

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80119-MARRA-JOHNSON

JANE DOE NO. 2,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

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**DEFENDANT JEFFREY EPSTEIN'S RESPONSES AND OBJECTIONS**  
**TO PLAINTIFF'S NET WORTH INTERROGATORIES**  
**DATED JUNE 29, 2009**

Defendant, JEFFREY EPSTEIN, by and through his undersigned attorneys, serves his answers and objections to Plaintiff's Net Worth Interrogatories, dated June 29, 2009 and states:

**Interrogatory No. 1:** State the fair market value of all assets in which Defendant has an ownership interest.

**Response and Objections to Interrogatory Number 1:** Defendant is asserting specific legal objections including but not limited to relying on certain U.S. constitutional privileges in declining at present to respond to this request for production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential, proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time

**EXHIBIT "B"**

PLAINTIFF  
JUN 29 2009

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period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for a time period from January 1, 2002 to present. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

Responding to the above financial request would require Epstein to identify information regarding the offenses that were the prior subject of a federal investigation as set forth in more detail in a supplementary response available to be provided to the court in camera and ex parte to the extent the good faith assertion of the privilege is in question. The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. This interrogatory, if answered, would require testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other relating inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including confidentiality), and should only be provided at the very end of litigation but before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.

**Interrogatory No. 2:** Identify all financial statements or other documents from which net worth Interrogatory No. 1 was calculated.

**Response and Objections to Interrogatory Number 2:** Defendant is asserting specific legal objections including but not limited to relying on certain U.S. constitutional privileges in declining at present to respond to this request for production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

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In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential, proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to

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lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for a time period from January 1, 2002 to present. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

Responding to the above financial request would require Epstein to identify information regarding the offenses that were the prior subject of a federal investigation as set forth in more detail in a supplementary response available to be provided to the court in camera and ex parte to the extent the good faith assertion of the privilege is in question. The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. This interrogatory, if answered, would require testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other relating inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including confidentiality), and should only be provided at the very end of litigation but before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.

**Interrogatory No. 3:** State gross liabilities, expenses, and other offsets to net worth, and identify all documents from which such items were calculated or determined.

**Response and Objections to Interrogatory Number 3:** Defendant is asserting specific legal objections including but not limited to relying on certain U.S. constitutional privileges in declining at present to respond to this request for production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential,

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proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for a time period from January 1, 2002 to present. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

Responding to the above financial request would require Epstein to identify information regarding the offenses that were the prior subject of a federal investigation as set forth in more detail in a supplementary response available to be provided to the court in camera and ex parte to the extent the good faith assertion of the privilege is in question. The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. This interrogatory, if answered, would require testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other relating inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including confidentiality), and should only be provided at the very end of litigation but before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.

**Interrogatory No. 4:** List all real property, by legal description and/or street address, in which Defendant holds an ownership interest, and state for each the title holder of the property shown in the public records, and identify the nature and extent of Defendant's ownership.

**Response and Objections to Interrogatory Number 4:** Defendant is asserting specific legal objections including but not limited to relying on certain U.S. constitutional privileges in declining at present to respond to this request for production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

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In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential, proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for a time period from January 1, 2002 to present. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

Responding to the above financial request would require Epstein to identify information regarding the offenses that were the prior subject of a federal investigation as set forth in more detail in a supplementary response available to be provided to the court in camera and ex parte to the extent the good faith assertion of the privilege is in question. The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. This interrogatory, if answered, would require testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other relating inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including confidentiality), and should only be provided at the very end of litigation but before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.

**Interrogatory No. 5:** List all corporations, partnerships and other business entities in which Defendant has an ownership interest or had no ownership in the past five (5) years. As to each entity, list the address and nature of the business, and the Defendant's ownership interest.

**Response and Objections to Interrogatory Number 5:** Defendant is asserting specific legal objections including but not limited to relying on certain U.S. constitutional privileges in declining at present to respond to this request for production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference

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under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential, proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for the past five (5) years. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

Responding to the above financial request would require Epstein to identify information regarding the offenses that were the prior subject of a federal investigation as set forth in more detail in a supplementary response available to be provided to the court in camera and ex parte to the extent the good faith assertion of the privilege is in question. The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. This interrogatory, if answered, would require testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other relating inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including confidentiality), and should only be provided at the very end of litigation but before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.

