

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and
PAUL G. CASSELL,

Plaintiffs/Counterclaim Defendants,

vs.

ALAN M. DERSHOWITZ,

Defendant/Counterclaim Plaintiff.

**DEFENDANT/COUNTERCLAIM PLAINTIFF ALAN M. DERSHOWITZ'S
REPLY TO PLAINTIFFS/COUNTERCLAIM DEFENDANTS'
RESPONSE TO MOTION TO COMPEL**

Defendant/Counterclaim Plaintiff ALAN M. DERSHOWITZ ("Dershowitz"), through counsel, hereby files his Reply to the Response filed by Plaintiffs/Counterclaim Defendants' BRADLEY J. EDWARDS ("Edwards") and PAUL G. CASSELL ("Cassell") (together, "Plaintiffs") in opposition to Dershowitz's Motion to Compel Production of Documents and Complete Responses to Interrogatories (the "Motion to Compel").¹

INTRODUCTION

At the outset of their Response, Plaintiffs spend several pages attempting to document at

¹ At issue are Plaintiffs/Counterclaim Defendants' discovery responses and objections in Dershowitz's Motion to Compel, as well as Edwards's Objection to Request No. 2 in Response to Dershowitz's Second Set of Document Requests and Cassell's Objection to Request No. 2 in Response to Dershowitz's Third Set of Document Requests, per Dershowitz's Amended Notice of Hearing dated September 10, 2015. Plaintiffs served these additional discovery responses after Dershowitz's Motion to Compel had been filed with the Court but maintain, in part, the same objections. Dershowitz therefore added them on to the presently scheduled hearing for purposes of efficiency, as opposed to preparing an entirely new amended motion.

length their discovery efforts. It is undisputed that Edwards and Cassell have filed responses to Dershowitz's discovery requests and *commenced* their production of documents. However, Edwards and Cassell are not the triers of fact who have authority to decide what is relevant, permissible, and proper discovery, through their own self-serving definition of "responsiveness." As set forth in Dershowitz's Motion to Compel, Plaintiffs' interrogatory responses and document production are incomplete, with no date certain as to when they will be completed. Moreover, Plaintiffs have asserted objections that have been waived or lack a sufficient basis in law or fact.

SUMMARY OF REPLY ARGUMENT

1. *The Attorney-Client Privilege Has Been Waived.*² Plaintiffs argue in their Response that they have properly asserted the attorney-client privilege in response to Dershowitz's discovery requests and that Dershowitz's reliance on the "at issue" waiver doctrine is misplaced. *See* Response, pp. 3-9. In support of this argument, Plaintiffs contend that they (as counsel) cannot waive a privilege that belongs to their client, [REDACTED] f/k/a Jane Doe No. 3 ("[REDACTED]").³ This argument fails for several reasons. *First*, [REDACTED] herself has waived the privilege by making repeated and voluntary statements about her allegations about being a "sex

² Plaintiffs filed a privilege log in this lawsuit that broadly and only categorically asserts the attorney-client and work product privileges. A copy of Plaintiffs' First Privilege Log is attached as **Exhibit A**. Until Plaintiffs produce an itemized privilege log, Dershowitz cannot determine which particular documents are being withheld, let alone other relevant information about the withheld documents (*e.g.*, date, author, subject matter). Because Dershowitz is not in a position to tailor his arguments to specific assertions of privilege, Dershowitz addresses the asserted privileges both broadly and categorically, as Plaintiffs have done. Dershowitz also filed with the Court a Motion for Finding of Waiver Based on Plaintiffs' Failure to Provide a Privilege Log or, in the alternative, to Compel Plaintiffs to Provide an Itemized Privilege Log, which remains pending. If the Court were to grant said Motion first, the Court's ruling may moot the subject Motion to Compel, in full or in part, with regard to privilege objections – at least, for the time being.

³ At a recent public deposition in this case, [REDACTED] given name was used on multiple occasions in the presence of her counsel, who did not raise any objection. [REDACTED] has waived any purported "privacy interest" in proceeding anonymously.

slave” who was sexually trafficked by Jeffrey Epstein (“Epstein”) to his purported associates. *Second*, Florida law is clear that an attorney’s actions can result in a waiver of the client’s privilege, even where those actions are not authorized by the client. As set forth in the Motion to Compel, Plaintiffs have waived the attorney-client privilege for their communications with ██████ by filing this defamation action and placing at issue the veracity of ██████ allegations against Dershowitz and their investigation into same. Plaintiffs’ own discovery responses and testimony have confirmed that they will rely on their communications with ██████ to attempt to prevail on their claims and defeat Dershowitz’s affirmative defenses, meaning that such communications are *inextricably merged* with this lawsuit. Upholding Plaintiffs’ assertion of the attorney-client privilege in these circumstances would result in nothing more than the concealment of the truth. Plaintiffs’ objections on the basis of the attorney-client privilege should be overruled.

2. *Plaintiffs Have Waived Their Right To Rely On The Work Product Doctrine, And Dershowitz Has In Any Event Established A Need For The Withheld Information.*⁴

Plaintiffs argue that Dershowitz has cited no authority and has not met his burden to show that Plaintiffs’ assertion of the work product doctrine should be overcome. Plaintiffs are again mistaken. Dershowitz has identified specific work product that he needs to defend this case and that cannot be obtained from another source. Moreover, Plaintiffs (the holders of the protection) have also waived their right to rely on the work product doctrine. Dershowitz is therefore entitled to the requested discovery.

3. *Plaintiffs’ Remaining Objections Must Be Overruled.* Plaintiffs represent that they have produced what they deem to be relevant and admissible discovery and have withheld

⁴ See *supra*, fn. 2.

what they contend is irrelevant, inadmissible, and/or privileged discovery. Again, Plaintiffs are in error. *First*, it is clear from a review of Plaintiffs' production as well as Plaintiffs' actions in conducting discovery that their production is incomplete and unfinished. *Second*, Plaintiffs' general and broad references to thousands of pages of public litigation documents (including non-substantive documents like notices of hearing, notices of deposition, etc.) in response to Dershowitz's very specific discovery requests are insufficient. Plaintiffs cannot compel Dershowitz to go on a fishing expedition. *Third*, discovery requests directed at Plaintiffs' and ██████ bias, intent, motivation, and credibility seek information that is directly relevant and subject to production. For these reasons and as set forth in Dershowitz's Motion to Compel, Plaintiffs' arguments fail.

4. In sum, the Court should (a) overrule Plaintiffs' objections to the discovery requests, including in particular, those asserted on the basis of attorney-client privilege and work product doctrine; (b) compel Plaintiffs to provide better answers to interrogatories and produce all responsive documents in a timely manner; and (c) order Plaintiffs, upon completion of their document production, to state that they have, in fact, completed production.

REPLY ARGUMENT

I. Communications between Plaintiffs and ██████ prior to the formation of the attorney-client relationship in March 2014 are not protected by the attorney-client privilege.

As an initial matter, any communications between Plaintiffs and ██████ that pre-date the formation of the attorney-client relationship in March 2014 are not privileged. In their privilege log – which Plaintiffs served on Dershowitz after the filing of the Motion to Compel – Plaintiffs indicate that they began representing ██████ March 2014. *See Ex. A.* Plaintiffs' assertion of the attorney-client privilege as to communications with ██████ prior to March 2014 should

therefore be overruled, and Plaintiffs should be compelled to produce same.⁵

II. The attorney-client privilege between Plaintiffs and ██████████ has been waived.

In their Response, Plaintiffs maintain that the attorney-client privilege has not been waived with respect to their communications with ██████████ for two primary reasons: (1) Plaintiffs, as counsel, cannot waive the attorney-client privilege, which is owned by ██████████ and (2) the elements of the at issue doctrine have not been established. Both of these arguments fail.

a. ██████████ waived the attorney-client privilege through her voluntary public statements.

Assuming – contrary to established Florida law, as discussed below – that the attorney-client privilege can be waived only by the client, ██████████ has clearly waived any privilege for her communications with Plaintiffs relating to her experiences as a “sex slave.” On December 30, 2014, Plaintiffs filed a pleading in a federal proceeding titled “Jane Doe #3 and Jane Doe #4’s Motion Pursuant to Rule 21 for Joinder in Action” (the “Joinder Motion”), on behalf of their client ██████████. In the Joinder Motion, Plaintiffs and ██████████ alleged that “[Jeffrey] Epstein [] sexually trafficked the then-minor Jane Doe [#3], making her available for sex to politically-connected and financially-powerful people.” In several paragraphs that have since been ordered stricken from the record by United States District Judge Kenneth Marra as “lurid” allegations that were “unnecessary,” “immaterial,” and “impertinent,” the Joinder Motion alleged that non-party Jeffrey Epstein (“Epstein”) required ██████████ to have sexual relations with Dershowitz in

⁵ To the extent that Plaintiffs contend that such communications are protected by a joint defense and/or common interest privilege, that privilege has been waived for the reasons discussed in Section II. Likewise, to the extent that Plaintiffs contend that such communications are protected by the work product doctrine, that protection also has been waived, as set forth in Section III.

certain specific locations, among other allegations of criminal conduct by Dershowitz.⁶ [REDACTED] subsequently submitted multiple sworn affidavits repeating the allegations against Dershowitz, which likewise have been stricken from the record by Judge Marra as being “unnecessary,” “immaterial,” and “impertinent.”

Although the Joinder Motion marked the first time that Plaintiffs and [REDACTED] publicly accused Dershowitz of sexual misconduct, [REDACTED] previously made repeated and voluntary public statements regarding her allegations of sexual misconduct involving Epstein. In particular:

- **[REDACTED] interviews with the Press.** On March 5, 2011 (almost four years prior to the Joinder Motion), [REDACTED] gave an interview to the *Daily Mail*, a British tabloid publication, in which she described in detail how she was purportedly recruited by Epstein for sexual exploitation. *See* Daily Mail Article dated March 5, 2011, attached as **Exhibit B**. According to the *Daily Mail*, [REDACTED] was exceptionally descriptive in the interview; the tabloid noted that “for reasons of taste, not all of the details [provided by Jane Doe No. 3] can be included here.” *See* **Ex. B**.
- **[REDACTED] interviews with Counsel.** On April 7, 2011, [REDACTED] was interviewed by Edwards and Plaintiffs’ counsel of record in this case, Jack Scarola (“Scarola”). *See* Transcript of Interview of [REDACTED] dated April 7, 2011, attached as **Exhibit C**. The interview focused on [REDACTED] account of being purportedly sexually abused and sexually trafficked by Epstein, including to Epstein’s friends. *Id.* Neither Edwards nor Scarola were [REDACTED] counsel at the time. *See id.*, pp. 1, 7; *see also* **Ex. A**,

⁶ In light of Judge Marra’s order, Dershowitz does not attach hereto any of the documents that contain or reference the stricken allegations. A motion for leave to file the relevant documents under seal will be filed separately.

Privilege Log (asserting that the attorney-client relationship between Plaintiffs and ██████ began in March 2014). In a portion of one of her affidavits in the federal proceeding that has since been stricken from the record by Judge Marra, ██████ cited this interview with Scarola and Edwards in support of her request to join that lawsuit as a plaintiff.⁷

- **██████ Diary Released to the Press.** On January 13, 2015, Radar Online published excerpts from ██████ personal diary that purportedly recount ██████ experiences meeting Epstein in September 1998 and then being one of Epstein’s “sex slaves” for several subsequent years. *See* Daily Mail Article dated January 15, 2015, attached as **Exhibit D**.⁸ The published excerpts – which presumably were released by ██████ the online publication, either directly or indirectly – depict explicit instances of purported sexual misconduct. *See* **Ex. D**.
- **██████ Statements to Numerous Other Third Parties.** ██████ also has publicly discussed her allegations of sexual abuse and sexual trafficking by Epstein and his purported associates on numerous occasions with third parties who are not her attorneys, including but not limited to former boyfriends (Anthony Figueroa and Philip Guderyon), the FBI, and additional journalists. *See, e.g., Ex. C*, pp. 17-18, 21; January 8, 2015 Inside Edition Report by Deborah Norville, interviewing Mr. Figueroa, the unverified transcript of which is attached as **Exhibit E** (“Q: Did she ever mention to you the lawyer Alan Dershowitz?; A: ██████ had never mentioned anything about

⁷ As discussed below, Edwards also disclosed a redacted version of the transcript of the interview with ██████ in the civil litigation styled *Epstein v. Edwards*.

⁸ Dershowitz states “purportedly” since excerpts of the diary are imaged in media articles, but the diary has not been produced by Plaintiffs in this case.

them having sex or brought up anything like that.”); Daily Mail Article dated March 2, 2015, attached as **Exhibit F**.

• **Public Suit Against Ghislaine Maxwell.** Most recently, on September 21, 2015, [REDACTED] commenced an action against Ghislaine Maxwell (“Maxwell”) in the United States District Court for the Southern District of New York. *See* Roberts/Maxwell Complaint dated September 21, 2015, attached as **Exhibit G** (the “Maxwell Action”). In her complaint in the Maxwell Action, [REDACTED] alleges that she was sexually abused and sexually trafficked by Epstein and Maxwell between 1999 and 2002 and that Maxwell defamed her by disputing [REDACTED] allegations. *See id.*

In sum, [REDACTED] as – as an adult – voluntarily and repeatedly discussed her alleged experiences as one of Epstein’s “sex slaves,” including her purported experiences being trafficked to Epstein’s associates. In that regard, [REDACTED] has also publicly disclosed and relied upon her conversation with Edwards and Scarola to support when she first came forward with her allegations of being a “sex slave.” In making these voluntary disclosures, [REDACTED] has waived her right to assert the attorney-client privilege as to matters concerning the same subject matter, *i.e.*, her experiences as a “sex slave” who was trafficked to Epstein’s associates. *See Hoyas v. State*, 456 So.2d 1225, 1229 (Fla. 3d DCA 1984) (as a matter of fairness, a client’s voluntary and self-serving testimony as to a specific communication with an attorney results in a waiver as to all other communications to the attorney on the same subject matter). Thus, even if Plaintiffs were correct that only the client can waive the attorney-client privilege (which they are not), [REDACTED] herself has waived the privilege on multiple occasions.

b. Plaintiffs waived the attorney-client privilege by bringing this defamation action and placing at issue the veracity of [REDACTED] allegations against

Dershowitz and their investigation into those allegations.

i. Plaintiffs, as counsel, can waive [REDACTED] attorney-client privilege.

Plaintiffs are incorrect in arguing that [REDACTED] as the privilege holder, is the only person who can waive the attorney-client privilege. Florida law recognizes that – although the client owns the privilege – an attorney’s purposeful actions can also result in a waiver of the client’s privilege, even where (unlike here) the attorney’s actions were unauthorized. *See, e.g., Hamilton v. Hamilton Steel Corp.*, 409 So. 2d 1111, 1114 (Fla. 4th DCA 1982) (where the attorney who represented multiple defendants publicly announced the details of a settlement at a court hearing, the attorney-client privilege had been waived as to all matters relating to the negotiation of the settlement, even though some of the attorney’s clients later attempted to invoke privilege); *Stevenson v. Stevenson*, 661 So. 2d 367, 369-70 (Fla. 4th DCA 1995 (wife could not claim privilege where her attorney’s secretary had waived the privilege by voluntarily disclosing certain information to the husband’s attorney). *Cf. Abamar Hous. & Dev., Inc. v. Lisa Daly Lady Decor, Inc.*, 698 So. 2d 276, 278 (Fla. 3d DCA 1997) (outlining the circumstances in which counsel’s inadvertent production of documents can result in a waiver of the attorney-client privilege). Plaintiffs’ own actions in filing the Joinder Motion and bringing this defamation action are therefore sufficient to give rise to a finding of waiver because, as discussed below, their actions have placed their communications with [REDACTED] directly at issue.

ii. Plaintiffs waived the attorney-client privilege by placing the privileged matters “at issue,” as *inextricably merged with and directly relevant to this lawsuit*.

