

# EXHIBIT 22

## (Filed Under Seal)



**United States District Court  
For The Southern District of New York**

*Giuffre v. Maxwell*  
15-cv-07433-RWS

**Ghislaine Maxwell's Privilege Log Amended as of August 1, 2016**

\*\*\*Per Local Rule 26.2, the following privileges are asserted pursuant to British law, Colorado law and NY law.

Log ID	DATE	DOC. TYPE	BATES #	FROM	TO	CC	RELATIONSHIP OF PARTIES	SUBJECT MATTER
1.	2011.03.15	E-Mails	1000-1013	Ghislaine Maxwell	Brett Jaffe, Esq.		Attorney / Client	Communication re: legal advice
2.	2011.03.15	E-Mails	1014-1019	Brett Jaffe, Esq.	Ghislaine Maxwell		Attorney / Client	Communication re: legal advice
3.	2015.01.02	E-Mails	1020-1026	Ross Gow	Ghislaine Maxwell		Attorney Agent / Client	Communication re: legal advice
4.	2015.01.02	E-Mail	1024-1026	Ghislaine Maxwell	Ross Gow		Attorney Agent / Client	Communication re: legal advice
5.	2015.01.02	E-Mail	1027-1028	Ross Gow	Ghislaine Maxwell	Brian Basham	Attorney Agent / Client	Communication re: legal advice
6.	2015.01.06	E-Mail	1029	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication re: legal advice
7.	2015.01.06	E-Mail	1030-1043	Ghislaine Maxwell	Jeffrey Epstein, Alan Dershowitz, Esq.		Attorney / Client	Communication re: legal advice
8.	2015.01.10	E-Mail	1044	Ghislaine Maxwell	Philip Barden, Esq., Ross Gow		Attorney / Client	Communication re: legal advice
9.	2015.01.10	E-Mail	1045-1051	Ghislaine Maxwell	Philip Barden, Esq.		Client / Attorney	Communication re: legal advice
10.	2015.01.09 - 2015.01.10	E-Mails	1052-1055	Ross Gow	Philip Barden, Esq.	G. Maxwell	Agent / Attorney / Client	Communication re: legal advice
11.	2015.01.11	E-Mail	1055-1058	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication re: legal advice
12.	2015.01.11	E-Mail	1055-1058	Philip Barden, Esq.	Ross Gow	G. Maxwell	Attorney / Agent / Client	Communication re: legal advice
13.	2015.01.11	E-Mail	1056-1058	Philip Barden, Esq.	Ghislaine Maxwell	Ross Gow	Attorney / Agent / Client	Communication re: legal advice

14.	2015.01.11 - 2015.01.17	E-Mails	1059- 1083	Jeffrey Epstein	Ghislaine Maxwell		Common Interest	Communication re: legal advice
15.	2015.01.13	E-Mail	1067- 1073	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication re: legal advice
16.	2015.01.13	E-Mail	1069- 1073, 1076- 1079	Philip Barden, Esq.	Martin Weinberg, Esq.		Common Interest	Communication re: legal advice
17.	2015.01.13	E-Mails	1068- 1069, 1074- 1076	Philip Barden, Esq.	Ghislaine Maxwell	Mark Cohen	Attorney / Client	Communication re: legal advice
18.	2015.01.21	E-Mail	1088- 1090	Ross Gow	Philip Barden, Esq., Ghislaine Maxwell		Agent / Attorney / Client	Communication re: legal advice
19.	2015.01.21 - 2015.01.27	E-Mails	1084- 1098	Jeffrey Epstein	Ghislaine Maxwell		Common Interest	Communication re: legal advice
20.	2015.01.21 - 2015.01.27	E-Mails	1099	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication re: legal advice
21.	2015.04.22	E-mail	7 pages	Jeffrey Epstein	Ghislaine Maxwell		Common Interest	Forwarding message from Martin Weinberg labeled "Attorney Client Privilege" with attachment
22.	Various	E-mails		Agent of Haddon, Morgan & Foreman; Laura Menninger	Agent of Haddon, Morgan & Foreman; Laura Menninger		Agent of attorney and Attorney	Attorney work product
23.	Various	E-mails		Mary Borja; Laura Menninger	Mary Borja; Laura Menninger		Attorney Work Product	Attorney work product
24.	2015.10.21 - 2015.10.22	E-mail chain with attachment		Darren Indyke; Laura Menninger	Darren Indyke; Laura Menninger		Attorneys for parties to Common Interest Agreement	Common Interest Agreement
25.	2015.01.06						Attorney/Client	Document prepared by Ghislaine Maxwell at the direction of Philip Barden

26.	2015.01.23								Attorney/Client	Document prepared by Ghislaine Maxwell at the direction of Philip Barden
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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. Gow*<sup>1</sup>.

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**.

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<sup>1</sup> See, para. 30 and 32, Complaint, VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE 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.

f. 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.

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 contained or referenced the statements made against Ms. Giuffre; however, I did not include these multiple publication dates in calculating unique daily visitors.

i. 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.

j. 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**

15. 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.
- **SimiliarWeb**: 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<sup>2</sup>, 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

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<sup>2</sup> Triangulation (social science) [http://en.wikipedia.org/wiki/Triangulation\\_%28social\\_science%29](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 been searching 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<sup>3</sup>, of Acuity Reputation, acting on behalf of Ms. Maxwell, that was sent on 2 January 2015 at 8:38 pm<sup>4</sup> to, based on the email addresses<sup>5</sup>, people at The Mail Online<sup>6</sup>, The Independent<sup>7</sup>, The Mirror<sup>8</sup>, The Times<sup>9</sup>, and the BBC<sup>10</sup>. 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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<sup>3</sup> GM\_00068 (Gow E-Mail)

<sup>4</sup> I am assuming, based on the location of Mr. Gow's company, Acuity Reputation, that this is date-time stamp for the United Kingdom.

<sup>5</sup> 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.

<sup>6</sup> [https://en.wikipedia.org/wiki/Mail\\_Online](https://en.wikipedia.org/wiki/Mail_Online)

<sup>7</sup> [https://en.wikipedia.org/wiki/The\\_Independent](https://en.wikipedia.org/wiki/The_Independent)

<sup>8</sup> [https://en.wikipedia.org/wiki/Daily\\_Mirror](https://en.wikipedia.org/wiki/Daily_Mirror)

<sup>9</sup> [https://en.wikipedia.org/wiki/The\\_Times](https://en.wikipedia.org/wiki/The_Times)

<sup>10</sup> [https://en.wikipedia.org/wiki/BBC\\_News](https://en.wikipedia.org/wiki/BBC_News)

From: <[ross@acuityreputation.com](mailto:ross@acuityreputation.com)>  
Date: 2 January 2015 at 20:38  
Subject: Ghislaine Maxwell  
To: Rossacuity Gow <[ross@acuityreputation.com](mailto:ross@acuityreputation.com)>  
bcc: [martin.robinson@mailonline.co.uk](mailto:martin.robinson@mailonline.co.uk),  
[P.Peachey@independent.co.uk](mailto:P.Peachey@independent.co.uk),  
[nick.sommerlad@mirror.co.uk](mailto:nick.sommerlad@mirror.co.uk),  
[david.brown@thetimes.co.uk](mailto:david.brown@thetimes.co.uk),  
[nick.alway@bbc.co.uk](mailto:nick.alway@bbc.co.uk),  
[jo-anne.pugh@bbc.co.uk](mailto: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

29. I have been informed that the statements made against Ms. Giuffre were confirmed by Ms. Maxwell in a news article and video<sup>11</sup> aired on 5 January 2015, which I have established by reviewing the video referenced in the news article<sup>12</sup>.

<sup>11</sup> GIUFFRE001120

<sup>12</sup> <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”<sup>13</sup>, 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”<sup>14</sup>, 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.

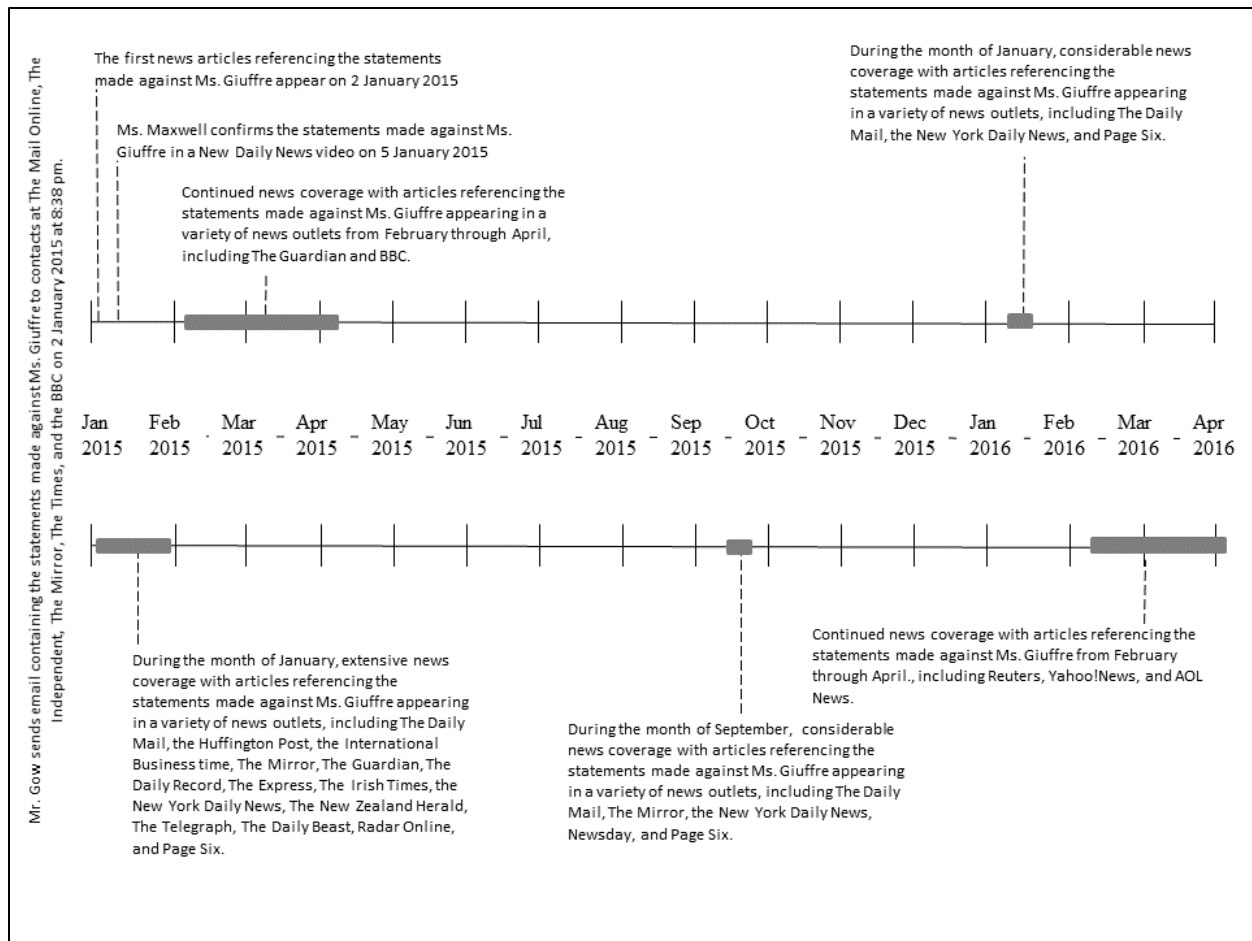
33. A timeline of events relating to the dissemination of the statements made against Ms. Giuffre is shown in Figure 2.

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

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<sup>13</sup> <https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/>

<sup>14</sup> <http://www.mirror.co.uk/news/uk-news/prince-andrews-pal-ghislaine-maxwell-5081971>



35. Concerning the procedure employed in determining the dissemination of the statements made against Ms. Giuffre, nearly every major news site<sup>15</sup> 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.

<sup>15</sup> Including the largest online news sites, such as Yahoo! News, Google News, Huffington Post, CNN, NY Times, Fox News, NBC News, Daily Mail, Washington Post, The Guardian, Wall Street Journal, ABC News, BBC News, USA Today, LA Times (see <http://www.ebizmba.com/articles/news-websites>)

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<sup>16</sup>. 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<sup>17</sup> 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<sup>18</sup>. I employed a modified snowball technique<sup>19</sup>, 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.

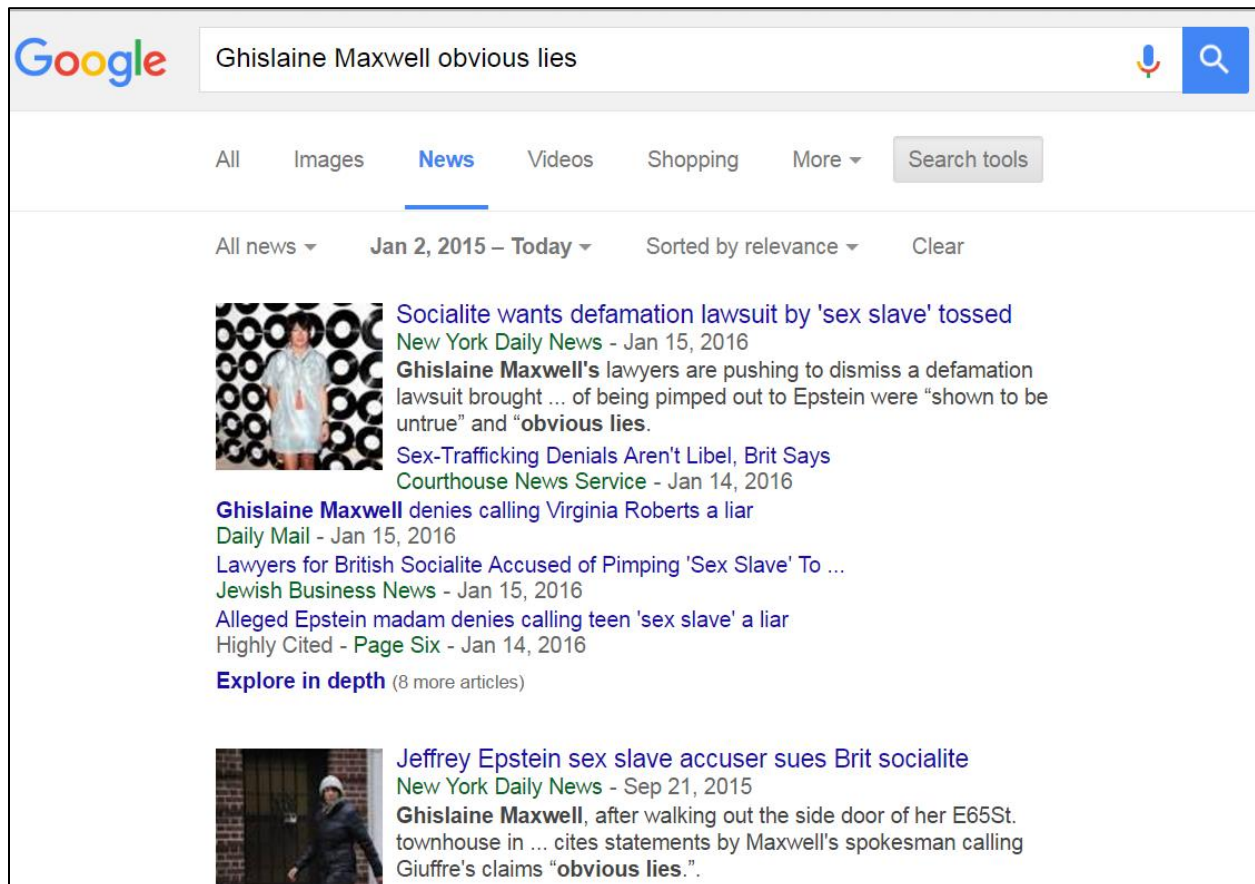
<sup>16</sup> Complaint, VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. CASE NO. 1:15-cv-07433.

<sup>17</sup> *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.*

<sup>18</sup> In addition to the queries, I located some articles via direction navigation.

<sup>19</sup> [https://en.wikipedia.org/wiki/Snowball\\_sampling](https://en.wikipedia.org/wiki/Snowball_sampling)

41. **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<sup>20</sup> of the top 15 online media sites worldwide<sup>21</sup> of articles related to the case, and I reviewed the results to identify if any of these

<sup>20</sup> [https://www.google.com/advanced\\_search](https://www.google.com/advanced_search)

<sup>21</sup> Yahoo! News, Google News, Huffington Post, CNN, NY Times, Fox News, NBC News, Daily Mail, Washington Post, The Guardian, Wall Street Journal, ABC News, BBC News, USA Today, LA Times (see <http://www.ebizmba.com/articles/news-websites>)



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://dukefmfargo.com>
- <http://home.bt.com>
- <http://jewishbusinessnews.com>
- <http://jewishnews.timesofisrael.com>
- <http://kdal610.com>
- <http://kfgo.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.govtislaves.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.nigeriadailynews.news>
- <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.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<sup>22</sup>. 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

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<sup>22</sup> <http://digitalmeasurement.nielsen.com/files/metrics-guidelines.pdf>

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 report<sup>23</sup>.**

No.	Domain	Domain Unique Visitor Traffic (Daily)	Number of Articles Published
1	<a href="http://beforeitsnews.com">http://beforeitsnews.com</a>	193,333	1
2	<a href="http://boltonbnp.blogspot.com">http://boltonbnp.blogspot.com</a> <sup>a</sup>	-	1
3	<a href="http://businessnewsusa.org">http://businessnewsusa.org</a> <sup>a</sup>	-	1
4	<a href="http://dukefmduluth.com">http://dukefmduluth.com</a> <sup>a</sup>	-	1
5	<a href="http://dukefinfargo.com">http://dukefinfargo.com</a> <sup>a</sup>	-	1
6	<a href="http://home.bt.com">http://home.bt.com</a>	800,000	1
7	<a href="http://jewishbusinessnews.com">http://jewishbusinessnews.com</a>	5,000	2
8	<a href="http://jewishnews.timesofisrael.com">http://jewishnews.timesofisrael.com</a> <sup>a</sup>	-	1
9	<a href="http://kdal610.com">http://kdal610.com</a>	257	1
10	<a href="http://kfgo.com">http://kfgo.com</a>	1,600	1
11	<a href="http://motivatornews.com">http://motivatornews.com</a> <sup>a</sup>	-	1
12	<a href="http://mrharrywales.tumblr.com">http://mrharrywales.tumblr.com</a> <sup>a</sup>	-	1
13	<a href="http://muhammad-ali-ben-marcus.blogspot.com">http://muhammad-ali-ben-marcus.blogspot.com</a> <sup>a</sup>	-	1
14	<a href="http://news.sky.com">http://news.sky.com</a>	523,333	2
15	<a href="http://news.trust.org">http://news.trust.org</a> <sup>a</sup>	-	1
16	<a href="http://newsbite.it">http://newsbite.it</a> <sup>a</sup>	-	1
17	<a href="http://newstoday.club">http://newstoday.club</a> <sup>a</sup>	-	1
18	<a href="http://normanfinkelstein.com">http://normanfinkelstein.com</a>	1,987	1
19	<a href="http://onewayempire.com">http://onewayempire.com</a> <sup>a</sup>	-	1
20	<a href="http://pagesix.com">http://pagesix.com</a>	320,000	5
21	<a href="http://planetinvestigations.com">http://planetinvestigations.com</a> <sup>a</sup>	-	1
22	<a href="http://softwaresuites.ne">http://softwaresuites.ne</a> <sup>a</sup>	-	1
23	<a href="http://thisviral.com">http://thisviral.com</a> <sup>a</sup>	-	1
24	<a href="http://townhall.com">http://townhall.com</a>	236,667	1
25	<a href="http://ugandansatheart.blogspot.com">http://ugandansatheart.blogspot.com</a> <sup>a</sup>	-	1
26	<a href="http://uk.reuters.com">http://uk.reuters.com</a>	153,333	1
27	<a href="http://whatiswrongwiththispicture2012.blogspot.com">http://whatiswrongwiththispicture2012.blogspot.com</a> <sup>a</sup>	-	1

<sup>23</sup> Note: Some outlets, I was able to get self-reported visitor numbers, such as the <https://www.theguardian.com>.

No.	Domain	Domain Unique Visitor Traffic (Daily)	Number of Articles Published
28	http://whbl.com	12,252	1
29	http://whtc.com	1,207	1
30	http://wibqam.com <sup>a</sup>	-	1
31	http://wifc.com	990	1
32	http://wincountry.com	503	1
33	http://wkzo.com	573	1
34	http://worlddailynews.info <sup>a</sup>	-	1
35	http://wsau.com	2,653	1
36	http://wtaq.com <sup>a</sup>	-	1
37	http://wtvbam.com <sup>a</sup>	-	1
38	http://www.anorak.co.uk	7,150	1
39	http://www.aol.co.uk	423,333	2
40	http://www.asianimage.co.uk	1,293	1
41	http://www.bailiwickexpress.com	29,633	1
42	http://www.bannednews.net <sup>a</sup>	-	1
43	http://www.bbc.com	12,950,000	1
44	http://www.belfasttelegraph.co.uk <sup>a</sup>	-	1
45	http://www.bournemouthecho.co.uk <sup>a</sup>	-	1
46	http://www.businessinsider.com	3,866,667	1
47	http://www.business-standard.com <sup>a</sup>	-	1
48	http://www.capitalbay.news <sup>a</sup>	-	1
49	http://www.clactonandfrintongazette.co.uk	-	1
50	http://www.courthousenews.com	11,333	3
51	http://www.dailylife.com.au	80,000	1
52	http://www.dailymail.co.uk	14,276,667	6
53	http://www.dailyrecord.co.uk	145,048	3
54	http://www.darkpolitricks.com <sup>a</sup>	-	1
55	http://www.dudleynews.co.uk <sup>a</sup>	-	1
56	http://www.eveningtimes.co.uk	3,667	1
57	http://www.express.co.uk	1,686,667	1
58	http://www.faceiraq.com <sup>a</sup>	-	1
59	http://www.ghanagrio.com <sup>a</sup>	-	4
60	http://www.ghanareview.com <sup>a</sup>	-	1
61	http://www.govtislaves.info <sup>a</sup>	-	1
62	http://www.headlines-news.com <sup>a</sup>	-	1
63	http://www.huffingtonpost.co.uk	750,000	3
64	http://www.ibtimes.co.uk	1,380,000	3
65	http://www.independent.ie <sup>a</sup>	-	1
66	http://www.infiniteunknown.net	3,183	1
67	http://www.iol.co.za	233,333	1

No.	Domain	Domain Unique Visitor Traffic (Daily)	Number of Articles Published
68	<a href="http://www.irishtimes.com">http://www.irishtimes.com</a> <sup>a</sup>	-	1
69	<a href="http://www.irishmirror.ie">http://www.irishmirror.ie</a>	100,000	3
70	<a href="http://www.irishtimes.com">http://www.irishtimes.com</a>	323,333	1
71	<a href="http://www.itv.com">http://www.itv.com</a>	1,026,667	2
72	<a href="http://www.lancashiretelegraph.co.uk">http://www.lancashiretelegraph.co.uk</a> <sup>a</sup>	-	1
73	<a href="http://www.lse.co.uk">http://www.lse.co.uk</a>	70,000	1
74	<a href="http://www.mgtowhq.com">http://www.mgtowhq.com</a> <sup>a</sup>	-	1
75	<a href="http://www.mirror.co.uk">http://www.mirror.co.uk</a>	3,860,000	10
76	<a href="http://www.msn.com">http://www.msn.com</a> <sup>b</sup>	-	2
77	<a href="http://www.nationalenquirer.com">http://www.nationalenquirer.com</a>	60,000	1
78	<a href="http://www.newindianexpress.com">http://www.newindianexpress.com</a> <sup>a</sup>	-	1
79	<a href="http://www.newscopia.com">http://www.newscopia.com</a> <sup>a</sup>	-	1
80	<a href="http://www.newsday.com">http://www.newsday.com</a>	132,250	1
81	<a href="http://www.newsgrio.com">http://www.newsgrio.com</a>	132,250	2
82	<a href="http://www.nigeriadailynews.news">http://www.nigeriadailynews.news</a>	16,236	4
83	<a href="http://www.nydailynews.com">http://www.nydailynews.com</a>	2,100,000	6
84	<a href="http://www.nzherald.co.nz">http://www.nzherald.co.nz</a>	686,667	1
85	<a href="http://www.oneworldofnations.com">http://www.oneworldofnations.com</a> <sup>a</sup>	-	1
86	<a href="http://www.oxfordmail.co.uk">http://www.oxfordmail.co.uk</a> <sup>a</sup>	-	1
87	<a href="http://www.pressreader.com">http://www.pressreader.com</a>	110,000	4
88	<a href="http://www.reuters.com">http://www.reuters.com</a>	2,363,333	1
89	<a href="http://www.scmp.com">http://www.scmp.com</a> <sup>a</sup>	-	1
90	<a href="http://www.scotsman.com">http://www.scotsman.com</a>	125,393	1
91	<a href="http://www.somersetlive.co.uk">http://www.somersetlive.co.uk</a> <sup>a</sup>	-	1
92	<a href="http://www.srnnews.com">http://www.srnnews.com</a> <sup>a</sup>	-	1
93	<a href="http://www.swindonadvertiser.co.uk">http://www.swindonadvertiser.co.uk</a>	22,077	2
94	<a href="http://www.telegraph.co.uk">http://www.telegraph.co.uk</a>	5,506,667	1
95	<a href="http://www.theargus.co.uk">http://www.theargus.co.uk</a>	59,281	3
96	<a href="http://www.theboltonnews.co.uk">http://www.theboltonnews.co.uk</a>	40,000	2
97	<a href="http://www.thedailybeast.com">http://www.thedailybeast.com</a>	1,636,667	3
98	<a href="http://www.thetelegraphandargus.co.uk">http://www.thetelegraphandargus.co.uk</a>	46,667	1
99	<a href="http://www.thetruthseeker.co.uk">http://www.thetruthseeker.co.uk</a>	21,757	1
100	<a href="http://www.twimovies.news">http://www.twimovies.news</a> <sup>a</sup>	-	1
101	<a href="http://www.westernmorningnews.co.uk">http://www.westernmorningnews.co.uk</a> <sup>a</sup>	-	1
102	<a href="http://www.wirralglobe.co.uk">http://www.wirralglobe.co.uk</a> <sup>a</sup>	-	3
103	<a href="http://www.yorkpress.co.uk">http://www.yorkpress.co.uk</a> <sup>a</sup>	-	1
104	<a href="http://www.yorkshirepost.co.uk">http://www.yorkshirepost.co.uk</a> <sup>a</sup>	-	1
105	<a href="https://blairzhit.wordpress.com">https://blairzhit.wordpress.com</a> <sup>a</sup>	-	1
106	<a href="https://bol.bna.com">https://bol.bna.com</a> <sup>a</sup>	-	2
107	<a href="https://ca.news.yahoo.com">https://ca.news.yahoo.com</a> <sup>b</sup>	-	1



No.	Domain	Domain Unique Visitor Traffic (Daily)	Number of Articles Published
108	<a href="https://circusbuoy.wordpress.com">https://circusbuoy.wordpress.com</a> <sup>a</sup>	-	1
109	<a href="https://quartetbooks.wordpress.com">https://quartetbooks.wordpress.com</a> <sup>a</sup>	-	1
110	<a href="https://thetruth24.info">https://thetruth24.info</a> <sup>a</sup>	-	1
111	<a href="https://www.eveningtelegraph.co.uk">https://www.eveningtelegraph.co.uk</a> <sup>a</sup>	-	2
112	<a href="https://www.theguardian.com">https://www.theguardian.com</a>	8,872,392	6
113	<a href="https://www.thesun.co.uk">https://www.thesun.co.uk</a>	1,496,667	1
114	<a href="https://www.yahoo.com">https://www.yahoo.com</a> <sup>b</sup>	-	1
115	<a href="http://ferddyjay.blogspot.com">http://ferddyjay.blogspot.com</a> <sup>a</sup>	-	1
		66,909,965	178

<sup>a</sup> - Unique daily visitor traffic not available

<sup>b</sup> - 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<sup>24</sup>, so titles such as these

<sup>24</sup> See for example: Aikat, D. News on the web: usage trends of an on-line newspaper. *Convergence: The International Journal of Research into New Media Technologies* 4, 4 (Dec. 1998), 94-110.



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 consider print distribution<sup>25</sup>, 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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<sup>25</sup> [www.theguardian.com/media/2016/mar/17/independent-mirror-express-and-star-suffer-sharp-fall-in-traffic](http://www.theguardian.com/media/2016/mar/17/independent-mirror-express-and-star-suffer-sharp-fall-in-traffic)

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 not 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.**

Shares	Date	Domain
12576	2-Jan-15	<a href="https://www.theguardian.com">https://www.theguardian.com</a>
201	3-Jan-15	<a href="http://muhammad-ali-ben-marcus.blogspot.qa">http://muhammad-ali-ben-marcus.blogspot.qa</a>
1600	3-Jan-15	<a href="http://www.dailymail.co.uk">http://www.dailymail.co.uk</a>
4000	3-Jan-15	<a href="http://www.dailymail.co.uk">http://www.dailymail.co.uk</a>
130	3-Jan-15	<a href="http://www.huffingtonpost.co.uk">http://www.huffingtonpost.co.uk</a>
45	3-Jan-15	<a href="http://www.ibtimes.co.uk">http://www.ibtimes.co.uk</a>
6436	3-Jan-15	<a href="http://www.mirror.co.uk">http://www.mirror.co.uk</a>
55	4-Jan-15	<a href="http://newsbite.it">http://newsbite.it</a>
56	4-Jan-15	<a href="http://ugandansatheart.blogspot.com">http://ugandansatheart.blogspot.com</a>
1813	4-Jan-15	<a href="http://www.dailyrecord.co.uk">http://www.dailyrecord.co.uk</a>
9	4-Jan-15	<a href="http://www.express.co.uk">http://www.express.co.uk</a>
560	4-Jan-15	<a href="http://www.huffingtonpost.co.uk">http://www.huffingtonpost.co.uk</a>
24	4-Jan-15	<a href="http://www.ibtimes.co.uk">http://www.ibtimes.co.uk</a>
54	4-Jan-15	<a href="http://www.ibtimes.co.uk">http://www.ibtimes.co.uk</a>
198	4-Jan-15	<a href="http://www.irishmirror.ie">http://www.irishmirror.ie</a>
198	4-Jan-15	<a href="http://www.mirror.co.uk">http://www.mirror.co.uk</a>
174	4-Jan-15	<a href="http://www.nigeriadailynews.news">http://www.nigeriadailynews.news</a>
51	4-Jan-15	<a href="http://www.nzherald.co.nz">http://www.nzherald.co.nz</a>

<b>Shares</b>	<b>Date</b>	<b>Domain</b>
216	4-Jan-15	<a href="http://www.telegraph.co.uk">http://www.telegraph.co.uk</a>
177	4-Jan-15	<a href="https://www.theguardian.com">https://www.theguardian.com</a>
193	4-Jan-15	<a href="https://www.theguardian.com">https://www.theguardian.com</a>
105	5-Jan-15	<a href="http://www.dailylife.com.au">http://www.dailylife.com.au</a>
192	5-Jan-15	<a href="http://www.dailyrecord.co.uk">http://www.dailyrecord.co.uk</a>
7	5-Jan-15	<a href="http://www.mirror.co.uk">http://www.mirror.co.uk</a>
1052	5-Jan-15	<a href="http://www.mirror.co.uk">http://www.mirror.co.uk</a>
96	5-Jan-15	<a href="http://www.nydailynews.com">http://www.nydailynews.com</a>
115	5-Jan-15	<a href="https://www.theguardian.com">https://www.theguardian.com</a>
45	6-Jan-15	<a href="http://www.dailymail.co.uk">http://www.dailymail.co.uk</a>
17	8-Jan-15	<a href="http://www.nydailynews.com">http://www.nydailynews.com</a>
114	10-Jan-15	<a href="http://www.dailymail.co.uk">http://www.dailymail.co.uk</a>
1	10-Jan-15	<a href="http://www.infiniteunknown.net">http://www.infiniteunknown.net</a>
1466	10-Jan-15	<a href="https://www.theguardian.com">https://www.theguardian.com</a>
1	13-Jan-15	<a href="http://whatiswrongwiththispicture2012.blogspot.qa">http://whatiswrongwiththispicture2012.blogspot.qa</a>
256	22-Jan-15	<a href="http://www.dailyrecord.co.uk">http://www.dailyrecord.co.uk</a>
120	22-Jan-15	<a href="http://www.huffingtonpost.co.uk">http://www.huffingtonpost.co.uk</a>
319	22-Jan-15	<a href="http://www.irishmirror.ie">http://www.irishmirror.ie</a>
338	22-Jan-15	<a href="http://www.mirror.co.uk">http://www.mirror.co.uk</a>
21	1-Feb-15	<a href="http://www.mirror.co.uk">http://www.mirror.co.uk</a>
342	7-Feb-15	<a href="https://www.theguardian.com">https://www.theguardian.com</a>
107	21-Sep-15	<a href="http://www.nydailynews.com">http://www.nydailynews.com</a>
33	22-Sep-15	<a href="http://www.dailymail.co.uk">http://www.dailymail.co.uk</a>
205	22-Sep-15	<a href="http://www.mirror.co.uk">http://www.mirror.co.uk</a>
1	15-Jan-16	<a href="http://jewishbusinessnews.com">http://jewishbusinessnews.com</a>
13	15-Jan-16	<a href="http://www.dailymail.co.uk">http://www.dailymail.co.uk</a>
17	15-Jan-16	<a href="http://www.nationalenquirer.com">http://www.nationalenquirer.com</a>
2	15-Jan-16	<a href="http://www.nydailynews.com">http://www.nydailynews.com</a>
7	n.d.	<a href="http://www.govtslaves.info">http://www.govtslaves.info</a>
33,758		

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<sup>26</sup>, this equates to a possible 6,751,600 individuals, in addition to the 33,758 individuals who originally shared

<sup>26</sup> <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<sup>27</sup> distribution<sup>28</sup>, 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<sup>29</sup>. In a direct calculation with numbers from this article<sup>30</sup>, 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<sup>31</sup>. 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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<sup>27</sup> [https://en.wikipedia.org/wiki/Power\\_law](https://en.wikipedia.org/wiki/Power_law)

<sup>28</sup> See for example, Tatar, A., de Amorim, M. D., Fdida, S., & Antoniadis, P. (2014). A survey on predicting the popularity of web content. *Journal of Internet Services and Applications*, 5(1), 1.

<sup>29</sup> See for example, Castillo, C., El-Haddad, M., Pfeffer, J., & Stempeck, M. (2014, February). Characterizing the life cycle of online news stories using social media reactions. In *Proceedings of the 17th ACM conference on Computer supported cooperative work & social computing* (pp. 211-223). ACM.

<sup>30</sup> Castillo, C., El-Haddad, M., Pfeffer, J., & Stempeck, M. (2014, February). Characterizing the life cycle of online news stories using social media reactions. In *Proceedings of the 17th ACM conference on Computer supported cooperative work & social computing* (pp. 211-223). ACM.

<sup>31</sup> See for example, Agarwal, D., Chen, B. C., and Wang, X. Multi-faceted ranking of news articles using post-read actions. In *Proc. of CIKM*, ACM (2012), 694-703.

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%<sup>32</sup>, 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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<sup>32</sup> Teevan, J., Adar, E., Jones, R. and Potts, M. (2006). History repeats itself: repeat queries in Yahoo's logs. In *Proceedings of the 29th annual international ACM SIGIR conference on Research and development in information retrieval* (SIGIR '06). ACM, New York, NY, USA, 703-704.


← → ↻ <https://www.google.com/#q=Ghislaine+Maxwell+obvious+lies>

Google Ghislaine Maxwell obvious lies

All Images News Videos Shopping More Search tools

About 17,000 results (0.51 seconds)

Images for Ghislaine Maxwell obvious lies [Report images](#)



[More images for Ghislaine Maxwell obvious lies](#)

**Ghislaine Maxwell denies calling Virginia Roberts a liar | Daily Mail ...**  
[www.dailymail.co.uk/.../British-madam-accused-recruiting-teenage-sex-sla...](http://www.dailymail.co.uk/.../British-madam-accused-recruiting-teenage-sex-sla...) Daily Mail ▾  
 Jan 15, 2016 - Ghislaine Maxwell (pictured), who is accused of recruiting Virginia Roberts as ... of saying Roberts' allegations were 'untrue' and 'obvious lies'.

**Ghislaine Maxwell still has connections despite link to Prince Andrew ...**  
[www.dailymail.co.uk/.../Ghislaine-Maxwell-s-link-sex-scandal-court-papers...](http://www.dailymail.co.uk/.../Ghislaine-Maxwell-s-link-sex-scandal-court-papers...) Daily Mail ▾  
 Jan 9, 2015 - Ghislaine Maxwell stands accused of 'procuring' girls, including ... Ms Maxwell has called her claims 'obvious lies', while the Prince has put out ...

**British socialite to face Epstein accuser's defamation lawsuit | Reuters**  
[www.reuters.com/article/us-maxwell-defamation-lawsuit-idUSKCN0W34ZN](http://www.reuters.com/article/us-maxwell-defamation-lawsuit-idUSKCN0W34ZN) Reuters ▾  
 Mar 1, 2016 - ... socialite Ghislaine Maxwell of defamation for calling her allegations lies, ... been "shown to be untrue," and that her "claims are obvious lies."

**Ghislaine Maxwell denies being a madam for paedophile Jeffrey ...**  
[www.express.co.uk/News/World](http://www.express.co.uk/News/World) Daily Express ▾  
 Jan 4, 2015 - Ghislaine Maxwell's original response to the lies and defamatory ... "(The woman's) claims are obvious lies and ... should be treated as such and ...

**Jeffrey Epstein sex slave accuser sues Brit socialite - NY Daily News**  
[www.nydailynews.com/.../jeffrey-epstein-sex-slave-accuser-sue...](http://www.nydailynews.com/.../jeffrey-epstein-sex-slave-accuser-sue...) New York Daily News ▾  
 Sep 21, 2015 - She says Ghislaine Maxwell set up the sex encounters with the New York ... by Maxwell's spokesman calling Guffre's claims "obvious lies."

**Socialite wants defamation lawsuit by 'sex slave' tossed - NY Daily News**

# 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 month<sup>33</sup>. So, one sees the expected increase in searching for key terms based on the increase posting of articles.

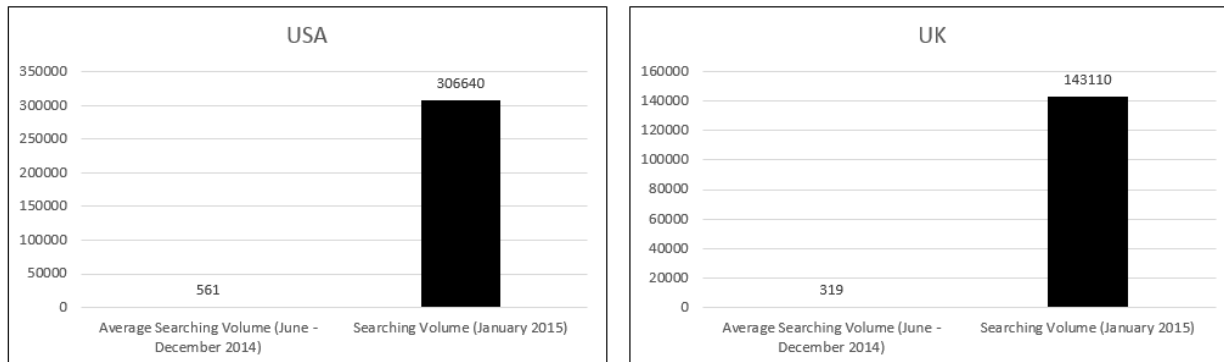
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<sup>33</sup> Note: I use the US and the UK as sample countries since there are aspect of the story that relate to each country.



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*.**



## **XII 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.

DATED: 09 September 2016

Respectfully submitted,

By \_\_\_\_\_

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## Appendix A Curriculum Vitae



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### Full Professor

College of Information Sciences and Technology  
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Blog: <http://jimjansen.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 (ISL<sup>2</sup>), 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 ecommerce, 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 ecommerce 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

Advertising (Cambridge University Press), author of the book Understanding User - Web Interactions Via Web Analytics, co-author of the book, Web Search: Public Searching of the Web, and co-editor of the book Handbook of Research on Weblog Analysis.

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.
- 2015 **Best Paper**: Liu, Z. and Jansen, B. J. (2015) *Subjective versus Objective Questions: Perception of Question Subjectivity in Social Q&A*. 2015 International Conference on Social Computing, Behavioral-Cultural Modeling, and Prediction (SBP15). Washington DC, p. 131-140. 31 Mar.-3 Apr.
- 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 [tit.its.psu.edu/2011/07/24/jim-jansen/](http://tit.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](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 **Best Paper**, Jansen, B. J., Zhang, M., and Schultz, C. (2008) *The Effect of Brand on the Evaluation of IT System Performance*. Proceedings of the Southern Association for Information Systems Conference, Richmond, VA, USA 13-15 March 2008
- 2008 Presented with a **Google Faculty Research Award** (\$50,000)
- 2007 Article selected as **Highly Commended Winner** at the Emerald Literati Network Awards for Excellence 2007. Spink, A. and Jansen, B. J. (2006) *Searching multiple federate content Web collections*, Online Information Review. 30(5), 485-495.
- 2004 Worldwide press coverage for book Web Search: Public Searching of the Web, co-authored with Dr. Amanda Spink. Including AP, Yahoo! News, CNN, MSN, and numerous other television, radio, Web, and print outlets.
- 2003 Worldwide press coverage and interviews 6/30/2003-7/3/2003 reference article: Jansen, B. J., and Spink, A. (2003) *An analysis of Web pages retrieved and viewed*, IC'03: Internet Computing: Web Mining Session, Las Vegas, 4-6 June, 2003. Including: BBC, Irish Radio, Washington Times, Psychology Today, and several U.S. radio stations.
- 2003 **ISI Most Highly Cited Articles in Field of Web Searching** for the manuscript Jansen, B. J., Spink, A., and Saracevic, T. (2000) *Real Life, Real Users, and Real Needs: A Study and Analysis of User Queries on the Web*, Information Processing & Management. 38(2), 207-227.  
  
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 **Highly Commended Article** invited for journal publication. Jansen, B. J. (2002) *Towards Implementing a Cognitive Model of Searching*, Proceedings of the E-Learning 2002 Conference (Web Track), Montreal, Canada. 15-19 October.
- 2002 **Two Crystal Awards of Excellence** for outstanding software development in the communications field.

## **Honors and Awards**

2002 Worldwide press coverage and interviews 3/31/02- 4/5/02 reference article: Spink, A., Jansen, B. J., Wolfram, D., and Saracevic, T. (2002). *From e-sex to e-commerce: Web search changes*, IEEE Computer, 35(3), 133-135.

Including: Associated Press, BBC, CBC, MSNBC, Wall Street Journal, New York Times, PC World, CNN, Chinese People's Daily, Toronto Star, US News and World Report, San Francisco Chronicle, The Independent (UK), Business Week, Washington Post, Financial Times (UK), Information Week, Web, TV, newspaper (200+) and magazine media.

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.

2000 **Highly Commended Award** by MCB Publishers, for: Spink, A., Bateman, J., and Jansen, B. J. (1999) *Searching the Web: A survey of Excite users*, Journal of Internet Research: Electronic Networking Applications and Policy, 9(2), 117-128.

1998 **Top Paper Award** for: Spink, A., Bateman, J., and Jansen, B. J. (1998) *Users' searching behavior on the Excite Web search engine*, 1999 World Conference on the WWW and Internet, Orlando, Florida.

1997 **ACM Student Research Award** for: Jansen, B. J. (1997) *Simulated Annealing for Query Results Ranking*, Computer Science Education Conference, San Jose, CA. 28 – 30 February.

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

1992 **Research Award** from U.S. Army Trainer Journal

## **Books**

**Jansen, B. J.** (2011). Understanding Sponsored Search: Coverage of the Core Elements of Keyword Advertising. Cambridge University Press: Cambridge, UK.

**Jansen, B. J.** (2009) Understanding User – Web Interactions via Web Analytics. Morgan-Claypool Lecture Series. Marchionini, G. (Ed). Morgan-Claypool: San Rafael, CA.

**Jansen, B. J.**, Spink, A., and Taksa, I. Editors. (2009) Handbook of Research on Web Log Analysis, Hershey, PA: Idea Group Publishing.

## **Books**

Spink, A., and **Jansen, B. J.** (2004) Web Search: Public Searching of the Web, Dordrecht: Kluwer Academic Publishers.

## **Parts of Books**

**Jansen, B. J.** (2016) *Log Analysis*. Research Methods in Library and Information Science. Libraries Unlimited.

Mukherjee, P, Kozlek, B., Gyorke, A., Campese, C. and **Jansen, B. J.** (2014) *Leveraging Mobile Technology to Enhance Both Competition and Cooperation in an Undergraduate STEM Course*. Innovative Practices in Teaching Information Sciences and Technology: Experience Reports and Reflections. p. 167-178. New York: Springer.

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**Jansen, B. J.** and Hamilton, J. A. (1997) *Modeling and Simulating an Army Information Support Structure*, Simulation Multi-Conference, Atlanta, Georgia. January.

**Papers Presented at Technical and Professional Meetings**

An, J., Cho, H.Y., Kwak, H., and **Jansen, B. J.** (2016) *Towards Automatic Persona Generation Using Social Media*. The Third International Symposium on Social Networks Analysis, Management and Security (SNAMS 2016), The 4th International Conference on Future Internet of Things and Cloud. 22-24 August.

Mukherjee, P. and **Jansen, B. J.** (2016) *The Changing Nature of Viewership: Formality of Social Media Conversations*. Workshop on Following user pathways: Using cross platform and mixed methods analysis in social media studies. ACM Conference on Human Factors in Computing Systems (CHI2016), San Jose, CA, USA, 7-12 May.

Kwon, S., Abbar, S. and **Jansen, B. J.** (2016) *Identifying Virality Attributes of Arabic Language News Articles*. Qatar Foundation Annual Research Conference 2016 (ARC'16), Doha, Qatar. 22 March.

An, J., Kwan, H., Cho, H., Hassen, M.Z., and **Jansen, B. J.** (2016) *Efforts Towards Automatically Generating Personas in Real-time Using Actual User Data*. Qatar Foundation Annual Research Conference 2016 (ARC'16), Doha, Qatar. 22 March.

Mukherjee, P. and **Jansen, B. J.** (2015) *Correlation of Brand Mentions in Social Media and Web Searching Before and After Real Life Events: Phase Analysis of Social Media and Search Data for Super Bowl 2015 Commercials*. 1st International Workshop on Event Analytics using Social Media Data at The IEEE International Conference on Data Mining series (ICDM 2015), Atlantic City, New Jersey, USA, 14 Nov.

Mukherjee, P. and **Jansen, B. J.** (2015) *Analyzing the Social Soundtrack From Second Screens Before, During, and After Real-life Events*. The First International Workshop on Online Social Networks Technologies, 2015 IEEE Jordan Conference on Applied Electrical Engineering and Computing Technologies (AEECT), Dead Sea, Jordan. 3-5 Nov.

### **Papers Presented at Technical and Professional Meetings**

**Jansen, B. J.**, Wong, J. S., Jablowski, K.W., Divinsky, A., Liu, Z., and Pursel, B. (2014) *Classifying MOOC Discussion Forum Posts as Information Seeking Interactions and Levels of Cognitive Learning*. Workshop on Learning at Scale at ACM CHI Conference on Human Factors in Computing Systems, (CHI 2014), Toronto, CA. 26 April - 1 May.

Liu, Z. and **Jansen, B. J.** (2012) *Factors Influencing the Response Rate in Social Question and Answering Behavior*. Workshop on Social Media Question Asking at 16th ACM Conference on Computer Supported Cooperative Work and Social Computing (CSCW 2013). 23-27 February. San Antonio, Texas.

**Jansen, B. J.** (2012) *Gender Demographic Targeting in Sponsored Search*. INFORMS International 2012. 24-27 June. Beijing, China.

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

Rosso, M. and **Jansen, B. J.** (2010) *Smart Marketing or Bait & Switch? Competitors' Brands as Keywords in Online Advertising*. 4th Workshop on Information Credibility on the Web (WICOW 2010). World Wide Web Conference (WWW 2010), Raleigh, NC. 26-30 April.

**Jansen, B. J.** (2009) *System Controlled Assistance for Improving Search Performance*. Human-Computer Interaction and Information Retrieval. Workshop. Washington, DC. 23 October.

**Jansen, B. J.**, Zhang, M, Sobel, K, and Chowdury, A, (2009) *The Commercial Impact of Social Mediating Technologies: Micro-blogging as Online Word-of-Mouth Branding*. ACM Conference on Computer Human Interaction (CHI2009). Boston, Massachusetts. 4 - 9 April.

Neale, L., Hunter, L., **Jansen, B. J.**, Murphy, J. (2008) *The Google Online Marketing Challenge: A Global Teaching and Learning Initiative*. 2008 Society for Marketing Advances Annual Conference. 4-9 November. St Petersburg, Florida.

**Jansen, B. J.**, Rosso, M., Russell, D., and Detlor, B. (2008) *The Google Online Marketing Challenge: A Multi-Disciplinary Global Teaching and Learning Initiative Using Sponsored Search*. 2008 Annual Meeting of the American Society for Information Science and Technology. 24-29 October Columbus, Ohio.

**Jansen, B. J.** (2008). *Viewing Searching Systems as Learning Systems*. Second Workshop on Human-Computer Interaction and Information Retrieval. 23 October. Redmond, Washington.

Murphy, J., Canhoto, A., Hofacker, C., Hunter, L., **Jansen, B. J.**, and Voorhees, C. (2008) *The Google Online Marketing Challenge: A Global Teaching and Learning Initiative*. 2008 American Marketing Association Summer Marketing Educators' Conference. 8-11 August. San Diego, California.



### **Papers Presented at Technical and Professional Meetings**

Reddy, M. and **Jansen, B. J.** (2008) *Learning about Potential Users of Collaborative Information Retrieval Systems*. Workshop on Collaborative Information Retrieval, Joint Conference on Digital Libraries (JCDL 2008). 19 June. Pittsburgh, Pennsylvania.

**Jansen, B. J.**, Bhavnani, S., Murray, G. C., Spink, A. and Wolfram, D. (2007) *Web Log Analysis Panel*, 2007 Annual Meeting of the American Society for Information Science and Technology. Milwaukee, Wisconsin. 18-25 October.

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.

**Jansen, B. J.** and Spink, A. (2007) *The Effect on Click-through of Combining Sponsored and Non-Sponsored Search Engine Results in a Single Listing*, 16th International World Wide Web Conference (WWW2007) Workshop on Sponsored Search Auctions. Banff, Canada. 8-12 May.

Paper: [http://opim.wharton.upenn.edu/ssa3/pdf/submission\\_96.pdf](http://opim.wharton.upenn.edu/ssa3/pdf/submission_96.pdf)

**Jansen, B. J.** (2007) *Preserving the Collective Expressions of the Human Consciences*, 16th International World Wide Web Conference (WWW2007) Workshop on Query Log Analysis: Social and Technical Challenges. Banff, Canada. 8-12 May.

Paper: [http://www2007.org/workshops/paper\\_58.pdf](http://www2007.org/workshops/paper_58.pdf)

Slides: <http://querylogs2007.webir.org/slides/JimJansenQL2007.pdf>

**Jansen, B. J.**, Smith, B., and Booth, D. (2007) *Learning as a Paradigm for Understanding Exploratory Search*, Conference on Human Factors in Computing Systems (SIGCHI), Workshop on Exploratory Search Interfaces. San Jose, California. 28 April - 3 May.

Spink, A., Alvarado-Albertorio, F., and **Jansen, B. J.** (2007) *Web Search Behavior: What is Normative?*, Society of Australasian Social Psychologists (SASP) Conference. Brisbane, Australia. 12 – 15 April.

**Jansen, B. J.** and Spink, A. (2006) *Characteristics of searching on Web meta-search engines*, American Society for Information Science and Technology: Human Computer Interaction Workshop. Austin, TX. 3-9 November.

**Jansen, B. J.** (2006) *Implications of Trust of Sponsored Links for E-commerce Web Searching*, 6th Annual SIG-USE Research Symposium. American Society for Information Science and Technology (ASIS&T) Annual Conference. Austin, TX. 4 November.

Spink, A. and **Jansen, B. J.** (2006) *Web Searching: Trends and Impacts*, Oxford Internet Institute International Symposium. Journal of Information, Communication, Society: 10th Anniversary International Symposium. University of York, UK. 20 – 22 September.  
<http://www.york.ac.uk/res/siru/icsspinketal.htm>

### **Papers Presented at Technical and Professional Meetings**

**Jansen, B. J.**, Spink, A., Kathura, V., and Koshman, S. (2006) *How to Define Searching Sessions on Web Search Engines*, Workshop on Web Mining and Web Usage Analysis. The 12th ACM SIGKDD International Conference on Knowledge Discovery and Data Mining (KDD 2006). Philadelphia, Pennsylvania. 20-23 August.

**Jansen, B. J.** (2006) *Adversarial Information Retrieval Aspects of Sponsored Search*, Second International Workshop on Adversarial Information Retrieval on the Web (AIRWeb 2006). The 29th Annual International ACM SIGIR Conference on Research & Development on Information Retrieval (SIGIR2006). Seattle, Washington. 6-11 August.

**Jansen, B. J.**, Ramadoss, R. Zhang, M., and Zang, N. (2006) *Wrapper: An Application for Evaluating Exploratory Searching Outside of the Lab*, SIGIR 2006 Workshop on Evaluating Exploratory Search Systems. The 29th Annual International ACM SIGIR Conference on Research & Development on Information Retrieval (SIGIR2006). Seattle, Washington. 6-11 August.

Buzikashvili, N. and **Jansen, B. J.** (2006) *Limits of the Web Log Analysis Artifacts*, Workshop on Logging Traces of Web Activity: The Mechanics of Data Collection, The Fifteenth International World Wide Web Conference (WWW 2006). Edinburgh, Scotland. 22-26 May.

**Jansen, B. J.** (2006) *The Wrapper: An Open Source Application for Logging User – System Interactions during Searching Studies*, Workshop on Logging Traces of Web Activity: The Mechanics of Data Collection. The Fifteenth International World Wide Web Conference (WWW 2006). Edinburgh, Scotland. 22-26 May.

**Jansen, B. J.**, Rieh, S.Y., Spink, A., Wang, P., and Wolfram, D. (2005) *Panel Presentation: Internet Usage Transaction Log Studies: The Next Generation*, American Society for Information Science & Technology 2005 Annual Meeting. Charlotte, North Carolina. 28 October – 2 November.

Toms, E.L., **Jansen, B. J.**, and Muresan, G. (2005) *Panel Presentation: Evaluating Success in Search Systems*, American Society for Information Science & Technology 2005 Annual Meeting. Charlotte, North Carolina. 28 October – 2 November.

**Jansen, B. J.** (2005) *A Multi-Disciplinary, Multi-Level, and Multi-Spectrum View of Interaction*, The First Conference of the i-School Community: Bridging Disciplines to Confront Grand Challenges. 28-30 September 2005, State College, PA.

**Jansen, B. J.** and Resnick, M. (2005) *Examining Searcher Perceptions of and Interactions with Sponsored Results*, Workshop on Sponsored Search Auctions, The Sixth ACM Conference on Electronic Commerce (EC'05). Vancouver, Canada. 5-8 June.

**Jansen, B. J.** (2005) *Automated Searching Assistance for Exploratory Search*, Seminar on Exploratory Search Interfaces at the University of Maryland sponsored by the Human-Computer Interaction (HCI) Lab. College Park, Maryland. 2 June.



### **Papers Presented at Technical and Professional Meetings**

Shingle, A. **Jansen, B. J.**, and Spink, A. (2005) *Television Advertising of Prescription Drugs: A Study of Its Effect on Consumer Web Searching*, IEEE 6th International Conference on Information Technology, Coding and Computing, Las Vegas, Nevada, 11-13 April, 2005.

**Jansen, B. J.**, Spink, A., and Pederson, J. (2004) *An Analysis of Multimedia Searching on AltaVista*, Presentation at Workshop on User Searching, World Wide Web Conference, New York, New York, 18 May 2004.

De Ycaza, S., Doran, S., Eastman, C., and **Jansen, B. J.** (2003) *Nutritional Information on the Web: An Analysis of Information Sought and Information Provided*, South Carolina Nutrition Research Summit, Columbia, SC. 17 October 2004.

**Jansen, B. J.** (1998) *An Analysis of User Queries on the Web: The Implications for the Design of Military Information Retrieval Systems*, Fifth Annual US Army Research Laboratory and United States Military Academy Technical Symposium, West Point, New York.

**Jansen, B. J.** (1997) *Simulated Annealing in Information Retrieval*, Fifth Annual US Army Research Laboratory and United States Military Academy Technical Symposium, West Point, New York.

Adams, W. J. and **Jansen, B. J.** (1997) *Integrating Usability Design Principles into an Existing Engineering Curriculum*, The American Society for Engineering Education National Conference, Milwaukee, Wisconsin.

**Jansen, B. J.** and Adams, W. L. (1997) *Integrating User Centered Design into an Introductory Engineering Course*, American Society for Engineering Education Zone 1 Meeting, West Point, New York.

### **Scholarly Reports**

**Jansen, B. J.** (2011) *The civic and community engagement of religiously active Americans*. Pew Internet & American Life Project, Pew Research Center. 13 December.  
<http://pewinternet.org/Reports/2011/Social-side-of-religious.aspx>

**Jansen, B. J.** (2010) *65% of Internet Users Have Paid for Online Content*. Pew Internet & American Life Project, Pew Research Center. 30 December.  
<http://www.pewinternet.org/Reports/2010/Paying-for-Content.aspx>

**Jansen, B. J.** (2010) *Use of the internet by higher income households*. Pew Internet & American Life Project, Pew Research Center. 24 November.  
<http://www.pewinternet.org/Reports/2010/Better-off-households.aspx>

**Jansen, B. J.** (2010) *Online Product Research*. Pew Internet & American Life Project, Pew Research Center. 29 September.  
<http://pewinternet.org/Reports/2010/Online-Product-Research.aspx>

<b>Funded Projects, Grants, Commissions, and Contracts</b>	
2015 - 2014	Title: Web Analytics for a Research University Library Granting Agency: <b>Penn State, University Library</b> Total Amount: \$19,717 Role: Principal Investigator
2015 - 2013	Title: Exploring Scholarly Discourse in MOOC Discussion Forums Granting Agency: <b>Penn State, Center for Online Innovation in Learning</b> Total Amount: \$30,383 Role: Principal Investigator
2014 - 2010	Title: Broadband to Support SMEs in Pennsylvania Granting Agency: <b>Commonwealth of Pennsylvania</b> Total Amount: \$500,000 Role: Faculty Investigator (\$70,000)
2014 - 2010	Title: Semantic CiteSeerX Granting Agency: <b>National Science Foundation</b> 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: <b>Google</b> Amount: \$50,000 Role: Principal Investigator
2011 - 2009	Title: Using Keyword Advertising for Economic and Workforce Development Granting Agency: The <b>Pennsylvania State University</b> Amount: \$25,000 Role: Principal Investigator
2011 - 2010	Title: Toolkits for Deployable Best Practices Granting Agency: <b>Office of Naval Research STTR Phase II</b> Total Amount: \$750,000 Role: Principal Investigator (\$87,500)
2011 - 2010	Title: RAPID: Text Message-based Infrastructure for Emergency Response Granting Agency: <b>National Science Foundation</b> Total Amount: \$75,000 Role: Principal Investigator (\$15,000)

<b>Funded Projects, Grants, Commissions, and Contracts</b>	
2009 - 2008	Title: Toolkits for Deployable Best Practices Granting Agency: <b>Office of Naval Research</b> STTR Phase I Total Amount: \$100,000 Role: Principal Investigator (\$15,000)
2009 - 2007	Title: REU Supplement for CRI: Collaborative: Next Generation CiteSeer Granting Agency: <b>National Science Foundation</b> Amount: \$12,000 Role: Co-Principal Investigator (\$12,000).
2009 - 2006	Title: Synchronized Interactions Among Users, Systems, and Information Granting Agency: <b>Air Force Research Lab</b> Amount: \$463,000 Role: Principal Investigator (\$463,000).
2008 - 2005	Title: The Next Generation CiteSeer Granting Agency: <b>National Science Foundation</b> Amount: approximately \$1,444,984 Role: Co-principal Investigator with Dr. Lee Giles, Dr. Susan Gauch, and Dr. Jack Carroll (\$48,701)
2009 - 2007	Title: Triggers in Collaborative Information Searching Granting Agency: <b>National Science Foundation</b> Amount: \$76,000 Role: Co-principal Investigator with Dr. Madhu Reddy (\$18,119)
2009 - 2008	Title: REU Supplement for Triggers in Collaborative Information Searching Granting Agency: <b>National Science Foundation</b> Amount: \$12,000 Role: Co-principal Investigator with Dr. Madhu Reddy (\$6,000)
2007 - 2006	Title: REU Supplement for CRI: Collaborative: Next Generation CiteSeer Granting Agency: <b>National Science Foundation</b> Amount: \$9,000 Role: Co-Principal Investigator (\$9,000).
2005 - 2004	Title: Design of Tools for Information Seeking, Management, and Analysis for a Lessons Learned Knowledge System Granting Agency: <b>US Marine Corps Research University</b> Amount: \$500,000 Role: Co-Principal Investigator (\$83,957)

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

### **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 1<sup>st</sup> and 3<sup>rd</sup> 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

Guest lecturer for a month (2000) at the *Korean Military Academy* in Seoul, Republic of Korea.

