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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 08-CV-80893-MARRA/JOHNSON

JANE DOE,

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT

COMES NOW the Plaintiff, Jane Doe, by and through her undersigned counsel, pursuant to Fed.R.Civ.P. 33 and S.D. Fla. 26.1.G., and propounds unto the Defendant, Jeffrey Epstein, her First Set of Interrogatories, numbered 1 through 23, inclusive, to be answered separately, fully and under oath, within thirty (30) days of service.

PRELIMINARY STATEMENT

These interrogatories are deemed continuing. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure and applicable law, if any information sought by said interrogatories is not learned until after they are answered, or if any answers for any reason should later become incorrect, there shall be a continuing duty on the party answering said interrogatories to supplement or change answers previously submitted.

DEFINITIONS

1. The term "document" as used herein means and includes, without limitation, all writings of any kind, including the originals and all non-identical copies or drafts, whether different from the original by reason of any notation made on such copy or draft or otherwise including, without limitation, correspondence, memoranda, notes, diaries, statistics, letters, e-mail, electronic computer files, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, interoffice communications, offers, notations of any sort of conversation, telephone calls, meetings or other communications, bulletins, printed matter, computer print-outs, teletypes, facsimiles, invoices, work sheets and all drafts, alterations, modifications, changes, and amendments of any of the foregoing, graphic or aural wris, records or representations of any kind including, without

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limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings, motion pictures; and electronic, mechanical or electric records or representations of any kind including, without limitation, tapes, cassettes and disc recordings, and writings and printed material of every kind, whether or not the document is out of your possession, custody or control.

2. The term "correspondence" as used herein is defined to mean any tangible object that conveys information or memorializes information that was conveyed in tangible or oral form including, but not limited to, writings, letters, memoranda, reports, notes, telegrams and interoffice communication.

3. The term "relating to" as used herein is defined to mean evidencing, referring to, pertaining to, consisting of, reflecting, concerning, or in any way logically or factually connected with the matter discussed.

4. The phrase "describe and explain" and the term "state" as used herein are intended to and shall be interpreted to request a full and fair statement of the fact or matter being described and explained, including a statement of all facts, statements, events and circumstances necessary to understand and evaluate the fact or matter being described and explained.

5. The term "identify" as used in each of the following Interrogatories requesting an identification of documents is intended to be interpreted to request and require:

- A. The date of the document;
- B. The originator of the document;
- C. The type of document;
- D. The addressee of the document, if any;
- E. Identification of persons to whom copies of the documents were furnished;
- F. Details as to the custody of the document on the date the Interrogatories are answered;
- G. Specific page numbers where the information requested may be found, if appropriate; or, alternatively, documents may be identified by numbering each such document and referring to the number in the answer and providing a true copy of each such numbered document with the Answers to Interrogatories.

6. The term "identify" as used in each of the following Interrogatories requesting the identification of persons is intended to be interpreted to request and require for each witness known:

- A. The full name of the individual;

- B. The last known address and phone number of the individual;
- C. The last known place, address and phone number of employment of the individual;
- D. The substance of the witness' knowledge or information relating to the information requested.

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT

(If answering for another person or entity, answer with respect to that person or entity, unless otherwise stated.)

1. What is the full name and Florida address of the person answering these interrogatories, and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?
2. Describe financial assets that are under your control, directly or indirectly, including interests in corporations or other business entities.
3. Describe which financial assets listed in your answer to Interrogatory #2 that are located outside the 50 states of the United States and where they are located.

4. Describe your net worth, including income and expenses for 2005, 2006, 2007, and 2008.
5. Describe any real property in which you have a total or partial ownership interest, either directly or indirectly.
6. Describe which real properties listed in your answer to Interrogatory #5 are located outside the 50 United States and where the properties are located.

7. Describe any transfer of assets under your control, either directly or indirectly, to locations outside the 50 United States in 2005, 2006, 2007, and 2008.
8. Describe, with specificity, your travel to locations outside the 50 states of the United States in 2005, 2006, 2007, and 2008, including your dates of travel, location to which you traveled and persons that accompanied you in each such travel.
9. List each telephone number used by you or your assistants to call minor females directly, or indirectly, for the purpose of scheduling a massage to take place at your house located at 358 El Brillo Way, West Palm Beach (includes landlines, cell phones, and private jet or airplane lines). For each cell phone, list the provider.

10. List the last known name, address, and telephone numbers of all persons that may have any knowledge about any of the allegations in the Complaint, including, but not limited to, friends, acquaintances, employees, or others to whom you have spoken about the subject matter which forms the basis of this Complaint or who have observed such activity.
11. Have you heard or do you know about any statement or remark (verbal or written) made by or on behalf of any party to this lawsuit, other than yourself, concerning any issue in this lawsuit? If so, state the name and address of each person who made the statement or remark, the name and address of each person who heard or read it, and the date, time, place and substance of each statement or remark.
12. Do you intend to elicit testimony of witnesses other than Plaintiff regarding any statements she has ever made? If so, what statements do you intend to produce through testimony? Through which witness do you intend to elicit such statement? And for what purpose do you intend to admit such statement?

