Fifth.
 23 Q. Please describe all of the circumstances
 24 you are aware of concerning Matthew Menchel's
 25 departure from the U.S. Attorney's Office.

Page 214

1 J. Epstein - Confidential
 2 A. Fifth.
 3 Q. Please describe all the circumstances you
 4 are aware of involving the departure of Andrew Lurie
 5 from the U.S. Attorney's Office.
 6 A. Fifth.
 7 Q. One person you sexually trafficked Virginia
 8 to was then Harvard Law Professor Allan Dershowitz,
 9 right?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. You arranged for Dershowitz to sexually
 15 abuse Virginia in your Florida mansion, right?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. All right. You arranged for Dershowitz to
 21 sexually abuse Virginia in your New York mansion,
 22 right?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 215

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. You arranged for Dershowitz to sexually
 4 abuse Virginia at your New -- New Mexico ranch,
 5 right?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. You arranged for Dershowitz to sexually
 11 abuse Virginia Tryland (phonetic) in the U.S. Virgin
 12 Islands, true?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. You arranged for Dershowitz to sexually
 18 abuse Virginia on the jet airplane you own, right?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. By the way, without any regard to sexual
 24 conduct that you may or may not have had on your jet,
 25 is your jet equipped with a bed?

Page 216

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Please describe the bed on your jet.
 7 A. Fifth.
 8 Q. Please describe every time Dershowitz was
 9 inside your -- one of your homes in the presence of
 10 girls under the age of 18.
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. Maxwell was well aware of Dershowitz's
 16 sexual abuse of Virginia, right?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. Please describe all the interactions
 22 between Dershowitz and Maxwell in your homes in the
 23 time frame 2000 to 2001.
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 217

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. Please describe all the interactions
 5 between Maxwell and Dershowitz in any of your homes
 6 in the time frame 2004 to 2006.
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. You have sexually trafficked Virginia to a
 12 number of your other friends, right?
 13 MR. PAGLIUCA: Object to form and
 14 foundation. Asked and answered.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. You and Maxwell sent Virginia to have sex
 18 with Glenn Dubin, true?
 19 A. Yes.
 20 Q. You and Maxwell sent Virginia to have sex
 21 with Bill Richardson, true?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. You and Maxwell sent Virginia to have sex
 4 with [REDACTED] true?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. You and Maxwell sent Virginia to have sex
 10 with Marvin Minsky, true?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. You and Maxwell sent Virginia to have sex
 16 with [REDACTED], true?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. You and Maxwell sent Virginia to have sex
 22 with [REDACTED], true?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. How did Bill Clinton get to your island
 4 when he came to visit you?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Sir, isn't it true, Bill Clinton got to the
 10 island by having Maxwell fly him there on a
 11 helicopter?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. Do you own a helicopter, sir?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. In fact, sir, you own a helicopter in the
 22 U.S. Virgin Islands for purposes of flying guests to
 23 your private island there, right?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Please give me the names of the other men
 4 you and Maxwell sent Virginia to have sex with.
 5 MR. PAGLIUCA: Object to the form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Isn't it true that in the time period 2000
 10 to 2001, you were close friends with Bill Clinton?
 11 A. Fifth.
 12 Q. And even into 2002 you remained close
 13 friends with Bill Clinton, right?
 14 A. Fifth.
 15 Q. Bill Clinton flew on your jet a number of
 16 times in 2002, right?
 17 A. Fifth.
 18 Q. For example, in May of 2002, Bill Clinton
 19 was on your jet several times, right?
 20 A. Fifth.
 21 Q. Bill Clinton visited your island in the
 22 U.S. Virgin Islands in about 2002, true?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. Please describe all the ways people can get
 5 to your private island in the U.S. Virgin Islands.
 6 MR. PAGLIUCA: Object to form.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Maxwell frequently flew a helicopter in the
 10 U.S. Virgin Islands, right?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. Maxwell was trained to fly your helicopter
 16 in the U.S. Virgin Islands, right?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. Maxwell frequently flew a helicopter in the
 22 U.S. Virgin Islands, right?
 23 MR. PAGLIUCA: Object to form and
 24 foundation. Asked and answered.
 25 THE WITNESS: Fifth.

Page 222

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. When Bill Clinton visited your private
 4 island in the U.S. Virgin Islands, please describe
 5 all the steps that you took to conceal his presence
 6 there.
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. When Bill Clinton came to your private
 12 island in the U.S. Virgin Islands, please describe
 13 anyone who he was accompanied by.
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. When Bill Clinton came to your island, he
 19 was accompanied by two young women who were
 20 approximately 18 years old, true?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. Please list every place you and

Page 223

1 J. Epstein - Confidential
 2 Bill Clinton have ever been together.
 3 MR. PAGLIUCA: Object to form.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Please list everyplace you, Maxwell, and
 7 Bill Clinton have been together simultaneously.
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. On May 22nd, 2002, you and Maxwell flew
 13 with Bill Clinton on your private jet, true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. On May 22nd, 2002 you and Maxwell and
 19 Bill Clinton flew from the Atsugi Naval Air facility
 20 in Japan to Khabarovsk, Russia, true?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. On that same trip you, Maxwell, and

Page 224

1 J. Epstein - Confidential
 2 Bill Clinton flew to China, right?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. And you also flew to Singapore, right?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. And you also flew together to Bangkok?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Just so we're clear on that, in May
 18 of 2002, you, Bill Clinton, and Defendant Maxwell all
 19 flew to Bangkok together, right?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. And later, on that same trip, you, Maxwell,
 25 and Bill Clinton all flew to Brunei together, true?

Page 225

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. You've heard of the Clinton Foundation,
 7 right?
 8 A. Fifth.
 9 Q. Please describe all of your interactions
 10 with the Clinton Foundation.
 11 A. Fifth.
 12 Q. Is it true you that you helped Bill Clinton
 13 organize the Clinton Foundation?
 14 A. Fifth.
 15 Q. Did you discuss with Bill Clinton the idea
 16 of creating a foundation?
 17 A. Fifth.
 18 (Plaintiff's Exhibit JE10, Subpoena in this
 19 case for Jeffrey Epstein to appear at deposition was
 20 marked for identification.)
 21 MR. CASSELL: I'm going to hand you one
 22 more -- here we are. This will become JE10 in
 23 this case. And I represent this is the subpoena
 24 in this case to appear for the deposition. I
 25 only got one of those.

Page 226

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: I can share. That's
 3 fine.
 4 BY MR. CASSELL:
 5 Q. Have you seen this document before today,
 6 sir?
 7 A. Fifth.
 8 Q. I want to direct your attention to page 8
 9 of this document regarding -- you see page 8?
 10 A. Yes, sir.
 11 Q. And you see there's the heading "Documents
 12 to Be Produced Pursuant to This Subpoena"?
 13 A. Yes.
 14 Q. Did you bring any documents with you today
 15 pursuant to this subpoena?
 16 A. Fifth.
 17 MR. WEINBERG: Mr. Epstein would assert
 18 the Fifth Amendment as well as the act of
 19 production for the protections against
 20 responding to that question or producing any
 21 documents, relying on the Supreme Court
 22 decision in Hubble, the Second Circuit's
 23 August 1 decision in Greenfield.
 24 MR. CASSELL: Understood. And I'll assume
 25 you have a standing objection based on the

Page 227

1 J. Epstein - Confidential
 2 grounds that you just described to all my
 3 questions with regard to this subpoena.
 4 MR. GOLDBERGER: Just so we're clear,
 5 the Fifth Amendment objection as to act of
 6 production is going to apply to
 7 everything that --
 8 MR. CASSELL: Yeah. We disagree. But
 9 I understand you have a Fifth Amendment and
 10 act of production.
 11 MR. GOLDBERGER: Yes.
 12 MR. CASSELL: Let's just hang onto that
 13 a second.
 14 MR. GOLDBERGER: Sure.
 15 BY MR. CASSELL:
 16 Q. Sir, you've made no effort to collect any
 17 of the documents requested here, right?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth Amendment.
 21 BY MR. CASSELL:
 22 Q. In the last three weeks, you've made no
 23 search at all for the 22 categories of documents
 24 requested here, right?
 25 MR. PAGLIUCA: Object to form and

Page 228

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. Where are the documents covered by these 22
 6 requested categories?
 7 A. Fifth.
 8 Q. You have not produced any privilege log for
 9 these items, have you?
 10 A. Fifth.
 11 Q. It would not be burdensome for you to
 12 search for any of these documents, would it?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. It would be quite simple for you to run
 18 search terms, such as Virginia, through your e-mail
 19 accounts, right?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. And you have plenty of money to fund any of
 25 the searches that would be required to produce these

Page 229

1 J. Epstein - Confidential
 2 documents, right?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. I want to direct your attention to the
 8 item 13, which requests all --
 9 A. Sorry --
 10 MR. GOLDBERGER: Page 9 of the -- of
 11 the subpoena.
 12 THE WITNESS: Okay.
 13 BY MR. CASSELL:
 14 Q. -- which request all telephone records
 15 associated with you, including cell phone records,
 16 from 1999 to present that shown communications with
 17 Maxwell, Ghislaine Maxwell.
 18 You've taken no steps to secure those
 19 documents, right?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. You have, in fact, received electronic and
 25 paper records from a cellular telephone provider

Page 230

1 J. Epstein - Confidential
 2 reflecting such calls on your cell phone, right?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. And on those records over the last
 8 20 months would be telephone calls between you and
 9 Maxwell, right?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. I'm going to direct your attention now to
 15 item seven.
 16 You have documents relating to
 17 communications with Ghislaine Maxwell, true, sir?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. You maintain various e-mail accounts,
 23 right?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 231

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. You have undertaken no steps to search your
 5 e-mail accounts for communications with Ms. Maxwell,
 6 right?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. It would be a simple task for you to search
 12 your e-mail accounts for documents associated with
 13 communications with Maxwell, right?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. You have seen Ms. Maxwell commit crimes,
 19 right?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Miss Maxwell has discussed with you crimes
 25 she has committed, right?

Page 232

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Please describe all the communications
 7 you've had with Maxwell about crimes she has
 8 committed.
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Ms. Maxwell has admitted to you that she
 14 has sexually abused minors, right?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. You know a Renaldo Rizzo, right?
 20 A. Fifth.
 21 Q. You know that Renaldo Rizzo is an estate
 22 manager for Glenn Dubin, right?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 233

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Who is Renaldo Rizzo?
 4 A. Fifth.
 5 Q. In about 2005, it's true, sir, that Rizzo
 6 observed you and Maxwell in the presence of a --
 7 presence of a 15-year-old Swedish girl named
 8 Caroline, right?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Please describe everything you know about a
 14 15-year-old Swedish girl named Caroline that you
 15 interacted with in 2005?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. You and Maxwell brought Caroline over to
 21 the United States under false pretenses, right?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 234

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. How did you and Maxwell convince Caroline
 4 to come over from Sweden?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. The reason you and Maxwell brought Caroline
 10 over from Sweden was to have sex with you, right?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. Did Caroline want to have sex with you?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. What did you do to Caroline when she
 21 refused to have sex with you?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 235

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. What did Maxwell do to Caroline when you
 4 refused -- when she refused to have sex with you?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. Isn't it true, sir, that you tried to force
 10 Caroline to have sex with you?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. And isn't it true you coordinated with
 16 Maxwell to try to force Caroline to have sex with
 17 you?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. Who held Caroline's passport when she came
 23 over from Sweden?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 236

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. Isn't it true, sir, that Maxwell held
 5 Caroline's passport?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Isn't it true, sir, that Maxwell was
 11 denying Caroline access to her passport in order to
 12 try to force her to have sex with you?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Why was Maxwell holding onto Caroline's
 18 passport?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. What devices did you use -- try to use --
 24 strike that.
 25 How did you try to force this 15-year-old

Page 237

1 J. Epstein - Confidential
 2 girl to have sex with you?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Was Rizzo present at a time when you were
 8 petting like a cat a girl who was a pre-teenage girl?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Please describe all the times in which you
 14 have petted like a cat pre-teenage girls.
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. Was Rizzo present when you had a young girl
 20 on your lap?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. Rizzo was telling the truth when he says

Page 238

1 J. Epstein - Confidential
 2 you were petting a girl like a cat, wasn't he?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. You and Ms. Maxwell have had sex with a
 8 woman named Johanna Sjorberg, right?
 9 MR. PAGLIUCA: Object to the form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Please describe all of your interactions
 14 with Johanna Sjorberg.
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. Please describe all of Miss Maxwell's inter
 20 actions with Johanna Sjorberg.
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. Sir, it's true that Ms. Maxwell lured

Page 239

1 J. Epstein - Confidential
 2 Sjorberg from her school under the guise of needing
 3 someone to answer phones, right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. When Miss Maxwell first interacted with
 9 Sjorberg, Maxwell's real purpose was to try to get
 10 Sjorberg to have sex with you, right?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. In 2005, Maxwell was around your Florida
 16 mansion frequently, right?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. Tell me everything you know about a man
 22 name Tony Figueroa.
 23 A. Fifth.
 24 Q. You asked a man named Tony Figueroa to
 25 arrange for underage girls to come over to your home

Page 240

1 J. Epstein - Confidential
 2 for sexual purposes, right?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Ms. Maxwell helped to coordinate the
 8 arrival of girls that Figueroa brought over to your
 9 house, right?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Please describe all interactions that you
 15 are aware of between Ms. Maxwell and Tony Figueroa.
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. You've had sex with a girl named
 21 [REDACTED] right?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 241

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Who is [REDACTED]
 4 A. Fifth.
 5 Q. You had sex with [REDACTED] when she was
 6 under the age of 18, right?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. Ms. Maxwell arranged for you to have sex
 12 with [REDACTED] when she was under the age of 18,
 13 right?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Please describe the circumstances that led
 19 you to have sex with [REDACTED].
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. Please describe all interactions between
 25 [REDACTED] and Ghislaine Maxwell.

