

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Related cases:

08-80232, 08-08380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

**DEFENDANT'S, JEFFREY EPSTEIN, RESPONSE IN OPPOSITION
TO PLAINTIFF'S, JANE DOE, MOTION TO COMPEL ANSWERS TO
PLAINTIFF'S INTERROGATORIES [DE 99]**

Defendant, JEFFREY EPSTEIN, hereby files his Response in Opposition to Plaintiff's, JANE DOE, Motion to Compel Answers to Plaintiff's Interrogatories dated July 10, 2009 [DE 99] (Consolidated Case No. 08-CIV-80119 [DE 196].

I. Procedural Background

Plaintiff's Motion to Compel is filed at DE (99). The Motion to Compel was voluminous and orders had been entered by this court (DE 242 and 293) addressing other 5th Amendment issues; therefore, the undersigned counsel endeavored to eliminate certain requests outlined in Plaintiff's a Motion to Compel. As a result, a Joint Notice of Agreement was entered advising the court that several of the requests had been addressed by counsel alleviating the court from having to rule on same. (DE 316).

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Defendant filed his Rule 4 Appeal (DE 282) and his Supplementary Brief (DE 283), which address several of the 5th Amendment arguments applicable to the requests outlined herein. Portions of DE 282 and 283 were provided to the court in camera pursuant to the court's order (DE 242). Therefore, for the Court's ease of reference and in an attempt to maintain brevity, Defendant hereby incorporates those arguments and case law as if fully set forth herein.

Significantly, these cases have been consolidated for discovery. Therefore, consistent rulings should apply. In making those rulings, this Court must continue to recognize that the allegations in the related cases cannot be forgotten. (E.g., see DE 242 and 293, p.5-6). Answers to discovery requests in one case could provide a link in the chain of evidence used to prosecute Epstein for a crime or provide an indirect link to incriminating evidence in another case. Id. and *infra*.

The Interrogatories and the responses thereto are attached as **Composite Exhibit "A"**.

II. The Interrogatories, Argument And Memorandum Of Law

a. Interrogatory Numbers 12, 17 & 23

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

Interrogatory No. 17. Provide the names, addresses, and phone numbers of all your current accountants, financial planners or money managers handling, or assisting in the handling, of your money or assets.¹

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

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

¹ The only difference between the response to Interrogatory Number 12 is that it raises the attorney-client work-product privileges at the conclusion of the answer. Otherwise, the responses to Interrogatory Numbers 17 and 23 are identical to the response to Interrogatory Number 12.

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

In Jane Doe No. 2 v. Epstein, Case No. 80119, the Magistrate Judge found, “[i]n 2008, Epstein entered into a Non-Prosecution Agreement (“NPA”) with the United States Attorney General’s Office for the Federal Southern District of Florida (“USAO”) and the State Attorney’s Office for Palm Beach County. Under the terms of the NPA, any criminal prosecution against Epstein is deferred as long as he abides by the certain terms and conditions contained therein. If at any time the USAO’s Office has reason to believe Epstein is in breach of the Agreement, it need only provide Epstein’s counsel with notice of the breach and then move forward with Epstein’s prosecution. Accordingly, the undersigned would agree with Epstein ... that the fact there exists a NPA does not mean that Epstein is free from future criminal prosecution, and that in fact, ‘the threat of prosecution is real, substantial and present.’” See August 4, 2009 Order (DE 242) and September 9, 2009 Omnibus Order (DE 293); and Manson v. United States, 244 U.S. 362, 365 (1917). Moreover, as this court knows, the NPA only defers prosecution in the Southern District of Florida, not other districts. Therefore, Epstein is “confronted by a substantial and ‘real,’ and not merely trifling or imaginary, hazard[] of incrimination” when it comes to Plaintiff’s discovery requests. United States v. Apfelbaum, 445 U.S. 115, 128 (1980).

