

EXHIBIT 14

(Filed Under Seal)

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,
Plaintiff,
-vs- VOLUME I OF III
JEFFREY EPSTEIN,
Defendant.

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

VIDEOTAPED DEPOSITION OF
SARAH KELLEN

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

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

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

Page 3

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

4 L.M.,
5 Plaintiff,
6 -vs- VOLUME I OF III
7 JEFFREY EPSTEIN,
8 Defendant.

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10
11
12 VIDEOTAPED DEPOSITION OF
13 SARAH KELLEN
14
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Page 2

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

4 E.W.,
5 Plaintiff,
6 -vs- VOLUME I OF III
7 JEFFREY EPSTEIN,
8 Defendant.

9
10
11 VIDEOTAPED DEPOSITION OF
12 SARAH KELLEN
13
14 Wednesday, March 24, 2010
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Page 4

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

4 B.B.,
5 Plaintiff,
6 -vs- VOLUME I OF III
7 JEFFREY EPSTEIN
8 AND SARAH KELLEN,
9 Defendants.

10
11 VIDEOTAPED DEPOSITION OF
12 SARAH KELLEN
13
14 Wednesday, March 24, 2010
15 10:37 - 6:51 p.m.

16
17 250 Australian Avenue South
18 Suite 1500
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1 answer the question based on her Fifth
 2 Amendment privilege.
 3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment right.
 5 BY MR. KUVIN:
 6 Q. Who introduced you to Jeffrey Epstein the
 7 first time that you met him?
 8 MR. RHEINHART: Same instruction.
 9 THE WITNESS: On the instruction of my
 10 lawyer, I must invoke my Fifth Amendment right.
 11 BY MR. KUVIN:
 12 Q. Did Ghislaine Maxwell introduce you to
 13 Jeffrey Epstein for the first time?
 14 MR. RHEINHART: Same instruction.
 15 THE WITNESS: On the instruction of my
 16 lawyer, I must invoke my Fifth Amendment right.
 17 BY MR. KUVIN:
 18 Q. When was the first time you were in
 19 Jeffrey Epstein's home located on El Brillo Way on
 20 Palm Beach Island?
 21 MR. RHEINHART: Object to the form of the
 22 question as compound and assuming facts not
 23 before the witness. And I instruct the witness
 24 not to answer based on her Fifth Amendment
 25 privilege.

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1 THE WITNESS: On the instruction of my
 2 lawyer, I must invoke my Fifth Amendment right.
 3 BY MR. KUVIN:
 4 Q. Would you agree with me that
 5 Jeffrey Epstein owns a home at 358 El Brillo Way,
 6 Palm Beach Island, Florida?
 7 MR. RHEINHART: Instruct the witness not
 8 to answer based on her Fifth Amendment
 9 privilege.
 10 THE WITNESS: On instruction of my
 11 counsel, I must invoke my Fifth Amendment
 12 right.
 13 BY MR. KUVIN:
 14 Q. Would you agree with me that you've been
 15 in that home numerous times?
 16 MR. RHEINHART: Instruct the witness not
 17 to answer the question based on her Fifth
 18 Amendment privilege.
 19 THE WITNESS: On instruction of my lawyer,
 20 I must invoke my Fifth Amendment right.
 21 BY MR. KUVIN:
 22 Q. Would you agree with me that you have gone
 23 on Jeffrey Epstein's plane numerous times?
 24 MR. RHEINHART: Object to the form. It
 25 assumes facts that are not present for the

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1 witness, and I will instruct the witness not to
 2 answer based on her Fifth Amendment privilege.
 3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment right.
 5 BY MR. KUVIN:
 6 Q. Would you agree with me that
 7 Jeffrey Epstein owns numerous planes, private
 8 planes?
 9 MR. RHEINHART: Instruct the witness not
 10 to answer.
 11 THE WITNESS: On the instruction of my
 12 lawyer, I must invoke my Fifth Amendment right.
 13 BY MR. KUVIN:
 14 Q. And you've been on every one of those
 15 private planes; isn't that true?
 16 MR. RHEINHART: Object to the form. It
 17 assumes facts not before the witness, and I
 18 will instruct the witness not to answer based
 19 on her Fifth Amendment privilege.
 20 THE WITNESS: On the instruction of my
 21 lawyer, I must invoke my Fifth Amendment right.
 22 BY MR. KUVIN:
 23 Q. Ma'am, isn't it true that you've seen the
 24 passenger manifest for Jeffrey Epstein's plane?
 25 MR. RHEINHART: Object to the form. It