13. Are you transferring, or do you plan to, or might you transfer money or assets out of the country during the course of this litigation?
14. Describe each property owned by you, including location, approximate value, and whether there is a mortgage on the property and the amount of any such mortgage.
15. Describe with specificity the amount of money available to you in cash or that can be readily liquidated as such. Include the bank, financial institution, holding company, or other location of this money and the name on the account.

16. State with as much specificity as possible when you met the Plaintiff, and include in your answer the following: (a) the circumstances and location of how and where you met, (b) describe the nature of your relationship; (c) describe how many occasions she was with you at your residence located at 358 El Brillo Way in Palm Beach, Florida.

17. Provide the names, addresses, and phone numbers of all your current accountants, financial planners or money managers handling, or assisting in the handling, of your money or assets.

18. Did you ever ask the Plaintiff to introduce you to minor females and/or to bring minor females to your house in Palm Beach, Florida and if so, when did this occur, and what was she asked by you to do, and what did you tell her about the reason for her to bring these other minor girls?

19. Did you ever engage in sexual activity of any kind whatsoever with the Plaintiff, and include in your answer what type of sexual activity took place, where it took place, and the dates or general timeframe when this activity occurred.
20. Were there parameters or instructions by you to the Plaintiff as to the types of girls to bring to your Palm Beach, Florida house, including age range, what they would be asked to do, body type or socio-economic background?
21. Describe any words or actions that you made to assure the Plaintiff that sexual activity with you was proper or appropriate?

22. Describe what age you thought the Plaintiff was when you first had sexual activity with her, including your reasons for that belief.

23. State the facts upon which you rely for each affirmative defense in your answer.

I have read the foregoing Answers to Interrogatories and do swear that they are true and correct.

Jeffrey Epstein, Defendant

STATE OF FLORIDA :
: : ss.
COUNTY OF _____ :

The foregoing instrument was acknowledged before me this _____ day of _____, 2008, by JEFFREY EPSTEIN, who is personally known to me or who has produced _____ as identification
and who did _____ did not _____ take an oath.

My Commission Expires:

Signature of Acknowledger

Typed/Printed Name of Acknowledger

Title or Rank

Serial Number, if any

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the above and foregoing has been provided via United States mail to the following addressees, this 23 day of March, 2009.

Robert D. Critton, Jr., Esquire
Michael J. Pike, Esquire
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515 North Flagler Drive
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Respectfully Submitted,

THE LAW OFFICE OF BRAD EDWARDS &
ASSOCIATES, LLC

By:



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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV- 80893 – MARRA/JOHNSON

JANE DOE,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**DEFENDANT EPSTEIN'S ANSWER & OBJECTIONS TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES (dated 03/23/09)**

Defendant, JEFFREY EPSTEIN, ('EPSTEIN"), by and through his undersigned attorneys, serves his answers to Plaintiff's First Set of Interrogatories, dated March 23, 2009. Rules 33 and 26.1, Fed.R.Civ.P. (2009), attached hereto.

Certificate of Service

WE HEREBY CERTIFY that a true copy of the foregoing has been sent via U.S. Mail and facsimile to the following addressees this 18 day of May, 2009.

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Co-counsel for Plaintiff

Respectfully submitted,

By: _____

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(Counsel for Defendant Jeffrey Epstein)

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DEFENDANT'S ANSWERS TO FIRST SET OF INTERROGATORIES

Interrogatory No. 1. What is the full name and Florida address of the person answering these interrogatories, and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?

Answer: Jeffery Epstein, Defendant
358 El Brillo Way, Palm Beach, Florida

Robert D. Critton, Jr., Attorney for Defendant (if RDC only answers "RDC")
515 N. Flagler Drive, Suite 400
West Palm Beach, FL 33401 (objections other than constitutional, are made by RDC on behalf of Defendant)

Interrogatory No. 2. Describe financial assets that are under your control, directly or indirectly, including interests in corporations or other business entities.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 3. Describe which financial assets listed in your answer to interrogatory #2 that are located outside the 50 states of the United States and where they are located.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under

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these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 4. Describe your net worth, including income and expenses for 2005, 2006, 2007 and 2008.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 5. Describe any real property in which you have a total or partial ownership interest, either directly or indirectly.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence.

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Interrogatory No. 6. Describe which real properties listed in your answer to interrogatory #5 are located outside the 50 United States and where the properties are located.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 7. Describe any transfer of assets under our control, either directly or indirectly, to locations outside the 50 United States in 2005, 2006, 2007 and 2008.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 8. Describe, with specificity, your travel to locations outside the 50 states of the United States in 2005, 2006, 2007 and 2008, including your dates of travel, location to which you traveled and persons that accompanied you in each such travel.

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Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 9. List each telephone number used by you or your assistants to call minor females directly, or indirectly, for the purpose of scheduling a massage to take place at your house located at 358 El Brillo Way, West Palm Beach (includes landlines, cell phones, and private jet or airplane lines). For each cell phone, list the provider.

Answer: Defendant asserts specific U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

Interrogatory No. 10. List the last known name, address and telephone numbers of all persons that may have any knowledge about any of the allegations in the Complaint, including, but not limited to, friends, acquaintances, employees, or others to whom you have spoken about the subject matter which forms the basis of this Complaint or who have observed such activity.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as

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guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence. The scope of the information is so overbroad that it also includes information that is attorney-client and work-product privileged.

Interrogatory No. 11. Have you heard or do you know about any statement or remark (verbal or written) made by or on behalf of any party to this lawsuit, other than yourself, concerning any issue in this lawsuit? If so, state the name and address of each person who made the statement or remark, the name and address of each person who heard or read it, and the date, time, place and substance of each statement or remark.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence. The scope of the information is so overbroad that it also includes information that is attorney-client and work-product privileged.

Interrogatory No. 12. Do you intend to elicit testimony of witnesses other than Plaintiff regarding any statements she has ever made? If so, what statements do you intend to produce through testimony? Through which witness do you intend to elicit such statement? And for what purpose do you intend to admit such statement?

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as

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guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence. Additionally, work-product and attorney-client.

Interrogatory No. 13. Are you transferring, or do you plan to, or might you transfer money or assets out of the country during the course of this litigation?

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 14. Describe each property owned by you, including location, approximate value, and whether there is a mortgage on the property and the amount of any such mortgage.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence.

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Interrogatory No. 15. Describe with specificity the amount of money available to you in cash or that can be readily liquidated as such. Include the bank, financial institution, holding company, or other location of this money and the name of the account.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 16. State with as much specificity as possible when you met the Plaintiff, and include in your answer the following: (a) the circumstances and location of how and where you met (b) describe the nature of your relationship, (c) describe how many occasions she was with you at your residence located at 358 El Brillo Way in Palm Beach, Florida.

Answer: Defendant asserts specific U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

Interrogatory No. 17. Provide the names, addresses, and phone numbers of all your current accountants, financial planners or money managers handling, or assisting in the handling, of your money or assets.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions

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regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 18. Did you ever ask the Plaintiff to introduce you to minor females and/or to bring minor females to your house in Palm Beach, Florida and if so, when did this occur, and what was she asked by you to do, and what did you tell her about the reason for her to bring these other minor girls?

Answer: Defendant asserts specific U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

Interrogatory No. 19. Did you ever engage in sexual activity of any kind whatsoever with the Plaintiff, and include in your answer what type of sexual activity took place, where it took place, and the dates or general timeframe when this activity occurred.

Answer: Defendant asserts specific U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

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Interrogatory No. 20. Were there parameters or instructions by you to the Plaintiff as to the types of girls to bring to your Palm Beach, Florida house, including age range, what they would be asked to do, body type or socio-economic background?

Answer: Defendant asserts specific U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

Interrogatory No. 21. Describe any words or actions that you made to assure the Plaintiff that sexual activity with you was proper or appropriate?

Answer: Defendant asserts specific U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

Interrogatory No. 22. Describe what age you thought the Plaintiff was when you first had sexual activity with her, including your reasons for that belief.

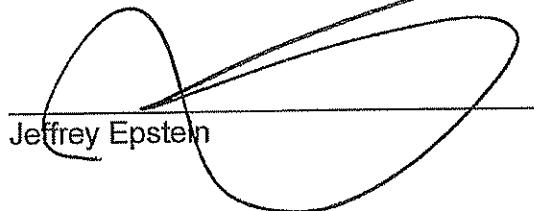
Answer: Defendant asserts specific U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

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Interrogatory No. 23. State the facts upon which you rely for each affirmative defense in your answer.

Answer: Defendant is asserting specific legal objections to the interrogatories as well as his U.S. constitutional privileges. I intend to respond to all relevant questions regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any questions relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. In addition to and without waiving his constitutional privileges, Defendant objects as the interrogatory is so overbroad and, thus, seeks information that is neither relevant to the subject matter of the pending action nor does it appear reasonably calculated to lead to the discovery of admissible evidence. No answer has yet been filed, so not applicable (RDC)

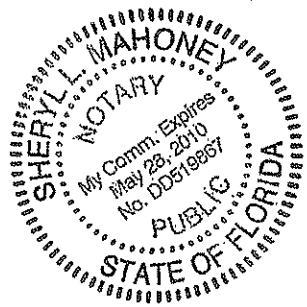
I have read the foregoing answers to Interrogatories and do swear that they are true and correct.



Jeffrey Epstein

STATE OF FLORIDA)
) ss
COUNTY OF PALM BEACH)

SWORN TO AND SUBSCRIBED before me this 18 day of May, 2009 by
Jeffrey Epstein, who is personally known to me or has produced the following
identification _____ which is current or has been issued within
the past five years and bears a serial or other identifying number.



Sherryl L. Mahoney
Print Name

Sherryl L. Mahoney
Signature
NOTARY PUBLIC - STATE OF FLORIDA

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Commission Number:
My commission expires:

(Notary Seal)