

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

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

Case No. 50 2009 CA 040800XXXXMBAG

vs.

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

Defendant/Counter-Plaintiff.

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**NOTICE OF E-FILING EXHIBITS**

Plaintiff/Counter-Defendant Jeffrey Epstein, by and through his undersigned counsel and pursuant to Rule 2.516 of the *Florida Rules of Judicial Administration*, hereby files his exhibits to **Plaintiff/Counter-Defendant Jeffrey Epstein's Motion for Summary Judgment on Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim and Supporting Memorandum of Law** ("Motion"), previously filed and accepted by the Palm Beach County, Florida Civil Division Filing # **5846906**. The files accompanying this Notice of Filing Exhibits were previously filed on September 26, 2013 and again on October 2, 2013, but moved to Pending Queue due to procedural issues. This filing is an attempt to correct those procedural issues. The attachment hereto contains the exhibits to the above referenced Motion, which is not being re-filed contemporaneously herewith. However, the exhibits are being divided based upon the filing requirements of the rules of e-filing; each new exhibit begins when so marked on the is so marked on the bottom of the first page of said exhibit.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served, via electronic service (through the e-file portal), to all parties on the attached service list, this October 3, 2013.

/s/ Tonja Haddad Coleman  
Tonja Haddad Coleman, Esq.  
Florida Bar No.: 176737  
Tonja Haddad, PA  
5315 SE 7<sup>th</sup> Street  
Suite 301  
Fort Lauderdale, Florida 33301  
954.467.1223  
954.337.3716 (facsimile)  
Attorneys for Epstein

**SERVICE LIST**

CASE NO. 502009CA040800XXXXMBAG

Jack Scarola, Esq.  
[jsx@searcylaw.com](mailto:jsx@searcylaw.com); [mep@searcylaw.com](mailto:mep@searcylaw.com)  
Searcy Denney Scarola et al.  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409

Jack Goldberger, Esq.  
[jgoldberger@agwpa.com](mailto:jgoldberger@agwpa.com); [smahoney@agwpa.com](mailto:smahoney@agwpa.com)  
Atterbury, Goldberger, & Weiss, PA  
250 Australian Ave. South  
Suite 1400  
West Palm Beach, FL 33401

Marc Nurik, Esq.  
1 East Broward Blvd.  
Suite 700  
Fort Lauderdale, FL 33301

Bradley J. Edwards, Esq.  
[brad@pathtojustice.com](mailto:brad@pathtojustice.com)  
Farmer Jaffe Weissing Edwards Fistos Lehrman  
425 N Andrews Avenue  
Suite 2  
Fort Lauderdale, Florida 33301

Fred Haddad, Esq.  
[Dee@FredHaddadLaw.com](mailto:Dee@FredHaddadLaw.com)  
1 Financial Plaza  
Suite 2612  
Fort Lauderdale, FL 33301

W. Chester Brewer, Jr., Esq.  
[wcblaw@aol.com](mailto:wcblaw@aol.com); [wcbcg@aol.com](mailto:wcbcg@aol.com)  
W. Chester Brewer, Jr., P.A.  
One Clearlake Centre, Suite 1400  
250 Australian Avenue South  
West Palm Beach, FL 33401

(con't)

Tonja Haddad Coleman, Esquire  
Tonja@tonjahaddad.com; efiling@tonjahaddad.com  
Law Offices of Tonja Haddad, P.A.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301  
Attorneys for Jeffrey Epstein

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*EPSTEIN v. ROTHSTEIN, ET AL.*  
PALM BEACH COUNTY CASE NO.: 50 2009 CA 040800XXXXMBAG

**ATTACHMENTS TO PLAINTIFF/COUNTER-DEFENDANT JEFFREY  
EPSTEIN'S MOTION FOR SUMMARY JUDGMENT ON  
DEFENDANT/COUNTER-PLAINTIFF BRADLEY EDWARDS'S FOURTH  
AMENDED COUTNERCLAIM AND SUPPORTING MEMORANDUM OF LAW**

- A. Edwards's Fourth Amended Counterclaim
- B. Epstein's Answer and Affirmative Defenses to Edwards's Fourth Amended Counterclaim
- C. Deposition Transcript of Bradley Edwards dated March 23, 2010
- D. Deposition Transcripts of Scott W. Rothstein in *In re: Rothstein Rosenfeldt Adler, PA*; 09-34791-RBR
- E. [no Exhibit "E"]
- F. Information Charging Scott W. Rothstein in *United States of America v. Scott Rothstein*, 09-60331-CR-COHN
- G. Pleadings and Docket Sheet in *LM v. Jeffrey Epstein*, 502008CA02851XXXXMB AB
- H. Pleadings and Docket Sheet in *EW v. Jeffrey Epstein*, 502008CA028058XXXXMB AB
- I. Pleadings and Docket Sheet in *Jane Doe v. Jeffrey Epstein*, 08-80893-CIV Marra/Johnson
- J. Deposition Transcript of Jeffrey Epstein
- K. Amended Complaint of *Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al.*, Case No. 09-062943(19)
- L. *The Florida Bar Daily News Summary* dated November 23, 2009
- M. Letter dated July 22, 2009 from Edwards, attached to his deposition of March 23, 2010
- N. Copies of Subpoenas
- O. Initial Complaint Filed by Epstein Dated December 9, 2009

- P. Plea Agreement between *United States of America and Scott W. Rothstein*, 09-60331-CR-COHN
- Q. Privilege Log of Framer, Jaffe, Weissing, Edwards, Fistos & Lehrman, Dated February 23, 2011
- R. Privilege Log Filed by Bradley Edwards as to Communications between Edwards and Conchita Sarnoff
- S. Electronic Communications between Edwards and Various Members of the Press
- T. *LM v. Jeffrey Epstein*, 09-81092 Marra/Johnson
- U. Order in *Jane Doe No. 2 v. Epstein* Dated November 5, 2009, 08-CV-80119
- V. Electronic Communications from Cara Holmes to Bradley Edwards dated July 29, 2009
- W. Deposition Transcript of Scott Rothstein dated December 12, 2011
- X. Affidavit of Jeffrey Epstein in Support of his Motion for Summary Judgment

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,

Defendant,

---

**FOURTH AMENDED COUNTERCLAIM**

Bradley J. Edwards (EDWARDS) sues Jeffrey Epstein (EPSTEIN) and alleges:

**COUNT I—ABUSE OF PROCESS**

1. This is an action for damages in an amount in excess of the minimum jurisdictional limits of this Court.
2. Counter/plaintiff, EDWARDS, is *sui juris*, resides in Broward County, Florida, and is an attorney licensed to practice in the State of Florida at all times material hereto.
3. Counter/defendant, EPSTEIN, is *sui juris* and is a resident of Palm Beach County, Florida.
4. EPSTEIN is a convicted felon having entered into a plea agreement pursuant to which he effectively conceded his having engaged in illicit sexual activity with a large number of female children over an extended period of time in violation of both State and Federal criminal laws.

5. EPSTEIN was sued civilly by a large number of his victims. Many of the cases against him have been settled, and upon information and belief, federal law enforcement agencies continue to investigate additional allegations of EPSTEIN'S serial abuse and molestation of children; others remain pending. As a consequence, EPSTEIN continues to face the potential of further criminal prosecution and huge civil judgments for both compensatory and punitive damages in favor of many victims of his depraved criminal exploitation of children including victims represented by EDWARDS.

6. In the face of overwhelming evidence of his guilt, EPSTEIN repeatedly asserted his Fifth Amendment Right against self-incrimination and refused to answer any substantive questions regarding his sexual exploitation of his minor victims. Lacking any substantive defense to the claims against him, EPSTEIN sought to avoid his compensatory and punitive liability and to deter cooperation in the ongoing criminal investigation by employing the extraordinary financial resources at his disposal to intimidate his victims and their legal counsel into abandoning their legitimate claims or resolving those claims for substantially less than their just value.

7. In some circumstances, EPSTEIN's tactics have proven successful, while other victims have thus far withstood this continued assault upon them and persisted in the prosecution of their claims. EDWARDS' clients are among those who continued the prosecution of their claims and the assertion of federal statutory rights afforded to them pursuant to the Federal Crime Victims' Rights Act (CVRA).

8. While prosecuting the legitimate claims on behalf of his clients, EDWARDS has not engaged in any unethical, illegal, or improper conduct nor has EDWARDS taken any action inconsistent with the duty he has to vigorously represent the interests of his clients. EPSTEIN has no reasonable basis to believe otherwise and has never had any reasonable basis to believe otherwise.

9. Nevertheless, EPSTEIN filed civil claims against EDWARDS and EDWARDS' client, L.M. for the sole purpose of further attempting to intimidate EDWARDS, L.M., and others into abandoning or settling their legitimate claims for less than their just and reasonable value. His sole purpose in both filing and prosecuting claims against EDWARDS was never the stated purpose of collecting money damages from EDWARDS since EPSTEIN knew that he had never suffered any damage as a consequence of any wrongdoing by EDWARDS. Nevertheless, EPSTEIN filed knowingly baseless and unsupportable claims against EDWARDS and proceeded to prosecute those baseless and unsupportable claims in order to divert EDWARDS from the prosecution of EDWARDS' legitimate claims against EPSTEIN, to require EDWARDS to expend time, energy and resources on his own defense, to embarrass EDWARDS and impugn his integrity, and deter others with legitimate claims against EPSTEIN from pursuing those claims at the risk of having to fend off similar assaults. EPSTEIN's real purpose was to put pressure on EDWARDS, L.M., and other victims by publishing what amounts to nothing more than a highly defamatory press release issued under the cloak of protection of the litigation privilege.

10. EPSTEIN acted purely out of malice toward EDWARDS and others, and he had ulterior motives and purposes in filing his unsupported and unsupportable claims. EPSTEIN'S

primary purpose in both filing and continuing to prosecute each of the claims against EDWARDS was to inflict a maximum economic burden on EDWARDS in having to defend against the spurious claims, to distract EDWARDS from the prosecution of claims against EPSTEIN arising out of EPSTEIN'S serial abuse of minors, and ultimately to extort EDWARDS into abandoning the claims he was prosecuting against EDWARDS.

11. The claims filed by EPSTEIN against EDWARDS included the following:

- a. violation of F.S. §§772.101, et. seq.—  
Florida Civil Remedies for Criminal Practices Act;
- b. Florida RICO—“Racketeer Influenced and Corrupt Organization Act”  
pursuant to F.S. §§895.01, et. seq.;
- c. abuse of process;
- d. fraud;
- e. conspiracy to commit fraud.

12. EPSTEIN, in his Complaint, directly alleged that EDWARDS was a knowing participant in a civil theft and criminal enterprise when EPSTEIN was well aware that there was and is absolutely no evidence whatsoever to support such false assertions. Indeed, his Complaint was replete with speculation, conjecture, and innuendo and was entirely devoid of factual support for his spurious allegations. Indicative of his total disregard for the lack of any predicate for his claims, EPSTEIN ignored the statutory requirement for written notice prior to the initiation of a civil theft claim.

13. EPSTEIN knew at the time of the filing of the specified claims and throughout his failed prosecution of those claims that he could not prosecute the claims to a successful conclusion because:

- a. they were both false and unsupported by any reasonable belief or suspicion that they were true;
- b. he had suffered no legally cognizable injury proximately caused by the falsely alleged wrongdoing on the part of EDWARDS;
- c. he had no intention of waiving his Fifth Amendment privilege against self-incrimination in order to provide the relevant and material discovery that would be necessary in the course of prosecuting the claims, (even if they had any reasonable basis), and he knew that his prosecution would consequently be barred by the sword-shield doctrine;
- d. EDWARDS' conduct in the prosecution of claims against EPSTEIN could not support the prosecution of a separate civil lawsuit against EDWARDS because of the absolute protection of the litigation privilege.

14. EPSTEIN acted purely out of malice toward EDWARDS and others, and he had ulterior motives and purposes in filing his unsupported and unsupportable claims as previously detailed in Paragraph 9.

15. EPSTEIN'S filing and prosecution of claims against EDWARDS recklessly and purposely disregarded the lack of justification for each of the claims and EPSTEIN never had as

his primary purpose to establish what he did consider or reasonably could have considered to be meritorious claims.

16. Each and every pleading filed by and on behalf of EPSTEIN in his prosecution of every claim against EDWARDS, every motion, every request for production, every subpoena issued, and every deposition taken as detailed on the docket sheet was intended with respect to EDWARDS solely and exclusively to advance EPSTEIN'S efforts at extortion as previously detailed, and constituted a perversion of process after its initial service.

17. As a result of EPSTEIN's wrongful conduct as alleged, EDWARDS has suffered and will continue to suffer the following special damages:

- a. injury to his reputation;
- b. mental anguish, embarrassment and anxiety;
- c. fear of physical injury to himself and members of his family;
- d. the loss of the value of his time required to be diverted from his professional responsibilities;
- e. the cost of defending against EPSTEIN's spurious and baseless claims.

WHEREFORE, EDWARDS demands judgment against EPSTEIN for compensatory damages, costs, and such other and further relief as the Court may deem appropriate under the circumstances. Counter/plaintiff, EDWARDS, having satisfied the statutory prerequisites for the assertion of a claim for punitive damages and having been granted leave of Court to assert such a claim does hereby also assert a claim for punitive damages.

Counter/plaintiff, EDWARDS, further demands trial by jury.

**COUNT II—MALICIOUS PROSECUTION**

18. This is an action for damages in an amount in excess of the minimum jurisdictional limits of this Court.

19. Counter/plaintiff, EDWARDS, is *sui juris*, resides in Broward County, Florida, and is an attorney licensed to practice in the State of Florida at all times material hereto.

20. Counter/defendant, EPSTEIN, is *sui juris* and is a resident of Palm Beach County, Florida.

21. EPSTEIN is a convicted felon having entered into a plea agreement pursuant to which he effectively conceded his having engaged in illicit sexual activity with a large number of female children over an extended period of time in violation of both State and Federal criminal laws.

22. EPSTEIN was sued civilly by a large number of his victims. Many of the cases against him have been settled, and upon information and belief, federal law enforcement agencies continue to investigate additional allegations of EPSTEIN'S serial abuse and molestation of children; others remain pending. As a consequence, EPSTEIN continues to face the potential of further criminal prosecution and huge civil judgments for both compensatory and punitive damages in favor of many victims of his depraved criminal exploitation of children including victims represented by EDWARDS.

23. In the face of overwhelming evidence of his guilt, EPSTEIN repeatedly asserted his Fifth Amendment Right against self-incrimination and refused to answer any substantive

questions regarding his sexual exploitation of his minor victims. Lacking any substantive defense to the claims against him, EPSTEIN sought to avoid his compensatory and punitive liability and to deter cooperation in the ongoing criminal investigation by employing the extraordinary financial resources at his disposal to intimidate his victims and their legal counsel into abandoning their legitimate claims or resolving those claims for substantially less than their just value.

24. While prosecuting the legitimate claims on behalf of his clients, EDWARDS has not engaged in any unethical, illegal, or improper conduct nor has EDWARDS taken any action inconsistent with the duty he has to vigorously represent the interests of his clients. EPSTEIN has no reasonable basis to believe otherwise and has never had any reasonable basis to believe otherwise.

25. Nevertheless, EPSTEIN filed civil claims against EDWARDS and EDWARDS' client, L.M. for the sole purpose of further attempting to intimidate EDWARDS, L.M., and others into abandoning or settling their legitimate claims for less than their just and reasonable value. His sole purpose in filing claims against EDWARDS was never the stated purpose of collecting money damages from EDWARDS since EPSTEIN knew that he had never suffered any damage as a consequence of any wrongdoing by EDWARDS. Nevertheless, EPSTEIN filed knowingly baseless and unsupportable claims against EDWARDS and proceeded to prosecute those baseless and unsupportable claims in order to divert EDWARDS from the prosecution of EDWARDS' legitimate claims against EPSTEIN, to require EDWARDS to expend time, energy and resources on his own defense, to embarrass EDWARDS and impugn his integrity, and deter

others with legitimate claims against EPSTEIN from pursuing those claims at the risk of having to fend off similar assaults. EPSTEIN's real purpose was to put pressure on EDWARDS, L.M., and other victims by publishing what amounts to nothing more than a highly defamatory press release issued under the cloak of protection of the litigation privilege.

26. EPSTEIN acted purely out of malice toward EDWARDS and others, and he had ulterior motives and purposes in filing his unsupported and unsupportable claims. EPSTEIN'S primary purpose in filing each of the claims against EDWARDS was to inflict a maximum economic burden on EDWARDS in having to defend against the spurious claims, to distract EDWARDS from the prosecution of claims against EPSTEIN arising out of EPSTEIN'S serial abuse of minors, and ultimately to extort EDWARDS into abandoning the claims he was prosecuting against EDWARDS.

27. The claims filed by EPSTEIN against EDWARDS were the following:

- a. violation of F.S. §§772.101, et. seq.—  
Florida Civil Remedies for Criminal Practices Act;
- b. Florida RICO—“Racketeer Influenced and Corrupt Organization Act”  
pursuant to F.S. §§895.01, et. seq.;
- c. abuse of process;
- d. fraud;
- e. conspiracy to commit fraud.

28. EPSTEIN, in his Complaint, directly alleged that EDWARDS was a knowing participant in a civil theft and criminal enterprise and that he had conspired to and did engage in

a fraud against EPSTEIN when EPSTEIN was well aware that there was and is absolutely no evidence whatsoever to support such false assertions. Indeed, his Complaint was replete with speculation, conjecture, and innuendo and was entirely devoid of factual support for his spurious allegations. Indicative of his total disregard for the lack of any predicate for his claims, EPSTEIN ignored the statutory requirement for written notice prior to the initiation of a civil theft claim.

29. EPSTEIN knew at the time of the filing of the specified claims and throughout his failed prosecution of those claims that he could not prosecute the claims to a successful conclusion because:

- a. they were both false and unsupported by any reasonable belief or suspicion that they were true;
- b. he had suffered no legally cognizable injury proximately caused by the falsely alleged wrongdoing on the part of EDWARDS;
- c. he had no intention of waiving his Fifth Amendment privilege against self-incrimination in order to provide the relevant and material discovery that would be necessary in the course of prosecuting the claims, (even if they had any reasonable basis), and he knew that his prosecution would consequently be barred by the sword-shield doctrine;
- d. EDWARDS' conduct in the prosecution of claims against EPSTEIN could not support the prosecution of a separate civil lawsuit against EDWARDS because of the absolute protection of the litigation privilege.

30. EPSTEIN acted purely out of malice toward EDWARDS and others, and he had ulterior motives and purposes in filing his unsupported and unsupportable claims as previously detailed in Paragraph 25.

31. EPSTEIN'S filing and prosecution of claims against EDWARDS recklessly and purposely disregarded the lack of justification for each of the claims and EPSTEIN never had as his primary purpose to establish what he did consider or reasonably could have considered to be meritorious claims.

32. After unsuccessful efforts to defend and amend his maliciously filed and prosecuted claims over a period of almost two years, EPSTEIN abandoned each of the claims described in Paragraph 27 except for an ongoing effort to salvage his abuse of process claim. That abandonment brings to successful conclusion EDWARDS' defense against each of the other abandoned claims and constitutes a specific bona fide termination in EDWARDS' favor of the prior prosecution of each abandoned claim.

33. As a result of EPSTEIN's wrong conduct as alleged, EDWARDS has suffered and will continue to suffer the following special damages:

- a. injury to his reputation;
- b. mental anguish, embarrassment and anxiety;
- c. fear of physical injury to himself and members of his family;
- d. the loss of the value of his time required to be diverted from his professional responsibilities;
- e. the cost of defending against EPSTEIN's spurious and baseless claims.

WHEREFORE, EDWARDS demands judgment against EPSTEIN for compensatory damages, costs, and such other and further relief as the Court may deem appropriate under the circumstances. Counter/plaintiff, EDWARDS, having satisfied the statutory prerequisites for the assertion of a claim for punitive damages and having been granted leave of Court to assert such a claim does hereby also assert a claim for punitive damages.

Counter/plaintiff, EDWARDS, further demands trial by jury.

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 9<sup>th</sup> day of January, 2013.



JACK SCAROLA  
Florida Bar No.: 169440  
Primary E-mail: [jsx@searcylaw.com](mailto:jsx@searcylaw.com)  
Secondary E-mail(s): [mep@searcylaw.com](mailto:mep@searcylaw.com)  
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

**COUNSEL LIST**

Jack A. Goldberger, Esquire  
jgoldberger@agwpa.com;  
smahoney@agwpa.com  
Atterbury, Goldberger & Weiss, P.A.  
250 Australian Avenue South, Suite 1400  
West Palm Beach, FL 33401  
Phone: (561)-659-8300  
Fax: (561)-835-8691  
Attorneys for Jeffrey Epstein

Bradley J. Edwards, Esquire  
bje.efile@pathtojustice.com;  
staff.efile@pathtojustice.com  
Farmer, Jaffe, Weissing, Edwards, Fistos &  
Lehrman, FL  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301  
Phone: (954) 524-2820  
Fax: (954) 524-2822

Fred Haddad, Esquire  
Dee@FredHaddadLaw.com;  
haddadfm@aol.com  
Fred Haddad, P.A.  
One Financial Plaza, Suite 2612  
Fort Lauderdale, FL 33394  
Phone: (954)-467-6767  
Fax: (954)-467-3599  
Attorneys for Jeffrey Epstein

Marc S. Nurik, Esquire  
marc@nuriklaw.com  
Law Offices of Marc S. Nurik  
One E Broward Blvd., Suite 700  
Fort Lauderdale, FL 33301  
Phone: (954)-745-5849  
Fax: (954)-745-3556  
Attorneys for Scott Rothstein

Lilly Ann Sanchez, Esquire  
lsanchez@thelsfirm.com  
The L-S Law Firm  
1441 Brickell Avenue, 15th Floor  
Miami, FL 33131  
Phone: (305)-503-5503  
Fax: (305)-503-6801  
Attorneys for Jeffrey Epstein

Tonja Haddad Coleman, Esquire  
tonja@tonjahaddad.com;  
Debbie@Tonjahaddad.com  
Tonja Haddad, P.A.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301  
Phone: (954)-467-1223  
Fax: (954)-337-3716  
Attorneys for Jeffrey Epstein

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendants.

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

CASE NO. 502009CA040800XXXXMBAG

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S ANSWER AND  
AFFIRMATIVE DEFENSES TO DEFENDANT/COUNTER-PLAINTIFF  
BRADLEY EDWARDS' COUNTERCLAIM**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Rule 1.110 of the *Florida Rules of Civil Procedure*, hereby files his Answer and Affirmative Defenses to Defendant/Counter-Plaintiff Bradley Edwards' ("Edwards") Counterclaim, and states:

1. Epstein admits that the Counterclaim alleges an amount within the jurisdictional purview of the Court, but denies that Edwards is entitled to said amount.
2. Epstein is without knowledge as to Edwards' residential status, but admits that he is an attorney licensed to practice law in the State of Florida.
3. Epstein Denies that he is a resident of Palm Beach County, but admits the remaining allegations in Paragraph 3.
4. Epstein admits that he entered into a plea agreement that resulted in a felony conviction. Epstein further admits that the terms and conditions of the agreement speak for themselves. To the extent that Edwards has inaccurately summarized or interpreted any provision thereof in Paragraph 4 of his Counterclaim, Epstein denies the allegations.

5. Epstein admits that he was a party to civil actions brought forth by purported victims, and that civil actions to which Epstein was a party settled, but is without knowledge as to any further investigation by federal law enforcement, any pending civil cases against Epstein by any purported victims, and Edwards' relationship with any other purported victims and therefore denies these allegations and demands strict proof thereof.

6. Epstein admits that, at certain times in the litigation, he asserted his rights against self-incrimination as afforded to him by the Fifth Amendment to the United States Constitution. Epstein denies the remaining allegations contained in Paragraph 6 and demands strict proof thereof.

7. Epstein denies Paragraph 7, except for the allegation therein stating that Edwards is involved in pending litigation in Federal Court under the Federal Crime Victims' Right's Act.

8. Epstein denies each and every allegation contained in Paragraph 8 and demands strict proof thereof.

9. Epstein denies each and every allegation contained in Paragraph 9 and demands strict proof thereof.

10. Epstein denies each and every allegation contained in Paragraph 10 and demands strict proof thereof.

11. Epstein admits that the causes of action asserted by him against Edwards in Epstein's initial Complaint are listed in Paragraph 11 and its subparts. However, Edwards fails to either attach the Complaint to which he is referring or otherwise identify the Complaint from which he derives his assertion. To the extent that Edwards has

inaccurately summarized or interpreted any provision thereof in Paragraph 11 of his Counterclaim. Epstein denies the allegations.

12. Epstein admits that in his initial Complaint he asserted causes of action against Edwards as specifically stated in Paragraph 11 and its subparts, but denies that he has ever asserted a cause of action for Civil Theft against Edwards as alleged in Paragraph 12. To the extent that Edwards has inaccurately summarized or interpreted any provision of Epstein's "Complaint" in Paragraph 12 of his Counterclaim,<sup>1</sup> Epstein denies the allegations. Epstein further denies the remaining allegations contained in Paragraph 12 and demands strict proof thereof.

13. Epstein denies each and every allegation contained in Paragraph 13, including its subparts, and demands strict proof thereof.

14. Epstein denies each and every allegation contained in Paragraph 14 and demands strict proof thereof.

15. Epstein denies each and every allegation contained in Paragraph 15 and demands strict proof thereof.

16. Epstein denies each and every allegation contained in Paragraph 16 and demands strict proof thereof.

17. Epstein denies each and every allegation and claim for damages that is contained in Paragraph 17, including its subparts, and demands strict proof thereof.

18. Epstein admits that the Counterclaim alleges an amount within the jurisdictional purview of the Court, but denies that Edwards is entitled to said amount.

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<sup>1</sup> Edwards fails to attach a copy of Epstein's Complaint or even reference the version of the Complaint to which he refers in this allegation.

19. Epstein is without knowledge as to Edwards' residential status, but admits that he is an attorney licensed to practice law in the State of Florida.

20. Epstein Denies that he is a resident of Palm Beach County, but admits the remaining allegations in Paragraph 20.

21. Epstein admits that he entered into a plea agreement that resulted in a felony conviction. Epstein further admits that the terms and conditions of the agreement speak for themselves. To the extent that Edwards has inaccurately summarized or interpreted any provision thereof in Paragraph 21 of his Counterclaim, Epstein denies the allegations.

22. Epstein admits that he was a party to civil actions brought forth by purported victims, and that civil actions to which Epstein was a party settled, but is without knowledge as to any further investigation by federal law enforcement, any pending civil cases against Epstein by any purported victims, and Edwards' relationship with any other purported victims and therefore denies these allegations and demands strict proof thereof.

23. Epstein admits that, at certain times in the litigation, he asserted his rights against self-incrimination as afforded to him by the Fifth Amendment to the United States Constitution. Epstein denies the remaining allegations contained in Paragraph 23 and demands strict proof thereof.

24. Epstein denies each and every allegation contained in Paragraph 24 and demands strict proof thereof.

25. Epstein denies each and every allegation contained in Paragraph 25 and demands strict proof thereof.

26. Epstein denies each and every allegation contained in Paragraph 26 and demands strict proof thereof.

27. Epstein admits that the causes of action asserted by him against Edwards in Epstein's initial Complaint are listed in Paragraph 27 and its subparts. However, Edwards fails to either attach the Complaint to which he is referring or otherwise identify the Complaint from which he derives his assertion. To the extent that Edwards has inaccurately summarized or interpreted any provision thereto in Paragraph 27 of his Counterclaim, Epstein denies the allegations.

28. Epstein admits that in his initial Complaint he asserted causes of action against Edwards as specifically stated in Paragraph 27 and its subparts, but denies that Epstein has ever asserted a cause of action for Civil Theft against Edwards as alleged in Paragraph 28. To the extent that Edwards has inaccurately summarized or interpreted any provision of Epstein's "Complaint" in Paragraph 28 of his Counterclaim,<sup>2</sup> Epstein denies the allegations. Epstein denies the remaining allegations contained therein and demands strict proof thereof.

29. Epstein denies each and every allegation contained in Paragraph 29, including its subparts, and demands strict proof thereof.

30. Epstein denies each and every allegation contained in Paragraph 30 and demands strict proof thereof.

31. Epstein denies each and every allegation contained in Paragraph 31 and demands strict proof thereof.

32. Epstein admits that he has Amended his Complaint over the course of this litigation, and submits that while some counts were dismissed by the Court, *without prejudice*, this constitutes neither abandonment of Epstein's claims nor a bona fide

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<sup>2</sup> Edwards fails to either attach the Complaint to his Counterclaim or reference the specific Complaint to which he is referring in Paragraph 28.

termination thereof. As such, Epstein denies the remaining allegations contained in Paragraph 32 and demands strict proof thereof.

33. Epstein denies each and every allegation and claim for damages that is contained in Paragraph 33, including its subparts, and demands strict proof thereof.

### **AFFIRMATIVE DEFENSES**

#### **FIRST AFFIRMATIVE DEFENSE**

For his First Affirmative Defense, Epstein states that Edwards' Abuse of Process claim fails to state a claim upon which relief can be granted as is required under Rule 1.110 of the *Florida Rules of Civil Procedure*. Edwards did not, nor will he ever be able to, assert the three requisites required to properly plead same; to wit: 1) an illegal, improper, or perverted use of process *after it issues* (i.e., improper willful acts during the course of *a prior action or after the filing of the Complaint*); 2) an ulterior motive or purpose in exercising the illegal, improper, or perverted process; and 3) damages resulting therefrom. *S & I Inv. v. Payless Flea Mkt., Inc.*, 36 So. 3d 909, 917 (Fla. 4th DCA 2010) (emphasis added); *Della-Donna v. Nova Univ., Inc.*, 512 So. 2d 1051, 1055 (Fla. 4th DCA 1987).

#### **SECOND AFFIRMATIVE DEFENSE**

For his Second Affirmative Defense, Epstein states that Edwards' Malicious Prosecution claim fails to state a claim upon which relief can be granted as is required under Rule 1.110 of the *Florida Rules of Civil Procedure*. Specifically, the requisite of a "bona-fide termination of the original proceeding in favor of the present plaintiff" as delineated by the Florida Supreme Court as one of the legally-mandated elements to bring forth a Malicious Prosecution claim, has not been, nor can it be, satisfied. See

*Alamo rent-A-Car v. Mancusi*, 632 So. 2d 1352, 1355 (Fla. 1994). The “original proceeding” to which Edwards refers in his Counterclaim is, in fact, the current litigation that is pending against him; to which there has not been an “ending in a manner indicating [Edwards’] innocence of the charges or allegations contained in the first suit.” *See Doss v. Bank of America, N.A.*, 857 So. 2d 991, 994 (Fla. 5th DCA 2003). *See also Yoder v. Adriatico*, 459 So. 2d 449, 451 (Fla. 5th DCA 1984) (stating that the tort of malicious prosecution requires, as an element, the prior termination of that claim and therefore malicious prosecution may not be brought as a counterclaim).

Indeed, it is well-settled law that an action for Malicious Prosecution cannot be filed until the original action is concluded, and that counts of a Complaint that are dismissed *without prejudice* are not deemed a “bona fide termination” in that party’s favor. “Where dismissal is on technical grounds, for procedural reasons, or any other reason not consistent with the guilt of the accused, it does not constitute a favorable determination.” *Union Oil of California v. John Watson*, 468 So. 2d 349 (3d DCA 1985). Accordingly, Edwards fails to state a claim upon which relief may be granted.

### THIRD AFFIRMATIVE DEFENSE

For his Third Affirmative Defense, Epstein states that Edwards’ Counterclaim fails to properly plead his damages as required as required under the *Florida Rules of Civil Procedure*. *See Miami National Bank v. Nunez*, 541 So. 2d 1259, 1260 (Fla. 3d DCA 1989) (stating that a litigant cannot recover as damages his own time for participating in a litigation when counsel is engaged to represent him). Edwards further pleads damages for injury to his reputation, mental anguish, anxiety, and embarrassment, which are impermissible and improperly plead.

Most importantly, however, Epstein submits that Edwards has not, nor will he, suffer any damages as a result of any actions allegedly taken by Epstein. In fact, Edwards still utilizes his litigious association with Mr. Epstein at his new firm Farmer, Jaffe, Weissing, Edwards, Fistos, & Lehrman to disparage Epstein, to seek new clients on whose behalf he can sue Epstein, to attract additional plaintiffs for whom he can file suit, and to achieve notoriety with the press. *See Composite Exhibit A attached hereto.*

#### **FOURTH AFFIRMATIVE DEFENSE**

For his Fourth Affirmative Defense, Epstein asserts that he is afforded absolute immunity pursuant to the "Litigation Privilege" because at all times his actions were connected with, relevant to, and material to, his cause of action against Edwards. The Litigation Privilege protects actions taken that are functionally tied to the judicial proceeding, and "arises immediately upon the doing of any act required or permitted by law in the due course of the judicial proceedings or as necessarily preliminary thereto." *Fridovich v. Fridovich*, 598 So. 2d 65 (Fla. 1992). Epstein has **not taken any action** "outside the context of the judicial proceeding, such as...actions extrinsic to the litigation." *Suchite v. Kleppin*, 2011 WL 1814665, p.\*3 (S.D. Fla. 2011) (citing to *American Nat. Title & Escrow of Florida, Inc. v. Guarantee Title & Trust, Co.*, 748 So. 2d 1054, 1056 (Fla. 4th DCA 1999)); See also, *Montejo v. Martin Memorial Medical Center, Inc.*, 935 So. 2d 1266, 1269 (Fla. 4th DCA 2006).

Defendant specifically reserves the right herein to amend these defenses and plead other affirmative defenses that may become known during his continuing investigation of this action and during discovery in this case.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served,

via electronic and US Mail, to all parties on the attached service list, this July 31, 2012.



Tonja Haddad Coleman, Esq.  
Florida Bar No.: 176737  
Tonja Haddad, PA  
524 South Andrews Avenue  
Suite 200N  
Fort Lauderdale, Florida 33301  
954.467.1223  
954.337.3716 (facsimile)  
Attorneys for Plaintiff

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SERVICE LIST

CASE NO. 502009CA040800XXXXMBAG

Jack Scarola, Esq.  
Searcy Denney Scarola et al.  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409

Jack Goldberger, Esq.  
Atterbury, Goldberger, & Weiss, PA  
250 Australian Ave. South  
Suite 1400  
West Palm Beach, FL 33401

Marc Nurik, Esq.  
1 East Broward Blvd.  
Suite 700  
Fort Lauderdale, FL 33301

Bradley J. Edwards, Esq.  
Farmer Jaffe Weissing Edwards Fistas Lehrman  
425 N Andrews Avenue  
Suite 2  
Fort Lauderdale, Florida 33301

Lilly Ann Sanchez, Esq.  
LS Law Firm  
Four Seasons Tower  
15th Floor  
1441 Brickell Avenue  
Miami, Florida 33131

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL  
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO. 50 2009CA040800XXXXMB AG  
Complex Litigation, Fla.R.Civ.Pro. 1201

JEFFREY EPSTEIN,  
Plaintiff,  
-vs- VOLUME II OF II

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

Defendants.

VIDEOTAPED DEPOSITION OF BRADLEY J. EDWARDS, ESQUIRE

Tuesday, March 23, 2010  
10:00 - 5:07 p.m.

