EXHIBIT 22
(Filed Under Seal)
**Per Local Rule 26.2, the following privileges are asserted pursuant to British law, Colorado law and NY law.**

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EXHIBIT 23
(Filed Under Seal)
Expert Report of Professor Terry Coonan, J.D.
Pursuant to Federal Rule of Civil Procedure 26(a)(2)(B)

Giuffre v. Maxwell
Case No. 15-cv-07433-RWS
international commercial dimensions of the sex trafficking scheme recounted by Ms. Giuffre. It is both factually and legally correct to characterize what Ms. Giuffre experienced as victimization in a sex trafficking conspiracy.

Conclusion 4

Virginia Roberts Giuffre’s account appears credible and consistent in its most salient parts with the testimony of other witnesses and with contemporary trends in U.S. sex trafficking.

The description of exploitation recounted by Ms. Giuffre, while not the most common sex trafficking scenario (many cases involve even more brutal forms of pimp-driven prostitution) nonetheless is quite consistent with larger patterns of commercial sexual exploitation. The conspiracy in this case was premised upon the exploitation of minors and young women who seem to have had certain identifiable vulnerabilities that rendered them prone to exploitation. The criminal scheme that emerges from the depositions and police reports involved a very calculated pattern of recruiting, grooming, and an attempt to “normalize” the repeated exploitation of its victims.

While the accounts of witnesses vary in some of their details, the essential elements of a sex trafficking conspiracy clearly emerge when viewed in the totality of the circumstances that are recounted in the case record. Ms. Giuffre refers to herself at times as a “sex slave.” This is not factually incorrect, given her experiences, though current U.S. law might prefer to characterize her as a victim of sex trafficking. Popular understandings of the term “sex slave” might still connote images of violent pimps, white slavery, or of victims chained to a bed in a brothel in the minds of some people. To call Ms. Giuffre a victim of sex trafficking would however very accurately convey the reality that she along with a great many other victims of contemporary forms of slavery are often exploited by the “invisible chains” of fraud and psychological coercion.
EXHIBIT 24
(Filed Under Seal)
Expert Witness Report of

Dr. Bernard J. Jansen
Professor
College of Information Sciences and Technology
The Pennsylvania State University

Regarding the case of:

Virginia Giuffre
v.
Ghislaine Maxwell

(U.S. District Court for the Southern District of New York)

9 September 2016
I. INTRODUCTION

1. I have been retained by the law firm of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. to provide expert analysis and opinion on behalf of Ms. Virginia Giuffre in VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. CASE NO. 1:15-cv-07433, which is pending in the United States District Court Southern District of New York.

II. QUALIFICATIONS

2. I am a tenured, full professor at the College of Information Sciences and Technology at The Pennsylvania State University, University Park, Pennsylvania, where I have been employed since 2001. I am the Director of the Information Searching and Learning Laboratory at the College of Information Sciences and Technology at The Pennsylvania State University. I am also a principal scientist at the Qatar Computing Research Institute. I was a Senior Fellow at the Pew Internet & American Life Project, which is part of the Pew Research Center, from 2010 through 2012. I was also a University Expert at the National Ground Intelligence Center from 2011 through 2014. Prior to my employment at The Pennsylvania State University, I was a Lecturer in the Computer Science Program at the University of Maryland (Asian Division) for 1 year. Before that I was an Assistant Professor and Lecturer in the Department of Electrical Engineering and Computer Science at the United States Military Academy, a.k.a. West Point, for 3 years.

3. In addition to my academic credentials, my professional experience includes 20 years of practice in the U.S. military, working primarily in a variety of technology-related and leadership positions.

4. I have authored approximately 250 academic publications, focusing on the areas of Web data, digital analytics, Web analytics, Web searching, Web search engines, social media analytics, and related areas. Approximately 200 of my publications address aspects of search
analytics, Web analytics, online advertising, search engines, or Web searching. My recent research work focuses on online news analytics, which is the investigation of the online qualitative and quantitative attributes of news stories, along with other digital content. I am also the editor-in-chief of the academic journal *Information Processing and Management*, and I was previously the editor-in-chief for 5 years of the academic journal, *Internet Research*. I have authored, co-authored, or co-edited four books, including *Web Search: Public Searching of the Web* (2007), *Understanding User – Web Interactions via Web Analytics* (2009) and *Understanding Sponsored Search* (2011). A copy of my complete curriculum vitae, which includes a list of all publications I have authored in the past 10 years, is attached as **Appendix A**.

5. My fields of professional expertise include web analytics, search engines, web searching, social media, online advertising, and related areas. In the course of my academic career, I have worked with a variety of search engines and information searching applications in order to understand user searching behavior on the Web and other environments. For example, as part of my Master’s program in computer science, I designed and coded a text-based search engine. For my Doctorate program in computer science, I developed a program interface for Web search engines and implemented it on the Gigabyte search engine. In subsequent research, I have worked with the Microsoft Internet Information Services (IIS) and Verity commercial searching systems.

6. Concerning user searching behaviors on the Web using web analytics, I have worked directly with real-user searching data from several search engines, including AOL, Alta Vista, Dogpile, Excite, and MSN Live. I’ve also analyzed web data of visitor traffic and other attributes from a variety of websites and social media platforms. I’ve analyzed real-user data from online search marketing campaigns and user referral traffic to websites. I have conduct research and teaching concerning aspects of websites and social media platforms, including keyword
advertising. I’ve developed web analytics models and processes for analysis of business goals, and I have used web analytics data and commercial tools in both my research and teaching. I’ve also conducted other research on user searching and related online behaviors. I have advised governmental agencies and companies in consulting and expert witnessing matters. A list of cases in which I have testified as an expert in deposition or trial in the past four years is attached as Appendix B. I am being compensated for my work on this case at the rate of $300 per hour.

III. ASSIGNMENT AND MATERIALS CONSIDERED

7. In providing my expert opinion, I have been asked to respond to the following question:

8. What is the dissemination of the statements from Ms. Maxwell referring to Ms. Giuffre’s declarations as “untrue” and “lies” from when the statements were made on 2 January 2015 to the date that I filed this report?

9. For brevity, I refer to references to the statements denoting Ms. Giuffre’s declarations as “untrue” and “lies”, any related accounts referring to those original statements, or similar statements from Ms. Maxwell or her representatives referring to Ms. Giuffre as the statements made against Ms. Giuffre, the statements from Ms. Maxwell’s message, or the message from Mr. Gow1.

10. My analysis is based on my experience, training, knowledge, and education and is formed through the application of that experience, training, knowledge, and education in the principles of web data collection, web analytics, web search, search engines, web sites, web traffic analysis, and related market analysis.

11. The materials that I considered in preparing this report are listed in Appendix C.

1 See, para. 30 and 32, Complaint, VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINÉ MAXWELL, Defendant. CASE NO. 1:15-cv-07433.
IV. SUMMARY OF OPINIONS

12. Based on my research and analysis in connection with this assignment, which is described in more detail in the body of this report, along with my own experience, training, knowledge, and education as stated below, I have reached the following opinion:

13. The statements made against Ms. Giuffre have been disseminated to at least 115 online media or other sites in 178 separate stories or articles with a combined 66,909,965 potential unique visitors since 2 January 2015 to the date that I filed this report, inclusive.

14. This is a conservative estimate, and it is more likely than not, the statements made by Ms. Maxwell against Ms. Giuffre have received wider dissemination due to factors such as:

   a. I used a set of online websites to measure dissemination, and it is reasonable that I have not located all references to the statements made against Ms. Giuffre on every website by the time of the submission of this report.

   b. I examined only online sources referencing the statements made against Ms. Giuffre and not print or broadcast media dissemination of the statements made against Ms. Giuffre.

   c. I have not attempted to measure face-to-face dissemination of articles containing the statements against Ms. Giuffre.

   d. I do not have access to certain online sources where articles containing the statements against Ms. Giuffre may have been disseminated (e.g., email messages, personal social media messages, articles behind firewalls, etc.).

   e. There are possibly sites that have hosted the statements made against Ms. Giuffre that I could not locate or where the statements have been removed.
There are sites that hosted the articles containing the statements made against Ms. Giuffre where the visitor data is not accessible or where I could not confirm the number of visitors.

I did not consider the dissemination via social media platforms of articles containing the statements made against Ms. Giuffre.

Many sites published multiple articles on multiple days that contained or referenced the statements made against Ms. Giuffre; however, I did not include these multiple publication dates in calculating unique daily visitors.

I did not include unique daily visitors to articles that link from that article to one or more of the articles containing the statements made against Ms. Giuffre.

Finally, I did not include the counts of those who may have been searching and seen the statements made against Ms. Giuffre in the search results listing.

V. BACKGROUND WEB ANALYTICS FOR TRAFFIC ANALYSIS

In the course of forming this opinion, I implemented numerous web analytics and related techniques commonly used in the industry. In order to more clearly discuss these techniques, I define the following terms:

- **Direct Traffic**: visitors to a website that come from entering a website link into a browser location bar (e.g., not coming via a link on another website).

- **Dissemination**: the act of spreading or the circulation of information or articles.

- **Domain**: a specific Internet website that are administered as a unit and defined by an Internet Protocol (IP) address.
• **Reach**: the percentage or number of people who visit a website out of the total targeted population.

• **Referral Traffic**: visitors to a site that come from websites other than search engines.

• **Repeat Visits**: visitor traffic to a website in a given period that just includes multiple visits from the same set of IP addresses (i.e., IP addresses with more than one visit); provides a count of the people who have visited a site more than once in a given period. An individual is usually defined by a combination of IP address and browser within a given period but can also be defined by more sophisticated methods.

• **Search Engine**: a program and associated hardware and processes that allows people to find information on the Web, typically via the submission of queries consisting of terms.

• **Search Traffic**: visitors to a site that come from search engines rather than from other websites or via direct navigation.

• **Search**: a submission of a query to a search engine, usually in the form of terms forming a query.

• **Share**: sharing of an article or webpage typically via some social media platform.

• **Social Media**: content that is shared via a social networking website.

• **Unique Visits**: visitor traffic to a website within a given period that includes only the first visit (i.e., subsequent visits are ignored), which excludes repeat visits; provides a count of the individuals who have visited a site in a given period.
- **Unique Daily Visitors**: visitor traffic to a website who visits a site at least once in a given 24-hour period. Each visitor, to the site, is counted once during the reporting period, which means it excludes repeat visits; provides a count of the individuals who have visited a site on a given day.

- **Visits**: a count of all the traffic to a website in a given period, including both unique and repeat visits.

- **Web Analytics**: the measurement, collection, analysis and reporting of web data.

**VI. METHODOLOGY**

16. I was asked to determine the dissemination of articles containing the statements made against Ms. Giuffre.

17. In forming my opinion, I utilized accepted web analytics and related methodologies in developing my assessment.

18. To that end, I employed various publicly available online analytic services, as well as some subscription-based services in conducting my research, including:

- **Alexa**: an online service that provides web traffic data and analysis.
- **Compete**: an online service that provides web traffic data and analysis.
- **Google Keyword Tool**: an online service that provides the number of searches for a given set of keywords in a given month on the Google search engine.
- **Google Trends**: an online service that shows how often a particular term is relatively searched on the Google search engine in a given period.
- **SimilairWeb**: an online service that provides web traffic data and analysis.
- **SpyFu**: an online service providing search data and analytics, including for both paid (i.e., advertisements) and organic (i.e., natural or algorithmic) channels.
- **W3Snoop**: an online service that provides web traffic data and analysis.
19. These tools offer a variety of data and analysis services, and they are frequently utilized by industry professionals in the search engine optimization, web analytics, and search engine marketing fields for market, customer, and competitive analysis. Furthermore, where possible, I did my own assessments, as outlined below, in order to validate the data and analysis results.

20. I also utilized search engines, primarily Google and Bing, to assess the dissemination of articles containing the statements made against Ms. Giuffre.

21. Whenever possible, I used multiple data sources, which is a data verification technique known as triangulation\(^2\), where one uses multiple and disparate sources for analysis and then compare the results from the separate analysis. If the results are similar, it reinforces the conclusion that the overall data analysis is valid.

22. In all of my assessments, I have used the most conservative numbers, meaning that I use the smallest value in arriving at the dissemination of articles containing the statements made against Ms. Giuffre. If I had not employed this conservative estimate, the number of potential dissemination of the articles containing the statements made against Ms. Giuffre would be 102,740,816 (i.e., more than 102 million) daily unique visitors.

23. In situations where I believed that I could not adequately verify the number of individuals or did not have confidence in the numbers in those situations, I did not include those numbers in the calculation of daily unique visitors.

24. My analysis is based on my experience, training, knowledge, and education and is formed through the application of that experience, training, knowledge, and education in the

\(^2\) Triangulation (social science) http://en.wikipedia.org/wiki/Triangulation_%28social_science%29
principles of web data collection, web analytics, web search, search engines, web sites, and related areas.

VII. **DISSEMINATION OF THE STATEMENTS MADE AGAINST MS. GIUFFRE**

25. My opinion is that articles containing the statements made against Ms. Giuffre have been disseminated to at least 115 online media and others sites in 178 separate stories or articles with a combine 66,909,965 unique daily visitors.

26. This is a conservative estimate, and it is more likely than not, the statements have received wider dissemination due to factors such as:

a. I used a set of online websites (115) to calculate the dissemination of articles, and it is reasonable that I have not located all references to the statements made against Ms. Giuffre by the time of the submission of this report. So, there may be more sites with articles containing the statements made against Ms. Giuffre that are not included in my calculations.

b. My focus of analysis was the online dissemination of the statements made against Ms. Giuffre. Therefore, I examined only online sources and not dissemination of the statements made against Ms. Giuffre via print or broadcast media. It is reasonable to assume that the statements made against Ms. Giuffre were disseminated via these other channels.

c. I have not attempted to measure face-to-face dissemination of the statements made against Ms. Giuffre. Therefore, these sources of dissemination are not included in the count of daily unique visitors.

d. I did not have access to certain online sources where the statements against Ms. Giuffre may have been disseminated (e.g., email messages, social media messages,
articles behind firewalls, etc.). Therefore, these sources are not included in the count of daily unique visitors.

e. There may be sites that have hosted articles containing the statements made against Ms. Giuffre where the articles have been removed. Therefore, I did not include these sites in my calculation of the unique daily visitors.

f. There are sites where the visitor data is not accessible or where I could not reasonably check the number of visitors. In these cases, even though I had confirmed the site had posted one or more articles containing the statements made against Ms. Giuffre, I did not include these sites in my calculation of the unique daily visitors.

g. I did not consider the dissemination via social media platforms of articles containing the statements made against Ms. Giuffre.

h. Many sites published multiple articles on multiple days that contain or reference the statements made against Ms. Giuffre; however, I did not use these multiple articles from the same site with different publication dates in my calculations in determining the number of daily unique visitors who have been exposed to the articles containing the statements made against Ms. Giuffre.

i. I did not include articles that link to one or more of the articles containing the statements made against Ms. Giuffre. Unless the article directly referenced the statements made against Ms. Giuffre, I did not include it in my analysis.

j. Finally, I did not include people who may have searched and may have seen the statements made against Ms. Giuffre in the search results, without needing to visit the actual articles posted on the websites.
VIII. METHODOLOGY TO DETERMINE THE DISSEMINATION OF THE STATEMENTS MADE AGAINST MS. GIUFFRE

27. I have been informed that the statements made against Ms. Giuffre were originally contained in an email message from Mr. Ross Gow⁢, of Acuity Reputation, acting on behalf of Ms. Maxwell, that was sent on 2 January 2015 at 8:38 pm⁴ to, based on the email addresses⁵, people at The Mail Online⁶, The Independent⁷, The Mirror⁸, The Times⁹, and the BBC¹⁰. The email message from Mr. Gow contained the statements made against Ms. Giuffre. A screen shot of the email message is shown in Figure 1.

28. Figure 1: Email message from Mr. Ross Gow containing the statements made against Ms. Giuffre.

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³ GM_00068 (Gow E-Mail)
⁴ I am assuming, based on the location of Mr. Gow’s company, Acuity Reputation, that this is date-time stamp for the United Kingdom.
⁵ Note: For some reason, the contact at the Mail Online is on the cc: line, while the other recipients are in the to: line. Also, the email message is sent to two recipients at the BBC.
⁶ https://en.wikipedia.org/wiki/Mail_Online
⁷ https://en.wikipedia.org/wiki/The_Independent
⁹ https://en.wikipedia.org/wiki/The_Times
29. I have been informed that the statements made against Ms. Giuffre were confirmed by Ms. Maxwell in a news article and video\textsuperscript{11} aired on 5 January 2015, which I have established by reviewing the video referenced in the news article\textsuperscript{12}.

\textsuperscript{11} GIUFFRE001120

\textsuperscript{12} http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505
30. Additionally, on 8 January 2015, agents reportedly acting on behalf of Ms. Maxwell made statements that the allegations against her were a “web of lies and deceit”\(^{13}\), which are similar to the statements made against Ms. Giuffre in the message from Mr. Gow.

31. Similarly, on 1 February 2015, like statements were quoted as “These allegations are untrue and defamatory”\(^ {14}\), which are similar to the statements made against Ms. Giuffre in the message from Mr. Gow.

32. Based on my investigation and research, news stories, articles, and postings containing direct reference to or quotes from the statements made against Ms. Giuffre appeared the same day (i.e., 2 January 2015) as the email from Mr. Gow, with several news organizations and other sites publishing other articles containing direct reference to or quotes from the statements made against Ms. Giuffre in the immediately following days. News articles containing direct reference to or quotes of the statements made against Ms. Giuffre have continued to appear in news articles and other postings nearly up to the date that I submitted this report.

33. A timeline of events relating to the dissemination of the statements made against Ms. Giuffre is shown in Figure 2.

34. **Figure 2: Timeline of events relating to the dissemination of the statements made against Ms. Giuffre from 2 January 2015 onwards.**


35. Concerning the procedure employed in determining the dissemination of the statements made against Ms. Giuffre, nearly every major news site\textsuperscript{15} that I investigated, along with other specific news sites in the United States, the United Kingdom, Canada, and Australia, as well as other countries, have carried some aspects of the overall story related to Ms. Giuffre and/or Ms. Maxwell, or other parties involved.

36. In fact, there are tens of thousands of news articles and postings concerning the general story from news outlets worldwide, with combined potential viewership in the multi-millions, as searches on the major search engines, such as Google and Bing, show.

37. However, I was not interested in news articles that just discussed the story in general or other aspects of the story. Also, I was not interested in those articles where Ms. Maxwell or those acting on her behalf, such as Mr. Gow, would just generally deny the allegations in the complaint. I was specifically interested in only those articles that referenced directly or quoted the statements made against Ms. Giuffre in the 2 January 2015 email message from Mr. Gow, Ms. Maxwell’s subsequent confirmation of the statements, or similar statements as those in the message from Mr. Gow. Naturally, this narrow focus is a smaller subset of news articles than are the articles addressing the overall story.

38. To isolate these articles of interest, I generated a series of 10 queries that specifically targeted news articles from the case that addressed the statements made against Ms. Maxwell (e.g., Ghislaine Maxwell obvious lies) to retrieve a set of articles that directly related to the statements made against Ms. Giuffre. I employed a modified snowball technique, starting with one seed query, adding and modifying terms, until I was not retrieving new results. I also located some articles via navigating from the set of retrieved articles.

39. I set the search range date from 2 January 2015 onward, so articles prior to that date were not included in the search results. For each article used in my analysis, I also verified the date that the article was published to ensure it was published on or after 2 January 2015 and that the articles directly referenced in some way the statements made against Ms. Giuffre.

40. An example of a search engine results page in response to one of these queries is shown in Figure 3.

---

17 Ghislaine Maxwell obvious lies, Ghislaine Maxwell Roberts obvious lies cnn, Ghislaine Maxwell Virginia Roberts, Giuffre Maxwell obvious lies, new york daily news alleged madam andrews, Prince Andrew Maxwell Roberts, Prince Andrew obvious lies, prince andrew's sex slave scandal who is maxwell, Ross Gow obvious lies, sex slave obvious lies.
18 In addition to the queries, I located some articles via direction navigation.
Figure 3: Google News search results for the search *Ghislaine Maxwell* *obvious lies* with a date delimiter beginning on 2 January 2015.

42. I then personally verified that each article, by reviewing each article, used in my analysis directly referenced in some way the statements made against Ms. Giuffre.

43. So, articles relating to the overall story that did not mention Ms. Maxwell’s statements made against Ms. Giuffre were not included in the analysis. Articles relating to the overall story that referred to Ms. Maxwell simply denying the charges were not included.

44. I also personally performed a site search\(^{20}\) of the top 15 online media sites worldwide\(^{21}\) of articles related to the case, and I reviewed the results to identify if any of these

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\(^{20}\) https://www.google.com/advanced_search

articles referred to the statements against Ms. Giuffre. I also did the same for many country-specific news sites in the United States, the United Kingdom, Canada, and Australia.

45. In the end, I had a set of 178 online news and other articles from 2 January 2105 to the date that I filed this report that specifically referenced the statements made against Ms. Giuffre to conduct my analysis, as outlined below.

46. Each of these 178 online articles was posted online. The 178 online articles were distributed among 115 unique domain websites (i.e., some websites posted multiple articles that contain the statements made against Ms. Giuffre). These 115 domains are:

- http://beforeitsnews.com
- http://boltonbnp.blogspot.com
- http://businessnewsusa.org
- http://dukefmduluth.com
- http://dukefinfargo.com
- http://home.bt.com
- http://jewishbusinessnews.com
- http://jewishnews.timesofisrael.com
- http://kdal610.com
- http://kfg.com
- http://motivatornews.com
- http://mrharrywales.tumblr.com
- http://muhammad-ali-ben-marcus.blogspot.com
- http://news.sky.com
- http://news.trust.org
- http://newsbite.it
- http://newstoday.club
- http://normanfinkelstein.com
- http://onewayempire.com
- http://pagesix.com
- http://planetinvestigations.com
- http://softwaresuites.ne
- http://thisviral.com
- http://townhall.com
- http://ugandansatheart.blogspot.com
- http://uk.reuters.com
- http://whatiswrongwiththispicture2012.blogspot.com
- http://whbl.com
- http://whtc.com
http://wibqam.com
http://wifc.com
http://wincountry.com
http://wkzo.com
http://worlddailynews.info
http://wsau.com
http://wtaq.com
http://wtvbam.com
http://www.anorak.co.uk
http://www.aol.co.uk
http://www.asianimage.co.uk
http://www.bailiwickexpress.com
http://www.bannednews.net
http://www.bbc.com
http://www.belfasttelegraph.co.uk
http://www.bournemouthecho.co.uk
http://www.businessinsider.com
http://www.business-standard.com
http://www.capitalbay.news
http://www.clactonandfrintongazette.co.uk
http://www.courthousenews.com
http://www.dailylife.com.au
http://www.dailymail.co.uk
http://www.dailyrecord.co.uk
http://www.darkpolitricks.com
http://www.dudleynews.co.uk
http://www.eveningtimes.co.uk
http://www.express.co.uk
http://www.faceiraq.com
http://www.ghanagrio.com
http://www.ghanareview.com
http://www.govtslaves.info
http://www.headlines-news.com
http://www.huffingtonpost.co.uk
http://www.ibtimes.co.uk
http://www.independent.ie
http://www.infiniteunknown.net
http://www.iol.co.za
http://www.irishexaminer.com
http://www.irishmirror.ie
http://www.irishtimes.com
http://www.itv.com
http://www.lancashiretelegraph.co.uk
http://www.lse.co.uk
- http://www.mgtowhq.com
- http://www.mirror.co.uk
- http://www.msn.com
- http://www.nationalenquirer.com
- http://www.newindianexpress.com
- http://www.newscopia.com
- http://www.newsday.com
- http://www.newsgrio.com
- http://www.nydailynews.com
- http://www.nzherald.co.nz
- http://www.oneworldofnations.com
- http://www.oxfordmail.co.uk
- http://www.pressreader.com
- http://www.reuters.com
- http://www.scmp.com
- http://www.scotsman.com
- http://www.somersetlive.co.uk
- http://www.srnnews.com
- http://www.swindonadvertiser.co.uk
- http://www.telegraph.co.uk
- http://www.theargus.co.uk
- http://www.theboltonnews.co.uk
- http://www.thedailybeast.com
- http://www.thetelegraphandargus.co.uk
- http://www.thetruthseeker.co.uk
- http://www.twimovies.news
- http://www.westernmorningnews.co.uk
- http://www.wirralglobe.co.uk
- http://www.yorkpress.co.uk
- http://www.yorkshirepost.co.uk
- https://blairzhit.wordpress.com
- https://bol.bl.bna.com
- https://ca.news.yahoo.com
- https://circusbuoy.wordpress.com
- https://quartetbooks.wordpress.com
- https://thetruth24.info
- https://www.eveningtelegraph.co.uk
- https://www.theguardian.com
- https://www.thesun.co.uk
- https://www.yahoo.com
- http://ferddyjay.blogspot.com
47. As seen from the list of domains that have published articles or stories containing references to the statement made against Ms. Giuffre, many of these domains are those of major news organizations or sources, including AOL News, BBC, Huffington Post, International Business Times, Irish Times, MSN News, National Enquirer, New York Daily News, New Zealand Herald, Page Six, Radar Online, Reuters, The Daily Beast, The Daily Mail, The Express, The Guardian, The Mirror, The Sun, The Telegraph, Yahoo! News, etc.

48. I then used a variety of web analytics traffic services and other sources to get the unique daily visitor traffic for each of these domains. I used multiple services when available to verify the unique daily visitor traffic for each of these domains, as these traffic services may use different techniques to arrive at their traffic numbers.

49. In cases of conflicting unique daily visitor traffic numbers, I utilized the most conservative (i.e., smallest) number.

50. In cases where I determined I could not get unique daily visitor traffic numbers or the unique daily visitor traffic were not reliable, in my opinion, I did not include the unique daily visitor traffic numbers for that domain in the numbers. This usually occurred for the sites with a smaller number of daily visitors or sites with an extremely large number of daily visitors.

51. *Unique daily visitors* measure is an industry standard web analytics metric for measuring people that visit a website in a given day, also known as unique audience\(^{22}\). It is generally averaged out over multiple days with a given period, such as week or month, as there are normal daily fluctuations.

52. Table 1 shows the unique daily visitor traffic for the listed domains that posted articles or stories referencing the statements made against Ms. Giuffre and the associated unique

daily visitor traffic for each of those domains, along with number of articles containing the
statements made against Ms. Giuffre posted on that site.

53. **Table 1: Domains that published articles or stories containing the statements**
    made against Ms. Giuffre with the domain’s number of unique daily visitors and the
number of articles containing the statements made against Ms. Giuffre published on that
domain from 2 January 2015 to the date that I filed this report²³.

<table>
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<th>Domain Unique Visitor Traffic (Daily)</th>
<th>Number of Articles Published</th>
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²³ Note: Some outlets, I was able to get self-reported visitor numbers, such as the https://www.theguardian.com.
<table>
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</tbody>
</table>

- Unique daily visitor traffic not available
- Unique daily visitor traffic not verifiable

54. I used each domain’s unique daily visitor count to calculate the dissemination of the articles containing the statements against Ms. Giuffre to various websites and potentially to visitors to that site (i.e., as visitors to the news sites, these individuals could have been exposed to the articles containing the statements made against Ms. Giuffre), using the unique daily visitor number only once for each domain, regardless whether that domain published more than one article referring to the statements made against Ms. Giuffre.

IX. RESULTS FOR ANALYSIS OF THE DISSEMINATION OF THE STATEMENTS MADE AGAINST MS. GIUFFRE

55. Based on my analysis as outlined above, my opinion is that the statements against Ms. Giuffre have been disseminated to at least 115 online media and other sites with 178 stories or articles with a combined 66,909,965 (more than 66 million) unique daily visitors traffic.

56. I note that for many of the 178 articles containing the statements made against Ms. Giuffre, one could get gist of the story of the article directly from the article headline. I point this out as it is well known that people skim online news sites, so titles such as these...

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would have substantial impact on visitors to that site. Examples of such articles headlines (examples of actual headlines from the 178 articles) are:

- British socialite to face Epstein accuser's defamation lawsuit
- Alleged Epstein madam denies calling teen ‘sex slave’ a liar
- Sex-Trafficking Denials Aren't Libel, Brit Says
- U.S. woman who claimed she was forced to have sex with Prince Andrew sues British socialite for denying that she recruited her to be a sex slave
- British 'madam' accused of recruiting teenage 'sex slave' Virginia Roberts for Prince Andrew's friend Jeffrey Epstein denies calling her a liar
- Ghislaine Maxwell denies calling Virginia Roberts a liar
- Bill Clinton Pedophile Sex Scandal: Socialite Denies Calling ENQUIRER Source A Liar, Woman files defamation suit against British publishing magnate
- Jeffrey Epstein sex slave accuser sues Brit socialite for defamation
- Lawyers for British socialite accused of pimping 'sex slave' to Jeffrey Epstein push to dismiss defamation lawsuit.

57. This is a conservative estimate, and more likely than not, articles containing the statements made against Ms. Giuffre have been disseminated to more individuals.

X. WHY THE ESTIMATE IS LOW

58. This (66,909,965 individual unique daily traffic) is a conservative estimate, and it is more likely than not, the statements have received wider dissemination due to factors such as:

a. Although I spend considerable effort to locate published articles that contained the statements made against Ms. Giuffre, it is reasonable to assume that I have not located all such articles by the time of the submission of this report. So, there are possibly more
sites with articles containing the statements made against Ms. Giuffre that are not included in my calculations, which would increase the dissemination of the articles.

b. The focus of my analysis was the dissemination of online articles containing the statements made against Ms. Giuffre, and I examined only online sources and not print or broadcast media. Many of the media outlets that I did identify have considerable print distribution, which are not included in my calculations, for example, such as:

- The Sun (print circulation) 1,741,838
- Daily Mail (print circulation) 1,562,361
- The Daily Telegraph (print circulation) 472,936
- The Times (print circulation) 402,752
- The Guardian (print circulation) 161,152

c. In my analysis, I did not attempt to measure face-to-face dissemination that may have occurred after individuals may have read articles containing the statements made against Ms. Giuffre, which would increase the count.

d. Naturally, I could not access certain online sources where the statements made against Ms. Giuffre may have been disseminated (e.g., email messages, social media messages, articles behind firewalls, etc.). Therefore, these numbers are not included in my calculations.

e. Also, there are possibly sites that have hosted articles containing the statements made against Ms. Giuffre where the articles have been removed. Therefore, they are not included in my calculations.

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f. For sites where one or more of the articles containing the statements made against Ms. Giuffre are posted but where I could not locate or determine reliable daily unique visitor traffic, I have not included these sites in my calculations. There are 59 (of the 115 sites, 51.3%) where I could not get or not get verifiable traffic data. For example, the traffic numbers for the MSN News (Microsoft) and Yahoo! News are not separated by news and other services, such as search, so I did not include these in the number of people to which the articles containing the statements made against were disseminated.

g. I did not include the dissemination of the articles containing the statements made against Ms. Giuffre directly to social media platforms. However, many of the articles containing the statements made against Ms. Giuffre do include counts of the number of times that individuals shared the article to a social media networks, as shown in Table 2.

i. **Table 2: Number of social media shares by published article containing the statements made against Ms. Giuffre.**

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ii. As shown in Table 2, the articles containing the statements made against Ms. Giuffre have been shared 33,758 times, mostly on Facebook.

iii. Given that the median number of Facebook ‘friends’ is 200\(^{26}\), this equates to a possible 6,751,600 individuals, in addition to the 33,758 individuals who originally shared

\(^{26}\) [http://www.pewresearch.org/fact-tank/2014/02/03/6-new-facts-about-facebook/](http://www.pewresearch.org/fact-tank/2014/02/03/6-new-facts-about-facebook/)
the articles, to which the articles containing the statements made against Ms. Giuffre could have been disseminated, assuming these individuals are all unique and have not already read one of the articles.

iv. However, I did not include these social media shares in my calculations.

v. Since news article viewing follows a power law distribution, there is no direct linear ratio of number of social media shares to readership. There is published research that does report average of views of an article on a news website and also average social media shares. In a direct calculation with numbers from this article, 23 articles views per social media share, using 33,758 social media shares, this would be 776,434 article views. However, this ratio would vary by website, number of daily unique visitors, type of news article, time for accumulating shares, and possibly other factors. Plus, this number would not account for the people receiving the social media share that viewed the title, post, and snippet but did not click on the share to view the article on the website, thereby undercounting views of the articles.

vi. Also, given the topical nature of the underlying news story, one could expect lower social media sharing but higher article viewing, as people will tend to read articles on such topics privately but not share on social media. So, I would expect the social media number itself to be an undercount.

h. I did not include articles that link to one of the articles containing the statements made against Ms. Giuffre in my calculations of dissemination. Unless the article

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27 https://en.wikipedia.org/wiki/Power_law
directly mentioned the statements made against Ms. Giuffre, I did not include that article in my calculations. So, unless the linking article actually mentioned, referenced, or quoted the statements made against Ms. Giuffre, I did not include it in the calculations.

i. Many sites published multiple articles on multiple days that quoted or referenced the statements made against Ms. Giuffre; however, I did not use these multiple publication dates from the same site in my calculations of unique visitor traffic. If a domain published only one article containing the statements against Ms. Giuffre, then I directly used the unique daily visitors number. If a domain published multiple articles concerning the statements against Ms. Giuffre, I did not count the traffic for the subsequent articles containing the statements made against Ms. Giuffre, even though research shows that repeat traffic to websites is generally only about 30%, meaning that 70% of the traffic would be unique. However, I was not comfortable using this figure given the nature of these sites, which might have higher repeat visitors day-to-day. Therefore, I did not include the unique visitors to multiple articles in my calculations.

j. Finally, I did not include the count of people who may have been searching and may have seen the statements made against Ms. Giuffre in the search results, without needing to visit the actual articles, as shown in Figure 4.

k. Figure 4: Example of search results with the statements made against Ms. Giuffre appearing in the result snippets, requiring no need to visit the articles themselves.

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XI. **ACCURACY OF THE TRAFFIC NUMBERS AND ADDITIONAL VERIFICATION**
59. Concerning the accuracy of the analysis, the number of domains where the statements made against Ms. Giuffre have been disseminated is reliable, as this is straightforward to verify (i.e., the article is either posted on a site or it is not). If anything, this is an undercount, as some domains, for example, may have removed such articles, making them no longer available. There are possibly articles containing the statements that I have not been able to locate by the time that I submitted this report.

60. Concerning traffic numbers for domains, a unique visitor is typically identified by an identifier stored in a text file, which is based on an individual computer’s browser, although more sophisticated methods are also being used. In locating traffic numbers for the domains, I used multiple services when available and attempted to verify via other sources. In case with varying traffic data, I utilized the most conservative (i.e., smallest) number available.

61. I also verified findings from my analysis via other methods and my own experience and training. For example, there are periods of increased publishing of articles containing the statements made against Ms. Giuffre and related stories. One would expect, increases in associated searching during these periods. Using the Google Keyword Tool, which provides search volume for search queries by month, I examined search volume from January 2015 to the date that I filed this report. There was an 54,518% increase in search volume for the keywords Virginia Giuffre Virginia Roberts Ghislaine Maxwell in January 2015, relative to the prior 7 months, in the US, and a 44,822% increase for the United Kingdom (UK) in January 2015, relative to the prior 7 months. This is in line with the increase in posting of articles during the same month33. So, one sees the expected increase in searching for key terms based on the increase posting of articles.

33 Note: I use the US and the UK as sample countries since there are aspect of the story that relate to each country.
62. Figure 5 shows increase in searching volume in January 2015 for the US and UK relative to the previous 7 months.

63. **Figure 5:** Increase in search volume in January 2015 for the US and UK relative to the previous 7 months for the keyphrase *Virginia Giuffre Virginia Roberts Ghislaine Maxwell.*

![](image)

12 **SUMMARY**

64. The statements made against Ms. Giuffre have been disseminated to at least 115 online media or other sites in 178 separate stories or articles with a combined 66,909,965 individual unique visitors from 2 January 2015 to the date that I filed this report, inclusive. More likely than not, this is a conservative estimate.

65. Right to Amend: Although I have had access to materials publicly available pertaining to claims in this dispute, I have not been able to review all the material by the deadline for completion of this report. I reserve the right to review and rely on any such material, including at the time of trial. I also reserve the right to issue a supplemental or an amended report if my review of such material results in any significant change or addition to my opinion.
Respectfully submitted,

DATED: 09 September 2016

By______________________________

Dr. Bernard J. Jansen
Professor
College of Information Sciences and Technology
The Pennsylvania State University
University Park, PA, 16802
Phone: 434-249-8687
Email: jjansen@acm.org
URL: http://ist.psu.edu/faculty_pages/jjansen/
Appendix A Curriculum Vitae

Full Professor
College of Information Sciences and Technology
The Pennsylvania State University
University Park, Pennsylvania 16802, USA
Voice: +1-434-249-8687
Fax: 814-865-6426
Email: ijansen@acm.org
LinkedIn: www.linkedin.com/in/ijansen/
Blog: http://iimijansen.blogspot.com/

Principal Scientist, Social Computing Group, Qatar Computing Research Institute (QCRI), Hamad Bin Khalifa University, Doha, Qatar

Affiliate Appointment, Department of Computer Science and Engineering, The Pennsylvania State University

Affiliate Appointment, Department of Industrial and Manufacturing Engineering, The Pennsylvania State University

Director, Information Searching and Learning Laboratory, College of Information Sciences and Technology (ISL²), The Pennsylvania State University

Current Advisory Boards
- The Pennsylvania Technical Assistance Program (PennTAP) (http://penntap.psu.edu/)
- CLAK Impressions (http://www.linkedin.com/company/clak-impressions)
- Innoblue (http://www.linkedin.com/company/innoblue)

Research

Research Goal: Increase the effectiveness and efficiency for accomplishing information tasks by improving the interaction among people, information, and technology

Research Interests:
I study the uses and affordances of the Web for information searching and e-commerce, with a focus on interactions among the person, information, and technology. Current active research areas are Web searching, information retrieval, keyword advertising, online marketing, and online social networking within the e-commerce domain.

- Sponsored search and keyword advertising
- Social media as an information source
- Information searching and Web information retrieval

Short Bio:
Jim has authored or co-authored 250 or so research publications, with articles appearing in a multi-disciplinary and extremely wide range of journals and conferences. He is author of the book, Understanding Sponsored Search: A Coverage of the Core Elements of Keyword
Research


Jim is a full professor with the College of Information Sciences and Technology at The Pennsylvania State University and a Principal Scientist in the social computing group of the Qatar Computing Research Institute, Hamad bin Khalifa University. He is a graduate of West Point and has a PhD in computer science from Texas A&M University, along with master degrees from Texas A&M (computer science) and Troy State (international relations).

Jim is editor-in-chief of the journal, Information Processing & Management (Elsevier), a member of the editorial boards of seven international journals, former editor-in-chief of the journal, Internet Research (Emerald), and he has served on the research committee for the Search Engine Marketing Professional Organization (SEMPO). He has received several awards and honors, including an ACM Research Award and six application development awards, along with other writing, publishing, research, teaching, and leadership honors.

He has served as a Senior Fellow at the Pew Research Center with the Pew Internet and American Life Project and a university expert with the National Ground Intelligence Center. He is a Principle Scientist at the Qatar Computing Research Institute.

He has done several consulting projects (log analysis, statistical analysis) and expert witnesses cases (patent litigation, civil litigation, and class action suits) in the areas of keyword advertising, web analytics, co-registration, domain parking, webpage access, webpage history, and online advertising click fraud.

Education

Ph.D. Computer Science, August 1999 - May 1996
Texas A&M University, College Station, Texas 77843
Dissertation: A Software Agent for Performance Improvement of an Existing Information Retrieval System
Advisor: Dr. Udo Pooch

M.CS. Computer Science, May 1996 - June 1994
Texas A&M University, College Station, Texas 77843
Research Area: Network Performance and Monitoring

M.S. International Relations, August 1994 - June 1992
Troy State University, European Division
Research Thesis: National Competitive Advantage

B.S. Computer Science, May 1985 - June 1981
United States Military Academy, West Point, New York 10996
Engineering Sequence: Electrical Engineering
Academic Appointments

Current - 2014  Full Professor, College of Information Sciences and Technology, The Pennsylvania State University, University Park, PA, 16802, USA.

Current - 2015  Principal Scientist, Qatar Computing Research Institute (QCRI), Hamad Bin Khalifa University, Doha, Qatar

2014 - 2011  University Researcher, National Ground Intelligence Center, 2055 Boulders Road, Charlottesville, VA 22911

2014 - 2009  Associate Professor, College of Information Sciences and Technology, The Pennsylvania State University, University Park, PA, 16802, USA.

2012 - 2010  Senior Fellow, Pew Internet and American Life Project, Pew Research Center, 1615 L Street, NW Suite 700 Washington, DC 20036

2009 - 2003  Assistant Professor, College of Information Sciences and Technology, The Pennsylvania State University, University Park, PA, 16802, USA. (Previously, School of Information Sciences and Technology)

2003 - 2001  Instructor, School of Information Sciences and Technology, The Pennsylvania State University, University Park, PA, 16802, USA

2000 - 1999  Lecturer, Computer Science Program, University of Maryland (Asian Division), Seoul, 104-022, Republic of Korea

1999 - 1998  Assistant Professor, Department of Electrical Engineering and Computer Science, United States Military Academy, West Point, New York, 10996

1998 - 1996  Lecturer, Department of Electrical Engineering and Computer Science, United States Military Academy, West Point, New York, 10996, USA.

Honors and Awards

2016  2016 President's Award for Engagement with Students, The Pennsylvania State University, University Park, Pennsylvania.


2011  Teaching and Learning with Technology Fellow at Penn State (May 2011 – May 2012). Teaching research fellowship to develop subject-based learning apps that leverage cellular technology, the contextual (location-aware) attributes of mobile technology, and social media. See tlt.its.psu.edu/2011/07/24/jim-jansen/
Honors and Awards

2011 **Paper Award:** The article, *The Seventeen Theoretical Constructs of Information Searching and Information Retrieval*, published in *Journal of the American Society for Information Science and Technology* selected as John Wiley Best JASIST Paper Award 2011 (see http://www.asis.org/awards/jasis_paper.html).

2010 **Emerald Literati Network 2010 Award for Excellence for Outstanding Reviewer** for the journal *Internet Research* (http://info.emeraldinsight.com/authors/literati/index.htm).


2008 Presented with a **Google Faculty Research Award** ($50,000)


The article was identified in May 2003 by ISI Essential Science Indicators to be one of the most cited papers in the research area of Web Searching Behavior.


2002 **Two Crystal Awards of Excellence** for outstanding software development in the communications field.
honors and awards


2002 award of distinction for interactive web site development.

2002 two awards of excellence for exceptional multimedia application development.

2002 US Army War College Team of the Year for outstanding contributions as team manager.

2001 U.S. Army Visual Information Award for multimedia development.


1992 Writing and Research Award, U.S. Marine Corps University.

1992 Research Award from U.S. Army Trainer Journal

books


Books


Parts of Books


**Parts of Books**


**Refereed Journal Articles**


Refereed Journal Articles


**Refereed Journal Articles**


Rosso, M. A. and Jansen, B. J. (2010) *Brand Names as Keywords in Sponsored Search Advertising*. *Communications of the Association for Information Systems*. 27(1), Article 6. Available at: [http://aisel.aisnet.org/cais/vol27/iss1/6](http://aisel.aisnet.org/cais/vol27/iss1/6)

**JASIST Best Paper**


Recognized as one of the **top 10 most highly cited papers in JASIST** published since 2001 [http://www.asis.org/Bulletin/Aug-12/AugSep12_Bar-Ilan.html](http://www.asis.org/Bulletin/Aug-12/AugSep12_Bar-Ilan.html)


44
**Refereed Journal Articles**


The most cited article in IP&M published since 2008  
(http://www.journals.elsevier.com/information-processing-and-management/most-cited-articles/)


Refereed Journal Articles


One of the Top 25 most cited articles in IP&M published since 2008 (http://www.journals.elsevier.com/information-processing-and-management/most-cited-articles/)


### Refereed Journal Articles


Routinely listed as one of the most downloaded articles published in IP&M
(http://www.journals.elsevier.com/information-processing-and-management/most-downloaded-articles/)


Refereed Journal Articles


Recognized as one of the top 10 most highly cited papers in JASIST published since 2001 http://www.asis.org/Bulletin/Aug-12/AugSep12_Bar-Ilan.html

Highly Cited

Highly Cited


Recognized as the most highly cited paper in JASIST published since 2001 http://www.asis.org/Bulletin/Aug-12/AugSep12_Bar-Ilan.html

48
Refereed Journal Articles


Book Reviews


Book Reviews


Non-refereed Articles


Non-refereed Articles


Manuscripts Accepted for Publication

Liu, Z., and Jansen, B. J. (forthcoming) *Predicting the Response Rate in Social Question and Answering on Sino Weibo*. **Information Processing & Management**.


Manuscripts Submitted for Publication

Mukherjee, P. and Jansen, B. J. (under review) *Brand Conversing and Brand Searching: A Temporal Analysis of Social Media and Search Concerning Super Bowl 2015 Commercials*. **Internet Research**.

Refereed Conference Proceedings

Refereed Conference Proceedings


Refereed Conference Proceedings


Refereed Conference Proceedings


Refereed Conference Proceedings


55
Refereed Conference Proceedings


Best Paper Award


Refereed Conference Proceedings


Refereed Conference Proceedings


Refereed Conference Proceedings


Refereed Conference Proceedings


Refereed Conference Proceedings


Paper Award

Jansen, B. J. (1997)
Refereed Conference Proceedings


Papers Presented at Technical and Professional Meetings


Papers Presented at Technical and Professional Meetings


Jansen, B. J. (2012) Using Mobile Apps to Enhance Classroom Learning. Teaching and Learning with Technology, University Park, PA, 24 March


Spink, A. and Jansen, B. J. (2007) *Web Research - Results from Large-Scale Web Data Analysis*, ARC Research Network Enterprise Information Infrastructure Workshop on Data From the Field. Sydney, Australia. 24th May.


http://www.york.ac.uk/res/siru/icsspinketal.htm
Papers Presented at Technical and Professional Meetings


Papers Presented at Technical and Professional Meetings


Scholarly Reports


http://www.pewinternet.org/Reports/2010/Paying-for-Content.aspx


<table>
<thead>
<tr>
<th>Funded Projects, Grants, Commissions, and Contracts</th>
</tr>
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</table>
| 2015 - 2014 | Title: Web Analytics for a Research University Library  
Granting Agency: **Penn State, University Library**  
Total Amount: $19,717  
Role: Principal Investigator |
| 2015 - 2013 | Title: Exploring Scholarly Discourse in MOOC Discussion Forums  
Granting Agency: **Penn State, Center for Online Innovation in Learning**  
Total Amount: $30,383  
Role: Principal Investigator |
| 2014 - 2010 | Title: Broadband to Support SMEs in Pennsylvania  
Granting Agency: **Commonwealth of Pennsylvania**  
Total Amount: $500,000  
Role: Faculty Investigator ($70,000) |
| 2014 - 2010 | Title: Semantic CiteSeerX  
Granting Agency: **National Science Foundation**  
Total Amount: $1,100,000  
Role: Principal Investigator ($130,000) |
| 2011 - 2008 | Title: Affective and Cognitive Factors Affecting the Evaluation of Search Engines by Users  
Granting Agency: **Google**  
Amount: $50,000  
Role: Principal Investigator |
| 2011 - 2009 | Title: Using Keyword Advertising for Economic and Workforce Development  
Granting Agency: **The Pennsylvania State University**  
Amount: $25,000  
Role: Principal Investigator |
| 2011 - 2010 | Title: Toolkits for Deployable Best Practices  
Granting Agency: **Office of Naval Research STTR Phase II**  
Total Amount: $750,000  
Role: Principal Investigator ($87,500) |
| 2011 - 2010 | Title: RAPID: Text Message-based Infrastructure for Emergency Response  
Granting Agency: **National Science Foundation**  
Total Amount: $75,000  
Role: Principal Investigator ($15,000) |
<table>
<thead>
<tr>
<th>Year</th>
<th>Title</th>
<th>Granting Agency</th>
<th>Amount</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009 - 2008</td>
<td>Title: Toolkits for Deployable Best Practices</td>
<td>Office of Naval Research STTR Phase I</td>
<td>$100,000</td>
<td>Principal Investigator ($15,000)</td>
</tr>
<tr>
<td>2009 - 2007</td>
<td>Title: REU Supplement for CRI: Collaborative: Next Generation CiteSeer</td>
<td>National Science Foundation</td>
<td>$12,000</td>
<td>Co-Principal Investigator ($12,000)</td>
</tr>
<tr>
<td>2009 - 2006</td>
<td>Title: Synchronized Interactions Among Users, Systems, and Information</td>
<td>Air Force Research Lab</td>
<td>$463,000</td>
<td>Principal Investigator ($463,000)</td>
</tr>
<tr>
<td>2008 - 2005</td>
<td>Title: The Next Generation CiteSeer</td>
<td>National Science Foundation</td>
<td>approximately $1,444,984</td>
<td>Co-principal Investigator with Dr. Lee Giles, Dr. Susan Gauch, and Dr. Jack Carroll ($48,701)</td>
</tr>
<tr>
<td>2009 - 2007</td>
<td>Title: Triggers in Collaborative Information Searching</td>
<td>National Science Foundation</td>
<td>$76,000</td>
<td>Co-principal Investigator with Dr. Madhu Reddy ($18,119)</td>
</tr>
<tr>
<td>2009 - 2008</td>
<td>Title: REU Supplement for Triggers in Collaborative Information Searching</td>
<td>National Science Foundation</td>
<td>$12,000</td>
<td>Co-principal Investigator with Dr. Madhu Reddy ($6,000)</td>
</tr>
<tr>
<td>2007 - 2006</td>
<td>Title: REU Supplement for CRI: Collaborative: Next Generation CiteSeer</td>
<td>National Science Foundation</td>
<td>$9,000</td>
<td>Co-Principal Investigator ($9,000)</td>
</tr>
<tr>
<td>2005 - 2004</td>
<td>Title: Design of Tools for Information Seeking, Management, and Analysis for a Lessons Learned Knowledge System</td>
<td>US Marine Corps Research University</td>
<td>$500,000</td>
<td>Co-Principal Investigator ($83,957)</td>
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</table>
**Funded Projects, Grants, Commissions, and Contracts**

<table>
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<tr>
<th>Year</th>
<th>Title</th>
<th>Granting Agency</th>
<th>Amount</th>
<th>Role</th>
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</thead>
<tbody>
<tr>
<td>2005</td>
<td>Knowledge Management</td>
<td><strong>US. Department of Defense, Defense Threat Reduction Agency (DTRA)</strong></td>
<td>$625,832</td>
<td>Co-Principal Investigator ($18,439).</td>
</tr>
<tr>
<td>2006 - 2005</td>
<td>REU Supplement for CRI: Collaborative: Next Generation CiteSeer</td>
<td><strong>National Science Foundation</strong></td>
<td>$6,000</td>
<td>Co-Principal Investigator ($6,000).</td>
</tr>
<tr>
<td>1998 -1996</td>
<td>The use of software agents in information retrieval.</td>
<td><strong>Army Research Laboratory</strong></td>
<td>$68,000</td>
<td>Principal Investigator ($68,000)</td>
</tr>
<tr>
<td>1998</td>
<td>Information Searching on Web Search Engines</td>
<td><strong>Army Research Laboratory</strong></td>
<td>$5,000</td>
<td>Principal Investigator ($5,000)</td>
</tr>
<tr>
<td>1997</td>
<td>Software agents for information retrieval.</td>
<td><strong>Army Research Laboratory</strong></td>
<td>$5,000</td>
<td>Principal Investigator ($5,000)</td>
</tr>
</tbody>
</table>

**Software Developed**

Software Development: Client-side Application for Automated Searching: that automates searching tactics via user implicit feedback.

Software Development: Application for Real-time Evaluation of Search Engine Performance: that automates the evaluation of Web search engines.

**Teaching**

At *The Pennsylvania State University* (current – 2002), I have taught a variety of information technology-related courses, including the undergraduate capstone project leadership course, the introductory freshman course, online marketing, graduate seminar course, and a graduate course on human information interaction. Additionally, I have mentored students in a variety of independent studies and have been on several course development committees.

At The Pennsylvania State University (current – 2002):
Teaching

- Committee Lead, curriculum development team for a college-level executive masters program.
- Committee Lead, curriculum development committee for re-design of the undergraduate senior – level capstone course.
- Committee Member, curriculum development team for re-design of the undergraduate freshmen level introductory course.
- Committee Member, curriculum development team for the establishment of a university-wide Business Analytics minor
- Faculty Lead, development team for the establishment of a university-wide professional library certification program
- Committee Member, curriculum development team for the establishment of a college Entrepreneurship minor
- Course Development: (1) undergraduate capstone course in IT project management, (2) graduate course in information searching, (3) undergraduate course in keyword advertising, (4) graduate course in web analytics, (5) undergraduate course in entrepreneurship technology

2015 – Mentor for one team in the Google Final 15 in The Google Online Marketing Challenge for 2014. The team was in the top fifteen from 4,000 teams from around the world (top 0.4%).

Mentor for team in the Google Non-profit Challenge for 2014. The teams were the top more than 4,000 teams from around the world (top 0.4%).

2014 – Mentor for three teams in the Global Final 15 in The Google Online Marketing Challenge for 2013. The teams were in the top fifteen from 4,000 teams from around the world (top 0.4%).

Mentor for two teams in the Google Media Marketing Challenge for 2013. The teams were the top more than 4,000 teams from around the world (top 0.4%).

2013 – Mentor for one team in the Global Final 15 in The Google Online Marketing Challenge for 2012. The team was in the top fifteen from more than 4,000 teams from around the world (top 0.4%).

2012 – Mentor for three teams in the Global Final 15 in The Google Online Marketing Challenge for 2011. The three teams were in the top fifteen from 4,000 teams from around the world (top 0.4%).

2010 – Mentor for two teams in the Global Final 15 in The Google Online Marketing Challenge for 2009. The two teams were in the top fifteen from 3,000+ teams from around the world (top 0.5%).

Had eight other teams get honorable mention by placing in the Top 100 Global Teams and five other teams place in the Top 10% of all teams.
**Teaching**

2010 – Mentor for two student teams that took 1st and 3rd in the *Penn State IdeaPitch Competition*, which is a university wide Penn State entrepreneurship competition.

2009 – Mentor for three teams in the *Global Final 15 in The Google Online Marketing Challenge* for 2009. The three teams were in the top fifteen from 2,107 teams from around the world.

  Had seven other teams get honorable mention by placing in the top 50 teams in the Americas region.

2009 - *Schreyer Honors College Teaching Grant* Recipient for developing multi-disciplinary keyword advertising, marketing, and technology course.

2008 – Mentor for the *winning team in the Americas region in The Google Online Marketing Challenge for 2008*. One of the top four teams from 1,620 teams from around the world. Won a trip to the GooglePlex with the students, plus the students all won laptops.

  Had two other teams get honorable mention by placing in the top 50 teams in the Americas region.

2008 – Selected as *Faculty Marshall* by Student Marshall of Computer Science and Engineering Department, College of Engineering, The Pennsylvania State University as faculty member who had the biggest impact on student’s academic career.

2008 – *Professor of the Year nominee* for College of Information Sciences and Technology, The Pennsylvania State University, 16802

2003 Selected as *Faculty Marshall* by Student Marshall of School of Information Sciences and Technology, The Pennsylvania State University as faculty member who had the biggest impact on student’s academic career


At the *University of Maryland* (Asian Division) (2000 – 1999), taught courses on Web/Internet and multimedia design.

At the *United States Military Academy* (1999 – 1996), I taught several computer science-related courses including introductory programming, advanced programming, micro-computing, and databases. Also, mentored students in a variety of independent studies.

  As executive officer for the department (1999 – mid 1997), was responsible for course scheduling, instructor assignments, classroom allocation, student counseling, as well as many other duties concerning the day-to-day operation of the department.
Membership on Degree Committees

The Pennsylvania State University
College of Information Sciences and Technology

Chair or Co-Chair
Partha Mukherjee (Committee Chair) (PhD degree expected in 2016)
Alex Brown (Committee Chair) (M.S. degree expected in 2016)
Zhe Liu (Committee Chair) (PhD degree conferred in 2014)
Dan Coughlin (Committee Chair) (PhD degree conferred in 2014)
Carolyn Hafernik (Committee Chair) (M.S. degree conferred in 2013)
Adan Ortiz-Cordova (Committee Chair) (M.S. degree conferred in 2013)
Jian-Syuan Wong (Committee Chair [until 2016]) (PhD degree expected in 2018)
Steve Carmen (Committee Chair [until 2013]) (M.S. degree conferred in 2013)
Kathleen Moore (Committee Chair [until 2012]) (PhD degree expected in 2015)
Mimi Zhang (Committee Chair) (PhD degree conferred in 2010)
Mike Hills (Committee Chair) (PhD degree conferred in 2010)
Hyun-Woo Kim (Committee Co-Chair) (M.S. degree conferred in 2010)
Young Shin Kim (Committee Co-Chair) (M.S. degree conferred in 2010)

Committee Member
Eric McMillan (Committee Member) (PhD degree expected in 2017)
Nathan McNeese (Committee Member) (PhD degree conferred in 2014)
Patricia Spence (Committee Member) (PhD degree conferred in 2013)
Arvind Karunakaran (Committee Member) (M.S. degree conferred in 2011)
Yusuf Raza (Committee Member) (M.S. degree conferred in 2009)
Sharoda Paul (Committee Member) (PhD degree conferred in 2009)
Allison Morgan (Committee Member) (PhD degree conferred in 2008)
Mithu Bhattacharya (Candidacy Committee Member, 2005)
Scott Robertson (Candidacy Committee Chair, 2004)

The Pennsylvania State University
Workforce Education and Development Program, College of Education
John Dolan (Committee Co-Chair [until 2012]) (PhD degree expected in 2013)

The Pennsylvania State University
School of Hospitality and Management
Lu Zhang (Committee Co-Chair) (M.S. degree conferred in 2009)

The Pennsylvania State University
Department of Industrial and Manufacturing Engineering
Himanshu Sharma (Committee Chair) (M.S. degree conferred in 2005)
Sourav Sengupta (Committee Chair) (M.S. degree conferred in 2005)
Ying Zhang (Committee Chair) (M.S. degree conferred in 2008)

The Pennsylvania State University
Department of Electrical Engineering
Vijay Mohan (Committee Co-Chair) (M.S. degree conferred in 2009)
Dheepak Ramaswamy (Committee Co-Chair) (M.S. degree conferred in 2009)
Ashish Kathuria (Committee Chair) (M.S. degree conferred in 2007)
Membership on Degree Committees

The Pennsylvania State University
  Department of Computer Science and Engineering
    Yanjun Gao (Committee co-Chair) (PhD degree expected in 2018)
    Chandrika Gopalakrishna (Committee Chair) (M.S. degree conferred in 2008)

The University of Pittsburgh
  School of Information Sciences
  Department of Library and Information Science
    Zhen Yue (Committee Member) (Ph.D. degree conferred in 2014)
    Minsoo Park (Committee Member) (Ph.D. degree conferred in 2008)

Rutgers, the State University of New Jersey
  School of Communication, Information and Library Studies
    Yueling Lee (Committee Member) (Ph.D. degree conferred in 2008)

The Pennsylvania State University
  Schreyer Honors College, thesis advising
    Megan Krause (B.S. degree expected 2017)
    Allie Whitman (B.S. degree expected 2016)
    Adan Ortiz-Cordova (B.S. degree conferred 2011)
    Bradley Shively (B.S. degree conferred 2010)
    Kate Sobel (B.S. degree conferred 2010)
    Steven Troxell (B.S. degree conferred in 2008)
    Steven Clancy (B.S. degree conferred in 2007)
    Paulo Molina (B.S. degree conferred in 2004)
    Chris Catalano (B.S. degree conferred in 2004)
    Andy Shingle (B.S. degree conferred in 2004)

Supervision of Other Undergraduate Research

<table>
<thead>
<tr>
<th>Student</th>
<th>Degree</th>
<th>Major</th>
<th>University</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arielle Amchin</td>
<td>BS</td>
<td>Marketing</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Arun Das</td>
<td>BS</td>
<td>CS</td>
<td>Brown University</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Manisha Daredry</td>
<td>BS</td>
<td>MIS</td>
<td>Carnegie Mellon Qatar</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Satyajit Narayanan</td>
<td>BS</td>
<td>CS</td>
<td>Bharati Vidyapeeth University</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Will Berkheiser</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Pat Bonner</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Danielle Booth</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Anna Brown</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Nicole Butera</td>
<td>BS</td>
<td>Chemistry</td>
<td>Penn State</td>
<td>Women in Science and Engineering Research</td>
</tr>
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</table>

[http://studentaid.psu.edu/types-of-aid/work-study-and-employment/work-study/about]
### Supervision of Other Undergraduate Research

<table>
<thead>
<tr>
<th>Student</th>
<th>Degree</th>
<th>Major</th>
<th>University</th>
<th>Role</th>
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<tbody>
<tr>
<td>Chris Ciamacca</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>(WISER) Mentor</td>
</tr>
<tr>
<td>Karen Lee</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>Research Mentor</td>
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<tr>
<td>Dana Kracow</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Daehhee Park</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Melissa Reizner</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Mitchell Rukat</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Paul Rinaldi</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Simone Schuster</td>
<td>BS</td>
<td>Advertising</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Laura Solomon</td>
<td>BS</td>
<td>Advertising</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Meng Ting Sun</td>
<td>BS</td>
<td>Accounting</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Pete Smith</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
<tr>
<td>Megan Tan</td>
<td>BS</td>
<td>Marketing</td>
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<td>Research Mentor</td>
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<tr>
<td>Courtney Weaver</td>
<td>BS</td>
<td>IST</td>
<td>Penn State</td>
<td>Research Mentor</td>
</tr>
</tbody>
</table>

### Professional Service

#### Editorial Boards

| Current – 2016 | Editorial Board Member, *Information Discovery and Delivery* |
| Current – 2012 | Editorial Advisory Board Member, *Social Networks* |
| Current – 2011 | Editorial Advisory Board Member, *International Journal of Electronic Business* |
| Current – 2009 | Editorial Advisory Board Member, *Journal of the American Society for Information Science and Technology* |
| Current – 2009 | Editorial Advisory Board Member, *Future Internet* |
| Current – 2006 | Editorial Advisory Board Member, *Information Research* |
| Current – 2004 | Editorial Advisory Board Member, *Information Processing & Management* |
| 2016 – 2011    | Editor-in-chief, *Internet Research* (Emerald) |
| 2011 - 2004    | Editorial Advisory Board Member, *Journal of Internet Research* |
Professional Service

Editorial Boards

2010 - 2004  Editorial Advisory Board Member, *Library and Information Science Journal*

2008 - 2004  Associate Editor (Book Reviews), *Information Processing & Management*


Professional Service

Tenure Letters

2016  External Tenure Letter Writer for faculty member of School of Business, McMaster University

2016  External Tenure Letter Writer for faculty member of Department of Library and Information Science, The Catholic University of America

2015  External Tenure Letter Writer for faculty member of School of Communication and Information, Rutgers University

2013  External Tenure Letter Writer for faculty member of College of Information Science and Technology, Drexel University

2013  External Tenure Letter Writer for faculty member of Graduate School of Management, University of Haifa

2012  External Tenure Letter Writer for faculty member of Faculty of Social Sciences, Bar-Ilan University

2012  External Tenure Letter Writer for faculty member of Henry B. Tippie College of Business, The University of Iowa

2012  External Tenure Letter Writer for faculty member of School of Business, North Carolina Central University

2010  External Tenure Letter Writer for faculty member of School of Business Administration, Bar Ilan University, Israel

2009  External Tenure Letter Writer for faculty member of Computer Information Systems Department, Bentley University
**Professional Service**

**Ad hoc Reviewing**

<table>
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<th>Year</th>
<th>Role and Journals</th>
</tr>
</thead>
</table>

**Reviewer Award**

<table>
<thead>
<tr>
<th>Year</th>
<th>Role</th>
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<tbody>
<tr>
<td>2010</td>
<td>Reviewer, Internet Research</td>
</tr>
</tbody>
</table>
Professional Service

Ad hoc Reviewing

2007  Reviewer, Simulation Modelling Practice and Theory, ACM Transactions on Information Systems


2005  Reviewer, Journal of Medical Internet Research, ACM Transactions on Information Systems


1999  Reviewer, Information Processing & Management

1998  Reviewer, Computer Science Education Journal, Information Processing & Management

Professional Service

Grant Reviewing
2015  Reviewer, Qatar Research Program, Qatar Foundation

2014  Reviewer, grant panelist for National Science Foundation, CISE Research Infrastructure (CRI) program February 2014.