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The Fifth Amendment serves as a guarantee against testimonial compulsion and provides, in relevant part, that “[n]o person...shall be compelled in any Criminal Case to be a witness against himself.” (DE 242, p.5); see also Edwin v. Price, 778 F.2d 668, 669 (11th Cir. 1985) (citing Lefkowitz v. Turley, 414 U.S. 70, 77 (1973)). The privilege is accorded liberal construction in favor of the right and extends not only to answers that would support a criminal conviction, but extends also to those answers which would furnish a link in the chain of evidence needed to prosecute the claimant for a crime. See Hoffman v. United States, 341 U.S. 479, 486 (1951). Information is protected by the privilege not only if it would support a criminal conviction, but also in those instances where “the responses would merely ‘provide a lead or clue’ to evidence having a tendency to incriminate.” See United States v. Neff, 315 F.2d 1235, 1239 (9th Cir.), cert denied, 447 U.S. 925 (1980); Blau v. United States, 340 U.S. 159 (1950); SEC v Leach, 156 F.Supp.2d 491, 494 (E.D. PA. 2001).

The Court has already ruled on questions similar to the ones posed by Jane Doe (i.e., Interrogatory Numbers 12, 17 and 23) and which seek similar identifying information that could be used to incriminate Epstein, would furnish a link in the chain of evidence used to prosecute him and would require Epstein, if answers were provided, to be a witness against himself. For instance, Jane Doe #2-7, asked the following:

No. 13. List the names and addresses of all persons who are believed or known by you, your agents, or your attorneys to have any knowledge concerning any of the issues in this lawsuit; and specify the subject matter about which the witness has knowledge.

No. 14. State the name and address of every person known to you, your agents, or your attorneys who has knowledge about, possession, or custody, or control of, any model, plat, map, drawing, motion picture, videotape or photograph pertaining to any fact or issue involved in this controversy; and describe as to each, what item such person has, the name and address of the person who took or prepared it, and the date it was taken or prepared.

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No. 15. Identify all persons who have made a claim, complaint, demand or threat against you relating to alleged sexual abuse or misconduct on a minor, and for each provide the following information:

- a. The person's full name, last known address and telephone number;
- b. The person's attorney, if represented;
- c. The date of the alleged incident(s);
- d. If a civil case has been filed by or on behalf of the person, the case number and identifying information.

No. 16. State the facts upon which you intend to rely for each denial of a pleading allegation and for each affirmative defense you intend to make in these cases.

No. 17. Identify all witnesses from whom you have obtained or requested a written, transcribed or recorded statement relating to any issue in these cases, and for each, in addition to the witness's identifying information, state the date of the statement and identify the person taking the statement.

The court sustained Epstein's Fifth Amendment Privilege as it related to the above interrogatories. (DE 242, p.7-11). Here, Jane Doe's Interrogatory No. 12 is the same as Jane Doe #s 2-7 Interrogatory Numbers 13, 14 and 15 in that Interrogatory No. 12 seeks compelled statements that could reasonably "furnish a link in the chain of evidence needed to prosecute Epstein in future criminal proceedings or even support a criminal conviction." Interrogatory Numbers 12 and 17, ask Epstein to identify "persons or witnesses who [may]have knowledge" of the events in question. (DE 242) Asking Epstein to identify those individuals that may have information or that will provide a statement on his behalf, including the identity of his "accountants, financial planners or money managers" will "...implicate the Fifth Amendment, in that by requiring Epstein to list such persons or witnesses, Epstein is being forced to incriminate himself in the commission of crimes" and is further forcing Epstein to provide compelled information as to his version of the facts (e.g., witness statements which, at this juncture, are also protected by the attorney-client and work-product privileges). See infra and DE 242. Asking Epstein to identify his accountants, financial planners or money managers, is the same thing as

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asking him to identify and provide a list of his employees, which the court has already ruled would implicate Epstein's Fifth Amendment privilege as it is tantamount to asking Epstein to "...identify potential witnesses against him. . ."² (DE 242, p. 9-11)

In addition, Interrogatory Number 17 and the information sought relates to potential federal claims of violations. See infra for more detailed and incorporated argument and DE 282 and 283, in camera.