2139 Palm Beach Lakes, Boulevard  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting  
Job No.: 1333

1 APPEARANCES:  
2 On behalf of the Plaintiff:  
3 ROBERT D. CRITTON, JR., ESQUIRE  
4 BURMAN, CRITTON, LUTTNER & COLEMAN, LLP  
5 303 Banyan Boulevard  
Suite 400  
West Palm Beach, Florida 33401  
Phone: 561.842.2820

6 and  
7 JACK ALAN GOLDBERGER, ESQUIRE  
8 ATTIBURY, GOLDBERGER & WEISS, P.A.  
9 250 Australian Avenue South  
Suite 1400  
10 West Palm Beach, Florida 33401-5012  
Phone: 561.659.8300

11 and  
12 On behalf of the Plaintiff:  
13 ALAN M. DERSHOWITZ, ESQUIRE  
14 HARVARD LAW SCHOOL  
15 Hauser 520  
Cambridge, Massachusetts 02138  
Phone: 617.496.2020  
16 On behalf of the Defendant:  
17 JACK SCAROLA, ESQUIRE  
18 SEARCY, DENNEY, SCAROLA,  
BARNHART & SHIPLEY, P.A.  
2139 Palm Beach Lakes Boulevard  
West Palm Beach, Florida 33409  
Phone: 561.686.6300

21 ALSO PRESENT:  
22 Jeffrey Epstein  
23 Joseph Kozak, Videographer  
24 Prose Reporting Services

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EXAMINATION DIRECT CROSS REDIRECT  
CONTINUED EXAMINATION OF  
BRADLEY J. EDWARDS, ESQUIRE  
BY MR. CRITTON 151

EXHIBITS

EXHIBIT	DESCRIPTION	PAGE
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PLAINTIFF'S EX. 2	COMPLAINT	239
PLAINTIFF'S EX. 3	JULY 22, 2009 FACSIMILE	276

PROCEEDINGS

THE VIDEOGRAPHER: We're now on the record  
at 1:54 p.m. Volume 2.

CONTINUED DIRECT EXAMINATION  
BY MR. CRITTON:

Q. Mr. Edwards, when we broke, we were  
talking a little bit about, we were talking about  
George Rush and different, many people that you had  
spoken with and you said you had spoken with  
Mr. Rush approximately five times, correct?

A. Correct.

Q. With regard to Mr. Rush, did you ever  
provide him with any documents?

A. I don't believe so.

Q. Did you tell Mr. Rush, did you EVER advise  
or did Mr. Rush ever ask you who your clients were,  
I mean not by name but as to how your clients  
factored into any of the conversations that you were  
having?

A. I don't remember that.

Q. Do you recall discussing with Mr. Rush  
Ghislaine Maxwell? Or in fact, let me ask it this  
way: Did you talk with Mr. Rush about Ghislaine  
Maxwell in any way?

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1 A. I'm not sure.  
 2 Q. Why would you -- did any of your clients  
 3 claim or have any of your clients claimed to have  
 4 any contact with Ghislaine Maxwell at all?  
 5 A. That is something that certainly calls for  
 6 attorney-client privilege and not something that I am  
 7 going to be answering today.  
 8 Q. With regard to at least you have attended  
 9 the deposition of both Jane Doe and of L.M., correct?  
 10 A. Yes.  
 11 Q. Okay. And have you heard them reference  
 12 Ghislaine Maxwell during the course of those  
 13 depositions?  
 14 A. No.  
 15 Q. Would it be a correct statement that none  
 16 of the three of your clients -- let's take a look at  
 17 the two that have testified. Both of the two that  
 18 have testified, Jane Doe and L.M. have testified  
 19 that they did not ever take travel with or were  
 20 transported in any way by Mr. Epstein, correct?  
 21 A. No, that is incorrect.  
 22 Q. Okay. Did, who, which?  
 23 A. I believe.  
 24 Q. I am sorry?  
 25 A. I guess the transcript will speak for itself.

1 I don't remember their specific --  
 2 Q. Is it your belief that Jane Doe ever  
 3 traveled with Mr. Epstein on his plane?  
 4 MR. SCAROLA: Excuse me, is the question  
 5 limited to the testimony --  
 6 MR. CRITTON: Correct.  
 7 MR. SCAROLA: -- that has been given?  
 8 MR. CRITTON: Correct.  
 9 THE WITNESS: No. I do not believe she  
 10 testified that she traveled with Mr. Epstein on  
 11 his plane.  
 12 BY MR. CRITTON:  
 13 Q. All right. And same would be true with  
 14 L.M., she did not testify that she traveled with Mr.  
 15 Epstein on his plane, true?  
 16 A. I believe that's true as well.  
 17 Q. Okay. Are you aware of any other  
 18 information from any other source that either Jane  
 19 Doe or L.M. traveled on Mr. Epstein's plane?  
 20 A. No.  
 21 Q. Did you, did you indicate to -- well, let  
 22 me strike that. Did you tell Mr. Rush that none of  
 23 your clients had ever traveled with Mr. Epstein on  
 24 his plane or any, on his plane or with him in any  
 25 fashion, in any other manner?

1 A. I don't remember that subject coming up in the  
 2 conversations with Mr. Rush. Had he asked -- I, I don't  
 3 remember that conversation.  
 4 Q. You're not denying it. You are just  
 5 saying you don't remember it or are you --  
 6 A. Correct.  
 7 Q. -- saying it didn't happen?  
 8 A. No. I am saying I just don't remember.  
 9 Q. Did you, did you tell Mr. Rush that  
 10 Mr. Epstein had transported females on his plane for  
 11 the purposes of having sex with other individuals?  
 12 A. I don't know.  
 13 Q. Well, why --  
 14 A. I just don't remember.  
 15 Q. If Mr. Rush would testify that you told  
 16 him that other females had traveled on Mr. Epstein's  
 17 plane and had had sex during the time they were on  
 18 the planes, why would you have had that discussion  
 19 with him?  
 20 A. You're asking a hypothetical if I said that,  
 21 why would have I have said that?  
 22 Q. Well, let me rephrase it this way: With  
 23 Mr. Rush, if I asked you to assume that he would  
 24 testify that you, you told him about the  
 25 transportation, that Mr. Epstein transported other

1 women on the plane to have sex with them, what  
 2 information did you have that was the basis for that  
 3 claim at that time?  
 4 MR. SCAROLA: I am going to object to the  
 5 form of the question. It assumes facts not in  
 6 evidence. It has no proper predicate.  
 7 BY MR. CRITTON:  
 8 Q. Mr. Edwards, did you have Ghislaine  
 9 Maxwell served in this case with a subpoena?  
 10 A. Yes.  
 11 Q. For what purpose? I mean, obviously to  
 12 take her deposition.  
 13 A. Exactly, to take her deposition.  
 14 Q. All right. Do you, is she neither, would  
 15 you agree that neither Jane Doe nor L.M. have  
 16 testified to any, that they had any connection  
 17 whatsoever with Ghislaine Maxwell?  
 18 A. Yes, I would agree.  
 19 Q. And what, what was, what is the purpose;  
 20 that is, with regard to your three clients and only  
 21 your three clients is they -- what connection if  
 22 any, did Ghislaine Maxwell have to those  
 23 individuals?  
 24 MR. SCAROLA: Objection, work-product.  
 25 Instruct you to not answer.

1 BY MR. CRITTON:

2 Q. When you originally started working with  
 3 the Rothstein firm, did you have any discussions  
 4 with Mr. Rothstein regarding how your cases would be  
 5 funded; that is, your personal, your personal injury  
 6 cases and specifically the cases relating to  
 7 Mr. Epstein?

8 A. No.

9 Q. Okay. With regard to, prior to taking  
 10 your cases to, prior to starting at RRA, you were  
 11 responsible for the funding of your personal injury  
 12 cases or any contingency fee case, correct?

13 A. Right.

14 Q. And I assume you had either your own  
 15 personal funds or you had a line of credit or both?

16 A. Right.

17 Q. And when you came to RRA and you brought  
 18 the cases with you; that is, the personal injury  
 19 cases and as well, the Epstein cases, were you  
 20 reimbursed for the costs that you had already  
 21 expended thus far on those cases?

22 A. No.

23 Q. Did you request that you be reimbursed?

24 A. Yes.

25 Q. And with, to whom was the request made?

1 A. Directly to Scott Rothstein.

2 Q. Was that at the ten minute meeting that  
 3 you had?

4 A. Yes.

5 Q. At BOVA?

6 A. Yes.

7 Q. And what did he say?

8 A. No problem.

9 Q. He said he would reimburse you?

10 A. Correct.

11 Q. And did that, in fact, take place?

12 A. No.

13 Q. And how did you attempt to get reimbursed  
 14 for the costs that you had thus far incurred on your  
 15 personal injury cases including Mr. Epstein's case  
 16 when you went, when you started at RRA?

17 A. What do you mean?

18 Q. Well, you said that Mr. Rothstein agreed  
 19 in the ten minute conversation that RRA would  
 20 reimburse those costs?

21 A. Correct.

22 Q. You go to RRA in April of '09, and I  
 23 assume you had to ask someone and say, look, I had a  
 24 conversation with Scott Rothstein. He said he would  
 25 reimburse my costs.

1 A. I didn't do that.

2 Q. You didn't. Did you choose not to do  
 3 that?

4 A. No. I, I, the statement was made to me by  
 5 Scott Rothstein that the costs would be reimbursed. And  
 6 I anticipated that the costs would be reimbursed. I was  
 7 there for a fairly short period of time and I didn't  
 8 know Scott Rothstein personally. So, I didn't go to him  
 9 additionally to tell him something that we already had a  
 10 meeting of the minds about.

11 Q. Well, how much in costs did you have  
 12 outstanding at the time from your cases, including  
 13 the Epstein cases when you went to the firm, RRA, in  
 14 April of '09?

15 A. I don't know the total.

16 Q. Was it \$1,000? Was it \$50,000? Was it  
 17 \$100,000?

18 A. More than 100.

19 Q. And did you have that both from, was it,  
 20 the debt, was that comprised of both your own money  
 21 and as well as LOC, line of credit money through a  
 22 bank?

23 A. Correct.

24 Q. Was it more than 150?

25 A. I'm not sure.

1 Q. Was it someplace between 100 and \$200,000  
 2 your best estimate?

3 A. That is my best estimate.

4 Q. Did you find that to be a significant  
 5 amount of money?

6 A. Of course.

7 Q. Okay. And you said you were at RRA for  
 8 only a short period of time. In fact, you were  
 9 there April, May, June, July, August, September,  
 10 October. You were there seven months, true?

11 A. Yes.

12 Q. Okay. And at no time, even though  
 13 Mr. Rothstein said he would reimburse those funds or  
 14 the firm would reimburse those funds to you, at no  
 15 time during those seven months which you have  
 16 described as a short period of time, did you ever  
 17 make a request that you be reimbursed; is that  
 18 correct?

19 A. I never made a, well, I don't know the process  
 20 for getting reimbursed, but I never made a formal  
 21 request. I said it to, at least to Russell Adler on  
 22 several occasions. And it was always told to me, don't  
 23 worry about it; the firm is growing; there is a lot of  
 24 things to deal with right now; he operates under the  
 25 system of fairness; you will get reimbursed.

1 And obviously nobody expected the ending  
 2 to the law firm that ultimately occurred.

3 Q. With regard to the case, I assume you  
 4 settled a couple of personal injury cases during the  
 5 seven months you were there, yes?

6 A. Yes, you assume that.

7 Q. That's correct? Let me ask the question.  
 8 Did you settle any contingency fee cases during the  
 9 sevens months that you were at the RRA firm?

10 A. Yes.

11 Q. And when you settled those cases did you,  
 12 and they closed, they were settled through, did you  
 13 have any control of the trust account?

14 A. No.

15 Q. Okay. Settlement monies come in on a  
 16 personal injury case. What did you do with the  
 17 money once the, once the client had endorsed the  
 18 check?

19 A. I, I didn't personally do anything with the  
 20 money. It was not handled by me.

21 Q. Okay. Were you there --

22 A. That's why I'm confused. Did I settle the  
 23 case? I mean, Rothstein Rosenfeldt Adler firm settled  
 24 personal injury cases while I was there. There were no  
 25 cases that were solely my cases. They were firm cases.

1 Q. Let me rephrase the question. You  
 2 brought, you brought cases to the firm, correct?

3 A. That is correct.

4 Q. Of any of the cases that you brought, did  
 5 you settle those cases?

6 A. No.

7 Q. Okay. So, you never had an instance -- so  
 8 there was never a set of circumstances where you  
 9 would have been reimbursed for costs as a result of  
 10 a settlement?

11 A. That's correct.

12 Q. All right. And, and so during the seven  
 13 months that you were there, you were never  
 14 reimbursed a nickel of the one to \$200,000 that you  
 15 had outstanding in costs?

16 A. That is correct.

17 Q. All right. With regard to the costs that  
 18 were to be incurred for prosecuting the cases,  
 19 specifically the Epstein cases, what was your  
 20 understanding -- was that ever discussed with  
 21 Mr. Rothstein at the ten-minute meeting?

22 A. Repeat that. I'm sorry.

23 Q. Sure. How were, how were costs  
 24 investigation costs, deposition costs, travel  
 25 expenses to be reimbursed?

1 A. Well, you've thrown a lot of things in there.  
 2 Travel expenses come back with your receipts, hand them  
 3 over to, I would hand them over to my secretary. And  
 4 she would get them to the appropriate place in the  
 5 machine known as Rothstein Rosenfeldt Adler. And in my  
 6 next -- and I would get a check, I believe.

7 Q. All right. How about depositions, I mean  
 8 during the time that we, we took depositions from  
 9 the time you were at RRA, transcripts were ordered  
 10 of depositions. They were expedited of various  
 11 hearings. You took trips. You took a trip to New  
 12 York to take the deposition of Mark Epstein,  
 13 correct; all those things occurred?

14 A. Yes, all of those things occurred.

15 Q. So, when you would get a bill in for the  
 16 trip for to go up and see Mark Epstein, or to take  
 17 Mark Epstein's deposition, you had travel costs  
 18 associated with that and you had plane fare,  
 19 taxicab, hotel, whatever else you had, correct?

20 A. I had costs associated with that.

21 Q. All right. And when you met with Mr.  
 22 Rothstein initially, what was your understanding or  
 23 did you have an understanding as to how costs would  
 24 be handled; that is, how they would be paid on cases  
 25 that you brought to the firm?

1 A. It was unspoken but I had some understanding  
 2 just based on logic.

3 Q. Separate and apart from logic, did anybody  
 4 tell you that you had; that is, that RRA would pay  
 5 all of the costs associated with prosecution of the  
 6 Epstein cases?

7 A. Did anybody tell me? No.

8 Q. Okay. Were you ever required to draw  
 9 against either your personal funds or your personal  
 10 LOC after you started with RRA to fund the Epstein  
 11 cases?

12 A. I don't know how to answer your question,  
 13 Mr. Critton, because if I were to go out of town and  
 14 purchase a plane ticket, yeah, I would purchase that  
 15 personally and then I would be reimbursed. If I ordered  
 16 a deposition transcript, which is a totally different  
 17 category, that gets billed to the firm. I never see the  
 18 bill or anything else. So, you're just throwing a bunch  
 19 of things together that don't necessarily go together.  
 20 I am trying my best for you.

21 Q. No, that's fine. Commonly in a personal  
 22 injury closing, you would see the recover, you would  
 23 see a list of the costs. The costs would include  
 24 court reporters, investigation fees, subpoenas,  
 25 things of that nature, correct?

1 A. I have seen them before, yes, sir.  
 2 Q. Okay. And as well there would be  
 3 reimbursable expenses such as when you went to New  
 4 York and took Mark Epstein's deposition. You, you  
 5 paid for the expense up front but, in fact, it was  
 6 then reimbursed by the firm, correct?

7 A. Now we're specifically, specifically talking  
 8 about Mark Epstein's deposition, yes, that, what you  
 9 just said is correct.

10 Q. Okay. Not only was the, and if I  
 11 understand your testimony is the deposition was paid  
 12 for directly by the firm. With regard to your  
 13 travel, any hotel, other expenses that you had, you  
 14 put in a request for reimbursement and the firm  
 15 would reimburse you?

16 A. Correct.

17 Q. All right. And with regard to those  
 18 costs, you said you and Mr. Rothstein never had a  
 19 discussion about that; is that correct?

20 A. Correct.

21 Q. All right. But you did speak with  
 22 Mr. Adler about how costs would be handled on your  
 23 cases including Mr. Epstein's case after you started  
 24 with RRA?

25 A. Correct.

1 Q. Okay. And is he the only one who  
 2 explained what the procedure was?

3 A. Yes.

4 Q. And what did he tell you? Well, let me  
 5 ask you this: Did he tell you what; that is, that  
 6 the firm would pay for all of the reimbursements  
 7 either costs and/or reimbursements for costs that  
 8 were incurred in prosecuting the Epstein files and  
 9 any other files that you had?

10 A. Can you split this question up so that we're  
 11 not talking about reimbursement and costs and things  
 12 like that.

13 Q. Sure. With regard to costs such as  
 14 depositions --

15 A. Okay.

16 Q. -- court reporters, court reporter fees,  
 17 video depositions, transcripts of hearing, whether  
 18 they were expedited or whether they were asked on a  
 19 routine basis?

20 A. Right.

21 Q. Where would the -- who was responsible for  
 22 paying those bills?

23 A. The bills would, to my to the best of my  
 24 knowledge would be billed to the law firm of Rothstein  
 25 Rosenfeldt Adler, and it would be their financial

1 responsibility to pay those bills.

2 Q. And is that what Russell Adler told you?

3 A. Yes.

4 Q. Did you ever discuss that with anyone else  
 5 in the firm or just Russell Adler?

6 A. Just Russell Adler.

7 Q. So, if the bill came in for one of those  
 8 types of costs, you would give to your secretary or  
 9 would she handle it automatically?

10 A. I never would see the bill. Why would it come  
 11 into my name? It just didn't do -- that never happened.  
 12 It was billed to Rothstein Rosenfeldt Adler.

13 Q. So, you would never see the bill that came  
 14 in?

15 A. Correct.

16 Q. -- even if it was a RRA attention Brad  
 17 Edwards, you wouldn't see that?

18 A. Presuming that happened, attention, Brad  
 19 Edwards, I still never saw it. No, I never saw a bill  
 20 to my recollection right now the whole time I was at  
 21 Rothstein Rosenfeldt Adler.

22 Q. Did Mr. Rothstein ever discuss with you  
 23 whether there would be a budget associated with how  
 24 much money you could spend on a particular case?

25 A. No.

Q. Okay. Did anyone at the firm ever talk to  
 you about whether or not there would be a budget  
 associated with how much you could spend on an  
 Epstein case or any personal injury case?

A. No.

Q. In terms of authorization, if you wanted  
 to order a deposition expedited or if you wanted to  
 pay for a specific expense, whether it was an  
 outside investigator or to send an investigator to a  
 location, whose decision was that? Is that you and  
 you alone to incur that cost?

A. Which question do you want me to -- you asked  
 a bunch of things there that some of them may have been  
 my decision. Other parts of that would obviously be  
 somebody else's. But you're throwing five or six items  
 in there and you want me to give you an answer.

Q. Let me break it them down. With regard to  
 any costs that you wanted to incur, incur relating  
 to a Jeffrey Epstein matter, was there an  
 authorization process; that is, did you have to get  
 someone's okay before you could spend X amount of  
 dollars?

A. No.

Q. Okay. It was, and who told you that you  
 never had to get an approval for any expense

1 associated with the Jeffrey Epstein case?

2 A. I didn't say that anybody did. So, no,  
3 nobody, nobody.

4 Q. You could just spend whatever money you  
5 wanted to in prosecuting your cases; is that  
6 correct?

7 A. No, I didn't say that either.

8 Q. What was the procedure then?

9 A. That if I was at a deposition and there was a  
10 need in my judgment for the transcript to be expedited  
11 then I would order it expedited and nobody ever told me  
12 that they had a problem with my judgment as to those  
13 things. And not as to those things. As to that thing  
14 which we were talking about which right now is  
15 expediting deposition transcripts.

16 Q. With regard to -- so any, how about an  
17 expense associated with hiring, with either  
18 directing -- well, let me strike that. With regard  
19 to Epstein, did, were you ever required or did you  
20 ever hire outside investigators to do work  
21 associated with the Epstein case?

22 By outside I mean someone who was not an  
23 employee of RRA and now I mean dealing with the time  
24 that you were at RRA

25 A. Right. And your question is did I ever hire

1 Q. Did you meet, did you know Mr. Fisten  
2 before you started working at RRA?

3 A. Same answer, no.

4 Q. No. All right. And Mr. Fisten, did you  
5 direct Mr. Fisten to do investigations in Martha's  
6 Vineyard?

7 A. No.

8 Q. Did you direct Mr. Fisten to do  
9 investigations in California?

10 A. I directed Mr. Fisten to interview people and  
11 ultimately it was learned that they lived in California.

12 Q. And did Mr. Fisten go to California to  
13 interview those individuals?

14 A. To the best of my knowledge he did.

15 Q. Okay. And who did he go and interview?

16 MR. SCAROLA: That is work-product and I  
17 instruct you not to answer.

18 BY MR. CRITTON:

19 Q. Did Mr. Fisten interview a person by the  
20 name of Michael Sanka (phonetic)?

21 MR. SCAROLA: That is work-product and I  
22 instruct you not to answer.

23 MR. CRITTON: Did Mr. Fisten interview a  
24 individual by the name of Michael Friedman  
25 (phonetic)?

1 an outside investigator to perform work on Jeffrey  
2 Epstein's case?

3 Q. Correct?

4 A. The answer is no.

5 Q. Were, were all the investigations that  
6 were done during the time that you were employed by  
7 RRA, were they done by in-house investigators?

8 A. I don't know.

9 Q. Well, if you wanted investigation done on  
10 Mr. Epstein, how would you go about authorizing that  
11 or directing that that be done?

12 A. I would ask one of the investigators to do it.

13 Q. So, you would direct the specific  
14 investigator?

15 A. Yeah. There were plenty of times where I  
16 directed the specific investigator. I want you to talk  
17 to this witness or so-and-so, yes, just like you would  
18 in any case.

19 Q. In this particular instance associated  
20 with Mr. Epstein, what investigators worked on  
21 Mr. Epstein's case during the time you were at RRA?

22 A. If you want an exclusive list, I don't know.

23 Q. I want to know?

24 A. I can tell you Michael Fisten did because I  
25 communicated with him directly.

1 MR. SCAROLA: That is work-product and I  
2 instruct you not to answer --

3 MR. CRITTON: Mr. Fisten --

4 MR. SCAROLA: -- except to the extent as  
5 may have already been disclosed to the defense  
6 in any of the three cases that are currently  
7 pending. Any and all questions about  
8 investigative work will meet with the same  
9 objection and same instruction.

10 BY MR. CRITTON:

11 Q. Did you direct Mr. Fisten that he could  
12 represent that he was an agent of the FBI in  
13 interviewing individuals in California?

14 A. Of course not.

15 Q. Did you -- and if in fact Mr. Fisten  
16 represented he was an agent of the FBI, you would  
17 find that reprehensible, true?

18 A. This is some hypothetical question that I do  
19 not believe exists.

20 Q. I'm asking you to assume that Mr. Fisten  
21 represented that he was an agent of the FBI. You  
22 would find that type of conduct by the investigator  
23 to be inappropriate, correct?

24 A. I'm not going to render an opinion on a  
25 hypothetical that doesn't exist.

1 Q. So, you're refusing to answer that  
2 question?  
3 A. You're asking me about my definition of  
4 reprehensible as it pertains to a specific hypothetical  
5 that you've just created.  
6 Q. Let me ask you --  
7 A. Now, you want me to try to analyze that  
8 particular hypothetical and tell you whether it meets  
9 the definition of reprehensible?

10 Q. I will let you -- if Mr. Fisten, if I ask  
11 you to assume that Mr. Fisten represented to a  
12 witness out in California that he was an agent or  
13 working for the FBI, would you find that conduct  
14 appropriate by Mr. Fisten?

15 MR. SCAROLA: And I will tell you that you  
16 are not obliged to answer hypothetical  
17 questions.

18 THE WITNESS: And therefore I am not going  
19 to answer that question.

20 BY MR. CRITTON:

21 Q. If Mr. Fisten represented that he was  
22 associated with the Miami-Dade Police Department,  
23 Miami-Dade County Police Department, would you find  
24 that conduct inappropriate?

25 MR. SCAROLA: Same instruction and I would

1 also observe with regard to each of the  
2 hypothetical questions that you are asked that  
3 they are incomplete. And without knowing all  
4 of the surrounding circumstances, it would be  
5 impossible for any witness to pass judgment  
6 upon what may have occurred.

7 BY MR. CRITTON:

8 Q. So, Mr. -- would it be a correct statement  
9 at least as you understood it, Mr. Edwards, that  
10 Mr. Fisten was not an agent, was not an FBI agent  
11 during the time that he worked for RRA?

12 A. You're asking me was he an FBI agent or did he  
13 work for RRA. He worked for RRA.

14 Q. Correct. He was not an FBI agent, true,  
15 to the best of your knowledge during the time he  
16 worked for RRA.

17 A. Okay.

18 Q. I am not talking about any other time  
19 period right now.

20 A. Okay. Then the answer is he was not an FBI  
21 agent at the time he was working for RRA.

22 Q. During the time he worked for RRA he as  
23 well was not associated with Miami-Dade Police  
24 Department, correct?

25 A. Oh, I don't know that.

1 Q. Could he -- is it your --  
2 A. How would I know associate, he may have been?  
3 Q. Let me ask you this, was he employed by  
4 the Miami-Dade Police Department in addition to RRA  
5 during the time he worked there?  
6 A. To the best of my knowledge, no.  
7 Q. Did -- with regard to Mr. Epstein's cases  
8 was there any type of cost account set up for, for  
9 them?  
10 A. I don't know.  
11 Q. Could you access any of the financial  
12 files within the RRA firm?  
13 A. No.  
14 Q. Could you access any files that were  
15 associated with your specific, excuse me, clients or  
16 your specific case such as if you wanted to know how  
17 much in costs had been incurred by Mr. Epstein -- on  
18 Jane Doe's case while at the RRA firm, could you  
19 request that, could you access that information?  
20 A. I don't know.  
21 Q. Did you ever try to access that  
22 information?  
23 A. No.  
24 Q. At any time did you request that anybody  
25 provide you copies of what the costs were associated

with Mr. Epstein's cases?

A. No.

Q. Since you left the firm have you requested  
any type of detailed billing or cost analysis such  
as to the cost of any of the costs that were  
incurred on any of Mr. Epstein's cases?

A. Of course.

Q. Okay. And did you receive those costs?  
Did you receive that information?

A. Yes.

Q. And what costs have been incurred in the  
cases, in the Epstein cases associated up -- let me  
strike that. What costs, what is the total amount  
of costs that were incurred in the Epstein cases  
during the time that those files existed in the RRA  
firm?

MR. SCAROLA: If you're able to answer  
that question with regard only as to amount  
without specifying any of the specific cost  
expenditures, then I think we can answer that  
question only as to amount.

THE WITNESS: And the question as to the  
aggregate in the three cases?

MR. CRITTON: Correct.

THE WITNESS: Because I can't delineate

1 for you.

2 MR. CRITTON: Your best estimate.

3 THE WITNESS: Okay. I believe more than  
4 \$300,000.

5 BY MR. CRITTON:

6 Q. With regard to, if investigation was done  
7 on, on a Epstein case, was the investigator charged,  
8 that is for his time, as an example Mr. Fisten, if  
9 he did work in California would his time, I'm not  
10 talking about his expenses, would that be billed as  
11 a cost to the file?

12 A. I don't know.

13 Q. On the cost that you received, well, let  
14 me strike that. If I understood it, up to 300,000  
15 approximately \$300,000 that's been spent on the  
16 Epstein file, were you able to look --

17 A. It would be more than that. I am just saying  
18 it's at least \$300,000.

19 Q. Something between three and \$400,000,  
20 could it --

21 A. Something that I would say is definitely  
22 between 300 and \$500,000, but I'm not sure. It could be  
23 301. It could be 450. I really don't know.

24 Q. When was the last time that you looked at  
25 that ledger or the printout associated with the

1 firm had you, you had spent some of your own money  
2 and/or LLC money on the files; is that correct?

3 A. That's correct.

4 Q. Approximately how much is that amount?

5 A. I'm, I'm not sure. I think as you're aware  
6 most of the depositions and costly work that was done on  
7 the files happened to have been done during that time  
8 period for all of the respective cases or claims against  
9 Mr. Epstein during that time period of last summer of  
10 2009.

11 Q. All right. But in terms of your costs  
12 prior to coming to RRA, what's your best estimate of  
13 the costs that you have paid either out of pocket or  
14 are responsible to a bank to repay?

15 A. I don't know.

16 Q. More than 25,000, less than 25,000?

17 A. I'm not sure.

18 Q. More than 100,000?

19 A. No.

20 Q. More than 50,000?

21 A. I don't know.

22 Q. That's a record obviously you could pull  
23 up, correct?

24 A. Correct.

25 Q. All right. Now, with regard to, prior to

1 Epstein files?

2 A. I have never looked at the printout.

3 Q. Okay. How, how do you know what is amount  
4 is then? That is how do you have the estimate of it  
5 being between 350, I'm sorry between 300 and  
6 \$500,000, the cost associated with Epstein?

7 A. I asked a paralegal within my current firm for  
8 the total amount of costs on these three cases that is  
9 being claimed by Rothstein Rosenfeldt Adler. And I  
10 remember the cost number in the aggregate being given to  
11 me reflecting an amount what I just told you.

12 Q. Have you requested a copy of the -- let me  
13 strike that. Did she say she had, that is did  
14 she -- did you actually receive a document that  
15 reflects the breakdown of the costs from the  
16 trustee?

17 A. I personally have not seen that.

18 Q. Okay. Has your firm received it?

19 A. I don't know.

20 Q. I assume -- would it be a correct  
21 statement that the three to \$500,000 is, includes  
22 only the time between April of '09 and October of  
23 '09 when you were with the firm?

24 A. It's a good question. I, I believe so.

25 Q. And approximately, prior to joining the

1 your coming to RRA, had there been any investigation  
2 work that you had done on the Epstein files -- and  
3 let me strike that. Had you hired or retained an  
4 investigator to do any work for you on the Epstein  
5 files prior to coming to RRA?

6 A. I don't think so.

7 Q. All right.

8 A. It would have been around that time. I don't  
9 remember whether the initial investigator was hired by  
10 me from my previous, from my solo firm or was hired by  
11 Rothstein Rosenfeldt Adler. I can't say.

12 Q. Who was the first investigator that you  
13 believe was involved in investigating the Epstein  
14 cases? Just a name not topic?

15 MR. SCAROLA: Work-product, instruct you  
16 not to answer.

17 BY MR. CRITTON:

18 Q. Was the first person that was retained as  
19 an investigator someone who ultimately became  
20 employed by RRA?

21 MR. SCAROLA: You can answer that.

22 THE WITNESS: No.

23 BY MR. CRITTON:

24 Q. The, the person who you hired to -- and by  
25 investigation I mean something other than looking up

1 an address to serve a subpoena or, or doing some  
2 minimal background.

3 A. I am glad you clarified because I am using  
4 that same definition.

5 Q. All right. So, it's, it's your best  
6 recollection that you did or did not hire an  
7 investigator to do real investigative work with,  
8 associated with Mr. Epstein prior to joining RRA?

9 A. I believe I did, but it was after a time when  
10 I had, I was contemplating or at least to myself had  
11 committed to going to RRA. So, it was within that time  
12 period I believe that I hired that person prior to RRA

13 Q. When you then went to -- now you had  
14 committed to go to RRA or at least mentally  
15 committed to go to RRA. As soon as you started with  
16 RRA, did you terminate the services of that  
17 investigator?

18 A. No.

19 Q. Did that investigator continue to do work?

20 A. Yes.

21 Q. Okay. Has, does he or she or it continue  
22 to do work today for you?

23 A. No. On Mr. Epstein's case you're asking,  
24 right?

25 Q. Yes, sir.

1 A. No.

2 Q. Okay. For how long a time period did that  
3 person continue to do the work before it got  
4 transferred to Mr. Fisten or other investigators?

5 A. Question doesn't make sense.

6 Q. Okay. How long did the investigator that  
7 you may have hired prior to joining RRA work on the  
8 Epstein files before you ceased that work after you  
9 started working for Epstein in April of '09? I'm  
10 sorry, for RRA in '09.

11 A. The person was hired in either March or April  
12 of 2009, which is why I can't say with absolute  
13 certainty whether I was at RRA or not. And that person  
14 continued to do investigative work in some capacity  
15 probably throughout the entire time that I was at RRA.

16 Q. Were all of the bills for that  
17 investigator paid by RRA?

18 A. Yes.

19 Q. With regard to the payments for the  
20 investigators -- well, let me strike that. Who  
21 other than Mr. Fisten from an investigator, from an  
22 internal investigator at RRA employee worked on  
23 doing investigation on the Epstein files?

24 MR. SCAROLA: Same objection, same  
25 instruction.

1 MR. CRITTON: You are claiming  
2 work-product?

3 MR. SCAROLA: Yes.  
4 BY MR. CRITTON:

5 Q. The investigators, did you understand them  
6 to be salaried employees of RRA?

7 A. I really have no idea.

8 Q. Did you ever ask them?

9 A. No.

10 Q. Do you know whether the, do you have any  
11 knowledge as to whether the investigators kept time  
12 records?

13 A. I do not have that knowledge.

14 Q. In terms of when an investigator would  
15 come back -- well, do you know how the investigators  
16 were paid?

17 A. With money.

18 Q. From RRA?

19 A. I would presume. Totally speculation.

20 Q. Would the RRA -- were the investigators  
21 for RRA bonused?

22 A. I have no idea.

23 Q. Did you ever discuss with Mr. Fisten what  
24 his financial compensation was associated with RRA?

25 A. No.

1 Q. Did, did you ever promise either  
2 Mr. Fisten or any other investigator that when the  
3 case settled, they would get a bonus from an Epstein  
4 case?

5 A. No.

6 Q. Okay. Did Mr. Fisten ever inquire of you  
7 as to whether he would get a bonus if, in fact, the  
8 cases on which he worked including the Epstein cases  
9 settled for a favorable verdict or result came in?

10 A. No.

11 Q. Did you have any understanding from either  
12 your conversations from Mr. Rothstein whether  
13 investigators were bonused based upon the work that  
14 they did?

15 A. Excuse me?

16 Q. Did you ever have an understanding from  
17 Mr. Rothstein that, that investigators would be  
18 bonused from cases on which they worked based upon  
19 their work product or their contribution?

20 A. No. I had no understanding.

21 Q. Did you, from -- I assume you've read a  
22 number of the news reports associated with  
23 Mr. Rothstein and the implosion of the firm?

24 A. Okay.

25 Q. I assume you have seen a number of them?

1 A. What do you mean by a number?  
 2 Q. More than one.  
 3 A. Yes, I have seen more than one.  
 4 Q. Have you seen articles were it's alleged  
 5 that investigators that were employed by Rothstein,  
 6 by RRA would go through the garbage of prospective  
 7 Defendants to search for incriminating or favorable,  
 8 incriminating evidence against the Defendant or  
 9 favorable evidence for a Plaintiff who might be  
 10 working or who might be a client of the firm?  
 11 A. I have not seen an article saying that. I  
 12 think I have heard your client say that before.  
 13 Q. Separate and apart --  
 14 A. Right.  
 15 Q. You don't have to rely on anything my  
 16 client has said before, the testimony --  
 17 MR. SCAROLA: I am sure we won't.  
 18 MR. CRITTON: I am confident of that.  
 19 BY MR. CRITTON:  
 20 Q. In terms of, were you aware from the  
 21 articles, did you see in the article -- let me  
 22 strike that. Did you ever direct your investigators  
 23 to go through Mr. Epstein's trash?  
 24 MR. SCAROLA: I am going to object,  
 25 work-product, attorney-client privilege.