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1 assumes facts that are not established as known
 2 to this witness, and I instruct the witness not
 3 to answer the question based on her Fifth
 4 Amendment privilege.
 5 THE WITNESS: On the instruction of my
 6 lawyer, I must invoke my Fifth Amendment right.
 7 MR. KUVIN: Let me show you what we'll
 8 mark as Exhibit 2.
 9
 10 (Plaintiff's Exhibit No. 2 was marked for
 11 identification.)
 12 MR. KUVIN: Thank you.
 13 MR. RHEINHART: Do you want to zoom in on
 14 it like you did the last time?
 15 MR. KUVIN: No, that's fine.
 16 MR. RHEINHART: Take your time.
 17 MR. KUVIN: And flip through.
 18 BY MR. KUVIN:
 19 Q. All right. Ma'am, would you agree with me
 20 that this is a passenger manifest for one of
 21 Jeffrey Epstein's airplanes?
 22 MR. RHEINHART: Instruct the witness not
 23 to answer the question based on her Fifth
 24 Amendment privilege.
 25 THE WITNESS: On the instruction of my

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1 THE VIDEOGRAPHER: We're now on video
 2 record at 11:01 a.m.
 3 MR. KUVIN: Just for the video record and
 4 for the written record Katherine Ezell and Amy
 5 Ederi have now appeared and are present in
 6 person.
 7 MR. GOLDBERGER: Just one more matter for
 8 the record. Jack Goldberger, on behalf of
 9 Jeffrey Epstein. Rather than impose a form
 10 objection to every question, I think we have
 11 reached an agreement that on behalf of
 12 Mr. Epstein, I am adopting the form objections
 13 that Mr. Rheinhart is making on behalf of his
 14 client nunc pro tunc to the beginning of this
 15 deposition.
 16 MR. KUVIN: No objection.
 17 MR. GOLDBERGER: Okay.
 18 BY MR. KUVIN:
 19 Q. All right. All right. Ms. Kellen, would
 20 you agree with me that there was an agreement
 21 between Jeffrey Epstein, Ghislaine Maxwell,
 22 Jean-Luc Brunel, yourself and Nadia Marcinkova to
 23 bring in girls from out of state that were underage?
 24 MR. RHEINHART: Object to the form of the
 25 question as leading, as compound, and instruct

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1 the witness not to answer based on her Fifth
 2 Amendment privilege.
 3 THE WITNESS: On the instruction of my
 4 lawyer I must invoke my Fifth Amendment right.
 5 BY MR. KUVIN:
 6 Q. Would you agree with me that there was an
 7 agreement between Jeffrey Epstein,
 8 Ghislaine Maxwell, Jean-Luc Brunel, yourself and
 9 Nadia Marcinkova to bring in girls that were
 10 underage from out of state for sexual contact?
 11 MR. RHEINHART: Object to the form of the
 12 question as leading and compound, and I
 13 instruct the witness not to answer based on her
 14 Fifth Amendment privilege.
 15 THE WITNESS: On the instruction of my
 16 lawyer I must invoke my Fifth Amendment
 17 privilege.
 18 BY MR. KUVIN:
 19 Q. All right. Let me show you what we've
 20 premarked as Plaintiff's Exhibit 3. Do you
 21 recognize this as the passenger manifest for one of
 22 Jeffrey Epstein's planes?
 23 MR. RHEINHART: I object to the form of
 24 the question. It assumes facts that this
 25 witness, evidence that this witness has no

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1 personal knowledge and instruct her not to
 2 answer based on her Fifth Amendment privilege.
 3 It's also compound.
 4 THE WITNESS: On the instruction of my
 5 lawyer I must invoke my Fifth Amendment
 6 privilege.
 7 BY MR. KUVIN:
 8 Q. The witness says that you may not have
 9 knowledge or we don't know whether you have
 10 knowledge regarding this passenger manifest, so let
 11 me ask you, do you have any knowledge about this
 12 passenger manifest?
 13 MR. RHEINHART: Object to the form of the
 14 question as ambiguous as to this and what a
 15 manifest is, and also her knowledge, and I will
 16 instruct her not to answer based on her Fifth
 17 Amendment privilege.
 18 THE WITNESS: On the instruction of my
 19 lawyer, I must invoke my Fifth Amendment
 20 privilege.
 21 BY MR. KUVIN:
 22 Q. Based on the objection, do you know what a
 23 manifest is?
 24 MR. RHEINHART: Object to the form of the
 25 question as ambiguous and instruct her not to