Next, Interrogatory Number 23 seeks an answer delineating the facts upon which Epstein relies for each affirmative defense in his answer. First, an answer has not yet been filed in this matter as Defendant's Motion to Dismiss remains pending. Second, this court has also ruled that such an interrogatory "... is a contention interrogatory seeking the facts upon which Epstein relies to support each of his pleading allegation denials and for each affirmative defense." (DE 242, p8.) The court reasoned: "[a]s Epstein correctly observes, forcing him to answer this [contention] interrogatory unconstitutionally places him in the position of being compelled to testify as to his version of the facts, and, in asserting affirmative defenses, being compelled to admit to Plaintiff's version of the facts." (DE 242, p.8). That same ruling must apply here, and may also be applied to Interrogatory Number 12.

Requiring Epstein to list these individuals would constitute compelled testimonial admissions that could potentially provide a 'lead or clue' or a link in the chain of evidence having a tendency to incriminate Epstein and would threaten to invade his privilege against being

² In Jane Doe No. 2 v. Epstein, the Court sustained Epstein's Fifth Amendment objections to interrogatories: asking Epstein to identify all employees who performed work inside his Palm Beach residence and all other employees who came to the residence, asking Epstein to identify any who gave or were asked to give him massages, requesting information regarding the identity of persons who provided transportation services, seeking a list of Epstein's employees' telephone numbers, asking Epstein to identify any persons or witnesses who have knowledge or are in possession of physical evidence pertaining to the events in question, seeking information related to alleged sexual abuse or misconduct on a minor, and seeking the facts on which Epstein relies to support pleading denials and affirmative defenses. See (DE 242).

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required to produce and/or testify. Rudy-Glanzer v. Glanzer, 232 F.3d 1258, 1263 (9th Cir. 2000)(the “privilege” against self-incrimination does not depend upon the likelihood, but upon the possibility of prosecution and also covers those circumstances where the disclosures would not be directly incriminating, but could provide an indirect link to incriminating evidence).

Clearly, this court has already ruled that Epstein can properly invoke his Fifth Amendment right to not identify a person who may have information pertaining to the alleged events. For these reasons, Epstein’s justified concern with regard to answering the above interrogatories and the resulting waiver of his Fifth Amendment Privilege in this regard and/or providing self-incriminating information is substantial, real and not merely imaginative. Accordingly, based on the facts and circumstances of this case, and under applicable law, Defendant’s assertion of the protections afforded under the 5th, 6th, and 14th Amendments of the United States Constitution are required to be upheld.

b. Interrogatory Numbers 2, 3, 4, 5, 6, 7, 13, 14 and 15

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

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

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

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

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

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

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

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

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

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

The Fifth Amendment

As set forth in more detail in DE 282 and 283, which were provided to the court in camera, Epstein cannot provide answers/responses to questions relating to his financial history and condition without waiving his Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. The requests are unreasonable, overbroad, confidential, proprietary in nature and seek information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Responding to the above financial requests would require Epstein to identify information regarding matters as set forth in more detail in DE 282 and 283, which were provided to the Court in camera. Identifying the specified information would result in testimonial disclosures that would communicate statements of fact. Again, the information sought relates to potential federal claims of violations. See DE 282 and 283, in camera.

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Responding would therefore constitute a testimonial admission and thus presents a real and substantial danger of self-incrimination in this case, in other related cases and as well in areas that could result in criminal prosecution. See generally Hoffman v United States, 341 U.S. 479, 486 (1951) and United States v. Hubbell, 530 U.S. 27, 36, 120 S.Ct. 2037, 2043 (2000).

