

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL  
CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and PAUL G.  
CASSELL,

Plaintiffs,

vs.

ALAN M. DERSHOWITZ,

Defendant.

\_\_\_\_\_ /

VIDEOTAPE CONTINUED DEPOSITION OF

ALAN M. DERSHOWITZ

VOLUME 4

Pages 462 through 647

Tuesday, January 12, 2016

1:05 p.m. - 4:45 p.m.

Tripp Scott

110 Southeast 6th Street

Fort Lauderdale, Florida

Stenographically Reported By:  
Kimberly Fontalvo, RPR, CLR  
Realtime Systems Administrator

1 Virginia Roberts and things that she has said, was  
2 she lying when she said that she has flown on  
3 Jeffrey Epstein's airplane?

4 MR. INDYKE: Objection. Work product and  
5 common interest.

6 A. I think I can answer that question. Based  
7 on material that was produced in discovery, which  
8 would not be subject to privilege, there seems to be  
9 evidence that she did fly on the airplane with  
10 Jeffrey Epstein.

11 BY MR. EDWARDS:

12 Q. Was she lying when she says that she was  
13 flown on Jeffrey Epstein's airplane across state  
14 lines at a time when she was under the age of 18?

15 A. I have no idea.

16 MR. INDYKE: Objection. Same objection.  
17 Work product and attorney-client and common  
18 interest.

19 A. I have no idea. But, again -- I just have  
20 no idea.

21 BY MR. EDWARDS:

22 Q. Is there any nonprivileged information  
23 that you could review that would give you an idea to  
24 answer that question or that would give you the  
25 answer to that question?

1 BY MR. EDWARDS:

2 Q. What we have here --

3 MR. INDYKE: Attorney-client, work product  
4 and common interests.

5 BY MR. EDWARDS:

6 Q. What we have here is only the fraction of  
7 flights where Dave Rogers was one of the pilots.  
8 Can you help us get the flight logs from Larry  
9 Visosky, Larry Morrison, any of the flight logs from  
10 the helicopters, et cetera?

11 A. I would love to. It would all show that I  
12 wasn't on the plane.

13 MR. INDYKE: Same objection, same  
14 instruction.

15 A. I will do everything in my power --

16 MR. SCOTT: You can make any request you  
17 want to through counsel, and we'll take them  
18 up.

19 A. But I will do everything in my power to  
20 get you every flight manifest.

21 SPECIAL MASTER POZZUOLI: Move forward.

22 MR. INDYKE: We do not waive any  
23 objection.

24 MR. SCAROLA: And that request has been  
25 made.

1 A. Is that a question?

2 MR. SCOTT: No. Just Mr. Scarola --

3 MR. EDWARDS: Just that we made a request  
4 for production.

5 BY MR. EDWARDS:

6 Q. Was Virginia lying when she says that she  
7 was taken to Jeffrey Epstein's home in New York  
8 while underage?

9 A. I have no idea.

10 MR. INDYKE: Same objection, same  
11 instruction.

12 BY MR. EDWARDS:

13 Q. Was Virginia lying when she says she was  
14 taken to Jeffrey Epstein's ranch in New Mexico while  
15 underage?

16 MR. INDYKE: Same objection, same  
17 instruction.

18 A. I can tell you this. She's lying when she  
19 said she met me at the ranch. So I cannot believe  
20 anything she says about the ranch.

21 BY MR. EDWARDS:

22 Q. Was she lying when she says Ghislaine  
23 Maxwell and Jeffrey Epstein used sex toys on her  
24 when she was underage?

25 MR. INDYKE: Same objection, same

1 instruction.

2 BY MR. EDWARDS:

3 Q. Was she lying when she says Jeffrey  
4 Epstein and Ghislaine Maxwell made her dress up in  
5 outfits for them?

6 MR. INDYKE: Same objection, same  
7 instruction.

8 A. Well, I can -- but I do have some material  
9 outside of the record on that.

10 BY MR. EDWARDS:

11 Q. Okay.

12 A. I know that Sigrid McCawley said that she  
13 said that Leslie Wexner made her dress up --

14 MS. MCCAWLEY: I am going to object to the  
15 extent that you are trying to reveal  
16 conversations that were part of a settlement  
17 discussion which the judge has already sealed  
18 the record on and there is a pending motion for  
19 sanctions. And if you're going to start  
20 revealing that information, we're going  
21 directly to the Judge Lynch.