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1 answer based on her Fifth Amendment privilege.
 2 THE WITNESS: On the instruction of my
 3 lawyer I must invoke my Fifth Amendment right.
 4 BY MR. KUVIN:
 5 Q. Have you heard the word "manifest" before?
 6 MR. RHEINHART: I'll instruct the witness
 7 not to answer based on her Fifth Amendment
 8 privilege.
 9 THE WITNESS: On the instruction of my
 10 lawyer I must invoke my Fifth Amendment right.
 11 BY MR. KUVIN:
 12 Q. Would you agree with me, ma'am, that you
 13 have seen this passenger manifest, listed as
 14 Exhibit 3, in the past?
 15 MR. RHEINHART: I'll instruct the witness
 16 not to answer based on her Fifth Amendment
 17 privilege.
 18 THE WITNESS: On the instruction of my
 19 lawyer I must invoke my Fifth Amendment right.
 20 BY MR. KUVIN:
 21 Q. Who is Zinta Broukis?
 22 MR. RHEINHART: I'll instruct the witness
 23 not to answer based on her Fifth Amendment
 24 privilege.
 25 THE WITNESS: On the instruction of my

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1 MR. RHEINHART: Same instruction.
 2 THE WITNESS: On the instruction of my
 3 lawyer, I must invoke my Fifth Amendment
 4 privilege.
 5 BY MR. KUVIN:
 6 Q. Have you ever worked as a professional
 7 model?
 8 MR. RHEINHART: May I consult?
 9 MR. KUVIN: Sure.
 10 MR. RHEINHART: You can answer the
 11 question.
 12 THE WITNESS: Yes.
 13 BY MR. KUVIN:
 14 Q. When?
 15 A. I don't remember. I don't remember the dates.
 16 It was at least maybe ten years ago.
 17 Q. And you're how old now?
 18 MR. RHEINHART: I'll instruct the witness
 19 not to answer the question. Nice try.
 20 Instruct you not to answer based on
 21 your Fifth Amendment privilege.
 22 THE WITNESS: On the instruction of my
 23 lawyer, I'm going to invoke my Fifth Amendment
 24 privilege.
 25 MR. KUVIN: I'm just trying to find out.

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1 MR. RHEINHART: Like I said, good try.
 2 Move on.
 3 BY MR. KUVIN:
 4 Q. With respect to your work as a
 5 professional model, what company did you work for?
 6 MR. RHEINHART: Instruct the witness not
 7 to answer based on the Fifth Amendment
 8 privilege.
 9 THE WITNESS: On the instruction of my
 10 lawyer, I invoke my Fifth Amendment privilege.
 11 BY MR. KUVIN:
 12 Q. What is your understanding of
 13 Mr. Epstein's involvement with the modeling
 14 industry?
 15 MR. RHEINHART: Standing objection, and
 16 instruct the witness not to answer based on
 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:
 22 Q. Were you ever promised anything regarding
 23 your modeling career by Jean-Luc Brunel?
 24 MR. RHEINHART: Instruct the witness not
 25 to answer based on Fifth Amendment, also

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1 assumes facts that have not been established
 2 and it's compound.
 3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment
 5 privilege.
 6 MR. RHEINHART: And to clarify the
 7 objection is that it assumes that she's ever
 8 met or knows anything about Jean-Luc Brunel.
 9 BY MR. KUVIN:
 10 Q. Were you ever promised anything regarding
 11 your modeling career by Jeffrey Epstein?
 12 MR. RHEINHART: Same objection, instruct
 13 the witness not to answer.
 14 THE WITNESS: On the instruction of my
 15 lawyer, I must invoke my Fifth Amendment
 16 privilege.
 17 BY MR. KUVIN:
 18 Q. You would agree with me that there is a
 19 financial arrangement between Jean-Luc Brunel and
 20 Jeffrey Epstein, do you not?
 21 MR. RHEINHART: Objection. It assumes she
 22 has any knowledge of either Mr. Epstein or
 23 Mr. Brunel, and as to that she is going to
 24 invoke her Fifth Amendment privilege. The
 25 question is compound and therefore ambiguous.

