

Dear [REDACTED]

You have asked me to provide documents supporting my presentation to the U.S. attorney's office. They are attached, but let me give you a brief road map that you can send on.

The basic facts cannot and will not be disputed:

- 1) [REDACTED] lawyers chose to publicly accuse me of heinous crimes, though they could easily have sealed the documents or redacted my name. [REDACTED]
- 2) [REDACTED]
- 3) At about the same time as I was being publicly accused, and those accusations were being widely publicized in the media, [REDACTED] and his partner [REDACTED] secretly reached out to Leslie Wexner and told him that [REDACTED] was accusing him of having sex with her on multiple occasions in the same places as she claimed she had sex with me [REDACTED] and [REDACTED] met with Wexner's lawyers, John Zieger and his son at [REDACTED] New York office and spoke by phone on numerous occasions. I corroborated this information with John Zieger, and [REDACTED] himself acknowledged it to me on several occasions as well. I don't think this will be denied.
- 4) Zieger told me that [REDACTED] and [REDACTED] also told Zieger that Wexner had asked [REDACTED] to wear lingerie of the type sold by Victoria's Secret, a company that Wexner owns. The evidence of a lingerie request can be found in [REDACTED] deposition of [REDACTED] in [REDACTED] case no. [REDACTED] which is currently under seal, as well as in her deposition in [REDACTED] Zieger also relayed this information to me when we spoke by phone and I doubt he will deny it.
- 5) Zieger told me that he had told [REDACTED] that the accusation was not true and that in any event, any possible suit would be barred by the statute of limitations. Zieger asked me if I knew of any way around the statute of limitations, and I said no, because [REDACTED] was at least [REDACTED] years old, and the alleged events had taken place fifteen years earlier. Zieger will not deny this.
- 6) [REDACTED] and [REDACTED] fully realize that the statute of limitations bars any lawsuit for these alleged torts; that is why they didn't sue Ghislaine Maxwell for the underlying torts, [REDACTED]
- 7) [REDACTED] later told me that they had decided not to sue Wexner because he was "charitable." What we don't know is whether [REDACTED] "resolved" his case against Wexner and whether he now believes [REDACTED] or Wexner.

- 8) Corroboration for this entire scenario comes from ██████ "██████ ██████ ██████", who called me out of the blue and told me that ██████ had never previously mentioned me as someone who had sexually abused her, that she didn't want to name me, but that she "felt pressured" to do so by her lawyers. ██████ also told ██████ that her lawyers were seeking a billion dollars—or half of Wexner's net worth. I have included the transcript of my conversation with ██████ as an attachment (see "Transcript of Telephone Conversations Between Alan M. Dershowitz and ██████"). I also answered numerous questions regarding my communications with ██████ in my depositions in ██████. Although ██████ lawyers claimed to be representing her "pro-bono," ██████ sealed deposition in ██████ v. ██████ contradicts that. I am certain that there are written contingency fee agreements that could be subpoenaed.
- 9) After reviewing my telephone, credit card, and other documentary records—which accounted for my location on every single day during the two years that ██████ was associated with Jeffrey Epstein—██████ repeatedly stated in front of numerous witnesses that it was impossible for me to have been at several of the locations in which ██████ claimed to have had sex with me, and that she was "simply wrong" in having accused me. I attach my contemporaneous notes and those of my research assistant, which corroborate ██████ statements—statements he now falsely denies having made (see "Alan Dershowitz Memos re. Meetings/ Phone Conversations with ██████").

#### Questions

- 1) Did ██████ approach any of the other accused prominent, but far less wealthy, individuals than Wexner? If not, why not?
- 2) Did ██████ conclude, after speaking to Wexner's lawyers, that Wexner was guilty? If so, why did he not follow through with his implicit threat to sue? If ██████ concluded that Wexner was not guilty, that would mean that he also concluded that his client had made up the entire detailed account of her alleged encounters with Wexner. If so, how could he continue to represent her and rely on her credibility in bringing the suit against Maxwell?
- 3) Did Wexner offer to give anything of value in exchange for ██████ not pursuing the matter any further?
- 4) Zieger told me that he was considering bringing the matter to the U.S. Attorney's office in Columbus, Ohio. Did he ever do so? If not, why not? Zieger will probably not be affirmatively cooperative, because his client wants to keep the entire matter secret, but I do not believe he will lie or refuse to answer questions about non-privileged matters. His son was a witness to all of our conversations. He always made it a point to get his son on the call before he spoke to me (all of our conversations were by phone).







































