Plaintiffs incorrectly claim in their Response that Dershowitz has not met the elements of at issue waiver doctrine. The tri-part test for determining whether the at issue waiver doctrine applies is:

(1) assertion of the privilege was a result of some affirmative act, ***such as filing suit***, by the asserting party; (2) through this affirmative act, the asserting party put the protected information at issue by making it relevant to the case; and (3) application of the privilege would have denied the opposing party access to information vital to his defense.

Pitney-Bowes, Inc. v. Mestre, 86 F.R.D. 444, 447 (S.D. Fla. 1980) (quoting *Hearn v. Rhay*, 68 F.R.D. 574, 581 (E.D. Wash. 1975)) (emphasis added); *see also Savino v. Luciano*, 92 So. 2d 817, 819 (Fla. 1957) (“[W]hen a party has filed a claim, based upon a matter ordinarily privileged, the proof of which will necessarily require that the privileged matter be offered in evidence, [the Florida Supreme Court has held] that he has waived his right to insist, in pretrial discovery proceedings, that the matter is privileged.”). As the court in *Hearn* put it:

In an ordinary case the obstruction is not likely to be great, for attorney-client communications are usually incidental to the lawsuit, notwithstanding their possible relevance, and other means of proof are normally available. In this case, however, the content of defendant’s communications with their attorney is ***inextricably merged*** with the elements of plaintiff’s case and defendants’ affirmative defense. These communications are not incidental to the case; they inhere in the controversy itself, and to deny access to them would preclude the court from a fair and just determination of the issues. To allow assertion of the privilege in this manner would pervert its essential purpose and transform it into a potential tool for concealment of unconstitutional conduct behind a veil of confidentiality. Under these circumstances, the benefit to be gained from disclosure far outweighs the resulting injury to the attorney-client relationship. The privilege should not apply.

Hearn, 68 F.R.D. at 582 (emphasis added); *see also Pitney-Bowes*, 86 F.R.D. at 447-48 (applying the *Hearn* test to hold that, by engaging in the affirmative act of filing suit, the plaintiff injected into “the very soul of this litigation” the attorney-client communications he sought to withhold and thus “waived the right to assert the attorney-client privilege with regard to these documents”).

Here, the three elements of the at issue doctrine have all been satisfied. *First*, Plaintiffs’ assertion of privilege is the direct result of their affirmative act in filing this action and alleging

that Dershowitz defamed them in his public responses to the false accusations of sexual misconduct leveled by Plaintiffs on [REDACTED] behalf in the Joinder Motion. *See* Compl. ¶ 17 (emphasis added). But for the filing of this defamation lawsuit, Dershowitz would not have propounded the discovery requests in response to which Plaintiffs asserted the attorney-client privilege. The first prong in the tri-part test is satisfied. *See Pitney-Bowes*, 86 F.R.D. at 447.

Second, through Plaintiffs' affirmative act of filing this defamation action, Plaintiffs put the purportedly protected information "at issue" by making it directly relevant to the case. Plaintiffs allege that Dershowitz defamed them by "initiat[ing] a massive public media assault on the reputation and character of [Edwards] and [Cassell] *accusing them of intentionally lying in their filing*, of having leveled knowingly false accusations against [Dershowitz] *without ever conducting any investigation of the credibility of the accusations, and of having acted unethically ...*" – even though Dershowitz "knew [the filing in the Federal Action containing the allegations about Dershowitz] to be an entirely proper and well-founded pleading." *See* Compl. ¶ 17 (emphasis added). To prevail in this action, Plaintiffs must substantiate their allegations by (i) establishing that they conducted an investigation regarding the credibility of [REDACTED] allegations against Dershowitz, and show to what extent; and (ii) establishing that the allegations asserted against Dershowitz by [REDACTED] and Plaintiffs in the Joinder Motion were, in fact, "well-founded," such that they acted ethically in filing the Joinder Motion.

Plaintiffs have already demonstrated that they will necessarily rely on their communications with [REDACTED] to attempt to prevail on their defamation claim and defeat Dershowitz's affirmative defenses. For example, in their responses to Dershowitz's interrogatories, Plaintiffs answered that "with regard to when [REDACTED] has provided information related to [allegations against Dershowitz] to [Plaintiffs], [REDACTED] provided such information in

telephone calls with Brad Edwards beginning in 2011.” See **Exhibit H**. Similarly, at Cassell’s recent deposition where he was questioned about the factual basis for including [REDACTED] allegations against Dershowitz in the Joinder Motion, Cassell testified about a very small number of phone calls he had with [REDACTED] well as his review of the transcript of [REDACTED] 2011 interview with Scarola and Edwards. See Deposition Transcript Excerpt of Paul Cassell, Volume I, dated October 16, 2015, at 103:21-24, attached as **Exhibit I**. Thus, Plaintiffs’ own testimony shows that the communications they contend are privileged are not merely relevant, but actually go to the heart of, and are *inextricably merged* with, the elements of Plaintiffs’ claims and Dershowitz’s defenses. See *Hearn*, 68 F.R.D. at 582. Dershowitz has met the second prong.

Third, application of the privilege would deny Dershowitz access to information that is vital to his defense – the third prong in the tri-part test. To date, Plaintiffs have hidden behind the attorney-client privilege to selectively produce evidence regarding their conversations, emails, and/or interviews with [REDACTED]. As noted above, Plaintiffs have already relied on the 2011 interview of [REDACTED] by Scarola and Edwards as well as other telephone calls and meetings with [REDACTED] to support their claims, but contend that the details and content of these other communications with [REDACTED] (i.e., communications that could support Dershowitz’s defenses) are properly withheld as privileged. Plaintiffs should not be permitted to invoke privilege to preclude discovery and then later rely on the element of surprise when they pick and choose at trial which privileged evidence they wish to rely upon. Dershowitz is entitled to access information that is vital to his defense now, and the third prong has been met. See *Pitney-Bowes*, 86 F.R.D. at 447.

In sum, Dershowitz has met each and every element of the tri-part test for establishing an issue waiver. The communications and exchange of information between [REDACTED] and

Plaintiffs are not incidental to this case, but inhere to the subject controversy itself; to deny access to this information would preclude the Court from a fair and just determination of the issues. *See Hearn*, 68 F.R.D. at 582. It would also preclude Dershowitz from establishing his defenses, including but not limited to proving that his statements about Plaintiffs were all constitutionally protected expressions of opinion or truthful factual assertions. Upholding Plaintiffs' assertion of privilege would also allow Plaintiffs to continue to gather evidence months after the filing of the Joinder Motion on December 30, 2014, to attempt to support what otherwise was an inadequate investigation and shotgun filing, without Dershowitz being able to test the timing of Plaintiffs' receipt and review of that evidence. Plaintiffs cannot be allowed to use the attorney-client privilege or, as addressed below, the work product doctrine, as both a sword and a shield. Under these circumstances, the benefits to be gained from disclosure far outweigh the resulting injury to the attorney-client relationship. *Id.* at 582-583 ("[D]ue to the nature of this suit, which puts the legal advice defendants received directly in issue, the policy behind the privilege is outweighed by the necessity of disclosure and the privilege is inapplicable."). Plaintiffs' objections should be overruled, and they should be compelled to produce all responsive documents. *Id.* at 583 (the court ordered production of documents in addition to answers to interrogatories and depositions questions given waiver of attorney-client privilege, and because the documents were "at issue" in the case).

Plaintiffs' and [REDACTED] waiver of the right to assert the attorney-client privilege requires Plaintiffs to produce all responsive documents as well. *See Hearn*, 68 F.R.D. at 583 (the court ordered production of documents in addition to answers to interrogatories and depositions questions given waiver of attorney-client privilege, and because "at-issue" through affirmative defense). *See Hearn*, 68 F.R.D. at 583. No work product privilege remains. Nonetheless,

Plaintiffs have on separate grounds waived the asserted work product privilege as well.

III. Plaintiffs have waived their right to rely on the work product doctrine, and Dershowitz has in any event established a need for the information he seeks, which cannot be obtained from any other source.

Plaintiffs also maintain that the “at issue” doctrine does not apply to the work product doctrine, which is distinct from the attorney-client privilege in that its function is to protect counsel’s mental impressions. The latter point is not in dispute. However, given the factual circumstances and the manner in which Plaintiffs have asserted objections based on the work product doctrine, Plaintiffs are otherwise in error. Plaintiffs have waived their right to rely on the work product doctrine by voluntarily disclosing and relying on information they contend is protected by the work product doctrine. Moreover, the discovery that Dershowitz seeks is relevant, in need, and cannot be obtained by Dershowitz from another source. Plaintiffs’ work product objection should therefore be overruled and production compelled.

“Work product can be divided into two categories: ‘fact’ work product (i.e., factual information which pertains to the client’s case and is prepared or gathered in connection therewith), and ‘opinion’ work product (i.e., the attorney’s mental impressions, conclusions, opinions, or theories concerning his client’s case).” *State v. Rabin*, 495 So. 2d 257, 262 (Fla. Dist. Ct. App. 1986) (citing *In re Sealed Case*, 676 F.2d 793, 810-11 (D.C. Cir. 1982)). Although opinion work product is generally “nearly absolutely privileged,” fact work product is subject to discovery upon a showing of “need.” *Id.*; see also Fla. R. Civ. P. 1.280 (a party may obtain discovery of documents prepared in anticipation of litigation or for trial “upon a showing that the party seeking discovery has need of the materials in the preparation of the case and is unable without undue hardship to obtain the substantial equivalent of the materials by other means”).

Here, Dershowitz’s discovery requests are narrowly tailored to seek only the factual

information and documentation pertaining to [REDACTED] allegations against Dershowitz and [REDACTED] credibility (e.g., interview notes of [REDACTED] investigation into her credibility, efforts to verify her allegations of sexual misconduct and experiences as a “sex slave”, etc.). To the extent that such information is protected by the work product doctrine, that work product can be divided into two broad categories: (i) work product involved with Plaintiffs’ representation of [REDACTED] post-March 2014; and (ii) work product involved with Plaintiffs’ representation of certain non-parties (or themselves) in other litigation factually related to [REDACTED] and her allegations of sexual misconduct that occurred prior to the formation of the attorney-client relationship between Plaintiffs and [REDACTED] March 2014.

Plaintiffs – the owner of the work product protection, *see, e.g., Rabin*, 495 So.2d at 263 – have waived their right to rely on the work product doctrine as to both of these categories. As noted above, Plaintiffs interviewed [REDACTED] on April 7, 2011 about her experiences as a “sex slave.” *See Ex. C.* Although the transcript of the interview is labeled as “Privileged... and/or Work Product,” Edwards voluntarily chose to file the transcript in state court in the case of *Epstein v. Edwards*. *See* Plaintiffs’ Notice of Filing dated May 17, 2011, attached hereto as **Exhibit J**. Plaintiffs and [REDACTED] also disclosed the substance of this interview in a portion of one of [REDACTED] affidavits in the federal proceeding that has since been stricken from the record by Judge Marra. As a result of these voluntary disclosures, Plaintiffs have waived any right to rely on the work product doctrine to withhold documents relating to the subject matter of [REDACTED] interview. *See, e.g., Hoyas*, 456 So. 2d at 1229.

As to documents created after April 2014, Plaintiffs waived their right to rely on the work product doctrine through the filing of (i) the Joinder Motion and related [REDACTED] affidavits, and (ii) this defamation action, which places at issue the credibility of [REDACTED] allegations and their

investigation into same. As described above, the only way for Plaintiffs to meet their evidentiary burden here is by using information that might otherwise be protected by the work product doctrine – as again, it is all *inextricably merged*.

Even putting aside issues of waiver, Dershowitz has met his burden of establishing that the work product doctrine should be overcome here, as (a) he has a need for the materials that are encompassed by his discovery requests; and (b) such materials cannot be obtained by other means. *See* Fla. R. Civ. P. 1.280(b)(4). As to the first prong, the materials sought are highly relevant and pertinent. Plaintiffs are seeking to protect their conversations with [REDACTED] and related credibility assessments or follow-up investigation materials, if any, in conjunction with their pre-March 2014 interviews of her, which were conducted as part of other litigation either involving the Plaintiffs themselves or other third parties. Plaintiffs are also seeking to protect materials created after March 2014, which likewise are highly pertinent to the sufficiency of Plaintiffs' investigation of the credibility of [REDACTED] allegations and the ethical nature of Plaintiffs' actions, among other things. Indeed, Plaintiffs' assertions of irrelevance are belied by the questioning that occurred at Dershowitz's recent deposition, where Plaintiffs' counsel inquired in detail about the truth of [REDACTED] allegations that she had sex with Dershowitz on multiple occasions when she was a minor.

Dershowitz has no other means of obtaining this discovery. [REDACTED] and her present counsel, Boies, Schiller & Flexner LLP ("BSF"), are the two most obvious potential sources of information relating to the veracity of [REDACTED] allegations against Dershowitz and Plaintiffs' investigation into same. However, both of these non-parties have objected to the subpoenas issued to them by Dershowitz and have argued that they should be totally immune from

providing any discovery in this case.⁹ As to other non-parties who may have information relevant to [REDACTED] allegations and/or Plaintiffs' investigation, Plaintiffs only broadly and categorically assert the work product protection and have not identified the names of these individuals or any specific documents being withheld on this basis. Dershowitz is therefore unable to determine if another source or means is even available. Plaintiffs are the only viable source of the discovery that Dershowitz seeks, which is critical for Dershowitz's defenses.

For each of the foregoing reasons, Plaintiffs' argument fails. Plaintiffs have waived their right to rely on the work product doctrine. And, in any event, Dershowitz has met his burden of establishing that the work product should be overcome, as the information he seeks is relevant, in need, and cannot be obtained by Dershowitz from another source.

IV. Plaintiffs' Remaining Objections Should Be Overruled.

Plaintiffs have produced what they deem to be relevant and admissible discovery and have withheld what they contend is irrelevant, inadmissible, and/or privileged. Plaintiffs are attorneys – not the triers of fact. As set forth above and in Dershowitz's Motion to Compel, the requested discovery is unquestionably relevant. In supplement, Dershowitz further states:

First, it is clear from a review of Plaintiffs' production as well as Plaintiffs' actions in conducting discovery that their production is incomplete and unfinished. As a few examples:

- *BE-000115, Correspondence dated January 23, 2015*, attached as **Exhibit K**: Plaintiffs produced an e-mail that makes reference to a "freelance TV producer" who is "to be included on Jack Scarola's e-mail distribution list for the Dershowitz suit." Plaintiffs have not produced any e-mails or other correspondence directed to

⁹ As the Court is aware, [REDACTED] and BSF filed Motions to Quash or for a Protective Order in response to the subpoenas for testimony and/or for documents that Dershowitz served on those non-parties. A hearing on those motions is scheduled for November 2, 2015.

any “e-mail distribution list” of Scarola’s, or e-mails directly from Scarola that can be characterized as such.