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1 THE WITNESS: On the instruction of my
 2 lawyer, I must invoke my Fifth Amendment
 3 privilege.
 4 BY MR. KUVIN:
 5 Q. Would you agree with me that
 6 Ghislaine Maxwell provides underage girls to
 7 Mr. Epstein for sex?
 8 MR. RHEINHART: Objection to the form. It
 9 assumes she knows anything at all about
 10 Ghislaine Maxwell and asks her to assume that
 11 she does, and therefore it is compound and
 12 ambiguous, and I would instruct her not to
 13 answer.
 14 THE WITNESS: Upon the instruction of my
 15 lawyer, I must invoke my Fifth Amendment
 16 privilege.
 17 MR. KUVIN: That's a good point. Take a
 18 look at what we'll mark as Exhibit 10.
 19 (Plaintiff's Exhibit No. 10 was marked for
 20 identification.)
 21 MR. KUVIN: All me to show it to the
 22 camera first.
 23 MR. RHEINHART: Okay.
 24 MR. KUVIN: Okay.
 25 THE WITNESS: Okay.

1 reasonably designed to lead to discoverable
 2 evidence.
 3 BY MS. EZELL:
 4 Q. Did you facilitate these acts as well as
 5 assisting Mr. Epstein in avoiding police detection?
 6 MR. REINHART: Same instruction.
 7 BY MS. EZELL:
 8 Q. Do you know when and by whom the computers
 9 were removed from the El Brillo mansion?
 10 MR. REINHART: Objection to the form, lack of
 11 foundation, and it also assumes knowledge of a
 12 place known as the El Brillo mansion. So instruct
 13 the witness not to answer the question based on the
 14 Fifth Amendment.
 15 THE WITNESS: At the instruction of my lawyer,
 16 I must invoke my Fifth Amendment right.
 17 BY MS. EZELL:
 18 Q. Was Jane No. 103 invited to just come and hang
 19 out at the El Brillo mansion?
 20 MR. REINHART: Objection to the form, same as
 21 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
 24 lacking in foundation.
 25 THE WITNESS: at the instruction of my lawyer,

1 I must invoke my Fifth Amendment right.
 2 BY MS. EZELL:
 3 Q. Have you called any girls under the age of 18
 4 in Palm Beach or West Palm Beach in the last six years?
 5 MR. REINHART: For any purpose?
 6 MS. EZELL: Yes.
 7 THE WITNESS: Can you repeat the question?
 8 BY MS. EZELL:
 9 Q. Have you called any girls under the age of 18
 10 in Palm Beach or West Palm Beach in the last six years?
 11 MR. REINHART: You can answer that yes or no,
 12 if you know.
 13 THE WITNESS: I don't think so.
 14 MS. EZELL: I don't have any other questions.
 15 Thank you.
 16 THE VIDEOGRAPHER: All set?
 17 MR. REINHART: Yes.
 18 THE VIDEOGRAPHER: This concludes today's
 19 videotape deposition of Sarah Kellen.
 20 MR. REINHART: Hold on, I'm sorry, one last
 21 thing. Since you're the last defense person or
 22 plaintiff's lawyer standing, I guess you need to
 23 advise her she has the right to read or waive on
 24 the record.
 25 MS. EZELL: You do have the right to read this

1 deposition or you may waive reading and allow the
 2 court reporter to simply type it up and distribute
 3 it to the lawyers who order it.
 4 Do you choose to read or waive?
 5 THE WITNESS: Waive.
 6 MS. EZELL: Thank you.
 7 MR. REINHART: Thank you.
 8 THE VIDEOGRAPHER: Okay, this concludes
 9 today's videotape deposition of Sarah Kellen. The
 10 time is 18:51.
 11 (Witness excused.)
 12 (Deposition was concluded.)
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1 CERTIFICATE
 2 THE STATE OF FLORIDA
 3 COUNTY OF PALM BEACH
 4
 5 I, Rachel W. Bridge, Registered Professional
 6 Reporter, Florida Professional Reporter and Notary
 7 Public in and for the State of Florida at large, do
 8 hereby certify that I was authorized to and did report
 9 said deposition in stenotype; and that the foregoing
 10 pages are a true and correct transcription of my
 11 shorthand notes of said deposition.
 12 I further certify that said deposition was
 13 taken at the time and place hereinabove set forth and
 14 that the taking of said deposition was commenced and
 15 completed as hereinabove set out.
 16
 17 I further certify that I am not attorney or
 18 counsel of any of the parties, nor am I a relative or
 19 employee of any attorney or counsel of party connected
 20 with the action, nor am I financially interested in the
 21 action.
 22
 23 The foregoing certification of this transcript
 24 does not apply to any reproduction of the same by any
 25 means unless under the direct control and/or direction
 of the certifying reporter.
 Dated this 9th day of April, 20

Rachel W. Bridge
 Rachel W. Bridge, RMR, CRR, FPR

21 (Pages 445 to 448)

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

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