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

Yuelin Lee (Committee Member) (Ph.D. degree conferred in 2008)

The Pennsylvania State University

Schreyer Honors College, thesis advising

**Megan Krause (B.S. degree expected 2107)**

**Allie Whitman (B.S. degree expected 2106)**

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**

<b>Student</b>	<b>Degree</b>	<b>Major</b>	<b>University</b>	<b>Role</b>
Arielle Amchin	BS	Marketing	Penn State	Research Mentor
Arun Das	BS	CS	Brown University	Research Mentor
Manisha Daredy	BS	MIS	Carnegie Mellon Qatar	Research Mentor
Satyajit Narayanan	BS	CS	Bharati Vidyapeeth University	Research Mentor
Will Berkheiser	BS	IST	Penn State	Work Study Mentor
				<a href="http://studentaid.psu.edu/types-of-aid/work-study-and-employment/work-study/about">http://studentaid.psu.edu/types-of-aid/work-study-and-employment/work-study/about</a>
Pat Bonner	BS	IST	Penn State	Research Mentor
Danielle Booth	BS	IST	Penn State	Research Mentor
Anna Brown	BS	IST	Penn State	Research Mentor
Nicole Butera	BS	Chemistry	Penn State	Women in Science and Engineering Research

**Supervision of Other Undergraduate Research**

Student	Degree	Major	University	Role
				(WISER) Mentor <a href="http://pa.spacegrant.org/wiser">http://pa.spacegrant.org/wiser</a>
Chris Ciamacca	BS	IST	Penn State	Research Mentor
Karen Lee	BS	IST	Penn State	Research Mentor
Dana Kracow	BS	IST	Penn State	Research Mentor
Daehee Park	BS	IST	Penn State	Research Mentor
Melissa Reizner	BS	IST	Penn State	Research Mentor
Mitchell Rukat	BS	IST	Penn State	Research Mentor
Paul Rinaldi	BS	IST	Penn State	Research Mentor
Simone Schuster	BS	Advertising	Penn State	Research Mentor
Laura Solomon	BS	Advertising	Penn State	Research Mentor
Meng Ting Sun	BS	Accounting	Penn State	Research Mentor
Pete Smith	BS	IST	Penn State	Research Mentor
Megan Tan	BS	Marketing	Penn State	Research Mentor
Courtney Weaver	BS	IST	Penn State	Research Mentor

**Professional Service****Editorial Boards**

Current – 2016	Editor-in-chief, <u>Information Processing &amp; Management</u> (Elsevier)
Current – 2016	Editorial Board Member, <u>Information Discovery and Delivery</u>
Current – 2012	Editorial Advisory Board Member, <u>Social Networks</u>
Current – 2011	Editorial Advisory Board Member, <u>International Journal of Electronic Business</u>
Current – 2009	Editorial Advisory Board Member, <u>Journal of the American Society for Information Science and Technology</u>
Current – 2009	Editorial Advisory Board Member, <u>Future Internet</u>
Current – 2006	Editorial Panel, <u>International Journal of Internet Science</u>
Current – 2006	Editorial Advisory Board Member, <u>Information Research</u>
Current – 2004	Editorial Advisory Board Member, <u>Information Processing &amp; Management</u>
2016 – 2011	Editor-in-chief, <u>Internet Research</u> (Emerald)
2011 - 2004	Editorial Advisory Board Member, <u>Journal of Internet Research</u>

**Professional Service****Editorial Boards**

- 2010 - 2004 Editorial Advisory Board Member, Library and Information Science Journal
- 2008 - 2004 Associate Editor (Book Reviews), Information Processing & Management
- 1996 –1998 Student Editor, SIG Computer Human Interaction SIGCHI Bulletin

**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**

- 2016 Reviewer, IEEE Systems, Man and Cybernetics, Computers in Human Behavior, International Journal of Human Computer Interaction, Cornell Hospitality Review
- 2015 Reviewer, Transactions on Intelligent Systems and Technology, Journal of Organizational Computing and Electronic Commerce, European Journal of Marketing, Journal of Information Management, Transactions on Management Information Systems
- 2014 Reviewer, MIS Quarterly, Journal of Organizational Computing and Electronic Commerce, Computers in Human Behavior, Journal of Documentation, IEEE Systems, Man and Cybernetics, Tourism Management
- 2013 Reviewer, Technological Forecasting & Social Change, IEEE Systems, Man and Cybernetics, International Journal of Electronic Commerce, ACM Transactions on the Web, Journal of Interactive Marketing, Journal of Electronic Commerce Research (2x), Electronic Commerce Research, Communications of the Association for Information Systems, Transactions on Computer-Human Interaction, Information Research, Information and Management
- 2012 Reviewer, Electronic Commerce Research, International Journal of Information Management, Journal of Information Science, Communication Research, International Journal of Internet Science, Journal of Organizational Computing and Electronic Commerce, Social Science Computer Review, Information Research, MIS Quarterly, Journal of Organizational Computing and Electronic Commerce, Library and Information Science, IEEE Transactions on Multimedia, Advances in Human-Computer Interaction (2x), Journal of Theoretical and Applied Electronic Commerce Research (3x), ACM Transactions on Computer-Human Interaction
- 2011 Reviewer, IEEE Transactions on Multimedia, Information Technology and People, Journal of Computer-Mediated Communication (2x), Sage Publishing, Electronic Commerce Research, International Journal of Electronic Commerce, Journal of Interactive Marketing (2x), ACM Transactions on the Web, ACM Transactions on Computer-Human Interaction
- 2010 Reviewer, International Journal of Information Management (2x), ACM Transactions on the Web, Social Science Computing Review, MIS Quarterly, International Journal of Human-Computer Studies, PLoS One, Information Research, Netherlands Organisation for Scientific Research, Computing Surveys, Information Sciences, Future Internet, International Information and Library Review, International Journal of Internet Science, Behaviour & Information Technology, Journal of Media Economics
- Reviewer Award**
- 2010 Reviewer, Internet Research
- 2009 Reviewer, The Computer Journal, ACM Transactions on the Web, International Journal of Electronic Commerce, Data & Knowledge Engineering Journal, ACM Transactions on Information Systems

## **Professional Service**

### **Ad hoc Reviewing**

- 2008 Reviewer, Journal of the Academy of Marketing Science, ACM Transactions on the Web, ACM Transactions on Information Systems, Decision Support Systems, New Media & Society, IEEE Internet Computing, Journal of Service Science and Management, IEEE Transactions on Professional Communication, International Journal of Knowledge Management Studies
- 2007 Reviewer, Simulation Modelling Practice and Theory, ACM Transactions on Information Systems
- 2006 Reviewer, Journal of Information Science, ACM Transactions on Information Systems
- 2005 Reviewer, Journal of Medical Internet Research, ACM Transactions on Information Systems
- 2005 Reviewer, IEEE Systems, Man and Cybernetics Journal, Computer Networks Journal
- 2004 Reviewer, Information Retrieval, Information Processing & Management, Journal of Web Engineering, Journal of Library & Information Science Research
- 2003 Reviewer, IEEE Proceedings-Software, Information Processing & Management
- 2002 Reviewer, Journal of Informing Science, Information Processing & Management, The World Wide Web Journal
- 2001 Reviewer, International Journal of Human Computer Studies, Information Processing & Management
- 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**

- 2011 Reviewer, National Science Foundation Grant Proposal
- 2011 Reviewer, American Association for the Advancement of Science (AAAS) Research Competitiveness Program Grant Proposal for funding through the Maine Technology Institute's Development Awards
- 2010 Reviewer, Standard Research Grants program of the Social Sciences and Humanities Research Council of Canada (SSHRC) Grant Proposal
- 2010 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
- 2008 Reviewer, Israel Science Foundation Grant Proposal
- 2007 Reviewer, Air Force Office of Scientific Research Grant Proposal
- 2007 Reviewer, Israel Science Foundation Grant Proposal
- 2004 Grant Reviewer, Arts and Humanities Research Board Grant Proposal, Whitefairs, Lewins Mead, Bristol, UK, BS1 2AE

**Professional Service****Other**

- 2016 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.
- 2016 – 2007 Academic Panelist for The Google Online Marketing Challenge (<http://www.google.com/onlinechallenge/>). 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.
- 2015 External Examiner for Spanish PhD thesis (Universitat Pompeu Fabra Barcelona)
- 2014 – 2013 Faculty Advisor for the Penn State Digital Marketing Association
- 2012 External Examiner for Australian PhD thesis (Queensland University of Technology)
- 2012 - 2011 Member, Research Committee, Search Engine Marketing Professional Organization (SEMPO)

**Professional Service****Other**

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

**Professional Service****Conference Activities**

- 2016    Chair, Program Committee, The Second International Workshop on Online Social Networks Technologies (OSNT-2016), 13th ACS/IEEE International Conference on Computer Systems and Applications AICCSA 2016. 29 November - 2 December.
- 2016    Chair, Program Committee, The Third International Workshop on Social Networks Analysis, Management and Security (SNAMS - 2016), The 4th International Conference on Future Internet of Things and Cloud (FiCloud-2016), Vienna, Austria. 22-24 August.
- 2016    Reviewer, Papers and Posters, 79th Annual Meeting of the American Society for Information Science and Technology (ASIST 2016). Copenhagen, Denmark. 14-18 October.



## **Professional Service**

### **Conference Activities**

- 2015 Program Committee, 7<sup>th</sup> International Joint Conference on Knowledge Discovery, Knowledge Engineering and Knowledge Management, Lisbon, Portugal. 12-14 Nov.
- 2015 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.
- 2015 Reviewer, ACM CHI Conference on Human Factors in Computing Systems, Seoul, South Korea. 18-23 April.
- 2014 Reviewer, Papers and Posters, 77th Annual Meeting of the American Society for Information Science and Technology (ASIST 2014). Montreal, Canada. 31 October - 4 November.
- 2014 Program Committee: 3<sup>rd</sup> International Information Systems for Crisis Response and Management Conference (ISCRAM 2014), State College, PA. May 2014.
- 2014 Reviewer, ACM CHI Conference on Human Factors in Computing Systems, Toronto, Canada. 26 April – 1 May.
- 2013 Reviewer, Papers, 76th Annual Meeting of the American Society for Information Science and Technology (ASIST 2013). Montreal, Canada. 1-6 November.
- 2013 Reviewer, Posters, 76th Annual Meeting of the American Society for Information Science and Technology (ASIST 2013). Montreal, Canada. 1-6 November.
- 2013 Reviewer, 22<sup>nd</sup> International World Wide Web Conference (WWW 2013). 13<sup>th</sup>-17<sup>th</sup>, May, Rio de Janeiro, Brazil.
- 2013 Program Committee: European Conference on Information Retrieval (ECIR 2013) Workshop on Group Membership and Search (GRUMPS), 24 March, Moscow, Russia
- 2013 Program Committee: Sixth ACM WSDM Conference on Web Search and Data Mining Workshop on Web Search Click Data, 4-8 February, Rome, Italy.
- 2012 Program Committee: Fourth Information Interaction in Context Conference (IIIX 2012), Nijmegen, the Netherlands, 21-24 August 2012.
- 2011 Session Track Chair, 74<sup>th</sup> Annual Meeting of the American Society for Information Science and Technology (ASIST 2011). 9-13 October. New Orleans, LA.
- 2011 Program Committee, iConference. Toronto, Canada, 7-10 February.
- 2011 Program Committee: 33<sup>rd</sup> European Conference on Information Retrieval (ECIR 2011), Best Paper Committee, Dublin, Ireland, 19-21 April 2011

## **Professional Service**

### **Conference Activities**

- 2011 Program Committee: 33<sup>rd</sup> European Conference on Information Retrieval (ECIR 2011), Workshop on Information Retrieval Over Query Sessions, Dublin, Ireland, 19-21 April 2011.
- 2011 Program Committee: 12<sup>th</sup> ACM Conference on Electronic Commerce (EC11). San Jose, CA. 5-9 June.
- 2011 Program Committee: Conference on Multilingual and Multimodal Information Access Evaluation (CLEF 2011). Amsterdam, the Netherlands, 19-22 September 2011.
- 2011 Program Committee: 33<sup>rd</sup> European Conference on Information Retrieval (ECIR 2011). Dublin, Ireland. 18-21 April.
- 2010 Program Committee, American Society for Information Science and Technology Annual Meeting 2010. Pittsburgh, PA. 22-27 October.
- 2010 Program Committee: Conference on Multilingual and Multimodal Information Access Evaluation (CLEF 2010). Padua, Italy, 20-23 September.
- 2010 Program Committee: LREC 2010 Workshop on Web Logs and Question Answering (WLQA2010). Malta, 22 May.
- 2010 Program Committee: 32<sup>st</sup> European Conference on Information Retrieval (ECIR 2010). Keynes, UK. 28-31 March.
- 2009 Program Committee: Web Information and Data Management. 19<sup>th</sup> International Conference on Information and Knowledge Management (CIKM 2009). Hong Kong. 6 November.
- 2009 Program Committee: Workshop on the Analysis of System Logs. 22<sup>nd</sup> ACM Symposium on Operating Systems Principles. Big Sky, MT. 14 October.
- 2009 Program Committee: Collaborative Information Behavior. GROUP 2000. Sanibel Island, Florida. 10 May.
- 2009 Program Committee: Qualitative and Quantitative Methods in Libraries International Conference (QQML2009). Chania, Crete, Greece, 26-29 May.
- 2009 Program Committee: 31<sup>st</sup> European Conference on Information Retrieval (ECIR 2009). Toulouse, France. 6-9 April.
- 2009 Reviewer, ACM Conference on Computer Human Interaction 2009 (CHI 2009), Boston, MA, 4 – 9 April.
- 2008 Reviewer, 18<sup>th</sup> Conference on Information and Knowledge Management (CIKM 2008). Napa Valley, California. 26-30 October.

## **Professional Service**

### **Conference Activities**

- 2008 Program Committee: Workshop on Human-Computer Interaction and Information Retrieval (HCIR 2008). Redmond, Washington. 23 October.
- 2008 Program Committee: 1<sup>st</sup> Information Interaction in Context Symposium (IiX 2008). London, United Kingdom. 14-17 October.
- 2008 Program Committee: 2008 Ad Auctions Workshop. ACM Conference on Electronic Commerce in Chicago, IL. 8-9 July.
- 2008 Reviewer, Southern Association for Information Systems Conference (SAIC 2008), Richmond, VA, USA 13–15 March.
- 2007 Program Committee, IEEE International Conference on Intelligence and Security Informatics 2007 (ISI 2007), New Brunswick, New Jersey. 23-24 May, 2007
- 2007 Reviewer, Graphics Interface 2007, Montréal, Canada, 28 – 30 May 2007.
- 2007 Reviewer, American Society for Information Science and Technology Annual Meeting 2007. Milwaukee, Wisconsin. 18-25 October.
- 2007 Program Committee, 8<sup>th</sup> World Congress on the Management of eBusiness. Toronto, Canada. 11-13 July.
- 2007 Program Committee, WWW'07 Workshop on Query Log Analysis: Social and Technological Challenges. World Wide Web 2007, Banff, Alberta, Canada. 8 May.
- 2007 Program Committee, WWW'07 Workshop on Sponsored Search. World Wide Web 2007, Banff, Alberta, Canada. 8 May.
- 2007 Program Committee, Chi'07 Workshop on Exploratory Search and HCI: Designing and Evaluating Interfaces to Support Exploratory Search Interaction. ACM CHI2005, Conference on Human Factors in Computing Systems (CHI'07), San Jose, CA. 29 April 2007.
- 2007 Program Committee, IEEE Intelligence and Security Informatics Conference (ISI 2007), New Brunswick, NJ. 23 – 24 May, 2007.
- 2006 Program Committee: 2006 Research Symposium of the Special Interest Group on Human-Computer Interaction. American Society for Information Science and Technology. Austin, Texas. 5 November 5, 2006
- 2006 Reviewer, Hawaii International Conference on System Sciences 2007. Waikoloa, Big Island, Hawaii. 3-6 January, 2007.
- 2006 Program Committee: IEEE Information Technology: New Generations (ITNG) 2006, Las Vegas, NV. 16 -19 April 2007.

## **Professional Service**

### **Conference Activities**

- 2006 Reviewer for SIGIR 2006 Workshop on Evaluating Exploratory Search Systems. The 29<sup>th</sup> Annual International ACM SIGIR Conference on Research & Development on Information Retrieval (SIGIR2006). 6-11 August. Seattle, Washington.
- 2006 Program Committee: 4<sup>th</sup> International Conference on Information Technology: New Generations, 16-19 April, 2007, Las Vegas, Nevada.
- 2006 Program Committee: 1<sup>st</sup> Information Interaction in Context Symposium (IiiX symposium). Copenhagen, Denmark. 18-20 October 2006.
- 2006 Program Committee: IEEE Information Technology: New Generations (ITNG) 2006, Las Vegas, NV. 10 – 12 April 2006.
- 2006 Reviewer, The Fourth Annual Pre-ICIS Workshop on HCI Research in MIS, International Conference on Information Systems, 2005.
- 2006 Reviewer, Human Factors and Ergonomics Society 49<sup>th</sup> Annual Meeting, 2005.
- 2006 Program Committee: IEEE 6<sup>th</sup> International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 5-7 April 2005.
- 2006 Program Committee: the 5<sup>h</sup> International Conference on Conceptions of Library and Information Science, Glasgow, Scotland, 6-9 June 2005.
- 2006- 2002 Reviewer, ACM SIGIR International Conference on Information Retrieval.
- 2006 Session Track Co-chair, Web Searching Sessions (Three tracks), the IEEE 5<sup>th</sup> International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 4-6 April 2005.
- 2005 Program Committee, IEEE 6<sup>th</sup> International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 5-7 April, 2005.
- 2005 Program Committee, the 5<sup>h</sup> International Conference on Conceptions of Library and Information Science, Glasgow, Scotland, 6-9 June 2005.
- 2004 Session Track Co-chair, Web Searching Sessions (Three tracks), the IEEE 5<sup>th</sup> International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 5-7 April, 2004.
- 2004 Reviewer, ACM CHI2005, Conference on Human Factors in Computing Systems
- 1998 Session Moderator, New Engineering Educators Conference, June 1998, Seattle, Washington.
- 1998 Co-organizer for ACM Computer Science Education Research Competition, February 1998, Atlanta, Georgia.

**Professional Service****Conference Activities**

- 1998 Reviewer, New Engineering Educators Conference
- 1998 Reviewer, American Society for Engineering Education National Conference
- 1997 Session Moderator for American Society for Engineering Education National Conference, June 1997, Milwaukee, Wisconsin.

**Advisory Boards**

- Current - 2012 CLAK Impressions <http://www.linkedin.com/company/clak-impressions>
- Current - 2010 The Pennsylvania Technical Assistance Program (PennTAP), <http://penntap.psu.edu/action-council/>
- Current - 2010 Innoblue, <http://innoblue.org/>
- 2016 - 2007 Global Academic Panel, Google Online Marketing Challenge, <http://www.google.com/onlinechallenge/discover/judging-panel.html>
- 2012 - 2010 Chief Marketing Officer (CMO Council) Advisory Board for research initiative, Localize to Optimize Sales Channel Effectiveness
- 2012 - 2010 Jabbit Board of Advisors, <http://www.jabbit.com/>

**Invited Talks (Selected)**

- Keynote** Keynote, 2016 Sixth National Doctoral Forum of Information Science, 7-18 July 2016, Tianjin, China.  
<http://jimjansen.blogspot.qa/2016/07/keynote-speaker-at-2016-sixth-national.html>
- Keynote** Keynote, The 7th International IEEE on Information and Communication Systems (ICICS 2016), 5-7 April, Irbid, Jordan.
- Keynote** Keynote, The 10th International ACM Conference on Ubiquitous Information Management and Communication (IMCOM 2016), 4-6 January, Danang, Vietnam.  
<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, Yandex, 11 March 2014, St. Petersburg Russia.

<http://jimjansen.blogspot.com/2014/03/visit-to-yandex-headquarters-in-st.html>

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 and College of Information and Media, Duksung Women's College, 19 June 2013, Seoul, South Korea.

<http://jimjansen.blogspot.com/2013/06/theoretical-constructs-of-searching-and.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>

Presentation, Google Online Marketing Challenge Workshop, The University of Illinois at Urbana-Champaign, 11 March 2013.

<http://jimjansen.blogspot.com/2013/03/gomc-presentation-to-students-at.html>

### **Keynote**

Presentation, Casual Living Conference 2012, 22-24 February 2012, Sarasota, FL.

<http://accentsandfurnishings.com/conferences/casuallivingconference/2012/index.html>

Keynote, The Direct Marketing Association of Washington (DMAW) Professor Institute. 3-4 January 2012, Washington. DC.

[http://www.dmawef.org/Professors\\_Page/Professors\\_Page.html](http://www.dmawef.org/Professors_Page/Professors_Page.html)

Presentation, Advance 2011: Rediscovering the Customer. 20-22 September 2011, San Diego, CA. <http://www.idanalytics.com/advance2011/>

Webinar, Web Analytics Webinar for the American Society for Information Science and Technology, 17 June 2011. <http://asist.org/Conferences/webinars/2011/web-analytics.html>

### **Keynote**

Keynote, Buying and Selling eContent 2011. 28 March 2011, Scottsdale, AR. <http://www.buy-sell-econtent.com/2011/Speakers/JimJansen.aspx>

Presentation, Evri (semantic news aggregation company). 10 February 2011, Seattle, WA <http://jimjansen.blogspot.com/2011/02/visit-to-evri-semantic-news-aggregation.html>

Presentation, IMPAQT (search engine marketing agency). 10 November 2010, Pittsburgh, PA. <http://jimjansen.blogspot.com/2010/11/visit-to-search-engine-marketing.html>



### **Invited Talks (Selected)**

Presentation, Yahoo! Research Lab. 9 November 2010, New York, New York.  
<http://jimjansen.blogspot.com/2010/11/visit-to-yahoo-research-labs-new-york.html>

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, Query Log Analysis: From Research to Best Practice 2009/ 27-28 May. London, UK. Funded by European Union project on Evaluation, Best Practices and Collaboration for Multilingual Information Access.  
<http://ir.shef.ac.uk/cloughie/qlaw2009/index.html>

Presentation, Query Log Analysis: From Research to Best Practice 2009/ 27-28 May. London, UK. Funded by European Union project on Evaluation, Best Practices and Collaboration for Multilingual Information Access.  
<http://ir.shef.ac.uk/cloughie/qlaw2009/index.html>

Presentation, Google. 30 October 2008. Mountain View, CA.

Presentation, IMPAQT (search engine marketing agency). 28 October 2008, Pittsburgh, PA.  
<http://jimjansen.blogspot.com/2008/10/visit-to-sem-impact.html>

Presentation, Mahalo (a human power search engine). 6 July 2008, Los Angeles, CA.  
<http://jimjansen.blogspot.com/2008/07/mahalo-human-power-search-engine.html>

Presentation, Pepperjam (search engine marketing agency). 24 June 2008, Wilkes-Barre, PA. <http://jimjansen.blogspot.com/2008/06/visit-to-pepperjam.html>

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

**Keynote**

### **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 8<sup>th</sup> 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**

**TS-SCI:** Cleared for Top Secret information and granted access to Sensitive Compartmental Information based on a single scope background investigation by the Defense Security Service, Office of Personnel Management on 17 March 2011.

**Appendix B Testimony Cases**

<b>Year</b>	<b>Deliverables</b>	<b>Retained by</b>	<b>Case</b>
2016	Testimony Deposition	Plaintiff	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 & Wheeler LLP
2015	Deposition	Plaintiff	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 & Guerra LLP and DiNovo Price Ellwanger & Hardy LLP
2014	Deposition	Defendant	M.B. AS NEXT FRIEND OF J.B., A MINOR <i>Plaintiffs</i> , V. CAMP STEWART FOR BOYS, INC., AMERICAN INSTITUTE FOR FOREIGN STUDY, INC. D/B/A CAMP AMERICA, AND SCOTT ASH JAMES ZIRUS <i>Defendant</i> . NO. 5:12-CV-1133 (Western District of Texas)  Law Firm: Rymer, Moore, Jackson, & Echols PC
2014	Testimony, Deposition	Defendant	REAL LOCAL PAGE PARTNERS, LLC, Claimant, v. PAYMENT ALLIANCE INTERNATIONAL, INC., Respondent & 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 & Ellis LLP
2013	Deposition	Plaintiff	CABLE WHOLESALE.COM, INC. v. SF CABLE, INC. Case No. CV 11-2966 EMC (Northern District of California)  Law Firm: Law Offices of James G. Schwartz P.C.

## Appendix C Documents Referenced

### Web Services

- Alexa [www.alexa.com/](http://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/](http://www.google.com/)
- Google Trends <https://www.google.com/trends/>
- Microsoft Bing Keyword Tool [www.bing.com/toolbox/keywords](http://www.bing.com/toolbox/keywords)
- Million Short <https://millionshort.com/>
- SimiliarWeb [www.similarweb.com/](http://www.similarweb.com/)
- SpyFu [www.spyfu.com/](http://www.spyfu.com/)
- W3Snoop <http://www.w3snoop.com/>

### Documents

- Agarwal, D., Chen, B. C., and Wang, X. *Multi-faceted ranking of news articles using post-read actions*. In Proc. of CIKM, ACM (2012), 694-703.
- Aikat, D. *News on the web: usage trends of an on-line newspaper*. Convergence: The International Journal of Research into New Media Technologies 4, 4 (Dec. 1998), 94-110.
- BBC News [https://en.wikipedia.org/wiki/BBC\\_News](https://en.wikipedia.org/wiki/BBC_News)
- Castillo, C., El-Haddad, M., Pfeffer, J., & Stempeck, M. (2014, February). *Characterizing the life cycle of online news stories using social media reactions*. In Proceedings of the 17th ACM conference on Computer supported cooperative work & social computing (pp. 211-223). ACM.
- Complaint, VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. CASE NO. 1:15-cv-07433
- Daily Mirror [https://en.wikipedia.org/wiki/Daily\\_Mirror](https://en.wikipedia.org/wiki/Daily_Mirror)
- GIUFFRE001120
- GM\_00068 (Gow E-Mail)
- <http://digitalmeasurement.nielsen.com/files/metrics-guidelines.pdf>
- <http://www.ebizmba.com/articles/news-websites>
- <http://www.mirror.co.uk/news/uk-news/prince-andrews-pal-ghislaine-maxwell-5081971>
- <http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505>
- <http://www.pewresearch.org/fact-tank/2014/02/03/6-new-facts-about-facebook/>
- [https://www.google.com/advanced\\_search](https://www.google.com/advanced_search)
- <https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/>
- Mail Online [https://en.wikipedia.org/wiki/Mail\\_Online](https://en.wikipedia.org/wiki/Mail_Online)
- Power Law [https://en.wikipedia.org/wiki/Power\\_law](https://en.wikipedia.org/wiki/Power_law)
- Snowball sampling [https://en.wikipedia.org/wiki/Snowball\\_sampling](https://en.wikipedia.org/wiki/Snowball_sampling)

- Tatar, A., de Amorim, M. D., Fdida, S., & Antoniadis, P. (2014). A survey on predicting the popularity of web content. *Journal of Internet Services and Applications*, 5(1), 1.
- Teevan, J., Adar, E., Jones, R. and Potts, M. (2006). History repeats itself: repeat queries in Yahoo's logs. In *Proceedings of the 29th annual international ACM SIGIR conference on Research and development in information retrieval* (SIGIR '06). ACM, New York, NY, USA, 703-704.
- The Independent [https://en.wikipedia.org/wiki/The\\_Independent](https://en.wikipedia.org/wiki/The_Independent)
- The Times [https://en.wikipedia.org/wiki/The\\_Times](https://en.wikipedia.org/wiki/The_Times)
- Triangulation (social science)  
[http://en.wikipedia.org/wiki/Triangulation\\_%28social\\_science%29](http://en.wikipedia.org/wiki/Triangulation_%28social_science%29)
- [www.theguardian.com/media/2016/mar/17/independent-mirror-express-and-star-suffer-s-harp-fall-in-traffic](http://www.theguardian.com/media/2016/mar/17/independent-mirror-express-and-star-suffer-s-harp-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 28<sup>TH</sup>, 2016**

*Slave, Virginia Roberts Lies, Virginia Giuffre Lies, Virginia Roberts Giuffre Lies, Virginia Roberts Untrue, Virginia Giuffre Untrue, Virginia Roberts Giuffre Untrue, Virginia Roberts Liar, Virginia Giuffre Liar, Virginia Roberts Giuffre Liar, Virginia Roberts Ross Gow, Virginia Giuffre Ross Gow, Virginia Roberts Giuffre Ross Gow, Virginia Roberts Ross dishonest, Virginia Giuffre Ross dishonest, Virginia Roberts Giuffre dishonest, victims refuse silence sex slave*

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](mailto:ross@acuityreputation.com)>  
Date: 2 January 2015 at 20:38  
Subject: Ghislaine Maxwell  
To: Rossacuity Gow <[ross@acuityreputation.com](mailto:ross@acuityreputation.com)>  
bcc: [martin.robinson@mailonline.co.uk](mailto:martin.robinson@mailonline.co.uk),  
[P.Peachey@independent.co.uk](mailto:P.Peachey@independent.co.uk),  
[nick.sommerlad@mirror.co.uk](mailto:nick.sommerlad@mirror.co.uk),  
[david.brown@thetimes.co.uk](mailto:david.brown@thetimes.co.uk),  
[nick.alway@bbc.co.uk](mailto:nick.alway@bbc.co.uk),  
[jo-anne.pugh@bbc.co.uk](mailto: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)



Page: 1 Document Name: untitled

PANEL: \_\_\_\_\_ A07. ASSIGNMENT HISTORY YEAR: 16  
 T234 Monday May 23, 2016 9:04 am  
 STDT: [REDACTED] ROBERTS, VIRGINIA L SCHL: 3390 GR: 10 ST: I

A ENTRY		WITHDRAWAL		P												E	
C	CD	DATE	OD	CD	DATE	R	PF	SY	CL	DS	SCHL	DESC	GR	PRS	ABS	UNX	Y
—	R02	101201	—	W26	030702	N	—	02	01	—	3390	SURVIVORS	10	56	31	—	Y
—	R02	092001	—	W02	101101	N	—	02	01	—	2331	ROYAL PALM HIG	10	13	1	—	—
—	EA1	081401	—	W32	092001	Z	—	02	A1	—	2192	WLLNGTN HS ADL	30	—	—	—	—
—	EA1	081600	—	W47	081301	Z	—	01	A1	—	2192	WLLNGTN HS ADL	30	—	—	—	Y
—	EA1	062100	—	W47	081500	Z	—	00	A1	—	2192	WLLNGTN HS ADL	30	—	—	—	Y
—	E01	081699	—	W03	081699	N	—	00	01	—	2331	ROYAL PALM HIG	10	—	—	—	—
—	E01	081998	—	W02	060999	P	—	99	01	—	0581	FOREST HILL HI	09	155	25	—	Y
—	E01	082097	—	W01	061098	R	—	98	01	—	2331	ROYAL PALM HIG	09	147	33	—	Y
—	E01	082097	—	W22	082097	N	—	98	01	—	2191	WELLINGTON HIG	09	—	—	—	—
—	R03	040797	—	W02	061197	P	—	97	01	—	1691	CRESTWOOD MID	08	40	5	—	Y
—	E01	082294	—	DNE	082294	N	—	95	01	—	1703	ROYAL PINES SC	06	—	—	—	—
—	E01	082393	—	W02	061094	P	—	94	01	—	1901	LOXAHATCHEE EL	05	167	13	—	Y
—	E01	082592	—	W01	061193	P	—	93	01	—	1901	LOXAHATCHEE EL	04	176	4	—	Y

PF1=HELP 3=EXIT 5=REFRESH 7=BKWD 8=FWD 9=NEXT PAGE 12=ESCAPE  
 PAGE FULL...CONTINUE.

TERML: I1B5

FILE: SRTS1219  
PAGE 3

TO - DISTRICT: 0000050 PALM BEACH SCHOOL DISTRICT SCHOOL: 3390 COURSE INFORMATION  
 GRADE LEVEL: 10 PREPARED DATE: 05/23/2016 CURRENT DISTRICT: 50 PALM BEACH SCHOOL  
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L

DISTRICT: 50 SCHOOL: 0581 FOREST HILL HIGH  
 YEAR: 1998-1999 GRADE LEVEL: 09

T	COURSE#	COURSE TITLE	AREA FLAG	SUBJECT	CRSE	G	A	O	CREDIT
1	0500500	PERS,CAR,SCH DEV 1	EL	EL	EL	B	Z	N	0.50 0.50
1	0701320	FRENCH 1	FL	EL	EL	C	Z	N	0.50 0.50
1	1001340	ENG 2	EN	EL	EL	A	Z	N	0.50 0.50
1	1200380	ALG 1-B	MA	JR	EL	F	Z	N	0.50 0.00
1	1900300	DRIVER ED CLASS	EL	EL	EL	B	Z	N	0.50 0.50
1	2000310	WORLD HIST	WH	EL	EL	C	Z	N	0.50 0.50
1	2109310	WORLD HIST	WH	EL	EL	F	Z	N	0.50 0.00
2	0500500	PERS,CAR,SCH DEV 1	EL	EL	EL	F	Z	N	0.50 0.00
2	0701320	FRENCH 1	FL	EL	EL	F	Z	N	0.50 0.00
2	0800300	HEALTH-LIF MGMT SK	LM	EL	EL	F	Z	N	0.50 0.00
2	1001340	ENG 2	EN	EL	EL	F	Z	N	0.50 0.00
2	1200380	ALG 1-B	MA	JR	EL	F	Z	N	0.50 0.00
2	2000310	BIO 1	SC	EL	EL	F	Z	N	0.50 0.00
2	2109310	WORLD HIST	WH	EL	EL	F	Z	N	0.50 0.00

CREDIT, TERM:

GPA QTY PTS  
 DISTRICT-TERM: 1.2857 9.00 CUM: 1.5714 22.00  
 STATE-TERM: 1.2857 9.00 CUM: 1.5714 22.00

1998-1999 ANNUAL DAYS-PRESENT: 155 ABSENT: 25  
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0  
 ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN  
 YEAR: 1999-2000 GRADE LEVEL: NA

GPA QTY PTS  
 DISTRICT-TERM: 1.4286 5.00 CUM: 1.5429 27.00  
 STATE-TERM: 1.4286 5.00 CUM: 1.5429 27.00

1999-2000 ANNUAL DAYS-PRESENT: 0 ABSENT: 0  
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0  
 PROMOTION STATUS NOT APPLICABLE

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN  
 YEAR: 2000-2001 GRADE LEVEL: NA

GPA QTY PTS  
 DISTRICT-TERM: 1.4286 5.00 CUM: 1.5429 27.00  
 STATE-TERM: 1.4286 5.00 CUM: 1.5429 27.00

2000-2001 ANNUAL DAYS-PRESENT: 0 ABSENT: 0  
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0  
 PROMOTION STATUS NOT APPLICABLE

DISTRICT: 50 SCHOOL: 3390 SURVIVORS CHARTER SCHOOL  
 YEAR: 2001-2002 GRADE LEVEL: 10

T	COURSE#	COURSE TITLE	AREA FLAG	SUBJECT	CRSE	G	A	O	CREDIT
1	0500530	PERS,CAR,SCH DEV 4	EL	EL	EL	C	Z	N	0.50 0.50
1	1001440	BUS ENG I	EN	J	EL	B	Z	N	0.50 0.50
1	1205370	CONSUMER MATH	MA	C	EL	C	Z	N	0.50 0.50
1	18300310	WORKPLACE ESSENTIAL VO	VO	B	EL	B	Z	N	0.50 0.50
1	18301610	WORK EXP 1	VO	F	EL	F	Z	N	0.50 0.00
1	18301650	WORK EXP-OJT	VO	F	EL	F	Z	N	1.00 0.00

CREDIT, TERM:

GPA QTY PTS  
 DISTRICT-TERM: 1.4286 5.00 CUM: 1.5429 27.00  
 STATE-TERM: 1.4286 5.00 CUM: 1.5429 27.00

2001-2002 ANNUAL DAYS-PRESENT: 69 ABSENT: 32  
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0  
 NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

# EXHIBIT 28

## (Filed Under Seal)



**IMPORTANT MESSAGE**

FOR J.E.  
 DATE 2/27/05 TIME 10:18 <sup>A.M.</sup><sub>P.M.</sub>

M \_\_\_\_\_  
 OF Ms. Maxwell  
 PHONE/ MOBILE \_\_\_\_\_

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

MESSAGE She is home

SIGNED J.

1184

**IMPORTANT MESSAGE**

FOR J.E.  
 DATE 2/26/05 TIME 4:40 <sup>A.M.</sup><sub>P.M.</sub>

M Geon Luc  
 OF \_\_\_\_\_  
 PHONE/ MOBILE no phone #

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

MESSAGE Please!  
Call him

SIGNED J.

1184

**IMPORTANT MESSAGE**

FOR Jeffrey  
 DATE 2/28/05 TIME 12:30 <sup>A.M.</sup><sub>P.M.</sub>

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 She is home during  
if 2:30 is ok  
we are needed to  
stay in school

**IMPORTANT MESSAGE**

FOR Jeffrey  
 DATE 2/27/05 TIME 07:45 <sup>A.M.</sup><sub>P.M.</sub>

M Geon Luc  
 OF \_\_\_\_\_  
 PHONE/ MOBILE \_\_\_\_\_

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

MESSAGE That he  
called back

SAO01067



## IMPORTANT MESSAGE

FOR J. E.  
DATE 9/4/05 TIME 3:40 AM  
M 1

OF \_\_\_\_\_  
PHONE/ \_\_\_\_\_  
MOBILE \_\_\_\_\_

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	

MESSAGE \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

SIGNED J.

118

## IMPORTANT MESSAGE

FOR Ms. B. Maxwell  
DATE 9/4/05 TIME 1:40 A.M.  
M [REDACTED] R.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 She will be here  
at 3<sup>rd</sup> with somebody.

SIGNED L. 1184

## IMPORTANT MESSAGE

FOR J. E.  
DATE 9/4/05 TIME 7:25 AM  
M [REDACTED]

OF \_\_\_\_\_  
PHONE/ \_\_\_\_\_  
MOBILE \_\_\_\_\_

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Canceled [REDACTED]  
She would like to speak  
to you. I believe about  
college [REDACTED]  
Should I schedule any  
one else?  
SIGNED T. [REDACTED] 1184

## IMPORTANT MESSAGE

FOR Mr. J. Epstein  
DATE 9/4/05 TIME 2:08 AM.  
M 2 PM.

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  \_\_\_\_\_

SAO01089

 1184



**IMPORTANT MESSAGE**

FOR J.E.  
 DATE 9/10/05 TIME 5:40 AM  
 M. [REDACTED]

OF \_\_\_\_\_  
 PHONE/  
 MOBILE \_\_\_\_\_

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE I went to Sarah  
and made her water  
bottle and I went  
work out with G.M.

SIGNED J.

1184

**IMPORTANT MESSAGE**

FOR \_\_\_\_\_  
 DATE \_\_\_\_\_ TIME \_\_\_\_\_ AM  
 M. \_\_\_\_\_

OF LADA  
 PHONE/  
 MOBILE \_\_\_\_\_

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

MESSAGE The UNFINISHED  
LIFE is not playing  
yet.  
I got tickets for  
the Broken Flowers  
@ 9:30

SIGNED \_\_\_\_\_

1184

**IMPORTANT MESSAGE**

FOR J.E.  
 DATE 9/10/05 TIME 5:55 AM  
 M. [REDACTED]

OF \_\_\_\_\_  
 PHONE/  
 MOBILE \_\_\_\_\_

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She got messages  
she talk with Miles  
she will be at 12:30

SIGNED J.

1184

**IMPORTANT MESSAGE**

FOR J.E.  
 DATE \_\_\_\_\_ TIME \_\_\_\_\_ AM  
 M. \_\_\_\_\_

OF Douglas  
 PHONE/  
 MOBILE \_\_\_\_\_

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

MESSAGE Asked Jim to call  
review the report reg. the  
floor. It takes  
several days to days...

SIGNED \_\_\_\_\_

SAO01092

1184



IMPORTANT MESSAGE		
FOR	J.E.	
DATE	9/11/05	TIME 9:15 <sup>A.M.</sup> <sub>P.M.</sub>
M	[REDACTED]	
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 got a car for		
SIGNED J.		

IMPORTANT MESSAGE		
FOR	JE	
DATE		TIME _____ <sup>A.M.</sup> <sub>P.M.</sub>
M	[REDACTED]	
OF	N	
PHONE/ MOBILE		
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE [REDACTED] hasn't confirmed [REDACTED] @ 11.00 yet so she is keeping [REDACTED] on hold in case [REDACTED] doesn't call back		
SIGNED		

IMPORTANT MESSAGE		
FOR	Mr. J. Epstein	
DATE	9/11/05	TIME 10:01 <sup>A.M.</sup> <sub>P.M.</sub>
M	George Haldsmith	
OF		
PHONE/ MOBILE		
TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE		
SIGNED		

IMPORTANT MESSAGE		
FOR	J.E.	
DATE	9/10/05	TIME 10:10 <sup>A.M.</sup> <sub>P.M.</sub>
M	[REDACTED]	
OF		
PHONE/ MOBILE		
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE [REDACTED] will be at 11:AM Do you want me to cancel [REDACTED]		
SIGNED J.		

SAO01093



IMPORTANT MESSAGE		
FOR <u>J.E.</u>		
DATE <u>2/27/05</u>	TIME <u>10:18</u> <small>AM</small> <small>PM</small>	
M <u>Ms. Maxwell</u>		
OF _____		
PHONE/ MOBILE _____		
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE <u>She is home</u>		
SIGNED <u>J.</u>		

IMPORTANT MESSAGE		
FOR <u>J.E.</u>		
DATE <u>2/26/05</u>	TIME <u>4:40</u> <small>AM</small> <small>PM</small>	
M <u>Geon Luc</u>		
OF _____		
PHONE/ MOBILE <u>no phone #</u>		
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE <u>Please!</u> <u>Call him</u>		
SIGNED <u>J.</u>		

**COPY**

IMPORTANT MESSAGE		
FOR <u>Jeffrey</u>		
DATE <u>2/28/05</u>	TIME <u>12:30</u> <small>AM</small> <small>PM</small>	
M <u>in</u>		
OF _____		
PHONE/ MOBILE _____		
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE <u>She is home during</u> <u>if 2:30 is ok</u> <u>we are ready to</u> <u>stay in school</u>		
SIGNED _____		

IMPORTANT MESSAGE		
FOR <u>Jeffrey</u>		
DATE <u>2/27/05</u>	TIME <u>07:45</u> <small>AM</small> <small>PM</small>	
M <u>Geon Luc</u>		
OF _____		
PHONE/ MOBILE _____		
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE <u>That he</u> <u>called back</u>		
SIGNED _____		

SAO01446

IMPORTANT MESSAGE		
FOR	J.E.	
DATE	9/4	TIME 9:00 <sup>A.M.</sup> <sub>P.M.</sub>
M	[REDACTED]	
OF		
PHONE/ MOBILE		
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE		
- confirmed at 11:00 AM - 4:30 PM		
SIGNED _____		

IMPORTANT MESSAGE		
FOR	Jesse Staley	
DATE	09/03/05	TIME 4:40 <sup>A.M.</sup> <sub>P.M.</sub>
M	[REDACTED]	
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 _____		

IMPORTANT MESSAGE		
FOR	J.E.	
DATE	9/4/05	TIME 9:00 <sup>A.M.</sup> <sub>P.M.</sub>
M	[REDACTED]	
OF		
PHONE/ MOBILE		
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE		
It is O.K. for [REDACTED] to stop by and drop something.		
SIGNED T. _____		

IMPORTANT MESSAGE		
FOR	Jeffrey	
DATE	09/03/05	TIME 4:40 <sup>A.M.</sup> <sub>P.M.</sub>
M	[REDACTED]	
OF		
PHONE/ MOBILE	[REDACTED]	
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE		
SAO01450		
SIGNED _____		



IMPORTANT MESSAGE	
FOR	Mr. J.E.
DATE	11/08/04 TIME 1:10 P.M.
M	[REDACTED]
OF	[REDACTED]

IMPORTANT MESSAGE	
FOR	Mr. J.E.
DATE	11/08/04 TIME 1:15 P.M.
M	[REDACTED]
OF	[REDACTED]

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

MESSAGE

Please call her.

SIGNED

1184

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

MESSAGE

I have 2 female  
for him

SIGNED

1184

IMPORTANT MESSAGE	
FOR	Mr. J.E.
DATE	11/08/04 TIME 1:45 P.M.
M	[REDACTED]
OF	[REDACTED]

IMPORTANT MESSAGE	
FOR	Mr. J.E.
DATE	11/08/04 TIME 6:45 P.M.
M	David Grosz
OF	[REDACTED]

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

MESSAGE

SIGNED

1184

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

MESSAGE

SAO01452

SIGNED

1184

IMPORTANT MESSAGE	
FOR <u>H. J. E.</u>	
DATE <u>1/29/05</u>	TIME <u>10:00</u> <small>A.M.</small>
M. <u>[REDACTED]</u>	

IMPORTANT MESSAGE	
FOR <u>H. J. E.</u>	
DATE <u>1/29/05</u>	TIME <u>10:10</u> <small>A.M.</small>
M. <u>[REDACTED]</u>	

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

MESSAGE \_\_\_\_\_

Please call her.

SIGNED [Signature] 1184

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

MESSAGE \_\_\_\_\_

This is her new  
cell. number. Please  
call her

SIGNED [Signature] 1184

IMPORTANT MESSAGE	
FOR <u>J. E.</u>	
DATE <u>1/29/05</u>	TIME <u>9:00</u> <small>A.M.</small>
M. <u>Tele 2</u>	

IMPORTANT MESSAGE	
FOR <u>J. E.</u>	
DATE <u>1/29/05</u>	TIME <u>9:10</u> <small>A.M.</small>
M. <u>[REDACTED]</u>	

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

MESSAGE \_\_\_\_\_

Please call her back

SIGNED [Signature] 1184

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

MESSAGE \_\_\_\_\_

I have a female  
for him

SIGNED [Signature] 1184

SAO01455



IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>9/3/05</u>		TIME <u>8:50</u> A.M. P.M.	
[REDACTED]			
OF _____			
PHONE/ MOBILE _____			
TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	
MESSAGE <u>I left message</u> <u>for [REDACTED] to</u> <u>confirm for 11:00 AM</u> <u>and [REDACTED]</u> <u>for 4:30 PM</u>			
SIGNED <u>T.</u> 1184			

IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>8/22/05</u>		TIME <u>9:20</u> A.M. P.M.	
[REDACTED]			
OF _____			
PHONE/ MOBILE _____			
TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	
MESSAGE _____			
SIGNED <u>T.</u> 1184			

IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>9/4/05</u>		TIME <u>12:55</u> A.M. P.M.	
M. [REDACTED]			
OF [REDACTED]			
PHONE/ MOBILE _____			
TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	
MESSAGE <u>She would like to</u> <u>reschedule her</u> <u>time.</u>			
SIGNED <u>T.</u> 1184			

IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>8/22/05</u>		TIME _____ A.M. P.M.	
M. <u>G.M.</u>			
OF _____			
PHONE/ MOBILE _____			
TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	
MESSAGE _____			
SAO01477			
SIGNED <u>T.</u> 1184			

**IMPORTANT MESSAGE**

FOR Mr Epstein  
 DATE 02/02/03 TIME 8:54 A.M. ~~P.M.~~  
 M. [REDACTED]

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

MESSAGE

Could  
for Please call back,  
it's very important

SIGNED

1184

**IMPORTANT MESSAGE**

FOR JE  
 DATE 01/02/03 TIME 16:30 A.M. P.M.  
 M. [REDACTED]

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

MESSAGE

SIGNED

GM

1184

**IMPORTANT MESSAGE**

FOR GMI  
 DATE \_\_\_\_\_ TIME \_\_\_\_\_ A.M. P.M.  
 M. \_\_\_\_\_  
 OF \_\_\_\_\_  
 PHONE \_\_\_\_\_  
 AREA CODE NUMBER EXTENSION

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

SIGNED

1184

PHONED  
TO CONFIRM 10:40

**IMPORTANT MESSAGE**

FOR JE  
 DATE 01/02/03 TIME 21:06 A.M. P.M.  
 M. [REDACTED]

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

MESSAGE

WANTS TO KNOW  
IF SHE SHOULD RING  
HER FRIEND [REDACTED]  
W/ TONIGHT

SAO01456

SIGNED

M. [REDACTED]

1184



item # of BOOKS

**IMPORTANT MESSAGE**

FOR Jeffrey  
 DATE [REDACTED] TIME 5:11 A.M.  
 M. [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE has girl for  
tonight

SIGNED \_\_\_\_\_

1184

**IMPORTANT MESSAGE**

FOR Mr. Epstein  
 DATE 9/24/04 TIME 8:20 A.M.  
 M. Mr. Mark Epstein

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

MESSAGE Call me in  
New York

SIGNED \_\_\_\_\_

1184

**IMPORTANT MESSAGE**

FOR Mr. Epstein  
 DATE 9/24/04 TIME 5:29 A.M.  
 M. Mr. Mark Epstein

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

MESSAGE Will Be available  
At This Number For  
30 min. Otherwise Tomorrow  
9 AM - 100 PM

SIGNED \_\_\_\_\_

1184

**IMPORTANT MESSAGE**

FOR Jeffrey  
 DATE 9/24/04 TIME 12:30 A.M.  
 M. Dr. Moushuts

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

SIGNED \_\_\_\_\_

1184

SAO01457

IMPORTANT MESSAGE	
FOR	SARAH IN
DATE	07/10/04 TIME 6:33 A.M. P.M.
M	
OF	RA6HU

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE PL CALL

10/10/04

SIGNED

1184

IMPORTANT MESSAGE	
FOR	MR EPSTEIN
DATE	TIME A.M. P.M.
M	CECILIA (OFFICE)
OF	

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE

SIGNED

1184

IMPORTANT MESSAGE	
FOR	SARAH
DATE	7/9/04 TIME 11:01 A.M. P.M.
M	MILES

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE

HE IS WORKING  
PLEASE, RECALL MY  
BACK TO - RICH  
A HEMP

SIGNED

1184

IMPORTANT MESSAGE	
FOR	MR EPSTEIN
DATE	7/9/04 TIME 7:50 A.M. P.M.
M	

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

OF

PHONE/  
MOBILE

15  
AVAILABLE ON TUESDAY  
NO ONE FOR TOMORROW

SIGNED

SAO01461



**IMPORTANT MESSAGE**

FOR OE

DATE 7/17/04 TIME 10 AM


M [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE \_\_\_\_\_

SIGNED \_\_\_\_\_  1184

**IMPORTANT MESSAGE**

FOR SARAH

DATE 7/17/04 TIME 8:02 AM


M \_\_\_\_\_

OF GEORGE

PHONE/MOBILE \_\_\_\_\_

TELEPHONED	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE "I AM JET-LAG AND NODDING OFF. JUST SAY I CALLED HER."

SIGNED Ru  1184

**IMPORTANT MESSAGE**

FOR MR EPSTEIN


DATE 7/17/04 TIME 6:55 AM

M [REDACTED]

OF [REDACTED]

TELEPHONED	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE CAN COME TOMORROW ANY TIME OR [REDACTED] ALONE

SIGNED Ru  1184

**IMPORTANT MESSAGE**

FOR SARAH OR MR EPSTEIN


DATE 07/17/04 TIME 6:45 AM

M [REDACTED]

OF [REDACTED]

TELEPHONED	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

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

SIGNED Ru  1184

SAO01462



IMPORTANT MESSAGE			
FOR <u>JEFFREY</u>			
DATE <u>AUG 2</u>		TIME <u>12:45</u> A.M. P.M.	
M. <u>[REDACTED]</u>			
OF <u>[REDACTED]</u>			
PHONE/MOBILE <u>[REDACTED]</u>			
TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL		
CAME TO SEE YOU	WILL CALL AGAIN		
WANTS TO SEE YOU	RUSH		
RETURNED YOUR CALL	SPECIAL ATTENTION		
MESSAGE <u>THEY ARE</u> <u>AVAILABLE ALL WEEKEND</u> <u>AND <del>BEFORE</del> MAYBE</u> <u>[REDACTED]</u>			
SIGNED <u>[REDACTED]</u> 1184			

IMPORTANT MESSAGE			
FOR <u>MR EPSTEIN</u>			
DATE <u>7/25/04</u>		TIME <u>5:08</u> A.M. P.M.	
M. <u>[REDACTED]</u>			
OF <u>SNYDER</u>			
PHONE/MOBILE <u>[REDACTED]</u>			
TELEPHONED	<input type="checkbox"/> PLEASE CALL		
CAME TO SEE YOU	WILL CALL AGAIN		
WANTS TO SEE YOU	RUSH		
RETURNED YOUR CALL	SPECIAL ATTENTION		
MESSAGE <u>"RETURNING YOUR CALL"</u>			
SIGNED <u>[REDACTED]</u> 1184			

IMPORTANT MESSAGE			
FOR <u>SARA</u>			
DATE <u>AUG 2</u>		TIME <u>2:00</u> A.M. P.M.	
M. <u>[REDACTED]</u>			
OF <u>[REDACTED]</u>			
PHONE/MOBILE <u>[REDACTED]</u>			
TELEPHONED	<input type="checkbox"/> PLEASE CALL		
CAME TO SEE YOU	WILL CALL AGAIN		
WANTS TO SEE YOU	RUSH		
RETURNED YOUR CALL	SPECIAL ATTENTION		
MESSAGE <u>Please call</u> <u>IN reference to where</u> <u>the framed photo</u> <u>is I moved them</u> <u>over Mr Maxwell's</u> <u>request.</u>			
SIGNED <u>[REDACTED]</u> 1184			

IMPORTANT MESSAGE			
FOR <u>MR EPSTEIN</u>			
DATE <u>7/25/04</u>		TIME <u>1:48</u> A.M. P.M.	
M. <u>[REDACTED]</u>			
OF <u>MS MAXWELL</u>			
PHONE/MOBILE <u>[REDACTED]</u>			
TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL		
CAME TO SEE YOU	WILL CALL AGAIN		
WANTS TO SEE YOU	RUSH		
RETURNED YOUR CALL	SPECIAL ATTENTION		
MESSAGE <u>"TELL HIM TO</u> <u>CALL ME"</u>			
SAO01464			
SIGNED <u>[REDACTED]</u> 1184			

IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>8/20/05</u>		TIME <u>8:45</u> <small>AM</small>	
M <u>Tony</u>			
OF <u>[REDACTED]</u>			
PHONE/ MOBILE <u>[REDACTED]</u>			
TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>
MESSAGE _____			
SIGNED <u>J.</u> 1184			

IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>8/20/05</u>		TIME <u>12:40</u> <small>AM</small>	
M <u>[REDACTED]</u>			
OF _____			
PHONE/ MOBILE _____			
TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>
MESSAGE <u>Please call him</u>			
SIGNED <u>J.</u> 1184			

IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>8/20/05</u>		TIME <u>8:50</u> <small>AM</small>	
M <u>[REDACTED]</u>			
OF _____			
PHONE/ MOBILE _____			
TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>
MESSAGE <u>[REDACTED] - confirmed</u>			
<u>at 4 PM</u>			
<u>Who is scheduled</u>			
<u>for morning?</u>			
<u>I believe [REDACTED] wants</u>			
<u>to work.</u>			
SIGNED <u>J.</u> 1184			

IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>8/20/05</u>		TIME <u>7:30</u> <small>AM</small>	
M <u>Sarah</u>			
OF _____			
PHONE/ MOBILE _____			
TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input checked="" type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>
MESSAGE _____			
SAO01476			
SIGNED <u>J.</u> 1184			



IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>9/3/05</u>		TIME <u>8:50</u> A.M. P.M.	
[REDACTED]			
OF _____			
PHONE/ MOBILE _____			
TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	
MESSAGE <u>I left message</u> <u>for [REDACTED] to</u> <u>confirm for 11:00 AM</u> <u>and [REDACTED]</u> <u>for 4:30 PM</u>			
SIGNED <u>T.</u> 1184			

IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>8/22/05</u>		TIME <u>9:20</u> A.M. P.M.	
[REDACTED]			
OF _____			
PHONE/ MOBILE _____			
TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	
MESSAGE _____			
SIGNED <u>T.</u> 1184			

IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>9/4/05</u>		TIME <u>12:55</u> A.M. P.M.	
M. [REDACTED]			
OF [REDACTED]			
PHONE/ MOBILE _____			
TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	
MESSAGE <u>She would like to</u> <u>reschedule her</u> <u>time.</u>			
SIGNED <u>T.</u> 1184			

IMPORTANT MESSAGE			
FOR <u>J.E.</u>			
DATE <u>8/22/05</u>		TIME _____ A.M. P.M.	
M. <u>G.M.</u>			
OF _____			
PHONE/ MOBILE _____			
TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	
MESSAGE _____			
SAO01477			
SIGNED <u>T.</u> 1184			

IMPORTANT MESSAGE			
FOR <u>Jeffrey</u>		TIME <u>5:11</u> <u>AM</u>	
DATE <u>[REDACTED]</u>		P.M.	
OF <u>[REDACTED]</u>			
PHONE/ MOBILE <u>[REDACTED]</u>			
TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>
MESSAGE <u>has girl for</u> <u>tonight</u>			
SIGNED _____			

IMPORTANT MESSAGE			
FOR <u>Mr. Epstein</u>		TIME <u>8:29</u> <u>AM</u>	
DATE <u>4/24/04</u>		P.M.	
M.P. <u>Mark Epstein</u>			
OF _____			
PHONE/ MOBILE _____			
TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>
MESSAGE <u>Call me in</u> <u>New York</u>			
SIGNED _____			

IMPORTANT MESSAGE			
FOR <u>MR EPSTEIN</u>		TIME <u>5:29</u> <u>AM</u>	
DATE <u>4/24/04</u>		P.M.	
M <u>DR LADENSON</u>			
OF <u>[REDACTED]</u>			
TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>
MESSAGE <u>Will Be available</u> <u>At This Number For</u> <u>30 min. Otherwise Tomorrow</u> <u>9 AM - To 1:00 PM</u>			
SIGNED _____			

IMPORTANT MESSAGE			
FOR <u>Jeffrey</u>		TIME <u>1230</u> <u>AM</u>	
DATE _____		P.M.	
M <u>Dr. moushwits</u>			
OF _____			
PHONE/ MOBILE _____			
TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>
MESSAGE <u>[REDACTED]</u>			
SIGNED _____			

SAO2828



GIUFFRE001453



IMPORTANT MESSAGE			
FOR <u>bm</u>			
DATE <u>4/28/04</u>		TIME <u>2<sup>00</sup></u> <u>AM</u>	
M <u>Martha</u>			
OF <u>Colonel Bank</u>			
<div style="background-color: black; height: 20px; width: 100%;"></div>			
TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	
MESSAGE _____			
SIGNED _____			

IMPORTANT MESSAGE			
FOR <u>MS. MAXWELL</u>			
DATE <u>04/25/04</u>		TIME <u>6:55</u> <u>AM</u>	
M.S. <u>[REDACTED]</u>			
OF <u>-</u>			
<div style="background-color: black; height: 20px; width: 100%;"></div>			
TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	
MESSAGE <u>RETURNIN YOUR CALL</u>			
SIGNED <u>Rushi</u>			

IMPORTANT MESSAGE			
FOR _____			
DATE _____		TIME _____ <u>AM</u>	
M <u>[REDACTED]</u>			
OF <u>[REDACTED]</u>			
<div style="background-color: black; height: 20px; width: 100%;"></div>			
TELEPHONED		PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	
MESSAGE _____			
SIGNED _____			

IMPORTANT MESSAGE			
FOR <u>Jeffrey</u>			
DATE _____		TIME _____ <u>AM</u>	
M <u>Chislaine</u>			
OF _____			
PHONE/ MOBILE _____			
TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	
MESSAGE <u>would be helpful to</u> <u>have [REDACTED] come to</u> <u>Palm Beach today to stay</u> <u>here and help train new</u> <u>staff with Chislaine</u>			
SAO2830			
SIGNED _____			

**IMPORTANT MESSAGE**

FOR MR EPSTEIN  
 DATE 5.3.04 TIME 7 A.M.  
 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

1184

**IMPORTANT MESSAGE**

FOR MR EPSTEIN  
 DATE 5.2.04 TIME 4:15 A.M.  
 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 \_\_\_\_\_

1184

**IMPORTANT MESSAGE**

FOR JE  
 DATE \_\_\_\_\_ TIME 5:14 A.M.  
 P.M.  
 M Japenwic

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 - 18 years -  
(he spoke to me & said  
"I love Jeffrey")

SIGNED \_\_\_\_\_

1184

**IMPORTANT MESSAGE**

FOR JE  
 DATE \_\_\_\_\_ TIME 9:15 A.M.  
 P.M.  
 M EVA Monday  
night

OF \_\_\_\_\_  
 PHONE/  
 MOBILE \_\_\_\_\_

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

MESSAGE \_\_\_\_\_

SAO2832

SIGNED \_\_\_\_\_

1184



IMPORTANT MESSAGE		
FOR <u>MR. EPSTEIN</u>		
DATE	TIME <u>1:00</u>	A.M. P.M.
M <u>Darren</u>		
OF _____		
PHONE/ MOBILE _____		
TELEPHONED	<input type="checkbox"/>	PLEASE CALL
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION
MESSAGE <u>He said that</u> <u>he got a call</u> <u>from Byron</u>		
SIGNED _____ 1184		

IMPORTANT MESSAGE		
FOR <u>MR. EPSTEIN</u>		
DATE	TIME <u>7/6</u>	A.M. P.M.
M <u>DARREN</u>		
OF _____		
PHONE/ MOBILE _____		
TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION
MESSAGE _____		
SIGNED _____ 1184		

IMPORTANT MESSAGE		
FOR <u>JE</u>		
DATE	TIME <u>1:20</u>	A.M. P.M.
M _____		
OF <u>[REDACTED]</u>		
PHONE/ MOBILE _____		
TELEPHONED	<input type="checkbox"/>	PLEASE CALL
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION
MESSAGE <u>I need a work</u> <u>I need cash, I don't have</u> <u>money</u> <u>Do you have some</u> <u>work for me?</u>		
SIGNED _____ 1184		

IMPORTANT MESSAGE		
FOR <u>Sarah</u>		
DATE	TIME <u>8:10</u>	A.M. P.M.
M _____		
OF <u>[REDACTED]</u>		
PHONE/ MOBILE _____		
TELEPHONED	<input type="checkbox"/>	PLEASE CALL
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION
MESSAGE _____		
SIGNED _____ 1184		

SAO2838



IMPORTANT MESSAGE		
FOR <del>MR. EPSTEIN</del>		
DATE	TIME	A.M. P.M.
	2:45	
M. <del>SAURAH</del>		
OF <del>MS. MAXWELL</del>		
PHONE/MOBILE		
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE		
SIGNED		

IMPORTANT MESSAGE		
FOR JE.		
DATE	TIME	A.M. P.M.
	9:20	
M. <del>SAURAH</del>		
OF <del>MS. MAXWELL</del>		
PHONE/MOBILE		
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE		
<p>She said if she          can't come to her left          before 4:00 or 4:15          after 4:00 (6:00 or 7:00)          coz she has to          dinner w/ her grandpa</p>		
SIGNED		

IMPORTANT MESSAGE		
FOR MR. EPSTEIN		
DATE	TIME	A.M. P.M.
M. <del>SAURAH</del>		
OF <del>MS. MAXWELL</del>		
PHONE/MOBILE		
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE		
<p>she will see you          at 7:30</p>		
SIGNED		

IMPORTANT MESSAGE		
FOR MR. EPSTEIN		
DATE	TIME	A.M. P.M.
	2:48	
M. <del>SAURAH</del>		
OF <del>MS. MAXWELL</del>		
PHONE/MOBILE		
TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	
MESSAGE		
<p>She said that saurah          ad her messages &amp; said          that she's sorry for          not seeing you in          California.</p>		
SIGNED		

SAO2850



**IMPORTANT MESSAGE**

FOR Jeffrey  
 DATE 4/1/05 TIME 8:08 A.M.  
 M Jean-Luc

OF \_\_\_\_\_  
 PHONE/  
 MOBILE \_\_\_\_\_

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

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 \_\_\_\_\_ 1184

**IMPORTANT MESSAGE**

FOR Jeffrey  
 DATE 3/31/05 TIME 5:06 A.M.  
 M \_\_\_\_\_

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE She called if  
you would like for  
her to work. She  
is available tom.  
till noon and  
Mon - Fri  
 SIGNED \_\_\_\_\_ 1184

**IMPORTANT MESSAGE**

FOR Jeffrey  
 DATE 3/31/05 TIME 3:22 A.M.  
 M \_\_\_\_\_

OF \_\_\_\_\_  
 PHONE/  
 MOBILE \_\_\_\_\_

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**IMPORTANT MESSAGE**

FOR Jeffrey  
 DATE 3/31/05 TIME 2:40 A.M.  
 M Cecilia

OF \_\_\_\_\_  
 PHONE/  
 MOBILE \_\_\_\_\_

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE She had Martin  
Navat on the phone  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

SAO3008

# EXHIBIT 29

## (Filed Under Seal)

# EXHIBIT 30

## (Filed Under Seal)



U.S. Department of Justice

*United States Attorney  
Southern District of Florida*

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*500 South Australian Ave., Suite 400  
West Palm Beach, FL 33401  
(561) 820-8711  
Facsimile: (561) 820-8777*

September 3, 2008

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



MS. VIRGINIA ROBERTS  
NOTIFICATION OF IDENTIFIED VICTIM  
SEPTEMBER 3, 2008  
PAGE 2 OF 3

Special Master selected Robert Josefsberg, Esq. of the firm Podhurst Orseck, P.A., a highly-respected and experienced attorney. You are not obligated to use Mr. Josefsberg as your civil attorney, but, as explained in greater detail below, Mr. Josefsberg'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. Josefsberg, assuming that you would like Mr. Josefsberg 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. Josefsberg 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](mailto:ann.marie.c.villafana@usdoj.gov), or Justice Department Victim-Witness Specialist Twiler Smith at [Twiler.Smith@ic.fbi.gov](mailto:Twiler.Smith@ic.fbi.gov) with a good telephone number and/or e-mail address, so that we may provide Mr. Josefsberg with a timely means of communicating with you. If you would like to contact Mr. Josefsberg

MS. VIRGINIA ROBERTS  
NOTIFICATION OF IDENTIFIED VICTIM  
SEPTEMBER 3, 2008  
PAGE 3 OF 3

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.

