

#281849/clw

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

C.M.A.,

Plaintiff(s),

vs.

JEFFREY EPSTEIN and SARAH KELLEN,

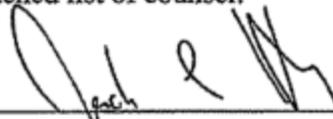
Defendant(s).

_____ /

NOTICE OF SERVING
ANSWERS TO INTERROGATORIES

COMES NOW the Plaintiff, C.M.A., 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.



JACK SCAROLA
Florida Bar No.: 169440
JACK P. HILL
Florida Bar No.: 0547808
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9410
Attorney for Plaintiff(s)



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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.M.A.
c/o her attorneys:
Jack Scarola, Esq. and Jack P. Hill, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409

With the assistance of her counsel, Searcy Denney Scarola Barnhart & Shipley, P.A. and Richard Willits, P.A.

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

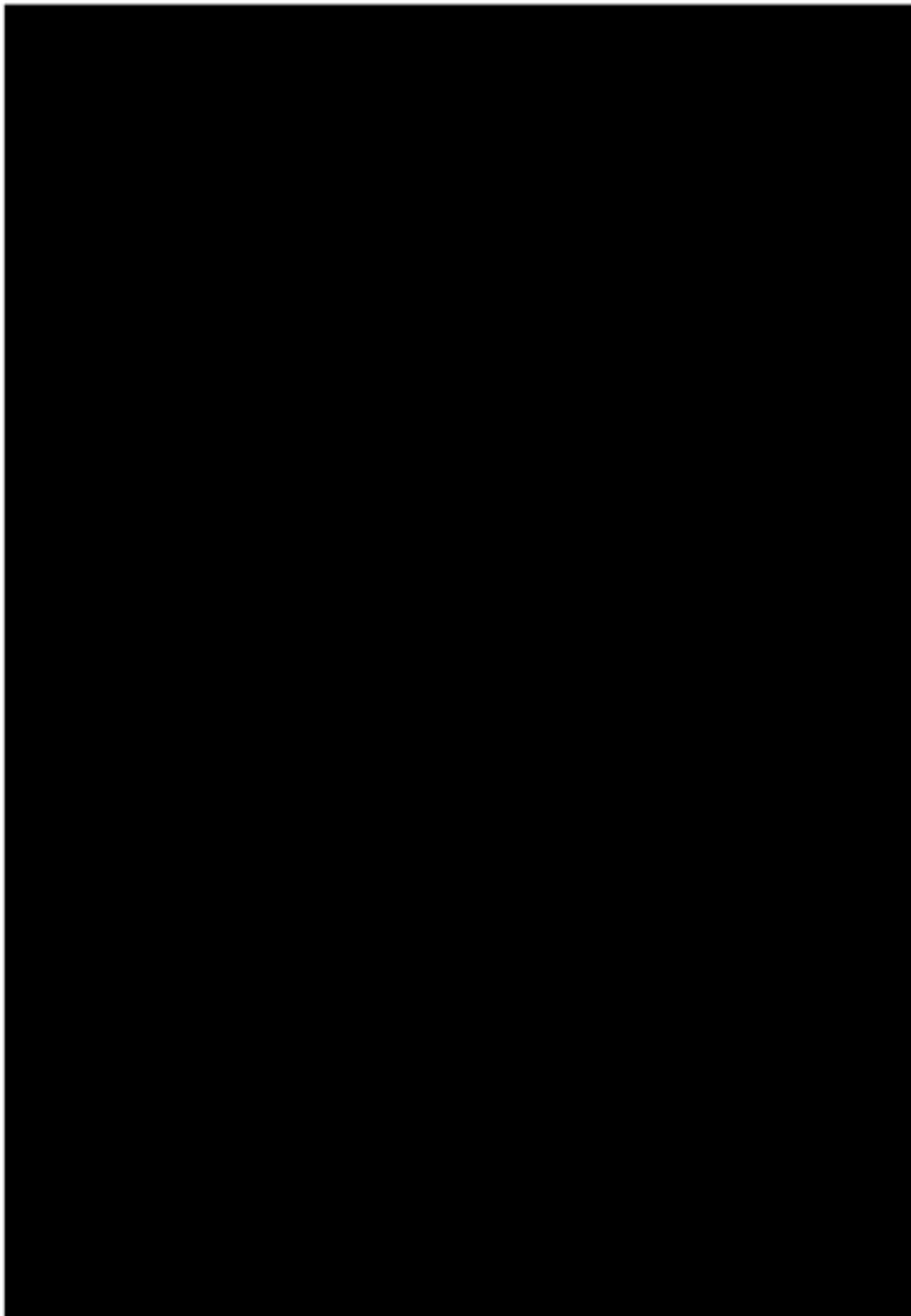
Objection. Irrelevant, immaterial and not reasonably calculated to lead to discovery of admissible evidence.