22 A. I am going to start revealing --

23 SPECIAL MASTER POZZUOLI: No, I'm going to  
24 stop you --

25 THE WITNESS: Let me tell you why.

1           Because I didn't get that from Sigrid or from  
2           David Boise. I got it from Leslie Wexner's  
3           lawyer in a totally nonprivileged  
4           communication.

5           SPECIAL MASTER POZZUOLI: Let me stop you.  
6           I don't believe it's responsive to the question  
7           that's pending, so let's move forward.

8           BY MR. EDWARDS:

9           Q. My question was, was she lying -- was  
10          Virginia Roberts lying when she says Jeffrey Epstein  
11          and Ghislaine Maxwell made her dress up in outfits  
12          for them?

13          A. I can only say that that allegation has  
14          been made regarding Leslie Wexner as well.

15          Q. It has nothing to do with my question.

16          MR. SCAROLA: Move to strike.

17          A. Leslie Wexner's lawyer regards that as a  
18          full statement and, therefore, I can only assume  
19          that it's a false statement when made about someone  
20          else. I think that's relevant.

21          SPECIAL MASTER POZZUOLI: So with respect  
22          to the --

23          MR. EDWARDS: I'm moving to strike the  
24          nonresponsive portion of that answer.

25          THE WITNESS: He opened the door.

1                   SPECIAL MASTER POZZUOLI: I do believe it  
2                   was nonresponsive in its entirety. Move  
3                   forward. Go ahead.

4           BY MR. EDWARDS:

5           Q.    Do you know Jean-Luc Brunel?

6           A.    No.

7           Q.    Have you ever met him?

8                   MR. INDYKE: Same objection, same  
9                   instruction.

10           A.    I have no memory of ever meeting a man by  
11           that name.

12           BY MR. EDWARDS:

13           Q.    Do you know what his role was in Jeffrey  
14           Epstein's life?

15           A.    No.

16                   MR. INDYKE: Same objection, same  
17                   instruction. Mr. Dershowitz, if you would let  
18                   me make my objections before you respond.

19                   THE WITNESS: Right.

20           BY MR. EDWARDS:

21           Q.    Was Virginia Roberts lying when she said  
22           Jeffrey Epstein socialized with Bill Clinton during  
23           the relevant time period?

24                   MR. INDYKE: Same objection, same  
25                   instructions.

1           A.    My information is that Virginia Roberts  
2   was lying when she said that she saw Bill Clinton on  
3   Jeffrey Epstein's island. That's all I can comment  
4   about with that. And she's lying about that. And  
5   she's lying about how Bill Clinton got to the  
6   island.

7           MR. EDWARDS: I move to strike the  
8   Nonresponsive portion of the answer.

9           SPECIAL MASTER POZZUOLI: No, it's  
10   relevant to what you asked. Move forward. I'm  
11   not going to strike it.

12   BY MR. EDWARDS:

13           Q.    I'm going to go back to the question until  
14   I get an answer, though.

15           SPECIAL MASTER POZZUOLI: Go ahead.

16   BY MR. EDWARDS:

17           Q.    That is, when Virginia Roberts said that  
18   during the relevant time period, which we defined as  
19   1999 through 2002 --

20           A.    Let's be clear. Around August of both of  
21   those years, right?

22           Q.    I think August of '99 through October of  
23   2002.

24           A.    September, I think it is.

25           Q.    Okay. Was she lying -- was Virginia



1     Roberts lying when she said Jeffrey Epstein  
2     socialized with Bill Clinton during that time  
3     period?

4             A.     I don't know.

5                    MR. INDYKE: Same objection, same  
6             instruction.

7             BY MR. EDWARDS:

8             Q.     And you have no nonprivileged information  
9     that would provide you the answer to that?

10            A.     I have nonprivileged information that  
11     provides me that they socialized together at some  
12     point. I don't know whether it was within that  
13     timeframe at all. I know they went to Africa  
14     together on a mission of goodwill, but I don't know  
15     the date of that. So I can't tell you whether it  
16     was in the period or outside the period. You may  
17     know that; I don't.

