

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA
CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and PAUL G. CASSELL,

Plaintiff(s),

vs.

ALAN M. DERSHOWITZ,

Defendant(s).

**RESPONSE TO FOURTH SET OF DOCUMENT REQUESTS
TO BRADLEY J. EDWARDS**

Plaintiff, Bradley J. Edwards, by and through his undersigned attorneys and pursuant to Rule 1.350, Florida Rules of Civil Procedure, hereby responds to Defendant, Alan M. Dershowitz's, Fourth Set of Document Requests to Bradley J. Edwards, dated December 11, 2015 as follows:

- 1. Please see attached Statement by [REDACTED] to the Federal Bureau of Investigation [Redacted]

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 13th day of Jan., 2016.



Jack Scarola
Florida Bar No.: 169440
Attorney E-Mail(s): [REDACTED] and
mep@searcylaw.com
Primary E-Mail: [REDACTED]m
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Plaintiffs

Edwards, Bradley vs. Dershowitz
Case No.: CACE 15-000072
Response to Fourth Set of Document Requests to Bradley J. Edwards

COUNSEL LIST

Sigrid Stone McCawley, Esquire

[REDACTED]
[REDACTED]

Boies Schiller & Flexner, LLP
401 E Las Olas Boulevard., Suite 1200
Fort Lauderdale, FL 33301
Phone: [REDACTED]

Thomas Emerson Scott, Jr., Esquire

[REDACTED]
[REDACTED]

Cole Scott & Kissane P.A.
9150 S Dadeland Boulevard, Suite 1400
Miami, FL 33156
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Alan M. Dershowitz

Bradley J. Edwards, Esquire

[REDACTED]
[REDACTED]

Farmer Jaffe Weissing Edwards Fistos &
Lehrman, P.L.
425 N Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]

Kenneth A. Sweder, Esquire

[REDACTED]m
Sweder & Ross, LLP
131 Oliver Street

Boston, MA 02110

Phone: [REDACTED]
Fax: [REDACTED]

Attorneys for Alan M. Dershowitz

Ashley Eiler, Esquire

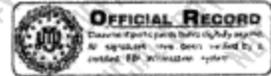
[REDACTED]
Mary E. Borja, Esquire

[REDACTED]
Richard A. Simpson, Esquire
RSimpson@wileyrein.com
Wiley Rein, LLP
1776 K Street NW
Washington, DC 20006

Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Alan M. Dershowitz

Joni J. Jones, Esquire

[REDACTED]
Assistant Utah Attorney General
160 E 300 S
Salt Lake City, UT 84114
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Paul Cassell



FEDERAL BUREAU OF INVESTIGATION

Date of entry 07/05/2013

[redacted] maiden name [redacted], date of birth [redacted] Social Security Account Number [redacted] United States Citizen and Australian Permanent Resident, residence New South Wales, Australia, 2261 was interviewed at the United States Consulate in Sydney, Australia. [redacted] was advised of the identity of the interviewing agents and purpose of the interview. Present during the interview was Federal Bureau of Investigation Special Agent [redacted] [redacted] and via telephone, Assistant United States Attorney [redacted] [redacted] provided the following information:

b6
b7C

[redacted] was born in Sacramento, California to parents [redacted] [redacted] date of birth [redacted] currently resides in [redacted] and [redacted] date of birth [redacted] [redacted] currently resides in [redacted] [redacted] moved to Palm Beach County, Florida with her parents when she was four years old and returned to California at age 11. She returned to Florida at age 13 and was placed in a rehabilitation or foster care facility in West Palm Beach, Florida.

b6
b7C

[redacted] ran away from the rehabilitation facility when she was approximately 14 years old, and while living on the streets in Miami, Florida, she met [redacted]

b6
b7C

[redacted]

[redacted] was training [redacted] to be an escort [redacted] [redacted] gave [redacted] a life off of the streets which made her feel

Investigation on 03/17/2011 at Sydney, Australia (In Person)
 File # 31E-MM-108062 Date drafted 07/05/2013
 by [redacted]

b6
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

31E-MM-108062

Continuation of FD-302 of [redacted]

