

EXHIBIT 22

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

<p>1 April 13, 2010</p> <p>2 INDEX</p> <p>3 WITNESS DIRECT CROSS REDIRECT RECROSS</p> <p>4 NADIA MARCINKOVA</p> <p>5 BY MR. EDWARDS 5 98</p> <p>6 BY MR. HOROWITZ 65</p> <p>7 BY MR. LANGINO 77</p> <p>8 BY MS. EZELL 81</p> <p>9</p> <p>10 EXHIBITS</p> <p>11 PLAINTIFF'S</p> <p>12 FOR IDENTIFICATION PAGE</p> <p>13 1 Message dated August 21, 2005. 45</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>2</p> <p>4</p> <p>1 APPEARANCES (CONTINUED)</p> <p>2 LEOPOLD-KUVIN</p> <p>3 Attorneys for Plaintiffs</p> <p>4 B.B. and C.F.</p> <p>5 2925 PGA Boulevard, Suite 200</p> <p>6 Palm Beach Gardens, Florida 33410</p> <p>7 Tel: (561) 515-1400</p> <p>8 BY: ADAM J. LANGINO, ESQ.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>PODHURST, ORSECK</p> <p>Attorneys for Jane Does 1 and 3</p> <p>City National Bank Building, Suite 88</p> <p>25 West Flagler Street</p> <p>Miami, Florida 33130</p> <p>Tel: (954) 463-4346</p> <p>BY: KATHERINE W. EZELL, ESQ.</p> <p>BURMAN, CRITTON, LUTTIER & COLEMAN, LLP</p> <p>Attorneys for Defendant Jeffrey Epstein</p> <p>303 Banyon Boulevard, Suite 400</p> <p>West Palm Beach, Florida 33401</p> <p>Tel: (561) 842-2820</p> <p>BY: DAVID YAREMA, ESQ.</p> <p>ROBERT CRITTON, ESQ.</p> <p>ATTERBURY, GOLDBERGER & WEISS</p> <p>Co-Counsel for Defendants</p> <p>One Clearlake Centre</p> <p>Suite 1400</p> <p>West Palm Beach, Florida 33401</p> <p>Tel: (561) 659-8300</p> <p>BY: JACK A. GOLDBERGER, ESQ.</p> <p>ALSO PRESENT:</p> <p>JESSICA CADWELL</p> <p>JOE ROVNER, Videographer</p> <p>(U.S. Legal)</p>
<p>3</p> <p>1 The videotaped deposition of NADIA</p> <p>2 MARCINKOVA in the above-entitled and numbered</p> <p>3 cause, was taken before me, TERRI BECKER, a</p> <p>4 Registered Professional Reporter and Notary</p> <p>5 Public for the State of Florida at Large, at 444</p> <p>6 West Railroad Avenue, in the City of West Palm</p> <p>7 Beach, Palm Beach County, in the State of</p> <p>8 Florida, beginning at the hour of 10:00 o'clock</p> <p>9 a.m., pursuant to the Notice in said cause for</p> <p>10 the taking of said deposition which is annexed to</p> <p>11 the court file herein, on behalf of the PLAINTIFF</p> <p>12 in the above-entitled action pending in the</p> <p>13 above-named court.</p> <p>14 The appearances at said time and place</p> <p>15 were as follows:</p> <p>16 FARMER, JAFFE, WEISSING, EDWARDS,</p> <p>17 FISTOS & LEHRMAN, PL</p> <p>18 Attorneys for Plaintiffs Jane Does,</p> <p>19 L.N. and E.W.</p> <p>20 425 North Andrews Avenue</p> <p>21 Suite 2</p> <p>22 Fort Lauderdale, Florida 33301</p> <p>23 Tel: (954) 524-2820</p> <p>24 BY: BRADLEY J. EDWARDS, ESQ.</p> <p>25</p> <p>MERMELSTEIN & HOROWITZ, P.A.</p> <p>Attorneys for Plaintiffs Jane Does,</p> <p>numbers 2 through 8</p> <p>18205 Biscayne Boulevard</p> <p>Suite 2218</p> <p>Miami, Florida 33160</p> <p>Tel: (305) 931-2200</p> <p>BY: ADAM D. HOROWITZ, ESQ.</p>	<p>5</p> <p>1 THEREUPON,</p> <p>2 N A D I A M A R C I N K O V A</p> <p>3 being by Terri Becker first duly sworn to tell</p> <p>4 the whole truth, as hereinafter certified,</p> <p>5 testified as follows:</p> <p>6 DIRECT EXAMINATION</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q Can you tell us your name.</p> <p>9 A Nadia Marcinkova.</p> <p>10 Q What is your date of birth?</p> <p>11 A February 21, 1985.</p> <p>12 Q What is your Social Security number?</p> <p>13 A Under advice of my counsel, I invoke my</p> <p>14 privileges under the Fifth and Sixth Amendments</p> <p>15 to the United States Constitution and</p> <p>16 respectfully decline to answer the question.</p> <p>17 Q Where were you born?</p> <p>18 A I'm sorry, though I would like to answer</p> <p>19 your question, I must invoke my Fifth and Sixth</p> <p>20 Amendment privileges and refuse to answer your</p> <p>21 questions.</p> <p>22 Q What is your current address?</p> <p>23 MR. GOLDBERGER: There is going to be a</p> <p>24 continued, obviously, you anticipate I'm</p> <p>25 sure, continued invocation of Fifth</p>