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. You've had sex with a female named
 7 [REDACTED] when she was under the age of 18, right?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Please describe all of your interactions
 13 with [REDACTED].
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Please describe all of Maxwell's
 19 interactions with [REDACTED].
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. It would be a fair description to say that
 25 you and Maxwell were grooming [REDACTED] to be a sex

1 J. Epstein - Confidential
 2 testify, she would have to testify that she is aware
 3 of sexual abuse by you of minor girls, right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Does [REDACTED] have any knowledge of your
 9 sexual abuse of underage girls?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. It's true, sir, that [REDACTED] does have
 15 knowledge that you sexually abused underage girls,
 16 right?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. It's true, sir, that [REDACTED] has
 22 knowledge that Maxwell was involved in the sexual
 23 abuse of underage girls?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

1 J. Epstein - Confidential
 2 slave for you, right?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Why were you and Maxwell interacting with
 8 [REDACTED]
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Both you and Maxwell have had sex with
 14 [REDACTED] right?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. You remain on friendly terms with
 20 [REDACTED] right?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. If [REDACTED] were to appear at trial and

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. To your knowledge, what does Maxwell -- I'm
 5 sorry.
 6 To your knowledge, what does [REDACTED]
 7 know about Maxwell's sexual abuse of underage girls?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Sir, you are aware that in about January
 13 of 2015, Maxwell told the media that Virginia's
 14 allegations about sexual abuse were obvious lies,
 15 right?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. In fact, you are not aware of any
 21 significant thing that Virginia has said, which is an
 22 obvious lie, right?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Please list any lies that, sitting here
 4 today, you're aware of that Virginia has ever told.
 5 A. Fifth.
 6 Q. You're unwilling to identify any lies that
 7 Virginia has ever told, right?
 8 A. Fifth.
 9 Q. In fact, you are unable to list any
 10 significant lies that Virginia has ever told?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. Without regard to any sexual abuse that you
 16 may or may not have committed in the past, do you
 17 agree that it is psychologically harmful for an adult
 18 male to have sex with a minor female?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. What sort of psychological impact do you
 24 think it would have for a 40-year-old man to have sex
 25 with a 17-year-old girl?

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. What kind of psychological impact do you
 7 think it would have for a 40-year-old -- a man in his
 8 40s to have sex with a 16-year-old girl?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. You would agree that calling someone a liar
 14 when they're telling the truth can cause
 15 psychological harm, right?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. What kind of impact would calling someone a
 21 liar when they are actually telling the truth?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. You know Virginia Roberts, right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Based on your interactions with
 9 Virginia Roberts, what sort of psychological impact
 10 do you think it had when she was called a liar by
 11 Maxwell?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. It would have a significant psychological
 17 harm on Virginia Roberts for Maxwell to call her a
 18 liar about true statements, right?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Please tell me everything you know about
 24 Nadia Marcinkova.
 25 A. Fifth.

1 J. Epstein - Confidential
 2 Q. Please tell me everything you know about
 3 Sarah Kellen.
 4 A. Fifth.
 5 Q. Both you and Maxwell have had sex with
 6 Nadia Marcinkova, right?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10
 11 BY MR. CASSELL:
 12 Q. Both you and Maxwell have had sex with
 13 Sarah Kellen?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Please describe the role that Sarah Kellen
 19 played in your sex trafficking organization.
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. What did Sarah Kellen do for you in 2005?
 25 MR. PAGLIUCA: Object to form and

1 J. Epstein - Confidential
2 foundation.
3 THE WITNESS: Fifth.
4 BY MR. CASSELL:
5 Q. In the years 2000 and 2001, what did
6 Sarah Kellen do for you?
7 MR. PAGLIUCA: Object to form and
8 foundation.
9 THE WITNESS: Fifth.
10 BY MR. CASSELL:
11 Q. It's true, sir, that in 2000 and 2001
12 Sarah Kellen assisted you in recruiting girls for
13 sexual purposes, right?
14 MR. PAGLIUCA: Object to form and
15 foundation.
16 THE WITNESS: Fifth.
17 BY MR. CASSELL:
18 Q. In 2000 and 2001, Nadia Marcinkova assisted
19 you in obtaining girls for sexual purposes, true?
20 MR. PAGLIUCA: Object to form and
21 foundation.
22 THE WITNESS: Fifth.
23 BY MR. CASSELL:
24 Q. Who did Nadia Marcinkova report to when she
25 worked for you?

1 J. Epstein - Confidential
2 MR. PAGLIUCA: Object to form and
3 foundation.
4 THE WITNESS: Fifth.
5 BY MR. CASSELL:
6 Q. Sarah Kellen and Nadia Marcinkova are aware
7 of your sexual abuse of underage girls, right?
8 MR. PAGLIUCA: Object to form and
9 foundation.
10 THE WITNESS: Fifth.
11 BY MR. CASSELL:
12 Q. Have you ever discussed the lawful age of
13 consent with Ghislaine Maxwell?
14 MR. PAGLIUCA: Object to form and
15 foundation.
16 THE WITNESS: Fifth.
17 BY MR. CASSELL:
18 Q. What is your understanding of the age of
19 consent in Florida?
20 MR. PAGLIUCA: Object to form and
21 foundation.
22 THE WITNESS: Fifth.
23 BY MR. CASSELL:
24 Q. You've discussed the age of consent in
25 Florida with Maxwell, right?

1 J. Epstein - Confidential
2 MR. PAGLIUCA: Object to form and
3 foundation.
4 THE WITNESS: Fifth.
5 BY MR. CASSELL:
6 Q. Nadia Marcinkova reported to
7 Ghislaine Maxwell when she worked for you, right?
8 MR. PAGLIUCA: Object to form and
9 foundation.
10 THE WITNESS: Fifth.
11 BY MR. CASSELL:
12 Q. Who did Sarah Kellen report to when she
13 worked for you?
14 MR. PAGLIUCA: Object to form and
15 foundation.
16 THE WITNESS: Fifth.
17 BY MR. CASSELL:
18 Q. Sarah Kellen reported to Ghislaine Maxwell
19 when she worked for you, right?
20 MR. PAGLIUCA: Object to form and
21 foundation.
22 THE WITNESS: Fifth.
23 BY MR. CASSELL:
24 Q. Sarah Kellen and Nadia Marcinkova sexually
25 abused under age girls in your presence, right?

1 J. Epstein - Confidential
2 MR. PAGLIUCA: Object to form and
3 foundation.
4 THE WITNESS: Fifth.
5 BY MR. CASSELL:
6 Q. What are the circumstances surrounding your
7 discussions with Maxwell of the age of consent in
8 Florida?
9 MR. PAGLIUCA: Object to form and
10 foundation.
11 THE WITNESS: Fifth.
12 BY MR. CASSELL:
13 Q. In fact, you and Maxwell were discussing
14 the age of consent in Florida to try to make it
15 appear as though you were having sex with girls who
16 are above the age of consent other than below the age
17 of consent?
18 MR. PAGLIUCA: Object to form and
19 foundation.
20 THE WITNESS: Fifth.
21 BY MR. CASSELL:
22 Q. Have you ever threatened
23 Alfredo Rodriguez?
24 MR. PAGLIUCA: Object to form and
25 foundation.

Page 254

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. In fact, you arranged for Alfredo Rodriguez
 5 to be threatened by Maxwell, right?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. In 2009, your attorneys attended a
 11 deposition of Alfredo Rodriguez, right?
 12 A. Fifth.
 13 Q. At that time, it was in your interest to
 14 limit the ways in which Rodriguez could expose the
 15 sex abuse of both you and Maxwell, right?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. When Rodriguez was describing Maxwell's
 21 involvement with underage girls, your attorneys had
 22 an interest in attacking that testimony, right?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 MR. WEINBERG: Attorney-client

Page 255

1 J. Epstein - Confidential
 2 privilege.
 3 THE WITNESS: Fifth.
 4 MR. WEINBERG: If the information came
 5 from attorneys.
 6 MR. CASSELL: Could we take a short
 7 break at this time?
 8 VIDEO TECHNICIAN: Off the record at
 9 11:35.
 10 (A recess was taken.)
 11 VIDEO TECHNICIAN: Beginning of disc
 12 three. On the record at 11:50.
 13 BY MR. CASSELL:
 14 Q. Sir, I want to represent to you that on
 15 about January 2nd, 2015, Defendant Maxwell released a
 16 statement that said, "The allegations made by
 17 Virginia Roberts against Ghislaine Maxwell are
 18 untrue."
 19 That was a false statement, right?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. In fact, the allegations made by
 25 Virginia Roberts against Ghislaine Maxwell were true?

Page 256

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Allegations Virginia made had never been
 7 shown to be untrue, had they?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. I'll represent to you that Ms. Maxwell
 13 released a statement that said, "Each time the story
 14 is retold it changes with new salacious details about
 15 public figures and world leaders." And then there's
 16 some additional language.
 17 You had, in fact, sexually trafficked
 18 Virginia to public figures?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. In fact, you had trafficked Virginia to
 24 world leaders, right?
 25 MR. PAGLIUCA: Object to form and

Page 257

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. And Maxwell had assisted you in trafficking
 6 Virginia to public figures and world leaders?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. Please describe the public figures you and
 12 Maxwell and Virginia interacted with.
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Please describe the world leaders you and
 18 Virginia and Maxwell interacted with.
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. I represent to you that around January 2nd,
 24 2015, Ms. Maxwell released this statement that
 25 "Ms. Roberts' claims are obvious lies and should be

1 J. Epstein - Confidential
 2 treated as such." Then there's some additional
 3 language.
 4 That statement by Ms. Maxwell was, in fact,
 5 itself an obvious lie, right?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Miss Maxwell's reference to "obvious lies"
 11 was inaccurate, right?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. In fact, given your detailed knowledge of
 17 all the circumstances of the case, you know that that
 18 was an obvious lie by Maxwell, right?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Is it true that Ms. Roberts' claims are
 24 obvious lies?
 25 MR. PAGLIUCA: Object to form and

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. In fact, it is not true that Ms. Roberts'
 6 claims are obvious lies?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 BY MR. CASSELL:
 10 Q. Answer?
 11 A. You didn't ask me a question.
 12 Q. In fact, it is not true that Ms. Roberts'
 13 claims are obvious lies, right?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Prince Andrew visited your New York
 19 mansion, right?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. That visit occurred shortly after the
 25 events depicted in the photograph we looked at

1 J. Epstein - Confidential
 2 earlier?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. So that would have been in about March or
 8 April of 2001 that Prince Andrew visited you in your
 9 New York mansion?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Has Prince Andrew ever visited you in your
 15 New York mansion?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. When Prince Andrew visited you in your New
 21 York Mansion, Maxwell was there, right?
 22 A. Fifth.
 23 Q. Who was in your New York mansion when
 24 Maxwell -- I'm sorry, when Prince Andrew visited?
 25 MR. PAGLIUCA: Object to form and

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. Prince Andrew interacted with Virginia in
 6 your New York mansion, right?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. Maxwell was present when Prince Andrew
 12 interacted with Virginia in your New York mansion,
 13 right?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. There was a puppet in the room when Maxwell
 19 and Virginia and Prince Andrew were all together in
 20 your New York mansion?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. A puppet was used to fondle the breasts of

Page 262

1 J. Epstein - Confidential
 2 girls under the age of 18, right?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Who fondled the breasts of underage girls
 8 in your New York mansion with a puppet?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. To your knowledge, Prince Andrew had sex
 14 with Virginia several times, right?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. Nadia Marcinkova was controlled by
 20 Ghislaine Maxwell, right?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. We talked about the timeframe 2000 to 2001.

Page 263

1 J. Epstein - Confidential
 2 Who controlled Nadia Marcinkova?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. In 2000 to 2001, Maxwell controlled
 8 Nadia Marcinkova, right?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. In fact, Nadia Marcinkova remains indebted
 14 to Maxwell even today, right?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. In fact, Sarah Kellen remains indebted to
 20 Maxwell even today, right?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. Describe -- describe the relationship

Page 264

1 J. Epstein - Confidential
 2 between Sarah Kellen and Ghislaine Maxwell.
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. In 2000 to 2001, Sarah Kellen was
 8 controlled by Ghislaine Maxwell, right?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Please describe all of the relationships
 14 Ghislaine Maxwell has with your companies and
 15 businesses.
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. In fact, Maxwell has been a partner with
 21 you in several of your business enterprises, right?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 265

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. You continue to have a very close working
 4 relationship with Maxwell today, right?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. You and Maxwell have been coordinating
 10 together on this litigation, right?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. You hope that Maxwell prevails in this
 16 litigation, right?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. You and Ghislaine Maxwell regularly
 22 transported girls across state lines for sexual
 23 purposes, right?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 266

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. Please describe all the situations in which
 5 you and Maxwell have been involved in the interstate
 6 transportation of girls under the age of 18.
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. You have used cell phones and land line
 12 cell phone -- land line telephones to instruct
 13 Virginia Roberts to have sex, right?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. You've given instructions by telephone to
 19 Virginia Roberts to have sex with people while she is
 20 under the age of -- while she was under the age of
 21 18, right?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

Page 267

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. You have instructed girls under the age of
 4 18 via telephone and cell phone to have sex with men,
 5 right?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. You've instructed girls under the age of 18
 11 by telephone to have sex with various of your
 12 friends, right?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Have you ever threatened a witness not to
 18 talk?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Has Ghislaine Maxwell ever threatened a
 24 witness not to talk?
 25 MR. PAGLIUCA: Object to form and

Page 268

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. In fact, you have threatened witnesses not
 6 to talk, right?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. In fact, Ghislaine Maxwell has threatened
 12 witnesses not to talk, right?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. In about 2007, you arranged to have someone
 18 hunt down and find Virginia, right?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. How did you find Virginia in 2007?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 269

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. The reason you needed to find Virginia in
 5 2007 was because the FBI had opened an investigation
 6 on you, right?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. When was the last time you spoke to
 12 Ms. Giuffre?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Who?
 16 BY MR. CASSELL:
 17 Q. Miss Virginia Roberts --
 18 A. Sorry. Sorry.
 19 Q. -- Giuffre. Yeah. Virginia, I should say.
 20 Yeah.
 21 A. Fifth.
 22 Q. When was the last time you spoke to
 23 Virginia?
 24 A. Fifth.
 25 Q. In fact, you and your attorney actually got

Page 270

1 J. Epstein - Confidential
2 together on the phone with Virginia in about 2007,
3 right?
4 MR. PAGLIUCA: Object to form and
5 foundation.
6 THE WITNESS: Fifth.
7 BY MR. CASSELL:
8 Q. Which of your attorneys was on the phone
9 with Virginia in about 2007?
10 A. Fifth.
11 Q. Was it Mr. Goldberger?
12 MR. WEINBERG: Attorney-client.
13 MR. GOLDBERGER: And attorney-client.
14 I apologize. I'm sorry.
15 BY MR. CASSELL:
16 Q. This is -- I'm talking about a telephone
17 call where there was a third party, Virginia Roberts
18 Giuffre, on the phone.
19 That was Mr. Goldberger on the phone?
20 MR. PAGLIUCA: Object to form and
21 foundation.
22 THE WITNESS: Fifth.
23 MR. GOLDBERGER: And attorney-client
24 privilege.
25

Page 271

1 J. Epstein - Confidential
2 BY MR. CASSELL:
3 Q. During the call, Mr. Epstein, you asked
4 Virginia if she was going to say anything to the FBI,
5 right?
6 MR. PAGLIUCA: Object to form and
7 foundation.
8 THE WITNESS: Fifth.
9 BY MR. CASSELL:
10 Q. The clear implication of your question what
11 to Virginia was that she should not say anything to
12 the FBI, right?
13 MR. PAGLIUCA: Object to form and
14 foundation.
15 THE WITNESS: Fifth.
16 BY MR. CASSELL:
17 Q. You told Virginia directly or indirectly
18 was the best thing for her and her family was to keep
19 quiet, right?
20 MR. PAGLIUCA: Object to form and
21 foundation.
22 THE WITNESS: Fifth.
23 BY MR. CASSELL:
24 Q. What did you tell Virginia in 2007 when you
25 were on the phone with an attorney?