- *BE-000111, Correspondence dated January 24, 2015*, attached as **Exhibit L**: Plaintiffs produced an e-mail that makes reference to “a couple zip files concerning [REDACTED] travel seen alongside Prince Andrew’s engagements.” Plaintiffs have not produced the zip files or the travel related documents, despite numerous requests by Dershowitz.¹⁰ There is no basis for asserting that these materials are irrelevant, as they go to the credibility of [REDACTED] allegations concerning Prince Andrew, which she made simultaneously with those concerning Dershowitz. There likewise is no basis for asserting that the materials are privileged, as it is apparent that a third party reporter was in possession of or created this responsive “zip file[]” which goes. *See Ex. L.*
- *BE-00029-31, Correspondence dated January 22, 2015*, attached as **Exhibit M**: Plaintiffs produced an e-mail that makes reference to an attachment, which is a .pdf titled “The Duke of York”. *See Ex. M.* No attachment has been produced. Relatedly, Plaintiffs have not produced *any* attachments to e-mails following the production of the e-mail itself.¹¹
- “*Blake-BBC-Email*” dated January 3, 2015, attached as **Exhibit N**: Plaintiffs produced an e-mail entitled “Blake-BBC-Email” on August 3, 2015 in supplemental response to Dershowitz’s production request. *See Ex. N.* Notably, this e-mail was

¹⁰ For that matter, Plaintiffs have not produced any documents concerning [REDACTED] purported travel alongside Dershowitz.

¹¹ Of course, some identifiable attachments to emails such as the defamation Complaint, Dershowitz reasonably understands are produced elsewhere and of record in this case.

only produced after Dershowitz – who was independently aware of its existence through a third party member of the media – demanded that Plaintiffs produce it. The subject line indicates that the e-mail provided was a “reply” to an e-mail from the recipient, Paul Blake; however, the original e-mail has not been produced. *See Ex. N.* It is also generally the case that Plaintiffs’ production of e-mails from the Searcy Denney firm were printed from the email inbox of Scarola’s assistant, Mary Pirrotta, and involved her as a sender or recipient. Despite request, Plaintiffs will not confirm that all of Scarola’s e-mails have been searched and produced.

Based on the above, it is clear that Plaintiffs’ production is incomplete. Plaintiffs also have not provided sufficient detail in their discovery responses to allow Dershowitz to know when their production will be complete. Counsel for Dershowitz has repeatedly asked Plaintiffs this question and to amend their discovery responses to document the same. This has not happened. Without identification or advisement, is there ever a known end? Plaintiffs must be compelled to complete their production, and when done, advise in their responses of the same.

Second, Plaintiffs cannot be permitted to rely on general and broad references to thousands of pages of public documents of record in other litigation in response to Dershowitz’s tailored discovery requests. Plaintiffs contend that Dershowitz has equal access to these litigation files (which are extensive and span many years), meaning that they have no obligation to produce the specific documents that are responsive to Dershowitz’s requests. But, one of the goals of Dershowitz’s discovery requests is to learn which of these documents Plaintiffs actually relied upon in their investigation into [REDACTED] allegations against Dershowitz. As it stands now, Plaintiffs’ responsive documents include notices of hearing, notices of deposition, and discovery motion practice, among other things, in unrelated litigation, which are clearly not responsive.

Dershowitz is not in a position to know which documents Plaintiffs used/reviewed, nor does he have an obligation to guess which documents Plaintiffs relied on. Plaintiffs should not be permitted to categorically respond and basically tell Dershowitz to “Go Fish.” Plaintiffs must be compelled to identify which specific documents from these other lawsuits are responsive to Dershowitz’s discovery requests.

Third, discovery directed at Plaintiffs’ and [REDACTED] bias, intent, motivation, and credibility are also highly relevant and subject to production. Plaintiffs have injected their credibility into this lawsuit through the filing of their defamation action – as they (along with [REDACTED]) are the three primary witnesses to their case. Dershowitz is entitled to cross-examine and address their credibility and bias. As set forth in his Motion to Compel, Dershowitz therefore is entitled to discovery regarding Plaintiffs’ fee agreement(s) with [REDACTED] as well as information relating [REDACTED] book, television, and movie deals, including any amount that [REDACTED] has paid for her media interviews and provision of documents to the media.

Plaintiffs unmistakably have not produced what is relevant and admissible discovery. Plaintiffs are not the triers of fact, and their arguments fail. Dershowitz is entitled to a defense and to discover information that may be used to cross-examine Plaintiffs and other key witnesses and attack their credibility.

V. Conclusion.

In conclusion, all three of the individuals involved in this action (Edwards, Cassell, and [REDACTED]) have waived the attorney-client privilege for their communications. [REDACTED] has voluntarily disclosed details of her purported experience as a “sex slave” in multiple fora, including by disclosing and relying on communications she had with Edwards. These voluntary disclosures have resulted in a waiver of [REDACTED] privilege as to all communications concerning

the same subject matter. Moreover, Plaintiffs – as [REDACTED] counsel – have likewise waived the attorney-client privilege by filing this litigation and placing at issue [REDACTED] allegations against Dershowitz and their investigation of same. Discovery has already shown that Plaintiffs will rely on their communications with [REDACTED] to establish their claims and defeat Dershowitz’s defenses. For the same reasons, Plaintiffs also have waived their right to rely on the work product doctrine. In any event, Dershowitz has met his burden of establishing that the work product doctrine should be overcome in these circumstances. Allowing Plaintiffs to rely on the work product doctrine and/or the attorney-client privilege in these circumstances would result in nothing more than the concealment of the truth and deny Dershowitz access to information that is vital to his defense.

Dershowitz is entitled to a complete production of responsive information. Plaintiffs’ general and broad references to public documents filed in other litigation in response to specific discovery requests are improper. Plaintiffs cannot compel Dershowitz to go on a fishing expedition. Also, discovery directed at Plaintiffs’ and [REDACTED]’s bias, intent, motivation, and credibility are directly relevant and subject to production. Plaintiffs’ arguments fail.

WHEREFORE, Defendant/Counterclaim Plaintiff, ALAN M. DERSHOWITZ, respectfully requests this Honorable Court enter an Order (a) overruling Plaintiffs’ objections to Dershowitz’s discovery requests; (b) compelling Plaintiffs to produce all documents responsive to Dershowitz’s First, Second and Third Sets of Document Requests in a timely manner, and state in any amended response when complete; (c) compelling Plaintiffs to provide complete responses to Dershowitz’s First Sets of Interrogatories in a timely manner, and again, state in any amended response when complete; and (d) such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ Thomas E. Scott

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Counsel for Alan M. Dershowitz

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by electronic mail (email) at email address: jer@scarolaw.com mar@scarolaw.com, [REDACTED]
[REDACTED] to: **Jack Scarola, Esq.**, Searcy Denney Scarola Barnhart & Shipley, P.A., Counsel for Plaintiff, 2139 Palm Beach Lakes Blvd., West Palm Beach, Florida 33409, and I electronically filed the foregoing with the Clerk of Broward County by using the Florida Courts eFiling Portal this 27th day of October, 2015 .

.
/s/ Thomas E. Scott
Thomas E. Scott, Esq.

EXHIBIT A

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT, IN
AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and PAUL G.
CASSELL,

Plaintiff,

vs.

ALAN M. DERSHOWITZ,

Defendant.

**FIRST PRIVILEGE LOG REGARDING DEFENDANT DERSHOWITZ'S FIRST SET
OF DOCUMENT REQUESTS TO BRADLEY J. EDWARDS AND PAUL G. CASSELL**

Plaintiffs, Bradley J. Edwards and Paul G. Cassell, by and through their undersigned attorneys and pursuant to Rule 1.280, Florida Rules of Civil Procedure, as well as other applicable Rules (including Florida State 90.502 and associated Rules of Evidence) hereby file this First Privilege Log to Defendant, Alan M. Dershowitz's, First Set of Document Requests dated February 11, 2015 to as follows:

2. All Documents Concerning Dershowitz's alleged "participation in Epstein's criminal conduct" referenced in paragraph 16 of the Complaint.

Mr. Edwards and Professor Cassell are asserting attorney-client privilege and the work product doctrine to withhold (or redact) responsive documents and communications that involve this action and *Does et al. v. United States*, Case No. 9:08-cv-80736-KAM (S.D. Fla.), as well as civil actions (filed or contemplated) in which they represented victims of Epstein and Dershowitz's sexual abuse, including women (who were minors at the time of the abuse) who will be identified in this pleading as Jane Doe 1, Jane Doe 2, Jane Doe 3, Jane Doe 4, and Jane Doe 5. Because this litigation involves multiple lawsuits that have spanned more than seven years, Mr. Edwards and Professor Cassell will not be logging these extensive communications and/or documents because doing so would be unduly burdensome and because the log itself would, in some cases, disclose the privileged or protected information.

Mr. Edwards and Professor Cassell are also asserting attorney-client privilege and the work product doctrine and the common interest privilege -- involving Mr. Edwards, Mr. Cassell, Jane Doe 1, Jane Doe 2, Jane Doe 3, Jane Doe 4, and Jane Doe 5 and/or one or more of the following individuals: (1) Jack Scarola and others at his firm involved in the rendition of legal

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services; (2) David Boies and Sigrid McCawley and others at their firm involved in the rendition of legal services; (3) Joni Jones and Joel Ferre and others in the Utah Attorney General's Office involved in the rendition of legal services; (4) John Morris, General Counsel at the University of Utah, and others at the University of Utah involved in the rendition of legal services. Mr. Edwards and Professor Cassell will not be logging these extensive communications and/or documents because doing so would be unduly burdensome and because the log itself would, in some cases, disclose the privileged or protected information.

The preparation of this privilege log has been hampered by the vagueness in the request, as well as by Dershowitz's failure to completely and timely produce information to which Edwards and Cassell are entitled which would help clarify the nature of the requests.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

10. All Documents Concerning drafts of any declaration or affidavit of Jane Doe #3.

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See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

14. All Documents Concerning Jane Doe #3's presence at the various locations named in Paragraphs 24-31 of the 2015 Jane Doe #3 Declaration on the particular dates and times when Dershowitz was also present.

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or	Attorney-Client; Work Product

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	Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

15. All Documents Concerning whether Dershowitz was present at the various locations named in Paragraphs 24-31 of the 2015 Jane Doe #3 Declaration on the particular dates and times when Jane Doe #3 alleges to have been present.

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or	Attorney-Client; Work Product

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	Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

16. All statements, written or recorded, that Plaintiffs or Jane Doe #3 have provided to anyone that reference Dershowitz by name.

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product

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8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

19. All Documents Concerning communications between You or anyone acting on Your behalf and anyone from, or acting on behalf of, any media outlet Concerning Dershowitz or this action, whether or not such communications were “on the record” or “off the record.”

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from	Attorney-Client; Work Product

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	others made in furtherance of the rendition of legal services to Jane Doe #5	
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20. All Documents Concerning any press release Concerning this action, the Joinder Motion, or Dershowitz, or Jane Doe #3.

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

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21. All Documents Concerning any assertion that Dershowitz was a “co-conspirator” with Epstein.

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

22. All Documents Concerning any assertion that Dershowitz negotiated the NPA for his own benefit.

See answer to request #2 above.

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Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

23. All Documents Concerning any actions allegedly taken by Prince Andrew, Duke of York, to influence the terms of the NPA.

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition	Attorney-Client; Work Product

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	of legal services to Jane Doe #2	
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

24. All Documents Concerning any request for the deposition of Dershowitz.

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product

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4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product
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25. All Documents Concerning any investigation of Dershowitz.

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

26. All notes of any investigation of Jane Doe #3's allegations against Dershowitz.

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

29. All Documents Concerning any actual or potential book, television, movie or other media deals Concerning Jane Doe #3's allegations about being a sex slave.

Preparation of this answer has been hampered by the exceedingly vague terms "potential" and "deal." Counsel are not aware of any actual book, television, movie or other media deals concerning Jane Doe #3's allegations about being a sex slave. Of course, any time anyone has had life experiences, it might be possible for them to write a book about it at some point in their life. In that light,

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

30. All Documents Concerning Your retainer agreement with Jane Doe #3.

See answer to request #2 above.

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	Description	Privileges Asserted
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product

31. All Documents Concerning any investigation of Jane Doe #3.

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

33. All Documents Concerning Your claim for damages in this action.

See answer to request #2 above.

Dates	Description	Privileges Asserted
1/15-present	Communications to/from Edwards and Cassell with Jack Scarola and with others made in furtherance of the rendition of legal services to Edwards and Cassell	Attorney-Client; Work Product

34. All Documents referred to or relied upon by Plaintiffs to prepare "Jane Doe #3 and Jane Doe #4's Motion Pursuant to Rule 21 for Joinder in Action," which was filed in the Federal Action as Docket Entry #279.

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from	Attorney-Client; Work Product

Edwards, Bradley vs. Dershowitz

Case No.: CACE 15-000072

Revised Answers To Defendant Dershowitz's First Set Of Document Requests
to Edwards and Cassell

	others made in furtherance of the rendition of legal services to Jane Doe #4	
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

35. All Documents referred to or relied upon by Plaintiffs to prepare the Complaint in this action.

See answer to request #2 above.

Dates	Description	Privileges Asserted
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #1 or to/from others made in furtherance of the rendition of legal services to Jane Doe #1	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #2 or to/from others made in furtherance of the rendition of legal services to Jane Doe #2	Attorney-Client; Work Product
3/14-present	Communications to/from either Edwards or Cassell or to/from Jane Doe #3 or to/from others made in furtherance of the rendition of legal services to Jane Doe #3	Attorney-Client; Work Product
8/10-present	Communications to/from either Edwards or Cassell to/from Jane Doe #4 or to/from others made in furtherance of the rendition of legal services to Jane Doe #4	Attorney-Client; Work Product
4/08-present	Communications to/from either Edwards or Cassell to/from Jane Doe #5 or to/from others made in furtherance of the rendition of legal services to Jane Doe #5	Attorney-Client; Work Product

Edwards, Bradley vs. Dershowitz

Case No.: CACE 15-000072

Revised Answers To Defendant Dershowitz's First Set Of Document Requests
to Edwards and Cassell


1/15-present	Communications to/from Edwards and Cassell with Jack Scarola and with others made in furtherance of the rendition of legal services to Edwards and Cassell	Attorney-Client; Work Product
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Edwards, Bradley vs. Dershowitz

Case No.: CACE 15-000072

Revised Answers To Defendant Dershowitz's First Set Of Document Requests
to Edwards and Cassell

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 17th day of Sept, 2015.



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EXHIBIT B

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EXCLUSIVE: White House aide says



Two x after

Teenage girl recruited by paedophile Jeffrey Epstein reveals how she twice met Bill Clinton

By SHARON CHURCHER and POLLY DUNBAR FOR MAILONLINE
UPDATED 19:53 EST, 5 March 2011

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As a New Yorker from humble beginnings, Jeffrey Epstein played on his blue-collar credentials and enormous wealth to extend tentacles of influence throughout America's liberal political elite.

During the outcry over the Epstein case, it emerged that another man with a notorious appetite for young women, Bill Clinton, travelled with Epstein to a number of destinations, including three times on the billionaire's private aircraft.

On one occasion, Epstein flew the former President, Hollywood actor and staunch Democrat Kevin Spacey and another actor friend of Mr Clinton's, Chris Tucker, to Africa, to 'discuss AIDS policy'.



