

MARTIN G. WEINBERG, [REDACTED]
ATTORNEY AT LAW

20 PARK PLAZA, SUITE 1000
BOSTON, MASSACHUSETTS 02116

EMAIL ADDRESSES:

[REDACTED]
[REDACTED]

[REDACTED]

FAX [REDACTED]

NIGHT EMERGENCY:

[REDACTED]

April 23, 2015

Via Email and U.S. Mail

John Zucker
Assistant Legal Counsel
Office of Legal Counsel
77 W 66TH St, Room 1628
New York, NY 10023

Re: Good Morning America and Night Line interview with Jane Doe 3 (VR)

Dear Mr. Zucker:

I represent Jeffrey Epstein. I have been informed by Producer James Hill that an interview, conducted by a Good Morning America co-host, of a woman known in court papers as Jane Doe 3 (Mr. Hill informed me that she was waiving whatever rights to anonymity she might assert but I will, because of certain legal obligations, refer to her as Jane Doe 3) includes a series of accusations regarding alleged conduct of my client that Jane Doe 3 states occurred starting in the summer of 1999 i.e. 16 years ago and ending 3 years later i.e. 13 years ago. I urge ABC first to consider whether these accusations are even potentially newsworthy matters rather than simply the reformatting echoes of previous allegations, first made to the UK tabloids by Jane Doe 3 in 2011, allegations that were and remain largely uncorroborated, allegations that are often disputed by trustworthy evidence. A review of the filings in a pending Crime Victims Rights Act case (Jane Doe v. United States, 08-CV-80736-KAM) would show that the presiding Judge, upon reviewing a subset of the allegations you are considering airing, found them to be "redundant, immaterial, impertinent, or scandalous matter." A filed affidavit in that case from FBI Special Agent Timothy R. Slater reflects that when Jane Doe 3 was first interviewed she refused to cooperate with the investigation of Mr. Epstein declaring she wanted nothing to do with the matter. Now, it appears, ABC intends to provide her with a national platform to make allegations she declined to make when they could reasonably have been tested by federal law enforcement.

More specifically, ABC has the means to test certain of her allegations against third party evidence. She accused prominent lawyer and educator Alan Dershowitz of sexual misconduct. Professor Dershowitz has denied under oath that he ever engaged in any sexual act with Jane

Doe 3. I understand that Professor Dershowitz has offered Mr. Hill a tape recording that evidences that Jane Doe 3 was pressured into including Professor Dershowitz in her allegations even though she had never before named him and that indicates that Jane Doe 3 is intending to fund a Trust (and to receive funds herself) from a businessperson who would persuasively deny that he ever had any sexual contact with Jane Doe 3. Surely there is nothing in the background of Professor Dershowitz that would make him less credible than their uncorroborated accuser

Prince Andrew and the Royal Palace have also unequivocally denied similar allegations of sexual conduct by Prince Andrew. Their denials as well are entitled to weight in your determination whether your interviewee is entitled to disseminate her accusations to a national audience.

Jane Doe 3 claims she saw both former President Clinton (after January 20, 2001 and before the summer of 2002) and former Vice President Gore (and his wife) at Mr. Epstein's Virgin Island home. She claims to be 100% sure of this allegation. It is untrue. Neither Mr. Clinton nor the Gores were ever at Mr. Epstein's Virgin Island home. Secret Service records would reflect this. Virgin Island government records would confirm this. Your Producer, I believe, has been informed by reliable sources that former President Clinton has never been to Mr. Epstein's Virgin Island home. You could elicit the same denials from Mr. and Mrs. Gore either directly or by through their counsel. If Jane Doe 3 has lodged a false allegation against such prominent people – like a litmus test – the remainder of her narrative should be received with heightened skepticism, indeed with complete distrust.

We ask in an era where the media has on occasion gone too far in disseminating information that shatters people's (and institution's) reputations (e.g. the Rolling Stone and the University of Virginia) that you test Jane Doe 3's allegations about former President Clinton and, that unless there is support for these allegations, that you decline to air her interviews. It's not enough to "sanitize" the interview by withholding the specifically disputed portions; if she is not credible regarding a former President, then she is not a source that should be implicitly vouched for by providing her with a platform to make accusations that are sensational but not newsworthy.

Mr. Epstein has in fact pled guilty (in June of 2008) to specific charges that do not relate to Jane Doe 3. He has fully conformed to the responsibilities and obligations imposed on him in a Non-Prosecution Agreement he entered with the United States Attorney. He has settled civil litigation, all more than 5 years ago. He is attempting to restore his reputation by philanthropy and public service. To revive accusations of misconduct that date back 13-16 years, that are old not new, and that are disputed and defamatory in many respects, should not occur.

Mr. Epstein through this letter is putting ABC on notice that he would strongly consider filing a defamation suit if the interview, as it was summarized by Producer Hill, is aired.

Yours Truly,

/s/Martin G. Weinberg