

<input checked="" type="checkbox"/> IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA. <input type="checkbox"/> IN THE COUNTY COURT IN AND FOR MIAMI-DADE COUNTY, FLORIDA.		
DIVISION <input checked="" type="checkbox"/> CIVIL <input type="checkbox"/> DISTRICTS <input type="checkbox"/> OTHER	<b>CIVIL ACTION SUMMONS</b> (b) Form for Personal Service on a Natural Person	CASE NUMBER 14021348CA0
PLAINTIFF(S)  JEAN-LUC BRUNEL	VS. DEFENDANT(S)  JEFFREY EPSTEIN,  TYLER MCDONALD,  TYLER MCDONALD D/B/A YI.ORG	CLOCK IN
THE STATE OF FLORIDA: TO EACH SHERIFF OF THE STATE, YOU ARE COMMANDED to serve this Summons and a copy of the Complaint in this lawsuit on defendant:		
To Defendant(s): JEFFREY EPSTEIN	Address: <i>Production office 423 Fern St #100 West Palm Beach, FL 33480-4730</i> 358 El Brillo Way Palm Beach, FL 33480-4730	
<b>IMPORTANT</b>		
<p>A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).</p> <p>If you choose to file a written response yourself, at the same time you file your written response with the Clerk of the Court, you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below. The central location of the Clerk's office is at the Dade County Courthouse. The address for the courthouse, and branch locations are listed below for your convenience:</p>		
<b>DADE COUNTY COURT LOCATIONS</b>		
<input checked="" type="checkbox"/> Dade County Courthouse (05) Room 133 73 West Flagler Street Miami, Florida 33130	<input type="checkbox"/> Joseph Caleb Center (20) Room 103 5400 NW 22 Avenue Miami, Florida 33142	<input type="checkbox"/> North Dade Justice Center (23) Room 100 15555 Biscayne Blvd. North Miami Beach, Florida 33160
<input type="checkbox"/> Miami Beach District Court (24) Room 200 1130 Washington Avenue Miami Beach, Florida 33139	<input type="checkbox"/> Coral Gables District Court (25) Room 100 3100 Ponce De Leon Blvd. Coral Gables, Florida 33134	<input type="checkbox"/> South Dade Justice Center (26) Room 1200 10710 SW 211 Street Miami, Florida 33189
<input type="checkbox"/> Hialeah District (21) Room 100 11 East 5th Street Hialeah, Florida 33010	<b>SERVICE</b>	
Plaintiff/Plaintiff Attorney JOE TITONE Florida Bar No. 203882	Address: 621 S.E. 5TH STREET, POMPANO BEACH, FL 33060	
HARVEY RUVIN CLERK OF COURTS	BY: <b>DEBRA SANCHEZ</b> DEPUTY CLERK	DATE ON: <b>FEB 09 2015</b>
<b>AMERICANS WITH DISABILITIES ACT OF 1990</b> <b>ADA NOTICE</b> "If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the Eleventh Judicial Circuit Court's ADA Coordinator, Lawson E. Thomas Courthouse Center, 175 NW 1 <sup>st</sup> Ave, Suite 2702, Miami, FL 33128, Telephone [REDACTED]; TDD [REDACTED], Fax [REDACTED] at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711."		

<input type="checkbox"/> EN LA CORTE DE CIRCUITO DEL UNDECIMO CIRCUITO JUDICIAL EN Y PARA EL CONDADO DE MIAMI-DADE, LA FLORIDA. <input type="checkbox"/> EN EL TRIBUNAL DEL CONDADO EN Y PARA EL CONDADO MIAMI-DADE, LA FLORIDA.		
<b>DIVISION</b> <input type="checkbox"/> CIVIL <input type="checkbox"/> OTRA	<b>EMPLAZAMIENTO DE ACCION CIVIL</b> <b>(b) NOTIFICACION PERSONAL A PERSONA NATURAL</b>	<b>NUMERO DE CASO</b>
<b>DEMANDANTE(S)</b>	<b>VS. DEMANDADO(S)</b>	<b>HORA</b>
<b>A Demandado(s):</b>	<b>Direccion:</b>	
<b>IMPORTANTE</b>		
<p>Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podria perder el caso podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal (Legal Aid Office) o un servicio de referencia de abogados (Attorney Referral Service) que aparecen en la guía telefonica.</p> <p>Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar en la mano una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante) y presentar su contestacion a la demanda al Secretario del Juzgado. La ubicacion central de la Oficina del Secretario esta en el edificio de la Corte del Condado de Dade. La direccion de la Corte, y de las sucursales aparecen en la lista siguiente para su conveniencia:</p>		
<b>LOCALIDAD DE LOS TRIBUNALES DEL CONDADO DE DADE</b>		
<input type="checkbox"/> Dade County Courthouse (05) Room 133 73 West Flagler Street Miami, Florida 33130	<input type="checkbox"/> Joseph Caleb Center (20) Room 103 5400 NW 22 Avenue Miami, Florida 33142	<input type="checkbox"/> North Dade Justice Center (23) Room 100 15555 Biscayne Blvd. North Miami Beach, Florida 33180
<input type="checkbox"/> Miami Beach District Court (24) Room 200 1130 Washington Avenue Miami Beach, Florida 33139	<input type="checkbox"/> Coral Gables District Court (25) Room 100 3100 Ponce De Leon Blvd. Coral Gables, Florida 33134	<input type="checkbox"/> South Dade Justice Center (26) Room 1200 10710 SW 211 Street Miami, Florida 33189
<b>Demandante o Abogado del Demandante</b>  <b>Numero del Colegio de Abogados:</b>	<b>Direccion:</b>	
<b>EL ESTADO DE LA FLORIDA:</b> A cada alguacil del Estado: Se le ordena que hagan entrega de esta notificacion y una copia de la demanda en este pleito al demandado(s) mencionada arriba.		
<b>HARVEY RUVIN</b> <b>Secretario del Tribunal del Condado</b>	<b>POR:</b> _____ Como Secretario Adjunto	<b>FECHA</b>
<b>Ley para Estadounidenses con Incapacidades</b>		
<p>"Si usted es una persona minusválida que necesita hacer arreglos para poder participar en este proceso, usted tiene derecho, sin gasto alguno, a que se le provea cierta ayuda. Por favor póngase en contacto con el Coordinador de ADA en el Onceavo Distrito Judicial ubicado en el Lawson E. Thomas Courthouse Center, 175 NW 1st Ave Sala 2702, Miami Fl 33128, Teléfonos [REDACTED]; TDD [REDACTED], Fax [REDACTED] por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales; o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711."</p>		

<input type="checkbox"/> AU TRIBUNAL DU ONZIEME ARRONDISSEMENT JUDICIAIRE DANS ET POUR MIAMI-DADE, FLORIDE. <input type="checkbox"/> AU TRIBUNAL DE JUGEMENT ET POUR LE DEPARTENT DE MIAMI-DADE, FLORIDE.		
<b>DIVISION</b> <input type="checkbox"/> CIVILE <input type="checkbox"/> AUTRE	<b>CONVOCARION D' ACTION CIVILE</b> <b>(b) LIVRAI ON PERSONNELLE A UNE PERSONNE</b>	<b>NUMERO DE CAS</b>
<b>PLAINT(E)(S)</b>	<b>VS. CONTRE ACCUSE(S)</b>	<b>HEURE IN</b>
<b>A (AUX) ACCUSE(S):</b>	<b>ADRESSE:</b>	
<b>IMPORTANT</b>		
<p>Des poursuites judiciaires ont ete entreprises contre vous. Vous avez 20 jours consecutifs a partir a de la date de l'assignation de cette citation pour déposer une réponse écrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous protéger. Vous etes obliges de déposer votre réponse écrite, avec mention du numero de dossier ci-dessus et du nom des parties nommees ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre réponse écrite dans le delai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).</p> <p>Si vous choisissez de déposer vous-meme une réponse écrite, il vous faudra egalement, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre réponse écrite au "Plaintif/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessus et enregistrer votre réponse avec le Greffier du Tribunal. L'adresse centrale du bureau du Greffier est la Dade County Courthouse. L'adresse du tribunal, et l'adresse des succursales sont dans ci-dessous pour votre convenance</p>		
<b>ADRESSES DES TRIBUNAUX EN DADE</b>		
<input type="checkbox"/> Dade County Courthouse (05) Room 133 73 West Flagler Street Miami, Florida 33130	<input type="checkbox"/> Joseph Caleb Center (20) Room 103 5400 NW 22 Avenue Miami, Florida 33142	<input type="checkbox"/> North Dade Justice Center (23) Room 100 15555 Biscayne Blvd. North Miami Beach, Florida 33160
<input type="checkbox"/> Miami Beach District Court (24) Room 200 1130 Washington Avenue Miami Beach, Florida 33139	<input type="checkbox"/> Coral Gables District Court (25) Room 100 3100 Ponce De Leon Blvd. Coral Gables, Florida 33134	<input type="checkbox"/> South Dade Justice Center (26) Room 1200 10710 SW 211 Street Miami, Florida 33189
<b>Plainte/Avocat du Plainte</b>	<b>Adresse:</b>	
<b>Numero de barreau de la Floride:</b>		
<b>L'AT DE LA FLORIDE:</b> A chaque sherif de l'etat vous etes oblige de presenter cette citation et une photocopie de la plainte de ce document sur l'accuse (e) ci-desus.		
<b>HARVEY RUVIN</b> Greffier de Tribunal	<b>PAR:</b> _____ COMME GREFFIER ADJOINT	<b>DATE ON:</b>
<b>ACT DE 1990 POUR AMERICAINS HANDICAPES</b> <b>AVIS DE L' ADA</b>		
<p>"Si vous êtes une personne handicapée qui a besoin d'accommodement pour pouvoir participer à cette procédure, vous avez le droit, sans aucun coût, d'avoir de l'aide à votre disposition. S'il vous plaît contacter le Coordinateur de l'ADA du Tribunal de l'Onzième Circuit Judiciaire, Lawson E. Thomas Courthouse Center, 175 NW 1<sup>st</sup> Ave Suite 2702, Miami, FL. 33128, Téléphone [REDACTED]; TDD [REDACTED], Fax [REDACTED] au moins 7 jours avant la date de comparution au tribunal, ou bien immédiatement après avoir reçu cet avis si la date avant la comparution est moins de 7 jours; si vous avez une incapacité pour entendre ou parler, appelez le 711."</p>		

<input type="checkbox"/> NAN TRIBUNAL ONZYEM AWONDISMAN JIDISYE NAN E POU MIAMI-DADE COUNTY, FLORIDA. <input type="checkbox"/> NAN TRIBUNAL E POU TRIBINAL NAN MIAMI-DADE COUNTY, FLORIDA.		
<b>DIVIZYON</b> <input type="checkbox"/> SIMIL <input type="checkbox"/> LOT	<b>KONVOKASYON POU KA SIMIL</b> <b>(b) DELIVRE PERSONELMAN BAY YON MOUN</b>	<b>NIMEWO KA</b>
<b>PLENTIF(S)</b>	<b>VS. KONT AKIZE(S)</b>	<b>LE</b>
<b>AKIZE:</b>	<b>ADRES:</b>	
<u>Enpotan</u>		
<p>Yo entre yon aksyon kont oumeum. Ou genyen 20 jou kalandriye apres ou recevoi somasyon-an pou enregistre devan greffe tribunal-sa, yon reponse pa ecri attache avec plent-la. Yon apel pa telefon ka kapab protege-ou. Se yon reponse pa ecri, fo ou mete numero ka-a ki sou tet pagela avec nom moun-ye ki sou papie-sa oblige ecri si ou vle ke tribunal-la tende position-ou cou ka-a. Si ou pa enregistre reponse-ou a l'heure ou capab pedu ka-a san tribunal la pa anounce-ou en yen, ou capab pedu l'agen ou ak byen ou. Genyen lot demande. Ou ka besoin telefons yon avoka tout de suit. Si ou pa lonen yon avoka, ou ka rele sevis ki rekomande avoka, ou biro ede legal (ki nan lis liv telefons).</p> <p>Si ou shoisi voye yon reponse pa ecri oumenm, ou supose en mem lan poste en mem lan poste on pote on copi response pa ecri pou avoka pleyan ou pleyan-ye ke non-li ama-a et enregistre reponse-la nan tribunal-la ki localize nan avek Sekrete Tribinal. Adres santral biwo Sekrete a se Dade County Courthouse. Adres tribinal la, ak adres tot tribinal yo nan lis ki anba a pou ou ka jwenn yo alez:</p>		
<b>ADRES TRIBINAL NAN DADE COUNTY</b>		
<input type="checkbox"/> Dade County Courthouse (05) Room 133 73 West Flagler Street Miami, Florida 33130	<input type="checkbox"/> Joseph Caleb Center (20) Room 103 5400 NW 22 Avenue Miami, Florida 33142	<input type="checkbox"/> North Dade Justice Center (23) Room 100 15555 Biscayne Blvd. North Miami Beach, Florida 33160
<input type="checkbox"/> Miami Beach District Court (24) Room 200 1130 Washington Avenue Miami Beach, Florida 33139	<input type="checkbox"/> Coral Gables District Court (25) Room 100 3100 Ponce De Leon Blvd Coral Gables, Florida 33134	<input type="checkbox"/> South Dade Justice Center (26) Room 1200 10710 SW 211 Street Miami, Florida 33189
Plainte/Avocat du Plainte Numero de barreau de la Floride:	Nimewo manm avoka a. Address:	
ETA FLORIDA: Pou Chak nan eta a yo odone ou pou bay akize a (yo), non l ekri anwo a, manda sa a ak yon kopi yo pote nan pwose sa a.		
<b>HARVEY RUVIN</b> Sekrete Jeneral Tribinal La	BAY: _____ SEKRETE	DATE: _____
<b>LWA 1990 POU AMERIKEN KI ENFIM</b> <b>ANONS POU AMERIKEN KI ENFIM</b>		
<p>"Si ou se yon moun ki enfim e ou bezwen akomodasyon pou ou patisipe nan pwosedi sa a, ou gen dwa pou yo ba ou kèk èd san ou pa gen pou ou peye. Silvouplè kontakte Kowòdinatè ADA pou Tribinal Onzyèm Distrik Jidisyè a nan: Lawson E. Thomas Courthouse Center, 175 NW 1<sup>st</sup> Ave., Suite 2702, Miami, FL 33128, Telefòn (██████████) ██████████; TDD ██████████, Fax ██████████ omwen 7 jou anvan ou gen randevou pou ou parèt nan tribinal la, oubyen imedyatman lè ou resevwa notifikasyon sa a si ou gen mwens ke 7 jou pou ou parèt nan tribinal la; si ou gen difikilte pou ou tande oubyen pale, rele 711."</p>		

IN THE ELEVENTH JUDICIAL CIRCUIT OF FLORIDA  
IN AND FOR DADE COUNTY, FLORIDA  
CIVIL DIVISION

JEAN-LUC BRUNEL, individually,  
and MC2 MODEL &  
TALENT MIAMI, LLC

Civil Action No.: 14-21348 CA 01

Plaintiffs,

vs.

JEFFREY EPSTEIN,  
TYLER MCDONALD, TYLER  
MCDONALD D/B/A/ YI.ORG

Defendants.

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**AMENDED VERIFIED COMPLAINT FOR LEGAL & EQUITABLE RELIEF AND  
DAMAGES**

COME NOW the Plaintiffs, Jean-Luc Brunel and MC2 Model & Talent Miami, LLC, by and through undersigned counsel, and sues Defendants Jeffrey Epstein, Tyler McDonald, and Tyler McDonald d/b/a/ Yi.Org for legal relief, equitable relief and defamation, and states as follows:

1. Venue is proper in Dade County, Florida as Defendants Tyler McDonald and Tyler McDonald d/b/a Yi.Org do business in Dade County, Plaintiff Jean-Luc Brunel resides in Dade County, Florida, and Plaintiff MC2 Model & Talent Miami, LLC, has an office in Dade County. The causes of action and damages against Defendant Jeffrey Epstein accrued in Dade County, Florida, due to specific acts by Epstein there, and accordingly, venue is appropriate there. Florida Statute 47.011.
2. Florida Statute 48.193(1)(a)(1) ("long-arm") authorizes service on both out-of-state Defendants (Tyler McDonald, and Tyler McDonald d/b/a/ Yi.Org).

3. Jurisdiction is proper in the Circuit Court as this action seeks relief in excess of fifteen-thousand dollars (\$15,000).

**FACTUAL ALLEGATIONS AS TO DEFENDANT JEFFREY EPSTEIN**

4. Plaintiff Jean-Luc Brunel is the owner of Plaintiff modeling agency known as “MC2 Model & Talent Miami” (“MC2”). MC2 began operations in October 2005 and has offices in New York, Miami, and Tel Aviv.

5. Defendant Jeffrey Epstein (“Epstein”) is a hedge-fund manager with a residence in Palm Beach County, Florida. Defendant has been the subject of significant media coverage due to charges brought against him involving sexual contact with minors. (Composite Exhibit A attached).

6. Plaintiff Brunel and Epstein have known one another since the inception of Plaintiff MC2.

7. Plaintiff Brunel operated his modeling agency, Plaintiff MC2, without incident until Epstein was first charged in Palm Beach County with unlawful sexual contact with a minor in 2006. He was convicted of soliciting prostitution from a minor and sentenced to eighteen months in prison, of which he served thirteen months. He remains a registered sex offender in Florida as of this day.

8. **First**, after the initial criminal charges against Epstein were filed in Palm Beach County, Plaintiffs were widely implicated in the media as being “linked” to Epstein. These false stories caused both Plaintiffs a tremendous loss of business.

9. Plaintiffs lost multiple contacts and business in the modeling business as a direct result of Epstein’s illegal actions. For example, several photographers will not work with MC2 due to the

adverse publicity surrounding Epstein and his illegal activities, and the publicity falsely linking Plaintiffs with those activities; namely, sex trafficking. (Composite Exhibit A).

10. One example of such a photographer was Michael Avedon, who worked with MC2 on photo shoots. Avedon stopped answering Plaintiffs' emails and phone calls after having known Plaintiff for some time. Upon meeting Avedon out one night, Avedon stated to Plaintiff Brunel he had "found out some information" from some friends of his and that he could not associate his name with MC2.

11. This statement by Avedon was no doubt a reference to the alleged and false links between Plaintiffs and Epstein's illegal activities with under-aged girls. This incident clearly illustrates an example of lost business on Plaintiffs' behalf.

12. The second example of a business relationship that was terminated due to Epstein's intentional and illegal activities was a very recent one, involving an overseas agency, Modilinos Model Agency. The owner stated that the model to be placed with MC2 "found some article in internet, which changed her position and she preferred to be placed with another agency." This was relayed to Plaintiff Brunel by e-mail dated October 15, 2014. This amply demonstrates that Epstein's intentional & illegal activities continue to cost Plaintiffs' business income. (Exhibit B attached).

13. A third example of a lost business relationship can be found in an e-mail dated October 17, 2014 (Exhibit C attached). The director of the I Mother Agency, Vladimir Yudashkin, states that a specific model will not sign with Plaintiff MC2 due to her fear that Plaintiffs' will force her into illegal activities. The model bases her fears upon the stories on the internet falsely implicating Plaintiffs as being involved with illegal activities with young models. This is

another example of a false link between Epstein and Plaintiffs, costing Plaintiffs' business income.

14. A fourth example of a lost business relationship can be found in a second e-mail dated October 17, 2014 (Exhibit D attached). Manuela Martinez of Mega Partners, a Brazilian modeling agency, states to Plaintiff Brunel that her agency has been unable to work with Plaintiff MC2 for the past five to six years because of the sex trafficking allegations against Plaintiffs. This reference is clearly to the false allegations online regarding sex trafficking that were based in the false link between Epstein and Plaintiffs.

15. A fifth example of a lost business relationship can be found in an e-mail dated on Plaintiff's behalf was an e-mail dated August 27, 2010 from [REDACTED] of Agence France Presse. (Exhibit E attached). Agence France Presse is a newswire service with a worldwide reach. Stockman wanted to meet with Plaintiff Brunel to arrange a model shoot with MC2. However, due to the adverse publicity surrounding Plaintiffs as a result of Epstein's illegal activities, Plaintiff Brunel was forced to forego (and lose) this business opportunity because he needed to keep a low-profile at this time.