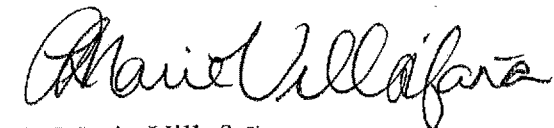
In addition, there has been litigation between the United States and two other victims regarding the disclosure of the entire agreement between the United States and Mr. Epstein. Mr. Josefsberg can provide further guidance on this issue, or if you select another attorney to represent you, that attorney 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:



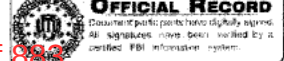
A. Marie Villafañá  
Assistant United States Attorney

cc: Robert Josefsberg, Esq.  
Jack Goldberger, Esq.

# EXHIBIT 31

## (Filed Under Seal)

## FEDERAL BUREAU OF INVESTIGATION



Date of entry 07/05/2013

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]  
[REDACTED] and via telephone, Assistant  
United States Attorney [REDACTED] GIUFFRE provided the  
following information:

b6  
b7C

GIUFFRE was born in Sacramento, California to parents [REDACTED]  
[REDACTED] date of birth [REDACTED]  
currently resides in [REDACTED] and [REDACTED] date of birth [REDACTED]  
[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.

b6  
b7C

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]

b6  
b7C

[REDACTED]

[REDACTED]  
[REDACTED] was training GIUFFRE to be an escort [REDACTED]  
[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

by [REDACTED]

b6  
b7C



31E-MM-108062

Continuation of FD-302 of Virginia L. Giuffre, On 03/17/2011, Page 2 of 12

like she was locked into the relationship. [REDACTED] gave GIUFFRE pharmaceutical drugs toward the end of their relationship.

b6  
b7C

[REDACTED]

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

b6  
b7C

[REDACTED]

[REDACTED] GIUFFRE felt that she was sent to [REDACTED] but did not know the specifics of the arrangement. GIUFFRE engaged in sexual activity with [REDACTED] who was described as a white male [REDACTED] GIUFFRE stated [REDACTED] GIUFFRE stayed with [REDACTED] 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 [REDACTED] Florida. GIUFFRE believed there was an FBI investigation related to [REDACTED] She never saw [REDACTED] again after [REDACTED]

b6  
b7C

In approximately June 1998 or 1999, GIUFFRE began working at Donald Trump's Mar-A-Lago Club in Palm Beach, Florida. GIUFFRE's father [REDACTED] 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 [REDACTED] and help her get her masseuse accreditation. [REDACTED]

b6  
b7C

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 [REDACTED]

31E-MM-108062

Continuation of FD-302 of Virginia L. Giuffre, On 03/17/2011, Page 3 of 12

[redacted] Florida. [redacted] spoke with GIUFFRE's father and told him it was a wonderful opportunity for GIUFFRE. GIUFFRE met [redacted] [redacted] also known as [redacted] GIUFFRE was led upstairs [redacted]

b6  
b7C

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

b6  
b7C

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

b6  
b7C

[redacted]  
[redacted]  
GIUFFRE was given instruction and began kissing [redacted]  
[redacted]

b6  
b7C

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

b6  
b7C

At the conclusion of the shower, GIUFFRE went downstairs and [redacted]  
[redacted]

b6  
b7C

Arrangements were made for GIUFFRE to return to the house the following day after work. GIUFFRE's cellular phone number was given to [redacted]  
[redacted]

31E-MM-108062

Continuation of FD-302 of Virginia L. Giuffre, On 03/17/2011, Page 4 of 12

The same routine and pattern of massages and sexual activity between [redacted] and GIUFFRE continued for between one and two weeks. At times, [redacted]

b6  
b7C

[redacted] offered GIUFFRE the option to quit her job at Mar-A-Lago and travel [redacted]. 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 [redacted] GIUFFRE met [redacted]

b6  
b7C

[redacted] and was introduced as [redacted] assistant.

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

b6  
b7C

Six to nine months after GIUFFRE began working for [redacted]

[redacted] GIUFFRE was introduced to [redacted] LNU, [redacted] in [redacted] Florida. [redacted] at the time. GIUFFRE met the couple at a condominium next to the [redacted]. The condominium was bought [redacted] and was a [redacted]. In the condominium, GIUFFRE provided a normal massage to [redacted] LNU. Shortly thereafter, [redacted] LNU [redacted] GIUFFRE provided an erotic massage to [redacted] GIUFFRE and [redacted]. GIUFFRE cleaned [redacted]. She was paid cash [redacted]. In addition, [redacted] paid GIUFFRE [redacted]. GIUFFRE was 16 years old at the time [redacted].

b6  
b7C

GIUFFRE advised [redacted] 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 [redacted] and others. Her habit went from two pills per day up to eight pills per day.

b6  
b7C

GIUFFRE's second client was an academic of some sort described as an older American male [redacted] sent GIUFFRE from Miami International Airport to [redacted] by commercial airline. GIUFFRE was picked up at the airport by [redacted] and then taken to the island by boat. GIUFFRE

b6  
b7C

31E-MM-108062

Continuation of FD-302 of Virginia L. Giuffre, On 03/17/2011, Page 5 of 12

pointed out that [REDACTED]  
[REDACTED] instructed GIUFFRE to entertain the  
client [REDACTED] and wanted  
to ride jet skis and participate in other island activities [REDACTED]  
[REDACTED] GIUFFRE spent two days on the island  
with the client. GIUFFRE assumes the client also traveled [REDACTED]  
commercially.

b6  
b7C

During the following several months, GIUFFRE traveled internationally  
[REDACTED] Prior to her traveling abroad, [REDACTED] assisted GIUFFRE in  
getting her passport. GIUFFRE got passport photographs of herself and  
provided them to [REDACTED] The remaining paperwork was taken care of by  
[REDACTED] 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 [REDACTED] GIUFFRE traveled on [REDACTED]  
[REDACTED] a black plane. During the international  
travel, [REDACTED] At  
times, GIUFFRE would [REDACTED]

b6  
b7C

[REDACTED]  
[REDACTED] Rarely a day would pass [REDACTED]  
[REDACTED]

[REDACTED] contacted GIUFFRE through  
[REDACTED]  
[REDACTED] and wanted to talk to GIUFFRE about [REDACTED]  
[REDACTED]  
[REDACTED] 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 [REDACTED] with detailed  
information [REDACTED]

b6  
b7Cb6  
b7Cb6  
b7C



FD-302a (Rev. 05-08-10)

31E-MM-108062

Continuation of FD-302 of Virginia L. Giuffre, On 03/17/2011, Page 6 of 12

[REDACTED]

[REDACTED]

b6  
b7C

[REDACTED] At age 16, GIUFFRE  
met [REDACTED]  
[REDACTED] GIUFFRE believed she and [REDACTED] were  
approximately the same age. GIUFFRE and [REDACTED]

b6  
b7C

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] GIUFFRE would dress  
[REDACTED]

b6  
b7C

[REDACTED]

[REDACTED]

b6  
b7C

[REDACTED] GIUFFRE, though [REDACTED] explained  
[REDACTED] GIUFFRE provided an  
[REDACTED] GIUFFRE described [REDACTED]

b6  
b7C

An unknown individual [REDACTED]  
[REDACTED] GIUFFRE saw [REDACTED] when she arrived at  
[REDACTED]  
[REDACTED] GIUFFRE had [REDACTED]  
GIUFFRE said that day was a low stage in her relationship  
because she could not believe [REDACTED]  
[REDACTED]  
[REDACTED] GIUFFRE never

b6  
b7C

31E-MM-108062

Continuation of FD-302 of Virginia L. Giuffre, On 03/17/2011, Page 7 of 12

saw [REDACTED] GIUFFRE believed the girls may have been [REDACTED] but  
GIUFFRE was not certain of [REDACTED] involvement.

b6  
b7C

GIUFFRE had a picture of herself she wanted to give [REDACTED]

b6  
b7C

GIUFFRE described some of the unique interior areas of [REDACTED]

b6  
b7C

[REDACTED] which GIUFFRE referred to [REDACTED]

[REDACTED] which was where

GIUFFRE stayed. [REDACTED]

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

b6  
b7C

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.

[REDACTED] LNU was [REDACTED] female that formerly lived in [REDACTED]

b6  
b7C

FD-302a (Rev. 05-08-10)

31E-MM-108062

Continuation of FD-302 of Virginia L. Giuffre, On 03/17/2011, Page 8 of 12

LNU and GIUFFRE went shopping together and purchased clothing and sex toys. GIUFFRE explained that [REDACTED]

b6  
b7C

b6  
b7C

GIUFFRE used a cellular telephone [REDACTED] She believed it was a New York City number but could not recall the number. GIUFFRE and [REDACTED]

GIUFFRE could only remember faces [REDACTED] not their names. GIUFFRE did not [REDACTED] but she did try unsuccessfully to get [REDACTED]

GIUFFRE recalled [REDACTED] but she could not recall the wording. [REDACTED] LNU. GIUFFRE advised [REDACTED]

b6  
b7C

GIUFFRE traveled [REDACTED] 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 [REDACTED] including the USVI, New York, Santa Fe, Palm Beach, France, Africa, Spain and the United Kingdom.

b6  
b7C

[REDACTED] GIUFFRE recalled visiting Alhambra Castle in Spain. [REDACTED] GIUFFRE eventually traveled to the United Kingdom and [REDACTED]

b6  
b7C

31E-MM-108062

Continuation of FD-302 of Virginia L. Giuffre, On 03/17/2011, Page 9 of 12

while there [redacted] 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 [redacted]

b6  
b7C

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

b6  
b7C

[redacted] GIUFFRE traveled to CLUB TRAMP [redacted] GIUFFRE danced [redacted] at CLUB TRAMP [redacted]

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

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

Approximately two months later, GIUFFRE met [redacted] at [redacted]

b6  
b7C

[redacted] GIUFFRE recalled [redacted]

[redacted] LNU, [redacted]

[redacted] GIUFFRE recalled [redacted] joking about trading GIUFFRE in because she was getting too old.



FD-302a (Rev. 05-08-10)

31E-MM-108062

Continuation of FD-302 of Virginia L. Giuffre, On 03/17/2011, Page 10 of 12

GIUFFRE recalled meeting [REDACTED]

b6  
b7C

[REDACTED] 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.

b6  
b7C

[REDACTED] did not have a problem with GIUFFRE using prescription drugs.

[REDACTED] was described by GIUFFRE as a

b6  
b7C

[REDACTED] (TRUE NAME UNKNOWN) [REDACTED]

[REDACTED] a ranch employee in [REDACTED] but GIUFFRE could not recall his name. She did have a photograph of the ranch employee.

b6  
b7C

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

b6  
b7C

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

b6  
b7C

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 [REDACTED] but never did. GIUFFRE met her future husband, [REDACTED] during her visit to Thailand. GIUFFRE contacted [REDACTED] telephonically and told him she had fallen in love with someone. [REDACTED]

b6  
b7C

31E-MM-108062

Continuation of FD-302 of Virginia L. Giuffre, On 03/17/2011, Page 11 of 12

GIUFFRE had not heard from [REDACTED]

[REDACTED] GIUFFRE received a telephone call from [REDACTED]. During that call, [REDACTED] stated he was an FBI agent. He was trying to determine what she knew about [REDACTED]. She did not tell [REDACTED] anything about her knowledge of [REDACTED]. 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 [REDACTED].

[REDACTED] 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.

b6  
b7C

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

b6  
b7C

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, [REDACTED]

Page 1, number 2, [REDACTED] LNU, a.k.a. [REDACTED]

Page 2, number 1, [REDACTED]

Page 2, number 6, [REDACTED]

Page 3, number 2, [REDACTED]

Page 4, number 3, [REDACTED] LNU

Page 4, number 7, [REDACTED]

Page 4, number 8, [REDACTED]

Page 5, number 1, [REDACTED]

b6  
b7C

GIUFFRE advised that the following were familiar to her, but she could not recall their names or her association to them:

31E-MM-108062

Continuation of FD-302 of Virginia L. Giuffre, On 03/17/2011, Page 12 of 12

Page 1, number 4

Page 2, numbers 7 and 8

Page 3, number 8

Page 4, number 1

Page 5, numbers 5 and 8

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 [REDACTED]

[REDACTED] The April 2001 CBP record was her return to the United States [REDACTED]

[REDACTED] GIUFFRE could not recall her travel from March and May 2001 CPB records. GIUFFRE advised that her United States Passport was turned over to the United States Consulate in Sydney, Australia.

b6  
b7C

On March 18, 2011, writer, SA [REDACTED] and [REDACTED] 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.

b6  
b7C


# EXHIBIT 32

## (Filed Under Seal)



 10.10  
MS Maxwell  
**VIRGINIA ROBERTS**

ALL MS. MAXWELL AT  
!!

  
**USE JOJO'S CELL PHONE**  
To MAKE THE



DANNY  
GEMMA DAISY

EXC. NANTICIDA THAPANDASO MAY

STILL BE IN THAPANDASO DURING YOUR  
STAY. IF SHE IS, SHE WILL BE  
STAYING AT THE SAME HOTEL.

# EXHIBIT 33

## (Filed Under Seal)



[REDACTED]  
Farmer, Jaffe, Weissing,  
Edwards, Fistos & Lehrman, P.L.

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 : [REDACTED]  
Dates Requested : January 1, 1998 ~ December 31, 2000 ✓  
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, FISTOS & LEHRMAN, P.L.

*A. Dishowitz*

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

RECEIVED  
JAN 06 2015

BY: \_\_\_\_\_

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



CONFIDENTIAL

GIUFFR003258





[REDACTED]  
Farmer, Jaffe, Weissing,  
Edwards, Fistos & Lehrman, P.L.

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 : [REDACTED]  
Dates Requested : January 1, 1998 - December 31, 2000 ✓  
Our File Number : [REDACTED]

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

*A. Dishowitz*

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

RECEIVED  
JAN 06 2015

BY: [REDACTED]

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



CONFIDENTIAL

GIUFFRE003259



DocType: EMERGENCY DEPT RECORD

NEW YORK-PRESBYTERIAN HOSPITAL  
New York Weill Cornell Medical Center



49125

ROBERTS, VIRGINIA L.

NURSING DOCUMENTATION SHEET  
EMERGENCY DEPARTMENT TRIAGE ASSESSMENT/DOCUMENTATION RECORD

Date: 9/1/01	Time: 5:25 pm	Name: Roberts, Virginia	Birth Date: [REDACTED]						
Immunizations: <input type="checkbox"/> Current <input type="checkbox"/> No (Physician notified)	<input type="checkbox"/> Emergent <input type="checkbox"/> Med <input type="checkbox"/> Mark ED	Medication Hx: <input type="checkbox"/> None <input type="checkbox"/> Over the counter <input type="checkbox"/> Unknown							
Tetanus: <input type="checkbox"/> < 5 yrs <input type="checkbox"/> > 5 yrs	<input type="checkbox"/> Urgent <input type="checkbox"/> Surg <input type="checkbox"/> UCC	BCP							
PMH: <input checked="" type="checkbox"/> None <input type="checkbox"/> Cardiac <input type="checkbox"/> MI <input type="checkbox"/> CVA <input type="checkbox"/> Diabetes <input type="checkbox"/> ESRD	<input type="checkbox"/> Non-Urgent <input type="checkbox"/> Peds <input type="checkbox"/> Psych								
<input type="checkbox"/> Respiratory <input type="checkbox"/> Seizures <input type="checkbox"/> Unknown Other:	Allergies: <input type="checkbox"/> Unknown <input type="checkbox"/> None	w/known							
Chief Complaint: No irregular vaginal bleeding x 3 wks c dyspnea, nausea, vomiting, sharp low abdominal pain									
Triage Interventions: <input type="checkbox"/> Ice <input type="checkbox"/> Elevation <input type="checkbox"/> Immobilization <input type="checkbox"/> Dressing <input type="checkbox"/> Respiratory Precautions <input type="checkbox"/> C-Collar <input type="checkbox"/> Security Watch									
<table border="1"> <tr> <td>24</td> <td>57</td> <td>102</td> <td>18</td> <td>103</td> <td>65</td> </tr> </table>				24	57	102	18	103	65
24	57	102	18	103	65				
Mental Status	Skin Color	Respirations	Skin Temp	Speech	ABO/Urinary				
<input checked="" type="checkbox"/> Alert <input type="checkbox"/> Oriented <input type="checkbox"/> Lethargic <input type="checkbox"/> Confused <input type="checkbox"/> Comatose <input type="checkbox"/> Hallucinations <input type="checkbox"/> Suicidal <input type="checkbox"/> Unresponsive	<input type="checkbox"/> Normal <input type="checkbox"/> Cyanotic <input type="checkbox"/> Pale <input type="checkbox"/> Flushed <input type="checkbox"/> Icteric <input type="checkbox"/> Rash <input type="checkbox"/> Vesicles <input type="checkbox"/> Hives	<input checked="" type="checkbox"/> Normal <input type="checkbox"/> Shallow <input type="checkbox"/> Labored <input type="checkbox"/> Dyspneic <input type="checkbox"/> Irregular	<input checked="" type="checkbox"/> Warm & Dry <input type="checkbox"/> Hot & Dry <input type="checkbox"/> Hot & Moist <input type="checkbox"/> Cool & Moist	<input checked="" type="checkbox"/> Coherent <input type="checkbox"/> Incoherent <input type="checkbox"/> Slurred <input type="checkbox"/> Aphasic <input type="checkbox"/> Mute	<input type="checkbox"/> Pain Location: Low abd pain <input type="checkbox"/> Last BM <input type="checkbox"/> Nausea <input checked="" type="checkbox"/> Vomiting <input type="checkbox"/> Diarrhea <input type="checkbox"/> Urinary Complaints: <input type="checkbox"/> Retention <input type="checkbox"/> Frequency <input type="checkbox"/> Urgency <input type="checkbox"/> Hematuria				
Gyn: <input type="checkbox"/> NA <input type="checkbox"/> Gravid: <input type="checkbox"/> Para: <input type="checkbox"/>	LMP: ~ 10/1/00 <input type="checkbox"/> Normal <input type="checkbox"/> Prolonged <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure	Pain Location: <input type="checkbox"/> Bleeding <input checked="" type="checkbox"/> Gross <input type="checkbox"/> Clotting <input type="checkbox"/> Vaginal Discharge <input type="checkbox"/> Color: <input type="checkbox"/>	Time In: 6:45	Room # 6 South					
Upt 6. pt. 90 lower abd pain, 1 discharge. Abdomen soft, non-distended skin w/d									

49125 (7/09)

CHART COPY

ed by DIN9011

Page 1

01-05-2015 21:15:54

CONFIDENTIAL

GIUFFRE003260

49125

ROBERTS, VIRGINIA L.

ed by DIN 8011

DocType: EMERGENCY DEPT RECORD

NEW YORK-PRESBYTERIAN HOSPITAL  
New York Weill Cornell Medical Center



49125

EMERGENCY NOTES, Continuation  
EMERGENCY DEPARTMENT

Roberts, Virginia  
IF NO PLATE, PRINT NAME, SEX AND HISTORY NO.

7/9/01  
10 pm

18-yr. G. Roberts LMP 6/9/01 presents abd pain, N/V, HA, <sup>since last night</sup> <sup>6 hrs</sup> intermittent, for 3 wks, brown vaginal discharge + 3 wks. (3 pads/day) + episode of fainting 2 days ago where she fell and hit her head. It has 6/6 lower abd pain, sharp, intermittent. @ back pain 6/6. Dysuria, urgency @ dyspareunia (w/ deep penetration) @ bright red blood per vagina last BM 2 days ago @ BRADP @ mucous 1.00 intake x 2 days, lost 7 lbs this month, ++ appetite partner has no symptoms.

hxm - 4 x irregular x 5 days - 2 wks, severe menstrual cramps, on OCP x 9 mos but period still irregular  
h/o ovarian cysts? Endometriosis @ fibroids  
STD's, sexually active same partner x 2 yrs.  
Carolyn Steinberg is PMH

PMH -  $\phi$   
PSH -  $\phi$   
Soc Hx -  $\phi$  EtOH  $\phi$  tobacco  $\phi$  drugs  
Fam Hx - Breast CA mother, aunt  
VS - T 97.8 BP 103/85 P 102 R 18  
Chest - CTA 6/6  
Cv - RHR 152  
Abd - soft, 6/6 mod tenderness RLQ+LLQ, generalized tenderness to palpation @ rebound @ guarding  
Ext -  $\phi$  6/6  
Pelvic -  $\phi$  6/6 <sup>mod white discharge in vag vault, 05 dated, @ VUS</sup> <sup>Back -  $\phi$  CVA tenderness</sup> <sup>uterus not palpable 2° to discomfort</sup>  
Labs - 

13.2	13.2	13.2	13.2	13.2	13.2
8.2	38.2	27.2	3.6	2.1	0.5

<sup>u/A 0-2 RBC, 0-2 WBC</sup> <sup>dk yellow, intstz @, leuk est @</sup>  
Spec - <sup>HPV 2.5 cm</sup> <sup>ovaries appear normal</sup> <sup>GC/chlamydia sent</sup>  
@ ovary 4.5 x 4.0 cm @ ovary 4.5 x 1.7 cm <sup>UT @ T+S AC</sup>  
@ free fluid @ cul de sac  
@ <sup>diarrhea -  $\phi$  6/6</sup> <sup>Slide - epith cells,  $\phi$  blue cells</sup>  
@ <sup>18-yr. G. & abd pain, N/V, <sup>diarrhea -  $\phi$  6/6</sup> <sup>trichomonads</sup></sup>

Possible ruptured ~~ovarian cyst~~ vs. R/o appendicitis vs. gastroenteritis  
@ <sup>abdominal pain</sup> <sup>Don't P/B as pt is afebrile and no WBC's.</sup>  
Recommend getting CT scan or official <sup>transvaginal AM</sup>  
PMH in GYN clinic - Dr. <sup>7/13/01 @ 2:30pm</sup> <sup>PMH cultures</sup>  
Return if symptoms worsen, fever, severe abd pain  
Pending results of CT scan, may give Ceftriaxone 250mg IM qid  
and Acetaminophen 1 gm PO q 4h

49125 (R35) MEDICAL RECORD

ed by DIN9011

Page 3

01-06-2015 21:16:54

CONFIDENTIAL

GIUFFR003262

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

49125

**EMERGENCY NOTES, Continuation**  
**EMERGENCY DEPARTMENT**

Robert, Virginia

Green PG4-2 addendum

18 y/o G. Paoio LMP 6/9/01 2 subs of generalized periumbilical & pelvic pain, worsening over this time, (1) nausea (1) emesis x 1 day, (1) diarrhea, (1) urinary ex. monog. relationship x 2 yrs, 106/0 STD 5/00 Plakobrite in ED, USS

Abd soft, ⊕ BS, ⊕ RLQ & LLQ TTP, ⊕ R/G, ♀ masses  
SSE: as closed ⊕ white dk, ♀ blood

VE: generalized discomfort to exam, B/L  
LO tenderness, B/L adnexal tenderness, discomfort  
on palpation of uterus, mild CMV.

EP Como: ukuran  $\delta$  kivi EMS 2-3mm

4 ov 4 cm x 1.5 cm 2 mult + follicles

Row 4. 2 cm x 1-7 cm  $\approx$  mult follicles

trace FF in CDS, masses seen

• discomfort during exposure

wet prep:  $\phi$  chel cells, rare  $\phi$  B.C.'s

8.2) 3.5 WPT

A/P: 18 y/o ♀ = abd pain, @ N/V/D, afebrile + NL  
sonot + WBC. Doubt PID given afebrile, NL WBC, @ wet  
prep. Possible etiologies include ruptured ovary  
given trace FF. Would also v/o appendicitis  
consider other GI pathology given GI Sx's.

Doubt acute Cyn pathology at this time

Will treat prophylactically w/ pelvic discaust  
and CRT on pelvic exam likely 2° peritoneal  
irritation.

Will treat prophylactically  $\pm$  Ceftriaxone

250 me  $IT$   $\times T$  and  $2100$   $19$   $PO \times T$

Would hammer CT Abd/Pelvis

- have discussed  $\Sigma$  Dr Palermo and Dr. Charles -

Rawlins

40125 (2/30) - pt to H.A. In Gyn Clinic on 7/13/01

- Defect if fuel worsening ex.

Part 4072

MEDICAL RECORD

ed by D|N9011

Page 4

01-06-2015 21:16:54

CONFIDENTIAL

GILFRE003263



Standard Register ® JUNE 1976

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466
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49125

**EMERGENCY NURSING FLOW SHEET**  
**EMERGENCY DEPARTMENT**

IF NO PLATE, PRINT NAME, SEX AND MEDICAL RECORD NO.

ed by DIN 9011

DocType: EMERGENCY DEPT RECORD

NEWYORK-PRESBYTERIAN HOSPITAL  
New York Weill Cornell Medical Center



48125

EMERGENCY NOTES, Continuation  
EMERGENCY DEPARTMENT

Roberts, Virginia

IF NO PLATE, PRINT NAME, SEX AND HISTORY NO.

7/11/01  
Pt. called for GC/diagnostic and urine cytology  
results - Reported to pt. as negative. R. Brought ANP

48125 (2/98)

371 146

MEDICAL RECORD

ed by DIN9011

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01-08-2015 21:16:54

CONFIDENTIAL

GIUFFRE003265

DocType: PROGRESS NOTES

NEW YORK-PRESBYTERIAN HOSPITAL  
New York Weill Cornell Medical Center



45104

Virginia Roberts

## PROGRESS NOTES

IF NO PLATE, PRINT NAME, SEX AND MEDICAL RECORD NO

DATE (MO., DT., YR.)	LOCATION	SERVICE	AGE	DOCTOR
7.10.01	Internal Med			
<p>18yo f c N/V / abdominal pain / vag bleeding. Saw pt in office 7.9 pm. 3 weeks of vaginal spotting, 2 days prior to 7.2<sup>3</sup>, N/V x 12 hours. Pt in office, BP 90/palp c pulse 126-130. CMT on exam. Sent to ER for IV hydration &amp; GYN w/u. Pt refused IVF in ER. GYN w/u per note indicated A pulse w/8. CT also done - reported "normal." Pt has no localizing S/S on exam &amp; CMT. Likely has cervicitis &amp; 2/0 PID or studies. Agree c propylactic Rx for Chlamydia &amp; G/C while cultures are @. Can Rm c me in my office 7/11 or 7/12.</p> <p><i>[Signature]</i> ST170 X64015</p>				

45104 (Rev)



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01-06-2015 21:17:03

CONFIDENTIAL

GIUFFRE003266

DocType: LAB REPORTS

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

NY 100210000

Client#: 00000

NEW YORK HOSPITAL

Req#:

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

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
<u>COMPLETE BLOOD COUNT</u>				
WBC		8.2	3.4-11.2	K/uL
RBC		4.23	3.80-5.20	M/uL
HGB		13.2	11.7-16.0	g/dL
HCT		38.2	35.0-47.0	%
MCV		90.3	81.0-100.0	fL
MCH		31.2	27.0-34.0	pg
MCHC		34.6	32.0-36.0	g/dL
RDW		12.6	11.0-14.0	%
PLATELET		272.0	150.0-450.0	K/uL
MPV		10.4	6.0-12.0	fL
<u>AUTOMATED DIFFERENTIAL</u>				
NEUT %	83.4 H		45.0-75.0	%
LYMPH %	8.1 L		20.0-50.0	%
MONO %		7.6	2.0-11.0	%
EOS %		0.5	0.0-5.0	%
BASO %		0.4	0.0-1.0	%
NEUT ABS	6.8 H		2.1-4.9	K/uL
LYMPH ABS	0.7 L		1.4-2.8	K/uL
MONO ABS		0.6	0.2-0.9	K/uL
EOS ABS		0.0	0.0-0.3	K/uL
BASO ABS		0.0	0.0-0.1	K/uL

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CONFIDENTIAL

GIUFFRE003267



 DocType: LAB REPORTS

L=LOW, H=HIGH

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CONTINUED

OUTPATIENT REPORT



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CONFIDENTIAL

GIUFFRE003268

DocType: LAB REPORTS

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

Patient Name: ROBERTS, VIRGINIA L.

CLIENT INFORMATION:

EMOND, STEPHEN D MD

525 East 68th Street

New York

NY 100210000

Client#: 00000

NEW YORK HOSPITAL

Coll Date: 07/09/2001

Recvd Date: 07/09/2001

Rpt Date: 07/10/2001

Coll Time: 1911

Recvd Time: 1911

Rpt Time: 0438

FINAL

<u>TEST NAME</u>	<u>ABNORMAL</u>	<u>NORMAL</u>	<u>REFERENCE</u>	<u>UNITS</u>
<u>ROUTINE CHEMISTRY</u>				
<u>AMYLASE</u>		<u>46</u>	<u>15-127</u>	<u>U/L</u>

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CONTINUED

OUTPATIENT REPORT



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CONFIDENTIAL

GIUFFRE003269

DocType: LAB REPORTS

Patient Name: ROBERTS, VIRGINIA L.

Med Rec #: [REDACTED]

Date of Birth: [REDACTED] Sex: F

100210000

Req#|||

## CLIENT INFORMATION:

EMOND, STEPHEN D MD  
525 East 68th Street  
New York NYClient#: 00000  
NEW YORK HOSPITALColl Date: 07/09/2001  
07/10/2001

Coll Time: 1911

Recvd Date: 07/09/2001

Recvd Time: 1911  
FINAL

Rpt Date:

Rpt Time: 0438

CANCELLED TESTSPROCEDUREDRAWN DATEREASONBASIC METABOL PANEL  
Order Entry Error07/09/01Page: 3  
END OF CHART

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01-06-2015 21:17:11

DocType: LAB REPORTS

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

Patient Name: ROBERTS, VIRGINIA L.  
 Med Rec #: [REDACTED]

Req#:

CLIENT INFORMATION:  
EMOND, STEPHEN D MD  
525 East 68th Street  
New York NY 100210000  
Client#: 00000  
NEW YORK HOSPITAL

Coll Date: 07/09/2001      Recvd Date: 07/09/2001      Rpt Date: 07/10/2001  
Coll Time: 1855      Recvd Time: 1913      Rpt Time: 0438  
FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
<u>MACROSCOPIC URINALYSIS</u>				
<u>COLOR</u>		<u>DK YELLO</u>	<u>YELLOW</u>	
<u>APPEARANCE</u>		<u>CLEAR</u>	<u>CLEAR</u>	
<u>PROTEIN</u>	<u>30+</u>		<u>NEGATIVE</u>	
<u>BLOOD</u>		<u>NEGATIVE</u>	<u>NEGATIVE</u>	
<u>GLUCOSE</u>		<u>NEGATIVE</u>	<u>NEGATIVE</u>	
<u>KETONES</u>	<u>TRACE+</u>		<u>NEGATIVE</u>	
<u>pH</u>		<u>7.0</u>	<u>4.6-8.0</u>	
<u>BILIRUBIN</u>		<u>NEGATIVE</u>	<u>NEGATIVE</u>	
<u>SP GRAVITY</u>		<u>1.025</u>	<u>1.005-1.030</u>	
<u>NITRATE</u>		<u>NEGATIVE</u>	<u>NEGATIVE</u>	
<u>LEUKOCYTE ESTER</u>		<u>NEGATIVE</u>	<u>NEGATIVE</u>	

<u>MICROSCOPIC URINALYSIS</u>				
<u>NOTE</u>		<u>SEE NOTE#</u>		
<u>RBC/HFF</u>		<u>0-2</u>	<u>0-2</u>	
<u>WBC/HFF</u>		<u>0-2</u>	<u>0-2</u>	
<u>RENAL EPIH</u>		<u>NEGATIVE</u>	<u>NEGATIVE</u>	

NOTE (09/06/2000 -- Current)

THIS URINE HAS BEEN EXAMINED FOR WBC, RBC, CASTS, CRYSTALS AND  
EPITHELIAL CELLS. ANY OF THESE ELEMENTS NOT REPORTED WAS NOT FOUND.



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CONFIDENTIAL

GIUFFR003271



 DocType: LAB REPORTS

t=ABNORMAL, f=FOOTNOTE

Page: 1  
END OF CHART



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CONFIDENTIAL

GIUFFRE003272

DocType: LAB REPORTS

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 NY 100210000  
Client#: 00000  
NEW YORK HOSPITAL

Coll Date: 07/09/2001  
Coll Time: 1915

Recvd Date: 07/09/2001  
Recvd Time: 1925

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

FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
<u>ROUTINE CHEMISTRY</u>				
<u>GLUCOSE</u>	<u>115</u> <u>H</u>		<u>70-105</u>	<u>mg/dL</u>
<u>UREA NITROGEN</u>		<u>8</u>	<u>5-25</u>	<u>mg/dL</u>
<u>CREATININE</u>		<u>0.8</u>	<u>0.5-1.5</u>	<u>mg/dL</u>
<u>SODIUM</u>		<u>138</u>	<u>133-147</u>	<u>mmol/L</u>
<u>POTASSIUM</u>		<u>3.6</u>	<u>3.2-5.2</u>	<u>mmol/L</u>
<u>CHLORIDE</u>		<u>103</u>	<u>94-110</u>	<u>mmol/L</u>
<u>CO2</u>	<u>21</u> <u>L</u>		<u>22-32</u>	<u>mmol/L</u>
<u>ANION GAP</u>		<u>14</u>	<u>05-17</u>	
<u>URIC ACID</u>		<u>3.2</u>	<u>2.5-7.5</u>	<u>mg/dL</u>
<u>CALCIUM</u>		<u>9.0</u>	<u>8.5-10.5</u>	<u>mg/dL</u>
<u>PHOSPHORUS</u>		<u>3.4</u>	<u>2.2-4.2</u>	<u>mg/dL</u>
<u>PROTEIN, TOTAL</u>		<u>7.7</u>	<u>5.5-8.0</u>	<u>g/dL</u>
<u>ALBUMIN</u>		<u>4.3</u>	<u>3.0-5.0</u>	<u>g/dL</u>
<u>GLOBULIN</u>	<u>3.4</u> <u>H</u>		<u>1.8-3.3</u>	<u>g/dL</u>
<u>BILIRUBIN TOT</u>		<u>0.7</u>	<u>0.2-1.3</u>	<u>mg/dL</u>
<u>BILIRUBIN DIR</u>		<u>0.2</u>	<u>0.1-0.4</u>	<u>mg/dL</u>
<u>BILIRUBIN IND</u>		<u>0.5</u>	<u>0.1-0.8</u>	<u>mg/dL</u>
<u>CHOLESTEROL</u>		<u>130</u> <u>F</u>	<u>&lt; 200</u>	<u>mg/dL</u>
<u>MAGNESIUM</u>		<u>1.6</u>	<u>1.5-1.9</u>	<u>mEq/L</u>
<u>AST</u>		<u>30</u>	<u>0-45</u>	<u>U/L</u>
<u>ALT</u>		<u>13</u>	<u>0-45</u>	<u>U/L</u>

CHOLESTEROL (03/17/1999 - Current)



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CONFIDENTIAL

GIUFFRE003273

DocType: LAB REPORTS

DESIRABLE: <200 mg/dL  
BORDERLINE HIGH: 200-239 mg/dL  
HIGH: >=240 mg/dL

L=LOW, H=HIGH, f=FOOTNOTE

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CONTINUED

OUTPATIENT REPORT



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CONFIDENTIAL

GIUFFRE003274

DocType: LAB REPORTS

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

Patient Name: ROBERTS, VIRGINIA L.

## CLIENT INFORMATION:

EMOND, STEPHEN D MD

525 East 68th Street

New York

NY 100210000

Client#: 00000

NEW YORK HOSPITAL

Coll Date: 07/09/2001

Recvd Date: 07/09/2001

Rpt Date: 07/10/2001

Coll Time: 1915

Recvd Time: 1925

Rpt Time: 0438

FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
ROUTINE CHEMISTRY				
LD		163	80-225	U/L
ALKALINE PHOS		76	30-110	U/L
CORONARY RISK				
CHOLESTEROL		130	< 200	mg/dL

DESIRABLE: &lt;200 mg/dL

BORDERLINE HIGH: 200-239 mg/dL

HIGH: &gt;=240 mg/dL



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CONFIDENTIAL

GIUFFRE003275



DocType: LAB REPORTS

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END OF CHART



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CONFIDENTIAL

GIUFFRE003276

DocType: LAB REPORTS

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

NY 100210000

Reg#:

Client#: 00000

NEW YORK HOSPITAL

Coll Date: 07/09/2001

Recvd Date: 07/09/2001

Rpt Date: 07/10/2001

Coll Time: 1934

Recvd Time: 1934

Rpt Time: 0438

FINAL

TEST NAMEABNORMALNORMALREFERENCE UNITSSENDOUT CULTURESBLOOD GROUP AND TYPE

PROCEDURE: ABO RH

07/09/2001 1934

A POS

ANTIBODY SCREEN AND WORKUP

PROCEDURE: ABSC INT

07/09/2001 1934

NOTIMMED



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CONFIDENTIAL

GIUFFRE003277

 DocType: LAB REPORTS

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CONFIDENTIAL

GIUFFRE003278

DocType: LAB REPORTS

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 NY 100210000  
Client#: 00000  
NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/10/2001 Rpt Date: 07/11/2001  
Coll Time: 0941 Recvd Time: 0941 Rpt Time: 0452  
FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
-----------	----------	--------	-----------	-------

CHLAMYDIA-GC BY AMPLIFICATION	GC-CHLAMYDIA			
CHLA SWAB SOURC	CERVIX			
CHLA SWAB	NEGATIVE		NEGATIVE	
GC SWAB SOURCE	CERVIX			
GC SWAB	NEGATIVE		NEGATIVE	

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END OF CHART



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CONFIDENTIAL

GIUFFRE003279



DocType: LAB REPORTS

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

NY 100210000

Client#: 00000

NEW YORK HOSPITAL

Coll Date: 07/09/2001  
 Coll Time: 1929

Recvd Date: 07/10/2001  
 Recvd Time: 0941

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

PARTIAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
-----------	----------	--------	-----------	-------

GENITAL: CULTURE-SCREEN

GENITAL CULTURE  
 SOURCE: CERVIX  
 FREETEXT SOURCE:

COLLECTED: 07/09/01 1929  
 RECEIVED: 07/10/01 0941  
 STARTED: 07/10/01 0941

ACCESSION: 01-EE-01-045532

STAINS & PREPS

07/10/2001 1342

MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLIMODERATE EPITHELIAL CELLSMODERATE WBC SEEN

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END OF CHART



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CONFIDENTIAL

GIUFFRE003280

DocType: LAB REPORTS

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 NY 100210000  
Client#: 00000  
NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/10/2001 Rpt Date: 07/12/2001  
Coll Time: 1929 Recvd Time: 0941 Rpt Time: 0532  
PARTIAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
-----------	----------	--------	-----------	-------

GENITAL CULTURE-SCREEN

GENITAL CULTURE	COLLECTED: 07/09/01 1929
SOURCE: CERVIX	RECEIVED: 07/10/01 0941
FREETEXT SOURCE:	STARTED: 07/10/01 0941
ACCESSION#: C1-MB-01-045532	

\*\*\* 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



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CONFIDENTIAL

GIUFFRE003281

 DocType: LAB REPORTS

Page: 1  
END OF CHART



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CONFIDENTIAL

GIUFFRE003282

DocType: LAB REPORTS

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

CLIENT INFORMATION:  
 EMOND, STEPHEN B MD  
 525 East 68th Street  
 New York NY 100210000  
 Client#: 00000  
 NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/10/2001 Rpt Date: 07/12/2001  
 Coll Time: 1855 Recvd Time: 1102 Rpt Time: 0532  
 FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
-----------	----------	--------	-----------	-------

## URINE CULTURE

URINE CULTURE	COLLECTED: 07/09/01 1855
SOURCE: URINE CLEAN CATCH	RECEIVED: 07/10/01 1102
FREE TEXT SOURCE:	STARTED: 07/10/01 1102

ACCESSION#: 01-MB-01-045573

FINAL REPORT

07/11/2001 1323

NO GROWTH (&lt;1,000 CFU/ML)

Page: 1  
 END OF CHART



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CONFIDENTIAL

GIUFFRE003283

DocType: LAB REPORTS

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 NY 100210000  
 Client#: 00000  
 NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/10/2001 Rpt Date: 07/13/2001  
 Coll Time: 1929 Recvd Time: 0941 Rpt Time: 0541

PARTIAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
-----------	----------	--------	-----------	-------

GENITAL: CULTURE- SCREEN

GENITAL CULTURE	COLLECTED: 07/09/01 1929
SOURCE: CERVIX	RECEIVED: 07/10/01 0941
FREETEXT SOURCE:	STARTED: 07/10/01 0941
ACCESSION#: 01-MB-01-045532	

STAINS & PREPS

07/10/2001 1343

MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLIMODERATE EPITHELIAL CELLSMODERATE WBC SEENPRELIMINARY REPORT

07/11/2001 1037

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITHLACTOBACILLICULTURE BEING HELD FOR FURTHER EVALUATION

07/12/2001 1130

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITHLACTOBACILLICULTURE BEING HELD FOR FURTHER EVALUATION

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CONFIDENTIAL

GIUFFRE003284



DocType: LAB REPORTS

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END OF CHART



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CONFIDENTIAL

GIUFFRE003285

DocType: LAB REPORTS

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

Patient Name: ROBERTS, VIRGINIA L.  
 Med Rec #: [REDACTED]

CLIENT INFORMATION:  
 EMOND, STEPHEN D MD  
 525 East 68th Street  
 New York NY 100210000  
 Client#: 00000  
 NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/10/2001 Rpt Date: 07/14/2001  
 Coll Time: 1929 Recvd Time: 0941 Rpt Time: 0431  
 FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
-----------	----------	--------	-----------	-------

# GENITAL: CULTURE-SCREEN

GENITAL CULTURE	COLLECTED: 07/09/01 1929
SOURCE: CERVIX	RECEIVED: 07/10/01 0941
FREETEXT SOURCE:	STARTED: 07/10/01 0941
ACCESSION# 01-MB-01-045532	

## 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

07/12/2001 1130

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

ad by DIN9011

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CONFIDENTIAL

GIUFFRÉ003286

 DocType: LAB REPORTS

LACTOBACILLI

NO NEISSERIA GONORRHEAE ISOLATED

Page: 1  
END OF CHART



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CONFIDENTIAL

GIUFFRE003287

DocType: ORDERS

**NEW YORK-PRESBYTERIAN HOSPITAL**  
 New York Weill Cornell Medical Center


45171

 ROBERTS, VIRGINIA L.  
 [Redacted]

**DIAGNOSTIC PROCEDURE ORDER FORM**

- (1) **MD/NP:** Indicate test(s) to be performed by checking appropriate box or completing the section "Other Procedure Not Listed". Indicate priority rating for each and complete Clinical Data Section Sign order form.
- (2) **Unit Clerk:** Fax this form to appropriate test area(s) and complete the following:  
 Date Faxed \_\_\_\_\_ Time \_\_\_\_\_ Clerk Initials \_\_\_\_\_
- (3) **Test Area:** Call the Clerk and provide date(s) and time(s) test(s) will be done.  
**Unit Clerk:** Write the Date and Time, as provided by test area, onto this form.
- (4) **Unit Clerk:** Follow current procedure for posting order on unit and place form in medical record.
- (5) **RN:** Verify order and sign on designated line.
- (6) **Perioperative Radiology:** Do not test form. Please use to request exam. Give yellow copy to Tech.

P Indicates Prep. is required. C Indicates WRITTEN CONSENT is Required

Time Blocks: A=8A-12N B=12N-5P C=5P-8A	CARDIOLOGY	PRIORITY 1, 2 or 3	FAX	TO BE DONE DATE	TIME
	<input type="checkbox"/> Echo <input type="checkbox"/> PORT		88701		
	<input type="checkbox"/> EKG <input type="checkbox"/> PORT		88701		
	<input type="checkbox"/> Signal Average EKG		88701		
	<input type="checkbox"/> Holter Monitor		88701		
	<input type="checkbox"/> E.T.T.		88701		
	<b>PULMONARY</b>				
	<input type="checkbox"/> PFTs		88808		
	<b>NEUROLOGY</b>				
	<input type="checkbox"/> DOPPLER:		88884		
	<input type="checkbox"/> CAROTID		88884		
	<input type="checkbox"/> TRANSCRANIAL		88884		
	<b>NUCLEAR MEDICINE</b>				
	<input type="checkbox"/> Bone Scan P		88873		
	<input type="checkbox"/> Gallium P		88873		
	<input type="checkbox"/> Biliary P		88873		
	<input type="checkbox"/> DPX P		88873		
	<input type="checkbox"/> Renal P		88873		
	<input type="checkbox"/> VQ P		88873		
	<input type="checkbox"/> RMCA		88873		
	<input type="checkbox"/> Thallium		88873		
	<input type="checkbox"/> Thyroid				

**OTHER PROCEDURES NOT LISTED:**

x10 App

**CLINICAL DATA**

- ☐ Consent Obtained
- ☐ Respiratory Precautions
- ☐ Wound/Skin Precautions
- ☐ Pregnancy

☐ Pediatric Patient: for Pediatric Radiology (M-F 8am - 4pm) fax to 80198  
 for Pediatric Cardiology fax to 88373

☐ Pre-Op Date of Surgery

Clinical History

For Contrast Studies: BUN

Creat.

Ordering Physician/NP

Date 7/10/19

Time 1230 AM

Attending MD

ID Code

Beeper #

RN Signature

RN

CHART COPY

UNIT: ROOM: #

PRIORITY RATING: 1 = EMERGENCY / STAT 2 = URGENT / STAT 3 = ROUTINE

RADIOLOGY PRIORITY 1, 2 or 3 FAX TO BE DONE DATE TIME

☐ Abdomen ☐ Flat ☐ Erect 28093

☐ CXR 28093

☐ Flat ☐ Right ☐ Left 28093

☐ Hand ☐ Right ☐ Left 28093

☐ Arm ☐ Right ☐ Left 28093

☐ Pelvis 28093

☐ Ribs 28093

☐ Spine ☐ Cervical 28093

☐ Mammogram 28093

☐ Portable 28093

**FLUOROSCOPY**

☐ Ba E P 28093

☐ IVP C,P 28093

☐ Small Bowel Series P 28093

☐ UGI Series P 28093

**SONOGRAPHY**

☐ Abdomen P 80137

☐ OB/GYN P 80137

☐ Pelvis P 80137

☐ Scrotum P 80137

☐ Thyroid P 80137

☐ Renal P 80137

☐ Head P 80137

☐ Other ☐ Bowel P 80137

**CAT SCAN C,P**

☐ Head 88080

☐ Cervical Spine 88080

☐ Thoracic Spine 88080

☐ Lumbar Spine 88080

☐ Chest 88044

☐ Abdomen 88044

☒ Pelvis 88044

\* ☐ With Contrast - P. Requires HPO 4 ml. Requires BUN & Creat.

**MRI**

☐ Extremity 88046

☐ Head 88046

☐ Spine 88046

☐ With GAD 88046

44320 (2/86)

ed by DIN9011

Page 1

01-05-2015 21:17:22

CONFIDENTIAL

GIUFFRE003288

DocType: ORDERS

**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 Ancillary Services section in this manual. The procedure in the manual contains a brief description, indications, contraindications, patient preps and special instructions.

Please call Pediatric Radiology x62554 for modified preps 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. Suspend all medication except essential.

Antispasmodics 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 6 PM day before study.

4 bisacodyl tablets (Dulcolax) by mouth at 10 PM the night 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 NPO for at least 4 hours prior to study. Patients must be cooperative and able to hold their breath for Body CT's.

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 MRI's. ④ Claustrophobia and inability to remain still are also contraindication 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 sedation is absolutely necessary in the restless patient.
2. For biliary, meckel's, cardiac, and any studies requiring sedation, 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 (Lugol's Potassium Iodide, Kelp): 1-2 weeks  
 Seafood, Ovaltine, vitamin pills, Oranide, Combidi: 3-5 days  
 Diodrast, Hypaque (i.e., IVP's 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 radiiodine treatment, consultation is advised.  
 Thyroid substance (i.e., desiccated thyroid, Thyroxine): 4 weeks  
 Tri-iodothyronine (Cytomel): 10-12 days.  
 If special circumstances require evaluation despite the above indications (contraindications) Nuclear Medicine physician consultation advised.



ed by DIN9011

Page 2

01-06-2015 21:17:22



DocType: ORDERS

**NEW YORK-PRESBYTERIAN HOSPITAL**  
 New York Weill Cornell Medical Center


45171

**PHYSICIAN'S ORDERS**  
**EMERGENCY DEPARTMENT**
**ROBERTS, VIRGINIA L.**

IF NO PLATE, PRINT NAME, SEX AND MEDICAL RECORD NO.

Date: 7/9/01	Time: 19:00	Diagnosis:
<b>Allergies:</b> Vital Signs: <input type="checkbox"/> Routine <input type="checkbox"/> q 1 hour <input type="checkbox"/> q 15 minutes Activity: <input type="checkbox"/> Routine <input type="checkbox"/> Bedrest Diet: <input type="checkbox"/> Regular <input type="checkbox"/> NPO <input type="checkbox"/> Other: IV: <input type="checkbox"/> Heptlock <input type="checkbox"/> Fluids: Oxygen: <input type="checkbox"/> Nasal Cannula <input type="checkbox"/> Umin <input type="checkbox"/> Face Mask <input type="checkbox"/> % Precautions: <input type="checkbox"/> Airborne <input type="checkbox"/> Droplet <input type="checkbox"/> Wound/Skin Other: <input type="checkbox"/> Cardiac Monitor <input type="checkbox"/> ECG <input type="checkbox"/> Foley Catheter <b>Labs (circle):</b> CBC/diff/pla <input checked="" type="checkbox"/> Retic. Ct. <input type="checkbox"/> PT/PTT Lymes/BUN/Cr <input type="checkbox"/> Glucose <input type="checkbox"/> Ca Mg <input type="checkbox"/> Amylase Admission Profile <input type="checkbox"/> LFTs <input type="checkbox"/> Cardiac Enzymes <input type="checkbox"/> ESR ETOH level <input type="checkbox"/> Aspirin level <input type="checkbox"/> Acetaminophen level <input type="checkbox"/> Tox. Screen UA <input type="checkbox"/> Urine C & S <input type="checkbox"/> Urine HCG <input checked="" type="checkbox"/> Serum HCG Type & Screen <input type="checkbox"/> Type & Cross <input type="checkbox"/> Units <input type="checkbox"/> Other:		
<b>Medications, etc.:</b> <input type="checkbox"/> Tetanus & Diphtheria Toxoids 0.5 cc. IM PHYSICIAN'S SIGNATURE: <i>Ben Huford</i> MD CODE: H0051 PICKED UP BY NURSE: <i>De Cesare</i> DATE: TIME: DATE: 7/9 TIME: DONE IN ED: LR - 1L with open Non 125 cc/hr <input checked="" type="checkbox"/> Modem 800mg PO x1 <input checked="" type="checkbox"/> Folic 2mg PO x1 <input checked="" type="checkbox"/> Tylenol 650 PO x1 <input checked="" type="checkbox"/> PHYSICIAN'S SIGNATURE: <i>Ben Huford</i> MD CODE: H0051 PICKED UP BY NURSE: DATE: 7/9 TIME: 00:00 DATE: 7/10 TIME: 12:40pm DONE IN ED: 15 cc fentanyl in 1 L H <sub>2</sub> O <input checked="" type="checkbox"/> for PHYSICIAN'S SIGNATURE: <i>Ben Huford</i> MD CODE: H0051 PICKED UP BY NURSE: DATE: 7/10 TIME: 12:00 DATE: 7/10 TIME: 12:54pm DONE IN ED: Ceftriaxone 250mg IM x1 <input type="checkbox"/> refused Azithromycin 1gram PO x1 <input checked="" type="checkbox"/> given for acute pharyngitis PHYSICIAN'S SIGNATURE: <i>Ben Huford</i> MD CODE: H0051 PICKED UP BY NURSE: <i>My [unclear]</i> DATE: 7/10 TIME: 17:00		

50385 (6/99)

✓ = Done in Emergency Department

ed by DIN0011

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01-06-2015 21:17:22

CONFIDENTIAL

GIUFFRE003290

# EXHIBIT 34

## (Filed Under Seal)

**To:** Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]  
**From:** Jenna  
**Sent:** Thur 2/17/2011 9:44:51 PM  
**Importance:** Normal  
**Subject:** RE:  
**Received:** Thur 2/17/2011 9:44:51 PM

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 documents 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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# EXHIBIT 35

## (Filed Under Seal)

**To:** Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]  
**From:** Jenna  
**Sent:** Sun 2/13/2011 4:29:38 AM  
**Importance:** Normal  
**Subject:** RE: Agreements etc  
**Received:** Sun 2/13/2011 4:29:38 AM

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)

To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]  
From: Jenna  
Sent: Fri 2/25/2011 10:12:25 PM  
Importance: Normal  
Subject: RE: Re:  
Received: Fri 2/25/2011 10:12:25 PM

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

|----->  
|From: |  
|----->  
-----
>-----|  
|----->  
|To: |  
|----->  
>-----|  
|Sharon Churcher |  
>-----|  
|----->  
|Date: |  
|----->  
>-----|  
|25/02/2011 20:54 GMT |  
>-----|  
|----->  
|Subject: |  
|----->  
>-----|  
|RE: |  
>-----|

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)

UNITED STATES DEPARTMENT OF STATE  
APPLICATION FOR ☐ PASSPORT ☐ REGISTRATION  
(Type or print all capital letters in blue or black ink in white areas only)

1. NAME (First and Middle)  
NIRGINIA Lee

LAST  
ROBERTS

2. MAIL PASSPORT TO: STREET / RFD # OR P.O. BOX  
APT. #

CITY  
LOXAHATCHEE

STATE  
FL

ZIP CODE  
33470

COUNTRY / IN CARE OF (if applicable)  
USA

5. DATE OF BIRTH  
JAN 12 2001

6. SOCIAL SECURITY NUMBER  
[REDACTED]

7. HEIGHT  
5' 10"

8. HAIR COLOR  
Blonde

9. EYE COLOR  
Blue Green

10. HOME TELEPHONE  
[REDACTED]

11. BUSINESS TELEPHONE  
[REDACTED]

12. OCCUPATION  
MUSICIAN

13. PERMANENT ADDRESS (DO NOT LIST R.F.D. BOX)  
STREET / RFD # CITY STATE ZIP CODE  
[REDACTED] LOXAHATCHEE FL 33470

14. FATHER'S FULL NAME (Last, First, Middle)  
ROBERTS SKY

15. MOTHER'S FULL MAIDEN NAME (Last, First, Middle)  
LION NIGGINIA

16. HAVE YOU EVER BEEN MARRIED?  
☐ Yes ☒ No

17. OTHER NAMES YOU HAVE USED  
[REDACTED]

18. HAVE YOU EVER BEEN ISSUED A U.S. PASSPORT?  
☐ Yes ☒ No

19. EMERGENCY CONTACT (If you wish, you may supply the name, address and telephone number of a person not traveling with you to be contacted in case of emergency.)  
NAME [REDACTED]  
ADDRESS [REDACTED]  
CITY [REDACTED] STATE [REDACTED] ZIP CODE [REDACTED]

20. TRAVEL PLANS (Indicate date, month, day, year)  
Exp. 01/11/01  
Length of trip 01/21/01  
COUNTRIES TO BE VISITED  
London  
Kathmandu

21. STOP. DO NOT SIGN APPLICATION UNTIL REQUESTED TO DO SO BY PERSON ADMINISTERING OATH.  
(I have not, since acquiring United States citizenship, performed any of the acts listed under "Acts or Conditions" on the reverse of this application form. Unless explanation is attached, I solemnly swear or affirm that the statements made on this application are true and the photograph attached is a true likeness of me.)

