

Armed

VEHICLES

Mercedes Benz 600 2001 Black <i>Gone to NYC</i> Lic: U90-BQL To 198	(561) 309-6415 Rear (561) 379-9390 Front <i>Halkin by Dog</i>	Mercedes Benz of Palm Beach 4000 Okeechobee Boulevard West Palm Beach, FL 33409 Att: Shawn Adison Tel: (561) 689-6363
Mercedes Benz 600 1997 Black Licence: G14KCT	(561) 758-1672 Rear (561) 818-8867 Front	
Mercedes Benz 600 Conv 1998 Silver Licence: RAS85L <i>Gone</i>	(561) 346-7141	<i>Paint WORK & Body Shop</i> <i>Coach WORK</i> <i>Contact Dominique</i> [REDACTED]
Suburban 2001 Black <i>Gone</i> Licence: WGE53R <i>No/10</i>	(561) 371-1686	Roger Dean Chevrolet 2235 Okeechobee Boulevard West Palm Beach, FL 33409 Tel: (561) 683-8100
Crysler Mini Van 1996 White Licence: WGE52R <i>Gone</i>	(561) 308-5700	Nestor Auto Repairs 2600 Florida Avenue West Palm Beach, FL 33401 Tel: (561) 835-0809
Cobra Grand 1993 Green C97CRJ <i>VNTG Green</i>		Nestor Auto Repairs 2600 Florida Avenue West Palm Beach, FL 33401 Tel: (561) 835-0809
Volvo 1998 Gold Mrs Epstein	(561) 686-3707	Volvo Palm Beach 5544 Okeechobee Boulevard West Palm Beach, FL 33417 Tel: (561) 471-7600
Oil Well	900 Southern Boulevard West Palm Beach, FL 33405 Tel: (561) 835-9374	Oil change every 3 000 miles

Registration, insurance and yearly inspection papers to be kept in the glove compartment of each vehicle
 Spare keys are kept in the key box in the office

Muvico Parisian	City Place 545 Hibiscus Street West Palm Beach, FL 33401 Tel: (561) 833-0400	
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GROCERY STORES

Bishop Water Co	Tel: (561) 582-1367 <i>Shawn</i>	Lunen bottled water (large and small)
Carmine Giardini's	2401 PGA Boulevard, Suite 172 Palm Beach Gardens, FL 33410 Tel: (561) 775-0105 Fax (561) 775-9233	Fish, meat, gourmet foods 
C'est Si Bon	280 Sunset Avenue Palm Beach, FL 33480 Tel: (561) 659-6503	Gourmet foods
Publix Super Market	265 Sunset Avenue Palm Beach, FL 33480 Tel: (561) 655-4120	General, cleaning, toiletries
Wild Oats	7735 South Dixie Highway West Palm Beach, FL 33405 Tel: (561) 585-8800	Health Foods

HEALTH & BEAUTY

Pharmacy	Greens Pharmacy 151 North County Road Palm Beach, FL 33480 Tel: (561) 832-4443	
	Lewis Pharmacy 235 South County Road Palm Beach, FL 33480 Tel: (561) 655-7867	

UTILITIES

Water	City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461 Tel: (561) 965-5770	Water shut-off for entire property is located next to the mailbox on the sidewalk.
Electricity	Florida Power and Light General Mailing Facility Miami, FL 33188-0001 Tel: (561) 697-8000	
Gas	Florida Gas Company 401 South Dixie Highway West Palm Beach, FL 33401 Tel: (561) 832-0872	
Sewer	City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461 Tel: (561) 965-5770	
Trash Removal	City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461 Tel: (561) 965-5770 - Water Dept (561) 965-4022 Trash Removal	Daily (Monday -Friday) Recyclables (Thurs before Noon)
Telephone	ETC 2921 N Australian Avenue West Palm Beach, FL 33407 Tel: (561) 881-8118	
	Bell South Tel: (561) 780-2611	

Plumber <i>GENERAL PLUMBING 561-585-2591</i>	Foster Plumbing 2800 Westgate Avenue West Palm Beach, FL 33409 Tel: (561) 686-1721	General plumbing repairs
	Roto Rooter 6600 NW 12th Avenue, Suite 213 Fort Lauderdale, FL 33309 Tel: (561) 832-1495	Blocked drains
Pool	Hackl Pools 1331 Central Terrace Lake Worth, FL 33460 Tel: (561) 588-7493 <i>Valerie</i>	Monday and Thursday at 10:30am Clean pool, filter, add salt <i>(Mitchell)</i> [REDACTED]
Tree Trimming	County Wide Tree Service Tel: (561) 371-5786	First Monday in May and November

STORAGE

Storage USA	5580 Okeechobee Boulevard West Palm Beach, FL 33417 Tel: (561) 683-9955	10 ft x 20 ft unit available
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VEHICLES

Car Detailing	Palm Beach Wash & Auto Detail 1220 N. Dixie Highway (at Amoco Gas) Tel: (561) 835-8748 <i>George</i> <i>Clean CAR SERVICES</i> [REDACTED]	
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1220 N. Dixie Hwy
Boynton Beach FL
33426

G.G.
724 SW 1st Av.
Boynton Beach, FL
3

MAIL & DELIVERY SERVICES

FedEx	1-800-463-3339	Account No: [REDACTED] Drop-off box is next to Palm Beach National Bank on Worth Avenue
Post Office	401 South County Road West Palm Beach, FL Tel: (561) 832-0697	

MAINTENANCE

Air Conditioning	Cassidy Air Conditioning 501 Fern Street West Palm Beach, FL 33401 Tel: (561) 833-6331	Monthly service contract First Monday of every month - Keny [REDACTED] <i>b/c Payee</i> - Bob (Technician) Bob (Filter Service)
Awnings	American Awning Company 537 Pine Terrace West Palm Beach, FL 33405 Tel: (561) 832-7123	<i>Car?</i>
Cable Service	Adelphia Cable 1401 North Point Parkway West Palm Beach, FL 33407 Tel: (561) 478-8300	<i>Car?</i>
Carpenter	Tel: [REDACTED]	Erwin Ray <i>Car?</i>
Carpet Cleaners	Stanley Steamers Tel: (561) 586-5700	Wall to wall <i>2-Cab</i>
	Merry Rugs Tel: (561) 588-8588	Loose rugs
Computers	Bloomberg 499 Park Avenue New York, NY 10022 Tel: (212) 318-2100	Palm Beach consultants: Chad Bonta Peter Kapopoulos Tel: [REDACTED] <i>Changed</i>

