Ca	se 1:15-cv-07433-LAP	Document 1328-15	Filed 01/05/24 Page 1 of 6	
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Page 1		Page
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA	1 2	IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUI IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 08-CIV-80119-MARRA/JOHNSON	3	CASE NO. 502008CA028051XXXXMB AB
		L.M.,
JANE DOE NO. 2,	5	Plaintiff,
Plaintiff, -vs- VOLUME I OF III		-vs- VOLUME I OF III
JEFFREY EPSTEIN,		JEFFREY EPSTEIN,
Defendant.	8	Defendant.
	9	
Related cases:	10	
08-80232, 08-08380, 08-80381, 08-80994	11	
08-80993, 08-80811, 08-80893, 09-80469 09-80591, 09-80656, 09-80802, 09-81092	12	VIDEOTAPED DEPOSITION OF
/ / / / / / / / / / / / / / / / / / / /	13	SARAH KELLEN
	14	Wednesday March 24 2010
VIDEOTAPED DEPOSITION OF	123	Wednesday, March 24, 2010 10:37 - 6:51 p.m.
SARAH KELLEN	16	10.57 O.51 p.m.
Wednesday, March 24, 2010	17	
10:37 - 6:51 p.m.	18	250 Australian Avenue South Suite 1500
250 Australian Avenue South	19	West Palm Beach, Florida 33401
Suite 1500	20	
West Palm Beach, Florida 33401	21	
TT.		Reported By:
Reported By:		Cynthia Hopkins, RPR, FPR
Cynthia Hopkins, RPR, FPR		Notary Public, State of Florida
Notary Public, State of Florida		Prose Court Reporting Services Job No.: 1484
Prose Court Reporting Services Job No.: 1484	25	
Page 2	1	Page
IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT	1	IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
IN AND FOR PALM BEACH COUNTY, FLORIDA	1	CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 502008CA028058XXXXMB AD	2	CASE No.502008CA037319XXXXMB AB
FIV	3	B.B.
E.W.,	4	b.b.
Plaintiff,		Plaintiff,
-vs- VOLUME I OF III	5	77522-77527-752-752-752-752-7
	10000	-vs- VOLUME I OF III
JEFFREY EPSTEIN,	D 20 2	JEFFREY EPSTEIN AND SARAH KELLEN,
Defendant.	8	ser on ANN M. E. ENDOUGHERTY
		Defendants.
THE POWER DEPOSITION OF	9	
VIDEOTAPED DEPOSITION OF	11	VIDEOTAPED DEPOSITION OF
SARAH KELLEN	12	SARAH KELLEN
Wednesday, March 24, 2010	13	W. I. J. M. 104 0010
10:37 - 6:51 p.m.	14	Wednesday, March 24, 2010 10:37 - 6:51 p.m.
7997	15	10.57 - 0.51 p.m.
250 Australian Avenue South	16	
Suite 1500	17	250 Australian Avenue South
West Palm Beach, Florida 33401	18	Suite 1500
CENTRAL CONTROL OF THE ACTION	19	West Palm Beach, Florida 33401
	20	
2	21	
Reported By:		Reported By:
Cynthia Hopkins, RPR, FPR Notary Public, State of Florida		Cynthia Hopkins, RPR, FPR
Prose Court Reporting Services		Notary Public, State of Florida
A AVOT COME AND CAME OF TANK		Prose Court Reporting Services
Job No.: 1484	24 .	Job No.: 1484

1 (Pages 1 to 4)

