

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY,
FLORIDA

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

SCOTT ROTHSTEIN, individually, and
BRADLEY J. EDWARDS, individually,

Defendants/Counter-Plaintiff.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
MOTION TO COMPEL AUDIO RECORDING**

Plaintiff/Counter-Defendant, Jeffrey Epstein ("Epstein"), moves to compel Defendant/Counter-Plaintiff Bradley J. Edwards ("Edwards") to produce the April 7, 2011, audio recording of the telephone interview of Virginia Roberts, and in support thereof, states:

Introduction

Epstein requests this Court to compel Edwards to produce the audio recording of the telephonic interview of Virginia Roberts taken April 7, 2011. Pursuant to the "best evidence" rule, the audio recording must be produced. Epstein appropriately requested the audio recording and Edwards has failed to timely produce it.

Epstein's 2011 Discovery Request for Production of Audio Recording

1. On May 17, 2011, Edwards, in support of his Motion for Leave to Amend to Assert a Punitive Damages claim, filed the transcript of an April 7, 2011, telephonic statement of

Virginia Roberts, a copy of which is attached as **Exhibit A**. The transcript indicates that Ms. Roberts was being recorded. *Id.*

2. The audio recording should have been produced in response to Epstein's December 9, 2011, Request for Production. In that request, Epstein asked Edwards to produce, "Witness statements you intend to use in this case." **Exhibit B**, Request No. 7. "Documents" were defined to include "recording of sound." *Id.*, Instruction No. 7. Although just a few months before the Request was served Edwards filed the transcript of Ms. Roberts' telephonic statement on which he relied and in fact used in this case, Edwards responded "None" to the request. **Exhibit C**, Request No. 7.

**This Court's Recent November/December 2017 Rulings
Prompted a Second Request for the Audio Recording**

3. Undersigned counsel appeared in this case on November 1, 2017. At the November 29 and December 5 and 7, 2017, hearings, the Court made rulings that impacted how this matter will be tried. In addition, during those hearings, Edwards' counsel stated that he would be calling Virginia Roberts, an alleged victim of Epstein but not one of Edwards' three clients (E.W., L.M. or Jane Doe), to testify live at trial.

4. As a result, on January 17, 2018, Epstein's counsel's office made a request to Edward's counsel's office for the audio tape of Virginia Roberts' April 7, 2011, telephonic statement. **Exhibit D**. Edwards' counsel's office has ignored this request.

5. Furthermore, Edwards' Second Amended Exhibit List, No. 106 identifies "**Statements**, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto." **Exhibit E**, No. 106. While Ms. Roberts' April 7, 2011, telephonic statement was used in this case, Edwards has not produced the audio portion.

6. Epstein's counsel was not present during Ms. Roberts' April 7, 2011, telephonic statement. Furthermore, from the face of the written transcript, it cannot be determined whether the statement was given under oath, nor does the transcript identify who transcribed it.

Florida Evidence Code Requires Production by Edwards of the Best Evidence

Section 90.502, Florida Statutes, of the Florida Evidence Code provides that "an original writing, recording or photograph is required to prove the contents of the writing recording, or photograph." *See also Lawrence v. State*, 632 So. 2d 1099, 1100 (Fla. 1st DCA 1994) (holding that a tape recording, despite an available transcript and no dispute as to the tape's audibility, was still the best evidence of the tape's contents).

Because the audio recording is the best evidence, is in Edwards' possession and properly requested by Epstein, Edwards should be compelled to produce the audio recording. *See Duggan v. State*, 189 So. 2d 890 (Fla. 1st DCA 1966) ("tape recordings" of written transcripts of tape recordings were the best evidence).

Accordingly, Epstein respectfully requests that the Court compel Edwards to produce the audio portion of Virginia Roberts' April 7, 2011, telephonic statement.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on February 15, 2018, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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EXHIBIT A

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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

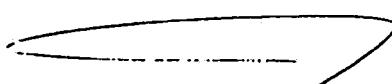
SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually,
and L.M., individually,

Defendants.

NOTICE OF FILING

COMES NOW the Defendant/CounterClaimant, BRADLEY EDWARDS, by and through his undersigned counsel, and hereby files the attached transcript of the telephone interview of Virginia Roberts to supplement the proffer made in support of Counter-Claimant's Motion for Leave to Amend to Assert Punitive Damages.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to all Counsel on the attached list on this 17 day of May 2011.



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Notice of Filing Supplement

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PRIVILEGED PURSUANT TO FS 766.205(4) and/or WORK PRODUCT

TELECON

PARTICIPANTS: **JACK SCAROLA**
BRAD EDWARDS
VIRGINIA ROBERTS

RE: **Edwards adv. Epstein**
291874

DATE: **April 07, 2011**

JS: Virginia, Jack Scarola and Brad Edwards

BE: Hi Virginia.

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

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

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

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

V: That's correct.

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

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

V: Virginia Louise Roberts. That's my maiden name. My married name is Virginia Louise [REDACTED].*

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

V: [REDACTED].*

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

V: I live in Australia.

JS: And how long have you resided in Australia.

V: This is my 19th year.

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

V: That is correct, yes.

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

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

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

V: That's correct.

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

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

JS: When you say that the room was hidden, Virginia, how was the room concealed?

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

JS: When you say...

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

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

V: August 9th, 1983

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

V: I've got it written down. It's like - I'm not good with math – hold on – I thought I wrote it down but I didn't. I'm not too sure, I think it was 1998 off the top of my head and around June of 1998, I would say as I was turning 16 at the end of the summer.

JS: Alright. You talked about the room where Jeffrey had the pornographic photographs. Did you actually see that room on the occasion of your first visit there?

V: No, I got to see that room a few visits after but I was just trying to describe that room to you guys so you knew exactly what room I was talking about.

JS: Another question for you, and I don't mean to be prying into your personal life, and if I ask you any questions at all that you're uncomfortable answering, then you just tell me that and we'll move on, because I appreciate your cooperation and the last I thing I want to do is impose upon that cooperation, but can you tell us please just generally what kind of sexual experience you had had prior to this confrontation with Jeffrey?

V: Yeah, sure. A close family friend has sexually abused me, and I was on the streets at 13 years old. I was picked up by a 67 year old man named Ron Eppinger who did exactly what Jeffrey did with me abuse and violate my youthfulness & I was with him for 6 months. So, he was gone and then I had this boyfriend who was like my school friend from young days but we just kept in contact with each other and we were on and off constantly, and that was Tony Figeroua, and there was also another younger guy was near my age, Michael, I can't remember his last name, but yeah, there, I mean, there wasn't like a string of men or anything, but there was Ron, like I told you, and he was the first guy expecting me to do so-called disgusting affairs. Jeffrey actually knew Ron, which was quite weird when I told Jeffrey the story about Ron, and Jeffrey had actually met him, and yeah. Anyway, just another story, and yeah, there were a couple of men, but that gives you an idea.

