

**UNITED STATES COURT OF APPEALS
FOR THE
SECOND CIRCUIT**

At a stated term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 9th day of August, two thousand nineteen.

Julie Brown, Miami Herald Media Company,

Intervenors - Appellants.

v.

Ghislaine Maxwell,

Defendant - Appellee,

v.

Virginia L. Giuffre,

Plaintiff - Appellee.

ORDER

Docket No: 18-2868

Appellee, Ghislaine Maxwell, filed a petition for panel rehearing, or, in the alternative, for rehearing *en banc*. The panel that determined the appeal has considered the request for panel rehearing, and the active members of the Court have considered the request for rehearing *en banc*.

IT IS HEREBY ORDERED that the petition is denied.

FOR THE COURT:

Catherine O'Hagan Wolfe, Clerk

A circular official seal of the United States Court of Appeals for the Second Circuit is positioned over the signature. The seal features the text "UNITED STATES" at the top, "SECOND CIRCUIT" in the center, and "COURT OF APPEALS" at the bottom, with stars on either side of the center text.

Selected docket entries for case 18–2868

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**UNITED STATES COURT OF APPEALS
FOR THE
SECOND CIRCUIT**

At a Stated Term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 9th day of August, two thousand nineteen.

Before: José A. Cabranes,
Rosemary S. Pooler,
Christopher F. Droney,
Circuit Judges.

Julie Brown, Miami Herald Media Company,

Intervenors - Appellants,

v.

Ghislaine Maxwell,

Defendant - Appellee,

v.

Virginia L. Giuffre,

Plaintiff - Appellee.

Alan M. Dershowitz, Michael Cernovich,
DBA Cernovich Media,

Intervenors - Appellants,

v.

Virginia L. Giuffre,

Plaintiff - Appellee,

v.

Ghislaine Maxwell,

Defendant-Appellee.

ORDER


18-2868

16-3945(L)
17-1625(Con)
17-1722(Con)

IT IS HEREBY ORDERED that the Clerk is directed to issue the mandate forthwith.

For the Court:

Catherine O'Hagan Wolfe,
Clerk of Court


The signature is written in black ink and is partially obscured by a circular court seal. The seal is red and white with the text "UNITED STATES", "SECOND CIRCUIT", and "COURT OF APPEALS".

UNITED STATES COURT OF APPEALS
FOR THE
SECOND CIRCUIT

MANDATE

At a Stated Term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 3rd day of July, two thousand and nineteen.

Before: José A. Cabranes,
Rosemary S. Pooler,
Christopher F. Droney,
Circuit Judges.

Julie Brown, Miami Herald Media Company,

Intervenors - Appellants.

v.

Ghislaine Maxwell,

Defendant - Appellee,

v.

Virginia L. Giuffre,

Plaintiff - Appellee.

JUDGMENT

Docket Nos. 18-2868

The appeal in the above captioned case from a judgment of the United States District Court for the Southern District of New York was argued on the district court's record and the parties' briefs. Upon consideration thereof,

IT IS HEREBY ORDERED, ADJUDGED and DECREED that the orders of the District Court entered on November 2, 2016, May 3, 2017, and August 27, 2018 are VACATED. The Court further ORDERS the unsealing of the summary judgment record as described in its opinion. The case is REMANDED to the District Court for a particularized review of the remaining materials.

For the Court:

Catherine O'Hagan Wolfe,
Clerk of Court

A True Copy

Catherine O'Hagan Wolfe, Clerk

United States Court of Appeals, Second Circuit

Catherine O'Hagan Wolfe

Catherine O'Hagan Wolfe

MANDATE ISSUED ON 08/09/2019

18-2868; 16-3945-cv(L)

Brown v. Maxwell; Dershowitz v. Giuffre

In the
United States Court of Appeals
for the Second Circuit

AUGUST TERM 2018

No. 18-2868-cv

JULIE BROWN, MIAMI HERALD COMPANY,
Intervenors-Appellants,

v.

GHISLAINE MAXWELL,
Defendant-Appellee,

v.

VIRGINIA L. GIUFFRE,
Plaintiff-Appellee.

No. 16-3945-cv(L)

No. 17-1625 (CON)

No. 17-1722(CON)

ALAN M. DERSHOWITZ, MICHAEL CERNOVICH, DBA CERNOVICH
MEDIA,
Intervenors-Appellants,

V.

VIRGINIA L. GIUFFRE,
Plaintiff-Appellee,

v.

GHISLAINE MAXWELL,
*Defendant-Appellee.**

On Appeal from the United States District Court
for the Southern District of New York

ARGUED: MARCH 6, 2019
DECIDED: JULY 3, 2019

Before: CABRANES, POOLER, and DRONEY, *Circuit Judges.*

Intervenors-Appellants Alan Dershowitz, Michael Cernovich, and the Miami Herald Company (with reporter Julie Brown) appeal from certain orders of the United States District Court for the Southern District of New York (Robert W. Sweet, *Judge*) denying their respective motions to unseal filings in a defamation suit. We conclude that the

* The Clerk of Court is directed to amend the captions as set out above.

District Court failed to conduct the requisite particularized review when ordering the sealing of the materials at issue. At the same time, we recognize the potential damage to privacy and reputation that may accompany public disclosure of hard-fought, sensitive litigation. We therefore clarify the legal tools that district courts should use in safeguarding the integrity of their dockets. Accordingly, we **VACATE** the District Court's orders entered on November 2, 2016, May 3, 2017, and August 27, 2018, **ORDER** the unsealing of the summary judgment record as described further herein, and **REMAND** the cause to the District Court for particularized review of the remaining sealed materials.

Judge Pooler concurs in this opinion except insofar as it orders the immediate unsealing of the summary judgment record without a remand.

SANFORD L. BOHRER (Christine N. Walz, Madelaine J. Harrington, New York, NY, *on the brief*), Holland & Knight LLP, Miami, FL, *for Intervenor-Appellants Julie Brown and Miami Herald*.

TY GEE (Adam Mueller, *on the brief*), Haddon, Morgan and Foreman, P.C., Denver, CO, *for Defendant-Appellee Ghislaine Maxwell*.

PAUL G. CASSELL (Sigrid S. McCawley, Boies Schiller Flexner LLP, Ft. Lauderdale, FL, *on the brief*), S.J Quinney College of Law, University of Utah, Salt Lake City, UT, *for Plaintiff-Appellee Virginia L. Giuffre*.

ANDREW G. CELLI JR. (David A. Lebowitz, *on the brief*), Emery, Celli, Brinckerhoff & Abady LLP, New York, NY, *for Intervenor-Appellant Alan M. Dershowitz*.

MARC RANDAZZA (Jay Marshall Wolman, Las Vegas, NV, *on the brief*), Randazza Legal Group, PLLC, Hartford, CT, *for Intervenor-Appellant Michael Cernovich*.

JOSÉ A. CABRANES, *Circuit Judge*:

Intervenors-Appellants Alan M. Dershowitz (“Dershowitz”), Michael Cernovich (“Cernovich”), and the Miami Herald Company (with reporter Julie Brown, jointly the “*Herald*”) appeal from certain orders of the United States District Court for the Southern District of New York (Robert W. Sweet, *Judge*) denying their respective motions to unseal filings in a defamation suit. We conclude that the District Court failed to conduct the requisite particularized review when ordering the sealing of the materials at issue. At the same time, we

recognize the potential damage to privacy and reputation that may accompany public disclosure of hard-fought, sensitive litigation. We therefore clarify the legal tools that district courts should use in safeguarding the integrity of their dockets. Accordingly, we **VACATE** the District Court's orders entered on November 2, 2016, May 3, 2017, and August 27, 2018, **ORDER** the unsealing of the summary judgment record as described further herein, and **REMAND** the cause to the District Court for particularized review of the remaining sealed materials.

I. BACKGROUND

A. Jeffrey Epstein's Conviction and the CVRA Suit

The origins of this case lie in a decade-old criminal proceeding against financier Jeffrey Epstein ("Epstein"). On June 30, 2008, Epstein pleaded guilty to Florida state charges of soliciting, and procuring a person under the age of eighteen for, prostitution. The charges stemmed from sexual activity with privately hired "masseuses," some of whom were under eighteen, Florida's age of consent. Pursuant to an agreement with state and federal prosecutors, Epstein pleaded to the state charges. He received limited jail-time, registered as a sex offender, and agreed to pay compensation to his victims. In return, prosecutors declined to bring federal charges.

Shortly after Epstein entered his plea, two of his victims, proceeding as "Jane Doe 1" and "Jane Doe 2," filed suit against the Government in the Southern District of Florida under the Crime Victims' Rights Act ("CVRA"). The victims sought to nullify the plea

agreement, alleging that the Government failed to fulfill its legal obligations to inform and consult with them in the process leading up to Epstein's plea deal.¹

On December 30, 2014, two additional unnamed victims—one of whom has now self-identified as Plaintiff-Appellee Virginia Giuffre ("Giuffre")—petitioned to join in the CVRA case. These petitioners included in their filings not only descriptions of sexual abuse by Epstein, but also new allegations of sexual abuse by several other prominent individuals, "including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders," as well as Dershowitz (a long-time member of the Harvard Law School faculty who had worked on Epstein's legal defense) and Defendant-Appellee Ghislaine Maxwell ("Maxwell").²

Dershowitz moved to intervene, seeking to "strike the outrageous and impertinent allegations made against him and to request a show cause order to the attorneys that have made them."³ Exercising its authority to "strike from a pleading an insufficient

¹ On February 21, 2019, the Florida District Court ruled that federal prosecutors had violated the CVRA by failing to adequately notify the two victims-plaintiffs of the plea deal. The District Court has not yet determined the appropriate remedy. *See Doe 1 v. United States*, 359 F. Supp. 3d 1201, 1204–17 (S.D. Fla. 2019).

² *Doe 1 v. United States*, No. 08-CV-80736-KAM, 2015 WL 11254692, at *2 (S.D. Fla. Apr. 7, 2015) (internal quotation marks omitted).

³ *Id.* (internal quotation marks and brackets omitted).

defense or any redundant, immaterial, impertinent, or scandalous matter . . . on its own,”⁴ the Florida District Court (Kenneth A. Marra, *Judge*) *sua sponte* struck all allegations against additional parties from the pleadings, including those against Dershowitz, and therefore denied Dershowitz’s motion as moot.⁵

The stricken allegations, however, quickly found their way into the press, and several media outlets published articles repeating Giuffre’s accusations. In response to the allegations, on January 3, 2015, Maxwell’s publicist issued a press statement declaring that Giuffre’s allegations “against Ghislaine Maxwell are untrue” and that her “claims are obvious lies.”⁶

B. Giuffre Sues Maxwell

On September 21, 2015, Giuffre filed the underlying action against Maxwell in the Southern District of New York. Giuffre alleged that Maxwell had defamed her through this and other public statements. Extensive and hard-fought discovery followed. Due to the volume of sealing requests filed during discovery, on August 9, 2016, the District Court entered a Sealing Order that effectively ceded control of the sealing process to the parties themselves. The Sealing Order disposed of the requirement that the parties file individual letter briefs to request sealing and prospectively granted all of the parties’

⁴ Fed. R. Civ. P. 12(f).

⁵ *Doe 1*, 2015 WL 11254692, at *2–3.

⁶ *See Giuffre v. Maxwell*, 325 F. Supp. 3d 428, 434 (S.D.N.Y. 2018).

future sealing requests. In total, 167 documents—nearly one-fifth of the docket—were filed under seal. These sealed documents include, *inter alia*, motions to compel discovery, motions for sanctions and adverse inferences, motions *in limine*, and similar material.

On January 6, 2017, Maxwell filed a motion for summary judgment. The parties submitted their memoranda of law and supporting exhibits contesting this motion under seal. On March 22, 2017, the District Court denied the motion in a heavily redacted 76-page opinion. Once again, the entire summary judgment record, including the unredacted version of the District Court opinion denying summary judgment, remained under seal. On May 24, 2017, Maxwell and Giuffre executed a settlement agreement, and the case was closed the next day.

C. Motions to Intervene and Unseal

Over the course of the litigation before Judge Sweet, three outside parties attempted to unseal some or all of the sealed material. On August 11, 2016, Dershowitz moved to intervene, seeking to unseal three documents that, he argues, demonstrate that Giuffre invented the accusations against him. On January 19, 2017, Cernovich, an independent blogger and self-described “popular political journalist,”⁷ moved to intervene, seeking to unseal the summary judgment record, and Dershowitz joined his motion. On April 6, 2018, after the case had settled, the *Herald* moved to intervene and unseal

⁷ Br. Appellant (Cernovich) 4.

the entire docket. The District Court granted each of these motions to intervene, but denied the related requests to unseal in orders entered November 2, 2016, May 3, 2017, and August 27, 2018, respectively.

The Appellants timely appealed from each of the orders denying their respective motions to unseal. Although each Appellant seeks the release of a different set of documents, all argue that the District Court failed to analyze the documents individually or properly apply the presumption of public access to court documents. We therefore ordered that the appeals be heard in tandem and held argument on March 6, 2019.

On March 11, 2019, we issued an order to show cause why we “should not unseal the summary judgment motion, including any materials filed in connection with this motion, and the District Court’s summary judgment decision.”⁸ The parties timely filed their responses.

II. DISCUSSION

There are two categories of sealed material at issue in these appeals: (1) the summary judgment record, which includes the parties’ summary judgment briefs, their statements of undisputed facts, and incorporated exhibits; and (2) court filings made in the course of the discovery process and with respect to motions *in limine*. In this Opinion, we explain that our law requires the unsealing of the

⁸ *Giuffre v. Maxwell*, No. 18-2868-cv, Docket No. 138.

summary judgment materials and individualized review of the remaining sealed materials.

While the law governing public access to these materials is largely settled, we have not yet adequately addressed the potential harms that often accompany such access. These harms are apparent. Over forty years ago, the Supreme Court observed that, without vigilance, courts' files might "become a vehicle for improper purposes."⁹ Our legal process is already susceptible to abuse. Unscrupulous litigants can weaponize the discovery process to humiliate and embarrass their adversaries. Shielded by the "litigation privilege,"¹⁰ bad actors can defame opponents in court pleadings or depositions without fear of lawsuit and liability. Unfortunately, the presumption of public access to court documents has the potential to exacerbate these harms to privacy and reputation by ensuring that damaging material irrevocably enters the public record.

We therefore take the opportunity to describe the tools available to district courts in protecting the integrity of the judicial process, and emphasize the courts' responsibility to exercise these powerful tools. We also caution the public to critically assess allegations contained in judicial pleadings.

⁹ *Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 598 (1978).

¹⁰ See notes 46–47 and accompanying text, *post*.

A. *Standard of Review*

When reviewing a district court's decision to seal a filing or maintain such a seal, "we examine the court's factual findings for clear error, its legal determinations de novo, and its ultimate decision to seal or unseal for abuse of discretion."¹¹

B. *The Summary Judgment Materials*

With respect to the first category of materials, it is well-settled that "documents submitted to a court for its consideration in a summary judgment motion are—as a matter of law—judicial documents to which a strong presumption of access attaches, under both the common law and the First Amendment."¹² In light of this strong First Amendment presumption, "continued sealing of the documents may be justified only with specific, on-the-record findings that sealing is necessary to preserve higher values and only if the sealing order is narrowly tailored to achieve that aim."¹³

¹¹ *Bernstein v. Bernstein Litowitz Berger & Grossmann LLP*, 814 F.3d 132, 139 (2d Cir. 2016).

¹² *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 121 (2d Cir. 2006). We observe that our holding in *Lugosch* relies on the general principle that parties may "be assumed to have supported their papers with admissible evidence and non-frivolous arguments." *Id.* at 122. Insofar as a district court has, through striking a filing, specifically found that assumption inapplicable, the categorical rule in *Lugosch* may not apply. See notes 42–43 and accompanying text, *post*.

¹³ *Id.* at 124. Examples of such countervailing values may include, depending on the circumstances, preserving "the right of an accused to fundamental fairness in the jury selection process," *Press-Enter. Co. v. Superior Court*

In this case, the District Court erred in several respects.¹⁴ First, it failed to give proper weight to the presumption of access that attaches to documents filed in connection with summary judgment motions. The District Court reasoned that the summary judgment materials were “entitled to a lesser presumption of access” because “summary judgment was denied by the Court.”¹⁵ In assigning a “lesser presumption” to such materials, the District Court relied on a single sentence of dicta from our decision in *United States v. Amodeo*.¹⁶ We have since clarified, however, that this sentence was based on a “quotation from a partial concurrence and partial dissent in the D.C. Circuit . . . [and] is thus not the considered decision of either this court or the D.C. Circuit.”¹⁷ In fact, we have expressly rejected the proposition that “different types of documents might receive different

of *California, Riverside Cty.*, 464 U.S. 501, 510 (1984); the protection of attorney-client privilege, *Lugosch*, 435 F.3d at 125; “the danger of impairing law enforcement or judicial efficiency,” *SEC. v. TheStreet.Com*, 273 F.3d 222, 232 (2d Cir. 2001); and “the privacy interest of those who resist disclosure,” *id.*

¹⁴ Our discussion here focuses specifically on the District Court’s denial of the *Herald’s* motion to unseal the entire record. Because this decision grants relief to all Appellants, we need not discuss any separate, additional error in the District Court’s denial of the earlier motions to unseal.

¹⁵ *Giuffre*, 325 F. Supp. 3d at 444.

¹⁶ 71 F.3d 1044, 1049 (2d Cir. 1995) (“*Amodeo II*”) (“One judge [in the District of Columbia Circuit] has pointed out, for example, that where a district court *denied* the summary judgment motion, essentially postponing a final determination of substantive legal rights, the public interest in access is not as pressing.” (internal quotation marks omitted; emphasis in original)).

¹⁷ *Lugosch*, 435 F.3d at 121.

weights of presumption based on the extent to which they were relied upon in resolving [a] motion [for summary judgment].”¹⁸

Second, in contravention of our precedent, the District Court failed to review the documents individually and produce “specific, on-the-record findings that sealing is necessary to preserve higher values.”¹⁹ Instead, the District Court made generalized statements about the record as a whole.²⁰ This too was legal error.

Finally, upon reviewing the summary judgment materials in connection with this appeal, we find that there is no countervailing privacy interest sufficient to justify their continued sealing. Remand with respect to these documents is thus unnecessary. Accordingly, and to avoid any further delay,²¹ we order that the summary judgment documents (with minimal redactions) be unsealed upon issuance of our mandate.²²

¹⁸ *Id.* at 123.

¹⁹ *Id.* at 124.

²⁰ *See, e.g., Giuffre*, 325 F. Supp. 3d at 445 (summarily concluding that all “[t]he Summary Judgment Judicial Documents openly refer to and discuss these allegations [of sexual assault and sexual trafficking] in comprehensive detail, and that those allegations “establish[] a strong privacy interest here”).

²¹ *Cf. Lugosch*, 435 F.3d at 127 (ordering that “the mandate shall issue forthwith” to expedite the unsealing process).

²² Upon issuance of our mandate, a minimally redacted version of the summary judgment record will be made accessible on the Court of Appeals docket. We have implemented minimal redactions to protect personally identifying information such as personal phone numbers, contact lists, birth dates, and social

C. The Remaining Sealed Materials

The law governing disclosure of the remaining sealed material in this case is only slightly more complex. The Supreme Court has recognized a qualified right “to inspect and copy judicial records and documents.”²³ In defining “judicial records and documents,” we have emphasized that “the mere filing of a paper or document with the court is insufficient to render that paper a judicial document subject to the right of public access.”²⁴ Instead, “the item filed must be relevant to the performance of the judicial function and useful in the judicial process in order for it to be designated a judicial document.”²⁵

As our precedent makes clear, a court “perform[s] the judicial function” not only when it rules on motions currently before it, but also when properly exercising its inherent “supervisory powers.”²⁶ A

security numbers. We have also redacted the names of alleged minor victims of sexual abuse from deposition testimony and police reports, as well as deposition responses concerning intimate matters where the questions were likely only permitted—and the responses only compelled—because of a strong expectation of continued confidentiality. *See* Fed. R. Civ. P. 5.2. While we appreciate the views expressed in Judge Pooler’s separate opinion, the panel majority believes that the efforts invested by three former district judges in reviewing these materials adequately address those concerns.

²³ *Nixon*, 435 U.S. at 597–98.

²⁴ *United States v. Amodeo*, 44 F.3d 141, 145 (2d Cir. 1995) (“*Amodeo I*”).

²⁵ *Id.*

²⁶ *Cf. United States v. HSBC Bank USA, N.A.*, 863 F.3d 125, 135 (2d Cir. 2017) (explaining that, in considering whether the report of a monitor charged with assessing compliance with a deferred prosecution agreement is a judicial

document is thus “relevant to the performance of the judicial function” if it would reasonably have the *tendency* to influence a district court’s ruling on a motion or in the exercise of its supervisory powers, without regard to which way the court ultimately rules or whether the document ultimately in fact influences the court’s decision.²⁷ Accordingly, if in applying these standards, a court determines that documents filed by a party are *not* relevant to the performance of a judicial function, no presumption of public access attaches.²⁸

Once an item is deemed relevant to the exercise of judicial power, “the weight to be given the presumption of access must be governed by the role of the material at issue in the exercise of Article III judicial power and the resultant value of such information to those

document, “[i]f the district court’s conception of its supervisory power in this context were correct, the Monitor’s Report would quite obviously be relevant to the performance of the judicial function and useful in the judicial process” (internal quotation marks omitted)). Whether a specific judicial decision constitutes a “performance of the judicial function” is a question of law. Accordingly, we review such determinations *de novo*. *Id.* at 134.

²⁷ *Amodeo I*, 44 F.3d at 145–46 (concluding that documents were relevant to the performance of a judicial function because they would have “informed” the district court’s decision whether to discharge or retain a Receiver); *see also* *FTC. v. Standard Fin. Mgmt. Corp.*, 830 F.2d 404, 409 (1st Cir. 1987) (citing Federal Rule of Evidence 401’s “having any tendency” definition of relevance in determining whether documents were “judicial documents”).

²⁸ As we explain below, there are several (often preferable) tools beyond sealing that district courts can use to protect their dockets from becoming a vehicle for irrelevant—and potentially defamatory—accusations. *See* Section D, *post*.

monitoring the federal courts.”²⁹ Thus, while evidence introduced at trial or in connection with summary judgment enjoys a strong presumption of public access, documents that “play only a negligible role in the performance of Article III duties” are accorded only a low presumption that “amounts to little more than a prediction of public access absent a countervailing reason.”³⁰ Documents that are never filed with the court, but simply “passed between the parties in discovery, lie entirely beyond the presumption’s reach.”³¹

The remaining sealed materials at issue here include filings related to, *inter alia*, motions to compel testimony, to quash trial subpoenae, and to exclude certain deposition testimony. All such motions, at least on their face, call upon the court to exercise its Article III powers. Moreover, erroneous judicial decision-making with respect to such evidentiary and discovery matters can cause substantial harm. Such materials are therefore of value “to those monitoring the federal courts.”³² Thus, all documents submitted in connection with, and relevant to, such judicial decision-making are subject to at least some presumption of public access.³³

²⁹ *Amodeo II*, 71 F.3d at 1049.

³⁰ *Id.* at 1050.

³¹ *Id.*

³² *Id.* at 1049.

³³ In previous decisions, we have identified an important exception to this general rule: the presumption of public access does *not* apply to material that is submitted to the court solely so that the court may decide whether that same

Although a court's authority to oversee discovery and control the evidence introduced at trial surely constitutes an exercise of judicial power, we note that this authority is ancillary to the court's core role in adjudicating a case. Accordingly, the presumption of public access in filings submitted in connection with discovery disputes or motions *in limine* is generally somewhat lower than the presumption applied to material introduced at trial, or in connection with dispositive motions such as motions for dismissal or summary judgment.³⁴ Thus, while a court must still articulate specific and substantial reasons for sealing such material, the reasons usually need not be as compelling as those required to seal summary judgment filings.

Here, the precise basis for the District Court's decision to deny the motion to unseal these remaining materials is unclear. In the three paragraphs devoted to the issue, the District Court emphasized the potential for embarrassment "given the highly sensitive nature of the underlying allegations," and concluded that "the documents sealed in the course of discovery were neither relied upon by [the District] Court in the rendering of an adjudication, nor necessary to or helpful in resolving a motion."³⁵ It is therefore unclear whether the District Court held that these materials were not judicial documents (and thus are

material must be disclosed in the discovery process or shielded by a Protective Order. See *TheStreet.Com*, 273 F.3d at 233.

³⁴ *Amodeo II*, 71 F.3d at 1049–50.

³⁵ *Giuffre*, 325 F. Supp. 3d. at 442 (internal quotation marks and brackets omitted).

not subject to a presumption of public access), or found that privacy interests outweighed a limited right of public access.

On either interpretation, however, the District Court's holding was error. Insofar as the District Court held that these materials are not judicial documents because it did not rely on them in adjudicating a motion, this was legal error. As explained above, the proper inquiry is whether the documents are relevant to the performance of the judicial function, not whether they were relied upon.³⁶ Indeed, decision-makers often find that a great deal of relevant material does not ultimately sway their decision. And insofar as the District Court held that privacy interests outweigh the presumption of public access in each of the thousands of pages at issue, that decision—which appears to have been made without particularized review—amounts to an abuse of discretion.³⁷

In light of the District Court's failure to conduct an individualized review of the sealed materials, it is necessary to do so now. We believe the District Court is best situated to conduct this review. The District Court can directly communicate with the parties, and can therefore more swiftly and thoroughly consider particular objections to unsealing specific materials. Relatedly, the District Court can obtain the parties' assistance in effecting any necessary redactions, and in notifying any outside parties whose privacy interests might be

³⁶ See text accompanying notes 12–18 and 26–28, *ante*.

³⁷ See *In re City of New York*, 607 F.3d 923, 943 n.21 (2d Cir. 2010) (explaining that “abuse of discretion” is a nonpejorative, legal “term of art”).

implicated by the unsealing. Accordingly, we remand the cause to the District Court to conduct such a particularized review and unseal all documents for which the presumption of public access outweighs any countervailing privacy interests.

D. Protecting the Integrity of Judicial Proceedings

While we disagree with the District Court's disposition of the motions to unseal, we share its concern that court files might be used to "promote scandal arising out of unproven potentially libelous statements."³⁸ We therefore describe certain methods courts can employ to protect the judicial process from being coopted for such purposes.

The Supreme Court has explained that "[e]very court has supervisory power over its own records and files" to ensure they "are not used to gratify private spite or promote public scandal" or "serve as reservoirs of libelous statements for press consumption."³⁹ This supervisory function is not only within a district court's power, but also among its responsibilities.

In practice, district courts may employ several methods to fulfill this function. They may, for instance, issue protective orders forbidding dissemination of certain material "to protect a party or person from annoyance, embarrassment, oppression, or undue

³⁸ *Giuffre*, 325 F. Supp. 3d at 447.

³⁹ *Nixon*, 435 U.S. at 598 (internal quotation marks).

burden” and require that filings containing such material be submitted under seal.⁴⁰ If parties then seek to file such materials, the court may deny them leave to do so.⁴¹ District courts may also seek to counteract the effect of defamatory statements by explaining on the record that the statements appear to lack credibility. Moreover, under Federal Rule of Civil Procedure 12(f), the district court may strike such material from the filings on the grounds that it is “redundant, immaterial, impertinent, or scandalous.”⁴² Because such rejected or stricken material is not “relevant to the performance of the judicial function” it would not be considered a “judicial document” and would enjoy no presumption of public access.⁴³ Finally, in appropriate

⁴⁰ Fed. R. Civ. P. 26(c); *see also TheStreet.Com*, 273 F.3d at 229–30.

⁴¹ *See, e.g.,* S.D.N.Y. Electronic Case Filing Rules & Instructions, February 1, 2019 Edition, Rule 6.1, <http://nysd.uscourts.gov/ecf/ECF%20Rules%20020119%20Final.pdf>.

⁴² Fed. R. Civ. P. 12(f). Courts may strike material from the pleadings either “on its own” or “on motion made by a party.” *Id.* Although motions to strike material *solely* “on the ground that the matter is impertinent and immaterial” are disfavored, when material is also “scandalous,” no such presumption applies. *Cf. Lipsky v. Commonwealth United Corp.*, 551 F.2d 887, 893 (2d Cir. 1976); *see also Talbot v. Robert Matthews Distrib. Co.*, 961 F.2d 654, 664 (7th Cir. 1992) (“Allegations may be stricken as scandalous if the matter bears no possible relation to the controversy or may cause the objecting party prejudice.”); *Wine Markets Int’l, Inc. v. Bass*, 177 F.R.D. 128, 133 (E.D.N.Y. 1998) (“Motions to strike are not generally favored, except in relation to scandalous matters.”); *Alvarado-Morales v. Digital Equip. Corp.*, 843 F.2d 613, 617–18 (1st Cir. 1988) (categorizing as scandalous “matter which impugned the character of defendants”).

⁴³ *Amodeo I*, 44 F.3d at 145.

circumstances, district courts may impose sanctions on attorneys and parties under Federal Rule of Civil Procedure 11(c).⁴⁴

E. A Cautionary Note

We conclude with a note of caution to the public regarding the reliability of court filings such as those unsealed today.

Materials submitted by parties to a court should be understood for what they are. They do not reflect the court's own findings. Rather, they are prepared by parties seeking to advance their own interests in an adversarial process. Although affidavits and depositions are offered "under penalty of perjury," it is in fact exceedingly rare for anyone to be prosecuted for perjury in a civil proceeding.⁴⁵ Similarly,

⁴⁴ In relevant part, Rule 11 provides:

By presenting to the court a pleading, written motion, or other paper . . . an attorney or unrepresented party certifies that . . . it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation [T]he court may impose an appropriate sanction on any attorney, law firm, or party that violated the rule or is responsible for the violation The sanction may include nonmonetary directives; an order to pay a penalty into court; or, if imposed on motion and warranted for effective deterrence, an order directing payment to the movant of part or all of the reasonable attorney's fees and other expenses directly resulting from the violation.

Fed. R. Civ. P. 11. *See also Amodeo II*, 71 F.3d at 1049 (describing sanctions available to the court).

⁴⁵ Sonia Sotomayor & Nicole A. Gordon, *Returning Majesty to the Law and Politics: A Modern Approach*, 30 Suffolk U. L. Rev. 35, 47 n.52 (1996) ("Perjury cases are not often pursued . . .").

pleadings, complaints, and briefs—while supposedly based on underlying evidentiary material—can be misleading. Such documents sometimes draw dubious inferences from already questionable material or present ambiguous material as definitive.

Moreover, court filings are, in some respects, particularly susceptible to fraud. For while the threat of defamation actions may deter malicious falsehoods in standard publications, this threat is non-existent with respect to certain court filings. This is so because, under New York law (which governs the underlying defamation claim here), “absolute immunity from liability for defamation exists for oral or written statements made . . . in connection with a proceeding before a court.”⁴⁶ Thus, although the act of filing a document with a court might be thought to lend that document additional credibility, in fact, allegations appearing in such documents might be less credible than those published elsewhere.⁴⁷

⁴⁶ *Front, Inc. v. Khalil*, 24 N.Y.3d 713, 718 (2015); see also *Kelly v. Albarino*, 485 F.3d 664, 666 (2d Cir. 2007) (adopting the reasoning of the District Court explaining that this privilege is “the broadest of possible privileges”); Restatement (Second) of Torts § 587 (1977) (“A party to a private litigation or a private prosecutor or defendant in a criminal prosecution is absolutely privileged to publish defamatory matter concerning another in communications preliminary to a proposed judicial proceeding, or in the institution of or during the course and as a part of, a judicial proceeding in which he participates, if the matter has some relation to the proceeding.”). *But see* note 47, *post*.

⁴⁷ While common law courts have generally interpreted the litigation privilege broadly, they nevertheless maintain an important (if rarely implemented) limitation on its scope: to qualify for the privilege, a statement must be “material and pertinent to the questions involved.” *Front*, 24 N.Y.3d at 718 (quoting *Youmans*

We have long noted that the press plays a vital role in ensuring the public right of access and in enhancing “the quality and safeguards the integrity of the factfinding process.”⁴⁸ When faithfully observing its best traditions, the print and electronic media “contributes to public understanding of the rule of law” and “validates [its] claim of functioning as surrogates for the public.”⁴⁹

At the same time, the media does the public a profound disservice when it reports on parties’ allegations uncritically. We have previously observed that courts cannot possibly “discredit every statement or document turned up in the course of litigation,” and we have criticized “the use by the media of the somewhat misleading term ‘court records’ in referring to such items.”⁵⁰ Even ordinarily critical

v. Smith, 153 N.Y. 214, 219–20 (1897)). It follows, then, that immaterial and impertinent statements are (at least nominally) actionable, particularly when they are “so needlessly defamatory as to warrant the inference of express malice.” *Id.* (same). It seems to us that when a district court strikes statements from the record pursuant to Fed. R. Civ. P. 12(f) on the ground that the matter is “impertinent” and “immaterial,” it makes the very same determination that permits a defamation action under the common law. We think the judicial system would be well served were our common law courts to revitalize this crucial qualification to the litigation privilege.

⁴⁸ *Westmoreland v. Columbia Broad. Sys., Inc.*, 752 F.2d 16, 23 (2d Cir. 1984) (quoting *Globe Newspaper Co. v. Superior Court for Norfolk Cty.*, 457 U.S. 596, 606 (1982)).

⁴⁹ *Richmond Newspapers, Inc. v. Virginia*, 448 U.S. 555, 572–73 (1980) (plurality opinion) (internal quotation marks omitted).

⁵⁰ *Amodeo II*, 71 F.3d at 1049.

readers may take the reference to “court papers” as some sort of marker of reliability. This would be a mistake.

We therefore urge the media to exercise restraint in covering potentially defamatory allegations, and we caution the public to read such accounts with discernment.

III. CONCLUSION

To summarize, we hold as follows:

- (1) Materials submitted in connection with a motion for summary judgment are subject to a strong presumption of public access.
- (2) The summary judgment record at issue will be unsealed upon issuance of our mandate, subject to minimal redactions.⁵¹
- (3) Materials submitted in connection with, and relevant to, discovery motions, motions *in limine*, and other non-dispositive motions are subject to a lesser—but still substantial—presumption of public access.
- (4) The District Court is directed to review the remaining sealed materials individually and unseal those materials as appropriate.

⁵¹ See note 22, *ante*.

(5) District courts should exercise the full range of their substantial powers to ensure their files do not become vehicles for defamation.

For the foregoing reasons, we **VACATE** the orders of the District Court entered on November 2, 2016, May 3, 2017, and August 27, 2018, **ORDER** the unsealing of the summary judgment record as described herein, and **REMAND** the cause to the District Court for particularized review of the remaining materials.

In undertaking this task, the District Court may be well-served by ordering the parties to submit to the Court unredacted, electronic copies of the remaining sealed materials, as well as specific, proposed redactions. The District Court may also order the parties to identify and notify additional parties whose privacy interests would likely be implicated by disclosure of these materials.

In the interests of judicial economy, any future appeal in this matter shall be referred to this panel.

POOLER, *Circuit Judge, dissenting in part*:

I join the Court's opinion in every respect but one: the decision to unseal the summary judgment record ourselves. I agree that all or most of the material must be unsealed. Nevertheless, in my view, the district court is better suited to the task. As the Court's opinion recognizes in connection with the remaining sealed materials, the district court is better positioned to communicate with the parties and any nonparties whose privacy interests might be affected by unsealing. On that score, it is worth clarifying here the breadth of the Court's unsealing order: it unseals nearly 2000 pages of material. The task of identifying and making specific redactions in such a substantial volume is perilous; the consequences of even a seemingly minor error may be grave and are irrevocable. Moreover, although I share the majority's concern about avoiding delay, I would alleviate that concern through other means—perhaps with an order directing the district court to act expeditiously and by making clear what types of limited redactions are and are not appropriate. In sum, I would unseal the district court's summary judgment decision only and leave the remainder of the materials for the district court to review, redact, and unseal on remand.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**DEFENDANT'S STATEMENT OF MATERIAL UNDISPUTED
FACTS PURSUANT TO LOCAL CIVIL RULE 56.1**

Laura A. Menninger
Jeffrey S. Pagliuca
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Pursuant to Rule 56.1 of the Local Civil Rules of this Court, defendant Ghislaine Maxwell submits this statement of the material facts as to which she contends there is no genuine issues to be tried. Ms. Maxwell expressly preserves all of her objections to the admissibility of the evidence cited herein and in the accompanying memoranda of law and does not waive any objections by making this submission.

numbered.

1. **Ms. Maxwell's response to publications of plaintiff's false allegations: the March 2011 statement.** In early 2011 plaintiff in two British tabloid interviews made numerous false and defamatory allegations against Ms. Maxwell. In the articles, plaintiff made no direct allegations that Ms. Maxwell was involved in any improper conduct with Jeffrey Epstein, who had pleaded guilty in 2007 to procuring a minor for prostitution. Nonetheless, plaintiff suggested that Ms. Maxwell worked with Epstein and may have known about the crime for which he was convicted.

2. In the articles, plaintiff alleged she had sex with Prince Andrew, "a well-known businessman," a "world-renowned scientist," a "respected liberal politician," and a "foreign head of state."

3. In response to the allegations Ms. Maxwell's British attorney, working with Mr. Gow, issued a statement on March 9, 2011, denying "the various allegations about [Ms. Maxwell] that have appeared recently in the media. These allegations are all entirely false."

4. The statement read in full:

Statement on Behalf of Ghislaine Maxwell

By Devonshires Solicitors, PRNE
Wednesday, March 9, 2011

London, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her that have appeared recently in the media. *These allegations are all entirely false.*

It is unacceptable that letters sent by Ms Maxwell's legal representatives to certain newspapers pointing out the truth and asking for the allegations to be withdrawn have simply been ignored.

In the circumstances, *Ms Maxwell is now proceeding to take legal action against those newspapers.*

"I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get in the way of a good story." However, *the allegations made against me are abhorrent and entirely untrue* and I ask that they stop," said Ghislaine Maxwell.

"A number of newspapers have shown a complete lack of accuracy in their reporting of this story and a failure to carry out the most elementary investigation or any real due diligence. I am now taking action to clear my name," she said.

Media contact:

Ross Gow

Acuity Reputation

Tel: +44-203-008-7790

Mob: +44-7778-755-251

Email: ross@acuityreputation.com

Media contact: Ross Gow, Acuity Reputation, Tel: +44-203-008-7790, Mob: +44-7778-755-251, Email: ross at acuityreputation.com

5. Plaintiff's gratuitous and "lurid" accusations in an unrelated action. In 2008 two alleged victims of Epstein brought an action under the Crime Victims' Rights Act against the United States government purporting to challenge Epstein's plea agreement. They alleged the government violated their CVRA rights by entering into the agreement.

6. Seven years later, on December 30, 2014, Ms. Giuffre moved to join the CVRA action, claiming she, too, had her CVRA rights violated by the government. On January 1, 2015, Ms. Giuffre filed a "corrected" joinder motion.

7. The issue presented in her joinder motion was narrow: whether she should be permitted to join the CVRA action as a party under Federal Rule of Civil Procedure 21, specifically, whether she was a "known victim[]" of Mr. Epstein and the Government owed them CVRA duties." Yet, "the bulk of the [motion] consists of copious factual details that [plaintiff] and [her co-movant] 'would prove . . . if allowed to join.'" Ms. Giuffre gratuitously included

provocative and “lurid details” of her alleged sexual activities as an alleged victim of sexual trafficking.

8. At the time they filed the motion, Ms. Giuffre and her lawyers knew that the media had been following the Epstein criminal case and the CVRA action. While they deliberately filed the motion without disclosing Ms. Giuffre’s name, claiming the need for privacy and secrecy, they made no attempt to file the motion under seal. Quite the contrary, they filed the motion publicly.

9. As the district court noted in ruling on the joinder motion, Ms. Giuffre “name[d] several individuals, and she offers details about the type of sex acts performed and where they took place.” The court ruled that “these lurid details are unnecessary”: “The factual details regarding whom and where the Jane Does engaged in sexual activities are immaterial and impertinent . . . , especially considering that these details involve *non-parties* who are not related to the respondent Government.” Accordingly, “[t]hese unnecessary details shall be stricken.” *Id.* The court then struck all Ms. Giuffre’s factual allegations relating to her alleged sexual activities and her allegations of misconduct by non-parties. The court said the striking of the “lurid details” was a sanction for Ms. Giuffre’s improper inclusion of them in the motion.

10. The district court found not only that the “lurid details” were unnecessary but also that the entire joinder motion was “entirely unnecessary.” Ms. Giuffre and her lawyers knew the motion with all its “lurid details” was unnecessary because the motion itself recognized that she would be able to participate as a fact witness to achieve the same result she sought as a party. The court denied plaintiff’s joinder motion.

11. One of the non-parties Ms. Giuffre “named” repeatedly in the joinder motion was Ms. Maxwell. According to the “lurid details” of Ms. Giuffre included in the motion,

Ms. Maxwell personally was involved in a “sexual abuse and sex trafficking scheme” created by Epstein:

- Ms. Maxwell “approached” plaintiff in 1999 when plaintiff was “fifteen years old” to recruit her into the scheme.
- Ms. Maxwell was “one of the main women” Epstein used to “procure under-aged girls for sexual activities.”
- Ms. Maxwell was a “primary co-conspirator” with Epstein in his scheme.
- She “persuaded” plaintiff to go to Epstein’s mansion “in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children.”
- At the mansion, when plaintiff began giving Epstein a massage, he and Ms. Maxwell “turned it into a sexual encounter.”
- Epstein “with the assistance of” Ms. Maxwell “converted [plaintiff] into . . . a ‘sex slave.’” *Id.* Plaintiff was a “sex slave” from “about 1999 through 2002.”
- Ms. Maxwell also was a “co-conspirator in Epstein’s sexual abuse.”
- Ms. Maxwell “appreciated the immunity” she acquired under Epstein’s plea agreement, because the immunity protected her from prosecution “for the crimes she committed in Florida.”
- Ms. Maxwell “participat[ed] in the sexual abuse of [plaintiff] and others.”
- Ms. Maxwell “took numerous sexually explicit pictures of underage girls involved in sexual activities, including [plaintiff].” *Id.* She shared the photos with Epstein.
- As part of her “role in Epstein’s sexual abuse ring,” Ms. Maxwell “connect[ed]” Epstein with “powerful individuals” so that Epstein could traffick plaintiff to these persons.
- Plaintiff was “forced to have sexual relations” with Prince Andrew in “[Ms. Maxwell’s] apartment” in London. Ms. Maxwell “facilitated” plaintiff’s sex with Prince Andrew “by acting as a ‘madame’ for Epstein.”
- Ms. Maxwell “assist[ed] in internationally trafficking” plaintiff and “numerous other young girls for sexual purposes.”
- Plaintiff was “forced” to watch Epstein, Ms. Maxwell and others “engage in illegal sexual acts with dozens of underage girls.”

12. In the joinder motion, plaintiff also alleged she was “forced” to have sex with Harvard law professor Alan Dershowitz, “model scout” Jean Luc Brunel, and “many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders.”

13. Plaintiff said after serving for four years as a “sex slave,” she “managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years.”

14. Plaintiff suggested the government was part of Epstein’s “conspiracy” when it “secretly” negotiated a non-prosecution agreement with Eptstein precluding federal prosecution of Epstein and his “co-conspirators.” The government’s secrecy, plaintiff alleged, was motivated by its fear that plaintiff would raise “powerful objections” to the agreement that would have “shed tremendous public light on Epstein and other powerful individuals.

15. Notably, the other “Jane Doe” who joined plaintiff’s motion who alleged she was sexually abused “many occasions” by Epstein was unable to corroborate any of plaintiff’s allegations.

16. Also notably, in her multiple and lengthy consensual interviews with Ms. Churcher three years earlier, plaintiff told Ms. Churcher of virtually *none* of the details she described in the joinder motion.

17. **Ms. Maxwell’s response to plaintiff’s “lurid” accusations: the January 2015 statement.** As plaintiff and her lawyers expected, before District Judge Marra in the CVRA action could strike the “lurid details” of plaintiff’s allegations in the joinder motion, members of the media obtained copies of the motion.

18. At Mr. Barden’s direction, on January 3, 2015, Mr. Gow sent to numerous representatives of British media organizations an email containing “a quotable statement on

behalf of Ms Maxwell.” The email was sent to more than 6 and probably less than 30 media representatives. It was not sent to non-media representatives.

19. Among the media representatives were Martin Robinson of the Daily Mail; P. Peachey of The Independent; Nick Sommerlad of The Mirror; David Brown of The Times; and Nick Always and Jo-Anne Pugh of the BBC; and David Mercer of the Press Association. These representatives were selected based on their request—after the joinder motion was filed—for a response from Ms. Maxwell to plaintiff’s allegations in the motion.

20. The email to the media members read:

To Whom It May Concern,
Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.
Thanks for your understanding.

Best
Ross

Ross Gow
ACUITY Reputation

Jane Doe 3 is Virginia Roberts—so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts [sic] that Alan Derschowitz [sic] is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell’s original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

21. Mr. Barden, who prepared the January 2015 statement, did not intend it as a traditional press release solely to disseminate information to the media. So he intentionally did not pass it through a public relations firm, such as Mr. Gow’s firm, Acuity Reputation.

22. The January 2015 statement served two purposes. First, Mr. Barden intended that it mitigate the harm to Ms. Maxwell's reputation from the press's republication of plaintiff's false allegations. He believed these ends could be accomplished by suggesting to the media that, among other things, they should subject plaintiff's allegations to inquiry and scrutiny. For example, he noted in the statement that plaintiff's allegations changed dramatically over time, suggesting that they are "obvious lies" and therefore should not be "publicised as news."

23. Second, Mr. Barden intended the January 2015 statement to be "a shot across the bow" of the media, which he believed had been unduly eager to publish plaintiff's allegations without conducting any inquiry of their own. Accordingly, in the statement he repeatedly noted that plaintiff's allegations were "defamatory." In this sense, the statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of plaintiff's obviously false allegations and the legal indefensibility of their own conduct.

24. Consistent with those two purposes, Mr. Gow's emails prefaced the statement with the following language: "Please find attached a *quotable statement* on behalf of Ms Maxwell" (emphasis supplied). The statement was intended to be a single, one-time-only, comprehensive response—quoted in full—to plaintiff's December 30, 2014, allegations that would give the media Ms. Maxwell's response. The purpose of the prefatory statement was to inform the media-recipients of this intent.

25. Plaintiff's activities to bring light to the rights of victims of sexual abuse.

Plaintiff has engaged in numerous activities to bring attention to herself, to the prosecution and punishment of wealthy individuals such as Epstein, and to her claimed interest of bringing light to the rights of victims of sexual abuse.

26. Plaintiff created an organization, Victims Refuse Silence, Inc., a Florida corporation, directly related to her alleged experience as a victim of sexual abuse.

27. The “goal” of Victims Refuse Silence “was, and continues to be, to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse.” Toward this end, plaintiff has “dedicated her professional life to helping victims of sex trafficking.”

28. Plaintiff repeatedly has sought out media organizations to discuss her alleged experience as a victim of sexual abuse.

29. On December 30, 2014, plaintiff publicly filed an “entirely unnecessary” joinder motion laden with “unnecessary,” “lurid details” about being “sexually abused” as a “minor victim[]” by wealthy and famous men and being “trafficked” all around the world as a “sex slave.”

30. The plaintiff’s alleged purpose in filing the joinder motion was to “vindicate” her rights under the CVRA, expose the government’s “secretly negotiated” “non-prosecution agreement” with Epstein, “*shed tremendous public light*” on Epstein and “other powerful individuals” that would undermine the agreement, and support the CVRA plaintiffs’ request for documents that would show how Epstein “used his powerful political and social connections to secure a favorable plea deal” and the government’s “motive” to aid Epstein and his “co-conspirators.”

31. Plaintiff has written the manuscript of a book she has been trying to publish detailing her alleged experience as a victim of sexual abuse and of sex trafficking in Epstein’s alleged “sex scheme.”

32. **Republication alleged by plaintiff.** Plaintiff was required by Interrogatory No. 6 to identify any false statements attributed to Ms. Maxwell that were “published globally, including within the Southern District of New York,” as plaintiff alleged in Paragraph 9 of Count I of her complaint. In response, plaintiff identified the January 2015 statement and nine instances in which various news media published portions of the January 2015 statement in news articles or broadcast stories.

33. In none of the nine instances was there any publication of the entire January 2015 statement.

34. Ms. Maxwell and her agents exercised no control or authority over any media organization, including the media identified in plaintiff’s response to Interrogatory No. 6, in connection with the media’s publication of portions of the January 2015 statement.

35. **Plaintiff’s defamation action against Ms. Maxwell.** Eight years after Epstein’s guilty plea, plaintiff brought this action, repeating many of the allegations she made in her CVRA joinder motion.

36. The complaint alleged that the January 2015 statement “contained the following deliberate falsehoods”:

- (a) That Giuffre’s sworn allegations “against Ghislaine Maxwell are untrue.”
- (b) That the allegations have been “shown to be untrue.”
- (c) That Giuffre’s “claims are obvious lies.”

37. **Plaintiff lived independently from her parents with her fiancé long before meeting Epstein or Ms. Maxwell.** After leaving the Growing Together drug rehabilitation facility in 1999, plaintiff moved in with the family of a fellow patient. There she met, and became engaged to, her friend’s brother, James Michael Austrich. She and Austrich thereafter

rented an apartment in the Ft. Lauderdale area with another friend and both worked at various jobs in that area. Later, they stayed briefly with plaintiff's parents in the Palm Beach/Loxahatchee, Florida area before Austrich rented an apartment for the couple on Bent Oak Drive in Royal Palm Beach. Although plaintiff agreed to marry Austrich, she never had any intention of doing so.

38. Plaintiff re-enrolled in high school from June 21, 2000 until March 7, 2002.

After finishing the 9th grade school year at Forest Hills High School on June 9, 1999, plaintiff re-enrolled at Wellington Adult High School on June 21, 2000, again on August 16, 2000 and on August 14, 2001. On September 20, 2001, Plaintiff then enrolled at Royal Palm Beach High School. A few weeks later, on October 12, 2001, she matriculated at Survivors Charter School. *Id.* Survivor's Charter School was an alternative school designed to assist students who had been unsuccessful at more traditional schools. Plaintiff remained enrolled at Survivor's Charter School until March 7, 2002. She was present 56 days and absent 13 days during her time there. *Id.* Plaintiff never received her high school diploma or GED. Plaintiff and Figueroa went "back to school" together at Survivor's Charter School. The school day there lasted from morning until early afternoon.

39. During the year 2000, plaintiff worked at numerous jobs. In 2000, while living with her fiancé, plaintiff held five different jobs: at Aviculture Breeding and Research Center, Southeast Employee Management Company, The Club at Mar-a-Lago, Oasis Outsourcing, and Neiman Marcus. Her taxable earnings that year totaled nearly \$9,000. Plaintiff cannot now recall either the Southeast Employee Management Company or the Oasis Outsourcing jobs.

40. Plaintiff's employment at the Mar-a-Lago spa began in fall 2000. Plaintiff's father, Sky Roberts, was hired as a maintenance worker at the The Mar-a-Lago Club in Palm

Beach, Florida, beginning on April 11, 2000. Mr. Roberts worked there year-round for approximately 3 years. After working there for a period of time, Mr. Roberts became acquainted with the head of the spa area and recommended plaintiff for a job there. Mar-a-Lago closes every Mother's Day and reopens on November 1. Most of employees Mar-a-Lago, including all employees of the spa area such as "spa attendants," are "seasonal" and work only when the club is open, i.e., between November 1 and Mother's Day. Plaintiff was hired as a "seasonal" spa attendant to work at the Mar-a-Lago Club in the fall of 2000 after she had turned 17.

41. **Plaintiff represented herself as a masseuse for Jeffrey Epstein.** While working at the Mar-a-Lago spa and reading a library book about massage, plaintiff met Ms. Maxwell. Plaintiff thereafter told her father that she got a job working for Jeffrey Epstein as a masseuse. Plaintiff's father took her to Epstein's house on one occasion around that time, and Epstein came outside and introduced himself to Mr. Roberts. Plaintiff commenced employment as a traveling masseuse for Mr. Epstein. Plaintiff was excited about her job as a masseuse, about traveling with him and about meeting famous people. Plaintiff represented that she was employed as a masseuse beginning in January 2001. Plaintiff never mentioned Ms. Maxwell to her then-fiancé, Austrich. Plaintiff's father never met Ms. Maxwell.

42. **Plaintiff resumed her relationship with convicted felon Anthony Figueroa.** In spring 2001, while living with Austich, plaintiff lied to and cheated on him with her high school boyfriend, Anthony Figueroa. Plaintiff and Austrich thereafter broke up, and Figueroa moved into the Bent Oak apartment with plaintiff. When Austrich returned to the Bent Oak apartment to check on his pets and retrieve his belongings, Figueroa in Plaintiff's presence punched Austrich in the face. Figueroa and plaintiff fled the scene before police arrived. Figueroa was then a convicted felon and a drug abuser on probation for possession of a controlled substance.

43. **Plaintiff freely and voluntarily contacted the police to come to her aid in 2001 and 2002 but never reported to them that she was Epstein's "sex slave."** In August 2001 at age 17, while living in the same apartment, plaintiff and Figueroa hosted a party with a number of guests. During the party, according to plaintiff, someone entered plaintiff's room and stole \$500 from her shirt pocket. Plaintiff contacted the police. She met and spoke with police officers regarding the incident and filed a report. She did not disclose to the officer that she was a "sex slave." A second time, in June 2002, plaintiff contacted the police to report that her former landlord had left her belongings by the roadside and had lit her mattress on fire. Again, plaintiff met and spoke with the law enforcement officers but did not complain that she was the victim of any sexual trafficking or abuse or that she was then being held as a "sex slave."

44. **From August 2001 until September 2002, Epstein and Maxwell were almost entirely absent from Florida on documented travel unaccompanied by Plaintiff.** Flight logs maintained by Epstein's private pilot Dave Rodgers evidence the substantial number of trips away from Florida that Epstein and Maxwell took, unaccompanied by Plaintiff, between August 2001 and September 2002. Rodgers maintained a log of all flights on which Epstein and Maxwell traveled with him. Epstein additionally traveled with another pilot who did not keep such logs and he also occasionally traveled via commercial flights. For substantially all of thirteen months of the twenty-two months (from November 2000 until September 2002) that Plaintiff lived in Palm Beach and knew Epstein, Epstein was traveling outside of Florida unaccompanied by Plaintiff. During this same period of time, Plaintiff was employed at various jobs, enrolled in school, and living with her boyfriend.

45. **Plaintiff and Figueroa shared a vehicle during 2001 and 2002.** Plaintiff and Figueroa shared a '93 white Pontiac in 2001 and 2002. Plaintiff freely traveled around the Palm

Beach area in that vehicle. In August 2002, Plaintiff acquired a Dodge Dakota pickup truck from her father. Figueroa used that vehicle in a series of crimes before and after Plaintiff left for Thailand.

46. **Plaintiff held a number of jobs in 2001 and 2002.** During 2001 and 2002, plaintiff was gainfully employed at several jobs. She worked as a waitress at Mannino's Restaurant, at TGIFriday's restaurant (aka CCI of Royal Palm Inc.), and at Roadhouse Grill. She also was employed at Courtyard Animal Hospital (aka Marc Pinkwasser DVM).

47. **In September 2002, Plaintiff traveled to Thailand to receive massage training and while there, met her future husband and eloped with him.** Plaintiff traveled to Thailand in September 2002 to receive formal training as a masseuse. Figueroa drove her to the airport. While there, she initially contacted Figueroa frequently, incurring a phone bill of \$4,000. She met Robert Giuffre while in Thailand and decided to marry him. She thereafter ceased all contact with Figueroa from October 2002 until two days before Mr. Figueroa's deposition in this matter in May 2016.

48. **Detective Recarey's investigation of Epstein failed to uncover any evidence that Ms. Maxwell was involved in sexual abuse of minors, sexual trafficking or production or possession of child pornography.** Joseph Recarey served as the lead detective from the Palm Beach Police Department charged with investigating Jeffrey Epstein. That investigation commenced in 2005. Recarey worked only on the Epstein case for an entire year. He reviewed previous officers' reports and interviews, conducted numerous interviews of witnesses and alleged victims himself, reviewed surveillance footage of the Epstein home, participated in and had knowledge of the search warrant executed on the Epstein home, and testified regarding the case before the Florida state grand jury against Epstein. Detective Recarey's investigation

revealed that not one of the alleged Epstein victims ever mentioned Ms. Maxwell's name and she was never considered a suspect by the government. None of Epstein's alleged victims said they had seen Ms. Maxwell at Epstein's house, nor said they had been "recruited by her," nor paid any money by her, nor told what to wear or how to act by her. Indeed, none of Epstein's alleged victims ever reported to the government they had met or spoken to Ms. Maxwell. Maxwell was not seen coming or going from the house during the law enforcement surveillance of Epstein's home. The arrest warrant did not mention Ms. Maxwell and her name was never mentioned before the grand jury. No property belonging to Maxwell, including "sex toys" or "child pornography," was seized from Epstein's home during execution of the search warrant. Detective Recarey, when asked to describe "everything that you believe you know about Ghislaine Maxwell's sexual trafficking conduct," replied, "I don't." He confirmed he has no knowledge about Ms. Maxwell sexually trafficking anybody. Detective Recarey also has no knowledge of Plaintiff's conduct that is subject of this lawsuit.

49. **No nude photograph of Plaintiff was displayed in Epstein's home.** Epstein's housekeeper, Juan Alessi, "never saw any photographs of Virginia Roberts in Mr. Epstein's house." Detective Recarey entered Epstein's home in 2002 to install security cameras to catch a thief and did not observe any "child pornography" within the home, including on Epstein's desk in his office.

50. **Plaintiff intentionally destroyed her "journal" and "dream journal" regarding her "memories" of this case in 2013 while represented by counsel.** Plaintiff drafted a "journal" describing individuals to whom she claims she was sexually trafficked as well as her memories and thoughts about her experiences with Epstein. In 2013, she and her husband created a bonfire in her backyard in Florida and burned the journal together with other documents in her

possession. *Id.* Plaintiff also kept a “dream journal” regarding her thoughts and memories that she possessed in January 2016. To date, Plaintiff cannot locate the “dream journal.”

51. Plaintiff publicly peddled her story beginning in 2011. Plaintiff granted journalist Sharon Churcher extensive interviews that resulted in seven (7) widely distributed articles from March 2011 through January 2015. Churcher regularly communicated with plaintiff and her “attorneys or other agents” from “early 2011” to “the present day.” Plaintiff received approximately \$160,000 for her stories and pictures that were published by many news organizations.

52. Plaintiff drafted a 144-page purportedly autobiographical book manuscript in 2011 which she actively sought to publish. In 2011, contemporaneous with her Churcher interviews, plaintiff drafted a book manuscript which purported to document plaintiff’s experiences as a teenager in Florida, including her interactions with Epstein and Maxwell. Plaintiff communicated with literary agents, ghost writers and potential independent publishers in an effort to get her book published. She generated marketing materials and circulated those along with book chapters to numerous individuals associated with publishing and the media.

53. Plaintiff’s publicly filed “lurid” CVRA pleadings initiated a media frenzy and generated highly publicized litigation between her lawyers and Alan Dershowitz. On December 30, 2014, plaintiff, through counsel, publicly filed a joinder motion that contained her “lurid allegations” about Ms. Maxwell and many others, including Alan Dershowitz, Prince Andrew, Jean-Luc Brunel. The joinder motion was followed by a “corrected” motion and two further declarations in January and February 2015, which repeated many of plaintiff’s claims. These CVRA pleadings generated a media maelstrom and spawned highly publicized litigation between plaintiff’s lawyers, Edwards and Cassell, and Alan Dershowitz. After plaintiff publicly

alleged Mr. Dershowitz of sexual misconduct, Mr. Dershowitz vigorously defended himself in the media. He called plaintiff a liar and accused her lawyers of unethical conduct. In response, attorneys Edwards and Cassell sued Dershowitz who counterclaimed. This litigation, in turn, caused additional media attention by national and international media organizations.

54. Plaintiff formed non-profit Victims Refuse Silence to attract publicity and speak out on a public controversy. In 2014, plaintiff, with the assistance of the same counsel, formed a non-profit organization, Victims Refuse Silence. According to plaintiff, the purpose of the organization is to promote plaintiff's professed cause against sex slavery. The stated goal of her organization is to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse. Plaintiff attempts to promote Victims Refuse Silence at every opportunity. For example, plaintiff participated in an interview in New York with ABC to promote the charity and to get her mission out to the public.

Dated: January 6, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on January 6, 2017, I electronically served this *Defendant's Statement of Material Undisputed Facts Pursuant to Local Civil Rule 56.1* via ECF on the following:

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Memorandum of Law in Support of Defendant's
Motion for Summary Judgment**

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Defendant Ghislaine Maxwell moves under Federal Rule of Civil Procedure 56 for summary judgment.

PRELIMINARY STATEMENT

FACTS

The following facts are undisputed. Additional undisputed facts are set forth in specific argument sections. All paragraphs containing undisputed facts will be sequentially numbered.

1. **Ms. Maxwell's response to publications of plaintiff's false allegations: the March 2011 statement.** In early 2011 plaintiff in two British tabloid interviews made numerous false and defamatory allegations against Ms. Maxwell. EXHIBITS A-B.¹ In the articles, plaintiff made no direct allegations that Ms. Maxwell was involved in any improper conduct with Jeffrey Epstein, who had pleaded guilty in 2007 to procuring a minor for prostitution.² Nonetheless, plaintiff suggested that Ms. Maxwell worked with Epstein and may have known about the crime for which he was convicted. *See generally* EXHIBITS A-B.

2. In the articles, plaintiff alleged she had sex with Prince Andrew, “a well-known businessman,” a “world-renowned scientist,” a “respected liberal politician,” and a “foreign head of state.” *Id.* at 5.

3. In response to the allegations Ms. Maxwell's British attorney, working with Mr. Gow, issued a statement on March 9, 2011, denying “the various allegations about [Ms. Maxwell] that have appeared recently in the media. These allegations are all entirely false.” EXHIBIT C.

4. The statement read in full:

¹The articles were attached as exhibits to the author Sharon Churcher's declaration in support of her motion to quash an SDT issued to her. *See* Doc.216-2 & 216-3.

²Doc.1 ¶¶ 11, 14.

Statement on Behalf of Ghislaine Maxwell

By Devonshires Solicitors, PRNE

Wednesday, March 9, 2011

London, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her that have appeared recently in the media. *These allegations are all entirely false.*

It is unacceptable that letters sent by Ms Maxwell's legal representatives to certain newspapers pointing out the truth and asking for the allegations to be withdrawn have simply been ignored.

In the circumstances, *Ms Maxwell is now proceeding to take legal action against those newspapers.*

"I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get in the way of a good story." However, *the allegations made against me are abhorrent and entirely untrue* and I ask that they stop," said Ghislaine Maxwell.

"A number of newspapers have shown a complete lack of accuracy in their reporting of this story and a failure to carry out the most elementary investigation or any real due diligence. I am now taking action to clear my name," she said.

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EXHIBIT C (emphasis supplied; capitalization altered). We refer to this as "the March 2011 statement."

5. **Plaintiff's gratuitous and "lurid" accusations in an unrelated action.** In 2008 two alleged victims of Epstein brought an action under the Crime Victims' Rights Act against the United States government purporting to challenge Epstein's plea agreement. They alleged the government violated their CVRA rights by entering into the agreement. *See* EXHIBIT D, at 2.

6. Seven years later, on December 30, 2014, Ms. Giuffre moved to join the CVRA action, claiming she, too, had her CVRA rights violated by the government. On January 1, 2015, Ms. Giuffre filed a “corrected” joinder motion. EXHIBIT D, at 1, 9.

7. The issue presented in her joinder motion was narrow: whether she should be permitted to join the CVRA action as a party under Federal Rule of Civil Procedure 21, specifically, whether she was a “known victim[] of Mr. Epstein and the Government owed them CVRA duties,” EXHIBIT E, at 5. Yet, the court noted, “the bulk of the [motion] consists of copious factual details that [plaintiff] and [her co-movant] ‘would prove . . . if allowed to join.’” *Id.* (brackets omitted). Ms. Giuffre gratuitously included provocative and “lurid details” of her alleged sexual activities as an alleged victim of sexual trafficking. *Id.*

8. At the time they filed the motion, Ms. Giuffre and her lawyers knew that the media had been following the Epstein criminal case and the CVRA action. While they deliberately filed the motion without disclosing Ms. Giuffre’s name, claiming the need for privacy and secrecy, they made no attempt to file the motion under seal. Quite the contrary, they filed the motion publicly. EXHIBIT D, at 1 & n.1.

9. As the district court noted in ruling on the joinder motion, Ms. Giuffre “name[d] several individuals, and she offers details about the type of sex acts performed and where they took place.” EXHIBIT E, at 5. The court ruled that “these lurid details are unnecessary”: “The factual details regarding whom and where the Jane Does engaged in sexual activities are immaterial and impertinent . . . , especially considering that these details involve *non-parties* who are not related to the respondent Government.” *Id.* Accordingly, “[t]hese unnecessary details shall be stricken.” *Id.* The court then struck all Ms. Giuffre’s factual allegations relating to her alleged sexual activities and her allegations of misconduct by non-parties. *Id.* at 5-6. The court

said the striking of the “lurid details” was a sanction for Ms. Giuffre’s improper inclusion of them in the motion. *See id.* at 6-7.

10. The district court found not only that the “lurid details” were unnecessary but also that the entire joinder motion was “entirely unnecessary,” *id.* at 7. Ms. Giuffre and her lawyers knew the motion with all its “lurid details” was unnecessary because, as the court pointed out, the motion itself recognized that she would be able to participate as a fact witness to achieve the same result she sought as a party. *See id.* at 7-8; *see also id.* at 8 (noting that in the motion, Ms. Giuffre’s lawyers said that “regardless of whether this Court grants the . . . Motion, ‘they will call [her] as a witness at any trial’”). The court denied plaintiff’s joinder motion. *Id.* at 10.

11. One of the non-parties Ms. Giuffre “named” repeatedly in the joinder motion was Ms. Maxwell. EXHIBIT D, at 3-6. According to the “lurid details” of Ms. Giuffre included in the motion, Ms. Maxwell personally was involved in a “sexual abuse and sex trafficking scheme” created by Epstein:

- Ms. Maxwell “approached” plaintiff in 1999 when plaintiff was “fifteen years old” to recruit her into the scheme. *Id.* at 3.
- Ms. Maxwell was “one of the main women” Epstein used to “procure under-aged girls for sexual activities.” *Id.*
- Ms. Maxwell was a “primary co-conspirator” with Epstein in his scheme. *Id.*
- She “persuaded” plaintiff to go to Epstein’s mansion “in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children.” *Id.*
- At the mansion, when plaintiff began giving Epstein a massage, he and Ms. Maxwell “turned it into a sexual encounter.” *Id.*
- Epstein “with the assistance of” Ms. Maxwell “converted [plaintiff] into . . . a ‘sex slave.’” *Id.* Plaintiff was a “sex slave” from “about 1999 through 2002.” *Id.*
- Ms. Maxwell also was a “co-conspirator in Epstein’s sexual abuse.” *Id.* at 4.

- Ms. Maxwell “appreciated the immunity” she acquired under Epstein’s plea agreement, because the immunity protected her from prosecution “for the crimes she committed in Florida.” *Id.*
- Ms. Maxwell “participat[ed] in the sexual abuse of [plaintiff] and others.” *Id.*
- Ms. Maxwell “took numerous sexually explicit pictures of underage girls involved in sexual activities, including [plaintiff].” *Id.* She shared the photos with Epstein. *Id.*
- As part of her “role in Epstein’s sexual abuse ring,” Ms. Maxwell “connect[ed]” Epstein with “powerful individuals” so that Epstein could traffick plaintiff to these persons. *Id.*
- Plaintiff was “forced to have sexual relations” with Prince Andrew in “[Ms. Maxwell’s] apartment” in London. *Id.* Ms. Maxwell “facilitated” plaintiff’s sex with Prince Andrew “by acting as a ‘madame’ for Epstein.” *Id.*
- Ms. Maxwell “assist[ed] in internationally trafficking” plaintiff and “numerous other young girls for sexual purposes.” *Id.*
- Plaintiff was “forced” to watch Epstein, Ms. Maxwell and others “engage in illegal sexual acts with dozens of underage girls.” *Id.*

12. In the joinder motion, plaintiff also alleged she was “forced” to have sex with Harvard law professor Alan Dershowitz, “model scout” Jean Luc Brunel, and “many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders.” *Id.* at 4-6.

13. Plaintiff said after serving for four years as a “sex slave,” she “managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years.” *Id.* at 3.

14. Plaintiff suggested the government was part of Epstein’s “conspiracy” when it “secretly” negotiated a non-prosecution agreement with Epstein precluding federal prosecution of Epstein and his “co-conspirators.” *Id.* at 6. The government’s secrecy, plaintiff alleged, was motivated by its fear that plaintiff would raise “powerful objections” to the agreement that would have “shed tremendous public light on Epstein and other powerful individuals. *Id.* at 6-7.

15. Notably, the other “Jane Doe” who joined plaintiff’s motion who alleged she was sexually abused “many occasions” by Epstein was unable to corroborate any of plaintiff’s allegations. *See id.* at 7-8.

16. Also notably, in her multiple and lengthy consensual interviews with Ms. Churcher three years earlier, plaintiff told Ms. Churcher virtually *none* of the details she described in the joinder motion. *See* EXHIBIT A-B.

17. **Ms. Maxwell’s response to plaintiff’s “lurid” accusations: the January 2015 statement.** As plaintiff and her lawyers expected, before District Judge Marra in the CVRA action could strike the “lurid details” of plaintiff’s allegations in the joinder motion, members of the media obtained copies of the motion. *See* EXHIBIT G, at 31:2-36:4 & Depo.Exs.3-4.

18. At Mr. Barden’s direction, on January 2, 2015, Mr. Gow sent to numerous representatives of British media organizations an email containing “a quotable statement on behalf of Ms Maxwell.” EXHIBIT F; EXHIBIT G, at 33:8-23. The email was sent to more than 6 and probably less than 30 media representatives. *See* EXHIBIT G, at 33:8-34:3. It was not sent to non-media representatives. *See id.* at 31:2-35:21.

19. Among the media representatives were Martin Robinson of the Daily Mail; P. Peachey of The Independent; Nick Sommerlad of The Mirror; David Brown of The Times; and Nick Always and Jo-Anne Pugh of the BBC; and David Mercer of the Press Association. *See, e.g.,* EXHIBIT F. These representatives were selected based on their request—after the joinder motion was filed—for a response from Ms. Maxwell to plaintiff’s allegations in the motion. *See, e.g.,* EXHIBIT G, at 30:23-35:21 & Depo.Ex.3.

20. The email to the media members read:

To Whom It May Concern,
Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.

Thanks for your understanding.

Best

Ross

Ross Gow

ACUITY Reputation

Jane Doe 3 is Virginia Roberts—so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts [sic] that Alan Dershowitz [sic] is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

EXHIBIT F (emphasis supplied). We refer to this email as “the January 2015 statement.”

21. Mr. Barden, who prepared the January 2015 statement, did not intend it as a traditional press release solely to disseminate information to the media. So he intentionally did engage a public relations firm, such as Mr. Gow's firm Acuity Reputation, to prepare the statement. *See* EXHIBIT K ¶¶ 10,15.

22. The January 2015 statement served two purposes. First, Mr. Barden intended that it mitigate the harm to Ms. Maxwell's reputation from the press's republication of plaintiff's false allegations. He believed this could be accomplished by suggesting to the media that, among other things, they should subject plaintiff's allegations to inquiry and scrutiny. For example, he noted in the statement that plaintiff's allegations changed dramatically over time, suggesting that they are “obvious lies” and therefore should not be “publicised as news.” *Id.* ¶ 11.

23. Second, Mr. Barden intended the January 2015 statement to be “a shot across the bow” of the media, which he believed had been unduly eager to publish plaintiff’s allegations without conducting any inquiry of their own. Accordingly, in the statement he repeatedly noted that plaintiff’s allegations were “defamatory.” In this sense, the statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of plaintiff’s obviously false allegations and the legal indefensibility of their own conduct. *Id.* ¶ 17.

24. Consistent with those two purposes, Mr. Gow’s emails prefaced the statement with the following language: “Please find attached a *quotable statement* on behalf of Ms Maxwell” (emphasis supplied). The statement was intended to be a single, one-time-only, comprehensive response—quoted in full—to plaintiff’s December 30, 2014, allegations that would give the media Ms. Maxwell’s response. *Id.* ¶ 19. The purpose of the prefatory statement was to inform the media-recipients of this intent. *Id.*

25. **Plaintiff’s activities to bring light to the rights of victims of sexual abuse.** Plaintiff has engaged in numerous activities to bring attention to herself, to the prosecution and punishment of wealthy individuals such as Epstein, and to her claimed interest of bringing light to the rights of victims of sexual abuse.

26. Plaintiff created an organization, Victims Refuse Silence, Inc., a Florida corporation, directly related to her alleged experience as a victim of sexual abuse. Doc.1 ¶¶ 24-25.

27. The “goal” of Victims Refuse Silence “was, and continues to be, to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse.” *Id.* ¶ 25. Toward this end, plaintiff has “dedicated her professional life to helping victims of sex trafficking.” *Id.*

28. Plaintiff repeatedly has sought out media organizations to discuss her alleged experience as a victim of sexual abuse. *See* This Motion at ¶¶ 51-54.

29. As discussed above, on December 30, 2014, plaintiff publicly filed an “entirely unnecessary”³ joinder motion laden with what Judge Marra described as “unnecessary,”⁴ “lurid details”⁵ about being “sexually abused” as a “minor victim[]” by wealthy and famous men and being “trafficked” all around the world as a “sex slave.” EXHIBIT D, at 1 n.1, 3-6.

30. The plaintiff’s alleged purpose in filing the joinder motion was to “vindicate” her rights under the CVRA, expose the government’s “secretly negotiated” “non-prosecution agreement” with Epstein, “*shed tremendous public light*” on Epstein and “other powerful individuals” that would undermine the agreement, and support the CVRA plaintiffs’ request for documents that would show how Epstein “used his powerful political and social connections to secure a favorable plea deal” and the government’s “motive” to aid Epstein and his “co-conspirators.” *See* EXHIBIT D, at 1, 6-7, 10 (emphasis supplied).

31. Plaintiff has written the manuscript of a book she has been trying to publish detailing her alleged experience as a victim of sexual abuse and of sex trafficking in Epstein’s alleged “sex scheme.” EXHIBIT KK.

32. **Republication alleged by plaintiff.** Plaintiff⁶ was required by Interrogatory No. 6 to identify any false statements attributed to Ms. Maxwell that were “published globally, including

³EXHIBIT E, at 7.

⁴*Id.* at 5.

⁵*Id.*

⁶The undisputed facts relevant to this Motion are contained in the Facts section, above, and within each argument as appropriate. The undisputed facts will be sequentially numbered throughout this Motion.

within the Southern District of New York,” as plaintiff alleged in Paragraph 9 of Count I of her complaint. In response, plaintiff identified the January 2015 statement and nine instances in which various news media published portions of the January 2015 statement in news articles or broadcast stories. EXHIBIT H, at 7-8; EXHIBIT I, at 4.

33. In none of the nine instances was there any publication of the entire January 2015 statement. *See* EXHIBIT H, at 7-8; EXHIBIT I, at 4.

34. Ms. Maxwell and her agents exercised no control or authority over any media organization, including the media identified in plaintiff’s response to Interrogatory No. 6, in connection with the media’s publication of portions of the January 2015 statement. EXHIBIT J ¶ 24; EXHIBIT K ¶¶ 2-3..

35. **Plaintiff’s defamation action against Ms. Maxwell.** Eight years after Epstein’s guilty plea, plaintiff brought this action, repeating many of the allegations she made in her CVRA joinder motion. *See* Doc.1 ¶ 9.

36. The complaint alleged that the January 2015 statement “contained the following deliberate falsehoods”:

- (a) That Giuffre’s sworn allegations “against Ghislaine Maxwell are untrue.”
- (b) That the allegations have been “shown to be untrue.”
- (c) That Giuffre’s “claims are obvious lies.”

Doc.1 ¶ 30 (boldface and underscoring omitted).

SUMMARY JUDGMENT STANDARD

“[C]ourts should not be reluctant to grant summary judgment in appropriate cases. ‘One of the principal purposes of the summary judgment rule is to isolate and dispose of factually insupportable claims,’ thereby permitting courts to avoid ‘protracted, expensive and harassing trials.’” *Don King Prods., Inc. v. Douglas*, 742 F. Supp. 778, 780 (S.D.N.Y. 1990) (quoting

Celotex Corp. v. Catrett, 477 U.S. 317, 323-24 (1986), and *Meiri v. Dacon*, 759 F.2d 989, 998 (2d Cir. 1985)). Where summary judgment is sought under Article I, Section 8, of the New York Constitution, the New York Court of Appeals has declared, “we reaffirm our regard for the particular value of summary judgment, where appropriate, in libel cases,” *Immuno AG v. Moor-Jankowski*, 567 N.E.2d 1270, 1282 (N.Y. 1991), particularly when as here a defendant is challenging a defamation claim under the “independent State law approach” articulated in *Immuno AG* that might make summary disposition more likely than under a federal approach, *see id.*

Summary judgment is appropriate where “there is no genuine issue as to any material fact and . . . the moving party is entitled to a judgment as a matter of law.” Fed. R. Civ. P. 56(c). The relevant inquiry on application for summary judgment is “whether the evidence presents a sufficient disagreement to require submission to a jury or whether it is so one-sided that one party must prevail as a matter of law.” *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 251-52 (1986).

“[T]he mere existence of *some* alleged factual dispute between the parties will not defeat an otherwise properly supported motion for summary judgment; the requirement is that there be no *genuine* issue of *material* fact.” *Id.* at 247-48. The substantive law determines what facts are material. *Id.* at 248. “Only disputes over facts that might affect the outcome of the suit under the governing law will properly preclude the entry of summary judgment. Factual disputes that are irrelevant or unnecessary will not be counted.” *Id.* A dispute about a material fact is “genuine” if the evidence is such that a reasonable jury could return a verdict for the nonmoving party.” *Id.*

In the face of a properly supported summary judgment motion, the plaintiff may not “rest on [the] allegations” in her complaint. *Id.* at 249. The trial court’s function is to determine

whether there is a genuine issue for trial, and “there is no issue for trial unless there is sufficient evidence favoring the nonmoving party for a jury to return a verdict for that party.” *Id.*

“[T]he plain language of Rule 56(c) mandates the entry of summary judgment . . . against a party who fails to make a showing sufficient to establish the existence of an element essential to that party’s case, and on which that party will bear the burden of proof at trial.” *Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986). In such a situation, “there can be ‘no genuine issue as to any material fact,’ since a complete failure of proof concerning an essential element of the nonmoving party’s case necessarily renders all other facts immaterial. The moving party is ‘entitled to a judgment as a matter of law’ because the nonmoving party has failed to make a sufficient showing on an essential element of her case with respect to which she has the burden of proof.” *Id.* at 323; *see* Fed. R. Civ. P. 56 advisory committee’s notes (2010 amendments) (restoration of “*shall* grant summary judgment” was intended to “express the direction to grant summary judgment, and “avoids the unintended consequences of any other word”).

ARGUMENT

I. Ms. Maxwell is not liable for republications of her January 2015 statement that she did not authorize or request and by entities she did not control.

A. Summary judgment is warranted to the extent plaintiff seeks to impose liability on any media’s republication of all or a portion of the January 2015 statement.

Messrs. Barden and Gow, acting on behalf of Ms. Maxwell, caused the January 2015 statement to be transmitted—published—to various individuals employed by media organizations. The question presented in this Argument I is whether Ms. Maxwell is liable for any republication of all or a portion of the January 2015 statement by the media. Under New York law, the answer is no.

Liability for a republication “must be based on *real authority to influence the final product.*” *Davis v. Costa-Gavras*, 580 F. Supp. 1082, 1096 (S.D.N.Y. 1984) (emphasis supplied).

“[W]here a defendant ‘had no actual part in composing or publishing,’ he cannot be held liable ‘without disregarding the settled rule of law that no man is bound for the tortious act of another over whom he has not a master’s power of control.’” *Id.* (quoting *Folwell v. Miller*, 145 F. 495, 497 (2d Cir. 1906)); see *Geraci v. Probst*, 938 N.E.2d 917, 921 (N.Y. 2010) (holding that defendant was not liable for republication, in part because “there is no indication that Probst had any control over whether or not Newsday published the article”). “Conclusive evidence of lack of actual authority [is] sufficiently dispositive that the [trial court] ‘ha[s] no option but to dismiss the case’” *Id.* (quoting *Rinaldi v. Viking Penguin, Inc.*, 420 N.E.2d 377, 382 (N.Y. 1981)).

As the New York Court of Appeals held in *Geraci*:

It is too well settled to be now questioned that one who . . . prints and publishes a libel[] is not responsible for its voluntary and unjustifiable repetition, without his authority or request, by others over whom he has no control and who thereby make themselves liable to the person injured, and that such repetition cannot be considered in law a necessary, natural and probable consequence of the original slander or libel.

938 N.E.2d at 921 (internal quotations and citation omitted). The rationale behind this rule is that “each person who repeats the defamatory statement is responsible for the resulting damages.” *Id.* (internal quotations omitted).

With the goal of garnering maximum publicity and defaming Ms. Maxwell, Ms. Giuffre filed an “entirely unnecessary”⁷ joinder motion with “lurid details” about sexual acts for the purpose of attracting the attention of the public, which was “‘curious, titillated or intrigued’”⁸ about alleged sexual acts and relationships among the rich and famous. In defense of Ms. Maxwell’s reputation, Messrs. Barden and Gow responded with the January 2015 statement.

⁷EXHIBIT E, at 7.

⁸*Time, Inc. v. Firestone*, 424 U.S. 448, 488 n.1 (1976) (Marshall, J., dissenting) (quoting *Firestone v. Time, Inc.*, 271 So. 2d 745, 752 (Fla. 1972)).

The email transmitting the statement explained it was “a *quotable statement* on behalf of Ms Maxwell” and “[n]o further communication will be provided by her on this matter.”

EXHIBIT F (emphasis supplied). The media representatives were notified that if they intended to use the statement, it was to be quoted in its entirety. *See* This Motion ¶ 24, at 8. Ms. Maxwell and Messrs. Barden and Gow had no ability to control whether or how the media-recipients would use the statement, and they made no effort to control whether or how they would use the statement. EXHIBIT K ¶¶ 2-3; EXHIBIT J ¶ 24.

Ms. Maxwell is not responsible for any republication of the January 2015 statement, whether it was republished in whole or in part,⁹ since she had no authority or control over any media that published any portion of it. In the words of this Court, she had no “real authority to influence the final product,” *Davis*, 580 F. Supp. at 1096.

The media’s *selective, partial* republication of the statement is more problematic yet. An original publisher of a statement cannot be charged with a republisher’s “editing and excerpting of her statement.” *Rand v. New York Times Co.*, 430 N.Y.S.2d 271, 275 (App. Div. 1980). The rule applies with even greater force where as here a defamation claim is grounded on the expression of opinion: An individual “cannot be liable for the republication of a derogatory but constitutionally protected opinion when the foundation upon which that opinion is based is omitted. The defamatory remark should be ‘read against the background of its issuance.’” *Id.* (quoting *Mencher v. Chesley*, 75 N.E.2d 257, 259 (N.Y. 1947), and citing *James v. Gannett Co.*, 353 N.E.2d 834, 838 (N.Y. 1976)).

⁹Plaintiff has not disclosed under Fed. R. Civ. P. 26(a)(1)(A)(ii) any republication of the entirety of the January 2015 statement. In response to our discovery requests requiring her to identify republications of all or a portion of the statement, plaintiff identified no republication of the entirety of the statement.

The rationale for this rule is found in the New York Court of Appeals' explanation of how an original publisher's allegedly defamatory statement should be interpreted:

The statement complained of will be read against the background of its issuance with respect to the circumstances of its publication. It is the duty of the court, in an action for libel, to understand the publication in the same manner that others would naturally do. *The construction which it behooves a court of justice to put on a publication which is alleged to be libelous is to be derived as well from the expressions used as from the whole scope and apparent object of the writer.*

James, 353 N.E.2d at 838 (emphasis supplied; citations and internal quotations omitted).

The January 2015 statement was intended to be read *by the media-recipients* in its entirety. **One**, it was intended to be a comprehensive, one-time-only response to all of plaintiff's lurid and false allegations of sexual and other misconduct by Ms. Maxwell. *See* EXHIBIT J ¶ 13. **Two**, the statement was complex in that it could not be quoted partially and out of context and still convey the intended meaning. Among other things, the statement was intended to show *why* plaintiff could not be believed—why her allegations are “obvious lies”—by pointing out how her story changed each time she retold the story. As Mr. Barden explains:

Selective and partial quotation and use of the statement would dissuade my purposes. It was intended to address Plaintiff's behavior and allegations against Ms. Maxwell on a broad scale, that is to say, Plaintiff's history of making false allegations and innuendo to the media against Ms. Maxwell. This is why the statement references Plaintiff's “original allegations” and points out that her story “changes”—i.e. is embellished—over time including the allegations “now” that Professor Dershowitz allegedly had sexual relations with her. This is why I distinguished in the statement between Plaintiff's “original” allegations and her “new,” joinder-motion allegations, which differed substantially from the original allegations. And this is why I wrote, “Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders and now it is alleged by [Plaintiff] that Alan Dershowitz [sic] is involved in having sexual relations with her, which he denies.” (Emphasis supplied.) Having established the dramatic difference between Plaintiff's two sets of allegations, which suggested she was fabricating more and more-salacious allegations as she had more time to manufacture them, I added the third paragraph: “[Ms. Giuffre's] claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.” (Emphasis supplied.) I believed then, and believe now, that it was and remains a fair inference and conclusion that her claims were and are “obvious

lies.” As noted, her claims not to have slept with Prince Andrew and to have slept with Prince Andrew are a classic example of an obvious lie. One or other account is on the face of it a lie.

EXHIBIT J ¶ 20. That Mr. Barden on behalf of Ms. Maxwell was expressing his *opinion*—in the form of a legal argument—as a lawyer would be lost if words and phrases are extracted from and used outside the context of the January 2015 statement. Yet, this is precisely what the media did in their articles on the statement and what plaintiff did in her complaint (*see* Doc.1 ¶ 30).

Finally, the statement was intended to be a “shot across the bow” of the media-recipients so that they understood the seriousness with which Ms. Maxwell considered the publication of plaintiff’s obviously false allegations and the legal indefensibility of their own conduct. *See id.*

¶ 17. Selectively excerpting from the statement would seriously undermine this purpose by changing the force of the message to the media-recipients.

Under these circumstances, selective, partial and out-of-context republication of Mr. Barden’s deliberate and carefully crafted message to the media-representatives, as a matter of law, cannot result in defamation liability for Ms. Maxwell. Accordingly, the Court should enter partial summary judgment.

B. Because plaintiff is a limited public figure, imposing liability upon Ms. Maxwell for republication of the January 2015 statement would violate the First Amendment.

As this Court recognized in *Davis, New York Times v. Sullivan*¹⁰ and its progeny “preclude states from imposing liability without fault in actions for defamation, especially by public figures.” 580 F. Supp. at 1097 (citing, *inter alia*, *Gertz v. Robert Welch, Inc.*, 418 U.S. 323 (1974)). This principle precludes the imposition of liability for republication of an allegedly

¹⁰376 U.S. 254 (1964).

defamatory statement on a party who had no “actual . . . responsibility for the decision to republish” the statement. *Id.*

A public figure includes a person who “voluntarily injects himself or is drawn into a particular public controversy and thereby becomes a public figure for a limited range of issues.” *Gertz*, 418 U.S. at 351; *see, e.g., James*, 353 N.E.2d at 839 (public figure includes those who have “thrust themselves to the forefront of particular public controversies in order to influence the resolution of the issues involved”). The evidence that plaintiff is a public figure is overwhelming, particularly in connection with the subject matters and issues addressed by and underlying the January 2015 statement. *See This Motion* ¶¶ 51-54.

In the case at bar, Ms. Maxwell and her agents had no responsibility for any media organization’s decision to republish the January 2015 statement, and they did not participate in any such decision. *See EXHIBITS J* ¶ 24 & *K* ¶¶ 2-3. Liability for republication by media organizations of the January 2015 statement therefore is precluded under the First Amendment.

C. Plaintiff should be barred from introducing into evidence any republication of an excerpt from the January 2015 statement.

In *Geraci*, the plaintiff suggested in a letter to the Long Island fire district where defendant was a commissioner that defendant had engaged in self-dealing in the district’s purchase of fire trucks. At trial the plaintiff sought to introduce into evidence portions of a Newsday article that republished parts of the defendant’s letter. Defense counsel objected, arguing it was inflammatory and prejudicial. Plaintiff’s counsel later argued the article “was not being offered as a republication, but on the issue of damages to show how far the allegations had circulated.” 938 N.E.2d at 920. Additionally, plaintiff’s counsel argued that the defendant “should have reasonably anticipated” that his letter to the fire district “would be newsworthy.” *Id.* The trial court admitted the article, and the Appellate Division affirmed.

The New York Court of Appeals reversed. The risk of admitting such evidence, the court held, is the jury may “charge against defendant a separate, distinct libel (not pleaded in [the] complaint) by someone else, contrary to the rule that [t]he original publisher of a libel is not responsible for its subsequent publication by others.” *Geraci*, 938 N.E.2d at 921. Accordingly, the court held, “[A]bsent a showing that [defendant] *approved or participated in some other manner in the activities of the third-party republisher*[,]’ there is no basis for allowing the jury to consider the article containing the republished statement as a measure of plaintiff’s damages attributable to defendants.” *Id.* (emphasis supplied; quoting *Karaduman v. Newsday, Inc.*, 416 N.E.2d 557, 560 (1980)).

Neither Ms. Maxwell nor her agents approved or participated in any activity of any media organization in its decision to publish or not to publish any part of the January 2015 statement. EXHIBIT J ¶ 2; K ¶¶ 2-3.. Accordingly, “there is no basis for allowing the jury to consider [any] article containing the republished statement as a measure of plaintiff’s damages attributable to [Ms. Maxwell],” *id.* Plaintiff should be barred from introducing any evidence of any republication of the January 2015 statement by any non-party. *See, e.g., Soley v. Wasserman*, No. 8 CIV. 9262 KMW FM, 2013 WL 3185555, at *8 (S.D.N.Y. June 21, 2013) (precluding plaintiff from adducing evidence intended to establish claim on which court had entered partial summary judgment).

II. Summary judgment is warranted under the New York Constitution.

A. The January 2015 statement constitutes nonactionable opinion.

“Whether particular words are defamatory presents a legal question to be resolved by the court in the first instance.” *Germain v. M & T Bank Corp.*, 111 F. Supp. 3d 506, 534 (S.D.N.Y. 2015) (brackets omitted; quoting *Celle v. Filipino Reporter Enters. Inc.*, 209 F.3d 163,

177 (2d Cir. 2000)); *accord, e.g., Aronson v. Wiersma*, 483 N.E.2d 1138, 1139 (N.Y. 1985). New York defamation law applies. Doc.37 at 6 n.2.

“It is a settled rule that expressions of an opinion false or not, libelous or not, are constitutionally protected and may not be the subject of private damage actions.” *Steinhilber v. Alphonse*, 501 N.E.2d 550, 550 (N.Y. 1986) (internal quotations omitted). Whether a challenged statement is fact or opinion is a question of law to be decided by the Court. *Enigma Software Grp. USA, LLC v. Bleeping Computer LLC*, No. 16 CIV. 57 (PAE), 2016 WL 3773394, at *11 (S.D.N.Y. July 8, 2016); *accord, e.g., Steinhilber*, 501 N.E.2d at 553.

In *Immuno AG v. Moor-Jankowski*,¹¹ the New York Court of Appeals declared that the New York Constitution provides greater protection to opinion than the First Amendment of the United States Constitution. The court recognized that in *Milkovich v. Lorain Journal Co.*, 497 U.S. 1 (1990), the United States Supreme Court reversed a state court decision dismissing a complaint on the ground that the allegedly defamatory statement was nonactionable opinion. The Supreme Court held there is no “wholesale defamation exemption” protecting opinion. The First Amendment analysis under *Milkovich*, the New York court observed, was one-dimensional: the trial court should look first to the allegedly defamatory statement’s specific words as commonly understood and then determine whether the statements were “verifiable”; if the statements were verifiable, then they were actionable statements of fact. *See Immuno AG*, 567 N.E.2d at 1274-75. The Supreme Court’s holding made it clear that it would not consider as part of the First Amendment analysis “the full context of the article in which the challenged statements appear, and the broader social context or setting surrounding the communication.” *Id.* at 1274.

¹¹567 N.E.2d 1270 (N.Y. 1991).

The *Immuno AG* Court of Appeals held that Article I, Section 8, of the New York Constitution required a multidimensional approach to the determination whether an allegedly defamatory statement constitutes constitutionally protected opinion. The court gave numerous reasons. New York’s “expansive” constitutional guarantee of speech was formulated and adopted before the application of the First Amendment to the states; “[i]t has long been our standard in defamation actions” to consider factors beyond whether facts are “verifiable”; and the court was concerned that if “‘type of speech’ is to be construed narrowly[,] . . . insufficient protection may be accorded to central values protected by the law of this State.” *Id.* at 1277-78. The *Immuno AG* court reaffirmed that where a defendant alleges that the subject statement is opinion, *Steinhilber* supplies the analytical framework. *Id.* at 1280.

Steinhilber held that whether an allegedly defamatory statement is fact or nonactionable opinion should be decided based on four factors: (1) an assessment of whether the specific language in issue has a precise meaning which is readily understood or whether it is indefinite and ambiguous; (2) a determination of whether the statement is capable of being objectively characterized as true or false; (3) an examination of the full context of the communication in which the statement appears; and (4) a consideration of the broader social context or setting surrounding the communication including the existence of any applicable customs or conventions which might signal to readers or listeners that what is being read or heard is likely to be opinion, not fact. 501 N.E.2d at 554.

Application of these factors to the January 2015 statement compels the conclusion that the allegedly defamatory words, phrases and clauses are nonactionable opinion.

Whether the specific language in issue has a precise meaning which is readily understood or whether it is indefinite and ambiguous. The three sentences plaintiff alleges are

defamatory are indefinite and ambiguous. The first says plaintiff's "allegations" against Ms. Maxwell are "untrue." But plaintiff has made many dozens of allegations against Ms. Maxwell, and some are provably false. *See* This Motion, at ¶¶ 37-50. The statement does not specify *which* of the allegations are untrue. The second statement is that the "original allegations" have been "shown to be untrue." The "original allegations" were first revealed in the 2011 Churcher articles. Plaintiff made many dozens of allegations "originally." The statement does not specify *which* of the "original" allegations were shown to be untrue. Some *have* been shown to be untrue. *See* This Motion, at 53-65. The third statement is that plaintiff's "claims" are "obvious lies." This too is indefinite and ambiguous. Plaintiff has made many dozens of claims. The statement does not specify which ones are being referenced. More importantly, it does not say how or why some of the claims are "obvious" lies. Regardless, some of plaintiff's claims are "obvious lies." *See* This Motion, at 53-65.

Whether the three sentences in the January 2015 statement are capable of being objectively characterized as true or false. Can the three sentences be characterized as true or false? They cannot, because the statement does not specify which of the many dozens of allegations plaintiff has made are "untrue" and "shown to be untrue," and which of plaintiff's many dozens of "claims" are "obvious lies."

It is axiomatic that the plural form of a word, e.g., "allegations" and "claims," universally denotes—only—"more than one," *People v. Kocsis*, 28 N.Y.S.3d 466, 471 (App. Div. 2016) (emphasis supplied). *See, e.g., Lehman Bros. Commercial Corp. v. Minmetals Int'l Non-Ferrous Metals Trading Co.*, No. 94 CIV. 8301(JFK), 1995 WL 380119, at *6 n.2 (S.D.N.Y. June 26, 1995). So for *Steinhilber* purposes it is dispositive of the fact versus opinion question if we can

identify *two* instances in which plaintiff's allegations or claims¹² are incapable of being proved true or false. Such examples abound. It cannot be proven true or false whether Ms. Maxwell "appreciated the immunity granted"¹³ under the Epstein plea agreement or whether she "act[ed] as a 'madame' for Epstein."¹⁴ That is because these are plaintiff's counsel's arguments or opinions. The January 2015 statement asserts that these allegations/claims are "false" or "obvious lies." That assertion cannot be proven true or false under *Steinhilber*.

The full context of the communication in which the statement appears. This factor "is often the key consideration in categorizing a statement as fact or opinion." *Davis v. Boenheim*, 22 N.E.3d 999, 1006 (N.Y. 2014) (internal quotations omitted).

In deciding whether a statement is defamatory, "[t]he words must be construed in the context of the entire statement or publication as a whole, tested against the understanding of the average reader." *Aronson v. Wiersma*, 483 N.E.2d 1138, 1139 (1985); accord *Elias v. Rolling Stone LLC*, No. 15-CV-5953 (PKC), 2016 WL 3583080, at *6 (S.D.N.Y. June 28, 2016). "It is the duty of the court, in an action for libel, to understand the publication in the same manner that others would naturally do. The construction which it behooves a court of justice to put on a publication which is alleged to be libelous is to be derived as well from the expressions used as

¹²In the context of the January 2015 statement, an "allegation" is synonymous with a "claim." See, e.g., *Maule v. Philadelphia Media Holdings, LLC*, No. CIV.A. 08-3357, 2010 WL 914926, at *10 (E.D. Pa. Mar. 15, 2010); see generally Black's Law Dictionary 68 (5th ed. 1979) (defining "allegation" as "[t]he assertion, *claim*, declaration, or statement of a party to an action, made in a pleading, setting out what he expects to prove"), quoted with approval in *Martin v. City of Oceanside*, 205 F. Supp. 2d 1142, 1147 (S.D. Cal. 2002), *aff'd*, 360 F.3d 1078 (9th Cir. 2004).

¹³EXHIBIT D, at 4.

¹⁴*Id.*

from the whole scope and apparent object of the writer.” *James v. Gannett Co.*, 353 N.E.2d 834, 838 (N.Y. 1976); *accord, e.g., Chau v. Lewis*, 935 F. Supp. 2d 644, 665 (S.D.N.Y. 2013).

In general the trial court should view allegedly defamatory statements from the perspective of the average member of the public. Statements directed to a specific audience, however, are considered from the viewpoint of that audience. Instructive is this Court’s analysis of the perspective from which it should assess an allegedly defamatory article on boxing published to sports readers:

The issue of how the “average reader” would construe the statements is certainly a fair one, for the question of whether statements are defamatory turns on *how the audience to whom the statements are addressed* would interpret them. . . . As the New York State Court of Appeals has explained in [a] boxing-defamation case[]: “The words are to be construed not with the close precision expected from lawyers and judges but as they would be read and understood by the public to which they are addressed. . . .”

Here, the statements in question were addressed to readers of an Internet boxing website and the sports pages of daily newspapers. The statements must be considered from their viewpoint. As Judge Martin . . . held [in *Horne v. Matthews*, No. 97 Civ. 3605(JSM), 1997 WL 598452 (S.D.N.Y. Sept. 25, 1997)]: “An article on the sports page of a newspaper should be viewed *from the perspective of the audience to whom it is addressed, i.e., the understanding of “a sophisticated and sports-conscious reader.”*”

Dibella v. Hopkins, No. 01 CIV. 11779 (DC), 2002 WL 31427362, at *2 (S.D.N.Y. Oct. 30, 2002) (emphasis supplied; citation omitted).

The entirety of the email containing the January 2015 statement from Mr. Gow sent to various media representatives reads:

To Whom It May Concern,
Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.
Thanks for your understanding.
Best
Ross

Ross Gow
ACUITY Reputation

Jane Doe 3 is Virginia Roberts—so not a new individual. The allegations made by Victoria Roberts [sic] against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders and *now* it is alleged by Ms Roberts [sic] that Alan Dershowitz [sic] is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

EXHIBIT F (*italics and underscoring supplied*).

Plaintiff listed the underscored clauses/phrases in the Complaint as the “deliberate falsehoods,” Doc.1 ¶ 30, and “false and defamatory statements,” *id.* ¶ 32, plaintiff is suing on.¹⁵

As discussed above, it is improper to remove from their context and isolate allegedly defamatory words, phrases and clauses of sentences from an allegedly defamatory publication. Instead, the allegedly defamatory words, phrases and clauses must be (a) “construed in the context of the entire statement or publication as a whole”;¹⁶ (b) considered “from the whole scope and apparent object of the writer”;¹⁷ and (c) “viewed from the perspective of the audience to whom it is addressed.”¹⁸

The statement was directed at a discrete number of—some 30—members of the media in reply to their request for a response from Ms. Maxwell to Ms. Giuffre's CVRA joinder motion.

¹⁵Plaintiff also alleges that Ms. Maxwell slandered her on January 4, 2015, when responding to a question posed to her while she was on a Manhattan street. Doc.1 ¶ 37. This allegedly defamatory statement is addressed in Argument IV, below.

¹⁶*Aronson*, 483 N.E.2d at 1139.

¹⁷*James*, 353 N.E.2d at 838.

¹⁸*Dibella*, 2002 WL 31427362, at *2.

Mr. Barden, who prepared the January 2015 statement, did not intend the January 2015 statement to be a traditional press release solely to disseminate information to the media. EXHIBIT K ¶ 15. So he did not request that Mr. Gow or any other public relations specialist prepare the statement. *Id.* Instead, Mr. Gow served only as Mr. Barden’s conduit to the media representatives who had requested a response to the joinder motion allegations and who Mr. Barden believed might republish those allegations. *Id.*

Mr. Barden intended the statement to mitigate the harm to Ms. Maxwell’s reputation from the press’s republication of plaintiff’s false allegations. *Id.* ¶ 16. He believed this could be accomplished by suggesting to the media that, among other things, they should subject plaintiff’s allegations to inquiry and scrutiny. *Id.* For example, he noted that plaintiff’s allegations changed dramatically over time, suggesting that they are “obvious lies” and therefore should not be “publicised as news.” *Id.*

Mr. Barden also intended the January 2015 statement to be “a shot across the bow” of the media, which he believed had been unduly eager to publish plaintiff’s allegations without conducting any inquiry of their own. *Id.* ¶ 17. So Mr. Barden stated repeatedly that plaintiff’s allegations were “defamatory.” *Id.* In this sense, the statement was very much intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of plaintiff’s obviously false allegations and the legal indefensibility of their own conduct. *Id.*

Consistent with Mr. Barden’s purposes for the statement, Mr. Gow’s emails prefaced the statement with the following language: “Please find attached a *quotable statement* on behalf of Ms Maxwell” (emphasis supplied). *Id.* ¶ 19. The statement was intended to be a single, one-time-only, comprehensive response—quoted in full—to plaintiff’s December 30, 2014,

allegations that would give the media Ms. Maxwell's response. *Id.* The purpose of the prefatory statement was to inform the media-recipients of this intent. *Id.*

We note that plaintiff in her Complaint makes the same mistake as the *Steinhilber* plaintiff—extracting words and phrases from their opinion context so that she can claim the assertion of a “defamatory” fact. *See* Doc.1 ¶ 30. That is not permissible. *See Steinhilber*, 501 N.E.2d at 555 (“The sentence which plaintiff selects from the message and claims is “factually laden”—impugning her as lacking in “talent, ambition, and initiative”⁵—is preceded and followed by statements which are clearly part of the attempt at humor prevailing throughout . . .”).

The broader social context or setting surrounding the communication, including the existence of any applicable customs or conventions which might signal to readers that what is being read is likely to be opinion, not fact. This factor is concerned with “the factual background” leading up to the preparation of the statement. It is a critical factor here. In December 2014, plaintiff and her lawyers had timed for maximum effect—during the slow news cycle between Christmas and New Year's Day—the public filing of a superfluous motion filled with salacious and provocative allegations of “sexual abuse” and “sexual trafficking” involving wealthy and prominent Americans. Plaintiff deliberately placed Ms. Maxwell in the middle of the abuse and trafficking, alleging that she recruited plaintiff into the sexual abuse/trafficking scheme and engaged in numerous criminal acts.

Importantly, three years earlier when plaintiff was interviewed extensively by Churcher for two lengthy articles published in March 2011, plaintiff's allegations concerning Ms. Maxwell were very much different. In the articles discussing plaintiff's “shocking account”¹⁹ of being

¹⁹EXHIBIT A, at 2.

sexually exploited by Epstein, Prince Andrew and Epstein’s “male peers,”²⁰ plaintiff made virtually *none* of what Judge Marra found were “unnecessary”²¹ and “lurid details”²² about how Ms. Maxwell allegedly had subjected her to sexual abuse and trafficking.

After plaintiff filed the CVRA motion, some thirty reporters contacted Ms. Maxwell’s press representative, Mr. Gow, for Ms. Maxwell’s response. As Ms. Maxwell’s lawyer, Mr. Barden undertook that task. Relying on his knowledge of the 2011 articles publishing plaintiff’s allegations and drawing on his experience and training as a lawyer, Mr. Barden crafted a response with the goal of discrediting plaintiff and what the statement called plaintiff’s “new” allegations. To that end Mr. Barden contrasted plaintiff’s “old” allegations from 2011 with the “new” 2014 allegations. The second paragraph of the statement is indicative of this strategy: “*Each time the story is re told [sic] it changes with new salacious details* about public figures and world leaders and *now* it is alleged by [Ms. Giuffre] that Alan Dershowitz [sic] is involved in having sexual relations with her, which he denies.” EXHIBIT F (emphasis supplied). Having established the dramatic difference between these sets of allegations suggesting plaintiff was fabricating more and more-salacious allegations as she had more time to manufacture them, Mr. Barden added the third paragraph: “[Ms. Giuffre’s] claims are *obvious lies* and should be treated as such and not publicised as news, as they are defamatory.” *Id.* (emphasis supplied).