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	Page 21		Page 2
1	answer the question based on her Fifth	1	witness, and I will instruct the witness not to
2	Amendment privilege.	2	answer based on her Fifth Amendment privilege.
3	THE WITNESS: On the instruction of my	3	THE WITNESS: On the instruction of my
4	lawyer, I must invoke my Fifth Amendment right.	4	lawyer, I must invoke my Fifth Amendment righ
5	BY MR. KUVIN:	5	BY MR. KUVIN:
6	Q. Who introduced you to Jeffrey Epstein the	6	Q. Would you agree with me that
7	first time that you met him?	7	Jeffrey Epstein owns numerous planes, private
8	MR. RHEINHART: Same instruction.	8	planes?
9	THE WITNESS: On the instruction of my	9	MR. RHEINHART: Instruct the witness not
10	lawyer, I must invoke my Fifth Amendment right.	10	to answer.
11	BY MR. KUVIN:	11	THE WITNESS: On the instruction of my
12	Q. Did Ghislaine Maxwell introduce you to	12	lawyer, I must invoke my Fifth Amendment righ
13	Jeffrey Epstein for the first time?	13	BY MR. KUVIN:
14	MR. RHEINHART: Same instruction.	14	Q. And you've been on every one of those
15	THE WITNESS: On the instruction of my	15	private planes; isn't that true?
16	lawyer, I must invoke my Fifth Amendment right.	16	MR. RHEINHART: Object to the form. It
17	BY MR. KUVIN:	17	assumes facts not before the witness, and I
18	Q. When was the first time you were in	18	will instruct the witness not to answer based
19	Jeffrey Epstein's home located on El Brillo Way on	19	on her Fifth Amendment privilege.
20	Palm Beach Island?	20	THE WITNESS: On the instruction of my
21	MR. RHEINHART: Object to the form of the	21	lawyer, I must invoke my Fifth Amendment righ
22	question as compound and assuming facts not	22	BY MR. KUVIN:
23	before the witness. And I instruct the witness	23	Q. Ma'am, isn't it true that you've seen the
24	not to answer based on her Fifth Amendment	24	passenger manifest for Jeffrey Epstein's plane?
25	privilege.	25	MR. RHEINHART: Object to the form. It
	Page 22		Page 2
1	THE WITNESS: On the instruction of my	1	assumes facts that are not established as known
2	lawyer, I must invoke my Fifth Amendment right.	2	to this witness, and I instruct the witness not
3	BY MR. KUVIN:	3	to answer the question based on her Fifth
4	Q. Would you agree with me that	4	Amendment privilege.
5	Jeffrey Epstein owns a home at 358 El Brillo Way,	5	THE WITNESS: On the instruction of my
6	Palm Beach Island, Florida?	6	lawyer, I must invoke my Fifth Amendment right.
7	MR. RHEINHART: Instruct the witness not	7	MR. KUVIN: Let me show you what we'll
8	to answer based on her Fifth Amendment	8	mark as Exhibit 2.
9	the control of the co	9	mark as exhibit 2.
	privilege.	2000	(Disingtiff) Fullihit No. 2 was and of fam
10	THE WITNESS: On instruction of my	10	(Plaintiff's Exhibit No. 2 was marked for
11	counsel, I must invoke my Fifth Amendment	11	identification.)
12	right.	12	MR. KUVIN: Thank you.
13	BY MR. KUVIN:	13	MR. RHEINHART: Do you want to zoom in o
14	Q. Would you agree with me that you've been	14	it like you did the last time?
15	in that home numerous times?	15	MR. KUVIN: No, that's fine.
16	MR. RHEINHART: Instruct the witness not	16	MR. RHEINHART: Take your time.
17	to answer the question based on her Fifth	17	MR. KUVIN: And flip through.
18	Amendment privilege.	18	BY MR. KUVIN:
19	THE WITNESS: On instruction of my lawyer,	19	Q. All right. Ma'am, would you agree with me
20	I must invoke my Fifth Amendment right.	20	that this is a passenger manifest for one of
21	BY MR. KUVIN:	21	Jeffrey Epstein's airplanes?
22	Q. Would you agree with me that you have gone	22	MR. RHEINHART: Instruct the witness not
	on Jeffrey Epstein's plane numerous times?	23	to answer the question based on her Fifth
		Carrier 1995	
23 24 25	MR. RHEINHART: Object to the form. It assumes facts that are not present for the	24 25	Amendment privilege.  THE WITNESS: On the instruction of my

6 (Pages 21 to 24)