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Oops! Brandi Glanville accidentally tweets, then deletes cleavage snap meant for her 'boyfriend in Utah' The 42-year-old 's enhanced assets



AD-000189

Claims: [redacted] says she twice met ex-president Bill Clinton, pictured last month, but was never 'lent out'

Epstein, who has donated more than £75,000 over the years to candidates from the Democratic Party, also flew with Mr Clinton in November 2003 to destinations including Russia, Oslo, Hong Kong, Shanghai and Beijing.

Yet [redacted] stresses that she was never 'lent out' to Mr Clinton.

On one occasion, she adds, Epstein did invite two young brunettes to a dinner which he gave on his Caribbean island for Mr Clinton shortly after he left office. But, as far as she knows, the ex-President did not take the bait.

'I'd have been about 17 at the time,' she says. 'I flew to the Caribbean with Jeffrey and then Ghislaine Maxwell went to pick up Bill in a huge black helicopter that Jeffrey had bought her.'

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'She'd always wanted to fly and Jeffrey paid for her to take lessons, and I remember she was very excited because she got her licence around the first year we met.

'I used to get frightened flying with her but Bill had the Secret Service with him and I remember him talking about what a good job she did.

'I only ever met Bill twice but Jeffrey had told me that they were good friends.

'I asked, "How come?" and he laughed and said, "He owes me some favours." Maybe he was just joking but it constantly surprised me that people with as much to lose as Bill and [Prince] Andrew weren't more careful.

'Bill must have known about Jeffrey's girls. There were three desks in the living area of the villa on the island.'



© MICHAEL THOMAS

Speaking out: Virginia, now aged 26, in her new home in Australia

'They were covered with pictures of Jeffrey shaking hands with famous people and photos of naked girls, including one of me that Jeffrey had at all his houses, lying in a hammock.

'We all dined together that night. Jeffrey was at the head of the table. Bill was at his left. I sat across from him. Ghislaine's blonde British assistant, sat at my right.

'Ghislaine was at Bill's left and at the left of Ghislaine there were two olive-skinned brunettes who'd flown in with us from New York.

'I'd never met them before. I'd say they were no older than 17, very innocent-looking.

'They weren't there for me. They weren't there for Jeffrey or Ghislaine because I was there to have sex with Jeffrey on the trip.

'Maybe Jeffrey thought they would entertain Bill, but I saw no evidence that he was interested in them. He and Jeffrey and Ghislaine seemed to have a very good relationship. Bill was very funny.

'He made me laugh a few times. And he and Jeffrey and Ghislaine told blokey jokes and the brunettes listened politely and giggled.

'After dinner I gave Jeffrey an erotic massage. I

'Bill must have known about Jeffrey's girls. There were three desks in the living area of the

'I want to be a wife one day': My 600lb Life star enjoys her first ever date after shedding half of her body weight

Tara, 36, from Louisiana, had a romantic dinner



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Confirmed her second pregnancy in November



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Can't Touch This! Miley Cyrus shows off her eccentric style as she

AD-000190

don't remember seeing Bill again on the trip but I assume Ghislaine flew him back.'

According to prison records, when Epstein was serving his jail term, his visitors included a long-time – and highly controversial – Clinton acquaintance, Arnold Proseni.

'In the final hours of the Clinton presidency, in January 2001, Proseni was facing three years in prison after being convicted of tax fraud. Mr Clinton commuted his sentence to house arrest.

'Clinton, Proseni and Epstein make an odd threesome on the face of it,' says a law enforcement source.

'Was Proseni visiting Epstein as some kind of intermediary for Bill?

'Maybe Bill wanted to know if Epstein knew anything that could embarrass him. Or did Bill commute Proseni's sentence as some kind of favour for Epstein?'

Virginia disclosed that Mr Clinton's vice-president Al Gore and his wife, Tipper, were also guests of Epstein on his island.

villa on the island... covered with photos of naked girls'



© AFP/Getty Images

Guests: Virginia says she also met former Vice President Al Gore, pictured right with Mr Clinton

Last summer, the Gores abruptly announced that they were ending their supposedly fairytale marriage and, just weeks later, it emerged that Mr Gore – the famously sanctimonious global-warming disciple – had been accused of trying to force sex on a woman with whom he had booked a therapeutic massage at an Oregon hotel.

'I had no clue that anything was up,' Virginia says. 'The Gores seemed like a beautiful couple when I met them. All I knew was that Mr Gore was a friend of Jeffrey's and Ghislaine's. Jeffrey didn't ask me to give him a massage.

'There might have been a couple of other girls there on that trip but I could never have imagined this guy would do anything wrong. I was planning to vote for him when I turned 18. I thought he was awesome.'

Virginia said that yet another American liberal icon, President Obama's Middle East peace envoy Senator George Mitchell, frequently visited Epstein's New York residence.

Mr Mitchell, aged 77 – who previously led America's Northern Ireland peace initiative – 'was very close to Jeffrey,' Virginia recalled. 'He is very clean-cut. You wouldn't think of him being part of Jeffrey's crew.'

steps out in sequined harem pants

She's more renowned for flashing flesh now



Amanda Bynes 'won't be prosecuted for her September DUI but could still face jail'... and has not been seen in public in two months
She's under probation

As TLC offers a first look at its brutal new show *Style By Jury*, host and fashion expert LOUISE ROE explains why first appearances matter so much

Rosie Perez WILL return to *The View* on February 3, Rosie O'Donnell announces – dashing rumors she had been fired from the troubled ABC show

'I'm a hopeless romantic': Jennifer Lopez reveals she'd like to date again... and her crushes on Charlie Hunnam and Tom Hardy
Been married 3 times

Slam dunk! Ariana Grande, 21, will headline NBA All-Star halftime show in New York, following in the footsteps of Mariah Carey and Beyonce

Back to reality! Make-up free Renee Zellweger has coffee with a friend after returning from luxurious Hawaiian holiday
Spotted sitting al fresco

'I was very scared of her': Julianne Moore recalls how nervous she was slapping Madonna in the 1993 flop *Body of Evidence*
Spoke of sex scenes too

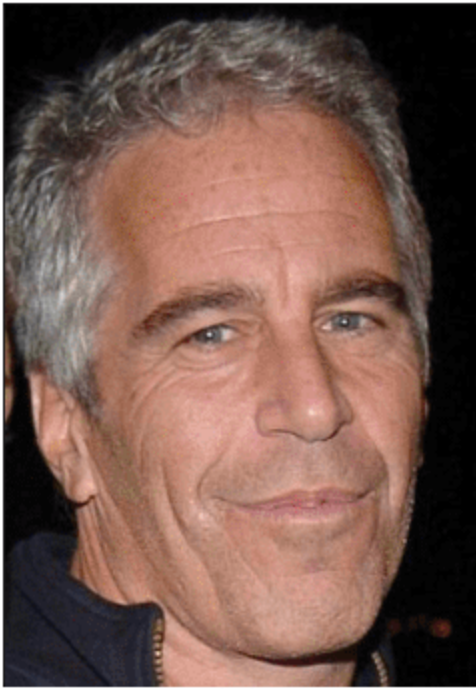
Will Ferrell gets hauled off by security at NBA game while filming scenes for new comedy *Daddy's Home* during halftime
Were they in on it?

Did Victoria's Secret provide the costumes? Miss Universe contestants slip into 'national dress' (but can you guess who comes from where?)

Bikini-clad Britney



AD-000191



© Richard Young / Rex Features

Scandal: U.S. authorities want to interview Jeffrey Epstein (left) and may wish to quiz his friend, Prince Andrew

Epstein's contacts book contains a work and a home telephone number for the senator

Another acquaintance was Israel defence secretary Ehud Barak, whose spokesman told The Mail on Sunday: 'Mr Barak did attend several small functions in Mr Epstein's home in New York that were usually attended by leading businessman, university presidents, Nobel Prize Laureates and prominent public figures.'

Epstein's many Hollywood pals include Matt Groening, creator of The Simpsons.

'Jeffrey once had me give Matt a foot massage when he was flying on the jet with us,' Virginia says.

'He laughed and did drawings of Bart and Homer for my little brother and my dad.

'I also met Naomi Campbell at a birthday party of hers on a yacht in the South of France. She is a friend of Ghislaine's but she was a real bitch to me.

'She was very fake. She turned away from me when we were introduced by Ghislaine and Jeffrey.

'Donald Trump was also a good friend of Jeffrey's. He didn't partake in sex with any of us but he flirted with me. He'd laugh and tell Jeffrey, "You've got the life."

Palm Beach Police say Epstein seemed utterly unfazed by the allegations against him when they began their long and detailed investigation.



© AP

'Jeffrey's crew: Middle East peace envoy George Mitchell, right, pictured with President Barack Obama and U.S. Secretary of State Hilary Clinton, frequently visited Epstein's New York residence, Virginia also claims

But he also took his defence very seriously indeed. Epstein engaged his friend, the Harvard law professor Alan Dershowitz – whose celebrity clients have included Mike Tyson, Patty Hearst, Claus

Spears shows off her flat stomach and muscular frame during synchronized swimming session
Her new workout regime



'We never even considered it' Fifty Shades Of Grey director reveals why they cut infamous tampon scene before filming
Explicit scene in book

Legendary shoe designer Vince Camuto dies at the age of 78

Mr Camuto passed away following a battle with cancer - he is survived by his wife and five kids



Ed Sheeran poses with The Stig before veering off course as he becomes third non-driver to tackle Top Gear challenge
British singer on show



Joined at the hip(ster): Kristen Stewart and close pal Alicia Cargile wear snapbacks and slogan sweaters to grab coffee together
More than just friends?



'What the?' Miley Cyrus shares a snap of herself as a fresh-faced teen... then poses in a VERY low cut top in bid to win followers
Provocative pop star



Gwyneth Paltrow reveals sideboob as she wears a stunning thigh-split gown at Mortdecai premiere in Los Angeles
Mother-of-two is not shy



Couldn't decide on one? Bachelorette Desiree Hartsock wears TWO dresses to marry Chris Siegfried in vintage-themed wedding
Wed in California



So that's her secret! Charlize Theron shows off her sexy figure in a low-cut top and leather trousers as she snacks on fruit during shoot
Joined by her son



Boy Meets World! Actor Rider Strong welcomes a baby son with actress wife Alexandra Barreto... and they give him a colorful name

von Bulow and O.J. Simpson – to run his legal defence.

He also employed a firm of private investigators to investigate the backgrounds of the girls.

Detectives painstakingly built a case which they believed showed that Epstein systematically paid teenage girls to recruit other teenage girls to his sex ring.

However, as the investigation continued, they found that Epstein's team had already spoken to key witnesses, suggesting that the financier would reward those who helped him.

In addition, Epstein's defence team agreed to the unusual move of suggesting that the alleged victims sue Epstein in the civil courts. The result was a plea bargain in which Epstein admitted a single charge of soliciting an underage girl for prostitution – a deal which infuriated many police officers who worked on the case.

More than 20 of Epstein's girls are said to have sued him for damages. At least 17 have settled out of court.

Mr Clinton, Mr Gore and Mr Mitchell were all contacted about their friendship with Epstein but declined to comment.

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'It's my body, it's my birth, it's my

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steve, hartlepool, 3 years ago

mariella winchester 06/3/2011 err the answer to your question is because there underage .so yes let them relax with women but not with underage girls

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149

11



Joe, The Internet, 3 years ago

Silly Billy.

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Ethan, Farmington, 3 years ago

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Not Berry glamorous! Halle has a dress down day going make-up free to pick up groceries She has a busy life with two children and a television series



'I know who David Beckham is!' Jessica Chastain admits she's a big fan of the former soccer star's racy underwear ads Was on a UK chat show



Sarah Michelle Gellar attempts to go incognito in brown flat cap and sunglasses as she steps out for a shopping trip She's a mom her of two



British actress Kaya Scodelario 'in early talks' to take female lead in Pirates Of The Caribbean: Dead Men Tell No Tales The new Keira Knightley



'He's adorable': Ruth Wilson gushes over rumored love interest Jake Gyllenhaal... but

AD-000193

years later. Give me a break....

Click to rate 134 277

Julie, Essex, 3 years ago

This, I think is the tip of the iceberg. I have no doubt there are a lot of high profile people getting very nervous. I'm just waiting for the book and the film to come out.

Click to rate 354 7



Kevin Davidson-Hall, Mayfair, London W1, 3 years ago

"I want you to listen to me. I'm going to say this again: I did not have sexual relations with that woman,"

Click to rate 338 17

lj, Beijing, 3 years ago
money, power, sex

Click to rate 212 7

Tony, Newcastle, Uk, 3 years ago

This has always been rife amongst the inhabitants of the White House and their associates. Watch the (banned) documentary 'Conspiracy of Silence' online. These people are inhumane and disgusting yet the 'sheep' still believe and hang on their every word. Time to wake up people!

Click to rate 102 6

ange, Edinburgh, 3 years ago

I don't understand why everyone is so hung up on sex. Why shouldn't men relax with girls who are happy to provide their company? Why try to interfere with human nature? Make love not war! - Mariella..... Obviously you are single then??

Click to rate 13 39

joanna, Surrey, 3 years ago

She is very brave too come forward..... so was Cathy O'brian and Brice Taylor

Click to rate 69 6



Gordon, Leeds, 3 years ago

Erm, she was 17? This is not America, 16+ is legal here so no-one is a paedophile and this is a total non-story

Click to rate 37 104

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'brother and sister'
Broadway co-stars



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'It was in crayon, 'touch boob'': Olivia Munn jokes about Johnny Depp grabbing her chest in a scene from *Mortdecai* on *Conan*



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Steven Tyler showcases his bizarre mani-pedi at LAX as it's revealed he's headlining Rolling Stone's Super Bowl party. The rocker is 66



Her Majesty gets a taste of the Good Life! The

AD-000194

EXHIBIT C

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TELECON

PARTICIPANTS: JACK SCAROLA
BRAD EDWARDS
[REDACTED]

RE: Edwards adv. Epstein
291874

DATE: April 07, 2011

JS: [REDACTED], Jack Scarola and Brad Edwards

BE: H [REDACTED]

V: Hi Jack! Hi Brad! How you guys doing?

JS: We're doing fine, thank you. I'm sorry for all of the trouble and before we go any further, let me tell you, if I have your permission, I have started a tape recorder and I want to be able to tape this conversation from the very beginning. Is that alright with you?

V: Sure, that's fine, Jack. No problem

JS: Ok, good, thank you. I appreciate that. Let me start off by introducing myself. I know that Brad has spoken to you about me but I am Brad's lawyer, and I assume that you can confirm that you and I have never had any communication before. Is that right?

V: That's correct.

JS: Alright. I have, however, gotten some information from Brad about conversations that you have had with him, and that will enable me, hopefully, to make this a little bit more efficient and take up a minimum amount of your time while still getting the information that we think is going to be helpful to us and to any jury that might ultimately have to hear these facts.

So, let me begin by asking you first to tell us what your full name is.

V: [REDACTED] That's my maiden name. My married name is [REDACTED]
[REDACTED]

JS: Could you spell your last name for us? That is your married last name:

V: [REDACTED].*

JS: Alright, thank you, and where are you living right now?

V: I live in Australia.

JS: And how long have you resided in Australia.

V: This is my 19th year.

JS: That is where you are right now, correct? We've reached you in Australia for this phone conversation?

V: That is correct, yes.

JS: And what time is it in Australia right now?

V: I think it's about 9:00 now.

JS: Ok. That's 9am, correct?

V: That's correct.

JS: Alright. [REDACTED] the reason for this conversation is because it is our understanding that you know a man by the name Jeffrey Epstein, and I want to begin by asking you please to tell us about the circumstances of your first meeting Mr. Epstein.