2013  Reviewer for grant proposal for Reviewer, American Association for the Advancement of Science (AAAS) Research Competitiveness Program Grant Proposal for funding through the Maine Technology Institute's Development Awards

2012  Reviewer, Army Research Lab Grant Proposal
### Professional Service

#### Grant Reviewing

<table>
<thead>
<tr>
<th>Year</th>
<th>Role</th>
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<tbody>
<tr>
<td>2011</td>
<td>Reviewer, National Science Foundation Grant Proposal</td>
</tr>
<tr>
<td>2011</td>
<td>Reviewer, American Association for the Advancement of Science (AAAS) Research Competitiveness Program Grant Proposal for funding through the Maine Technology Institute's Development Awards</td>
</tr>
<tr>
<td>2010</td>
<td>Reviewer, Standard Research Grants program of the Social Sciences and Humanities Research Council of Canada (SSHRC) Grant Proposal</td>
</tr>
<tr>
<td>2010</td>
<td>Reviewer for grant proposal for Reviewer, American Association for the Advancement of Science (AAAS) Research Competitiveness Program Grant Proposal for funding through the Maine Technology Institute's Development Awards</td>
</tr>
<tr>
<td>2008</td>
<td>Reviewer, Israel Science Foundation Grant Proposal</td>
</tr>
<tr>
<td>2007</td>
<td>Reviewer, Air Force Office of Scientific Research Grant Proposal</td>
</tr>
<tr>
<td>2007</td>
<td>Reviewer, Israel Science Foundation Grant Proposal</td>
</tr>
<tr>
<td>2004</td>
<td>Grant Reviewer, Arts and Humanities Research Board Grant Proposal, Whitefairs, Lewins Mead, Bristol, UK, BS1 2AE</td>
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#### Other

<table>
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<tr>
<th>Year</th>
<th>Description</th>
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<tbody>
<tr>
<td>2016</td>
<td>Special Issue on Computational Advertising, IEEE Intelligent Systems. Guest Editors: Yanwu Yang, Huazhong University of Science and Technology, China; Yinghui Yang, University of California, Davis, US; Bernard J. Jansen, Qatar Computing Research Institute, HBKU; Mounia Lalmas, Yahoo Labs, UK.</td>
</tr>
<tr>
<td>2016 – 2007</td>
<td>Academic Panelist for The Google Online Marketing Challenge (<a href="http://www.google.com/onlinechallenge/">http://www.google.com/onlinechallenge/</a>). Based on registrations from more than 100 countries and more than 11,000 student teams, the Challenge may be the largest, worldwide educational course ever done.</td>
</tr>
<tr>
<td>2015</td>
<td>External Examiner for Spanish PhD thesis (Universitat Pompeu Fabra Barcelona)</td>
</tr>
<tr>
<td>2014 – 2013</td>
<td>Faculty Advisor for the Penn State Digital Marketing Association</td>
</tr>
<tr>
<td>2012</td>
<td>External Examiner for Australian PhD thesis (Queensland University of Technology)</td>
</tr>
<tr>
<td>2012 - 2011</td>
<td>Member, Research Committee, Search Engine Marketing Professional Organization (SEMO)</td>
</tr>
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### Professional Service

#### Other

<table>
<thead>
<tr>
<th>Year</th>
<th>Activity</th>
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<tr>
<td>2011 – 2009</td>
<td>Chair of the American Society for Information Science and Technology (ASIST) Information Science Education Committee</td>
</tr>
<tr>
<td>2010</td>
<td>Reviewer, Cambridge University Press book proposal</td>
</tr>
<tr>
<td>2010</td>
<td>Reviewer, Cambridge University Press book proposal</td>
</tr>
<tr>
<td>2010</td>
<td>External Examiner for Australian PhD thesis (University of Sydney)</td>
</tr>
<tr>
<td>2009 – 2006</td>
<td>Chair of the American Society for Information Science and Technology (ASIST) Information Science Education Committee Dissertation Jury</td>
</tr>
<tr>
<td>2008</td>
<td>External Examiner for Australian PhD thesis (The University of New South Wales)</td>
</tr>
<tr>
<td>2008</td>
<td>External Examiner for Australian PhD thesis (The University of New South Wales)</td>
</tr>
<tr>
<td>2008</td>
<td>Guest Editor, <em>International Journal of Electronic Business (IJEB)</em>. Special Issue on Sponsored Search</td>
</tr>
<tr>
<td>2007</td>
<td>External Examiner for Australian PhD thesis (Monash University)</td>
</tr>
<tr>
<td>2007</td>
<td>Guest Editor, with Andy Edmond, Kirstie Hawkey, Melanie Kellar, and Don Turnbull. <em>Journal of Web Engineering</em>. Special Issue on Logging Traces of Web Activity</td>
</tr>
<tr>
<td>1995 -1994</td>
<td>President, Computer Science Graduate Students Association, Texas A&amp;M University, College Station, Texas.</td>
</tr>
</tbody>
</table>

#### Conference Activities

<table>
<thead>
<tr>
<th>Year</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td>Chair, Program Committee, The Third International Workshop on Social Networks Analysis, Management and Security (SNAAMS - 2016), The 4th International Conference on Future Internet of Things and Cloud (FiCloud-2016), Vienna, Austria. 22-24 August.</td>
</tr>
</tbody>
</table>
### Professional Service

#### Conference Activities

**2015**  
Program Committee, 7th International Joint Conference on Knowledge Discovery, Knowledge Engineering and Knowledge Management, Lisbon, Portugal. 12-14 Nov.  
Meta-Reviewer, Papers and Posters, 78th Annual Meeting of the American Society for Information Science and Technology (ASIST 2015). St. Louis, Mo. 6-10 November.  
Reviewer, Papers and Posters, 77th Annual Meeting of the American Society for Information Science and Technology (ASIST 2014). Montreal, Canada. 31 October - 4 November.  
Reviewer, Papers, 76th Annual Meeting of the American Society for Information Science and Technology (ASIST 2013). Montreal, Canada. 1-6 November.  
Reviewer, Posters, 76th Annual Meeting of the American Society for Information Science and Technology (ASIST 2013). Montreal, Canada. 1-6 November.  
Program Committee: European Conference on Information Retrieval (ECIR 2013) Workshop on Group Membership and Search (GRUMPS), 24 March, Moscow, Russia.  
Program Committee: Sixth ACM WSDM Conference on Web Search and Data Mining Workshop on Web Search Click Data, 4-8 February, Rome, Italy.  
Session Track Chair, 74th Annual Meeting of the American Society for Information Science and Technology (ASIST 2011). 9-13 October. New Orleans, LA.  
Program Committee, iConference. Toronto, Canada, 7-10 February.  
Program Committee: 33rd European Conference on Information Retrieval (ECIR 2011), Best Paper Committee, Dublin, Ireland, 19-21 April 2011
### Professional Service

#### Conference Activities


**2010** Program Committee: LREC 2010 Workshop on Web Logs and Question Answering (WLQA2010). Malta, 22 May.


**2009** Program Committee: Web Information and Data Management. 19th International Conference on Information and Knowledge Management (CIKM 2009). Hong Kong. 6 November.


**2009** Program Committee: Qualitative and Quantitative Methods in Libraries International Conference (QQML2009). Chania, Crete, Greece, 26-29 May.


**Professional Service**

**Conference Activities**


2008  Reviewer, Southern Association for Information Systems Conference (SAIC 2008), Richmond, VA, USA 13–15 March.


2007  Program Committee, 8th World Congress on the Management of eBusiness. Toronto, Canada. 11-13 July.


### Professional Service

#### Conference Activities

<table>
<thead>
<tr>
<th>Year</th>
<th>Activity</th>
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</thead>
<tbody>
<tr>
<td>2006</td>
<td>Program Committee: the 5th International Conference on Conceptions of Library and Information Science, Glasgow, Scotland, 6-9 June 2005.</td>
</tr>
<tr>
<td>2006</td>
<td>Session Track Co-chair, Web Searching Sessions (Three tracks), the IEEE 5th International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 4-6 April 2005.</td>
</tr>
<tr>
<td>2005</td>
<td>Program Committee, the 5th International Conference on Conceptions of Library and Information Science, Glasgow, Scotland, 6-9 June 2005.</td>
</tr>
<tr>
<td>2004</td>
<td>Session Track Co-chair, Web Searching Sessions (Three tracks), the IEEE 5th International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 5-7 April, 2004.</td>
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</table>
### Professional Service

#### Conference Activities

1998  Reviewer, New Engineering Educators Conference

1998  Reviewer, American Society for Engineering Education National Conference


### Advisory Boards

<table>
<thead>
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<th>Year</th>
<th>Board</th>
<th>Website</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current - 2012</td>
<td>CLAK Impressions <a href="http://www.linkedin.com/company/clak-impressions">http://www.linkedin.com/company/clak-impressions</a></td>
<td></td>
</tr>
<tr>
<td>Current - 2010</td>
<td>The Pennsylvania Technical Assistance Program (PennTAP), <a href="http://penntap.psu.edu/action-council/">http://penntap.psu.edu/action-council/</a></td>
<td></td>
</tr>
<tr>
<td>2012 - 2010</td>
<td>Chief Marketing Officer (CMO Council) Advisory Board for research initiative, Localize to Optimize Sales Channel Effectiveness</td>
<td></td>
</tr>
<tr>
<td>2012 - 2010</td>
<td>Jabbit Board of Advisors, <a href="http://www.jabbit.com/">http://www.jabbit.com/</a></td>
<td></td>
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</table>

### Invited Talks (Selected)

#### Keynote

  http://jimjansen.blogspot.qa/2016/07/keynote-speaker-at-2016-sixth-national.html

- Keynote, The 7th International IEEE on Information and Communication Systems (ICICS 2016), 5-7 April, Irbid, Jordan.

  http://jimjansen.blogspot.qa/2015/12/imcom-2016-keynote-transformed-role-of.html

- Presentation, Sungkyunkwan University (Sowan Campus), 23 April 2015, Seoul, South Korea.  
  http://jimjansen.blogspot.com/2015/04/visit-to-department-of-interaction.html

- Presentation, National Research University Higher School of Economics, 10 March 2014, St. Petersburg, Russia  
  http://jimjansen.blogspot.com/2014/03/presentation-at-national-research.html
Invited Talks (Selected)


Presentation, Sungkyunkwan University (Sowan Campus), 20-21 June 2013, Seoul, South Korea. http://jimjansen.blogspot.com/2013/06/research-workshop-discussion-on-web.html


Presentation, Library and Information Science Department, College of Liberal Arts, Sungkyunkwan University, 18 June 2013, Seoul, South Korea. http://jimjansen.blogspot.com/2013/06/keyword-advertising-research.html

Presentation, Qatar Computer Research Institute, 24-29 April 2013, Doha, Qatar. http://jimjansen.blogspot.com/2013/04/research-presentation-to-folks-at-qatar.html

Presentation, Department of Decision Sciences, College of Business and Public Administration, Old Dominion University, 14-15 April 2013, Norfolk, VA. http://jimjansen.blogspot.com/2013/04/keyword-advertising-presentation-to.html


Keynote


Keynote


Invited Talks (Selected)


Presentation, School of Communication and Information, Rutgers University. 8 November 2010, New Brunswick, NJ.

University-wide Presentation, Ryerson University, 18 October 2009, Toronto, Canada.


Presentation, School of Communication and Information, Rutgers University. 2 September 2005, New Brunswick, NJ.

Presentation, College of Information, University of North Texas, 15 June 1998. Denton, TX

Membership in Professional Societies

American Society for Information Science and Technology (ASIST)

Armed Forces Communications and Electronics Association (AFCEA)

Association for Computing Machinery (ACM)

The Institute of Electrical and Electronics Engineers (IEEE)

Societies: Computer Society
Professional Experience

Numerous consulting projects and expert witnessing (class action suits, patent litigation, and civil litigation)

US Army Officer (2002 – 1985): Held various command and staff positions of progressively increasing responsibility. Responsible for vision articulation, planning, directing, and day-to-day management of organizations ranging in size from 10 to over 200 personnel. Served in numerous locations in the United States, Europe, Central America, and the Far East as a communication officer. Responsible for the planning and installation of various types of communication systems including radio, telephone, computer and other digital networks. Served with the 8th U.S. Army Y2K Operational Evaluation Team validating critical information management systems. Responsible for the long term planning, developing, and budgeting of communication systems of all types for the U.S. Forces stationed on the Korean Peninsula. Responsible for a 22-person division that develops photographic, graphical, audio-visual and multimedia material for the U.S. Army War College.

Security Clearance

### Appendix B Testimony Cases

<table>
<thead>
<tr>
<th>Year</th>
<th>Deliverables</th>
<th>Retained by</th>
<th>Case</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td>Testimony, Deposition</td>
<td>Plaintiff</td>
<td>ERIN ANDREWS, Plaintiff, vs MARRIOTT INTERNATIONAL, INC., a Delaware Corporation; WESTEND HOTEL PARTNERS, LLC dba NASHVILLE MARRIOTT AT VANDERBILT UNIVERSITY, a Delaware Limited Liability Company, and MICHAEL DAVID BARRETT, an individual, Defendants. CASE NO. 11C4831, which is pending in the Circuit Court for Davidson County Tennessee at Nashville. Law Firm: Greene Broillet &amp; Wheeler LLP</td>
</tr>
<tr>
<td>2015</td>
<td>Deposition</td>
<td>Plaintiff</td>
<td>ENCORE MEDIA METRICS, LLC fka SPUR DIGITAL L.P., dba SPUR INTERACTIVE and STEVE LATHAM VS ADOMETRY, INC. fka CLICK FORENSICS, INC. Cause 2012-44351 / Court: 281. (The District Court of Travis County, Texas.) Law Firm: Watts &amp; Guerra LLP and DiNovo Price Ellwanger &amp; Hardy LLP</td>
</tr>
<tr>
<td>2014</td>
<td>Deposition</td>
<td>Defendant</td>
<td>M.B. AS NEXT FRIEND OF J.B., A MINOR Plaintiffs, V. CAMP STEWART FOR BOYS, INC., AMERICAN INSTITUTE FOR FOREIGN STUDY, INC. D/B/A CAMP AMERICA, AND SCOTT ASH JAMES ZIRUS Defendant. NO. 5:12-CV-1133 (Western District of Texas) Law Firm: Rymer, Moore, Jackson, &amp; Echols PC</td>
</tr>
<tr>
<td>2014</td>
<td>Testimony, Deposition</td>
<td>Defendant</td>
<td>REAL LOCAL PAGE PARTNERS, LLC, Claimant, v. PAYMENT ALLIANCE INTERNATIONAL, INC., Respondent &amp; PAYMENT ALLIANCE INTERNATIONAL, INC. Counter-Claimant, v. REAL LOCAL PAGE PARTNERS, LLC, Counter-Respondent. CASE NO. 32 147 Y 0021413. AMERICAN ARBITRATION ASSOCIATION, MIAMI, FLORIDA Law Firm: Kirkland &amp; Ellis LLP</td>
</tr>
</tbody>
</table>
Appendix C Documents Referenced

Web Services
- Alexa www.alexa.com/
- Bing Search Engine https://www.bing.com/
- Compete https://www.compete.com/
- Google Keyword Tool https://adwords.google.com/KeywordPlanner
- Google Search Engine www.google.com/
- Google Trends https://www.google.com/trends/
- Microsoft Bing Keyword Tool www.bing.com/toolbox/keywords
- Million Short https://millionshort.com/
- SimilarWeb www.similarweb.com/
- SpyFu www.spyfu.com/
- W3Snoop http://www.w3snoop.com/

Documents
- Complaint, VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. CASE NO. 1:15-cv-07433
- GIUFFRE001120
- GM_00068 (Gow E-Mail)
- http://www.pewresearch.org/fact-tank/2014/02/03/6-new-facts-about-facebook/
- https://www.google.com/advanced_search
- Mail Online https://en.wikipedia.org/wiki/Mail_Online
- Snowball sampling https://en.wikipedia.org/wiki/Snowball_sampling
• The Independent https://en.wikipedia.org/wiki/The_Independent
• The Times https://en.wikipedia.org/wiki/The_Times
• Triangulation (social science) http://en.wikipedia.org/wiki/Triangulation_%28social_science%29
• www.theguardian.com/media/2016/mar/17/independent-mirror-express-and-star-suffer-sharp-fall-in-traffic
EXHIBIT 25
(Filed Under Seal)
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE.

Plaintiff,

v.

GHISLAINE MAXWELL

Defendants

15-cv-07433-RWS

EXPERT REPORT

OF

PETER KENT

OCTOBER 28TH, 2016
32. However, nowhere in his report does Mr. Anderson explain why these 26 search terms are important, beyond the fact that, he claims incorrectly, searching the major search engines with these phrases results in links to Web pages that contain allegedly defamatory material. However, this is true of literally thousands of different search phrases—it’s a simple task to create search terms to match particular pages—but he never explains why these particular 26 phrases are relevant.

33. As I explain below in detail, Mr. Anderson’s testimony is unreliable because it is not based on sufficient facts or data, nor is it the product of reliable principles and methods. Rather, it is seriously flawed in a number of ways.

1. **Mr. Anderson’s Choice of Search Terms Is Arbitrary**

34. Mr. Anderson, in his report, provides a list of 26 search terms (Page 7) that appear to have been chosen in an arbitrary manner; furthermore, Mr. Anderson does not explain how these search terms are relevant to this case. Most of the examples are rarely if ever searched upon, and return few, if any, relevant results (that is, links to pages that discuss or recount Defendant’s alleged defamatory statements).

35. Search terms are only relevant to this case if a searcher, wishing to find information about Plaintiff, would type the terms into a search engine. Mr. Anderson does not explain why such a person would type, for instance, the term *victims refuse silence sex slave*; in fact there seems no reason to believe that such a person would use this term. Why would someone wanting to research information about Plaintiff use the term *virginia roberts lies,* or *virginia roberts ross gow?* Mr. Anderson does not suggest any reason that somebody should use such terms. Indeed, these are terms unlikely to be used by anyone unfamiliar with this litigation or the fact that Defendant had denied Plaintiff’s original allegations. These are not terms likely to be used by Mr. Anderson’s “casual searcher” (“I conducted an investigation to determine the
106. However, this 3-step process (create pages, place them on Web sites, create links to the pages) is not very efficient, regardless of the fact that it is common in the ORM business. One should keep in mind that the primary goal of any business is maximizing profits, not efficiency. The 3-step process may be inefficient, but it has the advantage of increasing the income of ORM firms; rather than merely creating links, they can also charge for the creation and placement of Web pages. There is, however, an alternative strategy that some ORM firms in fact do use, as I describe later in this report.

2. The Problems With Mr. Anderson’s Strategy

107. Mr. Anderson’s strategy is unnecessarily expensive and complicated, for a number of reasons:

- Mr. Anderson exaggerates the number of Web pages (780) that must be pushed down in the search results
- Placing new Web pages on quality Web sites will be very difficult, and unnecessary
- Pushing the new Web pages up in the search results will be very difficult

a) Mr. Anderson Exaggerates the Number of Web Pages (780) That Must Be Pushed Down In The Search Results

108. Mr. Anderson has stated that 780 Web pages must be pushed down in the search results; he takes his 26 search phrases, and multiplies by 30 results (in theory 10 results per search-result page, over three pages, in order to push the “offending” pages down to the fourth page, though in some cases, in particular on Google, there may actually be fewer results on the first page, perhaps 8 or 9.) This is wrong for various reasons.

Most of the Search Terms Will be Used Infrequently If Ever

109. As noted earlier, most of Mr. Anderson’s 26 search terms are infrequently if ever employed by searchers. Why, for instance, would it be necessary to push down offending Web pages in the results that the search engines provide for the term victims refuse silence sex slave, when this term is likely never used (and furthermore, that the search results contain no

EXHIBIT 26
(Filed Under Seal)
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
EXHIBIT 27
(Filed Under Seal)
## A07. ASSIGNMENT HISTORY

**PANEL:** __

**STDT:** ROBERTS, VIRGINIA L

**SCHL:** 3390  **GR:** 10  **ST:** I  

<table>
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<th>WITHDRAWAL</th>
<th>E</th>
<th>C</th>
<th>CD</th>
<th>DATE</th>
<th>OD</th>
<th>CD</th>
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<td>99 01</td>
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<tr>
<td>E01 082592</td>
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<td>1901 LOXAHATCHEE EL</td>
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</tr>
</tbody>
</table>

**TERML:** ILB5

---

**Date:** 5/23/2016  **Time:** 9:05:36 AM  

**GM_00888**
**Important Message**

**For:** J. E.

**Date:** 2/27/05  
**Time:** 10:18 A.M.

**Of:** Ms. Maxwell

<table>
<thead>
<tr>
<th>Telephoned</th>
<th>Please Call</th>
</tr>
</thead>
<tbody>
<tr>
<td>Came To See You</td>
<td>Will Call Again</td>
</tr>
<tr>
<td>Wants To See You</td>
<td>Rush</td>
</tr>
<tr>
<td>Returned Your Call</td>
<td>Special Attention</td>
</tr>
</tbody>
</table>

**Message:** She is home

**Signed:** J.

---

**Important Message**

**For:** J. E.

**Date:** 2/28/05  
**Time:** 4:40 A.M.

**Of:** Jean Luc

<table>
<thead>
<tr>
<th>Telephoned</th>
<th>Please Call</th>
</tr>
</thead>
<tbody>
<tr>
<td>Came To See You</td>
<td>Will Call Again</td>
</tr>
<tr>
<td>Wants To See You</td>
<td>Rush</td>
</tr>
<tr>
<td>Returned Your Call</td>
<td>Special Attention</td>
</tr>
</tbody>
</table>

**Message:** Please!

Call him

**Signed:** J.

---

**Important Message**

**For:** Jeffery

**Date:** 2/28/05  
**Time:** 12:32 P.M.

**Of:**

<table>
<thead>
<tr>
<th>Telephoned</th>
<th>Please Call</th>
</tr>
</thead>
<tbody>
<tr>
<td>Came To See You</td>
<td>Will Call Again</td>
</tr>
<tr>
<td>Wants To See You</td>
<td>Rush</td>
</tr>
<tr>
<td>Returned Your Call</td>
<td>Special Attention</td>
</tr>
</tbody>
</table>

**Message:** She is 1.0 down

If 2:30 no she needs to stay in school

**Signed:**

---

**Important Message**

**For:** Jeffery

**Date:** 2/28/05  
**Time:** 3:45 P.M.

**Of:** Jean Luc

<table>
<thead>
<tr>
<th>Telephoned</th>
<th>Please Call</th>
</tr>
</thead>
<tbody>
<tr>
<td>Came To See You</td>
<td>Will Call Again</td>
</tr>
<tr>
<td>Wants To See You</td>
<td>Rush</td>
</tr>
<tr>
<td>Returned Your Call</td>
<td>Special Attention</td>
</tr>
</tbody>
</table>

**Message:** That he called back

**Signed:**

SAO01067
### Case 1

- **For:** J. E.
- **Date:** 9/4/05
- **Time:** 3:40 PM

<table>
<thead>
<tr>
<th>Telephoned</th>
<th>Please Call</th>
</tr>
</thead>
<tbody>
<tr>
<td>Came to See You</td>
<td>Will Call Again</td>
</tr>
<tr>
<td>Wants to See You</td>
<td>Rush</td>
</tr>
<tr>
<td>Returned Your Call</td>
<td>Special Attention</td>
</tr>
</tbody>
</table>

**Message:**
She will be home at 3 pm with someone.

**Signed:** J.

### Case 2

- **For:** Ms. B. Maxwell
- **Date:** 9/4/05
- **Time:** 1:40 PM

<table>
<thead>
<tr>
<th>Telephoned</th>
<th>Please Call</th>
</tr>
</thead>
<tbody>
<tr>
<td>Came to See You</td>
<td>Will Call Again</td>
</tr>
<tr>
<td>Wants to See You</td>
<td>Rush</td>
</tr>
<tr>
<td>Returned Your Call</td>
<td>Special Attention</td>
</tr>
</tbody>
</table>

**Message:**

**Signed:** L.

### Case 3

- **For:** J. E.
- **Date:** 3/4/05
- **Time:** 3:25 PM

<table>
<thead>
<tr>
<th>Telephoned</th>
<th>Please Call</th>
</tr>
</thead>
<tbody>
<tr>
<td>Came to See You</td>
<td>Will Call Again</td>
</tr>
<tr>
<td>Wants to See You</td>
<td>Rush</td>
</tr>
<tr>
<td>Returned Your Call</td>
<td>Special Attention</td>
</tr>
</tbody>
</table>

**Message:**
Canceled. She would like to speak to you. I believe about college. Should I schedule any one else?

**Signed:** J.

### Case 4

- **For:** Mr. J. Epstein
- **Date:** 9/4/05
- **Time:** 2:08 PM

<table>
<thead>
<tr>
<th>Telephoned</th>
<th>Please Call</th>
</tr>
</thead>
<tbody>
<tr>
<td>Came to See You</td>
<td>Will Call Again</td>
</tr>
<tr>
<td>Wants to See You</td>
<td>Rush</td>
</tr>
<tr>
<td>Returned Your Call</td>
<td>Special Attention</td>
</tr>
</tbody>
</table>

**Message:**

**Signed:** L.

SAO01089
### Case 18-2868, Document 283, 08/09/2019, 2628241, Page 504 of 883

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Message</th>
</tr>
</thead>
<tbody>
<tr>
<td>9/10/05</td>
<td>5:40 PM</td>
<td>I went to Sarah's house and made her water bottle and I went to work out with @.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SIGNED: J.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Message</th>
</tr>
</thead>
<tbody>
<tr>
<td>9/10/05</td>
<td>5:55 PM</td>
<td>She got messages, she talked with @.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SIGNED: J.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Message</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>The UNFINISHED LIFE is not playing yet.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>I got tickets for the Broken Flowers</td>
</tr>
<tr>
<td></td>
<td></td>
<td>@ 9:30</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SIGNED: J.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Message</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>She will be at 12:30</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SIGNED: J.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Message</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>He asked for the call</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Review the report, go to the third floor.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>It takes several days to drop...</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SA001092</td>
</tr>
</tbody>
</table>
**Case 18-2868, Document 283, 08/09/2019, 2628241, Page505 of 883**

<table>
<thead>
<tr>
<th>IMPORTANT MESSAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>FOR J. E.</td>
</tr>
<tr>
<td>DATE 9/11/05</td>
</tr>
<tr>
<td>TIME 9:15 A.M.</td>
</tr>
<tr>
<td>M.</td>
</tr>
<tr>
<td>OF PHONE/ MOBILE</td>
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</table>

<table>
<thead>
<tr>
<th>TELEPHONED</th>
<th>PLEASE CALL</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAME TO SEE YOU</td>
<td>WILL CALL AGAIN</td>
</tr>
<tr>
<td>WANTS TO SEE YOU</td>
<td>RUSH</td>
</tr>
<tr>
<td>RETURNED YOUR CALL</td>
<td>SPECIAL ATTENTION</td>
</tr>
</tbody>
</table>

**MESSAGE**

I got a car for...

**SIGNED J.**

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<table>
<thead>
<tr>
<th>IMPORTANT MESSAGE</th>
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</thead>
<tbody>
<tr>
<td>FOR J. E.</td>
</tr>
<tr>
<td>DATE 9/11/05</td>
</tr>
<tr>
<td>TIME 10:10 A.M.</td>
</tr>
<tr>
<td>M.</td>
</tr>
<tr>
<td>OF PHONE/ MOBILE</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>TELEPHONED</th>
<th>PLEASE CALL</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAME TO SEE YOU</td>
<td>WILL CALL AGAIN</td>
</tr>
<tr>
<td>WANTS TO SEE YOU</td>
<td>RUSH</td>
</tr>
<tr>
<td>RETURNED YOUR CALL</td>
<td>SPECIAL ATTENTION</td>
</tr>
</tbody>
</table>

**MESSAGE**

hasn't continued by 11:00 yet so she is keeping on hold in case doesn't call back

**SIGNED J.**

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<table>
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<th>IMPORTANT MESSAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>FOR Mr. J. Epstein</td>
</tr>
<tr>
<td>DATE 9/11/05</td>
</tr>
<tr>
<td>TIME 10:00 A.M.</td>
</tr>
<tr>
<td>M. George Holdsmith</td>
</tr>
<tr>
<td>OF PHONE/ MOBILE</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TELEPHONED</th>
<th>PLEASE CALL</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAME TO SEE YOU</td>
<td>WILL CALL AGAIN</td>
</tr>
<tr>
<td>WANTS TO SEE YOU</td>
<td>RUSH</td>
</tr>
<tr>
<td>RETURNED YOUR CALL</td>
<td>SPECIAL ATTENTION</td>
</tr>
</tbody>
</table>

**MESSAGE**

will be at 11:45

Do you want me to cancel

**SIGNED L.**

---

**SAO01093**

**SIGNED J.**
**Case 18-2868, Document 283, 08/09/2019, 2628241, Page506 of 883**

**IMPORTANT MESSAGE**
FOR: J.E.
DATE: 2/27/05 TIME: 10:18 A.M.
M.
OF: Ms. Maxwell
PHONE/ MOBILE: 
TELEPHONED: 
RETRUNED YOUR CALL: SPECIAL ATTENTION
CAME TO SEE YOU: WILL CALL AGAIN
WANTS TO SEE YOU: RUSH
MESSAGE: She is home
SIGNED: J.

**IMPORTANT MESSAGE**
FOR: J.E.
DATE: 2/26/05 TIME: 4:40 P.M.
M.
OF: Geon Luc
PHONE/ MOBILE: no phone
TELEPHONED: 
RETRUNED YOUR CALL: SPECIAL ATTENTION
CAME TO SEE YOU: WILL CALL AGAIN
WANTS TO SEE YOU: RUSH
MESSAGE: Please call him
SIGNED: J.

**IMPORTANT MESSAGE**
FOR: Jeff, us
DATE: 2/28/05 TIME: 12:32 P.M.
M.
OF: 
PHONE/ MOBILE: 
TELEPHONED: 
RETRUNED YOUR CALL: SPECIAL ATTENTION
CAME TO SEE YOU: WILL CALL AGAIN
WANTS TO SEE YOU: RUSH
MESSAGE: She is down with flu 2:30 is ok we see words can stay in schooL
SIGNED: 

**IMPORTANT MESSAGE**
FOR: Jeff, us
DATE: 2/28/05 TIME: 7:41 P.M.
M.
OF: 
PHONE/ MOBILE: 
TELEPHONED: J.
RETRUNED YOUR CALL: SPECIAL ATTENTION
CAME TO SEE YOU: WILL CALL AGAIN
WANTS TO SEE YOU: RUSH
MESSAGE: But he called back
SIGNED: 

SAO01446
Case 18-2868, Document 283, 08/09/2019, 2628241, Page507 of 883
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Case 18-2868, Document 283, 08/09/2019, 2628241, Page509 of 883

Please call her now.

This is her new call number. Please call her.

Please call him back.

I have a terrible for him.
<table>
<thead>
<tr>
<th>DATE</th>
<th>TIME</th>
<th>IMPORTANT MESSAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>3/13/05</td>
<td>8:50 A.M.</td>
<td>RUSH</td>
</tr>
<tr>
<td>3/13/05</td>
<td>8:10 A.M.</td>
<td>WILL CALL AGAIN</td>
</tr>
<tr>
<td>3/13/05</td>
<td>8:10 A.M.</td>
<td>SPECIAL ATTENTION</td>
</tr>
<tr>
<td>3/13/05</td>
<td>8:10 A.M.</td>
<td>SPECIAL ATTENTION</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DATE</th>
<th>TIME</th>
<th>IMPORTANT MESSAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>3/14/05</td>
<td>12:55 P.M.</td>
<td>RUSH</td>
</tr>
<tr>
<td>3/14/05</td>
<td>12:55 P.M.</td>
<td>WILL CALL AGAIN</td>
</tr>
<tr>
<td>3/14/05</td>
<td>12:55 P.M.</td>
<td>SPECIAL ATTENTION</td>
</tr>
<tr>
<td>3/14/05</td>
<td>12:55 P.M.</td>
<td>SPECIAL ATTENTION</td>
</tr>
</tbody>
</table>

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<tr>
<th>DATE</th>
<th>TIME</th>
<th>IMPORTANT MESSAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>3/12/05</td>
<td>9:20 P.M.</td>
<td>RUSH</td>
</tr>
<tr>
<td>3/12/05</td>
<td>9:20 P.M.</td>
<td>WILL CALL AGAIN</td>
</tr>
<tr>
<td>3/12/05</td>
<td>9:20 P.M.</td>
<td>SPECIAL ATTENTION</td>
</tr>
<tr>
<td>3/12/05</td>
<td>9:20 P.M.</td>
<td>SPECIAL ATTENTION</td>
</tr>
</tbody>
</table>

Note: The contents of the messages have been redacted for privacy.
Case 18-2868, Document 283, 08/09/2019, 2628241, Page511 of 883
Case 18-2868, Document 283, 08/09/2019, 2628241, Page512 of 883
### Case 18-2868, Document 283, 08/09/2019, 2628241, Page 513 of 883

<table>
<thead>
<tr>
<th>IMPORTANT MESSAGE</th>
<th>IMPORTANT MESSAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>FOR</strong> SARAH</td>
<td><strong>FOR</strong> MR. EPSTEIN</td>
</tr>
<tr>
<td><strong>DATE</strong> 07/10/04</td>
<td><strong>DATE</strong> 07/10/04</td>
</tr>
<tr>
<td><strong>TIME</strong> 6:33 A.M.</td>
<td><strong>TIME</strong> 6:33 A.M.</td>
</tr>
<tr>
<td><strong>OF</strong> RAGHU</td>
<td><strong>OF</strong> CICINIA (OFFICE)</td>
</tr>
</tbody>
</table>

**TELEPHONED** | **PLEASE CALL**
---|---
**CAMED TO SEE YOU** | WILL CALL AGAIN
**WANTS TO SEE YOU** | RUSH
**RETURNED YOUR CALL** | SPECIAL ATTENTION

**MESSAGE**
- PL CALL

**SIGNED**

<table>
<thead>
<tr>
<th>IMPORTANT MESSAGE</th>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>FOR</strong> SARAH</td>
<td><strong>FOR</strong> MR. EPSTEIN</td>
</tr>
<tr>
<td><strong>DATE</strong> 07/10/04</td>
<td><strong>DATE</strong> 07/10/04</td>
</tr>
<tr>
<td><strong>TIME</strong> 11:31 A.M.</td>
<td><strong>TIME</strong> 7:50 A.M.</td>
</tr>
<tr>
<td><strong>MILES</strong></td>
<td><strong>MILES</strong></td>
</tr>
</tbody>
</table>

**TELEPHONED** | **PLEASE CALL**
---|---
**CAMED TO SEE YOU** | WILL CALL AGAIN
**WANTS TO SEE YOU** | RUSH
**RETURNED YOUR CALL** | SPECIAL ATTENTION

**MESSAGE**
- IN WORKING
- PLEASE CALL
- TTY
- TTY
- TTY
- TTY
- TTY

**SIGNED**

**AVAILABLE ON TUESDAY**
- NO ONE FOR TOMORROW

**SAO01461**
### Case 18-2868, Document 283, 08/09/2019, 2628241, Page 514 of 883

#### Important Message

**For:** Sarah

**Date:** 1/17/14

**Time:** 8:02 PM

**Phon: GEORGE**

**Telephoned:**

- Please Call
- Came to See You
- Wants to See You
- Returned Your Call

**Message:**

I am JET-LAG and NAPPING OFF. Just say I called HER.

**Signed:** N

---

**For:** Sarah or MR Epstein

**Date:** 1/17/14

**Time:** 6:55 AM

**Phon: **

**Telephoned:**

- Please Call
- Came to See You
- Wants to See You
- Returned Your Call

**Message:**

CAN COME TOMORROW ANY TIME OR ALONE

**Signed:** RD

---

**For:** Sarah or Mr Epstein

**Date:** 07/17/14

**Time:** 6:45 AM

**Phon: **

**Telephoned:**

- Please Call
- Came to See You
- Wants to See You
- Returned Your Call

**Message:**

WAS IN A CAR ACCIDENT ON HER WAY SO CAN NOT COME. SHE JUST GOT BACK

**Signed:** N
<table>
<thead>
<tr>
<th>FOR</th>
<th>JEFFREY</th>
<th>FOR</th>
<th>MR. EPSTEIN</th>
</tr>
</thead>
<tbody>
<tr>
<td>DATE</td>
<td>AUG. 3</td>
<td>DATE</td>
<td>7/25/04</td>
</tr>
<tr>
<td>TIME</td>
<td>12:45 PM</td>
<td>TIME</td>
<td>5:02 PM</td>
</tr>
<tr>
<td>M</td>
<td></td>
<td>M</td>
<td></td>
</tr>
<tr>
<td>OF PHONE/MOBILE</td>
<td></td>
<td>OF</td>
<td>SNYDER</td>
</tr>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TELEPHONED</td>
<td></td>
<td>TELEPHONED</td>
<td></td>
</tr>
<tr>
<td>CAME TO SEE YOU</td>
<td></td>
<td>CAME TO SEE YOU</td>
<td></td>
</tr>
<tr>
<td>WANTS TO SEE YOU</td>
<td></td>
<td>WANTS TO SEE YOU</td>
<td></td>
</tr>
<tr>
<td>RETURNED YOUR CALL</td>
<td></td>
<td>RETURNED YOUR CALL</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>MESSAGE</td>
<td>&quot;RETURNING YOUR CALL&quot;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>MESSAGE</td>
<td>&quot;TELL HIM TO CALL ME&quot;</td>
</tr>
</tbody>
</table>

**Case 18-2868, Document 283, 08/09/2019, 2628241, Page 515 of 883**
Case 18-2868, Document 283, 08/09/2019, 2628241, Page516 of 883

**IMPORTANT MESSAGE**

**FOR:** J.E.

**DATE:** 8/20/05  **TIME:** 8:45 AM

**OF:** Tony

**PHONE/MOBILE:**

<table>
<thead>
<tr>
<th>TELEPHONED</th>
<th>PLEASE CALL</th>
<th>X</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAME TO SEE YOU</td>
<td>WILL CALL AGAIN</td>
<td></td>
</tr>
<tr>
<td>WANTS TO SEE YOU</td>
<td>RUSH</td>
<td></td>
</tr>
<tr>
<td>RETURNED YOUR CALL</td>
<td>SPECIAL ATTENTION</td>
<td></td>
</tr>
</tbody>
</table>

**MESSAGE:***

Signed: J.  1184

---

**IMPORTANT MESSAGE**

**FOR:** J.E.

**DATE:** 8/20/05  **TIME:** 12:40 PM

**OF:**

**PHONE/MOBILE:**

<table>
<thead>
<tr>
<th>TELEPHONED</th>
<th>PLEASE CALL</th>
<th>X</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAME TO SEE YOU</td>
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<td>RUSH</td>
<td></td>
</tr>
<tr>
<td>RETURNED YOUR CALL</td>
<td>SPECIAL ATTENTION</td>
<td></td>
</tr>
</tbody>
</table>

**MESSAGE:***

**PLEASE CALL HIR**

Signed: J.  1184

---

**IMPORTANT MESSAGE**

**FOR:** J.E.

**DATE:** 8/20/05  **TIME:** 8:50 AM

**OF:** Sarah

**PHONE/MOBILE:**

<table>
<thead>
<tr>
<th>TELEPHONED</th>
<th>PLEASE CALL</th>
<th>X</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAME TO SEE YOU</td>
<td>WILL CALL AGAIN</td>
<td></td>
</tr>
<tr>
<td>WANTS TO SEE YOU</td>
<td>RUSH</td>
<td></td>
</tr>
<tr>
<td>RETURNED YOUR CALL</td>
<td>SPECIAL ATTENTION</td>
<td></td>
</tr>
</tbody>
</table>

**MESSAGE:***

confirmed 4 PM

WHO IS SCHEDULED for morning?

I believe [redacted] wants to work.

Signed: J.  1184

---

**IMPORTANT MESSAGE**

**FOR:** J.E.

**DATE:** 8/20/05  **TIME:** 7:30 PM

**OF:**

**PHONE/MOBILE:**

<table>
<thead>
<tr>
<th>TELEPHONED</th>
<th>PLEASE CALL</th>
<th>X</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAME TO SEE YOU</td>
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<tr>
<td>WANTS TO SEE YOU</td>
<td>RUSH</td>
<td></td>
</tr>
<tr>
<td>RETURNED YOUR CALL</td>
<td>SPECIAL ATTENTION</td>
<td></td>
</tr>
</tbody>
</table>

**MESSAGE:***

SAO01476

Signed: J.  1184

---

**IMPORTANT MESSAGE**

**FOR:** J.E.

**DATE:** 8/20/05  **TIME:**

**OF:**

**PHONE/MOBILE:**

<table>
<thead>
<tr>
<th>TELEPHONED</th>
<th>PLEASE CALL</th>
<th>X</th>
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<td>RUSH</td>
<td></td>
</tr>
<tr>
<td>RETURNED YOUR CALL</td>
<td>SPECIAL ATTENTION</td>
<td></td>
</tr>
</tbody>
</table>

**MESSAGE:***

Signed: J.  1184

---

GIUFFRE001448
<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Message</th>
</tr>
</thead>
<tbody>
<tr>
<td>8/21/18</td>
<td>9:45 PM</td>
<td>I left message for J.F.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>confirming for 11:00 AM and for 4:30 PM</td>
</tr>
<tr>
<td>3/4/18</td>
<td>12:58 PM</td>
<td>She would like to reschedule her time.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3/7/18</td>
<td>8:27 AM</td>
<td></td>
</tr>
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<td></td>
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<td></td>
</tr>
</tbody>
</table>
**Case 18-2868, Document 283, 08/09/2019, 2628241, Page518 of 883**

**IMPORTANT MESSAGE**

**FOR:** Jeffrey

**TIME:** 5:11 A.M.

**OF:**

**TELEPHONED**

**PLEASE CALL**

**COMING TO SEE YOU**

WANTS TO SEE YOU

**RETURNED YOUR CALL**

SPECIAL ATTENTION

**MESSAGE:** Has girl for tonight

**SIGNED:**

---

**IMPORTANT MESSAGE**

**FOR:** Mr. Epstein

**DATE:** 4/24/04

**TIME:** 8:29 A.M.

**OF:** Mr. Mark Epstein

**TELEPHONED**

**PLEASE CALL**

**COMING TO SEE YOU**

WANTS TO SEE YOU

**RETURNED YOUR CALL**

SPECIAL ATTENTION

**MESSAGE:** Call me in New York

**SIGNED:**

---

**IMPORTANT MESSAGE**

**FOR:** L. Epstein

**DATE:** 4/24/04

**TIME:** 5:29 P.M.

**OF:** Dr. LaJenon

**TELEPHONED**

**PLEASE CALL**

**COMING TO SEE YOU**

WANTS TO SEE YOU

**RETURNED YOUR CALL**

SPECIAL ATTENTION

**MESSAGE:** Will be available at this number for 30 min. Otherwise tomorrow 9 A.M. to 10 P.M.

**SIGNED:**

---

**IMPORTANT MESSAGE**

**FOR:** Jeffrey

**DATE:** 4/24/04

**TIME:** 12:30 P.M.

**OF:** Dr. Moshewitzi

**TELEPHONED**

**PLEASE CALL**

**COMING TO SEE YOU**

WANTS TO SEE YOU

**RETURNED YOUR CALL**

SPECIAL ATTENTION

**MESSAGE:**

**SIGNED:**

---

**SAO2828**
Case 18-2868, Document 283, 08/09/2019, 2628241, Page519 of 883

IMPORTANT MESSAGE
FOR: Jeffrey
DATE: 4/25/04
TIME: 4:50 A.M.
M. Larry
OF: PHONE/MOBILE
TELEPHONED: PLEASE CALL
CAME TO SEE YOU: WILL CALL AGAIN
WANTS TO SEE YOU: SPECIAL ATTENTION
RETURNED YOUR CALL: SPECIAL ATTENTION
MESSAGE: Returning call

IMPORTANT MESSAGE
FOR:
DATE: 4/25/04
TIME: 9:50 A.M.
M. Larry
OF: PHONE/MOBILE
TELEPHONED: PLEASE CALL
CAME TO SEE YOU: WILL CALL AGAIN
WANTS TO SEE YOU: SPECIAL ATTENTION
RETURNED YOUR CALL: SPECIAL ATTENTION
MESSAGE: Returning call

IMPORTANT MESSAGE
FOR:
DATE: 4/25/04
TIME: 9:50 A.M.
M. Larry
OF: PHONE/MOBILE
TELEPHONED: PLEASE CALL
CAME TO SEE YOU: WILL CALL AGAIN
WANTS TO SEE YOU: SPECIAL ATTENTION
RETURNED YOUR CALL: SPECIAL ATTENTION
MESSAGE: Returning call

IMPORTANT MESSAGE
FOR: Mark Epstein
DATE: 4/25/04
TIME: 9:07 A.M.
M. Evi Dubin
OF: PHONE/MOBILE
TELEPHONED: PLEASE CALL
CAME TO SEE YOU: WILL CALL AGAIN
WANTS TO SEE YOU: SPECIAL ATTENTION
RETURNED YOUR CALL: SPECIAL ATTENTION
MESSAGE: Returning call

SIGNATURES

SAO2829

GIUFFRE001453
<table>
<thead>
<tr>
<th>Message</th>
<th>Return your call</th>
</tr>
</thead>
<tbody>
<tr>
<td>Message</td>
<td>Return your call</td>
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<tr>
<td>Message</td>
<td>Return your call</td>
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<tr>
<td>Message</td>
<td>Return your call</td>
</tr>
</tbody>
</table>

**Case 18-2868, Document 283, 08/09/2019, 2628241, Page 520 of 883**
IMPORTANT MESSAGE
FOR: Mr. Epstein
DATE: 5/3/04
TIME: 7 P.M.
OF:
PHONE/MOBILE
TELEPHONED: PLEASE CALL
CAME TO SEE YOU: WILL CALL AGAIN
WANTS TO SEE YOU: RUSH
RETURNED YOUR CALL: SPECIAL ATTENTION
MESSAGE: THERE IS A BEEP - CONTINUOUS
COMING FROM COMPUTER IN CASANA
SIGNED: Lucian

IMPORTANT MESSAGE
FOR: Mr. Epstein
DATE: 5/2/04
TIME: 4:15 P.M.
OF:
PHONE/MOBILE
TELEPHONED: PLEASE CALL
CAME TO SEE YOU: WILL CALL AGAIN
WANTS TO SEE YOU: RUSH
RETURNED YOUR CALL: SPECIAL ATTENTION
MESSAGE: CALLED
SIGNED: 

IMPORTANT MESSAGE
FOR: JF
DATE: 5/14 AM
TIME: 5:14 P.M.
OF:
PHONE/MOBILE
TELEPHONED: PLEASE CALL
CAME TO SEE YOU: WILL CALL AGAIN
WANTS TO SEE YOU: RUSH
RETURNED YOUR CALL: SPECIAL ATTENTION
MESSAGE: He just did a good
one - 19 years;
(She spoke to me & said
"I love Jeffrey ")
SIGNED: 

IMPORTANT MESSAGE
FOR: JF
DATE: 5/15 AM
TIME: 9:15 AM
OF:
PHONE/MOBILE
TELEPHONED: PLEASE CALL
CAME TO SEE YOU: WILL CALL AGAIN
WANTS TO SEE YOU: RUSH
RETURNED YOUR CALL: SPECIAL ATTENTION
MESSAGE: 
SIGNED: SAO2832
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<table>
<thead>
<tr>
<th>Case 18-2868, Document 283, 08/09/2019, 2628241, Page522 of 883</th>
</tr>
</thead>
</table>

### IMPORTANT MESSAGE

**FOR:** MR. EPSTEIN  
**DATE:** 7/6  
**TIME:** 6:00 PM  
**OF:** DARREN  
**PHONE/MOBILE:**  
- TELEPHONED: PLEASE CALL
- CAME TO SEE YOU: WILL CALL AGAIN
- WANTS TO SEE YOU: RUSH
- RETURNED YOUR CALL: SPECIAL ATTENTION

**MESSAGE:**

He said that he got a call from Byron

**SIGNED:**

<table>
<thead>
<tr>
<th>Case 18-2868, Document 283, 08/09/2019, 2628241, Page522 of 883</th>
</tr>
</thead>
</table>

### IMPORTANT MESSAGE

**FOR:** JF  
**DATE:** 8/1  
**TIME:** 8:10 AM  
**OF:**  
**PHONE/MOBILE:**  
- TELEPHONED: PLEASE CALL
- CAME TO SEE YOU: WILL CALL AGAIN
- WANTS TO SEE YOU: RUSH
- RETURNED YOUR CALL: SPECIAL ATTENTION

**MESSAGE:**

I need a work  
I need U. I don't have money  
Do you have more work for me?

**SIGNED:**

<table>
<thead>
<tr>
<th>Case 18-2868, Document 283, 08/09/2019, 2628241, Page522 of 883</th>
</tr>
</thead>
</table>

### IMPORTANT MESSAGE

**FOR:** SARAH  
**DATE:** 8/1  
**TIME:** 8:10 AM  
**OF:**  
**PHONE/MOBILE:**  
- TELEPHONED: PLEASE CALL
- CAME TO SEE YOU: WILL CALL AGAIN
- WANTS TO SEE YOU: RUSH
- RETURNED YOUR CALL: SPECIAL ATTENTION

**MESSAGE:**

SAO2838

**SIGNED:**

| Case 18-2868, Document 283, 08/09/2019, 2628241, Page522 of 883 |
Case 18-2868, Document 283, 08/09/2019, 2628241, Page523 of 883

She said she would call back and talk to her mother about it. She said she would call her on her cell phone and her mother on her home phone. She said she would call her at 10:00 on Friday. She also called her grandson and asked him to come over for dinner with her grandson.

She will see you at 7:30.
**IMPORTANT MESSAGE**

**FOR:** Jeffrey
**DATE:** 3/11/05
**TIME:** 8:09 P.M.

**O.F.:** Jean - Luc

**TELEPHONED:** 1
**PLEASE CALL:**
**CAME TO SEE YOU:** WILL CALL AGAIN
**WANTS TO SEE YOU:** RUSH
**RETURNED YOUR CALL:** SPECIAL ATTENTION

**MESSAGE:** He has a teacher for you to teach you how to speak Russian. She is 2x8 years old, not blonde. Lessons are free and you can have 1st today if you call.

**SIGNED:**

---

**IMPORTANT MESSAGE**

**FOR:** Jeffrey
**DATE:** 3/11/05
**TIME:** 5:06 A.M.

**O.F.:** [Redacted]

**TELEPHONED:** 0
**PLEASE CALL:**
**CAME TO SEE YOU:** WILL CALL AGAIN
**WANTS TO SEE YOU:** RUSH
**RETURNED YOUR CALL:** SPECIAL ATTENTION

**MESSAGE:** She called if you would like for her to work. She is available tomorrow until noon and Mon - Fri.

**SIGNED:**

---

**IMPORTANT MESSAGE**

**FOR:** Jeffrey
**DATE:** 3/11/05
**TIME:** 3:22 A.M.

**O.F.:** [Redacted]

**TELEPHONED:** 1
**PLEASE CALL:**
**CAME TO SEE YOU:** WILL CALL AGAIN
**WANTS TO SEE YOU:** RUSH
**RETURNED YOUR CALL:** SPECIAL ATTENTION

**MESSAGE:**

**SIGNED:**

---

**IMPORTANT MESSAGE**

**FOR:** Jeffrey
**DATE:** 3/11/05
**TIME:** 2:40 A.M.

**O.F.:** Cecilia

**TELEPHONED:** 0
**PLEASE CALL:**
**CAME TO SEE YOU:** WILL CALL AGAIN
**WANTS TO SEE YOU:** RUSH
**RETURNED YOUR CALL:** SPECIAL ATTENTION

**MESSAGE:** She had Martin on the phone.

**SIGNED:**

---

SAO3008
EXHIBIT 29
(Filed Under Seal)
EXHIBIT 30
(Filed Under Seal)
VIA COURIER
Ms. Virginia Roberts
c/o Asst Legal Attache Matthew Witt
United States Embassy
Sydney
Australia

Re: Jeffrey Epstein/Virginia Roberts: NOTIFICATION OF IDENTIFIED VICTIM

Dear Ms. Roberts:

By virtue of this letter, the United States Attorney’s Office for the Southern District of Florida provides you with the following notice because you are an identified victim of a federal offense.

On June 30, 2008, Jeffrey Epstein (hereinafter referred to as “Epstein”) entered a plea of guilty to violations of Florida Statutes Sections 796.07 (felony solicitation of prostitution) and 796.03 (procurement of minors to engage in prostitution), in the 15th Judicial Circuit in and for Palm Beach County (Case Nos. 2006-cf-009454AXXXMB and 2008-cf-009381AXXXMB) and was sentenced to a term of twelve months’ imprisonment to be followed by an additional six months’ imprisonment, followed by twelve months of Community Control 1, with conditions of community confinement imposed by the Court.

In light of the entry of the guilty plea and sentence, the United States has agreed to defer federal prosecution in favor of this state plea and sentence, subject to certain conditions, including the following:

1. An independent Special Master was assigned the task of selecting an attorney representative to represent the victims, including you, in connection with civil actions between the victims and Mr. Epstein. The
Special Master selected Robert Josefberg, Esq. of the firm Podhurst Orseck, P.A., a highly-respected and experienced attorney. You are not obligated to use Mr. Josefberg as your civil attorney, but, as explained in greater detail below, Mr. Josefberg’s services will be provided at no cost to you because Mr. Epstein is obligated to pay the costs and fees of the attorney-representative. Also, Mr. Epstein and his attorneys can only contact you via Mr. Josefberg, assuming that you would like Mr. Josefberg to serve as your attorney.

2. If you elect to file suit against Mr. Epstein pursuant to Title 18, United States Code, Section 2255, Mr. Epstein will not contest the jurisdiction of the United States District Court for the Southern District of Florida over his person and/or the subject matter, and Mr. Epstein waives his right to contest liability and also waives his right to contest damages up to an amount as agreed to between you and Mr. Epstein, so long as you elect to proceed exclusively under 18 U.S.C. § 2255, and you waive any other claim for damages, whether pursuant to state, federal, or common law. Notwithstanding this waiver, Epstein’s agreement with the United States, his waivers and failure to contest liability and such damages in any suit are not to be construed as an admission of any criminal or civil liability.

3. As stated above, Mr. Epstein has agreed to pay the fees of the attorney representative selected by the independent third party. This provision, however, shall not obligate Epstein to pay the fees and costs of contested litigation filed against him. Thus, if after consideration of potential settlements, you and Mr. Josefberg elect to file a contested lawsuit pursuant to 18 U.S.C. § 2255 or you elect to pursue any other contested remedy, the obligation to pay the costs of the attorney representative, as opposed to any statutory or other obligations to pay reasonable attorneys fees and costs such as those contained in Section 2255, shall cease.

Please contact either myself at ann.marie.c.villafana@usdoj.gov, or Justice Department Victim-Witness Specialist Twiler Smith at Twiler.Smith@ic.fbi.gov with a good telephone number and/or e-mail address, so that we may provide Mr. Josefberg with a timely means of communicating with you. If you would like to contact Mr. Josefberg
directly, he can be reached at +1 305 358-2800.

If you have already selected other counsel to represent you, or if you do so in the future, and you decide to file a claim against Jeffrey Epstein, Mr. Epstein’s attorney, Jack Goldberger, asks that you have your attorney contact Mr. Goldberger at Atterbury Goldberger and Weiss, 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401, (561) 659-8300.

In addition, there has been litigation between the United States and two other victims regarding the disclosure of the entire agreement between the United States and Mr. Epstein. Mr. Josefsberg can provide further guidance on this issue, or if you select another attorney to represent you, that attorney can review the Court’s order in the matter of In re Jane Does 1 and 2, United States District Court for the Southern District of Florida Court File No. 08-80736-CIV-MARRA.

Please understand that neither the U.S. Attorney’s Office nor the Federal Bureau of Investigation can take part in or otherwise assist in civil litigation. Thank you for all of your assistance during the course of the federal and state investigations and please accept the heartfelt regards of myself and Special Agents Kuyrkendall, Slater, and Richards for your health and well-being.

Sincerely,

R. Alexander Acosta
United States Attorney

By:

A. Marie Villafañe
Assistant United States Attorney

cc: Robert Josefsberg, Esq.
Jack Goldberger, Esq.
EXHIBIT 31
(Filed Under Seal)
VIRGINIA L. GIUFFRE, maiden name ROBERTS, date of birth [redacted] Social Security Account Number [redacted] Social Security Number [redacted] United States Citizen and Australian Permanent Resident, residence [redacted] New South Wales, Australia, 2261 was interviewed at the United States Consulate in Sydney, Australia. GIUFFRE was advised of the identity of the interviewing agents and purpose of the interview. Present during the interview was Federal Bureau of Investigation Special Agent [redacted] and via telephone, Assistant United States Attorney [redacted] GIUFFRE provided the following information:

GIUFFRE was born in Sacramento, California to parents [redacted] and currently resides in [redacted] and [redacted] date of birth [redacted] date of birth [redacted] currently resides in [redacted] GIUFFRE moved to Palm Beach County, Florida with her parents when she was four years old and returned to California at age 11. She returned to Florida at age 13 and was placed in a rehabilitation or foster care facility in West Palm Beach, Florida.

GIUFFRE ran away from the rehabilitation facility when she was approximately 14 years old, and while living on the streets in Miami, Florida, she met [redacted] was training GIUFFRE to be an escort [redacted] gave GIUFFRE a life off of the streets which made her feel

Investigation on 03/17/2011 at Sydney, Australia (In Person)

File # 31E-MM-108062 Date drafted 07/05/2013

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.
like she was locked into the relationship gave GIUFFRE pharmaceutical drugs toward the end of their relationship.

GIUFFRE's relationship with ended while she was at a private ranch near Ocala, Florida. GIUFFRE telephonically contacted a childhood friend, from a telephone at the ranch. GIUFFRE knew from elementary school and called him at the home telephone of his parents. GIUFFRE told she was very lonely, and asked her why she did not leave. GIUFFRE's telephone conversation with the recreational vehicle (RV) GIUFFRE was staying in at the ranch did not strike her to pack her belongings and told her she was going to live with another man.

felt that she was sent to but did not know the specifics of the arrangement. GIUFFRE engaged in sexual activity with who was described as a white male. GIUFFRE stated GIUFFRE stayed with LNU for approximately one or two weeks before the police located her and returned her to her parents. GIUFFRE was interviewed by a male detective. GIUFFRE's parents were still married at the time and lived near Florida. GIUFFRE believed there was an FBI investigation related to She never saw again after

In approximately June 1998 or 1999, GIUFFRE began working at Donald Trump's Mar-A-Lago Club in Palm Beach, Florida. GIUFFRE's father was able to help her gain employment as a baby sitter and later as a locker room attendant at the club. GIUFFRE started studying for her GED and wanted to become a massage therapist. In August, GIUFFRE was reading an anatomy/massage book and was approached by and help her get her masseuse accreditation.

GIUFFRE consulted her father about the opportunity and at approximately 5:00 p.m. the same day, her father drove her to a residence at
Florida. Spoke with GIUFFRE's father and told him it was a wonderful opportunity for GIUFFRE. GIUFFRE met also known as GIUFFRE was led upstairs.

Once upstairs instructed GIUFFRE to wash her hands prior to beginning the massage. The massage began demonstrated massage techniques to GIUFFRE.

During the course of the massage questioned GIUFFRE about her past, including her time as a runaway. GIUFFRE was also asked if she took birth control.

GIUFFRE was given instruction and began kissing

At the conclusion, instructed GIUFFRE to obtain two warm wash clothes. One wash cloth was used to clean second was described to help him relax. GIUFFRE and GIUFFRE then moved to the steam room and shower where GIUFFRE massaged with soap and a loofah in the shower.

At the conclusion of the shower, GIUFFRE went downstairs and

Arrangements were made for GIUFFRE to return to the house the following day after work. GIUFFRE's cellular phone number was given to
The same routine and pattern of massages and sexual activity between
and GIUFFRE continued for between one and two weeks. At
times, Giuffre offered Giuffre the option to quit her
job at Mar-A-Lago and travel. There
was also discussion of Giuffre receiving massage training. Giuffre was to
be paid $200.00 per day for travel and $200.00 per hour for massages.

Early in her relationship with Giuffre met
and was introduced as assistant.

Giuffre soon began traveling. For the initial six months,
Giuffre traveled around the United States and Caribbean,
including California, New York City, New Mexico, and various business
trips. During those trips,

Six to nine months after Giuffre began working for Giuffre,
Giuffre was
introduced to LNU.

At the time, Giuffre met the couple at a condominium next to the
The condominium was bought
and was a
In the condominium,
Giuffre provided a normal massage to LNU. Shortly thereafter, LNU
Giuffre provided an erotic massage to
Giuffre
and
Giuffre cleaned.

She was
paid cash
and
paid Giuffre

16 years old at the time.

Giuffre advised introduced her to the drug Xanax. She explained that Xanax helped her escape from reality but allowed her to
still function normally. Xanax helped her go forward with what she was
doing with others. Her habit went from two pills per day up to
eight pills per day.

Giuffre's second client was an academic of some sort described as an
older American male
sent Giuffre
from Miami International Airport to
by commercial airline. Giuffre was picked up at the
airport by
and then taken to the island by boat. Giuffre
pointed out that instructed GIUFFRE to entertain the client and wanted to ride jet skis and participate in other island activities. GIUFFRE spent two days on the island with the client. GIUFFRE assumes the client also traveled commercially.

During the following several months, GIUFFRE traveled internationally. Prior to her traveling abroad, assisted GIUFFRE in getting her passport. GIUFFRE got passport photographs of herself and provided them to the remaining paperwork was taken care of by GIUFFRE traveled to Paris, France, the South of France, London, England, Africa, and Spain. While in Paris, GIUFFRE recalled staying at a hotel overlooking the Champs-Elysees. While traveling GIUFFRE traveled on a black plane. During the international travel, times, GIUFFRE would

Rarely a day would pass

contacted GIUFFRE through and wanted to talk to GIUFFRE about and offered GIUFFRE a contract. GIUFFRE agreed to the contract for her story and was paid $140,000 for the story, $10,000 when the article was printed, and another $10,000 to be wired into GIUFFRE's account in May 2011. The contract prevented GIUFFRE from talking to any other press for a specified period. GIUFFRE advised that she provided with detailed information
b6
b7C

At age 16, GIUFFRE believed she and were approximately the same age. GIUFFRE and

b6
b7C

GIUFFRE would dress

b6
b7C

GIUFFRE, though explained GIUFFRE provided an

b6
b7C

GIUFFRE described

An unknown individual GIUFFRE saw when she arrived at

b6
b7C

GIUFFRE had

GIUFFRE said that day was a low stage in her relationship because she could not believe

b6
b7C

GIUFFRE never
GIUFFRE believed the girls may have been but GIUFFRE was not certain of involvement.

GIUFFRE had a picture of herself she wanted to give

GIUFFRE described some of the unique interior areas of which GIUFFRE referred to which was where GIUFFRE stayed.

While in New York, GIUFFRE also stayed at an apartment on 66th street GIUFFRE was aware of additional apartments in the same building. According to the apartment building on 66th street was owned by GIUFFRE advised that she had a photograph of the interior of the 66th Street apartment among other photos

GIUFFRE advised that some of her photographs that were provided to her civil attorneys by her family were not returned. One of the missing photos depicted GIUFFRE wearing a pink dress while seated on a quad bike. LNU was female that formerly lived in
LNU and GIUFFRE went shopping together and purchased clothing and sex toys. GIUFFRE explained that

GIUFFRE used a cellular telephone she believed it was a New York City number but could not recall the number. GIUFFRE and

GIUFFRE could only remember faces but not their names. GIUFFRE did not unsuccessfully to get

GIUFFRE recalled but she could not recall the wording. GIUFFRE advised

GIUFFRE traveled to a self-help conference at a hotel in New Orleans, Louisiana. The hotel was near the Hard Rock Café in New Orleans. GIUFFRE traveled the world including the USVI, New York, Santa Fe, Palm Beach, France, Africa, Spain and the United Kingdom.