JS: Now when you described the photographs in the room as pornographic, tell me just a little bit about the photographs, if you would please? First, how many of them were there?

V: At least 100, and like I said, they covered the room from the ceiling, not the ceiling but from the top of the edge of the wall to the bottom of the floor. I want to say at least a hundred, even more, there could have been more in the boxes. Some of them were A4 photographs, like the large size, some of naked women posing, you know, positions, sexy positions. Others were, you know, some girls had bikinis on, and it wasn't so pornographic, but it was all women, and it was all in a sexual nature.

JS: Were there photographs where more than one person appeared?

V: Oh yeah, plenty of them. There were lots of naked photographs, I mean I was just trying to give you a visual range. There was anything from 5x6s to 4x8s to 8x4s. Some of them

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

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

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

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

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

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

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

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

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

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

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

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

JS: What is your Dad's full name?

V: Sky William Roberts.

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

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

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

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

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

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

JS: Just for the record, neither Brad, nor I, nor anyone representing that they have anything to do with us has made any promises to you. Is that correct?

V: That is correct. I'll tell you, since this is our first conversation, that nobody has made me feel like I've been bribed or bought or had to say anything. I've told you anything that I know from my own self, not some things somebody told me. If anything, Brad's been extra careful not to tell me anything and let me do all the talking, so it's quite opposite I think.

JS: Alright. Let's get back then to the story of your relationship with Jeffrey, and we've talked about your first encounter with him and how it evolved from that into your full time employment with Jeffrey, but what were you doing at Mar-a-Lago before you quit Mar-a-Lago?

V: I was just a locker room attendant and sometimes I did babysitting for the rich and famous. So, I wasn't anything big. I worked in the spa area. That's why I was studying anatomy, because I was really really interested in becoming a massage therapist, and at the locker room, I didn't do much. I mean I was making tea for a living, I would, you know, make sure the toilet paper had a little triangle in it after everybody went to the toilet, or wipe down the water from the basin, you know, it was a very easy peasy job.

JS: Did you get that job through your Dad?

V: Yes, my Dad got me the job.

JS: Ok, and you were only 15 years old at the time, were they aware of how old you were at Mar-a-Lago?

V: Of course, definitely. We had to go through extensive, you know, we even had to get drug tested and id-test and so on and so forth. I mean, Mantas (?) is very strict on employment, yeah, everybody knew.

JS: Ok. Was there ever any conversation with Ghislaine about how old you were before you were taken to Jeffrey's mansion?

V: No. She didn't ask me how old I was from the start, but when I did get to Jeffrey's mansion, it was discussed how old I was.

JS: With whom?

V: During the entire hour of what I call the legitimate massage I was giving him, it was cat and mouse games getting information from me to find out who I am, am I a willing participant in these kind of things, and how would I react if they were about to take the next step. But they got information off of me, they got my age, they got my, a little bit of my history so they knew I was, you know, not very stable at home, and they knew that,

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

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

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

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

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

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

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

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

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

JS: Yes, I was talking about a street. Royal Palm Drive is on the island of Palm Beach, and it's a street that is lined with large royal palm trees, and I'm wondering if this was an apartment on the island or was this an apartment out west of town...

V: No, it was actually in Royal Palm Beach, not on the island.

JS: Alright.

V: I would be driven, it was closer to my family than it was closer to him. I wanted to be close enough to everybody else so that when I was in town, I could just go see them quickly.

JS: Ok. So we're not talking about Royal Palm Boulevard. We're talking about the town of Royal Palm west of town. Jeffrey got you an apartment out there.

V: That's correct.

JS: When he was in Palm Beach, you were generally not staying at the mansion, you were staying at the apartment that he got for you out west of town.

V: That's correct.

JS: Ok.

V: I mean then there was times, I don't wanna say that every time I stayed at my apartment. There was times we'd fly back from some city maybe too late at night to really want to go back home, so you know, it's like 12:00 at night or 1:00 in the morning. I was just staying in the yellow room, or something like that; one of the guest rooms in Palm Beach. But majority of the time, I would definitely want to get back to my own apartment.

JS: Alright. What were the general hours of your full time employment when ...?

V: There was not set hours. It wasn't like logging, and you know, hitting the shift button, nothing like that. The way I would get paid would be, ok, if I was in Palm Beach, I would get \$200 an hour to massage Jeffrey or some of his friends and then go home. So it would be like that. If I was traveling with him, it would be per massage, so I would be getting paid per day. So I wouldn't be getting paid on an hourly rate. He wouldn't say ok, today you're going to work for me from 7:00 in the morning until 8:00 at night. It never like that. I was on call all the time.

JS: When you were here in Palm Beach, were you actually getting paid only for the time spent massaging Jeffrey or were you getting paid from your arrival at his house until you left the house?

V: From the time the massage started.

JS: From the time the massage started. Ok.

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

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

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

JS: Did that start here in Palm Beach County?

V: It did. The first one did.

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

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

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

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

JS: Was there ..

V: There was always payment from Jeffrey.

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

V: In a roundabout way, yes. In so many ways, Jeffrey really really had to train me, and that was why Ghislaine said that she and Jeffrey enjoyed me so much was because they never really had to speak much to me to tell me what they wanted me to do. You know, I wasn't waiting for you know, their directions. Jeffrey would tell me to go give an erotic massage to friends. He wouldn't give me much detail about it, but he would say to treat them like you treat me.

JS: Did he refer to it as an erotic massage or are those your words?

V: Erotic massage is my words. That's exactly what it was, but he would tell me to treat them how he wanted it, so I'd do what he wanted without having to say to me words more. I mean, I complied with what he wanted because it was somewhat of a, I don't know, I don't know how to say it, it was just very mindboggling how I let him have so much control or power over me basically. The massages would be routine to what Jeffrey wanted with my so called new clientele, and with their own words would ask me to provide them with sexual pleasure after the massage.

JS: Did you ever report back to Jeffrey about what happened when you provided massages to his friends?

V: Of course, of course, and I knew that his friends were reporting back to him as well because there were times where he would instigate conversation by saying you know, so and so had a great time, you did wonderful, you know so and so gave me a call and told J.E how it went ...

JS: Did Jeffrey ever elicit details from you? "Tell me what happened, describe in detail what went on?"

V: No, but he would have a laugh, he had a laugh with me a few times about some of their different mannerisms, I guess you would say, like some of them, one guy had a foot fetish and that was really weird and I mentioned it to Jeffrey, and we would have a laugh over it. He didn't want to know details. He wasn't asking me "so tell me what did you guys do exactly." No, he just basically gave me a slap on the back and said, you know, good job. And we had some kind of conversation about it. I can't recall any conversation off the top of my head. I really don't know one. It's been that long. But yeah, we did talk about it briefly.

