

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 AMENDED RESPONSES TO  
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?

Jeffrey Edward Epstein

2. How are you currently employed?

Answer: Self-employed and Philanthropist.

3. State the amount of your current annual income from all sources for each of the past 3 years and describe all additional benefits received by you or payable to you for each of the past 3 years 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.

Answer: Objection. This Request for Production requires the identification of the existence of detailed financial information which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). “[T]he act of production itself” may implicitly communicate “statements of fact” that are testimonial in nature. *United States v. Hubbell*, 530 U.S. 27, 35-36 (2000). 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 future 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.

~~This Interrogatory is over broad, as it is well-settled law that only current financial documents are relevant to net worth determination for a punitive damages claim. *Lane v. Capital Acquisitions*, 242 F.R.D. 667 (S.D. Fla. 2005). Plaintiffs’ request for non-current financial information is irrelevant to a punitive damages determination, and a request as far back as five years is deemed over broad. *See Lane v. Capital Acquisitions*, 242 F.R.D. 667 (S.D. Fla. 2005) (“[t]he Court, however, does find that Plaintiffs’ discovery requests are overbroad on their face in that some seek financial records for a five-year period.”).~~

~~To the extent that this Interrogatory requests information that is covered by the Accountant/Client and or the Attorney/Client privilege, I assert said privileges as provided for in §§90.502 and 90.5055 of the *Florida Statutes*.~~

~~Finally, this information is a trade secret and protected from disclosure under The Florida Uniform Trade Secrets Act, §688.01 *et seq.* of the *Florida Statutes*; to wit: as a successful financier, I have developed “information, including a formula, pattern, compilation, program, device, method, technique, or process that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.” §688.002(4) *FLA. STAT.* (2012).~~

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 date and cost of acquisition;
- c. The current fair market value of each such interest;
- d. The manner in which such value was calculated.

Answer: Objection. This Request for Production requires the identification of the existence of detailed financial information which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). “[T]he act of production itself” may implicitly communicate “statements of fact” that are testimonial in nature. *United States v. Hubbell*, 530 U.S. 27, 35-36 (2000). 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 future 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.

~~This information is a trade secret and protected from disclosure under The Florida Uniform Trade Secrets Act, §688.01 et seq. of the Florida Statutes; to wit: as a financier, I have developed “information, including a formula, pattern, compilation, program, device, method, technique, or process that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.” §688.002(4) FLA. STAT. (2012).~~

~~Furthermore, to the extent that this Interrogatory requires “the date and cost of acquisition” and “the current fair market value of each such interest,” this request lacks relevance and is not calculated to lead to the discovery of admissible evidence, as the acquisition cost of an asset and its corresponding current fair market value of each such interest are irrelevant to the extent that such costs are opportunity costs of holding the security, represent at best paper gains or losses, and are not an actual reflection of an increase or decrease in a party’s personal wealth. *See Lane v. Capital Acquisitions*, 242 F.R.D. 667 (S.D. Fla. 2005).~~

~~Additionally, to the extent that this Interrogatory requests “the manner in which the value was calculated,” I object as this is proprietary information and therefore subject to the Florida Uniform Trade Secrets Act as described above.~~

~~This calculation is deemed work product. To the extent that this Interrogatory requests information that is covered by the work product privilege, Accountant/Client and or the~~

~~Attorney/Client privilege, I assert said privileges, including those provided for in §§90.502 and 90.5055 of the Florida Statutes.~~

~~Finally, responding to this Interrogatory would necessarily encroach on the privacy rights of third parties under Art 1, § 12 of the Florida Constitution.~~

5. As to each income tax return filed by you or on your behalf with any taxing authority for the years 2009 through 2012, 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 Request for Production requires the identification of the existence of detailed financial information which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). “[T]he act of production itself” may implicitly communicate “statements of fact” that are testimonial in nature. *United States v. Hubbell*, 530 U.S. 27, 35-36 (2000). 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 future 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.