<p>6</p> <p>1 Amendment privileges. If it is okay with</p> <p>2 all counsel, to shorten things, I'll simply</p> <p>3 have the witness say "Fifth," if that</p> <p>4 satisfies everyone's interest.</p> <p>5 MR. EDWARDS: That is fine with me.</p> <p>6 MR. GOLDBERGER: Okay, with that Cathy?</p> <p>7 MS. EZELL: Yes.</p> <p>8 MR. HOROWITZ: Yes.</p> <p>9 Q I'll reask the question, what's your</p> <p>10 current address?</p> <p>11 A Fifth.</p> <p>12 Q Are you currently living at 358 El</p> <p>13 Brillo Way with a man named Jeffrey Epstein?</p> <p>14 A The Fifth.</p> <p>15 Q Are you also familiar with an address in</p> <p>16 New York, 301 East 66th Street?</p> <p>17 A The Fifth.</p> <p>18 Q When Mr. Epstein was incarcerated in</p> <p>19 jail, you went to visit him on numerous</p> <p>20 occasions; is that correct?</p> <p>21 MR. YAREMA: Objection.</p> <p>22 A The Fifth.</p> <p>23 Q When you went to visit him you indicated</p> <p>24 to jail personnel your address was 301 East 66th</p> <p>25 Street, apartment 8-D in New York City, New York;</p>	<p>8</p> <p>1 A The Fifth.</p> <p>2 Q Do you know a lady by the name of</p> <p>3 Maritsa Vazques?</p> <p>4 A The Fifth.</p> <p>5 Q Is this somebody who helped to falsify a</p> <p>6 visa for you?</p> <p>7 MR. YAREMA: Object to the form.</p> <p>8 A The Fifth.</p> <p>9 Q Do you know Evelyn Velasaques?</p> <p>10 A The Fifth.</p> <p>11 Q Were you ever a working model in the</p> <p>12 United States?</p> <p>13 A The Fifth.</p> <p>14 Q Can you tell us your parents' names?</p> <p>15 A The Fifth.</p> <p>16 Q How is it that you have supported</p> <p>17 yourself financially, since you have been in this</p> <p>18 country?</p> <p>19 MR. YAREMA: Object to the form.</p> <p>20 A The Fifth.</p> <p>21 Q Have you supported yourself financially?</p> <p>22 A The Fifth.</p> <p>23 Q What is the last grade you completed in</p> <p>24 school?</p> <p>25 A The Fifth, I take the Fifth Amendment.</p>
<p>7</p> <p>1 is that correct?</p> <p>2 MR. YAREMA: Objection.</p> <p>3 A Fifth.</p> <p>4 Q Isn't it true when Mr. Epstein was in</p> <p>5 jail, you visited him on more than 50 occasions?</p> <p>6 MR. YAREMA: Form objection.</p> <p>7 Q True?</p> <p>8 A The Fifth.</p> <p>9 Q How long have you been in the United</p> <p>10 States, Ms. Marcinkova?</p> <p>11 A The Fifth.</p> <p>12 Q Who brought you to the United States?</p> <p>13 MR. YAREMA: Form objection.</p> <p>14 A The Fifth.</p> <p>15 Q What is your current status in this</p> <p>16 country?</p> <p>17 A The Fifth.</p> <p>18 MR. YAREMA: Form objection.</p> <p>19 MR. GOLDBERGER: Let me take a half a</p> <p>20 second.</p> <p>21 (Witness and her counsel confer.)</p> <p>22 Q Are you a U.S. citizen?</p> <p>23 A The Fifth.</p> <p>24 Q What type of visa are you here on?</p> <p>25 MR. YAREMA: Form objection.</p>	<p>9</p> <p>1 Q Are you in school now?</p> <p>2 A The Fifth.</p> <p>3 Q Have you ever attended any school in the</p> <p>4 United States?</p> <p>5 A The Fifth.</p> <p>6 Q Have you ever been employed since</p> <p>7 residing in the United States?</p> <p>8 A The Fifth.</p> <p>9 Q Is Jeffrey Epstein your sole means of</p> <p>10 financial support today?</p> <p>11 MR. YAREMA: Object to the form.</p> <p>12 A The Fifth.</p> <p>13 Q Since coming to this country, hasn't</p> <p>14 Jeffrey Epstein always been your sole means of</p> <p>15 financial support?</p> <p>16 MR. YAREMA: Object to the form.</p> <p>17 A The Fifth.</p> <p>18 Q How much does Jeffrey Epstein pay you</p> <p>19 today?</p> <p>20 MR. YAREMA: Object to the form.</p> <p>21 A The Fifth.</p> <p>22 Q What does every Epstein pay you for?</p> <p>23 MR. YAREMA: Object to the form.</p> <p>24 A The Fifth.</p> <p>25 Q Does he pay you specifically to be his</p>

