

PLAINTIFF'S UNVERIFIED BETTER ANSWERS TO
DEFENDANT'S FIRST 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?

██████████, with the assistance of my attorney, ██████████ Edwards.

Plaintiff objects to Defendant, Jeffrey Epstein, having her address, as Mr. Epstein is a registered sex offender and ██████████ was a victim of his, and disclosure of her address could compromise her safety and privacy.

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 - 2008.

July - September, 2008, I worked for ██████████
██████████

February - September, 2008, I worked for ██████████
██████████

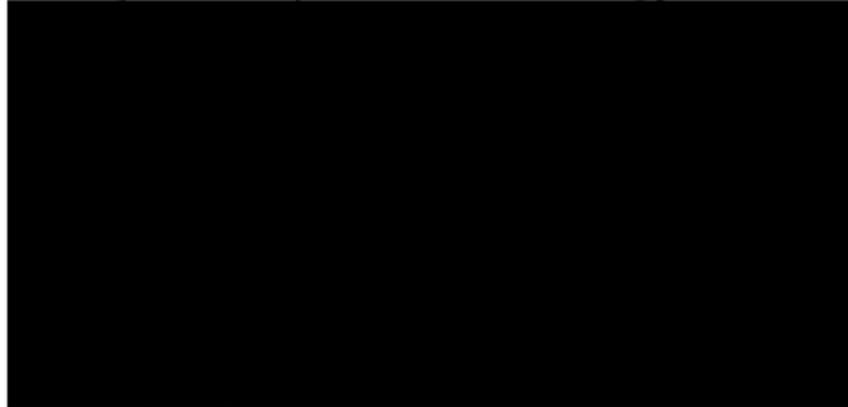
November 2007 to February 2008, I worked for ██████████
██████████

March 2007 - December 2007, I worked for ██████████
██████████

January 2007 - March 2007, I worked as a bartender at ██████████
██████████

2. (continued)

Approximately 2004 - 2006, I worked for the following places:

