

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE,

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

**PLAINTIFF'S ANSWERS TO
DEFENDANT'S FIRST INTERROGATORIES**

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, by and through her undersigned counsel, has served her Answers to Defendant's First Interrogatories, numbered 1 and 25, inclusive, propounded to said Plaintiff on or about December 10, 2008.

WE HEREBY CERTIFY that the original of the foregoing has been provided by United States mail this 23rd day of January, 2009, to:

Robert D. Critton, Jr., Esquire
Michael J. Pike, Esquire
Burman, Critton, Luttier & Coleman, LLP
515 North Flagler Drive
Suite 400
West Palm Beach, Florida 33401

with a copy to:

Jack Alan Goldberger, Esquire
Atterburty, Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, Florida 33401

"B"

Michael R. Tein, Esquire
Lewis Tein, P.L.
3059 Grand Avenue
Suite 340
Coconut Grove, Florida 33133

THE LAW OFFICE OF BRAD EDWARDS &
ASSOCIATES, LLC

By:



Brad Edwards, Esquire
Attorney for Plaintiff
Florida Bar No. 542075
2028 Harrison Street
Suite 202
Hollywood, Florida 33020
Telephone: 954-414-8033
Facsimile: 954-924-1530
E-Mail: be@bradedwardslaw.com

Paul G. Cassell
Attorney for Plaintiff
Pro Hac Vice
332 S. 1400 E.
Salt Lake City, UT 84112
Telephone: 801-585-5202
Facsimile: 801-585-6833
E-Mail: cassellp@law.utah.edu

DEFENDANT'S FIRST INTERROGATORIES TO PLAINTIFF

- 1. What is the name and address of all persons answering or assisting in answering these interrogatories, and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?**

Jane Doe, with the assistance of my attorney, Brad Edwards

Plaintiff objects to Defendant, Jeffrey Epstein, having her address, as Mr. Epstein is a registered sex offender and Jane Doe was a victim of his, and disclosure of her address could compromise her safety and privacy.

- 2. List the names, business addresses, telephone and cell phone numbers, dates of employment, immediate supervisor (name and address) and rates of pay regarding all employers, including self-employment, for whom you have worked in the past 10 years; this includes listing all sources of income you have received. Answer this question by year, i.e. 1998 - 2008.**

Flashdance - West Palm Beach – approximately 2007

Platinum Gold - Boynton Beach – approximately 6-8 months in 2006 - 2007

International House of Pancakes on Military Trail in West Palm Beach – approximately 2006

Stan Crooks (auctioneer) - worked as his assistant prior to 2006

3. **List all former names and when you were known by those names. State all addresses where you have lived for the past 10 years, the dates you lived at each address, your social security number, your date of birth, and if you are or have ever been married, the name of your spouse or spouses. List any children by name, date of birth and the father's name and address. List the names and address of your parents and any brother or sister.**

No former names. Date of birth and social security number will be provided to Defendant's counsel confidentially. Objection as to the remainder of this interrogatory as it asks for information that is irrelevant, not reasonably calculated to lead to admissible evidence and harassing. Plaintiff has a reasonable fear for her safety and the safety of other innocent persons and thus objects to releasing such information to a registered sex offender that sexually victimized the Plaintiff.

4. **Have you ever been convicted of a crime, other than any juvenile adjudication, which under the law under which you were convicted was punishable by death or imprisonment in excess of 1 year, or that involved dishonesty or a false statement regardless of the punishment? If so, state as to each conviction, the specific crime and the date and the place of conviction.**

Offense – shoplifting in Palm Beach County - 2006

5. **Please provide the name, address, telephone number, place of employment and job title of any person who has, claims to have or whom you believe may have knowledge or information pertaining to any fact alleged in the pleadings (as defined in Federal Rule of Civil Procedure 7(a) filed in this action), or any fact underlying the subject matter of this action.**

In addition to all persons mentioned in the criminal discovery that was provided to Epstein by the F.B.I., U.S. Attorney's Office, Palm Beach State Attorney's Office, or Palm Beach Police Department, the following are additional witnesses:

Randee Speciale, MS, LMHC (Licensed Therapist)
Palm Beach County Public Safety Department
Victim Services Division
205 North Dixie Highway
Suite 5.1100
West Palm Beach, Florida 33401
561-355-2428

Jeffrey Epstein, Sarah Kellen, Nadia Marcinkova and other persons employed by or through Jeffrey Epstein whose names are not yet known to Plaintiff.

- 6. Please state the specific nature and substance of the knowledge that you believe the person(s) identified in your response to interrogatory no. 5 may have.**

Randee Speciale is my treating trauma therapist and knows and understands the psychological and emotional damage that Defendant, Jeffrey Epstein, inflicted upon me.

Jeffrey Epstein knows that I was a minor child when he sexually touched and abused me and he knows and understands his deviant influence on me and he knows of all of the crimes he committed against me.

Sarah Kellen knows that she assisted Defendant, Jeffrey Epstein, in contacting me and having me brought to and from his house for the purpose of Jeffrey Epstein sexually abusing me. She knows he paid me and she knows I was underage. She also knows that Jeffrey Epstein has a fascination and sexual disease that attracts him to underage minor girls and that he has acted upon that deviant sexual desire for years and with numerous minor girls and children, and she assisted in furthering his sickness upon me.

