

# EXHIBIT 4

UNITED STATES DISTRICT COURT  
for the  
Southern District of New York

Virginia L. Giuffre, Plaintiff

v.

Civil Action No. 15-CV-07433-RWS

Ghislaine Maxwell, Defendant

AFFIDAVIT

Douglas G. Mercer, being duly sworn deposes and states:

1. I am employed as the Chief Investigator by Alpha Group Investigations, an investigative and security services company. I supervised the service of subpoenas upon Jeffrey Epstein, Sarah Kellen-Vickers and Nadia Marcinkova.
2. On Monday, April 25<sup>th</sup>, 2016 Alpha Group's Research Coordinator Enza Miller conducted research to determine current reported addresses in New York for Jeffrey Epstein, Sarah Kellen-Vickers and Nadia Marcinkova. Ms. Miller determined the following:

Jeffrey Epstein:

457 Madison Avenue, Apt 4, New York, New York 10022  
9 E. 71<sup>st</sup> Street, New York, New York 10021  
301 E. 66<sup>th</sup> Street, Apt 10F, New York, New York 10065

Sarah Kellen-Vickers:

92 Greene Street, Front 2, New York, New York 10012  
9 E. 71<sup>st</sup> Street, New York, New York, 10012  
301 E. 66<sup>th</sup> Street, Apt 14G, New York, New York 10065

Nadia Marcinkova:

301 E. 66<sup>th</sup> Street, Apt 11E/10N, New York, New York 10065

3. On Tuesday, April 26<sup>th</sup>, at 12:21pm, Alpha Group Investigator Kevin Murphy arrived at 92 Greene Street, New York, New York to attempt to serve a subpoena on Sarah Kellen-Vickers. Investigator Murphy was advised by a doorman that Sarah Kellen-Vickers resides at the location, in Penthouse 2, but had not been staying at the location due to construction.
4. On Tuesday, April 26<sup>th</sup>, 2016 at 1:44 pm, Investigator Kevin Murphy arrived at 457 Madison Avenue, New York, New York to attempt to serve a subpoena on Jeffrey Epstein. Investigator Murphy observed that the location was called the Trunk Club, which was a private clothing retailer, not a residence.

5. On Tuesday, April 26<sup>th</sup>, 2016, at 2:16 pm, Investigator Kevin Murphy arrived at 301 E. 66<sup>th</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein, Sarah Kellen-Vickers and Nadia Marcinkova. Investigator Murphy was informed by a doorman that the doorman had observed Sarah Kellen-Vickers earlier in the day. The doorman called Sarah Kellen-Vickers apartment, but no one answered the phone. The doorman did not recognize the names of Jeffrey Epstein, or Nadia Marcinkova.
6. On Tuesday, April 26<sup>th</sup>, 2016, at 2:34 pm, Investigator Kevin Murphy arrived at 9 E. 71<sup>st</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein and Sarah Kellen-Vickers. Investigator Murphy knocked on the door and rang the bell and he finally spoke to an Asian Male, 40-45 years of age, 5'5"-5'8" tall, 150 pounds, who told the investigator that neither Jeffrey Epstein, nor Sarah Kellen-Vickers were at the residence.
7. On Thursday, April 28<sup>th</sup>, 2016, at 6:00 pm, Investigator Kevin Murphy arrived at 301 E. 66<sup>th</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein, Sarah Kellen-Vickers and Nadia Marcinkova. A doorman at the location called apartment 14G for Sarah Kellen-Vickers, but no one answered the phone. The doorman would not supply Investigator Murphy with any additional information.
8. On Thursday, April 28<sup>th</sup>, 2016 at 6:17 pm, Investigator Kevin Murphy arrived at 9 E. 71<sup>st</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein and Sarah Kellen-Vickers. Investigator Murphy was advised by an unknown female on the intercom that Jeffrey Epstein was not home, but would return to the residence sometime on Monday, May 2<sup>nd</sup>, 2016.
9. On Thursday, April 28<sup>th</sup>, 2016 at 6:56 pm, Investigator Kevin Murphy arrived at 92 Greene Street, New York, New York to attempt to serve a subpoena on Sarah Kellen-Vickers. A doorman at the building called several phone numbers to contact Sarah Kellen-Vickers and after apparently speaking to Sarah Kellen-Vickers, the doorman advised Investigator Murphy that Sarah Kellen-Vickers was not home.
10. On Saturday, April 30<sup>th</sup>, 2016, at 2:11 pm, Investigator Kevin Murphy arrived at 301 E. 66<sup>th</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein, Sarah Kellen-Vickers and Nadia Marcinkova. Investigator Murphy was informed by a doorman that the doorman had seen Sarah Kellen-Vickers earlier in the day at the building. The investigator was informed by the doorman that the doorman believed that Sarah Kellen-Vickers uses an office and an apartment at the building. The investigator was informed by the doorman that no one answered the phone in Sarah Kellen-Vickers apartment. The doorman could not provide any further information regarding Jeffrey Epstein, or Nadia Marcinkova.
11. On Saturday, April 30<sup>th</sup>, 2016, at 2:20 pm Investigator Kevin Murphy arrived at 9 E. 71<sup>st</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein and Sarah Kellen-Vickers. Investigator Murphy rang the doorbell and knocked on the door. An unknown female responded to Investigator Murphy on the intercom and the female advised that Jeffrey Epstein was not home, but would return to the location sometime on Monday, May 2<sup>nd</sup>, 2016.
12. On Saturday, April 30<sup>th</sup>, 2016 at 3:17 pm, Investigator Kevin Murphy arrived at 92 Greene Street, New York, New York to attempt to serve a subpoena on Sarah Kellen-