, On 03/17/2011, Page 2 of 12

like she was locked into the relationship. [redacted] gave [redacted] pharmaceutical drugs toward the end of their relationship.

b6
b7C

[redacted]

[redacted] relationship with [redacted] ended while she was at a private ranch near Ocala, Florida. [redacted] telephonically contacted a childhood friend, [redacted] from a telephone at the ranch. [redacted] knew [redacted] from elementary school and called him at the home telephone of his parents [redacted] GIUFFRE told [redacted] she was very lonely, and [redacted] asked her why she did not leave [redacted]

b6
b7C

[redacted] telephone conversation with [redacted] the recreational vehicle (RV) [redacted] was staying in at the ranch [redacted] did not strike her [redacted] pack her belongings and told her she was going to live with another man.

[redacted]

[redacted] felt that she was sent to [redacted] but did not know the specifics of the arrangement. [redacted] engaged in sexual activity with [redacted] who was described as a white male [redacted] stated [redacted] stayed with [redacted] for approximately one or two weeks before the police located her and returned her to her parents. [redacted] was interviewed by a male detective. [redacted] parents were still married at the time and lived near [redacted] Florida. [redacted] believed there was an FBI investigation related to [redacted] She never saw [redacted] again after [redacted]

b6
b7C

In approximately June 1998 or 1999, [redacted] began working at Donald Trump's Mar-A-Lago Club in Palm Beach, Florida. [redacted] father [redacted] was able to help her gain employment as a baby sitter and later as a locker room attendant at the club. [redacted] started studying for her GED and wanted to become a massage therapist. In August, [redacted] was reading an anatomy/massage book and was approached by [redacted]

[redacted] and help her get her masseuse accreditation. [redacted]

b6
b7C

[redacted] consulted her father about the opportunity and at approximately 5:00 p.m. the same day, her father drove her to a residence at [redacted]

31E-MM-108062

Continuation of FD-302 of [redacted], On 03/17/2011, Page 3 of 12

[redacted] Florida. [redacted] spoke with [redacted] father and told him it was a wonderful opportunity for [redacted] met [redacted] [redacted] also known as [redacted] was led upstairs [redacted]

b6
b7C

Once upstairs in [redacted] [redacted] instructed [redacted] to wash her hands prior to beginning the massage. The massage began [redacted] demonstrated massage techniques to [redacted]

b6
b7C

During the course of the massage, [redacted] questioned [redacted] about her past, including her time as a runaway. [redacted] was also asked if she took birth control.

b6
b7C

[redacted] [redacted] was given instruction and began kissing [redacted]

b6
b7C

[redacted]

b6
b7C

At the conclusion, [redacted] instructed [redacted] to obtain two warm wash clothes. One wash cloth was used to clean [redacted] second was [redacted] to help him relax. [redacted] described [redacted] and [redacted] then moved to the steam room and shower where [redacted] massaged [redacted] with soap and a loofah in the shower.

b6
b7C

At the conclusion of the shower, [redacted] went downstairs and [redacted] [redacted] Arrangements were made for [redacted] to return to the house the following day after work. [redacted] cellular phone number was given to [redacted] [redacted]

b6
b7C

31E-MM-108062

Continuation of FD-302 of [REDACTED] L. [REDACTED], On 03/17/2011, Page 4 of 12

The same routine and pattern of massages and sexual activity between [REDACTED] and [REDACTED] continued for between one and two weeks. At times, [REDACTED]

b6
b7C

[REDACTED] offered [REDACTED] the option to quit her job at Mar-A-Lago and travel [REDACTED]. There was also discussion of [REDACTED] receiving massage training. [REDACTED] was to be paid \$200.00 per day for travel and \$200.00 per hour for massages.

Early in her relationship with [REDACTED] [REDACTED] met [REDACTED]

b6
b7C

[REDACTED] and was introduced as [REDACTED] assistant.

