NOTES OF QUOTES AND STATEMENTS FROM DEPOSITION TRANSCRIPTS

I. Deposition of L.M.

Although L.M. has sought in her civil case against Epstein to portray herself as an innocent, who was damaged by her interactions with Epstein, both her behavior and her own sworn statements during the course of her deposition in her civil case belie her claims. Repeatedly throughout the course of her deposition, L.M. engaged in the frequent use of profanity and personal attacks on Epstein's counsel. For example, during her deposition, L.M. made the following comments:

A: You're an asshole.
Q: You were a –
A: You're a fucking asshole.
(see Depo Transcript 130:10-19)

A: You are just fucking sitting here making money.
(see Depo Transcript 132:9-10)

Q: Ok, you were partying, right?
A: Yeah, like normal people do like you're going to probably do after this with all your fucking money.
(see Depo Transcript 133:3-5)

Q: . . . Let's be honest.
A: Okay. Let's be honest.
Q: Did you ever send?
A: Yeah Jackass. You're a fucking asshole.
(see Depo Transcript 225:19-23)

In fact, L.M.'s use of profanity was so egregious and disruptive during her deposition that the court agreed to extend her deposition for six hours and ordered her attorney to caution L.M. against engaging in such further inappropriate behavior:

> But the witness should be warned that the Court will not tolerate any further vulgarities, any further accusations without merit relative to counsel, any further attacks on counsel, any references to counsel's children or anything of that nature.
> . . .
> I will allow the deposition . . . without interruptions of the same type that we witnessed by virtue of my reading of this transcript on several occasions now, to last another six hours, total. Period.

. . .
I want to put on record that the vulgarities, the attacks on counsel, the attacks of a personal nature that were communicated by L.M. were such that, if they are repeated, that sanctions will be assessed, and those sanctions could include the striking of the pleadings.
(see November 3, 2009 Hearing Transcript 9:20-10:23)

In addition to her "vulgar" behavior during her deposition, L.M. admitted during the deposition that L.M. "started drinking, partying and having fun, when I was around 15, I guess. . . .14 going into 15" (see Depo Transcript 304:19-22). She admitted under oath that "I lost my virginity when I was 14 years old." (see Depo Transcript 109:17-18). She also admitted that she did "any drugs I could get, coke, pain killers. I have done many drugs, ecstasy and -- . . . and Xanax." (see Depo Transcript 86:12-15) She testified that she started using drugs when "I was in seventh and eight and ninth. Not when I was in seventh. More when I was in eighth and ninth." (see Depo Transcript 86:22-24) She admitted, however, that Epstein never provided L.M. with any drugs or alcohol:

Q: Jeffrey Epstein never gave you any drugs did he?
A: No.
Q: He was an antidrug person, wasn't he?
A: That's what he said.
Q: And he made that pretty clear to you?
A: Yes.
Q: Never gave you alcohol, right?
A: Never.
Q: Told you he didn't believe in alcohol. Didn't drink it himself, right?
A: True.
Q: Always treated you well when you were at his house, didn't he?
. . .
A: Of course.
(see Depo Transcript 305:5-306:1)

L.M. also testified under oath that she and her friend, E.W., worked as topless dancers at a strip club when L.M. was only fourteen or fifteen years old:

Q: Okay, when you thought [E.W.] was 14, at what club was she dancing?
A: We both went to Club Cabaret.
. . .
A: When we were, when we were 14, we went there like once or twice.
. . .
Q: So, you went in there at age 14 with her? Were you 14 at the time?
A: Yes. She might have been 15. I was maybe just turned 15.

. . .
Q: What did you do [at Club Cabaret]?
A: I was an entertainer.
. . .
Q: And then when you say you were entertainment, what did you do?
A: I was a dancer.
Q: Meaning you got up on stage, right?
A: Yes.
Q: Took your top off, right?
A: Yes.
. . .
Q: Did you do lap dances?
A: Not at this particular club.
Q: You have done them at other clubs?
A: Yes.
(see Depo Transcript 299:2-300:21)

L.M. also testified that she "probably" told Epstein that she worked at that strip club. (see Depo Transcript 300:3-4)