JS: Can you give me an estimate as to the number of friends for whom Jeffrey provided and paid for your services?

V: There was about, you know, I don't know, 8 guys possibly.

JS: And are you able to name those people for me?

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

JS: Ok, Virginia.

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

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

V: Thank you so much, Jack.

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

V: Ok.

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

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

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

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

JS: How did you travel?

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

JS: commercial flight?

V: Yes. Just a normal flight, an e-ticket.

JS: Like the rest of us common folk.

V: But when I was traveling with Jeffrey, the majority of the time would be on the black jet.

JS: Now, when you say there would be times when you would travel by yourself because he was sending you somewhere, tell me about that. How did that come about?

V: So, one of his colleagues would be at the Caribbean or Santa Fe or even New York, or wherever, and he would call me up on those days where I am not working with him or in Palm Beach with him, and he would ask me to get on the next plane to so and so and go meet so and so, and that's when I would take e-tickets. His secretary or special assistant, whatever, would organize it for me and give me the details and I would just walk up the line and they'd let me right through.

JS: Can you give me any ideas as to how many times it happened that Jeffrey would send you off to meet some friend of his at some location outside of Palm Beach?

V: How many times it happened? I'm not too sure. Probably about 10-15 times.

JS: Ok. And on those occasions, how much time would you spend with one of Jeffrey's friends when you were sent to a location that you would have to travel to?

V: Only a couple of days. Only 2 days, that's it.

JS: And how were you paid for those trips?

V: I would be paid in cash upon my arrival back with Jeffrey. So, whenever I was back with Jeffrey, he would count up how many days I've had, sometimes give me even more than what I deserved, not deserved, but what I earned and give me a little extra.

JS: Was there a daily rate for those trips or was that per massage also?

V: Per-massage. With Jeffrey, I would be honest. I wouldn't tell him I did 15 massages if I didn't. He knew he could trust me. He could always come back to the other person that he sent me to give massages and ask them as well, so you know, it was always by per massage.

JS: Alright. When we've been talking about massages, tell me exactly what it is we're talking about when we speak about massages.

V: Same thing I would do to Jeffrey. Again, it would start out as a massage, which would start with them being naked, and me giving him a legitimate massage to begin with, so

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

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

V: That is accurate.

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

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

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

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

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

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

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

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

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

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

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

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

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

JS: Who gave you those criteria?

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

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

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

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

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

JS: Let me see if we can try to narrow it down a little bit. Is there any doubt in your mind that it was more than 10?

V: Yes, there was definitely more than 10.

JS: Ok, what I want you to do is to give me the highest number that you are comfortable in saying there were definitely more than X number of underage girls that I know Jeffrey Epstein engaged in sex with while I had a relationship with him. How would you fill in that blank? Definitely more than how many?

V: I'd say definitely more than a hundred.

JS: Alright. Did Jeffrey ever help to pick out your clothes?

V: Oh yes. I mean he wasn't out to dress me like a porn star or anything. He would always dress me very classy, but we'd just go shopping all the time together.

JS: Did he ever express any style preferences in terms of how he wanted you to dress? Besides dressing classy, I'm, you know, any other suggestion to you about how he wanted you dressed?

V: He didn't, like I said, wasn't trying to dress me in any prostitute way or anything like that. It was nice, classy outfits I was wearing like Gucci, Dolce Gabbana, Chanel, things like that. He was buying me a lot of very, very nice clothing. It was provocative. I mean I was wearing miniskirts, and tight short shorts and little shirts that showed my belly and my cleavage and everything, but they were very expensive clothes.

JS: Was there every any dress up role playing?

V: Yes. There was. Lots of it. Jeffrey loved the latex outfits Ghislaine had for us girls, he had bondage outfits, he had all different kinds of outfits, but his favorite was the schoolgirl.

JS: Tell me about that.

V: Well, you know, Ghislaine would take me to dress me up to surprise J.E or Jeffrey would ask me to get dressed up, that would include wearing a tiny little skirt with nothing underneath, a white collared shirt that you would be wearing to school with a tie in it, tied up in a bow, my hair in pigtails, stockings on up to my knees, and I would go in there and act like a kid and we'd do role playing sexing.

JS: Did Jeffrey ever brag to you about the age of any of the girls with whom he had relationships?

V: Yes, he did. He did all the time. The worst one that I heard from his own mouth was this pretty 12 year old girls he had flown in for his birthday. It was a surprise birthday gift from one of his friends and they were from France. I did see them, I did meet them. Jeffrey bragged afterwards after he met them that they were 12 year olds and flown over from France because they're really poor over there, and their parents needed the money or whatever the case is and they were absolutely free to stay and flew out. Those were the worst ones. He was constantly bragging about girls' ages or where he got them from or their past and how terrible their past was and good he is making it for them.

JS: Where were the 12 year old girls flown to from France? Where did they come to?

V: Palm Beach.

JS: And were they flown in on Jeff's private plane or did they get transported?

V: No. They were transported by somebody else.

JS: Ok. Was the sexual activity that went on on the airplane conducted in such a way so that any of the crew was aware of what was going on?

V: They were told to knock if they had to come out, if the crew had to come out. They were told, you know, to come out as little as possible, so they weren't out there hanging out watching everything, no, but it doesn't take an idiot to put two and two together to say well there's a whole bunch of half dressed teenagers on board with this old man who is constantly being massaged by them and he wants me to keep the door shut for what reason? I mean, only they could put that together, but yeah, they knew.

JS: Did Mr. Epstein ever talk to you about people of power and influence owing him favors?

V: He would laugh about it, you know, I never really knew what to take serious from Jeffrey because he was such a funny character at times. You never knew if what he was saying was true or not. Yeah, lots of people owed him favors from what he told me. He's got everybody in his pocket, and he would laugh about he helps people for the sole purpose in the end they owe him something. That's why I believe he does so many favors in the first place.

JS: When and how did you first become aware that Mr. Epstein was in trouble with the law?

V: I was first informed by, I think someone from the FBI called me first and started to ask me questions, and I started to answer the questions but then fear took over, and I just said look, I don't know what's going on, I've got a young family that I don't want to risk, you know, please don't bother me about this again, and it was real short simple conversation, and within a week or 2, I had gotten a call from Jeffrey's attorney, and then a week later, Jeffrey himself.

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

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

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

V: Correct.

JS: You were contacted by telephone?

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

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

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

JS: OK.

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

JS: Ok.

V: Sorry go on.

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

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

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

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

JS: What do you remember about that conversation?

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

JS: Alright.

V: I can't remember which one it was. I want to say Bill Riley is the good one.

JS: Alright, so either Bill Riley or a Mr. Goldberger or both of them contacted you, and what do you remember about that?

