

Exhibit O

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/Counterclaim Defendants,

vs.

ALAN M. DERSHOWITZ,

Defendant/Counterclaim Plaintiff.

VIDEOTAPED DEPOSITION OF

PAUL G. CASSELL

TAKEN ON BEHALF OF THE DEFENDANT

VOLUME I, PAGES 1 to 151

Friday, October 16, 2015

1:33 p.m. - 4:31 p.m.

110 Southeast 6th Street
110 Tower - Suite 1850
Fort Lauderdale, Florida 33301

Theresa Tomaselli, RMR

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(954) 331-4400

1 That is the basis for that particular
2 allegation.

3 Q. Mr. Cassell, does the police report you're
4 referring to, at any point, say Professor Dershowitz
5 abused any of these particular minors -- not were they
6 abused at the mansion -- but did it say anywhere that
7 Professor Dershowitz did that?

8 A. The police report itself does not refer to
9 Professor Dershowitz abusing these girls. However, when
10 you look at the police report, what it shows is a
11 pattern of egregious sexual abuse of approximately 23 to
12 24 young girls over an extended period of time at a
13 mansion that was owned by Jeffrey Epstein, who was one
14 of the closest personal friends, from what I could
15 gather, of Mr. Dershowitz.

16 And so that was -- there -- there's other
17 information. I don't want to filibuster you on that. I
18 would be happy to elaborate on that, but that is the
19 first piece of evidence that I would begin referring to.

20 If you want a more -- if you want -- just so
21 the record is clear, if you want to know all the
22 bases -- all the grounds for which that allegation
23 appears, then I would like to make a more extended
24 presentation.

25 Q. We -- we will get there. But my -- my -- I

1 think you will need a standing objection.

2 MR. SIMPSON: Well, I'll just make the
3 objection there and --

4 MR. SCAROLA: Thank you.

5 MR. SIMPSON: -- I will go back to my
6 question.

7 BY MR. SIMPSON:

8 Q. My question had nothing to do with whether
9 you could identify girls that Jeffrey Epstein abused.
10 My question was: As of December 30th, 2014 -- and you
11 don't have to give me the name right now -- is there any
12 specific girl that you had evidence Professor Dershowitz
13 abused?

14 A. What I had was the police report moving girls
15 and the girls were named in the police report, although
16 the police report that I think has been made public has
17 the names redacted. Those girls were moving through the
18 mansion at the time when, for example, household staff
19 were saying that Mr. Dershowitz was receiving massages.

20 And so, yes, I have 24 names in mind as
21 possible sexual abuse victims that Dershowitz may or may
22 not have abused. And I have not been able to pinpoint
23 exactly what happened, because the people who would be
24 in the best position to help me sort out what the names
25 were, specifically Jeffrey Epstein, among others, have

1 refused to cooperate and give me those names.

2 MR. SIMPSON: Move to strike the
3 nonresponsive portion of the answer.

4 THE WITNESS: Can I ask what part of that was
5 nonresponsive in your view?

6 MR. SCAROLA: That -- that's all right.

7 THE WITNESS: Okay.

8 MR. SCAROLA: Professor Cassell, you don't
9 need to do that.

10 THE WITNESS: Okay.

11 BY MR. SIMPSON:

12 Q. If I understood you correctly, you said in
13 that answer, which I think -- strike that.

14 If I understood you correctly, you said in
15 that answer that there was a universe of 24 girls, I
16 believe you said, or approximately, that Professor
17 Dershowitz may or may not have abused; is that your --
18 your -- your position?

19 A. That's correct. It's been impossible to
20 narrow down exactly what happened because of the lack of
21 cooperation from, for example, Jeffrey Epstein.

22 Q. If as of December 30th, 2014, based on your
23 information, Professor Dershowitz may or may not have
24 abused other minors, why did you allege that he did?

25 A. Your question, as I understood it, was did I

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VIDEOTAPED DEPOSITION OF
PAUL G. CASSELL
TAKEN ON BEHALF OF THE DEFENDANT
VOLUME II, PAGES 152 to 335

Saturday, October 17, 2015

8:32 a.m. - 12:14 p.m.

425 North Andrews Avenue
Suite 2
Fort Lauderdale, Florida 33301

Theresa Tomaselli, RMR

1 of the flight logs support that proposition?

2 A. The face of the flight logs for the relevant
3 period of time, we can call it the hot period of time or
4 whatever you want, did not reveal the presence of
5 Mr. Dershowitz on those flights, yes.

6 Q. Okay. So during the period -- well,
7 actually, there's no flight log that shows Virginia
8 Roberts and Professor Dershowitz on the same airplane,
9 correct?

10 A. That's my understanding, yes.

11 Q. And --

12 MR. SCAROLA: By name. You're -- you're --

13 MS. McCAWLEY: And it --

14 MR. SCAROLA: -- asking whether she was there
15 identified by name?

16 BY MR. SIMPSON:

17 Q. To your knowledge, isn't it correct that
18 there is no flight log that's been produced in this case
19 by any party that reflects Professor Dershowitz and
20 Virginia Roberts on the same plane, as you read the
21 flight log?

22 MR. SCAROLA: I'm sorry. Are you asking
23 whether those same names appear on the flight log
24 together?

25 MR. SIMPSON: My question, I think, is

1 A. Yes. In part. I mean, there are other
2 reasons it's significant, as we have been talking about,
3 names are circled who appear to have relevant
4 information on Jeffrey Epstein's criminal activities.

5 Q. Donald Trump was a friend of Jeffrey Epstein;
6 is that not correct?

7 A. I really don't -- my understanding is, yes,
8 but I -- I don't have a lot of information about Trump.

9 Q. It's true also, is it not, that Mr. Trump was
10 a frequent visitor to Mr. Epstein's residence?

11 A. I -- I know that he visited frequent. I -- I
12 don't have a lot of information about Trump.

13 Q. And his name is circled in this book; is it
14 not?

15 A. I believe it is.

16 Q. Based on him -- assuming he's a frequent
17 visitor to Mr. Epstein's home, and that he's a friend of
18 Mr. Epstein's, and that his name is circled in this
19 book, do you infer that he was engaged in criminal
20 sexual abuse of minors?

21 MS. McCawley: I'm going to object to the
22 extent that your answer would reveal anything
23 that my client has told you.

24 THE WITNESS: No.
25