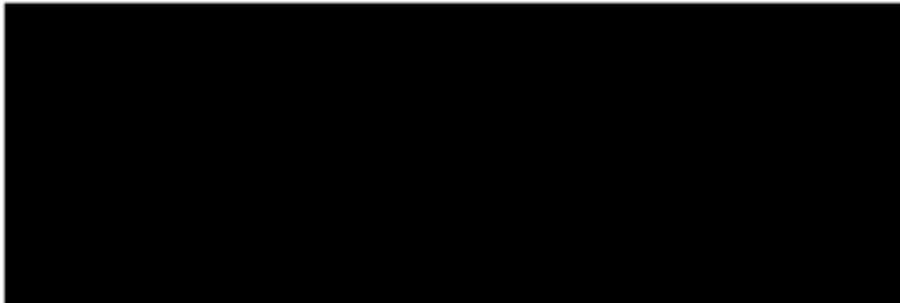


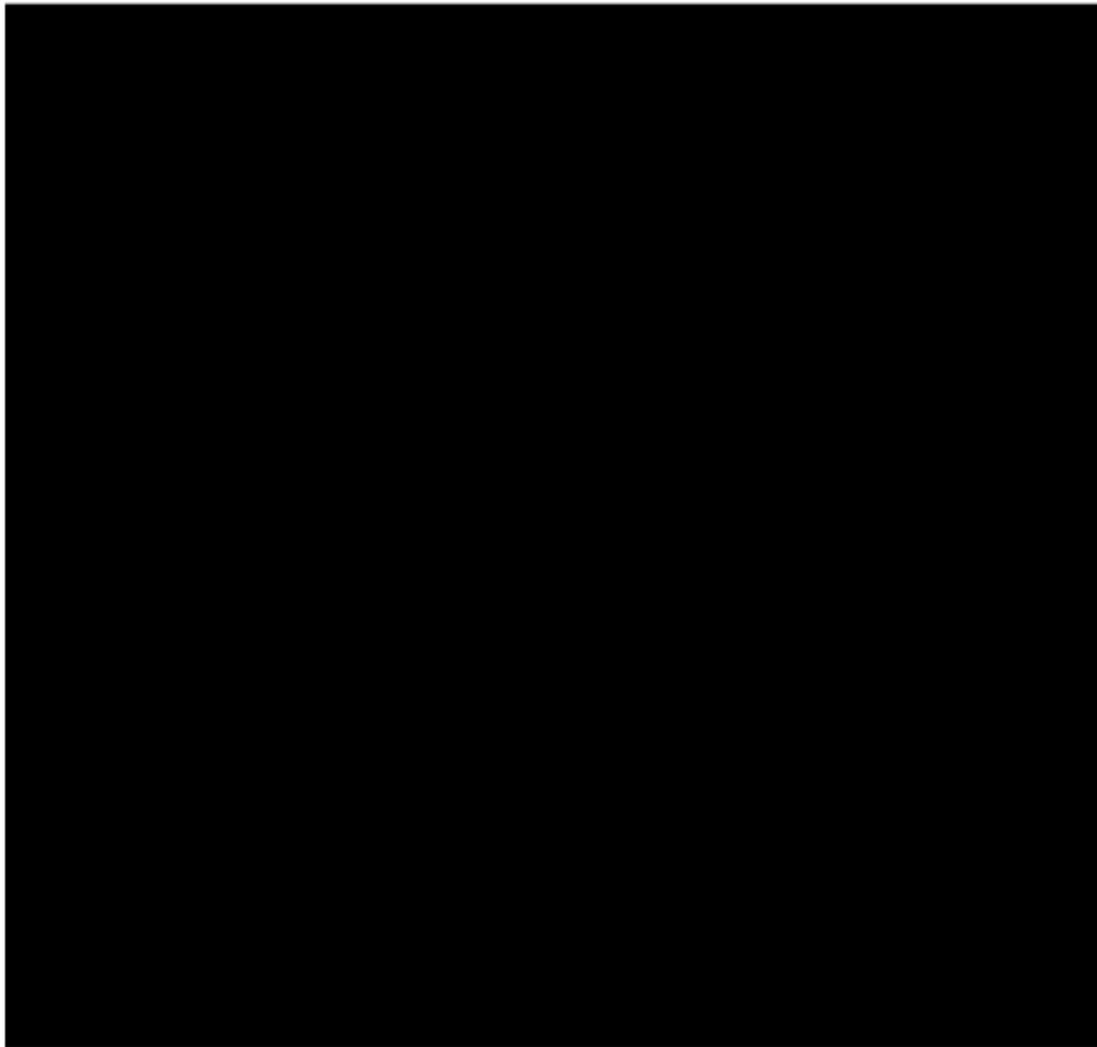
3. List all former names and when you were known by those names. State all addresses where you have lived for the past 10 years, the dates you lived at each address, your social security number, your date of birth, and if you are or have ever been married, the name of your spouse or spouses. List any 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.

No former names. Never married and no children. Social security number and date of birth have already been privately disclosed.

The answers provided below are to the best of Plaintiff's knowledge and memory, and are in descending chronological order from most recent back. Plaintiff is unsure as to the dates when lived at each address.

Current: Plaintiff objects to providing a current address as she strongly feels disclosure of such would compromise her safety; however, all other addresses are being produced.





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 the place of conviction.**

No.

5. List the names and addresses of all persons who are believed or known by you, your agents or attorneys to have any knowledge concerning any of the issues in this lawsuit; and specify the subject matter about which the witness has knowledge. Plaintiff is not yet aware of addresses; however, Plaintiff believes that Defendant has all addresses.

Plaintiff is not yet aware of addresses: however it is believed that Defendant has all the addresses.

██████████	Knowledge of finances and defendant's sexual desire for minor girls
Jean Luc Brunel	Knowledge of finances and defendant's sexual desire for minor girls
██████████ Wexner	Knowledge of finances and defendant's sexual desire for minor girls
Mark Epstein	Knowledge of finances and defendant's sexual desire for minor girls
Donald Trump	Knowledge of finances and defendant's sexual desire for minor girls
Jennie Saunders	Arranges for underage girls to go to and from Jeff's island
David Copperfield	Knowledge of finances and defendant's sexual desire for minor girls
Ghislaine Maxwell	Knowledge of finances and defendant's sexual desire for minor girls
██████████	Knowledge of finances and defendant's sexual desire for minor girls
██████████ Cunningham	Knowledge of finances and defendant's sexual desire for minor girls
Harry Beller	Knowledge of finances and defendant's sexual desire for minor girls
Tony Malotta	Knowledge of finances and defendant's sexual desire for minor girls
Egor Zanolie	Knowledge of finances and defendant's sexual desire for minor girls
██████████ Tagliana	Knowledge of finances and defendant's sexual desire for minor girls
██████████ in NY	Knowledge of finances and defendant's sexual desire for minor girls
Lawrence Krauss	Knowledge of finances and defendant's sexual desire for minor girls
Mortimer Zuckerman	Knowledge of finances and defendant's

