

From: J [jeevacation@gmail.com]

Sent: 5/30/2019 11:43:25 AM

To: Michael Wolff

Subject: Re: privileged

[https://www.rawstory.com/2019/05/new-book-paints-sordid-picture-of-trump-real-estate-deal-involving-](https://www.rawstory.com/2019/05/new-book-paints-sordid-picture-of-trump-real-estate-deal-involving-russian-oligarch-and-jeffrey-epstein/)

[russian-oligarch-and-jeffrey-epstein/](https://www.rawstory.com/2019/05/new-book-paints-sordid-picture-of-trump-real-estate-deal-involving-russian-oligarch-and-jeffrey-epstein/)

On Thu, May 30, 2019 at 7:24 AM Michael Wolff < wrote:

Expensive. But... In a way this new round of calls is an opportunity: reporters suddenly thinking they don't

know something or that there is a new angle—now would be a good moment to hit them with a better prepared

set of responses. Somebody, 011ie or otherwise, should get started on this.

On Thu, May 30, 2019 at 7:17 AM J <jeevacation@gmail.com> wrote:

hes great. he needs to get the documents from the law firms that are wholly focused on this submission to

the judge. . BTW He asked for 1 million per month. for a year. .

On Thu, May 30, 2019 at 7:13 AM Michael Wolff < wrote:

Again! Why you need a team in place! Where are you with 011ie?

On Thu, May 30, 2019 at 7:09 AM J <jeevacation@gmail.com> wrote:

lots of reporters inquiries. !. do i think that trump set me up? what do i know about his dealings? . did

i speak to you? suggestion. all public record, house bought out of a bankruptcy proceeding. I was the

stalking horse bid. . never before was there a prosecution of erotic massage by women for money in

someones home. every girl got money. returned. most interviewed by police over 21. all public record. . some concern on my team that i will get a cong subpoena. do i have to wear a tie?

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<katie johnson v trump complaint.pdf>
HOUSE OVERSIGHT 031463

From: jeffrey E. [jeeyacation@gmail.com]

Sent: 12/8/2015 9:52:40 PM

To: Landon Thomas Jr.

Subject: Re: Trump

Importance: High

when we bet that marla maples was pregnnat , i olst and sent him 10,000 dollars of baby food.
the hawain

tropic gins all have photos he was the judge

On Tue, Dec 8, 2015 at 5:50 PM, Landon Thomas Jr. < > wrote:

Yes!!!

Sent from my iPhone

On Dec 8, 2015, at 4:43 PM, jeffrey E. <jeevacation@gmail.com> wrote:

would you like photso of donald and gins in bikinis in my kitchen.

On Tue, Dec 8, 2015 at 5:41 PM, Thomas Jr., Landon < wrote:

Now everyone coming to me thinking I have juicy info on you and Trump.

Because of this.

"I've known Jeff for fifteen years. Terrific guy," Trump booms from a speakerphone. "He's a lot of
fun to be with. It is

even said that he likes beautiful women as much as I do, and many of them are on the younger
side. No doubt about it --

Jeffrey enjoys his social life."

That story will never die.

Landon Thomas, Jr.

Financial Reporter

New York Times

[http://topics.nytimes.com/top/reference/timestopics/people/t/landon jr thomas/index](http://topics.nytimes.com/top/reference/timestopics/people/t/landon_jr_thomas/index.html)

.html

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HOUSE OVERSIGHT 031597

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HOUSE OVERSIGHT 031598

From: jeffrey E. [jeeyacation@gmail.com]

Sent: 12/8/2015 9:51:09 PM

To: Thomas Jr., Landon

Subject: Re: Trump

Importance: High

read the uzz feed re my airplane logs and hawain tropic contest. / have them ask my houseman about

donad almost walking through the door leaving his nose print on the glass as young women were swimming in

the pool and he was so focused he walked straight into the door

On Tue, Dec 8, 2015 at 5:41 PM, Thomas Jr., Landon

wrote:

Now everyone coming to me thinking I have juicy info on you and Trump.

Because of this.

"I've known Jeff for fifteen years. Terrific guy," Trump booms from a speakerphone. "He's a lot of fun to be with. It is

even said that he likes beautiful women as much as I do, and many of them are on the younger side. No doubt about it –

Jeffrey enjoys his social life."

That story will never die.

Landon Thomas, Jr.

Financial Reporter

New York Times

[http://topics.nytimes.com/top/reference/timestopics/people/t/landon jr thomas/index.html](http://topics.nytimes.com/top/reference/timestopics/people/t/landon_jr_thomas/index.html)

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HOUSE OVERSIGHT 031596

From: Thomas Jr., Landon
Sent: 5/16/2016 3:56:57 PM
To: jeffrey E. [jeeyacation@gmail.com]
Subject: Re: Trump
Importance: High
is the other stuff ever going to come out?
On Mon, May 16, 2016 at 11:41 AM, jeffrey E. <jeevacation@gmail.com> wrote:
Me too
On Monday, 16 May 2016, Thomas Jr., Landon <> wrote:
I am kind of shocked that our reporters did not contact you re the Trump/women story. Seems to me he got off rather lightly.
How are you doing?
Landon Thomas, Jr.
Financial Reporter
New York Times
http://topics.nytimes.com/top/reference/timestopics/people/t/landon_jr_thomas/index.html
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Landon Thomas, Jr.
Financial Reporter
HOUSE OVERSIGHT 031467
New York Times
http://topics.nytimes.com/top/reference/timestopics/people/t/landon_jr_thomas/index.html
HOUSE OVERSIGHT 031468

From: Michael Wolff
Sent: 4/28/2016 7:00:45 PM
To: jeffrey E. [jeeyavacation@gmail.com]
Subject: Re: Reuters / lawsuit against Jeffrey Epstein
Importance: High

Well, I guess if there's anybody who can wave this away, it's Donald. Let me know if there's anything I can do.

On Thursday, April 28, 2016, jeffrey E. <jeeyavacation@gmail.com> wrote:
here we go

-----Forwarded message-----

From: Martin Weinberg iMiniMIM>
Date: Thu, Apr 28, 2016 at 12:20 PM
Subject: Fwd: Reuters / lawsuit against Jeffrey Epstein
To: Jeff Epstein <jeeyavacation@gmail.com>
Reporter said 1994 claim fed ct California
Will go to press in several hrs
Sent from my iPhone
Begin forwarded message:

From: -
Date: April 28, 2016 at 12:14:37 PM EDT
To: <MMLIMI>
Subject: RE: Reuters / lawsuit against Jeffrey Epstein
Sorry, the suit is attached to this email.
From: Ingram, David (Reuters News)
Sent: Thursday, April 28, 2016 12:14 PM
To: 'Martin G. Weinberg'
Subject: Reuters / lawsuit against Jeffrey Epstein

Hi Marty,

The attached lawsuit was filed this week in federal court in California alleging that Jeffrey Epstein and another man, Donald Trump, raped her in 1994. We're planning to publish a story on the suit this afternoon, and we want to make sure it is fair. Is Mr. Epstein available to speak? Or do you want to offer a comment on this behalf?

My number is _____

Thank you in advance.

David Ingram
Correspondent
Reuters News

, and I'm available any time. I also just tried your cell phone.

HOUSE OVERSIGHT 031464

Thomson Reuters

Office:

Mobile

Reuters.com

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HOUSE OVERSIGHT 031465

From: Lesley Grot
Sent: 4/28/2016 4:46:00 PM
To: Jeffrey Epstein [jeeyacation@gmail.com]
Subject: Re: Reuters / lawsuit against Jeffrey Epstein
Importance: High

ok...

so sorry...

On Apr 28, 2016, at 12:42 PM, jeffrey E. <jeevacation@gmail.com> wrote:

-----Forwarded message-----

From: Martin Weinberg
Date: Thu, Apr 28, 2016 at 12:20 PM
Subject: Fwd: Reuters / lawsuit against Jeffrey Epstein
To: Jeff Epstein <jeevacation@gmail.com>
Privileged - Redacted
Begin forwarded message:

From: <

Date: April 28, 2016 at 12:14:37 PM EDT

To: <

Subject: RE: Reuters / lawsuit against Jeffrey Epstein

Sorry, the suit is attached to this email.

From: Ingram, David (Reuters News)

Sent: Thursday, April 28, 2016 12:14 PM

To: 'Martin G. Weinberg'

Subject: Reuters / lawsuit against Jeffrey Epstein

Hi Marty,

The attached lawsuit was filed this week in federal court in California alleging that Jeffrey Epstein and another

man, Donald Trump, raped her in 1994. We're planning to publish a story on the suit this afternoon, and we

want to make sure it is fair. Is Mr. Epstein available to speak? Or do you want to offer a comment on this behalf?

My number is

Thank you in advance.

David Ingram

and I'm available any time. I also just tried your cell phone.

HOUSE OVERSIGHT 031462

Correspondent

Reuters News

Thomson Reuters

Reuters.com

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<katie johnson v trump complaint.pdf>
HOUSE OVERSIGHT 031463

From: Thomas Jr., Landon
Sent: 12/8/2015 10:18:54 PM
To: jeffrey E. [jeeyavacation@gmail.com]
Subject: Re: Trump
Importance: High

Amazing! When is last time you talked to him?

On Tue, Dec 8, 2015 at 5:14 PM, jeffrey E. <jeeyavacation@gmail.com> wrote:
<http://en.actu-cci.com/features/200-women-managers/8910-celina-midelfart-the-queen-of-glamour>
my 20

year old girlfriend in 93., that after two years i gave to donald

On Tue, Dec 8, 2015 at 5:03 PM, Thomas Jr., Landon < > wrote:

I am serious man -- for the good of the nation why not try to get some of this out there. I would not do it myself, but would pass on to a political reporter.

<http://www.buzzfeed.com/alexcampbell/court-papers-trump-ate-at-jeffrey-epsteins-house#.1toekLMRz6>

Plus: look at these lies!

In response to a message left seeking the Trump campaign's comment on this article, on Thursday Trump's general counsel Alan Garten emailed threatening legal action against BuzzFeed News. "Mr. Trump's only connection with Mr. Epstein was that Mr. Epstein was one of thousands of people who has visited Mar-a-Lago. That's it. Mr. Trump has NEVER been accused of having any involvement or even having any knowledge of any of Mr. Epstein's conduct by anyone," Garten wrote.

"As a result, I have no idea what the purpose of your article could possibly be other than to try and intentionally and with actual malice defame my client's name and reputation by mentioning him in the same article as Mr. Epstein. In other words, suggest guilt by association. This is the very definition of irresponsible and reckless journalism and to publish such a story would be highly unethical - even by buzzfeed's standards."

On Tue, Dec 8, 2015 at 4:53 PM, jeffrey E. <jeeyavacation@gmail.com> wrote:

hawain tropic girl

lauren petrella <

On Tue, Dec 8, 2015 at 5:50 PM, Landon Thomas Jr. wrote:

Yes!!!

Sent from my iPhone

On Dec 8, 2015, at 4:43 PM, jeffrey E. <jeeyavacation@gmail.com> wrote:

would you like photso of donald and girls in bikinis in my kitchen.

On Tue, Dec 8, 2015 at 5:41 PM, Thomas Jr., Landon <_____> wrote:

Now everyone coming to me thinking I have juicy info on you and Trump.

Because of this.

HOUSE OVERSIGHT 031454

I "I've known Jeff for fifteen years. Terrific guy," Trump booms from a speakerphone. "He's a lot of fun to be with. It is even said that he likes beautiful women as much as I do, and many of them are on the younger side. No doubt about

it -- Jeffrey enjoys his social life."

That story will never die.

Landon Thomas, Jr.

Financial Reporter

New York Times

<http://topics.nytimes.com/top/reference> Landon jr thomas/ind
ex.html

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Landon Thomas, Jr.
Financial Reporter
New York Times

[http://topics.nytimes.com/top/reference/timestopics/people/t/landon jr thomas/index.html](http://topics.nytimes.com/top/reference/timestopics/people/t/landon_jr_thomas/index.html)

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Landon Thomas, Jr.
Financial Reporter
New York Times

[http://topics.nytimes.com/top/reference/timestopics/people/t/landon jr thomas/index.h](http://topics.nytimes.com/top/reference/timestopics/people/t/landon_jr_thomas/index.html)
tml

HOUSE OVERSIGHT 031456

From: J [jeevacation@gmail.com]

Sent: 1/31/2019 10:47:52 PM

To: Michael Wolff

_____ worked at mara lago. . she was the one that accused prince andrew. . trump said

he asked

me to resign, never a member ever. . of course he knew about the girls as he asked ghislaine to stop

please note

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HOUSE OVERSIGHT 030411

of Taking Deposition
will follow. Mr. Trump's deposition is scheduled for August 18, 2009.

From: Jessica Cadwell [mailto:_____]

Sent: Monday, August 10, 2009 3:31 PM

To: Jacquie Johnson

Subject: RE: Jane Doe

No not likely. They just filed an emergency protective order

frJaca eY, Yccia'

Certified Paralegal

Florida Registered Paralegal

BURMAN CRITTON LUTTIER & COLEMAN, LLP

515 N. Flagler Drive

Suite #400

West Palm Beach, FL 33401

From: Jacquie Johnson [mailto:_____]

Sent: Monday, August 10, 2009 3:18 PM

To: Jessica Cadwell

Subject: RE: Jane Doe

Jessica — is the depo of going forward on Friday

From: Jessica Cadwell [mailto:_____]

Sent: Monday, August 10, 2009 12:10 PM

To: Jacquie Johnson

Subject: RE: Jane Doe

I didnt forget about this...

Still working on it.

frJaca eY, Yccia'

Certified Paralegal

Florida Registered Paralegal

BURMAN CRITTON LUTTIER & COLEMAN, LLP

HOUSE OVERSIGHT 029881

515 N. Flagler Drive

Suite #400

West Palm Beach FI 33401

From: Jacquie Johnson [mailto:_____]

Sent: Thursday, August 06, 2009 10:47 AM

To: Jessica Cadwell

Subject: RE: Jane Doe

Jessica — I need a date for the deposition of Mr. Epstein. Can you provide me with one please?

From: Jessica Cadwell [mailto:_____]

Sent: Thursday, August 06, 2009 10:20 AM

To: Jacquie Johnson

Subject: RE: Jane Doe

Great thank you. Do you have your Stays signed yet?

frJaca &dazeEE e9), Yccia'

Certified Paralegal

Florida Registered Paralegal

BURMAN CRITTON LUTTIER & COLEMAN, LLP

515 N. Flagler Drive

Suite #400

West Palm Beach, FL 33401

To: Jessica Cadwell; Bradley J. Edwards

Cc: Robert D. Critton Jr.

Subject: RE: Jane Doe

Brad is out of the office until this afternoon — I will ask him then.

From: Jessica Cadwell [mailto:

Sent: Thursday, August 06, 2009 9:51 AM

To: Bradley J. Edwards

Cc: Jacquie Johnson; Robert D. Critton Jr.

Subject: Jane Doe

Brad —

In your answers to ROGS, you list Milton Center for girls as facility that Jane Doe attended. Milton Center is a

Department of Juvenile Justice facility; therefore I will need to get her records from DJJ. DJJ will not release the records

without a signed release by Jane Doe. I have attached a general HIPPA release for your review.

Would you please have

Jane Doe sign it? DJJ does not have a standard form.

Also, will you agree to one more week on Responses to Net Wirth ROGS??

Please let me know.

Jess —

HOUSE OVERSIGHT 029882

frJge..a e9), Yccia'

Certified Paralegal

Florida Registered Paralegal

BURMAN CRITTON LUTTIER & COLEMAN, LLP

515 N. Flagler Drive

Suite #400

West Palm Beach, FL 33401

HOUSE OVERSIGHT 029883

From: J [jeevacation@gmail.com]
Sent: 1/31/2019 10:47:52 PM
To: Michael Wolff [REDACTED]

[REDACTED] **VICTIM** [REDACTED] mara lago. [REDACTED] . trump said he asked me to resign, never a member ever. . of course he knew about the girls as he asked ghislaine to stop

--

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From: Gmax [gmax1@ellmax.com]
Sent: 4/2/2011 7:09:39 PM
To: jeevacation@gmail.com
Subject: Re:

Importance: High

I have been thinking about that...

----- Original Message -----

From: Jeffrey Epstein <jeevacation@gmail.com>
To: Gmax
Sent: Sat Apr 02 14:25:45 2011
Subject:

i want you to realize that that dog that hasn't barked is trump.. **VICTIM** spent hours at my house with him ,, he has never once been mentioned. police chief. etc. im 75 % there

--

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1 of 5 mentions



-----Forwarded message-----

From: J <jeevacation@gmail.com>

Date: Fri, Feb 1, 2019 at 5:18 AM

Subject:

To: jeffrey epstein <jeevacation@gmail.com>

prostitution is a state crime, never before a man in his own house charged with soliciting. ! in Florida first

offenders are required to take a sex ed class and get pre trial diversion, no criminal record. . .

there is a

felony solicitation for the THIRD offense. . A grand jury was held and they found me guilty of one count of

felony soliticiation. because there were many girls. . mandatory diversion. sentence. !!!! a grand jury

. usually only for capital murder cases. . Recarey and Reiter (police chief). pulled my garbage for months,

and surveilled the house . letting all the gilrs come and go ? ! called in the FBI. they did not like the grand

jury result. and released to the press, the raw sewage of police interviews , ie, no girl was cross examined

EVER. . Unheard of . - the girls returned the house multiplie times. for 200 dollars for a rub and tug. . no sex. . some worked in the locak massage parlors, most in thier mid twenties.. There is only

press stories told my strippers of me buying my girlfiedn from slovakia from her parents . girls under

15. . all made up to get press. . FBI / puts a task force together title" operation leap year" to investigate

my personal massage activity ?! nuts. interviews my chiropractor ? medical info. . etc.

worked at Mara Lago. [REDACTED] knew of it. and came to my house many times during that

period. The testimony of the houseman John allessi confirmed it. He never got a massage.

abe gosman a friend of mine. ran into financial difficulty with assited living homes. . His home was listed

at 45 million dollars. with no takers for months on end . He and I agreed a price of 30m. (His wife

ends up going to jail for lying to the b [REDACTED] er jewelry.) this is in the summer of 04. . I

became the stalking horse bidder at 30 m. ie if someone bid higher I would receive a fee.

From: J [jeevacation@gmail.com]

Sent: 12/15/2018 4:24:32 PM

To: Michael Wolff

Subject: Re: Chat? #?

The allegation: Harth claimed that Trump made repeated unwanted sexual advances as she and her romantic partner at the time, George Houraney, pursued a business relationship with the mogul in the early 1990s. She said that on January 24, 1993, at Mar-a-Lago, Trump offered her a tour of the estate, then pulled her into his daughter Ivanka's empty bedroom.

"He pushed me up against the wall, and had his hands all over me and tried to get up my dress again," Harth said, "and I had to physically say: 'What are you doing? Stop it.' It was a shocking thing to have him do this

because he knew I was with George, he knew they were in the next room. And how could he be doing this when I'm there for business?"

In 1997 Harth and Houraney sued Trump for breach of contract, and she filed a separate sexual-harassment suit, accusing him of "attempted rape." They reached a confidential settlement in the contract suit, and as part of the agreement Harth withdrew her suit.

On Sat, Dec 15, 2018 at 10:51 AM Michael Wolff wrote:
please note

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HOUSE OVERSIGHT 031799

From: J [jeevacation@gmail.com]
Sent: 2/1/2019 10:18:49 AM
To: Michael Wolff
Subject: Fwd:
have fun

-----Forwarded message-----

From: J <jeevacation@gmail.com>
Date: Fri, Feb 1, 2019 at 5:18 AM
Subject:
To: jeffrey epstein <jeevacation@gmail.com>
prostitution is a state crime, never before a man in his own house charged with soliciting. ! in Florida first offenders are required to take a sex ed class and get pre trial diversion, no criminal record. . . there is a felony solication for the THIRD offense. . A grand jury was held and they found me guilty of one count of felony solitciation. because there were many girls. . mandatory diversion. sentence. !!!! a grand jury . ususally only for capital murder cases. . Recarey and Reiter (police chief). pulled my garbage for months, and surveilled the house . letting all the gilrs come and go ? ! called in the FBI. they did not like the grand jury result. and released to the press, the raw sewage of police interviews , ie, no girl was cross examined EVER. . Unheard of . - the girls retunred the house multiplie times. for 200 dollars for a rub and tug. . no sex. . some worked in the locak massage parlors, most in thier mid twenties.. There is only press stories told my strippers of me buying my girlfiedn from slovakia from her parents . girls under 15. . all made up to get press. . FBI / puts a task force together title" operation leap year" to investigate my personal massage activity ?! nuts. interviews my chiropractor ? medical info. . etc.
worked at Mara Lago. Trump knew of it. and came to my house many times during that period. The testimony of the houseman John allessi confiremed it. He never got a massage.
abe gosman a friend of mine. ran into financial difficulty with assited living homes. . His home was listed at 45 million dollars. with no takers for months on end . He and I agreed a price of 30m. (His wife . ends up going to jail for lying to the bankruptcy trustee about her jewelry.) this is in the summer of 04. . I became the stalking horse bidder at 36 m. ie if someone bid higher I would receive a fee.
trump buys the house at the telephone auction. only me trump andd his friend pulty the developer.
He quickly puts it on the market for 125 million, serves the purpose of a justification for a high sale later . . and no one will touch it. it is is bough in the name of trump properties 11c..

no idea who owns it. or
what else it" owns ".

Three years later 08 he sells it to Rybolooev for approx 100 million. He should have had a 50 million plus capital gain. he tells people and press he spent 20-30 m to fix up. that would justify a reduction in capital gains, key question how did he report the sale , if he did at all on his 08 tax return.