Mr. Barden’s arguments constitute “pure opinion,” *Steinhilber*, 501 N.E.2d at 552. They take established and revealed facts—plaintiff’s modest 2011 allegations to a newspaper reporter and plaintiff’s expansive, unnecessary and lurid 2014 allegations in a motion to open the door to

²⁰ *Id.*

²¹ EXHIBIT E, at 5.

²² *Id.*

criminal prosecutions of (and civil lawsuits against) wealthy and prominent men around the world—to draw an obvious inference that plaintiff was (more) truthful in the 2011 articles and engaged in massive manufacturing of fiction in the 2014 joinder motion. There is no limit to the subject matters on which pure opinions may be expressed with constitutional immunity, including whether a person believes another is “lying” or is a “liar.” *See, e.g., Indep. Living Aids, Inc. v. Maxi-Aids, Inc.*, 981 F. Supp. 124, 128 (E.D.N.Y. 1997) (granting summary judgment: “Read in the context of the entire article, Zaretsky’s remarks, calling Sandler and others ‘liars,’ can only be understood as a denial of their accusations. . . . Even the most careless reader must have perceived that the words were no more than rhetorical hyperbole, a vigorous epithet used by Zaretsky who considered himself unfairly treated and sought to bring what he alleged were the true facts to the readers. The epithet ‘liar’ in this context, standing by itself, merely expressed the opinion that anyone who persisted in accusing Zaretsky of improper business practices could not be telling the truth. Since the basis for this opinion was fully set forth, the communication of Zaretsky’s views cannot be libelous.”) (citations, ellipsis, brackets and internal quotations omitted); *see Gross v. New York Times*, 623 N.E.2d 1163, 1169 (N.Y. 1993) (“[E]ven when uttered or published in a . . . serious tone, accusations of criminality could be regarded as mere hypothesis and therefore not actionable if the facts on which they are based are fully and accurately set forth and it is clear to the reasonable reader . . . that the accusation is merely a personal surmise built upon those facts. In all cases, whether the challenged remark concerns criminality or some other defamatory category, the courts are obliged to consider the communication as a whole, as well as its immediate and broader social contexts, to determine whether the reasonable listener . . . is likely to understand the remark as an assertion of provable fact.”).

Mr. Barden's inference from disclosed facts qualifies as "pure opinion," *Steinhilber*, 501 N.E.2d at 552. Accordingly, that Mr. Barden characterized plaintiff's 2014 allegations harshly as "obvious lies" as opposed to "untruths" or some softer term is of no moment. "[U]nder New York law, pure opinion . . . is not actionable because expressions of opinion, as opposed to assertions of fact, are deemed privileged and, no matter how offensive, cannot be the subject of an action for defamation." *Ratajack v. Brewster Fire Dep't, Inc. of the Brewster-SE Joint Fire Dist.*, 178 F. Supp. 3d 118, 158 (S.D.N.Y. 2016) (internal quotations and ellipsis omitted; brackets altered); *accord, e.g., Mann v. Abel*, 885 N.E.2d 884, 885-86 (N.Y. 2008).

The drawing of such inferences would be constitutionally protected even under the standards of the First Amendment that are less protective of opinion than is Article I, Section 8, of the New York Constitution. *See Adelson v. Harris*, 973 F. Supp. 2d 467, 490 (S.D.N.Y. 2013) ("In determining whether a statement constitutes constitutionally protected opinion, courts also look to the specific context of the statement. When looking at a statement's specific context, of particular importance is the principle that when an author outlines the facts available to him, thus making it clear that the challenged statements represent his own interpretation of those facts and leaving the reader free to draw his own conclusions, those statements are generally protected by the First Amendment.") (internal quotations and brackets omitted).

The application of the four *Steinhilber* factors confirms that the three phrases and/or clauses plaintiff alleges are defamatory are in fact part of a statement that taken as a whole constitutes nonactionable opinion. The premise of plaintiff's Complaint is that once she is able to identify references in the January 2015 statement to any assertion of fact that potentially is subject to proof, e.g., the truth or falsity of her many dozens of allegations old and new, then she has a viable defamation claim. That ignores the teaching of *Steinhilber* and *Immuno AG*. As the

Steinhilber court held, “even apparent statements of fact may assume the character of statements of opinion, and thus be privileged, when made in public debate, heated labor dispute, or other circumstances in which an audience may anticipate the use of epithets, fiery rhetoric or hyperbole.” *Id.* (internal quotations and brackets omitted); *see Gross*, 623 N.E.2d at 1169 (“we stress once again our commitment to avoiding the ‘hypertechnical parsing’ of written and spoken words for the purpose of identifying ‘possible “fact[s]” that might form the basis of sustainable libel action”) (quoting *Immuno AG*, 567 N.E.2d at 1282).

To the same effect is this Court’s citation to a Louisiana Supreme Court decision for the proposition that “[w]ords which, taken by themselves, would appear to be a positive allegation of fact, *may be shown by the context to be a mere expression of opinion or argumentative influence.*” *Adelson*, 973 F. Supp. 2d at 488 (emphasis supplied; quoting *Mashburn v. Collin*, 355 So. 2d 879, 885 (La. 1977)).

It also is important to take into account, as *Steinhilber* requires, that Mr. Barden was directing the January 2015 statement to a discrete number of media representatives who were aware of plaintiff’s “original” and “new,” joinder-motion allegations and who were requesting a response from Ms. Maxwell to the “new” allegations. These newspaper reporters and other media representatives would have the point Mr. Barden was making—the opinion he was expressing—namely, that there was good reason to believe plaintiff was fabricating allegations for her purposes. In the context of the media circus that ensued the public filing of the joinder motion and the media’s repeated and insistent requests for an immediate response from Ms. Maxwell, it is highly unlikely any media-recipients of the January 2015 statement expected anything other than a statement equivalent to the March 2011 statement condemning the allegations; and it is highly likely all the media-recipients understood the statement to be a

forceful argument that plaintiff's shifting and inconsistent stories about what allegedly happened rendered her inherently unbelievable and proved her increasingly provocative and lurid allegations were "obvious lies." These are precisely the messages Mr. Barden sent to them.

The general nature of Mr. Barden's assertions ("allegations," "original allegations," "claims"), the distinction between plaintiff's "original" and "new" allegations, and the inferences he drew from comparing the "original" and "new" allegations—together—powerfully demonstrate that the January 2015 statement was nothing more than opinion.

B. In this Rule 56 proceeding, this Court's Rule 12(b)(6) opinion does not control the question of law whether the January 2015 statement constitutes nonactionable opinion.

In its Rule 12(b)(6) opinion the Court, relying on *Davis v. Boenheim*, 22 N.E.3d 999 (2014), ruled that the three allegedly defamatory statements in the January 2015 statement (*see* Doc.1 ¶ 30(a)-(c)) have a specific and readily understood factual meaning, are capable of being proven true or false, and "clearly constitute fact to the reader." Doc.37 at 9. We respectfully suggest the Court's Rule 12(b)(6) decision does not control in this Rule 56 proceeding.

To begin with, the standards for deciding a Rule 12(b)(6) motion are substantially different from the standards for deciding a Rule 56 motion. As the Court noted, in deciding a 12(b)(6) motion the court must accept as true the factual allegations and draw all inferences in the plaintiff's favor; a plaintiff need only state a claim that is "plausible on its face." *Id.* at 3 (internal quotations omitted). In contrast, in deciding a Rule 56 motion the plaintiff defending the motion may *not* "rest on [the] allegations" in her complaint. *Anderson*, 477 U.S. at 249. The difference in the standards is crucial here.

As this Court recognized, "[t]he dispositive inquiry" for purposes of deciding whether an allegedly defamatory statement is fact or nonactionable opinion is whether "a reasonable reader could have concluded that the statements were conveying facts about the plaintiff."

Doc.37 at 7 (quoting *Davis*, 22 N.E.3d at 1005). To answer that inquiry, the Court applied the three factors enumerated in *Davis*. *See id.* These three factors are the same as the four factors in *Immuno AG*; the difference is that the *Davis* court collapsed the *Immuno AG*'s third and fourth factors into one. *See Davis*, 22 N.E.3d at 1005.

As framed by the *Davis* court, the third factor is “whether either the *full context of the communication* in which the statement appears or the *broader social context and surrounding circumstances* are such as to signal . . . readers or listeners that what is being read or heard is likely to be opinion, not fact.” *Id.* (internal quotations omitted; emphasis supplied), *quoted in* Doc.37 at 7. Although this Court did not note this in its opinion, this third factor “is often *the key consideration* in categorizing a statement as fact or opinion.” *Id.* at 1006 (emphasis supplied).

As in *Davis*, which also was decided on a Rule 12(b)(6) motion,²³ this Court when considering the third factor did not have the benefit of any of the evidence presented in this motion. That is to say, the Court did not have the “full context of the” July 2015 statement or the “broader social context and surrounding circumstances” of the statement, since none of the evidence presented in this Motion was pleaded in the Complaint.

Nor, in the context of the 12(b)(6) motion, did the Court consider that the relevant “readers” of the July 2015 statement were not the “average reader”²⁴ in the general public, but a “cynical”²⁵ and “sophisticated”²⁶ group of about 30 reporters and journalists who were knowledgeable about plaintiff’s allegations of being the victim of sexual abuse and sexual

²³*Davis*, 22 N.E.3d at 1001.

²⁴*Aronson*, 483 N.E.2d at 1139.

²⁵Steven Shiffrin, *The Politics of the Mass Media and the Free Speech Principle*, 69 Ind. L.J. 689, 702 (1994).

²⁶*Dibella*, 2002 WL 31427362, at *2.

trafficking. Viewing the July 2015 statement from the perspective of these reporters and journalists—the only persons who received the July 2015 statement—presents a different landscape in the “fact versus opinion” analysis.

Applying the third factor with the benefit of the Rule 56 records compels a conclusion different from the one this Court reached on the barren Rule 12(b)(6) record. For example, this Court did not consider that the media-recipients of the July 2015 statement would have understood the statement in precisely the way Mr. Barden intended: Based on a comparison of dramatic differences between her “original” and “new” allegations, Ms. Giuffre is a teller of falsehoods—is a liar—and cannot be trusted, and her new CVRA joint-motion allegations, which deviated so substantially from her originally allegations, are falsehoods—proven false by her increasingly provocative and lurid versions of her story of “victimhood.” *See generally* Exhibit J.

III. The pre-litigation privilege bars this action.

Statements pertinent to a good faith anticipated litigation made by attorneys (or their agents under their direction²⁷) before the commencement of litigation are privileged and “no cause of action for defamation can be based on those statements,” *Front, Inc. v. Khalil*, 28 N.E.3d 15, 16 (N.Y. 2015). So long as there was “a good faith basis to anticipate litigation,” a statement concerning either “actual litigation or prelitigation matters” is subject to an “*absolute privilege*.” *Flomenhaft v. Finkelstein*, 8 N.Y.S.3d 161, 164 n.2 (App. Div. 2015) (emphasis supplied); *accord Kirk v. Heppt*, 532 F. Supp. 2d 586, 593 (S.D.N.Y. 2008).

The privilege covers statements made in connection with “pending or “*contemplated* litigation.” *Goldstein v. Cogswell*, No. 85 CIV. 9256 (KMW), 1992 WL 131723, at *27 n.32 (S.D.N.Y. June 1, 1992) It covers statements made outside court, including in written

²⁷*See Chambers v. Wells Fargo Bank, N.A.*, No. 2016 WL 3533998, at *8 (D.N.J. June 28, 2016); *see generally Hawkins v. Harris*, 661 A.2d 284, 289-91 (N.J. 1995).

communications “between litigating parties or their attorneys.” *Klein v. McGauley*, 29 A.D.2d 418, 420 (N.Y. App. Div. 1968), *cited with approval in Petrus v. Smith*, 91 A.D.2d 1190, 1191 (N.Y. App. Div. 1983). It covers “cease and desist letters.” *Khalil*, 28 N.E.3d at 19. And it covers “all pertinent communications among the parties, counsel, witnesses and the court,” regardless “[w]hether a statement was made in or out of court, was on or off the record, or was made orally or in writing.” *Frechtman v. Gutierrez*, 979 N.Y.S. 2d 58 (App. Div. 2014) (quoting *Sexter v. Warmflash, P.C. v. Margrave*, 828 N.Y.S. 2d 315 (App. Div. 2007)).

When the pre-litigation privilege is invoked in connection with an allegedly defamatory statement made during pending or contemplated litigation, “any doubts are to be resolved in favor of pertinence.” *Flomenhaft*, 8 N.Y.S.3d at 164. “[T]he test to determine whether a statement is pertinent to litigation is “‘extremely liberal,’” such that the offending statement, to be actionable, must have been ‘*outrageously out of context.*’” *Id.* at 164-65 (emphasis supplied; quoting *Black v. Green Harbour Homeowners’ Ass’n*, 798 N.Y.S.2d 753 (App. Div. 2005), and *Martirano v. Frost*, 255 N.E.2d 693 (1969)); *Kirk*, 532 F. Supp. 2d at 593.

In denying Ms. Maxwell’s motion to dismiss the Complaint based on the pre-litigation privilege, this Court limited its analysis of the privilege to whether under the Rule 12(b)(6) standard plaintiff had sufficiently pleaded that the January 2 and 4 statements were made with actual malice. Doc.37 at 18-19. The Court’s Rule 12(b)(6) analysis does not bear on the question presented here, for two reasons.

Under the “substantive law”²⁸ actual malice is not relevant to the pre-litigation defense. The New York Court of Appeals in *Khalil* held that to prevail on the pre-litigation privilege the defendant need only establish one element: the allegedly defamatory statement at issue was

²⁸*Anderson*, 477 U.S. at 248.

“pertinent to a good faith anticipated litigation.” 28 N.E.3d at 16. Upon establishing that element, summary judgment for the defendant is required. *See id.* Additionally, this is a summary judgment proceeding. Plaintiff cannot rely on the allegations of her Complaint. Evidence is required.

The following evidence is not in dispute. By January 2015 Ms. Maxwell had retained British Solicitor Philip Barden to represent and advise her in connection with plaintiff’s publication in the British press of salacious, defamatory allegations of criminal sexual abuse during the period 1999-2002. EXHIBIT K ¶¶ 8-10. Mr. Barden in turn engaged UK press agent Ross Gow. *Id.* ¶ 9. Mr. Barden prepared the January 2015 statement and instructed Mr. Gow to transmit it via email to members of the UK media who had made inquiry about the allegations in the joinder motion. *Id.* ¶ 10.

Mr. Barden did not intend the January 2015 statement as a traditional press release solely to disseminate information to the media. *Id.* ¶ 15. This is why he intentionally did not request that Mr. Gow or any other public relations specialist prepare the statement. *Id.* Instead, Mr. Gow served as his conduit to the media representatives who had requested a response to the joinder motion allegations and who Mr. Barden believed might republish those allegations. *Id.*

Mr. Barden had two purposes in preparing and causing the statement to be disseminated to those media representatives. First, he wanted to mitigate the harm to Ms. Maxwell’s reputation from the press’s republication of plaintiff’s false allegations. *Id.* ¶ 16. He believed these ends could be accomplished by suggesting to the media that, among other things, they should subject plaintiff’s allegations to inquiry and scrutiny. *Id.* For example, he noted in the January 2015 statement that plaintiff’s allegations changed dramatically over time, suggesting that they are “obvious lies” and therefore should not be “publicised as news.” *Id.*

Second, Mr. Barden intended the January 2015 statement to be “a shot across the bow” of the media, which he believed had been unduly eager to publish plaintiff’s allegations without conducting any inquiry of their own. *Id.* ¶ 17. This was the purpose of repeatedly stating that plaintiff’s allegations were “defamatory.” *Id.* The statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of plaintiff’s obviously false allegations and the legal indefensibility of their own conduct. *Id.*

At the time Mr. Barden directed the issuance of the statement, he was contemplating litigation against the media-recipients as an additional means to mitigate and prevent harm to Ms. Maxwell. *Id.* ¶ 28. Toward this end, he prepared the statement so that it made clear Ms. Maxwell “strongly denie[d] the allegations of an unsavoury nature,” declared the republications of the allegations to be false, gave the press-recipients notice that the republications of the allegations “are defamatory,” and informed them that Ms. Maxwell was “reserv[ing] her right to seek redress.” *Id.* ¶ 30. In any such UK defamation, or other related, action Ms. Giuffre would be a defendant or a witness. *Id.* ¶ 29.

The question presented is whether Mr. Barden’s statement, which he directed to be sent to various media representatives, is “pertinent to a good faith anticipated litigation,” *Khalil*, 28 N.E.3d at 16.

The requirement of “good faith” anticipated litigation is intended to prevent attorneys (or their agents) from “bully[ing], harass[ing], or intimidat[ing] their client’s adversaries by threatening baseless litigation or by asserting unmeritorious claims, unsupported in law and fact, in violation of counsel’s ethical obligations,” *id.* at 19. The statement Mr. Barden prepared and caused to be issued was not intended to bully, harass or intimidate the press-recipients, i.e., the

potential defendants in an action by Ms. Maxwell for defamation. *See* EXHIBIT K ¶¶ 26-30.

Nothing about the statement on its face suggested bullying, harassing or intimidating the press-recipients (or anyone else). At the time Mr. Barden directed the issuance of the statement, he had sufficient factual and legal grounds to pursue in good faith a defamation action against one or more of the press-recipients for republishing plaintiff's allegations. *See generally id.* ¶¶ 8-30.

That the statement was directed at the press-recipients—which had republished plaintiff's false allegations and was not directed at plaintiff—is irrelevant to the absolute privilege protecting pre-litigation communications. In *International Publishing Concepts, LLC v. Locatelli*, letters and emails detailing likely litigation and an intent to sue were extended the same pre-litigation privilege although sent to two non-parties who were only potentially affected by the litigation or witnesses to it. *See also Kirk*, 532 F. Supp. 2d at 593 (“The privilege is broad, and embraces anything that may possibly or plausibly be relevant to the litigation.”) (internal quotations omitted).

The only issue remaining is whether the statement was pertinent to the contemplated litigation. Applying the “extremely liberal” test of pertinence, in which “any doubts are to be resolved in favor of pertinence,”²⁹ the court must decide whether the allegedly defamatory statement is “outrageously out of context” in relation to the contemplated litigation. *Flomenhaft*, 8 N.Y.S.3d at 164-65 (internal quotations omitted). Nothing in the statement is “outrageously out of context.” Every statement was directly related to the press-recipients' republication of plaintiff's false allegations against Ms. Maxwell.

The January 4 statement also is absolutely privileged. According to plaintiff, Ms. Maxwell told a reporter on that date when asked to comment on plaintiff's joinder-motion

²⁹*Flomenhaft*, 8 N.Y.S.3d at 164 (internal quotations omitted).

allegations: “I am referring to the statement that was made.” Doc.1 ¶ 32. Assuming *arguendo* the statement is defamatory,³⁰ it is absolutely privileged since it simply refers to an absolutely privileged statement. *See, e.g., Klein*, 29 A.D.2d at 420 (privilege protects communications “between litigating parties”); *Frechtman*, 979 N.Y.S.2d at 63 (privilege protects communications “made in or out of court, ... on or off the record, ... orally or in writing”) (internal quotations omitted).

Under these circumstances the pre-litigation privilege is absolute and “no cause of action for defamation can be based on those statements,” *Khalil*, 28 N.E.3d at 16. The Court should enter summary judgment on plaintiff’s defamation claim.

IV. Ms. Maxwell’s January 4, 2015, statement is nonactionable.

Plaintiff alleges that on January 4, 2015, a reporter approached Ms. Maxwell on a public street in Manhattan and “asked Maxwell about Giuffre’s allegations against Maxwell.” Doc.1 ¶ 37. Plaintiff alleges that Ms. Maxwell responded with a single sentence: ““I am referring to the statement that we made.”” *Id.* According to plaintiff, Ms. Maxwell’s statement was defamatory. *See id.* ¶ 37 & Count I ¶ 5, at 8. Judgment should enter against plaintiff as to Ms. Maxwell’s statement.

Adelson controls this portion of plaintiff’s defamation claim. In *Adelson* a non-profit organization during the 2012 presidential campaign published a statement on its website critical of Sheldon Adelson, a wealthy Republican donor. The statement alleged Adelson had donated “tainted” and “dirty” money to Governor Romney. Eight days later the organization withdrew the statement from its website. On the same day it issued a press release explaining that although

³⁰As discussed in Argument IV, the January 4 statement is nonactionable.

it took down the statement, “we stand by everything we said, which was sourced from current, credible news accounts.” 973 F. Supp. 2d at 474.

Adelson sued. He alleged that the statement was defamatory and that the press release constituted a republication of the defamatory statement. This court held that the statement contained only constitutionally protected opinion and was nonactionable. The court then rejected the defamation claim based on republication: “[A] mere reference to another writing that contains defamatory matter does not constitute an actionable repetition or republication.” *Id.* (quoting *Goforth v. Avemco Life Ins. Co.*, 368 F.2d 25, 28 n.7 (4th Cir.1966)). This is the settled rule. *See In re Philadelphia Newspapers, LLC*, 690 F.3d 161, 175 (3d Cir. 2012), *as corrected* (Oct. 25, 2012) (“under traditional principles of republication, a mere reference to an article, regardless how favorable it is as long as it does not restate the defamatory material, does not republish the material”); *Salyer v. S. Poverty Law Ctr., Inc.*, 701 F. Supp. 2d 912, 916 (W.D. Ky. 2009) (“[T]he common thread of traditional republication is that it presents the material, in its entirety, before a new audience. A mere reference to a previously published article does not do that.”).

Ms. Maxwell’s one-sentence response that merely referenced an earlier statement is nonactionable. This Court should enter partial summary judgment on the defamation claim to the extent it is based on Ms. Maxwell’s response.

V. The defamation claim should be dismissed because the publication is substantially true.

“‘[A] statement is substantially true if the statement would not “have a different effect on the mind of the reader from that which the pleaded truth would have produced.”’” *Franklin v. Daily Holdings, Inc.*, 21 N.Y.S.3d 6, 12 (App. Div. 2015) (quoting *Biro v. Condé Nast*, 883 F. Supp. 2d 441, 458 (S.D.N.Y. 2012) (quoting *Jewell v. NYP Holdings, Inc.*, 23 F. Supp. 2d 348,

366 (S.D.N.Y.1998) (quoting *Fleckenstein v. Friedman*, 193 N.E. 537, 538 (1934))). Indeed, it is well settled in New York “that an alleged libel is not actionable if the published statement could have produced no worse an effect on the mind of a reader than the truth pertinent to the allegation.” *Id.* (internal quotations omitted). “When the truth is so near to the facts as published that fine and shaded distinctions must be drawn and words pressed out of their ordinary usage to sustain a charge of libel, no legal harm has been done.” *Fleckenstein*, 193 N.E. at 538.

For the reasons articulated in Argument VI, the January 2015 statement is substantially true as matter of law.

VI. Plaintiff cannot establish actual malice by clear and convincing evidence.

A. Facts.

The following numbered facts are not in dispute and are sequentially numbered following the undisputed facts cited earlier. *See* This Motion at ¶¶ 1-36.

37. Plaintiff lived independently from her parents with her fiancé long before meeting Epstein or Ms. Maxwell. After leaving the Growing Together drug rehabilitation facility in 1999, plaintiff moved in with the family of a fellow patient. EXHIBIT L at 7-8, 12-14. There she met, and became engaged to, her friend’s brother, James Michael Austrich. *Id.* & at 19. She and Austrich thereafter rented an apartment in the Ft. Lauderdale area with another friend and both worked at various jobs in that area. *Id.* at 11, 13-17. Later, they stayed briefly with plaintiff’s parents in the Palm Beach/Loxahatchee, Florida area before Austrich rented an apartment for the couple on Bent Oak Drive in Royal Palm Beach. *Id.* at 17, 19, 25-27; EXHIBIT M. Although plaintiff agreed to marry Austrich, she never had any intention of doing so. EXHIBIT N at 127-128.

38. Plaintiff re-enrolled in high school from June 21, 2000 until March 7, 2002. After finishing the 9th grade school year at Forest Hills High School on June 9, 1999, plaintiff re-

enrolled at Wellington Adult High School on June 21, 2000, again on August 16, 2000 and on August 14, 2001. EXHIBIT O. On September 20, 2001, Plaintiff then enrolled at Royal Palm Beach High School. *Id.* A few weeks later, on October 12, 2001, she matriculated at Survivors Charter School. *Id.* Survivor's Charter School was an alternative school designed to assist students who had been unsuccessful at more traditional schools. EXHIBIT P at 23-24. Plaintiff remained enrolled at Survivor's Charter School until March 7, 2002. EXHIBIT O. She was present 56 days and absent 13 days during her time there. *Id.* Plaintiff never received her high school diploma or GED. EXHIBIT Q at 475, 483. Plaintiff and Figueroa went "back to school" together at Survivor's Charter School. EXHIBIT P at 23-27. The school day there lasted from morning until early afternoon. *Id.* at 23-27, 144-46.

39. During the year 2000, plaintiff worked at numerous jobs. In 2000, while living with her fiancé, plaintiff held five different jobs: at Aviculture Breeding and Research Center, Southeast Employee Management Company, The Club at Mar-a-Lago, Oasis Outsourcing, and Neiman Marcus. EXHIBIT R. Her taxable earnings that year totaled nearly \$9,000. *Id.* Plaintiff cannot now recall either the Southeast Employee Management Company or the Oasis Outsourcing jobs. EXHIBIT Q at 470-471.

40. Plaintiff's employment at the Mar-a-Lago spa began in fall 2000. Plaintiff's father, Sky Roberts, was hired as a maintenance worker at the The Mar-a-Lago Club in Palm Beach, Florida, beginning on April 11, 2000. EXHIBIT S. Mr. Roberts worked there year-round for approximately 3 years. *Id.*; EXHIBIT T at 72-73. After working there for a period of time, Mr. Roberts became acquainted with the head of the spa area and recommended plaintiff for a job there. *Id.* at 72. Mar-a-Lago closes every Mother's Day and reopens on November 1. EXHIBIT U at Mar-a-Lago0212. Most of employees Mar-a-Lago, including all employees of the spa area

such as “spa attendants,” are “seasonal” and work only when the club is open, i.e., between November 1 and Mother’s Day. EXHIBIT T at 72-73; EXHIBIT U at MAR-A-LAGO 0212; EXHIBIT V. Plaintiff was hired as a “seasonal” spa attendant to work at the Mar-a-Lago Club in the fall of 2000 after she had turned 17.

41. **Plaintiff represented herself as a masseuse for Jeffrey Epstein.** While working at the Mar-a-Lago spa and reading a library book about massage, plaintiff met Ms. Maxwell. Plaintiff thereafter told her father that she got a job working for Jeffrey Epstein as a masseuse. EXHIBIT T at 79. Plaintiff’s father took her to Epstein’s house on one occasion around that time, and Epstein came outside and introduced himself to Mr. Roberts. *Id.* at 82-83. Plaintiff commenced employment as a traveling masseuse for Mr. Epstein. Plaintiff was excited about her job as a masseuse, about traveling with him and about meeting famous people. EXHIBIT L at 56; EXHIBIT P at 126. Plaintiff represented that she was employed as a masseuse beginning in January 2001. EXHIBIT M; EXHIBIT N. Plaintiff never mentioned Ms. Maxwell to her then-fiancé, Austrich. EXHIBIT L at 74. Plaintiff’s father never met Ms. Maxwell. EXHIBIT T at 85.

42. **Plaintiff resumed her relationship with convicted felon Anthony Figueroa.** In spring 2001, while living with Austrich, plaintiff lied to and cheated on him with her high school boyfriend, Anthony Figueroa. EXHIBIT L at 68, 72. Plaintiff and Austrich thereafter broke up, and Figueroa moved into the Bent Oak apartment with plaintiff. EXHIBIT L at 20; EXHIBIT P at 28. When Austrich returned to the Bent Oak apartment to check on his pets and retrieve his belongings, Figueroa in Plaintiff’s presence punched Austrich in the face. EXHIBIT X; EXHIBIT L at 38-45. Figueroa and plaintiff fled the scene before police arrived. EXHIBIT X. Figueroa was then a convicted felon and a drug abuser on probation for possession of a controlled substance. EXHIBIT Y.

43. **Plaintiff freely and voluntarily contacted the police to come to her aid in 2001 and 2002 but never reported to them that she was Epstein's "sex slave."** In August 2001 at age 17, while living in the same apartment, plaintiff and Figueroa hosted a party with a number of guests. EXHIBIT Z. During the party, according to plaintiff, someone entered plaintiff's room and stole \$500 from her shirt pocket. *Id.* Plaintiff contacted the police. She met and spoke with police officers regarding the incident and filed a report. She did not disclose to the officer that she was a "sex slave." A second time, in June 2002, plaintiff contacted the police to report that her former landlord had left her belongings by the roadside and had lit her mattress on fire. EXHIBIT AA. Again, plaintiff met and spoke with the law enforcement officers but did not complain that she was the victim of any sexual trafficking or abuse or that she was then being held as a "sex slave." *Id.*

44. **From August 2001 until September 2002, Epstein and Maxwell were almost entirely absent from Florida on documented travel unaccompanied by Plaintiff.** Flight logs maintained by Epstein's private pilot Dave Rodgers evidence the substantial number of trips away from Florida that Epstein and Maxwell took, unaccompanied by Plaintiff, between August 2001 and September 2002. EXHIBIT BB. Rodgers maintained a log of all flights on which Epstein and Maxwell traveled with him. EXHIBIT CC at 6-15. Epstein additionally traveled with another pilot who did not keep such logs and he also occasionally traveled via commercial flights. *Id.* at 99-100, 103. For substantially all of thirteen months of the twenty-two months (from November 2000 until September 2002) that Plaintiff lived in Palm Beach and knew Epstein, Epstein was traveling outside of Florida unaccompanied by Plaintiff. EXHIBIT BB. During this same period of time, Plaintiff was employed at various jobs, enrolled in school, and living with her boyfriend.

45. **Plaintiff and Figueroa shared a vehicle during 2001 and 2002.** Plaintiff and Figueroa shared a '93 white Pontiac in 2001 and 2002. EXHIBIT P at 67; EXHIBIT EE. Plaintiff freely traveled around the Palm Beach area in that vehicle. *Id.* In August 2002, Plaintiff acquired a Dodge Dakota pickup truck from her father. EXHIBIT P at 67-68. Figueroa used that vehicle in a series of crimes before and after Plaintiff left for Thailand. *Id.*; EXHIBIT FF.

46. **Plaintiff held a number of jobs in 2001 and 2002.** During 2001 and 2002, plaintiff was gainfully employed at several jobs. She worked as a waitress at Mannino's Restaurant, at TGIFriday's restaurant (aka CCI of Royal Palm Inc.), and at Roadhouse Grill. EXHIBIT R. She also was employed at Courtyard Animal Hospital (aka Marc Pinkwasser DVM). *Id.*; EXHIBIT W.

47. **In September 2002, Plaintiff traveled to Thailand to receive massage training and while there, met her future husband and eloped with him.** Plaintiff traveled to Thailand in September 2002 to receive formal training as a masseuse. Figueroa drove her to the airport. While there, she initially contacted Figueroa frequently, incurring a phone bill of \$4,000. EXHIBIT P at 35. She met Robert Giuffre while in Thailand and decided to marry him. She thereafter ceased all contact with Figueroa from October 2002 until two days before Mr. Figueroa's deposition in this matter in May 2016. *Id.* at 29, 37.

48. **Detective Recarey's investigation of Epstein failed to uncover any evidence that Ms. Maxwell was involved in sexual abuse of minors, sexual trafficking or production or possession of child pornography.** Joseph Recarey served as the lead detective from the Palm Beach Police Department charged with investigating Jeffrey Epstein. EXHIBIT GG at 10. That investigation commenced in 2005. *Id.* Recarey worked only on the Epstein case for an entire year. *Id.* at 274. He reviewed previous officers' reports and interviews, conducted numerous interviews of witnesses and alleged victims himself, reviewed surveillance footage of the Epstein

home, participated in and had knowledge of the search warrant executed on the Epstein home, and testified regarding the case before the Florida state grand jury against Epstein. *Id.* at 212-15. Detective Recarey's investigation revealed that not one of the alleged Epstein victims ever mentioned Ms. Maxwell's name and she was never considered a suspect by the government. *Id.* at 10-11, 177, 180-82, 187-96, 241-42, 278. None of Epstein's alleged victims said they had seen Ms. Maxwell at Epstein's house, nor said they had been "recruited by her," nor paid any money by her, nor told what to wear or how to act by her. *Id.* Indeed, none of Epstein's alleged victims ever reported to the government they had met or spoken to Ms. Maxwell. *Id.* Maxwell was not seen coming or going from the house during the law enforcement surveillance of Epstein's home. *Id.* at 214-215. The arrest warrant did not mention Ms. Maxwell and her name was never mentioned before the grand jury. *Id.* at 203, 211. No property belonging to Maxwell, including "sex toys" or "child pornography," was seized from Epstein's home during execution of the search warrant. *Id.* at 257. Detective Recarey, when asked to describe "everything that you believe you know about Ghislaine Maxwell's sexual trafficking conduct," replied, "I don't." *Id.* at 278. He confirmed he has no knowledge about Ms. Maxwell sexually trafficking anybody. *Id.* at 278-79. Detective Recarey also has no knowledge of Plaintiff's conduct that is subject of this lawsuit. *Id.* at 259-60.

49. **No nude photograph of Plaintiff was displayed in Epstein's home.** Epstein's housekeeper, Juan Alessi, "never saw any photographs of Virginia Roberts in Mr. Epstein's house." EXHIBIT HH at ¶ 17. Detective Recarey entered Epstein's home in 2002 to install security cameras to catch a thief and did not observe any "child pornography" within the home, including on Epstein's desk in his office. EXHIBIT GG at 289-90.

50. **Plaintiff intentionally destroyed her “journal” and “dream journal” regarding her “memories” of this case in 2013 while represented by counsel.** Plaintiff drafted a “journal” describing individuals to whom she claims she was sexually trafficked as well as her memories and thoughts about her experiences with Epstein. EXHIBIT II at 64-65, 194; EXHIBIT N at 205-08. In 2013, she and her husband created a bonfire in her backyard in Florida and burned the journal together with other documents in her possession. *Id.* Plaintiff also kept a “dream journal” regarding her thoughts and memories that she possessed in January 2016. EXHIBIT II at 194-96. To date, Plaintiff cannot locate the “dream journal.” *Id.*³¹

51. **Plaintiff publicly peddled her story beginning in 2011.** Plaintiff granted journalist Sharon Churcher extensive interviews that resulted in seven (7) widely distributed articles from March 2011 through January 2015. Churcher regularly communicated with plaintiff and her “attorneys or other agents” from “early 2011” to “the present day.” *See* Doc.216 ¶¶ 2-11 and referenced exhibits; Doc.261-1 to 216-8, incorporated by reference. Plaintiff received approximately \$160,000 for her stories and pictures that were published by many news organizations. EXHIBIT N at 247-48.

52. **Plaintiff drafted a 144-page purportedly autobiographical book manuscript in 2011 which she actively sought to publish.** In 2011, contemporaneous with her Churcher interviews, plaintiff drafted a book manuscript which purported to document plaintiff’s experiences as a teenager in Florida, including her interactions with Epstein and Maxwell. EXHIBIT KK. Plaintiff communicated with literary agents, ghost writers and potential independent publishers in an effort to get her book published. She generated marketing materials

³¹ Defendant has moved for sanctions against plaintiff premised on her admitted destruction of this evidence. Doc.509-510.

and circulated those along with book chapters to numerous individuals associated with publishing and the media.

53. **Plaintiff's publicly filed "lurid" CVRA pleadings initiated a media frenzy and generated highly publicized litigation between her lawyers and Alan Dershowitz.** On December 30, 2014, plaintiff, through counsel, publicly filed a joinder motion that contained her "lurid allegations" about Ms. Maxwell and many others, including Alan Dershowitz, Prince Andrew, Jean-Luc Brunel. The joinder motion was followed by a "corrected" motion (EXHIBIT D) and two further declarations in January and February 2015, which repeated many of plaintiff's claims. These CVRA pleadings generated a media maelstrom and spawned highly publicized litigation between plaintiff's lawyers, Edwards and Cassell, and Alan Dershowitz. After plaintiff publicly alleged Mr. Dershowitz of sexual misconduct, Mr. Dershowitz vigorously defended himself in the media. He called plaintiff a liar and accused her lawyers of unethical conduct. In response, attorneys Edwards and Cassell sued Dershowitz who counterclaimed. This litigation, in turn, caused additional media attention by national and international media organizations. *See* Doc.363 at 363-1 through 363-14.

54. **Plaintiff formed non-profit Victims Refuse Silence to attract publicity and speak out on a public controversy.** In 2014, plaintiff, with the assistance of the same counsel, formed a non-profit organization, Victims Refuse Silence. According to plaintiff, the purpose of the organization is to promote plaintiff's professed cause against sex slavery. The stated goal of her organization is to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse. EXHIBIT LL. Plaintiff attempts to promote Victims Refuse Silence at every opportunity. EXHIBIT MM at 17-18. For example, plaintiff participated

in an interview in New York with ABC to promote the charity and to get her mission out to the public. *Id.* at 28.

B. Plaintiff carries the burden of proving actual malice by clear and convincing evidence.

In *New York Times Co. v. Sullivan*, 376 U.S. 254, 270 (1964), the Supreme Court recognized that our country has made a “profound national commitment to the principle that debate on public issues should be uninhibited, robust, and wide-open.” The overriding importance of that commitment led to the Court’s holding that “neither factual error nor defamatory content, nor a combination of the two, sufficed to remove the First Amendment shield,” *Bartnicki v. Vopper*, 532 U.S. 514, 535 (2001), from speech relating to public officials and public figures. *See, e.g., Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 345 (1974). Under the First Amendment of the Constitution and Article I, Section 8, of the New York Constitution, in defamation actions by public officials and public figures and in defamation actions concerning matters of public concern, the plaintiff must prove that the allegedly defamatory statement was made with “actual malice.” *See, e.g., id.; Philadelphia Newspapers, Inc. v. Hepps*, 475 U.S. 767, 776-77 (1986); *Huggins v. Moore*, 726 N.E.2d 456, 460 (N.Y. 1999); *McGill v. Parker*, 582 N.Y.S.2d 91, 97 (App. Div. 1992).

As the Supreme Court has noted, the term “actual malice” can be confusing because in the First Amendment context “it has nothing to do with bad motive or ill will.” *Harte-Hanks Communic’ns, Inc. v. Connaughton*, 491 U.S. 657, 666 n.7 (1989). Instead proof of actual malice requires evidence that the publication contains a “material”³² false statement of fact that was made “with knowledge that the statement was false or with reckless disregard as to whether or

³²*Air Wisconsin Airlines Corp. v. Hoeper*, 134 S. Ct. 852, 861 (2014) (“minor inaccuracies do not amount to falsity so long as ‘the substance, the gist, the sting, of the libelous charge be justified’”) (internal quotations and brackets omitted).

not it was true.” *Id.* at 667 (internal quotations omitted). Reckless disregard means the defendant made the false publication “with a high degree of awareness of probable falsity” or “entertained serious doubts as to the truth of [the] publication.” *Id.* (internal quotations omitted).

In a defamation action, a plaintiff will be required to prove actual malice in two different and independent contexts: a defamation action in which the plaintiff is a public figure, and a defamation action in which the defendant asserts the privilege of reply.

The defamation plaintiff at trial and in summary judgment proceedings must prove her case by clear and convincing evidence.

C. Plaintiff is a public figure who must prove actual malice.

Public figures include those who have “thrust themselves to the forefront of particular public controversies in order to influence the resolution of the issues involved. . . . [T]hey invite attention and comment.” *Gertz*, 418 U.S. at 345. The essential element for a finding that a person is a public figure is that she has “taken an affirmative step to attract public attention,” has “strived to achieve a measure of public acclaim.” *James v. Gannett Co.*, 353 N.E.2d 834, 876 (N.Y. 1976).

In *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964), the United States Supreme Court held that, in cases involving public officials, the interests of an individual are trumped by society's interest in promoting free press discussion of matters of general concern. *Biro v. Condé Naste*, 963 F. Supp. 2d 255, 269 (S.D.N.Y. 2013). Thus, the Court held that a public official alleging defamation must establish that a falsehood has been published with “actual malice.” *Sullivan*, 376 U.S. at 279-80; accord, *Lerman v. Flynt Dist. Co., Inc.*, 745 F.3d 123, 136 (2d Cir. 1984); *Biro*, 963 F. Supp. 2d at 269. Subsequently, the Supreme Court extended this standard to all public figures, *Curtis Publ'g Co. v. Butts*, 388 U.S. 130 (1967), and decided in *Gertz v. Robert Welch, Inc.*, 418 U.S. 323 (1974), that individuals that “are not public figures for all purposes

may still be public figures with respect to a particular controversy.” *Contemporary Mission, Inc. v. N.Y. Times Co.*, 842 F.2d 612, 617 (2d Cir. 1988).

As the Second Circuit has observed, the reason for distinguishing between private and public figures in defamation claims flows from the recognition of two things: First, “that private figure are more vulnerable to injury from defamation, because public figures have greater access to the media and thus are in a better position to contradict a lie or correct an error.”

Contemporary Mission, Inc., 842 F.2d at 619-20. Second, “**and more important**, public figures generally ‘have voluntarily exposed themselves to increased risk of injury from defamatory falsehood concerning them.’” *Id.* at 620 (quoting *N.Y. Times*, 418 U.S. at 344-45) (emphasis added).

In the Second Circuit, to establish that a plaintiff is a limited purpose public figure, a defendant must prove that she:

1. successfully invited public attention to [her] views in an effort to influence others prior to the incident that is the subject of litigation;
2. voluntarily injected [her]self into a public controversy related to the subject of the litigation;
3. assumed a position of prominence in the public controversy; and
4. maintained regular and continuing access to the media.

Lerman, 745 F.2d at 136-37; *accord*, *Contemporary Mission, Inc.*, 842 F.2d at 617; *Biro*, 963 F. Supp. 2d at 270. Statements regarding a limited purpose public figure are subject to enhanced protection only if relevant to the public figure's involvement in a given controversy. *Biro*, 963 F. Supp.2d at 270-71 (citing *Faigin v. Kelly*, 978 F. Supp. 420, 426 (D. N.H. 1997)). “Yet, once a plaintiff is deemed a limited purpose public figure, courts allow the heightened protections to sweep broadly, covering all statements by defendants that are not ‘wholly unrelated to the controversy.’” *Biro*, 963 F. Supp. 2d at 271 (quoting *Waldbaum v. Fairchild Publ'ns, Inc.*, 626

F.2d 1287, 1298 (D.C. Cir. 1980)). The law requires only that “the statement need be no more than generally related to a dispute in issue to qualify for protection.” Robert D. Sack, *Sack on Defamation: Libel, Slander, and Related Problems* (“SACK ON DEFAMATION”) § 5:3.3 (4th ed. 2015).

The question whether a plaintiff is a public figure is a question of law for the court to decide. *Celle v. Filipino Reporter Enters. Inc.*, 209 F.3d 163, 176-77 (2d Cir. 2000); *accord Biro*, 963 F. Supp. 2d at 270.

1. Plaintiff successfully invited public attention to influence others.

The record amply demonstrates that plaintiff invited public attention to herself and her views regarding the Plaintiff’s alleged desire to draw attention to the issue of her purported sex slavery.

Beginning in at least 2011, the Plaintiff met with Sharon Churcher to promote her cause and economic interests. According to Ms. Churcher, the Plaintiff granted Ms. Churcher extensive interviews that resulted in 7 widely distributed articles from March 2011 through January 2015. According to Ms. Churcher, she regularly communicated with the Plaintiff and her “attorneys or other agents” from “early 2011” to “the present day.” *See* Doc.216 ¶¶ 2-11 and referenced exhibits; Docs.261-1 to 216-8, incorporated by reference. Plaintiff was amply compensated for this “public attention” and received approximately \$160,000 for her stories. and pictures that were published by many news organizations. EXHIBIT N at 247-248. Plaintiff had a contract with the news organizations, The Mail on Sunday.

Plaintiff, in addition to selling this story to the media, again thrust herself into the public’s attention when she sought to join the ongoing CVRA litigation against Jeffrey Epstein in the United States District Court in Florida. The Plaintiff, through the same lawyers in this matter, publicly filed a joinder motion that was the equivalent of a press release. The unnecessary and

lurid allegations were ultimately stricken by the Court but accomplished the desired result for the Plaintiff, more public attention. The CVRA pleading created a media frenzy and spawned highly publicized litigation between Plaintiff's lawyers, Edwards and Cassell, and Alan Dershowitz. After the Plaintiff publicly alleged Mr. Dershowitz of sexual misconduct, Mr. Dershowitz vigorously defended himself in the media. He called the Plaintiff a liar and accused her lawyers of unethical conduct. In response, the lawyers, Edwards and Cassell, sued Dershowitz who counterclaimed. This litigation, in turn, caused additional media attention by national and international media organizations. *See* Doc.363 at 363-1 thorough 363-14 and accompanying exhibits.

In addition, plaintiff claims to have established a non-profit organization, Victims Refuse Silence, the purpose of which was to promote plaintiff's professed cause against sex slavery.

In paragraphs 23 through 26 of her complaint in this matter she makes the following admissions on this issue:

- Ultimately, as a mother and one of Epstein's many victims, Giuffre believed that she should speak out about her sexual abuse experiences in hopes of helping others who had also suffered from sexual trafficking and abuse. *Id.* 23
- On December 23, 2014, Giuffre incorporated an organization called Victims Refuse Silence, Inc., a Florida not-for-profit corporation. *Id.* 24
- Giuffre intended Victims Refuse Silence to change and improve the fight against sexual abuse and human trafficking. The goal of her organization was, and continues to be, to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse. Giuffre has now dedicated her professional life to helping victims of sex trafficking. *Id.* 25
- On December 30, 2014, Giuffre moved to join the on-going litigation previously filed by Jane Doe 1 in the Southern District of Florida challenging Epstein's non-prosecution agreement by filing her own joinder motion. *Id.* 26

In sum, the record includes ample evidence of plaintiff's efforts to garner public attention in order to influence others and the success of those efforts.

2. Plaintiff voluntarily injected herself into public controversies related to the subject of this litigation.

The second prong of the *Lerman* test requires an examination of whether plaintiff voluntarily injected herself into a public controversy related to the subject of the litigation. The Second Circuit has held that the term should be defined broadly to mean “any topic upon which sizeable segments of society have different, strongly held views.” *Lerman*, 745 F.2d at 138; *see also Biro*, 963 F. Supp. 2d at 272 (“A public controversy is simply ‘any topic upon which sizeable segments of society have different, strongly held views,’ even if the topic does ‘not involve political debate or criticism of public officials.’”) (quoting *Lerman*, 745 F.2d at 138) (alteration omitted). The public controversy requirement, however, is not necessarily limited to what would be considered “a classic debate.” SACK ON DEFAMATION § 5:3.11[B]. “An investigation into alleged corruption or drug dealing, for example, could meet the test.” *Id.*

As demonstrated by the Declaration of Ms. Churcher, the articles attached to the declaration, and the joinder motion filed by plaintiff in the CVRA litigation and the litigation initiated by her lawyers there can be no doubt that the plaintiff's actions were voluntary and that she injected herself into this “public controversy.” Indeed, it is clear that plaintiff created this “public controversy.”

3. Plaintiff assumed a position of prominence in the public controversies.

The third relevant factor focuses on whether plaintiff has voluntarily assumed a sufficient degree of prominence in the controversies at issue. Plaintiff sold and published her story. She publicly sought to join the CVRA litigation. She established a non-profit organization, the

mission of which is purportedly to “spread the word for victims of human trafficking”. EXHIBIT MM at 17; *see also* EXHIBIT LL.

According to Brittany Henderson, the Rule 30(b)(6) designee of VRS, plaintiff has “continued to try to promote Victims Refuse Silence at every possible chance she gets ...” EXHIBIT MM at 17-18. Plaintiff participated in an interview in New York with ABC in “the beginning of 2015,” *id.* at 27, so that she could “promote the charity, so that she could start getting her mission out to the public.” *Id.* at 28. Having affirmatively injected herself into the public spotlight in connection with these issues, plaintiff cannot now be heard to argue that this *Lerman* factor has not been satisfied. *Cf. Contemporary Mission*, 842 F.2d at 618-19 (finding the plaintiffs' assertion that they have assumed a private life was “belied by the fact that they continued to thrust themselves into the public eye” through their conduct on behalf of a non-for-profit organization).

4. Plaintiff has maintained regular and continuing access to the media.

Plaintiff has had substantial access to the media. Ms. Churcher has answered every call or email sent by plaintiff. Plaintiff's lawyers have regularly communicated with the media. Plaintiff and her lawyers have been interviewed by numerous major media organizations.

Accordingly, the First Amendment requires that public figures like plaintiff claiming defamation must establish actual malice—actual and material falsity or a high degree of awareness of probable falsity—by clear and convincing evidence. *E.g., Masson v. New Yorker Magazine, Inc.*, 501 U.S. 496, 510 (1991).

D. Plaintiff must also prove actual malice to overcome the defenses of reply and pre-litigation privilege.

The qualified privilege of reply to a defamatory attack is a complete defense to a claim of defamation. *Shenkman v. O'Malley*, 157 N.Y.S.2d 290, 294, 297 (App. Div. 1956). The defense

is available to a person “who has been defamed in the first instance,” here, Ms. Maxwell, and “who, in response to the attack, responds in kind.” *Id.* The privilege of the initially-attacked person (Ms. Maxwell) includes in rebuttal of the initial attack the right to speak the truth, but the right to rebut is not confined to the truth or to mere denial:

This defense of reply is material, of course, only where the response in kind is defamatory. The injury, if any, to plaintiff is excused, because it is the plaintiff who started the altercation. . . .

It is a contradiction in terms to say that the one attacked is a privileged only to speak the truth, and not to make a counter attack, or that legitimate self-defense consists only in a denial of the charge or a statement of what is claimed to be the truth respecting its subject-matter.

Id. (emphasis supplied; quoting *Collier v. Postum Cereal Co.*, 134 N.Y.S. 847, 853 (1st Dep’t 1912)); *see generally* *Restatement of the Law of Torts* (Second) § 594 cmt. k (1977) (noting that to protect her reputation from attack by another person, she is conditionally privileged to publish defamatory matter about her attacker reasonably believed necessary to defend her reputation, “including the statement that [her] accuser is an unmitigated liar”).

A defendant asserting the defense of reply need only establish she has been attacked with a defamatory statement. *See id.* at 297. Beginning no later than 2009 plaintiff attacked Ms. Maxwell with defamatory statements. In 2014, plaintiff knew the press was giving extensive coverage to, and scrutinizing all filings in, the Crime Victim’s Rights Act case pending in the United States District Court for the Southern District of Florida and in plaintiff’s 2009 civil action against Mr. Epstein. Knowing this, plaintiff repeatedly filed papers in court alleging that Ms. Maxwell participated as a “recruiter” in a “sex trafficking” scheme operated by Mr. Epstein. *E.g.*, Exhibit D. In 2011, plaintiff granted “exclusive” interviews to the British tabloid press during which she repeated her false allegations against Ms. Maxwell and also alleged that as part of the “sex trafficking” scheme she had sex with numerous prominent public figures, including

Prince Andrew and Harvard law professor Alan Dershowitz. EXHIBIT A. The false allegations against Ms. Maxwell constituted defamation *per se*.

A plaintiff may defeat a qualified privilege only by proving actual malice. *See, e.g., Kane v. Orange Cnty. Publ'ns*, 649 N.Y.S.2d 23, 26 (App. Div. 1996) (qualified privilege of reply); *see generally Gertz*, 418 U.S. at 323; *Restatement (Second) of Torts*, *supra*, § 594 cmt. b.

E. The January 2015 statement was substantially true, and plaintiff cannot produce clear and convincing evidence of its falsity.

The January 2015 statement accurately and properly denies the factual assertions regarding Ms. Maxwell contained within plaintiff's joinder motion that had been issued two days prior to which it responded. With respect to each claim in the joinder motion that concerns Ms. Maxwell, the evidence elicited through discovery undercuts any evidence – clear and convincing or otherwise – that plaintiff may proffer to buttress her false allegations.

1. The January 2015 statement accurately denied that Ms. Maxwell met Plaintiff when Plaintiff was 15 years old in 1999.

Plaintiff's relative youth at the time of her initial contact with Epstein and Maxwell forms the core of Plaintiff's story, in her joinder motion and in the press, that she was an underage victim of sexual slavery. Plaintiff has made a point of mentioning her age of 15, in the year 1999, as the starting point for her "four years" of "sex slavery" at every opportunity. The young age no doubt heightens the offensiveness of the claimed abusive conduct and also supplies enough time to allow for the "thousands" of times she was purportedly abused and the numerous opportunities for her to be trafficked to countless famous individuals. Reiterating this point in the joinder motion, plaintiff asserted again that she met Ms. Maxwell in the year 1999 when she was a mere 15 years old. EXHIBIT D at 3.

As she now admits and her employment records confirm, plaintiff did not actually meet Ms. Maxwell or Epstein until the year 2000. Plaintiff acknowledges that she did not meet Ms.

Maxwell until she worked at the Mar-A-Lago as a spa attendant, and she confirms that she obtained that job with the assistance of her father who already was employed as a maintenance worker at the club. Records subpoenaed from Mar-A-Lago reflect that plaintiff's father commenced employment on April 11, 2000. EXHIBIT S. Additionally, they show that plaintiff terminated in the year 2000. *Id.* Finally, plaintiff's social security report confirms plaintiff's Mar-a-lago employment was confined to calendar year 2000. EXHIBIT R. Faced with overwhelming proof that her claims of meeting Ms. Maxwell at the age of 15 in the year 1999 were false, plaintiff finally conceded as much at her deposition on May 3, 2016. EXHIBIT N at 25-28. She also confessed that she did not spend her "sweet 16th" birthday with Ms. Maxwell, as detailed in her book manuscript and in the press. *Compare* EXHIBIT N at 101-02 *with* EXHIBIT KK at Giuffre04173 ("I spent my sweet 16th birthday on his island in the Caribbean next to 'St. James Isle' he liked to call it 'Little St. Jeff's', his ego was as enormous as his appetite for fornicating. I was given a birthday cake and a new collection of designer make-up from London. Ghislaine made a joke after I blew out my array of candles and said, 'I'd be soon getting too old for Jeffrey's taste, and soon they'd have to trade me in.'"); Paul Lewis, "Jeffrey Epstein: Inside the Decade of Scandal Entangling Prince Andrew," *The Guardian* (Jan. 10, 2015)³³.

Yet, even after conceding she was off by a year, plaintiff persists in suggesting that she must have been a mere "16 year old" when she worked at Mar-a-Lago and met Ms. Maxwell. It was, she testified, a "summer job" for which she had taken a break from school, and she did not turn 17 until later that summer on August 9, 2000. EXHIBIT N at 25-28, 57,104, 113. But the Mar-a-Lago documents conclusively disprove this claim: the spa where plaintiff worked closes every year from Mother's Day until November 1. EXHIBIT U at Mar-a-Lago0212 ("The club

³³ <https://www.theguardian.com/world/2015/jan/10/jeffrey-epstein-decade-scandal-prince-andrew> (last visited Jan. 6, 2017).

never shuts down from November 1 to Mother's Day.”). Spa attendants such as plaintiff are “seasonal” employees. *Id.* Indeed, the spa advertises for its new employees in local newspapers in the fall of every year. EXHIBIT V. Even plaintiff's father – a long time employee of Mar-a-Lago -- described the seasonal nature of the club during his deposition: “[Plaintiff's employment] was probably for a season because Mar-a-Lago is seasonal. I mean, I was there year round but a lot of people are seasonal, you know, because it's like snowbirds, you know, summertime comes and nobody wants to be down in south Florida...[The season is] probably from September or October to, you know, maybe May, I guess.” EXHIBIT T at 72. With the spa closed from Mother's Day to November 1, plaintiff could not have had a “summer job” and could not have worked at Mar-a-Lago until November 2000, at the earliest, when she was over 17 years old.

In sum, Plaintiff's claim in the Joinder Motion that she met Ghislaine Maxwell in 1999 when she was 15 years old is a false statement. Therefore, the January 2015 statement calls the allegations against her “untrue” was factually accurate.

2. The January 2015 statement accurately denied that Ms. Maxwell “regularly participate[d] in Epstein's sexual exploitation of minors” and that “the Government knows” such fact.

The January 2015 statement also accurately denied plaintiff's joinder motion allegation that “it became known to the government that Maxwell herself regularly participated in Epstein's sexual exploitation of minors, including Jane Doe #3.” EXHIBIT D at 3. Ms. Maxwell did not “regularly participate in in Epstein's sexual exploitation of minors” as confirmed by the lead Palm Beach Detective, Joseph Recarey. Det. Recarey confirmed that none of the alleged Epstein victims ever mentioned Ms. Maxwell's name, either in reports he reviewed or in interviews he conducted. None of the alleged victims said they had been “recruited,” paid or exploited by Ms. Maxwell. EXHIBIT GG at 10-11, 177, 180-82, 187-96, 241-42, 278. He verified that the twenty-

two page Palm Beach Police Department affidavit does not mention Ms. Maxwell's name once (*id.* at 177), and she was never considered a suspect and she was never mentioned in the grand jury testimony. *Id.* at 203. Ms. Maxwell was not seen coming or going from the house during any of the Palm Beach Police Department's surveillance of Epstein's home. *Id.* at 214-15. None of her property was seized from Epstein's home. *Id.* at 257. In sum, Det. Recarey denied that knowing anything "about Ghislaine Maxwell's sexual trafficking conduct." *Id.* at 278. He confirmed he has no knowledge that Ms. Maxwell sexually trafficking "anybody." *Id.* at 278-79. Likewise, he has no knowledge of Plaintiff's conduct that is subject of this lawsuit. *Id.* at 259-60. Plaintiff thus has uncovered no evidence that the "government" came to "know" that Maxwell participated in sexual exploitation of Jane Doe #3, i.e., Plaintiff. Plaintiff has not and cannot present clear and convincing evidence to demonstrate the falsity of Ms. Maxwell's denial.

3. The January 2015 statement accurately denied that "with [Ms. Maxwell's] assistance, [Epstein] converted [Plaintiff] into what is commonly referred to as a 'sex slave.'"

Plaintiff claimed in the joinder motion that Ms. Maxwell helped Epstein transform her into a "sex slave" as that term is "commonly" used, yet the incontrovertible evidence establishes the opposite. A "slave" as defined by Merriam-Webster is a "person held in servitude as the chattel of another." Oxford Dictionary defines "slave" as a "person who is the legal property of another and is forced to obey them." Common definitions of "sex slave" include a person who is confined and is raped, sexually abused or prostituted. *See* "Sex Slave," Free Dictionary, located at <http://www.thefreedictionary.com/sex+slave> (last visited Jan. 5, 2017) (underlining supplied). Plaintiff, however, was far from confined or the legal property of another.

Throughout 2000, 2001 and 2002, Plaintiff enjoyed complete freedom of movement and choice. She had a car and then a pickup truck she shared with Figueroa. EXHIBIT P at 67.. She traveled freely to and from multiple jobs working as a waitress, bird aviaries, veterinarian

hospital, Neiman Marcus, Oasis Outsourcing and Southeast Employee Management Company. EXHIBIT R. Plaintiff enrolled in school in June 2000 before she met Maxwell or Epstein and continued her enrollment throughout 2000, 2001 and until March 2002. EXHIBIT O. She worked at multiple restaurants and the animal hospital in 2002. EXHIBIT R. She came and went from her apartment, moved to a new apartment and then moved in with Figueroa's family. She held parties at her apartment with Figueroa and other friends. EXHIBIT Z. When something did not go well, she called the police and filed police reports, without mentioning anything about captivity, confinement or forced sexual exploitation or trafficking, much less "sex slavery." *Id.* and EXHIBIT AA. She had her own money, paid her rent, and bought a vehicle. To Figueroa, she seemed "excited" about meeting famous people and discussed it so much that he tuned it out. EXHIBIT P at 125-26. By any commonly understood definition of sex slavery, Plaintiff did not match the description.

Witness testimony and documentary evidence demonstrate the absence of substantial truth to Plaintiff's claim that Maxwell assisted Epstein in converting her into what is commonly referred to as a "sex slave." The January 2015 statement's denial of that claim cannot therefore be defamatory.

4. The January 2015 statement accurately reported that Plaintiff alleged "sexual relations" with Professor Dershowitz which he denied.

The January 2015 statement accurately reports that "now it is alleged that Alan Dershowitz [sic] is involved in having sexual relations with [Plaintiff], which he denies." The joinder motion made such a claim and Professor Dershowitz publicly and vehemently denied any such sexual contact. *See, e.g., Dershowitz Denies Sex Charge, JTA (Jan. 2, 2015) ("Dershowitz*

declared ‘totally, unequivocally and completely false’ allegations that he had sex with the former staffer for investor Jeffrey Epstein.”).³⁴

Professor Dershowitz has gone beyond a simple denial: he has sworn, repeatedly and in almost every conceivable forum, including the New York Times, the Wall Street Journal, and Good Morning America, that he never had any sexual contact with Plaintiff and never met her. As he set forth in this case in his Declaration in Support of Motion to Intervene, Plaintiff never mentioned his name during her weeklong 2011 interview with journalist Sharon Churcher. Doc.363. It was only after Churcher suggested to Plaintiff that she “must have” met Dershowitz because “we all know he’s a pedo, though we have no proof of that” that Plaintiff then included Dershowitz in her book manuscript, not as a perpetrator of hers, but as someone she had “met” while with Epstein. *Id.* The CVRA joinder motion more than three years later was the first time plaintiff publicized her remarkable claim that she had been sexually trafficked to Dershowitz on “numerous occasions” “while she was a minor,” in Florida, private planes, in New York, New Mexico, and the U.S. Virgin Islands. EXHIBIT D.

Dershowitz, in his own subsequent defamation action against plaintiff’s attorneys Edwards and Cassell, produced approximately 10,000 pages of documents capturing his travels during the 1999-2002 timeframe, none of which coincided with Plaintiff’s story. For example, Dershowitz demonstrated that the only time he visited Epstein’s home in the U.S. Virgin Islands he was accompanied by his wife and his 12 year old daughter. Plaintiff, on the other hand, produced no records demonstrating that any portion of her allegation against him is true. For example, she claimed one sexual encounter occurred on a private plane on which she traveled

³⁴http://www.jta.org/2015/01/02/news-opinion/united-states/dershowitz-denies-lawsuits-sex-charges?utm_source=twitterfeed&utm_medium=twitter&utm_campaign=jtafeed (last visited Jan. 5, 2017).

with Professor Dershowitz. EXHIBIT II at 85. None of the flight logs reveal a flight with the two of them as passengers. EXHIBIT BB. Another time, plaintiff claims, she and Epstein flew together to Boston and she engaged in sexual relations with Professor Dershowitz in the backseat of a limousine between the airport and his home with another female and Epstein next to them. EXHIBIT II at 110-15. No flight logs document any trip with Epstein and plaintiff to Boston and plaintiff cannot recall the other female in the car. EXHIBIT II at 113.

Professor Dershowitz has signed affidavits, provided sworn deposition testimony and sworn pleadings, offered to take a lie detector test, offered to waive the statute of limitations as to himself, and given countless broadcast and news interviews disclaiming any sexual contact with Plaintiff and calling her an outright “liar.”³⁵ The January 2015 statement recounting the allegation against him and his denial is substantially true.

5. The January 2015 statement accurately denied that Ms. Maxwell created and distributed child pornography and that the Government knows of and possesses such child pornography.

Plaintiff’s next assertion regarding Maxwell in the joinder motion was that “Maxwell also took numerous sexually explicit pictures of underage girls involved in sexual activities, including Jane Doe #3,” and that Maxwell “shared these photographs (which constituted child pornography under applicable federal laws) with Epstein.” EXHIBIT D at 4-5. Plaintiff continued: the “Government is apparently aware of, and in certain instances possesses some of these photographs.” *Id.* Yet again, the evidence demonstrates the falsity of Plaintiff’s claim.

Detective Recarey testified that none of Epstein’s alleged victims even mentioned Ms. Maxwell, much less claimed that she had taken naked photographs of them. EXHIBIT GG at 180-82, 187-96, 241-42, 278. Recarey also denied that any evidence belonging to Ms. Maxwell was

³⁵Perhaps most telling, Plaintiff and her phalanx of attorneys have never sued Mr. Dershowitz for his many vociferous attacks on her credibility.

seized from Epstein's home during the execution of the search warrant, which would include any "child pornography" reportedly created by her. *Id.* at 257. Detective Recarey who had entered Epstein's home in 2002 to install security cameras to catch a thief did not observe any "child pornography" within the home, including on Epstein's desk where Plaintiff alleges he kept such a nude photograph of herself. *Id.* at 289-90. And Epstein's housekeeper, Juan Alessi, swore that he "never saw any photographs of Virginia Roberts in Mr. Epstein's house," EXHIBIT HH at ¶ 17, contradicting Plaintiff's claims that nude photographs of her were prominently displayed throughout all of Epstein's homes.

No sexually explicit photographs of Plaintiff were ever produced in discovery in this case or subpoenaed by Plaintiff from any governmental agency. Plaintiff has presented no evidence the government "possesses" any such photographs or indeed ever became "aware of" them.

6. January 2015 statement accurately denied Maxwell acted as "madame" for Epstein to traffic Plaintiff to the rich and famous.

Finally, in the joinder motion, Plaintiff asserted that Ms. Maxwell had "facilitated" sexual abuse "by acting as a 'madame' for Epstein, thereby assisting in internationally trafficking Jane Doe #3 (and numerous other young girls) for sexual purposes." Plaintiff has utterly failed to substantiate her allegation.

Not a single "other young girl" made a claim that Maxwell, or even Epstein for that matter, trafficked them to a third-person for commercial sexual acts. Detective Recarey confirmed that he had no knowledge of Ghislaine Maxwell sexually trafficking anyone. EXHIBIT GG at 278-79. He also confirmed that not a single one of the alleged victims of Epstein ever claimed to have any sexual contact with any man other than Epstein, or that they were sent to another location to have sex with another man or to give a massage to another man. *Id.* at 300-02. None of the other alleged victims of Epstein ever claimed to have gone on his plane with him

or to have had sexual acts with him on his plane. *Id.* at 302-04. None claimed they had gone to New York with him and stayed in his residence. *Id.* at 304-05. Plaintiff, it appears, is the only alleged victim of Epstein who claims she was the subject of such trafficking, yet even she has retracted, amended, and withdrawn many of her allegations, thus rendering (by her own admission) such claim substantially untrue.

Foreign Presidents. Upon questioning under oath, Plaintiff admitted that she had never even met a “foreign president,” much less ever been sexually trafficked to one or to the multiple “foreign presidents” referenced in the joinder motion.

Q: The reference there to foreign presidents, do you see that?

A: Yes.

Q: You were sexually trafficked to foreign presidents?

A: No.

Q: So that’s not true, you were not sexually trafficked to foreign presidents?

A: I don’t know what foreign presidents you’re talking about.

Q: Have you ever been sexually trafficked to any foreign president?

[Objection interposed by Ms. McCawley; Special Master overruled]

A: I understand well-known prime ministers and other world leaders; as far as foreign presidents, I’m not too sure, I don’t know.

Q: Have you ever met any foreign presidents?

A: Foreign presidents as in overseas?

Q: Sure, okay, overseas.

A: No.

Q: Have you ever met any foreign presidents from countries not overseas such as Canada or Mexico?

A: No.

Q: So you were not sexually trafficked to any foreign presidents, is that correct?

A: As far as I know right now, yes.

Q: It's correct that you were not sexually trafficked to them, right?

A: You've asked me this three times and I'm telling you.

EXHIBIT II at 10-12. Indeed, Plaintiff became frustrated by what she perceived as the third time she was asked the question, each time denying that she had met a foreign president or been sexually trafficked to one, clearly indicating that she understood the question, had answered it in the negative and did not want to be re-asked the question again.³⁶ Notably, not a single "foreign president" is listed as a witness with knowledge of Plaintiff's claims in her Rule 26 disclosures.

"Well-known prime minister." Plaintiff also has failed to establish any evidence to support her fantastical claim that she was sexually trafficked to a "well-known prime minister." When questioned, she refused to disclose the identity of the prime minister, even with the protection of a protective order. EXHIBIT II at 12. She has not produced photographs of her with any well-known prime minister, nor any flight log showing a well-known prime minister on Epstein's airplane. She has not identified herself as being in any location with a well-known prime minister, nor the date of any such encounter. The only evidence that Plaintiff has ever been even in the company of a well-known prime minister is her uncorroborated word.

"World leaders." Likewise, when asked about "world leaders" to whom she was trafficked, Plaintiff referred vaguely to someone she was introduced to as a "prince."

Q: Other world leaders, what other world leaders were you sexually trafficked to?

[Objection interposed and overruled by Special Master]

A: Okay. Prince Andrew for one.

Q: Other than Prince Andrew?

³⁶Plaintiff and her counsel later devised a plan to just outright change these three answers through the errata sheet, claiming that Plaintiff had "misunderstood the question" and she had in fact been trafficked to such a president. EXHIBIT JJ. As her clear answers and frustration at the repeated nature of the questioning demonstrates, however, she had no trouble whatsoever understanding the question at the time.

A: There is another individual that I honestly do not know his name.

Q: What country is he from?

A: I'm not too sure, he spoke in a foreign—he did speak foreign tongue, he spoke English as well, but I'm not too sure where he was from?

Q: How do you know he is a world leader?

A: I was introduced to him as a prince.

...

Q: Did you – where were you when you met him?

A: On this occasion the South of France.

...

Q: Where in the South of France were you?

A: I don't know.

Q: Were you on a boat, were you in a house?

A: We were at a like a cabana, not cabana, like a resort, but it was a big party.

Q: Who was throwing the party?

A: I don't know. I was just brought there.

EXHIBIT II at 15-17. Indeed, this is almost the identical answer that Plaintiff later gave when questioned about what which “powerful businessmen” she had been sent to have sex with:

Q: Where were you sent to have sex with the owner of a large hotel chain by Ghislaine Maxwell?

A: I believe that was one time in France.

Q: I believe it was around the same time that Naomi Campbell had a birthday party.

A: Where did you have sex with the owner of a large hotel chain in France around the time of Naomi Campbell's birthday party?

A: In his own cabana townhouse thing. It was part of a hotel, but I wouldn't call it a hotel. . . .

EXHIBIT N at 203. In fact, Naomi Campbell's birthday is May 22, 1970. [WIKIPEDIA]. The flight logs do not show plaintiff traveling to France in May 2001 or May 2002. EXHIBIT BB at DR_0046, DR_0056. On May 22, 2002, for example, Epstein was in Russia.

In her joinder motion, Plaintiff made the additional claim that Epstein (not Maxwell) sexually trafficked her to "model scout" Jean Luc Brunel on numerous occasions and in numerous places, including "the South of France." EXHIBIT D at 5-6. The flight logs, however, demonstrate that Plaintiff was never in the "south of France," much less on multiple occasions. The one and only trip reflecting travel by Plaintiff to France was a trip on March 6, 2001 from a fueling stop in Canada to Paris, followed by a departure from Paris on March 8, 2001 to Granada. EXHIBIT BB at DR_000043; EXHIBIT CC at 107. Although there are other flights in which Epstein went to Nice in the south of France, Plaintiff is not on any of them and none are near Naomi Campbell's birthday on May 22.

Plaintiff's claim in her joinder motion about having been trafficked to other "prominent American politicians" and other world leaders have gone unsubstantiated and are patently incredible. Because these men are publicized to have been in the company of Epstein on at least one occasion, such was apparently sufficient for Plaintiff to claim she had been trafficked to them. For example, Plaintiff claimed at her deposition that these powerful men to whom she was trafficked included Marvin Minsky. EXHIBIT N at 204. Dr. Minsky, a world-renowned scholar and long-time professor at MIT, passed away in January 2016 at the age of 88.³⁷ At the time of his passing, he had been married to his wife, pediatrician Dr. Gloria Rudisch, since 1952 and had three children and four grandchildren. His name appears on one of Epstein's flight logs as having traveled with a large group of individuals, including plaintiff, from New Jersey to Santa Fe on

³⁷ <https://www.bostonglobe.com/metro/2016/01/25/marvin-minsky-dies-mit-professor-helped-found-field-artificial-intelligence/A8y6ey8S0QAao463Z2ooO/story.html>

March 29 and returning on March 31, 2001.³⁸ The other passengers included world-renowned philanthropist Dr. Henry Jarecki, now aged 83, also a long-time husband, famed academic and scholar, and famous philanthropist.³⁹

Plaintiff produced no evidence substantiating any of her fantastical claims that she had been trafficked by Epstein, or by Maxwell, to any of these men or any others. No witnesses vouched for seeing plaintiff in the company of politicians George Mitchell or Bill Richardson to whom plaintiff claims she was sent. She produced no photographs of herself with them. She had a journal where she claims she documented their names, but she claims she burned that journal in 2013. In May 2011, plaintiff inquired by email to journalist Sharon Churcher to “remind” her of the famous people to whom she was trafficked. Plaintiff has not supported her claims with clear and convincing evidence and thus, Ms. Maxwell’s denials and characterizations of these claims as “obvious lies” is not defamatory as a matter of law.

CONCLUSION

For the foregoing reasons, the Court should grant summary judgment in favor of Ms. Maxwell.

³⁸ Plaintiff claims, however, that she was trafficked to Dr. Minsky in the U.S. Virgin Islands.

³⁹ https://en.wikipedia.org/wiki/Henry_Jarecki

January 6, 2017.

Respectfully submitted,

/s/ Laura A. Menninger

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CERTIFICATE OF SERVICE

I certify that on January 6, 2017, I electronically served this *Memorandum in Support of Defendant's Motion for Summary Judgment* via ECF on the following:

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

-----X

**Declaration of Laura A. Menninger in Support of
Defendant's Motion For Summary Judgment**

I, Laura A. Menninger, declare as follows:

1. I am an attorney at law duly licensed in the State of New York and admitted to practice in the United States District Court for the Southern District of New York. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell in this action. I respectfully submit this Declaration in support of Ms. Maxwell's Motion for Summary Judgment.¹

2. Attached as Exhibit A is a true and correct copy of an article by Sharon Churcher entitled "Prince Andrew and the 17-year-old girl his sex offender flew to Britain to meet him," DAILY MAIL, dated March 2, 2011.

¹ At trial, defendant intends to produce either the custodian of record relevant to any disputed document or a certification in compliance with either Fed. R. Evid. P. 803 and/or 902. See Fed. R. Civ. P. 56(c). Apart from deposition testimony, the majority of non-deposition documents herein were either produced by plaintiff or obtained with releases signed by plaintiff.

3. Attached as Exhibit B is a true and correct copy of an article by Sharon Churcher entitled “Teenage girl recruited by paedophile Jeffrey Epstein reveals how she twice met Bill Clinton,” DAILY MAIL, dated March 5, 2011.

4. Attached as Exhibit C is a true and correct copy of a statement on behalf of Ms. Maxwell dated March 9, 2011.

5. Attached as Exhibit D (filed under seal) is a true and correct copy of the corrected Motion for Joinder, *Doe v. United States*, No. 08-80736-Civ-Marra/Johnson (S.D. Fla. Jan. 2, 2015).

6. Attached as Exhibit E is a true and correct copy of an Order Denying Motion to Join Under Rule 21, *Doe v. United States*, No. 08-80736-Civ-Marra/Johnson (S.D. Fla. Apr. 7, 2016).

7. Attached as Exhibit F is a true and correct copy of a statement on behalf of Ms. Maxwell dated January 2, 2015.

8. Attached as Exhibit G (filed under seal) are true and correct copies of excerpts from the November 18, 2016 deposition of Ross Gow, designated Confidential under the Protective Order.

9. Attached as Exhibit H (filed under seal) is a true and correct copy of Plaintiff’s Response to Second Request for Production and to Interrogatories and Requests for Admissions, dated July 1, 2016.

10. Attached as Exhibit I (filed under seal) is a true and correct copy of Plaintiff’s Supplemental Responses to to Interrogatory Nos. 6, 12 and 13, dated August 17, 2016, designated Confidential under the Protective Order.

11. Attached as Exhibit J (filed under seal) is a true and correct copy of the Declaration of Ghislaine Maxwell, dated January 6, 2017.

12. Attached as Exhibit K (filed under seal) is a true and correct copy of the Declaration of Philip Barden, dated January 6, 2017.

13. Attached as Exhibit L (filed under seal) are true and correct copies of excerpts from the June 23, 2016 deposition of James Austrich, designated Confidential under the Protective Order.

14. Attached as Exhibit M (filed under seal) is a true and correct copy of Plaintiff's passport application, dated January 12, 2001, designated Confidential under the Protective Order.

15. Attached as Exhibit N (filed under seal) are true and correct copies of excerpts from the May 3, 2016 deposition of Virginia Giuffre, designated Confidential under the Protective Order.

16. Attached as Exhibit O (filed under seal) are true and correct copies of Plaintiff's school records Bates stamped GM_00888 and GIUFFFREE004981-88 and designated Confidential under the Protective Order.

17. Attached as Exhibit P (filed under seal) are true and correct copies of excerpts from the June 24, 2016 deposition of Tony Figueroa, designated Confidential under the Protective Order.

18. Attached as Exhibit Q (filed under seal) are true and correct copies of excerpts from the November 14, 2016 deposition of Virginia Giuffre, designated Confidential under the Protective Order.

19. Attached as Exhibit R (filed under seal) is a true and correct copy of Plaintiff's Social Security records dated October 25, 2016, Bates stamped GIUFFRE009175, designated Confidential under the Protective Order.

20. Attached as Exhibit S (filed under seal) is a true and correct copy of Mar-A-Lago records, Bates stamped MAR-A-LAGO-0001 and MAR-A-LAGO-0161-0177.

21. Attached as Exhibit T (filed under seal) is a true and correct copies of excerpts from the May 20, 2016 deposition of Sky Roberts, designated Confidential under the Protective Order.

22. Attached as Exhibit U (filed under seal)) is a true and correct copy of the Mar-A-Lago employee handbook, dated October 28, 1995, Bates stamped MAR-A-LAGO-0178-0243.

23. Attached as Exhibit V (filed under seal) is a true and correct copy of the Mar-A-Lago advertisement, Bates stamped MAR-A-LAGO-0086.

24. Attached as Exhibit W (filed under seal) is a true and correct copy of Plaintiff's Courtyard Animal Hospital employment application, Bates stamped GIUFFRE009201-11, designated Confidential under the Protective Order.

25. Attached as Exhibit X(filed under seal) is a true and correct copy of the Royal Palm Beach Police Department Offense Report date, June 10, 2001, Bates stamped GM_00780-82.

26. Attached as Exhibit Y (filed under seal) is a true and correct copy of the Royal Palm Beach Police Department Probable Cause Affidavit date, November 19, 1999, Bates stamped GM_01223-28.

27. Attached as Exhibit Z (filed under seal) is a true and correct copy of the Royal Palm Beach Police Department Offense Report date, August 3, 2001, Bates stamped GM_00777-79.

28. Attached as Exhibit AA (filed under seal) is a true and correct copy of the Palm Beach County Sheriff's Offense Report date, June 02, 2002, Bates stamped GM_00748-79.

29. Attached as Exhibit BB (filed under seal) are true and correct copies of David Rodgers flight logs from November 1995 to May 2013, Bates stamped DR__0001-DR0107.

30. Attached as Exhibit CC (filed under seal) is a true and correct copy of excerpts from the June 3, 2016 deposition of David Rodgers, designated Confidential under the Protective Order.

31. Exhibit DD left intentionally blank.

32. Attached as Exhibit EE (filed under seal) is a true and correct copy of the Royal Palm Beach Police Citation Tracking Report date, June 19, 2002, Bates stamped GM_00776.

33. Attached as Exhibit FF (filed under seal) is a true and correct copy of the Palm Beach County Sheriff's Offense Report, Bates stamped GM_01202-28.

34. Attached as Exhibit GG (filed under seal) is a true and correct copies of excerpts from the June 21, 2016 deposition of Joseph Recarey, designated Confidential under the Protective Order.

35. Attached as Exhibit HH (filed under seal) is a true and correct copy of the Affidavit of Juan P. Alessi, dated January 13, 2016, Bates stamped GM_01197-1201.

36. Attached as Exhibit II (filed under seal) is a true and correct copy of excerpts from the Deposition of Virginia Giuffre taken in *Cassell v. Dershowitz*, on January 16, 2016, and designated as Confidential under the Protective Order.

37. Attached as Exhibit JJ (filed under seal) is a true and correct copy of Errata Sheet from the January 16, 2016 deposition of Virginia Giuffre taken in *Cassell v. Dershowitz*, dated February 11, 2016 and designated by Plaintiff as Confidential under the Protective Order.

38. Attached as Exhibit KK (filed under seal) is a true and correct copy of The Billionaire Playboys Club book manuscript, designated by Plaintiff as Confidential under the Protective Order.

39. Attached as Exhibit LL is a true and correct copy of the Victims Refuse Silence, Inc. Articles of Incorporation dated December 23, 2014, GIUFFRE001064-65.

40. Attached as Exhibit MM (filed under seal) is a true and correct copy of excerpts from the September 8, 2016 deposition of Brittany Henderson, designated Confidential under the Protective Order.

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

Executed on January 6, 2017.

s/ Laura A. Menninger
Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on January 6, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Motion for Summary Judgment* via ECF on the following:

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Nicole Simmons

EXHIBIT A

6/14/2016

Prince Andrew and girl, 17, who sex offender friend flew to Britain to meet him | Daily Mail Online

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Prince Andrew and the 17-year-old girl his sex offender friend flew to Britain to meet him

By SHARON CHURCHER

UPDATED: 08:02 EST, 2 March 2011

101

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- Virginia Roberts reveals she is 'Jane Doe 102' in Jeffrey Epstein case
- Mother-of-three spent four years as millionaire's personal masseuse
- She describes being flown across world to meet Prince Andrew
- Epstein trained her 'as a prostitute for him and his friends'

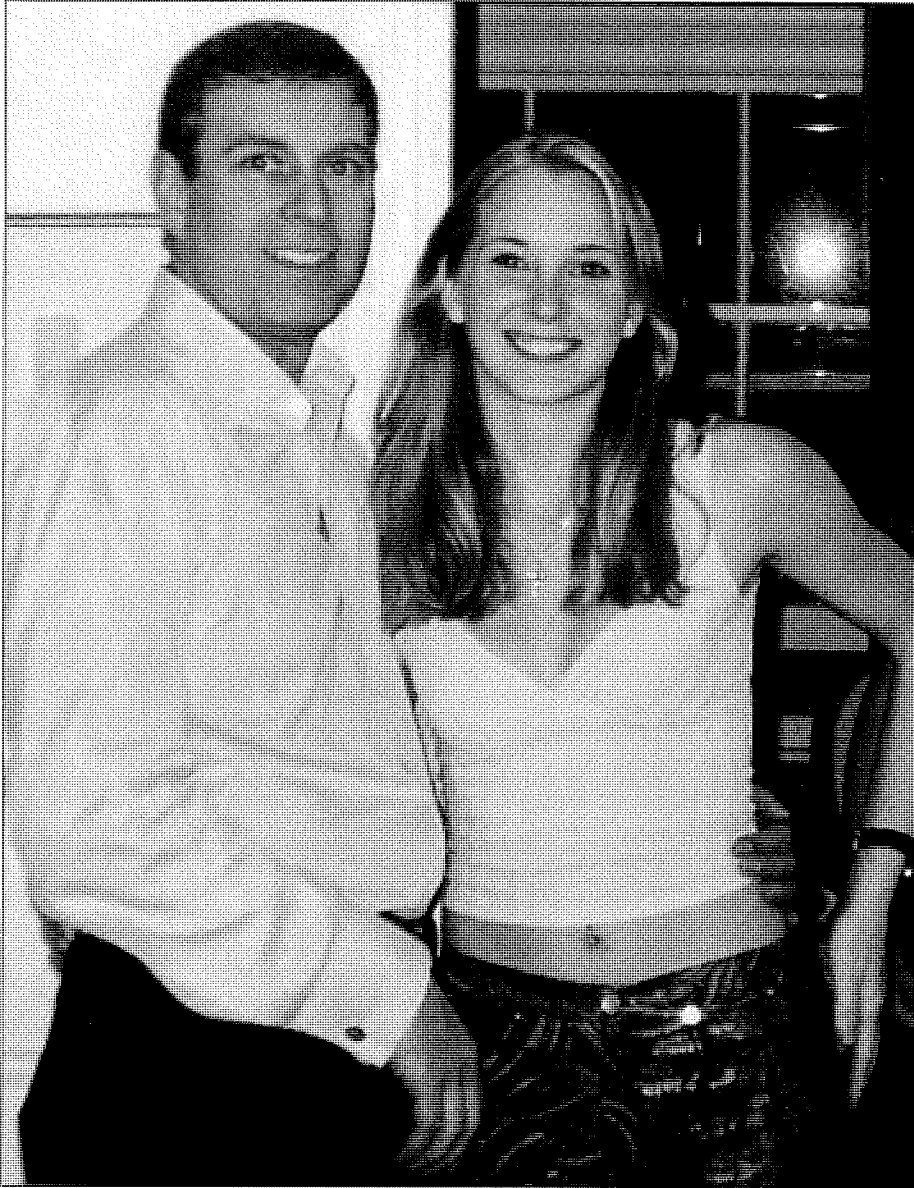
As the UK's special representative for international trade, the Duke of York holds an important position, requiring sound judgement and widespread respect.

But those qualities have been thrown into question since photographs of Prince Andrew with his billionaire financier friend Jeffrey Epstein, a convicted child-sex offender who was jailed for 18 months for soliciting underage prostitutes, appeared last weekend.

Today, however, even more serious doubts are cast on his suitability after a woman at the centre of the Epstein case revealed to The Mail on Sunday that she had, as a 17-year-old employed by Epstein, been flown across the world to be introduced to the Prince.

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First meeting: Prince Andrew puts his arms around 17-year-old Virginia, centre

On one of those occasions Virginia Roberts was subsequently paid \$15,000 (£9,400). Her shocking account of her four years as Epstein's personal masseuse is supported by court documents, an eyewitness, photographs and flight details of Epstein's private jets.

One picture, said to have been taken by Epstein during Andrew's first encounter with the girl in March 2001 and published today by The Mail on Sunday, shows the Prince with his arm around her waist.

This is not the first time the Duke of York's judgment and choice of associates have been questioned. He appears to relish the company of super-rich oil billionaires from the Middle East, North Africa and the former Soviet Union.

The peculiar sale of his former marital home to a Kazakh businessman for £15 million after it had languished unsold for five years at £12 million has never been satisfactorily explained.

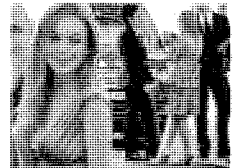
In the recent leak of American diplomatic cables it was revealed that he had criticised an official corruption investigation into the huge Al-Yamamah arms deal between Britain and Saudi Arabia, while he is also said to be close to Saif Al-Islam Gaddafi, son of the beleaguered Libyan president, and may have had a role in the early release of Lockerbie bomber Abdelbaset Al Megrahi.

But it is Andrew's friendship with Epstein, whom he has known since at least 2000, and with Epstein's confidante Ghislaine Maxwell, daughter of the late disgraced newspaper baron Robert Maxwell, that gives most concern.

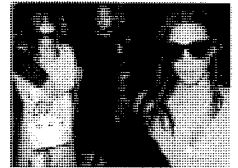
He was first seen with the pair on holiday in Thailand, and was pictured cavorting with Ghislaine at a Halloween fetish-themed party in

While on the streets, I slept with men for money. I was a paedophile's dream

Lindsay Lohan flashes her cleavage in a low-cut lilac number as she enjoys romantic day in Zurich with fiancé Egor Tarabasov
Lovely in lilac



Back in time to celebrate! Kim Kardashian and Kanye West arrive in LA on eve of daughter North's third birthday
Whirlwind 24-hour trip



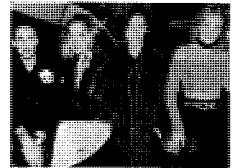
Bathing suit babes! Playboy vet Kendra Wilkinson shows off chest in one piece while celebrating 31st birthday with 'number one ho' in Arizona



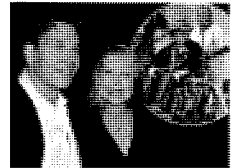
Sean Penn's son Hopper, 22, reveals his famous father wanted to name him 'Steak' due to his love of red meat
His mom Robin Wright wouldn't have gone for it



New romance for Ruby? Rose 'dating' businesswoman Harley Gusman after the pair were spotted cozying up on a date in Hollywood
Off the market?



Was Patrick Swayze a victim of domestic abuse? Wife denies claims she beat the Dirty Dancing star throughout their 34-year marriage - and even when he was dying



Advertisement

6/14/2016

Manhattan.

The photograph that appeared last weekend shows the prince strolling through Central Park with 58-year-old Epstein. Andrew was said to have spent four days at his New York mansion in December, when he was joined by other distinguished guests, including Woody Allen, at a dinner.

It is by no means the first New York soiree Andrew has attended as Epstein's guest.

A lengthy profile of the financier in Vanity Fair magazine some years ago reported that Andrew was a guest at a cocktail party thrown by Epstein and Maxwell packed with young Russian models. 'Some guests were horrified,' said the article's author, Vicky Ward.

It should not be forgotten that Epstein is a registered sex offender after recently completing his sentence for offences relating to child prostitution.

However, he avoided trial on more serious charges that carried a potential life sentence. And no one reading The Mail on Sunday's interview with the woman who was prepared to testify against him can be in any doubt of the seriousness of the charges.

Epstein, a Wall Street money manager who once counted Bill Clinton and Donald Trump among his friends, became the subject of an undercover investigation in 2005 after the stepmother of a 14-year old girl claimed she was paid \$200 (£125) to give him an 'erotic massage'.

The subsequent FBI probe uncovered at least 20 girls levelling sexual allegations against him. Eventually, Epstein struck a 'plea bargain' with prosecutors – a practice not permitted under British law – under which he was allowed to plead guilty to two relatively minor charges.

Police claim that his donations to politicians and his 'dream team' of influential lawyers deterred prosecutors from bringing more serious charges of sex-trafficking. The deal certainly kept the names of a lot of Epstein's famous friends out of an embarrassing court case.

However, an unusual part of the agreement was that Epstein's alleged victims were allowed to bring civil proceedings against him.

He has so far made 17 out-of-court settlements, and some cases are ongoing. One of these girls was to have been a key witness for the prosecution had the case gone to trial. She was just 15 years old when she was drawn into Epstein's exploitative world in 1998.

In her civil writ against him, under the pseudonym Jane Doe 102' she alleged that her duties included being 'sexually exploited by Epstein's adult male peers including royalty'.

Now, horrified by the evidence of Epstein and Andrew enjoying each other's company in New York, Jane Doe 102 has agreed to waive her anonymity and tell for the first time her deeply disturbing story.

Her real name is Virginia Roberts and she now lives in Australia, where she is a happily married mother of three.

Over the course of a week during which she spoke at length to The Mail on Sunday, she appeared sometimes vulnerable, and sometimes steely, but always quietly resolute and consistent.

Revisiting events from a past that she had hoped she had left behind, Virginia occasionally buried her face in her hands.

Some recollections – and, for reasons of taste, not all the details can be included here – caused her to flush with shame. 'I'm telling you things that even my husband didn't know,' she said.

Virginia, who has undergone counselling to try to come to terms with her past, is honest about her initiation into Epstein's depraved world.

She was a troubled teenager, whose slender figure, delicate complexion, hesitant voice and soulful blue eyes made her look young for her years.

Born in Sacramento, California, in August 1983, Virginia spent her early years on a small ranch on the West Coast of America.

This seemingly idyllic childhood ended when she was sexually molested by a man close to her family.

The fallout from that led to her parents temporarily splitting up. Blaming herself, Virginia began to get into trouble. Aged 11, she was sent to live with an aunt but repeatedly ran away.

Living on the streets, she was beaten up and slept with at least two older men in return for food. 'I was a paedophile's dream,' she says.

Three years later, she was reunited with her family and started a new life with her father who had moved to Palm Beach,

Florida, where he was maintenance manager at Donald Trump's country club, Mar-a-Lago.

Virginia got a part-time job as a changing room assistant – which is where, soon after her 15th birthday, she met Ghislaine Maxwell, who invited her to work as Epstein's personal masseuse.

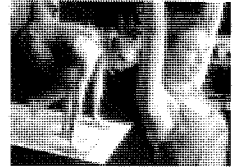
'I was wearing my uniform – a white miniskirt and a skin-tight white polo top – when I was approached by Ghislaine,' Virginia says.

'I told her I wanted to become a masseuse and she said she worked for a very wealthy gentleman who was looking for a travelling masseuse.

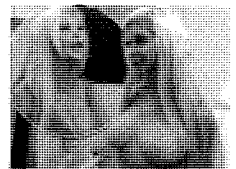
I'd get training and be paid well.' Virginia's father gave his blessing, believing his daughter was being handed the opportunity to learn a skill and to work for a wealthy and respectable employer.

He drove her to Epstein's pink mansion on the Palm Beach waterfront – he also owns a nine-storey home in New York, the city's biggest private residence; a 7,500-acre ranch called 'Zorro' in New

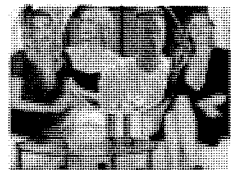
'Need a tight tush': LeAnn Rimes illustrates how to get a firm 'booty' as she does yoga in skimpy tank top and leggings
Exercise tips



'I want them really big!' Blonde bombshell begs doctors to make her 1,000cc implants – even after they insist her enhanced breasts are 'perfect'
On Botched



'It's my fourth favorite reality show! Jessica Alba and Kate Hudson are mean girls as Chris Martin plays for laughs in Sara and Erin Foster's Barely Famous



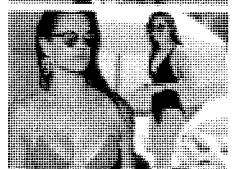
'He's turned into an absolute jerk:' Former Celebrity Apprentice star Vivica A. Fox slams Donald Trump... but says he's not a racist
She's no longer a fan



'I don't see a dark past anymore': Paris Jackson reveals tattoos have helped cover her 'scars and self-hatred' in moving Instagram post



How the season's hottest beach babes including Hailey Steinfeld and Kendall Jenner are embracing jewelry at the seashore
Chic on the beach



This old thing! Duchess of Cambridge recycles a TEN-year-old brocade coat as she plants a tree at garden party
From the back of her wardrobe



EXCLUSIVE: Alexa Curtin, daughter of Real Housewives star Lynne, is charged with drug possession two months after accusing O.C. deputy sheriff of raping her during a traffic stop



'I told my mom she's a grandma': Maria Menounos shared excitement about her frozen embryos in poignant IVF interview... given before negative pregnancy test



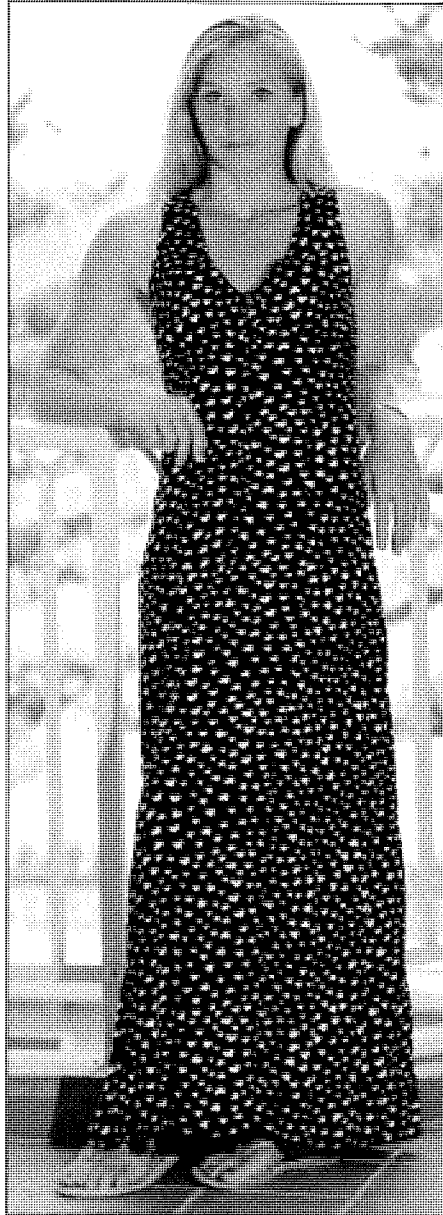
Gene Simmons' daughter Sophie says she was told she was 'not small enough' to be a model and reveals her mom taught her to love her shape



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Mexico and Little Saint James, a private 70-acre atoll in the US Virgin Islands.



A new life: Virginia, now a mother-of-three, in Australia

Virginia says: 'Ghislaine said I was to start immediately and that someone would drive me home.

My father left and I was told to go upstairs.' She was led by another woman through Epstein's bedroom into a massage room where he lay face down naked on a table.

He started to interview Virginia. This was unconventional, but Virginia had no suspicions. Presumably, she thought, this was how the wealthy conducted their business.

Epstein elicited the information that Virginia had been a runaway, and was no longer a virgin.

Virginia was then told to start massaging Epstein, under the instructions of the woman who had shown her in. The massage quickly developed into a sexual encounter.

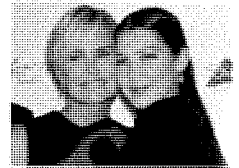
Virginia was uncomfortable, but reluctant to deny such important people. 'My face was red with embarrassment,' she says. 'But I felt under immense pressure to please them.

The whole time it was going on, they were promising me the world, that I'd travel with Jeffrey on his private jet and have a well-paid profession.' Afterwards, she was given two \$100 bills and told to return the next day.

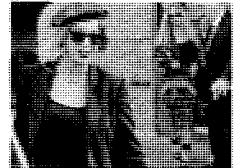
That was the beginning of the four years she spent with Epstein.

For three of those years, she was under Florida's age of consent, which is 18.

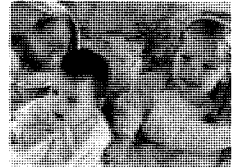
'I'd cry because there was nothing I could do to help': Bella Hadid pens emotional note about her mother Yolanda's Lyme disease battle and shares the impact of her own struggle



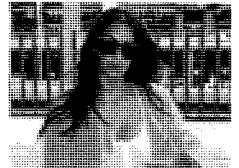
Has the Queen Bey lost her sting? Beyonce steps out in two questionable outfits as she recycles Super Bowl Reformation look. She is still a trailblazer.



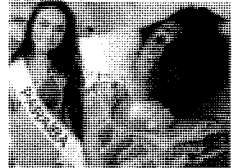
Jenna Bush Hager shares somber message about motherhood as she reveals her daughter was baptized only hours before Orlando shooting



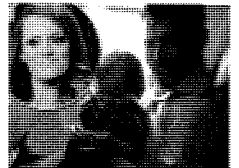
Time for Kardashian klass! From 'bloop' to 'ratchet'... Kim schools fans in how to talk like a true-blooded member of the family. How to be like them



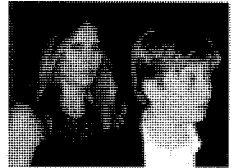
Brazilian Miss Bum Bum model reveals she is paralysed from the waist down after throwing herself from a fourth floor window in suicide attempt



Southern Charm stars claim Kathryn Dennis failed drug test in custody battle with wealthy drug-shamed former politician Thomas Ravenel as he takes their kids to NYC



Mini-me Barron joins parents Donald Trump and Melania at The Polo Bar for dinner the night before his 70th birthday (and Secret Service chauffeurs them the one block walk home)



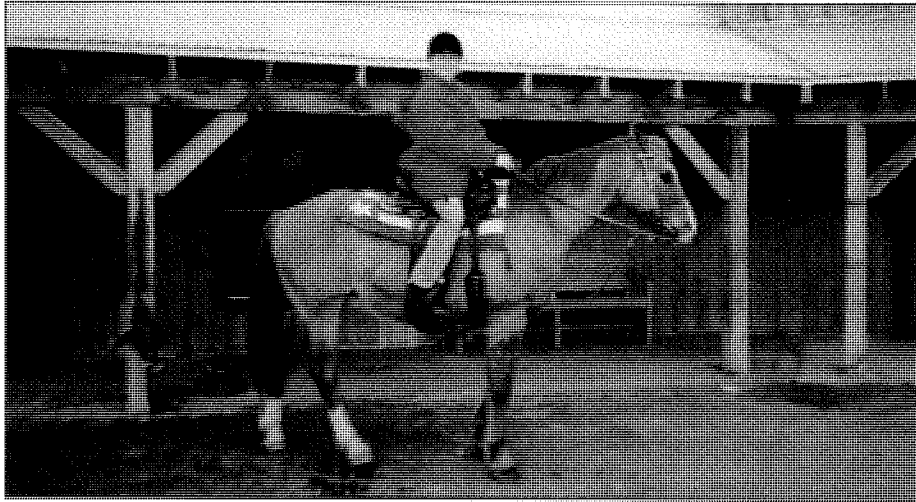
Lord of the manor! Scott Disick views \$2.8million property in Beverly Hills as he hunts for a house to fix up and sell. He is 33



Peek-a-boob! Heidi Klum flashes cleavage

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Troubled teenager: Virginia on the billionaire's Zorro ranch in New Mexico in 2001

Virginia was fascinated by his life story: the son of a humble New York City parks worker, he was a teacher before becoming a Wall Street broker and friends with the upper echelons of the political, financial and academic establishment.

As a confused teenager, Virginia easily fell into the practice of sexually gratifying him for money. He guaranteed her a minimum of \$200 each time she gave him what he called an 'erotic massage.'

Virginia said: 'I would always receive the money immediately. He would give me the cash from a wad he carried in a black duffel bag or an assistant paid me.

'And, because of the way Epstein had warped her sensibilities, every time she took the cash, Virginia felt even more indebted to him. Secretly, he was also preparing her for an even more disturbing role.

'Basically, I was training to be a prostitute for him and his friends who shared his interest in young girls,' she says: 'After about two years, he started to ask me to "entertain" his friends.'

It started when Epstein called Virginia at the Palm Beach apartment he had rented for her.

She recalls: 'He said, "I've got a good friend and I need you to fly to the island to entertain him, massage him and make him feel how you make me feel."

He didn't spell out what I had to do. He didn't have to. 'He'd trained me to do whatever a man wanted. I was shocked but I told myself he was sharing me around because he trusted me and I was special.

I was worried, but I would do anything to keep Jeffrey happy and to keep my place as his number one girl.

He would keep telling me how lucky I was with the life I was leading and the money I was making. It was easy to fall into his grasp.

'The way it usually worked was I'd be sent to meet a man on the private island Jeffrey owned in the Caribbean, or at his ranch in New Mexico, which was really isolated.' She was 'given' to men ranging in age from their 40s to their 60s.

They included a well-known businessman (whose pregnant wife was asleep in the next room), a world-renowned scientist, a respected liberal politician and a foreign head of state.

None appeared to think the arrangement was unusual. Virginia says there were many other girls in Epstein's circle and that she was paid extra money to help recruit them.

'They would lounge around the Palm Beach house, the ranch or the island, nude or topless,' she says. 'But I was one of the very few he trusted as "special" and chosen to "entertain" his friends.'

Virginia took the sedative Xanax to detach herself from sordid reality. 'It was an escape drug,' she says. 'It made me calm and helped me forget about what I had to do. I was up to eight pills a day.'

Epstein had no objection to Virginia's use of prescription drugs, no doubt recognising that they made her even more malleable. 'I didn't want to go back to the life I'd had before' she says.

'That made me totally obedient.' Despite the fact that Epstein was, essentially, her pimp, this life now seemed normal to Virginia. 'I felt that he and Ghislaine really cared for me,' she said.

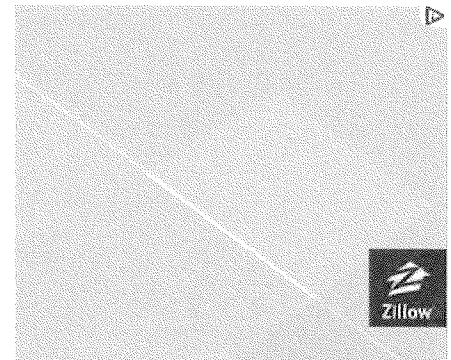
'We'd do family things, like watch Sex And The City and eat popcorn. 'A lot of it was very glamorous. I met famous friends of his such as Al Gore and Heidi Klum and Naomi Campbell. He introduced me as his "travelling masseuse."

Some people mistook me for his daughter. 'When we were in New York or Palm Beach, Ghislaine and I would shop all day.

as she leaves her blouse undone across her chest during NYC outing with her children Mom-o-four



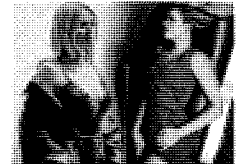
She's almost as tall as her mom! Courteney Cox's daughter Coco Arquette wears high heels and polka dot dress for her 12th birthday at Nobu



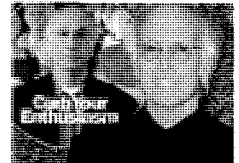
'It's hard on me': Liev Schreiber talks struggle of working in LA while Naomi Watts and their two kids are in NYC as he sits down with Ellen He misses them



'I was too big': Khloe Kardashian reveals stylists refused to work with her before she lost 40lbs as she wows in stunning natural shoot for Harper's Bazaar



Curb Your Enthusiasm is back! Larry David's beloved comedy series will return for a ninth season The beloved HBO comedy series



Super-sized diamond Her Majesty calls 'Granny's Chips' and the solitaire seed that grew into a flower: Queen's brooches and earrings have a glittering history



Sporty! Channing Tatum wears a backward baseball cap and matching vest as he leaves NYC hotel The Magic Mike star was hard to miss



Rollin' and strollin'! Chilled Bobby Cannavale gets behind the wheels of baby son Rocco's classy ride as he runs errands Star of HBO's Vinyl



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Jeffrey bought me jewellery – diamonds were his favourite – and wonderful furniture. He was paying me very well because I'd give him sex whenever he wanted it.'

