

#281849/clw

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

disc

CASE NO.: 08-CV-80811-CIV-
MARRA/JOHNSON

[REDACTED]

Plaintiff(s),

vs.

JEFFREY EPSTEIN and SARAH KELLEN,

Defendant(s).

_____ /

NOTICE OF SERVING
ANSWERS TO INTERROGATORIES

COMES NOW the Plaintiff, [REDACTED], by and through undersigned counsel, and hereby files this Notice with the Court that Answers to Interrogatories propounded by the Defendant, JEFFREY EPSTEIN, on January 16, 2009, have been furnished to the attorney for the Defendant.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by mail this 18th day of February, 2009, to: See attached list of counsel.

[REDACTED]



*cc: ramp
BDC*

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

ANSWERS TO INTERROGATORIES

1. What is the name and address of all persons answering or assisting in answering these interrogatories, and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?

ANSWER

█

c/o her attorneys:

█

2. List the names, business addresses, telephone and cell phone numbers, dates of employment, immediate supervisor (name and address) and rates of pay regarding all employers, including self-employment, for whom you have worked in the past 10 years; this includes listing all sources of income you have received. Answer this question by year, i.e. 1998-2009.

ANSWER

Objection. Irrelevant, immaterial and not reasonably calculated to lead to discovery of admissible evidence.

3. List all former names and when you were known by those names. State all addresses where you have lived for the past 10 years, the dates you lived at each address, your Social Security number, your date of birth, and, if you are or have ever been married, the name of your spouse or spouses. List any children by name, date of birth and the father's name and address. List the names and address of your parents and any brother or sister.

ANSWER

█



4. Have you ever been convicted of a crime, other than any juvenile adjudication, which under the law under which you were convicted was punishable by death or imprisonment in excess of 1 year, or that involved dishonesty or a false statement regardless of the punishment? If so, state as to each conviction the specific crime and the date and place of conviction.

ANSWER

█

5. Please provide the name, address, telephone number, place of employment and job title of any person who has, claims to have or whom you believe may have knowledge or information pertaining to any fact alleged in the pleadings (as defined in Federal Rule of Civil Procedure 7(a) filed in this action, or any fact underlying the subject matter of this action).

ANSWER

1. █
c/o her attorneys:

█

Subject matter: Plaintiff.

2. **Jeffrey Epstein**
c/o his attorneys:

Robert Critton, Esquire
Burman Critton Luttier & Coleman LLP

█

Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, P.A.

█

Bruce E. Reinhart, Esquire
Bruce E. Reinhart, P.A.

█

Subject matter: Defendant

3. █'s mother, █ and her brother, █
c/o █'s attorneys:

█

Subject matter: █'s involvement with Epstein.

4. █
(Address unknown)

Subject matter: Defendant.

5. **Jane Doe (Case No.: 1:93-cv-01109-KAM)**
c/o her attorney:

Theodore Leopold, Esquire
Leopold, Kuvin, P.A.



Subject matter: Victim of Epstein.

6. **Jane Doe (Case No.: 502008CA020614)**
c/o her attorney:

Isidro M. Garcia, Esquire
The Law Office of Brad Edwards & Associates, LLC



Subject matter: Victim of Epstein.

7. **Jane Doe █ (Case No.: 9:08-cv-80119-KAM)**
c/o her attorney:

Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.



Subject matter: Victim of Epstein.

8. **Jane Doe █ (Case No.: 9:08-cv-80232-KAM)**
c/o her attorney:

Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.



Subject matter: Victim of Epstein.

9. Jane Doe █ (Case No.: 9:08-cv-80381-KAM)
c/o her attorney:

**Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.**



Subject matter: Victim of Epstein.

10. Jane Doe █ (Case No.: 9:08-cv-80380-KAM)
c/o her attorney:

**Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.**



Subject matter: Victim of Epstein.