He has no money. when he buys the house. His biz model is putting his name on a real estate development and gets a fee for using his name. The hotel biz is just that. someone else buys the hotel. hoping to make a profit from its operation and eventual sale. Trump put his name on it, and get a 2 % fee and maybe a piece of the profit if any on sale. He touts the project as " his " . just as in his current financial statements on file as president he lists his " income " as the GROSS receipts of the clubs, with no expenses deducted. not his personal revenue. ie the doral golf club loses money every year. it pays out more than it takes in , but he lists the revenue as his income. AMAZING.

HOUSE OVERSIGHT 023044

"Trump's relationship with Deutsche Bank has not always been amicable; in November 2008, he had difficulty making payments on a \$640 million Deutsch Bank loan – \$40 million of which he guaranteed personally – he took out to finance the construction of the Trump tower in Chicago."

<https://themoscowproject.org/collusion/trump-sues-deutsche-bank-3-billion/>

in july , miraculously , rybolooev ve buys the house for roughly the same" 40 plus million dollar" profit"

[https://www.washingtonpost.com/news/worldviews/wp/2017/08/24/the-russian-diplomat-found-dead-in-his-](https://www.washingtonpost.com/news/worldviews/wp/2017/08/24/the-russian-diplomat-found-dead-in-his-pool-in-sudan-is-the-seventh-to-die-since-november/?utm_term=.77b0a287fb11)

[pool-in-sudan-is-the-seventh-to-die-since-november/?utm_term=.77b0a287fb11](https://www.washingtonpost.com/news/worldviews/wp/2017/08/24/the-russian-diplomat-found-dead-in-his-pool-in-sudan-is-the-seventh-to-die-since-november/?utm_term=.77b0a287fb11)

Joe Recarey dies in june of 18. same m.o. ?

please note

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JEE

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HOUSE OVERSIGHT 023045

I have up until now, not told my side of the story. My attorneys and PR people advised me to just stay quiet, and it will all go away. I have received the same advice for five years now. I realize my silence is now causing collateral damage to my friends and other innocent bystanders. The time has come to let the hounds of investigative reporters loose on those that, driven by money, have made false claims, concocted malicious fabrications, and have expanded their fictions now to include others in my orbit.

I was investigated for soliciting underage prostitutes. To be precise, girls under the age of 18 who were brought to my house by their close friends who worked in local massage parlors or strip clubs(West Palm Beach has scores of massage parlors and happy ending places that routinely advertise in the same local papers that have chastised my behavior)[see Palm Beach Post classifieds]. I am and have always been a bachelor. I have used massage parlor women, licensed massage therapists, and women with no massage experience. I have never ever used force, coercion, or in fact had intercourse with any of these women.

When the police investigated me, went through my garbage, searched my house, they found sex toys, but NO cameras or camera equipment; nothing in fact out of the ordinary from many homes of single men. There were never any photos of underage girls. Never. A careful reading of any law enforcement document makes that clear. The camera that was referred to in the search warrant, was the camera installed in my house with the help of the local police to catch my houseman, John Alessi; the same houseman mentioned in many articles. He was breaking into my house and stealing money after being fired. The camera caught him in the act. These cameras were the only cameras at my house; security cameras.

The local state attorney, after conducting an extensive investigation and interviewing the girls herself, a sex crimes prosecutor with over 13 years experience, and who had herself authored the more tough legislations dealing with sex crimes, said in her own words, "There are no real victims here. The girls knew they were going to a house in Palm Beach, they had their boyfriends or family members drive them to the house and wait outside, and then they encouraged their friends to go." Many of the girls interviewed were in their mid twenties, some in their early thirties, and some younger than 18. The girl that the newspapers have referred to as a fourteen year old told the police that she had repeatedly told me that she was 18 and a senior in high school, like many of the massage parlor girls told me, and in her own words to the police, said the reason she said she was 18 was that she was told if she didn't, MR EPSTEIN would not let her in the house. These reports are available.

The state attorney offered me to take a plea to aggravated assault with only probation. My attorneys told me that it would be forever a blight on my record, and I should refuse the deal. I did so. The state attorney, Barry Krisher, took the unusual step of bringing the facts before a state grand jury. In Florida, this happens most often in capital murder cases, not prostitution in someone's own home. To be certain that the public would not criticize the outcome, the state grand jury was given all the evidence and returned a verdict of Solicitation of Prostitution. Solicitation, a non-registrable offense which carries with it a sentence of mandatory probation. Mandatory probation; solicitation is one of the few statues that has such a designation. The local police chief, however, met this charge with great disdain. He believed something untoward had gone on for the grand jury to return such a mild verdict after his department had spent hundreds of thousands of

dollars examining the behavior of a resident that rarely left his house. Women seemed to come and go, women of ALL ages. Some masseuses interviewed were in their sixties, some were men.

The police chief, unhappy with the decision of twelve Florida citizens that weighed the evidence, took the unprecedented step of releasing the raw police reports to the press. The raw sewage of an investigation not corroborated, or as it turns out, not even transcribed from the actual interview tapes correctly. Before a plea to the indictment was entered and the case was still open, he released the reports and then sent a letter off to the parents of some of the girls and to the FBI asking for their assistance. Only two days after the grand jury decided that I should only be charged with solicitation of prostitution, NOT underage women, not pimping, but using prostitutes as a john, I received my first FEDERAL subpoena. What resulted after a thirteen month investigation and can be read in my non prosecution agreement, was the federal government threatened me with a fifty page indictment alleging that I had broken federal law, though all actions took place in my home in Florida, the women were from Florida, and no interstate travel took place. The AUSA said that my secretary had made telephone calls to the women. Many of those calls were return calls, and the use of the telephone by my secretary to confirm massage appointments, was equivalent federally to some guy surfing the internet, knowing full well that the person on the other end of the connection is under age, and trying to coerce them into some illegal sex activity. The internet luring statute says that someone uses the means of interstate commerce, (in my case it was a phone) to knowingly coerce underage persons into sex. This was the first time in history that this statute would be stretched, twisted beyond all recognition in an attempt to threaten prosecution. I had hired Ken Starr, former Solicitor General; Alan Dershowitz, law professor; Roy Black, trial attorney; Joe Whitley, former assistant attorney general; and Guy Lewis former US attorney in South Florida, to defend me against what each one of them had said was no federal crime. Ken Starr wrote a brief using a federalism argument that made it clear that my crime of being a john could not be a federal crime. It was to no avail. What the federal government required was as follows: They required that my defense team, not the feds, but my team, go to the state attorney and ask that he up my charge to a pimping charge; a charge that carried with it sex registration. They would not give him the facts to support that charge, or give me evidence they said they had that I had under Florida law received money FROM these girls to offer them out as prostitutes. Florida law is very clear, that the pimp must have a financial benefit from the crime. It would be our responsibility to ask the state attorney to up my charge and agree to sentence me to 18 months in jail and a year of house arrest. In the history of the state attorneys office, they have no other instance of someone requesting a higher charge than what the grand jury decided and a harsher penalty. In addition, the federal government would require me to pay a minimum of \$50,000 to each woman on a list of women that they would choose. A list that would be kept secret; no names on their list would be disclosed to my attorneys or myself until I was already firmly in a jail cell. A list that we would not only be obliged to pay money to, but if any of the women did not accept the \$50,000, I would be required to pay an attorney, chosen by the government, to represent the women to enable them to sue me; I would have to pay their attorney fees. I would be given the names of the women after being in jail, would not be allowed to appeal this deal, pay women, some of whom I had never even met, and if I chose to fight this deal, I would be threatened over and over with being in breach of my agreement. The attorney chosen

by the government to represent these women hired his own daughter, a sitting state prosecutor, who received special leave to represent these women, and though she continued to receive her state salary, billed me over \$800,000 in a period of one year to represent women suing me. When my side raised objections, we were told that if we fought this, the government would declare a breach of my agreement and indict me. The AUSA actually filed an affidavit with the court that stated that "The protection from the government that Epstein thought he bargained for really is "illusory", we can always bring a case against him for the live span of any woman we think has been a victim."

After serving my sentence, I was sued by many women on the government list. During many of the depositions taken in those cases, the women admitted to the following: they had many other clients, they got paid thousands of dollars a week to work in the local massage parlors and sex clubs, they kept their list of johns in their Bible. Many had abusive boyfriends and abortions way before they ever met me, though they claimed sex assault abuse and various other sex claims. Most later brought their best friends to the house who also claimed the same abuse in the hopes of getting money.

With what the newspapers had called a dream team, each and every lawyer, when they saw the result of the negotiations, said with incredulity, "We have never seen anything like this before". I had never left my house and the women had not traveled on my planes or to another state. I had never made money off of these women. I was a consumer of prostitution, a john. The government said that they could invoke a statute for travel for the purpose of sex, which would be the equivalent to tourists who sign on to fake web sites advertising sex with minors in Cambodia, Thailand and other third world countries. The government said that they could charge me with traveling to Florida to have sex with an underage girl, even though sex with 16 year olds is legal in New Jersey and Pennsylvania and sex with 17 year olds is legal in New York. They suggested that they would indict me for traveling to Florida FOR THE PURPOSE of having sex with minors. Notwithstanding the fact that I had a home in Florida for 15 years, regularly traveled to see my brother, mother and business associates. They said that they thought a novel application could at least get me indicted, unless I took the state plea deal. I had little choice. The crimes they alleged, no matter what the likelihood of success, carried with them a minimum mandatory 10-year sentence. I recognize that I am not a sympathetic figure, and had to decide whether to risk a trial where the jury would see an older man and young women that would be paraded in Sunday school outfits during the trial.

I have shown poor judgment in the past, and have paid a heavy price for those mistakes. I had hoped to move forward with my science philanthropy and helping those less privileged than myself. Then came Scott Rothstein.

Scott Rothstein was the senior partner of RRA . He is currently serving a 50 -year prison sentence for perpetrating the largest fraud in South Florida's history. He decided that sex allegations made against me could be used to fleece hundreds of investors out of hundreds of millions of dollars. He recruited Brad Edwards, a smalltime Ft. Lauderdale attorney who had access to some of the women on the

government list. Rothstein forged judges signatures, hid behind attorney client privilege, secrecy of legal docu, work product, cover letter, giving illegal investigative activity the protection normally reserved for lawyers and their legitimate clients. He falsely told investors that I had settled cases with him for hundreds of millions of dollars, but the women wanted their money right away. If they gave him 30 million dollars now, he could give part of it to the women who wanted to remain anonymous, they would go off into the sunset with their money, and the full payment would be made to the investors. Investors that would be getting 50-100% return on their money for taking advantage of the same women who allegedly had come in contact with me. Bill Schere, an attorney in Broward, has filed 147 complaints against Scott Rothstein and the firm.

The attorney for the women, aware that I would be loathe to involve innocent friends in problems that were strictly of my own making, subpoenaed names and tried to smear any friend or mine whose name appeared in print previously. They contacted Bill Clinton, Donald Trump, David Copperfield, innocent bystanders with no knowledge of any of my actions whatsoever. I settled the cases rather than forcing both the women and others to be subject to a public questioning of their lives.

It appears that the Rothstein firm had continuing help from the government throughout their civil litigation. Emails received as a result of a recent subpoena show descriptions such as, "received info from current FBI agents".

The former Rothstein partners subpoenaed my attorney for all correspondence regarding my plea with the US attorney. Though highly unusual, the government sided with the former Rothstein partners and agreed we needed to produce all the correspondence between the government and my attorneys.

During the civil deposition of my former houseman, Alfredo Rodriguez, attended by a new attorney from the Rothstein firm, whose name appears on the record as CARA Holmes, [also appears as Carolyn Holmes, also appears as Kara Holmes], the houseman allegedly said that he had stolen a book from my house with telephone numbers in it that the government wanted. This was in July of 2009. I believe that the attorneys went to outside counsel Kendall Coffey, and asked whether or not they could buy the book for the \$50,000 that the houseman had asked for it. THREE months later, the FBI and the same AUSA that had headed my prosecution set up my houseman in a sting. It appears that while using a lawyer from the RRA firm, Brad Edwards, as a confidential informant for the government at the same time that Scott Rothstein was using me and the allegations against me to fleece his victims, the US attorneys' office was sitting in the Rothstein offices planning a sting operation, while right next door, Scott Rothstein was making off to Morocco in an attempt to flee the country. Alfredo Rodriguez was prosecuted by the same AUSA and received an 18-month sentence; however, it also appeared that on the very same day of his sting arrest, he bought an illegal gun, and was later sentenced to four years in prison. Who Cara Holmes is, and what her role was in RRA is still a mystery to us. She appears to be a former FBI agent out of the Chicago office. She joined the Rothstein firm in May of 2009, and joined the Florida Bar at the same time. She attended depositions of my pilots and my houseman. She communicated regularly with Brad Edwards and the investigators on my case. The email traffic is extensive.

The telephone book that Alfredo Rodriguez had stolen from my house was then turned over (by the government?) to the same attorneys who had been told they could not buy it as they would have been buying stolen property. Brad Edwards, the former partner of Scott Rothstein, then used the purloined book to send out letters to everyone in the book, asking for additional stories of my wrongdoing in the past five years with the hopes of getting new clients. The letter was structured so as to circumvent the ethical rules regarding trolling for clients.

While I was serving my sentence, my lawyers were able to come see me in jail. Only two months after being incarcerated, my in house lawyer came to see me to tell me that we were now conducting an audit of legal fees paid to date. They had discovered that Gerald Lefcourt, my primary defense attorney, had taken out cash to the tune of \$800,000, that according to his own accountant, he was not entitled to. He had simply prepared invoices that said, "Please pay another \$100,000 or \$200,000". Though he had been asked on multiple occasions to substantiate the bills, his response would be, "We are working full time for you". I pointed out that his was not the only firm working for me, but he replied, "Would you like me to quit?" He eventually returned over \$400,000 over a period of time, as he said that his cash flow could not handle the strain. He said that he was still owed for things like taxi fair, coffee and doughnuts, detailed for \$2.53, and would keep \$400,000.

I was told that I should hire Guy Lewis, a former US Attorney in the Southern District. Lewis, a southern style gentleman; white suits, fast cars; said he had a great relationship with the current US Attorney, Alex Acosta, and the people in Washington that would potentially need to review what ever happened in South Florida. He wanted a \$100,000 per month retainer, and with this, his partner Mike Tein would represent me. Upon review of Lewis' background, it was suggested that he might now not have the credibility that he had represented, and rumors were that he had been asked to leave the Department of Justice for inappropriate billing. I told him in no uncertain terms that if this were true he would need to tell me, as he was representing my credibility with the government. If he had been asked to leave the Department of Justice, it would dramatically hurt my chances if it were he making my case to senior officials. He swore up and down, as southerners are apt to do, that there was no truth whatsoever to the allegations. Being charged with untrue allegations rang close to my heart, and I chose to side with Lewis. Only after my incarceration, when Lewis and Tein came to see me in a 9'x 10' attorney room that smelled of urine, and I told them that I was now being sued by many of the girls on the government list, they expressed their regrets and their willingness to help. However, as they walked out down the dungeon like hall with the sound of clanging gates in the background, they were unaware of the security cameras and microphones throughout the hallway. They chose to high-five one another on camera and smile with the comment, "This is going to be a couple more years of fees". The guards at the jail, accustomed to some of the most heinous physical crimes imaginable, and hardened against most of humanity's foibles, were caught off guard by the exhilaration of the potential of more fees.

Sex for money; it's a sensitive subject. The reactions range from Andrew Dworkin the feminist who considers all intercourse a form of rape; man inserting his authority, to Jackie Mason that posits that when a man takes a woman for dinner, many times his real motivation is the hope of receiving sex at the end of the evening. He suggests it is hypocritical for the man to be able to pay the florist for flowers, the doorman for getting a cab, the restaurant for the food, and the liquor store for the gift of wine, but can't pay the only person that performs the actual sex act without committing a crime. Yes, I paid for sex. I am a john. Yes, I understand that prostitution is a crime and a crime that very few johns have even gone to jail for. I am aware that there are strong feelings amongst many people regarding that crime. Many countries have legalized it, some states have legalized it; many have a policy of no enforcement. New York City has escort services that openly advertise, massage parlors that have neon signs in midtown. In actual fact, the crime of paying for sex at the time of my transgressions was under penal code 230; equivalent to that of jay walking unless the girl was under 15. Yes, under the age of 15. That was in New York. In Florida, the age of consent is 18. Misrepresentation of age is not considered a defense. Even if the girl worked in a sex establishment where one has to prove age to work, if the girl was met in a bar where the drinking age is 21, or shows ID that appears to be valid that she is over 18, that is not a defense. The State Attorneys who deal with this sort of crime on a regular basis reviewed the case brought by the local police, and said in no uncertain terms that there "were no real victims " in the Epstein case. NO real victims. Their words; they said the women knew what they were doing. They even brought their best friends to Epstein's house after going there a number of times themselves. How could there be a serious crime?

The AUSA decided that she would protect the young women of Palm Beach. She saw a need for child safety everywhere she looked. She has been chastised twice by local judges for hiding information from and misleading the court, and had a supervisor represent her in front of a judge that would have disciplined her. Her first subpoena to me asked for all my tax returns, my medical records, my phone book, my plane logs.

The women came to my house. I usually exercised every day followed by a massage. Most of the time, I would be on the telephone when a woman was brought into the room. Many times they rubbed my feet or back. I never spoke to them at all, because I would be on the phone. The room was dimmed, and often I would not even see the woman. If not on the phone, I would talk to the woman. NO intercourse ever occurred; most women testified they never touched my genitals at all. NEVER. These depositions were taken as a result of the government supported civil suits against me.

DECLARATION IN SUPPORT OF PLAINTIFF'S REQUEST FOR PROTECTIVE ORDER

I, Jane Doe, the Plaintiff in this matter proceeding under a pseudonym, state as follows:

1. I am a competent adult over 18 years of age able to testify as to personal knowledge. The facts in this declaration are true and correct to the best of my knowledge, information, and belief, and I am competent to testify to them if called upon to do so.
2. I was subject to extreme sexual and physical abuse by the Defendants, including forcible rape, that took place at several parties of Defendant Epstein during the summer of 1994 in New York City at a residence used by Defendant Epstein. During this period, I was 13 years old.
3. More particularly, I traveled by bus to New York City in June 1994 in the hope of starting a modeling career. I went to several modeling agencies but was told that I needed to put together a modeling portfolio before I would be considered. I then went to the Port Authority in New York City to start to make my way back home. There I met a woman who introduced herself to me as She told me about the parties and said that, if I would join her at the parties, I would be introduced to people who could get me into the modeling profession, also told me I would be paid for attending.
4. The parties were held at a New York City residence that was being used by Defendant Jeffrey Epstein. Each of the parties had other minor females and a number of guests of Mr. Epstein, including Defendant Donald Trump at four of the parties I attended. I understood that both Mr. Trump and Mr. Epstein knew that I was 13 years old.
5. Defendant Trump had sexual contact with me at four different parties in the summer of 1994. On the fourth and final sexual encounter with Defendant Trump, Defendant Trump tied me to a bed, exposed himself to me, and then proceeded to forcibly rape me. During the course of this savage sexual attack, I loudly pleaded with Defendant Trump to stop but he did not. Defendant Trump responded to my pleas by violently striking me in the face with his open hand and screaming that he would do whatever he wanted.
6. Immediately following this rape, Defendant Trump threatened me that, were I ever to reveal any of the details of Defendant Trump's sexual and physical abuse of me, my family and I would be physically harmed if not killed.

7. Defendant Epstein had sexual contact with me at two of the parties that summer. On the second occasion involving Defendant Epstein, Defendant Epstein forced himself upon me and proceeded to rape me anally and vaginally despite my loud pleas to stop. Defendant Epstein then attempted to strike me about the head with his closed fists while he angrily screamed at me that he, Defendant Epstein, should have been the one who took my virginity, not Defendant Trump, before I finally managed to break away from Defendant Epstein.

HOUSE OVERSIGHT 025939

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8. Immediately following this rape, just like Defendant Trump, Defendant Epstein threatened me

not to ever reveal any of the details of Defendant Epstein's sexual and physical abuse of me or else my family and I would be physically harmed if not killed.

9. Both Defendants had let me know that each was a very wealthy, powerful man and indicated

that they had the power, ability and means to carry out their threats. Indeed, Defendant Trump stated

that I shouldn't ever say anything if I didn't want to disappear like , a 12-year-old female that was

forced to be involved in the third incident with Defendant Trump and that I had not seen since that third incident, and that he was capable of having my whole family killed.

10. The duress imposed on me by Defendants not to ever reveal any of the details of the sexual and

physical abuse caused to me by Defendants has not terminated and the fear it has instilled in me has not

subsided. Unfortunately, making matters worse for me, I was subjected to daily painful reminders of

the horrific acts of Defendant Trump via mass media coverage of him starting last summer that, over a

short period of time, became continuous and unavoidable.

11. The duress had prevented me from starting litigation before this year. However, as soon as I

surfaced, I received threats. More specifically, shortly after my first complaint was filed in California on

April 26, 2016, I started receiving threatening phone calls on a cell phone I then owned. The calls were

never for more than 20 seconds or so before they hung up and they were always from a blocked or

unavailable phone number according to my caller ID feature. Since I changed phone numbers, the

threatening calls have completely stopped.

12. This litigation involves matters that are highly sensitive and of a personal nature, and I believe

that identification of me would pose a risk of retaliatory physical harm to me and

to others.

13. I have no reason to believe that the Defendants' threats have ever been lifted or will ever be

lifted and so I request that the Court issue an order protecting me and my family from harm and

harassment by the Defendants.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: June 18, 2016

ne Doe, a pseudonym

HOUSE OVERSIGHT 025940



1 of 1 mentions



BURMAN CRITTON LUTTIER & COLEMAN, LLP

515 N. Flagler Drive

Suite #400

West Palm Beach, FL 33401

From: Jacquie Johnson (mailto:

Sent: Tuesday, August 11, 2009 11:28 AM

To: Jessica Cadwell

Subject: RE: Jane Doe

Please notice the deposition of Ms. Maxwell has been rescheduled from 8/17 to 9/23. A re-Notice

of Taking Deposition

will follow. [REDACTED] deposition is scheduled for August 18, 2009.