She was, she says, delighted when Epstein invited her to accompany him on a six-week trip in 2001.

'He said we'd be going to Europe and North Africa to meet architects and interior decorators because he wanted to redo his New Mexico house.

I threw my arms around him and gave him a peck on the cheek.' They flew to Paris, then Spain, then Tangier.

Finally, they went to London. 'After we landed, we drove straight to Ghislaine's house,' says Virginia. 'I was given a small upstairs bedroom. The following morning, Ghislaine came in.

She was chirpy and jumped on the bed saying, "Get up, sleepyhead. You've got a big day. We've got to go shopping. You need a dress as you're going to dance with a Prince tonight."

'She said I needed to be "smiley" and bubbly because he was the Queen's son.

Ghislaine and I went to Burberry, where she bought me a £5,000 bag, and to a few other designer stores where we bought a couple of dresses, a pair of embroidered jeans and a pink singlet, perfume and make-up.

We got back to Ghislaine's house at around 4pm and I ran straight upstairs to shower and dress.

When I went downstairs, Ghislaine and Jeffrey were in the lounge. There was a knock at the door. Ghislaine led Andrew in and we kissed each other on the cheek. 'Ghislaine served tea from a porcelain pot and biscuits. She knew Sarah Ferguson and they talked fondly about Andrew's daughters.

Then Ghislaine asked Andrew how old he thought I was and he guessed 17 and they all laughed. Ghislaine made a joke that I was getting too old for Jeffrey.

She said, "He'll soon have to trade her in." It was widely known that he liked young girls.' The four of them went out to dinner and on to Tramp nightclub where, she says, Andrew danced with her.

'After about an hour-and-a-half, we drove back to Ghislaine's.

All of us went upstairs and I asked Jeffrey to snap a picture of me with the Prince. I wanted something to show my Mom. Ghislaine and Jeffrey left us after that, and later Andrew left.

'In the morning, Ghislaine said, "You did well. He had fun". We flew straight back to the States.' The Mail on Sunday has confirmed that the tycoon's jet flew to Paris on March 6, 2001, continuing to Granada, Tangier and London, before returning to New York.

On the last leg of the trip, Virginia was paid about \$15,000 (£9,400) by Epstein. 'It was amazing money, more than I'd ever made on a trip with him before.

He didn't say there was any special reason, but I felt like I'd done everything he wanted. He was very pleased.'

There is no suggestion that there was any sexual contact between Virginia and Andrew, or that Andrew knew that Epstein paid her to have sex with his friends.

However, the Prince must have been aware of Epstein's conviction when he stayed with him in New York in December.

Virginia says she met Andrew for a second time around Easter 2001 at Epstein's Manhattan mansion.

'When I got to the mansion, I was told, "Get ready. You are meeting someone in the office" – which is what they called the library. Andrew was sitting there in a big leather armchair.

Ghislaine had just given him a present, a big toy that was his Spitting Image puppet. 'He was smiling ear-to-ear. He looked like a kid whose parents were taking him to Disney World.

A beautiful girl called Johanna Sjöberg who worked for Jeffrey was sitting on Andrew's knee. Ghislaine guided me over to Andrew and I think he recognised me, though I don't know if he remembered my name.



Counselling: Virginia at her mother's home at Palm Beach in 1998

I took eight pills a day to help me forget what I had to do. It made me calm.

'I'm dating a separated married man.' Bethenny Frankel reveals she went to high school with wife of new boyfriend Dennis Shields
Skinny Girl founder

Get in there! Prince Harry and Zara Tindall can't contain their excitement as they watch their horses gallop to victory at Royal Ascot

'This isn't about you and your fake a** kiss for publicity': Madonna is slammed for her 'self-promoting' tweets following Orlando massacre

Jason Momoa's mini-me! Game of Thrones hunk enjoys family outing with cutie clone Nakoa-Wolf
Seven-year-old's mom is Lisa Bonet

Craving a little Mexican! Rob Kardashian's pregnant fiancée Blac Chyna digs into a bowl of tortilla soup during Snapchat video

Another Bachelor baby! Peyton and Chris Lambton are 'thrilled' to be expecting their first child after four years of marriage
The two wed in 2012

Lil Wayne 'guzzled three bottles of cough syrup mix lean' before suffering TWO seizures...as rapper now 'stable and in good spirits'

Cowgirl chic! Alessandra Ambrosio shows off toned legs with mini skirt as the stunner goes for a denim-on-denim look
Victoria's Secret Angel

Madonna and Guy Ritchie on brink of deal over custody of their 15-year-old son Rocco as judge agrees to call off showdown court hearing for more talks

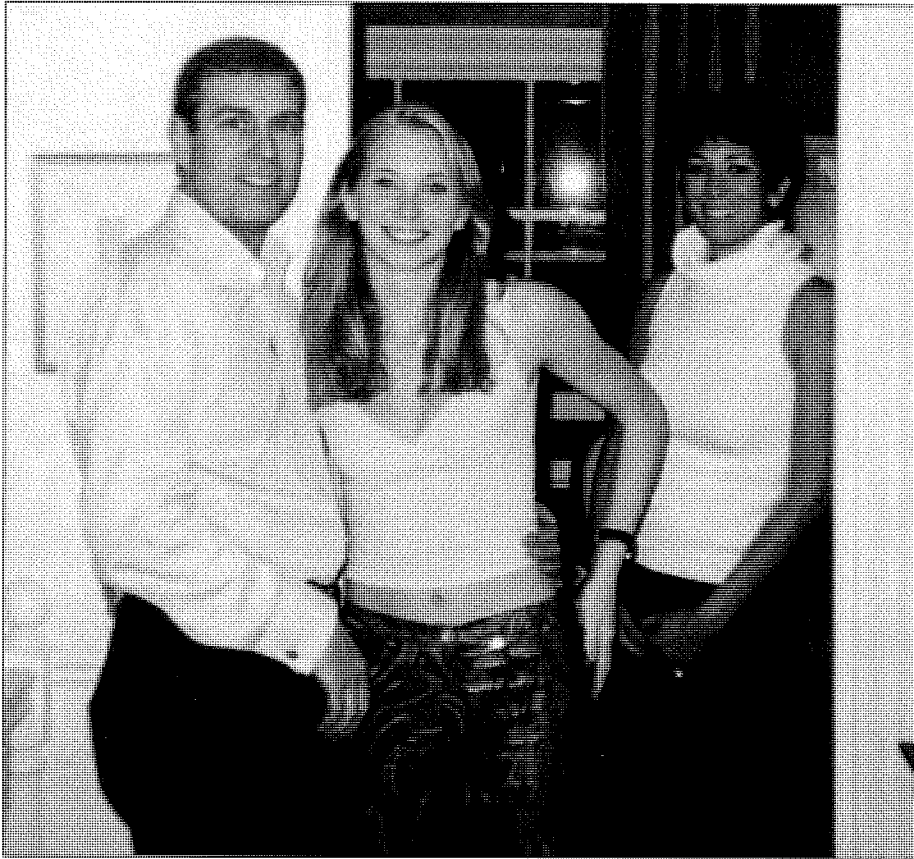
Gillian Anderson looks demure in sophisticated navy knee-length dress as she attends star studded charity gala
On behalf of Action on Addiction

Charlie Sheen cuts a casual figure while out and about in Stockholm... After becoming the new face



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Organiser: Ghislaine Maxwell looks on as Andrew put his arm around Virginia. Robert Maxwell's daughter invited her to work as Epstein's personal masseuse soon after her 15th birthday

We kissed on the cheek and Ghislaine placed me on his other knee.' Johanna spoke to The Mail on Sunday three years ago about this incident, which took place when she was 21.

She said: 'Ghislaine put the puppet's hand on Virginia's breast, then Andrew put his hand on my breast. It was a great joke. Everybody laughed.' After this, Virginia was paid, by Epstein, around \$400 (£250).'

She met Andrew for the third and final time on Epstein's Caribbean island, Little Saint James. Virginia was never under the British legal age of consent when she met Andrew. She was 17 during the first two encounters and 18 at the third.

By now, however, Epstein, had started to hint that she was getting 'too old' for him.

But during one trip to the island, Epstein and Ghislaine made their most astonishing proposition, and one which repulsed her. 'They said Jeffrey wanted me to have his child,' she says.

'They said I was part of their family and I was beautiful, young, loyal and nurturing and would be a great mother.

They said I would have to sign a contract relinquishing rights to the child and consenting to Jeffrey having as many relationships as he liked. In return I would have my own mansion in Palm Beach and a large monthly payment, a percentage of his income.'

This, finally, was a wake-up call to Virginia and she began to see the way in which she had been groomed.

'It was a smack in the face,' she says. 'I finally realised this wasn't ever going to be a real relationship but I knew if I refused, I'd be thrown back on the streets. So I said, "I'm too young. I want to get my massage credentials, then maybe we'll do it".'

The tycoon took her at her word and, for her 19th birthday in August 2002, flew her to Thailand where he enrolled her in a massage course.

Shortly after arriving there, she met an Australian martial arts expert called Robert. They fell in love and, just ten days later, married in a Buddhist ceremony.

'I called Jeffrey and told him I'd fallen madly in love,' Virginia says. 'I was hoping he'd be delighted. But he said, "Have a nice life," and hung up on me.' The couple now have two sons, aged five and four, and a daughter who recently turned one.

'The first few months after I married Robert were the worst,' she says. 'I couldn't bring myself to tell him much. No man wants to know his wife has been traded out.

'I felt very alone. I was having panic attacks and seeing a psychiatrist and was on anti-depressants.

'Virginia was beginning to put her Epstein days behind her when, three years ago, she was phoned by the FBI.

of condom brand Lelo Hex



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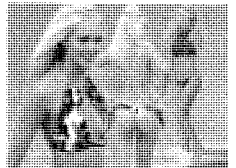
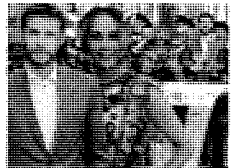
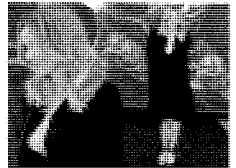
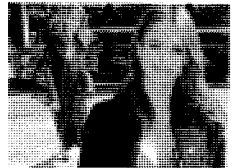
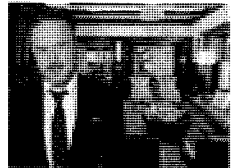
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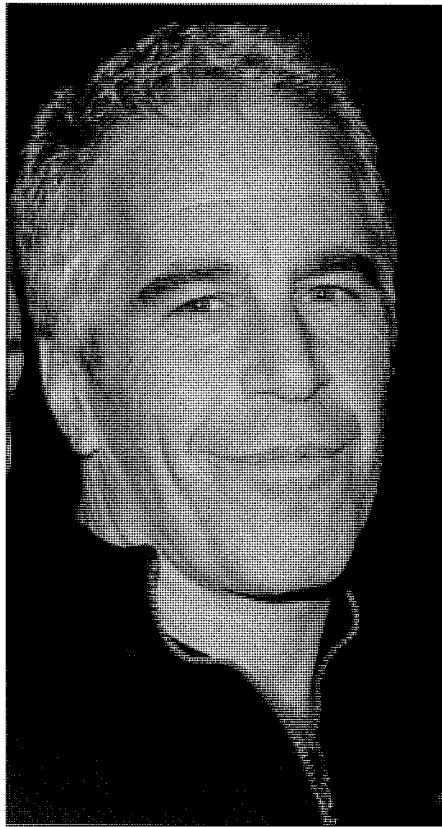
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'They said they had found photos of me at Jeffrey's Palm Beach house,' she says. '[Epstein had] hidden cameras watching me the entire time even when I was in the bathroom. I was so embarrassed.'

'I told the FBI that my true purpose was sexual. They told me everything he did was illegal because I was under age.' (The age of consent in Florida is 18).

'They said that if it had to go to trial, they'd need me because I'd lived with him and that made me a key witness. I was very afraid, because he had so much power, but eventually I agreed to testify.'

I was glad he'd finally been found out. He shouldn't be hurting other girls. Following Epstein's arrest, investigators are believed to have found a list of men's names on his computer and asked him whether they had been 'treated' to sexual encounters with his menage of minors.



Conviction: Jeffrey Epstein

'He took the Fifth Amendment, refusing to answer, indicating that if he were to answer the question, it could be incriminating,' a source told The Mail on Sunday.

Epstein struck a deal resulting in what commentators characterised as a 'slap on the wrist' for him, and ended up serving 13 months of his sentence, much of it in a liberal work-release programme. Lawyer Brad Edwards, who represented several of Epstein's victims, said: 'Rather than punish him the way they would an average Joe, they sent a clear message that with enough money and power and influence, the system can be bought.'

Virginia was spared her the humiliation of having to go before a jury, and has kept her feelings bottled up until last weekend's photograph of Andrew with Epstein triggered distressing memories.

Virginia says: 'I am appalled. To me, it's saying, "We are above the law." But Jeffrey is a monster.'

Last night, neither Epstein, Ghislaine Maxwell nor Prince Andrew would comment on Virginia's story.

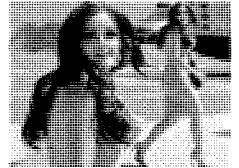
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Remembering his pal

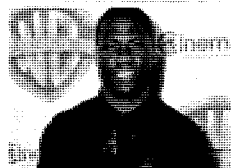


Bargain shopper! Drew Barrymore sports colorful silk jacket as she loads up a trolley with knick-knacks at flea market
She's a mom-of-two

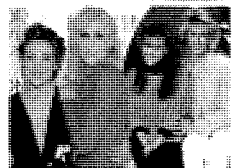
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Catching up



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Sizzling Katie Holmes gives a rare glimpse at her sultry side as she poses nude in gorgeous throwback snaps from jewelry campaign
She is 37



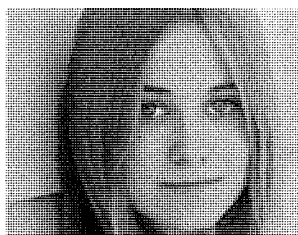
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Teenage girl recruited by paedophile Jeffrey Epstein reveals how she twice met Bill Clinton

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'.



Claims: Virginia Roberts 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 Virginia Roberts 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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Epstein's Girl Friday

<http://www.dailymail.co.uk/news/article-1363452/Bill-Clinton-15-year-old-masseur-I-met-twice-claims-Epsteins-girl.html>

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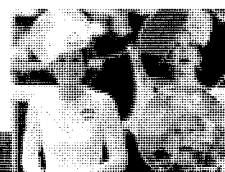


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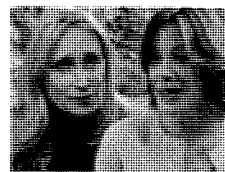
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diet' did trick



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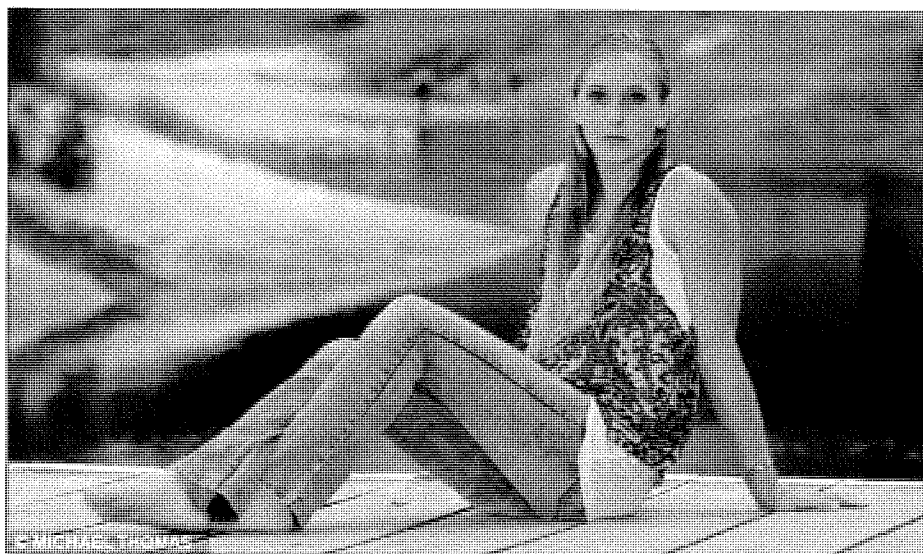
'She'd always wanted to fly and Jeffrey paid for her to take lessons, and I remember she was very excited because she got her licence around the first year we met.

'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.



Speaking out: Virginia, now aged 28, 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. Emmy Talyer, 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 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 Proserpi.

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

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

'Was Proserpi 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 Proserpi'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.

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

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© AFP/Getty Images

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

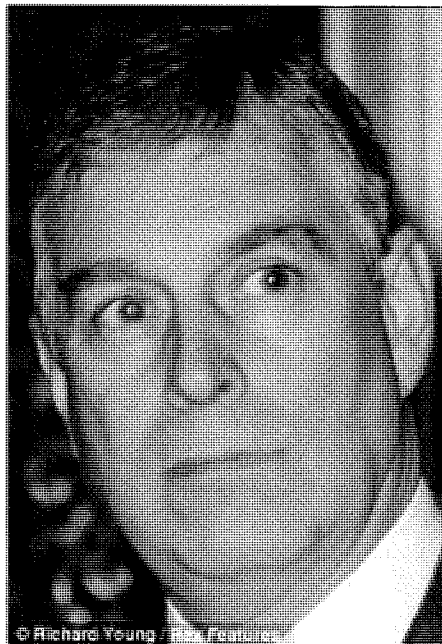
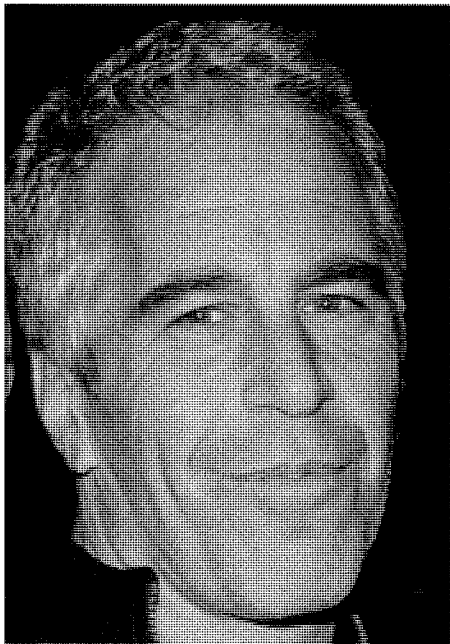
Last summer, the Gores abruptly announced that they were ending their supposedly fairytale marriage and, just weeks later, it emerged that Mr Gore – the famously sanctimonious global-warming disciple – had been accused of trying to force sex on a woman with whom he had booked a therapeutic massage at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



© 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.'

'We just want them to have a normal life': Blake Lively reveals her parenthood plans now that baby no.2 is on its way and why she fell in love with Ryan Reynolds



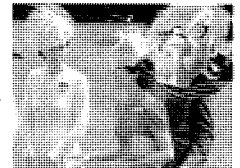
Back to work! Miley Cyrus and Liam Hemsworth temporarily go their separate ways... after very public dinner date in NYC



Ivanka Trump shares morning snap of baby Theo watching her get ready as she admits in that she wakes up at 5:30am and goes to work with her hair wet



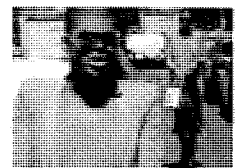
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Epstein's many Hollywood pals include Matt Groening, creator of The Simpsons.

'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.



'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 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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show - but admits the presidential hopeful wasn't going to come on anyway



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Grieving Adam Levine is pictured playing golf in first outing since Christina Grimmie's death... after offering to pay for the Voice star's funeral



Does North West have her own glam squad? Kim Kardashian 'hires daughter \$5k a week team including hairstylist and manicurist'



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Statement on Behalf of Ghislaine Maxwell

BY DEVONSHIRES SOLICITORS, PRNE
WEDNESDAY, MARCH 9, 2011

LONDON, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her that have appeared recently in the media. These allegations are all entirely false.

It is unacceptable that letters sent by Ms Maxwell's legal representatives to certain newspapers pointing out the truth and asking for the allegations to be withdrawn have simply been ignored.

In the circumstances, Ms Maxwell is now proceeding to take legal action against those newspapers.

"I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get in the way of a good story." However, the allegations made against me are abhorrent and entirely untrue and I ask that they stop," said Ghislaine Maxwell.

"A number of newspapers have shown a complete lack of accuracy in their reporting of this story and a failure to carry out the most elementary investigation or any real due diligence. I am now taking action to clear my name," she said.

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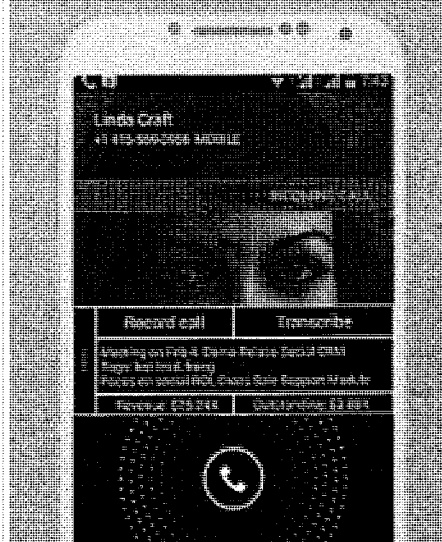
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SOUTHERN DISTRICT OF FLORIDA**

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES
_____ /

**JANE DOE #3 AND JANE DOE #4's CORRECTED MOTION PURSUANT TO RULE 21
FOR JOINDER IN ACTION**

COME NOW Jane Doe #3 and Jane Doe #4 (also referred to as "the new victims"), by and through undersigned counsel, to file this motion pursuant to Federal Rule of Civil Procedure 21 to join this action, on the condition that they not re-litigate any issues already litigated by Jane Doe #1 and Jane Doe #2 (also referred to as "the current victims"). The new victims have suffered the same violations of their rights under the Crime Victims' Rights Act (CVRA) as the current victims. Accordingly, they desire to join in this action to vindicate their rights as well. Because the new victims will not re-litigate any issues previously litigated by the current victims (and because they are represented by the same legal counsel as the current victims), the Government will not be prejudiced if the Court grants the motion. The Court may "at any time" add new parties to the action, Fed. R. Civ. P. 21. Accordingly, the Court should grant the motion.¹

FACTUAL BACKGROUND

¹ As minor victims of sexual offenses, Jane Doe #3 and Jane Doe #4 desire to proceed by way of pseudonym for the same reasons that Jane Doe #1 and Jane Doe #2 proceeded in this fashion. Counsel for the new victims have made their true identities known to the Government.

As the Court is aware, more than six years ago, Jane Doe #1 filed the present action against the Government, alleging a violation of her rights under the CVRA, 18 U.S.C. § 3771. DE1. She alleged that Jeffrey Epstein had sexually abused her and that the United States had entered into a secret non-prosecution agreement (NPA) regarding those crimes in violation of her rights. At the first court hearing on the case, the Court allowed Jane Doe #2 to also join the action. Both Jane Doe #1 and Jane Doe #2 specifically argued that the government had failed to protect their CVRA rights (inter alia) to confer, to reasonable notice, and to be treated with fairness. In response, the Government argued that the CVRA rights did not apply to Jane Doe #1 and Jane Doe #2 because no federal charges had ever been filed against Jeffrey Epstein.

The Court has firmly rejected the United States' position. In a detailed ruling, the Court concluded that the CVRA extended rights to Jane Doe #1 and Jane Doe #2 even though federal charges were never filed. DE 189. The Court explained that because the NPA barred prosecution of crimes committed against them by Epstein, they had "standing" to assert violations of the CVRA rights. *Id.* The Court deferred ruling on whether the two victims would be entitled to relief, pending development of a fuller evidentiary record. *Id.*

Two other victims, who are in many respects similarly situated to the current victims, now wish to join this action. The new victims joining at this stage will not cause any delay and their joinder in this case is the most expeditious manner in which to pursue their rights. Because the background regarding their abuse is relevant to the Court's assessment of whether to allow them to join, their circumstances are recounted here briefly.

Jane Doe #3's Circumstances

As with Jane Doe #1 and Jane Doe #2, Jane Doe #3 was repeatedly sexually abused by Epstein. The Government then concealed from Jane Doe #3 the existence of its NPA from Jane Doe #3, in violation of her rights under the CVRA. If allowed to join this action, Jane Doe #3 would prove the following:

In 1999, Jane Doe #3 was approached by Ghislaine Maxwell, one of the main women whom Epstein used to procure under-aged girls for sexual activities and a primary co-conspirator in his sexual abuse and sex trafficking scheme. In fact, it became known to the government that Maxwell herself regularly participated in Epstein's sexual exploitation of minors, including Jane Doe #3. Maxwell persuaded Jane Doe #3 (who was then fifteen years old) to come to Epstein's mansion in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children (including Jane Doe #1 and Jane Doe #2). When Jane Doe #3 began giving Epstein a "massage," Epstein and Maxwell turned it into a sexual encounter, as they had done with many other victims. Epstein then became enamored with Jane Doe #3, and with the assistance of Maxwell converted her into what is commonly referred to as a "sex slave." Epstein kept Jane Doe #3 as his sex slave from about 1999 through 2002, when she managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years. From 1999 through 2002, Epstein frequently sexually abused Jane Doe #3, not only in West Palm Beach, but also in New York, New Mexico, the U.S. Virgin Islands, in international airspace on his Epstein's private planes, and elsewhere.

Epstein also sexually trafficked the then-minor Jane Doe, making her available for sex to politically-connected and financially-powerful people. Epstein's purposes in "lending" Jane Doe (along with other young girls) to such powerful people were to ingratiate himself with them for

business, personal, political, and financial gain, as well as to obtain potential blackmail information.

One such powerful individual that Epstein forced then-minor Jane Doe #3 to have sexual relations with was former Harvard Law Professor Alan Dershowitz, a close friend of Epstein's and well-known criminal defense attorney. Epstein required Jane Doe #3 to have sexual relations with Dershowitz on numerous occasions while she was a minor, not only in Florida but also on private planes, in New York, New Mexico, and the U.S. Virgin Islands. In addition to being a participant in the abuse of Jane Doe #3 and other minors, Dershowitz was an eye-witness to the sexual abuse of many other minors by Epstein and several of Epstein's co-conspirators. Dershowitz would later play a significant role in negotiating the NPA on Epstein's behalf. Indeed, Dershowitz helped negotiate an agreement that provided immunity from federal prosecution in the Southern District of Florida not only to Epstein, but also to "any potential co-conspirators of Epstein." NPA at 5. Thus, Dershowitz helped negotiate an agreement with a provision that provided protection for himself against criminal prosecution in Florida for sexually abusing Jane Doe #3. Because this broad immunity would have been controversial if disclosed, Dershowitz (along with other members of Epstein's defense team) and the Government tried to keep the immunity provision secret from all of Epstein's victims and the general public, even though such secrecy violated the Crime Victims' Rights Act.

Ghislaine Maxwell was another person in Epstein's inner circle and a co-conspirator in Epstein's sexual abuse. She was someone who consequently also appreciated the immunity granted by the NPA for the crimes she committed in Florida. In addition to participating in the sexual abuse of Jane Doe #3 and others, Maxwell also took numerous sexually explicit pictures

of underage girls involved in sexual activities, including Jane Doe #3. She shared these photographs (which constituted child pornography under applicable federal laws) with Epstein. The Government is apparently aware of, and in certain instances possesses some of these photographs.

Perhaps even more important to her role in Epstein's sexual abuse ring, Maxwell had direct connections to other powerful individuals with whom she could connect Epstein. For instance, one such powerful individual Epstein forced Jane Doe #3 to have sexual relations with was a member of the British Royal Family, Prince Andrew (a/k/a Duke of York). Jane Doe #3 was forced to have sexual relations with this Prince when she was a minor in three separate geographical locations: in London (at Ghislaine Maxwell's apartment), in New York, and on Epstein's private island in the U.S. Virgin Islands (in an orgy with numerous other under-aged girls). Epstein instructed Jane Doe #3 that she was to give the Prince whatever he demanded and required Jane Doe #3 to report back to him on the details of the sexual abuse. Maxwell facilitated Prince Andrew's acts of sexual abuse by acting as a "madame" for Epstein, thereby assisting in internationally trafficking Jane Doe #3 (and numerous other young girls) for sexual purposes.

Another person in Epstein's inner circle of friends (who becomes apparent with almost no investigative effort) is Jean Luc Brunel. Epstein sexually trafficked Jane Doe #3 to Jean Luc Brunel many times. Brunel was another of Epstein's closest friends and a regular traveling companion, who had many contacts with young girls throughout the world. Brunel has been a model scout for various modeling agencies for many years and apparently was able to get U.S. passports for young girls to "work" as models. He would bring young girls (ranging to ages as

young as twelve) to the United States for sexual purposes and farm them out to his friends, especially Epstein. Brunel would offer the girls “modeling” jobs. Many of the girls came from poor countries or impoverished backgrounds, and he lured them in with a promise of making good money. Epstein forced Jane Doe #3 to observe him, Brunel and Maxwell engage in illegal sexual acts with dozens of underage girls. Epstein also forced Jane Doe #3 to have sex with Brunel on numerous occasions, at places including Epstein’s mansion in West Palm Beach, Little St. James Island in the U.S. Virgin Islands (many including orgies that were comprised of other underage girls), New York City, New Mexico, Paris, the south of France, and California.

Epstein also trafficked Jane Doe #3 for sexual purposes to many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders. Epstein required Jane Doe #3 to describe the events that she had with these men so that he could potentially blackmail them.

The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA. Moreover, even a rudimentary investigation of Jane Doe #3’s relationship to Epstein would have revealed the fact that she had been trafficked throughout the United States and internationally for sexual purposes. Nonetheless, the Government secretly negotiated a non-prosecution agreement with Epstein precluding any Federal prosecution in the Southern District of Florida of Epstein and his co-conspirators. As with Jane Doe #1, and Jane Doe #2, the Government concealed the non-prosecution agreement from Jane Doe #3 – all in violation of her rights under the CVRA – to avoid Jane Doe #3 from raising powerful objections to the NPA that would have shed tremendous public light on Epstein

and other powerful individuals and that would likely have been prevented it from being concluded in the secretive manner in which it was.

Jane Doe #4's Circumstances

If permitted to join this action, Jane Doe #4 would allege, and could prove at trial, that she has CVRA claims similar to those advanced by Jane Doe #1 and Jane Doe #2, based on the following:

As with the other Jane Does, Jane Doe #4 was repeatedly sexually abused by Epstein. In or around the summer of 2002, Jane Doe #4, an economically poor and vulnerable sixteen-year-old child, was told by another one of Epstein's underage minor sex abuse victims, that she could make \$300 cash by giving an old man a massage on Palm Beach. An acquaintance of Jane Doe #4 (also a minor sexual abuse victim of Epstein) telephoned Epstein and scheduled Jane Doe #4 to go to Epstein's house to give him a massage. During that call, Epstein himself got on the phone (a means of interstate communication) with Jane Doe #4, asking her personally to come to his mansion in Palm Beach.

Jane Doe #4 then went to Epstein's mansion and was escorted upstairs to Epstein's large bathroom by one of Epstein's assistants. Shortly thereafter Jeffrey Epstein emerged and lay face down on the table and told Jane Doe #4 to start massaging him. Epstein asked Jane Doe #3 her age and she told him she had recently turned sixteen. Epstein subsequently committed illegal sexual acts against Jane Doe #4 on many occasions.

Epstein used a means of interstate communication (i.e., a cell phone) to arrange for these sexual encounters. Epstein also frequently travelled in interstate commerce (i.e., on his personal jet) for purposes of illegally sexually abusing Jane Doe #4.

The acts Epstein committed against Jane Doe #4, constituted numerous federal sex offenses, some of which do not carry a statute of limitations and thus are not time-barred. *See* 18 U.S.C. § 3283. And these offenses were the kinds of offenses that the Federal Bureau of Investigation (FBI) and U.S. Attorney's Office for the Southern District of Florida were pursuing in 2007. So far as Jane Doe #4 is aware, the U.S. Attorney's Office made no serious effort to locate her. Instead, after identifying approximately forty separate underage sexually abused victims, and apparently preparing a 53-page federal indictment and with full awareness of the existence of many victims like Jane Doe #4 – unidentified and not interviewed – it entered into a non-prosecution agreement barring prosecution of Epstein's federal crimes against these victims. This is contrary to the Government's normal approach in prosecuting federal sex offenses. It also violated Jane Doe #4's rights under the CVRA, including the fact that she had a "reasonable" right to confer with the U.S. Attorney's Office before they entered into an agreement with a sex offender barring prosecution of him for the crimes he committed against her. 18 U.S.C. § 3771(a)(5).

MOTION FOR JOINDER

Jane Doe #3 and Jane Doe #4 now both move to join this action filed by Jane Doe #1 and Jane Doe #2, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Rule 21 provides that "[o]n motion or on its own, the court may at any time, on just terms, add . . . a party." Rule 21 "grants the court broad discretion to permit a change in the parties at any stage of a litigation." *Ford v. Air Line Pilots Ass'n Int'l*, 268 F. Supp. 2d 271, 295 (E.D.N.Y. 2003) (internal quotation omitted). The new victims should be allowed to join the current victims in this action under Rule 21.

The new victims will establish at trial that the Government violated their CVRA rights in the same way as it violated the rights of the other victims. The new victims' participation in this case is important because it appears that the Government intends to raise a factual defense that somehow it did keep Jane Doe #1 and Jane Doe #2 properly informed of what was happening in the criminal prosecution. Of course, if four victims all testify consistently that they were not properly informed by the Government (as we believe they will), that provides a stronger case for a CVRA violation.

In addition, Jane Doe #3 and Jane Doe #4's participation is relevant to a defense the Court has allowed the Government to raise. The Court has previously ruled that the victims' request for rescission of the NPA "implicates a fact-sensitive equitable defense which must be considered in the historical factual context of the entire interface between Epstein, the relevant prosecutorial authorities and the federal offense victims – including an assessment of the allegation of a deliberate conspiracy between Epstein and federal prosecutors to keep the victims in the dark on the pendency of negotiations between Epstein and federal authorities until well after the fact and presentation of the non-prosecution agreement to them as *a fait accompli*." DE 189 at 12 n.6 (emphasis added). Jane Doe #3's and Jane Doe #4's participation in this case will help to show what the "entire interface" was between the Government and the victims and thus to respond to the Government's estoppel arguments as well as other defenses that it appears to be preparing to raise. *See, e.g.*, DE 62 (52-page response from the Government to the victim's summary judgment motion, raising numerous factually-based and other arguments against the victim's position).

Jane Doe #3's and Jane Doe #4's participation is also directly relevant to the discovery disputes currently pending in this case. The Government has raised various relevancy objections to the documents that Jane Doe #1 and Jane Doe #2 are attempting to obtain. The current victims have responded by explaining how these documents are relevant, including explaining how these documents might bear on the way in which Epstein used his powerful political and social connections to secure a favorable plea deal, as well as provide proof of the Government's motive to deliberately fail to investigate certain aspects of the victims' claims in an effort to maintain the secrecy of the facts and resolve the case without the victims' knowledge. *See, e.g.*, DE 266 at 6-10. Jane Doe #3 and Jane Doe #4's participation will help prove the relevancy of these requests, as well as the need for those requests.

One clear example is Request for Production No. 8, which seeks documents regarding Epstein's lobbying efforts to persuade the Government to give him a more favorable plea arrangement and/or non-prosecution agreement, including efforts on his behalf by Prince Andrew and former Harvard Law Professor Alan Dershowitz. Jane Doe #1 and Jane Doe #2 have alleged these materials are needed to prove their allegations that, after Epstein signed the non-prosecution agreement, his performance was delayed while he used his significant social and political connections to lobby the Justice Department to obtain a more favorable plea deal. *See, e.g.*, DE 225 at 7-8 (discussing DE 48 at 16-18). Jane Doe #3 has directly person knowledge of Epstein's connection with some of these powerful people and thus how Epstein might have used them to secure favorable treatment.

Adding two new victims to this case will not delay any of the proceedings. They will simply join in motions that the current victims were going to file in any event. For example, the

new victims will simply join in a single summary judgment motion that the current victims anticipate filing after discovery has been completed.

Nor will adding the new victims prejudice the United States. As the court is aware, this Court is still in its initial discovery stage. The Court is currently considering whether to reject the Government's assertion of privilege over documents regarding the case. *See* DE 265 (victims' reassertion of objections to the Government privilege claims). The new victims do not seek any additional discovery beyond that previously sought by the current victims.² Accordingly, the United States will not be prejudiced or burdened by adding them to this case.

The CVRA does not contain any statute of limitations for filing an action to enforce rights under the statute. Accordingly, were the Court to deny this motion, the result might be that the new victims would then be forced to file a separate suit raising their claims, which would then possibly proceed on a separate litigation track. Rather than require duplicative litigation, the Court should simply grant their motion to join.

Jane Doe #1 and Jane Doe #2 support the joinder motion. Counsel for the victims have discussed this motion with the Government at length in an effort to avoid any need to file a substantive pleading on the issue. Counsel for the victims asked the Government during the summer for its position on joinder. The Government, however, took the matter under advisement for months. Ultimately, after several inquiries from victims counsel, the Government indicated without explanation that it opposes this motion. Counsel for the victims has requested a meeting with the Government on this issue, which will hopefully occur in

² Jane Doe #3 and Jane Doe #4 have asked the Government to provide them with the record of their statements that they provided to the FBI. These FBI 302's should be only a few pages long.

January. In the meantime, however, counsel for the victims believe that it is no longer appropriate to delay filing this motion and accordingly file it at this time. Because the Government is apparently opposing this motion, Jane Doe #3 and Jane Doe #4 have described the circumstances surrounding their claims so that the Court has appropriate information to rule on the motion.

CONCLUSION

Jane Doe #3 and Jane Doe #4 should be allowed to join this action, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Their joinder should be conditioned on the requirement that they not re-litigate any issues previously litigated by Jane Doe #1 and Jane Doe #2. A proposed order to that effect is attached to this pleading.

DATED: January 2, 2015

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing document was served on January 2, 2015, on the following using the Court's CM/ECF system:

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EXHIBIT E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:08-CV-80736-KAM

JANE DOE 1 and JANE DOE 2,

Petitioners,

vs.

UNITED STATES OF AMERICA,

Respondent.

**ORDER DENYING PETITIONERS' MOTION TO JOIN UNDER RULE 21 AND
MOTION TO AMEND UNDER RULE 15**

This cause is before the Court on Jane Doe 3 and Jane Doe 4's Corrected Motion Pursuant to Rule 21 for Joinder in Action ("Rule 21 Motion") (DE 280), and Jane Doe 1 and Jane Doe 2's Protective Motion Pursuant to Rule 15 to Amend Their Pleadings to Conform to Existing Evidence and to Add Jane Doe 3 and Jane Doe 4 as Petitioners ("Rule 15 Motion") (DE 311). Both motions are ripe for review. For the following reasons, the Court concludes that they should be denied.

I. Background

This is an action by two unnamed petitioners, Jane Doe 1 and Jane Doe 2, seeking to prosecute a claim under the Crime Victims' Rights Act (CVRA), 18 U.S.C. § 3771. (DE 1). Generally, they allege that the respondent Government violated their rights under the CVRA by failing to consult with them before negotiating a non-prosecution agreement with Jeffrey Epstein, who subjected them to various sexual crimes while they were minors. (*Id.*). Petitioners initiated this action in July 2008. (*Id.*).

On December 30, 2014, two other unnamed victims, Jane Doe 3 and Jane Doe 4, moved to join as petitioners in this action pursuant to Federal Rule of Civil Procedure 21. (DE 280). Petitioners (Jane Doe 1 and Jane Doe 2) support the Rule 21 Motion. (Id. at 11). Jane Doe 3 and Jane Doe 4 argue that they “have suffered the same violations of their rights under the [CVRA] as the” Petitioners, and they “desire to join in this action to vindicate their rights as well.” (Id. at 1). The Government vehemently opposes joinder under Rule 21. (DE 290). The Government argues that Rule 15 is the proper procedural device for adding parties to an action, not Rule 21. (Id. at 1).

“[O]ut of an abundance of caution,” Petitioners filed a motion to amend their petition under Rule 15, conforming the petition to the evidence and adding Jane Doe 3 and Jane Doe 4 as petitioners. (DE 311 at 2). The Government opposes the Rule 15 Motion as well. (DE 314). Among other things, the Government argues that amending the petition to include Jane Doe 3 and Jane Doe 4 should be denied because of their undue delay in seeking to join the proceedings, and the undue prejudice that amendment will cause. (Id.).

After considering the parties’ submissions and the proposed amended petition, the Court finds that justice does not require amendment in this instance and exercises its discretion to deny the amendment.

II. Discussion

“The decision whether to grant leave to amend a complaint is within the sole discretion of the district court.” Laurie v. Ala. Ct. Crim. Apps., 256 F.3d 1266, 1274 (11th Cir. 2001). “The court should freely give leave when justice so requires.” Fed. R. Civ. P. 15(a)(2). Justice does not require amendment in several instances, “includ[ing] undue delay, bad faith, dilatory motive

on the part of the movant, . . . undue prejudice to the opposing party by virtue of allowance of the amendment, [and] futility of amendment.” Laurie, 256 F.3d at 1274 (quoting Foman v. Davis, 371 U.S. 178, 182 (1962)). In addition to considering the effect of amendment on the parties, the court must consider “the importance of the amendment on the proper determination of the merits of a dispute.” 6 Wright & Miller, Fed. Prac. & Fed. P. § 1488, p. 814 (3d ed. 2010). Justice does not require amendment where the addition of parties with duplicative claims will not materially advance the resolution of the litigation on the merits. See Herring v. Delta Air Lines, Inc., 894 F.2d 1020, 1024 (9th Cir. 1989).

A. Rule 21 Motion

Jane Doe 3 and Jane Doe 4’s first attempt to join in this proceeding was brought under Rule 21. (DE 280). “If parties seek to add a party under Rule 21, courts generally use the standard of Rule 15, governing amendments to pleadings, to determine whether to allow the addition.” 12 Wright & Miller, Fed. Prac. & Fed. P., p. 432 (3d ed. 2013); see also Galustian v. Peter, 591 F.3d 724, 729-30 (4th Cir. 2010) (collecting cases and noting that Rule 15(a) applies to amendments seeking to add parties); Frank v. U.S. West, Inc., 3 F.3d 1357, 1365 (10th Cir. 1993) (“A motion to add a party is governed by Fed. R. Civ. P. 15(a) . . .”).

Rule 21, “Misjoinder and Non-joinder of Parties,” provides the court with a tool for correcting the “misjoinder” of parties that would otherwise result in dismissal. Fed. R. Civ. P. 21. Insofar as Rule 21 “relates to the addition of parties, it is intended to permit the bringing in of a person, who through inadvertence, mistake or for some other reason, had not been made a party and whose presence as a party is later found necessary or desirable.” United States v. Com. Bank of N. Am., 31 F.R.D. 133, 135 (S.D.N.Y. 1962) (internal quotation marks omitted).

In their Rule 21 Motion, Jane Doe 3 and Jane Doe 4 do not claim that they were omitted from this proceeding due to any “inadvertence” or “mistake” by Petitioners; rather, they seek to join this proceeding as parties that could have been permissively joined in the original petition under Rule 20 (“Permissive Joinder of Parties”). As courts generally use the standards of Rule 15 to evaluate such circumstances, the Court will consider the joinder issue as presented in the Rule 15 Motion.¹ The Court will consider the arguments presented in the Rule 21 Motion as if they are set forth in the Rule 15 Motion as well. Because the arguments are presented in the Rule 15 Motion (and because the Court is denying the Rule 15 Motion on its merits, as discussed below), the Rule 21 Motion will be denied.

The Court also concludes that portions of the Rule 21 Motion and related filings should be stricken from the record. Pending for this Court’s consideration is a Motion for Limited Intervention filed by Alan M. Dershowitz, who seeks to intervene to “strike the outrageous and impertinent allegations made against him and [to] request[] a show cause order to the attorneys that have made them.” (DE 282 at 1). The Court has considered Mr. Dershowitz’s arguments, but it finds that his intervention is unnecessary as Federal Rule of Civil Procedure 12(f) empowers the Court “on its own” to “strike from a pleading an insufficient defense or any redundant, immaterial, impertinent, or scandalous matter.” Fed. R. Civ. P. 12(f).

Petitioners’ Rule 21 Motion consists of relatively little argumentation regarding why the Court should permit them to join in this action: they argue that (1) they were sexually abused by

¹ The Court notes that, regardless of which motion it considers, the same standard governs the addition of parties under Rule 21 and Rule 15. See Goston v. Potter, No. 08-cv-478 FJS ATB, 2010 WL 4774238, at *5 (N.D.N.Y. 2010) (citing Bridgeport Music, Inc. v. Universal Music Grp., Inc., 248 F.R.D. 408, 412 (S.D.N.Y. 2008)).

Jeffrey Epstein, and (2) the Government violated their CVRA rights by concealing the non-prosecution agreement with them. (DE 280 at 3; see id. at 7-8). However, the bulk of the Rule 21 Motion consists of copious factual details that Jane Doe 3 and Jane Doe 4 “would prove” “[i]f allowed to join this action.” (Id. at 3, 7). Specifically, Jane Doe 3 proffers that she could prove the circumstances under which a non-party introduced her to Mr. Epstein, and how Mr. Epstein sexually trafficked her to several high-profile non-party individuals, “including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders.” (Id. at 3-6). She names several individuals, and she offers details about the type of sex acts performed and where they took place. (See id. at 5).²

At this juncture in the proceedings, these lurid details are unnecessary to the determination of whether Jane Doe 3 and Jane Doe 4 should be permitted to join Petitioners’ claim that the Government violated their rights under the CVRA. The factual details regarding with whom and where the Jane Does engaged in sexual activities are immaterial and impertinent to this central claim (i.e., that they were known victims of Mr. Epstein and the Government owed them CVRA duties), especially considering that these details involve non-parties who are not related to the respondent Government. These unnecessary details shall be stricken.

The original Rule 21 Motion (DE 279) shall be stricken in its entirety, as it is wholly superseded by the “corrected” version of the Rule 21 Motion (DE 280). From the corrected Rule 21 Motion, the Court shall strike all factual details regarding Jane Doe 3 between the following sentences: “The Government then concealed from Jane Doe #3 the existence of its NPA from

² Jane Doe 4’s proffer is limited to sexual acts between Mr. Epstein and herself. (See DE 280 at 7-8).

Jane Doe #3, in violation of her rights under the CVRA” (id. at 3); and “The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA” (id. at 6). As none of Jane Doe 4’s factual details relate to non-parties, the Court finds it unnecessary to strike the portion of the Rule 21 Motion related to her circumstances. Regarding the Declaration in support of Petitioners’ response to Mr. Dershowitz’s motion to intervene (DE 291-1), the Court shall strike paragraphs 4, 5, 7, 11, 13, 15, 19 through 53, and 59, as they contain impertinent details regarding non-parties. Regarding the Declaration of Jane Doe 3 in support of the Rule 21 Motion (DE 310-1), the Court shall strike paragraphs 7 through 12, 16, 39, and 49, as they contain impertinent details regarding non-parties. Jane Doe 3 is free to reassert these factual details through proper evidentiary proof, should Petitioners demonstrate a good faith basis for believing that such details are pertinent to a matter presented for the Court’s consideration.

As mentioned, Mr. Dershowitz moves to intervene “for the limited purposes of moving to strike the outrageous and impertinent allegations made against him and requesting a show cause order to the attorneys that have made them.” (DE 282 at 1). As the Court has taken it upon itself to strike the impertinent factual details from the Rule 21 Motion and related filings, the Court concludes that Mr. Dershowitz’s intervention in this case is unnecessary. Accordingly, his motion to intervene will be denied as moot.³ Regarding whether a show cause order should

³ This also moots Mr. Dershowitz’s Motion for Leave to File Supplemental Reply in Support of Motion for Limited Intervention. (DE 317). Denying Mr. Dershowitz’s motion to intervene also renders moot Petitioners’ motion (DE 292) to file a sealed document supporting its response to Mr. Dershowitz’s motion. It will accordingly be denied as moot, and DE 293 (the sealed response) will be stricken from the record.

issue, the Court finds that its action of striking the lurid details from Petitioners' submissions is sanction enough. However, the Court cautions that all counsel are subject to Rule 11's mandate that all submissions be presented for a proper purpose and factual contentions have evidentiary support, Fed. R. Civ. P. 11(b)(1) and (3), and that the Court may, on its own, strike from any pleading "any redundant, immaterial, impertinent, or scandalous matter," Fed. R. Civ. P. 12(f).

B. Rule 15 Motion

Between their two motions (the Rule 21 Motion and Rule 15 Motion), Jane Doe 3 and Jane Doe 4 assert that "they desire to join in this action to vindicate their rights [under the CVRA] as well." (DE 280 at 1). Although Petitioners already seek the invalidation of Mr. Epstein's non-prosecution agreement on behalf of all "other similarly-situated victims" (DE 189 at 1; DE 311 at 2, 12, 15, 18-19), Jane Doe 3 and Jane Doe 4 argue that they should be fellow travelers in this pursuit, lest they "be forced to file a separate suit raising their claims" resulting in "duplicative litigation" (DE 280 at 11). The Court finds that justice does not require adding new parties this late in the proceedings who will raise claims that are admittedly "duplicative" of the claims already presented by Petitioners.

The Does' submissions demonstrate that it is entirely unnecessary for Jane Doe 3 and Jane Doe 4 to proceed as parties in this action, rather than as fact witnesses available to offer relevant, admissible, and non-cumulative testimony. (See, e.g., DE 280 at 2 (Jane Doe 3 and Jane Doe 4 "are in many respects similarly situated to the current victims"), 9 ("The new victims will establish at trial that the Government violated their CVRA rights in the same way as it violated the rights of the other victims."), 10 (Jane Doe 3 and Jane Doe 4 "will simply join in motions that the current victims were going to file in any event."), 11 (litigating Jane Doe 3 and

Jane Doe 4's claims would be "duplicative"); DE 298 at 1 n.1 ("As promised . . . Jane Doe No. 3 and Jane Doe No. 4 do not seek to expand the number of pleadings filed in this case. If allowed to join this action, they would simply support the pleadings already being filed by Jane Doe No. 1 and Jane Doe No. 2."); DE 311 at 5 n.3 ("[A]ll four victims (represented by the same legal counsel) intend to coordinate efforts and avoid duplicative pleadings."), 15 (Jane Doe 3 and Jane Doe 4 "challenge the same secret agreement i.e., the NPA that the Government executed with Epstein and then concealed from the victims. This is made clear by the proposed amendment itself, in which all four victims simply allege the same general facts.")). As the Does argue at length in their Rule 15 Motion, Jane Doe 1's original petition "specifically allege[s] that the Government was violating not only her rights but the rights of other similarly-situated victims." (DE 311 at 2). The Court fails to see why the addition of "other similarly-situated victims" is now necessary to "vindicate their rights as well." (DE 280 at 1).

Of course, Jane Doe 3 and Jane Doe 4 can participate in this litigated effort to vindicate the rights of similarly situated victims there is no requirement that the evidentiary proof submitted in this case come only from the named parties. Petitioners point out as much, noting that, regardless of whether this Court grants the Rule 15 Motion, "they will call Jane Doe No. 3 as a witness at any trial." (DE 311 at 17 n.7). The necessary "participation" of Jane Doe 3 and Jane Doe 4 in this case can be satisfied by offering their properly supported and relevant, admissible, and non-cumulative testimony as needed, whether through testimony at trial (see DE 280 at 9) or affidavits submitted to support the relevancy of discovery requests⁴ (see

⁴ The non-party Jane Does clearly understand how to submit affidavits. (See DEs 291-1, 310-1).

id. at 10). Petitioners do not contend that Jane Doe 3 and Jane Doe 4’s “participation in this case” can only be achieved by listing them as parties.

As it stands under the original petition, the merits of this case will be decided based on a determination of whether the Government violated the rights of Jane Doe 1, Jane Doe 2, and all “other similarly situated victims” under the CVRA. Jane Doe 3 and Jane Doe 4 may offer relevant, admissible, and non-cumulative evidence that advances that determination, but their participation as listed parties is not necessary in that regard. See Herring, 894 F.2d at 1024 (District court did not abuse its discretion by denying amendment where “addition of more plaintiffs . . . would not have affected the issues underlying the grant of summary judgment.”); cf. Arthur v. Stern, 2008 WL 2620116, at *7 (S.D. Tex. 2008) (Under Rule 15, “courts have held that leave to amend to assert a claim already at issue in [another lawsuit] should not be granted if the same parties are involved, the same substantive claim is raised, and the same relief is sought.”).⁵ And, as to Jane Doe 4 at least, adding her as a party raises unnecessary questions about whether she is a proper party to this action.⁶

Petitioners also admit that amending the petition to conform to the evidence by including references to the non-prosecution agreement itself is “unnecessary” as the “existing petition is broad enough to cover the developing evidence in this case.” (DE 311). The Court

⁵ The Court expresses no opinion at this time whether any of the attestations made by Jane Doe 3 and Jane Doe 4 in support of their motion will be relevant, admissible, and non-cumulative.

⁶ The Government contends that Jane Doe 4 is not a true “victim” in this case because she was not known at the time the Government negotiated the non-prosecution agreement, and accordingly she was not entitled to notification rights under the CVRA. (See DE 290 at 10). Any “duplicative” litigation filed by Jane Doe 4 would necessarily raise the issue of whether she has standing under the CVRA under these circumstances.

agrees, and it concludes that justice does not require amending the petition this late in the proceedings.

III. Conclusion

Accordingly, it is hereby **ORDERED AND ADJUDGED** as follows: the Rule 21 Motion (DE 280) is **DENIED**; the Rule 15 Motion (DE 311) is **DENIED**; Intervenor Dershowitz's Motion for Limited Intervention (DE 282) and Motion for Leave to File Supplemental Reply in Support of Motion for Limited Intervention (DE 317) are **DENIED AS MOOT**; Petitioners' Motion to Seal (DE 292) is **DENIED AS MOOT**; the following materials are hereby **STRICKEN** from the record:

- DE 279, in its entirety.
- DE 280, all sentences between the following sentences: "The Government then concealed from Jane Doe #3 the existence of its NPA from Jane Doe #3, in violation of her rights under the CVRA" (DE 280 at 3); and "The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA" (DE 280 at 6).
- DE 291-1, paragraphs 4, 5, 7, 11, 13, 15, 19 through 53, and 59.
- DE 310-1, paragraphs 7 through 12, 16, 39, and 49.
- DE 293, in its entirety.

DONE AND ORDERED in chambers at West Palm Beach, Palm Beach County, Florida, this 6th day of April, 2015.



KENNETH A. MARRA
United States District Judge

EXHIBIT F

From: <ross@acuityreputation.com>
Date: 2 January 2015 at 20:38
Subject: Ghislaine Maxwell
To: Rossacuity Gow <ross@acuityreputation.com>
bcc: martin.robinson@mailonline.co.uk,
P.Peachey@independent.co.uk,
nick.sommerlad@mirror.co.uk,
david.brown@thetimes.co.uk,
nick.alway@bbc.co.uk,
jo-anne.pugh@bbc.co.uk

To Whom It May Concern,
Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.
Thanks for your understanding.
Best
Ross

Ross Gow
ACUITY Reputation

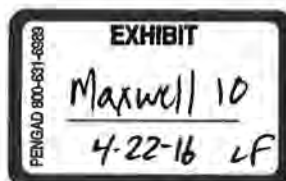
Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Dershowitz is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Sent from my BlackBerry® wireless device



GM_00068

EXHIBIT G

ROSS NEIL SUTHERLAND GOW - 11/18/2016

1 IN THE HIGH COURT OF JUSTICE
2 QUEEN'S BENCH DIVISION

3 Claim No. CR 2016-624

4 BETWEEN:

5 VIRGINIA L. GIUFFRE Applicant,
6 - and -
7 ROSS GOW,
8 Respondent.

9 AND:

10 UNITED STATES DISTRICT COURT
11 SOUTHERN DISTRICT OF NEW YORK

12 Virginia L. Giuffre,
13 Plaintiff,

14 v.

Case No. 15-cv-07433-RWS

15 Ghislaine Maxwell,
16 Defendant.

17 Friday, November 18, 2016

18 AT: 8:27 a.m.

19 Taken at:

20
21 Essex Chambers 29,
22 81 Chancery Lane,
23 London, UK, WC2A 1DD

24 Court Reporter: Lisa Barrett, Accredited Real-time
25 Reporter

1 A P P E A R A N C E S:

2

3 Appearing for the Plaintiff:

4 MEREDITH L. SCHULTZ, ESQ.
5 BOIES, SCHILLER & FLEXNER, LLP
6 401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, FL 33301

7 DAVID TURNER, ESQ.
8 BOIES, SCHILLER & FLEXNER (UK) LLP
9 25 Old Broad Street
London, UK EC2N 1HQ

10 Counsel for Defendant, Ghislaine Maxwell:

11 LAURA A. MENNIGER, P.C.
12 HADDON, MORGAN and FOREMAN, P.C.
13 150 East Tenth Avenue
Denver, CO 80203

14 Counsel for Defendant, Ross Neil Sutherland Gow
15 (witness):

16 RICHARD SPEARMAN, Q.C.
17 PHILIP BARDEN,
18 DEVONSHIRES SOLICITORS LLP
30 Finsbury Circus, London
EC2M 7DT, UK

19

20 Examiner:

21 ALLEN DYER,
22 4 Pump Court
23 Temple, London, EC4Y 7AN
24 DX 303 LDE
25

1 W I T N E S S I N D E X

2	Witness	Page
3	ROSS NEIL SUTHERLAND GOW (sworn)	10
4	Examination by Ms. Schultz	10
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6	Re-examination by Ms. Schultz	119

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8 E X H I B I T I N D E X

9	No.	Description	Page
10	1	Consent Order before Master Fontaine	11
11	2	Email from ross@acuityreputation.com to	13
12		Ross@acuity.com, bcc:	
13		Martin.robinson@mailonline.co.uk,	
14		P.Peachy@indepdent.co.uk,	
15		Nick.sommerland@mirror.co.uk,	
16		david.brown@thetimes.co.uk,	
17		Nick.alway@bbc.co.uk,	
18		Jo-anne.pugh@bbc.co.uk,	
19		dated 2 January 2015,	
20		Bates No. GM_00068	
21	3	Email from James Ball to Ross Gow,	30
22		dated 1 January 2015,	
23		Bates No. RG(UK)_000002	
24			
25			

1	E X H I B I T I N D E X		
2	No.	Description	Page
3	4	Email from Ross Gow to G Max,	35
4		cc Brian Basham, dated January 2, 2015,	
5		Bates No. GM_01043-44	
6	5	Email from ross@acuityreputation.com,	37
7		to G Max, sent Friday, January 2, 2015,	
8		Fw: The Times - David Brown, Bates No.	
9		GM_01038-39	
10	6	Email from ross@acuityreputation.com	38
11		to G Max, sent Friday, January 2,	
12		2015, Subject: Agreed copy,	
13		Bates Nos. GM_01036-37	
14	7	Email from ross@acuityreputation.com	40
15		to G Max, sent Friday, January 2,	
16		2015, Subject: Re: Agreed copy,	
17		Bates No. GM_01040-01041	
18	8	Email from ross@acuityreputation.com ,	42
19		dated Friday, January 2, 2015,	
20		To: G Max, Bates No. GM_01042	
21	9	Email from ross@acuityreputation.com,	44
22		dated 2 January 2015, To: G Max	
23		gmax1@ellmax.com, Cc: Philip	
24		Barden, philip.barden@devonshires.co.uk,	
25		Bates Nos. RG(UK) _00009	

ROSS NEIL SUTHERLAND GOW - 11/18/2016

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1	E X H I B I T I N D E X		
2	No.	Description	Page
3	10	Email from gmax1@ellmax.com, sent:	50
4		Saturday January 10, 2015,	
5		To Philip Barden; Ross Gow,	
6		Bates GM_01060-68	
7	11	Email chain, latest in time from	54
8		G Maxwell to J Jep, sent	
9		Sunday, January 11, 2015, Bates Nos.	
10		GM_01069-72	
11	12	Email chain, latest in time from	60
12		E Jeffrey jeevacation@gmail.com,	
13		dated Sunday, January 11, 2015,	
14		7:15 a.m., to G Maxwell, Bates	
15		Nos. GM_01076-77	
16	13	Email chain, latest in time from	65
17		Jeffrey E jeevacation@gmail.com,	
18		sent Wednesday, January 21, 2015	
19		4:47 p.m. To: G Maxwell, Bates	
20		Nos. GM_01088-90	
21			
22			
23			
24			
25			

1	E X H I B I T I N D E X		
2	No.	Description	Page
3	14	Email chain, latest in time from	68
4		Nick Sommerlad, dated 2 January 2015,	
5		21:45, To ross@acuityreputation.com	
6		Bates Nos. RG(UK)_ 000004, one page	
7	15	Email from Ross Gow dated Saturday,	71
8		3 January 2015, To David Mercer, Bates Nos.	
9		RG(UK)_000005-08	
10	16	Email string from Ross Gow to G Max;	73
11		Philip Barden, dated Tues,	
12		February 24, 2015, Bates Nos.	
13		GM_00577 - one page	
14	17	Email from G Maxwell to Ross Gow,	75
15		dated Thurs February 26, 2015,	
16		Bates Nos. GM_00578	
17	18	Email from Ross Gow to G Maxwell,	77
18		dated Thursday, February 26, 2015,	
19		Bates Nos. GM_00579	
20	19	Email from Ross Gow to G Max;	78
21		Philip Barden, dated Wednesday,	
22		April 8, 2015, Bates Nos. GM_00580	
23			
24			
25			

ROSS NEIL SUTHERLAND GOW - 11/18/2016

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1	E X H I B I T I N D E X		
2	No.	Description	Page
3			
4	20	Email from G Max to Ross Gow;	79
5		Philip Barden, dated Wednesday,	
6		May 6, 2015, Bates Nos. GM_0058384	
7	21	Email chain, latest in time from	81
8		Ross Gow to G Maxwell; Philip Barden,	
9		dated Wednesday, May 6, 2015, Bates Nos.	
10		GM_00585-587	
11	22	Email from Ross Gow to Scott Adam,	82
12		dated Wednesday, May 6, 2015,	
13		Bates No. GM_00589-590	
14	23	Website print out Bates No.	82
15		GUIFFRE008453	
16	24	Website printout, Bates Nos.	93
17		GUIFFRE008454-455 - two pages	
18	25	Email from Ross Gow to G Max,	100
19		Philip Barden, Bates Nos. GM_00594	
20	26	Website screenshot printout of	109
21		Acuity Reputation - two pages	
22			
23			
24			
25			

1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Here begins video card
3 number 1, volume I, in the video deposition of Ross Gow.

4 This is taken in the matter of Virgina Guiffre
5 and Ross Gow. This is being heard in the High Court of
6 Justice, Queen's Bench Division, Senior Master, claim
7 number CR-21016-624.

8 Today's date is November 18, 2016. The time on
9 the video screen is 08:26 a.m., local time in London.

10 The video operator today is Phillip Hill from
11 DTI Court Reporting Solutions.

12 The court reporter is Lisa Barrett from DTI
13 Court Reporting Solutions.

14 This video deposition is taking place at the
15 Essex Chambers in London.

16 I will now hand over the proceedings to the
17 Examiner. Thank you, sir.

18 MR. DYER: Would counsel or lawyers present,
19 please identify themselves for the record, first?

20 MS. SCHULTZ: I'm Meredith Schultz from Boise
21 Schiller and Flexner LLP, appearing for the Plaintiff,
22 Ms. Virginia Guiffre. With me is my colleague, David
23 Turner, also from Boies, Schiller and Flexner LLP.

24 MS. MENNINGER: I'm Laura Menninger from
25 Haddon, Morgan and Foreman on behalf of Ghislaine

1 worse objection, or worse grounds for me. 08:56:26

2 MR. DYER: I think questions of payment do not 08:56:28

3 fall within the scope. 08:56:30

4 BY MS. SCHULTZ: 08:56:38

5 Q. Okay. Are you currently retained by Ms. 08:56:38

6 Maxwell for professional services. 08:56:39

7 A. If I could go back to my previous answer, Ms. 08:56:42

8 Maxwell is a project client, and it's on a day rate. If 08:56:46

9 -- so, for the sake of argument between 2nd of 08:56:55

10 January 2015 and the 1st of February 2016 we were quite 08:56:57

11 busy answering these incoming calls, so there was quite a 08:57:03

12 lot of work at that point in time. Recently there's been 08:57:06

13 no work. There's been no need because the press activity 08:57:08

14 has died down, our function is somewhat redundant. 08:57:12

15 Q. Can you estimate the last time that you worked 08:57:15

16 on this account at your day rate? 08:57:17

17 A. It would have been in 2015. Probably April, 08:57:30

18 May, something like that. No invoices, no -- no payment 08:57:35

19 in 2016 from my recollection. 08:57:41

20 BY MS. SCHULTZ: 08:57:47

21 Q. Mr. Gow, I'm going to hand you another 08:57:47

22 document. 08:57:49

23 (Exhibit 3 was marked for identification.) 08:30:48

24 MS. SCHULTZ: Point of procedure: I have only 08:58:09

25 three copies of these documents for each of the 08:58:11

1 remaining, so... 08:58:14

2 I've marked as Exhibit 3 RG(UK)_00002. Do you 08:58:15

3 recognize this email? 08:58:47

4 A. I do. 08:58:48

5 Q. Did you receive this email? 08:58:49

6 A. I did, on the -- on New Year's Day 2015. 08:58:50

7 Q. Did you contact Ms. Maxwell after receiving 08:58:57

8 this email? 08:58:58

9 A. I did. 08:58:59

10 Q. Did you make any response to Mr. Ball in any 08:59:19

11 form? 08:59:22

12 A. I did. 08:59:22

13 Q. Can you tell me what you -- what response you 08:59:25

14 made? 08:59:26

15 A. Well, the response to Mr. Ball was part of a 08:59:27

16 series of responses having spoken to my client within 24 08:59:33

17 hours or so, we got back to Mr. Ball with an agreed 08:59:41

18 statement which went out to a number of media. 08:59:44

19 Q. When you say "agreed statement" can you tell me 08:59:50

20 more about what you mean? Who agreed to the statement? 08:59:52

21 A. I need to give you some context, if I may, 08:59:58

22 about that statement. 09:00:01

23 So, this is on New Year's Day. I was 09:00:02

24 in France so the email time here of 21:46, in French 09:00:04

25 time was 22:46, and I was getting up early the next 09:00:10

1 morning to drive my family back from the south of 09:00:14
2 France to England, which is a 14-hour journey, door to 09:00:17
3 door. So on the morning of the 2nd of January, 09:00:22
4 bearing in mind that Ms. Maxwell, I think was in New 09:00:26
5 York then, she was five hours behind, so there was 09:00:28
6 quite a lot of, sort of time difference between the 09:00:30
7 various countries here, I sent her an email, I 09:00:35
8 believe, saying -- parsing this -- forwarding this 09:00:38
9 email to her saying "How do you wish to proceed?" And 09:00:41
10 then I was on the telephone -- I had two telephones in 09:00:45
11 the car, I received in excess of 30 phone calls from 09:00:50
12 various media outlets on the 2nd of January, all 09:00:54
13 asking for information about how Ms. Maxwell was 09:01:00
14 looking to respond to the latest court filings, which 09:01:04
15 were filed on the 30th of December as I understand. 09:01:10
16 And by close -- towards close of play 09:01:13
17 on the 2nd, I received an email forwarded by 09:01:16
18 Ms. Maxwell, containing a draft statement which my 09:01:33
19 understanding was the majority of which had been 09:01:36
20 drafted by Mr. Barden with a header along the lines of 09:01:39
21 "This is the agreed statement." At close of play on 09:01:44
22 the 2nd. 09:01:48
23 So I -- I was -- I had gone under the 09:01:50
24 Channel Tunnel and I was sitting on the other side and 09:01:54
25 that email, which my understanding was that it had 09:01:57

1 been signed off by the client, effectively, was then 09:02:01
2 sent out to a number of media, including Mr. Ball and 09:02:05
3 various other UK newspapers. 09:02:09

4 Q. Mr. Gow, when you say "end of play" and "close 09:02:12
5 of play," are you referring to sending the email that's 09:02:15
6 Exhibit 2? 09:02:18

7 A. Yes, I am. 09:02:24

8 MR. DYER: My understanding is that it went to 09:02:29
9 people other than those listed? 09:02:30

10 THE WITNESS: Yes, that is -- 09:02:32

11 MR. DYER: Just a sample. 09:02:34

12 THE WITNESS: That is a sample. Everyone who 09:02:35
13 effectively -- well, the detail on this, I was driving, 09:02:37
14 so my eldest son in the back had my BlackBerry and was 09:02:40
15 trying to capture -- it was a pretty chaotic day. 09:02:43

16 Most people in the UK were on holiday. In fact, 09:02:48
17 it was a holiday weekend, our office was closed, my PA was 09:02:50
18 on holiday, so my son was basically doing an internship in 09:02:54
19 the back of the car, downloading the names of the callers 09:02:58
20 from various media outlets and -- so we had a list of 09:03:02
21 those so when I got to the car park, at the end of the 09:03:05
22 Eurotunnel thing in the UK, I had numerous names, so the 09:03:09
23 email went out to a wide range of people. 09:03:14

24 But the 30 or so calls I had is an aggregate 09:03:17
25 number, so there might have been five calls from the BBC 09:03:20

1 from different people so they -- the BBC would only write 09:03:24
2 one story, there wouldn't be five versions of it, so 30 is 09:03:27
3 an aggregate number. 09:03:31

4 BY MS. SCHULTZ: 09:03:34

5 Q. Okay. Looking again at Exhibit 2, could you 09:03:35
6 please review the individuals or email addresses of 09:03:37
7 the -- listed in the "To" and "bcc" portion? 09:03:41

8 A. Yep. 09:03:50

9 Q. Did you send this written statement to any 09:03:51
10 other individuals or entities who are not listed in that 09:03:53
11 portion? 09:03:57

12 A. Within -- within 24 hours of this, yes, a wider 09:03:58
13 range of people, definitely. 09:04:03

14 This was the initial -- these are the 09:04:05
15 most pressing ones, who said they were going to write 09:04:07
16 a story whether they had -- if I could just explain a 09:04:10
17 bit more context again in the world of PR. When you 09:04:13
18 are in the field you're engaged and you've just -- 09:04:16
19 you've got to prioritize who you spoke to and whoever 09:04:19
20 shouts the loudest usually gets responded to first. 09:04:22

21 So the reason there are two BBC people 09:04:25
22 there for instance, is there's BBC broadcast radio, 09:04:27
23 and BBC TV, and they were coming at -- from different 09:04:30
24 angles for different stories, but there was a certain 09:04:35
25 sense of urgency and immediacy. So the half a dozen 09:04:38

1 or so here were the ones that we prioritized to deal 09:04:44
2 with that night because they were publishing the next 09:04:46
3 day or -- or thereabouts, but for instance we also 09:04:49
4 spoke to the Daily Express. I can't remember the name 09:04:52
5 of the gentleman there, or the lady, but I remember 09:04:56
6 that was early the next morning when we got on to 09:04:58
7 other channels. 09:05:04

8 Q. So you sent this statement to additional 09:05:06
9 individuals on January 3rd? 09:05:09

10 A. Not just on January 3rd. I mean, as we had an 09:05:13
11 agreed statement there, and I do recall there is a typo 09:05:16
12 in this which is "Virginia" and "Victoria" -- there was a 09:05:20
13 transposition there. So the original email went out with 09:05:24
14 the typo because that was taken from the -- the statement 09:05:28
15 that I believe Mr. Barden was broadly the architect of, 09:05:35
16 but forwarded by Ms. Maxwell. So I just -- I took that 09:05:42
17 as a verbatim statement and sent it out. I re-read it in 09:05:45
18 the calm light of day the next morning. There was at 09:05:50
19 least one typo in it so I changed that and reached out, 09:05:52
20 again, to these people, updating the typo and sent it out 09:05:57
21 to additional people. 09:06:07

22 BY MS. SCHULTZ: 09:06:09

23 Q. Mr. Gow, I'm going to hand you another 09:06:15
24 document. I'm going to mark this as Exhibit 4. 09:06:17

25 (Exhibit 4 was marked for identification.) 09:06:26

1 BY MS. SCHULTZ: 09:06:28

2 Q. This is a document that is Bates labeled 09:06:31

3 GM_01043. 09:06:34

4 A. Thank you. 09:06:38

5 Q. The top email on this document says "From: Ross 09:06:59

6 Gow." Did you send this email? 09:07:02

7 A. I believe I did, yes. 09:07:07

8 Q. Did you send it to Ms. Maxwell? 09:07:08

9 A. Yes. 09:07:09

10 Q. In the "To" field, when it says "G Max," do you 09:07:11

11 recognize that to be Ms. Maxwell's email address? 09:07:18

12 A. Yes. 09:07:23

13 Q. In the second paragraph of this email it 09:07:37

14 states: 09:07:39

15 "Please advise how you wish to handle this." [As 09:07:40

16 read] 09:07:43

17 Did you receive a response from Ms. Maxwell? 09:07:43

18 A. Bearing in mind I was driving all that day, I 09:07:47

19 can't recall what the exact response was but from memory, 09:07:52

20 it was along the lines of she would get back to me with 09:07:57

21 how she wished to proceed. 09:08:03

22 BY MS. SCHULTZ: 09:08:04

23 Q. Okay. 09:08:25

24 Mr. Gow, I'm going to hand you another 09:08:26

25 document. I'm going to mark it as Exhibit 5. 09:08:27

1 had existing authorization to make statements on 11:39:08
2 Ms. Maxwell's behalf due to the reauthorization 11:39:11
3 letter; is that correct? 11:39:14

4 A. I believe that from the 2nd of January 2015, 11:39:15
5 I had an ongoing re-established authority to represent 11:39:20
6 her, within the parameters of the 2011, 2015 press 11:39:23
7 releases, there or thereabouts. 11:39:30

8 MS. SCHULTZ: Mr. Dyer, I have no further 11:39:35
9 questions. 11:39:36

10 MR. DYER: Thank you. That concludes your 11:39:38
11 deposition. 11:39:39

12 THE WITNESS: Thank you, sir. 11:39:40

13 MR. DYER: Thank you very much. 11:39:41

14 THE VIDEOGRAPHER: Going off the record, the
15 time is 11:39. End of video card number 3, volume I, and
16 end of the video deposition of Ross Gow.

17 (Whereupon, the deposition concluded at 11:39
18 a.m.)

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Lisa Barrett

Lisa Barrett, RPR, CRR, CRC, CSR
Certified Real-time Court Reporter

1 Subscribed and sworn to before me this
2 20th day of November, 2016.

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Draft Only

1 CERTIFICATE OF DEPONENT

2

3 I, ROSS NEIL SUTHERLAND GOW, hereby certify that I
4 have read the foregoing pages, numbered 1 through 122
5 of my deposition of testimony taken in these
6 proceedings on this 18th day of November, 2016 and
7 with the exception of the changes listed on the next.
8 page and/or corrections, if any, find them to be
9 a true and accurate transcription thereof.

10

11 Signed:

12 Name: ROSS NEIL SUTHERLAND GOW

13 Date:

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1 CERTIFICATE OF EXAMINER

2 I, ALLEN DYER, of 4 Pump Court
3 Temple, London, EC4Y 7AN DX 303 LDE have been
4 appointed as Examiner herein pursuant to an Order of
5 Master Fontaine dated 29 September 2016. It has been
6 agreed by all parties herein that the evidence of the
7 witness, ROSS NEIL SUTHERLAND GOW, should be taken
8 down in shorthand and that the transcript of the said
9 notes of evidence should be deemed to be the
10 deposition of the said witness.

11
12 I certify that, the oath having been duly
13 administered, the witness has been examined pursuant
14 to the said order. The pages of transcript annexed
15 hereto were furnished to me by DTI, Lisa Barrett,
16 Accredited Real-time Reporter, as containing the
17 transcript of the notes of the evidence of the witness
18 pursuant to the order.

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1 CERTIFICATE OF DEPONENT

2

3 I, Ross Neil Sutherland Gow, hereby certify that I
4 have read the foregoing pages, numbered 1 through 122,
5 of my video deposition of testimony taken in these
6 proceedings on this 18th day of November, 2016 and,
7 with the exception of the changes listed on the next
8 page and/or corrections, if any, find them to be a
9 true and accurate transcription thereof.

7

8

9 Signed:

10 Name: Ross Neil Sutherland Gow

11 Date:

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1 CERTIFICATE OF COURT REPORTER

2

3 I, Lisa M. Barrett, an Accredited Real-time Reporter,
 4 hereby certify that the testimony of the witness Ross
 5 Neil Sutherland Gow in the foregoing transcript,
 6 numbered pages 1 through 122, taken on this 18th day
 7 of November, 2016 was recorded by me in machine
 8 shorthand and was thereafter transcribed by me; and
 9 that the foregoing transcript is a true and accurate
 10 verbatim record of the said testimony.

11

12

13 I further certify that I am not a relative, employee,
 14 counsel or financially involved with any of the
 15 parties to the within cause, nor am I an employee or
 16 relative of any counsel for the parties, nor am I, in
 17 any way, interested in the outcome of the within
 18 cause.

19

20

21 Signed: 

22 Name: Lisa M. Barrett, RPR, CRR, CRC, CSR

23 Date: November 30th 2016

24

25

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

From: James Ball <james.ball@theguardian.com>

Date: 1 January 2015 at 21:46

Subject: URGENT - Ghislaine Maxwell

To: ross@acuityreputation.com

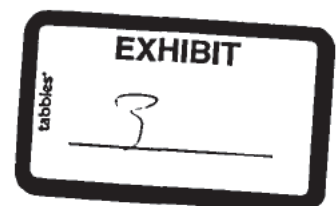
Dear Ross,

I'm writing to you as you have in the past represented Ghislaine Maxwell. As you are no doubt aware, fresh allegations have been levelled against Ms Maxwell in new US court filings made in Florida on 30 December, which some outlets have already been reported.

I would urgently seek any comment on behalf of your client, or notification of her new representation if you no longer act for her.

Many thanks for your help,
James

Draft Only



From: Ross Gow <ross@acuityreputation.com>
Sent: Friday, January 02, 2015 1:07 AM
To: G Max
Cc: Brian Basham
Subject: Fwd: URGENT – Ghislaine Maxwell

Hi Ghislaine

James Ball, investigative reporter for The Guardian, who reports on US stories, has made contact, as per below.

Please advise how you wish to handle this. I am driving all day today, but can be contacted on +44 (0) 7778 755 251

Best
Ross

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

From: James Ball <james.ball@theguardian.com>
Date: Thursday, January 1, 2015
Subject: URGENT – Ghislaine Maxwell
To: ross@acuityreputation.com

Dear Ross,

I'm writing to you as you have in the past represented Ghislaine Maxwell. As you are no doubt aware, fresh allegations have been levelled against Ms Maxwell in new US court filings made in Florida on 30 December, which some outlets have already been reported.

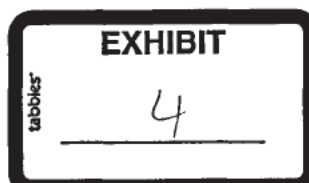
I would urgently seek any comment on behalf of your client, or notification of her new representation if you no longer act for her.

Many thanks for your help,
James

--

• James Ball • Special Projects Editor • +44 203 3533 293 • +44 7540 825 494 • @jamesrbuk •

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EXHIBIT H

This document is CONFIDENTIAL under the Court's Protective Order (DE 62)

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**PLAINTIFF'S RESPONSES AND OBJECTIONS TO DEFENDANT'S SECOND
REQUEST FOR PRODUCTION AND DEFENDANT'S INTERROGATORIES,
PLAINTIFF'S ANSWERS TO DEFENDANT'S REQUESTS FOR ADMISSION**

Pursuant to Federal Rules of Civil Procedure 26, 33, 34, Plaintiff hereby serves her responses and objections to Defendant's Second Set of Discovery Requests and serves her Answers to Defendant's Requests for Admission.

GENERAL OBJECTIONS

Defendant's Discovery Requests violate Rule 33, Fed. R. Civ. P., which provides "a party may serve on any other party no more than 25 interrogatories, including all discrete subparts" – in that Defendant has served a total of 59 interrogatories in this case, including subparts, in violation of Rule 33.

Ms. Giuffre objects to Defendant's Second Set of Discovery Requests to the extent they seek information that is protected by any applicable privilege, including but not limited to, attorney client privilege, work product privilege, joint defense privilege, public interest privilege, and any other applicable privilege.

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on hundreds (if not thousands) of matters, and collectively have well over 100 years of combined practice experience. Accordingly, a request that each of these attorneys list *all communications with the media* is facially overbroad.

Additionally, Ms. Giuffre objects to this Interrogatory because a response would cause Ms. Giuffre the incredible and undue burden of having to catalogue literally hundreds of communications that she has already produced in this case.

Moreover, Ms. Giuffre objects because this interrogatory calls for the production of documents that are irrelevant to this action and not reasonably calculated to lead to the discovery of admissible evidence. Communications with the media regarding cases that bear no relation to the subject matter of this case, from decades in the past, are facially invalid and not calculated to lead to the discovery of admissible evidence.

Ms. Giuffre additionally objects to the extent that this interrogatory seeks the communications of her attorneys, any author, reporter, correspondent, columnist, writer, commentator, investigative journalist, photojournalist, newspaper person, freelance reporter, stringer, or any other employee of any media organization or independent consultant as such interrogatory is overly broad and unduly burdensome. Furthermore, Ms. Giuffre is not obligated to produce anything currently in the possession of Defendant Maxwell or her attorneys.

Notwithstanding such objections, Ms. Giuffre has already produced her responsive communications, which are found in documents Bates labelled GIUFFRE000001 to GIUFFRE007566.

6. Identify any "false statements" attributed to Ghislaine Maxwell which were "published globally, including within the Southern District of New York" as You contend in paragraph 9 of Count I of Your Complaint, including:

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- a. the exact false statement;
- b. the date of its publication;
- c. the publishing entity and title of any publication containing the purportedly false statement;
- d. the URL or internet address for any internet version of such publication; and the nature of the publication, whether in print, internet, broadcast or some other form of media.

Response to Interrogatory No. 6:

Ms. Giuffre objects because the information interrogatory above *is in the possession of Defendant* who has failed to comply with her production obligations in this matter, and has failed to comply with her production obligations with this very subject matter. *See* Document Request No. 17 from Ms. Giuffre's Second Request for Production of Documents to Defendant Ghislaine Maxwell.¹ Maxwell has not produced all "URL or Internet addresses for any internet version of such publication" that she directed her agent, Ross Gow, to send.

¹ Request No. 17 stated: Produce all documents concerning any statement made by You or on Your behalf to the press or any other group or individual, including draft statements, concerning Ms. Giuffre, by You, Ross Gow, or any other individual, from 2005 to the present, including the dates of any publications, and if published online, the Uniform Resource Identifier (URL) address. In response, Defendant stated: "Ms. Maxwell objects to this Request on the grounds that it is cumulative and duplicative. Ms. Maxwell also objects to this Request to the extent it calls for information that exists within the public domain, the internet or in public court records and which are equally available to both parties and can be obtained from some other source that is more convenient, less burdensome, and less expensive. Ms. Maxwell further objects to this Request to the extent it seeks documents or information protected by the attorney/client privilege, the work-product doctrine, or any other applicable privilege. Ms. Maxwell is not producing documents that are available in the public domain. Ms. Maxwell has been unable to locate any additional documents responsive to this Request."

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Ms. Giuffre further objects because the information requested above *is in the possession of Defendant's agent*, who caused the false statements to be issued to various media outlets. Ms. Giuffre has not had the opportunity to depose Maxwell's agent Ross Gow; therefore, this answer remains incomplete. Consequently, Ms. Giuffre reserves the right to modify and/or supplement her responses, as information is largely in the possession of the Defendant and her agent.

Ms. Giuffre objects to this interrogatory in that it violates Rule 33 as its subparts, in combination with the other interrogatories, exceed the allowable twenty-five interrogatories. Ms. Giuffre objects to this request because it is in the public domain. Ms. Giuffre also objects in that it seeks information protected by the attorney-client/work product privilege, and any other applicable privilege stated in the General Objections.

Notwithstanding such objections, Ms. Giuffre has already produced documents responsive to this request; Bates labelled GIUFFRE000001 to GIUFFRE007566, and supplements such responsive documents with the following list of publications. While the identification of an exhaustive responsive list would be unduly burdensome, in an effort to make a good faith effort towards compliance, Ms. Giuffre provides the following examples, which are incomplete based on the aforementioned reasons:

Date	Nature	Publishing Entity	Statement/URL
January 2, 2015	Internet	Ross Gow	<p>Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.</p> <p>Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms. Roberts that Alan Dershowitz is involved in having sexual relations with her, which he denies.</p> <p>Ms. Roberts's claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory.</p> <p>Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at</p>

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			the repetition of such old defamatory claims.
January 3, 2015	Internet	Telegraph	http://www.telegraph.co.uk/news/uknews/theroyalfamily/11323872/Prince-Andrew-denies-having-relations-with-sex-slave-girl.html
January 4, 2015	Internet	Express	http://www.express.co.uk/news/world/550085/Ghislaine-Maxwell-Jeffrey-Epstein-not-madam-paedophile-Florida-court-case-Prince-Andrew
January 3, 2015	Internet	Daily Mail	http://www.dailymail.co.uk/news/article-2895366/Prince-Andrew-lobbied-government-easy-Jeffrey-Epstein-Palace-denies-claims-royal-tried-use-influence-help-billionaire-paedophile-2008-police-probe.html
January 3, 2015	Internet	Huffington Post	http://www.huffingtonpost.co.uk/2015/01/03/duke-of-york-sex-abuse-claims_n_6409508.html
January 4, 2015	Internet	Jewish News Online	http://www.jewishnews.co.uk/dershowitz-nothing-prince-andrews-sex-scandal/
January 2, 2015	Internet	Bolton News	http://www.theboltonnews.co.uk/news/national/11700192.Palace_denies_Andrew_sex_case_claim/
January 5, 2015	Internet / Broadcast	NY Daily News	http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505
January 5, 2015	Internet / Broadcast	AOL UK	http://www.aol.co.uk/video/ghislaine-maxwell-declines-to-comment-on-prince-andrew-allegations-518587500/

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Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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Meredith Schultz (Pro Hac Vice)
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University of Utah
383 University St.
Salt Lake City, UT 84112
Telephone: (801) 585-5202

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 1, 2016, I electronically sent the foregoing document to the counsel below via e-mail.

Laura A. Menninger, Esq.
Jeffrey Pagliuca, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: (303) 831-7364
Fax: (303) 832-2628
Email: lmenninger@hmflaw.com

EXHIBIT I

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**PLAINTIFF'S SUPPLEMENTAL RESPONSES TO
DEFENDANT'S INTERROGATORIES 6, 12 and 13**

Pursuant to Federal Rules of Civil Procedure 26, 33, 34, Plaintiff hereby serves her supplemental responses to Defendant's Interrogatories 6, 12 and 13.

OBJECTIONS

Plaintiff maintains and hereby incorporates by reference all applicable objections, including both general objections and specific objections to individual interrogatories, in her prior responses and objections served on Defendant in these supplemental responses.

Defendant's Discovery Requests violate Rule 33, Fed. R. Civ. P., which provides "a party may serve on any other party no more than 25 interrogatories, including all discrete subparts" – in that Defendant has served a total of 59 interrogatories in this case, including subparts, in violation of Rule 33.

Ms. Giuffre objects to Defendant's Discovery Requests to the extent they seek information that is protected by any applicable privilege, including but not limited to, attorney client privilege, work product privilege, and any other applicable privilege.

Jane Doe No. 102 v. Jeffrey Epstein, Case No. 09-80656-CIV-Marra/Johnson (Southern District of Florida). Accordingly, due to the undue burden of individually logging responsive, privileged documents related to Defendant's overly-broad requests, Plaintiff has employed categorical logging of such privileged responsive documents pursuant to Local Civil Rule 26.2(c).

Ms. Giuffre objects to the requests in that they seek to invade her privacy for the sole purpose of harassing and intimidating Ms. Giuffre who was a minor victim of sexual trafficking.

Ms. Giuffre objects to the requests to the extent they are overly broad and unduly burdensome.

Ms. Giuffre's responses to Defendant's Second Set of Discovery Requests are being made after reasonable inquiry into the relevant facts, and are based only upon the information and documentation that is presently known to her. Ms. Giuffre reserves the right to modify and/or supplement her responses. Ms. Giuffre has produced documents and information in response to these Requests.

Ms. Giuffre incorporates her above-listed general objections in the responses herein.

SUPPLEMENTAL INTEROGATORY RESPONSES

6. Identify any "false statements" attributed to Ghislaine Maxwell which were "published globally, including within the Southern District of New York" as You contend in paragraph 9 of Court 1 of Your Complaint, including:

- a. the exact false statement;
- b. the date of its publication;
- c. the publishing entity and title of any publication containing the purportedly false statement;
- d. the URL or internet address for any internet version of such publication; and
- e. the nature of the publication, whether in print, internet, broadcast or some other form of media.

In addition to her previous response, Ms. Giuffre supplements the response to include:

January 8, 2015	Internet	The Sun	https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/?CMP=spklr-128508300-Editorial-TWITTER-TheSunNewspaper-20150108-News
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12. Identify any Health Care Provider from whom You received any treatment for any physical, mental or emotional condition, including addiction to alcohol, prescription or illegal drugs, that You suffered from subsequent to the Alleged Defamation by Ghislaine Maxwell, including:

- a. the Health Care Provider's name, address, and telephone number;
- b. the type of consultation, examination, or treatment provided;
- c. the dates You received consultation, examination, or treatment;
- d. whether such treatment was on an in-patient or out-patient basis;
- e. the medical expenses to date;
- f. whether health insurance or some other person or organization or entity has paid for the medical expenses; and
- g. for each such Health Care Provider, please execute the medical and mental health records release attached hereto as Exhibit A.

Supplemental Response to Interrogatory No. 12:

Ms. Giuffre objects to this interrogatory in that it is overbroad and not limited in scope to the medical information relating to the abuse she suffered from Defendant and Jeffrey Epstein.

Pursuant to the Rules, if requested documents are not yielded in a "reasonable inquiry," Ms. Giuffre is not obligated to expend all of her time and resources on a quest to gather medical files that are unknown to her or unaccessable after reasonable inquiry. *See, e.g., Manassis v. New York City Dep't of Transp.*, No. 02 CIV. 359SASDF, 2002 WL 31115032, at *2 (S.D.N.Y. Sept. 24, 2002)

- **Medicare Australia** provided health care insurance coverage and payment for services received in Australia from July 19, 2013 through the present.⁵ Ms. Giuffre's claims history for this period is detailed at GIUFFRE007619-7620.
- **Dr. Wah Wah San**, Central Coast Family Medicine, Unit 2, 17 Anzac Rd., Tuggerah 2259, 0243518777, tel (02)4388-9540, treated Ms. Giuffre on March 14, 2013, for panic attacks as described in the medical records produced at GIUFFRE005339-5341; and possibly on September 11, 2013 for "Standard Consultation."⁶ Those records have been requested and a release sent to the provider, see GIUFFRE007625-7628.
- **CVS Pharmacy** provided prescribed medications to Ms. Giuffre as described in the records produced at GIUFFRE00843-0845. **Walgreens Pharmacy** may have provided prescribed medications to Ms. Giuffre. Those records have been requested and a release provided to the pharmacy, see GIUFFRE007611-7616.
- **Dr. Timothy D. Hartwig, D.O.** was identified in records produced by CVS pharmacy. Ms. Giuffre has requested those records, see GIUFFRE008346-8348.
- **Dr. James T. Nichols, M.D.** was identified in records produced by CVS pharmacy. Ms. Giuffre has requested those records, see GIUFFRE008349-8351.
- **Dr. Rodolfo Torres Jr., M.D.** was identified in records produced by CVS pharmacy. Ms. Giuffre has requested those records, see GIUFFRE008352-8354.

Dated: August 17, 2016.

Signed,



Virginia Giuffre

⁵ Records from Medicare Australia are generally limited to 3 years. Ms. Giuffre is continuing to pursue additional records from prior to July 19, 2013 through their offices in Australia.

⁶ Ms. Giuffre has now identified Dr. Wah Wah San and Dr. Wah San to be the same provider to the best of her knowledge. She had previously listed both names, in an abundance of caution, before learning that Dr. Wah San was the same provider as Dr. Wah Wah San.

EXHIBIT J

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRÉ,

Plaintiff,

v.

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

Declaration of Ghislaine Maxwell

I, Ghislaine Maxwell, declare as follows:

1. I am the defendant in this action.
2. I have no control or authority over any media organizations, including those media organizations that published any part of a January 2015 statement issued on my behalf at the direction of my attorney, Philip Barden.
3. Neither I nor any agent acting on my behalf approved or participated in any activity of any media organization in its decision to publish or not to publish any part of the January 2015 statement.

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

Executed on January 6, 2017.



Ghislaine Maxwell

EXHIBIT K

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. -----Λ	⋮	15-cv-07433-RWS
--	---	------------------------

Declaration of Philip Barden

I, Philip Barden, declare as follows:

1. I am a Solicitor of the Senior Courts of England & Wales based in London, England.
2. I am submitting this Declaration in support of Ghislaine Maxwell's motion for summary judgment in this action.
3. I am not authorised to and do not waive Ms. Maxwell's attorney-client privilege.
4. I have represented Ms. Maxwell since 2011 regarding the allegations made by Plaintiff Virginia Giuffre and as published in the United Kingdom. I continue to be retained in this regard. I am familiar generally with the subject matter of this action.
5. I first represented Ms. Maxwell in this matter over the weekend of 5th and 6th March 2011, about the time when various UK national newspapers, in hard copy and on line, published numerous and provocative allegations made by the Plaintiff Virginia Giuffre against Ms. Maxwell. The articles by Sharon Churcher were among those published in this time frame.
6. I instructed British press agent Ross Gow to assist me in representing Ms. Maxwell.

7. I caused to be prepared a statement to respond to the articles that appeared in the British Press over the weekend—March 5 and 6, 2011, and thereafter. I directed Mr. Gow to distribute the statements to various media outlets that had published articles.

8. On December 30, 2014, Ms. Giuffre made numerous salacious and improper allegations against Ms. Maxwell in a joinder motion publicly filed in a civil case involving Jeffrey Epstein. Shortly afterward, the British media gained access to the motion and began inquiring about Ms. Maxwell's response.

9. I continued to represent Ms. Maxwell at that time and I coordinated the response to the media. I again instructed Mr. Gow to assist me.

10. In liaison with Mr. Gow and my client, on January 2, 2015, I prepared a further statement denying the allegations, and I instructed Mr. Gow to transmit it via email to members of the British media who had made inquiry about plaintiff's allegations about Ms. Maxwell. Attached as Exhibit A1 is an email containing a true and correct copy of this statement. The statement was issued on my authority. Although it is possible others suggested or contributed content, I prepared the vast majority of the statement and ultimately approved and adopted all of the statement as my work.

11. As is evident from the timing and the typographical errors in the statement, I prepared the statement in haste. I was not in the office on 2nd January 2015 as it was the Friday immediately after New Years day which is a public holiday. Most people took 2nd January off and many business closed that day. I don't now recall where I was that day but I was hard to reach and that indicates I was out with my family. I therefore would have prepared the statement in a hurry. I recall that I wanted to get a statement out as a matter of urgency.

12. I recall that immediately after Ms. Giuffre's motion was filed, media representatives began contacting Mr. Gow and requesting Ms. Maxwell's response to Ms. Giuffre's allegations

of criminal and other misconduct by Ms. Maxwell. I believed an immediate response was imperative, even though this was happening in the midst of the holidays in the United Kingdom. My communications with Mr. Gow and with Ms. Maxwell were sporadic, delayed and hurried because of my and their own holiday schedules. I worked while on vacation and on Friday, January 2, 2015, to ensure that the statement was issued as soon as possible after receiving the media inquiries.

13. I did not ask Ms. Maxwell to respond point by point to Ms. Giuffre's factual allegations in the CVRA joinder motion. What we needed to do was issue an immediate denial and that necessarily had to be short and to the point. It should have been obvious to the media that Ms. Giuffre's new and significantly more salacious allegations had no credibility because they differed so substantially from her previous allegations, when she had the opportunity and incentive to disclose all relevant facts about being a victim of alleged sexual abuse and sex trafficking at the hands of the rich and powerful. I prepared the January 2015 statement based on my knowledge of Ms. Giuffre's past statements and her most recent statements in the joinder motion, and made the point to the media-recipients that she and her new statements, which differed so substantially from her former ones, were not credible—specifically, that the new allegations were patently false—i.e., “obvious lies.”

14. By way of example I recall that prior to the December 2014 filing of the joinder motion and the subsequent press reports that Ms. Guiffre clearly stated she had not had sex with Prince Andrew. Yet in her joinder motion she claimed she did have sex with Prince Andrew and that the sex occurred in what can only be described as a very small bathtub, too small for a man of Prince Andrew's size to enjoy a bath in let alone sex. So as of December 2014 it was clear Ms. Guiffre had made polar opposite statements. She was either lying when she said they did not have sex or when she said they did. I made the inescapable inference that she is a liar, as clearly

she is, since both statements cannot as a matter of fact be true. When someone says she did not have sex and then says she did, in other words, there is an obvious lie.

15. I did not intend the January 2015 statement as a traditional press release solely to disseminate information to the media. This is why I intentionally did not request that Mr. Gow or any other public relations specialist prepare or participate in preparing the statement. Instead, Mr. Gow served as my conduit to the media representatives who had requested a response to the joinder motion allegations and who I believed might republish those allegations.

16. My purpose in preparing and causing the statement to be disseminated to those media representatives was twofold. First, I wanted to mitigate the harm to Ms. Maxwell's reputation from the press's republication of plaintiff's false allegations. I believed these ends could be accomplished by suggesting to the media that, among other things, they should subject plaintiff's allegations to inquiry and scrutiny. For example, I noted that plaintiff's allegations changed dramatically over time, suggesting that they are "obvious lies" and therefore should not be "publicised as news."

17. Second, I intended the January 2015 statement to be "a shot across the bow" of the media, which I believed had been unduly eager to publish plaintiff's allegations without conducting any inquiry of their own. This was the purpose of repeatedly stating that plaintiff's allegations were "defamatory." In this sense, the statement was very much intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of plaintiff's obviously false allegations and the legal indefensibility of their own conduct.

18. It is important to understand that any story involving a member of the Royal Family, especially a senior member such as Prince Andrew, gains huge media attention in the UK and a story alleging he had a sex with the Plaintiff caused a feeding frenzy for the press. I wanted the

press to stop and think before publishing, to cease and desist, and that if they continued then they faced higher damages for ignoring my clear warning.

19. Consistent with those two purposes, Mr. Gow’s emails prefaced the statement with the following language: “Please find attached a *quotable statement* on behalf of Ms Maxwell” (italics supplied). The statement was intended to be a single, one-time-only, comprehensive response—quoted in full, if it was to be used—to plaintiff’s December 30, 2014, allegations that would give the media Ms. Maxwell’s response. The purpose of the prefatory statement was to inform the media-recipients of this intent.

20. Selective and partial quotation and use of the statement would disserve my purposes. It was intended to address Plaintiff’s behavior and allegations against Ms. Maxwell on a broad scale, that is to say, Plaintiff’s history of making false allegations and innuendo to the media against Ms. Maxwell. This is why the statement references Plaintiff’s “original allegations” and points out that her story “changes”—i.e. is embellished—over time including the allegations “now” that Professor Dershowitz allegedly had sexual relations with her. This is why I distinguished in the statement between Plaintiff’s “original” allegations and her “new,” joinder-motion allegations, which differed substantially from the original allegations. And this is why I wrote, “Each time the story is *re told* [sic] it *changes* with *new* salacious details about public figures and world leaders and *now* it is alleged by [Plaintiff] that Alan Derschowitz [sic] is involved in having sexual relations with her, which he denies.” (Emphasis supplied.) Having established the dramatic difference between Plaintiff’s two sets of allegations, which suggested she was fabricating more and more-salacious allegations as she had more time to manufacture them, I added the third paragraph: “[Ms. Giuffre’s] claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.” (Emphasis supplied.) I believed then, and believe now, that it was and remains a fair inference and conclusion that her claims

were and are “obvious lies.” As noted, her claims not to have slept with Prince Andrew and to have slept with Prince Andrew are a classic example of an obvious lie. One or other account is on the face of it a lie.

21. As an example of her lack of credibility, the Plaintiff made allegations against Professor Dershowitz, which I understand she has now withdrawn. Professor Dershowitz has credibility because his story, insofar as I am familiar with it, has been consistent; Ms. Giuffre has no credibility because her story has shifted and changed.

22. Further the Plaintiff’s account has become more salacious, for example, regarding Prince Andrew. The Plaintiff clearly has been seeking publicity for her story and it is clear to me that she understands retelling the same story doesn’t feed the media and generate publicity and so each time she appears to create new allegations to generate media interest.

23. I understand the Plaintiff alleged in her Complaint in this action that the following statements are defamatory. She alleges it was defamatory in the first paragraph of the January 2015 statement to state that “the allegations made by [the Plaintiff] against [Ms.] Maxwell are untrue.” For the reasons stated above, it was and is my considered and firm opinion that, in fact, her allegations are untrue. She alleges it was defamatory to state in the same paragraph that the “original allegations” have been “shown to be untrue.” For the reasons stated above, it was and is my considered and firm opinion that, in fact, her allegations are untrue. Finally, she alleges that it was defamatory in the third paragraph to state that her claims are “obvious lies.” For the reasons stated above, it was and is my considered and firm opinion that, in fact, her claims are obvious lies.

24. Both Mr. Gow and I understood that once the January 2015 statement was sent to the media-representatives, we had no ability to control whether or how they would use the statement and we made no effort to control whether or how they would use the statement.

25. It is my understanding that some of the media-recipients of the January 2015 statement did not publish any part of the statement. I am unaware of any media-recipient publishing the statement in full.

26. The issuance of the statement fully complied with my ethical obligations as a lawyer. Indeed it was duty in representing my client's interests to ensure that a denial was immediately issued. I would have been remiss if I had sat back and not issued a denial, and the press had published that Ms. Maxwell had not responded to enquiries and had not denied the new allegations; the public might have taken the silence as an admission there was some truth in the allegations.

27. The content of the statement was entirely based on information I acquired in connection with my role as counsel for Ms. Maxwell.

28. At the time I directed the issuance of the statement, I was contemplating litigation against the press-recipients as an additional means to mitigate and prevent harm to Ms. Maxwell. Whilst the limitation period for a pure defamation claim has now expired, claims are still being considered for example for publishing a deliberate falsehood, conspiracy to inure and other tortious acts.

29. In any such UK defamation, or other related, action Ms. Giuffre would be a defendant or a witness.

30. I directed that the statement indicate Ms. Maxwell "strongly denie[d] the allegations of an unsavoury nature," declare the allegations to be false, give the press-recipients notice that the publications of the allegations "are defamatory," and inform them that Ms. Maxwell was "reserv[ing] her right to seek redress."

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

Executed on January 6, 2017.



Philip Bardon

EXHIBIT L

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

VIRGINIA GIUFFRE,

Plaintiff,

vs.

GHISLAINE MAXWELL

Defendant.

VIDEO-DEPOSITION
OF:

JAMES MICHAEL AUSTRICH

TAKEN BY:

Defendant

REPORTED BY:

Karla Layfield, RMR
Stenographic Court Reporter
Notary Public
State of Florida at Large

DATE AND TIME:

June 23, 2016; 9:03 a.m.

PLACE:

Owen & Associates Court Reporters
108 N. Magnolia Avenue, Suite 501
Ocala, Florida

APPEARANCES:

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Also Present: Kenneth Sarsony, Videographer
Virginia Giuffre

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(Exhibits attached.)

1 Broward and Miami a lot.

2 Q Okay. Where did you go to high school?

3 A Robert Morgan.

4 Q Which city is that in?

5 A I guess Miami.

6 Q Okay. When did you graduate?

7 A '98.

8 Q How old are you now?

9 A 35.

10 Q When is your birthday?

11 A [REDACTED].

12 Q Do you remember a woman by the name of Virginia
13 Roberts?

14 A Yes.

15 Q And do you see her here in the room today?

16 A Yes.

17 Q When was the last time that you saw her?

18 A Sixteen years ago.

19 Q How did you meet Ms. Roberts?

20 A She was a friend of my sister's, and that's how
21 I met her.

22 Q What is your sister's name?

23 A [REDACTED] (phonetic). Last name is spelled
24 [REDACTED] but I still can't spell it. My step-sister.

25 But after so long, she's basically my sister.

1 Q Okay. Where is Ms. [REDACTED] now?

2 A I believe Broward County.

3 Q How is it that she came to introduce you to
4 Ms. Roberts?.

5 A She brought her to the house.

6 Q And do you know how they were friends?

7 A They met each other in rehab.

8 Q What kind of rehab?

9 A I'm not sure. I was living in Miami at the
10 time, and I only came up once in a while to visit her. At
11 the very end, when I moved back to Broward with my dad,
12 that's when [REDACTED] home.