Page 272

1 J. Epstein - Confidential
2 A. Fifth.
3 MR. PAGLIUCA: Object to form and
4 foundation.
5 BY MR. CASSELL:
6 Q. You suggested that those who talked to the
7 FBI would be harmed, all those who did not, would be
8 helped, right?
9 MR. PAGLIUCA: Object to form and
10 foundation.
11 THE WITNESS: Fifth.
12 BY MR. CASSELL:
13 Q. And those communications you had with
14 Virginia in 2007 influenced the settlement of
15 Virginia's civil case against you in 2009?
16 MR. PAGLIUCA: Object to form and
17 foundation.
18 THE WITNESS: Fifth.
19 BY MR. CASSELL:
20 Q. The first time you met Virginia
21 Ghislaine Maxwell came up to the room with you as
22 well, right?
23 MR. PAGLIUCA: Object to form and
24 foundation.
25 THE WITNESS: Fifth.

Page 273

1 J. Epstein - Confidential
2 BY MR. CASSELL:
3 Q. Please describe who was in the room, your
4 massage room, the first time you met
5 Virginia Roberts.
6 MR. PAGLIUCA: Object to form and
7 foundation.
8 THE WITNESS: Fifth.
9 BY MR. CASSELL:
10 Q. Ghislaine Maxwell participated in the
11 sexual abuse of Virginia the first time she came over
12 to your house, right?
13 MR. PAGLIUCA: Object to form and
14 foundation.
15 THE WITNESS: Fifth.
16 BY MR. CASSELL:
17 Q. What kind of instructions did Maxwell give
18 Virginia when you first met Virginia?
19 MR. PAGLIUCA: Object to form and
20 foundation.
21 THE WITNESS: Fifth.
22 BY MR. CASSELL:
23 Q. In fact, Maxwell instructed Virginia how to
24 sexually please you the first time she met you,
25 right?

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 MR. CASSELL: Those are my questions at
 6 this point. I understand Mr. Pagliuca may
 7 have some questions, and I'll have some
 8 follow-up based on that.
 9 MR. GOLDBERGER: Okay. So why don't we
 10 take ten or 15. You guys can eat your
 11 lunch, and we'll go into my office. And
 12 about ten, 15-minutes we'll come in.
 13 THE WITNESS: It's 12 now. 12:15 come
 14 back?
 15 MR. CASSELL: That's fine.
 16 VIDEO TECHNICIAN: Off the record at
 17 12:00 o'clock.
 18 (A lunch recess was taken.)
 19 A F T E R N O O N S E S S I O N
 20 - - -
 21 VIDEO TECHNICIAN: On the record at
 22 12:21.
 23 MR. GOLDBERGER: Jeffrey, before you
 24 ask your question, did -- did we reach the
 25 same agreement with you that we did with

1 J. Epstein - Confidential
 2 Q. In fact, the question I just asked you was
 3 a leading question, as an example, correct?
 4 A. Fifth.
 5 Q. You would agree with me that Mr. Cassell's
 6 questions about Ms. Maxwell had no basis in fact,
 7 correct?
 8 MR. CASSELL: Objection to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. PAGLIUCA:
 12 Q. You would agree with me that the purported
 13 factual basis underlying Mr. Cassell's questions did
 14 not occur, correct?
 15 MR. CASSELL: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. PAGLIUCA:
 19 Q. And you would agree with me that had you
 20 been able to answer Mr. Cassell's questions, your
 21 answers would have supported Ms. Maxwell in this
 22 litigation and not supported the Plaintiff, correct?
 23 MR. CASSELL: Object to form and
 24 foundation, and calls for a legal
 25 conclusion.

1 J. Epstein - Confidential
 2 Mr. Cassell concerning the more -- the
 3 longer Fifth Amendment invocation?
 4 MR. PAGLIUCA: Yes. In the beginning
 5 of the deposition I indicated that that was
 6 perfectly acceptable with me.
 7 MR. GOLDBERGER: Okay.
 8 MR. PAGLIUCA: And I'm also happy,
 9 Mr. Cassell, if you want to make form and
 10 foundation objections, I will understand
 11 that that encompasses the totality of the
 12 objections.
 13 MR. CASSELL: All right.
 14 C R O S S - E X A M I N A T I O N
 15 BY MR. PAGLIUCA:
 16 Q. Good afternoon, Mr. Epstein. My name is
 17 Jeff Pagliuca.
 18 We have never met before, correct?
 19 A. Correct.
 20 Q. Mr. Epstein, you were asked a number of
 21 leading questions by Mr. Cassell this morning and
 22 into this afternoon.
 23 You understand what a leading question is,
 24 correct?
 25 A. Fifth.

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. PAGLIUCA:
 4 Q. In fact, had you been able to answer, you
 5 would have denied any sexual impropriety with the
 6 Plaintiff in this case, formerly Ms. Roberts, now
 7 Ms. Giuffre, correct?
 8 MR. CASSELL: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. PAGLIUCA:
 12 Q. And you would have denied any sexual
 13 impropriety with any other individuals in answer to
 14 Mr. Cassell's questions had you been able to answer,
 15 correct?
 16 MR. CASSELL: Form and foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. PAGLIUCA:
 19 Q. Mr. Cassell asked you some questions about
 20 your financial status. I'm going to repeat a couple
 21 of those briefly.
 22 You would agree with me that you are a very
 23 wealthy man, correct, Mr. Epstein?
 24 A. Fifth.
 25 MR. CASSELL: Object to form and

Page 278

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Sorry.
 4 BY MR. PAGLIUCA:
 5 Q. You would agree with me that you do not
 6 depend on Ghislaine Maxwell for any financial
 7 support, correct?
 8 MR. CASSELL: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. PAGLIUCA:
 12 Q. You do not have any business relationship
 13 with Ghislaine Maxwell, correct?
 14 MR. CASSELL: Object to form and
 15 foundation and vague.
 16 THE WITNESS: Fifth.
 17 BY MR. PAGLIUCA:
 18 Q. You do not have any social relationship
 19 with Ghislaine Maxwell, correct?
 20 MR. CASSELL: Object to form and
 21 foundation and vague.
 22 THE WITNESS: Fifth.
 23 BY MR. PAGLIUCA:
 24 Q. All right. You have not spoken to
 25 Ghislaine Maxwell in many years, correct?

Page 279

1 J. Epstein - Confidential
 2 MR. CASSELL: Object to form and
 3 foundation, and vague as to what the term
 4 "spoken" means.
 5 THE WITNESS: Fifth.
 6 BY MR. PAGLIUCA:
 7 Q. You've not had any verbal communication,
 8 meaning oral, with Ms. Maxwell for many years,
 9 correct?
 10 MR. CASSELL: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. PAGLIUCA:
 14 Q. You have not physically seen Ms. Maxwell in
 15 many years, correct?
 16 A. Fifth.
 17 Q. You have not --
 18 MR. CASSELL: I'm sorry. I missed the
 19 -- form and foundation objection.
 20 BY MR. PAGLIUCA:
 21 Q. You have not been in any location
 22 contemporaneously with Ms. Maxwell in many years,
 23 correct?
 24 MR. CASSELL: Object to form and
 25 foundation.

Page 280

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. PAGLIUCA:
 4 Q. Any relationship you had, whether personal
 5 or business, ended with Ms. Maxwell more than
 6 15 years ago, correct?
 7 MR. CASSELL: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. PAGLIUCA:
 11 Q. Ms. Maxwell is not --
 12 MR. CASSELL: I'm sorry. Could you
 13 mark that question for me as well? The last
 14 one.
 15 BY MR. PAGLIUCA:
 16 Q. Ms. Maxwell is not an employee of yours,
 17 correct?
 18 MR. CASSELL: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. PAGLIUCA:
 22 Q. Ms. Maxwell is not an agent of yours,
 23 correct?
 24 MR. CASSELL: Object to form and
 25 foundation. Calls for a legal conclusion.

Page 281

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. PAGLIUCA:
 4 Q. Ms. -- Ms. Maxwell -- you are not an agent
 5 of Ms. Maxwell's, correct?
 6 MR. CASSELL: Object to form and
 7 foundation. Calls for a legal conclusion.
 8 THE WITNESS: Fifth.
 9 BY MR. PAGLIUCA:
 10 Q. Ms. Maxwell has never authorized you to act
 11 on her behalf, correct?
 12 MR. CASSELL: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. PAGLIUCA:
 16 Q. Ms. Maxwell does not control any of your
 17 decisions in any way --
 18 MR. CASSELL: Object to form --
 19 BY MR. PAGLIUCA:
 20 Q. -- correct?
 21 MR. CASSELL: Sorry. Object to form
 22 and foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. PAGLIUCA:
 25 Q. Do you understand that Ms. Maxwell opposes

Page 282

1 J. Epstein - Confidential
 2 you asserting any Fifth Amendment privilege in this
 3 matter?
 4 MR. CASSELL: Objects to form -- object
 5 and foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. PAGLIUCA:
 8 Q. Do you understand that Ms. Maxwell believes
 9 that your truthful testimony in this case would be
 10 helpful to her?
 11 MR. CASSELL: Object to form and
 12 foundation. Calls for speculation.
 13 THE WITNESS: Fifth.
 14 BY MR. PAGLIUCA:
 15 Q. You indicated earlier that you and I have
 16 never met.
 17 You and I have never spoken prior to today,
 18 correct?
 19 MR. CASSELL: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. PAGLIUCA:
 23 Q. You have never spoken to any member of my
 24 law firm prior to today, correct?
 25 MR. CASSELL: Object to form and

Page 283

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. PAGLIUCA:
 5 Q. In 2009, you entered into a settlement
 6 agreement with Ms. Giuffre, formerly known as
 7 Ms. Roberts, the Plaintiff in this case, correct?
 8 MR. CASSELL: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 MR. GOLDBERGER: And attorney-client
 12 privilege. And to the extent that there's
 13 an agreement that exists that's
 14 confidential, we will not waive the
 15 confidentiality agreement.
 16 MR. PAGLIUCA: And we can have -- you
 17 can have a standing objection to that on
 18 those grounds related to any question I ask
 19 about the settlement agreement with
 20 Ms. Giuffre, if that makes it easier.
 21 MR. GOLDBERGER: Yeah. That makes it
 22 easier. Thank you.
 23 BY MR. PAGLIUCA:
 24 Q. I've not seen the settlement agreement.
 25 But let me ask you if you can tell me what the terms

Page 284

1 J. Epstein - Confidential
 2 of that agreement are, Mr. Epstein.
 3 MR. CASSELL: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. PAGLIUCA:
 7 Q. Does the settlement agreement contain a
 8 release of any claims that Ms. Giuffre had or would
 9 have against you?
 10 MR. CASSELL: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. PAGLIUCA:
 14 Q. Did the settlement agreement provide for a
 15 release by you of any claims against Giuffre?
 16 MR. CASSELL: Form and foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. PAGLIUCA:
 19 Q. It's true, is it not, Mr. Epstein, you have
 20 no economic interest in this litigation?
 21 MR. CASSELL: Form and foundation.
 22 Calls for a legal conclusion.
 23 THE WITNESS: Fifth.
 24 BY MR. PAGLIUCA:
 25 Q. And by "this litigation," I mean the

Page 285

1 J. Epstein - Confidential
 2 litigation we are here on today, the Plaintiff being
 3 Ms. Giuffre, the Defendant being Ms. Maxwell.
 4 So, to be clear, you are not named as a
 5 Defendant in that litigation, correct?
 6 MR. CASSELL: Form and foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. PAGLIUCA:
 9 Q. The outcome of this litigation, the Giuffre
 10 versus Maxwell litigation, will have no impact on you
 11 financially, correct?
 12 MR. CASSELL: Form and foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. PAGLIUCA:
 15 Q. And the outcome of -- of this litigation
 16 will not affect you in any way, correct?
 17 MR. CASSELL: Form and foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. PAGLIUCA:
 20 Q. In 2007 you entered into what's been
 21 referred to here today as a non-prosecution agreement
 22 with the United States Government; is that correct?
 23 A. Fifth.
 24 Q. And as part of that non-prosecution
 25 agreement, the United States of America agreed to not

Page 286

1 J. Epstein - Confidential
 2 institute criminal charges against alleged potential
 3 co-conspirators in that matter, including
 4 Sarah Kellen, Adriana Ross, Leslie Goth (phonetic),
 5 or Nadia Marcinkova; is that correct?
 6 MR. CASSELL: Form and foundation.
 7 Calls for a legal conclusion.
 8 MR. WEINBERG: To the extent your
 9 knowledge is based on communications with
 10 attorneys, attorney-client privilege.
 11 THE WITNESS: Fifth.
 12 BY MR. PAGLIUCA:
 13 Q. You were provided, Mr. Epstein, with a copy
 14 of the non-prosecution agreement that you entered
 15 into with the United States Government in 2007,
 16 correct?
 17 A. Fifth.
 18 MR. WEINBERG: Attorney-client
 19 privilege.
 20 BY MR. PAGLIUCA:
 21 Q. And you've read a non-prosecution agreement
 22 that you entered into with the United States
 23 Government in 2007 before you signed it, correct?
 24 A. Fifth.
 25 Q. Ms. Maxwell was not identified by name in

Page 287

1 J. Epstein - Confidential
 2 the non-prosecution agreement, correct?
 3 A. Fifth.
 4 Q. And Ms. Maxwell was not identified in the
 5 non-prosecution agreement because she was not a
 6 conspirator in any crime, correct?
 7 MR. CASSELL: Form and foundation.
 8 Calls for a legal conclusion.
 9 THE WITNESS: Fifth.
 10 BY MR. PAGLIUCA:
 11 Q. You are aware, from sources other than your
 12 lawyers, that Mr. Edwards, who is one of the
 13 Plaintiff's lawyers in this case, and Mr. Cassell,
 14 who has taken your deposition here today, are
 15 attempting to have your non-prosecution agreement
 16 with the United States Government voided, correct?
 17 A. Fifth.
 18 MR. CASSELL: Object to form and
 19 foundation.
 20 MR. GOLDBERGER: And attorney-client
 21 privilege.
 22 BY MR. PAGLIUCA:
 23 Q. Absent the attempts by Mr. Cassell and
 24 Edwards on behalf of their clients to void your
 25 non-prosecution agreement, you would be available as