From: Jessica Cadwell (mailto:

Sent: Monday, August 10, 2009 3:31 PM

To: Jacquie Johnson

Subject: RE: Jane Doe

No not likely. They just filed an emergency protective order

frJaca eY, Yocla'

Certified Paralegal

Florida Registered Paralegal

BURMAN CRITTON LUTTIER & COLEMAN, LLP

515 N. Flagler Drive

Suite #400

West Palm Beach, FL 33401

From: Jacquie Johnson (mailto:

Sent: Monday, August 10, 2009 3:18 PM

To: Jessica Cadwell

Subject: RE: Jane Doe

Jessica — is the depo of going forward.

From: Jessica Cadwell (mailto:

and/or are domiciled in this district and the events giving rise to the claims occurred in this district.

RAPE, SEXUAL MISCONDUCT, CRIMINAL SEXUAL ACTS, SEXUAL ABUSE, FORCIBLE TOUCHING, ASSAULT, BATTERY, INTENTIONAL AND RECKLESS INFLICTION OF EMOTIONAL DISTRESS, DURESS, AND FALSE IMPRISONMENT

7. Plaintiff was subject to acts of rape, sexual misconduct, criminal sexual acts, sexual abuse, forcible touching, assault, battery, intentional and reckless infliction of emotional distress, duress, false imprisonment, and threats of death and/or serious bodily injury by the Defendants that took place at several parties during the summer months of 1994. The parties were held by Defendant Epstein at a New York City residence that was being used by Defendant Epstein at 9 E. 71st St. in Manhattan. During this period, Plaintiff was a minor of age 13 and was legally incapable under New York law of consenting to sexual intercourse and the other sexual contacts detailed herein. NY Penal L § 130.05(3)(a). The rapes in the first, second, and third degrees; sexual misconduct; criminal sexual acts in the first, second, and third degrees; sexual abuse in the first, second, and third degrees; and forcible touching (and, on information

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and belief, predatory sexual assault) detailed herein are unlawful under New York law, e.g., NY

Penal L § 130.20-130.52, and 130.55-130.65 (and, on information and belief, 130.95) and

constitute the torts of, inter alia, assault, battery, false imprisonment, and intentional or reckless

infliction of emotional distress, including threats of force and serious bodily harm, under New

York law. Declaration of Plaintiff Jane Doe, Exhibit A hereto; Declaration of Tiffany Doe,

Exhibit B hereto. Jane Doe and Tiffany Doe are each pseudonyms as each woman wishes anonymity. Tiffany Doe, a witness, was an employee of Defendant Epstein. Exh. B.

8. Courts have discretion to allow proceeding anonymously where the need for privacy outweighs the public's interest in knowing their identity and any prejudice to the

defendants. Sealed Plaintiff v. Sealed Defendant, 537 F.3d 185, 189 (2d Cir. 2008). This

litigation involves matters that are highly sensitive and of a personal nature, and identification of

Plaintiff would pose a risk of retaliatory physical harm to her and to others. Exh. A. All of the

ten factors that the Second Circuit articulated as relevant to this analysis favor

anonymity,
especially factors 1-4, 7, and 10 (e.g., factors one and two: "whether the litigation involves matters that are 'highly sensitive and [of a] personal nature,'" and "'whether identification poses a risk of retaliatory physical or mental harm to the ... party [seeking to proceed anonymously] or even more critically, to innocent non-parties'").), or are neutral with respect to anonymity.

Protecting Plaintiff's anonymity is also appropriate as she is a rape victim.

9. Plaintiff was enticed by promises of money and a modeling career to attend a series of parties, with other similarly situated minor females, held at a New York City residence

that was being used by Defendant Jeffrey Epstein. At least four of the parties were attended by

Defendant Trump. Exhs. A and B. On information and belief, by this time in 1994, Defendant

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Trump had known Defendant Epstein for seven years (New York, 10/28/02), and knew that

Plaintiff was then just 13 years old. Exhs. A and B.

10. Defendant Trump initiated sexual contact with Plaintiff at four different parties.

On the fourth and final sexual encounter with Defendant Trump, Defendant Trump tied Plaintiff

to a bed, exposed himself to Plaintiff, and then proceeded to forcibly rape Plaintiff. During the

course of this savage sexual attack, Plaintiff loudly pleaded with Defendant Trump to stop but

with no effect. Defendant Trump responded to Plaintiff's pleas by violently striking Plaintiff in

the face with his open hand and screaming that he would do whatever he wanted. Exhs. A and

B.

11. Immediately following this rape, Defendant Trump threatened Plaintiff that, were she ever to reveal any of the details of the sexual and physical abuse of her by Defendant Trump,

Plaintiff and her family would be physically harmed if not killed. Exhs. A and B.

12. Defendant Epstein had sexual contact with Plaintiff at two of the parties. The second sexual encounter with Defendant Epstein took place after Plaintiff had been raped by

Defendant Trump. Defendant Epstein forced himself upon Plaintiff and proceeded to rape her

anally and vaginally despite her loud pleas to stop. Defendant Epstein then attempted to strike

Plaintiff about the head with his closed fists while he angrily screamed at Plaintiff that he,

Defendant Epstein, rather than Defendant Trump, should have been the one who took Plaintiff's

virginity, before Plaintiff finally managed to break away from Defendant Epstein.
Exhs. A and

B.

13. The threats of violence against Plaintiff and her family continued, this time from

Defendant Epstein, who again reiterated that Plaintiff was not to reveal any of the details of his

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sexual and physical abuse of her or else, specifically, Plaintiff and her family would be seriously

physically harmed, if not killed. Exhs. A and B.

14. While still under threats of physical harm by coming forward and having no reason to believe that the threats have ever been lifted or would ever be lifted, Plaintiff, who has

suffered from stress, emotional distress, mental pain and suffering, among other problems, ever

since the assaults, was subjected to daily painful reminders of the horrific acts of one of the

perpetrators, Defendant Trump, via mass media coverage of him starting on or about June 16,

2015 that, over a short period of time, became continuous and unavoidable. Exh. A.

15. As a direct and proximate result of the sexual assaults and rapes perpetrated by Defendants upon her, Plaintiff has suffered stress, emotional distress, and mental pain and

suffering, as well as adverse physical consequences.

16. As a direct and proximate result of the sexual assaults and rapes perpetrated by Defendants upon her, Plaintiff has suffered physical pain and suffering.

17. As a direct and proximate result of the sexual assaults and rapes perpetrated by Defendants upon her, Plaintiff has been subjected to public scorn, hatred, and ridicule and has

suffered threats against her life and physical safety.

18. As a direct and proximate result of the sexual assaults and rapes perpetrated by Defendants upon her, Plaintiff has incurred special damages, including medical and legal

expenses.

19. The sexual assaults and rapes perpetrated by Defendants upon Plaintiff were intentional acts.

20. The conduct of Defendants demonstrates willful, reckless and intentional conduct that raises a conscious indifference to consequences.

5

Case 1:16-cv-04642 Document 1 Filed 06/20/16 Page 6 of 9

21. At the appropriate time in this litigation, Plaintiff shall amend her complaint to

assert a claim for punitive damages against Defendants in order to punish Defendants for their

actions and to deter Defendants from repeating their conduct.

TOLLING OF STATUTE OF LIMITATIONS

22. Any statute of limitations applicable to rape, sexual misconduct, criminal sexual

acts, sexual abuse, forcible touching, assault, battery, intentional and reckless infliction of emotional distress, false imprisonment of a minor, if any, is tolled owing to the continuous and active duress imposed upon Plaintiff by Defendants that effectively robbed Plaintiff of her free will to commence legal action until the present time. Cullen v. Margiotta, 811 F.2d 698, 722 (2nd Cir.1987); Ross v. United States, 574 F. Supp. 536, 542 (S.D.N.Y. 1983). More particularly, Plaintiff was unrelentingly threatened by each Defendant that, were she ever to reveal any of the details of the sexual and physical abuse caused to her by Defendants, Plaintiff and her family would be physically harmed if not killed. The duress has not terminated and the fear has not subsided. The duress is an element of or inherent in the underlying causes of action complained of herein. The duress and coercion exerted by Defendants has been such as to have actually deprived Plaintiff of her freedom of will to institute suit earlier in time, and it rose to such a level that a person of reasonable firmness in Plaintiff's situation would have been unable to resist. Exhs. A and B.

23. Both Defendants let Plaintiff know that each was a very wealthy, powerful man and indicated that they had the power, ability and means to carry out their threats. Indeed, Defendant Trump stated that Plaintiff shouldn't ever say anything if she didn't want to disappear like Maria, a 12-year-old female that was forced to be involved in the third incident with

6

Case 1:16-cv-04642 Document 1 Filed 06/20/16 Page 7 of 9

Defendant Trump and that Plaintiff had not seen since that third incident, and that he was

capable of having her whole family killed. Exhs. A and B.

24. The duress had prevented Plaintiff from starting litigation before this year. However, as soon as she surfaced, she received threats. More specifically, shortly after her first

complaint was filed in California on April 26, 2016, she started receiving threatening phone calls

on her cell phone. Exh. A.

25. Defendants are equitably estopped from arguing that any statute of limitations has

not been tolled as Defendants wrongfully forced Plaintiff to refrain from timely commencing this

action by threats, duress, and other misconduct. Exhs. A and B.

26. Moreover, this action has been brought before the facts giving rise to the estoppel

have ceased to be operational (i.e., while still under threats of physical harm by

coming forward
and having no reason to believe that the threats have ever been lifted or would ever
be lifted) and
since Plaintiff has decided to seek redress at this time, Plaintiff seeks an order
of protection in
favor of Plaintiff and all associated with her so as to protect them from harm and
harassment
from Defendants and their agents and associates. Exh. A.

DEFAMATION

27. On information and belief, on or about April 28, 2016, Defendant Trump
provided the following statement to American Media, Inc. and/or Radar Online LLC for
publication on at least their website RadarOnline.com regarding Plaintiff's
complaint ED CV 16-

797-DMG (KSx) filed in the United States District Court for the Central District of
California:

"The allegations are not only categorically false, but disgusting at the highest
level and clearly

7

Case 1:16-cv-04642 Document 1 Filed 06/20/16 Page 8 of 9

framed to solicit media attention or, perhaps, are simply politically motivated.

There is

absolutely no merit to these allegations. Period." The statement provided for
publication by

Defendant Trump was published by said website and has been republished elsewhere in
whole or

in part numerous times (and similar statements of an attorney for Defendant Trump
were also

published). The statement provided for publication by Defendant Trump and that was
published

by said websites is false as it pertains to Plaintiff.

28. The published statement is libelous on its face, and clearly exposes Plaintiff
to

hatred, contempt, ridicule and obloquy.

29. As a proximate result of the above-described publication, Plaintiff has suffered
loss of her reputation, shame, mortification, and injury to her feelings, all to her
damage in an

amount to be established by proof at trial.

30. The above-described publication was not privileged because it was published by
Defendant Trump with malice, hatred and ill will toward Plaintiff and the desire to
injure her.

31. As a direct and proximate result of Defendant Trump's defamation of Plaintiff,
Plaintiff has been subjected to public scorn, hatred, and ridicule and has suffered
other injury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants and for the
following relief:

A. That judgment be entered against Defendants for special damages, compensatory
damages, and punitive damages in an amount which shall be shown to be reasonable and
just by

the evidence and in excess of Seventy Five Thousand Dollars (\$75,000.00), exclusive

of interests
and costs;

8

Case 1:16-cv-04642 Document 1 Filed 06/20/16 Page 9 of 9

B. That all costs of this action be assessed against Defendants, including all reasonable attorney's fees, costs and expenses of this action;

C. That an order of protection in favor of Plaintiff and all associated with her be issued so as to protect them from harm and harassment from Defendants and their agents and associates; and

D. Such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff demands a trial by jury of all issues properly triable by jury in this action.

Respectfully submitted,

Dated: June 20, 2016

By: /s/ Thomas Francis Meagher

Thomas Francis Meagher

SDNY Bar Code TM6707

One Palmer Square

Princeton, New Jersey 08542

Telephone: (609) 558-1500

tmeagher@thomasfmeagheresq.com

ATTORNEY FOR PLAINTIFF

9

From: J [jeevacation@gmail.com]

Sent: 2/1/2019 7:20:44 PM

To: Michael Wolff

"That Russian oligarch who spent that money on that property and never moved into it and ultimately tore it

down, he's also a large shareholder in a bank called the Bank of Cyprus, which has been implicated in Russian

money laundering. The chairman of the Bank of Cyprus is the former CEO of Deutsche Bank, to which Donald

Trump owed all that money at the time he conveniently got this very large influx of cash from a Russian guy.

The vice chairman of that bank until recently was our new secretary of commerce, long time Trump friend,

Wilbur Ross.

please note

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HOUSE OVERSIGHT 031681

From: J [jeevacation@gmail.com]

Sent: 5/30/2019 9:34:38 PM

To: Michael Wolff

Subject: Re:

maybe as a favor to trump. in exchange for yemen and iran support. . smells doesnt it?

On Thu, May 30, 2019 at 5:33 PM Michael Wolff wrote:

So MBS was paying him off? Why? Ideas?

On Thu, May 30, 2019 at 5:29 PM J <jeevacation@gmail.com> wrote:

is it a coincidence that the russian that bought the house in palm beach and knows all , is the same guy that

sold a painting last year to mbs for 450 million dollars. that was only worth 1. 5m?

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HOUSE OVERSIGHT 031683

From: J [jeevacation@gmail.com]
Sent: 2/1/2019 10:18:49 AM
To: Michael Wolff
Subject: Fwd:
have fun

-----Forwarded message-----

From: J <jeevacation@gmail.com>
Date: Fri, Feb 1, 2019 at 5:18 AM
Subject:

To: jeffrey epstein <jeevacation@gmail.com>

prostitution is a state crime, never before a man in his own house charged with soliciting. ! in Florida first

offenders are required to take a sex ed class and get pre trial diversion, no criminal record. . .

there is a

felony solicitation for the THIRD offense. . A grand jury was held and they found me guilty of one count of

felony solicitation. because there were many girls. . mandatory diversion. sentence. !!!! a grand jury

. usually only for capital murder cases. . Recarey and Reiter (police chief). pulled my garbage for months,

and surveilled the house . letting all the girls come and go ? ! called in the FBI. they did not like the grand

jury result. and released to the press, the raw sewage of police interviews , ie, no girl was cross examined

EVER. . Unheard of . - the girls returned the house multiple times. for 200 dollars for a rub and tug. . no sex. . some worked in the local massage parlors, most in their mid twenties.. There is only

press stories told my strippers of me buying my girlfriend from slovakia from her parents . girls under

15. . all made up to get press. . FBI / puts a task force together title" operation leap year" to investigate

my personal massage activity ?! nuts. interviews my chiropractor ? medical info. . etc.

worked at Mara Lago. Trump knew of it. and came to my house many times during that

period. The testimony of the houseman John allessi confirmed it. He never got a massage.

abe gosman a friend of mine. ran into financial difficulty with assisted living homes. . His home was listed

at 45 million dollars. with no takers for months on end . He and I agreed a price of 30m. (His wife

ends up going to jail for lying to the bankruptcy trustee about her jewelry.) this is in the summer of 04. . I

became the stalking horse bidder at 36 m. ie if someone bid higher I would receive a fee.

trump buys the house at the telephone auction. only me trump and his friend pulty the developer.

He quickly puts it on the market for 125 million, serves the purpose of a justification for a high sale later

. . and no one will touch it. it is bought

Three years later 08 he sells it to Rybolooev for approx 100 million. He should have had a 50 million plus capital gain. he tells people and press he spent 20-30 m to fix up. that would justify a reduction in capital gains, key question how did he report the sale , if he did at all on his 08 tax return.

He has no money. when he buys the house. His biz model is putting his name on a real estate development and gets a fee for using his name. The hotel biz is just that. someone else buys the hotel. hoping to make a profit from its operation and eventual sale. Trump put his name on it, and get a 2 % fee and maybe a piece of the profit if any on sale. He touts the project as " his " . just as in his current financial statements on file as president he lists his " income " as the GROSS receipts of the clubs, with no expenses deducted. not his personal revenue. ie the doral golf club loses money every year. it pays out more than it takes in , but he lists the revenue as his income. AMAZING.

HOUSE OVERSIGHT 023044

"Trump's relationship with Deutsche Bank has not always been amicable; in November 2008, he had difficulty making payments on a \$640 million Deutsch Bank loan — \$40 million of which he guaranteed personally — he took out to finance the construction of the Trump tower in Chicago." <https://thescowproject.org/collusion/trump-sues-deutsche-bank-3-billion/> in july , miraculously , rybolooev ve buys the house for roughly the same" 40 plus million dollar" profit"

https://www.washingtonpost.com/news/worldviews/wp/2017/08/24/the-russian-diplomat-found-dead-in-his-pool-in-sudan-is-the-seventh-to-die-since-november/?utm_term=.77b0a287fb11

Joe Recarey dies in june of 18. same m.o. ?

please note

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HOUSE OVERSIGHT 023045

From: J [jeevacation@gmail.com]
Sent: 2/1/2019 10:18:49 AM
To: Michael Wolff
Subject: Fwd:
have fun

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From: J <jeevacation@gmail.com>
Date: Fri, Feb 1, 2019 at 5:18 AM
Subject:

To: jeffrey epstein <jeevacation@gmail.com>
prostitution is a state crime, never before a man in his own house charged with soliciting. ! in Florida first offenders are required to take a sex ed class and get pre trial diversion, no criminal record. . . there is a felony solication for the THIRD offense. . A grand jury was held and they found me guilty of one count of felony solitciation. because there were many girls. . mandatory diversion. sentence. !!!! a grand jury . ususally only for capital murder cases. . Recarey and Reiter (police chief). pulled my garbage for months, and surveilled the house . letting all the gilrs come and go ? ! called in the FBI. they did not like the grand jury result. and released to the press, the raw sewage of police interviews , ie, no girl was cross examined EVER. . Unheard of . - the girls retunred the house multiplie times. for 200 dollars for a rub and tug. . no sex. . some worked in the locak massage parlors, most in thier mid twenties.. There is only press stories told my strippers of me buying my girlfiedn from slovakia from her parents . girls under 15. . all made up to get press. . FBI / puts a task force together title" operation leap year" to investigate my personal massage activity ?! nuts. interviews my chiropractor ? medical info. . etc.
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<https://themoscowproject.org/collusion/trump-sues-deutsche-bank-3-billion/>

in july , miraculously , rybollolev ve buys the house for roughly the same" 40 plus million dollar" profit"
https://www.washingtonpost.com/news/worldviews/wp/2017/08/24/the-russian-diplomat-found-dead-in-his-pool-in-sudan-is-the-seventh-to-die-since-november/?utm_term=.77b0a287fb11
Joe Recarey dies in june of 18. same m.o. ?
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OCEAN BLVD PALM BEACH FL 33480 5004 86,250.00 0.1894 VACANT
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M	50-43-43-27				76050	0	76050			
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C	50-43-43-27				127801	0	127801			

IN THE CIRCUIT COURT OF THE FIFTEENTH
JUDICIAL CIRCUIT, IN AND FOR PALM
BEACH COUNTY, FLORIDA
JEFFREY EPSTEIN,
CASE NO.: 502009CA040800XXXXMBAG
Plaintiff,

vs.

SCOTT ROTHSTEIN, individually, BRADLEY J.
EDWARDS, individually, and L.M., individually,
Defendant,

DEFENDANT/COUNTER-PLAINTIFF'S RESPONSE IN OPPOSITION TO
PLAINTIFF/COUNTER-DEFENDANT'S MOTION FOR SUMMARY JUDGMENT ON
DEFENDANT/COUNTER-PLAINTIFF'S FOURTH AMENDED COUNTERCLAIM

Defendant/Counter-Plaintiff Bradley J. Edwards, by and through his undersigned
counsel, hereby
submits this Response in Opposition to Plaintiff/Counter-Defendant Jeffrey Epstein's
Motion for

Summary Judgment. Epstein seeks Summary Judgment on the claims of abuse of process
and malicious

prosecution set forth in Brad Edwards' Fourth Amended Counterclaim. Each of the
grounds asserted in
support of Epstein's Motion for Summary Judgment are without merit and must be
denied.