13 Q Do you know the name of the rehab program?

14 A No.

15 Q And you do you know what the rehab program was
16 for, drugs, alcohol?

17 A I don't know. I guess, everything probably.

18 Q Do you recall approximately what year you met
19 Ms. Roberts?

20 A I believe around '98.

21 Q How old were you at that time?

22 A 18.

23 Q Do you know how old Ms. Roberts was?

24 A 15 or 16, I believe.

25 Q Was she approximately your sister's age?

1 working at the Taco Bell in Sunrise. Did I get that
2 right?

3 A Yeah, yeah.

4 Q Okay. Did Ms. Roberts come to work at the Taco
5 Bell where you worked?

6 A Not at that one in Sunrise. When we moved to
7 Broward, she worked with me. I think it was another one
8 in Sunrise.

9 Q Okay. So you're saying sometime later you and
10 Ms. Roberts moved to Broward. Is that right?

11 A Yes, we lived in an apartment.

12 Q Where was that apartment?

13 A Oakland Park, I believe.

14 Q And when you moved to that apartment in Oakland
15 Park, that's when she came to work with you at Taco Bell?

16 A Yes.

17 Q Do you know about how old you were when that
18 happened?

19 A It had to be around -- it wasn't long after
20 meeting her.

21 Q Why don't you take a step back and tell me what
22 you recall about meeting Ms. Roberts.

23 A It was a long time ago.

24 Q I understand.

25 A All I remember is my sister bringing her over

1 one day, we got to talking, we liked each other, and we
2 just got to know each other.

3 Q Was she in school at the time?

4 A No.

5 Q Why not?

6 A I'm not entirely sure.

7 Q Was she done with this rehab program?

8 A Yes, at the time.

9 Q Did she go back into it later?

10 A Not that I know of.

11 Q So your understanding is, she was not in school
12 and not in the rehab program at the time that you met
13 Ms. Roberts. Correct?

14 A Not that I know of, no.

15 Q Where was she living when you met Ms. Roberts?

16 A She was staying with us -- or she came over, and
17 then I guess she was staying with us for a little while, I
18 believe.

19 Q And who do you mean by "us"?

20 A At my dad's house.

21 Q Who else was living there besides yourself, your
22 dad and your sister?

23 A My step-mom, my other step-sister, my
24 step-brother and their grandmother. It was a big house.

25 Q How long do you recall Ms. Roberts living at

1 that house with the family?

2 A No idea. Not long.

3 Q Weeks, months, years?

4 A Weeks.

5 Q Okay. You said that you spent some time getting
6 to know Ms. Roberts when you first talked to her?

7 A Uh-hmm.

8 Q Did she tell you anything about her childhood?

9 A If she did, I don't remember, it was so long
10 ago.

11 Q Do you recall meeting her parents?

12 A Yes.

13 Q Was that some time later?

14 A Yes.

15 Q Tell me about when you remember meeting her
16 parents.

17 A I think that was -- all I remember -- really,
18 all I remember is going to the house and meeting her
19 parents. I don't remember much from that time.

20 Q Okay. I appreciate that this is all a long time
21 ago

22 A Yeah.

23 Q Did you and Ms. Roberts become a couple soon
24 after you met her?

25 A Yes.

1 Q Was she dating anyone else at that time?

2 A No.

3 Q Tell me where you -- did you both move out of
4 that home, your dad's home, together?

5 A Yes.

6 Q And where did you go directly after that home?

7 A To the Oakland Park apartment.

8 Q At the time you got the Oakland Park apartment,
9 do you recall how old you were?

10 A I had to be 18 to get an apartment.

11 Q Okay. And do you know how old Ms. Roberts was?

12 A 16.

13 Q Is that a guess, or do you remember?

14 A That's a guess.

15 Q Do you think you are about two years older than
16 she is?

17 A About. Maybe a little more.

18 Q Okay. How long did you two live together at the
19 Oakland Park apartment?

20 A Less -- I know it wasn't a full year. I don't
21 know exactly how long it was. I don't know how many
22 months it was.

23 Q Did anyone else live there with you?

24 A Yes, a roommate.

25 Q Who was that?

1 A Mario. Last name, I can't remember. I haven't
2 seen him since that apartment.

3 Q Was he a friend of yours or hers, or just
4 someone else?

5 A He was a friend of mine. He worked with me at
6 Taco Bell.

7 Q And after you moved to this Oakland Park
8 apartment, Ms. Roberts came to work at the Taco Bell as
9 well?

10 A Yeah, with him and me.

11 Q Do you recall where that Taco Bell was?

12 A By the Sawgrass Mall.

13 Q How long did Ms. Roberts work at that Taco Bell?

14 A I don't remember.

15 Q You were a manager at the time?

16 A Yes, me and my roommate.

17 Q You were both managers?

18 A Yeah.

19 Q Was she an official employee?

20 A Yes.

21 Q She was on the payroll?

22 A Yes.

23 Q And you were the manager?

24 A Um-hmm?

25 Q And she paid -- she was paid for by Taco Bell?

1 A Yes.

2 Q Was it is a franchise, if you know?

3 A I know when I first started there, they were
4 corporate, but then they were a franchise. They were
5 bought out. But I'm not sure if when I got there they
6 were a franchise or not.

7 Q Got it.

8 Do you know if Ms. Roberts had any previous
9 employment before she worked at Taco Bell?

10 A I think by the apartment, she worked for KFC for
11 a little while.

12 MS. MENNINGER: Are you looking at Ms.
13 Roberts?

14 THE WITNESS: I'm thinking. I can't
15 remember. I remember something with KFC. They
16 had one really close to us. I think she worked
17 there for a tiny, tiny bit. I'm not sure.

18 MS. MENNINGER: Okay.

19 BY MS. MENNINGER:

20 Q Before the Taco Bell?

21 A Or she could've applied there. It's just in my
22 head. She might have just applied there, and didn't get
23 it, and that's why I brought her to Taco Bell.

24 Q Okay.

25 A Because we were both the night managers.

1 Q Okay. Got it.

2 So for not a full year, the two of you worked
3 together at a Taco bell near the Sawgrass Mills (as
4 heard) and lived in an apartment in Oakland Park?

5 A Yes.

6 MR. EDWARDS: Object to the form.

7 BY MS. MENNINGER:

8 Q With Mario?

9 A Yeah.

10 Q Did Mario live there the whole time?

11 A Yes.

12 Q What caused you to stop living at the Oakland
13 Park apartment?

14 A I don't remember exactly. But I know we moved
15 out before, and Mario stayed in the apartment.

16 Q Where did you move to?

17 A Her parent's house.

18 Q Did you move into the house or to someplace near
19 the house?

20 A I don't remember if we originally moved into the
21 house. But I know they had a trailer in the back that we
22 lived in.

23 Q How long did you live in the trailer in the
24 back?

25 A No idea.

1 A No.

2 Q Do you know about what years this was?

3 A Not really.

4 Q Do you know about how old you were?

5 A When, what?

6 Q I'm just focused on the period of time in which
7 you were living at her parent's house in the trailer.

8 A I was probably 18 when we moved in there.

9 Q And you said you were only there for a couple of
10 months?

11 A Not that I remember. Like, it might have been a
12 little longer. I'm not sure.

13 Q Were you engaged to Ms. Roberts?

14 A Yes.

15 Q When did you become engaged to her?

16 A When we were living in Oakland Park.

17 Q Tell me about the engagement. How did it come
18 about?

19 A Well, we fell in love, and -- I believe it was
20 Valentine's Day when I proposed.

21 Q Did you have a ring?

22 A Yes.

23 Q Did she accept?

24 A Yes.

25 Q How long were you engaged?

1 A I'm not entirely sure.

2 Q Do you remember an event where the engagement
3 was broken off?

4 A When I left.

5 Q Left where?

6 A When I left -- Royal Palm Beach, I guess, was
7 our apartment.

8 Q When you left that apartment, that's when the
9 engagement was over in your mind?

10 A Yes.

11 Q Were your families happy about the engagement?

12 A Yes. My mother was. My dad wasn't too happy.

13 Q Have you ever been married since then?

14 A No.

15 Q Have you ever been engaged since then?

16 A No.

17 Q Do you know what happened to the ring?

18 A Yes.

19 Q Where is it?

20 A I have it.

21 Q Still?

22 A Yeah. It was my grandmother's.

23 Q Did you get down on one knee?

24 A Yes, at the beach, I believe.

25 Q When you were living in Oakland Park, in this

1 Q So from about the ages you were 18 to 20 is when
2 you were living together with Virginia?

3 A Yeah.

4 Q And between the time you met her at your dad's
5 house and the time that you broke up, did you guys break
6 up and get back together, or was it one consistent
7 relationship, and then it had an end date?

8 A Yeah, one consistent relationship.

9 Q Okay. You mentioned that you moved into an
10 apartment in Royal Palm Beach?

11 A Yeah, I believe that's where it was, Royal Palm
12 Beach.

13 Q Do you remember anything about the apartment?

14 A All I remember, it was on the third floor.

15 Q And who got that apartment?

16 A I did.

17 Q Again, you were over 18 at that time?

18 A Yes.

19 Q So you got the lease?

20 A Yes.

21 Q Do you remember looking for the apartment?

22 A I believe so.

23 Q And it wasn't the first apartment you rented,
24 right?

25 A No. No, the one in Oakland Park was the first

1 one I rented.

2 Q Okay.

3 MS. MENNINGER: I'm going to show you some
4 photographs. If I could have you mark this. I
5 guess we'll start again with, I guess we'll start
6 again with Defendant's Exhibit -- I got one for
7 you. Defendant's Exhibit 1 or A, whatever you put
8 on it.

9 THE COURT REPORTER: 1.

10 MS. MENNINGER: Exhibit 1.

11 (Defendant's Exhibit 1, photograph, was
12 marked for identification.)

13 BY MS. MENNINGER:

14 Q Please take a look at this. There are two
15 photographs stapled together.

16 Does that look like the apartment that you
17 lived in on the third floor?

18 A It could be. I don't really remember it.

19 Q The address on this is 368 Bent Oak. Does that
20 sound about right?

21 A Bent Oak sounds familiar.

22 Q You don't recognize the -- it may have been
23 painted, for example?

24 A Yeah. I mean, all I remember is being on the
25 third floor.

1 MS. MENNINGER: I'm going to show you another
2 exhibit. Let me find it. We'll mark this
3 Defendant's Exhibit 2.

4 (Defendant's Exhibit 2, passport, was marked
5 for identification.)

6 BY MS. MENNINGER:

7 Q I know this is not terribly easy to read, but
8 it's a passport application that has been previously
9 identified in this case. And in the middle section,
10 there's emergency contact information that says "James
11 Austrich".

12 Do you see that?

13 A Yes.

14 Q Is that you?

15 A Yes.

16 Q And it says 368 Bent Oak Drive below that?

17 A Yes.

18 Q Does that refresh your memory as to the address,
19 the apartment that you lived in in Royal Palm Beach?

20 A Like I said, Bent Oak sounds very familiar, and
21 I know it was Royal Palm Beach. So possibly it was that
22 one.

23 Q Okay. And how long do you think that you lived
24 in this apartment?

25 A I'm not entirely sure. Less than a year, that's

1 MS. MENNINGER: I'm going to mark this
2 exhibit as Defendant's Exhibit 3.

3 (Defendant's Exhibit 3, Citation Tracking
4 Report, was marked for identification.)

5 BY MS. MENNINGER:

6 Q I'm going to have you take a look at this.
7 Actually, I apologize because I need you to turn back
8 several pages to -- the lower right-hand corner has some
9 page numbers that say G.M. And I need you to go to 781.

10 A (Witness complies.)

11 Q Could I have you take a look at the narrative
12 section of that page. If you want to just read that
13 paragraph.

14 A "John Perkins," I don't even know that name.

15 MS. MENNINGER: I guess you guys haven't kept
16 in touch.

17 MR. EDWARDS: He was scared that day.

18 THE WITNESS: (cont'd) Plus, when I left
19 there, I didn't really talk to anybody from up
20 there. I remember somewhat of that. Yeah, I
21 remember the cops telling me even though it was
22 under my name, I couldn't go in. And I think
23 later on then they got out so I could go back and
24 get me stuff. I think I was going to see my
25 animals.

1 BY MS. MENNINER:

2 Q Yeah. I didn't know if reading this might cause
3 you to remember some things.

4 A I somewhat remember that. I remember the cops
5 coming and telling me I wasn't allowed to go in my own
6 apartment that was under my name.

7 Q Okay. So this is dated June 10th, of 2001. And
8 it places you at 368 Bent Oak Drive, correct?

9 A Yes.

10 Q Okay. Do you understand that to likely be where
11 you were living with Ms. Roberts?

12 A Yeah. But at the time I was already back in
13 Broward.

14 Q Okay. Do you know how long you had been back in
15 Broward?

16 A Not a clue.

17 Q And in this, it refers to Ms. Roberts as your
18 ex-fiancé, correct?

19 A Yes.

20 Q So presumably the event you described where you
21 had a fight and left had already occurred?

22 A Yes.

23 MR. EDWARDS: Form.

24 THE WITNESS: I know I was already out of
25 there. And that's why when I went back, that's

1 when the cops said I couldn't go in my own
2 apartment.

3 BY MS. MENNINGER:

4 Q So your recollection today is that you were
5 returning to that apartment to either get things or check
6 on pets?

7 A Yes.

8 Q What pets do you recall having?

9 A A dog and six cats and, I believe, ferrets and
10 rabbits. One reason we got along so well is because we
11 liked animals.

12 Q And do you remember going back to the apartment
13 to check on the pets and encountering Ms. Roberts and
14 Tony?

15 A Yeah.

16 Q Were you inside the apartment when you
17 encountered them?

18 A No, outside.

19 Q Did you understand them to be living in the
20 apartment at that time?

21 A Yes.

22 Q In the police report it says "Austrich stated
23 his ex-fiance, Virginia Roberts, who also resides at the
24 above-listed address, brought her friend to the
25 apartment."

1 A I believe that was Tony.

2 Q Okay. And at this time, the police are
3 indicating that you both lived there. But that's not what
4 you remember?

5 A No. They wouldn't even let me -- all I
6 remember -- I remember being outside the door and the cops
7 wouldn't let me go in there because -- even though it was
8 my apartment and my address was on the thing, I wasn't
9 allowed in there. Because I'm pretty sure I wasn't living
10 there. I just came back to get something.

11 Q Do you know how long after you left you were
12 coming back to get something?

13 A I don't remember.

14 Q If you left your pets there, I guess, I'm just
15 wondering whether you intended to go back and get your
16 pets?

17 A I couldn't because my dad didn't -- my dad
18 didn't really take -- like, he didn't want all those
19 animals. Because he already had three dogs and he wasn't
20 a fan of cats.

21 MR. EDWARDS: Or ferrets.

22 A (cont'd) Or ferrets or rabbits. I think we had
23 a gerbil, mice, rats, all kinds of stuff. I know we had
24 pet store cages that we bought to keep them all in.
25 Because when we lived in West Palm Beach it was like a

1 little animal rescue for a while.

2 Q Did you get that stuff from the pet store where
3 you both had worked?

4 A Yes.

5 Q A discount, I hope?

6 A I feel like every time I went to the pet store,
7 I got a new animal. Still do the same thing.

8 Q Do you have pets today?

9 A Oh, yeah. I have dogs. I have two dogs. We
10 have six cats and three birds.

11 Q No reptiles?

12 A No. No, I don't really like ---

13 Q Is that a different kind of pet owner?

14 A Well, I had reptiles in West Palm Beach. They
15 are too hard to take care of.

16 Q Spiders?

17 A No, I don't want to be -- I have enough spiders
18 where I live. I don't need pet spiders.

19 Q Okay. All right.

20 Do you remember Tony punching you in the
21 face?

22 A I don't remember.

23 Q You see that's what the police report says?

24 A Yeah, yeah, yeah. He might have. I don't
25 remember.

1 Q And the police observed you to have minor
2 swelling and a large red mark. Does that sound accurate?

3 A From according to what it says, yeah. I don't
4 really remember that. I remember being at the door and
5 the cops coming and telling me I can't go in there. Once
6 I read that, that's really all I remember.

7 Q Do you believe that whatever altercation you had
8 took place within the apartment or outside the apartment?

9 A In the doorway at the most. I never went inside
10 that apartment when that was happening, not I remember.

11 Q Do you ever get to see those pets again?

12 A Yes. I think later on, they both left for the
13 day and let me go in and see my pets.

14 Q Now, this indicates that the police were there
15 at about 9:20 in the evening, and you were there with
16 Mr. Perkins. But you don't remember Mr. Perkins?

17 A No. If it would have said "Josh" I think that
18 might be a name I remember. But John -- I know we had two
19 friends up there. John could have been one of them, but I
20 don't really remember. John Perkins. That's so weird.

21 Q The police report also indicates that
22 Mr. Figueroa observed Perkins on the telephone and fled
23 the scene prior to arrival. Do you remember that?

24 A No. I don't remember "Perkins". As soon as I
25 saw that name, I'm like "Who the hell is John Perkins?"

1 Q All right. If you can turn to the next page.
2 The police report continues that they made numerous
3 attempts to contact you and Mr. Perkins, whoever he is --

4 A Yeah.

5 Q -- and Ms. Roberts at the residence or on the
6 phone, but had not been able to do that?

7 A If they called the residence, I wasn't living
8 there. And I don't remember them ever trying to call me
9 in Broward.

10 Q Do you know if you had a cell phone? This was
11 back in '01. I don't even know if I had a cellphone in
12 '01?

13 A Yeah, I really couldn't tell ya'.

14 Q Okay. So your best recollection, after
15 reviewing this report, is that you had left on a previous
16 date and came back on this date to see your pets?

17 A Yeah, yeah.

18 Q And that you were ultimately able to get in and
19 see the pets?

20 A Later on, yes.

21 Q Okay. Like, the same day or --

22 A Later on. I don't really remember how much
23 longer --- how many days later, or something. Not too
24 long.

25 Q And when you came back at that later time, you

1 did not encounter Ms. Roberts?

2 A No, nobody was in the house but my animals.

3 Q And since that time you have not had any contact
4 with Ms. Roberts?

5 A No.

6 Q Okay. What was your opinion of Tony?

7 MR. EDWARDS: Form.

8 THE WITNESS: An idiot. That's all I really
9 remember.

10 BY MS. MENNINGER:

11 Q Did you believe him to be using drugs?

12 A Yes.

13 Q Do you know what kind?

14 A Whatever he could get.

15 Q When Ms. Roberts started hanging out with Tony
16 again, did you then believe her to be using drugs?

17 A Yes.

18 MR. EDWARDS: Form.

19 BY MS. MENNINGER:

20 Q What caused you to have that belief?

21 A Actions.

22 MR. EDWARDS: Same objection.

23 BY MS. MENNINGER:

24 Q What kinds of actions?

25 A I don't remember. All I remember is that's what

1 A Sorry.

2 Q You're still under oath, do you remember?

3 A Yes.

4 Q Okay. So you were referring a little bit to the
5 time that Ms. Roberts worked for Jeff?

6 A Yes.

7 Q You knew him as Jeff or Jeffrey?

8 A I remember Jeff. It could have been Jeffrey.

9 Q Okay. Tell me what you recall about Ms. Roberts
10 going to work for Jeff.

11 A I don't remember much of it, really. All I
12 remember is that she went to work for him. I know they
13 went to some island. I know they traveled around. And he
14 had a house in Palm Beach I think it was.

15 Q Did she tell you what she was doing for Jeff?

16 A At the beginning, it was massage. That's what I
17 was told.

18 Q By her?

19 A Yes.

20 Q Okay. Did she seem excited about that job?

21 A Yes.

22 Q Was she getting paid more money?

23 A Yes.

24 Q Do you know how much?

25 A No. A lot more.

1 Q So she hadn't come to you before that and said,
2 "Hey, I'm having to do something other than massages"?

3 A I don't remember.

4 Q She may have; she may not have?

5 A Yeah. I don't remember.

6 Q Well, why would you be fighting about it at the
7 end?

8 A Well, that's because she was messing with Tony,
9 the idiot.

10 Q So the fight --

11 A I mean, that's what he -- the fight's what
12 brought everything out.

13 Q Okay. So she was messing with Tony, the idiot,
14 and you guys got in a fight about her messing with Tony?

15 A I think that's what it originally it was.
16 Because she was supposed to come home, and I think she
17 went over there instead. That's when I found out --
18 that's when I found out about that, with the idiot. Then,
19 I believe the other stuff came to light. I don't really
20 remember.

21 Q As you sit here, you think that's when you were
22 finding out about all of this at the same time?

23 A I believe so, but I don't really remember.

24 Q Do you know where Tony lived?

25 A Somewhere around there, where our other

1 Q You had trouble figuring out what was the truth?

2 A Yeah. But I know for sure she was with the
3 idiot, so that's the main reason.

4 Q Well, you saw her with him, right?

5 A Well, I found out that she was in town, but not
6 here, and that's when I found out.

7 Q Okay. Not at home -- not at your home?

8 A Yeah.

9 Q When you believed yourself to be engaged?

10 A Yes.

11 Q Okay. She was not truthful with you about her
12 whereabouts?

13 MR. EDWARDS: Object to the form.

14 THE WITNESS: Yes.

15 BY MS. MENNINGER:

16 Q And you confirmed that in some fashion?

17 A Yes.

18 Q When another problem arose at the apartment, the
19 police were called, correct?

20 MR. EDWARDS: Form.

21 THE WITNESS: Other than that?

22 BY MS. MENNINGER:

23 Q With Mr. Perkins?

24 A I don't -- all I remember is that one time.

25 Q I just did a really bad question, so let me try

1 about being forced to do things --

2 A No. She might have told me some stuff, but
3 what, I don't remember really. Who knows if it was the
4 truth at the time anyway.

5 Q And you weren't doing drugs at that time?

6 A I wouldn't say no. I know at the end, I was
7 smoking a lot. And I might have been doing some other
8 stuff. I'm not sure.

9 Q Okay. Regardless, you would not have been
10 comfortable believing your fiancé was having sex with
11 other people?

12 A No.

13 Q Did she, Ms. Roberts ever tell you that she was
14 posing naked for photographs?

15 A No.

16 Q Would you have been okay with her posing naked
17 for photographs?

18 A No.

19 Q Did Ms. Roberts ever mention Ghislaine Maxwell,
20 my client?

21 A If she did, I don't remember the name. Like I
22 said, I only remember Jeff. That name is all I really
23 remember.

24 Q Because you don't remember Ms. Maxwell's name, I
25 assume you don't remember Ms. Roberts telling you that

C E R T I F I C A T E

STATE OF FLORIDA

COUNTY OF MARION

I, Karla Layfield, RMR, Stenographic Court Reporter, do hereby certify that I was authorized to and did stenographically report the foregoing deposition of James Michael Austrich; that said witness was duly sworn to testify truthfully; and that the foregoing pages, numbered 1 through 145, inclusive, constitute a true and correct record of the testimony given by said witness to the best of my ability.

I FURTHER CERTIFY that I am not a relative or employee or attorney or counsel of any of the parties hereto, nor a relative or employee of such attorney or counsel, nor am I financially interested in the action.

WITNESS MY HAND this ___ day of June, 2016, at Ocala, Marion County, Florida.

Karla Layfield, RMR
Stenographic Court Reporter

1 CERTIFICATE OF OATH

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, the undersigned authority, certify that James
5 Michael Austrich personally appeared before me and was
6 duly sworn on the 23rd day of June, 2016.

7 WITNESS MY HAND AND OFFICIAL SEAL this _____ day
8 of June, 2016.

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Karla Layfield, RMR
Notary Public
State of Florida at Large
My Commission No. FF942806
My Commission Expires 12/10/2019

____ Personally Known

____ Professionally Known

X Produced Identification of FDL

Exp. 07/9/80

EXHIBIT M

UNITED STATES DEPARTMENT OF STATE
APPLICATION FOR ☐ PASSPORT ☐ REGISTRATION
(Type or print all capital letters in blue or black ink in white areas only)

1. NAME (First and Middle)
NIRGINIA Lee

LAST
ROBERTS

2. MAIL PASSPORT TO: STREET / RD # OR P.O. BOX
[REDACTED] APT. #
[REDACTED] STATE
LOXAHATCHEE FL

ZIP CODE
33470 COUNTRY / IN CARE OF (if applicable)
USA

3. SEX ☐ M ☒ F 4. PLACE OF BIRTH (City & State or City & Country)
SACRAMENTO California

5. DATE OF BIRTH
[REDACTED] 6. SOCIAL SECURITY NUMBER
[REDACTED] Personal Information

7. HEIGHT
5' 10" 8. HAIR COLOR
Blonde 9. EYE COLOR
Blue Green

10. BUSINESS OCCUPATION
[REDACTED] 11. BUSINESS ADDRESS
[REDACTED] STATE
FL ZIP CODE
33470

12. PERMANENT ADDRESS (DO NOT LIST P.O. BOX)
[REDACTED] CITY
LOXAHATCHEE STATE
FL ZIP CODE
33470

14. FATHER'S FULL NAME
Last First Middle ROBERTS SKY BIRTHPLACE
California 15. MOTHER'S FULL MAIDEN NAME (BIRTHPLACE)
Last First Middle LION RUDIN BIRTHPLACE
California

16. HAVE YOU EVER BEEN MARRIED? ☐ Yes ☒ No 17. OTHER NAMES YOU HAVE USED
[REDACTED]

18. HAVE YOU EVER BEEN ISSUED A U.S. PASSPORT? ☐ Yes ☒ No 19. COMPLETE NEXT LINE AND SUBMIT PASSPORT IF AVAILABLE
APPROXIMATE ISSUE DATE
Month Day Year [REDACTED]

NAME IN WHICH ISSUED
[REDACTED]

20. TRAVEL PLANS (not mandatory)
Month Day Year
Exp. 01/11/01
Length of trip 01/21/01
COUNTRIES TO BE VISITED
London, VA, etc.

21. STOP - DO NOT SIGN APPLICATION UNTIL REQUESTED TO DO SO BY PERSON ADMINISTERING OATH.
I have not, since acquiring United States citizenship, performed any of the acts listed under "Acts or Conditions" on the reverse of this application form. I solemnly swear or affirm that the statements made on this application are true and the photograph attached is a true likeness of me.

22. FOR ACCEPTANCE AGENT'S USE
Subscribed and sworn to (affirmed) before me
FOIA: (b)(6)
[Signature of person authorized to accept application]

23. APPLICANT'S IDENTIFYING DOCUMENTS
☒ DRIVER'S LICENSE
☐ PASSPORT
☐ OTHER (Specify)
ISSUE DATE 05/21/00 EXPIRATION DATE 05/21/05
PLACE OF ISSUE FL ISSUED IN THE NAME OF VIRGINIA ROBERTS

24. FOR ISSUING OFFICE USE ONLY (Applicant's evidence of citizenship)
☐ Birth Certificate
☐ Passport
☐ Report of Birth
☐ Naturalization/Citizenship Cert.
☐ Other
☐ Seen & Returned
☐ Attached
FOIA: (b)(6)

25. Fee
FEES 45 EXEC 25 ET 35 OTHER

EXHIBIT N

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE

May 3, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

FAMER, JAFFE, WEISSING, EDWARDS, FISTOS &
LEHRMAN, P.L.

By Brad Edwards, Esq.
425 N. Andrews Avenue
Suite 2
Fort Lauderdale, FL 33301
Phone: 954.524.2820
brad@pathtojustice.com
Appearing on behalf of the
Plaintiff

BOIES, SCHILLER & FLEXNER LLP

By Sigrid S. McCawley, Esq. (For Portion)
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Phone: 954.356.0011
smccawley@bsfllp.com
Appearing on behalf of the
Plaintiff

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.

By Laura A. Menninger, Esq.

3 Jeffrey S. Pagliuca, Esq.

150 East 10th Avenue

4 Denver, CO 80203

Phone: 303.831.7364

5 lmenninger@hmflaw.com

jpagliuca@hmflaw.com

6 Appearing on behalf of the

7 Defendant

Also Present:

8 Brenda Rodriguez, Paralegal

9 Nicholas F. Borgia, CLVS Videographer

Pursuant to Notice and the Federal Rules
of Civil Procedure, the VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE, called by Defendant, was taken on
Tuesday, May 3, 2016, commencing at 9:00 a.m., at 150
East 10th Avenue, Denver, Colorado, before Kelly A.
Mackereth, Certified Shorthand Reporter, Registered
Professional Reporter, Certified Realtime Reporter
and Notary Public within Colorado.

* * * * *
I N D E X

EXAMINATION	PAGE
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PRODUCTION REQUEST(S):	
(None.)	

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1 January 19th, 2015?

2 A At the very top of the page it says
3 January 21st, 2015.

4 Q The date it was filed. Is there a date
5 just above the signature block?

6 A Oh, yes, sorry. Yes, there is.

7 Q And what date -- what date was that?

8 A The 19th day of January, 2015.

9 Q Okay. And this document is something that
10 you believe contains the truth, correct?

11 A To the best of my knowledge at the time,
12 yes.

13 Q All right. Did something change between
14 the time then and today that makes you believe that
15 it's not all accurate?

16 A Well, as you can see, in line 4 on page 1,
17 I wasn't aware of my dates. I was just doing the
18 best to guesstimate when I actually met them.

19 Since then I've been able to find out that
20 through my Mar-a-Lago records that it was actually
21 the summer of 2000, not the summer of 1999.

22 Q Oh, I'm sorry. Are you back on page 1?

23 A On the first page.

24 Q Okay.

25 A Yes.

1 Q And you're talking about line 4?

2 A Line 4.

3 Q Paragraph 4 or line 4?

4 A Oh, sorry. Number 4, the paragraph
5 number 4.

6 Q Okay. And what part of paragraph 4 do you
7 now believe to be untrue?

8 A In approximately --

9 MR. EDWARDS: Object to the form.

10 You can answer.

11 A In approximately 1999 when I was 15 years
12 old I met Ghislaine Maxwell.

13 Q (BY MS. MENNINGER) Okay.

14 A I now know that it was 2000, that I was 16
15 years old when I met Ghislaine Maxwell.

16 Q So when you signed this document under
17 penalty of perjury stating that it was true, you no
18 longer believe that to be true, correct?

19 A It was an honest mistake. We had no idea
20 how to pinpoint without any kind of records or dates
21 or anything like that. I was just going back
22 chronologically through time. And that's the best
23 time that I thought it was. And now I know the
24 facts, so it's good to know.

25 Q So you now believe that a document you

1 filed under oath is no longer true, correct?

2 MR. EDWARDS: Object to the form.

3 A I wouldn't say that it wasn't true. I was
4 just unaware of the times and the dates.

5 Q (BY MS. MENNINGER) Again, is there more
6 than one truth, Ms. Roberts?

7 A No, there's no more than one truth.

8 Q All right. So a document in which you
9 swore that you were 15 years old when you met
10 Ms. Ghislaine Maxwell is an untrue statement,
11 correct?

12 MR. EDWARDS: Object to the form.

13 A It's not that it's an untrue statement.
14 It was a mistake. So it wasn't intentionally trying
15 to say something that wasn't true. It was to my best
16 knowledge that I thought it was 1999. And when I got
17 my records from Mar-a-Lago I was able to find out
18 that it was 2000. And this was entered before I
19 found out the actual dates that I did work at
20 Mar-a-Lago.

21 Q (BY MS. MENNINGER) Okay. So a document
22 that you filed under oath --

23 A Um-hum.

24 Q -- is now, you believe to be untrue,
25 correct?

1 MR. EDWARDS: Objection. Asked and
2 answered.

3 Q (BY MS. MENNINGER) You may answer.

4 MR. EDWARDS: Answer again.

5 A Again, I wouldn't say it's untrue. Untrue
6 would mean that I would have lied. And I didn't lie.
7 This was my best knowledge at the time. And I did my
8 very best to try to pinpoint time periods going back
9 such a long time ago.

10 It wasn't until I found the facts that I
11 worked at Mar-a-Lago in 2000 that I was able to
12 figure that out.

13 Q (BY MS. MENNINGER) And approximately when
14 did you learn those facts about the dates you worked
15 at Mar-a-Lago?

16 A I would say it was mid-2015.

17 Q Mid-2015 is the first time you became
18 aware of the dates --

19 A I don't know the exact --

20 Q If you could just let me finish.

21 A I'm sorry.

22 Q That's all right. Approximately mid-2015
23 when you learned the true dates that you had worked
24 at Mar-a-Lago?

25 A That's correct. Sorry.

1 a lot of the circumstances that I had been subjected
2 to, I decided I wanted to get my GED.

3 Q Okay. So you were going to an actual
4 school to get your GED, that's what you're saying?

5 A Yes.

6 Q And that school, whatever it was, where
7 you were getting your GED was not Palm Beach High
8 School, right?

9 A No.

10 Q And it -- whatever the school was where
11 you were getting your GED took a summer break?

12 A I believe so, yes.

13 Q And that was in 2000?

14 A Now that we know the right dates, yes.

15 Q And that's when your dad helped you get a
16 quote-unquote summer job?

17 A Yes.

18 Q All right. And that summer job was
19 Mar-a-Lago?

20 A Yes.

21 Q Okay. Now tell me how you sort of came
22 into Mar-a-Lago for the first time? He asked you to
23 come? They called you? What happened?

24 A My dad was very liked there. So I think
25 he talked to the people who were in HR. And then

1 mic higher up on your jacket, please?

2 THE DEPONENT: Sure.

3 THE VIDEOGRAPHER: Thank you.

4 THE DEPONENT: Tell me if that's okay.

5 Better?

6 A Okay. Page 40?

7 Q (BY MS. MENNINGER) Right. Do you see the
8 first full paragraph on that page?

9 A I do.

10 Q The first line begins: I spent my sweet
11 16th birthday on his island in the Caribbean next to
12 Little (sic) St. James Isle. He liked to call it
13 Little St. Jeff's. His ego was enormous as his
14 appetite for fornicating.

15 Do you see that sentence?

16 A I do.

17 Q That is not true, correct? You were not
18 spending your sweet 16th birthday on Little St. James
19 Isle, correct?

20 A Based on my knowledge at the time that I
21 wrote this manuscript, I thought I did spend my 16th
22 birthday there. And so I put it down in there as
23 that. Now I know that it wasn't my 16th birthday.

24 Q Or your sweet 16th birthday?

25 A Well, we --

1 MR. EDWARDS: Object to the form.

2 Harassing.

3 Q (BY MS. MENNINGER) Was it your sweet 16th
4 birthday?

5 A Is it not custom to call your 16th
6 birthday sweet? Have you never heard that saying
7 before?

8 Q Was it your sweet 16th birthday,
9 Ms. Giuffre?

10 A As we --

11 MR. EDWARDS: She's answered the question.
12 It's been asked and answered.

13 MS. MENNINGER: She asked me a question,
14 actually. You're not testifying here.

15 Q (BY MS. MENNINGER) Was it your sweet 16th
16 birthday?

17 A As I thought, in the manuscript when I
18 wrote it, I thought it was my sweet 16th birthday.

19 Q Okay. Now that you know it wasn't, where
20 did you spend your sweet 16th birthday?

21 A Well, I don't know.

22 Q Well, just give us your best guess.

23 MR. EDWARDS: Objection. And she's not
24 going to guess today. She's going to tell you the
25 answers as she remembers them.

1 A Again, I don't know.

2 Q Do you recall any present you actually got
3 on your sweet 16th birthday?

4 A No, I don't. I don't know where I spent
5 it, who I spent it with or what I got. I'm sorry.

6 Q How long did you work at Mar-a-Lago?

7 A Best of my recollection, it was a summer
8 job. I believe I started in June. And I think I
9 only worked there approximately two weeks, two, three
10 weeks.

11 Q How many hours a week did you work?

12 A I want to say it was a -- I want to say
13 it's a full-time job.

14 Q Do you recall it being a full-time job?

15 A It was a summer job, but just thinking
16 back, my dad used to bring me in and bring me home.
17 So he worked full time, all day. So -- and I didn't
18 lounge around Mar-a-Lago so, yes, I think it would
19 have been a full-time job.

20 Q And how much did you make per hour?

21 A Approximately, I think I remember making
22 \$9 an hour.

23 Q The bracelet and earrings you got for your
24 birthday, some birthday, on Little -- or where was
25 that birthday party, at Little St. James?

1 Q Which brother?

2 A Sky.

3 Q What about your other brother?

4 A I think he had moved out by then.

5 Q What forms of communication did you have?

6 Just a home phone number, or what?

7 A Yeah, there was a home phone.

8 Q When do you recall ever getting a cell
9 phone?

10 A The first cell phone I ever got was the
11 one that Ghislaine gave to me.

12 Q So you never had -- your parents, did they
13 have ones when you were working at Mar-a-Lago?

14 A No, my dad used to -- like, we had phones
15 in the spa and maintenance area and so on, so forth.
16 And you could, so to speak, page people from around
17 the courts.

18 Q Okay. So tell me what you recall of the
19 first conversation that you had with Ghislaine
20 Maxwell.

21 A I'm sitting there reading my book about
22 massage therapy, as I'm working in the spa. And I'm
23 getting my GE -- well, I was in the process of
24 getting my GED before I went to my summer job. I
25 decided that I would like to become a massage

1 A Yes.

2 Q Who else was at home when you got home?

3 A My mom, my dad and my brother.

4 Q Which brother?

5 A Sky.

6 Q And anyone else who was there at the time?

7 A I believe Michael might have been living
8 with me at that time. So he might have been there.

9 Q Do you recall if he was there when you got
10 home?

11 A I don't really remember. I remember what
12 I did when I got home, that I basically made a
13 beeline for the bathroom.

14 Q Let me ask you a question. Michael was
15 living with you at that home, at your parents' home
16 at the time, is your best recollection today; is that
17 right?

18 A That's my best recollection, yes.

19 Q When you say living with you, were you
20 guys staying in the same room?

21 A Yes.

22 Q Were you engaged at that time to him?

23 A That was a really weird relationship. He
24 was a friend who looked after me, and he did propose
25 to me and I did say yes. But my heart was never in

1 it.

2 He was somebody that helped me off the
3 streets so I felt compelled to say yes to him.

4 Q Okay. So when he proposed to you and you
5 said yes, did that take place before you started
6 working at Mar-a-Lago or after you started working at
7 Mar-a-Lago?

8 A Before.

9 Q And so if he were living with your parents
10 at that time, you were living in the same room; is
11 that correct?

12 A I believe so.

13 Q And your parents understood him to be your
14 fiance?

15 A I don't think they agreed with it, but I
16 think they understood it as that. I mean --

17 Q I mean, you communicated to them that he
18 had proposed and you had accepted?

19 A Yeah, in not such a pretty way. I mean,
20 they obviously weren't very happy about it. And it
21 wasn't my true intentions to ever marry him.

22 Q Okay.

23 A But I did it to make him feel okay. I
24 didn't want to be mean.

25 Q What did your mom say about your

1 know where it was when she said to go do this.

2 Q (BY MS. MENNINGER) Okay. Where were you
3 sent to have sex with the owner of a large hotel
4 chain by Ghislaine Maxwell?

5 MR. EDWARDS: Object to the form.

6 A I believe that was one time in France.

7 Q (BY MS. MENNINGER) Which time in France?

8 A I believe it was around the same time that
9 Naomi Campbell had a birthday party.

10 Q Where did you have sex with the owner of a
11 large hotel chain in France around the time of Naomi
12 Campbell's birthday party?

13 A In his own cabana townhouse thing. It was
14 part of a hotel, but I wouldn't call it a hotel.

15 Jeffrey was staying there. Ghislaine was
16 staying there. Emmy was staying there. I was
17 staying there. This other guy was staying there. I
18 don't know his name.

19 I was instructed by Ghislaine to go and
20 give him an erotic massage.

21 Q She used the words erotic massage?

22 A No, that's my word. The word massage is
23 what they would use. That's their code word.

24 Q Was she in the room when you gave this
25 erotic massage to the owner of a large hotel chain?

1 A No, she was not in the room. She was in
2 another cabana.

3 Q And other than telling you to go give the
4 owner of this large hotel chain a massage, do you
5 remember any other words she used to you to direct
6 you in what you should do?

7 A Not at the time, no.

8 Q Where did -- where were you and where was
9 Ms. Maxwell when she directed you to go have sex with
10 Marvin Minsky?

11 MR. EDWARDS: Object to the form.

12 A I don't know.

13 Q (BY MS. MENNINGER) Where did you go to
14 have sex with Marvin Minsky?

15 A I believe it was the U.S. Virgin Islands,
16 Jeff's -- sorry, Jeffrey Epstein's island in the U.S.
17 Virgin Islands.

18 Q And when was that?

19 A I don't know.

20 Q Do you have any time of year?

21 A No.

22 Q Do you know how old you were?

23 A No.

24 Q Other than Glenn Dubin, Stephen Kaufmann,
25 Prince Andrew, Jean Luc Brunel, Bill Richardson,

1 another prince, the large hotel chain owner and
2 Marvin Minsky, is there anyone else that Ghislaine
3 Maxwell directed you to go have sex with?

4 A I am definitely sure there is. But can I
5 remember everybody's name? No.

6 Q Okay. Can you remember anything else
7 about them?

8 A Look, I've given you what I know right
9 now. I'm sorry. This is very hard for me and very
10 frustrating to have to go over this. I don't -- I
11 don't recall all of the people. There was a large
12 amount of people that I was sent to.

13 Q Do you have any notes of all these people
14 that you were sent to?

15 A No, I don't.

16 Q Where are your notes?

17 A I burned them.

18 Q When did you burn them?

19 A In a bonfire when I lived at Titusville
20 because I was sick of going through this shit.

21 Q Did you have lawyers who were representing
22 you at the time you built a bonfire and burned these
23 notes?

24 A I've been represented for a long time, but
25 it was not under the instruction of my lawyers to do

1 this. My husband and I were pretty spiritual people
2 and we believed that these memories were worth
3 burning.

4 Q So you burned notes of the men with whom
5 you had sex while you were represented by counsel in
6 litigation, correct?

7 MR. EDWARDS: Object to the form.

8 A This wasn't anything that was a public
9 document. This was my own private journal, and I
10 didn't want it anymore. So we burned it.

11 Q (BY MS. MENNINGER) When did you write
12 that journal?

13 A Just over time. I started writing it
14 probably in, I don't know, I can't speculate, 2012,
15 2011.

16 Q So you did not write this journal at the
17 time it happened?

18 A No.

19 Q You started writing this journal
20 approximately a decade after you claim you finished
21 being sexually trafficked, correct?

22 A Yes.

23 Q And you started writing a journal after
24 you had a lawyer, correct?

25 A Correct.

1 Q Including Mr. Edwards, who is sitting
2 right here, correct?

3 A Correct.

4 Q What did that journal look like?

5 A It was green.

6 Q And what else?

7 A It was just a spiral notebook.

8 Q Okay. And what did you put into that
9 green spiral notebook?

10 A Bad memories. Things that I've gone
11 through, lots of things, you know. I can't tell you.
12 There was a lot of pages. It was over 300 pages in
13 that book.

14 Q Did you ever show that book to your
15 lawyers?

16 A No.

17 Q Did you show that book to anyone?

18 A My husband.

19 Q Did you show it to anyone else besides
20 your husband?

21 A No.

22 Q Did you tear out pages and give them to
23 Sharon Churcher?

24 A No, I wrote -- those pages that you're
25 talking about, I wrote for her specifically. She

1 wanted to know about the Prince Andrew incident.

2 Q So that's a different piece of paper?

3 A Yeah, that's just random paper.

4 Q So you had a green spiral notebook that
5 you began sometime in 2011 or 2012 in which you wrote
6 down your recollections about what had happened to
7 you, and you burned that in a bonfire in 2013.

8 Did I get that right?

9 A You got that right.

10 Q And do you have no other names of people
11 to whom you claim Ghislaine Maxwell directed you to
12 have sex, correct?

13 A At this time, no.

14 Q Is there any document that would refresh
15 your recollection that you could look at?

16 A If you have a document you'd like to show
17 me, I would be glad to look at it and tell you the
18 names I recognize off of that.

19 Q I'm just asking you if there's a document
20 you know of that has this list of names in it?

21 A Not in front of me, no.

22 Q Where is the original of the photograph
23 that has been widely circulated in the press of you
24 with Prince Andrew?

25 A I probably still have it. It's not in my

1 other terms of his probationary period?

2 A No. He went to everything that he was
3 supposed to go to.

4 Q Has he paid his fines?

5 A Yes, as far as I know.

6 Q Describe for me the contract that you had
7 with the Mail On Sunday?

8 A Could you be a little bit more specific?
9 Like --

10 Q Have you had more than one contract with
11 the Mail On Sunday?

12 A Well, there was one contract for the
13 picture. And that was to pay me 140,000 for the
14 picture. And then two stories were printed after
15 that for the amount of 10,000 each.

16 Q Is that the only money that you received
17 from the Mail On Sunday?

18 A Correct.

19 Q Did you receive any money for syndication
20 of the photograph?

21 A Isn't that what the 140 was for?

22 Q I'm asking you.

23 A Well, I don't really know what syndication
24 means.

25 Q Did you have a written contract with the

1 Mail on Sunday?

2 A Yes.

3 Q Where is that contract right now?

4 A I don't know. I've moved that many times.

5 I -- I lose paperwork wherever I go.

6 Q Is it possible it's in the boxes in
7 Sydney?

8 A I don't think I kept it, to be honest.

9 Q Did you ever refer back to it after you
10 signed it?

11 A I know I kept it for a short while, but I
12 mean, like I said, I've moved countries twice in the
13 last two years and three different houses. So the
14 paper trail is lost. I don't know where it would be.

15 Q Did you receive it via e-mail?

16 A No. I received it -- Sharon Churcher
17 handed it to me by paper.

18 Q And you signed it?

19 A I signed it.

20 Q And then did you make a copy of it?

21 A No.

22 Q You never had a copy of it?

23 A Well, I had my own copy. I'm sure she has
24 hers.

25 Q Do you recall there being a period of

1 STATE OF COLORADO)

2) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER)

4 I, Kelly A. Mackereth, do hereby certify
5 that I am a Registered Professional Reporter and
6 Notary Public within the State of Colorado; that
7 previous to the commencement of the examination, the
8 deponent was duly sworn to testify to the truth.

9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.

14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.

18 In witness whereof, I have affixed my
19 signature this 11th day of May, 2016.

20 My commission expires April 21, 2019.

21
22
23 Kelly A. Mackereth, CRR, RPR, CSR
24 216 - 16th Street, Suite 600
25 Denver, Colorado 80202

EXHIBIT O

Page: 1 Document Name: untitled

PANEL: _____
T234

A07. ASSIGNMENT HISTORY

YEAR: 16

T234

Monday May 23, 2016 9:04 am

STDT: 12870606

ROBERTS, VIRGINIA L

SCHL: 3390 GR: 10 ST: I

A	ENTRY			WITHDRAWAL			P											E
C	CD	DATE	OD	CD	DATE	R	PF	SY	CL	DS	SCHL	DESC	GR	PRS	ABS	UNX	Y	
—	R02	101201	—	W26	030702	N	—	02	01	—	3390	SURVIVORS	10	56	31	—	Y	
—	R02	092001	—	W02	101101	N	—	02	01	—	2331	ROYAL PALM HIG	10	13	1	—	—	
—	EA1	081401	—	W32	092001	Z	—	02	A1	—	2192	WLLNGTN HS ADL	30	—	—	—	—	
—	EA1	081600	—	W47	081301	Z	—	01	A1	—	2192	WLLNGTN HS ADL	30	—	—	—	Y	
—	EA1	062100	—	W47	081500	Z	—	00	A1	—	2192	WLLNGTN HS ADL	30	—	—	—	Y	
—	E01	081699	—	W03	081699	N	—	00	01	—	2331	ROYAL PALM HIG	10	—	—	—	—	
—	E01	081998	—	W02	060999	P	—	99	01	—	0581	FOREST HILL HI	09	155	25	—	Y	
—	E01	082097	—	W01	061098	R	—	98	01	—	2331	ROYAL PALM HIG	09	147	33	—	Y	
—	E01	082097	—	W22	082097	N	—	98	01	—	2191	WELLINGTON HIG	09	—	—	—	—	
—	R03	040797	—	W02	061197	P	—	97	01	—	1691	CRESTWOOD MID	08	40	5	—	Y	
—	E01	082294	—	DNE	082294	N	—	95	01	—	1703	ROYAL PINES SC	06	—	—	—	—	
—	E01	082393	—	W02	061094	P	—	94	01	—	1901	LOXAHATCHEE EL	05	167	13	—	Y	
—	E01	082592	—	W01	061193	P	—	93	01	—	1901	LOXAHATCHEE EL	04	176	4	—	Y	

PF1=HELP 3=EXIT 5=REFRESH 7=BKWD 8=FWD 9=NEXT PAGE 12=ESCAPE
PAGE FULL...CONTINUE.

TERML: I1B5

CONFIDENTIAL
GIUFFR004981

TO - DISTRICT: 000050 PALM BEACH
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008
SCHOOL: 3390 DEMOGRAPHIC INFORMATION FILE: SRTS121S
CURRENT DISTRICT: 50 PALM BEACH
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L.
MAILING ADDRESS: 12959 RACKLEY RD
DISTRICT: LOXAHATCHEE
DISTRICT STUDENT ID: 12870606 FL STUDENT ID-ALIAS: WEST PALM BEACH FL 33409
PARENT/GUARDIAN (NAME/CODE): SKY ROBERTS
PARENT: LYN ROBERTS
RACIAL/ETHNIC CATEGORY: W SEX: F
BIRTH VERIFICATION: 1
BIRTHPLACE: SACRAMENTO CA

IMMUNIZATION STATUS: PERMANENT IMMUNIZATION CERTIFICATE
VACCINE STATUS, DATE-
TYPE DOSE DATE DOSE DATE DOSE DATE DOSE DATE
DTP 1 11/02/1983 2 02/03/1984 3 04/27/1984 4 04/24/1987 5 09/27/1988
POLIO 1 06/24/1997
HIB 1 11/02/1983 2 02/03/1984 3 04/24/1987 4 09/27/1988
MMR 1 04/24/1987
MEASLES 1 04/24/1987
HEP B 3DOSE 1 04/18/1997 2 06/24/1997 3 09/08/1999

COURSE INFORMATION
DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1989-1990 GRADE LEVEL: NA
DISTRICT: 50 SCHOOL: 1901 LOXAHATCHEE GROVES ELEM.
YEAR: 1991-1992 GRADE LEVEL: 03
T COURSE# COURSE TITLE SUBJECT CRSE CREDIT
3 5100090 THIRD GRADE AREA FLAG GRD ATT./EARN
CREDIT, TERM: 0.00 0.00
1991-1992 ANNUAL DAYS-PRESENT: 180 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1990-1991 GRADE LEVEL: NA
GPA QTY PTS
DISTRICT-TERM: 1.4286 5.00 CUM: 1.5429 27.00
STATE-TERM: 1.4286 5.00 CUM: 1.5429 27.00
1990-1991 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED
DISTRICT: 50 SCHOOL: 1901 LOXAHATCHEE GROVES ELEM.
YEAR: 1992-1993 GRADE LEVEL: 04
T COURSE# COURSE TITLE SUBJECT CRSE CREDIT
3 5100100 FOURTH GRADE AREA FLAG GRD ATT./EARN
CREDIT, TERM: 0.00 0.00
1992-1993 ANNUAL DAYS-PRESENT: 176 ABSENT: 4
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

OFFICIAL TRANSCRIPT
THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FLORIDA
APR 1 2008
E. Hatchett
RECORDS CUSTODIAN

TO - DISTRICT: 0000050 PALM BEACH
 GRADE LEVEL: 10 PREPARED DATE: 03/11/2008
 SCHOOL: 3390 COURSE INFORMATION FILE: SRTS121S
 CURRENT DISTRICT: 50 PALM BEACH PAGE 2
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L (561) 712-1800

DISTRICT: 50 SCHOOL: 1901 LOXNATCHEE GROVES ELEM. DISTRICT: 50 SCHOOL: 2331 ROYAL PALM BEACH COMM HIG
 YEAR: 1993-1994 GRADE LEVEL: 05 YEAR: 1997-1998 GRADE LEVEL: 09

T	COURSE#	COURSE TITLE	AREA FLAG	GRD	ATT./EARN	CREDIT	SUBJECT	CRSE	AREA FLAG	GRD	ATT./EARN	CREDIT
3	5100110	FIFTH GRADE	P	0.00	0.00	0.00	EL	RJ	P	0.50	0.00	0.50
3	5100110	FIFTH GRADE	P	0.00	0.00	0.00	EN	RJ	D	0.50	0.50	0.50

1993-1994 ANNUAL DAYS-PRESENT: 167 ABSENT: 13
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
 ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
 YEAR: 1994-1995 GRADE LEVEL: NA

DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00	GPA QTY PTS
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00	

1994-1995 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
 NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

DISTRICT: 50 SCHOOL: 1691 CRESTWOOD MIDDLE
 YEAR: 1996-1997 GRADE LEVEL: 08

T	COURSE#	COURSE TITLE	AREA FLAG	GRD	ATT./EARN	CREDIT
2	0400010	M/J DRAMA 2	A	0.00	0.00	0.00
2	8500240	TEEN CHALLENGES	C	0.00	0.00	0.00
3	1001070	M/J LANG ARTS 3	C	0.00	0.00	0.00
3	1205070	M/J MATH 3	D	0.00	0.00	0.00
3	2002100	M/J COMPR SCI 3	C	0.00	0.00	0.00
3	2103050	M/J FLOR:CHA AND CHO	C	0.00	0.00	0.00

1996-1997 ANNUAL DAYS-PRESENT: 40 ABSENT: 5
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
 ACADEMICALLY PROMOTED

OFFICIAL TRANSCRIPT
 THE SCHOOL DISTRICT OF
 PALM BEACH COUNTY, FLORIDA

APR 1 2008

E. Hatcher
 RECORDS CUSTODIAN

CONFIDENTIAL
GIUFFRÉ004983

TO : DISTRICT: 000050 PALM BEACH
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 COURSE INFORMATION FILE: SETS12IS
CURRENT DISTRICT: 50 PALM BEACH
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L

(561) 712-1800

DISTRICT: 50 SCHOOL: 0581 FOREST HILL HIGH
YEAR: 1998-1999 GRADE LEVEL: 09

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 2000-2001 GRADE LEVEL: NA

T	COURSE#	COURSE TITLE	SUBJECT	AREA	FLAG	GRD	ATT./EARN	CREDIT
1	0500500	PERS, CAR, SCH DEV 1	EL				0.50 0.50	
1	0701320	FRENCH 1	FL	RJ			0.50 0.50	
1	1001340	ENG 2	EN	RJ			0.50 0.50	
1	1200380	ALGEBRA IB	MA	JR			0.50 0.00	
1	1900300	DRIVER ED CLASS	EL				0.50 0.50	
1	2000310	BIOLOGY 1	SC	RJ			0.50 0.50	
1	2109310	WORLD HIST	WH	RJ			0.50 0.00	
2	0500500	PERS, CAR, SCH DEV 1	EL				0.50 0.00	
2	0701320	FRENCH 1	FL	RJ			0.50 0.00	
2	0800300	HEALTH- LIF MGMT SKL	LM	RJ			0.50 0.00	
2	1001340	ENG 2	EN	RJ			0.50 0.00	
2	1200380	ALGEBRA IB	MA	JR			0.50 0.00	
2	2000310	BIOLOGY 1	SC	RJ			0.50 0.00	
2	2109310	WORLD HIST	WH	RJ			0.50 0.00	

CREDIT, TERM:

GPA QTY PTS
DISTRICT TERM: 1.2857 9.00 CUM: 1.5714 22.00
STATE TERM: 1.2857 9.00 CUM: 1.5714 22.00

1998-1999 ANNUAL DAYS-PRESENT: 155 ABSENT: 25
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1999-2000 GRADE LEVEL: NA

GPA QTY PTS
DISTRICT TERM: 1.4286 5.00 CUM: 1.5429 27.00
STATE TERM: 1.4286 5.00 CUM: 1.5429 27.00

1999-2000 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

GPA QTY PTS
DISTRICT TERM: 1.4286 5.00 CUM: 1.5429 27.00
STATE TERM: 1.4286 5.00 CUM: 1.5429 27.00
2000-2001 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
PROMOTION STATUS NOT APPLICABLE

DISTRICT: 50 SCHOOL: 3390 SURVIVORS CHARTER SCHOOL
YEAR: 2001-2002 GRADE LEVEL: 10

T	COURSE#	COURSE TITLE	SUBJECT	AREA	FLAG	GRD	ATT./EARN	CREDIT
1	0500530	PERS, CAR, SCH DEV 4	EL				0.50 0.50	
1	1001440	BUSINESS ENG 1	EN	J			0.50 0.50	
1	1205370	CONSUMER MATH	MA	C			0.50 0.50	
1	8300310	WORKPLACE ESSENTIALS VO	B				0.50 0.50	
1	8301610	WORK EXP 1	VO				0.50 0.00	
1	8301650	WORK EXP-OJT	VO				1.00 0.00	

CREDIT, TERM:

GPA QTY PTS
DISTRICT TERM: 1.4286 5.00 CUM: 1.5429 27.00
STATE TERM: 1.4286 5.00 CUM: 1.5429 27.00

2001-2002 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
PROMOTION STATUS NOT APPLICABLE

OFFICIAL TRANSCRIPT
THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FLORIDA

APR 1 2008

L. Hatchett
RECORDS CUSTODIAN

TO - DISTRICT: 0000050 PALM BEACH
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008
SCHOOL: 3390 GRADUATION SUMMARY FILE: SRPS1218
CURRENT DISTRICT: 50 PALM BEACH PAGE 4
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L.
(561) 712-1800

***** C U M U L A T I V E S U M M A R Y *****
AS OF: 03/31/2008

* GRADUATION OPTION: 4-YR STANDARD *
* SUBJECT TOTAL CREDITS *
* AREA TO DATE NEEDED REMAINING *
* ENGLISH (EN) 2.00 4.00 2.00 *
* MATHEMATICS (MA) 1.50 3.00 1.50 *
* SCIENCE (SC) 1.50 3.00 1.50 *
* AMER HISTORY (AH) 0.00 1.00 1.00 *
* WORLD HISTORY (WH) 0.50 1.00 0.50 *
* ECONOMICS (EC) 0.00 0.50 0.50 *
* AMER GOVERNMENT (AG) 0.00 0.50 0.50 *
* VOCATIONAL/ (VO) 0.50 1.00* 0.50* *
* PERFORM FINE ART (PF) 0.00 0.00 0.50 *
* LIFE MGMT SKILLS (LM) 0.00 0.50 0.50 *
* PHYSICAL ED (PE) 0.50 0.50 0.00 *
* FOREIGN LANGUAGE (FL) 0.50 0.00 0.00 *
* LANGUAGE ARTS (LA) 0.00 0.00 0.00 *
* SOCIAL STUDIES (SS) 0.00 0.00 0.00 *
* ELECTIVE (EL) 2.00 9.00 6.50 *
* ESE (EX) 0.00 *
* COMPUTER ED (CE) 0.00 *
* CREDITS, CUMULATIVE: 9.00 24.00 15.00 *
* * TOTALS INCLUDE VOCATIONAL & PERFORM FINE ARTS *
* GPA QTY PTS GPA QTY PTS *
* DISTRICT: 1.5429 27.00 STATE: 1.5429 27.00 *

* CERTIFIED BY: *****
* SIGNATURE: *****
* DATE: *****

COMMUNITY SERVICE HOURS: 0 REQUIREMENT MET: N

DISTRICT CLASS RANK- EFFECTIVE DATE: 03/06/2002
CLASS RANK, NUMERICAL POSITION: 65
CLASS RANK, PERCENTILE: 70
CLASS RANK, TOTAL NUMBER IN CLASS: 214

DATE PASSED ASSESSMENT TEST FOR GRADUATION PURPOSES
COMMUNICATIONS: 10/2001
MATHEMATICS: 01/2002

OFFICIAL TRANSCRIPT
THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FLORIDA
APR 1 2008
E. Hatchett
RECORDS CUSTODIAN

TC - DISTRICT: 0000050 PALM BEACH
 GRADE LEVEL: 10 PREPARED DATE: 03/31/2008
 SCHOOL: 3390 COMMENTS FILE: SETSL21S
 CURRENT DISTRICT: 50 PALM BEACH PAGE 5
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL
 (561) 712-1800

LEGAL NAME: ROBERTS, VIRGINIA L

DEFINITION OF TERM CODES			
CODE DEFINITION	CODE DEFINITION	CODE DEFINITION	CODE DEFINITION
1 SEMESTER 1	S COMBINED SUMMER	E QUINTESTER 1	J SIX WEEKS 1
2 SEMESTER 2	SESSION	F QUINTESTER 2	K SIX WEEKS 2
3 ANNUAL	T INTERSESSION 1*	G QUINTESTER 3	L SIX WEEKS 3
4 SUMMER SESSION 1	U INTERSESSION 2*	H QUINTESTER 4	M SIX WEEKS 4
5 SUMMER SESSION 2	V INTERSESSION 3*	I QUINTESTER 5	N SIX WEEKS 5
K SHORT COURSE**	W INTERSESSION 4*	Y YEAR OF	O SIX WEEKS 6
	X INTERSESSION 5*	9 QUARTER 4	NONENROLLMENT***

* USED (INSTEAD OF SUMMER SCHOOL SESSIONS) WITH YEAR-ROUND SCHOOL RECORDKEEPING
 ** USED ONLY FOR WORKFORCE DEVELOPMENT EDUCATION (ADULT GENERAL AND POSTSECONDARY VOCATIONAL EDUCATION)
 *** USED ONLY FOR REPORTING STUDENTS WHO HAVE WITHDRAWN BETWEEN SCHOOL YEARS

STATE GRADING SCALE FOR HIGH SCHOOL STUDENTS (REGARDLESS OF ENTRY DATE) EFFECTIVE SCHOOL YEAR 1997-1998

GRADING SCALE, EFFECTIVE 07/01/2001			
GRADE EQUIVALENT	GRADE QUALITY	GRADE EQUIVALENT	GRADE QUALITY
A = 90 - 100	4.00	B = 80 - 89	3.00
D = 60 - 69	1.00	F = 0 - 59	0.00
		C = 70 - 79	2.00

GRADING SCALE, PRIOR TO 07/01/2001			
GRADE EQUIVALENT	GRADE QUALITY	GRADE EQUIVALENT	GRADE QUALITY
A = 94 - 100	4.00	B = 85 - 93	3.00
D = 70 - 76	1.00	F = 0 - 69	0.00

NOTE: FROM THE 1987-1988 THROUGH THE 1996-1997 SCHOOL YEARS, FOR STUDENTS ENTERING HIGH SCHOOL DURING THESE YEARS, THE GRADE EQUIVALENTS FOR C, D, AND F WERE:
 C = 75-84, D = 65-74, AND F = 0-64; QUALITY POINTS AND ALL OTHER GRADES WERE THE SAME AS THOSE SHOWN IN THE IMMEDIATELY PRECEDING STATE GRADING SCALE.

TO - DISTRICT: 0000050 PALM BEACH
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008
SCHOOL: 3390 COMMENTS FILE: SKT3121S
CURRENT DISTRICT: 50 PALM BEACH PAGE 6
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L (561) 712-1800

----- STATE DEFINED COURSE FLAGS -----
R=ACADEMIC SCHOLAR-ELECTIVE 9=NINTH GRADER
G=GIPTED H=HONORS N=NO CREDIT
I=INCLUDE IN GPA X=EXCLUDE FROM GPA W=EXCLUDE FROM STATE GPA
P=COURSE IS IN PROGRESS S=CREDIT AWARDED BY SLEP EXAM T=TRANSFERRED COURSE

VOCATIONAL SUBSTITUTION COURSES-
\$=JOURNALISM SUB FOR PEAC ARTS 0=JROTC SUB FOR PRACTICAL ARTS
2=SUB FOR BUS EN I 1001440 3=SUB FOR BUS EN I 1001440/II 1001450 1=COMP ED SUB FOR PRACTICAL ARTS
5=SUB FOR MA I 1205380/II 1205390 6=SUB FOR GEN SCI 2002310 4=SUB FOR MA I 1205540
8=SUB FOR PRE ALGEBRA 1200300 A=JROTC CST GD SUB FOR SCIENCE F=JROTC AIR FC SUB FOR SCIENCE
K=JROTC NAVY SUB FOR SCIENCE O=JROTC ARMY SUB FOR LIFE MGMT Q=JROTC MARINE SUB FOR LIFE MGMT
@=SUB FOR BIO TECH 2000430 #=SUB FOR ENV SCI 2001340 %=SUB FOR PHY SCI 2001310
*=SUBSTITUTE FOR COURSE SPECIFIED ON FOLLOWING LINE ON COURSE LIST

ELL INSTRUCTION-
M=HOME LANGUAGE INSTRUCTION B=HOME LANGUAGE &/OR ESOL INSTRUCTION (ELEMENTARY SELF-CONTAINED)
D=ESOL INSTRUCTION

----- FY 1991-1992 COMMENTS -----
THE PALM BEACH COUNTY SCHOOL DISTRICT AWARDS THE HIGH SCHOOL VALIDICTORIAN
AND SALUTATORIAN USING A WEIGHTED GPA AVERAGE THAT IS BASED ON COURSES TAKEN
IN GRADES 9 - 12. HOWEVER, THE DISTRICT GPA INCLUDES ALL CREDIT COURSES.

TO - DISTRICT: 0000050 PALM BEACH SCHOOL: 3390 CATEGORY B INFORMATION FILE: SKTS121S
 GRADE: 10 CURRENT DISTRICT: 50 PALM BEACH CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL PAGE 7

LEGAL NAME: ROBERTS, VIRGINIA L (561) 712-1800

WITHDRAWAL-DATE: 03/07/2002 CODE: W26

HOME LANGUAGE SURVEY DATE: 06/15/2000

NATIVE LANGUAGE: EN ENGLISH

COUNTRY OF BIRTH: US UNITED STATES
 PRIMARY HOME LANGUAGE: EN ENGLISH

HEALTH EXAMINATION, SCHOOL ENTRY: Y SCHOOL ENTRY HEALTH EXAMINATION CERTIFIED.

STUDENT PLAN DATE: 05/11/1999 CURRENT EVALUATION/RE-EVALUATION DATE: 05/11/2002
 PRIMARY EXCEPTIONALITY: Z FEPP PROGRAM:

----- EXCEPTIONAL STUDENT PROGRAM INFORMATION -----
 EVALUATION COMPLETE DATE 05/11/99 05/11/99 05/11/99 05/11/99 05/11/99
 REFERRAL DATE 05/10/99 05/11/99 05/11/99 05/11/99 05/11/99
 PLACEMENT STATUS ELIGIBLE AND PLACED ELIGIBLE AND PLACED
 EXCEPTIONALITY HOSPITAL/HOMEBOUND HOSPITAL/HOMEBOUND

----- DROPOUT PREVENTION PROGRAM INFORMATION -----
 PLACEMENT REASONS OUTCOMES
 EDUCATIONAL ALTERNATIVE PROGRAMS ACADEMICALLY UNSUCCESSFUL DOCUMENTD IMPROV ACADMC PERFORMANCE
 EDUCATIONAL ALTERNATIVE PROGRAMS ACADEMICALLY UNSUCCESSFUL DOCUMENTD IMPROV ACADMC PERFORMANCE
 EDUCATIONAL ALTERNATIVE PROGRAMS ACADEMICALLY UNSUCCESSFUL DOCUMENTD IMPROV ACADMC PERFORMANCE

----- TEST INFORMATION -----
 TEST NAME LEVEL SUBJECT SCORE SCORE SUBJECT SCORE SCORE
 GRD DATE TEST NAME FORM CONTENT TYPE TYPE CONTENT TYPE TYPE TYPE
 30 06/16/2000 TAB 7 A TOTBAT GE 0000 MATH(T) GE 0000 READ(T) GE 0000
 LANGUAGE GE 0110
 30 06/15/2000 TAB 7 A TOTBAT GE 0000 MATH(T) GE 0000 READ(T) GE 0126
 LANGUAGE GE 0000
 30 06/15/2000 TAB 7 M TOTBAT GE 0000 MATH(T) GE 0073 READ(T) GE 0000
 LANGUAGE GE 0000
 09 04/20/1998 CTB A 19 COMPREHE SS 0801 COMPREHE NP 0065 PROB/SLV SS 0759
 SS/ENVIR NP 0034 SCIENCE SS 0000 SS/ENVIR NP 0000
 SS/ENVIR SS 0000

TO - DISTRICT: 0000050 PALM BEACH
 GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 TEST INFORMATION FILE: SPTS121S
 CURRENT DISTRICT: 50 PALM BEACH PAGE 8 OF 8
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L
 (561) 712-1800

TEST INFORMATION:

TEST GRD DATE	TEST NAME	LEVEL FORM	SUBJECT CONTENT	SCORE TYPE	SUBJECT CONTENT	SCORE TYPE	SUBJECT CONTENT	SCORE TYPE	SUBJECT CONTENT	SCORE TYPE
08 04/15/1997	CTB	B 17	READ(T)	SS 0000	READ(T)	NP 0000	COMPREH SS 0780	NP 0000	MATH(T)	SS 0000
			MATH(T)	NP 0000	COMPREH SS 0780	NP 0000	COMPREH NP 0077	SS 0000	VOCAB	SS 0000
			COMPUTAT	SS 0000	COMPUTAT NP 0000					
08 04/15/1997	CTB	B 17	VOCAB	NP 0000	PROB/SLV SS 0788		PROB/SLV NP 0070			
05 04/22/1994	CTB	B 15	COMPREH	SS 0708	COMPREH NP 0032		PROB/SLV SS 0667			
			PROB/SLV	NP 0010	LANGUAGE SS 0694		LANGUAGE NP 0026			
			CAP/MECH	SS 0646	CAP/MECH NP 0008		USAGE/EX SS 0742			
05 04/22/1994	CTB	B 15	USAGE/EX	NP 0061						
04 03/29/1993	CTB	A 14	READ(T)	SS 0711	READ(T)	NP 0059	MATH(T)	SS 0668		
			MATH(T)	NP 0022	COMPREH SS 0735		COMPREH NP 0074			
			COMPUTAT	SS 0667	COMPUTAT NP 0021		VOCAB	SS 0685		
04 03/29/1993	CTB	A 14	VOCAB	NP 0043	PROB/SLV SS 0669		PROB/SLV NP 0024			
			SCIENCE	SS 0707	SCIENCE NP 0049		SS/ENVIR SS 0692			
			SS/ENVIR	NP 0034						
04 02/10/1993	WAP	04	WR NARRA	SS 0000	WR EXPOS SS 0000		WRITING	SS 0000		
03 04/08/1992	CTB	A 13	COMPREH	SS 0733	COMPREH NP 0085		PROB/SLV SS 0649			
			PROB/SLV	NP 0026	LANGUAGE SS 0696		LANGUAGE NP 0050			
			CAP/MECH	SS 0679	CAP/MECH NP 0044		USAGE/EX SS 0712			
03 04/08/1992	CTB	A 13	USAGE/EX	NP 0056						
02 04/16/1991	CTB	A 12	READ(T)	SS 0663	READ(T)	NP 0060	MATH(T)	SS 0467		
			MATH(T)	NP 0001	COMPREH SS 0659		COMPREH NP 0051			
			COMPUTAT	SS 0337	COMPUTAT NP 0001		VOCAB	SS 0667		
02 04/16/1991	CTB	A 12	VOCAB	NP 0070	PROB/SLV SS 0597		PROB/SLV NP 0025			

***** END OF TRANSCRIPT *****

EXHIBIT P

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,
Plaintiff,

v.

GHISLAINE MAXWELL,
Defendant.

_____/

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 1 of 2

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Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

TIME: Commenced: 8:59 a.m.
Concluded: 1:22 p.m.

PLACE: Southern Reporting Company
B. Paul Katz Professional Center
(SunTrust Building)
One Florida Park Drive South
Suite 214
Palm Coast, Florida 32137

REPORTED BY: LEANNE W. FITZGERALD, FPR
Florida Professional Reporter
Court Reporter and Notary Public

APPEARANCE OF COUNSEL

ON BEHALF OF THE PLAINTIFF:

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Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.
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Also appearing: Jenny Martin, Videographer from Abel
Virginia Giuffre, Plaintiff

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STIPULATION

It is hereby stipulated and agreed by and
between counsel present at this deposition and by
the deponent that the witness review of this
deposition would be waived.

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(MARKED BY THE DEFENDANT:)

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- - -

1 BY MS. MENNINGER:

2 Q And where did you go after Royal Palm
3 Beach?

4 A I believe it was South Area. I'm pretty
5 sure it was South Area.

6 Q Did you go to another school after that?

7 A Yeah. I went to Gold Coast after that.

8 Q Is that also in Royal Palm Beach?

9 A No. That's -- South Area was in Lake
10 Worth. Gold Coast is in West Palm. They were both
11 alternative schools.

12 Q Did you ever go to a Survivors Charter
13 School?

14 A Yes. I went there, too.

15 Q When did you go there?

16 A I'm not exactly sure of the date. But it
17 was somewhere after either -- I'm pretty sure it
18 was -- maybe -- I can't remember if it was Gold
19 Coast first or Survivor. But one of the -- I'm
20 trying to remember. I honestly don't remember which
21 one came first.

22 Q That's all right.

23 Can you describe for me Survivors Charter
24 School? What is it like, or was it like?

25 A I mean, like I said, it was an alternative

1 school. It was just pretty much a bunch of bad
2 kids, you know, who have gotten kicked out. And it
3 was pretty much like a last chance kind of school,
4 you know what I mean?

5 Q Does it look like a school?

6 A Kind of. I mean, it had, like, a
7 cafeteria, and then it had a whole bunch of, like,
8 portables and stuff around there. And it was
9 under -- it was, like, right near the Lake Worth. I
10 remember there was, like, a bridge that went over
11 the interstate right by it. But, I mean, it was
12 just a little, you know, little crappy school.

13 Q Was it during the day or at night?

14 A It was during the day.

15 Q So regular school hours?

16 A Yeah. Well, it was actually a little bit
17 shorter hours. I can't remember exactly. But I
18 know it was not like the full days. Because, I
19 mean, at the alternative schools, it's obviously not
20 up to regular high school standards. I mean, they
21 just do pretty much stuff to get people to get out
22 of school, you know, so...

23 Q Get the credits that you need?

24 A Yeah. So that way they can finish high
25 school and not drop out and whatnot, so...

1 Q You actually go there in the morning,
2 though, and take classes?

3 A Yeah.

4 Q And get checked in at attendance?

5 A Yeah.

6 Q And then you may leave a little earlier
7 than a regular school day?

8 A Uh-huh (affirmative).

9 Q All right. It's not a online program?

10 A No, it was not online.

11 Q When you were at Survivors Charter School,
12 did you ever see Ms. Roberts there?

13 A Was it Survivors? I don't remember if it
14 was Survivors. Or was it -- because I'm pretty sure
15 we were both -- was it -- I know we both went to one
16 of the schools. I'm pretty sure it was Survivors,
17 maybe.

18 Q Did you see her there?

19 A Now, when we went to the school, like, we
20 were together afterwards. But I don't remember
21 exactly which one it was. I know it was one of
22 those alternative schools that we went to, though.

23 Q Okay. Did you -- was Wellington an
24 alternative school?

25 A No. Wellington is a -- is a real high

1 school, like a regular high school.

2 Q Do you know if Wellington has an adult
3 program?

4 A They might. I mean, I really don't know.
5 I'm not sure.

6 Q Did you ever take night classes there?

7 A No.

8 Q So you believe when you reunited with
9 Ms. Roberts in or around 2001, she had also gone to
10 one of those alternative schools?

11 A When I reunited with her, no. We ended
12 up, like, trying to go finish school.

13 Q Tell me about that.

14 A I mean, we just ended up going to one of
15 those alternative schools and didn't even finish
16 that.

17 Q So you two had both left school, but went
18 back together --

19 A Yeah.

20 Q -- to one of the alternative schools?

21 A Yeah.

22 Q And that may have been Survivors Charter
23 School?

24 A Yeah. I'm pretty sure it probably was.
25 I'm pretty sure.

1 Q You both wanted to get your GEDs?

2 A Yeah.

3 Q Get better jobs?

4 A Uh-huh (affirmative).

5 Q Things like -- that was the plan?

6 A Yeah.

7 Q But it did not work out?

8 A Yeah.

9 Q Do you know how long the two of you went
10 to Survivors Charter School?

11 A I honestly don't remember.

12 Q Okay. You do have a recollection of going
13 with her, though?

14 A Yeah.

15 Q Seeing her there?

16 A Uh-huh (affirmative).

17 Q I'm trying to get a little bit of a time
18 frame on the time that you reunited with
19 Ms. Roberts. I know you said you lived -- you
20 remember being in an apartment with her in September
21 of 2000 -- 9/11/2001; right?

22 A Yeah.

23 Q Do you think you had been together with
24 her for a while at that point?

25 A It was probably, I'd say, like a month or

1 so. Like, I'm pretty sure. Because it was not too
2 long after I had moved in, so...

3 Q And just to be clear, she already lived in
4 the apartment?

5 A Yeah. She lived in the apartment with her
6 ex-boyfriend Michael and JJ. And I think there was
7 somebody else. I don't remember who, though.

8 Q All right. That's where she was living
9 when you reunited with her?

10 A Yeah.

11 Q And then you moved in?

12 A Yeah.

13 Q Did the other people move out?

14 A Yeah. I kicked them out.

15 Q How long did you live there with
16 Ms. Roberts?

17 A I think it was just till, like, the end of
18 the lease, so it was probably maybe, like, five or
19 six months. I'm pretty sure. I don't know. I'm
20 not exactly [sic] on the whole time frame.

21 Q That's okay. I understand it was a while
22 ago.

23 A Yeah.

24 Q Where did you two move from there?

25 A I believe we either -- we went to her --

1 it was either her family's house or mine. It was
2 either one of the two. And then we ended up getting
3 another -- we were renting a house out in
4 Loxahatchee also, eventually. But we also stayed in
5 a little trailer behind her parents' house.

6 Q When did your relationship with
7 Ms. Roberts end the second time?

8 A When she went to Thailand and --
9 (Brief interruption.)

10 A -- never heard from her again.

11 THE COURT REPORTER: I'm sorry. Can you
12 re-answer?

13 A Yeah. When Jeffry sent her to Thailand.
14 And then I never heard from her again until
15 freaking, like, two days ago.

16 BY MS. MENNINGER:

17 Q You heard from her two days ago?

18 A Yeah. She had called me to apologize
19 about, obviously, everything about me getting
20 dragged into this mess. And we talked just pretty
21 much about, you know, the way shit ended, and pretty
22 much tried just -- her apologizing mainly about
23 dragging me all into this and having to make me
24 get -- you know, knowing how I have my family and
25 stuff now. And that was pretty much it, so...

1 Q Another instant connection.

2 A Uh-huh (affirmative).

3 Q From the time Ms. Roberts left to go to
4 Thailand until today, have you seen her?

5 A Nope.

6 And to be honest, it still does not even
7 feel real that she's sitting right there across from
8 me.

9 Q Well, you offered to get in touch with her
10 a couple of times?

11 A I know. But, like I said, it's just -- it
12 still does not seem like this is actually happening.
13 Like, she's -- I don't know. It's like talking to a
14 ghost or seeing one.

15 Q Does she look different now?

16 A Yeah.

17 Q How?

18 A Just more mature, more older.

19 Q When you were with Ms. Roberts the first
20 time in '98 --

21 A Uh-huh (affirmative).

22 Q -- you believe that relationship lasted
23 just a couple of weeks?

24 A Yeah. I'm not exactly sure, but it was
25 pretty brief.

1 A I believe so, yes.

2 Q What did she tell you about that?

3 A I -- I think that maybe he -- I mean, I
4 don't know exactly. I don't really remember. I
5 remember hearing about him, but I don't remember
6 what she said about him.

7 Q Did Ms. Roberts ever tell you that she had
8 met Al Gore?

9 A Not that I'm aware of.

10 Q Did Ms. Roberts ever tell you that she had
11 met a foreign president?

12 A I'm not sure; I'm not sure.

13 Q Did Ms. Roberts ever tell you she had met
14 a prime minister?

15 A I don't know.

16 Q Did Ms. Roberts ever tell she had met a
17 senator?

18 A Not that I'm aware of. I mean, she's told
19 me that she met a bunch of people before. And after
20 it started becoming, like, an almost everyday thing
21 about -- just hearing about famous people with
22 Jeffrey and stuff like that, it's, like, I kind of
23 didn't, like, tone it out, but I just -- it became
24 normal, so I just stopped, like, listening to all
25 the details, because I was not going to meet these

1 people, you know what I mean? It's just, like, all
2 right.

3 Q Was she excited that she was meeting
4 famous people?

5 A Yeah.

6 Q Was that a job perk?

7 A Obviously.

8 Q She talked about it a lot?

9 A Yeah.

10 Q To the point where you were drowning it
11 out?

12 A Well, that's what I'm saying. It was not
13 like I was drowning it out. It's just I knew that
14 she was with Jeffrey, and he was, obviously,
15 well-connected with everybody. So it was not like,
16 you know, a special occasion, per se. You know, it
17 was, but it's not like it was -- it was not very not
18 rare so...

19 Q Did she show you any photographs of
20 herself with famous people?

21 A No.

22 Q Did you see a photograph of her with
23 Prince Andrew --

24 A Yes.

25 Q -- in her possession?

1 BY MS. MENNINGER:

2 Q Mr. Figueroa, you mentioned that you and
3 Ms. Roberts attempted to go to back to school while
4 you were together --

5 A Yes.

6 Q -- to get your GED?

7 A Yeah. Yes.

8 Q And you believe that you went to the
9 Survivors Charter School?

10 A Yes.

11 MS. MENNINGER: Okay. I'm going to mark
12 Defendant's Exhibit 6.

13 (Defendant's Exhibit 6 was marked for
14 identification.)

15 BY MS. MENNINGER:

16 Q This is a school record for Ms. Roberts
17 that lists the names of various schools. And --

18 A So it was Survivors, obviously. That's
19 the only one on that list that isn't -- or that's
20 there that's on mine, as well.

21 Q Okay.

22 A Other than the other ones, but...

23 Q All right. So you recognize Survivors
24 Charter School on Ms. Roberts' school records?

25 A Yeah. That's what I'm saying. Since that

1 is the one on here, that's -- that's completely
2 clear. I could not remember if it was that one or
3 Gold Coast.

4 Q Okay. There is an entry date for
5 Ms. Roberts at Survivors Charter School of
6 10/12/2001, and a withdrawal on 3/7 of '02. Do you
7 see that?

8 A I mean, it's this; right? I mean, that's
9 the top.

10 Q The entry date of 10/12/01, withdrawal
11 3/7/02 at Survivors?

12 A Okay. I did not know what those
13 numbers -- I did not realize that that was a date.

14 Q I understand. And I know you did not make
15 this record.

16 So I'm just wanting to know if that's
17 consistent with your recollection, that you guys
18 went to school in the fall of 2001 until the --

19 A Yeah, that sounds about right.

20 Q -- March of 2002. It sounds right?

21 A Yeah.

22 Q And you both went to school together?

23 A Uh-huh (affirmative).

24 Q In the mornings?

25 A Yeah.

1 Q And got out of school at some earlier time
2 than a regular school day?

3 A Yeah.

4 Q Do you recall Ms. Roberts going to Royal
5 Palm Beach High? Again, this is in the 2001 time
6 frame.

7 A I -- I don't recall. I really don't.

8 Q Do you recall her, during the time you
9 were with her, taking any night classes at
10 Wellington High School?

11 A I don't recall.

12 Q Is it possible?

13 A It's a possibility.

14 MR. EDWARDS: Object to the form.

15 BY MS. MENNINGER:

16 Q Do you know whether Wellington has a night
17 school program?

18 A Like I said before, I don't know. They
19 could.

20 Q You went there in ninth grade?

21 A Yeah. It was during the day, though. I
22 have no clue about night school.

23 Q Got it.

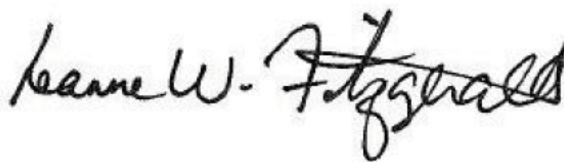
24 But you do have a memory about Survivors
25 Charter School?

CERTIFICATE OF OATH

STATE OF FLORIDA)
)
COUNTY OF FLAGLER)

I, the undersigned authority, certify that TONY
FIGUEROA personally appeared before me on
June 24, 2016, and was duly sworn.

WITNESS my hand and official seal this 5th day
of July, 2016.



Leanne W. Fitzgerald
Notary Public - State of Florida
My Commission No. FF060921
Expires: February 8, 2018

Digital Certificate Authenticated
By Symantec

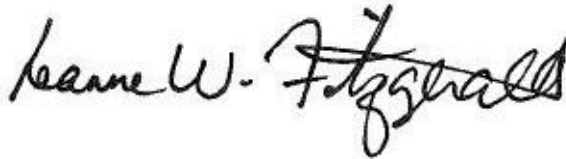
CERTIFICATE OF REPORTER

STATE OF FLORIDA)
)
COUNTY OF VOLUSIA)

I, Leanne W. Fitzgerald, Court Reporter, do hereby certify that I was authorized to and did stenographically report the deposition of TONY FIGUEROA; and that the foregoing transcript is a true record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 5th day of July, 2016.



Leanne W. Fitzgerald, FPR
Florida Professional Reporter

Digital Certificate Authenticated
By Symantec

EXHIBIT Q

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEO DEPOSITION OF
VIRGINIA GIUFFRE, VOLUME II

November 14, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

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Appearing on behalf of the Plaintiff

1 APPEARANCES: (Continued)

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By Laura Menninger, Esq.

3 Jeffrey S. Pagliuca, Esq.

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4 Denver, CO 80203

Phone: 303.831.7364

5 lmenninger@hmflaw.com

jpagliuca@hmflaw.com

6 Appearing on behalf of the

Defendant

7
Also Present:

8 Ann Lundberg, Paralegal

Maryvonne Tompkins, Videographer

Pursuant to Notice and the Federal Rules
of Civil Procedure, the continued video
deposition of VIRGINIA GIUFFRE, called by Defendant,
was taken on Monday, November 14, 2016, commencing at
8:04 a.m., at 150 East 10th Avenue, Denver, Colorado,
before Pamela J. Hansen, Registered Professional
Reporter, Certified Realtime Reporter and Notary
Public within Colorado.

* * * * *

I N D E X

VIDEO DEPOSITION OF VIRGINIA GIUFFRE, VOLUME II

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Exhibit 17 Amendment/Errata Sheet signed May 31, 2016 by Virginia Giuffre	540
Exhibit 18 Ad for Mar-a-Lago Club	548
Exhibit 19 The Mar-a-Lago Club, L.C. Employment Policies, October 28, 1995	549
Exhibit 20 Page from the Mar-a-Lago Club Employment Policies, Revised 10/2001	550

1 A Yes.

2 Q And you believe the Neiman Marcus was
3 located in which city?

4 A Well, it's around Fort Lauderdale. I
5 can't tell you exactly. Fort Lauderdale is so big,
6 like Broward County? Is that the word for it?

7 Q And what did you do at Neiman Marcus?

8 A I worked in the changing rooms.

9 Q And what did you do in the changing room?

10 A I think I just like -- if I remember
11 right, I just put clothes away that people left in
12 there. Probably went out to get sizes, different
13 sizes for women who wanted different sizes of the
14 same product.

15 Q And where did you work after Neiman
16 Marcus?

17 A Taco Bell.

18 Q Did you work at Southeast Employee
19 Management Company?

20 A I don't recognize that. I don't know if
21 that's a payroll company or what it is. I don't know
22 what Southeast -- what is it called?

23 Q Southeast Employee Management Company.

24 A No, I don't remember that.

25 Q Did you ever work as a temp?

1 A Not that I remember.

2 Q Going to different offices and filling in?

3 A No.

4 Q Did you work for Oasis Outsourcing?

5 A I don't -- I don't know if that's a
6 payroll company or if that's an actual place, but
7 that doesn't ring a bell.

8 Q Did you -- do you know how much you got
9 paid when you were working at places like Oasis
10 Outsourcing?

11 A Well, considering I don't know if I worked
12 at Oasis Outsourcing, I wouldn't even know how much I
13 got paid.

14 Q Did you review your Social Security
15 records?

16 A Yes.

17 Q You saw Oasis Outsourcing listed there?

18 A Right, but like I said, it doesn't even
19 ding a bell at all.

20 Q Do you know how much money they said you
21 made from them?

22 MS. MCCAWLEY: Objection. If you want to
23 show her the documents, she can see what amount is
24 listed and answer your questions, but if you're not
25 going to show her the document, that's the best she

1 don't know where I was living.

2 Q Okay. Did you indicate whether you had
3 gone to school?

4 A Yes, I did.

5 Q What did you indicate?

6 A I indicated that I attended Survivors
7 Charter School for four years and had a high school
8 diploma.

9 Q And you graduated?

10 A Well, I didn't. I just wanted to get a
11 job, and I wanted it to look good, so I fluffed it
12 up.

13 Q So you wrote that down in your handwriting
14 on this application, correct?

15 A I did.

16 Q And it was not true, correct?

17 A Again, I'm not proud of it. I just didn't
18 have any other way of getting a job and I just
19 thought if I put that down there, I might be
20 considered.

21 Q You indicated when you were younger you
22 volunteered for six years at a riding clinic. What's
23 the name of the riding clinic?

24 A Vince Ramos. And I'm not too sure if it
25 was six years, but I started off there quite young,

1 a former employer is the Indigo Bar and Grill,
2 correct?

3 A Yes.

4 Q Is that true?

5 A No, it was not.

6 Q On the page before that, it indicates you
7 went to Royal Palm Beach High School. Is that in
8 your handwriting?

9 A Yes, it is.

10 Q And it says you went for four years and
11 you graduated?

12 A Yes.

13 Q In your handwriting?

14 A Yes.

15 Q Is that true?

16 A No.

17 Q This was an application you filled out in
18 January of 2014, correct?

19 A Correct.

20 Q The page before that is your -- portion of
21 your resume I think we have previously discussed, but
22 just confirming, you did send that resume to this job
23 application, correct?

24 A I did.

25 Q And you indicated you had worked at

1 STATE OF COLORADO)

2) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER)

4 I, Pamela J. Hansen, do hereby certify that
5 I am a Registered Professional Reporter and Notary
6 Public within the State of Colorado; that previous to
7 the commencement of the examination, the deponent was
8 duly sworn to testify to the truth.

9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.

14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.

18 In witness whereof, I have affixed my
19 signature this 23rd day of November, 2016.

20 My commission expires September 3, 2018.

21
22
23 Pamela J. Hansen, CRR, RPR, RMR
24 216 - 16th Street, Suite 600
25 Denver, Colorado 80202

EXHIBIT R

SSA-1826

ITEMIZED STATEMENT OF EARNINGS

SOCIAL SECURITY ADMINISTRATION
OFFICE OF CENTRAL OPERATIONS
6100 WABASH AVENUE
BALTIMORE MARYLAND 21215

Date: 10/25/2016

|||||
BOIES SCHILLER AND FLEXNER
401 E LAS OLAS BLVD STE 1200
FORT LAUDERDALE FL 33301-2211

We are sending the statement of earnings requested for:

Number Holder's Name: VIRGINIA GIUFFRE
Social Security Number: [REDACTED]

Years Requested: 1998 THRU 2002; 2013 THRU 2015

Control Number: 16294125319
Remittance Number: 201610240012

Enclosure(s):
Earnings Statement

GIUFFRE009175

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SSA-1826

ITEMIZED STATEMENT OF EARNINGS

SOCIAL SECURITY ADMINISTRATION
EARNINGS RECORD INFORMATION

Date: 10/25/2016

Our records show the amount of earnings reported, not the amount of Social Security taxes that were paid.

Wages were first covered under Social Security in 1937. Therefore, 1937 is the first year for which earnings may be shown on our records. Employers were required to report earnings semi-annually in 1937, and on a quarterly basis for the years from 1938 through 1977. Beginning with 1978, employers are required to report earnings annually.

Our records do not show the exact date of employment (month and day) because we do not need this information to figure Social Security benefits. Employers do not give us this information.

Each year, there is a maximum amount of earnings that is subject to Social Security taxes and is used to compute benefits. If a person earns more than this maximum amount, the earnings statement will usually show the maximum rather than the total earnings. Maximum benefits can be found on the SSA website.
<http://www.ssa.gov/OACT/COLA/cbb.html>

Beginning in 1951, self-employed persons could also receive Social Security credit for their work. The maximum amounts of self-employment earnings that are subject to Social Security taxes and are used to compute benefits can also be found on the SSA website.
<http://www.ssa.gov/OACT/COLA/cbb.html>

If you have any questions, you should call, write, or visit any Social Security office. If you visit or call, please bring this letter. It will help us answer questions. The toll free number to call is 1-800-772-1213 (for the deaf or hard of hearing, call our TTY number, 1-800-325-0778).

GIUFFRE009176

CONFIDENTIAL

SSA-1826

ITEMIZED STATEMENT OF EARNINGS
* * * FOR SSN [REDACTED] * * *

FROM: SOCIAL SECURITY ADMINISTRATION
OFFICE OF CENTRAL OPERATIONS
6100 WABASH AVENUE
BALTIMORE MARYLAND 21215

NUMBER HOLDER NAME: VIRGINIA GIUFFRE
YEARS REQUESTED: 1998 THRU 2002; 2013 THRU 2015

BOIES SCHILLER AND FLEXNER
401 E LAS OLAS BLVD STE 1200
FORT LAUDERDALE FL 33301

EMPLOYER NUMBER: [REDACTED]
KFC USA INC
% PAYROLL DEPT
5200 COMMERCE CROSSING DR
LOUISVILLE KY 40229-2182

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					\$140.70

EMPLOYER NUMBER: [REDACTED]
PUBLIX SUPER MARKETS INC
PO BOX 32018
LAKELAND FL 33802-2018

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					\$216.69

EMPLOYER NUMBER: [REDACTED]
ASCENSION CHILD CARE CENTER
ASCENSION PEACE CHILD CARE CENTER
2701 N STATE ROAD 7
LAUD LAKES FL 33313-2731

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					\$216.97

SSA-1826

ITEMIZED STATEMENT OF EARNINGS

* * * FOR SSN [REDACTED] * * *

EMPLOYER NUMBER: [REDACTED]
 AVICULTURAL BREEDING & RESEARCH
 CENTER
 % ERNEST LAKS
 14201 125TH AVE N
 WEST PALM BCH FL 33418-7945

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$99.48

EMPLOYER NUMBER: [REDACTED]
 SOUTHEAST EMPLOYEE MANAGEMENT
 COMPANY
 2559 PALM DEER DR
 LOXAHATCHEE FL 33470-2563

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$3,212.44

EMPLOYER NUMBER: [REDACTED]
 MAR-A-LAGO CLUB LLC
 TRUMP DONALD J GEN PTR
 % TRUMP ORGANIZATION
 1100 S OCEAN BLVD
 PALM BEACH FL 33480-5004

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$1,866.50

EMPLOYER NUMBER: [REDACTED]
 OASIS OUTSOURCING VI INC
 2054 VISTA PKWY STE 300
 WEST PALM BCH FL 33411-6742

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$2,037.60

EMPLOYER NUMBER: [REDACTED]
 NEIMAN-MARCUS GROUP LLC
 % NEIMAN MARCUS GROUP LTD SOLE MBR
 1201 ELM ST
 DALLAS TX 75270-2102

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$1,440.79

SSA-1826

ITEMIZED STATEMENT OF EARNINGS

* * * FOR SSN [REDACTED] * * *

EMPLOYER NUMBER: [REDACTED]
 MANNINOS INC
 MANNINOS RESTAURANT
 12793 B W FOREST HILL BLVD
 WEST PALM BEACH FL 33414-4749

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2001					\$212.00

EMPLOYER NUMBER: [REDACTED]
 CCI OF ROYAL PALM INC
 % ROBERT FURR TTEE
 2255 GLADES RD STE 337-W
 BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$403.64

EMPLOYER NUMBER: [REDACTED]
 ROADHOUSE GRILL INC
 ROBERT C FURR TTEE IN BANKRUPTCY
 2255 GLADES RD STE 337W
 BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$1,247.90

EMPLOYER NUMBER: [REDACTED]
 MARC PINKWASSER DVM PA
 13860 WELLINGTON TRCE STE 31
 WELLINGTON FL 33414-8541

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$1,561.75

EMPLOYER NUMBER: [REDACTED]
 GREAT OUTDOORS PREMIER RV-GOLF
 RESORT COMMUNITY SVC ASSOC INC
 145 PLANTATION DR
 TITUSVILLE FL 32780-2528

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2014					\$171.83

SSA-1826

ITEMIZED STATEMENT OF EARNINGS
* * * FOR SSN [REDACTED] * * *

***** THERE ARE NO OTHER EARNINGS RECORDED UNDER THIS *****
***** SOCIAL SECURITY NUMBER FOR YEAR(S) REQUESTED *****

PAGE 4

GIUFFRE009180

CONFIDENTIAL

EXHIBIT S



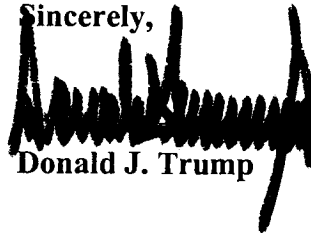
January 30, 2003

To Whom It May Concern,

Skye Roberts has been a most valuable employee at The Mar-a-Lago Club since April of 2000. While employed as a maintenance crew team member, he has been responsible for maintaining the five championship red-clay tennis courts as well as keeping all of the individual air conditioning units working and in tip-top shape.

It is my understanding that Skye is relocating to Colorado. Should he ever return to Florida, he would be eligible for re-hire.

Sincerely,



Donald J. Trump

The Mar-a-Lago Club, L.C.