Page 288

1 J. Epstein - Confidential
 2 a witness to testify in this case, correct?
 3 A. Fifth.
 4 MR. CASSELL: Object to form and
 5 foundation. Calls for a legal conclusion.
 6 MR. WEINBERG: The answer would be
 7 based on the attorney-client privilege
 8 communication.
 9 MR. GOLDBERGER: I think he said, the
 10 Fifth.
 11 THE COURT REPORTER: Okay.
 12 THE WITNESS: Fifth.
 13 BY MR. PAGLIUCA:
 14 Q. And setting aside any communications that
 15 you may have had with any lawyers representing you,
 16 absent the efforts by Mr. Cassell and Edwards to have
 17 your non-prosecution agreement voided, you would be
 18 able to testify as a witness in this matter, correct?
 19 MR. CASSELL: Form and foundation.
 20 Calls for a legal conclusion.
 21 THE WITNESS: Fifth.
 22 BY MR. PAGLIUCA:
 23 Q. Absent the efforts by Mr. Cassell and
 24 Mr. Edwards to void your non-prosecution agreement,
 25 you would be willing to testify as a witness in this

Page 289

1 J. Epstein - Confidential
 2 case, correct?
 3 MR. CASSELL: Form and foundation.
 4 Speculation.
 5 THE WITNESS: Fifth.
 6 BY MR. PAGLIUCA:
 7 Q. And absent the efforts by Mr. Cassell and
 8 Mr. Edwards to void your non-prosecution agreement,
 9 your willing, truthful testimony in this case would
 10 be helpful to Ms. Maxwell, correct?
 11 MR. CASSELL: Form. Foundation. Calls
 12 for a legal conclusion. Speculation.
 13 THE WITNESS: Fifth.
 14 BY MR. PAGLIUCA:
 15 Q. You were asked some questions by
 16 Mr. Cassell about the lawsuit by Ms. Roberts against
 17 you.
 18 It's true, is it not, that the allegations
 19 contained in that complaint against you by Ms. --
 20 then Roberts or Giuffre were false, correct?
 21 MR. CASSELL: Form. Foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. PAGLIUCA:
 24 Q. And any allegations in that complaint by
 25 Ms. Giuffre/Roberts against you relating to

Page 290

1 J. Epstein - Confidential
 2 Ms. Maxwell were false, correct?
 3 MR. CASSELL: Form. Foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. PAGLIUCA:
 6 Q. Can you tell me, Mr. Epstein, given that
 7 the allegations against you in the complaint by
 8 Ms. Roberts/Giuffre were false, why did you settle
 9 the lawsuit?
 10 MR. CASSELL: Form. Foundation.
 11 MR. GOLDBERGER: And attorney-client
 12 privilege.
 13 MR. WEINBERG: Attorney-client
 14 privilege. Sorry, Jack.
 15 MR. GOLDBERGER: That's okay, Marty.
 16 THE WITNESS: Fifth.
 17 BY MR. PAGLIUCA:
 18 Q. And without regard -- so I'm not asking you
 19 for any communication between you and any lawyer.
 20 Given the fact that the allegations given
 21 by Miss Giuffre/Roberts against you were false,
 22 without discussing any information communicated to
 23 you by any lawyer, what were your personal reasons
 24 for settling the lawsuit?
 25 MR. CASSELL: Form. Foundation.

Page 291

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 MR. WEINBERG: And his -- and his state
 4 of mind is inseparable from attorney-client
 5 communications.
 6 MR. PAGLIUCA: Right. I'm not asking
 7 for any attorney-client communications, so
 8 we are clear.
 9 BY MR. PAGLIUCA:
 10 Q. I don't recall if I asked you or not, but I
 11 will ask you now: What were the terms of the
 12 settlement agreement between yourself and
 13 Ms. Giuffre/Roberts?
 14 A. Fifth.
 15 MR. GOLDBERGER: And the standing
 16 objection on confidentiality.
 17 MR. PAGLIUCA: Understood.
 18 BY MR. PAGLIUCA:
 19 Q. Mr. Epstein, you read Ms. Roberts' --
 20 Ms. Virginia Roberts/Giuffre's statements published
 21 in the media about Ghislaine Maxwell, correct?
 22 MR. CASSELL: Form. Foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. PAGLIUCA:
 25 Q. When you read those statements, you

Page 292

1 J. Epstein - Confidential
 2 understood that the statements made about Ms. Maxwell
 3 were false, correct?
 4 MR. CASSELL: Form. Foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. PAGLIUCA:
 7 Q. You understood that those statements were
 8 false because Ms. Maxwell did not recruit
 9 Virginia Roberts to have sex with you, correct?
 10 MR. CASSELL: Form. Foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. PAGLIUCA:
 13 Q. You understood that the statements were
 14 false because Ms. Maxwell did not assist anyone,
 15 including yourself, in sexually trafficking
 16 Virginia Roberts to any person, correct?
 17 MR. CASSELL: Object to form and
 18 foundation. And just so the record is
 19 clear, if I just use the words "form,
 20 foundation" --
 21 MR. PAGLIUCA: That is fine with me.
 22 MR. CASSELL: Form. Foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. PAGLIUCA:
 25 Q. You understand that Virginia Roberts was

Page 293

1 J. Epstein - Confidential
 2 not 15 when she claims to have met you, true?
 3 MR. CASSELL: Form. Foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. PAGLIUCA:
 6 Q. You understand that Virginia Roberts was
 7 not 16 at the time that she claims to have met you,
 8 correct?
 9 MR. CASSELL: Form, foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. PAGLIUCA:
 12 Q. You understand -- well, isn't it true that
 13 Ms. Roberts represented to you, at the time that she
 14 met you, that she was 18 years old?
 15 MR. CASSELL: Form. Foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. PAGLIUCA:
 18 Q. Isn't it true that Ms. Roberts represented
 19 to others in your presence that she was over the age
 20 of 18?
 21 MR. CASSELL: Form. Foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. PAGLIUCA:
 24 Q. Isn't it true that Ms. Roberts represented
 25 to Ms. Maxwell that she was over the age of 18?

Page 294

1 J. Epstein - Confidential
 2 MR. CASSELL: Form. Foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. PAGLIUCA:
 5 Q. Mr. Cassell asked you some questions about
 6 a purported hospital visit involving you and
 7 Ms. Roberts/Giuffre in New York.
 8 Do you recall that, if you know, that
 9 Ms. Roberts represented to the hospital folks that
 10 she was over the age of 18?
 11 MR. CASSELL: Form. Foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. PAGLIUCA:
 14 Q. Now, when you met Ms. Giuffre/Roberts, in
 15 addition to telling you that she was over the age of
 16 18, she represented to you that she worked as a
 17 masseuse at Mar-a-Lago, correct?
 18 MR. CASSELL: Form. Foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. PAGLIUCA:
 21 Q. And you would have met her sometime in the
 22 late fall because Mar-a-Lago is closed, at least the
 23 spa part of Mar-a-Lago is closed, during the summer,
 24 correct?
 25 MR. CASSELL: Form. Foundation.

Page 295

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. PAGLIUCA:
 4 Q. And in 2000, 2001, the spa would have been
 5 closed during the summer, correct?
 6 MR. CASSELL: Form. Foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. PAGLIUCA:
 9 Q. It was your decision to hire Ms. Giuffre as
 10 a masseuse, understanding that she was over the age
 11 of 18, correct?
 12 MR. CASSELL: Form, foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. PAGLIUCA:
 15 Q. And she was not recruited by you or anyone
 16 else to have sex with you, correct?
 17 MR. CASSELL: Form. Foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. PAGLIUCA:
 20 Q. Now, at the time that Ms. Giuffre met you
 21 and represented that she was a masseuse and over the
 22 age of 18, she was driving her own car, correct?
 23 MR. CASSELL: Form, foundation.
 24 THE WITNESS: Fifth.
 25

Page 296

1 J. Epstein - Confidential
 2 BY MR. PAGLIUCA:
 3 Q. At the time that Ms. Giuffre/Roberts met
 4 you and told you that she was over the age of 18 and
 5 a masseuse, she was living with someone that she
 6 identified as her fiance, correct?
 7 MR. CASSELL: Form. Foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. PAGLIUCA:
 10 Q. At the time that Ms. Giuffre met you --
 11 represented to you that she was a masseuse over the
 12 age of 18, driving her own car, and living with her
 13 fiance in an apartment, she had the ability to come
 14 and go from your residence as she pleased, correct?
 15 MR. CASSELL: Form. Foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. PAGLIUCA:
 18 Q. You never forced Ms. Roberts ever to stay
 19 over your house at night, correct?
 20 MR. CASSELL: Form. Foundation.
 21 Vague.
 22 THE WITNESS: Fifth.
 23 BY MR. PAGLIUCA:
 24 Q. Ms. Roberts was never forced to do anything
 25 by you, correct?

Page 297

1 J. Epstein - Confidential
 2 MR. CASSELL: Form. Foundation.
 3 Vague.
 4 THE WITNESS: Fifth.
 5 BY MR. PAGLIUCA:
 6 Q. Ms. Roberts was not a "sex slave," correct?
 7 MR. CASSELL: Form. Foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. PAGLIUCA:
 10 Q. And you never sexually trafficked
 11 Ms. Roberts to anyone, correct?
 12 MR. CASSELL: Form. Foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. PAGLIUCA:
 15 Q. At the time Ms. Roberts made statements to
 16 the media about you and Ms. Maxwell, you told
 17 Ms. Maxwell on January 25th, 2015, that "You have
 18 done nothing wrong, and I would urge you to start
 19 acting like it. Go outside, head high, not as an
 20 escaping convict. Go to parties. Deal with it."
 21 Do you remem- -- recall making that written
 22 statement to Ms. Maxwell in an e-mail produced in
 23 this case, GM01098, on January 25th, 2015?
 24 MR. CASSELL: Form. Foundation.
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential
 2 BY MR. PAGLIUCA:
 3 Q. And at the time that you made that e-mail
 4 statement to Ms. Maxwell, you made it because it was
 5 true, correct?
 6 MR. CASSELL: Form. Foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. PAGLIUCA:
 9 Q. When you said to Ms. Maxwell in your
 10 written communication on January 25th, 2015, "You
 11 have done nothing wrong," you were referring to
 12 Ms. Giuffre/Roberts' false claims that somehow
 13 Ms. Maxwell had participated in sexual misconduct
 14 with Ms. Giuffre/Roberts, correct?
 15 MR. CASSELL: Form. Foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. PAGLIUCA:
 18 Q. When you said to Ms. Maxwell, "You have
 19 done nothing wrong," you were telling her that you
 20 knew that she had not been involved in any illegal
 21 activity associated with you, correct?
 22 MR. CASSELL: Form. Foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. PAGLIUCA:
 25 Q. You urged Ms. Maxwell to start acting like

1 J. Epstein - Confidential
 2 BY MR. PAGLIUCA:
 3 Q. You responded, "Okay, with me," because, in
 4 fact, [REDACTED] was your girlfriend from at least the
 5 end of 1999 through 2002, correct?
 6 MR. CASSELL: Form. Foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. PAGLIUCA:
 9 Q. It is true that neither you nor Ms. Maxwell
 10 trained Virginia Roberts to have sex with anyone,
 11 correct?
 12 MR. CASSELL: Form. Foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. PAGLIUCA:
 15 Q. And it is true that you never pimped
 16 Virginia Roberts/Giuffre out to any other person,
 17 correct?
 18 MR. CASSELL: Form. Foundation.
 19 Vague.
 20 THE WITNESS: Fifth.
 21 BY MR. PAGLIUCA:
 22 Q. To your knowledge, Virginia Roberts/Giuffre
 23 did not have sex with Alan Dershowitz?
 24 MR. CASSELL: Form. Foundation.
 25 BY MR. PAGLIUCA:

1 J. Epstein - Confidential
 2 she had done nothing wrong, because you knew that she
 3 had, in fact, done nothing wrong, correct?
 4 MR. CASSELL: Form. Foundation. Calls
 5 for speculation.
 6 THE WITNESS: Fifth.
 7 BY MR. PAGLIUCA:
 8 Q. When you told Ms. Maxwell, "Go outside,
 9 head high, not as an escaping convict," you were
 10 encouraging her to act like she had done nothing
 11 wrong because, in fact, she had done nothing wrong,
 12 correct?
 13 MR. CASSELL: Form. Foundation.
 14 Vague.
 15 THE WITNESS: Fifth.
 16 BY MR. PAGLIUCA:
 17 Q. You were responding to an e-mail sent to
 18 you by Ms. Maxwell on January 24th, 2015, in which
 19 she indicated, "I would appreciate it if [REDACTED] would
 20 come out and say that she was your girlfriend. I
 21 think she was from end '99 to 2002."
 22 Do you recall receiving that communication
 23 from Ms. Maxwell and responding to it?
 24 MR. CASSELL: Form. Foundation.
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential
 2 Q. Correct?
 3 A. Fifth.
 4 Q. Any other world leaders, correct?
 5 MR. CASSELL: Form. Foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. PAGLIUCA:
 8 Q. Any other political figures in the
 9 United States?
 10 MR. CASSELL: Form. Foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. PAGLIUCA:
 13 Q. Any other entertainers?
 14 A. Fifth.
 15 MR. CASSELL: Form. Foundation.
 16 THE WITNESS: Sorry.
 17 BY MR. PAGLIUCA:
 18 Q. In particular, David Copperfield?
 19 MR. CASSELL: Form. Foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. PAGLIUCA:
 22 Q. You understood that Ms. Roberts/Giuffre
 23 left the United States in, roughly, 2002 to go to
 24 Thailand, correct?
 25 A. Fifth.

Page 302

1 J. Epstein - Confidential
 2 Q. And the last time that you spoke or saw her
 3 was prior to her leaving for Thailand, correct?
 4 MR. CASSELL: Form. Foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. PAGLIUCA:
 7 Q. You understood that Ms. Roberts/Giuffre
 8 went to Thailand because she had a warrant out for
 9 her arrest for theft from the Roadhouse Grill,
 10 correct?
 11 MR. CASSELL: Form. Foundation. Calls
 12 for a legal conclusion.
 13 THE WITNESS: Fifth.
 14 BY MR. PAGLIUCA:
 15 Q. You were asked some questions by
 16 Mr. Cassell regarding the -- I can't recall what he
 17 referred to it as. I think it was the Palm Beach
 18 investigation.
 19 Are you aware that in approximately March
 20 of 2005 -- I'm just going to wait for that noise to
 21 die down here, whatever that is.
 22 You're aware that in approximately March
 23 of 2005, the Palm Beach Police Department began an
 24 investigation concerning you based on a report from a
 25 woman named Erica Gonzalez?