Nadia and other employees of Jeffery Epstein know that I was underage, as were many other minor victims, and that I was a victim of Jeffrey Epstein's.

- 7. Were you suffering from physical infirmity, disability, disease, sickness or psychiatric/psychological condition at the time of the incident(s) described in the complaint? If so, what was the nature of the infirmity, disability, or sickness?**

Yes, PTSD.

8. **Did you consume any alcoholic beverages or take any drugs or medication within 12 hours before the time of each incident(s) described in the complaint? If so, state the type and amount of alcoholic beverages, drugs or medication which were consumed and when and where you consumed them.**

No.

9. **Describe each injury (physical, emotional, mental) for which you are claiming damages in this case, specifying the part of your body that was injured, the nature of the injury, and as to any injuries you contend are permanent, the effects on you that you claim are permanent.**

My injuries are primarily emotional/psychological and are the direct result of Defendant, Jeffrey Epstein's actions. I was touched, battered, and fondled by Defendant during the incidents described in the complaint. I observed the Defendant touch and fondle himself. I observed the Defendant ejaculate numerous times.

I was made to touch the Defendant. I also observed sexual acts and had sexual acts perpetrated on me by Defendant, Jeffrey Epstein. At various times I was unclothed, as was the Defendant and others.

At all times material, I was a child, under the age of 18 years. The Defendant also used me to bring him other minor girls and he controlled and brainwashed me into believing this lifestyle was healthy and normal for a girl my age.

I was a victim of various criminal acts and sexual exploitation. I was induced and coerced by the Defendant into acts of prostitution.

These injuries are further described in more detail in the factual allegations of the complaint.

My emotional/psychological injuries cause severe stomach pains when I think about the abuse that Defendant, Jeffrey Epstein, inflicted upon me.

- 10. Please state each item of damage that you claim, and include in your answer: the count to which the item of damages relates; the factual basis for each item of damages; and an explanation of how you computed each item of damages, including any mathematical formula used.**

I incurred medical and psychological expenses in the past and will incur such expenses in the future. I have suffered a loss of earning capacity due to Defendant, Jeffrey Epstein's influence because I was encouraged by him as a minor child to enter a life of prostitution for him.

I suffered a loss of the capacity to enjoy life as a result of being coerced and induced into committing acts of prostitution and as a result of being sexually exploited. I lost self-worth, confidence and self esteem due to his control and influence.

I have suffered mental anguish, emotional distress, fear, humiliation and psychological trauma as a result of the acts described in the complaint.

The effect of these injuries is permanent in nature. These damages are further described in the complaint. The factual basis for these damages is described in the answer to #9 above, and in the factual allegations in the complaint. Items of damage have not been calculated.

- 11. List the names and business addresses of each physician (including psychiatrist, psychologist, etc.) or medical provider (including chiropractors) who has treated or examined you, and each medical facility where you have received any treatment or examination for the injuries for which you seek damages in this case; and state as to each the date of treatment or examination and the injury or condition for which you were examined or treated.**

Randee Speciale, MS, LMHC
205 North Dixie Highway
Suite 5.1100
West Palm Beach, Florida 33401

12. List the names and business addresses of all other physicians, medical facilities, rehab facilities (drug, alcohol or psychiatric) or other health care providers including psychiatrist, psychologist, mental health counselor and chiropractors by whom or at which you have been examined or treated in the past 10 years; and state as to each the dates of examination or treatment and the condition or injury for which you were examined or treated.

Randee Speciale, MS, LMHC
205 North Dixie Highway
Suite 5.1100
West Palm Beach, Florida 33401

Wellington Regional Hospital
10101 Forest Hill Boulevard
Wellington, Florida 33414

St. Mary's Medical Center
901 - 45th Street
West Palm Beach, Florida 33407

Milton Girls Juvenile Residential Facility
5770 East Milton Road
Milton, Florida 32583

Shelter
Broadway Boulevard
West Palm Beach, Florida
(family therapy)

Drug Center
Belvedere Road
West Palm Beach, Florida
(drug evaluation when I was 16 yrs old)

VERIFICATION

The foregoing answers to interrogatories are true and correct to the best of my knowledge, information and belief.

Jane Doe
JANE DOE, Plaintiff

I, counsel for Jane Doe, the Plaintiff herein, personally witnessed the Plaintiff execute this jurat page and do swear that Jane Doe is personally known to me, is the individual identified in the foregoing answers and is the same individual whose identify has been previously disclosed, under seal, to Defendant, Jeffrey Epstein's counsel.

[Signature]
Brad Edwards

STATE OF FLORIDA :
:SS
COUNTY OF BROWARD :

SWORN TO AND SUBSCRIBED before me this 23rd day of January, 2009
by BRAD EDWARDS, who is personally known to me.

SHAWN A. GILBERT
Print Name

Shawn A Gilbert
Signature

NOTARY PUBLIC - STATE OF FLORIDA

Commission Number:

My commission expires:

(Notarial Seal)

NOTARY PUBLIC-STATE OF FLORIDA
SHAWN A. GILBERT
Commission #DD596349
Expires: OCT. 22, 2010
BONDED TRUST ATLANTIC BONDING CO., INC.