1 representing Mr. Epstein including myself?  
 2 MR. SCAROLA: Same objection, same  
 3 instruction.  
 4 BY MR. CRITTON:  
 5 Q. Did you ever?  
 6 MR. SCAROLA: Mr. Edwards will not answer  
 7 any questions regarding what he did or didn't  
 8 do.  
 9 MR. CRITTON: I understand. I just want  
 10 to make it certain it's for the court on some  
 11 of these issues.  
 12 MR. SCAROLA: Well, for the court I am  
 13 telling you he is not going to answer any of  
 14 those questions. And continuing to ask them in  
 15 light of the fact that we have told you and  
 16 made it clear the scope of our assertion of  
 17 privilege serves no useful purpose.  
 18 BY MR. CRITTON:  
 19 Q. Mr. Edwards, at any time, did you -- well,  
 20 let me strike that. Did you ever direct the  
 21 investigators to, during the time you were at RRA,  
 22 to conduct a surveillance on Mr. Epstein's property?  
 23 MR. SCAROLA: Same objection, same  
 24 instruction.  
 25

1 BY MR. CRITTON:  
 2 Q. Have you directed, did you ever direct --  
 3 this is the investigators during the time you were  
 4 at RRA and that's the question you're claiming the  
 5 privilege over, correct?  
 6 MR. SCAROLA: I am claiming the privilege  
 7 with respect to any action that was taken by  
 8 Mr. Edwards or at Mr. Edward's direction in --  
 9 MR. CRITTON: Tell you what, I will  
 10 withdraw the last question.  
 11 MR. SCAROLA: -- in connection with the  
 12 investigation in prosecution of the claims  
 13 against Mr. Epstein.  
 14 BY MR. CRITTON:  
 15 Q. Let me make my question clear,  
 16 Mr. Edwards. With regard to your investigators, you  
 17 gave direction with regarding the Epstein cases,  
 18 during the time you were with RRA did you ever tell  
 19 them or direct them to go through Mr. Epstein's  
 20 trash?  
 21 MR. SCAROLA: Same objection, same  
 22 instruction.  
 23 BY MR. CRITTON:  
 24 Q. Did you ever direct the investigators to  
 25 go through the trash of the lawyers who were

1 BY MR. CRITTON:  
 2 Q. Since the time you have left RRA in your  
 3 current firm, have you conducted surveillance on Mr.  
 4 Epstein's property?  
 5 MR. SCAROLA: Same objection, same  
 6 instruction.  
 7 BY MR. CRITTON:  
 8 Q. Have you instructed anyone, either of the  
 9 in-house investigators to conduct surveillance of  
 10 Mr. Epstein's property?  
 11 MR. SCAROLA: Same objection, same  
 12 instruction.  
 13 BY MR. CRITTON:  
 14 Q. Have you authorized investigators employed  
 15 by RRA, either employees of the firm or an outside  
 16 investigation firm, to walk around the perimeter of  
 17 Mr. Epstein's home on or about March 17th of 2010?  
 18 MR. SCAROLA: Same objection, same  
 19 instruction.  
 20 THE WITNESS: What's the date?  
 21 MR. CRITTON: March 17th 2010.  
 22 MR. SCAROLA: St. Patrick's Day. Did you  
 23 employ any leprechauns?  
 24 THE WITNESS: Actually --  
 25

1 BY MR. CRITTON:

2 Q. With regard to the, with regard to the  
3 investigators, with regard to the investigation  
4 bills that would come in from outside investigators,  
5 specifically the one that you -- well, let me strike  
6 that.

7 The investigator that you hired before you  
8 went to RRA, I think you testified that bill was  
9 paid by RRA, correct?

10 A. Yes.

11 Q. All right. And in terms of the  
12 investigators who were employed by RRA for whatever  
13 investigation you directed them to do, those  
14 individuals were also paid from funds from RRA,  
15 correct?

16 A. During the time period when I was at RRA  
17 you're asking about specifically, correct?

18 Q. Correct.

19 A. Then the answer is, yes.

20 Q. Was there any specific cost account that  
21 was set up for Mr. Epstein's cases?

22 A. I don't know.

23 Q. Did you ever speak with the --

24 A. Again we're talking about the time period at  
25 RRA?

1 Q. At RRA

2 A. Okay.

3 Q. During the time you were at RRA did you  
4 ever speak with the accounting department or the  
5 accounting department ever call you to talk about  
6 the amount of costs, assuming they were something  
7 between 300 and \$500,000 that were being expended on  
8 Mr. Epstein files?

9 A. No.

10 Q. Did, did anyone at the firm ever call you  
11 to discuss the issue of the amount of costs between  
12 300 and \$500,000 that were being incurred to  
13 prosecute Mr. Epstein's cases?

14 A. No.

15 Q. Okay. Who had checked -- did you have any  
16 check-signing authority at RRA?

17 A. No.

18 Q. Who did sign the checks?

19 A. I don't know. I was --

20 Q. In terms of the, the work that was being  
21 done or the, the work that was, that is the costs  
22 that were being incurred including reimbursable  
23 costs, did you understand that you had a, basically  
24 an unlimited budget to prosecute those cases?

25 A. No.

1 Q. Okay. Well, if you could authorize any  
2 expenditure that you wanted and nobody ever told you  
3 not to, that you couldn't spend the particular  
4 money, what controls, if any, existed with regard to  
5 monies spent on the Epstein cases?

6 A. The presupposition that you just created is  
7 incorrect, so I cannot answer that question. You began  
8 with I have no limit to how I can spend money and that  
9 there is no regulation. I mean, that's just not true,  
10 so I don't understand what to tell you.

11 Q. What limits if any did you have in  
12 spending money in prosecuting Mr. Epstein's case?

13 A. We went through expediting transcripts and I  
14 used my own judgment.

15 Q. I understand that.

16 A. If we have another specific example, I will  
17 address it and I will tell you whether I had that  
18 authority or somebody else may have had that authority.  
19 But specifically related to expediting transcripts and  
20 things involving depositions, ordering depositions, I  
21 used my judgment and it was never questioned.

22 Q. Separate and apart from transcripts, if,  
23 if -- you've testified that the expenditures for  
24 costs that the firm or the trustee is seeking back,  
25 at RRA is seeking back, is seeking relating to any

1 recovery in any Epstein cases is between three and  
2 \$500,000, correct?

3 A. Correct.

4 Q. All right. So, separate and apart from  
5 expedited transcripts or video depositions or  
6 serving subpoenas, that, there has to be, you know,  
7 hundreds of thousands of dollars in additional  
8 expenses that were associated with prosecuting  
9 Mr. Epstein's cases, correct?

10 A. Correct.

11 Q. And with regard to those types of  
12 expenditures that are in the hundreds of thousands  
13 of dollars, who authorized those types of  
14 expenditures?

15 A. I don't know.

16 Q. Well, you said that you used judgment  
17 certainly with regard to transcripts. So, who, if,  
18 if spending an extra two, three, \$400,000 separate  
19 and apart from transcripts, serving subpoenas is not  
20 a limitless budget, how would you describe it; that  
21 is, what controls if any did you have in prosecuting  
22 the Epstein cases?

23 A. First, I haven't seen the delineation of that  
24 amount and I don't know that we agree with Rothstein  
25 Rosenfeldt Adler as to their costs, but that is what

1 they're claiming. I never juxtaposed that with what I  
 2 believe should be the proper amount. But beginning with  
 3 the fact that I do recognize that as the amount that  
 4 they are claiming, I was not aware that the costs were  
 5 that high.

6 The cases were firm cases, paid for by the  
 7 firm. I was simply an employee and I made judgment  
 8 calls. If somebody had told me at any given time,  
 9 we shouldn't serve these subpoenas, or we shouldn't  
 10 take this deposition, I wouldn't have done it.

11 Q. In fact, with regard to -- well, let me  
 12 ask you this: Were any informants, did you  
 13 authorize your investigators to hire informant,  
 14 informants?

15 MR. SCAROLA: Same objection, same  
 16 instruction.

17 BY MR. CRITTON:

18 Q. Did you authorize your investigators to do  
 19 electronic eves dropping?

20 MR. SCAROLA: Same objection, same  
 21 instruction.

22 BY MR. CRITTON:

23 Q. You indicated that you were just an  
 24 employee, correct?

25 A. Yes.

1 Q. Okay. In fact, you, on various documents  
 2 reflected that you were a partner of the firm,  
 3 correct?

4 A. Yes, document, documents do reflect that  
 5 title, of course, yeah.

6 Q. And if I had asked for a card during the  
 7 time that you started at RRA up until the time of  
 8 the implosion of the firm in late October of '09,  
 9 would your card have also reflected that you were a  
 10 partner of the firm?

11 A. I think you did request a card. I think I  
 12 gave it to you and I believe that it did say partner on  
 13 it.

14 Q. And you would agree that at least up until  
 15 the time of the implosion of RRA you held yourself  
 16 out to the public, and including other lawyers, as  
 17 being a partner of RRA, true?

18 A. What do you mean by held myself out to the  
 19 public?

20 Q. You called yourself a partner. You didn't  
 21 say I'm an employee; I'm not a partner, correct?  
 22 You held yourself out to the public as being a  
 23 partner?

24 MR. SCAROLA: I'm going to object to the  
 25 form of the question to the extent that it

1 suggests that those terms are mutually  
 2 exclusive.

3 THE WITNESS: That was a part of my answer  
 4 is that, I don't know --

5 MR. CRITTON: I am shocked to hear that.

6 THE WITNESS: I don't know that being an  
 7 employee means that you can't also be a  
 8 partner. There are equity partners and  
 9 non-equity partners to nearly every single  
 10 large firm, so I was a non-equity partner  
 11 otherwise known as a salaried employee. That's  
 12 just the way it was.

13 BY MR. CRITTON:

14 Q. But your card just reflected partner as  
 15 did your --

16 A. Rather than that whole script I just told you.

17 Q. Right. Rather than the qualifying  
 18 provisions.

19 A. Yes, you're right. The qualifying positions  
 20 didn't make the card.

21 Q. With regard to the monies that was, that  
 22 were being paid by, by Rothstein, I'm sorry, by the  
 23 RRA firm for the costs -- let me strike that.

24 During the time that you were at the RRA firm, the  
 25 seven months that you were there from April through

1 the end of October, do you recall any significant  
 2 settlements that were coming into the firm; that is,  
 3 that were publicized?

4 A. Do I recall significant settlements --

5 Q. Correct.

6 A. -- coming into the firm that were publicized?

7 Q. Correct?

8 A. I believe, I can't say with any degree of  
 9 specificity whether I remember anything that falls into  
 10 all of those categories.

11 Q. Now, I forgot my question for a minute.  
 12 If I understand your answer, and assuming I remember  
 13 my question, Mr. Edwards, you don't recall any  
 14 significant settlements coming into the firm that  
 15 were, that were publicized either internally within  
 16 the firm or within the newspapers; is that a fair  
 17 statement?

18 A. Fair statement.

19 Q. Where did you think all of the money that  
 20 was coming from -- let me strike that. At that time  
 21 how many lawyers were there in the Fort Lauderdale  
 22 office; that is, during the time you were there?

23 A. I don't know.

24 Q. Best estimate?

25 A. Seventy.

1 Q. Okay. And the support, how many floors  
 2 did RRA occupy in the Fort Lauderdale --  
 3 A. I believe six.  
 4 Q. And approximately how many square feet on  
 5 each floor?  
 6 A. I don't know. A lot.  
 7 Q. More than 10,000 square feet on each  
 8 floor?  
 9 A. I don't know.  
 10 Q. And what was the support staff at the time  
 11 that you were there approximately?  
 12 A. In quantity or quality?  
 13 Q. Quantity, the number of people.  
 14 A. I don't know. A lot of people.  
 15 Q. Did you do any hourly billing yourself at  
 16 all or were you strictly a contingency fee person?  
 17 A. 90 percent contingency.  
 18 Q. And with regard to the monies that were --  
 19 separate and apart from the Epstein, Epstein cases  
 20 where at least you now know that they cost between  
 21 three and \$500,000, you were, I assume, incurring  
 22 other expenses on other cases, true?  
 23 A. True.  
 24 Q. All right. And where did you, where did  
 25 you think that the money was coming from; that is,

1 BY MR. CRITTON:  
 2 Q. Where did you think the law firm -- let me  
 3 strike that. Did you ever discuss with anyone  
 4 whether it was from current cash that was being used  
 5 or whether they had a line of credit or both?  
 6 A. Didn't know.  
 7 Q. Mr. Edwards, did you come to learn that  
 8 investigators had, that investigators had gone to  
 9 Mr. Epstein's property on March 17th, 2010?  
 10 A. No.  
 11 Q. Did you ever authorize any investigators  
 12 to enter Mr. property (sic), Mr. Epstein's property  
 13 on March 17th, 2010?  
 14 MR. SCAROLA: Objection. Instruct you not  
 15 to answer on the basis of work-product  
 16 privilege.  
 17 BY MR. CRITTON:  
 18 Q. Let me just be clear. Are, are you aware  
 19 of any investigators who entered Mr. Epstein's  
 20 property on March 17th, 2010?  
 21 MR. SCAROLA: Same objection as well as  
 22 attorney-client privilege and instruct you not  
 23 to answer.  
 24 BY MR. CRITTON:  
 25 Q. Mr. Edwards, did you authorize any

1 the source of the money to pay the extensive bills  
 2 that were being incurred on Epstein and other cases?  
 3 MR. SCAROLA: I am going to object to the  
 4 extent the question calls -- excuse me, I'm  
 5 going to object because there is no proper  
 6 predicate to the question, and that is that it  
 7 was a matter that was ever given a thought by  
 8 Mr. Edwards.  
 9 MR. CRITTON: Is that form? Form is  
 10 adequate so you don't have to instruct him.  
 11 MR. SCAROLA: Thank you.  
 12 THE WITNESS: What's the question?  
 13 BY MR. CRITTON:  
 14 Q. What did you consider, what did you  
 15 believe was the cost; that is, the source of the  
 16 money that was used to be paying these extensive  
 17 costs that were being incurred in Epstein and other  
 18 cases?  
 19 MR. SCAROLA: Objection.  
 20 MR. CRITTON: Just of yours and yours  
 21 alone?  
 22 MR. SCAROLA: Objection, form and  
 23 compound.  
 24 THE WITNESS: The law firm.  
 25

1 investigators to trespass on Mr. Epstein's property  
 2 on March 17th of 2010?  
 3 MR. SCAROLA: Same objection and  
 4 instruction.  
 5 BY MR. CRITTON:  
 6 Q. Mr. Edwards, did you authorize  
 7 investigators to hide in the bushes at Mr. Epstein's  
 8 house in order to take photographs of either  
 9 Mr. Epstein or any associated objects on his  
 10 property?  
 11 MR. SCAROLA: Same objection and  
 12 instruction.  
 13 BY MR. CRITTON:  
 14 Q. Mr. Epstein -- Mr. Epstein. Mr. Edwards,  
 15 do you know a lady name Christina Kitterman?  
 16 A. Yes.  
 17 Q. Okay. And who -- how do you know her?  
 18 A. She was a lawyer at Rothstein Rosenfeldt Adler  
 19 when I was a lawyer at Rothstein Rosenfeldt Adler.  
 20 Q. Did you have any dealings with her on any  
 21 of your cases?  
 22 A. None.  
 23 Q. What did you understand her area of  
 24 practice?  
 25 A. Never knew.

1 Q. Did you know an individual by the name of  
 2 Patrick Roberts?

3 A. Yes.

4 Q. Okay. And who is Mr. Roberts during; that  
 5 is, what did Mr. Roberts do for RRA?

6 A. He was an investigator.

7 Q. Did he ever perform investigation work on  
 8 any of the Epstein files?

9 MR. SCAROLA: Same objection, same  
 10 instruction.

11 BY MR. CRITTON:

12 Q. Did you ever authorize Mr. Roberts to  
 13 perform investigation on the Epstein files?

14 MR. SCAROLA: Same objection and  
 15 instruction.

16 BY MR. CRITTON:

17 Q. All right. I asked you earlier about  
 18 Richard Fandrey, F-a-n-d-r-e-y. I think you said  
 19 you don't know who that -- you knew someone named  
 20 Rick; is that correct?

21 A. I know an investigator named Rick.

22 Q. Did Rick, did Rick perform any  
 23 investigation on the Epstein, did you authorize Rick  
 24 to perform any investigation on the Epstein files?

25 MR. SCAROLA: Same objection and

1 instruction.

2 MR. CRITTON: Says he doesn't know them.  
 3 How can that be an instruction?

4 MR. SCAROLA: Well, because I am not going  
 5 to tell you, we're not going to permit  
 6 Mr. Edwards to answer any questions about  
 7 either what he did or what he didn't do that  
 8 are part of the work product involved in his  
 9 representation of the Plaintiffs with claims  
 10 against Mr. Epstein whom Mr. Edwards is  
 11 representing.

12 MR. CRITTON: Did you ever --

13 MR. SCAROLA: So, in light of that and  
 14 what I have attempted to make very clear with  
 15 regard to the scope of our objections, if you  
 16 continue to ask questions which it is clear  
 17 fall within the scope of my instructions to  
 18 Mr. Edwards and my announced intention with  
 19 regard to the scope of those instructions, then  
 20 we will terminate this deposition so that I can  
 21 seek a protective order.

22 My suggestion is that you move onto other  
 23 areas that are outside the scope of that  
 24 instruction, if you have any other questions  
 25 outside the scope.

1 instruction.

2 BY MR. CRITTON:

3 Q. And I believe we talked a little bit  
 4 about, we certainly talked about Mr. Jenne, did you  
 5 ever authorize or direct Mr. Jenne to perform any  
 6 investigation on the Epstein files?

7 MR. SCAROLA: Same objection and  
 8 instruction.

9 BY MR. CRITTON:

10 Q. Are you familiar with the company called  
 11 Blue Line Research and Development?

12 A. No.

13 Q. Are you, are you aware at the current time  
 14 that there is an entity called Blue Line Research  
 15 and Development which is composed of Mr. Roberts,  
 16 Mr. Richard Fandrey, Mr. Michael Fisten and Ken  
 17 Jenne?

18 A. No.

19 Q. If you're unaware of the existence of the  
 20 entity called Blue Line Research and Development,  
 21 LLC, would it be a correct statement that you have  
 22 never authorized anyone from Blue Line Research and  
 23 Development, LLC, to conduct any investigation of  
 24 Jeffrey Epstein?

25 MR. SCAROLA: Same objection, same

1 MR. CRITTON: Oh, I have a lot of other  
 2 questions.

3 MR. SCAROLA: Okay.

4 MR. CRITTON: Let me be clear with you  
 5 with regard to any, for purposes of following,  
 6 asking any follow-up questions should the court  
 7 determine that I am entitled to this  
 8 information, you would agree that should the  
 9 court determine I am entitled to ask the name  
 10 of these individuals and possibly other  
 11 questions is, is that by not asking questions I  
 12 am in no way waiving my right to ask as many  
 13 questions as the court ultimately determines as  
 14 appropriate, proper, and as the court allows,  
 15 correct?

16 MR. SCAROLA: I absolutely agree.

17 MR. CRITTON: All right.

18 BY MR. CRITTON:

19 Q. Mr. Edwards, are you familiar with a  
 20 person named Alfredo Rodriguez?

21 A. Yes.

22 Q. And how do you know Mr. Rodriguez?

23 A. Who do I know him to be? How do I know him?  
 24 I met him the same -- well, I met him after you did,  
 25 after you and your investigators pre-depoed him on three

1 various occasions for a total of about 15 hours before  
 2 we took this deposition. I met him for the first time  
 3 during that deposition.

4 MR. CRITTON: Let me move to strike as  
 5 nonresponsive.

6 BY MR. CRITTON:

7 Q. My question to you is when did you first  
 8 meet Mr. Rodriguez?

9 MR. SCAROLA: And you have an answer to  
 10 that question.

11 THE WITNESS: It's a very complete answer.  
 12 I, the day of his deposition.

13 BY MR. CRITTON:

14 Q. Had you ever spoken with Mr. Rodriguez  
 15 before that time?

16 A. No.

17 Q. Okay. Had anyone on your behalf spoken  
 18 with Mr. Rodriguez?

19 A. No.

20 Q. Mr. Rodriguez's deposition occurred over a  
 21 two-day period; is that correct? Two separate days.

22 A. I believe that's right.

23 Q. And you were present for both of those  
 24 depositions; is that correct?

25 A. Yes.

1 July 29th and August 7th?

2 A. And if I did or if I didn't, either way that's  
 3 going to be protected by the work-product privilege and  
 4 I'm not going to give you that information because  
 5 you're not entitled to it.

6 Q. I disagree even in a simple  
 7 attorney-client privilege you also, you identify the  
 8 date, you don't identify the subject, but you  
 9 identify the date, who may have been present.

10 MR. SCAROLA: We understand your position  
 11 and it's not necessary to articulate it on the  
 12 record.

13 MR. CRITTON: I just want to be clear.  
 14 And your position is the same is you're not  
 15 talking.

16 MR. SCAROLA: Work-product.

17 MR. CRITTON: Work-product, correct?

18 MR. SCAROLA: That's correct.

19 BY MR. CRITTON:

20 Q. Mr. Rodriguez was requested to bring  
 21 documents to his second deposition that he had  
 22 referenced that he might have. Do you recall that  
 23 from the first deposition, Mr. Edwards?

24 A. I do.

25 Q. And in fact when he came to the second

1 Q. And the first one I believe at least in  
 2 looking at the transcript the first one occurred on  
 3 January 29th of '09?

4 A. I'm assuming.

5 Q. And the second, the follow-up was on  
 6 August 7th, 2009, correct?

7 A. When was the first, January you said?

8 Q. Excuse me. I'm sorry. July 29th, 2009.

9 A. Okay.

10 Q. With the follow-up July, I'm sorry  
 11 August 7th, 2009.

12 A. If you say so. I'm not quarreling with that.

13 Q. And I will just represent that is what I  
 14 read off the transcripts. Between those two dates,  
 15 that is July 29th and August 7th of '09, did you  
 16 speak with Mr. Rodriguez at all?

17 MR. SCAROLA: Same objection, same  
 18 instruction to the extent that any such  
 19 conversation may have occurred in connection  
 20 with your representation of the Plaintiffs and  
 21 claims against Mr. Epstein.

22 BY MR. CRITTON:

23 Q. All I am asking right now, not the  
 24 substance but just so the record is clear I am just  
 25 asking, did you speak with Mr. Rodriguez between

1 deposition, he didn't bring any documents with him,  
 2 did he?

3 A. I don't remember.

4 Q. Well, do you remember him producing any  
 5 documents at the second, at his completion of his  
 6 deposition?

7 A. I don't remember.

8 Q. Do you recall him saying that he might  
 9 have some sort of book or some sort of list of names  
 10 and addresses and/or names, excuse me, of females  
 11 who may have come to Mr. Epstein's house along with  
 12 phone numbers?

13 A. I don't remember if he said that or it says  
 14 that in the police report, but I remember that  
 15 information at some point in time.

16 Q. All right. And subsequent, at the  
 17 conclusion -- well, let me strike that.

18 Do you recall receiving any documents from  
 19 Mr. Rodriguez that were produced at his deposition  
 20 that had the names and addresses and/or phone  
 21 numbers of any other females?

22 A. I don't know. Do you? We were there together  
 23 I don't remember specifically. I think the answer is  
 24 no.

25 Q. And I think you're right.

1 A. Okay.  
 2 Q. We agree on that.  
 3 A. Okay.  
 4 Q. Subsequent to the deposition; that is,  
 5 after Mr. Rodriguez's deposition, did Mr. Rodriguez  
 6 contact you?  
 7 MR. SCAROLA: Objection, instruct you not  
 8 to answer.  
 9 MR. CRITTON: Well, this is -- okay. This  
 10 is a third party contacting Mr. Edwards. All  
 11 right.  
 12 MR. SCAROLA: It is not --  
 13 MR. CRITTON: It's just a yes or no I'm  
 14 looking for.  
 15 MR. SCAROLA: It is a witness in these  
 16 proceedings.  
 17 MR. CRITTON: So.  
 18 MR. SCAROLA: So, anything that  
 19 Mr. Edwards has done or may have done in  
 20 connection with his investigation and  
 21 prosecution of the claims against Mr. Rothstein  
 22 it is our position is not the appropriate  
 23 subject matter of inquiry in the context of  
 24 this lawsuit, and is an attempt to invade the  
 25 attorney-client and work-product privileges. I

1 am instructing him not to answer.  
 2 If the court, if the court determines that  
 3 the scope of the privilege permits a response  
 4 to these questions, we would be happy to  
 5 respond to them.  
 6 But we have an obligation to, to  
 7 Mr. Edward's clients to protect their rights to  
 8 a fair trial and their rights to  
 9 confidentiality, and for that reason we are  
 10 obliged to interpret those privileges in their  
 11 broadest sense unless and until the court  
 12 decides that a more restrictive interpretation  
 13 should be applied.  
 14 BY MR. CRITTON:  
 15 Q. Between the first and second deposition of  
 16 Mr. Rodriguez, I think you, I think you indicated  
 17 that you did not speak with him; is that correct?  
 18 A. You're asking me if I indicated to you  
 19 previously during this deposition whether --  
 20 Q. Right.  
 21 A. -- I spoke to him or not? I, I don't  
 22 remember.  
 23 Q. Did you speak with Mr. Rodriguez between  
 24 his first and second.  
 25 MR. SCAROLA: Same objection, same

1 instruction.  
 2 BY MR. CRITTON:  
 3 Q. Did Mr. Mr. Rodriguez ever make a request  
 4 of you at any time for any type of monies for  
 5 testimony, documents, or any other information  
 6 associated with any existing or potential claimants  
 7 directed to Mr. Epstein?  
 8 MR. SCAROLA: Same objection and  
 9 instruction.  
 10 BY MR. CRITTON:  
 11 Q. Subsequent, after Mr. Rodriguez or from  
 12 the time that Mr. Rodriguez completed his deposition  
 13 on August 7th of 2009, did you have an occasion to  
 14 speak with either the FBI, well, with the FBI  
 15 regarding Alfredo Rodriguez?  
 16 MR. SCAROLA: Same objection and  
 17 instruction.  
 18 BY MR. CRITTON:  
 19 Q. Did you after Mr. Rodriguez's completion  
 20 of his deposition on August 7th, 2009, did you have  
 21 an occasion to speak with any representative, a  
 22 professional attorney, professional slash attorney  
 23 for the U.S. Attorney's Office?  
 24 MR. SCAROLA: Same objection and  
 25 instruction.

1 BY MR. CRITTON:  
 2 Q. Mr. Edwards, are you familiar with the,  
 3 the criminal complaint that was filed relating to  
 4 Alfredo Rodriguez?  
 5 MR. CRITTON: Let me show you what I will  
 6 mark as Exhibit 1 to the deposition.  
 7 (Plaintiff's Exhibit No. 1 was marked for  
 8 identification.)  
 9 MR. SCAROLA: By that question, does that  
 10 mean has he seen it before?  
 11 MR. CRITTON: First, let me show you  
 12 Exhibit 1. Do you -- it's a criminal  
 13 complaint, the United States of America versus  
 14 Alfredo Rodriguez.  
 15 MR. SCAROLA: Is your question has he seen  
 16 it before?  
 17 MR. CRITTON: Yes.  
 18 MR. SCAROLA: I'm not sure what "are you  
 19 familiar with it" means.  
 20 BY MR. CRITTON:  
 21 Q. Have you seen this criminal complaint  
 22 before today?  
 23 A. Yes.  
 24 Q. When did you first see this document?  
 25 A. I -- I don't know.

1 Q. Did you, did you see Exhibit 1, the  
 2 criminal complaint, prior to the time that it was  
 3 filed in the United States District Court?  
 4 A. Did I see it prior to it being filed?  
 5 Q. Yes, sir.  
 6 A. No, no.  
 7 Q. Okay. Did you provide an affidavit to any  
 8 individual at the FBI or the U.S. Attorney's Office  
 9 in support of, although not attached to this, to  
 10 Exhibit 1, the criminal complaint?  
 11 A. Repeat.  
 12 Q. Did you sign any affidavit or give, give  
 13 any sworn testimony associated with the criminal  
 14 complaint that was filed by the United States of  
 15 America versus Mr. Rodriguez?  
 16 A. It's obvious to me that you're trying to  
 17 circumvent the privileges that have been placed on the  
 18 record. I will answer that question that, no, I did  
 19 not, but I am not here to divulge anything that may  
 20 waive my attorney-client or work-product privilege or  
 21 otherwise jeopardize the claims that my three clients  
 22 are pursuing against Jeffrey Epstein for their being  
 23 sexually molested by him when they were underage minor  
 24 females.  
 25 Q. Mr. Edwards, are you the cooperating

1 witness who was referenced in the criminal  
 2 complaint, Exhibit 1?  
 3 MR. SCAROLA: Could you explain to us for  
 4 the record, please, how that line of inquiry is  
 5 reasonably calculated to lead to admissible  
 6 evidence in this case?  
 7 MR. CRITTON: I am not prepared to do that  
 8 right now.  
 9 MR. SCAROLA: Then I am not prepared to  
 10 allow Mr. Edwards to answer that question  
 11 outside the presence of an Assistant United  
 12 States Attorney who can make a judgment as to  
 13 whether that is information that ought to be  
 14 disclosed.  
 15 BY MR. CRITTON:  
 16 Q. Mr. Edwards, you knew or you first Marie  
 17 Villafana through the complaint you filed on behalf  
 18 of Jane Doe 1 and Jane Doe 2 in July of 2008,  
 19 correct?  
 20 A. No.  
 21 Q. Had you spoken with her before that period  
 22 of time; that is, before the complaint was ever  
 23 filed?  
 24 A. Yes.  
 25 Q. And I am now – did you know Ms. Villafana

1 during your years that you had worked as a State  
 2 Attorney?  
 3 A. No.

4 Q. Okay. Did you meet her only as a result  
 5 of Epstein related matters?  
 6 A. Yes, in its broadest sense I suppose.

7 Q. Did you, did you have, before you began  
 8 representing E.W., did you know who Marie Villafana  
 9 was?  
 10 A. I don't know.

11 Q. What, what was your first association or  
 12 what contact was, what was your first contact with  
 13 Marie Villafana ever?  
 14 A. I don't remember.

15 Q. But if I understand correctly you only  
 16 know her through the context of the Jeffrey Epstein  
 17 matter; is that correct?  
 18 A. Her involvement with, yes.

19 Q. And that you only knew of her involvement  
 20 in the Jeffrey Epstein matter after you began  
 21 representing E.W.?  
 22 A. I don't believe that to be accurate.

23 Q. What involvement could you possibly, what  
 24 involvement would you have had with Mrs. Villafana  
 25 before you became involved in representing someone

1 associated with the Epstein matter?

2 A. I believe that I had read her name in the  
 3 newspaper related to some involvement with Jeffrey  
 4 Epstein's criminal investigation and/or case. I think  
 5 that's the first time I saw her name, I believe.

6 Q. Before, before you filed a lawsuit against  
 7 the United States of America, and I may have asked  
 8 you this earlier, so I apologize, did you ever speak  
 9 with Mrs. Villafana?

10 A. I believe that any communications that I would  
 11 have had with respect to Mrs. Villafana would have only  
 12 been in the interest of pursuing claims on behalf of the  
 13 clients that I represented. And therefore I am going to  
 14 claim a work-product privilege as to those  
 15 communications.

16 Q. Okay. My, my question was is only did you  
 17 speak with her prior to filing that complaint? Just  
 18 a yes or a no, and I am looking, that question is  
 19 not asking for the substance. I am just asking for  
 20 a yes or no.

21 MR. SCAROLA: Same objection, same  
 22 instruction.

23 BY MR. CRITTON:

24 Q. During the course of the litigation with  
 25 the United States Attorney's Office, I assume you

1 had conversations with Mrs. Villafana from time to  
 2 time?

3 A. Okay.

4 Q. Is that true?

5 A. Is your assumption true?

6 Q. Correct.

7 A. I have spoken with Ms. Villafana.

8 Q. And when you spoke with Ms. Villafana --  
 9 let me strike that. Have the only conversations  
 10 that you have had with Mr. Marie Villafana or  
 11 Villafana, have they only been in the context of  
 12 Jane Doe 1 and 2 versus United States of America,  
 13 only in the context of that case?

14 MR. SCAROLA: Same objection.

15 MR. CRITTON: And I will separate out to  
 16 the extent that you were at the June 12th,  
 17 2009, hearing in front of Judge Marra where she  
 18 was present.

19 MR. SCAROLA: Same objection, same  
 20 instruction.

21 BY MR. CRITTON:

22 Q. Has Ms.-- have you spoken, have you had an  
 23 occasion to speak with Ms. Villafana with regard to  
 24 the criminal complaint, Exhibit No. 1, involving  
 25 Alfredo Rodriguez, Mr. Rodriguez?

1 BY MR. CRITTON:

2 Q. Did you speak with Agent Nesbitt at that  
 3 time?

4 A. Yes.

5 Q. Okay. And what did, what did, did she  
 6 initiate the conversation or did you?

7 A. The court initiated the conversation.

8 Q. Did the court say go outside and talk?

9 A. Right.

10 Q. The court being Judge Marra?

11 A. Correct.

12 Q. And who else was present for that  
 13 conversation?

14 A. I don't remember. Marie Villafana.

15 Q. Okay. What was the discussion about that  
 16 the court ordered?

17 A. The failure of the U.S. Attorney's Office to  
 18 meaningfully confer with the numerous victims of Jeffrey  
 19 Epstein's sexual abuse prior to negotiating a plea in  
 20 his criminal matter.

21 Q. How long did the conversation last?

22 A. Less than ten minutes.

23 Q. Was Agent Jason Richards there as well?

24 A. There was a male agent there. I don't know  
 25 his name, but there was another FBI agent.

1 MR. SCAROLA: Same objection, same  
 2 instruction.

3 BY MR. CRITTON:

4 Q. Mr. Edwards, have you ever been  
 5 interviewed by the FBI or the U.S. Attorney's office  
 6 with regard to any of your clients?

7 MR. SCAROLA: Any of the three clients who  
 8 have claims against Mr. Epstein?

9 MR. CRITTON: Correct.

10 MR. SCAROLA: Same objection, same  
 11 instruction.

12 BY MR. CRITTON:

13 Q. Do you know Agent Nesbitt, sir?

14 A. Yes.

15 Q. And how do you know Agent Nesbitt from the  
 16 FBI?

17 A. I can answer if you want.

18 MR. SCAROLA: Okay. That's fine.

19 MR. CRITTON: Nesbitt Kirkendahl.

20 THE WITNESS: I don't know her last name  
 21 but I do know the first name is, the first name  
 22 is obviously an unusual name, so I do know who  
 23 that is. I met her outside of the courtroom  
 24 related to the Jane Doe 1 and 2 versus United  
 25 States of America case.

1 Q. Did Agent Nesbitt Kirkendahl, did she say  
 2 anything? Did she participate in the conversation?

3 A. No.

4 Q. Okay. Was it just Mrs. Villafana?

5 A. There was another U.S. Attorney there.

6 Q. A U.S.A.O. there?

7 A. Yes.

8 Q. Do you remember a he or a she?

9 A. He.

10 Q. Do you remember his name?

11 A. Lee.

12 Q. Lee?

13 A. I think that's his last name. Dexter Lee.

14 Q. Did Mr. -- did Dexter Lee, is he the one  
 15 who conducted the conversation with you?

16 A. Yes.

17 Q. What was his response to your statement?

18 A. That this conversation is more complicated  
 19 than the time constraints that we have right now will  
 20 allow. We are not going to come to a resolution at this  
 21 point on any issues that you or your clients believe are  
 22 pertinent to the case you filed.

23 Q. That was the end of the conversation?

24 A. I mean, I am not quoting verbatim, but, yes  
 25 that was the summary.

1 Q. And did you go back in front of Judge  
 2 Marra that same day?

3 A. I can't remember.

4 Q. Did he issue an order based upon that  
 5 hearing?

6 A. The, the record in the case will speak for  
 7 itself. I really, I don't remember right now.

8 Q. Have you had any other conversations with  
 9 Nesbitt Kirkendahl other than? Well, I mean any  
 10 other face-to-face conversations with her other than  
 11 that one day back in July of, July or August of  
 12 2008?

13 A. No.

14 Q. Have you seen Nesbitt, Agent Nesbitt  
 15 Kirkendahl since July, July or August of 2008 during  
 16 that short conference as physically seen her  
 17 someplace?

18 A. Unless she was at the hearing we all attended  
 19 on your motion to stay that day when there were a lot of  
 20 people in the courtroom, the answer is no.

21 Q. Okay. Have you seen Agent Jason, assuming  
 22 the male agent's name was Jason Richards or Richard,  
 23 have you seen him since that day in July or August  
 24 of 2008?