L.M. also admitted that she was a call girl/escort since the age of 15. She testified at her deposition: "Well, I lived life as a prostitute" (see Depo Transcript 156:7), "I am a prostitute when I make money" (see Depo Transcript 156:12-13), and "I was a call girl and I worked for myself. . . . From the age of 15 to the age of 21" (see Depo Transcript 280:16-19). In fact, L.M. admitted to making $1,000 a day or more from prostitution on "maybe" more than 20 occasions in one year alone:

Q: You earlier said that in the year 2008, some days you made a thousand dollars a day, some days you made $2,000 a day. How many days out of the year would you say you made a thousand dollars a day or more a day in the year 2008?
A: I don't know.
. . .
Q: Was it more than ten?
A: Maybe.
Q: Was it more than 20?
A: Maybe.
(see Depo Transcript 157:11-159:6).

L.M. also admitted under oath to keeping a list of amounts she collected from her johns in "two or three" lined books that she kept for the years "06, 07, 08 and 09" (see Depo Transcript 59:13-64:12), including a book of "Psalms" that she obtained from a religious store (see Depo Transcript 152:1-14).

L.M. attempted to lay blame on Epstein during her deposition for, among other things, her life as a prostitute. (see Depo Transcript 129:5-23). Yet L.M. admitted that she never had sexual intercourse with Epstein and never touched Epstein's penis:

Q: You never had sexual intercourse with Mr. Epstein, did you?
A: Penis inserted into the vagina, no.
Q: Did he ever insert his penis into your mouth?
A: No.
Q: Did he ever insert his penis into your anus?
A: No.
Q: Did he ever insert his penis into your vagina?
A: No.
. . .
Q: Did you ever hold his penis in your hand?
A: No.
(see Depo Transcript 71:15-72:9)

Moreover, sworn deposition testimony fro[redacted] the person who first brought L.M. to Epstein's home, indicates that L.M. engaged in prostitution before L.M. ever met Epstein. In her deposition, Ms. Adriano testified that on L.M.'s second visit to Epstein's home, L.M. quoted to Epstein prices for various sexual favors that L.M. and L.M.'s mother performed. Ms. Adriano testified that L.M. was "telling [Epstein] about some stuff that her mom and her did sexually for money or some stuff like that" (see Depo Transcript of C.M.A. 280:9-11) and that L.M. was "offering information" to Epstein:

A: That her and her mom have had, her mom does things and has prices for things. Something of that matter. . .
Q: Sexual nature?
A: Yeah.
(see Depo Transcript of C.M.A. 276:16-277:11)

II. Deposition [redacted].M.A.)

Another woman claiming in her civil case to have lost her innocence to Epstein is[redacted] Yet, Ms. Adriano's sworn deposition testimony in her civil case against Epstein paints quite a different picture. Ms. Adriano, who during her deposition appeared at times disoriented and even once fell asleep, testified under oath to a pervasive history of illegal drug abuse. For example:

Q: You have used a number of illegal drugs in the past, have you not?
A: Yes, I have.
Q: And what drugs have you used in the past?
A: Cocaine, marijuana, pain pills, Morning Glories, Angle Trumpets, acid, Ecstasy.
. . .
Q: Heroin?
A: Yep, I've tried heroin.
. . .
Q: You have tried crystal meth?
A: Yeah. . .
(see Depo Transcript 87:11-88:8).

Ms. Adriano admitted that she began smoking marijuana before she ever met Epstein (see Depo Transcript 274:11-13). In addition, she testified:

Q: And you started using marijuana at age what?
A: Thirteen.
Q: And you used it with what degree of frequency?
A: I don't know, every day.
(see Depo Transcript 274:14-19)

She further admitted that she altered Roxicodone pills to take the drug intravenously because "it wasn't working for me swallowing it anymore" and because "it hits you faster" (see Depo Transcript 97:14-20). She also testified that "I told [Wellington Regional Hospital] I was an IV drug user." (see Depo Transcript 271:20-23).

Like, L.M., Ms. Adriano confirmed under oath that Epstein never gave or even offered her drugs or alcohol:

Q; Mr. Epstein never gave you any drugs, did he?
A: No.
(see Depo Transcript 103:8-10)

Q: He never told you to use drugs in his house, did he?
A: No, he never told me to.
Q: He never gave you alcohol in his house, did he?
A: No.
(see Depo Transcript 106:7-12)

Q: He never attempted to drug you in any manner, did he?
A: No.