16. A sixth example of lost business due to Epstein's intentional and illegal activities can be found in an e-mail dated December 12, 2014. (Exhibit F attached). Michael Sanka, a talent scout who had worked with Plaintiffs for a number of years, informed Plaintiff Brunel that he cannot sign any new models for Plaintiff Brunel's MC2 agency due to the false sex trafficking allegations online. Sanka goes on to state that Plaintiff Brunel's MC2 agency will not attract any new models if Plaintiff Brunel does not clear up the false allegations.

17. A seventh example of lost business due to Epstein's intentional and illegal activities can be found in an e-mail from Fox Fashion Agency (Exhibit G attached). This e-mail clearly states

that Fox has placed models with Plaintiff MC2 in the past with absolutely no problems. However, because of the false internet trafficking links between Plaintiffs and Epstein, Fox states that it cannot place anymore models with Plaintiff MC2 until the allegations are cleared up.

18. Before the false links between Plaintiff and Epstein surfaced, Plaintiff Brunel was earning a great deal of revenue from MC2 Miami.

19. The false links between Plaintiffs and Epstein began to surface online in about 2005-2006. Then, in 2006, Plaintiffs received a letter of credit from Epstein at 5% interest. Plaintiffs then made an investment totaling one-million dollars with Elite Paris, to start a company.

20. Next, Plaintiff Brunel started the company, "E Management", to work with Elite Models in Paris, Plaintiff had to close it almost immediately, because Elite didn't send any models to Plaintiff MC2 for fear of being linked to Epstein.

21. Because the false links between Plaintiffs and Epstein began to gain strength online, Elite Paris severed the agreement due entirely to these false links. Plaintiff Brunel lost his investment of one-million dollars because of this loss of business.

22. Plaintiffs lost potentially ten-million dollars in profits due to this initial one-million dollar loss.

23. Additionally, a former financial controller of MC2, [REDACTED], stated in a 2012 deposition that Plaintiff Brunel had never done anything inappropriate or illegal with any underage model. (Exhibits H1 & H2 -Transcript of Deposition of [REDACTED]).

24. [REDACTED] was fired from her job at Plaintiff MC2 for embezzling company funds, and had criminal charges filed against her (Composite Exhibit I attached). She was also the source of the false information linking Plaintiffs to sex trafficking in the articles written by [REDACTED] of the website Jezebel (Composite Exhibit A, p.2-7).

25. The deposition testimony of [REDACTED] referred to above clearly demonstrates that Plaintiff Brunel has clean hands and was never involved in sex trafficking. All of Plaintiffs' damages came solely from Epstein's conduct.

26. Additionally, Plaintiff Brunel has had significant delays in obtaining his visa to come to the U.S. These delays were also the result of the false link between Plaintiffs and Epstein. As a result of these delays, Plaintiffs lost a considerable amount of time & money. International travel is a significant component of Plaintiff Brunel's MC2 modeling business. Plaintiff Brunel has been forced to cancel his latest visa application as a result of the delays. (Exhibit J – Composite – Visa Docs).

27. As a result of the notoriety and tremendous publicity surrounding Epstein's criminal charges, and the media linkage of Epstein to Plaintiffs regarding illegal activities, Plaintiffs lost a tremendous amount of business and revenue.

28. Plaintiff Brunel's agency MC2 has lost millions of dollars in revenue since the media revealed that Plaintiffs and Epstein were associated. In fact, Plaintiff MC2 was worth millions of dollars; now, due to the illegal actions of Epstein, MC2 is almost worthless.

29. At no time did Epstein ever publicly state that Plaintiffs had no role whatsoever in the Epstein's illegal activities.

30. As a result of Epstein's illegal activities and his association with Plaintiffs, Plaintiffs continue to lose money and suffer damages to this day. (Exhibit K attached, Jeff Fuller email, 11-12-14).

31. Plaintiff Brunel will need to spend millions of dollars in order to restore his business to what it was once worth – money that the Plaintiff Brunel does not have.

32. Plaintiff Brunel continues to own and operate Plaintiff MC2 to this day, their names never having been cleared from the massive and totally negative media coverage involving Epstein and his illegal activities. Plaintiffs have been, and continue to be, irreparably harmed by these false internet-based links to Epstein. (Exhibits R & S attached).

33. **Second**, Plaintiff Brunel was also told by Epstein to leave the Palm Beach area in anticipation of a deposition of Plaintiff Brunel in a criminal case against Epstein. On the direct advice of Epstein, Plaintiff Brunel went to Europe and Asia for a period of time. This was done for the sole purpose of delaying Plaintiff Brunel's deposition.

34. As a direct result of Plaintiff Brunel's travels, his deposition was delayed twice. When it was finally scheduled for November 2009, Plaintiff Brunel was in fact available (Exhibit L attached). However, a medical emergency in the family of his attorney further delayed this deposition (Exhibit M attached). It was never rescheduled and he was never deposed.

35. This was a blatant example of obstruction of justice in the criminal case. Epstein was solely responsible for telling Plaintiff Brunel to leave the area. Plaintiff Brunel lost a huge opportunity to clear his name, and that of his agency, Plaintiff MC2.

36. **Third**, as a result of all of the facts stated above, Plaintiff Brunel was under tremendous psychological pressure throughout this period of time.

37. This psychological pressure resulted in Plaintiff Brunel avoiding business contacts as set forth above. This pressure also directly caused Plaintiff Brunel to avoid certain social contacts during this period of time.

38. Plaintiff Brunel became extremely withdrawn and anxious at this time.

39. Epstein's conduct was the direct cause of Plaintiff Brunel's psychological state. The press was reporting extensively on the lurid details of Epstein's illegal activities with the under-aged girls.

40. As stated above, the press reports were erroneously connecting both Plaintiffs to Epstein's illegal activities. (Composite Exhibit A attached).

41. Epstein's illegal activities were outrageous and extreme; they involved receiving massages from the under-aged girls while the girls were nude or nearly-nude; penetration of the girls with a finger or object; or full-intercourse.

42. These activities described above caused Plaintiff Brunel severe emotional distress. In fact, Plaintiff Brunel has recently undergone psychotherapy with a local psychologist, Dr. Royce N. Jalazo, as a result of Epstein's actions and the negative results on his business. (Exhibits N & O attached).

43. Plaintiff Brunel is emotionally destroyed as a result of Epstein's actions and the resultant effects on his business. He has been on medications to deal with the effects of this. (Composite Exhibit P – Medical History).

44. Plaintiffs have been damaged by the conduct of Defendant Epstein, and have accordingly retained undersigned counsel to represent him in this matter, and are obligated to pay counsel a reasonable fee for his services.

**FACTUAL ALLEGATIONS AS TO DEFENDANTS TYLER MCDONALD & TYLER  
MCDONALD D/B/A YI.ORG**

45. Defendant Tyler McDonald ("McDonald") is the owner/operator of Yi.Org and also does business as Yi.Org – Defendant Tyler McDonald d/b/a Yi.org ("McDonald d/b/a Yi.Org"). Defendant McDonald resides in the state of Washington. Yi.Org is a website hosting service based in Vancouver, British Columbia, Canada.

46. In about 2009, Yi.org, by and through the actions of its owner, McDonald, began hosting websites that contained hyperlinks that contained blatantly false and extremely disparaging information about Plaintiffs. (Exhibit Q attached - hyperlink screenshot).

47. These links clearly and falsely associated Plaintiffs with illicit escort services in the state of Florida; information which Defendants McDonald and McDonald d/b/a Yi.Org knew, or should have known, was false.

48. These links have damaged Plaintiff Brunel's reputation as an owner of a well-established modeling agency with offices in New York and Miami, Plaintiff MC2.

49. These links have also damaged the reputation of both Plaintiffs.

50. The combined damage to the reputation to both Plaintiffs has resulted in a significant loss of revenue to Plaintiff MC2, and accordingly, to Plaintiff Brunel.

51. Plaintiff MC2's revenues have fallen to a mere fraction of what they were before the appearance of the links on Yi.Org.

52. Both Defendants McDonald d/b/a Yi.Org and McDonald assisted in the dissemination of the false and negative information that damaged Plaintiffs' reputation and directly caused damages to Plaintiffs.

53. Plaintiff Brunel continues to own and operate Plaintiff MC2 to this day, both names still harmed by the false and negative association with escort services in Florida.

54. Accordingly, Plaintiffs have been severely damaged by information on websites hosted by Yi.Org, which is maintained, owned and operated by Defendants McDonald d/b/a Yi.Org and McDonald.

55. The information disseminated by the websites hosted by Defendants McDonald d/b/a Yi.Org and McDonald was false and defamatory to the extreme regarding Plaintiffs alleged involvement with escort services in the state of Florida.

56. Defendants McDonald d/b/a Yi.Org and McDonald have made no attempt to clear the names of Plaintiffs with regard to the false and defamatory information disseminated by the

websites they hosted.

57. Plaintiffs continue to do business to this day, their names never having been cleared from the negative information disseminated by Defendants McDonald d/b/a Yi.Org and McDonald.

58. Plaintiffs have been damaged by the conduct of Defendants McDonald d/b/a Yi.Org and McDonald, and have accordingly retained undersigned counsel to represent him in this matter, and are obligated to pay counsel a reasonable fee for his services.

**COUNT I – EQUITABLE RELIEF FOR LOSS OF BUSINESS AND REVENUE - AS TO  
DEFENDANT JEFFREY EPSTEIN**

59. The allegations contained in paragraphs 1 through 44 above are re-alleged and incorporated herein by reference.

60. Plaintiffs have lost a significant amount of business revenue because of the actions of Defendant Epstein set forth above.

61. Plaintiffs have no adequate legal remedy to make him whole as a result of the damages suffered in the form of lost business revenue due to the actions of Defendant Epstein.

62. Accordingly, Plaintiffs seeks to become whole by the payment of damages by Defendant Epstein to compensate him for his losses.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANT as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate.

**COUNT II – OBSTRUCTION OF JUSTICE – EQUITY - AS TO DEFENDANT  
JEFFREY EPSTEIN**

63. The allegations contained in paragraphs 1 through 44 above are re-alleged and incorporated herein by reference.

64. Plaintiff was forced to commit illegal acts by traveling away from the sight of the deposition and during the time period of the deposition.

65. Defendant Epstein attempted to subvert justice and this attempt contributed to the destruction of Plaintiff's business, Plaintiff MC2. Plaintiff Brunel lost substantial time away from his business and incurred expenses in following Epstein's commands.

66. Plaintiffs were substantially damaged as a direct result of Epstein's actions.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANT as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate.

**COUNT III – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS UPON  
PLAINTIFF BRUNEL - AS TO DEFENDANT JEFFREY EPSTEIN**

67. The allegations contained in paragraphs 1 through 44 above are re-alleged and incorporated herein by reference.

68. Defendant Epstein recklessly inflicted emotional distress upon Plaintiff Brunel by engaging in illegal conduct with under-aged girls, which was falsely linked to Plaintiffs.

69. This illegal conduct was extreme and outrageous by any standard.

70. This extreme and outrageous conduct was the direct cause of extreme emotional distress in Plaintiff Brunel.

WHEREFORE, PLAINTIFF BRUNEL requests judgment against DEFENDANT as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate

**COUNT IV – EQUITABLE RELIEF FOR LOSS OF BUSINESS AND REVENUE - AS TO DEFENDANTS TYLER MCDONALD AND MCDONALD D/B/A YI.ORG**

71. The allegations contained in paragraphs 1 through 3 & 45 through 58 above are re-alleged and incorporated herein by reference.

72. Plaintiff, through his agency MC2, has lost a significant amount of business revenue because of the actions of Defendants McDonald d/b/a Yi.Org and McDonald set forth above.

73. Plaintiffs have no adequate legal remedy to make him whole as a result of the damages suffered in the form of lost business revenue due to the actions of both Defendants.

74. Accordingly, Plaintiffs seek to become whole by the payment of damages by both Defendants to compensate him for his losses.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANTS as follows:

A. Damages in excess of fifteen-thousand dollars; trial by jury and

B. Grant other such relief as is appropriate.

**COUNT V – DEFAMATION AGAINST PLAINTIFFS – AS TO DEFENDANTS TYLER MCDONALD AND MCDONALD D/B/A YI.ORG**

75. The allegations contained in paragraphs 1 through 3 & 45 through 58 above are re-alleged and incorporated herein by reference.

76. Defendants McDonald d/b/a Yi.Org and McDonald published or caused to be published, false statements about Plaintiffs using their domain hosting service.

77. Defendants McDonald d/b/a Yi.Org and McDonald knew, or should have known, that the statements about Plaintiffs were false.

78. These published statements were read by the internet users who viewed the false statements.

79. Plaintiffs' business reputations were severely damaged as a result.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANTS as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate.

**COUNT VI – EQUITABLE RELIEF FOR REPAIR OF BUSINESS REPUTATION - AS TO DEFENDANTS TYLER MCDONALD & TYLER MCDONALD D/B/A/ YI.ORG**

80. The allegations contained in paragraphs 1 through 3 & 45 through 58 above are re-alleged and incorporated herein by reference.

81. Plaintiffs have also suffered a significant loss of their business reputations as a direct result of the actions of Defendants McDonald d/b/a Yi.Org and McDonald.

82. Plaintiffs have no adequate legal remedy to make them whole as a result of the damages suffered in the form of lost business reputations due to the actions of both Defendants.

83. Accordingly, Plaintiffs seeks to restore their business reputations by the payment of damages by both Defendants to compensate them for their loss of reputations.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANTS as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate.

/s/ Joe Titone

Joe Titone  
Attorney  
FL BAR #: 203882  
621 S.E. 5<sup>th</sup> Street  
Pompano Beach, Florida 33060

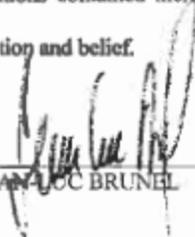
[REDACTED]  
[REDACTED] (FAX)  
[REDACTED]

VERIFICATION

STATE OF FLORIDA            )  
  )  
COUNTY OF MIAMI DADE    )

JEAN-LUC BRUNEL, being duly sworn according to law, upon his oath, deposes and says:

I have read the foregoing complaint and all the allegations contained therein. All such allegations are true based upon my personal knowledge, information and belief.

  
\_\_\_\_\_  
JEAN-LUC BRUNEL

Sworn and subscribed to before me this 1 day of August, 2014.



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

# **COMPOSITE EXHIBIT A**

<http://www.thedailybeast.com/articles/2010/07/29/jeffrey-epstein-feds-probe-possible-child-trafficking-charge.html>

## Epstein Faces Sex-Traffic Probe

The Justice Department is investigating Jeffrey Epstein for child trafficking, The Daily Beast has learned—and has widened the scope of its probe to include a famous modeling agency.

Hedge-fund manager Jeffrey Epstein completed his sentence for soliciting prostitution with a minor last week. But it appears his problems may not be over. Now The Daily Beast has learned that:

- **Federal investigators continue to investigate Epstein's activities, to see whether there is evidence of child trafficking—a far more serious charge than the two in his non-prosecution agreement, the arrangement between Epstein and the Department of Justice allowing him to plead guilty to lower-level state crimes. Trafficking can carry a 20-year sentence.**
- **The FBI is also investigating Epstein's friend Jean Luc Brunel, whose MC2 modeling agency appears to have been a source of girls from overseas who ended up on Epstein's private jets.**

Because Epstein's predatory habits stretch back many years and involved dozens of young-looking girls, there may well be more evidence to uncover.

Under the concept of double jeopardy, Epstein can no longer be prosecuted for any of the charges covered by his non-prosecution agreement, in which he agreed to serve a short term of incarceration, fund the civil suits of named victims, and register as a sex offender. The victims who accepted cash settlements in these civil suits agreed not to testify against him or speak publicly about the case. However, new evidence developed by the Department of Justice on other offenses not covered by the agreement, including allegations by additional victims who come forward, could lead to new charges. There is no statute of limitations in the federal sex-trafficking law, which was also enacted by the state of Florida in 2002. Because his predatory habits stretch back many years and involved dozens of young-looking girls, there may well be more evidence to uncover. (Several young women who claim to be Epstein victims have recently contacted a Ft. Lauderdale lawyer, but to date no new civil complaints have been filed.)

- **[REDACTED]: [The Billionaire Pedophile's Sex Den](#)**
- **[Billionaire Pedophile Goes Free](#)**

These new developments come one week after the publication of two articles in The Daily Beast about Epstein's pattern of sexual contact with underage girls, which Palm Beach police began investigating in 2005 and the U.S. Attorney's office then settled in a 2007 plea deal. The first

article quoted a deposition by then-Palm Beach Chief of Police Michael Reiter, in which he stated that Epstein, a billionaire with many powerful friends, had received special treatment in both his plea deal and the terms of his incarceration. Although federal investigators at one point produced a draft 53-page indictment against Epstein, he was eventually allowed to plead guilty to only two relatively minor state charges and receive a short term of incarceration: 13 months in the county jail, during which he went to the office every day, and one year of community control, during which he traveled frequently to New York and his private island in the Virgin Islands.

The Daily Beast has now discovered another instance in which Epstein apparently received special consideration: As a convicted sex offender, he is required by law to undergo an impartial psychological evaluation prior to sentencing and to receive psychiatric treatment during and after incarceration. This is because child molesters tend to be repeat offenders with high rates of recidivism. According to a source in law enforcement, however, Epstein was allowed to submit a report by his private psychologist, Dr. Stephen Alexander of Palm Beach, Florida, whose phone has since been disconnected with no forwarding information.

The Daily Beast's second article provided details about Epstein's systematic abuse of underage girls at his Palm Beach mansion, where members of his staff allegedly recruited and paid a parade of teenagers, most of them 16 or younger, to perform daily massages that devolved into masturbation, groping, and sometimes full-blown sexual contact. It also revealed a monetary relationship between Epstein and Jean Luc Brunel, a frequent visitor to whom he gave \$1 million around the same time that Brunel was starting his MC2 modeling agency. Some of the young girls MC2 recruited from overseas—often from Eastern Europe and South America—are known to have been passengers on Epstein's private jets.

The U.S. Attorney General's Office in Florida says that it is against policy to confirm or deny the existence of an investigation. Jeffrey Epstein's lawyer, Jack Goldberger, says he has no knowledge of an ongoing probe, and he told The Daily Beast, "Jeffrey Epstein has fully complied with all state and federal requirements that arise from the prior proceedings in Palm Beach. There are no pending civil lawsuits. There are not and should not be any pending criminal investigations, given Mr. Epstein's complete fulfillment of all the terms of his non-prosecution agreement with the federal government."

**[REDACTED]** *has developed multimedia communication programs for Fortune 500 companies and has produced three current-events debate TV programs, The Americas Forum, From Beirut to Kabul, and a segment for The Oppenheimer Report . She is writing a book about child trafficking in America*

## The Billionaire Pedophile's Sex Den

Hedge fund mogul and sex offender Jeffrey Epstein, who went free this week, lived in a depraved world of thrice-daily massages, pornographic artwork, and hush money—that's only now being revealed. [REDACTED] reports on the sordid details in part two of her exclusive exposé.

**Hedge fund mogul and sex offender Jeffrey Epstein, who went free this week, lived in a depraved world of thrice-daily massages, pornographic artwork, and hush money—that's only now being revealed. [REDACTED] reports on the sordid details in part two of her exclusive exposé. Also:**

- **Nude images of young girls were scattered around the house and the bathroom soap was shaped like sex organs**
- **Staff trolled for fresh recruits to make sure Epstein had two or three massage appointments each day**
- **The house manager has been sentenced to a longer prison term than Epstein—for trying to sell notes regarding massage appointments**
- **Epstein gave \$1 million to his friend Jean Luc Brunel when he was starting the modeling agency MC2**
- **According to a former bookkeeper, young girls were brought to the U.S. by MC2—often from Eastern Europe—then traveled on Epstein's private jets**

Jeffrey Epstein's loyal friends say that his prosecution was unduly harsh, rather than outrageously lenient. They insist that his sexual habits, although obsessive and unusual, were mostly legal and essentially harmless. As the police records attest, the girls brought to El Brillo Way were routinely told they could "say no" at any time during a massage as Epstein escalated contact in a step-by-step assault that was remarkably similar in every victim's statement: First she would be asked to remove her shirt, then her pants. He would attempt to fondle her buttocks and breasts as he masturbated, then bring out a large vibrator. There was sometimes digital penetration, and the more willing girls were lured into full-blown sexual relations with both Epstein and [REDACTED], who was referred to in press accounts and police reports as Epstein's live-in "sex slave."

A former bookkeeper in the Miami office, who also arranged visas for girls traveling to the U.S., confirmed that MC2 girls became frequent guests on Epstein's private jets.