TRAVEL

Pilots	Larry Visoski ✓	[REDACTED]
	Dave Rodgers	[REDACTED]
	Larry Morrison	[REDACTED]
Mr Epstein's planes	Jet Aviation	(561) 233-7241 Procedure for leaving cars at the airport: Leave car at Jet Aviation landing strip Leave the keys in the car Advise Jet Aviation Tail #909JE or Tail #908JE They will tag and pull car to plane upon arrival
Ms Maxwell's plane	Raytheon <i>Changed to</i> <i>Fly Options</i>	1-888-835-9782 Contract No: Air 4 Tail # ...TA <i>970 QJ</i> Always a Beech Jet or Hawker
Commercial Airlines	Air France American British Airways Continental Delta South African Airways United US Air	1-800-237-2747 1-800-433-7300 1-800-247-9297 1-800-525-0280 1-800-221-1212 1-800-722-9675 1-800-241-6522 1-800-428-4322

- Carlos Ruiz Handyman (561)

→ Colonial Bank /worth Ave.
 ~ Ben Levin
 ~ Leonor

BANKING

Household Banking Account	Palm Beach National Bank 125 Worth Avenue Palm Beach, FL 33480 Tel: (561) 653-5594	Account No: [REDACTED] Send to Eric Gany for reconciliation \$1,000 Petty Cash Float
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BICYCLES

Bicycles	Palm Beach Bicycle Trail Shop 223 Sunrise Avenue Palm Beach, FL 33480 Tel: (561) 659-4583	Mongoose Crossway 450 Raleigh Aluminium 300 Mercedes Benz Cignal Sports Bike Schwinn World Huffy Santa Fe Raleigh Sport Scott Boston
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BOOKSTORES

Newspapers	Publix Super Market 265 Sunset Avenue Palm Beach, FL 33480 Tel: (561) 655-4120	
Magazines	Main Street News 255 Royal Poinciana Way Palm Beach, FL 33480 Tel: (561) 833-4027	

CLEANING SERVICE

Francis Peadon House Cleaning Services	[REDACTED]	Every Tuesday and Wednesday 8:00am - 4:00pm (Francis and Pastora Peadon)
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INMENT

The Breakers	One South County Road Palm Beach, FL 33480 Tel: (561) 655-6611	Renew car park stickers every September
Comedy Corner	2000 South Dixie Highway West Palm Beach, FL 33401 Tel: (561) 833-1812	
The Mar-a-Lago Club	1100 South Ocean Boulevard Palm Beach, FL 33480 Tel: (561) 832-2600	

Sem Co. System (561) 715-4832 Sam

Electrician	Energy Efficient Electric Tel: (561) 655-7211	Charged
Exterminator	Palm Beach Exterminating Tel: (561) 689-0808	Contact is Ken First Monday of every month at 10:30am Also use for termite tent
Garden Service	Alan Stopek Efflorescence [REDACTED] Trace [REDACTED] Wellington, FL 33414 [REDACTED]	
	Jerome Pierre [REDACTED]	Part-time help. Billed through Alan Stopek. In residence: Daily from 6:30am Not in residence: Mon - Fri from 2pm - 5pm Also maintains Mrs Epstein's property on Saturday mornings.
Garage Doors	The Doorsmith 4160 NW First Avenue Boca Raton, FL 33431 Tel: (561) 391-7768	
Gates	Reich Metal Fabricators Tel: (561) 585-3173	Tom John Back door gate switch - above garage door controls. When open, round red light is on. Front door gate switch - in telephone outlet above the kitchen telephone
Irrigation	Dolphin Sprinkler Inc Tel: (561) 844-8082	Janet Alan Bontz
Landscape Spraying	Academy Services Tel: (561) 478-4629	Arrange through Alan Stopek
Locksmith	Wilson Rowan Locksmiths 625 South Dixie Highway West Palm Beach, FL 33401 Tel: (561) 655-3637	
Painter	[REDACTED]	Bill Charged

Siberba (Sunrock)

Senh

* Adrienne

Adrien

* Stopek

- Bolz

- Benjamin
(State Dept)

* - Bruno

- Dave (Pilot)

- David (Cooly)

- Tomalico

* - George Martens Jr.

- Christine

- Holden

- Tom Luc (Kron Models)

* - Jorge Martens

- Larry (Pilot)

- Lenny (Electric)

- Miguel

Milko (Record)

Mom's

1.-

2.-

3.-

Senh

- Nedick

- Oman

P.B Staff

P.B House

P.B Fax (

P.I. (305) 70

Address / Telephone Sheet

Sarah's E Mail:

358 El Brillo Way, Palm Beach Fl, 33480

Name	Address	Telephone/Fax
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Mr. Jeffrey Epstein (NYSG LLC) Office
457, Madison Avenue 4th Floor
New York, NY 10021.

Email

Leslie
✓ Jean (Schr)
Helen Fox

Ms. Ghislaine Maxwell Email

Accountants

- Eric Gany
EMAD HANNA (St.Rep.) Email Email
- Bella Klein-Accountants
(Petty Cash Rep.) Email

Leslie Groff (JE Sec) Email
Cecelia Email
Helan Kim Email
Michelle Compes
Jenn Doyle

Property

Keith Blumberg Email

Engineer

Richard Barnett
DOUG SCHOTTELLE
Architach
Computers
Mark Lumberg

(212) 242-4113 D.

(212) 717-4672 F.

Deutsche Bank

at inService?

Residences of Mr. Jeffrey Epstein9 East 71st Street,
New York NY 10021

Mr. Jeffrey Epstein

Ms. Ghislaine Maxwell

StaffHouse Manager Jojo
House Manger LynnStaff Phone

Chef Brent Tindall

*Home Depot
478-0783 Mon*

Palm Beach Contractors

General Plumbing

Customer Service representative Amy 561 585 2591

Electrical

Reel Power Inc Lenny (electrician) 561 706 0827

Gates

Samco Systems Sam (owner) 561 719 4832

Service gate switch: above garage door controls, when round light is on

Front gate switch: just above the telephone outlet kitchen area

Garage doors

The Door Smith Inc Keith Kelly [REDACTED]

Telephones

Southern Bell (repairs) 561 780 2355

Internal Phone system (NEC)

Repair and Programming 561 881 8118

Alarm System

Benham Industries Inc Keith 854 491 4112

Locksmith

Wilson & Rowan 561 655 3637 [REDACTED]

A/C Maintenance

John C Cassidy 24 hr service [REDACTED]

Handyman

Carlos (carpenter) 4v.44 [REDACTED]

Landscape

Alan Stopeck [REDACTED]

Pest Control

Palm Beach Exterminator Kim 561 844 8082

Irrigation

Dolphin Sprinkle 561 478 4696

Pool Heating

National Pool Service When needed 561 585 8866

Pool Maintenance

Hack Pool Service Monday/ Thursday 561 588 7493

Tree Trimming

Country Wide Trees Twice, summer/winter 561 371 5786

Carpet Cleaners

Stanley Steamers wall to wall 561 586 5700

Merry Rug area rug 561 588 8588

Alarm - 754.