GIUFFRE recalled visiting Alhambra Castle in Spain. GIUFFRE eventually traveled to the United Kingdom and
while there approached GIUFFRE in a very excited manner and told her they had to go shopping to pick out a dress because GIUFFRE would be dancing with.

GIUFFRE and went shopping and purchased makeup, clothing, and a Burberry bag. The items were purchased with and returned instructed GIUFFRE to get ready. When GIUFFRE came down after getting ready, she was introduced to.

GIUFFRE traveled to CLUB TRAMP danced at CLUB TRAMP stayed at CLUB TRAMP for an hour or hour and a half and drank a couple of cocktails before returning to GIUFFRE had not received any direction from.

After returning to GIUFFRE requested to take a photograph of her GIUFFRE advised that she still had the original photograph in her possession and would provide it to the interviewing agents. GIUFFRE proceeded with.

Approximately two months later, GIUFFRE met at

GIUFFRE recalled

GIUFFRE recalled joking about trading GIUFFRE in because she was getting too old.
GIUFFRE recalled meeting GIUFFRE was using Xanax heavily at the time, and her recollection was not clear. She remembered there were many models on the island that did not speak English along with a modeling person who had an unknown accent.

GIUFFRE did not have a problem with GIUFFRE using prescription drugs. was described by GIUFFRE as a

(TRUE NAME UNKNOWN) a ranch employee in but GIUFFRE could not recall his name. She did have a photograph of the ranch employee.

GIUFFRE met numerous famous people including academics, politicians, and celebrities. She met and

GIUFFRE received many gifts including jewelry, watches, bags, shoes, make up, clothing, and home furnishings.

GIUFFRE left all of the items behind when she traveled to Thailand to receive massage training.

In August 2002, GIUFFRE traveled by commercial airline to Bangkok, Thailand and began her massage training at International Training Massage School (ITM) where she received her massage certification. She stayed at the Princess Hotel in Thailand but never did. GIUFFRE met her future husband, during her visit to Thailand. GIUFFRE contactend telephonically and told him she had fallen in love with someone.
GIUFFRE had not heard from telephone call from [Blank]. During that call [Blank] stated he was an FBI agent. He was trying to determine what she knew about [Blank]. She did not tell [Blank] anything about her knowledge of [Blank]. She also received another telephone call from a person that indicated he was an FBI agent. She did not tell that individual anything either. She also received a call from an attorney that was trying to determine if she had spoken with anyone or was willing to speak to anyone. She explained that she was receiving telephone calls from people whom she did not know and that she was uncomfortable telling them anything over the telephone.

One or two weeks later, an unknown attorney and [Blank] contacted GIUFFRE telephonically.

GIUFFRE was using a cellular telephone belonging to her husband. She nor her husband could recall the telephone number but advised that the carrier was OPTUS telephone company.

GIUFFRE reviewed a series of photographs of individuals and identified the following:

Page 1, number 1, [Blank]
Page 1, number 2, [Blank] LNU, a.k.a. [Blank]
Page 2, number 1, [Blank]
Page 2, number 6, [Blank]
Page 3, number 2, [Blank]
Page 4, number 3, [Blank] LNU
Page 4, number 7, [Blank]
Page 4, number 8, [Blank]
Page 5, number 1, [Blank]

GIUFFRE advised that the following were familiar to her, but she could not recall their names or her association to them:
The images reviewed by GIUFFRE were placed in a 1A envelope of the case file.

When questioned about United States Customs and Border (CBP) Patrol records of her entries into the United States, GIUFFRE advised that her January 2001 record was the return from her London, England trip. The April 2001 CBP record was her return to the United States. GIUFFRE could not recall her travel from March and May 2001 CBP records. GIUFFRE advised that her United States Passport was turned over to the United States Consulate in Sydney, Australia.

On March 18, 2011, writer, SA and traveled to GIUFFRE's residence where she provided 20 photographs and her ITM massage school certification. FD-597 Receipts for Property were executed for the items and a copy was provided to GIUFFRE. It is noted that the receipts were dated based on the United States Eastern Standard Time Zone date. The photographs, certification and original FD-597s were placed in a 1A envelopes of case file.
EXHIBIT 32
(Filed Under Seal)
Case 18-2868, Document 283, 08/09/2019, 2628241, Page544 of 883
MOM

DANNY

G-MA DAISY

MY NANTHIBA THARANACHET NAY

STILL BE IN THAILAND DURING YOUR

STAY. IF SHE IS, SHE WILL BE

STAYING AT THE SAME HOTEL.
EXHIBIT 33
(Filed Under Seal)
December 30, 2014

New York Presbyterian Hospital
Weill Cornell Medical Center
Medical Records
525 East 68 Street
New York, NY 10065

RE: Request for MEDICAL RECORDS and BILLING

Our Client/Your Patient: [Redacted]
Date of Birth: [Redacted]
Our File Number: [Redacted]

To Whom It May Concern:

This is a follow up to our original December 1, 2014 request for medical records (a copy of same is attached for your convenience). Attached, please find a copy of the Refused/Returned Notice for your convenience. Pursuant to same, please be advised that we would like ALL records from August 9, 1983 – present. If that is too general/broad, please limit the search to January 1, 1998 to December 31, 2000.

Please contact us if the reproduction costs exceed $50.00.

Please contact us if you have any questions or wish to discuss this matter further. We look forward to your prompt compliance with this request.

Very truly yours,
FARMER, JAFFE, WEISSING, EDWARDS, PISTOS & LEHRMAN, P.L.

Amy W. Dishowitz, Paralegal
For Bradley J. Edwards, Esq.
BTE: awd
Enclosures

RECEIVED
JAN 6 2015

BY: _______________________

425 North Andrews Avenue, Suite 2, Fort Lauderdale, Florida 33301
954.524.2820 office 954.524.2822 fax

CONFIDENTIAL
December 30, 2014

New York Presbyterian Hospital
Weill Cornell Medical Center
Medical Records
525 East 68 Street
New York, NY 10065

RE: Request for MEDICAL RECORDS and BILLING
Our Client/Your Patient: Virginia Roberts
Date of Birth: January 1, 1998 – December 31, 2000
Our File Number:

To Whom It May Concern:

This is a follow up to our original December 1, 2014 request for medical records (a copy of same is attached for your convenience). Attached, please find a copy of the Refused/Returned Notice for your convenience. Pursuant to same, please be advised that we would like ALL records from August 9, 1983 – present. If that is too general/broad, please limit the search to January 1, 1998 to December 31, 2000.

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Very truly yours,
FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L.

Amy W. Dishowitz, Paralegal
For Bradley J. Edwards, Esq.
BJE: awd
Enclosures

[Stamp] RECEIVED JAN 06 2015

425 North Andrews Avenue, Suite 2, Fort Lauderdale, Florida 33301
954.524.2820 office 954.524.2822 fax

CONFIDENTIAL
**NEW YORK PRESBYTERIAN HOSPITAL**

**New York Weill Cornell Medical Center**

---

### Case Documentation Sheet

**Date:** 08/09/2019  
**ID:** 2628241  
**Page:** 549 of 883

---

**Name:** Roberts, Virginia L.  
**Status:** ER

---

**Assessment:**

- **Symptoms:** Headache, Fainting
- **Events:** Headache, Fainting

---

**Triage Interventions:**

- **Lives:** LIES
- **Level:** Low

---

**Mental Status:**

- Normal

---

**Skin Color:**

- Normal

---

**Regurgitation:**

- None

---

**Blood Pressure:**

- Normal

---

**Speech:**

- Normal

---

**ABO/UR:**

- O

---

**Gyn:**

- Normal

---

**Obstetric History:**

- None

---

**Electrocardiogram:**

- Normal

---

**Lungs:**

- Clear

---

**Respirations:**

- Normal

---

**Pulse:**

- Normal

---

**Temperature:**

- Normal

---

**Blood Glucose:**

- Normal

---

**Drug Allergies:**

- None

---

**Past Medical History:**

- None

---

**Family History:**

- None

---

**Social History:**

- None

---

**Physical Exam:**

- Normal

---

**Diagnosis:**

- Headache, Fainting

---

**Discharge:**

- Discharged

---

**Comment:**

- None

---

**Signature:**

- Discharged

---

**Chart Copy:**

- Discharged

---

**Confidential**
NEW YORK-PRESBYTERIAN HOSPITAL
New York Well Cornell Medical Center

EMERGENCY NOTES, Continuation
EMERGENCY DEPARTMENT

Intubated, fever 102.5, presents with pain, N/V, Hx

S / O: Fever, St Bernard Pap, sudden onset bilateral discharge x 3 yrs (years)

Exacerbation of sneezing, 2 days ago, with sore throat and facial rash. Patient presents with severe, constant right eye pain. No relief with acetaminophen.

Previous: History of right-sided sneeze during the work week.

Examination: Right eye red and inflamed, no improvement with acetaminophen.

Vital Signs:
- Temperature: 102.5°F
- Blood Pressure: 118/78 mmHg
- Pulse: 80 bpm
- Respiratory Rate: 14

Physical Exam:
- Conjunctivitis, right eye
- Slit-lamp examination shows acute iritis

Plan:
- O/L's ordered
- Allergies - WBC

Past Hx - Status Post Scleritis

Social Hx - No significant social/hist Meds

None...

Colin Steckmet, MD

M.D. 08/09/19

Page 3
01-09-2019 21:13:54

CONFIDENTIAL
Case 18-2868, Document 283, 08/09/2019, 2628241, Page552 of 883
**NEW YORK-PRESBYTERIAN HOSPITAL**
New York Weill Cornell Medical Center

---

**EMERGENCY NURSING FLOW SHEET**
EMERGENCY DEPARTMENT

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**Allergies: NA**

**Nurse: NA**

**Initials: NA**

---

**Case 18-2868, Document 283, 08/09/2019, 2628241, Page 553 of 883**
EMERGENCY NOTES, Continuation
EMERGENCY DEPARTMENT

FT resulted in GC/Metronidazole and Vaginal Health
results reported as ft. on negative vaginal HP.
ANONYMOUS

PROGRESS NOTES

DATE: 7/10/01  LOCATION: Internal Med

1800 hrs, IV d/c, 12:00 AM, reg.

Pt. presented at 7:30 PM with a 2 day history of nausea and vomiting. The patient also reported a temperature of 103.0°F, OMN x 12 R/L, BP 90/60, Pulse 126-130. Pt. went to ER for CMT & exam.

Pt. refused IV in ER.

Pt. was N/V, P/V noted.

CXR was done, showed "normal" Pt. has NO abdominal tenderness or distention. S/G/S was normal & CMT. Pt. was admitted & PTs

Pt. was noted to be 

No further Rx for the next 2 days. Pt. was discharged & was stable. Pt. was seen in the office on 7/11 & 7/12.

[Signature]

7/10/01

X64015

CONFIDENTIAL

GIIFSRE003256
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L-LOW, H-HIGH

OUTPATIENT REPORT
**CLIENT INFORMATION:**

M. Desmond Burke, M.D., Laboratory Director

**Patient Name:** ROBERTIS, VIRGINIA L.

**Coll Date:** 07/09/2001  
**Coll Time:** 1911

**Recvd Date:** 07/09/2001  
**Recvd Time:** 1911

**Rpt Date:** 07/10/2001  
**Rpt Time:** 0438

**FINAL**

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**OUTPATIENT REPORT**

**Page:** 2  
**CONTINUED**
**Patient Name:** ROBERTS, VIRGINIA L.  
**Med Rec #:** 
**Date of Birth: **
**Sex: F**

**Coll Date:** 07/10/2001  
**Coll Time:** 1911

**Record Date:** 07/09/2001  
**Record Time:** 1911 
**Report Date:** 
**Report Time:** 0438

**CLIENT INFORMATION:**
EHOND, STEPHEN D MD  
525 East 68th Street  
New York  
NY

**Client #:** 00000  
**NEW YORK HOSPITAL**

**CANCELED TESTS**

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End of chart
### MACROSCOPIC URINALYSIS

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<td>pH</td>
<td>7.0</td>
<td>4.6-8.0</td>
<td></td>
</tr>
<tr>
<td>BILIRUBIN</td>
<td>NEGATIVE</td>
<td>NEGATIVE</td>
<td></td>
</tr>
<tr>
<td>SP GRAVITY</td>
<td>1.025</td>
<td>1.005-1.030</td>
<td></td>
</tr>
<tr>
<td>NITRATE</td>
<td>NEGATIVE</td>
<td>NEGATIVE</td>
<td></td>
</tr>
<tr>
<td>LEUKOCYTE ESTER</td>
<td>NEGATIVE</td>
<td>NEGATIVE</td>
<td></td>
</tr>
</tbody>
</table>

### MICROSCOPIC URINALYSIS

<table>
<thead>
<tr>
<th>Test Name</th>
<th>Abnormal</th>
<th>Normal</th>
<th>Reference Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>RBC/HFP</td>
<td>0-2</td>
<td>0-2</td>
<td></td>
</tr>
<tr>
<td>WBC/HFP</td>
<td>0-2</td>
<td>0-2</td>
<td></td>
</tr>
<tr>
<td>EPITHELIAL EPITHEL</td>
<td>NEGATIVE</td>
<td>NEGATIVE</td>
<td></td>
</tr>
</tbody>
</table>

**Note:**

This urine has been examined for RBC, WBC, casts, crystals and epithelial cells. Any of these elements not reported was not found.
## ROUTINE CHEMISTRY

<table>
<thead>
<tr>
<th>TEST NAME</th>
<th>ABNORMAL</th>
<th>NORMAL</th>
<th>REFERENCE UNITS</th>
</tr>
</thead>
<tbody>
<tr>
<td>GLOUCOSE</td>
<td>115</td>
<td>70-105</td>
<td>mg/dL</td>
</tr>
<tr>
<td>UREA NITROGEN</td>
<td>R</td>
<td>5-25</td>
<td>mg/dL</td>
</tr>
<tr>
<td>CREATININE</td>
<td>0.8</td>
<td>0.5-1.5</td>
<td>mg/dL</td>
</tr>
<tr>
<td>SODIUM</td>
<td>138</td>
<td>133-137</td>
<td>mmol/L</td>
</tr>
<tr>
<td>POTASSIUM</td>
<td>3.6</td>
<td>3.2-5.2</td>
<td>mmol/L</td>
</tr>
<tr>
<td>CHLORIDE</td>
<td>103</td>
<td>94-110</td>
<td>mmol/L</td>
</tr>
<tr>
<td>CO2</td>
<td>21</td>
<td>22-32</td>
<td>mmol/L</td>
</tr>
<tr>
<td>ANION GAP</td>
<td>14</td>
<td>05-17</td>
<td></td>
</tr>
<tr>
<td>URIC ACID</td>
<td>3.2</td>
<td>2.5-7.5</td>
<td>mg/dL</td>
</tr>
<tr>
<td>CALCIUM</td>
<td>9.0</td>
<td>8.5-10.5</td>
<td>mg/dL</td>
</tr>
<tr>
<td>PHOSPHORUS</td>
<td>3.4</td>
<td>2.2-4.2</td>
<td>mg/dL</td>
</tr>
<tr>
<td>PROTEIN, TOTAL</td>
<td>2.7</td>
<td>5.5-6.0</td>
<td>g/dL</td>
</tr>
<tr>
<td>ALBUMIN</td>
<td>4.3</td>
<td>3.0-5.0</td>
<td>g/dL</td>
</tr>
<tr>
<td>GLOBULIN</td>
<td>2.4</td>
<td>1.8-3.3</td>
<td>g/dL</td>
</tr>
<tr>
<td>BILIRUBIN TOT</td>
<td>0.7</td>
<td>0.2-1.3</td>
<td>mg/dL</td>
</tr>
<tr>
<td>BILIRUBIN DIR</td>
<td>0.2</td>
<td>0.2-0.4</td>
<td>mg/dL</td>
</tr>
<tr>
<td>BILIRUBIN IND</td>
<td>0.5</td>
<td>0.1-0.8</td>
<td>mg/dL</td>
</tr>
<tr>
<td>CHOLESTEROL</td>
<td>130</td>
<td>&lt; 200</td>
<td>mg/dL</td>
</tr>
<tr>
<td>MAGNESIUM</td>
<td>1.6</td>
<td>1.5-1.9</td>
<td>mg/dL/L</td>
</tr>
<tr>
<td>AST</td>
<td>20</td>
<td>0-45</td>
<td>U/L</td>
</tr>
<tr>
<td>ALT</td>
<td>13</td>
<td>0-45</td>
<td>U/L</td>
</tr>
</tbody>
</table>

**CHOLESTEROL (03/17/1999)**: Current
<table>
<thead>
<tr>
<th>Level</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Desirable</td>
<td>&lt;200 mg/dL</td>
</tr>
<tr>
<td>Borderline High</td>
<td>200-239 mg/dL</td>
</tr>
<tr>
<td>High</td>
<td>&gt;=240 mg/dL</td>
</tr>
</tbody>
</table>

L=LOW, H=HIGH, f=FOOTNOTE
**Case 18-2868, Document 283, 08/09/2019, 2628241, Page564 of 883**

**Patient Name:** ROBERTS, VIRGINIA L

**Cell Date:** 07/09/2001  
**Recvd Date:** 07/09/2001  
**Rpt Date:** 07/10/2001  
**Cell Time:** 1915  
**Recvd Time:** 1925  
**Rpt Time:** 0438

### ROUTINE CHEMISTRY

<table>
<thead>
<tr>
<th>TEST NAME</th>
<th>ABNORMAL</th>
<th>NORMAL</th>
<th>REFERENCE UNITS</th>
</tr>
</thead>
<tbody>
<tr>
<td>LD</td>
<td>188</td>
<td>30-225</td>
<td>U/L</td>
</tr>
<tr>
<td>ALKALINE PHOS</td>
<td>76</td>
<td>30-110</td>
<td>U/L</td>
</tr>
<tr>
<td>CORONARY RISK</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CHOLESTEROL</td>
<td>130</td>
<td>&lt; 300</td>
<td>mg/dL</td>
</tr>
</tbody>
</table>

**DESIABLE:** <200 mg/dL  
**BORDERLINE HIGH:** 200-239 mg/dL  
**HIGH:** ≥240 mg/dL

**CLIENT INFORMATION:**  
EDWING, STEPHEN D MD  
525 East 68th Street  
New York, NY 100210000  
Client #: 00000  
NEW YORK HOSPITAL
Case 18-2868, Document 283, 08/09/2019, 2628241, Page566 of 883

525 East 68th Street, New York, N.Y. 10021
M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York

Client#: 00000
NEW YORK HOSPITAL

Req#: 

Call Date: 07/09/2001  Rpt Date: 07/10/2001
Call Time: 1934  Rpt Time: 0638

TEST NAME

SENDOUT CULTURES

BLOOD GROUP AND TYPE

PROCEDURE: ABC RH

07/09/2001 1934 A POS

ANTIBODY SCREEN AND WORKUP

PROCEDURE: AMSC INT

07/09/2001 1934 NOTIMMED

CONFIDENTIAL

GIUFFRE603277
**Case 18-2868, Document 283, 08/09/2019, 2628241, Page 568 of 883**

**Patient Name:** ROBERSIS, VIRGINIA L.  

**Patient Information:**  
EMOND, STEPHEN D MD  
525 East 69th Street  
New York  

**Coll Date:** 07/09/2001  
**Coll Time:** 0941  
**Recvd Date:** 07/10/2001  
**Recvd Time:** 0941

<table>
<thead>
<tr>
<th>TEST NAME</th>
<th>ABNORMAL</th>
<th>NORMAL</th>
<th>REFERENCE</th>
<th>UNITS</th>
</tr>
</thead>
<tbody>
<tr>
<td>GC-CHLAMYDIA</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CHLAM SAMP SOURCE</td>
<td>CERVIX</td>
<td>NEGATIVE</td>
<td>NEGATIVE</td>
<td></td>
</tr>
<tr>
<td>GC SWAB</td>
<td>CERVIX</td>
<td>NEGATIVE</td>
<td>NEGATIVE</td>
<td></td>
</tr>
</tbody>
</table>

**Client #: 00000**  
**Client #: NY 100210000**  
**NEW YORK HOSPITAL**  

**Rpt Date:** 07/11/2001  
**Rpt Time:** 0452

**Page:** 1  
**END OF CHART**
**Patient Name:** ROBERTS, VIRGINIA L.

**CLIENT INFORMATION:**
- **EMOND, STEPHEN D MD**
- 525 East 68th Street
- New York, NY 10021

**Collected Date:** 07/09/2001
**Collected Time:** 1939
**Record Date:** 07/10/2001
**Record Time:** 0941

**TEST NAME**

<table>
<thead>
<tr>
<th>ABNORMAL</th>
<th>NORMAL</th>
<th>REFERENCE</th>
<th>UNITS</th>
</tr>
</thead>
</table>

**GENITAL CULTURE**
- **SOURCE:** CERVIX
- **DATE:** 07/10/2001

--- STAINS & PREPS ---

07/10/2001 1342

- MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI
- MODERATE EPITHELIAL CELLS
- MODERATE MBC SEEN
**GENITAL CULTURE - SCREEN**

**COLLECTED:** 07/09/01 1929

**RECEIVED:** 07/10/01 0941

**STARTED:** 07/10/01 0941

**ACCESSION #:** 01-MB-01-065532

--- **STAINS & PREPS ---**

07/10/2001 1342

**MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI**

**MODERATE EPITHELIAL CELLS**

**MODERATE WBC SEEN**

--- **PRELIMINARY REPORT ---**

07/11/2001 2037

**MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI**

**CULTURE BEING HELD FOR FURTHER EVALUATION**
<table>
<thead>
<tr>
<th>TEST NAME</th>
<th>ABNORMAL</th>
<th>NORMAL</th>
<th>REFERENCE</th>
<th>UNITS</th>
</tr>
</thead>
<tbody>
<tr>
<td>URINE CULTURE</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SOURCE: URINE CLEAN CATCH</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PRETEXT SOURCE:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**URINE CULTURE**

- **COLLECTED:** 07/09/01 1855
- **RECEIVED:** 07/10/01 1102
- **STARTED:** 07/10/01 1102

**ACCESSION:** 01-46-01-164573

- **FINAL REPORT:**

  **NO GROWTH (<1,000 CFU/ML)***

- **Rpt Date:** 07/12/2001
- **Rpt Time:** 0532

- **Coll Date:** 07/09/2001
- **Coll Time:** 1855

- **Recvd Date:** 07/10/2001
- **Recvd Time:** 1102

- **NEW YORK HOSPITAL**

- **Client #: 00000**

- **525 East 68th Street, New York, N.Y. 10021**

- **M. Desmond Burke, M.D., Laboratory Director**
**Genital Culture Screen**

**Source:** Cervix  
**Presumptive Source:**  

**Result:** Many gram positive bacilli consistent with lactobacilli  
**Moderate epithelial cells**  
**Moderate mucus seen**

**Preliminary Report:**

07/10/2001 1341  

Moderate gram positive bacilli consistent with lactobacilli  
Culture being held for further evaluation

07/12/2001 1330  

Moderate gram positive bacilli consistent with lactobacilli  
Culture being held for further evaluation

**Collection Date:** 07/09/2001  
**Received Date:** 07/10/2001  
**Report Date:** 07/13/2001  
**Report Time:** 0541

**Accession Number:** 01 MB 01-045532
Case 18-2868, Document 283, 08/09/2019, 2628241, Page575 of 883

525 East 66th Street, New York, N.Y. 10021
M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERIS, VIRGINIA L.

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 66th Street
New York, NY 10021
Client #: 00000
NEW YORK HOSPITAL

Coll Date: 07/09/2001
Recvd Date: 07/10/2001
Coll Time: 1929
Recvd Time: 0941

Rpt Date: 07/14/2001
Rpt Time: 0431

INST NAME | ABNORMAL | NORMAL | REFERENCE | UNITS

GENITAL CULTURE SCREEN

COLLECTED: 07/09/01 1929
RECEIVED: 07/10/01 0941
DIARIED: 07/12/01 0941
ACCESSION #: 01-MB-01-645332

--- STAINS & PREPS ---
07/10/2001 1342

MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI

MODERATE EPITHELIAL CELLS

MODERATE WBC SEEN

--- PRELIMINARY REPORT ---
07/11/2001 1037

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH
LACTOBACILLI

CULTURE BEING HELD FOR FURTHER EVALUATION

07/16/2001 1139

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH
LACTOBACILLI

CULTURE BEING HELD FOR FURTHER EVALUATION

--- FINAL REPORT ---
07/13/2001 1117

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH
LACTOBACILLI

NO NEISSERIA GONORRHEAE ISOLATED
**New York Presbyterian Hospital**

**New York Weill Cornell Medical Center**

---

**DIAGNOSTIC PROCEDURE ORDER FORM**

**CASE:** 18-2868, **Document:** 283, **08/09/2019**, **2628241**, Page 577 of 883

---

**CARDIOLOGY**

- **PRIORITY:** 8, 2, or 3
- **Fax:** 66701
- **Date:** 12/25/12
- **Time:** 10:30 AM

**DIAGNOSTIC PROCEDES:**

- Cardiac Catheterization
- CXR
- Echocardiogram
- Holter Monitor
- Stress Test
- PFTs

**RADIOLOGY**

- **PRIORITY:** 1, 2, or 3
- **Fax:** 66701
- **Date:** 12/25/12
- **Time:** 10:30 AM

**PROCEDURE:**

- Abdomen
- Chest
- Cystic Fibrosis
- Special
- Head
- Spine
- V/Q Scan
- Blood Vessels

---

**CLINICAL DATA**

- **Pediatric Patient:** Yes
- **Prep Info:** Abdominal
- **Date of Surgery:** 12/25/12
- **Clinical History:**

---

**ORDERING PHYSICIAN:** [Redacted]

**Attending MD:** [Redacted]

**RN Signature:** [Redacted]

---

**CONFIDENTIAL**

**GIUFFRE003288**
**PROCEDURE ORDER FORM**

Many of the Radiology examinations require that the patient be prepared for the procedure that is being ordered. We have included a brief description of the most common procedures. HOWEVER, all exams are included in the Manual of Laboratory, X-Ray, and Special Procedures and are contained in the Auxiliary Services section in this manual. The procedure in the manual contains a brief description, indications, contraindications, patient props and special instructions.

Please call Pediatric Radiology x88654 for modified props for pediatric cases.

**NOTE:** SEQUENCING of exams is critical when ordering multiple exams. Barium studies generally should be done after other diagnostic procedures. See Manual for more complete information or discuss with Radiologist so as not to delay patient care.

**G.I. Series**
- Prep: N.P.O. from midnight day before study. Some medication except essential. Antacids should be discontinued 24 hours before procedure.
- Aftercare: mild laxative and fluids.

**Barium Enema**
- Prep: Clear fluids 24 hours prior to study.
  - 60 ml magnesium citrate by mouth at 5 PM day before study.
  - 4 bisacodyl tablets (Dulcolax) by mouth at 9 AM the morning before exam.
  - 1 bisacodyl suppository morning of exam.
- Nothing by mouth after midnight.

**I.V.P. (Intravenous Pyelogram)**
- Prep: 10 ounces of magnesium citrate at 6 PM evening before exam.
- Nothing by mouth after midnight.

**C.T. (Head & Body)**
- Prep: Clear fluids 4 hours prior to study. Contrast injection requires the patient be N.P.O. for at least 4 hours prior to study. Patients must be cooperative and able to hold their breath for Body CTs.
- Aftercare: Patients receiving contrast should be hydrated.

**MRI**
- CONTRAINDICATIONS: 1. Patients over 300 lbs. 2. Patients with PACEMAKERS CANNOT BE DONE. 3. Patients with metal surgical clips and other prosthetic devices should consult with the Radiologist before ordering MRIs. 4. Claustrophobic and inability to remain still are also contraindications and sedation may be required. SEE MANUAL FOR COMPLETE DETAILS.

**Sonograms**
- PELVIC/OBSTETRICAL: Requires full bladder. Patient should drink water and maintain a full bladder.
- ABDOMINAL/AORTIC RENAL: Clear liquid diet for 24 hours prior to exam.

**Nuclear Medicine - SPECIAL CONSIDERATIONS**
1. To obtain an adequate study, patient must be able to lie quietly for up to one hour in supine position. Adequate hydration is absolutely necessary in the renographic patient.
2. For biliary, myocardial, cardiac, and any studies requiring injection, the patient must be fasting for a minimum of four hours prior to test.
3. Radioactive iodine is used for thyroid uptake and scanning. Do not schedule test if any of the following drugs or foods have been ingested within minimal time limits indicated:
   - Iodine Compound (IUgola Potassium Iodide, Kipro): 1-2 weeks
   - Seaweed, Ocean, vitamin pills, orange, riboflavin: 3-6 days
   - Diodrast, Hyphaqua (i.e., IVPs and arteriograms): 1-2 weeks
   - Priodax, Telepaque, etc. (i.e., gallbladder series): 3-6 months
   - Lipiodol (i.e., bronchograms): at least 6 months
   - Anti-thyroid drugs (i.e., Propylthiouracil, Tapazole): 7 days. If in preparation for urgent radioactive treatment, consultation is advised.
   - Thyroid substance (i.e., denudated thyroid, Thyroxine): 4 weeks
   - Triiodothyronine (Cytomel): 10-12 days.
   - If special circumstances require evaluation despite the above indications (contraindications), Nuclear Medicine physician consultation advised.

CONFIDENTIAL
<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Diagnosis</th>
</tr>
</thead>
<tbody>
<tr>
<td>7/9/01</td>
<td>1:45</td>
<td>q 1 hour, q 15 minutes</td>
</tr>
</tbody>
</table>

**Allergies:**
- [ ] Routine
- [ ] Bedrest

**Vital Signs:**
- [ ] Normal
- [ ] NP0

**Activity:**
- [ ] Routine

**IV:**
- [ ] Heptol
- [ ] Fluids

**Oxygen:**
- [ ] Nasal Cannula, Units
- [ ] Face Mask

**Precautions:**
- [ ] Airborne
- [ ] Droplet
- [ ] Wound/Skin

**Other:**
- [ ] Oxygen Monitor
- [ ] ECG
- [ ] Foley Catheter

**Medications, etc.:**
- [ ] Tetanus & Diphtheria Toxoids 0.5 cc IM

**Laboratory Studies:**
- [ ] Glucose
- [ ] Ca, P
- [ ] Amylase
- [ ] Cardiac Enzymes
- [ ] ESR
- [ ] Aspirin
- [ ] Serum Hgb
- [ ] Serum Hct
- [ ] Serum Creatinine

**Type & Screen:**
- [ ] Type & Cross
- [ ] Other

**Dispensed:**
- [ ] 7/9
- [ ] 7/9

**Lactose Intolerance:**
- [ ] Yes

**Order:**
- [ ] 7/9
- [ ] 7/9

**Progress Notes:**
- [ ] 7/9
- [ ] 7/9

**Orders:**
- [ ] 7/9
- [ ] 7/9

**Chief Complaint:**
- [ ] 7/9
- [ ] 7/9

**Final Diagnosis:**
- [ ] 7/9
- [ ] 7/9

**Referred To:**
- [ ] 7/9
- [ ] 7/9

**Signatures:**
- [ ] 7/9
- [ ] 7/9

**Confidential:**
- [ ] 7/9
- [ ] 7/9
EXHIBIT 34
(Filed Under Seal)
Not a problem but we have to continue rest of the interview at my house being that the children are not feeling well, you have got the only document s pertaining to my case. Look forward to seeing you this afternoon . Jenna

-----Original Message-----
From: Sharon.Churcher@mailonsunday.co.uk
Sent: Friday, 18 February 2011 7:25 AM
To: Virginia Giuffre

Hi there
Have been up all night writing. Won't have an opinion from our lawyer on how much can be published until London wakes up. The lawyers wanted internal FBI documents but I think the Justice Dept letter is all you have from the feds??? Anyway can I give you a call early afternoon? Maybe have a late lunch?

S

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Hi Sharon, my address is [REDACTED]. Call me back for the directions from Gosford and my hubby will lead the way from there.

-----Original Message-----
From: Sharon.Churcher@mailonsunday.co.uk
Sent: Saturday, 12 February 2011 2:10 AM
To: Virginia Giuffre
Subject: Agreements etc

Hi there,

Thank you again for your email.

We totally understand your concerns. Please don’t worry about anything. Whatever happens, we are bound by confidentiality unless you consent to an article in a formal contract signed by you.

Since I will be in the air by the time you wake up, can you email our Assistant Editor Sian James -- sian.james@mailonsunday.co.uk -- your lawyer’s information please?

Sian will arrange to get him whatever assurances he requires. We really want to make this work and of course we want to protect you.

We’ll be really grateful if your lawyer will provide us his cell phone number as we’d like to sort this all out asap. Meaning we would like to talk to him Saturday EST.

I will give you a call from Sydney. Fingers crossed we get over this last hurdle!

Best regards,
Sharon

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EXHIBIT 36
(Filed Under Seal)
The flight logs didn't come through properly, could you please resend them? Thanks - Jenna

-----Original Message-----
From: Sharon.Churcher@mailonsunday.co.uk
Sent: Saturday, 26 February 2011 7:56 AM
To: Virginia Giuffre
Subject: Re:

Can u look at the flight logs I just sent and see if any ring a bell re Virgin Is/Andrew orgy please?
S
X0

Hi shazza,
I am hoping it all goes well this a.m. please let me know when you know something. As far as other publications go, I am happy for your company to decide as long as I am not made out to be a vixen...you know my taste...he..he..!
Talk to you soon buddy! =) Jenna

-----Original Message-----
From: Sharon.Churcher@mailonsunday.co.uk
Sent: Saturday, 26 February 2011 6:46 AM
To: Virginia Giuffre

So far it is all looking good. Waiting for a comment from Andrew. Will let you know as soon as we get it.

Are there any publications to whom you do not want the piece syndicated? (You get 50 per cent of the proceeds).
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EXHIBIT 37
(Filed Under Seal)
EXHIBIT 38
(Filed Under Seal)
CASE HISTORY/ASSESSMENT PLAN

NAME: Virginia Giuffre  DATE: 6/9/11
ADDRESS:  [redacted]
PHONE NUMBERS:
(H)  [redacted] (W)  [redacted]  DOB: [redacted] PRIVATE HEALTH INS.
AGE: 26

FAMILY BACKGROUND/HISTORY

SINGLE (Not in a relationship)  
SINGLE (In a relationship)  NAME:  AGE: 
How long  Description of partner: 

DE FACTO RELATIONSHIP:  NAME:  AGE: 
How long  Description of partner: 

CHILDREN OF RELATIONSHIP:
SONS:  
DAUGHTERS:  
MARRIED:  Name:  Robak  AGE: 40  
How long  Description of spouse:  
Description of shared relationship:  

CHILDREN:
SONS:  [redacted]  
DAUGHTERS:  [redacted]  

PREVIOUS MARRIAGES/SIGNIFICANT RELATIONSHIPS

1. NAME:  HOW LONG:  
Reason relationship finished:  
CHILDREN:  

REFERRAL SOURCE:  Private C. Robak
FAMILY HISTORY:

MOTHER: **AGE** 51 **HEALTH**

MARITAL STATUS: MARRIED — SEPARATED — DIVORCED — REMARRIED

New partner: _______________________________

Relationship with mother: Self _______________________________

DESCRIPTION OF MOTHER: CARING — LOVING — NURTURING — POSITIVE

SUPPORTIVE — SENSITIVE — DOMINANT — NEGATIVE — CONTROLLING

MANIPULATIVE — DEPENDENT — SUBSTANCE ABUSE

ENVIRONMENTAL/GENERATIONAL FACTORS:

DESCRIPTION OF RELATIONSHIP:

CLOSE — VERY CLOSE — STRAINED — DISTANT — NON EXISTENT

FATHER: **AGE** 52 **HEALTH**

MARITAL STATUS: MARRIED — SEPARATED — DIVORCED — REMARRIED

NEW PARTNER: _______________________________

RELATIONSHIP WITH SELF: _______________________________

DESCRIPTION OF FATHER: CARING — LOVING — NURTURING — POSITIVE

SUPPORTIVE — SENSITIVE — DOMINANT — NEGATIVE — CONTROLLING

MANIPULATIVE — DEPENDENT — SUBSTANCE ABUSE

ENVIRONMENTAL/GENERATIONAL FACTORS:

DESCRIPTION OF RELATIONSHIP: CLOSE — VERY close — STRAINED

DISTANT — NON EXISTENT

SIBLINGS — BIOLOGICAL/STEP/BLENDED

BROTHERS

5 yrs younger

Sisters

1 child 4 yrs younger

Aunt 1st cousin

Relationship: Very close — close — distant — non-existent

DESCRIPTION OF FAMILY RELATIONSHIP: Very close — close — distant
CHILDHOOD/ ADOLESCENT HISTORY

Major illnesses/operations: Kidney problems

DESCRIPTION OF SELF AS A CHILD: BRIGHT — HAPPY — OUTGOING — LEADER —
COMPLIANT — LONER — UNHAPPY — HIGH ACHIEVER — TROUBLED —

DESCRIPTION OF SELF AS A TEENAGER: BRIGHT — HAPPY — OUTGOING — LEADER —
COMPLIANT — LONER — UNHAPPY — HIGH ACHIEVER — TROUBLED —

RELATIONSHIP WITH PEERS/TEACHERS

EDUCATIONAL HISTORY

School leaving year: HSC

Tertiary studies/University:

Studied: AT

Timespan

EMPLOYMENT HISTORY

Present position

Company: Length of time

Plans for the future

PREVIOUS POSITIONS

MEDICAL & PSYCHOLOGICAL HISTORY (ADULT)

Significant illnesses/operations/treatment

PRESENT GENERAL HEALTH

MEDICATION

Substance abuse: Alcohol — Nicotine — Other drug taking: Marijuana

PREGNANCY HISTORY: Number of pregnancies: 3

Miscarriages: 1st trimester

Terminations

(Effect/ reasonable/ bad/still affected by decision)

ANXIETIES/CONCERNS/FEARS

1. Flashbacks
2. Anxiety about safety from the family

10/10
PHOBIAS

DESCRIPTION OF PRESENT PROBLEM

TIME OF ONSET/SYMPTOMS

SLEEP PATTERNS: Good/holds asleep easily/ reasonable/poor/difficulty staying asleep/
Awakens through night/ unable to go back to sleep

AWAKENS FEELING: Good/fed/down/ Morning person/Night person

Awareness of mental disorder in family units/origin

MEMORY: Good/reasonable/poor -

SUICIDAL THOUGHTS: Thoughts only/serious/contemplation

Attempts and manner

Intervention

EPILEPSY: YES/NO

RELAXATION/INTERESTS (Hobbies recreational interests)
Walking/cooking/theatre/music/cinema/sport/walk walking/craft/woodwork

Shared with partner

Purpose meaning of life:

(H.Psych. Role/Emt/Enmt/Ent/Entd/Entk/Entps/Entp/self/Ks.-non-juj./W.dem.exp/figv.-uncnd./
diminished in .................................. claiming in .....................................)

Acknowledged - validation - recognition - - - - - - - - - - - -

HYMPSOSIS SUGGESTED .....................................Explanation/description of Hypnosis/Pamphlet

HYPNOTIC FORMAT: ..............Relaxation response/counting 1-20/Idenmotor/eye catalepsy/

HOW RECEPTIVE 1 2 3 4 5 6 7 8 9 10 APPROPRIATE FOR FUTURE WORK

TREATMENT PLAN/FOCUS:

Mindfulness-based care strategies for PTSD

Reframing of very damaged cognitions from past

Remodeling young woman - supportive therapy needed
Many issues from past - to take segments

piece by piece — unbelievable
paid $143 a month — raped
by an older man (coed agency).
Police involved.

Paused then went to California — raised
in Florida by an absent - left Air Force
back to Florida (group facility home)
A limo picked her up (Richmond) — sexual
was ‘violated’ around by him — he went
to jail.

Returned to parents' school. All is worked
as a locker room attendant/relief in massage
area/housemaid/exceptional.

Decided to be a massage therapist - went to
library to research anatomy — was approached
by Tina Christine Maxwell who said she could
help her get a job as a massage therapist.
Virginia's sister worked in maintenance at the hotel
who offered an interview (father knew as well)

Seemed respectable. Left impression good. V then
was upset — she was drawn now. To massage
etc. (deets epokey) told to undress.

Professor talked about back on person. Miss
Maxwell promised her $250 again (pressed
upon). Said 'that's what life is all about'.

they were rich so powerful - V was promised
a full massage certificate (later) to be
and away for training. place
had training manually on how to please
a man etc. still liked my parents back
DATE: 

PROGRESS:

Dep't in an apartment in New York.

Troubled — u. b. — OK — U. waited

to become qualified — was sent to Thailand.

A cheap train f. course in Manage.

Met [redacted] in Thailand who offered to manu

her a raise her ticket to Australia. Which

she liked.

More services required — PTSD.
EXHIBIT 39
(Filed Under Seal)
### Vehicle Information

**Case number:** 1-05-000368  
**Category:**  
**Year:** 0  
**Model:**  
**Permit Number:**  
**Color - Top:**  
**License #:**  
**Stolen value:** 0  
**Insured:**  
**Keys in car:**  
**Lein holder:**  
**Recovery value:** 0  
**NCIC number:**  

### Person Reporting Information

**Case Number:** 1-05-000368  
**Last Name:**  
**Street Number:**  
**City:**  
**Birth Date/Age:**  
**Occupation:**  
**Home Phone No:**  
**Sex:** Female  
**Height:** 0  
**Weight:** 0  

### Suspect/Arrestee Information

**Prompt valid in:** ROBSON, HALEY  
**Case Number:** 1-05-000368  
**Street Number:**  
**City:** ROYAL PALM BEACH, FL 334121460  
**Birth Date:**  
**Employer:**  
**Oper Lic No:**  
**Other Phone Nbr:**  
**Sex:** Female  
**Minimum Weight:** 0  
**Maximum Age:** 18  
**Occupation:**  
**Home Phone No.:**  
**Race:** White  
**Minimum Height:** 0  
**Maximum Height:** 0
Case No. ... 1-05-000368
Maximum Weight: 0
Aliases? ...
Hair Color ...
Hair Style ...
Glasses ...
Facial Hair ...
Teeth ...
Hat ...
Shirt ...
Shoes ...
Body Marks #2 ...
Body Marks #4 ...
Arrest Case No. ...

*************** SUSPECT / ARRESTEE INFORMATION - #2 **
Case Number: 1-05-000368
Street Number: 358 EL BRILLO WY
City: PALM BEACH, FL 00003480
Birth Date: [Redacted]
Employer? ...
Oper Lic No. ...
Other Phone Nbr: 561/000-0000
Sex: Female
Minimum Weight: 0
Maximum Weight: 0
Aliases? ...
Hair Color ...
Hair Style ...
Glasses ...
Facial Hair ...
Teeth ...
Hat ...
Shirt ...
Shoes ...
Body Marks #2 ...
Body Marks #4 ...
Arrest Case No. ...

*************** SUSPECT / ARRESTEE INFORMATION - #3 **
Case Number: 1-05-000368
Street Number: 358 EL BRILLO WY
City: PALM BEACH, FL 00003480
Birth Date: [Redacted]
Employer? ...
Oper Lic No. ...
Other Phone Nbr: Male
Sex: Male
Minimum Weight: 0
Maximum Weight: 0
Aliases? ...
Hair Color ...
Hair Style ...

Maximum Age: 25
Occupation: PERSONAL ASST/EPSTEIN
Home Phone No.: 561/000-0000
Race: White
Minimum Height: 0
Maximum Height: 0
Misc. ID#: 
MO/Crime Spec?
Hair Length ...
Eye Color ...
Complexion ...
Build ...
Speech ...
Coat ...
Pants ...
Body Marks #1 ...
Body Marks #3 ...
Status: STILL SUSPECT
Additional UCR? ...

Prompt valid in: KELLEN, SARAH LYNNELLE
Prompt valid in: EPSTEIN, JEFFREY
Date: 7/25/06  
Time: 8:47:53  

Case No. . . . : 1-05-000368  
Glasses . . . . :  
Facial Hair . . . :  
Teeth . . . . :  
Hat . . . . :  
Shirt . . . :  
Shoes . . . :  
Body Marks #2 :  
Body Marks #4 :  

*************** V I C T I M I N F O R M A T I O N - # 1  ***************

Case Number . . . : 1-05-000368  
Prompt valid in:  
Street Number . . . . :  
City . . . . . . :  
Birth Date/Age : STUDENT 16  
Occupation :  
Home Phone No. :  
Sex . . . . : Female  
Weight . . . : 0  
Be On Look Out? :  
Victim Type . . : JUVENILE  
Residency Sts :  
Can Identify . :  
Injury Extent :  
Injury Type 2 :  
Med Treatment :  
Phys Last Name :  

*************** V I C T I M I N F O R M A T I O N - # 2  ***************

Case Number . . . : 1-05-000368  
Prompt valid in:  
Street Number . . . . :  
City . . . . . . : PALM BEACH, FL 000033480  
Birth Date/Age : 18  
Occupation :  
Home Phone No. : 561/000-0000  
Sex . . . . : Female  
Weight . . . : 0  
Be On Look Out? :  
Victim Type . : ADULT  
Residency Sts :  
Can Identify . :  
Injury Extent :  
Injury Type 2 :  
Med Treatment :  
Phys Last Name :  

*************** V I C T I M I N F O R M A T I O N - # 3  ***************

Case Number . . . : 1-05-000368  
Prompt valid in:  
Street Number . . . . :  
City . . . . . . : PALM BEACH, FL 000033480  
Birth Date/Age : 16  
Employer? . . . . :  

GIUFFRE005616  
CONFIDENTIAL
Case No. . . . .: 1-05-000368
Occupation . . . . .: Oper Lic No . . . .:
Home Phone No. . . . 561/000-0000
Sex . . . . . . . . . .: Female
Weight . . . . . . . . 0
Be On Look Out?:
Victim Type . . . . .: JUVENILE
Residency Sts . . . . .:
Can Identify . . . . .:
Injury Extent . . . . .:
Injury Type 2 . . . . .:
Med Treatment . . . . .:
Phys Last Name . . . . .:

(Continued)

**VICTIM INFORMATION - # 4**

Case Number . . . .: 1-05-000368
Street Number . . . .:
City . . . . . . . . . .: PALM BEACH, FL 000033480
Birth Date/Age . . . .: 17
Occupation . . . . .: Employer?
Home Phone No. . . . 561/000-0000
Sex . . . . . . . . . .: Female
Weight . . . . . . . . 0
Be On Look Out?:
Victim Type . . . . .: JUVENILE
Residency Sts . . . . .:
Can Identify . . . . .:
Injury Extent . . . . .:
Injury Type 2 . . . . .:
Med Treatment . . . . .:
Phys Last Name . . . . .:

**VICTIM INFORMATION - # 5**

Case Number . . . .: 1-05-000368
Street Number . . . .:
City . . . . . . . . . .: PALM BEACH, FL 000033480
Birth Date/Age . . . .: 18
Occupation . . . . .:
Home Phone No. . . . 561/000-0000
Sex . . . . . . . . . .: Female
Weight . . . . . . . . 0
Be On Look Out?:
Victim Type . . . . .: ADULT
Residency Sts . . . . .:
Can Identify . . . . .:
Injury Extent . . . . .:
Injury Type 2 . . . . .:
Med Treatment . . . . .:
Phys Last Name . . . . .:

**VICTIM INFORMATION - # 6**

Case Number . . . .: 1-05-000368
Prompt valid in: [redacted]

Case No. . . . : 1-05-000368
Case Number . . . : 1-05-000368
Street Number . . . :
City . . . . . . . : PALM BEACH, FL 000033480
Birth Date/Age . . . : 17
Occupation . . . . . . . :
Home Phone No. . . . : 561/000-0000
Sex . . . . . . . : Female
Weight . . . . . . . : 0
Be On Look Out? . . . :
Victim Type . . . . . . . : JUVENILE
Residency Sts . . . . . :
Can Identify . . . . . . . :
Injury Extent . . . . . . :
Injury Type 2 . . . . . . :
Med Treatment . . . . . :
Phys Last Name . . . . . :

*************** V I C T I M I N F O R M A T I O N - # 10 ********************
Case Number . . . : 1-05-000368
Prompt valid in: [Redacted]
Street Number . . . :
City . . . . . . . : PALM BEACH, FL 000033480
Birth Date/Age . . . : [Redacted]
Occupation . . . . . . . :
Home Phone No. . . . : 561/000-0000
Sex . . . . . . . : Female
Weight . . . . . . . : 0
Be On Look Out? . . . :
Victim Type . . . . . . . : JUVENILE
Residency Sts . . . . . :
Can Identify . . . . . . . :
Injury Extent . . . . . . :
Injury Type 2 . . . . . . :
Med Treatment . . . . . :
Phys Last Name . . . . . :

*************** V I C T I M I N F O R M A T I O N - # 11 ********************
Case Number . . . : 1-05-000368
Prompt valid in: [Redacted]
Street Number . . . :
City . . . . . . . : PALM BEACH, FL 000033480
Birth Date/Age . . . : [Redacted]
Occupation . . . . . . . :
Home Phone No. . . . : 561/000-0000
Sex . . . . . . . : Female
Weight . . . . . . . : 0
Be On Look Out? . . . :
Victim Type . . . . . . . : ADULT
Residency Sts . . . . . :
Can Identify . . . . . . . :
Injury Extent . . . . . . :
Injury Type 2 . . . . . . :
Med Treatment . . . . . :
Case No. . . . : 1-05-000368
Phys Last Name : 

**************** VICTIM INFORMATION - # 12 ****************
Case Number .: 1-05-000368
Street Number :
City . . . . . . : PALM BEACH, FL 000033480
Birth Date/Age .: [Redacted]
Occupation .: 
Home Phone No. : 561/000-0000
Sex . . . . . . : Female
Weight . . . . : 0
Be On Look Out? : 
Victim Type : ADULT
Residency Sts :
Can Identify :
Injury Extent : 
Injury Type 2 :
Med Treatment :
Phys Last Name :

**************** VICTIM INFORMATION - # 13 ****************
Case Number .: 1-05-000368
Street Number :
City . . . . . . : PALM BEACH, FL 000033480
Birth Date/Age .: [Redacted]
Occupation .: 
Home Phone No. : 561/000-0000
Sex . . . . . . : Female
Weight . . . . : 0
Be On Look Out? : 
Victim Type : JUVENILE
Residency Sts :
Can Identify :
Injury Extent :
Injury Type 2 :
Med Treatment :
Phys Last Name :

**************** VICTIM INFORMATION - # 14 ****************
Case Number .: 1-05-000368
Street Number :
City . . . . . . : PALM BEACH, FL 000033480
Birth Date/Age .: [Redacted]
Occupation .: 
Home Phone No. : 561/000-0000
Sex . . . . . . : Female
Weight . . . . : 0
Be On Look Out? : 
Victim Type : JUVENILE
Residency Sts :
Can Identify :
Injury Extent :
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<tr>
<th>Date</th>
<th>7/25/06</th>
</tr>
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<tbody>
<tr>
<td>Time</td>
<td>8:47:53</td>
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<tr>
<td></td>
<td>PALM BEACH POLICE DEPARTMENT</td>
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<tr>
<td></td>
<td>Incident Report</td>
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<td>1-05-000368</td>
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<td>Med Treatment</td>
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<td>Phys Last Name</td>
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**VICTIM INFORMATION - # 15**

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<td>City</td>
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<td>Birth Date/Age</td>
<td>19</td>
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<td>Home Phone No.</td>
<td>561/000-0000</td>
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<td>Sex</td>
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<td>Weight</td>
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**VICTIM INFORMATION - # 16**

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<td>Home Phone No.</td>
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<td>Sex</td>
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**VICTIM INFORMATION - # 17**

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<td>Home Phone No.</td>
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<td>Residency Sts.</td>
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</table>

**CONFIDENTIAL**

GIUFFRE005621
Palm Beach Police Department

Incident Report

Case Number: 1-05-000368

Date: 7/25/06
Time: 8:47:53

Victim Sobriety:

Injury Extent:

Injury Type 1:

Hospital ID:

Phys First Name:

(Continued)

Other Person Information - # 1

Case Number: 1-05-000368
Street Number: [Redacted]
City: WEST PALM BEACH, FL 33411
Birth Date/Age: 14
Occupation: STUDENT
Home Phone No: [Redacted]
Sex: Female
Weight: 0
Other Phone Nbr: [Redacted]

Other Person Information - # 2

Case Number: 1-05-000368
Street Number: 358 EL BRILLO WY
City: PALM BEACH, FL 33480
Birth Date/Age: 19
Occupation: [Redacted]
Home Phone No: [Redacted]
Sex: Female
Weight: 0
Other Phone Nbr: [Redacted]

Other Person Information - # 3

Case Number: 1-05-000368
Street Number: [Redacted]
City: ROYAL PALM BEACH, FL 33411
Birth Date/Age: 35
Occupation: [Redacted]
Home Phone No: [Redacted]
Sex: Female
Weight: 0
Other Phone Nbr: [Redacted]

Other Person Information - # 4

Case Number: 1-05-000368
Street Number: [Redacted]
City: [Redacted]
Birth Date/Age: 37
Occupation: PAINTER
Home Phone No: [Redacted]
Sex: Male
Weight: 0
Other Phone Nbr: [Redacted]

Other Person Information - # 5

Case Number: 1-05-000368

Last Name: [Redacted]

Employer?: [Redacted]
Oper Lic No.: [Redacted]
Race: White
Height: 5'10
Person Type: OTHER PERSON

Other Person Information - # 6

Case Number: 1-05-000368
Street Number: [Redacted]
City: [Redacted]
Birth Date/Age: 37
Occupation: [Redacted]
Home Phone No: [Redacted]
Sex: [Redacted]
Weight: 0
Other Phone Nbr: [Redacted]

Other Person Information - # 7

Case Number: 1-05-000368
Street Number: [Redacted]
City: [Redacted]
Birth Date/Age: 37
Occupation: [Redacted]
Home Phone No: [Redacted]
Sex: [Redacted]
Weight: 0
Other Phone Nbr: [Redacted]
Case No. . . . : 1-05-000368
Street Number : 
City . . . . : 
Birth Date/Age : 0/00/0000 0
Occupation . . : FAMILY THERAPIST
Home Phone No. : 561/000-0000
Sex . . . . : Female
Weight . . . : 0
Other Phone Nbr. : 561/000-0000

(Continued)

***EMPLOYER INFORMATION***
Case Number . : 1-05-000368
Employer Name : PBC DIVISION OF YOUTH AFFAIRS
Address . . . : 4200 N AUSTRALIAN AV
City/State/Zip : WEST PALM BEACH, FL 33407
Phone Number . : 561/840-4540

******************** OTHER PERSON INFORMATION - # 6 ********************
Case Number . : 1-05-000368
Street Number : 
City . . . . : WELLINGTON, FL 33414
Birth Date/Age : 00/00/0000 0
Occupation . . : STUDENT
Home Phone No. : 561/000-0000
Sex . . . . : Male
Weight . . . : 0
Other Phone Nbr. : 

***EMPLOYER INFORMATION***
Case Number . : 1-05-000368
Employer Name : SUMMIT CHRISTIAN SCHOOL
Address . . . : 4900 SUMMIT BV
City/State/Zip : WEST PALM BEACH, FL 33415
Phone Number . : 

******************** OTHER PERSON INFORMATION - # 7 ********************
Case Number . : 1-05-000368
Street Number : 
City . . . . : 
Birth Date/Age : 0/00/0000 0
Occupation . . : 
Home Phone No. : 561/000-0000
Sex . . . . : Male
Weight . . . : 0
Other Phone Nbr. : 

******************** OTHER PERSON INFORMATION - # 8 ********************
Case Number . : 1-05-000368
Street Number : 
City . . . . : 
Birth Date/Age : 0/00/0000 0
Occupation . . : 
Home Phone No. : 561/000-0000
Sex . . . . : Female
Weight . . . : 0
Other Phone Nbr. : 

GIUFFRE005823
CONFIDENTIAL
On 03/14/2005, I received a call from a woman who did not wish to identify herself (later identified as [redacted]). She stated that her fourteen year old step daughter (later identified as [redacted]) possibly may have been molested in Palm Beach by a wealthy man. According to [redacted], she learned of the possible molestation by a third party. She explained that she had received a call from the mother of her stepdaughter’s friend. The mother claimed to have overheard a conversation between her daughter and a male friend; they were talking about [redacted]. The conversation was about how [redacted] had met with a 45-year-old man and had sex with him and was paid for it. I advised [redacted] that I would like to meet with her to obtain a more detailed statement and facts. [redacted] stated she did not know what to do and had to discuss the matter with her husband. At this point [redacted] did not provide me with a call back number or any other information. She stated that she would contact me once she had spoken with her husband and [redacted]’s mother.

On 03/14/2005 received a call from Mr. & Mrs. [redacted]. They stated it was all right to speak to their daughter [redacted] via cell phone [redacted]. Her mother [redacted] had been made aware of the case. They agreed to meet me at the police department later this date.

On 03/14/2005, Mr. [redacted] accompanied by his wife [redacted] came to the Palm Beach Police Department where they advised me that they believed their fourteen year old daughter may have had some type of sexual relationship with an older male who resided in Palm Beach. Neither knew the suspect’s name or address. Both stated that their daughter did not talk to them about the incident, nor would she admit to it.

Please identify his daughter as [redacted] w/f, DOB [redacted] resides with her biological mother [redacted] at [redacted]. [redacted] is a twin.
her sister resides with Mr. . Both and are currently attending school, which is an involuntary admitted juvenile educational facility. stays at the facility during the week and comes home on the weekend. According to she was admitted to the school because of disciplinary problems that recently escalated. The facility also coordinates with the families to provide one on one as well as family counseling.

According to Mrs. , she believes the incident occurred on Sunday, December 2005. A friend of 's, named Haley, picked her up at their house and left. They believe Haley initiated the relationship with the older gentleman, though they do not have any proof. Haley lives close by with her mother. Mrs. further explained that was introduced to Haley by a boy she was dating (goes to and plays baseball). Mrs. continued that on Sunday, Haley picked up and drove to Palm Beach where they met the man. Supposedly, the man has a lot of money and often has young girls come over to his house. Haley offers these girls a way to make fast cash. The man starts with a massage. If he likes them, he keeps them around and does more. The did not have any information on Haley other than she lives on the last house on right side (north side).

Mrs. talked of a conversation that she had with , the mother of , a former friend of 's. She found it strange that they were no longer friends until she received the call from her mother telling her of the conversation she overheard between and a boy named .

Mrs. told me of an incident that occurred on 02/09/2005. got into a fight at school . Mrs. , Assistant Principal, found over $300.00 in her purse and gave different explanations for the large sum of money. Initially the school administration thought it was drug related but then dismissed the claim. Since that day, did not return to school; she ran away Thursday, 02/10th or Friday 02/11 and returned to her mother's house later that night after midnight. It was not until after received the call from her mother, that she learned was the girl that got into the fight with . The fight was instigated when accused of being a prostitute.

who has legal joint custody of his daughter signed the affidavit of prosecution indicating he wished to prosecute against the inappropriate sexual behavior with his fourteen-year-old daughter.

stated that he had no objections with our agency speaking with his daughter about the incident. stated that is mother is aware of the allegations and also was willing to cooperate. According to she does not believe her daughter had any additional contact with the suspect as she was with.
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I contacted the School Board Police who provided me the information for: [name redacted] West Palm Beach, Florida. Checking the school board records for [name redacted] and [name redacted] there was no disciplinary record found. I was advised if no disciplinary action was taken for a fight, such as an expulsion or detention, the incident may not have been recorded. This was at the discretion of the individual school security and principal.

03/15/2005, I called the Palm Beach County Sheriff's Office and left a message for PBSO Sgt. Chris Keen, Child Abuse Unit.

On 03/15/2005, I went to [redacted] where I met with white female [redacted] Also present was [redacted's] therapist. During an audiotaped interview, I spoke with [redacted] about the allegations that were made. [redacted] initially denied anything had happened, only admitting to going with Haley (later identified as Haley Robson) to Palm Beach to pick up money Robson was owed. [redacted] identified Haley Robson as the cousin of her former boyfriend [redacted]. She ultimately admitted to knowing that Robson worked for a wealthy man and possibly did sexual favors for him. She also admitted that Robson had offered her an opportunity to make money.

[Redacted] identified Robson's boss as a white male named "Jeff" who lived in Palm Beach (later positively identified as Jeffrey Epstein). [Redacted] explained that she was first approached by Robson to go with her to Jeff's house, when they were at [redacted]'s house. According to [redacted] she was not sure exactly what was going on with Robson but agreed to go with her. [Redacted] (Jeff's boyfriend) became angry when he heard Robson inviting [redacted] to accompany her. [Redacted] believed it was to pick up money the man owed Robson. [Redacted] stated Robson told her that she would pick her up at her house on Sunday. [Redacted] was not sure of the exact dates but knew it was a Sunday. According to [redacted], Robson along with an unknown, possibly Hispanic female, picked her up at her father's house on [redacted]. [Redacted] told her father that they were going shopping. It was later confirmed by [redacted] that Robson picked his daughter up. According to Mr. [Redacted], Robson drove a pick up truck.

Robson drove along with the unknown female to Palm Beach. Sometime on the way there, a conversation occurred between Robson and [redacted] whereby Robson told [redacted] that if Jeff asked her age, she should say she was eighteen.

[Redacted] recalled that Jeff's house was on a dead-end street. All three girls walked up a driveway, past what appeared to be a small guard/security room. In fact, [redacted] recalled a male approaching them asking what they wanted. Robson stated they were there to see Jeff. The male allowed them to continue walking up to the house.
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The man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly after, Epstein and a woman, described as white with blond hair entered the kitchen. Epstein believed the woman was Epstein's assistant. He added that the woman did not seem friendly and kept her responses short and direct. Epstein introduced himself to the woman as Jeff. He got the impression that Epstein and Robson's friend knew each other. Described Epstein as being approximately forty-five years old, a long face, and bushy eyebrows, with graying hair.

Robson and Epstein left the kitchen leaving and Robson's friend alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. While speaking to me, Epstein became upset and started to cry. The woman instructed her to follow her upstairs, which she did. According to the woman led her to a room that had a massage table in it. The woman started to fix up the room, putting the covers on the table and taking lotions out. She then told Epstein that Epstein would be up in a second. The woman left the room, and soon after, Epstein walked in and told her to take off her clothes. Epstein was telling me what had happened, she looked away from me, and with a pointed finger, repeatedly pressed it into her thigh. Epstein stated he was stern when he told her to take off her clothes. She said she did not know what to do as she was the only one there. Epstein took off her shirt leaving her bra on. Epstein, dressed in a towel told her to take off everything. Epstein stated she removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. Epstein laid on the table, face down. Epstein began to give Epstein the massage, he told her to get on his back. Epstein stated she straddled herself on Epstein's back. Epstein stated her exposed buttocks were touching Epstein's bare buttocks. Epstein was giving Epstein the massage, he turned around, and wacked off. He later explained that wacking off was masturbating. Epstein stated she was disgust by Epstein's actions but did not say anything. According to Epstein told her that she "had a really hot body." Epstein excused himself and went to the bathroom where she believed he masturbated again. Epstein returned to the room and told her that he was done and gave her three hundred dollars. They went back down stairs where they met Robson. Epstein said goodbye and they left. Robson asked how did it go and asked what did she do. When Epstein told Robson that Epstein asked for a massage, Robson allegedly stated "I know." Robson stated they then went shopping. Epstein stated Robson also got paid, but that she did not know why since she was confident that Robson did not do anything.

Described Epstein's house as a two story pink house with a Cadillac Escalade parked in the driveway. There were gates leading into the property. From the kitchen, recalled walking up a flight of stairs, lined with photographs, to a room. Upon entering...
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the room there was a large bathroom to the right. [REDACTED] recalled a hot pink and green sofa in the room. There was a door on each side of the sofa. [REDACTED] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf.

[REDACTED] stated Epstein did not change in front of her but did take off his towel, exposing himself. [REDACTED] recalled Epstein being hairy especially on his chest. Epstein also had a hairline that continued to his buttocks. [REDACTED] admitted to seeing his penis. I asked [REDACTED] if she knew what being circumcised meant and she stated no. [REDACTED] then said that she thought Epstein was on steroids because he was a "really built guy and his wee wee was very tiny." [REDACTED] would explain that when she stated "wee wee" she meant penis. [REDACTED] stated Epstein exposed himself when he took his towel off, placing it on the floor as he laid down on the table.