<p style="text-align: right;">54</p> <p>1 A Fifth.</p> <p>2 Q Do you know Bill Clinton?</p> <p>3 A Fifth.</p> <p>4 Q You have been on Jeffrey Epstein's</p> <p>5 airplane with Bill Clinton?</p> <p>6 MR. YAREMA: Object to the form.</p> <p>7 A Fifth.</p> <p>8 Q Isn't take true you have been on Jeffrey</p> <p>9 Epstein's airplane with Doug Band, Bill Clinton's</p> <p>10 righthand man?</p> <p>11 MR. YAREMA: Object to the form.</p> <p>12 A Fifth.</p> <p>13 Q Have you witnessed improper sexual</p> <p>14 activity between Jeffrey Epstein and minors,</p> <p>15 while he was in the presence of Bill Clinton?</p> <p>16 MR. YAREMA: Object to the form.</p> <p>17 A Fifth.</p> <p>18 Q How many times have you ridden on the</p> <p>19 airplane with Jean Luc Brunel?</p> <p>20 MR. YAREMA: Object to the form.</p> <p>21 A Fifth.</p> <p>22 Q Each time that Jean Luc Brunel visits</p> <p>23 Jeffrey Epstein's house, does he bring underage</p> <p>24 minors to Jeffrey Epstein's house to engage in</p> <p>25 sex with?</p>	<p style="text-align: right;">56</p> <p>1 Jeffrey Epstein specifically flew to Palm Beach</p> <p>2 for the purposes of engaging in sex acts with</p> <p>3 Jane Doe?</p> <p>4 MR. YAREMA: Object to the form.</p> <p>5 A Fifth.</p> <p>6 Q Generally, isn't it true Jeffrey Epstein</p> <p>7 would fly from place to place for the purpose of</p> <p>8 engaging in sexual activity with minors at his</p> <p>9 destination?</p> <p>10 MR. YAREMA: Object to the form.</p> <p>11 A Fifth.</p> <p>12 Q Isn't it true that he employed numerous</p> <p>13 people for the sole purpose of scheduling</p> <p>14 appointments with underage minor females at each</p> <p>15 destination he landed?</p> <p>16 MR. YAREMA: Object to the form.</p> <p>17 A Fifth.</p> <p>18 Q What is Jeffrey Epstein's relationship</p> <p>19 with Sandy Berger?</p> <p>20 MR. YAREMA: Object to the form.</p> <p>21 A Fifth.</p> <p>22 Q Do you know what Jeffrey Epstein's</p> <p>23 relationship is with Alan Dershowitz?</p> <p>24 MR. YAREMA: Object to the form.</p> <p>25 A Fifth.</p>
<p style="text-align: right;">55</p> <p>1 MR. YAREMA: Object to the form.</p> <p>2 A Fifth.</p> <p>3 Q Do you know Glenn Dubin?</p> <p>4 A Fifth.</p> <p>5 Q Do you know Aline Weber?</p> <p>6 A Fifth.</p> <p>7 Q Is that somebody that was a sexual abuse</p> <p>8 victim at one point in time of Jeffrey Epstein</p> <p>9 and Jean Luc Brunel?</p> <p>10 MR. YAREMA: Object to the form.</p> <p>11 A Fifth.</p> <p>12 Q Between 2002 and 2005 when E.W. was</p> <p>13 abused by Jeffrey Epstein sexually, isn't it true</p> <p>14 that Jeffrey Epstein took flights to Palm Beach</p> <p>15 for the purposes of sexually abusing E.W.?</p> <p>16 MR. YAREMA: Object to the form.</p> <p>17 A Fifth.</p> <p>18 Q And between those same years of 2002 and</p> <p>19 2005, isn't it true that Jeffrey Epstein took</p> <p>20 airplane flights to Palm Beach from places</p> <p>21 outside of the State, to engage in sexual acts</p> <p>22 with L.M.?</p> <p>23 MR. YAREMA: Object to the form.</p> <p>24 A Fifth.</p> <p>25 Q From 2003 through 2005, isn't it true</p>	<p style="text-align: right;">57</p> <p>1 Q That's somebody who you know to have</p> <p>2 stayed at Jeffrey Epstein's house on many</p> <p>3 occasions, correct?</p> <p>4 MR. YAREMA: Object to the form.</p> <p>5 A Fifth.</p> <p>6 Q And also somebody who you know to have</p> <p>7 been at the house when E.W. was in Jeffrey</p> <p>8 Epstein's bedroom getting sexually abused,</p> <p>9 correct?</p> <p>10 MR. YAREMA: Object to the form.</p> <p>11 A Fifth.</p> <p>12 Q Alan Dershowitz is also somebody that</p> <p>13 you also know to have been at the house when L.M.</p> <p>14 was being sexually abused in Jeffrey Epstein's</p> <p>15 bedroom, correct?</p> <p>16 MR. YAREMA: Object to the form.</p> <p>17 A Fifth.</p> <p>18 Q Generally, Alan Dershowitz is familiar</p> <p>19 with Jeffrey Epstein's habit of engaging in</p> <p>20 sexual acts with minors on a daily basis,</p> <p>21 correct?</p> <p>22 MR. YAREMA: Object to the form.</p> <p>23 A Fifth.</p> <p>24 Q When Alan Dershowitz was in town,</p> <p>25 Jeffrey Epstein did not break his schedule for</p>