	sexual desire for minor girls
[REDACTED]	Knowledge of finances and defendant's sexual desire for minor girls
Mike and [REDACTED]	Knowledge of finances and defendant's sexual desire for minor girls
[REDACTED]	Knowledge of finances and defendant's sexual desire for minor girls
Vadwon Cotrin	Knowledge of finances and defendant's sexual desire for minor girls
[REDACTED] & [REDACTED]	Knowledge of finances and defendant's sexual desire for minor girls
[REDACTED]	Knowledge of finances and defendant's sexual desire for minor girls
Jeffrey Epstein's mother and father	Knowledge of finances and defendant's sexual desire for minor girls
Lebet [REDACTED]	Knowledge of finances and defendant's sexual desire for minor girls
[REDACTED]	Knowledge of finances and defendant's sexual desire for minor girls
[REDACTED]	Knowledge of finances and defendant's sexual desire for minor girls
[REDACTED]	Knowledge of finances and defendant's sexual desire for minor girls
Janvz Banasiak	Epstein's house manager during time our client's went to him
Michael Reiter	Knowledge of defendant's sexual desire for minor girls
Det. Recarey	Knowledge of defendant's sexual desire for minor girls
[REDACTED]	Knowledge of finances and defendant's sexual desire for minor girls
Bob and Todd Meister	Knowledge of finances and defendant's sexual desire for minor girls
Cecelia Stein	Knowledge of finances and defendant's sexual desire for minor girls
Larry Visoski	Knowledge of finances and defendant's sexual desire for minor girls
Ronald Baron	Knowledge of finances and defendant's sexual desire for minor girls
Glenn [REDACTED]	Knowledge of finances and defendant's sexual desire for minor girls
Amy Fortimer	Knowledge of finances and defendant's sexual desire for minor girls
Abigail Wexner	Knowledge of finances and defendant's sexual desire for minor girls
Jeffrey Goldsmith	Knowledge of finances and defendant's sexual desire for minor girls

Sandy Berger	Knowledge of finances and defendant's sexual desire for minor girls
Ofc. Munyan	Knowledge of defendant's sexual desire for minor girls
Ofc. Minot	Knowledge of defendant's sexual desire for minor girls
Sgt. Sorge	Knowledge of defendant's sexual desire for minor girls
██████	Knowledge of finances and defendant's sexual desire for minor girls
Pilot David Rogers	Knowledge of finances and defendant's sexual desire for minor girls
██████	Knowledge of finances and defendant's sexual desire for minor girls
Alfredo Rodriquez	Knowledge of finances and defendant's sexual desire for minor girls
Leon Black	Knowledge of finances and defendant's sexual desire for minor girls
Jeff Fuller	Knowledge of finances and defendant's sexual desire for minor girls
Ron Burkle	Knowledge of finances and defendant's sexual desire for minor girls
All people that visited Defendant in jail	Knowledge of finances and defendant's sexual desire for minor girls, and statements made by defendant

All minor females with whom Defendant has engaged in sexual activities (including, but not limited to, those provided in addendum to NPA, all Plaintiff's with sex abuse claims against Defendant, those listed in police reports and documents by Palm Beach Police)	Knowledge of finances and defendant's sexual desire for minor girls
Juan Alessi	Knowledge of finances and defendant's sexual desire for minor girls
Maria Alessi	Knowledge of finances and defendant's sexual desire for minor girls
Jim Baca	Knowledge of finances and defendant's sexual desire for minor girls
Janusz Banasiak	Knowledge of finances and defendant's