22. FOR ACCEPTANCE AGENT'S USE  
Subscribed and sworn to (affirmed) before me  
FOIA: (b)(6)  
Signature of person authorized to accept application  
Date Month Day Year  
23. APPLICANT'S IDENTIFYING DOCUMENTS  
☒ DRIVER'S LICENSE  
☐ PASSPORT  
☐ OTHER (Specify)  
ISSUE DATE 05/21/00 EXPIRATION DATE 05/21/05  
PLACE OF ISSUE FL ISSUED IN THE NAME OF Virginia Roberts

24. FOR ISSUING OFFICE USE ONLY (Applicant's evidence of citizenship)  
☐ Birth Certificate  
☐ Passport  
☐ Report of Birth  
☐ Naturalization/Citizenship Cert.  
☐ Other  
☐ Sent & Returned  
☐ Attached  
FOIA: (b)(6)

25. Fee  
FEE 45 EXEC 25 ET 35 OTHER



# EXHIBIT 38

## (Filed Under Seal)

CASE HISTORY/ASSESSMENT PLANNAME: Vicinia Chiffre DATE: 6.9.11ADDRESS: [REDACTED]Glenn Valley

PHONE NUMBERS:

(H) [REDACTED] (W) [REDACTED] M [REDACTED]AGE: 28 DOB: [REDACTED] PRIVATE HEALTH INS. [REDACTED]FAMILY BACKGROUND/HISTORYSINGLE (Not in a relationship) [REDACTED]SINGLE (In a relationship) - NAME [REDACTED] AGE [REDACTED]How long [REDACTED] Description of partner [REDACTED]DE FACTO RELATIONSHIP - NAME [REDACTED] AGE [REDACTED]How long [REDACTED] Description of partner [REDACTED]

CHILDREN OF RELATIONSHIP:

SONS: [REDACTED]DAUGHTERS: [REDACTED]MARRIED: Name Robert AGE: 40How long 9y Description of spouse [REDACTED]Description of shared relationship: abs. of rel.CHILDREN: [REDACTED]SONS: [REDACTED]DAUGHTERS: [REDACTED]PREVIOUS MARRIAGES/SIGNIFICANT RELATIONSHIPS1. NAME [REDACTED] HOW LONG [REDACTED]Reason relationship finished [REDACTED]CHILDREN: [REDACTED]REFERRAL SOURCE Private (C. Robert)

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

Mother's 1st Marriage  
USA  
2 33 Danny Distant

SISTERS

USA  
23 Shye is close

Single/Married/de facto/Separated/Divorced/Children

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

Shingles Bilateral Ovaries

PRESENT GENERAL HEALTH

Good

MEDICATION

Substance abuse: Alcohol

Excess

Nicotine

Other drug taking

Marijuana Excess

PREGNANCY HISTORY: Number of pregnancies

3

Miscarriages

Ectopic13-19 entrapment

Terminations

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

ANXIETIES/CONCERNS/FEARS

(1) Flashbacks (2) Anxiety & agitated (from birth) and family  
10/10



PHOBIAS \_\_\_\_\_

DESCRIPTION OF PRESENT PROBLEM \_\_\_\_\_

TIME OF ONSET/SYMPTOMS \_\_\_\_\_

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

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

Awareness of mental disorder in family unit/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/bush walking/craft/woodwork \_\_\_\_\_  
Shared with partner \_\_\_\_\_  
Philosophy/belief system Good  
Purpose/meaning of life: To be the best - do no harm  
(C.ess./ Roles/int. ext./Aut. Ind./Cen/Bal./Exp./Exp./Resp. self/Ks.-non-j-c/w. dem. exp./fgv. uncond./  
diminished in ..... reclaiming in .....  
Acknowledged - validation - recognition - —ws. - not - self.) \_\_\_\_\_

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

HYPNOTIC FORMAT: ..... Relaxation response/counting 1-20/Ideomotor/eye catalepsy/  
HOW RECEPTIVE 1 2 3 4 5 6 7 8 9 10 APPROPRIATE FOR FUTURE WORK \_\_\_\_\_

TREATMENT PLAN/FOCUS: \_\_\_\_\_  
Mindfulness-based CBT strategies for PTSD  
Repairing of very damaged cognition from  
past  
Remarkable young woman - supportive therapy  
needed



5

DATE:

PROGRESS:

Many issues from past - to take segments piece by piece - extraordinary past. At 13 a runaway - raped by an older man (escort agency). Police involved.

Parents then sent her to California - raised in Florida by an Aunt - left Alaska sent back to Florida (group facility home). A limo picked her up (Ben Springs) - escort was 'paraded' around by him - he went to jail.

Returned to parents & school. At 15 worked as a locker room assistant / helped in massage area / house maid / receptionist.

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

Seemed respectable. 1st impression good. V then went upstairs & was shown - how to massage etc. (Lycoff Epstein). Told to undress

& perform sexual acts on person. Miss Maxwell promised her \$200 a job (preyed upon) told 'that's what life is all about' - they were rich & powerful & V. was promised a full massage certificate (later) to be sent away for training? place.

Had training manually as how to please a man etc. Still lived with parents until

(6)

DATE:PROGRESS:

put in an apartment in New York  
travelled - used - At 19 U. wanted  
to become qualified & was sent to Thailand  
a cheap training course in Massage!

Met Robert in Thailand who offered to marry  
her & take her back to Australia where  
he lived.

More sessions required re PTSD

# EXHIBIT 39

## (Filed Under Seal)



te: 7/25/06  
ime: 8:47:53

PALM BEACH POLICE DEPARTMENT  
Incident Report

Page: 1  
Program: CMS301L

Case No. . . . . : 1-05-000368  
SPECIAL NOTES : DO NOT RELEASE  
Occur To Date : 1/27/05 0000  
Day Of Week : Thursday  
Common/Location: 358 EL BRILLO WY  
City . . . . . : PALM BEACH, FL  
Location Type : RESIDENCE-SINGLE FAMILY  
Beat Assignment: DETECTIVE BUREAU  
Dept Class . . . : SEXUAL BATTERY  
Case Status . . . : OPEN / ACTIVE  
Supervisory Dt.: TRYLCH, JEFFREY 3/14/05  
Entry Date . . . : OREGERO, LAURA 4/06/05  
Names? . . . . . :  
Vehicles? . . . . :  
Narrative? . . . . :  
Occur From Date: 1/27/05 0000  
Report Date . . : 3/14/05 1600  
Map Reference : 10  
Report Officer : PAGAN, MICHELE  
Case Status Dt : 3/14/05  
Property? . . . :  
Offenses? . . . :  
Related Cases? :

\*\*\*\*\* VEHICLE INFORMATION # 1 \*\*\*\*\*

Case number . . : 1-05-000368  
State Veh Type :  
Make . . . . . :  
Model Name . . :  
Style . . . . . :  
Color - Bottom :  
VIN . . . . . :  
Disposition . . :  
Insured by . . :  
Vehicle locked :  
Date recovered : 0/00/00  
Street number :  
City . . . . . :  
Recovery code :  
Be On Look Out?:  
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 INFO - # 1 \*\*\*\*\*

Case Number . . : 1-05-000368  
Street Number :  
City . . . . . :  
Birth Date/Age :  
Occupation . . :  
Home Phone No. :  
Sex . . . . . : Female  
Weight . . . . . : 0  
Last Name . . . :  
Employer? . . . :  
Oper Lic No. . . :  
Race . . . . . : White  
Height . . . . . : 0  
Other Phone Nbr:

\*\*\*\*\* SUSPECT / ARRESTEE INFORMATION - # 1 \*\*

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  
Prompt valid in: ROBSON, HALEY  
Maximum Age . . : 18  
Occupation . . . :  
Home Phone No. :  
Race . . . . . : White  
Minimum Height : 0  
Maximum Height : 0

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PALM BEACH POLICE DEPARTMENT  
Incident Report

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Case No. . . . . : 1-05-000368

(Continued)

Maximum Weight : 0

Aliases? . . . . :

Hair Color . . . . :

Hair Style . . . . :

Glasses . . . . . :

Facial Hair . . . . :

Teeth . . . . . :

Hat . . . . . :

Shirt . . . . . :

Shoes . . . . . :

Body Marks #2 :

Body Marks #4 :

Arrest Case No.:

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? :

\*\*\*\*\* S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 2 \*\*

Case Number . . : 1-05-000368

Prompt valid in: KELLEN, SARAH LYNNELLE

Street Number . : 358 EL BRILLO WY

City . . . . . : PALM BEACH, FL 000033480

Birth Date . . . : [REDACTED]

Maximum Age . . : 25

Employer? . . . :

Occupation . . . : PERSONAL ASST/EPSTEIN

Oper Lic No. . . : [REDACTED]

Home Phone No. . : 561/000-0000

Other Phone Nbr: 561/000-0000

Sex . . . . . : Female

Race . . . . . : White

Minimum Weight : 0

Minimum Height : 0

Maximum Weight : 0

Maximum Height : 0

Aliases? . . . . :

Misc. ID# . . . . :

Hair Color . . . . :

MO/Crime Spec? :

Hair Style . . . . :

Hair Length . . . . :

Glasses . . . . . :

Eye Color . . . . . :

Facial Hair . . . . :

Complexion . . . . :

Teeth . . . . . :

Build . . . . . :

Hat . . . . . :

Speech . . . . . :

Shirt . . . . . :

Coat . . . . . :

Shoes . . . . . :

Pants . . . . . :

Body Marks #2 :

Body Marks #1 :

Body Marks #4 :

Body Marks #3 :

Arrest Case No.:

Status . . . . . : STILL SUSPECT

Additional UCR? :

\*\*\*\*\* S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 3 \*\*

Case Number . . : 1-05-000368

Prompt valid in: EPSTEIN, JEFFREY

Street Number . : 358 EL BRILLO WY

City . . . . . : PALM BEACH, FL 000033480

Birth Date . . . : [REDACTED]

Maximum Age . . : 52

Employer? . . . :

Occupation . . . :

Oper Lic No. . . : [REDACTED]

Home Phone No. . :

Other Phone Nbr:

Sex . . . . . : Male

Race . . . . . : White

Minimum Weight : 0

Minimum Height : 0

Maximum Weight : 0

Maximum Height : 0

Aliases? . . . . :

Misc. ID# . . . . :

Hair Color . . . . :

MO/Crime Spec? :

Hair Style . . . . :

Hair Length . . . . :

Eye Color . . . . . :



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PALM BEACH POLICE DEPARTMENT  
Incident Report

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Case No. . . . : 1-05-000368

(Continued)

Glasses . . . :	Complexion . . . :
Facial Hair . . :	Build . . . . :
Teeth . . . . :	Speech . . . . :
Hat . . . . . :	Coat . . . . . :
Shirt . . . . . :	Pants . . . . . :
Shoes . . . . . :	Body Marks #1 . :
Body Marks #2 . :	Body Marks #3 . :
Body Marks #4 . :	Status . . . . : STILL SUSPECT
Arrest Case No.:	Additional UCR? :

\*\*\*\*\* 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:	[REDACTED]
Street Number . :	[REDACTED]
City . . . . . :	[REDACTED]
Birth Date/Age . :	[REDACTED] 14
Occupation . . . :	STUDENT
Home Phone No. . :	[REDACTED]
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 . :	

Employer? . . . :	
Oper Lic No. . . :	
Race . . . . . :	White
Height . . . . . :	0
Misc. ID# . . . . :	
Other Phone Nbr:	
Residency Type . :	
File Charges . . :	
Victim Sobriety:	
Injury Type 1 . . :	
Hospital ID . . . :	
Phys First Name:	

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

Case Number . . :	1-05-000368
Street Number . :	[REDACTED]
City . . . . . :	PALM BEACH, FL 000033480
Birth Date/Age . :	[REDACTED] 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 . :	

Employer? . . . :	
Oper Lic No. . . :	
Race . . . . . :	White
Height . . . . . :	0
Misc. ID# . . . . :	
Other Phone Nbr:	561/000-0000
Residency Type . :	
File Charges . . :	
Victim Sobriety:	
Injury Type 1 . . :	
Hospital ID . . . :	
Phys First Name:	

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

Case Number . . :	1-05-000368
Street Number . :	[REDACTED]
City . . . . . :	PALM BEACH, FL 000033480
Birth Date/Age . :	[REDACTED] 16
Employer? . . . :	

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Incident Report

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Case No. . . . : 1-05-000368  
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 :

(Continued)  
Oper Lic No. . :  
Race . . . . . : White  
Height . . . . : 0  
Misc. ID# . . . :  
Other Phone Nbr: 561/000-0000  
Residency Type :  
File Charges . :  
Victim Sobriety:  
Injury Type 1 :  
Hospital ID . . :  
Phys First Name:

\*\*\*\*\* V I C T I M I N F O R M A T I O N - # 4 \*\*\*\*\*

Case Number . : 1-05-000368

Prompt valid in: [REDACTED]

Street Number :

City . . . . . : PALM BEACH, FL 000033480

Birth Date/Age : [REDACTED] 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 :

Employer? . . . :

Oper Lic No. . . :

Race . . . . . : White

Height . . . . : 0

Misc. ID# . . . :

Other Phone Nbr: 561/000-0000

Residency Type :

File Charges . . :

Victim Sobriety:

Injury Type 1 :

Hospital ID . . :

Phys First Name:

\*\*\*\*\* V I C T I M I N F O R M A T I O N - # 5 \*\*\*\*\*

Case Number . : 1-05-000368

Prompt valid in: [REDACTED]

Street Number :

City . . . . . : PALM BEACH, FL 000033480

Birth Date/Age : [REDACTED] 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 :

Employer? . . . :

Oper Lic No. . . :

Race . . . . . : White

Height . . . . : 0

Misc. ID# . . . :

Other Phone Nbr: 561/000-0000

Residency Type :

File Charges . . :

Victim Sobriety:

Injury Type 1 :

Hospital ID . . :

Phys First Name:

\*\*\*\*\* V I C T I M I N F O R M A T I O N - # 6 \*\*\*\*\*

Case Number . : 1-05-000368

Prompt valid in: [REDACTED]

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Case No. . . . . : 1-05-000368 (Continued)  
 Street Number :  
 City . . . . . : PALM BEACH, FL 000033480  
 Birth Date/Age : [REDACTED] 16  
 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 :  
 Employer? . . . :  
 Oper Lic No. . . :  
 Race . . . . . : White  
 Height . . . . . : 0  
 Misc. ID# . . . :  
 Other Phone Nbr: 561/000-0000  
 Residency Type :  
 File Charges . . :  
 Victim Sobriety:  
 Injury Type 1 :  
 Hospital ID . . :  
 Phys First Name:

\*\*\*\*\* V I C T I M I N F O R M A T I O N - # 7 \*\*\*\*\*  
 Case Number . . : 1-05-000368 Prompt valid in: [REDACTED]  
 Street Number :  
 City . . . . . : PALM BEACH, FL 000033480  
 Birth Date/Age : [REDACTED] 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 :  
 Employer? . . . :  
 Oper Lic No. . . :  
 Race . . . . . : White  
 Height . . . . . : 0  
 Misc. ID# . . . :  
 Other Phone Nbr: 561/000-0000  
 Residency Type :  
 File Charges . . :  
 Victim Sobriety:  
 Injury Type 1 :  
 Hospital ID . . :  
 Phys First Name:

\*\*\*\*\* V I C T I M I N F O R M A T I O N - # 8 \*\*\*\*\*  
 Case Number . . : 1-05-000368 Prompt valid in: [REDACTED]  
 Street Number :  
 City . . . . . : PALM BEACH, FL 000033480  
 Birth Date/Age : [REDACTED] 16  
 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 :  
 Employer? . . . :  
 Oper Lic No. . . :  
 Race . . . . . : White  
 Height . . . . . : 0  
 Misc. ID# . . . :  
 Other Phone Nbr: 561/000-0000  
 Residency Type :  
 File Charges . . :  
 Victim Sobriety:  
 Injury Type 1 :  
 Hospital ID . . :  
 Phys First Name:

\*\*\*\*\* V I C T I M I N F O R M A T I O N - # 9 \*\*\*\*\*

Date: 7/25/06  
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Case No. . . . : 1-05-000368  
Case Number . . : 1-05-000368  
Street Number . :  
City . . . . . : PALM BEACH, FL 000033480  
Birth Date/Age : [REDACTED] 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 :  
Employer? . . . :  
Oper Lic No. . . :  
Race . . . . . : White  
Height . . . . . : 0  
Misc. ID# . . . :  
Other Phone Nbr: 561/000-0000  
Residency Type :  
File Charges . . :  
Victim Sobriety:  
Injury Type 1 . :  
Hospital ID . . :  
Phys First Name:

(Continued)

\*\*\*\*\* 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] 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 :  
Employer? . . . :  
Oper Lic No. . . :  
Race . . . . . : White  
Height . . . . . : 0  
Misc. ID# . . . :  
Other Phone Nbr: 561/000-0000  
Residency Type :  
File Charges . . :  
Victim Sobriety:  
Injury Type 1 . :  
Hospital ID . . :  
Phys First Name:

\*\*\*\*\* V I C T I M I N F O R M A T I O N - # 11 \*\*\*\*\*

Case Number . . : 1-05-000368  
Street Number . :  
City . . . . . : PALM BEACH, FL 000033480  
Birth Date/Age : [REDACTED] 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 . :  
Employer? . . . :  
Oper Lic No. . . :  
Race . . . . . : White  
Height . . . . . : 0  
Misc. ID# . . . :  
Other Phone Nbr: 561/000-0000  
Residency Type :  
File Charges . . :  
Victim Sobriety:  
Injury Type 1 . :  
Hospital ID . . :  
Phys First Name:

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Case No. . . . : 1-05-000368

(Continued)

Phys Last Name :

## \*\*\*\*\* V I C T I M I N F O R M A T I O N - # 12 \*\*\*\*\*

Case Number . : 1-05-000368

Prompt valid in: [REDACTED]

Street Number :

City . . . . : PALM BEACH, FL 000033480

Birth Date/Age : [REDACTED] 18

Employer? . . . :

Occupation . . :

Oper Lic No. . . :

Home Phone No. : 561/000-0000

Race . . . . : White

Sex . . . . : Female

Height . . . . : 0

Weight . . . . : 0

Misc. ID# . . . :

Be On Look Out? :

Other Phone Nbr: 561/000-0000

Victim Type . : ADULT

Residency Type :

Residency Sts :

File Charges . . :

Can Identify . . :

Victim Sobriety:

Injury Extent :

Injury Type 1 :

Injury Type 2 :

Hospital ID . . :

Med Treatment :

Phys First Name:

Phys Last Name :

## \*\*\*\*\* V I C T I M I N F O R M A T I O N - # 13 \*\*\*\*\*

Case Number . : 1-05-000368

Prompt valid in: [REDACTED]

Street Number :

City . . . . : PALM BEACH, FL 000033480

Birth Date/Age : [REDACTED] 16

Employer? . . . :

Occupation . . :

Oper Lic No. . . :

Home Phone No. : 561/000-0000

Race . . . . : White

Sex . . . . : Female

Height . . . . : 0

Weight . . . . : 0

Misc. ID# . . . :

Be On Look Out? :

Other Phone Nbr: 561/000-0000

Victim Type . : JUVENILE

Residency Type :

Residency Sts :

File Charges . . :

Can Identify . . :

Victim Sobriety:

Injury Extent :

Injury Type 1 :

Injury Type 2 :

Hospital ID . . :

Med Treatment :

Phys First Name:

Phys Last Name :

## \*\*\*\*\* V I C T I M I N F O R M A T I O N - # 14 \*\*\*\*\*

Case Number . : 1-05-000368

Prompt valid in: [REDACTED]

Street Number :

City . . . . : PALM BEACH, FL 000033480

Birth Date/Age : [REDACTED] 16

Employer? . . . :

Occupation . . :

Oper Lic No. . . :

Home Phone No. : 561/000-0000

Race . . . . : White

Sex . . . . : Female

Height . . . . : 0

Weight . . . . : 0

Misc. ID# . . . :

Be On Look Out? :

Other Phone Nbr: 561/000-0000

Victim Type . : JUVENILE

Residency Type :

Residency Sts :

File Charges . . :

Can Identify . . :

Victim Sobriety:

Injury Extent :

Injury Type 1 :



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Case No. . . . : 1-05-000368 (Continued)  
 Injury Type 2 : Hospital ID . . :  
 Med Treatment : Phys First Name:  
 Phys Last Name :

\*\*\*\*\* V I C T I M I N F O R M A T I O N - # 15 \*\*\*\*\*

Case Number . : 1-05-000368 Prompt valid in: [REDACTED]  
 Street Number :  
 City . . . . : PALM BEACH, FL 000033480  
 Birth Date/Age : [REDACTED] 19 Employer? . . . :  
 Occupation . . : Oper Lic No. . . :  
 Home Phone No. : 561/000-0000 Race . . . . : White  
 Sex . . . . : Female Height . . . . : 0  
 Weight . . . . : 0 Misc. ID# . . . :  
 Be On Look Out?: Other Phone Nbr: 561/000-0000  
 Victim Type . : ADULT Residency Type :  
 Residency Sts : File Charges . :  
 Can Identify . : Victim Sobriety:  
 Injury Extent : Injury Type 1 :  
 Injury Type 2 : Hospital ID . :  
 Med Treatment : Phys First Name:  
 Phys Last Name :

\*\*\*\*\* V I C T I M I N F O R M A T I O N - # 16 \*\*\*\*\*

Case Number . : 1-05-000368 Prompt valid in: [REDACTED]  
 Street Number :  
 City . . . . : PALM BEACH, FL 000033480  
 Birth Date/Age : [REDACTED] 17 Employer? . . . :  
 Occupation . . : Oper Lic No. . . :  
 Home Phone No. : 561/000-0000 Race . . . . : White  
 Sex . . . . : Female Height . . . . : 0  
 Weight . . . . : 0 Misc. ID# . . . :  
 Be On Look Out?: Other Phone Nbr: 561/000-0000  
 Victim Type . : JUVENILE Residency Type :  
 Residency Sts : File Charges . :  
 Can Identify . : Victim Sobriety:  
 Injury Extent : Injury Type 1 :  
 Injury Type 2 : Hospital ID . :  
 Med Treatment : Phys First Name:  
 Phys Last Name :

\*\*\*\*\* V I C T I M I N F O R M A T I O N - # 17 \*\*\*\*\*

Case Number . : 1-05-000368 Prompt valid in: [REDACTED]  
 Street Number :  
 City . . . . : PALM BEACH, FL 000033480  
 Birth Date/Age : [REDACTED] 16 Employer? . . . :  
 Occupation . . : Oper Lic No. . . :  
 Home Phone No. : 561/000-0000 Race . . . . : White  
 Sex . . . . : Female Height . . . . : 0  
 Weight . . . . : 0 Misc. ID# . . . :  
 Be On Look Out?: Other Phone Nbr: 561/000-0000  
 Victim Type . : JUVENILE Residency Type :  
 Residency Sts : File Charges . :

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

PALM BEACH POLICE DEPARTMENT  
Incident Report

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Case No. . . . : 1-05-000368  
Can Identify . . :  
Injury Extent . . :  
Injury Type 2 . . :  
Med Treatment . . :  
Phys Last Name . . :

Victim Sobriety:  
Injury Type 1 . . :  
Hospital ID . . :  
Phys First Name:

(Continued)

\*\*\*\*\* OTHER PERSON

INFORMATION - # 1 \*\*\*\*\*

Case Number . . : 1-05-000368

Last Name . . : [REDACTED]

Street Number . . : [REDACTED]

City . . . . . : WEST PALM BEACH, FL 33411

Birth Date/Age . . : [REDACTED] 14

Employer? . . . :

Occupation . . . : STUDENT

Oper Lic No. . . :

Home Phone No. . . : [REDACTED]

Race . . . . . : White

Sex . . . . . : Female

Height . . . . . : 0

Weight . . . . . : 0

Person Type . . : OTHER PERSON

Other Phone Nbr:

\*\*\*\*\* OTHER PERSON

INFORMATION - # 2 \*\*\*\*\*

Case Number . . : 1-05-000368

Last Name . . : MARCINKOVA, NADA

Street Number . . : 358 EL BRILLO WY

City . . . . . : PALM BEACH, FL 000033480

Birth Date/Age . . : [REDACTED] 19

Employer? . . . :

Occupation . . . :

Oper Lic No. . . : [REDACTED]

Home Phone No. . . : [REDACTED]

Race . . . . . : White

Sex . . . . . : Female

Height . . . . . : 510

Weight . . . . . : 0

Person Type . . : OTHER PERSON

Other Phone Nbr:

\*\*\*\*\* OTHER PERSON

INFORMATION - # 3 \*\*\*\*\*

Case Number . . : 1-05-000368

Last Name . . : [REDACTED]

Street Number . . : [REDACTED]

City . . . . . : ROYAL PALM BEACH, FL 33411

Birth Date/Age . . : [REDACTED] 35

Employer? . . . :

Occupation . . . :

Oper Lic No. . . :

Home Phone No. . . : [REDACTED]

Race . . . . . : White

Sex . . . . . : Female

Height . . . . . : 0

Weight . . . . . : 0

Person Type . . : OTHER PERSON

Other Phone Nbr: [REDACTED]

\*\*\*\*\* OTHER PERSON

INFORMATION - # 4 \*\*\*\*\*

Case Number . . : 1-05-000368

Last Name . . : [REDACTED]

Street Number . . : [REDACTED]

City . . . . . : [REDACTED]

Birth Date/Age . . : [REDACTED] 37

Employer? . . . :

Occupation . . . : PAINTER

Oper Lic No. . . :

Home Phone No. . . : [REDACTED]

Race . . . . . : White

Sex . . . . . : Male

Height . . . . . : 0

Weight . . . . . : 0

Person Type . . : OTHER PERSON

Other Phone Nbr:

\*\*\*\*\* OTHER PERSON

INFORMATION - # 5 \*\*\*\*\*

Case Number . . : 1-05-000368

Last Name . . : [REDACTED]

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 Street Number :  
 City . . . . . :  
 Birth Date/Age : 0/00/0000 0 Employer? . . . :  
 Occupation . . : FAMILY THERAPIST Oper Lic No. . . :  
 Home Phone No. : 561/000-0000 Race . . . . . : White  
 Sex . . . . . : Female Height . . . . . : 0  
 Weight . . . . . : 0 Person Type . . : OTHER PERSON  
 Other Phone Nbr: 561/000-0000

## \*\*\*EMPLOYER INFORMATION\*\*\*

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

\*\*\*\*\* O T H E R P E R S O N I N F O R M A T I O N - # 6 \*\*\*\*\*  
 Case Number . . : 1-05-000368 Last Name . . . :  
 Street Number :  
 City . . . . . : WELLINGTON, FL 33414  
 Birth Date/Age : 16 Employer? . . . :  
 Occupation . . : STUDENT Oper Lic No. . . :  
 Home Phone No. : Race . . . . . : White  
 Sex . . . . . : Male Height . . . . . : 0  
 Weight . . . . . : 0 Person Type . . : OTHER PERSON  
 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 . :

\*\*\*\*\* O T H E R P E R S O N I N F O R M A T I O N - # 7 \*\*\*\*\*  
 Case Number . . : 1-05-000368 Last Name . . . :  
 Street Number :  
 City . . . . . :  
 Birth Date/Age : 0/00/0000 0 Employer? . . . :  
 Occupation . . : Oper Lic No. . . :  
 Home Phone No. : Race . . . . . : White  
 Sex . . . . . : Male Height . . . . . : 0  
 Weight . . . . . : 0 Person Type . . : OTHER PERSON  
 Other Phone Nbr:

\*\*\*\*\* O T H E R P E R S O N I N F O R M A T I O N - # 8 \*\*\*\*\*  
 Case Number . . : 1-05-000368 Last Name . . . :  
 Street Number :  
 City . . . . . :  
 Birth Date/Age : 0/00/0000 0 Employer? . . . :  
 Occupation . . : Oper Lic No. . . :  
 Home Phone No. : Race . . . . . :  
 Sex . . . . . : Female Height . . . . . : 0

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Weight . . . . : 0  
Other Phone Nbr:

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Person Type . : OTHER PERSON

\*\*\*\*\* O T H E R       P E R S O N

I N F O R M A T I O N - # 9 \*\*\*\*\*

Case Number . : 1-05-000368  
Street Number : [REDACTED]  
City . . . . : [REDACTED]  
Birth Date/Age : [REDACTED] 16  
Occupation . . : [REDACTED]  
Home Phone No. : 561/000-0000  
Sex . . . . . : Female  
Weight . . . . : 0  
Other Phone Nbr: 561/000-0000

Last Name . . : [REDACTED]  
Employer? . . . : [REDACTED]  
Oper Lic No. . : [REDACTED]  
Race . . . . . : White  
Height . . . . : 0  
Person Type . : OTHER PERSON

\*\*\*\*\* N A R R A T I V E    # 1 \*\*\*\*\*

Original Report       LO       Reported By: PAGAN, MICHELE D.       9/20/05  
Entered By.: OREGERO, LAURA D.       9/20/05

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.

[REDACTED] identified his daughter as [REDACTED] w/f, DOB [REDACTED] resides with her biological mother [REDACTED] at [REDACTED]. [REDACTED] is a twin,



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her sister [REDACTED] resides with Mr. [REDACTED]. Both [REDACTED] and [REDACTED] are currently attending [REDACTED] school, which is an involuntary admitted juvenile educational facility. [REDACTED] stays at the facility during the week and comes home on the weekend. According to [REDACTED], 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. [REDACTED], she believes the incident occurred on Sunday, Feb 6, 2005. A friend of [REDACTED]'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. [REDACTED] further explained that [REDACTED] was introduced to Haley by [REDACTED], a boy she was dating (goes to [REDACTED], plays baseball). Mrs. [REDACTED] continued that on Sunday, Haley picked up [REDACTED], 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 [REDACTED] did not have any information on Haley other than she lives on [REDACTED] the last house on right side (north side).

Mrs. [REDACTED] talked of a conversation that she had with [REDACTED], the mother of [REDACTED] a former friend of [REDACTED]'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 [REDACTED] and a boy named [REDACTED].

Mrs. [REDACTED] told me of an incident that occurred on 02/09/2005. [REDACTED] got into a fight at school [REDACTED]. Mrs. [REDACTED] Assistant Principal, found over \$300.00 in [REDACTED]'s purse. [REDACTED] 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, [REDACTED] 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 [REDACTED] received the call from [REDACTED]'s mother, [REDACTED] that she learned [REDACTED] was the girl that got into the fight with [REDACTED]. The fight was instigated when [REDACTED] accused [REDACTED] of being a prostitute.

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

Mr. [REDACTED] stated that he had no objections with our agency speaking with his daughter [REDACTED] about the incident. Mr. [REDACTED] stated that [REDACTED]'s mother [REDACTED] is aware of the allegations and also was willing to cooperate. According to Mrs. [REDACTED] she does not believe her daughter had any additional contact with the suspect as she was with



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her mother and then placed into [REDACTED]

I contacted the School Board Police who provided me the information for [REDACTED]

[REDACTED] West Palm Beach, Florida. Checking the school board records for [REDACTED] and [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 PBSP 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] ( [REDACTED] 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 [REDACTED] 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 [REDACTED] 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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██████████ stated 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. ██████████ believed the woman was Epstein's Assistant. ██████████ added that the woman did not seem friendly and kept her responses short and direct. Epstein introduced himself to ██████████ as Jeff. ██████████ 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, ██████████ became upset and started to cry. ██████████ stated 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 ██████████ that Epstein would be up in a second. The woman left the room, and soon after, Epstein walked in and told ██████████ to take off her clothes. As ██████████ was telling me what had happened, she looked away from me, and with a pointed finger, repeatedly pressed it into her thigh. ██████████ stated he was stern when he told her to take off her clothes. ██████████ said she did not know what to do as she was the only one there. ██████████ took off her shirt leaving her bra on. Epstein, dressed in a towel told her to take off everything. ██████████ 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. As ██████████ began to give Epstein the massage, he told her to get on his back. ██████████ stated she straddled herself on Epstein's back. ██████████ stated her exposed buttocks were touching Epstein's bare buttocks. As ██████████ was giving Epstein the massage, he turned around, and wacked off ██████████ (later explained that wacking off was masturbating). ██████████ stated she was disgusted 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 ██████████ that he was done and gave her three hundred dollars. They went back down stairs where they met Robson. Epstein said good-bye and they left. Robson asked ██████████ how did it go and asked what did she ██████████ do. When ██████████ told Robson that Epstein asked for a massage, Robson allegedly stated "I know." ██████████ stated they then went shopping. ██████████ 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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██████████ stated she was afraid that Robson would retaliate against her or her family if she ever went to the police regarding the incident. ██████████ stated that her father's vehicle was recently vandalized. ██████████ admitted to telling ██████████ what had happened with Epstein. According to ██████████ became angry and upset, punching a hole in the wall. ██████████ guessed that it was ██████████ who told ██████████ about the incident, and now there were rumors in school about ██████████ and what she did with Epstein.

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

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

I made contact with ██████████ mother of ██████████. 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 ██████████. ██████████ stated that it was her opinion that both girls liked ██████████. ██████████ recalled hearing her daughter calling ██████████ a whore. ██████████ admitted that she did not listen to the entire conversation but did confront her daughter about it later. ██████████ told her mother that something to the effect that ██████████ had slept with an older man for money. ██████████ stated that she would not object to me speaking with her daughter. It was ██████████'s belief that everyone in the school may have known about this because of the fight that her daughter ██████████ and ██████████ had gotten into. I reminded ██████████ 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 Jeffery Epstein on the internet and obtained

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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 PB 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, uk/f, dob [REDACTED]. A computer query for both returned no history.

On 03/23/2005, I spoke with [REDACTED] 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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investigation. I received return phone calls from Mrs. [REDACTED] and Mrs. [REDACTED] and advised them that I would be contacting [REDACTED]'s family therapist to coordinate a time to meet with [REDACTED]. This was at the request of both [REDACTED] and Mrs. [REDACTED] that [REDACTED]'s strict classroom and therapy schedule be disrupted as little as possible. I also updated them to the investigation thus far. Both [REDACTED] and [REDACTED] stated they had no objection to my meeting with [REDACTED]. In speaking with Ms. [REDACTED], she identified the cell phone number of [REDACTED] as being the phone assigned to [REDACTED] 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. [REDACTED] stated the phone had been taken away from [REDACTED] as part of her punishment for not doing well in school. According to [REDACTED], [REDACTED] used to be an excellent student, but in the past two months has become irritable, verbally abusive to the family and has run away. [REDACTED] stated her daughter's recent behavior is the opposite of what she normally is. [REDACTED] 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 [REDACTED] at her place of employment.

I called [REDACTED], [REDACTED] 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 8:00PM I had called Ms. [REDACTED] at which 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 [REDACTED]'s school schedule. [REDACTED] had no objections. Shortly after speaking with Ms. [REDACTED] I received a call from Ms. [REDACTED]. I explained the situation and requested a time to meet with [REDACTED]. [REDACTED] reviewed [REDACTED]'s schedule and advised that [REDACTED] would be available after 3:00PM.

On 03/30/2005, I met with Ms. [REDACTED] and [REDACTED] at [REDACTED]. I reminded [REDACTED] of her conversation with Robson. During this time [REDACTED] 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 [REDACTED] while she and Epstein were alone on the second floor, Epstein used a purple vibrator to massage her vaginal area. [REDACTED] stated there was no penetration as the vibrator was on top of her underwear. I asked [REDACTED] if Epstein ever asked her age and she stated he had. [REDACTED] stated she told him she was eighteen. When Epstein asked what school she was in, [REDACTED] responded she was in the twelfth grade at Wellington. During the course of this incident, [REDACTED] stated Epstein told her that Haley had worked for him for years.

We then continued with the controlled call to Robson. At approximately 3:35pm [REDACTED] from her cell phone, made a call to Robson's home, [REDACTED]. Robson was not home. [REDACTED] was told

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that Haley Robson was at work a double and could be reached on her cell phone, [REDACTED] W/F, Haley Robson is employed at The Olive Garden Restaurant, located on Forest Hills Blvd in Wellington.

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

During the course of these conversations with [REDACTED] 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. [REDACTED] 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. [REDACTED] 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 [REDACTED].

On 03/31/2005, subpoena requests for T-Mobile Wireless [REDACTED] and Cingular Wireless, [REDACTED] (Robson and [REDACTED] 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. Krauel of the Palm Beach Police Department who provided 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 [REDACTED] 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

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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 [REDACTED] 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 papers. There was a message from Haley, indicating [REDACTED] 11:00. The following was additional information obtained from trash retrieved from 358 El Brillo: Jean Luc 6:20 AM; David [REDACTED] Sarah Kellen [REDACTED]

[REDACTED] Friday 5:30PM; [REDACTED]  
[REDACTED] Haley; a message receipt dated 4/4 1:05- [REDACTED]. [REDACTED]  
She is looking to speak to you .; [REDACTED].

On 04/06/2005, I faxed subpoena requests to SA Mighdoll's office for Epstein, Robson and [REDACTED]'s phone records. (Phone numbers [REDACTED] & [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 [REDACTED] 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]  
[REDACTED] Wellington, Florida. [REDACTED] Parents name: [REDACTED].

Det. Lee provided me with trash obtained from 358 El Brillo for 04/06 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 N908JE; a note stating Bye J. thank you [REDACTED] hand written notes & messages 11-Glenn, 12:30 chicken, [REDACTED] 4. 3 September B & J, Big Screen x8, [REDACTED] work Sunday @ 4PM. [REDACTED] Monday after school?; left message for [REDACTED]; [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 [REDACTED].

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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 [REDACTED] 1984 FL DL [REDACTED] and [REDACTED] DOB [REDACTED] 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]'s phone records. (Phone numbers [REDACTED] and [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.

\*\*\*\*\* N A R R A T I V E # 2 \*\*\*\*\*

NA

Reported By: RECAREY, JOSEPH  
Entered By.: ALTOMARO, NICKIE A.

9/21/05  
9/21/05

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

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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.

\*\*\*\*\* N A R R A T I V E # 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.

\*\*\*\*\* N A R R A T I V E # 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

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property number 05-294 with the blank tape.

\*\*\*\*\* N A R R A T I V E # 5 \*\*\*\*\*

NA

Reported By: RECAREY, JOSEPH  
Entered By.: ALTOMARO, NICKIE A.

9/26/05

9/28/05

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] and [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 Telecommunication 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....

\*\*\*\*\* N A R R A T I V E # 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.



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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 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

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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 bed 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.

\*\*\*\*\* N A R R A T I V E # 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 [REDACTED] as to her involvement with Epstein and the girls that are brought to his house. As we were to interview [REDACTED] 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 [REDACTED] as the interview may occur in the county. Supervisor Ortiz assigned Investigator Mike Waites to assist us at the location and interview of [REDACTED].

Det. Dicks had responded to the address of [REDACTED] and viewed her vehicle parked in the driveway. [REDACTED]'s vehicle a red Plymouth Neon bearing [REDACTED] was parked in the driveway of [REDACTED] 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 [REDACTED] 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 [REDACTED]. [REDACTED] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo in Palm Beach. [REDACTED] 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]'s 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 [REDACTED] 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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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 Date of Birth [REDACTED], had 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. [REDACTED] further stated that Sara still tries to call the house and leaves messages. With the assistance of [REDACTED] we were able to identify [REDACTED] DOB [REDACTED] 1987, [REDACTED] DOB [REDACTED] 1987, [REDACTED] DOB [REDACTED] 1988, and [REDACTED] DOB [REDACTED] 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 [REDACTED]. We met with Mrs. [REDACTED] ([REDACTED]'s Mother) at the front door. We explained the ongoing investigation and felt that [REDACTED] may have additional information as we had information that she had worked for Jeff. 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, Mrs. [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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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 [REDACTED] 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. [REDACTED] 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 [REDACTED] had my telephone number and hopefully she would call.

Sgt Frick and I then attempted contact with [REDACTED] at [REDACTED] in Loxahatchee. We met with [REDACTED] who stated [REDACTED] was her daughter. [REDACTED] was at the Wellington Mall and was not home. We explained the ongoing investigation and felt the [REDACTED] 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 [REDACTED]. She stated she had spoken with her daughter and she had information as to what occurred at Jeff's house. I contacted [REDACTED] 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 Loxahatchee. Det. Dawson and I drove to the [REDACTED] home and met with [REDACTED] and [REDACTED]. During a sworn taped statement, [REDACTED] 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. [REDACTED] 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. [REDACTED] 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. [REDACTED] said she was wierded out by the incident involving Jeff. At the conclusion of the massage, she was paid \$200.00 for the massage. I asked [REDACTED] 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. [REDACTED] stated Robson also received money for taking her there. [REDACTED] stated she went with Robson and another girl, [REDACTED] to Jeff's house once. [REDACTED] stated she waited in the kitchen with Robson, while [REDACTED] was taken upstairs by Sara. [REDACTED] stated she only did the massage once, as she was wierded 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 [REDACTED] 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. [REDACTED] provided the incoming telephone number as [REDACTED]. [REDACTED] stated she inadvertently told [REDACTED] about the police investigation because [REDACTED] had called her to tell her about how she just received a rental car from Jeff Epstein. [REDACTED] had called her to tell her that she was given a rental car, a 2005 silver Nissan Sentra, to utilize to visit family and visit Jeff. [REDACTED] asked her what was going on at the house that the police would be asking questions. [REDACTED] stated [REDACTED] then called Jeff and Sara and asked what was going on reference the ongoing police investigation. According to [REDACTED], Sara has since then been trying to contact her to ask about the police questions. I instructed [REDACTED] not to contact Sara and do not provide any more information to [REDACTED] as she would notify Jeff Epstein and Sara what was transpiring.

Investigation Continues...

\*\*\*\*\* N A R R A T I V E # 8 \*\*\*\*\*

NA

Reported By: LEE, LA'MONT  
Entered By.: ALTOMARO, NICKIE A.

10/07/05  
10/07/05

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, where he turned over seventeen white plastic trash bags, which were collected from Epstein's property.

I took the trash bags to the sanitation department where I sifted through its contents. I collected mail correspondence from Armani Exchange addressed to Nada Marcinkova, Jeffrey E. Epstein notepaper with [REDACTED], an important message notepaper addressed to J.E dated 03/29/05 at 8:15 p.m. reference [REDACTED] U.S Airways boarding pass copy for passenger, Janusz Banasiak, Montgomery County, Maryland Health Department food service ID [REDACTED] 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 El 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 El 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 El Brillo Way to meet with Town of Palm Beach sanitation employee, Jessie Jones. While parked in the area of 358 El Brillo Way waiting to collect Epstein's trash, I observed a white female, who 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 El 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 mail correspondences addressed to Jeffrey Epstein, automotive records and personal documents for Janusz Banasiak and Beata Banasiak as well as Jeffrey Epstein notepaper with the names and appointment times for [REDACTED] and [REDACTED]. No last names or other personal information was written on the notepaper.

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 El 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.

[REDACTED]  
[REDACTED]  
blank piece of white paper [REDACTED]  
black paper [REDACTED]  
black paper [REDACTED]  
David [REDACTED]  
MSN Hotmail web page with email address [REDACTED] com)

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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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.

\*\*\*\*\* N A R R A T I V E # 9 \*\*\*\*\*

NA Reported By: RECAREY, JOSEPH 10/07/05  
Entered By.: ALTOMARO, NICKIE A. 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 15:48 pm, I made telephone contact with [REDACTED] at [REDACTED]. During a taped recorded 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 that her friend, [REDACTED] was also at the house and had a problem with Jeff. She provided a telephone number

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for [REDACTED] 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 [REDACTED] a message. The telephone number, [REDACTED] was assigned to ATT/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 [REDACTED] and discovered she resides in Royal Palm Beach. Det. Dawson and I drove to Royal Palm Beach and met with [REDACTED] at her residence [REDACTED] in Royal Palm Beach.

[REDACTED] agreed to speak with us in the kitchen area. During a sworn taped statement, [REDACTED] 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 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 [REDACTED] and [REDACTED] went with them. They were brought into the kitchen where she was introduced to Jeff and other females. [REDACTED] 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 out lotions to be used. She told [REDACTED] Jeff would be 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.

[REDACTED] further stated that during the massage Jeff asked her to remove her clothes. She complied and removed her pants and blouse. [REDACTED] didn't remember if she had removed her bra but feels that she did.

[REDACTED] was certain that she stayed in her thong underwear. [REDACTED] continued the massage and at one point she straddled him to massage his back, which touched his buttocks with hers. [REDACTED] was instructed to return to the ground at which time Jeff turned to have his chest rubbed. [REDACTED] advised it was at this time she is sure he was masturbating. [REDACTED] did not want to look at his penis area because she was uncomfortable. Jeff removed a large white vibrator and turned it on. [REDACTED] 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 [REDACTED] how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, [REDACTED] was paid either \$350.00 or \$400.00. She stated she wasn't sure, but knows it was close to \$400.00. At the conclusion of the interview, [REDACTED] stated she never returned to provide a massage for Jeff. She advised she was ashamed and uncomfortable with the situation.



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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]. I 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 2:10 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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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]. [REDACTED] 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 [REDACTED] 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]'s 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]. [REDACTED] was unable to remember [REDACTED]'s telephone number. The interview was concluded and we left the area.

Investigation Continues...

\*\*\*\*\* N A R R A T I V E # 10 \*\*\*\*\*  
NA Reported By: RECAREY, JOSEPH 10/09/05  
Entered By.: ALTOMARO, NICKIE A. 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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pushing to go further and further. [REDACTED] 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 [REDACTED] admitted to removing her clothes and staying in her thong underwear to provide a massage. [REDACTED] 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. [REDACTED] 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. [REDACTED] 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. [REDACTED] advised Jeff would ask her questions about herself. He knew she was a soccer player and would be attending Lynn University. I asked [REDACTED] if he knew her real age, [REDACTED] 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 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 [REDACTED] 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. [REDACTED] was asked if he ever used a vibrator on her. [REDACTED] was aware of the vibrator but advised she never 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. [REDACTED] 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.

[REDACTED] 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 [REDACTED] she would have the car for a month. [REDACTED] stated Jeff knew her car was not working properly and had missed appointments in the past because of her car being inoperable. [REDACTED] explained the car is currently parked next to the Gym field. I asked her if she ever took any one to the house. [REDACTED] explained she took [REDACTED] a friend of hers who has returned to Orlando to attend college. I asked she ever allowed another female in the room. [REDACTED] 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 [REDACTED] the victim's mother, at [REDACTED] I explained to her that I was following up on this case and provided a complete update on the case.

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\*\*\*\*\* N A R R A T I V E # 11 \*\*\*\*\*  
NA Reported By: RECAREY, JOSEPH 10/21/05  
Entered By.: ALTOMARO, NICKIE A. 10/21/05

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 [REDACTED] 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. She claimed to have made thousands of dollars during her visits. [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 [REDACTED] in person. Sgt. Frick agreed and made arraignments for Det. Dawson and I to meet with [REDACTED] in Jacksonville, Florida.

On October 11, 2005, at 4:10 p.m., Det. Dawson and I met with [REDACTED] and her friend, [REDACTED] at [REDACTED] in Jacksonville, Florida. [REDACTED] wanted to have [REDACTED] present for support. I explained to her that I did not have a problem as long as she wanted [REDACTED] present during the interview. [REDACTED] stated she wanted her present. I explained that as [REDACTED] was present she was not allowed to comment or ask any questions during the interview. She was only there to comfort [REDACTED] 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 shirt 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 shirt. [REDACTED] removed her shirt 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 \$200.00. They walked together downstairs where Sara and [REDACTED] were waiting. [REDACTED] stated [REDACTED] 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 there 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. . . . agreed to perform the oral sex for the additional \$200.00. . . . 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 . . . 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 who was on top during the intercourse. . . . explanation revealed they were in a missionary position.

. . . advised one day, . . . was unable to state an 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 Dodge 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 ██████████ net, 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...

\*\*\*\*\* N A R R A T I V E # 12 \*\*\*\*\*  
NA Reported By: RE CAREY, JOSEPH 11/01/05  
Entered By.: ALTOMARO, NICKIE A. 11/07/05

On October 12, 2005, Det. Dawson and I traveled to the Orlando area and made telephone contact with ██████████. ██████████ agreed to meet with us as we were in the Orlando area. ██████████ provided directions to her apartment. Det. Dawson 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.



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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 [REDACTED] FL DL [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 Atty. 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..

\*\*\*\*\* N A R R A T I V E # 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 us 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 El 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.

\*\*\*\*\* N A R R A T I V E # 14 \*\*\*\*\*  
NA Reported By: DAWSON, 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



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female from the waist up. See the property receipt for details.

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.

\*\*\*\*\* N A R R A T I V E # 15 \*\*\*\*\*  
NA Reported By: RECAREY, JOSEPH 11/08/05  
Entered By.: ALTOMARO, NICKIE A. 11/08/05

On November 1, 2005, I was contacted by Atty. Gus Fronstin, who advised he was willing to assist with the investigation. Atty. Fronstin 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. Fronstin 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 [REDACTED] 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..

\*\*\*\*\* N A R R A T I V E # 16 \*\*\*\*\*  
NA Reported By: RECAREY, JOSEPH 11/10/05  
Entered By.: ALTOMARO, NICKIE A. 11/10/05

On November 7, 2005, I made telephone contact with [REDACTED] who advised she would be able to meet with me at her home. Det. Sandman and I traveled to her home in Royal Palm Beach and made contact with [REDACTED]. During a sworn taped statement, [REDACTED] stated she met Jeffrey Epstein through Haley Robson. Robson would approach females who wished to work for him. [REDACTED] stated she was asked to work for him but declined. [REDACTED] explained that work means give massages. She was asked about any formal training in providing massages to which she said no. [REDACTED] said she accompanied Robson and other females



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who were taken to Epstein's house to provide massages. [REDACTED] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied Robson with [REDACTED] the 14-year-old victim, and [REDACTED]. 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. [REDACTED] stated Robson 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. [REDACTED] 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. [REDACTED] 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..

\*\*\*\*\* N A R R A T I V E # 17 \*\*\*\*\*

NA

Reported By: RECAREY, JOSEPH  
Entered By.: ALTOMARO, NICKIE A.

11/10/05  
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Det. Dawson and I attempted contact with [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, [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 on going 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, [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, [REDACTED] took [REDACTED] [REDACTED] also attended [REDACTED] High School and was familiar with Epstein.

[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. [REDACTED] stated Epstein came in the room, wearing only a towel, and laid on the table. [REDACTED] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [REDACTED] stated that on the first massage she provided she did not remove her

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clothing. [REDACTED] stated she had returned several times after that. Each time she returned more things happened. [REDACTED] 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. [REDACTED] 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. [REDACTED] added she has no formal training in providing a massage. [REDACTED] stated she brought two females during her visits to provide massages. [REDACTED] stated she brought a girl named [REDACTED] and [REDACTED] from [REDACTED] High School. [REDACTED] stated she received \$200.00 for each girl she brought. Additionally, [REDACTED] was given \$200.00 for taking her in the very beginning. The interview was concluded and the tape was placed into evidence.

Investigation continues...

\*\*\*\*\* N A R R A T I V E # 18 \*\*\*\*\*  
NA Reported By: RECAREY, JOSEPH 11/13/05  
Entered By.: ALTOMARO, NICKIE A. 11/14/05

On November 8, 2005, I made telephone contact with [REDACTED] W/F, [REDACTED] 1987, at her residence. [REDACTED] 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, [REDACTED] stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [REDACTED]. [REDACTED] had asked her if she wanted to make money providing massages to Epstein. [REDACTED] had heard that several girls from [REDACTED] High School were doing this and making money. She agreed and was taken to the house by [REDACTED]. [REDACTED] 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. [REDACTED] left the room and waited downstairs for [REDACTED]. [REDACTED] stated Epstein entered the room wearing a towel and she provided a massage wearing only her thong panties. [REDACTED] 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 [REDACTED] received \$200.00 for bring [REDACTED] to Epstein.

[REDACTED] 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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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. [REDACTED] stated on one occasion, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. [REDACTED] 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. [REDACTED] received \$350.00 for her massage. I asked her if she had any formal training in providing massages, [REDACTED] stated she did not.

[REDACTED] continued to state on one other occasion, Epstein introduced his assistant, Nada, into the massage. Nada was brought into room with [REDACTED] 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 [REDACTED]s vagina as she provided the massage.

[REDACTED] stated the last time she spoke with anyone at the house, was with Sarah during the weekend of October 2 or 3, 2005. [REDACTED] 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 [REDACTED] in Boynton Beach, Florida in hopes to interview Juan Alessi, the former houseman of Epstein's home. As no one was home, a business card was left for him to return my call. We then traveled to [REDACTED] in Miami in hopes to interview Alfredo Rodriguez, a former house man 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]. [REDACTED] was re interviewed, as she still was in possession of the rental car that Epstein had acquired for her. [REDACTED] 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. [REDACTED] was asked if she had any additional contact with either Epstein or anyone from his organization. [REDACTED] stated she did not, other than the telephone call informing her that she could keep the car for an extra month. [REDACTED] 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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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.

\*\*\*\*\* N A R R A T I V E # 19 \*\*\*\*\*

NA

Reported By: RECAREY, JOSEPH

11/15/05

Entered By.: ALTOMARO, NICKIE A.

11/16/05

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. [REDACTED] 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]. [REDACTED] stated [REDACTED] brought her into the house and she was introduced to a girl named Sarah. Once she met her, Sarah 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. ██████████ was asked if she ever removed her clothing to provide a massage. ██████████ stated it was not until the third time she went that she removed her clothing. ██████████ 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. ██████████ 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. ██████████ stated she knew he was masturbating himself as she providing the massage. ██████████ stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. ██████████ 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. ██████████ 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. ██████████ stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. ██████████ stated her boyfriend was in the car waiting for her. ██████████ 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. ██████████ advised she had no formal training in provide any massages. ██████████ 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 ██████████ at ██████████. She agreed to meet with me at a public place. I suggested she come to the police station for an interview. ██████████ 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.

\*\*\*\*\* N A R R A T I V E # 20 \*\*\*\*\*  
NA Reported By: SANDMAN, JENNIFER R. 11/16/05  
Entered By.: ALTOMARO, NICKIE A. 11/17/05

On 10/20/2005, I assisted executing a search warrant at 358 E1 Brillo Way in the Town of Palm Beach, Palm Beach County Florida under the direction of affiant Detective Joe Recarey.

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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.

\*\*\*\*\* N A R R A T I V E # 21 \*\*\*\*\*  
NA Reported By: RECAREY, JOSEPH 11/17/05  
Entered By.: ALTOMARO, NICKIE A. 11/17/05

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On November 15, 2005, Det. Sandman and I traveled to [REDACTED] in Royal Palm Beach. We met with [REDACTED], a seventeen-year old juvenile who was not in school this day due to a cold from which she was suffering. [REDACTED] was 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. [REDACTED] on his cell phone and explained to him that Det. Sandman and I were there to speak with her. I spoke with Mr. [REDACTED] on the telephone and informed him I needed to speak with his daughter in reference to an ongoing investigation. Mr. [REDACTED] advised he had no problem with us speaking with his daughter.

During a sworn taped statement, [REDACTED] stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by [REDACTED] who informed her that she could make monies providing a massage to Epstein for \$200.00. [REDACTED] had informed her that she would have to provide this massage topless. [REDACTED] made the arrangements with Epstein and his assistants and took [REDACTED] to the house. [REDACTED] stated [REDACTED] and she entered through a glass door that led into a kitchen. [REDACTED] took her upstairs, to a master bedroom and master bathroom. She recalled the bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [REDACTED] and [REDACTED] removed their clothing remaining only in thong underwear. She further stated that Epstein lay on his chest on the table. Epstein selected which oils to use for the massage. Both [REDACTED] and [REDACTED] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [REDACTED] wait downstairs in the kitchen area for [REDACTED]. Epstein instructed [REDACTED] to finish the massage. As [REDACTED] got dressed, [REDACTED] starting rubbing his chest. [REDACTED] left the room, and Epstein began masturbating himself as [REDACTED] rubbed Epstein's chest. [REDACTED] stated he continued masturbating until he climaxed 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 [REDACTED] the massage was done and to get dressed and met with him downstairs. [REDACTED] got dressed and met with Epstein in the kitchen area. She was paid \$200.00 dollars for providing the massage. [REDACTED] stated she was aware that [REDACTED] also received monies for the same thing.

The second time she went to the house she was again approached by [REDACTED]. [REDACTED] asked if she wanted to return to the house to provide another massage; [REDACTED] agreed and the arrangements were made by [REDACTED] for her to return to the house. [REDACTED] stated [REDACTED] 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. [REDACTED] 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.

\*\*\*\*\* N A R R A T I V E # 22 \*\*\*\*\*  
NA Reported By: RECAREY, JOSEPH 11/17/05  
Entered By.: ALTOMARO, NICKIE A. 11/17/05

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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respond to any other questions. When I asked her what happened at the house, [REDACTED] 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 Nadia or Nada to have vaginal intercourse with [REDACTED]. 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.

[REDACTED] could not provide exact dates as she had been to the house so many times. [REDACTED] 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.

[REDACTED] 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. [REDACTED] 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. [REDACTED] declined stating that she does what she does and did not want to introduce anyone else to do what she does. [REDACTED] stated she had never received any formal training in providing massages.

I showed [REDACTED] 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: RECAREY, JOSEPH 11/29/05  
Entered By.: ALTOMARO, 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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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.

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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.

\*\*\*\*\* N A R R A T I V E # 24 \*\*\*\*\*  
NA Reported By: RECAREY, JOSEPH 11/29/05  
Entered By.: ALTOMARO, 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. Dershorwitz 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.

\*\*\*\*\* N A R R A T I V E # 25 \*\*\*\*\*

NA

Reported By: RECAREY, JOSEPH

12/15/05

Entered By.: ALTOMARO, NICKIE A.

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 numbers 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 [REDACTED] 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.

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On December 9, 2005, I received a telephone call from [REDACTED] [REDACTED]'s mother, who was made aware of the on going 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] [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 [REDACTED] 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 [REDACTED] 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. He

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requested she remove her pants and shirt. [REDACTED] removed her shirt and pulled her pants off. [REDACTED] stayed in her bra and thong panties. As she finished the small or the back, Jeff then turned onto his back. He instructed she rub his chest and pinch his nipples. As she began to rub his chest, Jeff asked her questions about herself.

[REDACTED] remembered telling him she attended [REDACTED] High School. Jeff asked her if she was sexually active. Before [REDACTED] could answer, he also asked what sexual positions does she enjoy. [REDACTED] stated she was shy didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [REDACTED] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [REDACTED] said "no, I don't like that." Epstein then removed his towel and lay on the bed naked exposing his penis to [REDACTED]. He began touching his penis and masturbated as he touched her breasts. [REDACTED] explained Jeff then touched her vagina area by rubbing her vagina with his fingers on the outside of her thong panties. [REDACTED] tensed up and stated Jeff was aware that she was uncomfortable.

[REDACTED] 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. [REDACTED] 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. [REDACTED] stated he rubbed her real hard as he was masturbating. [REDACTED] 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 [REDACTED] 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 [REDACTED] stated she did not. [REDACTED] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She stated she no longer speaks to [REDACTED] because she was upset that [REDACTED] 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...

\*\*\*\*\* N A R R A T I V E # 26 \*\*\*\*\*  
NA Reported By: DICKS, ALLEN C. 12/18/05  
Entered By.: ALTOMARO, NICKIE A. 12/19/05

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On 102005 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 CSEU 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 CSEU personnel.

This concludes my involvement in this case.

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\*\*\*\*\* N A R R A T I V E # 27 \*\*\*\*\*  
NA Reported By: KRAUEL, CURTIS D. 12/21/05  
Entered By.: ALTOMARO, NICKIE A. 12/21/05

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.

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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.

\*\*\*\*\* N A R R A T I V E # 28 \*\*\*\*\*  
NA Reported By: RE CAREY, JOSEPH 12/21/05  
Entered By.: ALTOMARO, NICKIE A. 12/21/05

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 SG 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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cellular phone [REDACTED] 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 [REDACTED]. 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](http://www.rileykiraly.com) which also showed various cases in which they assisted. I also located another web site under [www.coralspringssparklandrotary.org](http://www.coralspringssparklandrotary.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 [REDACTED] 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](http://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](http://www.myspace.com) page and decorate the page any way one wishes. I found the following people have [myspace](http://www.myspace.com) sites: Haley Robson, [REDACTED]

I received a Cingular Wireless packet which contained a CD which contained the results of the subpoena request for verbatim calls on [REDACTED]. An analysis will be conducted in the near future on the phone numbers called.

Investigation Continues.