<p style="text-align: right;">58</p> <p>1 Alan Dershowitz, meaning he continued to sexually</p> <p>2 abuse minors despite Alan Dershowitz being a</p> <p>3 guest in the house?</p> <p>4 MR. YAREMA: Object to the form.</p> <p>5 A Fifth.</p> <p>6 Q Alan Dershowitz never engaged in any</p> <p>7 sexual activity with these underage minors; isn't</p> <p>8 that true?</p> <p>9 MR. YAREMA: Object to the form.</p> <p>10 A Fifth.</p> <p>11 Q Have you been made to have sex with</p> <p>12 Ghislaine Maxwell?</p> <p>13 MR. YAREMA: Object to the form.</p> <p>14 A Fifth.</p> <p>15 Q Do you know Emmy Taylor?</p> <p>16 A Fifth.</p> <p>17 Q Similar to you being Jeffrey Epstein's</p> <p>18 sex slave, is Emmy Taylor, or was Emmy Taylor</p> <p>19 Ghislaine Maxwell's sex slave?</p> <p>20 MR. YAREMA: Object to the form.</p> <p>21 A Fifth.</p> <p>22 Q Ghislaine Maxwell is somebody who you</p> <p>23 know to be bi-sexual, true?</p> <p>24 MR. YAREMA: Object to the form.</p> <p>25 A Fifth.</p>	<p style="text-align: right;">60</p> <p>1 Q What was the purpose of that flight?</p> <p>2 MR. YAREMA: Object to the form.</p> <p>3 A Fifth.</p> <p>4 Q Did you sign a confidentiality agreement</p> <p>5 with Jeffrey Epstein?</p> <p>6 MR. YAREMA: Object to the form.</p> <p>7 A Fifth.</p> <p>8 Q When is the last time that you observed</p> <p>9 Jeffrey Epstein have sex with a minor?</p> <p>10 MR. YAREMA: Object to the form.</p> <p>11 A Fifth.</p> <p>12 Q Since being on probation, has Jeffrey</p> <p>13 Epstein been able to, or has he flown to his</p> <p>14 island?</p> <p>15 MR. YAREMA: Object to the form.</p> <p>16 A Fifth.</p> <p>17 Q To your knowledge, has Jeffrey Epstein</p> <p>18 flown to New York while on probation or community</p> <p>19 control?</p> <p>20 MR. YAREMA: Object to the form.</p> <p>21 A Fifth.</p> <p>22 Q Isn't it true that he has flown both to</p> <p>23 New York and to his island, and you have</p> <p>24 accompanied him on those trips, since he was on</p> <p>25 community control?</p>
<p style="text-align: right;">59</p> <p>1 Q You know that Ghislaine Maxwell engaged</p> <p>2 in sexual acts with underage minor females, true?</p> <p>3 MR. YAREMA: Object to the form.</p> <p>4 A Fifth.</p> <p>5 Q This is yet another friend of Jeffrey</p> <p>6 Epstein's that is into the act of molesting</p> <p>7 underage minor females, right?</p> <p>8 MR. YAREMA: Object to the form.</p> <p>9 A Fifth.