[REDACTED] soon began traveling [REDACTED]. For the initial six months, [REDACTED] traveled [REDACTED] around the United States and Caribbean, including California, New York City, New Mexico, and various business trips. During those trips, [REDACTED]

b6
b7C

Six to nine months after [REDACTED] began working for [REDACTED]

[REDACTED] was introduced to [REDACTED] LNU, [REDACTED] in [REDACTED]

b6
b7C

Florida. [REDACTED] at the time. [REDACTED] met the couple at a condominium next to the [REDACTED]. The condominium was bought [REDACTED] and was a [REDACTED]. In the condominium, [REDACTED] provided a normal massage to [REDACTED] LNU. Shortly thereafter, [REDACTED] LNU provided an erotic massage to [REDACTED]

and [REDACTED]

[REDACTED] cleaned [REDACTED]. She was paid cash [REDACTED]. In addition, [REDACTED] paid [REDACTED]. [REDACTED] was 16 years old at the time [REDACTED]

[REDACTED] advised [REDACTED] introduced her to the drug Xanax. She explained that Xanax helped her escape from reality but allowed her to still function normally. Xanax helped her go forward with what she was doing with [REDACTED] and others. Her habit went from two pills per day up to eight pills per day.

b6
b7C

[REDACTED] second client was an academic of some sort described as an older American male [REDACTED] sent [REDACTED] from Miami International Airport to [REDACTED] by commercial airline. [REDACTED] was picked up at the airport by [REDACTED] and then taken to the island by boat. [REDACTED]

b6
b7C

31E-MM-108062

Continuation of FD-302 of [redacted] L. [redacted], On 03/17/2011, Page 5 of 12

[redacted] pointed out that [redacted] instructed [redacted] to entertain the client [redacted] and wanted to ride jet skis and participate in other island activities [redacted] [redacted] spent two days on the island with the client. [redacted] assumes the client also traveled [redacted] commercially.

b6
b7C

During the following several months, [redacted] traveled internationally [redacted] Prior to her traveling abroad, [redacted] assisted [redacted] in getting her passport. [redacted] got passport photographs of herself and provided them to [redacted] The remaining paperwork was taken care of by [redacted] [redacted] traveled to Paris, France, the South of France, London, England, Africa, and Spain. While in Paris, [redacted] recalled staying at a hotel overlooking the Champs-Elysees. While traveling, [redacted] traveled on [redacted] [redacted] a black plane. During the international travel, [redacted] At times, [redacted] would [redacted]

b6
b7C

[redacted] Rarely a day would pass [redacted]

[redacted] contacted [redacted] through [redacted] and wanted to talk to [redacted] about [redacted] [redacted] and offered [redacted] a contract. [redacted] agreed to the contract for her story and was paid \$140,000 for the story, \$10,000 when the article was printed, and another \$10,000 to be wired into [redacted] account in May 2011. The contract prevented [redacted] from talking to any other press for a specified period. [redacted] advised that she provided [redacted] with detailed information [redacted]

b6
b7C

[redacted]

b6
b7C

b6
b7C

31E-MM-108062

Continuation of FD-302 of [REDACTED]

, On 03/17/2011, Page 6 of 12

[REDACTED]

b6
b7C

[REDACTED]

[REDACTED] At age 16, [REDACTED] met [REDACTED]

b6
b7C

[REDACTED] believed she and [REDACTED] were approximately the same age. [REDACTED] and [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] would dress [REDACTED]

b6
b7C

[REDACTED]

[REDACTED]

[REDACTED]

b6
b7C

[REDACTED]

[REDACTED], though [REDACTED] explained GIUFFRE provided an [REDACTED]

b6
b7C

[REDACTED] described [REDACTED]

[REDACTED]

An unknown individual [REDACTED] GIUFFRE saw [REDACTED] when she arrived at [REDACTED]

b6
b7C

[REDACTED] had [REDACTED]

[REDACTED] said that day was a low stage in her relationship because she could not believe [REDACTED]

[REDACTED] never [REDACTED]