25 A. I do not believe I have.

1 Rothstein.

2 Q. So, it would be a correct, and I am going  
 3 to expand it, would it be a correct statement that  
 4 no representative of the federal government and by  
 5 that I mean the Department of Justice, FBI, any  
 6 other law enforcement agency nor any state  
 7 governmental agency has ever asked you or quizzed  
 8 you or questioned you about your association with  
 9 Rothstein, Rosenfeldt, and Adler during the seven,  
 10 approximately seven months you were there; is that  
 11 correct?

12 A. That's correct.

13 Q. Mr. Edwards, has, has anyone from the  
 14 United States Attorney's Office discussed the  
 15 topic -- well, let me strike that. Have you been  
 16 granted immunity with regard to any aspect of your  
 17 work associated with either the Epstein files or the  
 18 Rothstein prosecution?

19 A. I don't understand your question.

20 Q. Okay. You're aware that Mr. --

21 A. I can answer, no. I haven't been granted  
 22 immunity to anything, so it doesn't matter what your  
 23 question is.

24 Q. Okay. Have you ever had any conversations  
 25 with any of the probation officers in Palm Beach

1 Q. Have you spoken with either Nesbitt  
 2 Kirkendahl or Jason Richard relating to any Epstein  
 3 related matter since July or August of 2008?

4 MR. SCAROLA: I am going to instruct you  
 5 not to answer on the basis of the privilege as  
 6 previously described.

7 BY MR. CRITTON:

8 Q. Mr. Edwards, have you spoken with any rep,  
 9 has any representative of the FBI attempted to speak  
 10 with you regarding your association with the RRA  
 11 firm?

12 A. No.

13 Q. Has any member of the U.S. Attorney's  
 14 Office discussed with you any aspect of your tenure  
 15 or employment at the RRA firm?

16 A. No.

17 Q. In any conversations that you, that you  
 18 had that you've had with the United States  
 19 Attorney's Office at any time, has anyone ever asked  
 20 you any questions about Scott Rothstein?

21 A. You're presupposing that I had conversations,  
 22 but I will answer the question whether I have or have  
 23 not had conversations. Nobody has asked me any  
 24 questions from the State Attorney's Office, U.S.  
 25 Attorney Office, FBI, or other agency related to Scott

1 County regarding Mr. Epstein?

2 A. No.

3 Q. Have you directed that anyone have any  
 4 discussions with the probation officers in Palm  
 5 Beach County regarding Mr. Epstein?

6 A. That is clearly calling for work-product  
 7 privilege information. I'm not going to answer the  
 8 question.

9 Q. Have you had any discussion with any of  
 10 the other lawyers who represent clients in the  
 11 Epstein, in Epstein related matters regarding  
 12 Mr. Epstein's probation?

13 MR. SCAROLA: Same objection, same  
 14 instructions, and I would add to those  
 15 objections the objection based upon a joint  
 16 prosecution interest.

17 BY MR. CRITTON:

18 Q. Mr. Edwards, among the Plaintiffs'  
 19 lawyers, is there any type of joint prosecution  
 20 agreement related to Mr. Epstein?

21 MR. SCAROLA: Same objection, same  
 22 instruction.

23 BY MR. CRITTON:

24 Q. Did you have -- did you engage in weekly  
 25 or monthly meetings among the Plaintiffs' lawyer to

1 share investigative material regarding, that you had  
 2 obtained regarding Mr. Epstein?

3 MR. SCAROLA: Same objections and  
 4 instructions.

5 BY MR. CRITTON:

6 Q. Did you provide any of the investigative  
 7 materials that had been acquired by you to any other  
 8 person outside of the RRA firm and the Farmer, Jaffe  
 9 firm up through the current date?

10 MR. SCAROLA: Would you read that question  
 11 back?

12 BY MR. CRITTON:

13 Q. Let me ask it. During the time that you  
 14 were with RRA, excuse me, and had investigation done  
 15 on Mr. Epstein, was any of your investigation that  
 16 you had performed turned over to any person outside  
 17 of RRA or your clients?

18 MR. SCAROLA: Same objection, same  
 19 instruction to the extent that that would  
 20 encompass other attorneys with a shared  
 21 interest in the prosecution of Mr. Epstein.

22 If any of those materials were turned over  
 23 to persons who did not have a direct interest  
 24 to lawyers who did not have a direct interest  
 25 in the prosecution of the claims against

1 instruction.

2 BY MR. CRITTON:

3 Q. Mr. Edwards, do any of the  
 4 investigators – let me strike that. Did any of the  
 5 investigators who worked for RRA refer any Epstein  
 6 client to you?

7 A. What is an Epstein client?

8 Q. I am sorry. Did any of the investigators  
 9 who worked for RRA refer a perspective claimant  
 10 against Mr. Epstein to you?

11 A. No.

12 Q. Did any of your, did any of the RRA  
 13 investigators ever meet with your three clients?

14 MR. SCAROLA: Same objection. Same  
 15 instruction.

16 MR. CRITTON: Okay. And I'm looking for  
 17 is a yes/no.

18 MR. SCAROLA: Correct. Same objection,  
 19 same instruction.

20 BY MR. CRITTON:

21 Q. Mr. Edwards, during the time that you were  
 22 with RRA, did you, your e-mail, was your only e-mail  
 23 address bedwards@rra-law.com?

24 A. I only had one e-mail address.

25 Q. All right. Did you ever receive any

1 Mr. Epstein or to clients who did not have, to  
 2 persons who did not have a direct interest in  
 3 the pursuit of their claims against  
 4 Mr. Epstein, then you can answer to that  
 5 extent.

6 THE WITNESS: Privileged.

7 BY MR. CRITTON:

8 Q. And I just want to be clear is, is there  
 9 any written agreement and I know you, I want to make  
 10 certain that the objection is there, is as we both  
 11 know there are a number of claims. There are a  
 12 number of claims that are outstanding against  
 13 Mr. Epstein brought by a number of different  
 14 lawyers.

15 MR. SCAROLA: The objection extends to  
 16 both written agreements and oral agreements.

17 THE WITNESS: Yes. We both know that  
 18 there are a lot of claims against Mr. Epstein  
 19 for basically the same conduct.

20 BY MR. CRITTON:

21 Q. And my question to you is is, is there any  
 22 written agreement between the Plaintiff lawyers who  
 23 have filed claims against Mr. Epstein regarding the  
 24 sharing of information?

25 MR. SCAROLA: Same objection, same

1 information regarding your cases at your home  
 2 e-mail?

3 A. I don't remember.

4 Q. Okay. What is your home e-mail address,  
 5 please.

6 THE WITNESS: Do I give this?

7 MR. SCAROLA: (Mr. Scarola nods his head.)

8 THE WITNESS: B-r-a-d-d-6-9@hotmail.com.

9 BY MR. CRITTON:

10 Q. Did you have a separate fax number at RRA  
 11 when you were there; that is, just so a fax would  
 12 come directly to either yours or an area where you  
 13 were located?

14 A. No.

15 Q. In any of the directions that you ever  
 16 gave to the investigators, did you ever put that in  
 17 the form of a memo; that is, would you give them  
 18 written directions?

19 MR. SCAROLA: Same objection, same  
 20 instruction.

21 BY MR. CRITTON:

22 Q. To your knowledge did any of the  
 23 investigations that were done regarding Mr. Epstein,  
 24 were they provided to any other person at RRA?

25 A. Excuse me?

1 Q. You have testified that investigations  
 2 were done during the time, on Mr., relating to  
 3 Mr. Epstein during the time that you were at RRA

4 A. Right.

5 Q. My question to you is, did you -- first of  
 6 all did you receive written reports in addition to  
 7 oral reports?

8 A. From the investigators?

9 Q. Yes, sir.

10 THE WITNESS: Answer?

11 MR. SCAROLA: Yeah.

12 THE WITNESS: The reports were -- yes, I  
 13 did.

14 BY MR. CRITTON:

15 Q. And were the reports provided by e-mail or  
 16 were they provided by, in the form of a memo that  
 17 would be sent from the investigator to you or both?

18 A. I, I do not remember there being any in the  
 19 form of an e-mail. Does not mean that there was not. I  
 20 did communicate by e-mail with other members of the firm  
 21 and other members of the investigative team on all cases  
 22 as has been my practice all along practicing law. There  
 23 were memos, though, that were given to me that were not  
 24 e-mail form that were the standard memos that I would  
 25 incorporate into a witness memo file.

1 and I'm using just as an example, is that he came in  
 2 or Scott Rothstein came in and looked at a  
 3 particular file of yours, whether it related to  
 4 Mr. Epstein or not, you don't know?

5 A. I can't answer that question accurately.

6 Q. Okay. Did you ever send investigative  
 7 reports to other lawyers regarding Mr. Epstein; that  
 8 is, if you got an investigative report from  
 9 Mr. Fisten or Mr. Jenne or whomever, would you send  
 10 those on to certain lawyers on a regular basis?

11 MR. SCAROLA: You can answer that  
 12 question.

13 THE WITNESS: No.

14 BY MR. CRITTON:

15 Q. What lawyers, other than yourself, were  
 16 involved in the Epstein cases during the time you  
 17 were associated with RRA?

18 A. What do you mean by "were involved?" I guess  
 19 all.

20 Q. What, what lawyers actually worked on the  
 21 file? I know Mr. Berger worked on the Epstein  
 22 cases, correct?

23 A. In some limited capacity, correct.

24 Q. Okay. Mr. Adler I know attended  
 25 Mr. Epstein's deposition, correct?

1 Q. And again that would just be in your,  
 2 would that be in your electronic storage as well as  
 3 in the hard copies?

4 A. The version I saw was the electronic.

5 Q. So, that would be stored in the Fortis  
 6 program?

7 A. That's correct.

8 Q. All right. And again other individuals in  
 9 the firm, other lawyers in the firm might be able to  
 10 access that program, you just don't know?

11 A. Right. Well, the program, obviously that's  
 12 the program that the firm used. Now, whether they could  
 13 access, if you could go across cases that weren't cases  
 14 you worked on, I really just don't know.

15 Q. As an example could Mr. Fisten, on the, on  
 16 the Fortis, could he access your, your file on an  
 17 Epstein case?

18 A. I don't know.

19 Q. If someone accessed your file, accessed  
 20 your electronic file, would you necessarily know  
 21 that?

22 A. No.

23 Q. All right. So --

24 A. I don't believe so.

25 Q. It wouldn't show up that Michael Fisten,

1 A. Correct.

2 Q. Did, did any other lawyers other than  
 3 Mr. Adler or Mr. Berger attend any depositions?

4 A. Your memory is going to be as good as mine  
 5 there. I'm thinking. Mark Epstein's deposition was  
 6 attend by Russell Adler.

7 Q. He went with you to New York?

8 A. No. He didn't go with me to New York. He  
 9 attended the deposition, and I also attended the  
 10 deposition.

11 Q. Both in person?

12 A. Right.

13 Q. Was he there for another file or did he  
 14 meet you there to specifically attend Mark Epstein's  
 15 deposition?

16 A. Coincidence that he was in New York during the  
 17 time when his deposition was being taken.

18 Q. Any other lawyer that you can recall being  
 19 at a deposition other than Adler, Berger and  
 20 yourself?

21 A. Not right now. If you remind me, I, I may  
 22 remember. I don't remember right now.

23 Q. Did other lawyers in the firm at RRA  
 24 perform services on the files; that is, and by that  
 25 I mean did they, were they involved in drafting

1 motions, research, appeals, pleadings, papers that  
2 were filed?

3 MR. SCAROLA: You can, you can answer  
4 whether they were, there were other lawyers  
5 involved in drafting tasks without identifying  
6 what those may have been.

7 THE WITNESS: Other lawyers contributed to  
8 some extent to the prosecution of those cases.

9 BY MR. CRITTON:

10 Q. Who? Names. I'm not asking for tasks.

11 MR. SCAROLA: You can answer.

12 MR. CRITTON: I am asking for names.

13 THE WITNESS: Bill Berger, Judge Stone,  
14 Russell Adler, Rob Buschel.

15 BY MR. CRITTON:

16 Q. B-o-u-c-h-e-l?

17 A. I don't know how to spell it. B-u, I don't  
18 know how, B-u-s-c-h-e-l, I believe.

19 Q. All right. Is he currently with you now?

20 A. No.

21 Q. Any other lawyers?

22 A. And you're asking for no matter how minimal,  
23 just anything done by any lawyers?

24 Q. Correct.

25 A. Michael, I think his name is Michael. It was

1 another lawyer. That's, that's -- those are the ones  
2 that I can remember right now.

3 Q. Were there ever meetings that occurred,  
4 well, not -- were there ever specific meetings that  
5 were attended by various lawyers to discuss  
6 Epstein's cases?

7 MR. SCAROLA: You can answer whether there  
8 were meetings.

9 THE WITNESS: There were meetings to  
10 discuss every case including Jeffrey Epstein's  
11 cases.

12 BY MR. CRITTON:

13 Q. And when you say there were meetings to  
14 discuss every case, were there routine meetings that  
15 were held to discuss your cases or cases in general?

16 A. It's how the firm worked. If you wanted to  
17 discuss cases, or the case was a case that was thought  
18 to need more than one or more than two attorneys, then a  
19 meeting could easily be assembled within RRA to sit  
20 around the table and discuss issues related to any case.  
21 And yes, that happened with respect to cases filed  
22 against Jeffrey Epstein.

23 Q. And so there could have been additional  
24 lawyers in addition to Adler, Stone, Berger, and Rob  
25 Buschel and yourself that would have commented on an

1 Epstein case?

2 A. When I was giving you that list of names, I  
3 was picturing one of the couple meetings related to  
4 Jeffrey Epstein's case. Could there have been other  
5 lawyers in the room, yes, but I think that is the  
6 exclusive list.

7 Q. Did Mr., did anyone ever attend by phone  
8 meetings associated --

9 A. I understand.

10 Q. -- that involved Mr. Epstein?

11 A. I understand. No.

12 Q. Did Scott Rothstein ever attend any  
13 meetings wherein strategy was discussed regarding  
14 the Epstein cases?

15 A. No.

16 Q. The one meeting that you had in Mr.,  
17 Mr. Rothstein's office with Russell Adler and some  
18 unknown person on the phone, were you given any  
19 direction at that time that certain discovery should  
20 be done or certain tactics should be used with  
21 regard to prosecuting the Epstein cases?

22 MR. SCAROLA: Same objection, same  
23 instructions.

24 BY MR. CRITTON:

25 Q. Did you ever receive any e-mail

1 correspondence from Scott Rothstein that detailed or  
2 that set forth discovery that would be, that should  
3 be undertaken with regard to the Epstein cases?

4 MR. SCAROLA: You can answer that with a  
5 yes or no.

6 THE WITNESS: No.

7 BY MR. CRITTON:

8 Q. Did you ever have, did you ever receive  
9 any correspondence directly, Mr., Mr. Rothstein to  
10 you, during the time that you were at RRA?

11 A. Yes.

12 Q. Did any of the correspondence ever involve  
13 Epstein or communication ever involve Epstein?

14 MR. SCAROLA: You can answer that.

15 THE WITNESS: To some extent, yes.

16 BY MR. CRITTON:

17 Q. Okay. And what did, what did, what  
18 information did Mr. Rothstein send you that involved  
19 Mr. Epstein?

20 MR. SCAROLA: Same objection, same  
21 instruction.

22 BY MR. CRITTON:

23 Q. Is the information that you received or  
24 the communication you received from Mr. Rothstein  
25 regarding, that involved Mr. Epstein, was that by

1 way of e-mail?

2 A. Yes.

3 Q. Did you ever receive any memorandum from  
4 him; that is, a typewritten memo that was then sent  
5 to you through office mail that was not electronic  
6 involving Mr. Epstein?

7 A. No.

8 Q. At the meetings that you, at the meetings  
9 that occurred where these various lawyers, Berger,  
10 Adler, Stone, Rob Buschel were present and Epstein  
11 was discussed, was the discovery that, discovery  
12 and/or investigation regarding Mr. Epstein was that  
13 ever discussed?

14 MR. SCAROLA: Same objection, same  
15 instruction.

16 BY MR. CRITTON:

17 Q. Mr. Edwards, are you aware as a former  
18 state prosecutor that there are laws against  
19 conducting certain financial transactions in money  
20 that's derived from a crime?

21 A. I don't understand your question.

22 Q. Okay. Well, you were a former state  
23 prosecutor; is that correct?

24 A. Right. Yes.

25 Q. Right. Are you aware that there are

1 RICO claims.

2 Q. But you certain have brought RICO claims  
3 against Mr. Epstein?

4 A. I know about one now.

5 Q. Okay. At the time that you were at the  
6 State Attorney's Office, what kind of -- how long  
7 were you there?

8 A. Three years.

9 Q. And what kind of crimes did you prosecute?

10 A. Beginning with DUI's through attempted murders  
11 and everything in between. No -- well, not no, very few  
12 economic crimes, some insurance fraud cases but very  
13 few, otherwise drugs, guns, robberies, burglaries  
14 attempted murder, aggravated batteries, those types of  
15 crimes, false imprisonment.

16 Q. Well, were you ever, do you know what  
17 money laundering means in a criminal context?

18 A. In some basic sense I do know what money  
19 laundering means.

20 Q. What do you understand that to be?

21 A. That you, that the criminal takes money and  
22 through some illegal means attempts to make bad money  
23 legitimate.

24 MR. CRITTON: Let me show you what I will  
25 mark as Exhibit 2 which is the complaint that

1 certain laws both state and federal that, that are,  
2 that preclude conducting certain financial  
3 transaction, transactions in money that is derived  
4 from a crime?

5 A. Still don't understand your question. But  
6 first before I try to answer your question, are you  
7 taking me back to a time when I was a State Attorney and  
8 asking back then did I know and then your question?

9 Q. Yes.

10 A. Back when I was a State Attorney did I know  
11 that there are crimes related to money transactions?

12 Q. No.

13 MR. SCAROLA: Could I help you? Do you  
14 want to ask him whether he was aware of the  
15 existence of a state RICO statute?

16 MR. CRITTON: No.

17 MR. SCAROLA: Okay.

18 MR. CRITTON: I am okay with that first,  
19 but I am still going to ask my question.

20 BY MR. CRITTON:

21 Q. I assume you're aware of the existence of  
22 a state RICO statute, correct?

23 A. I don't know that I was aware of that back  
24 then. I just can't remember whether I knew about RICO  
25 back at the State Attorney's Office. I never prosecuted

1 was filed against Mr. Rothstein, yourself, and  
2 L.M.

3 (Plaintiff's Exhibit No. 2 was marked for  
4 identification.)

5 BY MR. CRITTON:

6 Q. You're familiar with this complaint, sir?

7 A. Unfortunately I have read this frivolous  
8 complaint.

9 MR. CRITTON: Move to strike as  
10 nonresponsive. You've seen -- all I want is a  
11 yes or no.

12 Are you familiar with this document?

13 MR. SCAROLA: I am going to object to the  
14 form of the question. It is vague and  
15 ambiguous. I don't know what familiarity  
16 means. He has seen it before.

17 BY MR. CRITTON:

18 Q. Mr. Edwards, you have seen and read the  
19 entire complaint along with the attachments,  
20 Exhibit 2?

21 A. I've read the complaint. I have never read in  
22 the entirety Exhibit 2.

23 Q. Are you familiar, do you know what an  
24 information is?

25 A. Yes.

1 Q. And that's Exhibit 1 attached to the  
2 complaint, correct?  
3 A. Correct.  
4 Q. And you're aware that, and this is the  
5 information that was brought by the United States of  
6 America, U.S.A. versus Scott Rothstein, correct?  
7 A. Yes.  
8 Q. And you're aware that within the -- well  
9 let me strike that. Are you aware that  
10 Mr. Rothstein has pled guilty to, excuse me, the  
11 information that was brought against him by the  
12 U.S.A.?  
13 A. I am aware that he pled guilty to something.  
14 Q. With regard to the complaint brought by  
15 the U.S.A., I am sorry, the information brought by  
16 U.S.A. against Mr. Rothstein, I assume you have read  
17 the allegations associated with the racketeering  
18 conspiracy, the pattern of racketeering activity,  
19 correct?  
20 A. I haven't.  
21 Q. Okay. If you turn to Page 3, Paragraph 4,  
22 were you aware, were you aware prior to coming in  
23 here today that Mr. Rothstein was, that the charges  
24 that were brought against him were for under, under  
25 RICO but with regard to mail fraud, wire fraud,

1 asserted that the firm was a racketeering  
2 enterprise, correct?  
3 A. Not necessarily -- no.  
4 Q. Well, if you look in Paragraph 2, see  
5 where the firm is identified as the enterprise of  
6 the racketeering conspiracy?  
7 A. Law firm. Paragraph 2 of the information says  
8 Rothstein Rosenfeldt Adler, P.A., was a law firm with  
9 offices located at 401 East Las Olas Boulevard, Fort  
10 Lauderdale, Florida, and elsewhere. The law firm  
11 employed approximately 70 attorneys and engaged in the  
12 practice of law involving a wide range of specialties  
13 including labor and employment law.  
14 Q. Are you in Paragraph 2?  
15 A. Of the information, yes.  
16 Q. I'm sorry. I am looking at -- my  
17 apologies. On Paragraph 2 under Count I, my error.  
18 A. Okay.  
19 Q. See where the law firm is identified as  
20 the racketeering enterprise?  
21 A. I'm sorry. Your question is am I, do I  
22 recognize that the law firm is categorized as an  
23 enterprise. Yes, in that paragraph I see that.  
24 Q. Have you had an occasion to discuss with  
25 any, with either Mr. Adler or Mr. Rosenfeldt any of

1 laundering of monetary instruments, engaging in  
2 monetary transactions, and conspiracy to launder  
3 monetary instruments and engage in monetary  
4 transactions?

5 A. I, I have read that in the newspapers. I have  
6 been told that by numerous people. So, yes, I was aware  
7 of that.

8 Q. And within the complaint at Paragraph 6 it  
9 says the Defendant --

10 A. The information or the complaint?

11 Q. I'm sorry. Within the information,  
12 Exhibit 1 to the complaint, in Paragraph 6 where it  
13 speaks in terms of the Defendant and his  
14 co-conspirators, conspirators agreed, agreed to  
15 engage in a pattern of racketeering activity through  
16 its base of operation at the offices of RRA. Do you  
17 see that?

18 A. Yes.

19 Q. Okay. Do you know who the, do you know  
20 any of the co-conspirators in addition who are  
21 associated with Mr. Rothstein?

22 A. Assuming that they are former employees of  
23 RRA, which I would presume several of them are, I am  
24 sure that I probably know them.

25 Q. And you're aware that the government has

1 the allegations directed to Mr. Rothstein --

2 A. No.

3 Q. -- in the criminal complaint?

4 A. No.

5 Q. Since the implosion at the firm have you  
6 had an occasion to talk about or speak or discuss  
7 any firm business regarding Mr. Rothstein and the  
8 ponzi scheme that he was running at RRA?

9 A. Have I had an occasion where I could have  
10 talked --

11 Q. No, I'm sorry. Have you had an occasion  
12 to discuss with Mr. Adler since you left the firm or  
13 since the implosion any aspects of the, of the ponzi  
14 scheme that Mr. Rothstein and his co-conspirators  
15 were running through the firm?

16 MR. SCAROLA: Are you asking whether he  
17 did have such a discussion or whether he had an  
18 occasion to have such a discussion?

19 BY MR. CRITTON:

20 Q. Did you have such a discussion?

21 A. No.

22 Q. Okay. Have you discussed that or have you  
23 seen Mr. Adler at all other than hi, hello, since --

24 A. Yes. So, the occasion existed. We just  
25 didn't have that discussion.

1 Q. Have you, and if I understand correctly  
 2 you haven't discussed any firm business with  
 3 Mr. Adler since the implosion; is that correct?  
 4 A. Firm business?  
 5 Q. Any firm RRA business?  
 6 A. Right, no.  
 7 Q. How about with Mr. Rosenfeldt, have you  
 8 had any discussions with him --  
 9 A. None.  
 10 Q. -- since the implosion of the firm in late  
 11 October of '09?  
 12 A. No.  
 13 Q. If you wanted, if you had any, other than  
 14 your existing partners have you had an occasion to  
 15 speak with any other partners or former partners of  
 16 the firm regarding the implosion -- well, let me  
 17 strike that -- regarding the ponzi scheme that was  
 18 being run by Mr. Rothstein through the firm?  
 19 A. I have spoken to my current partners about it.  
 20 Q. Are your current partners, are you aware  
 21 of any of your current partners being a target of an  
 22 investigation as a potential co-conspirator with  
 23 Mr. Rothstein?  
 24 A. No, way.  
 25 Q. You're not aware of or no one has told you

1 THE VIDEOGRAPHER: We are now off video  
 2 record --  
 3 MR. SCAROLA: That will be a refreshing  
 4 change.  
 5 THE VIDEOGRAPHER: We are now off video  
 6 record at 3:44 p.m.  
 7 (A brief recess was held.).  
 8 MR. CRITTON: Mr. Edwards --  
 9 THE VIDEOGRAPHER: We're back on video  
 10 record. It is 3:59 p.m.  
 11 BY MR. CRITTON:  
 12 Q. Mr. Edwards, when you joined RRA, if I  
 13 understood your earlier testimony, with regard to  
 14 the Epstein cases and your other cases when you came  
 15 there as far as you were concerned is you had the  
 16 ability to spend whatever money was necessary to  
 17 prosecute the Epstein cases, fair statement?  
 18 A. I don't know that that's true or it's not true  
 19 I mean.  
 20 Q. Well --  
 21 A. My judgment was never questioned.  
 22 Q. Correct. And therefore whatever monies  
 23 you spent either in investigation, in doing  
 24 discovery, that was your decision and your decision  
 25 alone, true?

1 that, correct?  
 2 A. I am not aware of that and nobody has told me  
 3 that.  
 4 Q. Mr. Rothstein founded what was, what  
 5 ultimately became RRA in approximately 2002. Were  
 6 you aware of that fact?  
 7 A. No.  
 8 Q. How long did you think Mr. Rothstein had  
 9 been -- well, let me strike that. How long did you  
 10 think RRA had been in existence prior to your  
 11 joining the firm? What were you told?  
 12 A. I don't know what I was ever told. I think  
 13 that I learned that information when the implosion, as  
 14 you call it, occurred.  
 15 Q. And were you, in terms of what the  
 16 revenues of the firm were, were you ever advised  
 17 what the revenues of the firm were?  
 18 A. No.  
 19 Q. Okay. Were you, were you familiar with  
 20 what the expenses were associated with operating the  
 21 RRA firm?  
 22 A. No.  
 23 Q. Were you in anyway -- well, let me strike  
 24 that. With regard to -- let me take a five minute  
 25 break and let me collect my thoughts.

1 A. Whatever money that I spent was my decision --  
 2 Q. No. Whatever money you spent on  
 3 investigators, on doing depositions, on requesting  
 4 transcripts, on doing what was necessary to  
 5 prosecute the Epstein cases, that was your decision?  
 6 A. No. The actions were my decisions in terms of  
 7 how to prosecute the case. The amount of money to spend  
 8 per exercise was not my decision nor was I privy to that  
 9 information.  
 10 Q. Well, but, you were the one who directed  
 11 that the particular task be taken, correct?  
 12 MR. SCAROLA: This is, this is  
 13 repetitious.  
 14 MR. CRITTON: I am setting a stage.  
 15 MR. SCAROLA: This is repetitious of areas  
 16 of examination that were covered thoroughly in  
 17 the earlier portions of this deposition.  
 18 THE WITNESS: If I wanted a witness  
 19 interviewed, I could ask an investigator to  
 20 interview. The investigator, how they were  
 21 paid, how much they were paid, whether they  
 22 were paid is not something that I had any  
 23 knowledge of at all.  
 24 BY MR. CRITTON:  
 25 Q. Okay. When you ran your own firm you

1 obviously knew what, whether hiring an investigator  
 2 or what a particular cost was because you had to pay  
 3 it, correct?

4 A. Yes.

5 Q. Okay. And I think as you described  
 6 earlier is that there had been very little discovery  
 7 up until the time you started working for RRA in  
 8 your three cases, true?

9 A. Not very little discovery. Obviously we had  
 10 gone through interrogatories, responses, request for  
 11 production, responses or lack of responses, however, the  
 12 majority of the depositions that were taken, the cases  
 13 just happened to be right last summer for most of those  
 14 depositions to take place, and that's what happened.

15 Q. Not only depositions but as well the  
 16 investigation as you have described, your  
 17 investigator that you hired as an outside person  
 18 didn't really start until late March or early April  
 19 in conjunction with the other investigation that you  
 20 did during the time you were with RRA, correct?

21 A. Fair statement.

22 Q. All right. And when you were at RRA you  
 23 described earlier, and I won't belabor it, but you  
 24 described the compound I think is the word that you  
 25 used that Mr. Rothstein kept himself in when he was

1 Q. Okay. Were they all on the, were they,  
 2 were they --

3 A. Some were B.S.O as well. Some were Broward  
 4 Sheriff's Office. Some were from Fort Lauderdale. It  
 5 was both.

6 Q. With, with regard to the police officers  
 7 and the Sheriff's Deputy's that were present, where  
 8 they on every floor of RRA?

9 A. It seemed that way.

10 Q. And had you ever been in a, in a law firm  
 11 either as a visitor or as an employee or partner  
 12 where you had seen armed guards from either a  
 13 Sheriff's Office or a police department roaming the  
 14 halls?

15 A. No.

16 Q. Had you ever been to the RRA offices  
 17 before you accepted the job?

18 A. No.

19 Q. When you got there and you saw the armed  
 20 guards patrolling the floors, did you ever have a  
 21 conversation with Russell Adler or anyone else as  
 22 like what in heaven's name is going on here?

23 A. I didn't see them when I first got there.

24 Q. How much time passed before you saw the  
 25 guards?

1 at the firm, correct?

2 A. Correct.

3 Q. Right. And he was not accessible to  
 4 everyone else, true?

5 A. Right.

6 Q. And was he on your floor or was he on a  
 7 completely separate floor?

8 MR. SCAROLA: As opposed to a partly  
 9 separate floor.

10 THE WITNESS: For the most part he was on  
 11 a separate floor.

12 BY MR. CRITTON:

13 Q. Okay. And were there guards during the  
 14 time that you were at, at the RRA firm, RRA, were  
 15 there ever guards that patrolled the hallways?

16 A. Yes.

17 Q. And was that from the day you started?

18 A. I believe so.

19 Q. And had you ever been in a firm where --  
 20 bless you. Had you ever been in a firm where  
 21 there -- well, let me strike that. The guards were  
 22 what, Broward County Sheriff's Officers?

23 A. I don't remember the agency but they were  
 24 armed uniformed police officers. I believe Fort  
 25 Lauderdale.

1 A. When I first started I believe that the people  
 2 patrolling, I'm not sure that they initially were  
 3 Broward Sheriffs or Fort Lauderdale police. I think  
 4 that may have been a month after I began. From what I  
 5 remember seeing, and I can envision the people in my  
 6 head, they were private security people. At least that  
 7 was the appearance or the interpretation that I had.  
 8 And I didn't question it at the time who they were.

9 Q. Within --

10 A. I don't think.

11 Q. Within a short period of time though you  
 12 recognized that they were either Sheriff's Deputies  
 13 or police officers?

14 A. At the point in time where I recognized that  
 15 they were armed uniformed police officers in the firm,  
 16 yes, I questioned it not only to Russell Adler but to  
 17 anybody else, anybody else, because all of the lawyers  
 18 in the firm thought it was strange.

19 Q. Okay. And what did Adler tell you?

20 A. That Scott Rothstein has a lot of money, prior  
 21 to you being here, a female attorney was murdered and he  
 22 wants to make sure that his friends and family are as  
 23 secured as possible, that while he has this extra money  
 24 to spend on security, he is going to do that for all of  
 25 our safety.

1 Q. Did you understand as well that he had,  
 2 that the firm was paying for armed guards to guard  
 3 his house 24 hours a day?

4 A. No.

5 Q. When did you learn that fact?

6 A. After the disbandment of RRA.

7 Q. Did Mr. Adler tell you that Mr. Rothstein  
 8 had amazing or substantial wealth?

9 A. I don't know in those words, but I, I  
 10 definitely understood that.

11 Q. Okay. In meeting Mr. Rothstein initially,  
 12 initially for the ten minutes as you were  
 13 contemplating taking a job and on the two other  
 14 occasions or the one other occasion when you saw him  
 15 out in the restaurant, I think you described him as  
 16 flamboyant?

17 A. I'm not sure I used that word but probably one  
 18 synonymous, and, yes, I would describe him as such.

19 Q. Was he someone that at least -- well, let  
 20 me strike that. Were you aware that he had a, a  
 21 watch collection of hundreds of watches?

22 A. No.

23 Q. Did you see him wear expensive jewelry  
 24 when you saw him; that is, the few occasions that  
 25 you saw him?

1 A. Never. I didn't take notice of that.

2 Q. Okay. When you saw him, was he dressed in  
 3 a suit or was he dressed in business, or in casual,  
 4 more casual clothes?

5 A. Always a suit.

6 Q. And looking like a million bucks?

7 A. Looking ridiculous.

8 Q. But something that looked very expensive,  
 9 flashy, showy?

10 A. I couldn't tell how expensive it was, but  
 11 flashy and showy, yes. It may be a pink shirt with a  
 12 purple tie and a blue suit, something that you would  
 13 never expect a lawyer to be wearing, yes.

14 Q. And in terms of the, in terms of the, of  
 15 his personal wealth or his, his personal assets,  
 16 were you aware of where he lived?

17 A. Was I aware when?

18 Q. During the time you worked for RRA

19 A. Yes.

20 Q. Okay. And were you aware that he was  
 21 living in a multi-million dollar house?

22 A. When, when I went to the house I, I recognized  
 23 it as such.

24 Q. You said you want to the house. Did you  
 25 go to Mr. Rothstein's house?

1 A. I went there one time.

2 Q. For what occasion?

3 A. I don't remember the occasion, but it was a  
 4 gathering that he had at his house and he asked, during  
 5 the course of me working there were ten occasions where  
 6 everybody was invited to go to his house for various  
 7 events and on one occasion, I went.

8 Q. Oh, all right. And from being in his  
 9 house did you recognize immediately that this was a  
 10 multi-million dollar house?

11 A. Yes.

12 Q. Okay. Was it on the water?

13 A. Yes.

14 Q. And could you tell from the interior  
 15 design or the decorations that existed that this was  
 16 at least a man, a man that had significant wealth?

17 A. Yes.

18 Q. All right. And could you, did you have an  
 19 opportunity to see his collection of automobiles?

20 A. No.

21 Q. During the time that you were in the  
 22 house, did you have an opportunity, did, did you  
 23 walk around the house?

24 A. No.

25 Q. How many people were there, best estimate?

1 Are we talking like ten or 12?

2 A. No, no, no. 250.

3 Q. Did you talk to Mr. Rothstein at all?

4 A. Not even for a second.

5 Q. Could you walk anyplace in the house that  
 6 you wanted?

7 A. The party, at least to the extent that I  
 8 participated in it, was outside. So I, I don't know if  
 9 I could have walked around the house, but I did not walk  
 10 around the house nor did I really walk inside the house  
 11 other than to go in the front door, straight out back,  
 12 and then leave the exact same pathway that I entered.

13 Q. What his property located on Castillo  
 14 Island?

15 A. I don't know.

16 Q. Were you aware or did you become aware  
 17 that Mr., during the time that you were there that  
 18 Mr. Rothstein had investments in multiple real  
 19 properties?

20 A. No.

21 Q. Were you aware at the time that you met  
 22 him first at the BOVA restaurant that he had an  
 23 interest in BOVA restaurant?

24 A. When I met him, no.

25 Q. Did he have an interest in BOVA restaurant

1 at that time?  
 2 A. I heard that sometime after I began working  
 3 there. He certainly acted like he did.  
 4 Q. Did you learn that he had investments in  
 5 other business entities, whether they were other  
 6 restaurants or other business entities --  
 7 A. Through --  
 8 Q. -- during the time that you worked at RRA?  
 9 A. Through rumors.  
 10 Q. And rumor was he had his fingers in many  
 11 different businesses?  
 12 A. It sounded like hundreds.  
 13 Q. And did you understand that he had a  
 14 substantial collection of automobiles?  
 15 A. What do you mean by substantial selection or  
 16 collection?  
 17 Q. Well, were you, during the time that you  
 18 were at RRA were you aware that he had Ferraris?  
 19 A. No.  
 20 Q. Multiple Ferraris?  
 21 A. No.  
 22 Q. Were you aware that he had a Bentley?  
 23 A. Yes.  
 24 Q. Were you aware that he had a Bugatti?  
 25 A. I heard that.