\*\*\*\*\* N A R R A T I V E # 29 \*\*\*\*\*  
NA Reported By: RECAREY, JOSEPH 12/27/05  
Entered By.: ALTOMARO, NICKIE A. 12/29/05

Upon doing research on the message books recovered in the search warrant, I located the identity of [REDACTED]. The telephone number [REDACTED] was registered to [REDACTED]. She currently is seventeen years old and is attending the [REDACTED] Academy. I

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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: RECAREY, JOSEPH 1/03/06  
Entered By.: ALTOMARO, NICKIE A. 1/03/06

On December 29, 2005, I received a facsimile from National Compliance

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Center from Cingular Wireless for telephone number [REDACTED] (continued)  
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] s parents. I will attempt to establish contact with them during the evening hours.

I received a package from Atty. Guy Fronstin, 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 "[REDACTED] Fucking [REDACTED]" still attends [REDACTED] 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. She also describes using marijuana with her 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 Belohlavic 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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contact Mr. Dershowitz.

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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.

\*\*\*\*\* N A R R A T I V E # 31 \*\*\*\*\*  
NA Reported By: MINOT, LORI S. 1/03/06  
Entered By.: ALTOMARO, NICKIE A. 1/03/06

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 Caddy 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

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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 Ford 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.

\*\*\*\*\* N A R R A T I V E # 33 \*\*\*\*\*

NA Reported By: RECAREY, JOSEPH 1/05/06  
Entered By.: ALTOMARO, NICKIE A. 1/05/06

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.

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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 (masseuse) several hundred dollars for their time and to notify Epstein the amount they were given. Epstein also ordered Rodriguez to

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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 he 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 Continuesàà

\*\*\*\*\* N A R R A T I V E # 34 \*\*\*\*\*  
NA Reported By: RECAREY, JOSEPH 1/09/06  
Entered By.: ALTOMARO, NICKIE A. 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 [REDACTED] 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



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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]. [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], [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.

\*\*\*\*\* N A R R A T I V E # 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 Venero of [REDACTED]

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[REDACTED] West Palm Beach. Research conducted on Venero revealed she is a licensed Massage therapist with a Florida conditional/active license number [REDACTED]. 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 [REDACTED] is assigned to Thomas Rofrano of [REDACTED] 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 [REDACTED], 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 [REDACTED]. Mr. [REDACTED] has two daughters, [REDACTED] is currently residing in Connecticut and [REDACTED] is residing with her father in Lake Worth. Research on [REDACTED] 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.

\*\*\*\*\* N A R R A T I V E # 36 \*\*\*\*\*

NA Reported By: RECAREY, JOSEPH 1/23/06  
Entered By.: ALTOMARO, NICKIE A. 1/23/06

On January 19, 2006, Det. Caristo and I met with Johanna Sjoberg at [REDACTED] in 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 Ghaline 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 went to Palm Beach Atlantic College. 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

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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, [REDACTED] 1987, resides at [REDACTED] [REDACTED] has a my space page called [REDACTED] In her web page, shows various photos of [REDACTED] 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.

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\*\*\*\*\* N A R R A T I V E # 37 \*\*\*\*\*

NA

Reported By: RECAREY, JOSEPH

1/30/06

Entered By.: ALTOMARO, NICKIE A.

1/30/06

On January 25, 2006, Det Caristo and I. responded to [REDACTED] and met with [REDACTED]. [REDACTED] stated last year, when she was seventeen years of age, she met Jeffrey Epstein through her former room mate [REDACTED]. [REDACTED] was allegedly dating Epstein at the time. [REDACTED] and [REDACTED] had once cohabitated together when they modeled. [REDACTED] explained [REDACTED] called her on her telephone and advised her that she was in Palm Beach and requested to see her. [REDACTED] made arrangements to meet with her at Epstein's house. [REDACTED] arrived and met Epstein and [REDACTED] and [REDACTED] went to the Palm Beach Mall together and went shopping. [REDACTED] advised that [REDACTED] 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. [REDACTED] advised she purchased one item and [REDACTED] purchase various items. The money used to purchase the items was the money given by Epstein.

[REDACTED] and [REDACTED] continued shopping and having a day together. [REDACTED] stated [REDACTED] explained how she and Epstein have been dating each other and he has been paying all of her bills. [REDACTED] claimed [REDACTED] 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 [REDACTED] about her modeling career. He knew of her modeling career from [REDACTED]. He requested to see her modeling portfolio and explained that he could help her with modeling jobs. [REDACTED] had her book with her to show [REDACTED] and showed the book to Epstein. He commented negatively about her photographs and portfolio. [REDACTED] 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. [REDACTED] took out the undergarments which were purchased. She immediately showed Epstein different sets purchased. Epstein then requested to view what [REDACTED] purchased. [REDACTED] 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. [REDACTED] looked at [REDACTED] 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. [REDACTED] returned into the room and told [REDACTED] she would be going home. [REDACTED] scheduled another day for [REDACTED] to return for massages with her.

[REDACTED] stated within that same week, she returned to meet with [REDACTED] and have a massage. [REDACTED] had told her that she would be unable to stay with her as she would be going on a bike ride with Epstein. [REDACTED] 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 her for their time.

\*\*\*\*\* N A R R A T I V E # 38 \*\*\*\*\*

NA Reported By: RECAREY, JOSEPH 1/31/06  
Entered By.: ALTOMARO, NICKIE A. 1/31/06

On January 27, 2006, 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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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.

\*\*\*\*\* N A R R A T I V E # 39 \*\*\*\*\*  
NA Reported By: RECAREY, JOSEPH 2/14/06  
Entered By.: ALTOMARO, NICKIE A. 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 [REDACTED] 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]



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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..

\*\*\*\*\* N A R R A T I V E # 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 MAACO 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 boyfriend's business, Blanton Automotive. Det Caristo and I left the area and returned to the police station.

Investigation continues.

\*\*\*\*\* N A R R A T I V E # 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



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located [REDACTED] in Royal Palm Beach. I responded to [REDACTED] located [REDACTED] Royal Palm Beach. During the interview, [REDACTED] stated she knew I would be speaking with her. [REDACTED] stated she was first introduced to Epstein when she turned eighteen years old. [REDACTED] stated she was sure of her age as it was her senior year in [REDACTED] 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, [REDACTED]. She stated she went upstairs with Sarah while Epstein got ready for the massage. He exited his bathroom naked and [REDACTED] turned around. Epstein asked her if being naked offended her. [REDACTED] stated it made her uncomfortable. Epstein then put on a towel and lay on the table. [REDACTED] stated she rubbed his back and feet. She stated she had no massage training or experience. [REDACTED] stated during the massage, Epstein attempted to touch her buttocks. [REDACTED] 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. [REDACTED] never returned to the house. She did advise of one time she went with [REDACTED] however she waited in the car for [REDACTED] as she did not want to go into the house. At the conclusion of [REDACTED]'s visit with Epstein they left the area. [REDACTED] 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 [REDACTED] did not have any other information to provide.

I then learned from the original victim, [REDACTED] 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 [REDACTED]. 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.

\*\*\*\*\* N A R R A T I V E # 42 \*\*\*\*\*  
NA Reported By: RECARBY, JOSEPH 4/14/06  
Entered By.: ALTOMARO, NICKIE A. 4/18/06

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 [REDACTED] who had informed me that the private investigators were still photographing the family. On April

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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]. [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

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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. Belohlavic 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 Belohlavic'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.

\*\*\*\*\* N A R R A T I V E # 43 \*\*\*\*\*  
NA Reported By: RECAREY, JOSEPH 5/04/06  
Entered By.: ALTOMARO, NICKIE A. 5/04/06

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

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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.

\*\*\*\*\* N A R R A T I V E # 44 \*\*\*\*\*

NA

Reported By: RECAREY, JOSEPH  
Entered By.: ALTOMARO, NICKIE A.

5/15/06  
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, PBIA. 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 F30QQF. 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.

\*\*\*\*\* N A R R A T I V E # 45 \*\*\*\*\*

NA

Reported By: RECAREY, JOSEPH

6/05/06



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Entered By.: ALTOMARO, NICKIE A.

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6/06/06

On May 22, 2006, I received several phone calls throughout the day from Mr. [REDACTED] who stated he had been followed aggressively by a private investigator. Mr. [REDACTED] 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. [REDACTED] 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. [REDACTED] 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. [REDACTED] 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. [REDACTED] to run off the road. Mrs. [REDACTED] 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.

Date	Time	Seconds	In/Out	To/From
7-Mar-06	11:03 AM	492	Outbound	561XXXX
7-Mar-06	11:16 AM	6	Inbound	561XXXX
7-Mar-06	11:22 AM	887.2	Inbound	561XXXX
7-Mar-06	11:37 AM	48	Outbound	[REDACTED]
7-Mar-06	11:39 AM	28.2	Inbound	[REDACTED]
7-Mar-06	12:02 PM	727.2	Inbound	[REDACTED]

table reflects the date of the calls, time of day (EST), duration

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Time: 8:47:53

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of call in seconds, inbound or outbound calls and calls made to or from [REDACTED]'s 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.

\*\*\*\*\* N A R R A T I V E # 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 Krisher made the determination to go 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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# EXHIBIT 40

## (Filed Under Seal)

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Jeffrey Epstein  
358 El Brillo Way  
Palm Beach, Florida 33480  
USA

**Billing Address:**

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358 El Brillo Way  
Palm Beach, Florida 33480  
USA



rbrd57708/-3-/next/2436223 SORTExtFastTrack

Your order of September 4, 2005 (Order ID 103-1737820-4508648)

Qty.	Item	Item Price	Total
IN THIS SHIPMENT			
1	SM 101: A Realistic Introduction Wiseman, Jay --- Paperback (** C-2 **) 0963976389	\$16.47	\$16.47
1	Slave Craft: Roadmaps for Erotic Servitude---Principles, Skills and Tools Baldwin, Guy --- Paperback (** C-2 **) 1881943143	\$15.95	\$15.95
1	Training With Miss Abernathy: A Workbook for Erotic Slaves and Their Owners Abernathy, Christina --- Paperback (** C-2 **) 1890159077	\$11.95	\$11.95

Subtotal	\$44.37
Shipping & Handling	\$24.46
Order Total	\$68.83
Paid Via Amex	\$68.83
Balance due	\$0.00

This shipment completes your order.

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# EXHIBIT 41

## (Filed Under Seal)

DEPOSITION  
EXHIBIT

6-3-16 JAW

PENGAD 800-631-6989

Date to File	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To						
5 11/5/90	G11590	N908JE	PBI	TNCM		802	JE, GM	1/1	24	
7 11/5/90	G11590	"	TNCM	TEB		803	JE, GM	1/1	40	
9 11/5/90	"	"	TEB	PBI		804	JE, GM, SHARON REYNOLDS	1/1	21	
12 11/5/90	"	"	PBI	TEB		805	JE, GM, SHARON REYNOLDS	1/1	21	
15 11/5/90	"	"	TEB	BCT		806	JIMMY COYNE, MRS. COYNE, BUNNIE COYNE, WENDY COYNE, KAREN BUNNIE, SCHOLIE BUNNIE, JIMMY COYNE, MRS. COYNE, BUNNIE COYNE, WENDY COYNE, KAREN BUNNIE, SCHOLIE BUNNIE	1/1	24	
19 11/5/90	"	"	BCT	TEB		807	JE, GM, AS, SORIE BIDDLE	1/1	23	
23 11/5/90	"	"	TEB	PBI		808	JE, GM, AS, SORIE BIDDLE	1/1	22	
28 11/5/90	"	"	PBI	TEB		809	JE, GM, AS, SORIE BIDDLE, MARISA	1/1	24	
31 11/5/90	"	"	TEB	PBI		810	JE, GM, AS, SORIE BIDDLE, MARISA	1/1	26	
8 11/5/90	"	"	PBI	TEB		811	JE, GM, AS, CHRISTINE, 1 FEMALE	1/1	23	
11 11/5/90	"	"	TEB	PBI		812	JE, GM, AS, 1 FEMALE	1/1	21	
15 11/5/90	"	"	PBI	CMH		813	JE, GM, AS, CLARE HAZEL, FEMALE	1/1	21	
18 11/5/90	"	"	CMH	TEB		814	JE, GM, AS	CONFIDENTIAL DR 000002	21	
22 11/5/90	"	"	TEB	PBI		815	JE, FRANCES, SORIE BIDDLE, GVA, & 4 BPS	23	23	
24 11/5/90	"	"	PBI	TEB		816	JE, GVA, PABY, & 3 PAB	23	23	
26 11/5/90	"	"	TEB	VNY		817	JE	55	55	
29 11/5/90	"	"	VNY	SAF		818	JE	15	15	
29 11/5/90	"	"	PBI	TEB		821	JE, GVA, AS, GVA, GLENN, CARRA, MAMA	21	21	
19 11/5/90	"	"	TEB	TEB		821	JE, GVA, AS, GVA, GLENN, CARRA, MAMA	10	10	
19 11/5/90							4210 SIMULATED, INITIAL TRAINING			
Page Total							6/4	53	8	
Amount Forward							580	650	602	8
Total to Date							580	650	602	6

I certify that the statements made by me on this form are true.

Plot's Signature: *David Rodriguez*

David Dodge



Date 18/07	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		...and Class			
			From	To					APR PLANE					
30	G1159B	N908JC	TEB	PBI		847	IC		2	0	SEL MEL			
30	"	"	PBI	TEB		848	IC, PAULA ESKER, ALISSON, SYRACUS, TEFANY	1/1	2	5	2			
5	"	"	TEB	PBI		849	IC, ALISSON, CHERICE, COLUMA	1/1	2	3	2			
18	"	"	PBI	TEB		850	NO 885, SANGERS, JIM WICKERMAN	1/1	2	2	2			
19	"	"	TEB	PBI		851	IC, GM		2	1	2			
24-27	"	SEMI-ANALOG	SAV	SAV			RECURRENT TRAINING		6	0	2			
30	"	N908JE	SAC	CMH		860	IC, GM	1/1	2	5	6			
10	"	"	CMH	TEB		861	IC, GM, IRA EICHENMAN	1/1	1	2	2			
12	"	"	TEB	MVY		862	IC	1/1	6		1			
12	"	"	MVY	TEB		863	IC		9					
12	"	"	TEB	PBI		864	IC, GM		2	4				
15	"	"	PBI	TEB		865	IC, GM				2			
16	"	"	TEB	PBI		866	IC, COLUMA	1/1	2	3	2			
17	"	"	PBI	SAV		867	OPS 1 INSPECTION	1/1	9		2			
18	"	"	SAV	GVR		868	OPS 1 INSPECTION	1/1	1	7	1			
19	"	"	PBI	TEB		873	IC, GM, ANDY, MANN, RAULPH	1/1	2	3	2			
14	"	"	TEB	TVC		874	IC, GM	1/1	1	5	1			
16	"	"	TVC	TEB		875	IC, GM	1/1	1	4	1			
18	"	"	TEB	MVY		876	IC, DANGER, KATHY, KELLY, TAYLOR, 2 PAX	1/1	6		1			
I certify that the statements made by me on this form are true.											Page Total Amount Forward Total to Date	13/12 5846/561 5859/513	375 67026 6740	2116 5458 5462

CONFIDENTIAL DR 000804

Pilot's Signature: *David Rodriguez*

Date 1946	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category--	...and Class
			From	To						
18	G1159B	N90854	MVY	TEB		877	JE, DANIEL ROTHMAN, BELLEFANT	1/1	AB	SEL
18	"	"	TEB	PBI		878	JE, CECILIA MIDDLEBART	1/1	2	
21	"	"	PBI	JAN		879	JE, GM, ROSEN PLANT	1/1	17	
21	"	"	JAN	SAF		880	JE, GM, ROSEN PLANT	1/1	19	
26	"	"	SAF	PBI		881	JE, GM, ROSEN PLANT	1/1	33	
26	"	"	PBI	TEB		882	JE, GM	1/1	23	
27	"	"	TEB	BEO		883	JE	1/1	6	
27	"	"	BEO	PVD		884	JE	1/1	3	
27	"	"	PVD	CMH		885	JE	1/1	15	
28	"	"	CMH	DCA		886	JE, 1 MARG, 1 GEMBL	1/1	7	
28	"	"	DCA	CMH		887	JE, JOAN GLENN, ALAN DERSHOWITZ	1/1	8	
28	"	"	CMH	TEB		888	JE, ALAN DERSHOWITZ	1/1	CONFIDENTIAL DR_000005	
29	"	"	TEB	BOS		889	ALAN DERSHOWITZ	1/1	8	
29	"	"	BOS	TEB		890	RETURN TO TEB	1/1	2	
12	"	"	TEB	PBI		891	JE, CECILIA MIDDLEBART	1/1	23	
18	"	"	PBI	TEB		892	JE, GM	1/1	21	
20	"	"	TEB	PBI		893	JE, GM	1/1	2	
23	"	"	PBI	BEO		894	JE, GM	1/1	6	
23	"	"	BEO	TEB		895	JE, GM	16/15	286	
							Page Total	5859	6746	
							Amount Forward	5859	6746	
							Total to Date	5859	6746	

I certify that the statements made by me on this form are true.

David Rodger

Pilot's Signature

Date is SEC	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miss Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To				
26	G1159B	N908JE	TEB	CMH	896	JE	1/1	12
26	"	"	CMH	PBI	897	JE		19
26	"	"	PBI	TEB	900	JE, GM, DIDIER	1/1	24
10	"	"	TEB	PBI	902	JE		25
14	"	"	PBI	TEB	903	JE, 1 FEMALE	1/1	24
15	"	"	TEB	CMH	904	TO CMH FOR PICK-UP	1/1	12
15	"	"	CMH	TEB	905	JE, DIDIER, JESSE SCHWARTZ	1/1	12
19	"	"	TEB	PBI	906	JE, DIDIER, JESSE SCHWARTZ	1/1	23
22	"	"	PBI	TEB	907	JE, GM, DIDIER, CATRUDUNE	1/1	23
24	"	"	TEB	SAF	908	JE, GM, LARRY	1/1	41
25	"	"	SAF	PBI	909	JE, GM, SHANNON	1/1	CONFIDENTIAL DR 000006
27	"	"	PBI	TEB	910	JE, GM, JOE PDSACOM, SHANNON	1/1	24
30	"	"	TEB	DCA	911	JE, ANNA STEWART, LESLIE GELB	1/1	6
30	"	"	DCA	TEB	912	JE, ANNA STEWART, LESLIE GELB, 3 PM	1/1	6
31	"	"	TEB	PBI	913	JE, GM, DIDIER, CATRUDUNE	1/1	22
Nov 4	"	"	PBI	TEB	914	JE, GM, DIDIER, CATRUDUNE	1/1	25
7	"	"	TEB	PBI	915	JE, ANNA STEWART, LESLIE GELB, 4 PM	1/1	22
11	"	"	PBI	TEB	916	JE, ANNA STEWART, LESLIE GELB, 4 PM	1/1	22
15	"	"	TEB	CMH	917	JE, GM, DIDIER, CATRUDUNE	1/1	13

I certify that the statements made by me on this form are true.

Pilot's Signature: *David Rodriguez*

Page Total	11/9	387
Amount Forward	5875	6768
Total to Date	5886	6807



David Lodge



$$\frac{2116}{2116}$$

certify that the statements made by me on this form are true.

Pilot's Signature

David Dodge

Primo Total

Annual Estimated

Total to Date

6


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211

Date to 17 MAR	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ARR	DEP
10	G-115910	N908JE	VNC	PBI	956	956	JE	1/1	4	
15	"	"	PBI	DCA	957	957	JE, CELINA MIDELEARS	1/1	1	7
15	"	"	DCA	IAD	958	958	REP REPOSITION FOR CURSEW		2	
15	"	"	IAD	PBI	959	959	JE, CELINA MIDELEARS		2	0
24	"	"	PBI	TEB	960	960	JE, GMA, SUIZINNA, JOEL PASCHAU	1/1	2	3
27	"	"	TEB	PBI	961	961	JE, GM, DINDIE CARADUNGE		2	1
30	"	"	PBI	SAC	962	962	JE, GM, PSPIER CARADUNGE		3	7
APR	"	"	SAC	CMH	963	963	JE, GM, DC	1/1	2	4
2	"	"	CMH	TEB	964	964	JE, GM, DC		1	1
10	"	"	TEB	PBI	965	965	JE, DC, DCA, 2 FEMALE, 1 MALE		2	2
15	"	"	PBI	DCA	966	966	JE, GM, DC, MANN, GUY, DCA, 1 MALE, 1 FEMALE	1/1	2	0
15	"	"	DCA	TEB	967	967	JE, DC, GUY, DCA, 1 MALE	CONFIDENTIAL DR 1000009		
17	"	"	TEB	PBI	968	968	JE, GM, DC, GUY, DCA, 1 MALE, 1 FEMALE	1/1	2	4
21	"	"	PBI	TEB	969	969	JE, DC, MANN, DCA, 1 MALE	1/1	2	2
21	"	"	TEB	BGD	970	970	JE	1/1	5	
21	"	"	BGD	TEB	971	971	JE		7	
22	"	"	TEB	PBI	972	972	JE		2	3
27	"	"	PBI	TEB	973	973	JE, CELINA MIDELEARS	1/1	2	4
MAY	"	"	TEB	EGGW	974	974	JE, GM	1/1	6	5
						Page Total		9/9	378	
						Amount Forward		5404	6887	2
						Total to Date		5418	69250	

I certify that the statements made by me on this form are true.

Pilot's Signature  
David Rodolphe

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SEL

Date 10/17 MAY	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miss Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To					
5	GI159B	N908JE	EGGW	LSGG	975	JE	JE	1/1	1
5	"	"	LSGG	LFPB	976	JE	JE	1/1	7
6	"	"	LFPB	CYJT	977	JE, GM	JE, GM	1/1	5
6	"	"	CYJT	TEB	978	JE, GM	JE, GM	1/1	2
9	"	"	TEB	SAF	979	JE, GM, NADJA	JE	1/1	3
12	"	"	SAF	VNY	980	JE	JE	1/1	1
14	"	"	VNY	SAF	981	JE, SOPHIE BIDDLE	JE	1/1	1
15	"	"	SAF	DFW	982	JE, GM, SOPHIE BIDDLE, JACK ROBERTSON	JE	1/1	1
15	"	"	DFW	PBI	983	JE, SOPHIE BIDDLE	JE	1/1	2
23	"	"	PBI	JFK	984	REGRESSION TO JFK	JE	1/1	2
24	"	"	JFK	PBI	985	JE, LYNNA MIDDLEBERRY, GINGER SOUTHWORTH	JE	1/1	2
24	"	"	PBI	TEB	986	JE, MANDY	JE	1/1	2
5	"	"	TEB	PBI	987	JE, GM, DENIER	JE	1/1	2
9	"	"	TEB	TEB	988	JE, GM	JE	1/1	2
21	"	"	TEB	MVY	989	JE, LYNN FORESTER, HEATHER MANN ROSS, KATIE	JE	1/1	6
21	"	"	MVY	PBI	990	JE, HEATHER MANN	JE	1/1	2
23	"	"	PBI	CMH	991	JE, HEATHER	JE	1/1	2
23	"	"	CMH	TEB	992	JE	JE	1/1	1
27	"	"	TEB	PBI	993	JE, GM	JE	1/1	2
I certify that the statements made by me on this form are true.									
David Rodriguez									
Pilot's Signature									
Page Total									13/13
Amount Forward									393
Total to Date									69250
									69643

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Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	...and Class
18 4 17 JUL			From To					ABOVE	SEL
1	G-1159B	N908JE	PBI TEB	994	994	JE, GM, PAULA ERSTEIN	1/1	25	
10	"	"	CMH SAF	999	999	JE, GM, PAULA ERSTEIN	1/1	30	
16	"	"	PBI SAF	1000	1000	JE, GM, PAULA ERSTEIN		32	
22	"	SPAWGLER	DFW HOU			SPAWGLER - STEEP ROLLS, VSO, VSI, SET UPSET (WAVE TURBULENCE)		30	
23	"	"	TEB HON			WINTER OPERATIONS ELECTRICAL, SPARE ENGINE, RTO		30	
24	"	"	DFW COS			HIGH ALTITUDE, HYDRAULICS EMERGENCY DESCENT WIND SHOCK	4/4	30	
13	C-421B	N908GM	ZOR- SAF ZOR	57	57	4 TAKE OFF + LANDING		7	
15	"	"	ZOR SAF	58	58		1/1	2	
Aug 1	"	"	SAF ZOR	59	59	KRISTY RODRIGUES	1/1	4	
9	G-1159B	N908JE	PBI TVC	1012	1012	JE, GM	1/1	27	
10	"	"	TVC TEB	1013	1013	JE, GM	1/1	25	
13	"	"	TEB PBI	1014	1014	JE, HEATHER MANN	1/1	25	
17	"	"	PBI MVY	1015	1015	JE, HEATHER MANN	1/1	25	
17	"	"	MVY TEB	1016	1016	JE, CELINA MODOG FART	1/1	7	
20	"	"	TEB SAF	1017	1017	JE, CELINA MODOG FART, CELINA MODOG FART		39	
23	"	"	SAF TEB	1018	1018	JE, CELINA MODOG FART, CELINA MODOG FART	1/1	35	
24	"	"	TEB FOK	1019	1019	REPUSITION	1/1	5	
24	"	"	FOK MVY	1020	1020	JE, CELINA MODOG FART		4	
25	"	"	MVY PBI	1021	1021	JE, CELINA MODOG FART	1/1	26	
I certify that the statements made by me on this form are true.							15/14	396	
David Rodriguez							5921	69643	2116 5
							5946	70039	2116 5
							5698		



Date 1947 SEP	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category--	
			From	To					ARRIVAL	2116
1	G1159B	N908JE	TEB	TEB	1022	1022	JE, HEATHER MANN	1/1	2	6
2	"	"	TEB	CMH	1023	1023	ROBERTSON	1/1	1	2
3	"	"	CMH	TEB	1024	1024	STEVE & IVORY TUCKERMAN	1/1	1	2
3	"	"	TEB	LFB	1025	1025	JE, JACOB ROBERTSON STEVE & IVORY TUCKERMAN	1/1	6	6
6	"	"	LFB	LFB	1026	1026	JE, G.M. ROBERTSON STEVE & IVORY TUCKERMAN	1/1	1	3
7	"	"	LFB	LFB	1027	1027	JE, G.M. ROBERTSON STEVE & IVORY TUCKERMAN	1/1	1	6
12	"	"	EGGW	EGGW	1028	1028	JE, G.M.		5	5
13	"	"	CMH	PBI	1029	1029	JE, G.M.		4	3
15	"	"	PBI	TEB	1030	1030	JE, G.M.	1/1	2	3
19	"	"	TEB	CMH	1031	1031	JE, HEATHER MANN, DIPPER	1/1	1	2
20	"	"	CMH	PBI	1032	1032	JE, HEATHER MANN, DIPPER	CONFIDENTIAL	DR	0000
22	"	"	PBI	SAF	1033	1033	JE, G.M. DIPPER, CLARE HAZEL	1/1	3	6
26	"	"	SAF	TEB	1034	1034	JE, G.M. DIPPER, CLARE HAZEL, AUGUST PERRY, JACK ROBERTSON, PIPER	1/1	3	5
28	"	"	TEB	PBI	1035	1035	JE, GABRIELLE		2	4
18	G1159B	N883A	SAF	SAF			TEST FLIGHTS FOR NATHAN MYRVED, SMOULDS ALL SYSTEMS	1/1	2	0
26	CESSNA 441	N908GM	20R-SAF	20R-SAF			CEC RENOVATION (1000, IL) APPROACH, PAID APPROACH	4/4	1	9
4	G1159B	N908JE	PBI	STL	1036	1036	REPRODUCTION	1/1	2	2
4	"	"	STL	PBI	1037	1037	JE, G.M.		2	2
12	"	"	PBI	TEB	1038	1038	JE, HEATHER MANN	1/1	2	9
I certify that the statements made by me on this form are true.								Page Total		
David Rodger								16/13		
File Signature								Amount Forward		
								5698		
								Total to Date		
								5711		
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Date	Aircraft Make and Model	Aircraft Identification Mark	Point of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category
19			From To					
06-5	G1159B	N908JE	TEB PBI		1039	JE, GM, CLARE, EMMY, DORIS	1	2.5
21	"	"	PBI TEB		1040	JE, GM, MANDY, EMMY, DORIS	1	2.2
21	CESSNA 441	N908GM	ZARRO SAF		57	CURRENT REQUIREMENT	4/4	
24	"	"	TEB BED		1041	JE, EMMY	1/1	7
24	"	"	BED PBI		1042	JE, EMMY	1/1	2.6
27	"	"	PBI TEB		1043	JE, GM, EMMY, TAYLER	1/1	2.1
31	"	"	TEB PBI		1044	JE, GM, ET, CLARE, EMMY, CLARE, JORDAN	1/1	2.4
NOV 2	"	"	PBI SAF		1045	JE, GM, ET, EMMY	1/1	3.8
4	"	"	SAF TEB		1046	JE, GM, ET, CLARE, EMMY, KERNY	1/1	3.4
7	"	"	TEB JAX		1047	JE, LYNN, FORESTER	1/1	1.9
7	"	"	JAX PBI		1048	JE	1/1	7
8	C-421	N908GM	PBI MIA		70	LARRY VASOS	100	CONFIDENTIAL DR_000013
24	G1159B	N908JE	PBI TEB		1049	REPOSITION TO TEB	1/1	2.3
24	"	"	TEB SAF		1050	JE, ET	1/1	3.9
25	"	"	SAF PBI		1051	JE, ET	1/1	3.0
29	"	"	PBI TEB		1052	JE, DORIS, CLARE, MICA, TAYLER, JE, PACHA, GENE		2.2
DEC 6	"	"	TEB PBI		1053	JE, GM, ET		2.2
9	"	"	PBI TEB		1054	JE, GM, ET	1/1	2.2
11	"	"	TEB PBI		1055	JE, CLARE, JORDAN, DORIS, EMMY	1/1	2.5
I certify that the statements made by me on this form are true.							Page Total	13
<p>Pilot's Signature</p> <p><i>Daniel Rodriguez</i></p>							Amount Forward	5962
							Total to Date	5913
								5721

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Date 19518 6409	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To					
1	C172	N75RR	LNA-F45	LNA			CHECKOUT IN CESSNA 172	5/5	AIRPLANE
7	C172	N75RR	LNA-X10	PBI-LNA			CHARLES WAGNER, 1 HOUR 30M, COURTESY AIRCRAFT CLUB, N75RR, 1000-1015, 1015-1030, 1030-1045, 1045-1055, 1055-1100, 1100-1115, 1115-1130, 1130-1145, 1145-1155, 1155-1200, 1200-1215, 1215-1230, 1230-1245, 1245-1255, 1255-1300, 1300-1315, 1315-1330, 1330-1345, 1345-1355, 1355-1400, 1400-1415, 1415-1430, 1430-1445, 1445-1455, 1455-1500, 1500-1515, 1515-1530, 1530-1545, 1545-1555, 1555-1600, 1600-1615, 1615-1630, 1630-1645, 1645-1655, 1655-1700, 1700-1715, 1715-1730, 1730-1745, 1745-1755, 1755-1800, 1800-1815, 1815-1830, 1830-1845, 1845-1855, 1855-1900, 1900-1915, 1915-1930, 1930-1945, 1945-1955, 1955-2000, 2000-2015, 2015-2030, 2030-2045, 2045-2055, 2055-2100, 2100-2115, 2115-2130, 2130-2145, 2145-2155, 2155-2200, 2200-2215, 2215-2230, 2230-2245, 2245-2255, 2255-2300, 2300-2315, 2315-2330, 2330-2345, 2345-2355, 2355-2400, 2400-2415, 2415-2430, 2430-2445, 2445-2455, 2455-2500, 2500-2515, 2515-2530, 2530-2545, 2545-2555, 2555-2600, 2600-2615, 2615-2630, 2630-2645, 2645-2655, 2655-2700, 2700-2715, 2715-2730, 2730-2745, 2745-2755, 2755-2800, 2800-2815, 2815-2830, 2830-2845, 2845-2855, 2855-2900, 2900-2915, 2915-2930, 2930-2945, 2945-2955, 2955-3000, 3000-3015, 3015-3030, 3030-3045, 3045-3055, 3055-3100, 3100-3115, 3115-3130, 3130-3145, 3145-3155, 3155-3200, 3200-3215, 3215-3230, 3230-3245, 3245-3255, 3255-3300, 3300-3315, 3315-3330, 3330-3345, 3345-3355, 3355-3400, 3400-3415, 3415-3430, 3430-3445, 3445-3455, 3455-3500, 3500-3515, 3515-3530, 3530-3545, 3545-3555, 3555-3600, 3600-3615, 3615-3630, 3630-3645, 3645-3655, 3655-3700, 3700-3715, 3715-3730, 3730-3745, 3745-3755, 3755-3800, 3800-3815, 3815-3830, 3830-3845, 3845-3855, 3855-3900, 3900-3915, 3915-3930, 3930-3945, 3945-3955, 3955-4000, 4000-4015, 4015-4030, 4030-4045, 4045-4055, 4055-4100, 4100-4115, 4115-4130, 4130-4145, 4145-4155, 4155-4200, 4200-4215, 4215-4230, 4230-4245, 4245-4255, 4255-4300, 4300-4315, 4315-4330, 4330-4345, 4345-4355, 4355-4400, 4400-4415, 4415-4430, 4430-4445, 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CONFIDENTIAL DR\_000017

Date is MAR	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown No.	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To					
23	G1159B	N908JE	PBI	TGB		1085	JE, GM, GVA, ANTHONY, CARLOS RECEIVED DUBAI, NIGHT, 11 AMAL	1/1	2/2
25	"	"	TGB	SAF		1086	JE, GM, ET		4/4
27	"	"	SAF	PBI		1087	JE, GM, DAVE, SHOOTING, ET	1/0	2/4
31	C172	N5189B	LNA	LNA			CHECK OUT INCESSNA IN	3/3	8
31	"	"	LNA-PBE-LNA				CHRIS WAGNER - 3 EMERGENCY LANDINGS, NIGHT REQUISITIONS RECURRENT TRAINING AT BAHAM		1/3
16	C421	SEMUL0782					EMERGENCY PROCEDURES		
17	"	"					INSTRUMENT COMPLETION CHECK		
18	"	"					JE, NEARBY MISCELLANEOUS, BARRY, MISTAKENLY LEAVING, ANTHONY, LUNAR	1/1	2/5
APR 5	G1159B	N908JE	PBI	TGB		1088	JE, 2 FEMALE (PERRY FORD)	1/1	7
6	"	"	TGB	W47		1089	JE, PAUL, MALLON, 2 FEMALE	1/1	5
6	"	"	W47	RIC		1090	JE, PAUL, MALLON, 2 FEMALE	1/1	4
6	"	"	RIC	W47		1091	JE, PAUL, MALLON, 2 FEMALE	1/1	7
6	"	"	W47	TGB		1092	JE, 2 FEMALE	1/1	6
9	"	"	TGB	BEO		1093	JE, OLIVER, SACHS	1/1	9
9	"	"	BEO	TGB		1094	JE, OLIVER, SACHS, ROBIN		2/3
9	"	"	TGB	PBI		1095	JE, GM, GVA, ANTHONY, CARLOS, DUBAI JE, GM, SACHS, WAGNER, 2 FEMALE	2/2	1/2
11	C172	N75RR	LNA-FXE-LNA			1096	CHRIS WAGNER - ANTHONY, VOR, COMPLETED EMERGENCY, CALLED AT PERRY FORD	1/1	6
16	G1159B	N908JE	PBI	MYNN		1097	JE (MAY PROGRESS, SACHS, WAGNER, ROBIN ON THE GROUND)	1/1	6
16	"	"	MYNN	PBI		1097	JE	1/1	6
I certify that the statements made by me on this form are true.									
David Rodriguez								Page Total	18
								Amount Forward	6009
								Total to Date	5748
									1161
									5762
									1184

CONFIDENTIAL DR\_000018

Date to APR	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To					
17	G1159B	N908JE	PBI	PBI		108	DEPARTURE FOR G3 ARRIVAL	1	1
17	C421	N908GM	PBI	X21			THREE WINGMEN, PASTY, KATY, KATY CONFIDENTIAL, REPORT OPERATIONS SAME AS ABOVE	1	9
17	C421	"	X21	TTX				1	1
17	"	"	TTX	CRG			KATY, KATY, PASTY, KATY SAL, CLIMB, DESCEND, TURN	1	6
18	"	"	CRG	LAL			PASTY, KATY, KATY, KATY SAL, CLIMB, DESCEND, TURN	1	8
18	"	"	LAL	PBI			THREE WINGMEN, PASTY, KATY, KATY CONFIDENTIAL, REPORT OPERATIONS SAME AS ABOVE	1	1
19	G1159B	N908JE	PBI	CMA		109	DEPARTURE FOR G3 ARRIVAL	1	2
20	"	"	CMA	LUK		110	DE, GINGER, MANDY LANE	1	3
20	"	"	LUK	TGB		111	DE, GINGER, MANDY LANE	1	1
24	"	"	TGB	PBI		112	DE, GINGER, MANDY LANE	1	2
25	C172	N75RR	LNA-PBI-LNA				THREE WINGMEN, PASTY, KATY, KATY CONFIDENTIAL, REPORT OPERATIONS SAME AS ABOVE	4	1
25	"	"	LNA	LNA			THREE WINGMEN, PASTY, KATY, KATY CONFIDENTIAL, REPORT OPERATIONS SAME AS ABOVE	6	8
26	"	"	LNA-PBI-LNA				THREE WINGMEN, PASTY, KATY, KATY CONFIDENTIAL, REPORT OPERATIONS SAME AS ABOVE	5	9
26	G1159B	N908JE	PBI	TGB		113	DE, GINGER, MANDY LANE	1	2
26	"	"	TGB	PBI		114	DE, GINGER, MANDY LANE	1	2
27	C172	N75RR	LNA-PBI-LNA				THREE WINGMEN, PASTY, KATY, KATY CONFIDENTIAL, REPORT OPERATIONS SAME AS ABOVE	1	1
3	G1159B	N908JE	PBI	TGB		115	DE, GINGER, MANDY LANE	1	2
5	"	"	TGB	BED		116	DE, GINGER, MANDY LANE	1	6
5	"	"	BED	TGB		117	DE, GINGER, MANDY LANE	1	7

I certify that the statements made by me on this form are true.

Pilot's Signature: *E. and R. and R.*

Page Total	40
Amount Forward	6034
Total to Date	6034



CONFIDENTIAL DR\_000019

Date 19 1995	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Narrations, Endorsements	Number of Landings	Aircraft Category...
7	G-1159B	N908JE	TGB To PBI		1188	JE, ES		23
9	"	"	PBI To TIST		1189	JE, ES, SHARICE, CLARK HAZEL	1/	20
11	"	"	TIST To TGB		1190	JE, GM, CT, CLARK HAZEL, CLARK HAZEL	1/	37
15	"	"	TGB To PBI		1191	JE, GM, CT, CLARK HAZEL	1/	20
17	"	"	PBI To TGB		1192	JE	1/	24
18	"	"	TGB To MDW		1193	GM, ES, SHANNON DEARY, SHANNON DEARY, SHANNON DEARY	1/	16
18	"	"	MDW To SAF		1194	GM, ES, JE, SHANNON DEARY, SHANNON DEARY	1/	25
20	"	"	SAF To LAX		1195	JE, GM, CT, SHANNON DEARY, SHANNON DEARY	1/	17
20	"	"	LAX To TGB		1196	GM, ES, SHANNON DEARY, SHANNON DEARY	1/	45
24	"	"	TGB To PBI		1197	JE, SHANNON DEARY, SHANNON DEARY	1/	22
28	"	"	PBI To TGB		1198	JE, SHANNON DEARY, SHANNON DEARY	1/	25
12	"	"	TGB To TIST		1199	JE, GM, CT, CLARK HAZEL, CLARK HAZEL	1/	30
15	"	"	TIST To JFK		1200	JE, GM, CT, CLARK HAZEL, CLARK HAZEL	1/	43
18	"	"	JFK To PBI		1201	JE, GM, CT, CLARK HAZEL, CLARK HAZEL	1/	20
21	"	"	PBI To TGB		1202	JE, GM, CT, CLARK HAZEL, CLARK HAZEL	1/	25
23	"	"	TGB To BED		1203	JE	1/	7
23	"	"	BED To TGB		1204	JE, HENRY ROSOVSKY, HENRY ROSOVSKY	1/	12
26	"	"	TGB To PBI		1205	JE, GM, CLARK HAZEL, CLARK HAZEL	1/	26
TOTAL AT BOTTOM OF PAGE			REPORT TO	INSURANCE	CONFIDENTIAL			

I certify that the statements made by me on this form are true.

Signature: *David Redman*

Print Name: David Redman

Paid Total	15	43	7
Amount Forward	6054	7206	9
Total to Date	6054	7206	9



CONFIDENTIAL DR\_000020

Date 1910	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To				As Required	
5 JUL	G1159B	N9083E	PBI	OXC		126 JC	1/1	25	
5	"	"	OXC	TGB		127 JC	1/1	4	
10	"	"	TGB	PBI		128 JC, SANCHEZ BIDDLE, 2 REMARKS	1/1	23	
12	C150	49563	JVW	JVW		C150 CHECK OUT DAN-CEI	2/2	6	
12	"	N778ME	JVW	JVW		1 JONATHAN WARD - PREVIOUSLY, CIRCULARS, EMERGENCY, STAFF, MINOR, CIRCULARS, 3/4/2018	2/2	14	
13	"	"	"	"		2 AIRCRAFT, TRAFFIC, PATROL, CIRCULARS, 3/4/2018	3/3	11	
13	"	"	"	"		3 MCB, STAFF, WARD, 3/4/2018, 3/4/2018	2/2	5	
16	"	"	"	"		4 JONATHAN WARD, VJ, STAFF, WARD, 3/4/2018	4/4	10	
16	"	"	"	"		5 JONATHAN WARD, CIRCULARS, 3/4/2018, 3/4/2018	3/3	9	
17	"	"	"	"		6 JONATHAN WARD, CIRCULARS, 3/4/2018, 3/4/2018	2/2	11	
17	"	N45563	JVY	BQM		7 VJ, STAFF, WARD, 3/4/2018, 3/4/2018	2/2	8	
17	"	"	BQM	JVY		8 MCB, CIRCULARS, 3/4/2018, 3/4/2018	4/4	8	
17	"	N778ME	JVY	JVY		9 JONATHAN WARD, CIRCULARS, 3/4/2018, 3/4/2018	5/5	12	
17	"	"	"	"		10 JONATHAN WARD, CIRCULARS, 3/4/2018, 3/4/2018	4/4	8	
18	"	"	JVY (Left)	IMS		11 JONATHAN WARD, CIRCULARS, 3/4/2018, 3/4/2018	1/1	14	
18	"	"	IMS	JVY		12 JONATHAN WARD, CIRCULARS, 3/4/2018, 3/4/2018	1/1	4	
28	G1159B	SIMULATED	IRW	IRW		13 JONATHAN WARD, CIRCULARS, 3/4/2018, 3/4/2018		21	
29	"	"	HUB	HOU		14 JONATHAN WARD, CIRCULARS, 3/4/2018, 3/4/2018		18	
30	"	"	CYS	COS		15 JONATHAN WARD, CIRCULARS, 3/4/2018, 3/4/2018		21	
I certify that the statements made by me on this form are true.							43/43	232	
Page Total							6079	7250	6
Amount Forward							6122	7273	8
Total to Date									

F. N. N. D. M. A. I. .

Farid Pordel

GIUFFRE007075  
CONFIDENTIAL

[illegible]

Plot's Signature: David Plotkin

GIUFFRE007076  
CONFIDENTIAL



CONFIDENTIAL DR\_000023

Date 19 <u>98</u> CLC	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...				
			From	To					APR/ALC	GLIDE			
6	G-1159B	N908JC	TEB	BED		116	JG, RHONDA SIKENGE	1/1	6				
6	"	"	BED	TEB		117	JG, RHONDA SIKENGE		7				
9	"	"	TEB	OCA		118	JG, ET, ADAM PEREZ-LAIG	1/1	7				
9	"	"	OCA	PBI		119	JG, GM, ET, AP		20				
12	"	"	PBI	TEB		120	JG, GM, ET, AP	1/1	23				
15	"	"	TEB	PBI		121	JG, SOPHIE BRIDLE		21				
19	"	"	PBI	TEB		122	JG, SOPHIE BRIDLE	1/1	22				
21	"	"	TEB	BED		123	JG	1/1	6				
21	"	"	BED	TEB		124	JG, ALAN PERSHONWITZ	1/1	8				
23	"	"	TEB	PBI		125	JG, GM, ET, GWYNETH BEAL	1/1	23				
7	"	"	PBI	TEB		126	NO PASSENGERS	1/1	23				
7	"	"	TEB	PBI		127	JG		23				
10	"	"	PBI	TEB		128	JG	1/1	25				
14	"	"	TEB	TEST		129	JG, ET, CLARE HAZEL FRANCIS	1/1	32				
15	"	"	TEST	PBI		130	JG, GM, CLARE HAZEL ET, FRANCIS	1/1	24				
16	"	"	PBI	CMIH		131	JG, GM, ET, CLARE HAZEL FRANCIS	1/1	20				
16	"	"	CMIH	TEB		132	JG, GM, ET, FRANCIS	1/1	11				
20	"	"	TEB	TEST		133	JG, GM, ET, AP	1/1	33				
1	C421B	N408GM	PBI	TEST				3/3	10				
I certify that the statements made by me on this form are true.										Page Total	16/12	34	4
										Amount Forward	5146	7328	4
										Total to Date	5162	7362	8
											5162	7362	8
											3	3	3

Pilot's Signature [Signature]



CONFIDENTIAL DR\_000024

Date 1953 New	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Algebra	Algebra
26	G-1154B	N909JE	TIST	PBI		184	TC, GM	1	25	141-1008
29	"	"	PBI	TCB		185	TC, GM, MANDATORY, LYN, SCHEDULE, P2		25	
29	"	"	TCB	PBI		186	TC, GM, ALEXANDER	1	22	
30	"	"	PBI	TIST		187	TC, GM, SCHEDULE, BIDDLE	1	23	
30	"	"	TIST	SAV		188	OR 5 2 INSPECTED	1	30	
31	"	"	SAV	PBI		189	OR 5 2 COMPLETED		9	
31	"	"	PBI	TIST		190	REPOSITION	1	21	
1	"	"	TIST	PBI		191	TC, GM	1	25	
4	"	"	PBI	TCB		192	TC, GM, MANDATORY, MANDATORY	1	22	
9	"	"	TCB	ABY		193	TC, GM, ALEXANDER	1	25	
10	"	"	ABY	SDY		194	TC, GM, ALEXANDER	1	30	
12	"	"	SDY	VNY		195	TC, GM, ALEXANDER	1	16	
15	"	"	VNY	PBI		196	TC, GM, JEAN LUKS		42	
19	"	"	PBI	TIST		197	TC, GM, GT	1	21	
24	"	"	TIST	TCB		198	TC, GM, GT, UG, CIL, MANDATORY	1	36	
29	"	"	TCB	PBI		199	TC, GM, GT, UG, CIL, MANDATORY, A, B	1	23	
30	"	"	PBI	PMF		200	SEE MANEUVER, MANDATORY, A, B			
30	G-1154B	N909JE	PMF	TCB		201	TC, GM, GT, UG, CIL, MANDATORY, A, B	1	25	12
2	206B3	SAF4	PMF	PMF		202	A, E			8
Total									14/8	420
Amount Forward									5834	33
Total to Date									5832	33

I certify that the statements made by me on this form are true.

Pilot's Signature: Daniel Reda

CONFIDENTIAL DR\_000025

Date 10/1/83	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Proposed	Actual
3	206B3	59PH	PMP	PMP		3	A-E			
4	"	"	"	"		4	A-E - Full control			
5	G-1154B	N908JE	TEB	PBI		5	A-E - Full control	1	2	
6	206B3	59PH	PMP	PMP		6	A-E - Advanced maneuvers			
7	206B	59PH	PMP-PBI	PMP		7	A-E / start of C & D			
8	"	"	"	"		8	A-E			
9	G-1154B	N908JE	PBI	TEB		9	A-E, MELINDA LYNCH		2	1
10	"	"	TEB	TEB		10	A-E, MELINDA LYNCH		3	3
11	"	"	TEB	TEB		11	A-E, MELINDA LYNCH		3	3
12	"	"	TEB	TEB		12	A-E, MELINDA LYNCH		3	3
13	206B3	59PH	PMP-LCL-PH	PMP		13	A-E / start of C	1	2	6
14	206B3	59PH	PMP-LCL-PH	PMP		14	A-E / start of C	1	2	6
15	G-1154B	N908JE	PBI	SAF		15	A-E, MELINDA LYNCH	1	1	1
16	G-1154B	N908JE	PBI	SAF		16	A-E, MELINDA LYNCH	1	1	1
17	G-1154B	N908JE	PBI	SAF		17	A-E, MELINDA LYNCH	1	1	1
18	G-1154B	N908JE	PBI	SAF		18	A-E, MELINDA LYNCH	1	1	1
19	G-1154B	N908JE	PBI	SAF		19	A-E, MELINDA LYNCH	1	1	1
20	G-1154B	N908JE	PBI	SAF		20	A-E, MELINDA LYNCH	1	1	1
21	G-1154B	N908JE	PBI	SAF		21	A-E, MELINDA LYNCH	1	1	1
22	G-1154B	N908JE	PBI	SAF		22	A-E, MELINDA LYNCH	1	1	1
23	G-1154B	N908JE	PBI	SAF		23	A-E, MELINDA LYNCH	1	1	1
24	G-1154B	N908JE	PBI	SAF		24	A-E, MELINDA LYNCH	1	1	1
25	G-1154B	N908JE	PBI	SAF		25	A-E, MELINDA LYNCH	1	1	1
26	G-1154B	N908JE	PBI	SAF		26	A-E, MELINDA LYNCH	1	1	1
27	G-1154B	N908JE	PBI	SAF		27	A-E, MELINDA LYNCH	1	1	1
28	G-1154B	N908JE	PBI	SAF		28	A-E, MELINDA LYNCH	1	1	1
29	G-1154B	N908JE	PBI	SAF		29	A-E, MELINDA LYNCH	1	1	1
30	G-1154B	N908JE	PBI	SAF		30	A-E, MELINDA LYNCH	1	1	1
31	G-1154B	N908JE	PBI	SAF		31	A-E, MELINDA LYNCH	1	1	1
32	G-1154B	N908JE	PBI	SAF		32	A-E, MELINDA LYNCH	1	1	1
33	G-1154B	N908JE	PBI	SAF		33	A-E, MELINDA LYNCH	1	1	1
34	G-1154B	N908JE	PBI	SAF		34	A-E, MELINDA LYNCH	1	1	1
35	G-1154B	N908JE	PBI	SAF		35	A-E, MELINDA LYNCH	1	1	1
36	G-1154B	N908JE	PBI	SAF		36	A-E, MELINDA LYNCH	1	1	1
37	G-1154B	N908JE	PBI	SAF		37	A-E, MELINDA LYNCH	1	1	1
38	G-1154B	N908JE	PBI	SAF		38	A-E, MELINDA LYNCH	1	1	1
39	G-1154B	N908JE	PBI	SAF		39	A-E, MELINDA LYNCH	1	1	1
40	G-1154B	N908JE	PBI	SAF		40	A-E, MELINDA LYNCH	1	1	1
41	G-1154B	N908JE	PBI	SAF		41	A-E, MELINDA LYNCH	1	1	1
42	G-1154B	N908JE	PBI	SAF		42	A-E, MELINDA LYNCH	1	1	1
43	G-1154B	N908JE	PBI	SAF		43	A-E, MELINDA LYNCH	1	1	1
44	G-1154B	N908JE	PBI	SAF		44	A-E, MELINDA LYNCH	1	1	1
45	G-1154B	N908JE	PBI	SAF		45	A-E, MELINDA LYNCH	1	1	1
46	G-1154B	N908JE	PBI	SAF		46	A-E, MELINDA LYNCH	1	1	1
47	G-1154B	N908JE	PBI	SAF		47	A-E, MELINDA LYNCH	1	1	1
48	G-1154B	N908JE	PBI	SAF		48	A-E, MELINDA LYNCH	1	1	1
49	G-1154B	N908JE	PBI	SAF		49	A-E, MELINDA LYNCH	1	1	1
50	G-1154B	N908JE	PBI	SAF		50	A-E, MELINDA LYNCH	1	1	1
51	G-1154B	N908JE	PBI	SAF		51	A-E, MELINDA LYNCH	1	1	1
52	G-1154B	N908JE	PBI	SAF		52	A-E, MELINDA LYNCH	1	1	1
53	G-1154B	N908JE	PBI	SAF		53	A-E, MELINDA LYNCH	1	1	1
54	G-1154B	N908JE	PBI	SAF		54	A-E, MELINDA LYNCH	1	1	1
55	G-1154B	N908JE	PBI	SAF		55	A-E, MELINDA LYNCH	1	1	1
56	G-1154B	N908JE	PBI	SAF		56	A-E, MELINDA LYNCH	1	1	1
57	G-1154B	N908JE	PBI	SAF		57	A-E, MELINDA LYNCH	1	1	1
58	G-1154B	N908JE	PBI	SAF		58	A-E, MELINDA LYNCH	1	1	1
59	G-1154B	N908JE	PBI	SAF		59	A-E, MELINDA LYNCH	1	1	1
60	G-1154B	N908JE	PBI	SAF		60	A-E, MELINDA LYNCH	1	1	1
61	G-1154B	N908JE	PBI	SAF		61	A-E, MELINDA LYNCH	1	1	1
62	G-1154B	N908JE	PBI	SAF		62	A-E, MELINDA LYNCH	1	1	1
63	G-1154B	N908JE	PBI	SAF		63	A-E, MELINDA LYNCH	1	1	1
64	G-1154B	N908JE	PBI	SAF		64	A-E, MELINDA LYNCH	1	1	1
65	G-1154B	N908JE	PBI	SAF		65	A-E, MELINDA LYNCH	1	1	1
66	G-1154B	N908JE	PBI	SAF		66	A-E, MELINDA LYNCH	1	1	1
67	G-1154B	N908JE	PBI	SAF		67	A-E, MELINDA LYNCH	1	1	1
68	G-1154B	N908JE	PBI	SAF		68	A-E, MELINDA LYNCH	1	1	1
69	G-1154B	N908JE	PBI	SAF		69	A-E, MELINDA LYNCH	1	1	1
70	G-1154B	N908JE	PBI	SAF		70	A-E, MELINDA LYNCH	1	1	1
71	G-1154B	N908JE	PBI	SAF		71	A-E, MELINDA LYNCH	1	1	1
72	G-1154B	N908JE	PBI	SAF		72	A-E, MELINDA LYNCH	1	1	1
73	G-1154B	N908JE	PBI	SAF		73	A-E, MELINDA LYNCH	1	1	1
74	G-1154B	N908JE	PBI	SAF		74	A-E, MELINDA LYNCH	1	1	1
75	G-1154B	N908JE	PBI	SAF		75	A-E, MELINDA LYNCH	1	1	1
76	G-1154B	N908JE	PBI	SAF		76	A-E, MELINDA LYNCH	1	1	1
77	G-1154B	N908JE	PBI	SAF		77	A-E, MELINDA LYNCH	1	1	1
78	G-1154B	N908JE	PBI	SAF		78	A-E, MELINDA LYNCH	1	1	1
79	G-1154B	N908JE	PBI	SAF		79	A-E, MELINDA LYNCH	1	1	1
80	G-1154B	N908JE	PBI	SAF		80	A-E, MELINDA LYNCH	1	1	1
81	G-1154B	N908JE	PBI	SAF		81	A-E, MELINDA LYNCH	1	1	1
82	G-1154B	N908JE	PBI	SAF		82	A-E, MELINDA LYNCH	1	1	1
83	G-1154B	N908JE	PBI	SAF		83	A-E, MELINDA LYNCH	1	1	1
84	G-1154B	N908JE	PBI	SAF		84	A-E, MELINDA LYNCH	1	1	1
85	G-1154B	N908JE	PBI	SAF		85	A-E, MELINDA LYNCH	1	1	1
86	G-1154B	N908JE	PBI	SAF		86	A-E, MELINDA LYNCH	1	1	1
87	G-1154B	N908JE	PBI	SAF		87	A-E, MELINDA LYNCH	1	1	1
88	G-1154B	N908JE	PBI	SAF		88	A-E, MELINDA LYNCH	1	1	1
89	G-1154B	N908JE	PBI	SAF		89	A-E, MELINDA LYNCH	1	1	1
90	G-1154B	N908JE	PBI	SAF		90	A-E, MELINDA LYNCH	1	1	1
91	G-1154B	N908JE	PBI	SAF		91	A-E, MELINDA LYNCH	1	1	1
92	G-1154B	N908JE	PBI	SAF		92	A-E, MELINDA LYNCH	1	1	1
93	G-1154B	N908JE	PBI	SAF		93	A-E, MELINDA LYNCH	1	1	1
94	G-1154B	N908JE	PBI	SAF		94	A-E, MELINDA LYNCH	1	1	1
95	G-1154B	N908JE	PBI	SAF		95	A-E, MELINDA LYNCH	1	1	1
96	G-1154B	N908JE	PBI	SAF		96	A-E, MELINDA LYNCH	1	1	1
97	G-1154B	N908JE	PBI	SAF		97	A-E, MELINDA LYNCH	1	1	1
98	G-1154B	N908JE	PBI	SAF		98	A-E, MELINDA LYNCH	1	1	1
99	G-1154B	N908JE	PBI	SAF		99	A-E, MELINDA LYNCH	1	1	1
100	G-1154B	N908JE	PBI	SAF		100	A-E, MELINDA LYNCH	1	1	1

GIUFFRE007080  
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David Bodin

GIUFFRE007081  
CONFIDENTIAL



GIUFFRE007082  
CONFIDENTIAL

CONFIDENTIAL DR\_000029

Date, 19 MM	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Misc Flown	Flight No.	Remarks, Procedures, Mapnotations, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ABOLAND	GLINE
17	G1159B	N908JTE	TEB	SAF		123	10-15, ROR	1	3	
17	"	"	SAF	ABE		123	10-15, ROR		2	
18	"	"	ABE	DAL		123	10-15, ROR	1	1	
18	"	"	DAL	ABE		123	10-15, ROR		2	
19	REGGIB	N500JP	PBI-LNA	PBI			10-15, ROR			
20	"	"	PMP	PMP			10-15, ROR			
21	"	"	PMP	DAB			10-15, ROR			
21	"	"	DAB	PBI			10-15, ROR			
21	"	"	PBI	PMP			10-15, ROR			
23	G1159B	N908JTE	PBI	TEB		123	10-15, ROR	1	2	
27	FLIGHT TIMES REPORTED						TO INSURANCE COMPANY			
27	G1159B	N908JTE	TEB	PBI		123	10-15, ROR	1	2	
29	"	"	PBI	TEB		123	10-15, ROR	1	2	
30	"	"	TEB	PBI		123	10-15, ROR	1	2	
31	"	"	PBI	SAF		123	10-15, ROR	1	2	
31	"	"	SAF	PBI		123	10-15, ROR	1	2	
7	"	"	PBI	TEB		123	10-15, ROR	1	2	
9	"	"	TEB	PBI		123	10-15, ROR	1	2	
15	"	"	PBI	TEB		123	10-15, ROR	1	2	

I certify that the statements made by me on this form are true.

Pilot's Signature: *Carol Rader*

Page Total: 9/7 321

Amount Forward: 6267 75094 33 595

Griffin



GIUFFRE007085  
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CONFIDENTIAL DR\_000032

Date 1994	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ACR	HELICOPTER
5	G-1159B	N9088JC	SAN	SAF	22	1276	JE, SHANNON HEALY	1	1	6
7	G1	"	SAF	TEB		1277	JE, CLARE, VICTORIA HAZEL, ADAM	1	3	5
8	"	"	TEB	CMH		1278	JE, CLARE HAZEL	1	1	4
8	"	"	CMH	TEB		1279	JE, CLARE, MARSHALL, MALE		1	3
9	"	"	TEB	PBI		1280	JE, CLARE		2	5
13	"	"	PBI	TEB		1281	JE, G.M. PAUL, EPSTEIN, MANDY KALAN, ELSON, CLARE HAZEL	1	2	4
17	"	"	TEB	PBI		1282	JE, G.M. PAUL, EPSTEIN, EST, CLARE HAZEL	2/2	2	4
19	C-172	N2388L	LNA	LNA		1283	ALC, INT, SAT, TECHNICAL, CLARE HAZEL, EST	1	2	5
20	G-1159B	N9088JC	PBI	TEB		1284	JE, CLARE, EST	1	2	6
22	"	"	TEB	PBI			JE, CLARE, EST		1	1
23	C-172	N2388L	LNA	FXC			ED AMARO CFI RENEWAL	1	1	1
23	"	"	FXC	LNA			ED AMARO CFI RENEWAL	1	1	1
25	G-1159B	N9088JC	PBI	TEB		1285	JE, G.M. PAUL, SHERRY HARRISON	1	2	5
26	"	"	TEB	TEB		1286	JE, G.M. PAUL, SHERRY HARRISON	1	3	8
27	"	"	TEB	TEB		1287	JE, SHERRY LEWIS	1	3	5
9	"	"	TEB	PBI		1288	JE, SHERRY LEWIS	1	2	6
11	"	"	PBI	SAF		1289	JE	1	3	7
12	"	"	SAF	TEB		1290	JE, G.M. PAUL, SOPHIE BIDDLE	1	3	5
14	"	"	TEB	BED		1291	JE, G.M. PAUL, AMAR HARRISON	1	1	1
Total									16/14	428
Amount Forward									6354	76180
Total to Date									6270	76608

Pilot's Signature: David Rodriguez

I certify that the statements made by me on this form are true.