31E-MM-108062

Continuation of FD-302 of [redacted] L. [redacted], On 03/17/2011, Page 7 of 12

[redacted] saw [redacted] [redacted] believed the girls may have been [redacted] but [redacted] was not certain of [redacted] involvement.

b6
b7C

[redacted] had a picture of herself she wanted to give [redacted]
[redacted]
[redacted]
[redacted]

b6
b7C

[redacted] described some of the unique interior areas of [redacted]
[redacted]
[redacted]

b6
b7C

[redacted] which [redacted] referred to [redacted]
[redacted]
[redacted] which was where [redacted] stayed.

While in New York, [redacted] also stayed at an apartment on 66th street [redacted] was aware of [redacted] additional apartments in the same building. According to [redacted] the apartment building on 66th street was owned by [redacted] GIUFFRE advised that she had a photograph of the interior of the 66th Street apartment among other photos [redacted]

b6
b7C

[redacted] advised that some of her photographs that were provided to her civil attorneys by her family were not returned. One of the missing photos depicted [redacted] wearing a pink dress while seated on a quad bike.

[redacted] LNU was [redacted] female that formerly lived in [redacted]
[redacted]

b6
b7C

31E-MM-108062

Continuation of FD-302 of [REDACTED], On 03/17/2011, Page 8 of 12

LNU and [REDACTED] went shopping together and purchased clothing and sex toys. [REDACTED] explained that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] used a cellular telephone [REDACTED]. She believed it was a New York City number but could not recall the number. [REDACTED] and [REDACTED]

[REDACTED]

[REDACTED] could only remember faces [REDACTED] not their names. [REDACTED] did not [REDACTED] but she did try unsuccessfully to get [REDACTED]

[REDACTED]

[REDACTED] recalled [REDACTED]

[REDACTED] but she could not recall the wording. [REDACTED] LNU.

[REDACTED] advised [REDACTED]

[REDACTED]

[REDACTED] traveled [REDACTED] to a self-help conference at a hotel in New Orleans, Louisiana. The hotel was near the Hard Rock Café in New Orleans. [REDACTED] traveled the world [REDACTED] including the USVI, New York, Santa Fe, Palm Beach, France, Africa, Spain and the United Kingdom.

[REDACTED]

[REDACTED] recalled visiting Alhambra Castle in Spain. [REDACTED]

[REDACTED] GIUFFRE eventually traveled to the United Kingdom and

b6
b7C

b6
b7C

b6
b7C

b6
b7C

b6
b7C

31E-MM-108062

Continuation of FD-302 of [redacted], On 03/17/2011, Page 9 of 12

while there [redacted] approached [redacted] in a very excited manner and told her they had to go shopping to pick out a dress because [redacted] would be dancing with [redacted]

b6
b7C

[redacted] and [redacted] went shopping and purchased makeup, clothing, and a Burberry bag. The items were purchased with [redacted] and [redacted] returned [redacted] instructed [redacted] to get ready. When [redacted] came down after getting ready, she was introduced to [redacted]

b6
b7C

[redacted]

[redacted] traveled to CLUB TRAMP [redacted] danced [redacted] at CLUB TRAMP [redacted]

[redacted]

[redacted] stayed at CLUB TRAMP for an hour or hour and a half and drank a couple of cocktails before returning to [redacted] [redacted] had not received any direction from [redacted]

[redacted] After returning to [redacted] requested [redacted] to take a photograph of her [redacted] advised that she still had the original photograph in her possession and would provide it to the interviewing agents. [redacted] proceeded with [redacted]

[redacted]

Approximately two months later, [redacted] met [redacted] at [redacted]

b6
b7C

[redacted]

[redacted] recalled [redacted] LNU, [redacted]

[redacted]

[redacted] GIUFFRE recalled [redacted] joking about trading GIUFFRE in because she was getting too old.