1 A. No.  
 2 Q. Were you aware that he had multiple jet  
 3 skis?  
 4 A. No.  
 5 Q. Were you aware that he had a 55-foot Sea  
 6 Ray?  
 7 A. No.  
 8 Q. Were you aware that he owned a  
 9 Lamborghini?  
 10 A. No.  
 11 Q. Again during the time that you were at  
 12 RRA?  
 13 A. I understand that. The answer is no.  
 14 Q. In addition to the, to the business of  
 15 owning BOVA what other business ventures did you  
 16 understand he had? I think you said you thought he  
 17 was in hundreds of businesses.  
 18 A. Through a rumor.  
 19 Q. Right.  
 20 A. I understood that he owned a Vodka. I  
 21 understood generically that he owned or purchased  
 22 various patents. I understood -- I didn't know what the  
 23 patents were. I understood that he owned other  
 24 restaurants. I understood that he owned or was partial  
 25 owner of Cafe Iguana.

1 Q. Were you aware that he had a Rolls Royce?  
 2 A. No.  
 3 Q. Were you aware that he had multiple  
 4 Corvettes?  
 5 A. No.  
 6 Q. Either a Corvette or multiple Corvettes?  
 7 A. No.  
 8 Q. Were you aware that he had multiple  
 9 Mercedes Benz?  
 10 A. No.  
 11 Q. Were you aware that he owned a yacht?  
 12 A. Yes.  
 13 Q. Okay. And was that parked behind his  
 14 house?  
 15 A. Yes.  
 16 Q. Were you aware that he also -- and did it,  
 17 if I was to say it was approximately an 85 to  
 18 90-foot yacht or, in fact, an 87-foot yacht?  
 19 A. I wouldn't quarrel with that.  
 20 Q. Did it also appear that he had a  
 21 substantial sport fisherman that was parked out  
 22 there as well?  
 23 A. I didn't see that.  
 24 Q. Were you aware that he had 33-foot Aqua,  
 25 Aquaviva?

1 At some point in time I learned that he  
 2 was owner or partial owner of the Versace mansion.  
 3 And I think in general it was always explained to me  
 4 or I overheard he had, he has his hands in all of  
 5 these, this assortment of businesses and those  
 6 business ventures have done very well, and that is  
 7 the source of his apparent extreme amount of wealth.  
 8 Q. Who told you that?  
 9 A. I don't, I don't know. More, more than one  
 10 person. I mean, that was just kind of the word around  
 11 the campfire so to speak.  
 12 Q. Did you inquire as to -- let me strike  
 13 that. Did you ever see any documents that reflected  
 14 or documents or read any information about  
 15 Mr. Rothstein that preexisted 2002 which was kind of  
 16 the start of the RRA firm?  
 17 A. I don't understand.  
 18 Q. Okay. Well, I think we established  
 19 earlier that your understanding was that RRA kind of  
 20 started as a firm in the 2002 time frame.  
 21 A. Well, you told me that and I have been told  
 22 that after the implosion that that was the time period  
 23 that RRA started. I didn't know anything about Scott  
 24 Rothstein until the year 2009 at all.  
 25 Q. Did you do any research with regard to

1 Mr. Rothstein prior to going to the firm and by  
 2 research I mean people Google. Did you Google him?  
 3 A. No.  
 4 Q. Did you, did the firm have a brochure?  
 5 A. I don't know.  
 6 Q. Did you ever see brochures in the waiting  
 7 room or the reception rooms that described the firm  
 8 when it was founded, background of the firm, et  
 9 cetera?  
 10 A. No.  
 11 Q. Was it on your web site?  
 12 A. Was what on my web site?  
 13 Q. The history or the background of the firm.  
 14 Let me strike that. RRA had a website?  
 15 A. RRA had a website.  
 16 Q. That's no longer in existence, true?  
 17 A. True.  
 18 Q. And --  
 19 A. To my knowledge.  
 20 Q. Did you ever go on the website and  
 21 checkout the web site for the history or the  
 22 background of RRA and Mr. Rothstein?  
 23 A. I went on the website. I don't know that the  
 24 website even had a history. If it did, I don't remember  
 25 ever looking at it.

1 Q. Did it, did, at least from what you saw  
 2 and observed of Mr. Rothstein, did it appear to you  
 3 that the, his wealth far exceeded the type of  
 4 business that it appeared to you that the firm was  
 5 doing?  
 6 A. I have no understanding whatsoever. No,  
 7 that's not something that ever crossed my mind.  
 8 Q. Well, under these circumstances is, is  
 9 when you went to the firm, you had the ability to  
 10 your discretion to spend whatever monies you wanted  
 11 in prosecuting your personal injury and Epstein  
 12 cases. You, no one ever turned down a request  
 13 either for a reimbursement or told you not to expend  
 14 any money, true?  
 15 MR. SCAROLA: Objection, compound and  
 16 repetitious.  
 17 THE WITNESS: I don't understand the  
 18 question.  
 19 BY MR. CRITTON:  
 20 Q. No one, as to any expenditure that you  
 21 ever made on an Epstein case --  
 22 MR. SCAROLA: Isn't this about the fourth  
 23 time that you're eliciting exactly the same  
 24 testimony? Isn't it very clear the extent to  
 25 which Mr. Edwards had control over financial

1 matters with regard --  
 2 MR. CRITTON: Form?  
 3 MR. SCAROLA: -- to these cases?  
 4 MR. CRITTON: Form?  
 5 MR. SCAROLA: No, no. It's a, it's a  
 6 speaking inquiry.  
 7 BY MR. CRITTON:

8 Q. Mr. Edwards, did you ever have any  
 9 dealings with Deborah Villegas?  
 10 A. No.  
 11 Q. Am I saying it right?  
 12 A. I don't know.  
 13 Q. V-i-l-e-g-a-s?  
 14 A. I've seen the name.  
 15 Q. Did you know who she was?  
 16 A. In what way?  
 17 Q. As it related --  
 18 A. I knew that she worked for the firm.  
 19 Q. What did you understand her position was?  
 20 A. Rothstein's Sarah Kellen.  
 21 Q. Did you understand her to be the COO of  
 22 the company, of the firm?  
 23 A. Right. I don't know if COO or whatever, but  
 24 his right-hand man; that's the person who gets him what  
 25 he wants. That's at least in a broad term what I

1 understood her position to be.  
 2 Q. Did you understand she was a financial  
 3 person?  
 4 A. No.  
 5 Q. Or an administrative person?  
 6 A. My understanding was administrative.  
 7 Q. With regard to Mr. Rothstein's; that is,  
 8 his real property, his vehicles, his boats, his  
 9 business interests, would it be a correct statement,  
 10 sir, that you weren't concerned about the source of  
 11 his wealth?

12 A. You went through a list of the things that I  
 13 knew or did not know him to have in terms of assets.  
 14 And I told you for the most part I didn't even know that  
 15 he had those things. In fact, while you were out of the  
 16 room, I just educated myself by reading the information  
 17 on some of the things he had and I didn't know until  
 18 right now that he had those things. But certainly while  
 19 I was working at RRA I didn't know that he had those  
 20 things.

21 Q. Then let me be specific. With regard to  
 22 the, with regard to the house that you knew he had,  
 23 with regard to the yacht that you knew he had, with  
 24 regard to the vehicles that you knew he had, with  
 25 regard to the business interests, at least BOVA and

1 at least what was rumored to be his business  
 2 interest, did you believe that the source of his, of  
 3 his apparent wealth was as a result of the law firm?

4 A. I believe that the source of his wealth was  
 5 the law firm as well as the, what I have described as an  
 6 assortment of businesses that he had his hands in of  
 7 which only a fraction I was aware.

8 Q. Well, what did you understand to be the  
 9 source of the funding of the, of the Epstein cases  
 10 and the other lawsuits that you had?

11 A. The checks I believe were written by the law  
 12 firm.

13 Q. Okay. And what did you believe was the  
 14 source of the monies that the law firm got to expend  
 15 some, just on the three cases that you had with Mr.  
 16 Epstein, some three to \$500,000, I mean separate and  
 17 apart from all of the, your other personal injury  
 18 cases and separate and apart from all of the other  
 19 69 lawyers who were in the law firm who also had  
 20 cases?

21 A. I didn't have a belief at all as to the source  
 22 of any of the monies that were used for any of the case.

23 Q. Was it your position it really wasn't your  
 24 concern; that is, wherever the money came from, it  
 25 didn't bother you; all you knew is that the firm was

1 things of that nature.

2 Q. And that's my question to you: Did you  
 3 hear these names before or during the time that you  
 4 were at RRA as distinct from now?

5 A. Of that list you just read until right this  
 6 second, Michael Szafranski is the only one that I have  
 7 ever heard of and that was after implosion of RRA

8 Q. And again this question is specific to the  
 9 time frame --

10 A. Sure.

11 Q. -- that you were there? Dominic  
 12 Ponatchio, P-o-n-a-t-c-h-i-o.

13 A. No.

14 Q. Moto, M-o-t-o, Ban, B-a-n, Adon, A-d-o-n?

15 A. No.

16 Q. Ever heard of Benozon (phonetic) Varon,  
 17 V-a-r-o-n?

18 A. No.

19 Q. Onyx Capital?

20 A. No.

21 Q. Onyx Options Consultants?

22 A. No.

23 Q. BWS Investments?

24 A. No.

25 Q. Pirulin, P-i-r-u-l-i-n, Group?

1 funding your cases?

2 MR. SCAROLA: Objection, argumentative.

3 THE WITNESS: Yeah. At the time I believe  
 4 that I am working at a well recognized law firm  
 5 with good people and that is a successful law  
 6 firm and this is the way that law firms at that  
 7 level operate, and right, I didn't --

8 BY MR. CRITTON:

9 Q. Didn't care?

10 A. Right, I didn't care. I didn't question it.

11 Q. With, with regard to, let me ask you some  
 12 names and see if you recognize the names. Do you  
 13 know a person by the name of Barry Bekkadan,  
 14 B-e-k-k-a-d-a-n?

15 A. Never heard the name until right now.

16 Q. A.J. Discala?

17 A. Again same answer.

18 Q. Clockwork Capital Advisers?

19 A. No, never heard of them.

20 Q. Razorback Funding?

21 A. Never heard of it.

22 Q. Michael Szafranski, S-z-a-f-r-a-n-s-k-i?

23 A. Heard that name --

24 Q. And --

25 A. -- only after implosion and through papers and

1 A. No.

2 Q. Shimone (phonetic) Levy, L-e-v-y?

3 A. No.

4 Q. Obidia Levy, O-b-i-d-e, I'm sorry, d-i-a?

5 A. No.

6 Q. Daniel Minkowitz, M-i-n-k-o-w-i-t-z?

7 A. No.

8 Q. Fortress, an entity know as Fortress  
 9 Investments or Fortress Capital?

10 A. No.

11 Q. Drawbridge?

12 A. No.

13 Q. Capital or funding?

14 A. No.

15 Q. Do you know an individual by the name of,  
 16 have you ever heard of, heard during that time  
 17 period, did you hear of or know a person named  
 18 George Levin, L-e-v-i-n?

19 A. No.

20 Q. Banyan Investment Fund?

21 A. No.

22 Q. Did you know or hear of the name Frank  
 23 Preve, P-r-e-v-e?

24 A. No.

25 Q. Okay. Mr. Preve is purportedly, was

1 purported to have an office within RRA's offices.  
 2 Have you seen that?  
 3 A. Have I seen what?  
 4 Q. Have you seen that in any of the news  
 5 media, that Mr. Preve had an office within RRA?  
 6 A. That name doesn't sound familiar at all. So,  
 7 no, the answer to your question is no, I haven't seen  
 8 that.  
 9 Q. Bill Brock?  
 10 A. Yes.  
 11 Q. Okay. Who is Mr. Brock?  
 12 A. In the law firm he went by the name Uncle  
 13 Bill.  
 14 Q. Okay. All right. Who is Uncle Bill?  
 15 A. Who do I understand him to be? I don't know  
 16 who he really was. At this point in time looking back,  
 17 there is no telling what anyone, what anyone or anything  
 18 was. But at the time I believe that he was a relative  
 19 of Scott Rothstein's.  
 20 Q. What did he do? What did, what did Uncle  
 21 Bill do --  
 22 A. Some --  
 23 Q. -- at the firm?  
 24 A. Something with money.  
 25 Q. Did he have an office at the firm?

1 A. No.  
 2 Q. Ed Morse?  
 3 A. No.  
 4 Q. Richard Pearson, P-e-a-r-s-o-n?  
 5 A. No.  
 6 Q. Steven Levin, L-e-v-i-n?  
 7 A. No.  
 8 Q. Ira Sochet? S-h or Sochet, S-o-c-h-e-t?  
 9 A. No.  
 10 Q. Mark Melvin?  
 11 A. No.  
 12 Q. Jack Samoney (phonetic)?  
 13 A. No.  
 14 Q. Lawrence King?  
 15 A. No.  
 16 Q. Steve Jackel?  
 17 A. No.  
 18 Q. Have you ever heard an attorney name  
 19 Michael Legamaro?  
 20 A. No.  
 21 Q. Kevin Draher, D-r-a-h-e-r?  
 22 A. No.  
 23 Q. David Boden, do you know David Boden?  
 24 A. Yes.  
 25 Q. Okay. Who is Mr. Boden, an associate --

1 A. I think the trustees are still trying to  
 2 figure out what he exactly did do.  
 3 Q. Did you have any dealings with him?  
 4 A. Dealings, no, I didn't have dealings.  
 5 Q. Dealings of any kind?  
 6 A. I talked to him.  
 7 Q. Did you ever discuss any of your cases?  
 8 Was he -- he wasn't a lawyer?  
 9 A. Far from it.  
 10 Q. All right. Did you ever discuss any of  
 11 your cases with him?  
 12 A. No.  
 13 Q. Just a hi, hello?  
 14 A. Hi, hello, and I was one of the lawyers who  
 15 would come in often and work on weekends and he would be  
 16 there. That's when I would see him, and he would kind  
 17 of, hey, how are you doing on a weekend.  
 18 Q. And do you know a Dean Kretchmar,  
 19 K-r-e-t-c-h-m-a-r?  
 20 A. No.  
 21 Q. Same question again, do, these names  
 22 during the time period, Doug Van Allman,  
 23 A-l-l-m-a-n?  
 24 A. No.  
 25 Q. Ted Morse?

1 A. Are you asking me what I know now or what I  
 2 thought then?  
 3 Q. Who did you understand Mr. Boden, David  
 4 Boden to be when you became employed or associated  
 5 with RRA in April of '09?  
 6 A. In April of '09 I had not heard the name but  
 7 let's just skip to it. Sometime in let's say June or  
 8 July, I am guessing, sometime during the summer, I  
 9 understood him to be a lawyer at the firm.  
 10 Q. Did you understand, did you understand he  
 11 was a Florida lawyer or you just understood he was a  
 12 lawyer?  
 13 A. I understood he was a lawyer. I made the  
 14 presumption or assumption at that time that since he was  
 15 a lawyer for RRA that he was a Florida lawyer. I have  
 16 subsequently learned otherwise.  
 17 Q. Did you know, did you ever have any  
 18 business dealings with Mr. Boden?  
 19 A. Never spoke a word to the guy.  
 20 Q. What did you understand that he actually  
 21 did at the firm?  
 22 A. Had no idea.  
 23 Q. How about Andrew Barnett?  
 24 A. Don't know who that is.  
 25 Q. There was an individual, he is described

1 as the director of Corporate Development for RRA  
 2 A. I don't know even know what that means.

3 Q. Have you ever heard of the Centurion  
 4 Credit Fund or the Platinum Management Fund?

5 A. No.

6 Q. Alan Sakowitz?

7 A. No. Wait. Alan Sakowitz. I have heard that  
 8 name recently. I don't know why. I believe I actually  
 9 heard that name in a response. Never mind. In some  
 10 nonresponsive answer that your client gave, I heard that  
 11 name.

12 MR. SCAROLA: Keep going.

13 BY MR. CRITTON:

14 Q. Mr. Edwards, with regard to your phone,  
 15 did you have a direct line at RRA?

16 A. Yes.

17 Q. What was that phone number?

18 A. I don't remember.

19 Q. And is your cellphone today the same as it  
 20 was back then?

21 A. Yes.

22 Q. And what's that number, please?

23 MR. SCAROLA: Cellphone number?

24 THE WITNESS: 954-294-9544.

25

1 BY MR. CRITTON:

2 Q. Did you ever have a firm cellphone or just  
 3 your own personal cellphone?

4 A. No. Just my own personal cellphone.

5 Q. During the time that you were at the firm,  
 6 were you ever involved in making any type of a  
 7 presentation to anyone regarding the Epstein cases?

8 A. Including other lawyers within the firm?

9 Q. Let me rephrase it. I am going to  
 10 rephrase. You already told us that you have talked  
 11 about the Epstein cases with other lawyers, correct?

12 A. Right.

13 Q. Were you ever present in a meeting where  
 14 there was a person whom you did not know wherein the  
 15 Epstein, where the Epstein cases were discussed?

16 A. No.

17 Q. At the, 0when you met with Mr. Rothstein  
 18 in his office when Mr. Adler or whoever asked you to  
 19 come up that one time and there was Adler, Rothstein  
 20 and yourself, you said there was an individual on  
 21 the phone?

22 A. Right. It was another lawyer with the firm.

23 Q. And how do you know it was another lawyer  
 24 with the firm?

25 A. It was either Marc Nurik or Mark Fistros, Mark

1 Fistros is my partner now. Marc Nurik is the lawyer who  
 2 represents Scott Rothstein now. I don't know which it  
 3 was, but it was one of the two.

4 Q. Okay. Were you ever present at a meeting  
 5 where someone who you didn't know was present when  
 6 the Epstein case was discussed?

7 A. No.

8 Q. Were you ever asked to get on a phone call  
 9 where the Epstein cases were discussed that you  
 10 didn't, that you couldn't confirm who, you may have  
 11 someone who may have said this is Joe Smith on the  
 12 other line, but where you discussed the Epstein case  
 13 over the phone with another lawyer from your firm?

14 A. I don't understand that question.

15 Q. Did you ever make a phone call or did you  
 16 ever receive a phone call where you discussed the  
 17 Epstein case with another lawyer in your firm; that  
 18 is, that person --

19 A. Yes.

20 Q. -- outside of the office?

21 A. What?

22 Q. Okay. Obviously you would get calls  
 23 within --

24 A. Even you.

25 Q. -- the confines of your office. Right. I

1 understand that.

2 A. You fall in that category. I am having a hard  
 3 time.

4 Q. The question is did you ever have, were  
 5 you ever conferred in on a call that was supposed  
 6 to be among RRA lawyers regarding an Epstein case?

7 A. No.

8 Q. Did anyone ever request that you prepare a  
 9 summary of any of your Epstein cases that you in  
 10 turn sent by either e-mail or memo to anyone else?

11 A. I don't believe so.

12 Q. After you joined the RRA firm in April of  
 13 '09, did there come a point in time when you  
 14 requested that, that you requested the depositions  
 15 be taken out of state of a number of witness? Well,  
 16 let me ask you this question.

17 MR. CRITTON: Let me, let make it easy.

18 Let me show what I will mark as Exhibit 3.

19 (Plaintiff's Exhibit No. 3 was marked for  
 20 identification.)

21 BY MR. CRITTON:

22 Q. Before I get to that, Mr. Edwards, were  
 23 you aware of any cases that Mr. Rothstein himself  
 24 settled for over \$5 million while you were employed  
 25 at the firm?

1 A. I was never aware of any cases that Rothstein  
 2 even handled much less settled.  
 3

4 Q. Were you aware of whether, did anyone ever  
 5 tell you whether Mr. Rothstein even did legal work  
 6 at the firm or whether he was just a rainmaker?  
 7

8 A. I -- no, no one ever told me one way or the  
 9 other.  
 10

11 Q. Would it be a correct statement that you  
 12 never saw him perform any legal work during the time  
 13 you were at the firm?  
 14

15 A. That's a correct statement.  
 16

17 Q. Would it be a correct statement as far as  
 18 you knew he was kind of a gadfly going to his  
 19 various business ventures and then he would hole  
 20 himself up in the office.  
 21

22 A. He was the guy on the billboards and at the  
 23 Triple A arena and everything else marketing the firm  
 24 and bringing business in, and that's at least what I  
 25 believe he did. If it's true or not, I don't know to  
 this day.

26 Q. With regard to Exhibit 3, do you recognize  
 27 this e-mail?  
 28

29 A. I, I don't recognize the e-mail.  
 30

31 Q. Do you recognize, and I will represent to  
 32 you that I received the e-mail. It was sent to me  
 33

1 Q. Do you recall sending or directing that  
 2 this facsimile be sent. Or let me strike that. Who  
 3 was your secretary at that time? Who is, well, BJE  
 4 is you. Who is the MGL?  
 5

6 A. Who is the MGL? Let's see.  
 7

8 Q. On Page 2. There are your initials,  
 9 Bradley J. Edwards, BJE, and then MGL. Do you  
 10 recognize that?  
 11

12 A. No. I mean, as you are very aware problems  
 13 with secretaries during that period of time, I, I had  
 14 more than my share and that could have been a time  
 15 period where I did not have a legal assistant at all.  
 16 And I do not recognize the initials MGL to identify  
 17 anybody that I know.  
 18

19 Q. With regard to the individuals who were  
 20 listed in Exhibit 3, specifically Donald Trump,  
 21 Leslie Wexner, Bill Clinton, with those individuals,  
 22 you sent out this facsimile or at least your office  
 23 sent out the fax, Exhibit 3, requesting dates for  
 24 these individuals to be deposed, correct?  
 25

26 A. Yes.  
 27

28 Q. All right. Prior to your joining RRA you  
 29 had never requested either that the deposition of  
 30 Mr. Trump be taken, Mr. Wexner, nor Bill Clinton,  
 31 correct?  
 32

1 as well although I am not shown as a recipient, I  
 2 received e-mail.  
 3

4 THE WITNESS: Are you talking about the  
 5 fax?  
 6

7 MR. CRITTON: I am sorry, the fax.  
 8

9 MR. SCAROLA: Exhibit, Exhibit 3.  
 10

11 MR. CRITTON: Exhibit 3. Let me start  
 12 again. Exhibit 3 is a fax.  
 13

14 THE WITNESS: Correct.  
 15

16 MR. CRITTON: Dated July 22nd, 2009.  
 17

18 THE WITNESS: I recognize that.  
 19

20 BY MR. CRITTON:  
 21

22 Q. And do you recognize on Page 2, it says  
 23 very truly yours, Rothstein, Rosenfeldt, Alder and  
 24 then there is a, what appears to be a signature and  
 25 under that it says Bradley J. Edwards, Esquire,  
 partner fort (sic) the firm. Do you see that?  
 26

27 A. Yes, I see that.  
 28

29 Q. Do you recognize the signature?  
 30

31 A. No.  
 32

33 Q. Is that how you sign your name?  
 34

35 A. No.  
 36

37 Q. Do you know whose signature that is or  
 38 purports to be?  
 39

40 A. I have absolutely no idea.  
 41

1 A. I never requested a deposition to be taken  
 2 including any deposition of those three individuals.  
 3

4 Q. I understand but all right.  
 5

6 A. The answer to your question is, yes.  
 7

8 Q. All right. Thank you. Paula Heil, do you  
 9 know who that person is?  
 10

11 A. Do I know who it is? I know that it's  
 12 somebody who was involved with Bear Sterns at some point  
 13 in time.  
 14

15 Q. You also requested dates, and in fact  
 16 served a subpoena on Alan Dershowitz, the Harvard  
 17 law professor, correct?  
 18

19 A. Correct.  
 20

21 Q. And Mr. Dershowitz you were aware was one  
 22 of Mr. Epstein's criminal defense lawyers, correct?  
 23

24 A. At some point in time, I knew that in the past  
 25 he had been an attorney of Mr. Epstein.  
 26

27 Q. Well, you had, you had certain records  
 28 from the State Attorney's Office, didn't you, or  
 29 from the police report?  
 30

31 A. And that's what I'm saying, yes, involved in  
 32 the civil cases with us, no, I didn't know that he had  
 33 involvement. But, yes, I did know he was a former --  
 34

35 Q. I'm sorry, go ahead --  
 36

37 A. I did know that he was a former attorney of  
 38

1 Jeff Epstein.

2 Q. Well, you also understood Mr. Epstein has  
3 had ongoing criminal law issues even during the time  
4 of the civil case, correct?

5 A. No.

6 Q. Sure. Well, you were aware that  
7 Mr. Epstein was operating under the nonprosecution  
8 agreement, that he was bound by the, a  
9 nonprosecution agreement, correct?

10 A. I'm aware of the existence of a nonprosecution  
11 agreement.

12 Q. Well, and in fact you came into possession  
13 of the nonprosecution agreement sometime in 2008  
14 because Judge Marra ordered that, ordered the United  
15 States Government to turn over to all of the  
16 attorneys and the clients who were listed as alleged  
17 victims, correct?

18 A. Yes.

19 Q. So, you had possession of the N.P.A. as of  
20 sometime in the year 2008, correct?

21 A. Right.

22 Q. All right. And so you, and you were aware  
23 that under the nonprosecution agreement Mr. Epstein  
24 was required to meet certain requirements, that  
25 Mr. Epstein had a requirement to meet certain

1 Tommy Mottola was listed. Do you know who  
2 Mr. Mottola is?

3 A. Generally I think I know who that is.

4 Q. Who did you understand Mr. Mottola was?

5 A. Something to do with the music industry.

6 Q. All right. And the name David Copperfield  
7 was also referenced as a potential witness in the  
8 case, correct?

9 A. That is correct.

10 Q. All right. And did you -- and you, in  
11 fact, attempted to coordinate a deposition for  
12 Mr. Copperfield; is that correct?

13 MR. SCAROLA: Are you asking about whether  
14 communications occurred with you --

15 MR. CRITTON: Sure.

16 MR. SCAROLA: -- regarding such a  
17 deposition.

18 BY MR. CRITTON:

19 Q. Let me rephrase it. With regard to the  
20 lawyers in the case, including myself, you attempted  
21 to coordinate a time for completing or taking the  
22 deposition of Mr. Copperfield, Mr. Mottola, who I  
23 will represent is the former president of Sony  
24 Records, former president Bill Clinton, Alan  
25 Dershowitz, Donald Trump, and Leslie Wexner, true?

1 standards or certain provisions of the agreement  
2 otherwise the U.S.A. could potentially declare there  
3 was a breach of the agreement, true?

4 A. I suppose.

5 Q. Well, you're a former prosecutors too, so  
6 you knew what a nonprosecution agreement was, true?

7 A. No, I had never seen a nonprosecution  
8 agreement in my life before this one.

9 Q. When you got the nonprosecution agreement,  
10 you reviewed it?

11 A. Yes, I did.

12 Q. So, you were familiar with?

13 A. Right.

14 Q. And you understood from at least looking  
15 at the police report that you had access to, that  
16 Mr. Dershowitz had represented Mr. Epstein with  
17 regard to negotiating his plea that ultimately was  
18 reached in negotiations with the federal government,  
19 true?

20 A. I knew he played a role.

21 Q. Now, with regard to Mr., with regard to  
22 the depositions of -- well, let me strike that.  
23 Also listed both on your, on Jane Doe's and L.W.'s  
24 and E.W.'s updated interrogatory answers which were  
25 provided during the year 2009, an individual named

1 A. False.

2 Q. Which of those, as to which one of those  
3 is that false?

4 A. Tommy Mottola.

5 Q. So, but you did attempt to coordinate the  
6 depositions of Donald Trump, Mr. Dershowitz former  
7 president Clinton, David Copperfield, and Leslie  
8 Wexner, correct?

9 A. I believe so.

10 Q. And with regard to Mr., well, let me  
11 strike that. In setting these depositions; that is,  
12 in requesting these deposition be taken sometime in  
13 June and July of 2009 or requesting dates for them,  
14 did you have discussions with other attorneys in  
15 your firm as to the benefits that would exist in  
16 your case, your three cases against Mr. Epstein by  
17 taking these individuals' depositions?

18 MR. SCAROLA: Objection. Same as grounds  
19 previously stated; instruct you not to answer.

20 BY MR. CRITTON:

21 Q. Mr. Edwards, were you involved in the  
22 discussions regarding the deposing of any of the  
23 people of these individuals, Mr. Trump; that is, in  
24 discussions with any other lawyers in your firm  
25 including Scott Rothstein?

1 MR. SCAROLA: Same objection, same  
2 instruction.  
3 BY MR. CRITTON:  
4 Q. Same question with regard to  
5 Mr. Dershowitz, former president Clinton, Tommy  
6 Mottola, David Copperfield, and Leslie Wexner.  
7 THE WITNESS: No.  
8 MR. SCAROLA: Same objection, same  
9 instruction?  
10 THE WITNESS: And with respect to Tommy  
11 Mottola, I, that was not my firm that was a  
12 separate law firm that intended to take his  
13 deposition.  
14 BY MR. CRITTON:  
15 Q. Who was it that you understood was taking  
16 Mr. Mottola's deposition?  
17 A. Searcy, Denney.  
18 Q. Did you ever discuss with Mr. Rothstein or  
19 anyone on his behalf the value of taking the  
20 depositions of Trump, Dershowitz, former president  
21 Clinton, David Copperfield, and Leslie Wexner as an  
22 inducement to get Mr. Epstein to settle his  
23 lawsuits?  
24 MR. SCAROLA: You have already inquired of  
25 Mr. Edwards about the communications that he

1 BY MR. CRITTON:  
2 Q. First, my question in the broad sense.  
3 Were you involved in the decision to pursue flight  
4 data associated with any planes purportedly own by  
5 Mr. Epstein?  
6 MR. SCAROLA: My objection --  
7 MR. CRITTON: In terms of the discussions  
8 within your firm.  
9 MR. SCAROLA: My objection and my  
10 instruction stands.  
11 BY MR. CRITTON:  
12 Q. Did you have discussions within your firm  
13 with regard to taking the depositions of celebrities  
14 or famous people who were on, purportedly on  
15 Mr. Epstein's planes so that they could be deposed  
16 such that that would be an inducement to Mr. Epstein  
17 to settle his lawsuit?  
18 MR. SCAROLA: Same objection, same  
19 instruction.  
20 BY MR. CRITTON:  
21 Q. Isn't it true, Mr. Edwards, that in taking  
22 the deposition or in attempting to take the  
23 deposition of Donald Trump, you had no information  
24 that Mr. Trump had any knowledge of any female  
25 having; that is, underage female ever having been on

1 had with Mr. Epstein. He has responded to  
2 those questions previously. So, any further  
3 questioning along those lines is entirely  
4 repetitious.  
5 BY MR. CRITTON:  
6 Q. Can you answer that question, sir? Would  
7 you like it read back?  
8 MR. SCAROLA: Beyond what he has already  
9 responded, we would object on the basis of  
10 work-product and attorney-client privilege and  
11 I instruct you not to answer.  
12 THE WITNESS: Okay.  
13 BY MR. CRITTON:  
14 Q. Were you involved in any of the decision  
15 to pursue obtaining flight data from Mr. Epstein?  
16 Well, let me strike that. Were you involved in the  
17 decision to pursue flight data associated with any  
18 planes that were purportedly owned by Mr. Epstein?  
19 MR. SCAROLA: I will allow Mr. Edwards to  
20 acknowledge whether he did or did not  
21 communicate about such matters with opposing  
22 counsel. But beyond that I would assert  
23 attorney-client and work-product privileges and  
24 instruct you not to answer.

1 Mr. Epstein's plane and been, and having been  
2 assaulted by him?  
3 MR. SCAROLA: What Mr. Edwards knew or  
4 didn't know in connection with this prosecution  
5 of pending claims is protected by a privilege.  
6 I instruct him not to answer.  
7 BY MR. CRITTON:  
8 Q. Mr. Edwards, did you know Officer Recarey?  
9 I mean, I know you have meet him now because you  
10 have seen him at his deposition, correct?  
11 A. Correct.  
12 Q. Did you ever meet with, did you ever meet  
13 Mr. or Officer Recarey at any time prior to his  
14 deposition in person?  
15 A. No.  
16 Q. Have you ever spoken with Officer Recarey  
17 at any time prior to his deposition, by phone or  
18 otherwise?  
19 A. Yes.  
20 Q. Okay. And what context were you speaking  
21 with Officer Recarey?  
22 THE WITNESS: Answer?  
23 BY MR. CRITTON:  
24 Q. Well, first of all, let me withdraw that  
25 question. Excuse me. On how many occasions have

1 you spoken with Officer Recarey prior to his  
 2 deposition?  
 3 A. One time.  
 4 Q. And when was that?  
 5 A. 2008.  
 6 Q. What was the purpose of the -- let me  
 7 strike that. Did you initiate the conversation or  
 8 did he?  
 9 THE WITNESS: Answer?  
 10 MR. SCAROLA: You can answer that.  
 11 THE WITNESS: I did.  
 12 BY MR. CRITTON:  
 13 Q. Okay. What was the purpose of your  
 14 conversation?  
 15 MR. SCAROLA: To the extent that the  
 16 purpose of your conversation was unrelated to  
 17 any pending legal matter, including in  
 18 particular the claims against Mr. Epstein, you  
 19 may answer. To the extent that it had anything  
 20 at all to do with Mr. Epstein, you should not  
 21 respond on the basis of privilege.  
 22 THE WITNESS: Privilege.  
 23 BY MR. CRITTON:  
 24 Q. Did you ever speak with Chief Reiter at  
 25 any time -- well, let me strike that. You were not

1 proceeding relating to any matter during the year  
 2 2008 or 2009?  
 3 MR. SCAROLA: You may answer.  
 4 THE WITNESS: No.  
 5 BY MR. CRITTON:  
 6 Q. Did Jane Doe ever come -- let me strike  
 7 that. Did Jane Doe ever come to your firm, the RRA  
 8 firm for any reason?  
 9 A. Yes.  
 10 Q. On how many occasions did she come to your  
 11 firm, to RRA?  
 12 A. I believe one time.  
 13 Q. In addition to, I assume you met with her  
 14 on that occasion?  
 15 A. Right.  
 16 Q. Was anyone else present?  
 17 A. I don't believe so.  
 18 Q. Did L.M. ever come to your firm at RRA?  
 19 A. No.  
 20 Q. Did E.W. ever come to your firm at RRA?  
 21 A. Yes.  
 22 Q. On how many occasions?  
 23 A. One time.  
 24 Q. Did anyone meet with her other than  
 25 yourself?

1 at his deposition, were you?  
 2 A. No.  
 3 Q. Okay. Have you ever spoken with Chief  
 4 Reiter at any time for any purpose as it relates to  
 5 Mr. Epstein?  
 6 THE WITNESS: Answer?  
 7 MR. SCAROLA: Only to the extent that --  
 8 well, you asked specifically whether the  
 9 conversation related to Epstein?  
 10 THE WITNESS: Did the conversation occur  
 11 is the question.  
 12 MR. SCAROLA: Relating to Epstein. Read  
 13 the question back if you would, please.  
 14 MR. CRITTON: Let me rephrase it.  
 15 MR. SCAROLA: Okay.  
 16 BY MR. CRITTON:  
 17 Q. With regard to Chief Reiter, have you ever  
 18 spoken with Chief Reiter or now former Chief Reiter  
 19 from the Palm Beach Police Department for any  
 20 reason?  
 21 MR. SCAROLA: You can answer the "for any  
 22 reason" part.  
 23 THE WITNESS: No.  
 24 BY MR. CRITTON:  
 25 Q. Have you ever testified in a grand jury

1 A. Yes.  
 2 Q. Who was present?  
 3 A. Bill Berger.  
 4 Q. Did any RRA lawyer ever have an occasion  
 5 to meet with Jane Doe at, at a location other than  
 6 your office; that is, did you ever request that some  
 7 other lawyer meet with her, Jane Doe, for a specific  
 8 reason? Don't want to know the reason just whether  
 9 another lawyer met with her.  
 10 A. No.  
 11 Q. Did any other RRA lawyer meet with L.M.  
 12 separate, at any time?  
 13 A. No.  
 14 Q. Did any other lawyer ever met with E.W.  
 15 separate and apart from the one meeting that you had  
 16 with Bill Berger and yourself in 2000 -- I'm sorry  
 17 did --  
 18 A. We're talking always about the time period at  
 19 RRA. I understand that.  
 20 Q. Correct. Did any lawyer from RRA ever  
 21 meet with E.W. separate from the single occasion  
 22 that you and Mr. Berger met with her at RRA's  
 23 office?  
 24 A. No.  
 25 Q. Did, did you ever have any type of

1 communication, and by that I mean either a  
 2 conversation or any writing with Mr. Scott Rothstein  
 3 about the value of the J -- of the Jeffrey Epstein  
 4 cases?