GIUFFRE007087  
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GIUFFRE007089  
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Date 2000 Feb	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					PERM. NO.	CLASS
23	206L3	N72PA	PMP-FXE-PMP				IFR/L7,8, +10 ONLY LANDING	1	30054701211	H2616
24	206L3	N72PA	PMP-FXE-PMP				IFR/L6,9, +10	1	30054701211	H2616
25	206L3	N72PA	PMP-FXE-PMP				IFR/L7 + 9	1	30054701211	H2616
26	206L3	N72PA	PMP-LNA-SUM-PMP					2	30054701211	H2616
27	"	"	PMP	FME				1		
28	"	"	FME	URB			IFR/L6,7,9, +10	1		
29	"	"	URB	FME-PMP			IFR/L6,7,9, +10	1		
30	"	"	PMP-FXE-PMP					1		
31	"	"	PMP-FUE-LNA-PMP				IFR/L1,3,4,5,9, +10	1		
32	"	"	PMP-FUE-LNA-PMP				IFR/L2,6,7,9, +10	1		
33	"	"	PMP	PMP			IFR/L4,6,8,16, +17	1		
34	"	"	PMP	LNA			IFR/L6,8, +12 (NOLA)	1		
35	"	"	PMP	PMP			IFR REVIEW/L9 +10	1		
36	"	"	PMP	PMP			IFR REVIEW/L9 +10	1		
37	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
38	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
39	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
40	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
41	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
42	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
43	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
44	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
45	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
46	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
47	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
48	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
49	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
50	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
51	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
52	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
53	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
54	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
55	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
56	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
57	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
58	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
59	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
60	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
61	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
62	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
63	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
64	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
65	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
66	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
67	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
68	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
69	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
70	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
71	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
72	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
73	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
74	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
75	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
76	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
77	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
78	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
79	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
80	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
81	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
82	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
83	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
84	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
85	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
86	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
87	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
88	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
89	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
90	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
91	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
92	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
93	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
94	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
95	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
96	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
97	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
98	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
99	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		
100	"	"	PMP-LNA-PMP				IFR REVIEW/L9 +10	1		

CONFIDENTIAL DR\_000036

CONFIDENTIAL DR\_000037

Date 2002 MM	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To				Category	Weight
8	G-1154B	N90852	TST	TB		JG, GM, ET, AP, 1 FEMALE 1341	1	3	8
12	"	"	TB	PBI		1342	1	2	4
15	"	"	PBI	TB		1343	1	2	4
16	"	"	TB	TST		1344	1	3	6
21	"	"	TST	TB		1345	1	4	0
30	"	"	TB	MDW		1346	1	1	9
31	"	"	MDW	TB		1347	1	1	7
4	"	"	TB	PBI		1348	1	2	4
9	"	"	PBI	TB		1349	1	2	4
12	"	"	TB	SAF		1350	1	3	9
14	"	"	SAF	VNY		1351	1	1	7
14	"	"	VNY	SFO		1352	1	1	2
14	"	"	SFO	LAS		1353	1	1	2
15	"	"	LAS	PAX		1354	1	1	0
17	"	"	PAX	PBI		1355	1	3	9
18	"	"	PBI	TB		1356	1	2	6
25	"	"	TB	TST		1357	1	3	7
25	"	"	TST	TB		1358	1	3	7
25	"	"	TB	PBI		1359	1	2	4

Page Total

Amount Forward

33112.6

CONFIDENTIAL DR\_000038

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRPLAN	GLIDER
30 JUN	G-1154B	N908JC	PBI	TST		135	REPOSITION	1/0	2	8
30 JUN	"	"	TST	PBI		135	JG/GM, CT, AP, SORTIE BIDDLE	1/	2	5
1 JUL	"	"	PBI	TEB		138	JG/GM, CT, AP, SORTIE BIDDLE	1/	2	5
5	"	"	TEB	LFB		139	JG/GM	1/	6	9
6	"	"	LFB	LFB		139	JG/GM	1/	2	0
9	"	"	LFB	GMMX		139	JG/GM	1/	2	9
11	"	"	GMMX	GMMX		139	JG/GM	1/	9	
11	"	"	GMMX	LEBB		139	JG/GM	1/	1	9
11	"	"	LEBB	EGGW		139	JG/GM	1/	1	7
12	"	"	EGGW	EGAA		139	JG/GM	1/	1	0
12	"	"	EGAA	BGR		139	JG/GM	1/	6	4
12	"	"	BGR	TEB		139	JG/GM	1/	1	1
14	"	"	TEB	PBI		139	JG/GM, CT, AP, SORTIE, JAPANESE	1/	2	5
19	"	"	PBI	TEB		139	JG/GM, CT, AP, SORTIE, JAPANESE	1/	2	5
19	"	"	TEB	SAF		139	JG/GM, CT, AP, SORTIE, JAPANESE	1/	4	1
20	"	"	SAF	JFK		139	JG/GM, CT, AP, SORTIE, JAPANESE	1/	3	9
20	"	"	JFK	JFK		139	JG/GM, CT, AP, SORTIE, JAPANESE	1/	4	0
20	"	"	JFK	JFK		139	JG/GM, CT, AP, SORTIE, JAPANESE	1/	4	1
21	"	"	JFK	JFK		139	JG/GM, CT, AP, SORTIE, JAPANESE	1/	3	5
21	"	"	JFK	JFK		139	JG/GM, CT, AP, SORTIE, JAPANESE	1/	3	5
Total									12	57
Amount Forward									7818	7
Page Total									3	112

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Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Engagements	Number of Landings	Aircraft Category...	
			From	To					ARELAND	HELICAP
24 AUG	G-1159B	N908JE	SAF	VNY		1376	JE, KELLY SPAMM	✓	17	
26	"	"	VNY	TEB		1380	JE, GM, AP	✓	49	
31	"	"	TEB	PBI		1381	JE		22	
SEP	"	"	PBI	TEB		1382	JE	✓	25	
9	"	"	TEB	PBI		1383	JE, GM, ET, AP		23	
10	"	"	PBI	TIST		1384	JE, GM, ET, AP, CHERI KRAPE	✓	25	
12	"	"	TIST	TEB		1385	JE, GM, ET, AP, CHERI KRAPE	✓	39	
21	"	"	TEB	SAF		1386	JE, GM, AP, JOE PAGANO, 1 FEMALE		42	
25	"	"	SAF	VNY		1387	JE, KELLY SPAMM	✓	18	
26	"	"	VNY	TEB		1388	JE, TIFFANY GRAMZA	✓	48	
29	"	"	TEB	TIST		1389	JE, PETER MARINO, 1 PERSON	✓	36	
30	"	"	TIST	PBI		1390	JE, PETER MARINO, 1 FEMALE	✓	26	
31	"	"	PBI	TEB		1391	JE, GM, ET, 1 FEMALE	✓	25	
5	"	"	TEB	PBI		1392	JE, SHARLEY LEWIS		24	
10	"	"	PBI	TEB		1393	JE, GM, ET	✓	25	
13	"	"	TEB	LGA		1394	JE, RECEPTION FOR PARS		5	
13	"	"	LGA	LEPB		1395	JE, VOR HOLDING	✓	71	
15	"	"	-FAB	EGBB		1396	JE, SHARLEY LEWIS	✓	13	
17	"	"	EGBB	BGR		1397	JE, SHARLEY LEWIS	✓	64	
I certify that the assignments made by me on this form are true.								13	10	597
Pilot's Signature								6318	7875	9
								6331	7935	6
								6015	33	112
									33	112

CONFIDENTIAL DR\_000039



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CONFIDENTIAL DR\_000041

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miss Form No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To				Airplane	Helicopter
19 Nov 2000	G-1159B	N 908JE	BED	TGB		1418 JG, SHELLEY LEWIS		1	1
22	"	"	TGB	DCA		1419 JG, AP, SHELLEY LEWIS	1/1	1	0
22	"	"	DCA	PBI		1420 JG, AP, SHELLEY LEWIS	1/1	2	2
28	"	"	PBI	TJST		1421 JG, GM		2	4
30	"	"	TJST	PBI		1422 JG, GM	1/1	2	7
Dec 1	"	"	PBI	DFW		1423 JG, GM	1/1	2	7
1	"	"	DFW	ABQ		1424 JG, GM, RECARO LEGORRETTA	1/1	1	8
2	"	"	ABQ	SAC		1425 REPOSITION	1/1	5	
2	"	"	SAC	TGB		1426 JG, GM		3	5
5	"	"	TGB	LFPB		1427 JG, GM, ET, KELLY SPANNA	1/1	6	8
6	"	"	LFPB	EGGW		1428 JG, GM, ET, KELLY SPANNA		1	0
7	"	"	EGGW	EGYM		1429 JG, GM, KELLY SPANNA, TOM ARISTIDE, T. KIMBLE, CAROLINA ABLE (GOLF PCH)		5	
7	"	"	EGYM	EGSH		1430 REPOSITION (MANCHESTER, ENGLAND)		4	
9	"	"	EGSH	CYQX		1431 JG, GM, ET, KELLY SPANNA		5	0
9	"	"	CYQX	PBI		1432 JG, GM, ET, KELLY SPANNA		4	7
11	"	"	PBI	TGB		1433 JG, GM, ET, VERBAZEA	1/1	2	6
14	"	"	TGB	TJST		1434 JG, GM, AP, VERBAZEA	1/1	3	5
14	"	"	TJST	PBI		1435 REPOSITION FOR OPS 2 + TERS		2	4
30 Nov 2000	"	"	PBI	PBI		1436 TEAS CERTIFICATION	1/1	7	
Page Total							9/16	455	
Amount Forward							6342	79919	33 112 6
							6024		
							1251		

I certify that the statements made by me on this form are true.

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CONFIDENTIAL DR\_000042

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Altcraft Category...	
			From	To					Altcraft	Category
16 JAN 2001	G-1159B	N908JC	PBJ	LCQ		1487	JG, GM, ET	1/1	Altcraft	HELICOPTER
16	"	"	LCQ	TEB		1488	JG, GM, ET	1/1	2	1
17	"	"	TEB	PBJ		1489	JG, STELLER LEWIS		2	4
22	"	"	PBJ	TEB		1490	JG, GM, ET, AP	1/1	2	5
23	"	"	TEB	LFB		1491	JG, STELLER LEWIS	1/1	6	7
25	"	"	LFB	CPQX		1492	JG, STELLER LEWIS	1/1	5	9
25	"	"	CPQX	TEB		1493	JG, STELLER LEWIS		2	7
26	"	"	TEB	PBJ		1494	JG, GM, ET, VIRGINIA ROBERTS		2	4
18	C172	N1446V	PBJ	PBJ-LNA			C172 VOUT PATE SORENSON	2/2		
18	"	"	LNA	LCQ			ATZ CLONING NS05LS	1/1	2	4
19	"	"	LCQ	MCO			JANET HANNAH - INSTRUMENT COMPETENCY CHECK - CAFE CATEGORY		2	0
19	"	"	MCO	LNA					1	9
20	G1159B	N908JC	PBJ	TIST		1495	JG, GM, ET, VIRGINIA ROBERTS	1/1	2	4
30	"	"	TIST	PBJ		1496	JG, GM, ET, VIRGINIA ROBERTS	1/1	2	6
3	C-421B	N908GM	SAP	DFW			JANET HANNAH - FIVE 6131(G) JANSSEN/ATZ CLONING FL270		3	0
17	B-727-200	SMULPDB	MGM	MGM			STATUS, STENO KID, FIVE 6131(G) JANSSEN/ATZ CLONING FL270	1/1	2	5
18	"	"	"	"			STATUS, STENO KID, FIVE 6131(G) JANSSEN/ATZ CLONING FL270		3	0
19	"	"	DFW	MGM			STATUS, STENO KID, FIVE 6131(G) JANSSEN/ATZ CLONING FL270		2	2
20	"	"	MGM	MGM			STATUS, STENO KID, FIVE 6131(G) JANSSEN/ATZ CLONING FL270		3	5

I certify that the statements made by me on this form are true.

Pilot's Signature: David Redden

Page Total: 6351  
Amount Forward: 6351  
Total to Date: 8037 4 3 3 112 6



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CONFIDENTIAL DR\_000044

Date Mo Day	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ADIRLDM	GLIOLP
2001 15	G-1154B	N909JG	TSP	LCA		1472	TE, GM, AP, ALGAFD, WILLAGES, RGR	1/1	2	6
15	"	"	LCA	PBI		1473	TE, GM, AP, ALGAFD, WILLAGES, RGR	1/1	9	
16	"	"	PBI	LAJA		1474	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	7	
16	"	"	MFA	TST		1475	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	2	2
19	"	"	TST	LCA		1476	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	3	8
22	"	"	LCA	PBI		1477	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	2	4
23	G-1154B	N908GM	PBI	OPF		1478	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	6	
23	"	"	OPF	FL		1479	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	4	
23	"	"	FL	PBI		1480	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	6	
24	"	"	PBI	ISM		1481	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	1	0
24	"	"	ISM	PBI		1482	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	1	1
27	G-1154B	N909JG	PBI	TGB		1483	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	2	5
29	"	"	TGB	SAF		1484	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	1	1
31	"	"	SAF	PBI		1485	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	3	3
Apr	"	"	PBI	LCA		1486	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	1	0
1	"	"	LCA	TGB		1487	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	2	1
3	"	"	TGB	GAF		1488	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	9	
3	"	"	GAF	TGB		1489	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	8	
4	"	"	TGB	OPF		1490	TE, GM, AP, AW, BK, CHG, BE, LYNDEN, RGR	1/1	8	

Page Total	15/12	51	9
Amount Forward	8364	4	33
Total to Date	6384	3	33

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CONFIDENTIAL DR\_000047

Date 4-2-2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To				Aircraft Name	Category
4-2-2003	B727-31	N508LS	LCO	PBI		REPOSITION SOURCE WALLER 1504 0500Z, BP, BAWU KUEK KOTLU	1	10	4-2-2003
5-1-2003	G-1189B	N909JC	TGB	PBI	1504	1504 0500Z, BP, BAWU KUEK KOTLU	1	2	6
3	"	"	PBI	TST	1510	1510 0500Z, BP, BAWU KUEK KOTLU	1	2	4
5	"	"	TST	TGB	1511	1511 0500Z, BP, BAWU KUEK KOTLU	1	3	8
8	"	"	TGB	CYUL	1512	1512 0500Z, BP, BAWU KUEK KOTLU	1	1	1
12	"	"	CYUL	TGB	1513	1513 0500Z, BP, BAWU KUEK KOTLU	1	1	1
12	"	"	TGB	PBI	1514	1514 0500Z, BP, BAWU KUEK KOTLU	1	2	3
13	"	"	PBI	TGB	1515	1515 0500Z, BP, BAWU KUEK KOTLU	1	2	4
15	"	"	TGB	PBI	1516	1516 0500Z, BP, BAWU KUEK KOTLU	1	2	3
18	"	"	PBI	TGB	1517	1517 0500Z, BP, BAWU KUEK KOTLU	1	2	5
22	"	"	TGB	LFO	1518	1518 0500Z, BP, BAWU KUEK KOTLU	1	7	0
23	"	"	LFO	LPMN	1519	1519 0500Z, BP, BAWU KUEK KOTLU	1	1	2
25	"	"	LPMN	LIML	1520	1520 0500Z, BP, BAWU KUEK KOTLU	1	1	7
26	"	"	LPMN	LFPB	1521	1521 0500Z, BP, BAWU KUEK KOTLU	1	1	4
28	"	"	LFPB	LPAZ	1522	1522 0500Z, BP, BAWU KUEK KOTLU	1	3	9
28	"	"	LPAZ	TST	1523	1523 0500Z, BP, BAWU KUEK KOTLU	1	6	0
24	"	"	TST	PBI	1524	1524 0500Z, BP, BAWU KUEK KOTLU	1	2	5
8	"	"	PBI	TGB	1525	1525 0500Z, BP, BAWU KUEK KOTLU	1	2	7
11	"	"	TGB	CPS	1526	1526 0500Z, BP, BAWU KUEK KOTLU	1	2	3

I certify that the statements made by me on this form are true.

Pavel Podgorn

Pilot's Signature

Page Total	16/14	49/2	
Amount Forward	6411	8233	9
Total to Date	6430	8283	1



CONFIDENTIAL DR\_000048

Date	Altcraft Make and Model	Altcraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Encounters	Number of Landings	Altcraft Category...	
			From	To					Altcraft	Category
15-11-57	C-1157B	N908JC	CPS	SAF		1521	REPOSTED - MOTOR STATIC LEAK	1/1	Altcraft	Guard
16	"	"	SFF	TEB		1528	TO 1530, NR	1/1	2	2
23	"	"	PBF	TJS		1530	TO 1530, NR	1/1	3	5
28	"	"	TJS	PBF		1531	TO 1530, NR	1/1	2	5
29	"	"	PBF	TJS		1532	TO 1530, NR	1/1	2	6
29	"	"	TJS	TEB		1533	TO 1530, NR	1/1	2	5
3	B-727-31	N908JC	JAX	PBF		1534	TO 1530, NR	1/1	2	4
4	B-727-100	N908JC	MDA	MFA		1534	TO 1530, NR	4/4	1	4
5	C-1159B	N908JC	PBF	TEB		1535	TO 1530, NR	1/1	1	0
7	B-727-31	N908JC	PBF	LGA		1536	TO 1530, NR	1/1	2	6
7	"	"	LGA	ABQ		1537	TO 1530, NR	1/1	2	6
14	C-421B	N908GM	PBF	JAN		1538	TO 1530, NR	1/1	4	0
14	"	"	JAN	AMA		1539	TO 1530, NR	1/1	3	9
14	"	"	AMA	CEQ		1540	TO 1530, NR	1/1	3	6
15	"	"	CEQ	ABQ		1541	TO 1530, NR	1/1	1	7
15	"	"	ABQ	ZURK		1542	TO 1530, NR	1/1	5	5
16	B-727-31	N908JC	ABQ	PBF		1543	TO 1530, NR	1/1	3	8
Page Total									20/17	445
Amount Forward									8253	1
Total									6450	6

I certify that the statements made by me on this form are true.

Pilot's Signature

*Paul Padalen*

Date TS 2017	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles From	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To					
Aug 19	B-727-31	N908JG	PBI	HPN		7	36, GM, ET, HPN, FLARE, RESEARCH	1/	ASB RPT GUD32 HEDGEM
24	"	"	HPN	PBI		8	36, GM, ET, HPN, FLARE, RESEARCH	1/	25
27	"	"	PBI	HPN		9	36, GM, ET, HPN, FLARE, RESEARCH	1/	24
29	"	"	HPN	TLS		10	36, GM, ET, HPN, FLARE, RESEARCH	1/	26
30	G-1157A	N908JG	PBI	PBI		11	36, GM, ET, HPN, FLARE, RESEARCH	1/	37
Sep 3	B-727-31	N908JG	TLS	HPN		12	36, GM, ET, HPN, FLARE, RESEARCH	3/3	6
6	"	"	HPN	PBI		13	36, GM, ET, HPN, FLARE, RESEARCH	1/	37
9	"	"	PBI	HPN		14	36, GM, ET, HPN, FLARE, RESEARCH	1/	21
13	"	"	HPN	PBI		15	36, GM, ET, HPN, FLARE, RESEARCH	1/	27
14	C-172	N1446V	LNA	LNA		16	36, GM, ET, HPN, FLARE, RESEARCH	1/	26
Sep 14	B-727-31	N908JG	PBI	HPN		17	36, GM, ET, HPN, FLARE, RESEARCH	4/4	9
21	"	"	HPN	CYQX		18	36, GM, ET, HPN, FLARE, RESEARCH	1/1	27
22	"	"	CYQX	LFPB		19	36, GM, ET, HPN, FLARE, RESEARCH	1/	22
25	"	"	LFPB	CYQX		20	36, GM, ET, HPN, FLARE, RESEARCH	1/	49
25	"	"	CYQX	HPN		21	36, GM, ET, HPN, FLARE, RESEARCH	1/	55
28	"	"	HPN	PBI		22	36, GM, ET, HPN, FLARE, RESEARCH	1/	30
Sep 25	"	"	PBI	ABQ		23	36, GM, ET, HPN, FLARE, RESEARCH	1/	27
8	"	"	ABQ	HPN		24	36, GM, ET, HPN, FLARE, RESEARCH	1/	40
8	"	"	HPN	JAX		25	36, GM, ET, HPN, FLARE, RESEARCH	1/	37
I certify that the statements made by me on this form are true.									22
Pilot's Signature: <i>David Rodger</i>									17
Page Total									55
Amount Forward									83276
Total to Date									33112

CONFIDENTIAL DR\_000049

CONFIDENTIAL DR\_000050

Date 19 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ABFLAND	GLARE
15 Oct	C-172R	N395SP	LNA	LNA				3/3	5	16
15	"	N395SP	LNA-BCT-LNA	LNA			LARRY MURKIN - BFR SATISFACTORY STATUS, MCA, STEADY HANDLING, ETC.	4/4	13	
9	B-727-31	N908JE	JAX	LCQ			24 NO PASSENGERS	1/1	5	
10	G-1159B	N909JK	PBI	TEB			1537 NO PASSENGERS	0/0	25	
11	"	"	TEB	PBI			1534 JG SARAH KELLEN		23	
15	"	"	PBI	TEB			1540 JG, DM, SK, LARRY, STEVEN, FEMALE	1/1	24	
17	"	"	TEB	TEB			1541 JG, BONNIE	1/1	8	
17	"	"	TEB	TEB			1542 JG, BONNIE		10	
18	"	"	TEB	TEB			1543 JG, GM, AP, SK, 2 FEMALE		35	
23	"	"	TEB	TEB			1544 JG, GM, AP, SK, STEVEN, BONNIE, LARRY, STEVEN, FEMALE	1/1	40	
26	"	"	TEB	PBI			1545 JG, STEVEN, BONNIE, LARRY, STEVEN, FEMALE		26	
30	"	"	PBI	LCQ			1546 JG, SARAH KELLEN, JULIE	1/1	10	
30 Nov	"	"	LCQ	TEB			1547 JG, SK, JULIE	1/1	20	
3	"	"	TEB	SAF			1548 JG, GM, SK	1/1	40	
5	"	"	SAF	ASC			1549 JG, GM, SK	1/1	8	
5	"	"	ASC	PBI			1550 JG, GM, SK	1/1	37	
6	"	"	PBI	CMH			1551 JG, SK BELLA WYNNE, GUNDA	1/1	24	
6	"	"	CMH	TEB			1552 JG, SK		14	
9	"	"	TEB	LCQ			1553 JG, AP, SK, JULIE	1/1	22	
I certify that the statements made by me on this form are true.								Page Total 16		
Pilot's Signature								Amount Forward 6467		
								Total for Data 6467		
								3 3 112 6		
								3 12 110 1		



GIUFFRE007105  
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CONFIDENTIAL DR\_000052

Date of Flight	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight Hours	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Category	Hours
4	C-42B	N908GM	ZAKRO	SAF			PARACHUTE, 2 MEN (STANDARD PARACHUTES)	1/1	5	
4	"	"	SAF	ZAKRO			PARACHUTE, 2 MEN (STANDARD PARACHUTES)	1/1	5	
4	"	"	ZAKRO	ZAKRO			ALONG VIBROK TAKING PICTURES OF THE LA HOUSE	1/1	5	
30 DEC 2007	B-727-31	N908JC	HPN	PBI		33	35 GM, GB, JP, KC	1/1	2.5	
4	"	"	PBI	ISP		34	35 GM	1/1	2.5	
4	"	"	ISP	PBI		35	35 GM	1/1	2.7	
9	"	"	PBI	TEST		36	35 GM, AP, 150000	1/1	2.2	
13	"	"	TEST	HPN		37	35 GM, SK, AP, GT, CU, CD	1/1	4.0	
15	"	"	HPN	CMH		38	35, SL, 2 500000 2. MARCH	1/1	1.5	
16	"	"	CMH	PBI		39	35	1/1	2.1	
17	"	"	PBI	TEST		40	35 GM, SK, 150000	1/1	2.6	
26	"	"	TEST	TLPL		41	35 GM, SK, AP, PLUG, PARACHUTE, 150000	1/1	1.1	
26	"	"	TLPL	PBI		42	35 GM, SK, AP, PLUG, PARACHUTE, 150000	0/0	3.6	
30 JAN 2008	"	"	PBI	TEST		43	35 GM, AP, SK, 1 FEMALE	1/1	2.4	
11	"	"	TEST	EWK		44	35 GM, SK, AP, PLUG, PARACHUTE, 150000	1/1	4.1	
13	G-1159B	N909JC	PBI	PBI		45	35 GM, PLUG, PARACHUTE, 150000	1/1	2.6	
13	"	"	MPV	PBI		45	35 GM, PLUG, PARACHUTE, 150000	1/1	1.5	
14	B-727-31	N908JC	PBI	LGAT		46	35 GM	1/1	1.7	
I certify that the statements made by me on this form are true.									Page Total	
									13	40.8
Pilot's Signature									Amount Forward	8450.1
									Total to Date	23.117

CONFIDENTIAL DR\_000053

Date 10-2-2012	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Misc Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			
			From	To				Category	Grade		
15	B-727-31	N9103JE	LGX	BED	47	JE	1/1	1	1		
15	"	"	BED	HPN	48	JE, GM, SK, AP, CNDY LORR		8			
17	"	"	HPN	TEST	49	JE, GM, SK, AP, CNDY LORR		3	4		
20	"	"	TEST	PBI	50	JE, GM, SK, AP, CNDY LORR	1/1	2	6		
22	"	"	PBI	HPN	51	JE, GM, SK, AP, CNDY LORR	1/1	2	5		
25	"	"	HPN	PBI	52	JE, GM, SK, AP, CNDY LORR		2	7		
27	"	"	PBI	TEST	53	JE, GM, SK, AP, CNDY LORR	1/1	2	4		
30	"	"	TEST	JFK	54	JE, GM, SK, AP, CNDY LORR	1/1	3	7		
31	"	"	JFK	PBI	55	JE, GM, SK, AP, CNDY LORR	1/1	2	8		
9	"	"	PBI	MDA	56	JE, SK, AP					
9	"	"	MDA	HPN	57	JE, GM, SK, AP, CNDY LORR		2	6		
10	"	"	HPN	LFB	58	JE, GM, SK, AP, CNDY LORR	1/1	6	5		
13	"	"	LFB	ESSA	59	JE, SK	1/1	2	2		
14	"	"	ESSA	LML	60	JE, SK	1/1	2	4		
15	"	"	LML	GGW	61	JE, SK		1	8		
15	"	"	GGW	BGR	62	JE, GM, SK		7	2		
16	"	"	BGR	PBI	63	JE, GM, SK		3	5		
18	G-1154B	N9109JE	PBI	ABY	1551	JE	1/1	1	4		
18	"	"	ABY	PBI	1560	EMPTY	1/1	1	1		
<p>I certify that the statements made by me on this form are true.</p> <p>Pilot's Signature: <i>[Signature]</i></p>							<p>Page Total: 19</p> <p>Amount Forwarded: 6567</p> <p>Total to Date: 6517</p>	<p>51</p> <p>8400</p> <p>8541</p>	<p>0</p> <p>9</p> <p>9</p>	<p>33</p> <p>33</p> <p>33</p>	<p>112</p> <p>112</p> <p>112</p>

CONFIDENTIAL DR\_000054

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ATP/AD	GL/AD
2000 Feb 18	B-727-31	N908JE	PBI	ABY		64	GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1	1	1
18	"	"	ABY	JFK		65	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL		2	1
20	"	"	JFK	MIR4		66	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL		5	9
23	"	"	MIR4	VNY		67	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
23	"	"	MIR4	VNY		68	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
23	"	"	VNY	JFK		69	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
25	G-115AB	N908JE	JFK	ABY		70	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
25	"	"	TGB	ABY		71	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
28	B-727-31	N908JE	JFK	PBI		72	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
28	B-727-200	SPMUL050C	MED	MED		73	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
7	"	"	"	"		74	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
7	"	"	"	"		75	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
8	"	"	"	"		76	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
10	B-727-31	N908JE	TSS	JFK		77	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
14	"	"	JFK	PBI		78	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
17	"	"	PBI	JFK		79	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
19	"	"	JFK	EGGW		80	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
21	"	"	EGGW	JFK		81	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
22	"	"	JFK	PBI		82	30 GM, SK, GLEN DUBEN, 2 REMAINS SCHUBERT COOL	1		
Page Total Amount Forward Total to Date								82	56	6

I certify that the statements made by me on this form are true.

Pilot's Signature: *David Reddy*



I certify that the statements made by me on this form are true.

Pilot's Signature David Rodage

[illegible]



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Family Letters

GIUFFRE007112  
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GIUFFRE007113  
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GIUFFRE007114  
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CONFIDENTIAL DR\_000061

Date 19	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miss From	Flight No.	Registration, Procedures, Endorsements	Number of Landings	Aircraft Category...	
			From	To					255/256	6.6.1.1.1
18	B-727-314	N408JC	PBI	TEST		105	REGISTRATION	1/1	2	4
19	"	"	TEST	LPBZ		106	REGISTRATION, ANTI-COLLISION LIGHTS			
19	"	"	LPBZ	LPBZ		107	REGISTRATION, ANTI-COLLISION LIGHTS	1/1	5	6
22	"	"	LPBZ	ENKCH		108	REGISTRATION, ANTI-COLLISION LIGHTS		4	1
22	"	"	ENKCH	UUNW		109	REGISTRATION, ANTI-COLLISION LIGHTS		1	8
24	"	"	UUNW	VLLI		110	REGISTRATION, ANTI-COLLISION LIGHTS	1/1	2	5
24	"	"	VLLI	ENKCH		111	REGISTRATION, ANTI-COLLISION LIGHTS		1	4
24	"	"	ENKCH	JFK		112	REGISTRATION, ANTI-COLLISION LIGHTS		3	6
26	"	"	JFK	PBI		113	REGISTRATION, ANTI-COLLISION LIGHTS		1	6
26	"	"	PBI	JFK		114	REGISTRATION, ANTI-COLLISION LIGHTS		2	7
26	"	"	JFK	PBI		115	REGISTRATION, ANTI-COLLISION LIGHTS		2	5
5	"	"	PBI	JFK		116	REGISTRATION, ANTI-COLLISION LIGHTS		2	3
9	"	"	JFK	TEST		117	REGISTRATION, ANTI-COLLISION LIGHTS	1/1	2	4
15	"	"	TEST	PBI		118	REGISTRATION, ANTI-COLLISION LIGHTS		2	5
21	G-1154B	N408JC	PBI	ADY		119	REGISTRATION, ANTI-COLLISION LIGHTS	1/1	1	2
21	"	"	ADY	PBI		120	REGISTRATION, ANTI-COLLISION LIGHTS		1	1
23	"	"	PBI	TEST		121	REGISTRATION, ANTI-COLLISION LIGHTS	1/1	2	3
23	"	"	TEST	PBI		122	REGISTRATION, ANTI-COLLISION LIGHTS	1/1	2	8
6	"	"	PBI	TEB		123	REGISTRATION, ANTI-COLLISION LIGHTS		2	4
9	"	"	TEB	PBI		124	REGISTRATION, ANTI-COLLISION LIGHTS		2	4
I certify that the statements made by me on this form are true.									Page Total	
									7/6	53 1
									6567	8846 1
									6574	8849 2
									33	113
									33	113

Amal B. Adhikari

CONFIDENTIAL DR\_000062

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					PERFORMANCE	HEADING
10/15/53	10/15/53	10/15/53	PBI	PBI			10/15/53	10/15/53	10/15/53	10/15/53
11	11	11	PBI	PBI			11	11	11	11
13	13	13	PBI	PBI			13	13	13	13
17	17	17	PBI	PBI			17	17	17	17
22	22	22	PBI	PBI			22	22	22	22
25	25	25	PBI	PBI			25	25	25	25
26	26	26	PBI	PBI			26	26	26	26
31	31	31	PBI	PBI			31	31	31	31
38	38	38	PBI	PBI			38	38	38	38
3	3	3	PBI	PBI			3	3	3	3
7	7	7	PBI	PBI			7	7	7	7
11	11	11	PBI	PBI			11	11	11	11
12	12	12	PBI	PBI			12	12	12	12
13	13	13	PBI	PBI			13	13	13	13
17	17	17	PBI	PBI			17	17	17	17
17	17	17	PBI	PBI			17	17	17	17
23	23	23	PBI	PBI			23	23	23	23
25	25	25	PBI	PBI			25	25	25	25
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GIUFFRE007117  
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Final Report

GIUFFRE007119  
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cedly that the statements made by me on this form are true.

Farid Lodana

GIUFFRE007120  
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GIUFFRE007121  
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GIUFFRE007122  
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CONFIDENTIAL DR\_000069

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ATIS/PAK	GUION/ HCL...
2003 May	B-727-314	N908JE	CMH	TEST	257	257	34, SK	1	3	7
22	"	"	TEST	PBI	238	238	34, SK, NICK CARADON	1	2	7
23	"	"	PBI	JFK	239	239	34, SK, NICK CARADON	1	2	4
25	"	"	JFK	PBI	240	240	34, SK, NICK CARADON	1	2	5
06	G-1159B	N909JE	NAV	JFK	1678	1678	34, SK, NICK CARADON	1	1	3
7	"	"	JFK	CMH	1679	1679	34, SK, NICK CARADON	1	1	5
7	"	"	CMH	PBI	1680	1680	34, SK, NICK CARADON	1	2	3
9	"	"	PBI	TEST	1681	1681	34, SK, TD	1	2	4
15	"	"	TEST	TAB	1682	1682	34, SK, TD, REMARKS	1	4	5
19	"	"	TAB	TEST	1683	1683	34, SK, CM, SK	1	3	9
24	"	"	TEST	PBI	1684	1684	34, SK, CM, BT	1	2	7
26	"	"	PBI	TEST	1685	1685	34, SK, BT, CM	1	2	3
2004 Jan	"	"	TEST	PBI	1686	1686	34, SK, BT, CM, REMARKS	1	2	7
3	"	"	PBI	FSM	1687	1687	34, SK, BT, CM, REMARKS	1	7	7
3	"	"	FSM	PBI	1688	1688	34, SK, BT, CM, REMARKS	1	7	7
5	"	"	PBI	TEST	1689	1689	34, SK, BT, CM, SK	1	2	5
8	"	"	TAB	PBI	1690	1690	34, SK, BT, CM, SK	1	2	6
12	B-727-314	N908JE	PBI	JFK	241	241	34, SK, BT, CM, REMARKS	1	2	4
15	"	"	JFK	PBI	242	242	34, SK, BT, CM	1	2	5
Pilot's Signature: <i>David R. Riden</i>								Page Total: 10/6		
Amount Forward: 6727								Total to Date: 93315		
								Total to Date: 33125		

CONFIDENTIAL DR\_000070

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					APRPLAN	HELIX
2001	B-727-314	N908JG	PBI	JFK		243	36, BT, NM, SK, TD		2	6
23	"	"	JFK	PBI		244	36, BT, NM, SK, TD		2	6
26	G-1159B	N909JG	PBI	TED		164	36, BT, NM, TD	1	2	4
28	"	"	TED	TIST		162	36, BT, NM, SK, TD		3	6
28	"	"	TIST	TED		163	36, BT, NM, TD, SK, TD	1	4	1
5	"	"	TED	BED		164	36, BT, NM, TD		8	
5	"	"	BED	TED		165	ALAN WEBER		1	1
5	"	"	TED	PBI		166	36, BT, NM, SK, TD		2	6
9	B-727-314	N908JG	PBI	JFK		245	36, BT, NM, SK, TD	1	2	5
12	"	"	JFK	LFB		246	36, BT, NM, SK, TD		7	0
17	"	"	LFB	BGR		247	36, BT, NM, SK, TD		6	9
17	"	"	BGR	JFK		248	36, BT, NM, SK, TD		1	5
19	"	"	JFK	PBI		249	36, BT, NM, SK, TD		2	4
22	"	"	PBI	JFK		250	36, BT, NM, TD, AW	1	3	0
24	"	"	JFK	MR4		251	36, BT, NM, TD, AW		5	9
27	"	"	MR4	VNY		252	36, BT, NM, SK, TD	1	8	
29	"	"	VNY	ABQ		253	36, BT, NM, SK, TD		1	6
1	"	"	ABQ	JFK		254	36, BT, NM, SK, TD	1	3	4
3	"	"	JFK	PBI		255	36, BT, NM, TD, VALDEN CORP		2	5
Page Total									6747	9315
Amount Forward									6750	9318
Total to Date									9388	9312

I certify that the statements made by me on this form are true.

*Daniel Pedalino*

Official Statement



CONFIDENTIAL DR\_000071

Date to 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles From	Flight No.	Remarks, Procedures, Maneuvers, Etc.	Number of Landings	Aircraft Category...	
			From	To					ARRIVAL	HELICOPTER
12 MAR	G-1154B	N909JE	PBI	TEB		167	JE, NM, TD	✓	2	8
8	"	"	TEB	BGD		168	JE, TD	✓	8	
9	"	"	BGD	TEB		169	JE, TD	✓	1	1
11	"	"	TEB	PBI		170	JE, TD, SK, NM	✓	2	6
13	"	"	PBI	TIST		171	JE, TD, SK, NM	✓	2	3
17	B-727-200	SEMUL900	MED	MED		172	JE, TD, SK, NM	✓	2	0
17	"	"	MED	MED		173	JE, TD, SK, NM	✓	2	0
17	"	"	MED	MED		174	JE, TD, SK, NM	✓	2	0
18	"	"	MED	MED		175	JE, TD, SK, NM	✓	2	0
18	"	"	MED	MED		176	JE, TD, SK, NM	✓	2	0
19	G-1154B	N909JE	TIST	PBI		177	JE, TD, SK, NM	✓	2	6
31 APR	B-727-31A	N908JE	PBI	JFK		178	JE, TD, SK, NM	✓	2	3
6	G-1154B	N909JE	JFK	PBI		179	JE, TD, SK, NM	✓	2	3
11	B-727-31A	N908JE	PBI	JFK		180	JE, TD, SK, NM	✓	2	4
15	"	"	JFK	BGD		181	JE, TD, SK, NM	✓	2	6
16	"	"	BGD	PBI		182	JE, TD, SK, NM	✓	2	6
19	"	"	PBI	JFK		183	JE, TD, SK, NM	✓	2	5
22	"	"	JFK	PBI		184	JE, TD, SK, NM	✓	2	5
I certify that the statements made by me on this form are true.										
Pilot's Signature										
Page Total									9/4	
Amount Forward									6326	
Total to Date									6385	



CONFIDENTIAL DR\_000072

Date +8 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRPLANE	GUIDEL
27 APR 04	B-72-31H	N90836	PBI	JFK		263	36, BT, NM, TD	1	22	
28 APR 04	"	"	JFK	PBI		264	36, NM, SK	1	26	
29 APR 04	"	"	PBI	JFK		265	36, NM, SK	1	24	
30 APR 04	"	"	JFK	LFPB		266	36, NM, SK	1	69	
1 MAY 04	"	"	LFPB	EGGW		267	36, NM, SK	1	9	
2 MAY 04	"	"	EGGW	LKPR		268	36, NM, SK	1	18	
3 MAY 04	"	"	LKPR	LFPB		269	36, NM, SK	1	14	
4 MAY 04	"	"	LFPB	CYQX		270	36, NM, SK	1	58	
5 MAY 04	"	"	CYQX	PBI		271	36, NM, SK	1	42	
6 MAY 04	G-189B	N90476	PBI	PBI		1707	RON	1	7	
7 MAY 04	"	"	PBI	TGB		1708	36, BT, NM, TD	1	32	
8 MAY 04	"	"	TGB	PBI		1709	36, BT, NM, TD	1	24	
9 MAY 04	"	"	PBI	TST		1710	36, NM, SK, TD	1	26	
10 MAY 04	"	"	TST	TGB		1711	36, NM, SK, TD	1	42	
11 MAY 04	"	"	TGB	HVN		1712	36, NM, SK, TD	1	5	
12 MAY 04	"	"	HVN	PBI		1713	36, BT, NM, TD	1	27	
13 MAY 04	"	"	PBI	TGB		1714	36, BT, NM, TD	1	25	
14 MAY 04	"	"	TGB	BEO		1715	36, NM, SK	1	9	
15 MAY 04	"	"	BEO	TGB		1716	36, NM, SK	1	18	
Page Total									77	487
Amount Forward									6150	9431
Total to Date									6766	9479

I certify that the statements made by me on this form are true.

David Reddy

Pilot's Signature

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ARRIVAL	DEPART
10-1-2004	G-1159B	N909JE	TEB	MOW		1712	SK	1/1	19	
11	"	"	MOW	PBI		1714	SK		27	
13	B-727-314	N908JE	PBI	JFK		2713	SK, A.O.G., MM, LV		25	
15	"	"	JFK	TST		2713	SK, MS, SK, TD	1/1	35	
20	"	"	TST	PBI		2714	SK, MS, SK, TD	1/1	25	
21	G-1159B	N909JE	PBI	TEB		1719	SK, MS, NM		26	
23	"	"	TEB	SAC		1720	SK, NM, SK	1/1	44	
24	"	"	SAC	LAS		1721	SK, MS, NM, SK, MS, NM, GR	1/1	16	
2	"	"	LAS	SAC		1722	SK, MS, NM, SK, MS, NM, GR		13	
4	"	"	SAC	ASC		1723	SK, MS, NM, SK, MS, NM, GR	1/1	9	
4	"	"	ASC	PBI		1724	SK, MS, NM, SK, MS, NM, GR	1/1	38	
11	"	"	PBI	TEB		1725	SK, MS, NM, SK, MS, NM, GR		27	
15	"	"	TEB	PBI		1726	SK, MS, NM, SK, MS, NM, GR	1/1	26	
19	B-727-314	N908JE	PBI	TST		2715	SK, MS, NM, SK, MS, NM, GR		26	
22	"	"	TST	PBI		2716	SK, MS, NM, SK, MS, NM, GR		26	
25	"	"	PBI	JFK		2717	SK, MS, NM, SK, MS, NM, GR	1/1	24	
29	"	"	JFK	LGPB		2718	SK, MS, NM, SK, MS, NM, GR		66	
3-3	"	"	LGPB	LGPB		2719	SK, MS, NM, SK, MS, NM, GR	1/1	17	
3	"	"	LGPB	LPAZ		2800	SK, MS, NM, SK, MS, NM, GR	1/1	36	
Page Total									119	725
Amount Forward									94718	33125
Total to Date									95323	33125

I certify that the statements made by me on this form are true.

*Daniel R. Peterson*

Signature

CONFIDENTIAL DR\_000073

Charles Roden



CONFIDENTIAL DR\_000075

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight Hours	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					Category	Value	
2-16-4	B-72-71H	N9081E	TEST	PBI		333	350 JK, NM, SK, ANDREW	1	2	4	
17	"	"	PBI	SEK		341	350 JK, NM, SK, ANDREW	1	2	5	
20	"	"	JK	LFB		322	350 JK, NM, SK, ANDREW	1	6	3	
25	"	"	LFB	JK		303	350 JK, NM, SK, ANDREW	1	7	6	
25	"	"	JK	JAX		304	350 JK, NM, SK, ANDREW	1	2	1	
29	G-1154B	N9091E	PBI	TEB		172	172 JE, JK, NM, NATALIE	1	2	6	
29	"	"	TEB	PBI		173	173 JE, JK, NM, NATALIE	1	2	3	
1	"	"	PBI	TEST		171	171 JE, NM	1	2	6	
1	BHT-467	N491G-M	TEST	LSS							
1	"	"	LSS	TEST							
2	G-1154B	N9091E	TEST	TEB		172	172 JE, NM		4	6	
7	G-1154B	SENN-3700	DFW	DFW			STAFF TRAINING, STAFF, POSTMASTER, ELEM, SEC, ILS, ABBOT, GENERAL, ELEM, HOLDING, HUMAN, AUTOMATED, AIRPORTS, EMERGENCY, DISCOUNT, IED, WORKMAN, BOMB		4	6	
8	"	"	"	"							
9	"	"	PBI	TEB		174	174 JE, SK	1	2	7	
10	"	"	TEB	PBI		135	135 JE, SK		2	4	
14	"	"	PBI	ABY		174	174 JE, NM, SK, TD, VC		1	3	
14	"	"	ABY	TEB		177	177 JE, NM, SK, TD, VC		2	1	
16	"	"	TEB	BED		178	178 JE, ANDREA	1	8		
16	"	"	BED	TEB		179	179 JE, ANDREA		8		
I certify that the statements made by me on this form are true.								Page Total Amount Forward Total to Date	473 6183 6183	510 45874 46384	33 127 127

Pilot's Signature: *David Rodriguez*



CONFIDENTIAL DR\_000076

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Manifests, Endorsements	Number of Landings	Aircraft Category...
			From	To					
18 NOV 2004	G-1154B	N909JE	TGB	PBI		1746	JE, NM, SK, DM, LV	1	23
20	G-1154B	N908JE	JAX	JAX	335	335	LV	1	26
20	"	"	JAX	PBI	336	336	LV	1	10
23	"	"	PBI	TEST	337	337	JE, NM, SK, DM, LV	2	23
26	G-1154B	N909JE	PBI	TEST	1747	1747	GM, JK	1	24
28	G-1154B	N908JE	TEST	TEST	338	338	JE, NM, SK, NM, SK, DM, SH, LV	1	40
28	"	"	JFK	PBI	339	339	JE, NM, SK, SH, LV	1	28
14	G-1154B	N909JE	MED	MED			HANK COLLEGE - INSTRUCTION		18
15	"	"	"	"			HANK COLLEGE - INSTRUCTION		17
15	"	"	"	"			HANK COLLEGE - INSTRUCTION		17
21	G-1154B	N909JE	PBI	TEST		1748	JE, NM, SK, NM, GM	1	23
29	"	"	TEST	TNCM		1749	JE, NM, SK	1	7
29	"	"	TNCM	TEST		1747	JE, NM, SK	1	7
30	G-1154B	N909JE	TEST	TEST			LV		
30	"	"	TEST	TEST			LV		
30	G-1154B	N909JE	TEST	TEST		1748	JE, NM, SK, DM, NM, LV	1	6
1	"	"	TEST	TEST		1749	JE, NM, SK, DM, NM, SK, DM, LV	1	32
3	"	"	TEST	TEST		1750	JE, NM, GM, NM, SK	1	27
6	"	"	TEST	TEST		1751	JE, NM, NM	1	27
I certify that the statements made by me on this form are true.									
Page Total									7/5
Amount Forward									6187
Total to Date									6102

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CONFIDENTIAL DR\_000078

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Incidents, Blankets, Endorsements	Number of Landings	Aircraft Category...
			From	To					
24	B-727-310	N4053J	TFK	TEST		333	JE, NM, SK, DB, DM	1	36
24	"	"	TEST	TFK		334	JE, NM, SK, DB, DM	1	31
24	"	"	TFK	PBI		335	JE, NM, SK, DB, DM	1	28
24	G-115-1B	N4053J	SAV	PBI		186	JE, NM, SK, DB, DM	1	12
5	"	"	PBI	PBI		187	G-M	1	16
5	"	"	PBI	PBI		188	G-M	1	18
6	B-727-310	N4053J	PBI	TFK		336	JE, NM, SK, DB, DM	1	25
24	G-115-1B	N4053J	PBI	TEST		177	JE, NM, SK, DB, DM	1	23
24	"	"	TEST	TFK		178	JE, NM, SK, DB, DM	1	41
6	"	"	TFK	PBI		179	JE, NM, SK, DB, DM	1	25
10	"	"	PBI	TFK		180	JE, NM, SK, DB, DM	1	26
12	B-727-310	N4053J	TFK	TEST		337	JE, NM, SK, DB, DM	1	31
16	"	"	TEST	TFK		338	JE, NM, SK, DB, DM	1	33
19	G-115-1B	N4053J	TFK	PBI		181	JE, NM, SK, DB, DM	1	25
24	"	"	PBI	TFK		182	JE, NM, SK, DB, DM	1	26
24	"	"	PBI	TFK		183	JE, NM, SK, DB, DM	1	25
15	B-727-200	GENUINE	MIA	MIA			RICK MONROE - INSTRUCTOR		20
15	"	"	"	"			REY BARZANA - V RIDE		20
24	G-115-1B	N4053J	TFK	PBI		184	JE, NM, SK, DB, DM	1	24
Total									504
Amount Forward									97170
Total to Date									97674

I certify that the statements made by me on this form are true.

David P. Baker

CONFIDENTIAL DR\_000079

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
2025-06-10	G-1121B	N4104JE	PBI To TEB		168	JE, AM, SK	LV	25
10	"	"	TIST To TEB		169	JE, AM, DB, NM	BH	40
18	"	"	PBI To TEB		172	JE, DB, SK	LV	26
20	"	"	TEB To BKL		173	G-M, IAN	JLM Power	12
20	"	"	BKL To TEB		174	G-M, IAN	JLM Power	12
22	"	"	TEB To PBI		175	JE, SK, DB, TATIANA	BH	25
25	"	"	PBI To TEB		176	JE, SK, DB, TATIANA	BH	26
28	"	"	TEB To TIST		177	JE, NM, JK	BH	39
Aug 1	"	"	TIST To TEB		178	JE, JK, NM	BH	38
2	"	"	TEB To SAF		179	JE, SK, DB, AM, ALEX, NATOLIA, SEMBIA, TATIANA	BH	36
18	"	"	TEB To PBI		180	JE, SK, DB, AM, ALEX, NATOLIA, SEMBIA, TATIANA	LV	23
22	"	"	PBI To TEB		181	JE, NM	LV	25
24	"	"	TEB To FDK		182	JE, DB	LV	8
24	"	"	FDK To TEB		183	JE, DB	LV	8
26	"	"	TEB To MUY		184	JE, DB, SK, DM	LV	8
26	"	"	MUY To TIST		185	JE, DB, DM, SK	LV	33
27	"	"	TIST To PBI		186		LV	26
Aug 28	"	"	PBI To TEB		187	JE, DB, G-M, AM	BH	24
8	B-727-200	51-MUL-096	MFA To MFA		188	HPL LC-10 - K-1518 U-202	LM	20
I certify that the statements made by me on this form are true.							Page Total	12/11 454
							Amount Forward	6812 4767 4 3 3 12 11 4
							Total in Photo	6825 4767 4 3 3 12 11 4

David Ordover



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Fixed Order



100%

Walter J. Smith, III

Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles From No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		and Class	
			From	To				Category	Class	Category	Class
2006	G-1159B	N909JE	SAF	TEB		1851 2006-2007 SARAF, KILLER	0/9	32	3	3	3
26	"	"	TEB	TEB		1852 2006-2007 SARAF, KILLER		34	3	3	3
31	"	"	TIST	TEB		1853 2006-2007 SARAF, KILLER		38	3	3	3
31	"	"	TEB	TEB		1854 2006-2007 SARAF, KILLER		10	1	1	1
31	"	"	TEB	TEB		1855 2006-2007 SARAF, KILLER		40	4	4	4
15	"	"	TEB	TEB		1856 2006-2007 SARAF, KILLER		30	3	3	3
16	"	"	TEB	TEB		1857 2006-2007 SARAF, KILLER		24	2	2	2
21	"	"	TEB	TEB		1858 2006-2007 SARAF, KILLER		41	4	4	4
22	"	"	TEB	TEB		1859 2006-2007 SARAF, KILLER		9	1	1	1
22	"	"	TEB	TEB		1860 2006-2007 SARAF, KILLER		3	3	3	3
24	"	"	TEB	TEB		1861 2006-2007 SARAF, KILLER		41	4	4	4
26	"	"	TEB	TEB		1862 2006-2007 SARAF, KILLER		42	4	4	4
26	"	"	TEB	TEB		1863 2006-2007 SARAF, KILLER		8	1	1	1
13	"	"	TEB	TEB		1864 2006-2007 SARAF, KILLER		10	1	1	1
14	"	"	TEB	TEB		1865 2006-2007 SARAF, KILLER		34	3	3	3
16	"	"	TEB	TEB		1866 2006-2007 SARAF, KILLER		20	2	2	2
23	B-727-200	SEMULWATER	MIA	MIA		1867 2006-2007 SARAF, KILLER		25	2	2	2
23	"	"	"	"		1868 2006-2007 SARAF, KILLER		20	2	2	2
24	"	"	"	"		1869 2006-2007 SARAF, KILLER		50	5	5	5
Total							6847	9889	33	129	4
Total to Date							6847	9889	33	129	4

CONFIDENTIAL DR 000082

Pilot's Signature: David Rodriguez

I certify that the statements made by me on this form are true.

I certify that the statements made by me on this form are true.

Pavel Ledogor



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GIUFFRE007138  
CONFIDENTIAL

certify that the statements made by me on this form are true.

Editor's Signature \_\_\_\_\_





Pilot's Signature: Dave Lodge

Pilot's Signature \_\_\_\_\_



Paul Bridger  
Pilot's Signature

Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Measurements, Endorsements	Number of Landings	Aircraft Category		and Class		HAZID
			From	To					ACRONE	CAIDEN	SEL	MEL	
2007 Aug 12	B-727-407	N901GM	TIST	TIST									3
13	B-727-31H	N908JG	TIST	EWB		465		LV	37				37
15	G-1159B	N909JG	MIA	PBI		1902		LV	5				5
16	B-727-31H	N908JG	EWB	VNY		466		LV	54				54
16	"	"	VNY	ABQ		467		LV	17				17
21	"	"	ABQ	MEB		468		LV	36				36
21	"	"	MIA	TIST		469		LV	25				25
27	"	"	TIST	EWB		470		LV	37				37
29	G-1159B	N909JG	PBI	TIST		1903		LV	25				25
30	"	"	TIST	HPN		1904		LV	5				5
30	"	"	HPN	TIST		1905		LV	37	CONFIDENTIAL	DR-0000893		7
30	B-727-31H	N908JG	EWB	PBI		471		LV	24				24
18	G-1159B	N909JG	TIST	TIST		1905		LV	36				36
30	B-727-31H	N908JG	TIST	EWB		474		LV	36				36
30	"	"	EWB	LFPI		475		LV	70				70
12	"	"	LFPI	LPAZ		476		LV	33				33
12	"	"	LPAZ	TIST		477		LV	54				54
15	"	"	TIST	EWB		478		LV	37				37
18	G-1159B	N909JG	TIST	BEO		1906		LV	10				10
Page Total								578	578				578
Amount Forward								102302	102302				102302
Total to Date								6891	6891				6891

I certify that the statements made by me on this form are true.

David Redge

Pilot's Signature



Instructions

CONFIDENTIAL

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category		SEL and Class		HOLZGER	
			From	To				ARRIVING	DEPARTING	SEL	MEL		
2007 OCT 18	G-1159B	N909JE	BED	TIST	1957	BH		35			35		
25	"	"	TEB	TIST	1959	LV		36			36		
26	B-72-31H	N908JE	TEB	VQQ	479	BH		23			23		
26	G-1159B	N909JE	TIST	TEB	1962	LV	1/1	40			40		
8	"	"	TEB	TIST	1963	LV		38			38		
15	"	"	TEB	TIST	1967	BH		36			36		
17	"	"	TIST	TEB	1968	BH	1/1	39			39		
17	"	"	TEB	TIST	1969	BH	1/1	9			9		
21	"	"	TIST	TEB	1970	BH		35			35		
26	"	"	TIST	TEB	1971	LV		41		CONFIDENTIAL DR	41		
DEC 2	"	SI-MACOSTAR	TEB	TEB		HOLDING		40			40		
3	"	"	TEB	TEB		TEB		30			30		
11	"	N909JE	TIST	TEB	1976	LV		40			40		
13	"	"	TEB	PWM	1977	LV	1/1	10			10		
14	"	"	PWM	TEB	1978	LV		8			8		
14	"	"	TEB	TEB	1979	LV		11			11		
14	"	"	TEB	MIA	1980	LV		28			28		
18	"	"	TIST	PBI	1982	LV	1/1	28			28		
18	"	"	PBI	TEB	1983	LV		24			24		
Page Total							5/5	551			551		
Amount Forward							6991	102960		33165	9	21768819	2514
Total to Date							6985	102511		33165	9	21768814	3514

I certify that the statements made by me on this form are true.

Pilot's Signature: *E. and Cardage*

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Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	and Class
			From To						
2007									
2008	G-1159B	N909JE	TGB TIST		1984	LV		35	SGL MEL
2008	"	"	TIST TGB		1985	LV	1/1	39	39
11	"	"	TGB TIST		1986	LV		35	35
16	B-727-200	SIMULATOR	MIA MIA					20	20
16	"	"	" "					20	20
17	"	"	" "					20	20
18	"	"	" "					20	20
26	G-1159B	N909JE	EWB TGB		1994	LV		5	5
Feb 5	"	"	TIST TGB		1995	BH	1/1	42	42
8	"	"	TGB SAF		1996	BH		40	40
12	"	"	SAF MFA		1997	LV	1/1	37	37
13	"	"	MFA TGB		1998	BH		24	24
15	"	"	TGB TIST		1999	BH		34	34
24	"	"	TIST TGB		2000	BH		40	40
27	"	"	TGB BGD		2001	LV		9	9
27	"	"	BGD TGB		2002	LV		10	10
29	"	"	TGB TIST		2003	LV		35	35
Mar 6	B-727-314	N908JE	VQQ VQQ		480	BH		16	16
8	G-1159B	N909JE	TGB BGD		2003	BH		8	8
I certify that the statements made by me on this form are true.									
Pilot's Signature									
David Rodriguez									
Page Total							3/2	493	49
Amount Forward							686	103511	217638174
Total to Date							686	104004	217638223



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Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	Aircraft Make and Model	SEL	MEL
			From To								
2008 MAY 8	G-1154B	N909JE	BED TEB		2004			10			1
8	"	"	TEB ACY		2005			6			
9	"	"	ACY TEB		2006		1/1	7			
16	B-727-214	N908JE	VQQ LCQ		481			4			4
16	G-1154B	N909JE	TIST EWR		2010			42			2
21	"	"	EWB SST		2011			20			2
21	"	"	SST TIST		2012			29			2
24	"	"	TIST TEB		2013		1/1	37			3
25	S-76	N908GM	MGS RWI					24			2
25	S-76	N908GM	RWI HXD					CONFIDENTIAL	DR-000092		
26	"	"	HXD DAB					14			
26	"	"	DAB PBI					35			
28	G-1154B	N909JE	TIST TEB		2014			34			
15	"	"	TIST TEB		2016		1/1	37			
17	"	"	TEB EINN		2017			61			
18	"	"	EINN LFPB		2018			16			
22	"	"	LFPB LLBG		2019		1/1	42			
25	"	"	LLBG LGR		2021			15			
I certify that the statements made by me on this form are true.							Page Total	4/3	395	75	
Pilot's Signature							Amount Forward	6889	10100	4	2176
							Total to Date	6893	10194	9	2176
								6488	9	33173	4

David Rodriguez

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Marine Corps

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		and Class	
			From	To					AIRPLANE	CLERK	SEL	MEL
2006 APR 15	G-1159B	N909JE	LGIR	LFPB		2022	LV		34			34
24	"	"	LFPB	CYJT		2023	LV	1/1	58			58
29	"	"	CYJT	TEB		2024	LV	1/1	25			25
APR 17	"	"	TJST	TEB		2025	BA	1/1	41			41
22	"	"	TEB	TJST		2026	LV		35			35
23	BHT-467	N491GM	LSS	TJST			LV					
26	"	"	LSS	LSS			NVA					
27	G-1159B	N909JE	TJST	TEB		2030	LV	1/1	38			38
29	B-727-31H	N908JE	PBT	LCQ		483	BA		9			9
29	G-1159B	N909JE	TEB	MIV		2631	BA			CONFIDENTIAL DR_00009B		
31	B-727-31H	N908JE	LCQ	VQR		484	BA		4			
JUL 11	G-1159B	N909JE	TJST	PDK		2034	BA	1/1	39			39
11	"	"	PDK	TEB		2035	BA	1/1	19			19
JUL 12	B-727-31H	N908JE	VQR	PBI		485	BA		9			9
AUG 18	B-727-200	SIMULATOR	MIA	MIA			BA		20			20
SEP 21	G-1159B	N909JE	PBT	PBI		2038	LV	3/3	11			11
20	"	"	"	"		2044	LV		10			10
22	"	"	"	SEF		2045	LV		5			5
22	"	"	SEF	PBI		2046	LV		5			5
I certify that the statements made by me on this form are true.								Page Total				
								9/8		369		
								Amount Forward		161391		
								Total to Date		33173		
										4		
										217688265		
										217688300		

P. David Rodriguez  
Pilot's Signature



I certify that the statements made by me on this form are true.