PALM BEACH, FLORIDA

1100 South Ocean Boulevard, Palm Beach, Florida 33480 (407) 832-2600 Fax (407) 832-2669

MAR-A-LAGO-0001

TERMINATIONS

LAST NAME	FIRST NAME	
Abbott	Philip	Box #1
Acevedo	Michael	Box #4
Adams	Zane	Box #3
Adams	Cynthia	Box #1
Adams	Patrick	Box #1
Addison	Andrea	Box #4
Adelfio	Peter	Box #4
Adler	Jessica	Box #1
Aldahondo	Francisco	Box #6
Alexis	Genicia	Box #3
Allen	Suzanne	Box #1
Almeida	Tiberio	Box #4
Almgren	Shane	Box #3
Alves	Victor	Box #4
Anaya	Orlando	Box #4
Anderson	Sandra	Box #6
Andres-Felix	Francisco	Box #4
Annunziata	Susan	Box #3
Anton	Frank	Box #1
Aquino	Jorge	Box #4
Argueta	Irma	Box #3
Armstrong	April	Box #4
Ash	Carol	Box #6
Ashenbrenner	William	Box #3
Auguste	Firenze	Box #6
Bacon	John	Box #4
Bader	Susan	Box #1
Bader	Erwin	Box #1
Baghouli	Adel	Box #6
Bahena	Lucio	Box #6
Baker	Teresa	Box #3
Balkunas	Vicki	Box #6
Banks	Michael	Box #4
Baranek	Katherine	Box #3
Baron	Todd	Box #6
Barr	James	Box #4
Barr	Gail	Box #1
Barrett	Loraine	Box #3
Barrill	London	Box #3
Beam	Stephen	Box #6
Beaudoin	Louis	Box #1
Beckett	Sam	Box #3
Benarroch	Alice	Box #1
Bend	John	Box #1
Benitez	Sixta	Box #3
Bennett	Thomas	Box #3
Benney	Tabitha	Box #3
Benoit	Mark	Box #1
Bernal	Ana	Box #6

TERMINATIONS

LAST NAME	FIRST NAME	
Bernhardt	Gretchen	Box #1
Berube	Michael	Box #4
Beswick	Allan	Box #6
Beverly	Tim	Box #4
Bezwiechin	Cham	Box #3
Blake	Howard	Box #3
Bloch	Michael	Box #3
Blyth	Alison	Box #6
Bobrowski	Michele	Box #3
Bocksch	Kristy	Box #4
Boehm	Erica	Box #3
Boettcher	Joe	Box #6
Bogert	Debra	Box #3
Boisvert	Cory	Box #1
Bonilla	Jose	Box #4
Bork	Allen	Box #4
Borrego	Sandra	Box #4
Borrell	Salvator	Box #1
Borrelli	Lisa	Box #6
Boudreau	Matthew	Box #4
Boukhalfa	Said	Box #6
Bouschet	Courtney	Box #4
Brass	Baysson	Box #1
Brassler	Chris	Box #1
Brendel	Kendra	Box #6
Brennan	Mary	Box #1
Briante	Gerard	Box #1
Bridger	Jody	Box #3
Briggs	Jacqueline	Box #1
Brown	Eleanor	Box #6
Brown	William	Box #6
Brummel	Denis	Box #3
Bryan	Amy	Box #1
Bryant	William	Box #4
Buckingham	Annette	Box #1
Buckley	Cynthia	Box #4
Budziak	Diane	Box #1
Burdett	Jill	Box #6
Burgess	Lawrence	Box #3
Burgon	Helya	Box #6
Burke	Maureen	Box #4
Burke	Christopher	Box #4
Burlew	Gary	Box #1
Burton	Myles	Box #3
Butler	Michael	Box #4
Calder	Malgorzata	Box #3
Caldwell	Karen	Box #1
Camacho	Darren	Box #4
Camilleri	Mark	Box #4

TERMINATIONS

LAST NAME	FIRST NAME	
Campbell	Benjamin	Box #3
Candella	Charles	Box #4
Cantrell	Dantelle	Box #4
Capozzi	Christina	Box #4
Carlisle	Kevin	Box #1
Carr	Janet	Box #3
Carroll	VALerie	Box #4
Carvalho	Deo	Box #3
Casher	Jeremy	Box #1
Castano	Ku	Box #4
Castillo	Sandra	Box #6
Castro	Juan	Box #4
Catranbone	Angela	Box #1
Cavinee	Krystal	Box #4
Celestin	Jean	Box #3
Chambers	Craig	Box #1
Chapuis	Rene	Box #1
Charles	Fresnel	Box #6
Charles	Sylfida	Box #6
Chillingsworth	Vanette	Box #6
Chioffe	James	Box #1
Christie	Michael	Box #4
Ciaffone	Cora	Box #6
Ciccio	John	Box #3
Clark	Kimberly	Box #1
Cleveland	Trisha	Box #6
Cloninger	Tana	Box #3
Coffman	Connie	Box #4
Cohen	Julius	Box #6
Cole	Joanne	Box #1
Collins	Yvette	Box #1
Collins	Barbara	Box #1
Conroy	James	Box #4
Cordero	Vera	Box #1
Cordero	Vero	Box #1
Cortes	Roberto	Box #3
Corti	Debra	Box #3
Coutts	Rachael	Box #1
Cox	Emory	Box #1
Cronin	Sonia	Box #6
Cross	Deborah	Box #6
Crostit	Barbara	Box #4
Crowley	Tricia	Box #6
Cruz	Lonjino	Box #6
Cruz	Israel	Box #6
Crystle	Joshua	Box #4
Cuervo	Anamaria	Box #4
Cummings	Meghan	Box #6
Curran	Maureen	Box #1

TERMINATIONS

LAST NAME	FIRST NAME	
Czerniak	Anthony	Box #4
Daley	Chad	Box #6
Damiano	Anthony	Box #4
Davis	Jeremy	Box #4
Davis	Eric	Box #1
Deak	Stephen	Box #6
Dean	Laurie	Box #6
Deleon	Elais	Box #4
Delia	Frank	Box #4
Dellay	Scott	Box #1
DeLorenzo	Mark	Box #6
DeNarvaez	Claudia	Box #3
DePaula	Danielle	Box #4
DeRiso	Gina	Box #1
DeSernia	Sulamita	Box #3
Devine	Keith	Box #1
DeVito	Dawn	Box #1
DiBenedetto	Melissa	Box #3
Dickens	George	Box #6
Dieu Donne	Jean Charles	Box #4
Dimitrova	Violeta	Box #3
Dodge	Virginia	Box #1
Dombayci	Yimaz	Box #6
Domnick	Mark	Box #1
Donnelly	Jennie	Box #3
Dorsa	Antonio	Box #1
Drake	Charlie	Box #6
Drogowski	David	Box #6
Dubois	Lydia	Box #4
Dubois	Crystal	Box #6
Dumstra	Adam	Box #6
Eaton	Adam	Box #4
Edge	Jerod	Box #4
Edwards	Don	Box #4
Egger	Paul	Box #6
Elkhoury	Toni	Box #6
Ellingworth	David	Box #6
Ellis	Christine	Box #1
Elwell	Douglas	Box #1
Enger	Mark	Box #3
English	Mistie	Box #3
Espinoza	Francisca	Box #4
Espinoza	Henner	Box #3
Espinoza	Carlos	Box #6
Estime	Karl	Box #1
Ettehad	Shahla	Box #4
Faaland	Roy	Box #1
Faba	Juan	Box #1
Fagen	Lanell	Box #1

TERMINATIONS

LAST NAME	FIRST NAME	
Faraci	Franklin	Box #1
Fasel	Jeremy	Box #4
Faulk	Joel	Box #1
Feal	Jose	Box #4
Feick	Gretchen	Box #4
Fein	Lawrence	Box #1
Fernandez	Jose	Box #6
Ferree	Tonya	Box #3
Fesser	Michael	Box #1
Fidanovic	Novak	Box #6
Figueroa	Irina	Box #3
Filippone	Vittorio	Box #4
Finch	Michael	Box #1
Finckenor	George	Box #4
Fink	Roger	Box #4
Fiorentino	Maria	Box #4
Firat	Turabi	Box #1
Fischbach	Nora	Box #3
Fischer	Rosemary	Box #4
Fiumara	Michele	Box #3
Flores	Pedro	Box #3
Folmer	Ronald	Box #1
Foss	John	Box #1
Fox	Lisa	Box #6
Francoeur	Mary Lou	Box #6
Fratus	Donna	Box #3
Frelich	Jason	Box #6
Frey	Kenneth	Box #4
Friday	Jennifer	Box #6
Frith	Cynthia	Box #1
Fritz	John	Box #1
Frost	Mark	Box #1
Gacon	Allan	Box #1
Galla	Galla	Box #1
Galloway	Kurt	Box #6
Galloza	Sergio	Box #3
Garcia	Souad	Box #6
Garcia-Douglas	Marcia	Box #6
Garrido	Dante	Box #4
Gedeum	Rosalie	Box #3
Gell	William	Box #3
Gervais	Marie	Box #6
Getgood	Russell	Box #1
Gibeault	Larry	Box #1
Gillie	Barbara	Box #1
Gividen	Nathan	Box #1
Glass	Kevin	Box #1
Goicochea	Darcy	Box #6
Goldrich	Amanda	Box #3

TERMINATIONS

LAST NAME	FIRST NAME	
Golemis	Sam	Box #3
Gomaa	Ashraff	Box #6
Gonzales	Augustine	Box #4
Gonzales	Dora	Box #4
Gonzalez	Raul	Box #3
Gonzalez	David	Box #1
Gonzalez	Elsa	Box #1
Gonzalez	Alex	Box #6
Goodman	William	Box #4
Goupy	Bernad	Box #6
Gowdy	Charles	Box #1
Granjales	Myriam	Box #6
Grant	Everton	Box #4
Grasso	William	Box #3
Graves	Erika	Box #4
Green	Michelle	Box #1
Greene	James	Box #1
Greenwood	Elizabeth	Box #1
Gregson	Scott	Box #3
Grieve	Daniel	Box #3
Griffin	Mark	Box #1
Griffin	Michael	Box #1
Griffiths	Sandra	Box #1
Griggs	Dora	Box #3
Grosso	Peter	Box #1
Guerin	Jean	Box #1
Gutierrez	Mauricio	Box #1
Gutierrez	Porfidio	Box #1
Gutierrez	Antonio	Box #3
Guyierrez	Warren	Box #6
Hader	Karen	Box #3
Hagen	Kyla	Box #1
Haggar	Karen	Box #3
Hamby	Michael	Box #1
Harris	Dan	Box #6
Hartsough	Cheryl	Box #1
Hatch	Wendy	Box #1
Hatfield	Michael	Box #1
Havican	Robert	Box #6
Heanssler	Pete	Box #3
Hefel	Eric	Box #6
Hemings	Romy	Box #6
Hennessee	Jason	Box #3
Hernandez	Gladys	Box #3
Hernandez	Alexander	Box #3
Hernandez	Luis	Box #3
Herrara	Julio	Box #4
Herth	Francesca	Box #3
Higgins	Jennifer	Box #4

TERMINATIONS

LAST NAME	FIRST NAME	
Higgs	Kathleen	Box #1
Hill	Donna	Box #4
Hill	Samuel	Box #1
Hinkin	Cynthia	Box #3
Ho	Stella	Box #1
Hochong	Anthony	Box #6
Hodes	Robin	Box #4
Holcomb	Mary	Box #3
Holryid	Mary	Box #1
Homenuik	Wilfred	Box #6
Hong	David	Box #6
Hopkins	Victoria	Box #6
Horsky	George	Box #3
Hossain	Mohammed	Box #1
Hoyle	Patricia	Box #4
Huber	Frank	Box #4
Huguet	Roberto	Box #3
Hulsey	Thomas	Box #4
Hutchins	Marguerite	Box #4
Hyde	Rose	Box #6
Hylton	Longsworth	Box #6
Ibrahim	Ashraf	Box #4
Infante	Carlos	Box #4
Insani	Mark	Box #3
Ioli	Gina	Box #4
Irvine	Marche	Box #3
Jacob	Maureen	Box #1
Jacobs	Rick	Box #1
Jacques	Dudley	Box #1
Jacques	Nixon	Box #6
Jaferali	Errol	Box #4
James	Buddy	Box #6
Jankowski	Keith	Box #1
Jaramillo	Olmes	Box #1
Jean	Jacques	Box #6
Jenkins	Todd	Box #4
Jespersion	Henrik	Box #3
Johnansen	Elise	Box #6
Johnson	Eric	Box #4
Johnson	Josh	Box #4
Johnson	Chad	Box #1
Johnson	Debbie	Box #1
Johnson	Laura	Box #1
Johnson	Jade	Box #1
Johnson	Walter	Box #1
Johnson	Cathiejo	Box #6
Jones	Steve	Box #4
Jones	Regina	Box #3
Joseph	Elisca	Box #6

TERMINATIONS

LAST NAME	FIRST NAME	
Juan	Miguel Tomas	Box #4
Juan	Angelina	Box #6
Kaiser	Stephen	Box #4
Kalson	Vince	Box #1
Kapreilian	Peter	Box #4
Karius	Michael	Box #4
Kaufman	Robert	Box #1
Keady	Mike	Box #1
Keiser	Lisa	Box #4
Keller	Mikchael	Box #4
Kelley	Nancy	Box #1
Kelly	Lois	Box #4
Kelly	John	Box #1
Kennedy	Sean	Box #3
Kenney	Marlou	Box #3
Kenny	Brian	Box #4
Kent	Scott	Box #4
Kincl	Joseph	Box #4
King	Helen	Box #4
King	Jeffrey	Box #3
King	Michael	Box #6
Kirby	Brian	Box #1
Kleinfeld	Robert	Box #1
Kline	Eileen	Box #6
Kole	Karen	Box #4
Kowalski	Susan	Box #1
Kresic	Blago	Box #1
Krogman	Terry	Box #1
Krpina-Zito	Marija	Box #4
Kruppenbacher	Michael	Box #6
Kuiper	Gary	Box #3
Kuntz	Carlson	Box #4
LaCerte	Troy	Box #1
Laidlaw	Kenneth	Box #3
Laine	Brent	Box #6
Laing	Melissa	Box #6
Lang	Eric	Box #4
Langford	Chad	Box #6
Langweiler	Albert	Box #1
Lanunziata	Stacia	Box #6
Laskaris	Alexandra	Box #1
Laufenberg	Lynette	Box #1
Lawlor	Thomas	Box #3
Lefrancois	Aaron	Box #3
Leite	Paulo	Box #1
Leitzell	jTara	Box #4
Leone	Nick	Box #1
Leonova	Victoria	Box #6
LeRoux	Marthinus	Box #6

TERMINATIONS

LAST NAME	FIRST NAME	
Lester	Carolina	Box #6
Lewis	Corey	Box #1
Leyden	Gene	Box #6
Liberte	Monney	Box #3
Lightbourne	Andrianne	Box #1
Lisec	Lisa	Box #1
Locke	Michelle	Box #3
Logalbo	Franklin	Box #6
Lopez	Claudio	Box #4
Lopez	Julian	Box #3
Lopez	Marvin	Box #3
Lopez	Mario	Box #6
Lopez	Roger	Box #6
Love	Rena	Box #3
Lowe	Karl	Box #3
Lugo	Christianne	Box #3
Lusse	Robert	Box #1
Luxton	Stephanie	Box #4
Lyle	Mary Jane	Box #6
Lynam	Robert	Box #6
Lynch	Cheri	Box #3
MacDonnell	Thomas	Box #7
Machado	Carlos	Box #4
Magerus	Georges	Box #4
Malay	Maya	Box #3
Maldonado	Juvencio	Box #1
Maldonaldo	James	Box #7
Mann	Andrew	Box #3
Mannion	Deidre	Box #4
Marcenaro	Eduardo	Box #1
Marchman	Henry	Box #4
Marino	Mindy	Box #1
Marrone	Kimberly	Box #3
Marshall	John	Box #7
Martinez	Steve	Box #1
Martinez	Zach	Box #7
Martinez	Hector	Box #7
Massias	Caroline	Box #4
Mateo	Alfredo Lucas	Box #1
Maurice	Marie	Box #3
Max	Susan	Box #1
Maxwell	Terence	Box #7
McAlees	Brook	Box #4
McBrayer	Cassandra	Box #1
McCabe	Kevin	Box #3
McCambridge	Angela	Box #1
McCann	Kevin	Box #3
McCarthy	Shannon	Box #3
McConnell	James	Box #4

TERMINATIONS

LAST NAME	FIRST NAME	
McCormick	Jennifer	Box #7
McDaniel	Elizabeth	Box #4
McDonald	Amanda	Box #3
McDonald	Deborah	Box #1
McFarland	Robert	Box #4
McGreevy	Barbara	Box #1
McKee	Wende	Box #4
McKeen	Nohora	Box #3
McKim	Mark	Box #1
McLean	Stephen	Box #4
McMahon	Leo	Box #7
McMiled	Patricia	Box #3
McNaughton	Sean	Box #7
McNicholas	Marie	Box #3
Mead	Paul	Box #7
Meade	Raymond	Box #1
Mena	Arturo	Box #1
Merchant	Kenneth	Box #4
Merriman	Rita	Box #7
Mesa	Uenoi	Box #3
Messemer	Brian	Box #4
Metayer	Edenes	Box #4
Metayer	Marie	Box #1
Michaels	Jesse	Box #7
Michel	Bernadette	Box #7
Miller	Eric	Box #3
Miller	Lisa	Box #3
Miller	Ronald	Box #7
Milosevic	Sas	Box #1
Miranda	Cari	Box #7
Mitchell	Edward	Box #4
Mohamed	Waleid	Box #4
Monaco	Lettia	Box #1
Monia	Gregory	Box #1
Monson	Jill	Box #7
Montano	Helmuth	Box #4
Montano	Henry	Box #4
Montecinos	James	Box #4
Moore	Joel	Box #2
Moran	Tom	Box #7
Moree	Darlene	Box #4
Moreno	Aura	Box #3
Morgan	Todd	Box #2
Morgan	Jennifer	Box #7
Morris	Katherine	Box #3
Morris	Rebecca	Box #7
Mosher	Neil	Box #2
Moss	William Coury	Box #4
Mullen	Sony	Box #7

TERMINATIONS

LAST NAME	FIRST NAME	
Mullen	Cheryl	Box #7
Munford	Cheryl	Box #7
Munoz	Mariadelrocio	Box #4
Musallet	Hassan	Box #2
Musso	Diane	Box #7
Myers	Louisa	Box #3
Myers	Linda	Box #7
Nagy	Matthew	Box #4
Nagy	Viktoria	Box #7
Nakoneczny	Dawn	Box #4
Narleski	Linda	Box #2
Nasie	Waleed	Box #7
Natal	Luis	Box #3
Neira	Fernando	Box #3
Nelsen	Holly	Box #2
Nelson	Lisa	Box #3
Nemets	Tammie	Box #3
Nieporte	Joseph	Box #4
Noe	Thomas	Box #7
Noel	Marie	Box #7
Nolan	Susan	Box #2
Northern	Brad	Box #7
Noufal	Michel	Box #2
O'Boyle	Thomas	Box #7
Oconnor	Kevin	Box #2
Oesterling	Emily	Box #7
Oldfield	Janice	Box #2
Oliver	Meike	Box #4
O'Neill	Kathryn	Box #2
O'Neill	William	Box #2
O'Neill	Joseph	Box #7
Orozco	Clemente	Box #3
Pagen	Mitchel	Box #2
Pagliaro	Peter	Box #4
Palomba	Amanda	Box #2
Parker	Sandra	Box #3
Parker	Everett	Box #2
Parkinson	Nicole	Box #4
Pavelka	Nathan	Box #2
Pavonni	Michelle	Box #2
Pedro	David	Box #4
Peison	Brenda	Box #7
Pelaez	Juan	Box #2
Penate	Alexander	Box #4
Perez	Marlow	Box #4
Perkins	Tian	Box #4
Perrey	Arielle	Box #2
Pesasico	Crispin	Box #4
Petery	Pamela	Box #7

TERMINATIONS

LAST NAME	FIRST NAME	
Petrillo	Camille	Box #3
Pharr	Stephanie	Box #4
Philips	Ralph	Box #3
Pickens	Robert	Box #2
Pientka	John	Box #2
Pierre-Noel	Yvonne	Box #4
Pinder	Patricia	Box #7
Pine	Jon	Box #3
Pino	Alex	Box #7
Pinto	Julie	Box #2
Piques	Christian	Box #7
Pisani	Craig	Box #2
Pisani	Nicholas	Box #2
Pitot	Patrick	Box #3
Pittinger	Mark	Box #4
Pitts	Jeremiah	Box #2
Plaine	Victoria	Box #3
Ponder	Janet	Box #3
Poston	Roberta	Box #4
Powell	Nicole	Box #3
Powell	Kelley	Box #7
Presto	Nicholas	Box #4
Price	Robin	Box #2
Prouty	Joy	Box #2
Prucien	Mona	Box #3
Quigley	Christy	Box #7
Quirao	Maria	Box #4
Rafrano	Dawn	Box #2
Ragland	Leslie	Box #2
Ramirez	Roxana	Box #2
Ramos	Milka	Box #3
Raphael-Dallas	Jamie	Box #3
Reardon	Lisa	Box #2
Reasinger	Amy	Box #2
Redmond	Suzanne	Box #2
Reed	Diana	Box #4
Reich	Gwendalyn	Box #2
Reil	Richard	Box #2
Reis	Brian	Box #7
Reis	Charles	Box #7
Reiser	Scott	Box #7
Rene	Josette	Box #4
Rene	Jean	Box #7
Rene	Lamercie	Box #7
Rennie	Kerry	Box #2
Reyes	Randolfo	Box #4
Reynolds	Janice	Box #7
Ribeiro	Gregg	Box #3
Richardson	Brian	Box #7

TERMINATIONS

LAST NAME	FIRST NAME	
Rinker	Ross	Box #7
Rivera	Pablo	Box #3
Rivera	Eduardo	Box #2
Rivero	Alicia	Box #7
Robbins	Jody	Box #4
Roberts	Virginia	Box #4
Roberts	Walter	Box #4
Roberts	Diane	Box #3
Robsham	Lydie	Box #7
Rodriguez	Francisco	Box #4
Rodriguez	Abel	Box #3
Rodriguez	Kenia	Box #3
Rodriguez	Aristalia	Box #2
Rogers	Howard	Box #2
Romeus	Melege	Box #2
Rony	Jean	Box #2
Roqueta	Maria	Box #2
Rose	Cheryl	Box #2
Rosenberg	Bradley	Box #2
Rosier	Sandra	Box #2
Rotchford	Bernadette	Box #4
Rubio	Pascual	Box #2
Rueda	Maria	Box #4
Ruiz	Juan	Box #2
Russeau	Heidi	Box #4
Russell	Kathryn	Box #4
Russotto	Vincent	Box #7
Ryan	Megan	Box #2
Ryan	Michael	Box #7
Saint Gerard	Manes	Box #7
Saint Surin	Jacquest	Box #2
Salloum	Adib	Box #2
Salman	David	Box #2
Salvador	Marian	Box #2
Sanford	Kevin	Box #5
Santos	Elimos	Box #2
Sasaki	Shoko	Box #7
Saunders	Sarah	Box #2
Savage	Angelia	Box #5
Savoie	Terry	Box #2
Scanlan	Peter	Box #5
Schlechter	Melissa	Box #5
Schmantowsky	Craig	Box #2
Schoonover	Richard	Box #2
Schroeder	Glenn	Box #5
Schumacher	Patricia	Box #2
Schwab	Emily	Box #2
Scotland	Jaycen	Box #7
Scott	Cecelia	Box #2

TERMINATIONS

LAST NAME	FIRST NAME	
Seebauer	Gina	Box #7
Seesholtz	Joseph	Box #2
Sellas	William	Box #2
Serpico	Joseph	Box #2
Sevilla	Carlos	Box #5
Shaw	Tammy	Box #7
Shelhamer	Sage	Box #7
Shepherd	Michael	Box #7
Shields	Catherine	Box #2
Shumate	Regis	Box #5
Shumpis	David	Box #7
Similien	Raymond	Box #2
Simms	Amanda	Box #7
Simpson	Robert	Box #7
Sineni	Sandra	Box #2
Singerline	Thomas	Box #2
Skinner	Troy	Box #2
Sluzenski	Jonathan	Box #7
Smith	Jeremiah	Box #5
Smith	Ivan	Box #5
Smith	Meadow	Box #2
Smith	Debbie	Box #2
Smith	Elizabeth	Box #2
Smith	Fred	Box #2
Snyder	Lisa	Box #7
Soler	Luis	Box #2
Soliman	Alex	Box #2
Sosa	Anian	Box #7
Southall	Ginger	Box #2
Souza	Robert	Box #2
Spencer	Sxott	Box #2
Sprague	Steven	Box #2
Springer	Timothy	Box #2
Stanfield	Todd	Box #5
Staniszewski	Casey	Box #7
Stankunas	Jolanta	Box #7
Stanley	Lisa	Box #2
Sta-Rosa	Jaime Lindo	Box #2
Steinberg	Kathleen	Box #2
Steinhaus	Cynthia	Box #2
Steliga	Stephanie	Box #5
Stenger	Stuart	Box #2
Stephans	Dorian	Box #2
Stewart	Selvin	Box #2
Strohmingner	Matthew	Box #2
Stuart	Susan	Box #2
Stuhr	Kenneth	Box #2
Sturtevant	Charles	Box #5
Sucur	Nicholas	Box #7

TERMINATIONS

LAST NAME	FIRST NAME	
Sullivan	Judith	Box #2
Sumpter	Drew	Box #2
Swan	Pyson	Box #5
Sweeney	Bridget	Box #5
Swiderski	Richard	Box #2
Swiderski	Mark	Box #2
Sylne	Romel	Box #2
Tan	Priscilia	Box #2
Tarantino	Vincenzo	Box #2
Tatum	Christopher	Box #7
Taylor	Kevin	Box #5
Tempfli	Glenn	Box #2
Thelemaque	Jierre	Box #5
Thibeault	William	Box #7
Thiel	Kurt	Box #2
Thiel	Ryan	Box #2
Thomas	Edward	Box #2
Thompson	Derek	Box #2
Thompson	Christine	Box #2
Tomer	Mary	Box #2
Tonge	Al	Box #5
Torres	Frank	Box #5
Torres	Iris	Box #7
Toussant	Elby	Box #7
Trevino	Danielle	Box #2
Tsitsirides	Alex	Box #5
Tucker	Marie	Box #7
Uljić	Gjon	Box #2
Umpierre	Frances	Box #7
Valdez	Bridges	Box #2
Valdez	Julie	Box #2
Valenti	Paul	Box #2
Vandersloot	Mildred	Box #5
VanVliet	Jane	Box #2

TERMINATIONS

LAST NAME	FIRST NAME	
Vasquez	Sosmar	Box #5
Vasquez	Christian	Box #2
Vaughn	Matthew	Box #2
Velasquez	Rodolfo	Box #2
Vidalis	Chantal	Box #2
Voluck	Justin	Box #2
Vyskrebentsev	Aleksey	Box #5
Wahl	Steven	Box #5
Walker	Sylvia	Box #7
Walkowiak	Toni	Box #7
Wallace	Philip	Box #2
Ward	Terry	Box #5
Webb	Jacob	Box #7
Weber	Ronald	Box #2
Weidner	James	Box #7
Weisman	Brian	Box #2
Wentworth	Gayle	Box #2
Weslowski	Elaine	Box #2
White	Scott	Box #5
Whitley	Deborah	Box #7
Whitney	Moriah	Box #7
Whittle	Tamara	Box #2
Wilburn	Jennifer	Box #2
Williams	Arhon	Box #2
Williams	Gretchen	Box #2
Williams	Jacqueline	Box #2
Williams	Ellen	Box #7
Williams	Kristin	Box #7
Willoughby	William	Box #2
Willson	Howard	Box #5
Willson	Joseph	Box #2
Woolf	Elena	Box #2
Wynn	Beverly	Box #2
Yancey	Kathryn	Box #2
Yancey	Scott	Box #7
Yeskey	Dean Martin	Box #5
Young	Todd	Box #2
Zervoulis	Matthew	Box #2
Zivkovic	Milo	Box #2
Zorn	Christopher	Box #7
Zwick	Danielle	Box #2

Box #1 1998 terms
 Box #2 1998 & 1999 terms
 Box #3 1999 terms
 Box #4 2000 terms
 Box #5 2000 terms
 Box #6 2001 terms

TERMINATIONS

LAST NAME	FIRST NAME
Box #7	2001 terms

EXHIBIT T

UNITED STATES DISTRICT COURT
for the
Southern District of New York

Civil Action No. 15-cv-07433-RWS

VIRGINIA GIUFFRE,

Plaintiff,

vs.

GHISLAINE MAXWELL,

Defendant.

VIDEO-DEPOSITION Sky Roberts
OF:

TAKEN BY: Defendant

REPORTED BY: Karla Layfield, RMR
Stenographic Court Reporter
Notary Public
State of Florida at Large

DATE AND TIME: May 20, 2016; 8:33 a.m.

PLACE: Millhorn Law Firm
11294 North US Highway 301
Oxford, Florida

APPEARANCES: Laura A. Menninger, Esquire
HADDON, MORGAN & FOREMAN, PC
150 East 10th Avenue
Denver, Colorado 80203
Attorney for Defendant

Brad Edwards, Esquire
Farmer, Jaffe, Weissing, Edwards,
FISTOS & LEHRMAN, PL
425 Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Attorney for Plaintiff

ALSO PRESENT: Kenneth Sarcony, Videographer

Owen & Associates Court Reporters
P.O. Box 157, Ocala, Florida
352.624.2258 * owenassocs@aol.com

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(Exhibits attached.)

1 Q Do you remember there being a job posting that
2 you felt like was appropriate for Virginia or did you just
3 go out and talk to the woman who ran the spa area on your
4 own?

5 A I just talked to Angela.

6 Q Okay. Do you recall whether this was intended
7 to be a full-time job?

8 A I don't remember if it was full time or just
9 summer jobs or, you know, during season. It was probably
10 for a season because Mar-a-Lago is seasonal.

11 I mean, I was there year round but a lot of
12 people are seasonal, you know, because it's like
13 snowbirds, you know, summertime comes and nobody wants to
14 be down in south Florida.

15 Q What would you call the season, the seasonal
16 aspect of Mar-a-Lago? What's the season?

17 A Probably from September or October to, you know,
18 maybe May, I guess.

19 Q Is that the coolest time?

20 A Times of the year, yes.

21 Q And it's more guests that come during that
22 period of time?

23 A Yes.

24 Q And is there more staff brought on during that
25 period of time?

1 A Yes.

2 Q You saw that happen every year that you were
3 there?

4 A Every year.

5 Q And in the summer, it's relatively dead because
6 it's so hot?

7 A Basically, it closed during the summer. That's
8 when we would kind of work on everything and then make
9 sure everything is up to snuff for the next year, you
10 know.

11 Q Do you remember what capacity Virginia was hired
12 to work in, what her job title was, for example?

13 A I don't know. I would have lunch with Virginia.
14 That's about as much as I know about what she did. I was
15 busy all the time.

16 Q I understand.

17 A I didn't have time to go see what she was doing.
18 I didn't really talk to Angela about what she had to do.
19 I think that was her name, Angela. But it's kind of the
20 name that sticks out.

21 Q We'll just use Angela.

22 A We'll use that as the name.

23 Q But we know it may not be Angela.

24 A It may not be.

25 Q Just because we have to call her something,

1 A Where did I learn that?

2 Q Uh-huh.

3 A I think Virginia had told me that there was a
4 lady in the spa area named Ms. Maxwell. I don't know her.
5 I couldn't tell you what she looked like.

6 But just she said Ms. Maxwell said she can get
7 me a job with Jeffrey Epstein who is a friend of Donald
8 Trump, so I figured, well, he was a good guy or whatever,
9 you know, and that she was going to learn massage therapy.

10 Q When did Virginia tell you this?

11 A Oh, I can't tell you what date and time but I
12 don't remember.

13 Q I understand.

14 Did she tell you this while she was working at
15 Mar-a-Lago?

16 A Yes. I mean, after she had been there for a
17 little bit, you know, and then she told me, yes, that she
18 could possibly get this other job.

19 Q Okay.

20 A You know.

21 Q So she worked at Mar-a-Lago for a few months?

22 MR. EDWARDS: Form.

23 THE WITNESS: I have no idea. I don't know
24 how long she worked there. I don't remember.

25 BY MS. MENNINGER:

1 A Uh-huh. Yes. It's not to me. It's up to her.
2 I think that's the way I told her, you know.

3 Q Did you ever meet Jeffrey Epstein?

4 A Once.

5 Q When was that?

6 A I dropped Virginia off at the house once and he
7 came out and I met him and seemed just fine to me. I
8 mean, you can't tell people by looking at them.

9 I mean, I know now from, you know, what I've
10 read that he's not a good guy. But you can't tell. You
11 know, you don't even know your neighbors sometimes, you
12 know.

13 Q Do you remember about when you dropped Virginia
14 off at his house that you met him?

15 A What do you mean?

16 Q Was it about the same time Virginia started
17 working with him?

18 A Yeah.

19 Q Was it later?

20 A I think it was about the time she started.
21 Because I wanted to see where she was at, you know. And
22 it was just a mansion down the street from, you know,
23 Mar-a-Lago. So I didn't think twice about it. I didn't
24 think nothing of it. He came out. He was very cordial,
25 very nice.

1 Q Do you remember any part of your conversation
2 with him?

3 A No. It was just that, you know how a parent has
4 to meet -- you know, if my daughter is going to work
5 somewhere, I just want to meet the guy and see what was
6 going on, you know. But I don't remember any
7 conversation, you know.

8 I just remember meeting him and that was it and
9 she walked into the house and --

10 Q All right. So you recall Mr. Epstein coming
11 outside of his home and greeting you?

12 A Yes.

13 Q Were you invited into his home?

14 A No.

15 Q Did you ever go inside of his home?

16 A No.

17 Q Other than that one time you dropped her off
18 there, do you ever remember going to that home?

19 A No. I couldn't tell you where it was at.

20 Q Okay. Did you meet anyone else while you were
21 there at the home?

22 A No.

23 Q Did you have a conversation with anyone else?

24 A No.

25 Q Did you every call Virginia at that home?

1 massage therapy.

2 Q All right. When she came home at night from
3 working with Mr. Epstein, did she look distressed to you
4 in any way?

5 A Not that I remember.

6 Q Okay. Did she report any complaints about her
7 job with Mr. Epstein?

8 A Not to me.

9 Q Okay. Did she report them to anyone else who
10 then reported them to you?

11 A No.

12 Q Your wife, for example?

13 A I have no idea. Like I said, if she did tell my
14 wife, I never heard about it.

15 Q Okay. Have you ever met Ms. Maxwell?

16 A Not that I remember ever meeting her.

17 Q Do you know what she looks like?

18 A No.

19 Q Did you ever meet anyone else who worked with
20 Mr. Epstein?

21 A No.

22 Q Do you remember anyone else who worked for
23 Mr. Epstein bringing your daughter home, for example?

24 A No.

25 Q Did your daughter ever move into the home where

C E R T I F I C A T E

STATE OF FLORIDA

COUNTY OF MARION

I, Karla Layfield, RMR, Stenographic Court Reporter, do hereby certify that I was authorized to and did stenographically report the foregoing deposition of Sky Roberts; that said witness was duly sworn to testify truthfully; and that the foregoing pages, numbered 1 through 142, inclusive, constitute a true and correct record of the testimony given by said witness to the best of my ability.

I FURTHER CERTIFY that I am not a relative or employee or attorney or counsel of any of the parties hereto, nor a relative or employee of such attorney or counsel, nor am I financially interested in the action.

WITNESS MY HAND this day of May, 2016, at
Ocala, Marion County, Florida.

Karla Layfield, RMR
Stenographic Court Reporter

1 CERTIFICATE OF OATH

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, the undersigned authority, certify that Sky
5 Roberts personally appeared before me and was duly sworn
6 on the 20th day of May 2016.

7 WITNESS MY HAND AND OFFICIAL SEAL this day
8 of May 2016.

9
10
11 Karla Layfield, RMR
12 Notary Public
13 State of Florida at Large
14 My Commission No. FF942806
15 My Commission Expires 12/10/2019

16 Personally Known
17 Professionally Known
18 Produced Identification of FDL
19
20
21
22
23
24
25

EXHIBIT U

**THE MAR-A-LAGO CLUB, L.C.
EMPLOYMENT POLICIES
OCTOBER 28, 1995**

exh
EXHIBIT **19**
Giuffre
AGREN BLANDO REPORTING
11-14-16

MAR-A-LAGO 0178

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INTRODUCTION

The Mar-A-Lago Club, L.C. ("the Club") seeks to provide the quality of work which will develop the potential of each employee as well as the Club as a whole. In this regard, this policy and procedures manual is designed to acquaint each employee with the administrative and personnel practices of the Club. These guidelines provide a framework for the fair and equitable treatment of all employees regardless of location, department, manager or supervisor. Each employee should be familiar with the responsibilities and opportunities available to make work as rewarding as possible.

These policies and procedures should be read carefully and clearly understood. Each department head, manager or supervisor will be able to answer, or obtain an answer, to any questions involving interpretation or clarification of these policies and procedures. Each employee is expected to apply these general policy and procedure guidelines conscientiously in a constructive and supportive manner.

The policies in this manual are only guidelines and the Club reserves the right to add to, subtract from, or change these provisions in any way, at any time, without being bound to the previously replaced or revised provisions. This handbook is not to be construed as an employment agreement or employment contract and the Club is under no obligation to provide the benefits set forth in this manual if it determines, at a subsequent time, that these benefits are to terminate.

EQUAL EMPLOYMENT OPPORTUNITY

The Club is an equal opportunity employer which is committed to prohibiting discrimination on the basis of race, color, sex, age, religion, national origin, sexual orientation, marital status, or disability throughout the employment process, from selection through termination.

The Club intends to provide a pleasant work environment that is healthful and comfortable and will not tolerate any form of employee harassment, either verbal, written, physical, or visual, based on race, color, religion, sex, national origin, age, disability or marital status.

Harassment can take many forms. It may be, but is not limited to: words, signs, jokes, pranks, intimidation, physical contact, violence toward any employee by a fellow employee, a supervisor, or a person doing business with the Club. Harassment is not necessarily sexual in nature.

All necessary steps will be taken to comply with existing federal, state and local fair employment laws and guidelines.

ORIENTATION POLICY

The first ninety days of employment are considered to be an orientation or probationary period during which you and the Club have an opportunity to know each other. Your performance will be evaluated during this time to assess your potential for continued employment. Evaluations will continue as long as you are employed, but during the orientation period your supervisor may observe and evaluate your performance more closely and more frequently to ensure that you are learning your job. During this orientation period, employees may earn but may not use vacation or personal days, except with permission of the Club Manager's office. If the employment relationship is terminated during this ninety day period, you shall not be entitled to receive any payment for benefits, e.g., personal days, vacation days, or unemployment compensation.

SEXUAL HARASSMENT

The Club strictly prohibits any form of harassment in the workplace, including sexual harassment.

Definition of Sexual Harassment:

1. Unwelcome sexual advances, requests for sexual favors, and other such verbal or physical conduct constitute sexual harassment under the following conditions:
 - A. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
 - B. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual.
 - C. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.
2. Conduct which falls into the definition of sexual harassment may include, but is not limited to:
 - A. Unwelcome physical contact of a sexual nature such as patting, pinching or unnecessary touching.
 - B. Overt or implied threats against an individual to induce him or her to perform sexual favors or to engage in an unwelcome sexual relationship.
 - C. Verbal harassment or abuse of a sexual nature, including intimating by way of suggestion a desire for sexual relations or making jokes or remarks of a sexual nature to or in front of a person who finds them offensive.
 - D. Use of sexually suggestive terms or gestures to describe a person's body, clothing, or sexual activities.
 - E. Displaying or posting offensive sexually suggestive pictures or materials in the workplace.

Recourse:

3. If an employee feels that an incident of any form of harassment has occurred, the employee is encouraged to report the matter to the Club Manager's office. All such issues will be handled in strict confidence to the extent possible with minimum embarrassment to the involved parties. As in any grievance procedure, the facts of the situation will be reviewed objectively so that appropriate disciplinary action, including discharge, can be taken if misconduct has occurred.

A timely resolution of each complaint is to be reached and communicated to the parties involved. Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited.

In the event an employee files a frivolous, malicious or false claim, appropriate sanctions for discipline of the complainant, including termination, may result.

CARE OF FACILITIES

The Club has made a large investment in equipment and facilities to provide each employee with the necessary resources to accomplish his/her duties.

It is the responsibility of management and each employee to treat equipment and facilities with respect and care. Neatness and cleanliness are required to maintain these resources at a level at which the employee can and will be proud. Abuse of equipment and facilities will not be tolerated and may lead to disciplinary action including discharge.

ENTRY AND EXIT OF CLUB GROUNDS/PREMISES

All employees must enter and leave the Club at the Southern Boulevard gates unless otherwise directed by management.

Employees may not enter the Club grounds/premises more than 30 minutes before the start of their scheduled shift, and employees must exit the Club grounds/premises directly after their shift ends, unless authorized by your department head.

When conducting Club business off the premises of Mar-a-Lago, you must have approval of your department head or supervisor.

Employees may not patronize the Club facilities without prior written approval of their department head.

If an employee needs to return to the property for any reason, the employee must contact their supervisor or a department head prior to their arrival. Security must be contacted in the event no supervisor is available.

PROOF OF AUTHORIZATION TO WORK

You must comply with government regulations by furnishing valid documentation of both your identity and your authorization to work. The Club Manager will advise you what documents are acceptable. If your immigration or work authorization status changes after you begin work so that you are no longer able to continue to work in the United States, you must advise your supervisor and the Human Resources Manager.

SECURITY

A. INFORMATION -

All financial, contract, production, and administrative records and information of the Club and its members are confidential. Each employee is responsible for making certain that information under his/her control is appropriately safeguarded. An employee will not provide or disclose office or guest information to third parties unless it has been determined that the party has a legitimate right to know and the request has been approved by your Supervisor.

Authorization by the Managing Director must be obtained before written contact is made of any member, client, purveyor, (current or prospective).

Any uncertainties should be cleared with the Managing Director before such information is provided.

B. CONFIDENTIALITY -

No employee shall, during the term of his/her employment or thereafter disclose to others or use, except as authorized by the Managing Director, any of the Club's confidential, technical, or other business information. "Confidential, technical or other business information" shall mean any information, including lists of the Club's vendors and customers, which the employee has used, learned or contributed during the course of his/her employment, regardless of whether it was written or in other tangible form that (i) is not generally available to the public; or (ii) gives one who uses it a competitive advantage over the Club.

C. FACILITIES -

Access to Club facilities will be limited to parties with a legitimate reason to be there. Employees are not permitted to have visitors on the premises unless special arrangements have been made by the employee's supervisor. Outside visitors will be greeted by Post One and escorted to their area of business. Each employee should feel comfortable in politely confronting an unknown individual who appears suspicious or in need of direction.

An essential element of the security procedures of the Mar-a-Lago Club is the key control process. As such, employees who have access to Club keys must recognize the importance of properly safeguarding the keys which have been entrusted to them. All employees should be aware that they may be subject to disciplinary action for any violation of the key control procedures. Guest room keys must never be left in your locker.

In the event of a breach or threatened breach by the employee of provisions A, B or C of this section, the Club shall be entitled to an injunction restraining the employee from disclosing or using, in whole or in part, such information or from rendering any services to any person, Club, corporation, association, or other entity to whom such information, in whole or in part, has been disclosed or is threatened to be disclosed. Nothing herein shall be construed as prohibiting the Club from pursuing other remedies available to the Club for such breach or threatened breach, including the recovery of damages from the Club.

D. GUEST PRIVACY -

Everyone enjoys privacy. Employees are prohibited from revealing any personal or business information about a Club member.

Do not divulge names or room numbers of one guest to another. Do not let a person into any guest room without verifying with the front desk that the person is the guest registered to that room.

All guest floors and areas are off limits to employees unless they are specifically assigned to perform work duties in these areas.

Employees are not allowed to accept invitations from guests to join them in their room. At no time is an employee to ask a member for an autograph or to ask a member to socialize with them off duty.

E. UNAUTHORIZED AREAS -

Employees may not enter areas of the building, especially guest floors, unless they have been assigned by a supervisor. Example:

Building Employees require work orders on guest floors.

Food Service Employees require valid room service checks or authorized pick-up request before going on the guest floors.

F. REPORTING CRIME -

The Security Department, with its able staff, attempts to control crime and provide a safe operation. Due to the enormity of the Club, they cannot be everywhere at once, and your help is needed. Follow these simple security measures:

- 1) Notify Security (ext. 212) of any suspicious person.
- 2) If you are a witness to a crime, relate to the dispatcher as much specific detail as possible, including a description of the individual and the nature of the crime.

G. MEDIA -

Because of the celebrated and historic nature of Mar-a-Lago and its significance to Palm Beach, Florida and the United States, we are contacted daily by the media (television, radio, newspapers, magazines, wire services). They want to know what is happening at the Club and they want comments for their articles or newcasts. It is important that no Club employee other than the Managing Director, Special Events Manager or Director of Membership comment to the press on the Club or it's members.

GUEST NAMES

All guests are to be treated in a friendly, courteous, professional manner. Systems or procedures are used within each department to inform employees of our guests' names. We want you to use the guests' name at all times if possible. Be friendly to guests and call them by name; however, do not be too familiar with a guest by using his/her first name.

SAFETY AND HEALTH

The Club's goal is to provide a safe and healthy environment for employees. Each employee is expected to comply with all safety and health requirements whether it is established by management or by federal, state or local law.

The Club does not expect any employee to take unnecessary risks. Study the job assigned to you and learn the safety rules of your department. In everything you do, make sure that you have observed every reasonable safety precaution.

Most Club accidents are simple and common, such as slips and falls, cuts, burns, sprains and strains. They are easy to prevent. Observation of the following general rules will prevent many employee accidents:

1. Report all injuries at once to your supervisor.
2. If you are not sure how to do a job safely, ask your department head.
3. Horseplay and practical jokes are prohibited.
4. Put equipment away after use. Don't block passages.
5. Broken chairs, loose and worn carpeting, missing lights and other equipment needing maintenance may cause accidents. Report these along with any other safety hazard at once to your department head.
6. Wear the right clothing for the job.
7. Show other employees the safe way to do the job.
8. If the load seems too heavy to lift safely, get help. When lifting any load, follow the safe lifting practice listed below:
 - a. Be sure you can handle it alone. If not get help.
 - b. Face the load squarely.
 - c. Secure a firm footing with your feet properly spread.
 - d. Bend your knees.
 - e. Get a grip on the load.
 - f. Keep a straight back and lift by straightening your legs gradually not suddenly.

- g. Keep the load close to your body.
- h. Don't twist your body.
- 9. Do not carry a load so that it will block your vision. Make sure you can see where you are going.
- 10. Avoid slippery, wet or greasy floors. Clean up wet or greasy spots as they occur.
- 11. Use a ladder to reach things that are up high. See that the ladder is firmly placed. While on the ladder, don't reach too high or too far to one side.
- 12. Place broken glasses, dishes, etc., in special receptacles designated for this purpose.
- 13. Do not operate equipment unless properly trained and specifically instructed to do so by your supervisor.

All accidents occurring on the Club's premises or to Club employees, regardless of whether they result in an injury, must be reported immediately to your supervisor. The Club is required to report all work-related injuries as soon as possible. If you are too seriously injured to describe the facts surrounding the accident, it is the responsibility of the supervisor to supply the information to the Human Resources Manager.

If a member has an accident, you should see that he or she is comfortable and then immediately notify your supervisor, department head, Managing Director and the Security Department. Any property damage due to accidents should be reported in the same manner.

WORKERS' COMPENSATION

We all do the best job we can to prevent accidents and injuries at home and at work. If you spot a safety hazard on the job, report it to your supervisor immediately. Workers' Compensation is provided by the company to pay an employee partial compensation if he or she loses time due to a work-related accident.

In case you are injured:

- 1. Report the injury immediately to your supervisor.
- 2. Following first-aid or medical treatment, your supervisor will contact security to file an incident report and then notify the Human Resources Manager.

3. The Human Resources Manager completes the Workers' Compensation Report and submits copies to the insurance carrier. When you lose work time because of an injury on the job, a medical certificate from your doctor or the Health Center must be submitted to the Human Resources Manager with a return to work date prior to return to work.

Remember to **report all injuries immediately**, no matter how small they may be, to your supervisor. Though the injury may seem small at first, it may become serious later, and result in lost work time.

EMERGENCY PROCEDURES:

Adhere to the following procedures in emergency situations:

A. FIRE -- In case of fire or smoke: STAY CALM

1. Pull fire alarm
2. Dial Security at Extension 212 and give location of fire, (closest room number, floor, type of fire or smoke), remain on the phone to give additional information as required.
3. When the fire department or Club fire brigade arrives, direct them to the location. Remember, most persons die from smoke and poisonous gases. Stay low to the ground if there is any smoke at all. If you encounter smoke or fire at lower levels, turn around and walk up to clearer air, or use another exit.
4. Be certain to follow instructions of the fire department and the Club fire brigade in order to ensure the safety of all guests and employees.

B. BOMB SCARE OR WARNING

You all know your own work areas, and are usually aware of any unfamiliar items. A bomb may be concealed in a length of pipe, small parcel, suitcase or paper bag. When a suspicious item is discovered DO NOT TOUCH and report immediately to:

1. Club operator - dial 300
2. Security - dial 212

C. GUEST ILLNESS

- Follow the same procedures as listed above.

The most important thing to remember in an emergency is

DO NOT PANIC!

USE OF CLUB'S COMPUTER SYSTEM AND SOFTWARE PROGRAMS:

A. GENERAL

The Club has invested a large sum of money in its computer system and software programs. The information in the computer system represents much work by many employees and is an important component of the Club. In order to protect this valuable

information, no employee is allowed to bring to work any computer games, hardware, programs or software which is not licensed and registered under the Club name, or install or otherwise use any such items unless they have been approved in advance, in writing, by the Managing Director. The reason for this is simple. Outside programs may contain viruses which can disrupt or destroy our computer system. Even if you are sure that the program you bring does not contain a virus, and that it would not damage our computer system, you are not to use any outside program without written advance approval. If software programs are not properly registered, there may be criminal and civil penalties for their use.

In addition, the Club has noted that some computer programs also contain games or programs which are not related to the work of the Club. These programs are not to be played by any employee at any time during the work day. Only computer programs that are directly related to the work of the Club are to be used on Club computers.

No employee is authorized to download or remove any information from the Club's computer system without the expressed advance permission of the appropriate supervisor. (See the Club's policy on security.)

B. ELECTRONIC MAIL

During your workday, the electronic mail and other information systems are not to be used in a way that may be disruptive, offensive to others, or harmful to morale.

Specifically, it is against Club policy to transmit E-mail communications that contain ethnic slurs, racial epithets, or anything that may be construed as harassment or offensive to others based on their race, national origin, sex, sexual orientation, age, disability, religious or political beliefs, is strictly prohibited and may constitute grounds for termination.

Employees should use the information systems for Club business only. The E-mail system also should not be used to solicit others for commercial ventures, religious or political causes, outside organizations, or other personal matters unrelated to your job.

For privacy reasons, employees should not attempt to gain access to another employee's personal file of E-Mail messages without the latter's express permission. Further, employees shall not use a code, access a file or retrieve any stored communication, other than where authorized, unless there has been prior clearance by an authorized Club representative.

Management reserves the right to enter an employee's E-mail files on an "as needed" basis by authorized personnel to ensure the Club's legitimate business interest in the proper use of its property. System security features such as passwords and message

delete functions do not neutralize the employer's ability to access any message at any time. Employees who use E-mail for private, non-job-related purposes do so at their own risk. By using the Club's equipment and E-mail systems, employees consent to have such E-mail use, messages and files monitored by authorized firm personnel.

C. VOICE MAIL

The Club utilizes a voice mail system which allows employees, clients, etc. to leave voice messages. The Club reserves the right to monitor and review all messages left on the voice mail system at any time. All voice messages should be confined to business or work-related matters.

D. RIGHT TO INSPECT

No employee is to have an expectation of privacy with regard to any voice mail messages, E-mail or computer files, and the Club has the right to monitor and review these electronic and computer systems at any time.

DISCLOSURE OF EMPLOYEE INFORMATION

REFERENCE CHECKS

All inquiries regarding a current or former employee of The Mar-a-Lago Club must be referred to the Human Resources Manager.

Should an employee receive a written request for a reference, he/she should refer the request to the Human Resources Manager for handling. No Mar-a-Lago Club employee may issue a reference letter to any current or former employee without the permission of the Human Resources Manager or Managing Director.

Under no circumstances should any Mar-a-Lago Club employee release any information about any current or former Mar-a-Lago Club employee over the telephone. All telephone inquiries regarding any current or former employee must be referred to the Human Resources Manager.

In response to an outside request for information regarding a current or former Mar-a-Lago Club employee, the Human Resources Manager will furnish or verify only an employee's name, dates of employment, job title and department. No other data or information regarding any current or former Club employee, or his/her employment with Mar-a-Lago will be released unless the employee authorizes the Club to release such information in writing or Mar-a-Lago is required by law to furnish any information.

NO SOLICITATION/NO DISTRIBUTION

Persons who are not employees of the Club are prohibited from soliciting our employees, distributing literature, or selling merchandise to our employees, on our premises at any time. The purpose of this rule is to prevent employees and customers from being disrupted or imposed upon by such activities and to maintain our operations at peak efficiency at all times.

For similar reasons, solicitation and distribution of literature are prohibited during the working time of either the employee making the solicitation or distribution, or the targeted employee. The term "working time" does not include an employee's authorized lunch or rest periods, or other time when the employee is not required to be working.

Distribution of literature is prohibited in work and customer areas at all times. The distribution of literature in such a manner as to cause litter on the Club's property is prohibited. Off-duty employees are not allowed to return to the interior or working areas of the Club's premises until the next scheduled work time.

The Club maintains bulletin boards to communicate Club information to employees and to post notices required by law. These bulletin boards are for the posting of Club information and notices only, and only persons designated by the Managing Director may place notices on or take down material from the bulletin boards. The unauthorized posting of notices, photographs or other printed or written materials on bulletin boards or any other Club property is prohibited.

INSPECTIONS

The Club respects its employees' right to privacy. However, for security purposes, we maintain the right to inspect certain personal belongings.

Each employee agrees, as a condition of continued employment, to allow management to inspect employee personal property on our premises. Any package brought into or taken out of our premises may be inspected. Our premises and equipment, including Club vehicles, lockers and desks, are subject to inspection at any time.

Refusal to cooperate in an inspection or search will be considered a violation of your terms of hire and insubordination.

INTERNAL INVESTIGATIONS

From time to time The Mar-a-Lago Club may be required to conduct internal investigations pertaining to security, auditing or work-related matters. Employees are required to cooperate fully with and assist in these investigations if requested to do so.

Whenever necessary, in Management's discretion, employees' work areas (i.e., desks, file cabinets, etc.) and personal belongings (i.e., brief cases, handbags, etc.) may be subject to a search. Employees are required to cooperate.

Management will generally try to obtain an employee's consent before conducting a search of work areas or personal belongings, but may not always be able to do so.

OUTSIDE EMPLOYMENT

The Club does not object to your holding other jobs, provided that there is no conflict of interest and your job at the Club comes first. However, outside employment which interferes with your obligations to the Club is prohibited. In addition, no employee shall claim to be a Club representative in connection with any outside employment.

Before accepting any supplementary job, it is mandatory that you notify your Supervisor and the Department Head to determine if there is a conflict of interest or if it would adversely affect your job performance at the Club. If the Club determines that a conflict of interest exists or acceptance would adversely affect your job performance, you shall not engage in outside employment. Failure to notify the Supervisor and the Department Head in advance of any outside employment will be grounds for immediate termination.

Please note that if at any time your job at the Club suffers due to additional employment elsewhere, the Club reserves the right to ask you to give it up. Failure to comply with such a request will also be grounds for immediate termination.

PROPERTY OF EMPLOYER

Employees may not remove from the Club premises any Club property not belonging to the employee. Any other property that an employee removes from Club premises, must be accompanied by a Club Package Pass, signed by a department head or his/her designated supervisor.

Upon termination of your employment, you must surrender to the Club any and all material including, but not limited to, drawings, manuals, reports, documents, lists of the Club's vendors and customers, and the like (including all copies thereof), that you have in your possession relating to the business of the Club, or its affiliates. You recognize that all such materials are the property of the Club solely and that you have no right, title, or other interests in or to such materials.

EMPLOYEE APPRAISAL

It is the objective of the Club to provide an atmosphere in which each employee can receive periodic, thorough appraisals of their performance and compensation. The Club uses the performance evaluation as a means to achieve these objectives. Each Manager, Supervisor and employee should be familiar with their role in contributing to the success of the appraisal system.

TELEPHONE COURTESY PROCEDURES

Telephone Calls - Personal calls are prohibited, except in an emergency, since it interferes with the flow of business. Telephone courtesy is an essential part of every employee's interaction with guests. All incoming calls should be answered according to the following mandatory procedures:

1. All calls are to be answered within three rings

2. Answering a Department line:
 - a. standard greeting (i.e., Good Morning/Afternoon/Evening).
 - b. Give the name of the department.
 - c. Give your name.
 - d. Offer assistance: "Good morning, Reception Desk. This is John. How may I help you?"
3. Answering another individual's line:
 - a. Standard greeting.
 - b. Identify whose office or department.
 - c. Give your name.
 - d. Offer assistance or to take a message: "Good afternoon, Mr. Smith's office. This is Mary. How may I help you?"
4. When placing a call on "hold:"
 - a. Use the word "wait," not "hold."
 - b. Always ask permission and wait for guest's response: "Are you able to wait?"
5. Returning to a call placed on "hold":
 - a. Always thank the guest for waiting or apologize for the wait.
 - b. Give your name.
 - c. Offer assistance: "Thank you for waiting, this is Mary. How may I help you?"
6. When transferring a call:
 - a. Always announce the transfer of a call to the party receiving the call: "Mr. Smith, I am transferring Bob Jones to you."
 - b. The caller should then be connected and an announcement of the connection made: "I have Mr. Smith on the line now. Go ahead, please."
7. When ending a conversation:
 - a. Always say "thank you" or "you're welcome."
 - b. Use the guest's name if possible.
 - c. Let the caller know you are happy to be of service or sorry you are unable to help.
 - d. End the conversation with "good-bye" and hand up the receiver gently: "Thank you for calling, Mr. Smith. We're glad we could help. Good-bye."

EMPLOYEE ATTENDANCE AND TARDINESS

Your schedule is developed after considering the Club's needs and flow of business. Your adherence to the schedule and flexibility concerning any necessary changes will help ensure our Club's success.

Each employee is required to work the hours normally scheduled for his or her assigned position.

Employee's work schedules will be those hours authorized by their Supervisor to meet operational requirements.

If you are unable to report to work for any reason, you must notify your supervisor no later than Three (3) hours prior to your scheduled reporting time, stating your reason for lateness or absence, and when you expect to arrive at work. Check with your supervisor to see if additional notice time is required.

In the event your supervisor is not available, you are to contact SECURITY Ext.212 or the Human Resources Manager. You must call in each day of your absence. Upon the third consecutive day of absence, a Health Care Provider's note will be required of the employee before returning to work. An employee who is absent for three consecutive days without proper notice to the Club may be considered to have voluntarily resigned his or her position with the Club.

Failure to adhere to employee attendance policies results in time consuming arrangements and costly replacements and may lead to disciplinary action.

Tardiness places an unfair burden upon your supervisors and co-workers. All efforts should be made to be at work according to schedule. Your supervisor is to be contacted if it is unavoidable for you to be late to work. Continued tardiness will result in disciplinary action, up to and including termination.

LINEN ABUSE

Linen abuse is considered to be any type of mishandling or misuse of linen, causing damage to the point that the linen would be unfit to place before a guest.

The following are the most common abuse occurrences.

1. Using linen as rags for cleaning.
2. Leaving linen lying on the floor.
3. Cleaning ashtrays with linen.
4. Using napkins as food covers.
5. Carrying linen on your person to be used as sweatbands, handkerchiefs, etc.
6. Throwing rags or linen in the trash.
7. Mixing rags with linen.

Violation of these linen abuse standards may lead to disciplinary action. The replacement of lost or damaged linen is a costly process, and we need everyone's help in curtailing this enormous expense.

TIME REPORTING - SIGNING IN AND OUT

You must check in first at the guard post at the employee's entrance on Southern Boulevard, and then again upon your arrival at Post One. At the end of your shift you must check out at Post One and also at the guard post at the employees' exit on Southern Boulevard.

When reporting in and out of work employees will be solely responsible for keeping their own hours worked by logging in and out at the timekeeping terminal. Pay is calculated for the actual hours worked by the actual entry of this information. Any deviations in the schedule including overtime can be done with the supervisors approval only. These deviations are indicated in writing at the end of the work week for presentation to payroll.

Under no condition shall an employee enter for time other than his/her own. An employee who leaves the Club during his/her work schedule must first obtain their supervisor's permission. Failure to adhere to these procedures, will result in disciplinary action, up to and including termination of employment.

NOTE:All Wait Staff employees must also sign in on the "DAILY SIGN IN SHEET" which will be located with your Captain.

CHANGE OF ADDRESS OR STATUS - PERSONNEL RECORDS

To keep necessary Club records up-to-date, it is extremely important that you notify the Human Resources Department of any changes in:

1. Name and/or marital status.
2. Address and/or telephone number.
3. # of eligible dependents.
4. W4 Deductions.

INITIAL EMPLOYMENT PERIOD

Every new employee goes through an initial period of adjustment in order to learn about the Club and about his/her job. During this time, the employee will have an opportunity to find out if he/she is suited to, and likes, his/her new position.

Additionally, the initial employment period gives the employee's supervisor a reasonable period of time to evaluate his/her performance. The initial employment period is 3 months.

During this time, the new employee will be provided with training and guidance from his/her Supervisor. He/she may be discharged at any time during this period if his/her Supervisor concludes that he/she is not progressing or performing satisfactorily. Additionally, under appropriate circumstances, the initial employment may be extended.

At the end of the initial employment period, the employee and his/her supervisor may discuss his/her performance. Provided his/her job performance is "satisfactory" at the end of the initial employment period, he/she will continue in our employment.

EMPLOYEE CATEGORIES

- * Full Time - Year Round Employee
- * Seasonal Employee

WORK HOURS, SALARY AND OVERTIME PREMIUMS

A. WORK HOURS

The Club never shuts down from November 1 to Mother's Day; for 24 hours a day, 7 days a week, it serves the diverse needs of our members. Therefore to ensure adequate coverage at all times, departments have arranged different schedules for their employees.

B. SALARY

The Club's policy regarding personnel is to offer competitive starting wages and to maintain a fair and equitable wage structure. Wage increases are given when appropriate based upon results of performance evaluations and/or employment status change.

The work week at the Club begins on Monday and ends on Sunday. Scheduled paydays are as follows: Friday pay vouchers indicating deposit into your existing Great Western banking account will be issued.

If there is a discrepancy in your paycheck, advise your department head immediately. Do not call or go to the payroll department. If your department head is not available, contact the Human Resources Manager and assistance will be provided.

The Club is unable to make advances on employee paychecks.

C. OVERTIME PREMIUMS

1. Hourly and Salaried Employee (non-exempt)

Hourly or salaried employees are eligible for overtime premium at one and one-half (1.5) times their base hourly rate under the following conditions:

Overtime work has been specifically authorized by the direct Supervisor in advance or in writing after the fact. More than forty (40) hours are actually worked by that individual in one work week, not including sick time, vacation, holidays and time off for personal business and other non work time.

The work week commences on Monday morning and ends Sunday at midnight.

2. Salaried Employee (exempt)

A salaried exempt employee is not compensated directly for specific overtime hours worked. A salaried employee is paid to accomplish a specific job and his/her salary is based upon the fact that hours in excess of 40 per week may be necessary on occasion.

Overtime is at the request of a supervisor or department

head for emergency client business. The Supervisor must authorize overtime and sign the employee's schedule signifying such authorization.

EMPLOYEE BENEFITS AND PROGRAMS

As a regular full time year round employee you will enjoy an excellent benefits package which is designed to help protect your health, and plan for your future. The Mar-a-Lago Club reserves the right to change any or all of these benefits at any time.

- * Group Health Insurance
- * Group Life Insurance
- * Group Dental Insurance
- * 401K - After one full year of continuous employment

For information relating to the cost of such benefits, eligibility requirements, etc. please contact the Human Resources Manager.

BEREAVEMENT LEAVE

In the event of a death in an employee's immediate family, the Club will allow a maximum of three (3) days off with pay for funeral related leave. Immediate family includes spouse, child, mother, father, brother, sister, grandparent, grandchild, aunt, uncle, daughter-in-law, son-in-law, mother-in-law, father-in-law, step-child, step-parent.

When a death occurs, notify your supervisor at once with all of the details, including the family member who died and where the funeral will take place. The supervisor should notify the Human Resources Manager of the reason and length of the employee's absence.

JURY DUTY

An employee summoned for jury duty will be compensated in the following manner only if he/she notifies his/her supervisor and provides him/her with a copy of the summons.

During the jury leave, the employee will be paid the difference between jury compensation and the employee's regular pay for up to three days. Any day in which you are excused from jury service at a time when there are three (3) or more hours remaining in your daily scheduled shift, you will report for work.

NOTE: If the jury duty falls at a time when the employee cannot be away from work, the court may allow the employee to choose a more convenient time to serve if he/she makes a request in accordance with the court's procedure.

MILITARY LEAVE

An employee who is a member of the United States Army, Navy, Air Force, Marines, Coast Guard, a member of the National Guard, a member of the Reserves or Public Health Service will, where a specified period of active or reserve duty is mandatory, be granted a leave of absence in accordance with applicable law.

Upon receipt of orders for active or reserve duty, the employee should notify his/her supervisor, as well as the Human Resources Manager immediately and he/she must submit a copy of his/her orders to his/her supervisor and the Human Resources Manager.

MATERNITY LEAVE OF ABSENCE

Pregnancy, childbirth, and related medical conditions are temporary disabilities for the purpose of any health or temporary disability insurance or sick leave policy maintained by the Club. An employee who is pregnant, or has medical conditions related to pregnancy will be granted a leave of absence and will be eligible for the same leave benefits as received by employees suffering from illness or other temporary disabilities.

FAMILY MEDICAL AND PERSONAL LEAVE OF ABSENCE

As a result of the Federal Family and Medical Leave Act ("Act"), the Club provides an added benefit to each employee. Each employee will have up to 12 weeks of unpaid family leave during a "rolling" 12-month period month period for: (1) the birth and care of a newborn child; (2) adoption or foster care of a child; (3) to provide care to an employee's spouse, son, daughter or parent (or grandparent under certain circumstances) who has a serious health condition; and (4) the employee's own serious health condition which makes the employee unable to perform his/her job functions. Upon an employee's return from this leave, the Club guarantees that the employee will be placed in the same or equivalent position, absent grievous and substantial business reasons affecting the Club.

This leave may be used during the rolling 12-month period even if the full 12 weeks have not been taken. Intermittent use of this leave or a reduced leave schedule may be allowed only where leave is taken for a sick family member, or for an employee's own serious health condition, when medically necessary. If you are not eligible for the 12 weeks unpaid leave, you may still be eligible to take an unpaid leave of absence for medical reasons or a personal leave of absence at the discretion of the Club.

As a result of the Act, it has been necessary to modify some provisions of our policies on sick days, short term disability and personal leaves of absence to comply with the Act. The information that follows is designed to address the great majority of situations that arise in a regular or routine manner. The federal Family Leave Law, however, is subject to on-going review process and interpretation by the courts, therefore, the statements made here can not possibly address every contingency that may arise in interpreting this new and broad Law. For these reasons, special situations will be reviewed on a case-by-case basis. Set forth below is the Club policy with regard to medical and personal leaves of absence, including provisions of Act.

If you have any questions, please contact the Human Resources Manager who will be glad to answer your questions.

A. 12 Week Family Medical Leave

Purpose:

This policy allows an employee to request a family or regular medical leave of absence (LOA) because the employee has a serious health condition which makes the employee unable to perform the functions of the job position (this policy includes a serious health condition related to pregnancy).

Policy:

All employees with a minimum of 12 months of service (and 1250 or more hours worked during the previous 12 months) at the time the family medical LOA begins, are eligible for up to 12 weeks of unpaid family medical LOA during a rolling 12-month period. Employees are eligible so long as the employee is certified to be unable to work during this LOA period.

See Section D below for details on requesting this LOA.

B. Regular Policy for those Not Eligible for Family Medical LOA (e.g. previously used Family LOA)

All employees who are not eligible for the 12 week family medical LOA at the time the medical LOA begins (e.g., less than 12 months of service, less than 1250 hours worked, or insufficient time has passed since a previous LOA) are eligible for unpaid medical LOA normally not to exceed 10 days.

See Section D below for details on requesting this LOA.

C. Family and Personal LOA

This policy allows an employee to request consideration for a family or personal LOA.

1. Policy (Family LOA):

All employees with a minimum of 12 months of service and 1250 or more hours worked in the previous 12 months at the time the family LOA begins are eligible for up to 12 weeks of unpaid LOA during a rolling 12-month period for:

- * the birth or adoption (or foster care) of a child.
- * providing care to a family member who has a serious health condition (family member is defined as spouse, child, or parent).

Please Note:

A child is one who is under 18 years of age or if 18 years or older must be incapable of self-care because of mental or physical disability.

2. Policy (Personal LOA) Employees who are not eligible for the 12 weeks family LOA at the time the LOA begins (e.g., less than 1 year of service, less than 1250 hours worked, or insufficient time has passed since previous LOA) are eligible for a personal LOA without pay in the Club's sole discretion.

Employees requiring additional time may be required to terminate employment and advise the Club of availability for future rehire. Request for non-family personal LOA may not be approved due to the effect on department operations and/or due to the individual's job performance.

See Section D below for details on requesting this LOA.

D. General Procedures for LOA

1. While on an approved family or other LOA, an employee does not accrue time toward sick leave, vacation days, merit review nor does he/she receive holiday pay.

2. Detailed Procedures:

- (a) A request for any medical LOA must be certified by the employee's health care provider on the claim form supplied by the Human Resources Manager.
- (b) An employee requesting a medical LOA must provide the Human Resources Manager with sufficient medical evidence to support the condition that prevents the employee from performing the assigned job duties. This signed health care provider's statement must include effective date of the LOA, reason for the LOA and approximate date of return. If the medical evidence is deemed to be inconclusive, the Human Resources Manager may arrange for a medical examination (at the Club's expense) to determine the extent of the employee's condition. The Club may require periodic recertification.

The duration of a medical LOA is determined by the period of time the employee has a serious health condition which makes the employee unable to perform the job efficiently and safely.

- (c) Reinstatement may not be guaranteed in management's discretion (employee will be notified prior to beginning the LOA) if the employee is a key salaried employee.
- (d) An employee who returns from a family medical or family LOA on or before the approved LOA has elapsed will be reinstated to his/her previous department and job. Otherwise, every effort will be made to place the returning employee into an equivalent position.

However, for an employee returning from a LOA that has exceeded the allowed maximum calendar days, no

guarantee of reinstatement can be made. In addition, no guarantee of reinstatement can be made for a regular medical or non-family personal LOA. However, if possible, the employee will be re-employed in accordance with the following priorities:

- * In his or her former job if available;
 - * In a comparable job at the same (or higher grade) if available, and if the employee is qualified for that job (at the same salary or higher);
 - * In a lower grade job, if available, and if the employee is qualified for that job. If reemployed, the employee will receive the same salary as he or she received immediately prior to the LOA unless such salary exceeds the maximum salary for the employee's grade upon reemployment, in which case the employee will be paid at that grade maximum; or
 - * If no job is available at the termination of the LOA, the employee will be placed on a preferential hiring list at the Club's sole discretion in a position for which the employee is qualified.
- (e) A request for an LOA is expected to be submitted to the employee's supervisor and the Human Resources Manager at least 30 days prior to the effective date of the LOA (emergencies excepted). This request should include the effective date of the LOA, reason for the LOA and approximate date of return.

For a medical or family LOA, each employee will be required to use earned vacation, personal days and sick pay benefits at the beginning of the LOA. For a personal LOA, only earned vacation will be required to be used.

- (f) For each employee granted a family medical or family LOA, the Club will continue the group health insurance benefit coverage under which the employee was covered as of the last day worked. However, any premiums paid by the employee prior to the LOA must continue to be paid by the employee during the LOA. Payments are due at the same time as they would be made by payroll deduction. If an employee fails to return to work after taking a family or medical LOA, the employee may be potentially liable for payment of health

insurance premiums paid by the employer during the LOA.

- (g) An employee on an LOA must notify the Human Resources Manager of intent to return at least 7 days prior to the desired return date. Medical certification of ability to resume duties must be provided to the Human Resources Manager prior to returning to work. Failure to provide medical certification may result in disciplinary action or termination.
- (h) An employee must contact the Human Resources Manager with a request for an LOA extension at least 14 days in advance of the scheduled return (emergencies excepted). Medical certification is required prior to the beginning of the extension for a medical LOA.
- (i) The Human Resources Manager will notify the appropriate Manager of the date of return of an employee returning from an approved LOA.
- (j) If an employee fails to return to work at the conclusion of an LOA, the LOA will be cancelled and employment will be discontinued as a voluntary termination with the effective date of termination the last day actually worked.
- (k) An employee requiring a medical or personal LOA who has not completed the initial probation period is not eligible for such a LOA and must terminate his/her employment. These employees may be eligible for conversion of group medical insurance. At the Club's option this category of employee may be placed on a preferential hiring list.
- (l) Abuse of an LOA may result in termination of employment.
- (m) In any case in which a husband and wife are entitled to a LOA, the total days of family LOA to which both may be entitled may be limited to 12 weeks during any rolling 12-month period if the family LOA is taken for the birth, adoption (or foster care) of a child.
- (n) In addition, as an alternative to the LOA, the Club and each employee may mutually agree to alternate employment for the employee for the time during which the employee would otherwise be entitled to a LOA under Club policy. Such period of alternate employment will not cause a reduction

in the period of the LOA to which the Club employee is otherwise entitled for their own serious illness.

- (o) The rolling 12-month period in which the 12 weeks of LOA entitlement occurs is a "rolling" 12-month period measured backwards from the date an employee uses a family or medical LOA.

Exception Approval:

Questions concerning this policy should be directed to the Human Resources Manager.

GRIEVANCE PROCEDURE

The Club recognizes that employees may have questions or problems concerning the Club's policies and procedures. In order to encourage employees to voice these concerns and try to solve the questions or problems that may arise, we have a formal problem solving procedure. Please follow these steps:

- Step 1: You should first request to meet with your immediate supervisor (the person you report to directly). The supervisor will listen and investigate the problem with the intention of finding an agreeable solution for those concerned. In order to facilitate a fair and timely solution, you must contact your supervisor within three days

of the occurrence that created the question or problem.

If you feel the problem is with your immediate supervisor, you may skip step 1 and start the grievance procedure with Step 2.

Step 2: Request to meet with your Department Head. Your Department Head will review the problem (including any action taken by your immediate supervisor) and any other relevant facts involved in order to suggest a reasonable solution. In order to facilitate a fair and timely solution, you must contact your Department Head within three days of the occurrence that created the question or problem (if you skipped Step 1) or within two days of your supervisor's resolution (if you followed Step 1).

If you are not satisfied with your Department Head's handling of the problem, you may proceed to Step 3.

Step 3: Request to meet with the Managing Director, or a designated representative, will thoroughly investigate the problem, review Club policies, procedures, rules and regulations and will make a determination. In order to facilitate a fair and timely solution, you must contact the Managing Director within two days of your Department Head's determination.

The Managing Director, or his or her designee, may review the matter and offer a final decision.

Time spent by an employee in discussing a complaint with management during normal working hours will be considered hours worked for pay purposes.

When two or more employees have a common or similar complaint, the employees may select a spokesperson to represent the group. The final decision on the complaint submitted by several employees through a spokesperson will be binding on all members of the group.

If at any time you feel uncomfortable with this process, as it is outlined here, please feel free to contact the Managing Director to assist you before taking further action.

Due to the serious nature of sexual harassment, such complaints should be referred immediately and directly to the Managing Director and Human Resources Manager.

The Club will not tolerate any form of retaliation against employees who have used the Club's problem solving procedure. In the interest of creating a positive and enjoyable work environment, all employees shall be able to use this procedure without fear of retaliation.

However, it is equally important to realize that the problem solving procedure will not prevent the Club from taking disciplinary action, up to and including termination, against any individual under circumstances where the Club deems disciplinary action to be appropriate.

DISCIPLINARY ACTION

A. GENERAL POLICY ADHERENCE

Policies and procedures are necessary guidelines to provide a basis for fair and equitable treatment of each employee. In addition, these guidelines serve as the basis for a fair relationship between the employee and the Club. It is necessary that these guidelines be applied consistently to each employee regardless of location, department or manager. Then, and only then, can the Club establish the confidence that each employee will be treated consistently according to the administrative and operational guidelines. It is the responsibility of each officer, manager, supervisor and employee to contribute fully toward the achievement of this objective.

B. DISCIPLINARY ACTIONS

Violations of any of the established policies and procedures may result in disciplinary action including probation or discharge. The nature of the disciplinary action is contingent upon the facts and circumstances of the individual situation.

The following employee actions are not all inclusive but, by way of illustration only, are some of the events which could result in discipline including discharge. Thus, your department head may establish additional rules and regulations he or she feels are necessary for the orderly fulfillment of your department's responsibilities. These also must be followed. Other actions may also result in discipline including discharge. (It should be noted that the Club and each employee recognize that the employment relationship is for an indefinite period and may be terminated by either party at will.) By providing this list, the Club in no way restricts its legal discretion to terminate employment.

- a. Insubordination, refusal or inability to comply with reasonable instructions of supervisors or department heads. If your supervisor requests you to do something with which you disagree, always follow the instructions at the time and then discuss it later at an appropriate time and location. However, this excludes obedience to demands constituting discrimination, sexual harassment or illegal conduct.
- b. Interference or hindrance with shift schedules. Failure to work on a shift as scheduled or arranging your own shift replacement without the supervisor's permission.
- c. Unauthorized use of Club telephone or property and/or guest facilities.
- d. Entering the Club more than 30 minutes before your shift begins or leaving the Club more than 30 minutes after the end of your shift without the permission of your department head or supervisor. Entering or

- presence in areas within the Club premises without authorization or just cause.
- e. Presence on Club premises at anytime other than your assigned work shift unless specifically authorized by your department head in advance.
 - f. An essential element of the security procedures of the Mar-a-Lago Club is the key control process. As such, employees who have access to Club keys must recognize the importance of properly safeguarding the keys which have been entrusted to them. All employees should be aware that they may be subject to disciplinary action for any violation of the key control procedures. Guest room keys must never be left in your locker.
 - g. Theft (unauthorized removal) or misappropriation (unauthorized storage, transfer, utilization or possession) of Club services (i.e., unauthorized telephone calls, laundry/valet, food and beverage), or guest, employer or Club property, including items found on the Club premises. All articles found on Club premises must be turned into the Lost and Found area at Security in the Timekeeper's area.
 - h. Altering or falsifying a guest check or credit voucher or forging tips through guest checks.
 - i. Refusal to comply with Club rules, policies or procedures.
 - j. Poor job performance, including unsatisfactory attitude that detracts from job performance or the efficient operation of the Club.
 - k. Violation of sexual harassment policy.
 - l. Failure to report for duty without a bona fide excuse and proper notification to your supervisor.
 - m. Failure to comply with established safety and health rules and safe work procedures or engaging in any conduct that creates a safety hazard.
 - n. Failure to meet performance standards.
 - o. Failure to follow grooming and appearance standards.
 - p. Failure to report a workplace accident immediately. If you are injured on the job, you must immediately report this to your supervisor or Human Resources Manager.
 - q. Falsely stating claims of injury.
 - r. Disorderly conduct on the Club premises, including fighting, horseplay or other action that endangers others or Club property.
 - s. Offensive or disruptive behavior, including threatening employees, using abusive or vulgar language, interfering with others in the performance of their duties, or acting in an immoral or indecent manner on Club property, or while off the Club premises in performance of Club duties.
 - t. Destruction, misuse, or removal of Club property, a guest's property or another employee's property.
 - u. Unauthorized disclosure, discussion, removal or use of Club confidential, information, trade secrets or other

- proprietary information (including information contained in personnel records).
- v. Deliberate omission or falsification of information on employment application, time sheets, production or other Club records.
 - w. Unauthorized distribution of literature, posting of notices or signs on Club, premises, fundraising, selling lottery tickets or merchandise, or soliciting donations or any other type of money raising on Club premises, unless specifically authorized by the Managing Director.
 - x. Refusal to allow security checks and package inspections.
 - y. Reading books, magazines, or newspapers while on duty, except where required in the line of duty.
 - z. Loitering, loafing or sleeping on duty.
 - aa. Neglect of duty causing defective work.
 - bb. Smoking anywhere on club property including 124 Woodbridge Rd. and 1094 Woodbridge Rd.
 - cc. Reporting for duty under the influence of intoxicating liquor, marijuana and/or illegal drugs.
 - dd. Bringing, consuming, possessing, providing, selling, or otherwise using intoxicating liquors, marijuana and/or illegal drugs on Club premises.
 - ee. Dishonesty, including but not limited to intentionally not providing full and truthful information when requested by management.
 - ff. Gambling on Club premises.
 - gg. Bringing, discharging, and/or possessing unauthorized firearms or other weapons on Club property or while off Club Property in the performance of Club duties.
 - hh. Giving or taking a bribe of any nature.
 - ii. Being arrested and/or convicted of any crime which the Club believes is detrimental to the Club and/or its other employees.
 - jj. Theft, attempted theft, removal or unauthorized possession of the Club's property or property of other employees or customers.
 - kk. Misappropriation of Club funds or failure to handle funds in accordance with Club guidelines.
 - ll. Irregular attendance including excessive absenteeism, tardiness and/or unexcused absences.
 - mm. Leaving work station or work without authorization or being in an unauthorized work area during your scheduled work period or on your days off, without your supervisor's specific authorization.
 - nn. Interfering with or hindering of work schedules; failing to work on a scheduled shift; or arranging your own replacement on a shift without permission from a supervisor.
 - oo. Failure to report to work after the expiration of a leave-of-absence or layoff.
 - pp. Defrauding customers of the Club.
 - qq. Embezzlement.

- rr. Disloyalty to the Club, including but not limited to, slandering the Club, or acting in such a manner that could damage the Club's reputation.
- ss. Moral turpitude.
- tt. Failure to wear assigned uniform.
- uu. Entering or leaving the property through any entrance or exit other than the designated employee entrance or exit.
- vv. Punching in/out with another employee's I.D. Card or allowing another employee to punch in/out on your card.
- ww. Unauthorized attendance at guest functions and/or in guest areas, or on the premises including guest rooms, dining rooms and lounges. No unauthorized social contact will be permitted at any time with Club guests.
- xx. Discourteous or inappropriate conduct with guests/members.
- yy. Using guest elevators, escalators, restrooms or any guest facility except when specifically required by job functions or authorized by management.
- zz. Gum chewing, eating or drinking in any public area of the Club.
- aaa. Soliciting gratuities from guests or commenting on the amount of a gratuity.

UNIFORMS AND PERSONAL APPEARANCE

A. UNIFORMS

Employees issued a uniform are responsible for turning their soiled uniform to the Laundry Department at the end of their shift and picking up a clean one for the next day of work. All employee uniforms are laundered by the Club at no charge to the employee.

B. PERSONAL APPEARANCE

Departure from conventional Club attire or personal grooming are not permitted, regardless of the nature of the job performed.

- (1) Every employee has some contact with the public and therefore represents the Club in appearance as well as by actions. The properly attired employee helps to create a favorable image for the Club. Accordingly, personal appearance shall be governed by the following standards:

Good hygiene and grooming practices are required. A daily bath or shower is a necessity and all employees should report to work freshly bathed. Keep in mind you may be going from a hot kitchen to an air conditioned guest room. Body temperatures will change quickly and body odors are offensive. Remember, there is no substitute for good deodorant. Bad breath is also offensive and mouthwash should be used in addition to brushing teeth.

Good hygiene and grooming practices are required. Fingernails, and hair must be clean and neatly trimmed at all times.

Beards, goatees, and un-trimmed sideburns are not permitted. Mustaches must be neatly trimmed. Men's hair should not exceed collar length and must be conservatively styled.

Visible body piercing is not permitted for men or women, nor ear jewelry for men.

Hair must be neatly arranged and kept from covering eyes, and must be covered or restrained where required by health code.

All employees must wear their nametags (to be provided) at all times while on duty.

All employees are expected to report to work in clean, neatly pressed clothing, clean shoes and clean personal appearance.

Female employees who are not required to wear a uniform may wear suits, dresses, skirts or slacks with blouses or sweaters. "Mini" skirts are not permissible.

No blue jeans or jeans of any color are permitted. Denim outfits resembling blue jeans and jean skirts are also unacceptable. No strapless or backless garments may be worn. Females must wear the proper undergarments, including a bra and a full or half slip where necessary, depending on the sheerness of the outer garment. Hose are required with skirts and dresses. Hose or socks are required with pants.

Jewelry: For safety reasons, jewelry should be kept to a minimum. Acceptable jewelry for service employees is a wrist watch and a total of three rings. Female service employees are allowed to wear one pair of small earrings (no larger than a dime). Non guest contact female employees are allowed to wear a maximum of two earrings in each ear.

Tattoos: Exposed tatoos are not allowed on any public contact employees.

FULL TIME YEAR ROUND EMPLOYEES - During the summer months when the Club is closed and there is no public contact you may see your Department Head as to what is considered to be proper attire for your position.

- (2) Supervisors have the responsibility to decide when an employee's appearance is unacceptable. In the event of an unacceptable appearance, the Supervisor may request that the employee return home to change or take an appropriate corrective action. The employee generally shall not be compensated for any such time away from work, and repeated violations of this Policy will be cause for disciplinary action.

AIDS POLICY

The Club recognizes that Acquired Immune Deficiency Syndrome (AIDS), its related conditions such as AIDS Related Complex (ARC), and persons with seropositive test results pose significant and delicate issues for employees in the workplace.

Accordingly, we have established the following guidelines for handling employee issues that arise when an employee is affected by this disease.

(1) The Club is committed to maintaining a safe and healthy work environment for all employees.

(2) Consistent with this commitment, the Club will treat AIDS the same as other illnesses in terms of all our employee policies and benefits, such as group health and disability benefits.

(3) Based on the overwhelming preponderance of available medical and scientific opinion, including statements from the U.S. Public Health Service, Centers for Disease Control, there is no evidence that the AIDS virus is casually transmitted in ordinary social or occupational settings or conditions. Therefore, subject to changes in available medical information, it is the policy of the Club that employees with AIDS or any of its related conditions may continue to work and the Club will provide them with reasonable accommodation as long as they are medically able to perform the duties of their position.

(4) Employees who are affected by AIDS or any other life-threatening illness will be treated with compassion and understanding in dealing with their personal crises. Co-workers will be expected to not refuse to work or withhold their services for fear of contracting AIDS by working with an AIDS affected person, and to not harass or otherwise discriminate against an AIDS-affected employee.

(5) Recognizing the need for all employees to be able to be accurately informed about AIDS, upon request, the Club will make every effort to have information available regarding the facts about this disease, how it is transmitted and not transmitted and how best to contain it from spreading. Employees affected by AIDS or any of its related conditions or concerned about AIDS are encouraged to contact Human Resources Manager to discuss their concerns and to obtain additional information.

(6) The Club will treat all medical information obtained from employees with AIDS or any of its related conditions confidentially as required by law.

The Club reserves the right to change this policy or make appropriate revisions, additions, amendments or corrections. We will notify you of any substantive changes.

If you have any questions about this policy or its interpretation or the information upon which it is based, please contact the Human Resources Manager.

SUBSTANCE ABUSE POLICY

Our Club strives to provide a safe work environment and encourages personal health. In regard to this, the Club considers the abuse of drugs or alcohol on the job to be an unsafe and counterproductive work practice. Quite simply, our goal is to maintain a work environment that is free from the effects of alcohol and drug abuse.

While the Club has no intention of intruding into the private lives of its employees, the Club does expect employees to report for work in condition to perform their duties. It is, therefore, Club policy that an employee found with the presence of alcohol or illegal drugs in his/her system, in possession of, using, selling, trading, or offering for sale illegal drugs or alcohol during working hours, may be subject to disciplinary action up to and including discharge. (Club sponsored activities which may include the service of alcoholic beverages are not included in this provision.)

Substance Abuse includes possession, use, purchase or sale of drugs or alcohol on Club premises. It also includes reporting to work under the influence of drugs or alcohol. Prescription drugs-prescribed by the employee's physician may be taken during work hours. The employee should notify the Supervisor if the use of properly prescribed prescription drugs will affect the employee's work performance. Abuse of prescription drugs will not be tolerated.

An employee reporting for work visibly impaired is unable to properly perform required duties and will not be allowed to work.

POLICY ON SMOKING

Smoking is prohibited by any staff employee of The Mar-a-Lago Club on any and all properties adjacent to or that of The Mar-a-Lago Club to include:

124 Woodbridge Road
Palm Beach, FL

1094 Woodbridge Road
Palm Beach, FL

DRUG/ALCOHOL USE AND TESTING

The Mar-a-Lago Club recognizes that employee drug abuse interferes with the Club's level of production, as well as its competitive position in the marketplace, and can result in costs, delays, and tragedies associated with work-related accidents. As a condition to employment or continued employment, you must refrain from reporting to work or working with the presence of drugs or alcohol in your body.

To address the problem of drug/alcohol abuse and to comply with Florida's Workers' Compensation Drug-Free Workplace Act (the Act) The Mar-a-Lago Club adopts the policies and procedures detailed below. This policy will be administered in accordance with all relevant laws (state and local), including the ADA, the Florida Civil Rights Act, the Workers' Compensation Act, and in a non-discriminatory fashion.

To protect the health, safety, and welfare of all Mar-a-Lago Club employees, it is the Club's policy that the unlawful manufacture, distribution, dispensation, possession, or use of controlled substance on any Club property is absolutely prohibited. Controlled substances include, but are not limited to, amphetamines, barbiturates, cocaine, heroin, morphine, PCP, marijuana, hashish, and any other controlled substance listed in Schedules I through V of Section 202 of the Controlled Substance Act, 21 U.S.C. § 812 or in the Florida Statute on controlled substances, except for medication prescribed by the employee's physician.

You are also prohibited from drinking alcohol during the business day. You are also prohibited from bringing alcoholic beverages onto the Club premises. Special care shall be taken during Company-sponsored social events for employees. In these cases, employees and guests below the legal age will not be allowed to drink alcoholic beverages. The amount of time alcohol is served will be limited as well as the quantity of the alcohol. If necessary, transportation will be arranged for someone if his or her driving ability seems to be impaired.

The Mar-a-Lago Club will test for the presence of drugs under the following circumstances: 1) pre-employment testing, 2) reasonable suspicion testing (including post-accident incidents), and 3) follow-up testing. Such testing will be done in accordance with the Worker's Compensation Drug Testing Program, which policy had been given to all employees or can be obtained from the Human Resources Manager. Refusal to submit to the test or having a confirmed, positive test result will result in immediate discipline, including termination. Any questions about this policy should be referred to the Human Resources Manager.

Any violation of The Mar-a-Lago Club's Drug/Alcohol Free Workplace Policy will result in appropriate discipline, up to and including termination.

THIS POLICY REPRESENTS THE MAR-A-LAGO CLUB'S CURRENT POLICY FOR DEALING WITH A SERIOUS NATIONAL PROBLEM WHICH POSES A SAFETY THREAT TO THE WORKFORCE. THIS POLICY MAY BE CHANGED BY THE MAR-A-LAGO CLUB IN ITS DISCRETION. THIS POLICY IS NOT INTENDED TO CREATE A CONTRACT BETWEEN THE MAR-A-LAGO CLUB AND ANY EMPLOYEE. NOTHING IN THIS POLICY CHANGES THE CLUB'S ABILITY TO TERMINATE AN EMPLOYEE AT WILL, WITH OR WITHOUT CAUSE OR NOTICE.

MISCELLANEOUS

A. STAFF CAFETERIA

For the purpose of control, the Cafeteria must remain for use of Club employees only. Any exceptions to this rule must be cleared by your department head in advance. In addition, all employees must adhere to the rules posted in the Cafeteria concerning its use. You are entitled to one meal per eight hour shift only.

B. LOCKERS

Those employees issued lockers are obligated to keep them clean and use them for storage of a change of clothing only. Lockers are not the areas for storage of valuables. Lockers are subject to inspection by management. Unauthorized materials such as alcoholic beverages, weapons, Club property and illegal drugs are prohibited. The Mar-a-Lago Club is not responsible for lost or stolen property.

C. PHONES

Employees on duty are not allowed to use the public phones in the lobbies or any guest areas. Phones are furnished outside the staff dining room for employee use.

D. LOST AND FOUND ARTICLES

You must turn in lost and found articles to your supervisor, the Security Department or a security officer at Post One.

E. GIFTS

Gifts from guests of the Club of a value exceeding \$25.00 are not to be accepted by employees of The Mar-a Lago Club unless approved in writing by the Department Head. No employee shall accept any gift from any vendor.

F. "RIGHT TO KNOW STATION,"

The Occupational Safety Hazard Administration requires all employees be provided with information of all potentially hazardous substances used in the course of our daily business. The location of these documents (Material Safety Data Sheets) is in the staff dining room on the wall adjoining the Food and Beverage office.

G. EMPLOYEE ENTRANCE AND EXIT

All employees required to log in and log out their daily time must enter and exit the building through the entrance on the east side of the house leading to Post One.

TERMINATION PROCEDURES

Clearance Process

- a. Clearance of locker.
- b. Return of uniform to Laundry.
- c. Nametag, locker key, any property keys, and uniform returned to Executive Office.
- d. Any outstanding accounts settled.

NOTE: If you abandon your job without notice, your final paycheck will not be mailed until you have returned to the Club and completed the clearance process.

IF YOU LEAVE EMPLOYMENT

RESIGNATION POLICY

When an employee decides to leave for any reason, his/her supervisor and the Human Resources Manager would like the opportunity to discuss the resignation before final action is taken. The Mar-a-Lago Club often finds during such a conversation that another alternative may be better. If, however, after full consideration the employee decides to leave, it is expected that the employee will provide the Club with a written two-week advance notice period (bear in mind that vacation days or personal days may not be included in the two-week notice period). Generally, in order to qualify for payment of earned unused vacation, the employee must work throughout the notice period. If, as sometimes happens, the employee's supervisor believes it advisable for the employee to leave prior to the end of the employee's two-weeks notice, the employee may be paid for the remainder of that period. Note: You are not entitled to be paid for any unused, accrued sick time.

DISMISSALS

Every Mar-a-Lago employee has the status of "employee-at-will", meaning that no one has a contractual right, express or implied, to remain in The Mar-a-Lago Club's employ. The Club may terminate an employee's employment, or an employee may terminate his/her employment, with or without cause, and with or without notice, at any time. No supervisor or other representative of the Club (except the owner) has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the above.

IMMEDIATE DISMISSALS - MISCONDUCT

Any employee whose conduct, actions or performance violates or conflicts with the Club's policies may be terminated immediately and without warning.

The following are some examples of grounds for immediate dismissal of an employee:

- *Breach of trust or dishonesty
- *Conviction of a felony
- *Willful violation of an established policy or rule
- *Falsification of Club records
- *Gross negligence
- *Insubordination
- *Fighting or serious breach of acceptable behavior
- *Violation of the Alcohol or Drug Policy

*Theft

*Violation of the Club's Conflict of Interest/Outside Employment Policy and/or Confidentiality Policy.

This listing is not exhaustive.

Should the employee be covered in our group health plan, all benefits will cease on the last day of the month in which the employee's last day of employment falls. The employee will then have the option to continue coverage in accordance with COBRA regulations.

In the event that the employee is asked to leave his/her employment with The Mar-a-Lago Club due to the above misconduct, the employee will not be entitled to any earned unused vacation benefits. Also, the employee will not be entitled to be paid for any unused accrued sick time.

DISMISSALS - OTHER THAN IMMEDIATE TERMINATION

All employees are expected to meet the Club's standards of work performance. Work performance encompasses many factors, including attendance, punctuality, personal conduct, job proficiency and general compliance with the Club's policies and procedures.

If an employee does not meet these standards, the Club, may, under appropriate circumstances, take corrective action, up to and including dismissal.

The intent of corrective action is to formally document problems while providing the employee with a reasonable time within which to improve performance. The process is designed to encourage development by providing employees with guidance in areas that need improvement such as poor work performance, attendance problems, personal conduct, general compliance with the Club's policies and procedures and/or other disciplinary problems.

Supervisors should use the procedure described below except in those cases which may require an employee's immediate termination.

WRITTEN WARNINGS:

The supervisor should discuss the problem and present a written warning to the employee. This should clearly identify the problem and outline a course of corrective action within a specific time frame. The employee should clearly understand both the corrective action and the consequence (i.e., termination) if the problem is not corrected or recurs. The employee should acknowledge receipt of the warning and include any additional comments of their own before signing it. A record of the discussion and the employee's comments should be placed in the employee's personnel file.

POST RESIGNATION/TERMINATION PROCEDURES

The Human Resources Manager is responsible for scheduling an exit interview with a terminating employee on the employee's last day of employment and for arranging the return of Club property including:

1. Club issued credit card
2. Club manuals
3. Office keys
4. Beeper
5. Two-way radio
6. Any additional club-owned or issued property

In order to receive a disbursement of any amounts due from the Retirement Plan, the employee is required to complete and sign a distribution form which can be obtained from the Human Resources Manager. Specific information will be provided at the exit interview.

Employees may choose the continuation of medical benefits under COBRA. Specific information will be provided by the Human Resources Manager at the exit interview.

Benefits (Life and Medical) end on the last day of the month in which the employee's last day of employment falls. An employee has the option to continue Medical Benefits in accordance with The Consolidated Omnibus Budget Reconciliation Act ("COBRA") regulations.

Employees leaving the Club must return office keys, club credit cards, etc., before their final paycheck can be issued. This final paycheck will be mailed during the next normal pay period. If there are unpaid obligations to the Club, the final paycheck will reflect the appropriate deductions.

VACATION PAY

Vacation pay is calculated in accordance with our vacation policy. If the employee took more vacation days than he/she was entitled to under the vacation policy, the time will be deducted from the employees final paycheck.

RETIREMENT PLAN

If an employee is in the retirement plan, information regarding this plan will be provided at the exit interview.

EMPLOYEE HANDBOOK RECEIPT

INSTRUCTIONS: PLEASE READ THIS PERSONNEL POLICIES AND PROCEDURES EMPLOYEE HANDBOOK CAREFULLY. IF YOU DO NOT UNDERSTAND ANY PORTION OF IT, ASK FOR AN EXPLANATION FROM THE CLUB MANAGER'S OFFICE. RETURN THIS SIGNED RECEIPT TO THE CLUB MANAGER'S OFFICE IMMEDIATELY AFTER YOU HAVE RECEIVED THIS MANUAL. PLEASE KEEP THE HANDBOOK FOR FUTURE REFERENCE.

I received the Policy Manual of The Mar-A-Lago Club, L.C. on the date indicated below. I will carefully read the policies, procedures, and other information contained in the Manual and will ask the Club Manager's office for an explanation if I do not fully understand them. I agree as a condition of my employment to comply with the policies and procedures which exist now or which may come into existence in the future. I understand that if I do not comply with the policies and procedures, I may be subject to disciplinary action. I also understand that I or the Club may terminate employment at any time, for any reason.

The Club reserves the right to modify or terminate any policies or procedures, in whole or in part, at any time, with or without notice. I understand that only the Managing Director is authorized to set policy or make any promises with respect to my employment. The language used in this Handbook is not intended to create, nor is it to be construed to constitute, a contract between the Club and any one or all of its employees.

Date

Employee's Name

Employee's Signature

159816

EXHIBIT V

Vicki Yawnick:

Please run the following this Saturday October 14 and Sunday October 15:

THE MAR-A-LAGO CLUB

Private Club in Palm Beach now seeking qualified individuals for the following seasonal positions:

- *Wait Staff**
- *Asst. Food Server**
- *Banquet Servers**
- *P.M Sous Chef**
- *Asst. Banquet Chef**
- *Line Cooks**
- *Pastry Cooks**
- *Steward**
- *Dishwashers**
- *Housekeepers- 11pm-3am**
- *Houseperson – 11 pm-3am**
- *Valet – must have a clean driving record.**
- *Salon Asst.**
- *Nail Technician**
- *Make-Up Artist – Part Time**
- *License Massage Therapist-must have experience in wet treatments.**
- *Esthetician**
- *Spa Attendants – College students encourage to apply.**

Call Carol Ash, M-F, 9am-5pm,
(561) 833-8767, ext. 313 or fax
resume to (561) 832-2194.
Drug/Smoke Free Workplace. EOE

EXHIBIT 18
Giuttre
AGREN BLANDO REPORTING
10-14-16

EXHIBIT W

APPLICATION FOR EMPLOYMENT

PRE-EMPLOYMENT QUESTIONNAIRE
EQUAL OPPORTUNITY EMPLOYER

PERSONAL INFORMATION

NAME (LAST, FIRST)

Roberts Virginia L

DATE 3 26 02

PRESENT ADDRESS

CITY

Loxahatchee

STATE

FL

ZIP CODE

33470

CITY

STATE

ZIP CODE

PHONE NO.

(261) 796-1519

REFERRED BY

Michelle, Stacey, & Mr. Pinkwasser

EMPLOYMENT DESIRED

POSITION Reception / animal help	DATE YOU CAN START A.S.A.P	SALARY DESIRED negotiable
ARE YOU EMPLOYED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	IF SO, MAY WE INQUIRE OF YOUR PRESENT EMPLOYER? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
EVER APPLIED TO THIS COMPANY BEFORE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	WHERE?	WHEN?

EDUCATION HISTORY

NAME & LOCATION OF SCHOOL	YEARS ATTENDED	DID YOU GRADUATE?	SUBJECTS STUDIED
GRAMMAR SCHOOL			
HIGH SCHOOL	Survivors Charter	4	yes
COLLEGE			High School Diploma
TRADE, BUSINESS OR CORRESPONDENCE SCHOOL			

GENERAL INFORMATION

SUBJECTS OF SPECIAL STUDY, RESEARCH WORK OR SPECIAL TRAINING/SKILLS
I enjoy being around & helping animals, when I was younger I volunteered for 16 years at Vincennes Riding clinic, learning about animals
U.S. MILITARY OR NAVAL SERVICE
RANK

FORMER EMPLOYERS (LIST BELOW LAST FOUR EMPLOYERS, STARTING WITH LAST ONE FIRST)

DATE MONTH AND YEAR	NAME & ADDRESS OF EMPLOYER	SALARY	POSITION	REASON FOR LEAVING
FROM 1-02 TO 3-26-02	T.G.I.F.	2.15 + Tips	Server	Didn't leave
FROM 1-01 TO 1-02	MASSAGE Therapy	hourly	Training masseuse	my Trainer got ill
FROM 4-02 TO 1-01	Loxahatchee	8.50	Bird manager	School for Massage
FROM 7-08 TO 4-09	H.B.R.C.	9.25	Bird caretaker	Too long of Days

Adams 9861
APR 1998

APPLICATION FOR EMPLOYMENT

CONTINUED ON OTHER SIDE

EXHIBIT

9

AGREN BLANDO REPORTING

GIUFFRE009201
CONFIDENTIAL

REFERENCES GIVE BELOW THE NAMES OF THREE PERSONS NOT RELATED TO YOU, WHOM YOU HAVE KNOWN AT LEAST ONE YEAR

NAME	ADDRESS	BUSINESS	YEARS KNOWN
Mara Figueroa		Food	2
Bob Pavlik		Food delivery	5
Anthony Richards		Cashier	1 1/2

AUTHORIZATION

"I certify that the facts contained in this application are true and complete to the best of my knowledge and understand that, if employed, falsified statements on this application shall be grounds for dismissal.

I authorize investigation of all statements contained herein and the references and employers listed above to give you any and all information concerning my previous employment and any pertinent information they may have, personal or otherwise, and release the company from all liability for any damage that may result from utilization of such information.

I also understand and agree that no representative of the company has any authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the foregoing, unless it is in writing and signed by an authorized company representative.

This waiver does not permit the release or use of disability-related or medical information in a manner prohibited by the Americans with Disabilities Act (ADA) and other relevant federal and state laws."

DATE 3-26-02 SIGNATURE Virginia Roberts

INTERVIEWED BY _____ DATE _____

DO NOT WRITE BELOW THIS LINE

REMARKS

Until 3 PM	
Ven/Old, fluffy	EXCUSES:
Repeatedly set off alarm in office	- ENGINE FELL OUT
Attendance issues	- BROKEN AXLE
Failure to perform	- STUFF SET ON FIRE
Suspect drugs	
call in sick, late	

NEATNESS		CHARACTER		
PERSONALITY		ABILITY		
HIRED	FOR DEPT.	POSITION	WILL REPORT	SALARY WAGES

APPROVED: 1. _____ 2. _____ 3. _____
EMPLOYMENT MANAGER DEPARTMENT HEAD GENERAL MANAGER

This application for employment is sold only for general use throughout the United States. Adams assumes no responsibility and hereby disclaims any liability for the inclusion in this form of any questions or requests for information upon which a violation of local, state and/or federal law may be based. It is the user's responsibility to ensure that this form's use complies with applicable laws, which change from time to time.

GIUFFRE009202
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Monday, November 7, 2016
 1 Quicken Data - All Accounts

Page: 1

QuickReport by Description
 8/12/69 through 1/29/03

Date	Account	Num	Payee	Memo	Category	Clr
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		<i>split</i>	R
5/6/02	Courtyard Animal Hospital	1522	VOIDVirginia Roberts			R
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		<i>split</i>	R
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		<i>split</i>	R
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		<i>split</i>	R

Total 8/12/69 - 1/29/03

Total Inflows
 Total Outflows

Net Total

GIUFFRE009203
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Monday, November 7, 2016
1 Quicken Data - All Accounts

Page: 2

QuickReport by Description
8/12/69 through 1/29/03

Amount

-407.68
0.00
-380.35
-325.16
-156.08

-1,269.27

0.00
-1,269.27

-1,269.27

GIUFFRE009204
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Monday, November 7, 2016
1Quicken Data - All Accounts

Page: 1

Category Detail Report

4/1/02 through 7/1/02

Date	Account	Num	Payee	Memo	Category	Clr	Amount
Income/Expenses							
Expenses							
<u>Salary</u>							
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		Salary	R	-507.50
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		Salary	R	-472.50
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		Salary	R	-399.75
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		Salary	R	-182.00
Total Salary							-1,561.75
<u>Taxes:</u>							
<u>Social security</u>							
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		Taxes:Social security	R	38.82
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		Taxes:Social security	R	36.15
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		Taxes:Social security	R	30.59
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		Taxes:Social security	R	13.92
Total Social security							119.48
<u>Withholding</u>							
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		Taxes:Withholding	R	61.00
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		Taxes:Withholding	R	56.00
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		Taxes:Withholding	R	44.00
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		Taxes:Withholding	R	12.00
Total Withholding							173.00
Total Taxes							292.48
<u>Expenses - Other</u>							
5/6/02	Courtyard Animal Hospital	1522	VOIDVirginia Roberts			R	0.00
Total Expenses - Other							0.00
Total Expenses							-1,269.27
Total Income/Expenses							-1,269.27

April 2002 Payroll

		Paycheck 1	Paycheck 2	Paycheck 3	Total
[REDACTED]	Social Security Withholding	\$ [REDACTED] \$ [REDACTED]	\$ [REDACTED] \$ [REDACTED]		\$ [REDACTED] \$ [REDACTED]
[REDACTED]	Social Security Withholding	\$ [REDACTED] \$ [REDACTED]	\$ [REDACTED] \$ [REDACTED]		\$ [REDACTED] \$ [REDACTED]
[REDACTED]	Social Security Withholding	\$ [REDACTED] \$ -	\$ [REDACTED] \$ [REDACTED]		\$ [REDACTED] \$ [REDACTED]
[REDACTED]	Social Security Withholding	\$ [REDACTED] \$ [REDACTED]	\$ [REDACTED] \$ [REDACTED]		\$ [REDACTED] \$ [REDACTED]
Jenna	Social Security Withholding		\$ 38.82 \$ 61.00		\$ 38.82 \$ 61.00
[REDACTED]	Social Security Withholding		\$ [REDACTED] \$ [REDACTED]		\$ [REDACTED] \$ [REDACTED]

Monthly Totals

Social Security
Withholding

\$ [REDACTED] x2=
\$ [REDACTED]

\$ [REDACTED]
\$ [REDACTED]

Total Liability

\$ [REDACTED]

May 2002 Payroll

		Paycheck 1	Paycheck 2	Paycheck 3	Total
[REDACTED]	Social Security	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
	Withholding	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
[REDACTED]	Social Security	\$ [REDACTED]	\$ [REDACTED]		\$ [REDACTED]
	Withholding	\$ [REDACTED]	\$ [REDACTED]		\$ [REDACTED]
[REDACTED]	Social Security	\$ [REDACTED]	\$ [REDACTED]		\$ [REDACTED]
	Withholding	\$ [REDACTED]	\$ [REDACTED]		\$ [REDACTED]
[REDACTED]	Social Security	\$ [REDACTED]			\$ [REDACTED]
	Withholding	\$ [REDACTED]			\$ [REDACTED]
Jenna	Social Security	\$ 36.15	\$ 30.59		\$ 66.74
	Withholding	\$ 56.00	\$ 44.00		\$ 100.00
[REDACTED]	Social Security				\$ [REDACTED]
	Withholding				\$ [REDACTED]

Monthly Totals

Social Security
Withholding

\$ [REDACTED] x2=

\$ [REDACTED]4
\$ [REDACTED]

Total Liability

\$ [REDACTED]

June 2002 Payroll

		Paycheck 1	Paycheck 2	Paycheck 3	Total
	Salary				\$
	Social Security	\$	\$	\$	\$
	Withholding	\$	\$	\$	\$
	Salary	\$	\$		\$
	Social Security	\$	\$		\$
	Withholding	\$	\$		\$
	Salary	\$	\$		\$
	Social Security	\$	\$		\$
	Withholding	\$	\$		\$
	Salary				\$
	Social Security				\$
	Withholding	\$			\$
Jenna	Salary	\$ 182.00			\$ 182.00
	Social Security	\$ 13.92	\$		\$ 13.92
	Withholding	\$ 12.00	\$		\$ 12.00
	Salary				\$
	Social Security				\$
	Withholding				\$

Monthly Totals

Salary

Social Security

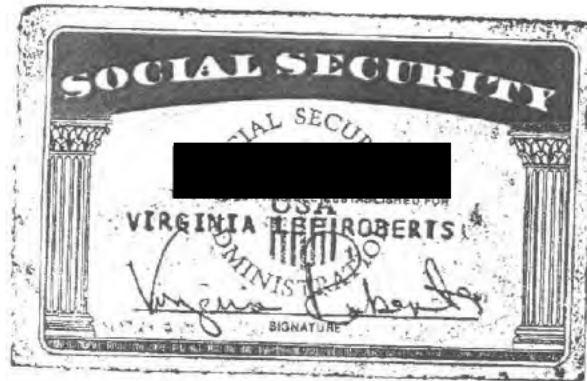
Withholding

\$ x2=

\$

Total Liability

\$



05/29/2001 13:12 3055533543

ALLEN SHAPPE

PAGE 01

Form W-4 (2001)

Purpose. Complete Form W-4 so your employer can withhold the correct Federal income tax from your pay. Because your tax situation may change, you may want to refigure your withholding each year.

Exemption from withholding. If you are exempt, complete only lines 1, 2, 3, 4, and 7, and sign the form to validate it. Your exemption for 2001 expires February 15, 2002.

Notes: You cannot claim exemption from withholding if (1) your income exceeds \$750 and includes more than \$250 of unearned income (e.g., interest and dividends) and (2) another person can claim you as a dependent on their tax return.

Basic instructions. If you are not exempt, complete the **Personal Allowances Worksheet** below. The worksheets on page 2 adjust your withholding allowances based on itemized deductions, certain credits, adjustments to

income, or two-earner/two-job situations. Complete all worksheets that apply. They will help you figure the number of withholding allowances you are entitled to claim. However, you may claim fewer (or zero) allowances.

Head of household. Generally, you may claim head of household filing status on your tax return only if you are unmarried and pay more than 50% of the costs of keeping up a home for yourself and your dependent(s) or other qualifying individuals. See line E below.

Tax credits. You can take projected tax credits into account in figuring your allowable number of withholding allowances. Credits for child or dependent care expenses and the child tax credit may be claimed using the **Personal Allowances Worksheet** below. See Pub. 918, **How Do I Adjust My Tax Withholding?** for information on converting your other credits into withholding allowances.

Nonwage income. If you have a large amount of nonwage income, such as interest or dividends,

consider making estimated tax payments using Form 1040-ES, **Estimated Tax for Individuals**. Otherwise, you may owe additional tax.

Two earners/two jobs. If you have a working spouse or more than one job, figure the total number of allowances you are entitled to claim on all jobs using worksheets from only one Form W-4. Your withholding usually will be most accurate when all allowances are claimed on the Form W-4 for the highest paying job and zero allowances are claimed on the others.

Check your withholding. After your Form W-4 takes effect, use Pub. 919 to see how the dollar amount you are having withheld compares to your projected total tax for 2001. Get Pub. 919 especially if you used the **Two-Earner/Two-Job Worksheet** on page 2 and your earnings exceed \$160,000 (Single) or \$200,000 (Married).