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

[REDACTED]

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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

No

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.M.A.**

c/o her attorneys:

**Jack Scarola, Esq. and Jack P. Hill, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409
Tel: (561) 686-6300**

**Richard Willits, Esq.
Richard H. Willits, P.A.
2290 10th Avenue North, Suite 404
Lake Worth, FL 33461
Tel: (561) 582-7600**

Subject matter: Plaintiff.

2. **Jeffrey Epstein**

c/o his attorneys:

**Robert Critton, Esquire
Burman Critton Luttier & Coleman LLP**

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**515 North Flagler Drive, Suite 400
West Palm Beach, FL 33414
Tel: (561) 842-2820**

**Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South
West Palm Beach, FL 33401
Tel: (561) 863-9100**

**Bruce E. Reinhart, Esquire
Bruce E. Reinhart, P.A.
250 South Australian Avenue
Suite 1400
West Palm Beach, FL 33401
Tel: (561) 202-6360**

Subject matter: Defendant

3.

[REDACTED]
c/o C.M.A.'s attorneys:

**Jack Scarola, Esq. and Jack P. Hill, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409
Tel: (561) 686-6300**

**Richard Willits, Esq.
Richard H. Willits, P.A.
2290 10th Avenue North, Suite 404
Lake Worth, FL 33461
Tel: (561) 582-7600**

Subject matter: C.M.A.'s involvement with Epstein.

**4. Sarah Kellen
(Address unknown)**

Subject matter: Defendant.

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

Theodore Leopold, Esquire
Leopold, Kuvin, P.A.
2925 P.G.A. Boulevard, Suite 200
Palm Beach Gardens, FL 33410
Tel: (561) 515-1400

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
2028 Harrison Street, Suite 202
Hollywood, FL 33020
Tel: (954) 414-8033

Subject matter: Victim of Epstein.

7. **Jane Doe #2 (Case No.: 9:08-cv-80119-KAM)**
c/o her attorney:

Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: (305) 931-2200

Subject matter: Victim of Epstein.

8. **Jane Doe #3 (Case No.: 9:08-cv-80232-KAM)**
c/o her attorney:

Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: (305) 931-2200

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Subject matter: Victim of Epstein.

- 9. Jane Doe #5 (Case No.: 9:08-cv-80381-KAM)
c/o her attorney:**

**Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: (305) 931-2200**

Subject matter: Victim of Epstein.

- 10. Jane Doe #4 (Case No.: 9:08-cv-80380-KAM)
c/o her attorney:**

**Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: (305) 931-2200**

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.
2925 P.G.A. Boulevard, Suite 200
Palm Beach Gardens, FL 33410
Tel: (561) 515-1400**

Subject matter: Victim of Epstein.

- 12. Jane Doe #7 (Case No.: 9:08-cv-80993-KAM)
c/o her attorney:**

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

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**18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: (305) 931-2200**

Subject matter: Victim of Epstein.

- 13. A.C. (Case No.: 502008CA025129XXXMB Al
c/o her attorneys:**

**Jack Scarola, Esquire
Jack P. Hill, Esquire
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409
Tel: (561) 686-6300**

Subject matter: Victim of Epstein.

- 14. Jose Alessi
(Address unknown at this time)**

Subject matter: Jeffrey Epstein's Butler.

- 15. [REDACTED]
Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480
Tel: (561) 838-5480**

Subject matter: Investigator.

- 16. Lanaa Belohavek
Palm Beach County Prosecutors Office
401 North Dixie Highway
West Palm Beach, FL 33401
Tel: (561) 355-7100**

Subject matter: Prosecutor.

- 17. [REDACTED], lead investigator**

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**Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480
Tel: (561) 838-5480**

Subject matter: Investigator.

18. **Anthony Figueroa
155 Santiago Street
Royal Palm Beach, FL 33411-1228**

Subject matter: Former boyfriend of a victim of Epstein.

19. **[REDACTED]
Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480
Tel: (561) 838-5480**

Subject matter: Investigator.

20. **Shawn W. Haught
1603 Plantation Lane
West Palm Beach, FL 33417**

Subject matter: Plaintiff's former boyfriend.

21. **Tony Higgins, supervisor
Sanitation Bureau of the Town of Palm Beach
3101 N.W. 16th Terrace
Pompano Beach, FL 33064
Tel: (877) 46-WASTE**

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

22. **[REDACTED]
Palm Beach County Sheriff's Office
3228 Gun Club Road
West Palm Beach, FL 33406
(561) 666-3000**

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Subject matter: Investigator.

23. [REDACTED]
(Address will be provided upon receipt)

Subject matter: Victim and friend of C.M.A.

24. Ghislane Maxwell c/o Ghislane Corp.
3580 Brillo Way
Palm Beach, FL 33480

Subject matter: Associate of Epstein.

25. Susan Pope
Parent Child Center
West Palm Beach, FL

Subject matter: Counselor at Parent Child Center.

26. [REDACTED]
Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480
Tel: (561) 838-5480

Subject matter: Investigator.

27. [REDACTED]
Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480
Tel: (561) 838-5480

Subject matter: Investigator.