Q: Never even offered you drugs, correct?
A: Correct.
(see Depo Transcript 131:13-17)

In addition to her pervasive history of drug abuse, Ms. Adriano also admitted in her deposition that she had a long history of sexual activity since the age of 12, well before she ever met Epstein:

Q: So, by, by your acknowledgement in these answers to interrogatories before you ever went to Mr. Epstein's house the first time, you had had sexual relations with Josh Moles, Danny Andre[redacted]nd somebody whose last name you can't remember, and –
A: And that's it.
Q: And Michael Riccoca?
A: No.
Q: Not Michael Riccoca, but up through[redacted]
A: Yes.
(see Depo Transcript 258:6-16)

Q: Okay. And when was the first time that you had a sexual experience with another woman?
A: When I was 12.
Q: and who was this other woman?
A: My ex-girlfriend.
(see Depo Transcript 161:18-22)

Ms. Adriano and one of her boyfriends even filmed themselves having sexual intercourse when Ms. Adriano was just 13 years old:

Q: . . . When were you filmed in the nude?
A: With one of my boyfriends.
. . .
Q: And when was he your boyfriend?
A: I was 13.
Q: Excuse me?
A: When I was 13.
. . .
Q: Was this before or after the point in time that you had your relationship with Jennifer?
A: It was after. Well, it was before. I don't – It was like during type of thing. Even though she was my girlfriend, we still had boyfriends if that helps you.
. . .

Q: But the film was of the two of you together as supposed [sic] to just you alone?
A: Yes.
Q: And what were you and he doing in the film?
A: Having sex.
Q: Just intercourse?
A: Yeah.
(see Depo Transcript 200:25-202:5)

Ms. Adriano testified that her first child was born "when I was 17." (see Depo Transcript 204:10-11). She testified to having a sexual relationship with the father of that child since she was 13 years old:

Q: When did you first meet Mr. Haught?
A: When I was 13.
Q: Did you, did you meet him before you first went to Mr. Epstein's?
A: Yes.
Q: Had you had a sexual relationship with Mr. Haught, obviously?
A: Yes.
Q: Had you had sex with Mr. Haught before you went to Mr. Epstein's for the first time?
A: Yes.
Q: And what sexual acts had you engaged in with Mr. Haught before you went to Mr. Epstein's?
A: Intercourse.
Q: And did you consider Mr. Haught to be your boyfriend?
A: Yeah.
Q: And you were dating him during the entire period of time that you went to Mr. Epstein's
A: Yeah.
Q: And did Mr. Haught ever physically bring you to Mr. Epstein's house?
A: Yes.
. . .
Q: . . . Ever any occasion when Mr. Haught brought any females that he dropped off at Mr. Epstein's other than –
A: Yes, me and A.L. and me and L.M.
(see Depo Transcript 207:20-209:17)

Ms. Adriano testified about having a frighteningly violent and tumultuous history with this boyfriend. For example:

A: He cheated on me with A.L. and I suppose he felt guilty about it. So, he tried to say I was cheating on him and I wasn't cheating on him. He was

cheating on me and he felt guilty, and then decided he was going to try to kill me.
Q: And you were afraid – where were you when this gun was held to your head?
A: In the middle of a field.
(see Depo Transcript 258:22-259:4)

Q: For approximately how long did the event take place tha[redacted]d a gun to your head?
A: Like five minutes and then we kissed and made up and had sex.
Q: In the field?
A: Yep.
(see Depo Transcript 260:24-261:4)

Q: Was there another occasion th[redacted] was physically violent towards you?
A: Yes.
Q: When was that?
A: When he tried to drown me in a canal.
(see Depo Transcript 261:15-19)

Epstein even counseled Ms. Adriano against continuing her relationship with this violent man, but Ms. Adriano ignored Epstein's advice:

Q: And when did you tell Mr. Epstein about it?
A: On one of the occasions I went to his house.
Q: And what did he say?
A: I don't know. He talked to me about it.
Q: Was he sympathetic toward you?
A: A little bit.
Q: Did he tell you you ought to get away from this guy?
A: Yeah.
Q: Did you pay attention to what he said?
A: Obviously not, if I had a kid with him some years later.
(see Depo Transcript 262:5-17)

Despite Ms. Adriano's established history of drug abuse originating prior to her meeting Epstein and long history of sexual activity with members of both the same and opposite sexes that predated her interactions with Epstein, Ms. Adriano claims injury by Epstein in her civil case. She makes these claims even though she made the following admissions in her deposition:

Q: Did you ever have sexual intercourse with Mr. Epstein?