POST OFFICE

- 1.800.275.8777
 \$ 561.659.0261

(wed 1
8-12)

<u>Cable</u>		
Adelphia cable	Cable TV	561 468-8300 697.8473
<u>Bottled Water</u>	Avion water	561582 1367 1.888.683.1000
Bishop water company		
<u>Upholsterer</u>		
Frank Jennes		
<u>Gas</u>		
Gas Energy Inc (Joe Di Giovanni) all gas repairs)		561 963 0505
<u>Laundry equipment</u>		
May Tag		1800 622 4729
<u>Painter</u>	Contact Lenny	
Sam		
<u>Storage</u>		561 683 5835
Storage USA		
5580, Okeechobee Blvd		
Unit 6218		
<u>Grocery & General Household items</u>		
<u>General Grocery</u>		
Publix		561 655 4120
265, Sunset Ave		
<u>Gourmet food</u>		
C' est si bon		561 659 6503
289, Sunset Blvd		
<u>Carmines</u>		
2401 PGA Blvd Take 95 North to PGA Blvd		561 775 9233
Too Jays Gravelox/ Nova sliced salmon		561 655 6545
<u>Green Pharmacy</u>		
151., N County Road		561 832 4443
<u>Flowers</u>		
Extra touch Flowers		561 835 8000
<u>Hardware</u>		
Home Depot		561 832 0783
Sewell Hardware		561 832 7171
528, Clematis Street		
<u>Newspapers</u>		
Main Street News		
255, Royal Poinciana Way		561 833 4027
<u>Post Office</u>		
401, South County Road,		561 832 0697
<u>Car Detailing</u>	George	
<u>Taxi Service/Limo</u>	Dan Tischen	
FedEx	# 114420816 (Monday & Thursday)	1800 463 3339
<u>Recycling</u>	Every Thursday 6AM to 5PM	
<u>Trash collection</u>	M-F once a day Early Morning	
<u>Cars</u>		
Mercedes of Palm Beach		561 689 6393
Chevrolet		561 683 8100
Auto Repairs	Gray Sunoco 340 South County	561 655 6645
	Nestor Auto 2600, Florida Avenue	561 835 0809
Gasoline	Gray Sunoco	

ALL AMERICAN SHUTTERS

561.712.9882

[REDACTED]
Marina

* INTEL *

*

From Sgt Dan Szarzewski
[REDACTED] w/F > [REDACTED]

per Curtis



could talk w/ EPSTEIN KNOWS
him WELL. INFO passed on to Capt.

~~Per reengagement~~

- [REDACTED] [REDACTED]
- 12:50PM [REDACTED] -wants to talk to you @ something private
- [REDACTED] Friday
- 6/19 7:15 PM [REDACTED]
- 6/17 5:55 PM [REDACTED]
- 12:30 [REDACTED] has ~ Q For you- can you please call her
[REDACTED]
- 6/19 1020PM Jean Luc
- Signed Neiman Marcus 6/4/05 \$ 33.02 Amex [REDACTED] 01/06
- [REDACTED] will be here e 6:30 AM
- 6/19/05 1:00PM Jean Luc
- Four season [REDACTED] Waitt
- 6/18/05 6:40 [REDACTED]
- 914 [REDACTED]
- 6/19/05 [REDACTED] [REDACTED]
- TONYAWorld.com

Trans.

EXHIBIT 46

(Filed Under Seal)

SSA-1826

ITEMIZED STATEMENT OF EARNINGS

SOCIAL SECURITY ADMINISTRATION
EARNINGS RECORD INFORMATION

Date: 10/25/2016

Our records show the amount of earnings reported, not the amount of Social Security taxes that were paid.

Wages were first covered under Social Security in 1937. Therefore, 1937 is the first year for which earnings may be shown on our records. Employers were required to report earnings semi-annually in 1937, and on a quarterly basis for the years from 1938 through 1977. Beginning with 1978, employers are required to report earnings annually.

Our records do not show the exact date of employment (month and day) because we do not need this information to figure Social Security benefits. Employers do not give us this information.

Each year, there is a maximum amount of earnings that is subject to Social Security taxes and is used to compute benefits. If a person earns more than this maximum amount, the earnings statement will usually show the maximum rather than the total earnings. Maximum benefits can be found on the SSA website.
<http://www.ssa.gov/OACT/COLA/cbb.html>

Beginning in 1951, self-employed persons could also receive Social Security credit for their work. The maximum amounts of self-employment earnings that are subject to Social Security taxes and are used to compute benefits can also be found on the SSA website.
<http://www.ssa.gov/OACT/COLA/cbb.html>

If you have any questions, you should call, write, or visit any Social Security office. If you visit or call, please bring this letter. It will help us answer questions. The toll free number to call is 1-800-772-1213 (for the deaf or hard of hearing, call our TTY number, 1-800-325-0778).