	Page 37		Page 39
1	THE VIDEOGRAPHER: We're now on video	1	personal knowledge and instruct her not to
2	record at 11:01 a.m.	2	answer based on her Fifth Amendment privilege.
3	MR. KUVIN: Just for the video record and	3	It's also compound.
4	for the written record Katherine Ezell and Amy	4	THE WITNESS: On the instruction of my
5	Ederi have now appeared and are present in	5	lawyer I must invoke my Fifth Amendment
6	person.	6	privilege.
7	MR. GOLDBERGER: Just one more matter for	7	BY MR. KUVIN:
8	the record. Jack Goldberger, on behalf of	8	Q. The witness says that you may not have
9	Jeffrey Epstein. Rather than impose a form	9	knowledge or we don't know whether you have
10	objection to every question, I think we have	10	knowledge regarding this passenger manifest, so let
11	reached an agreement that on behalf of	11	me ask you, do you have any knowledge about this
12	Mr. Epstein, I am adopting the form objections	12	passenger manifest?
13	that Mr. Rheinhart is making on behalf of his	13	MR. RHEINHART: Object to the form of the
14	client nunc pro tunc to the beginning of this	14	question as ambiguous as to this and what a
15	deposition.	15	manifest is, and also her knowledge, and I will
16	MR. KUVIN: No objection.	16	instruct her not to answer based on her Fifth
17	MR. GOLDBERGER: Okay.	17	Amendment privilege.
18	BY MR. KUVIN:	18	THE WITNESS: On the instruction of my
19	Q. All right. All right. Ms. Kellen, would	19	lawyer, I must invoke my Fifth Amendment
20	you agree with me that there was an agreement	20	privilege.
21	between Jeffrey Epstein, Ghislaine Maxwell,	21	BY MR. KUVIN:
22	Jean-Luc Brunel, yourself and Nadia Marcinkova to	22	Q. Based on the objection, do you know what a
23	bring in girls from out of state that were underage?	23	manifest is?
24	MR. RHEINHART: Object to the form of the	24	MR. RHEINHART: Object to the form of the
25	question as leading, as compound, and instruct	25	question as ambiguous and instruct her not to
	Page 38		Page 40
1	the witness not to answer based on her Fifth	1	answer based on her Fifth Amendment privilege.
2	Amendment privilege.	2	THE WITNESS: On the instruction of my
3	THE WITNESS: On the instruction of my	3	lawyer I must invoke my Fifth Amendment right.
4	lawyer I must invoke my Fifth Amendment right.	4	BY MR. KUVIN:
5	BY MR. KUVIN:	5	Q. Have you heard the word "manifest" before?
6	Q. Would you agree with me that there was an	6	MR. RHEINHART: I'll instruct the witness
7	agreement between Jeffrey Epstein,	7	not to answer based on her Fifth Amendment
8	Ghislaine Maxwell, Jean-Luc Brunel, yourself and	8	privilege.
9	Nadia Marcinkova to bring in girls that were	9	THE WITNESS: On the instruction of my
10	underage from out of state for sexual contact?	10	lawyer I must invoke my Fifth Amendment right.
		-	
1 1 1	MR. RHEINHART: Object to the form of the	11	
11	MR. RHEINHART: Object to the form of the question as leading and compound, and I	11 12	BY MR. KUVIN:
12	question as leading and compound, and I	12	BY MR. KUVIN:  Q. Would you agree with me, ma'am, that you
12 13	question as leading and compound, and I instruct the witness not to answer based on her	12 13	BY MR. KUVIN:  Q. Would you agree with me, ma'am, that you have seen this passenger manifest, listed as
12 13 14	question as leading and compound, and I instruct the witness not to answer based on her Fifth Amendment privilege.	12 13 14	BY MR. KUVIN:  Q. Would you agree with me, ma'am, that you have seen this passenger manifest, listed as Exhibit 3, in the past?
12 13 14 15	question as leading and compound, and I instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my	12 13	BY MR. KUVIN:  Q. Would you agree with me, ma'am, that you have seen this passenger manifest, listed as Exhibit 3, in the past?  MR. RHEINHART: I'll instruct the witness