V: Ok. I was introduced to Mr. Epstein by Ghislaine Maxwell. I was working at Donald Trump's spa in Mar-a-Lago and I was prompted by Ghislaine to come to Jeffrey's mansion in Palm Beach that afternoon after work to make some extra money and to learn about massage. She met me at the spa, and I was reading a book about anatomy, so I was already interested in massage therapy as it was and not having any of the education or you know anything behind me, I thought this was a great opportunity to work for her and go. So, I went to Jeffrey's mansion about 5 or 6 in the afternoon. My dad drove me there. My dad worked at Mar-a-Lago with me, and he met Ghislaine and she seemed like a nice, proper English lady, and she knows, I mean, you know, one time then _once before I left to travel overseas, she just seemed really nice and like she would like to help me out. So my dad left, and I had no problem getting home that night, one of her drivers would take me back after my trial. So she led me upstairs, and into Jeffrey's bedroom, and past that is Jeffrey's massage room, which has got his steam room and a shower and a massage table, and there is actually an extra room that has, that nobody knows about it, it's kinda like a secret room and it's got a whole bunch of decorative pictures of pornographic literature and sex toys and I can ___?___ what happened in there.

JS: When you say that the room was hidden, [REDACTED] how was the room concealed?

V: It wasn't like a door that you would normally go into, like some kind of special opening, you open that and then a little door, so it looks like it's a little closet so-to-speak, but when you walk in there, it's obviously a lot bigger than just a closet. It wasn't too big, but it was bigger, you know. It wasn't a gigantic room, it was just like a small room, which you know, it probably could fit some shoes in there, _it had racks of shoes, boxes, some sweatshirts neatly folded, and the ceiling to the floor was covered in pornographic pictures of the girls that he had met.

JS: When you say...

V: So anyways, that was getting there, and I was introduced to Jeffrey, he was laying naked on top of the massage table, and obviously for one, I'm a 15 year old girl and seeing him on the table was weird but, also learning about anatomy and massage, I thought this would be part of it. So obviously, I thought it was part of the massage program, so I said ok, this is fine. And, he then instructed me on how to touch the body, Jeffrey's body, how to massage him, and for the first hour, it was actually a real massage, maybe not an hour, maybe like 40 minutes or something, but of something like that _and that's when he turned over on the other side and to expose himself fully. So then Ghislaine told me that she wanted me to undress and began to take off my shirt and skirt, my white uniform from Mar-A-Lago, she also took off her shirt and got undressed, and so I was there with just my undies on, and she was completely bare, and made some kind of little flake about the underwear that I was wearing because it wasn't my normal sexy girl underwear and just like, I don't know, had red hearts on it or something like that; just your normal, you know, real cute underwear. Anyways, so during all of this I'm kind of like what's going on, how do I act, what do I say, I was so afraid of, not afraid or fearful for my life but _unsure of how all this started and wanting to obtain a profession_ I was so afraid thinking about upsetting and disappointing them, I don't know, it's a weird situation by far and I was expected to _Lick his nipples, instructed on how to do so by J.E_ and give him oral sex while he wanted to fondle me, and then at the end, I was told by Ghislaine to get on top and straddle Jeffrey sexually, and when we were done, we went and had a shower in the room and Jeffrey told me to wash him up and down, you know with a bar of soap and make sure he was all cleaned up. And then he took me downstairs and took me to two of the guards and told John to bring me home. John was the butler at the time.

JS: Let me interrupt you for just a moment there if I could, [REDACTED] You mentioned as you were recounting those details that you were 15 years old at the time. What is your date of birth?

V: [REDACTED]

JS: And can you tell us please, as best you're able to estimate it, what the date was when this first encounter occurred?

- V: I've got it written down. It's like - I'm not good with math - hold on - I thought I wrote it down but I didn't. I'm not too sure, I think it was 1998 off the top of my head and around June of 1998, I would say as I was turning 16 at the end of the summer.
- JS: Alright. You talked about the room where Jeffrey had the pornographic photographs. Did you actually see that room on the occasion of your first visit there?
- V: No, I got to see that room a few visits after but I was just trying to describe that room to you guys so you knew exactly what room I was talking about.
- JS: Another question for you, and I don't mean to be prying into your personal life, and if I ask you any questions at all that you're uncomfortable answering, then you just tell me that and we'll move on, because I appreciate your cooperation and the last I thing I want to do is impose upon that cooperation, but can you tell us please just generally what kind of sexual experience you had had prior to this confrontation with Jeffrey?
- V: Yeah, sure. A close family friend has sexually abused me, and I was on the streets at 13 years old. I was picked up by a 67 year old man named Ron Eppinger who did exactly what Jeffrey did with me abuse and violate my youthfulness - & I was with him for 6 months. So, he was gone and then I had this boyfriend who was like my school friend from young days but we just kept in contact with each other and we were on and off constantly, and that was Tony Figeroua, and there was also another younger guy was near my age, Michael, I can't remember his last name, but yeah, there, I mean, there wasn't like a string of men or anything, but there was Ron, like I told you, and he was the first guy expecting me to do so-called disgusting affairs. Jeffrey actually knew Ron, which was quite weird when I told Jeffrey the story about Ron, and Jeffrey had actually met him, and yeah. Anyway, just another story, and yeah, there were a couple of men, but that gives you an idea.
- JS: Now when you described the photographs in the room as pornographic, tell me just a little bit about the photographs, if you would please? First, how many of them were there?
- V: At least 100, and like I said, they covered the room from the ceiling, not the ceiling but from the top of the edge of the wall to the bottom of the floor. I want to say at least a hundred, even more, there could have been more in the boxes - Some of them were A4_ photographs, like the large size, some of naked women posing, you know, positions, sexy positions. Others were, you know, some girls had bikinis on, and it wasn't so pornographic, but it was all women, and it was all in a sexual nature.
- JS: Were there photographs where more than one person appeared?
- V: Oh yeah, plenty of them. There were lots of naked photographs, I mean I was just trying to give you a visual range. There was anything from 5x6s to 4x8s to 8x4s. Some of them

had frames, some of them were out of frames, but they were all, like I said, they were all women, they were all sexual in nature.

JS: Was it your impression that there were a hundred photos of a hundred different people or were there multiple photos of the same woman or girl?

V: There was definitely a lot of different girls. I mean it wasn't easy to sit there and say, you weren't finding 5 girls out of some photos, no. Were there a hundred different ones? There could have been pictures of some girls, I really couldn't get close necessarily to actually recognize faces or anything like that. But if you, you know, the range of them were all different, majority of them were different, yeah.

JS: Did there ever come a point in time when you became aware that a photograph of you had been added to the collection?

V: Yes, there was. Ghislaine took several nude photographs of me for Jeffrey. So, yeah, there were pictures of me and there were pictures, he wasn't shy, that wasn't the only place in his house that he kept the photos. He liked photos all over his house. If you looked in his den or on his desk or in on the hall table, a giant hall table in his house, there were at least a hundred photos of girls in frames. Not all of them were naked, a lot of the ones that were all around his house were not naked girls posing pornographically, some were pictures of celebrities and politicians he had known or things like that or had pants on or whatever, but yeah, there was a lot of mixed photographs in the outside ones.

JS: Were there any photographs of girls or young women that you knew or that you subsequently came to know that you saw in the house?

V: Yeah, yeah, there was. There was pictures of [REDACTED], pictures [REDACTED] pictures [REDACTED] pictures of me, pictures of the regulars, but a lot of the girls, sometimes Jeffrey could have like 7 girls a day, and he would only see those girls once if he got bored. I don't know. These weren't my days. I heard he's gotten a lot sloppier since I left. So, I don't know anyways, but when I knew him, there was just a, it seemed, there was such an influx of girls coming in and out, so did I recognize a lot of them? Maybe, maybe not, but then they were all definitely beautiful, they were all ranging in age, some of them young, some of them older in their 20's, I mean it was just they were all beautiful.

JS: You've told us about the first visit. Was there any discussion on the occasion of that first visit about your returning?

V: Yes, they were very pleased with me and after the encounter was finished, the sexual encounter, he went and told me I did well and I have a lot of potential to become a massage therapist and if I'd like I could return tomorrow, you know, and do the same thing and get paid \$200/hr, so Jeffrey insisted that I come after work, and over the next few days, I guess the relationship grew into more, and within a couple of weeks, not even

a couple of weeks, maybe a week, I had quit Mar-a-Lago and I was working for Jeffrey full time.

JS: Ok, let's talk about your job at Mar-a-Lago, if we could. You said that your Dad was working there. What was his position at Mar-a-Lago?

V: He was a maintenance supervisor I think is what it was called? He like managed the tennis courts and air conditioners and things like that.

JS: What is your Dad's full name?

V: [REDACTED]

JS: And is he still living here in South Florida now?

V: No, he's not, he's in California.

JS: Ok. Is your Dad aware of what is currently going on with regard to your having made public statements about your relationship with Jeffrey?

V: Yes, he is well aware of it. I told my family even before all this stuff came out, because they were the first ones contacted by the journalists from Mail on Sunday. I know that they the Mail on Sunday printed that I had gone out and tried to, I mean I think one of the photos said that I was angry that I saw Jeffrey and the Prince walking together and that is why I came out and went public with everything. Not true. I mean, I am angry about how they are still up to their old ways together and that they're still hanging out but I didn't contact the Mail on Sunday and I didn't bring it out. I figured that everyone was going to bring it out anyway and I better bring it out the right way. He's known everything from the start, and my family is very supportive with everything going on.

JS: I'm kind of going to jump around a little bit and I apologize for that, but since the subject has come up, tell me first of all why you are providing this cooperation to us, and I am certainly very appreciative of it, but I want you to tell us why it is you've chosen to spend time with us on the telephone and provide this information that you're now providing.

V: I'm out to help the bigger picture, you know, I think all of us can make a big difference in a lot of other people's lives and I think that this has gone on long enough and it's a big slap in my face that he can get away with hurting me so bad let alone so many other girls and laugh about it. I guess I talked to you guys out because I want to see the right thing happen, not just to him, but I want people in the world to understand this is not the way of life, you know, it's not acceptable to go out procure young girls and make them think that, this is the way you should be living and that's all. Yeah, I guess my reason for doing it is to help the bigger picture, you know, I'm a big believer in karma and I believe that good things will come back to you, so I guess that's why I'm doing this.

- JS: Just for the record, neither Brad, nor I, nor anyone representing that they have anything to do with us has made any promises to you. Is that correct?
- V: That is correct. I'll tell you, since this is our first conversation, that nobody has made me feel like I've been bribed or bought or had to say anything. I've told you anything that I know from my own self, not some things somebody told me. If anything, Brad's been extra careful not to tell me anything and let me do all the talking, so it's quite opposite I think.
- JS: Alright. Let's get back then to the story of your relationship with Jeffrey, and we've talked about your first encounter with him and how it evolved from that into your full time employment with Jeffrey, but what were you doing at Mar-a-Lago before you quit Mar-a-Lago?
- V: I was just a locker room attendant and sometimes I did babysitting for the rich and famous. So, I wasn't anything big. I worked in the spa area. That's why I was studying anatomy, because I was really really interested in becoming a _massage therapist_, and at the locker room, I didn't do much. I mean I was making tea for a living, I would, you know, make sure the toilet paper had a little triangle in it after everybody went to the toilet, or wipe down the water from the basin, you know, it was a very easy peasy job.
- JS: Did you get that job through your Dad?
- V: Yes, my Dad got me the job.
- JS: Ok, and you were only 15 years old at the time, were they aware of how old you were at Mar-a-Lago?
- V: Of course, definitely. We had to go through extensive, you know, we even had to get drug tested and id test and so on and so forth. I mean, Mantas (?) is very strict on employment, yeah, everybody knew.
- JS: Ok. Was there ever any conversation with Ghislaine about how old you were before you were taken to Jeffrey's mansion?
- V: No. She didn't ask me how old I was from the start, but when I did get to Jeffrey's mansion, it was discussed how old I was.
- JS: With whom?
- V: During the entire hour of what I call the legitimate massage I was giving him, it was cat and mouse games getting information from me to find out who I am, am I a willing participant in these kind of things, and how would I react if they were about to take the next step. But they got information off of me, they got my age, they got my, a little bit of my history so they knew I was, you know, not very stable at home, and they knew that,

you know, I was actually interested in making my life better by studying so what they were offering me was a chance to become a legitimate masseuse but it was getting trained. They would have people show me how to work the body and be called a massage therapist and get me books on it, and you know, keep me interested, and every time, you know, I was with Jeffrey, literally was about massages, I don't mean just going in and have sex with him. I mean massage, because it would always start out with massage and then it would lead into sometimes other things.

JS: Alright, once this evolved into full time employment, what did full time employment mean?

V: That was entirely having to travel with Jeffrey in every city. When he was in Palm Beach, I stayed at my apartment, and he would call me to his house once or twice a day sometimes, and that's, you know, do things with him. Sometimes we'd go out shopping, sometimes we'd go out and watch a movie. You know, simple things like that, go to an expo or a fair, whatever it was. But when we were in other cities, I was at my apartment, I lived with him full time. What I mean by full time is even in the middle of the night, I could get a ring on my phone next to me and tell me to come in his room, you know, so it was literally full time.

JS: When you say that when you were in Palm Beach you were living in your apartment, were you living on your own or were you living with members of your family at that time?

V: No, after I quit Mar-a-Lago, Jeffrey offered to get me an apartment in Palm Beach somewhere, Royal Palm Beach, and it was a nice apartment. He furnished it for me, it was absolutely beautiful, but yeah, that's the only time I would spend time away from him really.

JS: This apartment was on Royal Palm Beach Boulevard or out in the Village of Royal Palm Beach?

V: I so honestly don't remember. I've been trying to rack my brain because the FBI was asking the same thing and were trying to find it, but yeah, I'm Not sur_. I didn't get to spend as much time in it, I was only there about an entire week out of every month probably, but the majority of the time I was with Jeffrey anyways. It was somewhere in Royal Palm Beach. I don't know about Royal Palm Beach drive. I don't even remember the Royal Palm Beach drive anymore so I'm not too sure.

JS: Ok, let me see if I can draw the distinction for you and maybe that will help you to help us? Royal Palm Beach is a village that is...

V: No, no, no, I got Royal Palm Beach, I just didn't know the Royal Palm Beach Drive, like what street it's off of. Were you talking about a street?

- JS: Yes, I was talking about a street. Royal Palm Drive is on the island of Palm Beach, and it's a street that is lined with large royal palm trees, and I'm wondering if this was an apartment on the island or was this an apartment out west of town...
- V: No, it was actually in Royal Palm Beach, not on the island.
- JS: Alright.
- V: I would be driven, it was closer to my family than it was closer to him. I wanted to be close enough to everybody else so that when I was in town, I could just go see them quickly.
- JS: Ok. So we're not talking about Royal Palm Boulevard. We're talking about the town of Royal Palm west of town. Jeffrey got you an apartment out there.
- V: That's correct.
- JS: When he was in Palm Beach, you were generally not staying at the mansion, you were staying at the apartment that he got for you out west of town.
- V: That's correct.
- JS: Ok.
- V: I mean then there was times, I don't wanna say that every time I stayed at my apartment. There was times we'd fly back from some city maybe too late at night to really want to go back home, so you know, it's like 12:00 at night or 1:00 in the morning. I was just staying in the yellow room, or something like that; one of the guest rooms in Palm Beach. But majority of the time, I would definitely want to get back to my own apartment.
- JS: Alright. What were the general hours of your full time employment when ...?
- V: There was not set hours. It wasn't like logging, and you know, hitting the shift button, nothing like that. The way I would get paid would be, ok, if I was in Palm Beach, I would get \$200 an hour to massage Jeffrey or some of his friends and then go home. So it would be like that. If I was traveling with him, it would be per massage, so I would be getting paid per day. So I wouldn't be getting paid on an hourly rate. He wouldn't say ok, today you're going to work for me from 7:00 in the morning until 8:00 at night. It never like that. I was on call all the time.
- JS: When you were here in Palm Beach, were you actually getting paid only for the time spent massaging Jeffrey or were you getting paid from your arrival at his house until you left the house?
- V: From the time the massage started.