Page 303

1 J. Epstein - Confidential
 2 MR. CASSELL: Form. Foundation.
 3 MR. GOLDBERGER: And attorney-client
 4 privilege.
 5 THE WITNESS: Fifth.
 6 BY MR. PAGLIUCA:
 7 Q. I'm not asking you for any information
 8 based on attorney-client privilege, Mr. Epstein, for
 9 any of these questions.
 10 I'm assuming that you were provided and
 11 read police reports related to the Palm Beach
 12 investigation. Based on your reading of those
 13 reports and not based on any conversations with any
 14 lawyers that you may have had at the time, you are
 15 aware that in approximately March of 2005, the Palm
 16 Beach Police Department began an investigation
 17 concerning you based on a report from a woman named
 18 Erica Gonzalez?
 19 A. Fifth.
 20 Q. You were provided with a copy of the police
 21 reports related to that investigation, correct?
 22 A. Fifth.
 23 MR. GOLDBERGER: And attorney-client
 24 privilege.
 25

Page 304

1 J. Epstein - Confidential
 2 BY MR. PAGLIUCA:
 3 Q. The police reports generally indicated that
 4 allegations that you had sexual contact with females
 5 under the age of 18 in the Palm Beach area, correct?
 6 A. Fifth.
 7 Q. Virginia Roberts/Giuffre was not one of the
 8 alleged victims discussed or contacted in connection
 9 with that investigation, correct?
 10 MR. CASSELL: Form. Foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. PAGLIUCA:
 13 Q. And to your knowledge,
 14 Virginia Roberts/Giuffre was never contacted by the
 15 Palm Beach Police Department?
 16 MR. CASSELL: Form. Foundation.
 17 Vague.
 18 THE WITNESS: Fifth.
 19 BY MR. PAGLIUCA:
 20 Q. None of the alleged victims in the Palm
 21 Beach investigation identified Ghislaine Maxwell as a
 22 part of any alleged sexual contact scheme, correct?
 23 MR. CASSELL: Form. Foundation.
 24 THE WITNESS: Fifth.
 25

Page 305

1 J. Epstein - Confidential
 2 BY MR. PAGLIUCA:
 3 Q. You're aware that no one connected with
 4 that investigation accused Ms. Maxwell of any
 5 wrongdoing?
 6 MR. CASSELL: Form. Foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. PAGLIUCA:
 9 Q. None of the alleged victims in the Palm
 10 Beach investigation claimed that they traveled with
 11 you in any airplane, correct?
 12 A. Fifth.
 13 Q. None of the alleged victims in the Palm
 14 Beach investigation claimed that they traveled with
 15 you outside of the State of Florida, correct?
 16 MR. CASSELL: Form. Foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. PAGLIUCA:
 19 Q. None of the alleged victims in the Palm
 20 Beach investigation claimed that you have been
 21 introduced to them by Ghislaine Maxwell, correct?
 22 MR. CASSELL: Form. Foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. PAGLIUCA:
 25 Q. In fact, the majority of the alleged

Page 306

1 J. Epstein - Confidential
 2 victims in the Palm Beach investigation claimed to
 3 have been recruited by someone named Haley Robson,
 4 correct?
 5 MR. CASSELL: Form. Foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. PAGLIUCA:
 8 Q. You're aware, Mr. Epstein, that these
 9 police reports are available as a public record by
 10 request to the Palm Beach Police Department?
 11 A. Fifth.
 12 Q. And you're aware, Mr. Epstein, that
 13 unredacted versions of these police reports can be
 14 obtained from the State's Attorney's Office hereby a
 15 letter request, correct?
 16 MR. CASSELL: Form -- form.
 17 Foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. PAGLIUCA:
 20 Q. Mr. Cassell asked you some questions
 21 earlier about some police reports related to
 22 Ms. Roberts/Giuffre related to her claims that she
 23 had been sexually assaulted here in Florida by men
 24 other than you. Do you recall those questions?
 25 A. Yes.

Page 307

1 J. Epstein - Confidential
 2 Q. Okay. Are you aware that those police
 3 reports are also available by simply requesting them
 4 from the Palm Beach Police Department?
 5 MR. CASSELL: Form. Foundation. Calls
 6 for a legal conclusion.
 7 THE WITNESS: Fifth.
 8 MR. CASSELL: Can we hold on one
 9 second?
 10 MR. PAGLIUCA: Sure. Having a problem
 11 there?
 12 MR. CASSELL: Take 30 seconds to see if
 13 we can get these going.
 14 All right. You're on, Jeff.
 15 MR. PAGLIUCA: Okay.
 16 BY MR. PAGLIUCA:
 17 Q. With regard to the Palm Beach Police
 18 Department investigation, you're aware that none of
 19 the alleged victims in that matter claimed to have
 20 lived with you?
 21 MR. CASSELL: Form. Foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. PAGLIUCA:
 24 Q. You're aware that none of the alleged
 25 victims in that matter claimed to have stayed with

Page 308

1 J. Epstein - Confidential
 2 you overnight in any residence?
 3 MR. CASSELL: Form. Foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. PAGLIUCA:
 6 Q. You're aware that none of those alleged
 7 victims claimed to have ever met or talked to
 8 Ms. Maxwell?
 9 MR. CASSELL: Form. Foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. PAGLIUCA:
 12 Q. And you're aware that none of those alleged
 13 victims ever claimed to have been paid by
 14 Ms. Maxwell?
 15 MR. CASSELL: Form. Foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. PAGLIUCA:
 18 Q. It is true, Mr. Epstein, that you, at least
 19 during timeframe that we are talking about here, so I
 20 will say from, let's say, 1999 through 2005, enjoyed
 21 getting a massage; is that correct?
 22 A. Fifth.
 23 Q. And you had many masseuses that you hired
 24 to come to your house to give you a massage, correct?
 25 MR. CASSELL: Object to form.

Page 309

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. PAGLIUCA:
 4 Q. Many of those masseuses were contacted as
 5 part of the Palm Beach Police Department
 6 investigation; do you recall that?
 7 A. Fifth.
 8 Q. And many of those masseuses that were
 9 contacted indicated that all of their massages were
 10 professional and paid for by you; do you recall that?
 11 MR. CASSELL: Form. Foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. PAGLIUCA:
 14 Q. Now, you -- after Ms. Roberts left the
 15 country as a result of the warrant out for her arrest
 16 for theft, you later learned that she was bringing
 17 civil claims against you, purporting that you had
 18 sexually assaulted her, correct?
 19 MR. CASSELL: Form. Foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. PAGLIUCA:
 22 Q. And those claims were raised up by her
 23 after a lot of publicity had occurred related to the
 24 Palm Beach investigation about you with the
 25 allegations of sexual misconduct, correct?

Page 310

1 J. Epstein - Confidential
 2 MR. CASSELL: Form. Foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. PAGLIUCA:
 5 Q. There were widespread media reports
 6 detailing the allegations about you in the press here
 7 in the South Florida area at the time, correct?
 8 MR. CASSELL: Form. Foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. PAGLIUCA:
 11 Q. Would you agree with me, Mr. Epstein, that
 12 the police -- the leaking of the police reports and
 13 the leaking of the information to the press, the
 14 reporting of the allegations by the press made you an
 15 easy target for anyone who wanted to make a claim of
 16 sexual misconduct against you?
 17 MR. CASSELL: Form. Foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. PAGLIUCA:
 20 Q. And, indeed, there were many people who
 21 began falsely claiming that you had engaged in some
 22 form of sexual misconduct with them?
 23 MR. CASSELL: Form. Foundation.
 24 THE WITNESS: Fifth.
 25

Page 311

1 J. Epstein - Confidential
 2 BY MR. PAGLIUCA:
 3 Q. You were also an easy target for
 4 unscrupulous lawyers to make those claims and promote
 5 those claims against you, correct?
 6 MR. CASSELL: Form. Foundation.
 7 Vague.
 8 THE WITNESS: Fifth.
 9 BY MR. PAGLIUCA:
 10 Q. For example, there was a lawyer, now
 11 disbarred and in prison, named Mr. Rothstein, who was
 12 promoting lawsuits against you as part of a Ponzi
 13 scheme here, correct?
 14 MR. CASSELL: Form. Foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. PAGLIUCA:
 17 Q. And Mr. Rothstein was trying to convince
 18 people to buy shares in litigation against you and
 19 the outcome of litigation against you, correct?
 20 MR. CASSELL: Form. Foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. PAGLIUCA:
 23 Q. Mr. Rothstein worked with an individual
 24 named Bradley Edwards prior to Mr. Rothstein being
 25 prosecuted and imprisoned, correct?

Page 312

1 J. Epstein - Confidential
 2 MR. CASSELL: Form. Foundation. Lack
 3 of personal knowledge.
 4 THE WITNESS: Fifth.
 5 BY MR. PAGLIUCA:
 6 Q. And you knew personally that Mr. Rothstein
 7 worked with Mr. Edwards because you sued both
 8 Mr. Rothstein and Mr. Edwards in case captioned
 9 Jeffrey Epstein, Plaintiff, versus Scott Rothstein,
 10 individually, Bradley J. Edwards, individually, and
 11 L.M., individually in 2009, correct?
 12 MR. CASSELL: Form. Foundation. Lack
 13 of personal knowledge.
 14 THE WITNESS: Fifth.
 15 BY MR. PAGLIUCA:
 16 Q. That would be in 2008. So let me amend
 17 that. The question would be in 2008.
 18 MR. CASSELL: Form. Foundation. Lack
 19 of personal knowledge.
 20 BY MR. PAGLIUCA:
 21 Q. Your lawyer at the time was somebody named
 22 Robert D. Critton, correct?
 23 MR. CASSELL: Form. foundation. Lack
 24 of proper pronunciation. It's Critton, I
 25 think.

Page 313

1 J. Epstein - Confidential
 2 BY MR. PAGLIUCA:
 3 Q. Critton. Okay. C-R-I-T-T-O-N.
 4 A. Fifth.
 5 Q. You say, Critton. I say, Critton. I don't
 6 know how to --
 7 MR. CASSELL: Jack might know.
 8 MR. GOLDBERGER: I hate to weigh in on
 9 it, but Mr. Cassell's -- Professor Cassell
 10 is correct.
 11 BY MR. PAGLIUCA:
 12 Q. In that lawsuit you claimed that
 13 Mr. Rothstein and Mr. Edwards manufactured claims
 14 against you, correct?
 15 MR. CASSELL: Form. Foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. PAGLIUCA:
 18 Q. In that lawsuit, you alleged that
 19 Mr. Rothstein and Mr. Edwards were guilty of criminal
 20 conduct, including running a Ponzi scheme, securities
 21 fraud, perjury, and other crimes, correct?
 22 MR. CASSELL: Form. Foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. PAGLIUCA:
 25 Q. You indicated -- well, isn't it true that

Page 314

1 J. Epstein - Confidential
 2 Mr. Rothstein and Mr. Edwards were able to have women
 3 change their stories about you and make false
 4 allegations against you for money?
 5 MR. CASSELL: Form. Foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. PAGLIUCA:
 8 Q. In this case, you are aware that
 9 Mr. Edwards represents Ms. Giuffre/Roberts?
 10 A. Fifth.
 11 Q. And you are aware that Mr. Edwards and a
 12 lawyer named Jack Scarola contacted Ms. Giuffre prior
 13 to the filing of any -- of this lawsuit to discuss
 14 with her allegations against you and Ms. Maxwell,
 15 correct?
 16 A. Fifth.
 17 Q. Is it -- it is true that Mr. Edwards
 18 provided Ms. Giuffre/Roberts with substantial
 19 information from both the Palm Beach investigation
 20 about you and other information that they had
 21 obtained so that they could promote their allegations
 22 against you in this litigation, correct?
 23 MR. CASSELL: Form. Foundation. Calls
 24 for speculation. Lack of personal
 25 knowledge.

Page 315

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. PAGLIUCA:
 4 Q. It is true, Mr. Epstein, that you did not
 5 sexually traffic Ms. Roberts/Giuffre, correct?
 6 MR. CASSELL: Form. Foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. PAGLIUCA:
 9 Q. And it's true, Mr. Epstein, that
 10 Ms. Maxwell did nothing to assist you in sexually
 11 trafficking Ms. Giuffre/Roberts, correct?
 12 MR. CASSELL: Form. Foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. PAGLIUCA:
 15 Q. The reason you are asserting a Fifth
 16 Amendment privilege here today has nothing do with
 17 Ghislaine Maxwell, correct?
 18 MR. CASSELL: Form. Foundation. Calls
 19 for speculation.
 20 THE WITNESS: Fifth.
 21 MR. GOLDBERGER: And attorney-client
 22 privilege.
 23 BY MR. PAGLIUCA:
 24 Q. The reason you are asserting the Fifth
 25 Amendment privilege here today is to protect yourself

Page 316

1 J. Epstein - Confidential
 2 from possible prosecution from others, correct?
 3 MR. CASSELL: Form. Foundation.
 4 THE WITNESS: Fifth.
 5 MR. GOLDBERGER: And attorney-client.
 6 MR. WEINBERG: Attorney-client
 7 privilege.
 8 MR. GOLDBERGER: Yeah. We got it.
 9 Thanks.
 10 MR. WEINBERG: Sorry, Jack.
 11 MR. GOLDBERGER: That's all right.
 12 BY MR. PAGLIUCA:
 13 Q. It is true, Mr. Epstein, you have no
 14 loyalty to Ms. Maxwell, as you sit here today,
 15 correct?
 16 MR. CASSELL: Form. Foundation.
 17 THE WITNESS: Fifth.
 18 MR. PAGLIUCA: I think I am done. So
 19 if you'll give me a minute, I'll go over my
 20 notes. We can take a five-minute break.
 21 VIDEO TECHNICIAN: Off the record at
 22 1:03.
 23 (A recess was taken.)
 24 VIDEO TECHNICIAN: On the record at
 25 1:18.

Page 317

1 J. Epstein - Confidential
 2 BY MR. PAGLIUCA:
 3 Q. I just have a few more questions,
 4 Mr. Epstein.
 5 This [REDACTED] person that you've identified
 6 as being your girlfriend, this was, roughly, from the
 7 end of 1999 that [REDACTED] was your girlfriend, correct?
 8 A. Fifth.
 9 Q. What's [REDACTED] last name?
 10 A. Fifth.
 11 Q. And is it true that you had not --
 12 MR. CASSELL: I'm sorry. Can we go --
 13 the question before the "last name," I
 14 should have objected to form and foundation
 15 on that one.
 16 MR. PAGLIUCA: What was [REDACTED] last
 17 name?
 18 MR. CASSELL: The one that [REDACTED] was,
 19 in fact, your girlfriend. I'm sorry. I
 20 apologize. I should have -- form and
 21 foundation on that one.
 22 MR. PAGLIUCA: I'll give it to you.
 23 MR. CASSELL: Thanks.
 24 MR. PAGLIUCA: In face, here, I'll ask
 25 it again so you can object.

