

**Affidavit of Alan Dershowitz Regarding Potential Extortion Conspiracy
Involving [REDACTED], and Various Members of Her Legal Team**

From the day I was falsely accused of having sexual contact with Ms. [REDACTED] (otherwise known as [REDACTED]), I believed that these allegations were leveled for improper financial reasons. Over the course of the past year, I have been made aware of facts that substantiate my belief that several of Ms. [REDACTED] lawyers, including Mr. [REDACTED] and Ms. [REDACTED] engaged in a conspiracy to extort money from wealthy individuals. One of these individuals is Mr. Lesley Wexner who runs Limited Too and Victoria's Secret.

Indeed, it is my belief that Ms. [REDACTED] lawyers worked together: A. to threaten Mr. Wexner with salacious information B. to offer him an opportunity to keep his name out of the media C. to obtain publicity for Ms. [REDACTED] allegations D. to share in the proceeds of the extortion.

I first learned that Mr. Wexner was the primary target of this conspiracy from a woman named [REDACTED] [REDACTED], who is a [REDACTED] of [REDACTED]. [REDACTED] reached out to me in early April 2015, and over the course of about ten conversations during the next several months, she told me that Ms. [REDACTED] never intended to mention me in any public filing but she felt pressured to do so by her lawyers. She also told me facts that showed that the reason my name was mentioned was to extort a large financial settlement from Mr. Wexner. Although she did not use the word extortion, the substance of her conversation led inescapably to the conclusion that naming me publicly, while not naming Mr. Wexner publicly, was an essential element of the extortion plot.

With her permission, I recorded some of the crucial elements of our conversations, and later had them transcribed. As the transcripts make clear, throughout this period [REDACTED] was in contact with Ms. [REDACTED], and spent time with her on several occasions. Indeed, the information she relayed to me was based in part on contemporaneous conversations she had with Ms. [REDACTED]. Here are the relevant excerpts:

Tape A

Alan M. Dershowitz: Now turning on a tape recorder and I'm recording with uh your permission. So please repeat what you told me previously.

[REDACTED]: Okay, um that [REDACTED] never wanted to go after you um but she felt pressure um by her lawyers and that she had never... I've never heard her mention you as when we were kids or you know until very recently after everything has happened in the media but I've never heard her mention you before.

Alan M. Dershowitz: Okay thank you and I'm turning off the tape recorder. Thank you so much.

Tape B

Alan M. Dershowitz: [inaudible] record and where you repeat what you basically said to me before about the uh man in Columbus and um what he um and how they intended to get the amount of money they intended to get from them. That's crucial. So can you give me that for just like 30 seconds?

[REDACTED] Okay, I mean she never told me his name. I know it from you saying it.

Alan M. Dershowitz: We know his name of course.

[REDACTED] Okay...

Alan M. Dershowitz: Tell me how she described him to you.

[REDACTED] She just said that he owned Victoria Secret and Limited Too, and that he had lots and lots of money. You know, was a billionaire.

Alan M. Dershowitz: Great. And what did they want to do?

[REDACTED] They wanted to sue him for at least half his money and use it for the charities that they're trying to start.

Alan M. Dershowitz: And what would the lawsuit be based on?

[REDACTED] Oh I guess the... she didn't say exactly, just being affiliated with Epstein the alleged you know and partaking you know in the girls that he would provide them or provide him.

Alan M. Dershowitz: Yeah. And did they think they would have to bring the lawsuit or would they just be able to threaten the lawsuit and he would pay the money?

[REDACTED] She made it sound like to me that they were already talking to him and they were, they had already you know in the process of suing him.

Alan M. Dershowitz: Aha. And was he going to then you think settle it or was he actually going to litigate it... what did it sound like?

[REDACTED] She didn't really say but she made it sound like she as pretty positive about it and then I didn't hear about it for like months and then you know the last time she talked about the charity, it wasn't about him anymore, it was about just you know raising money going to like you know celebrity charity events to get money or I remember her you know showing she was going to do a bunch of television

interview um to raise the... and use that money that they were paying her for the interviews to help get it started.

Alan M. Dershowitz: Right but that would be...

[REDACTED] And the lawyers contributed their own money into it probably like, I don't know, like \$80,000 or something like that.

Alan M. Dershowitz: They contributed \$80,000 to what, to the fund?

[REDACTED] The charity yeah, to get it started for her.

Alan M. Dershowitz: And were the lawyers charging her or how did that work... do you know?

[REDACTED] Nope, I mean, uh, she, to her, I think the result of her, or what do you call it, pro bono, they weren't charging anything for their, ya know.