A: No.
(see Depo Transcript 106:13-15)

Q: Did you ever touch Mr. Epstein's penis –
A: No.
Q: -- in any way?
A: No, no.
(see Depo Transcript 109:1-4)

Q: All right. Would you, would you say that during the period from May '02 to August '03 Mr. Epstein was good to you?
A: Yes.
(see Depo Transcript 127:23-128:1)

Q: Did he ever, did he ever strike you ever, hit you?
A: No.
. . .
Q: Did he ever commit an act of domestic violence against you?
A: No.
(see Depo Transcript 129:2-10)

Q: . . . Did Mr. Epstein ever threaten you in any manner?
A: No.
(see Depo Transcript 131:2-4)

In fact, Ms. Adriano testified that she enjoyed going to Epstein's home:

Q: Did you enjoy the occasions when you went to Mr. Epstein's?
A: Yes. Like enjoyed collecting the money, yes.
Q: Well, you enjoyed what you were doing, didn't you? You enjoyed spending time with him?
A: Not exactly spending time with him. I enjoyed going to be able to collect that much money.
(see Depo Transcript 141:10-16)

Ms. Adriano enjoyed collecting the money so much that she, herself, initiated contact in order to schedule visits to collect that money:

Q: Well, there were also occasions when no one from Mr. Epstein called, but rather you called Mr. Epstein's and asked to go?
A: Yes.
Q: And that was because you wanted to go and earn some money, correct?

A: Yes.
(see Depo Transcript 137:7-13)

Nevertheless, C.M.A. claimed in her deposition that specifically because of her interactions with Epstein:

A: I have a very hard time working around older men or in specific situations.
Q: What situations would those be?
A: I don't trust anybody and I don't feel safe in some places.
Q: Well, you say you don't trust anybody?
A: Well, I don't trust men.
Q: What—any kind of particular kind of men or just –
A: Older men.
Q: And what's your definition of "older"?
A: Above 40.
(See Depo Transcript 66:10-21)

Yet, despite her claimed "trust" issues with men over 40 years old, Ms. Adriano admitted under oath at her deposition that, after she stopped seeing Epstein:

A: I was working for an escort service.
Q: And what was the name of that escort service?
A: Think Pink and Palm Beach Escorts.
Q: That would be two separate escort services?
A: Yes.
(see Depo Transcript 68:12-18)

Q: And thereafter, after you were employed, did you on numerous occasions go out with men over 40 years of age?
A: Yes.
(See Depo Transcript 75:21-24).

Incredulously, Ms. Adriano claimed in her deposition that on the occasions when she went out with people that were over 40 years old, she would only go "to dinner or to go out dancing" or "to a movie or to like an event that they had to go" (see Depo Transcript 83:11-16), that she told the escort services that "I would not do anything sexual with anybody" (see Depo Transcript 75:18-19), and that if somebody tried to do something sexual with her, then "I left" (see Depo Transcript 84:5-10). Though she claimed that nothing sexual happened with her clients, according to her testimony, somehow:

Q: . . . you have made as much as a thousand dollars a night –

A: Yes.
Q: -- going out with people, men that are over 40, have you not?
A: Yes, that's true.
(see Depo Transcript 67:15-20)

and

Q: Is it true that the amount of money that you earned with Think Pink and with Palm Beach escorts was the most you ever earned as a wage in your life?
A: Yeah.
(see Depo Transcript 82:12-16)

III. Deposition o[redacted]V.Z.):

Although V.Z. also claimed in her civil case injury from her interactions with Epstein, her sworn deposition testimony clearly establishes that any injuries that she may have sustained were the result of a dangerous and violent relationship that she carried on with another man during the entire period that she claims to have been interacting with Epstein:

Q: Now, read to the ladies and gentlemen of the jury what you wrote occurred on Setpember 20th, 2004 with Mr. Vinyard.
A: Preston and I were laying in bed. When a guy friend called my cell phone, Preston said that I was a slut, whore, cunt that was cheating on, that I was cheating on him. Preston started checking, checking, I don't even –
Q: Choking?
A: -- yeah, choking me into the mattress, and then when I went into my purse, he threw me against the wall and started yelling at me. Then Preston pushed me out the door. And whenever I asked for the rest of my belongings, he told me to wait.