1 J. Epstein - Confidential
 2 MR. CASSELL: Thank you.
 3 BY MR. PAGLIUCA:
 4 Q. It is true that [REDACTED] was your girlfriend
 5 from approximately the end of 1999, correct?
 6 MR. CASSELL: Form and foundation.
 7 Thank you.
 8 THE WITNESS: Fifth.
 9 BY MR. PAGLIUCA:
 10 Q. Ms. Maxwell had not been your girlfriend
 11 for some time prior to 1999, correct?
 12 MR. CASSELL: Form. Foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. PAGLIUCA:
 15 Q. In fact, beginning prior to 1999, you spent
 16 less and less time with Ms. Maxwell, correct?
 17 MR. CASSELL: Form. Foundation. And
 18 -- and chronology.
 19 Are you saying -- are you going
 20 backwards in time?
 21 MR. PAGLIUCA: Yes, I am.
 22 MR. CASSELL: Okay. Vague.
 23 THE WITNESS: Fifth.
 24 BY MR. PAGLIUCA:
 25 Q. After 1999, when [REDACTED] was your

1 J. Epstein - Confidential
 2 correct?
 3 MR. CASSELL: Form. Foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. PAGLIUCA:
 6 Q. And after 1999, moving forward, Ms. Maxwell
 7 spent less and less time, so increasingly less time
 8 visiting your house in Palm Beach, correct?
 9 MR. CASSELL: Form. Foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. PAGLIUCA:
 12 Q. You were the person responsible for hiring
 13 or firing any of your domestic employees from 1998
 14 moving forward in time, correct?
 15 MR. CASSELL: Form. Foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. PAGLIUCA:
 18 Q. From 1998 moving forward in time, you made
 19 all of the decisions with regard to the hiring and
 20 firing of any employee, correct?
 21 MR. CASSELL: Form. Foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. PAGLIUCA:
 24 Q. From 1998 moving forward, you made all the
 25 decisions with regard to the job functions of any of

1 J. Epstein - Confidential
 2 girlfriend, Ms. Maxwell spent less and less time in
 3 your presence, correct?
 4 MR. CASSELL: Form. Foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. PAGLIUCA:
 7 Q. After 1999, when [REDACTED] was your
 8 girlfriend, Ms. Maxwell spent less time at any of
 9 your residences, correct?
 10 MR. CASSELL: Form. Foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. PAGLIUCA:
 13 Q. After 1999, Ms. Maxwell increasingly
 14 decreased her visits to the -- your Palm Beach
 15 residence, correct?
 16 MR. CASSELL: Form. Foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. PAGLIUCA:
 19 Q. After 1999, Ms. Maxwell decreased the
 20 frequency of her travels with you, correct?
 21 MR. CASSELL: Form. Foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. PAGLIUCA:
 24 Q. And over time, from 1999 moving forward,
 25 Miss Maxwell spent less and less time with you,

1 J. Epstein - Confidential
 2 your domestic employees, correct?
 3 MR. CASSELL: Form. Foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. PAGLIUCA:
 6 Q. Is it true that you had a falling out with
 7 Virginia Roberts/Giuffre because she was increasingly
 8 using drugs and abusing drugs from 19 -- 2000 through
 9 2002?
 10 MR. CASSELL: Form. Foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. PAGLIUCA:
 13 Q. And you had a falling out with Ms. Giuffre
 14 as a result of what you observed to be erratic
 15 behavior, including criminal activity?
 16 MR. CASSELL: Form. Foundation. Lack
 17 of personal knowledge.
 18 THE WITNESS: Fifth.
 19 BY MR. PAGLIUCA:
 20 Q. Do you ever recall meeting anyone named
 21 Renaldo Rizzo?
 22 MR. CASSELL: Form. Foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. PAGLIUCA:
 25 Q. Ms. Rizzo -- Mr. Rizzo has claimed that he

Page 322

1 J. Epstein - Confidential
 2 was at a birthday party at your Palm Beach residence
 3 outside by your pool in which the only other
 4 attendees were children.
 5 Is that a true statement or not?
 6 MR. CASSELL: Foundation. Misstates
 7 the record.
 8 THE WITNESS: Fifth.
 9 BY MR. PAGLIUCA:
 10 Q. It is, in fact, not true that you had any
 11 birthday party with minor children in attendance at
 12 your pool in Palm Beach, correct?
 13 MR. CASSELL: Foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. PAGLIUCA:
 16 Q. Mr. Rizzo has also made some claims that
 17 you had a number of younger-aged females in a
 18 limousine and you went to the Dubin residence in --
 19 outside of New York City. Is Mr. Rizzo's statement
 20 about that false?
 21 A. Fifth.
 22 Q. And it is true that Mr. Rizzo has made up
 23 that story about you and the Dubins in an attempt to
 24 get money, correct?
 25 MR. CASSELL: Form. Foundation.

Page 323

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. PAGLIUCA:
 4 Q. Mr. Cassell asked you some questions about
 5 some -- someone from Sweden who Mr. Rizzo claimed
 6 that you somehow lured into the United States for
 7 purposes of sexual trafficking.
 8 That story by Mr. Rizzo is also false,
 9 correct?
 10 MR. CASSELL: Form. Foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. PAGLIUCA:
 13 Q. Do you believe that Eva Dubin, a medical
 14 doctor, would participate in some scheme to sexually
 15 traffic anyone?
 16 MR. CASSELL: Form. Foundation. Calls
 17 for speculation. Lack of personal
 18 knowledge.
 19 THE WITNESS: Fifth.
 20 MR. PAGLIUCA: That's all the questions
 21 I have.
 22 MR. CASSELL: I may want to consult
 23 with Ms. McCawley at some point, but maybe
 24 it will make sense for me to try and kind of
 25 see --

Page 324

1 J. Epstein - Confidential
 2 MS. MCCAWLEY: That's fine.
 3 MR. CASSELL: -- and she'll backstop me
 4 in case I miss a trick along the way, so...
 5 REDIRECT EXAMINATION
 6 BY MR. CASSELL:
 7 Q. We have the advantage by a very skilled
 8 court reporter who's given us a -- essentially a
 9 real-time transcript here.
 10 But I noticed that on this real-time
 11 transcript, at page 245, line 12, the question was
 12 asked to you by Mr. Pagliuca, "Any relationship you
 13 had, whether personal or business, ended with
 14 Ms. Maxwell more than 15 years ago, correct?"
 15 Do you recall being asked that question?
 16 A. Fifth.
 17 MR. GOLDBERGER: Well, I think you can
 18 answer that -- you recall being asked this
 19 question just --
 20 MR. CASSELL: That's all I'm asking.
 21 I'm not trying to trip him up here.
 22 BY MR. CASSELL:
 23 Q. Let me just restate that again.
 24 Do you recall being asked the following
 25 question: "Any relationship you had, whether

Page 325

1 J. Epstein - Confidential
 2 personal or business, ended with Ms. Maxwell more
 3 than 15 years ago, correct?"
 4 A. What's the question? I'm sorry. Do I
 5 remember the question?
 6 Q. Any relationship you had --
 7 A. No. Are you asking me do I remember --
 8 Q. Do you remember being asked that particular
 9 question?
 10 A. Sitting here at the moment, I don't.
 11 Q. Okay. I want to represent to you that you
 12 were asked the question: "Any relationship you had,
 13 whether personal or business, ended with Ms. Maxwell
 14 more than 15 years ago, correct?"
 15 A. I took the Fifth to that question, if
 16 you're re-asking the question.
 17 MR. GOLDBERGER: No. I think he's just
 18 representing that that question was asked.
 19 Don't -- and we can establish for purposes
 20 of the record that question was asked.
 21 THE WITNESS: Okay.
 22 MR. GOLDBERGER: Okay.
 23 BY MR. CASSELL:
 24 Q. In fact, you had a number of continuing
 25 personal interactions with Ms. Maxwell within the

1 J. Epstein - Confidential
2 last 15 years?
3 MR. PAGLIUCA: Object to form and
4 foundation.
5 THE WITNESS: Fifth.
6 BY MR. CASSELL:
7 Q. I want to talk to you about some of the
8 personal and other relationships you had with
9 Ms. Maxwell.
10 For example, sir, isn't it true that on
11 December 11th, 2000, you, Ms. Maxwell, Ms. Taylor,
12 and Virginia Roberts flew from the West Palm Beach
13 Airport to the Teterboro, New Jersey Airport?
14 MR. PAGLIUCA: Object to form and
15 foundation.
16 THE WITNESS: Fifth.
17 BY MR. CASSELL:
18 Q. And isn't it true that on December 14th,
19 2000, you, and Ms. Maxwell and Miss Roberts flew from
20 the Teterboro to the U.S. Virgin Islands on your
21 private jet?
22 MR. PAGLIUCA: Object to form and
23 foundation.
24 THE WITNESS: Fifth.
25

1 J. Epstein - Confidential
2 I'm sorry, Mr. Pagliuca whether there was any basis
3 in fact for some of the questions I was asking you.
4 Would it be fair to say that one of the
5 bases in fact for asking you questions about
6 Virginia's interactions with Prince Andrew would be a
7 photograph depicting Ms. Roberts and Prince Andrew?
8 MR. PAGLIUCA: Object to form and
9 foundation.
10 THE WITNESS: Fifth.
11 BY MR. CASSELL:
12 Q. You were asked some questions about a
13 lawsuit that was styled Edwards versus -- I'm sorry,
14 Epstein versus Rothstein, et al. When I ask you a
15 question about the piece of that case, that would be
16 described as your claim against Brad Edwards.
17 Do you understand the setup for the
18 question?
19 A. Yes.
20 Q. You voluntarily dismissed your legal claims
21 against Brad Edwards, right?
22 MR. PAGLIUCA: Object to form and
23 foundation.
24 THE WITNESS: Fifth.
25 MR. GOLDBERGER: And attorney-client

1 J. Epstein - Confidential
2 BY MR. CASSELL:
3 Q. Isn't it true, sir, that on January 26th,
4 2001, you, Ms. Maxwell, Ms. Taylor, and Ms. Roberts
5 flew from Teterboro to West Palm Beach?
6 MR. PAGLIUCA: Object to form and
7 foundation.
8 THE WITNESS: Fifth.
9 BY MR. CASSELL:
10 Q. Isn't it true that on March 9th, 2001, you,
11 Ms. Maxwell, Ms. Taylor, and Virginia flew from
12 Tangier, Morocco, to London, England on your private
13 jet?
14 MR. PAGLIUCA: Object to form and
15 foundation.
16 THE WITNESS: Fifth.
17 BY MR. CASSELL:
18 Q. And that was the trip where you,
19 Ms. Maxwell, and Ms. Roberts met Prince Andrew, the
20 Duke of York, right?
21 MR. PAGLIUCA: Object to form and
22 foundation.
23 THE WITNESS: Fifth.
24 BY MR. CASSELL:
25 Q. Previously you were asked by Ms. Pag--

1 J. Epstein - Confidential
2 privilege.
3 BY MR. CASSELL:
4 Q. To your knowledge, there is no lawsuit
5 pending today by you against Mr. Edwards, right?
6 MR. PAGLIUCA: Object to form and
7 foundation.
8 THE WITNESS: Fifth.
9 MR. GOLDBERGER: And attorney-client.
10 BY MR. CASSELL:
11 Q. When you traveled to England with Virginia
12 and Ms. Maxwell, Ms. Maxwell held Virginia's
13 passport, right?
14 MR. PAGLIUCA: Object to form and
15 foundation. It has been asked and answered
16 as well. I didn't go into this, and so I'm
17 not sure why we're going over it again.
18 THE WITNESS: Fifth.
19 BY MR. CASSELL:
20 Q. You had a relationship with Ms. Maxwell
21 when you traveled to -- with her to England, right?
22 MR. PAGLIUCA: Object to form and
23 foundation.
24 THE WITNESS: Fifth.
25

Page 330

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Mr. Pagliuca was suggesting there was no
 4 basis in fact for some of the questions that I asked.
 5 One of the bases in fact would have been
 6 Ms. Maxwell's possession of a passport reflecting
 7 Virginia's age to be 17 at the time she flew into
 8 England with you?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Can you ask the question?
 12 BY MR. CASSELL:
 13 Q. Isn't that true?
 14 MR. PAGLIUCA: Same objection.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. You were asked questions about an e-mail in
 18 which you used the phrase "Hold your head high."
 19 Do you recall just being asked -- just
 20 being asked those questions?
 21 A. Yes.
 22 Q. I want to talk about the phrase -- now, I
 23 want to go into the substantive issues.
 24 With regard to the phrase "Hold your head
 25 high," the reason you used that phrase is, you didn't

Page 331

1 J. Epstein - Confidential
 2 think there was anything wrong with having sex with
 3 underage girls, do you?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. In fact, you have used words along the
 9 lines of having sex with a minor girl is like
 10 stealing a bagel, true?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. And that, in fact, is your view today about
 16 the status of having an adult man, decades older than
 17 an underage girl, having sex with that underage girl,
 18 right?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. What is your view of men who are decades
 24 older having sex with 16-year-old girls?
 25 MR. PAGLIUCA: Object to form and

Page 332

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. What is your view of men who are decades
 6 older having sex with 17-year-old girls?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. You believe that a man can hold his head
 12 high after having sex with a 16-year-old girl even if
 13 he's decades older than that girl, true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation and foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. You were asked various questions by
 19 Mr. Pagliuca --
 20 MR. CASSELL: Am I pronouncing that --
 21 MR. PAGLIUCA: No.
 22 MR. CASSELL: I'm sorry.
 23 MR. PAGLIUCA: The "G" is silent.
 24 Think lasagna.
 25 MR. CASSELL: Okay.

Page 333

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Pal. He's your pal.
 3 BY MR. CASSELL:
 4 Q. You were asked some questions by
 5 Mr. Pagliuca -- got it, okay -- by Mr. Pagliuca about
 6 whether this litigation would affect you.
 7 You just recall being asked those
 8 questions?
 9 A. Yes.
 10 Q. With regard to those questions, it's true,
 11 sir, that this litigation will affect your
 12 reputation, right?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Please describe all the ways in which you
 18 foresee this litigation affecting your reputation.
 19 MR. PAGLIUCA: Object to the form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. This litigation will affect the reputation
 24 of associates of yours, won't it?
 25 MR. PAGLIUCA: Object to form and

Page 334

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. This litigation has the potential to
 6 affect the reputation of Bill Clinton, right?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. This litigation has the potential to affect
 12 the reputation of Prince Andrew, right?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. This litigation has the potential to affect
 18 the reputation of Alan Dershowitz, right?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22
 23 BY MR. CASSELL:
 24 Q. You could have been a Defendant in this
 25 action, right?