In Epstein's Amended Complaint he carries forth the essence of all claims asserted
in his original

Complaint. In that pleading Epstein essentially alleges that Edwards joined
Rothstein in the abusive

prosecution of sexual assault cases against Epstein to "pump" the cases to Ponzi
scheme investors. The
purported "proof" of the allegations against Edwards, as referenced in the Second
Amended Complaint

and in Epstein's Motion for Summary Judgment, includes Edwards' alleged contacts
with the media, his

attempts to obtain discovery from high profile persons with whom Epstein socialized,
press reports of

Rothstein's known illegal activities, the use of "ridiculously inflammatory"
language and arguments in

court. But as the evidence submitted in opposition to Epstein's Motion for Summary
Judgment reflects,

Epstein filed his claims and continued to pursue claims despite his knowledge that
his claims could never

be successful because they were both false and unsupported by any reasonable belief
of suspicion that

Case No.: 502009 CA040800XXXXIVIBAG

Edwards' Opposition to Epstein's Motion for Summary Judgment

Page 2 of 15

they were true. Epstein knew that he had in fact molested each of the minors
represented by Brad

Edwards. He also knew that each litigation decision by Brad Edwards was grounded in
proper litigation

judgment about the need to pursue effective discovery against Epstein, particularly in the face of Epstein's stonewalling tactics. Epstein also knew that he suffered no legally cognizable injury proximately caused by the falsely alleged wrongdoing on the part of Edwards. Moreover, Epstein had no intention of waiving his Fifth Amendment privilege against self-incrimination in order to avoid providing relevant and material discovery that Epstein would need in the course of prosecuting his claims and to which Edwards was entitled in defending those claims. Epstein knew that his prosecution of his claims would be barred by the sword-shield doctrine. Most significantly, the evidence submitted in the supporting papers would compel a fact finder to determine that Epstein had no basis in law or in fact to pursue his claims against Edwards and that Epstein was motivated by a single ulterior motive to attempt to intimidate Edwards and his clients and others into abandoning or settling their legitimate claims for less than their just and reasonable value. The evidence demonstrates that Epstein did not file these claims for the purpose of collecting money damages since he knew that he never suffered any damage as a consequence of any alleged wrongdoing by Edwards but filed the claim to require Edwards to expend time, energy and resources on his own defense, to embarrass Edwards and impugn his integrity and deter others with legitimate claims against Epstein from pursuing those claims. Indeed, the evidence demonstrates that Epstein continued to pursue his claims by filing the Second Amended Complaint alleging abuse of process against Edwards even after he had paid significant sums in settlement of the claims instituted by Mr. Edwards' clients against Mr. Epstein! The evidence marshalled in support of these assertions is set forth in the previously filed documents in this Court. Those documents include Exhibit "A" – Edwards' Statement of Undisputed Facts; Exhibit "B" – Edwards' Renewed Motion for Summary Judgment; Exhibit "C" – Edwards' October 19, 2012 Second Renewed Motion for Leave to Assert Claim for Punitive Damages; Exhibit "D" – Edwards' Notice of Filing of Transcript of Telephone Interview of Virginia Roberts in Support of Motion for Leave to Amended to Assert Punitive Damages; Exhibit "E" – Transcript of Deposition of Jeffrey Epstein dated January 25, 2012; Exhibit "F" – Deposition of Bradley Edwards dated March 23, 2010; Exhibit "G" – Deposition of Scott Rothstein dated June 14, 2012; Exhibit "H" – Order of

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The record reflects that on the eve of the hearing of Edwards' Motion for Summary Judgment

directed to the Second Amended Complaint and in light of the compelling evidence of the lack of any

wrongdoing on the part of Mr. Edwards, the sole remaining abuse of process claim was dismissed by

Epstein.

As discussed, *infra* each of the grounds asserted by Epstein in this Motion for Summary

Judgment must be rejected. The litigation privilege does not serve as a bar to the prosecution of Edwards'

claims against Epstein. Moreover, the evidence submitted by Edwards supports each of the elements of

the claims asserted by Edwards against Epstein which are identified in Epstein's Motion.

Response to Epstein's Statement of Undisputed Facts

The evidence marshalled by Edwards in support of his claims against Epstein which are

referenced in footnote 1 mandates the conclusion that, at a minimum, disputed facts exist with respect to

the elements of each claim addressed by Epstein in his Motion. The facts presented in the various papers

would allow the jury to make a determination that Epstein knew that Brad Edwards properly exercised his

legitimate judgment regarding the need to pursue proper and effective discovery against him to support

the claims which Epstein knew were legitimate. That evidence, referenced herein, further demonstrated

that Epstein filed his claims without probable cause and further that there was a bonafide termination in

favor of Edwards. That evidence further demonstrates that the elements of the claim of abusive process

have been established.

The following additional comments are directed at some of the key purported "undisputed"

material facts asserted by Epstein, especially those referenced in his Memorandum of Law. Also set forth

are key evidentiary matters which undermine Epstein's contentions and which support the proposition

that material issues of fact exist which compel the denial of the Motion for Summary Judgment.

Judge Crow dated March 29, 2012; Exhibit "I" – Deposition of Bradley Edwards dated October 10, 2013; Exhibit

"J" – Deposition of Bradley Edwards dated May 15, 2013.

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None of the public materials identified by Epstein in his Motion make reference to

any

wrongdoing by Brad Edwards. Rather, Epstein seeks to pyramid one impermissible inference upon

another from his citation to these materials to support his otherwise unsubstantiated and non-verifiable

conclusion that he had sufficient evidence to proceed with claims of wrongdoing against Edwards. In

truth, as reflected in Edwards' deposition and his supplemental affidavit, he has no involvement in any

fraud perpetrated by Rothstein (Edwards' deposition of March 23, 2010 at 301-302; Edwards Affidavit

attached to Statement of Undisputed Facts as Exhibit "N" at paragraphs 8-10, paragraph 20, paragraphs

22-23; Exhibit "H" – Deposition of Scott Rothstein at pp. 62-63, 114, and 121-124).

Therefore, any

allegations relating to Rothstein's activities simply have no bearing on the legitimacy of any of the claims

against Edwards.

Edwards could not have possibly "pumped" cases to investors when he never participated in any communications with investors. Rather, Edwards had a duty to his clients to zealously

pursue discovery to achieve a maximum recovery against Epstein. Edwards cannot be liable for taking

appropriate action that his ethical duties as an attorney required. The evidence also reflects that Edwards

filed all three of his cases almost a year before he was hired by RRA or even knew Scott Rothstein

(Edwards' Affidavit, Exhibit "N" attached to Statement of Undisputed Facts). The language set forth in

his Complaints remain virtually unchanged from the first filing in 2008 and, as the evidence shows, the

claims asserted against Epstein from the outset were true.

The citation to public documents is a

convenient ruse; Epstein was not only liable for the molestation of the clients of Brad Edwards, he was

also a serial molester of minors – even as young as twelve years of age

(Exhibit "A" – Edwards'

Statement of Undisputed Material Facts paragraphs 1-43; Exhibit "D" – Statement of Virginia Roberts pp.

16-17). Epstein entered a plea of guilty to felony charges involving prostitution and the solicitation of a

minor for the purposes of prostitution (Exhibit "E" – Deposition of Jeffrey Epstein, March 17, 2010, pp.

101-103). Epstein also entered into an agreement with the United States Attorney's Office

acknowledging that approximately 34 other young girls could receive payments from him under the

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Federal Statute providing for compensation to victims of child abuse..

(Exhibit "N" - Edwards'

Statement of Undisputed Material Facts, paragraphs 41-43).

On July 6, 2010 Epstein ultimately paid to settle all three of the cases Edwards had filed against

him (Exhibit "N" - Edwards' Statement of Undisputed Material Facts, paragraphs 84-85). At Epstein's

request, the terms of the settlement were kept confidential. The sum that he paid to settle all these cases

in therefore not filed with this pleading and will be provided to the court for in camera review. Epstein

chose to make this payment as a result of a Federal Court ordered mediation process which he himself

sought. Epstein entered into the settlements in July 2010 more than seven months after he filed his

lawsuit against Edwards and before he filed his Second Amended Complaint alleging abuse of process on

August 22, 2011.

Further, Epstein could not have been the victim of any scheme to pump the cases against him

because he never paid to settle the cases until well after Edwards had left RRA and severed all connection

with Rothstein in December 2009 (Edwards' Affidavit attached to Statement of Undisputed Facts as

Exhibit "N," paragraph 20). Moreover, Epstein could not have suffered any damage as a result of the

perpetration of the Ponzi scheme by Rothstein because he was not an investor in the scheme.

Perhaps the most significant evidence presented in opposition to Epstein's Motion for Summary

Judgment is the telephone interview of Virginia Roberts submitted in Support of Edwards' Motion for

Punitive Damages (Exhibit "D"). In addition to the specious claims against Edwards relating to his

alleged involvement in a Ponzi scheme, Epstein, in asserting his claims, primarily relied upon the pursuit

by Edwards of testimony from his close friends and associates (See Second Amended Complaint,

paragraph 32, pp. 11-13). Reliance on these assertions is also threaded through Epstein's Motion for

Summary Judgment in his citation to the public documents referencing the pursuit of such discovery. But

as set forth in detail in Edwards' Motion for Final Summary Judgment (Exhibit "B") at pages 14-16, that

discovery was entirely appropriate and Epstein knew it. Specifically, as reflected in the statement of

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Edwards' Opposition to Epstein's Motion for Summary Judgment

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undisputed facts submitted by Mr. Edwards in support of his Motion for Summary

Judgment, Edwards

had a sound legal basis for believing that Donald Trump, Allen Dershowitz, Bill Clinton, Tommy

Mattola, David Copperfield and Governor Bill Richardson had relevant and discoverable information

(Exhibit "A" – Edwards' Statement of Undisputed Facts, paragraphs 69-81). That belief was reinforced

by the testimony of Virginia Roberts (Exhibit "D" pp. 10-17, 21-23). Epstein's assertion of impropriety

in the pursuit of this discovery clearly evidences his bad faith attempts to attribute wrongdoing to

Edwards when he knew, in fact, that the pursuit of that discovery was entirely appropriate under the circumstances of this case.

Finally, any attempt by Epstein to rely upon what he claims are undisputed facts to support his

Motion for Summary Judgment are undermined by his refusal to provide any testimony on the key issues

and evidence which would demonstrate the validity and strength of each of the claims brought against

him by Brad Edwards. Epstein's depositions of March 17, 2010 and January 25, 2012 were replete with

refusals of Epstein to testify based upon his Fifth Amendment privilege. Questions that Epstein refused

to answer in his depositions and the reasonable inferences that a fact finder would draw and which would

otherwise bear on the arguments submitted by Epstein in support of his Motion for Summary Judgment

are as follows:

- Question not answered: "I want to know whether you have any knowledge of evidence that Bradley Edwards personally ever participated in devising a plan through which were

sold purported confidential assignments of a structured payout settlement?"

Reasonable

inference: No knowledge that Brad Edwards ever participated in the Ponzi scheme.

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Question not answered: "Specifically what are the allegations against you which you contend Mr. Edwards ginned up?" Reasonable inference: No allegations against Epstein were ginned up.

Question not answered: "Well, which of Mr. Edwards' cases do you contend were fabricated?" Reasonable inference: No cases filed by Edwards against Epstein were fabricated.

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- Question not answered: "Did sexual assaults ever take place on a private airplane on

which you were a passenger?" Reasonable inference: Epstein was on a private airplane while sexual assaults were taking place.

• Question not answered: "How many minors have you procured for prostitution?"

Reasonable inference: Epstein has procured multiple minors for prostitution.

• Question not answered: "Is there anything in L.M.'s Complaint that was filed against

you in September of 2008 which you contend to be false?" Reasonable inference:

Nothing in L.M.'s complaint filed in September of 2008 was false – i.e., as alleged in

L.M.'s complaint, Epstein repeatedly sexually assaulted her while she was a minor and

she was entitled to substantial compensatory and punitive damages as a result.

• Question not answered: "I would like to know whether you ever had any physical contact with the person referred to as Jane Doe in that [federal] complaint?"

Reasonable

inference: Epstein had physical contact with minor Jane Doe as alleged in her federal

complaint.

• Question not answered: "Did you ever have any physical contact with E.W.?"

Reasonable inference: Epstein had physical contact with minor E.W. as alleged in her complaint.

• Question not answered: "What is the actual value that you contend the claim of E.W.

against you has?" Reasonable inference: E.W.'s claim against Epstein had substantial actual value.

(See Exhibit "A" – Edwards' Statement of Undisputed Material Facts, paragraphs 93-120

for page references.)

A jury could conclude, therefore, from the adverse inferences drawn against Epstein that he was

liable for the claims brought by Brad Edwards and that he had no basis for the pursuit of his efforts to

intimidate and extort Edwards and his clients in the pursuit of those claims.

The Litigation Privilege Does Not Bar the Claims of Abuse of Process and Malicious Prosecution

Epstein contends he is entitled to absolute immunity pursuant to the litigation privilege as to both

claims asserted by Edwards because all actions taken by him occurred during the litigation of his abuse of

process claim against Edwards. For support, he relies primarily on the decision of Wolfe v. Foreman,

2013 WL 3724763 (Fla. 3d DCA July 17, 2013), wherein the Third District found that the litigation

privilege barred both an abuse of process claim and a malicious prosecution cause of action. Wolfe is still

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on rehearing and, thus, is not a final opinion. As a result, it is not binding, nor persuasive. Moreover,

Wolfe undercuts the long-standing recognition of the viability of a claim for malicious prosecution in its

own District and other Florida state and federal courts. See, *SCI Funeral Svs. of Fla., Inc. v. Henry*, 839 So. 2d 702, n.4 (Fla. 3d DCA 2002) ("As the Levin court cited *Wright v. Yurko*, 446 So. 2d 1162, 1165 (Fla. 5th DCA, 1984), with approval, presumably the cause of action for malicious prosecution continues to exist and would not be barred by the litigation privilege."); *Boca Investors Group, Inc. v. Potash*, 835 So. 2d 273, 275 (Fla. 3d DCA 2002) (Cope, J., concurring) (litigation privilege would not be a bar to a malicious prosecution action); *North Star Capital Acquisitions, LLC v. Krig*, 611 Fed. Supp. 2d 1324 (M.D. Fla. 2009) ("However, not every event bearing any relation to litigation is protected by the privileged because,... "if the litigation privilege applied to all actions preliminary to or during judicial proceedings, an abuse of process claim would never exist, nor would a claim for malicious prosecution"); *Cruz v. Angelides*, 574 So. 2d 278 (Fla. 3d DCA 1991)("the law is well settled that a witness in a judicial proceeding,... is absolutely immune from any civil liability, save perhaps malicious prosecution, for testimony or other sworn statements which he or she gives in the course of the subject proceeding."); *Johnson v. Libow*, 2012 WL 4068409 (Fla. 15th Jud. Cir. March 1, 2012)(the purpose of the litigation privilege does not preclude the tort of malicious prosecution). In *Wright v. Yurko* supra, the Fifth District Court of Appeal rejected the application of the litigation privilege to a malicious prosecution action brought by a physician against his patients and an expert after he successfully defended a malpractice claim. Also of significance is the Second District's opinion in *Olson v. Johnson*, 961 So. 2d 351 (Fla. 2d DCA 2007). In that case, the court observed that the litigation (or judicial) privilege would not apply to bar a malicious prosecution action which arose as a result of a false accusation of criminal liability where the prosecution was based, in part, on the testimony of the defendants in the criminal case. The court ruled that the privilege (either absolute or qualified) Case No.: 502009CA040800XXXXMBAG Edwards' Opposition to Epstein's Motion for Summary Judgment Page 9 of 15 which might otherwise apply to a defamation claim for statements made during the course of a judicial proceeding did not bar a malicious prosecution claim. In light of the implicit recognition by the Supreme Court in *Levin* that a claim of malicious prosecution is not barred by the litigation privilege – an implicit recognition

acknowledged by the Third District itself – Epstein's reliance on Wolfe is misplaced. Wolfe is also factually distinguishable from Edwards' claims against Epstein. Wolfe involved a malicious prosecution action against attorneys. Separate policy considerations might serve to impose additional limitations on the assertion of malicious prosecution claims against attorneys – against whom alternative remedies exist such as bar disciplinary proceedings. See *Taylor v. McNichols*, 243 P.2d 642 (Idaho 2010). Moreover, in light of the decisions in *Wright v. Yurko*, supra and *Olson v. Johnson*, supra, the weight of authority supports the proposition that the litigation privilege would not apply to malicious prosecution claims. Both the Third and Fourth Districts have applied the litigation privilege to abuse of process claims. However, Wolfe itself, and the decisions of the Third and Fourth Districts cited in Wolfe, involved the litigation privilege as applied to claims of abuse of process by attorneys. None of the cases involved the extraordinary actions of an individual party like Epstein who carried out a course of action against Plaintiffs counsel with a singular purpose unrelated to any legitimate judicial goal. Under the compelling facts of this case, where the actions of Epstein are coupled with the elements of malice and absence of probable cause arising from the unfounded filing of the claims against Edwards, the litigation privilege should not have any applicability to the abuse of process claim asserted by Edwards.

There are Disputed Issues of Fact Precluding Summary Judgment on the Abuse of Process Claim

An abuse of process claim requires pleading and proof of the following three elements: 1) that the defendant made an illegal, improper or perverted use of process; 2) that the defendant had ulterior motives or purposes in exercising such illegal, improper, or perverted use of process; and 3) that, as a result of such action on the part of the defendant, the plaintiff suffered damage." See *S&I Invs. v. Payless*

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Flea Mkt., 36 So. 3d 909, 917 (Fla. 4th DCA 2010)(citation omitted). The case law is clear that on an abuse of process claim a "plaintiff must prove that the process was used for an immediate purpose other than that for which it was designed." *Id.* (citation omitted). Where the actions taken by a party in a particular lawsuit are designed to coerce another into taking some collateral action

not properly involved

in the proceeding a claim of abuse of process is stated. Miami Herald Publishing Company v. Ferre, 8636 F. Supp. 970 (S.D. Fla. 1985).

In a case for abuse of process, the question of whether the plaintiff's case satisfies the requisite elements is largely a question for a jury. See Patrick John McGinley, 21 Fla. Prac., Elements of an Action § 50:1 (2013-2014 ed.)(citing Gatto v. Publix Supermarket, 111C. 387 So. 2d 377 (Fla. 3d DCA 1980)).

The usual case of abuse of process involves some form of extortion. Scozari v. Barone, 546 So.

2d 750, 751(Fla. 3d DCA 1989) (citing Bothmann v. Harrington, 458 So. 2d 1163, 1169 (Fla. 3d DCA

1984)). That is exactly what has transpired here. Epstein employed the extraordinary financial resources at

his disposal to intimidate his molestation victims and Edwards into abandoning their legitimate claims or

resolving those claims for substantially less than their just and reasonable value.

Consequently, since

Epstein's sole purpose and ulterior motive for filing the complaint without probable cause was in an effort

to extort, to wit: to force his molestation victims and Edwards to settle for minimal amounts, that filing

and everything subsequently done to pursue the claims constitutes an abuse of process. See Exhs. A at 18-

27, C at 4-7. Because Edwards has conclusively demonstrated that Epstein's actions in pursuing his

claims were designed to coerce Edwards (and his client) to take some collateral action not properly

involved in the proceedings and did so with an ulterior purpose, summary judgment directed at the abuse

of process claim must fail. The damages suffered by Edwards include: (a) injury to his reputation; (b)

mental anguish, embarrassment and anxiety; (c) fear physical injury to himself and members of his

family; (d) the loss of the value of his time required to be diverted from his professional responsibility;

and (e) the cost of defending against Epstein's spurious and baseless claims. All the elements of the

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claim for abuse of process have been satisfied. This case, then, falls within the parameters of the Third

District's Decision in Scozari v. Barone, supra in which the court reversed the entry of summary

judgment for the defendant on claims of malicious prosecution and abuse of process.

With respect to the

abuse of process claim, the court stated that "if there was no reasonable basis in

law and fact to bring the action to impress a lien on property, and this was done without any reasonable justification under law and to force or compel the appellant to resolve some custody dispute, induce the appellant to pay money, or tie up the appellant's property, then there has been an abuse of process." Id at 752.

There are Disputed Issues of Fact Precluding Summary Judgment on the Claim of Malicious Prosecution

Here, Epstein's voluntary dismissal of his abuse of process claims against Edwards amounted to a

bona fide termination of the proceedings. He knew his allegations were unsupported by evidence (See

discussion above at pages 3-6). Knowing he lacked any verifiable evidence against Edwards, on the eve

of the summary judgment hearing, Epstein effectively conceded that fact by voluntarily dismissing his

claims. Hence, it is evident that Epstein took voluntary dismissal of his claims because he knew he did

not have probable cause or an evidentiary basis to support the allegations. See Cohen v. Corwin, 980 So.

2d 1153 at 1156 (citing Union Oil of California, Amsco Division v. Watson, 468 So. 2d 349 at 354

(stating that "where a dismissal is taken because of insufficiency of the evidence, the requirement of a

favorable termination is met")). Accordingly, the manner of termination reflects on the merits of the case

and there was a bona fide termination of Epstein's civil proceeding against Edwards (See Judge Crow's

Order of March 29, 2012 denying Motion to Dismiss re: Issue of Bonafide Termination attached as

Exhibit "fn.

Epstein's only other issue with Edwards' counterclaim for malicious prosecution is that he did not

lack probable cause in pursuing his claims against Edwards. As established by the record, Epstein did, in

fact, lack probable cause to assert his claims against Edwards (See discussion above). Epstein's purported

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reliance on public filings, including the Scherer Complaint against Rothstein is unavailing. As discussed

above, the evidence warrants the finding that Epstein knew that Edwards was legitimately pursuing the

claims on behalf of his clients which included the effort to secure testimony from Epstein's close

confidants. Therefore, Epstein cannot rely upon the referenced public documents to support his claims

against Edwards given that he knows that information to be untrue and he refuses to

answer questions

about the veracity of the information. See Exh. G at pgs. 53:6-24; 78:16-24; 87:20-88:14. Consequently,

Epstein had no good faith basis to rely on such information.

Epstein's Assertion of his Fifth Amendment Privilege Gives Rise to Adverse Inferences

Pertinent to His Motion for Summary Judgment and Precludes His Reliance on Purported Undisputed Facts

As discussed above, Epstein's multiple invocations of his Fifth Amendment Privilege results in

adverse inferences which directly impact the issues advanced in his Motion for Summary Judgment. "It

is well settled that the Fifth Amendment does not forbid adverse inferences against parties to civil actions

when they refuse to testify in response to probative evidence offered against them."

Baxter v.

Palinignano, 425 U.S. 308, 318 (1976); Accord, Vasquez v. State, 777 So. 2d 1200, 1203 (Fla. at 2001).

The reason for this rule "is both logical and utilitarian. A party may not trample upon the rights of others

and then escape the consequences by invoking a constitutional privilege – at least not in a civil setting."

Fraser v. Security and INV. Corp, 615 So. 2d. 841, 842 (Fla. 4th DCA 1993). The adverse inferences

drawn from Epstein's assertion of the Fifth Amendment undercut his claim of justifiable reliance based

upon the purported undisputed material facts to support his Motion for Summary Judgment.

Moreover, because Epstein elected to hide behind the shield of his right against self-incrimination

to preclude his disclosing any relevant information about the criminal activity at the center of his claims,

he was effectively barred from prosecuting his abuse of process claim against Edwards. Similarly, Epstein

should be barred from utilizing the Fifth Amendment privilege to secure summary judgment based upon

assertions of fundamental facts when Epstein refused to testify on essential issues pertinent to the

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arguments advanced in support of his Motion for Summary Judgment. Under the well-established "sword

and shield" doctrine, Epstein could not seek damages from Edwards while at the same time asserting a

Fifth Amendment privilege to block relevant discovery. See Exhs. B at 14-21, C at 18-25, G at 53:6-24;

78:16-24; 87:20-88:14. The same policies which underlie the sword and shield doctrine as applied to the

recovery of affirmative relief should also apply to attempts to advance positions

with respect to a Motion

for Summary Judgment which would have the effect of securing relief against certain claims.

