

## The Florida Bar Inquiry/Complaint Form

Your Name: <u>Jeffrey Epstein</u>	Attorney's Name: <u>Spencer Kuvin, Esq.</u>
Address: <u>250 Australian Ave S., Suite 1404</u>	Address: <span style="background-color: black; color: black;">[REDACTED]</span>
City: <u>West Palm Beach</u> State: <u>FL</u>	City: <u>Palm Beach Gardens</u> State: <u>FL</u>
Phone: <span style="background-color: black; color: black;">[REDACTED]</span> Zip Code: <u>33401</u>	Phone: <span style="background-color: black; color: black;">[REDACTED]</span> Zip Code: <u>33410</u>
ACAP Reference No. _____	

**PART TWO:** The specific thing or things I am complaining about are:

1. I am the Defendant in the case styled B.B. v. Epstein, Case No. 502008CA037319XXXMB AB in the Fifteenth Judicial Circuit in and for Palm Beach County, Florida. On September 2, 2009 I attended my deposition, which was taken by Spencer Kuvin, Esq.
  
2. Spencer Kuvin, counsel for Plaintiff, B.B., took my deposition, which began at approximately 10:00 a.m.
  
3. Directly after asking me my name, Mr. Kuvin asked, "[i]s it true, sir, that you have what's been described as an egg-shaped penis." See Deposition Transcript attached as **Exhibit "A."** Accordingly, Mr. Kuvin chose to immediately set the tone of the deposition in a sarcastic and demeaning manner in an effort to harass, embarrass, humiliate and intimidate me, thereby disregarding the entire deposition process. In an attempt to continue to embarrass, humiliate, harass and intimidate me, Mr. Kuvin continued with this line of questioning by referencing a document that Mr. Kuvin did not provide me or to my counsel and then asked the following: "[s]ir, according to the police department's probable cause affidavit, one witness described your penis as oval shaped and claim[ed], when erect, it was thick towards the bottom but was thin and small - - towards the head portion,

and called it egg-shaped . . . ." See Exhibit A. It was obvious from Mr. Kuvin's tenor that he did not intend to have a meaningful deposition. Instead, his goals were clear – (1) to embarrass, humiliate, intimidate and harass me; and (2) attempt to gain notoriety for himself and his firm.

4. Mr. Kuvin told one of my attorneys that he did not expect to make much money in this case, that he was a young lawyer and needed to market himself and get as much publicity as necessary for himself and his firm and that the case was another marketing method for himself and his firm. See Affidavit of Jack Goldberger, Esq. attached as **Exhibit B**. Nevertheless, Mr. Kuvin apparently subscribes to the old adage, "there is no such thing as bad publicity."

5. To further his goal of embarrassing and humiliating me and gaining a tactical media advantage before trial, as well as his goal to market himself and his firm, Mr. Kuvin provided the media and/or the Palm Beach Post with a copy of my video deposition, which was posted on the Palm Beach Post's website (<http://www.page2live.com/2009/09/17/perv-epstein-wont-talk-about-his-penis/>) and other sites on the internet, such as <http://www.youtube.com/watch?v=adCScCVZ9Rw&feature=related> and [http://www.huffingtonpost.com/2009/09/17/egg-shaped-penis-jeffrey\\_n\\_290464.html](http://www.huffingtonpost.com/2009/09/17/egg-shaped-penis-jeffrey_n_290464.html), as well as numerous other sites. As the bar will see from the titles and comments in response to the article and video provided to the media by Mr. Kuvin, my rights to a fair trial have been prejudiced here in Palm Beach County.

6. Moreover, on or about September 17, 2009, Mr. Kuvin, provided the media with an interview regarding a Non-Prosecution Agreement (the "NPA") I entered into with the United States Attorneys Office. Interestingly, Mr. Kuvin's client is not even listed on the

NPA. Yet, Mr. Kuvin felt compelled, once again, to harness the opportunity to speak to the media about me. Mr. Kuvin stated: "Epstein victimized at least 33 girls. He could've faced at least 33 life sentences had he been convicted under these charges." See Exhibit "C". "It's extremely unfair, extremely unfair to the 33 girls because it essentially brushes them aside as though nothing happened to them and it wasn't a big deal." Id. "There's no other person, no other person who would've gotten such a sweetheart deal had they not been as wealthy and as powerful as Jeffrey Epstein." Id. Mr. Kuvin has no basis to make such comments and his doing so is prejudicing my right to fair trial.

7. Mr. Kuvin has also made the following statements to the media:

- a. "But Spencer Kuvin, a lawyer for one of the victims, calls the decision [by the Fourth District Court of Appeals to not release the NPA] 'frustrating.' 'The rules shouldn't be different for rich people than they are for poor people,' Kuvin said. 'Had Epstein been a regular citizen, and not a billionaire, this document would have been made public a long time ago.'" See Palm Beach Post Daily News July 2, 2009 attached as Exhibit "D".
- b. With respect to a settlement of a claim brought by Kuvin's client, Kuvin told the Palm Beach Daily News, "She was not happy with the resolution, but she wanted it over. He's got investigators in the civil cases trying to dig up dirt on every one of his accusers. The disgusting thing is that he pleads the fifth on everything that's been asked of him and now he demands these girls' lives become an open book. ... He absolutely got special treatment because he's wealthy." See Palm Beach Daily News July 23-25, 2009 attached as Exhibit "E."

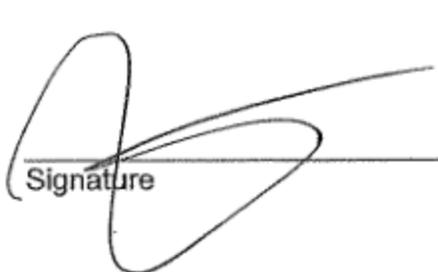
8. Moreover, some of the articles involving Jeffrey Epstein are directly "linked" to the Leopold-Kuvin website found at [www.leopoldkuvin.com](http://www.leopoldkuvin.com).