[REDACTED] said Epstein was specific in his instruction to her on how to massage, telling her to go clockwise, etc. [REDACTED] recalled that Epstein got up from the table and went to the bathroom where she heard him making, what she believed to be sexual type of noises (moaning) He then returned to the room where he again laid down on the table. Epstein then turned over and instructed [REDACTED] to massage his boobs. As she did this, Epstein continued to make moaning noises.

[REDACTED] resumed massaging his chest area. [REDACTED] was now standing on the ground. Epstein turned to his side, and with the towel on the ground started to rub his penis in an up and down motion. [REDACTED] stated Epstein held on to the small of her back as she massaged his chest, back and shoulder area. [REDACTED] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. [REDACTED] also recalled Epstein having a noticeable freckle on his chest.

Epstein then left the room and [REDACTED] got dressed. She went back downstairs where she met Haley and the unknown white female. [REDACTED] admitted to getting paid three hundred dollars in cash from Epstein. Before they left, Epstein asked [REDACTED] to leave her phone number. As they were leaving the house, Haley asked [REDACTED] what had happened and how much she was paid. [REDACTED] stated Haley seemed upset or jealous when she told her that she received three hundred dollars. Haley stated received only two hundred dollars that day. [REDACTED] stated that she believed Haley was paid two hundred dollars for bringing her.

Robson told [REDACTED] that if they do this every Saturday, they could be rich; [REDACTED] agreed. They then went shopping, though she is not sure where. Possibly at TJ Maxx or Marshall's. [REDACTED] stated she never saw Robson again as she got into a fight at school. She had not spoken with Robson either as her mother took away her cell phone.

I asked [REDACTED] if she was aware of any video equipment while she was in the room. She stated no.
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[Redacted] stated she was afraid that Robson would retaliate against her or her family if she ever went to the police regarding the incident. [Redacted] stated that her father's vehicle was recently vandalized. [Redacted] admitted to telling [Redacted] what had happened with Epstein. According to [Redacted], became angry and upset, punching a hole in the wall. [Redacted] guessed that it was [Redacted] who told [Redacted] about the incident, and now there were rumors in school about [Redacted] and what she did with Epstein.

I then talked to [Redacted] about truth and lying. We talked about the color sweater she was wearing. [Redacted] denied having sexual intercourse with Epstein. She denied touching his penis. [Redacted] again admitted to observing Epstein masturbate.

[Redacted] agreed to cooperating with the police department in placing a phone call to Robson in a controlled setting. I met with Ms. [Redacted] and advised her of the families' as well as [Redacted]'s willingness to cooperate with this investigation. Copies of this interview were placed into evidence.

I made contact with [Redacted], mother of [Redacted]. I advised her briefly of my investigation. She was aware of the incident and stated that she overheard a portion of a conversation that her daughter was having with a boy named [Redacted]. [Redacted] stated that it was her opinion that both girls liked [Redacted]. [Redacted] recalled hearing her daughter calling [Redacted] a whore. [Redacted] admitted that she did not listen to the entire conversation but did confront her daughter about it later. [Redacted] told her mother that something to the effect that [Redacted] had slept with an older man for money. [Redacted] stated that she would not object to me speaking with her daughter. It was [Redacted]'s belief that everyone in the school may have known about this because of the fight that her daughter [Redacted] and [Redacted] had gotten into. I reminded [Redacted] that this was an ongoing investigation and requested she not discuss the fact that I had contacted her. She agreed.

On 03/16/2005, PBSO Sgt. Chris Keen left a message that he was returning my call. I spoke with Keen and discussed the case with him and inquired if he had any open allegations or cases where the suspect resided in Palm Beach. Keen stated he was unaware of any. Keen offered any assistance if needed. Keen stated it was his experience that due to the age of the parties involved, it would be difficult to interview them and expect the investigation to remain confidential.

Because of the time delay, there was no need for the victim to be taken to a medical facility for a physical for the purpose of obtaining evidence. There was also no need to take her to CPT as she was already in a juvenile facility, with an assigned therapist, in which coordinating a day and time to obtain a statement could be made.

On 03/17/2005, I queried Jeffrey Epstein on the internet and obtained
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(Continued)
a photo of Epstein to be used in a photo line up. I met with [redacted] at which time she viewed the photo line up. She immediately recognized Epstein and pointed to him (Position #5). [redacted] signed the photo line up under Epstein’s picture. This signed line up was placed into evidence.

On 03/18/2005, I met with [redacted] at her residence for the purpose of placing a controlled call to Haley Robson. [redacted] spoke with Robson and asked if she could arrange another meeting with Jeff. Robson stated that she would have to call him and make the arrangements. A copy of this conversation was placed into evidence.

03/19/2005, I spoke with [redacted] and [redacted] and was advised that [redacted] left the state to visit with her aunt and uncle. [redacted] is scheduled to return to Florida on 03/27/2005

03/21/2005, I coordinated with PS BSF Unit and OCVAN to initiate surveillance on 358 El Brillo.

03/21/2005, Coordinated with Det. Lee regarding trash pulls from 358 El Brillo. On this same date I called [redacted] to schedule an appointment to speak with [redacted]. She stated the school guidance counselor was reluctant to have police presence at the school. I assured her that I would respond to the school in civilian clothes and an unmarked vehicle.

[redacted] called me back and advised that I did not need to make an appointment to see [redacted].

I received a return phone call from [redacted] stating that [redacted] would be attending the family therapy sessions with [redacted].

I received messages from [redacted].

I conducted a computer query on Epstein. The results of this query indicated the most recent driver’s license on file for Epstein was for the state of Florida, which had expired.

A cross reference of Epstein’s residence, 358 El Brillo, Palm Beach, revealed the following affiliated names: Nada Marcinkova, w/f, dob [redacted] Mark L. Epstein, w/m dob [redacted] & Ghislaine N. Maxwell, w/f, dob [redacted]. A computer query for both returned no history.

On 03/23/2005, I spoke with [redacted] on cell phone wk [redacted]. I requested that she not discuss the incident with anyone including her daughter [redacted] as I did not want the investigation compromised. I was told at this time, that [redacted] and [redacted] have not been getting along due to the fact that [redacted] has decided to continue living with her father.

On 03/29/2005, I placed telephone calls to both the [redacted] and [redacted] residences requesting to speak with them regarding the
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I received return phone calls from Mrs. [redacted] and Mrs. [redacted] and advised them that I would be contacting [person], s family therapist to coordinate a time to meet with [person]. This was at the request of both [person] and Mrs. [redacted] that [person]'s strict classroom and therapy schedule be disrupted as little as possible. I also updated them to the investigation thus far. Both [person] and [person] stated they had no objection to my meeting with [person].

During my contact with Ms. [redacted], she identified the cell phone number of [redacted] as being the phone assigned to [person]. Ms. [redacted] had no objections and provided consent to giving it to the police department for the use of placing controlled phone calls from it. [person] stated the phone had been taken away from [person] as part of her punishment for not doing well in school. According to [person], she used to be an excellent student, but in the past two months has become irritable, verbally abusive to the family and has run away. [person] stated her daughter's recent behavior is the opposite of what she normally is. [person] stated they are going through family therapy sessions with the school but none of this had come up. Arrangements were made for Det. Captain Gudger to retrieve the cell phone from [person] at her place of employment.

I called [person] and requested to speak with Ms. [redacted]. Upon speaking with Ms. [redacted], she advised me that she was in the middle of therapy sessions and would call me back once the sessions were completed. Ms. [redacted] stated the sessions should be concluded by 7:00 PM. At approximately 8:00 PM I called Ms. [redacted] at the time I left a message on her voice mail requesting a return phone call. I spoke with Ms. [redacted] and advised her that I did not meet with her daughter and that I would again attempt to coordinate a time with the counselor so as not to disrupt [person]'s school schedule. Ms. [redacted] had no objections. Shortly after speaking with Ms. [redacted], I reviewed [person]'s schedule and advised that [person] would be available after 3:00 PM.

On 03/30/2005, I met with Ms. [redacted] and [person] at [person]'s home. During this time [person] initiated a conversation with me in which she admitted that she was not telling me everything that had happened during the time she was alone with Epstein. According to [person], while she and Epstein were alone on the second floor, Epstein used a purple vibrator to massage her vaginal area. [person] stated there was no penetration as the vibrator was on top of her underwear. I asked [person] if Epstein ever asked her age and she stated he had. [person] stated she told him she was eighteen. When Epstein asked what school she was in, [person] responded she was in the twelfth grade at Wellington. During the course of this incident, [person] stated Epstein told her that Haley had worked for him for years.

We then continued with the controlled call to Robson. At approximately 3:35 PM, [person] from her cell phone, made a call to Robson's home, [redacted]. Robson was not home. [person] was told...
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that Haley Robson was at working a double and could be reached on her cell phone. Haley Robson is employed at The Olive Garden Restaurant, located on Forest Hills Blvd in Wellington.

Robson called Robson. During the conversation between Haley Robson and Robson asked what happened, stating that she had heard rumors that was going to press charges. Robson asked if they, meaning parents, knew about Jeffery. Robson claimed to have heard that 's father had found out about Jeffrey. Told Robson that they (her parents) did not know anything about Epstein. Robson told that Epstein needed someone to work tomorrow and asked if she was available. Robson stated she would call Epstein and then call back.

During the course of these conversations with she would at times appear to be articulate and well spoken. She would then start to act in an immature manner, by looking around, not paying attention, drawing on a paper. Would offer me a high five whenever she claimed to have told me the truth in the details of the afternoon at Epstein's house. Would sit in the chair, with her knees propped up to her chest as she admitted that she did not tell me the all the details of her encounter with Epstein during our first meeting. As a means of positive reinforcement I would high five

On 03/31/2005, subpoena requests for T-Mobile Wireless and Cingular Wireless, (Robson and phone numbers) were drafted.

On 04/01/2005, I met with members of PB BSF Unit for the purpose of conducting surveillance on 358 El Brillo. Cross-reference supplement.

On 04/01/2005, I met with Det. Kruel of the Palm Beach Police Department who made me a copy of the concealed weapons permit for Mr. Epstein. It revealed Epstein had a valid permit. There was no current photo attached to the renewal notice.

On this same date I queried various different web sites for a possible identification of the purple item retrieved from the trash pull from 358 El Brillo. The item was similar in description as the one described by and used by Epstein.

I made contact with Spicygear.com and spoke with the owner John. I emailed a photograph of the item for his opinion. He identified the items as a Jelly Anal Wand of some sort. The item is easily available at sex shops in South Florida.

04/06/2005, I conducted business queries into Epstein utilizing the internet. I located articles relating to financial reports. There was no local history.

On 04/01/2005 - 04/03/2005, with the assistance of BSF, there was
Date: 7/25/06  
Time: 8:47:53  

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continued surveillance on the property.

On 04/04/2005, I obtained a copy of voice mail messages, dated 03/31 and 04/01 from Haley Robson to [redacted]. A female identifying herself as Haley states that she could pick up to take her to Epstein's house for an eleven o'clock appointment. A copy of this was placed into evidence.

On 04/05/2005, a trash pull was conducted at 358 El Brillo by Det. Lee and me. There were several messages written on various forms of paper. There was a message from Haley, indicating 11:00. The following was additional information obtained from trash retrieved from 358 El Brillo: Jean Luc 5:20 AM; David [redacted]; Sarah Kellen [redacted]; Friday 5:30 PM; Haley; a message receipt dated 4/4 1:05-25. She is looking to speak to you.

On 04/06/2005, I faxed subpoena requests to SA Mighdoll's office for Epstein, Robson and [redacted]'s phone records. (Phone numbers [redacted].)

On 04/06/2005, I called [redacted] Ext [redacted] and spoke with Principal [redacted]. He confirmed that they had a student by the name of [redacted]. He requested a written request prior to releasing any additional information. On this same date I faxed a request for student and parent information on [redacted]. I advised [redacted] that due to this being an open investigation he was not to discuss the matter with anyone.

On 04/08/2005, I received a message from [redacted] providing me the following information: [redacted] w/m DOB [redacted] Wellington, Florida. Parents: [redacted].

Det. Lee provided me with trash obtained from 358 El Brillo for 04/07/05. The following information was retrieved: Jet Aviation [redacted]; Itinerary, indicating a departure date of 04/05/2005 at 4:00 PM with an arrival in New York City of 6:15PM. Flight crew captain David Rodgers, co-captain, Larry Visoski, flight engineer Larry Morrison. Call sign N908JH; a note stating Bye J. thank you [redacted]; hand written notes & messages 11-Glenn. 12:30 chicken, & 3 September B & J, Big Screen x8, [redacted] work Sunday @ 4PM. Monday after school? left message for [redacted] works 4-9 Monday and Tuesday, leaves school @ 11:30 AM; [redacted] will be here tomorrow @ 10:30 AM; Mrs. Business [redacted]. There was no trash for 04/08/05.

04/22/05 received the results of a subpoena request from BellSouth for [redacted]. The results only provided subscriber information. I contacted Alice Grant Investigative Subpoena Compliance Center who stated the request was not complete and the results would be sent to
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(Continued)

me as soon as the query was finished.

Cross-referencing the names [redacted] and [redacted] as well as phone numbers, which were obtained from message notes via trash pulls, I identified the before mentioned individuals as being acquainted with someone at 358 El Brillo. [redacted] DOB 11/19/1986 FL DL [redacted] and [redacted] DOB 02/07/1986 FL [redacted] are both above the legal age of consent.

On 05/03/2005, I spoke with [redacted] and updated her on the investigation. [redacted] stated that [redacted] was doing well in the school. Her contact with the outside is limited as they do not have access to the phones. [redacted] comes home on the weekends and she is not allowed to go anywhere alone.

On 05/11/2005, I made arrangements to meet with [redacted] and [redacted].

On Thursday, 05/12/05, I spoke with [redacted] regarding the case. They will be moving to GA in July 2005. They will be very busy over the next few weeks but would be available via phone. Will coordinate a date to meet to discuss the matter further.

During this week I conducted surveillance at Epstein’s residence and at the airport, but there was nothing to indicate that Epstein was in town.

Due to conflicting appointments, rescheduled until 06/02/2005, to meet with Ms. [redacted]

I also spoke with [redacted] and updated her to the investigation.

On 06/02/2005, I met with [redacted] and [redacted]. [redacted] advised that she could be reached via her cell phone until she is able to provide me with her new contact information.

I also received a message from [redacted] Attempted call back but the line was busy.

June 14, 2005, I received information that Epstein’s plane was at Jet Aviation. I spoke with Det. Lee regarding surveillance.

I called the Olive Garden and asked for Haley Robson. I was advised she was not working today. This would indicate that Robson was still employed there.

On 07/07/2005, I faxed subpoena requests to SA Mighdolls office for Epstein, Robson and [redacted], phone records. (Phone numbers [redacted]). The original subpoena requests only provided subscriber and billing information.

On 07/20/2005, conducted a trash pull arranged by Ofc. Lee. Inside there were misc. papers with phone numbers and names. There were
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misc. female hygiene products in the trash. Based on a prior Auto
Track report done on 358 El Brillo, a possible subject residing at the
residence is Nada Marcinkova. Marcinkova fit the description provided
by officers who had conducted surveillance in the area of a female
seen entering and leaving the residence.

On 07/21/05, I received the Duces Tecum dated 07/18/05, which was
clerked by ASO

On 07/26/2005, I received the results of Bell South Subpoena.

On 08/04/05, I received DHL Express from T mobile with the results of
the query.

I spoke with [REDACTED] who confirmed that [REDACTED] was still living
out of state. It appeared that all was going well.

I left a message for [REDACTED] at [REDACTED]

On 08/08/2005, I received the results of Cingular cell phone subpoena.

During the week of 09/08/2005, I checked 358 El Brillo and the Palm
Beach International Airport but there was no direct indication that
Epstein was in town.

On 09/08/2005, I reviewed the case notes of this file, as the case
will be turned over to Det. Recarey.

On 09/11/2005, while on patrol, I conducted a check at Epstein's
residence and found that it still had the hurricane shutters on. On a
drive by the Palm Beach International Airport later that afternoon, I
did not observe Epstein's plane.

On 09/14/2005, I conducted a check at the Palm Beach International
Airport but did not see Epstein's plane.

On 09/19/2005, I spoke with [REDACTED] to keep her updated and to
find out if there was any change of address or phone numbers for [REDACTED]
I was told no. I left a message for [REDACTED] at [REDACTED]
in order to provide her with Detective Recarey's information.

***************************** NARRATIVE # 2 *****************************
Reported By: RECAREY, JOSEPH
Entered By: ALTOMARO, NICKIE A.

On September 19, 2005, I met with Officer Pagan and received the
information pertaining to this case. Members of the Burglary Strike
Force had previously been conducting surveillance on both Epstein and
Robson. Officer Munyan was assigned to monitor the Epstein home and
Sgt Sorge and Officer Minot were assigned to monitor Robson. Both
teams provided a surveillance log that will be placed into the
Det. Dawson was assigned to relieve Officer Munyan at 4:00 pm; he informed me that at approximately 8:00 pm, Epstein had left for the airport and his private jet was sitting on the tarmac. Epstein’s private vehicle drove to the jet and unloaded packages into the jet. It appeared that Epstein left the county at this time. Surveillance will continue to determine when Epstein will return.

Inv Continues.

*************** NARRATIVE #3 ***********************
NA Reported By: PARKINSON, GREGORY A. 9/23/05
Entered By: ALTOMARO, NICKIE A. 9/23/05

On Friday, September 23, 2005 at approximately 1:45 p.m., I began to copy a tape micro cassette, under case number 05-368 and property number 05-243, tape number 1. I placed the tape in the telex copy-et, series 2 machine and began to go through the copying process. Approximately 1/2 through the tape, the tape wrapped around the spindle and became locked and stretched the tape. I examined it and determined that it was in the best interest to leave it as it is as a prior copy had been made and turned over to Sergeant Frick. I immediately took the tape to Sergeant Frick and allowed him to examine it and then obtained the copy from him and Detective Recarey and brought the copy of the tape down and made a copy for him based on that. The tape was placed back in the original container and is retained in the evidence bag under the previously mentioned property number of 05-243. It is not advisable to attempt to copy this tape as further damage could result to the recorded material and there is an existing copy anyway.

*************** NARRATIVE #4 ***********************
NA Reported By: PARKINSON, GREGORY A. 9/26/05
Entered By: ALTOMARO, NICKIE A. 9/26/05

On 3-24-05 at 11:00 pm, a copy of tape 2 (case number 05-294) had been made for Det. Pagan by Evidence Specialist Annette Badger. The copy was turned over to Detective Recarey.

On Friday, 09-23-05 at approximately 2:15 pm, I was in the process of reproducing audio tapes (micro and standard) to standard size when it was discovered, in the test review process, that tape number 2 was blank. I notified Sgt. Frick and Det. Recarey. I was informed that they had a prior copy and I could use it to make a master tape. I did so and when reviewing and signing the evidence sheet, I noticed Evidence Specialist Badger had written "#2 is blank."

I obtained that copy from Det. Recarey and made a new copy on a standard size tape. The new copy was placed in the evidence bag under
Copies of the tapes that were submitted into evidence were requested. Additionally, trash pulls were started on September 21, 2005. Sgt. Szarszewski made telephone contact with Tony Higgins, Supervisor of the Sanitation Department, and requested that trash be collected at the Epstein House located at 358 El Brillo in Palm Beach. Sgt Szarszewski met with Sanitation worker, Jeff Williams and observed him enter the property at 358 El Brillo. Shortly thereafter, Williams exited the property and placed the three white trash bags in the empty well in the rear of the truck. Williams then drove away where he met with Sgt. Szarszewski who removed the bags from the well and placed them into one large black trash bag. The bag was returned to the Police Station where I was waiting for him. Upon his arrival, we inspected the bags where several notes and papers were found. These notes contained names of girls with times. Additionally, there was a note from [redacted] to Jeffrey Epstein on a notepad, which stated, "For a good time call [redacted] and [redacted] at [redacted]." Also, there was another telephone number on the note [redacted]. Also found was a written note, which stated, [redacted] can not come at 7 p.m. tomorrow because of soccer. These items were written on notepads that contain Jeffrey Epstein on the bottom of the notes. These items were placed into evidence for future follow up. I requested subpoenas for subscriber information on the telephone numbers listed above on the note from [redacted] and [redacted]. The cellular telephones [redacted] and [redacted] are both assigned to Cingular Cellular Service. Other notes were found within the trash on Jeffrey Epstein pad, papers that contained telephone numbers. One note had [redacted] with [redacted] written on it. This cellular number is assigned to Cingular Cellular Service. Another sheet had written [redacted] which is assigned to Bell South Telecommunications. The subpoenas were picked up and submitted to Cingular and Bell South Telecommunications for subscriber information.

On September 22, 2005, I was informed by Sgt. Szarszewski that there would be no trash pick up as it was recycle pick up day. A request for copies of the micro and standard size cassettes were requested from crime scene to familiarize myself with the interviews conducted.

On September 23, 2005, the tapes were received and I began to become familiar with the interviews that were conducted. Det. Krauel had met with Town of Palm Beach Sanitation worker, Jeff Williams and observed him enter the property of 358 El Brillo. Shortly thereafter, Williams exited the property and placed the three white trash bags in the empty well in the rear of the truck. Williams then drove away where he met with Det. Krauel who removed the bags from the well and placed them into one large black trash bag. The bag was returned to the Police Station where I was waiting for him. Upon his arrival, we inspected
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the bags where several notes and papers were found. The notes will be inspected for future use. The items collected were placed into evidence.

It became evident that some of the recordings were recorded with background noise and some interference. The calls most affected were the control phone calls from the victim to the suspect Haley Robson. I obtained the graphic equalizer and discovered that the calls are able to be legible with the use of the equalizer by lowering the background noise and increasing voice gain. I also learned that a tape was broken during the copying of the tape. I returned the copy of the tape marked Property Number 05-243 to have it recopied to have an original in evidence and a working copy with the file.

Upon researching the file, it was discovered that the suspect, Haley Robson's cellular calls were subpoenaed incorrectly. The suspect telephone number was [redacted] and the original request was for [redacted]. I requested the information through Cingular Cellular Service from February 2005 through the present. The purpose was to have a record of Robson making calls to victim, Jeffrey Epstein and the frequency of calls. The request was submitted to the State Attorney's Office.

Investigation Continues....

****************************** NARRATIVE # 6 ******************************

NA  Reported By: KRAUEL, CURTIS D.  10/06/05
     Entered By: ALTOMARO, NICKIE A.  10/06/05

On or about September 23, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. Williams had been previously notified to assist in trash pulls at the residence of Jeffrey Epstein, 358 El Brillo, Palm Beach, Florida. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the back of an empty sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 4 white in color plastic bags and each contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about September 26, 2005 at approximately 0900 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jessie Jones. Jones had been previously notified to assist in trash pulls at the residence of Jeffrey Epstein, 358 El Brillo, Palm Beach, Florida. I observed Jones enter the driveway of 358 El Brillo, where no trash was located within the receptacles. I left the area without incident.
and notified Det. Recarey to that affect.

On or about September 27, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jesse Jones. I observed Jones enter the driveway of 358 El Brillo and remove one plastic bag of trash and place it in the back of an empty sanitation truck.

I then followed Jones to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 1 white in color plastic bag which contained correspondence for 358 El Brillo. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Monday October 3, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the back of an empty sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 7 white in color plastic bags with a red tie and 1 black in color plastic bag which contained 2 white in color plastic bags with a red tie. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. Inside of one of the white in color bags, I located a broken piece of a hard plastic or clear acrylic stick, which was shaped with small ridges. This device is commonly used as a sexual toy which is inserted into the vagina or anus for stimulation. This item, along with all documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Tuesday October 4, 2005 at approximately 0928 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the side well of the sanitation truck. This side of the truck is separate from the rear of the truck and does not come into contact with other trash.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 2 white in color plastic bags which were tied at the top. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Wednesday October 5, 2005 at approximately 0928 hours, I
Case No. 1-05-000368 (Continued)
responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into theed of the sanitation truck.

I then followed Williams to a predetermined location and seized the
trash from the truck. The trash was transported to the Palm Beach
Police Department where I began sifting through its contents, with the
assistance of Det. Recarey. There were a total of 2 bags, one of
which was white in color and tied in a knot at the top, and the other
was a black in color bag, which contained two white in color trash
bags along with loose debris. Each of the bags contained
documentation and correspondence for 358 El Brillo and Jeffrey
Epstein. All documents of evidentiary value were removed and turned
over to Det. Recarey for follow-up.

**********************************************************************
NARRATIVE # 7 **********************************************************************
NA
Reported By: RECAREY, JOSEPH 10/07/05
Entered By.: ALTOMARO, NICKIE A. 10/07/05

I met with Det. Krauel and requested further assistance to maintain
trash collections at Epstein's residence at 358 El Brillo Road. On
October 3, 2005, at approximately 10:30 am, I was contacted by Sgt.
Frick to respond to the Palm Beach Police Station. Det. Krauel had
observed Jeff Epstein riding his bicycle on South County Road. Upon
my arrival, I met with Sgt. Frick who advised, as Epstein was currently
in Town; we interview as to her involvement with Epstein
and the girls that are brought to his house. As we were to interview
in the county, (outside of our jurisdiction), I contacted the
State Attorney's Office Investigation Division, and made contact with
Assistant Supervisor Investigator Carlos Ortiz. I requested
assistance to interview as the interview may occur in the
county. Supervisor Ortiz assigned Investigator Mike Waites to assist
us at the location and interview of

Det. Dicks had responded to the address of and viewed her
vehicle parked in the driveway. was a red Plymouth Neon
baring was parked in the driveway of in Loxahatchee. Sgt Frick and I responded to 120th Ave and
awaited the arrival of Investigator Mike Waites. Upon his arrival, he
was briefed that should she wish to be interviewed within her home he
would be needed. However, should agree to return to the police
station for further questioning, he would not be needed. Sgt. Frick
and I knocked on the door and met with . was told
that we were investigating a claim involving Jeffrey Epstein of El
Brillo in Palm Beach. was asked if she wanted to accompany us
back to the police station for further questioning. She was also told
that at the conclusion of the interview she would be returned home.
She agreed and wished to change her clothes prior to accompanying us
back to the police station. At the conclusion of her changing
clothes, she advised she was ready to go. I thanked Inv. Waites and
advised she was going to voluntarily return to the police station.
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Upon [redacted] entry in the unmarked Detective vehicle, I placed a tape recorder within the vehicle to record any conversations within the vehicle. During the ride back to the police station, [redacted] advised she is attending Palm Beach Community College at the Palm Beach Gardens Campus and is majoring in journalism.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau. I explained to [redacted] that I appreciated her willingness to assist us and informed her that should she desire to leave at any time she may do so. I further explained the interview room door is only closed for privacy. [redacted] stated she understood. During the taped sworn interview, [redacted] was asked how she came in contact with Epstein. [redacted] stated back when she turned 17 years of age she was approached by a friend [redacted] in the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money.

She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey. [redacted] (Unknown last name) and [redacted] (Unknown last name) picked her up and she was taken to Epstein's house. Upon her arrival at the house, she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as Sara. She was led upstairs to the main bedroom known to her as Jeff Epstein's bedroom. Sara arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. Sara then left the room and informed her Jeff would be in a minute. Jeff entered the bedroom wearing only a towel. He lay on the table onto his stomach and picked massage oil for [redacted] to rub on him. During the massage, [redacted] stated, He tried to touch me and I stopped him. I asked how he tried to touch her. He grabbed her buttocks and she felt uncomfortable. [redacted] also stated Epstein has a vibrator, which is large and white in color. [redacted] told Epstein, I'll massage you but I don't want to be touched. [redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.00 for the massage. He explained, I know you're not comfortable, but I'll pay you if you bring some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23-year-old female and Epstein stated that the female was too old. [redacted] was asked how many girls she brought in total to Epstein. [redacted] stated six that she can remember. [redacted] stated she brought and the victim in this case.

I asked [redacted] which one was the youngest. [redacted] advised the victim was the youngest. [redacted] stated every girl she brought knew what to expect when they arrived. They were told they would provide a massage, possibly naked, and some touching. I asked her if the victim was aware. She stated every girl she brought knew what to expect. She explained she knew the victim wanted to make money. She approached the victim and explained about going to work for Jeff. The
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(Continued)

victim agreed and arrangements were made to bring the victim to Epstein's house on a weekend. [Redacted] stated that she and [Redacted] (later identified as [Redacted]) picked up the victim at the victim's house. They traveled to Epstein's House and entered through the kitchen door. They met with the house chef and Epstein's assistant Sara. The victim was introduced to Epstein while they were in the kitchen area. Sara led the victim upstairs and Epstein went upstairs. When the massage was over, the victim returned to the kitchen area. [Redacted] stated she was paid $200.00 for bring the victim to Epstein's. [Redacted] stated the victim told her she was paid $300.00 for the massage. Back in the vehicle, [Redacted] asked the victim what happened. The victim told her about the massage and then they went shopping. [Redacted] stated the victim was the last person she brought to Epstein. She further stated that she had changed her cellular number to avoid being contacted by Sara. She continued that when Epstein announces to his assistant that he is traveling to Palm Beach, Sara would contact [Redacted] to arrange girls for Epstein. Sarah, later identified as Sarah Kellen was also known to have told [Redacted] that Jeff likes to have his fun with the girls.

[Redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. She further stated that Sara still tries to call the house and leaves messages. With the assistance of [Redacted], we were able to identify Epstein's DOB 1945, [Redacted] DOB 1987, [Redacted] DOB 1987, and [Redacted] DOB 1988.

Sgt Frick entered the room and explained that based on her own statements, she had implicated herself with bringing underage girls to Epstein's house. [Redacted] was aware of what she had stated and wished to assist further in hopes to receive a lesser charge. [Redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived. As [Redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [Redacted] made the comment I'm like a Heidi Fliess. (Hollywood Madam who sent girls to clients for sexual favors in California). [Redacted] was dropped off at her house without incident.

Sgt Frick and I went to [Redacted], Loxahatchee, Florida in an attempt to speak with Mrs. [Redacted] (Sara's Mother) at the front door. We met with Mrs. [Redacted] introduced us to her husband and allowed us entry into the home. We sat in the dinning room and met with [Redacted] 1988. As she was under the age of eighteen, [Redacted] was advised we would be speaking with her. She expressed, if her daughter had information she wanted to assist. As we interviewed [Redacted] she denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff's
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(Continued)

House with Haley Robson approximately eight months ago and sat in the kitchen with the house chef but nothing happened. As the parents were present during the interview, we felt that was withholding information from us. She made several comments as to she has put the entire incident behind her. I left my direct telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. for her time and left the area.

She stated she would ask her again after we left as to what happened at Epstein's house. I informed her that had my telephone number and hopefully she would call.

Sgt Frick and I then attempted contact with at . We met with who stated was her daughter. was at the Wellington Mall and was not home. We explained the ongoing investigation and felt the may have additional information as we had information that she had worked for Jeff. We left our phone numbers and asked her to telephone me upon her daughter's return. We then left the area.

On October 4, 2005, at approximately, 8:05 am, Sgt Frick had retrieved a voice mail message from . She stated she had spoken with her daughter and she had information as to what occurred at Jeff's house. I contacted who stated her daughter was in the shower at the moment and would be traveling back to Orlando to attend College. I informed her I would be en route to her home in . Det. Dawson and I drove to the home and met with and During a sworn taped statement, stated she was taken to the house by Haley Robson. She was told she could make money working for Jeff. She was told she would have to provide a massage to Jeff. stated upon her arrival to the house she was brought to the kitchen area by Robson.

They met with the house chef and Haley stayed in the kitchen. She was introduced to Sara, Jeff's assistant and was brought upstairs to the master bedroom. Sara prepared the room and massage table for a massage. Epstein entered the room and she provided a massage. stated she kept her clothes on during the massage. She stated sometime during the massage Epstein grabbed her buttocks and pulled her close to him. She said she was wiered out by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I asked if she has any formal training in massages to which she replied no. I asked her if Robson received any monies for taking her to perform the massage. stated Robson also received money for taking her there. stated she went with Robson and another girl, to Jeff's house once. stated she waited in the kitchen with Robson, while was taken upstairs by Sara. stated she only did the massage once, as she was wiered out by the whole experience. At the conclusion of the interview and the tape was stopped, I was informed that Sara had attempted to reach via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as Sara who requested her to call her back reference the

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police questioning. This voice mail message was recorded onto a micro

cassette. provided the incoming telephone number as

stated she inadvertently told about the police investigation because had called her to tell her

about how she just received a rental car from Jeff Epstein. had called her to tell her that she was given a rental car, a 2003

Silver Nissan Sentra, to utilize to visit family and visit Jeff.

asked her what was going on at the house that the police would

be asking questions. then called Jeff and Sara and asked what was going on reference the ongoing police

inclusion. According to , Sara has since then been trying to

contact her to ask about the police questions. I instructed not to contact Sara and do not provide any more information to

as she would notify Jeff Epstein and Sara what was transpiring.

Investigation Continues...

NA

On March 30, 2005, I was asked by Sgt. Daniel Szarszewski to begin

conducting surveillance and trash pulls reference Detective Pagan

conducting a criminal investigation involving Jeffrey Epstein. I was

advised that Epstein was possibly engaging in sexual contact with

young females.

On March 30, 2005, I made contact with Town of Palm Beach Sanitation

Office Supervisor Tony Higgins and requested trash pulls for 358 El

Brillo Way to begin on March 31, 2005.

On March 31, 2005 at 9:20 a.m., I responded to the area of 358 El

Brillo Way and met with Town of Palm Beach sanitation employee,

Jeffrey Williams. I observed Williams enter the driveway of 358 El

Brillo Way, collect the trash bags from Epstein's property and place

the contents into an empty sanitation truck. I followed Williams to a

nearby area, were he turned over seventeen white plastic trash bags,

which were collected from Epstein's property.

I took the trash bags to the sanitation department were I sifted

through its contents. I collected mail correspondence from Armani

Exchange addressed to Nada Marcinkova, Jeffrey E. Epstein notepaper

with an important message notepaper addressed to J.E dated 03/29/05 at 8:15 p.m. reference U.S Airways

boarding pass copy for passenger, Janusz Banasiak, Montgomery County,

Maryland Health Department food service ID for Janusz

Banasiak and Ghislaine Maxwell notepaper with names and phone numbers. Photocopies of the trash collected were attached with the supplement.

Detective Pagan was advised of the contents that were collected for
evidentiary value.
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On March 31, 2005, Sgt. Daniel Szarszewski requested that I set up a surveillance vehicle on E1 Brillo Way and conduct video surveillance of the front exterior of Epstein's residence. At 3:00 p.m., I set up a surveillance vehicle equipped with a video monitoring device. The surveillance vehicle was parked on E1 Brillo Way approximately fifty feet east of Epstein's driveway. The purpose of the video surveillance was to gather investigative intelligence by monitoring and recording all vehicle and pedestrian traffic entering and leaving Epstein's property.

The video surveillance tapes were changed daily with a new Maxell T-160 VHS tape. Video surveillance was established for Epstein's from March 31, 2005 through April 05, 2005. On April 05, 2005, video surveillance was concluded. I reviewed the video tapes and advised Detective Pagan the surveillance videos yielded no evidentiary value.

On April 01, 2005 at 9:30 a.m., I responded to the area of 358 E1 Brillo Way to meet with Town of Palm Beach sanitation employee, Jessie Jones. While parked in the area of 358 E1 Brillo Way waiting to collect Epstein's trash, I observed a white female, whom I recognized as Nada Marcinkova from her Florida driver's license photograph. I made no contact with Marcinkova. While parked in the area, I also observed Epstein's GMC Yukon truck leave the property as well as other vehicles arrive and park across the street from the property. The occupants of these vehicles appeared to be housekeepers, maintenance men, and gardeners.

At 9:38 a.m., I met with Town of Palm Beach sanitation employee, Jessie Jones. I observed Jones enter the driveway of 358 E1 Brillo Way and collect the trash from Epstein's property. I followed Jessie to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. I collected all correspondences addressed to Jeffrey Epstein, automotive records and personal documents for Janusz Banasiak and Beata Banasiak as well as Jeffrey Epstein newspaper with the names and appointment times for [REDACTED] and [REDACTED]. No last names or other personal information was written on the newspaper.

While sifting through Epstein's trash, I also collected a three-inch purple finger size object, which had a broken end. The object appeared to be a broke piece from a sexual toy similar to a (Cyclone Vibrator) possibly used for rectal gratification. The sexual object was photographed for Detective Pagan, packaged in a biohazard evidence bag (possible body fluids) and secured as investigative evidence. All items collected from Epstein's trash were turned over to Detective Pagan for evidentiary purposes.

On April 05, 2005 at 9:18 a.m., I met with Town of Palm Beach sanitation employee, Jessie Jones. I observed Jones enter the driveway of 358 E1 Brillo Way and collect the trash from Epstein's property. I followed Jessie to a predetermined area at which time I
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collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. I collected mail correspondences addressed to Jeffrey Epstein as well as notepaper (Important Message) with names and telephone numbers. The following are items collected from Epstein’s trash.

- blank piece of white paper
- black paper
- black paper
- David
- MSN Hotmail web page with email address

The following items were documented for Detective Pagan’s investigation for evidentiary purposes.

On April 06, 08, 11, 12, 13, 15, 2005, at approximately 9:30 a.m., I met with Town of Palm Beach sanitation employees. I observed the employee enter the driveway of 358 El Brillo Way and collect the trash from Epstein’s property. I followed the employee to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents.

All of the documents collected from Epstein’s trash during my assistance were turned over to Detective Pagan for evidentiary purposes.

On June 14, 2005, Detective Michelle Pagan contacted me and advised that the airplane belonging to Jeffrey Epstein of 358 El Brillo Way was parked at the Palm Beach International Airport.

Detective Pagan requested that I begin trash pulls for the purpose of gathering evidence and intelligence.

I made contact with Town of Palm Beach Sanitation Office Supervisor Tony Higgins and requested trash pulls for 358 El Brillo Way to begin on June 15, 2005.

On June 15, 2005, I met with a sanitation employee. I observed the employee enter the driveway of 358 El Brillo Way and collect the trash from Epstein’s property. I followed the employee to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. The trash yielded negative results and no evidence was collected.

No further trash was collected throughout the week due to the fact that Epstein’s security gates remained closed throughout the week; therefore, the sanitation employees were unable to gain access onto the property for collection of the trash.
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Date: 7/25/06
Time: 8:47:53

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(Continued)

All evidence and intelligence gathered by this officer has been turned over to the detective bureau and no further action has been taken by this officer.

End of supplement.

*********************** NARRATIVE # 9 ***********************

NA

Reported By: REGAREY, JOSEPH
Entered By.: ALTIMARO, NICKIE A.

10/07/05
10/10/05

On October 4, 2005, I made telephone contact with [redacted] who had left several messages on voice mail. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 15:45 pm, I made telephone contact with [redacted]. During a taped recorded [redacted] statement, [redacted] stated the following: Approximately a year ago, when she was sixteen years of age, Robson took her to Jeff's house twice. The first time she went, Haley Robson drove to the house. They entered through the kitchen area where she was introduced to Sara and Jeff. She was taken upstairs to a bedroom by Sara who set the room up with a massage bed and brought out the oils to use. Jeff then entered the room wearing a towel. He lay on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage, he tried to remove her shirt at which point she became very upset and discontinued the massage. Both [redacted] and Jeffrey had a verbal disagreement at which time she left without being paid. She met with Haley Robson who was sitting in the kitchen and told her let's go. [redacted] advised she received no money for that day. [redacted] also said that Haley Robson had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you are paid.

Several weeks later, [redacted] advised she agreed to be taken a second time by Haley Robson. Once they arrived at the residence, Haley sat in the kitchen and Sara took her upstairs to the master bedroom again. Sara set the room up with a massage bed and brought out the oils to use. Jeff then entered the room wearing a towel. He lay on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage, he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Jeff was unable to touch her buttocks. Jeff then rolled onto his back during the massage; he attempted to touch her breasts. [redacted] then became upset again and told him she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where Haley Robson was waiting for her. She told Robson she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware of her friend, [redacted] was also at the house and had a problem with Jeff. She provided a telephone number.
The interview was concluded and the micro cassettes were turn in as evidence.

On October 5, 2005, I researched the incoming telephone number that had left a message. The telephone number was assigned to AT&T/Cingular Cellular service. I prepared a subpoena request and faxed the request to the State Attorney’s Office. Information requested was subscriber information as well as all incoming and outgoing calls for the months of September and October 2005.

I later researched and discovered she resides in Royal Palm Beach. Det. Dawson and I drove to Royal Palm Beach and met with at her residence in Royal Palm Beach.

agreed to speak with us in the kitchen area. During a sworn taped statement, stated the following: On or about November 2004, she was approached by Haley Robson and asked if she wanted to make money. She agreed and was told she would provide a massage to a wealthy man in Palm Beach. Robson picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that and went with them. They were brought into the kitchen where she was introduced to Jeff and other females. stated she was introduced to a helper of Jeff; the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with Robson. The assistant set up the massage table and put lotions to be used. She told Jeff would available in a minute. Jeff entered the room wearing only a towel. Jeff lay on the massage table and picked a lotion to rub on his thighs and back.

further stated that during the massage Jeff asked her to remove her clothes. She complied and removed her pants and blouse. didn’t remember if she had removed her bra but feels that she did. was certain that she stayed in her thong underwear. continued the massage and at one point she straddled him to massage his back, which touched his buttocks with hers. was instructed to return to the ground at which time Jeff turned to have his chest rubbed. advised it was at this time she is sure he was masturbating. did not want to look at his penis area because she was uncomfortable. Jeff removed a large white vibrator and turned it on. stated he began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Jeff ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, was paid either $350.00 or $400.00. She stated she wasn’t sure, but knew it was close to $400.00. At the conclusion of the interview, stated she never returned to provide a massage for Jeff. She advised she was ashamed and uncomfortable with the situation.
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(Continued)

Det. Dawson and I then left the area and responded to the [redacted] High School where Robson and all the above-mentioned girls had attended. I met with School Police Officer, Off Williams. I explained I was looking for a previous student who attended [redacted] High School. I inquired about [redacted] and further explained that I was working a case in which most of the girls I have interviewed are either witnesses or victims and felt that [redacted] may be one as well. Officer Williams researched his previous student records and found [redacted]. She attended the same year and graduated in the same year as the other girls. I was provided the last known address of [redacted].

At approximately 3:10 pm, Det. Dawson and I met with [redacted] at her residence, [redacted], in Royal Palm Beach. As [redacted] was only seventeen years of age, I had notified her mother, Mrs. [redacted], that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs. [redacted] advised she wanted [redacted] to cooperate and consented to the interview. During a sworn taped statement, [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by Haley Robson for a chance to make money. [redacted] was friends with the friends of Robson and knew the same people. [redacted] had been previously told by her friends what Robson did for Jeff. Robson called a person known to [redacted] as Sara and scheduled the appointment. Robson picked [redacted] up and drove her to Palm Beach to a street called Brillo Way. They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Jeff. [redacted] was introduced to Jeff. Robson led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. Robson dimmed the lights and turned on soft music. Robson exited the room and Jeff entered the room wearing only a towel. Jeff picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Jeff asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Jeff removed his towel. As [redacted] rubbed his chest area, Jeff attempted to reach down her pants through the buttocks area, however, was unable to due to the tightness of the jeans and a tight belt. [redacted] advised Jeff began to masturbate as she rubbed his chest. Jeff moaned as she rubbed his chest. She observed he was continuing to masturbate and attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Jeff stopped. However, he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. I asked [redacted] if she knew the difference between circumcised and not circumcised. She explained she knew and advised Jeff was circumcised. [redacted] was paid $200.00 for the massage and left the area. She met with Robson who was waiting in the kitchen area and left the house.

[redacted] then explained she never provided another massage for Jeff. She did however, go to the house with Robson and [redacted] as they
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(Continued)
took another friend of Robson's. [Redacted] advised she was present when [Redacted] went to work for Jeff. She advised she rode over and sat in the kitchen area with Robson to wait for [Redacted] who advised that while they waited for [Redacted] the house chef prepared lunch for them, as it was almost lunchtime. As [Redacted] was finished with the massage, they left the area. I asked if Robson ever told what would be expected of her when she provided a massage. [Redacted] stated yes, Robson told her that a massage would be expected possibly naked and possibly some touching involved. [Redacted] has no formal training in providing massages.

[Redacted] spoke about a third and last time she went to Jeff's house. Robson drove another girl, [Redacted], who is [Redacted]' friend, to Jeff’s house. [Redacted] stated she knew that Robson had made money providing girls for Jeff and she wanted to do the same. Robson took them in the kitchen area of the house and introduced [Redacted] to Sara.
Robson and Sara took [Redacted] upstairs to the main bedroom. [Redacted] advised she doesn't know what happened as [Redacted] did not speak about what happened in the room. [Redacted] received $100.00 from Robson for going with her to Jeff’s house and recommending [Redacted] who was unable to remember [Redacted]'s telephone number. The interview was concluded and we left the area.

Investigation Continues...

*************** NARRATIVE # 10 ***************

NA
Reported By: RECARRY, JOSEPH
Entered By.: AUTOMARO, NICKIE A.
10/09/05 10/10/05

On October 6, 2005, Det. Dawson and I went to Lynn University located in Boca Raton. We met with Dean of Students, Paul Turner. I explained to Mr. Turner that we were investigating a crime within the Town of Palm Beach and felt that a student, [Redacted] may have information. Turner confirmed that [Redacted] is a student and currently on the soccer team for Lynn University. She was in computer class at the time of our arrival. Turner sent a security guard to locate [Redacted] in class and bring her to the office. Mr. Turner allowed us to interview [Redacted] in an empty conference room.

At 11:45 am I met with [Redacted] and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [Redacted] stated she had previously spoken with [Redacted] who told her she was interviewed by detectives. During a sworn taped statement, [Redacted] stated she knew that Haley Robson worked for Jeff in Palm Beach. [Redacted] advised she has been there many times for massages. I asked her if she had formal training in providing massages, [Redacted] stated she did not. [Redacted] advised she was told what was expected of her by providing massages and would have to remove clothing but if she felt uncomfortable just to say so and Jeff would stop pushing the issue. [Redacted] began providing massages and advised she kept her clothes on. She considered Jeff a pervert who kept...
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(Continued)

pushing to go further and further. [*] explained she would keep
telling him she had a boyfriend and that it would not be right to her
boyfriend. It wasn’t until recently [*] admitted to removing her
clothes and staying in her thong underwear to provide a massage.
[*] explained Jeff wanted to be rubbed on his back and recently he
began turning over to have her rub his chest as he masturbated. He
would try to touch her breasts as she rubbed his chest. [*] stated,
Jeff would try to get away with more and more on each massage.

Originally, Robson drove her to the house for the original massage.
[*] left Sara her cell phone number and every time Jeff would come
into town, Sara would call her for an appointment. Each time she
went, Sara would meet her at the kitchen door area. She would bring
her upstairs and prepare the massage table. [*] advised Jeff would
ask her questions about herself. He knew she was a soccer player and
would be attending Lynn University. I asked [*] if he knew her real
age. [*] stated Jeff didn’t care. The most recent massage she
provided was on October 1, 2005. During the massage she asked Jeff if
she could borrow one of his vehicles to visit her family and boyfriend
in Orlando. Jeff had told her she could borrow one of his vehicles but
later stated he would rent her a car. She continued with the massage
as Jeff grabbed her buttocks and caressed the buttocks cheeks. I
asked [*] if she was wearing undergarments to which she replied her
thong underwear. Once he tried to touch her breasts she would pull
away from him and he would stop. [*] was asked if he ever used a
vibrator on her. [*] was aware of the vibrator but advised she
ever would allow him to use the vibrator on her. She described the
vibrator as a large white vibrator with a huge head on the tip of the
vibrator. She stated he kept the vibrator in a closet near the
massage table. [*] advised she had been doing the massage for
approximately two years, which meant she would have started doing
massages for Jeff at the age of sixteen.

[*] stated she was contacted by Sara on October 3, 2005. Sara had
informed her that Jeff had rented her a new Nissan Sentra and she
should come by the house to pick it up. Sara informed [*] she would
have the car for a month. [*] stated Jeff knew her car was not
working properly and had missed appointments in the past because of
her car being inoperable. [*] explained the car is currently parked
next to the Gym field. I asked her if she ever took any one to the
house. [*] explained she took [*] a friend of hers who has returned to Orlando to attend college. I asked she ever allowed
another female in the room. [*] advised no one was brought into the
room with her. At the conclusion of the interview, Det. Dawson and I
went to the Gym area and located the Silver Nissan Sentra bearing
Florida tag X98-APM. The vehicle is registered to Dollar rent a car
out of the Palm Beach International Airport.

Telephone contact was made with [*] the victim’s mother, at
[*] I explained to her that I was following up on this case
and provided a complete update on the case.

Investigation Continues.
On October 10, 2005, at approximately 2:30 p.m., I made telephone contact with [redacted]. During a taped conversation, [redacted] was told of an ongoing investigation in which I felt she had information pertaining to Jeffrey Epstein. [redacted] explained she met Epstein when she was just sixteen years of age. She was approached by [redacted], a friend who also had previously gone to Epstein's house for massages. [redacted] advised she was working at the Wellington Mall when she was approached. [redacted] told her that she would have to provide a massage to Epstein and she would have to perform this massage naked. [redacted] thought about the offer and stated she could make $200.00 for only 30 minutes of work. She agreed to perform the massage and set the appointment for her that same day. [redacted] remembered it was a weekend as she only worked at the mall on the weekends. [redacted] took her to the house where she was introduced to Sara, Jeff Epstein's assistant. Sara took her upstairs to a master bedroom. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom where Sara prepared the room by setting up the massage table and provided the oils for her to rub on Epstein.

Epstein entered the room and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] could not remember if he was naked or if he entered the room with a towel. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. She continued to rub his legs with the oils. Epstein touched her breasts and began to masturbate. I asked [redacted] if she knew what circumcised and un-circumcised meant. [redacted] stated circumcised is when the penis has no foreskin and the head of the penis is visible. [redacted] said Epstein is circumcised. [redacted] began to cry on the telephone and stated she had been to his house hundreds of times over a two-year period. [redacted] claimed to have made hundreds of dollars during each visit. [redacted] stated she could not remember how many times exactly she went to Epstein's home but said it was a lot.

[redacted] became more upset, crying hysterically and stated she was paid and instructed to have sex with Epstein's assistant, Nada Marcinkova by Epstein. Epstein continued to watch them have sex and masturbated himself as they had sex with each other. She further stated that things escalated further and further. Epstein used sexual toys such as vibrators, rubber penises and strap-on penises on [redacted]. Additionally, [redacted] stated he performed oral sex on her numerous times. She claimed he (Epstein) put his fingers inside her vagina while he masturbated in an attempt to make her climax. [redacted] could not continue and wanted some time to regain her composure. I explained to [redacted] to take her time. After taking several minutes to regain her composure I
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explained that I would travel to meet with her in person as I felt she had additional information to provide. I met with Sgt. Frick and explained the importance to meet with in person. Sgt. Frick agreed and made arraignment for Det. Dawson and I to meet with in Jacksonville, Florida.

On October 11, 2005, at 4:10 p.m., Det. Dawson and I met with [redacted] and her friend, [redacted], at in Jacksonville, Florida. [redacted] wanted to have present for support. I explained to her that I did not have a problem as long as she wanted present during the interview. stated she wanted her present. I explained that as was present she was not allowed to comment or ask any questions during the interview. She was only there to comfort should the interview upset her.

During a sworn taped statement, [redacted] explained how everything began. She said she was brought through the kitchen area where she met Sara for the first time. She was led to the master bedroom, Epstein’s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where Sara prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her skirt on. She could not remember if he was naked or if he entered the room with a towel. Epstein then instructed her to remove her skirt. [redacted] removed her skirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. She continued to rub his legs with the oils. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] paid $1,000. They walked together downstairs where Sara and [redacted] were waiting. [redacted] stated they received an unknown amount of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town. [redacted] explained that she continued to go to Epstein’s house and became a regular at the house. She could not provide an exact number but claimed she had been their hundreds of times. She claimed sexual activities did not occur every time she was there. There were times she went to dinners and parties with Epstein. [redacted] explained that things began to escalate more than the massage. The encounters included bringing in his assistant, Nada Marcinkova. [redacted] explained Epstein had purchased her from her family in Yugoslavia. Epstein bragged he brought her into the United States to be his Yugoslavian sex slave. [redacted] advised he was naked in the bedroom, she entered and removed her clothing. Marcinkova entered the room from the steam room area already naked. He instructed [redacted] to perform oral sex on
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Marcinkova. refused to perform that act. Epstein offered her an additional $200.00 for her to perform oral sex on Marcinkova for five minutes. explained that Epstein would masturbate while he watched them perform sexual acts.

Things continued to escalate by purchasing sex toys. stated she had massagers, vibrators and strap on rubber penises used on her. Each time something new was introduced additional monies were produced and offered for Epstein to allow the acts to happen. was adamant that she performs all these acts but there was an understanding with Epstein that no vaginal penetration would occur with his penis. explained that Epstein's penis was deformed. explained that his penis was oval shaped. She claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. She called it egg-shaped.

continued that the sexual encounters with Marcinkova, Epstein and her became a ritual. would arrive at the house and walk herself upstairs, where Marcinkova and Epstein were waiting. would remove her clothing and join them on the bed. explained Marcinkova and she would begin by kissing and touching each other. explained sex toys were brought into the bed by either Epstein or Marcinkova and they would begin using the toys on each other. Epstein would perform oral sex on either person depending on who was on top during the intercourse. explanation revealed they were in a missionary position.

advised one day, was unable to state and exact date when this incident occurred), she came to the house after Sara had informed her that Epstein had arrived. She arrived at the house and went upstairs to the master bedroom. advised she immediately removed her clothing, as Nada Marcinkova and Epstein were already naked in the bedroom. explained that Nada Marcinkova and she had a sexual encounter to include kissing, touching and oral sex. remembered that she climaxed and was removing her self from the massage table.

asked for a sheet of paper and drew the massage table in the master bathroom and where Epstein, Marcinkova and she were. Epstein turned on to her stomach on the massage bed and inserted his penis into her vagina. stated Epstein began to pump his penis in her vagina. became upset over this. She said her head was being held against the bed forcibly, as he continued to pump inside her. She screamed no, and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein apologized for his actions and subsequently paid her a thousand dollars for that visit. Additionally, shortly thereafter, Epstein gave a 2005 Doge Neon, blue in color for her personal use.

advised there were times that she was so sore when she left Epstein's house. advised she was ripped, torn, in her vagina area. advised she had difficulty walking to the car after leaving the house because she was so sore. advised that other
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than that one time, when Epstein inserted his penis inside her vagina, there was no other penile intercourse.

provided names of girls that she knew of that have gone to Epstein's house. provided the name of and feels she still may be going to the house to massage Epstein. According to is still sucking his dick."

When asked if she had been recently contacted by anyone of the house, advised she received an email from Sara, from which is her email account. The email was just a hello, how are you doing type of email. There had been no other contact from the house. The interview was concluded and left the area. The tapes and drawing were submitted into evidence.

Investigation continues...

**NARRATIVE**

On October 12, 2005, Det. Dawson and I traveled to the Orlando area and made telephone contact with who agreed to meet with us as we were in the Orlando area. provided directions to her apartment. and I met with who stated, during a sworn taped statement that nothing happened between her and Epstein. appeared nervous during the interview. I assured her that I had spoken with other people who advised differently. stated she only went a couple of times and provided a massage to Epstein. she stated she was brought to the Epstein house in March of 2005. brought her to work. has no formal training in providing massages. stated she provided a massage, fully clothed for $200.00. As I sensed hesitancy in her answers, I asked if she had been contacted by anyone from the house. stated she was interviewed already by an investigator for Epstein. He met with her on October 8, 2005, at a Roadhouse in Orlando. He identified himself as Paul and inquired about the police investigation and left his telephone number for additional contact. provided no additional information, as it appeared her responses were almost scripted. We left the area and returned to Palm Beach Police Department.

Based on the information acquired during the interviews, a search warrant was prepared for entry at the Epstein home. On October 18, 2005, I met with Judge Laura Johnson who reviewed the warrant request. She found there was sufficient probable cause and signed the warrant request. On October 20, 2005, at approximately 9:36 am, members of the Palm Beach Police Investigations Unit executed the search warrant at 358 El Brillo in Palm Beach. Members of the Investigations Unit included Capt. Gudger, Sgt. Frick, Det. Dicks, Det. Dawson, Det. Melnichok, Det. Sandman, Det. Krauel, the crime scene unit and myself.
As we entered onto the property, we encountered the house manager, Janusz Banasiak who was in the guest portion of the house. The guesthouse section had open doors and no forced entry was made. I made contact with Banasiak, Date of Birth Fl DL and informed him of the search warrant for the premises. The members of the Police Department entered the residence and announced we had a search warrant. A safety search was done and members exited the home. I read the search warrant to Banasiak as Mgr Parkinson videotaped the search warrant execution. Several interior decorators were located on the property. I spoke with Mark Zeff, of New York. Mr. Zeff stated he is the designer for Mr. Epstein’s homes. He advised he was contacted in March of 2005 to do a complete overhaul on the house. He advised he was on the phone with Mr. Epstein when officers announced the search warrant. Mr. Epstein was then made aware of the search warrant. Mr. Zeff advised, his contact with Epstein is strictly business and he has never witnessed Epstein with any girls except for his assistants, Sara or Nada.

I then interviewed Daniel Estes, of in New York. Mr. Estes stated he has worked for Zeff for seven years. He advised he personally worked on the New York and Palm Beach home for Mr. Epstein. He has previously met with Sara and Adrianna, Epstein’s assistants in New York and in Florida. Estes stated they travel with Epstein everywhere he goes.

I interviewed Zara Bailey of New Jersey. Bailey stated she just arrived from Scotland and has worked with Zeff for only one month. She stated she has never met Epstein and has not seen him. The interview was then concluded.

I then spoke with Douglas Schoettle New York City. Schoettle stated he has been Epstein’s Architect for seven years. He further stated he deals with Epstein’s assistants and speaks with Epstein on the phone. Schoettle stated he mainly speaks with Sara Kellen, Epstein’s main assistant, who travels with Epstein. Schoettle stated he only has contact with Epstein when his services are needed.

At approximately 10:30 am, I was informed that the videotaping was concluded. I entered the residence and located two covert (hidden) cameras. The first camera was a covert wall clock in the garage area. I traced the wire behind the clock and removed the RCA wire and unplugged the camera. The other covert camera was located within a desk clock beside Epstein’s desk. I traced the wire behind the clock and unplugged the RCA wire. I could not locate another camera. I then began with the search of the residence for the specified evidence.

My search consisted of the second floor. Det. Krauel and I began in the master bedroom area where several items were located. They were
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marked to be retrieved by the evidence custodian. In the master desk with Epstein's notepads marked Jeffrey Epstein we located a high school transcript from [redacted] High School for [redacted]. Also in the room, was the dresser / armoire where we located a bottle of peach flavored Joy Jelly (Sexual Lubricant). Additionally, there were several photographs of young naked teenage girls within the closet, which was consistent with what the witnesses said. The massage table was also located within the master bedroom. Video tapes were located beside the television, which were also collected. An itemized list of the property and locations was prepared on the property receipts. At approximately 2:55 pm, the house was secured; the exit of the residence was videotaped. Upon our exit of the property, I encountered Avty. Guy Fronstein who advised he was representing Mr. Epstein. He provided a business card and provided his assistance with the investigation.

Due to Hurricane Wilma, which struck South Florida causing massive power outages, the courthouse was closed due to the lack of power. I was previously told that the Chief Judge had extended the filing deadlines due to the hurricane and the Courthouse being closed. On October 27, and 28, 2005 the courthouse was closed and I could not file the search warrant and inventory at the clerk's office. On October 31, 2005, I responded to the courthouse and filed the paperwork along with an order to seal, signed by Judge Johnson, to deny any release of any paperwork on this case.

INV CONTINUES...

********************************************************************** NARRATIVE  # 13 **********************************************************************
NA
Reported By: PARKINSON, GREGORY A. 10/20/05
Entered By: ALTOMARO, NICKIE A. 11/07/05

On October 20, 2005, at approximately 8:30 a.m., Thursday morning, I was advised by Captain Gudger that a search warrant would be executed and that I was to assemble the Crime Scene Investigative Team and stand by the south side of the building ready to go. I designated Evidence Specialist Annette Badger to handle the inventory return, the documentation of the property receipts and the collection and bagging of the evidence at the scene. I further instructed CSI Kim Pavlik, ID # 8807, to accompany and perform the role of photographing the scene and the items that may be taken into custody by the affiant, Detective Joseph Recarey, ID # 7915.

My responsibility was to go through from the reading of the warrant to the final exit from the residence and perform a video recording of the reading of the warrant, the initial walk through of the residence showing the current condition and then finally a walk through of the residence at the time of the police exit.

We started out towards the residence, which was located at 358 E1 Brillo and arrived at approximately 9:33 a.m. The search was conducted, items were collected by Evidence Specialists Badger,
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photographed by CSI Pavlik and then videotaped by myself. The search
was concluded at approximately 3:05 p.m. whereupon Detective Recarey
and I were the last two officers in the house. Upon securing the
residence we met with the gentleman who identified himself to
Detective Recarey as the lawyer for the defendant and he was informed
that the residence was secured and that copies of the inventory return
had been left on the first floor table of the personal assistant's
office.

Detective Recarey and I returned to Police Headquarters and secured
for the day.

############################ NARRATIVE # 14 ############################
NA
Reported By: DAMSON, MICHAEL C. 11/07/05
Entered By: ALTOMARO, NICKIE A. 11/07/05

On October 20, 2005, I assisted Detective Recarey in the execution of
a search warrant at 358 El Brillo Way, Palm Beach, Florida, 33480.

Upon the announcement of the search warrant, immediate contact was
made with three white males who came out of the house or surrounding
structures. Those males were identified as Janusz Banasiak, Daniel
Estes, and Mark Zeff. As other members of the police department
cleared the home, I kept watch over these three males. Once the house
was cleared, those males were turned over to Detective Recarey.

Detective Dicks and I were assigned to assist in the search of the
main house, the cabana and the servant's quarters. We started in the
garage. All areas of the garage were searched to include four
vehicles. These vehicles were three black Mercedes Benz cars
registered to Jeffrey Epstein. The fourth vehicle was a Harley
Davidson motorcycle, green in color, registered to Jeffrey Epstein.
Nothing was recovered from the garage.

A towel closet and pantry located off the kitchen were searched and
yielded negative results.

The kitchen was searched and taken into evidence was a phone message
book that was located near a house phone.

North of the kitchen was an office room which contained a computer.
The room had a closet that contained a locked gun locker. The
combination was entered by Banasiak in the presence of Sgt. Frick and
the safe was opened. Items were taken from the room. See the
completed property receipt for a detailed list.

A green bathroom located on the first floor was searched and nothing
was taken.

A closet located just west of the green bathroom was searched. Two
massage tables were located in the closet along with a photo of a nude
I searched two bedrooms and their adjoining bathrooms, which were located on the second floor on the East side of the house. In the Northeast bedroom closet I found adult sex toys called Twin Torpedoes. Soap made in the shape of a penis and vagina were also found in these upstairs bedrooms. See the property receipt for details.

I searched the pool cabana located on the South side of the pool. Photos were taken from the wall. See the property receipt for details.

I assisted in the search of Banasiak's living quarters. Numerous CD's along with a message book was seized. See the property receipt for details.

On November 1, 2005, I was contacted by Atty. Gus Froutstain, who advised he was willing to assist with the investigation. Atty. Froutstain advised he would try to have his client, Jeffrey Epstein available to be interviewed. I explained I would be interested in conducting an interview with his client as well as other employees that are employed within the house. Atty. Froutstain advised he would return my call once he received confirmation on the interviews.

On November 6, 2005, I attempted contact with [redacted] at her residence. I left a business card for her to return my call. Upon returning to the police department, I had received a telephone call from [redacted]. I returned her call at [redacted] and spoke with [redacted]. She made arrangements to respond to the station to provide an interview. At approximately 3:30 pm, she arrived at the Palm Beach Police Station with her boyfriend. Her boyfriend was allowed to sit in the lobby area while Ms. [redacted] was interviewed.