Page 335

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. In fact, as a pragmatic matter, you are
 7 essentially a Defendant in this action, right?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. You realize that many of the allegations in
 13 this litigation involve your interactions with
 14 Maxwell, working together against Virginia?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 BY MR. CASSELL:
 19 Q. You understand that if you turned over all
 20 the e-mails that we requested of you, that would
 21 provide a basis for you -- us -- let me rephrase
 22 that.
 23 You understand that if you turned over all
 24 the documents we've requested in the subpoena, that
 25 that would provide basis for a defamation action by

Page 336

1 J. Epstein - Confidential
 2 Ms. Giuffre against you, right?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. You understand that if you turned over all
 8 the documents that we have requested in this case,
 9 that would provide a basis for joining you into this
 10 case as a co-Defendant of Ms. Maxwell, right?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. What do all the documents that we have
 16 requested of you show with regard to your involvement
 17 in Ms. Maxwell's statements against Virginia?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. All the documents that we've requested from
 23 you would show that you have coordinated closely with
 24 Ms. Maxwell to attack and defame Virginia, right?
 25 MR. PAGLIUCA: Object to form and

Page 337

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. Ms. Maxwell continues to provide emotional
 6 support for you, right?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. Because of the sexual abuse you've
 12 committed against girls, you lack very many friends
 13 at this point in time, true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Name anyone who's -- well, strike that.
 19 Maxwell has been in a business relationship
 20 with you recently, right?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. You and Maxwell need to continue to be in

Page 338

1 J. Epstein - Confidential
 2 touch with each other because of interactions that
 3 you've had of a business nature, right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Please describe the ways in which you and
 9 Maxwell's affairs are intertwined currently.
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Please describe the way yours and Maxwell's
 15 business affairs are intertwined currently.
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. You were asked -- and this is kind of a
 21 setup question again.
 22 You were asked some questions about a
 23 lawsuit filed by Jane Doe 1 and Jane Doe 2 against
 24 the United States seeking to enforce rights under the
 25 Crime Victim Rights Act. Do you recall those general

Page 339

1 J. Epstein - Confidential
 2 questions?
 3 A. Yes.
 4 Q. I want you to assume for a moment that that
 5 lawsuit is dismissed tomorrow.
 6 If the lawsuit were to be dismissed
 7 tomorrow and I were to ask you all of the same
 8 questions the day after tomorrow, you would give the
 9 same answers, wouldn't you?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 MR. GOLDBERGER: Why don't you do that
 13 and we'll find out.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. That case isn't going to be thrown out,
 17 though, because it's meritorious, right?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 MR. GOLDBERGER: And attorney-client
 22 privilege.
 23 BY MR. CASSELL:
 24 Q. In fact, you conspired with the U.S.
 25 Attorney's Office to conceal the existence of your

Page 340

1 J. Epstein - Confidential
 2 non-prosecution agreement until it was concluded,
 3 right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. The non-prosecution agreement binds the
 9 U.S. Attorney's Office for the Southern District of
 10 Florida, correct?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 BY MR. CASSELL:
 14 Q. I'm sorry. Let me rephrase that.
 15 The non-prosecution agreement binds only
 16 the U.S. Attorney's Office for the Southern District
 17 of Florida, correct?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 MR. GOLDBERGER: And attorney-client
 22 privilege.
 23 BY MR. CASSELL:
 24 Q. Your non-prosecution agreement does not
 25 cover sex offenses in -- you have committed in the

Page 341

1 J. Epstein - Confidential
 2 State of New York, does it?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 MR. GOLDBERGER: Attorney-client.
 7 BY MR. CASSELL:
 8 Q. The non-prosecution agreement does not
 9 cover sex crimes committed in, for example, the U.S.
 10 Virgin Islands or New Mexico, does it?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 MR. GOLDBERGER: Attorney-client.
 15 BY MR. CASSELL:
 16 Q. You would still be unavailable to testify
 17 in the sense that you would have invoked your Fifth
 18 Amendment even without that lawsuit, right?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 MR. GOLDBERGER: Attorney-client.
 23 BY MR. CASSELL:
 24 Q. Which prosecution -- I'm sorry.
 25 Which jurisdictions are you fearful might

Page 342

1 J. Epstein - Confidential
 2 prosecute you for sex offenses?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 MR. GOLDBERGER: Attorney-client.
 7 BY MR. CASSELL:
 8 Q. You are fearful of organizations -- I'm
 9 sorry.
 10 You are fearful of prosecuting entities
 11 outside the Southern District of Florida prosecuting
 12 you for sex offenses, correct?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 MR. GOLDBERGER: Attorney-client.
 17 BY MR. CASSELL:
 18 Q. You are fearful of law enforcement
 19 organizations outside the United States prosecuting
 20 you for foreign sex offenses, correct?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 MR. GOLDBERGER: Attorney-client.
 25

Page 343

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Part of the basis for you asserting your
 4 Fifth Amendment privilege today was that you are
 5 fearful of incriminating yourself in foreign criminal
 6 prosecutions, correct?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 MR. GOLDBERGER: Attorney-client.
 11 BY MR. CASSELL:
 12 Q. In fact, you lack any basis for asserting
 13 the Fifth Amendment privilege with respect to foreign
 14 criminal prosecutions, right?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 MR. GOLDBERGER: Attorney-client.
 19 BY MR. CASSELL:
 20 Q. Please tell me everything you know about
 21 your girlfriend [REDACTED].
 22 A. Fifth.
 23 Q. In fact, during the period 1999 to 2002,
 24 Maxwell was your girlfriend, not [REDACTED]?
 25 MR. PAGLIUCA: Object to form and

Page 344

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. Between 1999 and 2002, you had threesomes,
 6 right?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. And when you had threesomes, one of the
 12 participants in the threesome was your girlfriend,
 13 true?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. The threesomes you had almost invariably
 19 involved Ghislaine Maxwell, right?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. And when I say they almost invariably
 25 involved Ghislaine Maxwell, sometimes you were in

Page 345

1 J. Epstein - Confidential
 2 threesomes with other young girls that were not your
 3 girlfriend or not --
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. When I look at the flights that
 9 Virginia Roberts was on between March 8th, 2001, and
 10 March -- no, let's see. What do I have? No. I'm
 11 sorry. Strike that.
 12 If I look at the flights that
 13 Virginia Roberts is on, according to Dave Roger's
 14 flight logs, between December 11th, 2000, and
 15 August 21st, 2002, on initial review, I do not see a
 16 single entry reflecting a [REDACTED] on those flights.
 17 Is that a correct understanding of those --
 18 the passengers on those flights?
 19 MR. PAGLIUCA: Object to form and
 20 foundation. Speculation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Is there some reason [REDACTED] is not found
 24 frequently or even at all in the flight logs during
 25 this period of time?

Page 346

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Isn't it true that the reason [REDACTED] is not
 7 found on these flight logs is, she was not your
 8 girlfriend during that period of time?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. And isn't the reason that Ghislaine Maxwell
 14 is found, I believe, invariably or certainly almost
 15 invariably on these flights -- I guess I should say
 16 almost invariably on these flights, is that she was
 17 your girlfriend at the time?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. In early 2000, you were having threesomes
 23 with Ms. Maxwell, right?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 347

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. I believe we already marked as an
 5 exhibit --
 6 MS. MCCAWLEY: July.
 7 MR. CASSELL: Oh, this is the July. Maybe
 8 we should mark this as an exhibit. Let me mark
 9 this as a new exhibit. I think this is JE14 --
 10 MS. MCCAWLEY: I think this is going to
 11 be 11.
 12 MR. CASSELL: Okay. Strike that. This
 13 will become JE11, which I represent is a
 14 transcript of Ms. Maxwell taken on
 15 July 22nd, 2016. You can take a look. I'm
 16 sorry I don't have an extra one.
 17 (Plaintiff's Exhibit JE11, Transcript of
 18 Ms. Maxwell, taken on July 22, 2016 was marked for
 19 identification.)
 20 BY MR. CASSELL:
 21 Q. I'm looking at page 55. If we look at
 22 page 55 -- I'm sorry. If we start at page 54, we
 23 see, "Did you engage in sexual activities with anyone
 24 other than Mr. Epstein at Mr. Epstein's home in Palm
 25 Beach?"

Page 348

1 J. Epstein - Confidential
 2 Do you see that question? I'm just asking
 3 you whether you see that question.
 4 A. Yes, sir.
 5 Q. After the inevitable form and foundation
 6 question, Mr. Pagliuca, we see an answer, "I did."
 7 Do you see that there?
 8 A. Yes.
 9 Q. And if we continue on down, we see, "Was
 10 there more than one person with whom you engaged in
 11 sexual activities other than Mr. Epstein at
 12 Mr. Epstein's home?" The answer is, "Yes."
 13 Do you see that there as well?
 14 A. Yes.
 15 Q. And you see the questions here: "I don't
 16 actually have a name." That's testimony by
 17 Ms. Maxwell, right?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Yes.
 21 BY MR. CASSELL:
 22 Q. This is -- so Ms. Maxwell indicates that
 23 she knew the name of the person at that time.
 24 You see that on lines 8 and 9 on page 55?
 25 MR. PAGLIUCA: Object to form and

Page 349

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: I'm sorry. Can you
 4 repeat the question?
 5 BY MR. CASSELL:
 6 Q. Yeah. Lines 8 and 9 there's a question:
 7 "Did you know the name at that time?" And then line
 8 9, "At that time I did."
 9 A. I see.
 10 Q. Do you see that -- that question there?
 11 A. Yes.
 12 Q. This is a long way of saying that
 13 Ms. Maxwell is indicating that sometime in the late
 14 '90s and early 2000s she was having threesomes with
 15 you, herself, and another person?
 16 A. Is that what it says? I'm sorry.
 17 MS. MCCAWLEY: Line 9.
 18 BY MR. CASSELL:
 19 Q. Line 9 through 10.
 20 Maybe I should ask it, if Ms. Maxwell
 21 testified that she had threesomes, who would the
 22 threesomes have been with?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. She had threesomes with you and another
 4 women, correct?
 5 MR. PAGLIUCA: Object to form and
 6 foundation.
 7 THE WITNESS: Fifth.
 8 BY MR. CASSELL:
 9 Q. And the other woman was not [REDACTED], was
 10 she?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. Who was the other woman in the threesomes
 16 that you had in this period of time with Ms. Maxwell?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. The only reason Ms. Maxwell consented to
 22 have threesomes with you was that she was your
 23 girlfriend at the time, right?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

1 J. Epstein - Confidential
 2 Q. Haley Robson reported to Ghislaine Maxwell,
 3 right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Ghislaine Maxwell controlled Haley Robson,
 9 right?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. Ghislaine Maxwell used Haley Robson to help
 15 bring girls to you for sex, right?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. What was Haley Robson's role in your
 21 household affairs?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. She was, in fact, your girlfriend from the
 5 late -- I'm sorry, from around 1996 to around 2005,
 6 right?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: Fifth.
 10 BY MR. CASSELL:
 11 Q. In fact, she actually continued to be your
 12 girlfriend into -- into 2006, 2007?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. When did you stop considering Ms. Maxwell
 18 to be your girlfriend?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Mr. Pagliuca asked you some questions about
 24 Haley Robson. Do you recall those questions?
 25 A. Yes.

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Mr. Pagliuca asked you some questions about
 4 whether you are an easy target for lawsuits. Do you
 5 recall those questions?
 6 A. Yes.
 7 Q. One of the reasons you were an easy target
 8 for lawsuits, sir, was that you sexually abused
 9 dozens and dozens of underage girls, right?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. One of the reasons you were an easy target
 15 for Virginia Roberts for sexual assault is because
 16 you had, in fact, committed sexual assault against
 17 Virginia Roberts?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. You settled dozens of lawsuits filed
 23 against you by underage girls in 2008 and 2009,
 24 didn't you?
 25 MR. PAGLIUCA: Object to form and

Page 354

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. The reason you settled those lawsuits is
 6 that you had sexually abused the girls who filed
 7 lawsuits you against you, right?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. Every one of the girls who filed a lawsuit
 13 against you had been sexually abused by you, right?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. Is there a single girl who has filed a
 19 lawsuit against you that lacked merit?
 20 MR. PAGLIUCA: Object to form and
 21 foundation.
 22 THE WITNESS: Fifth.
 23 BY MR. CASSELL:
 24 Q. When Virginia Roberts, then known as
 25 Jane Doe 102, filed a lawsuit against you, everything

Page 355

1 J. Epstein - Confidential
 2 in her lawsuit -- I'm sorry, everything in her
 3 complaint against you was true, right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. If I were to give you an unconditional
 9 waiver of the confidentiality form for the lawsuit
 10 that Virginia filed against you -- for the settlement
 11 that Virginia had of the lawsuit she filed against
 12 you, you would refuse to sign that today, right?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 MR. GOLDBERGER: And attorney-client
 17 privilege.
 18 BY MR. CASSELL:
 19 Q. Would you sign an unconditional waiver of
 20 confidentiality with regard to the settlement of that
 21 lawsuit?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25 MR. GOLDBERGER: Attorney-client

Page 356

1 J. Epstein - Confidential
 2 privilege.
 3 BY MR. CASSELL:
 4 Q. As you sit here today, you continue to
 5 maintain loyalty to Ghislaine Maxwell, today, right?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. You were asserting the Fifth Amendment
 11 privilege today not only to protect yourself but also
 12 to protect Ms. Maxwell, right?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. If you had answered all my questions today,
 18 it would have become clear that you were involved
 19 with Ms. Maxwell in sex trafficking of underage girls
 20 over a multiyear period, right?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. If you had answered all my questions today,

Page 357

1 J. Epstein - Confidential
 2 it would have become clear that Ms. Roberts has been
 3 telling the truth about Ms. Maxwell, right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Mr. Pagliuca asked about whether you had
 9 terminated relationships with Ms. Maxwell more than
 10 15 years ago.
 11 You would agree with me, sir, that the time
 12 period 2005 -- time period of 2005 would be inside
 13 the last 15 years, mathematically?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. You would agree that 2005 is less than
 19 15 years ago, as we sit here today, right?
 20 A. Yes.
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 BY MR. CASSELL:
 24 Q. In 2005, Maxwell had access to certain of
 25 your bank accounts, right?

