

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

JANE DOE NO. 2,

CASE NO: 08-CV-80119-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 3,

CASE NO: 08-CV-80232-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 4,

CASE NO: 08-CV-80380-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

CASE NO: 08-CV-80119-MARRA/JOHNSON

JANE DOE NO. 5,

CASE NO: 08-CV-80381-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 6.

CASE NO: 08-CV-80994-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 7,

CASE NO: 08-CV-80993-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

CASE NO: 08-CV-80119-MARRA/JOHNSON

CASE NO: 08-CV-80811-MARRA/JOHNSON

C.M.A.,

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE,

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

Plaintiff,

Vs.

JEFFREY EPSTEIN, et al.

Defendant.

DOE II,

CASE NO: 09-CV-80469-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN, et al.

Defendants.

CASE NO: 08-CV-80119-MARRA/JOHNSON

JANE DOE NO. 101,

CASE NO: 09-CV-80591-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 102,

CASE NO: 09-CV-80656-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

**PLAINTIFF, JANE DOE'S MOTION TO PROVIDE RECENTLY-OBTAINED
AFFIDAVIT OF JEFFREY E. EPSTEIN IN SUPPORT OF MATERIALS FACTS
SUPPORTING MOTON FOR APPOINTMENT OF A RECEIVER TO TAKE CHARGE
OF PROPERTY OF EPSTEIN**

Plaintiff, Jane Doe, hereby moves for leave to provide the recently-obtained Affidavit of Jeffrey E. Epstein in support of the Material Facts section of her Motion for Injunction Restraining Fraudulent Transfer of Assets (DE #165).

On June 19, 2009, Jane Doe filed a motion asking the Court to appoint a receiver to take charge of the assets of defendant Jeffrey Epstein to block further fraudulent transfers of his assets. The motion began with a statement of Material Fact, including

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facts regarding defendant Epstein's phenomenal wealth, ownership of a Caribbean Island, international contacts, and financial sophistication. The motion was supported by an affidavit of Jane Doe's counsel.

On July 13, 2009, defendant Epstein filed his response to the motion, arguing (among other things) that the affidavit supporting the material facts section was based on hearsay. While not contesting Jane Doe's Material Facts, Epstein argued that Jane Doe had failed to provide admissible evidence in support of those facts.

On or about that same day, June 13, 2009, counsel for Jane Doe received a copy of a sworn affidavit filed by Jeffrey E. Epstein in a civil case in the Southern District of New York. In his sworn affidavit, Epstein admits the following facts that are relevant to Jane Doe's pending motion:

- That he is President and Director of Financial Trust Company, Inc., a business that provides financial and business consulting services from the U.S. Virgin Islands to its clients.
- That he has been a legal resident of the U.S. Virgin Islands since 1999, residing at Little St. James Island – a 70-acre island that he owns through a wholly-owned limited liability company.
- From 1987 through the date of the affidavit, Epstein was one of Citibank's most important individual clients.
- In 1999, Epstein and Citibank did a \$10 million deal together, followed by another similar \$10 million deal the next year. These deals involved Epstein borrowing \$20 million from Citibank and then immediately reinvesting them in a fund that Citibank was touting.

Of course, as admissions by Epstein, none of these statements are hearsay and they are all admissible against Epstein. See Fed. R. Evid. 801. And, because they all come from a sworn affidavit contained in the official court files of the United States

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District Court for the Southern District of New York, the Court can take judicial notice of their authenticity. See Fed. R. Evid. 201.

Counsel for Jane Doe could not have provided this affidavit in support of its earlier motion, because it was not received until on or about July 13, 2009.

For all these reasons, the Court should grant Jane Doe leave to supplement the support for her material facts with this newly-obtained affidavit of Jeffrey Epstein.

DATED July 20, 2009

Respectfully Submitted,

s/ Bradley J. Edwards
Bradley J. Edwards
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 20, 2009, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically filed Notices of Electronic Filing.

s/ Bradley J. Edwards
Bradley J. Edwards

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SERVICE LIST
Jane Doe v. Jeffrey Epstein
United States District Court, Southern District of Florida

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