JS: From the time the massage started. Ok.

V: Sometimes we'd go there and I would wait for a while or talk with Ghislaine and Jeffrey about something or we'd meet somewhere and talk about something. A lot of times, I'd meet him upstairs in his room where he was ready for me. But then there was a lot of times where it didn't start right away, so he couldn't really pay me from the time I got there sometimes unless it was just paid from the time I massaged him til the time the massage was over.

JS: Alright. Did your duties for Jeffrey ever include anything other than providing him massages and sex in connection with the massages? Did he ever give you any other responsibilities to perform?

V: I was asked to do the same things that I did to Jeffrey to a few of his fellow colleagues as well. Those were my duties. He looked at it this way is that I was going to be a professional massage therapist, and maybe I needed some clientele, so he had me perform erotic massages on a few people.

JS: Did that start here in Palm Beach County?

V: It did. The first one did.

JS: Ok, and how long after you first met Jeffrey did he first ask you to provide services for one of his friends?

V: About 9 months, I think it was. It wasn't a full year, it wasn't 6 months, but between 6 months and a year, which is why I'm saying 9 months.

JS: And when you provided services to a friend of Jeffrey's, who paid you for those services?

V: Jeffrey would. I would get paid the next time I saw Jeffrey, so if I was invited to the Breakers Hotel to give a massage, I would give a massage, I would go home, and the next day when I saw Jeffrey, he would pay me for what I did. So, it was paid always by him, it was set up by him, so he always knew what to pay me. I did get tips and things like that, if you call it that, you know, like a hundred dollar tip or something from a few of them, you know, yeah.

JS: Was there ..

V: There was always payment from Jeffrey.

JS: Was there ever any discussion with Jeffrey about what was expected to happen when you provided massage services to one of Jeffrey's friends?

- V: In a roundabout way, yes. In so many ways, Jeffrey really really had to train me, and that was why Ghislaine said that she and Jeffrey enjoyed me so much was because they never really had to speak much to me to tell me what they wanted me to do. You know, I wasn't waiting for you know, their directions. Jeffrey would tell me to go give an erotic massage to friends. He wouldn't give me much detail about it, but he would say to treat them like you treat me.
- JS: Did he refer to it as an erotic massage or are those your words?
- V: Erotic massage is my words. That's exactly what it was, but he would tell me to treat them how he wanted it, so I'd do what he wanted without having to say to me words more. I mean, I complied with what he wanted because it was somewhat of a, I don't know, I don't know how to say it, it was just very mindboggling how I let him have so much control or power over me basically. The massages would be routine to what Jeffrey wanted with my so called new clientele, and with their own words would ask me to provide them with sexual pleasure after the massage.
- JS: Did you ever report back to Jeffrey about what happened when you provided massages to his friends?
- V: Of course, of course, and I knew that his friends were reporting back to him as well because there were times where he would instigate conversation by saying you know, so and so had a great time, you did wonderful, you know so and so gave me a call and told J.E how it went_...
- JS: Did Jeffrey ever elicit details from you? "Tell me what happened, describe in detail what went on?"
- V: No, but he would have a laugh, he had a laugh with me a few times about some of their different mannerisms, I guess you would say, like some of them, one guy had a foot fetish and that was really weird and I mentioned it to Jeffrey, and we would have a laugh over it. He didn't want to know details. He wasn't asking me "so tell me what did you guys do exactly." No, he just basically gave me a slap on the back and said, you know, good job. And we had some kind of conversation about it. I can't recall any conversation off the top of my head. I really don't know one. It's been that long. But yeah, we did talk about it briefly.
- JS: Can you give me an estimate as to the number of friends for whom Jeffrey provided and paid for your services?
- V: There was about, you know, I don't know, 8 guys possibly.
- JS: And are you able to name those people for me?

V: No, not at this stage. I just, some of these people are really influential in power, and I don't want to start another shitstorm with a few of them. I'll tell you that there was some erotic massages given to, I'm just afraid to say it to you.

JS: Ok, [REDACTED]

V: It's like geez, I don't know if I want to, I'm really scared of where this is gonna go.

JS: Alright. I understand that, and as I told you from the beginning, if I ask you a question that you are uncomfortable answering, you just tell me that, and I will move on, and I understand that at least right now, you are uncomfortable answering, and I am certainly going to respect that.

V: Thank you so much, Jack.

JS: No, that's quite alright. I am very appreciate of the cooperation you are providing, and I don't want you at any time to feel that we are taking unfair advantage of that cooperation, so give me the information that you're comfortable giving me, and if we get to a point where you're uncomfortable, I will respect that and we'll move on from there.

V: Ok.

JS: I want to talk a little bit about the traveling that you did with Jeffrey. About how long into your relationship with him did that first start?

V: Immediately. I started traveling immediately. Not internationally until I think about, Gosh, I can't remember even, I think it was a year later that we started doing international travel. Maybe like 9 months to a year again. Not too sure to be honest.

JS: So that would have been approximately the summer of 1999? Somewhere around there?

V: Yes. Somewhere around there. Somewhere around a year, somewhere around there, I can't pinpoint it exactly. But like I said, we started doing domestic traveling immediately, so my first destination with him was New York and Santa Fe and the Carribean, California, I would take trips with him occasionally. Sometimes we would go to St. Louis or New Orleans or Santa Cruz. We were traveling just about everywhere I think.

JS: How did you travel?

V: Well, we took Jeffrey's private jet, and unless I was being sent somewhere by myself for what we were just talking about before, then I would travel on a what do you call, a public jet, whatever it is...

JS: commercial flight?

- V: Yes. Just a normal flight, an e-ticket.
- JS: Like the rest of us common folk.
- V: But when I was traveling with Jeffrey, the majority of the time would be on the black jet.
- JS: Now, when you say there would be times when you would travel by yourself because he was sending you somewhere, tell me about that. How did that come about?
- V: So, one of his colleagues would be at the Carribean or Santa Fe or even New York, or wherever, and he would call me up on those days where I am not working with him or in Palm Beach with him, and he would ask me to get on the next plane to so and so and go meet so and so, and that's when I would take e-tickets. His secretary or special assistant, whatever, would organize it for me and give me the details and I would just walk up the line and they'd let me right through.
- JS: Can you give me any ideas as to how many times it happened that Jeffrey would send you off to meet some friend of his at some location outside of Palm Beach?
- V: How many times it happened? I'm not too sure. Probably about 10-15 times.
- JS: Ok. And on those occasions, how much time would you spend with one of Jeffrey's friends when you were sent to a location that you would have to travel to?
- V: Only a couple of days. Only 2 days, that's it.
- JS: And how were you paid for those trips?
- V: I would be paid in cash upon my arrival back with Jeffrey. So, whenever I was back with Jeffrey, he would count up how many days I've had, sometimes give me even more than what I deserved, not deserved, but what I earned and give me a little extra.
- JS: Was there a daily rate for those trips or was that per massage also?
- V: Per massage. With Jeffrey, I would be honest. I wouldn't tell him I did 15 massages if I didn't. He knew he could trust me. He could always come back to the other person that he sent me to give massages and ask them as well, so you know, it was always by per massage.
- JS: Alright. When we've been talking about massages, tell me exactly what it is we're talking about when we speak about massages.
- V: Same thing I would do to Jeffrey. Again, it would start out as a massage, which would start with them being naked, and me giving him a legitimate massage to begin with, so

I'd start with his feet, go up to his calves, up his legs, buttocks, back, his neck, his head, his arms, yada yada, and then it would be time to flip over, and some of the men would want me to continue on massaging the front side of them and they would instigate me to begin having sex with them or foreplay, whatever you want to call it.

JS: So routinely, these massages involved sexual activity. Is that accurate?

V: That is accurate.

JS: Ok. Let's talk about the travel that you were involved in when you were on Jeffrey's private plane. Generally speaking, who were the passengers on the plane when you traveled.

V: Well, Larry was the pilot, and then there was a short, small solid guy, I don't know his name, but he was a co-pilot, and then he changed and there was another guy brought in later on. Generally speaking, there was always Jeffrey, sometimes Ghislaine, sometimes [REDACTED] sometimes a whole bunch of other girls, sometimes famous people, sometimes some politicians or yeah, just about anybody could fly on his plane. There was never no any set routine who would come and who would go. It was an influx of people on Jeffrey's airplane.

JS: I want to deal with these things separately in order to respect some of the reservations that you have, so I'm going to ask you who the people were that you remember flying with Jeffrey on his plane when you were personally present without regard to whether there was any sexual activity that occurred on the plane or not. So I'm not asking you to implicate any of these famous people in improper conduct, but just tell me what the names of the people are that you remember that you consider to be famous people.

V: Ok, there was Naomi Campbell, Heidi Klum, there was Bill Clinton. There was Al (?) Gore, there was a whole bunch of models, I wouldn't really honestly be able to give their names. There was Matt Groning the producer of the Simpsons cartoon, Jack CCousteau's granddaughter a lot of interior designers, architects, politicians. I am just trying to think of as many names as possible for you. Off the top of my head, that's as good as I can get for now.

JS: Ok, alright, that's fine. And again, I am not implying by my questions, nor do I want your answers to be interpreted as your suggesting that any of those people that you have just identified were engaged in any improper activities on any particular flight, but I want to talk to you now about what went on on occasion on the airplane. Ok?

V: Ok. It was a lot of the same thing that went down on the ground. A lot of times, it would be just be me and Jeffrey, or me and Jeffrey and Ghislaine, or me and Jeffrey and some other girl, sometimes [REDACTED]. There would be sexual conduct, there would be foreplay, there was a bed in there, so we could basically reenact exactly

what was happening in the house. It would start off with massaging or we would start off with foreplay, sometimes it would lead to, you know, orgies.

JS: Were there occasions when you were in Jeffrey's company, whether on the ground or in the air, where there were other girls present whom you knew to be under age 18?

V: Yes. There was a constant influx of girls coming in and going out. And we were all very young. On occasion, there was some older girls, and I don't mean older as in like in their 30s or anything, I mean like 28, 29, something like that, just very rarely. The majority of the girls that Jeffrey actually met or had on his plane or in his house were under age.

JS: Do you know how it is that Jeffrey established with any of these underage girls?

V: Yes, I do. He would send me personally or with other girls to clubs or shops, to pick up anywhere, I mean we were constantly on the look for other girls that might satisfy Jeffrey.

JS: What instructions were you given about what to look for?

V: Young, pretty, you know, a fun personality. They couldn't be black. If they were any other descent other than white, they had to be exotically beautiful. That was just about it.

JS: Who gave you those criteria?

V: They both gave us the instructions, and it wasn't just me, Jeffrey asked most girls to bring a friend and make extra money. They would use us young girls So that way it probably looked a lot more safer to a girl that we were procuring to younger girls that were already doing it. That was the way that Jeffrey had it.

JS: Were you given any instruction at all on how to approach these girls?

V: Yes. Jeffrey and Ghislaine both taught me to, depending on the circumstances, depending on the girl, you could offer them a job as a massage therapist or you could tell them you have a really rich friend with, you know, great contacts in the acting world or modeling world and he loves pretty girls, you should come back and meet him, make some money, you know, we had a whole bunch of ways to be able to procure girls.

JS: Can you give me any idea as to the total number of underage girls that you know engaged in sexual conduct with Jeffrey during the period of time you had your relationship with him?

V: I would have no way of estimating that whatsoever. I mean, there could be a hundred, there could be more, honestly I'm not too sure how many girls, really. I wish I did know. I mean like I said there were so many over the course of 4 years with Jeffrey.

- JS: Let me see if we can try to narrow it down a little bit. Is there any doubt in your mind that it was more than 10?
- V: Yes, there was definitely more than 10.
- JS: Ok, what I want you to do is to give me the highest number that you are comfortable in saying there were definitely more than X number of underage girls that I know Jeffrey Epstein engaged in sex with while I had a relationship with him. How would you fill in that blank? Definitely more than how many?
- V: I'd say definitely more than a hundred.
- JS: Alright. Did Jeffrey ever help to pick out your clothes?
- V: Oh yes. I mean he wasn't out to dress me like a porn star or anything. He would always dress me very classy, but we'd just go shopping all the time together.
- JS: Did he ever express any style preferences in terms of how he wanted you to dress? Besides dressing classy, I'm, you know, any other suggestion to you about how he wanted you dressed?
- V: He didn't, like I said, wasn't trying to dress me in any prostitute way or anything like that. It was nice, classy outfits I was wearing like Gucci, Dolce Gabbana, Chanel, things like that. He was buying me a lot of very, very nice clothing. It was provocative. I mean I was wearing miniskirts, and tight short shorts and little shirts that showed my belly and my cleavage and everything, but they were very expensive clothes.
- JS: Was there every any dress up role playing?
- V: Yes. There was. Lots of it. Jeffrey loved the latex outfits Ghislane had for us girls, he had bondage outfits, he had all different kinds of outfits, but his favorite was the schoolgirl.
- JS: Tell me about that.
- V: Well, you know, Ghislaine would take me to dress me up to surprise J.E or Jeffrey would ask me to get dressed up, that would include wearing a tiny little skirt with nothing underneath, a white collared shirt that you would be wearing to school with a tie in it, tied up in a bow, my hair in pigtails, stockings on up to my knees, and I would go in there and act like a kid and we'd do role playing sexing.
- JS: Did Jeffrey ever brag to you about the age of any of the girls with whom he had relationships?

- V: Yes, he did. He did all the time. The worst one that I heard from his own mouth was this pretty 12 year old girls he had flown in for his birthday. It was a surprise birthday gift from one of his friends and they were from France. I did see them, I did meet them. Jeffrey bragged afterwards after he met them that they were 12 year olds and flown over from France because they're really poor over there, and their parents needed the money or whatever the case is and they were absolutely free to stay and flew out. Those were the worst ones. He was constantly bragging about girls' ages or where he got them from or their past and how terrible their past was and good he is making it for them.
- JS: Where were the 12 year old girls flown to from France? Where did they come to?
- V: Palm Beach.
- JS: And were they flown in on Jeff's private plane or did they get transported?
- V: No. They were transported by somebody else.
- JS: Ok. Was the sexual activity that went on on the airplane conducted in such a way so that any of the crew was aware of what was going on?
- V: They were told to knock if they had to come out, if the crew had to come out. They were told, you know, to come out as little as possible, so they weren't out there hanging out watching everything, no, but it doesn't take an idiot to put two and two together to say well there's a whole bunch of half dressed teenagers on board with this old man who is constantly being massaged by them and he wants me to keep the door shut for what reason? I mean, only they could put that together, but yeah, they knew.
- JS: Did Mr. Epstein ever talk to you about people of power and influence owing him favors?
- V: He would laugh about it, you know, I never really knew what to take serious from Jeffrey because he was such a funny character at times. You never knew if what he was saying was true or not. Yeah, lots of people owed him favors from what he told me. He's got everybody in his pocket, and he would laugh about he helps people for the sole purpose in the end they owe him something. That's why I believe he does so many favors in the first place.
- JS: When and how did you first become aware that Mr. Epstein was in trouble with the law?
- V: I was first informed by, I think someone from the FBI called me first and started to ask me questions, and I started to answer the questions but then fear took over, and I just said look, I don't know what's going on, I've got a young family that I don't want to risk, you know, please don't bother me about this again, and it was real short simple conversation, and within a week or 2, I had gotten a call from Jeffrey's attorney, and then a week later, Jeffrey himself.