18            Q.     Well, if Jeffrey Epstein and Bill Clinton  
19     associated, but only at some time period either  
20     before or after the relevant time period, it would  
21     immediately disprove her statement that Bill Clinton  
22     and Jeffrey Epstein socialized during that time  
23     period?

24            A.     I don't understand that question.

25            Q.     No?

1           SPECIAL MASTER POZZUOLI: I don't  
2           understand the question either. If you can  
3           rephrase the question, that would be helpful.

4           MR. EDWARDS: Sure.

5           BY MR. EDWARDS:

6           Q. If you -- do you know from nonprivileged  
7           information whether Jeffrey Epstein and Bill Clinton  
8           ever socialized?

9           A. Yes.

10          Q. Do you know the beginning -- when their  
11          relationship began?

12          MR. INDYKE: Objection. Same objection,  
13          same instruction.

14          SPECIAL MASTER POZZUOLI: Again, under  
15          nonprivileged.

16          MR. EDWARDS: Under nonprivileged  
17          information.

18          MR. SCOTT: Do you have any nonprivileged  
19          information about that?

20          A. I remember having dinner at the home of  
21          Caroline Kennedy and Ed Schlossberg with President  
22          Clinton, and he basically asked me how Jeffrey was  
23          doing, and led me to believe that he had some  
24          relationship with Jeffrey. I don't remember whether  
25          that dinner -- when that dinner was. I can probably

1 find out. But that would be nonprivileged.

2 BY MR. EDWARDS:

3 Q. Was he still President at the time that  
4 conversation was taking place?

5 A. I don't remember.

6 Q. Have you ever been, yourself, together  
7 with Jeffrey Epstein and Bill Clinton?

8 A. No.

9 Q. Have you ever talked to Jeffrey Epstein  
10 about Bill Clinton?

11 MR. INDYKE: Objection. Same objection,  
12 same instruction.

13 SPECIAL MASTER POZZUOLI: Nonprivileged.

14 MR. EDWARDS: Yeah, nonprivileged.

15 A. It's hard to sort out the privileged and  
16 the nonprivileged.

17 SPECIAL MASTER POZZUOLI: So based upon  
18 the objection, I would ask that you -- unless  
19 it's obvious, then no, until we sort that out.

20 A. I shouldn't answer that probably.

21 SPECIAL MASTER POZZUOLI: I'm going to  
22 grant his objection at this point, again, as a  
23 continuum because I want to make sure that we  
24 preserve this issue for later on.

25

1 BY MR. EDWARDS:

2 Q. In a previous -- previously in this  
3 deposition, you indicated your representation of  
4 Jeffrey Epstein on this subject matter began in  
5 2005, right?

6 A. It began, I think I said, when the first  
7 allegations were. I don't have an exact date in  
8 mind.

9 Q. The relevant time period for Virginia  
10 Roberts, as we've defined, is 1999 through 2002.

11 A. That's correct, yes.

12 Q. So I'm asking if you know from Jeffrey  
13 Epstein, in a time period prior to your  
14 representation, whether he was socializing with Bill  
15 Clinton.