**TRANSCRIPT OF TELEPHONE CONVERSATIONS  
BETWEEN ALAN M. DERSHOWITZ AND [REDACTED]**

**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 to 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 now turning off the tape recorder. Thank you so much.

**TAPE B**

**ALAN M. DERSHOWITZ:** [inaudible] record and where you repeat what you basically have said to me before about the uh man in Columbus and um and 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 just 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 and 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?

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██████████: 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?

██████████: She didn't really say but she made it sound like she was 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 interviews 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 . . .

██████████: And then 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 lawyers contributed \$80,000 to what, to the fund?

██████████: 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?

██████████: 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.

██████████: 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?

██████████: 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?

██████████: 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?

██████████: 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?

██████████: 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.

██████████: 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.

██████████: ... is that what you're asking?

**ALAN M. DERSHOWITZ:** Yeah, yeah.

██████████: Okay. Um you want me to talk now?

**ALAN M. DERSHOWITZ:** Yeah, sure.

██████████: Ok alright, earlier we were together on Clematis 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 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 she 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.

**Alan Dershowitz Memos re. Meetings/ Phone Conversations with [REDACTED]**

**May 19: Memo Dictated to Maura Kelly/ Sarah Neely**

Memorandum of meeting with [REDACTED] Stone at 8:45 to 9:40AM at Sherry Netherland Hotel on May 19, 2015

Less than 5 minutes ago I completed nearly an hour long meeting with the above and I am recording my contemporary recollection of what was said. [REDACTED] told me that he was very much upset at the fact that my name was included in the federal pleading. He said it was wrong and a self-inflicted wound by [REDACTED] and her lawyers to name names, including mine. He said that had he been asked in advance he would have strongly opposed the inclusion of names. He said he was now convinced that [REDACTED] was mistaken in naming me as someone with whom she had sex. He said that it was his obligation to try to persuade her to acknowledge that I could not have been among the people with whom she had sex. He said that if he failed to persuade her of that, he would leave her representation to Edwards and Scarolo and no longer represent her.

He said that although he is always reluctant to drop a client, especially in a pro bono case, he would feel comfortable doing that in this case because she is adequately represented by her two other lawyers. He told me that he would have never taken this case if he knew that she would name me and that he regrets having taken the case. He said that it would be a win-win both for me, for [REDACTED] and for "truth and justice" were she to now acknowledge that she made a mistake in including me. He said he is convinced that I did not and could not have had sex with her.

He also told me that [REDACTED] told him she had sex with another prominent individual who he did not name. He said he had spoken to the individual and was now convinced that he too did not have sex with her. He thinks that as a young impressionable girl, she was totally confused about who it was she was having sex with. He persuaded her not to publicly identify this man, and so far she has accepted his advice. He said he wished he had had the opportunity to talk to me as well in advance of my being named and that he is confident that he could have persuaded her not to name me.

He proposed the following way of going forward. He would like me to bring my timeline evidence to him, [REDACTED] and to [REDACTED] in an effort to persuade [REDACTED] that I could not have been at the places where she claims to have had sex with me. He hopes that when she sees my evidence she will acknowledge that she made a mistake. He said it won't be easy for her to do that, but that it would be the best thing for her and her case to acknowledge her mistake. Again he repeated that if she refuses to do that, he could not ethically continue to represent her and would leave the matter to the other two lawyers. I gave him my schedule of available dates over the next month.

He agreed to try to put off the hearing that is scheduled for this Friday in Broward County court and to try to arrange a meeting with him, [REDACTED] and [REDACTED] sometime between May 29 and June 2.