Vickers. The investigator was informed by a doorman that no one was staying in Penthouse 2 due to construction. Investigator Murphy was advised that the doorman had not seen Sarah Kellen-Vickers for several weeks.

13. On Tuesday, May 3<sup>rd</sup>, 2016, at 7:40 am, Investigator Joseph Dorilio arrived at 9 E. 71<sup>st</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein and Sarah Kellen-Vickers. Investigator Dorilio knocked on the door and rang the doorbell several times, but no one from within the residence responded. Investigator Dorilio served subpoenas for Jeffrey Epstein and Sarah Kellen-Vickers by taping the subpoenas to the front door.
14. On Tuesday, May 3<sup>rd</sup>, 2016, at 8:05 am, Investigator Joseph Dorilio arrived at 301 E. 66<sup>th</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein, Sarah Kellen-Vickers and Nadia Marcinkova. Investigator Dorilio was advised by a supervisor named Andrew, to leave the subpoenas with the doorman, rather than taping them to the front door. Investigator Dorilio then served subpoenas for Jeffrey Epstein, Sarah Kellen-Vickers and Nadia Marcinkova by leaving them with the doorman at the location.
15. On Tuesday, May 3<sup>rd</sup>, 2016 at 8:45 am, Investigator Joseph Dorilio arrived at 92 Greene Street, New York, New York to attempt to serve a subpoena on Sarah Kellen-Vickers. Investigator Dorilio was informed by a doorman that Sarah Kellen-Vickers had not been at the location for several months due to construction. Investigator Dorilio then served a subpoena for Sarah Kellen-Vickers to the doorman, Mike, who advised that he would contact Sarah Kellen-Vickers and give her the subpoena.
16. On Tuesday, May 3<sup>rd</sup>, 2016, the deponent mailed copies of subpoenas to the following:

Jeffrey Epstein:

9 E. 71<sup>st</sup> Street, New York, New York 10021  
301 E. 66<sup>th</sup> Street, Apt 10F, New York, New York 10065

Sarah Kellen-Vickers:

92 Greene Street, Front 2, New York, New York 10012  
9 E. 71<sup>st</sup> Street, New York, New York, 10012  
301 E. 66<sup>th</sup> Street, Apt 14G, New York, New York 10065

Nadia Marcinkova:

301 E. 66<sup>th</sup> Street, Apt 11E/10N, New York, New York 10065  
A witness fee check in the amount of \$82.80 was attached to the subpoena for Nadia Marcinkova.

17. On Saturday, May 14<sup>th</sup>, 2016 at 6:45 am, Investigator Anna Intriago arrived at 301 E. 66<sup>th</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein, Sarah Kellen-Vickers and Nadia Marcinkova. Investigator Intriago set up a surveillance position outside of the building, but did not observe Jeffrey Epstein, Sarah Kellen Vickers, or Nadia Marcinkova. At 9:00 am Investigator Intriago entered

the building at 301 E. 66<sup>th</sup> Street, New York, New York to attempt to serve the subpoenas for Jeffrey Epstein, Sarah Kellen-Vickers and Nadia Marcinkova. The doorman would not provide any information about the three subjects.

