

JEFFREY EPSTEIN,

IN THE CIRCUIT COURT OF THE  
FIFTEENTH JUDICIAL CIRCUIT IN  
AND FOR PALM BEACH COUNTY,  
FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JUDGE: CROW

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually,  
and BRADLEY J. EDWARDS,  
individually.

Defendants.

\_\_\_\_\_/

**PLAINTIFF/COUNTER-DEFENDANT EPSTEIN'S RESPONSES TO  
DEFENDANT/COUNTER-PLAINTIFF'S REQUESTS FOR ADMISSIONS**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Rule 1.350 of the *Florida Rules of Civil Procedure* hereby files his responses to Defendant/Counter-Plaintiff Bradley Edward's Requests for Admissions to Jeffrey Epstein as follows:

1. Admitted.
2. Admitted.
3. Objection. This Request for Admission requires a response which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). I have a substantial

and reasonable basis for concern that these statements of fact that are testimonial in nature could reasonably furnish a “link in the chain of evidence” that could be used to prosecute me in criminal proceedings. *See Hoffman v. United States*, 341 U.S. 479, 486 (1951). I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth, Sixth and Fourteenth Amendment rights as guaranteed by the United States Constitution.

4. Objection. This Request for Admission requires a response which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). I have a substantial and reasonable basis for concern that these statements of fact that are testimonial in nature could reasonably furnish a “link in the chain of evidence” that could be used to prosecute me in criminal proceedings. *See Hoffman v. United States*, 341 U.S. 479, 486 (1951). I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth, Sixth and Fourteenth Amendment rights as guaranteed by the United States Constitution.

5. Objection. This Request for Admission requires a response which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). I have a substantial and reasonable basis for concern that these statements of fact that are testimonial in nature could reasonably furnish a “link in the chain of evidence” that could be used to prosecute me in criminal proceedings. *See Hoffman v. United States*, 341 U.S. 479, 486 (1951). I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth, Sixth and Fourteenth Amendment rights as guaranteed by the United States Constitution.

6. Objection. This Request for Admission requires a response which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). I have a substantial and reasonable basis for concern that these statements of fact that are testimonial in nature could reasonably furnish a “link in the chain of evidence” that could be used to prosecute me in criminal proceedings. *See Hoffman v. United States*, 341 U.S. 479, 486 (1951). I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth, Sixth and Fourteenth Amendment rights as guaranteed by the United States Constitution.

7. Objection. This Request for Admission requires a response which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). I have a substantial and reasonable basis for concern that these statements of fact that are testimonial in nature could reasonably furnish a “link in the chain of evidence” that could be used to prosecute me in criminal proceedings. *See Hoffman v. United States*, 341 U.S. 479, 486 (1951). I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth, Sixth and Fourteenth Amendment rights as guaranteed by the United States Constitution.

8. Objection. This Request for Admission requires a response which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). I have a substantial and reasonable basis for concern that these statements of fact that are testimonial in nature could reasonably furnish a “link in the chain of evidence” that could be used to prosecute me in criminal proceedings. *See Hoffman v. United States*, 341 U.S. 479, 486 (1951). I cannot provide answers/responses to questions relating to my financial history

and condition without waiving my Fifth, Sixth and Fourteenth Amendment rights as guaranteed by the United States Constitution.

9. Objection. This Request for Admission requires a response which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). I have a substantial and reasonable basis for concern that these statements of fact that are testimonial in nature could reasonably furnish a “link in the chain of evidence” that could be used to prosecute me in criminal proceedings. *See Hoffman v. United States*, 341 U.S. 479, 486 (1951). I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth, Sixth and Fourteenth Amendment rights as guaranteed by the United States Constitution.

10. Objection. This Request for Admission requires a response which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). I have a substantial and reasonable basis for concern that these statements of fact that are testimonial in nature could reasonably furnish a “link in the chain of evidence” that could be used to prosecute me in criminal proceedings. *See Hoffman v. United States*, 341 U.S. 479, 486 (1951). I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth, Sixth and Fourteenth Amendment rights as guaranteed by the United States Constitution.

11. Objection. This Request for Admission requires a response which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). I have a substantial and reasonable basis for concern that these statements of fact that are testimonial in nature could reasonably furnish a “link in the chain of evidence” that could be used to prosecute me in criminal proceedings. *See Hoffman v. United States*, 341 U.S. 479, 486

(1951). I cannot provide answers/responses to questions relating to my financial history and condition without waiving my Fifth, Sixth and Fourteenth Amendment rights as guaranteed by the United States Constitution.

12. Objection. This Request for Admission requires a response which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). I have a substantial and reasonable basis for concern that these statements of fact that are testimonial in nature could reasonably furnish a “link in the chain of evidence” that could be used to prosecute me in criminal proceedings. *See Hoffman v. United States*, 341 U.S. 479, 486 (1951). I cannot provide answers/responses to questions relating to my financial information without waiving my Fifth, Sixth and Fourteenth Amendment rights as guaranteed by the United States Constitution.

13. I admit that I was sentenced by a State Court Judge to the Palm Beach County Jail for the charges to which I plead.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served upon Jack Scarola, Esq., and Bradley J. Edwards, Esq., via Electronic Service, this March 27, 2013.

\_\_\_\_\_  
Tonja Haddad Coleman, Esq.  
Fla. Bar No.: 0176737  
LAW OFFICES OF TONJA HADDAD, PA  
315 SE 7<sup>th</sup> Street  
Suite 301  
Fort Lauderdale, Florida 33301



