

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 JEFFREY EPSTEIN'S UPDATED
RESPONSES TO DEFENDANT/COUNTER-PLAINTIFF BRADLEY
EDWARDS'S NET WORTH INTERROGATORIES TO JEFFREY EPSTEIN**

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 amended responses to Defendant/Counter-Plaintiff Bradley Edward's Net Worth Interrogatories to Jeffrey Epstein:

1. What is your full name?

ANSWER: Jeffrey Edward Epstein

2. How are you currently employed?

ANSWER: Self-employed and Philanthropist.

3. State the amount of your current salary from and describe all additional benefits of employment including bonuses, allowances, pension and profit sharing participations, stock options, deferred compensation, insurance benefits and other prerequisites of your employment including dollar amount or dollar value of each during the twelve months preceding your receipt of these interrogatories.

Answer: Objection. This Interrogatory requires the provision of detailed financial information 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. If you own or have any beneficial interest in any stocks, bonds, mutual funds, or other securities of any class in any government, governmental organization, company, firm or corporation, whether foreign or domestic, please state:

- a. The name and address of the entity in which you own or have any beneficial property or security interest of any sort;
- b. The serial number of each bond, share, stock certificate, or other evidence of ownership or security;
- c. The current fair market value of each such interest;
- d. The manner in which such value was calculated.

Answer: Objection. This Interrogatory requires the provision of detailed financial information 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. As to each income tax return filed by you or on your behalf with any taxing authority for the years 2011 through 2016, identify as specifically as identified in your tax return the source of all reported income and the separate amounts derived from each source.

Answer: Objection. This Interrogatory requires the provision of detailed financial

information 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. For each parcel of real property in which you hold any interest: state:
 - a. The address;
 - b. The legal description of the property;
 - c. The assessed value of the property for tax purposes;
 - d. The date and price of acquisition;
 - e. Whether, when, by whom, why and at what amount the property has been appraised since the time of purchase;
 - f. Whether, when and at what price the property has been offered for sale since the time of purchase;
 - g. The name and address of each real estate agent with whom the property has been listed for sale since the time of purchase;
 - h. The cost of any improvements made to the property since purchase;
 - i. The nature of your interest in the property;
 - j. The current fair market value of the property and a description of the manner in which that value was calculated.

Answer: Objection. This Interrogatory requires the provision of detailed financial information 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. List each item and state the estimated value of all personal tangible, and intangible property in which you have an interest which personal property was acquired

at a cost in excess of \$5,000 or which personal property has an estimated present value in excess of \$5,000, and as to each state:

- a. The date of acquisition;
- b. The cost of acquisition;
- c. The current estimated fair market value;
- d. The manner in which the fair market value was estimated.

Answer: Objection. This Interrogatory requires the provision of detailed financial information 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. If any of the real or personal property owned by you, either individually, jointly or otherwise, is encumbered by a real estate mortgage, chattel mortgage, or any other type of lien, then for each item of property, state a description of the nature and amount of the encumbrance, the date the encumbrance arose, whether the encumbrance is evidenced by any written document and, if so, a description of that document.

Answer: Objection. This Interrogatory requires the provision of detailed financial information 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. If you have an ownership interest in any businesses, for each business state:
- a. The name and address of the business;
 - b. The present book value and the present market value of your interest in the business, and its percentage of the total value of the business;
 - c. A description of the manner in which the fair market value was calculated.

Answer: Objection. This Interrogatory requires the provision of detailed financial

information 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. Identify all banks, credit union and savings and loan accounts, in which you have an interest or right of withdrawal and for each account state:

- a. Where the account is located;
- b. The highest and lowest balance in the account during the 40 day period immediately preceding your receipt of these interrogatories.

Answer: Objection. This Interrogatory requires the provision of detailed financial information 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. Identify all other assets of a value in excess of \$5,000 which assets were not previously identified and as to each state:

- a. The date of acquisition;
- b. The cost of acquisition;
- c. The current estimated fair market value;
- d. The means utilized to estimate the current fair market value.

Answer: Objection. This Interrogatory requires the provision of detailed financial information 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. Identify all other liabilities not previously identified and as to each state:

- a. The date the liability arise;
- b. The amount of the liability at inception;
- c. The terms of repayment or satisfaction;
- d. The current outstanding balance.

Answer: Objection. This Interrogatory requires the provision of detailed financial information 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.

13. What is your present net worth?

Answer: I have already indicated my willingness to stipulate to a net worth in excess of one hundred million dollars.

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