V: I don't know if it was the same guy who contacted me that week later who put me in touch with Jeffrey. I think he was on the phone and he put speakerphone on with Jeffrey. So he connected me with Jeffrey. I don't know if it was the same guy or different, but I definitely know that Bill Riley was the first guy to contact me. I'm pretty sure about that.

JS: Ok. Tell me about that conversation.

V: He asked me what I knew about what's going on with Jeffrey, and apparently, there was an investigation being held about some of the girls who had come out and said that Jeffrey had sexual contact with them under the age of a minor and that he was discrediting lot of these girls and making them out to be drug addicts and prostitutes and what have you so they wouldn't be looked upon as worthy in the court's eyes so to speak. And you know, he told me in the first five minutes that, you know, if I stay quiet, that "I'll be looked after". And that was the exact way it was said. It wasn't like you know, I'm gonna pay you a zillion dollars or anything if you be quiet, but if I stay quiet, I would "looked after". And I remember saying I don't want any part to do with this. You know, this is not something I want to be a part of, I've got a young family. I wish the best for everybody in this, you know, take care kind of thing. A week later, I was called after the hearing by one of Jeffrey's lawyers. I can't tell you exactly which one it was but he had Jeffrey on the other line and he connected Jeffrey and I, and Jeffrey tried to make some simple conversation, "How are you? How have things been?" You know what I mean, catching up.

JS: Do you know if the lawyer, did the lawyer stay on the line while Jeffrey was speaking to you?

V: I'm pretty sure he did. That's why I think Jeffrey was on speaker phone because it sounded a lot different, and I was never taken off the line to begin with or connected to another line, so I was pretty sure Jeffrey was on speaker phone and the lawyer was making the call. After the simple conversation, it led to what was going on again and you know, Jeffrey couldn't believe it. You know, he thought he helped all these girls out. He didn't think he was wrong in any circumstance here at all. A lot of these girls were drug addicts and just after drug money. You know, he was really putting down these women or these girls I should say, not giving them the credit they deserved, and then he exactly repeated what the lawyer said the week before is that he would look after me if I stayed quiet, and if I need any help, you know, his lawyers would represent me and he would get legal help for me, whatever I need, he would do, and I told him exactly, I said, "Jeffrey, I'm the mother of two children at that stage. I'm away from everything there, I don't want to be a part of it. I'm not going to speak to anybody and I don't want to speak to anybody, I don't want to be involved." That was the last time I heard from him. And the

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

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

V: That's correct.

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

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

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

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

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

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

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

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

V: Thanks Jack.

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

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

JS: Where was here?

V: He told me a long time ago that everyone owes him favors. They're all in each other's pockets.

JS: When you say you asked him why is Bill Clinton here, where was here?

V: On the island.

JS: When you were present with Jeffrey Epstein and Bill Clinton on the island, who else was there?

V: Ghislaine, Emmy, and there was 2 young girls that I could identify. I never really knew them well anyways. It was just 2 girls from New York.

JS: And were all of you staying at Jeffrey's house on the island including Bill Clinton?

V: That's correct. He had about 4 or 5 different villas on his island separate from the main house, and we all stayed in the villas.

JS: Were sexual orgies a regular occurrence on the island at Jeffrey's house?

V: Yes.

JS: If we were to take sworn testimony from the people I am going to name, and if those people were to tell the truth about what they knew, do you believe that any of the following people would have relevant information about Jeffrey's taking advantage of underage girls? So I'll just name a name, and you tell me yes if they told the truth, I think they'd have relevant information or no, I don't think they would, or I don't know whether they would or not. Ok? You understand?

V: Yes.

JS: Ok. Les Wexner.

V: I think he has relevant information, but I don't think he'll tell you the truth.

JS: Ok. Alan Dershowitz.

V: Yes.

JS: David Copperfield.

V: Don't know.

JS: Tommy Matola.

V: Don't know.

JS: Prince Andrew.

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

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

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

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

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

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

V: [REDACTED] *

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

V: Yep that's it.

BE: Thank you Jenna, appreciate it.

V: No problem, Brad.

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

V: Take care Jack. Nice meeting you.

JS: You too.

EXHIBIT B

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION AG
CASE NO. 502009CA040800XXXXMB
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

SCOTT ROTHSTEIN, individually, and
BRADLEY J. EDWARDS, individually,

Defendants/Counter-Plaintiffs.

**PLAINTIFF JEFFREY EPSTEIN'S SECOND REQUEST FOR PRODUCTION TO
DEFENDANT/COUNTER-PLAINTIFF BRADLEY J. EDWARDS**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") hereby requests that Defendant/Counter-Plaintiff Bradley J. Edwards produce for inspection and copying those items requested in Epstein's Second Request for Production within 30 days of service at the offices of Fowler White Burnett P.A., 901 Phillips Point West, 777 South Flagler Drive, West Palm Beach, FL 33401.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by e-mail and U.S. Mail on this 9th day of December, 2011 on: Jack Scarola, Esq., Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Blvd., West Palm Beach, FL 33409; Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401-5012; and Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Blvd., Suite 700, Fort Lauderdale, FL 33301.

2011 DEC 12 AM 10:03
FILED
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CIVIL

FILED

Epstein v. Rothstein and Edwards
Case No. 502009CA040800XXXXMB/Div. AG



Joseph L. Ackerman, Jr.
Florida Bar No. 235954

FOWLER WHITE BURNETT, P.A.
901 Phillips Point West
777 South Flagler Drive
West Palm Beach, Florida 33401
Telephone: (561) 802-9044
Facsimile: (561) 802-9976
Attorneys for Plaintiff Jeffrey Epstein

NOT A CERTIFICATE

DEFINITIONS AND INSTRUCTIONS

1. The term "Edwards," "you" or "your" means the party or parties to whom this Request for Production is addressed, i.e., Defendant/Counter-Plaintiff Bradley J. Edwards, including, all persons acting or purporting to act on his behalf.
2. "Second Amended Counterclaim" means the Second Amended Counterclaim which you served on November 29, 2011 on the Plaintiff/Counter-Defendant Jeffrey Epstein in this action.
3. The term "witness" means any natural person, individual, proprietorship, partnership, limited liability company, corporation, affiliate, subsidiary, association, organization, joint venture, firm, other business enterprise, governmental body, group of natural persons or other entity.
4. The terms "identify," "describe" or "provide" when used with reference to a natural person means:
 - A. the full name, current telephone number(s) and current business and home addresses (or, if the current telephone number and/or current business and home addresses are not known, the last known telephone numbers and/or business and home addresses) of the person. Addresses shall include the street and post office box if known and the city, state, country and zip code;
 - B. the full name and address of each employer, each corporation of which the person is an officer or director, and each limited liability company of which the person is a

manager or a member, each partnership of which the person is a partner, and each other business in which the person is a principal;

C. the person's current (or, if the current is not known, the last known) position, and the position or positions held by the person at the time of the act to which the response to a specific request relates; and