16 MR. INDYKE: Same objection, same  
17 instruction.

18 A. Yes, yes.

19 MR. SCOTT: As long as it's a  
20 nonprivileged situation.

21 A. He was.

22 BY MR. EDWARDS:

23 Q. He was?

24 A. He was.

25 Q. So prior --

1           A.    During the whole period of time up through  
2   2005, you're saying?  Yes.

3           Q.    Right.

4           A.    Yes, I think this dinner occurred before  
5   2005, so I would -- yes.

6           Q.    So what did Jeffrey Epstein tell you about  
7   his relationship with Bill Clinton?

8                   MR. INDYKE:  Same objection, same  
9   instruction.

10          BY MR. EDWARDS:

11          Q.    Prior to 2005, obviously.

12          A.    That they knew each other and that they  
13   were doing some charitable work together.

14          Q.    Had Bill Clinton ever been to Jeffrey  
15   Epstein's home?

16          A.    I'm not aware.

17                   MR. INDYKE:  Same objection, same  
18   instruction.

19          BY MR. EDWARDS:

20          Q.    What kind of charitable work was Jeffrey  
21   Epstein --

22          A.    I can tell you Donald Trump has been to  
23   Jeffrey Epstein's home, and I've seen him there.

24          Q.    Okay.  What question do you think that  
25   you're answering?

1           A.    Well, you're asking about general things  
2   people --

3                   SPECIAL MASTER POZZUOLI:   Let's move  
4           forward.

5           A.    -- so I mean, I gave you an example of one  
6   who has been there.

7           BY MR. EDWARDS:

8           Q.    Okay. I'm specifically talking about  
9   when -- we started with was Virginia lying when she  
10   said that Jeffrey Epstein socialized with Bill  
11   Clinton during the relevant time period. And now  
12   I'm drilling it.

13          A.    I don't know the answer to that.

14          Q.    Okay. Did you understand -- did Bill  
15   Clinton travel with Jeffrey Epstein?

16          A.    My understanding from newspaper --

17                   MR. INDYKE: Same objection, same  
18           instruction.

19          A.    My understanding from newspaper accounts  
20   is that they went to Africa together with some other  
21   famous people, and I think maybe went to Asia  
22   together as well. So the answer is yes, I am aware  
23   through nonprivileged sources that they traveled  
24   together, yes.

25                   MR. SCOTT: Can we take a break in a few

1 minutes? I would like -- in the afternoon, he  
2 gets a little tired, so I would like to, every  
3 hour or so, take -- an hour and ten minutes,  
4 take a couple-minute break.

5 SPECIAL MASTER POZZUOLI: You tell me when  
6 is a good --

7 MR. EDWARDS: Maybe 15 minutes and we'll  
8 switch topics, and we can take a break. Good,  
9 Tom?

10 MR. SCOTT: Yes.

11 MR. EDWARDS: Okay.

12 BY MR. EDWARDS:

13 Q. Was Virginia Roberts lying when she says  
14 she was introduced to Prince Andrew through Jeffrey  
15 Epstein?

16 MR. INDYKE: Same objection, same  
17 instruction.

18 SPECIAL MASTER POZZUOLI: Under  
19 non-privileged information.

20 A. I have seen a photograph of Prince Andrew  
21 and Virginia Roberts and Ghislaine Maxwell. I have  
22 myself met Prince Andrew. He came to my class at  
23 Harvard Law School and there was a dinner for him,  
24 and he asked about Jeffrey Epstein. We discussed  
25 Jeffrey Epstein.

1 BY MR. EDWARDS:

2 Q. I don't know if this was -- I believe it  
3 was attached to the deposition last time.

4 A. That's the photograph.

5 MR. SCOTT: I think it was.

6 MR. SCAROLA: It was.

7 MR. EDWARDS: I think it was, too.

8 MR. SCOTT: It was.

9 BY MR. EDWARDS:

10 Q. So you're familiar with this photograph?

11 A. Yes, and I'm also familiar there's no  
12 comparable photograph with me in it.

13 Q. Okay.

14 MR. SCAROLA: That's not responsive.

15 SPECIAL MASTER POZZUOLI: Move forward.

16 MR. SCAROLA: Move to strike.

17 BY MR. EDWARDS:

18 Q. And in this photograph, this is Prince  
19 Andrew over here on the left?

20 A. That's true, yeah.

21 Q. And this is Virginia Roberts in the  
22 middle?

23 A. I've never seen -- I've never met  
24 Ms. Roberts, never seen her.

25 Q. So are you saying that she is lying when



1 she says that's her?