I took Ms. [redacted] to the Detective Bureau Interview room. I closed the door for privacy and explained to her that I appreciated her coming to the police station for the interview. During the sworn taped statement, she advised she was at Jeffrey Epstein's house one time. Approximately two months ago, she was approached by a girl, [redacted], who was dating her roommate, to make some quick money. [redacted] advised she was in need to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by [redacted] that the massage would have to be done in her underwear. She advised [redacted] drove with her and brought her into the house. They walked into the kitchen area and took the stairs upstairs. [redacted] further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and...
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introduced himself as Jeff. [Redacted] advised she recalled she and [Redacted] removed their clothing down to their panties, Epstein lay on his stomach area and they provided a massage on his legs and feet area. I asked [Redacted] if she had any formal massage training and she replied no. [Redacted] advised she was topless and the panties she wore were the boy shorts lace panties. She and [Redacted] continued the massage until the last ten minutes of the massage, Epstein, told [Redacted] to leave the room so that [Redacted] could finish the massage.

[Redacted] got dressed and Epstein turned over onto his back. Epstein then removed the towel, which had been around his waist. Epstein laid there naked and requested that [Redacted] rub his chest area. [Redacted] stated as she did this, Epstein, began masturbating as she rubbed his chest. [Redacted] stated he pulled down her boy short panties and he produced a large white vibrator with a large head. She stated it was within a drawer in his master bathroom. He rubbed the vibrator on her vagina area. [Redacted] advised he never penetrated her vagina with the vibrator.

He continued to rub her vagina with the vibrator as he continued to masturbate. [Redacted] stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. [Redacted] got dressed and met with [Redacted] in the kitchen area. Epstein came into the kitchen and provided [Redacted] $200.00 for bringing him and paid $200.00 to [Redacted] for providing the massage. [Redacted] was told to leave her telephone number with Sarah, his assistant for future contact. [Redacted] provided her cellular telephone number for future contact. [Redacted] was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by Sarah for her to return to work for Epstein. [Redacted] stated work is the term used by Sarah to provide the massage in underwear. [Redacted] advised she declined, as she was not comfortable in providing that type of work. The interview was concluded and the videotape was placed into evidence.

Investigation Continues...

*eapositive text*
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who were taken to Epstein's house to provide massages. She further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied Robson with the 14-year-old victim, and each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. It was also told that should Epstein require them to do anything extra and they were not comfortable just to tell him and he would stop. Robson stated she received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, the victim, as she stated she was fifteen years old at the most; she looked really young. She further stated each time she went to the house, she sat in the kitchen and waited with Robson until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. She stated there were a lot of naked girls in photographs throughout the house. The interview was concluded and the tape was turned into evidence.

Investigation Continues...

******************** NARRATIVE # 17 ********************

NA

Reported By: RECAREY, JOSEPH
Entered By: ALTOMARO, NICKIE A.

Det. Dawson and I attempted contact with Ms. [redacted] in Royal Palm Beach. I left my business card at her front door. Ms. [redacted] returned my call and arranged a meeting with me at the Palm Beach Police Department for November 8, 2005. At approximately 2:00pm, Ms. [redacted] arrived at the Palm Beach Police Department. She was brought into the interview room and the door was closed for privacy. She was told that I appreciated her coming to the police station for questioning regarding an ongoing investigation. She was told that I was investigating a crime involving Jeffrey Epstein and knew, based on the investigation, that she had encounters with him in the past. During a sworn taped statement, Ms. [redacted] stated she had met Epstein approximately two years ago. She was first introduced to Epstein by Haley Robson. Robson approached her about working for Epstein and providing a massage to him for $200.00. The arrangements were made and as Robson could not take her the day the arrangements were made, Ms. [redacted] took Ms. [redacted] also attended [redacted] High School and was familiar with Epstein.

Ms. [redacted] recalled she was brought there and entered through the back kitchen door. She had met with an assistant Sarah and another assistant Adrianna. Sarah brought her upstairs as she observed several photographs of naked females throughout the house. Ms. [redacted] stated Epstein came in the room, wearing only a towel, and laid on the table. Ms. [redacted] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. She stated that on the first massage she provided she did not remove her...
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(Continued)
clothing. The stated she had returned several times after that. Each time she returned more things happened. The stated that the same thing would happen. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. The stated she was unsure if he climaxed as he masturbated under the towel. Additionally she never looked blow his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color with a large head on her. Every time she provided a massage he would masturbate. She added she has no formal training in providing a massage. The stated she brought two females during her visits to provide massages. The stated she brought a girl named and a girl from High School. The stated she received $200.00 for each girl she brought. Additionally, was given $200.00 for taking her in the very beginning. The interview was concluded and the tape was placed into evidence.

Investigation continues...

************************* NARRATIVE # 18 *************************

NA

Reported By: RICE, JOSEPH

Entered By: ALTOMARO, NICKIE A.

On November 8, 2005, I made telephone contact with W/F, 987, at her residence. responded to the police station for an interview reference an ongoing investigation. At approximately 2:30 pm, she arrived at the Palm Beach Police Station and was brought into the interview room for the interview. The door was closed for privacy and she was told that I appreciated her cooperation in this case. During a sworn taped statement, stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as . had asked her if she wanted to make money providing massages to Epstein. had heard that several girls from High School were doing this and making money. She agreed and was taken to the house by . had introduced her to Sarah and Epstein and brought her upstairs to a master bedroom and Master bathroom where a massage table was prepared and the proper oils were taken out. left the room and waited downstairs for . stated Epstein entered the room wearing a towel and she provided a massage wearing only her thong panties. Advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed; once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated received $200.00 for bringing to Epstein.

stated she had gone a total of 15 times to his residence to provide a massage and things had escalated from just providing a
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(Continued)
massage. Epstein began touching her on her buttocks and grabbed her
closer to him as he masturbated. Epstein also grabbed her breasts and
fondled her breast with his hands as she provided the massage. She stated on one occasion, he offered extra monies to have vaginal
intercourse. She stated this all occurred on the massage table.

Stated Epstein penetrated her vagina with his penis and began
having intercourse with her until he reached the point of climax.
Epstein removed his penis from her vagina and climaxed onto the
massage table and received $350.00 for her massage. I asked her
if she had any formal training in providing massages, stated she
did not.

Continued to state on one other occasion, Epstein introduced his
assistant, Nada, into the massage. Nada was brought into room with
them to provide a massage. Epstein had them kiss and fondle each
other around the breasts and buttocks as they provided a massage to
Epstein. Epstein, watched and masturbated as this occurred. On other
occasions, Epstein introduced the large white vibrator/massager
during the massage. Epstein stroked the vibrator/massager on
her vagina as she provided the massage.

Stated the last time she spoke with anyone at the house was
with Sarah during the weekend of October 2 or 3, 2005. She stated
she had brought two people to the Epstein house. She provided the
names of [redacted] and [redacted] (unknown last name). It should
noted [redacted] had been previously identified as [redacted] and had
been previously interviewed. The interview was concluded and the
videotape was placed into evidence via the locker system.

On November 9, 2005, Sgt Frick and I traveled to
Boynton Beach, Florida in hopes to interview Juan Alessi, the
former houseman of Epstein’s house. As no one was home, a business
card was left for him to return my call. We then traveled to
Miami in hopes to interview Alfredo Rodriguez, a former
houseman of Epstein. We did not locate them at home. I left a
business card for him to return my call.

We then traveled to Lynn University and met with Dean of Students, Mr.
Turner. We requested to speak with [redacted] who was re
interviewed, as she still was in possession of the rental car that
Epstein had acquired for her. She stated that Sarah, Epstein’s
assistant, had called her on her cellular telephone and informed her
that rental was extended for her. Sarah stated she had paid an
additional $625.00 for her to keep the rental an extra month. She
was asked if she had any additional contact with either Epstein or
anyone from his organization. She stated she did not, other than
the telephone call informing her that she could keep the car for an
extra month. She did not provide any additional information.

On November 10, 2005, at approximately 9:47 am, Alfredo Rodriguez had
telephoned reference my business card found on his door. Rodriguez
stated he had worked with Epstein for approximately six months after
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(Continued)
the previous houseman left. Rodriguez stated that it was his responsibility to keep the identity of the masseuses private. Mr.
Epstein had a massage in the morning and one in the afternoon. Mr.
Rodriguez stated he would rather speak about this in private. He advised he would come to the police station to speak with me.
Rodriguez stated he would return my call on Monday, November 14, 2005.

I then made telephone contact with Juan Alessi. He advised he found my card on his door and wanted to know what I needed to speak with him about. I explained to Alessi that I was conducting an investigation on his former employer, Mr. Epstein. Alessi stated he would return my call shortly as he was in the middle of a project at his home. I received a telephone call from Attorney Donald Morrell from [redacted]. Mr. Morrell stated he represented Mr. Alessi and did not want me speaking with his client. I then made telephone contact with the State Attorney's Office and confirmed that subpoenas would be issued to the former employees to assist in the investigation.

I then made telephone contact with Attorney Guy Fronstin, attorney for Mr. Epstein. I explained to Mr. Fronstin that I would like to speak with Mr. Epstein. He stated Mr. Epstein is not in residence in Florida at this time and would check with him to ascertain if he could be here by Wednesday November 16, 2005 for an interview. Mr. Fronstin stated he would return my call should Mr. Epstein decide to come in to the police station for an interview.

Investigation continues.

************** NARRATIVE # 19 **************

On November 14, 2005, Det. Sandman and I traveled to [redacted] in Loxahatchee, Florida and spoke with [redacted]. She was told of the ongoing investigation involving Epstein. She advised she had gone to the house on several occasions. During a sworn taped statement, she advised she started going to the house approximately one year ago and was brought by [redacted] to [redacted]. She stated [redacted] brought her into the house and she was introduced to a girl named Sarah. Once she met her, [redacted] brought her upstairs into a master bedroom bathroom. [redacted] stated she met Jeffrey in the bathroom. He lay on the table and picked the massage oils. She provided the massage, as he lay naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage.

[redacted] stated she had only been at the house approximately five or six times. [redacted] said each time she went to the house she was notified by Sarah, Epstein's assistant, that Epstein was in town and would like her to work. [redacted] stated she returned to the house and was again led upstairs by Sarah. She provided the massage, clothed.
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advised it wasn’t really weird until later on. She was asked if she ever removed her clothing to provide a massage. She stated it was not until the third time she went that she removed her clothing. She stated she was notified by Sarah that Epstein wanted her to come to work. She arrived at the house and was led upstairs by Sarah. She started providing the massage when Epstein asked her to remove her clothing. She removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. She stated she knew he was masturbating himself as she providing the massage. She stated she believed he climaxed based on his breathing. She did not see either the climax or the fact that he was masturbating. She stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services.

stated on the last time she went to provide a massage, she was notified by Sarah to come to the house and work. She stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel as he entered the room to lie on the table. She stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. She further stated her boyfriend was in the car waiting for her. She further stated that Epstein got upset, as she wasn’t enjoying the massage. She told him that she didn’t want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. I asked her if she had any contact with Epstein’s organization, she stated she received $200.00 from Western Union in Royal Palm Beach and Okeechobee Blvd as a Christmas gift. She advised she had no formal training in provide any massages. She also stated she was sixteen years old when she first went to Epstein’s house.

At approximately 4:22 pm, I made telephone contact with ... She agreed to meet with me at a public place. I suggested she come to the police station for an interview. She did not want to meet at the police station. I recommended we meet at the Palm Beach Gardens Mall in the food court area. She agreed and an appointment was made for November 15, 2005 at 5:00 pm at the food court.

Investigations Continue.

Proprietary and Confidential

On 10/20/2005, I assisted executing a search warrant at 358 El Brillo Way in the Town of Palm Beach, Palm Beach County Florida under the direction of affiant Detective Joe Recarey.
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(Continued)

Detective Melnichok and I searched the pantry room that is west next to the kitchen. This room had all white cabinets with a dark grey and black counter top. We did not find anything in this room.

We searched the yellow and blue room that is west next to the pantry room. This room had a very large statue of man with a bow. Taken into evidence from this room were nine photographs in frames of various women.

We searched the main entrance foyer that is to the north of the yellow and blue room. This room contained two bamboo chairs and ottomans with cushions. It also contained a round table with numerous books.

We searched another blue room that is west of the foyer. This room had a stereo system and book shelves that were from the floor to the ceiling. Taken into evidence from this room were eight photographs in frames of various women and/or Epstein, the owner of the residence.

We searched the room to the west of the blue room that has sliding glass doors that lead out to the pool. In this room in a dresser were two DVD's and two VCR tapes. These items were taken into evidence.

We searched a 2004 black Chevy Suburban bearing Florida tag X99-EGL, registered to Jeffrey Epstein DOB [redacted] which was located on the east side of the driveway facing south. I found a Thrifty rental agreement between the passenger seat and the middle console. The name on the rental agreement was Johanna Sjoberg from [redacted]. The phone number on the rental agreement was [redacted]. The vehicle rented was a white [redacted]. The vehicle was rented on 9/25/05 at 17:58 hours and was returned on 9/26/05 at 16:52 hours. The last four numbers of the credit card used are [redacted]. Detective Melnichok found a piece of paper in the middle console that said I used the cash in here to fill up the tank and was signed by Johanna.

I searched the 2005 black Cadillac Escalade ESV bearing Florida tag Q29-9GT, registered to Jeffrey Epstein dob [redacted] which was located on the west side of the driveway facing south. I did not find anything in this vehicle.

All of the items that were taken into evidence were photographed in the place they were located and then turned over to crime scene.
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On November 15, 2005, Det. Sandman and I traveled to Royal Palm Beach. We met with a seventeen-year old juvenile who was not in school this day due to a cold from which she was suffering. We were told that I needed to speak with her in reference to an ongoing investigation involving a subject she would know as Jeffrey Epstein. Prior to speaking with her, I explained that because of the fact that she is a minor, I needed to speak with her parents prior to speaking with her. She telephoned her father, Mr. , on his cell phone and explained to him that Det. Sandman and I were there to speak with her. I spoke with Mr. on the telephone and informed him I needed to speak with his daughter in reference to an ongoing investigation. Mr. advised he had no problem with us speaking with his daughter.

During a sworn taped statement, stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by who informed her that she could make monies providing a massage to Epstein for $200.00. had informed her that she would have to provide this massage topless. and made the arrangements with Epstein and his assistants and took to the house. and she entered through a glass door that led into a kitchen. took her upstairs, to a master bedroom and master bathroom. She recalled the bathroom had a large pink couch, sauna and matching shower. entered into the room wearing only a towel. and removed their clothing remaining only in thong underwear. She further stated that Epstein lay on his chest on the table. selected which oils to use for the massage. Both and provided the massage on his legs, back and feet. Forty minutes into the massage, turned over onto his back and requested to wait downstairs in the kitchen area for . instructed to finish the massage. got dressed, started rubbing his chest, left the room, and began masturbating himself as rubbed Epstein's chest. stated he continued masturbating until he climax on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel, he instructed the massage was done and to get dressed and meet with downstairs. got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. stated she was aware that also received monies for the same thing.

The second time she went to the house she was again approached by asked if she wanted to return to the house to provide another massage; agreed and the arrangements were made by for her to return to the house. stated drove her to the house and knocked on the same glass door that leads to the kitchen area. They were allowed entry into the house by one of the staff members. led her upstairs to the master bedroom and

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master bathroom area. [Redacted] left [Redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [Redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He lay on the table on his stomach as [Redacted] began massaging his legs and back.

As [Redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [Redacted] started to rub his chest and he began masturbating himself. As [Redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [Redacted]'s vagina and masturbating himself at the same time. [Redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large, grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [Redacted] stated he climaxed onto the towel again and informed her that the massage was done. [Redacted] got dressed and met with [Redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [Redacted] said she never returned to the house and had no desire to return to the house. [Redacted] was asked if she received any formal massage training. She advised she had no formal training. [Redacted] was asked if Epstein knew her real age. [Redacted] stated he knew as he asked her questions about herself and high school. He was aware she attended and is still attending [Redacted] High School.

The interview was concluded. I suggested [Redacted] inform her parents of what occurred at the Epstein house. [Redacted] stated she would tell her father as he was unaware this had occurred. I left my business card for any questions they may have. We left the area and returned to the police station. The tape was placed into evidence.

Investigation Continues.

On November 15, 2005, Officer Munyan and I responded to the Palm Beach Gardens Mall food court section to meet with [Redacted]. At approximately 5:10 p.m., [Redacted] arrived and met with us at the food court. [Redacted] provided a sworn taped statement in which she stated she had been at the Epstein house over fifty times. She began going to Epstein's house when she turned eighteen years old. [Redacted] was asked if she knew of the on-going investigation. [Redacted] stated she was aware there was an investigation as she had been told by other girls that were interviewed. Additionally, she has had several telephone conversations with Epstein's assistants as to what had been going on during the investigation.

I asked [Redacted] how she was introduced to Epstein. [Redacted] stated she did not want to disclose who brought her to the house but she would
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(Continued)

respond to any other questions. When I asked her what happened at the house, stated everything happened. It all began with the massages. Each time she went more things happened. She would massage Epstein and he would masturbate and climax. She stated things escalated from there. She provided oral sex on Epstein and he provided oral sex on her. She stated he would also use a massager/vibrator on her vagina to stimulate her as she massaged him. He introduced his assistant Nada or Nada to have vaginal intercourse with synthetic penis. She stated Nada or Nadia would utilize a strap-on (synthetic penis) to have intercourse with her. She was told to masturbate herself as Epstein and Nada had sexual intercourse. All this was done at Epstein's direction.

could not provide exact dates as she had been to the house so many times. stated Epstein inserted his fingers in her vagina to stimulate her as she massaged him. When I asked her if there had been any vaginal intercourse with Epstein, she stated she did not have sex with him. She did admit having sex with Nada, his assistant.

stated not every time she went involved sexual favors. Sometimes she would just talk with him and get paid. I asked her how much she was paid each time she went to Epstein's residence. stated she got paid $300.00 every time she went to the house. She was told to bring other girls to him to provide massages. Declined stating that she does what she does and did not want to introduce anyone else to do what she does.

I showed a photo line up in which Nada Marcinkova was placed in position six. She reviewed the six photographs and immediately identified Nada Marcinkova as the person with whom she had intercourse. Additionally, it was the same person she watched have intercourse with Epstein. She signed the photo line-up under Nada Marcinkova's photo as the person she identified. We then left the mall and returned to the police station. The photo line up and tape were placed in to evidence.

Investigation Continues...

* * * * * * * * * N A R R A T I V E  # 23 * * * * * * * * * *

NA

Reported By: RECANREY, JOSEPH 11/29/05

Entered By: ALTOMARCO, NICKIE A. 12/01/05

On November 17, 2005, I received a phone message from Atty. Guy Fronstin who advised to call his cellular phone reference his client Jeffrey Epstein. I telephoned his cell phone and left a message for him to return my call. I did not receive a call back on Thursday, November 17, 2005. On Friday, November 18 2005, I retrieved another voice mail from my work phone from Mr. Fronstin advising he would not produce his client Jeffrey Epstein for any statement. Fronstin stated he had spoken with ASA Lana Belohlavek and expressed Mr. Epstein has a passion for massages. I called ASA Lana Belohlavek and confirmed that
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(Continued)

Fronstin had telephoned her reference this case. Although nothing was discussed, Mr. Fronstin did advise her that Epstein is very passionate about massages.

I also spoke with ASA Daliah Weiss reference the previous employees, Juan and Maria Alessi. She advised that they had been served through a subpoena process server. They were both scheduled to appear on Monday November 21, 2005 at 12:00 p.m.

On November 21, 2005, I met with ASA Weiss, Atty. Donnie Murrell and Juan and Maria Alessi at the State Attorney Office. ASA Weiss had requested a court reporter to be present to take the statement of the Alessi's. I spoke with Maria Alessi, in the presence of her attorney, Donnie Murrell. She advised she had worked for Epstein for eight years, from the period of 1994 through 2002. She advised she had never had any direct conversations with him. She stated it was her husband who spoke directly with Epstein. Her work consisted of doing house cleaning, shopping and other preparations when Epstein would arrive in town. Alessi stated the preparations consisted of preparing the house and bathrooms for his arrival. She advised she did view several masseuses that arrived at the house. She advised that two or three girls would come during a day and provide the massages. The girls that arrived looked young in age. Mrs. Alessi did not know any of the girls personally and were always different. She was told that when Epstein was in residence he did not want to encounter the Alessis during his stay in Palm Beach.

I then spoke with Mr. Alessi in the presence of his attorney, Donnie Murrell. Mr. Alessi stated that he was employed for eleven years with Mr. Epstein. He originally was hired as a part time employee and then moved up into a full time position. His duties included everything. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein's arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. He remembered dealing with his girlfriend, Ms. Maxwell originally and then dealt with Epstein directly.

I asked Mr. Alessi about massages that occurred within the home. Mr. Alessi stated Mr. Epstein had up to three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. There were times he recalled that he would set up the massage tables either in Epstein's bedroom or in his bathroom. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage. Alessi was never privy to what went on during the
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massages.

He was asked if he remembered any names of the girls that massaged Epstein. He tried to remember and was unable to provide any exact names of any girls. Alessi was asked about any contact with anyone from the Epstein organization. Alessi said he did speak with Mr. Epstein shortly after my initial contact with him to find out what was going on. Alessi also stated that approximately on November 11, 2005, he was contacted by a private investigator from the Law Office of Roy Black. The investigator had called him to meet with him to ascertain what he was going to tell the police. Alessi stated they met at the Carrabba’s Restaurant in Boynton Beach and discussed the same questions I was asking him. I informed Mr. Alessi and Mr. Morrell that as this is an ongoing investigation and anything we discuss should be confidential. They both acknowledged the fact that the information would be kept confidential. It should be noted that a court reporter was present during the interviews and would be providing a copy of the statements to me when they become available.

On November 21, 2005, I received a voice mail from Mr. Fronstin who advised he would not be making Mr. Epstein available for any statements. He did have some words that he wanted to relay on behalf of Mr. Epstein. I telephoned his office and left a message for him to return my call.

On November 29, 2005, I received a call back from Mr. Fronstin who left a voice mail after hours on November 28, 2005, advising he would return my call during normal business hours to speak with me reference the case on November 29, 2005.

**************************************** NARRATIVE # 24 ****************************************

NA
Reported By: RECARRY, JOSEPH  11/29/05
Entered By.: ALTMARO, NICKIE A.  12/01/05

On November 29, 2005, at approximately 2:30 p.m. I received a telephone call on the department issued cell phone. Mr. Fronstin stated he was calling to relay information that Mr. Epstein wished he could relay. Mr. Fronstin stated that he would not allow Mr. Epstein to speak with me at this time. He further stated that Mr. Epstein is very passionate about massages. He continued that Mr. Epstein had allegedly donated over $100,000 to the Ballet of Florida for massages. The massages are therapeutic and spiritually sound for him that is why he has had many massages. Mr. Fronstin stated he appreciated the way the investigation has not been leaked out into the media. I explained to Mr. Fronstin that it is as important to protect the innocent if the allegations are not substantiated. Mr. Fronstin was told of the allegations that the private investigators assigned to the case have been portraying themselves as police officers. Additionally, I explained that my cell phone had been called by the private investigators. Mr. Fronstin advised he was not aware of that and advised they were under the direction of Attorney Roy Black in
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Miami. Mr. Fronstin further stated Epstein had originally called Mr. Dershowitz in Boston, who recommended Roy Black in Miami, who asked Mr. Fronstin to assist. I informed him that if and when any charges would be presented I would notify him. The call was then terminated.

Investigation continues.

****************** NARRATIVE # 25 ******************
NA
Reported By: RECAREY, JOSEPH
Entered By: ALTOMARO, NICKIE A.
12/15/05
12/16/05

A review of the telephone message books, which were obtained during the search warrant, was conducted in which various messages from different dates were made to Jeffrey Epstein. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various names and names of girls that had already been interviewed. The body of the messages was time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by Sarah for Jeffrey Epstein. Based on the context of the body of the messages, I requested subpoenas for subscriber information on the telephone numbers and the time frame involved. Copies of the messages were made for evidentiary purposes.

I obtained [REDACTED] High School yearbooks for 2005, 2004 and 2003. I first reviewed the 2005 yearbook and located most of the girls I had spoken with. Additionally, I located [REDACTED]. Based on the corrected name spelling, I was able to locate her to her residence in Loxahatchee. On December 8, 2005, Det. Caristo and I responded to [REDACTED] Loxahatchee. I located [REDACTED] at her home. She advised she is attending [REDACTED] High and is participating in the early release program so she can maintain her part time job. As she is still a minor, I left my business card to have her mother return my call to request an interview with her daughter. We then left the area.

I also had previously researched the telephone number for [REDACTED] and telephone number [REDACTED]. A subpoena had been issued for the information on [REDACTED]. The telephone number was registered to [REDACTED]. A query of revealed that she is the daughter of [REDACTED] and is currently residing at [REDACTED]. West Palm Beach. Det. Caristo and I attempted contact with [REDACTED] with negative results. I left my business card on her front door requesting she return my call. We then responded to [REDACTED]. I also attempted contact with [REDACTED] with negative results. I left my business card for him to return my call.
Case No. . . . : 1-05-000368 (Continued)

On December 9, 2005, I received a telephone call from [Redacted]'s mother, who was made aware of the ongoing investigation in Palm Beach. [Redacted] advised she was told of everything that occurred at Epstein's house involving Epstein and his staff. She advised she would allow me to question her daughter about what occurred and would cooperate with the investigation. [Redacted] provided me with [Redacted]'s cellular telephone number to schedule an appointment for an official interview. I telephoned her cellular telephone and made a tentative appointment for Monday, December 12, 2005.

I then received a telephone call from [Redacted], father of [Redacted], who stated he found the business card on his door. I explained that I was conducting an investigation and needed to speak with [Redacted] as she may have information that could assist in the investigation. Mr. [Redacted] stated that his daughter no longer resides with him and has her own trailer in another trailer park. He advised he would tell her to call me.

On December 12, 2005, due to a conflict with schedules, arrangements were made to meet with [Redacted] on Tuesday, December 13, 2005 at 5:00 pm. On December 13, 2005, Det. Dawson and I traveled to Loxahatchee and met with [Redacted]. During a sworn taped statement, [Redacted] stated that when she was sixteen years old, she was taken to Epstein's house to provide a massage for money. [Redacted] stated it was before Christmas last year when she approached her and asked if she needed to make money for Christmas; [Redacted] stated she did and agreed to provide a massage for money. [Redacted] made arrangements to take [Redacted] to the house and drove [Redacted] to the house to "work." [Redacted] stated she could not remember the street name but would be able to drive to the street. They drove to the last house on the street and pulled in the last house on left side. They walked up the driveway and entered through a side gate which led to a kitchen door. They knocked on the door and were encountered by an employee who described as a "Spanish looking lady." They informed her that they were expected. They were then encountered by a white female with long blond hair. [Redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [Redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it with a sink to the right. [Redacted] was introduced to Jeff who was on the phone when she entered. Jeff was wearing a white towel and lay on his stomach so that [Redacted] may massage his feet and calves. [Redacted] started the massage with the massage oil Jeff chose and rubbed his feet and calves. Jeff got off the phone and requested she massage his back as well. [Redacted] began rubbing his back and got to the small of his back. During the rubbing of his back Jeff asked her to get comfortable.
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(Continued)

requested she remove her pants and shirt. . . removed her shirt and pulled her pants off. . . stayed in her bra and thong panties. As she finished the small of the back, Jeff then turned onto his back. He instructed her to rub his chest and pinch his nipples. As she began to rub his chest, Jeff asked her questions about herself.

. . remembered telling him she attended . . High School. Jeff asked her if she was sexually active. Before he could answer, he also asked what sexual positions she enjoyed.

. . stated she was shy and didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. . . explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. . . said "no, I don't like that."

Epstein then removed his towel and lay on the bed naked exposing his penis to . . . He began touching his penis and masturbated as he touched her breasts. . . explained Jeff then touched her vagina area by rubbing her vagina with his fingers on the outside of her thong panties. . . tensed up and stated Jeff was aware that she was uncomfortable.

. . stated that Jeff told her, "Relax, I'm not going inside." She further explained Jeff commented to her how beautiful and sexy she was. Jeff then moved her thong panties to one side and now was stroking her clitoris. . . said "Jeff commented how hard my clit was."

He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Jeff removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time he kept his hand on her vagina area rubbing her vagina. . . stated he rubbed her real hard as he was masturbating. . . said he climaxed onto the towel he had been previously wearing and got up from the table. Jeff told her there was $200.00 dollars for her on the dresser within the master bathroom. Jeff also told her that there was an additional $100.00 that was to be given to . . for bringing her there to massage him. Jeff told her to leave her telephone number with his assistant as he wanted to see her again. Jeff stated his assistant would contact her to work again soon.

I asked her if she ever received any formal massage training to which she stated she did not. . . stated it was the only time she ever wanted to work for Jeff and knew what happened to her was wrong. She stated she no longer speaks to . . because she was upset that took her there. She further stated that she had never been contacted for any additional work. The interview was terminated and we left the area.

Investigation Continues...

************************************************************************** NARRATIVE # 26 ******************************************
NA
Reported By: DICKS, ALLEN C. 12/19/05
Entered By: ALTOMARO, NICKIE A. 12/19/05
Case No. . . . : 1-05-000368  (Continued)

On 10/20/05 at approx 0930hrs I assisted with the execution of a search warrant at 358 El Brillo Ave, Palm Beach.

Initially I was assigned to enter the residence and conduct a sweep of the premises for safety purposes. I then accompanied CSER tech Pavlik while she photographed the exterior of the house. Once this was complete I was assigned to search certain areas of the house with Det. Dawson as part of the search warrant.

We began in the garage, searching three Mercedes Benz vehicles, a Harley Davidson motorcycle and adjacent closets in the garage. Nothing of evidentiary value was located.

We then searched two closets off the kitchen area on the east side. These can best be described as pantry or storage closets. Nothing of evidentiary value was obtained.

A small office with adjoining bath was then searched. In the bath area I located a phone message book with recent messages. This item was seized as evidence. Please note this bath and shower area are not used as designed but are storage areas containing a variety of items to include a gun safe in the shower and assorted household items.

We then searched a bath area and closet at the base of the main stairs in the foyer. Inside the closet two massage tables were located as well as partial nude female photographs. These items were later seized as evidence. Nothing of evidentiary value was noted in the bathroom.

We then searched two bedrooms upstairs on the east side of the residence. Located in the bath room of the south bedroom was penis shaped soap. Located in the bedroom of the northern bedroom was penis and vagina shaped soap as well as an adult sex toy. These items were seized as evidence.

We then searched the pool cabana located in the south west corner of the property. Several photographs of nude females were seized as evidence.

I was then assigned to stand by with a person I believe was Douglas Schoettle. Mr. Schoettle was in the residence at the beginning of the search warrant. He was present during the warrant service and subsequent search. I stood by with him until the search was completed and I departed the residence. I had no conversation with him regarding the reason for our presence.

Regarding seized evidence, all items were photographed in place and then collected by CSER personnel.

This concludes my involvement in this case.
On Thursday, October 20, 2005 at approximately 0936 hours, I assisted in the execution of a search warrant located at 358 El Brillo Way, Palm Beach, Florida, residence of Jeffrey Epstein. I was instructed by Case Agent Det. Joseph Recarey, to secure all computer and media related material from the residence.

Upon my arrival I was directed by Det. Recarey to a room designated as the Kitchen Staff Office. I observed a Silver in color, CPU with the left side cover removed, exposing the CPU's hardware sitting on floor next to a glass type desk. The CPU had no discernable identifiers or features indicating a make or model. This CPU was powered off with the power cord not plugged in. The keyboard and mouse were atop the CPU. It should be noted that the CPU was not connected to a monitor, printer, or other media device. On the back panel of the CPU, I observed an A/V card with RCA jacks attached. This type of hardware would allow audio and video to be downloaded onto the CPU's hard disk.

The ends of the RCA jacks were unattached at the time of the search and no external camera was located within this room.

The CPU was located on the right side of a desk that held a flat panel LCD screen. The desk also held another keyboard and mouse, indicative of a second computer; however, no other computer was found. It appeared as though a second computer had been recently removed as the cables ends from the monitor, keyboard and mouse were in the same area. A further search of the room revealed no media storage devices, i.e. CD's, Floppy Disks, Zip Disks, etc. This type of media is commonly stored in an area where computers are placed, yet no media was found.

After completing a search of this room, I secured the CPU and turned all items over to the Evidence Custodian for future forensic analysis via a property receipt.

I was then directed by Det. Recarey to a room designated as the Garden Room, where I observed a wooden desk facing west. The desk held a flat screen LCD monitor, keyboard, mouse, media card reader and printer; however, no CPU was located. All of the cables were removed from an area where a computer had once been. A search of the desk area revealed no signs of any media devices.

Det. Recarey directed me to a third location designated as the Cabana room, which is detached from the residence and located just south of the pool. In the South East corner of the room, I observed an office type setting, with an L-shaped desk holding a flat screen LCD monitor, keyboard, mouse and printer; however, no CPU was located. All of the cables were removed from an area where a computer had once been. A search of the desk area revealed no signs of any media devices.
Det. Recarey directed me to a second detached structure located on the South East corner of the property. This area of this structure was assigned with single letters to identify a particular part of the room. In the office area, designated as Room B, I observed a powered on Dell Dimension 2350, attached to an LCD flat panel monitor. The screen displayed an open Microsoft Internet Explorer browser with URL address of http://home.bellsouth.net/. I observed no other active windows in the Start panel window and photographed screen. The power cord was removed from the back of the Dell CPU and I disconnected the cable modem to prevent remote access. At that time, the Dell CPU, marked with Serial Number 6WTVN21, was secured and turned over the evidence custodian for future forensic analysis via property receipt. I also located several media related items within Room B, which were recorded onto a property receipt and turned over the Evidence Custodians.

I then responded to a Bedroom designated as Room F, where I observed a white in color CPU marked Premio. The Premio CPU was in a computer desk which held a white CRT monitor, both of which were powered on. The CRT monitor displayed a message from Norton Antivirus software, warning of an expired subscription. I observed no other active windows in the Start panel window and photographed screen. I removed the power cable from the back of the Premio CPU and shutdown all other media. The Premio CPU, marked with Serial Number 2000091078, was secured and turned over the evidence custodian for future forensic analysis via property receipt. I also located several media related items within Room F, which were recorded onto a property receipt and turned over the Evidence Custodians.

This concluded my participation in the search of the residence.

On December 20, 2005, I contacted ASA Daliah Weiss in an attempt to subpoena the Epstein former houseman, Alfredo Rodriguez. Rodriguez, who resides in Miami, had eluded the process servers previously and was not served the investigative subpoena. A telephone message was left as she is not available during the week of 12/19/2005. I made contact with State Attorney Inv Theresa Wyatt and requested the same via telephone message.

I then researched the victim's SS cellular telephone subpoena data which had been received from a previous subpoena request. I analyzed the records which depict several calls from Haley Robson. The telephone calls start on February 6, 2005 at 12:49 pm.; the same day which the victim and the victim’s father stated the incident occurred at Epstein’s house. The first incoming call was from Robson's residence at [redacted] The second incoming call from Robson’s
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(Continued)
cellular phone occurred at 1:02 pm. The call durations were one minute or less. The time frame was within thirteen minutes apart. It should be noted that Robson's residence was in close proximity to the victim's. The next call occurred at 5:50 pm when the victim telephoned Robson's residence. Several calls were made after the above mentioned calls both incoming and outgoing to Robson. Further analysis showed no telephone calls to either Robson's cellular telephone or Robson's residence were registered prior to February 6, 2005.

Additionally, I also conducted an analysis on the telephone calls from . The subscriber information confirmed that the number is registered to Paul A Lavery from Hialeah, Florida. The address was crossed referenced to the Office of Kiraly and Riley Private Investigators. I researched the web page www.rileykiraly.com which also showed various cases in which they assisted. I also located another web site under www.coralspingssparklandrotary.org in which Mr. Riley attended a Miami Rotary meeting and confirmed Atty. Roy Black is among his clientele.

The telephone calls revealed Lavery had telephone contact with either just after I attempted to interview them, or just prior. A background was conducted on Lavery which revealed he holds a current Private Investigator License. A criminal arrest record revealed he had been previously arrested for possession of cocaine and solicitation of prostitution.

I also researched the girls using www.myspace.com. This web site is a new social networking service that allows members to create unique personal profiles online in order to find and communicate with old and new friends. The site allows one to establish your own myspace.com page and decorate the page any way one wishes. I found the following people have myspace sites: Haley Robson, .

I received a Cingular Wireless packet which contained a CD which contained the results of the subpoena request for verbatim calls on . An analysis will be conducted in the near future on the phone numbers called.

Investigation Continues.

NARRATIVE # 29

Reported By: RECARBEY, JOSEPH
Entered By.: ALTIMARO, NICKIE A.

Upon doing research on the message books recovered in the search warrant, I located the identity of . The telephone number was registered to . She currently is seventeen years old and is attending the Academy. I
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(Continued)
responded to 1801 Palm Beach Lakes Boulevard, also known as the Palm Beach Mall. I located the [redacted] Foundation. I located [redacted] inside the foundation and informed her that I was investigating a case against Jeffrey Epstein and knew she had been at the house. [redacted] started to cry and advised she had put that part of her life behind her. I explained that although she is seventeen years old I needed to inform her parents that she would be interviewed. She provided her home telephone number. I attempted contact and left voice mail messages at the house to speak with her parents.

Det. Caristo and I then located [redacted] at her residence located at [redacted] in West Palm Beach. I attempted to interview her about Jeffrey Epstein. She advised she is so in love with Jeff Epstein and would do anything for him. She further explained that she would not speak with us about him either negative or positive. She asked us to leave her property. I informed her that although she did not wish to speak with us, I had sufficient information at this point in the investigation to know she was at Epstein's house and provided girls to Epstein to work. I also explained that prior to our arrival at her residence I had telephone contact with her father [redacted] who was told she would be interviewed. [redacted] is currently seventeen years old and as a juvenile, parental notification would be required. We then left the area and returned to the police station.

While at the police station, I left another telephone message for [redacted] parents. I began an analysis of Sarah Kellen's Cellular telephone. The telephone number [redacted] is assigned to Sarah Kellen and the financially responsible party is Jeffrey Epstein of 457 Madison Ave. in New York City, New York. The time frame which was subpoenaed was September 2005, through October 2005. There were eighty seven pages of calls made either to the cell phone or from the cell phone. The local (561) numbers were analyzed. A spread sheet was prepared and placed into the attachment file of who was called.

The unknown numbers were researched using FoneFinder.com and subpoenas were requested to determine subscriber information. This was done to identify additional victims or witnesses. The analysis revealed that Kellen had called the victim/witnesses frequently when Epstein was in the Town of Palm Beach to "work." This confirms what the girls interviewed had previously stated. Kellen would notify them when Epstein was in town and their willingness to "work." The CD was placed into evidence.

Investigation Continues.

****************************** N A R R A T I V E # 30 ******************************
NA
Reported By: RECARNEY, JOSEPH 1/03/05
Entered By.: ALTOMARO, NICKIE A. 1/03/05

On December 29, 2005, I received a facsimile from National Compliance
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Center from Cingular Wireless for telephone number [redacted]. This was the telephone number for Haley Robson during the time frame when the victim, [redacted], was brought to the Epstein house to "work." An analysis of the phone records, of all incoming and outgoing calls, showed that on February 6, 2005, the day the victim, [redacted], was brought to the house, Robson first called Sarah Kellen, Epstein's assistant, at [redacted] at 12:50 pm (EST). The next call was made to Epstein's house in Palm Beach, at 12:52 pm (EST). The following call was made to the victim, [redacted] at 1:01 pm (EST) and at 1:02 pm (EST). This confirms the information provided by the victim and victim's father. I photo copied the records and enlarged the page 8 of 10 to show the calls made by Robson on February 6, 2005.

To this date, I have not heard from [redacted] or his parents. I will attempt to establish contact with them during the evening hours. I received a package from Atty. Guy Fromstine, which was hand delivered at the police station. Within the package, was a letter from Alan Dershowitz, and two www.myspace.com profiles. The profiles were that of [redacted] and [redacted]. MySpace.com is a social networking service that allows members to create unique personal profiles online in order to find and communicate with old and new friends. This package was in response to a previous meeting in which Mr. Dershowitz called to assist in the investigation in providing any additional witnesses such as house employees who have been reluctant to speak with law enforcement.

I reviewed the profiles Mr. Dershowitz enclosed. [redacted], who designed her blog to be "Fucking [redacted] still attends High School, sends and receives messages from friends which contain some profanity. Upon reviewing her friends' comments section from MySpace, most of her good friends sent messages to establish contact and invite her to go out.

I then reviewed [redacted]'s web blog which was provided by Mr. Dershowitz. Ms. [redacted] designed her blog to be [redacted]". Her blog states that her interests include music, theater and weed (Marijuana). I reviewed her packet in which [redacted] declares her love for her live-in boyfriend [redacted].

The letter Mr. Dershowitz sent advised he was looking into the allegation that one of the private investigators used by the private attorneys of Epstein, attempted to impersonate or state that they were police officers from Palm Beach. Mr. Dershowitz advised that the investigators used to interview [redacted] had "quite a distinct speech impediment", did not claim to be nor did they impersonate themselves as a police officer. This package was sent to both ASA Lana Bachlavaie and ASA Daliah Weiss at the State Attorney's Office.

I made telephone contact with ASA Weiss to confirm she received the package and request an interview with Sarah Kellen, Nada Marcinkova, and Janusz Banasiak. She advised she would assist in attempting to...
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On January 3, 2006, I received a telephone call from ASA Weiss who informed me that she made telephone contact with Mr. Dershowitz. She had requested the employees be available the week of January 3, 2006. Mr. Dershowitz informed her that the assistants are out of the country and would require additional time to locate them and make them available.

Investigation Continues.

On Thursday, 03/31/05, I started conducting surveillance at 358 El Brillo. At this point I observed at 1155 hours, a Tan Altima bearing FL tag [redacted] in Roadway, Black GL bearing FL tag [redacted] in drive, Tan Honda Civic bearing FL tag [redacted] in Roadway, Black Chevy Suburban in driveway and a Black Caddy Escalade in driveway. At 1325 hours I observed Tan Honda Civic [redacted] in roadway, Black Chevy Suburban in driveway, Black Caddy Escalade in drive and a White Kia car bearing FL tag [redacted] at 1615 hours I observed a Tan Honda Civic, [redacted] in roadway, Black Chevy Suburban in drive, Black Caddy Escalade in driveway and a White Kia car [redacted] in roadway.

On Friday, 04/01/05, I continued surveillance at 358 El Brillo. At 1130 hours I observed a Tan Honda Civic bearing FL tag [redacted] in roadway, Black Caddy Escalade in driveway and a Tan unknown make/model bearing FL tag [redacted] in roadway. At 1227 hours, I observed a Tan Honda Civic [redacted] in roadway, Black Caddy Escalade in driveway and a Black Chevy SUV located behind the Escalade. At 1345 hours, I observed a Tan Honda Civic [redacted] in roadway and a Black Chevy SUV in driveway. At 1558 hours, I observed a Tan Honda Civic [redacted] in roadway, Black Chevy SUV in driveway, Black Caddy Escalade in driveway and a dark unknown model/make car parked in garage.

On Saturday, 04/02/05, I continued surveillance at 358 El Brillo. At 0713 hours, I observed a Red Explorer bearing FL tag [redacted] in roadway and a Black Caddy Escalade in driveway. At 0814 hours, I observed a Red Explorer [redacted] in roadway, Black Caddy Escalade in driveway and a Tan Honda Civic [redacted] At 0952 hours, I observed a Red Explorer [redacted] in roadway, Black Caddy Escalade in driveway, Tan Honda Civic [redacted] in roadway and also a Grey unknown make/model with a B.M in trunk retrieving landscaping tools.

At 1155 hours, I observed a Grey Camaro bearing FL tag [redacted] parking in the roadway in front of 358 El Brillo. A W/F, blond hair, teens to early 20's, thin and tall wearing a white tank top and short blue jean shorts, exited the vehicle and walked to the rear of the house. I also observed a Red Explorer [redacted] in roadway, Tan Honda Civic [redacted] in roadway and a Black Caddy Escalade in driveway. At 1310 hours, I
(Continued)
observed a Red Explorer W/F driver leaving the area, Tan subcompact on roadway and a Red Neon bearing FL tag [redacted] Then observed 3 W/Fs, approximately 16 to 18 years of age jogging. All 3 females ran into the driveway. There were 2 with blond hair and one brown hair.

On Sunday, 04/03/05, I continued surveillance at 358 El Brillo. At 0719 hours I observed a Tan Honda Civic [redacted] in roadway and a Black Caddy Escalade. At 0934 hours, I observed a Tan Honda Civic [redacted] in roadway and a Black Caddy Escalade in driveway. At 1057 hours I observed only the Tan Honda Civic [redacted]

On Tuesday, 04/05/05, I continued surveillance at 358 El Brillo. At 1052 hours, I observed a Red Explorer [redacted] in roadway, a Green Explorer, bearing FL tag [redacted] in roadway, a Grey Altima bearing FL tag [redacted] in roadway, White Ford Truck [redacted] in roadway, Black Mercedes in driveway being washed by a B/M and an unknown dark car parked in the garage. At 1059 hours a Blue Chevy Suburban drove to the house of 358 El Brillo and parked in the driveway. At 1119 hours, I observed the White Fort Truck [redacted] leave the area and the drive was the pool man.

At 1126 hours, I observed a Grey unknown make/model car park in roadway. W/M got out of the car and walked to a house on the south side of El Brillo. At 1406 hours, I observed a Red Explorer parked on roadway and a large white box truck parked behind the surveillance suburban.

***************** N A R R A T I V E  # 32 *****************

NA
Reported By: BATES, MICHAEL J. 1/03/06
Entered By: ALTOMARO, NICKIE A. 1/03/06

On 03/31/05, at approximately 1500 hours while conducting surveillance at 358 El Brillo, I observed a Black Cadillac Escalade, unknown tag, a Black Chevrolet Suburban, unknown tag, a Black Mercedes S600 FL tag [redacted] parked in the east driveway next to the 3-car garage. There was a Tan Honda Civic FL tag [redacted] parked on the street in front of the residence.

At approximately 1700 hours, I observed the Black Suburban, Black Escalade, Black Mercedes and Tan Honda Civic parked in the same place. At 1750 hours, there was no change in vehicles. At 1840 hours, I observed the Black Escalade, Black Suburban and Black Mercedes along with a Silver Hyundai Accent FL tag [redacted] all parked in the east driveway and a Red Ford Explorer FL tag [redacted] parked on the street in front of the residence.

At 2000 hours, I observed the Black Escalade, Black Suburban parked in the east driveway and the Red Explorer and Tan Civic parked on the street.

On Friday, 04/01/05 at approximately 1700 hours, I observed the Black
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Escalade and Black Suburban parked in the east driveway and the Tan
Honda Civic parked on the street in front of the residence. At 1820
hours, I observed the Suburban and Civic in the same place and a Gold
Chevrolet Camaro FL tag [REDACTED] parked on the street in front of the
residence. At 2250 there was no change. At 2330, I observed the
Black Escalade parked in the driveway and the Red Explorer parked on
the street in front of the residence.

On Saturday, 04/02/05 at approximately 1700 hours, I observed a Black
Escalade, unknown tag, parked in the driveway and a Tan Honda Civic FL
tag [REDACTED] parked in the street in front of the residence. At 1805
hours the Escalade and Civic were in the same position and the Black
Mercedes FL tag [REDACTED] was also parked in the east driveway. At 1920
hours the Escalade and Civic were the only vehicles and both were in
the same position. At 2030 hours and 2145 hours there were no
vehicles observed.

At 2115 hours, I observed a Black Mercedes, 4-door parked in the east
driveway FL tag [REDACTED] At 2300 hours, 2350 hours and 0045 hours, the
Black Mercedes was the only vehicle observed.

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NA
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Reported By: RECAREY, JOSEPH
Entered By.: ALTOMARO, NICKIE A.

I made contact with Mr. [REDACTED], father of [REDACTED],
who was told that I wished to interview his daughter. Mr. [REDACTED]
stated he was aware and had spoken with his daughter about the
incident. He stated that his daughter had previously told him that
she was hired to model lingerie at a Palm Beach mansion. Mr. [REDACTED]
stated he knew nothing else about what she did when she went to
"work." Mr. [REDACTED] advised he would cooperate with the investigation
and make his daughter available for interviews. I asked if she was
available for an interview, [REDACTED] stated she was not at home at the
moment. I informed him I would make contact with her at a later time.
Mr. [REDACTED] expressed his interest in the resolution in this matter
as he stated this information has affected his daughter emotionally.

On January 4, 2005, I acquired the subpoenas from the State Attorney's
Office for Cingular Wireless, Metro PCS, Verizon, Bell South
Telecommunications and Sprint for the unknown telephone numbers from
Sarah Kellen's cellular telephone. The subpoenas were sent to the
respective telephone carriers for subscriber information.

I received a telephone call from State Attorney's Office, who informed
me that the former houseman for Jeffrey Epstein, Alfredo Rodriguez,
was present at the State Attorney's Office for an interview.
Rodriguez was issued an investigative subpoena for an interview on the
on-goings at Epstein's house during his employ. I responded to the
State Attorney's Office and encountered Mr. Rodriguez waiting in the
lobby. I brought Mr. Rodriguez to the interview room.
During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months. He was referred by associates and his employment lasted the months of November 2004 through May 2005. His responsibilities as house manager included being the butler, chauffeur, chef, houseman, run errands for Mr. Epstein and provide for Epstein's guests. Rodriguez advised he had very limited contact with Mr. Epstein. If Rodriguez needed to relay a message to Mr. Epstein, he would have to notify Epstein's secretary "Leslie" in New York City, who would then notify Epstein's personal assistant, Sarah, who would relay the message to Epstein. Rodriguez stated Epstein did not want to see or hear the staff when he was in residence.

I asked Rodriguez if Epstein received many guests during his stay in Palm Beach. Rodriguez advised he had many guests. I asked specifically about masseuses coming to the house. Rodriguez stated he would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either Sarah or Epstein would meet with them.

Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either Sarah or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. He advised he didn't ask their ages but felt they were very young. Rodriguez stated they ate like his own daughter who is in high school. Rodriguez stated they would eat tons of cereal and drink milk all the time. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [redacted] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would clean Mr. Epstein's bedroom after the alleged massages and would discover massager/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's bed.

Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house. Rodriguez referred himself as a "human ATM machine" and was ordered by Epstein to maintain a minimum balance of $2,000 dollars on him at all times. When a girl would come by the house and Mr. Epstein was either not in residence or was not at home at the time, Rodriguez was to provide the girl (masseeuse) several hundred dollars for their time and to notify Epstein the amount they were given. Epstein also ordered Rodriguez to
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(Continued)
purchase several gifts and provide them as tips to the girls. I asked what kind of gifts. Rodriguez stated he purchased IPODS, jewelry, anything the girls would want.

Rodriguez stated the amount of girls that came to the house was approximately fifteen. Each of the girls knew each other and all seemed to know at [redacted] High School who Mr. Epstein was. When asked to identify these girls, Rodriguez stated he could not at the moment but knew they wrote their names down on a journal he kept during his employ with Mr. Epstein. He kept a journal in the event he needed to explain either to Mr. Epstein or his assistants what was done at the house or who visited the house as he stated he was in-charge of Mr. Epstein's personal security while in Palm Beach. I informed him I would need to view this journal to which he stated he would research the book and contact me to provide the book. The interview was concluded and left the area. I returned back to the police station where the micro cassette was placed into evidence. At approximately 7:20 pm, I was notified Rodriguez located the journal and would call me on January 5, 2005 to provide the journal.

Investigation Continues:

**************************** NARRATIVE  # 34 ****************************

NA

Reported By: RBCAREY, JOSEPH

Entered By: ALTOMARO, NICKIE A.

1/09/06
1/10/06

On January 5, 2006, I attempted to meet with Alfredo Rodriguez to recover the folder or journal in which he kept the notes that were given to him during his employ with Mr. Jeffrey Epstein. He kept this folder to justify what he did during his employ should the need arise to justify what occurred with the monies he had to keep or any questions as to the petty cash he withdrew from the household account from the bank. At approximately 10:00 pm, I attempted contact with Mr. Rodriguez and discovered he was assisting his wife at her place of employment and would not be able to meet with me. Mr. Rodriguez stated he would meet with me on January 6, 2006, in Broward County, in the morning hours.

On January 6, 2006, at approximately 9:00 am, I received a telephone call from Mr. Rodriguez who advised he had the file in hand and would be traveling northbound to meet with me in Broward County. At 10:50 am, I met with Alfredo Rodriguez at the parking lot of Bank of America in Boca Raton on Yamato Road and Military Trail (known as the Polo Center). Rodriguez produced a green folder which contained documents, a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [redacted] High School after high school drama performance. Also in that same note was direction to rent a car for [redacted] and direction to extend the rental contract. I returned to the Palm Beach Police Station and placed the folder into evidence.

I received a fax from Verizon from the subpoena request sent on
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01-04-06, for telephone number [redacted] The phone number is registered to Dr Perry Bard, from West Palm Beach. Dr. Bard is a chiropractor and has an office located [redacted] in West Palm Beach. The cellular number is Dr Bard's personal cellular number.

On January 9, 2006, Det. Caristo and I traveled to [redacted] in Palm Beach Gardens in an attempt to locate Johanna Sjoberg, who had been previously seen on the property and identified through her Florida Drivers License and Florida license plate. A business card was left for her to return my call. We then traveled to the [redacted] Foundation and located [redacted]. [redacted] agreed to speak with us and in a private room within the school provided us a taped statement.

During the statement, [redacted] advised that when she was fifteen or sixteen years of age, she was taken to Jeffrey Epstein's house by her associate, [redacted]. [redacted] stated this occurred late May 2004 or early June 2004. She was told she could model lingerie for money for a wealthy Palm Beacher. She remembered they traveled by yellow cab from their residence in West Palm Beach to Epstein's house. She remembered encountering Epstein at the front door during the evening hours.

He introduced himself and brought them into the kitchen so that the chef could prepare something for them to eat. After having a meal, [redacted] and Epstein brought [redacted] upstairs to a master bedroom which had a large bathroom. She observed a large style shower, sauna and there was a large massage bed also in the bathroom. Epstein entered a room within the bathroom and came out wearing only a towel. [redacted] said they would provide a massage on his feet. [redacted] asked why they are doing this. [redacted] told her this was part of the routine and told her to rub his legs and calves. Epstein had told [redacted] to get comfortable. [redacted] continued rubbing Epstein's calves and feet. At Epstein's direction, [redacted] then left the room leaving [redacted] there by herself. Epstein told [redacted] to get comfortable. [redacted] removed her blouse and pants and stayed in her panties. [redacted] stated she was not wearing a bra. She believed she was wearing thong panties. Epstein turned over onto his back and began touching her. Epstein touched her breasts and began touching her in her vagina area. Epstein instructed her to rub his chest and rub his nipples. [redacted] stated the touching consisted over the panties on the first time; he stroked her vagina but stayed on top of the panties. During the first massage, she stated Epstein was stroking her and began masturbating himself at the same time. He put his hands under the towel and appeared as to masturbate himself however she never saw his penis. She continued rubbing his chest until he grabbed her and pulled her closer to him. He appeared to have climaxed because after he pulled her closer to him the massage was over. Epstein had told her that there was two hundred dollars for her on the dresser. He told her that she could not tell anyone what happened at the house or bad things could happen. [redacted] stated she went to Epstein's house three
Case No. . . : 1-05-000368 or four times total. [redacted] was very scared and felt very nervous. She knew because of Epstein's money he was powerful. After the massage, Epstein ordered his houseman at the time to drive the girls home. The employee was to drop off the girls at their house and watch them go inside their house.

[redacted] could not remember who the houseman was. She stated Epstein and his assistant Sarah would call her at her father's house to arrange for her to come and "work." She advised each time she returned to the house, Epstein would do the same thing. [redacted] stated it was a routine with Epstein. She would rub his feet and calves. He would then turn over and begin to touch her on her vagina area. The only difference was that it was done without panties. Epstein's fingers would stroke her vagina area as he would masturbate and finally climax and the massage would be over. She was paid $200.00 each time she went. Each time she went she was reminded not to speak of what happened at the house and that she would be contacted again. She began to purposely miss the calls when either Sarah or Epstein would call her. She once brought a friend, [redacted] unknown last name, to work for Epstein. She was paid $200.00 for bringing [redacted] stated she no longer returned to work for Epstein. She also stated that she wanted to notify the police of what happened at the house. [redacted] stated she was scared of what could have happened to her or her family if she notified authorities.

On January 10, 2006, I received the results from the subpoena from BellSouth Telecommunications for telephone number [redacted]. The number is assigned to [redacted]'s father in Palm Beach Gardens. I also received the results from Western Union which confirmed the money order sent to [redacted] from Jeffrey Epstein in New York City. The "wire" was sent by Jeffrey Epstein of 457 Madison Ave in New York City on December 23, 2004 at 12:05 pm. The amount of $222.00 was charged to Epstein's credit card so that [redacted] could receive $200.00 in Royal Palm Beach. The twenty-two dollars was for processing and local fees to send the money via Western Union. A copy of the check presented to [redacted] was also attached to the receipt of the wire. This confirmed what [redacted] advised she received as a Christmas bonus from Epstein.

Investigation continues.

****************** NARRATIVE # 35 ******************

NA
Reported By: RECAREY, JOSEPH 1/10/06
Entered By.: ALTOMARO, NICKIE A. 1/10/06

I received and reviewed the Cingular Wireless results from the subpoena requests for subscriber information for telephone numbers [redacted]. The first number, [redacted] is assigned to Janusz Banasiak in care of Jeffrey Epstein of 457 Madison Ave in New York City. Banasiak is the current houseman/house manager for 358 El Brillo Way in Palm Beach, Fl 33480. The second number, [redacted] is assigned to Christina Veniero of...
(Continued)
West Palm Beach. Research conducted on Venero revealed she is a licensed Massage therapist with a Florida conditional/active license number. Venero had been previously arrested for battery / unwanted touching and DUI. Requests for copies of the reports involving the arrests were requested from the Palm Beach County Sheriff’s Office. The last number is assigned to Thomas Rofrano of Palm Beach Gardens.
Research on Mr. Rofrano, revealed that he is a Florida Chiropractic Physician.

Vehicles that were previously documented on the property while surveillance was being conducted were researched. I determined a tan Chevrolet Camaro, bearing Florida license , was seen on the property in which a young white female was seen entering the Epstein property. Research was conducted which revealed that the vehicle is registered to . Mr. has two daughters, residing with her father in Lake Worth. Research on revealed she was recently involved in a traffic stop in Lake Clarke Shores in May 19, 2005. A request to discover any information from the stop was requested.

I spoke with ASA Daliah Weiss who informed me that Janusz Banasiak will be available for an interview tomorrow at the State Attorney’s Office in West Palm Beach at 1:30 pm. I informed her that I would be at her office for the interview.

On January 19, 2006, Det. Caristo and I met with Johanna Sjoberg at Palm Beach Gardens. Sjoberg was identified as a licensed massage therapist who had previously been seen on Epstein's property when physical surveillance was done. Sjoberg was told of the on going investigation and I felt she may have information pertaining to the case. During a sworn taped statement, Sjoberg stated she met Epstein three years ago when Ghaine Maxwell approached her while she was attending Palm Beach Atlantic College to work around Epstein’s house. Maxwell had told her that they needed some girls to work at the house to answer phones and run errands. Sjoberg accepted the job and began working at Epstein's house on El Brillo in Palm Beach. Sjoberg stated it was a part time job during the time she was on El Brillo in Palm Beach. Sjoberg stated she continued going to Epstein’s house and would be notified when Epstein would travel to Palm Beach. Sjoberg advised she would be notified by Maxwell, Epstein or Sarah, his assistant, when he would travel to Palm Beach. Sjoberg stated she began providing massages to Epstein before she became a massage therapist. She continued giving massages not only to Epstein but to Nadia Marcinkova, and Sarah, his assistant. Sjoberg was asked about what occurred during the massages. Sjoberg stated as she was twenty
three years old when she met Epstein, anything that happened was
between two consenting adults. I explained to her that she was not in
any trouble however as part of this investigation, I needed to ask
certain questions. Sjoberg stated that there were times that Epstein
would ask her to perform during the massage. He would instruct her to
rub his nipples as he masturbated himself. Sjoberg stated she felt
"grossed" about the behavior but as she was getting paid, she just
continued. Sjoberg also advised she would on occasion perform the
massages naked. Epstein would on occasion, utilize the
vibrator/massager on her vagina area when she performed the massages.
Sjoberg explained that Epstein never exposed himself to her as he
maintained himself covered under the towel he would be wearing. When
Epstein would masturbate he would be covered.

I asked if Sjoberg ever received any gifts, or any gratuities from
Epstein. Sjoberg advised aside from being paid well, she advised
Epstein took care of her tuition from Palm Beach Atlantic College.
She received a rental car for a week when her scooter broke down.

Additionally she received other gifts from Epstein. Epstein also
recommended her to another client who resides at Breakers Row in Palm
Beach. The client she was referred to was "Glenn" unknown last name,
and his wife, who she provided a massages to. The statement was
concluded and placed into evidence upon our return to the Palm Beach
Police Department.

While at the police station, I researched Florida tag [redacted] which
was also previously seen on the property when there was physical
surveillance being done at the property. The vehicle is registered to
[redacted] Lake Worth, Florida. Researching Mr. [redacted] and the
vehicle revealed that his daughter, [redacted] had been driving
the vehicle and was cited for unlawful speed in Lake Clark Shores.
The vehicle is a tan, Chevrolet Camaro, 2-door. I researched
[redacted] date of birth, 1987, resides at [redacted]. In her space page called
[redacted] has a page of the woman photographed at a beach. An interview is forthcoming.

A review of the video disks which was extracted at the Palm Beach
County Sheriff's Office Computer Crime Unit revealed that only one
hidden camera was functional at the time. Several images of Epstein
working at his office were seen. Additional footage of Sarah Kellen
and Nadia Marcinkova was seen. There was other footage of females
seen. The identity of the females is unknown at this time, until such
time as I meet with certain females to show the video footage to
confirm if, in fact, it is them on the video. At this time it appears that
[redacted] and Haley Robson are seen sitting with Epstein beside
his desk in the evening hours. Due to poor lighting, a direct
confirmation cannot be made at this time.

Inv. Continues.
On January 25, 2006, Det Caristo and I responded to
and met with
stated last
year, when she was seventeen years of age, she met Jeffrey Epstein
through her former room mate
was allegedly dating
Epstein at the time.
and
had once cohabitated together
when they modeled.
explained
called her on her telephone
and advised her that she was in Palm Beach and requested to see her.
arrived and met Epstein and
and went to the Palm
Beach Mall together and went shopping.
advised that
and
she had received money from Epstein to go to the mall. They visited
Victoria's Secret and purchased undergarments from the store utilizing
monies given by Epstein.
advised she purchased one item and
purchase various items. The money used to purchase the items
was the money given by Epstein.

and
continued shopping and having a day together.
explained how she and Epstein have been dating each other
and he has been paying all of her bills. advised
they met in New York and had been dating ever since. They later
returned to Epstein's home and encountered Epstein. He had a brief
conversation with about her modeling career. He knew of her
modeling career from
He requested to see her modeling
portfolio and explained that he could help her with modeling jobs.
had her book with her to show and showed the book to
Epstein. He commented negatively about her photographs and portfolio.
 felt uncomfortable with the comments made as she had been
working with other professional modeling companies who had offered her
work from her photographs. Epstein requested to see what was
purchased at the mall. took out the undergarments which were
purchased. She immediately showed Epstein different sets purchased.
Epstein then requested to view what was purchased. was
reluctant to show the outfit however since it was Epstein's money that
purchased the item she pulled it out of the bag. Epstein asked her
to try it on. who told her "yeah, try it on."
Feeling compelled to try the undergarment outfit on; she went to
another room and put on the bra and panty set. She walked out to the
living room where they were sitting, and modeled the suit. She then
went back into the other room and changed back into her clothes.
returned into the room and told her she would be going home.
scheduled another day for to return for massages with her.

stated within that same week, she returned to meet with
and have a massage. had told her that she would be unable to
stay with her as she would be going on a bike ride with Epstein.
explained she could stay at the house and take advantage of the
massage.
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stated she met with an unknown massage therapist and had the table already set up in a guest room. removed her clothing, leaving her panties on, and wrapped herself with a towel for the massage. remembered that the door to the guest room was closed but not locked. As the therapist was working her back, the door was opened by Epstein and entered into the room. was trying to conceal herself as Epstein was talking to her about his chiropractic session. Epstein told turn over onto her back. eventually turned over exposing her breasts to Epstein as he applied pressure on her shoulder and her waist. stated Epstein "popped" her back. removed her self from the table, got dressed and left the house. further stated had attempted to call her on several occasions to invite her back to Epstein's house to which replied "I'm busy." advised she has not had contact with either or Jeffrey Epstein. It should be noted that her mother, was present during the interview. The interview was concluded and we thanked them for their time.