D. such other information as is sufficient to provide full identification of the person:

5. The terms "identify," "describe" or "provide" when used with reference to any entity other than a natural person means:

A. the full name of the entity, the type of entity (e.g., corporation, limited liability company, partnership, etc.), the address of its principal place of business, its principal business activity, the jurisdiction under the laws of which it has been organized and the date of such organization;

B. each of the entity's officers, directors, shareholders, managers, members, partners or other principals;

C. any other available information concerning the existence or identity of the entity.

6. The terms "identify," "describe" or "provide" when used with reference to a document means:

A. the name or designation of the document;

B. the name of the person(s) who participated in the creation of the document;

C. the date of the document;

D. the person or entity to whom the document is addressed (if any) and those to whom any copies of the document were addressed or delivered;

E. a brief description of the contents of the document; and

F. all signatories to the document.

7. "Document" means any agreement, contract, letter, correspondence, memorandum, report, calendar, diary, appointment book, log, record (including business, financial and medical records), ledger, audit, bill, invoice, statement, schedule, recording of sound or photographs, electronic file (whether on disk, tape, drive or otherwise), printout, writing, drawing, sketch, notes (handwritten or otherwise), map, blueprint, e-mail, data compilation, and written or recorded material of any kind and character.

8. "Referring to," "reflecting," "evidencing" or "relating to" means in any way directly or indirectly, concerning, referring to, disclosing, describing, confirming, supporting, evidencing or representing.

9. "And" and "or" shall be construed in the disjunctive or conjunctive as necessary in order to bring within the scope of each request which might otherwise be construed to be outside its scope.

10. "Person" means any individual natural person, partnership, association, firm, limited liability company, corporation, organization, trust, governmental or public entity, and any

of the officers, directors, shareholders, members, managers, partners, agents, employees, assigns or representatives of the same.

11. "Substantiate," "state" or "explain" means to produce documents or things that set forth the circumstances or bases for any belief, contention or position or give information or direction in response to a request.

12. If documents or things that are responsive to all or part of a specific request are not within your custody, possession or control, for each, state when it was last in your custody, possession or control, and why it is no longer in your custody, possession, or control and identify the person(s) that you know has or last had or that you believe has or last had custody, possession or control of such document or thing.

13. If you do not presently have in your custody, possession or control, documents or things that are responsive to a request, include a statement to that effect, and at such time as any responsive document or thing comes into your custody, possession or control, produce same within ten days of its location, and in any event, produce it no less than ten days prior to trial.

14. Except where otherwise stated, the time period for the requests made herein is January 1, 2008 through the present.

REQUESTS

1. Each and every document that tends to support the claim in your Second Amended Counterclaim that you have suffered damage to your reputation as a result of the filing of this action against you.
2. Each and every document that tends to support the claim in your Second Amended Counterclaim that you have suffered damage as a result of interference in your professional relationships.
3. Each and every document that tends to support any claim you are making for special damages, including loss of income; this request specifically shall include, but not be limited to, production of your federal income tax returns for 2007, 2008, 2009, 2010, and records of income in 2011.
4. Each and every document that tends to support the claim in your Second Amended Counterclaim that you have suffered money damages resulting from the loss of the value of your time diverted from your professional responsibilities; this request specifically shall include, but not be limited to, the production of all your time and billing records, calendars and diaries from 2009 through the date on which you respond to this request.
5. Each and every document, including, but not limited to, invoices and statements, that tends to support the claim in your Second Amended Counterclaim that you have paid money or incurred obligations to pay money for your defense in this lawsuit.
6. Each and every document evidencing communications from others with respect to your reputation and standing in the legal community.

7. Witness statements you intend to use in this case.
8. All invoices and statements for legal services and costs incurred for the defense of this action against you.
9. Each agreement or other writing memorializing the arrangement pursuant to which you are receiving legal services for the defense of this action, including but not limited to a retainer agreement with Searcy Denney Scarola Barnhart & Shipley, P.A.
10. Each and every document that tends to show that your reputation has been damaged as a result of your relationship with Rothstein, Rosenfeldt & Adler.
11. Each and every document reflecting gross collections received from your providing services as a lawyer for each of the years 2007, 2008, 2009, 2010 and 2011.
12. Invoices, statements of account or other documents reflecting treatment for any physical or psychological injury you claim to have suffered as a result of this action being brought against you.
13. Each and every document reflecting the method used in calculating your loss of income, whether by wages or other remuneration, for the period you claim to have suffered damages.
14. Each and every document reflecting the method used in calculating your alleged loss of future earning capacity as a direct result of the allegedly wrongful conduct.
15. Each and every document reflecting all lost business opportunities you claim to have suffered between 2009 and the present.

16. Each and every document reflecting the identity of the confidential source(s) listed on your Privilege Log dated February 23, 2011.
17. Each and every document reflecting the legal authority that justifies your refusal to disclose the identity of the person(s) identified as a confidential source in your Privilege Log dated February 23, 2011.
18. All closing statements for all clients who you represented that brought claims against the Plaintiff (and all other documents with respect to such clients), reflecting amounts paid to such clients or to you, your time, referring attorneys and amounts paid to the same, advance costs, and payments to any other person or entity.
19. All records of your contacts with the press or other media outlets.
20. Any agreements and communications relating to agreements or potential agreements for the sale of, development of, or any other transaction relating to, movie, book or other rights that you may or will benefit from which are related to the claims you or your clients brought against the Plaintiff.
21. All documents supporting your alleged belief that law enforcement is still investigating the Plaintiff/Counter-Defendant Jeffrey Epstein, including those reflecting communications with or information received from the government/law enforcement, media, other attorneys, or anyone else from which you claim to form this belief.
22. All documents supporting your claim that "others still persist in prosecuting claims against Jeffrey Epstein."

Epstein v. Rothstein and Edwards
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23. All documents supporting your claims in Paragraphs 9 and 25 of the Second Amended Counterclaim in which you allege the sole purpose of filing civil claims was never to recover monetary damages, that Plaintiff/Counter-Defendant Jeffrey Epstein knew he never suffered monetary damages, and that he knowingly asserted baseless and unsupportable claims, etc.

NOT A CERTIFIED COPY

EXHIBIT C

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendant(s).

12 JAN -9 PM 4:19
SHARON M. DUNN, CLERK
PALM BEACH COUNTY, FL
CIRCUIT COURT
CIVIL A

FILED

PLAINTIFF'S RESPONSE TO REQUEST TO PRODUCE

Defendant/Counterplaintiff, Bradley J. Edwards, by and through his undersigned attorney and pursuant to Rule 1.350, Florida Rules of Civil Procedure, hereby respond to Plaintiff/Counterdefendant, Jeffrey Epstein's, Request to Produce dated December 9, 2011 as follows:

1. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.
2. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.
3. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.

4. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.

5. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.