GIUFFRE009176

CONFIDENTIAL

SSA-1826

ITEMIZED STATEMENT OF EARNINGS
* * * FOR SSN XXX-XX-[REDACTED] * * *

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FROM: SOCIAL SECURITY ADMINISTRATION
 OFFICE OF CENTRAL OPERATIONS
 6100 WABASH AVENUE
 BALTIMORE MARYLAND 21215

NUMBER HOLDER NAME: VIRGINIA GIUFFRE
 YEARS REQUESTED: 1998 THRU 2002; 2013 THRU 2015

BOIES SCHILLER AND FLEXNER
 401 E LAS OLAS BLVD STE 1200
 FORT LAUDERDALE FL 33301

EMPLOYER NUMBER: [REDACTED]
 KFC USA INC
 % PAYROLL DEPT
 5200 COMMERCE CROSSING DR
 LOUISVILLE KY 40229-2182

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					\$140.70

EMPLOYER NUMBER: [REDACTED]
 PUBlix SUPER MARKETS INC
 PO BOX 32018
 LAKELAND FL 33802-2018

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					\$216.69

EMPLOYER NUMBER: [REDACTED]
 ASCENSION CHILD CARE CENTER
 ASCENSION PEACE CHILD CARE CENTER
 2701 N STATE ROAD 7
 LAUD LAKES FL 33313-2731

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					\$216.97

SSA-1826

ITEMIZED STATEMENT OF EARNINGS

* * * FOR SSN [REDACTED] * * *

EMPLOYER NUMBER: [REDACTED]
 AVICULTURAL BREEDING & RESEARCH
 CENTER
 % ERNEST LAKS
 14201 125TH AVE N
 WEST PALM BCH FL 33418-7945

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$99.48

EMPLOYER NUMBER: [REDACTED]
 SOUTHEAST EMPLOYEE MANAGEMENT
 COMPANY
 2559 PALM DEER DR
 LOXAHATCHEE FL 33470-2563

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$3,212.44

EMPLOYER NUMBER: [REDACTED]
 MAR-A-LAGO CLUB LLC
 TRUMP DONALD J GEN PTR
 % TRUMP ORGANIZATION
 1100 S OCEAN BLVD
 PALM BEACH FL 33480-5004

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$1,866.50

EMPLOYER NUMBER: [REDACTED]
 OASIS OUTSOURCING VI INC
 2054 VISTA PKWY STE 300
 WEST PALM BCH FL 33411-6742

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$2,037.60

EMPLOYER NUMBER: [REDACTED]
 NEIMAN-MARCUS GROUP LLC
 % NEIMAN MARCUS GROUP LTD SOLE MBR
 1201 ELM ST
 DALLAS TX 75270-2102

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$1,440.79

SSA-1826

ITEMIZED STATEMENT OF EARNINGS

* * * FOR SSN [REDACTED] * * *

EMPLOYER NUMBER: [REDACTED]
 MANNINOS INC
 MANNINOS RESTAURANT
 12793 B W FOREST HILL BLVD
 WEST PALM BEACH FL 33414-4749

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2001					\$212.00

EMPLOYER NUMBER: [REDACTED]
 CCI OF ROYAL PALM INC
 % ROBERT FURR TTEE
 2255 GLADES RD STE 337-W
 BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$403.64

EMPLOYER NUMBER: [REDACTED]
 ROADHOUSE GRILL INC
 ROBERT C FURR TTEE IN BANKRUPTCY
 2255 GLADES RD STE 337W
 BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$1,247.90

EMPLOYER NUMBER: [REDACTED]
 MARC PINKWASSER DVM PA
 13860 WELLINGTON TRCE STE 31
 WELLINGTON FL 33414-8541

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$1,561.75

EMPLOYER NUMBER: [REDACTED]
 GREAT OUTDOORS PREMIER RV-GOLF
 RESORT COMMUNITY SVC ASSOC INC
 145 PLANTATION DR
 TITUSVILLE FL 32780-2528

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2014					\$171.83

EXHIBIT 47

(Filed Under Seal)

Monday, November 7, 2016
 1Quicken Data - All Accounts

Page: 1

QuickReport by Description
 8/12/69 through 1/29/03

Date	Account	Num	Payee	Memo	Category	C Ir
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		<i>split</i>	R
5/6/02	Courtyard Animal Hospital	1522	VOIDvirginia Roberts			R
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		<i>split</i>	R
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		<i>split</i>	R
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		<i>split</i>	R

Total 8/12/69 - 1/29/03

Total Inflows
 Total Outflows

Net Total

EXHIBIT 48

(Filed Under Seal)

----- Forwarded message -----

From: <ross@acuityreputation.com>
Date: 2 January 2015 at 20:29
Subject: Re: URGENT - this is the statement
To: G Max <gmax1@ellmax.com>
Cc: Philip Barden <philip.barden@devonshires.co.uk>

OK G going with this, thanks Philip.
Sent from my BlackBerry® wireless device

From: [REDACTED]
Date: Fri, 2 Jan 2015 20:14:53 +0000
To: Ross Gow<ross@acuityreputation.com>
Cc: Philip Barden<philip.barden@devonshires.co.uk>
Subject: FW: URGENT - this is the statement

Jane Doe 3 Is Virginia Roberts so not a new individual.

The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue.

The original allegations are not new and have been fully responded to and shown to be untrue

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschitz is involved in having sexual relations with her, which he denies

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.



EXHIBIT 49

(Filed Under Seal)

EXHIBIT 50

(Filed Under Seal)

EXHIBIT12

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES

/

**JANE DOE #3 AND JANE DOE #4's CORRECTED MOTION PURSUANT TO RULE 21
FOR JOINDER IN ACTION**

COME NOW Jane Doe #3 and Jane Doe #4 (also referred to as "the new victims"), by and through undersigned counsel, to file this motion pursuant to Federal Rule of Civil Procedure 21 to join this action, on the condition that they not re-litigate any issues already litigated by Jane Doe #1 and Jane Doe #2 (also referred to as "the current victims"). The new victims have suffered the same violations of their rights under the Crime Victims' Rights Act (CVRA) as the current victims. Accordingly, they desire to join in this action to vindicate their rights as well. Because the new victims will not re-litigate any issues previously litigated by the current victims (and because they are represented by the same legal counsel as the current victims), the Government will not be prejudiced if the Court grants the motion. The Court may "at any time" add new parties to the action, Fed. R. Civ. P. 21. Accordingly, the Court should grant the motion.¹

FACTUAL BACKGROUND

¹ As minor victims of sexual offenses, Jane Doe #3 and Jane Doe #4 desire to proceed by way of pseudonym for the same reasons that Jane Doe #1 and Jane Doe #2 proceeded in this fashion. Counsel for the new victims have made their true identities known to the Government.

As the Court is aware, more than six years ago, Jane Doe #1 filed the present action against the Government, alleging a violation of her rights under the CVRA, 18 U.S.C. § 3771. DE1. She alleged that Jeffrey Epstein had sexually abused her and that the United States had entered into a secret non-prosecution agreement (NPA) regarding those crimes in violation of her rights. At the first court hearing on the case, the Court allowed Jane Doe #2 to also join the action. Both Jane Doe #1 and Jane Doe #2 specifically argued that the government had failed to protect their CVRA rights (*inter alia*) to confer, to reasonable notice, and to be treated with fairness. In response, the Government argued that the CVRA rights did not apply to Jane Doe #1 and Jane Doe #2 because no federal charges had ever been filed against Jeffrey Epstein.