The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. These interrogatories, if answered, may result in compelled testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other related inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

Accordingly, any compelled testimony that provides a "lead or clue to a source of evidence of such [a] crime" is protected by Fifth Amendment. SEC v Leach, 156 F.Supp.2d 491, 494 (E.D. PA. 2001). See supra. Questions seeking "testimony" regarding names of witnesses, leads to phone or travel records, or financial records that would provide leads to tax or money laundering or unlicensed money transmittal investigations are protected. See also Hoffman v United States, 341 U.S. 479, 486 (1951) ("the right against self-incrimination may be invoked if the answer would furnish a link in the chain of evidence needed to prosecute for a crime"). See also Hoffman v United States, 341 U.S. 479, 486 (1951) ("the right against self-incrimination may be invoked if the answer would furnish a link in the chain of evidence needed to prosecute for a crime").

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To the extent Plaintiff claims she needs the information concerning asset transfers based on her unsupported presumption that Epstein is fraudulently transferring assets, same is premature and unsupported by the law for the reasons set forth in Epstein's Memorandum of Law in Opposition to Plaintiff's Motion for Injunction Restraining Fraudulent Transfer of Assets (DE 198).

The court will note that, as worded, that similar interrogatories seek information regarding Epstein's assets, ownership of assets and transfer of assets in locations inside and outside the 50 United States. Defendant has already provided this court with sufficient argument at DE 282 and DE 283 detailing why the production or identification of information showing or providing a clue as to Epstein's whereabouts could provide a link in the chain of evidence regarding: (a) Epstein's air travel within the United States and Foreign Territories; (b) Epstein's communications with others relating to or referring to females coming into the United States from other countries; and (c) Epstein's personal calendars and schedules. Given that the essential proof of an allegation of 18 U.S.C. 2423(b) would include travel records, schedules regarding trips and locations, flight records, calendars, and transportation arrangements, the court found that Epstein had made a more particularized showing because producing such information "could reveal the availability to him and/or use by him of interstate facilities and thus would constitute a link in the chain of evidence that could potentially expose [Epstein] to the dangers of self incrimination." (DE 293, p.6)

Here, Plaintiff's request that Epstein's identify his financial information, ownership of assets and transfers of assets inside and outside the 50 United States of assets "could reveal the availability to him and/or use by him of interstate facilities and thus would constitute a link in the chain of evidence that could potentially expose [Epstein] to the dangers of self incrimination."

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(DE 293, p.6). Plaintiff wishes to obtain this information to corroborate her request for Epstein's passport and pages attached thereto identifying the locations Epstein has traveled outside of the United States, which is no different from the requests this Court has already ruled upon and sustained Epstein's Fifth Amendment privilege in response thereto. (DE 292). In summary, this court reasoned that:

"[i]n this and the other civil actions, Plaintiff's allege that Epstein violated certain federal and state criminal statutes in an attempt to make claims against Epstein ranging from sexual battery to intentional infliction of emotional distress. The lynchpin for the exercise of federal criminal jurisdiction under 18 U.S.C. §2422(b), which figures in some of the complaints filed, is 'the use of any facility or means of interstate or foreign commerce' and the analogous essential element of 18 U.S.C. §2423(b), which also figures in some of the Complaints, is 'travel[s] in interstate commerce or travels into the United States or . . . travels in foreign commerce.' Accordingly, requiring Epstein to provide responses. . .would in essence be compelling him to provide assertions of fact. . . .

While these interrogatories appear to be general-identification type information, which on their face may not appear to infringe upon Epstein's rights under the 5th Amendment, responding to same would furnish Plaintiff with the ability to serve subpoenas on certain institutions, entities, and possibly individuals that may furnish a link in the chain of evidence needed to convict Epstein of a crime. See (DE 282 and 293, in camera) Epstein cannot be required to waive his privileges under the Fifth, Sixth and Fourteenth Amendments to the United States Constitution and provide compelled testimony and information that may, directly or indirectly, furnish Plaintiff a clue or link in the chain of evidence used to prosecute him. Rudy-Glanzer v. Glanzer, 232 F.3d at 1263(the "privilege" against self-incrimination does not depend upon the likelihood, but upon the possibility of prosecution and also covers those circumstances where the disclosures would not be directly incriminating, but could provide an indirect link to incriminating evidence). Essentially, Plaintiff's interrogatories seek to have Epstein be a witness

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against himself, assist with Plaintiff's investigation and identify areas that could result in future prosecution of Epstein.