Whenever he came back, he spilled a bear all over and threw cigarettes it in my face and slammed me into the ground. I got up. I went to my car and he followed me.

. . .

A: Shut my door and he opened it. He spit in my face and he continued to call me a whore, a slut, and cunt. I shut the door, and he opened it again, and he got in my face, grabbed my arms very hard[.] [T]o make him let go[,] I bit his arm. I bit his arm and he bit me back on my finger and cut it open. He was, he was biting so hard that he was repeating – he repeatedly harassed me since last night . . .
Q: Would you treat a dog like this?
A: No.

Q: No human being ought to be treated like this, should they?
A: No.
(see Depo Transcript 357:6-360:4)

V.Z. admitted under oath that V.Z. was engaged in a sexual relationship with this abusive man since the age of 16 (though her admissions during the deposition indicate that it was earlier than that):

Q: Now, it's a fact, is it not, that by the beginning of your junior year, by the beginning of let's say, August of '03, you were having sexual relations with a Preston Vinyard, weren't you?
A: Yeah.
(see Depo Transcript 180:7-11)

Q: Okay. So, Mr. Vinyard had taken his penis and inserted it in your vagina before your junior rear of high school; isn't that right?
A: Yeah, I think so, yeah.
Q: Had you given him oral sex before your –
A: Yeah.
Q: -- junior year of high school?
(see Depo Transcript 181:21-182:2)

Q: Are you – did you – are you claiming you lost your virginity to Preston Vinyard?
A: Yeah.
(see Depo Transcript 183:19-21).

V.Z. testified that when she began this sexual relationship with this abusive man, he was then a 23 year-old adult, 7 years older than she, had been in prison and was an alcoholic:

Q: When was the first time you went over to his house?
A: When I was 16.
Q: Sixteen. Okay. He's 23 and your 16 when you first started dating him, right?
A: Yes, somewhere in that time – I'm pretty sure it's somewhere in that time frame.
(see Depo Transcript 198:3-11)

A: Well, when I first started dating him, he [my father] didn't really know that – how old Preston was. He didn't know that he had a criminal background until later on –
(see Depo Transcript 199:17-21)

A: There was a time, where he, he would drink a lot. He was an alcoholic and he would get out of control when he drank. . .
(see Depo Transcript 28:11-29:23)

Because of Mr. Vinyard's severe violence and abuse against her, V.Z. obtained a restraining order against him during her junior or senior year of high school:

Q: Did you say you got a restraining order against him?
A: Yeah.
. . .
Q: And what year of high school were you in when you got the restraining order against the first love of your life, Mr. Vinyard, who you now say is abusive to you?
. . .
A: I think it was my junior or senior year.
(see Depo Transcript 202:10-22)

Nevertheless, both before and after she obtained this restraining order, V.Z. continued to maintain a sordid and damaging sexual relationship with Mr. Vinyard. For example, V.Z. admitted under oath that she made a homemade video of her sexual exploits with Mr. Vinyard from her bedroom in her parents' house using her parents video equipment while V.Z. was in high school:

A: I have made a homemade video before.
. . .
Q: . . . what did this homemade video depict?
A: Me and my boyfriend.
Q: At the beach or –
A: -- making out together.
Q: -- having sex?
A: Yeah.
Q: Having sexual intercourse?
A: Yeah.
(see Depo Transcript 226:11-227:7)

Q: When you made the videotape of you and Preston having sexual relations, what acts were recorded on the videotape?
A: On the tape?
Q: Yeah, the tape –
A: Sex.
. . .
Q: You used your parents' video camera –

A: Yeah.
Q: -- to record you and this fellow, Preston Vinyard, engaged in sexual relations?
A: Yeah.
Q: Where did the actual filming take place?
A: In my, my house.
Q: What house?
A: My room.
Q: The room, the house your parents owned?
A: Yeah.
. . .
Q: Tell the ladies and gentlemen, look in the camera and tell the ladies and gentlemen of the jury you don't know if you were in high school when you made this tape.
. . .
A: I was in high school when I made this with Preston.
. . .
Q: So, tell me what specific acts you engaged in with Mr. Vinyard that you then recorded on this video, to your parents' videotape machine in your parents' home.
. . .
A: Of us having sex.
Q: I want to know the specific acts. Did it reflect oral sex?
A: Sure.
Q: Were you, did it reflect you having Preston Vinyard's penis in your mouth?
A: Yeah.
. . .
Q: Did it – show him licking your vagina?
A: Yeah.
. . .
Q: Did it – did he insert his penis in your vagina on this tape?
A: Yeah.
(see Depo Transcript 361:20-368:8)