The Court has firmly rejected the United States' position. In a detailed ruling, the Court concluded that the CVRA extended rights to Jane Doe #1 and Jane Doe #2 even though federal charges were never filed. DE 189. The Court explained that because the NPA barred prosecution of crimes committed against them by Epstein, they had "standing" to assert violations of the CVRA rights. *Id.* The Court deferred ruling on whether the two victims would be entitled to relief, pending development of a fuller evidentiary record. *Id.*

Two other victims, who are in many respects similarly situated to the current victims, now wish to join this action. The new victims joining at this stage will not cause any delay and their joinder in this case is the most expeditious manner in which to pursue their rights. Because the background regarding their abuse is relevant to the Court's assessment of whether to allow them to join, their circumstances are recounted here briefly.

Jane Doe #3's Circumstances

As with Jane Doe #1 and Jane Doe #2, Jane Doe #3 was repeatedly sexually abused by

Epstein. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA. Moreover, even a rudimentary investigation of Jane Doe #3's relationship to Epstein would have revealed the fact that she had been trafficked throughout the United States and internationally for sexual purposes. Nonetheless, the Government secretly negotiated a non-prosecution agreement with Epstein precluding any Federal prosecution in the Southern District of Florida of Epstein and his co-conspirators. As with Jane Doe #1, and Jane Doe #2, the Government concealed the non-prosecution agreement from Jane Doe #3 – all in violation of her rights under the CVRA – to avoid Jane Doe #3 from raising powerful objections to the NPA that would have shed tremendous public light on Epstein

and other powerful individuals and that would likely have been prevented it from being concluded in the secretive manner in which it was.

Jane Doe #4's Circumstances

If permitted to join this action, Jane Doe #4 would allege, and could prove at trial, that she has CVRA claims similar to those advanced by Jane Doe #1 and Jane Doe #2, based on the following:

As with the other Jane Does, Jane Doe #4 was repeatedly sexually abused by Epstein. In or around the summer of 2002, Jane Doe #4, an economically poor and vulnerable sixteen-year-old child, was told by another one of Epstein's underage minor sex abuse victims, that she could make \$300 cash by giving an old man a massage on Palm Beach. An acquaintance of Jane Doe #4 (also a minor sexual abuse victim of Epstein) telephoned Epstein and scheduled Jane Doe #4 to go to Epstein's house to give him a massage. During that call, Epstein himself got on the phone (a means of interstate communication) with Jane Doe #4, asking her personally to come to his mansion in Palm Beach.

Jane Doe #4 then went to Epstein's mansion and was escorted upstairs to Epstein's large bathroom by one of Epstein's assistants. Shortly thereafter Jeffrey Epstein emerged and lay face down on the table and told Jane Doe #4 to start massaging him. Epstein asked Jane Doe #3 her age and she told him she had recently turned sixteen. Epstein subsequently committed illegal sexual acts against Jane Doe #4 on many occasions.

Epstein used a means of interstate communication (i.e., a cell phone) to arrange for these sexual encounters. Epstein also frequently travelled in interstate commerce (i.e., on his personal jet) for purposes of illegally sexually abusing Jane Doe #4.

The acts Epstein committed against Jane Doe #4, constituted numerous federal sex offenses, some of which do not carry a statute of limitations and thus are not time-barred. See 18 U.S.C. § 3283. And these offenses were the kinds of offenses that the Federal Bureau of Investigation (FBI) and U.S. Attorney's Office for the Southern District of Florida were pursuing in 2007. So far as Jane Doe #4 is aware, the U.S. Attorney's Office made no serious effort to locate her. Instead, after identifying approximately forty separate underage sexually abused victims, and apparently preparing a 53-page federal indictment and with full awareness of the existence of many victims like Jane Doe #4 – unidentified and not interviewed – it entered into a non-prosecution agreement barring prosecution of Epstein's federal crimes against these victims. This is contrary to the Government's normal approach in prosecuting federal sex offenses. It also violated Jane Doe #4's rights under the CVRA, including the fact that she had a "reasonable" right to confer with the U.S. Attorney's Office before they entered into an agreement with a sex offender barring prosecution of him for the crimes he committed against her. 18 U.S.C. § 3771(a)(5).

MOTION FOR JOINDER

Jane Doe #3 and Jane Doe #4 now both move to join this action filed by Jane Doe #1 and Jane Doe #2, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Rule 21 provides that "[o]n motion or on its own, the court may at any time, on just terms, add . . . a party." Rule 21 "grants the court broad discretion to permit a change in the parties at any stage of a litigation." *Ford v. Air Line Pilots Ass'n Int'l*, 268 F. Supp. 2d 271, 295 (E.D.N.Y. 2003) (internal quotation omitted). The new victims should be allowed to join the current victims in this action under Rule 21.

The new victims will establish at trial that the Government violated their CVRA rights in the same way as it violated the rights of the other victims. The new victims' participation in this case is important because it appears that the Government intends to raise a factual defense that somehow it did keep Jane Doe #1 and Jane Doe #2 properly informed of what was happening in the criminal prosecution. Of course, if four victims all testify consistently that they were not properly informed by the Government (as we believe they will), that provides a stronger case for a CVRA violation.

In addition, Jane Doe #3 and Jane Doe #4's participation is relevant to a defense the Court has allowed the Government to raise. The Court has previously ruled that the victims' request for rescission of the NPA "implicates a fact-sensitive equitable defense which must be considered in the historical factual context of the entire interface between Epstein, the relevant prosecutorial authorities and the federal offense victims – including an assessment of the allegation of a deliberate conspiracy between Epstein and federal prosecutors to keep the victims in the dark on the pendency of negotiations between Epstein and federal authorities until well after the fact and presentation of the non-prosecution agreement to them as *a fait accompli*." DE 189 at 12 n.6 (emphasis added). Jane Doe #3's and Jane Doe #4's participation in this case will help to show what the "entire interface" was between the Government and the victims and thus to respond to the Government's estoppel arguments as well as other defenses that it appears to be preparing to raise. See, e.g., DE 62 (52-page response from the Government to the victim's summary judgment motion, raising numerous factually-based and other arguments against the victim's position).