Alan M. Dershowitz: But did they expect to get something out of it if they sued this rich guy in Columbus from Victoria Secret.

[REDACTED] Really, it's, she didn't say it exactly but that's just kind of like, you know, looking at it in retrospect, that's how it seemed, you know, it just seemed like it was, they saw an opportunity to make a lot of money.

Alan M. Dershowitz: And did she mention, she didn't mention who the lawyers are or where they were from did she?

[REDACTED] No. I just have that paperwork that was sent to me by... from them.

Alan M. Dershowitz: right. Sure. But do you know who sent it to you?

[REDACTED] Um, she sent, I mean, no, I don't know exactly, she sent it to me... it was forwarded from her email to my email.

Alan M. Dershowitz: Right. And my understanding is that she was going to try to get the uh ABC to uh give her some credibility so that that would increase the leverage on being able to get a settlement or a lawsuit?

[REDACTED] Yeah, I mean...

Alan M. Dershowitz: Yeah, alright, well I appreciate that and again just repeat you gave me permission to record this and um would you just say yes so?

[REDACTED] Okay, yes.

Alan M. Dershowitz: I appreciate that. Thank you. If you can think of anything else, just please, please let me know because um this is very, very important.

Tape C

Alan M. Dershowitz: I'm recording now with your permission so just tell me the story as as simply as you can.

[REDACTED] Okay about the interaction that I had with her where she told me about what was going to happen when it came to starting this charity?

Alan M. Dershowitz: Right.

[REDACTED] ... is what you're asking?

Alan M. Dershowitz: Yeah, yeah.

[REDACTED] Okay. Um you want me to talk now.

Alan M. Dershowitz: Yeah, sure.

[REDACTED] Ok alright, earlier we were together on Clemantis we had dinner at Dempsey's and she just kind of told me about how she was going to sue the man who owned Limited Too and Victoria Secret for lots of money and that they were going to be able to take that money and start this charity to help you know women that had been trafficked and that you know there were other big names that she was going to be able to um also um refer to what happened or what she said had happened when she was younger. Uh I don't know exactly what else. She didn't really mention names just one, just the one that I don't remember his, the guy who owns, you know, Victoria Secret and all that and uh she also said to me that when it came to Alan Dershowitz that she did feel pressure to go after you, after him... um her, you know to, she felt pressure to do it, she didn't want to go after you specifically, that she felt pressured by her lawyers to do that.

Alan M. Dershowitz: Alright, well thank you very much I really appreciate it. You know, we were recording this with your permission. I'm going to turn off the recording now.

Upon learning of the extortion plot from [REDACTED] I immediately called Lesley Wexner and spoke to his wife, Abigail. I told her that I believed Mr. Wexner was being extorted, and she confirmed the fact that [REDACTED] lawyers had reached out to Mr. Wexner's lawyers. She said she would have Mr. Wexner's lawyers call me, which they then did.

John Zieger, Mr. Wexner's lawyer, confirmed that [REDACTED] and his partner [REDACTED] had sought a meeting to resolve a situation involving Mr. Wexner and their client, Ms. [REDACTED].

In subsequent phone conversations, Mr. Zieger confirmed that Mr. [REDACTED] and Ms. [REDACTED] stated that [REDACTED] had a claim against Mr. Wexner. This claim included allegations that Mr. Wexner had engaged in sexual contact with her when she was a minor on numerous occasions, including on Epstein's island, his ranch in New Mexico, his house in Palm Beach, and his home in New York. Ms. McCawley also specifically alleged that Mr. Wexner had made [REDACTED] dress up in baby doll lingerie of the type made by Victoria's Secret.

Mr. Zieger informed me that the allegations in Mr. Wexner's regard were completely fabricated, and that Mr. Wexner would not pay Ms. [REDACTED] or her representatives any amount whatsoever.

Providing this information was clearly intended to induce Mr. Wexner to pay for Ms. [REDACTED]'s silence, since an accusation that the head of Victoria's Secret had sex with an underage female, who he had dressed up in Victoria's Secret lingerie would be extremely destructive to the company and to Wexner's stewardship of the company.

It is also clear that the statute of limitations for any lawsuit against Wexner has long expired. The best proof that M [REDACTED] and Ms. [REDACTED] are aware of this is that when [REDACTED] decided to sue Ghislaine Maxwell on behalf of Ms. [REDACTED] they did not sue for the actual events that took place years earlier but for an alleged defamation that occurred during 2015.

The only realistic threat that the lawyers have over Wexner is public exposure, rather than a credible lawsuit. Therefore, the only possible purpose of Ms. [REDACTED] providing this information to Mr. Wexner would be to induce Mr. Wexner to pay Ms. [REDACTED] for her silence. Indeed, on information and belief, Mr. [REDACTED] and Ms. [REDACTED] were planning to threaten and or bring a lawsuit against Mr. Wexner if he failed to resolve the matter to their satisfaction.