JS: Ok, well let's back up before we get to those conversations and tell me approximately when it was that you were contacted by the person who you believe was with the FBI.

V: Ok. It's hard for me to pinpoint, if I had to pinpoint it, it would be in 2007 sometime.

JS: Alright. And you were living in Australia at that time, correct?

V: Correct.

JS: You were contacted by telephone?

V: That's correct, by my cell phone.

JS: Ok and do you have any idea how your name came up leading to that contact.

V: No idea. No idea whatsoever. When I did ask, I was told that some girls had revealed my name, I guess, and that's how everybody, the FBI knew to contact me.

JS: OK.

V: But I don't know offhand or sorry, I just walked into the wrong room.

JS: Ok.

V: Sorry go on.

JS: Yes & I'll never tell her you said that. [REDACTED] how long was it after that phone call from the FBI person were you contacted by Mr. Epstein's lawyers.

V: Like a week. It was back to back to each other. I remember being so scared after talking to the FBI thinking what's happening, what's going on. It's been like 6 years, 7 years at that stage, how did they find me & what do I have to do with this? So yeah, I do remember that very well, and it was only about a week later I was called by his attorney.

JS: Who was it that contacted you, do you remember?

V: I want to say Bill Riley, but he might have been from the FBI. No, it was Bill Riley. Bill Riley. Not sure if that's his correct name, but that's what is coming to mind

JS: What do you remember about that conversation?

V: I remember a Mr. Goldberger as well, I remember, there might have been two of them.

JS: Alright.

- V: I can't remember which one it was. I want to say Bill Riley is the good one.
- JS: Alright, so either Bill Riley or a Mr. Goldberger or both of them contacted you, and what do you remember about that?
- V: I don't know if it was the same guy who contacted me that week later who put me in touch with Jeffrey. I think he was on the phone and he put speakerphone on with Jeffrey. So he connected me with Jeffrey. I don't know if it was the same guy or different, but I definitely know that Bill Riley was the first guy to contact me. I'm pretty sure about that.
- JS: Ok. Tell me about that conversation.
- V: He asked me what I knew about what's going on with Jeffrey and apparently, there was an investigation being held about some of the girls who had come out and said that Jeffrey had sexual contact with them under the age of a minor and that he was discrediting lot of these girls and making them out to be drug addicts and prostitutes and what have you so they wouldn't be looked upon as worthy in the court's eyes so to speak. And you know, he told me in the first five minutes that, you know, if I stay quiet, that "I'll be looked after". And that was the exact way it was said. It wasn't like you know, I'm gonna pay you a zillion dollars or anything if you be quiet, but if I stay quiet, I would "looked after". And I remember saying I don't want any part to do with this. You know, this is not something I want to be a part of, I've got a young family. I wish the best for everybody in this, you know, take care kind of thing. A week later, I was called after the hearing by one of Jeffrey's lawyers. I can't tell you exactly which one it was but he had Jeffrey on the other line and he connected Jeffrey and I, and Jeffrey tried to make some simple conversation, "How are you? How have things been?" You know what I mean, catching up.
- JS: Do you know if the lawyer, did the lawyer stay on the line while Jeffrey was speaking to you?
- V: I'm pretty sure he did. That's why I think Jeffrey was on speaker phone because it sounded a lot different, and I was never taken off the line to begin with or connected to another line, so I was pretty sure Jeffrey was on speaker phone and the lawyer was making the call. After the simple conversation, it led to what was going on again and you know, Jeffrey couldn't believe it. You know, he thought he helped all these girls out. He didn't think he was wrong in any circumstance here at all. A lot of these girls were drug addicts and just after drug money. You know, he was really putting down these women or these girls I should say, not giving them the credit they deserved, and then he exactly repeated what the lawyer said the week before is that he would look after me if I stayed quiet, and if I need any help, you know, his lawyers would represent me and he would get legal help for me, whatever I need, he would do, and I told him exactly, I said, "Jeffrey, I'm the mother of two children at that stage. I'm away from everything there, I don't want to be a part of it. I'm not going to speak to anybody and I don't want to speak to anybody, I don't want to be involved." That was the last time I heard from him. And the

next thing I knew, I was sent my victim's letter, my notification of being a victim through the US Attorney's Office and that's when I knew it was well out there enough not to have Jeffrey's lawyers come back on me and discredit me in the same way he had done to all the other girls. So, I called up Joseph Bird who was the recommended lawyers on my paperwork that they had given me and started going from there.

JS: So you contact Mr. Joseph Berge's office and then you were dealing with his office from that point forward.

V: That's correct.

JS: Tell me about the ending of your relationship with Jeffrey. That is, at what point in time did your full time employment end and how did that happen?

V: Ok. So, it hadn't really ended. I walked away from it all. Jeffrey sent me to Thailand where I met my husband and escaped to Australia, never to return back to the states. About 6 months prior to that, he came up with a proposition that I thought was really disgustingly sick. And it really showed me for the first time in 4 years I had been with him that nothing was going to change and I was always just going to be used by him(?) which I did not like. He offered me a mansion and some of his money every month, I forget what he called it, a monthly income of what he made to bear one of his children. The proposition was that if anything ever happened between Jeffrey and I, that I would have to sign my child over to him basically and that the child would be his and Ghislaine's, and I would be looking after it as long as nothing happened between Jeffrey and I. So, I was kind of freaked out by all of that. I pushed Jeffrey more to please get me some more training, you know, and I was getting older and not of as much interest to Jeffrey anyways. I was 19 now, and he likes a female a lot younger. So he sent me to Thailand, in September 2002_. I was first supposed to meet a girl there and bring her back with me, but I never met up with her. I proceeded get a short course in Thai massage so that was to shut me up about my training so I went there, and one of my friends from school invited me to watch a fight, like a muay thai fight, which is like a form kickboxing. So I went and watched it, and I saw this guy that was a really good fighter, and a girl's word, looked really hot, so I asked my friend who knew him to introduce me. We got introduced and fell in love immediately, 3 days later Rob proposed and 7 days later I was being married in a buddist temple. I called Jeffrey and told him I'm sorry, I'm never coming back. I've gotten married, I've fallen in love. I thought he'd wish the best for me but he was kind of rude and he just said "have a good life" and hung up the phone, and that was the last time I'd talked to him ever until all this started again.

JS: Ok. Virginia, is there anything else that you would like to add to what you have told us up to this point in time?

V: I'd like to know that this time around something's going to be done about it and that Jeffrey and a lot of his colleagues, no matter how rich they are, will know that there is

law and that there is people that still believe in it. So that's it. Thank you guys for listening to me, hearing me out and helping me. It's kind of hard to get through.

JS: Thank you very much. Yes, I'm sure it has been very difficult and I am very appreciative of the courage you have shown in doing what you have done, which really brings me to the last subject, and that is what was it that motivated you to go public with all of this?

V: Sharon Richard contacted me. I like her, I do, I like her a lot. I know she's a journalist, and journalists are normally bloodsucking leeches, but I like her for that, but she is an honest bloodsucking leech. She told me a lot about what was still going on, and she showed me a picture of Jeffrey with a little girl who looks like she could have been 12 years old. I mean it was disgusting. I agreed to talk with her, I never agreed to do anything until she showed me some pictures, and at that stage, being a mother of 3 children and having a daughter who I would do anything for to protect, I would put my neck on the line to make sure she never has to go through what I had to go through, and knowing all of this, and knowing that he's still out there doing the same exact thing with no regrets, no remorse, no worry about what he's doing to those girls, and all those girls feeling the same way that I did, so I, you know, I'm doing it because I believe in my heart of hearts it's the right thing to do. It's what I would want somebody to do for my daughter or my sister or my friend, and it saddens me to know that it's still going on right now. It's like the seashell story. I don't know if you're heard the story about the little kid who throws back a starfish, you know, the little brother tries to ask his sister, "why do you throw them in, they're all gonna die anyways, the little girl says "well, it's this one that I can help, and this one that I can help," and that's what I feel like I'm doing. I'm making a small dent in this big world we live in.

JS: I certainly appreciate that courage, and I have heard that story, and you're absolutely right, that one person may not be able to make a difference for everyone, but one person can make a difference for someone, and hopefully, you are making a difference for someone, and we're gonna do the best we can to make sure you are making a difference for as many people as possible.

V: Thanks Jack.

JS: Just a few other follow up things I want to ask you and again, if any of these questions are questions that you're uncomfortable in responding to, then don't hesitate to tell me that. Do you have any recollection of Jeffrey Epstein's specifically telling you that "Bill Clinton owes me favors"?

V: Yes. I do. It was a laugh though. He would laugh it off. You know, I remember asking Jeffrey what's Bill Clinton doing here kind of thing, and he laughed it off and said well he owes me a favor. He never told me what favors they were. I never knew. I didn't know if he was serious. It was just a joke.

JS: Where was here?

- V: He told me a long time ago that everyone owes him favors. They're all in each other's pockets.
- JS: When you say you asked him why is Bill Clinton here, where was here?
- V: On the island.
- JS: When you were present with Jeffrey Epstein and Bill Clinton on the island, who else was there?
- V: Ghislaine, [REDACTED] and there was 2 young girls that I could identify. I never really knew them well anyways. It was just 2 girls from New York.
- JS: And were all of you staying at Jeffrey's house on the island including Bill Clinton?
- V: That's correct. He had about 4 or 5 different villas on his island separate from the main house, and we all stayed in the villas.
- JS: Were sexual orgies a regular occurrence on the island at Jeffrey's house?
- V: Yes.
- JS: If we were to take sworn testimony from the people I am going to name, and if those people were to tell the truth about what they knew, do you believe that any of the following people would have relevant information about Jeffrey's taking advantage of underage girls? So I'll just name a name, and you tell me yes if they told the truth, I think they'd have relevant information or no, I don't think they would, or I don't know whether they would or not. Ok? You understand?
- V: Yes.
- JS: Ok. Les Wexner.
- V: I think he has relevant information, but I don't think he'll tell you the truth.
- JS: Ok. Alan Dershowitz.
- V: Yes.
- JS: David Copperfield.
- V: Don't know.
- JS: Tommy Matola.

V: Don't know.

JS: Prince Andrew.

V: Yes, he would know a lot of the truth. Again, I don't know how much he would be able to help you with, but seeing he's in a lot of trouble himself these days, I think he might, so I think he may be valuable. I'm not too sure of him.

JS: Ok. [REDACTED] I think that's all I have for you. Let me tell you what I would like to do. As I told you in the beginning of this conversation, we've been recording it, and hopefully, we've got a clear enough recording so that we've taken down everything accurately and when it's transcribed, it will be clear and accurate, but what I would like to do is transcribe it, send it to you, have you take a look at it, and if there's anything that we got wrong in the statement, you can write back and you can make changes in the transcript so that the transcript is accurate. Is that fair?

V: No worries. That is fair. No problem.

JS: Alright, great. I really do appreciate that and tell me what the best way is to send the transcript to you.

V: Email. If you just want to send it by email or if you want to send it by mail, either or.

JS: Ok. Give me your email address if you would please.

V: [REDACTED] *

JS: Let me read that back to you: [REDACTED] *

V: Yep that's it.

BE: Thank you Jenna, appreciate it.

V: No problem, Brad.

JS: Thank you very very much. Bye Bye now.

V: Take care Jack. Nice meeting you.

JS: You too.

*Redaction has been made at the request of the witness.

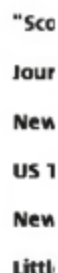
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Diary Entries Of 'Teen Sex Slave' Detail Sordid Hook-Up With Prince Andrew

Prince Andrew Busted At Buckingham Palace [newser.com](#)

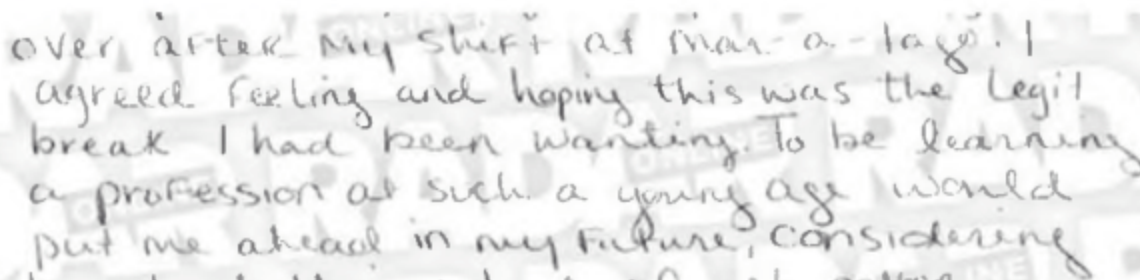
One of Epstein's "sex slaves," [REDACTED], was just 15 when she met the sick predator in September 1998, and she detailed in her diary — exclusively obtained by Radar — how a chance meeting at her part-time job in the spa at **Donald Trump's** luxury Palm Beach, Florida, resort Mar-a-Lago changed her life forever.

Roberts was sitting in the spa and reading an anatomy book, because her goal was to eventually pursue a career in massage therapy. A "striking beautiful woman with dark hair and large brown eyes" approached her, and the two struck up a conversation, she claims in the entry. The lady introduced herself as **Ghislaine Maxwell** and revealed she worked for "a very wealthy gentleman who was always on the lookout for a new masseuse."

PHOTOS: The Royal Family Revealed: Secrets William, Kate & Harry Don't Want You To Know

At first Roberts tried to explain that she never had any training, but Maxwell insisted she come by her boss's nearby mansion anyway [REDACTED] claimed.

"I agreed feeling and hoping this was the legit break I had been wanting. To be learning a profession at such a young age would put me ahead in my future..." she wrote in her diary.



over after my shift at Mar-a-Lago. I agreed feeling and hoping this was the legit break I had been wanting. To be learning a profession at such a young age would put me ahead in my future, considering

[REDACTED] immediately went to find her dad, who also worked at Mar-a-Lago. "I'm going to be a masseuse for the rich and famous, just like the women I see in the spa," she recalled telling him.

PHOTOS: Shocking Scandals Of The Royal Family

[REDACTED] father drove her to this mystery man's mansion so he could check out the situation. "My dad, like me, was only told the part of the offer that

sounded good to any young teen or hopeful parent," wrote [REDACTED] of the situation.

After thirty minutes of chit chat with Maxwell, she wrote, "my dad left, convinced I was on the right path."

With her dad out of the way, Maxwell led the teenager through the mansion until they reached a large bathroom with a steam room, according to the diary.

PHOTOS: Prince William & Kate Meet Jay-Z & Beyonce At Nets Basketball Game

"My first impression of the lavish settings was astonished," wrote [REDACTED]
 "Then I turned to the direction where Ms. Maxwell's attention was focused, almost bedazzled by the décor I shook out of my entranced state and tried not to gawk at the naked man that lay atop a massage table."