Recent name change? If your name on line 1 differs from that shown on your social security card, call 1-800-772-1213 for a new social security card.

Personal Allowances Worksheet (Keep for your records.)

A Enter "1" for yourself if no one else can claim you as a dependent. A 1

B Enter "1" if: B 1

- You are single and have only one job; or
- You are married, have only one job, and your spouse does not work; or
- Your wages from a second job or your spouse's wages (or the total of both) are \$1,000 or less.

C Enter "1" for your spouse. But, you may choose to enter -0- if you are married and have either a working spouse or more than one job. (Entering -0- may help you avoid having too little tax withheld.) C 0

D Enter number of dependents (other than your spouse or yourself) you will claim on your tax return. D 0

E Enter "1" if you will file as head of household on your tax return (see conditions under **Head of household** above). E 0

F Enter "1" if you have at least \$1,500 of child or dependent care expenses for which you plan to claim a credit. F 0

(Note: Do not include child support payments. See Pub. 803, **Child and Dependent Care Expenses**, for details.)

G Child Tax Credit (including additional child tax credit): G 0

- If your total income will be between \$18,000 and \$50,000 (\$23,000 and \$63,000 if married), enter "1" for each eligible child.
- If your total income will be between \$50,000 and \$80,000 (\$63,000 and \$115,000 if married), enter "1" if you have two eligible children, enter "2" if you have three or four eligible children, or enter "3" if you have five or more eligible children.

H Add lines A through G and enter total here. (Note: This may be different from the number of exemptions you claim on your tax return.) H 2

For accuracy, complete all worksheets that apply.

- If you plan to itemize or claim adjustments to income and want to reduce your withholding, see the **Deductions and Adjustments Worksheet** on page 2.
- If you are single, have more than one job and your combined earnings from all jobs exceed \$35,000, or if you are married and have a working spouse or more than one job and the combined earnings from all jobs exceed \$60,000, see the **Two-Earner/Two-Job Worksheet** on page 2 to avoid having too little tax withheld.
- If neither of the above situations applies, stop here and enter the number from line H on line 6 of Form W-4 below.

Cut here and give Form W-4 to your employer. Keep the top part for your records.

Form W-4 Department of the Treasury Internal Revenue Service	Employee's Withholding Allowance Certificate For Privacy Act and Paperwork Reduction Act Notice, see page 2.	OMB No. 1545-0010 2001
1 Type or print your first name and middle initial Last name <u>Virginia L Roberts</u>		
Home address (number and street or rural route) <u>11000 11th St NW</u>		
City or town, state, and ZIP code <u>Washington, DC 20001</u>		
3 <input checked="" type="checkbox"/> Single <input type="checkbox"/> Married <input type="checkbox"/> Married, but withheld at higher Single rate. Note: If married, but legally separated, or spouse is a nonresident alien, check the Single box.		
4 If your last name differs from that on your social security card, check here. You must call 1-800-772-1213 for a new card. <input type="checkbox"/>		
5 Total number of allowances you are claiming (from line H above or from the applicable worksheet on page 2)		5 <u>2</u>
6 Additional amount, if any, you want withheld from each paycheck		6 <u>\$0</u>
7 I claim exemption from withholding for 2001, and I certify that I meet both of the following conditions for exemption: • Last year I had a right to a refund of all Federal income tax withheld because I had no tax liability and • This year I expect a refund of all Federal income tax withheld because I expect to have no tax liability. If you meet both conditions, write "Exempt" here 7 <u>Exempt</u>		
Under penalties of perjury, I certify that I am entitled to the number of withholding allowances claimed on this certificate, or I am entitled to claim exempt status. Employee's signature (Form is not valid unless you sign it) <u>Virginia Roberts</u> Date <u>5/16/02</u>		
8 Employer's name and address (Employer: Complete lines 8 and 10 only if sending to the IRS.)		9 Office code (optional) 10 Employer identification number

Cat. No. 102200

GIUFFRE009210
CONFIDENTIAL

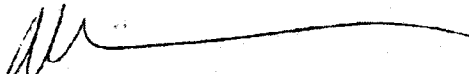
**Courtyard Animal Hospital
13860-31 Wellington Trace
Wellington, FL 33414
(561) 784-7387**

Ms. Roberts (jenna),

It is obvious that you have a number of personal issues going on that need your immediate attention and keep you from being able to focus on and perform the material duties of your job here at Courtyard Animal Hospital.

In the short time you have been employed here, you have missed multiple days, arrived late, called in sick multiple times. The reasoning you have given has shown that you are "distracted" at minimum. Between your "engine falling out of your car, your axle breaking off which your boyfriend 'repaired it roadside' and your landlord tossing all your furniture and clothing out in the front yard and setting it on fire", it is clear that you have more pressing issues in your life to focus on. You have been unable to perform to an acceptable standard within our company.

It is because of your inability to perform your duties here, be in attendance when scheduled and focus on the job requirements that we are forced to terminate your employment.



Dr. Pinkwasser

EXHIBIT X

 Date: 4/25/16 ROYAL PALM BEACH POLICE DEPARTMENT Page: 1
 Time: 8:52:02 Offense Report Program: CMS301L

Day Of Week : Sunday Report Date : 6/10/01 21:25
 Occur From Date: 6/10/01 21:00 Occur To Date : 6/10/01 21:05
 Dept Class : BURGLARY - Non-Vehicle
 Street Number : [REDACTED]
 City : ROYAL PALM BEACH, FL 33411
 Zone/division : Zone One (1) (No of Okee)
 Location Type : APARTMENT/CONDO Case Status : EXCEPTIONALLY CLEARED
 Report Officer : WOOD, FRANK Supervisory Emp: HUGHES, THOMAS 6/17/01
 Case Status Dt : 8/21/01

***** C A S E M A N A G E M E N T I N F O R M A T I O N *****
 Case Number : 1-01-002214 Dept Class : BURGLARY - Non-Vehicle
 Case Status : EXCEPTIONALLY CLEARED Case Status Dt : 8/21/01
 Investigator : KACZOR, K.

ASSIGNMENT HISTORY

Case Number : 1-01-002214 Dept Unit : DETECTIVE
 Investigator : KACZOR, KENNETH Supervisor : ROBKin, ROBERT
 Assignment Date: 6/19/01

***** O F F E N S E R E P O R T # 1 *****
 State Class : Burglary - Non-Vehicle
 Attmpt/Committ : Committed Statute/Ordin : 810.02(4B)
 Forced Entry : Yes Premises Enter : 1
 Structure Occup: Unoccupied

***** O F F E N S E R E P O R T # 2 *****
 State Class : Assault Simple Attmpt/Committ : Committed
 Statute/Ordin : 784.03(1A) Weapon Type : Hands/Fists/Feet

***** O F F E N S E P R I M A R Y R E L A T I O N S H I P S *****
 Offense #: 001 Burglary - Non-Vehicle / / 810.02(4B)
 Name #...: 001 (SUSP) UNKNOWN,
 Name #...: 001 (VICT) AUSTRICH, JAMES M.
 Offense #: 002 Assault Simple / / 784.03(1A)
 Name #...: 001 (SUSP) UNKNOWN,
 Name #...: 001 (VICT) AUSTRICH, JAMES M.

***** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 1 **
 Case Number : 1-01-002214 Prompt valid in: UNKNOWN,
 City : ROYAL PALM BEACH, FL 33411
 Home Phone No. : 561/000-0000 Business Phone : 561/000-0000
 Race : Unknown Sex : Unknown
 Ethnic Origin : Hispanic

***** W I T N E S S I N F O R M A T I O N - # 1 *****
 Case Number : 1-01-002214 Last Name : PERKINS JR, JOHN MARTIN
 Street Number : [REDACTED]
 City : ROYAL PALM BEACH, FL 33411
 County : PALM BEACH Home Phone No. : [REDACTED]
 Business Phone : [REDACTED] Birth Date : [REDACTED]
 Birth Country : Unknown
 Oper Lic No. : [REDACTED] FL United States
 Race : White Sex : Male

CERTIFIED
 TO BE A TRUE COPY
 RIC L. BRADSHAW, SHERIFF
 GM_00780

Date: 4/25/16
Time: 8:52:02

ROYAL PALM BEACH POLICE DEPARTMENT
Offense Report

Page: 2
Program: CMS301L

1-01-002214 (Continued)

Ethnic Origin : WHITE

***** V I C T I M I N F O R M A T I O N - # 1 *****

Case Number : 1-01-002214 Prompt valid in: AUSTRICH, JAMES MICHAEL
Street Number : [REDACTED]
City : ROYAL PALM BEACH, FL 33411
County : PALM BEACH Home Phone No. : [REDACTED]
Business Phone : 561/000-0000 Birth Date : [REDACTED]
Birth Country : Unknown Oper Lic Cntry : Unknown
Race : White Sex : Male
Ethnic Origin : WHITE Victim Type : Adult

***** O T H E R P E R S O N I N F O R M A T I O N - # 1 *****

Case Number : 1-01-002214 Last Name : ROBERTS, VIRGINIA L
Person Type : OTHER PERSON
Street Number : 368 BENT OAK DR
City : ROYAL PALM BEACH, FL 33411
County : PALM BEACH Home Phone No. : [REDACTED]
Business Phone : 561/714-5252 Birth Date : [REDACTED]
Birth Country : Unknown Oper Lic Cntry : Unknown
Race : White Sex : Female
Ethnic Origin : WHITE Height : 506
Weight : 103

***** N A R R A T I V E # 1 *****

Original Report Reported By: WOOD, FRANK T. 6/10/01
Entered By: JARRETT, DAWN M. 6/21/01

ON SUNDAY, JUNE 10, 2001 AT APPROXIMATELY 2124 HOURS, I RESPONDED TO [REDACTED], ROYAL PALM BEACH, FLORIDA IN REFERENCE TO A BATTERY COMPLAINT. UPON MY ARRIVAL I MET WITH THE VICTIM JAMES MICHAEL AUSTRICH. [REDACTED] AUSTRICH STATED THAT HIS EX-FIANCÉE VIRGINIA ROBERTS, WHO ALSO RESIDES AT THE ABOVE LISTED ADDRESS, BROUGHT HER FRIEND ANTHONY TO THE APARTMENT. AUSTRICH AND UNKNOWN SUSPECT ANTHONY DIDN'T GET ALONG. THE SUSPECT THEN BECAME VERBALLY ABUSIVE TO AUSTRICH. AUSTRICH THEN TOLD ANTHONY TO LEAVE THE APARTMENT. ANTHONY THEN BECAME AGITATED AND AGAIN AUSTRICH TOLD HIM TO LEAVE. AUSTRICH'S FRIEND JOHN PERKINS WAS PRESENT DURING THE ALTERCATION AND STATED IN A SWORN WRITTEN STATEMENT THAT HE ALSO TOLD ANTHONY TO LEAVE THE APARTMENT. PERKINS WAS IN FEAR THAT AUSTRICH AND ANTHONY WERE GOING TO FIGHT. ANTHONY FINALLY LEFT THE APARTMENT. AUSTRICH GOT THE APARTMENT DOOR CLOSED ANTHONY THEN REOPENED THE DOOR AND ENTERED THE APARTMENT WITHOUT AUSTRICH'S PERMISSION, AND PUNCHED AUSTRICH ON THE LEFT SIDE OF HIS FACE WITH A CLOSED FIST CAUSING MINOR SWELLING AND A LARGE RED MARK. PERKINS THEN WENT TO THE TELEPHONE AND CALLED POLICE. ANTHONY OBSERVED PERKINS ON THE TELEPHONE AND FLED THE SCENE PRIOR TO MY ARRIVAL.

AUSTRICH ALSO PROVIDED ME WITH A SWORN WRITTEN STATEMENT. I ASKED AUSTRICH IF HE NEEDED MEDICAL TREATMENT? AUSTRICH VERBALLY STATED THAT HE DID NOT NEED ANY MEDICAL TREATMENT.

CERTIFIED
TO BE A TRUE COPY
RIC L. BRADSHAW, SHERIFF

GM_00781

 Date: 4/25/16 ROYAL PALM BEACH POLICE DEPARTMENT Page: 3
 Time: 8:52:02 Offense Report Program: CMS301L

1-01-002214 (Continued)

***** N A R R A T I V E # 2 *****
 SUPPLEMENT Reported By: WOOD, FRANK T. 6/16/01
 Entered By.: JARRETT, DAWN M. 6/21/01

SINCE 6/10/01 NUMEROUS ATTEMPTS BY TELEPHONE AND IN PERSON HAVE
 BEEN MADE TO GET MORE SUSPECT INFORMATION. NOR JAMES AUSTRICH, JOHN
 PERKINS, AND OR VIRGINIA ROBERTS HAVE BEEN AT THE RESIDENCE OR
 ANSWERING MY TELEPHONE MESSAGES, AT THIS TIME I WISH CLASSIFY THIS
 CASE AS INACTIVE DUE TO SUSPECTS LACK OF COOPERATION.

***** N A R R A T I V E # 3 *****
 SUPPLEMENT Reported By: KACZOR, KENNETH A. 8/14/01
 Entered By.: KACZOR, KENNETH A. 8/14/01
 Reviewed By: PERVENECKI, DAVID A. 8/21/01

I have attempted contact with the victim numerous times and have been
 unsuccessful. Messages left with roommates have been ignored and the
 victim has refused to call me regarding this case. This case is
 exceptionally cleared due to the victim's lack of cooperation.

* * * * * E N D O F R E P O R T * * * * *

CERTIFIED
 TO BE A TRUE COPY
 RIC L. BRADSHAW, SHERIFF

GM_00782

EXHIBIT Y

ADMIN	CBTS Number _____ Agency ORI Number FLO 5 0 2 8 0 0	PROBABLE CAUSE AFFIDAVIT Agency Name ROYAL PALM BEACH POLICE DEPARTMENT	Agency Report Number 8 6 - 9 9 - 3 0 4 6	1. Arrest 2. N. 3. Request for Warrant 4. Request for Copies <div style="border: 1px solid black; width: 20px; height: 20px; text-align: center; line-height: 20px;">1</div>	Juvenile <input checked="" type="checkbox"/>
DEF	Charge Type: Check as many as apply. <div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony </div> <div> <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor </div> <div> <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other _____ </div> </div>				
CHARGES	Name (Last, First, Middle) FIGUEROA, ANTHONY				
VICTIM	Charge Description POSS OF MARIJUANA OVER 20 GRAMS				
PROBABLE CAUSE STATEMENT	Charge Description POSS. WITH INTENT TO SELL				
ADMINISTRATIVE	Charge Description POSS OF DRUG PARAPHERNALIA				
ADMINISTRATIVE	Charge Description POSS OF CONTROLLED SUBSTANCE				
Victim's Name (Last, First, Middle) STATE OF FLORIDA					
Local Address (Street, Apt., Number) (City) (State) (zip) Phone Address Source					
Business Address (Name, Street) (City) (State) (zip) Phone Occupation					
The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. The Person taken into custody ... <input checked="" type="checkbox"/> committed the below acts in my presence. <input type="checkbox"/> confessed to _____ admitting to the below facts. <input type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts. <input type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation. On the <u>19TH</u> day of <u>NOVEMBER</u> 19 <u>99</u> at <u>5:00</u> <input type="checkbox"/> A.M. <input checked="" type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)					
THE ROYAL PALM BEACH POLICE DEPARTMENT WITH MUTUAL AID FROM THE LAKE WORTH POLICE DEPARTMENT, PERFORMED A SEARCH WARRANT AT _____ PRESENT INSIDE THE _____ RESIDENCE WAS ANTHONY FIGUEROA, _____ ALL OCCUPANTS WERE READ THEIR MIRANDA RIGHTS BY OFFICER HECKLER (#115). THE SEARCH OF THIS RESIDENCE REVEALED THE FOLLOWING: INSIDE ANTHONY FIGUEROA'S BEDROOM (NORTHWEST BEDROOM) WAS APPROX 106 GRAMS OF SUSPECT MARIJUANA HIDDEN INSIDE A CAMOUFLAGE BAG, NEXT HIS BED ON THE BOTTOM SHELF OF A BOOK RACK. THIS SUSPECT MARIJUANA WAS INDIVIDUALLY WRAPPED IN PLASTIC 12 BAGS, PACKAGE FOR SALE. LOCATED IN ANOTHER BOOK SHELF WAS A SMALL PILL BOX WHICH ACCORDING TO ANTHONY FIGUEROA WAS "X-TASY" OR MDMA, WHICH IS A CONTROLLED SUBSTANCE. THROUGHOUT ANTHONY FIGUEROA'S BEDROOM WERE NUMEROUS USED NOS CANISTERS, A GLASS SMOKING PIPE, A BLACK BOX CONTAINING CRUSHED CIGARS INTERNALS, BALLOONS FOR "HUFFING", ALONG WITH POSTERS THAT CONTAINED MARIJUANA PLANTS AND DRUG REFERENCES. ALSO LOCATED IN THE BOOK SHELF WERE PHOTOS NEGATIVES OF ANTHONY FIGUEROA SMOKING FROM A LARGE "BONG". WHEN LAKE WORTH POLICE ENTERED _____, THEY DISCOVERED ANTHONY FIGUEROA INSIDE THE COMMON BATHROOM. A SEARCH OF THIS BATHROOM BY OFC. STRONG REVEALED A PLASTIC BAG CONTAINING 16 GMS OF SUSPECT MARIJUANA HIDDEN BETWEEN TWO TOWELS IN THE CLOSET. JUVENILE REFERRAL WAS ISSUED TO THE PARENT. NOTHING FURTHER.					
STATE OF FLORIDA - PALM BEACH COUNTY I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law. THIS <u>8</u> DAY OF <u>Aug</u> 20 <u>16</u> SHARON R. BOCK CLERK & COMPTROLLER By <u>[Signature]</u> DEPUTY CLERK					
SWORN AND SUBSCRIBED BEFORE ME <u>[Signature]</u> NOTARY PUBLIC / CLERK OF COURT / POLICE OFFICER 11-19-99 DATE					
SIGNATURE OF ARRESTING / INVESTIGATING OFFICER OFC. SEARING NAME OF OFFICER (PLEASE PRINT) 11-19-99 DATE					
DISTRIBUTION: WHITE -- Court Copy GREEN -- State Attorney YELLOW-- Agency PINK-- Agency GOLDENROD --					

ADMIN.	OBT Number	PROBABLE CAUSE AFFIDAVIT		1. Arrest 2. N.T.	3. Request for Warrant 4. Request for Capias	1	Juvenile <input checked="" type="checkbox"/>
CHARGES	Agency ORI Number FLO 5 0 2 8 0 0	Agency Name ROYAL PALM BEACH POLICE DEPARTMENT		Agency Report Number 8 6 - 9 9 - 3 0 4 6			
	Charge Type: Check as many as apply. <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony		<input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor		<input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other		
DEF.	Name (Last, First, Middle) Figueroa, Anthony		Alias		Race W	Sex M	Age 8 2
	Charge Description Poss. marijuana over 20 gms.		Charge Description Poss. with intent to sell				
VICTIM	Charge Description Poss. of Drug Paraphernalia		Charge Description Poss. of Controlled Substance (MDMA)				
	Victim's Name (Last, First, Middle) State Of Florida		Race		Sex	Date of Birth	
PROBABLE CAUSE STATEMENT	Local Address (Street, Apt., Number)		(City)	(State)	(zip)	Phone	Address Source
	Business Address (Name, Street)		(City)	(State)	(zip)	Phone	Occupation
<p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law, The Person taken into custody ...</p> <p><input type="checkbox"/> committed the below acts in my presence. <input type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts.</p> <p><input type="checkbox"/> confessed to _____ admitting to the below facts. <input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the _____ day of <u>April</u> <u>2000</u> 19 <u>xx</u> at _____ <input type="checkbox"/> A.M. <input checked="" type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p> <p style="text-align: center;">***** AMENDED PROBABLE CAUSE *****</p> <p>On 04-13 -00, I received from Evidence Custodian Fanelli, one pill inside a purple pill case seized from the search warrant executed on 11-19-99 on Anthony Figueroa residence. The purpose of this was to test this one pill for the presence of MDMA, using a heroin test kit. The pill tested positive for the presence of MDMA by turning the color black. It should be noted that on 11-19-1999, after Anthony Figueroa was read his Miranda rights, he was interviewed and admitted that the pill inside the purple case was indeed ecstasy or MDMA. This pill has a "Batman" symbol imprinted on it. This pill was placed back into evidence. Based on this information, I believe probable cause now exists for the poss. of a controlled substance (MDMA). Note, all suspect marijuana seized at _____ tested positive for narcotic content.</p> <p>This amended probable cause was sent to S/A Debra Colton for charge purposes. Nothing further.</p>							
<p>STATE OF FLORIDA • PALM BEACH COUNTY</p> <p>I hereby certify that the foregoing is a true copy of the record in my office with reductions, if any, as required by law.</p> <p>THIS <u>8</u> DAY OF <u>April</u> 20<u>00</u></p> <p>SHARON R. BOWEN CLERK & COMPTROLLER</p> <p>By <u>[Signature]</u> DEPUTY CLERK</p>							
ADMINISTRATIVE	<p>SWORN AND SUBSCRIBED BEFORE ME</p> <p><u>[Signature]</u> NOTARY PUBLIC / CLERK OF COURT / POLICE OFFICER</p> <p>04-17-2000 DATE</p>						
	<p>SIGNATURE OF ARRESTING / INVESTIGATING OFFICER</p> <p><u>[Signature]</u> Officer George Searing 101</p> <p>NAME OF OFFICER (PLEASE PRINT) 04-17-2000 DATE</p>						
<p>PAGE 1 OF 1</p> <p>GM_01224</p>							

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION W

ORIGINAL

STATE OF FLORIDA

CASE NO. 00-4937CF AOA
ISSUE WARRANT

vs.

ANTHONY LUIS FIGUEROA, W/M [REDACTED] [REDACTED]

DOROTHY H. WILKIN, CLERK
CIR. & CO. CT'S. P.B. CO. FL.
CIRCUIT CRIMINAL

00 MAY -4 PM 1:11

FILED

INFORMATION FOR:

- 1) POSSESSION OF SCHEDULE I SUBSTANCE
- 2) POSSESSION OF MARIJUANA IN EXCESS OF 20 GRAMS
- 3) POSSESSION OF PARAPHERNALIA (PRODUCTION)
- 4) POSSESSION OF PARAPHERNALIA (USE)

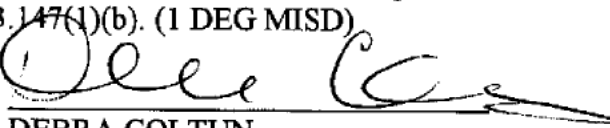
In the Name and by Authority of the State of Florida:

BARRY E. KRISCHER, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that ANTHONY LUIS FIGUEROA on or about November 19, 1999, in the County of Palm Beach and State of Florida, was unlawfully and knowingly in actual or constructive possession of a substance classified within Schedule I, Florida Statute 893.03(4), commonly known as MDMA, a controlled substance, contrary to Florida Statute 893.13(6)(a). (3 DEG FEL)

COUNT 2: Informant aforesaid, under oath, further information makes that ANTHONY LUIS FIGUEROA on or about November 19, 1999, in the County of Palm Beach and State of Florida, was unlawfully and knowingly in actual or constructive possession of more than 20 grams of a material, compound, mixture or preparation which contained cannabis, commonly known as marijuana, a controlled substance, contrary to Florida Statute 893.13(6)(a). (3 DEG FEL)

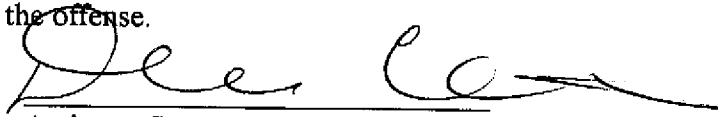
COUNT 3: Informant aforesaid, under oath, further information makes that ANTHONY LUIS FIGUEROA on or about November 19, 1999, in the County of Palm Beach and State of Florida, was unlawfully and knowingly in actual or constructive possession of bags, and/or a pill box, and/or a box, which was drug paraphernalia being used, intended for use, or designed for use in planting, propagating, cultivating, growing, harvesting, manufacturing, compounding, converting, producing, processing, preparing, testing, analyzing, packaging, repackaging, storing, containing or concealing a controlled substance, contrary to Florida Statute 893.147(1)(a). (1 DEG MISD)

COUNT 4: Informant aforesaid, under oath, further information makes that ANTHONY LUIS FIGUEROA on or about November 19, 1999, in the County of Palm Beach and State of Florida, was unlawfully and knowingly in actual or constructive possession of a pipe, and/or balloons, which was drug paraphernalia being used, intended for use, or designed for use in injecting, ingesting, inhaling, or otherwise introducing into the human body a controlled substance, contrary to Florida Statute 893.147(1)(b). (1 DEG MISD)


DEBRA COLTUN
FL. BAR NO. 0561622
Assistant State Attorney
Palm Beach County, Florida

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, DEBRA COLTUN Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.


Assistant State Attorney

Sworn to and subscribed to before me this 2 day of ^{MAY} April, 2000.


NOTARY PUBLIC, State of Florida

Citation Nos. (if applicable) ; ; ;



Eida Pasharikov
MY COMMISSION # 0043398 EXPIRES
April 29, 2001
BONDED THRU TROY PAW INSURANCE, INC.



STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any as required by law.

THIS 2 DAY OF May, 2000

SHARON R. BOSK
CLERK & COMPTROLLER

By 
DEPUTY CLERK

(As to Count(s) 1

22

CASE NO. W4937CF 1402 DIV. W

Nov-29-2008 02:05pm 00-455611
ORB 12162 Pg 924
DOROTHY H. WILKEN, CLERK PB COUNTY, FL

[] COMMUNITY
CONTROL
VIOLATOR

PROBATION
VIOLATOR

ANTHONY L. FIGUEROA
DEFENDANT

DEFENDANT

BZ W/M

FILED

JUDGMENT

NOV 21 2000

The above Defendant, being personally before this Court represented by T. Williams APD (attorney)

CIRCUIT & COUNTY COURTS

[] Having been tried and found guilty of the following crime(s):

Having entered a plea of guilty to the following crime(s):

[] Having entered a plea of nolo
contendere to the following
crime(s):

COUNT	CRIME	OFFENSE STATUTE NUMBER(S)	DEGREE	CASE NUMBER	OBTS NUMBER
1	POSS SCHEDULED SUBS (VOP)	893.13	3F		

and no cause having been shown why the Defendant should not be adjudicated guilty, IT IS ORDERED THAT the Defendant is hereby ADJUDICATED GUILTY of the above crime(s).

and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty, regardless of adjudication, to attempts or offenses relating to sexual battery (ch. 794), lewd and lascivious conduct (ch. 800), or murder (s. 782.04), aggravated battery (s. 784.045), carjacking (s. 812.133), or home invasion robbery (s. 812.135), or any other offense specified in section 943.325, the defendant shall be required to submit blood specimens.

and good cause being shown: IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD.

**SENTENCE
STAYED**

[] The Court hereby stays and withholds imposition of sentence as to count(s) and places the Defendant on [] Probation and/or [] Community Control under the supervision of the Dept. of Corrections (conditions of probation set forth in separate order).

SENTENCE
DEFERRED

☐ The Court hereby defers imposition of sentence until

The Defendant in Open Court was advised of his right to appeal from the Judgment by filing notice of appeal with the Clerk of Court within thirty days following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance of counsel in taking said appeal at the expense of the State upon showing of indigency.

DONE AND ORDERED in Open Court at West Palm Beach, Palm Beach County, Florida, this 21 day of NOV 2000

I hereby certify that the foregoing is a true copy of the record in my office with regulations, in any as required by law.

THIS 05 DAY OF July, 2008
SHARON R. BOCH
CLERK & COMPTROLLER

By [Signature]
DEPUTY CLERK

CIRCUIT COURT JUDGE

EDWARD A. GARRISON

GM 01228

EXHIBIT Z

 Date: 4/25/16 ROYAL PALM BEACH POLICE DEPARTMENT Page: 1
 Time: 8:51:59 Offense Report Program: CMS301L

Day Of Week : Friday Report Date : 8/03/01 23:43
 Occur From Date: 8/03/01 20:00 Occur To Date : 8/03/01 23:42
 Dept Class : THEFT/LARCENY
 Street Number : HIDDEN HARBOR, [REDACTED]
 City : ROYAL PALM BEACH, FL 33411
 Zone/division : Zone Two (2) (So of Okee/E thr Wil)
 Location Type : APARTMENT/CONDO Case Status : OPEN / NOT ACTIVE
 Report Officer : LLEWELLYN, CRAIG Supervisory Emp: MURPHY, THOMAS 8/06/01
 Case Status Dt : 8/03/01

***** C A S E M A N A G E M E N T I N F O R M A T I O N *****
 Case Number : 1-01-003008 Dept Class : THEFT/LARCENY
 Case Status : OPEN / NOT ACTIVE Case Status Dt : 8/03/01

***** O F F E N S E R E P O R T # 1 *****
 State Class : Larceny - From Building
 Attmpt/Committ : Committed Statute/Ordin : 812.014(2C1)

***** P R O P E R T Y I N F O R M A T I O N # 1 *****
 Category : STOLEN UCR Prop Type : CURRENCY, NOTE, ETC.
 Quantity : 5 Description : US CURRENCY
 Value : 500.00 Property type : CURRENCY/NEGOTIABLE

***** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 1 **
 Case Number : 1-01-003008 Prompt valid in: UNKNOWN,
 City : ROYAL PALM BEACH, FL 33411
 Home Phone No. : 561/000-0000 Business Phone : 561/000-0000
 Race : Unknown Sex : Unknown
 Ethnic Origin : Hispanic

***** V I C T I M I N F O R M A T I O N - # 1 *****
 Case Number : 1-01-003008 Prompt valid in: ROBERTS, VIRGINIA L
 Street Number : [REDACTED]
 City : ROYAL PALM BEACH, FL 33411
 County : PALM BEACH
 Business Phone : 561/714-5252
 Birth Country : Unknown
 Race : White
 Ethnic Origin : WHITE
 Weight : 103
 Victim Type : Juvenile

***** O T H E R P E R S O N I N F O R M A T I O N - # 1 *****
 Case Number : 1-01-003008 Last Name : FIGUEROA, ANTHONY L
 Person Type : OTHER PERSON
 Street Number : [REDACTED]
 City : ROYAL PALM BEACH, FL 33411
 County : PALM BEACH
 Business Phone : 561/000-0000
 Birth Country : Unknown
 Race : White
 Ethnic Origin : WHITE
 Oper Lic Cntry : Unknown
 Sex : Male
 Juvenile : ADULT

***** O T H E R P E R S O N I N F O R M A T I O N - # 2 *****
 Case Number : 1-01-003008 Last Name : SWITZER, KYLE M

CERTIFIED
 TO BE A TRUE COPY
 RIC L. BRADSHAW, SHERIFF
 GM_00777

Date: 4/25/16
Time: 8:51:59

ROYAL PALM BEACH POLICE DEPARTMENT
Offense Report

Page: 2
Program: CMS301L

1-01-003008 (Continued)

Person Type : OTHER PERSON
Street Number : [REDACTED]
City : ROYAL PALM BEACH, FL 33411
County : PALM BEACH
Birth Date : [REDACTED] Birth Country : Unknown
Oper Lic No. : [REDACTED] FL United States
Race : White Sex : Male
Ethnic Origin : WHITE

***** OTHER PERSON INFORMATION - # 3 *****
Case Number : 1-01-003008 Last Name : RIGEL, DUSTIN
Person Type : OTHER PERSON
Street Number : [REDACTED]
City : LOXAHATCHEE, FL 33470
County : PALM BEACH
Business Phone : 561/000-0000
Birth Country : Unknown Oper Lic Cntry : Unknown
Race : White Sex : Male
Ethnic Origin : WHITE

***** OTHER PERSON INFORMATION - # 4 *****
Case Number : 1-01-003008 Last Name : JEFFERSON, CRAIG
Person Type : [REDACTED]
Street Number : [REDACTED]
City : [REDACTED]
County : [REDACTED]
Business Phone : [REDACTED]
Birth Country : [REDACTED]
Race : [REDACTED]
Ethnic Origin : [REDACTED]

***** OTHER PERSON INFORMATION - # 5 *****
Case Number : 1-01-003008 Last Name : URVIS, SCOTT
Person Type : [REDACTED]
Street Number : [REDACTED]
City : [REDACTED]
County : [REDACTED]
Business Phone : [REDACTED]
Birth Country : [REDACTED]
Race : [REDACTED]
Ethnic Origin : [REDACTED]

***** OTHER PERSON INFORMATION - # 6 *****
Case Number : 1-01-003008 Last Name : RISDEN, RICHARD ARTHUR
Person Type : OTHER PERSON
Street Number : [REDACTED]
City : ROYAL PALM BEACH, FL 33411
County : PALM BEACH Home Phone No. : [REDACTED]
Business Phone : 561/000-0000 Birth Date : [REDACTED]
Birth Country : Unknown
Oper Lic No. : [REDACTED] FL United States
Race : White Sex : Male

CERTIFIED
TO BE A TRUE COPY
RIC L. BRADSHAW, SHERIFF
GM_00778

Date: 4/25/16
Time: 8:51:59

ROYAL PALM BEACH POLICE DEPARTMENT
Offense Report

Page: 3
Program: CMS301L

Ethnic Origin : WHITE
Weight . . . : 160

1-01-003008 (Continued)
Height . . . : 511

***** N A R R A T I V E # 1 *****
Original Report Reported By: LLEWELLYN, CRAIG R. 8/03/01
Entered By: JARRETT, DAWN M. 8/16/01

ON 080301 AT 2343 HOURS I WAS DISPATCHED TO [REDACTED] IN REFERENCE TO A SUSPICIOUS INCIDENT. UPON ARRIVAL I MADE CONTACT WITH VIRGINIA ROBERTS AND ANTHONY FIGUEROA THE RESIDENTS OF [REDACTED]. V. ROBERTS STATED THAT EARLIER IN THE EVENING SHE HAD SEVERAL PEOPLE VISITING HER AND A. FIGUEROA. V. ROBERTS STATED THAT WHILE THE PEOPLE WERE IN HER APARTMENT, ONE OF THEM WENT INTO HER BEDROOM AND REMOVED \$500.00 CASH FROM HER WALLET. V. ROBERTS STATED THAT SHE DOES NOT KNOW WHICH OF HER VISITORS TOOK THE MONEY. A. FIGUEROA STATED THAT V. ROBERTS WALLET WAS LOCATED IN A POCKET OF A SHIRT WHICH WAS INSIDE THE CLOSET OF THE MASTER BEDROOM. A. FIGUEROA STATED THAT HE SPOKE TO ALL OF THE VISITORS ABOUT THE MISSING MONEY, AND THAT NO ONE ADMITTED TO TAKING IT. V. ROBERTS AND A. FIGUEROA STATED THAT SEVERAL OF THE VISITORS HAD ALREADY LEFT PRIOR TO MY ARRIVAL, AND THAT THEY COULD NOT PROVIDE NAME OR CONTACT INFORMATION FOR THOSE THAT ALREADY LEFT.

I THEN MADE CONTACT WITH THE REMAINING VISITORS RICHARD RISDEN, SCOTT ORVIS, CRAIG JEFFERSON, DUSTIN RIGEL, AND KYLE SWITZER, A RESIDENT OF [REDACTED]. ALL INDIVIDUALS STATED THAT THEY WERE NOT RESPONSIBLE FOR TAKING THE MONEY NOR DID ANY OF THEM KNOW WHO TOOK IT.

I TOOK THE NECESSARY INFORMATION FROM V. ROBERTS AND A. FIGUEROA AND PROVIDED ME WITH A VICTIM'S RIGHTS SHEET THAT CONTAINED A CASE NUMBER. NO FURTHER SUSPECT INFORMATION AT TIME OF REPORT.

***** END OF REPORT *****

CERTIFIED
TO BE A TRUE COPY
RIC L. BRADSHAW, SHERIFF

GM_00779

EXHIBIT AA

PALM BEACH COUNTY SHERIFF'S OFFICE PAGE 1
CASE NO. 02075321 OFFENSE REPORT CASE NO. 02075321

DISPOSITION: ZULU
DIVISION: ROAD PATROL

CIVIL MATTER * * *
SIGNAL CODE: 66 CRIME CODE: NON CRIME CODE: CC CODE: 9566 06/02/02 SUNDAY
ZONE: A81 GRID: 3C21 DEPUTY I.D.: 6933 NAME: WIKSE JOHN ASSIST: TIME D 2148 A 2159 C 2249
OCCURRED BETWEEN DATE: 06/02/02 , 2148 HOURS AND DATE: , 0000 HOURS
EXCEPTION TYPE:
INCIDENT LOCATION: 13475 N 24 CT APT. NO.:
CITY: LOXAHATCHEE STATE: FL ZIP: 33470
NO. OFFENSES: 00 NO. OFFENDERS: 00 NO. VEHICLES STOLEN: 0 NO. PREMISES ENTERED: 0
LOCATION:
NO. VICTIMS: 00 NO. ARRESTED: 0 FORCED ENTRY: 0

NAME LIST:

ROLE:

OTHER

PHILLIP E RATCLIFFE

SEX: M RACE: W HT: 509 WT: 165 HR

OTHER

LORRI M DEPASQUA

SEX: F RACE: W HT: 504 WT: 120 HR

OTHER

VIRGINIA L ROBERTS

SEX: F RACE: W HT: 504 WT: 108 HR

RESIDENTIAL ADDRESS: 155 SANTIAGO ST

BUSINESS PHONE: 561 000-0000

COMPLAINANT

ANTHONY L FIGUEROA

ON JUNE 2, 2002 AT 2148 HOURS, I WAS DISPATCHED TO 13475 24TH COURT,
NORTH, LOXAHATCHEE, FLORIDA IN REFERENCE TO A REPORT OF A CIVIL DISPUTE.
UPON ARRIVAL, I MET WITH WHITE FEMALE, VIRGINIA L. ROBERTS, DATE OF BIRTH
AND WHITE MALE, ANTHONY L. FIGUEROA, DATE OF BIRTH , WHO WERE
STANDING AT THE END OF THE DRIVEWAY ACCESS TO THE PROPERTY.
THERE WAS A PILE OF PERSONAL EFFECTS (I.E. A LAMP, CLOTHING AND OTHER

printed by Employee Id #: 8557 on April 22, 2016 03:09:29PM

CERTIFIED
TO BE A TRUE COPY
MICHAEL BRADSHAW, SHERIFF

GM_00748

PALM BEACH COUNTY SHERIFF'S OFFICE PAGE 2
CASE NO. 02075321 OFFENSE REPORT CASE NO. 02075321
DISPOSITION: ZULU

MISCELLANEOUS ITEMS) NEXT TO THEM.

VIRGINIA EXPLAINED THAT THEY HAD BEEN LIVING AT THE RESIDENCE FOR APPROXIMATELY FOUR MONTHS AND THAT THEY HAD MADE AN AGREEMENT WITH THE LANDLORD TO VACANT THE PROPERTY AS OF 060102. SHE CONCLUDED BY STATING THEY HAD TRANSPORTED ONE LOADED OF THEIR BELONGINGS AND HAD RETURNED FOR THE REMAINING ITEMS WHEN THEY FOUND THEM AT THE END OF THE DRIVEWAY IN DAMAGE CONDITION. ADDITIONALLY, THEY HAD LEFT A MATTRESS THAT WAS NOW BURNING ON THE PROPERTY.

I WENT OUT TO THE PROPERTY AND MADE CONTACT WITH THE LANDLORD, A WHITE MALE, PHILLIP E. RADCLIFFE, III, DATE OF BIRTH [REDACTED]. PHILLIP STATED THAT PRIOR TO LEAVING, ANTHONY AND VIRGINIA MADE STATEMENTS SUCH AS "YOU CAN KEEP THE REST YOU BASTARD!" THIS STATEMENT AS WELL AS OTHERS WERE WITNESS BY WHITE FEMALE, LORRI M. DESPAQUA, DATE OF BIRTH [REDACTED]. PHILLIP STATED THAT THERE WAS A SUBSTANTIAL AMOUNT OF TIME SINCE THEIR DEPARTURE FROM PHILLIP. HE FELT THAT THEY HAD DISCARDED THE ITEMS SO HE PLACED THEM OUT FOR TRASH PICKUP. HE ALSO STATED THAT THE MATTRESS WAS COVERED IN CAT URINE SO HE BURNED IT FOR SANITARY PURPOSES.

ALL PARTIES WERE ADVISED THAT AN INFORMATION REPORT WILL BE COMPLETED IN REGARD TO THE INCIDENT AND EXPLANATION OF CIVIL REMEDIES WERE GIVEN.

IT SHOULD NE NOTED THAT VIRGINIA PRIOR TO LEAVING ADVISED ME THAT SHE WOULD PROVIDE ME WITH A LIST OF DAMAGE AND/OR RUIN ITEMS AS SOON AS POSSIBLE.
D/S J. WIKSE/ID 6933/TRANS: 060502/BH
DICT: 060302/1418 HRS.

printed by Employee Id #: 8557 on April 22, 2016 03:09:29PM

CERTIFIED
TO BE A TRUE COPY
RIC L. BRADSHAW, SHERIFF

GM_00749

EXHIBIT BB

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Category	Count
10/15/95										
17	G1159B	N908JE	CMA	PBI		779	JE		2	0
20	"	"	PBI	TEB		780	JE, AS		2	2
21	"	"	TEB	PBI		781	JE, AS, EVA/CLEWY BARRY, 1 Female		2	4
26	"	"	PBI	TEB		782	GM, MONT GRIFFIN, AS, ALAN GREENBERG, MRS. JACOBSON, EVA, GLENN BARRY, MARY		2	4
29	"	"	TEB	CMA		783	JE, SOPHIE BIDDLE, 3 Males		1	3
30	"	"	CMA	PBI		784	JE, SOPHIE BIDDLE	1/1	2	0
Dec 3	"	"	PBI	TEB		785	JE, SOPHIE BIDDLE		2	2
5	"	"	TEB	PBI		786	JE, AS		2	3
14/96	"	"	PBI	TEB		787	JE GM, GWYNETH BEECH, GLENN STANLEY, DAVID ANTON		2	1
4	"	"	TEB	PBI		788	JE, SOPHIE BIDDLE		2	5
9	"	"	PBI	TEB		789	JE, AS, SOPHIE BIDDLE		2	3
12	"	"	TEB	PBI		790	JE, GM, DEBORAH		2	3
20	"	"	PBI	SAF		795	JE, GM	CONFIDENTIAL DR 000001	1/1	4
21	"	"	SAF	LAX		796	JE, GM	1/1	2	0
23	"	"	LAX	TEB		797	JE		4	4
25	"	"	TEB	PBI		798	JE		2	3
28	"	"	PBI	CMA		799	JE, GM	1/1	2	0
28	"	"	CMA	TEB		800	JE, GM		1	0
31	"	"	TEB	PBI		801	JE		2	3
I certify that the statements made by me on this form are true.							Page Total	4/4	44	2
Pilot's Signature: <i>David Rodriguez</i>							Amount Forward	5822/5543	6558	6
							Total to Date	5822/5543	6602	8

DEPOSITION
EXHIBIT
6-3-16
KAW
PENGAD 800-631-6989

Date 19	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					AIRPLANE		
16 FEB	G1154B	N908JE	PBI	TNCM		802	JE, GM	1/1	2	4	
7	G1154B	"	TNCM	TEB		803	JE, GM	1/1	4	0	
9	"	"	TEB	PBI		804	JE, GM, SHARON REYNOLDS		2	1	
12	"	"	PBI	TEB		805	JE, GM, SHARON REYNOLDS	1/1	2	1	
15	"	"	TEB	BCT		806	JIMMY CAYNE, MRS. CAYNE, BUNSON, GARY, WILSON, RALPH, DEWEY, SORRIS, BROWN, JIM		2	4	
19	"	"	BCT	TEB		807	JIMMY CAYNE, MRS. CAYNE, BUNSON, GARY, WILSON, RALPH, DEWEY, SORRIS, BROWN, JIM	1/1	2	3	
28 MAR	"	"	TEB	PBI		808	JE, GM, AS, SORRIS, BIDDLE		2	2	
4	"	"	PBI	TEB		809	JE, GM, AS, SORRIS, BIDDLE, MAREP		2	4	
8	"	"	TEB	PBI		810	JE, GM, AS, DIEHL, NEAL, 1 FEMALE	1/1	2	6	
11	"	"	PBI	TEB		811	JE, GM, AS, CHRISTENSEN, 1 FEMALE		2	3	
15	"	"	TEB	PBI		812	JE, GM, AS, 1 FEMALE		2	1	
18	"	"	PBI	CMH		813	JE, GM, AS, CLARE, WAZER, 1 FEMALE	1/1	2	1	
18	"	"	CMH	TEB		814	JE, GM, AS	CONFIDENTIAL DR 000002			
22	"	"	TEB	PBI		815	JE, FRANCES, SORRIS, BIDDLE, EVA, & 4 PA		2	3	
24	"	"	PBI	TEB		816	JE, EVA, PABY, & 3 PA		2	3	
26	"	"	TEB	VNY		817	JE		5	5	
29 APR	"	"	VNY	SAF		818	JE		1	5	
8	"	"	PBI	TEB		821	JE, GM, AS, EVA, GLENN, CLENN, WAZER, 1 FEMALE		2	1	
15 APR	G1154B	N908JE	PBI	TEB			ENDORSEMENT COMPLETION RENE		10	0	
							Page Total	6/4	53	8	
							Amount Forward	538	6547	6602	8
							Total to Date	538	6547	6656	6

I certify that the statements made by me on this form are true.

Pilot's Signature: *David Rodriguez*

...and C1a
SEL

Date to 10/91	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From To					
22 APR	81159B	N908JE	PBI TCB		829	JE, GM	1/1	22
26	"	"	TCB PBI		829	JE, GM, 3 PAX	1/1	23
29	"	"	TCB TCB		830	JE, CM, MASS, 1 male, 2 female	1/1	23
30	"	"	TCB EIPW		831	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	60
3	"	"	TCB EIPW		832	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	5
3	"	"	TCB EIPW		833	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	13
6	"	"	TCB EIPW		834	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	7
6	"	"	TCB EIPW		835	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	18
6	"	"	TCB EIPW		836	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	65
8	"	"	TCB EIPW		837	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	33
9	"	"	TCB EIPW		838	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	7
9	"	"	TCB EIPW		839	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	15
13	"	"	TCB EIPW		840	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	CONFIDENTIAL DR_000003
13	"	"	TCB EIPW		841	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	11
17	"	"	TCB EIPW		842	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	21
20	"	"	TCB EIPW		843	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	22
22	"	"	TCB EIPW		844	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	40
24	"	"	TCB EIPW		845	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	31
27	"	"	TCB EIPW		846	JE, EIPW, 1 male, 1 female, 1 child, 1 dog, 1 cat, 1 bird, 1 fish, 1 insect, 1 plant, 1 mineral, 1 fossil, 1 artifact, 1 relic, 1 monument, 1 landmark, 1 site, 1 area, 1 region, 1 country, 1 continent, 1 world, 1 universe	1/1	23
<p>Page Total</p> <p>Amount Forward</p> <p>Total to Date</p>							<p>14/10</p> <p>5832/501</p> <p>5832/501</p>	<p>460</p> <p>6666</p> <p>67026</p>

I certify that the statements made by me on this form are true.

Pilot's Signature: David Dodge

2116
211

Date of Flight	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	...and Class
			From To						
30 JUN	G1159B	N908JC	TEB TEB		847	JE		20	SEL MEL
2	"	"	PBI TEB		848	JE PAULA CLASBY, ALISSON, SHARCEE TECANY	1/1	25	2
5	"	"	TEB PBI		849	JE, ALISSON, CHARICE, CECILIA	1/1	23	2
18	"	"	PBI TEB		850	NO PASSENGERS JEM WARRON	1/1	22	2
19	"	"	TEB PBI		851	JE, GM		21	2
24-27	"	SEMULATOR	SAV SAV		860	RECURRENT TRAINING		60	2
9 JUL	"	N908JC	SAC CMH		861	JE, GM	1/1	25	6
10	"	"	CMH TEB		862	JE, GM, IRA ZICHARMAN	1/1	12	2
12	"	"	TEB MVY		863	JE	1/1	6	1
12	"	"	MVY TEB		864	JE, GM		9	
12	"	"	TEB PBI		865	JE, GM		24	
15	"	"	PBI TEB		866	JE, GM	1/1	23	2
16	"	"	TEB PBI		867	OPS 1 INSPECTION		20	2
17	"	"	SAV SAV		868	OPS 1 INSPECTION	1/1	9	
18	"	"	SAV GWR		869	OPS 1 INSPECTION	1/1	17	1
19	"	"	PBI TEB		870	JE, GM, ANDY, MANDY, RAUPH	1/1	23	2
14	"	"	TEB TVC		871	JE, GM	1/1	15	1
16	"	"	TVC TEB		872	JE, GM	1/1	14	1
18	"	"	TEB MVY		873	JE, DAVID ROYMAN, TELLER, TAYLOR 2 PAX	1/1	6	
certify that the statements made by me on this form are true.							Page Total Amount Forward Total to Date	13/12 375 6702.6 6710.1	2116 2116


Pilot's Signature *David Rodriguez*

CONFIDENTIAL DR 000004

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	...and Class
18	G1159B	N908JE	MVY TEB		877	JE, PAVAR ROTIMAN, CELINA MIDDLEARS	1/1	ARRANG	SEL
18	"	"	TEB PBI		878	JE, CELINA MIDDLEARS	1/1	2	
21	"	"	PBI JAN		879	JE, GM, ROSEN PLANT	1/1	1	
21	"	"	JAN SAF		880	JE, GM, ROSEN PLANT	1/1	1	
21	"	"	SAF PBI		881	JE, GM, ROSEN PLANT	1/1	3	
26	"	"	PBI TEB		882	JE, GM	1/1	2	
26	"	"	TEB BED		883	JE	1/1	6	
26	"	"	BED PVD		884	JE	1/1	3	
27	"	"	PVD CMH		885	JE	1/1	1	
27	"	"	CMH DCA		886	JE, 1 MAGE, 1 GEMBLE	1/1	7	
28	"	"	DCA CMH		887	JE, STAN GLENN, ALAN DERSHOWITZ	1/1	8	
28	"	"	CMH TEB		888	JE, ALAN DERSHOWITZ	1/1	CONFIDENTIAL DR_000005	
28	"	"	TEB BOS		889	ALAN DERSHOWITZ	1/1	8	
29	"	"	BOS TEB		890	RETURN TO TEB	1/1	2	
12	"	"	TEB PBI		891	JE, CELINA MIDDLEARS	1/1	2	
18	"	"	PBI TEB		892	JE, GM	1/1	2	
20	"	"	TEB PBI		893	JE, GM	1/1	2	
23	"	"	PBI BED		894	JE, GM	1/1	2	
23	"	"	BED TEB		895	JE, GM	1/1	6	
<div style="display: flex; justify-content: space-between;"> <div> <p>Page Total</p> <p>Amount Forward</p> <p>Total to Date</p> </div> <div> <p>16/15</p> <p>5850/5103</p> <p>5850/5103</p> </div> <div> <p>286</p> <p>6140</p> <p>6163</p> </div> </div>							2116	2116	

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodriguez

Date, 1946 SC	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To					
26	G1159B	N908JE	TEB	CMH	896		JE	1/1	1 2
26	"	"	CMH	PBI	897		JE		1 9
26	"	"	PBI	TEB	901		JE, GM, DIDIER	1/1	2 4
10	"	"	TEB	PBI	902		JE		2 5
14	"	"	PBI	TEB	903		JE, 1 FEMALE	1/1	2 4
15	"	"	TEB	CMH	904		TO CMH FOR PICK-UP	1/1	1 2
15	"	"	CMH	TEB	905		JE, DARREN IRA ZICKERMAN, JEFF SCHWARTZ	1/1	1 2
19	"	"	TEB	PBI	906		JE, DIDIER CAZABUONNE	1/1	2 3
22	"	"	PBI	TEB	907		JE, GM, DIDIER CAZABUONNE	1/1	2 3
24	"	"	TEB	SAF	908		JE, GM, LARRY		4 1
25	"	"	SAF	PBI	909		JE, GM, SHANNON		2 4
27	"	"	PBI	TEB	910		JE, GM, JOE PASBOW, SHARON	1/1	2 4
30	"	"	TEB	DCA	911		JE ANDY STEWART, LESLIE GEBB, BRANDY MORTIMER, LESLIE GEBB, STEPHEN ROBERT	1/1	6
30	"	"	DCA	TEB	912		JE ANDY STEWART, LESLIE GEBB, SHARON	1/1	6
31	"	"	TEB	PBI	913		JE, GM, DIDIER CAZABUONNE		2 2
Nov 4	"	"	PBI	TEB	914		JE, GM, DIDIER CAZABUONNE	1/1	2 5
7	"	"	TEB	PBI	915		JE, JONATHAN, JEFF SCHWARTZ, JEFF SCHWARTZ (G), ZUB, CLEM, STEVE, NANNY, LARRY, LARRY		2 2
11	"	"	PBI	TEB	916		JE, JONATHAN, JEFF SCHWARTZ, JEFF SCHWARTZ (G), ZUB, CLEM, STEVE, NANNY, LARRY, LARRY		2 2
15	"	"	TEB	CMH	917		JE, GM, JEFF SCHWARTZ, DARREN ROSS, LARRY		1 3
I certify that the statements made by me on this form are true.									
<div style="text-align: right;">  David Rodriguez Pilot's Signature </div>									
<div style="text-align: right;"> Pages Total: 11/9 Amount Forward: 5875/5838 Total to Date: 5886/6807 </div>									

CONFIDENTIAL DR_000006

2116
2116

David Lodge

Pilot's Signature _____

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
1917			From To					
21	GII	N908JE	PBI TCB		937	JE, GM, KAREN		2 2
24	"	"	TCB TKM		938	JE, GM, CLAUDE HAZEL, AMANDA	1/1	3 4
25	"	"	TNCM PBI		939	JE, GM, CLAUDE HAZEL, AMANDA	1/1	2 0
29	"	"	PBI TCB		940	JE, GM, Gwendolyn Beck	1/1	2 1
30	"	"	TCB PBI		941	JE, CLAUDE HAZEL, CLAUDE HAZEL, AMANDA		2 4
1918	"	"	PBI TCB		942	JE, CLAUDE HAZEL, CLAUDE HAZEL, AMANDA		2 2
2	"	"	TCB SAV		943	JE, CLAUDE HAZEL, CLAUDE HAZEL, AMANDA		1 7
13	"	"	SAV TCB		944	NO PASSENGERS	1/1	1 5
13	"	"	TCB PBI		945	JE, CLAUDE HAZEL, CLAUDE HAZEL, AMANDA		2 3
17	"	"	PBI TCB		946	JE, CLAUDE HAZEL, CLAUDE HAZEL, AMANDA	1/1	2 2
21	"	"	TCB PBI		947	JE, CLAUDE HAZEL, CLAUDE HAZEL, AMANDA		CONFIDENTIAL DR 000008
23	"	"	PBI TCB		948	JE, CLAUDE HAZEL, CLAUDE HAZEL, AMANDA	1/1	2 2
25	"	"	TCB PBI		949	JE, CLAUDE HAZEL, CLAUDE HAZEL, AMANDA	1/1	3 6
1	"	"	PBI SAF		950	JE, GM	1/1	2 2
2	"	"	SAF SJC		951	JE, GM	1/1	3 6
3	"	"	SJC TCB		952	JE, GM	1/1	2 2
8	"	"	TCB PBI		953	JE, GM, CLAUDE HAZEL	1/1	4 3
10	"	"	PBI CMH		954	JE, CLAUDE HAZEL	1/1	2 2
10	"	"	CMH VNC		955	JE, PAMELA STEVENS	1/1	2 0
I certify that the statements made by me on this form are true.							Page Total	16/7
Pilot's Signature David Rodriguez							Amount Forward	5899
							Total to Date	5899
								6841
								6887

2.116
2.116

Date to 17 MAR	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ATIS	PLD	
10	G-11590	N908JE	VNC	PBI		956	JE			4	
15	"	"	PBI	DCA		957	JE, CELINA MIDELEARS	1/1		1	
15	"	"	DCA	IAD		958	REPASSTON FOR GREEN			2	
15	"	"	IAD	PBI		959	JE, CELINA MIDELEARS			2	
24	"	"	PBI	TEB		960	JE, GM, JUANNA JOEL PASSTON	1/1		2	
27	"	"	TEB	PBI		961	JE, GM, DIEDER CAZADORUMER			2	
30	"	"	PBI	SAT		962	JE, GM, PIEDER CAZADORUMER			3	
APR	"	"	SAT	CMH		963	JE, GM, DC	1/1		2	
2	"	"	CMH	TEB		964	JE, GM, DC			1	
10	"	"	TEB	PBI		965	JE, DC, PAMPA, 2 FEMALE, 1 MALE			2	
15	"	"	PBI	DCA		966	JE, GM, DC, MANDY, GUESSON BUCKY DEEDER, PIEDER BUCK	1/1	CONFIDENTIAL DR_000009	2	
15	"	"	DCA	TEB		967	JE, DC, GUESSON BUCKY, LANN			2	
17	"	"	TEB	PBI		968	JE, GM, DC, GUESSON BUCKY, PIEDER BUCK	1/1		2	
21	"	"	PBI	TEB		969	JE, DC, MANDY, LISA, 1 MALE	1/1		2	
21	"	"	TEB	BGO		970	JE	1/1		5	
21	"	"	BGO	TEB		971	JE			7	
22	"	"	TEB	PBI		972	JE			2	
27	"	"	PBI	TEB		973	JE, CELINA MIDELEARS	1/1		2	
MAR	"	"	TEB	EGGW		974	JE, GM	1/1		6	
							Pago Total	9/9	378		
							Amount Forward	5109	6887	2	
							Total to Date	5118	69250		

I certify that the statements made by me on this form are true.

David Rodge
Pilot's Signature

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Date to May	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To					
5	G1159B	N908JE	EGGW	LSGG		975	JE	1/1	13
5	"	"	LSGG	LFPB		976	JE	1/1	7
6	"	"	LFPB	CYJT		977	JE, GM	1/1	56
6	"	"	CYJT	TEB		978	JE, GM	1/1	22
9	"	"	TEB	SAF		979	JE, GM, NADIA		39
12	"	"	SAF	VNY		980	JE	1/1	15
14	"	"	VNY	SAF		981	JE, SOPHIE BIDDLE	1/1	15
15	"	"	SAF	DFW		982	JE, GM, SOPHIE BIDDLE, JACK ROBERTSON	1/1	12
15	"	"	DFW	PBI		983	JE, SOPHIE BIDDLE	1/1	70
23	"	"	PBI	JFK		984	REPOSITION TO JFK		22
24	"	"	JFK	PBI		985	JE, LYNNA MIDDLEBROS, GINGER SOUTHWORTH	1/1	CONFIDENTIAL DR 000010
24	"	"	PBI	TEB		986	JE, MANNY	1/1	21
24	"	"	TEB	PBI		987	JE, GM, DIORIER		24
24	"	"	PBI	TEB		988	JE, GM	1/1	23
21	"	"	TEB	MVY		989	JE, LYNN FORESTER, HEATHER MANN, RUSS HARRIS	1/1	6
21	"	"	MVY	PBI		990	JE, HEATHER MANN		24
23	"	"	PBI	CMH		991	JE, HEATHER	1/1	21
23	"	"	CMH	TEB		992	JE,		11
27	"	"	TEB	PBI		993	JE, GM		21
Paygo Total Amount Forward Total to Date									13/13 5918 5671 5684

I certify that the statements made by me on this form are true.

 David Rodriguez
 Pilot's Signature
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Date 19 47	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		and Class
			From	To					APB/DANE		
JUL 1	G1159B	N908JE	PBI	TEB		994	JG, GM, PAULA EPSTEIN	1/1	2	5	SEL
10	"	"	CMH	SAF		999	JG, GM, PAULA EPSTEIN	1/1	3	0	
16	"	"	PBISAF	PBI		1000	JG, GM, PAULA EPSTEIN		3	2	
22	"	SMULACRE	DFW	HOU			SMULACRE - STEEP TURN, VSO, VSI, SET UPSET (WAKE TURBULENCE)		3	0	
23	"	"	TEB	HON			WINGS - OPERATIONS ALL-CHARGE, STEADY ENGINE, RTO		3	0	
24	"	"	DFW	COS			WING - OPERATIONS ALL-CHARGE, STEADY ENGINE, RTO		3	0	
13	C-421B	N908GM	ZOR-SAF-ZOR			57	4 TAKE OFF + LANDING	4/4	7		
15	"	"	ZOR	SAF		58		1/1	2		
15	"	"	SAF	ZOR		59	KRESTY RODGERS	1/1	4		
9	G1159B	N908JE	PBI	TVC		1012	JG, GM	1/1	2	7	
10	"	"	TVC	TEB		1013	JG, GM	1/1	2	7	
13	"	"	TEB	PBI		1014	JG, GM	1/1	2	7	
17	"	"	PBI	MVY		1015	JG, HEATHER MANN	1/1	2	5	
17	"	"	MVY	TEB		1016	JG, HEATHER MANN	1/1	2	5	
20	"	"	TEB	SAF		1017	JG, CELINA, GEM, GVA, CELINA MIDELFART, PETER	1/1	3	9	
23	"	"	SAF	TEB		1018	JG, CELINA, GEM, GVA, CELINA MIDELFART, PETER	1/1	3	5	
24	"	"	TEB	FOK		1019	REPESITION	1/1	5		
24	"	"	FOK	MVY		1020	JG, CELINA MIDELFART	1/1	4		
25	"	"	MVY	PBI		1021	JG, CELINA MIDELFART	1/1	2	6	
I certify that the statements made by me on this form are true.							Page Total	15/14	39	6	
Pilot's Signature							Amount Forward	5931	69	4	3
							Total to Date	5946	70	9	9
								2116	5		
								2116	5		

CONFIDENTIAL DR_000011

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From To					
1847 SEP	G1159B	N908JE	PBI TEB		1022	JG, HEATHER MANN	1/1	2 6
2	"	"	TEB CMH		1023	RECEIVED	1/1	1 2
3	"	"	CMH TEB		1024	STEVE & JIM TUCKERMAN	1/1	1 2
3	"	"	TEB LFPB		1025	JG, JACK ROBERTSON STEVE & JIM TUCKERMAN	1/1	6 6
6	"	"	LFPB LFMN		1026	JG, GUN, JOHN & ANNIE GLENN MANN	1/1	1 3
7	"	"	LFMN EGGW		1027	NEWS, FLIGHT BY TUCKERMAN, GLENN MANN	1/1	1 6
12	"	"	EGGW CYJT		1028	JG, GUN		5 5
13	"	"	CYJT PBI		1029	JG, GUN		4 3
15	"	"	PBI TEB		1030	JG, GUN	1/1	2 3
19	"	"	TEB CMH		1031	JG, HEATHER MANN, DIPPER	1/1	1 2
20	"	"	CMH PBI		1032	JG, HEATHER MANN, DIPPER	CONFIDENTIAL	DR 0000 12
22	"	"	PBI SAF		1033	JG, GUN, DIPPER, CLARE HAZEL	1/1	3 6
26	"	"	SAF TEB		1034	JG, GUN, DIPPER, DOG SWITZER, AUGUSTO PLENO, JACK ROBERTSON, PASCAL	1/1	3 5
28	"	"	TEB PBI		1035	JG, GABRIELLE		2 4
18	G-III	N883A	SAV SAV			TEST FLIGHTS GUN MANN, MANN, JACK, STEVE, ANN, SYSTEMS CHECK	1/1	2 0
26	CESSNA 441	N908GM	ZOLR-SAF-ABQ-70L			GET RECONSTRUCTION ROAD, T.S. APPROACH, BONE APPROACH	4/4	1 9
4	G1159B	N908JE	PBI STL		1036	RECONSTRUCTION	1/1	2 2
4	"	"	STL PBI		1037	JG, GUN		2 2
12	"	"	PBI TEB		1038	JG, HEATHER MANN	1/1	2 9
I certify that the statements made by me on this form are true.								
Pilot's Signature <i>David Rodage</i>							PAGE Total	16/13
							Amount Forward	5446
							Total to Date	5446
								7003 9
								7054 3

2116

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Date 19	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To					
17 OCT	G1159B	N908JE	TEB	PBI		1039	JE, GM, LADDER, EMMY, REDEGGY TEBABLE		25
21	"	"	PBI	TEB		1040	JE, GM, MANDY GMMY, PDIJER	1/1	22
24	CESNA 441	N908GM	ZORRO	SAF 2000		51	CURRENT REQUIREMENT	4/4	
24	"	"	TEB	BED		1041	JE, EMMY	1/1	7
24	"	"	BED	PBI		1042	JE, EMMY	1/1	26
27	"	"	PBI	TEB		1043	JE, GM, EMMY TAYLER	1/1	21
31 NOV	"	"	TEB	PBI		1044	JE, GM, ET, CLEM, EVA, CLENA, JOSEPH DUBBY, NANNY	1/1	24
2	"	"	PBI	SAF		1045	JE, GM, ET, I REMPLE		38
4	"	"	SAF	TEB		1046	JE, GM, ET, GARY + MARY KERNY	1/1	34
7	"	"	TEB	JAX		1047	JE, LYNN FORESTER	1/1	19
7	"	"	JAX	PBI		1048	JE	1/1	7
8	C-421	N908GM	PBI	MIA		70	LARRY VISOSKE	100% CONFIDENTIAL DR_000013	
24	G1159B	N908JE	PBI	TEB		1049	REPOSITION TO TEB	1/1	23
24	"	"	TEB	SAF		1050	JE, ET	1/1	39
25	"	"	SAF	PBI		1051	JE, ET	1/1	30
29 DEC	"	"	PBI	TEB		1052	JE, PDIJER, CLENA, MARY KERNY, JOE PAGANO, GENE		22
9	"	"	TEB	PBI		1053	JE, GM, ET		22
9	"	"	PBI	TEB		1054	JE, GM, ET	1/1	22
11	"	"	TEB	PBI		1055	JE, EVA, CLENA, JOSEPH DUBBY + NANNY	1/1	25

I certify that the statements made by me on this form are true.

Pilot's Signature: *David Rodriguez*

Page Total	13
Amount Forward	5962
Total to Date	5975

CONFIDENTIAL DR_000014

Date 1947 DEC	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To					
14	G1159B	N908JE	PBI	TEB		1032	JE, GEM, GVA, CEMINA, JOK DAN DUBBY NANNY, 2 FEMALE	1/1	Airplane
17	"	"	TEB	BCT		1051	JE, MANDY, ELLISON, GUNDELIN, BUCK WARREN, SPENCER, JENNY + MRS COYNE, ET		2 5
17	"	"	BCT	PBI		1053	JE, MANDY, ELLISON, GUNDELIN, BUCK JENNY, TYLER		1
JBW3	"	"	PBI	TEB		1054	JE, GEM, ET, GLEN DUBBY, GEMMY + MRS COYNE WARREN, WHITTET, MARGARET WHESTER	1/1	2 3
8	"	"	TEB	SAF		1066	JE, GEM, ET, DOUG SCHWETZLE		3 8
10	"	"	SAF	PBI		1061	JE, GEM, ET, DOUG SCHWETZLE	1/1	2 7
13	"	"	PBI	TEB		1062	JE, GEM, ET	1/1	2 3
18	"	"	TEB	PBI		1063	JE, ET, 1 FEMALE		2 4
20	"	"	PBI	TIST		1064	JE, GEM, ET, GUNDELIN, BUCK, SPENCER	1/1	2 0
25	"	"	TIST	INCM		1065	JE, GEM, ET, MELENDRA LUNZ, SIBER	1/1	4
25	"	"	INCM	TEB		1066	JE, GEM, ET, M.L. SL	1/1	4 2
30	"	"	TEB	PBI		1067	JE	1/1	2 3
31	"	"	PBI	JAX		1068	JE	1/1	8
31	"	"	JAX	APF		1069	JE, ELLEN SPENCER	1/1	8
31	"	"	APF	PBI		1070	JE, ELLEN SPENCER	1/1	4
42	"	"	PBI	TEB		1071	JE, SORAH BIDDLE		2 2
6	"	"	TEB	PBI		1072	JE, GEM, ET, SORAH BIDDLE, GVA, GEM TEB, GEM, ELLEN, LUNZ, BUCK	1/1	2 6
9	"	"	PBI	TEB		1073	JE, GEM, ET, CLARE HATLEY, JOK DAN DUBBY TEB, GEM, ELLEN, LUNZ, BUCK, SPENCER	1/1	2 4
12	"	"	TEB	PBI		1074	JE, GEM, JOK DAN DUBBY, LUNZ, BUCK ET, JEM + MRS COYNE, WHITTET, SORAH	1/1	2 6
Page Total								14	38 9
Amount Forward								5975	7095 3
Total to Date								5729	7134 2

I certify that the statements made by me on this form are true.

Pilot's Signature *David Rodafu*

CONFIDENTIAL DR_000015

Date 19 DEC	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Fixed Wing	Helicopter
14	G1159B	N900JE	PBI	TGB		1036	JE, ELLI, GVA, CEEVA, JOR DAN DUBIN, VAUNT, 2 FEMALE	1/1	2	1
17	"	"	TGB	BCT		1037	JE, MANOY ELLISON, GUNDOCKIN BACK, WAREEN, SPENCER, JIMMY + MAS COVING, EST		2	5
17	"	"	BCT	PBI		1038	JE, MANOY ELLISON, GUNDOCKIN BACK, JIMMY TAYLER			1
17	"	"	PBI	TGB		1039	JE, GM, EST, GLEN DUBIN, JIMMY + MAS COVING, WAREEN, SPENCER, JIMMY + MAS COVING, EST		2	3
8	"	"	TGB	SAF		1040	JE, GM, EST, DONG SCHOSTLE	1/1	3	8
10	"	"	SAF	PBI		1041	JE, GM, EST, DONG SCHOSTLE	1/1	2	7
13	"	"	PBI	TGB		1042	JE, GM, EST	1/1	2	3
18	"	"	TGB	PBI		1043	JE, EST, 1 FEMALE		2	4
20	"	"	PBI	TIST		1044	JE, GM, EST, GUNDOCKIN BACK, SPENCER	1/1	2	0
25	"	"	TIST	INCM		1045	JE, GM, EST, MELENDIA LUNZ, SPENCER	1/1		4
25	"	"	INCM	TGB		1046	JE, GM, EST, M.L. SL	1/1	4	2
30	"	"	TGB	PBI		1047	JE	1/1	2	3
31	"	"	PBI	JAX		1048	JE	1/1	8	
31	"	"	JAX	APF		1049	JE, ELLIEN SPENCER	1/1	8	
31	"	"	APF	PBI		1050	JE, ELLIEN SPENCER	1/1	4	
31	"	"	PBI	TGB		1051	JE, SOPHIE BIDDLE		2	7
6	"	"	TGB	PBI		1052	JE, GM, EST, SOPHIE BIDDLE, GVA, GLEN DUBIN, GUNDOCKIN BACK, VAUNT	1/1	2	6
9	"	"	PBI	TGB		1053	JE, GM, EST, SOPHIE BIDDLE, JIMMY + MAS COVING, WAREEN, SPENCER, JIMMY + MAS COVING, EST	1/1	2	4
12	"	"	TGB	PBI		1054	JE, GM, EST, SOPHIE BIDDLE, JIMMY + MAS COVING, WAREEN, SPENCER, JIMMY + MAS COVING, EST	1/1	2	6
Page Total Amount Forward Total to Date									38	9

I certify that the statements made by me on this form are true.

Pilot's Signature: *David Rodex*

Farid Doda.

Date 19 MAR	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endeavors	Number of Landings	Aircraft Category...
			From	To					
23	G1159B	N908JE	PBI	TEB		1005	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	22
25	"	"	TEB	SAF		1006	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	44
27	"	"	SAF	PBI		1007	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	29
31	C172	N5189B	LNA	LNA		1008	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	3/3	8
31	"	"	LNA	PBI-LNA		1009	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	13
16	C421	SEMUL0108				1010	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111		
17	"	"				1011	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111		
18	"	"				1012	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111		
18	G1159B	N908JE	PBI	TEB		1013	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	25
6	"	"	TEB	WH7		1014	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	7
6	"	"	WH7	RIC		1015	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	5
6	"	"	RIC	WH7		1016	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	4
6	"	"	WH7	TEB		1017	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	7
9	"	"	TEB	BEO		1018	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	6
9	"	"	BEO	TEB		1019	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	9
9	"	"	TEB	PBI		1020	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	23
11	C172	N751RR	LNA-FXE-LNA			1021	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	2/2	12
16	G1159B	N908JE	PBI	MYNN		1022	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	6
16	"	"	MYNN	PBI		1023	JE, GM, GUN, ANTI-SUBM. CEN. 1111 JE, GM, GUN, ANTI-SUBM. CEN. 1111	1/1	6
I certify that the statements made by me on this form are true.									
David Rodriguez								Page Total	226
								Amount Forward	1615
								Total to Date	11841

CONFIDENTIAL DR_000017

Delg 19 APR	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To					
17	G1159B	N908JE	PBI	PBJ		108	RECEPTION FOR GRS APPROACHES	1/1	1
17	C421	N908GM	PBI	X21			GRS WAGON, PAST, KEST, EQUIPE CONDUCT APPROX OPERATIONS	1/1	9
17	C421	"	X21	TIX			STAKE TO ABOVE	1/1	1
17	"	"	TIX	CRG			KRISTY RODGERS, PAST SIL, CLEMS, DESIGNS, TUNIS	1/1	6
18	"	"	CRG	LAL			PAST RODGERS, KRISTY SIL, CLEMS, DESIGNS, TUNIS	1/1	8
18	"	"	LAL	PBI			GRS WAGON, LANIER, KEST, PAST VER, DESIGNS, KEST, PAST, ROAD, GUN	1/1	1
19	G1159B	N908JE	PBI	CMH		109	JE, CLAR, PAST, 1 TEMPLE	1/1	2
20	"	"	CMH	LUK		110	JE, GINGER, MANDY LANE	1/1	3
20	"	"	LUK	TGB		111	JE, GINGER, MANDY LANE	1/1	1
24	"	"	TGB	PBI		112	JE, GINGER, MANDY LANE	1/1	2
25	C172	N75RR	LNA-PBI-LNA	LNA			CHARIS WAGON - NO FLAP APPROACH EMERGENCY PROCEEDING - LARS	4/4	1
25	"	"	LNA	LNA			SHORTLY SOFT, RECEPTION TALKING SOUND, GUN, LANIER, KEST, PAST, ROAD, GUN	6/6	8
26	"	"	LNA-PBI-LNA	TGB			RECEPTION PAST, EMERGENCY LANDING, 2 LARS, 5 OPERATIONS	5/5	9
26	G1159B	N908JE	PBI	TGB		113	JE, GM, ET	1/1	2
26	"	"	TGB	PBI		114	JE, GM, ET, ELEN, DUBBY, JEROME, CLAR, GUN, LANIER	1/1	2
26	C172	N75RR	LNA-PBI-LNA	LNA			SHORTLY SOFT, RECEPTION TALKING SOUND, GUN, LANIER, KEST, PAST, ROAD, GUN	11/11	1
3	G1159B	N908JE	PBI	TGB		115	JE, GM, ET, MANDY, GUN, LANIER, KEST, PAST, ROAD, GUN	1/1	2
5	"	"	TGB	BGD		116	JE, GM, ET, MANDY, GUN, LANIER, KEST, PAST, ROAD, GUN	1/1	6
5	"	"	BGD	TGB		117	JE, ROBBY, STEN	1/1	7
Page Total								40	72
Amount Forward								6024	7184
Total to Date								6064	7204

CONFIDENTIAL DR_000018


I certify that the statements made by me on this form are true

Pilot's Signature

David R. R. R.

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Manoeuvres, Endorsements	Number of Landings	Aircraft Category...
19			From To					
7 MAY 1954	G-1159B	N908JC	TEB TEB		1108	JE, ES		23
9	"	"	PBI TIST		1109	JE, ES, SHERREE, CLAR HAZEL	1/	20
11	"	"	TIST TEB		1110	JE, GM, ES, CLARE HAZEL, CHAD HAZEL	1/	37
15	"	"	TEB PBI		1111	JE, MANDY ELLISON	1/	20
17	"	"	PBI TEB		1112	JE	1/	24
18	"	"	TEB MDW		1113	GM, ES, SHANNON HAZEL, ALBERTO PENZO, 1 MALE	1/	16
18	"	"	MDW SAF		1114	GM, ES, JE, SHANNON, ALBERTO, 1 MALE		25
20	"	"	SAF LAX		1115	JE, GM, ES, ALBERTO, PENZO, 1 MALE	1/	17
20	"	"	LAX TEB		1116	GM, ES, ALBERTO, 1 MALE	1/	45
24 JUN	"	"	TEB PBI		1117	JE, MANDY ELLISON, 1 FEMALE	1/	22
8	"	"	PBI TEB		1118	JE, GUYARDON BECK, 1 FEMALE	1/	25
12	"	"	TEB TIST		1119	JE, GM, ES, CLARE HAZEL, MELANIE	1/	30
15	"	"	TIST JFK		1120	JE, GM, ES, CLARE HAZEL, MELANIE	1/	43
18	"	"	JFK PBI		1121	JE, GM, LYNN CLARANTILLA		20
21	"	"	PBI TEB		1122	JE, ALON ELLISON, GARY ROXBURG, GARY ROXBURG	1/	25
23	"	"	TEB BED		1123	JE, ROXBURG, GARY	1/	7
23	"	"	BED TEB		1124	JE, HENRY ROSOVSKY	1/	12
26	"	"	TEB PBI		1125	JE, GM, MELANIE LUNTZ, GARY ROXBURG	1/	26
TOTAL AT BOTTOM OF PAGE			REPORT TO INS			UNAN		
			Page Total			15		
			Amount Forward			6064		
			Total to Date			7269		

I certify that the statements made by me on this form are true.




 David Rockwell

CONFIDENTIAL DR_000019

Final Draft

* Date 10-18 AUG	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					As Reported	GL-Index
3	G1159B	N908JC	PBI	TEB		113	JG, GM, ADAM, GMMY, RON	1/1	2	5
4	"	"	TEB	HTO		113	JG, MELANIE STORVUS	1/1	7	
4	"	"	HTO	QQU		113	NO PASSENGERS	1/1	5	
4	"	"	QQU	TEB		113	JG	1/1	1	
5	"	"	TEB	RED		114	JG	1/1	8	
5	"	"	RED	MNY		114	JG	1/1	5	
5	"	"	MNY	TEB		114	JG	1/1	10	
6	"	"	TEB	CMH		114	JG	1/1	13	
6	"	"	CMH	TEB		114	JG	1/1	13	
7	"	"	TEB	TVC		114	JG, GM, ET, MICHAEL LUMS		18	
11	"	"	TVC	TEB		114	JG, GM, ET	1/1	15	
13	"	"	TEB	PBY		114	JG, GM, ET, PAULA EPSTEIN		24	
17	"	"	PBI	TEB		114	JG, GM, ET	1/1	25	
21	"	"	TEB	SAF		114	JG, GM, ET, ADAM PERBY LAMP	1/1	36	
24	"	"	SAF	ASE		115	JG	1/1	8	
22	SCHWIDE SP34	N4424C	OEO	OEO			T.O. + POW ASSISTED, STRANDED BY GAZES, TULSA, THORNTON, X-COUNTRY CLUBS			9
25	G1159B	N908JC	ASE	VNY		115	JG, JEE PRAGAN, GANESHAN ROSE	1/1	19	
29	"	"	VNY	PBE		115	JG	1/1	49	
9-1	"	"	PBI	TEB		115	JG, GM	1/1	24	
I certify that the statements made by me on this form are true.								Page Total		
								Amount Forward		
								Total In Date		
								6122		
								72738		
								6138		
								73055		

CONFIDENTIAL DR_000021


 David Proden

Plot's Signature David Plotkin

Date 19 46 CCT	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miss Flown No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To				ARKLAK	GLIDE	
6	G-1159B	N908JC	TEB	BED	1166	IC, RHONDA SIEGEL	1/1	6		
6	"	"	BED	TEB	1167	IC, RHONDA SIEGEL + WANDA MO		7		
9	"	"	TEB	OCA	1168	IC, ET, ADAM BERRYLAND	1/1	7		
9	"	"	OCA	PBI	1169	IC, GM, ET, AR		26		
12	"	"	PBI	TEB	1170	IC, GM, ET, AR	1/1	23		
15	"	"	TEB	PBI	1171	IC, SONNIE BEEDLE		21		
19	"	"	PBI	TEB	1172	IC, SONNIE BEEDLE	1/1	22		
21	"	"	TEB	BED	1173	IC	1/1	6		
21	"	"	BED	TEB	1174	IC, ALAN DERSHOWITZ	1/1	8		
23	"	"	TEB	PBI	1175	IC, GM, ET, GWYNDDOLYN BECK	1/1	23		
Nov 7	"	"	PBI	TEB	1176	NO PASSENGERS	1/1	23		
7	"	"	TEB	PBI	1177	IC		23		
10	"	"	PBI	TEB	1178	IC	1/1	25		
14	"	"	TEB	TIST	1179	IC, ET, CLARE HAZEL FRANKOIS	1/1	32		
15	"	"	TIST	PBI	1180	IC, GM, CLARE HAZEL ET, FRANKOIS	1/1	24		
16	"	"	PBI	CMH	1181	IC, GM, ET, CLARE HAZEL FRANKOIS	1/1	20		
16	"	"	CMH	TEB	1182	IC, GM, ET, FRANKOIS	1/1	11		
20	"	"	TEB	TIST	1183	IC, GM, ET, AP	1/1	33		
1	C421B	N408GM	PBI	NOPTW-POI			3/3	10		
I certify that the statements made by me on this form are true.							Page Total	16/12	34	
							Amount Forward	6146	7323	4
							Total to Date	6162	7322	8
										3

CONFIDENTIAL DR_000023

Pilot's Signature
David D. Dabau

CONFIDENTIAL DR_000024

Date 1958 Nov	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Signatures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Altimeter	Scope
26	G-1154B	N908JG	TIST	PBI		1184	TC, GM	1	2.5	11-10-58
29	"	"	PBI	TGB		1185	TC, GM, MAREK, PISTON, LYN, VOGEL, T-2, 3000, 4000, 5000, 6000, 7000, 8000, 9000, 10000, 11000, 12000, 13000, 14000, 15000, 16000, 17000, 18000, 19000, 20000, 21000, 22000, 23000, 24000, 25000, 26000, 27000, 28000, 29000, 30000, 31000, 32000, 33000, 34000, 35000, 36000, 37000, 38000, 39000, 40000, 41000, 42000, 43000, 44000, 45000, 46000, 47000, 48000, 49000, 50000, 51000, 52000, 53000, 54000, 55000, 56000, 57000, 58000, 59000, 60000, 61000, 62000, 63000, 64000, 65000, 66000, 67000, 68000, 69000, 70000, 71000, 72000, 73000, 74000, 75000, 76000, 77000, 78000, 79000, 80000, 81000, 82000, 83000, 84000, 85000, 86000, 87000, 88000, 89000, 90000, 91000, 92000, 93000, 94000, 95000, 96000, 97000, 98000, 99000, 100000	1	2.5	
29	"	"	TGB	PBI		1186	TC, ALEXIA	1	2.2	
30	"	"	PBI	TIST		1187	TC, SCHWAB, BUDOLE	1	2.3	
30	"	"	TIST	SAV		1188	OPS 2 INSPECTED	1	3.0	
31	"	"	SAV	PBI		1189	OPS 2 COMPLETED		9	
31	"	"	PBI	TIST		1190	RECEIVED	1	2.1	
1	"	"	TIST	PBI		1191	TC, GM	1	2.5	
4	"	"	PBI	TGB		1192	TC, GM, MAREK, PISTON, LYN, VOGEL, T-2, 3000, 4000, 5000, 6000, 7000, 8000, 9000, 10000, 11000, 12000, 13000, 14000, 15000, 16000, 17000, 18000, 19000, 20000, 21000, 22000, 23000, 24000, 25000, 26000, 27000, 28000, 29000, 30000, 31000, 32000, 33000, 34000, 35000, 36000, 37000, 38000, 39000, 40000, 41000, 42000, 43000, 44000, 45000, 46000, 47000, 48000, 49000, 50000, 51000, 52000, 53000, 54000, 55000, 56000, 57000, 58000, 59000, 60000, 61000, 62000, 63000, 64000, 65000, 66000, 67000, 68000, 69000, 70000, 71000, 72000, 73000, 74000, 75000, 76000, 77000, 78000, 79000, 80000, 81000, 82000, 83000, 84000, 85000, 86000, 87000, 88000, 89000, 90000, 91000, 92000, 93000, 94000, 95000, 96000, 97000, 98000, 99000, 100000	1	2.2	
9	"	"	TGB	ABY		1193	TC, ALEXIA	1	2.5	
10	"	"	ABY	SAF		1194	TC, ALEXIA	1	3.0	
12	"	"	SAF	VNY		1195	TC, ALEXIA	1	1.6	
15	"	"	VNY	PBI		1196	TC, GM, LUK		4.2	
19	"	"	PBI	TIST		1197	TC, GM, GT	1	2.1	
24	"	"	TIST	TGB		1198	TC, GM, GT, UG, G, LUK, PISTON, LYN, VOGEL, T-2, 3000, 4000, 5000, 6000, 7000, 8000, 9000, 10000, 11000, 12000, 13000, 14000, 15000, 16000, 17000, 18000, 19000, 20000, 21000, 22000, 23000, 24000, 25000, 26000, 27000, 28000, 29000, 30000, 31000, 32000, 33000, 34000, 35000, 36000, 37000, 38000, 39000, 40000, 41000, 42000, 43000, 44000, 45000, 46000, 47000, 48000, 49000, 50000, 51000, 52000, 53000, 54000, 55000, 56000, 57000, 58000, 59000, 60000, 61000, 62000, 63000, 64000, 65000, 66000, 67000, 68000, 69000, 70000, 71000, 72000, 73000, 74000, 75000, 76000, 77000, 78000, 79000, 80000, 81000, 82000, 83000, 84000, 85000, 86000, 87000, 88000, 89000, 90000, 91000, 92000, 93000, 94000, 95000, 96000, 97000, 98000, 99000, 100000	1	3.6	
29	"	"	TGB	PBI		1199	TC, GM, GT, UG, G, LUK, PISTON, LYN, VOGEL, T-2, 3000, 4000, 5000, 6000, 7000, 8000, 9000, 10000, 11000, 12000, 13000, 14000, 15000, 16000, 17000, 18000, 19000, 20000, 21000, 22000, 23000, 24000, 25000, 26000, 27000, 28000, 29000, 30000, 31000, 32000, 33000, 34000, 35000, 36000, 37000, 38000, 39000, 40000, 41000, 42000, 43000, 44000, 45000, 46000, 47000, 48000, 49000, 50000, 51000, 52000, 53000, 54000, 55000, 56000, 57000, 58000, 59000, 60000, 61000, 62000, 63000, 64000, 65000, 66000, 67000, 68000, 69000, 70000, 71000, 72000, 73000, 74000, 75000, 76000, 77000, 78000, 79000, 80000, 81000, 82000, 83000, 84000, 85000, 86000, 87000, 88000, 89000, 90000, 91000, 92000, 93000, 94000, 95000, 96000, 97000, 98000, 99000, 100000	1	2.3	
30	"	"	ABY - PB	PMP		1	SEE MANEUVERS INDEX, A, B			1.2
30	"	"	PBI	TGB		200	TC, GM, GT, UG, G, LUK, PISTON, LYN, VOGEL, T-2, 3000, 4000, 5000, 6000, 7000, 8000, 9000, 10000, 11000, 12000, 13000, 14000, 15000, 16000, 17000, 18000, 19000, 20000, 21000, 22000, 23000, 24000, 25000, 26000, 27000, 28000, 29000, 30000, 31000, 32000, 33000, 34000, 35000, 36000, 37000, 38000, 39000, 40000, 41000, 42000, 43000, 44000, 45000, 46000, 47000, 48000, 49000, 50000, 51000, 52000, 53000, 54000, 55000, 56000, 57000, 58000, 59000, 60000, 61000, 62000, 63000, 64000, 65000, 66000, 67000, 68000, 69000, 70000, 71000, 72000, 73000, 74000, 75000, 76000, 77000, 78000, 79000, 80000, 81000, 82000, 83000, 84000, 85000, 86000, 87000, 88000, 89000, 90000, 91000, 92000, 93000, 94000, 95000, 96000, 97000, 98000, 99000, 100000	1	2.5	
2	G-1154B	N908JG	PBI	TGB		201	TC, GM, GT, UG, G, LUK, PISTON, LYN, VOGEL, T-2, 3000, 4000, 5000, 6000, 7000, 8000, 9000, 10000, 11000, 12000, 13000, 14000, 15000, 16000, 17000, 18000, 19000, 20000, 21000, 22000, 23000, 24000, 25000, 26000, 27000, 28000, 29000, 30000, 31000, 32000, 33000, 34000, 35000, 36000, 37000, 38000, 39000, 40000, 41000, 42000, 43000, 44000, 45000, 46000, 47000, 48000, 49000, 50000, 51000, 52000, 53000, 54000, 55000, 56000, 57000, 58000, 59000, 60000, 61000, 62000, 63000, 64000, 65000, 66000, 67000, 68000, 69000, 70000, 71000, 72000, 73000, 74000, 75000, 76000, 77000, 78000, 79000, 80000, 81000, 82000, 83000, 84000, 85000, 86000, 87000, 88000, 89000, 90000, 91000, 92000, 93000, 94000, 95000, 96000, 97000, 98000, 99000, 100000	1	2.5	
2	206B3	SAF	PMP	PMP		2	A, E			8
Page Total								14/8	42.0	2.0
Amount Forward								5.67	732.8	3.3
Total to Date								6.176	740.8	2.6
								5.892		

I certify that the statements made by me on this form are true.

Pilot's Signature: Daniel Reda

CONFIDENTIAL DR_000025

Date 18/11/19	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					PERMAN	ELDER
3	206B3	59PH	PMP	PMP		3	A, E, F			
4	"	"	"	"		4	A, E - Full controls			
5	G-1154B	N908JC	TEB	PBI		120	TEB, G, E, M, A, N, S, P, R, N, S, S, H, A, R, A, N, S, W, I, T, C, H, E, H, A, L, L, E	1	2	1
02/05	206B3	59PH	PMP	PMP		5	A, E - Advanced maneuvers			
02/06	206B	59PH	PMP-PBI	PMP		6	A-E / start of C & D			
3/1	"	"	"	"		7	A-14			
7	G-1154B	N908JC	PBI	TEB		1202	TEB, G, E, M, A, N, S, P, R, N, S, S, H, A, R, A, N, S, W, I, T, C, H, E, H, A, L, L, E		2	1
9	"	"	TEB	TEST		1203	TEB, G, E, M, A, N, S, P, R, N, S, S, H, A, R, A, N, S, W, I, T, C, H, E, H, A, L, L, E		3	3
12	"	"	TEST	PBI		1204	TEB, G, E, M, A, N, S, P, R, N, S, S, H, A, R, A, N, S, W, I, T, C, H, E, H, A, L, L, E	1	2	6
13	206A3	59PH	PMP-LCL	PAT-PMP			A-14 / start of C			
02.15	BH206-02	N7010H	VNY	PRO VNY			TEB, G, E, M, A, N, S, P, R, N, S, S, H, A, R, A, N, S, W, I, T, C, H, E, H, A, L, L, E	5		
14	G-1154B	N908JC	PBI	SAF		1205	TEB, G, E, M, A, N, S, P, R, N, S, S, H, A, R, A, N, S, W, I, T, C, H, E, H, A, L, L, E	1	3	6
15	"	"	SAF	VNY		1206	TEB, G, E, M, A, N, S, P, R, N, S, S, H, A, R, A, N, S, W, I, T, C, H, E, H, A, L, L, E	1	1	6
16	B206B	N7010H	VNY	PRO VNY			TEB, G, E, M, A, N, S, P, R, N, S, S, H, A, R, A, N, S, W, I, T, C, H, E, H, A, L, L, E			
17	G-1154B	N908JC	VNY	MRV		1207	TEB, G, E, M, A, N, S, P, R, N, S, S, H, A, R, A, N, S, W, I, T, C, H, E, H, A, L, L, E	1	7	
20	"	"	MRV	SAF		1208	TEB, G, E, M, A, N, S, P, R, N, S, S, H, A, R, A, N, S, W, I, T, C, H, E, H, A, L, L, E	1	1	9
21	"	"	SAF	TEB		1209	TEB, G, E, M, A, N, S, P, R, N, S, S, H, A, R, A, N, S, W, I, T, C, H, E, H, A, L, L, E	1	3	5
24	"	"	TEB	PBI		1210	TEB, G, E, M, A, N, S, P, R, N, S, S, H, A, R, A, N, S, W, I, T, C, H, E, H, A, L, L, E	1	2	4
26	206L3	500JA	PMP	PMP			Reviewed A-E, Demo - H, J, & V			
I certify that the statements made by me on this form are true.								Page Total Amount Forward Total to Date		
Pilot's Signature David Rodefer								7/5 6176 6183		
								238 7404 7428		
								11 33 33		
								2 20 12		

CONFIDENTIAL DR_000026

Date 19 <u>44</u>	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown, No.	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ASB PLANE GLIDER	RECEIPT
27	206L3	N500JA	PMP	PMP			A-F, F, M, + V / Demo - N			13
03/01	206L3	500JA	PMP	PMP			C, D, M, + V			11
03/01	206B2	N7081A	PMP-LNA-PBE-PMP	PMP			ENG TRAINING, INCLD - C-62			4
03/02	206L3	500JA	PMP	PMP			N, H, + J			18
03/03	206L3	500JA	PMP-PB1-PMP	PMP			A-F			10
03/04	206L3	500JA	PMP-PB1-BAT-PMP	PMP			A, H (Pre-sale prep)			15
03/05	206L3	500JA	PMP-PB1-LNA-PMP	PMP			A, H (Pre-sale prep)			16
03/06	206L3	500JA	PMP-PB1-LNA-PMP	PMP			Finished prep / 1st solo at PMP			11
3/7	G-1159B	N908JC	PBT	TEB	1211		TCM/GT, MAG-100 LUTIN, NIX	1	25	
3/13	PB28-161	N510PU	JNY	GRD			3 GLIDERS TCM/GT, MAG-100 LUTIN, NIX RECEIVED BY REGRANT TO EMERGENCY NATIONAL SYSTEMS PARTIAL FAMILY AND COMMUNICATIONS APPROXIMATELY 1/1	1	42	
3/16	206L3	500JA	GRD	ORL			TABLET PRACTICE	1	48	
3/17	C421B	N908GM	PBT	GYW			COMMISSIONING, NIX, MAG-100 LUTIN, NIX NATIONAL SYSTEMS PARTIAL FAMILY AND COMMUNICATIONS APPROXIMATELY 1/1	1	15	19
3/17	C421B	N908GM	GYW	PBE			TCM/GT, MAG-100 LUTIN, NIX RECEIVED BY REGRANT TO EMERGENCY NATIONAL SYSTEMS PARTIAL FAMILY AND COMMUNICATIONS APPROXIMATELY 1/1	1	25	
3/18	PB28-161	N510PU	ORL	DBN			TCM/GT, MAG-100 LUTIN, NIX RECEIVED BY REGRANT TO EMERGENCY NATIONAL SYSTEMS PARTIAL FAMILY AND COMMUNICATIONS APPROXIMATELY 1/1	1	40	
3/19	PB28-161	N510PU	DBN	JNY			TCM/GT, MAG-100 LUTIN, NIX RECEIVED BY REGRANT TO EMERGENCY NATIONAL SYSTEMS PARTIAL FAMILY AND COMMUNICATIONS APPROXIMATELY 1/1	1	45	
3/21	G1159B	N908JC	TEST	TEB	1214		TCM/GT, MAG-100 LUTIN, NIX RECEIVED BY REGRANT TO EMERGENCY NATIONAL SYSTEMS PARTIAL FAMILY AND COMMUNICATIONS APPROXIMATELY 1/1	1	42	23
3/23	206L3	500JA	PMP-215-SUA-PMP	PMP			DUAL CROSS COUNTRY			14
3/23	206L3	500JA	PMP	PMP			B C D			19
Total									74	282
Amount Forward									6183	132
Total to Date									6190	223

I certify that the statements made by me on this form are true.


David Bodger
Pilot's Signature

Fareed Bokhari
Pilot's Signature

I certify that the statements made by me on this form are true

Pilot's Signature David Vidale

CONFIDENTIAL DR_000029

Date Mo/Yr	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles From	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					APPROPRIATE CATEGORY	NUMBER OF LANDINGS
17	G-1159B	N908JE	TEB	SAF		1234	1234	1	3	3
17	"	"	SAF	ABQ		1235	1235	1	2	2
18	"	"	ABQ	DAL		1236	1236	1	1	1
18	"	"	DAL	PBE		1237	1237	1	1	1
19	2108-1EB	N500JA	PBE-LNA	PBE		1238	1238	1	1	1
20	"	"	PMP	PMP		1239	1239	1	1	1
21	"	"	PMP	DAB		1240	1240	1	1	1
21	"	"	DAB	PBI		1241	1241	1	1	1
21	"	"	PBI	PMP		1242	1242	1	1	1
23	G-1159B	N908JE	PBE	TEB		1243	1243	1	1	1
27	FLIGHT TIMES REPORTED TO INSURANCE COMPANY		TEB	PBI		1244	1244	1	1	1
29	G-1159B	N908JE	TEB	PBI		1245	1245	1	1	1
29	"	"	PBI	TEB		1246	1246	1	1	1
30	"	"	TEB	PBI		1247	1247	1	1	1
31	"	"	PBI	SAF		1248	1248	1	1	1
31	"	"	SAF	PBI		1249	1249	1	1	1
7	"	"	PBI	TEB		1250	1250	1	1	1
9	"	"	TEB	PBI		1251	1251	1	1	1
15	"	"	PBI	TEB		1252	1252	1	1	1
I certify that the statements made by me on this form are true.										
<div style="text-align: right;">  Daniel Anderson </div>										<div style="text-align: right;"> Page Total Amount Forward Total in Pounds </div>
								9/7	32.1	61
								62.67	7509.9	33
								62.16	7509.9	33

Date 18 JUN	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Propeller	Jet
25	IGMTA	N282A	PBF-LNA	PBI			SPRUE, ENCHANCEMENT, CRITICAL 9733 W/L RECOVERY, COME BACK UNDER, STEEP FLY	6/6	1	3
19	G1159B	N908JC	TEB	PBI		1248	JG, G, M, ET	1/1	2	4
27	"	"	PBI	TEB		1249	JG, ET, SHELLEY	1/1	2	5
29	"	"	TEB	BED		1250	JG	1/1	0	
29	"	"	BED	TEB		1251	JG		1	0
29	"	"	TEB	PBI		1252	JG, ET, TIFFANY GRANZA	1/1	2	3
2	KAMAIA	N6910A	FPR	FPR		1253	CLIMB, 001, STALL, STEEP TURN, COMING BACK UNDER, RECOVERY	5/5	1	0
3	G1159B	N908JC	PBI	TEB		1253	JG, CLIMB, HAZEL, TIFFANY GRANZA	1/1	2	6
4	"	"	TEB	TEB		1254	JG, CLIMB, HAZEL, TIFFANY GRANZA	1/1	3	7
6	Bell 206 2-111	N16909	PMP-SUA	PMP			DUAL CROSS COUNTRY, AF, NTC, BT, NGRC THRU 30 NM 5000 N40101			2 2
7	"	"	PMP-X44-LNA-FMP							2 3
13	"	"	PMP-X44-PMP				SOLO NTC BT			2 8
16	DA 20	N125MF	HWO	HWO			Pflicht, Kytany, 001, COMING BACK UNDER, STEEP TURN, RECOVERY, COME BACK UNDER, STEEP FLY	2/2		4
16	DA 20	"	HWO-PBF-HWO				SLAM FLIGHT, RECOVERY, 001, 001, 001, 001, 001, 001, 001, 001, 001, 001, 001, 001	3/3	3	4
15	G1159B	N908JC	TEB	PBI		1255	JG, G, M, ET		2	5
22	"	"	PBI	SAF		1256	JG, G, M, ET	1/1	3	4
25	"	"	SAF	VNY		1257	JG, G, M, ET, LISA	1/1	1	7
29	"	"	VNY	OAK		1258	JG, SHELLEY	1/1	9	
29	"	"	OAK	SAF		1259	JG, SHELLEY	1/1	2	2
I certify that the statements made by me on this form are true.									Page Total	
									26	32
									62	75
									42	65
									0	6

CONFIDENTIAL DR_000030

D. J. P. M.

Pilot's Signature Daniel Carter

Date 1991	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To				Approved	Checked
5	G-1159B	N9088JC	SAN	SAS	127	JE, SHANNON HEALY	1	1	6
7	"	"	SAS	TEB	127	JE, CLARE, VICTORIA HAZEL, ADAM	1	3	5
8	"	"	TEB	CMA	128	JE, CLARE HAZEL	1	1	4
8	"	"	CMA	TEB	129	JE, CLARE, MARSHALL, MALL		1	3
9	"	"	TEB	PBI	128	JE, CLARE HAZEL		2	5
13	"	"	PBI	TEB	128	JE, CLARE HAZEL, MARSHALL, CLARE HAZEL	1	2	4
17	"	"	TEB	PBI	128	JE, CLARE HAZEL, MARSHALL, CLARE HAZEL	2/2	2	4
19	C-172	N2388L	LNA	LNA	128	ALC, CLARE HAZEL, MARSHALL, CLARE HAZEL	1	2	5
20	G-1159B	N9088JC	PBI	TEB	128	JE, CLARE HAZEL, MARSHALL, CLARE HAZEL	1	2	6
22	"	"	TEB	PBI	128	JE, CLARE HAZEL, MARSHALL, CLARE HAZEL	1	1	1
23	C-172	N2388L	LNA	FXG	128	ED AMARO CFI RENEWAL	1	1	5
23	"	"	FXG	LNA	128	ED AMARO CFI RENEWAL	1	2	5
25	G-1159B	N9088JC	PBI	TEB	128	JE, CLARE HAZEL, MARSHALL, CLARE HAZEL	1	3	8
26	"	"	TEB	TEB	128	JE, CLARE HAZEL, MARSHALL, CLARE HAZEL	1	3	5
27	"	"	TEB	TEB	128	JE, CLARE HAZEL, MARSHALL, CLARE HAZEL	1	2	6
29	"	"	TEB	TEB	128	JE, CLARE HAZEL, MARSHALL, CLARE HAZEL	1	3	7
11	"	"	PBI	SAC	128	JE, CLARE HAZEL, MARSHALL, CLARE HAZEL	1	3	5
12	"	"	SAC	TEB	128	JE, CLARE HAZEL, MARSHALL, CLARE HAZEL	1	7	
14	"	"	TEB	BED	128	JE, CLARE HAZEL, MARSHALL, CLARE HAZEL	1	42	8
Page Total							6/14	42	8
Amount Forward							6254	7618	0
Total to Date							6210	7600	8
							5969	3	3
								74	3

CONFIDENTIAL DR_000032

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodriguez

David P. Pacheco

I certify that the statements made by me on this form are true

Plot's Signature

I certify that the statements made by me on this form are true.

Pilot's Signature _____

I certify that the statements made by me on this form are true.

Date 2005/	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Fixed-Wing	Helicopter
8 MAY	G-154B	N908JL	TIST	TEB		1340	JG, GM, ES, AP, 1 FEMALE ENROUTE TO TIST, 1000 HRS. 1000 HRS. 1000 HRS.	1	3	8
12	"	"	TEB	PBI		1343	JG, GM, ES, AP, 1 FEMALE ENROUTE TO PBI, 1000 HRS. 1000 HRS.	1	2	4
15	"	"	PBI	TEB		1349	JG, GM, ES, AP, 1 FEMALE ENROUTE TO TEB, 1000 HRS. 1000 HRS.	1	2	4
16	"	"	TEB	TIST		1344	JG, GM, ES, AP, 1 FEMALE ENROUTE TO TIST, 1000 HRS. 1000 HRS.	1	3	6
21	"	"	TIST	TEB		1341	JG, GM, ES, AP, 1 FEMALE ENROUTE TO TEB, 1000 HRS. 1000 HRS.	1	4	0
30	"	"	TEB	MDW		1342	REPOSITION		1	9
31	"	"	MDW	TEB		1348	JG, GM		1	7
JUN 1	"	"	TEB	PBI		1344	JG, GM, ES, AP, 1 FEMALE		2	4
4	"	"	PBI	TEB		1345	JG, GM, ES, AP, 1 FEMALE	1	2	4
9	"	"	TEB	SAF		1346	JG, GM, 1 FEMALE	1	3	9
12	"	"	SAF	VNY		1347	JG	1	1	7
14	"	"	VNY	SFO		1348	JG	1	1	2
14	"	"	SFO	LAS		1349	JG	1	1	2
15	"	"	LAS	PAX		1350	JG	1	1	0
17	"	"	PAX	PBI		1351	JG	1	3	9
18	"	"	PBI	TEB		1352	JG	1	2	6
25	"	"	TEB	TIST		1353	JG, GM, ES, AP, 1 FEMALE ENROUTE TO TIST, 1000 HRS. 1000 HRS.	1	3	7
25	"	"	TIST	TEB		1354	JG, GM, ES, AP, 1 FEMALE ENROUTE TO TEB, 1000 HRS. 1000 HRS.	1	3	7
25	"	"	TEB	PBI		1355	REPOSITION	1	2	4
Page Total									49	9
Amount Forward									7768	8
									33	112

I certify that the statements made by me on this form are true.