5 MR. SCAROLA: You can answer yes or no.  
 6

7 THE WITNESS: No.

8 BY MR. CRITTON:

9 Q. Did you ever have a conversation or  
 10 communication where Scott Rothstein was present and  
 11 the value of the Epstein cases was discussed?

12 A. No.

13 Q. Did you ever have a conversation with  
 14 other attorneys at RRA regarding the value of the J,  
 15 of the Epstein cases that you had?

16 A. Yes.

17 Q. Okay. With whom?

18 A. Russell Adler, Bill Berger. I believe that's  
 19 it.

20 Q. From, from your observations when you were  
 21 at RRA, did it appear that certain individuals had  
 22 access to Mr. Rothstein; that is, other lawyers in  
 23 the firm had access to him?

24 A. It appeared to me like nobody had access to  
 25 him.

Q. In the particular instance that you got

1 not, just did you just not have an understanding?

2 A. I had an understanding.

3 Q. Okay. What was your understanding and  
 4 what was it based on?

5 A. Based on numerous conversations with Russell  
 6 Adler that even he had a very difficult time gaining  
 7 access to Scott Rothstein for any reason.

8 Q. Did Mr. Adler, did you ever ask Mr. Adler  
 9 to pass on information to Mr. Rothstein about the  
 10 Epstein cases?

11 A. No.

12 Q. Other than Mr. Jenne who would make, I  
 13 think you indicated earlier, on eight to ten  
 14 occasions ask you about the Rothstein, I am sorry,  
 15 asked you about the Epstein cases, did any other  
 16 person inquire on a somewhat regular basis or even  
 17 an irregular basis as to the status of the Epstein  
 18 cases?

19 A. Yes.

20 Q. Who?

21 MR. SCAROLA: Again I assume you're  
 22 talking about persons within the firm?

23 MR. CRITTON: Correct. I'm back to only  
 24 within RRA. You understood that, didn't you,  
 25 Mr. Edwards?

1 called up to his office, Mr. Adler was present along  
 2 with Mr. Rothstein and either Mr. Nurik or somebody  
 3 else who was on the phone, correct? We already  
 4 established that?

5 A. Correct.

6 Q. From your observations and or your  
 7 conversations with Mr. Adler, did you get the  
 8 impression that Mr. Adler could have or would have  
 9 access to Mr. Rothstein?

10 MR. SCAROLA: By that I assume you mean  
 11 unfettered access?

12 MR. CRITTON: No, just easy access.

13 Unfettered suggests someone can walk in and out  
 14 of the office and you already told me it was a  
 15 compound. Let me reask my question.

16 BY MR. CRITTON:

17 Q. From what Mr. Adler told you, if you had a  
 18 conversation with Mr. Adler about a particular,  
 19 whether it was an Epstein case or another case, was  
 20 it your understanding that Mr. Adler had regular,  
 21 some form of regular communication with  
 22 Mr. Rothstein?

23 A. No.

24 Q. Okay. Did you understand that he didn't  
 25 have any communication with Mr. Rothstein or did you

1 THE WITNESS: No, I didn't. I thought you  
 2 meant anybody.

3 BY MR. CRITTON:

4 Q. Okay. Then I am back within RRA because I  
 5 had asked you about Mr. Jenne.

6 A. Got it.

7 Q. So, I wouldn't go out. I want to stay  
 8 within the firm. Did anyone ask you or inquire of  
 9 you about the status of the RRA cases; it was either  
 10 a lawyer or an investigator within the firm?

11 A. Maybe but, but none that I can really picture  
 12 as somebody who would do it regularly. If I was talking  
 13 in some lawyer's office about any case or any issue,  
 14 there were times where I remember generally how is this  
 15 specific case going or that specific case, and at times  
 16 it was Jeffrey Epstein case.

17 Q. With regard to Mr. Jenne, what did you  
 18 understand with regard to what his position was in  
 19 the firm?

20 A. Something to do with the investigative  
 21 department.

22 Q. Okay. What did you understand about  
 23 Mr. Jenne's background. Let me strike that. Were  
 24 you a State Attorney's when Mr. Jenne was a Broward  
 25 County Sheriff?

1 A. I believe so.  
 2 Q. Were you still a State Attorney when  
 3 Mr. Jenne was indicted and then eventually ended up  
 4 in jail?  
 5 A. No.  
 6 Q. Were you in private practice at that  
 7 point?  
 8 A. Correct.  
 9 Q. But you lived then in Broward County, so  
 10 you followed the developments of Mr. Jenne's  
 11 downfall in becoming a convicted felon?  
 12 A. I was aware.  
 13 Q. All right. Was Mr. Jenne, would it be a  
 14 correct statement that Mr. Jenne and Mr. Fisten and  
 15 Mr. Roberts were all at the RRA firm when you  
 16 started in April of '09?  
 17 A. I don't believe so.  
 18 Q. Which one was there when you started?  
 19 When I say "there," was already employed by RRA when  
 20 you started?  
 21 A. I am not sure if any of the three were there  
 22 but perhaps all of them were there.  
 23 Q. All you know is at some point you came to  
 24 be involved with them as investigators?  
 25 A. Correct.

1 A. No.  
 2 Q. Did you ever find it strange that  
 3 Mr. Jenne was asking you questions about the Epstein  
 4 cases?  
 5 A. No.  
 6 Q. Did you ever ask Russell Adler as to why  
 7 Mr. Jenne would be asking you questions about the  
 8 Epstein cases?  
 9 A. No.  
 10 Q. And I think you told me earlier, but I may  
 11 be wrong so I want to clear this up. I don't want  
 12 to be repetitious here. Did Mr. --  
 13 MR. SCAROLA: When did you change your  
 14 mind about that?  
 15 MR. CRITTON: Earlier.  
 16 BY MR. CRITTON:  
 17 Q. Did Mr. Jenne, did you ever direct  
 18 Mr. Jenne to do any investigation on the Epstein  
 19 cases?  
 20 MR. SCAROLA: Objection, work-product.  
 21 BY MR. CRITTON:  
 22 Q. Did Mr. Jenne ever do any investigation on  
 23 the Epstein files?  
 24 MR. SCAROLA: Objection, work-product.  
 25

1 Q. All right. With regard to Mr. Jenne, was  
 2 his office on the same floor as yours?  
 3 A. No.  
 4 Q. Where, was his office in any way near  
 5 Mr. Rothstein's?  
 6 MR. SCAROLA: What does any way near Mr.  
 7 Rothstein's mean?  
 8 MR. CRITTON: Same floor.  
 9 THE WITNESS: No.  
 10 BY MR. CRITTON:  
 11 Q. Did it appear to you that -- well, let me  
 12 strike that. You said that Mr. Jenne had something  
 13 to do with investigation, correct?  
 14 A. Correct.  
 15 Q. Okay. Did he ever describe for you what  
 16 he did for the firm?  
 17 A. No.  
 18 Q. And I think you said, did you say what his  
 19 title was?  
 20 A. I didn't know his title. I don't know what  
 21 his title is now.  
 22 Q. Did you ever ask Mr. Jenne why he was  
 23 asking you questions about the Epstein case or  
 24 engaging you in a dialogue regarding the Epstein  
 25 cases?

1 BY MR. CRITTON:  
 2 Q. Did Mr., were you aware that Mr. Jenne was  
 3 attempting to shop the Epstein cases to investors  
 4 during the time you were at the RRA firm?  
 5 MR. SCAROLA: Objection, assumes facts.  
 6 THE WITNESS: No.  
 7 MR. SCAROLA: That's all right.  
 8 BY MR. CRITTON:  
 9 Q. Do you know Bill Scherer, Attorney Bill  
 10 Scherer?  
 11 A. No, I know of him.  
 12 Q. You are aware that he has a pending  
 13 lawsuit against various individuals including TD  
 14 Bank and other Defendants on behalf of various  
 15 investors; is that a fair statement?  
 16 A. I remember when that first came out. I have  
 17 not followed it. I don't know if it's active, if it's  
 18 still pending, or what the status is at all. But I do  
 19 remember a lawsuit being filed on behalf of somebody  
 20 against Scott Rothstein and others.  
 21 Q. All right. And do you remember, it's  
 22 within Paragraph 20 of the complaint it's a --  
 23 A. Of?  
 24 Q. Of, I'm sorry, of Exhibit No. 2. And it  
 25 states Fort Lauderdale attorney William Scherer

1 represents multiple Rothstein related investors. He  
 2 indicated in an article that RRA, slash, Rothstein  
 3 had used the Epstein ploy as a showpiece, as a  
 4 showpiece, as bait. That's, and the quote is,  
 5 Epstein ploy, as a showpiece, as bait. That's the  
 6 way he raised all the money.

7 He would use cases as bait for luring  
 8 investors into fictional cases. All the cases he  
 9 allegedly structured were fictional. I don't  
 10 believe there was a real one there.

11 Okay. If I asked you to assume that that  
 12 quote is accurate from Mr. Scherer, would it be a  
 13 correct, would it be a correct statement -- well,  
 14 let me strike that.

15 Were you aware that Rothstein and other  
 16 individuals were using the Epstein ploy; that is,  
 17 the Epstein cases in order to, as bait in order to  
 18 raise money for, for the firm and Mr. Rothstein?

19 MR. SCAROLA: I am going to object to the  
 20 form of the question, but you can certainly  
 21 answer it.

22 THE WITNESS: Okay. I am going to answer  
 23 it to the extent that I understand it. No, I  
 24 was not aware that the Epstein cases were being  
 25 used as a showpiece, as bait. But you are also

1 A. No.

2 Q. Okay. Were you aware that Scott Rothstein  
 3 had represented to other individuals that he had  
 4 multiple other cases, multiple other Jane Doe's  
 5 which he was trying to market to investors?

6 A. No.

7 Q. Were you aware that -- do you have any  
 8 knowledge that Ken -- let me strike that.

9 Were you aware that Ken Jenne was  
 10 attempting to market or shop non-existent Epstein  
 11 cases to investors?

12 A. I wasn't aware then nor am I aware of that  
 13 now, so, no.

14 Q. Do you have any knowledge that Mr. Fisten  
 15 and/or Mr. Jenne would cart boxes of Epstein related  
 16 materials; that is, existing Epstein related  
 17 materials relating to Jane Doe and show those to  
 18 other investors?

19 A. Do I have knowledge that somebody carted?

20 Q. Yeah, are you aware that Mr. Fisten or do  
 21 you have any knowledge that Mr. Fisten brought boxes  
 22 of Epstein-related materials to show perspective  
 23 investors?

24 A. No.

25 MR. SCAROLA: Objection, assumes, Assumes

1 asked me to assume that the statement that you  
 2 have injected as Paragraph 20 of the complaint  
 3 is true and it begins with, or ends with I  
 4 don't believe there was a real one in there,  
 5 talks, speaking as to all the cases. And you  
 6 know and I know that that statement is  
 7 absolutely false in that you know each and  
 8 every one of the claims that have been asserted  
 9 against Mr. Epstein related to his molestation  
 10 of children, they are all true including the  
 11 three that I have against Mr. Epstein.

12 So, if you're asking me to assume that  
 13 this is it true, no, I did not know that they  
 14 were being used for anything.

15 BY MR. CRITTON:

16 Q. Okay. Well, as to whether Mr. Scherer was  
 17 aware as to whether there were three pending cases  
 18 or he assumed that they were all just made-up cases,  
 19 neither you nor I know what he was thinking,  
 20 correct?

21 A. Yeah, I don't know.

22 Q. All right. With regard to the Epstein  
 23 ploy, with regard to Epstein cases, were you aware  
 24 that Scott Rothstein was trying to market Epstein  
 25 cases; that is, three, three cases that existed?

1 facts not in evidence, no proper predicate.  
 2 BY MR. CRITTON:

3 Q. Do you have any knowledge that Mr. Jenne  
 4 either directly or directed someone else to bring  
 5 boxes of Epstein-related materials to show  
 6 investors?

7 MR. SCAROLA: Objection, assumes facts not  
 8 in evidence, no proper predicate.

9 THE WITNESS: No.

10 BY MR. CRITTON:

11 Q. If, based on your earlier testimony, if  
 12 there were boxes of Epstein materials on existing  
 13 cases, Jane Doe, L.M. and E.W., again if I  
 14 understood your testimony, that information would  
 15 have been available somewhere in the firm and  
 16 someone who had access to the room could have  
 17 grabbed those files or taken those files and done  
 18 whatever they wanted to them, with them, and then  
 19 brought them back for storage, correct, and you  
 20 wouldn't know?

21 A. As is the case with every case in every law  
 22 firm in America, yes.

23 Q. With regard to the three cases that you  
 24 have now, does any law firm other than your current  
 25 firm, which is Farmer, Jaffe?

1 A. Weissing.  
 2 Q. Or RRA, Mr. Howell, or Mr. Cassell have  
 3 any interest in those cases?  
 4 A. No.  
 5 Q. At any time -- let me strike that. You  
 6 are aware that Mr. Alfredo Garcia has pled guilty to  
 7 an obstruction of justice charge based on the news?  
 8 A. I don't know Alfredo Garcia at all.  
 9 Q. Sorry about that. The head of Alfredo  
 10 Garcia. With regard Mr. Rodriguez, Alfredo  
 11 Rodriguez, are you aware through news reports that  
 12 he pled guilty to obstruction of justice?  
 13 A. Yes.  
 14 Q. At any time have you been given access to  
 15 the pamphlet book and/or any of the yellow pages  
 16 that have been referenced in the criminal  
 17 indictment?  
 18 MR. SCAROLA: I am going to instruct you  
 19 not answer that question on the basis of  
 20 attorney-client and work-product privilege.  
 21 BY MR. CRITTON:  
 22 Q. Has the, have you been, have you had any  
 23 contact with the criminal defense lawyer for  
 24 Mr. Rodriguez?  
 25 MR. SCAROLA: You can answer yes or no.

1 THE WITNESS: No.  
 2 BY MR. CRITTON:  
 3 Q. Have you had any communication, not a  
 4 conversation but any communication with the criminal  
 5 defense lawyer about obtaining a copy of the  
 6 pamphlet and/or the pamphlet book or the yellow  
 7 pages that are referenced in the criminal indictment  
 8 that were at one time in the possession of Mr.  
 9 Rodriguez and that he apparently was trying to sell  
 10 to the cooperating witness?  
 11 MR. SCAROLA: I am going to instruct you  
 12 not to answer any question about anything that  
 13 you may have done in connection with the  
 14 fulfillment of your responsibilities as counsel  
 15 for the Plaintiffs in the three pending cases.  
 16 BY MR. CRITTON:  
 17 Q. Again, of course you're going to continue  
 18 to follow Mr. Scarola's direction?  
 19 A. On what I have done or what I have not done,  
 20 all of that is work-product.  
 21 Q. Well, you have filed a motion to obtain a  
 22 copy of the pamphlet book and the yellow pages of  
 23 Mr. Rodriguez, correct? I am sorry, either a  
 24 motion -- well, strike that. You have filed a  
 25 motion in federal court to obtain a copy of the, of

1 the information that is held by the FBI which would  
 2 include the pamphlet and the yellow, the pamphlet  
 3 and the yellow pages, true?

4 A. I have. Adam Horowitz has, and I may or may  
 5 not have piggybacked his motion. But as sitting here  
 6 right now, I, I don't remember drafting that motion.

7 Q. Are you sure he hasn't piggybacked your  
 8 motion?

9 A. I'm not sure. If you show me my motion, I can  
 10 tell you whether I drafted it or not.

11 Q. Have you --

12 A. That, that was certainly an idea.

13 Q. Have, have you also -- you have also  
 14 served a motion to obtain FBI files that relate to  
 15 Mr. Epstein; is that correct?

16 A. Correct.

17 Q. Okay. Have you spoken as a result of the  
 18 motion that you filed, has the government, have you  
 19 spoken with the United States Attorney's Office or  
 20 representatives for the FBI with regard to the  
 21 motion which you filed?

22 MR. SCAROLA: Objection, privilege and  
 23 instruct you not to answer.

24 BY MR. CRITTON:

25 Q. Have you received any type of response

1 from the United States Attorney's Office or the FBI  
 2 with regard to the motion that you have filed?

3 MR. SCAROLA: You may answer that only  
 4 with respect to those matters that are matters  
 5 of public record; that is, if a response has  
 6 been filed with the court or provided to you in  
 7 the form of a pleading, you may respond.

8 THE WITNESS: I cannot respond to that  
 9 question.

10 MR. CRITTON: All right. We're going to  
 11 quit at 5. I don't want to go on.

12 MR. SCAROLA: You already, you already  
 13 missed that.

14 MR. CRITTON: All right. Well, let's,  
 15 I'll adjourn the deposition today, and I will  
 16 arrange with you for a time to finish.

17 MR. SCAROLA: Well, so that the record is  
 18 clear, it is our position that you have had  
 19 more than adequate time to conduct an  
 20 appropriate examination of Mr. Edwards, and we  
 21 will resist any further effort to depose him.

22 MR. CRITTON: I understand your position.  
 23 Disagree with it but understand it.

24 MR. SCAROLA: Thank you.

25 THE VIDEOGRAPHER: This concludes today's

1 videotape deposition of Scott Rothstein. The  
2 time is --

3 THE WITNESS: Whoa, whoa.

4 THE COURT REPORTER: Yes. Bradley  
5 Edwards.

6 THE WITNESS: Please don't lump me in with  
7 that guy, man.

8 MR. SCAROLA: This concludes the  
9 deposition of Mr. Bradley Edwards.

10 THE VIDEOGRAPHER: Oh, I'm sorry. This  
11 concludes the deposition of Mr. Bradley  
12 Edwards. The time is 5:07 p.m.

13 (A discussion was held off the record.)

14 THE COURT REPORTER: Did you want to order  
15 this?

16 MR. CRITTON: Ask me tomorrow.

17 MR. SCAROLA: I will take a copy of it.  
18 Let's stay on the record. We don't need to be  
19 on the video record but I want to make the  
20 statement that we would consider it entirely  
21 inappropriate for any portion of this  
22 deposition to be used for any reason whatsoever  
23 that is not directly connected with the  
24 prosecution of the pending claim against  
25 Mr. Edwards or the defense of the

1 CERTIFICATE OF OATH  
2 THE STATE OF FLORIDA  
3 COUNTY OF PALM BEACH

4  
5  
6 I, the undersigned authority, certify that  
7 BRADLEY J. EDWARDS, ESQUIRE personally appeared  
8 before me and was duly sworn on the 23rd day of  
9 March, 2010.

10 Dated this 5th day of April, 2010.

11 *Cynthia J. Hopkins*

12  
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15  
16 Cynthia Hopkins, RPR, FPR  
17 Notary Public - State of Florida  
18 My Commission Expires: February 25, 2011  
19 My Commission No.: DD 643788  
20  
21  
22  
23  
24  
25

1 counterclaims. Thank you.

2 MR. CRITTON: Bye.

3 MR. SCAROLA: Bye.

4 (Witness excused.)

5 (Deposition was concluded.)

1 CERTIFICATE  
2 THE STATE OF FLORIDA  
3 COUNTY OF PALM BEACH

4 I, Cynthia Hopkins, Registered Professional  
5 Reporter, Florida Professional Reporter and Notary  
6 Public in and for the State of Florida at large, do  
7 hereby certify that I was authorized to and did  
8 report said deposition in stenotype; and that the  
9 foregoing pages are a true and correct transcription  
10 of my shorthand notes of said deposition.

11 I further certify that said deposition was  
12 taken at the time and place hereinabove set forth  
13 and that the taking of said deposition was commenced  
14 and completed as hereinabove set out.

15 I further certify that I am not attorney or  
16 counsel of any of the parties, nor am I a relative  
17 or employee of any attorney or counsel of party  
18 connected with the action, nor am I financially  
19 interested in the action.

20 The foregoing certification of this transcript  
21 does not apply to any reproduction of the same by  
22 any means unless under the direct control and/or  
23 direction of the certifying reporter.

24 Dated this 5th day of April, 2010.

25 *Cynthia J. Hopkins*  
Cynthia Hopkins, RPR, FPR

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41 (Pages 308 to 311)

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1 DATE: April 5th, 2010  
 2 TO: BRADLEY J. EDWARDS, ESQUIRE  
 3 c/o Jack Scarola, Esquire  
 4 SEARCY, DENNEY, SCAROLA,  
 5 BARNHART & SHIPLEY, P.A.  
 6 2139 Palm Beach Lakes Boulevard  
 7 West Palm Beach, Florida 33409

8 IN RE: Epstein vs. Rothstein

9 CASE NO.: 50 2009CA040800X/XXMB AG

10 Please take notice that on Tuesday, the 23rd of  
 11 March, 2010, you gave your deposition in the  
 12 above-referred matter. At that time, you did not  
 13 waive signature. It is now necessary that you sign  
 14 your deposition.

15 As previously agreed to, the transcript will be  
 16 furnished to you through your counsel. Please read  
 17 the following instructions carefully:

18 At the end of the transcript you will find an  
 19 errata sheet. As you read your deposition, any  
 20 changes or corrections that you wish to make should  
 21 be noted on the errata sheet, citing page and line  
 22 number of said change. DO NOT write on the  
 23 transcript itself. Once you have read the  
 24 transcript and noted any changes, be sure to sign  
 25 and date the errata sheet and return these pages to  
 me.

26 If you do not read and sign the deposition  
 27 within a reasonable time, the original, which has  
 28 already been forwarded to the ordering attorney, may  
 29 be filed with the Clerk of the Court. If you wish  
 30 to waive your signature, sign your name in the blank  
 31 at the bottom of this letter and return it to us.

32 Very truly yours,  
 33 *Cynthia J. Hopkins*

34 Cynthia Hopkins, RPR, FPR

35 I do hereby waive my signature.

36 BRADLEY J. EDWARDS, ESQUIRE

1 ERRATA SHEET  
 2 IN RE: EPSTEIN VS. ROTHSTEIN  
 3 CR: Cynthia Hopkins, RPR, FPR  
 4 DEPOSITION OF: BRADLEY J. EDWARDS, ESQUIRE  
 5 TAKEN: March 23, 2010  
 6 JOB NO.: 1333  
 7 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE  
 8 PAGE # LINE # CHANGE  
 9 REASON  
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Please forward the original signed errata sheet to  
 this office so that copies may be distributed to all  
 parties.

Under penalty of perjury, I declare that I have read  
 my deposition and that it is true and correct  
 subject to any changes in form or substance entered  
 here.

DATE: \_\_\_\_\_

SIGNATURE OF  
 DEPONENT: \_\_\_\_\_

1 CERTIFICATE  
 2  
 3

4 THE STATE OF FLORIDA  
 5 COUNTY OF PALM BEACH

6 I hereby certify that I have read the foregoing  
 7 deposition by me given, and that the statements  
 8 contained herein are true and correct to the best of  
 9 my knowledge and belief, with the exception of any  
 10 corrections or notations made on the errata sheet,  
 11 if one was executed.

12 Dated this \_\_\_\_\_ day of \_\_\_\_\_,  
 13 2010.

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 19 BRADLEY J. EDWARDS, ESQUIRE  
 20 Job #1333  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION

In re:

Case No. 09-34791-BKC-RBR  
Chapter 11

ROTHSTEIN ROSENFELDT ADLER, P.A.,

Debtor.

RULE 2004 EXAMINATION OF  
SCOTT W. ROTHSTEIN

Taken on behalf of the Chapter 11 Trustee

DATE TAKEN: December 12, 2011

TIME: 8:30 a.m. - 12:04 p.m.

PLACE: James Lawrence King Federal  
Justice Building  
99 N.E. Fourth Street  
Courtroom 11-3  
Miami, Florida 33128

Examination of the witness taken before:  
Michele L. Savoy, Registered Professional Reporter  
United Reporting, Inc.  
1218 S.E. Third Avenue  
Fort Lauderdale, Florida 33316  
(954) 525-2221

United Reporting, Inc.  
(954) 525-2221

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EXHIBIT D

1 the Ponzi scheme, and then, second, so we can do  
2 this quicker, if they knew of the Ponzi scheme, even  
3 though they may not have known what was going on.

4 A Let me just -- you got to clarify. I  
5 don't mean to be a pain in the butt on this, but you  
6 have to clarify Ponzi scheme for me. Because,  
7 again, you have multiple levels of criminal activity  
8 in the law firm that you may not think was related  
9 to the Ponzi scheme, but which you'll see on further  
10 investigation was related to the Ponzi scheme.

11 So you want to know what my belief is as  
12 to whether or not they were involved at any level?

13 Q Well, how about if I change the question  
14 then and say that if they were involved in illegal  
15 activity at the firm.

16 A Fair enough.

17 Q Okay?

18 A Yes, sir.

19 Q We will go back and we'll talk about  
20 whether or not that any of these people knew and  
21 then, third, what they would have done had they  
22 known.

23 A Okay.

24 Q So first question is this pertains to  
25 lawyers that participated.

1                   **Lawrence Barks?**  
2                   A    No.  
3                   Q    **Bill Berger?**  
4                   A    No.  
5                   Q    **Riley Cirulnick?**  
6                   A    No.  
7                   Q    **Jodi Cohen?**  
8                   A    No.  
9                   Q    **Pedro Dijols?**  
10                  A    No.  
11                  Q    **Ben Dishowitz?**  
12                  A    No.  
13                  Q    **Brad Edwards?**  
14                  A    No.  
15                  Q    **Gary Farmer?**  
16                  A    No.  
17                  Q    **Mark Fistos?**  
18                  A    No.  
19                  Q    **Julio Gonzalez?**  
20                  A    No.  
21                  Q    **Seth Lehrman?**  
22                  A    No.  
23                  Q    **Arthur Neiwirth?**  
24                  A    On the periphery, I believe he had some  
25                  knowledge of illegal activity just because of things

1 he was working on, but he was not directly involved.

2 Q Okay. You mention Mr. Nurik.

3 A Barry Stone?

4 Q No.

5 Q Osvaldo Torres?

6 Q No.

7 Q Weissing? Matthew Weissing?

8 Q No.

9 Q Richard Wolfe?

10 Q No.

11 Q So that's a fairly substantial number of  
12 lawyers that worked at the firm that didn't know  
13 about the Ponzi scheme.

14 A I mean, there was a whole section --

15 Q Of those involved, did any of those names  
16 that I just mentioned to you, excepting who you  
17 identified as being possibly Mr. Neiwirth, did they  
18 have any knowledge that you were involved in any  
19 illegal activity? Forget the term Ponzi scheme.

20 A To my knowledge, no.

21 Q Okay. Did you believe those were honest  
22 lawyers?

23 A For the most part, yes.

24 Q Okay. Each of them had obligations with  
25 respect to trust account maintenance under the rules

1 of the Florida Bar.

2 Do you know that, generally, because  
3 you're -- you were a Florida lawyer, right?

4 A Correct.

5 Q Did any of those lawyers know about the  
6 trust account defalcations that existed at the firm?

7 A Certain people had -- I believe had  
8 information to know, but to my knowledge as I sit  
9 here today, I don't know who knew out of these  
10 people that you just read to me. On those --

11 Q When you say -- can you tell me what you  
12 mean when you say they had information to know.

13 A Well, for example, with Mr. Neiwirth,  
14 there were times when we would ask for trust checks,  
15 and they were delayed for a significant period of  
16 time. As a lawyer, you know that there should be no  
17 delay in getting a trust check.

18 Irene Stay had a standing order, which I  
19 believe was it would take up to 30 days to get a  
20 trust check. And that was to facilitate moving the  
21 money in and out of the trust account.

22 Q So you're saying that it was a red flag,  
23 as an example, for Mr. Neiwirth?

24 A That's my opinion, yes.

25 Q Okay. You never had conversations with

1 him where you admitted to him that you were engaged  
2 in any illegal activity, did you?

3 A No.

4 Q Okay. With respect to the lawyers who  
5 were already identified as not being complicit in  
6 any of the crimes or having knowledge of it, do you  
7 have any understanding or belief as to, for  
8 instance, we'll take Mr. Berger. Had he learned of  
9 the illegal activity, what do you believe he would  
10 have done?

11 A I believe he would have reported it.

12 Q And how about with respect to trust  
13 account defalcations?

14 A I believe Bill Berger would have reported  
15 it.

16 Q Would Mr. Barski have reported it?

17 A Yes.

18 Q Illegal activity?

19 A I believe so.

20 Q Trust account defalcations?

21 A I believe so.

22 Q How about Mr. Cirulnick, would he have  
23 reported illegal activity?

24 A I don't know if he would have reported it.  
25 He would have gone to Lippman, and then how Lippman

1 would have reacted is your guess.

2 Q How about Jodi Cohen? Do you believe she  
3 would have reported it?

4 A She probably would have gone to Lippman  
5 also.

6 Q They both, meaning Cirulnick and Jodi,  
7 worked for Lippman?

8 A Yes.

9 Q Okay.

10 A And understand, that is just my judgment  
11 call, knowing them as I knew them.

12 I don't know that for certain.

13 You're asking me to speculate.

14 Q Pedro Dijols, if he knew of the illegal  
15 activity --

16 A He would have reported it.

17 Q And if he had learned of the trust account  
18 defalcations, he would have reported it?

19 A Yes.

20 Q How about Ben Dishowitz? Would he have  
21 reported illegal activity?

22 A Yes.

23 Q And same with respect to trust account  
24 issues?

25 A Yes.

1           Q    Brad Edwards, would he have reported  
2           illegal activity?

3           A    I don't know.

4           Q    Would he have reported trust account  
5           defalcations?

6           A    I don't know.

7           Q    How about Gary Farmer, would he have  
8           reported it?

9           A    Yes.

10          Q    Yes, as to both questions?

11          A    Yes.

12          Q    Mark Fistos?

13          A    Yes to both questions.

14          Q    Julio Gonzalez.

15          A    Yes, as to both.

16          Q    Seth Lehrman?

17          A    Probably.

18          Q    Mr. Nurik?

19          A    Absolutely.

20          MR. NURIK: I would have shot you.

21          A    Probably.

22          BY MR. LICHTMAN:

23          Q    Barry Stone?

24          A    Yes. Absolutely.

25          Q    Osvaldo Torres?

1 I yield to Mr. Lichtman at this time.

2 | Thank you.

## FURTHER EXAMINATION

4 BY MR. LICHTMAN:

5 Q I just have a few quick points.

6 | A Okay.

7           Q     Earlier in my discussion with you, you  
8     mentioned some of the lawyers at RRA who knew about  
9     or were complicit in varying degrees in the  
10    commission of the Ponzi scheme.

11 A In commission of illegal activity.

## 12 Q Illegal activity.

13 A Yes.

14 Q Yes.

15 You mentioned Mr. Adler.

16 A Yes.

17 Q What was Mr. Adler's role?

18 A Several.

19 Let me give you his key roles and see if  
20 they lead to other things.

21 Probably the most significant thing he did  
22 for us in helping perpetuate and really save the  
23 Ponzi from exploding was the New York hedge funds  
24 wanted to come down and do additional due diligence  
25 on our investment.

1           There were back and forth between me and  
2       the hedge funds and me and the Banyan people trying  
3       to facilitate the due diligence they wanted to do.

4           What ended up happening was Brian Jedwab,  
5       who was probably one of the more, I guess observant  
6       people in that group, decided it would be a good  
7       idea to give him -- and probably Gil Colter also,  
8       also in the category of more observant people within  
9       Murray Huberfeld's groups, decided that this -- the  
10      deal flow that we were saying existed was  
11      suspicious, highly unusual, possibly impossible,  
12      things of that nature is what we were hearing from  
13      up north and back to us. And we needed to put on a  
14      dog and pony show for them if this thing were going  
15      to survive. Because if we can't show the deal flow,  
16      one of two things is going to happen: Either  
17      they're just going to cut us off or they're going to  
18      cut us off and the thing is going to explode.

19           Obviously, we couldn't allow that to  
20      happen.

21           So initially what happened was they just  
22      wanted to talk to some of our referring groups. So  
23      I sent out an email to the entire firm -- I think it  
24      was the entire firm -- at least to the shareholders  
25      and partners. But it may have been to the all the

1 lawyers saying, We need people that refer us  
2 labor/employment cases to answer a couple of simple  
3 questions. And I think I outlined the questions and  
4 specifically said, These are the questions that are  
5 going to be asked: Do you refer us business --  
6 labor employment business, and are you happy?

7 Then it got to the point where they agreed  
8 to that. Then they disagreed to that. And it was  
9 clear that they wanted to come down. After a  
10 certain point in time, it became clear that the due  
11 diligence was going beyond that.

12 Before that, when I sent out the firm-wide  
13 email, I had gotten back a couple of people. Russ  
14 had sent me people and I think Stu sent me some  
15 people. Maybe a couple other people sent me --  
16 possible referring lawyers who would vouch for us.

17 When it got to the point that -- that then  
18 went by the wayside, because it became clear through  
19 speaking to Mr. Preve and speaking to Jack Simony,  
20 who was for lack of a better term one of our  
21 confidants, one of the people who we were closer to  
22 at the Murray Huberfeld group of hedge funds, that  
23 they wanted to do significant due diligence and  
24 actually meet with the people that were sending us  
25 cases, that, of course, was a huge problem for us

1 because no one was sending us cases.

2 I went to Russ and so -- and I don't  
3 recall going to Lippman. But to Russ and to Stu.  
4 And said, Listen: We need to get some people  
5 together. These guys want to come down. The hedge  
6 funds are going to cut us off. This will destroy  
7 us. We need to get some people together.

8 Russ jumped right into the breach and  
9 said, I got some people.

10 I said okay. Are these people you trust?

11 Yes.

12 All right. This is what we're going to  
13 need them to do, and I laid it out for him. I told  
14 him very specifically, We need them to say that they  
15 sent us in the hundreds of cases on a monthly basis  
16 and --

17 Q And that would have been an untrue  
18 statement, correct?

19 A Yeah. Everything that I'm telling you  
20 right now, we -- they needed to lie.

21 Okay.

22 Q And these are lawyers that you're alluding  
23 to?

24 A Yes.

25 Q Outside of the firm?

1           A    Yeah. I'll tell you who they are.

2           Q    Yes.

3           A    These people needed to lie to the hedge  
4           fund due diligence people to substantiate our deal  
5           flow.

6                   That's the conversation Russ and I had.  
7           We had to specifically say they sent us hundreds of  
8           cases, which would have been false.

9                   They needed to say that these cases were  
10           big dollar cases, in the millions of dollars, which  
11           was false.

12                   And they needed to say that we sent them  
13           huge dollar referral fees; also false.

14                   Huge dollars meaning hundreds of thousands  
15           if not million of dollars in referral fees.

16                   So there were three main false components.

17                   What Russ did to find the people, I don't  
18           know. I'm sure he had conversations with them  
19           because they needed to be instructed on which lies  
20           to tell and how to handle this.