~~This Interrogatory is inartfully drafted and vague; this Interrogatory appears to be asking for a summary of the information contained within documents that are the subject of a Request to Produce. In accordance with Rule 1.340(e) of the Florida Rules of Civil Procedure, Edwards is directed to examine the tax returns for said response.~~

~~Additionally, any information requested that is the subject of accountant work sheets is protected by the work product privilege, Accountant/Client privilege and/or Attorney/Client privilege and as such I assert said privileges as provided for in §§90.502 and 90.5055 of the Florida Statutes.~~

~~To the extent that the sources of all reported income and the separate amounts derived from each source is proprietary information that falls within the definition of trade secret as defined by §688.002(4) of the Florida Statutes, I object to the production of such information, as this information is also protected by the Florida Uniform Trade Secrets Act.~~

~~Furthermore responding to this Interrogatory would necessarily infringe on the privacy rights of third parties, which are guaranteed and protected under Art 1, § 12 of the Florida 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 Request for Production requires the identification of the existence of detailed financial information which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). “[T]he act of production itself” may implicitly communicate “statements of fact” that are testimonial in nature. *United States v. Hubbell*, 530 U.S. 27, 35-36 (2000). 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 future 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.

~~This Interrogatory is repetitive of a Request to Produce and is once again a request for a summary of the requested production. Under Rule 1.340(c) of the Florida Rules of Civil Procedure, Edwards is directed to examine the corresponding Request for Production for the response to this Interrogatory.~~

~~This Interrogatory lacks relevance and is not calculated to lead to the discovery of admissible evidence; specifically subparts (d), (e), (f) and (j) request information that reflects opportunity costs and/or paper losses or gains which is irrelevant to the value of the asset at some time in the future. See *Lane v. Capital Acquisitions*, 242 F.R.D. 667 (S.D. Fla. 2005).~~

~~Under Rule 1.340(e) of the *Florida Rules of Civil Procedure*, Edwards is directed to the relevant production with respect to a response to subpart (h) since capital improvements to real estate are reflected in the taxable basis of the property.~~

~~Subparts (i) and (j) are proprietary information, classified as trade secrets and subject to the Florida Uniform Trade Secret Act, as explained above.~~

~~Subpart (g) is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence, as whether a property has been listed for sale and the name of the agent given the listing, is irrelevant to my current Financial Net Worth. See *Lane v. Capital Acquisitions*, 242 F.R.D. 667 (S.D. Fla. 2005).~~

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 \$10,000 or which personal property has an estimated present value in excess of \$10,000, 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 Request for Production requires the identification of the existence of detailed financial information which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). “[T]he act of production itself” may implicitly communicate “statements of fact” that are testimonial in nature. *United States v. Hubbell*, 530 U.S. 27, 35-36 (2000). 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 future 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.

~~This Interrogatory lacks relevance and is not reasonably calculated to lead to the discovery of admissible evidence, as the acquisition cost of an asset is irrelevant to its present value, as most assets depreciate over time such that the current value of the asset has no relevance to the value of the eroding asset at some point in the future.~~

~~Subpart (d) asks for information subject to work product privilege, Accountant/Client and/or Attorney/Client privilege, and as such I assert said privileges as provided for in §§90.502 and 90.5055 of the *Florida Statutes*.~~

~~Additionally, intangible assets are trade secrets and as such are subject to the Florida Uniform Trade Secret Act as defined above. Furthermore, intangible assets are the subject of several other Interrogatories and Requests for Production, and as such, this part of the Interrogatory is repetitive.~~

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 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 Request for Production requires the identification of the existence of detailed financial information which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). “[T]he act of production itself” may implicitly communicate “statements of fact” that are testimonial in nature. *United States v. Hubbell*, 530 U.S. 27, 35-36 (2000). 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 future 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.

