

COMPOSITE  
EXHIBIT 2  
(FILE UNDER SEAL)

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IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL  
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO:502008CA028051XXXXMB AB

L.M.

Plaintiff,

-vs-

JEFFREY EPSTEIN  
AND SARAH KELLEN,

Defendants.

/

DEPOSITION OF JANUSZ BANASIAK

Tuesday, February 16, 2010  
10:09 - 2:30 p.m.

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

Reported By:  
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1 Q. Is your computer in your office --

2 A. Yes.

3 Q. Let me finish. Is the computer in your  
4 office linked up with the three computers that were  
5 removed from the house? Meaning, can you look at  
6 the system and see what is on those three computers?

7 A. No, no.

8 Q. Is it your understanding that those three  
9 computers are linked with one another or do you  
10 know?

11 A. I don't know, but I, I doubt it. They are  
12 separate I guess.

13 Q. Okay. Were you aware that Mr. Epstein  
14 used a Citrix program to link various computers?  
15 Did you know that?

16 A. Yeah. I use Citrix too in my computer for  
17 exchanging e-mails and get through Internet.

18 Q. Okay. So, is it your understanding that  
19 the only connection then through Citrix with these  
20 computers, these various computers that were in  
21 Mr. Epstein's home, was for e-mail purposes?

22 A. Yes.

23 Q. Okay. To your knowledge, you're not  
24 familiar with those computers sharing other files or  
25 information?

1 A. No.

2 Q. That's not something that you were, you  
3 were privy to? You weren't, you weren't in the loop  
4 of the sharing of information in the house in terms  
5 of the computers being connected through any server?

6 A. I don't really know what, how, how to answer  
7 your question because Citrix is for the whole  
8 organization to exchange e-mail between employees.

9 Q. All right. You used the term?

10 A. So, even my computer is connected to Citrix.  
11 I can receive mail and I can e-mail information to  
12 employee within organization. But I don't know if you  
13 can see to each computer what is going on on another  
14 computer.

15 Q. You don't know about --

16 A. Is that your question?

17 Q. You don't know about shared files?

18 A. No.

19 Q. You only know that the one computer can  
20 e-mail the other?

21 A. Right.

22 Q. But that can happen with any two computers  
23 in the world pretty much. You can send e-mails to  
24 each other, right.

25 A. Yes.

1                   Q. You have used the term organization, you  
2 can share within the organization. What do you --  
3 just so I can understand what you're calling the  
4 organization, what do you mean by that word?

5                   A. People employed by Jeffrey Epstein. There are  
6 a few groups of people, his office in New York and I  
7 guess --

8                   Q. Who are those people by name that you  
9 would consider within the Jeffrey Epstein  
10 organization?

11                  A. His accountant, his --

12                  Q. Who is that?

13                  A. Bella Klen.

14                  Q. What is it?

15                  A. Bella Klen. K-l-i-n. E-n, I'm sorry.

16                  Q. Bella, B-e-l-l-a?

17                  A. Yes.

18                  Q. Is that somebody in New York?

19                  A. Yes.

20                  Q. Is that a male or female?

21                  A. Female.

22                  Q. And you understand that's his accountant?

23                  A. Right.

24                  MR. GOLDBERGER: Just to get the spelling  
25 correct is it K-l-e-i-n?

1                   THE WITNESS: I don't know.

2                   BY MR. EDWARDS:

3                   Q. We'll go back to that but I tell you why I  
4                   ask. If you don't know then you don't know, but in  
5                   the course of Mr. Epstein's -- you're aware that he  
6                   did plead guilty to a couple felonies in state  
7                   court, right?

8                   A. Right.

9                   Q. Well, in the course of the negotiation  
10                  with the federal government and the U.S. Attorney's  
11                  Office, they, the agreement between Mr. Epstein and  
12                  the U.S. Attorney's office mentions people that are  
13                  called co-conspirators of Epstein. And Leslie Groff  
14                  is named as one of those co-conspirators.

15                  Do you know what involvement, if any, that  
16                  she had with the crimes that were being  
17                  investigated?

18                  A. No.

19                  Q. Okay.

20                  A. I am not aware of this.

21                  Q. Okay. The other people mentioned as  
22                  co-conspirators are Sarah Kellen, Adriana Ross, and  
23                  Nadia Marcinkova. So we'll get to them in a minute  
24                  but first just so we stay on the track of who was in  
25                  the organization, is Sarah Kellen, Adriana Ross and

1 Nadia Marcinkova all people that you would also  
2 consider within the organization?

3 A. Yes.

4 Q. Okay. So, we just added three more names  
5 to it. Who else would you consider, Ghislaine  
6 Maxwell?

7 A. Yes.

8 Q. And who else?

9 A. Who was working there?

10 Q. Bella, Richard Kahn, Leslie Groff,  
11 Ghislaine Maxwell, Nadia, Sarah, Adriana.

12 A. I think Harry was involved with the  
13 accounting.

14 Q. Okay.

15 A. I don't recall his last name.

16 Q. Somebody else involved with the  
17 accounting?

18 A. Yes.

19 Q. Okay. Any of those people that you just  
20 named, were any of those people that you just named  
21 the person that you described as the gentleman that  
22 assisted Adriana in removing the computers from the  
23 house prior to the search warrant being executed?

24 A. No. You mean the one who show up to do those  
25 computers?