28. Haley Robson
(Address unknown at this time)

Subject matter: Associate of Epstein who facilitated introductions with various victims.

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

Subject matter: Employee of Epstein.

30. [REDACTED]
Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480
Tel: (561) 838-5480

Subject matter: Investigator

31. [REDACTED]
Benney Simon, Esquire
First Assistant U.S. Attorney
U.S. Dept. of Justice
500 South Australian Avenue
Suite 400
West Palm Beach, FL 33401
Tel: (561) 820-8711

Subject matter: Federal prosecutor.

32. [REDACTED]
Federal Bureau of Investigation
505 South Flagler Drive, Suite 500
West Palm Beach, FL 33401

Subject matter: Investigator.

33. **Dr. Thys**
Address will be provided upon receipt
West Palm Beach

Subject matter: C.M.A.'s physician.

34. [REDACTED]
Assistant U.S. Attorney
U.S. Dept. of Justice
500 South Australian Avenue

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**Suite 400
West Palm Beach, FL 33401
Tel: (561) 820-8711**

Subject matter: Federal prosecutor.

35. [REDACTED]
(Address will be provided upon receipt)

Subject matter: Friend of C.M.A.'s mother.

36. [REDACTED]
(Address will be provided upon receipt)

Subject matter: Friend of C.M.A.'s mother

37. [REDACTED]
(Address will be provided upon receipt)

Subject matter: Potential victim and friend of C.M.A.

38. **Nadia Marcinkova**
(Address unknown at this time)

**Subject matter: Associate of Epstein who may have been involved
in encounters between Epstein and C.M.A.**

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

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School behavioral problems, received counseling prior to the incident.

8. Did you consume any alcoholic beverages or take any drugs or medications within 12 hours before the time of each incident(s) described in the complaint? If so, state the type and amount of alcoholic beverages, drugs, or medication which were consumed, and when (dates) and where you consumed them.

ANSWER

1. **On one occasion I had taken "Morning Glory" and "Angel Trumpets". I do not recall the date.**
 2. **On another occasion I used cocaine powder. I do not recall the date.**
9. Describe each injury (physical, emotional, mental) for which you are claiming damages in this case, specifying the part of your body that was injured, the nature of the injury and as to any injuries you contend are permanent, the effects on you that you claim are permanent.

ANSWER

I have bi-polar disorder and manic depression. I lost my self-esteem. I began cutting myself on my arms and legs and developed drug problems. Permanent injuries are psychological.

10. Please state each item of damage that you claim, and include in your answer: the count to which the item of damages relates; the factual basis for each item of damages; and an explanation of how you computed each item of damages, including any mathematical formula used.

ANSWER

I am claiming compensation for mental anguish, mental pain, psychic trauma, and loss of enjoyment of life. These damages will be evaluated by a jury who will provide their own methods of computation in an amount of at least the statutory minimum established by 18 U.S.C.A. § 2255.

Discovery is ongoing.

11. List the names and business addresses of each physician (including psychiatrist, psychologist, chiropractor or medical provider) who has treated or examined you,

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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.

ANSWER

**Dr. Serge Thys (Psychiatrist) Date: I do not recall the date. I would defer
2151 45th Street to the Doctor's records.
West Palm Beach, FL. 33407**

**Susan Pope (Counselor/Therapist) Date: Since high school. Ongoing.
Parent Child Center
2001 W. Blue Heron Boulevard**

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

**Good Samaritan Hospital (3/12/04, 3/25/08)
Child Birth
1309 N Flagler Dr
West Palm Beach, FL 33401**

**St. Mary's Hospital (4/07)
DNC
901 45th Street
West Palm Beach, FL 33407**

**Gloria C. Hakkarainen, MD
Ob/Gyn
2925 10th Avenue North, Suite 305
Palm Springs, FL. 33461**

**Theodore Ritofa, DDS
Dentist**

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**3401 South Federal Highway
Delray Beach, FL. 33483**

**Palm Beach County Healthcare Department
Flu Shots
45th Street
West Palm Beach, FL. 33407**

**FAU Wellness Center
1650 Osceola Drive
West Gate, FL. 33407**

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 Sarah Kellen.
Jeffrey Epstein had a photo taken of me at his home by Sarah Kellen.**

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

No

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

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From May or June of 2002 to August of 2003 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 Virginia in 2002. I was to give Jeffrey Epstein a massage. I continued to provide massages up until August of 2003. I was transported to Jeffrey Epstein's house by Yellow Cab, provided by Jeffrey Epstein, Virginia, my ex-boyfriend Shawn Haught, my mother [REDACTED]

**Virginia
(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 Sarah Kellen 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**

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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

None.

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

None

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

None

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

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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

**A.L. 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

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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 Carolyn Andriano 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:



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COUNSEL LIST

Jack A. Goldberger
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Attorneys for Jeffrey Epstein

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Attorneys for Sarah Kellen

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515 North Flagler Drive, Suite 400
West Palm Beach, FL 33414
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Attorneys for Jeffrey Epstein

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Attorneys for Party