

EXHIBIT 15
(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendants.

Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,
08-80994, 08-80811, 08-80893, 09-80469,
09-8-591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF NADIA MARCINKOVA
TAKEN ON BEHALF OF THE PLAINTIFF

DATE: April 13, 2010

U.S. Legal Support
(561) 835-0220

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1 to his house to sexually molest; is that right?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q The first time she went to Jeffrey

5 Epstein's house was in 2002 when she was only 14

6 years old; is that true?

7 MR. YAREMA: Object to the form.

8 A Fifth.

9 Q In fact in 2002 you were only 18 years

10 old or so yourself; is that right?

11 A Fifth.

12 Q And E.W. is somebody you observed at

13 Jeffrey Epstein's house on more than 100

14 occasions between 2002 and 2005, a time period

15 between 14 and 17 years of age for her; is that

16 right?

17 MR. YAREMA: Object to the form.

18 A Fifth.

19 Q And each time E.W. was summoned to

20 Jeffrey Epstein's house, it was for the purposes

21 of Jeffrey Epstein sexually molesting her,

22 correct?

23 MR. YAREMA: Object to the form.

24 A Fifth.

25 Q If it was not Jeffrey Epstein personally

27

1 calling E.W., you observed Sarah Kellen to call

2 E.W. for the purposes of her coming over and

3 pleasing Jeffrey Epstein sexually, correct?

4 MR. YAREMA: Object to the form.

5 A Fifth.

6 Q And do you remember the instance where

7 Jeffrey Epstein instructed you to lay down naked

8 and engage in a threesome with E.W. and Jeffrey

9 Epstein?

10 MR. YAREMA: Object to the form.

11 A Fifth.

12 Q Do you remember that that during that

13 threesome, Jeffrey Epstein demanded E.W. to

14 straddle you and otherwise engage sexually with

15 you while Jeffrey Epstein was using vibrators

16 and/or dildos on you?

17 MR. YAREMA: Object to the form.

18 A Fifth.

19 Q In addition to your sexual interactions

20 with E.W., isn't it true that you have used

21 strap-on dildos and vibrators on other underage

22 minors at Jeffrey Epstein's direction?

23 MR. YAREMA: Object to the form.

24 A Fifth.

25 Q You have given oral sex to underage

28

1 minor females?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q You have received oral sex from underage

5 minor females?

6 MR. YAREMA: Object to the form.

7 A Fifth.

8 Q All of these sexual acts with minor

9 females involving you happened in the presence of

10 Jeffrey Epstein?

11 MR. YAREMA: Object to the form.

12 A Fifth.

13 Q During your interaction with underage

14 minor females in a sexual manner, isn't it true

15 that Jeffrey Epstein would participate in the

16 sexual acts and the act would be over upon

17 Jeffrey Epstein ejaculating, correct?

18 MR. YAREMA: Object to the form.

19 A Fifth.

20 Q Did Jeffrey Epstein tell you, that when

21 E.W. was an underage minor female, he forced her

22 to give him oral sex?

23 MR. YAREMA: Object to the form.

24 A Fifth.

25 Q Do you remember E.W. coming over, a

29

1 young girl, with braces on, and going up into

2 Jeffrey Epstein's bedroom on numerous occasions

3 to be sexually molested?

4 MR. YAREMA: Object to the form.

5 A Fifth.

6 Q Do you know when it was that Jeffrey

7 Epstein developed his plan or scheme to gain

8 access to hundreds of underage minor females for

9 the purposes of his sexual gratification?

10 MR. YAREMA: Object to the form.

11 A Fifth.

12 Q Were you a part of the planning of that

13 scheme of Jeffrey Epstein's to gain access to

14 underage minor females?

15 MR. YAREMA: Object to the form.

16 A Fifth.

17 Q Do you know Ghislaine Maxwell?

18 A Fifth.

19 Q Is that somebody who helped Jeffrey

20 Epstein to devise the scheme to allow him access

21 to various and a variety of underage minor

22 females?

23 MR. YAREMA: Object to the form.

24 A Fifth.

25 Q Is Sarah Kellen somebody that was also

30

1 involved in the planning of this scheme to gain
 2 access to underage minor females?
 3 MR. YAREMA: Object to the form.
 4 A Fifth.
 5 Q When is the first time that you observed
 6 Jeffrey Epstein's method of enticing or inducing
 7 underage minor females into sexual acts with him
 8 inside his bedroom?
 9 MR. YAREMA: Object to the form.
 10 A Fifth.
 11 Q Isn't it true that after an underage
 12 minor female was brought to Jeffrey Epstein's
 13 house, typically Sarah Kellen, or Adriana or
 14 yourself would lead that underage minor female to
 15 Jeffrey Epstein's bedroom and leave them alone in
 16 the room; is that true?
 17 MR. YAREMA: Object to the form.
 18 A Fifth.
 19 Q Then Jeffrey Epstein would appear either
 20 naked or wearing a towel; is that true?
 21 MR. YAREMA: Object to the form.
 22 A Fifth.
 23 Q This is his habit or method of
 24 operation, every single time, and that's
 25 something that he has told you about his sexual

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1 interaction with underage minors; is that true?
 2 MR. YAREMA: Object to the form.
 3 A Fifth.
 4 Q And he would direct or demand or
 5 instruct the underage minor female to remove her
 6 clothing; is that true?
 7 MR. YAREMA: Object to the form.
 8 A Fifth.
 9 Q Then he would perform one or more lewd
 10 or lascivious or sexual acts on the underage
 11 minor female. Is that true?
 12 MR. YAREMA: Object to the form.
 13 A Fifth.
 14 Q And you have observed Jeffrey Epstein
 15 engage in sexual interaction with underage minor
 16 females on hundreds and hundreds of occasions,
 17 correct?
 18 MR. YAREMA: Object to the form.
 19 A Fifth.
 20 Q And you have observed Jeffrey Epstein
 21 using vibrators and sexual toys on underage
 22 minors, true?
 23 MR. YAREMA: Object to the form.
 24 A Fifth.
 25 Q In fact, he has also used vibrators and

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1 sex toys on you, correct?
 2 A Fifth.
 3 Q And he has instructed you to use sex
 4 toys and vibrators on other underage minor
 5 females, correct?
 6 MR. YAREMA: Object to the form.
 7 A Fifth.
 8 Q You have observed Jeffrey Epstein
 9 digitally penetrate the vagina of underage minor
 10 females, including E.W., correct?
 11 MR. YAREMA: Object to the form.
 12 A Fifth.
 13 Q As part of his plan to avoid detection
 14 by law enforcement, you have observed Jeffrey
 15 Epstein to pay these underage minor females to be
 16 quiet, correct?
 17 MR. YAREMA: Object to the form.
 18 A Fifth.
 19 Q And this is something that he has told
 20 you he does, for the purposes of grooming these
 21 underage minor females, and avoiding law
 22 enforcement detection, correct?
 23 MR. YAREMA: Object to the form.
 24 A Fifth.
 25 Q Jeffrey Epstein has talked to you about

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1 the psychology of brainwashing or grooming
 2 underage minor females to perform for him
 3 sexually, hasn't he?
 4 MR. YAREMA: Object to the form.
 5 A Fifth.
 6 Q And Sarah Kellen has also spoken with
 7 you about the methodology behind gaining access
 8 to and grooming underage minor females for sex?
 9 MR. YAREMA: Object to the form.
 10 A Fifth.
 11 Q Isn't it true that Ghislaine Maxwell and
 12 yourself and Sarah Kellen had access to a master
 13 list of underage minor females names and phone
 14 numbers so that they could be called?
 15 MR. GOLDBERGER: Time out. Are you
 16 talking to me, counsel?
 17 MR. HOROWITZ: Nodding my head, back at
 18 you. You were nodding at me.
 19 MR. GOLDBERGER: I wasn't nodding at
 20 you. I'm not talking to you, I'm not
 21 communicating with you. I don't know what
 22 you think we are doing here. You said "It
 23 is true," and I have no idea what you are
 24 talking about. Don't interrupt the
 25 deposition, okay?

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1 MR. HOROWITZ: I think you interrupted.
 2 MR. GOLDBERGER: I didn't do a thing --
 3 MR. EDWARDS: I don't know what's
 4 happened here. It has deteriorated here for
 5 no reason whatsoever and has nothing to do
 6 with me or the witness.
 7 MR. GOLDBERGER: You're 100 percent
 8 correct.
 9 MR. EDWARDS: Can we go back to it.
 10 MR. GOLDBERGER: Absolutely.
 11 MR. EDWARDS: Perfect.
 12 The silent fight disrupted me. I lost
 13 where I am now.
 14 MR. GOLDBERGER: Sorry.
 15 MR. EDWARDS: Can you read it back.
 16 THE COURT REPORTER: Certainly.
 17 (The record was read.)
 18 MR. EDWARDS: I'll rephrase the
 19 question.
 20 Q Isn't it true that yourself, Ghislaine
 21 Maxwell and Sarah Kellen had access to a master
 22 of list of underage minor females names and phone
 23 numbers so they could be called for the purpose
 24 of coming to Jeffrey Epstein's house to be
 25 sexually molested?

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1 MR. YAREMA: Object to the form.
 2 A Fifth.
 3 Q How many underage minor females are on
 4 that master list?
 5 MR. YAREMA: Object to the form.
 6 A Fifth.
 7 Q Are there photographs of these underage
 8 minor females on that master list?
 9 MR. YAREMA: Object to the form.
 10 A Fifth.
 11 Q Is that master list saved on a computer
 12 system, as has been testified to in the past?
 13 MR. YAREMA: Object to the form.
 14 A Fifth.
 15 Q Has Jeffrey Epstein talked to you about
 16 the success of his scheme to procure underage
 17 minor females?
 18 MR. YAREMA: Object to the form.
 19 A Fifth.
 20 Q By that, I mean, the method where he
 21 molests an underage minor female, then offers
 22 them additional money if they will bring him
 23 other underage minor females to molest; are you
 24 familiar with that system?
 25 MR. YAREMA: Object to the form.

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1 A Fifth.
 2 Q In addition to that system, isn't it
 3 true that Jeffrey Epstein traffics underage minor
 4 females through a modeling agency?
 5 MR. YAREMA: Object to the form.
 6 A Fifth.
 7 Q Is a modeling agency that he is involved
 8 in with Jean Luc Brunel; you know who that is
 9 right?
 10 MR. YAREMA: Object to the form.
 11 A Fifth.
 12 Q Are you familiar with MC-2 or MC-Squared
 13 Modeling Agency?
 14 A Fifth.
 15 Q You know Jean Luc Brunel, right?
 16 MR. YAREMA: Object to the form.
 17 A Fifth.
 18 Q Is Jean Luc Brunel somebody that you
 19 have been made to perform on sexually?
 20 MR. YAREMA: Object to the form.
 21 A Fifth.
 22 Q Jean Luc Brunel is somebody that you
 23 know to also be a child molester, true?
 24 MR. YAREMA: Object to the form.
 25 A Fifth.

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1 Q This is somebody who for years the
 2 public has known of Jean Luc Brunel as a child
 3 molester, true?
 4 MR. YAREMA: Object to the form.
 5 A Fifth.
 6 Q In fact, that is the only thing Jeffrey
 7 Epstein and Jean Luc Brunel have in common, is
 8 their obsession for underage minor females,
 9 correct?
 10 MR. YAREMA: Object to the form.
 11 A Fifth.
 12 Q And the modeling agency is but one other
 13 mechanism used by Jeffrey Epstein to gain access
 14 to underage minor females for sex, true?
 15 MR. YAREMA: Object to the form.
 16 A Fifth.
 17 Q I read you the statute earlier on Lewd
 18 and Lascivious Molestation, Chapter 800.04, and
 19 that's something that you have witnessed Jeffrey
 20 Epstein violate on hundreds of occasions,
 21 correct?
 22 MR. YAREMA: Object to the form.
 23 A Fifth.
 24 Q And something that you have witnessed
 25 Jeffrey Epstein specifically violate, against

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1 A Fifth.

2 Q That particular message indicates it is

3 from Nadia. You're the only "Nadia" in the

4 house; is that correct?

5 MR. YAREMA: Object to the form.

6 A Fifth.

7 Q This is a call from you indicating that

8 [REDACTED] cannot work today and [REDACTED] will be

9 here at 4:00 p.m.;" is that right?

10 MR. YAREMA: Object to the form?

11 A Fifth.

12 Q Who is [REDACTED]?

13 A Fifth.

14 MR. YAREMA: Object to the form.

15 Q That's an underage minor female that was

16 scheduled to be molested at Jeffrey Epstein's

17 house?

18 MR. YAREMA: Object to the form.

19 A Fifth.

20 Q You scheduled that act of molestation;

21 is that right?

22 MR. YAREMA: Object to the form.

23 A Fifth.

24 Q And [REDACTED] will be at the house at 4:00

25 p.m. [REDACTED] is another underage minor female;

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1 is that correct?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q That's somebody else that you were

5 scheduling to come to his house at 4:00 p.m. for

6 Jeffrey Epstein to engage in sexual acts with

7 her, while she was an underage minor, true?

8 MR. YAREMA: Object to the form.

9 A Fifth.

10 Q Do you know Les Wexner?

11 A Fifth.

12 Q That's somebody that you know owns and

13 operates the Victoria's Secret, the Limited?

14 MR. YAREMA: Object to the form.

15 A Is that a question?

16 Q Is that somebody that you know to own

17 Victoria's Secret or operate Victoria's Secret?

18 A Fifth.

19 Q Do you know if Jeffrey Epstein still

20 talks with Leslie Wexner?

21 MR. YAREMA: Object to the form.

22 A Fifth.

23 Q Do you know Jane Doe-102?

24 A Fifth.

25 Q Are you aware of Jeffrey Epstein and

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1 Ghislaine Maxwell's sexual interaction with Jane

2 Doe-102 when she was a minor?

3 MR. YAREMA: Object to the form.

4 Q This is one of many underage minor

5 females that was trafficked basically around the

6 globe to be sexually exploited and abused; is

7 that correct?

8 MR. YAREMA: Object to the form.

9 A Fifth.

10 Q Was that typical of Jeffrey Epstein and

11 Ghislaine Maxwell to sexually abuse minors on

12 Jeffrey Epstein's airplane?

13 MR. YAREMA: Object to the form.

14 A Fifth.

15 Q And also typical of Ghislaine Maxwell

16 and Jeffrey Epstein to prostitute or pimp out

17 underage minors to friends?

18 MR. YAREMA: Object to the form.

19 A Fifth.

20 Q By "friends," I am talking specifically

21 about people of royalty, politicians,

22 academicians, businessmen and other professional

23 or personal acquaintances?

24 MR. YAREMA: Object to the form.

25 A Fifth.

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1 Q Were you with Jeffrey Epstein on his

2 birthday when one of his friends sent to him

3 12 -- sorry, three 12-year olds for the purposes

4 of Jeffrey Epstein sexually abusing them?

5 MR. YAREMA: Object to the form.

6 A Fifth.

7 Q How many occasions have you observed

8 Jeffrey Epstein to receive as gifts from friends,

9 underage minor females for the purposes of him

10 sexually abusing them?

11 MR. YAREMA: Object to the form.

12 A Fifth.

13 Q These three 12-year olds were from

14 France. Were they sent to him on his birthday by

15 Jean Luc Brunel or by somebody else?

16 MR. YAREMA: Object to the form.

17 A Fifth.

18 Q Have you ever been made to engage in sex

19 with 12-year olds?

20 MR. YAREMA: Object to the form.

21 A Fifth.

22 Q Is it true that Jeffrey Epstein makes

23 you dress up as a 12-year old?

24 MR. YAREMA: Object to the form.

25 A Fifth.

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1 Alan Dershowitz, meaning he continued to sexually
 2 abuse minors despite Alan Dershowitz being a
 3 guest in the house?
 4 MR. YAREMA: Object to the form.
 5 A Fifth.
 6 Q Alan Dershowitz never engaged in any
 7 sexual activity with these underage minors; isn't
 8 that true?
 9 MR. YAREMA: Object to the form.
 10 A Fifth.
 11 Q Have you been made to have sex with
 12 Ghislaine Maxwell?
 13 MR. YAREMA: Object to the form.
 14 A Fifth.
 15 Q Do you know [REDACTED]?
 16 A Fifth.
 17 Q Similar to you being Jeffrey Epstein's
 18 sex slave, is [REDACTED], or was [REDACTED]
 19 Ghislaine Maxwell's sex slave?
 20 MR. YAREMA: Object to the form.
 21 A Fifth.
 22 Q Ghislaine Maxwell is somebody who you
 23 know to be bi-sexual, true?
 24 MR. YAREMA: Object to the form.
 25 A Fifth.

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1 Q You know that Ghislaine Maxwell engaged
 2 in sexual acts with underage minor females, true?
 3 MR. YAREMA: Object to the form.
 4 A Fifth.
 5 Q This is yet another friend of Jeffrey
 6 Epstein's that is into the act of molesting
 7 underage minor females, right?
 8 MR. YAREMA: Object to the form.
 9 A Fifth.
 10 Q Now, you are the next participant in
 11 that activity, meaning you have been groomed to
 12 enjoy and appreciate the acts of sex with
 13 underage minors, true?
 14 MR. YAREMA: Object to the form.
 15 A Fifth.
 16 Q Has Jeffrey Epstein instructed you to
 17 lie to his Probation Officer in any way?
 18 MR. YAREMA: Object to the form.
 19 A Fifth.
 20 Q Mr. Visoski testified that you took a
 21 helicopter flight within the last year with
 22 Jeffrey Epstein to Miami. Do you remember that
 23 flight?
 24 MR. YAREMA: Object to the form.
 25 A Fifth.

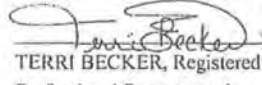
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1 Q What was the purpose of that flight?
 2 MR. YAREMA: Object to the form.
 3 A Fifth.
 4 Q Did you sign a confidentiality agreement
 5 with Jeffrey Epstein?
 6 MR. YAREMA: Object to the form.
 7 A Fifth.
 8 Q When is the last time that you observed
 9 Jeffrey Epstein have sex with a minor?
 10 MR. YAREMA: Object to the form.
 11 A Fifth.
 12 Q Since being on probation, has Jeffrey
 13 Epstein been able to, or has he flown to his
 14 island?
 15 MR. YAREMA: Object to the form.
 16 A Fifth.
 17 Q To your knowledge, has Jeffrey Epstein
 18 flown to New York while on probation or community
 19 control?
 20 MR. YAREMA: Object to the form.
 21 A Fifth.
 22 Q Isn't it true that he has flown both to
 23 New York and to his island, and you have
 24 accompanied him on those trips, since he was on
 25 community control?

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1 MR. YAREMA: Object to the form.
 2 A Fifth.
 3 Q Isn't it also true that Jeffrey Epstein
 4 has indicated to you that he will always engage
 5 in sex acts with underage minor females?
 6 MR. YAREMA: Object to the form.
 7 A Fifth.
 8 Q In fact, that's something that he has
 9 told you, that he believes he is entitled to do;
 10 isn't that right?
 11 MR. YAREMA: Object to the form.
 12 A Fifth.
 13 Q Isn't it true that Jeffrey Epstein
 14 believes and has told you that if he doesn't
 15 physically force the underage minor female into
 16 any act, then he is entitled to engage in sex
 17 with any underage minor female despite the age?
 18 MR. YAREMA: Object to the form.
 19 A Fifth.
 20 Q What is the youngest female you have
 21 witnessed or observed Jeffrey Epstein to engage
 22 in sex with?
 23 MR. YAREMA: Object to the form.
 24 A Fifth.
 25 Q Do you have a bank account at Chase Bank

1 A Fifth.
 2 Q Did you know that Jeffrey Epstein gave
 3 A.D. a digital camera?
 4 MR. YAREMA: Object to the form.
 5 A Fifth.
 6 MS. EZELL: I don't have any other
 7 questions. Thank you.
 8 MR. GOLDBERGER: You still have your
 9 microphone on. You must have something on
 10 your mind, Brad.
 11 REDIRECT EXAMINATION
 12 BY MR. EDWARDS:
 13 Q Ms. Marcinkova, through the whole day
 14 you've taken the Fifth on just about every single
 15 question. Is there any reason why we should not
 16 presume that the answer to these questions would
 17 incriminate you?
 18 MR. YAREMA: Object to the form.
 19 A The Fifth.
 20 Q The reason that you have taken the Fifth
 21 is because the questions you have been asked
 22 would have been answered in the affirmative and
 23 you're afraid of prosecution for your
 24 involvement, true?
 25 MR. GOLDBERGER: Don't answer that

1 THE STATE OF FLORIDA)
 2 COUNTY OF PALM BEACH)
 3 I, TERRI BECKER, a Registered
 4 Professional Reporter and Notary Public for the
 5 State of Florida at Large, do hereby certify that
 6 I reported the videotaped deposition of NADIA
 7 MARCINKOVA, the WITNESS, called by the PLAINTIFF
 8 in the above-entitled action; that the witness
 9 was duly sworn by me; that the foregoing pages,
 10 numbered from 1 to 104, inclusive, constitute a
 11 true record of the deposition by said witness.
 12 I further certify that I am not attorney
 13 or counsel of any of the parties, nor a relative
 14 or employee of any attorney or counsel connected
 15 with the action, nor financially interested in
 16 the action.
 17 WITNESS MY HAND and official seal in the
 18 City of West Palm Beach, County of Palm Beach,
 19 State of Florida, this 19th day of April 2010.
 20
 21 
 22 TERRI BECKER, Registered
 23 Professional Reporter and
 24 Notary Public, State of Florida
 25 at Large. My Commission expires
 March 13, 2011.

1 question. It interferes with the
 2 attorney/client relationship that I have
 3 with Ms. Marcinkova and any discussions she
 4 and I may have had would come under that
 5 privilege.
 6 You can try and dance around that, but
 7 I'm simply not going to allow her to answer
 8 that question. If you want to bring it up
 9 with the Judge, you can.
 10 MR. EDWARDS: Thanks, Jack.
 11 MR. GOLDBERGER: Okay.
 12 THE VIDEOGRAPHER: Off the video record
 13 at 1:41 p.m.
 14 THE COURT REPORTER: You're ordering
 15 this, Brad?
 16 MR. EDWARDS: Yes. Copies?
 17 MS. EZELL: Yes.
 18 MR. YAREMA: Yes.
 19 THE COURT REPORTER: And Adam wanted it;
 20 is that right?
 21 MR. EDWARDS: Yes.
 22 (Time noted: 1:45 p.m.)
 23
 24
 25

1 THE STATE OF FLORIDA)
 2 COUNTY OF PALM BEACH)
 3
 4
 5 The foregoing certificate was
 6 acknowledged before me this _____
 7 day of _____ 2010.
 8
 9
 10
 11
 12
 13
 14
 15 _____
 16 Notary Public, State of Florida.
 17 My commission No.
 18 Expires March 13, 2011.
 19
 20
 21
 22
 23
 24
 25