31E-MM-108062

Continuation of FD-302 of [redacted], On 03/17/2011, Page 10 of 12

[redacted] recalled meeting [redacted] [redacted] was using Xanax heavily at the time, and her recollection was not clear. She remembered there were many models on the island that did not speak English along with a modeling person who had an unknown accent.

b6
b7C

[redacted]

b6
b7C

[redacted] did not have a problem with [redacted] using prescription drugs. [redacted] was described by [redacted] as a

b6
b7C

[redacted] (TRUE NAME UNKNOWN) [redacted] a ranch employee in [redacted] but [redacted] could not recall his name. She did have a photograph of the ranch employee.

b6
b7C

[redacted] met numerous famous people [redacted] including academics, politicians, and celebrities. She met [redacted] and [redacted] and [redacted]

b6
b7C

[redacted] received many gifts [redacted] including jewelry, watches, bags, shoes, make up, clothing, and home furnishings. [redacted]

b6
b7C

[redacted] left all of the items behind when she traveled to Thailand to receive massage training.

In August 2002, [redacted] traveled by commercial airline to Bangkok, Thailand and began her massage training at International Training Massage School (ITM) where she received her massage certification. She stayed at the Princess Hotel in Thailand [redacted] but never did. [redacted] met her future husband, [redacted] during her visit to Thailand. [redacted] contacted [redacted] telephonically and told him she had fallen in love with someone. [redacted]

b6
b7C

31E-MM-108062

Continuation of FD-302 of [redacted], On 03/17/2011, Page 11 of 12

[redacted] had not heard from [redacted]. [redacted] received a telephone call from [redacted]. During that call, [redacted] stated he was an FBI agent. He was trying to determine what she knew about [redacted]. She did not tell [redacted] anything about her knowledge of [redacted]. She also received another telephone call from a person that indicated he was an FBI agent. She did not tell that individual anything either. She also received a call from an attorney that was trying to determine if she had spoken with anyone or was willing to speak to anyone [redacted]. She explained that she was receiving telephone calls from people whom she did not know and that she was uncomfortable telling them anything over the telephone.

b6
b7C

One or two weeks later, an unknown attorney and [redacted] contacted [redacted] telephonically. [redacted]

b6
b7C

[redacted] was using a cellular telephone belonging to her husband. She nor her husband could recall the telephone number but advised that the carrier was OPTUS telephone company.

[redacted] reviewed a series of photographs of individuals and identified the following:

- Page 1, number 1, [redacted]
- Page 1, number 2, [redacted] LNU, a.k.a. [redacted]
- Page 2, number 1, [redacted]
- Page 2, number 6, [redacted]
- Page 3, number 2, [redacted]
- Page 4, number 3, [redacted] LNU
- Page 4, number 7, [redacted]
- Page 4, number 8, [redacted]
- Page 5, number 1, [redacted]

b6
b7C

[redacted] advised that the following were familiar to her, but she could not recall their names or her association to them:

31E-MM-108062

Continuation of FD-302 of [REDACTED], On 03/17/2011, Page 12 of 12

Page 1, number 4

Page 2, numbers 7 and 8

Page 3, number 8

Page 4, number 1

Page 5, numbers 5 and 8

The images reviewed by [REDACTED] were placed in a 1A envelope of the case file.

When questioned about United States Customs and Border (CBP) Patrol records of her entries into the United States, [REDACTED] advised that her January 2001 record was the return from her London, England trip [REDACTED]

[REDACTED] The April 2001 CBP record was her return to the United States [REDACTED]

[REDACTED] [REDACTED] could not recall her travel from March and May 2001 CPB records. [REDACTED] advised that her United States Passport was turned over to the United States Consulate in Sydney, Australia.

b6
b7C

On March 18, 2011, writer, SA [REDACTED] and [REDACTED] traveled to [REDACTED] residence where she provided 20 photographs and her ITM massage school certification. FD-597 Receipts for Property were executed for the items and a copy was provided to [REDACTED]. It is noted that the receipts were dated based on the United States Eastern Standard Time Zone date. The photographs, certification and original FD-597s were placed in a 1A envelopes of case file.

b6
b7C