It's true that some underage girls may have lied about their age, and some came to the house voluntarily several times—although, according to Florida statutes, none of that has any bearing on the criminality of the contact, particularly if the girl was 16 or younger. But what is particularly disturbing about this case—judging by arrangements at the Palm Beach house—is that Epstein, a billionaire hedge-fund manager, organized his life around this sexual compulsion in an open and methodical way that suggests he felt he was beyond the law.

- [REDACTED]: Epstein Faces Sex Traffic Probe
- Billionaire Pedophile Goes Free

According to police who executed a search warrant, the house was decorated with large, framed photos of nude young girls, and similar images were found stashed in an armoire and on the computers seized at the house (although police found only bare cables where other computers had been). Some bathrooms were stocked with soap in the shape of sex organs, and various sex toys, such as a “twin torpedo” vibrator and creams and lubricants available at erotic specialty shops, were stowed near the massage tables set up in several rooms upstairs.

Epstein also enlisted his staff in the predatory activity, and four—[REDACTED], [REDACTED], Lesley Groff, and [REDACTED]—figured in the FBI investigation. The Non Prosecution Agreement stipulated that they would not be charged. According to police reports and sworn statements in the civil suits, all four women, among their other duties, worked to ensure that an appointment book for twice- or thrice-daily “massages” was stocked with fresh recruits. Ghislaine Maxwell, daughter of the late Czechoslovakian-born press baron Robert Maxwell, who was for many years Epstein’s live-in partner, also recruited young girls.

Since his 13-month sentence for soliciting prostitution with a minor, Epstein has settled more than a dozen lawsuits brought by underage girls. Seven victims reached a last-minute deal last week, days before a scheduled trial; each received well over \$1 million—an amount that will hardly dent Epstein’s \$2 billion net worth.

The victims told police they waited in the kitchen to be called upstairs for a massage, and the house chef often gave them a bite to eat. House manager Alfredo Rodriguez said in his sworn statement that a maid named Lupita, who was a devout Catholic, wept when she complained to him about cleaning up after the massage sessions, picking up soiled towels and putting away the sex toys. And she was upset that a photo of Epstein with the pope hung next to one of him with a young girl.

Ironically, Rodriguez, who ran the house on El Brillo Way in 2004 and 2005, ended up being sentenced to more jail time than his boss as a result of the complex investigation into Epstein’s activities. He was fired, he says, for inadvertently drawing police attention to one of the girls when she arrived at the house unannounced to collect money. He saw an unfamiliar “beater” in the driveway one evening and called 911. When he left Epstein’s employ, Rodriguez took away some notes and emails about massage appointments as “protection” against his own prosecution, and failed to produce them during the Palm Beach Police Department’s initial investigation.

Unable to get work as a house manager elsewhere in South Florida, he says, Rodriguez later tried to sell this “golden nugget”—his term—for \$50,000, to be used in the victims’ civil suits.

Unfortunately, he made the offer to an undercover cop, and was subsequently charged with “obstruction of official proceedings” for withholding information that could have advanced the criminal investigation of Epstein—which by that point had been settled in a plea deal. Rodriguez was sentenced to 18 months in federal prison (Epstein was allowed to serve 13 months in the Palm Beach county jail), and now awaits an additional sentence on Aug. 24 in federal court in Miami for transporting firearms, another deal he says he made to pay the bills after he lost his job.

In a deposition given for the civil suits, Rodriguez testified that he was instructed to always have \$2,000 in cash on hand, so that he could pay both the girls who gave massages and recruiters such as [REDACTED] who brought them to the house. He also testified that Epstein made large contributions to the Palm Beach Police Department, and in return was given PBPD baseball hats to put on the dashboard of his various cars to avoid being stopped or ticketed by local police. Retired Police Chief Michael Reiter, in his own deposition, acknowledged that, in addition to earlier donations to the police department (which are fairly common in well-heeled Palm Beach), Epstein had recently given the department \$100,000 for some sophisticated equipment. The police were still researching the purchase when Epstein came under suspicion, and Reiter ordered the money returned. (Guy Frostin, one of Epstein’s local attorneys, told police that Epstein also gave \$100,000 to the Florida Ballet for massages, because he was “very passionate” about massages being “therapeutically and spiritually” beneficial. Yet victims told police they had no massage training.)

Perhaps most disturbing, in terms of possible sex trafficking, was Epstein’s relationship with Jean Luc Brunel, owner of the MC2 modeling agency. According to a complaint filed in the U.S. District Court for the Southern District of Florida, an alleged victim said that Epstein, Maxwell, Brunel, Rodriguez, and [REDACTED] “deliberately engaged in a pattern of racketeering that involved luring minor children through MC2, mostly girls under the age of 17, to engage in sexual play for money.” (Which would amount to trafficking.)

Brunel is a 50-plus French playboy who was formerly part owner of Karin, a Paris-based modeling agency. He lives in New York and South Beach, Florida, and owns 85 percent of MC2, which has offices in New York, Miami, and Tel Aviv. (The remaining 15 percent is owned by his partner, Jeff Fuller.) Brunel has been observed as a house guest at Epstein’s Palm Beach home and may well have had contact with him also in New York, where Epstein owns a lavish home, and in Paris, where Epstein keeps an apartment on elegant Ave. Foch.

CBS reporter Craig Pyes, who investigated Brunel for a *60 Minutes* broadcast many years ago, is quoted in Michael Gross’ book about the modeling industry, *Model: The Ugly Business of Beautiful Women*. Pyes told the author that Brunel “ranks among the sleaziest people in the fashion industry. We’re talking about a conveyor belt, not a casting couch. Hundreds of girls were not only harassed but molested.” Now *The Daily Beast* has learned that Epstein had made a \$1 million wire transfer to Brunel’s offshore bank account in September 2004, just as he was setting up MC2. Whether this was a gift or a loan or a backdoor investment in the new venture is unknown. A French citizen who managed to avoid giving evidence in the Epstein investigation, Brunel declined to comment on any of this, as does Fuller. Asked in April of Brunel’s activities,

Epstein said "I'm 100 percent convinced that he doesn't traffic children." (Brunel has never been charged.)

An American fashion designer who booked her girls through MC2 says they were very young and very beautiful; many were from Eastern Europe and spoke little English. A former bookkeeper in the agency's Miami office, who also arranged visas for girls traveling to the U.S., confirmed that MC2 girls became frequent guests on Epstein's private jets.

Pilot logs obtained in the civil suits show that some of the named plaintiffs were on the flight manifests. Other times, the pilot would just list the other passengers plus "female."

*Editor's Note: An earlier version of this article misidentified the subject of Craig Pyes' investigation and the title of Michael Gross' book. The Daily Beast has corrected the subject and title and regrets the error.*

Read [\[REDACTED\] original report on Epstein.](#)

*[REDACTED] has developed multimedia communication programs for Fortune 500 companies and has produced three current events debate television programs, The Americas Forum, From Beirut to Kabul, and a segment for The Oppenheimer Report. She is a contributor to The Huffington Post. She is writing a book about child trafficking in America.*

<http://fashioncopious.typepad.com/fashioncopious/2010/08/mc2-modeling-agency-involved-in-sex-trafficking.html>

## MC2 Modeling Agency Involved In Sex Trafficking

August 11,2010

On August 4th Jezebel ran the following story: [The Sex-Trafficking Model Scout](#).

Perhaps most disturbing, in terms of possible sex trafficking, was Epstein's relationship with Jean Luc Brunel, owner of the MC2 modeling agency. According to a complaint filed in the U.S. District Court for the Southern District of Florida, an alleged victim said that Epstein, [assistant and girlfriend Ghislaine] Maxwell, Brunel, [house manager Alfredo] Rodriguez, and [REDACTED] 'deliberately engaged in a pattern of racketeering that involved luring minor children through MC2, mostly girls under the age of 17, to engage in sexual play for money.

The previous paragraph in the story read:

and making [speaking of Jeffrey Epstein] frequent \$100,000 donations to the Palm Beach Police Department would insulate him from prosecution for his various depravities.

Which included, for the record: buying a 14-year-old Yugoslavian named Natalia [REDACTED] from her parents in order to keep [REDACTED] as his "sex slave"; paying a retinue of women to trawl Palm Beach for teenagers economically desperate enough to agree to give Epstein "massages" that often led to sexual contact; receiving two 12-year-old French girls as a "birthday present"; and befriending Michael Wolff.

<http://bettyfokker.wordpress.com/2010/08/20/hes-helping-others-get-away-with-child-sex-trafficking/>

## He's helping others get away with child-sex trafficking

Posted on August 20, 2010 by Betty Fokker

Let's discuss that billionaire douche-face child-rapist, Jeffrey Epstein for a moment shall we? He's someone who likes to have sex with venerable underage girls, including 12 year old girls who are trafficked into the US under the guise that they will become models. His partner in crime was Jean Luc Brunel, owner and 'talent scout' of the MC2 "modeling agency". Epstein coincidentally invested a million bucks in the MC2 ~~kiddie-porn-ring~~ modeling agency and let Brunel use his privet jet.

The FBI thinks Epstein has assaulted/molested about 40 or so young girls. So he's going to prison for the rest of his life right? Wrong.

When faced with the best defense lawyers money could buy, the prosecutors wimped out and made a plea bargain so light it boggles the mind. This kid-raping bastard only had to please guilty to two MINOR charges and gets a private cell, a cell he gets to leave on a "work release program" by the way.

Now, I am not blaming his defense attorneys. They were doing their job and, under our constitution, a festering anus like Epstein has the right to the best attorneys he can afford.

I am livid with the prosecuting attorneys. It was their job to do everything in their power to bring this vomit-inducing shit-sack to justice. Instead, they decided to gutlessly pander to his wealth, privilege, and powerful defense team. They rolled over and did everything but send in another kid to give this fucker a hand-job. So this vermin got away with raping 12 year old girls because the prosecuting attorneys couldn't find a single testicle/ovary to share among them.

And do you know what their chicken-shit kowtowing to Epstein has wrought? It's opened the door for other child-sex traffickers to get lighter sentences for their crimes too. Why should they have to pay when he didn't? After all, it was just girls they were trafficking for sex with disgusting older males (I refuse to call something like Epstein a "man"; it insults men) ... they weren't harming anything of any value in our culture!

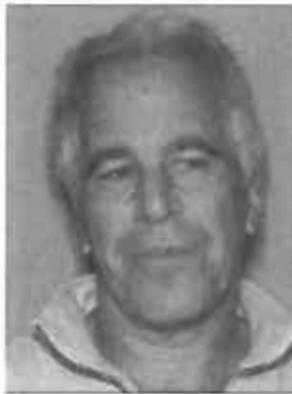
I'm a feminist because I think girls & women have value. What a crying, fucking shame there wasn't one feminist in the prosecutors office to go after this monster and punish him. What a pity other hell-spawn might get away with trafficking girls for sex more easily because of the shit-for-brains attorneys who let Epstein get away with his crimes.

My eyeballs are melting with rage.

Never mind. They aren't melting. It's just tears of helpless and despairing rage against an unjust legal system and the cultural devaluation of women and girls.

<http://gawker.com/5600294/recently-freed-sex-offender-jeffrey-epstein-may-face-child-trafficking-charges>

## Recently-Freed Sex Offender Jeffrey Epstein May Face Child Trafficking Charges



Bill How to Track this Offender	
Classification	Sexual Offender
Name	JEFFREY E. EPSTEIN
Agency	Supervision, IL Dept of Corrections
Department of Corrections ID	W0070
Supervision ID	Search the Dept of Corrections Website
State of Birth	ILLINOIS
Race	White
Sex	Male
Hair	Grey
Eyes	Blue
Height	6'00"
Weight	180 lbs

Expand

### Ads by Google

Jeffrey Epstein, the billionaire Bill Clinton pal who just left jail after completing a sentence for soliciting sex with a minor, may be headed back soon: The Daily Beast reports that the Justice Department is investigating him for child trafficking.

Epstein, famous for being rich, being friends with Bill Clinton, having an egg-shaped penis, and being a vindictive pervert, can't be prosecuted again for the charges he copped to in his plea deal. But according to The Daily Beast's [REDACTED], new charges might be coming:

As we learned in Vanity Fair yesterday, Bill Clinton has spent his post-presidential life...[Read more](#)

Federal investigators continue to investigate Epstein's activities, to see whether there is evidence of child trafficking—a far more serious charge than the two in his non-prosecution agreement, the arrangement between Epstein and the Department of Justice allowing him to plead guilty to lower-level state crimes. Trafficking can carry a 20-year sentence.

Since there's no statute of limitations for sex-trafficking, and Epstein's predatory adventures apparently date back more than a few years, it's likely there's more women who could come forward. (Apparently some have contacted a lawyer, but nothing's been filed yet.)

It's not just Epstein, either—his buddy Jean Luc Brunel, head of the MC2 modeling agency, is also being investigated, and some of the models he represented (many from overseas) may have been enlisted as companions on Epstein's private jet.

[http://www.huffingtonpost.com/2014/06/03/jeffrey-epstein\\_n\\_5439407.html](http://www.huffingtonpost.com/2014/06/03/jeffrey-epstein_n_5439407.html)

MIAMI (AP) — Nearly a decade ago, a wealthy financial guru came under FBI investigation, suspected of sexually abusing dozens of underage girls at his Palm Beach mansion. Then, abruptly, the investigation was dropped and Jeffrey Epstein pleaded guilty to a single state charge of soliciting prostitution. He served just over a year in jail.

Now, two women who say they were among his victims have won a precedent-setting appeals court ruling entitling them to see all the documents from the plea bargain discussions between Epstein's high-powered lawyers and federal prosecutors.

Their goal: use those files to undo the agreement, reopen the investigation and subject Epstein to more charges.

The women's lawyers contend Epstein got special treatment because of his wealth and connections. His attorneys deny that.

Epstein, 61, made hundreds of millions of dollars managing funds for rich clients. Shortly after his 2008 guilty plea, it came to light that his lawyers had secretly reached a non-prosecution agreement months earlier with the U.S. Justice Department that spared him a potentially heavier punishment.

"Our complaint alleges that, prodded by Epstein, the federal prosecutors deliberately concealed the sweetheart plea deal they made with him to avoid public criticism," said Paul Cassell, a University of Utah law professor who is representing the two women.

The U.S. attorney's office in Miami would not comment. But the U.S. attorney at the time, R. Alexander Acosta, said in a 2011 letter defending his office that more evidence came to light after Epstein made his deal.

"Many victims have spoken out, filing detailed statements in civil cases seeking damages. Physical evidence has been discovered," Acosta wrote. "Had these additional statements and evidence been known, the outcome may have been different."

Epstein has settled lawsuits for undisclosed amounts with many of the women who say they were underage when they were paid for sex.

The case represents the first time a federal appeals court has ruled that the Crime Victims' Rights Act of 2004 guarantees victims the right to be informed about the details of how a plea bargain was reached, according to legal experts and lawyers involved in the case. The law marked the culmination of efforts begun in the 1960s to give crime victims more of a say.

"I hope that the case will ultimately set an important precedent that federal prosecutors can't keep victims in the dark about the plea deals that they reach." Cassell said.

Epstein served 13 months of an 18-month sentence on the prostitution charge, sold his Palm Beach home in 2011 and now divides his time between a New York City home, a Caribbean island and an apartment in Paris, according to court documents. He also has a large New Mexico ranch.

He donates huge sums each year, particularly toward projects involving new medical treatments and artificial intelligence. His foundation established a Harvard University program that uses mathematics to study evolutionary biology, viruses and disease.

According to lawsuits filed by some of his accusers, Epstein relied on assistants to recruit underage girls to give him massages and perform sex acts. They were usually paid about \$200.

Some girls were notified about the investigation beginning in 2006. But they weren't told about the negotiations with federal prosecutors for at least nine months, despite a requirement in the Crime Victims' Rights Act that they be kept informed. The two women — who were 13 and 14 when the alleged assaults occurred — sued for the files and won.

"Although plea negotiations are vital to the functioning of the criminal justice system, a prosecutor and target of a criminal prosecution do not enjoy a relationship of confidence and trust when they negotiate," the appeals court said.

Federal prosecutors have begun turning over the documents.

Epstein's attorney, Roy Black, the celebrity lawyer who is also representing Justin Bieber in his DUI and resisting-arrest case in Miami Beach, declined to comment but has asked that the documents be kept from public view, and so far they have been.

In a May 23 court filing, Black said that there was no conspiracy between prosecutors and Epstein's team to violate the victims' rights law and that the non-prosecution agreement contained many provisions Epstein strongly opposed, such as registering as a sex offender and agreeing not to contest certain lawsuits.

"This was no sweetheart deal by any stretch of the imagination," Black said in court papers.

Even if a judge invalidates the plea deal, it will still be up to federal prosecutors to decide what to do.

"The court can't force the prosecutors to bring charges," said Matt Alexrod, a former federal prosecutor now in private practice in Washington.



Communications expert

## Regulating Modeling Agencies to Help Prevent Child Sex Trafficking

Posted: 02/10/2012 8:49 pm

In 2010, Jezebel, an online site, published "The Sex Trafficking Model Scout" warning about the dangers of deregulated modeling agencies in the U.S.

Given the growing number of modeling agencies that transport underage teenagers from foreign countries into the United States and the growing sex trade of underage girls in the U.S. why does this industry remain deregulated?

Since the advent of this business, modeling agencies have had free reign to scout teenagers from every state in the country as well as every nation in the world. Many of these teenage girls come from economically disadvantaged families and are offered none to very limited protection while traveling and working as "models."

Jezebel reported that Jean Luc Brunel, one of the cast of characters involved in the ongoing Jeffrey Epstein (a level 3 registered sex offender), eight-year-long case, has been working for over two decades with a succession of agencies in New York and Paris. According to media reports, Diane Sawyer produced a segment for CBS's *60 Minutes* featuring a sex scandal that eventually led Eileen Ford (founder of renowned Ford modeling agency) to stop working with Brunel.

Brunel's latest venture is the modeling agency MC2 based in South Beach, Fla. with satellite offices in New York and Tel Aviv. Since his agency is deregulated and "no criminal charges have been filed by any of his accusers" -- although many have tried to serve him including lawyers representing Epstein's victims, Brunel continues to hide behind his French citizenship to prevent depositions. "Trawling for 5'11" underage teenagers to work for his agency, MC2, or anyone else who requests, Brunel is free to scout for very young girls without limitations." Given his citizenship he also successfully avoided deposition in Epstein's sex related cases.

Like so many other reporters who have tried to report his side of the story when Jezebel contacted Brunel, "he did not respond to our interview request." According to Jezebel:

we spoke to a number of people who worked with his agency and while MC2 isn't considered a major industry player, it isn't exactly bottom-shelf, either... Brunel isn't involved with the business on a day-to-day basis, although he owns an 85 percent stake in MC2. Instead, he does scouting for the agency and takes care of the international relations with other agencies, reports one source. Scouts scour the world for unrepresented teenage girls who could make it as models. They work largely unsupervised and are generally paid a headhunting fee for every girl an agency signs. Even when affiliated with an agency, as Brunel obviously is with MC2, scouts operate mostly independently and with little oversight. The company blog refers to Brunel as a 'scouting tsunami' and MC2 is fairly well known for the strength of its international scouting.

*Model*, Michael Gross's 1995 book, describes Brunel's activities in Paris from the late 1970s onwards, when he worked for, and eventually owned, the modeling agency Karin. "Jean-Luc is considered a danger," says Jérôme Bonnouvrier. "Owning Karin was a dream for a playboy. His problem is that he knows exactly what girls in trouble are looking for. He's always been on the edge of the system."

John Casablancas, founder of Elite modeling agency said:

I really despise Jean-Luc as a human being for the way he's cheapened the business. There is no justice. This is a guy who should be behind bars. There was a little group, Jean-Luc, Patrick Gilles, and Varsano. They were very well known in Paris for roaming the clubs. They would invite girls and put drugs in their drinks. Everybody knew they were creeps." Casablancas was a professional rival who was pushed out of his agency for questionable concerns.

Katie Ford human trafficking abolitionist and Eileen Ford's daughter, talked to the *Wall Street Journal* magazine. In that [story](#) "A Model Trade Union," Ford describes herself as a "roving ambassador" to help stop human trafficking. Ford sold her stake in the family business in 2007 to the private equity firm Stone Tower Equity. "In her new life as a nearly full-time, unpaid, roving ambassador for the cause her job is an outgrowth of her former work, rather than a repudiation of it, or an atonement.