V.Z. also testified that she caught herpes from Mr. Vinyard when she was 15 or 16 years old:

Q: Where did you get the herpes from?
A: The one person I was sleeping with.
Q: Well, who is that?
A: Preston.
. . .

Q: Do you remember when you got the herpes?
A: Yeah.
Q: Still in high school at the time?
A: Yeah.
(see Depo Transcript 324:24-325:10)

Q: How old were you at that time?
A: No, I don't remember?
Q: Fifteen?
A: I don't remember.
Q: Well that was before you got pregnant, right?
A: Yeah could have been like when I was 16.
Q: Okay. So 15 or 16?
. . .
A: One of those two.
(see Depo Transcript 326:23-327:9)

V.Z. admitted to having three abortions when she was with Preston Vinyard, two of which occurred while she was in high school and two of which occurred after she obtained the restraining order against Mr. Vinyard:

Q: How many abortions have you had?
. . .
A: Three.
(see Depo Transcript 299:16-21)

Q: All right. When did you have your first abortion?
A: Sixteen.
Q: Which would have been – what year was that?
. . .
A: It might have been my sophomore or junior year. I don't remember.
Q: Sophomore or junior year in high school?
A: Yeah.
(see Depo Transcript 311:7-21)

Q: When was your second abortion?
A: In my senior year in high school.
Q: That was when you were 17?
A: Yes.
(see Depo Transcript 312:23-313:1)

Q: So, after you got an injunction against domestic violence, you hooked up with Preston Vinyard again and got pregnant with him again, and had

another abortion with him; is that right?

. . .

Q: Is that right?

A: Yeah.

(see Depo Transcript 426:9-16)

V.Z. admitted that she began drinking alcohol before she was even 16 years old and that during her relationship with Preston Vinyard, she was drunk with him twice a week:

Q: And do you recall when you first started drinking?

A: No. I don't remember the first time I started drinking, but – no, I don't.

Q: Was it before you were 16?

A: Maybe, yeah.

Q: And how many times were you drunk with old Preston?

A: I don't even know that answer. I don't know.

Q: Well, Preston testified yesterday that you were drunk about twice a week with him. Would you agree with that estimate from him?

. . .

A: Yeah, probably.

(see Depo Transcript 213:11-25)

V.Z. was even arrested for DUI when she was 17 years old:

Q: Okay. And it was – it was when you were 17, between the ages of 17 and 18?

A: Uh-huh.

. . .

Q: And what were you arrested for?

A: DUI

(see Depo Transcript 25:17-26:1)

V.Z. also admitted that before and during the course of her relationship with Mr. Vinyard, V.Z. used illegal drugs, including marijuana, cocaine and ecstasy:

Q: You had smoked pot before you met Mr. Epstein, had you not?

A: Yeah.

(see Depo Transcript 221:3-5)

Q: I want to ask you again, did you ever do any drug with Mr. Vinyard that you didn't have any prescription for?

A: Yeah.

Q: What drugs?

A: Coke.

(see Depo Transcript 214:24-215:4)

Q: Any pills that you have taken before that you didn't have a prescription for?
A: Yeah, I have tried ecstasy.
(see Depo Transcript 217:4-6)

Q: For what period of time did you take ecstasy?
A: I didn't. It's not like I took it every day. It's not like I took it every day. On occasion, I tried it.
(see Depo Transcript 217:19-23)

V.Z. has attempted to blame Epstein for any injuries she claims to have sustained during the period that she was engaged in this unfortunate and abusive relationship with Preston Vinyard. This is so even though V.Z. admitted in her deposition that she was specifically told b[redacted]Don't tell [Epstein] your age" (see Depo Transcript 62:17-22). Moreover, V.Z. testified:

Q: Didn't have any sexual relations with Mr. Epstein did you?
A: No.
(see Depo Transcript 180:12-14)