11. Jane Doe (Case No.: 9:08-cv-80804-KAM)
c/o her attorney:

**Theodore Leopold, Esquire
Leopold, Kuvin, P.A.**



Subject matter: Victim of Epstein.

12. Jane Doe █ (Case No.: 9:08-cv-80993-KAM)
c/o her attorney:

**Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.**

█

Subject matter: Victim of Epstein.

13. █ (Case No.: 502008CA025129XXXXMB Al
c/o her attorneys:

Jack Scarola, Esquire
Jack P. Hill, Esquire
Searcy Denney Scarola Barnhart & Shipley, P.A.

█

Subject matter: Victim of Epstein.

14. Jose Alessi
(Address unknown at this time)

Subject matter: Jeffrey Epstein's Butler.

15. █
Palm Beach Police Department

█

Subject matter: Investigator.

16. Lanaa Belohavek
Palm Beach County Prosecutors Office

█

Subject matter: Prosecutor.

17. Detective █, lead investigator

**Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480**
█

Subject matter: Investigator.

18.

█

Subject matter: Former boyfriend of a victim of Epstein.

19.

**Sgt. █
Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480**
█

Subject matter: Investigator.

20.

█

Subject matter: Plaintiff's former boyfriend.

21.

█, supervisor
█

**Subject matter: The incident which is the subject matter
of this lawsuit. Discovery is ongoing.**

22.

**Major █
Palm Beach County Sheriff's Office**
█

29. **Alfredo Rodriguez**
(Address unknown at this time)

Subject matter: Employee of Epstein.

30. Detective █
Palm Beach Police Department

█
Subject matter: Investigator

31. █ Esquire
First Assistant U.S. Attorney
U.S. Dept. of Justice

█
Subject matter: Federal prosecutor.

32. █, M.S.W.
Federal Bureau of Investigation

█
Subject matter: Investigator.

33.

34. █
Assistant U.S. Attorney
U.S. Dept. of Justice

████████████████████
████████████████████

Subject matter: Federal prosecutor.

35. ██████ friend of ██████'s mother
(Address will be provided upon receipt)

Subject matter: Friend of ██████'s mother.

36. ██████ friend of ██████'s mother
(Address will be provided upon receipt)

Subject matter: Friend of ██████'s mother

37. ██████, friend of ██████
(Address will be provided upon receipt)

Subject matter: Potential victim and friend of ██████

38. ████████████████████
(Address unknown at this time)

Subject matter: Associate of Epstein who may have been involved
in encounters between Epstein and ██████

6. Please state the specific nature and substance of the knowledge that you believe the person(s) identified in your response to interrogatory no. 5 may have.

ANSWER

Please see answer to Interrogatory #5

7. Were you suffering from physical infirmity, disability, disease, sickness, or psychiatric/psychological condition at the time of the incident(s) described in the complaint? If so, what was the nature of the infirmity, disability, or sickness?