Her interest in human trafficking began when a representative of the United Nations called to ask if she would participate in a women's leadership group that was studying the issue of trafficking. "I said, 'I can't come talk about it, because I don't know anything about it!'" Ford recalls. "But I went, and after two hours, I knew why I was there. The way people traffic across borders is parallel to the way we recruit models. According to Ford "the target age is 14 to 24, and so it's similar to modeling." I knew how to reach that market" she said, "It was the feeling of: There but for the grace of God... The girls who came to us could have been those girls."

<http://jezebel.com/5603638/meet-the-modeling-agent-who-trafficked-underage-girls-for-sex>

## **The Sex-Trafficking Model Scout**



[Expand](#)

Jeffrey Epstein, the billionaire financier who the FBI believes molested around 40 underage girls, was assisted by a prominent modeling agent and scout. Here's what we know about Jean Luc Brunel.

Jeffrey Epstein, you will no doubt recall, is the man who thought ferrying Bill Clinton on his private jet, lawyering up with superstar Alan Dershowitz, and making frequent \$100,000 donations to the Palm Beach Police Department would insulate him from prosecution for his various depravities.

Say you're not as famous or celebrated as Roman Polanski and you want to sexually assault...[Read more](#)

Which included, for the record: buying a 14-year-old Yugoslavian named Natalia [REDACTED] from her parents in order to keep [REDACTED] as his "sex slave"; paying a retinue of women to trawl Palm Beach for teenagers economically desperate enough to agree to give Epstein "massages" that often led to sexual contact; receiving two 12-year-old French girls as a "birthday present"; and befriending Michael Wolff.

But as [REDACTED] wrote at The Daily Beast:

Perhaps most disturbing, in terms of possible sex trafficking, was Epstein's relationship with Jean Luc Brunel, owner of the MC2 modeling agency. According to a complaint filed in the U.S. District Court for the Southern District of Florida, an alleged victim said that Epstein, [assistant and girlfriend Ghislaine] Maxwell, Brunel, [house manager Alfredo] Rodriguez, and [REDACTED] 'deliberately engaged in a pattern of racketeering that involved luring minor children through MC2, mostly girls under the age of 17, to engage in sexual play for money.'

The FBI investigated Epstein, and identified around 40 underage victims. Sarnoff reports that the FBI is also investigating MC2 and Brunel for possibly engaging in child sex trafficking. Since pleading guilty to reduced charges of soliciting sex with a minor and serving 13 months of

part-time jail, Epstein has become the focus of numerous civil lawsuits from his victims. He has so far settled a dozen.

These same civil complaints allege that young girls from South America, Europe, and the former Soviet republics, few of whom spoke English, were recruited for Epstein's sexual pleasure. According to a former bookkeeper, a number of the girls worked for MC2, the modeling agency owned by Jean Luc Brunel, a longtime acquaintance and frequent guest of Epstein's.

Brunel, along with numerous young models, was a frequent passenger on Epstein's private jet, according to flight manifests. The agency owner also allegedly received \$1 million from Epstein in 2005, when he founded MC2 with his partner, Jeffrey Fuller; although Fuller and Brunel denied any such payment from the billionaire pervert in 2007, when rumors started swirling, Sarnoff got confirmation from a former bookkeeper at the agency. Whether the money was a secret investment in MC2, or a payment for Brunel's services as a procurer, is unknown. Brunel also visited Epstein in jail.

So who is Jean Luc Brunel? Although he did not respond to our interview request, we spoke to a number of people who have worked with his agency. While MC2 isn't considered a major industry player, it isn't exactly bottom-shelf, either: MC2 in New York most recently launched the career of Latvian editorial star Ginta Lapina (Brunel "discovered" Lapina via an MC2 scouting competition for young teens) and currently represents *Vogue* China covergirl Liu Dan. Worldwide, MC2 represents such stars as Sessilee Lopez in Miami, and top models Candace Swanepoel, Marina Lynchuk, Natalia Chabanenko, and Elisa Sednaoui in Tel Aviv.

Brunel isn't involved with the business on a day-to-day basis, although he owns an 85% stake in MC2. Instead, "Right now he does scouting for [the] agency and takes care of the international relations with other agencies," reports one source. Scouts scour the world for un-agented teenaged girls who could make it as models; they work largely unsupervised and are generally paid a headhunting fee for every girl an agency signs. Even when affiliated with an agency, as Brunel obviously is with MC2, scouts operate mostly independently and with little oversight — even relative to the almost totally unregulated modeling industry itself. "He travels a lot," says another person who has worked with Brunel. (The company blog refers to Brunel as a "scouting tsunami," and MC2 is fairly well-known for the strength of its international scouting.)

Models we spoke to report mostly positive experiences with Brunel — one praised his sense of humor and said he is "lovely to all of his models," and another described him as highly intelligent and cultured, adding, "he knows a lot about the opera and he paints" — although it should be noted that none of the models whom we spoke to had been told of either his connections with Epstein, or his past.

And what a past it is. These accounts from Michael Gross' 1995 book *Model* describe Brunel's activities in Paris from the late 1970s onwards, when he worked for, and eventually owned, the modeling agency Karins, now known as Karin Paris:

"Jean-Luc is considered a danger," says Jérôme Bonnouvrier. "Owning Karins was a dream for a playboy. His problem is that he knows exactly what girls in trouble are looking for. He's always

been on the edge of the system. John Casablancas gets with girls the healthy way. Girls would be with him if he was the butcher. They're with Jean-Luc because he's the boss. Jean-Luc likes drugs and silent rape. It excites him."

"I really despise Jean-Luc as a human being for the way he's cheapened the business," says John Casablancas. "There is no justice. This is a guy who should be behind bars. There was a little group, Jean-Luc, Patrick Gilles, and Varsano...They were very well-known in Paris for roaming the clubs. They would invite girls and put drugs in their drinks. Everybody knew they were creeps."

It should be noted that aside from being a professional rival, Casablancas, the founder of the agency Elite, was eventually drubbed out of the industry for his own modelizing. How pervy do you have to be for John Casablancas to call you a perv?

Pervy enough to drug and rape numerous teenagers, according to *60 Minutes* and Diane Sawyer, who investigated Brunel in 1988. The program interviewed nearly two dozen models who said they had been sexually assaulted by Brunel and/or by his fellow agent, Claude Haddad. Even at that time, Brunel had a reputation as a man one could go to to procure a "date" with a young model. CBS spoke to five models who said that Brunel and/or his friends had drugged and raped them. Said producer Craig Pyes, "Hundreds of girls were not only harassed, but molested."

When Gross interviewed Brunel, this is what he had to say for himself:

"You get laid tonight with a model, is that a crime? I don't understand why people go into your personal life, what you do yourself, and to yourself, and they don't look at things that are really important."

Since then, Brunel has been involved with a succession of agencies in New York and Paris. Although the *60 Minutes* scandal eventually led Eileen Ford to stop working with him, he continued his involvement with Karins. In 1988, when powerhouse agency Next opened its doors, Brunel took an ownership stake. He also "discovered" Christy Turlington when she was 14. MC2 is only his latest venture. Because no criminal charges were ever filed by any of his accusers, and because the industry has a short memory — most models working today weren't even born when Sawyer and Pyes started looking into Brunel's activities — Brunel has been free to continue as he pleases. A French citizen, he even avoided testifying in his friend Epstein's trial.

And so Brunel is still criss-crossing the globe, trawling for 5'10" 13-year-olds from Eastern Europe and (the whiter parts of) South America. And apparently taking the occasional ride with them on Epstein's private jet. Is there any better argument for the regulation of the modeling industry?

<http://nypost.com/2011/11/18/jeffrey-epsteins-level-3-sex-offender-status-upheld-by-ny-appeals-court/>

## **Jeffrey Epstein's Level 3 sex offender status upheld by NY appeals court**

By Dareh Gregorian

November 18, 2011 | 5:00am

Multimillionaire perv Jeffrey Epstein may not consider his Florida conviction for soliciting a minor a big deal, but New York does.

A state appeals court yesterday upheld the financier's status as a Level 3 sex offender — meaning he's considered "a threat to public safety" and a "high risk" to offend again.

Epstein, 58, did 13 months in a Florida jail for soliciting a minor to perform a sex act on him during a "massage."

Although he was never indicted or convicted for hiring any other underage girls, the state Appellate Division found there was "clear and convincing evidence" he had indeed done so, making the Level 3 designation appropriate.

<http://pagesix.com/2007/10/06/model-shop-denies-epstein-tie/>

## MODEL SHOP DENIES EPSTEIN TIE

By PageSix.com Staff - October 6, 2007 | 9:00am

THE owners of MC2 models are denying industry speculation that massage maven **Jeffrey Epstein** is a secret financial backer of the agency being run by scandal-scarred **Jean-Luc Brunel**, who was once accused of taking advantage of underage models.

Epstein, who this week agreed to plead guilty to soliciting underage prostitutes at his Florida mansion in a deal that will send him to prison for about 18 months, reportedly gave "millions" to start MC2, which opened in October 2005 with offices in New York, Miami and Tel Aviv. One of the girls Epstein, 54, was accused of soliciting massages from was described in court documents as being just 14.

"E equals MC squared . . . get it, like the equation? E equals Epstein. He just thinks everyone is too dumb to figure it out," said a model industry insider. "He's a desperate old man that fantasizes and takes advantage of young girls."

The trouble doesn't stop there.

Karins Models founder Brunel, who's currently a partner in MC2, denied allegations in a 1997 "60 Minutes" segment that he took advantage of young models who were high on drugs. Brunel also reportedly left his Trump Tower digs in 1999 after complaints of night carousing, which he also denied.

Disgraced former Elite models exec **Gerald Marie** is also involved with MC2, says our source.

Marie was accused of having sex with underage models in a 1999 BBC documentary where he was filmed saying he hoped to seduce contestants in a modeling contest in which the average age of participants was 15. He also dated **Linda Evangelista** when she was a teen.

"He's also involved in the agency," said the source. "Gerald and Jean-Luc like the same things. They hang out because they have young girls in common, like two guys who enjoy the same wine."

MC2 president **Jeffrey Fuller** confirmed Brunel was a partner in the company, but denied any working relationship with either Epstein or Marie.

"We have no relationship business-wise with Gerald Marie. Jeffrey Epstein has no ownership or involvement in our company and never has. Jean-Luc Brunel and I are the only two partners and owners of MC2 Model Management," Fuller said.

Epstein's rep said he was not involved in the agency. "He has no business relationship with them," said **Howard Rubenstein**.

<http://www.palmbeachdailynews.com/news/news/lawsuit-documents-link-jeffrey-epstein-to-modeling/nMGzH/>

## **Lawsuit documents link Jeffrey Epstein to modeling agency owner Jean Luc Brunel**

By Michele Dargan

Daily News Staff Writer

New court filings in a civil case filed by billionaire sex offender Jeffrey Epstein link Epstein and Jean Luc Brunel, owner of modeling agency MC2.

The documents say MC2 employees told attorney Brad Edwards that Epstein's condos at 301 E. 66th St. in New York City were used to house young models.

Edwards, who has sued Epstein on behalf of several women claiming to be victims of sex abuse by Epstein, was told MC2 brought underage girls in from all over the world, promising them modeling contracts.

"Epstein and Brunel would then obtain a visa for these girls, then would charge the underage girls rent," the documents say.

Through the investigation of his lawsuits against Epstein, Edwards learned Brunel "runs the modeling agency MC2, a company for which Epstein provides financial support," the documents say.

They also allege Epstein tried to thwart Edwards from taking depositions of Brunel, Epstein's companion Guislaine Maxwell, and other high-profile names such as President Bill Clinton.

Details are listed in more than 62 pages filed by attorney Jack Scarola on behalf of Edwards in the lawsuit Epstein filed against Edwards. Edwards represents four of Epstein's minor victims, three of whom have settled their cases with Epstein under a confidential agreement.

Epstein attorneys Christopher Knight and Joseph Ackerman declined to comment Friday on the court filings.

Edwards deposed Brunel, but his attorney delayed it and then said he was back in France with no plans to return. But according to the court papers, Brunel was staying with Epstein in Palm Beach during that period.

The court filings describe Brunel as one of Epstein's closest pals.

Regarding Maxwell, the documents refer to sworn testimony by Epstein's former house manager, Alfredo Rodriguez, explaining how Maxwell took photos of girls without the girls' knowledge, "kept the images on her computer, knew the names of the underage girls and their respective phone numbers and other underage victims."

According to the documents: Maxwell allegedly lied about her mother being ill and having to fly back to England one day before a scheduled deposition in Edwards' case against Epstein. Despite that assertion, Maxwell was captured in a photo for OK magazine, attending the wedding of Chelsea Clinton two days later.

Epstein has settled more than two dozen lawsuits and claims against him by young women who say they were lured to his El Brillo Way mansion as teens to give him sexually charged massages and/or sex in exchange for money. The terms of all settlements are confidential.

Rodriguez took a journal from Epstein's computer that listed the names of his underage victims from around the country and the world. Calling it the "Holy Grail," Rodriguez tried to sell the journal for \$50,000 to victims' attorneys. He pleaded guilty to obstruction of justice and is serving 18 months in federal prison.

Epstein, 57, served 13 months of an 18-month state sentence. He ended his one-year probation in July on state charges of soliciting prostitution and soliciting a minor for prostitution.

According to flight logs from Epstein's private planes, Clinton flew several times on Epstein's planes, many times with Maxwell, Palm Beach resident [REDACTED] and [REDACTED] — "all employees and/or co-conspirators of Epstein's," according to the court papers.

The documents show that Clinton flew with Epstein, "then suddenly stopped — raising the suspicion that the friendship abruptly ended ...

"Epstein's personal phone directory from his computer contains e-mail addresses for Clinton along with 21 phone numbers for him ... and what appears to be Clinton's personal numbers," the court papers say.

Allegations in the documents say Epstein threatened victims — including Edwards' client Jane Doe — despite no-contact orders in effect.

Epstein had Doe tailed by a private investigator as her trial date neared, the court filings say. One time, Doe was so frightened that she fled her home in the company of a retired police officer and was taken to a hiding place, according to the court papers.

<http://slaverytoday.org/that-gorgeous-underage-ad-model-may-be-trafficked-and-owned-regulation-for-agencies-to-stop-child-sex-trafficking/>

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## **That Gorgeous Underage Model May Be A Slave: Regulation For Agencies To Stop Child Sex Trafficking**

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Sexual Slavery  
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Forced Labor  
Child Soldiers  
Adoption Trafficking  
Organ Trafficking  
Trafficked Athletes*

*And now a new one I should have seen coming.*

*Those very young, foreign models you see? Some of them were trafficked by model scouts who literally trawled through some of the most destitute and vulnerable people on earth for them. The same methods as other predatory traffickers; Go to politically or economically unstable areas; locate 5'11" beautiful young girls; buy them, import them, own them, use them.*

*Horrible irony to have images that portray us to the world possibly be of slaves.*

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*All the traffickers have to do is pull out a magazine or phone with videos on it.*

*I'm not shocked at traffickers using this method of promises to lure unsuspecting girls into slavery, I've seen it, read about it, studied it. I'm in shock that it flourishes in the most visible,*

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*What will this say about us if we don't drastically change it? All of it.*

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Posted: 02/10/2012 8:49 pm

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*Model*, Michael Gross’s 1995 book, describes Brunel’s activities in Paris from the late 1970s onwards, when he worked for, and eventually owned, the modeling agency Karin. “Jean-Luc is considered a danger,” says Jérôme Bonnouvrier. “Owning Karin was a dream for a playboy. His problem is that he knows exactly what girls in trouble are looking for. He’s always been on the edge of the system.”

John Casablancas, founder of Elite modeling agency said:

I really despise Jean-Luc as a human being for the way he’s cheapened the business. There is no justice. This is a guy who should be behind bars. There was a little group, Jean-Luc, Patrick Gilles, and Varsano. They were very well known in Paris for roaming the clubs. They would invite girls and put drugs in their drinks. Everybody knew they were creeps.” Casablancas was a professional rival who was pushed out of his agency for questionable concerns.

Katie Ford human trafficking abolitionist and Eileen Ford’s daughter, talked to the *Wall Street Journal* magazine. In that [story](#) “A Model Trade Union,” Ford describes herself as a “roving ambassador” to help stop human trafficking. Ford sold her stake in the family business in 2007 to the private equity firm Stone Tower Equity. “In her new life as a nearly full-time, unpaid, roving ambassador for the cause her job is an outgrowth of her former work, rather than a repudiation of it, or an atonement.

Her interest in human trafficking began when a representative of the United Nations called to ask if she would participate in a women’s leadership group that was studying the issue of trafficking. “I said, ‘I can’t come talk about it, because I don’t know anything about it!’” Ford recalls. “But I went, and after two hours, I knew why I was there. The way people traffic across borders is parallel to the way we recruit models. According to Ford “the target age is 14 to 24, and so it’s

similar to modeling.” I knew how to reach that market” she said, “It was the feeling of: There but for the grace of God... The girls who came to us could have been those girls.”

<http://files.wallstreetfolly.com/wordpress/2007/10/jeffrey-epstein-doesnt-want-to-be-branded-as-a-sex-offender-for-life-and-no-hes-not-a-modeling-agency-secret-sugar-daddy-or-so-its-owners-say/>

**Jeffrey Epstein doesn't want to be branded as a "sex offender" for life, and no, he's not a modeling agency secret sugar daddy (or so its owners say)**

Posted by WSF On October - 9 - 2007



Jeffrey Epstein, the billionaire money manager who's agreed to plead guilty to soliciting underaged hookers and go away for 18 months, doesn't want to be branded a "sex offender" for life. Page Six says his lawyers are thinking about asking prosecutors to drop that requirement from his plea agreement:

In a letter drafted, but not sent, to U.S.

Attorney Alexander Costa and obtained by Page Six, Epstein's lawyer, Gerald Lefcourt, writes, "Doing so will have a profound impact [on Epstein] both immediately and forever after. Not only will he be restricted to a wholly inappropriate penal facility, but he will be required for the rest of his life to account for his whereabouts."

Meanwhile, over the weekend Page Six said that owners of MC2 modeling, run by Jean-Luc Brunel — who's also been accused of favoring underaged models in the past — claim that Epstein is not the secret deep pockets behind the firm, no matter what others say or speculate.

Epstein, .....reportedly gave  
"millions" to start MC2, which opened in October 2005 with offices in  
New York, Miami and Tel Aviv. One of the girls Epstein, 54, was accused of  
soliciting massages from was described in court documents as being just 14.

"E equals MC squared . . . get it,  
like the equation? E equals Epstein. He just thinks everyone is too dumb to  
figure it out," said a model industry insider. "He's a desperate old  
man that fantasizes and takes advantage of young girls."

"Jeffrey Epstein has no ownership or involvement in our company and never has. Jean-Luc  
Brunel and I are the only two partners and owners of MC2 Model Management," [Jeffrey] Fuller  
said. [MC2 President]

<http://www.washingtonpost.com/news/volokh-conspiracy/wp/2014/04/21/eleventh-circuit-rules-that-discovery-can-move-forward-on-my-crime-victims-rights-act-case/>

The Volokh Conspiracy

## **Eleventh Circuit rules that discovery can move forward on my Crime Victims' Rights Act case**

By Paul Cassell April 21

On Friday, the 11th Circuit ruled that discovery can move forward in an important Crime Victims' Rights Act case that my co-counsel, Brad Edwards, and I are pursuing. The narrow issue before the court was whether prosecutors and defense attorneys could assert some sort of "privilege" to prevent crime victims from reviewing the correspondence that lead to a plea bargain. More broadly, the ruling means that the victims will have a chance to return to the district court and seek to invalidate a plea agreement that (we alleged) was consummated in violation of their rights. I hope that the case will ultimately set an important precedent that federal prosecutors can't keep victims in the dark about the plea deals that they reach.

Here are the important facts, taken from the 11th Circuit's opinion: The case arose in 2006, the FBI began investigating allegations that wealthy investor Jeffrey Epstein had sexually abused dozens and dozens of minor girls. The U.S. Attorney's Office for the Southern District of Florida accepted Epstein's case for prosecution, and the FBI issued victim notification letters to my two clients, minors Jane Doe No. 1 and Jane Doe No. 2, in June and August 2007. Extensive plea negotiations ensued between the prosecutors and Epstein. On Sept. 24, 2007, the prosecutors entered into a non-prosecution agreement with Epstein in which they agreed not to file any federal charges against Epstein in exchange for his guilty plea to minor Florida offenses (e.g., solicitation of prostitution). Not only did the prosecutors neglect to confer with the victims before they entered into the agreement with Epstein, they also concealed its existence for at least nine months. For example, the prosecutors sent post-agreement letters to the victims reporting that the "case is currently under investigation" and explaining that "[t]his can be a lengthy process and we request your continued patience while we conduct a thorough investigation."