Invoices reflecting expenses incurred in defense of this lawsuit are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

6. The only responsive documents are:

- the original and amended Complaints in this action
- Epstein's Motion to Depose Rothstein (with attachments and certificate of service) filed in the RRA bankruptcy proceedings
- bankruptcy filings and hearing transcripts all of which are already in the possession of Epstein and his counsel

7. None

8. Invoices reflecting expenses incurred in defense of this lawsuit are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

9. Responsive documents are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

10. None

11. Objection. Overly broad, not reasonably calculated to lead to the discovery of admissible evidence, privileged pursuant to Bradley Edwards' right and the rights of his clients, law partners, and associates to economic privacy, and in some circumstances subject to contractual confidentiality provisions.

12. None

13. Records reflecting the amount of time which Bradley Edwards has been obliged to devote to the defense of Epstein's malicious, abusive, and baseless legal actions against Bradley Edwards are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

14. None

15. Records reflecting the amount of time which Bradley Edwards has been obliged to devote to the defense of Epstein's malicious, abusive, and baseless legal actions against Bradley Edwards are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

16. Objection. Attorney work product privilege

17. Objection. Attorney work product privilege

18. Objection. Overly broad, not reasonably calculated to lead to the discovery of admissible evidence, privileged pursuant to Bradley Edwards' right and the rights of his clients, law partners, and associates to economic privacy, and in some circumstances subject to contractual confidentiality provisions.

19. Objection. Attorney work product privilege except to the extent that Bradley Edwards is identified as a source of information in published reports which are as easily available to Jeffrey Epstein as to Bradley Edwards through internet searches.

20. None

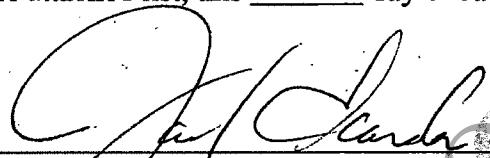
21. None

22. None except to the extent that pending Victims Rights Act proceedings fall within the description of this request. Pleadings in that matter are public records readily available to Jeffrey Epstein.

23. See Bradley Edwards' Motion for Summary Judgment and attachments thereto and all pleadings and filings in the state and federal criminal proceedings against Epstein and in each of the civil claims brought against and settled by him—all of which are already in the possession of Epstein and/or the members of the various law firms who do and have represented him.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Plaintiff(s) Response to Request to Produce

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
Fax and U.S. Mail to all Counsel on the attached list, this 6th day of January, 2012.



Jack Scarola
Florida Bar No.: 169440
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9451
Attorney for Bradley J. Edwards

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Plaintiff(s) Response to Request to Produce

COUNSEL LIST

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Farmer, Jaffe, Weissing, Edwards, Fistos &
Lehrman, PL
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Marc S. Nurik, Esquire
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Joseph L. Ackerman, Jr., Esquire
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West Palm Beach, FL 33401-6170
Phone: (561) 802-9044
Fax: (561) 802-9976

EXHIBIT D

NOT A CERTIFIED COPY

Tina L. Campbell

From: Tina L. Campbell
Sent: Wednesday, January 17, 2018 7:17 AM
To: Chris R. Rodgers
Subject: Epstein v. Edwards
Attachments: Roberts.Virginia 2011-4-7 Telephone Interview.pdf

Hi Chris,

Could you please send me the audio for this telephone interview?

Thank you.



Tina Campbell, CP/FRP
Certified Paralegal

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Blvd., Suite 301
West Palm Beach, FL 33401
office (561) 727-3600 | fax (561) 727-3601 | Email: tina@linkrocklaw.com

This e-mail may contain privileged or confidential information. If it is not meant for you, please delete it and notify us immediately. Please confirm receipt of time sensitive communications because email deliveries may be delayed or unsuccessful. We do not provide tax advice. Our communications may not be relied upon to avoid penalties that may be imposed by the Internal Revenue Service.

EXHIBIT E

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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT,
IN AND FOR PALM BEACH
COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS,
individually, and L.M.,
individually,

Defendants,

COUNTER-PLAINTIFF'S, BRADLEY J. EDWARDS,
SECOND AMENDED EXHIBIT LIST

COMES NOW the Counter-Plaintiff, BRADLEY J. EDWARDS, and hereby files his Amended Exhibit List as follows:

INDEX TO OBJECTIONS

0. No objection	5. Privileged
1. All objections	6. Opinion
2. All objections, except authenticity	7. Hearsay
3. Irrelevant or immaterial	8. Authenticity lacking
4. Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence	9. Other (please identify basis of objection)

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.

Case No. 502009CA040800XXXXMBAG

Counter-Plaintiff's, Bradley J. Edwards, Second Amended Exhibit List

Counter-Plaintiff	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
1.	All applicable criminal statutes.			
2.	All applicable Florida Statutes.			
3.	Photos and information of Jeffrey Epstein's homes, airplanes and automobiles.			
4.	Order confirmation from <u>Amazon.com</u> for purchase of books SM 101: A Realistic Introduction," "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss Abernathy: A Workbook for Erotic Slaves and Their Owners".			
5.	Non-Prosecution Agreement.			
6.	Jane Doe 102 Complaint.			
7.	Messages taken from message pads found at Epstein's home.			
8.	Documents related to Jeffrey Epstein produced by Alfredo Rodriguez.			
9.	Jeffrey Epstein's flight logs.			
10.	Jeffrey Epstein's phone records.			
11.	Sarah Kellen's phone records.			
12.	Jail Visitation Logs.			
13.	Jeffrey Epstein's probation file.			
14.	All probable cause affidavits related to criminal investigation of Jeffrey Epstein.			
15.	Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein.			
16.	Video of Epstein Property Inspection, 01/18/10.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
 Case No.: 502009CA040800XXXXMBAG
 Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

17.	Application for Search Warrant of Jeffrey Epstein's home.			
18.	Complaint Jane Doe v. Epstein and all subsequent Amended Complaints.			
19.	All records of homes, properties, bank accounts and any/ all records related to Jeffrey Epstein's assets.			
20.	Jeffrey Epstein's passport (or copy).			
21.	Jeffrey Epstein's driver's license (or copy).			
22.	List of corporations owned by Jeffrey Epstein.			
23.	Yearbooks of Jane Doe.			
24.	2002 Royal Palm Beach High School Year Book.			
25.	2001 Royal Palm Beach High School Year Book.			
26.	2003 Palm Beach Gardens High School Year Book.			
27.	Affidavit and Application for Search Warrant on Jeffrey Epstein's home (<i>from Palm Beach State Attorney's File, Exhibit #29</i>).			
28.	Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation.			
29.	The Palm Beach State Attorney's Criminal file against Jeffrey Epstein.			
30.	All documents related to Jeffrey Epstein's 6/30/08 conviction.			
31.	Jeffrey Epstein's criminal plea colloquy.			
32.	List of properties and vehicles in Larry Visoski's name.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
 Case No.: 502009CA040800XXXXMBAG
 Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

33.	All of Jeffrey Epstein's Responses to Requests for Production, Requests for Admission, Answers to Interrogatories in this matter, and in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.		
34.	All discovery related responses of Jeffrey Epstein in this matter and in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.		
35.	Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him.		
36.	All Complaints in which Jeffrey Epstein is/was a defendant.		
37.	Jeffrey Epstein's Deposition testimony and discovery responses in this case and in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.		
38.	Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB.		
39.	Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No 502009CA040800XXXXMBAG.		
40.	Any and all newspaper articles, online articles or publications related to Jeffrey Epstein.		
41.	Report and Analysis of Jeffrey Epstein's assets.		