"[T]he law is well settled that a plaintiff is not entitled to both his silence and his lawsuit." Boys

& Girls Clubs of Marion County, Inc. v. JA., 22 So. 3d 855, 856 (Fla. 5th DCA 2009)(Griffin, J.,

concurring specially). Thus, "a person may not seek affirmative relief in a civil action and then invoke the fifth amendment to avoid giving discovery, using the fifth amendment as both a 'sword and a shield.'"

DePalma v. DePalma, 538 So. 2d 1290, 1290 (Fla. 4th DCA 1989)(quoting DeLisi v. Bankers Insurance

Co., 436 So. 2d 1099 (Fla. 4th DCA 1983)). Put another way, "[a] civil litigant's fifth amendment right to

avoid self-incrimination may be used as a shield but not a sword. This means that a plaintiff seeking

affirmative relief in a civil action may not invoke the fifth amendment and refuse to comply with the

defendant's discovery requests, thereby thwarting the defendant's defenses." Rollins Burdick Hunter of

New York, Inc. v. Euroclassic Limited, Inc., 502 So. 2d 959 (Fla. 3d DCA 1983).. For the same reasons,

Epstein should be precluded from advancing arguments based on purported statements of undisputed fact

which cannot be effectively challenged in light of his assertion of the Fifth Amendment.

Epstein has

done precisely what well-established law prohibits.

Conclusion

Based upon the foregoing, the Defendant, Counter-Plaintiff, Bradley Edwards respectfully

submits that Jeffrey Epstein's Motion for Summary Judgment must be denied.

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I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all

Counsel on the attached list, this / -7 day of G7(>-, - , 2014.

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IN THE CIRCUIT COURT OF THE 15TH

JUDICIAL CIRCUIT IN AND FOR PALM

BEACH COUNTY, FLORIDA

Case No.: 50 2009 CA 040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually, and

BRADLEY J. EDWARDS, individually,

Defendants,

STATEMENT OF UNDISPUTED FACTS

Defendant Bradley J. Edwards, Esq., offers the following specific facts as the undisputed

material facts in this case. Each of the following facts is numbered separately and individually to

facilitate Epstein's required compliance with Fla. R. Civ. P. 1.510(c) ("The adverse party shall

identify . . . any summary judgment evidence on which the adverse party relies.").

All

referenced exhibits and attachments have previously been filed with the Court and provided to

Epstein.

Sexual Abuse of Children By Epstein

1. Defendant Epstein has a sexual preference for young children. Deposition of Jeffrey Epstein, Mar. 17, 2010, at 110 (hereinafter "Epstein Depo.") (Deposition Attachment

#1).

I When questioned about this subject at his deposition, Epstein invoked his Fifth Amendment right to

remain silent rather than make an incriminating admission. Accordingly, Edwards is entitled to the

adverse inference against Epstein that, had Epstein answered, the answer would have been unfavorable to

him. "It is well-settled that the Fifth Amendment does not forbid adverse inferences against parties to

EXHIBIT

2. Epstein repeatedly sexually assaulted more than forty (40) young girls on numerous occasions between 2002 and 2005 in his mansion in West Palm Beach, Florida. These

sexual assaults included vaginal penetration. Epstein abused many of the girls dozens if not

hundreds of times. Epstein Depo. at 109 ("Q: How many times have you engaged in oral sex

with females under the age of 18r A: [Invocation of the Fifth Amendment]);
Deposition of Jane
Doe, September 24, 2009 and continued March 11, 2010, at 527 (minor girl sexually
abused at
least 17 times by Epstein) (hereinafter "Jane Doe Depo") (Deposition Attachment #2);
id. 564-67
(vaginal penetration by Epstein with his finger), 568 (vaginal penetration by
Epstein with a
massager); Deposition of L.M., September 24, 2009, at 73 (hereinafter "L.M. Depo")
(Deposition Attachment #3) (describing the manner in which Epstein abused her
beginning when
LM was 13 years old, touching her vagina with his fingers and vibrator) at 74, line
12-13 (she
was personally molested by Epstein more than 50 times), at 164, line 19-23 and 141,
line 12-13
and 605, line 3-6 (describing that in addition to being personally molested by
Epstein she was
paid \$200 per underage girl she brought Epstein and she brought him more than
seventy (70)
underage girls - she told him that she did not want to bring him any more girls and
he insisted
that she continue to bring him underage girls); Deposition of E.W., May 6, 2010
(hereinafter
"E.W. Depo") (Deposition Attachment till) at 115-116, 131 and 255 (describing
Epstein's abuse
of her beginning at age 14 when he paid her for touching her vagina, inserting his
fingers and
civil actions when they refuse to testify in response to probative evidence offered
against them." Baxter
v. Palmigiano, 425 U.S. 308, 318 (1976); accord Vasquez v. State, 777 So.2d 1200,
1203 (Fla. App.
2001). The reason for this rule "is both logical and utilitarian. A party may not
trample upon the rights of
others and then escape the consequences by invoking a constitutional privilege - at
least not in a civil
setting." Fraser v. Security and Inv. Corp., 615 So.2d 841, 842 (Fla. App. 1993).
2
using a vibrator and he also paid her \$200 for each other underage female E.W.
brought him to
molest. She brought him between 20 and 30 underage females); Deposition of Jane Doe
It4, date
(hereinafter "Jane Doe ftl Depo") (Deposition Attachment #5) at 32-34, and 136 (she
describes
first being taken to Epstein at 15 years old, "Being fingered by him, having him use
a vibrator on
[me], grabbing my nipples, smelling my butt, jerking off in front of me, licking my
clit, several
times.").
3. At all relevant times Edwards has had a good faith basis to conclude and did
conclude' that Epstein was able to access a large number of underage girls through a

pyramid

abuse scheme in which he paid underage victims \$200-\$300 cash for each other
underage victim

that she brought to him. See Palm Beach Police Incident Report at 87 (hereinafter
"Incident

Report") (Exhibit "A").³ The Palm Beach Police Incident Report details Epstein's
scheme for

molesting underage females. Among other things, the Incident Report outlines some of
the

experiences of other Epstein victims. When S.G., a 14 year old minor at the time, was
brought to

Epstein's home, she was taken upstairs by a woman she believed to be Epstein's
assistant. The

woman started to fix up the room, putting covers on the massage table and bringing
lotions out.

The "assistant" then left the room and told S.G. that Epstein would be up in a
second. Epstein

walked over to S.G. and told her to take her clothes off in a stern voice. S.G.
states in the report

she did not know what to do, as she was the only one there. S.G. took off her shirt,
leaving her

bra on. Epstein, then in a towel told her to take off everything. S.G. removed her
pants leaving

2 In support of all assertions concerning the actions Edwards took, what Edwards
learned in the course of his

representation of his clients, Edwards's good faith beliefs and the foundation for
those beliefs, see Edwards

Affidavit and specifically paragraphs 25 and 25 of that Affidavit.

3 For clarity, depositions attached to this memorandum will be identified
numerically as attachments #1, #2, #3, etc.,

while exhibits attached to this memorandum will be identified alphabetically as
exhibits A, B, C, etc.

3

on her thong panties. Epstein then instructed S.G. to give him a massage. As S.G. gave
Epstein a

massage, Epstein turned around and masturbated. S.G. was so disgusted, she did not
say

anything; Epstein told her she "had a really hot body." Id. at 14. In the report,
S.G. admitted

seeing Jeffrey Epstein's penis and stated she thought Epstein was on steroids
because he was a

"really built guy and his wee wee was very tiny." Id. at 15.

4. The exact number of minor girls who Epstein assaulted is known only to Epstein.
However, Edwards had a good faith basis to believe and did in fact believe that
Epstein's victims

were substantially more than forty (40) in number. In addition to the deposition
excerpts from

two of his many victims above about the number of underage girls brought to Epstein
and the

Palm Beach incident report, there is overwhelming proof that the number of underage

girls

molested by Epstein through his scheme was in the hundreds. See Complaint, Jane Doe 102 v.

Epstein, (hereinafter Jane Doe 102 complaint) (Exhibit "B"); see also Deposition of Jeffrey

Epstein, April 14, 2010, at 442, 443, and 444 (Epstein invoking the 5th on questions about his

daily abuse and molestation of children) (Deposition Attachment #6).

5. At all relevant times Edwards has had a good faith basis to believe and did in fact

believe that Epstein and his attorneys knew of the seriousness of the criminal investigation

against him and corresponded constantly with the United States Attorney's Office in an attempt

to avoid the filing of numerous federal felony offenses, which effort was successful.

See

Correspondence from U.S. Attorney's Office to Epstein (hereinafter "U.S. Attorney's Correspondence") (Composite Exhibit "C") (provided in discovery during the Jane Doe v. Epstein case).

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6. At all relevant times Edwards has had a good faith basis to believe and did in fact

believe that, more specifically, Epstein's attorneys knew of Epstein's scheme to recruit minors for

sex and also knew that these minors had civil actions that they could bring against him. In fact,

there was much communication between Epstein's attorneys and the United States Prosecutors in

a joint attempt to minimize Epstein's civil exposure. For example, on October 3, 2007, Assistant

U.S. Attorney Marie Villafaila sent an email (attached hereto as Exhibit "D") to Jay Lefkowitz,

counsel for Epstein, with attached proposed letter to special master regarding handling numerous

expected civil claims against Epstein. The letter reads in pertinent part,

"The undersigned, as counsel for the United States of America and

Jeffrey Epstein, jointly write to you to provide information relevant to your service as a Special Master in the selection of an attorney to represent several young women who may have civil damages claims against Mr. Epstein. The

U.S. Attorney's Office and the Federal Bureau of Investigation (jointly referred to as the "United States") have conducted an investigation of Jeffrey Epstein regarding his solicitation of minor females in Palm Beach County to engage in prostitution. Mr. Epstein, through his assistants, would recruit underage

females to travel to his home in Palm Beach to engage in lewd conduct in exchange for money. Based upon the investigation, the United States has

identified forty (40) young women who can be characterized as victims pursuant to 18 USC 2255. Some of those women went to Mr. Epstein's home

only once, some went there as much as 100 times or more. Some of the

women's conduct was limited to performing a topless or nude massage while Mr. Epstein-masturbated himself. For other women, the conduct escalated to full sexual intercourse. As part of the resolution of the case, Epstein has agreed that he would not contest jurisdiction in the Southern District of Florida for any victim who chose to sue him for damages pursuant to 18 USC 2255. Mr. Epstein agreed to provide an attorney for victims who elected to proceed exclusively pursuant to that section, and agreed to waive any challenge to liability under that section up to an amount agreed to by the parties. The parties have agreed to submit the selection of an attorney to a Special Master...."

7. At all relevant times Edwards has had a good faith basis to believe and did in fact

believe that L.M. was, in fact, a victim of Epstein's criminal abuse because L.M. was one of the

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minor females that the United States Attorney's Office recognized as a victim. L.M.'s sworn

deposition testimony and the adverse inference drawn from Epstein's refusal to testify confirm

that Epstein began sexually assaulting L.M. when she was 13 years old and continued to molest

her on more than fifty (50) occasions over three (3) years. Epstein Depo., Attachment #1, at 17

("Q: Did you . . . ever engage in any sexual conduct with L.M.?" A: [Invocation of the Fifth

Amendment].); see also Epstein Depo., April 14, 2010, Attachment #6, at 456 ("Q: LM was an

underage female that you first abused when she was 13 years old; is that correct?"

A: [Invocation

of Fifth Amendment].)

8. Epstein was also given ample opportunity to explain why he engaged in sexual activity with L.M. beginning when L.M. was 13 years old and why he has molested minors on an

everyday basis for years, and he invoked his 5th amendment right rather than provide explanation.

See Epstein Deposition, February 17, 2010, at 11-12, 30-31 (Deposition Attachment # 7).

9. Epstein also sexually assaulted E.W., beginning when she was 14 years old and did so on numerous occasions. See E.W. Depo., Attachment #1 at 215-216.

10. Another of the minor girls Epstein sexually assaulted was Jane Doe; the abuse began when Jane Doe was 14 years old. Rather than incriminate himself, Epstein invoked the

5th amendment to questions about him digitally penetrating Doe's vagina, using vibrators on her

vagina and masturbating and ejaculating in her presence. Epstein Depo., April 14, 2010,

Attachment #6, at 420, 464, 468.

11. When Edwards's clients L.M., E.W., and Jane Doe were 13 or 14 years old, each was brought to Epstein's home multiple times by another underage victim. Epstein engaged in

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one or more of the following acts with each of the then-minor girls at his mansion: receiving a topless or completely nude massage; using a vibrator on her vagina; masturbating in her presence; ejaculating in her presence; touching her breast or buttocks or vagina or the clothes covering her sexual organs; and demanding that she bring him other underage girls. Epstein and his co-conspirators used the telephone to contact these girls to entice or induce them into going to his mansion for sexual abuse. Epstein also made E.W. perform oral sex on him and was to perform sex acts on Nadia Marcinkova (Epstein's live-in sex slave) in Epstein's presence. See Plaintiff Jane Doe's Notice Regarding Evidence of Similar Acts of Sexual Assault, filed in Jane Doe v. Epstein, No. 08-cv-80893 (S.D. Fla. 2010), as DE 197, (hereinafter "Rule 413 Notice") (Exhibit "F"); Jane Doe Depo., Attachment #2, at 379-380; L.M. Depo., Attachment #3, at 416; E.W. Depo., Attachment #4, at 205.

12. At all relevant times Edwards has had a good faith basis to believe and did in fact believe that yet another of the minor girls Epstein sexually assaulted was C.L. When she was approximately 15 years old, C.L. was brought to Epstein's home by another underage victim. While a minor, she was at Epstein's home on multiple occasions. Epstein engaged in one or more of the following acts with her while she was a minor at his house - topless or completely nude massage on Epstein; Epstein used a vibrator on her vagina; Epstein masturbated in her presence; Epstein ejaculated in her presence; Epstein also demanded that she bring him other underage girls. See Rule 413 Notice, Exhibit "E"; Incident Report, Exhibit "A."

13. At all relevant times Edwards has had a good faith basis to believe and did in fact believe that yet another girl Epstein sexually assault was A.H. When she was approximately 16 years old, she was brought to Epstein's home by another underage victim. While a minor, she

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was at Epstein's home on multiple occasions. Epstein engaged in one or more of the following acts with her while she was a minor at his house - topless or completely nude massage on Epstein; Epstein used a vibrator on her vagina; Epstein masturbated in her presence; Epstein ejaculated in her presence; Epstein touched her breast or buttock or vagina or the

clothes

covering her sexual organs; was made to perform sex acts on Epstein; made to perform sex acts

on Nadia Marcinkova in Epstein's presence. Epstein also forcibly raped this underage victim, as

he held her head down against her will and pumped his penis inside her while she was screaming

"No". See Rule 413 Notice, Exhibit "E"; Incident Report, Exhibit "A", at 41 (specifically

discussing the rape):

"[A.H.] remembered that she climaxed and was removing herself from the massage table. [A.H.] asked for a sheet of paper and drew the massage table in the master bathroom and where Epstein, Marcinkova and she were. Epstein turned [A.H.] on to her stomach on the massage bed and inserted his penis into her vagina. [A.H.] stated Epstein began to pump his penis in her vagina. [A.H.] became upset over this. She said her head was being held against the bed forcibly, as he continued to pump inside her. She screamed no, and Epstein stopped"

"[A.H.] advised there were times that she was so sore when she left Epstein's house. [A.H.] advised she was ripped, torn, in her vagina area. [A.H.] advised she had difficulty walking to the car after leaving the house because she was so sore."

14. Without detailing each fact known about Epstein's abuse of the many underage girls, Edwards has had a good faith basis to believe and did in fact believe at all relevant times

that Epstein also abused other victims in ways closely similar to those described in the preceding

paragraphs. Epstein's additional victims include the following (among many other) young girls:

S.G.; A.D.; V.A.; N.R.; J.S.; V.Z.; J.A.; F.E.; M.L.; M.D.; D.D.; and D.N. These girls were

between the ages of 13 and 17 when Epstein abused them. See Rule 413 Notice, Exhibit E;

Deposition of E.W., Deposition Attachment /Pl.

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15. One of Mr. Epstein's household employees, Mr. Alfredo Rodriguez, saw numerous underage girls coming into Epstein's mansion for purported "massages."

See

Rodriguez Depo. at 242-44 (Deposition Attachment #8). Rodriguez was aware that "sex toys"

and vibrators were found in Epstein's bedroom after the purported massages. Id. at 223-28.

Rodriguez thought what Epstein was doing was wrong, given the extreme youth of the girls he

saw. Id. at 230-31..

16. Alfredo Rodriguez took a journal from Epstein's computer that reflected many of the names of underage females Epstein abused across the country and the world, including

locations such as Michigan, California, West Palm Beach, New York, New Mexico, and Paris,

France. See Journal (hereinafter "The Journal" or "Holy Grail") (Exhibit "F") (identifying,

among other Epstein acquaintances, females that Rodriguez believes were underage under the

heading labeled "Massages").

17. Rodriguez was later charged in a criminal complaint with obstruction of justice in

connection with trying to obtain \$50,000 from civil attorneys pursuing civil sexual assault cases

against Epstein as payment for producing the book to the attorneys. See Criminal Complaint at

2, U.S. v. Rodriguez, No. 9:10-CR-80015-KAM (S.D. Fla. 2010) (Exhibit "G").

Rodriguez

stated he needed money because the journal was his "property" and that he was afraid that

Jeffrey Epstein would make him "disappear" unless he had an "insurance policy" (i.e., the

journal). Id. at 3. Because of the importance of the information in the journal to the civil cases,

Mr. Rodriguez called it "The Holy Grail."

18. In the "Holy Grail" or "The Journal," among the many names listed (along with the abused girls) are some of the people that Epstein alleges in his Complaint had "no connection

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whatsoever" with the litigation in this case. See, e.g., Journal, Exhibit F, at 85 (Donald Trump);

at 9 (Bill Clinton phone numbers listed under "Doug Bands").

Federal Investigation and Plea Agreement With Epstein

19. In approximately 2005, the FBI and the U.S. Attorney's Office in the Southern District of Florida learned of Epstein's repeated sexual abuse of minor girls. They began a

criminal investigation into federal offenses related to his crimes.

See U.S. Attorney's

Correspondence, Exhibit C.

20. At all relevant times Edwards has had a good faith basis to believe and did in fact

believe that to avoid the Government learning about his abuse of minor girls, Epstein threatened

his employees and demanded that they not cooperate with the government. Epstein's aggressive

witness tampering was so severe that the United States Attorney's Office prepared negotiated

plea agreements containing these charges. For example, in a September 18, 2007, email from

AUSA Villafafia to Lefkowitz (attached hereto as Exhibit "I-F), she attached the proposed plea

agreement describing Epstein's witness tampering as follows:

"UNITED STATES vs. JEFFREY EPSTEIN PLEA PROFFER"

On August 21, 2007, FBI Special Agents E. Nesbitt Kuyrkendall and Jason

Richards traveled to the home of Leslie Groff to serve her with a federal grand jury subpoena with an investigation pending in the Southern District of Florida.

Ms. Groff works as the personal assistant of the defendant. Ms. Groff began

speaking with the agents and then excused herself to go upstairs to check on her sleeping child. While upstairs, Ms. Groff telephoned the defendant, Jeffrey Epstein, and informed him that the FBI agents were at her home. Mr. Epstein instructed Ms. Groff not to speak with the agents and reprimanded her for allowing them into her home. Mr. Epstein applied pressure to keep Ms. Groff from complying with the grand jury subpoenas that the agents had served upon her. In particular, Mr. Epstein warned Ms. Groff against turning over documents and electronic evidence responsive to the subpoena and pressured her to delay her
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appearance before the grand jury in the Southern District of Florida. This conversation occurred when Mr. Epstein was aboard his privately owned civilian aircraft in Miami in the Southern District of Florida. His pilot had filed a flight plan showing the parties were about to return to Teterboro, NJ. After the conversation with Ms. Groff, Mr. Epstein became concerned that the FBI would try to serve his traveling companion, Nadia Marcinkova, with a similar grand jury subpoena. In fact, the agents were preparing to serve Ms. Marcinkova with a target letter when the flight landed in Teterboro. Mr. Epstein then redirected his airplane, making the pilot file a new flight plan to travel to the US Virgin Islands instead of the New York City area, thereby keeping the Special Agents from serving the target letter on Nadia Marcinkova. During the flight, the defendant verbally harassed Ms. Marcinkova, harassing and pressuring her not to cooperate with the grand jury's investigation, thereby hindering and dissuading her from reporting the commission of a violation of federal law to a law enforcement officer, namely, Special Agents of the FBI. Epstein also threatened and harassed Sarah Kellen against cooperating against him as well.

21. Edwards learned that the Palm Beach police department investigation ultimately led to the execution of a search warrant at Epstein's mansion in October 2005. See Police

Incident Report, Exhibit A.

22. Edwards learned that at around the same time, the Palm Beach Police Department also began investigating Epstein's sexual abuse of minor girls. They also collected evidence of

Epstein's involvement with minor girls and his obsession with training sex slaves, including

pulling information from Epstein's trash. Their investigation showed that Epstein ordered from

Amazon.com on about September 4, 2005, such books as: SM101: A Realistic Introduction, by

Jay Wiseman; SlaveCraft: Roadmaps for Erotic Servitude - Principles, Skills, and Tools, by Guy

Baldwin; and Training with Miss Abernathy: A Workbook for Erotic Slaves and Their Owners,

by Christina Abernathy. See Receipt for Sex Slave Books (Exhibit "r").