Q: And by the way, did you – did you ever touch Mr. Epstein's penis?
A: No.
(see Depo Transcript 361:5-7)

Q: Did he ever physically hurt you in any manner whatsoever?
A: No.
Q: Did he ever demean you in any manner whatsoever?
. . .
A: No.
(see Depo Transcript 169:16-25)

Q: Mr. Epstein never gave you drugs, correct?
A: No.
(see Depo Transcript 221:12-14)

And V.Z. admitted during her deposition:

Q: Was Mr. Epstein good to you?
A: Yeah.
(see Depo Transcript 122:9-10)

Q: And Mr. Epstein, as you said before lunch, was very nice towards you, was he not?
A: Yeah.
. . .
A: He was really nice, like friendly.
(see Depo Transcript 168:9-20)

In fact, V.Z. admitted that from the period of time after she was of legal age and legally deemed able to make her own decisions regarding her interactions with Epstein, she voluntarily saw Epstein as much as 50 times:

Q: Can you tell me how many times you went to Mr. Epstein's between June 1st of 2005 and Octoer 31st of 2005?
. . .
A: Well, approximately, approximately like 30 to 50 times.
. . .
Q: Okay. You went voluntarily. Nobody forced you to go to Mr. Epstein's, correct?
. . .
A: Yeah.
(see Depo Transcript 77:17-79:4)

Moreover, V.Z. admitted under oath that when V.Z. first learned of the claims against Epstein and before she filed her law suit against Epstein, V.Z. "was like defending Mr. Epstein" (see Depo Transcript 276:2), and that V.Z. and her friend, [redacted] [redacted]cussed and told others that such claims were outrageous:

Q: Did you ever, at any point in your life right up until today tell anyone that you thought it was outrageous that anyone would file a lawsuit against Jeffrey Epstein because everybody knew what the deal was and knew what they were doing or words to that effect?
. . .
A: Yeah, I said that to Lauren, because I didn't even think I was doing anything wrong at the time. . .
. . .
A: We, she said we both said to each other. We were just, like, I can't believe this is happening, like Jeffrey is such a great guy, like, you know, like, saying all this stuff about, about him. . .
(see Depo Transcript 275:18-277:2)

Q: All right. Now, isn't it a fact that you have made this statement to people other than [redacted] between January of '06 and January of '09, that everybody that went to see Jeffrey Epstein knew exactly what they were

getting into, did it voluntarily, and it's outrageous that they would sue him?
. . .
A: Yeah.
. . .
Q: Now, I want to tell you that you filed your lawsuit in 2008. Okay. You can assume and I'm sure your counsel will correct me if I'm wrong, but you didn't file this lawsuit until 2008. You had a lot of conversations with your friends that had gone to Jeffrey Epstein before you filed this lawsuit, didn't you?
. . .
A: Yeah.
Q: And all those conversations were that everybody knew what they were getting into, and it was all done voluntarily, and at that time you-all thought it was crazy that anybody would sue Jeffrey Epstein, didn't you?
. . .
A: Yeah.
(see Depo Transcript 282:8-25)

Finally, V.Z. also admitted that even after the police contacted her when she was in college and of legal age, but before she had retained legal counsel in her civil case, she "probably more than likely" would have continued to see Epstein. See Depo Transcript 393:10-16.

V.Z.'s claims against Epstein defy credibility. She was consistently evasive during her deposition. She admitted in her deposition to lying under oath and to lying in evaluation interviews with her own experts, including about such things as her drug usage (see Depo Transcript 402:22-403:2) and her three aborted pregnancies (see Depo Transcript 405:2-406:9). Most tellingly, V.Z. admitted:

Q: So, we don't really know, even when you're under oath, whether you're telling the truth or you're lying, do we?
A: No.
(see Deposition Transcript 401:7-10)

In light of her admitted violent and sordid history with Mr. Vinyard during the entire period that she claims to have been interacting with Epstein, her evasive responses to direct deposition questions, her admitted deceptions to her own experts, her revelation that her testimony cannot be relied upon, even under oath, her admissions regarding her positive personal feelings about Mr. Epstein and her pre-litigation characterization of the civil claims against Epstein as outrageous, V.Z.'s civil claims of injury by Epstein do not withstand scrutiny.