21           Q    And indeed lawyers stepped into the role  
22           to perform for you and lie, correct?

23           A    Yes.

24                   What ended up happening was I got one  
25           legal -- legal group to do it, mutual friends of

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **09-60331**

CR-COHN  
MAGISTRATE JUDGE  
SELTZER

18 U.S.C. §1962(d)

18 U.S.C. §1956(h)

18 U.S.C. §1349

18 U.S.C. §1343

18 U.S.C. § 2

18 U.S.C. §1963

18 U.S.C. §982(a)(1)

18 U.S.C. §981(a)(1)(C)

UNITED STATES OF AMERICA,

Plaintiff,

v.

SCOTT W. ROTHSTEIN,

Defendant.

FILED by \_\_\_\_\_ D.C.

DEC 01 2009

STEVEN M. LARIMORE  
CLERK U. S. DIST. CT.  
S. D. of FLA. - FT. LAUD.

INFORMATION

The United States Attorney charges that, at all times relevant to this Information:

GENERAL ALLEGATIONS

1. Scott W. Rothstein was an attorney admitted to practice law in Florida. Defendant Rothstein was the Chief Executive Officer (CEO) and Chairman of Rothstein, Rosenfeldt and Adler, P.A.
2. Rothstein, Rosenfeldt and Adler, P.A. was a law firm with offices located at 401 East Las Olas Boulevard, Fort Lauderdale, Florida and elsewhere. The law firm employed approximately seventy (70) attorneys and engaged in the practice of law involving a wide range of specialties, including labor and employment law.

**COUNT 1**  
(Racketeering Conspiracy, 18 U.S.C. §1962(d))

1. The General Allegations of this Information are realleged and expressly incorporated herein as if set forth in full.

**THE ENTERPRISE**

2. The law firm, Rothstein, Rosenfeldt and Adler, P.A. (hereinafter referred to as RRA) was a legal entity organized under the laws of the State of Florida and constituted an Enterprise as that term is defined in Title 18, United States Code, Section 1961(4). The Enterprise engaged in, and the activities of which affected, interstate and foreign commerce.

**THE RACKETEERING CONSPIRACY**

3. From in or about 2005 and continuing through in or about November 2009, in the Southern District of Florida and elsewhere, the defendant,

**SCOTT W. ROTHSTEIN,**

being a person employed by and associated with the Enterprise described above, which was engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly combine, conspire, confederate, and agree, with persons known and unknown to the United States Attorney, to violate Title 18, United States Code, Section 1962(c); that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise through a pattern of racketeering activity as that term is defined in Title 18, United States Code, Sections 1961(1) and (5), as set forth herein below at paragraph 4.

## THE PATTERN OF RACKETEERING ACTIVITY

4. The pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), through which the defendant and his co-conspirators agreed to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise consisted of multiple acts indictable under the laws of the United States, namely:

- i. Title 18, United States Code, Section 1341 (mail fraud);
- ii. Title 18, United States Code, Section 1343 (wire fraud);
- iii. Title 18, United States Code, Section 1956(a)(1) (laundering of monetary instruments);
- iv. Title 18, United States Code, Section 1957 (engaging in monetary transactions); and
- v. Title 18, United States Code, Section 1956(h) (conspiracy to launder monetary instruments and engage in monetary transactions).

## THE PURPOSE AND OBJECT OF THE RACKETEERING ACTIVITY

5. The principal purpose of the racketeering conspiracy was to generate money for the defendant and his co-conspirators through the operation of the Enterprise and through various criminal activities, including mail fraud, wire fraud, and money laundering.

6. The defendant and his co-conspirators agreed to engage in a pattern of racketeering activity through its base of operation at the offices of RRA. The conspirators also utilized other locations to further the objectives of the Enterprise. RRA was utilized by the defendant and his co-conspirators to unlawfully obtain approximately \$1.2 billion from investors by fraud in connection with an investment scheme commonly known as a "Ponzi" scheme, in which new investors' funds

are utilized to pay previous investors in the absence of any underlying security, legitimate investment vehicle or other commodity.

#### THE ROLES AND RESPONSIBILITIES OF THE CONSPIRATORS

7. The roles of the conspirators were as follows:

A. Defendant SCOTT W. ROTHSTEIN was a shareholder, Chairman and CEO of RRA. Through his position at RRA, defendant ROTHSTEIN promoted, managed, and supervised the administration of the Enterprise by fraudulently inducing investors through the use of false statements, documents, and computer records to (1) loan money to purported borrowers based upon fraudulent promissory notes and fictitious bridge loans, and (2) invest funds based upon anticipated pay-outs from purported confidential settlement agreements which had been reached between and among certain individuals and business entities. These settlement agreements were falsely presented as having been reached between putative plaintiffs in civil cases and putative defendants based upon the forbearance of civil claims in sexual harassment and/or whistle-blower cases.

B. Other conspirators, known and unknown to the United States Attorney, agreed with one another and with defendant ROTHSTEIN to take actions to further the operation and success of the "Ponzi" scheme, including presenting the aforesaid investments to potential investors as legitimate investment vehicles, when in fact they were not; fraudulently inducing investors to place funds into these investment vehicles by making material misstatements of facts as set forth below; assuring potential investors and investors that sufficient funds existed to pay returns on these investments, when in fact such funds did not exist; creating, and transferring funds into and from, various accounts at financial institutions in order to further the unlawful scheme; and realizing

profits from the operation of the Ponzi scheme through the acquisition of money generated as proceeds from the scheme and through the acquisition of real and personal property.

#### MANNER AND MEANS OF THE RACKETEERING CONSPIRACY

8. It was part of the conspiracy that the defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

9. Defendant ROTHSTEIN and other co-conspirators initiated the criminal conduct alleged in the instant Information in order to personally enrich themselves and to supplement the income and sustain the daily operation of RRA.

10. Defendant ROTHSTEIN and other co-conspirators fraudulently solicited investors to loan money based upon promissory notes and bridge loans to and from purported clients of RRA. Defendant ROTHSTEIN falsely alleged that clients of RRA requested short-term financing for undisclosed business deals. Defendant ROTHSTEIN falsely alleged that the purported clients were willing to pay high rates of return on loans negotiated by Defendant ROTHSTEIN. In fact, defendant ROTHSTEIN was aware that no such clients or requests for business financing actually existed.

11. Defendant ROTHSTEIN and other co-conspirators participated in an investment scheme commonly known as a "Ponzi" scheme. The "Ponzi" scheme involved the sale of purported confidential settlement agreements in sexual harassment and/or whistle-blower cases. The potential investors were told by defendant ROTHSTEIN and other co-conspirators that confidential settlement agreements were available for purchase. The purported settlements were allegedly available in amounts ranging from hundreds of thousands of dollars to millions of dollars and could be purchased at a discount and repaid to the investors at face value over time.

12. Defendant ROTHSTEIN and other co-conspirators utilized the offices of RRA and the offices of other co-conspirators to convince potential investors of the legitimacy and success of the law firm, which enhanced the credibility of the purported investment opportunity.

13. Defendant ROTHSTEIN and other co-conspirators made false and misleading statements and omissions which were intended to fraudulently induce potential investors into purchasing the confidential settlements.

14. Defendant ROTHSTEIN and other co-conspirators made the following fraudulent representations to potential investors in order to induce them to purchase the purported settlements:

- A. That the purported settlements were highly confidential in order to protect the reputation of the company authorizing the settlement and the executives involved;
- B. That the plaintiffs in the purported sexual harassment and/or whistle-blower cases preferred to settle the cases in order to avoid the emotional embarrassment of pursuing a claim in a public forum;
- C. That RRA originated its own cases from reputation, internal staff and outside referrals from other law firms;
- D. That RRA retained a company that owned internet sites and well-placed "800" numbers designed to attract a large volume of high quality cases;
- E. That RRA rigorously screened the purported sexual harassment and/or whistle-blower settlement agreements;

- F. That RRA utilized former law enforcement personnel and employed highly sophisticated investigative methods in selecting and pursuing claims against purported defendants;
- G. That RRA or other law firms pursued purported settlements with defendant companies prior to the initiation of litigation;
- H. That RRA or other law firms negotiated with the purported defendant company after such company was made aware of the alleged claim by the plaintiff;
- I. That RRA or other law firms purportedly negotiated with the defendant company and reached an agreement which contained the settlement amount and the payment terms;
- J. That because the purported settlements occurred prior to the initiation of litigation, there was no court or governmental entity involved in the transaction;
- K. That the alleged defendant companies sent by wire transfer to RRA or other law firms' trust accounts the full proceeds of the purported settlements;
- L. That during the settlement conference or other settlement negotiations when a purported plaintiff protested the extended payment schedule, RRA or other law firms presented the purported plaintiff with the option of receiving a discounted lump sum payment from an unrelated confidential funding source;
- M. That RRA or other co-conspirators prepared a purported Assignment of Settlement Agreement in which the investor agreed to acquire the right to the

purported settlement payments for a discounted lump sum payment made to the purported plaintiff;

- N. That when RRA received the payment by the investor it immediately disbursed those funds to the purported plaintiff; and
- O. That RRA made payment to the investor pursuant to the purported payment schedule set forth in the purported settlement agreement.

15. Defendant ROTHSTEIN and other co-conspirators falsely informed potential investors that funds were maintained in designated trust accounts for the benefit of the individual investor and that these funds were verified on a regular basis, weekly if not more often, by two independent verification sources, one being an attorney and the other being an independent financial advisor (hereinafter referred to "independent verifiers").

16. Defendant ROTHSTEIN and other co-conspirators falsely informed potential investors that RRA's trust accounts were maintained with a well established international banking institution, in accordance with the rules and regulations of the Florida Bar, and that access to balances in the trust accounts was allegedly monitored by one of the two independent verifiers.

17. Defendant ROTHSTEIN and other co-conspirators falsely informed potential investors that due diligence would be undertaken with the following provisions:

- A. An "independent verifier" would be permitted to ask questions of Defendant ROTHSTEIN and/or other co-conspirators to review the opportunity and structure;
- B. The "independent verifier" would have the opportunity to randomly review selected completed transactions to confirm the veracity of the information;

- C. The "independent verifier" had already reviewed current transactions, including wire transfers received from defendants and payments made to plaintiffs;
- D. The "independent verifier" would have the opportunity to visit and speak with a senior banking officer at the local branch of the financial institution to confirm current trust account bank balances through bank statements provided on line; and
- E. The "independent verifier" had the opportunity to meet with a senior banking officer to verify that the trust accounts were "locked" and to verify the strength of RRA's financial position and relationship with the bank.

18. Defendant ROTHSTEIN and other co-conspirators established numerous trust accounts in the name of RRA in order to convince potential and current investors of the legitimacy of the confidential settlement agreements and the security of such investments.

19. Defendant ROTHSTEIN and other co-conspirators prepared and used altered bank statements, purportedly issued from a well-established international financial institution, to fraudulently convince potential and current investors that funds had been received from the purported defendant companies and were maintained in trust accounts.

20. In order to deceive investors, defendant ROTHSTEIN and other co-conspirators created, altered and/or maintained fictitious online banking information regarding the purported trust accounts which falsely reflected the amount of funds maintained in such accounts, the receipt of funds wired from the alleged defendant companies and the transmission of funds by wire to the alleged plaintiffs,

21. Defendant ROTHSTEIN and other co-conspirators created false and fictitious documents, including confidential settlement agreements, assignment of settlement agreements and proceeds, sale and transfer agreements, and personal guaranties by Defendant ROTHSTEIN, among other documents.

22. Defendant ROTHSTEIN and other co-conspirators facilitated the movement and transfer of funds between and among numerous trust accounts and operating accounts in order to perpetuate the scheme. The movement and transfer of such funds insured that monies were available in the individual trust accounts in order to make scheduled payments to investors.

23. Defendant ROTHSTEIN and other co-conspirators made false statements to current investors in order to convince them to re-invest in additional purported confidential settlement agreements.

24. Defendant ROTHSTEIN and other co-conspirators facilitated the creation of false and fictitious "lock letters" which were issued by an executive at the financial institution where the trust and operating accounts were maintained. Such "lock letters" falsely reflected that the funds maintained in specific trust accounts would only be disbursed to specific investors.

25. Defendant ROTHSTEIN and other co-conspirators utilized funds received from investors to pay the promised "return on investment" to earlier investors.

26. Defendant ROTHSTEIN and other co-conspirators also initiated and conducted a scheme to defraud clients of RRA in order to perpetuate the "Ponzi" scheme. Such clients had retained RRA to institute and file a civil lawsuit. Unknown to the clients, RRA settled the lawsuit and obligated the clients to pay \$500,000 to the defendant. In order to commit the fraud and deceive the clients, defendant ROTHSTEIN and other co-conspirators created a false and fraudulent court

order purportedly signed by a Federal District Court Judge which falsely alleged that the clients had prevailed in the lawsuit and were owed a judgement of approximately \$23 million. The fraudulent court order also falsely stated that the defendant had transferred funds to the Cayman Islands in order to avoid paying the judgement.

27. Defendant ROTHSTEIN and other co-conspirators falsely advised the clients on several occasions that in order to recover the defendant's funds, they had to post bonds to be held in the RRA trust account. Defendant ROTHSTEIN and other co-conspirators fraudulently caused the clients to wire transfer approximately \$57 million over several years to a trust account controlled by defendant ROTHSTEIN, purportedly to satisfy the bonds.

28. Defendant ROTHSTEIN and other co-conspirators caused the funds transmitted by the clients to be transferred to other RRA trust accounts in order to perpetuate the "Ponzi" scheme and to enrich those co-conspirators who were associated with the Enterprise.

29. Defendant ROTHSTEIN and other co-conspirators were questioned by the clients as to the progress of the alleged lawsuit. In order to delay the return of funds to the clients, defendant ROTHSTEIN fraudulently created a false Federal court order purportedly issued by a United States Magistrate Judge allegedly ordering RRA to return the transmitted funds by a later date.

30. Defendant ROTHSTEIN and other co-conspirators utilized funds obtained through the "Ponzi" scheme to supplement and support the operation and activities of RRA, to expand RRA by the hiring of additional attorneys and support staff, to fund salaries and bonuses, and to acquire larger and more elaborate office space and equipment in order to enrich the personal wealth of persons employed by and associated with the Enterprise.

31. Defendant ROTHSTEIN and other co-conspirators utilized funds illegally obtained through the "Ponzi" scheme to make political contributions to local, state and federal political candidates, in a manner designed to conceal the true source of such funds and to circumvent state and federal laws governing the limitations and contribution of such funds.

32. Defendant ROTHSTEIN and other co-conspirators used other corporations in order to launder proceeds generated from the "Ponzi" scheme to conceal the source of the funds utilized to make political contributions in order to promote the "Ponzi" scheme.

33. Defendant ROTHSTEIN and other co-conspirators paid large bonuses to employees of RRA purportedly as an award for exemplary work. Prior to the receipt of the bonuses, the employees were instructed to make large contributions to political candidates in the employees' names. Such conduct was designed to conceal the true source of the contribution and to illegally circumvent campaign finance laws.

34. Defendant ROTHSTEIN and other co-conspirators distributed lavish gifts including exotic cars, jewelry, boats, loans, cash and bonuses to individuals and members of RRA in order to engender goodwill and loyalty and to create the appearance of a successful law firm.

35. Defendant ROTHSTEIN and other co-conspirators made large charitable contributions to public and private charitable institutions, including hospitals and other legitimate charitable and nonprofit organizations using funds derived from the "Ponzi" scheme.

36. Defendant ROTHSTEIN and other co-conspirators utilized funds illegally obtained through the "Ponzi" scheme to hire members of local police departments purportedly to provide security for RRA and defendant ROTHSTEIN's personal residence. "Ponzi" scheme funds were also used to provide gratuities to high ranking members of police agencies in order to curry favor

with such police personnel and to deflect law enforcement scrutiny of the activities of RRA and defendant ROTHSTEIN.

37. Defendant ROTHSTEIN and other co-conspirators utilized funds obtained through the "Ponzi" scheme in order to purchase controlling interests in restaurants located in the Southern District of Florida. Such restaurants were used in part as a mechanism to give gratuities to individuals, including politicians, business associates and attorneys, in order to foster goodwill and loyalty, as a location to solicit potential investors and as a secure location for conspiratorial meetings.

38. Defendant ROTHSTEIN and other co-conspirators associated with affluent and politically connected individuals in order to lure wealthy investors into the "Ponzi" scheme.

39. Defendant ROTHSTEIN and other co-conspirators associated with well known sports figures and politicians, in public forums and elsewhere, in order to gain greater notoriety and to create the appearance of wealth and legitimacy. Such acts were calculated in part to enhance defendant ROTHSTEIN's ability to solicit potential investors in the "Ponzi" scheme.

40. Defendant ROTHSTEIN and other co-conspirators used funds derived from the "Ponzi" scheme to maintain the appearance of affluence and wealth, by purchasing expensive real and personal property, in order to convince potential investors of the legitimacy of RRA and of the purported investment opportunities. Defendant ROTHSTEIN purchased expensive real property, personal property, business interests, vessels, vehicles and other indicia of success and wealth.

All in violation of Title 18, United States Code, Section 1962(d).

**COUNT 2**  
(Money Laundering Conspiracy, 18 U.S.C. §1956(h))

1. The General Allegations and paragraphs 5 through 40 of Count 1 of the Information are realleged and incorporated herein by reference.

2. TD Bank, N.A., (hereinafter referred to as TD Bank) was a commercial bank with branch offices in thirteen (13) states, including a branch office in Weston, Florida. The executive offices of TD Bank were located in Portland, Maine and Cherry Hill, New Jersey. Defendant ROTHSTEIN and RRA maintained approximately thirty-eight (38) bank accounts at TD Bank, which were utilized during the course of the "Ponzi" scheme.

3. Gibraltar Private Bank and Trust (hereinafter referred to as Gibraltar Bank) was a commercial bank with seven (7) branch offices, including a branch office in Fort Lauderdale, Florida. Defendant ROTHSTEIN and RRA maintained at least four (4) bank accounts at Gibraltar Bank, which were utilized during the course of the "Ponzi" scheme.

4. From in or about 2005 and continuing thereafter through in or about November 2009, in Broward County, in the Southern District of Florida and elsewhere, the defendant,

**SCOTT W. ROTHSTEIN,**

did knowingly conspire, confederate, and agree with persons known and unknown to the United States Attorney, to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956 and 1957, that is:

i. to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, mail fraud and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, with the intent to promote the carrying on of said specified unlawful activities, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial

transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);

ii. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, mail fraud and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

iii. to knowingly engage and attempt to engage, in monetary transactions by, through or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, which property having been derived from a specified unlawful activity, that is, mail fraud and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, in violation of Title 18, United States Code, Section 1957.

All in violation of Title 18, United States Code, Section 1956(h).

**COUNT 3**

(Mail and Wire Fraud Conspiracy, 18 U.S.C. §1349)

1. The General Allegations and paragraphs 5 through 40 of Count 1 of the Information are realleged and incorporated herein by reference.

2. From in or about 2005 and continuing thereafter through in or about November 2009, in Broward County, in the Southern District of Florida and elsewhere, the defendant,

SCOTT W. ROTHSTEIN,

did knowingly combine, conspire, confederate, and agree with other persons known and unknown to the United States Attorney to commit offenses against the United States in violation of Title 18, United States Code, Sections 1341 and 1343, that is:

i. to knowingly and with intent to defraud devise and intend to devise a scheme and artifice to defraud and to obtain money and property from others by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, and causing to be delivered certain mail matter by any private and commercial interstate carrier, according to the directions thereon, for the purpose of executing the scheme, in violation of Title 18, United States Code, Section 1341

ii. to knowingly and with intent to defraud devise and intend to devise a scheme and artifice to defraud and to obtain money and property from others by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, and transmitting and causing to be transmitted by means of wire communications in interstate and foreign commerce, certain signs, signals and sounds, for the purpose of executing the scheme, in violation of Title 18, United States Code, Section 1343.

#### THE PURPOSE AND OBJECT OF THE CONSPIRACY

3. The purpose and object of the conspiracy was to enrich defendant ROTHSTEIN and his co-conspirators by illegally obtaining money from investors and converting the investors' money to their own use and benefit through the operation of the above-described "Ponzi" scheme.

All in violation of Title 18, United States Code, Section 1349.

#### COUNTS 4 and 5 (Wire Fraud, 18 U.S.C. §1343)

1. The General Allegations and paragraphs 5 through 40 of Count 1 of the Information are realleged and incorporated herein by reference.

2. On or about the dates enumerated as to each count below, at Broward and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendant,

SCOTT W. ROTHSTEIN,

did knowingly and with intent to defraud devise and intend to devise a scheme and artifice to defraud and to obtain money and property from others by means of materially false and fraudulent pretenses,

representations, and promises, knowing that such pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing the scheme, transmitted and caused to be transmitted certain wire communications in interstate and foreign commerce, as more particularly described below:

COUNT	DATE	WIRE COMMUNICATION
4	December 2, 2008	Interstate wire transfer sent from TD Bank to Gibraltar Bank
5	October 16, 2009	Interstate wire transfer sent to TD Bank from JP Morgan Chase

All in violation of Title 18, United States Code, Sections 1343 and 2.

#### **FORFEITURE ALLEGATIONS**

1. The allegations of this Information are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America of certain property in which the defendant has an interest pursuant to 7(c)(2) and 32.2(a), Federal Rules of Criminal Procedure. Forfeiture is being sought pursuant to the provisions of Title 18, United States Code, Sections 1963(a), 982(a) and 981(a)(1)(C), as made applicable hereto by Title 28, United States Code, Section 2461.

2. Upon conviction of the offense of RICO Conspiracy set forth in Count 1 of the Information, the defendant, SCOTT W. ROTHSTEIN, shall forfeit to the United States the following property:

- i. Any interest acquired or maintained pursuant to Section 1962;
- ii. Any interest in, security of, claim against, or property or contractual rights of any kind affording a source of influence over, the

enterprise described in the Information which was established, operated, controlled and conducted pursuant to Title 18, United States Code, Section 1962; and

iii. Any property constituting or derived from proceeds obtained directly and indirectly from racketeering activity pursuant to Title 18, United States Code, Section 1962.

3. Upon conviction of the offense of Money Laundering Conspiracy set forth in Count 2 of the Information, the defendant, SCOTT W. ROTHSTEIN, shall forfeit to the United States all property, real or personal, involved in or traceable to the offense which property shall include:

i. all money and other property that was the subject of each transaction, transportation, transmission and transfer in violation of Section 1956(h);

ii. all commissions, fees and other property constituting proceeds obtained as a result of those violations; and

iii. all property used in any manner and part to commit and to facilitate the commission of those violations.

4. Upon conviction of the offense of Conspiracy to Commit Mail Fraud and Wire Fraud and to Commit Wire Fraud as set forth in Counts 3, 4, and 5 of the Information, the defendant, SCOTT W. ROTHSTEIN, shall forfeit to the United States, all property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

5. The property subject to forfeiture, pursuant to Title 18, United States Code, Sections 1963, 982(a)(1) and 981(a)(1)(C), includes but is not limited to:

A. A sum of money equal to \$1,200,000,000 in United States currency.

B. **Real Properties (“RP”):**

(RP1) 2307 Castilla Isle, Fort Lauderdale, Florida, hereafter also referred to as “Defendant RP1,” includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as Lauderdale Shores Reamen Plat 15-31 B Lot 2 Blk 5 with a Folio Number of 5042 12 13 0210;

(RP2) 2308 Castilla Isle, Fort Lauderdale, Florida, hereafter also referred to as “Defendant RP2,” includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as: Lauderdale Shores Reamen Plat 15-31 B Lot 2 Blk 4 with a Folio Number of 5042 12 13 0020;

(RP3) 2316 Castilla Isle, Fort Lauderdale, Florida, hereafter also referred to as “Defendant RP3,” includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as: Lauderdale Shores Reamen Plat 15-31 B Lot 3 & Lot 4 W ½ Blk 4 with a Folio Number of 5042 12 13 0030;

(RP4) 30 Isla Bahia Drive, Fort Lauderdale, Florida, hereafter also referred to as “Defendant RP4,” includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as: Isla Bahia 47-27 B Lot 63 with a Folio Number of 5042 13 16 0640;

(RP5) 29 Isla Bahia Drive, Fort Lauderdale, Florida, hereafter also referred to as “Defendant RP5,” includes all buildings, improvements, fixtures, attachments and easements

found therein or thereon, and is more particularly described as: Isla Bahia 47-27 B Lot 35 with a Folio Number of 5042 13 16 0360;

(RP6) 350 SE 2<sup>nd</sup> Street, Unit 2840, Fort Lauderdale, Florida, hereafter also referred to as "Defendant RP6," includes that portion of the condominium, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as: 350 Las Olas Place Condo Unit 2840 with a Folio Number of 5042 10 AN 1490;

(RP8) 2133 Imperial Point Drive, Fort Lauderdale, Florida, hereafter also referred to as "Defendant RP8," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as: Imperial Point 1 Sec 53-44 B Lot 11 Blk 22 with a Folio Number of 4942 12 07 2020;

(RP9) 2627 Castilla Isle, Fort Lauderdale, Florida, hereafter also referred to as "Defendant RP9," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as: Lauderdale Shores Reamem Plat 15-31 B Lot 22 Blk 5 with a Folio Number of 5042 12 13 0380;

(RP10) 10630 NW 14<sup>th</sup> Street, Apt. 110, Plantation, Florida, hereafter also referred to as "Defendant RP10," includes that portion of the condominium/townhome, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as: OPTIMA VILLAGE 1-"C" CONDO UNIT 201 BLDG 2 with a Folio Number of 4941 31 AC 0110;

(RP11) 227 Garden Court, Lauderdale by the Sea, Florida, hereafter also referred to as "Defendant RP11," includes that portion of the buildings, improvements, fixtures,

attachments and easements found therein or thereon, and is more particularly described as: SILVER SHORES UNIT A 28-39 B POR of Lot 4, BLK 5 DESC AS TO BEG AT SE COR SAID LOT 4, N 79.37 W 37.75, S 79.37, E 35.75 TO POB AKA: UNIT E MARINA VILLAGE TOWNHOMES 227GARDEN with a Folio Number of 4943 18 24 0050;

(RP12) 708 Spangler Boulevard, Bay 1, Hollywood, Florida, hereafter also referred to as "Defendant RP12," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as: HARBOR VIEW 10-5 B PORTION OF LOTS 1 & 2 BLK 2 DESC AS COMM 25 S OF NE COR OF LOT 2 ON E/L, W 20.52 ALG S/R/W/L OF ST RD 84, S 15.72 TO POB, S 7.25, E 12.59, S 24.40, W 29.92, N 7.66, W 31.74, N 24.00, E 49.07 TO POB AKA: BAY 1 PORTSIDE with a Folio Number of 5042 23 28 0010;

(RP13) 1012 East Broward Boulevard, Fort Lauderdale, Florida, hereafter also referred to as "Defendant RP13," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as: BEVERLY HEIGHTS 1-30 B LOT 1 W 100, LOT 2 W 100 BLK 17 with a Folio Number of 5042 11 07 0540;

(RP14) 950 N Federal Highway, Fort Lauderdale, Florida, hereafter also referred to as "Defendant RP14," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as: 31-48-43 S 150 OD FOL DESC, BEG INTER E R/W/L ST RD 5, N TO POB with a Folio Number of 4843 31 00 0401;

(RP15) 350 Las Olas Boulevard, Commercial Unit 2, Fort Lauderdale, Florida, hereafter also referred to as "Defendant RP15," includes all portion of that condominium, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as: 350 LAS OLAS PLACE COMM CONDO UNIT CU2 with a Folio Number of 5042 10 AP 0020;

(RP16) 361 SE 9 Lane, Boca Raton, Florida hereafter also referred to as "Defendant RP16," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon;

(RP17) 1198 N Old Dixie Highway, Boca Raton, Florida hereafter also referred to as "Defendant RP17," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon;

(RP18) 1299 N Federal Highway, Boca Raton, Florida hereafter also referred to as "Defendant RP18," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon;

(RP19) 151 East 58 Street, Apartment 42D, New York, New York hereafter also referred to as "Defendant RP19," includes all portion of that condominium, improvements, fixtures, attachments and easements found therein or thereon;

(RP20) 11 Bluff Hill Cove Farm, Narragansett, Rhode Island hereafter also referred to as "Defendant RP20," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon;

(RP21) 15 Bluff Hill Cove Farm, Narragansett, Rhode Island hereafter also referred to as “Defendant RP21,” includes all buildings, improvements, fixtures, attachments and easements found therein or thereon;

(RP22) 353 4 Ave., Unit 12-H, Brooklyn, NY hereafter also referred to as “Defendant RP22,” includes all portion of that condominium, improvements, fixtures, attachments and easements found therein or thereon;

(RP23) 290W 11th St #1C, NY, NY hereafter also referred to as “Defendant RP23,” includes all portion of that condominium, improvements, fixtures, attachments and easements found therein or thereon; and

(RP24) Versace Mansion/Casa Casuarina-10% Ownership hereafter also referred to as “Defendant RP24,” includes all buildings, improvements, fixtures, attachments and easements found therein or thereon;

**C. Vehicles and Vessels (“VV”):**

(VV1) 1990 Red Ferrari F40 Coupe, VIN: ZFFMN34A5L0087066;

(VV2) 2009 White Bentley Convertible, VIN: SCBDR33W29C059672;

(VV3) 2008 Yellow McLaren Mercedes Benz SLR, VIN: WDDAK76F98M001788;

(VV4) 2007 Black Limousine Ford Expedition, VIN: 1F1FK15557LA59223;

(VV5) 2009 Red Ferrari 430 Spider, VIN: ZFFEW59A380163011;

(VV6) 2007 Silver Rolls Royce Convertible, VIN: SCA1L68557UX23044;

(VV7) 2006 Silver Hummer H1, VIN: 137PH84396E220665;

(VV8) 2008 Cadillac Escalade, VIN: 1GYEC63858R234458;

(VV9) 1967 Red Convertible Corvette, VIN: 194677S104745;

(VV10) 2009 Black Bugatti Veyron EB 16.4, VIN: VF9SA25C28M795153;  
(VV11) 2008 Blue Rolls Royce Drophead Convertible, VIN: SCA2D68528UX16071;  
(VV17) 2007 87' Warren, Hull # WAR87777B707;  
(VV18) 33' Aquariva, Hull # XFA33R74G405;  
(VV19) 2009 11' Yamaha Jet Ski, Hull # YAMA3661I809;  
(VV20) 2009 11' Yamaha VS, Hull # YAMA3626I809;  
(VV21) 2009 11' Yamaha VS, Hull # YAMA2679G809;  
(VV22) 1999 55' Sea Ray 540 Sundancer, SERY001899;  
(VV23) 2009 Yamaha Jet Ski, Hull # YAMA4288K809; and  
(VV 24) 2010 White Lamborghini lp-670sv, VIN: ZHWBU8AHXALA03837.

**D. Tangibles ("T")**

- (T1) 304 pieces of jewelry, watches, necklaces and earrings seized on or about Monday, November 9, 2009 from the residence of Scott and Kimberly Rothstein;
- (T2) 16 DuPont Lighters seized on or about Monday, November 9, 2009 from the residence of Scott and Kimberly Rothstein;
- (T3) 3 pieces sports memorabilia seized on or about Monday, November 9, 2009 from the residence of Scott and Kimberly Rothstein;
- (T4) \$271,160 in United States currency seized on or about Monday, November 9, 2009 from the residence of Scott and Kimberly Rothstein;
- (T5) \$1,500 in United States currency, seized on about Wednesday, November 4, 2009, from the office of Scott W. Rothstein at the law firm of Rothstein, Rosenfeldt and Adler, P.A.;

- (T6) \$30,000 in American Express Gift Cards to the attention of Scott Rothstein, obtained from UPS on or about November 12, 2009;
- (T7) \$50,000 in American Express Gift Cards to the attention of Scott Rothstein, obtained from UPS on or about November 13, 2009;
- (T8) 5 additional watches being voluntarily turned over to the United States; and
- (T9) Guitar collection of Scott W. Rothstein, located at the residence of Scott and Kimberley Rothstein, valued between \$10,000 and \$20,000.

**E. Bank Accounts ("BA")**

- (BA1) Fidelity Investments Stock Account, in the name of Scott W. Rothstein, valued at approximately \$1,263,780;
- (BA2) Gibraltar Bank account [REDACTED], in the approximate amount of \$484,900.68;
- (BA3) Gibraltar Bank account [REDACTED], in the approximate amount of \$53,448.51;
- (BA4) Gibraltar Bank account [REDACTED], in the approximate amount of \$71,793.06;
- (BA5) Gibraltar Bank account [REDACTED], in the approximate amount of \$995,521.42;
- (BA6) Bank account [REDACTED] at Banque Populaire, Morocco, in the name of Scott Rothstein, in the approximate amount of \$12,000,000;
- (BA7) Bank account at Banque Populaire, Morocco, in the name of Ahnick Khalid, up to the amount of \$2,000,000;
- (BA8) Bank account at Banque Populaire, Morocco, in the name of Steve Caputi, up to the amount of \$1,000,000;

(BA9) Toronto Dominion Bank, N.A. account [REDACTED] in the name of Rothstein

Rosenfeldt Adler, P.A. which, on or about November 11, 2009, contained the approximate amount of \$54,021.27;

(BA10) Toronto Dominion Bank, N.A. account [REDACTED] in the name of Rothstein

Rosenfeldt Adler, P.A. which, on or about November 11, 2009, contained the approximate amount of \$10,085.00;

(BA11) Toronto Dominion Bank, N.A. account [REDACTED] in the name of Rothstein

Rosenfeldt Adler, P.A., Attorney Trust Account 3, which, on or about November 11, 2009, contained the approximate amount of \$720,892.08;

(BA12) Toronto Dominion Bank, N.A. account [REDACTED] in the name of DJB Financial

Holding, which, on or about November 11, 2009, contained the approximate amount of \$64,970.00;

(BA13) Toronto Dominion Bank, N.A. account [REDACTED] the name of RRA Sports and

Entertainment LLC, which, on or about November 11, 2009, contained the approximate amount of \$10,490.10;

(BA14) Toronto Dominion Bank, N.A. account [REDACTED] in the name of RRA Goal Line

Management, LLC, which, on or about November 11, 2009, contained the approximate amount of \$25,216.27;

(BA15) Toronto Dominion Bank, N.A. account [REDACTED] in the name of Rothstein

Rosenfeldt Adler, P.A., which, on or about November 11, 2009, contained the approximate amount of \$20,080.00.