**Interrogatory No. 6:** Identify all firms or companies which have performed property appraisals of Defendant's assets in the past five (5) years.

**Response and Objections to Interrogatory Number 6:** Defendant is asserting specific legal objections including but not limited to relying on certain U.S. constitutional privileges in declining at present to respond to this request for production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments

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as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential, proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for the past five (5) years. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

Responding to the above financial request would require Epstein to identify information regarding the offenses that were the prior subject of a federal investigation as set forth in more detail in a supplementary response available to be provided to the court in camera and ex parte to the extent the good faith assertion of the privilege is in question. The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. This interrogatory, if answered, would require testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other relating inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including confidentiality), and should only be provided at the very end of litigation but before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.

**Interrogatory No. 7:** List all cars, boats, airplanes and other modes of transportation in which Defendant has an ownership interest. As to each, list the year, make and model, the appraised value, and the percent of Defendant's ownership interest.

**Response and Objections to Interrogatory Number 7:** Defendant is asserting specific legal objections including but not limited to relying on certain U.S. constitutional privileges in declining at present to respond to this request for production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition

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without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential, proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for a time period from January 1, 2002 to present. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

Responding to the above financial request would require Epstein to identify information regarding the offenses that were the prior subject of a federal investigation as set forth in more detail in a supplementary response available to be provided to the court in camera and ex parte to the extent the good faith assertion of the privilege is in question. The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. This interrogatory, if answered, would require testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other relating inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including confidentiality), and should only be provided at the very end of litigation but before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.

**Interrogatory No. 8:** Identify all persons, firms and companies which have performed tax or accounting related functions for Defendant in the past ten (10) years.

**Response and Objections to Interrogatory Number 8:** Defendant is asserting specific legal objections including but not limited to relying on certain U.S. constitutional privileges in declining at present to respond to this request for

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production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential, proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for the past ten (10) years. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

Responding to the above financial request would require Epstein to identify information regarding the offenses that were the prior subject of a federal investigation as set forth in more detail in a supplementary response available to be provided to the court in camera and ex parte to the extent the good faith assertion of the privilege is in question. The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. This interrogatory, if answered, would require testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other relating inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including confidentiality), and should only be provided at the very end of litigation but before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.

**Interrogatory No. 9:** Identify all employees of Defendant whose duties or functions include accounting, bookkeeping or financial planning.

**Response and Objections to Interrogatory Number 9:** Defendant is asserting specific legal objections including but not limited to relying on certain

U.S. constitutional privileges in declining at present to respond to this request for production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential, proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for a time period from January 1, 2002 to present. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

Responding to the above financial request would require Epstein to identify information regarding the offenses that were the prior subject of a federal investigation as set forth in more detail in a supplementary response available to be provided to the court in camera and ex parte to the extent the good faith assertion of the privilege is in question. The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. This interrogatory, if answered, would require testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other relating inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including confidentiality), and should only be provided at the very end of litigation but before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.

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**Interrogatory No. 10:** Identify any and all transfers of assets or property made by you or for which you signed any document or otherwise authorized, from January 1, 2006 to present.

**Response and Objections to Interrogatory Number 10:** Defendant is asserting specific legal objections including but not limited to relying on certain U.S. constitutional privileges in declining at present to respond to this request for production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential, proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for a time period from January 1, 2006 to present. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

Responding to the above financial request would require Epstein to identify information regarding the offenses that were the prior subject of a federal investigation as set forth in more detail in a supplementary response available to be provided to the court in camera and ex parte to the extent the good faith assertion of the privilege is in question. The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. This interrogatory, if answered, would require testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other relating inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including confidentiality), and should only be provided at the very end of litigation but before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.

