

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Related Cases:

08-80232, 08-80380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092,

AFFIDAVIT OF JESSICA ARBOUR

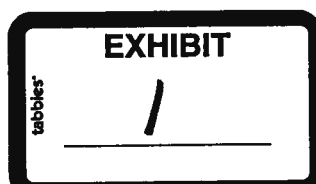
STATE OF FLORIDA)
) SS:
COUNTY OF MIAMI-DADE)

Jessica Arbour deposes and states as follows:

1. My name is Jessica Arbour. I am an attorney at Mermelstein & Horowitz, P.A., the law firm representing Jane Doe Nos. 2-7.

2. On or about March 12, 2010, I spoke with FBI Paralegal Specialist Deborah Moore at the FBI's North Miami Beach office. I informed her that I wanted to get copies of the sworn statements our clients gave to FBI investigators during the federal investigation of Jeffrey Epstein, and that I needed instructions from her as to the proper procedure.

3. Ms. Moore informed me that it was a three-step process: First, I should serve the FBI with a subpoena listing the specific statements I wanted. Second, I should provide them



with a "compliance letter" that stated the reasons I was requesting the information in order to comply with the Privacy Act. Third, I would need to provide either a signed, notarized authorization from each of my clients waiving their rights under the Privacy Act or an Order from this Court ordering the FBI to comply with the subpoena.


4. On March 12, 2010, Plaintiffs served a subpoena duces tecum, attached to the original Motion as Exhibit 1, for our clients' statements.

5. On March 16, 2010, I received a letter from FBI General Counsel Frank Navas confirming that the FBI had received my subpoena and that they would await an Order from this Court or the signed authorizations from each of the Plaintiffs before producing the requested documents. I had previously informed him that I would seek an Order from this Court.

6. Given that discovery deadlines are approaching, a Motion was filed with this Court seeking a single Court Order applicable to all of the statements because Plaintiff's counsel believes that is the most efficient and timely means of obtaining the Plaintiffs' statements.

FURTHER AFFIANT SAYETH NAUGHT.

Dated: April 12, 2010




Jessica Arbour

BEFORE ME, personally appeared Jessica D. Arbour who after being first duly sworn, deposes and states that he has executed the foregoing Affidavit, and that it is correct to the best of his knowledge and belief.

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 12 day of April, 2010.





NOTARY PUBLIC,
STATE OF FLORIDA