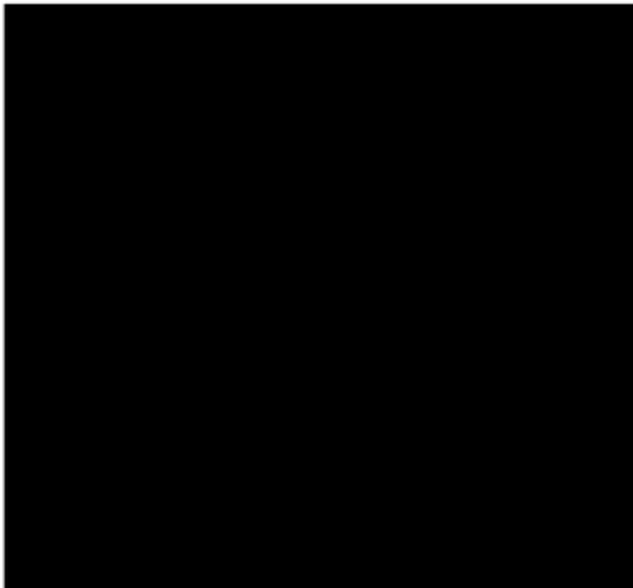
ANSWER

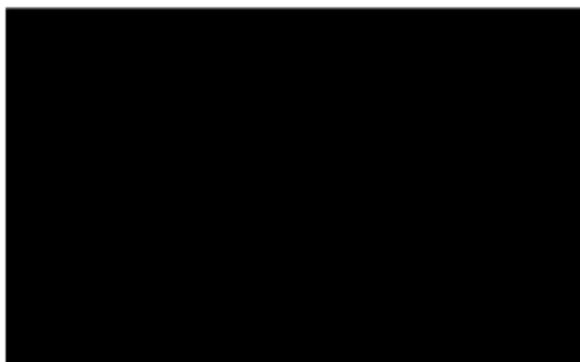
and each medical facility where you have received any treatment or examination for the injuries for which you seek damages in this case; and state as to each the date of treatment or examination and the injury or condition for which you were examined or treated.



12. List the names and business addresses of all other physicians, medical facilities, rehab facilities (drug, alcohol or psychiatric) or other health care providers including psychiatrist, psychologist, mental health counselor and chiropractors by whom or at which you have been examined or treated in the past 10 years; and state as to each the dates of examination or treatment and the condition or injury for which you were examined or treated.

ANSWER





13. State the name and address of every person known to you, your agents, or your attorneys, who has knowledge about, or possession, custody, or control of, any model, plat, map, drawing, motion picture, video tape, or photograph pertaining to any fact or issue involved in this controversy; and describe as to each, what item such person has, the name and address of the person who took or prepared it, and the date it was taken or prepared.

ANSWER

The FBI has photos taken of me at Jeffrey Epstein's home by █.
Jeffrey Epstein had a photo taken of me at his home by █.

14. Please state if you (or parents or guardian on your behalf) have ever been a party, either plaintiff or defendant, in a lawsuit other than the present matter, and, if so, state whether you were plaintiff or defendant, the nature of the action, and the date and court in which such suit was filed.

ANSWER



15. List all dates you allege you were at Mr. Epstein's home in Florida, include date, time arrived and left, the name(s) of anyone who went with you to the home when you were there, the time spent with Mr. Epstein and the name(s) and address of any individuals who were present in the home with Mr. Epstein and you.

ANSWER

From May or June of ██████ to August of ██████ I went to Mr. Epstein's home on average 2 times a week. There were weeks when I would go 4 times a week. All my visit dates were maintained by Jeffrey Epstein and his staff in a phone message book kept on a table by the phone in the kitchen.

Discovery is ongoing.

16. State in detail how you came to be at Mr. Epstein's home on each occasion, i.e. did someone bring you or ask you if you would or wanted to go; if so, state the name and address of that individual and what he/she told you and the purpose of your visit.

ANSWER

I was introduced to Jeffrey Epstein by my friend ██████ in 2002. I was to give Jeffrey Epstein a massage. I continued to provide massages up until August of ██████ I was transported to Jeffrey Epstein's house by Yellow Cab, provided by Jeffrey Epstein, ██████, my ex-boyfriend ██████, my mother ██████ and my brother ██████.

██████
(Address will be provided upon receipt)

17. State the amount of monies (or anything else of value, including gifts) you claim were given or paid to you by Mr. Epstein (or someone paid/gave you on his behalf and that person's name, address and phone number) by year from 2000-2006.

ANSWER

\$200-\$300 for a massage session at an average of 2 sessions a week from May or June of 2002 to August 2003.
\$500 for a photo taken by ██████ at Jeffrey Epstein's house
Paid for taxi cabs
Concert tickets-Incubus, delivered by two girls at the concert
Clothes and lingerie sent by FedEx
Book-Massage for Dummies
CD
Flowers
Express gift card

18. List separately the names, addresses and phone numbers of all males, excluding Mr. Epstein, with whom you have had sexual activity since age 10 (by year) up through your current age. Describe the nature of sexual activity, the date(s) and whether you received money or other consideration from the person.