23. The Palm Beach incident reports provided Edwards with the names of numerous witnesses that participated in Epstein's child molestation criminal enterprise and also provided

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Edwards with some insight into how far-reaching Epstein's power was and how addicted Epstein

was to sex with children. See Incident Report, Exhibit A.

24. The Palm Beach Police Depai talent also collected Epstein's message pads, which provided other names of people that also knew Epstein's scheme to molest children. See

Message Pads (Exhibit "J") (note: the names of underage females have been redacted to protect the anonymity of the underage sex abuse victims). Those message pads show clear indication that Epstein's staff was frequently working to schedule multiple young girls between the ages of

12 and 16 years old literally every day, often two or three times per day. Id.

25. In light of all of the information of numerous crimes committed by Epstein, Edwards learned that the U.S. Attorney's Office began preparing the filing of federal criminal charges against Epstein.

For example, in addition to the witness tampering and money laundering charges the U.S. Attorney's Office prepared an 82-page prosecution memo and a 53-

page indictment of Epstein related to his sexual abuse of children. On September 19, 2007, at

12:14 PM, AUSA Villafacia wrote to Epstein's counsel, Jay Lefkowitz, "Jay - I hate to have to be

firm about this, but we need to wrap this up by Monday. I will not miss my indictment date

when this has dragged on for several weeks already and then, if things fall apart, be left in a less

advantageous position than before the negotiations. I have had an 82-page pros memo and 53-

page indictment sitting on the shelf since May to engage in these negotiations.

There has to be

an ending date, and that date is Monday." These and other communications are within the

correspondence attached as Composite Exhibit "C."

26. Edwards learned that rather than face the filing of federal felony criminal charges,

Epstein (through his attorneys) engaged in plea bargain discussions.

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As a result of those

discussions, on September 24, 2007, Epstein signed an agreement with the U.S. Attorney's

Office for the Southern District of Florida. Under the agreement, Epstein agreed to plead guilty

to an indictment pending against him in the 15th Judicial Circuit in and for Palm Beach County

charging him with. solicitation of prostitution and procurement of minors for prostitution.

Epstein also agreed that he would receive a thirty month sentence, including 18 months of jail

time and 12 months of community control. In exchange, the U.S. Attorney's Office agreed not to

pursue any federal charges against Epstein. See Non-Prosecution Agreement (Exhibit

"K").

27. Part of the Non-Prosecution Agreement that Epstein negotiated was a provision in which the federal government agreed not to prosecute Epstein's co-conspirators.

The coconspirators

procured minor females to be molested by Epstein. One of the co-conspirators - Nadia Marcinkova - even participated in the sex acts with minors (including E.W.) and Epstein.

See Incident Report, Exhibit "A", at 40-42, 49-51; Deposition of Nadia Marcinkova, April 13,

2010, (hereinafter "Marcinkova Depo.") at 11 (Deposition attachment #9).

28. Under the Non-Prosecution Agreement, Epstein was to use his "best efforts" to enter into his guilty pleas by October 26, 2007. However, Edwards learned that Epstein violated

his agreement with the U.S. Attorney's Office to do so and delayed entry of his plea. See Letter

from U.S. Attorney R. Alexander Acosta to Lilly Ann Sanchez, Dec. 19, 2007 (Exhibit "L").

29. On January 10, 2008 and again on May 30, 2008 E.W. and L.M. received letters from the FBI advising them that "This case is currently under investigation. This can be a

lengthy process and we request your continued patience while we conduct a thorough investigation." Letters attached at Composite Exhibit M. This document is evidence that the

FBI did not notify E.W. and L.M. that a plea agreement had already been reached that would

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block federal prosecution of Epstein. Nor did the FBI notify E.W. and L.M. of any of the parts of

the plea agreement. Nor did the FBI or other federal authorities confer with E.W. and L.M.

about the plea. See id.

30. In 2008, Edwards believed in good faith that criminal prosecution of Epstein was extremely important to his clients E.W. and L.M. and that they desired to be consulted by the

FBI and/or other representatives of the federal government about the prosecution of Epstein.

The letters that they had received around January 10, 2008, suggested that a criminal

investigation of Epstein was on-going and that they would be contacted before the federal

government reached any final resolution of that investigation. See id.

Edwards Agrees to Serve as Legal Counsel for Three Victims of Epstein's Sexual Assaults

31. In about April 2008, Bradley J. Edwards, Esq., was a licensed attorney in Florida,

practicing as a sole practitioner. As a former prosecutor, he was well versed in civil cases that

involved criminal acts, including sexual assaults. Three of the many girls Epstein had abused -

L.M., E.W., and Jane Doe - all requested that Edwards represent them civilly and

secure

appropriate monetary damages against Epstein for repeated acts of sexual abuse while they were

minor girls. Two of the girls (L.M. and E.W.) also requested that Edwards represent them in

connection with a concern that the Federal Bureau of Investigation (FBI) and U.S. Attorney's

Office might be arranging a plea bargain for the criminal offenses committed by Epstein without

providing them the legal rights to which they were entitled (including the right to be notified of

plea discussions and the right to confer with prosecutors about any plea arrangement).

See

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Affidavit of Bradley. J. Edwards, Esq. at ¶1 - 2, ¶4 (hereinafter "Edwards Affidavit") (Exhibit N").

32. On June 13, 2008, attorney Edwards agreed to represent E.W.; on July 2, 2008, attorney Edwards agreed to represent Jane Doe; and, on July 7, 2008, attorney Edwards agreed to

represent L.M. in connection with the sexual assaults committed by Epstein and to insure that

their rights as victims of crimes were protected in the criminal process on-going against Epstein.

Mr. Edwards and his three clients executed written retention agreements. See id. at ¶2.

33. In mid June of 2008, Edwards contacted AUSA Villafafia to inform her that he represented Jane Doe #1 and, later, Jane Doe #2. AUSA Villafafia did not advise that a plea

agreement had already been negotiated with Epstein's attorneys that would block federal

prosecution. To the contrary, AUSA Villafafia mentioned a possible indictment. AUSA Villafafia did indicate that federal investigators had concrete evidence and information that

Epstein had sexually molested many underage minor females, including E.W., LM, and Jane

Doe. See id. at ¶4.

34. Edwards also requested from the U.S. Attorney's Office the information that they had collected regarding Epstein's sexual abuse of his clients. However, the U.S. Attorney's

Office, declined to provide any such information to Edwards. It similarly declined to provide

any such information to the other attorneys who represented victims of Epstein's sexual assaults.

At the very least, this includes the items that were confiscated in the search warrant of Epstein's

home, including dildos, vibrators, massage table, oils, and additional message pads. See

Property Receipt (Exhibit "0").

35. On Friday, June 27, 2008, at approximately 4:15 p.m., AUSA Villafafia received a copy of Epstein's proposed state plea agreement and learned that the plea was scheduled for 8:30

a.m., Monday, June 30, 2008. AUSA Villafafia called Edwards to provide notice to his clients

regarding the hearing. AUSA Villafafia did not tell Attorney Edwards that the guilty pleas in

state court would bring an end to the possibility of federal prosecution pursuant to the plea

agreement. See Edwards Affidavit, Exhibit "N", at ¶6.

36. Under the Crime Victims' Rights Act (CVRA), 18 U.S.C. § 3771, victims of federal crimes – including E.W. and L.M. – are entitled to basic rights during any plea

bargaining process; including the right to be treated with fairness, the right to confer with

prosecutors regarding any plea, and the right to be heard regarding any plea. The process that

was followed leading to the non-prosecution of Epstein violated these rights of E.W. and L.M.

See Emergency Petn. for Victim's Enforcement of Crime Victim's Rights, No.

9:08-CV-80736-

KAM (S.D. Fla. 2008) (Exhibit "P").

37. Because of the violation of the CVRA, on July 7, 2008, Edwards filed an action in

the U.S. District Court for the Southern District of Florida, Case No.

9:08-CV-80736, seeking to

enforce the rights of E.W. and L.M. That action alleged that the U.S. Attorney's Office had

failed to provide E.W. and L.M. the rights to which they were entitled under the Act, including

the right to be notified about a plea agreement and to confer with prosecutors regarding it. See

id.

38. On July 11, 2008, Edwards took E.W. and L.M. with him to the hearing on the CVRA action. It was only at this hearing that both victims learned for the first time that the plea

deal was already done with Epstein and that the criminal case against Epstein had been

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effectively terminated by the U.S. Attorney's office. See Hearing Transcript, July 11, 2008

(Exhibit "Q").

39. Edwards learned that Jane Doe felt so strongly that the plea bargain was inappropriate that she made her own determination to appear on a television program and

exercise her First Amendment rights to criticize the unduly lenient plea bargain Epstein received

in a criminal case.

40. The CVRA action that Edwards filed was recently administratively closed and

Edwards filed a Motion to reopen that proceeding. See No. 9:08-CV-80736 (S.D. Fla.).
Epstein's Entry of Guilty Pleas to Sex Offenses

41. Ultimately, on June 30, 2008, in the Fifteenth Judicial Circuit in Palm Beach County, Florida, defendant Epstein, entered pleas of "guilty" to various Florida state crimes

involving the solicitation of minors for prostitution and the procurement of minors for the

purposes of prostitution. See Plea Colloquy (Exhibit "R").

42. As a condition of that plea, and in exchange for the Federal Government not prosecuting the Defendant, Epstein additionally entered into an agreement with the Federal

Government acknowledging that approximately thirty-four (34) other young girls could receive

payments from him under the federal statute providing for compensation to victims of child

sexual abuse, 18 U.S.C. § 2255. As had been agreed months before, the U.S.

Attorney's Office

did not prosecute Epstein federally for his sexual abuse of these minor girls. See Addendum to

Non-Prosecution Agreement (Exhibit "S") (in redacted fowl to protect the identities of the

minors involved).

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43. Because Epstein became a convicted sex offender, he was not to have contact with any of his victims. During the course of his guilty pleas on June 30, 2008, Palm Beach

Circuit Court Judge Deborah Dale Pucillo ordered Epstein "not to have any contact, direct or

indirect" with any victims. She also expressly stated that her no-contact order applied to "all of

the victims."

Similar orders were entered by the federal court handling some of the civil cases against Epstein. The federal court stated that it "finds it necessary to state clearly that Defendant

is under this court's order not to have direct or indirect contact with any plaintiffs" Order,

Case No. 9:08-cv-80119 (S.D. Fla. 2008), [DE 238] at 4-5 (emphasis added); see also Order,

Case No. 9:08-cv-80893, [DE 193] at 2 (emphasis added).

Edwards Files Civil Suits Against Epstein

44. Edwards had a good faith belief that his clients felt angry and betrayed by the criminal system and wished to prosecute and punish Epstein for his crimes against them in

whatever avenue remained open to them. On August 12, 2008, at the request of his client Jane

Doe, Brad Edwards filed a civil suit against Jeffrey Epstein to recover damages for his sexual

assault of Jane Doe. See Edwards Affidavit, "N" at §7. Included in this complaint was a RICO

count that explained how Epstein ran a criminal conspiracy to procure young girls

for him to

sexually abuse. See Complaint, Jane Doe v. Epstein (Exhibit "T").

45. On September 11, 2008, at the request of his client E.W., Brad Edwards filed a civil

suit against Jeffrey Epstein to recover damages for his sexual assault of E.W. See Complaint,

E.W. v. Epstein (Exhibit "U").

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46. On September 11, 2008, at the request of his client L.M., Brad Edwards filed a civil

suit against Jeffrey Epstein to recover damages for his sexual assault of L.M. See Complaint,

L.M. v. Epstein, (Exhibit "V").

47. Jane Doe's federal complaint indicated that she sought damages of more than \$50,000,000. Listing the amount of damages sought in the complaint was in accord with other

civil suits that were filed against Epstein (before any lawsuit filed by Edwards). See Complaint,

Jane Doe v. Epstein (Exhibit "W") (filed by Herman and Mermelstein, PA).

48. At about the same time as Edwards filed his three lawsuits against Epstein, other

civil attorneys were filing similar lawsuits against Epstein. For example, on or about April 14,

2008 another law firm, Herman and Mermelstein, filed the first civil action against Epstein on

behalf of one of its seven clients who were molested by Epstein. The complaints that attorney

Herman filed on behalf of his seven clients were similar in tenor and tone to the complaint that

Edwards filed on behalf of his three clients. See id.

49. Over the next year and a half, more than 20 other similar civil actions were filed by

various attorneys against Epstein alleging sexual assault of minor girls. These complaints were

also similar in tenor and tone to the complaint that Edwards filed on behalf of his clients. These

complaints are all public record and have not been attached, but are available in this Court's files

and the files of the U.S. District Court for the Southern District of Florida.

50. In addition to the complaints filed against Epstein in Florida, a female in New York,

Ava Cordero, filed a lawsuit against Epstein in New York making similar allegations - that

Epstein paid her for a massage then forced her to give him oral sex and molested her in other

ways when she was only 16 years old. Cordero was born a male, and in her complaint she

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alleges that Epstein told her during the "massage", "I love how young you are. You have a tight

butt like a baby". See Jeff Epstein Sued for "Repeated Sexual Assaults" on Teen, New York

Post, October 17, 2007, by Dareh Gregorian, link at:

http://www.nypost.com/p/news/regional/item_44z1WyLUFH7R10UtKYGPbP;jse s si onid=6CA3

EB F1BEF 68F5DE14BFB2 GAAS C37E0. See Article attached hereto as Exhibit X.

51. Edwards's three complaints against Epstein contained less detail about sexual abuse than (as one example) a complaint filed by attorney Robert Josephsberg from the law firm

of Podhurst Orseck. See Complaint, Jane Doe 102 v. Epstein (Exhibit "B"). As recounted in

detail in this Complaint, Jane Doe 102 was 15 years old when Ghislaine Maxwell discovered her

and lured her to Epstein's house. Maxwell and Epstein forced her to have sex with both of them

and within weeks Maxwell and Epstein were flying her all over the world. According to the

Complaint, Jane Doe 102 was forced to live as one of Epstein's underage sex slaves for years

and was forced to have sex with not only Maxwell and Epstein but also other politicians,

businessmen, royalty, academicians, etc. She was even made to watch Epstein have sex with

three 12-year-old French girls that were sent to him for his birthday by A French citizen that is a

friend of Epstein's. Luckily, Jane Doe 102 escaped to Australia to get away from Epstein and

Maxwell's sexual abuse.

52. Edwards learned that in addition to civil suits that were filed in court against Epstein, at around the same time other attorneys engaged in pre-filing settlement discussions

with Epstein. Rather than face filed civil suits in these cases, Epstein paid money settlements to

more than 15 other women who had sexually abused while they were minors. See articles

regarding settlements attached hereto as Composite Exhibit "Y."

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Epstein's Obstruction of Normal Discovery and Attacks on His Victims

53. Once Edwards filed his civil complaints for his three clients, he began the normal

process of discovery for cases such as these. He sent standard discovery requests to Epstein

about his sexual abuse of the minor girls, including requests for admissions, request for

production, and interrogatories. See Edwards Affidavit, Exhibit "1\T", at 11111-19 and 25.

Rather than answer any substantive questions about his sexual abuse and his conspiracy for

procuring minor girls for him to abuse, Epstein invoked his 5th amendment right against selfincrimination.

An example of Epstein's refusal to answer is attached as Composite Exhibit "Z" (original discovery propounded to Epstein and his responses invoking 5th amendment). 54. During the discovery phase of the civil cases filed against Epstein, Epstein's deposition was taken at least five times. During all of those depositions, Epstein refused to

answer any substantive questions about his sexual abuse of minor girls. See, e.g., Deposition

Attachments 1, 6 and 7.

55. During these depositions, Epstein further attempted to obstruct legitimate questioning by inserting a variety of irrelevant information about his case.

As one of

innumerable examples, on March 8, 2010, Mr. Horowitz, representing seven victims, Jane Doe's

2-8, asked, "Q: In 2004, did you rub Jane Doe 3's vagina? A: Excuse me. I'd like to answer that

question, as I would like to answer mostly every question you've asked me here today; however,

upon advice of counsel, I cannot answer that question. They've advised me I must assert my

Sixth Amendment, Fifth Amendment and Fourteenth Amendment Rights against self--excuse

me, against--under the Constitution. And though your partner, Jeffrey Heiman, was disbarred

after filing this lawsuit [a statement that was untrue], Mr. Edwards' partner sits in jail for

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fabricating cases of a sexual nature fleecing unsuspecting Florida investors and others out of

millions of dollars for cases of a sexual nature with--I'd like to answer your questions; however if

I--I'm told that if I do so, I risk losing my counsel's representation; therefore I must accept their

advice." Epstein deposition, March 8, 2010, at 106 (Deposition attachment #10).

56. When Edwards had the opportunity to take Epstein's deposition, he only asked reasonable questions, all of which related to the merits of the cases against Epstein.

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depositions of Epstein in which Mr. Edwards participated on behalf of his clients are attached to

this motion. See Edwards Affidavit, Exhibit "N" at Il 1 and Deposition attachments #1, 6, 7, 10,

11, 12, and 13. Cf. with Deposition of Epstein taken by an attorney representing BB (one in

which Edwards was not participating), <http://www.youtube.com/watch?v=V-dqoEyYXx4>; and

<http://www.youtube.com/watch?v=YCNiY1tW-r0>

57. Edwards's efforts to obtain information about Epstein's organization for procuring young girls was also blocked because Epstein's co-conspirators took the Fifth.

Deposition of Sarah Kellen, March 24, 2010 (hereinafter "Kellen Depo.") (Deposition

attachment #14); Deposition of Nadia Marcinkova, April 13, 2010, (Deposition attachment #9);

Deposition of Adriana Mucinska Ross, March 15, 2010 (hereinafter "Ross Depo.") (Deposition

attachment #15). Each of these co-conspirators invoked their respective rights against selfincrimination

as to all relevant questions, and the depositions have been attached.

58. At all relevant times Edwards has had a good faith basis to believe and did in fact

believe Sarah Kellen was an employee of Epstein's and had been identified as a defendant in at

least one of the complaints against Epstein for her role in bringing girls to Epstein's mansion to

be abused. At the deposition, she was represented by Bruce Reinhart. She invoked the Fifth on

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all substantive questions regarding her role in arranging for minor girls to come to Epstein's

mansion to be sexually abused.

Reinhart had previously been an Assistant United States

Attorney in the U.S. Attorney's Office for the Southern District of Florida when Epstein was

being investigated criminally by Reinhart's office. Reinhart left the United States Attorney's

Office and was immediately hired by Epstein to represent Epstein's pilots and certain coconspirators

during the civil cases against Epstein. See Edwards Affidavit, Exhibit `1\1" at ¶11.

59. Edwards also had other lines of legitimate discovery blocked through the efforts of Epstein and others. For example, Edwards learned through deposition that Ghislaine Maxwell

was involved in managing Epstein's affairs and companies. See deposition of Epstein's house

manager Janusz Banziak, February 16, 2010 at page 14, lines 20-23 (Deposition Attachment

#16); See deposition of Epstein's housekeeper Louella Rabuyo, October 20, 2009, page 9, lines

17-25 (Deposition Attachment #17); See deposition of Epstein's pilot Larry Eugene Morrison,

October 6, 2009, page 102-103 (Deposition Attachment #18); See deposition of Alfredo Rodriguez, August 7, 2009, page 302-306 and 348 (Deposition Attachment #8); See also Prince

Andrew's Friend, Ghislaine Maxwell, Some Underage Girls and A Very Disturbing Story, September 23, 2007 by Wendy Leigh, link at

[hap://www.redicecreations.com/article.php?id=18950HANNA_SJOBERG](http://www.redicecreations.com/article.php?id=18950HANNA_SJOBERG). Exhibit "AA".

60. Alfredo Rodriguez testified that Maxwell took photos of girls without the girls' knowledge, kept the images on her computer, knew the names of the underage girls and their

respective phone numbers and other underage victims were molested by Epstein and Maxwell

together. See Deposition of Rodriguez, Deposition attachment # 8 at 64, 169-170 and

236.

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61. In reasonable reliance on this and other information, Edwards served Maxwell for deposition in 2009. See Deposition Notice attached as Exhibit "BB." Maxwell was represented

by Brett Jaffe of the New York firm of Cohen and Gresser, and Edwards understood that her

attorney was paid for (directly or indirectly) by Epstein.

She was reluctant to give her

deposition, and Edwards tried to work with her attorney to take her deposition on terms that

would be acceptable to both sides. The result was the attached confidentiality agreement, under

which Maxwell agreed to drop any objections to the deposition, attached hereto as Exhibit "CC."

Maxwell, however, contrived to avoid the deposition.

On June 29, 2010, one day before

Edwards was to fly to NY to take Maxwell's deposition, her attorney informed Edwards that

Maxwell's mother was deathly ill and Maxwell was consequently flying to England with no

intention of returning to the United States. Despite that assertion, Ghislaine Maxwell was in fact

in the country on July 31, 2010, as she attended the wedding of Chelsea Clinton (former

President Clinton's daughter) and was captured in a photograph taken for OK magazine. Photos

from Issue 809 of the publication See US Weekly dated August 16, 2010 are attached hereto as

Exhibit "DD" and Edwards Affidavit, Exhibit "N" at ¶12.

62. Maxwell is not the only important witness to lie to avoid deposition by Edwards. Upon review of the message pads that were taken from Epstein's home in the police

trash pulls,

see. Exhibit "Y" supra, many were from Jean Luc Brunel, a French citizen and one of Epstein's

closest pals. He left messages for Epstein. One dated 4/1/05 said, "He has a teacher for you to

teach you how to speak Russian. She is 2x8 years old, not blonde. Lessons are free and you can

have your 1st today if you call." See Messages taken from Jean Luc Brunel are attached hereto as

Exhibit "EE." In light of these circumstances of the case, this message reasonably suggested to

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Edwards that Brunel might have been procuring two eight-year-old girls for Epstein to sexually abuse.