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form.
 3 Foundation.
 4 You already asked these questions, by
 5 the way.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. In 2005, Maxwell had control on certain of
 9 your bank accounts, true?
 10 MR. PAGLIUCA: Object to form and
 11 foundation. Again, you already asked these
 12 questions.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. Previously I never had an opportunity to
 16 ask about who was the signatory on your accounts in
 17 2005. So I'd like to go over the signatories on your
 18 accounts in 2005.
 19 Were there any bank accounts in which
 20 Maxwell was a signator in 2005, any of your bank
 21 accounts?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

1 J. Epstein - Confidential
 2 foundation.
 3 I have a question. I've not seen any
 4 such bank records. So do you have them and
 5 have they been produced?
 6 MR. CASSELL: We'll deal with that
 7 concern later.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Was Eva Dubin ever your girlfriend?
 11 A. Fifth.
 12 Q. Please tell me everything you know about
 13 Eva Dubin.
 14 A. Fifth.
 15 Q. Have you ever had sex with Eva Dubin?
 16 A. Fifth.
 17 Q. You, in fact, have had sex with Eva Dubin,
 18 right?
 19 A. Fifth.
 20 Q. You paid for Eva Dubin to attend medical
 21 school, right?
 22 A. Fifth.
 23 Q. One of the reasons you paid for Eva Dubin
 24 to attend medical school was to keep her quiet about
 25 her knowledge of your sexual abuse of minors,

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Please describe for me all the signators on
 4 your bank accounts in 2005.
 5 A. Fifth.
 6 Q. I want to talk about the bank accounts that
 7 were used to take care of the day-to-day management
 8 of your Palm Beach mansion in 2005. Which bank was
 9 that account with?
 10 A. Fifth.
 11 Q. Who was a signatory on that particular
 12 account?
 13 A. Fifth.
 14 Q. If there are bank records that are produced
 15 in this case showing Ms. Maxwell as a signator on
 16 that account, would those bank records be accurate?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. It's fair to say that Ms. Maxwell was a
 22 signator on the bank account that was involved most
 23 heavily in the day-to-day operations of your West
 24 Palm Beach mansion, true?
 25 MR. PAGLIUCA: Object to form and

1 J. Epstein - Confidential
 2 correct?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. Why did you pay to send Eva Dubin to
 8 medical school?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Eva Dubin continues to be loyal to you
 14 today, true?
 15 MR. PAGLIUCA: Object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 MR. CASSELL: I'm getting close to the
 19 end. I think this might be a good time for
 20 me to confer with counsel for a few minutes.
 21 VIDEO TECHNICIAN: Off the record at
 22 1:56.
 23 (A recess was taken.)
 24 VIDEO TECHNICIAN: On the record at
 25 2:01.

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. I want to ask you some questions about a
 4 visit to a New York hospital.
 5 MR. CASSELL: Oh, great. Thank you.
 6 BY MR. CASSELL:
 7 Q. You and Ms. Maxwell took Virginia to a
 8 New York hospital when she was under the age of 18,
 9 correct?
 10 MR. PAGLIUCA: Object to form and
 11 foundation.
 12 THE WITNESS: Fifth.
 13 BY MR. CASSELL:
 14 Q. And at the time, Ms. Roberts was in great
 15 pain, true?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. Because of the pain Ms. Roberts was in, you
 21 and Ms. Maxwell handled the admission with the
 22 hospital, correct?
 23 MR. PAGLIUCA: Object to the form and
 24 foundation.
 25 THE WITNESS: Fifth.

1 J. Epstein - Confidential
 2 hospital that Virginia Roberts was?
 3 MR. PAGLIUCA: Object to form and
 4 foundation.
 5 THE WITNESS: Fifth.
 6 BY MR. CASSELL:
 7 Q. I'm going to ask you some questions about
 8 David Copperfield. You know David Copperfield,
 9 right?
 10 A. Fifth.
 11 Q. David Copperfield has been in your
 12 presence -- has been in your presence -- strike that.
 13 David Copperfield and you have been
 14 together in the presence of minor girls under the age
 15 of 18, right?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 THE WITNESS: Fifth.
 19 BY MR. CASSELL:
 20 Q. Have you ever provided girls under the age
 21 of 18 to David Copperfield for sexual purposes?
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 THE WITNESS: Fifth.
 25

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. And because you knew it would create
 4 complications if Ms. Maxwell was a minor under the
 5 age of 18, you and Ms. Maxwell represented that
 6 Virginia was 18, true?
 7 MR. PAGLIUCA: Object to form and
 8 foundation.
 9 THE WITNESS: State your -- you want to
 10 repeat your question?
 11 MR. CASSELL: Sure.
 12 THE WITNESS: I think you said
 13 Miss Maxwell was under the age of 18.
 14 MR. CASSELL: Let me strike the last
 15 question and re-ask it. Thank you.
 16 BY MR. CASSELL:
 17 Q. Because you knew it would create
 18 complications if Ms. Roberts was a minor under the
 19 age of 18, you and Ms. Maxwell represented that
 20 Miss Roberts was 18 years old, true?
 21 A. Fifth.
 22 MR. PAGLIUCA: Object to form and
 23 foundation.
 24 BY MR. CASSELL:
 25 Q. How old did you tell the New York City

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. Based on everything I know in this case, it
 4 would seem logical that you provided girls under the
 5 age of 18 to David Copperfield for sexual purposes.
 6 Am I missing something if I reach that
 7 conclusion?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. With regard to the Palm Beach Police
 13 Department investigation, the Palm Beach Police
 14 Department identified many persons under the control
 15 of Ms. Maxwell, who had paid girls for underage sex?
 16 MR. PAGLIUCA: Object to form and
 17 foundation.
 18 BY MR. CASSELL:
 19 Q. True?
 20 A. There's no question.
 21 Q. True?
 22 MR. PAGLIUCA: Same objection.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. With regard to the girls that the Palm

Page 366

1 J. Epstein - Confidential
 2 Beach Police Department investigated, how were the
 3 payments made to those girls?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 BY MR. CASSELL:
 8 Q. Miss Maxwell was aware of all the payments
 9 that were going to the girls in the Palm Beach Police
 10 investigation, right?
 11 MR. PAGLIUCA: Object to form and
 12 foundation.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. In fact, Miss Maxwell had control of
 16 payments that were made to the girls in the Palm
 17 Beach Police Department investigation?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. Ms. Maxwell is one of your closest friends,
 23 true?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 367

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 BY MR. CASSELL:
 4 Q. How close is your relationship with
 5 Ms. Maxwell?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Can you name anyone who's a closer friend
 11 than yours over the last ten years than Miss Maxwell?
 12 MR. PAGLIUCA: Object to the form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 BY MR. CASSELL:
 16 Q. You can't name anyone who's been a closer
 17 friend of yours over the last ten years than
 18 Ms. Maxwell, right?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. The person that you have had the most
 24 sexual activity with over the last 20 years is
 25 Ms. Maxwell, true?

Page 368

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: Object to form and
 3 foundation.
 4 THE WITNESS: Fifth.
 5 BY MR. CASSELL:
 6 Q. Is there anyone over the last 20 years that
 7 you've had more sexual activity with than
 8 Ms. Maxwell?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 THE WITNESS: Fifth.
 12 BY MR. CASSELL:
 13 Q. Ms. Maxwell is the longest -- let me see.
 14 Strike that.
 15 You haven't had an intimate relationship
 16 with anyone for a longer period of time than
 17 Ms. Maxwell over the last two decades, have you?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 THE WITNESS: Fifth.
 21 BY MR. CASSELL:
 22 Q. Through legal counsel and other means, you
 23 have been coordinating with Ms. Maxwell with regard
 24 to this litigation, right?
 25 MR. PAGLIUCA: Object to form and

Page 369

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 MR. GOLDBERGER: Attorney-client
 5 privilege.
 6 BY MR. CASSELL:
 7 Q. You purchased a town home in New York for
 8 Miss Maxwell for millions of dollars, true?
 9 MR. PAGLIUCA: Object to form and
 10 foundation.
 11 You've already asked this question.
 12 It's already been answered.
 13 THE WITNESS: Fifth.
 14 BY MR. CASSELL:
 15 Q. How are you coordinating with Ms. Maxwell
 16 on this litigation?
 17 MR. PAGLIUCA: Object to form and
 18 foundation.
 19 THE WITNESS: Fifth.
 20 BY MR. CASSELL:
 21 Q. You're hoping Ms. Maxwell prevails in this
 22 litigation, true?
 23 MR. PAGLIUCA: Object to form and
 24 foundation.
 25 THE WITNESS: Fifth.

Page 370

1 J. Epstein - Confidential
 2 BY MR. CASSELL:
 3 Q. What is your arrangement with Ms. Maxwell
 4 with regard to paying any settle -- any judgment that
 5 might be reached against her in this case?
 6 MR. PAGLIUCA: Object to form and
 7 foundation.
 8 THE WITNESS: Fifth.
 9 BY MR. CASSELL:
 10 Q. Ms. Maxwell has had discussions with you
 11 about whether you would pay a judgment in this action
 12 against her, right?
 13 MR. PAGLIUCA: Object to form and
 14 foundation.
 15 THE WITNESS: Fifth.
 16 BY MR. CASSELL:
 17 Q. Your interests in Ms. Maxwell are
 18 compatible in this case, true?
 19 MR. PAGLIUCA: Object to form and
 20 foundation.
 21 THE WITNESS: Fifth.
 22 BY MR. CASSELL:
 23 Q. Both you and Ms. Maxwell are hoping that
 24 the case would be dismissed, true?
 25 MR. PAGLIUCA: Object to form and

Page 371

1 J. Epstein - Confidential
 2 foundation.
 3 THE WITNESS: Fifth.
 4 BY MR. CASSELL:
 5 Q. Previously you sent e-mails to Ms. Maxwell
 6 indicating your desire to have the publicity in this
 7 case die down, right?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. If the case were to settle, that would help
 13 the publicity in this case die down, right?
 14 MR. PAGLIUCA: Object to form and
 15 foundation.
 16 THE WITNESS: Fifth.
 17 BY MR. CASSELL:
 18 Q. If this case were to resolve, that would be
 19 useful for your purposes and Maxwell's purposes,
 20 right?
 21 MR. PAGLIUCA: Object to form and
 22 foundation.
 23 THE WITNESS: Fifth.
 24 BY MR. CASSELL:
 25 Q. You have also been coordinating with

Page 372

1 J. Epstein - Confidential
 2 Alan Dershowitz with regard to this litigation,
 3 right?
 4 MR. PAGLIUCA: Object to form and
 5 foundation.
 6 THE WITNESS: Fifth.
 7 MR. GOLDBERGER: And attorney-client
 8 privilege.
 9 BY MR. CASSELL:
 10 Q. You are in a joint defense arrangement with
 11 Alan Dershowitz at this time?
 12 MR. PAGLIUCA: Object to form and
 13 foundation.
 14 THE WITNESS: Fifth.
 15 MR. GOLDBERGER: Attorney-client
 16 privilege -- I'm sorry. Attorney-client
 17 privilege, and to the extent there is a
 18 confidentiality agreement in place or -- or
 19 a joint defense agreement, I would object on
 20 that basis.
 21 BY MR. CASSELL:
 22 Q. You have a common interest agreement with
 23 Alan Dershowitz, right?
 24 MR. PAGLIUCA: Object to form and
 25 foundation.

Page 373

1 J. Epstein - Confidential
 2 THE WITNESS: Fifth.
 3 MR. GOLDBERGER: Attorney-client
 4 privilege.
 5 BY MR. CASSELL:
 6 Q. You have a common interest with
 7 Alan Dershowitz in this litigation, right?
 8 MR. PAGLIUCA: Object to form and
 9 foundation.
 10 THE WITNESS: Fifth.
 11 BY MR. CASSELL:
 12 Q. You have a common interest with
 13 Ghislaine Maxwell in this litigation, right?
 14 MR. PAGLIUCA: Asked and answered, this
 15 question. I'm going to object to form and
 16 foundation.
 17 THE WITNESS: Fifth.
 18 MR. CASSELL: I have no further
 19 questions.
 20 MR. PAGLIUCA: I have no additional
 21 questions.
 22 MR. GOLDBERGER: Excellent.
 23 MR. CASSELL: Thank you.
 24 VIDEO TECHNICIAN: The time is 2:08.
 25 This concludes the deposition.

Page 374

1 J. Epstein - Confidential
 2 MR. PAGLIUCA: I do want a transcript.
 3 THE COURT REPORTER: Do you have a
 4 standing order?
 5 MR. PAGLIUCA: Yeah. They should have
 6 whatever we want. I think it's E-Tran.
 7 THE COURT REPORTER: A rough
 8 transcript?
 9 MR. PAGLIUCA: I don't need a rough, I
 10 don't think.
 11 (Signature was not waived. The
 12 deposition concluded at 2:08 p.m.)
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 376

1 REPORTER'S CERTIFICATE
 2
 3 STATE OF FLORIDA
 4 COUNTY OF PALM BEACH
 5
 6 I, DARLINE MARIE WEST, RPR, certify that I was
 7 authorized to and did stenographically report the
 8 foregoing deposition; and that the transcript is a
 9 true record thereof.
 10
 11 I further certify that I am not a relative,
 12 employee, attorney, or counsel of any of the parties,
 13 nor am I a relative or employee of any of the
 14 parties' attorney or counsel connected with the
 15 action, nor am I financially interested in the
 16 action.
 17
 18 Dated this 13th day of September 2016.
 19
 20
 21
 22 _____
 23 DARLINE MARIE WEST, RPR
 24
 25

Page 375

1 CERTIFICATE OF OATH
 2
 3 STATE OF FLORIDA
 4 COUNTY OF PALM BEACH
 5
 6
 7 I, the undersigned authority, certify that
 8 JEFFREY EPSTEIN personally appeared before me and was
 9 duly sworn on September 9, 2016.
 10
 11 WITNESS my hand and official seal this 13th day
 12 of September 2016.
 13
 14
 15
 16 _____
 17 DARLINE MARIE WEST
 18 Notary Public
 19
 20 My Commission Expires:
 21 October 26, 2017
 22 #FF 060662
 23
 24
 25

Page 377

1 C E R T I F I C A T E
 2
 3 STATE OF FLORIDA
 4 COUNTY OF PALM BEACH
 5
 6 I, JEFFREY EPSTEIN, hereby certify that I
 7 have read the foregoing transcript of my deposition
 8 and that the statements contained therein, together
 9 with any additions or corrections made on the
 10 attached Errata Sheet, are true and correct.
 11
 12 Dated this ____ day of _____, 2016.
 13
 14
 15
 16 _____
 17 JEFFREY EPSTEIN
 18
 19 The foregoing certificate was subscribed to
 20 before me this ____ day of _____, 2016,
 21 by the witness who has produced a
 22 _____ as identification and who did
 23 not take an additional oath.
 24
 25 _____
 Notary Public
 my commission expires:











































