The meeting was entirely amicable and I came away convinced that [REDACTED] firmly believed that I have been falsely accused and wanted to make it right by getting me out of the case and by having her withdraw her false accusation. I said that if he did so, I would be happy to apologize to the lawyers for my statements, delivered in anger, after I learned about the false accusation. I have completed dictating this memo at 9:51AM and it based on my contemporaneous best recollection of what transpired at the meeting.

### **June 1: Memo Dictated to Maura Kelly**

Meeting with [REDACTED] on June 1 between 10 am and 1 pm.

I have just left a meeting with [REDACTED] which ended with a private conversation in which he said "the lawyers who put your name in the federal pleading, not only did a stupid think that hurt their clients, they also did the wrong thing. They never should have accused you of so heinous a crime without checking and double checking, the way I did with the person I called."

At the meeting itself, [REDACTED] Nicholas Meisel and another woman from the [REDACTED] firm were present. [REDACTED] said his goal was to persuade [REDACTED] that she was mistaken in identifying me as a person with whom she had sex. He said he thinks that she actually believes that, but she is mistaken. I challenged his view that she actually believes she had sex with me, pointing to the fact that she has also said that she had dinner with Bill Clinton and Al Gore and his wife on the island. [REDACTED] responded by saying "I have never challenged [REDACTED] with regard to her statements about Al and Tipper Gore and I am not vouching for her general credibility, but I think she has come to believe the story about you.

[REDACTED] reviewed our documents, focussing on several months during two years. He asked Nick numerous questions and requested that he be shown the original records, especially cell phone records. He said that the records were very persuasive, very complete and very compelling. I told him that we could provide even more documentation, and that what he had seen was merely a work in progress. He said that the more complete the records the better he would be able to persuade [REDACTED] and her other lawyers that it was impossible that I could be the person with whom she had six sexual encounters on the island, New Mexico, the airplane and Epstein's home in Palm Beach and New York. He seemed particularly shocked when I told him that [REDACTED] had sworn that she gave Epstein oral sex while I stood next to him talking to him. He asked [REDACTED] to show him the affidavit in which she made that claim and he seemed to be shocked by it.

[REDACTED] said that the best course of conduct would be to put off all legal proceedings until after the summer so as to give us time to come to a global resolution, and also to give me time to supplement the current records with additional data. I agreed to that proposal and

he said that he would talk to Brad Edwards in an effort to get him to agree as well to put everything off to give us time to resolve this.

The meeting was entirely amicable.

**July 6: Short Quote from [REDACTED], as per notes of conversation via Skype**

Statement by [REDACTED] to Alan Dershowitz

“The next step would be for me and [REDACTED] to meet with [REDACTED] and tell her the following: ‘We know you believe that you had relations with Professor Dershowitz. However we have now reviewed the documentary evidence and we are convinced that your belief is wrong and we would like to explore with you how you could have come to that false conclusion. You could have, at your age and under the circumstances, misidentified somebody or perhaps had somebody intentionally misidentify him for you. One thing is clear—your conclusion is simply wrong.’”

**September 1: Memo to Legal Team**

Edwards told him: [REDACTED] passed two lie detector tests before they filed their papers She had sex with Ehud Barak on airplane She had sex with professor Marvin Minsky and with leslie Wexner They have seen my calendars and believe there are holes during which she could have had sex with me. They believe her. [REDACTED] believes her [REDACTED] called gore and Clinton about whether they were on the island and neither wanted to get involved. They served Epstein for a depo on my case They have me on video stating contradictory things so if she's a liar so am I. They will not settle because they're convinced she's telling the truth and they will win. I'm just repeating what Epstein told me. I don't k now how much is true but it sounds plausible. Please let me have your reactions