12 13 14 15 16	question as leading and compound, and I instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment	12 13 14 15 16	BY MR. KUVIN:  Q. Would you agree with me, ma'am, that you have seen this passenger manifest, listed as Exhibit 3, in the past?  MR. RHEINHART: I'll instruct the witness not to answer based on her Fifth Amendment
12 13 14 15 16 17	question as leading and compound, and I instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment privilege.	12 13 14 15 16 17	BY MR. KUVIN:  Q. Would you agree with me, ma'am, that you have seen this passenger manifest, listed as Exhibit 3, in the past?  MR. RHEINHART: I'll instruct the witness not to answer based on her Fifth Amendment privilege.
12 13 14 15 16 17 18	question as leading and compound, and I instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment privilege.  BY MR. KUVIN:	12 13 14 15 16 17	BY MR. KUVIN:  Q. Would you agree with me, ma'am, that you have seen this passenger manifest, listed as Exhibit 3, in the past?  MR. RHEINHART: I'll instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my
12 13 14 15 16 17 18 19	question as leading and compound, and I instruct the witness not to answer based on her Fifth Amendment privilege. THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. All right. Let me show you what we've	12 13 14 15 16 17 18 19	BY MR. KUVIN:  Q. Would you agree with me, ma'am, that you have seen this passenger manifest, listed as Exhibit 3, in the past?  MR. RHEINHART: I'll instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment right.
12 13 14 15 16 17 18 19 20	question as leading and compound, and I instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment privilege.  BY MR. KUVIN:  Q. All right. Let me show you what we've premarked as Plaintiff's Exhibit 3. Do you	12 13 14 15 16 17 18 19 20	BY MR. KUVIN:  Q. Would you agree with me, ma'am, that you have seen this passenger manifest, listed as Exhibit 3, in the past?  MR. RHEINHART: I'll instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment right. BY MR. KUVIN:
12 13 14 15 16 17 18 19 20 21	question as leading and compound, and I instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment privilege.  BY MR. KUVIN:  Q. All right. Let me show you what we've premarked as Plaintiff's Exhibit 3. Do you recognize this as the passenger manifest for one of	12 13 14 15 16 17 18 19 20 21	BY MR. KUVIN:  Q. Would you agree with me, ma'am, that you have seen this passenger manifest, listed as Exhibit 3, in the past?  MR. RHEINHART: I'll instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment right. BY MR. KUVIN:  Q. Who is Zinta Broukis?
12 13 14 15 16 17 18 19 20 21 22	question as leading and compound, and I instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment privilege.  BY MR. KUVIN:  Q. All right. Let me show you what we've premarked as Plaintiff's Exhibit 3. Do you recognize this as the passenger manifest for one of Jeffrey Epstein's planes?	12 13 14 15 16 17 18 19 20 21	BY MR. KUVIN:  Q. Would you agree with me, ma'am, that you have seen this passenger manifest, listed as Exhibit 3, in the past?  MR. RHEINHART: I'll instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment right. BY MR. KUVIN:  Q. Who is Zinta Broukis?  MR. RHEINHART: I'll instruct the witness
12 13 14 15 16 17 18 19 20 21	question as leading and compound, and I instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment privilege.  BY MR. KUVIN:  Q. All right. Let me show you what we've premarked as Plaintiff's Exhibit 3. Do you recognize this as the passenger manifest for one of	12 13 14 15 16 17 18 19 20 21	BY MR. KUVIN:  Q. Would you agree with me, ma'am, that you have seen this passenger manifest, listed as Exhibit 3, in the past?  MR. RHEINHART: I'll instruct the witness not to answer based on her Fifth Amendment privilege.  THE WITNESS: On the instruction of my lawyer I must invoke my Fifth Amendment right. BY MR. KUVIN:  Q. Who is Zinta Broukis?