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
 Case No.: 502009CA040800XXXXMBAG
 Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

42.	Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.			
43.	Photos of all of Jeffrey Epstein's properties, cars, boats and planes.			
44.	Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen.			
45.	Documents related to or evidencing Jeffrey Epstein's donations to law enforcement.			
46.	Victim Notification Letter from US Attorney's Office to Victims (CW & SR), 07/09/2008			
47.	Expert Dr. L. Dennison Reed's Report of Victim.			
48.	Palm Beach Police Department Incident Report dated 4/20/06.			
49.	All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein.			
50.	All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein.			
51.	Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs.			
52.	Passenger lists for flights taken by Jeffrey Epstein.			
53.	Letter from Jeffrey Epstein to Alberto Pinto regarding house island project.			
54.	Jeffrey Epstein's bank statements.			
55.	Jeffrey Epstein's tax returns.			
56.	MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez,			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

	Pappas Suat, Jean Luc Brunel and Amanda Grant.			
57.	DVD of plea and colloquy taken on 6-30-08.			
58.	Transcript of plea and colloquy taken on 6-30-08.			
59.	Palm Beach Police Department Incident Report dated 07/25/06 (unredacted)			
60.	No Contact Orders entered against Jeffrey Epstein.			
61.	Criminal Score Sheet regarding Jeffrey Epstein.			
62.	Documents evidencing Jeffrey Epstein's Community Control and Probation.			
63.	Jeffrey Epstein's Sex Offender Registrations (from various states).			
64.	Jeffrey Epstein's Booking photograph.			
65.	CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480.			
66.	List of Jeffrey Epstein's House contacts.			
67.	Documents related to Jeffrey Epstein's investments.			
68.	Letter from Chief Michael Reiter to Barry Krischler.			
69.	Palm Beach Police Department Incident Report dated 07/19/06 (redacted)D			
70.	Letter from Guy Fronstin to Assistant State Attorney, 01/11/06.			
71.	Letter from Guy Fronstin to Assistant State Attorney, 01/13/06.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
 Case No.: 502009CA040800XXXXMBAG
 Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

72.	Letter from Guy Fronstin to Assistant State Attorney, 02/17/06.			
73.	Letter from Guy Fronstin to Assistant State Attorney, 04/06/06.			
74.	Letter from Guy Fronstin to Assistant State Attorney, 04/10/06.			
75.	Letter from Goldberger, 06/22/06.			
76.	All subpoenas issued to State Grand Jury.			
77.	Documents related to the rental of a vehicle for Vanessa Zalis.			
78.	Ted's Sheds Documents.			
79.	Documents related to property searches of Jeffrey Epstein's properties.			
80.	Arrest Warrant of Sarah Kellen.			
81.	Police report regarding Alexandra Hall picking up money dated 11-28-04.			
82.	List of Trilateral Commission Members of 2003.			
83.	Alan Dershowitz Letter dated 04/19/06 and Statute 90.410.			
84.	Guy Fronstin letter dated 04/17/06.			
85.	Jeffrey Epstein Account Information.			
86.	Jeffrey Epstein Criminal Closeout Sheet.			
87.	JEGE, Inc. Passenger Manifest.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
 Case No.: 502009CA040800XXXXMBAG
 Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

88.	Hyperion Air Passenger Manifest.			
89.	Flight information for Dana Burns.			
90.	Passenger List Palm Beach flights 2005.			
91.	Jeffrey Epstein notepad notes, re: Maria.			
92.	Pleadings of Jane Doe 1 and 2 v. US case.			
93.	Jeffrey Epstein 5 th Amendment Speech.			
94.	Reiter letter to Krisher, 05/01/06.			
95.	Alexandra Hall Police Report, 11/28/04.			
96.	Victim's school records and transcripts.			
97.	Victim Notification letter to Virginia Roberts, 09/03/08			
98.	Police report of Juan Alessi theft at Jeffrey Epstein's home.			
99.	Victim's Medical Records from Dr. Randee Speciale.			
100.	All surveillance conducted by law enforcement on Jeffrey Epstein's home.			
101.	Emails received from Palm Beach Records related to Jeffrey Epstein.			
102.	All items listed on the Palm Beach Police Property Report Lists and/or Property Receipts.			
103.	All copies of convictions related to Jeffrey Epstein.			
104.	Jeffrey Epstein criminal records.			
105.	All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

106.	Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto.			
107.	Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause.			
108.	Demonstrative aids and exhibits including, but not limited to, charts, diagrams and models, surveys, photographs and similar material including blow-ups of the listed items/exhibits.			
109.	Edwards' reserves all objections to Epstein's Exhibits.			
110.	Edwards reserves the right to supplement and/or amend his Exhibit List.			
111.	By listing an Exhibit, Edwards is not waiving his right to object to same at trial and does not waive their right to amend same.			
112.	All exhibits listed by Epstein subject to Edwards' objections.			
113.	All pleadings and attachments in the action under the Crime Victims Rights Act prosecuted by Bradley Edwards on behalf of victims of Epstein's criminal molestations.			
114.	Edwards' Motions for Summary Judgment, all attachments thereto and all Undisputed Facts.			
115.	All time records and hourly billing documentation produced in discovery.			
116.	All deposition testimony and discovery responses by Epstein submitted in this action.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
 Case No.: 502009CA040800XXXXMBAG
 Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

117.	All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.			
118.	All submissions by Epstein in connection with the Rothstein deposition.			
119.	All Settlement Agreements between Epstein and victims of his sexual molestations.			
120.	Phone Journal taken from Epstein's home and produced to the FBI by Alfredo Rodriguez.			
121.	Photo depicting Virginia Roberts, Ghislaine Maxwell and Prince Andrew.			
122.	All flight logs for any Jeffrey Epstein owned or controlled aircraft.			
123.	All emails produced by Defendant and/or all emails produced by Plaintiff in this case.			
124.	Evidence of contributions to the Palm Beach Police Dept.			
125.	Dr. Bernard J. Jansen Expert Report, Attachments and Back-up Documents, October 20, 2017.			
126.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Complaint, December 7, 2009.			
127.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Fourth Amended Counterclaim, January 9, 2013.			
128.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Plaintiff/Counter-Defendant Jeffrey Epstein's Answer and Affirmative Defenses to Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim, February 21, 2013.			