	sexual desire for minor girls
Keith Blumberg	Knowledge of finances and defendant's sexual desire for minor girls
██████ (last name unknown at this time)	Knowledge of finances and defendant's sexual desire for minor girls
██████ Campos	Knowledge of finances and defendant's sexual desire for minor girls
Jimmy Cayne	Knowledge of finances and defendant's sexual desire for minor girls
Cecelia (last name unknown at this time)	Knowledge of finances and defendant's sexual desire for minor girls
Maximilia Cordero	Knowledge of finances and defendant's sexual desire for minor girls
Ellen Cunningham	Knowledge of finances and defendant's sexual desire for minor girls
Dave (last name unknown at this time)	Knowledge of finances and defendant's sexual desire for minor girls
Ryan Dionne	Knowledge of finances and defendant's sexual desire for minor girls
██████	Knowledge of finances and defendant's sexual desire for minor girls
Michael ██████	Knowledge of finances and defendant's sexual desire for minor girls
██████	Knowledge of finances and defendant's sexual desire for minor girls
Eric Gany	Knowledge of finances and defendant's sexual desire for minor girls
██████ Hessey	Knowledge of finances and defendant's sexual desire for minor girls
██████ (last name unknown at this time)	Knowledge of finances and defendant's sexual desire for minor girls
Karen (last name unknown at this time)	Knowledge of finances and defendant's sexual desire for minor girls
██████	Knowledge of finances and defendant's sexual desire for minor girls
Gary King	Knowledge of finances and defendant's sexual desire for minor girls
Bella Klein	Knowledge of finances and defendant's sexual desire for minor girls
Adam Perry Lang	Knowledge of finances and defendant's sexual desire for minor girls
Michael Liffman	Knowledge of finances and defendant's

	sexual desire for minor girls
Mark Lumberg	Knowledge of finances and defendant's sexual desire for minor girls
██████████	Knowledge of finances and defendant's sexual desire for minor girls
Lynn (last name unknown at this time)	Knowledge of finances and defendant's sexual desire for minor girls
Brahakmana ██████████	Knowledge of finances and defendant's sexual desire for minor girls
██████████ ██████████	Knowledge of finances and defendant's sexual desire for minor girls
David Mullen	Knowledge of finances and defendant's sexual desire for minor girls
Gary Nikolitis	Knowledge of finances and defendant's sexual desire for minor girls
David Norr	Knowledge of finances and defendant's sexual desire for minor girls
Bill Peadon	Knowledge of finances and defendant's sexual desire for minor girls
Francis Peadon	Knowledge of finances and defendant's sexual desire for minor girls
Jerome Pierre	Knowledge of finances and defendant's sexual desire for minor girls
██████████ ██████████	Knowledge of finances and defendant's sexual desire for minor girls
Governor Bill Richardson	Knowledge of finances and defendant's sexual desire for minor girls
██████████ ██████████	Knowledge of finances and defendant's sexual desire for minor girls
Alfredo Rodriguez	Knowledge of finances and defendant's sexual desire for minor girls
David Rogers	Knowledge of finances and defendant's sexual desire for minor girls
██████████ ██████████	Knowledge of finances and defendant's sexual desire for minor girls
Howard Rubenstein	Knowledge of finances and defendant's sexual desire for minor girls
Florencia Rueda	Knowledge of finances and defendant's sexual desire for minor girls
Joseph Rueda	Knowledge of finances and defendant's sexual desire for minor girls
██████████ ██████████	Knowledge of finances and defendant's sexual desire for minor girls
Santa Fe County Sheriff	Knowledge of finances and defendant's

Solano	sexual desire for minor girls
Alan Stopeck	Knowledge of finances and defendant's sexual desire for minor girls
Mark Tafoya	Knowledge of finances and defendant's sexual desire for minor girls
Brent Tindall	Knowledge of finances and defendant's sexual desire for minor girls
Jojo (last name unknown at this time)	Knowledge of finances and defendant's sexual desire for minor girls
All girls identified in the attachment to the non-prosecution agreement that Defendant, Jeffrey Epstein, has entered with the United States and all other similarly-situated girls, whose identities Plaintiff will attempt to determine (and with regard to whom Defendant, Jeffrey Epstein, has invoked the Fifth Amendment rather than disclose their identities).	Knowledge of finances and defendant's sexual desire for minor girls
All other then-minor girls (those not listed in the attachment to the non-prosecution agreement), whose identities Plaintiff will attempt to determine, with whom Defendant, Jeffrey Epstein, has engaged in sexual activity. Knowledge of finances and defendant's sexual desire for minor girls	Knowledge of finances and defendant's sexual desire for minor girls
FBI agents, whose names, addresses and telephone numbers are unknown at this time, that investigated the criminal case(s) and the allegations made against Defendant, Jeffrey	Knowledge of finances and defendant's sexual desire for minor girls