</p> <p>10 Q Now, you are the next participant in</p> <p>11 that activity, meaning you have been groomed to</p> <p>12 enjoy and appreciate the acts of sex with</p> <p>13 underage minors, true?</p> <p>14 MR. YAREMA: Object to the form.</p> <p>15 A Fifth.</p> <p>16 Q Has Jeffrey Epstein instructed you to</p> <p>17 lie to his Probation Officer in any way?</p> <p>18 MR. YAREMA: Object to the form.</p> <p>19 A Fifth.</p> <p>20 Q Mr. Visoski testified that you took a</p> <p>21 helicopter flight within the last year with</p> <p>22 Jeffrey Epstein to Miami. Do you remember that</p> <p>23 flight?</p> <p>24 MR. YAREMA: Object to the form.</p> <p>25 A Fifth.</p>	<p style="text-align: right;">61</p> <p>1 MR. YAREMA: Object to the form.</p> <p>2 A Fifth.</p> <p>3 Q Isn't it also true that Jeffrey Epstein</p> <p>4 has indicated to you that he will always engage</p> <p>5 in sex acts with underage minor females?</p> <p>6 MR. YAREMA: Object to the form.</p> <p>7 A Fifth.</p> <p>8 Q In fact, that's something that he has</p> <p>9 told you, that he believes he is entitled to do;</p> <p>10 isn't that right?</p> <p>11 MR. YAREMA: Object to the form.</p> <p>12 A Fifth.</p> <p>13 Q Isn't it true that Jeffrey Epstein</p> <p>14 believes and has told you that if he doesn't</p> <p>15 physically force the underage minor female into</p> <p>16 any act, then he is entitled to engage in sex</p> <p>17 with any underage minor female despite the age?</p> <p>18 MR. YAREMA: Object to the form.</p> <p>19 A Fifth.</p> <p>20 Q What is the youngest female you have</p> <p>21 witnessed or observed Jeffrey Epstein to engage</p> <p>22 in sex with?</p> <p>23 MR. YAREMA: Object to the form.</p> <p>24 A Fifth.</p> <p>25 Q Do you have a bank account at Chase Bank</p>

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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

99

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.)

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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.

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1 THE STATE OF FLORIDA)

2 COUNTY OF PALM BEACH)

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5 The foregoing certificate was

6 acknowledged before me this _____

7 day of _____ 2010.

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15 _____

16 Notary Public, State of Florida.

17 My commission No.

18 Expires March 13, 2011.

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