Jane Doe #3's and Jane Doe #4's participation is also directly relevant to the discovery disputes currently pending in this case. The Government has raised various relevancy objections to the documents that Jane Doe #1 and Jane Doe #2 are attempting to obtain. The current victims have responded by explaining how these documents are relevant, including explaining how these documents might bear on the way in which Epstein used his powerful political and social connections to secure a favorable plea deal, as well as provide proof of the Government's motive to deliberately fail to investigate certain aspects of the victims' claims in an effort to maintain the secrecy of the facts and resolve the case without the victims' knowledge. See, e.g., DE 266 at 6-10. Jane Doe #3 and Jane Doe #4's participation will help prove the relevancy of these requests, as well as the need for those requests.

One clear example is Request for Production No. 8, which seeks documents regarding Epstein's lobbying efforts to persuade the Government to give him a more favorable plea arrangement and/or non-prosecution agreement, including efforts on his behalf by Prince Andrew and former Harvard Law Professor Alan Dershowitz. Jane Doe #1 and Jane Doe #2 have alleged these materials are needed to prove their allegations that, after Epstein signed the non-prosecution agreement, his performance was delayed while he used his significant social and political connections to lobby the Justice Department to obtain a more favorable plea deal. See, e.g., DE 225 at 7-8 (discussing DE 48 at 16-18). Jane Doe #3 has direct personal knowledge of Epstein's connection with some of these powerful people and thus how Epstein might have used them to secure favorable treatment.

Adding two new victims to this case will not delay any of the proceedings. They will simply join in motions that the current victims were going to file in any event. For example, the

new victims will simply join in a single summary judgment motion that the current victims anticipate filing after discovery has been completed.

Nor will adding the new victims prejudice the United States. As the court is aware, this Court is still in its initial discovery stage. The Court is currently considering whether to reject the Government's assertion of privilege over documents regarding the case. See DE 265 (victims' reassertion of objections to the Government privilege claims). The new victims do not seek any additional discovery beyond that previously sought by the current victims.² Accordingly, the United States will not be prejudiced or burdened by adding them to this case.

The CVRA does not contain any statute of limitations for filing an action to enforce rights under the statute. Accordingly, were the Court to deny this motion, the result might be that the new victims would then be forced to file a separate suit raising their claims, which would then possibly proceed on a separate litigation track. Rather than require duplicative litigation, the Court should simply grant their motion to join.

Jane Doe #1 and Jane Doe #2 support the joinder motion. Counsel for the victims have discussed this motion with the Government at length in an effort to avoid any need to file a substantive pleading on the issue. Counsel for the victims asked the Government during the summer for its position on joinder. The Government, however, took the matter under advisement for months. Ultimately, after several inquiries from victims counsel, the Government indicated without explanation that it opposes this motion. Counsel for the victims has requested a meeting with the Government on this issue, which will hopefully occur in

² Jane Doe #3 and Jane Doe #4 have asked the Government to provide them with the record of their statements that they provided to the FBI. These FBI 302's should be only a few pages long.

January. In the meantime, however, counsel for the victims believe that it is no longer appropriate to delay filing this motion and accordingly file it at this time. Because the Government is apparently opposing this motion, Jane Doe #3 and Jane Doe #4 have described the circumstances surrounding their claims so that the Court has appropriate information to rule on the motion.

CONCLUSION

Jane Doe #3 and Jane Doe #4 should be allowed to join this action, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Their joinder should be conditioned on the requirement that they not re-litigate any issues previously litigated by Jane Doe #1 and Jane Doe #2. A proposed order to that effect is attached to this pleading.

DATED: January 2, 2015

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing document was served on January 2, 2015, on the following using
the Court's CM/ECF system:

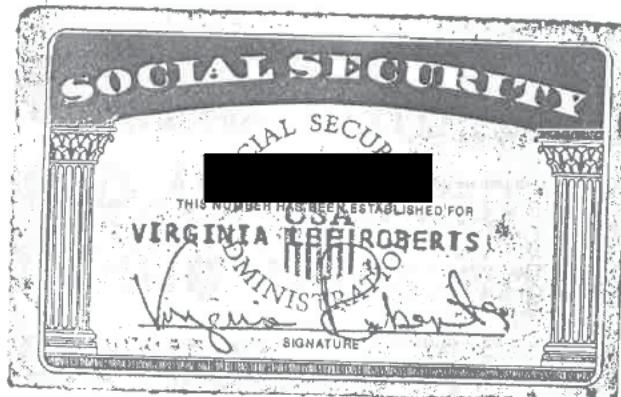
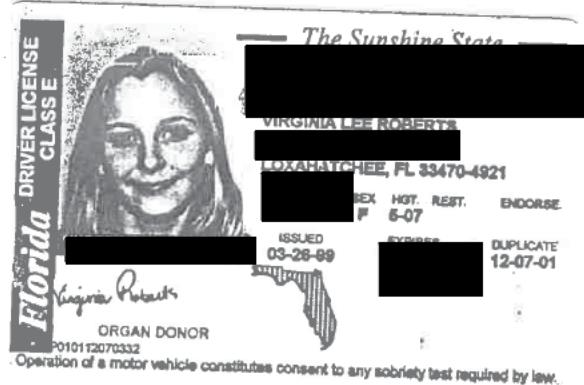
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/s/ Bradley J. Edwards

EXHIBIT 51

(Filed Under Seal)



Selected docket entries for case 18-2868

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Filed	Document Description	Page	Docket Text
08/09/2019	<u>284 UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED</u>	2	UNSEALED SUMMARY JUDGMENT RECORD, appendix 10 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628244] [18-2868]
08/09/2019	<u>285 UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED</u>	40	UNSEALED SUMMARY JUDGMENT RECORD, appendix 11 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628246] [18-2868]
08/09/2019	<u>286 UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED</u>	44	UNSEALED SUMMARY JUDGMENT RECORD, appendix 12 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628248] [18-2868]
08/09/2019	<u>287 UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED</u>	99	UNSEALED SUMMARY JUDGMENT RECORD, appendix 13 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628251] [18-2868]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

15-cv-07433-RWS

**Defendant's Reply to Plaintiff's Statement of
Contested Facts and Plaintiff's "Undisputed Facts"
Pursuant to Local Civil Rule 56.1**

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Pursuant to Rule 56.1 of the Local Civil Rules of this Court, defendant Ghislaine Maxwell submits this Reply to Plaintiff's Statement of Contested Facts and Plaintiff's Undisputed Facts ("Response"), Doc. 586-1.

INTRODUCTION

Plaintiff's Response fails under both the Federal Rules of Evidence and the Local Civil Rules of Procedure.

First, Plaintiff largely failed to provide any "citation to evidence which would be admissible" to challenge Defendant's Statement of Material Undisputed Facts and therefore Ms. Maxwell's undisputed facts should be deemed admitted.

Second, rather than set forth "additional material facts as to which it is contended that there exists *a genuine issue to be tried*" (Local Civil Rule 56.1(b)), Plaintiff instead set forth her own purportedly "undisputed facts." Because Plaintiff did not cross-move for summary judgment, her supposedly "undisputed facts" are not permitted by the Rules and should be stricken.

I. Ms. Maxwell's reply in support of statement of undisputed facts.

1. **Undisputed Fact 1:** In early 2011 plaintiff in two British tabloid interviews made numerous false and defamatory allegations against Ms. Maxwell. In the articles, plaintiff made no direct allegations that Ms. Maxwell was involved in any improper conduct with Jeffrey Epstein, who had pleaded guilty in 2007 to procuring a minor for prostitution. Nonetheless, plaintiff suggested that Ms. Maxwell worked with Epstein and may have known about the crime for which he was convicted. Exs. A and B.

a. **Reply:** Plaintiff cites no admissible evidence to contest these undisputed facts.

McCawley Ex.34 (GIUFFRE368) is an email from Sharon Churcher to Plaintiff. It is Ms. Churcher's hearsay and therefore inadmissible. In any event, it does not speak to the

contents of Plaintiff's interviews with Churcher. McCawley Decl. Ex. 31 is an FBI interview, also inadmissible hearsay, which again does not describe Plaintiff's interviews in news articles. In the absence of contrary evidence, Undisputed Fact 1 should be deemed admitted.

2. **Undisputed Fact 2:** In the articles, plaintiff alleged she had sex with Prince Andrew, "a well-known businessman," a "world-renowned scientist," a "respected liberal politician," and a "foreign head of state." Exs. A-B at 5.

a. **Reply:** Plaintiff does not contest these facts and they therefore should be deemed admitted.

3. **Undisputed Fact 3:** In response to the allegations Ms. Maxwell's British attorney, working with Mr. Gow, issued a statement on March 9, 2011, denying "the various allegations about [Ms. Maxwell] that have appeared recently in the media. These allegations are all entirely false." Ex.C.

a. **Reply:** Plaintiff "denies" that Mr. Barden "issued a statement," but offers no admissible evidence to refute this point. Further, she acknowledges that the Statement was issued "By Devonshires Solicitors," Mr. Barden's law firm.

4. **Undisputed Fact 4:** The statement read in full:

Statement on Behalf of Ghislaine Maxwell

By Devonshires Solicitors, PRNE
Wednesday, March 9, 2011

London, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her that have appeared recently in the media. *These allegations are all entirely false.*

It is unacceptable that letters sent by Ms Maxwell's legal representatives to certain newspapers pointing out the truth and asking for the allegations to be withdrawn have simply been ignored.

In the circumstances, *Ms Maxwell is now proceeding to take legal action against those newspapers.*

"I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get in the way of a good story." However, *the allegations made against me are abhorrent and entirely untrue* and I ask that they stop," said Ghislaine Maxwell.

"A number of newspapers have shown a complete lack of accuracy in their reporting of this story and a failure to carry out the most elementary investigation or any real due diligence. I am now taking action to clear my name," she said.

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Ex.C.

a. **Reply:** Plaintiff does dispute the contents of the 2011 statement and therefore it should be deemed admitted.

5. **Undisputed Fact 5:** Plaintiff's gratuitous and "lurid" accusations in an unrelated action. In 2008 two alleged victims of Epstein brought an action under the Crime Victims' Rights Act against the United States government purporting to challenge Epstein's plea agreement. They alleged the government violated their CVRA rights by entering into the agreement. Ex.D, at 2.

a. **Reply:** Plaintiff "stipulates" to the facts contained in paragraph 5 and therefore they should be deemed admitted.

6. **Undisputed Fact 6:** Seven years later, on December 30, 2014, Ms. Giuffre moved to join the CVRA action, claiming she, too, had her CVRA rights violated by the government. On January 1, 2015, Ms. Giuffre filed a "corrected" joinder motion. Ex.D at 1, 9.

a. **Reply:** Plaintiff "agreed" to this paragraph.

7. **Undisputed Fact 7:** The issue presented in her joinder motion was narrow: whether she should be permitted to join the CVRA action as a party under Federal Rule of Civil Procedure 21, specifically, whether she was a “known victim[] of Mr. Epstein and the Government owed them CVRA duties.” Yet, “the bulk of the [motion] consists of copious factual details that [plaintiff] and [her co-movant] ‘would prove . . . if allowed to join.’” Ms. Giuffre gratuitously included provocative and “lurid details” of her alleged sexual activities as an alleged victim of sexual trafficking. Ex.E, at 5.

a. **Reply:** Plaintiff does not dispute that Judge Marra made the findings detailed in Undisputed Fact 7. Further, she admits that the Government refused to stipulate that she “had been sexually abused by Jeffrey Epstein and his co-conspirators (including co-conspirator Alan Dershowitz), which would make her a ‘victim’ of a broad sex trafficking conspiracy.” Although she now submits there were other reasons for inclusion of such lurid details, those reasons were rejected by Judge Marra. As she does not offer any admissible evidence to contradict the findings made by Judge Marra, this “fact,” specifically Judge Marra’s findings, should be deemed admitted. In any event, we request under Fed. R. Evid. 201(c)(2) that the Court take judicial notice of the contents of Judge Marra’s ruling and order.

8. **Undisputed Fact 8:** At the time they filed the motion, Ms. Giuffre and her lawyers knew that the media had been following the Epstein criminal case and the CVRA action. While they deliberately filed the motion without disclosing Ms. Giuffre’s name, claiming the need for privacy and secrecy, they made no attempt to file the motion under seal. Quite the contrary, they filed the motion publicly. Ex.D, at 1 & n.1.

a. **Reply:** Plaintiff offers no admissible evidence to refute these facts and they therefore should be deemed admitted. Specifically, she does not offer any evidence to dispute that she knew the media had been following Epstein and the CVRA action, nor does she dispute that her attorneys made no attempt to file the motion under seal, rather filing it publicly. The facts are thus admitted.