On June 27, 2008, the prosecutors informed my co-counsel, Brad Edwards, that Epstein planned to plead guilty to the Florida charges three days later. But the prosecutors failed to disclose that Epstein's pleas to those state charges arose from his federal non-prosecution agreement and that the pleas would bar a federal prosecution. As a result, the victims did not attend the state court proceedings.

On July 7, 2008, Edwards and I filed a petition alleging that Jane Doe No. 1 was a victim of federal sex crimes committed by Epstein and that the United States had wrongfully excluded her from plea negotiations. We also alleged that the federal prosecutors had violated her rights under the Crime Victims' Rights Act (CVRA) — specifically her rights to confer with the government, to be treated with fairness, to receive timely notice of relevant court proceedings, and to receive information about restitution. The United States responded by claiming that it used its “best efforts” to comply with the rights afforded to victims under the CVRA, but that the act did not apply to pre-indictment negotiations with potential federal defendants.

After Jane Doe No. 2 joined the initial petition, the district court (Marra, J.) found that both women qualified as “crime victims” under the CVRA. The district court later rejected the government's argument that the act only applies after the filing of a federal criminal indictment. (I've written a law review article about the issue of how early crime victims' rights attach in the criminal process, which can be downloaded [here](#).)

Among other relief, we sought rescission of the non-prosecution agreement as a remedy for the violation of the victims' rights. To make the case for such a remedy, we moved for discovery of the correspondence between the U.S. and Epstein's attorneys during the plea negotiations. Epstein's attorneys intervened, arguing that Federal Rule of Evidence 410 and Federal Rule of Criminal Procedure 11 create a privilege for plea negotiations, barring release of the correspondence. They also argued that the court should find that the materials were protected under the work product doctrine or, alternatively, should be protected under a new “common-law privilege for plea negotiations.”

The district court first ruled that rescission of the plea agreement was a possible remedy under the act. The court then ruled that we were entitled to review the correspondence, rejecting all of Epstein's arguments.

On Friday, the 11th Circuit affirmed the district court's ruling that we could review the plea correspondence. At pp. 18-22 of its published opinion, the court concluded that there was no basis for restricting access to such correspondence when crime victims have a legitimate need to review it. The court rejected, for example, the work product argument because plea discussions are not confidential:

Disclosure of work-product materials to an adversary waives the work-product privilege. See, e.g., *In re Chrysler Motors Corp. Overnight Evaluation Program Litig.*, 860 F.2d 844, 846 (8th Cir. 1988); *In re Doe*, 662 F.2d 1073, 1081–82 (4th Cir. 1981). Even if it shared the common goal of reaching a quick settlement, the United States was undoubtedly adverse to Epstein during its investigation of him for federal offenses, and the intervenors' disclosure of their work product waived any claim of privilege. . . .

The court also declined to recognize a new privilege for plea bargaining, finding the relationship between prosecutors and defense attorneys did not need special protection:

As a last-ditch effort, the intervenors contend that “[i]f more is needed in addition to the plain language of Rule 410 to preclude disclosure of the correspondence to plaintiffs, it can be found

in the conjunction of Rule 410, the work-product privilege, and the Sixth Amendment right to the effective assistance of counsel in the plea bargaining process,” but this novel argument fails too. As explained above, Rule 410 does not create a privilege and the intervenors waived any work-product privilege. The intervenors concede too that the right to counsel under the Sixth Amendment had not yet attached when the correspondence was exchanged. *Lumley v. City of Dade City, Fla.*, 327 F.3d 1186, 1195 (11th Cir. 2003) (“[T]he Sixth Amendment right to counsel ordinarily does not arise until there is a formal commitment by the government to prosecute,” such as a “formal charge, preliminary hearing, indictment, information, or arraignment.”). The “conjunctive” power of three false claims of privilege does not rescue the correspondence from disclosure. . . .

The Supreme Court has identified several considerations relevant to whether a court should recognize an evidentiary privilege—the needs of the public, whether the privilege is rooted in the imperative for confidence and trust, the evidentiary benefit of the denial of the privilege, and any consensus among the states, *Jaffee v. Redmond*, 518 U.S. 1, 10–15 (1996)—but none of these considerations weighs in favor of recognizing a new privilege to prevent discovery of the plea negotiations. Although plea negotiations are vital to the functioning of the criminal justice system, a prosecutor and target of a criminal investigation do not enjoy a relationship of confidence and trust when they negotiate. Their adversarial relationship, unlike the confidential relationship of a doctor and patient or attorney and client, warrants no privilege beyond the terms of Rule 410. *See Jaffee*, 518 U.S. at 10. But the victims would enjoy an evidentiary benefit from the disclosure of plea negotiations to prove whether the United States violated their rights under the Act.

Moving forward, this case raises the important issue of what kinds of remedies are available for violations of the Crime Victims’ Rights Act. Our complaint alleges that, prodded by Epstein, the federal prosecutors deliberately concealed the sweetheart plea deal they had reached with him to avoid public criticism of the deal. I am hopeful that in future district court proceedings, we will be able to prove that clear violation of the CVRA and then obtain the remedy of invalidating the illegally-negotiated plea deal.



Paul G. Cassell teaches criminal law, criminal procedure, and crime victims’ rights at the S.J. Quinney College of Law at the University of Utah. Before coming to Utah, he was President of the Stanford Law Review, a law clerk for then-Judge Antonin Scalia on the D.C. Circuit and for Chief Justice Warren Burger of the Supreme Court, an Associate Deputy Attorney General with the U.S. Justice Department (1986-88), and an Assistant U.S. Attorney for the Eastern District of Virginia (1988 to 1991). Cassell joined the faculty at the University of Utah College of Law in 1992, where he taught full time until he was sworn in as a U.S. District Court Judge for the District of Utah in 2002. In 2007, he resigned his judgeship to return full time to the College of Law, to teach, write, and litigate on issues relating to crime victims’ rights and criminal justice reform.

----- Original message -----

From: Jolanta MODILINOS  
Date: 15/10/2014 4:46 PM (GMT+02:00)  
To: Jean Luc Brunel  
Subject:

Dear Jean Luc,

Hope that you stay fine.

As per our conversation about placement of her with you in NYC and Miami, she said she found some article in internet, which changed her position and she preferred to be placed with another agency..

I am so sorry, but people believes in media more than in us sometimes, what is sad!

Warmest regards

***Jolanta Sadauskiene***

*owner*

***MODILINOS model agency    MODILINOS models***

*Parodos 7-4, Kaunas                      Sv. Stepono 7, Vilnius*

*tel/fax: +37037323257                      cell: +37069816103*

*[jolanta@modilinos.com](mailto:jolanta@modilinos.com)                      [info@modilinos.com](mailto:info@modilinos.com)*

***[www.modilinos.com](http://www.modilinos.com)***

**EXHIBIT B**

EFTA01122293

From: "Vladimir Yudashkin @ 1 MotherAgency"  
Date: 17/10/2014 10:46 AM (GMT+02:00)  
To: Jean Luc Brunel  
Subject: The situation with Liza Zazdravnih

Dear JeanLuc,

Unfortunately I need to announce that Liza Zazdravnih rejected signing the contract with MC2 in United States. Initially she intended to sign the contract, but later on she came across that article in internet about you involved in illegal activities with young models. This information somehow changed her intentions completely. she is ready to be a model and consider contracts with other agencies, but she has suspicions that you will force her to illegal activities and she made the decision to don't put her self in risk.

Lets keep in touch. I will be happy to work with you next time if we have another right model for you. Im upset that it didn't work out with Liza

Sincerely,  
Vladimir

Vladimir Yudashkin  
Director

**EXHIBIT C**

EFTA01122294

----- Original message -----

From: Manuela - Mega Partners

Date: 17/10/2014 9:36 PM (GMT+02:00)

To: Jean Luc Brunel

Subject: MC2

Dear Jean Luc,

I'm very happy to hear you're coming to the agency with Vini so we can talk about us working with MC2 again.

I don't need to remind you that the sex trafficking allegations have stopped us from working with your agency for the past 5-6 years – but as Vinicius is my friend, I will try to find a girl that already knows and trusts him to place with you.

Thank you very much for the lovely bag and we'll see each other on fashion week.

Kisses.

Manuela



MANUELA W MARTINEZ

International Relations

Phone: + [REDACTED]

Direct: [REDACTED]

Cell.: + [REDACTED] 00 [REDACTED]

[megamodelbrasil.com.br](http://megamodelbrasil.com.br)

**EXHIBIT D**

EFTA01122295

Original Message-----

From: Lorraine <[REDACTED]>

Organization: MC2 MM

Reply-To: <[REDACTED]>

Date: Friday, August 27, 2010 at 8:49 PM

To: <[REDACTED]>, Jean Luc Brunel <[REDACTED]>, Pink <[REDACTED]>

Subject: FW: Press Inquiry from AFP (Agence France Presse)

Videographer-- [REDACTED]

>

>

>-----Original Message-----

>From: [REDACTED] [mailto:Michelle.Stockman@afp.com]

>Sent: Friday, August 27, 2010 11:03 AM

>To: [REDACTED]

>Subject: Press Inquiry from AFP (Agence France Presse)

>Videographer-- [REDACTED]

>

>My name is [REDACTED] and I am a video journalist for Agence France

>Presse, the French newswire. We produce 1.5 to 2 min. videos that are

>distributed internationally to broadcast clients in Europe and Asia, and

>internet clients worldwide. In preparation for Fashion Week, my print

>colleague and I are interested in doing a piece on trends in casting

>models

>of color. I was wondering if you could refer me to a model of color and a

>casting director who can comment on her experience.

>

>My deadline is next week, so I would like to set something up for Monday

>or

>Tuesday. I can come to you as I am a one-person camera crew. When you

>have

>a moment, please let me know. I'd be happy to discuss with you over the

>phone ahead of time.

>

>Best regards,

> [REDACTED]

>

>

>

>

>

**EXHIBIT E**

> [REDACTED]  
>www.youtube.com/AFP  
>  
>Agence France-Presse is the world's oldest newswire with journalists in  
>165  
>countries. We publish worldwide in English, French, Spanish, German,  
>Portuguese and Arabic. AFP delivers the news to thousands of media outlets  
>worldwide from newspapers to magazines, radio and TV stations and online  
>services. It reaches an audience of more than one billion people daily.  
>This e-mail, and any file transmitted with it, is confidential and  
>intended  
>solely for the use of the individual or entity to whom it is addressed. If  
>you have received this email in error, please contact the sender and  
>delete  
>the email from your system. If you are not the named addressee you should  
>not disseminate, distribute or copy this email.  
>  
>For more information on Agence France-Presse, please visit our web site at  
><http://www.afp.com>  
>

## EXHIBIT E

Sent from Samsung Mobile

----- Original message -----

From: Michael Sanka  
Date: 12/12/2014 12:48 (GMT-05:00)  
To: Jean Luc Brunel  
Subject: Scouting

Jean Luc,  
How are you?

After so many years scouting for you and having a great network of agencies all around the world who enjoy to work with us, i wanted to let you know that we are on the way to lose everything we build and we are gonna have big problem now.

Agencies, still want to work with us but parents don't want their daughters to come to us, because when they google your name and the agency name the only things they see is "Sex Trafficking"!!!

It's impossible to sign a new girl and if nothing it's done i can tell you that in 3 months we we will not get any new girls and i don't see how the agency will work without new faces.

All the agencies who know you don't have any problems with you since they all told me "We know Jean Luc for more than 20 years and all those years we had so many girls place with him who had better experience than in any other agencies who were representing them as well and we never had any problems whatsoever, all our girls had great carriers as a model when he represented them".

I understand those agencies because it's hard for them to talk to parents and explain that it's not the truth when it's all over the internet.

You need to have it stop and have the people write an official letter to say that it's not the truth...

I will keep you posted of course but it's really bad for us and the scouting.

Best regards

-

Michael Sanka  


**EXHIBIT F**

EFTA01122298



Attn: Scouting division MC2  
We took notes of your comments and the girls that you like on our website.

We know Jean Luc Brunel and we always work with him since more than 10 years all those years and never had any problems.  
All the girls he represented from us never had any problems, they were working have great book work with good clients in editorial and campaigns and were well represented models.

Now for all the new faces we have, we needed to talk to their parents to discuss about mc2 and you interest to represent their daughters and of course they google it and saw all the bad articles about sex trafficking they were scared and I was myself speechless since we know that it's not true but it was hard for us to explain to the parents.

So of course for the moment till all is clarified we can't place any new faces with you because the parents will refuse and it makes us look bad to propose the girls to your agency.

We are sorry but you really need to clarify everything, till then we will have to cease any collaboration and we will have to refuse to let you represent any of our models.

Sure you understand.

Sandra Petkanic  
Fox Fashion Agency

[www.foxmodel.com](http://www.foxmodel.com)

e-mail: [REDACTED]

Tel [REDACTED]

tel fax [REDACTED]

Beograd 11000, Svetogorska 35 v. stan 12

**EXHIBIT G**

EFTA01122299

1 Q As part of your employment with MC Square  
2 did you live in New York, for a time?

3 A I'm sorry, but I take the Fifth.

4 Q Have you ever heard any model of MC Square  
5 who at the time of being a minor, that means under  
6 the age of eighteen, made an accusation that  
7 Jean-Luc Brunel acted inappropriate with her?

8 A Never. And that is something that I will  
9 not answer. And I said never because even when  
10 peoples come and ask me I will always say the truth  
11 regarding that.

12 I know Mr. Brunel for the longest --  
13 maybe eight years. And I always said what I know.  
14 I never saw and I never knew that he did anything.

15 So I know that. And that's the truth.  
16 Never. I never heard anybody accusing Mr. Brunel  
17 or complaining about Mr. Brunel. Nothing.

18 Q That means -- that means at any time no  
19 model, no minor model came to you and said, you  
20 know, "██████████, look what just happened to me", that,  
21 "something bad happened to me".

22 A Maybe a model came and told me, "██████████,  
23 look what happen to me. I don't have any money," or  
24 "I don't have a place to live". Or, "Look, I didn't  
25 get my ticket", or whatever.

## EXHIBIT H-1

1 a --

2 MR. OBRONT: Well, I would object, because  
3 of circumstances.

4 BY MR. DAVID:

5 Q But you said before that you never heard  
6 anything that would indicate that Jean-Luc Burnel  
7 behaved inappropriately with -- with any models,  
8 especially any minor models that MC Square may have  
9 had.

0 Is that correct?

1 A Yeah, I said what is the truth. Nobody  
2 complain to me. Nobody -- your question was very  
3 clear, has any girl come to you and complain about  
4 sexually, you know, involved with Mr. Brunel.

5 Q Right.

6 A And my answer was no. Nobody came to tell  
7 me. I never saw. I never knew. His personal life  
8 was not my problem.

9 Q Do you have any actual knowledge, that is  
0 to say were you present or did you see with your own  
1 eyes, any minor models go with Jean-Luc Burnel to  
2 Jeffrey Epstein's home, or any party of his?

3 MR. OBRONT: Objection.

4 THE WITNESS: I'm sorry, but I take the  
5 Fifth.

**EXHIBIT H-2**

# **COMPOSITE EXHIBIT I**

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

FILED

NOV 09 2007

Case No: 07-10931  
Judge: Schlesinger

STATE OF FLORIDA

Marta Vasquez, Defendant

PLEA AGREEMENT

COMES NOW KATHERINE FERNANDEZ RUNDLE, State Attorney of the Eleventh Judicial Circuit of Florida, by and through the undersigned Assistant State Attorney, and enters the following agreement with the Defendant, to-wit, that the Defendant shall plead guilty to Count one (1) and be adjudicated guilty, while Count two (2) will be nolle prossed and the Defendant will be sentenced as follows:

1. One (1) years Community Control followed by nineteen (19) years probation with the special condition of restitution of \$18,000.00 to Kain Models, LLC at a minimum monthly payment of \$100.00 per month.

2. The Defendant shall be eligible for early conversion of the Community Control to probation upon payment to the victim through the Department of Corrections of \$25,000.00 towards the restitution.

3. The Defendant shall be eligible to early conversion of the probation to summary probation after a total of two (2) years of either community control or probation if the restitution is paid in full.

4. The Defendant shall be eligible to early termination of probation after three (3) years if the restitution is paid in full.

Entered into this 3<sup>rd</sup> day of November, 2007, in Miami, Miami Dade County, Florida.

Respectfully submitted,

KATHERINE FERNANDEZ RUNDLE  
STATE ATTORNEY

By: [Signature]  
Thomas W. Malone  
Assistant State Attorney  
Fla Bar # 322438172

[Signature]  
Marta Vasquez  
Defendant  
+restite 1800-324489-764

[Signature]  
Curt Oberhelman  
Attorney for the defendant  
Florida Bar #

[Signature]  
Curt Oberhelman  
Circuit Court Judge

EXHIBIT I



Date: 11/11/71  
Page: 1

1. I am a citizen of the United States.
2. I am over 18 years of age.
3. I am not married, divorced, or widowed.
4. I am not a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
5. I am not a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
6. I am not a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
7. I am not a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
8. I am not a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
9. I am not a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
10. I am not a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.

I understand that the following conditions apply to my application for a passport:

1. I must be a citizen of the United States.
2. I must be over 18 years of age.
3. I must not be a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
4. I must not be a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
5. I must not be a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
6. I must not be a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
7. I must not be a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
8. I must not be a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
9. I must not be a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.
10. I must not be a member of the Communist Party, the Socialist Party, or any other organization which advocates the overthrow of the Government of the United States.

I understand that the following conditions apply to my application for a passport:

I understand that the following conditions apply to my application for a passport:

*[Handwritten signatures and stamps]*

EXHIBIT I



FILED

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA - FALL TERM, 2008

THE STATE OF FLORIDA v  
NADIFA TANQUEZ

INFORMATION FOR  
1 GRAND THEFT FIFTH DEGREE 812.013, 1 (2)(a) Fla  
10  
2 ORGANIZED FRAUD - SCHEME TO DEFRAUD 817.01  
15 MORE  
817.01(3)(a) Fla 10

Attorney for

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA:  
KATHERINE FERRANDEZ RUNDLE, State Attorney of the Eleventh Judicial Circuit,  
Prosecuting for the State of Florida in the County of Miami-Dade. Inasmuch as the undersigned  
Assistant State Attorney, under oath, information states that

ALICE THOMAS W. M. GUILBERT  
Circuit Court Director  
JN No: 07022947 Pkt: 1477807 C: 004284 WT: DOB: 10/25/1967 SSS  
MFL: 0000  
Docketing Fee:

COUNT 4

MARITZA VASQUEZ, on or between May 21, 2004 and June 30, 2006, in the County and State aforesaid, did knowingly, unlawfully and feloniously obtain or use her credit card to obtain or use U.S. dollars in currency, the property of KARIN MOORE USA, LLC and/or JEAN LUC BRUNEL and/or JEFF FULLER as owner or custodian, subject to one or more thousand dollars (\$100,000.00) or more, with the intent to either temporarily or permanently deprive KARIN MOORE USA, LLC and/or JEAN LUC BRUNEL and/or JEFF FULLER of a right to the property or of a benefit therefrom or to appropriate the property to said defendant's own use or to the use of any person, as defined in the provisions of sections 812.014(1) and (2)(b) Fla. Stat., contrary to the form of the Statute in such cases made and provided and against the peace and dignity of the State of Florida.

COURT 2

And the undersigned Assistant State Attorney, under oath, for the information of the MARITZA VASQUEZ, on or between May 21, 2014 and June 30, 2016, in the County and State aforesaid, did unlawfully and feloniously engage in a scheme to defraud as defined by s. 817.034(3)(d) Fla. Stat., by causing or a systematic, ongoing course of conduct with intent to defraud one or more persons, to wit: MARTIN MCCOY, USA, LLC and/or JAVIER LUC BRUNEL, and/or JEFF FULLER by false or fraudulent pretenses, representations, or promises or willful misrepresentations of a future act, and to thereby obtain property, to wit: U.S. CURRENCY, of an aggregate value of fifty thousand dollars (\$50,000.00) or more, the property of MARTIN MCCOY, USA, LLC and/or JAVIER LUC BRUNEL and/or JEFF FULLER, as owner or co-owner, in violation of s. 817.034(3)(d) Fla. Stat., contrary to the form of the Statute in such cases, to be and prevail, and against the peace and dignity of the State of Florida.