According to widely circulated press reports reviewed by Edwards, Brunel is in his sixties and has a reputation throughout the world (and especially in the modeling industry) as a

cocaine addict that has for years molested children through modeling agencies while acting as their agent – conduct that has been the subject of critical reports, books, several news articles,

and a 60 Minutes documentary on Brunel's sexual exploitation of underage models.

See

<http://bradmillershero.blogspot.com/2010/08/women-are-objects.html>, attached hereto as Exhibit

"FF."

63. Edwards learned that Brunel is also someone that visited Epstein on approximately 67 occasions while Epstein was in jail. See Epstein's jail visitor log attached as

Exhibit "GG."

64. Edwards learned that Brunel currently runs the modeling agency MC2, a company for which Epstein provides financial support. See Message Pad's attached as Exhibit "T" supra

and Sworn Statement of MC2 employee Maritza Vasquez, June 15, 2010, "Maritza Vasquez Sworn Statement" attached at Exhibit "RH" at 1-16.

65. Employees of MC2 told Edwards that Epstein's numerous condos at 301 East 66 Street in New York were used to house young models. Edwards was told that MC2 modeling

agency, affiliated with Epstein and Brunel brought underage girls from all over the world,

promising them modeling contracts. Epstein and Brunel would then obtain a visa for these girls,

then would charge the underage girls rent, presumably to live as underage prostitutes in the

condos. See Maritza Vasquez Sworn Statement, Exhibit "HH" at 7-10, 12-15, 29-30, 39-41, 59-

60 and 62-67.

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66. In view of this information suggesting Brunel could provide significant evidence of Epstein's trafficking in young girls for sexual abuse, Edwards had Brunel served in New York

for deposition. See Notice of Deposition of Jean Luc Brunel attached hereto as Exhibit "II."

Before the deposition took place, Brunel's attorney (Tama Kudman of West Palm Beach) contacted Edwards to delay the deposition date. Eventually Kudman informed Edwards in

January 2009 that Brunel had left the country and was back in France with no plans to return.

This information was untrue; Brunel was actually staying with Epstein in West Palm Beach. See

Banasiak deposition, deposition attachment #16 at 154-160 and 172-175; see also pages from

Epstein's probation file evidencing Jean Luc Brunel (JLB) staying at his house during that

relevant period of time attached Exhibit "JJ". As a result, Edwards filed a Motion for Contempt,

attached hereto as Exhibit "KK" (Because Epstein settled this case, the motion was

never ruled
upon.)

67. Edwards was also informed that Epstein paid for not only Brunel's representation during the civil process but also paid for legal representation for Sarah Kellen (Epstein's executive assistant and procurer of girls for him to abuse), Larry Visoski (Epstein's personal pilot), Dave Rogers (Epstein's personal pilot), Larry Harrison (Epstein's personal pilot), Louella Rabuyo (Epstein's housekeeper), Nadia Marcinkova (Epstein's live-in sex slave), Ghislaine Maxwell (manager of Epstein's affairs and businesses), Mark Epstein (Epstein's brother), and Janusz Banasiak (Epstein's house manager) It was nearly impossible to take a deposition of someone that would have helpful information that was not represented by an attorney paid for by Epstein. See Edwards Affidavit, Exhibit "N" at ¶11.

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68. While Epstein and others were preventing any legitimate discovery into his sexual abuse of minor girls, at the same time he was engaging (through his attorneys) in brutal questioning of the girls who had filed civil suits against him, questioning so savage that it made local headlines. See Jane Musgrave, Victims Seeking Sex offender's Millions See Painful Past Used Against Them, Palm Beach Post News, Jan. 23, 2010, available at <http://www.palmbeachpost.com/news/crime/victims-seeking-sex-offenders-millions-see-painful-pasts-192988.html> attached hereto as Exhibit "LL."

Edwards Pursues Other Lines of Discovery

69. Because of Epstein's thwarting of discovery and attacks on Edwards's clients, Edwards was forced to pursue other avenues of discovery.

Edwards only pursued legitimate discovery designed to further the cases filed against Epstein. See Edwards Affidavit, Exhibit

``N"

70. Edwards notified Epstein's attorneys of his intent to take Bill Clinton's deposition.

Edwards possessed a legitimate basis for doing so: (a) Clinton was friends with Ghislaine

Maxwell who was Epstein's longtime companion and helped to run Epstein's companies, kept

images of naked underage children on her computer, helped to recruit underage children for

Epstein, engaged in lesbian sex with underage females that she procured for Epstein, and

photographed underage females in sexually explicit poses and kept child pornography on her

computer; (b) it was national news when Clinton traveled with Epstein aboard Epstein's private plane to Africa and the news articles classified Clinton as Epstein's friend. (c) the complaint filed on behalf of Jane Doe No. 102 stated generally that she was required by Epstein to be sexually exploited by not only Epstein but also Epstein's "adult male peers, including royalty,

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politicians, academicians, businessmen, and/or other professional and personal acquaintances" - categories Clinton and acquaintances of Clinton fall into. The flight logs showed Clinton traveling on Epstein's plane on numerous occasions between 2002 and 2005. See Flight logs attached hereto as Exhibit "MM." Clinton traveled on many of those flights with Ghislaine Maxwell, Sarah Kellen, and Adriana Mucinska, - all employees and/or co-conspirators of Epstein's that were closely connected to Epstein's child exploitation and sexual abuse. The documents clearly show that Clinton frequently flew with Epstein aboard his plane, then suddenly stopped - raising the suspicion that the friendship abruptly ended, perhaps because of events related to Epstein's sexual abuse of children. Epstein's personal phone directory from his computer contains e-mail addresses for Clinton along with 21 phone numbers for him, including those for his assistant (Doug Band), his schedulers, and what appear to be Clinton's personal numbers. This information certainly leads one to believe that Clinton might well be a source of relevant information and efforts to obtain discovery from him were reasonably calculated to lead to admissible evidence. See Exhibits "B", "F" "AA", "DD", and "MM" and Edwards Affidavit, Exhibit "N" at ¶15.

71. Bradley J. Edwards, Esq., provided notice that he intended to take the deposition of Donald Trump. Edwards possessed a legitimate basis for doing so: (a) The message pads confiscated from Epstein's home indicated that Trump called Epstein's West Palm Beach mansion on several occasions during the time period most relevant to my Edwards's clients' complaints; (b) Trump was quoted in a Vanity Fair article about Epstein as saying "I've known Jeff for fifteen years. Terrific guy," "He's a lot of fun to be with. It is even said that he likes

beautiful women as much as I do, and many of them are on the younger side. No doubt about it --

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Jeffrey enjoys his social life." Jeffrey Epstein: International Moneyman of Mystery; He's pals

with a passel of Nobel Prize-winning scientists, CEOs like Leslie Wexner of the Limited,

socialite Ghislaine Maxwell, even Donald Trump. But it wasn't until he flew Bill Clinton, Kevin

Spacey, and Chris Tucker to Africa on his private Boeing 727 that the world began to wonder

who he is. By Landon Thomas Jr. (See article attached hereto as Exhibit "NN") (c) Trump

allegedly banned Epstein from his Maralago Club in West Palm Beach because Epstein sexually

assaulted an underage girl at the club; (d) Jane Doe No. 102's complaint alleged that Jane Doe

102 was initially approached at Trump's Maralago by Ghislaine Maxwell and recruited to be

Maxwell and Epstein's underage sex slave; (e) Mark Epstein (Jeffrey Epstein's brother) testified

that Trump flew on Jeffrey Epstein's plane with him (the same plane that Jane Doe 102 alleged

was used to have sex with underage girls); (f) Trump had been to Epstein's home in Palm Beach;

(g) Epstein's phone directory from his computer contains 14 phone numbers for Donald Trump,

including emergency numbers, car numbers, and numbers to Trump's security guard and houseman. Based on this information, Edwards reasonably believed that Trump might have

relevant information to provide in the cases against Jeffrey Epstein and accordingly provided

notice of a possible deposition. See deposition of Mark Epstein, September 21, 2009, at 48-50

(Deposition Attachment #19); See Jane Doe 102 v. Epstein, Exhibit "B"; Exhibit "F"; "Exhibit"J"; "N" and See Edwards Affidavit, Exhibit "N" at ¶13.

72. Edwards provided notice that he intended to depose Alan Dershowitz. Edwards possessed a legitimate basis for doing so: (a) Dershowitz is believed to have been friends with

Epstein for many years; (b) in one news article Dershowitz comments that, "I'm on my 20th

book... The only person outside of my immediate family that I send drafts to is Jeffrey" The

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Talented Mr. Epstein, By Vicky Ward on January, 2005 in Published Work, Vanity Fair (See

article attached as Exhibit "00"); (c) Epstein's housekeeper Alfredo Rodriguez testified that

Dershowitz stayed at Epstein's house during the years when Epstein was assaulting minor

females on a daily basis; (d) Rodriguez testified that Dershowitz was at Epstein's house at times when underage females were being molested by Epstein (see Alfredo Rodriguez deposition at 278-280, 385, 426-427); (e) Dershowitz reportedly assisted in attempting to persuade the Palm Beach State Attorney's Office that because the underage females alleged to have been victims of Epstein's abuse lacked credibility and could not be believed that they were at Epstein's house, when Dershowitz himself was an eyewitness to their presence at the house; (f) Jane Doe No. 102 stated generally that Epstein forced her to be sexually exploited by not only Epstein but also Epstein's "adult male peers, including royalty, politicians, academicians, businessmen, and/or other professional and personal acquaintances" – categories that Dershowitz and acquaintances of Dershowitz fall into; (g) during the years 2002-2005 Alan Dershowitz was on Epstein's plane on several occasions according to the flight logs produced by Epstein's pilot and information (described above) suggested that sexual assaults may have taken place on the plane; (h) Epstein donated \$30 Million one year to the university at which Dershowitz teaches. Based on this information, Edwards had a reasonable basis to believe that Dershowitz might have relevant information to provide in the cases against Jeffrey Epstein and accordingly provided notice of a possible deposition. See Dershowitz letters to the State Attorney's office attached as Exhibit "PP"; Deposition of Alfredo Rodriguez at 278-280; Flight Logs Exhibit "MVP"; Exhibits "B" and "00"; and Edwards Affidavit, Exhibit "N" at ¶14.

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73. Epstein's complaint alleges that Edwards provided notice that he wished to take the deposition of Tommy Mattola. That assertion is untrue. Mr. Mattola's deposition was set by the law firm of Searcy Denny Scarola Barnhart and Shipley. See Edwards Affidavit, Exhibit "N" at T16.

74. Edwards gave notice that he intended to take David Copperfield's deposition. Edwards possessed a legitimate basis for doing so. Epstein's housekeeper and one of the only witnesses who did not appear for deposition with an Epstein bought attorney, Alfredo Rodriguez, testified that David Copperfield was a guest at Epstein's house on several occasions. His name also appears frequently in the message pads confiscated from Epstein's house. It has been

publicly reported that Copperfield himself has had allegations of sexual misconduct made against him by women claiming he sexually abused them, and one of Epstein's sexual assault victims also alleged that Copperfield had touched her in an improper sexual way while she was at Epstein's house. Mr. Copperfield likely has relevant information and deposition was reasonably calculated to lead to the discovery of admissible evidence. See Edwards Affidavit, Exhibit "N" at ¶17.

75. Epstein also takes issue with Edwards identifying Bill Richardson as a possible witness. Richardson was properly identified as a possible witness because Epstein's personal pilot testified to Richardson joining Epstein at Epstein's New Mexico Ranch. There was information indicating that Epstein had young girls at his ranch which, given the circumstances of the case, raised the reasonable inference he was sexually abusing these girls as he had abused girls in West Palm Beach and elsewhere. Richardson had also returned campaign donations that were given to him by Epstein, indicating that he believed that there was something about Epstein

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with which he did not want to be associated. Richardson was not called to testify nor was he ever subpoenaed to testify. See Edwards Affidavit, Exhibit "N" at ¶18.

76. Edwards learned of allegations that Epstein engaged in sexual abuse of minors on his private aircraft. See Jane Doe 102 Complaint, Exhibit "B." Accordingly, Edwards pursued discovery to confirm these allegations.

77. Discovery of the pilot and flight logs was proper in the cases brought by Edwards against Epstein. Jane Doe filed a federal RICO claim against Epstein that was an active claim through much of the litigation. The RICO claim alleged that Epstein ran an expansive criminal enterprise that involved and depended upon his plane travel. Although Judge Marra dismissed the RICO claim at some point in the federal litigation, the legal team representing Edwards' clients intended to pursue an appeal of that dismissal. Moreover, all of the subjects mentioned in the RICO claim remained relevant to other aspects of Jane Doe's claims against Epstein, including in particular her claim for punitive damages. See Edwards Affidavit, Exhibit "N" at ¶19.

78. Discovery of the pilot and flight logs was also proper in the cases brought by Edwards against Epstein because of the need to obtain evidence of a federal nexus.

Edwards's

client Jane Doe was proceeding to trial on a federal claim under 18 U.S.C. § 2255. Section 2255

is a federal statute which (unlike relevant state statutes) established a minimum level of recovery

for victims of the violation of its provisions. Proceeding under the statute, however, required a

"federal nexus" to the sexual assaults. Jane Doe had two grounds on which to argue that such a

nexus existed to her abuse by Epstein: first, his use of telephone to arrange for girls to be abused;

and, second, his travel on planes in interstate commerce. During the course of the litigation,

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Edwards anticipated that Epstein would argue that Jane Doe's proof of the federal nexus was

inadequate. These fears were realized when Epstein filed a summary judgment motion raising

this argument. In response, the other attorneys and Edwards representing Jane Doe used the

flight log evidence to respond to Epstein's summary judgment motion, explaining that the flight

logs demonstrated that Epstein had traveled in interstate commerce for the purpose of facilitating

his sexual assaults.. Because Epstein chose to settle the case before trial, Judge Marra did not

rule on the summary judgment motion.

79. Edwards had further reason to believe and did in fact believe that the pilot and flight logs might contain relevant evidence for the cases against Epstein. Jane Doe No. 102's

complaint outlined Epstein's daily sexual exploitation and abuse of underage minors as young as

12 years old and alleged that Epstein's plane was used to transport underage females to be

sexually abused by him and his friends. The flight logs accordingly were a potential source of

information about either additional girls who were victims of Epstein's abuse or friends of

Epstein who may have witnessed or even participated in the abuse.

Based on this

information, Edwards reasonably pursued the flight logs in discovery.

80. In the fall of 2009, Epstein gave a recorded interview to George Rush, a reporter

with the New York Daily News about pending legal proceedings. In that interview, Epstein

demonstrated an utter lack of remorse for his crimes (but indirectly admitted his crimes) by

stating:

- People do not like it when people make good and that was one reason he (Epstein) was being targeted by civil suits filed by young girls in Florida;

- He (Epstein) had done nothing wrong;

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- He (Epstein) had gone to jail in Florida for soliciting prostitution for no reason;
- If the same thing (i.e., sexual abuse of minor girls) had happened in New York, he (Epstein) would have received only a \$200 fine;
- Bradley J. Edwards was the one causing all of Epstein's problems (i.e., the civil suits brought by Jane Doe and other girls);
- L.M. came to him as a prostitute and a drug user (i.e., came to Epstein for sex, rather than Epstein pursuing her);
- All the girls suing him are only trying to get a meal ticket;
- The only thing he might have done wrong was to maybe cross the line a little too closely;
- He (Epstein) was very upset that Edwards had subpoenaed Ghislaine Maxwell, that she was a good person that did nothing wrong (i.e., had done nothing wrong even though she helped procure young girls to satisfy Epstein's sexual desires);
- With regard to Jane Doe 102 v. Epstein, which involved an allegation that Epstein had repeatedly sexually abused a 15-year-old girl, forced her to have sex with his friends, and flew her on his private plane nationally and internationally for the purposes of sexually molesting and abusing her, he (Epstein) flippantly said that the case was dismissed, indicating that the allegations were ridiculous and untrue. See Affidavit of Michael J. Fisten attached hereto as Exhibit "QQ."

81. The Rush interview also demonstrated perjury (a federal crime) on the part of Epstein. Epstein lied about not knowing George Rush. See Epstein Deposition, February 17,

2010, taken in L.M. v. Jeffrey Epstein, case 50-2008-CA-028051, page 154, line 4 through 155

line 9, (Deposition .attachment #7), wherein Jeffrey Epstein clearly impresses that he does not

recognize George Rush from the New York Daily News. This impression was given despite the

fact that he gave a lengthy personal interview about details of the case that was tape recorded with George Rush.

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Epstein's Harassment of Witnesses Against Hinz

82. At all relevant times Edwards has a good faith basis to believe and did in fact believe that Epstein engaged in threatening witnesses. See Incident Report, Exhibit "A" at p. 82,

U.S. Attorney's Correspondence, Exhibit "C" - Indictments drafted by Federal Government

against Epstein; and Edwards Affidavit, Exhibit "N" at ¶11.

83. Despite three no contact orders entered against Epstein (see Exhibit C, supra), Edwards learned that Epstein continued to harass his victims. For example, Jane Doe had a trial

set for her civil case against him on July 19, 2010. As that trial date approached, defendant

Epstein intimidated her in violation of the judicial no-contact orders. On July 1, 2010, he had a

"private investigate" tail Jane Doe -- following her every move, stopping when she

stopped,
driving when she drove, refusing to pass when she pulled over. When Jane Doe ultimately drove to her home, the "private investigate" then parked in his car approximately 25 feet from Jane Doe house and flashed his high beam lights intermittently into the home. Even more threateningly, at about 10:30 p.m., when Jane Doe fled her home in the company of a retired police officer employed by Jane Doe's counsel, the "private investigate" attempted to follow Jane Doe despite a request not to do so. The retired officer successfully took evasive action and placed Jane Doe in a secure, undisclosed location that night. Other harassing actions against Jane Doe also followed. See Motion for Contempt filed by Edwards in Jane Doe v. Epstein detailing the event, including Fisten Affidavit attached to Motion, Composite Exhibit "RR." Epstein Settlement of Civil Claims Against Him for Sexual Abuse of Children

84. The civil cases Edwards filed against Epstein on behalf of L.M., E.W., and Jane Doe were reasonably perceived by Edwards to be very strong cases. Because Epstein had

35 sexually assaulted these girls, he had committed several serious torts against them and would be liable to them for appropriate damages. See Preceding Undisputed Facts. Because of the outrageousness of Epstein's sexual abuse of minor girls, Edwards reasonably expected that Epstein would also be liable for punitive damages to the girls. Because Edwards could show that Epstein had molested children for years and designed a complex premeditated scheme to procure different minors everyday to satisfy his addiction to sex with minors, the punitive damages would have to be sufficient to deter him from this illegal conduct that he had engaged in daily for years. Epstein was and is a billionaire. See Complaint, ¶49 (referring to "Palm Beach Billionaire"); see also Epstein Deposition, February 17, 2010, at 172-176 (Deposition Attachment #7) (taking the Fifth when asked whether he is a billionaire). Accordingly, Edwards reasonably believed the punitive damages that would have to be awarded against Epstein would have been substantial enough to punish him severely enough for his past conduct as well as deter him from repeating his offenses in the future. See Edwards Affidavit, Exhibit "I\T" at ¶19.

85. On July 6, 2010, rather than face trial for the civil suits that had been filed against him by L.M., E.W., and Jane Doe, defendant Epstein settled the cases against him. The kilns of the settlement are confidential. The settlement amounts are highly probative in the instant action as Epstein bases his claims that Edwards was involved in the Ponzi scheme on Epstein's inability to settle the L.M., E.W., and Jane Doe cases for "minimal value". His continued inability to settle the claims for "minimal value" after the Ponzi scheme was uncovered would be highly probative in discrediting any causal relationship between the Ponzi scheme and Edwards's settlement negotiations. See Edwards Affidavit, Exhibit 'IT' at ¶21. Edwards Non-Involvement in Fraud by Scott Rothstein

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86. From in or about 2005, through in or about November 2009, Scott Rothstein appears to have run a giant Ponzi scheme at his law firm of Rothstein, Rosenfeldt and Adler P.A.

("RRA"). This Ponzi scheme involved Rothstein falsely informing investors that settlement

agreements had been reached with putative defendants based upon claims of sexual harassment

and/or whistle-blower actions.

Rothstein falsely informed the investors that the potential settlement agreements were available for purchase. Plea Agreement at 2, United States v. Scott

W. Rothstein, No. 9-60331-CR-COHN (S.D. Fla. Jan. 27, 2010) attached hereto as Exhibit "SS."

87. It has been alleged that among other cases that Rothstein used to lure investors into his Ponzi scheme were the cases against Epstein that were being handled by Bradley J.

Edwards, Esq. Edwards had no knowledge of the fraud or any such use of the Epstein cases. See

Edwards Affidavit, Exhibit "N" at ¶9.

88. Bradley J. Edwards, Esq., joined RRA in about April 2009 and left RRA in November 2009 – a period of less than one year. Edwards would not have joined RRA had he

been aware that Scott Rothstein was running a giant Ponzi scheme at the firm.

Edwards left

RRA shortly after learning of Rothstein's fraudulent scheme. Id. at ¶8.

89. At no time prior to the public disclosure of Rothstein's Ponzi scheme did Edwards

know or have reason to believe that Rothstein was using legitimate claims that Edwards was

prosecuting against Epstein for any fraudulent or otherwise illegitimate purpose. Id. at ¶20.

90. Edwards never substantively discussed the merits of any of his three cases against

Epstein with Rothstein. See Deposition of Bradley J. Edwards taken March 23, 2010, at 110-16.

(hereinafter "Edwards Depo") (Deposition Attachment #22).

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91. On July 20, 2010, Bradley Edwards received a letter from the U.S. Attorney's Office for the Southern District of Florida – the office responsible for prosecuting Rothstein's

Ponzi scheme. The letter indicated that law enforcement agencies had determined that Edwards

was "a victim (or potential victim)" of Scott Rothstein's federal crimes. The letter informed

Edwards of his rights as a victim of Rothstein's fraud and promised to keep Edwards informed

about subsequent developments in Rothstein's prosecution. See Letter attached hereto as Exhibit

"TT."