18. On Saturday, May 14<sup>th</sup>, 2016 at 9:10 am, Investigator Anna Intriago arrived at 9 E. 71<sup>st</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein and Sarah Kellen-Vickers. Investigator Intriago rang the bell and knocked on the door, but no one responded.
19. On Monday, May 16<sup>th</sup>, 2016 at 6:30 am Investigator Anna Intriago arrived at 301 E. 66<sup>th</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein, Sarah Kellen-Vickers and Nadia Marcinkova. Investigator Intriago spoke to a doorman who advised that Nadia Marcinkova resided within the building, but travels a lot. The doorman advised Investigator Intriago that Nadia Marcinkova was not in the building at that time. The doorman advised Investigator Intriago that Jeffrey Epstein does not reside in the building, but owns apartments. The doorman advised Investigator Intriago that Sarah Kellen-Vickers no longer resides within the building; that Sarah Kellen-Vickers moved about two years ago.
20. On Monday, May 16<sup>th</sup>, 2016 at 11:25 am Investigator Anna Intriago arrived at 9 E. 71<sup>st</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein and Sarah Kellen-Vickers. Investigator Intriago rang the doorbell and knocked on the door. An unknown male responded on the intercom and advised that neither Jeffrey Epstein, nor Sarah Kellen-Vickers were at the residence. The unknown male would not tell Investigator Intriago when Jeffrey Epstein and Sarah Kellen-Vickers were expected to return to the residence.
21. On Monday, May 16<sup>th</sup>, 2016 at 12:00 pm Investigator Anna Intriago returned to 301 E. 66<sup>th</sup> Street, New York, New York to ascertain if Nadia Marcinkova had returned to the residence. Investigator Intriago was advised by the doorman that Nadia Marcinkova had not returned to the residence. The doorman advised Investigator Intriago that no one was permitted to enter the building unless permission was given by a resident.
22. On Tuesday, May 17<sup>th</sup>, 2016, at 4:06 pm Investigator Anna Intriago arrived at 301 E. 66<sup>th</sup> Street, New York, New York to attempt to serve subpoenas on Jeffrey Epstein, Sarah Kellen-Vickers and Nadia Marcinkova. At 5:00pm, after Investigator Intriago did not observe Jeffrey Epstein, Sarah Kellen-Vickers, or Nadia Marcinkova enter or leave the building, Investigator Intriago entered the building and spoke to a doorman. The doorman would not provide any information about any resident.
23. On Tuesday, May 17<sup>th</sup>, 2016, shortly after 5:00 pm Investigator Anna Intriago responded to 9 E. 71<sup>st</sup> Street, New York, New York to attempt to locate and serve subpoenas on Jeffrey Epstein and Sarah Kellen-Vickers. The investigator did not observe Jeffrey Epstein, or Sarah Kellen Vickers enter or leave the residence.
24. On Tuesday, May 17<sup>th</sup>, 2016 at 6:21 pm, at 301 E. 66<sup>th</sup> Street, New York, New York Investigator Anna Intriago served subpoenas for Jeffrey Epstein, Sarah Kellen-Vickers and Nadia Marcinkova by delivering the subpoenas to Jose Pepin, a doorman at the 301 E. 66<sup>th</sup> Street, New York, New York.

25. On Tuesday, May 17<sup>th</sup>, 2016 at 6:39 pm, at 9 E. 71<sup>st</sup> Street, New York, New York Investigator Anna Intriago had attempted to serve subpoenas for Jeffrey Epstein and Sarah Kellen-Vickers by ringing the doorbell and knocking on the door. An unknown female answered on the intercom and advised Investigator Intriago that neither Jeffrey Epstein, nor Sarah Kellen-Vickers were at the residence. The unknown female advised that she could not accept the subpoenas for Jeffrey Epstein, or Sarah Kellen-Vickers. Investigator Intriago then served the subpoenas for Jeffrey Epstein and Sarah Kellen-Vickers by taping the subpoenas to the front door.

26. On Wednesday, May 18<sup>th</sup>, 2016 the deponent mailed copies of subpoenas to the following:

Jeffrey Epstein:

9 E. 71<sup>st</sup> Street, New York, New York 10021  
301 E. 66<sup>th</sup> Street, Apt 10F, New York, New York 10065  
A witness fee check in the amount of \$41.10 was attached to the subpoena for Jeffrey Epstein

Sarah Kellen-Vickers:

9 E. 71<sup>st</sup> Street, New York, New York, 10012  
301 E. 66<sup>th</sup> Street, Apt 14G, New York, New York 10065  
A witness fee check in the amount of \$41.10 was attached to the subpoena for Sarah Kellen-Vickers.

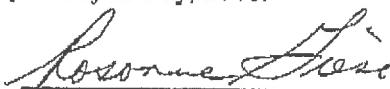
Nadia Marcinkova:

301 E. 66<sup>th</sup> Street, Apt 11E/10N, New York, New York 10065  
A witness fee check in the amount of \$41.10 was attached to the subpoena for Nadia Marcinkova.



DOUGLAS G. MERCER

Sworn to before me this  
24<sup>th</sup> Day of May, 2016.



Enza Miller Rosanne Giese  
Notary Public

ROSANNE GIENE  
Notary Public, State of New York  
No. 01G14819908, Suffolk County  
Term Expires February 28, 2018