On January 27, 2005, I made telephone contact with Christina Venero, at . Venero is a licensed massage therapist who had frequented the home of Jeffrey Epstein. Ms. Venero has been unable to meet with me in Palm Beach County, and because she lives and works in Port St Lucie, a telephone interview was conducted. I explained to Ms. Venero that there was an on going investigation involving Jeffrey Epstein.

Venero stated she knows Epstein and has been employed by him for approximately three years. Epstein has paid Venero to perform Swedish Massages (Deep Tissue) on him and other guests. Venero explained that approximately three year ago she met Ghislaine Maxwell and Jeffrey Epstein through a mutual friend. Epstein and Maxwell were looking for a massage therapist. Venero stated since that time, she is notified when Epstein is coming to Palm Beach. Venero stated she comes to his house and provides the massage or massages. Venero explained she has also massaged his guests and assistants. Venero continued that she is paid $100.00 and hour for the massage.

I asked Venero if anything occurred during the massage that would have made her feel uncomfortable. Venero stated she only provided massages and that was it. She never was approached for anything else. I asked if Epstein ever asked her to rub his chest she stated she would not rub his chest as that is not part of her massage. Venero explained that she was not Epstein's type. The girls she would see at Epstein's house were very thin, beautiful and without tattoos. Venero explained she has several tattoos that are visible. Maxwell and Epstein have commented negatively about her tattoos previously when she has provided massages.
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Date: 7/25/06  
Time: 8:47:53  
PALM BEACH POLICE DEPARTMENT  
Incident Report  
Program: CMS301L  

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(Continued)

Venero stated she only provided massages for Epstein and his associates and nothing happened during those massages. Venero stated as she does Swedish style massages, the patient is usually sore after the massages. I thanked her for her assistance and the interview was concluded at this time.

I received a facsimile from T-Mobile Cellular service on telephone number [redacted], which is assigned to David Rodgers, pilot for Mr. Epstein, who resides in Lake Worth. Rodgers' telephone number was dialed on several occasions by Sarah Kellen. A background on Rodgers indicated he has a valid FAA pilot license First Class for the Southern FAA Region. Rodgers has another historical FAA license for Airline Transport Pilot.

Investigation Continues.

NARRATIVE  
# 39  

Reported By: RBCAREY, JOSEPH  
Entered By.: ALTOMARO, MICKIE A.  
2/14/06  
2/16/06

On Friday, February 3, 2006, I had made arrangements to meet with [redacted] at the Palm Beach Police Station. At approximately 1:00pm, [redacted] and her friend, [redacted] arrived at the police station. During an interview with [redacted], she stated she met Epstein when she turned eighteen years old and was brought to Epstein's house to provide a massage. She advised this occurred on May of 2005. She advised Haley Robson had informed her if she wanted to provide a massage for $200.00. [redacted] agreed and was brought to Epstein's house to provide a massage. [redacted] stated she had been to the house on many occasions during the massage sessions. [redacted] also stated she would remove her clothing to provide the massage on Epstein. [redacted] advised Epstein would pay her $300.00 to rub his back, legs and chest. During the massages, Epstein would masturbate himself as she rubbed his chest. I asked her if Epstein ever touched her breasts during the massages. [redacted] replied, "Yes." I asked her if Epstein ever touched or massaged her vagina. [redacted] stated he had on several occasions. I asked her if he ever penetrated her with either his penis or any other objects. [redacted] stated that during a massage he inserted his fingers in her vagina as she massaged him. She stated this occurred one time only. [redacted] stated the massage would be over when Epstein would climax onto a towel. I asked [redacted] if she had any formal massage training to which she replied that she did not. [redacted] was then asked if she ever brought anyone to the house to "work." [redacted] stated she brought two people to the house. She advised she received money for bringing people to the house to "work." [redacted] stated she brought a girl named [redacted] and her friend [redacted] was still waiting for [redacted] in the lobby of the police station. I thanked [redacted] for her time and her cooperation and escorted her to the lobby.

I asked Ms [redacted] if I could speak with her about this investigation. I
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brought her to the interview room and explained to her that I was conducting an investigation on Jeffrey Epstein and felt she may have information pertaining to the investigation. Ms [redacted] identified herself as [redacted] and resides in Wellington, Florida. She advised approximately a year ago she was brought to Epstein's house to provide a massage for money. [redacted] stated she needed to make money and felt it was a quick way to make some money. [redacted] stated she was brought to the house by [redacted] and was introduced to Epstein and his assistant. She was brought to his main bathroom and provided a massage. I asked her if she provided the massage naked. [redacted] stated she did. She rubbed Epstein's legs, back and chest. I asked [redacted] if Epstein touched her during the massage. She advised he did not, however he did masturbate himself as she rubbed his chest. Once he climaxed the massage was over. She was paid her money and left the area. [redacted] advised it occurred one time and she never returned to Epstein's house. The interview was concluded and [redacted] was escorted to the lobby.

I located a telephone number for [redacted] and attempted to contact her on several occasions. I called her on two occasions and spoke with Ms. [redacted] who advised she would speak with me in Deerfield Beach where she resides. Due to a scheduling conflict, we were unable to meet. I informed her I would contact her to schedule another appointment to speak with her about this investigation. I have attempted to meet with her and make telephone contact with negative results.

On February 13, 2006, I met with David Rodgers at [redacted] in Lake Worth. Rodgers was identified as Epstein's pilot. I spoke with Rodgers who advised he has been employed with Epstein since 1991. He flies both planes for Epstein depending where he wants to fly to. Rodgers was asked about passengers in the plane he flies. Rodgers stated unless Epstein flew to his island off of St Thomas, there would be no way of knowing who the passengers were. I mentioned a recent flight to Ohio, where Rodgers flew to Ohio to pick up [redacted]. Rodgers stated he recalled flying on several occasions and did remember [redacted]. Rodgers stated once he is in the cockpit, he does not know who the passengers are. When he prepares the passenger manifests, he lists Epstein and his assistants he knows by name, Sarah and Adrianna. Rodgers stated he would list either female or male passengers on the manifests only to keep a count on the passengers. Mrs. Rodgers came into the living room and recommended that her husband consult with an attorney. Mr. Rodgers agreed he would speak with the family attorney to inform him of this questioning. I explained to Mr. Rodgers that he was not the suspect in this investigation and ceased all questions. Based on the fact Rodgers could not advise who passengers were in the plane, I then left the area.

I attempted to locate [redacted] at [redacted] in Wellington. I left my business card for her to return my call. On February 14, 2006, at 12:06 pm, I received a call back from Ms. [redacted]
(Continued)

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on my voice mail. Ms. [redacted] left her telephone number for a return call [redacted]. I left her a message to return call.

Investigation Continues...

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NARRATIVE # 40 **********************************************************************

NA
Reported By: RECAREY, JOSEPH
2/21/06
Entered By: ALTOMARO, NICKIE A.
2/22/06

On February 15, 2006, I made telephone contact with [redacted] who provided directions to where I could locate her. Det Caristo and I responded to [redacted] in Lake Park to meet with [redacted]. Upon my arrival, I met with [redacted] in the parking lot directly behind MARCO Auto Painting. She was advised I was there to speak with her about an ongoing investigation that concerned Jeffrey Epstein in Palm Beach. [redacted] stated she knows Epstein very well and did not want to speak with me about Mr. Epstein. She was very fond of Epstein and did not want to speak with me about anything concerning Jeffrey Epstein. I explained to her that she was seen at the house and I would like to speak with her. She stated she knew there was an investigation and that I had spoken with other people and therefore I should know what happened at Epstein's house. [redacted] ended the conversation and walked back into her boyfriends business, Blanton Automotive. Det Caristo and I left the area and returned to the police station.

Investigation continues.

**********************************************************************
NARRATIVE # 41 **********************************************************************

NA
Reported By: RECAREY, JOSEPH
4/10/06
Entered By: ALTOMARO, NICKIE A.
4/10/06

A Grand Jury Session was requested during the month of February 2006, in which all the girls that had been interviewed would have been called to testify before the Grand Jury to seek an indictment against Jeffrey Epstein. Due to subsequent meetings with the State Attorney's Office and Defense Attorney Alan Dershowitz the Grand Jury was postponed until a later time. Dershowitz had provided a package of material on the main victims in this case in which they appear on myspace.com and speak about alcohol use and some marijuana use. The State Attorney's Office wanted time to review the material.

I requested additional subpoenas from the State Attorney's Office in which I requested information from Dollar Rent a Car and Jet Aviation. The information requested from Dollar Rent a Car was for the rented vehicle by Alfredo Rodriguez while under the employ of Epstein for one of the victims. The other subpoena requested was for Jet Aviation for dates and times when Epstein's planes were in Palm Beach County.

I continued to research other names that were acquired either from interviews or intelligence gathered during the investigation. I
Case No. . . . : 1-05-000368 (Continued)

located in Royal Palm Beach. I responded to Royal Palm Beach. During the interview, stated she knew I would be speaking with her. She stated she was first introduced to Epstein when she turned eighteen years old. She stated she was sure of her age as it was her senior year in High School. She advised she was brought there to make money and was told she would have to provide a massage to this Palm Beach guy. She remembered she met Epstein and his assistant Sarah in the kitchen area. She stated she was taken by one of her friends, She stated she went upstairs with Sarah while Epstein got ready for the massage. He exited his bathroom naked and turned around. Epstein asked her if being naked offended her. She stated it made her uncomfortable. Epstein then put on a towel and lay on the table. She stated she rubbed his back and feet. She stated she had no massage training or experience. She stated during the massage, Epstein attempted to touch her buttocks. She pulled away as he touched her buttocks. She told him again she was uncomfortable with him touching her. Epstein then cut the massage short and became upset with her. Epstein paid her $200.00 for the massage and told her to leave the house. She never returned to the house. She did advise of one time she went with however she waited in the car for as she did not want to go into the house. At the conclusion of Epstein's visit with Epstein they left the area. She stated she had heard from other girls that have gone to the house that Epstein now required them to do the massage naked and allow him to touch them in their private areas for monies. The interview was concluded as did not have any other information to provide.

I then learned from the original victim, the defense attorney had learned of her identity. I spoke with the father of the victim, who stated there has been a private investigator on his house photographing his family and chasing visitors who come to the house. He provided a Florida License of This vehicle is registered to Ivan Robles of West Palm Beach. Robles is a private investigator intern who is licensed by the state. I informed the State Attorney's Office of the above information.

I received the Grand Jury subpoenas to be delivered to three victims for a Grand Jury session to be held on April 18, through April 20, 2006.

Investigation continues.

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NA  Reported By: RECGARY, JOSEPH  4/14/06
     Entered By: ALIOMARO, NICKIE A.  4/18/06
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The Grand Jury Subpoenas were personally served to the individuals they were issued to. On April 5, 2006, at approximately 7:30 p.m., I personally served the parents of who had informed me that the private investigators were still photographing the family. On April
10, 2006, at approximately 2:30 p.m., I served [redacted] at her residence in Royal Palm Beach. The subpoena was given to her mother, [redacted].

I learned through one of the victims [redacted] that she was personally contacted through a source that has maintained contact with Epstein. The source assured [redacted] she would receive monetary compensation for her assistance in not cooperating with law enforcement. AH also stated she was told, "Those who help him will be compensated and those who hurt him will be dealt with." I told [redacted] that tampering with a witness/victim is an arrestable offense and very serious. I asked her who approached her during this encounter. [redacted] originally was reluctant to provide the name of the person who approached her to offer her not to testify because she felt they were still friends.

On April 11, 2006, Det Dawson and I traveled to Tallahassee, Florida and met with the victim, [redacted] identified [redacted] W/F, [redacted], as the person who approached her in Royal Palm Beach while she was home during Spring Break in March 2006. [redacted] also stated she did not want to pursue the intimidation charges on [redacted] was concerned that the defense attorney was given a copy of the report as certain things she had told me in confidence were repeated to her by [redacted]. Prior to our departure, the victim was given a copy of her subpoena for the Grand Jury which was scheduled to commence April 18, 2006.

Upon our return from Tallahassee, I notified the State Attorney's Office of what was told to me. I also notified them that the subpoenas were delivered to the witnesses and they would be calling for arrangements for the date and time needed for the Grand Jury. I spoke with ASA Weiss and informed her of the possible intimidation by the defense.

On April 13, and April 14, 2006 I attempted contact on several occasions with ASA Weiss and ASA Belohlavic to ascertain when the victims needed to report for Grand Jury testimony. Messages were left on their voicemail. On April 17, 2006, during the hours of 9:00 am and 11:30 am, I again left messages for ASA Weiss and ASA Belohlavic for either of them to return my call as I had not heard from the State Attorney's Office as to the time and date of the Grand Jury.

At approximately 12:30 pm, I went to the State Attorney's Office and located ASA Weiss and ASA Belohlavic in their offices. I entered ASA Belohlavic's office who informed me that she was going to return my call. She explained that an offer was made to the defense, Atty Guy Fronstin and Atty Alan Dershowitz. The offer is 1 count of Agg Assault with intent to commit a felony, five years probation, with adjudication withheld. Epstein would have to submit to psychiatric/sexual evaluation and no unsupervised visits with minors.

When asked about the all the other victims, ASA Belohlavic stated that was the only offer made as to one victim, [redacted] ASA Belohlavic cell phone rang and went to voice mail. She checked her voice mail and played the message on speaker. The caller identified himself as...
Case No. . . . : 1-05-000368

(Continued)

Atty Guy Fronstin and acknowledged the deal made between them. Fronstin stated in the message, he spoke with his client, Jeffrey Epstein, and agreed to the deal. Fronstin asked to call off the grand jury as they would accept this deal. Belohlavik stated a probable cause would be needed to book Epstein in the county jail and would let me know as to when it would be needed. I explained my disapproval of the deal and not being consulted prior to the deal being offered. However I expressed that was only my opinion and the final approval would come from the Chief of Police. She explained to have Chief Reiter call Barry Krisher about the deal. I left the area and returned to the police station where I briefed the Chief about the deal offered.

I checked my voice mail messages and discovered a message from [redacted] stepmother for the victim [redacted] She was calling because the State Attorney's Office still had not returned any of her calls as to when they are needed for this case. I then called ASA Belohlavik's office and left messages for her to call the victims on this case and explained to them what the State Attorney's Office had done.

On April 17, 2006, at approximately 4:30 pm, State Attorney Investigator Tim Valentine called to officially notify me of the cancellation of the Grand Jury. He requested I contact the victims that had been served to appear, to notify them of the cancellation. I advised Valentine that as this Grand Jury session was called based on the State Attorney's Office decision to have the victims heard by the Grand Jury that I felt it was the States Attorney's Office responsibility to contact the victims and advise them of the reason they were no longer needed.

*********************** NARRATIVE # 43 ***********************

NA

Reported By: RBCARRY, JOSBFIH

Entered By: ALTOMARO, NICKIE A.

As I had not received any contact from anyone at the State Attorney's Office, on May 1, 2006, I prepared three arrest warrant requests and submitted them to the State Attorney's Office. The packages were delivered to the Crimes Against Children Unit in care of ASA Lana Belohlavek. Jeffrey Epstein's arrest warrant was requested for 4 counts of Unlawful Sexual activity with certain minors and one count of Lewd and Lascivious Molestation. Sarah Kellen, Epstein's assistant's, arrest warrant request was for 4 counts of Principal in the 1st degree Unlawful Sexual activity with certain minors and one count of Principal in the 1st degree Lewd and Lascivious Molestation. Haley Robson's arrest warrant request was for Lewd and Lascivious Acts on a victim under 16 years of age. The receipt of delivery was signed and brought back to the records division at the police department.

On May 3, 2006, at approximately 2:54 pm, I received a telephone call from ASA Daliah Weiss on my cellular telephone. ASA Weiss advised she
Date: 7/25/06
Time: 8:47:53
Palm Beach Police Department
Incident Report
Page: 85
Program: CMS301L

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(Continued)
has been taken off the Jeffrey Epstein case because her husband is
employed with Attorney Jack Goldberger. Attorney Goldberger is the
attorney of record for Jeffrey Epstein. His previous attorney, Guy
Fronstin, has been fired from representation. ASA Lana Belohlavek has
been assigned the case. ASA Weiss stated she can no longer speak
about the Epstein case with me. I thanked her for her telephone call.
ASA Weiss further stated that ASA Belohlavek would be calling me.

************************** NARRATIVE # 44 **************************
NA
Reported By: RECarey, Joseph
Entered By: ALTOMARO, Nickie A.
5/15/06

On May 10, 2006, information was received that Epstein's associate,
Leslie Wexner, The Limited Inc, CEO's, plane had arrived in West Palm
Beach, PBI. The plane, a Gulfstream 4 bearing a N900LS registration,
was on the tarmac at Galaxy Aviation. As Epstein had recently
acquired the services of a new attorney, and the fact that Epstein's
house is currently under remodeling, it was believed that Epstein may
be in Palm Beach. I conducted physical surveillance at the residence,
358 El Brillo Way. I observed a large construction crew conducting
remodeling at the house. The contractor, David Norr, was observed
driving a Ford Explorer, white in color. The vehicle has a Florida
registration of #3OQQR. Norr left Epstein's house and traveled north
on County Road. Det Caristo and I conducted surveillance on Norr.
Norr traveled to several construction sites and checked on certain
jobs. Surveillance was discontinued on Norr and Det Caristo and I
traveled to Galaxy Aviation. I observed the white plane with a blue
stripe along the body and tail of the plane; the tail number was
visible on the bottom of the tail, closer to the body of the plane.
We maintained visual surveillance on the plane until 4:57 p.m., when a
caravan of Cadillac Escalades drove onto the tarmac. We observed
several people exit the vehicles and discovered that they were part of
the executive team for Limited Inc. The executives were in Palm Beach
County for an executive meeting for the day. They arrived in Palm
Beach County on May 9, 2006 at 9:30 pm and were scheduled to leave on
the 10th at 5:00 pm.

On May 12, 2006, I met with ASA Lana Belohlavek at the State
Attorney's Office. She explained that her boss, Barry Krischer, was
requesting this case be taken to the Grand Jury again. I explained to
her I had requested arrest warrants for Jeffrey Epstein, Sarah Kellen,
and Haley Robson. I asked that she either issue the warrants or
direct file, as so much time has elapsed since the original request to
the Grand Jury. I explained that the Palm Beach Police Department had
concluded the case in December of 2005 and has been waiting for the
case to go forward. Belohlavek stated the original offer was again
offered to the new defense attorney. She was waiting for their answer
by Friday May 19, 2006. She stated she would advise me of the answer.

************************** NARRATIVE # 45 **************************
NA
Reported By: RECarey, Joseph
6/05/06

GIUFFRE005698
CONFIDENTIAL
On May 22, 2006, I received several phone calls throughout the day from Mr. [Name], who stated he had been followed aggressively by a private investigator. Mr. [Name] stated that as he drove to and from work and running errands throughout the county, the same vehicle was behind him running other vehicles off the road in an attempt not to lose sight of Mr. [Name]'s vehicle.

I explained to him as Mr. Epstein had retained new legal council it was possible it would be new private investigators following him to observe his daily activities. I also explained to him that there was a meeting scheduled with ASA Lana Belohlavek and Attorney Jack Goldberger at Mr. Krischer’s office scheduled on June 1, 2006 at 9:00 am. I attempted to call ASA Lana Belohlavek to inform her of the private investigators following Mr. [Name], however; she was on her vacation during the week of May 22 through May 30 2006.

On May 23, 2006, I received other phone calls from Mr. and Mrs. [Name] who advised they were able to acquire the private investigators license plate information. The subject following them was again driving very aggressively and caused Mrs. [Name] to run off the road. Mrs. [Name] stated the vehicle is a green Chevy Monte Carlo bearing Florida tag [Redacted]. The vehicle is registered to Zachary Bechard of Jupiter Florida. Bechard is employed with Candor Investigations from Jupiter, Florida. Bechard is a licensed Private Investigator in the State of Florida.

Since the discovery of the threat made against one of the victims in this case [Redacted] I requested subpoenas for all calls made to and received from [Redacted] during the month of March 2006 for her cell phone and home phone. I had confirmed with Florida State University the exact dates of Spring Break for 2006. The Spring Break was from March 4, 2006 through March 12, 2006. I received a subpoena from Sprint/NexTel with all calls made during the month of March 2006. I reviewed the 989 calls made and received during the month of March 2006. I observed on March 7, 2006, [Redacted] made and received thirty five calls during that day.

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The table reflects the date of the calls, time of day (EST), duration
Case No. . . : 1-05-000368

(Continued)
of call in seconds, inbound or outbound calls and calls made to or
from [redacted] phone. On March 7, 2006, at 11:03 am, [redacted] made a call
to the victim [redacted] which lasted 492 seconds (8 minutes and 2 seconds).
The victim then returned the call at 11:16 am which lasted 6 seconds.
The victim then made contact with [redacted] at 11:22 am for 877.2 seconds
(14 minutes and 6 seconds). These sequences of calls were consistent
with what the victim had described to me on the date of the
intimidation. Immediately after speaking with the victim, [redacted] makes
a call to Sarah Kellen, Epstein's assistant, which lasts for
forty-eight seconds. A call is then immediately received, a telephone
number registered to a Corporation affiliated with Jeffrey Epstein
located at 457 Madison Ave in New York. An extensive computer check
revealed 457 Madison Ave is a business address in which Epstein has
his corporations assigned to. Epstein had corporation attorney,
Darren Indyke, register the businesses and register himself as an
agent. I also observed Epstein has his El Zorro Ranch Corporation,
New York Strategy Group, Ghislaine Corporation, J Epstein and Company
and the Financial Strategy Group registered to this same address.
Finally, a third call is received by [redacted] at 12:02 pm from the same
Corporate number which lasts 12 minutes and 1 second. It should be
noted that there is no further contact with either the victim during
the month of March or April of 2006. I also noted that there was no
further contact with Sarah Kellen or Jeffrey Epstein during the
remainder of the month of March or April 2006.

On June 1, 2006, ASA Lana Belohlavek telephoned me to inform me of the
meeting that occurred with Atty. Jack Goldberger and her reference
this case. She advised she would make her determination on whether to
file on this case or not by Monday June 5, 2006.

Inv Continues.

****************** NARRATIVE # 46 ******************
NA
Reported By: RECAREY, JOSEPH 7/12/06
Entered By.: ALTOMARO, NICKIE A. 7/12/06

On June 29, 2006, I had spoken to ASA Lana Belohlavic who informed me
that the case would be sent to the Grand Jury for charges. She
informed me that the grand jury would convene on July 19, 2006 to hear
the Epstein case. Belohlavic stated State Attorney Barry Krischer made
the determination to go to the Grand Jury to hear the case.

On July 12, 2006, I spoke with Mrs. [redacted], mother of the victim, [redacted]
who inquired about the status of the case. I explained to her that I was
told we would be going to the Grand Jury during the week of July 19,
2006. She stated she had not been contacted as of yet by the State
Attorney's Office for any information. I provided her with the
telephone numbers to the State Attorney's Office.

Investigation continues...

* * * * * * * * * * END OF REPORT * * * * * * * * * *
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I certify that the statements made by me on this form are true.

[Signature]

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CONFIDENTIAL

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David Roden

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I certify that the statements made by me on this form are true.

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Donald Redman
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Addendum 9-9-20: The above data is true to the best of my knowledge.

David D. Smith

Signature

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Amounts correct: 22

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Total Flight Hours: 269
Total Encounters: 81

David Holmes

CONFIDENTIAL DR_000028
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Peter Schlegel

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Total to Date: 18130.00

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Pith signed: [Signature]

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I certify that the statements made by me on this form are true.

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**TOTALS REPORTED TO**

I certify that the statements made by me on this form are true.

Plata's Signature: [Signature]

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**CONFIDENTIAL DR_000070**

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I certify that the statements made by me on this form are true.

[Signature]

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Total to Date 33132.7

*Certified that the entries made by me on this form are true.*

David Pedersen
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I certify that the statements made by me on this form are true.

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Amount Earned: 102.98

Total Incurred: 33165
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David Rodgers

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Amount Owing: $0
Total to Date: $0

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GUIFFER001169

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I certify that the statements made by me on this form are true.

Pilot's Signature: [Signature]

Page Total: [Signature]

Amount Awarded: [Signature]

Total to Date: [Signature]
EXHIBIT 42
(Filed Under Seal)
FBI
31E-MM-108062

Photos from
Virginia Roberts
EXHIBIT 43
(Filed Under Seal)
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TBL 923/1 CHK 2096
090CT 02 08:16AM

4 COFFEE/TEA/ MILK 220.00 T
FOOD TOTAL 220.00

VAT 7% 24.64
SERVICE 32.00
TOTAL DUE 376.64

923
923/ROBERTS
HOTEL GUEST 376.64
ACC RECEIVABLE 021009-02-00278
TIN 3 10 1 61770 2
RD# 5014 22 000233
---5 CHECK CLOSED 06:13AM---

---PAID---CHARGES---

NAME Virginia ROBERTS
ROOM NO. 923
ADDRESS

SIGNATURE

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HOTEL GUEST
ACC RECEIVABLE 021010-02-00310
TIN 3101617782
RD# 501422000222
---5 CHECK CLOSED 06.25AM---

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PAID-CHARGES

NAME:

ROOM NO.

C.C. NO.

ADDRESS:

SIGNATURE

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**TOTAL DUE**: 153.01

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HOTEL GUEST 153.01
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TIN 3101 6173 2
R# 5014 22 000232
--- 5 CHECK CLOSED 06:11AM ---

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**PAID - CHARGES**

**NAME**: [Signature]
**ROOM NO**: 123
**C. NO**: [Signature]

**ADDRESS**: [Signature]
**ROOM SERVICE**

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- TBL 1/69 CHK 129 QST 1
- 14.OCT.02 05:09AM

- 1 FRIED SPRING ROLL 120.00 T
- 1 F RICE PORK CHIC 130.00 T
- FOOD TOTAL 250.00
- VAT 7% 19.25
- SERVICE 25.00
- TOTAL DUE 294.25

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923
923/ROBERTS
HOTEL GUEST 294.25
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TIN 3 10 1 61770 2
RD# 5014 22 000232
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**PAID---CHARGES**

NAME: [Signature]
ROOM NO. 923
C.C. NO.
ADDRESS:

**SIGNATURE**

GIUFFRE007416
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TIN 31016 61770 2
R/N 5814 22 000202
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PAID-CHARGES

NAME:

ROOM NO.

ADDRESS:

C. C. NO.

SIGNATURE:

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- 283/ROBERTS
- HOTEL GUEST
- 282.48
- 021016-02-0597
- 3 10 1 61770 2
- 5014 22 000232
- CHECK CLOSED 06/29/AM

**Paid Charges**

- NAME: Virginia Roberts
- ROOM NO: 6-4083
- ADDRESS:
- SIGNATURE
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RDM 5014 22 0001232
--- CHECK CLOSED 08:00 AM ---
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NAME: [Signature]

ROOM NO. 923

ADDRESS: [Signature]

GIUFFRE007420

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<tr>
<td>170C '02</td>
</tr>
</tbody>
</table>

**AMOUNTS**

|  
| COFF/TEA MILK |
|  
| FOOD TOTAL    |
|  
| VAT %         |
|  
| SERVICE       |
|  
| TOTAL DUE     |

923/KOHERY
HOTEL GUEST

ACC RECEIVABLE 021017-02-00679
TIN 170177 2
RM 5014 22 00232
5 CHECK CLOSET 19:06AM

**PAID**

<table>
<thead>
<tr>
<th>CHARGES</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAME</td>
</tr>
<tr>
<td>ADDRESS</td>
</tr>
<tr>
<td>SIGNATURE</td>
</tr>
</tbody>
</table>

GIUFFRE007421
CONFIDENTIAL
**ROYAL PRINCESS**

**ROCHAMBO**

**ROOM SERVICE**

<table>
<thead>
<tr>
<th>WAITER NO.</th>
<th>PERSONS</th>
<th>TABLE NO.</th>
<th>CHECK NO.</th>
</tr>
</thead>
<tbody>
<tr>
<td>923/G7</td>
<td>10</td>
<td>923</td>
<td>32160</td>
</tr>
</tbody>
</table>

**DETAILS**

- ROOM 8/F
- TEL 923/71
- CHK 2160
- 17 OCT '92 07:47 AM

**AMOUNTS**

<table>
<thead>
<tr>
<th>Item</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 FRESH FRUIT</td>
<td>20.00</td>
</tr>
<tr>
<td>2 OR GR TO JUICE</td>
<td>150.00</td>
</tr>
<tr>
<td>V.A.T. 7%</td>
<td>26.02</td>
</tr>
<tr>
<td>SERVICE</td>
<td>26.30</td>
</tr>
<tr>
<td>TOTAL DUE</td>
<td>230.52</td>
</tr>
</tbody>
</table>

**Paid by: 923/RoBERTS**

**Note:**
- ACC RECEIVABLE 01/07/92-00679
- TIN 011 81770 2
- RNC 3014 79 00 2692
- CHECK CLOSED 08:10 AM

**NAME:** Virginia Roberts

**ROOM NO.:** 923

**C.C. NO.:**

**SIGNATURE:**

*Confidential*
**ROYAL PRINCESS**  
**Chiang Mai**

### Room Service

<table>
<thead>
<tr>
<th>Waiter No.</th>
<th>Persons</th>
<th>Table No.</th>
<th>Check No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>C69</td>
<td>4</td>
<td>923</td>
<td>32171</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Details</th>
<th>Amounts</th>
</tr>
</thead>
<tbody>
<tr>
<td>ROOM B</td>
<td></td>
</tr>
<tr>
<td>ROOM B</td>
<td></td>
</tr>
<tr>
<td>ROOM B</td>
<td></td>
</tr>
<tr>
<td>ROOM B</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Item</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cofee/Tea/ Milk</td>
<td>1,71</td>
</tr>
<tr>
<td>Food</td>
<td>22.25</td>
</tr>
<tr>
<td>VAT 7%</td>
<td></td>
</tr>
<tr>
<td>Service</td>
<td>25.00</td>
</tr>
<tr>
<td><strong>Total Due</strong></td>
<td>294.25</td>
</tr>
</tbody>
</table>

**Paid Charges**

- **Name:**
- **Room No.:** 403
- **Address:**
- **Signature:**

---

**GIUFFRE007423**  
**CONFIDENTIAL**
**ROYAL PRINCESS**

**ROOM SERVICE**

<table>
<thead>
<tr>
<th>WAITER NO.</th>
<th>PERSONS</th>
<th>TABLE NO.</th>
<th>CHECK NO.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>No. 123</td>
<td>No. 32172</td>
</tr>
</tbody>
</table>

**DETAILS**

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Food bill</td>
<td>188.32</td>
</tr>
<tr>
<td>VAT 7%</td>
<td>13.19</td>
</tr>
<tr>
<td>Service fee</td>
<td>18.32</td>
</tr>
</tbody>
</table>

**AMOUNTS**

- **Total Due**: 188.32

**PAID CHARGES**

- **Name**: [Signature]
- **Room No.**: G9
- **C.C. No.**: [Signature]
- **Address**: [Signature]

**GIUFFRE007424**

CONFIDENTIAL
<table>
<thead>
<tr>
<th>WAITER NO.</th>
<th>PERSONS</th>
<th>TABLE NO.</th>
<th>CHECK NO.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>G</td>
<td>No 263581</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>DETAILS</th>
<th>AMOUNTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>C.B.F.</td>
<td>208.91</td>
</tr>
<tr>
<td>FOOD TOTAL</td>
<td>314.55</td>
</tr>
<tr>
<td>VAT 7%</td>
<td>22.02</td>
</tr>
<tr>
<td>SERVICE</td>
<td>20.00</td>
</tr>
<tr>
<td>TOTAL DUE</td>
<td>363.53</td>
</tr>
</tbody>
</table>

4 OTE: GUEST 235.40

ROC RECEIVABLE 12/18/01-02-00755
TIN 3 19 1 61776 2

--- 1 CHECK CLOSET 10:30AM ---

PAID—CHARGES

<table>
<thead>
<tr>
<th>NAME</th>
<th>ROOM NO.</th>
<th>C.C. NO.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Daya Rangan</td>
<td>7 03</td>
<td></td>
</tr>
</tbody>
</table>

ADDRESS:

SIGNATURE: Daya Rangan

GIUFFRE007425
CONFIDENTIAL
<table>
<thead>
<tr>
<th>WAITER NO.</th>
<th>PERSONS</th>
<th>TABLE NO.</th>
<th>CHECK NO.</th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>23629</td>
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</tbody>
</table>

**Details**

<table>
<thead>
<tr>
<th>Items</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 SINGHA BEER -S</td>
<td>140.00</td>
</tr>
<tr>
<td>1 SOFT DRINKS</td>
<td>50.00</td>
</tr>
<tr>
<td>GEVR. TOTAL</td>
<td>190.00</td>
</tr>
<tr>
<td>VAT 7%</td>
<td>13.30</td>
</tr>
<tr>
<td>SERVICE</td>
<td>16.00</td>
</tr>
<tr>
<td>TOTAL DUE</td>
<td>139.32</td>
</tr>
</tbody>
</table>

**Payment Details**

- 907/BROWNIE-MCI
- HOTEL GUEST 138.32
- ACC RECEIVABLE 02-01-2017-04-06695
- TIN 310151702
- RDN 501422090232
- 12 CHECK CLOSED 12:14PM

**Paid Charges**

- NAME: McIntyre
- ROOM NO. 907
- C. C. NO.

**Signature**

M McIntyre
<table>
<thead>
<tr>
<th>Item</th>
<th>Quantity</th>
<th>Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Item 1</td>
<td>100</td>
<td></td>
<td>Description 1</td>
</tr>
<tr>
<td>Item 2</td>
<td>50</td>
<td></td>
<td>Description 2</td>
</tr>
<tr>
<td>Item 3</td>
<td>20</td>
<td></td>
<td>Description 3</td>
</tr>
</tbody>
</table>

**Laundry Expenses**

<table>
<thead>
<tr>
<th>Category</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wash</td>
<td>0.1</td>
</tr>
<tr>
<td>Dry</td>
<td>0.2</td>
</tr>
<tr>
<td>Fold</td>
<td>0.3</td>
</tr>
</tbody>
</table>

**Other Expenses**

<table>
<thead>
<tr>
<th>Category</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Repair</td>
<td>0.4</td>
</tr>
<tr>
<td>Cleaning</td>
<td>0.5</td>
</tr>
<tr>
<td>Maintenance</td>
<td>0.6</td>
</tr>
</tbody>
</table>

**Total**

<table>
<thead>
<tr>
<th>Category</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>1.4</td>
</tr>
</tbody>
</table>

**Notes:**

- Repair includes both labor and parts.
- Cleaning is based on a flat rate for each load.
- Maintenance is due to regular wear and tear.

**Generosity:**

The generosity of the donor is appreciated.
### MINI BAR LIST

**ROYAL PRINCESS**

**Mini Bar List**

**Beverages Available in Your Refrigerator**

<table>
<thead>
<tr>
<th>Bar Stock</th>
<th>Contents</th>
<th>Unit Price</th>
<th>Consumption</th>
<th>Total Bar</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Singha Beer (Small)</td>
<td>100</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Heineken Beer</td>
<td>110</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Soda Water</td>
<td>50</td>
<td>1</td>
<td>50</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Coca-Cola</td>
<td>50</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Mineral Water</td>
<td>60</td>
<td>2</td>
<td>120</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Brandy V.S.O.P. 20 cl.</td>
<td>550</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Scotch Whisky 20 cl.</td>
<td>400</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Thai Whisky</td>
<td>130</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Gin 20 cl.</td>
<td>400</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Vodka 20 cl.</td>
<td>400</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Chocolate Bar</td>
<td>60</td>
<td>1</td>
<td>120</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Potatoes Snack</td>
<td>40</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Singha Water</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Prices are inclusive of service charge and VAT

**Total**: 290

---

We refill your refrigerator daily, and bill the consumption directly to your hotel account. Drinks will be charged fully when the bottle is open.

**Please Do Not Pay Cash**

Guest's signature: ________________________________

Refilled by: ________________________________ Front Office Cashier
BEVERAGES AVAILABLE IN YOUR REFRIGERATOR

<table>
<thead>
<tr>
<th>NAME</th>
<th>ROOM NO.</th>
<th>DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>41678</td>
<td>9.7.16</td>
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</table>

**MINI BAR LIST**

<table>
<thead>
<tr>
<th>PAR</th>
<th>STOCK</th>
<th>CONTENT'S</th>
<th>UNIT PRICE</th>
<th>CONSUMPTION</th>
<th>TOTAL BAHT</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td></td>
<td>Singha Beer (Small)</td>
<td>100</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Heineken Beer</td>
<td>110</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Soda Water</td>
<td>50</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td></td>
<td>Coca-Cola</td>
<td>50</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Mineral Water</td>
<td>60</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td></td>
<td>Brandy V.S.O.P 20 cl.</td>
<td>550</td>
<td>1</td>
<td>550</td>
</tr>
<tr>
<td>1</td>
<td></td>
<td>Scotch Whisky 20 cl.</td>
<td>400</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td></td>
<td>Thai Whisky</td>
<td>130</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td></td>
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<td>400</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td></td>
<td>Vodka 20 cl.</td>
<td>400</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td>Chocolate Bar</td>
<td>60</td>
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<td>60</td>
</tr>
<tr>
<td>1</td>
<td></td>
<td>Potatoes Snack</td>
<td>40</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Singha Water</td>
<td>Complimentary</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Prices are inclusive of service charge and VAT

We refill your refrigerator daily and bill the consumption directly to your Hotel account. And drinks will be charged fully when the bottle is open.

**PLEASE DO NOT PAY CASH**

Guest's signature: ..........................................................

Refilled by: ............................................................... Front Office Cashier
### MINI BAR LIST

**BEVERAGES AVAILABLE IN YOUR REFRIGERATOR**

<table>
<thead>
<tr>
<th>NAME</th>
<th>CONTENTS</th>
<th>UNIT PRICE</th>
<th>CONSUMPTION</th>
<th>TOTAL BAHT</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Singha Beer (Small)</td>
<td>100</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Heineken Beer</td>
<td>110</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Soda Water</td>
<td>50</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Coca-Cola</td>
<td>50</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Mineral Water</td>
<td>60</td>
<td>1</td>
<td>60</td>
</tr>
<tr>
<td>1</td>
<td>Brandy V.S.O.P. 20 cl.</td>
<td>550</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Scotch Whisky 20 cl.</td>
<td>400</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Thai Whisky</td>
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<td></td>
</tr>
<tr>
<td>1</td>
<td>Gin 20 cl.</td>
<td>400</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Vodka 20 cl.</td>
<td>400</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Chocolate Bar</td>
<td>60</td>
<td>2</td>
<td>120</td>
</tr>
<tr>
<td>1</td>
<td>Potatoes Snack</td>
<td>40</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Singha Water</td>
<td>Complimentary</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Prices are inclusive of service charge and VAT

We refill your refrigerator daily and bill the consumption directly to your hotel account. And drinks will be charged fully when the bottle is open.

**PLEASE DO NOT PAY CASH**

Guest's signature: ____________________________

Refiled by: ____________________________ Front Office Cashier

**TOTAL 180**
## MINI BAR LIST

**ROYAL PRINCESS**

**NO. 41858**

**BEVERAGES AVAILABLE IN YOUR REFRIGERATOR**

<table>
<thead>
<tr>
<th>NAME</th>
<th>ROOM NO.</th>
<th>DATE</th>
</tr>
</thead>
<tbody>
<tr>
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</table>

<table>
<thead>
<tr>
<th>PARK STOCK</th>
<th>CONTENTS</th>
<th>UNIT PRICE</th>
<th>CONSUMPTION</th>
<th>TOTAL BAHT</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Singha Beer (Small)</td>
<td>100</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
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<td>110</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Soda Water</td>
<td>50</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Coca-Cola</td>
<td>50</td>
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<td></td>
</tr>
<tr>
<td>2</td>
<td>Mineral Water</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Brandy V.S.O.P. 20 cl.</td>
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<td></td>
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</tr>
<tr>
<td>1</td>
<td>Scotch Whisky 20 cl.</td>
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<td></td>
<td></td>
</tr>
<tr>
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<td>Thai Whisky</td>
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<td></td>
</tr>
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<td>Gin 20 cl.</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Vodka 20 cl.</td>
<td>400</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Chocolate Bar</td>
<td>60</td>
<td></td>
<td>120</td>
</tr>
<tr>
<td>1</td>
<td>Potatoes Snack</td>
<td>40</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Singha Water</td>
<td></td>
<td></td>
<td>Complimentary</td>
</tr>
</tbody>
</table>

**Prices are inclusive of service charge and VAT**

We refill your refrigerator daily and bill the consumption directly to your Hotel account. And drinks will be charged fully when the bottle is open.

**PLEASE DO NOT PAY CASH**

Guest's signature: .......................................................... Front Office Cashier

Refilled by: ...............................................................
## MINI BAR LIST

**BEVERAGES AVAILABLE IN YOUR REFRIGERATOR**

<table>
<thead>
<tr>
<th>NAME</th>
<th>CONTENTS</th>
<th>UNIT PRICE</th>
<th>CONSUMPTION</th>
<th>TOTAL BAHT</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Singha Beer (Small)</td>
<td>100</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Heineken Beer</td>
<td>110</td>
<td>1</td>
<td>110</td>
</tr>
<tr>
<td>2</td>
<td>Soda Water</td>
<td>50</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Coca-Cola</td>
<td>50</td>
<td>1</td>
<td>50</td>
</tr>
<tr>
<td>2</td>
<td>Mineral Water</td>
<td>60</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Brandy V.S.O.P. 20 cl.</td>
<td>550</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Scotch Whisky 20 cl.</td>
<td>400</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Thai Whisky</td>
<td>130</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Gin 20 cl.</td>
<td>400</td>
<td></td>
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</tr>
<tr>
<td>1</td>
<td>Vodka 20 cl.</td>
<td>400</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Chocolate Bar</td>
<td>60</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Potatoes Snack</td>
<td>40</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Singha Water</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Prices are inclusive of service charge and VAT

PLEASE DO NOT PAY CASH

Guest's signature: __________________________

Refilled by: __________________________

Front Office Cashier

Total: 160
EXHIBIT 44
(Filed Under Seal)
EXHIBIT 45
(Filed Under Seal)
<table>
<thead>
<tr>
<th>Vehicle Description</th>
<th>Number</th>
<th>Colour</th>
<th>Licence Number</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mercedes Benz 600</td>
<td>(661) 309-6415 Rear (661) 379-9390 Front</td>
<td>Black</td>
<td>EO9PRU</td>
<td>Mercedes Benz of Palm Beach 4000 Okeechobee Boulevard West Palm Beach, FL 33409 Attn: Shawn Adison Tel: (561) 689-6363</td>
</tr>
<tr>
<td>Mercedes Benz 600</td>
<td>(561) 758-1672 Rear (561) 818-8867 Front</td>
<td>Black</td>
<td>G14KCT</td>
<td>Paint Work &amp; Body Shop Roger Dean Chevrolet 2235 Okeechobee Boulevard West Palm Beach, FL 33409 Tel: (561) 683-8100</td>
</tr>
<tr>
<td>Mercedes Benz 600 Conv</td>
<td>(561) 346-7141</td>
<td>Silver</td>
<td>RAS85L</td>
<td></td>
</tr>
<tr>
<td>Suburban</td>
<td>(561) 371-1686</td>
<td>Black</td>
<td>WGE53R</td>
<td>Roger Dean Chevrolet 2235 Okeechobee Boulevard West Palm Beach, FL 33409 Tel: (561) 683-8100</td>
</tr>
<tr>
<td>Chrysler Mini Van</td>
<td>(561) 308-5700</td>
<td>White</td>
<td>WGE52R</td>
<td>Nestor Auto Repairs 2600 Florida Avenue West Palm Beach, FL 33401 Tel: (561) 835-0809</td>
</tr>
<tr>
<td>Cobra Grand</td>
<td></td>
<td>Green</td>
<td>C97CRJ</td>
<td>Nestor Auto Repairs 2600 Florida Avenue West Palm Beach, FL 33401 Tel: (561) 835-0809</td>
</tr>
<tr>
<td>Volvo</td>
<td>(561) 686-3707</td>
<td>Gold</td>
<td></td>
<td>Volvo Palm Beach 5544 Okeechobee Boulevard West Palm Beach, FL 33417 Tel: (561) 471-7600</td>
</tr>
<tr>
<td>Oil Well</td>
<td>900 Southern Boulevard West Palm Beach, FL 33405</td>
<td></td>
<td></td>
<td>Oil change every 3,000 miles</td>
</tr>
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</table>

Registration, insurance and yearly inspection papers to be kept in the glove compartment of each vehicle. Spare keys are kept in the key box in the office.

02/11/2015
<table>
<thead>
<tr>
<th>Store Name</th>
<th>Address</th>
<th>Phone Numbers</th>
</tr>
</thead>
</table>
| Muvico Parisian  | City Place
545 Hibiscus Street
West Palm Beach, FL 33401
Tel: (561) 833-0400 |                                        |
| **GROCERY STORES** |                                                   |                                        |
| Bishop Water Co  | Tel: (561) 582-1367                               | E-bottled water (large and small)      |
| Carmine Giardini's | 2401 PGA Boulevard, Suite 172
Palm Beach Gardens, FL 33410
Tel: (561) 775-0105
Fax: (561) 775-9233 | Fish, meat, gourmet foods                     |
| C'est Si Bon     | 280 Sunset Avenue
Palm Beach, FL 33480
Tel: (561) 659-6503 | Gourmet foods                                 |
| Publix Super Market | 265 Sunset Avenue
Palm Beach, FL 33480
Tel: (561) 655-4120 | General, cleaning, toiletries                 |
| Wild Oats        | 7736 South Dixie Highway
West Palm Beach, FL 33405
Tel: (561) 585-8800 | Health Foods                                  |
| **HEALTH & BEAUTY** |                                                   |                                        |
| Pharmacy         | Greens Pharmacy
151 North County Road
Palm Beach, FL 33480
Tel: (561) 832-4443 |                                        |
|                  | Lewis Pharmacy
235 South County Road
Palm Beach, FL 33480
Tel: (561) 655-7867 |                                        |
<table>
<thead>
<tr>
<th>Utilities</th>
<th>Details</th>
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</thead>
</table>
| Water      | City of West Palm Beach  
226 Cypress Lane  
Palm Springs, FL 33461  
Tel: (561) 965-5770  
Water shut-off for entire property is located next to the mailbox on the sidewalk. |
| Electricity| Florida Power and Light  
General Mailing Facility  
Miami, FL 33188-0001  
Tel: (561) 697-8000 |
| Gas        | Florida Gas Company  
401 South Dixie Highway  
West Palm Beach, FL 33401  
Tel: (561) 832-0672 |
| Sewer      | City of West Palm Beach  
226 Cypress Lane  
Palm Springs, FL 33461  
Tel: (561) 965-5770 |
| Trash Removal | City of West Palm Beach  
226 Cypress Lane  
Palm Springs, FL 33461  
Tel: (561) 965-5770  
Trash Removal (Daily Monday - Friday)  
Recycles (Thurs before 8am) |
| Telephone  | ETC  
2921 N Australian Avenue  
West Palm Beach, FL 33407  
Tel: (561) 881-8118 |
|            | Bell South  
Tel: (561) 780-2611 |
<table>
<thead>
<tr>
<th>Service</th>
<th>Details</th>
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<tbody>
<tr>
<td>Plumber</td>
<td><strong>General Plumbing</strong>&lt;br&gt;561-385-2591&lt;br&gt;Foster Plumbing&lt;br&gt;2800 Westgate Avenue&lt;br&gt;West Palm Beach, FL 33409&lt;br&gt;Tel: (561) 686-1721</td>
</tr>
<tr>
<td>Roto Rooter</td>
<td>Blocked drains&lt;br&gt;Roto Rooter&lt;br&gt;6600 NW 12th Avenue, Suite 213&lt;br&gt;Fort Lauderdale, FL 33309&lt;br&gt;Tel: (561) 832-1495</td>
</tr>
<tr>
<td>Pool</td>
<td>Hackl Pools&lt;br&gt;1331 Central Terrace&lt;br&gt;Lake Worth, FL 33460&lt;br&gt;Tel: (561) 588-7493</td>
</tr>
<tr>
<td>Tree Trimming</td>
<td>County Wide Tree Service&lt;br&gt;Tel: (561) 371-5786</td>
</tr>
<tr>
<td><strong>STORAGE</strong></td>
<td></td>
</tr>
<tr>
<td>Storage USA</td>
<td>Storage USA&lt;br&gt;5580 Okeechobee Boulevard&lt;br&gt;West Palm Beach, FL 33417&lt;br&gt;Tel: (561) 683-9955</td>
</tr>
<tr>
<td><strong>VEHICLES</strong></td>
<td></td>
</tr>
<tr>
<td>Car Detailing</td>
<td>Palm Beach Wash &amp; Auto Detail&lt;br&gt;1220 N. Dixie Highway&lt;br&gt;(at Amoco Gas)&lt;br&gt;Tel: (561) 835-8748</td>
</tr>
<tr>
<td>G.G.</td>
<td>724 SW 1st Ave&lt;br&gt;Boynton Beach, FL 33426</td>
</tr>
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</table>
## MAIL & DELIVERY SERVICES

<table>
<thead>
<tr>
<th>Service</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>FedEx</td>
<td>Tel: 1-800-463-3339, Account No: [redacted], Drop-off box next to Palm Beach National Bank on Worth Avenue</td>
</tr>
<tr>
<td>Post Office</td>
<td>401 South County Road, West Palm Beach, FL, Tel: (561) 832-0697</td>
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</table>

## MAINTENANCE

<table>
<thead>
<tr>
<th>Service</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Conditioning</td>
<td>Cassidy Air Conditioning, 501 Fern Street, West Palm Beach, FL 33401, Tel: (561) 833-6331</td>
</tr>
<tr>
<td>Awnings</td>
<td>American Awning Company, 537 Pine Terrace, West Palm Beach, FL 33405, Tel: (561) 832-7123</td>
</tr>
<tr>
<td>Cable Service</td>
<td>Adelphia Cable, 1401 North Point Parkway, West Palm Beach, FL 33407, Tel: (561) 478-8300</td>
</tr>
<tr>
<td>Carpenter</td>
<td>Tel: [redacted], Envin Ray</td>
</tr>
<tr>
<td>Carpet Cleaners</td>
<td>Stanley Steamers, Tel: (561) 586-5700, Merry Rugs, Tel: (561) 588-8588</td>
</tr>
<tr>
<td>Computers</td>
<td>[X] Bloomberg, 499 Park Avenue, New York, NY 10022, Tel: (212) 318-2100, Palm Beach consultants: Chad Bonta, Peter Kapcopoulos, Tel: [redacted]</td>
</tr>
</tbody>
</table>
# TRAVEL

<table>
<thead>
<tr>
<th>Pilots</th>
<th>Larry Visoski</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Dave Rodgers</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Larry Morrison</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mr Epstein's planes</th>
<th>Jet Aviation</th>
<th>(561) 233-7241</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Procedure for leaving cars at the airport: Leave car at Jet Aviation landing strip Leave the keys in the car Advise Jet Aviation Tail #909JE or Tail #908JE</td>
<td>They will tag and pull car to plane upon arrival</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ms Maxwell's plane</th>
<th>Raytheon</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Changed to</td>
</tr>
<tr>
<td></td>
<td>Fly Options</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Commercial Airlines</th>
<th>Air France</th>
<th>1-800-237-2747</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>American</td>
<td>1-800-433-7300</td>
</tr>
<tr>
<td></td>
<td>British Airways</td>
<td>1-800-247-9297</td>
</tr>
<tr>
<td></td>
<td>Continental</td>
<td>1-800-525-0260</td>
</tr>
<tr>
<td></td>
<td>Delta</td>
<td>1-800-221-1212</td>
</tr>
<tr>
<td></td>
<td>South African Airways</td>
<td>1-800-722-9675</td>
</tr>
<tr>
<td></td>
<td>United</td>
<td>1-800-241-6522</td>
</tr>
<tr>
<td></td>
<td>US Air</td>
<td>1-800-426-4322</td>
</tr>
</tbody>
</table>

---

Carlos Gilz Handyman (561)
### Banking

| Household Banking Account | Palm Beach National Bank  
| 125 Worth Avenue  
| Palm Beach, FL 33480 | Account No: [Redacted]  
Send to Eric Gany for reconciliation  
$1,000 Petty Cash Float |
| Tel: (561) 653-5594 |

### Bicycles

| Bicycles | Palm Beach Bicycle Trail Shop  
| 225 Sunrise Avenue  
| Palm Beach, FL 33480 | Mongoose Crossway 450  
Raleigh Aluminium 300  
Mercedes Benz  
Cignal Sports Bike  
Schwinn World  
Huffy Santa Fe  
Raleigh Sport  
Scott Boston |
| Tel: (561) 659-4583 |

### Bookstores

| Newspapers | Publix Super Market  
| 265 Sunset Avenue  
| Palm Beach, FL 33480 | Tel: (561) 655-4120 |
| Magazines | Main Street News  
| 255 Royal Poinciana Way  
| Palm Beach, FL 33480 | Tel: (561) 833-4027 |

### Cleaning Service

| Francis Peadon  
| House Cleaning Services | Every Tuesday and Wednesday  
8:00am - 4:00pm  
(Francis and Pastora Peadon) |

### Entertainment

| The Breakers | One South County Road  
| Palm Beach, FL 33480 | Renew car park stickers every September |
| Tel: (561) 655-6611 |
| Comedy Corner | 2000 South Dixie Highway  
| West Palm Beach, FL 33401 | Tel: (561) 833-1812 |
| The Mar-a-Lago Club | 1100 South Ocean Boulevard  
<p>| Palm Beach, FL 33480 | Tel: (561) 832-2600 |</p>
<table>
<thead>
<tr>
<th>Service</th>
<th>Contact Information</th>
<th>Notes</th>
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</thead>
<tbody>
<tr>
<td>Electrician</td>
<td>Energy Efficient Electric Tel: (561) 655-7211</td>
<td>Changed</td>
</tr>
<tr>
<td>Exterminator</td>
<td>Palm Beach Exterminating Tel: (561) 689-0808 Contact is Ken First Monday of every month at 10.30am Also use for termite tent</td>
<td></td>
</tr>
<tr>
<td>Garden Service</td>
<td>Alan Stopak Trace Wellington, FL 33414</td>
<td>Jerome Pierre Part-time help. Billed through Alan Stopak. In residence: Daily from 6.30am Not in residence: Mon - Fri from 2pm - 5pm Also maintains Mrs Epstein's property on Saturday mornings.</td>
</tr>
<tr>
<td>Garage Doors</td>
<td>The Doorsmith 4160 NW First Avenue Boca Raton, FL 33431 Tel: (561) 391-7768</td>
<td></td>
</tr>
<tr>
<td>Gates</td>
<td>Reich Metal Fabricators Tel: (561) 585-3173 Back door gate switch - above garage door controls. When open, round red light is on. Front door gate switch - in telephone outlet above the kitchen telephone</td>
<td></td>
</tr>
<tr>
<td>Irrigation</td>
<td>Dolphin Sprinkler Inc Tel: (561) 844-8082</td>
<td>Alan Bentz</td>
</tr>
<tr>
<td>Landscape Spraying</td>
<td>Academy Services Tel: (561) 478-4629</td>
<td>Arrange through Alan Stopak</td>
</tr>
<tr>
<td>Locksmith</td>
<td>Wilson Rowan Locksmiths 625 South Dixie Highway West Palm Beach, FL 33401 Tel: (561) 655-3637</td>
<td></td>
</tr>
<tr>
<td>Painter</td>
<td>Bill</td>
<td>Changed</td>
</tr>
</tbody>
</table>

02/11/2015
Address / Telephone Sheet

# 358 El Brillo Way, Palm Beach Fl, 33480

Name

Telephone/Fax

Mr. Jeffrey Epstein (NYSG LLC) Office
457, Madison Avenue 4th Floor
New York, NY 10021.

Ms. Ghislaine Maxwell

Email

Accountants

Eric Gany

EMAD HANNA (St Rep)

Bella Klein-Accountant

(Petty Cash Rep)

Email

Assistants

Leslie Groff (JE Sec)

Cecilia

Helan Kim

Michelle Compost-

Jenn Doyle

Property

Keith Blumberg

Email

Engineer

Richard Barnett

DOUG SCHOTTELE

Computers

Mark Lumberg

Architect

(212) 490 0000

(212) 717 4672

Residences of Mr. Jeffrey Epstein
9 East 71st Street,
New York NY 10021

Mr. Jeffrey Epstein

Ms. Ghislaine Maxwell

Staff

House Manager Jojo

House Manger Lynn

Staff Phone

Chef Brent Tindall
# Palm Beach Contractors

### General Plumbing
- **Customer Service representative**
  - Amy
  - **Telephone**: 561 585 2591

### Electrical
- **Reel Power Inc**
  - **Telephone**: 561 706 0827

### Gates
- **Samco Systems**
  - **Telephone**: 561 719 4832
  - **Owner**: Sam

  **Service gate switch**: above garage door controls, when round light is on.
  **Front gate switch**: just above the telephone outlet kitchen area.

### Garage doors
- **The Door Smith Inc**
  - **Telephone**: 561 780 2355
  - **Contact**: Keith Kelly

### Telephones
- **Southern Bell (repairs)**
  - **Telephone**: 561 881 8118

### Internal Phone system (NEC)
- **Repair and Programming**
  - **Telephone**: 561 881 8118

### Alarm System
- **Benham Industries Inc**
  - **Telephone**: 854 491 4112
  - **Contact**: Keith

### Locksmith
- **Wilson & Rowan**
  - **Telephone**: 561 655 3637

### A/C Maintenance
- **John C Cassidy**
  - **Telephone**: 844 480 8082
  - **24 hr service**

### Handyman
- **Carlos (carpenter)**

### Landscape
- **Alan Stoprock**

### Pest Control
- **Palm Beach Exterminator**
  - **Telephone**: 561 844 4808
  - **Contact**: Kim

### Irrigation
- **Dolphin Sprinkle**
  - **Telephone**: 561 478 4696

### Pool Heating
- **National Pool Service**
  - **Telephone**: 561 585 8866
  - **When needed**

### Pool Maintenance
- **Hawk Pool Service**
  - **Telephone**: 561 588 7493
  - **Monday/ Thursday**

### Tree Trimming
- **Country Wide Trees**
  - **Telephone**: 561 371 5786
  - **Twice, summer/winter**

### Carpet Cleaners
- **Stanley Steamers**
  - **Telephone**: 561 585 5700
  - **Wall to wall**
- **Merry Rug**
  - **Telephone**: 561 588 8588
  - **Area rug**

---

02/11/2015  Page 2306  Public Records Request No.: 18-268
**POST OFFICE**

**Cable**
- Adelphia cable
- Cable TV 561 468 8300

**Bottled Water**
- Bishop water company
- Avion water 561 582 1367

**Upholsterer**
- Frank Jenna

**Gas**
- Gas Energy Inc (Joe Di Giovanni) all gas repairs 561 963 0505

**Laundry equipment**
- May Tag 1800 622 4729

**Painter**
- Sam

**Storage**
- Storage USA
- 5580, Okeechobee Blvd
- Unit 6218
- Contact Lenny 561 683 5835

**Grocery & General Household items**

**General Grocery**
- Publix
- 265, Sunset Ave
- 561 655 4120

**Gourmet food**
- C' est si bon
- 289, Sunset Blvd
- 561 659 6503

**Carmine's**
- 2401 PGA Blvd
- Take 95 North to PGA Blvd
- 561 775 9233

**Green Pharmacy**
- 151, N County Road
- 561 832 4443

**Flowers**
- Extra touch Flowers 561 835 8000

**Hardware**
- Home Depot
- 561 832 0783

**Sewell Hardware**
- 561 832 7171

**Newspapers**
- Main Street News
- 561 833 4027

**Post Office**
- 401, South County Road
- 561 832 0697

**Car Detailing**
- George

**Taxi Service/Limo**
- Dan Tischen

**FedEx**
- # 114420816 (Monday & Thursday)
- 1800 463 3339

**Recycling**
- Every Thursday 6AM to 5PM

**Trash collection**
- M-F once a day Early Morning

**Cars**
- Mercedes of Palm Beach 561 689 6393
- Chevrolet 561 683 8100
- Auto Repairs
  - Gray Sunoco 340 South County
  - 561 655 6645
  - Nestor Auto 2600, Florida Avenue
  - 561 835 0809

**Gasoline**
- Gray Sunoco

**All American Shutters**
- 561 712 9882

02/11/2015

Page 2307
Public Records Request No.: 18-268
* INTEL *

From Sgt Dan Szarzewski

 Electropeper

Could talk w/ Epstein knows them well. Info passed on to Capt.
12:50 PM - wants to talk to you at something private.

Friday 6/19 7:15 PM

6/17 5:55 AM

12:30 has a Q for you. Can you please call her.

6/19 10:20 AM Jean Luc

Signed Neiman Marcus 6/19/05 $33.02 Amex

[Redacted] will be here e 6:30 pm

6/19/05 1:00 AM Jean Luc

Four Seasons [Redacted] watt

6/18/05 6:40

914

6/19/05

TonyAworld.com

[Redacted]

Trans.
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).
ITEMIZED STATEMENT OF EARNINGS

FROM: SOCIAL SECURITY ADMINISTRATION
OFFICE OF CENTRAL OPERATIONS
6100 WABASH AVENUE
BALTIMORE MARYLAND 21215

NUMBER HOLDER NAME: VIRGINIA GIUFFRE

BOIES SCHILLER AND FLEXNER
401 E LAS OLAS BLVD STE 1200
FORT LAUDERDALE FL 33301

<table>
<thead>
<tr>
<th>EMPLOYER NUMBER:</th>
<th>KFC USA INC</th>
</tr>
</thead>
<tbody>
<tr>
<td>% PAYROLL DEPT</td>
<td>5200 COMMERCE CROSSING DR</td>
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<tr>
<td>LOUISVILLE KY 40229-2182</td>
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<table>
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<tr>
<th>YEAR</th>
<th>1ST QTR</th>
<th>2ND QTR</th>
<th>3RD QTR</th>
<th>4TH QTR</th>
<th>TOTAL</th>
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<tr>
<td>1999</td>
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<td></td>
<td></td>
<td>$140.70</td>
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<tr>
<th>EMPLOYER NUMBER:</th>
<th>PUBLIX SUPER MARKETS INC</th>
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<tbody>
<tr>
<td>PO BOX 32018</td>
<td>LAKELAND FL 33802-2018</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>YEAR</th>
<th>1ST QTR</th>
<th>2ND QTR</th>
<th>3RD QTR</th>
<th>4TH QTR</th>
<th>TOTAL</th>
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<td>$216.69</td>
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<tr>
<th>EMPLOYER NUMBER:</th>
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<tr>
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### Itemized Statement of Earnings

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EXHIBIT 47
(Filed Under Seal)
## QuickReport by Description

8/12/69 through 1/29/03

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Total 8/12/69 - 1/29/03

Total Inflows
Total Outflows

Net Total
EXHIBIT 48
(Filed Under Seal)
Case 18-2868, Document 283, 08/09/2019, 2628241, Page 862 of 883

--- Forwarded message ---
From: <ross@acuityreputation.com>
Date: 2 January 2015 at 20:29
Subject: Re: URGENT - this is the statement
To: G Max <gmax1@ellmax.com>
Cc: Philip Barden <philip.barden@devonshires.co.uk>

OK G going with this, thanks Philip.
Sent from my BlackBerry® wireless device

---

From: [Redacted]
Date: Fri, 2 Jan 2015 20:14:53 +0000
To: Ross Gow <ross@acuityreputation.com>
Cc: Philip Barden <philip.barden@devonshires.co.uk>
Subject: FW: URGENT - this is the statement

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 Derschitz 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.
EXHIBIT 49
(Filed Under Seal)
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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
EXHIBIT 50
(Filed Under Seal)
EXHIBIT 12
UNITED STATES DISTRICT COURT
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 JOINER 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

¹As 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. 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

2
As with Jane Doe #1 and Jane Doe #2, Jane Doe #3 was repeatedly sexually abused by Epstein.
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 Doc #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 JOINER

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.