92. Jeffrey Epstein filed a complaint with the Florida Bar against Bradley Edwards, Esq., raising allegations that Edwards and others were involved in the wrongdoing of Scott

Rothstein. After investigating the claim, the Florida Bar dismissed this complaint. See Edwards

Affidavit, Exhibit "N" at ¶23.

Epstein Takes the Fifth When Asked Substantive Questions About His Claims Against Edwards

93. On March 17, 2010, defendant Epstein was deposed about his lawsuit against Edwards.

Rather than answer substantive questions about his lawsuit, Epstein repeatedly invoked his Fifth Amendment privilege.

See Epstein Depo. taken 3/17/10, Deposition Attachment #1.

94. In his deposition, Epstein took the Fifth rather than answer the question: "Specifically what are the allegations against you which you contend Mr. Edwards ginned up?"

Id. at 34.

95. In his deposition, Epstein took the Fifth rather than name people in California that

Edwards had tried to depose to increase the settlement value of the civil suit he was handling. Id.

at 37.

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96. In his deposition, Epstein took the Fifth rather than answer the question: "Do you

know former President Clinton personally." Id.

97. In his deposition, Epstein took the Fifth rather than answer the question: "Are you

now telling us that there were claims against you that were fabricated by Mr. Edwards?" Id. at

39..

98. In his deposition, Epstein took the Fifth rather than answer the question, "Well,

which of Mr. Edwards' cases do you contend were fabricated." Id.

99. In his deposition, Epstein took the Fifth rather than answer the question: "What is

the actual value that you contend the claim of E.W. against you has?" Id. at 45.

100. In his deposition, Epstein took the Fifth rather than answer a question about the

actual value of the claim of L.M. and Jane Doe against him. Id.

101. In his deposition, taken prior to the settlement of Edwards's clients claims against

Epstein, Epstein took the Fifth rather than answer the question: "Is there any pending claim

against you which you contend is fabricated?" Id. at 71.

102. In his deposition, Epstein took the Fifth rather than answer the question: "Did you

ever have damaging evidence in your garbage?" Id. at 74.

103. In his deposition, Epstein took the Fifth rather than answer the question: "Did sexual assaults ever take place on a private airplane on which you were a passenger?" Id. at 88.

104. In his deposition, Epstein took the Fifth rather than answer the question:

"Does a flight log kept for a private jet used by you contain the names of celebrities, dignitaries or international figures?" Id. at 89.

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105. In his deposition, Epstein took the Fifth rather than answer the question:

"Have you ever socialized with Donald Trump in the presence of females under the age of 18?" Id. at

89.

106. In his deposition, Epstein took the Fifth rather than answer the question:

"Have you ever socialized with Alan Dershowitz in the presence of females under the age of 18." Id. at

90.

107. In his deposition, Epstein took the Fifth rather than answer the question:

"Have you ever socialized with Mr. Mottola in the presence of females under the age of 18?" Id. at 91-

92.

108. In his deposition, Epstein took the Fifth rather than answer the question: "Did you

ever socialize with David Copperfield in the presence of females under the age of 18?" Id. at

109. In his deposition, Epstein took the Fifth rather than answer the question:

"Have you ever socialized with Mr. Richardson [Governor of New Mexico and formerly U.S. Representative and 'Ambassador to the United Nations] in the presence of females under the age of 18." Id. at 94.

110. In his deposition, Epstein took the Fifth rather than answer the question:

"Have

you ever sexually abused children?" Id. at 95.

111. In his deposition, Epstein took the Fifth rather than answer the question: "Did you

have staff members that assisted you in scheduling appointments with underage females; that is,

females under the age of 18." Id. at 97-98.

112. In his deposition, Epstein took the Fifth rather than answer the question: "On how

many occasions did you solicit prostitution." Id. at 102.

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113. In his deposition, Epstein took the Fifth rather than answer the question: "How many minors have you procured for prostitution?" Id. at 104.

114. In his deposition, Epstein took the Fifth rather than answer the question:

"Have

you ever coerced, induced or enticed any minor to engage in any sexual act with you?" Id. at

107.

115. In his deposition, Epstein took the Fifth rather than answer the question: "How many times have you engaged in fondling underage females?" Id. at 108.

116. In his deposition, Epstein took the Fifth rather than answer the question: "How many times have you engaged in oral sex with females under the age of 18?" Id. at

110.

117. In his deposition, Epstein took the Fifth rather than answer the question: "Do you

have a personal sexual preference for children?" Id. at 111-12.

118. In his deposition, Epstein took the Fifth rather than answer the question:

"Your

Complaint at page 27, paragraph 49, says that 'RRA and the litigation team took an emotionally

driven set of facts involving alleged innocent, unsuspecting, underage females and a Palm Beach

billionaire, and sought to turn it into a goldmine,' end of quote. Who is the Palm Beach

billionaire referred to in that sentence?" Id. at 112-13.

119. In his deposition, Epstein took the Fifth rather than answer the question: "Who are

the people who are authorized to make payment [to your lawyers] on your behalf?" Id. at 120.

120. In his deposition, Epstein took the Fifth rather than answer the question: "Is there

anything in L.M.'s Complaint that was filed against you in September of 2008 which you

contend to be false?" Id. at 128.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November

, 2010 a copy of the foregoing has been

served via Fax and U.S. Mail to all those on the attached service list.

Jack Scarola

DECLARATION IN SUPPORT OF PLAINTIFF'S REQUEST FOR PROTECTIVE ORDER

I, Jane Doe, the Plaintiff in this matter proceeding under a pseudonym, state as follows:

1. I am a competent adult over 18 years of age able to testify as to personal knowledge. The facts in this declaration are true and correct to the best of my knowledge, information, and belief, and I am competent to testify to them if called upon to do so.
2. I was subject to extreme sexual and physical abuse by the Defendants, including forcible rape, that took place at several parties of Defendant Epstein during the summer of 1994 in New York City at a residence used by Defendant Epstein. During this period, I was 13 years old.
3. More particularly, I traveled by bus to New York City in June 1994 in the hope of starting a modeling career. I went to several modeling agencies but was told that I needed to put together a modeling portfolio before I would be considered. I then went to the Port Authority in New York City to start to make my way back home. There I met a woman who introduced herself to me as She told me about the parties and said that, if I would join her at the parties, I would be introduced to people who could get me into the modeling profession, also told me I would be paid for attending.
4. The parties were held at a New York City residence that was being used by Defendant Jeffrey Epstein. Each of the parties had other minor females and a number of guests of Mr. Epstein, including Defendant Donald Trump at four of the parties I attended. I understood that both Mr. Trump and Mr. Epstein knew that I was 13 years old.
5. Defendant Trump had sexual contact with me at four different parties in the summer of 1994. On the fourth and final sexual encounter with Defendant Trump, Defendant Trump tied me to a bed, exposed himself to me, and then proceeded to forcibly rape me. During the course of this savage sexual attack, I loudly pleaded with Defendant Trump to stop but he did not. Defendant Trump responded to my pleas by violently striking me in the face with his open hand and screaming that he would do whatever he wanted.
6. Immediately following this rape, Defendant Trump threatened me that, were I ever to reveal any of the details of Defendant Trump's sexual and physical abuse of me, my family and I would be physically harmed if not killed.

7. Defendant Epstein had sexual contact with me at two of the parties that summer. On the second occasion involving Defendant Epstein, Defendant Epstein forced himself upon me and proceeded to rape me anally and vaginally despite my loud pleas to stop. Defendant Epstein then attempted to strike me about the head with his closed fists while he angrily screamed at me that he, Defendant Epstein, should have been the one who took my virginity, not Defendant Trump, before I finally managed to break away from Defendant Epstein.

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8. Immediately following this rape, just like Defendant Trump, Defendant Epstein threatened me

not to ever reveal any of the details of Defendant Epstein's sexual and physical abuse of me or else my family and I would be physically harmed if not killed.

9. Both Defendants had let me know that each was a very wealthy, powerful man and indicated

that they had the power, ability and means to carry out their threats. Indeed, Defendant Trump stated

that I shouldn't ever say anything if I didn't want to disappear like , a 12-year-old female that was

forced to be involved in the third incident with Defendant Trump and that I had not seen since that third incident, and that he was capable of having my whole family killed.

10. The duress imposed on me by Defendants not to ever reveal any of the details of the sexual and

physical abuse caused to me by Defendants has not terminated and the fear it has instilled in me has not

subsided. Unfortunately, making matters worse for me, I was subjected to daily painful reminders of

the horrific acts of Defendant Trump via mass media coverage of him starting last summer that, over a

short period of time, became continuous and unavoidable.

11. The duress had prevented me from starting litigation before this year. However, as soon as I

surfaced, I received threats. More specifically, shortly after my first complaint was filed in California on

April 26, 2016, I started receiving threatening phone calls on a cell phone I then owned. The calls were

never for more than 20 seconds or so before they hung up and they were always from a blocked or

unavailable phone number according to my caller ID feature. Since I changed phone numbers, the

threatening calls have completely stopped.

12. This litigation involves matters that are highly sensitive and of a personal nature, and I believe

that identification of me would pose a risk of retaliatory physical harm to me and

to others.

13. I have no reason to believe that the Defendants' threats have ever been lifted or will ever be

lifted and so I request that the Court issue an order protecting me and my family from harm and

harassment by the Defendants.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: June 18, 2016

ne Doe, a pseudonym

HOUSE OVERSIGHT 025940

JANE DOE, proceeding under a pseudonym,
v.
Plaintiff,
DONALD J. TRUMP and
JEFFREY E. EPSTEIN,
Defendants.

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Case No.:
JURY TRIAL DEMANDED
COMPLAINT FOR RAPE, SEXUAL MISCONDUCT, CRIMINAL SEXUAL ACTS,
SEXUAL ABUSE, FORCIBLE TOUCHING, ASSAULT, BATTERY, INTENTIONAL
AND RECKLESS INFLICTION OF EMOTIONAL DISTRESS, DURESS, FALSE
IMPRISONMENT, AND DEFAMATION

Plaintiff Jane Doe, proceeding under a pseudonym, brings this action against Donald J.

Trump and Jeffrey E. Epstein, and alleges that:

PARTIES

1. Plaintiff is an individual residing in and a citizen of the State of California.
2. Upon information and belief, Defendants Donald J. Trump and Jeffrey E. Epstein each reside in this District and are citizens of the State of New York.

JURISDICTION AND VENUE

3. Plaintiff is a citizen of the State of California for purposes of diversity jurisdiction under 28 U.S.C. § 1332.

4. Defendants are citizens of the State of New York for purposes of diversity jurisdiction under 28 U.S.C. § 1332.

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5. This Court has original subject matter jurisdiction with respect to this action pursuant to 28 U.S.C. § 1332 as there exists complete diversity of citizenship between Plaintiff

and Defendants and the amount in controversy exceeds Seventy Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

6. Defendants are each subject to the jurisdiction of this Court pursuant to 28 U.S.C.

§ 1332 with proper venue pursuant to 28 U.S.C. § 1391 as both defendants are residents of

and/or are domiciled in this district and the events giving rise to the claims occurred in this district.

RAPE, SEXUAL MISCONDUCT, CRIMINAL SEXUAL ACTS, SEXUAL ABUSE, FORCIBLE TOUCHING, ASSAULT, BATTERY, INTENTIONAL AND RECKLESS INFLICTION OF EMOTIONAL DISTRESS, DURESS, AND FALSE IMPRISONMENT

7. Plaintiff was subject to acts of rape, sexual misconduct, criminal sexual acts, sexual abuse, forcible touching, assault, battery, intentional and reckless infliction of emotional

distress, duress, false imprisonment, and threats of death and/or serious bodily injury by the

Defendants that took place at several parties during the summer months of 1994. The parties

were held by Defendant Epstein at a New York City residence that was being used by Defendant

Epstein at 9 E. 71st St. in Manhattan. During this period, Plaintiff was a minor of age 13 and

was legally incapable under New York law of consenting to sexual intercourse and the other

sexual contacts detailed herein. NY Penal L § 130.05(3)(a). The rapes in the first, second, and

third degrees; sexual misconduct; criminal sexual acts in the first, second, and third degrees;

sexual abuse in the first, second, and third degrees; and forcible touching (and, on information

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and belief, predatory sexual assault) detailed herein are unlawful under New York law, e.g., NY

Penal L § 130.20-130.52, and 130.55-130.65 (and, on information and belief, 130.95) and

constitute the torts of, inter alia, assault, battery, false imprisonment, and intentional or reckless

infliction of emotional distress, including threats of force and serious bodily harm, under New

York law. Declaration of Plaintiff Jane Doe, Exhibit A hereto; Declaration of Tiffany Doe,

Exhibit B hereto. Jane Doe and Tiffany Doe are each pseudonyms as each woman wishes anonymity. Tiffany Doe, a witness, was an employee of Defendant Epstein. Exh. B.

8. Courts have discretion to allow proceeding anonymously where the need for privacy outweighs the public's interest in knowing their identity and any prejudice to the

defendants. Sealed Plaintiff v. Sealed Defendant, 537 F.3d 185, 189 (2d Cir. 2008). This

litigation involves matters that are highly sensitive and of a personal nature, and identification of

Plaintiff would pose a risk of retaliatory physical harm to her and to others. Exh. A. All of the

ten factors that the Second Circuit articulated as relevant to this analysis favor

anonymity,
especially factors 1-4, 7, and 10 (e.g., factors one and two: "whether the litigation involves matters that are 'highly sensitive and [of a] personal nature,'" and "'whether identification poses a risk of retaliatory physical or mental harm to the ... party [seeking to proceed anonymously] or even more critically, to innocent non-parties'").), or are neutral with respect to anonymity.

Protecting Plaintiff's anonymity is also appropriate as she is a rape victim.

9. Plaintiff was enticed by promises of money and a modeling career to attend a series of parties, with other similarly situated minor females, held at a New York City residence

that was being used by Defendant Jeffrey Epstein. At least four of the parties were attended by

Defendant Trump. Exhs. A and B. On information and belief, by this time in 1994, Defendant

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Trump had known Defendant Epstein for seven years (New York, 10/28/02), and knew that

Plaintiff was then just 13 years old. Exhs. A and B.

10. Defendant Trump initiated sexual contact with Plaintiff at four different parties.

On the fourth and final sexual encounter with Defendant Trump, Defendant Trump tied Plaintiff

to a bed, exposed himself to Plaintiff, and then proceeded to forcibly rape Plaintiff. During the

course of this savage sexual attack, Plaintiff loudly pleaded with Defendant Trump to stop but

with no effect. Defendant Trump responded to Plaintiff's pleas by violently striking Plaintiff in

the face with his open hand and screaming that he would do whatever he wanted. Exhs. A and

B.

11. Immediately following this rape, Defendant Trump threatened Plaintiff that, were she ever to reveal any of the details of the sexual and physical abuse of her by Defendant Trump,

Plaintiff and her family would be physically harmed if not killed. Exhs. A and B.

12. Defendant Epstein had sexual contact with Plaintiff at two of the parties. The second sexual encounter with Defendant Epstein took place after Plaintiff had been raped by

Defendant Trump. Defendant Epstein forced himself upon Plaintiff and proceeded to rape her

anally and vaginally despite her loud pleas to stop. Defendant Epstein then attempted to strike

Plaintiff about the head with his closed fists while he angrily screamed at Plaintiff that he,

Defendant Epstein, rather than Defendant Trump, should have been the one who took Plaintiff's

virginity, before Plaintiff finally managed to break away from Defendant Epstein.
Exhs. A and

B.

13. The threats of violence against Plaintiff and her family continued, this time from

Defendant Epstein, who again reiterated that Plaintiff was not to reveal any of the details of his

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sexual and physical abuse of her or else, specifically, Plaintiff and her family would be seriously

physically harmed, if not killed. Exhs. A and B.

14. While still under threats of physical harm by coming forward and having no reason to believe that the threats have ever been lifted or would ever be lifted, Plaintiff, who has

suffered from stress, emotional distress, mental pain and suffering, among other problems, ever

since the assaults, was subjected to daily painful reminders of the horrific acts of one of the

perpetrators, Defendant Trump, via mass media coverage of him starting on or about June 16,

2015 that, over a short period of time, became continuous and unavoidable. Exh. A.

15. As a direct and proximate result of the sexual assaults and rapes perpetrated by Defendants upon her, Plaintiff has suffered stress, emotional distress, and mental pain and

suffering, as well as adverse physical consequences.

16. As a direct and proximate result of the sexual assaults and rapes perpetrated by Defendants upon her, Plaintiff has suffered physical pain and suffering.

17. As a direct and proximate result of the sexual assaults and rapes perpetrated by Defendants upon her, Plaintiff has been subjected to public scorn, hatred, and ridicule and has

suffered threats against her life and physical safety.

18. As a direct and proximate result of the sexual assaults and rapes perpetrated by Defendants upon her, Plaintiff has incurred special damages, including medical and legal

expenses.

19. The sexual assaults and rapes perpetrated by Defendants upon Plaintiff were intentional acts.

20. The conduct of Defendants demonstrates willful, reckless and intentional conduct that raises a conscious indifference to consequences.

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21. At the appropriate time in this litigation, Plaintiff shall amend her complaint to

assert a claim for punitive damages against Defendants in order to punish Defendants for their

actions and to deter Defendants from repeating their conduct.

TOLLING OF STATUTE OF LIMITATIONS

22. Any statute of limitations applicable to rape, sexual misconduct, criminal sexual

acts, sexual abuse, forcible touching, assault, battery, intentional and reckless infliction of emotional distress, false imprisonment of a minor, if any, is tolled owing to the continuous and active duress imposed upon Plaintiff by Defendants that effectively robbed Plaintiff of her free will to commence legal action until the present time. Cullen v. Margiotta, 811 F.2d 698, 722 (2nd Cir.1987); Ross v. United States, 574 F. Supp. 536, 542 (S.D.N.Y. 1983). More particularly, Plaintiff was unrelentingly threatened by each Defendant that, were she ever to reveal any of the details of the sexual and physical abuse caused to her by Defendants, Plaintiff and her family would be physically harmed if not killed. The duress has not terminated and the fear has not subsided. The duress is an element of or inherent in the underlying causes of action complained of herein. The duress and coercion exerted by Defendants has been such as to have actually deprived Plaintiff of her freedom of will to institute suit earlier in time, and it rose to such a level that a person of reasonable firmness in Plaintiff's situation would have been unable to resist. Exhs. A and B.

23. Both Defendants let Plaintiff know that each was a very wealthy, powerful man and indicated that they had the power, ability and means to carry out their threats. Indeed, Defendant Trump stated that Plaintiff shouldn't ever say anything if she didn't want to disappear like Maria, a 12-year-old female that was forced to be involved in the third incident with

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Defendant Trump and that Plaintiff had not seen since that third incident, and that he was

capable of having her whole family killed. Exhs. A and B.

24. The duress had prevented Plaintiff from starting litigation before this year. However, as soon as she surfaced, she received threats. More specifically, shortly after her first

complaint was filed in California on April 26, 2016, she started receiving threatening phone calls

on her cell phone. Exh. A.

25. Defendants are equitably estopped from arguing that any statute of limitations has

not been tolled as Defendants wrongfully forced Plaintiff to refrain from timely commencing this

action by threats, duress, and other misconduct. Exhs. A and B.

26. Moreover, this action has been brought before the facts giving rise to the estoppel

have ceased to be operational (i.e., while still under threats of physical harm by

coming forward

and having no reason to believe that the threats have ever been lifted or would ever be lifted) and

since Plaintiff has decided to seek redress at this time, Plaintiff seeks an order of protection in

favor of Plaintiff and all associated with her so as to protect them from harm and harassment

from Defendants and their agents and associates. Exh. A.

DEFAMATION

27. On information and belief, on or about April 28, 2016, Defendant Trump provided the following statement to American Media, Inc. and/or Radar Online LLC for publication on at least their website RadarOnline.com regarding Plaintiff's complaint ED CV 16-

797-DMG (KSx) filed in the United States District Court for the Central District of California:

"The allegations are not only categorically false, but disgusting at the highest level and clearly

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framed to solicit media attention or, perhaps, are simply politically motivated.

There is

absolutely no merit to these allegations. Period." The statement provided for publication by

Defendant Trump was published by said website and has been republished elsewhere in whole or

in part numerous times (and similar statements of an attorney for Defendant Trump were also

published). The statement provided for publication by Defendant Trump and that was published

by said websites is false as it pertains to Plaintiff.

28. The published statement is libelous on its face, and clearly exposes Plaintiff to

hatred, contempt, ridicule and obloquy.

29. As a proximate result of the above-described publication, Plaintiff has suffered loss of her reputation, shame, mortification, and injury to her feelings, all to her damage in an

amount to be established by proof at trial.

30. The above-described publication was not privileged because it was published by Defendant Trump with malice, hatred and ill will toward Plaintiff and the desire to injure her.

31. As a direct and proximate result of Defendant Trump's defamation of Plaintiff, Plaintiff has been subjected to public scorn, hatred, and ridicule and has suffered other injury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants and for the following relief:

A. That judgment be entered against Defendants for special damages, compensatory damages, and punitive damages in an amount which shall be shown to be reasonable and just by

the evidence and in excess of Seventy Five Thousand Dollars (\$75,000.00), exclusive

of interests
and costs;

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B. That all costs of this action be assessed against Defendants, including all reasonable attorney's fees, costs and expenses of this action;

C. That an order of protection in favor of Plaintiff and all associated with her be issued so as to protect them from harm and harassment from Defendants and their agents and associates; and

D. Such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff demands a trial by jury of all issues properly triable by jury in this action.

Respectfully submitted,

Dated: June 20, 2016

By: /s/ Thomas Francis Meagher

Thomas Francis Meagher

SDNY Bar Code TM6707

One Palmer Square

Princeton, New Jersey 08542

Telephone: (609) 558-1500

tmeagher@thomasfmeagheresq.com

ATTORNEY FOR PLAINTIFF

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