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CONFIDENTIAL DR_000037

Family Order

Date 2000	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Engagements	Number of Landings	Aircraft Category...	
			From	To					Aggregating	Helicopter
24 AUG	G-1159B	N908JE	SAF	VNY		1374	JE, KELLY SPAMM	1	1	7
26	"	"	VNY	TEB		1380	JE, GM, AP	1	4	9
31	"	"	TEB	PBI		1381	JE	2	2	2
6 SEP	"	"	PBI	TEB		1382	JE	1	2	5
9	"	"	TEB	PBI		1383	JE, GM, ET, AP	1	2	3
10	"	"	PBI	TIST		1384	JE, GM, ET, AP, CHERI KRAPE	1	2	5
12	"	"	TIST	TEB		1385	JE, GM, ET, AP, CHERI KRAPE	1	3	9
21	"	"	TEB	SAF		1386	JE, GM, AP, JOE MAGANO, 1 FEMALE	1	4	2
25	"	"	SAF	VNY		1387	JE, KELLY SPAMM	1	1	8
26	"	"	VNY	TEB		1388	JE, TIFFANY GRAMZA	1	4	8
29	"	"	TEB	TIST		1389	JE, PETER MARINO, 1 PERSON	1	3	6
30	"	"	TIST	PBI		1390	JE, PETER MARINO, 1 FEMALE	1	2	6
2 OCT	"	"	PBI	TEB		1391	JE, GM, ET, 1 FEMALE	1	2	5
5	"	"	TEB	PBI		1392	JE, SHELLEY LEWIS	1	2	4
10	"	"	PBI	TEB		1393	JE, GM, ET	1	2	5
13	"	"	TEB	LGA		1394	JE, SHELLEY LEWIS RESERVATION FOR PARIS	1	7	1
13	"	"	LGA	LFPB		1395	JE, VOR HOLDING	1	1	3
15	"	"	LFPB	EGBB		1396	JE, SHELLEY LEWIS	1	6	4
17	"	"	EGBB	BGR		1397	JE, SHELLEY LEWIS	1	13	10
I certify that the statements made by me on this form are true.								59	7	
Page Total								6318	7875	9
Amount Forward								6005	33	112
Total to Date								6331	7935	6
								6015	33	112

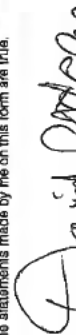
CONFIDENTIAL DR_000039

Pilot's Signature

David Rodriguez

Date +9- 2000	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Propeller	Helicopter
17 OCT	G-1159B	N908JE	BGR	LGA		1388	JE, SHELLEY LEWIS	✓	1	3
20	"	"	PBI	MIA		1400	JE, GM, ET, KELLY SPANN KORBUCH		6	
21	"	"	MIA	TIST		1401	JE, GM, ET, KELLY SPANN KORBUCH		2	3
23	"	"	TIST	EWB		1402	JE, GM, ET KORBUCH	✓	3	9
25	"	"	EWB	EGGW		1403	JE, GM, ET	✓	6	4
28	"	"	EGGW	BGR		1404	JE, GM, ET NORTHWELL LIGHTS		7	1
29	"	"	BGR	PBI		1405	JE, GM, ET		3	0
29	"	"	PBI	TCEB		1406	JE, GM, ET	✓	2	7
31 NOV	"	"	TCEB	PBI		1407	JE, SHELLEY LEWIS		1	9
5	"	"	PBI	TIST		1408	JE, SHELLEY LEWIS, JESSICA BARBER	✓	2	4
7	"	"	TIST	T-B		1409	JE, SHELLEY LEWIS, JESSICA BARBER	✓	4	4
9	"	"	TCEB	PBI		1410	JE, ET	✓	2	4
12	"	"	PBI	CMA		1411	JE,	✓	2	2
12	"	"	CMA	PBI		1412	JE	✓	2	3
15	"	"	PBI	SAF		1413	JE, GM, ET		4	2
16	"	"	SAF	VNY		1414	JE, GM, ET	✓	1	9
17	"	"	VNY	SAN		1415	GM, ET	✓	7	
17	"	"	SAN	PBI		1416	JE, GM, ET		4	0
19	"	"	PBI	BED		1417	JE, GM, ET	✓	2	6
I certify that the endorsements made by me on this form are true.								Page Total	119	563
								Amount Forward	6331	7935
									6	112

CONFIDENTIAL DR_000040



 David D. D. D.

CONFIDENTIAL DR_000041

Date -Mo- -Day- -Year	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ADP	LCR
19 Nov 2000	G-1159B	N 908JE	BGD	TGB		1418	JG, SHELLEY LEWIS		1	1
22	"	"	TGB	DCA		1419	JG, AP, SHELLEY LEWIS	1/1	1	0
22	"	"	DCA	PBI		1420	JG, AP, SHELLEY LEWIS	1/1	2	2
28	"	"	PBI	TIST		1421	JG, GM		2	4
30	"	"	TIST	PBI		1422	JG, GM	1/1	2	7
Dec 1	"	"	PBI	DFW		1423	JG, GM	1/1	2	7
1	"	"	DFW	ABQ		1424	JG, GM, RICHARD LEGGRENDA	1/1	1	8
2	"	"	ABQ	SAF		1425	REPOSITION	1/1		5
2	"	"	SAF	TGB		1426	JG, GM		3	5
5	"	"	TGB	LFPB		1427	JG, GM, ET, KELLY SPAMM	1/1	6	8
6	"	"	LFPB	EGGW		1428	JG, GM, ET, KELLY SPAMM		1	0
7	"	"	EGGW	EGYM		1429	JG, GM, KELLY SPAMM, TOM PRITZKEE 1. REPOSITION (MAGNAN AIR FORCE BASE)			5
7	"	"	EGYM	EGSH		1430	REPOSITION (MAGNAN AIR FORCE BASE)			4
9	"	"	EGSH	CYQX		1431	JG, GM, ET, KELLY SPAMM (FLYING SHOWN ON RUMBAW)		5	0
9	"	"	CYQX	PBI		1432	JG, GM, ET, KELLY SPAMM		4	7
11	"	"	PBI	TGB		1433	JG, GM, ET, VICKHARD	1/1	2	6
14	"	"	TGB	TIST		1434	JG, GM, AP, VICKHARD	1/1	3	5
14	"	"	TIST	PBI		1435	REPOSITION FOR OPS 2 ATLAS		2	4
2000 Jan 13	"	"	PBI	PBI		1436	TEAS CERTIFICATION	1/1	7	
I certify that the statements made by me on this form are true.									Page Total	
									9/10	455
									6342	
									74919	33
									116	6

And Data.

Print's Signature David Robinson

Pilot's Signature

I certify that the statements made by me on this form are true.

Pilot's Signature David L. Lutz

CONFIDENTIAL DR_000045

Date 49 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ADP MOD	CL-DPR
4	G-1159B	N909JC	BEO	TEB		1488	JG			9
5	"	"	TEO	PBF		1487	JG, GT, BK			2
6	C-421B	N908GM	PBF	FLL		1486	LARRY MORRISON, TAYLOR, CLUMPS TURNING, DECEMBER	1/1		3
6	"	"	FLL	PBI		1485	LARRY MORRISON, TAYLOR, CLUMPS TURNING, DECEMBER	1/1		7
9	G-1159B	N909JC	PBF	ACY		1484	JG, GT, VR, BK, JOHNN	1/1		6
9	"	"	ACY	TEB		1483	JG, GT, VR, BK, JOHNN	1/1		2
11	"	"	TEB	TEST		1482	JG, GT, VR, BK, JOHNN	1/1		7
16	"	"	TEST	PBF		1481	JG, GT, VR, BK, JOHNN	1/1		3
17	"	"	PBF	TEB		1480	JG, GT, VR, BK, JOHNN	1/1		2
20	"	"	TEB	PBF		1479	JG, GT, VR, BK, JOHNN	1/1		2
23	"	"	PBF	GR L		1478	JG, GT, VR, BK, JOHNN	1/1		8
23	"	"	GR L	TEB		1477	JG, GT, VR, BK, JOHNN	1/1		2
27	"	"	TEB	SAC		1476	JG, GT, VR, BK, JOHNN	1/1		3
29	"	"	SAC	VNY		1475	JG, GT, VR, BK, JOHNN	1/1		1
30	"	"	VNY	SAN		1474	JG, GT, VR, BK, JOHNN	1/1		7
2	"	"	SAN	LIT		1473	JG, GT, VR, BK, JOHNN	1/1		3
3	"	"	LIT	ADS		1472	JG, GT, VR, BK, JOHNN	1/1		9
3	"	"	ADS	SAT		1471	JG, GT, VR, BK, JOHNN	1/1		4
5	"	"	SAT	PBF		1470	JG, GT, VR, BK, JOHNN	1/1		2
Page Total Amount Forward Total to Date								14/11	351	33

I certify that the statements made by me on this form are true.

David Rodden
Pilot's Signature

I certify that the statements made by me on this form are true

Pilot's Signature _____

I certify that the statements made by me on this form are true.

Pilot's Signature

CONFIDENTIAL DR_000048

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Altcraft Category...	
			From	To					Altcraft	Category
16 JUL 2001	G-1159B	N908JC	CPS	SAF		1521	REPOSITION-OUT OF STATION LOGIC CHECKS	1/1	2	2
16	"	"	SAF	TEB		1522	IC, ST, GM, VR	1/1	3	5
23	"	"	PBF	TIST		1523	IC, ST, GM, VR	1/1	2	5
28	"	"	TISS	PBF		1531	IC, ST, GM, VR	1/1	2	6
29	"	"	PBF	ISP		1532	IC	1/1	2	5
29	"	"	ISP	TEB		1533	IC	1/1	2	7
3	B-727-31	N908JC	JAX	PBF		1534	IC, GM, ES, 1, KENALC	1/1	2	4
4	B-727-100	N908JC	MDD	MFA			MDD CONDUCTED IN FLIGHT SECTOR	4/4	1	1
5	G-1159B	N908JC	PBF	TEB		1535	IC, GM, DP, CT, TAYLOR	1/1	2	6
5	"	"	TEB	PBF		1536	NO PASSENGERS	1/1	2	3
7	B-727-31	N908JC	PBF	LGA		1	IC, GM, ES, 2, FENALGS	1/1	2	6
7	"	"	LGA	ABQ		2	IC, GM, ES, 2, FENALGS	1/1	4	0
14	C-421B	N908GM	PBF	JAN			IC, GM, ES, 2, FENALGS	1/1	3	9
14	"	"	JAN	AMA			IC, GM, ES, 2, FENALGS	1/1	3	6
14	"	"	AMA	CEQ			IC, GM, ES, 2, FENALGS	1/1	1	7
15	"	"	CEQ	ABQ			IC, GM, ES, 2, FENALGS	1/1	5	
15	"	"	ABQ	ZURD			IC, GM, ES, 2, FENALGS	1/1	7	
16	B-727-31	N908JC	ABQ	PBF		6	IC, GM, ES, 2, FENALGS	1/1	5	8
I certify that the statements made by me on this form are true.									Page Total	25/17
									Amount Forward	6430
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										6450
									8283	1
									3	3
									112	6

Pilot's Signature

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ATIS	Category
Aug 19	B-727-31	N908JC	PBI	HPN		7	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
24	"	"	HPN	PBI		8	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
27	"	"	PBI	HPN		9	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
29	"	"	HPN	TIST		10	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
30	G-1159B	N908JC	PBI	PBI		11	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	3/3	ATIS	1654/1654
Sep 3	B-727-31	N908JC	TIST	HPN		11	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
6	"	"	HPN	PBI		12	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
9	"	"	PBI	HPN		13	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
15	"	"	HPN	PBI		14	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
20	C-172	N144LV	LNA	LNA		15	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	4/4	ATIS	1654/1654
Sep 19	B-727-31	N908JC	PBI	HPN		15	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
21	"	"	HPN	CTRX		16	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
22	"	"	CTRX	LFB		17	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
25	"	"	LFB	CTRX		18	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
25	"	"	CTRX	HPN		19	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
28	"	"	HPN	PBI		20	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
Sep 5	"	"	PBI	ABQ		21	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
8	"	"	ABQ	HPN		22	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654
8	"	"	HPN	JAX		23	JE, GM, ET, DP, FL, RE, RAN, AL, C, Z, A, R, U, L, R, O, L, E, N	1/1	ATIS	1654/1654

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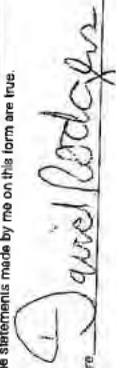
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I certify that the statements made by me on this form are true.

Pilot's Signature



CONFIDENTIAL DR_000049

Date 19 2008	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRCRAFT CATEGORY	HELIUM
15	C172R	N395SP	LNA	LNA				3/3	5	
15	"	N395SP	LNA-BXT-LNA	LNA			LARRY MORRISON - BFR SATISFACTION STATUS, MCO, STEVE JULIAN, G. MORRISON, L. MORRISON	4/4	13	
9	B-721-31	N908JL	JAX	LCQ		24	NO PASSENGER	1/1	5	
10	G-1159B	N909JL	PBI	TEB		1538	NO PASSENGER	0/0	25	
11	"	"	TEB	PBI		1534	JE SARAH KELLEN		23	
15	"	"	PBI	TEB		1540	JE/GM, SK, LARRY, STEVE, 1 FEMALE	1/1	24	
17	"	"	TEB	TEB		1541	JE, ANNIE	1/1	8	
17	"	"	TEB	TEB		1542	JE, BONNIE		10	
18	"	"	TEB	TEB		1543	JE, GM, MRS, 2 FEMALE		35	
23	"	"	TEB	TEB		1544	JE, GM, MRS, 2 FEMALE	1/1	40	
26	"	"	TEB	PBI		1545	JE, CT, SK, STEVE, LARRY, G. MORRISON, 2 FEMALE	1/1	26	
30	"	"	PBI	LCQ		1546	JE, SARAH KELLEN, JULIE	1/1	10	
30	"	"	LCQ	TEB		1547	JE, SK, JULIE	1/1	20	
Nov	"	"	TEB	SAF		1548	JE, GM, SK	1/1	40	
5	"	"	SAF	ASC		1549	JE, GM, SK	1/1	8	
5	"	"	ASC	PBI		1550	JE, GM, SK	1/1	37	
6	"	"	PBI	CMH		1551	JE, SK, BELLA WYNN'S FUNERAL	1/1	24	
6	"	"	CMH	TEB		1552	JE, SK		14	
9	"	"	TEB	LCQ		1553	JE, AP, SK, JULIE	1/1	22	
I certify that the statements made by me on this form are true.								Page Total 18 Amount Forward 6463 Total to Date 83826 331126 212110		

CONFIDENTIAL DR_000050

Pilot's Signature

F. Avellecione

CONFIDENTIAL DR_000051

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Manoeuvres, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ACREVALS	GADECC
9	G-1159B	N909JE	LCQ	PBJ		1584	TC, AB, SK, JULIE	1/1	1	0
12	"	"	PBJ	TEB		1555	TC, GM, AP, JUEL PASADOW, JULIE, SK	1/1	2	5
15	"	"	TEB	PBJ		1584	TC, GM, SK, AP, JULIE, SK, PASADOW, JULIE, SK	1/1	2	5
17	B-727-31	N908JE	LCQ	PBJ		25	AC, PASADOW, JULIE, SK, PASADOW, JULIE, SK	1/1	0	9
18	"	"	PBJ	CYQX		26	TC, GM, SK	1/1	4	3
18	"	"	CYQX	LFPB		27	TC, GM, SK	1/1	4	9
23	"	"	LFPB	LIML		28	TC, GM, SK	1/1	1	2
23	"	"	LIML	LPR		29	TC, GM, SK, PASADOW, JULIE, SK	1/1	8	
23	"	"	LPR	LIML		30	TC, GM, SK	1/1	9	
24	"	"	LIML	EGGW		31	TC, GM, SK	1/1	1	7
26	"	"	EGGW	HPN		32	TC, GM, SK	1/1	7	9
30	"	"	HPN	PBJ		33	TC, SK, GM, PASADOW, JULIE, SK, PASADOW, JULIE, SK	1/1	2	5
30	"	"	PBJ	ISX		34	TC, SK	1/1	2	5
30	"	"	ISX	PBJ		35	TC, AP	1/1	2	5
30	"	"	PBJ	TEST		36	TC, GM, AP, 1 REPAIR	1/1	2	5
30	"	"	TEST	HPN		37	TC, GM, SK, AP, JULIE, SK, PASADOW, JULIE, SK	1/1	4	0
30	"	"	HPN	CMAH		38	TC, SK, GM, PASADOW, JULIE, SK, PASADOW, JULIE, SK	1/1	1	5
30	"	"	CMAH	PBJ		39	TC, SK	1/1	2	1
<p>Page Total: 76</p> <p>Amount Forward: 6485</p> <p>Total to Date: 6492</p>										

I certify that the statements made by me on this form are true.

Pilot's Signature

David R. Roberge

CONFIDENTIAL DR_000052

Date of Flight	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					BERNARD	HELD
4	C-421B	N908GM	ZORRO	SAF			101 LANDING, 2 MEN (LITHUANIAN PARTNERS)	1/1	5	
4	"	"	SAF	ZORRO			PATLANNON, 2 MEN (LITHUANIAN PARTNERS)	1/1	5	
4	"	"	ZORRO	ZORRO			2 DAILY VISITORS TAKING PICTURES OF 1000 RLY HOUSE	1/1	5	
30 DEC	B-727-31	N908JG	HPN	PBJ		33	JG, SK, GB, JP, KC	1/1	25	
4	"	"	PBJ	ISF		34	JG, SK	1/1	25	
4	"	"	ISF	PBJ		35	JG, AP	1/1	27	
9	"	"	PBJ	TEST		36	JG, GM, AB, 1 female	1/1	22	
13	"	"	TEST	HPN		37	JG, GM, SK, AP, GT, CM, CD	1/1	40	
15	"	"	HPN	CMH		38	JG, SL, 2 female, 2 male	1/1	15	
16	"	"	CMH	PBJ		39	JG	1/1	21	
17	"	"	PBJ	TEST		40	JG, GM, SK, 1 female	1/1	26	
26	"	"	TEST	TLPL		41	JG, GM, SK, AP, FUGUE PARTIAL, BOB ALSO	1/1	1	
26	"	"	TLPL	PBJ		42	JG, GM, SK, AP, FUGUE PARTIAL, BOB ALSO	0/0	36	
30 JAN	"	"	PBJ	TEST		43	JG, GM, AP, SK, 1 female	1/1	24	
11	"	"	TEST	GNR		44	JG, GM, SK, AP, ALEXIA WALLACE, GELBY, LORE	1/1	41	
13	G-1159B	N909JG	PBJ	MBPV		45	JG, GM, ROSS, WARTON, MARGARET, 1 female	1/1	26	
13	"	"	MBPV	PBJ		157	JG, GM	1/1	15	
14	B-727-31	N908JG	PBJ	LGA		46	JG, GM	1/1	17	
I certify that the statements made by me on this form are true.								Page Total	15	
								Amount Forward	84501	33.117
								Total to Date	214904	23.117

Pilot's Signature

David Redefine

CONFIDENTIAL DR_000053

Date 19 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					HELICOPTER	HELICOPTER
15	B-727-31	N908JE	LEG	BED		47	JE	1/1	1	
15	"	"	BED	HPN		48	JE, JE-SSILA		8	
17	"	"	HPN	TEST		49	JE, GM, SK, AP, CENDY LORER		3	4
20	"	"	TEST	PBI		50	JE, GM, SK, AP, CENDY LORER	1/1	2	6
22	"	"	PBI	HPN		51	JE, GM, SK, AP, CENDY LORER	1/1	2	5
25	"	"	HPN	PBI		52	JE, GM, SK, AP, CENDY LORER	1/1	2	7
27	"	"	PBI	TEST		53	JE, GM, SK, AP, CENDY LORER	1/1	2	4
30	"	"	TEST	JFK		54	JE, GM, SK, AP, CENDY LORER	1/1	3	7
31	"	"	JFK	PBI		55	JE, GM, SK, AP, CENDY LORER	1/1	2	8
9	"	"	PBI	MEA		56	JE, SK, AP		3	
9	"	"	MEA	HPN		57	JE, GM, SK, AP, CENDY LORER		2	6
10	"	"	HPN	LFPB		58	JE, GM, SK, AP, CENDY LORER	1/1	6	5
13	"	"	LFPB	ESSA		59	JE, SK	1/1	2	2
14	"	"	ESSA	LFML		60	JE, SK	1/1	2	4
15	"	"	LFML	EGGW		61	JE, SK		1	8
15	"	"	EGGW	BGR		62	JE, GM, SK	1/1	7	2
16	"	"	BGR	PBI		63	JE, GM, SK		3	5
18	G-11590	N908JE	PBI	ABY		1554	JE	1/1	1	4
18	"	"	ABY	PBI		1560	empty	1/1	1	1
Page Total							10	10	51	0
Amount Forward							6507	6507	8400	9
Total to Date							6517	6517	8541	9
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									33	112

I certify that the statements made by me on this form are true.

Pilot's Signature

F. David L. L. L.

CONFIDENTIAL DR_000054

Date	Aircraft Make and Model	Altitude Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ATP PLUM	GLIDER
2007 Feb 18	B-727-31	N908JC	PBI	ABY		64	TCM, SK, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1	1	3
18	"	"	ABY	JFK		65	JG CM, SK, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL		2	1
20	"	"	JFK	MRY		66	JG, SK, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1	5	9
23	"	"	MRY	VNY		67	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
23	"	"	MRY	VNY		68	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
23	"	"	VNY	JFK		69	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
25	G-1159B	N908JC	PBI PBI	ABY		70	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
25	"	"	TGB	ABY		71	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
28	B-727-31	N908JC	JFK	PBI		72	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
28	B-727-200	SPALUASOL	MED	MED		73	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
7	"	"	"	"		74	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
7	"	"	"	"		75	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
8	"	"	"	"		76	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
10	B-727-31	N908JC	TGB	JFK		77	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
14	"	"	JFK	PBI		78	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
17	"	"	PBI	JFK		79	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
19	"	"	JFK	EGGW		80	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
21	"	"	EGGW	JFK		81	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
22	"	"	JFK	PBI		82	PAVED ROUTE, GLEN DUBEN, 2 SCRAMBLES FOR MARE COOL	1		
I certify that the statements made by me on this form are true.										
Pilot's Signature								Page Total	82	86
								Amount Forward	6517	85419
								Total to Date	6526	33112

Pilot's Signature

Daniel Reddick

~~CONFIDENTIAL~~ DR 000055

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Hazards, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ACRANGE	HAZARD
2002 APR 1	B-727-31	N908JE	PBI	TIST	78	78	ICE, COM, SK, AP, 2 REMAINS FUEL LV	1/1	23	HAZARD
5	"	"	TIST	PBI	79	79	FUEL LV	1/1	27	
5	"	"	PBI	IAD	80	80	FUEL LV		21	
6	"	"	IAD	PBI	81	81	FUEL LV	1/1	23	
8	"	"	PBI	JFK	82	82	ICE, SK, HELICOPTER	1/1	25	HAZARD
20	B-727-200	SIMULAB	MFA	MFA			PRE-FLIGHT, TR LOSS, CSO LOW OIL PRESSURE AP, 2 REMAINS, FUEL LV, 2 REMAINS	1/1	20	
22	"	"	"	"			NO AP, STAY, LOSS OF ALL GEN, STAY STAY, STAY, FUEL LV, 2 REMAINS		20	
23	"	"	"	"			AP, STAY, STAY, STAY, STAY, STAY STAY, STAY, STAY, STAY, STAY, STAY		20	
24	"	"	"	"			STAY, STAY, STAY, STAY, STAY, STAY STAY, STAY, STAY, STAY, STAY, STAY		20	
25	"	"	"	"			STAY, STAY, STAY, STAY, STAY, STAY STAY, STAY, STAY, STAY, STAY, STAY		20	
26	"	"	"	"			STAY, STAY, STAY, STAY, STAY, STAY STAY, STAY, STAY, STAY, STAY, STAY		20	
27	B-727-31	N908JE	PBI	ABQ	90	90	ICE, COM, SK	1/1	32	
29	"	"	ABQ	JFK	91	91	ICE, COM, SK	1/1	24	
4	"	"	JFK	PBI	92	92	ICE, SK, HELICOPTER			
TOTALS REPORTED										
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I certify that the statements made by me on this form are true.

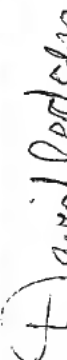
David Portera

Pilot's Signature

I certify that the statements made by me on this form are true.

CONFIDENTIAL DR_000057

Date +9 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Category	Sub-Category
2002 JUN 8	B-727-314	N908JC	EIDW	JFK		111	JG, GMSK	1/1	69	1XG-LIC-08
8	"	"	JFK	PBI		112	JG, SK	1/1	23	
12	G-1159B	N909JC	PBI	PBI		113	GMU FLIGHTS-SEAN RILEY, GAIL UNIVERSAL	1/1	27	
14	B-727-314	N908JC	PBI	BOS		113	REPOSITION		26	
14	"	"	BOS	TIST		114	JG, SK, GMSK, LOPEZ, LAUREN HANES		37	
16	"	"	TIST	JFK		115	JG, GMSK, GMSK, LOPEZ, LAUREN HANES	1/1	38	
19	G-1159B	N909JC	PBI	TIST		115	REPOSITION		32	
19	"	"	TIST	PBI		116	JG, GMSK, GMSK, LOPEZ, LAUREN HANES	1/1	25	
21	"	"	PBI	MKE		117	JG, GMSK, GMSK, LOPEZ, LAUREN HANES	1/1	1	
21	"	"	MKE	PBI		117	REPOSITION	0/0	12	
23	"	"	PBI	MKE		117	REPOSITION	0/0	11	
23	"	"	MKE	TGB		117	JG, GMSK, GMSK, LOPEZ, LAUREN HANES	1/1	29	
23	"	"	TGB	PBI		117	REPOSITION		25	
27	B-727-314	N908JC	JFK	LFPB		116	JG, GMSK, GMSK, LOPEZ, LAUREN HANES	1/1	71	
29	"	"	LFPB	LFTH		117	JG, GMSK, GMSK, LOPEZ, LAUREN HANES	1/1	13	
30	"	"	LFTH	LFPB		118	JG, GMSK, GMSK, LOPEZ, LAUREN HANES	1/1	15	
13	"	"	LFPB	LFPB		114	JG	0/0	12	
I certify that the statements made by me on this form are true.									Page Total	8/7 476
									Amount Forward	6534 86925 39 112 6


 Daniel P. Delo

CONFIDENTIAL DR_000058

Date -Mo- -Yr-	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Multi-Engine	Single-Engine
July 13, 2002	B-727-314	N908JG	LFMN	GMTJ		120	JG, GM, SK, AP, CINDY LOPEZ		2	1
13	"	"	GMMT	GMMC		121	JG, GM, SK, CL, AP			7
13	"	"	GMMT	LPAT		122	JG, GM, SK, AP, CL, PRESIDENT CLARENCE DOUGLASS, MEXICO, SECRET SERVICE		2	4
13	"	"	LPAT	JFK		123	JG, GM, SK, AP, CL, PRESIDENT CLARENCE DOUGLASS, MEXICO, SECRET SERVICE		5	8
18	"	"	JFK	PBI		124	JG, SKELLEY LEWIS, 2 FEMALE		2	2
19	"	"	PBI	JAX		125	KRISTY RODRIGUEZ GARCIA, HONOLULU, ALYSSA HANSEN - C CHECK		1	0
Aug 4	G-1159B	N909JG	PBI	MVY		126	JG, 1 FEMALE		2	0
4	"	"	MVY	BED		127	JG, 1 FEMALE			7
4	"	"	BED	TEB		128	JG, 1 FEMALE			9
5	"	"	TEB	SAF		129	JG, SK, 2 FEMALE	1/1	3	9
6	C-172XP	N739SP	ACG	ACG		130	172 CHECK OUT	3/3	9	
6	206L3	N474AW	ZORRO	ACG						
15	B-727-314	N908JG	JAX	JAX		126	C-CHECK FLIGHT TEST	1/1	9	
16	"	"	JAX	PBI		127	RETURN FROM C-CHECK		1	1
17	G-1159-B	N909JG	SAF	TEB		128	JG, GM, SK, CINDY LOPEZ, VICTORIA RUBEN, MEXICO, ALYSSA HANSEN, MEXICO, SECRET SERVICE		3	7
18	"	"	TEB	PBI		129	JG, VICTORIA RUBEN, 1 FEMALE		2	4
21	B-727-314	N908JG	PBI	TEB		130	JG, SKELLEY LEWIS		2	5
25	"	"	TEB	JFK		131	JG, SK	1/1	3	6
28	"	"	JFK	LFPB		132	JG, SK, CINDY LOPEZ, 1 FEMALE		6	4
I certify that the statements made by me on this form are true.									Page Total	5
									Amount Forward	8140
									33	112



 C. J. Anderson

CONFIDENTIAL DR 000059

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To					
2002 AUG 31	B-727-311H	N908JL	LFPB	EGBB		131	JT, NICOLE JUNKERMANN	1/1	APPALWHE GLIDER
SEP 2	"	"	EGBB	LFPB		132	JT, NICOLE JUNKERMANN		
3	"	"	LFPB	JFK		133	JT, SK, CEMDY LAPEZ,	1/1	
4	"	"	JFK	PBI		134	ANDREW BRUNEL JT, 1 FEMALE		
8	G-1159JB	N909JL	PBI	TBB		134A	JT, ANDREA, 2 FEMALES		
9	G-1159JB	"	TBB	BGM		134B	JT, STELLER LEWIS	1/1	
9	"	"	BGM	TBB		134C	JT, STELLER LEWIS		
10	"	"	TBB	TIST		134D	JT, STELLER LEWIS, A MALE		
15	"	"	TIST	PBJ		134E	JT, SK, DANE FLIGHTINATOR	1/1	
21	B-727-311H	N908JL	JFK	LPAZ		136	PRESTON WILLIAM J. EDWARDS, JR. (GIVEN BY PAULEY - CHARTER TUCKER, DE LOACH, SK, CL CHARLOTTE RAYNES AMANDA MORGAN, BOSS PAMMY, PHILIP SLAVE, JEAN KENNEDY, GREG NORMAN, ROBERT LUTHER CRISTY, LINDA WASSERMAN, RON PURCELL, GARY ANDREWS) SANG AS ABOVE LESS RUN BURKLE		
22	"	"	LPAZ	DGAZ		137	SAME AS ABOVE PLUS ISRA MALATZAR		
23	"	"	DGAZ	DNAZ		138	SAME AS ABOVE		
24	"	"	DNAZ	HRYR		139	SAME AS ABOVE		
25	"	"	HRYR	FQMA		140	SAME AS ABOVE		
26	"	"	FQMA	FACT		141	SAME AS ABOVE	1/1	
27	"	"	FACT	FAJS		142	SAME AS ABOVE LEFT TO CM, SK, CL CHARLOTTE RAYNES, ANDREW MORGAN SUNG AS ABOVE LESS GARY ANDREWS		
28	"	"	FAJS	FACT		143	SAME AS ABOVE LESS GARY ANDREWS JEAN MARGARET ENOZ		
29	"	"	FACT	DGAZ		144	SAME AS ABOVE PLUS ISRA MALATZAR ON AIR		
29	"	"	DGAZ	LFPB		145	SAME AS ABOVE	1/1	

I certify that the statements made by me on this form are true.

[Signature]

Page Total	5/6	625
Amount Forward	653	87841
Total to Date	658	88466

I certify that the statements made by me on this form are true.

Pilot's Signature _____

David Sadler

I certify that the statements made by me on this form are true.

CONFIDENTIAL DR_000062

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ACRANGE	HEADING
2003										
2003	10510	N41010	PBI	PBI			TEST FLIGHT - 10000 FT. CIRCLE	1	5	
13	10510	N41010	PBI	JFK			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
17	"	"	JFK	PBI			TEST FLIGHT - 10000 FT. CIRCLE	1	3	
22	"	"	PBI	TIST			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
25	"	"	TIST	PBI			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
26	"	"	PBI	JFK			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
26	10510	N41010	PBI	TIST			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
31	"	"	TIST	PBI			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
31	10510	N41010	JFK	PBI			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
3	"	"	PBI	JFK			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
7	"	"	JFK	PBI			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
11	"	"	PBI	TIST			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
12	"	"	TIST	LEGR			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
13	"	"	LEGR	LFB			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
17	"	"	LFB	CYQX			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
17	"	"	CYQX	PBI			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
23	"	"	PBI	JFK			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
25	"	"	JFK	MRY			TEST FLIGHT - 10000 FT. CIRCLE	1	2	
LIMITED LOGBOOK ENTRIES										
Page Total								109	11	
Amount Forward								109	11	

I certify that the statements made by me on this form are true.

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I certify that the statements made by me on this form are true.

CONFIDENTIAL

CONFIDENTIAL DR_000063

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ADP/DAG (GL) DCA	HELING
10/2/03	B-727-31H	N908JE	MRY	ABQ		184	JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD		1	10
11/4/03	"	"	ABQ	JFK		185	JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD		3	5
11/5/03	"	"	JFK	PBI		186	JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD		2	8
12/12/03	B-727-200	SPRING SERVICE SIMULATED	MIA	LCL			HOLDING		2	5
12/13/03	"	"	"	"					2	5
12/13/03	"	"	"	"					2	5
12/17/03	G-159B	N904JG	PBI	TJB			JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD		2	4
12/19/03	"	"	TJB	PBI		187	JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD	1/1	1	0
12/19/03	"	"	BCE	TJB			JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD		1	1
12/20/03	"	"	TJB	PBI			JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD		2	8
12/21/03	"	"	PBI	MYNN			JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD	1/1	1	0
12/23/03	"	"	MYNN	PBI		185	JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD		1	8
12/25/03	B-727-31H	N908JE	PBI	JFK		187	JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD		2	5
12/27/03	"	"	JFK	TJB		188	JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD		3	3
12/28/03	"	"	TJB	SOGR		189	JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD		6	4
12/29/03	"	"	SOGR	GUAC		190	JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD		6	2
12/30/03	"	"	GUAC	LFPB		191	JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD	1/1	5	2
12/31/03	"	"	LFPB	CYOK		192	JE GMSK, JEMMY JAYLER, BRENT MICHAEL BLANCHARD		5	4
I certify that the statements made by me on this form are true.									Page Total	3/3
									Amount Forward	9015
									Total to Date	9071
									3/3	113
									3/3	113

Pilot's Signature

F and code for

Pin's Studio
Friedrich

CONFIDENTIAL DR 000065

[illegible]

cedify that the statements made by me on this form are true.

Pilot's Signature _____

Daniel Rodgers

I certify that the statements made by me on this form are true.

CONFIDENTIAL DR_000067

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To				AIRPLANE	GLIDER
2003	13-727-200	SEAVULSTON	MIA	MIA		RECEIVED 2/1/03 - EXAMINED		2	0
27	C-172	N5279X	LNA	LNA		DAVID - Safety check, Pallet, 1000 lbs	3/3	5	
29	G-1159B	N909JC	PBI	"		2/2	2/2	8	
30	"	"	T&B	PBI	1655	GM		2	4
31	"	"	PBI	T&B	1655	AM, FRAM, PAULA, EPS, EN		2	6
2	BH-467	N491GM	PBI	MTN	1655	IC, AM, SK, TD, VC	V1	2	5
2	BH-467	N491GM	MYEF	MDPV		LARRY VICKS			
3	"	"	MDPV	MDPC		LV			
3	"	"	TEST	TEST		LV			
3	G-1159B	N909JC	T&B	PBI	1657	IC, AM, SK, TD		2	6
6	"	"	PBI	BED	1658	IC, AM, SK, TD	1/1	2	8
7	"	"	BED	T&B	1659	IC, SK		1	0
11	"	"	T&B	PBI	1670	IC, BT, GM, TD, CROSSLIN	1/1	2	7
14	"	"	PBI	T&B	1671	IC, BT, GM, SK		2	5
16	"	"	T&B	PBI	1672	IC, BT, AM, SK		2	6
19	"	"	PBI	T&B	1673	IC, AM, BT, SK	1/1	2	7
21	"	"	T&B	MTN	1674	IC, SK	1/1	7	
21	"	"	MTN	TEST	1675	IC, BT, SK, CROSSLIN	1/1	3	6
I certify that the statements made by me on this form are true.							Page Total	11/10	5
							Amount Forward	91958	331197
							Total to Date	92275	331250

Pilot's Signature

David Redgrave

CONFIDENTIAL DR_000068

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks - Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					A2K00000	GUIDE
2003										
26	G-1159B	N909JE	TEB	TEB		1676	JC, AM, SK, TO, LC		3	9
26	"	"	TEB	MIV		1677				9
27	B-727-31H	N908JE	JAX	JAX		220		✓	1	4
28	"	"	JAX	PBI		221			1	0
30	"	"	PBI	JFK		222			2	5
30	"	"	JFK	LFPB		223	JC, AM	✓	6	9
Nov	"	"	LFPB	GBBR		224	JC, AM, SK			9
4	"	"	GBBR	ENG M		225	JC, AM, (JUL BAND G.M., HAZARD, SQUAWK PREPARED AT BELL CLETON, 2K)		1	8
4	"	"	ENG M	GSSA		226	JC, AM, G.M., SK			9
5	"	"	GSSA	ENG M		227	JC, AM, G.M., SK	✓		9
5	"	"	ENG M	UNNT		228	JC, AM, G.M., SK, (DOWS BAND, 4 SEAS, SQUAWK PREPARED AT BELL CLETON)	✓	5	3
6	"	"	UNNT	VHAY		229	JC, AM, G.M., SK, (DOWS BAND, 4 SEAS, SQUAWK PREPARED AT BELL CLETON)	✓	6	5
9	"	"	VHAY	ZUUU		230	JC, AM, G.M., SK, (DOWS BAND, 4 SEAS, SQUAWK PREPARED AT BELL CLETON)		2	4
9	"	"	ZUUU	ZBAA		231	JC, AM, G.M., SK, (DOWS BAND, 4 SEAS, SQUAWK PREPARED AT BELL CLETON)		2	2
11	"	"	ZBAA	PANC		232	JC, AM, G.M., SK, (DOWS BAND, 4 SEAS, SQUAWK PREPARED AT BELL CLETON)	✓	7	8
11	"	"	PANC	JFK		233	JC, AM, SK	✓	6	3
14	"	"	JFK	PBI		234	JC, AM, SK, (DOWS BAND, 4 SEAS, SQUAWK PREPARED AT BELL CLETON)		2	5
18	"	"	PBI	JFK		235	JC, AM, SK, (DOWS BAND, 4 SEAS, SQUAWK PREPARED AT BELL CLETON)	✓	2	6
21	"	"	JFK	CMH		236	JC, SK		1	5
Total								6/4	9227	582
Amount Forward								6728	33	125
Total to Date								6734	33	125

I certify that the statements made by me on this form are true.

Pilot's Signature: *David D. Dwyer*

CONFIDENTIAL DR 0000069

[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature

Fairford

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Manuevers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRPLAN	HELICOPTER
2004 JAN 20	B-727-314	N908JK	PBI	JFK		243	IC, BT, NM, SK, TD		2	6
23	"	"	JFK	PBI		244	IC, BT, CHAUNTA DAVES, TD, NM, ALAN WEBER, MEIRAVETZ		2	6
26	G-1159B	N909JK	PBI	TEB		1691	IC, BT, NM, TD	1	2	4
28 FEB	"	"	TEB	TIST		1692	IC, BT, NM, SK, TD		3	6
5	"	"	TIST	TEB		1693	IC, BT, NM, TD, SK, ALAN WEBER	1	4	1
5	"	"	TEB	BEO		1694				8
5	"	"	BEO	TEB		1695	ALAN WEBER, TD		1	1
5	"	"	TEB	PBI		1696	IC, AD, SK		2	6
9	B-727-314	N908JK	PBI	JFK		245	IC, BT, SK	1	2	5
12	"	"	JFK	LFPB		246	IC, GM, JLB, ALAN WEBER, NM, KETA		7	0
17	"	"	LFPB	BGR		247	IC, GM, JLB, NM, TD, AW		6	9
17	"	"	BGR	JFK		248	IC, GM, JLB, TD, NM, AW		1	5
19	"	"	JFK	PBI		249	IC, BT, NM, SK, TD		2	4
22	"	"	PBI	JFK		250	IC, BT, NM, TD, AW	1	3	0
24	"	"	JFK	MR4		251	IC, SK, TD, NM, FOREST SAWYER		5	9
27	"	"	MR4	VNY		252	IC, NM, SK, TD	1	8	
29 MAR	"	"	VNY	ABQ		253	IC, NM, SK, TD		1	6
1	"	"	ABQ	JFK		254	IC, GM, NM, SK, TD	1	3	4
3	"	"	JFK	PBI		255	IC, NM, TD, VALSON CORREY		2	5
I certify that the statements made by me on this form are true.									Page Total	573
									Amount Forward	93315
									Total to Date	33125

CONFIDENTIAL DR_000070

Daniel Pedalino

CONFIDENTIAL DR_000071

Date 19- 2004	Altitude Make and Model	Altitude Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Altitude Category...	
			From	To					AIRPORT	HEIGHT
8	G-1159B	N904JE	PBI	TGB		167	JE, NM, TD	✓	2	8
9	"	"	TGB	BGD		168	JE, TD	✓	8	
11	"	"	BGD	TGB		169	JE, TD	✓	1	1
13	"	"	TGB	PBI		170	JE, TD, SK, NM	✓	2	6
17	B-727-200	SPMUL-000	PBI	TIST		171	JE, TD, SK, VC, NM	✓	2	3
17	"	"	MDA	MDA			LARRY SUMMERS	✓	2	0
17	"	"	MDA	MDA			HOLDING - LARRY SUMMERS	✓	2	0
18	"	"	MDA	MDA			FLIGHT - RING	✓	2	0
18	"	"	MDA	MDA			HANK COLLIER	✓	2	0
19	G-1159B	N904JE	MDA	MDA			REY BARRERA	✓	3	0
31	B-727-31A	N908JE	TIST	PBI		172	JE, SK, TD, VC	✓	3	0
6	G-1159B	N904JE	PBI	JFK		236	JE, NM, TD	✓	2	3
11	B-727-31A	N908JE	PBI	TIST		257	JE, ILB, NM, TD	✓	2	5
15	"	"	JFK	JFK		175	JE, BT, NM, SK, TD	✓	2	3
16	"	"	BGD	PBI		238	JE, BT, CD, EA, TD, NM, TD	✓	2	4
19	"	"	PBI	JFK		259	JE, SK, LARRY SUMMERS	✓	9	
22	"	"	JFK	PBI		260	JE, SK	✓	2	6
	"	"	PBI	JFK		261	JE, SK, JENNIFER	✓	2	6
	"	"	JFK	PBI		262	JE, BT, MARK SPSTEIN, NM	✓	2	5
							TD, JAMES, GM	✓	4	3
Page Total									9388	33125
Amount Forward									6759	33125
Total to Date									9431	33125

I certify that the statements made by me on this form are true.

Pilot's Signature


CONFIDENTIAL DR_000072

Date +9	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					HERPANE	WEDDEL	
2003 APR 27	B-72-31A	N908SC	PBI	JFK		263	36, BT, NM, TD		22		
MAY 1	"	"	JFK	PBI		264	36, NM, SK		26		
4	"	"	PBI	JFK		265	36, NM, SK		24		
5	"	"	JFK	LFPB		266	36, NM, NM, SK		69		
8	"	"	LFPB	EGGW		267	36, NM, NM, SK		9		
10	"	"	EGGW	LKPR		268	36, NM, NM, SK		18		
12	"	"	LKPR	LFPB		269	36, NM, NM, NM		14		
14	"	"	LFPB	CYQX		270	36, NM, SK		58		
14	"	"	CYQX	PBI		271	36, NM, SK		42		
15	G-189B	N904JG	PBI	PBI		170	RON		7		
17	"	"	PBI	TGB		1708	36, BT, NM, TD		32		
21	"	"	TGB	PBI		1709	36, BT, NM, TD		24		
24	"	"	PBI	TGB		1710	36, NM, SK, TD		26		
31 JUN 4	"	"	TGB	TGB		1711	36, NM, SK, TD MANEUVER, SLICKERS		42		
4	"	"	TGB	HVN		1712	BT		5		
4	"	"	HVN	PBI		1713	36, BT, MS, NM, TD		27		
7	"	"	PBI	TGB		1714	36, BT, MS, NM, TD		25		
9	"	"	TGB	BEO		1715	36, MS, SK		9		
9	"	"	BEO	TGB		1716	36, MS, SK		8		
I certify that the statements made by me on this form are true.									77	487	
Pilot's Signature David Redafer									6754	94311	33125
Total to Date									6756	94798	33125

Pilot's Signature

David Reddy

Anderton.

Fi and Rodex

CONFIDENTIAL DR_000075

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AB	GL
16	B-72-31H	N909JE	TEST	PBI		350	JE, NM, SK, DM	1	2	4
17	"	"	PBI	JEK		351	JE, NM, SK, DM	1	2	5
20	"	"	JEK	LFPB		352	JE, NM, SK, DM	1	6	8
25	"	"	LFPB	JEK		353	JE, NM, SK, DM	1	7	6
25	"	"	JEK	JAX		354	JE, NM, SK, DM	1	2	1
29	G-1159B	N909JE	PBI	TEB		1721	JE, NM, SK, DM	1	2	6
29	"	"	TEB	PBI		1722	JE, NM, SK, DM	1	2	3
1	BHT-467	N491GM	PBI	TEST		1723	JE, NM, SK, DM	1	2	6
1	"	"	TEST	LSS			JE, NM, SK, DM	1		
2	G-1159B	N909JE	TEST	TEB		1724	JE, NM, SK, DM	1	4	0
7	G-1159B	SENWARR	DFW	DFW			JE, NM, SK, DM	1	4	0
8	"	"	"	"			JE, NM, SK, DM	1	4	0
9	"	N909JE	PBI	TEB		1725	JE, NM, SK, DM	1	2	7
10	"	"	TEB	PBI		1726	JE, NM, SK, DM	1	2	4
14	"	"	PBI	ABY		1727	JE, NM, SK, DM	1	1	3
14	"	"	ABY	TEB		1728	JE, NM, SK, DM	1	2	1
16	"	"	TEB	BED		1729	JE, NM, SK, DM	1	8	
16	"	"	BED	TEB		1730	JE, NM, SK, DM	1	8	
I certify that the statements made by me on this form are true.									4/3	510
									6183	95874
									6181	96384
									6462	96384

Pilot's Signature

David Rodriguez

CONFIDENTIAL DR_000076

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To						
18 NOV 2004	G-1154B	N909JE	TEB	PBI		146	JE, NM, SK, DM, LV		23	AIRPORT GULF HEC
20	B-727-31H	N9108JE	JAX	PBI		355	JE, NM, SK, DM, LV		26	
20	"	"	JAX	PBI		356	JE, NM, SK, DM, LV		10	
23	"	"	PBI	TEST		357	JE, NM, SK, DM, LV		23	
26	G-1154B	N909JE	PBI	TEST		144	GM, JK LV		24	
28	B-727-31H	N9108JE	TEST	JFK		310	JE, NM, SK, DM, SK, DM, SH, LV		40	
28	"	"	JFK	PBI		314	JE, NM, SK, DM, LV		28	
14	B-727-200	52MOLATOL	MED	MED			HANK COLLEGE - INSTRUCTOR		10	
15	"	"	"	"			HANK COLLEGE - INSTRUCTOR		17	
15	"	"	"	"			HANK COLLEGE - INSTRUCTOR		17	
21	G-1154B	N909JE	PBI	TEST		146	JE, NM, SK, DM, GM		23	
29	"	"	TEST	TNLM		144	JE, NM, SK LV		7	
29	"	"	TNLM	TEST		147	JE, NM, SK LV		7	
30	B-727-407	N911GM	TEST-LSJ	TEST			JE, NM, SK, DM, NM LV			
30	"	"	LSJ	TEST			JE, NM, SK, DM, NM LV			
30	G-1154B	N909JE	TEST	TQPF		144	JE, NM, SK, DM, NM LV		6	
1	"	"	TQPF	PBI		144	JE, NM, SK, DM, NM LV		32	
3	"	"	PBI	TEB		170	JE, NM, SK, DM, NM LV		27	
6	"	"	TEB	PBI		171	JE, NM, SK, DM, NM LV		27	
Page Total									35	5
Amount Forward									939	4
Total to Date									9613	9

I certify that the statements made by me on this form are true.

F. J. J. J. J.

CONFIDENTIAL DR_000077

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ATIS/LOC	GP/DCR
29-2-2005	G-1159B	N909JC	PBI	RSW		172	LV		6	
8	"	"	RSW	PBI		145	LV	1/1	6	
11	B-727-311	N908JC	PBI	TIST		310	LV		25	
14	"	"	TIST	PBI		311	LV		28	
27	"	"	PBI	TIST		315	LV		23	
31	"	"	TIST	IFK		316	LV		38	
3	"	"	IFK	CMH		317	LV	1/1	14	
3	"	"	CMH	PBI		318	LV		22	
7	"	"	PBI	IFK		319	LV		25	
10	G-1151B	N901JC	PBI	PBI		173	GR	1/1	11	
14	"	"	PBI	TIST		175	GR	1/1	24	
14	"	"	TIST	PBI		174	GR		27	
24	B-727-311	N908JC	PBI	PBI		324	LV		5	
24	"	"	PBI	IFK		325	LV	1/1	24	
6	B-727-200	51MULAS	MEA	MEA			LV		20	
7	"	"	MEA	MEA			LV		25	
8	G-1151B	N901JC	PBI	SAN		173	GM	1/1	56	
13	"	"	SAN	MDW		178	GM	1/1	35	
14	"	"	MDW	TAB		176	GM	1/1	17	
Total									431	
Amount Forward									96739	33111
Total to Date									97170	33111

I certify that the statements made by me on this form are true.

Daniel D. Duda

I certify that the statements made by me on this form are true.

Edward O. Blevins

David L. Latham
Dilute Singsong

David Rodriguez

Pilot's Signature: Fixed Cost

Mader/Stadler


Pilot's Signature David Rodgers

From

Matter 150-100-100

Pilot's Signature David Rodgers

Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		SEL	MEL
			From	To					ATPL/PLN/CLD/OSZ	HELICOPTER		
2006 JUL 16	B-727-31H	N908JE	EGGW	LFPB		386	JE, GM, SK		1	0		10
20	"	"	LFPB	JFK		387	JE, SK	1/1	7	7		77
22	"	"	JFK	PBI		388	JE, SK, JK, JOWIA STARODUNOV		3	0		30
23	G-1159B	N909JE	PBI	TIST		1896	JE, SK, JK, JOWIA STARODUNOV		2	6		26
23 AUG 16	"	"	TIST	EGW		1897	JE, SK, JK, JOWIA STARODUNOV		3	6		36
17	"	"	TEB	EGGW		1898	JE, SK, JK, JOWIA STARODUNOV	1/1	6	5		65
19	"	"	EGGW	LEIB		1899	GM	1/1	2	5		25
25	"	"	LEIB	EGGW		1900	GM		2	3		23
28	"	"	EGGW	LFTH		1901	GM	1/1	1	7		17
28 SEP 1	"	"	LFTH	LFBE		1902	GM, KEVIN MAXWELL, LADY ROSEN, JAMES KEE	1/1	1	2	CONFIDENTIAL	DR_000084
2	"	"	LFBE	EGGW		1903	GM, KEVIN MAXWELL, LADY ROSEN, JAMES KEE	1/1	1	5		15
2	"	"	EGGW	EGPH		1904	GM, KEVIN MAXWELL, LADY ROSEN, JAMES KEE	1/1	1	0		10
22	B-727-31H	N908JE	EGPH	CYQX		1905	GM, KEVIN MAXWELL, LADY ROSEN, JAMES KEE	1/1	4	5		45
22	"	"	CYQX	TEB		1906	GM	1/1	2	8		28
22	"	"	TEB	MTA		398	JE, DIANA BURAS, JOWIA STARODUNOV	1/1	2	5		25
23	"	"	MTA	TIST		399	JE, DIANA BURAS, JOWIA STARODUNOV	1/1	2	5		25
24	G-1159B	N909JE	TIST	VQQ		400	JE, DIANA BURAS, JOWIA STARODUNOV	1/1	2	9		29
24 OCT 2	"	"	VQQ	TIST		1905	GM, KEVIN MAXWELL, LADY ROSEN, JAMES KEE	1/1	3	6		36
2	"	"	TIST	BEA		1906	JE, DIANA BURAS, JOWIA STARODUNOV	1/1	3	9		39
I certify that the statements made by me on this form are true.												
<div style="text-align: right;">  David Rodriguez Pilot's Signature </div>												
<div style="text-align: right;"> Page Total Amount Forward Total to Date </div>								<div style="text-align: right;"> 12 / 11 6918 6450 6860 </div>				
								<div style="text-align: right;"> 33 / 32 7 33 / 32 7 </div>				

suotnurtnu

Matter: Subtitle

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		...and Class
			From	To					APPLANCE	GLIDER	
2006 OCT 2	G-1159B	N909JE	BED	T&B		1957	JE, NADIA MARCELOVA, SARAH KILIAN, LV		9		S&L MEL
6	"	"	T&B	TIST		1908	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV		44		4
26	"	"	TIST	T&B		1913	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV	1/1	42		4
27 NOV B	"	"	T&B	TIST		1914	JE, BARBARA MOSKOW, LANCE CALLOWAY, BA		34		3
9	"	SMU47 OR	DFW	DFW		405	JE, NADIA MARCELOVA, SARAH KILIAN, BA		40		4
13	B-727-31H	N908JE	ABQ	TIST		406	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV	1/1	49		4
20	"	"	TIST	EWB		407	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV		37		3
21	"	"	EWB	ABQ		408	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV		43		4
25	"	"	ABQ	TIST		409	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV		51		5
27	BHT-407	N491GM	PBI	FXE		410	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV		CONFIDENTIAL	BR 000085	
27	"	"	FXE	PBI		411	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV		5		
DEC 1	B-727-200	SMU47 OR	MIA	MIA		412	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV		20		2
10	G-1159B	N909JE	EWB	TIST		413	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV		20		2
14	"	"	TIST	EWB		414	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV		34		3
21	"	"	EWB	PBI		415	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV		39		3
21	"	"	PBI	ISP		416	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV		25		2
2007 JAN 7	B-727-31H	N908JE	TIST	EWB		417	JE, LANCE CALLOWAY, NADIA MARCELOVA, LV		39		3
I certify that the statements made by me on this form are true.											
Pilot's Signature								Page Total	591	10	
								Amount Forward	13,061	3	2176 8788
								Total to Date	13,061	4	2176 8794

David Rodriguez

suojjnujsuj

Walter J. J. J.

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Flights Flown No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	SEL	MEL
2007	B-727-31H	N908JE	From To	417	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		3 3		3
16	"	"	TIST BED	418	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		3 7		3
16	"	"	BED ENR	419	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		1 2		1
20	"	"	ENR LFPB	420	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM	1	6 7		6
21	"	"	LFPB EDDM	421	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		1 4		1
22	"	"	EDDM LFPB	422	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		1 6		1
27	"	"	LFPB ENR	423	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		7 6		7
31	"	"	ENR TIST	424	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		3 3		3
11	BAT-407	N491GM	TIST LST		JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM	1			
12	B-727-31H	N908JE	TIST BED	425	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		3 0	CONFIDENTIAL DR 000086	3
12	"	"	BED ENR	426	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		1 0		1
20	"	"	TIST ENR	428	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		4 0		4
20	G-1159B	N909JE	ISP ENR	429	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		9		3
22	"	"	ENR TIST	430	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		3 5		4
27	"	"	TIST ENR	431	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM	1	4 1		
27	"	"	ENR ISP	432	JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		6		2
MAR	B-727-200	S3 MULATOC	MFA MFA		JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		2 0		1
2	"	"	MFA MFA		JE, IZ, WALTER CROWLEY, NM, SK, LE, JOHN AMERSON, LM		1 5		5
Page Total							50 3		2
Amount Forward							10 20 4	33 133	7
Total to Date							10 20 7	33 133	9

I certify that the statements made by me on this form are true.

Pilot's Signature *D. J. J.*

Daxelbridge

Pilot's Signature _____

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		SEL	Class
			From	To					ATC/ME	GUIDEL		
2007	BH-41510	FTD	BELLTX	BELLTX			FADEL TRAINING					
5-6-03	"	"	BELLTX	BELLTX			STUAL RECORDS, EXCESS PITCH, CABLE RELEASE					
2007	SK-76C+	SPMUL0708	PBE	PBE			ON-BOARD AUTO ROTATIONS, CABLE RELEASE					
10	"	"	PBE	PBE			SETBACKS WITH POWER, DUAL SENSORS FAILURE, EXCESS PITCH, EXCESS FAILURE, NO TOTAL REAR AVIATOR # TRANS					
19	B-727-31H	N908JE	EWB	TIST	450							
22	"	"	TIST	CMH	451							
23	"	"	CMH	EWB	452							
25	"	"	EWB	MIA	453							
26	"	"	TIST	EWB	457							
19	G-1159B	N909JE	CYXU	CYXU	1935		EMERGENCY - BLOW NOSE GEAR DOWN					
20	"	"	CYXU	PTK	1936							
21	B-727-31H	N908JE	EWB	EWB	460							
22	"	"	EWB	TIST	461							
22	"	"	TIST	MIA	462							
23	B-727-200	SPMUL0808	MIA	MIA			HAL LETO JOE GLASSON FE RECURRENT					
24	"	"	MIA	MIA			JOE GLASSON - FC FC					
30	G-1159B	N909JE	TIST	TAB	1940		HAL LETO JOE GLASSON					
31	"	"	TAB	MIA	1941							
31	B-727-31H	N908JE	MIA	EWB	463							
I certify that the statements made by me on this form are true.												
Pilot's Signature: <i>Daniel Rodriguez</i>												
Page Total: 6/5												10 0
Amount Forward: 10200 6												3 3 155 6
Total to Date: 10238 2												3 3 165 6
												2176 8 802
												2176 8 801

suojipmijul

all-ops-19153

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		and Class		H2524
			From	To					Aircraft	Category	SEL	MEL	
2007 Aug 12	BHT-407	N491GM	TIST	TIST									3
13	B-727-31H	N908JE	TIST	EWB	465	465			37			37	3
15	G-1159B	N909JE	MIA	PBI	1402	1402				5		5	5
16	B-727-31H	N908JE	EWB	VNY	466	466				54		54	54
16	"	"	VNY	ABQ	467	467				17		17	17
21	"	"	ABQ	MIA	468	468				36		36	36
21	"	"	MIA	TIST	469	469				25		25	25
27	"	"	TIST	EWB	470	470				37		37	37
29	G-1159B	N909JE	PBI	T&B	1413	1413		1/1	25			25	25
30	"	"	T&B	HPN	1444	1444			5			5	5
30	"	"	HPN	TIST	1445	1445			37	CONFIDENTIAL	DR_000089	37	37
30	B-727-31H	N908JE	EWB	PBI	471	471			24			24	24
18	G-1159B	N909JE	TIST	T&B	1455	1455			36			36	36
30	B-727-31H	N908JE	TIST	EWB	474	474			36			36	36
30	"	"	EWB	LFPB	475	475			70			70	70
12	"	"	LFPB	LPAZ	476	476			33			33	33
12	"	"	LPAZ	TIST	477	477			54			54	54
15	"	"	TIST	EWB	478	478			37			37	37
18	G-1159B	N909JE	T&B	BEO	1452	1452		1/1	10			10	10
										Page Total			3
										Amount Forward			3165 6
										Total to Date			33165 9

I certify that the statements made by me on this form are true.

David Ledez

Pilot's Signature

From

MAJOR, SIGNATURE

SURJONJISUJ

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		...and Class		Helicopter
			From	To				Assigning	Category	SEL	MEL	
2007 Oct 18	G-1159B	N909JE	BED	TIST	1957	BH		35		SEL	MEL	35
25	"	"	EWRE	TIST	1957	LV		36				36
26	B-727-31H	N908JE	EWRE	VQQ	479	BH		23				23
Nov 6	G-1159B	N909JE	TIST	TGB	1912	LV	1/1	46				46
8	"	"	TGB	TIST	1913	LV		38				38
15	"	"	TGB	TIST	1913	BH		36				36
17	"	"	TIST	BED	1913	BH	1/1	39				39
17	"	"	BED	TGB	1919	BH	1/1	9				9
21	"	"	TGB	TIST	1970	BH		35				35
26	"	"	TIST	TGB	1971	LV		41		CONFIDENTIAL DR 000090		41
Dec 2	"	SIMULATED	DFW	DFW		HOLDING		40				40
3	"	"	"	"		NEGATIVE - INSURANCE BRIGHT KIDNEY - CROW GUY FLYING - CROW BRIGHT KIDNEY - CROW		30				30
11	"	N909JE	TIST	TGB	1976	LV		40				40
13	"	"	TGB	PWM	1977	LV	1/1	10				10
14	"	"	PWM	BED	1978	LV		8				8
14	"	"	BED	TGB	1979	LV		11				11
14	"	"	TGB	MIA	1980	LV		28				28
18	"	"	TIST	PBI	1982	LV	1/1	28				28
18	"	"	PBI	TGB	1983	LV		24				24
<p>Page Total</p> <p>Amount Forward</p> <p>Total to Date</p>							5/5	55		2176	8819	2514
							6881	16296		2176	8819	2514
							6886	16351		2176	8819	2514
							6483					

I certify that the statements made by me on this form are true.

Pilot's Signature: David L. Ladd

suojonjtsu/

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Manoeuvres, Endorsements	Number of Landings	Aircraft Category...		...and Class	
			From	To					ATIS/UNCL	GLIDE	WATER/GR	SEL
2007	G-1159B	N909JE	TEB	TIST		1994	LV		35			35
2008	"	"	TIST	TEB		1995	LV	1/1	39			39
2009	"	"	TEB	TIST		1996	LV		35			35
16	B-727-200	SIMULATOR	MIA	MIA					20			20
16	"	"	"	"					20			20
17	"	"	"	"					20			20
18	"	"	"	"					20			20
26	G-1159B	N909JE	EWB	TEB		1991	LV		5			5
5	"	"	TIST	TEB		1993	BA	1/1	42			42
8	"	"	TEB	SAF		1994	BA		40	CONFIDENTIAL DR_000091		44
12	"	"	SAF	MIA		1995	LV	1/1	37			37
13	"	"	MIA	TEB		1996	BA		24			24
15	"	"	TEB	TIST		1997	BA		34			34
24	"	"	TIST	TEB		1998	BA		40			40
27	"	"	TEB	BED		1999	LV		9			9
27	"	"	BED	TEB		2000	LV		10			10
29	"	"	TEB	TIST		2001	LV		35			35
6	B-727-314	N908JE	VQG	VQG		483	BA		16			16
8	G-1159B	N909JE	TEB	BED		2003	BA		8			8
I certify that the statements made by me on this form are true.								3/2	493			49
Page Total								6885	10351	33165	9	2176 88174
Amount Forward								6885	104004	33165	9	2176 88223
Total to Date								6885				

Pilot's Signature

David Rodriguez

suojnrujsu

FROD

MAY 2019

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		and Class	
			From	To					BIPLANE	GLIDER HELICOPTER		
2008 MAY 8	G-1154B	N909JE	BED	TEB		2004	BH		1	0	SEL MEL	
8	"	"	TEB	ACY		2005	BH		6			
9	"	"	ACY	TEB		2006	BH	1/1	7			
10	B-727-314	N908JE	VQQ	LCQ		081	BH		4			
16	G-1154B	N909JE	TIST	EWB		2010	LV		42		4	
21	"	"	EWB	SSI		2011	LV		20		2	
21	"	"	SSI	TIST		2012	LV		29		2	
24	"	"	TIST	TEB		2013	LV	1/1	37		3	
25	S-76	N908GM	MAS	RWI			LV		24	24	2	
25	S-76	N908GM	RWI	HXD			LV		CONFIDENTIAL	PR 000092		
26	"	"	HXD	DAB			LV		2			
26	"	"	DAB	PBI			LV		1	4		
28	G-1154B	N909JE	TEB	TIST		2014	LV		35			
APR 4	"	"	TIST	TEB		2016	BH		34			
15	"	"	TIST	TEB		2017	LV	1/1	37			
17	"	"	TEB	ENN		2018	LV		61			
18	"	"	ENN	LFPB		2019	LV		16			
22	"	"	LFPB	LLBG		2020	LV	1/1	42			
25	"	"	LLBG	LGR		2021	LV		15			
Page Total								4/3	395	75		
Amount Forward								6891	10400	4	33165	9
Total to Date								6891	10400	9	33173	4
								6488	10439	9	33173	4

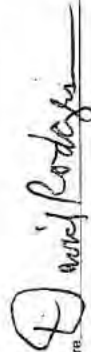
I certify that the statements made by me on this form are true.

Pilot's Signature
David Rodger

Pilot's Signature

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		...and Class	
			From	To					AIRRAAF CLASS	HELIUM	SEL	MEL
2006	G-1159B	N909JE	LGIR	LFPB		2022	LV		3	4		3
2006	"	"	LFPB	CYJT		2003	LV	1/1	5	8		5
2006	"	"	CYJT	TEB		2024	LV	1/1	2	5		2
2006	"	"	TEB	TEB		2008	BH	1/1	4	1		4
2006	"	"	TEB	TIST		2009	LV		3	5		3
2006	BHT-467	N491GM	LSS	TIST			LV					
2006	"	"	LSS	LSS			NVA					
2006	G-1159B	N909JE	TIST	TEB		2030	LV	1/1	3	8		3
2006	B-727-31H	N908JE	PBI	LCQ		483	BH					
2006	G-1159B	N909JE	TEB	MIV		2031	BH					
2006	B-727-31H	N908JE	LCQ	VQQ		484	BH					
2006	G-1159B	N909JE	TIST	PKD		2034	BH	1/1	3	9		3
2006	"	"	PKD	TEB		2035	BH	1/1	1	9		1
2006	B-727-31H	N908JE	VQQ	PBI		485	BH					
2006	B-727-200	SIMULATOR	MIA	MIA			LV		2	0		2
2006	G-1159B	N909JE	PBI	PBI		2043	LV	3/3	1	1		1
2006	"	"	"	"		2044	LV		1	0		1
2006	"	"	"	"		2045	LV		5			5
2006	"	"	SEF	PBI		2046	LV		5			5
Page Total								9/8	36	9		4
Amount Forward								6893	10429	1	33	173
Total to Date								6902	10476	8	33	173
								6496			2176	88300

I certify that the statements made by me on this form are true.


 Pilot's Signature

Instruction												
Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	and Class		
			From	To					ASPERONE	GLIDER	HELICOPTER	
2008 DEC 9	B-727-314	N908JE	PBI	LCQ		486	STATUS: TOP TURN, APPROACH, MISSED APPROACH, V-CUT, MISSED APPROACH, WINDSTOP, RTO, NO FLAP LANDING, SE FL, SE GO AROUND, FLT HAD FAILURE		10			
2009 JAN 5	G-1159B	SPULATOR	DFW	DFW			PC WARMUP		30			
2009 FEB 6	"	"	"	"			HAL LEGS INSTRUCTOR		30			
2009 FEB 4	B-727-200	"	MEA	MEA			FE PC-RAY BIRZANO		15			
2009 FEB 4	"	"	"	"			HAL LEGS		15			
2009 FEB 4	"	"	"	"			CAPTAIN WARMUP		15			
2009 FEB 4	"	"	"	"			HAL LEGS INSTRUCTOR		15			
2009 FEB 4	"	"	"	"			CAPTAIN PC-RAY BIRZANO		15			
2009 MAR 28	B-727-314	N908JE	LCQ	PBI		487		1/1	10			
2009 MAR 7	G-1159B	N909JE	PBI	MANN		2048			7			
2009 MAR 7	"	"	MANN	PBI		2049			8			
2009 JUL 7	B-727-314	N908JE	PBI	PBI		488			9			
2009 JUL 10	G-1159B	N909JE	PBI	PBI		2050			9			
2009 JUL 13	"	"	PBI	PBI		2051			7			
2009 SEP 25	B-727-200	SPULATOR	MEA	MEA					15			
2009 SEP 25	"	"	"	"					15			
2009 OCT 19	B-727-314	N908JE	PBI	VQQ		489		1/1	9			
2009 NOV 30	G-1159B	N909JE	PBI	PBI		2052			12			
2009 JAN 6	"	"	PBI	TEB		2053			25			
2009 JAN 6	"	"	TEB	PBI		2054			25			
I certify that the statements made by me on this form are true.												
										281		281
										6907	10476	8
										6904	10504	9
										6493	10504	9
										2176	8300	2176
										8328	8328	8328

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Page Total

Amount Forward

Total to Date

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Pilot's Signature

signature

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles From	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	...and Class
			From	To						
2010 JAN 12	G-1159B	N909JE	PBI	TEB		2055			ARTAN-GLIDE Helicopter	SEL
13	"	"	TEB	PBI		2058			2 9	
15	"	"	PBI	TEB		2057			2 4	
15 FEB 1	"	"	TEB	PBI		2058		1/1	2 4	
2	"	"	PBI	TEB		2059			2 8	
2	"	"	TEB	BCD		2060			2 4	
2	"	"	BCD	TEB		2061			9	
5	"	"	TEB	BCD		2062			9	
5	"	"	BCD	TEB		2063			2 8	
10	G-1159A	SEMUATOR	DFW	PBI		2064			2 3	
11	"	"	DFW	DFW			HOLDING PATTERNS		2 9	
16	G-1159B	N909JE	PBI	TEB		2065			CONFIDENTIAL DR_000095	
16	"	"	TEB	PBI		2066			3 4	
18	"	"	PBI	TEB		2067		1/1	2 4	
19	"	"	TEB	PBI		2068			2 9	
23	"	"	PBI	TEB		2069		1/1	2 6	
24	"	"	TEB	PBI		2070			2 6	
27	B-72-731A	N908JE	VQQ	PBI		490		1/1	2 5	
I certify that the statements made by me on this form are true.										
<div style="display: flex; justify-content: space-between;"> <div> <p>Page Total</p> <p>Amount Forward</p> <p>Total to Date</p> </div> <div> <p>4/4</p> <p>6904</p> <p>6906</p> </div> <div> <p>463</p> <p>10549</p> <p>105512</p> </div> </div>										
<p>Pilot's Signature <i>David Lodge</i></p>										
										2176 8
										2176 8

suojnujnuj

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Manoeuvres, Endorsements	Number of Landings	Aircraft Category...	SEL	MEL
2010 MAR 2	G-1159B	N909JE	PBI TEB	2571		LV	1/1	ADOLPH GLECK HELICOPTER		24
3	"	"	TEB BCT	2572		LV				30
5	"	"	BCT TIST	2573		LV	1/1			23
5	"	"	TIST PBI	2574		LV				24
15	B-727-200	SPHULATBL	MIA			LV				15
15	"	"	"			LV				15
22	G-1159	NS30GA	PBI PTK			LV				24
25	G-1159B	N909JE	PBI TEB	2575		LV	1/1			25
26	"	"	TEB PBI	2576		LV				26
29	"	"	PBI TIST	2577		LV	1/1			23
29	"	"	TIST PBI	2578		LV				24
7	"	"	PBI TEB	2579		LV	1/1			24
8	"	"	TEB PBI	2580		LV				27
19	"	"	PBI BED	2581		LV	1/1			26
19	"	"	BED TEB	2582		LV				26
20	"	"	TEB PBI	2583		LV	1/1			25
29	"	"	PBI TEB	2584		LV				15
30	"	"	TEB PBI	2585		LV				441
MAR 2	B-727-200	SIMULATBL	MIA			LV				2176
BILL HAMMOND CHECKRIDE										2176
Page Total										441
Amount Forward										165512
Total to Date										165512

I certify that the statements made by me on this form are true.

Pilot's Signature: *David Rodgers*

Pilot's Signature

CONFIDENTIAL DR 000096

Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		...and Class
			From	To					AIRPLANE	GLIDER	HELICOPTER
2010 MAY 6	B-727-314	N908JE	PBI	PBI	441	2086	LV BH	1/1	15		SEL ME
13	G-1159B	N909JE	PBI	TIST	2087	2087	BH	1/1	24		
13	"	"	TIST	PBI	2088	2088	BH	1/1	25		
20	"	"	PBI	TEB	2089	2089	LV	1/1	25		
21	"	"	TEB	PBI	2090	2090	LV	1/1	24		
31	"	"	PBI	TIST	2091	2091	LV	1/1	24		
31 JUN	"	"	TIST	PBI	2092	2092	LV	1/1	27		
2	"	"	PBI	TEB	2093	2093	LV	1/1	24		
3	"	"	TEB	PBI	2094	2094	LV	1/1	24		
9	"	"	PBI	TIST	2095	2095	LV	1/1	27		
9	"	"	TIST	PBI	2096	2096	LV	1/1	CONFIDENTIAL DR 000097		
10	"	"	PBI	TEB	2097	2097	LV	1/1	25		
11	"	"	TEB	PBI	2098	2098	LV	1/1	25		
17	"	"	PBI	TEB	2099	2099	LV	1/1	24		
18	"	"	TEB	PBI	2100	2100	LV	1/1	25		
29 JUL	B-727-200	SIMULATED	MIA	MIA			EX LARRY MORRISON 5 MONTH CHECK		15		
1	G-1159B	N909JE	PBI	TIST	2101	2101	LV	1/1	26		
2	"	"	TIST	PBI	2102	2102	LV	1/1	26		
15	"	"	PBI	TIST	2103	2103	LV	1/1	25		
I certify that the statements made by me on this form are true.								Page Total			
								Amount Forward			
								Total to Date			
								2176 88			
								2176 88			

Pilot's Signature

David Lodge

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Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	SEL MCL	and Class	HS-12 COPY
2010 JUL 16	A26-11548	N909JE	TIST BCT	2107	2107	LV		26	26	SEL MCL	LA 102405
20	"	"	BCT TEB	2108	2108	LV		24	24		
25 AUG 2	"	"	TEB LFPB	2109	2109	LV		72	72		
2	"	"	LFPB CYQX	2110	2110	LV	1/1	57	57		
25	"	"	CYQX TEB	2110	2110	LV	1/1	28	28		
25	"	"	TEB PHX	2116	2116	LV	1/1	47	47		
30 SEP 2	"	"	PHX ABQ	2117	2117	LV	1/1	9	9		
12	"	"	ABQ TEB	2118	2118	LV		38	38		
12	"	"	TEB TIST	2119	2119	LV	1/1	37	37		
12	"	"	TIST BED	2120	2120	LV		46	46	CONFIDENTIAL DR_000098	
12	"	"	BED TEB	2121	2121	LV		16	16		
19	"	"	TEB TIST	2122	2122	LV	1/1	37	37		
21	"	"	TIST TEB	2123	2123	LV		0	0		
26	"	"	TEB EGGP	2124	2124	LV	1/1	65	65		
27	"	"	EGGP EGGW	2125	2125	LV	1/1	7	7		
29 OCT 16	"	"	EGGW LFPB	2126	2126	LV		11	11		
19	"	"	LFPB EGGW	2127	2127	LV	1/1	28	28		
19	"	"	EGGW BGR	2128	2128	LV		68	68		
19	"	"	BGR TEB	2129	2129	LV		14	14		
I certify that the statements made by me on this form are true.							8/6	618	618		
Page Total							6913	6446	33173	8	517
Amount Forward							6913	6446	33173	8	517
Total to Date							6913	6446	33173	8	517

Pilot's Signature

David Lodge

Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		And Class	HLS-100
			From	To					AIRBORNE	GLIDER		
2010											SEL MEL	LA/MOPN
24	G-1159B	N909JE	TEB	TIST		2130	LV	1/1	35		35	
27	B-727-31H	N908JE	PBI	PBI		442	EX	3/3	17		17	
29	G-1159B	N909JE	TIST	EWIR		2131	LV		36		36	
29	"	"	EWIR	CPS		2132	LV		22		22	
30	"	"	CPS	TEB		2133	LV	1/1	20		20	
30	"	"	TEB	ABQ		2134	LV		40		40	
13	"	"	ABQ	TEB		2135	LV	1/1	37		37	
19	"	"	TEB	TIST		2136	LV		38		38	
30	"	"	TIST	TEB		2137	LV	1/1	40		40	
2011	"	"	TEB	TIST		2138	LV		37		37	
JAN 6	"	"	TIST	PBI		2139	LV	1/1	29	CONFIDENTIAL	DR_0000992	9
17	"	"	PBI	TEB		2140	LV		24		24	
18	"	"	DFW	DFW					20		20	
Feb 2	G-1159A	SIMULATOR	DFW	DFW					20		20	
2	"	"	"	"					20		20	
3	"	"	"	"					20		20	
3	"	"	"	"					20		20	
6	G-1159B	N909JE	TEB	TIST		2141			35		35	
10	G-1159B	N530GA	PBI	TEB					24		24	
13	G-1159B	N909JE	TEB	BED		2143	LV	1/1	9		9	
I certify that the statements made by me on this form are true.												
								Page Total	523			
								Amount Forward	6931			
								Total to Date	6944			
									6931	33	173	8
									6944	33	173	8
									6931	33	173	8

David Rodriguez

Pilot's Signature

Instructions

10/15/2019

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Remarks, Procedures, Manoeuvres, Endorsements	Number of Landings	Aircraft Category...		and Class	
			From	To				APARATING	GLIDER	SEL	MEL
2011 Feb 13	G-1159B	N909JE	BED	PBT	2144		LV	27			27
16	"	"	PBT	TIST	2145		LV	24			24
18	S-76C4+	N722JE	TIST	LSJ			LV	3			3
19	"	"	LSJ	TISK			LV	3			3
19	"	"	TISK	LSJ			LV	3			3
19	"	"	LSJ	TIST			LV	1			1
20	"	"	TIST	LSJ			LV	1			1
20	"	"	LSJ	TIST			LV	1			1
20	G-1159B	N909JE	TIST	TIB	2146		LV	42			42
26	"	"	TIB	ABQ	2147		LV	50			50
MAR 1	"	"	ABQ	LGB	2148		LV	16			16
4	"	"	LGB	ABQ	2149		LV	16			16
10	"	"	ABQ	CPS	2150		LV	22			22
26	"	"	CPS	TIB	2151		LV	18			18
26	"	"	TIB	TIST	2152		LV	34			34
27	"	"	TIST	MDPC	2153		LV	8			8
27	"	"	MDPC	TIST	2154		LV	8			8
27	"	"	TIST	MDPC	2155		LV	9			9
28	"	"	MDPC	TIST	2156		LV	9			9
I certify that the statements made by me on this form are true.							Total				
							Pago Total	286	12		
							Amount Forward	16549	33	1738	
							Total to Date	167835	33	1750	

I certify that the statements made by me on this form are true.

Pilot's Signature: *David Rodriguez*

I certify that the statements made by me on this form are true.

Pilot's Signature

Instructions

Date

Front

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		...and Class		Condition
			From	To					AERIAL	CLAS	SEL	MEL	
2011	G-11590	N909JE	PBI	TEB		2168	LV	1/1	24		24		XC
9	"	"	TEB	ASE		2169	LV		39		39		2
9	"	"	ASE	ABQ		2170	LV		12		12		3
14	"	"	ABQ	BFI		2171	LV	1/1	20		20		1
15	"	"	BFI	APC		2172	LV		16		16		2
17	"	"	APC	TEB		2173	LV	1/1	51		51		1
19	"	"	TEB	TIST		2174	LV		35		35		5
20	"	"	TIST	TEB		2175	LV	1/1	40		40		3
25	B-727-200	SIMULAZON	MIA	MIA					20		20		4
25	"	"	"	"					20		20		
26	"	"	"	"					10		10		
26	"	"	"	"					10		10		
28	G-1159B	N909JE	TEB	PBI		2176			0		0		
28	"	"	PBI	PBI		2177		3/3	11		11		
31	B-727-31H	N908JE	BQK	PBI		494	LV	1/1	11		11		1
31	BHT-407	N491GM	TIST	LSJ			LV		3		3		
31	"	"	LSJ	LSJ			LV		7		7		
34	G-1159B	N909JE	SWF	TIST		2180	LV	1/1	39		39		
13	"	"	TEB	TIST		2182	LV	1/1	38		38		
Page Total									464			10	
Amount Forward									108324			331794	
Total to Date									108728			331804	

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I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodriguez

Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category		SEL	MEL	1964-1965 1966-1967 1968-1969
			From	To					GLIDER	HELICOPTER			
2011 Nov 21	B-727-200	8840100K	MIA	MIA			FEARLESS RIDE PIRATES 125 LV		10			10	
2012 Dec 25	"	"	"	"			CATAPULT KEY BIRDS AND HOUNDS RVSM TEST FLIGHTS		20			20	
2012 Jan 3	B-727-311H	N908JE	PBI	PBI	495		LV		16			16	
2012 Jan 13	"	"	PBI	PBI	496		LV		11			11	
2012 Jan 13	"	"	PBI	VQQ	497		LV		9			9	
2012 Jan 18	G-1159B	N909JE	TEB	MHT	2193		LV		9			9	
2012 Jan 18	"	"	MHT	LFPB	2194		LV		61			61	
2012 Jan 16	"	"	LFPB	GMMX	2195		LV		30			30	
2012 Jan 17	"	"	GMMX	DIAP	2196		LV		42			42	
2012 Jan 18	"	"	DIAP	GVAC	2197		LV		36			36	
2012 Jan 18	"	"	GVAC	TIST	2198		LV		71			71	
2012 Jan 23	BHT-467	N491GM	LST	TIST			LV						1
2012 Feb 12	G-1159B	N909JE	TIST	PBI	2199		LV		29			29	
2012 Feb 13	G-1159A	SIMULAMC	DFW	DFW			LV		30			30	
2012 Mar 6	"	"	"	"			LV		20			20	
2012 Mar 6	B-727-311H	N908SE	VQQ	VQQ	448		LV		5			5	
2012 Mar 6	"	"	VQQ	PBI	498		LV		9			9	
2012 Mar 16	"	"	PBI	JFK	499		LV		24			24	
2012 Mar 17	"	"	JFK	LFPB	500		LV		75			75	
CONFIDENTIAL DR 000103													
Page Total													507
Amount Forward													109728
Total to Date													217688680
													545
													2176887467
													546

I certify that the statements made by me on this form are true.

Plot's Signature

David Lodge

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Manoeuvres, Endorsements	Number of Landings	Aircraft Category...		...and Class	Helix
			From	To					ATROLONE	GLDEF	SEL	LAND
2012 MAR 19	B-727-311H	N908JE	LFPB	EGHL		501	LASHAM	1/1	10		MEL	10
APR 18	G-1159B	N909JE	TGB	TIST		1207	LV		37			37
30 MAR	B-727-200	SIMULATOR	MIA	MIA			WARMUP AS CAPTAIN AND LV CAPTAIN ENGINE HOLDING CAPTAIN PC HOLDING HARRY BROWN - EXAMINED JOG BRUNT		40			40
1	"	"	"	"			LV		40			40
3	G-1159B	N909JE	TIST	PBI		2208	LV		27			27
4	"	"	PBI	TGB		2209	LV	1/1	25			25
JUL 8	"	"	TGB	TIST		2212	LV		35			35
20	"	"	TIST	TIST		2213	LV	3/3	2			2
21	"	"	TIST	TGB		2214	LV	1/1	30			30
26	"	"	TGB	PBI		2215	LV		24			24
30	"	"	PBI	CNW		2216	LV	1/1	24			24
30	"	"	CNW	ABQ		2217	LV	1/1	24			24
AUG 15	"	"	ABQ	SFO		2218	LV	1/1	15			15
6	"	"	SFO	ABQ		2219	LV		23			23
18	"	"	ABQ	TGB		2220	LV		21			21
22	"	"	TGB	IAD		2221	LV	1/1	36			36
22	"	"	IAD	PBI		2222	LV	1/1	9			9
26	"	"	PBI	TIST		2223	LV		23			23
26	"	"	TIST	TGB		2224	LV	1/1	26			26
56	"	"	TGB				LV	1/1	38			38
Page Total									49	3		493
Amount Forward									10123	5		101235
Total to Date									10972	8		109728
2176									88746	7		8874675
2176									88746	0		8874605

I certify that the statements made by me on this form are true.

David Reddy

Photo Signature

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suojutisu

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		...and Class	
			From	To					AIRPLANE GLIDER	HELICOPTER	SEL	MEL
2012	G-1159B	N909JE	TEB	ABQ	7225	7225	LV		4	1		4
18	"	"	ABQ	ONT	7226	7226	LV	1/1	1	6		1
19	"	"	ONT	TEB	7227	7227	LV		4	8		4
28	"	"	TEB	PBI	7228	7228	LV	1/1	2	5		2
Oct 1	"	"	PBI	TIST	7229	7229	LV		2	6		2
6	"	"	TIST	TEB	7230	7230	LV	1/1	3	7		3
24	B-727-31H	N908JE	EGHL	EGSS	502	502	LV		1			
28	G-1159B	N909JE	TEB	TIST	7231	7231	LV	1/1	3	9		3
Nov 12	B-727-200	SEMOLATOL	MIB	MIA			LV		2	0		2
12	"	"	"	"			LV		2	0		2
20	G-1159B	N909JE	TEB	PBI	7235	7235	LV		2	0		2
25	"	"	PBI	MDW	7236	7236	LV		2	8		2
26	"	"	MDW	TEB	7237	7237	LV		1	6		1
Dec 6	B-727-31H	N908JE	EGSS	EGSS	503	503	LV	1/1	7			1
7	"	"	EGSS	JFK	504	504	LV		8	2		1
14	"	"	JFK	TIST	505	505	LV	1/1	3	7		1
2013	"	"	TIST	PBI	506	506	LV		2	8		1
Jan 10	G-1159B	N909JE	TEB	PBI	7239	7239	LV		2	9		2
17	"	"	PBI	TEB	7240	7240	LV		2	7		2
21	"	"	TEB	TEB			LV		2	7		2
I certify that the statements made by me on this form are true.								Page Total				
								6/4				
								Amount Forward				
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								Total to Date				
								11028.6				
								33180.6				
								33180.6				

Pilot's Signature

David Rodriguez

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	...and Class
2013			From To						
Feb 7	B-727-311	N908JE	PBI BQK		507	LV	1/1	AIRPLANE	SEL 1
13	G-1159A	STIMULANT	DFW DFW			300	3/3	2 0	
14	"	"	" "			RECKY GRAVES - CONTRAINDICATION		2 0	
16	G-1159B	N909JE	TEB PBI		2245	RECKY GRAVES - CONTRAINDICATION	1/1	3 0	
18	"	"	PBI TEB		2244	RECKY GRAVES - CONTRAINDICATION	1/1	2 0	
22	"	"	TEB ABQ		2247	RECKY GRAVES - CONTRAINDICATION	1/1	4 9	
24	"	"	ABQ LGB		2248	RECKY GRAVES - CONTRAINDICATION	1/1	1 7	
26	"	"	LGB TEB		2249	RECKY GRAVES - CONTRAINDICATION	1/1	4 8	
MAR 1	"	"	TEB PBI		2250	BILL GATES	1/1	2 5	
19	"	"	TIST TEB		2252		1/1	4 2	
APR 5	"	"	TEB TIST		2256		1/1	3 6	
21	"	"	TIST TEB		2257		1/1	CONFIDENTIAL DR 000106	
25	"	"	TEB ASE		2258		1/1	4 3	
25	"	"	ASE ABQ		2259		1/1	1 0	
25	"	"	ABQ TUL		2260		1/1	1 3	
29	"	"	TUL VNY		2261		1/1	3 0	
30	"	"	VNY TEB		2262		1/1	4 9	
MAY 6	"	"	TEB TIST		2263		1/1	3 8	
12	"	"	TIST PBI		2264		1/1	2 7	
I certify that the statements made by me on this form are true.									
Pilot's Signature									
David Rodriguez									
Page Total							14/12	574	
Amount Forward							6904	11028 6	33 180 6
Total to Date							6904	110860	33 180 6

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		SEL	...and Class
			From	To					PERFORMANCE	WING-LOADER		
2013 MAY 15	G-1159B	N909JE	PBI	TIST		2245	LV		23		MEL	
22	"	"	TIST	ISP		2246	DARREN ROYHILL	1/1	36		36	
24	"	"	ISP	TEB		2247	LV	1/1	8			
24	"	"	TEB	TIST		2248	LV	1/1	37		37	
JUN 3	"	"	TIST	ISP		2249	LV	1/1	39		39	
6	"	"	ISP	LFPB		2250	LV	1/1	70		70	
15	"	"	LFPB	LPAZ		2271	LV		39		39	
16	"	"	LPAZ	TIST		2272	LV		56		56	
24	"	"	TIST	TEB		2273	LV	1/1	39		39	
JUL 17	"	"	TIST	TEB		2276	BRUNO DIMAGRO	1/1	38		38	
19	"	"	TEB	BEB		2277	LV		9			
19	"	"	BEB	TIST		2278	LV		3	CONFIDENTIAL DR	000107	3
25	"	"	TIST	PBI		2279	LV	1/1	26			2
26	"	"	PBI	TEB		2280	LV		25			2
AUG 1	"	"	TEB	ABQ		2281	BRUNO DIMAGRO	1/1	42			4
3	"	"	ABQ	LAS		2282	BD	1/1	13			1
4	"	"	LAS	ABQ		2283	BD	1/1	14			1
7	"	"	ABQ	ASE		2284	BD	1/1	11			1
7	"	"	ASE	BFI		2285	BD	1/1	22			2
I certify that the statements made by me on this form are true.									Page Total			58
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									Total to Date	6592		2176 8896
									Amount Forward	6581	33	1806
									Total to Date	11144	4	33 1806

Pilot's Signature

Daniel Rodriguez

EXHIBIT CC

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Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 3, 2016
9:07 a.m.

C O N F I D E N T I A L

Deposition of DAVID RODGERS, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

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Page 2

2

3 A P P E A R A N C E S:

4 BOIES SCHILLER & FLEXNER, LLP
Attorneys for Plaintiff

5 401 East Las Olas Boulevard
Fort Lauderdale, Florida 33301

6 BY: BRADLEY EDWARDS, ESQ.

7

8 HADDON MORGAN & FOREMAN, P.C.
Attorneys for Defendant

9 150 East 10th Avenue
Denver, Colorado 80203

10 BY: JEFFREY PAGLIUCA, ESQ.

11

12

13 ALSO PRESENT: Sandy Perkins, Paralegal
Boies Schiller & Flexner

14

Ryan Kick, Videographer

15

16

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3

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	Equus Global Aviation offering	

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1 DAVID RODGERS

2 A. Yes.

3 Q. Can you -- can you tell me -- I have been
4 provided by your attorney a -- what has been
5 represented to be a copy, a direct copy of that
6 logbook. And I'm going to mark this as
7 Plaintiff's 1. I just want you to confirm that this
8 is an accurate copy of the original logbook that you
9 brought to your deposition today.

10 A. Yes.

11 MR. REINHART: Let him show it to you.

12 BY MR. EDWARDS:

13 Q. There you go.

14 (The referred-to document was marked by
15 the court reporter for Identification as
16 Deposition Exhibit 1.)

17 MR. REINHART: It is not a copy of the
18 entire book. It is the time period that was
19 covered by the subpoena. I just want to make
20 clear the book covers the time period outside
21 the subpoena.

22 MR. EDWARDS: Okay. I will let him
23 clarify that, of course, too.

24 THE WITNESS: Yes. It is logbook. It is
25 not 40 years, but it is my logbook.

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1 DAVID RODGERS

2 BY MR. EDWARDS:

3 Q. Okay. You can keep this -- that down
4 there --

5 A. Okay.

6 Q. -- so we can keep track of the exhibits.

7 A. Okay.

8 Q. So does the copy that you just went
9 through, is that an exact copy of the original
10 logbook from the November 1995 date through, it
11 looks like, September 2013? That period of time?

12 A. Yes.

13 Q. Okay. And what is this book? What do you
14 call the book?

15 A. It is called the standard pilot master
16 log.

17 Q. All right. And who made the various
18 entries in the book?

19 A. I did.

20 Q. When did you make --

21 MR. PAGLIUCA: Brad, can you hang on for
22 one second.

23 MR. EDWARDS: Sure.

24 MR. PAGLIUCA: You said September 2013, I
25 thought.

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1 DAVID RODGERS

2 MR. EDWARDS: That is what I have on the
3 last page.

4 MR. PAGLIUCA: My last page is 2008 on
5 this copy, 093 Bates label.

6 MR. REINHART: There's 108 pages to the
7 exhibit.

8 MR. PAGLIUCA: I'm missing the last 8
9 pages. That is why.

10 MS. PERKINS: Do you want the last copy?
11 What is your last page?

12 MR. PAGLIUCA: Ninety-three is my last
13 page.

14 That is why I only go through '08.

15 MS. PERKINS: So I will give you my '94 to
16 the end. That should give you a complete. Oh,
17 you're looking -- which one are you looking at,
18 the new one or the old one?

19 MR. EDWARDS: The one through '08.

20 MR. PAGLIUCA: Okay.

21 MR. EDWARDS: Okay. Are you ready, Jeff?

22 MR. PAGLIUCA: Yes.

23 BY MR. EDWARDS:

24 Q. When did you make each individual entry?

25 A. It could have been on that date that it

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1 DAVID RODGERS

2 says. It could have been possibly a later date.

3 Most likely, fairly close to that date.

4 Q. Okay. How did you make sure that the log
5 entries that you were creating were accurate?

6 A. Well, people get on the airplane and I see
7 who the people are, and I put them down there.

8 Q. Okay. So you are making the notation at
9 or around the time that you are making this
10 observation -- the observations?

11 A. Correct.

12 Q. And you are recording the data accurately
13 in your logbook?

14 A. As accurately as I can.

15 Q. Okay.

16 A. Yes.

17 Q. Can we just look at the first page of the
18 exhibit?

19 A. Uh-huh.

20 Q. And if you could walk me through, let's
21 just take the first line.

22 A. Uh-huh.

23 Q. In the top left corner, there is a date.

24 A. Correct.

25 Q. And it says, "NOV '95." Is that you

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1 DAVID RODGERS

2 indicating that this is November 1995?

3 A. Yes.

4 Q. Okay. And the first line under that in
5 the date column says 17. Is that November 17th,
6 1995?

7 A. Yes.

8 Q. Is that a notation that you would have
9 made on November 17th, 1995?

10 A. Yes.

11 Q. And the next column over under "aircraft
12 make and model," there is a number there. What is
13 that number?

14 A. That's the model of aircraft we're flying.
15 It's a G-1159B. It is Gulfstream, II-B aircraft.

16 Q. Okay. And then the next column over,
17 aircraft identification mark?

18 A. It is the registration number of the
19 aircraft.

20 Q. And what is the registration number? What
21 does that mean?

22 A. The number that is on the side of every
23 aircraft to identify what country it is from and
24 what particular airplane it is in that country. The
25 N means United States.

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1 DAVID RODGERS

2 Q. And is that number unique to the aircraft?

3 A. Yes.

4 Q. So there is no other aircraft at the same
5 time bearing the identification number in N908JE?

6 A. That's correct.

7 Q. Who picks the identification number? I
8 understand N means United States.

9 A. Right.

10 Q. Who picks the 908JE?

11 A. It depends -- some aircraft, I mean, when
12 you get them, they already have the number on there,
13 and so that would be one way. Sometimes the
14 manufacturer puts them on there.

15 You can also request a certain number, if
16 you so chose to do so.

17 Q. Okay. The particular air -- these
18 particular logs were produced in a -- as a
19 consequence of a subpoena issued in the case of
20 Virginia Roberts Giuffre versus Ghislaine Maxwell.

21 A. Uh-huh.

22 Q. Is that your understanding?

23 A. Yes.

24 Q. And the period of time that we were
25 produced -- I understand you have flown for 40

Confidential

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1 DAVID RODGERS

2 years. The period of time -- or that is evidenced
3 by this logbook is '95 through 2013.

4 Why was it that period of time that was
5 chosen?

6 A. Because that is what the subpoena
7 requested.

8 Q. Okay. Is that when you started flying for
9 Jeffrey Epstein?

10 A. No.

11 Q. When did you start flying for Jeffrey
12 Epstein?

13 A. July of 1991.

14 Q. Okay. Do you have available today the
15 entries going back as far as July 1991?

16 A. I don't know. I have to look and see.

17 Q. Okay.

18 A. No. Because this is from 7/28 of '94.

19 Q. Okay. So that particular logbook begins
20 July 28th, 1994?

21 A. Yes.

22 Q. And were you privately flying for Jeffrey
23 Epstein on November 17th, 1995?

24 A. Yes.

25 Q. And is that Gulfstream that you described

Confidential

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1 DAVID RODGERS

2 a Jeffrey Epstein owned or controlled airplane?

3 A. It was -- let me think.

4 This was 908 Juliet, Echo -- I believe it
5 was owned by Hyperion Air, Inc., I believe.

6 Q. And is Hyperion Air, to your
7 understanding, a company associated with Jeffrey
8 Epstein?

9 A. As far as I know. I mean, I would assume
10 so, but --

11 Q. Was Jeffrey Epstein your primary
12 passenger --

13 A. Yes.

14 Q. -- on that airplane?

15 A. Yes.

16 Q. And who was the individual that gave you
17 direction as to what passengers to let on and off
18 the airplane and where to fly, et cetera?

19 A. Well, Jeffrey was usually -- I mean,
20 almost always on the airplane, unless we were going
21 to maintenance. And so when he got there, he would
22 have the people with him.

23 Q. Okay. So going back to the aircraft
24 identification mark, 908JE, does the JE signify the
25 initials of Jeffrey Epstein?

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1 DAVID RODGERS

2 A. I would assume so.

3 Q. Okay.

4 A. But technically they are actually the
5 phonetic letters that we use. But technically it is
6 Juliet echo; it is not Jeffrey Epstein. As far as
7 radio phraseology, we don't answer Jeffrey Epstein;
8 we answer Juliet.

9 Q. Okay. But the JE doesn't signify some
10 jurisdictional code?

11 A. No.

12 Q. It is -- it is chosen by the owner of the
13 aircraft?

14 A. Right. Right.

15 Q. So as his pilot and as Jeffrey Epstein
16 being the main passenger, you have presumed that JE
17 signifies his initials?

18 A. I would assume so.

19 Q. In fact, we will get to it later down the
20 road, but the -- the other plane also bears the
21 ending initials JE; is that right?

22 A. Yes.

23 And this N number that's on this airplane
24 was eventually switched to another airplane.

25 Q. To the Boeing?

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1 DAVID RODGERS

2 A. To the Boeing, correct.

3 Q. Okay.

4 So if we go back to this first entry, the
5 next column says, "From CMH."

6 A. Yes.

7 Q. And what is that?

8 A. Columbus, Ohio.

9 Q. That is an airport code?

10 A. Airport identifier.

11 Q. And, again, that airport code is unique to
12 a particular airport?

13 A. Correct.

14 Q. The next is "To PBI"?

15 A. Yes.

16 Q. Where is that?

17 A. West Palm Beach.

18 Q. And flight number? The next column says
19 "Miles Flown."

20 A. Right.

21 Q. That is not something that you log.

22 A. I don't.

23 Q. You kept pretty meticulous logs.

24 So the next column is flight log -- or
25 flight number?

Confidential

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1 DAVID RODGERS

2 Q. Okay.

3 A. But I'm not even sure we still had it at
4 this point in time.

5 Q. Yeah. It shows up on the next page. We
6 will get there.

7 A. Does it? Okay.

8 So then, yes, the answer is, yeah, we
9 still had the airplane. But we wouldn't have used
10 that.

11 Q. So is there any way of telling how Jeffrey
12 Epstein, Ghislaine Maxwell, Adam Perry Lang, and
13 Virginia were in the Virgin Islands on that, from
14 December 14th, 2000 --

15 MR. PAGLIUCA: Object to foundation.

16 BY MR. EDWARDS:

17 Q. -- based on your knowledge or your logs or
18 anything else?

19 A. No, I wouldn't have any way of knowing.

20 Q. Okay.

21 A. Because the next flight that they are on
22 was like this Palm Beach one, January 16th. So I
23 wouldn't have any idea.

24 Q. Okay. To your knowledge, did Jeffrey
25 Epstein ever fly commercially?

Confidential

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1 DAVID RODGERS

2 A. He probably has. Back then at this time,
3 I'm going to say probably not. But I know that he
4 has flown commercially. But usually that would be
5 like going to Europe, maybe.

6 Q. Okay. January 16th through the 25th,
7 those flights, do you see that block that I'm
8 talking about?

9 A. Yes.

10 Q. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, and then at times Shelly Lewis, do you see
12 that?

13 A. Yes, right.

14 Q. The 25th it lands in Teterboro. And the
15 next day, on the 26th, leaves out of Teterboro with
16 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and
17 Virginia Roberts. This time you wrote the whole
18 name.

19 A. Right. Right.

20 Q. So when you write the full name, does that
21 signify -- that's when you may have learned her last
22 name?

23 A. Correct.

24 Q. And do you know how she -- how she got up
25 to New Jersey or New York?

Confidential

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1 DAVID RODGERS

2 Boeing?

3 A. Yes.

4 Q. The Boeing, was that previously owned by
5 The Limited or Les Wexner?

6 A. I'm not sure of the company name,
7 officially. But probably, yes.

8 Q. Some association with him?

9 A. Some association, yes.

10 Q. Do you know who flew the Gulfstream while
11 you were doing the simulator?

12 A. Well, it would have been Larry Visoski,
13 I'm not sure who the first officer was.

14 Q. Do you know if any logs were kept of the
15 passengers' names?

16 A. While I was at school?

17 Q. Right, while you were at school.

18 A. There probably were logs, but I don't know
19 where they are.

20 Q. Have you ever spoken with Larry about
21 whether he kept names of passengers?

22 A. I don't think he does.

23 Q. Do you know where Larry Visoski flew the
24 Gulfstream for the month that you were --

25 A. No.

Confidential

Page 107

1 DAVID RODGERS

2 different, because one day is the 5th; one day is
3 the 6th. But we landed there like at 11:50 at
4 night. And then when we took off, it was, you know,
5 the next day.

6 Q. Okay. Got it.

7 And then where do you go the next day?

8 A. We went from Stephenville to
9 Paris-Le Bourget.

10 Q. And who were the passengers going to
11 Paris?

12 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
13 Tayler, and Virginia Roberts.

14 Q. And then what's the next flight?

15 A. On the 8th, from Paris to -- I believe
16 that is in Spain.

17 Q. Granada, Spain?

18 A. Granada, Spain. Correct.

19 Q. Okay. And who are the passengers on that
20 trip?

21 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
22 Tayler, Virginia Roberts, Alberto and Linda Pinto,
23 one female, and Ricardo, it looks like Orieta.

24 Q. And then what's the next flight?

25 A. From there to Tangiers. From Granada to

Confidential

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1 DAVID RODGERS

2 CERTIFICATE OF OATH

3 STATE OF FLORIDA)

4 COUNTY OF MIAMI-DADE)

5
6 I, the undersigned authority, certify
7 that DAVID RODGERS personally appeared before
8 me and was duly sworn.

9 WITNESS my hand and official seal
10 this 8th day of June, 2016.

11 Kelli Ann Willis, RPR, CRR
12 Notary Public, State of Florida
13 Commission FF928291, Expires 2-16-20
14 + + + + + + + + + + + + + + + +

15 CERTIFICATE

16 STATE OF FLORIDA)

17 COUNTY OF MIAMI-DADE)

18 I, Kelli Ann Willis, Registered
19 Professional Reporter and Certified Realtime
20 Reporter do hereby certify that I was
21 authorized to and did stenographically report the
22 foregoing deposition of DAVID RODGERS; that a
23 review of the transcript was not requested; and
24 that the transcript is a true record of my
25 stenographic notes.

I FURTHER CERTIFY that I am not a
relative, employee, attorney, or counsel of any
of the parties, nor am I a relative or employee of
any of the parties' attorney or counsel connected
with the action, nor am I financially interested
in the action.

Dated this 8th day of June, 2016.