ANSWER

Objection. Relevance and overbroad.

19. List separately the names, addresses and phone numbers of all males, excluding your claims against Mr. Epstein, whom you have claimed (formally or informally) committed sexual assault or battery on you since age 10 (by year) up through your current age. Describe the nature of sexual assault or battery, the date(s) and whether you received money or other consideration from the person.

ANSWER

██████████

20. State the names, addresses and phone numbers of all males, excluding your claims against Mr. Epstein, whom you have claimed (formally or informally) committed lewd or lascivious conduct to you since age 10 (by year) up through your current age. Describe the lewd or lascivious conduct, the date and whether you received money or other consideration from the person.

ANSWER

██████████

21. State the names, addresses and phone numbers of all males, excluding your claims against Mr. Epstein, whom you have claimed (formally or informally) committed lewd or lascivious exhibition to you since age 10 (by year) up through your current age. Describe the lewd or lascivious exhibition, the date and whether you received money or other consideration from the person

ANSWER

██████████

22. List in detail all discussions/interviews which you had with any representative

from FBI, U.S. Attorneys' Office, State Attorneys' Office (Palm Beach County), Palm Beach Sheriff's Office and Palm Beach Police Department regarding your meetings with Mr. Epstein. Include dates, who was present, the details of what was discussed, whether a court reporter was present and whether a taped statement was taken or whether you provided a written statement.

ANSWER

I was interviewed by the FBI and a State Attorney, they have my statement.

23. State the names, addresses, ages, phone numbers and dates of all females whom you claim were brought by you to Mr. Epstein's home to give him a massage or for any other reason. As to each female, state the amount of money you claim you were paid to bring each female.

ANSWER

█ Age: 22
West Palm Beach, FL.
I was paid \$100.00

24. Please list each time you were interviewed by any state or federal law enforcement agent or prosecutor, who was present, whether notes were taken, and what you recall saying to them.

ANSWER

I do not recall who interviewed me. This information would be available in the FBI and Prosecutors office. They took notes and I was not provided with a copy of those notes.

25. Please describe any statements made to you by any federal or state law enforcement agent or prosecutor regarding the availability of civil remedies against Mr. Epstein and regarding whether there would be any benefit from your voluntary cooperation with law enforcement.

ANSWER

None

█ vs. Epstein, et al.
Case No.: 08-CV-80811-CIV-MARRA/JOHNSON
Plaintiff's Answers to Defendant's First Interrogatories

█

Signature of Answering Party

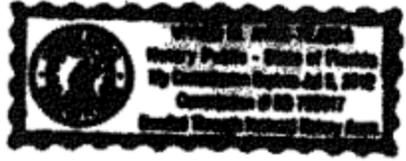
STATE OF Florida)

COUNTY OF Palm Beach)

The foregoing instrument was acknowledged before me this 17 day of February, 2009
by █ who is personally known to me or who has produced
_____ (type of identification) as identification and who did/did
not take an oath.



Notary Public
State of Florida at Large
My Commission expires:
Commission No:



SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

COUNSEL LIST

Jack A. Goldberger
Atterbury, Goldberger & Weiss, P.A.



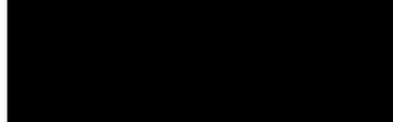
Attorneys for Jeffrey Epstein

Bruce E. Reinhart, Esquire
Bruce E. Reinhart, P.A.



Attorneys for ██████████

Robert Critton
Burman Critton Luttier & Coleman LLP



Attorneys for Jeffrey Epstein



Attorneys for Party