<p>Epstein.</p> <p>State Prosecutors, whose names, addresses and telephone numbers are unknown at this time, including but not limited to:</p> <p>ASA Lanna [REDACTED] Belohlavek State Attorney's Office 15th Judicial Circuit ASA Weiss State Attorney's Office 15th Judicial Circuit</p>	<p>Knowledge of finances and defendant's sexual desire for minor girls</p>
<p>United States' Prosecutors, whose names, addresses and telephone numbers are unknown at this time, including but not limited to:</p> <p>[REDACTED]</p> <p>United States Attorney's Office 500 South Australian Avenue West Palm Beach, Florida 33401</p>	<p>Knowledge of finances and defendant's sexual desire for minor girls</p>
<p>All accountants, bookkeepers, bankers, financial institutions, representatives, real estate advisors, financial planners, employees, governmental persons or entities, and unknown others that may have discoverable information related to Defendant, Jeffrey Epstein's net worth and finances.</p>	

Any and all persons and/or entities identified through discovery having any knowledge of Defendant, Jeffrey Epstein's charitable, political or other donations made in the past.	
Any and all persons and/or entities identified through discovery that were sued in the past by Defendant, Jeffrey Epstein, and/or by any company or entity that the Defendant, Jeffrey Epstein, owned and/or managed.	
Reporters and other media persons, whose names, addresses and telephone numbers are unknown at this time.	
All other witnesses learned through discovery process.	

6. **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?**

When I first went to Defendant, Jeffrey Epstein's House, no. I began taking pain medication before going to his house each time and I developed an addiction to pain medication.

7. **Did you consume any alcoholic beverages or take any drugs or medication 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 and where you consumed them.**

Yes, I took various pain medications before going to Defendant, Jeffrey Epstein's house each time. I usually took 1 to 2 pills in the cab on the way to his house or with the 30 minutes before arriving.

8. 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.

My injuries are primarily emotional/psychological and are the direct result of Defendant, Jeffrey Epstein's actions. I was touched, battered, and fondled by Defendant, Jeffrey Epstein, during the incidents described in the complaint. I observed the Defendant touch and fondle himself. I observed the Defendant ejaculate numerous times.

I was made to touch the Defendant. I also observed sexual acts and had sexual acts perpetrated on me by Defendant, Jeffrey Epstein. At various times I was unclothed, as was the Defendant and others.

At all times material, I was a child, under the age of 18 years.

I was a victim of various criminal acts and sexual exploitation. I was inducted and coerced by the Defendant into acts of prostitution.

These injuries are further described in more detail in the factual allegations of the complaint.

9. 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.

I incurred medical and psychological expenses in the past and will incur such expenses in the future. I have suffered a loss of earning capacity due to Jeffrey Epstein's influence because I was encouraged by him as a minor child to enter a life of prostitution for him.

I suffered a loss of the capacity to enjoy life as a result of being coerced and induced into committing acts of prostitution and as a result of being sexually exploited. I lost self-worth, confidence and self esteem due to his control and influence.

I have suffered mental anguish, emotional distress, fear, humiliation and psychological trauma as a result of the acts described in the complaint.

The effect of these injuries is permanent in nature. These damages are further described in the complaint. The factual basis for these damages is described in the answer to #8 above, and in the factual allegations in the complaint.

10. Do you contend that you have lost any income, benefits, or earning capacity in the past or future as a result of the incident described in the complaint? If so, state the nature of the income, benefits, or earning capacity, and the amount and the method that you used in computing the amount.

I did not lose income, as I was an eighth grade student before meeting Defendant, Jeffrey Epstein. I did lose earning capacity, in that Defendant encouraged me into his deviant sexual world and influenced me away from a normal school life and into taking my clothes off and sexually pleasing him for money. As such, I do not have the education I would like to have and cannot obtain employment in a traditional profession.

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

██████████ M.S. LMHC (Licensed Therapist)
Palm Beach County Public Safety Department
Victim Services Division
205 North Dixie Highway
Suite 5.1100
West Palm Beach, FL 33401
561 355 2428

Office Palm Beach Doctors (Dr. Rishard) in West Palm Beach treated me for anxiety and depression, which are related to the abuse inflicted by Defendant, Jeffrey Epstein

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.

Dr. Rishard
Office Palm Beach Doctors
West Palm Beach, Florida

JFK Medical Center
5301 South Congress Avenue
Atlantis, Florida 33462

██████████ M.S. LMHC (Licensed Therapist)
Palm Beach County Public Safety Department
Victim Services Division
205 North Dixie Highway
Suite 5.1100
West Palm Beach, FL 33401
561 355 2428

Bethesda Memorial Hospital
2815 South Seacrest Boulevard
Boynton Beach, Florida 33435

CARP, Inc.
5400 East Avenue
West Palm Beach, Florida
(drug rehabilitation center)

St. Mary's Medical Center
901 - 45th Street
West Palm Beach, Florida 33407

A Fort Lauderdale hospital for mental health evaluation
(I cannot remember which hospital)

13. State the name and address of every person known to you, your agents, or 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 described 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.