9. Mr. Kuvin's conduct is improper and violates Florida Rule of Professional Conduct 4-3.6 – Trial Publicity. Mr. Kuvin has obstructed my right to obtain a fair trial by virtue of his interviews and meeting with the media, which were done for the sole purpose of gaining media attention for Mr. Kuvin. In fact, Mr. Kuvin's actions may be in direct conflict with his client's directive and wish in connection with her requests to remain confidential and travel under the pseudonym, B.B., in this above referenced matter.

**PART THREE:** The witnesses in support of my allegations are:

1. Jack Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Ave South, Suite 1400, West Palm Beach, FL 33401.
2. Robert D. Critton, Jr. and Michael J. Pike of Burman, Critton, Luttier and Coleman, 303 Banyan Boulevard, West Palm Beach, Florida 33401. Suite 400.

**PART FOUR:** Under penalty of perjury, I declare the foregoing facts are true, correct and complete

 \_\_\_\_\_  
Signature

 \_\_\_\_\_  
Date

## The Florida Bar Inquiry/Complaint Form

Your Name: <u>Jeffrey Epstein</u>	Attorney's Name: <u>Bradley Edwards, Esq., William Berger, Esq. and Scott W. Rothstein</u>
Address: <u>250 Australian Ave S., Suite 1404</u>	Address: <u>Rothstein Rosenfeldt Adler, P.A., 401 East Las Olas Boulevard, Suite 1650</u>
City: <u>West Palm Beach</u> State: <u>FL</u>	City: <u>Fort Lauderdale</u> State: <u>FL</u>
Phone: <span style="background-color: black; color: black;">[REDACTED]</span> Zip Code: <u>33401</u>	Phone: <span style="background-color: black; color: black;">[REDACTED]</span> Zip Code: <u>33301</u>
ACAP Reference No. _____	

**PART TWO:** The specific thing or things I am complaining about are:

1. I am the Defendant in cases styled E.W. v. Epstein, Case No. 502008CA028051XXXXMB AB, L.M. v. Epstein, Case No. 502008CA028058XXXXMB AB in the Fifteenth Judicial Circuit in and for Palm Beach County, Florida and Jane Doe v. Epstein, Case No. 08-CIV-80893 Marra/Johnson, United States District Court, Southern District Court of Florida.

2. Mr. Edwards, Mr. Berger and Scott Rothstein, through their firm, Rothstein, Rosenfeldt and Adler, P.A., ("RRA") represented and currently represent the three Plaintiffs listed above, L.M., E.W. and Jane Doe; and, possibly other individuals.

3. Based upon the news media reports of Mr. Rothstein running a covert investment scheme built on legal settlements, it is my belief that the above-referenced lawyers obtained investors in the various cases against me by promising those investors a piece/share of the fees, settlements or verdicts reached in these cases.

4. Mr. Edwards has represented to my attorneys on multiple occasions that he believes these cases are worth tens of millions of dollars. Extensive discovery has taken place by Mr. Edwards with what appears an unlimited budget to litigate these cases.

5. I believe that the above lawyers and RRA improperly, unethically and potentially illegally solicited investors in these personal injury contingent cases to front money for payment of bills and costs with the understanding in writing or orally that the investors would receive a share of the attorneys fee or prospective settlement or judgment if and when any return was realized.

6. As of the current date, I have settled no cases with Mr. Edwards, Mr. Berger, Mr. Rothstein or RRA.

7. I believe various Florida Rules have been broken by the above-referenced attorneys with this investment scheme. I believe the following Bar Rules, but not limited to these Rules have been violated: Rule 4-1.2(d), 4-1.4; 4-1.5(a)(d)(f)(g); 4-1.8(a)(e)(f)(i); 4-8.3 and 4-8.4.

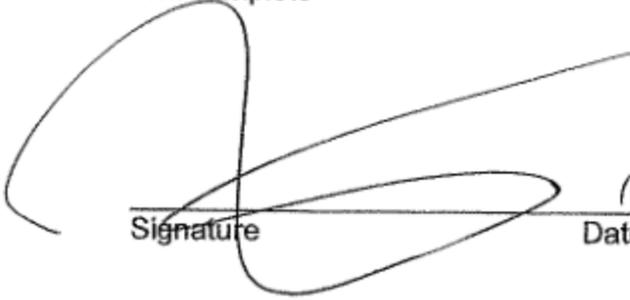
**PART THREE:** The witnesses in support of my allegations are:

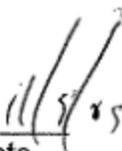
1. Bradley Edwards, Esq., William Berger, Esq., Scott Rothstein, Esq., Judge Herbert Stettin, the receiver, Stuart Rosenfeldt, Esq.; partners of Rothstein Rosenfeldt Adler, P.A., 401 East Las Olas Boulevard, Suite 1650, Fort Lauderdale, FL 33301; investors (unknown to me at this time).
2. My attorneys as to what has been said to them re: alleged value of the cases, Robert D. Critton, Jr., Esq. and Michael J. Pike, Esq. of Burman,

Critton, Luttier and Coleman, 303 Banyan Boulevard, Suite 400, West  
Palm Beach, Florida 33401

3. The Plaintiffs, L.M., E.W. and Jane Doe (S.R.).

**PART FOUR:** Under penalty of perjury, I declare the foregoing facts are true, correct and complete

 \_\_\_\_\_  
Signature

 \_\_\_\_\_  
Date