**September 3: Memo to Legal Team**

I had an hour long meeting with [REDACTED] this morning. He confirmed to me that [REDACTED] had taken and passed a lie detector test about me and another about Wexner. He thinks she is mistaken about me, although he also thinks that she believes it. He thinks, though he is not sure, that Edwards may be interested in a global resolution involving payment by Epstein. I don't think that we should count on that. He is still trying to convince her to say that she may have been mistaken about me, but he is not sure he will be able to. He desperately wants to avoid her being deposed and thinks that once she is deposed and locked in the matter, will be more difficult to resolve. He suggested that my lawyers work out a date with [REDACTED] for her deposition. He suggested that the date be shortly after my scheduled deposition and he suggested that we then jointly move to delay all of the depositions while negotiations continue. The good news is that he will not object to her deposition and is prepared to have it scheduled. I think that we should do that immediately so please call [REDACTED] and try to schedule her deposition as soon as

possible after mine. It would be great if she could be deposited in Dade or Palm Beach country rather than Broward, but I think that will be difficult to achieve. Please try to call [REDACTED] immediately. After the holiday next week we should schedule a conference call of the entire legal team to decide how to move forward in light of these developments. Thank you all have a good holiday, cordially, Alan

### **September 26: Memo to Legal Team**

[REDACTED] acknowledged to me [REDACTED] [REDACTED] compromised her ability to narrow the scope of her depo in my my case. [REDACTED] [REDACTED] she has waived any privacy rights. That waiver should apply to our case as well. You should feel free to tell [REDACTED] that [REDACTED] conceded to me that we should now have the right to examine her broadly.

### **Nicholas Maisel Memos re. Meetings with [REDACTED]**

#### **June 1**

On Monday June 1<sup>st</sup>, I attended a meeting at the offices of [REDACTED] in New York with Messrs. Alan Dershowitz, [REDACTED] Stone and Ms. [REDACTED]. Mr. [REDACTED] mentioned that he had been in contact with Mr. Stanley Pottinger, who was representing an unnamed individual, whom Ms. [REDACTED] had accused of having had sex with her. Mr. [REDACTED] said that after speaking to this individual, he became convinced that Ms. [REDACTED]'s accusations in this instance were unfounded, and decided not to pursue any further action.

#### **July 6**

Memo regarding meetings with [REDACTED]

On 6 July 2015, I met with [REDACTED] and [REDACTED] in Mr. [REDACTED]'s office at BSF in New York. Alan called in via skype. The stated purpose of the meeting was to provide [REDACTED] with enough information that he might convince his client, [REDACTED], that she could not possibly have had sex with Alan as described in her statements in the CVRA case. At the previous meeting, Mr. [REDACTED] described himself as convinced that Alan could not possibly have had sex with her, but stated that the more information we could provide him, the easier it would be for him to convince [REDACTED] that she was mistaken.

I walked Mr. [REDACTED] through the summary documents I had prepared describing Alan's location for the years 1999, 2000, 2001, and 2002. He repeatedly asked to see the phone records, credit card transactions, and other evidence that I had used, especially for the year 2000. Thereafter, he seemed generally convinced as to the accuracy of the summary

documents, and relied on them to note down Alan's location for the remaining three years. He stated that 1999 probably wasn't relevant anyway.

Alan and he spoke at length throughout the meeting. The tone and substance was very similar to the previous meeting, which Alan attended in person. Ms. [REDACTED] and Mr. [REDACTED] said virtually nothing. At the conclusion of the meeting in the late afternoon, [REDACTED] asked me to send him a memo regarding Alan's trips to South Florida during the relevant time period. With Alan's permission, and with the caveat that he not share the content of the memo, I agreed to do so by the end of the week.

**July 9: Letter to [REDACTED]**

Dear Mr. [REDACTED],

As discussed in our meeting of Monday July 6<sup>th</sup>, please find attached a memo outlining Mr. Dershowitz's trips to Florida between August 1999 and September 2002. The exhibits located at the end of the document contain various records to substantiate Mr. Dershowitz's activities during those periods.

This is being sent to you as part of a process of negotiation hopefully leading to a resolution of the matter involving Mr. Dershowitz and Ms. [REDACTED]. It is based on your assurance that you will not reveal to Ms. [REDACTED] specific dates and locations, which might enable her to conform her account of events to Mr. Dershowitz's calendar.

Finally, you had mentioned that you wanted to send me a record of your notes from Monday's meeting to make sure that there were no inconsistencies. Please feel free to do so whenever is convenient.

Kind regards,

Nicholas Maisel