"Unaware of what was actually supposed to take place momentarily, I acted calm and cool," continued [REDACTED] "She introduced Jeffrey Epstein as a multi-billion dollar banker and stock broker that took delight in a massage at least once a day."

other side, surrounded by marble. My 1st impression on the lavish settings was astonished. Then I turned to the direction where Ms. Maxwell's attention was focused, almost bedazzled by the decor I shook out of my ~~entranced~~ ^{entranced} state and tried not to gawk at the naked man that lay atop a massage table. Unaware of what was actually supposed to take place momentarily, I acted calm & cool. She introduced Jeffrey Epstein as a multi-billion dollar banker and stock broker that took delight in a massage at least once a day. He finally spoke and

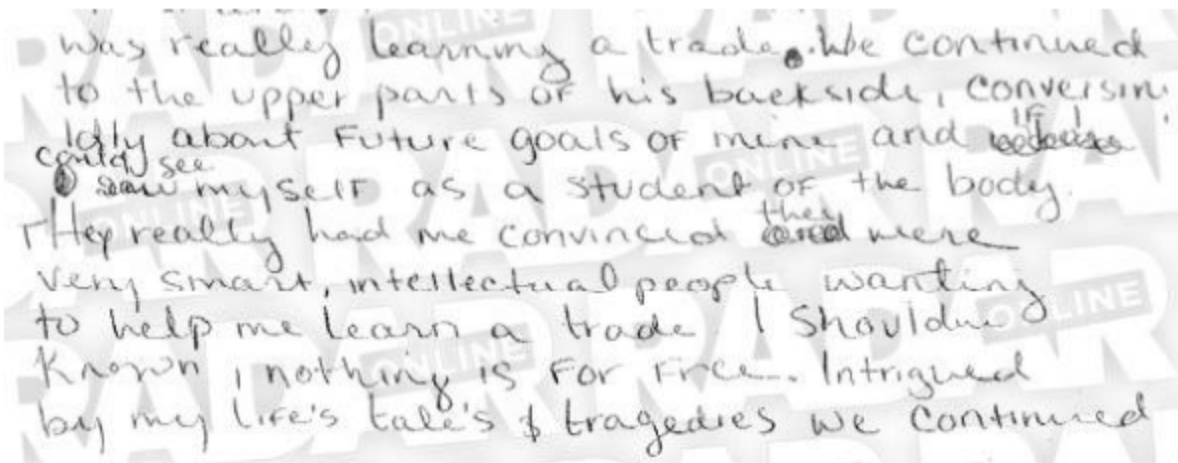
When Epstein finally spoke to the girl, she claimed that he thanked her for coming and told her it was "very nice to meet such a pleasant young lady."

PHOTOS: Prince William Taking Paternity Leave And 24 Other Things You Didn't Know About The Royal Birth

But according to her account the niceties ended there.

With the naked Epstein lying face down, she claimed Maxwell showed [REDACTED] how to massage the man's toes, back and other parts of his body, all the while they discussed the girl's future goals.

Wrote [REDACTED] they really had me convinced they were smart, intellectual people wanting to help me learn a trade. I should've known nothing is for free."



was really learning a trade. He continued to the upper parts of his backside, conversing with me about future goals of mine and ~~we~~ ^{could see} saw myself as a student of the body. They really had me convinced ~~and~~ ^{they} were very smart, intellectual people wanting to help me learn a trade. I should've known, nothing is for free. Intrigued by my life's tale's & tragedies we continued

Soon, she wrote in the entry, Epstein flipped over on his back to reveal his manhood. "Ms. Maxwell then took off her shirt and bra to unveil her large breasts and began to rub them along Jeffrey's torso," wrote Roberts. "She came up behind me after a brief moment and started to undress me."

[REDACTED] was in a "hypnotic state of shock" during the transformed massage session, she claimed.

"I didn't know why this was happening but I knew what they desired me to do."

PHOTOS: 40 Of The Biggest Secrets & Scandals Of 2014!

"I was asked to indulge Jeffrey in oral sex while Ghislane caressed me from behind, cupping my small breasts and feeling me inside," wrote [REDACTED] in the diary obtained by Radar. "I was inclined to scream out of humiliation for being so damned naïve..."

Feeling me inside. I was inclined to scream out of humiliation for being so damned naïve again, but I didn't know how too, it never came. Jeffrey moaned out of delight.

"Jeffrey moaned out of delight and pulled up my chin to look at me then guided my hips to sit on top of him, he next forcibly entered me and used his hips to gratify his sexual needs," [REDACTED] claimed of the sexual assault. "As soon as it was over, I quickly got dressed, and not sure how to keep my composure, just kept quiet."

never came. Jeffrey moaned out of delight and pulled up my chin to look at me then guided my hips to sit on top of him, he next forcibly entered me and used his hips to gratify his sexual needs. As soon as it was over, I quickly got dressed, and not sure how to keep my composure just kept quiet. They both thanked me for a job well done as I had passed my trial, I was now a hired prostitute being told I

Epstein gave [REDACTED] \$200 for her two-hour session and the "deeply ashamed" girl headed home to process what had just happened to her, she alleged.

Keep checking RadarOnline.com for more explosive revelations from the secret private diary of Epstein's "sex slave."



By Radar Staff

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CharlizeAngelz · 11 days ago

yeah. and instead of going to the police she made a choice and kept on going back for more. She was not a sex slave. She is a prostitute. Sicko daddy for dropping her off and not checking things out himself either.

40 ^ | v · Reply · Share

snowmobilejer → CharlizeAngelz · 11 days ago

You are a dumbass.

13 ^ | v · Reply · Share

Charlene → CharlizeAngelz · 11 days ago

Exactly, she only became a "sex slave" when she realized she could make money from selling her lies to the tabloids!!

10 ^ | v · Reply · Share

[Livefr1031](#) • 11 days ago

Sure is fun to talk smack about 15 year old rape victim, isn't it? Fun times. ha ha ha...go back to stroking your hairless cat Dr. Evil.

21 ^ | v • Reply • Share ›

[snowmobilejer](#) • 11 days ago

Way to protect your daughter Dad. If dropping her off at a mansion for a massage by an underage girl isn't a red flag, well then I don't know what is. Her father should also be held accountable. In my humble opinion he is a despicable accessory. That poor girl was naive and 15!!!!!! At that age, most girls are innocent, and easily overpowered. They do not have the psychological tools to deal with a situation like that. She was ambushed. If I was the father, there would have been 1 dead Billionaire, and 1 dead Maxwell, end of story. I would have had no problem snuffing out the life of a pedophile like that if this had been my daughter.

25 ^ | v • Reply • Share ›

[justme4](#) → [snowmobilejer](#) • 11 days ago

I'd gladly to prison for killing this POS

4 ^ | v • Reply • Share ›

[SisterRottenCrotch](#) • 11 days ago

This piece of excrement Epstein, got SUCH a sweetheart deal and he should be doing life for what he's done and how many lives he's destroyed, he's the very definition of a predator

15 ^ | v • Reply • Share ›

[Livefr1031](#) • 11 days ago

She was 15. She is the very definition of a victim of human trafficking. Calling her names in this forum is beyond contempt. Also, her dad is an idiot.

29 ^ | v • Reply • Share ›

[Nahhdas](#) • 11 days ago

She was 15... so please, don't blame her.

19 ^ | v • Reply • Share ›

[sunni_daze](#) • 11 days ago

I find it funny that they are not focusing on Andrew, yet they are putting all this energy into Epstein. Aren't they both pedo freaks that need to be locked up?

10 ^ | v • Reply • Share ›

[SisterRottenCrotch](#) → [sunni_daze](#) • 11 days ago

I know! He's just as culpable and just as perverse as Epstein, he's the reason WHY Epstein got the deal he did, it's outrageous.

8 ^ | v • Reply • Share ›

Chris Cock → sunni_daze • 10 days ago

Andrew is a Co-conspirator named in the lawsuit along with Alan worshiwitz (or whatever his name is) but the case is actually against Epstein.

1 ^ | v • Reply • Share ›

sunni_daze → Chris Cock • 10 days ago

But they are both pedophile freaks, right?

1 ^ | v • Reply • Share ›

Kevin Bacon • 11 days ago

.....But you came back though. Don't have us feel sorry for you when you returned for more. The three women who were kidnapped for years in Cleveland were sex slaves. This idiot isn't.

9 ^ | v • Reply • Share ›

spottedgiraffe → Kevin Bacon • 9 days ago

Correct. She was an underaged prostitute which is statutory rape, but she was not a sex slave. They are two completely different things.

5 ^ | v • Reply • Share ›

Kevin Bacon → spottedgiraffe • 9 days ago

At 17 she knew what she was doing. At that age you are aware of the law and should've got some outside help the first time. But no she kept going back. I don't feel bad for her. Don't cry you were humiliated then turn around and come back to the people you said hurt you.

3 ^ | v • Reply • Share ›

Madisyn, Hate "Check" Queen • 11 days ago

Uhh, haven't we seen this thread **48** times already??

7 ^ | v • Reply • Share ›

Charlene → Madisyn, Hate "Check" Queen • 11 days ago

Yup, and we'll keep on seeing this non-story a million times unfortunately. Like I've said before she is only in this for the money, and for ROL to keep referring to this idiot as a "sex slave" is ridiculous! She's was no more of a "sex slave" than the little old grannie next door!

4 ^ | v • Reply • Share ›

Livfvr1031 → Charlene • 11 days ago

You are a horrible human being. That is all.

9 ^ | v • Reply • Share ›

Stacey Bridges • 11 days ago

Isn't Jeffery Epstein friends with Woody Allen, Bill Clinton and Prince Andrew???

If they're NOT friends they have been photographed with Jeffrey Epstein at one of his parties on his island.

This is Satanic debauchery in the name of sex, greed and child sacrifice.

Pure EVIL, even worse these people pretend to care about you. . .

These are DEMONS walking on EARTH!

7 ^ | v • Reply • Share ›

PegNew • 11 days ago

I feel REALLY bad for this young lady! However, this story will be buried now that Bill Clinton's name has been tied to it!

6 ^ | v • Reply • Share ›

justme4 → PegNew • 11 days ago

You seem to be infatuated with Clinton because all your comments have his name in it. Wtf does he have to do with this?

4 ^ | v • Reply • Share ›

Elaphros → justme4 • 11 days ago

I believe that ROL has mentioned that Clinton was a visitor to the island that Epstein owned ... so this PegNew character is running with it and claiming that since he was on the island he was one of the individuals that was involved in the shenanigans. I'm sure Epstein had many guests that weren't involved in any way, to maintain some sort of profile amongst investors and the like. As of yet I don't think the "diary" has referenced anyone but Epstein, Maxwell and Prince Andrew ... although honestly, it doesn't sound like a diary that she kept when she was 15 or 17, the way she's framing things doesn't sound like the way that a teenager would frame them. I suspect if it's a legitimate diary that it's something she started well after ... maybe she had a therapist years later that asked that she do a journal to help with her treatment or something, or maybe she decided to put together a journal so she can release a tell-all book. I dunno, but that's my take on it.

4 ^ | v • Reply • Share ›

spottedgiraffe • 9 days ago

Did they know her age? Radar didn't even bother addressing that. I haven't been following this story did he rape anyone else

^ | v • Reply • Share ›

Wise Joe · 11 days ago

This Becky must be out of her mind. She obviously wanted it.

^ | v · Reply · Share

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EXHIBIT E

January 8 – Inside Edition

SHOW INTRO Now Inside Edition with Debra Norville.

Norville That woman whose lawsuit alleges that she was a sex slave for some very famous public figures is getting support from the young man she dated at the time. Les Trent spoke with him exclusively.

Trent The beautiful woman at the center of an international sex scandal is getting support from of all people her ex-boyfriend. What do you say to people who believe that your former girlfriend, Virginia [REDACTED] making this whole thing up?

Figueroa Anyone who know [REDACTED] – I mean she was pretty honest about it.

Trent Anthony Figueroa was 18 and right out of high school when he began dating 17 year old [REDACTED] She's listed as Jane Doe #3 in a bombshell lawsuit claiming she was forced to have sex when she was 17 with a number of high profile figures including super lawyer Alan Dershowitz. Dershowitz blasted her story to Inside Edition.

Dershowitz She is a complete a total stranger whose made up a complete and total fabrication.

Trent Did she ever mention to you the lawyer Alan Dershowitz?

Figueroa She had never mentioned anything about them having sex or brought up anything like that.

Trent Also dragged into the scandal is England's Prince Andrew.

Figueroa You know she was like oh I'm going to meet the Prince.

Trent [REDACTED] said she had sex with Prince Andrew on three different occasions, but Buckingham Palace calls the shocking allegation "False and without any foundation." She also claims she was kept as a sex slave by disgraced billionaire Jeffery Epstein, who plead guilty in 2008 to soliciting an underage girl for prostitution.

Figueroa She told she was his personal masseuse and that she traveled with him around the world two weeks out of every month.

Trent She's telling about these things that are happening with Epstein

and other men. Why are you still dating her?

Figueroa

She had money, you know – I mean I was a young kid.

Trent

Figueroa and Roberts broke up in 2002 and that's the last time he saw the beauty at the center of the explosive scandal.

EXHIBIT F

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The 11 reveal

Jeffrey Epstein 'sex slave' lived a lavish lifestyle and enjoyed her role as his 'travelling masseuse', former friends claim

- [REDACTED] claims she was recruited to Epstein's harem in 1999
- Named Prince Andrew and Alan Dershowitz as men she had to 'service'
- Her friends say there was no indication she was being held captive
- Asked other women if they knew anyone 'slutty' to bring to Epstein
- Would allegedly use cash she gained from sex to live a luxury lifestyle

By WILLS ROBINSON FOR DAILYMAIL.COM

PUBLISHED: 12:49 EST, 1 March 2015 | UPDATED: 07:09 EST, 2 March 2015

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The woman who has accused Jeffrey Epstein of keeping her as a sex slave was actually a money-hungry sex kitten' who enjoyed her lavish lifestyle, former friends have claimed.

[REDACTED] currently in the midst of a [REDACTED] was recruited to join Epstein's harem of underage women in 1999, naming Prince Andrew and attorney Alan Dershowitz as two of the men she was made to 'service'.

But those who used to be close to the 31-year-old say she relished her role as his 'travelling masseuse' and never acted like she was being held captive.

Philip Guderyon, who used to date [REDACTED] and would drive her to Epstein's Pal Beach, Florida, mansion told the *New York Daily News*: 'She was like the head b***h. She'd have like nine or 10 girls she used to bring to him.

'She never looked like she was being held captive,' he added. 'She and the other girls would walk out of there smiling, with their little bathing suits on, like they had just come from the beach.

'She'd have like \$4,000. And then I'd take them all to the mall and they'd get their nails done.'

He also said while making thousands of dollars from the relationship, she would buy fancy clothes and drive around in Epstein's Mercedes.

Crystal Figueroa, whose brother dated [REDACTED] in the early 2000s, told the *Daily News* [REDACTED] would ask if she knew anyone 'slutty' so they could be sent to Epstein.

In 2001 she was sharing a Palm Beach apartment with Anthony Valladares. He told the *Daily News* that she bragged about going to the



Shocking [REDACTED] friends claim she was a money-hungry sex kitten' who enjoyed her lavish lifestyle

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How NOT to get into a car, by Amal: Mrs Clooney shows off more than intended while celebrating her first wedding anniversary with George



Business as usual! Amal Clooney is suited