1279-112309

STATE OF FLORIDA, COUNTY OF MIAMI-DADE:

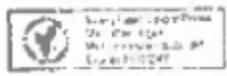
Personally known to me and appeared before me, the Notary Public Attorney at the Circuit Judicial Court of Florida whose signature appears below, being first duly sworn, says that the foregoing is true in the information as stated upon facts which have been received as true by immediate or other witnesses, and which of these would be a legally reliable source stated, and that his production is true and correct.

*[Handwritten Signature]*  
Notary State of Florida, No. 32253  
1101 NW 151 St., Miami FL 33132-1000

State to and appeared before me, *[Handwritten Name]*, Notary



*[Handwritten Signature]*  
Notary Public



A. ESTRA ALECCANDRINI

CASALEZ, MARIA ZA  
 1263 and 21 rd. 14.00 Fl 32145  
 S/A

1263 and 21 rd. 14.00 Fl 32145					
1263 and 21 rd. 14.00 Fl 32145	23.00	3.38			
1263 and 21 rd. 14.00 Fl 32145	4.15m				

Section Height 10.00	1.5.2014				
Sectional Scheme #	1.4.1.234 (4)A(1)				

21.00m 54.00m - 846.00m 10.00m 20.00m  
 Def was completed at the road level for the return  
 highway from approximately 10.00 to 10.00m with  
 slopes Def completed in excess of 10.00m by  
 not only checks during construction phase  
 including for the Def completed in excess of 10.00m  
 basis of 10.00m in excess of 10.00m and the  
 highway Def completed in excess of 10.00m

1263 and 21 rd. 14.00 Fl 32145	12.00				
1263 and 21 rd. 14.00 Fl 32145	12.00				

EXHIBIT I

**COMPOSITE  
EXHIBIT J -  
VISA**

REGISTRATION NUMBER DAC 11 114-81807		CATEGORY CODE PETITION FOR A NONIMMIGRANT WORKER	
EXPIRES JUN 24, 2011		PETITIONER MCS MODEL MARK LLC	
APPROVAL DATE September 8, 2011		CLASS OF WORKER I-1	
LUDU POPH EDU POPT LAW GROUP PA. 1440 HOLLYWOOD BLVD SUITE 418 HOLLYWOOD FL 33021		Notice Type: APPROVAL NOTICE Class of Valid From 10/01/2011 to 09/30/2014 CONTRACTOR RATE	
<p>The above petition has been approved, and notification has been sent to the listed consulate. You may also send the visa application to the consulate in your country. Please contact the consulate with any questions about visa issuance. This form is not a visa and is not valid for a visa.</p> <p>Consulate approval does not authorize employment. When the consulate issues a visa based on this petition they can issue only the visa number, but only as outlined in the petition. For the period authorized please contact the DSO with any questions about visa issuance.</p> <p>It is recommended that you contact the consulate near the time you are possibly another consulate of this approval. If you are the worker you already in the U.S. the consulate will issue you a new Form I-94 to work or change or extend your status based on this petition. Changes in employment also require a new petition. Include a copy of this notice with any other required documentation.</p> <p>The approval of this visa petition does not in itself guarantee status and does not guarantee that the alien beneficiary will automatically be found to be eligible for a visa. The beneficiary to the United States or for an extension, change or adjustment of status.</p>			
Number of entries: 1		Class Consulate or POB SI PARIS	
Name: DOB: UIC: POB: PASSPORT: 2001 100 0000000000 09/10/1984 FRANCE		Class Consulate or POB: SI PARIS	

Please see the additional information on the back. You will be notified separately about any other visas you filed.  
U.S. CITIZENSHIP & IMMIGRATION SVCS  
SERVICE SERVICE CENTER  
78 LOMA WALKER STREET  
SUITE 4100 FT 00478-0001  
Customer Service Telephone: (800) 375-5282  
Form I-797B (Rev. 09/27/09)

REGISTRATION NUMBER DAC 11 114-81807		CATEGORY CODE PETITION FOR A NONIMMIGRANT WORKER	
EXPIRES JUN 24, 2011		PETITIONER MCS MODEL MARK LLC	
APPROVAL DATE September 8, 2011		CLASS OF WORKER I-1	
LUDU POPH EDU POPT LAW GROUP PA. 1440 HOLLYWOOD BLVD SUITE 418 HOLLYWOOD FL 33021		Notice Type: APPROVAL NOTICE Class of Valid From 10/01/2011 to 09/30/2014 CONTRACTOR RATE	

## SUPPORTING DOCUMENTS

- EXHIBIT 1 Several press and media articles documenting the rise of South Beach as one of the United States' main fashion capitals.
- EXHIBIT 2 Press articles regarding the models and actresses who were both discovered by and careers were launched by the beneficiary, Jean Luc Brunel.
- EXHIBIT 3 Several articles regarding the prestigious reputation of Kann Models as formerly one of the world's leading agencies.
- EXHIBIT 4 A list of all of MC2's clients, including several high-profile campaigns featuring some of MC2's fashion models, as well as several press clippings regarding this prestigious and reputable modeling agency.
- EXHIBIT 5 The beneficiary's, Jean Luc Brunel, impressive curriculum vitae, verifying his tremendous accomplishments in both the fashion and modeling industries.
- EXHIBIT 6 Several articles regarding the 2004 Models New Generation Contest (including translations) as well as the beneficiary's leading role within this prestigious modeling event.
- EXHIBIT 7 Several press articles regarding the prestigious 2006 Models New Generation Competition (including translations), as well as the beneficiary's Jean Luc Brunel, leading role within the event.
- EXHIBIT 8 Letter of Claudia Midolo, President of Modelwork, a renowned modeling agency.
- EXHIBIT 9 Letter of Alla Amanova, Director of Figaro International Management.
- EXHIBIT 10 Several press articles reflecting the prestige and high circulation rates of the mentioned magazines and periodicals which have featured and covered the modeling events which the beneficiary, Jean Luc Brunel, has organized throughout the years.
- EXHIBIT 11 Information regarding the extremely successful and prestigious modeling and fashion association, International Model Talent Association (IMTA).
-



July 25, 2014

Department of Homeland Security  
United States Citizenship and Immigration Services  
Vermont Service Center  
30 Houghton Street  
Saint Albans, VT 05478

**RE: 1-129, Petition for a Nonimmigrant Worker  
O-1 Extraordinary Ability as an Art Director and Talent Coordinator  
Petitioner: MC2 Models Miami, LLC  
Beneficiary: Jean-Luc Didier Henri-Rene BRUNEL**

Dear Sir / Madam:

The present letter and its enclosures are submitted in support of the attached O-1 petition of MC2 Models Miami, LLC, on behalf of Mr. Jean Luc Brunel. The petition is based upon Mr. Brunel's standing as an "Alien of Extraordinary Ability in Art Direction and Talent Coordination." *Kindly note that Mr. Brunel currently holds O-1 status with our organization.*

The South Florida area and Miami Beach in particular have become a mecca for the fashion and modeling industries. As a result, many of the largest international modeling agencies such as Ford, Elite, and MC2 have opened offices in South Beach and the area has become one of the most important in the modeling industry. In fact, Miami Beach has become second only to New York City in terms of employment opportunities for fashion models in the United States. Attached as EXHIBIT 1, please find several press and media articles documenting the rise of South Beach as one of the United States' main fashion capitals.

In 1996, our company, MC2 (formerly Karin Models), established an office in the heart of the historic Art Deco District of Miami Beach. "South Beach" has truly become one of the world's modeling capitals and we are pleased to be a part of it. Our agency has developed a highly distinguished reputation in the modeling industry. We specialize in representing numerous models of international acclaim. Having discovered faces such as Christy Turlington, and molded the careers of celebrities such as Sharon Stone, Estella Warren, Mila

mc2 models miami • 1674 allton road • suite 500 • miami beach fl 33139  
305 672 8300 • fax [REDACTED] • administration 305 672 7672 • fax 305 672 6342  
mc2mm.com

Jovovich, Jerry Hall and Rebecca Romijn, who is currently starring in the award-winning ABC television series, *Ugly Betty*; MC2 models are among the most sought after in the industry, as evidenced by the caliber of their commercial and editorial bookings. Many of our fashion models have graced the pages of leading fashion magazines of the United States, Europe, Latin America, Africa, and Australia such as *Vogue*, *Teen Vogue*, *Elle*, *W*, *Glamour*, *V*, *Marie Claire*, *Surface* and *Cosmopolitan* as well as many more throughout the world. In addition to our Miami Beach office, MC2 Models has offices in New York City and Tel Aviv, Israel.

As Artistic Director and Talent Coordinator for MC2 Models Miami, LLC, Mr. Brunel will be responsible for overseeing the artistic aspects of the agency. By overseeing the art department in the agency, Mr. Brunel will direct the visual marketing of the models to clients, focusing on the images placed on both the model's composite cards and their portfolios. Both of these marketing tools are crucial in marketing fashion models to their appropriate catalog, editorial, or media clients. As Artistic Director and Talent Coordinator, Mr. Brunel will also coordinate the pairing of fashion models with a particular photographer. Clients for the agency include a myriad of fashion publications, retail stores, consumer product companies, and fashion houses to name but a few. Recruitment of talented artistic photographers who have an excellent understanding of the "ins and outs" of the modeling and fashion industry is critical to the successful running of a top-modeling agency such as MC2 Models. Mr. Brunel will also continue with his amazing track record of discovering the world's greatest talents and beauties in order to sign them with MC2 Models. Mr. Brunel will continue to travel around the world looking for new talents, and to agencies around the world in order to establish relationships with those agencies and allow MC2 Models Miami, LLC to represent them in the United States.

Mr. Brunel's impressive qualifications as an Art Director and Talent Coordinator, establish eligibility as to the regulatory standards for such classification as a top professional in his field. Mr. Brunel meets the O-1 criteria as an individual of extraordinary ability in the Arts and Entertainment field as well as a business entrepreneur. MC2 Models Miami, LLC is presently seeking a sophisticated art director and talent coordinator. After reviewing his experience and accolades, we are confident that the beneficiary, Mr. Jean Luc Brunel, will perform said function with outstanding skill and professionalism.

#### **I. MR. BRUNEL'S QUALIFICATIONS AS THE BENEFICIARY**

In addition to Jean Luc Brunel's extensive business qualifications, his career as an individual with artistic vision and creative talents qualifies him as an O-1 alien in the Arts and Entertainment Field. His all-encompassing experience as an Art Director, Talent Coordinator, international entrepreneur and business

leader in the modeling, fashion, entertainment, public relations, restaurant, and tourism industries has made Mr. Brunel internationally renowned in those fields. Among his various accomplishments throughout his career are the successful modeling agencies he has founded both in Europe and in the United States. For example, in 1978, Mr. Brunel founded and grew Karin Models Paris from the ground up to become a lead-market agency with a world-wide presence. Capturing a strong market share in Paris, Mr. Brunel successfully created Karin Models as a platform for marquee clients to obtain sophisticated public relations services and important modeling contract opportunities. Mr. Brunel's success was so great with Karin Paris that in the next ten years, he founded Next Model Management in Los Angeles, California in 1980, Next Model Management in Miami, Florida in 1982, Model Management Group also in Miami, Florida in 1986, and Rebecca Commercial Casting in New York City, in 1988. The latter one was opened as a talent and casting agency for performers, offering services such as voice-overs, television, and cinema advertising work, again, successfully carving out a niche by which to make his mark and achieve bold commercial performance results.

Although Mr. Brunel later sold his rights to Next Management to Faith Kates in 1989, who partnered with Joel Wilkenfeld a couple of years later; NEXT represents some of the most prestigious women and men in the fashion world today. Star talent includes renowned fashion models Molly Sims, Daniela Pestova, Audrey Quock, Yamila Diaz, and Malgosia Bela. NEXT continues to maintain an influential international force in the fashion and modeling industry through its fully operational offices in New York, Los Angeles, Miami, Sao Paulo, Montreal, London, and Paris, as well as its affiliates in Milan and Australia.

Because of strong revenue growth and successful business performance, as a result of his artistic vision as an artistic director and talent coordinator, Mr. Brunel founded the very successful Karin Models of America in New York City and Karin Models USA in Miami Beach. Mr. Brunel's commercial ventures in opening Karin agencies in Paris, New York, and Miami have been extremely successful, generating combined annual revenues of twenty five (25) million dollars. Eventually, Mr. Brunel licensed the Karin name to agencies in Israel, Denmark, Germany, and Spain. Mr. Brunel's extraordinary talents are not only limited to launching successful modeling businesses, but also in discovering and launching the careers of some of the world's most successful models. Mr. Brunel has launched the extremely successful careers of supermodels such as Christy Turlington, Rachel Hunter, Sharon Stone, Monica Bellucci, Estella Warren, and Christina Semonovskaya. These women all proceeded to become some of the most photographed international cover models in the world, appearing on thousands of magazine covers worldwide and spanning many years. As a result of his reputation as a highly visible, strategic networker who cultivates and conducts business in a global environment and brokers lucrative deals, many

top players in the fashion and entertainment field requested that Mr. Brunel function as their exclusive agent and representative. Some of these top former and present professional supermodels in the fashion field include, Naomi Campbell, Christy Turlington, Rebecca Romijn, Milla Jovanovich, Inez Sastre, Melanie Thierry, and Jerry Hall. Attached as EXHIBIT 2, please find press articles regarding the models and actresses who were both discovered by and careers were launched by the beneficiary, Jean Luc Brunel. Additionally, attached as EXHIBIT 3, please find several articles regarding the prestigious reputation of Karin Models as formerly one of the world's leading agencies.

Most recently in October 2005, and after his reign with Karin Models, Mr. Brunel launched the prestigious MC2 Model Management worldwide with offices in New York, Miami and Tel Aviv. Mr. Brunel started the high-profile MC2 Model Management in order to represent high fashion models in a boutique agency setting. MC2 Model Management is already being lauded by fashion insiders as "one of the hottest agencies in North America" as well as "prominently positioned to be one of the major players of the Zeros because of its insider relationships with the most influential photographers around." We invite you to visit [www.mc2mm.com](http://www.mc2mm.com) in order to view the high-caliber of models. MC2 represents some of its most recent successful bookings include Liu Dan's exclusive contract as the face of the Fall 2007 Guess Campaign and Sammy Jo's cover story for *Cosmopolitan Magazine*. Attached as EXHIBIT 4, please find a list of all of MC2's clients, including several high-profile campaigns featuring some of MC2's fashion models, as well as several press clippings regarding this prestigious and reputable modeling agency.

Jean Luc Brunel's entrepreneurial spirit is not only contained to the field of arts, beauty, and fashion. In 1970, as a result of his business insight, Mr. Brunel founded and grew Jean Luc Relations Publique, which specialized in press and promotions for tour operators and restaurants in France. During his work through Jean Luc Relations Publique, Mr. Brunel represented various key clients and collaborated on numerous prestigious events. Some of the prestigious events include: Air Tour and Daro Voyages. Jean Luc Relations Publique also promoted and marketed La Tour D'Argent, a three-star restaurant owned by Claude Terrail and, "The Go-Between", a motion picture by George Losey. Other projects taken on by Mr. Brunel through his public relations company was his work as product agent for Jean Claude Killy, 1968 Winter Olympic Gold Medalist skier, to promote Vail, Colorado in France for tourism potential and also directed all of the promotion for Finland's Ministry of Tourism. In 1975, Mr. Brunel further invested in the Food and Hospitality market by creating and developing "El Mono Desnudo"- a legendary, high-end bar on the Iberian Peninsula. This bar was known throughout the peninsula as extremely exclusive and attracted a celebrity clientele that included actress, Ursula Andress, and the Duchess D'Alba. Attached as EXHIBIT 5, please find the beneficiary's, Jean Luc Brunel,

impressive curriculum vitae, verifying his tremendous accomplishments in both the fashion and modeling industries.

## **II. ELIGIBILITY FOR CLASSIFICATION AS AN ALIEN OF EXTRAORDINARY ABILITY IN THE ARTS**

Under the Miscellaneous and Technical Immigration and Nationality Amendments of 1991, petitions for classification as an Alien of Extraordinary Ability in the Arts must be supported by evidence of "distinction". According to 8 CFR §214.2(o)(3)(ii), "distinction" means a high level of achievement in the field of arts as evidenced by a degree of skill and recognition substantially above that ordinarily encountered to the extent that a person described as prominent is renowned, leading, or well-known in the fields of arts. This evidence may consist of proof that the alien must be recognized as being prominent in his field of endeavor as demonstrated by the following according to 8 CFR §214.2(o)(3)(iv):

- A. Evidence that the alien has been nominated for or has been the recipient of significant national or international awards or prizes in the particular field such as an Academy Award, an Emmy, a Grammy, or a Director's Guild Award, or
- B. At least three of the following forms of documentation:
  - (1) Evidence that the alien has performed, and will perform, services as a lead or starting participant in productions or events, which have a distinguished reputation as evidenced by critical reviews, advertisements, publicity releases, publications contracts, or endorsements;
  - (2) Evidence that the alien has achieved national or international recognition for achievements evidenced by critical reviews or other published materials by or about the individual in major newspapers, trade journals, magazines, or other publications;
  - (3) Evidence that the alien has performed, and will perform, in a lead, starting, or critical role for organizations and establishments that have a distinguished reputation evidenced by articles in newspapers, trade journals, publications, or testimonials;
  - (4) Evidence that the alien has a record of major commercial or critically acclaimed successes as evidenced by such indicators as title, rating, standing in the field, box office receipts, motion picture or television ratings, and other occupational achievements reported in trade journals.

major newspapers, or other publications;

(5) Evidence that the alien has received significant recognition for achievements from organizations, critics, government agencies, or other recognized experts in the field in which the alien is engaged. Such testimonials must be in a form, which clearly indicates the author's authority, expertise, and knowledge of the alien's achievements; or

(6) Evidence that the alien has either commanded a high salary or will command a high salary or other substantial remuneration for services in relation to others in the field, as evidenced by contracts or other reliable evidence; or

- C. If the criteria in paragraph (o)(3)(iv) of this section do not readily apply to the beneficiary's occupation, the petitioner may submit comparable evidence in order to establish the beneficiary's eligibility.

**EVIDENCE THAT THE BENEFICIARY MEETS AT LEAST THREE OF THE PRONGS OF THE CRITERIA UNDER SUBSECTION B**

The first prong that the beneficiary satisfies is 8 CFR §214.2(o)(3)(iv)(B)(1), which requires evidence that the alien has performed, and will perform, services as a lead or starring participant in productions or events which have a distinguished reputation as evidenced by critical reviews, advertisements, publicity releases, publication contracts, or endorsements.

As a result of Mr. Brunel's combined expertise in fashion and tourism, he decided to create Latin Model Pageants, now known as Models New Generation, to cross promote these key industries with international business and investment opportunities. Mr. Brunel has promoted and judged various modeling contests throughout South America including modeling contests staged in countries such as Peru, Ecuador, Brazil, Argentina, and Chile. Conceived in 1987, the Latin Model of the World event was a high-end modeling and entertainment product that appealed to upscale international audiences, reaching nearly 400-million television viewers worldwide. Throughout his history as a major international event promoter and artistic and talent coordinator, Mr. Brunel has orchestrated multi-faceted public relations, advertising and media campaigns that incorporated television, magazines, programs, newsletters, and promotions, becoming notably lucrative for various major brands as a promotional tool. Mr. Brunel's acute knowledge of marketing and promoting skills has turned his various international events into highly successful artistic and business ventures for various major brands. Latin Model Pageants attracted major brands as

sponsors, such as American Airlines, Ray-Ban, Coca-Cola, Proctor & Gamble, and Revlon.

Mr. Brunel's has continued his ventures as both a promoter and panel judge when he founded and created the international modeling contest, Models New Generation that took place in Guayaquil, Ecuador in 2004. Mr. Brunel sat on a panel with three other professionals in the fashion industry and judged over forty-nine young women from over North and South America, Asia, and Europe. After ten days of harsh competition, Jean Luc Brunel crowned the winner, Alyne Weber, a fifteen year old from Brazil, whom as a result of coming in first place was awarded over three hundred thousand dollars worth of modeling contracts. The city of Guayaquil, Ecuador was also thrown into the international spotlight as the host city for the modeling contest. The Models New Generation was broadcasted on numerous television network channels including, Fashion TV, which transmits to over 202 countries throughout the globe, the entire Association of Television Channels in Ecuador, National Television of China, and Rede Globo, Brazil's largest and most popular television network. Attached as EXHIBIT 6, please find several articles regarding the 2004 Models New Generation Contest as well as the beneficiary's leading role within this prestigious modeling event.