GIUFFRE007148  
CONFIDENTIAL

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category	...and Class
			From	To				Amount	SEL
2010	G-1159B	N909JE	PBI	TAB				2 9	
12	"	"	TAB	PBI	2055			2 4	
13	"	"	PBI	TIST	2056			2 4	
15	"	"	TIST	PBI	2057			2 4	
15 Feb	"	"	PBI	TAB	2058			2 8	
1	"	"	TAB	BED	2059			2 4	
2	"	"	BED	TAB	2060			2 4	
2	"	"	TAB	BCT	2061			2 4	
2	"	"	BCT	TIST	2062			2 4	
3	"	"	TIST	PBI	2063			2 4	
5	"	"	PBI	DFW	2064			2 4	
10	G-1159A	SPMULATOR	DFW	DFW		HOLDING PATTERNS		2 4	
11	"	"	DFW	DFW		HOLDING		2 4	
16	G-1159B	N909JE	PBI	TIST	2065			2 4	
16	"	"	TIST	PBI	2066			2 4	
18	"	"	PBI	TAB	2067			2 4	
19	"	"	TAB	PBI	2068			2 4	
23	"	"	PBI	TAB	2069			2 4	
24	"	"	TAB	PBI	2070			2 4	
27	B-72-31H	N908JE	VQQ	PBI	490			2 4	

I certify that the statements made by me on this form are true.

Pilot's Signature: *David L. Dege*

Page Total	4/4
Amount Forward	6404
Total to Date	6408

Amount	3 3 173 8
SEL	2 176 8



suojruisu

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	SEL MGL
			From	To					
2010 MAR 2	G-1159B	N909JE	PBI	TEB	2670	LV	1/1	ADOLPH GLEDGE HELICOPTER	24
3	"	"	TEB	BCT	2672	LV	1/1		30
5	"	"	BCT	TIST	2673	LV	1/1		23
5	"	"	TIST	PBI	2674	LV	1/1		29
15	B-727-200	SPMULR	MIA	MIA		FE RECORDING YALOWING CAPT ROBERTSON LV HALL 1570			15
15	"	"	"	"		JOHN ROBERTSON			15
22	G-1159	N530GA	PBI	PTK	2675	LV	1/1		24
25	G-1159B	N909JE	PBI	TEB	2676	LV	1/1		25
26	"	"	TEB	PBI	2677	LV	1/1		26
29	"	"	PBI	TIST	2678	LV	1/1		23
29 APR 7	"	"	TIST	PBI	2679	LV	1/1	CONFIDENTIAL DR_000096	29
8	"	"	PBI	TEB	2680	LV	1/1		24
19	"	"	TEB	PBI	2681	LV	1/1		27
19	"	"	PBI	BED	2682	LV	1/1		26
20	"	"	BED	TEB	2683	LV	1/1		26
29	"	"	TEB	PBI	2684	LV	1/1		25
30 APR 2	B-727-200	SPMULR	MIA	MIA	2685	LV	1/1		15
BELL HAMMOCK CHECK RIDE									
Page Total							5/7	44	44
Amount Forward							698	1655	1655
Total to Date							698	1655	1655
							2176	883744	2176 883744
							2176	884185	2176 884185

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodriguez

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category	and Class
			From To						
2010 6 MAY	B-727-31H	N908JE	PBI PBI	491	2085	LV	1/1	15	SEL ME
13	G-1159B	N909JE	PBI TIST	2086	2087	BH	1/1	24	
13	"	"	TIST PBI	2087	2088	BH	1/1	25	
20	"	"	PBI TEB	2088	2089	LV	1/1	25	
21	"	"	TEB PBI	2089	2090	LV	1/1	24	
31	"	"	PBI TIST	2090	2091	LV	1/1	24	
31 JUN	"	"	TIST PBI	2091	2092	LV	1/1	27	
2	"	"	PBI TEB	2092	2093	LV	1/1	24	
3	"	"	TEB PBI	2093	2094	LV	1/1	27	
9	"	"	PBI TIST	2094	2095	LV	1/1	CONFIDENTIAL DR 000097	
9	"	"	TIST PBI	2095	2096	LV	1/1	25	
10	"	"	PBI TEB	2096	2097	LV	1/1	25	
11	"	"	TEB PBI	2097	2098	LV	1/1	24	
17	"	"	PBI TEB	2098	2099	LV	1/1	25	
18	"	"	TEB PBI	2099	2100	LV	1/1	24	
29 JUL	B-727-200	SIMULATOR	MIA MIA			EX		15	
31	G-1159B	N909JE	PBI TIST	2101		LV	1/1	26	
2	"	"	TIST PBI	2102		LV		26	
15	"	"	PBI TIST	2103		LV	1/1	25	
						LV	1/1	25	
I certify that the statements made by me on this form are true.							Page Total	465	
Pilot's Signature							Amount Forward	105453	331738
David Lodge							Total to Date	106468	331738
									217688
									217688



David Lodge

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	SGL MEL	HG-ZW LONDON									
2010	G-1159B	N909JE	TEB TIST	2130	2130	LV	1/1	35	35										
27	B-127-31H	N908JE	PBI EWR	442	442	LV	3/3	17	17										
29	G-1159B	N909JE	TIST EWR	2131	2131	LV		36	36										
29	"	"	CP5	2132	2132	LV		22	22										
29	"	"	CP5	2133	2133	LV	1/1	20	20										
29	"	"	TEB	2134	2134	LV		40	40										
13	"	"	ABQ	2135	2135	LV	1/1	37	37										
19	"	"	TEB	2136	2136	LV		38	38										
30	"	"	TIST	2137	2137	LV	1/1	40	40										
2011	"	"	TEB	2138	2138	LV		37	37										
JAN 6	"	"	TIST	2139	2139	LV	1/1	29	29										
17	"	"	PBI	2140	2140	LV		24	24										
18	"	"	TEB			LV		20	20										
FEB 2	G-1159A	SEMPULOR	DFW					20	20										
2	"	"	"					20	20										
3	"	"	"					20	20										
3	"	"	"					20	20										
6	G-1159B	N909JE	TEB TIST	2141	2141	LV	1/1	35	35										
10	G-1159B	N530GA	PBI					24	24										
13	G-1159B	N909JE	TEB	2143	2143	LV	1/1	9	9										
I certify that the endorsements made by me on this form are true.																			
Pilot's Signature: <i>David Reddy</i>																			
<table border="1"> <tr> <td>Page Total</td> <td>13/10</td> <td>53</td> </tr> <tr> <td>Amount Forward</td> <td>6931</td> <td>1702</td> </tr> <tr> <td>Total to Date</td> <td>6931</td> <td>1702</td> </tr> </table>										Page Total	13/10	53	Amount Forward	6931	1702	Total to Date	6931	1702	
Page Total	13/10	53																	
Amount Forward	6931	1702																	
Total to Date	6931	1702																	
<table border="1"> <tr> <td>SGL MEL</td> <td>35</td> <td>523</td> </tr> <tr> <td>HG-ZW LONDON</td> <td>35</td> <td>523</td> </tr> </table>										SGL MEL	35	523	HG-ZW LONDON	35	523				
SGL MEL	35	523																	
HG-ZW LONDON	35	523																	



Instructions

Model 1000

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		and Class		
			From	To				ADP/PLN	GLD/DR	SEL	MEL	
2011 Feb 13	G-1159B	N909JE	BGB	PBT	2144		LV	27		SEL	MEL	
16	"	"	PBT	TIST	2145		LV	24				
18	S-76C++	N722JE	TIST	LSJ			LV	3				
19	"	"	LSJ	TFSK			LV	3				
19	"	"	TFSX	LSJ			LV	3				
19	"	"	LSJ	TIST			LV	1				
20	"	"	TIST	LSJ			LV	1				
20	"	"	LSJ	TIST			LV	1				
20	G-1159B	N909JE	TIST	TGB	2146		LV	42				
26	"	"	TGB	ABQ	2147		LV	50				
Mar 1	"	"	ABQ	LGB	2148		LV	1	CONFIDENTIAL DR_000100			
4	"	"	LGB	ABQ	2149		LV	16				
10	"	"	ABQ	CPS	2150		LV	22				
26	"	"	CPS	TGB	2151		LV	18				
26	"	"	TGB	TIST	2152		LV	34				
27	"	"	TIST	MDPC	2153		LV	8				
27	"	"	MDPC	TIST	2154		LV	8				
27	"	"	TIST	MDPC	2155		LV	9				
28	"	"	MDPC	TIST	2156		LV	9				
Page Total							6/5	286			28	
Amount Forward							6944	10754	9	33	1738	2176 B 8578
Total to Date							6540	10783	5	33	1750	2176 B 8666

I certify that the statements made by me on this form are true.

Pilot's Signature: *Daniel Rodriguez*

suojnuipou

Date		Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	SEL	MEL	LP
2011	29	G-1159B	N909JE	TIST	TEB	2157		LV	1	41		41	
30	30	S-76C++	N722JE	TEB	4N1			LV					
30	30	"	"	4N1	TEB			LV					
30	30	"	"	TEB	POU								
13	13	B-727-200	SPMUDJAL	SFB	SFB			20		20		20	
14	14	"	"	"	"			20		20		20	
14	14	"	"	"	"			20		20		20	
26	26	B-727-314	N908JE	PBI	BQK			LV	1	12		12	
30	30	G-1159B	N909JE	TIST	TEB	2159		LV	1	38		38	
14	14	"	"	TEB	LFPB	2160		LV		74		74	
16	16	"	"	LFPB	G00Y	2161		LV	1	63		63	
20	20	"	"	G00Y	GVAC	2162		LV		12		12	
20	20	"	"	GVAC	TIST	2163		LV		64		64	
22	22	"	"	TIST	TEB	2164		LV	1	41		41	
26	26	BHT-407	N491GM	PBI-F45-PBI				LV	1	16		16	
8	8	"	"	PBI-LNA-PBI				LV		14		14	
26	26	G-1159B	N909JE	TIST	TEB	2166		LV	1	40		40	
30	30	"	"	TEB	PBI	2167		LV	5	24		24	
Page Total									54	489		489	
Amount Forward									6510	10783		10783	
Total to Date									6555	10832		10832	
CONFIDENTIAL DR_000101													
2176 8 8606 7													
2176 8 8655 6													

David L. ...



DATE: 2011 JUL 24

TIME: 1400

LOCATION: 1400

PILOT'S SIGNATURE: David Rodriguez

I certify that the statements made by me on this form are true.

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	SEL	MGL	W-130004	Condition
2011 JUL 24	G-1159B	N909JE	PBI TEB	216	216	LV	1/1	24	24	24	W-130004	XC
9	"	"	TEB ASE	216	216	LV		39	39	39		2
9	"	"	ASE ABQ	217	217	LV		12	12	12		3
14	"	"	ABQ BFI	217	217	LV	1/1	20	20	20		1
15	"	"	BFI APC	217	217	LV		16	16	16		2
17	"	"	APC TEB	217	217	LV	1/1	51	51	51		1
19	"	"	TEB TIST	217	217	LV		35	35	35		5
20	"	"	TIST TEB	217	217	LV	1/1	40	40	40		3
25	B-727-200	SPAWATON	MIA MIA			LV		20	20	20		4
25	"	"	"			FE WARM UP		20	20	20		
26	"	"	"			CAPTAIN CHECK REEF PART 125 HARRY BROWN - CAPTAIN IN THE		10	10	10		
26	"	"	"			FE CHECK REEF PART 125 HARRY BROWN - CAPTAIN IN THE		10	10	10		
28	G-1159B	N909JE	TEB PBI	216	216	3 SPT ON JUMP SECTOR		0				
28	"	"	PBI PBI	217	217	3 TANK TAKE OFF + LANDINGS FOR	3/3	11	11	11		1
31	B-727-31H	N908JE	BQK TFS	494	494	LV	1/1	11	11	11		1
31	BHT-407	N491GM	TFS LSJ			LV						8
31	"	"	LSJ LSJ			LV						
31	G-1159B	N909JE	SWF TFS	280	280	LV NM	1/1	39	39	39		9
13	"	"	TEB TFS	218	218	LV	1/1	30	30	30		9
Page Total								9/8	464	464		10
Amount Forward								655	108324	108324		331794
Total to Date								655	108324	108324		331804

CONFIDENTIAL DR 2008102

DATE: 10/1/2011 FROM: [redacted] INSTRUCTIONS: [redacted]

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	SEL MEL	...and Glass	WALLPAPER Co LAMINATES
			From To								
2011 Nov 21	B-727-200	BSNULATOK	MIA			F86 HICK RI DEPARTS 125 LV		10			10
25 Nov	"	"	"			RVSM TEST FLIGHTS		20			20
Dec 1	B-727-31H	N908JE	PBI		445	RVSM TEST FLIGHTS		16			16
3	"	"	PBI		446	DEMO FLIGHT FOR GATIAK AIRPORT	1/1	11			11
13	"	"	PBI		447	MAINTENANCE	1/1	9			9
2012 Jan 8	G-1159B	N909JE	TEB		2193		1/1	9			9
8	"	"	MHT		2194		1/1	61			61
16	"	"	LFPB		2195		1/1	30			30
17	"	"	GMMX		2196		1/1	42			42
18	"	"	DIAP		2197		1/1	36			36
18	"	"	GNAC		2198		1/1	71			71
23	BHT-467	N491GM	LSJ								
24	G-1159B	N909JE	TIST		2199			29			29
Feb 12	G-1159A	SNULATOK	DFW			FMS APPROACHES GAS HOLE, CLOUD WX, SPILLS, NO CLOUDS, HAZARD, WEATHER, ALTITUDE, CHANGING, DESCENT, RTO, EO LATEST, GREEN, COT.		30			30
13	"	"	"					20			20
Mar 6	B-727-31H	N908JE	VQR		448	JFM BORTONOV		5			5
6	"	"	VQR		449			9			9
14	"	"	PBI		449			24			24
17	"	"	JFK		500			75			75
Page Total											3/4
Amount Forward											6911
Total to Date											6552
Total to Date											6556

CONFIDENTIAL DR 009108

Pilot's Signature: David Lodge

I certify that the statements made by me on this form are true.



Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		Mileage	
			From	To					AIRPLANE	GLIDER	SEL	MEL
2012												
MAR 19	B-727-314	N908JE	LFPB	EGHL		501	LAMHAM	1/1	10			10
APR 18	G-1159B	N909JE	TEB	TIST		2207	WARMUP 3 CAPTAIN AND LV ENGINEER HOLDING CAPTAIN PC HOLDING HARRY BROWN-GRIFFIN		37			37
MAY 1	B-727-200	SPHUMTOR	MIA	MIA					40			40
3	G-1159B	N909JE	TIST	PBI		2208			40			40
4	"	"	PBI	TEB		2209			27			27
JUL 8	"	"	TEB	TIST		2212			25			25
20	"	"	TIST	TIST		2213			35			35
21	"	"	TIST	TEB		2214			2			2
26	"	"	TEB	PBI		2215			38			38
30	"	"	PBI	CNW		2216			24			24
30	"	"	CNW	ABQ		2217			24	CONFIDENTIAL DR_000104		24
AUG 15	"	"	ABQ	SFO		2218			15			15
6	"	"	SFO	ABQ		2219			23			23
18	"	"	ABQ	TEB		2220			21			21
22	"	"	TEB	IAD		2221			36			36
22	"	"	IAD	PBI		2222			9			9
26	"	"	PBI	TIST		2223			23			23
SEP 6	"	"	TIST	TEB		2224			26			26
									38			38
									49			49
									33			33
									180			180
									6			6
									33			33
									180			180
									6			6

I certify that the statements made by me on this form are true.

Pilot's Signature: *David Reddy*

Page Total: 11/9  
Amount Forwarded: 6967  
Total to Date: 6565

SUOJHJISUJ

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Manuevers, Endorsements	Number of Landings	Aircraft Category...	SEL	MEL
2012	G-1159B	N909JE	TEB ABQ	2225		LV		41		4
18	"	"	ABQ ONT	2226		LV	1/1	16		1
19	"	"	ONT TEB	2227		LV		48		4
28	"	"	TEB PBI	2228		LV	1/1	25		2
Oct 1	"	"	PBI TIST	2229		LV		26		2
6	"	"	TIST TEB	2230		LV	1/1	37		3
24	B-727-21H	N908JE	EGHL EGSS	562		LV		1		3
28	G-1159B	N909JE	TEB TIST	2231		LV	1/1	39		3
Nov 12	B-727-200	SEMOLAPOR	MID MIA			LV		20		2
12	"	"	" "			LV		2	CONFIDENTIAL DR_000405	2
20	G-1159B	N909JE	TEB PBI	2235		LV		2		2
25	"	"	PBI MDW	2236		LV		28		2
26	"	"	MDW TEB	2237		LV		16		1
Dec 6	B-727-31H	N908JE	EGSS EGSS	503		LV	1/1	1		1
7	"	"	EGSS JFK	504		LV		82		1
14	"	"	JFK TIST	505		LV	1/1	37		1
2013	"	"	TIST PBI	506		LV		28		1
Jan 10	"	"	PBI PBI	1239		LV		29		2
17	G-1159B	N909JE	TEB PBI	2240		LV		27		2
21	"	"	PBI TEB			LV		27		2
Page Total							6/4	558		5
Amount Forward							6418	109128	33	1806
Total to Date							6484	110286	33	1806

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodriguez



Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Measurements, Endorsements	Number of Landings	Aircraft Category...	and Class
			From To						
2013	B-727-31H	N908JE	PBI BQK		587	LV	1/1	1	SEL
7	G-1159A	SEMIANOR	DFW DFW			JOE		2	
13	"	"	"			RENNANKEZ	3/3	2	
14	"	"	"			SOME AS ABOVE		2	
16	G-1159B	N909JE	TEB PBI		2245	TEB	1/1	3	
18	"	"	PBI TEB		2246	TEB		2	
22	"	"	TEB ABQ		2247	TEB	1/1	4	
24	"	"	ABQ LGB		2248	TEB		1	
26	"	"	LGB TEB		2249	TEB		4	
MAR	"	"	TEB PBI		2250	TEB		2	
19	"	"	TIST TEB		2252	TEB	1/1	4	
APR	"	"	TEB TIST		2256	TEB	1/1	3	
5	"	"	TIST TEB		2257	TEB	1/1	3	
21	"	"	TEB ASE		2258	TEB	1/1	4	
25	"	"	ASE ABQ		2259	TEB	1/1	1	
25	"	"	ABQ TUL		2260	TEB	1/1	1	
29	"	"	TUL VNY		2261	TEB		3	
30	"	"	VNY TEB		2262	TEB	1/1	4	
MAY	"	"	TEB TIST		2263	TEB		3	
12	"	"	TIST PBI		2264	TEB	1/1	2	
I certify that the statements made by me on this form are true.							Page Total Amount Forward Total to Date		
Pict's Signature <i>David Rodriguez</i>							6984 6581 6581		
							2176 8 2176 8		

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	SEL	and Class
			From To							
2013 May 15	G-1159B	N909JE	PBI TIST		2265		LV	2 3	MEL	
22	"	"	TIST ISP		2266	ORANGE ROYAL	1/1	3 6		2 3
24	"	"	ISP TEB		2267		LV	8		3 6
24	"	"	TEB TIST		2268		LV	3 7		3
24	"	"	TIST ISP		2269		LV	3 9		3
24	"	"	ISP LFPB		2270		LV	7 0		7
6	"	"	LFPB LPAZ		2271		LV	3 9		3
15	"	"	LPAZ TIST		2272		LV	5 6		5
16	"	"	TIST TEB		2273		LV	3 9		3
24	"	"	TEB TEB		2274	ORANGE ROYAL	1/1	3 8		3
24	"	"	TEB BED		2275		LV	9		3
14	"	"	BED TIST		2276		LV	3	CONFIDENTIAL DR 1000107	3
14	"	"	TIST PBI		2277		LV	2 6		2
25	"	"	PBI TEB		2278		LV	2 5		2
26	"	"	TEB ABQ		2279		LV	4 2		4
Aug 1	"	"	ABQ LAS		2280		1/1	1 3		1
3	"	"	LAS ABQ		2281		1/1	1 4		1
4	"	"	ABQ ASE		2282		1/1	1 1		1
7	"	"	ASE BFI		2283		1/1	2 2		2
7	"	"			2284		1/1	5 8 4		5 8
Page Total							18 11	58 4		
Amount Forward							6 9 8	11 0 8 6 0	3 3	1 8 0 6
Total to Date							7 0 0 9	11 1 4 4 4	3 3	1 8 0 6

I certify that the statements made by me on this form are true.

Pilot's Signature: *David Rodolga*



# EXHIBIT 42

## (Filed Under Seal)





scan



scan0001



scan0003



scan0004



scan0005



scan0006



scan0007



scan0008



scan0009



scan0010



scan0011



scan0012



scan0013



scan0014



scan0015



scan0016



scan0017



scan0018



scan0019

















































# EXHIBIT 43

## (Filed Under Seal)

โรงแรม ดิ.อี.ซี. เมือง จ. เชียงใหม่ 50100 โทร. (063) 281033-8 แฟกซ์ 281044



## ROOM SERVICE

ทะเบียนการค้าเลขที่ 60 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
062	1	923	Nº 32098
DETAILS		AMOUNTS	

Food 820 00  
VAT 24.64  
SERVICE 32.00  
TOTAL 376 64

5 ROOM-B/F

TBL 923/1 CHK 2098 DST 4  
09OCT '02 06:11AM

4 COFFEE/TEA/MILK 320.00 T  
FOOD TOTAL 320.00  
VAT 7% 24.64  
SERVICE 32.00  
TOTAL DUE 376.64

923

923/ROBERTS

HOTEL GUEST 376.64

ACC RECIEVABLE 021009-02-00278

TIN 3 10 1 61770 2

RD# 5014 22 000232

---5 CHECK CLOSED 06:13AM---

02  
001-9-3-24

PAID-CHARGES	
NAME:-	ROOM NO. 923
ADDRESS:-	S.C. NO.
SIGNATURE	



112 ถ. ช้างคด ต.ช้างคด อ.เมือง จ.เชียงใหม่ 50100 โทร. (063) 281033-8 แฟกซ์ 281044



**ROYAL PRINCESS**  
CHIANG MAI

## ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
062	1	923	Nº 32106
DETAILS		AMOUNTS	

Food 110.00  
VAT 8.47  
SERVICE 11.00  
TOTAL 129.47

5 ROOM-B/F

TBL 923/1 CHK 2106 GST 1  
10OCT'02 06:24AM

2 FRENCH FRIES 110.00 T  
FOOD TOTAL 110.00  
VAT 7% 8.47  
SERVICE 11.00  
TOTAL DUE 129.47

923  
923/ROBERTS  
HOTEL GUEST 129.47  
ACC RECIEVABLE 021010-02-00310  
TIN 3 10 1 61770 2  
RID# 5014 22 000232  
—5 CHECK CLOSED 06:25AM—

PAID-CHARGES	
NAME:-	ROOM NO. 923
ADDRESS:-	C. C. NO.
SIGNATURE	

๑. น. ศ.ช้างกลาง อ. เมือง จ. เชียงใหม่ 50100 โทร. (063) 281033-6 แฟกซ์ 281044



## ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
064	1	# 923	Nº 32117
DETAILS		AMOUNTS	

Food @ 120  
 Serv. 10% 13.00  
 Vat. 7% 10.01  
 Tot. 153.01

5 ROOM-B/F

TBL 1/64 CHK 117 GST 1  
 13OCT'02 06:11AM

1 F RICE PORK CHIC	130.00	T
FOOD TOTAL	130.00	
VAT 7%	10.01	
SERVICE	13.00	
TOTAL DUE	153.01	

923

923/ROBERTS

HOTEL GUEST 153.01

ACC RECIEVABLE 021013-02-00435

TIN 3 10 1 61770 2

RD# 5014 22 000232

---5 CHECK CLOSED 06:11AM---

### PAID-CHARGES

NAME :-

ROOM NO.

C. NO.

ADDRESS :-

SIGNATURE

112 อ. ช้างกลาง ต.บ. เมือง อ. เชียงใหม่ 50100 โทร. (063) 281033-6 แฟกซ์ 281044



**ROYAL PRINCESS**  
CHIANG MAI

## ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
064	1	A 923	Nº 32129

DETAILS	AMOUNTS
Food @ 250	5 ROOM-B/F
Serv 10% 25.00	TBL 1/69 CHK 129 GST 1
Vat 7% 19.25	14OCT'02 06:08AM
Tot 294.25	1 FRIED SPRING ROL 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

923

923/ROBERTS

HOTEL GUEST 294.25

ACC RECIEVABLE 021014-02-00484

TIN 3 10 1 61770 2

RD# 5014 22 000232

---5 CHECK CLOSED 06:08AM---

### PAID-CHARGES

NAME :-

ROOM NO.

C. C. NO.

ADDRESS :-

SIGNATURE

112 อ. ช้างกลาง อ.ช้างกลาง อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044



ROYAL PRINCESS  
CHIANG MAI

## Swimming Pool

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
009	1	PLS	Nº 23621
DETAILS		AMOUNTS	

13 POOL-PM.

TBL 1/2 CHK 621 GST 1  
16OCT'02 03:23PM

1 WATER	25.00	T
BEVR. TOTAL	25.00	
VAT 7%	1.93	
SERVICE	2.50	
TOTAL DUE	29.43	

923

923/ROBERTS

HOTEL GUEST 29.43

ACC RECIEVABLE 021016-02-00630

TIN 3 10 1 61770 2

RD# 5014 22 000232

---13 CHECK CLOSED 03:30PM---

PAID-CHARGES	
NAME:-	ROOM NO.
Virginia Roberts	923
ADDRESS:-	C.C. NO.
SIGNATURE	



112 ถ. ช้างกลาง อ. ช้างกลาง อ. เมือง จ. เชียงใหม่ 50100 โทร. (063) 281033-8 แฟกซ์ 281044



## ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
๗๔	๒	๙๒๓	Nº 32143
DETAILS		AMOUNTS	

Food @ 240  
 Serv 10% 24.00  
 Vat 7% 18.48  
 Tot. 282.48

5 ROOM-2/F

TBL 923/1 CHK 143 GST 2  
 16OCT'02 06:19AM

2 FRIED SPRING ROL 240.00 T  
 FOOD TOTAL 240.00  
 VAT 7% 18.48  
 SERVICE 24.00  
 TOTAL DUE 282.48

923

923/ROBERTS

HOTEL GUEST 282.48

ACC RECIEVABLE 021016-02-00597

TIN 3 10 1 61770 2

RD# 5014 22 000232

---5 CHECK CLOSED 06:20AM---

PAID-CHARGES	
NAME :- <i>Virginia Roberts</i>	ROOM NO. <i>09 NO. 5</i>
ADDRESS :-	
SIGNATURE <i>Virginia Roberts</i>	

112 ต. ช้างกลาง อ. ช้างกลาง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044



ROYAL PRINCESS  
CHIANG MAI

## ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
any	3	923	Nº 32147
DETAILS		AMOUNTS	

5 ROOM-B/F

TBL 923/1    CHK 147    GST 3  
16 OCT '02 07:37AM

3 FAMILY BREAKFAST	780.00	Y
FOOD TOTAL	780.00	
VAT 7%	60.06	
SERVICE	78.00	
TOTAL DUE	918.06	

923

923/ROBERTS

HOTEL GUEST 318.06

ACC RECEIVABLE 021016-02-00607

FIN 3 10 1 61770 2

RD# 5014 22 000232

—5 CHECK CLOSED 08:00AM—

PAID-CHARGES	
NAME:— <i>Virginia Roberts</i>	ROOM NO. <i>923</i>
ADDRESS:—	C. C. NO. <i>923</i>
SIGNATURE <i>Robert</i>	

112 ถ. ... ต.ช้างคลาน อ.เมือง จ.เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044



**ROYAL PRINCESS**  
CHIANG MAI

## ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
063	2	923	Nº 32161
DETAILS		AMOUNTS	

5 ROOM-B/F

TBL 923/1 CHK 161 GST 0  
17OCT'02 08:05AM

1 TOST/DNIS/CROST	80.00	T
FOOD TOTAL	80.00	
VAT 7%	5.16	
SERVICE	8.00	
TOTAL DUE	94.16	

923

923/ROBERTS

HOTEL GUEST

94.16

ACC RECIEVABLE 021017-02-00673

TIN 3 10 1 61770 2

RD# 5014 22 000202

----5 CHECK CLOSED 09:15AM----

PAID-CHARGES	
NAME:-	ROOM NO. 923
ADDRESS:-	C. C. NO.
SIGNATURE	

112 0 ม.ค. เชียงดาว อ. เมือง ข. เชียงใหม่ 50100 โทร. (063) 281033-6 แฟกซ์ 281044



## ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
C63	1	923	Nº 32162
DETAILS		AMOUNTS	

ROOM-B/F

FBL 923/1 CHK 162 3ST 0  
17007'02 08:53AM

1 COFF/TEA/MILK	80.00	T
FOOD TOTAL	80.00	
VAT 7%	5.16	
SERVICE	8.00	
TOTAL DUE	94.16	

320  
923/ROBERTS  
HOTEL GUEST 94.16  
ACC RECIEVABLE 021017-02-00679  
TIN 0 10 1 61776 2  
RID# 5014 22 000202  
---5 CHECK CLOSET 09:06AM---

PAID-CHARGES	
NAME: Virginia Roberts	ROOM NO. 923
ADDRESS:-	C. C. NO.
SIGNATURE: [Signature]	



11. ด. ช้างกลาง ด.ช้างกลาง อ. เมือง จ. เชียงใหม่ 50100 โทร. (063) 281033-8 แฟกซ์ 281044



## ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
063	2	923	Nº 32160
DETAILS		AMOUNTS	

C ROOM-B/F

TBL 923/1 CHK 2160 GST 2  
17OCT'02 07:47AM

1 FRESH FRUIT	80.00	T
2 OR GR TO JUICE	180.00	T
FOOD TOTAL	260.00	
VAT 7%	20.02	
SERVICE	26.00	
TOTAL DUE	306.02	

923

923/ROBERTS

HOTEL GUEST 306.02

ACC RECEIVABLE 01JUL17-02-00670

TIN 3 10 1 61770 2

RD# 5014 22 001202

---5 CHECK CLOSED 18:00AM---

PAID-CHARGES	
NAME :- <i>Virginia Roberts</i>	ROOM NO. 923
ADDRESS :-	C. C. NO.
SIGNATURE <i>Virginia Roberts</i>	

112 ถ. ช้างกลาง ต.ช้างกลาง อ. เมือง จ. เชียงใหม่ 50100 โทร. (063) 281033-8 แฟกซ์ 281044



## ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
C62	2	923	Nº 32171
DETAILS		AMOUNTS	

ROOM-B-7

923/1 CHK 171 180LT 02 19:38:00

2 COFF/TEA/MILK	100.00	1
1 MILK SHAKE	30.00	1
FOOD TOTAL	130.00	
VAT 7%	19.25	
SERVICE	25.00	
TOTAL DUE	294.25	

923

923/ROBERTS

HOTEL GUEST 294.25

ACC RECEIVABLE 02018-02-00756

TIN 3 10 1 61779 1

5014 22 90209

CHECK CLOSED 18:52AM

## PAID-CHARGES

NAME:-

ROOM NO.

C. C. NO.

ADDRESS:-

SIGNATURE

สถาน ค.ช้างควาน อ. เมือง ข. เชียงใหม่ 50100 โทร. (063) 281033-6 แฟกซ์ 281044



## ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
072	2	923	Nº 32172
DETAILS		AMOUNTS	

ROOM-512  
 Fol. 923/1 CHK 172  
 1800T 02 08:56PM  
 12 POST/DNIS/PROPOSN 188.32  
 FOOD TOTAL 188.30  
 VMT 7% 12.32  
 SERVICE 06.00  
 TOTAL DUE 188.32  
 HOTEL GUEST 188.32  
 NO RECEIPTABLE 321018-02-90752  
 TIN 2 40 1 61770 2  
 FID 5014 32 0 1232  
 ---5 CHECK CLOSED 19:04PM---

PAID--CHARGES	
NAME: Robert	ROOM NO. 923
ADDRESS:--	C. C. NO.
SIGNATURE	

112 ถ. ช้างกลาง อ.ช้างกลาง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044



*Garden*  
C A F E

ทะเบียนการค้าเลขที่ 60 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
K. 13	1	9	Nº 263581
DETAILS		AMOUNTS	

C.B.F.

TBL 9/4 CHK 532 GST 1  
18OCT'02 08:27AM

C.B.F. 300.00  
FOOD TOTAL 300.00  
VAT 7% 15.40  
SERVICE 20.00  
TOTAL DUE 335.40

705

705-000000  
HOTEL GUEST 335.40  
ACC RECEIVABLE 021018-02-00755  
TIN 3 10 1 61770 2  
\*DN 501- 22 000232  
----1 CHECK CLOSED 18:50AM----

PAID-CHARGES	
NAME :- DAG RANGNES	ROOM NO. 705
ADDRESS :-	C. C. NO.
SIGNATURE	Dag Ranges



112 ต. ช้างกลาง อ. ช้างกลาง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044



ROYAL PRINCESS  
CHIANG MAI

# Swimming Pool

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
006	2	Pool	Nº 23629
DETAILS		AMOUNTS	

12 POOL-AM.

TBL 1/69 CHK 629 GST 2  
17OCT'02 12:06PM

1 SINGHA BEER -S	110.00	T
1 SOFT DRINKS	50.00	T
BEVR. TOTAL	160.00	
VAT 7%	12.32	
SERVICE	16.00	
TOTAL DUE	188.32	

907

907/BROWNLIE-MCI

HOTEL GUEST 188.32

ACC RECEIVABLE 021017-02-00695

TIN 3 10 1 51770 2

RD# 5014 22 000232

---12 CHECK CLOSET 12:14PM---

PAID-CHARGES	
NAME:-	ROOM NO. 907
M. MCINTYRE	C. C. NO.
ADDRESS:-	
SIGNATURE M McIntyre	

## ซัก-รีด/LAUNDRY

ใบที่ BK No. 034

เลขที่, 01699

จำนวน ที่นับ Office Count	จำนวน ที่นับ Office Count	GENTLEMEN	จำนวน Amount	จำนวน ที่นับ Guest Count	จำนวน ที่นับ Office Count	LADIES	จำนวน Amount
	0	เสื้อแขนสั้น/Short-sleeved shirts	70			ชุดนอน/Dress	130
	0	เสื้อแขนยาว/Long-sleeved shirts	80			เสื้อแขน/Blouse	100
	0	เสื้อแขนสั้น/Short-sleeved shirts	60		1	เสื้อแขน/Blouse	70
		กางเกง/Trousers	90			กางเกง/Blouse	120
		ผ้าเช็ดตัว/Handkerchief	20			กางเกง/Blouse	100
	5	ถุงเท้า 1 คู่/Socks PR	25		5	กางเกง/Blouse	90
	3	กางเกง/Shorts	60			กางเกง/Blouse	20
	3	เสื้อแขนสั้น/Under shirt	30			ชุดนอน/Pyjamas	90
	1	กางเกง/Under shirt	30			เสื้อแขน/Blouse	90
		เสื้อแขนยาว/Coat (cotton)	100			กางเกง/Blouse	45
		ชุดนอน/Pyjamas	90		12	กางเกง/Blouse	40
		ชุดนอน/Safari Suit	150			กางเกง/Blouse	60
		อื่นๆ/Other				กางเกง/Blouse	

☒ บริการปกติ  
Regular Service  
☐ บริการด่วน (เพิ่มค่าบริการ 50%)  
Express (50% Surcharge)  
☐ ถัดไป/Next day  
To Hold

เลือกที่จะคืน  
Shirts to be returned  
☒ พับ  
Folded  
☐ แขวน  
Hanger

รวมรวม  
Total Amount  
10% ค่าบริการ  
10% Service Charge  
7% ภาษี  
7% Government Tax  
รวมรวมรวมรวม  
Total Amount

ชื่อ/Name Margaret Roberts  
หมายเลขห้อง/Room No. 923  
วันที่/Date 10-3-02  
วันและเวลาที่ท่านเดินทาง/Your Departure Date & Time 11/10/95

คำแนะนำ/Remarks: Be Delicate w/ lace pants & underwear  
Laundry Mark: UNDERWEAR

PINK = CASHIER, YELLOW = ACCOUNT, WHITE = GUEST











บริษัท รอยัล ปริ๊นเซส จำกัด (มหาชน)  
 สาขาโรงแรมรอยัล ปริ๊นเซส เชียงใหม่  
 112 ถ.ช้างคลาน ต.ช้างคลาน  
 อ.เมือง จ.เชียงใหม่



เลขประจำตัวผู้เสียภาษี 5 10 101770 2

ROYAL PRINCESS  
CHIANG MAI

NO. 41943

MINI BAR LIST

BEVERAGES AVAILABLE IN YOUR REFRIGERATOR 185VN

NAME ..... ROOM NO. 923 DATE 17-10-85

PAR STOCK	CONTENTS	UNIT PRICE	CONSUMPTION	TOTAL BAHT
2	Singha Beer (Small)	100		
2	Heineken Beer	110	1	110
2	Soda Water	50		
1	Coca-Cola	50	1	50
2	Mineral Water	60		
1	Brandy V.S.O.P. 20 cl.	550		
1	Scotch Whisky 20 cl.	400		
1	Thai Whisky	130		
1	Gin 20 cl.	400		
1	Vodka 20 cl.	400		
4	Chocolate Bar	60		
1	Potatoes Snack	40		
2	Singha Water	Complimentary		
		923 TOTAL		160

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 .....

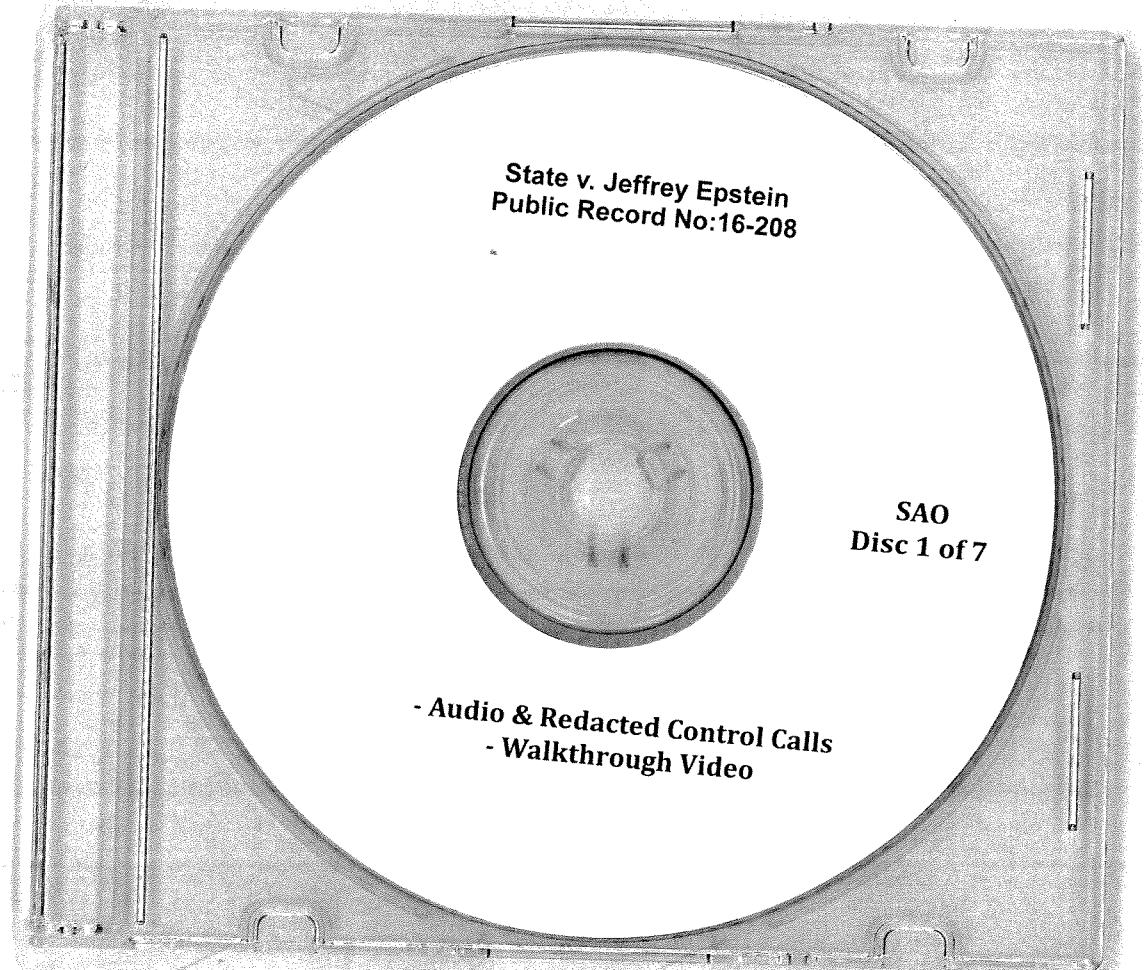
Refilled by ..... Front Office Cashier

GIUFFRE007432  
CONFIDENTIAL

# EXHIBIT 44

## (Filed Under Seal)





# EXHIBIT 45

## (Filed Under Seal)

*Amended*

## VEHICLES


<b>Mercedes Benz 600</b> 2001 Black Licence: EO3PRU → Lic: U90-BQL <i>Gone to NYC 1998</i>	(561) 309-6415 Rear (561) 379-9390 Front <i>(Taken by Dog)</i>	Mercedes Benz of Palm Beach 4000 Okeechobee Boulevard West Palm Beach, FL 33409 Att: Shawn Adison Tel: (561) 689-6363
<b>Mercedes Benz 600</b> 1997 Black Licence: G14KCT	(561) 758-1672 Rear (561) 818-8867 Front	
<b>Mercedes Benz 600 Conv</b> 1998 Silver Licence: RAS85L <i>Gone</i>	(561) 346-7141	<i>Paint WORK &amp; BODY SHOP</i> <i>COACH WORK</i> <i>contact Dominique</i> <div style="background-color: black; width: 100px; height: 15px;"></div>
<b>Suburban</b> 2001 Black Licence: WGE53R <i>Gone to 20110</i>	(561) 371-1686	Roger Dean Chevrolet 2235 Okeechobee Boulevard West Palm Beach, FL 33409 Tel: (561) 683-8100
<b>Crysler Mini Van</b> 1996 White Licence: WGE52R <i>Gone</i>	(561) 308-5700	Nestor Auto Repairs 2600 Florida Avenue West Palm Beach, FL 33401 Tel: (561) 835-0809
<b>Cobra Grand</b> 1993 Green C97CRJ <i>Kenny's Garage</i>		Nestor Auto Repairs 2600 Florida Avenue West Palm Beach, FL 33401 Tel: (561) 835-0809
<b>Volvo</b> 1998 Gold Mrs Epstein	(561) 686-3707	Volvo Palm Beach 5544 Okeechobee Boulevard West Palm Beach, FL 33417 Tel: (561) 471-7600
<b>Oil Well</b>	900 Southern Boulevard West Palm Beach, FL 33405 Tel: (561) 835-9374	Oil change every 3 000 miles

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



<b>Muvico Parisian</b>	City Place 545 Hibiscus Street West Palm Beach, FL 33401  Tel: (561) 833-0400	
------------------------	---	--

**GROCERY STORES**

<b>Bishop Water Co</b>	Tel: (561) 582-1367 <i>Sharon</i>	<i>Super</i> Bottled water (large and small)
<b>Carmine Giardini's</b>	2401 PGA Boulevard, Suite 172 Palm Beach Gardens, FL 33410  Tel: (561) 775-0105 <del>Ext (561) 775-9233</del>	Fish, meat, gourmet foods 
<b>C'est Si Bon</b>	280 Sunset Avenue Palm Beach, FL 33480  Tel: (561) 659-6503	Gourmet foods
<b>Publix Super Market</b>	265 Sunset Avenue Palm Beach, FL 33480  Tel: (561) 655-4120	General, cleaning, toiletries
<b>Wild Oats</b>	7735 South Dixie Highway West Palm Beach, FL 33405  Tel: (561) 585-8800	Health Foods


**HEALTH & BEAUTY**

<b>Pharmacy</b>	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	



**UTILITIES**

<b>Water</b>	City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461  <b>Tel: (561) 965-5770</b>	Water shut-off for entire property is located next to the mailbox on the sidewalk.
<b>Electricity</b>	Florida Power and Light General Mailing Facility Miami, FL 33188-0001  <b>Tel: (561) 697-8000</b>	
<b>Gas</b>	Florida Gas Company 401 South Dixie Highway West Palm Beach, FL 33401  <b>Tel: (561) 832-0872</b>	
<b>Sewer</b>	City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461  <b>Tel: (561) 965-5770</b>	
<b>Trash Removal</b>	City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461  <b>Tel: (561) 965-5770</b> <i>Wester Park</i> <i>(561) 965 4022 Trash Removal</i>	Daily (Monday -Friday) <i>Recycles (Thurs bet Noon)</i>
<b>Telephone</b>	ETC 2921 N Australian Avenue West Palm Beach, FL 33407  <b>Tel: (561) 881-8118</b>	
	Bell South  <b>Tel: (561) 780-2611</b>	


<b>Plumber</b> <i>General PLUMBING</i> <i>561-585-2591</i>	<b>Foster Plumbing</b> 2800 Westgate Avenue West Palm Beach, FL 33409 Tel: (561) 686-1721	General plumbing repairs
	<b>Roto Rooter</b> 6600 NW 12th Avenue, Suite 213 Fort Lauderdale, FL 33309 Tel: (561) 832-1495	Blocked drains
<b>Pool</b>	<b>Hackl Pools</b> 1331 Central Terrace Lake Worth, FL 33460 Tel: (561) 588-7493 <i>Valerie</i>	Monday and Thursday at 10:30am Clean pool, filter, add  <i>(Michelle)</i>
<b>Tree Trimming</b>	<b>County Wide Tree Service</b> Tel: (561) 371-5786	First Monday in May and November

**STORAGE**

<b>Storage USA</b>	5580 Okeechobee Boulevard West Palm Beach, FL 33417 Tel: (561) 683-9955	10 ft x 20 ft unit available
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**VEHICLES**

<b>Car Detailing</b>	<del>           Palm Beach Wash &amp; Auto Detail            1220 N. Dixie Highway            (at Amoco Gas)            Tel: (561) 835-8748         </del> <i>James?</i>	
----------------------	--	--

*George*  
*Clean Car Services*  
  
*1246 W 1st Ave*  
*Boynton Beach FL*  
*33426*

*G. G.*  
*724 SW 1st Ave.*  
*Boynton Beach, FL*  
*3*



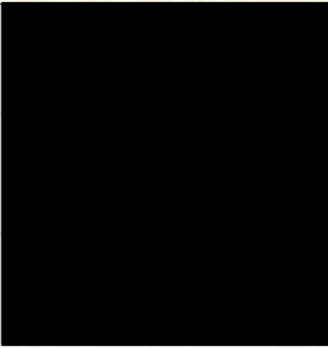
## MAIL &amp; DELIVERY SERVICES

<b>FedEx</b>	<b>1-800-463-3339</b>	Account No: [REDACTED] Drop-off box is next to Palm Beach National Bank on Worth Avenue
<b>Post Office</b>	401 South County Road West Palm Beach, FL  <b>Tel: (561) 832-0697</b>	

## MAINTENANCE

<b>Air Conditioning</b>	Cassidy Air Conditioning 501 Fern Street West Palm Beach, FL 33401 <i>- Kathy</i> <b>Tel: (561) 833-6331</b> <i>- Kary</i>	Monthly service contract First Monday of every month <i>etc. Payment</i> <i>- Joe (Technician)</i> <i>* Bob (Filter Service)</i>
<b>Awnings</b>	American Awning Company 537 Pine Terrace West Palm Beach, FL 33405  <b>Tel: (561) 832-7123</b>	<i>Can?</i>
<b>Cable Service</b>	Adelphia Cable 1401 North Point Parkway West Palm Beach, FL 33407  <b>Tel: (561) 478-8300</b>	<i>Cable</i>
<b>Carpenter</b>	<b>Tel:</b> [REDACTED]	Erwin <i>Ray</i> <i>Can</i>
<b>Carpet Cleaners</b> <i>Mary Sue</i>	Stanley Steamers <b>Tel: (561) 586-5700</b>	Wall to wall <i>2-Cable</i>
	Merry Rugs <b>Tel: (561) 588-8588</b>	Loose rugs
<b>Computers</b>	<del>Bloomberg 499 Park Avenue New York, NY 10022  <b>Tel: (212) 318-2100</b></del>	Palm Beach consultants: Chad Bonta Peter Kapopoulos <i>Changed</i> <b>Tel: (</b> [REDACTED] <b>)</b>

## TRAVEL

Pilots	Larry Visoski ✓	
	Dave Rodgers	
	Larry Morrison	
Mr Epstein's planes	Jet Aviation	<p>(561) 233-7241</p> <p>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            They will tag and pull car to plane upon arrival</p>
Ms Maxwell's plane	Raytheon <i>Changed to:</i> <i>Fly Options</i>	<p>1-888-835-9782</p> <p>Contract No: Air 4            Tail # ...TA <i>970 QJ</i>            Always a Beech Jet or Hawker</p>
Commercial Airlines	Air France American British Airways Continental Delta South African Airways United US Air	<p>1-800-237-2747</p> <p>1-800-433-7300</p> <p>1-800-247-9297</p> <p>1-800-525-0280</p> <p>1-800-221-1212</p> <p>1-800-722-9675</p> <p>1-800-241-6522</p> <p>1-800-428-4322</p>

*- Carlos Ruiz Handyman (561)*



→ Colonial Bank /worth Ave.  
 - Ben Lehn  
 - Leonor

**BANKING**

<b>Household Banking Account</b>	Palm Beach National Bank 125 Worth Avenue Palm Beach, FL 33480  Tel: (561) 653-5594	Account No: [REDACTED] Send to Eric Gany for reconciliation \$1,000 Petty Cash Float
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**BICYCLES**

<b>Bicycles</b>	Palm Beach Bicycle Trail Shop 223 Sunrise Avenue Palm Beach, FL 33480  Tel: (561) 659-4583	Mongoose Crossway 450 Raleigh Aluminium 300 Mercedes Benz Signal Sports Bike Schwinn World Huffy Santa Fe Raleigh Sport Scott Boston
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**BOOKSTORES**

<b>Newspapers</b>	Publix Super Market 265 Sunset Avenue Palm Beach, FL 33480  Tel: (561) 655-4120	
<b>Magazines</b>	Main Street News 255 Royal Poinciana Way Palm Beach, FL 33480  Tel: (561) 833-4027	

**CLEANING SERVICE**

<b>Francis Peadon House Cleaning Services</b>	[REDACTED] cell. 1. at 2.	Every Tuesday and Wednesday 8:00am - 4:00pm (Francis and Pastora Peadon)
---	---------------------------------	--

**ENTERTAINMENT**

<b>The Breakers</b>	One South County Road Palm Beach, FL 33480  Tel: (561) 655-6611	Renew car park stickers every September
<b>Comedy Corner</b>	2000 South Dixie Highway West Palm Beach, FL 33401  Tel: (561) 833-1812	
<b>The Mar-a-Lago Club</b>	1100 South Ocean Boulevard Palm Beach, FL 33480  Tel: (561) 832-2600	

Sem Co. System (561) 715-4832 Sam

Electrician	Energy Efficient Electric Tel: (561) 655-7211	Changed
Exterminator	Palm Beach Exterminating Tel: (561) 689-0808	Contact is Ken First Monday of every month at 10:30am Also use for termite tent
Garden Service	Alan Stopek Efflorescence [REDACTED] Trace Wellington, FL 33414 [REDACTED]	
	Jerome Pierre [REDACTED]	Part-time help. Billed through Alan Stopek. In residence: Daily from 6.30am Not in residence: Mon - Fri from 2pm - 5pm Also maintains Mrs Epstein's property on Saturday mornings.
Garage Doors	The Doorsmith 4160 NW First Avenue Boca Raton, FL 33431 Tel: (561) 391-7768	
Gates	Reich Metal Fabricators / Tom Tel: (561) 585-3173 John	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
Irrigation	Dolphin Sprinkler Inc Tel: (561) 844-8082 Janet	Alan Bontz
Landscape Spraying	Academy Services Tel: (561) 478-4629	Arrange through Alan Stopek
Locksmith	Wilson Rowan Locksmiths 625 South Dixie Highway West Palm Beach, FL 33401 Tel: (561) 655-3637	
Painter	[REDACTED]	Bill Changed

02/11/2015

Page 2303

Public Records Request No. 16-268

GIUFFRE007841



Suburb (Sunrock)

Senh

\* Adrian

Aden  
\* Stopok

- Boll

- Benjamin  
(State Dept)

\* - Bruno

- Dave (Pilot)

- David (Cool)

- E Mollica

\* George Heertens A.

- Christine

- Nedie

- Helen

- Omar

- Tom Lee (Koron Models)

- Jorge Heertens

P.B. Still

- Larry (Pilot)

P.B. Harris

- Lanny (Electric)

P.B. Fox

- Miguel

P.B. (300)

Mike Heertens

Mom's

1.

2.

3.

Senh

Address / Telephone Sheet

Sarah's E Mail!

# 358 El Brillo Way, Palm Beach Fl, 33480

Name	Address	Telephone/Fax
------	---------	---------------

Mr. Jeffrey Epstein (NYSG LLC) Office  
457, Madison Avenue 4<sup>th</sup> Floor  
New York, NY 10021.

Email

Ms. Ghislaine Maxwell

Email

Accountants

Eric Gany

EMAD HANNA (St. Rep.)

Email

Email

Bella Klein-Accountants

Email

(Patty Cash Rep.)

Assistants

Leslie Groff (JE Sec)

Email

Cecelia

Helan Kim

Email

~~Michelle Campos~~

Email

Jenn Doyle

Property

Keith Blumberg

Email

Engineer

Richard Barnett

DOUG

SCHOETTLE

Computers

Mark Lumberg

Residences of Mr. Jeffrey Epstein

9 East 71<sup>st</sup> Street,  
New York NY 10021

Mr. Jeffrey Epstein

Ms. Ghislaine Maxwell

Staff

House Manager Jojo

House Manger Lynn

Staff Phone

Chef Brent Tindall



Home Depot  
478.0783 Mon

Palm Beach ContractorsGeneral Plumbing

Customer Service representative Amy 561 585 2591

Electrical

Reel Power Inc Lenny (electrician) 561 706 0827

Gates

Samco Systems Sam (owner) 561 719 4832

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 Keith Kelly

Telephones

Southern Bell (repairs) 561 780 2355

Internal Phone system ( NEC)

Repair and Programming 561 881 8118

Alarm System

Benham Industries Inc Keith 854 491 4112

Locksmith

Wilson & Rowan 561 655 3637

A/C Maintenance

John C Cassidy 24 hr service

Handyman

Carlos (carpenter) 404.494.4444

Landscape

Alan Stopeck

Pest Control

Palm Beach Exterminator Kim 561 844 8082

Irrigation

Dolphin Sprinkle 561 478 4696

Pool Heating

National Pool Service When needed 561 585 8866

Pool Maintenance

Hack Pool Service Monday/ Thursday 561 588 7493

Tree Trimming

Country Wide Trees Twice, summer/winter 561 371 5786

Carpet Cleaners

Stanley Steamers wall to wall 561 586 5700

Merry Rug area rug 561 588 8588

Alarm - 954.

POST OFFICE

- 1.800.275.8777  
561.659.0261Wed 1  
8-12Cable

Adelphia cable

Cable TV

561 468 8300

697.8473

Bottled Water.

Bishop water company

Avion water

561582 1367

1.888.683.1000

Upholsterer

Frank Jennes

Gas

Gas Energy Inc (Joe Di Giovanni) all gas repairs)

561 963 0505

Laundry equipment

May Tag

1800 622 4729

Painter

Sam

Contact Lenny

Storage

Storage USA

561 683 5835

5580, Okeechobee Blvd

Unit 6218

Grocery & General Household itemsGeneral Grocery

Publix

265, Sunset Ave

561 655 4120

Gourmet food

C' est si bon

289, Sunset Blvd

561 659 6503

Carmines

2401 PGA Blvd Take 95 North to PGA Blvd

561 775 9233

Too Jays

Gravelox/ Nova sliced salmon

561 655 6545

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

528, Clematis Street

Newspapers

Main Street News

255, Royal Poinciana Way

561 833 4027

Post Office

401, South County Road,

561 832 0697

Car Detailing

George

Taxi Service/Limo

Dan Tischen

FedEx

# 114420816 (Monday &amp; 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 SHOOTERS

561-712-9882



Marina

\* INTEL \*

\*

From Sgt Dan Szareswski

w/F >

per Curtis



could talk w/ EPSTEIN KNOWS  
him WELL. INFO passed on to Capt.

~~CONFIDENTIAL~~

- [REDACTED]
- 12:50pm [REDACTED]  
[REDACTED] -wants to talk to you @ something private
- [REDACTED] Friday
- 6/19 7:15pm [REDACTED]
- 6/17 5:55pm [REDACTED]
- 12:30 [REDACTED] has a Q For you - can you please call her  
[REDACTED]
- 6/19 1020pm Jean Luc
- Signed Neiman Marcus 6/9/05 \$33.02 Amex [REDACTED]
- [REDACTED] will be here @ 6:30am 01/06
- 6/19/05 1:00pm Jean Luc
- Four season [REDACTED] waitt
- 6/18/05 6:40 [REDACTED]
- 914 [REDACTED]
- 6/19/05 [REDACTED]
- TONYAworld.com

Trannis



**EXHIBIT 46**  
**(Filed Under Seal)**

SSA-1826

ITEMIZED STATEMENT OF EARNINGS

SOCIAL SECURITY ADMINISTRATION  
EARNINGS RECORD INFORMATION

Date: 10/25/2016

Our records show the amount of earnings reported, not the amount of Social Security taxes that were paid.

Wages were first covered under Social Security in 1937. Therefore, 1937 is the first year for which earnings may be shown on our records. Employers were required to report earnings semi-annually in 1937, and on a quarterly basis for the years from 1938 through 1977. Beginning with 1978, employers are required to report earnings annually.

Our records do not show the exact date of employment (month and day) because we do not need this information to figure Social Security benefits. Employers do not give us this information.

Each year, there is a maximum amount of earnings that is subject to Social Security taxes and is used to compute benefits. If a person earns more than this maximum amount, the earnings statement will usually show the maximum rather than the total earnings. Maximum benefits can be found on the SSA website.  
<http://www.ssa.gov/OACT/COLA/cbb.html>

Beginning in 1951, self-employed persons could also receive Social Security credit for their work. The maximum amounts of self-employment earnings that are subject to Social Security taxes and are used to compute benefits can also be found on the SSA website.  
<http://www.ssa.gov/OACT/COLA/cbb.html>

If you have any questions, you should call, write, or visit any Social Security office. If you visit or call, please bring this letter. It will help us answer questions. The toll free number to call is 1-800-772-1213 (for the deaf or hard of hearing, call our TTY number, 1-800-325-0778).

