

## The Florida Bar Inquiry/Complaint Form

Your Name: <u>Jeffrey Epstein</u>	Attorney's Name: <u>Spencer Kuvin, Esq.</u>
Address: <u>250 Australian Ave S., Suite 1404</u>	Address: <u>[REDACTED]</u>
City: <u>West Palm Beach</u> State: <u>FL</u>	City: <u>Palm Beach Gardens</u> State: <u>FL</u>
Phone: <u>[REDACTED]</u> Zip Code: <u>33401</u>	Phone: <u>[REDACTED]</u> Zip Code: <u>33410</u>
ACAP Reference No. _____	

**PART TWO:** The specific thing or things I am complaining about are:

1. I am the Defendant in the case styled B.B. v. Epstein, Case No. 502008CA037319XXXMB AB in the Fifteenth Judicial Circuit in and for Palm Beach County, Florida. On September 2, 2009 I attended my deposition, which was taken by Spencer Kuvin, Esq.

2. Spencer Kuvin, counsel for Plaintiff, B.B., took my deposition, which began at approximately 10:00 a.m.

3. Directly after asking me my name, Mr. Kuvin asked, “[i]s it true, sir, that you have what’s been described as an egg-shaped penis.” See Deposition Transcript attached as **Exhibit “A.”** Accordingly, Mr. Kuvin chose to immediately set the tone of the deposition in a sarcastic and demeaning manner in an effort to harass, embarrass, humiliate and intimidate me, thereby disregarding the entire deposition process. In an attempt to continue to embarrass, humiliate, harass and intimidate me, Mr. Kuvin continued with this line of questioning by referencing a document that Mr. Kuvin did not provide me or to my counsel and then asked the following: “[s]ir, according to the police department’s probable cause affidavit, one witness described your penis as oval shaped and claim[ed], when erect, it was thick towards the bottom but was thin and small - - towards the head portion, and called it egg-shaped . . . .” See Exhibit A. It was obvious from Mr. Kuvin’s tenor that

he did not intend to have a meaningful deposition. Instead, his goals were clear – (1) to embarrass, humiliate, intimidate and harass me; and (2) attempt to gain notoriety for himself and his firm.

4. Mr. Kuvin told one of my attorneys that he did not expect to make much money in this case, that he was a young lawyer and needed to market himself and get as much publicity as necessary for himself and his firm and that the case was another marketing method for himself and his firm. See Affidavit of Jack Goldberger, Esq. attached as **Exhibit B**. Nevertheless, Mr. Kuvin apparently subscribes to the old adage, “there is no such thing as bad publicity.”

5. To further his goal of embarrassing and humiliating me and gaining a tactical media advantage before trial, as well as his goal to market himself and his firm, Mr. Kuvin provided the media and/or the Palm Beach Post with a copy of my video deposition, which was posted on the Palm Beach Post’s website (<http://www.page2live.com/2009/09/17/perv-epstein-wont-talk-about-his-penis/>) and other sites on the internet, such as <http://www.youtube.com/watch?v=adCScCVZ9Rw&feature=related> and [http://www.huffingtonpost.com/2009/09/17/egg-shaped-penis-jeffrey\\_n\\_290464.html](http://www.huffingtonpost.com/2009/09/17/egg-shaped-penis-jeffrey_n_290464.html), as well as numerous other sites. As the bar will see from the titles and comments in response to the article and video provided to the media by Mr. Kuvin, my rights to a fair trial have been prejudiced here in Palm Beach County.

6. Mr. Kuvin’s conduct is improper and violates Florida Rule of Professional Conduct 4-3.6 – Trial Publicity. Mr. Kuvin has obstructed my right to obtain a fair trial by virtue of his interviews and meeting with the media, which were done for the sole purpose of gaining media attention for Mr. Kuvin. In fact, Mr. Kuvin’s actions may be in direct

conflict with his client's directive and wish in connection with her requests to remain confidential and travel under the pseudonym, B.B., in this above referenced matter.

**PART THREE:** The witnesses in support of my allegations are:

1. Jack Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Ave South, Suite 1400, West Palm Beach, FL 33401.
2. Robert D. Critton and Michael J. Pike of Burman, Critton, Luttier and Coleman, 303 Banyan Boulevard, West Palm Beach, Florida 33414. Suite 400.

**PART FOUR:** Under penalty of perjury, I declare the foregoing facts are true, correct and complete

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Signature

Date