As a result of the tremendous success of the first Models New Generation that took place in Guayaquil, Ecuador in 2004, Mr. Brunel organized the second Model New Generation Contest which was held in 2006 in the Ecuadorian capital of Quito. In order to select only the very best new models, several preliminary, qualifying shows were held in different countries of Latin America including Bolivia, Panama and Peru. The final contest was held in Quito, Ecuador at the historical Plaza San Francisco. Mr. Brunel sat on a panel with three other professionals in the fashion industry and judged over forty-eight young women from twenty-eight different countries from North and South America, Asia, and Europe. After ten days of harsh competition, Jean Luc Brunel crowned the winner, Ginta Lapina, an eighteen year-old, from Latvia, whom as a result of coming in first place was awarded over three hundred thousand dollars worth of modeling contracts.

The city of Quito, Ecuador was also thrown into the international spotlight as the host city for the modeling contest. Again, just like the immense media exposure given to the first Models New Generation competition of 2004, the 2006 Models New Generation competition was broadcast on numerous television network channels including, Fashion TV, which transmits to over 202 different countries throughout the globe, the entire Association of Television Channels in Ecuador, National Television of China, and Rede Globo, Brazil's largest and most popular television network. Attached as EXHIBIT 7, please find several press articles regarding the prestigious 2006 Models New Generation

Competition, as well as the beneficiary's Jean Luc Brunel, leading role within the event. The 2006 Models New Generation program was broadcast in over 202 countries throughout the world. Mr. Brunel has performed and will most definitely continue to perform services as a leading participant in modeling events, which have a distinguished reputation and will bring more public international light to MC2 Models.

For the above-mentioned reasons, Mr. Brunel satisfies INA §214.2(o)(3)(iv)(B)(1).

The second prong that the beneficiary satisfies is 8 CFR §214.2(o)(3)(iv)(B)(2), which requires evidence that the alien has achieved national or international recognition for achievements evidenced by critical reviews or other published materials by or about the individual in major newspapers, trade journals, magazines, or other publications.

Mr. Brunel holds an international reputation as a visible, strategic networker who is able to cultivate expert relationship management skills in order to conduct business in a global environment and broker lucrative deals. Mr. Brunel has a long history in marketing and advertising major fashion campaigns. Throughout his twenty-five year career in the fashion business, Mr. Brunel has developed worldwide exclusive modeling and cosmetic campaigns. Some of these major cosmetic campaigns include: Bio Therm with supermodel Elle McPherson; PHAS with Rebecca Romijn, Christian Dior with Christina Semonovskaya, Margret Astor with Monica Bellucci, Chanel with Patricia Von Rickenheim, Angel Perfume with Thierry Mugler, and Cacharel Perfume with Alda Balestra. Mr. Brunel has also developed major fashion campaigns and has developed campaigns and exclusive contracts with some of the world's top fashion designers such as Yves Saint Laurent, Chanel, Christian Dior, Gucci, Prada and Marc Jacobs. Please see the enclosed letter of Claudia Midolo, President of Modelwork, a renowned modeling agency. EXHIBIT 8.

As a talent coordinator, Mr. Brunel's success can and should also be measured with the successful careers the models, whose careers he launched, have achieved. As stated above, Mr. Brunel has discovered and represented various super models throughout his career. Christy Turlington, who was discovered by Mr. Brunel, has personified unaffected beauty, representing Calvin Klein's fragrances since 1987. Turlington, as well as another model represented by Mr. Brunel, Naomi Campbell, became one of the few supermodels, who managed to make an easy transition from the haute glamour of the 1980's to the relaxed simplicity of the following decade. Throughout her extensive career, and as a result of Mr. Brunel's "Fashion Savvy Eye", Christy Turlington has graced the cover of hundreds of fashion magazines, such as *Cosmopolitan*, *W*, *Vogue*, *Shape*, *Fitness*, *Elle*, *Bazaar*, *Marie Claire*, *Harper's*,

Esquire, and even *Time Magazine*. Please see the enclosed letter of Alla Amantova, Director of Figaro International Management. EXHIBIT 9.

In addition, the modeling events that Mr. Brunel has been organizing throughout the years receive not only national, but also international attention and appear in multiple publications around the world. One of the most recent events he organized, the Models New Generation contest, which took place in Ecuador was publicized and transmitted by various television networks and appeared on multiple newspapers and magazines, among them Globo Television Networks in Brazil, Fashion TV which is broadcast into 202 countries throughout the world, *El Universo*, *Cosas*, *La Razon*, *El Diario*, *El Telegrafo*, *Notinorte*, *Extra*, *Hoy*, *El Gran Guayaquil*, *El Comercio*, *Semana*, and *8 Lideres*, to name a few. These major publications have a large subscription rate which numbers in the many millions of readers. Attached as EXHIBIT 10, please find several press articles reflecting the prestige and high circulation rates of the above-mentioned magazines and periodicals which have featured and covered the modeling events in which the beneficiary, Jean Luc Brunel, has organized throughout the years.

Hence the beneficiary satisfies INA §214.2(o)(3)(iv)(B)(2) for having achieved not only national but also international recognition for achievements in the modeling industry, by having his work published in major newspapers and magazines throughout the world.

The third prong that the beneficiary satisfies is 8 CFR §214.2(o)(3)(iv)(B)(4), which requires evidence that the alien has a record of major commercial or critically acclaimed successes as evidenced by such indicators as title, rating, standing in the field, box office receipts, motion picture or television ratings, and other occupational achievements reported in trade journals, major newspapers, or other publications.

One of the main reasons that Mr. Brunel has been able to not only survive, but also be extremely successful in the ever-changing world of fashion is his ability to identify and recruit star-quality talent. As a result of his ability to scout major talents, Mr. Brunel was invited to become a member in one of the fashion industry's most elite and important associations, the International Model Talent Association (hereinafter IMTA). The IMTA is an international association of training centers for models and talent. IMTA gives aspiring models, actors, singers, and dancers spectacular opportunities to showcase their potential talents in front of top fashion and talent agents from the major markets of the international fashion industry. IMTA also provides its association members valuable marketing tips and networking events with agents and scouts from around the world. Several of today's up and coming actors and models have been discovered at

IMTA; some of these discoveries include world-renowned actors such as, Elijah Woods, Ashton Kutcher, Katie Holmes, Eva Longoria, Jessica Biel, and Sean William Scott. Attached as EXHIBIT 11, please find information regarding the extremely successful and prestigious modeling and fashion association, IMTA. Additionally, please find several pages from IMTA's official website documenting their discovery of the above-mentioned A-list actors and actresses, whose membership in IMTA proved to be the launching pad for very successful and highly profitable careers in the film industry.

Furthermore, as previously mentioned, Mr. Brunel has launched the successful careers of many internationally renowned models, who have been featured and still are in many international and national fashion magazines. In addition, his commercial ventures, especially MC2 Models, formerly Karin Models, have been extremely successful generating combined annual revenues of twenty five (25) million dollars. Currently MC2 is one of the most successful and well-known modeling agencies in the world. Mr. Brunel is one of few people in the modeling business that have achieved a similar standing and have been able to maintain it for over twenty-five years.

For the above-mentioned reasons, Mr. Brunel satisfies INA §214.2(o)(3)(iv)(B)(4).

#### **EVIDENCE THAT THE BENEFICIARY MEETS 8 CFR §214.2(O)(3)(IV)(C)**

The petitioner has submitted a plethora of evidence regarding Mr. Brunel's experience in the fashion modeling industry. Mr. Brunel's has established MC2 Models, formerly Karin Models, which is presently one of the major international modeling agencies, with combined annual revenues of twenty five million dollars. Only someone with Mr. Brunel's expertise and strong strive for success can achieve such international acclamation in the industry and been able to maintain his status for over twenty-five years. Mr. Brunel is the one responsible for the launch of numerous supermodels' careers, which have been maintained in the spotlight for several years. He has worked with renowned fashion designers and photographers, who have trusted his work and intuition. In addition, Mr. Brunel has orchestrated many international and national successful fashion events that have received international acclamation.

For the above-mentioned reasons, Mr. Brunel in addition to meeting at least three of the criteria of 8 CFR §214.2(O)(3)(iv)(B), he also qualifies under 8 CFR §214.2(O)(3)(iv)(C).

#### **III. CONCLUSION**

It is clear from the evidence that Mr. Brunel is eligible for classification as an Alien of Extraordinary Ability in Art Direction and Talent Coordination based

upon his meeting the eligibility requirements under the Immigration and Naturalization Act 101(a)(15)(O)(i) and 8 CFR 214.2(o). Mr. Brunel's successful career proves that he is a prominent, leading, and well-known person in the field of arts. Mr. Brunel's extraordinary ability in the field of arts, in which he will continue to work in the United States, has been demonstrated by sustained national and international acclaim. Based on the foregoing, we respectfully request your kind consideration and favorable determination of this petition, in order to accord Mr. Brunel the classification as an Alien of Extraordinary Ability in Art Direction and Talent Coordination. *Again, kindly note that the beneficiary, Mr. Jean Luc Brunel, has held O-1 status in the past.*

Wherefore, for the above-stated reasons, we respectfully request your favorable adjudication of the O-1 nonimmigrant visa petition submitted by MC2 Models Miami, LLC on behalf of Mr. Brunel. If you should have any questions or require any additional documentation, please do not hesitate to contact our office.

Thank you very much for your kind attention regarding this matter.

Truly Yours,



STUDIO  
FASHION  
ARTISTS  
ACTORS

Milan, September 17<sup>th</sup>, 2014

USCIS  
Vermont Service Center  
75 Lower Welden Street  
St. Albans, VT 05479-0001

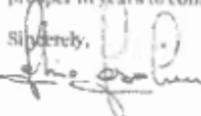
RE: O-1 Non-immigrant Visa Petition on behalf of Jean Luc Didier  
Henri-Rene Brunel

I write this letter in strong support of Mr. Jean Luc Brunel's application for a non-immigrant visa to this country. I am currently Administrator of Unico in Studio Fp. I have been asked to review the professional credentials of Mr. Brunel, and it is my professional opinion that Mr. Brunel is an Art Director and Talent Coordinator of extraordinary ability who ranks among the small percentage of foreign people at very top of his field.

I have seen first-hand Mr. Jean Luc's special expertise in the field, including casting, production, coordination, and art direction for shoots. Mr. Brunel is considered by those in our industry to be an extraordinary creative director talent, particularly for the fashion and related industries. In my personal dealings with Mr. Jean Luc Brunel, I found him to be thoroughly professional and capable of being utilized in connection with a wide range of creative subject matter on any assignment. He has the intuitive ability to provide just what's needed in connection with any particular creative process and possesses excellent artistic management and operational skills that come from his years of experience.

Many people do not understand that behind every successful advertising campaign and fashion shoot there are creative men and women who are making sure that the business operates efficiently by coordinating different tasks between models, photographers, and managing creative teams. I can honestly say that Mr. Brunel continuously proves himself as an extraordinary talent in his field.

I offer an unmitigated endorsement for Mr. Jean Luc Brunel regarding his visa application as a person of extraordinary ability. There is no doubt in my mind that his popularity and ability in the field will only continue to prosper in years to come.

Sincerely,  


27-28 Corso Via Sallustiana, 00187  
Rome, Italy



9/16/14

USCIS  
Visa Service Center

RE: O-1 Non-immigrant Visa Petition on behalf of Jean Luc Brunel

Dear Sir or Madam:

I write this letter in strong support of Mr. Jean Luc Brunel's application for a non-immigrant visa to this country. I am currently working as an Agent of Two Management in Los Angeles. Based upon my standing in the field of the fashion industry, I am frequently called to evaluate the credentials of other professionals in the field. I have been asked to review the professional credentials of Mr. Jean Luc Brunel. It is my professional opinion, based upon my personal and professional knowledge of Mr. Brunel's talents, that Mr. Brunel is an art director of extraordinary ability who ranks among the small percentage of foreign professionals at very top of his field.

I greatly admire Jean Luc Brunel and find it a pleasure to work with such a talented person. Judging by the high profile success of the companies with which he regularly works, clearly I am not the only one who appreciates his talent. His models have appeared in any of the world's most popular publications, reaching literally millions of admirers. He is particularly famous for his work in fashion, advertising and editorial world. His contribution to major clients, such as Calvin Klein, Gucci, Christian Dior have secured him a position as one of the leading high fashion art directors working today. Jean Luc Brunel is the consummate professional when it comes to the art of fashion and his work is often displayed in world's most elite magazines. A true artist, he is committed to the satisfaction of the client on every occasion. Although Mr. Brunel commands the highest compensation for his work, he is well worth the cost.

Mr. Jean Luc Brunel is unquestionably an individual of extraordinary talent, energy, international achievement and acknowledgment. Should you have any questions regarding Mr. Brunel's extraordinary ability, please feel free to contact me.

Thank you for your attention and consideration.

Sincerely,  
  
Luc Brunel

**OREOKADELSTUDIOS**

890 Broadway 2nd floor new york 10012 | 212.219.9374  
info@OREOKADELSTUDIOS.com

September 18, 2014

USCIS

Visa and Border Center

RE: O-1 Non-Immigrant Visa Petition on behalf of Jean Luc Brunel

Dear Sir or Madam:

This letter is written to support the visa application of Jean Luc Brunel so that he may be accorded O-1 extraordinary ability visa status to continue to expand upon his already outstanding success in the worldwide fashion industry. I am the Production Manager at Greg Kadal Studios, and have worked with such clients as *Vogue Italia*, *Numero*, *Interview*, *Vogue Germany*, *InStyle* and *Allure*.

Jean Luc Brunel has become increasingly well known in our field as someone who will infallibly manage and direct fashion models for clients, photographers, etc. Mr. Jean Luc Brunel has a trained eye to select the most appropriate models to be used in an advertising campaign, and subsequently has the outstanding ability to manage all stages of the complex process of producing the right model for a job. Therefore, the quality of his work is incredible as he is able to find the most beautiful models. As a result, he is fast becoming one of the professionals of choice for the fashion industry and other creative industries.

In my opinion, Jean Luc Brunel, is clearly an individual of extraordinary ability in the field of art, and the position he will assume in the United States clearly requires an individual of extraordinary ability in this field. Mr. Brunel has been internationally known and recognized for his unique talent and expertise, the models he finds regularly appearing in the most prestigious fashion publications around the world such as *Elle Magazine*, *Cosmopolitan*, *Macy's*, *Nordstrom*. Mr. Brunel's contributions to major clients have secured him a position as one of the leading directors and talent coordinators working today. It is also my opinion that the responsibilities and duties of an international art director, who collaborates with the most distinguished magazines and advertising clients, require an individual of extraordinary ability and accomplishments such as Mr. Jean Luc Brunel.

If granted an O-1 visa to work in the United States, Jean Luc Brunel will surely bring his phenomenal talent to the American market.

Please do not hesitate to contact me with any questions.

Sincerely,



Eric Gualdon  
Production Manager

montage

USCIS

Vermont Service Center  
75 Lower Welden Street  
St. Albans, VT 05479-0001

RE: O-1 Non-Immigrant Visa Petition on behalf of Jean Luc Brunel

Dear Sir or Madam:

My name is Nadia Canova and I am President of Montage Models. I have 30 years of experience and I am constantly in contact with professionals all over the world. A few of my clients include Elle Magazine, Simons, Reitmans, Laura Shop, Ogilvy's, The Bay Stores, and so on. As such, I am qualified to comment on Mr. Jean Luc Brunel's career as an art director of extraordinary ability.

It is not only because of his acclamations or his impressive body of work that fashion advertising and publishing executives around the world choose to utilize Mr. Brunel's great talent for their renowned accounts. Mr. Jean Luc Brunel is also an absolute expert at furnishing his clients with exactly the image of their desire. My personal appreciation of Mr. Brunel makes it easy for me to comprehend his acclamations. From my standpoint, they are certainly well confirmed. Accordingly, Mr. Brunel is in a position to command sizable compensation for his work as compares to others in the business.

Mr. Brunel's reputation as a formidable artist with a personable demeanor precedes him. He is constantly researching and developing stimulatingly new concepts for his clients and I have come to rely on and trust him and his ability. Over the course of his celebrated career, Jean Luc Brunel has distinguished himself as one of the leading fashion art directors in the industry.

Mr. Jean Luc Brunel enjoys an extraordinary relationship to the aesthetic. This quality manifests itself through the beautiful work he creates, time after time. Therefore, Jean Luc Brunel is clearly one of the most talented professionals working in the world today. I look forward to seeing more of his work in the future.

Sincerely Yours,



Nadia Canova  
montage

# NORDSTROM

September 17, 2014

USCIS  
Vermont Service Center  
75 Lower Welden Street  
St. Albans, VT 05479-0001

RE: O-1 Non-immigrant Visa Petition on behalf of Jean Luc Brunel

Dear Sir or Madam:

I would like to extend my full and unqualified support for the extraordinary ability O-1 visa petition submitted by Mr. Jean Luc Brunel. As the Senior Talent Producer for Nordstrom, I am qualified to say that Mr. Jean Luc Brunel is an art director and talent coordinator of the highest caliber whose technical excellence and creative vision have lifted him to the top of his profession.

Throughout Mr. Jean Luc Brunel's distinguished career, he has received a highly impressive list of professional honors and achievements. In the past few years, Mr. Brunel has sculpted beautiful models that have appeared in a list of acclaimed projects in some of the most eminent publications in the world, which serves as a testament to his talents.

I am a constant witness to the creative and operational skills of many creative direction people, including art directors and talent coordinators. It is therefore my pleasure to recognize the remarkable talent and achievements of Mr. Jean Luc Brunel. He manages to achieve the strongest results from the most carefully developed creative concepts and ideas. It is his very unique ability to communicate, via careful analysis, the intended creative message of his clients. It is clear that Mr. Jean Luc Brunel is talented far beyond the average levels for this industry by the stunning merit with which his work is considered. Indeed, he has worked with some of the best-known retailers, fashion houses, and magazines in the world. It is without a doubt that I place him in the ranks of the very best in his profession.

I can confidently testify that Mr. Jean Luc Brunel's reputation has achieved international stature. He has reached a level where industry leaders now describe him as a "star". Jean Luc Brunel's extraordinary career is at a point where there is no turning back.

Sincerely,



Liza Marlow  
Senior Talent Producer  
Nordstrom

Nordstrom, Inc.  
200 S. Michigan St., Seattle, WA 98101  
Nordstrom.com

Recommendation Letter

22/09/14

USCIS  
Vermont Service Center  
75 Lower Welden Street  
St. Albans, VT 05479-0001

RE: O-1 Non-immigrant Visa Petition on behalf of Jean Luc Brunel

Dear Sir or Madam:

It is an extreme pleasure to write a letter of recommendation for Mr. Jean Luc Brunel. I provide this recommendation based on my knowledge and experience in the field of modeling, due to my established reputation and work in the field as the Vladimir Yudashkin, director of 1 Mother Agency, Kiev, Ukraine

I have known Jean Luc Brunel professionally for several years through our work together and, in my opinion, he is an extremely talented individual with superb professional reputation. He is an extraordinarily able coordinator who strives for and attains a level of merit in his work that only a few of his contemporaries meet. He has the ability to recognize the creative vision of his client within the time and budget through his careful and thoughtful choice of model casting combined with his meticulous ability in the field. Jean Luc Brunel is a true find in our industry.

There are plenty of art directors out there, but none with the depth and quality that Mr. Brunel possesses. He is unlike anyone in this industry, and I expect to see him continue to find great models in his successful career. Someone overflowing with talent as Jean Luc Brunel should be given every opportunity to work in the United States, where he will have the proper venues to showcase his extraordinary talents.

Please do not hesitate to contact me should you have any questions regarding this matter. Thank you for your time and consideration.

Sincerely,

Vladimir Yudashkin



# FIGARO

THE JOURNAL OF STYLING MODELS

1100 BROADWAY, SUITE 2000  
NEW YORK, NY 10018

Number [REDACTED]  
June 17, 2014

Department of Homeland Security  
United States Citizenship and Immigration Services  
Vermont Service Center  
30 Houghton Street  
Saint Albans, VT 05478

Dear Sirs,

**Re: O-1 Extraordinary Ability as an Art Director and Talent Coordinator on behalf of  
Jean-Luc Didier Henri-Rene Brunel**

I wish the opportunity to write this letter in support of Mr. Jean-Luc Brunel's petition to work as an Art Director and Talent Coordinator in the United States.