9. Undisputed Fact 9: As the district court noted in ruling on the joinder motion, Ms. Giuffre “name[d] several individuals, and she offers details about the type of sex acts performed and where they took place.” The court ruled that “these lurid details are unnecessary”: “The factual details regarding whom and where the Jane Does engaged in sexual activities are immaterial and impertinent . . . , especially considering that these details involve *non-parties* who are not related to the respondent Government.” Accordingly, “[t]hese unnecessary details shall be stricken.” *Id.* The court then struck all Ms. Giuffre’s factual allegations relating to her alleged sexual activities and her allegations of misconduct by non-parties. The court said the striking of the “lurid details” was a sanction for Ms. Giuffre’s improper inclusion of them in the motion. Ex.E at 5-7.

a. **Reply:** Plaintiff offers no admissible evidence to refute these facts and they therefore should be deemed admitted. See Reply to Undisputed Fact 7, *supra*. In any event, we request under Fed. R. Evid. 201(c)(2) that the Court take judicial notice of the contents of Judge Marra’s ruling and order.

10. Undisputed Fact 10: The district court found not only that the “lurid details” were unnecessary but also that the entire joinder motion was “entirely unnecessary.” Ms. Giuffre and her lawyers knew the motion with all its “lurid details” was unnecessary because the motion

itself recognized that she would be able to participate as a fact witness to achieve the same result she sought as a party. The court denied plaintiff's joinder motion. *Id.* at 7-10.

a. **Reply:** Plaintiff offers no admissible evidence to refute these facts and they therefore should be deemed admitted. *See Reply to Undisputed Fact 7, supra.*

11. Undisputed Fact 11: One of the non-parties Ms. Giuffre "named" repeatedly in the joinder motion was Ms. Maxwell. According to the "lurid details" of Ms. Giuffre included in the motion, Ms. Maxwell personally was involved in a "sexual abuse and sex trafficking scheme" created by Epstein:

- Ms. Maxwell "approached" plaintiff in 1999 when plaintiff was "fifteen years old" to recruit her into the scheme.
- Ms. Maxwell was "one of the main women" Epstein used to "procure under-aged girls for sexual activities."
- Ms. Maxwell was a "primary co-conspirator" with Epstein in his scheme.
- She "persuaded" plaintiff to go to Epstein's mansion "in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children."
- At the mansion, when plaintiff began giving Epstein a massage, he and Ms. Maxwell "turned it into a sexual encounter."
- Epstein "with the assistance of" Ms. Maxwell "converted [plaintiff] into . . . a 'sex slave.'" *Id.* Plaintiff was a "sex slave" from "about 1999 through 2002."
- Ms. Maxwell also was a "co-conspirator in Epstein's sexual abuse."
- Ms. Maxwell "appreciated the immunity" she acquired under Epstein's plea agreement, because the immunity protected her from prosecution "for the crimes she committed in Florida."
- Ms. Maxwell "participat[ed] in the sexual abuse of [plaintiff] and others."
- Ms. Maxwell "took numerous sexually explicit pictures of underage girls involved in sexual activities, including [plaintiff]." *Id.* She shared the photos with Epstein.

- As part of her “role in Epstein’s sexual abuse ring,” Ms. Maxwell “connect[ed]” Epstein with “powerful individuals” so that Epstein could traffick plaintiff to these persons.
- Plaintiff was “forced to have sexual relations” with Prince Andrew in “[Ms. Maxwell’s] apartment” in London. Ms. Maxwell “facilitated” plaintiff’s sex with Prince Andrew “by acting as a ‘madame’ for Epstein.”
- Ms. Maxwell “assist[ed] in internationally trafficking” plaintiff and “numerous other young girls for sexual purposes.”
- Plaintiff was “forced” to watch Epstein, Ms. Maxwell and others “engage in illegal sexual acts with dozens of underage girls.”

Id. at 3-6.

a. **Reply:** Plaintiff offers no admissible evidence to refute the facts actually stated in the paragraph, i.e., that the “lurid” details (as coined by Judge Marra) were included in her CVRA Joinder Motion. Plaintiff claims to offer “admissible evidence” to “corroborate the statements [she] made in the joinder motion.” Setting aside for the moment that most of the cited documents are inadmissible hearsay, as addressed later, such evidence should be disregarded because none of the offered documents speak to fact that these “lurid” details were actually included in the joinder motion, as a simple reading of Ex.D reveals. Because Plaintiff does not refute that point, the fact that the details were in the Joinder Motion should be deemed admitted. In any event, we request under Fed. R. Evid. 201(c)(2) that the Court take judicial notice of the contents of plaintiff’s CVRA joinder motion.

12. **Undisputed Fact 12:** In the joinder motion, plaintiff also alleged she was “forced” to have sex with Harvard law professor Alan Dershowitz, “model scout” Jean Luc Brunel, and “many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders.”

Id. at 4-6.

a. **Reply:** Again, Plaintiff offers no evidence that these “lurid details” were included in the Joinder Motion, as indeed they were, and thus the fact that they were should be deemed admitted.

13. **Undisputed Fact 13:** Plaintiff said after serving for four years as a “sex slave,” she “managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years.” *Id.* at 3

a. **Reply:** Plaintiff does not dispute that she made this statement in her joinder motion and it is admitted.

14. **Undisputed Fact 14:** Plaintiff suggested the government was part of Epstein’s “conspiracy” when it “secretly” negotiated a non-prosecution agreement with Epstein precluding federal prosecution of Epstein and his “co-conspirators.” The government’s secrecy, plaintiff alleged, was motivated by its fear that plaintiff would raise “powerful objections” to the agreement that would have “shed tremendous public light on Epstein and other powerful individuals. *Id.* at 6-7.

a. **Reply:** Plaintiff does not contest the quoted contents of the joinder motion, but rather offers argument regarding Plaintiff’s purported “belief.” Plaintiff did not submit an affidavit attesting to such “belief” and therefore no admissible evidence was cited or offered. The facts should therefore be deemed admitted.

15. **Undisputed Fact 15:** Notably, the other “Jane Doe” who joined plaintiff’s motion who alleged she was sexually abused “many occasions” by Epstein was unable to corroborate any of plaintiff’s allegations. *Id.* at 7-8.

a. **Reply:** Plaintiff states the facts are “untrue” but offers no admissible evidence to support that statement. She has no affidavit or other statement from “the other ‘Jane