**F. Business Interests (“BI”)**

- (BI1) Stock certificates, if issued, or the beneficial interest in such shares, of 50,000 shares of capital stock, in Gibraltar Private Bank & Trust, a federally chartered stock savings association, purchased in or about September 2009 by GBPT, LLC, a Delaware Limited Liability Company, by its manager, Bahia Property Management, LLC, a Delaware Limited Liability Company, by its co-manager, Scott W. Rothstein;
- (BI2) Scott W. Rothstein’s equity interest in QTask;
- (BI3) Scott W. Rothstein’s equity interest in Broward Bank of Commerce;
- (BI4) Scott W. Rothstein’s equity interest in Bova Ristorante;
- (BI5) Scott W. Rothstein’s equity interest in Bova Cucina;
- (BI6) Scott W. Rothstein’s equity interest in Bova Prime;
- (BI7) Scott W. Rothstein’s equity interest in Café Iguana, Pembroke Pines, Florida;
- (BI8) Scott W. Rothstein’s equity interest in Cart Shield USA, LLC;
- (BI9) Scott W. Rothstein’s equity interest in Renato Watches;
- (BI10) Scott W. Rothstein’s equity interest in Edify LLC;
- (BI11) Scott W. Rothstein’s equity interest in V Georgio Vodka;
- (BI12) Scott W. Rothstein’s equity interest in Sea Club;
- (BI13) Scott W. Rothstein’s equity interest in North Star Mortgage;
- (BI14) Scott W. Rothstein’s equity interest in Kip Hunter Marketing;
- (BI15) Scott W. Rothstein’s equity interest in RRA Sports and Entertainment, LLC;
- (BI16) Scott W. Rothstein’s equity interest in Versace Mansion/Casa Casuarina, including 10 year Operating Agreement with 2 ten year options;

(BI17) Scott W. Rothstein's equity interest, and licensing rights, in Alternative Biofuel Company;

(BI18) Scott W. Rothstein's equity interest in RRA Goal Line Management;

(BI19) Scott W. Rothstein's equity interest in Iron Street Management, LLC;

(BI20) Scott W. Rothstein's equity interest in, and loan to, Africat Equity IG Decide;

(BI21) Scott W. Rothstein's equity interest in, and rents derived from 1198 Dixie LLC;

(BI22) Scott W. Rothstein's equity interest in, and rents derived from 1299 Federal LLC;

(BI23) Promissory Note by Uniglobe in favor of Scott W. Rothstein; and

(BI24) All equity interest held by or on behalf of Scott W. Rothstein, in the following corporations and entities:

- a. 29 Bahia LLC;
- b. 235 GC LLC;
- c. 350 LOP#2840 LLC;
- d. 353 BR LLC;
- e. 10630 #110 LLC;
- f. 708 Spangler LLC;
- g. 1012 Broward LLC;
- h. 1198 Dixie LLC;
- I. 1299 Federal LLC;
- j. 2133 IP LLC;
- k. 15158 LLC;
- l. AANG LLC;

- m. **AAMG1 LLC;**
- n. **AAMM Holdings;**
- o. **ABT Investments LLC;**
- p. **Advanced Solutions;**
- q. **Bahia Property Management LLC;**
- r. **Boat Management LLC;**
- s. **BOSM Holdings LLC;**
- t. **BOVA Prime LLC;**
- u. **BOVA Restaurant Group LLC;**
- v. **The BOVA Group LLC;**
- w. **BOVA Smoke LLC;**
- x. **BOVCU LLC;**
- y. **BOVRI LLC;**
- z. **Broward Financial Holdings, Inc.;**
- aa. **CI07 LLC;**
- ab. **CI08 LLC;**
- ac. **CI16 LLC;**
- ad. **CI27 LLC;**
- ae. **CSU LLC;**
- af. **D & D Management & Investment LLC;**
- ag. **D & S Management and Investment LLC;**
- ah. **DJB Financial Holdings LLC;**

DYMMU LLC; ai. I  
Full Circle Fort Lauderdale LLC; aj. I  
Full Circle Trademark Holdings LLC; ak. I  
GHW1 LLC; al. C  
DNL GEAH LLC; am. I  
LK3 LLC; an. I  
S Management LLC; ao. I  
URCL LLC; ap. I  
Judah LLC; aq. I  
Kendall Sports Bar; ar. I  
Kip Hunter Marketing LLC; as. I  
NF Servicing LLC; at. N  
NRI 11 LLC; au. I  
NRI 15 LLC; av. I  
NS Holdings LLC; aw. N  
PRCH LLC; ax. I  
PK Adventures LLC; ay. I  
PK's Wild Ride Ltd; az. I  
Rothstein Family Foundation; ba. I  
RRA Consulting Inc.; bb. I  
RRA Goal Line Management LLC; bc. I  
RRA Sports and Entertainment LLC; bd. I

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- be. RSA 11<sup>th</sup> Street LLC;
- bf. RW Collections LLC;
- bg. S & KEA LLC;
- bh. Scorb LLC;
- bi. Tipp LLC;
- bj. VGS LLC;
- bk. The Walter Family LLC;
- bl. Walter Industries LLC;
- bm. WPBRS LLC;
- bn. WAWW;
- bo. WAWW 2 LLC;
- bp. WAWW 3 LLC;
- bq. WAWW 4 LLC;
- br. WAWW 5 LLC;
- bs. WAWW 6 LLC;
- bt. WAWW 7 LLC;
- bu. WAWW 8 LLC;
- bv. WAWW 9 LLC;
- bw. WAWW 10 LLC;
- bx. WAWW 11 LLC;
- by. WAWW 12 LLC;
- bz. WAWW 14 LLC;

- ca. WAWW 15 LLC;
- cb. WAWW 16 LLC;
- cc. WAWW 17 LLC;
- cd. WAWW 18 LLC;
- ce. WAWW 19 LLC;
- cf. WAWW 20 LLC;
- cg. WAWW 21 LLC;
- ch. WAWW 22 LLC;
- ci. JB Boca M Holdings LLC;

and

G. **Contributions (“C”), hereinafter collectively referred to as “the defendant contributions:”**

- (C1) \$6,000 in campaign contributions made to Alex Sink and voluntarily offered, and turned over, to the United States on behalf of Alex Sink;
- (C2) \$40,000 in campaign contributions to Republican Party of Florida, “Florida” account and voluntarily offered, and turned over, to the United States by the Republican Party of Florida;
- (C3) \$10,000 in campaign contributions to Republican Party of Florida, “Federal” account and voluntarily offered, and turned over, to the United States by the Republican Party of Florida;
- (C4) \$90,000 in campaign contributions to Republican Party of Florida and voluntarily offered, and turned over, to the United States by the Republican Party of Florida;

(C5) \$5,000 in campaign contributions to Republican Party of Florida by Rothstein business entity known as WAWW and voluntarily offered, and turned over, to the United States by the Republican Party of Florida;

(C6) \$800,000 Charitable Donation to Joe DiMaggio Children's Hospital, which hospital voluntarily advised the United States of the donation from the Rothstein Family Foundation, for the purpose of facilitating forfeiture;

(C7) \$1,000,000 Charitable Donation to Holy Cross Hospital, which hospital voluntarily advised the United States of the donation from the Rothstein Family Foundation, for the purpose of facilitating forfeiture;

(C8) \$9,600 in campaign contributions to Governor Charlie Crist, voluntarily offered, and turned over, to the United States by the office of Charlie Crist; and

(C9) All funds voluntarily turned over to the United States (IRS/FBI), since in or about October 28, 2009, in response to publicity regarding Scott W. Rothstein.

6. If any of the property described above as being subject to forfeiture, as a result of any act and omission of the defendant -

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third party;
- iii. has been placed beyond the jurisdiction of the court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m), and pursuant to Title 21, United States Code, Section 853(p), made applicable hereto by Title 18, United

States Code, Section 982(b), and pursuant to Rule 32.2 Fed. R. Crim. P., to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

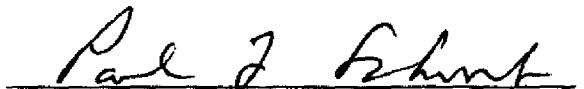
All pursuant to Title 18, United States Code, Section 1963, Title 18, United States Code, Section 982(a)(1) and Title 18, United States Code, Section 981(a)(1)(C) made applicable through Title 28, United States Code, Section 2461; and the procedures outlined at Title 21, United States Code, Section 853.

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JEFFREY H. SŁOMAN  
ACTING UNITED STATES ATTORNEY

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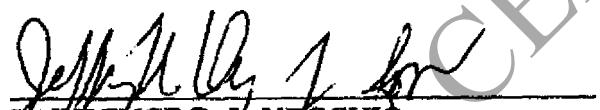
PAUL F. SCHWARTZ  
ASSISTANT UNITED STATES ATTORNEY

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JEFFREY N. KAPLAN  
ASSISTANT UNITED STATES ATTORNEY

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LAWRENCE D. LaVECCHIO  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

vs.

SCOTT W. ROTHSTEIN

CASE NO. \_\_\_\_\_

**CERTIFICATE OF TRIAL ATTORNEY\***

Defendant. \_\_\_\_\_

Superseding Case Information:

Court Division: (Select One)

Miami \_\_\_\_\_  Key West \_\_\_\_\_  
 FTL \_\_\_\_\_  WPB \_\_\_\_\_  FTP \_\_\_\_\_

New Defendant(s) \_\_\_\_\_  
Number of New Defendants \_\_\_\_\_  
Total number of counts \_\_\_\_\_

Yes  \_\_\_\_\_ No \_\_\_\_\_

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) \_\_\_\_\_  
List language and/or dialect \_\_\_\_\_

4. This case will take 0 days for the parties to try.

5. Please check appropriate category and type of offense listed below:  
(Check only one) \_\_\_\_\_

I	0 to 5 days	<input checked="" type="checkbox"/>	Petty	_____
II	6 to 10 days	_____	Minor	_____
III	11 to 20 days	_____	Misdem.	_____
IV	21 to 60 days	_____	Felony	_____
V	61 days and over	_____		

6. Has this case been previously filed in this District Court? (Yes or No) No  
If yes:

Judge: \_\_\_\_\_ Case No. \_\_\_\_\_  
(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) No

If yes:

Magistrate Case No. \_\_\_\_\_

Related Miscellaneous numbers: \_\_\_\_\_

Defendant(s) in federal custody as of \_\_\_\_\_

Defendant(s) in state custody as of \_\_\_\_\_

Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the U.S. Attorney's Office prior to April 1, 2003? Yes  No
8. Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? Yes  No  
If yes, was it pending in the Central Region? Yes No
9. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes  No
10. Does this case originate from a matter pending in the Narcotics Section (Miami) prior to May 18, 2003? Yes  No
11. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? Yes  No

  
Lawrence D. LaVecchio  
ASSISTANT UNITED STATES ATTORNEY  
Florida Bar No. A005500030

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: SCOTT W. ROTHSTEIN

Count #: 1 18 U.S.C. § 1962(d); RICO Conspiracy;

\* Max.Penalty: 20 years imprisonment, \$250,000 fine

---

Count #: 2 18 U.S.C. § 1956(h); Conspiracy to Commit Money Laundering;

\* Max.Penalty: 20 years imprisonment, \$500,000 fine or twice the value of the property involved in the transaction.

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Count #: 3 18 U.S.C. § 1349; Conspiracy to Commit Mail Fraud and Wire Fraud;

\* Max.Penalty: 20 years imprisonment, \$250,000 fine

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Counts #: 4-5 18 U.S.C. §§ 2; 1343; Wire Fraud

\* Max.Penalty: 20 years imprisonment, \$250,000 fine

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\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA )  
Plaintiff )

-vs-

Scott Rothfeld )  
Defendant )

CASE NUMBER: CR 09-6031-57C

REPORT COMMENCING CRIMINAL  
ACTION

# 91256 004

TO: CLERK'S OFFICE MIAMI  
U.S. DISTRICT COURT

FT. LAUDERDALE

W. PALM BEACH

(circle one)

NOTE: CIRCLE APPROPRIATE LOCATION FOR APPEARANCE IN MAGISTRATES  
COURT ABOVE.

COMPLETE ALL ITEMS. INFORMATION NOT APPLICABLE ENTER N/A.

(1) DATE AND TIME OF ARREST: 12/1/09 7:30 a.m./p.m.

(2) LANGUAGE(S) SPOKEN: English

(3) OFFENSE(S) CHARGED: Rock-Teaming Conspiracy 18 USC 1962  
Wire Fraud 18 USC 1511; Money Laundering Conspiracy 18 USC 1956

(4) UNITED STATES CITIZEN:  YES  NO  UNKNOWN

(5) DATE OF BIRTH: 1/62

(6) TYPE OF CHARGING DOCUMENT: (CHECK ONE) Information  
 INDICTMENT  COMPLAINT CASE #  
 BENCH WARRANT FOR FAILURE TO APPEAR  
 PAROLE VIOLATION WARRANT  
ORIGINATING DISTRICT: S FL

COPY OF WARRANT LEFT WITH BOOKING OFFICER?  YES  NO

AMOUNT OF BOND: \$ Detention WHO SET BOND? Pre-Trial

(7) REMARKS: \_\_\_\_\_

(8) DATE: 12/1/09 (9) ARRESTING OFFICER Scott Nevidio

(10) AGENCY FBI (11) PHONE # 105-949-9001

(12) COMMENTS: \_\_\_\_\_

## Report Selection Criteria

**Case ID:** 502008CA028051XXXXMB  
**Docket Start Date:**  
**Docket Ending Date:**

## Case Description

**Case ID:** 502008CA028051XXXXMB  
**Case Caption:** L M V JEFFREY EPSTEIN  
**Division:** AB - GILLEN  
**Filing Date:** Thursday , September 11th, 2008  
**Court:** CA - CIRCUIT CIVIL  
**Location:** MB - MAIN BRANCH  
**Jury:** Y-Jury  
**Type:** ON - OTHER NEGLIGENCE  
**Status:** DAO - DISPOSED AFTER OTHER

## Related Cases

No related cases were found.

## Case Event Schedule

No case events were found.

## Case Parties

Seq #	Assoc	Expn Date	Type	ID	Name	
1			PLAINTIFF	@1516767	M, L	<b>Aliases:</b> none
2	1		ATTORNEY	0542075	EDWARDS, BRAD	<b>Aliases:</b> none
3			DEFENDANT	@1516768	EPSTEIN, JEFFREY	<b>Aliases:</b> none
4		24-APR-	JUDGE	AD	KEYSER, JUDGE	<b>Aliases:</b> none

2009

GREGORY M

5	3		ATTORNEY	0224162	CRITTON JR , ESQ, ROBERT DEWESE	Aliases:	none
6			DEFENDANT	@1653702	KELLEN, SARAH	Aliases:	none
7	3		ATTORNEY	0262013	GOLDBERGER , ESQ, JACK A	Aliases:	none
8			JUDGE	AB	GILLEN, JUDGE JEFFREY DANA	Aliases:	none
9	1		ATTORNEY	0225657	HOWELL ESQ, JAY	Aliases:	none

Docket Entries

Docket Number	Docket Type	Book and Page No.	Attached To:
	00000 - ADDITIONAL COMMENTS		
Filing Date:	11-SEP-2008		
Filing Party:			
Disposition Amount:			
Docket Text:	none.		
	800FF - CAFF		
Filing Date:	11-SEP-2008		
Filing Party:	M, L		
Disposition Amount:			
Docket Text:	none.		
	PE - PENDING		
Filing Date:	11-SEP-2008		

<b>Filing Party:</b>	
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	<i>none.</i>
1	CMP - COMPLAINT
<b>Filing Date:</b>	11-SEP-2008
<b>Filing Party:</b>	M, L
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	<i>none.</i>
2	CCS - CIVIL COVER SHEET
<b>Filing Date:</b>	11-SEP-2008
<b>Filing Party:</b>	M, L
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	<i>none.</i>
3	MOT - MOTION
<b>Filing Date:</b>	11-SEP-2008
<b>Filing Party:</b>	M, L
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	<i>none.</i>
4	SMIS - SUMMONS ISSUED
<b>Filing Date:</b>	11-SEP-2008
<b>Filing Party:</b>	EPSTEIN, JEFFREY
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	SM-08-162222
RCPT - RECEIPT FOR PAYMENT	
<b>Filing Date:</b>	18-SEP-2008
<b>Filing Party:</b>	M, L
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	A Payment of -\$311.00 was made on receipt CAMB243362.
5	ORDG - ORDER GRANTING
<b>Filing Date:</b>	19-SEP-2008
<b>Filing Party:</b>	
<b>Disposition Amount:</b>	

<b>Docket Text:</b>		MOTION TO PROCEED ANONYMOUSLY, GRANTED. D E FRENCH.
6	ORDG - ORDER GRANTING	
<b>Filing Date:</b>	19-SEP-2008	
<b>Filing Party:</b>		
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	MOTION TO PROCEED ANONYMOUSLY, GRANTED. D E FRENCH.	
7	NOAP - NOTICE OF APPEARANCE	
<b>Filing Date:</b>	07-OCT-2008	
<b>Filing Party:</b>	CRITTON JR , ESQ, ROBERT DEWESE	
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	AS COUNSEL FOR DFT JEFFREY EPSTEIN.	
8	MDIS - MOTION TO DISMISS	
<b>Filing Date:</b>	08-OCT-2008	
<b>Filing Party:</b>	EPSTEIN, JEFFREY	
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	FOR MORE DEFINITE STATEMENT AND TO STRIKE DIRECTED TO PLT LM'S COMPLAINT.	
9	RESP - RESPONSE TO:	
<b>Filing Date:</b>	16-OCT-2008	
<b>Filing Party:</b>	M, L	
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	DFT'S MOTION TO DISMISS FOR MOER DEFINITE STATEMENT AND TO STRIKE COMPLINT.	
10	ORSH - ORDER SETTING HEARING	
<b>Filing Date:</b>	17-OCT-2008	
<b>Filing Party:</b>		
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	(SPECIALY) FOR 12/5/08 FROM 9:45 AM TO 10 AM. D E FRENCH.	
11	MDIS - MOTION TO DISMISS	
<b>Filing Date:</b>	29-OCT-2008	
<b>Filing Party:</b>	EPSTEIN, JEFFREY	
<b>Disposition Amount:</b>		

Docket Text: (DFT'S SUPPLEMENT TO) COUNT IV OF PLT'S COMPLAINT.

12	ORD - ORDER		
Filing Date:	10-DEC-2008		
Filing Party:			
Disposition Amount:			
Docket Text:	ON DFT'S MOTION TO DISMISS....GRANTED IN PART & DENIED IN PART.....VIEW ORDER. D E FRENCH.		
13	REQP - REQUEST TO PRODUCE		
Filing Date:	11-DEC-2008		
Filing Party:	EPSTEIN, JEFFREY		
Disposition Amount:			
Docket Text:	(DFT'S FIRST) TO PLT.		
14	NOS - NOTICE OF SERVICE		
Filing Date:	11-DEC-2008		
Filing Party:	EPSTEIN, JEFFREY		
Disposition Amount:			
Docket Text:	FIRST SET OF INTERROGATORIES DIRECTED TO PLT.		
15	NOUN - NOTICE OF UNAVAILABILITY		
Filing Date:	23-DEC-2008		
Filing Party:	M, L		
Disposition Amount:			
Docket Text:	FROM 2/23/09 THROUGH 2/27/09 AMD FROM 5/14/09 THROUGH 5/18/09.		
16	CMP - COMPLAINT		
Filing Date:	29-DEC-2008		
Filing Party:	M, L		
Disposition Amount:			
Docket Text:	(AMENDED) AS TO SARAH KELLEN.		
17	MEXT - MOTION FOR EXTENSION OF TIME		
Filing Date:	30-DEC-2008		
Filing Party:	EPSTEIN, JEFFREY		
Disposition Amount:			

<b>Docket Text:</b>		TO RESPOND TO AMENDED COMPLAINT.
18	AGOR - AGREED ORDER	
<b>Filing Date:</b>	06-JAN-2009	
<b>Filing Party:</b>		
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	ON DFT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO AMENDED COMPLAINT, GRANTED. D E FRENCH.	
19	MDIS - MOTION TO DISMISS	
<b>Filing Date:</b>	13-JAN-2009	
<b>Filing Party:</b>	EPSTEIN, JEFFREY	
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	COUNT IV OF AMENDED COMPLAINT AND MOTION TO STRIKE	
20	NOAP - NOTICE OF APPEARANCE	
<b>Filing Date:</b>	16-JAN-2009	
<b>Filing Party:</b>	GOLDBERGER , ESQ, JACK A	
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	AS COUNSEL FOR DFT JEFFREY EPSTEIN.	
21	ORSH - ORDER SETTING HEARING	
<b>Filing Date:</b>	23-JAN-2009	
<b>Filing Party:</b>		
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	FOR 3/6/09 FROM 9:15 TO 9:30 AM. D E FRENCH.	
22	RESP - RESPONSE TO:	
<b>Filing Date:</b>	26-JAN-2009	
<b>Filing Party:</b>	M, L	
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	DFT'S MOTION TO DISMISS COUNT IV OF AMENDED COMPLAINT AND MOTION TO STRIKE.	
23	NOS - NOTICE OF SERVICE	
<b>Filing Date:</b>	26-JAN-2009	
<b>Filing Party:</b>	M, L	
<b>Disposition Amount:</b>		

<b>Docket Text:</b> OF PLT'S ANSWERS TO DFT'S INTERROGATORIES.	
24	SMIS - SUMMONS ISSUED
<b>Filing Date:</b>	20-FEB-2009
<b>Filing Party:</b>	KELLEN, SARAH
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	SM-09-040539
	RCPT - RECEIPT FOR PAYMENT
<b>Filing Date:</b>	24-FEB-2009
<b>Filing Party:</b>	M, L
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	A Payment of -\$10.00 was made on receipt CAMB284286.
25	RPRS - REPLY/RESPONSE
<b>Filing Date:</b>	25-FEB-2009
<b>Filing Party:</b>	EPSTEIN, JEFFREY
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	TO PLT'S RESPOSNE TO DFT'S MOTION TO DISMISS COUNT IV OF AMENDED COMPLAINT AND MOTION TO STRIKE.
26	MOT - MOTION
<b>Filing Date:</b>	17-MAR-2009
<b>Filing Party:</b>	EPSTEIN, JEFFREY
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	TO REASSIGN AND/OR TRANSFER
27	NOTD - NOTICE OF TAKING DEPOSITION
<b>Filing Date:</b>	20-MAR-2009
<b>Filing Party:</b>	EDWARDS, BRAD
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	OF JEFFREY EPSTEIN ON 04/30/09
28	NOH - NOTICE OF HEARING
<b>Filing Date:</b>	20-MAR-2009
<b>Filing Party:</b>	CRITTON JR , ESQ, ROBERT DEWEESE
<b>Disposition Amount:</b>	

<b>Docket Text:</b> ON 04/07/09	
29	ORD - ORDER
<b>Filing Date:</b>	20-MAR-2009
<b>Filing Party:</b>	
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	ON DFT'S MTN TO DISMISS CT IV OF PLTF'S AMENDED COMPLAINT-GRANTED AS STATED
30	NOS - NOTICE OF SERVICE
<b>Filing Date:</b>	23-MAR-2009
<b>Filing Party:</b>	M, L
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	OF PLT EXPERT WITNESS INTERGS TO DFT
31	RQAD - REQUEST FOR ADMISSIONS
<b>Filing Date:</b>	23-MAR-2009
<b>Filing Party:</b>	M, L
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	FIRST-
32	NOS - NOTICE OF SERVICE
<b>Filing Date:</b>	23-MAR-2009
<b>Filing Party:</b>	M, L
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	OF PLT FIRST SET OF INTERGS
33	REQ - REQUEST
<b>Filing Date:</b>	23-MAR-2009
<b>Filing Party:</b>	M, L
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	FIRST- FOR PRODUCTION TO DFT
34	MOT - MOTION
<b>Filing Date:</b>	26-MAR-2009
<b>Filing Party:</b>	EPSTEIN, JEFFREY
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	TO STAY AND OR CONTINUE ACTION...

35	NOTD - NOTICE OF TAKING DEPOSITION		
<b>Filing Date:</b>	30-MAR-2009		
<b>Filing Party:</b>	CRITTON JR , ESQ, ROBERT DEWEES		
<b>Disposition Amount:</b>			
<b>Docket Text:</b>	OF DOMINIQUE HYPPOLITE ON 04/28/09		
36	NNAC - NOTICE -NAME/ADDRESS CHANGE		
<b>Filing Date:</b>	06-APR-2009		
<b>Filing Party:</b>	M, L		
<b>Disposition Amount:</b>			
<b>Docket Text:</b>	AS TO COUNSEL		
37	ANAD - ANSWER & AFFIRMATIVE DEFENSES		
<b>Filing Date:</b>	07-APR-2009		
<b>Filing Party:</b>	EPSTEIN, JEFFREY		
<b>Disposition Amount:</b>			
<b>Docket Text:</b>	TO PLT AMENDED COMPLAINT		
38	MCMP - MOTION TO COMPEL		
<b>Filing Date:</b>	08-APR-2009		
<b>Filing Party:</b>	EPSTEIN, JEFFREY		
<b>Disposition Amount:</b>			
<b>Docket Text:</b>	none.		
39	MCMP - MOTION TO COMPEL		
<b>Filing Date:</b>	08-APR-2009		
<b>Filing Party:</b>	EPSTEIN, JEFFREY		
<b>Disposition Amount:</b>			
<b>Docket Text:</b>	none.		
40	ORD - ORDER		
<b>Filing Date:</b>	09-APR-2009		
<b>Filing Party:</b>			
<b>Disposition Amount:</b>			

<b>Docket Text:</b> ON MOTION TO REASSIGN IS DENIED D FRENCH	
41	NOF - NOTICE OF FILING
<b>Filing Date:</b>	14-APR-2009
<b>Filing Party:</b>	CRITTON JR , ESQ, ROBERT DEWESE
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	<i>none.</i>
	SRTN - SERVICE RETURN (ATTACHED)
<b>Filing Date:</b>	15-APR-2009
<b>Filing Party:</b>	KELLEN, SARAH
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	NOT SERVED
42	ORD - ORDER
<b>Filing Date:</b>	20-APR-2009
<b>Filing Party:</b>	
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	ON MTN TO TRANSFER-AAS STATED-DHAFELE
43	NOT - NOTICE
<b>Filing Date:</b>	20-APR-2009
<b>Filing Party:</b>	
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	OF REASSIGNMENT TO DIVISION AB
44	NOTD - NOTICE OF TAKING DEPOSITION
<b>Filing Date:</b>	06-MAY-2009
<b>Filing Party:</b>	
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	E W
45	MOT - MOTION
<b>Filing Date:</b>	07-MAY-2009
<b>Filing Party:</b>	EDWARDS, BRAD
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	FOR PROTECTIVE ORDER

46

MOT - MOTION

<b>Filing Date:</b> 07-MAY-2009	
<b>Filing Party:</b> EDWARDS, BRAD	
<b>Disposition Amount:</b>	
<b>Docket Text:</b> FORPROTECTIVE ORDER	
47	NOT - NOTICE
<b>Filing Date:</b> 11-MAY-2009	
<b>Filing Party:</b> EPSTEIN, JEFFREY	
<b>Disposition Amount:</b>	
<b>Docket Text:</b> OF PROPOUNDING EXPERT INTERROGATORIES TO PLT.	
48	RESP - RESPONSE TO:
<b>Filing Date:</b> 14-MAY-2009	
<b>Filing Party:</b> M, L	
<b>Disposition Amount:</b>	
<b>Docket Text:</b> IN OPPOSITION OT DFT MOTION...	
49	ORSH - ORDER SETTING HEARING
<b>Filing Date:</b> 14-MAY-2009	
<b>Filing Party:</b>	
<b>Disposition Amount:</b>	
<b>Docket Text:</b> FOR 5/29/09. D HAFELE.	
50	NOH - NOTICE OF HEARING
<b>Filing Date:</b> 15-MAY-2009	
<b>Filing Party:</b>	
<b>Disposition Amount:</b>	
<b>Docket Text:</b> 6/4/09 8:45AM	
51	NOH - NOTICE OF HEARING
<b>Filing Date:</b> 18-MAY-2009	
<b>Filing Party:</b> CRITTON JR , ESQ, ROBERT DEWESE	
<b>Disposition Amount:</b>	
<b>Docket Text:</b> 6/10/09	
52	NOH - NOTICE OF HEARING

Filing Date:	18-MAY-2009
Filing Party:	CRITTON JR , ESQ, ROBERT DEWESE
Disposition Amount:	
Docket Text:	5/28/09
53	NOH - NOTICE OF HEARING
Filing Date:	18-MAY-2009
Filing Party:	CRITTON JR , ESQ, ROBERT DEWESE
Disposition Amount:	
Docket Text:	6/2/09
54	NOH - NOTICE OF HEARING
Filing Date:	18-MAY-2009
Filing Party:	CRITTON JR , ESQ, ROBERT DEWESE
Disposition Amount:	
Docket Text:	6/9/09
55	RESP - RESPONSE TO:
Filing Date:	18-MAY-2009
Filing Party:	EPSTEIN, JEFFREY
Disposition Amount:	
Docket Text:	AND OBJECTIONS TO PLT FIRST REQ FOR PRODUCTION
56	ANS - ANSWER
Filing Date:	18-MAY-2009
Filing Party:	EPSTEIN, JEFFREY
Disposition Amount:	
Docket Text:	AND OBJECTIONS TO PLT INTERGS
57	RESP - RESPONSE TO:
Filing Date:	18-MAY-2009
Filing Party:	EPSTEIN, JEFFREY
Disposition Amount:	
Docket Text:	AND OBJECTIONS TO PLT INTERGS
58	ANS - ANSWER
Filing Date:	18-MAY-2009
Filing Party:	EPSTEIN, JEFFREY

<b>Disposition Amount:</b>	
<b>Docket Text:</b>	TO PLT REQ FOR ADMISSIONS
59	NOF - NOTICE OF FILING
<b>Filing Date:</b>	21-MAY-2009
<b>Filing Party:</b>	EPSTEIN, JEFFREY
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	none.
60	NOF - NOTICE OF FILING
<b>Filing Date:</b>	22-MAY-2009
<b>Filing Party:</b>	CRITTON JR , ESQ, ROBERT DEWESE
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	PLTF'S ANSWERS
61	SUP - SUPPLEMENT
<b>Filing Date:</b>	26-MAY-2009
<b>Filing Party:</b>	
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	BRIEF IN SUPPORT OF MOTION FOR PROTECTIVE ORDER
62	MOT - MOTION
<b>Filing Date:</b>	27-MAY-2009
<b>Filing Party:</b>	M, L
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	TO DISQUALIFY TRIAL JUDGE
63	RPRS - REPLY/RESPONSE
<b>Filing Date:</b>	28-MAY-2009
<b>Filing Party:</b>	EPSTEIN, JEFFREY
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	IN OPPOSITION TO PLTF MOTION TO DISQUALIFY
64	NOS - NOTICE OF SERVICE
<b>Filing Date:</b>	10-JUN-2009
<b>Filing Party:</b>	EDWARDS, BRAD
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	none.

ORDER		
12-JUN-2009		
DENIED. D HAFELE.		
MOTION		
24-JUN-2009		
M, L		
FOR LEAVE TO ADD COUNT FOR BATTERY AND SEEK PUNITIVE DAMAGES.		
NOTICE OF HEARING		
25-JUN-2009		
CRITTON JR , ESQ, ROBERT DEWESE		
ON 7/7/09.		
NOTICE		
29-JUN-2009		
none.		
ORDER		
01-JUL-2009		
ON MTN TO COMPEL-MTN IS MOOT SEE ORDER		
- AGREED ORDER		
01-JUL-2009		
ON DFT'S MTN TO COMPEL-GRANTED		
- AGREED ORDER		

65	ORD
<b>Filing Date:</b>	
<b>Filing Party:</b>	
<b>Disposition Amount</b>	
<b>Docket Text:</b>	
66	MOT
<b>Filing Date:</b>	
<b>Filing Party:</b>	
<b>Disposition Amount</b>	
<b>Docket Text:</b>	
67	NOH
<b>Filing Date:</b>	
<b>Filing Party:</b>	
<b>Disposition Amount</b>	
<b>Docket Text:</b>	
68	NOT
<b>Filing Date:</b>	
<b>Filing Party:</b>	
<b>Disposition Amount</b>	
<b>Docket Text:</b>	
69	ORD
<b>Filing Date:</b>	
<b>Filing Party:</b>	
<b>Disposition Amount</b>	
<b>Docket Text:</b>	
70	AGOR
<b>Filing Date:</b>	
<b>Filing Party:</b>	
<b>Disposition Amount</b>	
<b>Docket Text:</b>	
71	AGOR

Filing Date:	01-JUL-2009
Filing Party:	
Disposition Amount:	
Docket Text:	ON DFT'S MTN TO COMPEL
72	ORD - ORDER
Filing Date:	01-JUL-2009
Filing Party:	
Disposition Amount:	
Docket Text:	ON NON-PARTY'S MTN FOR PROTECTIVE ORDER-AS IN ORDER
73	ORSH - ORDER SETTING HEARING
Filing Date:	09-JUL-2009
Filing Party:	
Disposition Amount:	
Docket Text:	ON 10/02/09
74	ORSH - ORDER SETTING HEARING
Filing Date:	13-JUL-2009
Filing Party:	
Disposition Amount:	
Docket Text:	ON 07/16/09
75	RESP - RESPONSE TO:
Filing Date:	14-JUL-2009
Filing Party:	CRITTON JR , ESQ, ROBERT DEWEESE
Disposition Amount:	
Docket Text:	TO MTN FOR LEAVE
76	MCMP - MOTION TO COMPEL
Filing Date:	14-JUL-2009
Filing Party:	CRITTON JR , ESQ, ROBERT DEWEESE
Disposition Amount:	
Docket Text:	none.
77	NOF - NOTICE OF FILING
Filing Date:	16-JUL-2009

<b>Filing Party:</b>	EPSTEIN, JEFFREY
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	ATTACHED.
78	ORD - ORDER
<b>Filing Date:</b>	16-JUL-2009
<b>Filing Party:</b>	
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	ON DFT'S MTN TO COMPEL-SEE ORDER
79	NOT - NOTICE
<b>Filing Date:</b>	17-JUL-2009
<b>Filing Party:</b>	GOLDBERGER , ESQ, JACK A
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	none.
80	NOF - NOTICE OF FILING
<b>Filing Date:</b>	17-JUL-2009
<b>Filing Party:</b>	EPSTEIN, JEFFREY
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	EXHIBIT A
81	NOH - NOTICE OF HEARING
<b>Filing Date:</b>	21-JUL-2009
<b>Filing Party:</b>	EDWARDS, BRAD
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	ON 7/31/09.
82	NOF - NOTICE OF FILING
<b>Filing Date:</b>	22-JUL-2009
<b>Filing Party:</b>	CRITTON JR , ESQ, ROBERT DEWESE
<b>Disposition Amount:</b>	
<b>Docket Text:</b>	none.
83	NOF - NOTICE OF FILING
<b>Filing Date:</b>	28-JUL-2009
<b>Filing Party:</b>	EPSTEIN, JEFFREY
<b>Disposition Amount:</b>	

<b>Docket Text:</b>		ATTACHED.
84	ORD - ORDER	
<b>Filing Date:</b>	31-JUL-2009	
<b>Filing Party:</b>		
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	ON MTN FOR LEAVE -GRANTED	
85	NOH - NOTICE OF HEARING	
<b>Filing Date:</b>	10-AUG-2009	
<b>Filing Party:</b>	EDWARDS, BRAD	
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	ON 8/20/09.	
86	MOT - MOTION	
<b>Filing Date:</b>	10-AUG-2009	
<b>Filing Party:</b>	M, L	
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	FOR STAY OF JUNE 30, 2009 ORDERS.	
87	REQ - REQUEST	
<b>Filing Date:</b>	12-AUG-2009	
<b>Filing Party:</b>	M, L	
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	FOR PRODUCTION	
88	NOH - NOTICE OF HEARING	
<b>Filing Date:</b>	13-AUG-2009	
<b>Filing Party:</b>	CRITTON JR , ESQ, ROBERT DEWESE	
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	none.	
89	MCMP - MOTION TO COMPEL	
<b>Filing Date:</b>	13-AUG-2009	
<b>Filing Party:</b>	EPSTEIN, JEFFREY	
<b>Disposition Amount:</b>		
<b>Docket Text:</b>	COMPLIANCE. . .	

<b>Filing Date:</b> 13-AUG-2009	
<b>Filing Party:</b> EPSTEIN, JEFFREY	
<b>Disposition Amount:</b>	
<b>Docket Text:</b> IN OPPOSITION . . .	
91	NPNP - NOTICE OF PRODUCTION NON PARTY
<b>Filing Date:</b> 17-AUG-2009	
<b>Filing Party:</b> EDWARDS, BRAD	
<b>Disposition Amount:</b>	
<b>Docket Text:</b> none.	
92	NOTD - NOTICE OF TAKING DEPOSITION
<b>Filing Date:</b> 17-AUG-2009	
<b>Filing Party:</b>	
<b>Disposition Amount:</b>	
<b>Docket Text:</b> OF WILLIAM "BILL" RILEY.	
93	NPNP - NOTICE OF PRODUCTION NON PARTY
<b>Filing Date:</b> 17-AUG-2009	
<b>Filing Party:</b> EDWARDS, BRAD	
<b>Disposition Amount:</b>	
<b>Docket Text:</b> none.	
94	NPNP - NOTICE OF PRODUCTION NON PARTY
<b>Filing Date:</b> 17-AUG-2009	
<b>Filing Party:</b> EDWARDS, BRAD	
<b>Disposition Amount:</b>	
<b>Docket Text:</b> none.	
95	NPNP - NOTICE OF PRODUCTION NON PARTY
<b>Filing Date:</b> 17-AUG-2009	
<b>Filing Party:</b> EDWARDS, BRAD	