**Interrogatory No. 11:** Identify all foreign firms, companies and trusts in which you have an ownership interest.

**Response and Objections to Interrogatory Number 11:** Defendant is asserting specific legal objections including but not limited to relying on certain U.S. constitutional privileges in declining at present to respond to this request for production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential, proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for a time period from January 1, 2002 to present. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

Responding to the above financial request would require Epstein to identify information regarding the offenses that were the prior subject of a federal investigation as set forth in more detail in a supplementary response available to be provided to the court in camera and ex parte to the extent the good faith assertion of the privilege is in question. The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. This interrogatory, if answered, would require testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other relating inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

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To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including confidentiality), and should only be provided at the very end of litigation but before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.

**Interrogatory No. 12:** Identify all firms or institutions in which Defendant has maintained an investment, brokerage, savings and/or trust account in the past five (5) years.

**Response and Objections to Interrogatory Number 12:** Defendant is asserting specific legal objections including but not limited to relying on certain U.S. constitutional privileges in declining at present to respond to this request for production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential, proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information for the past five (5) years. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

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To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including confidentiality), and should only be provided at the very end of litigation but

before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.

**Interrogatory No. 13:** Identify all current employment and other sources of income from 2008 to present.

**Response and Objections to Interrogatory Number 13:** Defendant is asserting specific legal objections including but not limited to relying on certain U.S. constitutional privileges in declining at present to respond to this request for production based on advice from my counsel that I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth Amendment and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable and would therefore violate the Constitution.

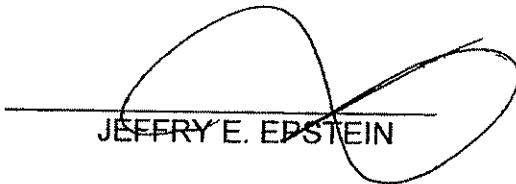
In addition to and without waiving his constitutional privileges, Defendant also objects as the interrogatory is unreasonable, overbroad, confidential, proprietary in nature and seeks information that is neither relevant to the subject matter of the pending action nor does it appear to be reasonably calculated to lead to the discovery of admissible evidence. Plaintiff's Complaint alleges a time period of "in or about 2004-2005." Plaintiff's interrogatory seeks information from 2008 to present. The information sought is also privileged and confidential, and inadmissible pursuant to the terms of the NPA and, Fed. Rule of Evidence 410 and 408, and Fla. Stat. 90.410.

Responding to the above financial request would require Epstein to identify information regarding the offenses that were the prior subject of a federal investigation as set forth in more detail in a supplementary response available to be provided to the court in camera and ex parte to the extent the good faith assertion of the privilege is in question. The Fifth Amendment is a safe harbor for all citizens, including those who are innocent of any underlying offense. This interrogatory, if answered, would require testimonial communications from Epstein regarding his financial status and history and would require him to waive his right to decline to respond to other inquiries related to the same subject matter. Responding to this and other relating inquiries would have the potential to provide a link in a chain of information and/or leads to other evidence or witnesses that would have the specific risk of furthering an investigation against him and therefore are protected from compulsion by Epstein's constitutional privilege.

To the extent this court rules that some or all of the requested information be provided, it should not be provided without limitations (including

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confidentiality), and should only be provided at the very end of litigation but before trial in order for Plaintiff to establish her burden making it apparent that punitive damages can be awarded.



JEFFREY E. EPSTEIN

STATE OF FLORIDA )  
COUNTY OF PALM BEACH )

I hereby certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Jeffrey E. Epstein, known to me to be the person described in and who executed the foregoing Interrogatories who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above-named person: personally known/identification, and that an oath was/was not taken.

WITNESS my hand and official seal in the County and State last aforesaid this 31 day of August, 2009.

NAME:

(SEAL)

Expires: 04/19/2013PRINT JESSICA CADWELLNotary Public/State of Florida  
Commission #: DD853529

My Commission



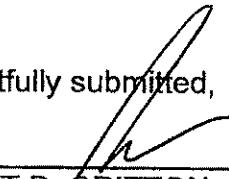
**Certificate of Service**

WE HEREBY CERTIFY that a true copy of the foregoing has been sent via U.S. Mail and facsimile to the following addressees this 5 day of August, 2009.

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Respectfully submitted,

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