~~This Interrogatory is inartfully drafted as to what is meant by “or otherwise,” and as such cannot be properly responded to as asked.~~

~~To the extent that this Interrogatory requests information regarding third parties, this information is protected by the third party’s right to financial and economic privacy, as guaranteed by Art 1, § 12 of the Florida 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 Request for Production requires the identification of the existence of detailed financial information which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). “[T]he act of production itself” may implicitly communicate “statements of fact” that are testimonial in nature. *United States v. Hubbell*, 530 U.S. 27, 35-36 (2000). 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 future

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.

~~This Interrogatory is inartfully drafted and vague such that I am unable to formulate a proper response to this Interrogatory.~~

~~To the extent that this Interrogatory requests information regarding third parties, that information is protected by the third party's right to financial and economic privacy as guaranteed by Art 1, § 12 of the Florida Constitution.~~

~~Additionally, this information is both the subject of and subject to confidentiality agreements and/or obligations such that disclosure of this information is prohibited. The requested information is proprietary information that falls within the definition of trade secret as defined by §688.002(4) of the Florida Statutes. This information is also protected by the Florida Uniform Trade Secrets Act.~~

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 365 day period immediately preceding your receipt of these interrogatories.

Answer: Objection. This Request for Production requires the identification of the existence of detailed financial information which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). “[T]he act of production itself” may implicitly communicate “statements of fact” that are testimonial in nature. *United States v. Hubbell*, 530 U.S. 27, 35-36 (2000). 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 future 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.

~~Additionally, this Interrogatory is overbroad, vague and inartfully drafted, as it requests documents regarding “all bank accounts” in which Epstein has “a right to withdraw funds” without respect for third parties’ right to privacy as guaranteed under Art 1, § 12 of the Florida Constitution.~~

~~Furthermore, a party's right to withdraw funds from a bank account does not establish that the funds in each account for which I may withdraw funds are owned by me, or that~~

~~that I have a discretionary right to access and use those funds. As such, the funds cannot be properly considered in the financial net worth for punitive damages.~~

~~Finally, this Interrogatory is a request for a summary of Request for Production no. 9: Under Rule 1.340(c) of the Florida Rules of Civil Procedure, Edwards is directed to examine the responses to the Request for Production. Epstein reasserts each and every objection to the Request for Production no. 9 hereto.~~

11. Identify all other assets of a value in excess of \$10,000 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 Request for Production requires the identification of the existence of detailed financial information which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). “[T]he act of production itself” may implicitly communicate “statements of fact” that are testimonial in nature. *United States v. Hubbell*, 530 U.S. 27, 35-36 (2000). 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 future 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.

~~This Interrogatory has already been answered. See Interrogatory Number 7 above and response thereto; to wit: this Interrogatory lacks relevance and is not reasonably calculated to lead to the discovery of admissible evidence, as the acquisition cost of an asset is irrelevant to its present value, such that the current value of the asset has no relevance to the value of the eroding asset at some point in the future.~~

~~Subpart (d) asks for information that is subject to work product privilege, Accountant/Client and/or Attorney/Client privilege, and to the extent applicable, I assert said privilege as provided for in §§90.502 and 90.5055 of the Florida Statutes.~~

~~Additionally, intangible assets are trade secrets and as such are subject to the Florida Uniform Trade Secret Act as defined above. Furthermore, intangible assets are the subject of several other Interrogatories and Requests for Production, and as such, this part of the Interrogatory is repetitive.~~

12. Identify all other liabilities of an amount in excess of \$10,000 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 Request for Production requires the identification of the existence of detailed financial information which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). “[T]he act of production itself” may implicitly communicate “statements of fact” that are testimonial in nature. *United States v. Hubbell*, 530 U.S. 27, 35-36 (2000). 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 future 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.