This extortion scheme is substantiated by the fact that when representatives of Ms. [REDACTED] made contact with ABC in January 2015, they studiously avoided any mention of Mr. Wexner. Again, the only possible purpose for these lawyers not to name Mr. Wexner would be so that they could hold allegations over his head as a threat. Similarly, Mr. Wexner's was described as a potential witness to Mr. Epstein's alleged abuses on several occasions both Ms. [REDACTED]'s lawyers, and by Ms. [REDACTED] herself, most notably in a teleconference call from 2011. However, following the meetings between Mr. Wexner's lawyers [REDACTED] Mr. Wexner's name was excluded from the witness list in the lawsuit against Ms. Ghislaine Maxwell in New York.

On information and belief, [REDACTED] has also accused other prominent businessmen and political leaders. We are aware of their names but this information has been sealed. It is necessary to investigate whether meetings similar to those with Mr. Wexner's lawyers were held with other wealthy or prominent individuals, or their representatives.

******* The Following Paragraphs are Sealed *******

I have also learned that there are sealed documents produced during discovery in [redacted] that will confirm the fact that [redacted] never made any allegations against me until after she met with her lawyers, from whom she felt pressure to name me as one of her abusers. This further corroborates the role of Ms. [redacted] lawyers in the extortion plot described above.

Among these documents are various e-mails between Ms. [redacted] and Ms. [redacted] the reporter for [redacted] who originally reported Ms. [redacted] allegations regarding Prince Andrew of England in 2011. Ms. [redacted] also wrote several stories concerning Ms. [redacted] allegations in my regard, and apparently is a close friend of Ms. [redacted]

My name appears on two separate occasions in the correspondence between Ms. [redacted] and Ms. [redacted] a particular, on 11 May 2011 Ms. [redacted] wrote to Ms. [redacted]:

"Don't forget Alan Dershowitz... JE's buddy and lawyer -good name for your pitch as he repped Claus von Bulow and a movie was made about that case ... title was Reversal of Fortune. We all suspect Alan is a pedo and tho no proof of that, you probably met him when he was hanging put w JE"

Attached to another email is an early draft of the book Ms. [redacted] was writing regarding her experiences with Mr. Epstein. My name appears there as well:

"Jeffrey's business was running well from the looks of his attentiveness the office he owned in the Upper East Side of Manhattan. Alan Dershowitz, his colleague in finances and personal solicitor, a bird of the same feather, I had seen hanging around the island and Jeffrey's Manhattan mansion, more and more these days. Alan's taste for the young and beautiful was a bias for a blooming business relationship between him and Jeffrey. After an explicit session of Jeffrey's vulgar pilgrimage into my body, we were interrupted by a knock at the door by Jeffrey's good friend, Alan. I wrapped myself up in Jeffrey's pink bed sheets, which is the color preference he chose to sleep in because it reminded him of the same color of his own words "Pussy", and covered my face from the unexpected intrusion. Jeffrey got up and wrapped a towel around his loins and answered the door completely calm. Opening the bedroom door and letting Alan inside they began to converse about business immediately, right in front of me. Jeffrey started to tell Alan what needed to be done while he jostled some notes down quickly. I peeked my head from underneath the covers thinking they were too wrapped up in their work to notice me get up and dressed, and Jeffrey turned back to me and told me to just stay there this would only take a second. Going back to Alan he turned his focus back into work and hustled out a few more orders before letting Alan out of the door and returning his attention to me."

Beyond the fact that Ms. [redacted] story described above is wholly fabricated, more importantly, this is the only instance in which I feature in her account of her experiences with Mr. Epstein. In short, even after Ms. [redacted] urged Ms. [redacted] to include me in her memoir, Ms. [redacted] did not name me as someone with whom she

had sex. In fact, according to Ms. [REDACTED] attorneys, she had no reason to suspect me:

[REDACTED] makes no suggestion that [Ms. [REDACTED]] had sexual contact with Dershowitz. To the contrary, she states that there was 'no proof' that he was a 'pedo'—which directly contradicts such a suggestion in itself—but only that [REDACTED] probably met him when he was hanging out with [Jeffrey Epstein]."

This corroborates the accounts of [REDACTED] Ms. [REDACTED] [REDACTED] who stated that she did not name me as one of the individuals to whom she was allegedly pimped out by Mr. Epstein. It was not until after she had met with her lawyers that she suddenly "remembered" her alleged sexual relations with me—relations that in fact never occurred.