2 A. No, I just don't -- I've never seen her.

3 MR. SCOTT: Objection, argumentative.

4 A. Those are photographs -- I've seen  
5 photographs --

6 SPECIAL MASTER POZZUOLI: Hang on one  
7 second. Reask -- rephrase the question.

8 BY MR. EDWARDS:

9 Q. And who is this over here on the --

10 SPECIAL MASTER POZZUOLI: No, rephrase the  
11 question, the previous question about who the  
12 young lady is next to Prince Andrew.

13 BY MR. EDWARDS:

14 Q. Sure. Do you know who this lady is in the  
15 middle of this photograph?

16 A. On the basis of newspaper accounts, it is  
17 reported that she is Virginia Roberts. I wouldn't  
18 be able -- if you had shown me that picture a year  
19 and 16 days ago, I would not have been able to tell  
20 you that that's Virginia Roberts because I didn't  
21 know who she was.

22 Q. And who is the other person that's in this  
23 photograph?

24 A. Ghislaine Maxwell.

25 Q. And that's somebody else that you know,

1 correct?

2 A. I do.

3 Q. And you know her through Jeffrey Epstein,  
4 right?

5 MR. INDYKE: Same objection, same  
6 instruction.

7 A. I wrote an article about her father's  
8 death years ago, and I don't remember if I met her  
9 independently. I do remember meeting her through  
10 her -- I remember that the Lady Rothschild asked me  
11 to meet Jeffrey Epstein, and when Jeffrey Epstein  
12 came to meet me, he was with Ghislaine Maxwell.

13 BY MR. EDWARDS:

14 Q. And when was that?

15 A. The first time I Jeffrey Epstein, which  
16 would have been in the summer of Leslie Wexner's  
17 59th birthday. That's all I can tell you is the  
18 summer of his 59th birthday because I then flew with  
19 Jeffrey Epstein to Leslie Wexner's 59th birthday. I  
20 was presented to Leslie Wexner. Leslie would like  
21 to get as birthday gifts interesting people that his  
22 friends had met during the year, and so I was  
23 Jeffrey Epstein's intellectual gift to Leslie  
24 Wexner. And it was that year that I met Jeffrey  
25 Epstein. That's the best I can date it.

1 Q. Okay. And Ghislaine Maxwell, you are  
2 aware, is involved in litigation with Virginia  
3 Roberts right now, correct?

4 A. She is being sued by Virginia Roberts for  
5 defamation, not for the underlying offenses, which  
6 are beyond the statute of limitations, as I  
7 understand it, correct.

8 Q. And have you spoken with Ghislaine Maxwell  
9 about the allegations against her and her denials?

10 MR. INDYKE: Same objection, same  
11 instruction.

12 MR. SCOTT: Don't answer it. It's  
13 privileged.

14 BY MR. EDWARDS:

15 Q. I'm asking about your conversations with  
16 Ghislaine Maxwell, who's in a separate litigation,  
17 civil litigation for defamation. Have you  
18 personally spoken with Ghislaine Maxwell since these  
19 allegations?

20 A. If there's no objection, I will answer.

21 MR. INDYKE: There was an objection. Same  
22 objection, same instruction.

23 BY MR. EDWARDS:

24 Q. Is there a joint defense agreement related  
25 to the civil allegation -- actions regarding the

1     defamation actions that involve Ghislaine Maxwell  
2     and yourself?

3             MR. INDYKE: Same objection.

4             SPECIAL MASTER POZZUOLI: What's the  
5     basis -- can you explain to me what the basis  
6     of the objection is -- and what was the  
7     question?

8             MR. EDWARDS: Has Mr. Dershowitz spoken  
9     with Ghislaine Maxwell since the allegations --  
10    since this defamation suit came about as well  
11    as the defamation suit with Ghislaine Maxwell.