23

24 KELLI ANN WILLIS, RPR, CRR

25

EXHIBIT DD

**INTENTIONALLY
LEFT BLANK**

EXHIBIT EE

 Date: 4/25/16 ROYAL PALM BEACH POLICE DEPARTMENT Page: 1
 Time: 8:51:56 Citation Tracking Report Program: CMS307L

Case Number : 1-02-009702
 Issued By : KLOEPPING, KURT 6/19/02 13:55
 Entry Employee : STEPNOWSKI, DOROTHY 6/24/02 13:55
 Zone/Division : Zone Two (2) (So of Okee/E thr Wil)
 District : PATROL
 Street Name : CRESTWOOD BL /SPARROW
 Last Name : ROBERTS, VIRGINIA LEE
 Street Number : [REDACTED] RD
 City : LOXAHATCHEE, FL 33470
 Birth Date : [REDACTED]
 Race : White Oper Lic No. : [REDACTED]
 Sex : Female

***** VEHICLE INFORMATION # 1 *****
 Case Number : 1-02-009702 License Number : G13BTQ FL
 Vehicle Year : 1993 Make : PONTIAC
 Style : TWO DOOR Color - Top : White
 Color - Bottom : White

***** VIOLATION INFORMATION # 1 *****
 Case Number : 1-02-009702 Citation Number: 9702BOE5
 Statute/Ordin : 316.189 1 ????? : NA

***** END OF REPORT *****

CERTIFIED
 TO BE A TRUE COPY
 RIC L. BRADSHAW, SHERIFF

GM_00776

EXHIBIT FF

OBT Number		PROBABLE CAUSE AFFIDAVIT		1. Request for Warrant 2. N.T.A.		3. Request for Capias 4. Request for Capias		Juvenile	
ADMIN	Agency ORI Number FLO 5 0 0 0 0 0	Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE	Agency Report Number 0 6 1031094488						
ADMIN	Charge Type: Check as many as apply.	<input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other							
DEF	Name (Last, First, Middle)	Alias		Race	Sex				
DEF	Charge Description	Charge Description							
DEF	Charge Description	Charge Description							
VICTIM	Victim's Name (Last, First, Middle)	Race	Sex	Date of Birth					
VICTIM	Local Address (Street, Apt. Number)	(City)	(State)	(Zip)	Phone	Address Source			
VICTIM	Business Address (Name, Street)	(City)	(State)	(Zip)	Phone	Occupation			
The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. <input type="checkbox"/> The Person taken into custody ... <input type="checkbox"/> committed the below acts in my presence. <input type="checkbox"/> confessed to admitting to the below facts. <input checked="" type="checkbox"/> was observed by <u>James D. Smith</u> who told <u>Det. D. Smith</u> that he/she saw the arrested person commit the below acts. <input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.									
On the _____ day of _____ 20____ at _____ <input type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)									
<p>On 8-15-02 a report was written by Deputy Comargo #2178 ref to a hand theft case that occurred at Hollywood Video located at 13920 Wellington Tr in Wellington, FL. On 8-11-02, The Store Manager Philip Napuli advised that on 8-11-02 it was found that 18 video games had been stolen out of their box and the boxes left on the shelf. It was found that the suspect had come into the store while it was open to the public and had cut the side of the game box with a sharp object and took the game out of the box leaving the box on the shelf. Mr. Napuli advised that the crime was captured on the surveillance camera and he had a video. On 8-30-02 the detective unit with the assistance of two employees who checked the video for 8-11-02 and it was found that the crime was captured on tape. It showed a person wearing long shorts and a long shirt. He observed this person pick up the game off the shelf place the tape under his shirt, then use force placing the game in his pants.</p>									
ADMINISTRATIVE	STATE OF FLORIDA COUNTY OF PALM BEACH <u>James D. Smith</u> 3483 (Signature of Arresting Investigative Officer) <u>Det. D. Smith</u> 3483 12th Sept 02 by <u>Det. D. Smith Jr</u> (Print Name of Arresting Investigative Officer, who is personally known to me and/or produced identification. Type of identification used) <u>Handwritten</u> 6336 1/5/02 <u>Handwritten</u> 6142 Notary Public, Clerk of Court, Officer (F.S.S. 117.10)								
DISTRIBUTION: WHITE — Court Copy GREEN — State Attorney YELLOW — Agency PINK — Agency									

ADMIN.		OBT Number		PROBABLE CAUSE AFFIDAVIT		1. Arrest 2. N.T.A.		3. Request for Warrant 4. Request for Capias		Juvenile <input type="checkbox"/>	
Agency ORI Number FLO-5 0 0 0 0 0		Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE		Agency Report Number 0 6 - 02 - 10944881							
Charge Type: Check as many as apply. <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony		<input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor		<input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other		Special Notes:					
DEF.		Name (Last-First, Middle) Leagore, Anthony		Alias		Race Wm		Sex M			
CHARGES		Charge Description Grand Theft \$10,000 (2nd)		Charge Description							
		Charge Description		Charge Description							
VICTIM		Victim's Name (Last, First, Middle) Hallen, Victor		Local Address (Street, Apt. Number) 1220 Hallen Tr Wellington FL 33411		(City) (State) (Zip)		Phone 232-0520		Address Source West/comp	
		Business Address (Name, Street) Same		(City) (State) (Zip)		Phone				Occupation	
<p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law:</p> <p><input type="checkbox"/> committed the below acts in my presence.</p> <p><input type="checkbox"/> confessed to _____ admitting to the below facts.</p> <p><input checked="" type="checkbox"/> was observed by Sgt Angelone who told me that he/she saw the arrested person commit the below acts.</p> <p><input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the _____ day of _____ 20__ at _____ <input type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p>											
<p>and place the game back on the shelf. In some captured videos the subject is facing the camera and you can see him getting the game box in plain view. Store Employee, Sgt Angelone also viewed the video surveillance tape and he gave a sworn statement that the suspect is known to him Member #0962516974 this being Anthony Figueira who he has known for years. It was also found that Mr Figueira also did some crime under case #02-107617 on 8-24-02 where he was also identified. The value of the stolen property in this case is \$900.00. Due to the evidence that the suspect took the crime capture on video I am recommending Probable Cause for the arrest of this person for the crime of Grand Theft. This action is contrary to F.S. Filed for arrest not in system yet arrested 10-19-02</p>											
<p align="center">STATE OF FLORIDA - PALM BEACH COUNTY</p> <p align="center">I hereby certify that the foregoing is a true copy of the record in my office with corrections if any as required by law.</p> <p align="center">THIS <u>8</u> DAY OF <u>Aug</u>, 20<u>02</u></p> <p align="center">SHARON R. BOKK CLERK & COMPTROLLER</p> <p align="center">By <u>[Signature]</u> DEPUTY CLERK</p>											
<p>STATE OF FLORIDA COUNTY OF PALM BEACH</p> <p>[Signature] Notary Public, Clerk of Court, Officer (F.S.S. 117.10)</p> <p align="right">GM_01203 PAGE ____ OF ____</p>											

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION "W" (CGS)

STATE OF FLORIDA

vs.

ANTHONY LUIS ZAC FIGUEROA,
[REDACTED]

CASE NO. 02CF012205A02
BOOKING NO. 2002343589

FILED
02 OCT 29 PM 12:14
CLERK OF COURT
Palm Beach County, Florida

ORIGINAL
INFORMATION FOR
GRAND THEFT

In the Name and by Authority of the State of Florida:

BARRY E. KRISCHER, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that ANTHONY LUIS ZAC FIGUEROA on or about August 11, 2002, in the County of Palm Beach and State of Florida, did knowingly obtain or use, or endeavor to obtain or use video games of a value of \$300.00 or more, which was the property of HOLLYWOOD VIDEO, or any other person not the defendant(s), with the intent to permanently or temporarily deprive HOLLYWOOD VIDEO or any other person not the defendant(s) of the property or benefit therefrom or to appropriate the property to the use of ANTHONY LUIS ZAC FIGUEROA or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1) and (2)(c). (3 DEG FEL)

Jill Estey Richstone
JILL ESTEY RICHSTONE
FL. BAR NO. 0928933
Assistant State Attorney

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, JILL ESTEY RICHSTONE Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.

Jill Estey Richstone
Assistant State Attorney

Sworn to and subscribed to before me this 29 day of October, 2002.

STATE OF FLORIDA - PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.

JER/sw



THIS

DAY OF

SHARON R. BOCK

CLERK & COMPTROLLER

FCIC REFERENCE NUMBER

GRAND THEFT 2399 By

DEPUTY CLERK

Ellen Jordan
NOTARY PUBLIC, State of Florida



Ellen Jordan
MY COMMISSION # CC799741 EXPIRES
December 28, 2002
BONDED THRU TROY FAIN INSURANCE, INC.

6
GM_01204

IN THE CRIMINAL DIVISION OF THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT OF FLORIDA,
IN AND FOR PALM BEACH COUNTY

CASE NO. 02 012205CF A02 DIV. W

OBTS NUMBER _____

STATE OF FLORIDA

[] COMMUNITY
CONTROL
VIOLATOR

[] PROBATION
VIOLATOR

01/28/2003 11:36:12 20030047647
OR BK 14720 PG 1936

Palm Beach County, Florida
Dorothy H. Wilken, Clerk
STATE OF FLORIDA - PALM BEACH COUNTY



I hereby certify that the foregoing is a
true copy of the record in my office with
redactions, if any as required by law.

THIS DAY OF Aug 2018
SHARON R. BOOK
CLERK & COMPTROLLER

Stowers
DEPUTY CLERK

Anthony Luis Zac Figueroa
DEFENDANT

W
RACE

M
GENDER

SOCIAL SECURITY NUMBER _____

FILED

JAN 15 2003

JUDGMENT

DOROTHY H. WILKEN, CLERK
CIRCUIT & COUNTY COURTS

The above Defendant, being personally before this Court represented by

S. Lawrence App (attorney)

[] Having been tried and found guilty of
the following crime(s):

☒ Having entered a plea of guilty to
the following crime(s):

[] Having entered a plea of nolo
contendere to the following
crime(s):

COUNT	CRIME	OFFENSE STATUTE NUMBER(S)	DEGREE
<u>1</u>	<u>Grand Theft</u>	<u>812.014(1) and (2)(c)</u>	<u>3rd</u>

☒ and no cause having been shown why the Defendant should not be adjudicated guilty. IT IS ORDERED THAT the Defendant is hereby
ADJUDICATED GUILTY of the above crime(s).

[] and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty regardless of adjudication, to attempts or
offenses relating to sexual battery (ch. 794), lewd and lascivious conduct (ch. 800), or murder (s. 782.04), aggravated battery (s. 784.045),
burglary (s. 810.02), carjacking (s. 812.133), or home invasion robbery (s. 812.135), or any other offense specified in section 943.325, the
defendant shall be required to submit blood specimens.

☒ and good cause being shown IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD.

SENTENCE
STAYED

[] The Court hereby stays and withholds imposition of sentence as to count(s) and places the Defendant on
[] Probation and/or [] Community Control under the supervision of the Dept. of Corrections (conditions of probation
set forth in separate order).

SENTENCE
DEFERRED

[] The Court hereby defers imposition of sentence until _____

The Defendant in Open Court was advised of his right to appeal from the Judgment by filing notice of appeal with the Clerk of Court within thirty days
following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance
of counsel in taking said appeal at the expense of the State upon showing of indigency.

DONE AND ORDERED in Open Court at Palm Beach County, Florida, this 15 day of January, 2003

John J. Hony
CIRCUIT COURT JUDGE

GM_01205

PLEA IN THE CIRCUIT COURT
THE FOLLOWING IS TO REFLECT ALL TERMS OF THE NEGOTIATED SETTLEMENT

Name: Anthony Luis Zac FigueroaPlea: Guilty ☒ Guilty/Best Interest ☐ Nolo Contendere ☐

Case No.	Charge	Count	Lesser	Degree
2012206CFAD2	Grand Theft	1	—	3F
2012205CFAD2	Grand Theft	1	—	3F

FILED

JAN 15 2003

DOROTHY H. WILKEN, CLERK
CIRCUIT & COUNTY COURT 3
(CRIM. DIV.)

State to Nolle Prose the following at sentencing: _____

PSI: Waived/Not Required ☒ Required/Requested ☐ADJUDICATION: Adjudicate ☒ Withhold ☐ Court's Discretion []

If the Defendant is convicted of possession, sale, trafficking or conspiracy to possess, sell or traffic in any controlled substance, the Court directs the Department of Motor Vehicles and Highway Safety to revoke the Defendant's driver's license for two (2) years. If the Defendant is convicted of grand theft of a motor vehicle; theft of motor vehicle parts; or, any felony in the commission of which a motor vehicle was used, the Court directs the Department of Motor Vehicles and Highway Safety to revoke the Defendant's driver's license as mandated by law. The Clerk is directed to make the proper notifications.

SENTENCE:

\$ _____ Fine \$ _____ Court Costs \$ _____ Drug Trust Fund

\$ _____ Cost of Prosecution \$ _____ Public Defender Fees/Costs

Incarceration: _____ Days _____ Months _____ Years

with credit for time served; which is _____ days.

PROBATION:

18 Months / Years - Drug Offender if checked [] Spay
 ALL CONDITIONS OF PROBATION MUST BE SUCCESSFULLY COMPLETED NO LESS THAN 30 DAYS BEFORE
 PROBATION IS SCHEDULED TO TERMINATE UNLESS STATED BELOW.

STANDARD CONDITIONS OF PROBATION HAVE BEEN EXPLAINED BY DEFENSE COUNSEL.

SPECIAL CONDITIONS OF PROBATION:

- (A) Restitution as per the accompanying order. [] (check if ordered) \$1900.00 Restitution, completes all conditions
 (B) Fine: \$ 50 Court Costs: \$ 311 Drug Trust Fund: \$ 50 \$601.00
 Cost of Prosecution \$ 50 Public Defender Fees/Costs \$ 190 \$1202.00
 (C) Substance abuse evaluation and successful completion of recommended treatment [] (check if ordered) (enroll within 30 days) If in custody, release only to _____
 (D) Random Drug Testing at Defendant's expense [] (check if ordered)
 (E) _____ hours of community service at a rate of no less than _____ hours per month
 (F) Incarceration: _____ Days _____ Months _____ Year
 with credit for time served; which is _____ days. Costs of supervision waived so long as restitution payments current.

OTHER COMMENTS OR CONDITIONS:

to complete Theft a statement course, & to have no contact w/ Hollywood video in Palm Beach County. If finds & agrees that they are in possession of D.S. owned property they are to Relinquish property Back
Hollywood video in Palm Beach County. If finds & agrees that they are in possession of D.S. owned property they are to Relinquish property Back

SENTENCING IS DEFERRED UNTIL _____

THE DEFENDANT UNDERSTANDS IF SHE FAILS TO APPEAR OR IS ARRESTED ON NEW CHARGES, A CAPIAS WILL BE ISSUED AND THE COURT WILL IMPOSE ANY PENDING SENTENCE.

true copy of the record in my office with redactions, if any as required by law.

Assistant State Attorney

SHARON R. BOCK
CLERK & COMPTROLLER

Attorney for the Defendant

Date of Plea

DEPUTY CLERK

Defendant

GM 01206 that property Back

In the Circuit Court of the Fifteenth Judicial Circuit
In and For Palm Beach County, Florida

Case No. 02012206 CF A-2

Division: W

STATE OF FLORIDA

VS.

Anthony Luis Zac Figueroa
Defendant

FILED
Circuit Criminal Department

ORDER MODIFYING PROBATION

THIS cause has come before the Court on the Defendant's Violation of Probation. Upon consideration, it is hereby:

ORDERED AND ADJUDGED that the Defendant's Probation is modified as follows:

probation extended for a period
of 6 months with which time
defendant will undergo a
drug abuse evaluation + commence
any recommended treatment

☒ Defendant admits the Violation of Probation.

☒ All Original terms and conditions to remain in effect.

☐ Defendant is sentenced to _____ days/months Palm Beach County Jail with credit for _____ days.

DONE AND ORDERED this 200 day of May, 2005.



STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office with reductions, if any as required by law.

THIS DAY OF May, 2005

By Sharon R. Bock
CLERK & COMPTROLLER

By [Signature]
DEPUTY CLERK

[Signature]
Circuit Judge

GM_01207

EB MAY 25 2005

PROBABLE CAUSE AFFIDAVIT

1. Arrest
2. N.T.A.3. Request for Warrant
4. Request for CapiasJuvenile ☒

ADMIN	OBT Number		Agency ORI Number FL0500000000		Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE		Agency Report Number 0610211076171	
CHARGES	Charge Type: Check as many as apply.		1. Felony <input checked="" type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other <input type="checkbox"/>		Special Notes:			
	Name (Last, First, Middle) FIGUEROA, Anthony		Alias		Race Wm		Sex M	
VICTIM	Charge Description Grand Theft FSS# 812.014(2c1)		Charge Description		Charge Description		Charge Description	
	Victim's Name (Last, First, Middle) Holly Lynn Uiedo		Local Address (Street, Apt. Number) 13920 Wellington Trace (City) Wellington (State) FL (Zip) 333-0520		Phone (941) 333-0520		Address Source West/comp	
PROBABLE CAUSE STATEMENT	Business Address (Name, Street) Same		(City) (State) (Zip)		Phone ()		Occupation Same	
	<p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.</p> <p><input type="checkbox"/> committed the below acts in my presence.</p> <p><input type="checkbox"/> confessed to admitting to the below facts.</p> <p><input checked="" type="checkbox"/> was observed by JARROD Angeloni who told Det D. Smith that he/she saw the arrested person commit the below acts.</p> <p><input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the _____ day of _____ 20__ at _____ <input type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p> <p>On 8-24-02 it was reported that a Grand Theft had occurred at Holly Lynn Uiedo located at 13920 Wellington Trace in Wellington Fl. The store Manager Philip Papuli advised that they had found that several Uiedo Games had been stolen out of their box and the Box left on the shelf. It was found that the suspect had come into the store while open to the Public and cut the side of their Game box with a sharp object and took the game out of the box leaving the Box on the shelf. Mr Papuli advised that this has occurred several times in the last few weeks. It was found however that on 8-24-02 after inventory that 20 Uiedo Games had been stolen this date. Valued at \$2.00 each and they have all 20 damaged. Mr Papuli advised that on one of the cut boxes that the suspect had cut him self while committing the crimes as on one of the boxes was covered in blood. Mr Papuli advised that the crime was captured on the surveillance camera and he had</p>							
ADMINISTRATIVE	<p>STATE OF FLORIDA COUNTY OF PALM BEACH</p> <p>(Signature of Arresting/Investigative Officer) Det D. Smith #3483</p> <p>(Print name of Arresting/Investigative Officer), who is personally known to me and who produced identification. Type of identification produced: Personally Known</p> <p>Notary Public, Clerk of Court, Officer (F.S.S. 117.10) D/5 Jan Va 6142</p> <p>August 20 02 by Det D. Smith</p> <p>GM_01208 PAGE 3</p>							

OBTS Number		PROBABLE CAUSE AFFIDAVIT		1. Arrest 2. N.T.A.		3. Request for Warrant 4. Request for Capias		Juvenile <input checked="" type="checkbox"/>		
ADMIN	Agency ORI Number FLO 5 0 0 0 0 0	Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE			Agency Report Number 0 6 1 0 2 1 0 7 6 1 7 1 1					
DEF	Charge Type: Check as many as apply: <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other	Special Notes:								
DEF	Name (Last, First, Middle) Laverne, Anthony D.	Alias			Race W		Sex M			
CHARGES	Charge Description Grand Theft FSS 812.04(8)(c)	Charge Description								
VICTIM	Victim's Name (Last, First, Middle) Helen L. Linder	Local Address (Street, Apt. Number) 1320 Wellington Ave Well Fla			City (State) (Zip)		Phone (335) 0520		Address Source Direct/Compel	
VICTIM	Business Address (Name, Street) Scene	City (State) (Zip)			Phone		Occupation Scene			
<p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.</p> <p><input type="checkbox"/> committed the below acts in my presence.</p> <p><input type="checkbox"/> confessed to _____</p> <p><input checked="" type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts.</p> <p><input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the _____ day of _____ 20____ at _____ <input type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p> <p>the video. On 8-30-02 this Detective met with Mr. Appali and two of his Employees. We viewed the video tape and it was found that on the tape the crime was captured and it showed a Wm in long shorts wearing a long shirt picking up the video game box and in some cases putting it under his shirt then using force and then placing the tape back on the shelf. In some cases he is facing the camera and you can see him cutting the box and putting the video game in his pants. Store Employee, Tarek Angeloni also viewed the video tape and gave a sworn statement that the suspect is known to him store Number # 0962516974. This suspect Anthony Figueira who he has known for years. The suspect stated that he worked Home Depot at 814 US and left the store at 18:33 hrs. I obtained also a sworn statement from store manager Mr. Appali advising his store will purchase. It was later found on 8-30-02 that shortly after I left the store interview that Anthony</p>										
ADMINISTRATIVE	<p>STATE OF FLORIDA COUNTY OF PALM BEACH</p> <p>Signature of Arresting Investigative Officer: [Signature] 3453</p> <p>The foregoing [Signature] was sworn to and affirmed and subscribed before me this _____ day of August 20____ by [Signature] 3453</p> <p>(Print name of Arresting Investigative Officer), who is personally known to me and produced identification type: [Signature] 3453</p> <p>Notary Public, Clerk of Court, Officer (F.S.S. 117.10) [Signature] 642</p> <p>GM_01209 PAGE 3</p>									

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION "W" (CGS)

STATE OF FLORIDA

CASE NO. 02CF012206A02
BOOKING NO. 2002343590

vs.

ANTHONY LUIS ZAC FIGUEROA,
W/M, [REDACTED]

ORIGINAL

FILED
OCT 29 11:12:14

INFORMATION FOR:

GRAND THEFT

In the Name and by Authority of the State of Florida:

BARRY E. KRISCHER, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that ANTHONY LUIS ZAC FIGUEROA on or about October 24, 2002, in the County of Palm Beach and State of Florida, did knowingly obtain or use, or endeavor to obtain or use video games of a value of \$300.00 or more, which was the property of HOLLYWOOD VIDEO, or any other person not the defendant(s), with the intent to permanently or temporarily deprive HOLLYWOOD VIDEO or any other person not the defendant(s) of the property or benefit therefrom or to appropriate the property to the use of ANTHONY LUIS ZAC FIGUEROA or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1) and (2)(c). (3 DEG FEL)

Jill Estey Richstone
JILL ESTEY RICHSTONE
FL. BAR NO. 0928933
Assistant State Attorney

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, JILL ESTEY RICHSTONE Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.

Jill Estey Richstone
Assistant State Attorney

Sworn to and subscribed to before me this 29 day of October, 2002.

Ellen Jordan
NOTARY PUBLIC, State of Florida

JER/sw

STATE OF FLORIDA • PALM BEACH COUNTY

FCIC REFERENCE NUMBERS
GRAND THEFT 2002



I hereby certify that the foregoing is a true copy of the record in my office with my COMMISSION # CC799741 EXPIRES December 28, 2002
By *Sharon R. Book*
SHARON R. BOOK
CLERK & COMPTROLLER
DEPUTY CLERK

GM_01211

IN THE CRIMINAL DIVISION OF THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT OF FLORIDA.
IN AND FOR PALM BEACH COUNTY

CASE NO. 02012206 CF A02 DIV. W

OBTs NUMBER _____

STATE OF FLORIDA

☐ COMMUNITY
CONTROL
VIOLATOR

☐ PROBATION
VIOLATOR

01/28/2003 11:36:12 20030047648
OR BK 14720 PG 1937
Palm Beach County, Florida
Dorothy H. Wilken, Clerk

DEFENDANT

W

RACE

M

GENDER

SOCIAL SECURITY NUMBER

FILED

IAN 15 2003

JUDGMENT

DOROTHY H. WILKEN, CLERK
CIRCUIT & COUNTY COURTS

The above Defendant, being personally before this Court represented by

S. Lawrence APB

(attorney)

☐ Having been tried and found guilty of
the following crime(s):

☒

Having entered a plea of guilty to
the following crime(s):

☐ Having entered a plea of nolo
contendere to the following
crime(s):

COUNT	CRIME	OFFENSE STATUTE NUMBER(S)	DEGREE
<u>1</u>	<u>Grand Theft</u>	<u>812.014(1) and (2)(c)</u>	<u>3d</u>

and no cause having been shown why the Defendant should not be adjudicated guilty, IT IS ORDERED THAT the Defendant is hereby
ADJUDICATED GUILTY of the above crime(s).

☐ and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty, regardless of adjudication, to attempts or
offenses relating to sexual battery (ch. 794), lewd and lascivious conduct (ch. 800), or murder (s. 782.04), aggravated battery (s. 784.045),
burglary (s. 810.02), carjacking (s. 812.133), or home invasion robbery (s. 812.135), or any other offense specified in section 943.325, the
defendant shall be required to submit blood specimens.

~~and good cause being shown: IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD~~

SENTENCE
STAYED

☐ The Court hereby stays and withholds imposition of sentence as to count(s) and places the Defendant on
☐ Probation and/or ☐ Community Control under the supervision of the Dept. of Corrections (conditions of probation
set forth in separate order).

SENTENCE
DEFERRED

☐ The Court hereby defers imposition of sentence until _____

The Defendant in Open Court was advised of his right to appeal this Judgment by filing notice of appeal with the Clerk of Court within thirty days
following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance
of counsel in taking said appeal at the expense of the State upon showing of indigency.

DONE AND ORDERED in Open Court at Palm Beach County, Florida, this 15 day of January, 2003

By

CIRCUIT COURT JUDGE

GM_01212

HOY
"W"

DC# W14116
Officer: 15-3

FILED
2003 JAN 23 PM 12:34
DOROTHY H. WILKEN
CLERK OF CIRCUIT COURT
PALM BEACH COUNTY, FL.
In The Circuit Court
of Palm Beach County, Florida
Case No. 02-12206CFA02

JUDGMENT OF GUILT
AND PLACING DEFENDANT ON PROBATION

STATE OF FLORIDA
-vs- Plaintiff
ANTHONY LUIS ZACFIGUEROA
Defendant

This cause coming on this day to be heard before me, and you, the defendant ANTHONY LUIS ZACFIGUEROA, being now present before me, and you having:
PLED GUILTY TO

The offense of COUNT 1. GRAND THEFT the court hereby adjudges you to be guilty of said offense; and

It appearing to the satisfaction of the Court that you are not likely again to engage in a criminal course of conduct, and that the ends of justice and the welfare of society do not require that you should suffer the penalty authorized by law:

Now, therefore, it is ordered and adjudged that the imposition of sentence are hereby withheld, and that you are hereby placed on probation for a period of EIGHTEEN (18) MONTHS CONCURRENT WITH 02-12205CFA02 under the supervision of the Department of Corrections and its Officers, such supervision to be subject to the provisions of the laws of this State.

It is further order that you shall comply with the following conditions of probation:

- (1) Not later than the fifth day of each month or as directed, you will make a full and truthful report to your Probation Officer on the form provided for that purpose.
- (2) You will pay to the State of Florida the amount of \$ 50.00 FIFTY DOLLARS per month, plus a 4% surcharge, toward the cost of your supervision, unless otherwise exempted in compliance with Florida Statutes.
- (3) You will not change your residence or employment or leave the county of your residence without first procuring the consent of your Probation Officer.
- (4) You will neither possess, carry or own any weapons or firearm without first securing the consent of your Probation Officer.

GM_01213



ZacFiguerroa, Anthony
Case # 02-12206CFA02

- (5) You will live and remain at liberty without violating any law. A conviction in a court of law shall not be necessary in order for such a violation to constitute a violation of your probation.
- (6) You will submit to Urinalysis, Breathalyzer or Blood tests, as directed by your Probation Officer or the Professional Staff of any treatment center where you may be receiving treatment, to determine the possible use of alcohol, drugs or controlled substances.
- (7) You will make a good faith effort to obtain lawful employment and support any dependents to the best of your ability as directed by your Probation Officer.
- (8) You will promptly and truthfully answer all inquiries directed to you by the Court or the Probation Officer, and allow the Officer to visit in your home, at your employment site, or elsewhere, and you will comply with all instructions he may give you.
- (9) RESTITUTION TO: HOLLYWOOD VIDEO IN THE AMOUNT OF \$1000.00 MINIMUM PAYMENT OF \$55.56 PER MONTH – CRO FILED
- (10) NO CONTACT WITH HOLLY VIDEO IN PALM BEACH CO.
- (11) ENTER AND COMPLETE: THEFT ABATEMENT PROGRAM
- (12) AUTOMATIC EARLY TERMINATION AFTER 12 MONTHS PROVIDED ALL CONDITIONS ARE SATISFIED

You are hereby placed on notice that the Court may at any time rescind or modify any of the conditions of your probation, or may extend the period of probation as authorized by law, or may discharge you from further supervision; and that if you violate any of the conditions of your probation, you may be arrested and the Court may revoke your probation and impose any sentence which it might have imposed before placing you on probation.

It is further ordered that when you have reported to the Probation Officer and have been instructed as to the conditions of probation you shall be released from custody if you are in custody and if you are at liberty on bond, the sureties thereon shall stand discharged from liability.

ZacFigueroa, Anthony
Case # 02-12206CFA02

It is further ordered that the Clerk of this Court file this order in his office, record the same in the Minutes of the Court, and forthwith provide certified copies of same to the Probation Officer for his use in compliance with the requirements of law.

DONE AND ORDERED IN OPEN COURT THIS 15TH DAY OF JANUARY, 2003.

Signed this 22 day of January, 2003. John J. H...
JUDGE

I acknowledge receipt of a certified copy of this order and that the conditions have been explained to me.

Date: _____ Probationer _____

Instructed by: _____

Original: Court
Copies: Probationer/File

DC4-900A

JF 1/16/03



STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.

THIS 22 DAY OF January, 2003

SHARON R. BOCK
CLERK & COMPTROLLER

By Shawver
DEPUTY CLERK

In the Circuit Court of the Fifteenth Judicial Circuit
In and For Palm Beach County, Florida

Case No. 02012205CF A02
Division: W

STATE OF FLORIDA

VS.

Anthony Luis Zac Figueroa
Defendant

FILED
Circuit Criminal Department

ORDER MODIFYING PROBATION

THIS cause has come before the Court on the Defendant's Violation of Probation. Upon consideration, it is hereby:

ORDERED AND ADJUDGED that the Defendant's Probation is modified as follows:

probation extended for a period
of 6 months with which time
defendant will undergo a
drug abuse evaluation + commence
any recommended treatment

- ☒ Defendant admits the Violation of Probation.
- ☒ All Original terms and conditions to remain in effect.
- ☐ Defendant is sentenced to _____ days/months Palm Beach County Jail with credit for _____ days.

DONE AND ORDERED this 20th day of May, 2005.



I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.

THIS 20th DAY OF May, 2005
SHARON R. BOCK
CLERK & COMPTROLLER

By [Signature]
DEPUTY CLERK

[Signature]
Circuit Judge

CM_01216

MAY 24 2005

EB

33

PRSO #14 CHEV 840

OBTS Number		PROBABLE CAUSE AFFIDAVIT		1. Arrest 2. N.T.A.		3. Request for Warrant 4. Request for Capias		Juvenile	
Agency ORI Number FLD 5 0 0 0 0 0		Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE		Agency Report Number 0 6 10 2 1 2 8 8 2 1 1 1		Special Notes:			
Charge Type: Check as many as apply		1. Felony 2. Traffic Felony		3. Misdemeanor 4. Traffic Misdemeanor		5. Ordinance 6. Other			
Name (Last, First, Middle) Figueroa, Anthony		Alias		Race W		Sex M			
Charge Description Grand Theft		Charge Description		Charge Description		Charge Description			
Victim's Name (Last, First, Middle) Hollywood Video		Local Address (Street, Apt. Number) 13920 Wellington Trace Wellington FL 33414		Phone ()		Address Source			
Business Address (Name, Street) 13920 Wellington Trace Wellington FL 33414		Phone ()		Occupation					
<p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.</p> <p><input checked="" type="checkbox"/> committed the below acts in my presence.</p> <p><input type="checkbox"/> confessed to admitting to the below facts.</p> <p><input checked="" type="checkbox"/> was observed by Philip Napuli who told D/s Van Dusen that he/she saw the arrested person commit the below acts.</p> <p><input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the 19 day of October 2002 at 600 A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p>									
<p>I responded to Hollywood Video located at 13920 Wellington Trace in Palm Beach County in response to a shoplifting call. P.B.S.O. dispatch was advised by store manager Philip Napuli that two white males were stuffing the pockets of their shorts with video games. These w/m later identified as Anthony Figueroa and [redacted] were caught on video surveillance which has been entered into P.B.S.O. evidence. These 2 subjects were apprehended by myself and D/s Conley leaving the store. The subjects had 7 video games in the pockets of their shorts. (3 playstation 2, 3 X Box and 1 Gamecube). These games totaled \$350.00. Also these 2 subjects were identified by Napuli as they were leaving the store. It should be noted that Anthony Figueroa was apprehended attempting to enter his vehicle. He did have the driver side door open and was getting in. Upon search of his vehicle which was taken for forfeiture 6 other video games were found without receipts. These were placed into evidence. Store manager told me that [redacted] came to the counter and asked a clerk questions in an attempt to distract him while Figueroa left the store. [redacted] then also left neither subject made any attempt to pay for the games. Based upon the above described investigation I believe [redacted] is a true copy of the record in my office with [redacted] as required by law.</p>									
STATE OF FLORIDA COUNTY OF PALM BEACH		Signature of Arresting Investigative Officer [Signature]		Date of Arrest OCTOBER 19 2002		By ARON R. ROCK CLERK & COMPTROLLER		VAN DUSEN	
The foregoing instrument was sworn to or affirmed and subscribed before me this		Signature of Notary Public, Clerk of Court, Officer (F.S.S. 117.10)		Notary Public, Clerk of Court, Officer (F.S.S. 117.10)		DEPUTY CLERK		GM_01218 PAGE 2 OF 2	


IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CRIMINAL DIVISION

DS JASON VANDUSEN, 6142
PALM BEACH COUNTY SHERIFFS OFFICE
Agency case number 02-128821

CASE NO. 02CF012204A99
Booking No. 2002343586

STATE OF FLORIDA

vs.

ANTHONY LUIS ZAC FIGUEROA, W/M, 

FILED
02 OCT 29 PM 12:14
CLERK OF THE COURT
Palm Beach County, Florida

NO FILE FOR:

GRAND THEFT

The State enters a no-file because the elements of the crime cannot be proven beyond a reasonable doubt.

BARRY E. KRISCHER, STATE ATTORNEY

DATE: October 28, 2002

By: 

JILL ESTEY RICHSTONE
Assistant State Attorney
FL. BAR NO. 0928933

JER/sw

CLERK AND SHERIFF TO RESCIND NO CONTACT ORDER

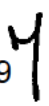


STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office with exceptions, if any as required by law.

THIS 28 DAY OF October, 2002
SHARON R. BOCK
CLERK & COMPTROLLER

By: 
DEPUTY CLERK

GM_01219 

ADMIN	OBTS Number	PROBABLE CAUSE AFFIDAVIT		1. [Redacted]	3. Request for Warrant	1	Juvenile
DEE	Agency ORI Number FLO 5 0 2 8 0 0	Agency Name ROYAL PALM BEACH POLICE DEPARTMENT		Agency Report Number 8 6 - 0 0 3 8 1 2			
CHARGES	Charge Type: Check as many as apply.		<input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other		Special Notes:		
VICTIM	Name (Last, First, Middle) Figueroa, Anthony Luis Zac		Alias		Race W	Sex M	[Redacted]
	Charge Description Grand Theft Auto		Charge Description				
	Charge Description		Charge Description				
	Victim's Name (Last, First, Middle) Figueroa, Richard Jr.		Race W		Sex M	[Redacted]	
	Business Address (Name, Street)		(City)	(State)	(zip)	Phone	Address
			(City)	(State)	(zip)	Phone	Occupation
The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. The Person taken into custody ... <input checked="" type="checkbox"/> committed the below acts in my presence. <input type="checkbox"/> confessed to _____ admitting to the below facts. <input type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts. <input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation. On the 22nd day of October 20 00 at 12:27 <input checked="" type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)							
I met with victim Richard Figueroa, Jr., who told me that he allowed his brother, Anthony, to use his 1986 Mazda pick-up truck to drive a friend home to Okeechobee Blvd. and Cherry Road at about 8pm, on 10/21/00. Richard told me that he has always been very specific about the times and use he allows his brother to use the truck, to the extent that he has told Anthony that if the truck were not brought back in the allotted time, he would call the police and report the truck stolen. For this trip, Anthony told Richard he would be back in 30 minutes. At about 10:15pm, Anthony called Richard to say that the truck had a flat tire, and that he would be right home. Richard asked Anthony where he was and Anthony would not say. At about 12:22am, on 10/22/00, Richard called the police department to report the truck stolen.							
I explained the seriousness about reporting a vehicle stolen, to the extent that is covered on the stolen vehicle affidavit. Richard filled-out this form and signed the same without any hesitation. Richard further stated that he had to be at work in the morning and was concerned since he needed the vehicle to get there.							
At about 01:55am, Officer T.E. Murphy located and stopped this vehicle, near Huntington Woods and Royal Palm Beach Boulevard. Driving was a [Redacted] and Anthony was in the passenger's seat. I responded to this location where the two were still inside the vehicle. Both subjects were placed under arrest for Grand Theft Auto. Anthony Figueroa, since he first had possession of the vehicle, depriving the victim of the same, and Luckett, for being in actual physical control of the vehicle, also depriving the victim use of his vehicle.							
When the victim arrived to reclaim his vehicle, he inspected the tires and believed that they were the original tires and could not detect any evidence of a flat tire or use of a spare tire. He further wrote me another written statement, indicating to me that Luckett never had permission to drive his truck.							
Figueroa went to the County Jail and [Redacted] went to the Juvenile Assessment Center.							
<div style="display: flex; justify-content: space-between;"> <div style="width: 40%;"> <p style="text-align: center;">FILED</p> <p style="text-align: center;">OCT 23 AM 6:52</p> <p style="text-align: center;">JONNY H. WILKINSON, CLERK</p> <p style="text-align: center;">CLERK OF COURT</p> </div> <div style="width: 50%; text-align: center;"> <p>STATE OF FLORIDA - PALM BEACH COUNTY</p> <p>I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.</p> <p>THIS DAY OF August 2016</p> <p>SHARON R. BOCH</p> <p>CLERK & COMPTROLLER</p> <p>By [Signature]</p> <p>DEPUTY CLERK</p> </div> </div>							
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>SWORN AND SUBSCRIBED BEFORE ME</p> <p>[Signature]</p> <p>NOTARY PUBLIC / CLERK OF COURT / POLICE OFFICER</p> <p>10-22-00</p> <p>DATE</p> </div> <div style="width: 50%;"> <p>[Signature]</p> <p>SIGNATURE OF ARRESTING / INVESTIGATING OFFICER</p> <p>Eli Shaivitz #70</p> <p>NAME OF OFFICER (PLEASE PRINT)</p> <p>10-22-00</p> <p>DATE</p> </div> </div>							
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>DISTRIBUTION: WHITE -- Court Copy GREEN -- State Attorney YELLOW -- Agency PINK -- Agency GOLDENROD --</p> </div> <div style="width: 50%; text-align: right;"> <p>PAGE 1 OF 1</p> <p>GM 012</p> </div> </div>							

OBTS Number		PROBABLE CAUSE AFFIDAVIT		1. Request for Warrant		2. Request for Capias		3. Juvenile	
Agency ORI Number FLO 5 0 2 8 0 0		Agency Name ROYAL PALM BEACH POLICE DEPARTMENT		Agency Report Number 816 0 0 3 8 1 2					
Charge Type: Check as many as apply.		<input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other		Special Notes:					
Name (Last, First, Middle) Figueróa, Anthony Luis Zac		Alias		Race W		Sex M			
Charge Description Grand Theft (Auto)		Charge Description							
Charge Description		Charge Description							
Victim's Name (Last, First, Middle) Figueróa, Richard Jr				Race W		Sex M			
(zip)		Phone		Address					
(zip)		Phone		Occupation					
The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. The Person taken into custody ... <input checked="" type="checkbox"/> committed the below acts in my presence. <input type="checkbox"/> confessed to _____ admitting to the below facts. <input type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts. <input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation. On the 22nd day of October 20 00 at 1:55 <input checked="" type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)									
ADDITIONAL PROBABLE CAUSE: At above date and time, I was southbound in the 1300 block of Royal Palm Beach Blvd. when I observed a white and maroon Mazda pickup truck driving north on Royal Palm Beach Blvd. Ofc. Eli Shaivitz had earlier taken a stolen vehicle report on a truck which matched this description. I caught up to the truck and saw that it had Florida tag number D61XWE. This was the tag number of the stolen truck. I stopped the truck in the 100 block of Sherwood Dr. I found _____ W/M _____ to be the driver and Anthony Luis Zac Figueróa W/M _____ to be the passenger. Anthony Figueróa is the brother of the owner and was the original suspect in the stolen car case. Both subjects were taken into custody, secured, and placed in my patrol unit. I transported the to the police station where they were turned over to Ofc. Eli Shaivitz.									
STATE OF FLORIDA - PALM BEACH COUNTY I hereby certify that the foregoing is a true copy of the record in my office with corrections if any as required by law. THIS <u>8th</u> DAY OF <u>August</u> 20 <u>16</u> SHARON R. BOCK CLERK & COMPTROLLER By <u>[Signature]</u> DEPUTY CLERK									
SWORN AND SUBSCRIBED BEFORE ME <u>[Signature]</u> NOTARY PUBLIC / CLERK OF COURT / POLICE OFFICER 10-22-00 DATE									
SIGNATURE OF ARRESTING / INVESTIGATING OFFICER T. E. Murphy #100 NAME OF OFFICER (PLEASE PRINT) 10-22-00 DATE									
PAGE OF									

Arrest#	2000346620	Bond#	P07-00274775	Type	SB-PN	\$ 3,000	A/C
---------	------------	-------	--------------	------	-------	----------	-----

Before the Court for:

☐ Deft ☐ Indigent ☐ PD Appt ☐ Hrg only ☐ PD Pres _____ ☐ Court Appts _____
 Evaluation for: ☐ Drug Farm ☐ DOC Non-Secure Bed by _____
☐ Pre-Plea ☐ PSI ordered by/within _____ days ☐ w/input from DJJ / Staffing _____

☐ FOUND & ADJ NOT GUILTY as to Cts _____ ☐ Dismiss ☒ Nolle Prose Cts _____

☐ SEE ORDER ASSESSING COSTS ☐ SEE REVERSE SIDE FOR INSTRUCTIONS REGARDING FURTHER HEARING

☐ W/Credit for _____ Days / Mos. / Yrs. ☐ Deft Remanded ☐ Deft to remain on same rel. status pending sent.
Conc / Consec / Co-Term w/cases / cts: _____

☐ Youthful Off ☐ Habitual Off ☐ Min / Mand: _____ as to Cts

☐ ABOVE SENTENCE TO BE FOLLOWED BY: ☐ Probation ☐ Drug Off Prob ☐ Comm. Control ☐ I ☐ II - See Page 2

I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.

Set / Remains Set / Reset _____ Rm _____ at _____ AM/PM

[illegible]

☐ Deft sign _____

☐ Def Co _____ ☐ ASA _____ By DEPUTY CLERK ☐ Bondsman _____

☐ Prob ☐ Jail ☐ DJJ ☐ GAL ☐ Bondsman _____
☒ County Courthouse
 205 N. Dixie, West Palm Beach
 Notified by mail by: _____ on ____/____/____
☐ Courtroom, Criminal Justice Bldg. 38844 State Road 80, Belle Glade
☐ Courtroom, Criminal Justice Complex 3228 Gun Club Rd., West Palm Beach

IF YOU ARE A PERSON WITH A DISABILITY WHO NEEDS ANY ACCOMMODATION IN ORDER TO PARTICIPATE IN THIS PROCEEDING, YOU ARE ENTITLED, AT NO COST TO YOU, TO THE PROVISION OF CERTAIN ASSISTANCE. PLEASE CONTACT THE ADMINISTRATIVE OFFICE OF THE COURT - 206 NORTH DIXIE HIGHWAY, ROOM 5.2500, WEST PALM BEACH, FL 33401- TELEPHONE (561) 355-2431, WITHIN 2 WORKING DAYS OR YOUR RECEIPT OF THIS NOTICE. IF YOU ARE HEARING IMPAIRED, CALL 1-800-955-5771; IF VOICE IMPAIRED, 1-800-955-8770

EXHIBIT GG

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 21, 2016

9:17 a.m.

C O N F I D E N T I A L

Deposition of JOSEPH RECAREY, pursuant
to notice, taken by Plaintiff, at the
offices of Boies Schiller & Flexner, 401
Las Olas Boulevard, Fort Lauderdale, Florida,
before Kelli Ann Willis, a Registered
Professional Reporter, Certified Realtime
Reporter and Notary Public within and
for the State of Florida.

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3

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15

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Boies Schiller & Flexner

17

Ryan Kick, Videographer

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1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Most of the events that we are going to
3 discuss today occurred, at least the investigation
4 that we're going to discuss today, occurred in 2005
5 and 2006.

6 So can you just tell us what your position
7 was with the Palm Beach Police Department at that
8 time?

9 A. I was a police detective.

10 Q. And did you investigate a person by the
11 name of Jeffrey Epstein?

12 A. I did.

13 Q. All right.

14 What was your role in the investigation of
15 Jeffrey Epstein?

16 A. I was the lead detective once the case was
17 turned over to me by Michelle Pagan.

18 Q. Okay. And as the lead detective, did you
19 review all of the history of the investigation up to
20 the point it was turned over to you?

21 MR. PAGLIUCA: Object to form and
22 foundation.

23 THE WITNESS: Correct.

24 BY MR. EDWARDS:

25 Q. And was that one of your jobs as the lead

1 JOSEPH RECAREY - CONFIDENTIAL

2 investigator over a case, is to acclimate yourself
3 to the history of the case?

4 MR. PAGLIUCA: Object to form and
5 foundation.

6 THE WITNESS: Yes.

7 BY MR. EDWARDS:

8 Q. Just so that the record is clear, will you
9 just give a brief pause in case Mr. Pagliuca has an
10 objection?

11 A. All right.

12 Q. So they can also capture your answer.

13 A. Okay.

14 Q. In reviewing the history of the case, did
15 you review prior police reports, police reports
16 prior to you becoming involved personally?

17 A. I did.

18 Q. Okay. And I've handed you what is marked
19 as Plaintiff's Exhibit 1.

20 (The referred-to document was marked by
21 the court reporter for Identification as
22 Deposition Exhibit 1.)

23 BY MR. EDWARDS:

24 Q. Do you recognize that?

25 A. Yes.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Police Department incident report as suspects?

3 MS. SCHULTZ: Object to form and

4 foundation.

5 BY MR. PAGLIUCA:

6 Q. These people, right?

7 A. At that time, yes.

8 Q. Well, and then are you aware -- were there
9 any suspects added in any subsequent reports, to
10 your knowledge?

11 A. Not that I'm aware of.

12 Q. In fact, you did not seek a probable cause
13 warrant for any other suspects in this case,
14 correct?

15 MS. SCHULTZ: Object to form and

16 foundation.

17 THE WITNESS: That's correct.

18 BY MR. PAGLIUCA:

19 Q. And Ms. Ghislaine Maxwell is not listed in
20 any of your Palm Beach Police Department incident
21 reports as a suspect in this case, correct?

22 MS. SCHULTZ: Object to form and

23 foundation.

24 THE WITNESS: Not -- no, not as a suspect
25 in this case, no.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Exhibit 1. Are you with me?

3 A. Uh-huh.

4 Q. Okay. Again, this was information that
5 was obtained by Detective Pagan, correct?

6 A. Correct.

7 Q. And it's true, is it not, that this
8 alleged victim never claimed to have been recruited
9 by Ghislaine Maxwell; true?

10 MS. SCHULTZ: Object to form and
11 foundation.

12 THE WITNESS: Correct.

13 BY MR. PAGLIUCA:

14 Q. And this individual, alleged victim No. 1,
15 never identified Ghislaine Maxwell as being at
16 Mr. Epstein's house when she was there, correct?

17 MS. SCHULTZ: Object to form and
18 foundation.

19 THE WITNESS: I don't believe so.

20 BY MR. PAGLIUCA:

21 Q. You don't believe so --

22 A. I don't believe so.

23 Q. That she ever identified Ghislaine Maxwell
24 as being in the house?

25 A. Right.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Okay. She never -- this individual,
3 victim No. 1, never claimed that Ghislaine Maxwell
4 paid her any money, correct?

5 A. Correct.

6 Q. And this individual No. 1 never claimed
7 that Ms. Maxwell instructed her what to wear,
8 correct?

9 A. Right.

10 Q. This individual never claimed that
11 Ghislaine Maxwell told her how to act, correct?

12 A. Correct.

13 Q. This individual never claimed to have met
14 Ghislaine Maxwell ever, correct?

15 A. I don't believe so, no.

16 Q. This individual never claimed to even have
17 spoken to Ghislaine Maxwell ever, correct?

18 A. I don't believe so, no.

19 Q. And when you say "I don't believe so, no,"
20 that means my statement to you is correct; is that
21 right?

22 MS. SCHULTZ: Object to form, foundation.

23 THE WITNESS: Well, you're saying "ever."

24 I don't know if she's ever, ever spoken to --

25

1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. PAGLIUCA:

3 Q. To Detective Pagan.

4 A. Right. To my knowledge, I don't know,
5 because Detective Pagan is the one who actually
6 interviewed her. So I don't know to the answer of
7 "ever." So not to my knowledge.

8 Q. Certainly, nothing in Exhibit 1, Narrative
9 1 reflects that this individual ever met or talked
10 to or spoke to Ghislaine Maxwell, right?

11 A. Right. Not to my knowledge.

12 Q. And, indeed, you would agree with me that
13 if this individual claimed that Ms. Maxwell had
14 something to do with the events listed in Narrative
15 1, you would have folded up on it, as the
16 investigating detective, right?

17 MS. SCHULTZ: Object to the form.

18 THE WITNESS: Either myself or Detective
19 Pagan would have.

20 BY MR. PAGLIUCA:

21 Q. Sure. And when you got the case six
22 months later, if there hadn't been follow-up, you
23 would have followed up on it, right?

24 MS. SCHULTZ: Object to form.

25 THE WITNESS: Correct.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Okay. The person alleged to have brought
3 the alleged victim No. 1 to Mr. Epstein's house is
4 this Hayley Robson individual, correct?

5 A. Yes.

6 Q. Okay. Then with regard to alleged victim
7 No. 2, then this individual did not claim to have
8 been recruited by Ms. Maxwell, correct?

9 MS. SCHULTZ: Object.

10 THE WITNESS: Who would be victim No. 2?

11 BY MR. PAGLIUCA:

12 Q. Well, you can either go to the second page
13 of Exhibit 1 and we can just follow down the victim
14 information, or you can go to the body of the
15 report, whichever is easier for you.

16 MS. SCHULTZ: Can you use the initials?

17 MR. PAGLIUCA: Sure. I can call them 1 or
18 AH or whatever you want to call them. That's
19 fine with me.

20 BY MR. PAGLIUCA:

21 Q. So I'll just say alleged victim AH never
22 claimed to have been recruited by Ms. Maxwell,
23 correct?

24 A. Correct.

25 Q. And alleged victim AH did not claim to

1 JOSEPH RECAREY - CONFIDENTIAL

2 have spoken to Ms. Maxwell ever, correct?

3 MS. SCHULTZ: Object to form.

4 THE WITNESS: It's been a while since I
5 read this report.

6 BY MR. PAGLIUCA:

7 Q. Sure. Is it fair to say, Detective, that
8 this investigation occurred some 12 years ago,
9 right?

10 A. Yeah. Well, yeah.

11 Q. And is it fair to say that you've
12 conducted quite a few investigations over your
13 career?

14 A. Yes.

15 Q. All right.

16 And it's fair to say that it would be
17 impossible for you to remember all the details of
18 this investigation as you sit here today, correct?

19 A. Correct.

20 Q. And you've been referring to Exhibit 1
21 frequently throughout this deposition, correct?

22 A. Yes.

23 Q. And that's because you don't have any
24 present memory of these details, correct?

25 MS. SCHULTZ: Object to form, foundation.

1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: I have some recollection,
3 but I'm not going to have exact dates and times
4 off the top of my head.

5 BY MR. PAGLIUCA:

6 Q. Sure.

7 A. You know, I spoke to over 33 girls
8 regarding this case. So when you say an initial, it
9 takes me a little while to go through the entire
10 list. But to have specifics, I'm not going to be
11 able to remember the exact specifics of -- of the
12 report.

13 Q. I appreciate that.

14 So we can take our time, but do you
15 recall, did AH ever identify Ms. Maxwell has someone
16 she spoke to?

17 A. I don't recall.

18 Q. You don't recall at all?

19 A. I don't recall that she had mentioned
20 Ms. Maxwell.

21 Q. And if she had, you would have put that in
22 your report, correct?

23 A. I believe so, yes, I would have.

24 Q. All right.

25 And so the absence of alleged victim AH

1 JOSEPH RECAREY - CONFIDENTIAL

2 referring to Ms. Maxwell means that she didn't,
3 right?

4 MS. SCHULTZ: Object to form.

5 THE WITNESS: Say the question one more
6 time.

7 BY MR. PAGLIUCA:

8 Q. When we go through this report, and I've
9 gone through it, if any of the alleged victims had
10 identified Ms. Maxwell as someone that they spoke to
11 at Mr. Epstein's house, you would have listed that
12 in your report, right?

13 MS. SCHULTZ: Object to form.

14 THE WITNESS: I believe I would have, yes.

15 BY MR. PAGLIUCA:

16 Q. Yeah.

17 You tried to be thorough and accurate when
18 you were writing your reports, right?

19 A. Yes.

20 Q. And, certainly, you've indicated on direct
21 examination that the identity of people who were at
22 the house was something that was important to your
23 investigation, correct?

24 A. Yes.

25 Q. And that's why you did trash pulls, right?

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. Yes.

3 Q. And then you asked various individuals who
4 was there when you went to Mr. Epstein's house,
5 right?

6 A. Correct.

7 Q. And you then, to the best of your ability,
8 recorded those answers, I take it, as to who was
9 there, right?

10 A. Yes.

11 Q. And with regard to AH, she never said
12 anything about Ghislaine Maxwell being at
13 Mr. Epstein's house, did she?

14 MS. SCHULTZ: Object to form and
15 foundation.

16 BY MR. PAGLIUCA:

17 Q. To you?

18 A. I don't believe she did.

19 Q. Okay. And if she did, it's likely that
20 you would have recorded it, correct?

21 A. Correct, and it would be on the -- it
22 would be on the tape.

23 Q. Right.

24 She never claimed, AH, that Ms. Maxwell
25 paid her, right?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form and
3 foundation.

4 THE WITNESS: Correct.

5 BY MR. PAGLIUCA:

6 Q. She never claimed that -- AH never claimed
7 that Ms. Maxwell instructed her about what to wear,
8 correct?

9 MS. SCHULTZ: Object to the form.

10 THE WITNESS: Correct.

11 BY MR. PAGLIUCA:

12 Q. AH never claimed that Ms. Maxwell told her
13 how to act at Mr. Epstein's house, correct?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: Correct.

16 BY MR. PAGLIUCA:

17 Q. AH never claimed to have met Ghislaine
18 Maxwell anywhere, correct?

19 MS. SCHULTZ: Object to form.

20 THE WITNESS: I don't believe so, no.

21 BY MR. PAGLIUCA:

22 Q. Okay. If we go on to individual alleged
23 victim No. 3, AY, the same question: AY never
24 identified Ms. Maxwell as someone she knew or
25 interacted with in any fashion, correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form.

3 THE WITNESS: No.

4 BY MR. PAGLIUCA:

5 Q. No, she did not?

6 A. No, she did not.

7 Q. Okay. The same with individual No. 4,
8 alleged victim FP: Again, FP never claimed to have
9 met with Ms. Maxwell, correct?

10 MS. SCHULTZ: Object to form and
11 foundation.

12 THE WITNESS: I don't believe so, no.

13 BY MR. PAGLIUCA:

14 Q. Okay. And FP never identified Ms. Maxwell
15 as someone being at Mr. Epstein's house, correct?

16 MS. SCHULTZ: Object to form and
17 foundation.

18 BY MR. PAGLIUCA:

19 Q. And if you need to look at your report --

20 A. No, I don't -- I don't believe so. The
21 only people that recalled Ghislaine at the house
22 was --

23 Q. Sjoberg?

24 A. Johanna Sjoberg.

25 Q. Who was over the age of 18, correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form and
3 foundation.

4 THE WITNESS: And Venero, Christina
5 Venero.

6 BY MR. PAGLIUCA:

7 Q. Who is an adult as well?

8 MS. O'CONNOR: Object to form.

9 THE WITNESS: Yes.

10 BY MR. PAGLIUCA:

11 Q. So out of your entire report, the only two
12 people who ever said anything about Ms. Maxwell were
13 Ms. Sjoberg, who I believe was 23 when you
14 interviewed her?

15 A. Right, but she was --

16 MS. SCHULTZ: Object to form and
17 foundation.

18 THE WITNESS: She was -- she had worked
19 there for quite some time, so you would have to
20 back up, I think, a year or two.

21 BY MR. PAGLIUCA:

22 Q. She was an adult when she worked there?

23 A. Right. She was over the age of 18, right,
24 let's put it that way.

25 Q. And she was not listed by you as a victim

1 JOSEPH RECAREY - CONFIDENTIAL

2 as part of this case, right?

3 A. Correct, because it was between two
4 consenting adults.

5 Q. Exactly.

6 And so that's Ms. Sjoberg, and then the
7 other individual, I think you said Bolero; is that
8 right?

9 A. Venero, Christina Venero. She's a --

10 Q. Adult masseuse, correct?

11 A. Yes. I remember she had lots of tattoos.

12 Q. Tatts, right.

13 But the 17 individuals that you listed in
14 Exhibit 1, none of those individuals ever said the
15 word -- the words "Ghislaine Maxwell" during the
16 course of this investigation to you, correct?

17 MS. SCHULTZ: Object to form and
18 foundation.

19 THE WITNESS: I don't believe so. It
20 would be on the tapes if they did.

21 BY MR. PAGLIUCA:

22 Q. Well, or it would be in your report,
23 right?

24 MS. SCHULTZ: Object to form and
25 foundation.

1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: Either in the report or on
3 the tapes.

4 BY MR. PAGLIUCA:

5 Q. That's an interesting point, so let's talk
6 about that for a moment.

7 This report, this Palm Beach Police
8 Department incident report, Exhibit 1, is a summary
9 of your investigation, correct?

10 A. Correct.

11 Q. And these recitations of your interviews
12 are abbreviated summaries, correct?

13 A. Correct.

14 Q. And so you're typing into this report
15 parts of it but not every word verbatim into the
16 report, correct?

17 A. Right.

18 Q. And, again, the originals of these tapes
19 are somewhere with the FBI at this point, correct?

20 MS. SCHULTZ: Object to form and
21 foundation.

22 THE WITNESS: Correct. Or at the State
23 Attorney's Office.

24 BY MR. PAGLIUCA:

25 Q. Are you aware of any of these originals

1 JOSEPH RECAREY - CONFIDENTIAL

2 That would be one. Probably victim JB would be
3 another. I believe there was a victim ML, as well.

4 Q. Let me ask this question: As you sit here
5 today, do you know who the subjects of the four
6 counts that are referenced on the first page of
7 Exhibit 7 are?

8 A. If I went through the entire PC affidavit,
9 I could -- I could tell you who. But I just named
10 three.

11 Q. Okay.

12 A. So, like I said, I can go through it and
13 tell you who exactly those four counts were for.

14 Q. Okay. We are limited to four, though,
15 right?

16 A. Four instances.

17 MS. SCHULTZ: Object to form.

18 BY MR. PAGLIUCA:

19 Q. Right.

20 And then throughout this entire 22-page,
21 Palm Beach Police Department affidavit,
22 Ms. Maxwell's name does not appear in here once,
23 does it?

24 MS. SCHULTZ: Object to form.

25 THE WITNESS: I don't believe so, no.

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. Correct.

3 Q. And then Mr. Epstein is arrested and ends
4 up pleading guilty and all of that, right?

5 MS. SCHULTZ: Object to form.

6 THE WITNESS: I think there was a
7 non-prosecution agreement prepared between the
8 Feds and some kind of agreement was made. But,
9 yes, he did end up pleading guilty.

10 BY MR. PAGLIUCA:

11 Q. All right.

12 Now, based on the questions that were
13 asked of you in the grand jury, it's fair to say
14 that Ms. Maxwell was not a target of the grand
15 jury's investigation, correct?

16 MS. SCHULTZ: Object to form and
17 foundation.

18 THE WITNESS: Not based on the questions
19 that the state was asking me, no, the state
20 wasn't...

21 BY MR. PAGLIUCA:

22 Q. In fact, it's fair to say that you never
23 said Ms. Maxwell's name in the grand jury, right?

24 MS. SCHULTZ: Object to form and
25 foundation.

1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: No. Based on the questions
3 that the state was asking, no.

4 BY MR. PAGLIUCA:

5 Q. Were you aware of who was being issued
6 subpoenas by the grand jury?

7 A. No. But it wasn't the actual subpoena
8 from the grand jury; it came from the State
9 Attorney's Office.

10 Q. At the direction of the grand jury,
11 though, right?

12 MS. SCHULTZ: Object to form and
13 foundation.

14 THE WITNESS: I don't know. Again, I
15 don't know.

16 BY MR. PAGLIUCA:

17 Q. I would like to talk a little bit about
18 the surveillance that you initiated at Mr. Epstein's
19 house, okay?

20 Can you tell me when the surveillance
21 began?

22 A. It would have started under Detective
23 Pagan and gone through --

24 Q. The entire investigation?

25 A. Pretty much trash pulls. We stopped the

1 JOSEPH RECAREY - CONFIDENTIAL

2 actual physical surveillance sometime during the
3 investigation. But it would have started under
4 Pagan.

5 Q. Okay. Do you recall in what -- well, how
6 was surveillance conducted, if you recall?

7 A. I didn't conduct it personally, no. That
8 would have been under plainclothes unit team. They
9 would have sent out a vehicle and recorded vehicles
10 coming and going and actual physical surveillance.

11 Q. So physical surveillance means eyes on the
12 property, correct?

13 A. Right.

14 Q. And eyes on the property by a police
15 officer, correct?

16 A. Correct.

17 Q. And that police officer would be charged
18 with the obligation of recording the incomings and
19 outgoings of people to the property, correct?

20 A. Correct.

21 Q. Is there a log that's maintained during
22 surveillance?

23 A. I'm not sure who -- if there was a log or
24 not. I know that they set up a vehicle with cameras
25 facing -- facing Epstein's residence.

1 JOSEPH RE CAREY - CONFIDENTIAL

2 Q. And so these were video cameras?

3 A. Correct.

4 Q. And so whoever was coming and going,
5 whenever -- an officer saw somebody coming or going,
6 they would videotape that person; is that correct?

7 A. Or they would just leave the video
8 rolling, time lapse.

9 Q. And did you have the opportunity to
10 observe any of that video?

11 A. I did observe a couple, but the person who
12 actually set it up would review it and then submit a
13 supplement to the report.

14 Q. Okay. It's true that none of the video of
15 the surveillance led to the identification of
16 Ghislaine Maxwell as coming or leaving the house
17 during the time of surveillance, correct?

18 MS. SCHULTZ: Object to form and
19 foundation.

20 THE WITNESS: I don't know. I didn't see
21 all of the video, so I can't -- I can't attest
22 to that.

23 BY MR. PAGLIUCA:

24 Q. Okay. Did anybody report to you that
25 Ms. Maxwell was seen coming or going?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form, foundation.

3 THE WITNESS: I don't recall.

4 BY MR. PAGLIUCA:

5 Q. If someone had reported to you that
6 Ms. Maxwell was seen coming or going, you would have
7 recorded it in your Palm Beach Police Department
8 incident report, Exhibit No. 1, correct?

9 MS. SCHULTZ: Object to form and
10 foundation.

11 THE WITNESS: I would have told the
12 officer who was conducting the surveillance or
13 reviewing the video to document it in the
14 supplements.

15 BY MR. PAGLIUCA:

16 Q. And there is no documentation in the
17 supplement of Ms. Maxwell either coming or going
18 from Mr. Epstein's house during this time frame,
19 correct?

20 MS. SCHULTZ: Object to the form.

21 THE WITNESS: I don't believe so. I
22 don't -- I don't -- I don't believe so.

23 BY MR. PAGLIUCA:

24 Q. And, again, so we're on the same page,
25 when you say "I don't believe so," I interpret that

1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: Correct.

3 BY MR. PAGLIUCA:

4 Q. And none of these individuals was employed
5 as a massage therapist at the time of their alleged
6 involvement with Mr. Epstein, correct?

7 A. Correct.

8 Q. Each of these individuals, as I recall,
9 claimed to have been paid directly by Mr. Epstein or
10 Ms. Kellen, correct?

11 MS. SCHULTZ: Object to form and
12 foundation.

13 THE WITNESS: Correct.

14 BY MR. PAGLIUCA:

15 Q. Most often, these individuals, these 17
16 individuals, were paid directly by Mr. Epstein,
17 correct?

18 MS. SCHULTZ: Object to form and
19 foundation.

20 THE WITNESS: Mr. Epstein or Sarah Kellen.

21 BY MR. PAGLIUCA:

22 Q. Okay. None of these individuals identify
23 Ms. Maxwell as someone who was paying them money,
24 correct?

25 MS. SCHULTZ: Object to form and

1 JOSEPH RECAREY - CONFIDENTIAL

2 foundation.

3 THE WITNESS: I don't believe so, no.

4 BY MR. PAGLIUCA:

5 Q. And each of these individuals identified
6 receiving cash, correct?

7 MS. SCHULTZ: Object to the form.

8 THE WITNESS: Correct.

9 BY MR. PAGLIUCA:

10 Q. Each of these individuals claimed varying
11 amounts, generally between \$200 and up to \$1,000,
12 correct?

13 MS. SCHULTZ: Object to form.

14 THE WITNESS: Correct.

15 BY MR. PAGLIUCA:

16 Q. According to each of these individuals,
17 Mr. Epstein, when the massage was over, would either
18 hand them the money -- that happened according to
19 these individuals, right?

20 MS. SCHULTZ: Object to form.

21 THE WITNESS: At times, yes.

22 BY MR. PAGLIUCA:

23 Q. Or Mr. Epstein had laid out the money
24 somewhere and directed them to where to go get it,
25 correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. I don't believe clothing was seized.

3 Q. To your knowledge, did you seize any
4 property belonging to Ghislaine Maxwell from the
5 home?

6 MS. SCHULTZ: Object to form and
7 foundation.

8 THE WITNESS: I'm not sure. Not to my
9 knowledge.

10 BY MS. SCHULTZ:

11 Q. Okay. No one ever came to you and said,
12 Could you please return these items to Ms. Maxwell,
13 correct?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: No.

16 BY MS. SCHULTZ:

17 Q. All right.
18 You did that with Janush?

19 A. Yes, he had photos and --

20 Q. But nothing like that ever happened with
21 Ms. Maxwell, correct?

22 MS. SCHULTZ: Object to form.

23 THE WITNESS: No.

24 BY MS. SCHULTZ:

25 Q. Ms. Maxwell was not present when you

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Any way that you get contacted by a police
3 officer, if they put it into your database, it will
4 come up when you do the CAD search, correct?

5 A. Right.

6 Q. And that's all that came up with regard to
7 Ms. Maxwell, was her name was somewhere in the
8 system. Do you know or not know?

9 MS. SCHULTZ: Object to form and
10 foundation.

11 THE WITNESS: I don't know.

12 MR. PAGLIUCA: Okay.

13 (The referred-to document was marked by
14 the court reporter for Identification as
15 Deposition Exhibit 12.)

16 BY MR. PAGLIUCA:

17 Q. I have handed you what has been marked as
18 Deposition Exhibit 12, which I will represent to you
19 are the Plaintiff in this case, Ms. Giuffre's Rule
20 26 disclosure.

21 I want to just go through very quickly and
22 ask you if you know any of these individuals.

23 So, let's start with No. 1, Virginia
24 Giuffre. Have you ever met Virginia Giuffre?

25 A. No.

1 JOSEPH RE CAREY - CONFIDENTIAL

2 Q. Have you ever talked to her?

3 A. I don't recall.

4 Q. Do you know what information that she may
5 have that's referenced below? Conducted is the
6 subject of this action. Do you have any knowledge
7 of that?

8 MS. O'CONNOR: Object to form.

9 THE WITNESS: No.

10 BY MR. PAGLIUCA:

11 Q. Number 2, Ghislaine Maxwell, I'm going to
12 come back to her.

13 Number 3, Juan Alessi, you did interview
14 Mr. Alessi, correct?

15 A. Yes.

16 Q. I have seen a transcript of that
17 interview, and I have seen Exhibit 2, which is a
18 transcript of the interview with Ms. [REDACTED]. I want
19 to ask you a couple of questions about the
20 transcription process.

21 As I understand your testimony previously,
22 the electronic recordings are sent somewhere, you
23 don't know where, for transcription; is that right?

24 MS. SCHULTZ: Object to form.

25 THE WITNESS: I didn't request a

1 JOSEPH RECAREY - CONFIDENTIAL

2 different investigators Mr. Black uses in a
3 particular calendar year, do you?

4 MS. SCHULTZ: Object to form.

5 THE WITNESS: No.

6 BY MR. PAGLIUCA:

7 Q. And so you don't know whether Mr. Black's
8 association with this law firm was in connection
9 with Mr. Epstein's case or some other case, do you?

10 MS. SCHULTZ: Object to form.

11 THE WITNESS: I worked this case,
12 nothing -- nothing but this case for an entire
13 year. This was my only case for a year.

14 BY MR. PAGLIUCA:

15 Q. Okay. That's it?

16 A. If it walks like a duck.

17 MS. SCHULTZ: Objection.

18 BY MR. PAGLIUCA:

19 Q. Okay. So we're finished with Dershowitz.
20 Keep on going.

21 A. Number 28, obviously, [REDACTED].

22 Q. Okay. And you've talked about her?

23 A. Right.

24 Q. And, again, she never discussed Ghislaine
25 Maxwell with you, correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Right. So you're 75. So I want you -- I
3 want to take a moment and read what's under 75:
4 "Detective Recarey was the chief investigator of the
5 crimes committed at Jeffrey Epstein's Palm Beach
6 mansion." Is that true?

7 MS. SCHULTZ: Object to form.

8 THE WITNESS: Yes.

9 BY MR. PAGLIUCA:

10 Q. "And has information about Ghislaine
11 Maxwell and Jeffrey Epstein's sexual trafficking
12 conduct and interaction with underaged minors."

13 Tell me everything that you believe you
14 know about Ghislaine Maxwell's sexual trafficking
15 conduct.

16 MS. SCHULTZ: Object to form.

17 THE WITNESS: I don't.

18 BY MR. PAGLIUCA:

19 Q. So that's inaccurate, then? I mean, you
20 have no knowledge about Ghislaine Maxwell sexually
21 trafficking anybody, do you?

22 MS. SCHULTZ: Object to form.

23 THE WITNESS: Not with -- not with the
24 girls that I spoke with, no.

25

1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. PAGLIUCA:

3 Q. But that's your investigation, right?

4 A. Right.

5 Q. Okay.

6 A. Right.

7 Let's see. Seventy-six.

8 Q. Okay. And you've talked about her.

9 Whatever happened to her, do you know?

10 MS. SCHULTZ: Object to form.

11 BY MR. PAGLIUCA:

12 Q. Haley Robson?

13 A. No.

14 Q. She was never charged, as I understand it,
15 correct?

16 A. Correct.

17 Q. And after you spoke to her in connection
18 with your investigation, did you ever speak to her
19 again?

20 A. No.

21 Q. Okay.

22 A. David Rogers, 77.

23 Q. And you know him because he was identified
24 as one of the pilots for Mr. Epstein, right?

25 A. Right.

1 JOSEPH RECAREY - CONFIDENTIAL

2 in your mind, right? Correct?

3 MS. SCHULTZ: Object to the form.

4 THE WITNESS: Yes.

5 BY MR. PAGLIUCA:

6 Q. And you're a peace officer, obligated to
7 arrest when a felony is committed in your presence,
8 correct?

9 A. Correct.

10 Q. And the possession of child pornography is
11 a felony, correct?

12 A. Correct.

13 Q. And had you seen any child pornography in
14 Mr. Epstein's house when you were there installing
15 these cameras, you would have done something about
16 it, correct?

17 MS. SCHULTZ: Object for form.

18 THE WITNESS: Right.

19 BY MR. PAGLIUCA:

20 Q. You wouldn't have just walked out and
21 said, Nice pics, have a nice day, correct?

22 A. Correct.

23 Q. So is it fair to say the entire time you
24 were in Epstein's house, whether it's 2002, 2003,
25 you did not observe any child pornography, right?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to the form.

3 THE WITNESS: Not in the areas I was in.

4 BY MR. PAGLIUCA:

5 Q. You don't recall seeing any pictures of
6 naked women, do you?

7 MS. SCHULTZ: Object to form.

8 THE WITNESS: Again, I was only confined
9 to where that desk was. That's where I set up
10 the camera, and then after it was set up, I
11 left.

12 BY MR. PAGLIUCA:

13 Q. Okay. But, again, all I'm asking you is
14 wherever you were, you didn't see any pictures of
15 naked women?

16 A. Right. No, I didn't see any.

17 Q. And at the time you recall that he had
18 these surveillance cameras already installed; is
19 that true? Other cameras, the clock cameras?

20 MS. SCHULTZ: Object to form.

21 THE WITNESS: I'm not sure if he had the
22 cameras installed or not. I can't recall.

23 BY MR. PAGLIUCA:

24 Q. Why would he need your cameras if he
25 already had cameras?

1 JOSEPH RECAREY - CONFIDENTIAL

2 None of these alleged victims claimed to
3 have ever traveled with Mr. Epstein, correct?

4 MS. SCHULTZ: Object to form.

5 THE WITNESS: No.

6 BY MR. PAGLIUCA:

7 Q. No, they did not? They did not travel
8 with Mr. Epstein, right?

9 MS. SCHULTZ: Object to form.

10 THE WITNESS: I don't believe so, no.

11 BY MR. PAGLIUCA:

12 Q. None of them reported that to you?

13 A. Not reported, correct.

14 Q. None of them reported to you that they
15 ever spent the night with Mr. Epstein, did they?

16 MS. SCHULTZ: Object to form.

17 THE WITNESS: I don't believe so.

18 BY MR. PAGLIUCA:

19 Q. None of them ever reported being
20 trafficked by Mr. Epstein to other men, correct?

21 MS. SCHULTZ: Object to form, foundation.

22 THE WITNESS: I don't believe so.

23 BY MR. PAGLIUCA:

24 Q. The only other men that any of these
25 alleged victims -- the only man that any of these

1 JOSEPH RECAREY - CONFIDENTIAL

2 alleged victims ever claimed to have any contact
3 with that was sexual in nature was Mr. Epstein,
4 correct?

5 MS. SCHULTZ: Object to form and
6 foundation.

7 THE WITNESS: Yes.

8 BY MR. PAGLIUCA:

9 Q. Okay. None of these alleged victims ever
10 claimed to have been sent to another location to
11 have sex with another man, correct?

12 MS. SCHULTZ: Object to form and
13 foundation.

14 THE WITNESS: I don't believe so.

15 BY MR. PAGLIUCA:

16 Q. Meaning my statement is correct; is that
17 right?

18 MS. SCHULTZ: Object to form.

19 BY MR. PAGLIUCA:

20 Q. I'm just trying to --

21 A. Meaning I don't believe they've ever said
22 that. I don't recall any of them ever saying...

23 Q. Had they claimed that they were sent
24 somewhere else to have sex with another man, you
25 would have followed up on that, correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form.

3 THE WITNESS: Correct.

4 BY MR. PAGLIUCA:

5 Q. And none of them ever claimed to have been
6 sent to another location to give another man a
7 massage, correct?

8 MS. SCHULTZ: Object to form.

9 THE WITNESS: No, not the victims.

10 BY MR. PAGLIUCA:

11 Q. Right. That's who I'm talking about.

12 A. I believe [REDACTED] did.

13 Q. Who is an adult, right?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: Right.

16 BY MR. PAGLIUCA:

17 Q. We covered this, I believe: None of them
18 ever was on Mr. Epstein's airplane, correct?

19 MS. SCHULTZ: Object to form.

20 THE WITNESS: I believe one of the victims
21 were, but not to a private island. I think
22 they went -- they didn't go to a private
23 island; they went to some other trip.

24 BY MR. PAGLIUCA:

25 Q. I think maybe you're referring to AH, who

1 JOSEPH RECAREY - CONFIDENTIAL

2 went to New York but on a commercial flight. Does
3 that jog your memory?

4 MS. SCHULTZ: Object to form.

5 THE WITNESS: No.

6 BY MR. PAGLIUCA:

7 Q. Okay. Do you recall who it is?

8 A. It would have been FP.

9 Q. Okay. Was on Mr. Epstein's airplane?

10 MS. SCHULTZ: Object to form.

11 THE WITNESS: I believe so.

12 BY MR. PAGLIUCA:

13 Q. Would that be reflected in Exhibit 1?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: But she flew alone. It
16 wasn't like Epstein was there. She went
17 someplace else, not to his private island,
18 nothing to do with Epstein. It was something
19 she wanted to do. And I think she flew on his
20 plane, but it was, like, her by herself.

21 BY MR. PAGLIUCA:

22 Q. Alone.

23 A. Right.

24 Q. With a pilot?

25 A. Right.

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form.

3 BY MR. PAGLIUCA:

4 Q. None of the alleged victims in your
5 investigation claimed to have gone to the Caribbean
6 island of Little St. James, correct?

7 MS. SCHULTZ: Object to form.

8 THE WITNESS: No.

9 BY MR. PAGLIUCA:

10 Q. "No" meaning they never went there,
11 correct?

12 MS. SCHULTZ: Object to form.

13 THE WITNESS: Not that I'm aware of.

14 BY MR. PAGLIUCA:

15 Q. None of the alleged victims ever went to
16 Mr. Epstein's New York residence, to your knowledge,
17 correct?

18 MS. SCHULTZ: Object to form.

19 THE WITNESS: Not that I'm aware of.

20 BY MR. PAGLIUCA:

21 Q. None of them ever reported that to you?

22 MS. SCHULTZ: Object to form.

23 THE WITNESS: No.

24 BY MR. PAGLIUCA:

25 Q. Okay. And none of them ever claimed to

1 JOSEPH RECAREY - CONFIDENTIAL

2 have been outside of the country with Mr. Epstein,
3 ever, correct?

4 MS. SCHULTZ: Object to the form.

5 THE WITNESS: Not that I'm aware of.

6 MR. PAGLIUCA: Can we go off for a second?

7 Time check.

8 THE VIDEOGRAPHER: Off the record at 4:13.

9 (Thereupon, a recess was taken, after
10 which the following proceedings were held:)

11 THE VIDEOGRAPHER: On the record at 4:14.

12 BY MR. PAGLIUCA:

13 Q. Can you take a look at Exhibit 4, please?

14 A. Which one is 4?

15 Q. Four is the True Copy. That's what it
16 says at the top. Exhibit 4. Six pages.

17 A. Yes.

18 Q. Do you have that?

19 A. Yes, sir.

20 Q. There's yellow highlighting on the exhibit
21 that's in front of you.

22 Do you know how that got there?

23 A. No.

24 Q. And there's a -- there are numbers, item
25 numbers. Do you see that in the left column?

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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

I, the undersigned authority, certify
that JOSEPH RE CAREY personally appeared before me
and was duly sworn.

WITNESS my hand and official seal this
24th day of June, 2016.

KELLI ANN WILLIS, RPR, CRR
Notary Public, State of Florida
My Commission No. EE911443
Expires: 2/16/16

+ +

2

3

C E R T I F I C A T E

4

STATE OF FLORIDA)

: ss

5

COUNTY OF MIAMI-DADE)

6

I, KELLI ANN WILLIS, a Registered

7

Professional, Certified Realtime Reporter and

8

Notary Public within and for The State of

9

Florida, do hereby certify:

10

That JOSEPH RECAREY, the witness whose

11

deposition is hereinbefore set forth was duly

12

sworn by me and that such Deposition is a true

13

record of the testimony given by the witness.

14

I further certify that I am not related

15

to any of the parties to this action by blood

16

or marriage, and that I am in no way interested

17

in the outcome of this matter.

18

IN WITNESS WHEREOF, I have hereunto set

19

my hand this 24th day of June, 2016.

20

21

KELLI ANN WILLIS, RPR, CRR

22

23

24

25

EXHIBIT HH

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

CASE NO.: CACE 15-000072

EDWARDS, *et al.*,

Plaintiffs / Counterclaim Defendants,

v.

DERSHOWITZ,

Defendant / Counterclaim Plaintiff.

**AFFIDAVIT OF JUAN P. ALESSI
REGARDING KNOWLEDGE OF ALAN M. DERSHOWITZ**

A. Introduction

1. My name is Juan P. Alessi. I make this declaration voluntarily and without compensation on personal knowledge concerning Alan Dershowitz and his visits at my former employer Jeffrey Epstein's home in Palm Beach, Florida.
2. I worked for Mr. Epstein from January 1991 to December 2002 as a full-time employee performing maintenance services and then also became the manager for the home on 358 El Brillo Way in Palm Beach, Florida.
3. Since Mr. Epstein was investigated and arrested, I have spoken with police, investigators, and attorneys concerning my time working for Mr. Epstein.
4. On September 8, 2009, I gave a deposition in the case captioned *Jane Doe No. 2 v. Jeffrey Epstein*, Case No. 08-CV-80119 in which I truthfully answered the questions posed by the attorneys. I also gave a sworn statement on November 21, 2005 to

Detective Joseph Recarey of the Palm Beach P.D. during their investigation of Mr. Epstein.

5. I have reviewed the statements that Bradley Edwards and Paul Cassell attribute to me in their papers in the cases against the Government and against Mr. Dershowitz. Because I do not believe they accurately reflect the statements I previously made, I submit this affidavit to have my statements accurately reflected and made clear on the record.

B. Summary of My Knowledge of Massages at Mr. Epstein's Palm Beach Home

6. As I stated in my deposition, a massage was like a treat for all the guests at Mr. Epstein's home. Mr. Epstein usually received his massages in his private suite, but guests would also be given massages in their respective rooms or by the pool area.
7. There were between fifty (50) to one hundred (100) masseuses – mostly women but also some men - who would come to give massages during this time. I provided names of masseuses in my deposition.
8. As I stated in my deposition, I was unaware of any masseuses being under the age of 18. I believed that the females' age ranged from overage to maybe mid-forties. As I stated in my deposition, I received as a gift a massage from a male masseuse at Mr. Epstein's home in Palm Beach.
9. In my deposition, I was asked about cleaning up after massages. I stated that when I cleaned Mr. Epstein's bedroom suite, which included the bathroom of Ms. Maxwell, after massages, I would, on occasion, find vibrators and sex toys. I have specific recollection of finding these items in the sink of Ms. Maxwell's bathroom. I did not state or imply that vibrators or sex toys were found after massages in other rooms used by guests because that was not the case. Guests having massages did not have

massages in Mr. Epstein's private bedroom suite. This area was private and off-limits to guests, which I explained to the lawyers during my deposition. As I said in my deposition, massage tables were located in almost every room, including guest rooms and by the pool. I never found, and never heard anyone in the house finding, a vibrator or a sex toy in the same room where any guest, including Alan Dershowitz, had a massage.

10. The following statement made by Virginia Roberts's attorneys in a filing on January 21, 2015 is not accurate and is a misrepresentation of what I said in my deposition:

"The private, upstairs room where Dershowitz got his 'massages' was one that contained a lot of vibrators – Maxwell had 'a laundry basket . . . full of those toys' in that room."

C. Summary of My Interaction with Alan M. Dershowitz

11. During the approximate thirteen years I worked for Mr. Epstein, I believe I saw Mr. Dershowitz visit Mr. Epstein's Palm Beach home approximately four or five times a year. I recall driving him to the airport on multiple occasions.
12. At the time, I understood that Mr. Dershowitz was a famous lawyer. His visits to the house would typically involve a group of intellectuals or business men in social, but professional type gatherings.
13. I can recall that Mr. Dershowitz had a massage on at least one occasion during a visit to Mr. Epstein's home in Palm Beach (although I cannot recall that Mr. Dershowitz received a massage on more than one occasion). I do not recall Mr. Dershowitz being massaged by anyone who I thought was less than 18 years old. I have no reason to doubt Mr. Dershowitz's statement that this massage was done by a woman named Olga who was in her forties. In fact, I do remember a masseuse named Olga that

lived in Palm Beach, though I do not know her last name. As I have said, I never saw Mr. Dershowitz around young girls. I have also explained that there were masseuses, both male and female, that were in their mid-forties.

14. I never saw Mr. Dershowitz do anything improper or be present while anyone else was being improper.
15. Before asking me about Jeffrey Epstein speaking to celebrities at the house, the attorney for "Jane Doe 102" asked me about Jean Luc Brunel, Mark Epstein, Daniel Estes, Matt Groening, and Leslie Wexner. I then listed Senator Mitchell, Prince Andrew, Princess Sarah Ferguson, Miss Yugoslavia, Miss Germany, Alan Dershowitz, Princess Diana's secretary with her children, Mr. Trump, Mr. Robert Kennedy, Jr., Frederik Fekkai, and a couple Noble prize winners as celebrities that I had seen while working for Mr. Epstein. I also mentioned a reunion of Nobel prize winners that was held at the house, and that I met President Clinton at Mr. Epstein's plane the last month that I was working for Mr. Epstein.

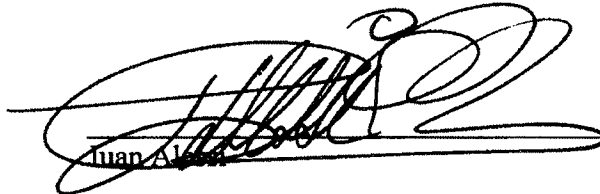
C. Summary of My Interaction with Virginia Roberts

16. The first time I saw Virginia Roberts was at Mar-a-Lago where I believed she worked in the spa. I only recall seeing Virginia Roberts come to Mr. Epstein's house during the last year that I worked for Mr. Epstein. During this time, I believe she visited Mr. Epstein's home in Palm Beach two or three times a week.
17. I never saw any photographs of Virginia Roberts in Mr. Epstein's house. I was shown a photo of Virginia Roberts during my deposition, and I recognized the woman in the photo as Virginia Roberts.
18. As I stated in my deposition, I am not sure whether Virginia Roberts came to the house when Prince Andrew was there.

19. I was never asked by any attorneys if Virginia Roberts came to the house when Mr. Dershowitz was there. If I had been asked, I would have answered that I never saw Virginia Roberts at the house when Mr. Dershowitz was there.
20. The following statement made by Virginia Roberts's attorneys and their own attorney in a filing on December 4, 2015 is not accurate and is a misrepresentation of what I said in my deposition: "Alessi was able to identify a photograph of Ms. Giuffre as someone who was at the mansion at the same time as Dershowitz."
21. As far as I can recall, since I gave my deposition in 2009, I have never been asked by Brad Edwards or Paul Cassell about my knowledge regarding Virginia Roberts or Alan Dershowitz or about my 2009 deposition testimony.

I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this affidavit and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

Dated: January 13, 2016



Juan Alessi

STATE OF FLORIDA
COUNTY OF PALE BEACH

Sworn to or affirmed and signed before me on JANUARY 13, 2016
by JUAN PATRICIO, who provided his driver's license. ALESSI

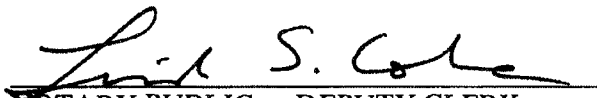

NOTARY PUBLIC or DEPUTY CLERK
LINDA S. COHEN
[Print, type, or stamp commissioned name of notary or clerk.]



EXHIBIT II

1 IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
2 IN AND FOR BROWARD COUNTY, FLORIDA
3 CASE NO. 15-000072

4 BRADLEY J. EDWARDS and PAUL G.
5 CASSELL,

6 Plaintiffs,

7 - vs -

CONFIDENTIAL

8 ALAN M. DERSHOWITZ,

9 Defendant.

-----/

10 VIDEOTAPED DEPOSITION OF VIRGINIA ROBERTS GIUFFRE

11

12 Saturday, January 16, 2016
13 9:07 a.m. - 2:48 p.m.

14 401 East Las Olas Blvd., Suite 1200
15 Fort Lauderdale, Florida 33301

16

17

18 Reported By:

19 Deborah A. Harris, Court Reporter
20 Notary Public, State of Florida
21 Phone - 305.651.0706

22

Job No. J0277789

23

24

25

CONFIDENTIAL

**GIUFFRE005093
CONFIDENTIAL**

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GIUFFRE005094
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1 ALSO PRESENT

2 Edward J. Pozzuoli, Special Master
 3 Robert Pacheco, Videographer
 4 Ryan Kick, Videographer
 5 Bradley J. Edwards
 6 Paul G. Cassell
 7 Alan M. Dershowitz
 8 Brittany N. Henderson, Esq.
 9 Meridith Schultz, Esquire

10 - - -
 11 I N D E X

12 WITNESS DIRECT CROSS REDIRECT RECROSS

13 Virginia Roberts Giuffre

14 By Ms. Borja 5

15 By Mr. Scarola 201

16 By Ms. Borja 204

17 - - -
 18 E X H I B I T S

19 DEFENDANT VR EXHIBITS

FOR ID

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30 REPORTER'S NOTE: Exhibit 5 marked confidential, sealed,
 31 and retained by the Special Master.

32 CONFIDENTIAL

GIUFFRE005095
 CONFIDENTIAL

1 MR. SCAROLA: It is a minor discrepancy,
2 but I think you read it as when she was a minor
3 and it's while she was a minor.

4 BY MS. BORJA:

5 Q. While she was a minor. Do you see where
6 I'm reading starting in the third line?

7 A. Yes.

8 Q. Is that allegation true?

9 A. Yes.

10 Q. If you go to page 6 of the document, do you
11 see the paragraph that's starts, Epstein also trafficked?

12 A. Yes.

13 Q. Is says Epstein also trafficked Jane Doe #3
14 for sexual purposes to many other powerful men including
15 numerous prominent American politicians, powerful
16 business executives, foreign presidents, a well-known
17 prime minister and other world leaders. Do you see that?

18 A. Yes.

19 Q. Is that allegation true?

20 A. Yes.

21 Q. The reference there to foreign presidents,
22 do you see that?

23 A. Yes.

24 Q. You were sexually trafficked to foreign
25 presidents?

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GIUFFRE005102
CONFIDENTIAL

1 A. No.

2 Q. So that's not true, you were not sexually
3 trafficked to foreign presidents?

4 A. I don't know what foreign president you're
5 talking about.

6 Q. Have you ever been sexually trafficked to
7 any foreign president?

8 MS. MCCAWLEY: I'm going to allow you to
9 ask that question, but with respect to specific
10 identification of an individual we're not going to
11 do that. At this point she has.

12 MS. BORJA: Counsel, your objection has
13 been made. No speaking objections, please. Let's
14 move on.

15 MS. MCCAWLEY: I can make my record, and my
16 record is she's not going to be speaking with
17 respect to individuals' names that are named in
18 generalities in this document.

19 SPECIAL MASTER: Objection overruled. You
20 can answer.

21 A. I understand well-known prime ministers and
22 other world leaders; as far as foreign presidents, I'm
23 not too sure, I don't know.

24 Q. Have you ever met any foreign presidents?

25 A. Foreign presidents as in overseas?

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1 Q. Sure, okay, overseas.

2 A. No.

3 Q. Have you ever met any foreign presidents
4 from countries not overseas such as Canada or Mexico?

5 A. No.

6 Q. So you were not sexually trafficked to any
7 foreign presidents; is that correct?

8 A. As far as I know right now, yes.

9 Q. It's correct that you were not sexually
10 trafficked to them, right?

11 A. You've asked me this three times and I'm
12 telling you.

13 Q. Okay. A well-known prime minister. Were
14 you sexually trafficked to a well-known prime minister?

15 A. Yes.

16 Q. Who was that?

17 MS. MCCAWLEY: I'm going to object to this
18 line of questioning. This has to do with safety
19 concerns for her.

20 MS. BORJA: Counsel, this is under seal.
21 You can answer.

22 MS. MCCAWLEY: No, she's not going to
23 answer.

24 SPECIAL MASTER: Hang on one second.

25 MS. MCCAWLEY: Let me make my objection.

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1 SPECIAL MASTER: Okay. I can't twist her
2 arm and force her so we'll deal with it.

3 BY MS. BORJA:

4 Q. Okay. Other world leaders, what other
5 world leaders were you sexually trafficked to?

6 MS. MCCAWLEY: We have the same objection.

7 SPECIAL MASTER: And I would have the same
8 ruling based upon the arguments.

9 MS. MCCAWLEY: Let me just make my record.
10 To the extent that there's a name of an individual
11 that you can reveal that you do not feel would
12 harm your physical safety, you're welcome to
13 reveal them. Anybody else, you don't have to
14 reveal at this time and we'll take that to Judge
15 Lynch.

16 A. Okay. Prince Andrew for one.

17 Q. Other than Prince Andrew?

18 A. There is another individual that I honestly
19 do not know his name.

20 Q. What country is he from?

21 A. I'm not too sure, he spoke in a foreign --
22 he did speak foreign tongue, he spoke English as well,
23 but I'm not too sure where he was from.

24 Q. How do you know he is world leader?

25 A. I was introduced to him as a prince.

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1 Q. Okay. Did he have security with him?

2 A. I'm sure he did somewhere around, but not
3 when I was with him.

4 Q. Did you see security?

5 A. No.

6 Q. Did you -- where were you when you met him?

7 A. On this occasion the South of France.

8 Q. Are there witnesses to you being sexually
9 trafficked to this prince?

10 A. Yes.

11 Q. Name them.

12 A. Jeffrey Epstein, Ghislaine Maxwell.

13 Q. Anyone else?

14 A. There was a whole bunch of people in the
15 room so of course.

16 Q. Was this an orgy?

17 A. No.

18 Q. Who else was in the room?

19 A. I can't name them all, there was a lot.

20 Q. Name as many as you can name?

21 A. I don't know their names. I can't name
22 their names.

23 Q. They were present during sexual activity?

24 A. They were present before the sexual
25 activity and then I went to have sexual activity with him

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1 alone.

2 Q. So he's the only witness to your sexual
3 activity, the prince?

4 A. On the instruction of Epstein and
5 Ghislaine, yes.

6 Q. Where in the South of France were you?

7 A. I don't know.

8 Q. Were you on a boat, were you in a house?

9 A. We were at a like a cabana, not cabana,
10 like a resort, but it was a big party.

11 Q. Who was throwing the party?

12 A. I don't know. I was just brought there.

13 Q. You also refer to powerful business
14 executives. What powerful business executives were you
15 sexually trafficked to?

16 MS. MCCAWLEY: Again, to the extent you can
17 reveal somebody without a safety concern you're
18 welcome to do that.

19 SPECIAL MASTER: Well, again --

20 MS. MCCAWLEY: Right. I understand.

21 SPECIAL MASTER: Same objection, same
22 ruling.

23 A. George Mitchell.

24 Q. When were you sexually trafficked to George
25 Mitchell?

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1 Q. Do you have the originals?

2 A. Again, between the FBI and giving them to
3 my lawyers and Sharon Churcher, the circulation, I'm not
4 too sure if I have the originals. I know I have copies.
5 So I'm not too sure if they're the originals.

6 Q. The booklet that you gave pages from to Ms.
7 Churcher where is that booklet?

8 A. Burned.

9 Q. When did you burn it?

10 A. In, I think it was 2013. Me and my husband
11 had a bonfire.

12 Q. What did you put in the bonfire?

13 A. Any kind of memories that I had written
14 down about all the stuff going on.

15 Q. Had you written anything about Professor
16 Dershowitz?

17 A. He could have been there, yes.

18 Q. And you burned that?

19 A. I wanted to burn my memories. I wanted to
20 get rid of it. It was very painful stuff.

21 Q. Other than what you had written down did
22 you burn anything else? I don't mean the wood, when you
23 talk about burning your memories, what were you burning?

24 A. I was burning like memories, thoughts,
25 dreams that I had, just everything that was kind of

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1 affiliated with the abuse I endured, and there was a lot
2 of it in there. My husband is pretty spiritual so he
3 said the best thing to do would be burn them.

4 Q. Is there anything you decided to keep and
5 not burn?

6 A. Just the photographs.

7 Q. Anything else that you can think of?

8 A. Photographs, that's it.

9 Q. Approximately when in 2013 was this
10 bonfire?

11 A. I don't know what month it was.

12 Q. Did you do it outside?

13 A. Yeah, it was outside. I wasn't going to do
14 it in my living room.

15 Q. Did it feel good to be close to the fire
16 because it was cold out or was it a summertime bonfire?

17 A. I believe I had just bought my house in
18 Titusville, Florida. I bought my house in, I think, I
19 either got it October or November of 2013. It would have
20 been around probably November.

21 Q. Why did you decide to keep the photos?

22 A. They're evidence.

23 Q. Do you have any photographs of yourselves
24 with Professor Dershowitz?

25 A. No.

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1 Beach, I've seen him in New York. So I mean, if we're
2 going to pin point how many times I've seen him or the
3 next time I saw him after that I don't know.

4 Q. Then tell me -- let's do it this way, what
5 was the most recent time that you recall having sex with
6 Professor Dershowitz?

7 MS. MCCAWLEY: Objection.

8 SPECIAL MASTER: You can answer.

9 A. The first time I recall having sex with
10 Professor Dershowitz was in New York.

11 Q. My question was, the most recent time now.
12 What's the most current, most recent memory of having sex
13 with Professor Dershowitz?

14 MS. MCCAWLEY: Objection. Just so I'm
15 clear, you're going backward?

16 MS. BORJA: Correct.

17 MS. MCCAWLEY: The last time.

18 A. The last time that I remember having sex
19 with him? Okay. I believe it was on an airplane.

20 Q. Where were you going?

21 A. On, I believe it was Massachusetts. I
22 don't know. It's very hard for me to remember exactly
23 where we were going, what were the circumstances.

24 Q. So that's the time you testified about
25 earlier?

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1 age of 30?

2 Q. That were providing massages to Jeffrey
3 Epstein?

4 A. Just the male that was teaching me on the
5 USVI and Sheridan, but she was also involved in sexual
6 acts. She wasn't over the age of -- she could have been
7 around 30, but she would have been over 30.

8 Q. Did you keep a list of the masseuses who
9 came to Epstein's properties?

10 A. No.

11 Q. Did some of them come only once?

12 A. Uh-huh.

13 Q. Are there some that came when you weren't
14 there?

15 A. I wasn't there, how am I to know.

16 Q. You don't know if any came as a masseuse
17 while you were not at Jeffrey Epstein's property?

18 MS. MCCAWLEY: Objection, asked and
19 answered.

20 A. I wasn't there so I couldn't have.

21 Q. What's the sixth incident that you say
22 happened where you were sexually trafficked to Professor
23 Dershowitz?

24 A. We've talked about New York, we talked
25 about Palm Beach, New Mexico, U.S. Virgin Islands, talked

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1 about we took the airplane?

2 Q. Yes.

3 A. There was an instance in a car, but it was
4 more -- it wasn't intercourse, it was more --

5 MS. MCCAWLEY: Use a term you're
6 comfortable with.

7 A. More oral is the good term to use, oral
8 sex.

9 Q. Where were you? Where was his car, what
10 city, what state, what jurisdiction? Where were you?

11 A. This was in Massachusetts. It was a black
12 limousine.

13 Q. Who else was in the car other than yourself
14 and Professor Dershowitz?

15 A. Jeffrey Epstein and another young girl.

16 Q. How many people participated in the sexual
17 activity in the car?

18 A. Including myself?

19 Q. Uh-huh.

20 A. Four.

21 Q. Where was everybody in the car?

22 A. Sitting down.

23 Q. Were people -- was this a town car, was
24 this a limousine?

25 A. Like a long limousine.

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1 Q. Where was the car going?

2 A. To Mr. Dershowitz' house.

3 Q. Where was it coming from?

4 A. An airport.

5 Q. When was this?

6 A. I don't know.

7 Q. What's your best recollection?

8 A. It wasn't snowing. It wasn't hot. So I
9 would like to say -- I'm trying to think of the trees
10 around, but I don't know, maybe spring.

11 Q. Why were you going to Professor Dershowitz'
12 house?

13 A. Jeffrey and him were doing some business.
14 They were doing something at his house. Nothing sexual
15 happened at his house.

16 Q. Did you go in Professor Dershowitz' house?

17 A. Yes, I did.

18 Q. How long were you there?

19 A. Not even twenty minutes, half an hour.

20 Q. What did you do while you were in the
21 house?

22 A. I sat in, I don't know, a foyer with
23 another girl and Jeffrey and Dershowitz went to a
24 different part of the house. There was a desk there and
25 we just sat, not sat, stood in the foyer.

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1 Q. Who was this other girl?

2 A. I don't know who she is.

3 Q. Had you ever met her before?

4 A. No.

5 Q. When you were coming from the airport had
6 you flown in?

7 A. Yes, me and Jeffrey and the girl had flown
8 in, Dershowitz had not.

9 Q. How did he get into the limousine?

10 MS. MCCAWLEY: Objection.

11 SPECIAL MASTER: You can answer.

12 BY MS. BORJA:

13 Q. Where did he get into the limousine?

14 A. At the airport.

15 Q. He was not on a flight with Mr. Epstein?

16 A. Not on this occasion.

17 Q. Did you tell anybody about this incident in
18 the car?

19 A. Like anybody that I know personally?

20 Q. Anybody in the world?

21 MS. MCCAWLEY: Objection to the extent you
22 relayed something to your lawyer. You can say
23 that you told your lawyers but you can't discuss
24 what you said.

25 SPECIAL MASTER: Other than --

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1 A. No, I told my lawyers.

2 Q. Did you tell anybody about it closer in
3 time to the event?

4 A. Like my boyfriend or something like that,
5 no.

6 Q. After you left Professor Dershowitz's house
7 where did you go?

8 A. Back to the airport.

9 Q. Where did you fly in from?

10 A. I believe it was New York.

11 Q. When you went back to the airport where did
12 you go?

13 A. I believe, see, that's the hard thing. I
14 want to say either New York or Palm Beach. I'm no 100
15 percent sure.

16 Q. So I understand the time frame, did you fly
17 in on a private jet or commercial?

18 A. Private.

19 Q. You flew out again on private?

20 A. Yes.

21 Q. So the time frame is that you and Jeffrey
22 were on the plane?

23 MS. MCCAWLEY: Objection.

24 A. Yes.

25 MS. MCCAWLEY: Objection, mischaracterizes

1 the testimony. Go ahead.

2 A. Yes, me and Jeffrey were on the plane
3 together.

4 Q. And the girl was on the plane?

5 A. Yes.

6 Q. Anybody else?

7 A. The pilots.

8 Q. So the three of you took the flight,
9 correct?

10 A. Yes.

11 Q. And you flew into an airport in
12 Massachusetts?

13 A. Yes.

14 Q. Then you took a limousine to the
15 Professor's house and you were there for about ten
16 minutes, is that right?

17 MS. MCCAWLEY: Objection. Go ahead.

18 A. About 20, 25 minutes. I didn't look at my
19 watch.

20 Q. A very brief period of time?

21 A. Very brief.

22 Q. And then you went back to the airport and
23 you flew out?

24 A. Yes.

25 Q. And you flew back either to New York or to

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1 A. Besides what's in these?

2 Q. Did you ever look to see if you had any
3 personal notes in your writing that pertain to Professor
4 Dershowitz?

5 A. Like from my old journal, the one that I
6 burned?

7 Q. From anywhere. Did you ever make an effort
8 to look?

9 A. Dershowitz could have been in my journal,
10 he could have been. We're talking about an 85 page, if
11 not more, you know, things that I had written to get my
12 story out of my head and into pages; and yes, Dershowitz
13 could have been in there, but that's up in the clouds
14 now, bonfire.

15 Q. That's what you call your journals, what
16 you burned, right?

17 A. Yes.

18 Q. And you wrote that journal in order to
19 collect your thoughts?

20 A. To get everything out of here and on to
21 paper.

22 Q. Have you made any other notes, though,
23 since then to help you when you think of things?

24 A. Yes, sometimes like I said, sometimes when
25 I read my affidavits and stuff like that, you know, and I

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1 think of something else like a description of something
2 that I forget about, you know what I mean, then yeah,
3 I'll go back and I'll write it in the journal, you know,
4 for instance, you know, what another girl would have
5 looked like. Even though I can't identify her name or
6 her age or anything like that, but I do remember like
7 flashes of blonde, little things like that, but nothing
8 -- I don't have any more journals.

9 Q. But those notes, they help your memory?

10 A. Sometimes. I'm a very visual person.

11 Q. And they help you with your affidavits?

12 A. No, they don't help me with my affidavits,
13 my affidavits are already done, I just go back and it
14 helps my memory. It helps me bring stuff out.

15 Q. What do you do with those notes?

16 A. Nothing, literally nothing. They're in a
17 notebook that if I need to write it down. I have a dream
18 notebook as well where I'll just write down my dreams and
19 stuff. I do nothing, no one is seeing it.

20 Q. You read it? You keep it?

21 A. Yeah, I keep it.

22 Q. Okay. Have you gone back and read that
23 recently?

24 A. No.

25 Q. Okay. You continue to make entries into

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1 it?

2 A. Not so much about Dershowitz. It's mostly
3 like feelings, dreams, you know, past things that I've
4 gone through. Like I said, not so much pertaining to
5 Dershowitz himself.

6 Q. And that's separate from your dream book?

7 A. No, it's all in one.

8 Q. Is it a spiral bound notebook?

9 A. Yes, it's just a cheap, like, actually it's
10 in my kid's closet.

11 Q. At this point in time are you angry with
12 Mr. Epstein?

13 A. Furious.

14 Q. Are you angry with Professor Dershowitz?

15 A. Absolutely.

16 Q. Are you angry with famous politicians?

17 A. I'm angry with anybody who has it in their
18 mind that they can hurt and abuse a minor child and
19 continue to lie about getting away with it and that what
20 they've done is okay and they can continue to harass
21 victims, yes, I'm furious.

22 Q. Are you angry with Professor Dershowitz for
23 his role in representing Jeffrey Epstein in the criminal
24 action?

25 A. Do I think he played a big part getting him

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C E R T I F I C A T E O F O A T H

STATE OF FLORIDA,
COUNTY OF DADE,

I, Deborah A. Harris, the undersigned
authority and Notary Public certify that VIRGINIA ROBERTS
GIUFFRE personally appeared before me and was duly sworn
on the 16th day of January, 2016.

Sworn to before me this 20th day of
January, 2016.

Deborah A. Harris, Court Reporter
Notary Public - State of Florida
My Commission No. FF 246867
My Commission Expires: October 31, 2019
Job No. J0277789

1 REPORTER'S CERTIFICATE

2
3 I, Deborah A. Harris, Florida Professional
4 Court Reporter and Notary Public in and for the State of
5 Florida at Large, do hereby certify that I was authorized
6 to and did report said deposition in stenotype; and that
7 the foregoing pages 1 through 216 are a true and correct
8 transcription of my shorthand notes of said deposition.

9 I further certify that said deposition was
10 taken at the time and place hereinabove set forth and
11 that the taking of said deposition was commenced and
12 completed as hereinabove set out.

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