GIUFFRE009176

CONFIDENTIAL

SSA-1826

ITEMIZED STATEMENT OF EARNINGS  
 \* \* \*      FOR SSN XXX-XX-[REDACTED]      \* \* \*

FROM: SOCIAL SECURITY ADMINISTRATION  
 OFFICE OF CENTRAL OPERATIONS  
 6100 WABASH AVENUE  
 BALTIMORE MARYLAND 21215

NUMBER HOLDER NAME: VIRGINIA GIUFFRE  
 YEARS REQUESTED: 1998 THRU 2002; 2013 THRU 2015

BOIES SCHILLER AND FLEXNER  
 401 E LAS OLAS BLVD STE 1200  
 FORT LAUDERDALE FL 33301

EMPLOYER NUMBER: [REDACTED]  
 KFC USA INC  
 % PAYROLL DEPT  
 5200 COMMERCE CROSSING DR  
 LOUISVILLE KY 40229-2182

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					\$140.70

EMPLOYER NUMBER: [REDACTED]  
 PUBLIX SUPER MARKETS INC  
 PO BOX 32018  
 LAKELAND FL 33802-2018

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					\$216.69

EMPLOYER NUMBER: [REDACTED]  
 ASCENSION CHILD CARE CENTER  
 ASCENSION PEACE CHILD CARE CENTER  
 2701 N STATE ROAD 7  
 LAUD LAKES FL 33313-2731

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					\$216.97

SSA-1826

## ITEMIZED STATEMENT OF EARNINGS

\* \* \* FOR SSN [REDACTED] \* \* \*

EMPLOYER NUMBER: [REDACTED]  
 AVICULTURAL BREEDING & RESEARCH  
 CENTER  
 % ERNEST LAKS  
 14201 125TH AVE N  
 WEST PALM BCH FL 33418-7945

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$99.48

EMPLOYER NUMBER: [REDACTED]  
 SOUTHEAST EMPLOYEE MANAGEMENT  
 COMPANY  
 2559 PALM DEER DR  
 LOXAHATCHEE FL 33470-2563

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$3,212.44

EMPLOYER NUMBER: [REDACTED]  
 MAR-A-LAGO CLUB LLC  
 TRUMP DONALD J GEN PTR  
 % TRUMP ORGANIZATION  
 1100 S OCEAN BLVD  
 PALM BEACH FL 33480-5004

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$1,866.50

EMPLOYER NUMBER: [REDACTED]  
 OASIS OUTSOURCING VI INC  
 2054 VISTA PKWY STE 300  
 WEST PALM BCH FL 33411-6742

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$2,037.60

EMPLOYER NUMBER: [REDACTED]  
 NEIMAN-MARCUS GROUP LLC  
 % NEIMAN MARCUS GROUP LTD SOLE MBR  
 1201 ELM ST  
 DALLAS TX 75270-2102

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$1,440.79



SSA-1826

## ITEMIZED STATEMENT OF EARNINGS

\* \* \* FOR SSN [REDACTED] \* \* \*

EMPLOYER NUMBER: [REDACTED]  
 MANNINOS INC  
 MANNINOS RESTAURANT  
 12793 B W FOREST HILL BLVD  
 WEST PALM BEACH FL 33414-4749

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2001					\$212.00

EMPLOYER NUMBER: [REDACTED]  
 CCI OF ROYAL PALM INC  
 % ROBERT FURR TTEE  
 2255 GLADES RD STE 337-W  
 BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$403.64

EMPLOYER NUMBER: [REDACTED]  
 ROADHOUSE GRILL INC  
 ROBERT C FURR TTEE IN BANKRUPTCY  
 2255 GLADES RD STE 337W  
 BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$1,247.90

EMPLOYER NUMBER: [REDACTED]  
 MARC PINKWASSER DVM PA  
 13860 WELLINGTON TRCE STE 31  
 WELLINGTON FL 33414-8541

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$1,561.75

EMPLOYER NUMBER: [REDACTED]  
 GREAT OUTDOORS PREMIER RV-GOLF  
 RESORT COMMUNITY SVC ASSOC INC  
 145 PLANTATION DR  
 TITUSVILLE FL 32780-2528

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2014					\$171.83

# EXHIBIT 47

## (Filed Under Seal)

Monday, November 7, 2016  
 1 Quicken Data - All Accounts

Page: 1

## QuickReport by Description

8/12/69 through 1/29/03

Date	Account	Num	Payee	Memo	Category	C l r
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		<i>split</i>	R
5/6/02	Courtyard Animal Hospital	1522	VOIDvirginia Roberts			R
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		<i>split</i>	R
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		<i>split</i>	R
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		<i>split</i>	R

Total 8/12/69 - 1/29/03

Total Inflows  
 Total Outflows

Net Total

# EXHIBIT 48

## (Filed Under Seal)



----- 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 Derschwitz 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)

## TERMINATIONS

LAST NAME	FIRST NAME	
Rinker	Ross	Box #7
Rivera	Pablo	Box #3
Rivera	Eduardo	Box #2
Rivero	Alicia	Box #7
Robbins	Jody	Box #4
Roberts	Virginia	Box #4
Roberts	Walter	Box #4
Roberts	Diane	Box #3
Robsham	Lydie	Box #7
Rodriguez	Francisco	Box #4
Rodriguez	Abel	Box #3
Rodriguez	Kenia	Box #3
Rodriguez	Aristalia	Box #2
Rogers	Howard	Box #2
Romeus	Melege	Box #2
Rony	Jean	Box #2
Roqueta	Maria	Box #2
Rose	Cheryl	Box #2
Rosenberg	Bradley	Box #2
Rosier	Sandra	Box #2
Rotchford	Bernadette	Box #4
Rubio	Pascual	Box #2
Rueda	Maria	Box #4
Ruiz	Juan	Box #2
Russeau	Heidi	Box #4
Russell	Kathryn	Box #4
Russotto	Vincent	Box #7
Ryan	Megan	Box #2
Ryan	Michael	Box #7
Saint Gerard	Manes	Box #7
Saint Surin	Jacquest	Box #2
Salloum	Adib	Box #2
Salman	David	Box #2
Salvador	Marian	Box #2
Sanford	Kevin	Box #5
Santos	Elimos	Box #2
Sasaki	Shoko	Box #7
Saunders	Sarah	Box #2
Savage	Angelia	Box #5
Savoie	Terry	Box #2
Scanlan	Peter	Box #5
Schlechter	Melissa	Box #5
Schmantowsky	Craig	Box #2
Schoonover	Richard	Box #2
Schroeder	Glenn	Box #5
Schumacher	Patricia	Box #2
Schwab	Emily	Box #2
Scotland	Jaycen	Box #7
Scott	Cecelia	Box #2

## TERMINATIONS

LAST NAME	FIRST NAME	
Vasquez	Sosmar	Box #5
Vasquez	Christian	Box #2
Vaughn	Matthew	Box #2
Velasquez	Rodolfo	Box #2
Vidalis	Chantal	Box #2
Voluck	Justin	Box #2
Vyskrebentsev	Aleksey	Box #5
Wahl	Steven	Box #5
Walker	Sylvia	Box #7
Walkowiak	Toni	Box #7
Wallace	Philip	Box #2
Ward	Terry	Box #5
Webb	Jacob	Box #7
Weber	Ronald	Box #2
Weidner	James	Box #7
Weisman	Brian	Box #2
Wentworth	Gayle	Box #2
Weslowski	Elaine	Box #2
White	Scott	Box #5
Whitley	Deborah	Box #7
Whitney	Moriah	Box #7
Whittle	Tamara	Box #2
Wilburn	Jennifer	Box #2
Williams	Arhon	Box #2
Williams	Gretchen	Box #2
Williams	Jacqueline	Box #2
Williams	Ellen	Box #7
Williams	Kristin	Box #7
Willoughby	William	Box #2
Willson	Howard	Box #5
Willson	Joseph	Box #2
Woolf	Elena	Box #2
Wynn	Beverly	Box #2
Yancey	Kathryn	Box #2
Yancey	Scott	Box #7
Yeskey	Dean Martin	Box #5
Young	Todd	Box #2
Zervoulis	Matthew	Box #2
Zivkovic	Milo	Box #2
Zorn	Christopher	Box #7
Zwick	Danielle	Box #2

Box #1                    1998 terms  
 Box #2                    1998 & 1999 terms  
 Box #3                    1999 terms  
 Box #4                    2000 terms  
 Box #5                    2000 terms  
 Box #6                    2001 terms



# EXHIBIT 50

## (Filed Under Seal)

# EXHIBIT12

**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 JOINDER IN ACTION**

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

**FACTUAL BACKGROUND**

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

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

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

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

Jane Doe #3's Circumstances



As with Jane Doe #1 and Jane Doe #2, Jane Doe #3 was repeatedly sexually abused by

Epstein. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Author	Year	Journal	Volume	Issue	Page	DOI	URL
Wang, Y., & Zhang, J.	2018	Journal of Management Science	42	1	1-12	10.11818/j.issn.1000-7555.2018.01.001	http://www.cnki.net/kcms/detail/11.1358.C.20180101.001.html
Li, X., & Chen, H.	2019	Journal of Management Science	43	2	1-12	10.11818/j.issn.1000-7555.2019.02.001	http://www.cnki.net/kcms/detail/11.1358.C.20190201.001.html
Wang, Y., & Zhang, J.	2020	Journal of Management Science	44	3	1-12	10.11818/j.issn.1000-7555.2020.03.001	http://www.cnki.net/kcms/detail/11.1358.C.20200301.001.html
Li, X., & Chen, H.	2021	Journal of Management Science	45	4	1-12	10.11818/j.issn.1000-7555.2021.04.001	http://www.cnki.net/kcms/detail/11.1358.C.20210401.001.html
Wang, Y., & Zhang, J.	2022	Journal of Management Science	46	5	1-12	10.11818/j.issn.1000-7555.2022.05.001	http://www.cnki.net/kcms/detail/11.1358.C.20220501.001.html
Li, X., & Chen, H.	2023	Journal of Management Science	47	6	1-12	10.11818/j.issn.1000-7555.2023.06.001	http://www.cnki.net/kcms/detail/11.1358.C.20230601.001.html
Wang, Y., & Zhang, J.	2024	Journal of Management Science	48	7	1-12	10.11818/j.issn.1000-7555.2024.07.001	http://www.cnki.net/kcms/detail/11.1358.C.20240701.001.html
Li, X., & Chen, H.	2025	Journal of Management Science	49	8	1-12	10.11818/j.issn.1000-7555.2025.08.001	http://www.cnki.net/kcms/detail/11.1358.C.20250801.001.html
Wang, Y., & Zhang, J.	2026	Journal of Management Science	50	9	1-12	10.11818/j.issn.1000-7555.2026.09.001	http://www.cnki.net/kcms/detail/11.1358.C.20260901.001.html
Li, X., & Chen, H.	2027	Journal of Management Science	51	10	1-12	10.11818/j.issn.1000-7555.2027.10.001	http://www.cnki.net/kcms/detail/11.1358.C.20271001.001.html
Wang, Y., & Zhang, J.	2028	Journal of Management Science	52	11	1-12	10.11818/j.issn.1000-7555.2028.11.001	http://www.cnki.net/kcms/detail/11.1358.C.20281101.001.html
Li, X., & Chen, H.	2029	Journal of Management Science	53	12	1-12	10.11818/j.issn.1000-7555.2029.12.001	http://www.cnki.net/kcms/detail/11.1358.C.20291201.001.html
Wang, Y., & Zhang, J.	2030	Journal of Management Science	54	13	1-12	10.11818/j.issn.1000-7555.2030.13.001	http://www.cnki.net/kcms/detail/11.1358.C.20301301.001.html
Li, X., & Chen, H.	2031	Journal of Management Science	55	14	1-12	10.11818/j.issn.1000-7555.2031.14.001	http://www.cnki.net/kcms/detail/11.1358.C.20311401.001.html
Wang, Y., & Zhang, J.	2032	Journal of Management Science	56	15	1-12	10.11818/j.issn.1000-7555.2032.15.001	http://www.cnki.net/kcms/detail/11.1358.C.20321501.001.html
Li, X., & Chen, H.	2033	Journal of Management Science	57	16	1-12	10.11818/j.issn.1000-7555.2033.16.001	http://www.cnki.net/kcms/detail/11.1358.C.20331601.001.html
Wang, Y., & Zhang, J.	2034	Journal of Management Science	58	17	1-12	10.11818/j.issn.1000-7555.2034.17.001	http://www.cnki.net/kcms/detail/11.1358.C.20341701.001.html
Li, X., & Chen, H.	2035	Journal of Management Science	59	18	1-12	10.11818/j.issn.1000-7555.2035.18.001	http://www.cnki.net/kcms/detail/11.1358.C.20351801.001.html
Wang, Y., & Zhang, J.	2036	Journal of Management Science	60	19	1-12	10.11818/j.issn.1000-7555.2036.19.001	http://www.cnki.net/kcms/detail/11.1358.C.20361901.001.html
Li, X., & Chen, H.	2037	Journal of Management Science	61	20	1-12	10.11818/j.issn.1000-7555.2037.20.001	http://www.cnki.net/kcms/detail/11.1358.C.20372001.001.html
Wang, Y., & Zhang, J.	2038	Journal of Management Science	62	21	1-12	10.11818/j.issn.1000-7555.2038.21.001	http://www.cnki.net/kcms/detail/11.1358.C.20382101.001.html
Li, X., & Chen, H.	2039	Journal of Management Science	63	22	1-12	10.11818/j.issn.1000-7555.2039.22.001	http://www.cnki.net/kcms/detail/11.1358.C.20392201.001.html
Wang, Y., & Zhang, J.	2040	Journal of Management Science	64	23	1-12	10.11818/j.issn.1000-7555.2040.23.001	http://www.cnki.net/kcms/detail/11.1358.C.20402301.001.html
Li, X., & Chen, H.	2041	Journal of Management Science	65	24	1-12	10.11818/j.issn.1000-7555.2041.24.001	http://www.cnki.net/kcms/detail/11.1358.C.20412401.001.html
Wang, Y., & Zhang, J.	2042	Journal of Management Science	66	25	1-12	10.11818/j.issn.1000-7555.2042.25.001	http://www.cnki.net/kcms/detail/11.1358.C.20422501.001.html
Li, X., & Chen, H.	2043	Journal of Management Science	67	26	1-12	10.11818/j.issn.1000-7555.2043.26.001	http://www.cnki.net/kcms/detail/11.1358.C.20432601.001.html
Wang, Y., & Zhang, J.	2044	Journal of Management Science	68	27	1-12	10.11818/j.issn.1000-7555.2044.27.001	http://www.cnki.net/kcms/detail/11.1358.C.20442701.001.html
Li, X., & Chen, H.	2045	Journal of Management Science	69				

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The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA. Moreover, even a rudimentary investigation of Jane Doe #3's relationship to Epstein would have revealed the fact that she had been trafficked throughout the United States and internationally for sexual purposes. Nonetheless, the Government secretly negotiated a non-prosecution agreement with Epstein precluding any Federal prosecution in the Southern District of Florida of Epstein and his co-conspirators. As with Jane Doe #1, and Jane Doe #2, the Government concealed the non-prosecution agreement from Jane Doe #3 – all in violation of her rights under the CVRA – to avoid Jane Doe #3 from raising powerful objections to the NPA that would have shed tremendous public light on Epstein



and other powerful individuals and that would likely have been prevented it from being concluded in the secretive manner in which it was.

Jane Doe #4's Circumstances

If permitted to join this action, Jane Doe #4 would allege, and could prove at trial, that she has CVRA claims similar to those advanced by Jane Doe #1 and Jane Doe #2, based on the following:

As with the other Jane Does, Jane Doe #4 was repeatedly sexually abused by Epstein. In or around the summer of 2002, Jane Doe #4, an economically poor and vulnerable sixteen-year-old child, was told by another one of Epstein's underage minor sex abuse victims, that she could make \$300 cash by giving an old man a massage on Palm Beach. An acquaintance of Jane Doe #4 (also a minor sexual abuse victim of Epstein) telephoned Epstein and scheduled Jane Doe #4 to go to Epstein's house to give him a massage. During that call, Epstein himself got on the phone (a means of interstate communication) with Jane Doe #4, asking her personally to come to his mansion in Palm Beach.

Jane Doe #4 then went to Epstein's mansion and was escorted upstairs to Epstein's large bathroom by one of Epstein's assistants. Shortly thereafter Jeffrey Epstein emerged and lay face down on the table and told Jane Doe #4 to start massaging him. Epstein asked Jane Doe #3 her age and she told him she had recently turned sixteen. Epstein subsequently committed illegal sexual acts against Jane Doe #4 on many occasions.

Epstein used a means of interstate communication (i.e., a cell phone) to arrange for these sexual encounters. Epstein also frequently travelled in interstate commerce (i.e., on his personal jet) for purposes of illegally sexually abusing Jane Doe #4.

The acts Epstein committed against Jane Doe #4, constituted numerous federal sex offenses, some of which do not carry a statute of limitations and thus are not time-barred. *See* 18 U.S.C. § 3283. And these offenses were the kinds of offenses that the Federal Bureau of Investigation (FBI) and U.S. Attorney's Office for the Southern District of Florida were pursuing in 2007. So far as Jane Doe #4 is aware, the U.S. Attorney's Office made no serious effort to locate her. Instead, after identifying approximately forty separate underage sexually abused victims, and apparently preparing a 53-page federal indictment and with full awareness of the existence of many victims like Jane Doe #4 – unidentified and not interviewed – it entered into a non-prosecution agreement barring prosecution of Epstein's federal crimes against these victims. This is contrary to the Government's normal approach in prosecuting federal sex offenses. It also violated Jane Doe #4's rights under the CVRA, including the fact that she had a "reasonable" right to confer with the U.S. Attorney's Office before they entered into an agreement with a sex offender barring prosecution of him for the crimes he committed against her. 18 U.S.C. § 3771(a)(5).

#### **MOTION FOR JOINDER**

Jane Doe #3 and Jane Doe #4 now both move to join this action filed by Jane Doe #1 and Jane Doe #2, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Rule 21 provides that "[o]n motion or on its own, the court may at any time, on just terms, add . . . a party." Rule 21 "grants the court broad discretion to permit a change in the parties at any stage of a litigation." *Ford v. Air Line Pilots Ass'n Int'l*, 268 F. Supp. 2d 271, 295 (E.D.N.Y. 2003) (internal quotation omitted). The new victims should be allowed to join the current victims in this action under Rule 21.

The new victims will establish at trial that the Government violated their CVRA rights in the same way as it violated the rights of the other victims. The new victims' participation in this case is important because it appears that the Government intends to raise a factual defense that somehow it did keep Jane Doe #1 and Jane Doe #2 properly informed of what was happening in the criminal prosecution. Of course, if four victims all testify consistently that they were not properly informed by the Government (as we believe they will), that provides a stronger case for a CVRA violation.

In addition, Jane Doe #3 and Jane Doe #4's participation is relevant to a defense the Court has allowed the Government to raise. The Court has previously ruled that the victims' request for rescission of the NPA "implicates a fact-sensitive equitable defense which must be considered in the historical factual context of the entire interface between Epstein, the relevant prosecutorial authorities and the federal offense victims – including an assessment of the allegation of a deliberate conspiracy between Epstein and federal prosecutors to keep the victims in the dark on the pendency of negotiations between Epstein and federal authorities until well after the fact and presentation of the non-prosecution agreement to them as *a fait accompli*." DE 189 at 12 n.6 (emphasis added). Jane Doe #3's and Jane Doe #4's participation in this case will help to show what the "entire interface" was between the Government and the victims and thus to respond to the Government's estoppel arguments as well as other defenses that it appears to be preparing to raise. See, e.g., DE 62 (52-page response from the Government to the victim's summary judgment motion, raising numerous factually-based and other arguments against the victim's position).

Jane Doe #3's and Jane Doe #4's participation is also directly relevant to the discovery disputes currently pending in this case. The Government has raised various relevancy objections to the documents that Jane Doe #1 and Jane Doe #2 are attempting to obtain. The current victims have responded by explaining how these documents are relevant, including explaining how these documents might bear on the way in which Epstein used his powerful political and social connections to secure a favorable plea deal, as well as provide proof of the Government's motive to deliberately fail to investigate certain aspects of the victims' claims in an effort to maintain the secrecy of the facts and resolve the case without the victims' knowledge. *See, e.g.*, DE 266 at 6-10. Jane Doe #3 and Jane Doe #4's participation will help prove the relevancy of these requests, as well as the need for those requests.

One clear example is Request for Production No. 8, which seeks documents regarding Epstein's lobbying efforts to persuade the Government to give him a more favorable plea arrangement and/or non-prosecution agreement, including efforts on his behalf by Prince Andrew and former Harvard Law Professor Alan Dershowitz. Jane Doe #1 and Jane Doe #2 have alleged these materials are needed to prove their allegations that, after Epstein signed the non-prosecution agreement, his performance was delayed while he used his significant social and political connections to lobby the Justice Department to obtain a more favorable plea deal. *See, e.g.*, DE 225 at 7-8 (discussing DE 48 at 16-18). Jane Doe #3 has directly person knowledge of Epstein's connection with some of these powerful people and thus how Epstein might have used them to secure favorable treatment.

Adding two new victims to this case will not delay any of the proceedings. They will simply join in motions that the current victims were going to file in any event. For example, the



new victims will simply join in a single summary judgment motion that the current victims anticipate filing after discovery has been completed.

Nor will adding the new victims prejudice the United States. As the court is aware, this Court is still in its initial discovery stage. The Court is currently considering whether to reject the Government's assertion of privilege over documents regarding the case. See DE 265 (victims' reassertion of objections to the Government privilege claims). The new victims do not seek any additional discovery beyond that previously sought by the current victims.<sup>2</sup> 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

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<sup>2</sup> 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,

/s/ Bradley J. Edwards

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Attorneys for Jane Doe #1 and Jane Doe #2

---

■ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah

**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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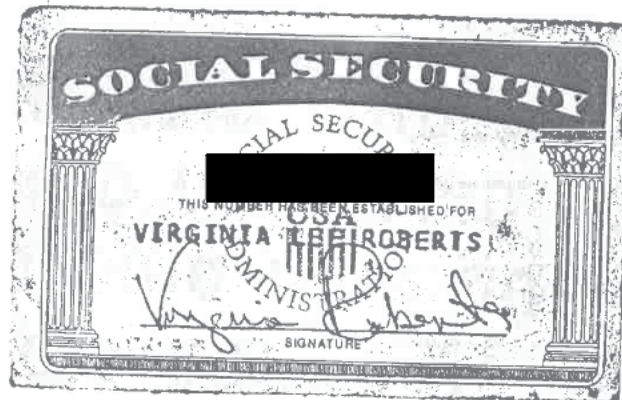
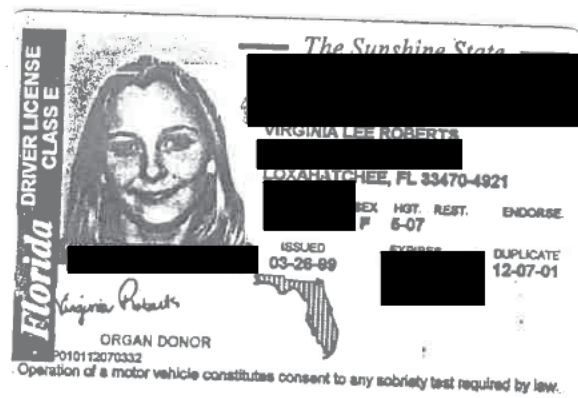
Attorneys for the Government

/s/ Bradley J. Edwards



# EXHIBIT 51

(Filed Under Seal)



## Selected docket entries for case 18–2868

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Filed	Document Description	Page	Docket Text
08/09/2019	<u>284</u> UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED	2	UNSEALED SUMMARY JUDGMENT RECORD, appendix 10 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628244] [18–2868]
08/09/2019	<u>285</u> UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED	40	UNSEALED SUMMARY JUDGMENT RECORD, appendix 11 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628246] [18–2868]
08/09/2019	<u>286</u> UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED	44	UNSEALED SUMMARY JUDGMENT RECORD, appendix 12 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628248] [18–2868]
08/09/2019	<u>287</u> UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED	99	UNSEALED SUMMARY JUDGMENT RECORD, appendix 13 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628251] [18–2868]

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

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

**15-cv-07433-RWS**

**Defendant's Reply to Plaintiff's Statement of  
Contested Facts and Plaintiff's "Undisputed Facts"  
Pursuant to Local Civil Rule 56.1**

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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**

Plaintiff's Response fails under both the Federal Rules of Evidence and the Local Civil Rules of Procedure.

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:

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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

motion, members of the media obtained copies of the motion. Ex.G at 31:2-36:4 & Depo. Exs. 3-4.

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.

To: sharon.churcher[sharon.churcher@mailonsunday.co.uk]  
 From: Virginia Giuffre  
 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 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 soooooo 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 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.

a. **Reply:** Plaintiff directs the Court to her response to paragraph 52 and suggests the factual statement is misleading. She, however, offers no contradictory admissible evidence and thus the fact should be deemed admitted.

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 9<sup>th</sup> 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 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-Lago<sup>0212</sup> (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 proffered 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] 17<sup>th</sup> 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*

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Laura A. Menninger (LM-1374)

Jeffrey S. Pagliuca (*pro hac vice*)

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*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:

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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

15-cv-07433-RWS

**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.<sup>1</sup>

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*.

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

3. 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 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.

Executed on February 10, 2017.

*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:

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/s/ Nicole Simmons

Nicole Simmons

# **EXHIBIT NN**

United States District Court  
Southern District Of New York

-----X

Virginia L. Giuffre,

Plaintiff,

v.

15-cv-07433-RWS

Ghislaine Maxwell,

Defendant.

-----X

**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  
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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  
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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  
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(020) 7628-7576  
[Philip.Barden@devonshires.co.uk](mailto: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](mailto: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](mailto:brad@pathtojustice.com)



Dated: February 24, 2016.

Respectfully submitted,

*s/ Laura A. Menninger*

---

Laura A. Menninger (LM-1374)  
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*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  
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Ft. Lauderdale, FL 33301  
smccawley@bsflp.com

*s/ Laura A. Menninger*

---

Laura A. Menninger

# EXHIBIT OO

To: Sharon.Churcher@mailonsunday.co.uk [Sharon.Churcher@mailonsunday.co.uk]  
 From: Virginia Giuffre  
 Sent: Thur 5/12/2011 2:21:43 AM  
 Importance: Normal  
 Subject: Re: Good News!!  
 Received: Thur 5/12/2011 2:21:43 AM

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" <[REDACTED]>  
 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 repped Claus 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

|----->  
 |From: |  
 |----->  
 >  
 |Virginia Giuffre [REDACTED] |  
 >  
 |----->  
 |To: |  
 |----->  
 >  
 |Sharon Churcher |  
 >  
 |----->  
 |Date: |  
 |----->  
 >  
 |10/05/2011 23:00 GDT |  
 >  
 |----->  
 |Subject: |  
 |----->  
 >  
 |Good News!! |  
 >  
 |----->

|----->  
 |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. Were |  
 |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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Registered No 84121 England.



To: Sharon Churcher [Sharon.Churcher@mailonsunday.co.uk]  
 From: Virginia Giuffre  
 Sent: Wed 6/8/2011 11:19:55 PM  
 Importance: Normal  
 Subject: Re: Virginia Roberts  
 Received: Wed 6/8/2011 11:19:55 PM

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

Roo's. You lucky things -- but did you have to duck under spider webs? They were strung between trees when I went.

Re Jarred: it is a nailbiting wad but remember he is only one agent. He was keen to see it which is good. If he doesn't go for it, there are others. Different tastes. When did you send it?

Shazza  
 X000

From: Virginia Giuffre [REDACTED]  
 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 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: "jarred halperin agent (jarred@objectivecent.com)" <jarred@objectivecent.com>  
 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 Bulow'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://www.dailymail.co.uk/news/article-1381039/Prince-Andrew-girl-17-sex-offender-friend-flew-Britain-meet-him.html>

<http://www.dailymail.co.uk/news/article-1383452/Bill-Clinton-16-year-old-masseuse-I-met-twice-claims-Epsteins-girl.html>

[http://www.nypost.com/p/news/local/manhattan/pervy\\_mogul\\_lent\\_me\\_out\\_BaV1IrcQq9ADFIQXewy0J](http://www.nypost.com/p/news/local/manhattan/pervy_mogul_lent_me_out_BaV1IrcQq9ADFIQXewy0J)

[http://blogs.villagevoice.com/runninscared/2011/02/virginia\\_robert.php](http://blogs.villagevoice.com/runninscared/2011/02/virginia_robert.php)

<http://billionaires.forbes.com/article/03xq112IP9nv> (This one, in Forbes Magazine, seems to require subscribing but you get the gist)

<http://www.telegraph.co.uk/news/uknews/theroyalfamily/8362690/Prince-Andrew.html>

<http://www.dailymail.co.uk/news/the-prince-a-paedophile-and-the-sex-slave-teen/story-e6frejy9-1226013783984>

[http://nymag.com/nymetro/news/people/n\\_7912/](http://nymag.com/nymetro/news/people/n_7912/)

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# **EXHIBIT PP**



IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

---

CONFIDENTIAL VIDEO DEPOSITION OF  
VIRGINIA GIUFFRE, VOLUME II

November 14, 2016

---

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

---

APPEARANCES:

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

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.

By Laura Menninger, Esq.

3 Jeffrey S. Pagliuca, Esq.

150 East 10th Avenue

4 Denver, CO 80203

Phone: 303.831.7364

5 lmenninger@hmflaw.com

jpagliuca@hmflaw.com

6 Appearing on behalf of the

Defendant

7  
Also Present:

8 Ann Lundberg, Paralegal

Maryvonne Tompkins, Videographer

Pursuant to Notice and the Federal Rules  
of Civil Procedure, the continued video  
deposition of VIRGINIA GIUFFRE, called by Defendant,  
was taken on Monday, November 14, 2016, commencing at  
8:04 a.m., at 150 East 10th Avenue, Denver, Colorado,  
before Pamela J. Hansen, Registered Professional  
Reporter, Certified Realtime Reporter and Notary  
Public within Colorado.

\* \* \* \* \*

I N D E X

VIDEO DEPOSITION OF VIRGINIA GIUFFRE, VOLUME II

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By Ms. Menninger	354

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Exhibit 20 Page from the Mar-a-Lago Club Employment Policies, Revised 10/2001	550

1 didn't see them take pictures of the backs of them.

2 I'm not too sure who.

3 Q You don't remember sending to them a  
4 photograph that included this wood around another  
5 photograph?

6 A No.

7 Q Okay. You have mentioned a journalist by  
8 the name of Sharon Churcher.

9 A Yes.

10 Q You are aware that Sharon Churcher  
11 published news stories about you?

12 A Yes.

13 MS. MCCAWLEY: Objection.

14 Go ahead.

15 Q (BY MS. MENNINGER) Is anything that you  
16 have read in Sharon Churcher's news stories about you  
17 untrue?

18 A I think Sharon did print some things that  
19 I think she elaborated or maybe misheard. But, I  
20 mean, if you have a specific document to show me, I'd  
21 love to look at it and read it and tell you what I  
22 think.

23 Q Is there anything, as you sit here today,  
24 that you know of that Sharon Churcher printed about  
25 you that is not true?

1           A       Not off the top of my head. If you show  
2       me, like, a news clipping article or something, I can  
3       definitely read it for you.

4           Q       Is there anything that you know of that  
5       Sharon Churcher has printed about Ghislaine Maxwell  
6       that is not true?

7           A       No, not off -- no, not off the top of my  
8       head.

9           Q       Is there anything that you recall saying  
10      to Sharon Churcher that she then printed something  
11      different than what you had said to her?

12          A       Yeah, I've read stuff. I mean, I just --  
13      I can't remember what, but I read something that I  
14      think was, Oh, she got that wrong. I can't remember  
15      an exact example off the top of my head.

16          Q       Did you ever complain to Sharon Churcher  
17      about things that she got wrong?

18          A       I didn't see a point. I might have, but  
19      I -- I didn't see a point really because it's already  
20      printed, you know.

21          Q       You had a fairly voluminous set of  
22      communications with Sharon Churcher by e-mail,  
23      correct?

24                   MS. MCCAWLEY: Objection.

25          A       Voluminous, like a lot of them?

1 Q (BY MS. MENNINGER) Yes.

2 A Yes.

3 Q And during any of those communications, do  
4 you know whether she printed things about you after  
5 you had any of those communications?

6 MS. MCCAWLEY: Objection.

7 A I don't know. I know a lot of stuff was  
8 printed, and I never really stopped to read who  
9 printed the article, or wrote the article, I should  
10 say. Sorry.

11 Q (BY MS. MENNINGER) Okay. I'll show you  
12 Defendant's Exhibit 7.

13 (Exhibit 7 marked.)

14 THE DEPONENT: Thank you.

15 Q (BY MS. MENNINGER) I'll let you read  
16 through the statements on the first page there, and  
17 if there is anything that is not absolutely true,  
18 just put a check by it and we'll come back to it.

19 A It's not very clear how she wrote it. "I  
20 flew to the Caribbean with Jeffrey and then Ghislaine  
21 Maxwell went to pick up Bill in a huge black  
22 helicopter that Jeffrey had bought her."

23 That wasn't an eyewitness statement.  
24 Like, I didn't see her do it. Ghislaine was the one  
25 who told me about that; that she's the one who flew



1 Bill.

2 Q All right. If you just want to put a  
3 check by it, then we'll just come back and talk about  
4 each one.

5 A Okay.

6 Q Just to move things along.

7 A Okay. I have made three checkmarks.

8 Q All right.

9 MS. MCCAWLEY: And I just -- before you  
10 continue, I just want to identify for the record,  
11 since this doesn't have any identifiers on it, are  
12 you representing that these are statements from  
13 Sharon Churcher?

14 MS. MENNINGER: I'm not representing  
15 anything. I'm asking the witness questions about  
16 these statements. I asked her is anything on here  
17 not true. That's all I asked her.

18 Q (BY MS. MENNINGER) So which ones did you  
19 put checkmarks by, Ms. Giuffre?

20 A I'd have been -- I'm sorry. "I'd have  
21 been about 17 at the time. I flew to the Caribbean  
22 with Jeffrey and then Ghislaine Maxwell went to pick  
23 up Bill in a huge black helicopter that Jeffrey had  
24 bought her."

25 Q Okay. And what else did you put a check

1 by?

2 A "I used to get frightened flying with her  
3 but Bill had the Secret Service with him and I  
4 remember him talking about what a good job" --  
5 sorry -- "job she did."

6 Q Okay. And what else did you put a check  
7 by?

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

12 Q Other than the three you've just  
13 mentioned --

14 A Yeah.

15 Q -- everything else on here is absolutely  
16 accurate?

17 MS. MCCAWLEY: Objection.

18 A Yes. Well, to the best of my  
19 recollection, yes.

20 Q (BY MS. MENNINGER) All right. What is  
21 inaccurate about, "I'd have been about 17 at the  
22 time. I flew to the Caribbean with Jeffrey and then  
23 Ghislaine Maxwell went to pick up Bill in a huge  
24 black helicopter that Jeffrey had bought her"?

25 A Because it makes it kind of sound like an

1 eyewitness thing.

2 Q Okay. Did you say that statement to  
3 Sharon Churcher?

4 A I said to Sharon that Ghislaine told me  
5 that she flew Bill in the heli- -- the black  
6 helicopter that Jeffrey bought her, and I just wanted  
7 to clarify that I didn't actually see her do that. I  
8 heard from Ghislaine that she did that.

9 Q You heard that from Ghislaine, and then  
10 you reported to Sharon Churcher that you had heard  
11 that from Ghislaine.

12 A Correct.

13 MS. MCCAWLEY: Objection.

14 A I heard a lot of things from Ghislaine  
15 that sounded too true -- too outrageous to be true,  
16 but you never knew what to believe, so...

17 Q (BY MS. MENNINGER) Okay. And after  
18 Sharon Churcher printed what she said you said, did  
19 you complain to her that it was inaccurate?

20 A I might have verbally with her, but again,  
21 I didn't see a point in making a hissy over it  
22 because what was done was done. She had already  
23 printed.

24 Q What was inaccurate about, "I used to get  
25 frightened flying with her but Bill" said -- "had the

1 Secret Service with him and I remember him talking  
2 about what a good job she did"?

3 A I just don't remember saying that to her.  
4 I don't remember saying I remember him talking about  
5 what a good job she did.

6 Q All right.

7 A I just don't remember that at all.

8 Q Okay. And I guess, just to be clear, my  
9 questions wasn't do you remember saying this to  
10 Sharon Churcher; my question is, is that statement  
11 accurate?

12 MS. MCCAWLEY: Well, objection.

13 Q (BY MS. MENNINGER) Did you used to get  
14 frightened flying with her?

15 A Yes.

16 Q Okay. Did Bill have the Secret Service  
17 with him?

18 A They were there, but not like on the --  
19 not where we were eating.

20 Q Do you remember Bill talking about what a  
21 good job she did?

22 A I don't remember that.

23 Q So what is inaccurate about that  
24 statement?

25 A I just -- it's inaccurate because I don't



1 remember him talking about what a good job she did.

2 I don't remember that.

3 Q Does it inaccurately suggest that Bill had  
4 the Secret Service with him on a helicopter?

5 MS. MCCAWLEY: Objection.

6 A Well, not being an eyewitness to it, I  
7 wouldn't be able to tell you. I can't tell you what  
8 I don't know.

9 Q (BY MS. MENNINGER) And do you believe you  
10 said that statement to Sharon Churcher?

11 A I mean, Sharon and I talked a lot, and if  
12 she misheard me or just wrote it in the way that she  
13 thought she should, I have no control over that. So  
14 I'm not too sure.

15 Q Did she record your interviews?

16 A Some of them. Some of them she didn't. I  
17 mean, we, like -- we, like, met for like a week, and  
18 we spent a lot of time together, and then even after  
19 that we just continued, like, kind of a friendship.

20 Q All right. What's inaccurate about the  
21 last statement on that page?

22 A "Donald Trump was also a good friend of  
23 Jeffrey's." That part is true.

24 "He didn't partake in any" of -- "any sex  
25 with any of us but he flirted with me." It's true

1       that he didn't partake in any sex with us, and but  
2       it's not true that he flirted with me. Donald Trump  
3       never flirted with me.

4               Then the next sentence is, "He'd laugh and  
5       tell Jeffrey, 'you've got the life.'" I never said  
6       that to her.

7               Q       When you say, "he didn't partake in any  
8       sex with any of us," who is "us"?

9               A       Girls. Just --

10              Q       How do you know who Donald Trump -- Trump  
11       had sex with?

12              A       Oh, I didn't physically see him have sex  
13       with any of the girls, so I can't say who he had sex  
14       with in his whole life or not, but I just know it  
15       wasn't with me when I was with other girls.

16              Q       And who were the other girls that you were  
17       with in Donald Trump's presence?

18              A       None. There -- I worked for Donald Trump,  
19       and I've met him probably a few times.

20              Q       When have you met him?

21              A       At Mar-a-Lago. My dad and him, I wouldn't  
22       say they were friends, but my dad knew him and they  
23       would talk all the time -- well, not all the time but  
24       when they saw each other.

25              Q       Have you ever been in Donald Trump and

1 Jeffrey Epstein's presence with one another?

2 A No.

3 Q What is the basis for your statement that  
4 Donald Trump is a good friend of Jeffrey's?

5 A Jeffrey told me that Donald Trump is a  
6 good friend of his.

7 Q But you never observed them together?

8 A No, not that I can actually remember. I  
9 mean, not off the top of my head, no.

10 Q When did Donald Trump flirt with you?

11 A He didn't. That's what's inaccurate.

12 Q Did you ever see Donald Trump at Jeffrey's  
13 home?

14 A Not that I can remember.

15 Q On his island?

16 A No, not that I can remember.

17 Q In New Mexico?

18 A No, not that I can remember.

19 Q In New York?

20 A Not that I can remember.

21 Q All right. If you could turn to the  
22 second page and read through those. Let me know if  
23 any of those are inaccurate. Just put a check by  
24 them and then we'll come back.

25 A Okay.

1 MS. MCCAWLEY: Before you go, Virginia,  
2 I'm going to object to the use of the second page of  
3 this document. There's no time frame on it. There's  
4 no source reference to it, so it's entirely unclear  
5 where this has come from.

6 Q (BY MS. MENNINGER) Okay. Are you done?

7 A Yes.

8 Q Okay. What's the first one you've put a  
9 check by?

10 A "The hammock photo was all over the  
11 houses," in parentheses. And Bill Clinton and -- I'm  
12 sorry, "Bill Clinton and Andrew," in parentheses,  
13 "had to have seen it."

14 "All over the houses" is not my statement  
15 and an exaggeration. They did have that picture in  
16 the houses. And I believe, if I remember the  
17 conversation correctly, she asked, Could have Bill  
18 Clinton and Andrew seen the picture? And I said,  
19 Yes, it's possible that they could have seen it.

20 So, I mean, it's just that -- it's not  
21 that it's totally inaccurate. I just think it's like  
22 journalist writing, had to have seen it. It doesn't  
23 mean they saw it. I just think that if it was in  
24 front of them, they would have seen it.

25 Q So she told you that -- you told her that



1 the photograph was in the houses -- houses?

2 A Yes. I know he had it in New York on his  
3 desk. I know he had it in Palm Beach. I know he had  
4 it in the Caribbean. And I don't know if he had it  
5 in New Mexico. I can't remember New Mexico. Maybe.

6 Q Where in Palm Beach was the photograph?

7 A The massage room.

8 Q Was that -- you did not say that they --  
9 it was all over the houses?

10 A Correct. All over the houses would imply  
11 that it's everywhere in the house, so...

12 Q You did not say that Andrew and Clinton  
13 had to have seen the photograph?

14 A Correct. I -- it was more of a, if they  
15 were in front of it, they would have seen it, kind of  
16 a thing. I'm not saying it right. But it wasn't,  
17 like, had to have seen it.

18 Q All right. What's the next statement that  
19 you put a check by?

20 A I'm sorry, excuse me. My kids shared a  
21 beautiful cough with me again.

22 "I spent four years as a millionaire's  
23 personal masseuse."

24 Q What is inaccurate about that statement?

25 A We now know, according to the timelines

1 that Mar-a-Lago was able to provide for us, that it  
2 was not four years.

3 Q How many years was it?

4 A More like 2-1/2, I think, if I'm right, or  
5 two. I'm sorry, I'm really bad at math. But yes,  
6 the two period.

7 Q What's the next statement that you have  
8 put a check by?

9 A "I was a pedophile's dream." I think she  
10 took that out of context and made that her own little  
11 headline.

12 Q Did you say that to her?

13 A I said something along the line like, I --  
14 the -- the pedos loved me because I would do  
15 everything that they wanted for them. But do I think  
16 that -- yeah, I -- I know she made that line up  
17 herself, the pedos -- pedophile's dream.

18 Q What's the next one you put a check by?

19 A I put a question mark next to the next  
20 one. It says, "Three years later she was reunited  
21 with her family." I don't know what that pertains  
22 to. I don't know what timeline that means.

23 Q Was there a period of three years where  
24 you were not with your family?

25 A There's been longer periods than that

1       that -- when I wasn't with my family. That's what I  
2       mean, I don't understand where that comes from.

3       "Three years later she was reunited with her family."

4               Q       Prior to 2002, was there a period of three  
5       years where you were not with your family?

6               A       No.

7               Q       Okay. Did you say to Sharon Churcher,  
8       three years later, she was reunited with her family?

9               A       That's what I don't understand. I don't  
10      even know what that time periods pertains to.

11              Q       Do you recall saying that to Sharon  
12      Churcher?

13              A       No.

14              Q       What's the next one you put a check by?

15              A       "After about two years he started to ask  
16      me to entertain his friends."

17              Q       What's wrong with that statement?

18              A       It wasn't two years. I don't know where  
19      she got that from.

20              Q       Okay. How long was it?

21              A       Like, I can't give you an exact time  
22      period, but it wasn't right in the beginning. It was  
23      after my training, or so to speak training. So, I  
24      mean, my best guesstimate would be anywhere between  
25      four to six months.

1 Q So you did not say to Sharon Churcher,  
2 "After about two years he asked me to entertain his  
3 friends"?

4 A Correct.

5 Q What's the next one you put a check by?

6 A That's it. That's all I put a checkmark  
7 next to.

8 Q So the rest of these are absolutely  
9 accurate?

10 A Nothing a journalist writes is absolutely  
11 accurate, but it's -- it sounds accurate, yes.

12 Q Do you recall Jeffrey Epstein saying to  
13 you, "I've got a good friend and I need you to fly to  
14 the island to entertain him, massage him and make him  
15 feel how you make me feel"?

16 MS. MCCAWLEY: Objection.

17 Go ahead.

18 A I do remember him saying that, and I think  
19 that's more of a general- -- generalization for all  
20 the times that I was sent to the -- where is this --  
21 the island to entertain people. And that would be a  
22 quote that she made but from my words saying that's  
23 what he said to me when I had to go be with these  
24 people that he sent me to.

25 Q (BY MS. MENNINGER) Did you say that



1 sentence to her?

2 MS. MCCAWLEY: Objection.

3 A I -- I can't remember. Like I said, I  
4 think it's more of a generalization.

5 Q (BY MS. MENNINGER) Did you meet Al Gore?

6 A Yes.

7 Q Did you meet Heidi Klum?

8 A Yes.

9 Q Did you meet Naomi Campbell?

10 A Yes.

11 Q Did you go on a six-week trip with Epstein  
12 in 2001?

13 A Yeah. Yes. Sorry.

14 Q When in 2001 did you go on a six-week trip  
15 with him?

16 A I don't remember exactly when it was, but  
17 it's that -- it's the one where we went to Tangier,  
18 Morocco, England. I can't remember where else we  
19 went. France.

20 Q Did the FBI tell you that Epstein had  
21 hidden cameras watching you the entire time, even  
22 when you were in the bathroom?

23 A Yes.

24 Q Did the FBI tell you "Everything he did  
25 was illegal because I was under age"?

1 A Yes.

2 Q Who in the FBI told you that?

3 A Whichever agent I was talking to.

4 Q Which agent were you talking to?

5 A I can't remember. I know I was talking to  
6 Jason Richards, and there was a girl, I think -- I  
7 want -- I want to say her name was Christina Pryor,  
8 just off the top of my head. And then I think there  
9 was two other agents actually at the consulate  
10 building. I don't remember their names. Very hazy.

11 Q When was this conversation with the FBI?

12 A After Sharon printed the articles, the  
13 first articles that came out. I don't know how many  
14 she printed, but when the first articles came out,  
15 after that the FBI contacted me.

16 Q And was the statement that the FBI told  
17 you "Everything he did was illegal because I was  
18 under age," in response to you telling them that you  
19 were age 15 when you met Jeffrey?

20 MS. MCCAWLEY: Objection.

21 A Well, that was the closest proximity I had  
22 to go off of.

23 Q (BY MS. MENNINGER) Okay.

24 A So, yes. Although I still was under age,  
25 I mean, even if I was 16 and 17.

1 Q Okay. And then if you could do the last  
2 page, same way; a check by anything that's not  
3 absolutely accurate.

4 MS. MCCAWLEY: Okay. I'm going to object  
5 to this as the last page has no identifier of time or  
6 source on it.

7 A Okay. I'm ready.

8 Q (BY MS. MENNINGER) All right. Which ones  
9 are inaccurate?

10 A The first one is, "Virginia got a  
11 part-time job as a changing room assistant." I was a  
12 full-time person there. Sorry.

13 Q Okay. So did you say that to Sharon?

14 A Again, I don't remember that exact  
15 conversation, but I know it was a full-time job,  
16 and -- I mean, full-time as in the, you know, the 9  
17 to 5 or whatever hours it was, so it wasn't  
18 part-time. I don't remember the exact conversation  
19 that we had.

20 Q Okay. What's the next thing you put a  
21 check by?

22 A I put a question mark next to, "Another  
23 lady led me into Jeffrey's bedroom. The lady walked  
24 me straight through into the massage room."

25 I have no idea what circumstance that

1       pertains to. Again, I don't know what that means. I  
2       don't even know what other lady she's talking about.  
3       So...

4               Q       So you don't recall saying that to Sharon  
5       Churcher?

6               A       Correct. I don't even know what it means.

7               Q       Okay. What's the next one you have a  
8       check by?

9               A       "Afterwards, she was given two \$100 bills  
10       and told to return the next day. That was the  
11       beginning of the four years she spent with Epstein."

12              Q       All right. What's wrong about that  
13       statement?

14              A       Well, again, I just want to say that the  
15       four years was inaccurate based upon memory and not  
16       an actual timeline that we were able to get.

17              Q       Did you say that to Sharon Churcher, that  
18       it was four years?

19              A       I don't know if I said that to her or --  
20       oh, yeah, did I tell her it was four years? Yes, I  
21       did. I'm sorry.

22              Q       Okay. What else did you put a check by?

23              A       Well, this one is a question mark again.  
24       "Radar online has obtained exclusive diary entries of  
25       a Teen Sex Slave."



1                   It wasn't really a diary. It was, like, I  
2           don't know how many pages of something that I wrote,  
3           and Sharon used it, so...

4           Q       Did you tell Sharon it was your diary  
5           entry?

6           A       She knew it wasn't a diary entry. No.

7           Q       Okay. Were you a teen sex slave?

8           A       Yes.

9           Q       What's the next one you have a checkmark  
10          by?

11          A       "I also saw Prince Andrew at a Ranch in  
12          New Mexico."

13          Q       Did you tell that to Sharon Churcher?

14          A       No. And I think it's a mistake. Maybe  
15          she meant somewhere else, but because we had been  
16          talking about so much, maybe she just put New Mexico.  
17          I don't think Sharon intentionally lied on any of  
18          these. I just -- I think we talked so much over a  
19          period of a week, and then after that we had phone  
20          conversations, and so on and so forth, that some of  
21          the information just got misheard or mishandled, or  
22          whatever.

23          Q       And what was printed was inaccurate?

24          A       Was that printed? I don't -- I don't  
25          remember reading that in the papers, but if it was

1 printed it's inaccurate.

2 Q Do you recall reading any of the ones that  
3 you put a checkmark by in the papers?

4 A There's been so much printed, it's hard  
5 for me to remember. I mean, yes, it does sound like  
6 stuff I read before.

7 Q When you spoke with Sharon Churcher, you  
8 agreed to waive your anonymity, right?

9 A I did.

10 Q Why did you agree to do that?

11 A I felt it was time for me to tell my  
12 story. I felt it was a good time for me to come  
13 forward. I had done so much healing, and I thought  
14 that it would be good for other people to hear what's  
15 going on, how it's happening, how vulnerable other  
16 girls can be and not even know the damage that it  
17 causes later in life. And I just thought it would be  
18 the right thing to do to come forward.

19 Q You authorized her to publish your name?

20 A I did.

21 Q And your photograph?

22 A Yes.

23 Q In 2011?

24 A I think that was the year, yes.

25 Q You posed for photographs with her,

1 I, VIRGINIA GIUFFRE, do hereby certify that  
2 I have read the foregoing transcript and that the  
3 same and accompanying amendment sheets, if any,  
4 constitute a true and complete record of my  
5 testimony.

6 \_\_\_\_\_  
Signature of Deponent

7 ( ) No amendments

8 ( ) Amendments attached

9  
10 Acknowledged before me this \_\_\_\_\_ day  
11 of \_\_\_\_\_, 20\_\_\_\_.

12  
13 Notary Public: \_\_\_\_\_

14 My Commission Expires: \_\_\_\_\_

15 Seal:

16 PJH  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 STATE OF COLORADO)

2 ) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER )

4 I, Pamela J. Hansen, do hereby certify that  
5 I am a Registered Professional Reporter and Notary  
6 Public within the State of Colorado; that previous to  
7 the commencement of the examination, the deponent was  
8 duly sworn to testify to the truth.

9 I further certify that this deposition was  
10 taken in shorthand by me at the time and place herein  
11 set forth, that it was thereafter reduced to  
12 typewritten form, and that the foregoing constitutes  
13 a true and correct transcript.

14 I further certify that I am not related to,  
15 employed by, nor of counsel for any of the parties or  
16 attorneys herein, nor otherwise interested in the  
17 result of the within action.

18 In witness whereof, I have affixed my  
19 signature this 23rd day of November, 2016.

20 My commission expires September 3, 2018.

21  
22  
23 Pamela J. Hansen, CRR, RPR, RMR  
24 216 - 16th Street, Suite 600  
25 Denver, Colorado 80202



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.'

EXHIBIT

Giuttre  
AGREN BLANDO REPORTING  
11-14-16

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.

2 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.

# EXHIBIT QQ



**To:** sharon churcher[sharon.churcher@mailonsunday.co.uk]  
**From:** Virginia Giuffre  
**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 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 INT'L 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 soooooo 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 as 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

# **EXHIBIT RR**

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

---

CONFIDENTIAL VIDEOTAPED DEPOSITION OF  
VIRGINIA GIUFFRE

May 3, 2016

---

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

---

APPEARANCES:

FAMER, JAFFE, WEISSING, EDWARDS, FISTOS &  
LEHRMAN, P.L.

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5 lmenninger@hmflaw.com

jpagliuca@hmflaw.com

6 Appearing on behalf of the

7 Defendant

Also Present:

8 Brenda Rodriguez, Paralegal

9 Nicholas F. Borgia, CLVS Videographer



Pursuant to Notice and the Federal Rules of Civil Procedure, the VIDEOTAPED DEPOSITION OF VIRGINIA GIUFFRE, called by Defendant, was taken on Tuesday, May 3, 2016, commencing at 9:00 a.m., at 150 East 10th Avenue, Denver, Colorado, before Kelly A. Mackereth, Certified Shorthand Reporter, Registered Professional Reporter, Certified Realtime Reporter and Notary Public within Colorado.

\* \* \* \* \*

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PRODUCTION REQUEST(S):

(None.)

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1 Some names have been changed in order to protect  
2 other people.

3 Q (BY MS. MENNINGER) Protect their privacy?

4 A Protect their privacy, yeah, I would say,  
5 just not getting them involved in, if this were to  
6 ever go public.

7 Q Well, again, without rereading the whole  
8 manuscript --

9 A Reading it, yeah. I'm trying to see if I  
10 can -- see something in here.

11 Q Let me narrow my question and maybe that  
12 will help.

13 A Yes.

14 Q Is there anything -- well, first of all,  
15 did you author that entire manuscript?

16 A Yes, I did.

17 Q Did anyone else author part of that  
18 manuscript?

19 A Do you mean did anyone else write this  
20 with me?

21 Q Right.

22 A No.

23 Q That's all your writing?

24 A This is my writing.

25 Q Okay. To the best of your recollection,

1 as you sit here right now, is there anything in that  
2 manuscript about Ghislaine Maxwell that is untrue?

3 A I don't believe so. Like I said, there is  
4 a lot of stuff that I actually have left out of here.

5 Q Um-hum.

6 A So there is a lot more information I could  
7 put in there. But as far as Ghislaine Maxwell goes,  
8 I would like to say that there is 99.9 percent of it  
9 would be to the correct knowledge.

10 Q All right. Is there anything that you --  
11 and I understand you're doing this from memory. Is  
12 there anything that you recall, as you're sitting  
13 here today, about Ghislaine Maxwell that is contained  
14 in that manuscript, that is not true?

15 A You know, I haven't read this in a very  
16 long time. I don't believe that there's anything in  
17 here about Ghislaine Maxwell that is not true.

18 MR. EDWARDS: I'd just ask, Counsel, if  
19 you have anything specific to show her about  
20 Ghislaine Maxwell --

21 MS. MENNINGER: I'll ask questions.

22 MR. EDWARDS: -- I'll have her look at it.

23 MS. MENNINGER: I'll ask questions.

24 MR. EDWARDS: I know, but I want the  
25 record clear that if she hasn't read it in a long

1 I, VIRGINIA GIUFFRE, do hereby certify that  
2 I have read the foregoing transcript and that the  
3 same and accompanying amendment sheets, if any,  
4 constitute a true and complete record of my  
5 testimony.

6  
7  
8  
9 \_\_\_\_\_  
Signature of Deponent  
10 ( ) No Amendments  
( ) Amendments Attached

11 Acknowledged before me this  
12 \_\_\_\_\_ day of \_\_\_\_\_, 2016.

13  
14 Notary Public: \_\_\_\_\_

15 Address: \_\_\_\_\_

16 \_\_\_\_\_  
17 My commission expires \_\_\_\_\_

18 Seal:  
19  
20

21 KAM  
22  
23  
24  
25

1 STATE OF COLORADO)

2 ) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER )

4 I, Kelly A. Mackereth, do hereby certify  
5 that I am a Registered Professional Reporter and  
6 Notary Public within the State of Colorado; that  
7 previous to the commencement of the examination, the  
8 deponent was duly sworn to testify to the truth.

9 I further certify that this deposition was  
10 taken in shorthand by me at the time and place herein  
11 set forth, that it was thereafter reduced to  
12 typewritten form, and that the foregoing constitutes  
13 a true and correct transcript.

14 I further certify that I am not related to,  
15 employed by, nor of counsel for any of the parties or  
16 attorneys herein, nor otherwise interested in the  
17 result of the within action.

18 In witness whereof, I have affixed my  
19 signature this 11th day of May, 2016.

20 My commission expires April 21, 2019.

21  
22  
23 Kelly A. Mackereth, CRR, RPR, CSR  
24 216 - 16th Street, Suite 600  
25 Denver, Colorado 80202



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

VIRGINIA GIUFFRE,

Giuffre,

15 Civ. 7433

-against-

SEALED  
OPINION

GHISLAINE MAXWELL,

Maxwell.

-----X

A P P E A R A N C E S:

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By: Laura A. Menninger, Esq.  
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**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.

6. Giuffre moved to join the CVRA Action on December 30, 2014, claiming she, too, had her CVRA rights violated by the Government. On January 1, 2015, Giuffre filed a "corrected" joinder motion. See *Jane Doe 1 and Jane Doe 2 v. United States*, No. 9:08-cv-80736-KAM, Docket No. 280 (S.D. Fla. Jan. 2, 2015) ("CVRA Joinder Mot."). Giuffre's joinder motion in this unrelated action included gratuitous and "lurid" accusations.

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

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." *Jane Doe 1 and Jane Doe 2 v. United States*, No. 9:08-cv-80736-KAM, Docket No. 324 (S.D. Fla. Apr. 7, 2015) ("CVRA Mot. Op.") at 5. Yet, "the bulk of the [motion] consists of copious factual details that [Ms. Giuffre] and [her co-movant] 'would prove . . . if allowed to join.'" *Id.* Giuffre gratuitously included provocative and "lurid details" of her alleged sexual activities as an alleged victim of sexual trafficking.

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.

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.
- NadiaMarcinkova ("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:

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**From:** G Maxwell <GMax1@ellmax.com>  
**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 Derschwitz 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](mailto:ross@acuityreputation.com)>  
Date: 2 January 2015 at 20:38  
Subject: Ghislaine Maxwell  
To: Rossacuity Gow <[ross@acuityreputation.com](mailto:ross@acuityreputation.com)>  
bcc: [martin.robinson@mailonline.co.uk](mailto:martin.robinson@mailonline.co.uk),  
[P.Peachey@independent.co.uk](mailto:P.Peachey@independent.co.uk),  
[nick.sommerlad@mirror.co.uk](mailto:nick.sommerlad@mirror.co.uk),  
[david.brown@thetimes.co.uk](mailto:david.brown@thetimes.co.uk),  
[nick.alway@bbc.co.uk](mailto:nick.alway@bbc.co.uk),  
[jo-anne.pugh@bbc.co.uk](mailto: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

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 prefaced 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 "republishing" 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.



Date	Nature	Publishing Entity	Statement/URL
January 2, 2015	Internet	Ross Gow	<p>Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.</p> <p>Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms. Roberts that Alan Dershowitz is involved in having sexual relations with her, which he denies.</p> <p>Ms. Roberts's claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory.</p> <p>Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.</p>
January 2, 2015	Internet	Bolton News	<a href="http://www.theboltonnews.co.uk/news/national/11700192/Palace-denies-Andrew-sex-case-claim/">http://www.theboltonnews.co.uk/news/national/11700192/Palace-denies-Andrew-sex-case-claim/</a>
January 3, 2015	Internet	Telegraph	<a href="http://www.telegraph.co.uk/news/uknews/theroyalfamily/11323872/Prince-Andrew-denies-having-relations-with-sex-slave-girl.html">http://www.telegraph.co.uk/news/uknews/theroyalfamily/11323872/Prince-Andrew-denies-having-relations-with-sex-slave-girl.html</a>
January 3, 2015	Internet	Daily Mail	<a href="http://www.dailymail.co.uk/news/article-2895366/Prince-Andrew-lobbied-government-easy-Jeffrey-Epstein-Palace-denies-claims-royal-tried-use-influence-help-billionaire-paedophile-2008-police-probe.html">http://www.dailymail.co.uk/news/article-2895366/Prince-Andrew-lobbied-government-easy-Jeffrey-Epstein-Palace-denies-claims-royal-tried-use-influence-help-billionaire-paedophile-2008-police-probe.html</a>
January 3, 2015	Internet	Huffington Post	<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>

January 4, 2015	Internet	Express	<a href="http://www.express.co.uk/news/world/550085/Ghislaine-Maxwell-Jeffrey-Epstein-not-madam-paedophile-Florida-court-case-Prince-Andrew">http://www.express.co.uk/news/world/550085/Ghislaine-Maxwell-Jeffrey-Epstein-not-madam-paedophile-Florida-court-case-Prince-Andrew</a>
January 4, 2015	Internet	Jewish News Online	<a href="http://www.jewishnews.co.uk/dershowitz-nothing-prince-andrews-sex-scandal/">http://www.jewishnews.co.uk/dershowitz-nothing-prince-andrews-sex-scandal/</a>
January 5, 2015	Internet/Broadcast	NY Daily News	<a href="http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505">http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505</a>
January 5, 2015	Internet/Broadcast	AOL UK	<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>

**Two newest articles**

<sup>[1]</sup> <https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/>

<sup>[2]</sup> <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.

36. Giuffre 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, Giuffre re-enrolled at Wellington Adult High School on June 21, 2000, again on August 16, 2000 and on August 14, 2001. On September 20, 2001, Giuffre then enrolled at Royal Palm Beach High School. A few weeks later, on October 12, 2001, she matriculated at

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



times between December 11, 2000 to July 28, 2001 and June 21, 2002 to August 21, 2002.

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 unsuccessfully 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."

*Id.* 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

(quoting *Rinaldi v. Viking Penguin, Inc.*, 420 N.E.2d 377, 382 (N.Y. 1981)).

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. Gow'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

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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 [wa]s 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



. . . are not substantially true." *Boehner v. Heise*, 734 F. Supp. 2d 389, 399 (S.D.N.Y. 2010).

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.

*Giuffre v. Maxwell*, 165 F. Supp. 3d 147, 152 (S.D.N.Y. 2016).

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]tatements 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.").



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.

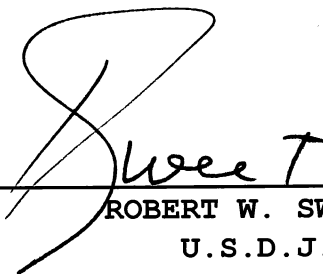
**VII. Conclusion**

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 22, 2017



ROBERT W. SWEET  
U.S.D.J.