12    BY MR. EDWARDS:

13            Q.    Let me ask it cleaner. Have you spoken  
14    with Ghislaine Maxwell since January 2015?

15            MR. INDYKE: Same objection, same  
16    instruction.

17    BY MR. EDWARDS:

18            Q.    So that I'm clear, there is a joint  
19    defense of the allegations regarding Ghislaine  
20    Maxwell that's New York litigation and this  
21    defamation case?

22            MR. INDYKE: There's a common interest  
23    agreement in effect with respect to the  
24    New York case and a common interest agreement  
25    with respect to this case.

1 BY MR. EDWARDS:

2 Q. Okay. Was Virginia Roberts lying when she  
3 says that she was taken by Ghislaine Maxwell and --

4 MR. SCAROLA: Who negotiated the agreement  
5 and when?

6 BY MR. EDWARDS:

7 Q. Is there a common interest agreement in  
8 existence with respect to the allegations that have  
9 arisen since January of 2015 or that you contend  
10 covers that?

11 MR. INDYKE: Same objection, same  
12 instruction.

13 BY MR. EDWARDS:

14 Q. If there is, who negotiated this  
15 agreement?

16 MR. SCAROLA: Can we have a ruling on  
17 propriety?

18 SPECIAL MASTER POZZUOLI: You haven't  
19 pushed me, so I let you go.

20 MR. SCAROLA: Can we have a ruling as to  
21 whether we get to know whether Mr. Dershowitz  
22 is a party to a common interest agreement with  
23 Ghislaine Maxwell?

24 SPECIAL MASTER POZZUOLI: Counsel --

25 MS. McCAWLEY: Also, just this is Sigrid

1 McCawley, if any of the individuals on the  
2 phone are representing Ghislaine Maxwell, my  
3 understanding is the person on the phone is  
4 representing Jeffrey Epstein, not Ghislaine  
5 Maxwell. That needs to be clarified.

6 MR. INDYKE: Correct. Correct.

7 SPECIAL MASTER POZZUOLI: The answer is  
8 correct?

9 MR. INDYKE: With respect to Mr. Epstein,  
10 I can tell you there's a common interest  
11 agreement with respect to this matter and a  
12 common interest agreement with respect to the  
13 Ghislaine Maxwell suit in New York.

14 SPECIAL MASTER POZZUOLI: Is  
15 Mr. Dershowitz party to that?

16 MR. INDYKE: Mr. Dershowitz is party to a  
17 common interest agreement with Jeffrey in this  
18 case. And I believe -- I'd have to check, but  
19 I believe that that would extend --

20 MR. SCAROLA: We want an answer from the  
21 witness as to whether the witness is a party to  
22 a common interest agreement with Ghislaine  
23 Maxwell.

24 SPECIAL MASTER POZZUOLI: Then ask the  
25 question, because I haven't seen the question

1           asked yet.

2           BY MR. EDWARDS:

3           **Q.    Are you a party to a common interest**  
4 **agreement with Ghislaine Maxwell?**

5           A.    If there's no objection, I'll answer it.

6                   MR. INDYKE:  I apologize.  I thought we  
7           were still operating under the original set of  
8           objections.  So I will repeat it.  Same  
9           objection, same instruction.

10                   SPECIAL MASTER POZZUOLI:  With respect to  
11           that question, you can answer.

12           A.    My understanding is that I am still  
13   Jeffrey Epstein's lawyer.  Jeffrey Epstein, I  
14   understand, has a common interest or joint defense  
15   agreement with Ghislaine Maxwell, so I have -- my  
16   understanding is that I am bound by a common  
17   agreement.

18           BY MR. EDWARDS:

19           **Q.    Is this the same common interest agreement**  
20 **that we were talking about from 2005, or is this a**  
21 **separate common interest agreement that has been**  
22 **signed as a consequence of the lawsuits that have**  
23 **been filed since January 2015?**

24                   MR. INDYKE:  If this is a new question,  
25           I'll assert the same objection and the same

1 instruction.