10 (Pages 37 to 40)

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	,	
Page 97		Page 99
1 MR. RHEINHART: Same instruction.	1	assumes facts that have not been established
2 THE WITNESS: On the instruction of my	2	and it's compound.
3 lawyer, I must invoke my Fifth Amendment	3	THE WITNESS: On the instruction of my
4 privilege.	4	lawyer, I must invoke my Fifth Amendment
5 BY MR. KUVIN:	5	privilege.
<ol> <li>Q. Have you ever worked as a professional</li> </ol>	6	MR. RHEINHART: And to clarify the
7 model?	7	objection is that it assumes that she's ever
8 MR. RHEINHART: May I consult?	8	met or knows anything about Jean-Luc Brunel.
9 MR. KUVIN: Sure.	9	BY MR. KUVIN:
10 MR. RHEINHART: You can answer the	10	Q. Were you ever promised anything regarding
11 question.	11	your modeling career by Jeffrey Epstein?
12 THE WITNESS: Yes.	12	MR. RHEINHART: Same objection, instruct
13 BY MR. KUVIN:	13	the witness not to answer.
14 Q. When?	14	THE WITNESS: On the instruction of my
15 A. I don't remember. I don't remember the dates.	15	lawyer, I must invoke my Fifth Amendment
16 It was at least maybe ten years ago.	16	privilege.
17 Q. And you're how old now?	17	BY MR. KUVIN:
18 MR. RHEINHART: I'll instruct the witness	18	Q. You would agree with me that there is a
19 not to answer the question. Nice try.	19	financial arrangement between Jean-Luc Brunel and
20 Instruct you not to answer based on	20	Jeffrey Epstein, do you not?
21 your Fifth Amendment privilege.	21	MR. RHEINHART: Objection. It assumes she
22 THE WITNESS: On the instruction of my	22	has any knowledge of either Mr. Epstein or
23 lawyer, I'm going to invoke my Fifth Amendment	23	Mr. Brunel, and as to that she is going to
24 privilege.	24	invoke her Fifth Amendment privilege. The
25 MR. KUVIN: I'm just trying to find out.	25	question is compound and therefore ambiguous.
Page 98		Page 100
1 MR. RHEINHART: Like I said, good try.	1	THE WITNESS: On the instruction of my
2 Move on.	2	lawyer, I must invoke my Fifth Amendment
3 BY MR. KUVIN:	3	privilege.
4 Q. With respect to your work as a	4	BY MR. KUVIN:
5 professional model, what company did you work for?	5	Q. Would you agree with me that
6 MR. RHEINHART: Instruct the witness not	6	Ghislaine Maxwell provides underage girls to
7 to answer based on the Fifth Amendment	7	Mr. Epstein for sex?
8 privilege.	8	MR. RHEINHART: Objection to the form. It
9 THE WITNESS: On the instruction of my	9	assumes she knows anything at all about
10 lawyer, I invoke my Fifth Amendment privilege.	10	Ghislaine Maxwell and asks her to assume that
11 BY MR. KUVIN:	11	she does, and therefore it is compound and
12 Q. What is your understanding of	12	ambiguous, and I would instruct her not to
13 Mr. Epstein's involvement with the modeling	13	answer.
14 industry?	14	THE WITNESS: Upon the instruction of my
15 MR. RHEINHART: Standing objection, and	1 7 5	larry on I must involve my Figh Amandment
<ul> <li>This are</li> <li>The control of the control of t</li></ul>	15	lawyer, I must invoke my Fifth Amendment
16 instruct the witness not to answer based on	16	privilege.
17 Fifth Amendment, on that basis.	16 17	privilege.  MR. KUVIN: That's a good point. Take a
Fifth Amendment, on that basis.  THE WITNESS: Upon the instruction of my	16 17 18	privilege.  MR. KUVIN: That's a good point. Take a look at what we'll mark as Exhibit 10.
17 Fifth Amendment, on that basis. 18 THE WITNESS: Upon the instruction of my 19 lawyer, I must invoke my Fifth Amendment	16 17 18 19	privilege.  MR. KUVIN: That's a good point. Take a look at what we'll mark as Exhibit 10.  (Plaintiff's Exhibit No. 10 was marked for
Fifth Amendment, on that basis.  THE WITNESS: Upon the instruction of my lawyer, I must invoke my Fifth Amendment privilege.	16 17 18 19 20	privilege.  MR. KUVIN: That's a good point. Take a look at what we'll mark as Exhibit 10.  (Plaintiff's Exhibit No. 10 was marked for identification.)
17 Fifth Amendment, on that basis. 18 THE WITNESS: Upon the instruction of my 19 lawyer, I must invoke my Fifth Amendment 20 privilege. 21 BY MR. KUVIN:	16 17 18 19 20 21	privilege.  MR. KUVIN: That's a good point. Take a look at what we'll mark as Exhibit 10.  (Plaintiff's Exhibit No. 10 was marked for
Fifth Amendment, on that basis.  THE WITNESS: Upon the instruction of my lawyer, I must invoke my Fifth Amendment privilege.  BY MR. KUVIN:  Q. Were you ever promised anything regarding	16 17 18 19 20 21 22	privilege.  MR. KUVIN: That's a good point. Take a look at what we'll mark as Exhibit 10.  (Plaintiff's Exhibit No. 10 was marked for identification.)
Fifth Amendment, on that basis.  THE WITNESS: Upon the instruction of my lawyer, I must invoke my Fifth Amendment privilege.  BY MR. KUVIN:  Q. Were you ever promised anything regarding your modeling career by Jean-Luc Brunel?	16 17 18 19 20 21 22 23	privilege.  MR. KUVIN: That's a good point. Take a look at what we'll mark as Exhibit 10.  (Plaintiff's Exhibit No. 10 was marked for identification.)  MR. KUVIN: All me to show it to the
Fifth Amendment, on that basis.  THE WITNESS: Upon the instruction of my lawyer, I must invoke my Fifth Amendment privilege.  BY MR. KUVIN:  Q. Were you ever promised anything regarding	16 17 18 19 20 21 22	privilege.  MR. KUVIN: That's a good point. Take a look at what we'll mark as Exhibit 10.  (Plaintiff's Exhibit No. 10 was marked for identification.)  MR. KUVIN: All me to show it to the camera first.