None, other than those police officers or other investigators mentioned in criminal discovery previously disclosed to Defendant, Jeffrey Epstein.

14. Please state if you (or parents or guardians 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.

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.

I was a minor child at all times that I went to Defendant, Jeffrey Epstein's house and have not been since approximately September 2005; to the best of my knowledge and recollection. I went for the first time in July 2002, and I went there with [REDACTED] and [REDACTED]. Aside from Defendant, Jeffrey Epstein, there were usually other persons employed by Epstein at the house, and Defendant Epstein knows all the names and I did not keep any record. After the first time in July 2002 through the last time in September 2005, I went to Defendant, Jeffrey Epstein's house more than 100 times and Defendant, Jeffrey Epstein, would have a much more accurate count of my visits, and more documentation of the times I was there because he and [REDACTED] [REDACTED] kept a schedule. Because Defendant, Jeffrey Epstein, paid me to bring him other underage minor girls, I brought him more than 50 minor girls and I went to his house with them. I do not know all of their names, although Defendant, Jeffrey Epstein, does.

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.

The first time, [REDACTED] took [REDACTED] to Defendant, Jeffrey Epstein's house and I accompanied them, but I did not see him. Subsequently, [REDACTED] brought me to Jeffrey Epstein, and I was told that I would have to get undressed and give him a

massage. After that, I went to his house with various people and sometimes alone and usually in a cab.

17. **State the date you began engaging in prostitution, where (City and State), and whether you are still engaged in prostitution.**

The only prostitution I have ever engaged in was with Jeffrey Epstein.

18. **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.**

Defendant, Jeffrey Epstein, paid me \$200 for each time I went to his house and he sexually touched and/or fondled me. One time he gave me \$300 instead of \$200. Additionally, he paid me \$200 each time I brought another minor girl to his house and he sexually molested or abused them too. I went to his house more than 100 times.

19. **List separately the names, address and phone number 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.**

Objection, harassing; irrelevant, not reasonably calculated to lead to admissible evidence, violation of privacy interests and rights of Plaintiff and other innocent persons.

20. **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.**

Jeffrey Epstein was the only person.

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 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.**

Jeffrey Epstein was the only person.

22. 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.

Jeffrey Epstein was the only person.

23. List in detail all discussions/interviews which you had with any representative from FBI, U.S. Attorneys' Office, State Attorneys' Office (Palm Beach County), Palm Beach Sheriff's Office and Palm Beach Police Department regarding your meeting 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.

In 2007 and 2008 I spoke with the F.B.I. and/or the U.S. Attorney's Office or representatives from those agencies on several occasions (approximately 8-10 times total). I believe that one statement may have been taped. I told them about Defendant, Jeffrey Epstein, sexually abusing me and paying me. I also told them about the time that Defendant, Jeffrey Epstein, sent his investigators to my house to bang on my door and take pictures of my house and car. The primary F.B.I. agents that I spoke to were Nezbit and Jason.

24. State the names, addresses, ages and phone numbers of all females whom you claim were brought by you to Mr. Epstein's home to give him a massage. As to each female, state the amount of money you claim you were paid to bring each female.

I brought approximately 50 girls in total between July 2002 and September 2005. The ones I remember are [REDACTED]

- 25. 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.**

I was interviewed approximately 8-10 times by the F.B.I. and/or the U.S. Attorney's Office. I believe notes were taken most times and I told them about Defendant, Jeffrey Epstein, sexually touching and fondling me and paying me to bring him other minor girls.

- 26. 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.**

No such statements were ever made to me.

Plaintiff

I, counsel for _____, the Plaintiff herein, personally witnessed the Plaintiff execute this jurat page and do swear that _____ is personally known to me, is the individual identified in the foregoing answers and is the same individual whose identify has been previously disclosed, under seal, to the Defendant's counsel.

Edwards

STATE OF FLORIDA :
 :ss
COUNTY OF BROWARD :

SWORN TO AND SUBSCRIBED before me this ____ day of _____, 2009
by _____ EDWARDS, who is personally known to me.

Print Name

Signature

NOTARY PUBLIC - STATE OF FLORIDA
Commission Number:
My commission expires:
(Notarial Seal)