As an example, Jane Doe #s 2-7, asked the following question:

No. 11. Identify all telephone numbers used by Epstein, including cellular phones and land lines in any of his residences, by stating the complete telephone number and the name of the service provider.

After making a more particularized showing, this court reasoned: “[i]n light of the additional information provided [in DE 282], the court is now persuaded that Epstein's whereabouts. . . are crucial issues in this case and other related cases and that if he is forced to reveal this information, these testimonial disclosures could subsequently be used to incriminate him and/or prosecute him for a criminal offense.” (DE 293, p.4-5) The court has correctly recognized that “the lynchpin for the exercise of federal criminal jurisdiction under 18 U.S.C. §2422(b), which figures in some of the complaints filed, is ‘the use of any facility or means of interstate or foreign commerce’ and the analogous essential element of 18 U.S.C. §2423(b), which also figures in some of the Complaints, is ‘travel[s] in interstate commerce or travels into the United States or . . . travels in foreign commerce.’” Accordingly, if Epstein's telephone records are protected from disclosure under the Fifth Amendment it goes without saying that his financial information is also protected from disclosure as revealing same could result in subsequent subpoenas for information that may identify his whereabouts on a particular day and time and may also lead to the identity of witnesses that may have knowledge of the alleged events. Plaintiff's attempt to backdoor this information though Epstein by virtue of her artfully phrased interrogatories must fail.

Clearly, this court has already ruled that Epstein can properly invoke his Fifth Amendment right to not identify a person who may have information pertaining to the alleged events. Stated differently, Epstein cannot be compelled to provide information that would lead

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to the identity of witnesses that may have knowledge of the alleged events. In sum, Epstein cannot be required to be a witness against himself or provide information that may incriminate him and lead to future prosecution.

For these reasons, Epstein's justified concern with regard to answering the above interrogatories and the resulting waiver of his Fifth Amendment Privilege in this regard and/or providing self-incriminating information is substantial, real and not merely imaginative. Accordingly, based on the facts and circumstances of this case, and under applicable law, Defendant's assertion of the protections afforded under the 5th, 6th, and 14th Amendments of the United States Constitution are required to be upheld.

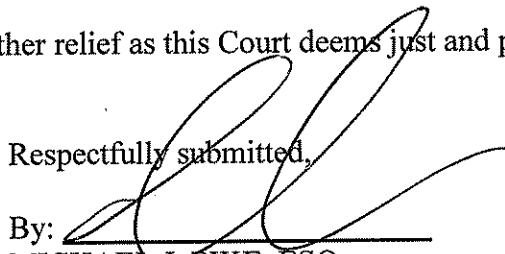
Wherefore, Epstein respectfully requests that this Court issue and order:

a. finding that the danger Epstein faces by being forced to testify in this case relative to the above interrogatories is substantial and real, and not merely trifling or imaginary;

b. sustaining Epstein's Fifth Amendment Privilege and other delineated constitutional privileges as it relates to the above interrogatories and denying Plaintiff's Motion in that regard; and

c. for such other and further relief as this Court deems just and proper.

Respectfully submitted,

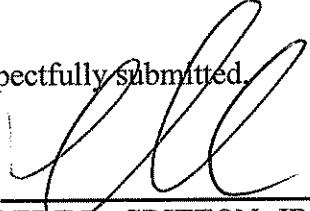
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Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the following Service List in the manner specified by CM/ECF on this 20th day of October, 2009

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