~~There is neither a date nor time frame provided in this request, and to the extent that this Interrogatory asks for non-current information, it is overly burdensome, as it is well-settled law that only current financial information is relevant to a claim for punitive damages. *Lane v. Capital Acquisitions*, 242 F.R.D. 667 (S.D. Fla. 2005).~~

13. As to any calculation or estimate of your net worth at any time in the five years immediately preceding your receipt of these interrogatories, state:

- a. The date of the calculation or estimate;
- b. The name and address of the person or entity responsible for performing the work;
- c. The reason for performing the calculation or estimate;
- d. The amount of net worth calculated or estimated.

Answer: Objection. This Request for Production requires the identification of the existence of detailed financial information which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). “[T]he act of production itself” may implicitly communicate “statements of fact” that are testimonial in nature. *United States v. Hubbell*, 530 U.S. 27, 35-36 (2000). 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 future 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.

~~This Interrogatory is overly burdensome, as it is well-settled law that only current financial information is relevant to a claim for punitive damages. *Lane v. Capital Acquisitions*, 242 F.R.D. 667 (S.D. Fla. 2005). Plaintiff’s request for non-current financial information is irrelevant to a punitive damages determination, and a request as far back as five years is deemed overly burdensome. See *Lane v. Capital Acquisitions*, 242 F.R.D. 667 (S.D. Fla. 2005) (“[t]he Court, however, does find that Plaintiffs’ discovery requests are overbroad on their face in that some seek financial records for a five year period.”).~~

~~To the extent that this Interrogatory requests information that is covered by the Accountant/Client and or the Attorney/Client privilege, I assert said privileges as provided for in §90.502 and § 90.5055 of the *Florida Statutes*. This subject of this Interrogatory is also protected by work product privilege.~~

14. -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.

15. As to all transfers of anything of a value in excess of \$10,000 made by you or on your behalf within the past 5 years, state:

- a. A description of the transferred property;
- b. The reason for the transfer;
- c. The value of the item(s) transferred at the time of transfer;
- d. The date and cost of your acquisition of the item(s);
- e. Whether you received anything of value in exchange for the transferred item(s) and, if so, a description of what you received and the dollar value of what you received;
- f. The name and address of the recipient of each transferred item.

Answer: Objection. This Request for Production requires the identification of the existence of detailed financial information which communicates statements of fact. *Fisher v. United States*, 425 U.S. 391, 410 (1976). “[T]he act of production itself” may

implicitly communicate “statements of fact” that are testimonial in nature. *United States v. Hubbell*, 530 U.S. 27, 35-36 (2000). 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 future 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.

~~This Interrogatory is overly burdensome, as it is well-settled law that only current financial information is relevant to a claim for punitive damages. — *Lane v. Capital Acquisitions*, 242 F.R.D. 667 (S.D. Fla. 2005). Plaintiffs’ request for non-current financial information is irrelevant to a punitive damages determination, and a request as far back as five years is deemed overly burdensome. — *See Lane v. Capital Acquisitions*, 242 F.R.D. 667 (S.D. Fla. 2005) (“[t]he Court, however, does find that Plaintiffs’ discovery requests are overbroad on their face in that some seek financial records for a five year period.”).~~

~~To the extent that this Interrogatory requests information regarding third parties, that information is protected by the third party’s right to financial and economic privacy.~~

~~To the extent that this Interrogatory requests information that is covered by the Accountant/Client privilege, I assert said privilege as provided for in § 90.5055 of the *Florida Statutes*. This subject of this Interrogatory also may be protected by work product privilege.~~

**[THIS PORTION INTENTIONALLY LEFT BLANK]**

State of \_\_\_\_\_ )  
County of \_\_\_\_\_ )

Before me, the undersigned authority, this day personally appeared Jeffrey Epstein, who is personally known to me, and who first being duly sworn, says that all of the matters contained herein are true and correct.

\_\_\_\_\_  
NOTARY PUBLIC

| Sworn and Subscribed before me this ~~February 22~~July \_\_\_\_, 2013.