2 SPECIAL MASTER POZZUOLI: And I'm going to  
3 overrule the objection. And you can answer  
4 that.

5 A. My understanding is that it's a  
6 combination; that is, it reflects the previous  
7 agreement and that there is a new agreement that  
8 supplemented the previous agreement.

9 BY MR. EDWARDS:

10 Q. When you say it's your understanding, is  
11 this understanding in writing; meaning, is there a  
12 written common interest agreement that has been put  
13 in place since January of 2015?

14 A. I don't know.

15 MR. INDYKE: Same objection, same  
16 instruction.

17 MR. SCOTT: Can we take a recess when we  
18 get a chance?

19 SPECIAL MASTER POZZUOLI: Yes, but I'm  
20 going to instruct you --

21 A. I don't know. I don't know the answer to  
22 that, whether there's additional writing or not.

23 BY MR. EDWARDS:

24 Q. Last question, then we take a break. Have  
25 you signed any such agreement --



1 MR. INDYKE: Same objection, same  
2 instruction.

3 BY MR. EDWARDS:

4 Q. -- since January 2015?

5 A. Since January? Not to my recollection.

6 MR. EDWARDS: We can take a break.

7 VIDEOGRAPHER: Going off the record. The  
8 time is approximately 2:09 p.m.

9 (Recess was held from 2:09 p.m. until 2:26 p.m.)

10 VIDEOGRAPHER: Going back on the record.  
11 Time is approximately 2:26 p.m.

12 BY MR. EDWARDS:

13 Q. Going back to the photograph, was Virginia  
14 Roberts lying when she says that she was taken to  
15 London where this photograph was taken?

16 A. I have no idea.

17 MR. INDYKE: Same objection, same  
18 instructions.

19 BY MR. EDWARDS:

20 Q. Was Virginia Roberts lying when she says  
21 that she was paid to have sex with Prince Andrew?

22 MR. INDYKE: Same objection, same  
23 instructions.

24 A. Can you tell me what age she was when that  
25 happened?

1 BY MR. EDWARDS:

2 Q. The photograph is printed in March of  
3 2001, which is when she's 17, which just means that  
4 the photograph was taken sometime before that date.  
5 So she was at least as young as 17 is the best that  
6 I can tell you.

7 A. Under the age of consent, that would be an  
8 act of prostitution. If she was paid \$15,000 to  
9 have sex with Prince Andrew at the age of 17 in  
10 England, she would be guilty of prostitution.

11 Q. My question is, was she lying when she  
12 says that she was paid to have sex with Prince  
13 Andrew?

14 A. I have no idea.

15 Q. You have met Prince Andrew, right?

16 A. I have.

17 Q. He sat in the back of your classrooms?

18 MR. SCOTT: Objection, asked and answered  
19 twice.

20 A. Once, yes.

21 BY MR. EDWARDS:

22 Q. I think we went to Jeffrey Epstein sitting  
23 in your classrooms, but now I'm talking about Prince  
24 Andrew sat in your classroom as well, right?

25 A. Yes, once.

1 MR. SCOTT: I thought we went through  
2 Andrew before; maybe I'm wrong.

3 BY MR. EDWARDS:

4 Q. Have you, since the -- since January of  
5 2015, have you contacted Prince Andrew?

6 A. No. I got a Christmas card from him.

7 Q. Have you spoke with him about the  
8 allegations that were alleged against Prince Andrew?

9 A. Not to him, but to -- not to him.

10 Q. Have you spoke to some representative of  
11 his, of Prince Andrew?

12 A. I need to know whether --

13 MR. INDYKE: Guy, sorry, I was just cut  
14 off for some reason.

15 SPECIAL MASTER POZZUOLI: Hold on a  
16 second. Go ahead and restate your question  
17 so -- Darren, can you hear now?

18 MR. INDYKE: Yes, I can.

19 BY MR. EDWARDS:

20 Q. My question is, have you spoken with  
21 Prince Andrew or any representative of or for Prince  
22 Andrew since January of 2015?

23 MR. SCOTT: If any of that involved work  
24 product on our part, I am instructing you not  
25 to answer.