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129.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Notice of Voluntary Dismissal, August 16, 2012.			
130.	Brad Edward's Times Records and Billing Records related to this matter.			
131.	Jeffrey Epstein's NY State Online Sex Offender Registry Profile.			
132.	New York Post article: Billionaire Jeffrey Epstein: I'm a sex offender, not a predator, February 25, 2011.			
133.	Medical Records: New York Presbyterian Hospital re: Virginia Guiffre, 2001.			
134.	Hand Drawing of Bart Simpson (signed by Matt Groening).			
135.	Proposed Joint Letter to the Special Master.			
136.	Front and Back of Hard Copy Color Photo Virginia (Mar-A-Lago).			
137.	Color photo of Virginia Roberts on ferry "New York".			
138.	Scenic photo of Time Square.			
139.	Virginia Roberts photo on back of ship.			
140.	Picture of room in New York.			
141.	Color photo of man on horse (New Mexico Ranch).			
142.	Color photo of Virginia Roberts at Zorro Ranch standing in front of gate sign with "Z" (New Mexico Ranch).			
143.	Virginia Roberts photo on horse front of ranch.			
144.	Virginia Roberts photo standing against rocks (red coat).			

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145.	Virginia Roberts standing against rocks (red coat) (far) (with back photo white; back date).			
146.	Virginia Roberts photo riding horse blue jacket far.			
147.	Virginia Roberts photo on side of horse hand up.			
148.	Virginia Roberts photo on side of horse.			
149.	Virginia Roberts photo outside next to tables.			
150.	Virginia Roberts photo red coat leaning on rail.			
151.	Virginia Roberts photo standing outside next to fireplace.			
152.	Virginia Roberts photo standing in front of ranch.			
153.	Virginia Roberts photo with hand over head (black/white).			
154.	Virginia Roberts photo standing next to piano.			
155.	Virginia Roberts photo in front of fireplace (museum).			
156.	Virginia Roberts photo in front of wagon in museum.			
157.	Color photo of Virginia Roberts in front of museum exhibition (Santa Fe, New Mexico).			
158.	Photograph in Spain Jeffrey Epstein and Ghislaine Maxwell in front of building.			
159.	Virginia Roberts (Australia Storage): Photo Book 2.			
160.	Cover photo book 2.			
161.	Scenic photo (with back photo white).			
162.	Scenic photo (with back photo white).			
163.	Scenic photo (with back photo white).			

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164.	Scenic photo (with back photo white).			
165.	Virginia Roberts steps with trees overhead.			
166.	Scenic photo (with back photo white).			
167.	Scenic photo (with back photo white).			
168.	Scenic photo (with back photo white).			
169.	Scenic photo (with back photo white).			
170.	Scenic photo (with back photo white and black).			
171.	Scenic photo (with back photo white and black).			
172.	Scenic photo (with back photo white and black).			
173.	Virginia Roberts on steps with children (with back photo white and black).			
174.	Virginia Roberts on street white wall (far) (with back photo white and black).			
175.	Travel envelope.			
176.	Singapore Airlines Travel Cover with handwritten notes by Virginia Roberts.			
177.	Thailand Hotel Receipts.			
178.	Court Docket for Jane Doe No. 102 v. Epstein.			
179.	Typed List of Victims/ Co-Conspirators unique to the investigation of Jeffrey Epstein.			
180.	Ghislaine Maxwell deposition, 04/22/16			
181.	FBI Form 302 - Interview of Virginia Giuffre in Australia (Redacted) 03/17/11.			
182.	Mark Epstein Deposition.			

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183.	March 19, 2008, email of Assistant U.S. Attorney Ann Marie Villafana (Summary of the Case) (Coonan File).			
184.	Color photos of Ghislaine Maxwell, one with Jeffrey Epstein.			
185.	Airport Codes (<i>Demonstrative</i>).			
186.	March 3, 2011 - New York Post: Uppity Tranny to Epstein: Pay Up!			
187.	DVD of Epstein PBPD 358 El Brillo Search Warrant Walk Through 05/11/09; DVD Audio from Cassettes, Part 1.			
188.	[Alex Hall] Redacted Transcript taken by Detective Joe Recarey and Detective Dawson (with Exhibits) 10/11/05.			
189.	Palm Beach Police Investigation: Palm Beach PD Records; Wachovia Bank Account.			
190.	Folder titled Sara Kellen Cell Phone Summary by Detective Recarey: Enclosing phone records. SAO FOIA Disc 7 (State Files).			
191.	Folder titled Sara Kellen Cell: Sara Kellen Cell Phone Usage 09/2005-10/2005.			
192.	Folder titled Sara Kellen: AT&T February 12, 2005 Statement.			
193.	Demand Deposit Account Statement History for Household Bank Account Jeffrey Epstein or Ghislaine Maxwell or Alfredo Rodriguez.			
194.	Santa Monica Police Report (May 12, 1997).			
195.	Folder titled PLANES: Information relating to Epstein's planes/aircrafts collected by the State Attorney's Office unique to the investigation of Jeffrey Epstein.			

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196.	Palm Beach House/Information Sheet.			
197.	Sworn Statement of Juan Alessi taken by Palm Beach Police Department.			
198.	Juan Alessi Deposition (Vol. I) 09/08/09.			
199.	Juan Alessi Deposition (Vol II) 09/08/09.			
200.	Brochure for Boeing Super 727-100.			
201.	Passport application; issued January 12, 2001.			
202.	Sentencing Transcript, Alfredo Rodriguez.			
203.	Criminal Complaint – Alfredo Rodriguez.			
204.	Plea Agreement – Alfredo Rodriguez.			
205.	Photos of Jeffrey Epstein's properties and planes.			
206.	Photos of Jeffrey Epstein employees and former employees.			
207.	Jeffrey Epstein Guilty Plea documents.			
208.	Palm Beach County State Attorney's Response to Public Records Request (<i>including audio recordings</i>).			
209.	Any and all responses to Subpoenas Duces Tecum with or without deposition.			
210.	All Interrogatories and Answers thereto, Requests to Produce and Responses, Requests for Admissions and Responses thereto.			
211.	Any and all documents produced in this action.			
212.	Any and all depositions taken in this action.			
213.	Any documents or other exhibit attached to or used during any deposition in this action.			

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214.	Any and all exhibits, documents, etc. referred to in any deposition.			
215.	Any and all documents and exhibits designated by all parties to this action.			
216.	Any and all exhibits needed for impeachment or rebuttal.			
217.	Any and all pleadings filed in this action.			
218.	Any and all records produced or that will be produced by all records custodians relative to this action.			

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 7th day of December, 2017.


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