25 (Pages 97 to 100)

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	Page 445		Page 44
1	reasonably designed to lead to discoverable	1	deposition or you may waive reading and allow the
2	evidence.	2	court reporter to simply type it up and distribute
3	BY MS, EZELL:	3	it to the lawyers who order it.
4	Q. Did you facilitate these acts as well as	4	Do you choose to read or waive?
5	assisting Mr. Epstein in avoiding police detection?	5	THE WITNESS: Waive.
6	MR. REINHART: Same instruction.	6	MS. EZELL: Thank you.
7	BY MS. EZELL:	7	MR. REINHART: Thank you.
8	Q. Do you know when and by whom the computers	8	THE VIDEOGRAPHER: Okay, this conclude
9	were removed from the El Brillo mansion?	9	today's videotape deposition of Sarah Kellen. The
10	MR. REINHART: Objection to the form, lack of	10	time is 18:51.
11	foundation, and it also assumes knowledge of a	11	(Witness excused.)
12	place known as the El Brillo mansion. So instruct	12	(Deposition was concluded.)
13	the witness not to answer the question based on the	13	(5-56-001011 1135-00101131-001)
14	Fifth Amendment.	14	
15	THE WITNESS: At the instruction of my lawyer,	15	
16	I must invoke my Fifth Amendment right.	16	
17	BY MS. EZELL:	17	
18	Q. Was Jane No. 103 invited to just come and hang	18	
19	out at the El Brillo mansion?	19	
20		20	
21	MR. REINHART: Objection to the form, same as	21	
22	the previous question. It assumes knowledge of a	22	
	place known as the El Brillo mansion and a person		
23	by the name of Jane No. 103. It is compound and	23	
24	lacking in foundation.	24	
25	THE WITNESS: at the instruction of my lawyer,	25	
	Page 446		Page 448
1	I must invoke my Fifth Amendment right.	1	CERTIFICATE
2	BY MS. EZELL:	2	THE STATE OF FLORIDA COUNTY OF PALM BEACH
3	Q. Have you called any girls under the age of 18	4	COUNTY OF TABIN DEACH
4	in Palm Beach or West Palm Beach in the last six years?	5	I, Rachel W. Bridge, Registered Professional
5	MR. REINHART: For any purpose?	6	Reporter, Florida Professional Reporter and Notary Public in and for the State of Florida at large, do
6	MS. EZELL: Yes.		hereby certify that I was authorized to and did report
7	THE WITNESS: Can you repeat the question?	7	said deposition in stenotype; and that the foregoing
8	BY MS. EZELL:	8	pages are a true and correct transcription of my shorthand notes of said deposition.
9	Q. Have you called any girls under the age of 18	9	I further certify that said deposition was
10	in Palm Beach or West Palm Beach in the last six years?	10	taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and
11	MR. REINHART: You can answer that yes or no,	10	completed as hereinabove set out.
12	if you know.	11	AND THE PROPERTY OF THE PROPER
13	THE WITNESS: I don't think so.	12	I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or
14	MS. EZELL: I don't have any other questions.		employee of any attorney or counsel of party connected
15	Thank you.	13	with the action, nor am I financially interested in the
16	THE VIDEOGRAPHER: All set?	14	action,
17	MR. REINHART: Yes.		The foregoing certification of this transcript
18	THE VIDEOGRAPHER: This concludes today's	15	does not apply to any reproduction of the same by any
	E	16	means unless under the direct control and/or direction of the certifying reporter.
19	videotape deposition of Sarah Kellen.	17	Dated this 9th day of April, 20
20	MR. REINHART: Hold on, I'm sorry, one last	18 19	
21	thing. Since you're the last defense person or	20	PANA
22	plaintiff's lawyer standing, I guess you need to	21	Hachel W. Bridge, RIMR, CRR, FPR
		22	
23	advise her she has the right to read or waive on		
	the record.  MS. EZELL: You do have the right to read this	23 24 25	

21 (Pages 445 to 448)

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Electronically signed by Rachel Bridge (201-272-617-4627)

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