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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Attorneys for Jane Doe #1 and Jane Doe #2
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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/s/ Bradley J. Edwards
EXHIBIT 51
(Filed Under Seal)
## Selected docket entries for case 18−2868

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

--------------------------------------------------

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

--------------------------------------------------

DEFENDANT’S REPLY TO PLAINTIFF’S STATEMENT OF
CONTESTED FACTS AND PLAINTIFF’S “UNDISPUTED FACTS”
Pursuant to Local Civil Rule 56.1

Laura A. Menninger
Jeffrey S. Pagliuca
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303.831.7364
Pursuant to Rule 56.1 of the Local Civil Rules of this Court, defendant Ghislaine Maxwell submits this Reply to Plaintiff’s Statement of Contested Facts and Plaintiff’s Undisputed Facts (“Response”), Doc. 586-1.

INTRODUCTION


First, Plaintiff largely failed to provide any “citation to evidence which would be admissible” to challenge Defendant’s Statement of Material Undisputed Facts and therefore Ms. Maxwell’s undisputed facts should be deemed admitted.

Second, rather than set forth “additional material facts as to which it is contended that there exists a genuine issue to be tried” (Local Civil Rule 56.1(b)), Plaintiff instead set forth her own purportedly “undisputed facts.” Because Plaintiff did not cross-move for summary judgment, her supposedly “undisputed facts” are not permitted by the Rules and should be stricken.

I. Ms. Maxwell’s reply in support of statement of undisputed facts.

1. Undisputed Fact 1: 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. Exs. A and B.

   a. Reply: Plaintiff cites no admissible evidence to contest these undisputed facts. McCawley Ex.34 (GIUFFRE368) is an email from Sharon Churcher to Plaintiff. It is Ms. Churcher’s hearsay and therefore inadmissible. In any event, it does not speak to the
contents of Plaintiff’s interviews with Churcher. McCawley Decl. Ex. 31 is an FBI
interview, also inadmissible hearsay, which again does not describe Plaintiff’s interviews
in news articles. In the absence of contrary evidence, Undisputed Fact 1 should be
deemed admitted.

2. **Undisputed Fact 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.” Exs. A-B at 5.

   a. **Reply:** Plaintiff does not contest these facts and they therefore should be
deemed admitted.

3. **Undisputed Fact 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.” Ex.C.

   a. **Reply:** Plaintiff “denies” that Mr. Barden “issued a statement,” but offers no
admissible evidence to refute this point. Further, she acknowledges that the Statement
was issued “By Devonshires Solicitors,” Mr. Barden’s law firm.

4. **Undisputed Fact 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

Ex. C.

a. **Reply:** Plaintiff does dispute the contents of the 2011 statement and therefore it should be deemed admitted.

5. **Undisputed Fact 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. Ex.D, at 2.

a. **Reply:** Plaintiff “stipulates” to the facts contained in paragraph 5 and therefore they should be deemed admitted.

6. **Undisputed Fact 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. Ex.D at 1, 9.

a. **Reply:** Plaintiff “agreed” to this paragraph.
7. **Undisputed Fact 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. Ex.E, at 5.

a. **Reply:** Plaintiff does not dispute that Judge Marra made the findings detailed in Undisputed Fact 7. Further, she admits that the Government refused to stipulate that she “had been sexually abused by Jeffrey Epstein and his co-conspirators (including co-conspirator Alan Dershowitz), which would make her a ‘victim’ of a broad sex trafficking conspiracy.” Although she now submits there were other reasons for inclusion of such lurid details, those reasons were rejected by Judge Marra. As she does not offer any admissible evidence to contradict the findings made by Judge Marra, this “fact,” specifically Judge Marra’s findings, should be deemed admitted. In any event, we request under Fed. R. Evid. 201(c)(2) that the Court take judicial notice of the contents of Judge Marra’s ruling and order.

8. **Undisputed Fact 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. Ex.D, at 1 & n.1.
a. **Reply**: Plaintiff offers no admissible evidence to refute these facts and they therefore should be deemed admitted. Specifically, she does not offer any evidence to dispute that she knew the media had been following Epstein and the CVRA action, nor does she dispute that her attorneys made no attempt to file the motion under seal, rather filing it publicly. The facts are thus admitted.

9. **Undisputed Fact 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. Ex.E at 5-7.

a. **Reply**: Plaintiff offers no admissible evidence to refute these facts and they therefore should be deemed admitted. See Reply to Undisputed Fact 7, *supra*. In any event, we request under Fed. R. Evid. 201(c)(2) that the Court take judicial notice of the contents of Judge Marra’s ruling and order.

10. **Undisputed Fact 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. *Id.* at 7-10.

a. **Reply:** Plaintiff offers no admissible evidence to refute these facts and they therefore should be deemed admitted. *See* Reply to Undisputed Fact 7, *supra*.

11. **Undisputed Fact 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.”

Id. at 3-6.

a. **Reply:** Plaintiff offers no admissible evidence to refute the facts actually stated in the paragraph, i.e., that the “lurid” details (as coined by Judge Marra) were included in her CVRA Joinder Motion. Plaintiff claims to offer “admissible evidence” to “corroborate the statements [she] made in the joinder motion.” Setting aside for the moment that most of the cited documents are inadmissible hearsay, as addressed later, such evidence should be disregarded because none of the offered documents speak to fact that these “lurid” details were actually included in the joinder motion, as a simple reading of Ex.D reveals. Because Plaintiff does not refute that point, the fact that the details were in the Joinder Motion should be deemed admitted. In any event, we request under Fed. R. Evid. 201(c)(2) that the Court take judicial notice of the contents of plaintiff’s CVRA joinder motion.

12. **Undisputed Fact 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.
a. **Reply:** Again, Plaintiff offers no evidence that these “lurid details” were included in the Joinder Motion, as indeed they were, and thus the fact that they were should be deemed admitted.

13. **Undisputed Fact 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

   a. **Reply:** Plaintiff does not dispute that she made this statement in her joinder motion and it is admitted.

14. **Undisputed Fact 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.” 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.

   a. **Reply:** Plaintiff does not contest the quoted contents of the joinder motion, but rather offers argument regarding Plaintiff’s purported “belief.” Plaintiff did not submit an affidavit attesting to such “belief” and therefore no admissible evidence was cited or offered. The facts should therefore be deemed admitted.

15. **Undisputed Fact 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. *Id.* at 7-8.

   a. **Reply:** Plaintiff states the facts are “untrue” but offers no admissible evidence to support that statement. She has no affidavit or other statement from “the other ‘Jane
Doe’ (who was represented by Plaintiff’s counsel, and therefore had the ability to furnish such an affidavit). Indeed, Plaintiff acknowledges that the “other Jane Doe” “does not know Ms. Giuffre.” These facts must be deemed admitted. [REDACTED], who is NOT the other Jane Doe, is irrelevant to the undisputed fact asserted. She also offers no corroboration of the ‘same pattern of abuse,’ and in fact does not “remember” any such facts, as already briefed. See Doc. 567 at 12-14.

16. **Undisputed Fact 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. Exs. A-B.

   a. **Reply:** Plaintiff’s protestation aside, the Churcher articles (attached to Ms. Churcher’s sworn affidavit filed in this case at Doc. 216 and 216-1 through 216-8) fail to include the vast majority of details included in Plaintiff’s CVRA joinder motion, as any side-by-side comparison will reveal. Plaintiff’s simple facile response is that she “did reveal details in 2011 consistent with those in the joinder motion.” She offers no admissible evidence of these details she “revealed” to Ms. Churcher, instead citing to a heavily redacted interview she purportedly gave to the FBI, not Ms. Churcher. The purported FBI report is itself hearsay, not to mention, redacted and prepared years after any supposed interview of Plaintiff. McCawley Decl. Ex.31. Because Plaintiff offers no admissible evidence to contradict the discrepancies between the Churcher articles and the joinder motion, these facts should be deemed admitted.

17. **Undisputed Fact 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

a. **Reply:** Plaintiff cites no contrary evidence and therefore the facts should be deemed admitted.

18. **Undisputed Fact 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.” Ex.F; Ex.G, at 33:8-23. The email was sent to more than 6 and probably less than 30 media representatives. *See* Ex.G, at 33:8-34:3. It was not sent to non-media representatives. *See id.* at 31:2-35:21.

a. **Reply:** Plaintiff disputes as “blatant falsehood,” without admissible evidence, that it was Mr. Barden who directed that the January 2 email be sent to media organizations. She then goes on to quote the very section of Mr. Gow’s deposition in which he surmises (but does not know, indicated by his statement it was his “understanding”) that it was something that had been sent to Maxwell by Barden. Indeed, Mr. Barden clears up this confusion in his Declaration, in which he unequivocally swore,

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.
Ex.K ¶ 10. Mr. Gow’s surmise as to how the statement was “forwarded to him” and by whom does not controvert the sworn testimony of Mr. Barden himself. Again, without admissible evidence to the contrary, the facts must be deemed admitted.

With regard to the number of media representatives to whom he sent the email, Mr. Gow testified it was between 6 and 30. Ex.G at 33-34. His further testimony, offered by Plaintiff, that he spoke to “over 30 journalists” does not contradict that statement. Nowhere does Plaintiff offer testimony that he read the statement to over 30 journalists. Instead, Mr. Gow acknowledged it was “very possible” that he had ever read[] the statement to press or media over the phone,” not that he read it to “over 30 journalists.” Plaintiff’s selective cutting and pasting undercuts her so called evidence that the facts in Paragraph 18 are “false,” and thus they ought be deemed admissible.

19. Undisputed Fact 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. See, e.g., Ex.G, at 30:23-35:21 & Depo.Ex.3.

a. Reply: While Plaintiff decries the second sentence as “false,” her cited evidence contradicts her conclusion. Mr. Gow testified that “any time there was an incoming query it was either dealt with on the telephone by referring them back to the two statements…or someone would email them the statement. So no one was left unanswered.” McCawley Decl., Ex.6 at 67. As his testimony makes clear, Mr. Gow sent
the statement to those journalists who made inquiry; he did not sent it to anyone who did not. Based on the admissible evidence, this fact remains undisputed.

20. **Undisputed Fact 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.

Ex.F.

a. **Reply:** Plaintiff does not dispute the contents of the email and therefore it should be deemed admitted.

21. **Undisputed Fact 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. Ex.K ¶¶ 10,15.
a. **Reply:** Plaintiff makes two responses. As to the first sentence, she asserts without evidentiary support that “the Court should not consider” the Barden Declaration. This argument is frivolous for the reasons given on pages 8, 11-12, 18-19 of the Reply Brief in Support of Motion for Summary Judgment. It is a Declaration provided by an attorney with knowledge of the facts, Mr. Barden, disclosed by Defendant in her Rule 26 witnesses, whom Plaintiff chose not to depose. As to the second sentence, Plaintiff offers two pieces of evidence which she argues dispute the facts in question; they do not. That Mr. Gow forwarded the statement, prepared by Mr. Barden, to the media is not disputed. Rather, as Mr. Barden asserted in his declaration, and Plaintiff failed to cite contradictory evidence, he was the one who prepared the vast majority of the statement and instructed Mr. Gow to transmit it via email to members of the British media. Ex.K ¶¶ 10. He likewise avers that he “did not intend the January 2015 statement as a traditional press release solely to disseminate information to the media [and] this is why I intentionally did not request that Mr. Gow or any other public relations specialist prepare or participate in preparing the statement.” *Id.* at ¶ 15. Plaintiff fails to contradict Mr. Barden’s sworn statement.

22. **Undisputed Fact 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.” *Id.* ¶ 11.
a. **Reply:** This paragraph, eliciting Mr. Barden’s intent, is uncontroverted by Plaintiff. She fails to cite any contradictory admissible evidence, instead making legal arguments. Her arguments are not admissible evidence (e.g., “it is her statement and she directed that it be sent to the media and public,” lacks any citation to record evidence). Plaintiff’s list of evidence she contends “corroborates” Plaintiff’s claims should be ignored as they do not pertain to Mr. Barden’s purposes in drafting the January 2 statement.

23. **Undisputed Fact 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.

a. **Reply:** Again, Plaintiff “disputes” Mr. Barden’s intent without citation to record evidence. Plaintiff claims that Barden did not “note” anything in the statement, but the statement itself contains the phrase: “Ms. Roberts claims are obvious lies and should be treated as such and not publicized as news, *as they are defamatory.*” Plaintiff’s unsupported arguments should be ignored and these facts pertaining to Mr. Barden’s intent deemed admitted.

24. **Undisputed Fact 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.* ¶ 18. The purpose of the prefatory statement was to inform the media-recipients of this intent. *Id.*

a. **Reply:** Plaintiff again “disputes” any statement related to Mr. Barden’s purpose or intent, but offers no evidence contradicting his purpose or intent. She simply points out that Ms. Maxwell retained Mr. Gow in early 2015, and that he works for a public relations firm, which is non-responsive to the fact at issue, i.e., Mr. Barden’s intent with respect to language included in the statement. No one has contested that it was Mr. Gow who actually forwarded the statement to select members of the media who had requested a response. The fact set forth should be deemed admitted.

25. **Undisputed Fact 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.

a. **Reply:** Plaintiff offers no evidence to dispute the facts cited and so they should be deemed admitted.

26. **Undisputed Fact 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 (Complaint), ¶¶ 24-25.

a. **Reply:** Plaintiff does not dispute this statement.

27. **Undisputed Fact 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.” *Id.*

a. **Reply:** Plaintiff “agrees.”

28. **Undisputed Fact 28:** Plaintiff repeatedly has sought out media organizations to discuss her alleged experience as a victim of sexual abuse. This Reply Statement at ¶¶ 51-54 (citing *inter alia* Doc. 216 ¶¶ 2-11 and referenced exhibits, Doc. 261-1 to 216-8; Exs. N, KK, LL, MM).

a. **Reply:** Plaintiff “denies” this contention, points to an email from Sharon Churcher seeking to interview her, and asserts that it was the media that sought her out. The weight of evidence, cited by Defendant at paragraphs 51-54, in addition to Plaintiff’s own documents, belie this assertion. She through her attorneys sought out a videotaped interview with ABC News, she sent her “book manuscript” to publishers and literary agents, and expressed anticipation and frustration that her “exclusive contract” with The Mail prevented her for a period of time from marketing her book. *See, e.g.*, EXHIBIT QQ at GIUFFRE003959.

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**Email:**

To: sharon.churcher[sharon.churcher@mailonsunday.co.uk]
From: Virginia Garfie
Sent: Fri 5/20/2011 2:20:09 AM
Importance: Normal
Subject: How ya doing??

Received: Fri 5/20/2011 2:20:09 AM

Hi Buddy,
I hope you are stopping to smell the daffodils once in a while and having a good day!! I am so excited today because I ca go sign with an agent as my contract is finished with “Mail On Sunday” ...YEAH!!! Sandra and I have been working really hard to get me ready for my trip to the US in a few weeks and I was wondering if I could use your advice again. She has got an INTL agent who is interested in speaking with me and I don’t want to say “Yes” to the first bite because I’m not su what to look for in an agent. What could you recommend that I do? I will send Jarred and Irene (your recommended agent) a copy of the synopsis and sample chapters but how do I choose the right one for “The Story”? Do you know anyone else that might be interested in this as well? If so, i am keen on speaking with anyone who might be. I am sooooooooo excited about this and will keep you updated with the progressing events. When l am in New York we have to meet up for some city shopping and take the kids to Central Park to see the Zoo, given there will be no masturbaining kangaroo’s for you to make friends with, but who knows? I am looking forward to showing Robbie around and he’s got some family out there so well we have to catch up with. Such busy times, but I’m loving it!! Anyways I hope your taking care and catch me up on your fun times!!

Take care,
Jenna
Plaintiff has disputed none of these activities she freely engaged in for years, and thus these facts should be deemed admitted.

29. **Undisputed Fact 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.” Ex.J ¶ 24; Ex.K ¶¶ 2-3.

   a. **Reply:** Plaintiff argues that her “lurid details” were necessary legally. Judge Marra, however, has already held that they were not and her legal arguments, unsupported by any actual evidence in this case, cannot serve to controvert his findings as quoted.

30. **Undisputed Fact 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.” Ex.D, at 1, 6-7, 10 (emphasis supplied).

   a. **Reply:** Plaintiff fails to offer any evidence to controvert the contents of her CVRA Joinder Motion and thus, the fact should be deemed admitted.

31. **Undisputed Fact 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.” Ex.KK.
32. **Undisputed Fact 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. Ex.H, at 7-8; Ex.I, at 4.

   a. **Reply:** Her argument aside, Plaintiff offers no admissible evidence to controvert the interrogatory request and her response, which was limited to “nine instances” in which the press published “portions of the January 2015 statement.” For example, Plaintiff does not point to a single news story that published the entirety of the January 2015 statement. In the absence of contrary evidence, the fact should be deemed admitted.

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

   a. **Reply:** Plaintiff does not and cannot point to any of the nine publications she disclosed, or any other publication, that published the entire January 2015 statement, and this fact thus must be deemed admitted.

34. **Undisputed Fact 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. Ex.J ¶ 24; Ex.K ¶¶ 2-3.

a. **Reply:** Plaintiff’s proffered evidence, testimony from Mr. Gow, fails to support her argument and fails to controvert the Barden Declaration as cited by the defendant. Nothing in the testimony establishes, as Plaintiff argues, that “Defendant hired Gow because his position allowed him to influence the press to publish her defamatory statement.” The testimony is irrelevant to the factual point. The Gow testimony at most relates to why Ms. Maxwell engaged Mr. Gow. It does not bear on the factual point, i.e., that Ms. Maxwell, Mr. Gow or Mr. Barden did not exercise any control or authority over the media in the media’s republication of portions of the statement. On this point plaintiff has failed to introduce any contrary evidence. Accordingly, the fact should be deemed admitted.

35. **Undisputed Fact 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. Doc. 1, ¶ 9.

a. **Reply:** Plaintiff “agrees.”

36. **Undisputed Fact 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).

(a) **Reply:** Plaintiff “agreed.”
37. Undisputed Fact 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. Ex.L at 7-8, 12-14. There she met, and became engaged to, her friend’s brother, James Michael Austrich. Id. and 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. Although plaintiff agreed to marry Austrich, she never had any intention of doing so. Ex.N at 127-128.

a. Reply: Plaintiff offers argument, without an affidavit or any other contradictory evidence, regarding whether Plaintiff “voluntarily live[d] independently” or whether a “reasonable person” could assert she was “engaged.” Mr. Austrich and Plaintiff agreed that they were engaged and testified accordingly, as cited. In the absence of admissible evidence to the contrary, the facts as described by her fiancé in his deposition should be deemed admitted.

38. Undisputed Fact 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. Ex.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. Ex.P at 23-24. Plaintiff
remained enrolled at Survivor’s Charter School until March 7, 2002. Ex.O. She was present 56
days and absent 13 days during her time there. Id. Plaintiff never received her high school
diploma or GED. Ex.Q at 475, 483. Plaintiff and Figueroa went “back to school” together at
Survivor’s Charter School. Ex.P at 23-27. The school day there lasted from morning until early
afternoon. Id. at 23-27, 144-146.

a. **Reply:** Plaintiff argues, again without evidentiary support, that the “codes” on
the school records indicate “semester start and end dates” rather than dates Plaintiff was
in school. Her mis-reading of the records is apparent from their face. One column is
labelled “Entry date,” and the next “Withdrawal Date.” Neither say “semester start date”
or “semester end” date. Moreover, the “codes” simply prove the point: Plaintiff
“entered” school (codes E01 and EA1) on the designated “entry date” and withdrew
(either prior to completion, to enter another training program, or who “will continue in
the class/program the next term or school year”) on the dates designated “withdrawal.”
The school records display entry and withdrawal dates for Wellington High School Adult
Program, from June 21, 2000 – August 15, 2000, from August 16, 2000 – August 13,
2001, and from August 14, 2001- September 20, 2001 and then an entry, that same day,
September 20, 2001 at Survivor’s Charter School. Plaintiff would have one believe that
the records show a school on Plaintiff’s official transcript that she never went to,
Wellington High School Adult Program, that indicates she withdrew the very day she
concededly entered Survivor’s Charter School. Her intentional misreading of the record
is yet another attempt to obfuscate Plaintiff’s lack of memory regarding where and when
she went to school, just like she failed to remember 8 jobs she held in 2000 whereas she
claimed to have had one. The test is admissible evidence to the contrary, and Plaintiff
offers none. The flight logs (which show trips in early 2001) do not contradict the evidence because they are during the period of time she was enrolled in “Adult High School,” a place where night classes were taught and where one might circumstantially infer, careful attendance records were not kept.

39. Undisputed Fact 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. Ex.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. Ex.Q at 470-471.

a. Reply: Plaintiff does not dispute the facts as presented, merely argues regarding their significance. The Social Security Administration records detail the five jobs at which she worked in 2000; the month and day of the jobs are irrelevant for purposes of this recitation of facts. Likewise, Plaintiff does not dispute the taxable earnings she made that year, or that she does not “remember” the jobs associated with Southeast Employee Management Company or Oasis Outsourcing (whether they were payroll or not), where she made $3,212 and $2,037 that year. She also “forgot” about her job at Neiman Marcus, where she made $1,440 in 2000, until she was confronted with the SSA records. McCawley Dec. Ex.5 at 53, 470.

40. Undisputed Fact 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 Mar-a-Lago Club in Palm Beach, Florida, beginning on April 11, 2000. Ex.S. Mr. Roberts worked there year-round for approximately 3 years. Id.; Ex.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. Ex.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. Ex.T at 72-73; Ex.U at Mar-a-Lago0212; Ex.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.

a. **Reply:** Plaintiff’s response is misleading. First, she does not dispute that Mr. Roberts, her father began working at Mar-a-Lago in April 2000, nor that he worked there for some time, became acquainted with the head of the spa area and recommended his daughter for a job.

Second, Plaintiff contends that “job postings and job descriptions” “from 2002 and later are irrelevant.” There are no such “job postings” cited. Rather, the job posting cited was from October 2000, the same time that Plaintiff was hired. *Compare* Ex.V (posting for “Saturday October 14 and Sunday October 15”) with calendar for year 2000, showing Saturday and Sundays in October corresponding to those dates.

Finally, Plaintiff points to her own “recollection” as contrary proof. Her “recollection” about when she worked at Mar-a-Lago has shifted dramatically over time. First, she claimed it was 1998. *See* Jane Doe 102 complaint. Then, it was 1999. *See* Doc. 1, Complaint in this matter. Now, in this response she has changed her answer to 2000. Her vague recollections about what year have been off base, no credit should be given to her newfound recollection of which month she worked there. In any event, she presents no admissible credible evidence to contradict Mar-a-Lago’s own records. Ex.U
at Mar-a-Lago0212 (spa not open from Mother’s Day until November 1). Even Plaintiff’s father, a longtime employee of Mar-a-lago admitted that the place “closed down” in the summer. Ex.T at 72-73. Plaintiff simply is not credible in her testimony that she recalls it being a “summer job,” and the fact that she did not work at the spa until at least November 2000 at the age of 17 should be deemed admitted.

41. Undisputed Fact 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. Ex.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. Ex.L at 56; Ex.P at 126. Plaintiff represented that she was employed as a masseuse beginning in January 2001. Ex.M; Ex.N. Plaintiff never mentioned Ms. Maxwell to her then-fiancé, Austrich. Ex.L at 74. Plaintiff’s father never met Ms. Maxwell. Ex.T at 85.

a. Reply: Plaintiff does not actually refute any of the facts set forth above, but rather spends her time discussing different facts. Plaintiff’s father testified to what she told him, that she “was going to learn massage therapy.” Ex.T at 79. She does not contest her father’s testimony that Mr. Epstein came out of the house and greeted her father and that her father never met Ms. Maxwell. See Reply to Undisputed Fact 41. Whether someone can receive a “massage license” under Florida law without a high school equivalency diploma is of no moment. Plaintiff does not dispute she represented
herself as a masseuse to others, in her own handwriting, beginning in January 2001. Exs. M and N. These facts should be deemed admitted.

42. **Undisputed Fact 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. Ex.L at 68, 72. Plaintiff and Austrich thereafter broke up, and Figueroa moved into the Bent Oak apartment with plaintiff. Ex.L at 20; Ex.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. Ex.X; Ex.L at 38-45. Figueroa and plaintiff fled the scene before police arrived. Ex.X. Figueroa was then a convicted felon and a drug abuser on probation for possession of a controlled substance. Ex.Y.

   a. **Reply:** Plaintiff argues relevance regarding these facts, but contests none of them. They should be deemed admitted. Plaintiff’s lies, cheating, and association with a convicted felon and known drug abuser all are relevant in this defamation case concerning her reputation, purported damage to such reputation, and whether she was a known liar, as the January 2015 statement contends.

43. **Undisputed Fact 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. Ex.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. Ex.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.

a. Reply: Plaintiff, again, presents no admissible evidence to contradict these facts, instead arguing their relevance. They should be deemed admitted.

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. Ex.BB. Rodgers maintained a log of all flights on which Epstein and Maxwell traveled with him. Ex.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. Ex.BB. During this same period of time, Plaintiff was employed at various jobs, enrolled in school, and living with her boyfriend.

a. Reply: Plaintiff goes to great lengths to dispute facts other than those presented as Undisputed Fact 44. Her voluminous, repetitive recitation of the flights that Plaintiff was on do nothing to demonstrate the 13 months of flights from July 2001 until August 2002 that Epstein and Maxwell were on without Plaintiff, as reflected in the logs. Her assertions regarding the other flights that she took, commercial or on another plane, do nothing to establish all of the many flights she was not on during 13 of the 22 month period during which Epstein and Maxwell were away from Palm Beach. Plaintiff does
not dispute that Epstein and Maxwell were on the flights without her. The facts as presented by Defendant should be deemed admitted.

45. **Undisputed Fact 45: Plaintiff and Figueroa shared a vehicle during 2001 and 2002.** Plaintiff and Figueroa shared a ’93 white Pontiac in 2001 and 2002. Ex.P at 67; Ex.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. Ex.P at 67-68. Figueroa used that vehicle in a series of crimes before and after Plaintiff left for Thailand. *Id.*; Ex.FF.

   a. **Reply:** Again, the Response has nothing to do with the facts stated. As Plaintiff concedes, she and Mr. Figueroa had one car that they both used. In fact, they traveled to and from school together. Ex.P at 67-68. She also does not dispute that she traveled freely around the Palm Beach area in that vehicle, or that “her car” was used in a series of thefts while she was in Thailand. All should be deemed admitted.

46. **Undisputed Fact 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. Ex.R. She also was employed at Courtyard Animal Hospital (aka Marc Pinkwasser DVM). *Id.*; Ex.W.

   a. **Reply:** Plaintiff admits all of the facts set forth above, aside from the use of the word “gainfully.” They should be deemed admitted.

47. **Undisputed Fact 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. Ex.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.

a. **Reply:** Again, Plaintiff does not refute the facts set forth, she simply offers her own interpretation of those facts. In the absence of any contrary evidence, they should be deemed admitted.

48. **Undisputed Fact 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. Ex.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 212-215. 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, 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. 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 259-260.

a. **Reply:** Plaintiff offers several misleading “contrary” facts, none of which actually address the facts presented herein, namely whether Ms. Maxwell was ever mentioned by any of Epstein’s alleged victims, whether she was the target of their investigation, and whether any of her property was seized from Epstein’s home. Plaintiff cites to numerous inadmissible pieces of evidence on facts other than those. Mr. Rodriguez, a convicted felon for obstructing justice related to the Epstein case, is dead and his deposition testimony is the subject of a motion in limine because Ms. Maxwell has never had the opportunity to cross examine him. Doc. 567 at 14. Ms. Rabuyo likewise is not a witness who has been deposed in this case, and therefore her “testimony” is not admissible against Ms. Maxwell. The message pads are not authenticated by anyone, as will be the subject of a forthcoming motion *in limine*. And there is not one shred of evidence that any child pornography, as opposed to a topless photo of a very adult Ms. Maxwell, were ever found in Epstein’s home. The facts should be deemed admitted, as those proferred by Defendant are based on admissible evidence.

49. **Undisputed Fact 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.” Ex.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. Ex.GG at 289-90.

a. **Reply:** Plaintiff offered no evidence that a nude photograph of *her* was displayed in Epstein’s home. All of the testimony she submits has nothing to do with a nude photograph of herself. The fact should be deemed admitted.

50. **Undisputed Fact 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. Ex.II at 64-65, 194; Ex.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. Ex.II at 194-96. To date, Plaintiff cannot locate the “dream journal.” *Id.*

a. **Reply:** Plaintiff offers no contrary admissible regarding her destruction of her journal and it should be deemed admitted.

51. **Undisputed Fact 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. Doc. 216 ¶¶ 2-11 and referenced exhibits; Doc. 261-1 to 216-8, incorporated by reference. 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. Ex.N at 247-248.
a. **Reply:** Plaintiff offers no evidence to contradict the facts asserted and they should therefore be deemed admitted. Plaintiff’s unsupported spin of those facts should be stricken.

52. **Undisputed Fact 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. Ex.KK. 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.

a. **Reply:** Plaintiff cites inadmissible evidence, and attorney argument, in contradiction of these facts. They should be ignored. The “Victim Notification Letter” is inadmissible hearsay. The psychologist records likewise are inadmissible hearsay. The FBI interview is inadmissible hearsay. Plaintiff’s counsel then flatly misrepresents to the Court her own client’s characterization of the book manuscript, calling it a “fictionalized account.” Plaintiff, contradicting her counsel, testified that the book manuscript is “99% true.”

Q Is there anything -- well, first of all, did you author that entire manuscript?
A Yes, I did.
Q Did anyone else author part of that manuscript?
A Do you mean did anyone else write this with me?
Q Right.
A No.
Q That's all your writing?
A This is my writing.

Q Okay. To the best of your recollection as you sit here right now, is there anything in that manuscript about Ghislaine Maxwell that is untrue?

A I don't believe so. Like I said, there is a lot of stuff that I actually have left out of here.

Q Um-hum.

A. So there is a lot more information I could put in there. But as far as Ghislaine Maxwell goes, I would like to say that there is 99.9 percent of it would be to the correct knowledge.

Q All right. Is there anything that you -- and I understand you're doing this from memory. Is there anything that you recall, as you're sitting here today, about Ghislaine Maxwell that is contained in that manuscript, that is not true?

A You know, I haven't read this in a very long time. I don't believe that there's anything in here about Ghislaine Maxwell that is not true.

EXHIBIT RR at 42-43 (emphasis added).

Plaintiff clearly now would like to spin the book manuscript as “fictionalized” because she is well aware that the “facts” presented by her in that manuscript are contradicted by many other documentary and testimonial records. Yet she offers no admissible evidence that Plaintiff intended the manuscript to be fictional. Citations to social scientists who have not testified in this case and whose work has not even be cited by any expert in this case is wholly improper and should be stricken.

53. Undisputed Fact 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 (Ex.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. Doc. 363 at 363-1 through 363-14.

a. **Reply:** Plaintiff offers no contrary facts and so they should be deemed admitted.

54. **Undisputed Fact 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. Ex.LL. Plaintiff attempts to promote Victims Refuse Silence at every opportunity. Ex.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.

a. **Reply:** Plaintiff offers no contrary evidence and the facts should be deemed admitted.

**II. The Court should strike plaintiff’s statement of “undisputed facts.”**

The summary-judgment procedure is well established. When the summary-judgment non-movant bears the burden of proof at trial, as in the case at bar, the movant may show a *prima facie* entitlement to summary judgment in one of two ways: (1) the movant may point to evidence that negates the non-movant’s claims, or (2) the movant may identify those portions of its opponent’s evidence that demonstrate the absence of a genuine issue of material fact.
Salahuddin v. Goord, 467 F.3d 263, 272-73 (2d Cir. 2006). If the movant makes this showing in either manner, the burden shifts to the nonmovant to identify record evidence creating a genuine issue of material fact. Id. at 273.

Local Civil Rule 56.1(a) carries out this summary-judgment procedure by requiring the summary-judgment movant to set forth “material facts as to which she contends there is no genuine issue to be tried.” Subsection (b) of the rule requires the party opposing summary judgment to set forth a “statement of additional material facts as to which it is contended that there exists a genuine issue to be tried” (emphasis supplied).

Ms. Maxwell has moved for summary judgment; plaintiff has not. As movant, Ms. Maxwell is required under Local Civil Rule 56.1 to enumerate the facts she is asserting as undisputed; as the party opposing summary judgment, plaintiff is permitted—if she can—to introduce admissible evidence creating a genuine issue of material fact. See Fed. R. Civ. P. 56(c)(1).

Plaintiff is confused. Plaintiff believes she—the party opposing summary judgment—must enumerate facts she is asserting as undisputed, and so she has submitted her own Rule 56.1 statement of “undisputed facts.” That gets the summary-judgment procedure exactly backwards. Plaintiff’s “undisputed facts” are irrelevant. Plaintiff cannot avoid summary judgment by proposing “undisputed facts”; she may only do so by creating a genuine issue of material fact as to Ms. Maxwell’s statement of undisputed facts. Accordingly, this Court should strike plaintiff’s statement of “undisputed facts.”

Although Ms. Maxwell as the summary-judgment movant has no duty to respond to plaintiff’s alleged “undisputed facts,” we hasten to add that Ms. Maxwell in fact opposes and disputes most of plaintiff’s alleged “undisputed facts.” For example, Defendant’s Undisputed
Fact 40 includes the statement, “Ms. Giuffre 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.” Yet, Plaintiff sets forth as her own “Undisputed Fact 58” that “Virginia [got] job at Mar-a-Lago in 2000, either months before or just after [her] 17th birthday.” Plaintiff has done nothing more than set forth her “dispute” with Defendant’s Undisputed Fact 40 as her own “undisputed fact.” It makes no sense. See also Plaintiff’s “Undisputed Fact” 63. The other alleged undisputed facts are simply Plaintiff’s assertion of her deposition testimony, and hearsay of her statements to other witnesses, couched as “Undisputed Facts.” Ms. Maxwell strenuously disputes almost all of the alleged “undisputed facts” claiming that she engaged in any sexual acts, misconduct or communications with plaintiff or others; indeed, over the course of two days and thirteen hours of deposition Ms. Maxwell disputed all such allegations.

Because none of Plaintiff’s “undisputed facts” have anything to do with the issues raised by Defendant’s Motion for Summary Judgment, Ms. Maxwell moves to strike plaintiff’s statement of “undisputed facts.”

Conclusion

For the foregoing reasons, Ms. Maxwell requests that the Court deem her Undisputed Facts admitted, and that the Court strike plaintiff’s statement of “undisputed facts.”
Dated: February 10, 2017

Respectfully submitted,

/s/ Laura A. Menninger
Laura A. Menninger (LM-1374)
Jeffrey S. Pagliuca (pro hac vice)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303.831.7364
Fax: 303.832.2628
lmenninger@hmflaw.com

Attorneys for Ghislaine Maxwell
CERTIFICATE OF SERVICE

I certify that on February 10, 2017, I electronically served this Defendant’s Reply to Plaintiff’s Statement of Contested Facts and Plaintiff’s “Undisputed Facts” Pursuant to Local Civil Rule 56.1 via ECF on the following:

Sigrid S. McCawley
Meredith Schultz
Boies, Schiller & Flexner, LLP
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Ft. Lauderdale, FL 33301
smccawley@bsfllp.com
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Paul G. Cassell
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Bradley J. Edwards
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.
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Ft. Lauderdale, FL 33301
brad@pathtojustice.com

J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
StanPottinger@aol.com

/s/ Nicole Simmons
Nicole Simmons
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-------------------------------------------

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-------------------------------------------

Declaration of Laura A. Menninger in Support of
Defendant’s Reply in Support of 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 Reply in Support of Motion for Summary Judgment.¹

2. In Defendant’s Memorandum of Law in Support of Motion for Summary Judgment
(filed Jan. 9, 2017), I included numbered paragraphs corresponding to undisputed facts from the
movant’s perspective as contemplated by Local Civil Rule 56.1(a), together with the citation to
admissible evidence as required by Fed. R. Civ. P. 56(c). See Doc. 541, passim.

¹At 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. On January 9, 2017, I also prepared and served on the Court and counsel, under seal, Defendant’s Statement of Material Undisputed Facts Pursuant to Local Civil Rule 56.1 ("Statement"). Those paragraphs mirror the numbered paragraphs contained within the Memorandum of Law, minus the citations to the evidentiary record. The Statement was filed with the Court in hard-copy and placed in the vault (see Doc.543).

4. Through a clerical oversight, a redacted version of the Statement was not appended to the filed ECF version of the Notice of Motion for Summary Judgment (Doc. 537). However, as noted in the previous two paragraphs, Ms. Maxwell enumerated all undisputed facts in accordance with Local Civil Rule 56.1(a) in:

- Ms. Maxwell’s Memorandum of Law in Support of Motion for Summary Judgment (Doc.541); and
- the Local Rule 56.1 Statement served on the Court and counsel and filed in hard copy with the Court.

5. Attached as Exhibit NN (filed under seal) is a true and correct copy of Defendant, Ghislaine Maxwell’s Initial Disclosure Pursuant to Fed. R. Civ. P. 26, served February 24, 2016.

6. Attached as Exhibit OO (filed under seal) is a true and correct copy of an email correspondence from Plaintiff to Sharon Churcher, dated May 12, 2011, Bates stamped GIUFFRE004096-7; 004028-30.

7. Attached as Exhibit PP (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.
8. Attached as Exhibit QQ (filed under seal) is a true and correct copy of an email correspondence from Plaintiff to Sharon Churcher, dated May 12, 2011, Bates stamped GIUFFRE003959.

9. Attached as Exhibits RR (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.

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


s/ Laura A. Menninger
Laura A. Menninger
CERTIFICATE OF SERVICE

I certify that on February 10, 2017, I electronically served this Declaration of Laura A. Menninger in Support of Defendant’s Reply to Her Motion for Summary Judgment via ECF on the following:

Sigrid S. McCawley  
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cassellp@law.utah.edu

Bradley J. Edwards  
FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L.  
425 North Andrews Ave., Ste. 2  
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brad@pathtojustice.com

J. Stanley Pottinger  
49 Twin Lakes Rd.  
South Salem, NY 10590  
StanPottinger@aol.com

/s/ Nicole Simmons

Nicole Simmons
EXHIBIT NN
Defendant Ghislaine Maxwell’s
Initial F.R.C.P. 26(a)(1)(A) Disclosures

Pursuant to F.R.C.P. 26(a)(1)(A), Defendant Ghislaine Maxwell makes the following disclosures:

I. Identities of Individuals Likely to Have Discoverable Information Relevant to Disputed Facts Alleged with Particularity in the Pleadings

1. Ghislaine Maxwell
c/o Laura A. Menninger, Esq.
Haddon, Morgan & Foreman, P.C.
150 E. 10th Ave.
Denver, CO 80203
303-831-7364
LMenninger@HMFLaw.com

Ms. Maxwell is the Defendant and may have knowledge concerning matters at issue, including the events of 1999-2002 and the publication of statements in the press in 2011-2015.

2. Virginia Lee Roberts Giuffre
c/o Sigrid S. McCawley, Esq.
Boies, Schiller & Flexner LLP
401 East Las Olas Boulevard, Suite 1200
Ms. Giuffre is the Plaintiff and has knowledge concerning the matters at issue in her Complaint, including the events of 1996-2015 and the publication of statements in the press in 2011-2015.

3. Philip Barden
Devonshires Solicitors LLP
30 Finsbury Circus
London, United Kingdom
EC2M 7DT
DX: 33856 Finsbury Square
(020) 7628-7576
Philip.Barden@devonshires.co.uk

Mr. Barden has knowledge concerning press statements by Plaintiff and Defendant in 2011-2015 at issue in this matter.

4. Paul Cassell
College of Law, University of Utah
383 South University Street
Salt Lake City, UT 84112
801-585-5202
paul.cassell@law.utah.edu

Mr. Cassell has knowledge concerning press statements by Plaintiff, Plaintiff’s court pleadings, and Plaintiff’s sworn testimony.

5. Alan Dershowitz
c/o Richard A. Simpson, Esq.
WILEY REIN, LLP
1776 K Street NW
Washington, D.C. 20006
(202) 719-7000

Mr. Dershowitz has knowledge concerning Plaintiff’s false statements to the press, in court pleadings, and in sworn testimony, at issue in this matter.

6. Bradley Edwards
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.
425 N. Andrews Ave., Suite 2
Ft. Lauderdale, FL 33301
(954) 524-2820
brad@pathtojustice.com
Dated: February 24, 2016.

Respectfully submitted,

s/ Laura A. Menninger
Laura A. Menninger (LM-1374)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303.831.7364
Fax: 303.832.2628
lmenninger@hmflaw.com

Attorney for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on February 24, 2016, I electronically served this DEFENDANT GHISLAINE MAXWELL’S INITIAL F.R.C.P. 26(A)(1) DISCLOSURES via e-mail on the following:

Sigrid S. McCawley
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsflp.com

s/ Laura A. Menninger
Laura A. Menninger
Thanks again Shazza, I'm bringing down the house with this book!!

xoxo Jenna

--- On Wed, 11/5/11, Sharon.Churcher@mailonsunday.co.uk <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon.Churcher@mailonsunday.co.uk <Sharon.Churcher@mailonsunday.co.uk>
Subject: Re: Good News!
To: "Virginia Giuffre" <Virginia Giuffre>
Received: Wednesday, 11 May, 2011, 4:17 PM

Don't forget Alan Dershowitz. JE's buddy and lawyer. Good name for your pitch as he reped Chas von Bulow and a movie was made about that case...title was Reversal of Fortune. We all suspect Alan is a pedo and tho no proof of that, you probably met him when he was hanging out w JE

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<td>Virginia Giuffre</td>
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<td>To:</td>
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<td>Sharon Churcher</td>
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<td>Good News!!</td>
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Hi Sharon,

Hello gorgeous, I hope this message comes to you on a bright, sunny day!!! I took your advice about what to offer Sandra and she accepted. We're drawing up a contract through her agent right now and getting busy to meet...
my deadline. Just wondering if you have any information on you from when | you and I were doing interviews about the J.E story. I wanted to put the | names of some of these assholes, oops, I meant to say, pedo's, that J.E | sent me to. With everything going on my brain feels like mush and it would] | be a great deal of help! | | Having fun sweetie? | | Thanks, | | Jenna | | _______________________________________________________| 

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Hi Buddy,

You are absolutely right...nail biting is an understatement of the century!!!
We didn't have any trouble with spiders or anything like that yesterday, it was more my daughter that gave everyone a spook! She wandered off when I turned my back to look at homemade jam and found her outside in the bush chasing the roo's!! My own miniature Tarzan!!!

My fingers and toes are crossed and I'm thinking positive!!!

Much Love,
Jenna

--- On Wed, 8/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject: Re: Virginia Roberts
To: "[redacted]
Received: Wednesday, 8 June, 2011, 11:59 AM

From: Virginia Giuffre
Sent: Wednesday, June 08, 2011 07:27 AM
To: Sharon Churcher
Subject: Re: Virginia Roberts

Dearest Shazza,
Once again you have really outdone yourself... MANY, MANY, THANKS!!!

I took the kids to the Australian Walkabout Park today and enjoyed the scenic walks and many kangaroos. Rob and I had a good chuckle about our adventures at the Reptile Park with you and Mike ... good times!!! Have you heard from Mike? I hope he is well and if you ever speak, tell him I sent a BIG hello.

I really appreciate everything you have helped with, as a friend you have gone beyond the call of duty!!!

I hope we hear back from Jarred soon!!

xoxoxo Jenna

--- On Wed, 8/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject: Virginia Roberts
To: "[redacted]
Cc: "Virginia Giuffre" <[redacted]>
Received: Wednesday, 8 June, 2011, 2:31 AM
Hi Jarred

Hopefully you have Virginia’s book pitch by now.

She has some amazing names which she can share with you in confidence and I think she also has a human interest story that could appeal to the Oprah/female set as well as the Wall Streeters who follow Epstein – a hedge fund king.

Here are a few of our stories about Virginia, plus some examples of the massive US and other international media pickup. Vanity Fair are doing a piece I believe in their August issue. The FBI have reopened the Epstein case due to Virginia’s revelations. I also am attaching a link to a NY Magazine profile of Epstein.....written before his world combusted. The FBI believe he was essentially running a private – and mobile – brothel for some of the world’s richest and most influential men.

He got off the first time round after retaining Kenneth Starr (who witchhunted Bill Clinton) and Alan Dershowitz (von Buelow’s appeal lawyer, who inspired the movie Reversal of Fortune). The US Justice Dept is investigating corruption allegations against at least one prosecutor involved in the case.

Best regards,

Sharon


http://alfonizes.forbes.com/article/03 actividadIP8av (This one, in Forbes Magazine, seems to require subscribing but you get the gist)

http://www.telegraph.co.uk/news/uknews/theroyalfamily/8362890/Prince-Andrew.html


http://nymag.com/nymetro/news/people/n_7912/

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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.
GHISLAINÉ MAXWELL,
Defendant.

APPEARANCES:

BOIES, SCHILLER & FLEXNER LLP
By Sigrid S. McCawley, Esq.
401 East Las Olas Boulevard
Suite 1200
Fort Lauderdale, FL 33301
Phone: 954.356.0011
smccawley@bsfllp.com
Appearing on behalf of the Plaintiff
APPEARANCES:  (Continued)

HADDON, MORGAN AND FORMAN, P.C.
By Laura Menninger, Esq.
Jeffrey S. Pagliuca, Esq.
150 East 10th Avenue
Denver, CO 80203
Phone: 303.831.7364
lmenninger@hmflaw.com
jpagliuca@hmflaw.com
Appearing on behalf of the
Defendant

Also Present:
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.

* * * * * * *

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VIDEO DEPOSITION OF VIRGINIA GIUFFRE, VOLUME II

EXAMINATION

By Ms. Menninger

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<td>Exhibit 4 Photocopy of photograph, with attachments</td>
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<td>Exhibit 6 Photocopy of photograph, with attachments</td>
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<td>Exhibit 8 History of education, with attachment</td>
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<td>Exhibit 10 The Great Outdoors Community Services Association, Inc. Termination Form, with attachments</td>
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<td>DESCRIPTION</td>
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<td>-------------------------------------------------</td>
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<td>Beach Medical &amp; Surgical, printed on 6/28/2016</td>
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<td>of Virginia Giuffre taken May 3, 2016</td>
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<td>2016 by Virginia Giuffre</td>
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<td>Exhibit 18 Ad for Mar-a-Lago Club</td>
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<td>Exhibit 19 The Mar-a-Lago Club, L.C. Employment</td>
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<tr>
<td>Policies, October 28, 1995</td>
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<td>Exhibit 20 Page from the Mar-a-Lago Club Employment Policies, Revised 10/2001</td>
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didn't see them take pictures of the backs of them.
I'm not too sure who.

Q     You don't remember sending to them a
photograph that included this wood around another
photograph?
A     No.
Q     Okay.  You have mentioned a journalist by
the name of Sharon Churcher.
A     Yes.
Q     You are aware that Sharon Churcher
published news stories about you?
A     Yes.
MS. MCCAWLEY:  Objection.
Go ahead.
Q     (BY MS. MENNINGER)  Is anything that you
have read in Sharon Churcher's news stories about you
untrue?
A     I think Sharon did print some things that
I think she elaborated or maybe misheard.  But, I
mean, if you have a specific document to show me, I'd
love to look at it and read it and tell you what I
think.
Q     Is there anything, as you sit here today,
that you know of that Sharon Churcher printed about
you that is not true?
A     Not off the top of my head. If you show me, like, a news clipping article or something, I can definitely read it for you.

Q     Is there anything that you know of that Sharon Churcher has printed about Ghislaine Maxwell that is not true?

A     No, not off -- no, not off the top of my head.

Q     Is there anything that you recall saying to Sharon Churcher that she then printed something different than what you had said to her?

A     Yeah, I've read stuff. I mean, I just -- I can't remember what, but I read something that I think was, Oh, she got that wrong. I can't remember an exact example off the top of my head.

Q     Did you ever complain to Sharon Churcher about things that she got wrong?

A     I didn't see a point. I might have, but I -- I didn't see a point really because it's already printed, you know.

Q     You had a fairly voluminous set of communications with Sharon Churcher by e-mail, correct?

A     Voluminous, like a lot of them?
Q     (BY MS. MENNINGER)  Yes.
A     Yes.

Q     And during any of those communications, do you know whether she printed things about you after you had any of those communications?

MS. MCCAWLEY:  Objection.

A     I don't know. I know a lot of stuff was printed, and I never really stopped to read who printed the article, or wrote the article, I should say. Sorry.

Q     (BY MS. MENNINGER)  Okay. I'll show you Defendant's Exhibit 7.

(Exhibit 7 marked.)

THE DEPONENT:  Thank you.

Q     (BY MS. MENNINGER)  I'll let you read through the statements on the first page there, and if there is anything that is not absolutely true, just put a check by it and we'll come back to it.

A     It's not very clear how she wrote it. "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."

That wasn't an eyewitness statement.

Like, I didn't see her do it. Ghislaine was the one who told me about that; that she's the one who flew
Bill.

Q All right. If you just want to put a check by it, then we'll just come back and talk about each one.

A Okay.

Q Just to move things along.

A Okay. I have made three checkmarks.

Q All right.

MS. MCCAWLEY: And I just -- before you continue, I just want to identify for the record, since this doesn't have any identifiers on it, are you representing that these are statements from Sharon Churcher?

MS. MENNINGER: I'm not representing anything. I'm asking the witness questions about these statements. I asked her is anything on here not true. That's all I asked her.

Q (BY MS. MENNINGER) So which ones did you put checkmarks by, Ms. Giuffre?

A I'd have been -- I'm sorry. "I'd have been about 17 at the time. 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."

Q Okay. And what else did you put a check
by?

A     "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" -- sorry -- "job she did."

Q     Okay. And what else did you put a check by?

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

Q     Other than the three you've just mentioned --

A     Yeah.

Q     -- everything else on here is absolutely accurate?

MS. MCCAWLEY: Objection.

A     Yes. Well, to the best of my recollection, yes.

Q     (BY MS. MENNINGER) All right. What is inaccurate about, "I'd have been about 17 at the time. 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"?

A     Because it makes it kind of sound like an
eyewitness thing.

Q     Okay. Did you say that statement to

Sharon Churcher?

A     I said to Sharon that Ghislaine told me

that she flew Bill in the heli- -- the black

helicopter that Jeffrey bought her, and I just wanted

to clarify that I didn't actually see her do that. I

heard from Ghislaine that she did that.

Q     You heard that from Ghislaine, and then

you reported to Sharon Churcher that you had heard

that from Ghislaine.

A     Correct.

MS. MCCAWLEY: Objection.

A     I heard a lot of things from Ghislaine

that sounded too true -- too outrageous to be true,

but you never knew what to believe, so...

Q     (BY MS. MENNINGER) Okay. And after

Sharon Churcher printed what she said you said, did

you complain to her that it was inaccurate?

A     I might have verbally with her, but again,

I didn't see a point in making a hissy over it

because what was done was done. She had already

printed.

Q     What was inaccurate about, "I used to get

frightened flying with her but Bill" said -- "had the
Secret Service with him and I remember him talking about what a good job she did?"

A     I just don't remember saying that to her. I don't remember saying I remember him talking about what a good job she did.

Q     All right.

A     I just don't remember that at all.

Q     Okay. And I guess, just to be clear, my questions wasn't do you remember saying this to Sharon Churcher; my question is, is that statement accurate?

MS. MCCAWLEY:    Well, objection.

Q     (BY MS. MENNINGER) Did you used to get frightened flying with her?

A     Yes.

Q     Okay. Did Bill have the Secret Service with him?

A     They were there, but not like on the -- not where we were eating.

Q     Do you remember Bill talking about what a good job she did?

A     I don't remember that.

Q     So what is inaccurate about that statement?

A     I just -- it's inaccurate because I don't
remember him talking about what a good job she did.
I don't remember that.

Q Does it inaccurately suggest that Bill had
the Secret Service with him on a helicopter?

MS. MCCAWLEY: Objection.

A Well, not being an eyewitness to it, I
wouldn't be able to tell you. I can't tell you what
I don't know.

Q (BY MS. MENNINGER) And do you believe you
said that statement to Sharon Churcher?

A I mean, Sharon and I talked a lot, and if
she misheard me or just wrote it in the way that she
thought she should, I have no control over that. So
I'm not too sure.

Q Did she record your interviews?

A Some of them. Some of them she didn't. I
mean, we, like -- we, like, met for like a week, and
we spent a lot of time together, and then even after
that we just continued, like, kind of a friendship.

Q All right. What's inaccurate about the
last statement on that page?

A "Donald Trump was also a good friend of
Jeffrey's." That part is true.

"He didn't partake in any" of -- "any sex
with any of us but he flirted with me." It's true
that he didn't partake in any sex with us, and but
it's not true that he flirted with me. Donald Trump
never flirted with me.

Then the next sentence is, "He'd laugh and
tell Jeffrey, 'you've got the life.'" I never said
that to her.

Q     When you say, "he didn't partake in any
sex with any of us," who is "us"?

A     Girls. Just --

Q     How do you know who Donald Trump -- Trump
had sex with?

A     Oh, I didn't physically see him have sex
with any of the girls, so I can't say who he had sex
with in his whole life or not, but I just know it
wasn't with me when I was with other girls.

Q     And who were the other girls that you were
with in Donald Trump's presence?

A     None. There -- I worked for Donald Trump,
and I've met him probably a few times.

Q     When have you met him?

A     At Mar-a-Lago. My dad and him, I wouldn't
say they were friends, but my dad knew him and they
would talk all the time -- well, not all the time but
when they saw each other.

Q     Have you ever been in Donald Trump and
Jeffrey Epstein's presence with one another?

A  No.

Q  What is the basis for your statement that Donald Trump is a good friend of Jeffrey's?

A  Jeffrey told me that Donald Trump is a good friend of his.

Q  But you never observed them together?

A  No, not that I can actually remember. I mean, not off the top of my head, no.

Q  When did Donald Trump flirt with you?

A  He didn't. That's what's inaccurate.

Q  Did you ever see Donald Trump at Jeffrey's home?

A  Not that I can remember.

Q  On his island?

A  No, not that I can remember.

Q  In New Mexico?

A  No, not that I can remember.

Q  In New York?

A  Not that I can remember.

Q  All right. If you could turn to the second page and read through those. Let me know if any of those are inaccurate. Just put a check by them and then we'll come back.

A  Okay.
MS. MCCAWLEY: Before you go, Virginia, I'm going to object to the use of the second page of this document. There's no time frame on it. There's no source reference to it, so it's entirely unclear where this has come from.

Q (BY MS. MENNINGER) Okay. Are you done?

A Yes.

Q Okay. What's the first one you've put a check by?

A "The hammock photo was all over the houses," in parentheses. And Bill Clinton and -- I'm sorry, "Bill Clinton and Andrew," in parentheses, "had to have seen it."

"All over the houses" is not my statement and an exaggeration. They did have that picture in the houses. And I believe, if I remember the conversation correctly, she asked, Could have Bill Clinton and Andrew seen the picture? And I said, Yes, it's possible that they could have seen it.

So, I mean, it's just that -- it's not that it's totally inaccurate. I just think it's like journalist writing, had to have seen it. It doesn't mean they saw it. I just think that if it was in front of them, they would have seen it.

Q So she told you that -- you told her that
the photograph was in the houses -- houses?

A   Yes. I know he had it in New York on his
desk. I know he had it in Palm Beach. I know he had
it in the Caribbean. And I don't know if he had it
in New Mexico. I can't remember New Mexico. Maybe.

Q   Where in Palm Beach was the photograph?
A   The massage room.

Q   Was that -- you did not say that they --
it was all over the houses?
A   Correct. All over the houses would imply
that it's everywhere in the house, so...

Q   You did not say that Andrew and Clinton
had to have seen the photograph?
A   Correct. I -- it was more of a, if they
were in front of it, they would have seen it, kind of
a thing. I'm not saying it right. But it wasn't,
like, had to have seen it.

Q   All right. What's the next statement that
you put a check by?
A   I'm sorry, excuse me. My kids shared a
beautiful cough with me again.

"I spent four years as a millionaire's
personal masseuse."

Q   What is inaccurate about that statement?
A   We now know, according to the timelines
that Mar-a-Lago was able to provide for us, that it
was not four years.

Q How many years was it?
A More like 2-1/2, I think, if I'm right, or
two. I'm sorry, I'm really bad at math. But yes,
the two period.

Q What's the next statement that you have
put a check by?
A "I was a pedophile's dream." I think she
took that out of context and made that her own little
headline.

Q Did you say that to her?
A I said something along the line like, I --
the -- the pedos loved me because I would do
everything that they wanted for them. But do I think
that -- yeah, I -- I know she made that line up
herself, the pedos -- pedophile's dream.

Q What's the next one you put a check by?
A I put a question mark next to the next
one. It says, "Three years later she was reunited
with her family." I don't know what that pertains
to. I don't know what timeline that means.

Q Was there a period of three years where
you were not with your family?
A There's been longer periods than that
that -- when I wasn't with my family. That's what I mean, I don't understand where that comes from.

"Three years later she was reunited with her family."

Q Prior to 2002, was there a period of three years where you were not with your family?
A No.

Q Okay. Did you say to Sharon Churcher, three years later, she was reunited with her family?
A That's what I don't understand. I don't even know what that time periods pertains to.

Q Do you recall saying that to Sharon Churcher?
A No.

Q What's the next one you put a check by?
A "After about two years he started to ask me to entertain his friends."

Q What's wrong with that statement?
A It wasn't two years. I don't know where she got that from.

Q Okay. How long was it?
A Like, I can't give you an exact time period, but it wasn't right in the beginning. It was after my training, or so to speak training. So, I mean, my best guesstimate would be anywhere between four to six months.
Q So you did not say to Sharon Churcher, "After about two years he asked me to entertain his friends"?

A Correct.

Q What's the next one you put a check by?

A That's it. That's all I put a checkmark next to.

Q So the rest of these are absolutely accurate?

A Nothing a journalist writes is absolutely accurate, but it's -- it sounds accurate, yes.

Q Do you recall Jeffrey Epstein saying to you, "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"?

MS. MCCAWLEY: Objection.

Go ahead.

A I do remember him saying that, and I think that's more of a general- -- generalization for all the times that I was sent to the -- where is this -- the island to entertain people. And that would be a quote that she made but from my words saying that's what he said to me when I had to go be with these people that he sent me to.

Q (BY MS. MENNINGER) Did you say that
sentence to her?

MS. MCCAWLEY: Objection.

A I -- I can't remember. Like I said, I think it's more of a generalization.

Q (BY MS. MENNINGER) Did you meet Al Gore?

A Yes.

Q Did you meet Heidi Klum?

A Yes.

Q Did you meet Naomi Campbell?

A Yes.

Q Did you go on a six-week trip with Epstein in 2001?

A Yeah. Yes. Sorry.

Q When in 2001 did you go on a six-week trip with him?

A I don't remember exactly when it was, but it's that -- it's the one where we went to Tangier, Morocco, England. I can't remember where else we went. France.

Q Did the FBI tell you that Epstein had hidden cameras watching you the entire time, even when you were in the bathroom?

A Yes.

Q Did the FBI tell you "Everything he did was illegal because I was under age"?
A     Yes.

Q     Who in the FBI told you that?

A     Whichever agent I was talking to.

Q     Which agent were you talking to?

A     I can't remember. I know I was talking to Jason Richards, and there was a girl, I think -- I want -- I want to say her name was Christina Pryor, just off the top of my head. And then I think there was two other agents actually at the consulate building. I don't remember their names. Very hazy.

Q     When was this conversation with the FBI?

A     After Sharon printed the articles, the first articles that came out. I don't know how many she printed, but when the first articles came out, after that the FBI contacted me.

Q     And was the statement that the FBI told you "Everything he did was illegal because I was under age," in response to you telling them that you were age 15 when you met Jeffrey?

MS. MCCAWLEY: Objection.

A     Well, that was the closest proximity I had to go off of.

Q     (BY MS. MENNINGER) Okay.

A     So, yes. Although I still was under age, I mean, even if I was 16 and 17.
Q     Okay. And then if you could do the last page, same way; a check by anything that's not absolutely accurate.

MS. MCCAWLEY: Okay. I'm going to object to this as the last page has no identifier of time or source on it.

A     Okay. I'm ready.

Q     (BY MS. MENNINGER) All right. Which ones are inaccurate?

A     The first one is, "Virginia got a part-time job as a changing room assistant." I was a full-time person there. Sorry.

Q     Okay. So did you say that to Sharon?

A     Again, I don't remember that exact conversation, but I know it was a full-time job, and -- I mean, full-time as in the, you know, the 9 to 5 or whatever hours it was, so it wasn't part-time. I don't remember the exact conversation that we had.

Q     Okay. What's the next thing you put a check by?

A     I put a question mark next to, "Another lady led me into Jeffrey's bedroom. The lady walked me straight through into the massage room."

I have no idea what circumstance that
pertains to. Again, I don't know what that means. I don't even know what other lady she's talking about. So...

Q So you don't recall saying that to Sharon Churcher?

A Correct. I don't even know what it means.

Q Okay. What's the next one you have a check by?

A "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."

Q All right. What's wrong about that statement?

A Well, again, I just want to say that the four years was inaccurate based upon memory and not an actual timeline that we were able to get.

Q Did you say that to Sharon Churcher, that it was four years?

A I don't know if I said that to her or -- oh, yeah, did I tell her it was four years? Yes, I did. I'm sorry.

Q Okay. What else did you put a check by?

A Well, this one is a question mark again. "Radar online has obtained exclusive diary entries of a Teen Sex Slave."
It wasn't really a diary. It was, like, I don't know how many pages of something that I wrote, and Sharon used it, so...

Q     Did you tell Sharon it was your diary entry?
A     She knew it wasn't a diary entry. No.
Q     Okay. Were you a teen sex slave?
A     Yes.
Q     What's the next one you have a checkmark by?
A     "I also saw Prince Andrew at a Ranch in New Mexico."
Q     Did you tell that to Sharon Churcher?
A     No. And I think it's a mistake. Maybe she meant somewhere else, but because we had been talking about so much, maybe she just put New Mexico. I don't think Sharon intentionally lied on any of these. I just -- I think we talked so much over a period of a week, and then after that we had phone conversations, and so on and so forth, that some of the information just got misheard or mishandled, or whatever.
Q     And what was printed was inaccurate?
A     Was that printed? I don't -- I don't remember reading that in the papers, but if it was
printed it's inaccurate.

Q     Do you recall reading any of the ones that you put a checkmark by in the papers?
A     There's been so much printed, it's hard for me to remember. I mean, yes, it does sound like stuff I read before.

Q     When you spoke with Sharon Churcher, you agreed to waive your anonymity, right?
A     I did.

Q     Why did you agree to do that?
A     I felt it was time for me to tell my story. I felt it was a good time for me to come forward. I had done so much healing, and I thought that it would be good for other people to hear what's going on, how it's happening, how vulnerable other girls can be and not even know the damage that it causes later in life. And I just thought it would be the right thing to do to come forward.

Q     You authorized her to publish your name?
A     I did.

Q     And your photograph?
A     Yes.

Q     In 2011?
A     I think that was the year, yes.

Q     You posed for photographs with her,
I, VIRGINIA GIUFFRE, do hereby certify that
I have read the foregoing transcript and that the
same and accompanying amendment sheets, if any,
constitute a true and complete record of my
testimony.

____________________________
Signature of Deponent

( ) No amendments
( ) Amendments attached

Acknowledged before me this ______ day
of ______________, 20__.

Notary Public: ________________
My Commission Expires: _________
Seal:

PJH
STATE OF COLORADO)

) ss. REPORTER'S CERTIFICATE

COUNTY OF DENVER )

I, Pamela J. Hansen, do hereby certify that I am a Registered Professional Reporter and Notary Public within the State of Colorado; that previous to the commencement of the examination, the deponent was duly sworn to testify to the truth.

I further certify that this deposition was taken in shorthand by me at the time and place herein set forth, that it was thereafter reduced to typewritten form, and that the foregoing constitutes a true and correct transcript.

I further certify that I am not related to, employed by, nor of counsel for any of the parties or attorneys herein, nor otherwise interested in the result of the within action.

In witness whereof, I have affixed my signature this 23rd day of November, 2016.

My commission expires September 3, 2018.

_______________________________
Pamela J. Hansen, CRR, RPR, RMR
216 - 16th Street, Suite 600
Denver, Colorado  80202
Epstein did invite two young brunettes to a dinner which he gave on his Caribbean island for Mr. Clinton shortly after he left office.

I'd have been about 17 at the time. 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.