As a talent coordinator, Mr. Brunel's success can and should be measured with the successful careers the models, whose careers he launched, have achieved. Mr. Brunel has discovered and represented various super models throughout his career. Christy Turlington, who was discovered by Mr. Brunel, has personified unaffected beauty, representing Calvin Klein's fragrances since 1987. Turlington, as well as another model represented by Mr. Brunel, Naomi Campbell, became one of the few supermodels, who managed to make an easy transition from the haute glamour of the 1980's to the relaxed simplicity of the following decade. Throughout her extensive career and as a result of Mr. Brunel's "Fashion Savvy Eye", Christy Turlington has graced the cover of hundreds of fashion magazines, such as Cosmopolitan, W, Vogue, Shape, Fitness, Elle, Bazaar, Marie Claire, Harper's Bazaar, and even Time Magazine.

Mr. Brunel has also launched the extremely successful careers of supermodels such as Rachel Hunter, Sharon Stone, Monica Bellucci, Estela Warren, and Christina Semakova. These women all proceeded to become some of the most photographed international cover models in the world, appearing on thousands of magazine covers worldwide and spanning many years. As a result of his reputation as a highly visible, strategic networker who cultivates and conducts business in a good environment and brokes lucrative deals, many top players in the fashion and entertainment field requested that Mr. Brunel function as their exclusive agent and representative.

We have had more than gratifying experience working with Mr. Jean-Luc Brunel, coordinating big fashion events and the opportunity for him to find top new talents to represent in the United States through our agency.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Alex Arantova  
Director

FIGARO INTERNATIONAL, INC.

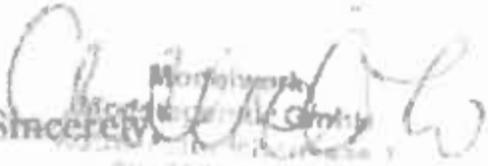
1100 BROADWAY, SUITE 2000  
NEW YORK, NY 10018  
TEL: 212 692 1234



Yves Saint Laurent, Chanel, Christian Dior, Gucci, Prada, and Marc Jacobs.

In addition to Mr. Jean Luc Brunel's extensive business qualifications, his career as an individual with artistic vision and creative talents has helped him find top fashion models to represent in the United States.

Should you have any questions about Mr. Jean Luc Brunel qualifications feel free to contact me.

  
Sincerely,

**Claudia Midolo**  
President  
Modelwerk Modelagentur GmbH



July 8, 2014

Department of Homeland Security  
United States Citizenship and Immigration Services  
Vermont Service Center  
30 Houghton Street  
Saint Albans, VT 05478

Re: O-1 Extraordinary Ability as an Art Director and Talent Coordinator on behalf of Jean-Luc Didier Henri-Rene Brunel

To Whom It May Concern:

As a President of Natalie Model Management, the letter is submitted in support of MC2 Models Miami, LLC, on behalf of Mr. Jean-Luc Brunel to work as an Art Director and Talent Coordinator.

Mr. Brunel holds an international reputation as a visible, strategic networker who is able to cultivate expert relationship management skills in order to conduct business in a global environment and broker lucrative deals. Mr. Brunel has a long history in marketing and advertising major fashion campaigns. Throughout his twenty-five year career in the fashion business, Mr. Brunel has developed worldwide, exclusive modeling and cosmetic campaigns. Some of these major cosmetic campaigns include: Bio Therm with supermodel Elle McPherson, PHAS with Rebecca Romijn, Christian Dior with Christina Semonovskaya, Margret Astor with Monica Bellucci, Chanel with Patricia Von Bülow, Angel Perfume with Thierry Mugler, and Cacharel Perfume with Alda Balestra. Mr. Brunel has also developed major fashion campaigns and has developed campaigns and exclusive contracts with some of the world's top fashion designers such as Yves Saint Laurent, Chanel, Christian Dior, Gucci, Prada, and Marc Jacobs.

---

Es "Agentura NATALIE" Gertrudis iela 27/2, Rīga, LV 1011, Latvija  
Tālrunis: +371 781 2194, fakss: +371 781 2438, e-pasts: natalie@opole.lv, www.natliemodels.com  
Reģ. Nr. LV90003326241, A/S PARĒKŠS BANKA, kodds PARUV22, konts LV36 PARX 0000 8101 9

EFTA01122334

In addition to Mr. Jean Luc Brunel's extensive business qualifications, his career as an individual with artistic vision and creative talents has helped him find top fashion models to represent in the United States.

Should you have any questions about Mr. Jean Luc Brunel's qualifications, feel free to contact me.

Sincerely,



Erik Mathans



Studio  
Milano  
Via  
10121

Milan, September 1<sup>st</sup>, 2014

USCIS  
Vermont Service Center  
75 Lower Welden Street  
St. Albans, VT 05479-0001

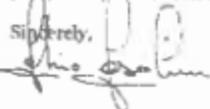
RE: O-1 Non-immigrant Visa Petition on behalf of Jean Luc Didier  
Henri-Rene Brunel

I write this letter in strong support of Mr. Jean Luc Brunel's application for a non-immigrant visa to this country. I am currently Administrator Unico in Studio Fp. I have been asked to review the professional credentials of Mr. Brunel, and it is my professional opinion that Mr. Brunel is an Art Director and Talent Coordinator of extraordinary ability who ranks among the small percentage of foreign people at very top of his field.

I have seen first-hand Mr. Jean Luc's special expertise in the field, including casting, production, coordination, and art direction for shoots. Mr. Brunel is considered by those in our industry to be an extraordinary creative director talent, particularly for the fashion and related industries. In my personal dealings with Mr. Jean Luc Brunel, I found him to be thoroughly professional and capable of being utilized in connection with a wide range of creative subject matter on any assignment. He has the intuitive ability to provide just what's needed in connection with any particular creative process and possesses excellent artistic management and operational skills that come from his years of experience.

Many people do not understand that behind every successful advertising campaign and fashion shoot there are creative men and women who are making sure that the business operates efficiently by coordinating different tasks between models, photographers, and managing creative teams. I can honestly say that Mr. Brunel continuously proves himself as an extraordinary talent in his field.

I offer an unmitigated endorsement for Mr. Jean Luc Brunel regarding his visa application as a person of extraordinary ability. There is no doubt in my mind that his popularity and ability in the field will only continue to prosper in years to come.

Sincerely,  


10121 Milano, Via Catherine, 10121  
www.studiofp.com



9/16/14

USCIS  
Vermont Service Center  
75 Lower Welden Street  
St. Albans, VT 05479-0001

RE: O-1 Non-immigrant Visa Petition on behalf of Jean Luc Brunel

Dear Sir or Madam:

I write this letter in strong support of Mr. Jean Luc Brunel's application for a non-immigrant visa to this country. I am currently working as an Agent at Two Management in Los Angeles. Based upon my standing in the field of the fashion industry I am frequently called to evaluate the credentials of other professionals in the field. I have been asked to review the professional credentials of Mr. Jean Luc Brunel. It is my professional opinion, based upon my personal and professional knowledge of Mr. Brunel's talents, that Mr. Brunel is an art director of extraordinary ability who ranks among the small percentage of foreign professionals at very top of his field.

I greatly admire Jean Luc Brunel and find it a pleasure to work with such a talented person. Judging by the high profile success of the companies with which he regularly works, clearly I am not the only one who appreciates his talent. His models have appeared in many of the world's most popular publications, reaching literally millions of admirers. He is particularly famous for his work in fashion, advertising and editorial world. His contribution to major clients, such as Calvin Klein, Gucci, Christian Dior have secured him a position as one of the leading high fashion art directors working today. Jean Luc Brunel is the consummate professional when it comes to the art of fashion and his work is often displayed in world's most elite magazines. A true artist, he is committed to the satisfaction of the client on every occasion. Although Mr. Brunel commands the highest compensation for his work, he is well worth the cost.

Mr. Jean Luc Brunel is unquestionably an individual of extraordinary talent, energy, international achievement and acknowledgment. Should you have any questions regarding Mr. Brunel's extraordinary ability, please feel free to contact me.

Thank you for your attention and consideration.

  
\_\_\_\_\_  
[Name]

**GREOKADELSTUDIOS**

880 Broadway 2nd floor new york 10013 212.218.8274  
info@GREOKADELSTUDIOS.com

September 15, 2014

USCIS

Vermont Service Center  
75 Lower Welden Street  
St. Albans, VT 05470-0001

RE: O-1 Non-Immigrant Visa Petition on behalf of Jean Luc Brunel

Dear Sir or Madam:

This letter is written to support the visa application of Jean Luc Brunel so that he may be accorded O-1 extraordinary ability visa status to continue to expand upon his already outstanding success in the worldwide fashion industry. I am the Production Manager at Greg Kadel Studios, and have worked with such clients as *Vogue Italia*, *Numero*, *Interview*, *Vogue Germany*, *InStyle*, and *Allure*.

Jean Luc Brunel has become increasingly well known in our field as someone who will infallibly manage and direct fashion models for clients, photographers, etc. Mr. Jean Luc Brunel has a trained eye to select the most appropriate models to be used in an advertising campaign, and subsequently has the outstanding ability to manage all stages of the complex process of producing the right model for a job. Therefore, the quality of his work is incredible as he is able to find the most beautiful models. As a result, he is fast becoming one of the professionals of choice for the fashion industry and other creative industries.

In my opinion, Jean Luc Brunel, is clearly an individual of extraordinary ability in the field of art, and the position he will assume in the United States clearly requires an individual of extraordinary ability in this field. Mr. Brunel has been internationally known and recognized for his unique talent and expertise, the models he finds regularly appearing in the most prestigious fashion publications around the world such as *Elle Magazine*, *Consignation*, *Mary's*, *Noordstrom*. Mr. Brunel's contributions to major clients have secured him a position as one of the leading directors and talent coordinators working today. It is also my opinion that the responsibilities and duties of an international art director, who collaborates with the most distinguished magazines and advertising clients, require an individual of extraordinary ability and accomplishments such as Mr. Jean Luc Brunel.

If granted an O-1 visa to work in the United States, Jean Luc Brunel will surely bring his phenomenal talent to the American market.

Please do not hesitate to contact me with any questions.

Sincerely,



Ernesto Quijano  
Production Manager

**montage**

3451 ST LAURENT #409, MONTREAL, QC TEL: 514 284-9951 FAX: 514 284-3656

**USCIS**

**Vermont Service Center  
75 Lower Welden Street  
St. Albans, VT 05479-0001**

**RE: O-1 Non-Immigrant Visa Petition on behalf of Jean Luc Brunel**

**Dear Sir or Madam:**

My name is Nadia Canova and I am President of Montage Models. I have 30 years of experience and I am constantly in contact with professionals all over the world. A few of my clients include Elle Magazine, Simons, Raitmans, Laura Shop, Ogilvy's, The Bay Stores.....and so on. As such, I am qualified to comment on Mr. Jean Luc Brunel's career as an art director of extraordinary ability.

It is not only because of his acclamations or his impressive body of work that fashion advertising and publishing executives around the world choose to utilize Mr. Brunel's great talent for their renowned accounts. Mr. Jean Luc Brunel is also an absolute expert at furnishing his clients with exactly the image of their desire. My personal appreciation of Mr. Brunel makes it easy for me to comprehend his acclamations. From my standpoint, they are certainly well confirmed. Accordingly, Mr. Brunel is in a position to command sizable compensation for his work as compares to others in the business.

Mr. Brunel's reputation as a formidable artist with a personable demeanor precedes him. He is constantly researching and developing stimulatingly new concepts for his clients and I have come to rely on and trust him and his ability. Over the course of his celebrated career, Jean Luc Brunel has distinguished himself as one of the leading fashion art directors in the industry.

Mr. Jean Luc Brunel enjoys an extraordinary relationship to the aesthetic. This quality manifests itself through the beautiful work he creates, time after time. Therefore, Jean Luc Brunel is clearly one of the most talented professionals working in the world today. I look forward to seeing more of his work in the future.

**Sincerely Yours,**



**Nadia Canova  
montage**

# NORDSTROM

September 17, 2014

USCIS  
Vermont Service Center  
75 Lower Welden Street  
St. Albans, VT 05479-0001

RE: O-1 Non-immigrant Visa Petition on behalf of Jean Luc Brunel

Dear Sir or Madam:

I would like to extend my full and unqualified support for the extraordinary ability O-1 visa petition submitted by Mr. Jean Luc Brunel. As the Senior Talent Producer for Nordstrom, I am qualified to say that Mr. Jean Luc Brunel is an art director and talent coordinator of the highest caliber whose technical excellence and creative vision have lifted him to the top of his profession.

Throughout Mr. Jean Luc Brunel's distinguished career, he has received a highly impressive list of professional honors and achievements. In the past few years, Mr. Brunel has executed beautiful models that have appeared in a list of acclaimed projects in some of the most eminent publications in the world, which serves as a testament to his talents.

I am a constant witness to the creative and operational skills of many creative direction people, including art directors and talent coordinators. It is therefore my pleasure to recognize the remarkable talent and achievements of Mr. Jean Luc Brunel. He manages to achieve the strongest results from the most carefully developed creative concepts and ideas. It is his very unique ability to communicate, via careful analysis, the intended creative message of his clients. It is clear that Mr. Jean Luc Brunel is talented far beyond the average levels for this industry by the stunning merit with which his work is considered. Indeed, he has worked with some of the best-known retailers, fashion houses, and magazines in the world. It is without a doubt that I place him in the ranks of the very best in his profession.

I can confidently testify that Mr. Jean Luc Brunel's reputation has achieved international status. He has reached a level where industry leaders now describe him as a "star". Jean Luc Brunel's extraordinary career is at a point where there is no turning back.

Sincerely,



Liza Mastor  
Senior Talent Producer  
Nordstrom

Nordstrom Inc.  
2005 Michigan St, Seattle, WA 98108  
Nordstrom.com

Recommendation Letter

22/09/14

USCIS  
Vermont Service Center  
75 Lower Welden Street  
St. Albans, VT 05479-0001

RE: O-1 Non-immigrant Visa Petition on behalf of Jean Luc Brunel

Dear Sir or Madam:

It is an extreme pleasure to write a letter of recommendation for Mr. Jean Luc Brunel. I provide this recommendation based on my knowledge and experience in the field of modeling, due to my established reputation and work in the field as the Vladimir Yudashkin, director of 1 Mother Agency, Kiev, Ukraine

I have known Jean Luc Brunel professionally for several years through our work together and, in my opinion, he is an extremely talented individual with superb professional reputation. He is an extraordinarily able coordinator who strives for and attains a level of merit in his work that only a few of his contemporaries meet. He has the ability to recognize the creative vision of his client within the time and budget through his careful and thoughtful choice of model casting combined with his meticulous ability in the field. Jean Luc Brunel is a true find in our industry.

There are plenty of art directors out there, but none with the depth and quality that Mr. Brunel possesses. He is unlike anyone in this industry, and I expect to see him continue to find great models in his successful career. Someone overflowing with talent as Jean Luc Brunel should be given every opportunity to work in the United States, where he will have the proper venues to showcase his extraordinary talents.

Please do not hesitate to contact me should you have any questions regarding this matter. Thank you for your time and consideration.

Sincerely,

Vladimir Yudashkin



**FIGARO**  
THE GENIUS OF STYLED MODELS



Number: 0617401  
June 17, 2014

Department of Homeland Security  
United States Citizenship and Immigration Services  
Vermont Service Center  
30 Houghton Street  
Saint Albans, VT 05478

Dear Sirs:

**Re: O-1 Extraordinary Ability as an Art Director and Talent Coordinator on behalf of  
Jean-Luc Didier Henri-Rene Brunel**

I reish the opportunity to write this letter in support of Mr. Jean-Luc Brunel petition to work as an Art Director and Talent Coordinator in the United States.

As a talent coordinator, Mr. Brunel's success can and should be measured with the successful careers the models whose careers he launched have achieved. Mr. Brunel has discovered and represented various super models throughout his career. Christy Turlington, who was discovered by Mr. Brunel, has paratified unaffected beauty, representing Calvin Klein's fragrances since 1987. Turlington, as well as another model represented by Mr. Brunel, Naomi Campbell, became one of the few supermodels, who managed to make an easy transition from the haute glamour of the 1980's to the relaxed simplicity of the following decade. Throughout her extensive career and as a result of Mr. Brunel's "Kashvan-Sayvi Eye", Christy Turlington has graced the covers of hundreds of fashion magazines, such as Cosmopolitan, W, Vogue, Shape, Fitness, Elle, Bazaar, Marie Claire, Harper's, Esquire, and even Time Magazine.

Mr. Brunel has also launched the extremely successful careers of supermodels such as Rachel Hunter, Sharon Stone, Monica Belucci, Estelle Warren, and Christina Semannovskaya. These women all proceeded to become some of the most photographed international cover models in the world, appearing on thousands of Magazine covers worldwide and spanning many years. As a result of his reputation as a highly visible, strategic networker who cultivates and conducts business in a global environment and brokers lucrative deals, many top players in the fashion and entertainment field requested that Mr. Brunel function as their exclusive agent and representative.

We have had more than gratifying experience working with Mr. Jean-Luc Brunel, coordinating big fashion events and the opportunity for him to find top new talents to represent in the United States through our agency.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Aida Amantova  
Director

FIGARO INTERNATIONAL INC.

2014-06-17

# MODELWERK



Hamburg 8 July, 2014

Department of Homeland Security  
United States Citizenship and Immigration Services  
Vermont Service Center  
30 Houghton Street  
Saint Albans, VT 05478

**Re: O-1 Extraordinary Ability as an Art Director and Talent Coordinator on behalf of Jean-Luc Didier Henri-Rene Brunel**

**To Whom It May Concern:**

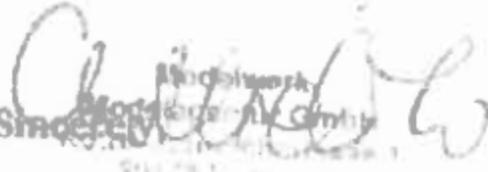
As a President of Modelwerk, this letter is submitted in support of MC2 Models Miami, LLC, on behalf of Mr. Jean-Luc Brunel to work as an Art Director and Talent Coordinator.

Mr. Brunel holds an international reputation as a visible, strategic networker who is able to cultivate expert relationship management skills in order to conduct business in a global environment and broker lucrative deals. Mr. Brunel has a long history in marketing and advertising major fashion campaigns. Throughout his twenty-five year career in the fashion business, Mr. Brunel has developed worldwide, exclusive modeling and cosmetic campaigns. Some of these major cosmetic campaigns include: Bio Therm with supermodel Elle McPherson, PHAS with Rebecca Romijn, Christian Dior with Christina Semonovskaya, Margret Astor with Monica Bellucci, Chanel with Patricia Von Rickenheim, Angel Perfume with Thierry Mugler, and Cacharel Perfume with Alda Ballestra. Mr. Brunel has also developed major fashion campaigns and has developed campaigns and exclusive contracts with some of the world's top fashion designers such as

Yves Saint Laurent, Chanel, Christian Dior, Gucci, Prada, and Marc Jacobs.

In addition to Mr. Jean Luc Brunel's extensive business qualifications, his career as an individual with artistic vision and creative talents has helped him find top fashion models to represent in the United States.

Should you have any questions about Mr. Jean Luc Brunel qualifications feel free to contact me.



Modelwerk  
Modellingagentur GmbH  
Sindelfingen  
73173 Sindelfingen  
Claudia Nidals  
President  
Modelwerk Modellingagentur GmbH



July 8, 2014

Department of Homeland Security  
United States Citizenship and Immigration Services  
Vermont Service Center  
30 Houghton Street  
Saint Albans, VT 05478

Re: O-1 Extraordinary Ability as an Art Director and Talent Coordinator on behalf of Jean-Luc Didier Henri-Rene Brunel

To Whom It May Concern:

As a President of Natalie Model Management, this letter is submitted in support of MC2 Models Miami, LLC, on behalf of Mr. Jean-Luc Brunel to work as an Art Director and Talent Coordinator.

Mr. Brunel holds an international reputation as a visible, strategic networker who is able to cultivate expert relationship management skills in order to conduct business in a global environment and broker lucrative deals. Mr. Brunel has a long history in marketing and advertising major fashion campaigns. Throughout his twenty-five year career in the fashion business, Mr. Brunel has developed worldwide, exclusive modeling and cosmetic campaigns. Some of these major cosmetic campaigns include: Bio Therm with supermodel Elle McPherson, PHAS with Rebecca Romijn, Christian Dior with Christina Semonovskaya, