# 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: Cynthia Hopkins, RPR, FPR Notary Public, State of Florida Prose Court Reporting Job No.: 1317

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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?

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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.

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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?

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Page 60 1 THE WITNESS: I don't know. 2 BY MR. EDWARDS: 3 Ο. 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? Α. 8 Right. 9 Well, in the course of the negotiation Ο. 10 with the federal government and the U.S. Attorney's 11 Office, they, the agreement between Mr. Epstein and the U.S. Attorney's office mentions people that are 12 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 Α. No. 19 Q. Okay. 20 Α. I am not aware of this. 21 Okay. Ο. 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

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Page 61 1 Nadia Marcinkova all people that you would also 2 consider within the organization? 3 Α. Yes. 4 Ο. Okay. So, we just added three more names 5 Who else would you consider, Ghislaine to it. 6 Maxwell? 7 Α. Yes. 8 And who else? Ο. 9 Α. Who was working there? Bella, Richard Kahn, Leslie Groff, 10 0. 11 Ghislaine Maxwell, Nadia, Sarah, Adriana. 12 I think Harry was involved with the Α. 13 accounting. 14 Ο. Okay. 15 Α. I don't recall his last name. 16 Somebody else involved with the 0. 17 accounting? 18 Α. Yes. Any of those people that you just 19 Q. Okay. 20 named, were any of those people that you just named the person that you described as the gentleman that 21 22 assisted Adriana in removing the computers from the 23 house prior to the search warrant being executed? 24 You mean the one who show up to do those Α. No. 25 computers?

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