I remember she was very excited because she got her license 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 don't remember seeing Bill again on the trip but I assume Ghislaine flew him back.

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

Virginia said that yet another American liberal icon, Senator George Mitchell, frequently visited Epstein's New York residence. Mr. Mitchell, aged 77, was very close to Jeffrey, Virginia recalled.

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.

Donald Trump was also a good friend of Jeffrey's. He didn't partake in any sex with any of us but he flirted with me. He'd laugh and tell Jeffrey, 'you've got the life.'
Ghislaine took nude picture of me lying naked in a hammock, posed with my legs open, a bit provocatively that I gave to Jeffrey for his birthday.

The hammock photo was "all over the houses" and Bill Clinton and Andrew "had to have seen" it.

I spent four years as millionaire's personal masseuse.

I was living on the streets, beaten up and slept with at least two older men in return for food.

While on the streets, I slept with men for money.

I was a paedophile’s dream.

Three years later she was reunited with her family.

After about two years, he started to ask me to 'entertain' his friends.

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.”

The way it usually worked was I'd been 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.

I met famous friends of his such as Al Gore and Heidi Klum and Naomi Campbell.

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

FBI told me that Epstein had hidden cameras watching me the entire time even when I was in the bathroom. I was so embarrassed.

The FBI told me everything he did was illegal because I was under age.
Virginia got a part-time job as a changing room assistant.

I told Ghislaine I wanted to become a masseuse and she said she worked for a very wealthy gentleman who was looking for a traveling masseuse. I’d get training and be paid well.

Another lady led me into Jeffrey’s bedroom. The lady walked me straight through into the massage room.

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.

Radar Online has obtained exclusive "Diary entries" of "Teen Sex Slave".

I led Prince Andrew into the upstairs bathroom next to the room I was staying in.

I was doing my best trying to put on a good show for him by slowly undressing and started to pour a bath.

He was caressing every part of my naked body and filling my head with endless compliments about my blossoming figure.

He paid careful attention to my toes and was licking them.

I also saw Prince Andrew at the Ranch in New Mexico.
Hi Buddy,

I hope you are stopping to smell the daffodils once in a while and having a good day!! I am so excited today because I can go sign with an agent as my contract is finished with "Mail On Sunday"...YEAH!! Sandra and I have been working really hard to get me ready for my trip to the U.S in a few weeks and I was wondering if I could use your advice again. She has got an INTL agent who is interested in speaking with me and I don't want to say "Yes" to the first bite because I'm not sure what to look for in an agent. What could you recommend that I do? I will send Jarred and Irene (your recommended agent) a copy of the synopsis and sample chapters but how do I choose the right one for "The Story"? Do you know anyone else that might be interested in this as well? If so, I am keen on speaking with anyone who might be. I am sooooooo excited about this and will keep you updated with the progressing events. When I am in New York we have to meet up for some city shopping and take the kids to Central Park to see the Zoo, given there will be no masturbating kangaroo's for you to make friends with, but who know's? I am looking forward to showing Robbie around and he's got some family out there and well we have to catch up with. Such busy times, but I'm loving it!! Anyways I hope your taking care and catch me up on all your fun times!!

Take care,
Jenna
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.

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Also Present:
Brenda Rodriguez, Paralegal
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.

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I N D E X

EXAMINATION PAGE

MS. MENNINGER 8

PRODUCTION REQUEST(S):

(None.)
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Some names have been changed in order to protect other people.

Q (BY MS. MENNINGER)  Protect their privacy?
A Protect their privacy, yeah, I would say, just not getting them involved in, if this were to ever go public.

Q Well, again, without rereading the whole manuscript --
A Reading it, yeah. I'm trying to see if I can -- see something in here.

Q Let me narrow my question and maybe that will help.
A Yes.

Q Is there anything -- well, first of all, did you author that entire manuscript?
A Yes, I did.

Q Did anyone else author part of that manuscript?
A Do you mean did anyone else write this with me?
Q Right.
A No.

Q That's all your writing?
A This is my writing.

Q Okay. To the best of your recollection,
as you sit here right now, is there anything in that manuscript about Ghislaine Maxwell that is untrue?

A     I don't believe so. Like I said, there is a lot of stuff that I actually have left out of here.

Q     Um-hum.

A     So there is a lot more information I could put in there. But as far as Ghislaine Maxwell goes, I would like to say that there is 99.9 percent of it would be to the correct knowledge.

Q     All right. Is there anything that you -- and I understand you're doing this from memory. Is there anything that you recall, as you're sitting here today, about Ghislaine Maxwell that is contained in that manuscript, that is not true?

A     You know, I haven't read this in a very long time. I don't believe that there's anything in here about Ghislaine Maxwell that is not true.

MR. EDWARDS:  I'd just ask, Counsel, if you have anything specific to show her about Ghislaine Maxwell --

MS. MENNINGER:  I'll ask questions.

MR. EDWARDS:  -- I'll have her look at it.

MS. MENNINGER:  I'll ask questions.

MR. EDWARDS:  I know, but I want the record clear that if she hasn't read it in a long
I, VIRGINIA GIUFFRE, do hereby certify that
I have read the foregoing transcript and that the
same and accompanying amendment sheets, if any,
constitute a true and complete record of my
testimony.

________________________________
Signature of Deponent
( ) No Amendments
( ) Amendments Attached

Acknowledged before me this
_____ day of ______________, 2016.

Notary Public: _______________________
Address: _____________________________

My commission expires _________________

Seal:

KAM
STATE OF COLORADO

) ss. REPORTER'S CERTIFICATE

COUNTY OF DENVER )

I, Kelly A. Mackereth, do hereby certify that I am a Registered Professional Reporter and Notary Public within the State of Colorado; that previous to the commencement of the examination, the deponent was duly sworn to testify to the truth.

I further certify that this deposition was taken in shorthand by me at the time and place herein set forth, that it was thereafter reduced to typewritten form, and that the foregoing constitutes a true and correct transcript.

I further certify that I am not related to, employed by, nor of counsel for any of the parties or attorneys herein, nor otherwise interested in the result of the within action.

In witness whereof, I have affixed my signature this 11th day of May, 2016.

My commission expires April 21, 2019.

____________________________
Kelly A. Mackereth, CRR, RPR, CSR
216 - 16th Street, Suite 600
Denver, Colorado 80202
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----------------------------------------------X

VIRGINIA GIUFFRE,

Giuffre,

-against-

GHISLAINE MAXWELL,

Maxwell.

-----------------------------------------------X

APPEARANCES:

Counsel for Giuffre

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    Jeffrey S. Pagliuca, Esq.
Sweet, D.J.

The defendant Ghislaine Maxwell ("Maxwell" or the "Maxwell") has moved pursuant to Rule 56, Fed. R. Civ. P., for summary judgment dismissing the complaint of plaintiff Virginia L. Giuffre ("Giuffre" or the "Giuffre") alleging defamation. Upon the facts and conclusions set forth below, the motion is denied.

I. Prior Proceedings

Since the filing of the complaint on September 21, 2015, setting forth Giuffre's claim of defamation by Maxwell, this action has been vigorously litigated, as demonstrated by the 704 docket entries as of March 8, 2017. At issue is the truth or falsity of a January 2015 statement issued by Maxwell. Discovery has proceeded, a joint pretrial order has been filed, and the action is set for trial on May 15, 2017.

The instant motion was heard and marked fully submitted on February 16, 2017.
II. The Facts

The facts have been set forth in Maxwell's Memorandum of Law in Support of Maxwell's Motion for Summary Judgment, Southern District of New York, Local Rule 56.1; Giuffre's Statement of Contested Facts and Giuffre's Undisputed Facts; and Maxwell's Reply to Giuffre's Statement of Contested Facts and Giuffre's Undisputed Facts pursuant to Local Civil Rule 56.1. They are not in dispute except as noted below.

1. In early 2011, Giuffre, in two British tabloid interviews, made numerous false and defamatory allegations against Maxwell. In the articles, Giuffre made no direct allegations that Maxwell was involved in any improper conduct with Jeffrey Epstein ("Epstein"), who had pleaded guilty in 2007 to procuring a minor for prostitution. Nonetheless, Giuffre suggested that Maxwell worked with Epstein and may have known about the crime for which he was convicted.

Giuffre has denied that the allegations she made against Maxwell were false and defamatory. She noted that she did give an interview to journalist, Sharon Churcher ("Churcher"), in which she described Maxwell’s role as someone
who recruited or facilitated the recruitment of young females for Epstein, that she was interviewed by the FBI in 2011, and that she discussed Maxwell’s involvement in the sexual abuse.

2. In the articles, Giuffre 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.”

Giuffre did not contest this statement but noted it is irrelevant.

3. In response to the allegations, Maxwell’s British attorney, working with Ross Gow (“Gow”), Maxwell’s public relations representative, issued a statement on March 9, 2011, denying “the various allegations about [Maxwell] that have appeared recently in the media. These allegations are all entirely false.”

Giuffre has denied that Maxwell’s British attorney, Philip Barden (“Barden”), “issued a statement,” noting that it appears to have the contact “Gow” and a reference to Devonshire Solicitors.
4. The March 9, 2011 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 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, 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

Giuffre has noted it is unclear if the original included the italics that are inserted above.

5. In 2008, two alleged victims of Epstein brought an action under the Crime Victims’ Rights Act (the “CVRA Action”) 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.


Giuffre has denied the final sentence fragment.

7. The issue presented in the joinder motion was narrow: whether Giuffre should be permitted to join the CVRA

Giuffre has denied that the issues presented in her joinder motion were narrow and has noted that the issues presented by the joinder motion and related pleadings were multiple and complex, requiring numerous details about Giuffre’s sexual abuse and the listing of the perpetrators of her abuse. In a pleading explaining why the motion was filed, see Jane Doe 1 and Jane Doe 2 v. United States, No. 9:08-cv-80736-KAM, Docket No. 291 at 18-26 & n.17 (S.D. Fla. Jan. 21, 2015), Giuffre’s lawyers specifically listed nine separate reasons why Jane Doe 3’s allegations that Alan Dershowitz (“Dershowitz”) had sexually abused her were relevant to the case and appropriately included in the relevant filings. Additionally, Giuffre states that Judge
Marra’s ruling concluded that certain allegations were not necessary “at this juncture in the proceedings,” adding that “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.” CVRA Mot. Op. at 5-6. Giuffre notes that the CVRA litigation continues and no trial has been held as of the filing of this motion so that the extent to which these factual details will be used at trial has not yet been determined. See Docket Sheet, Jane Doe 1 and Jane Doe 2 v. United States, No. 9:08-cv-80736-KAM.

8. At the time they filed the motion, 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 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.

Giuffre has noted her denial as set forth to Statement 7 above.
9. As the district court noted in ruling on the joinder motion, Giuffre “name[d] several individuals, and she offers details about the type of sex acts performed and where they took place.” CVRA Mot. Op. at 5. The court ruled that “these lurid details are unnecessary,” explaining that “[t]he factual details regarding whom and where the Jane Does engaged in sexual activities are immaterial and impertinent . . . , especially considering that these details involve nonparties who are not related to the respondent Government.” Id. Accordingly, “[t]hese unnecessary details shall be stricken.” Id. The court then struck all Giuffre’s factual allegations relating to her alleged sexual activities and her allegations of misconduct by non-parties. Id. at 6. The court said the striking of the “lurid details” was a sanction for Giuffre’s improper inclusion of them in the motion. Id. at 7.

Giuffre has noted her denial as set forth in Statement 7 above.

10. The district court in the CVRA Action found not only that the “lurid details” were unnecessary but also that the joinder motion itself was “entirely unnecessary.” Id. at 7. 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 Giuffre’s joinder motion. Id. at 10.

Giuffre has noted her denial as set forth in Statement 7 above.

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

• Maxwell “approached” Giuffre in 1999 when Giuffre was “fifteen years old” to recruit her into the scheme.

• Maxwell was “one of the main women” Epstein used to “procure under-aged girls for sexual activities.”

• Maxwell was a “primary co-conspirator” with Epstein in his scheme.

• She “persuaded” Giuffre 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 Giuffre began giving Epstein a massage, he and Ms. Maxwell "turned it into a sexual encounter."

- Epstein "with the assistance of" Maxwell "converted [Giuffre] into . . . a 'sex slave.'" *Id.* Giuffre was a "sex slave" from "about 1999 through 2002."

- Maxwell also was a "co-conspirator in Epstein's sexual abuse."

- 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."

- Maxwell "participat[ed] in the sexual abuse of [Giuffre] and others."

- Maxwell "took numerous sexually explicit pictures of underage girls involved in sexual activities, including [Giuffre]." *Id.* She shared the photos with Epstein.

- As part of her "role in Epstein’s sexual abuse ring," Maxwell "connect[ed]" Epstein with "powerful individuals" so that Epstein could traffic Giuffre to these persons.

- Giuffre was "forced to have sexual relations" with Prince Andrew in "[Maxwell’s] apartment" in London. Maxwell "facilitated" Giuffre’s sex with Prince Andrew "by acting as a ‘madame’ for Epstein."

- Maxwell "assist[ed] in internationally trafficking" Giuffre and "numerous other young girls for sexual purposes."

- Giuffre was "forced" to watch Epstein, Maxwell and others "engage in illegal sexual acts with dozens of underage girls."

See CVRA Joinder Mot.  

11
Giuffre has denied the reference to "lurid details" and has noted her denial as set forth in Statements 6 and 7 above and that the testimony from numerous witnesses has corroborated the statements Giuffre made in her joinder motion:

- Johanna Sjoberg ("Sjoberg") May 18, 2016
  Dep. Tr. at 8-9, 13, 33-35, 142-143.
- Anthony Figueroa ("Figueroa") June 24, 2016
  Dep. Tr. Vol. 1 at 96-97 and 103.
- Rinaldo Rizzo ("Rizzo") June 10, 2016
  Dep. Tr. at 52-60.
- Lynn Miller's May 24, 2016
  Dep. Tr. at 115.
- Joseph Recarey's June 21, 2016
  Dep. Tr. at 29-30.
- David Rodgers' June 3, 2016
  Dep. Tr. at 18, 34-36.
- Excerpted Rodgers
  Dep. Ex. 1 at flight #s 1433-1434, 1444-1446, 1464-1470, 1478-1480, 1490-1491, 1506, 1525-1526, 1528, 1570, and 1589.
- Nadia Marcinkova ("Marcinkova")
  Dep. Tr. at 10:18-21; 12:11-15; etc.
• Sarah Kellen ("Kellen") Dep. Tr. at 15:13-18; 20:12-16; etc.

• Epstein Dep. Tr. at 116:10-15; 117:18-118:10; etc.

• Juan Alessi ("Alessi") Dep. Tr. At 28, 52-54.

• U.S. Attorney Victim Notification Letter GIUFFRE002216-002218.

• July 2001 New York Presbyterian Hospital
  Records GIUFFRE003258-003290.

• Judith Lightfoot psychological records
  GIUFFRE005431-005438.

• Message Pad evidencing Maxwell arranging to
  have underage girls and young women come to
  Epstein’s home GIUFFRE001386-001571.

• "Black Book" in which Maxwell and other
  household staff maintained a roster of
  underage girls including [REDACTED],
  [REDACTED], and [REDACTED], who were
  minors at the time the Palm Beach Police’s
  Investigation of Jeffrey Epstein
  GIUFFRE001573-00669.
• Sex Slave books Epstein ordered from Amazon.com at GIUFFRE006581.

• The folder Maxwell sent to Thailand with Giuffre bearing Maxwell’s phone number GIUFFRE003191-003192.

• The Palm Beach Police Report showing that Epstein used women and girls to collect underage girls for his abuse GIUFFRE005614-005700.

• Epstein’s Flight Logs showing that Maxwell flew with Giuffre 23 times GIUFFRE007055-007161.

12. In the joinder motion, Giuffre also alleged she was “forced” to have sex with 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.” CVRA Joinder Mot. at 5-6.

Giuffre has noted her denial as set forth in Statements 7 and 11 above.
13. Giuffre 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.

Giuffre has admitted making this statement and has noted since discovered evidence that indicates she was mistaken on the exact timeframe of her abuse and was with Maxwell and Epstein from the years 2000-2002.

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

Giuffre has denied that she suggested that the Government was part of Epstein’s conspiracy to commit sex offenses and has noted that the CVRA Action deals with whether the Government failed in their responsibilities to the victims
to inform the victims that the Government was working out an
NPA, that the Government did fail to so inform the victims, and
that it intentionally did not inform the victims because the
expected serious objection from many of the victims might
prevent the Government from finalizing the NPA with Epstein.

15. The other "Jane Doe" who joined Giuffre's motion
who alleged she was sexually abused on "many occasions" by
Epstein was unable to corroborate any of Giuffre's allegations.

Giuffre has denied the statement and noted that the
other Jane Doe could corroborate many of Giuffre's allegations
based on a similar pattern of abuse by Epstein that she
suffered, that she did not know Giuffre, and further has noted
[REDACTED] who was deposed in this case, and who was a
minor, corroborates the same pattern of abuse.

16. In her multiple and lengthy consensual interviews
with Churcher three years earlier, Giuffre told Churcher of
virtually none of the details she described in the joinder
motion.
Giuffre has denied the statement and noted that absence of any citation or evidence on this point and that the statement here is knowingly false based on the articles and Giuffre’s deposition.

17. As Giuffre and her lawyers expected, before Judge Marra in the CVRA Action could strike the “lurid details” of Giuffre’s allegations in the joinder motion, members of the media obtained copies of the motion.

Giuffre has denied the statement as set forth in Statement 7 above.

18. At the direction of Barden, on January 2, 2015, Gow sent to numerous representatives of British media organizations an email containing “a quotable statement on behalf of Maxwell” (the “Press Release”). The email was sent to more than six and probably fewer than 30 media representatives. It was not sent to non-media representatives.

Giuffre has denied that “[a]t Mr. Barden’s direction, on January [2], 2015, Gow sent to numerous representatives of British media organizations an email containing ‘a quotable
statement on behalf of Maxwell’” and has noted that Gow produced an email exchange he had with Maxwell in which Maxwell directs Gow to send the Press Release as follows:

From: G Maxwell <GMax1@ellmax.com>
Date: Fri, 2 Jan 2015 20:14:53 +0000
To: Ross Gow<ross@acultyreputation.com>
Cc: Philip Barden<philip.barden@devonshires.co.uk>
Subject: FW: URGENT - this is the statement

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 Derschowitz 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.

Giuffre has further noted that chronologically, this email comes at the end of various other email exchanges between Maxwell and Gow that discuss issuing a press release and that the subject line of this email that Maxwell wrote to Gow states “URGENT - this is the statement,” thereby instructing Gow to release this statement to the press. Additionally, Giuffre notes that shortly after Maxwell sent this email to Gow directing him to release the Press Release, Gow distributed it to multiple media outlets, and that no email has been produced in which
Barden directed Gow to issue this press release. At his deposition, Gow authenticated this email and confirmed that Maxwell authorized the statement.

Giuffre has noted that the email and Gow’s testimony establish that Maxwell, not Barden, directed and “command[ed]” Gow to publish the defamatory statement and the first sentence of the statement is false and the second sentence - “This email was sent to more than 6 and probably less than 30 media representatives” - omits the fact that not only did Gow admit to emailing the statement to the press, but he also read it to over 30 media representatives over the phone. Giuffre has denied the statement.

19. Among the media representatives who received the Press Release were Martin Robinson of the Daily Mail, P. Peachey of The Independent, Nick Sommerlad of The Mirror, David Brown of The Times, 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 Maxwell to Giuffre’s allegations in the motion.
Giuffre has denied the second sentence and has noted there is no record evidence that Gow (or anyone else) “selected” journalists “for a response,” or that there was any selection process and that Gow testified that anyone who inquired received a reference to the Press Release.

20. The email to the media members read:

To Whom It May Concern,

Please find attached a quotable statement on behalf of 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 publicized 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.

Giuffre has noted that the body text of the email that was sent to news media was cropped and the headings and metadata were omitted and has further noted the image of the email set forth below.
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.purhe@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 Virginia 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 Derschowitz 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

21. Barden, who prepared the Press Release, did not intend it as a traditional press release solely to disseminate information to the media, and he intentionally did not pass it through a public relations firm, such as Gow’s firm, Acuity Reputation.
Giuffre has denied the statement and has noted that the Barden Declaration should not be considered. She has further noted that there is no evidence to support any assertion of Barden’s intent and that Maxwell gave the statement to Gow with instructions to publish it. Giuffre also has denied that the statement did not pass “through a public relations firm, such as Gow’s firm, Acuity Reputation” and has noted that record documentary evidence and testimony establish that this statement was disseminated through Gow’s firm, Acuity Reputation.

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

Giuffre has denied this statement and any statement of Barden’s intent and that there was any “republication” by the
press as a matter of law as the press did not “republish” the press statement under New York law and that the allegations in the statement are “false,” and cites to the evidence set forth in Statement 11 above.

Giuffre has further disputed that the harm to Maxwell’s reputation could be mitigated by the media’s inquiry into and scrutiny of Giuffre’s allegations, because a deeper inquiry would only reveal additional evidence corroborating Giuffre’s allegations, and has noted that the record does not establish who drafted the Press Release, and that it was ultimately Maxwell who “noted” anything because it is her statement and that she directed that it be sent to the media and public.

Giuffre has also disputed that her allegations have changed over time, “dramatically” or otherwise, that the Press Release “suggest[ed]” that her allegations are “obvious lies,” because the Press Release affirmatively stated that her allegations are “obvious lies” there is no subtlety, suggestion, or statement of opinion here.
23. 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 Giuffre’s allegations without conducting any inquiry of their own. Accordingly, in the statement he repeatedly noted that Giuffre’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 Maxwell considered the publication of Giuffre’s obviously false allegations and the legal indefensibility of their own conduct.

Giuffre has denied this statement and the statement that Barden repeatedly noted that Giuffre’s allegations were “defamatory” as he did not “note” anything in the statement, nor does Maxwell cite to any record evidence that he did.

Giuffre further denies the sentence, “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 Maxwell considered the publication of Giuffre’s obviously false allegations and the legal indefensibility of their own conduct,” as there is no record
evidence in support of this claim, and Maxwell has not cited any.

24. Consistent with his purposes as described by Maxwell, Gow’s emails prefaces the statement with the following language: “Please find attached a quotable statement on behalf of Maxwell.” The statement was intended to be a single, one-time only, comprehensive response, quoted in full, to Giuffre’s December 30, 2014, allegations that would give the media Maxwell’s response. The purpose of the prefatory statement was to inform the media-recipients of this intent.

Giuffre has disputed the statement and any statement relating to Barden’s “purposes,” as explained above, and has noted that Gow repeatedly issued this statement via email and over the phone for months on end and that Maxwell instructed them to publish it by telling them it was “quotable,” and hired a press agent to distribute it to the press with the intent for the press to publish the Press Release.

25. Giuffre 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.

Giuffre has denied that she engaged in activities to bring attention to herself but has noted that she has taken action to aid in the prosecution of her abusers, and she seeks to bring light to the rights of victims of sexual abuse.

26. Giuffre 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, Giuffre has "dedicated her professional life to helping victims of sex trafficking."

28. Giuffre repeatedly has sought out media organizations to discuss her alleged experience as a victim of sexual abuse.
Giuffre has denied the statement and noted that she was approached by numerous media outlets and refused to speak to most of them, that media organizations sought her out and she did not seek them out.

29. Giuffre 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.”

Giuffre has stated that this mischaracterizes these activities, that it was against a backdrop of seeking psychological counseling that she drafted the manuscript as an “act of empowerment” and “a way of reframing and taking control over the narrative.” Pl.’s Opp’n at 60. Giuffre notes that she ultimately decided not to publish the manuscript. See Giuffre Dep. Tr. 249:16-18; 250:19-251:3.

30. Giuffre was required by Interrogatory No. 6 to identify any false statements attributed to Maxwell that were “published globally, including within the Southern District of New York,” as Giuffre alleged in Paragraph 9 of Count One of her complaint. In response, Giuffre identified the Press Release and
nine instances in which various news media published portions of the Press Release in news articles or broadcast stories.

Giuffre has denied this statement. There is no "republication" as a matter of law and Maxwell possesses the knowledge as to where the defamatory statements were published and Giuffre has noted that she has provided a sampling of Maxwell's defamatory statements published by the news media and that Maxwell caused her statement to be published in an enormous number of media outlets.
<table>
<thead>
<tr>
<th>Date</th>
<th>Nature</th>
<th>Publishing Entity</th>
<th>Statement/URL</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 2, 2015</td>
<td>Internet</td>
<td>Ross Gow</td>
<td>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 publicized 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.</td>
<td><a href="http://www.theboltonnews.co.uk/news/national/11700192-Palace-denies-Andrew-sex-case-claim/">Website Link</a></td>
</tr>
<tr>
<td>January 3, 2015</td>
<td>Internet</td>
<td>Huffington Post</td>
<td><a href="http://www.huffingtonpost.co.uk/2015/01/03/duke-of-york-sex-abuse-claims-n-6409508.html">http://www.huffingtonpost.co.uk/2015/01/03/duke-of-york-sex-abuse-claims-n-6409508.html</a></td>
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<tr>
<td>January 5, 2015</td>
<td>Internet</td>
<td>AOL UK</td>
<td><a href="http://www.aol.co.uk/video/ghislaine-maxwell-declines-to-comment-on-prince-andrew-allegations-518587500/">http://www.aol.co.uk/video/ghislaine-maxwell-declines-to-comment-on-prince-andrew-allegations-518587500/</a></td>
<td><a href="http://www.aol.co.uk/video/ghislaine-maxwell-declines-to-comment-on-prince-andrew-allegations-518587500/">Website Link</a></td>
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Two newest articles

1. [Website Link](https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/)
2. [Website Link](http://www.mirror.co.uk/news/uk-news/prince-andrews-pal-ghislaine-maxwell-5081971)
31. In none of the nine instances was there any publication of the entire Press Release.

Giuffre has noted extensive evidence of the mass distribution of Maxwell’s defamatory statement to over 66 million viewers as stated by her expert witness James Jansen ("Jansen").

32. Maxwell and her agents exercised no control or authority over any media organization, including the media identified in Giuffre’s response to Interrogatory No. 6, in connection with the media’s publication of portions of the Press Release.

Giuffre has disputed this statement and noted it is completely devoid of record evidence and that the record establishes that Maxwell hired Gow because his position allowed him to influence the press to publish her defamatory statement, Dep. Tr. at 13:9-16; 15:18-16:3; 109:12-22; 110:16-21; 111:3-7, and that Maxwell caused her statement to be published by numerous major news organizations with wide readership all over the globe.
33. Eight years after Epstein’s guilty plea in Florida, Giuffre brought this action, repeating many of the allegations she made in her CVRA joinder motion.

Giuffre has noted that the defamation cause of action against Maxwell did not accrue until Maxwell defamed her in January of 2015.

34. 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.”

35. Giuffre lived independently from her parents with her fiancé long before meeting Epstein or Maxwell. After leaving the Growing Together drug rehabilitation facility in 1999, Giuffre moved in with the family of a fellow patient. There she
met, and became engaged to, her friend's brother, James Michael Austrich ("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 Giuffre'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 Giuffre agreed to marry Austrich, she never had any intention of doing so.

Giuffre has denied that she voluntarily lived independently from her parents with her fiancé; she states that she was a troubled minor child who was not realistically engaged prior to meeting Maxwell and Epstein, as she was not of legal age to marry. She confirms she had no intention of marrying Austrich.

Survivors Charter School. Survivor’s Charter School was an alternative school designed to assist students who had been unsuccessful at more traditional schools. Giuffre remained enrolled at Survivor’s Charter School until March 7, 2002. She was present 56 days and absent 13 days during her time there. Giuffre never received her high school diploma or GED. The school day at Survivor’s Charter School lasted from morning until early afternoon.

Giuffre has denied the statement and has noted that Giuffre’s school transcripts indicate “NO COURSES TAKEN” for the 1999-2000 and 2000-2001 school years and that her attempt to work and resume school at Survivor’s Charter School as a 10th grader in the 2001-2002 school year was limited to a portion of the school year, spanning fewer than six months from October 2001 to March 7, 2002. She states that she attempted to get away from Epstein’s abuse and that the records indicate that Giuffre’s attendance was poor, with 69 days present and 32 days absent out of a required 180 day school year. She was not enrolled at the end of the school year. Her presence on flights with Epstein, verified by Epstein’s pilot on flight logs, and an abundance of witness testimony corroborate her story that she was flying domestic and internationally with Epstein at least 32

37. During the year 2000, Giuffre worked numerous jobs. In 2000, while living with her fiancé, Giuffre 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. Giuffre cannot now recall either the Southeast Employee Management Company or the Oasis Outsourcing jobs.

Giuffre has disputed the statement and has noted that while she held various jobs in 2000, Social Security Administration records do not show the exact dates of employment (month and day) because they do not need this information to figure Social Security benefits. She states that neither Southeast Employee Management Company nor Oasis Outsourcing were her employers. She states that she worked at Taco Bell, as well as a pet store, but that neither of these are listed on her Social Security Administration records because they were most likely paid through payroll companies. She subsequently worked at Mar-a-Lago. She also volunteered at Aviculture Breeding and
Research Center, where they eventually put her on the payroll but paid her very little.

38. Giuffre’s employment at The Mar-a-Lago spa began in fall 2000. Giuffre’s father, Sky Roberts ("Roberts"), was hired as a maintenance worker at The Mar-a-Lago Club in Palm Beach, Florida, beginning on April 11, 2000. Roberts worked there year-round for approximately 3 years. After working there for a period of time, Roberts became acquainted with the head of the spa area and recommended Giuffre for a job there. Mar-a-Lago closes every Mother’s Day and reopens on November 1. Most employees at 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. Giuffre 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.

Giuffre has disputed the statement and noted that the Mar-a-Lago Club produced 177 pages of records in response to Maxwell’s subpoena which did not indicate Giuffre’s actual dates of employment, nor whether she was a full-time or seasonal employee. The only significant record produced was a single,
vague chart entry indicating that Giuffre was terminated in 2000 and that Mar-a-Lago was a summer job.

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

Giuffre has denied the statement and has noted that in Florida, a person cannot work as a masseuse unless she is “at least 18 years of age or has received a high school diploma or high school equivalency diploma,” Fla. Stat. § 480.041. She was a minor child, under the age of 18, when she was working at Mar-a-Lago as a spa attendant and was approached by Maxwell who told her she could make money as a masseuse, a profession in which
Giuffre had no experience. She states that her father drove her to Epstein’s house, the address of which was given to her by Maxwell, that she was led into the house and instructed by Maxwell on how to give a massage. She states that Epstein and Maxwell turned the massage into a sexual encounter, and offered her money and a better life to be compliant in the sexual demands of Maxwell and Epstein. She then began travelling with Maxwell and Epstein on private planes and servicing people sexually for money — working not as a legitimate masseuse, but in a position of sexual servitude. Giuffre further noted that Epstein’s house manager, Alessi, described Maxwell’s methodical routine of how she prepared a list of places ahead of time, then drove to each place for the purpose of recruiting girls to massage Epstein. Alessi stated that on multiple occasions he drove Maxwell to pre-planned places while she recruited girls for massage, and that he witnessed Giuffre at Epstein’s house on the very same day that he witnessed Maxwell recruit Giuffre from Mar-a-Lago. Giuffre further noted Sjoberg’s testimony that she was similarly recruited.

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

Giuffre has objected to the statement as irrelevant and unrelated to the allegations made in Giuffre’s complaint against Maxwell and the alleged information should be excluded by multiple rules of evidence, and has been contested by Giuffre.

41. Giuffre 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, Giuffre and Figueroa hosted a party with a number of guests. During the party, according to Giuffre, someone entered Giuffre’s room and stole $500 from her shirt pocket. Giuffre 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, Giuffre contacted
the police to report that her former landlord had left her belongings by the roadside and had lit her mattress on fire. Again, Giuffre 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.”

Giuffre has objected to the statement as misleading and irrelevant and further noted that she was fearful of Maxwell and Epstein, and, accordingly, she would not have reported her abusers and noted that she knew that Epstein had control over the Palm Beach Police.

42. From August 2001 until September 2002, Epstein and Maxwell were almost entirely absent from Florida on documented travel unaccompanied by Giuffre. Flight logs maintained by Dave Rodgers ("Rodgers"), Epstein’s private pilot, evidence the substantial number of trips away from Florida that Epstein and Maxwell took, unaccompanied by Giuffre, 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 month period from November 2000 to September 2002, Epstein was traveling outside of Florida unaccompanied by Giuffre. During this same period of time, Giuffre was employed at various jobs, enrolled in school, and living with her boyfriend.

Giuffre has disputed this statement and noted the flight logs produced in this matter provide substantive evidence of Giuffre’s travel while in the control of Maxwell and Epstein, but are incomplete as Giuffre also was flown by Maxwell on commercial flights. The flight logs and pilot testimony clearly prove that Giuffre was flying domestic and internationally with Epstein at least 32 times between December 11, 2000 to July 28, 2001 and June 21, 2002 to August 21, 2002. Maxwell has acknowledged the flight logs are incomplete and that there were several pilots and co-pilots that flew Epstein and Maxwell (e.g., Rodgers, Lawrence “Larry” Visoski, Bill Hammond, Pete Rathgeb, Gary Roxburgh, and Bill Murphy) in multiple aircrafts and that only Rodgers produced flight records. Giuffre states that Maxwell has also acknowledged that many of the girls recruited by Maxwell routinely traveled on commercial flights for the purposes of providing massages to Epstein or guests at Epstein’s New York, New Mexico, or U.S. Virgin Island homes.
Giuffre has further noted that her passport application, travel records, and witness testimony demonstrate flight logs are incomplete, that she also flew commercially while she worked for Maxwell and Epstein. Her passport application, for example, listed travel plans to London, and subsequent flight logs listed Giuffre traveling to London with Maxwell, Epstein, and others. Giuffre has cited the evidence she contends establish her travel with Epstein and Maxwell, including massage training in Thailand.

43. Giuffre and Figueroa shared a '93 white Pontiac in 2001 and 2002. Giuffre freely traveled around the Palm Beach area in that vehicle. In August 2002, Giuffre acquired a Dodge Dakota pickup truck from her father. Figueroa used that vehicle in a series of crimes before and after Giuffre left for Thailand.

Giuffre has denied the statement and has noted that she purchased a car from the $10,000 payment she received from Epstein after she was forced to have sex with Prince Andrew in London at Maxwell’s home.
44. Giuffre held a number of jobs in 2001 and 2002. During 2001 and 2002, Giuffre was gainfully employed at several jobs. She worked as a waitress at Mannino’s Restaurant, at TGIFriday’s restaurant ("CCI of Royal Palm Inc."), and at Roadhouse Grill. She also was employed at Courtyard Animal Hospital ("Marc Pinkwasser DVM").

Giuffre has denied the statement and noted that in 2001 and 2002 she attempted to go back to school to earn her GED, and tried unsuccessfually to hold down waitressing jobs. She earned $212.00 as a waitress working “briefly” at Mannino’s Restaurant and, in 2002, earned $403.64 working at the TGIFriday’s restaurant ("CCI of Royal Palm Beach") for a “short time period.” She earned about $1,247.90 at Roadhouse Grill until about March 2002, and at the Courtyard Animal Hospital ("Marc Pinkwasser DVM") she received payroll checks for weeks ending April 22, 2002 to June 4, 2002, earning a total of $1,561.75. Not long after she lost her job at the Courtyard Animal Hospital, she was traveling with Maxwell to the Bahamas, Santa Fe, New Mexico, and New York.

45. Giuffre 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 then 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 Figueroa’s deposition in this matter in May 2016.

Giuffre admitted traveling to Thailand to receive massage training in September 2002 but noted that she was given an assignment from Maxwell and Epstein that she had to recruit another underage girl from Thailand, and bring that young girl back to Epstein. Giuffre stated that she was expected to return to Epstein and Maxwell upon completion of her massage training and assignment, and that instead she escaped to Australia where she remained in hiding from Maxwell and Epstein for several years.

46. Detective Joseph Recarey (“Recarey”) investigated Epstein and failed to uncover any evidence that Maxwell was involved in sexual abuse of minors, sexual trafficking or production or possession of child pornography. Recarey served as the lead detective from the Palm Beach Police Department charged with investigating 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.

Recarey's investigation revealed that not one of the alleged Epstein victims ever mentioned Maxwell's name and she was never considered a suspect by the Government. None of Epstein's alleged victims said they had seen 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 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 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. 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 Maxwell sexually trafficking anybody. Recarey also has no knowledge of Giuffre's conduct that is subject of this lawsuit.

Giuffre has denied the statement and noted that Recarey wanted to speak to Maxwell, but she did not return his calls and he concluded that Maxwell's role was to procure girls for Epstein. Giuffre further noted that in the execution of the search warrant, stationary was found in the home bearing Maxwell's name, and notes were written by house staff to Maxwell and message pads uncovered in trash pulls revealing numerous calls left at the house for Maxwell, indicating she was staying in the house during the days when Epstein was engaging in illegal sex acts with minors. Giuffre further noted that a walk through video taken during the execution of the search warrant revealed photos of topless females at the home, including a photograph of Maxwell naked hanging in the home. Alfredo Rodriguez ("Rodriguez"), the house butler from 2004 through 2005, a time period that included daily sexual abuse of underage females, testified that Maxwell kept a list of the local girls who were giving massages at her desk, and that Maxwell kept nude photos of girls on her computer. Giuffre states that Recarey
testified that when the search warrant was executed, the house had been sanitized and the computers removed from the home.

Giuffre states that the co-conspirator who maintained direct contact with the many underage victims was Kellen, whose sole responsibility was to schedule underage girls to visit Epstein for sex and reported directly to Maxwell. Figueroa testified that Maxwell personally requested that he find and bring girls to Epstein for sex once Giuffre had escaped, and that when he brought the girls Maxwell interacted with them, that Maxwell was "the boss" and that she knew everything that was going on.

47. No nude photograph of Giuffre was displayed in Epstein’s home. Epstein’s housekeeper, Alessi, “never saw any photographs of Virginia Roberts [Giuffre] in Epstein’s house.” 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.

Giuffre has denied this statement and noted that Maxwell had pornography on her computer, that there was a
collage of nude photos in Epstein's closet, that the collage was taken into evidence by Recarey, who testified to that fact in his deposition, that Rizzo, a visitor to the home on numerous occasions, was reprimanded by Maxwell for looking at the nude photos, and that the search warrant revealed photographs of nudity displayed, including a photograph of Maxwell herself in the nude. Sjorberg testified that Maxwell bought her a camera for the specific purpose of her taking nude photos of herself and Giuffre has testified that there was a nude photograph of her at the house.

48. Giuffre 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. Giuffre also kept a "dream journal" regarding her thoughts and memories that she possessed in January 2016. To date, Giuffre cannot locate the "dream journal."

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

Giuffre has denied this statement in part and admitted it in part, noting that in 2011, Giuffre was still in hiding from Epstein and Maxwell in Australia and not looking to sell anything or even speak with anyone about what had happened to her. Churcher located Giuffre and impressed the importance of Giuffre standing up to those who had harmed her and speaking with federal authorities. Giuffre did so in 2011, bringing the abuse of Maxwell and Epstein to public light to prevent their continued abuse of others. Giuffre agreed to be interviewed by Churcher and was compensated for sharing her story, which came at the heavy price of being publicly scrutinized.

50. Giuffre drafted a 144-page purportedly autobiographical book manuscript in 2011 which she actively sought to publish. In 2011, contemporaneous with her Churcher interviews, Giuffre drafted a book manuscript which purported to
document Giuffre’s experiences as a teenager in Florida, including her interactions with Epstein and Maxwell. Giuffre 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.

Giuffre has denied the statement in part and admitted it in part, stating that she received a Victim Notification Letter from the United States Attorney’s office for the Southern District of Florida regarding her sexual victimization by Epstein, that in 2011 she sought psychological counseling from a psychologist for the trauma she endured, and that also that year Churcher sought her out and interviewed her. Giuffre was interviewed by the FBI in 2011. Giuffre has noted that she began to draft a fictionalized account of what happened to her as an act of empowerment and a way of reframing and taking control over the narrative of her past abuse that haunts her and, while she explored trying to publish her story to empower other individuals who were subject to abuse, she ultimately decided not to publish it.
51. The CVRA joinder motion filed by Giuffre generated a media maelstrom and spawned highly publicized litigation between Giuffre’s lawyers—Bradley Edwards ("Edwards") and Paul Cassell ("Cassell")—and Dershowitz. After Giuffre publicly accused Dershowitz of sexual misconduct, Dershowitz vigorously defended himself in the media. He called Giuffre a liar and accused her lawyers of unethical conduct. In response, Edwards and Cassell sued Dershowitz, who counterclaimed. This litigation, in turn, caused additional media attention by national and international media organization.

Giuffre has denied the statement as set forth in Statement 7.

52. Giuffre formed non-profit Victims Refuse Silence to attract publicity and speak out on a public controversy. In 2014, Giuffre, with the assistance of the same counsel, formed a non-profit organization, Victims Refuse Silence. According to Giuffre, the purpose of the organization is to promote Giuffre’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. Giuffre attempts to promote Victims Refuse Silence at every opportunity. For example, Giuffre participated in an interview in New York with ABC to promote the charity and to get her mission out to the public.

Giuffre has denied that she formed the non-profit Victims Refuse Silence to “speak out on a public controversy,” and noted she sought to help survivors of sexual abuse and sexual trafficking and in order to provide assistance to victims, she attempted to talk about the non-profit’s mission when she had the opportunity to do so.

III. The Applicable Standard

Summary judgment is appropriate only 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). “[T]he substantive law will identify which facts are material.” Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986).

A dispute is “genuine” if “the evidence is such that a reasonable jury could return a verdict for the nonmoving party.”
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." Id. at 251-52. A court is not charged with weighing the evidence and determining its truth, but with determining whether there is a genuine issue for trial. Westinghouse Elec. Corp. v. N.Y. City Transit Auth., 735 F. Supp. 1205, 1212 (S.D.N.Y. 1990) (quoting Anderson, 477 U.S. at 249). "[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." Anderson, 477 U.S. at 247-48 (emphasis in original).

While the moving party bears the initial burden of showing that no genuine issue of material fact exists, Atl. Mut. Ins. Co. v. CSX Lines, L.L.C., 432 F.3d 428, 433 (2d Cir. 2005), in cases where the non-moving party bears the burden of persuasion at trial, "the burden on the moving party may be discharged by ‘showing’—that is, pointing out to the district court—that there is an absence of evidence to support the nonmoving party’s case." Celotex Corp. v. Catrett, 477 U.S. 317, 325 (1986). "It is ordinarily sufficient for the movant to point
to a lack of evidence . . . on an essential element of the non-movant’s claim . . . . [T]he nonmoving party must [then] come forward with admissible evidence sufficient to raise a genuine issue of fact for trial . . . .” Jaramillo v. Weyerhaeuser Co., 536 F.3d 140, 145 (2d Cir. 2008) (internal citations omitted); see also Goenaga v. March of Dimes Birth Defects Found., 51 F.3d 14, 18 (2d Cir. 1995) (“Once the moving party has made a properly supported showing sufficient to suggest the absence of any genuine issue as to a material fact, the nonmoving party ... must come forward with evidence that would be sufficient to support a jury verdict in his favor”).

IV. The Motion for Summary Judgment on Republication Grounds is Denied

Maxwell has moved for summary judgment dismissing Giuffre’s complaint on the grounds that Maxwell is not liable for the republication of her Press Release by the media. Because as a matter of law the issuer of a press release is responsible for its publication, the motion is denied.

In New York, 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); see also Hoffman v. Landers, 146 A.D.2d 744, 747 (N.Y. App. Div. 2d Dep’t 1989) ("One who makes a defamatory statement is not responsible for its recommunication without his authority or request by another over whom he has no control."). Where 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." Davis, 580 F. Supp. at 1096 (internal quotation marks and citation omitted). The New York Court of Appeals summarized New York’s republication liability standard in Geraci v. Probst, 938 N.E.2d 917 (N.Y. 2010), stating 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 quotation marks and citation omitted). Thus, "conclusive evidence of lack of actual authority [is] sufficiently dispositive that the [court] 'ha[s] no option but to dismiss the case . . . .'" Davis, 580 F. Supp. at 1096

However, New York law assigns liability to individuals for the media's publication of press releases. New York appellate courts have held that an individual is liable for the media publishing that individual's defamatory press release. See *Levy v. Smith*, 132 A.D.3d 961, 962-63 (N.Y. App. Div. 2d Dep't 2015) ("Generally, [o]ne who makes a defamatory statement is not responsible for its recommunication without his authority or request by another over whom he has no control . . . . Here, however, . . . the appellant intended and authorized the republication of the allegedly defamatory content of the press releases in the news articles."); see also *RESTATEMENT (SECOND) OF TORTS* § 576 (1977) ("The publication of a libel or slander is a legal cause of any special harm resulting from its repetition by a third person if . . . the repetition was authorized or intended by the original defamer, or . . . the repetition was reasonably to be expected.")

The facts as set forth above establish that Maxwell approved the Press Release. The Press Release was sent to between six and 30 media representatives by Gow as an employee
of Acuity Reputation, the public relations firm hired by Maxwell. The initial sentence of the Press Release - "Please find attached a quotable statement on behalf of Maxwell" - communicates Maxwell's authorization for the media recipients of the Press Release to publish it. See Nat'l Puerto Rican Day Parade, Inc. v. Casa Pubs., Inc., 79 A.D.3d 592, 595 (N.Y. App. Div. 1st Dep't 2010) (affirming the refusal to dismiss defamation counts against a defendant who "submitted an open letter that was published in [a] newspaper, and that [the defendant] paid to have the open letter published," finding that the defendant "authorized [the newspaper] to recommunicate his statements.").

Maxwell has cited Geraci v. Probst in support of her position, but Geraci is distinguishable from the instant action. In Geraci, the defendant sent a letter to the Board of Fire Commissioners, and, more than three years later, a newspaper published the letter. The court held that the defendant was not liable for that belated publication, "made years later without his knowledge or participation." 938 N.E.2d at 919. Here, unlike in Geraci, the Press Release was not published "without [her] authority or request," but rather with Maxwell's authority and
by her express request. Gom’s testimony establishes Maxwell’s authority and control over the Press Release:

Q. When you sent that email were you acting pursuant to Ms. Maxwell’s retention of your services?

A. Yes, I was

***

Q. The subject line does have “FW” which to me indicates it’s a forward. Do you know where the rest of this email chain is?

A. My understanding of this is: It was a holiday in the UK, but Mr. Barden was not necessarily accessible at some point in time, so this had been sent to him originally by Ms. Maxwell, and because he was unavailable, she forwarded it to me for immediate action. I therefore respond, “Okay, Ghislaine, I’ll go with this.”

It is my understanding that this is the agreed statement because the subject of the second one is “Urgent, this is the statement” so I take that as an instruction to send it out, as a positive command: “This is the statement.”

Maxwell also cites Davis v. Costa-Gavras, involving a libel claim against an author who wrote a book about a military coup in Chile. 580 F. Supp. at 1085. Years after the author published the book, a third-party publishing house republished the book in paperback form and a third-party filmmaker released a movie based on the book. The book author did not actually participate in the republications, though he was aware of the
projects. The court held that the author of the book could not be held liable for the republications, explaining that a "party who is 'innocent of all complicity' in the publication of a libel cannot be held accountable." 580 F. Supp. at 1094 (internal citations omitted). The court further noted that "active participation in implementing the republication resurrects the liability." Id. Likewise, in Karaduman v. Newsday, Inc., 416 N.E.2d 557 (1980), also cited by Maxwell, the court held that reporters of a series of articles on narcotics trade "cannot be held personally liable for injuries arising from [the] subsequent republication in book form absent a showing that they approved or participated in some other manner in the activities of the third-party republisher." Id. at 559-560. However, the court explicitly noted that this result was required because "the record [was] barren of any concrete evidence of the reporters' involvement in the republication of the newspaper series." Id. at 540.

Here, there is evidence in the record that Maxwell "actively participated" in influencing the media to publish the Press Release, Davis, 580 F. Supp. at 1094, and "approved" of and sought the publication of the press release, Karaduman, 416 N.E.2d at 560. Maxwell retained a public relations media
specialist. The Press Release was sent by Maxwell’s express request. Gow’s testimony about the process leading up to the dissemination of the Press Release indicates that Maxwell did, indeed, “authorize or intend” for the media recipients to publish the statement. Because there are sufficient facts to demonstrate Maxwell’s authority and control over the publication of the Press Release, Maxwell’s liability for the Press Release’s publication survives the motion for summary judgment.

Maxwell has additionally asserted that subjecting her to liability for republication is “particularly unfair” because excerpts of the Press Release, rather than the whole statement, were published. Def.’s Reply at 9. Maxwell cites to Rand v. New York Times Co., 75 A.D.2d 417 (N.Y. App. Div. 1st Dep’t 1980), in which a newspaper paraphrased the defendant’s opinion, essentially “excis[ing] the opinion from the context in which it was given.” Id. at 424. No similar alteration, sanitization, hyperbolizing, or paraphrasing of Maxwell’s statements has been established here. Nor does the record establish that any statements of Maxwell’s were taken out of context; rather, they were directly quoted, accurately and unchanged. The publication of Maxwell’s statement that Giuffre’s claims are “obvious lies”
does not distort or misrepresent the message Maxwell intended to convey to the public with the Press Release.

Because the purpose of the issuance of the Press Release was publication, Maxwell is liable for its content and the motion for summary judgment on the grounds of non-liability for republication is denied.

V. The Motion for Summary Judgment to Dismiss the Defamation Claim on the Ground of Substantial Truth is Denied

Maxwell has asserted that the Press Release is substantially true and that the defamation claim should therefore be dismissed. See Def.'s Br. at 39. Whether or not Giuffre lied about Maxwell’s involvement in the events that Giuffre has alleged took place is the intensely contested factual issue that is the foundation of this action.
Accordingly, summary judgment is not appropriate. See Mitre Sports Intern. Ltd. v. Home Box Office, Inc., 22 F. Supp. 3d 240, 255 (S.D.N.Y. 2014) (denying summary judgment because it would require the Court to decide disputed facts to determine whether the statement at issue was substantially true); Da Silva v. Time Inc., 908 F. Supp. 184, 187 (S.D.N.Y. 1995) (denying motion for summary judgment because there was a genuine issue of
material fact as to whether defamatory photo and caption were true).

Under New York law, "truth is an absolute, unqualified defense to a civil defamation action" and "'substantial truth' suffices to defeat a charge of libel." Jewell v. NYP Holdings, Inc., 23 F. Supp. 2d 348, 366 (S.D.N.Y. 1998) (internal quotation marks and citations omitted). 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." Id. (quoting Fleckenstein v. Friedman, 193 N.E. 537, 538 (N.Y. 1934)). Thus, "it is not necessary to demonstrate complete accuracy to defeat a charge of libel. It is only necessary that the gist or substance of the challenged statements be true." Printers II, Inc. v. Professionals Publishing, Inc., 784 F.2d 141, 146 (2d Cir. 1986); see also Korkala v. W.W. Norton & Co., 618 F.Supp. 152, 155 (S.D.N.Y. 1985) ("Slight inaccuracies of expression are immaterial provided that the defamatory charge is true in substance.") (internal quotation marks and citation omitted); Sharon v. Time, Inc., 609 F.Supp. 1291, 1294 (S.D.N.Y. 1984) ("Defendant is permitted to prove the substantial truth of this statement by establishing any other proposition that has the
same 'gist' or 'sting' as the original libel, that is, the same effect on the mind of the reader.”).

The Honorable Loretta A. Preska has noted that cases addressing whether a statement is substantially true “fall along a broad spectrum.” Jewell, 23 F. Supp. at 367. There are cases in which a statement is non-actionable because it is completely true. See, e.g., Carter, 233 A.D.2d 473, 474 (N.Y. App. Div. 2d Dep’t 1996) (claim that defendant committed libel by informing the authorities that plaintiff was endorsing checks made payable to the defendant and depositing them in plaintiff’s account held non-actionable where plaintiff had in fact endorsed checks made payable to the defendant). There are cases where “one struggles to identify any area of ambiguity as to truth.” Jewell, 23 F. Supp. at 368; see, e.g., Miller v. Journal-News, 211 A.D.2d 626, 627 (N.Y. App. Div. 2d Dep’t 1995) (statement that plaintiff was “suspended” substantially true where plaintiff was placed on “administrative leave”). There are cases where the line between the statement and the admitted truth is more tenuous, but the overall “gist” cannot be said to be substantially different. See, e.g., Guccione v. Hustler Magazine, Inc., 800 F.2d 298, 302-03 (2d Cir. 1986) (holding that statement which implied that plaintiff was then currently an adulterer was substantially true.
where plaintiff had ceased being an adulterer but had
"unabashedly committed adultery" for thirteen of seventeen
years). Finally, there are "those cases in which a defendant
simply asks too much in asserting that a statement is
substantially true because the difference between the two is
plainly substantial." Jewell, 23 F. Supp. at 368. For example,
the court in Da Silva, 908 F. Supp. at 186-87, held that a
photograph of plaintiff which identified her as a prostitute was
not substantially true where the plaintiff had been a prostitute
for some six years but was not at the time of publication.

After reviewing this spectrum of cases, the facts upon
which Maxwell bases her argument are insufficient to allow this
Court to find substantial truth as a matter of law. A material
dispute of fact exists as to the "admitted truth" or the
"reality" in this case. Maxwell has cited to various facts to
counter Giuffre's claims, such as Giuffre's high school
enrollment, short-term jobs, and lack of record on private
flight logs during some of the relevant time period, as evidence
that Maxwell and Epstein did not abuse Giuffre. The details and
significance of the facts offered are highly contested, and
therefore cannot establish the "substantial truth" of the Press
Release. "[R]easonable jurors could conclude that the statements

The motion for summary judgment to dismiss the defamation on the ground of substantial truth is denied as not having been established by undisputed material facts.

VI. The Defamation Claim is Not Barred by New York Law

Maxwell has moved to dismiss the complaint on the ground that the Press Release is opinion and protected by the pre-litigation privilege under New York law. Because New York law does not support Maxwell’s position, the motion for summary judgment based on the characterization of the Press Release as opinion and as protected by a pre-litigation privilege is denied.

1. The Press Release is Not Opinion.

As previously held, Maxwell’s statement that Giuffre’s claims of sexual assault are lies is not an expression of opinion:
First, statements that Giuffre’s claims ‘against [Maxwell] are untrue,’ have been ‘shown to be untrue,’ and are ‘obvious lies’ have a specific and readily understood factual meaning: that Giuffre is not telling the truth about her history of sexual abuse and [Maxwell]’s role, and that some verifiable investigation has occurred and come to a definitive conclusion proving that fact. Second, these statements (as they themselves allege), are capable of being proven true or false, and therefore constitute actionable fact and not opinion. Third, in their full context, while [Maxwell]’s statements have the effect of generally denying Giuffre’s story, they also clearly constitute fact to the reader.


This Court further concluded that

[Giuffre] cannot be making claims shown to be untrue that are obvious lies without being a liar. Furthermore, to suggest an individual is not telling the truth about her history of having been sexually assaulted as a minor constitutes more than a general denial, it alleges something deeply disturbing about the character of an individual willing to be publicly dishonest about such a reprehensible crime. [Maxwell]’s statements clearly imply that the denials are based on facts separate and contradictory to those that [Giuffre] has alleged.

Id.

Maxwell argues that the “context” of the entire statement “tested against the understanding of the average reader” should be that of a press release as a whole being read only by journalists. Def.’s Br. at 22 (quoting Aronson v. Wiersma, 483 N.E.2d 1138, 1139 (1985)). However, the ultimate
audience for a press release is the public. The motion to dismiss opinion clearly addressed this issue:

Sexual assault of a minor is a clear-cut issue; either transgression occurred or it did not. Either Maxwell was involved or she was not. The issue is not a matter of opinion, and there cannot be differing understandings of the same facts that justify diametrically opposed opinion as to whether Maxwell was involved in Giuffre’s abuse as Giuffre has claimed. Either Giuffre is telling the truth about her story and Maxwell’s involvement, or Maxwell is telling the truth and she was not involved in the trafficking and ultimate abuse of Giuffre.

Giuffre, 165 F. Supp. at 152.

Maxwell has urged that these conclusions at the motion to dismiss stage should be revisited and revised when considering the summary judgment motion since the standard for deciding a Rule 12(b)(6) motion is different from the standard for deciding a Rule 56 motion. 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 149 (internal quotation marks and citation omitted). In contrast, for a Rule 56 motion, the plaintiff defending the motion may not “rest on [the] allegations” in her complaint. Anderson, 477 U.S. at 249.
In deciding its motion to dismiss opinion, the Court relied on *Davis v. Boeheim*, 22 N.E.3d 999 (2014), and held that the three allegedly defamatory statements in the Press Release have a specific and readily understood factual meaning, are capable of being proven true or false, and "clearly constitute fact to the reader." *Giuffre*, 165 F. Supp. at 152. The Court determined that "[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." *Id.* at 151 (internal quotation marks and citation omitted). To answer that inquiry, three factors enumerated in *Davis* were applied. See *id.* These three factors are the same as the four factors in *Immuno AG v. Moor-Jankowski*, 567 N.E.2d 1270 (N.Y. 1991); 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. "[T]he critical aspect of the inquiry, as articulated in the third factor set forth above, is to view the statements in context." *Jewell*, 23 F. Supp. 2d at 377. This contextual analysis "proceeds on two levels, the ‘broader social setting’ of the statements, as well as their ‘immediate context.’" *Id.* (citing *Immuno*, 567 N.E.2d at 1280).
Maxwell acknowledges that the Court properly applied Davis at the motion to dismiss stage, but argues that the third factor, especially, benefits from the evidence presented in the motion for summary judgment. See Def.’s Br. at 32. In other words, Maxwell argues that “the Court did not have the ‘full context’” of the Press Release or the “broader social context and surrounding circumstances of the statement.” Id. At the motion to dismiss stage, the text of the Press Release had not yet been produced, nor had there been production of emails or deposition testimony regarding the Press Release.

The developed record necessitates the same conclusion as at the motion to dismiss stage. The context and surrounding circumstances remain the same. The publication was intended by Maxwell to reach the average reader, not simply the reporters, Barden’s intent, a factual issue in contest, notwithstanding. The issue of truth or falsity is a factual determination, not a matter of opinion. See Giuffre, 165 F. Supp. 3d at 152 ("[S]tатеmеnts thаt Giуffrе’ѕ clаimѕ ‘аgаinst [Махwеll] аrе untrue,’ hаvе bееn ‘shоwn tо bе untrue,’ аnd аrе ‘оbviоus lіеѕ’ hаvе а sресіfіс аnd rеаdіlу uNDERSTооD fасtUаl mеаnіng.").
2. The Pre-Litigation Privilege is Inapplicable.

Maxwell has contended that the pre-litigation privilege as enunciated in *Front, Inc. v. Khalil*, 28 N.E.3d 15, 16 (N.Y. 2015), applies. See Def.’s Br. at 33.

"A privileged communication is one which, but for the occasion on which it is uttered, would be defamatory and actionable." *Park Knoll Assocs. v. Schmidt*, 451 N.E.2d 182, 184 (N.Y. 1983). "[I]t is well-settled that statements made in the course of litigation are entitled to absolute privilege." *Front*, 28 N.E.3d at 18. The privilege that protects statements made in the course of litigation "can extend to preliminary or investigative stages of the process, particularly where compelling public interests are at stake." *Rosenberg v. MetLife, Inc.*, 866 N.E.3d 439, 443 (N.Y. 2007). In *Front*, the New York Court of Appeals ruled that the privilege for "statements made by attorneys prior to the commencement of litigation" is qualified rather than absolute. Id. at 16. Specifically, the Court held that an attorney’s statements made before litigation has commenced are privileged if (1) the attorney has "a good faith basis to anticipate litigation" and (2) the statements are "pertinent to that anticipated litigation." Id. at 20.
The anticipated litigation, according to the Press Release, was "redress at the repetition of such old defamatory claims." See Press Release. According to Barden, Maxwell's lawyer, he participated in the preparation of the Press Release, the purpose of the Press Release was to dissuade the media from publishing Giuffre's allegations, and the implication of the Press Release was that any redress sought by Maxwell would be against the media. Giuffre has disputed Barden's claim that the Press Release was his own statement.

Certain of the cases cited by Maxwell in support of the privilege can be distinguished, according to Giuffre, in that they involve communications to or from parties to the ultimate litigation. See, e.g., Kirk v. Heppt, 532 F. Supp. 2d 586, 593 (S.D.N.Y. 2008) (the communication at issue was made by an attorney's client to the attorney's malpractice carrier concerning the client's justiciable controversy against the attorney over which the clients actually sued); Black v. Green Harbour Homeowners' Ass'n, Inc., 19 A.D.3d 962, 963 (N.Y. App. Div. 3d Dep't 2005) (privilege applied to a letter sent by a home owner's association board of directors to the association's members informing them of the status of litigation to which the
association was a party). Giuffre contends that "there was no statement made by anyone before the commencement of litigation because litigation never commenced." See Pl.'s Opp'n at 42.

Here, the communication at issue was sent to members of the media, and no litigation took place between Maxwell and the media recipients of the Press Release.

However, the pre-litigation privilege is not limited to statements between parties and their lawyers. "While the communications at issue in Front were among lawyers and potential parties, the New York Court of Appeals did not explicitly require the recipient of the challenged statements to be a lawyer or potential party." Feist v. Paxfire, Inc., No. 11 CIV. 5436 (LGS), 2017 WL 177652, at *5 (S.D.N.Y. Jan. 17, 2017); see Front, 28 N.E.3d at 16-17. The Second Circuit "summarily rejected this interpretation when it applied Front to an attorney's communications to the press." See Tacopina v. O'Keefe, 645 F. App'x 7, 8 (2d Cir. 2016) ("Even crediting [the plaintiff]'s allegation that [the attorney] shared the affidavit with the Daily News before filing it in court, Tacopina has still not sustained his burden of showing that the statements were not pertinent to a good faith anticipated litigation.").
Though a statement made to a non-party may be privileged, the pre-litigation privilege does not apply here because the Press Release cannot be considered a "statement[] made by [an] attorney." Front, 28 N.E.3d at 16. Whether Maxwell's attorney, Barden, had a hand in drafting the Press Release, and the extent to which he may have been involved, is a disputed issue of fact. The record evidence establishes that, regardless, the Press Release is properly attributable to Maxwell. Maxwell retained a public relations firm and sent her representative there, Gow, a forwarded email with the statements that were to be used in the Press Release. Maxwell instructed Gow to send it, as he testified in his deposition. While Maxwell herself did not disseminate the email to the media recipients, neither did Barden. The statement was sent out by Gow.

Additionally, the alleged defamatory statements in the Press Release were attributed to Maxwell, and not to her attorney or his agents. The email stated that the Press Release was a "statement on behalf of" Maxwell and notified the media recipients that "[n]o further communication will be provided by her [Maxwell] on this matter." There is no evidence in the email
that the Press Release was anything near an attorney’s statement; Barden was not even copied on the email.

The pre-litigation privilege is intended to protect attorneys from defamations claims "so that those discharging a public function may speak freely to zealously represent their clients without fear of reprisal or financial hazard." Id. at 18. Where the statement cannot be attributed to an attorney, there is no justification for protecting it by privilege.

In addition, as this Court concluded in denying Maxwell’s motion to dismiss, “[t]here is no qualified privilege under New York law when such statements are spoken with malice, knowledge of their falsity, or reckless disregard for their truth.” Giuffre, 165 F. Supp. 3d at 155 (internal quotation marks and citation omitted). It is Giuffre’s contention that Maxwell knew the statements were false because she engaged in and facilitated the sexual abuse of Giuffre. Therefore, according to Giuffre, they were not made in good faith anticipation of litigation, and instead were made for the inappropriate purpose of “bully[ing],” “harass[ment],” and “intimid[ation].” See Front, 28 N.E.3d at 19 (2015). According to Giuffre, there is ample record evidence that Maxwell acted
with malice in issuing the Press Release, thereby making the
pre-litigation privilege inapplicable.

Because of the existence of triable issues of material
fact rather than opinion and because the pre-litigation
privilege is inapplicable, the motion for summary judgment is
denied.
VII. Conclusion

For the reasons set forth above, the motion for summary judgment is denied.

The parties are directed to jointly file a proposed redacted version of this Opinion consistent with the Protective Order or notify the Court that none are necessary within one week of the date of receipt of this Opinion.

It is so ordered.

New York, NY
March 27, 2017

ROBERT W. SWEET
U.S.D.J.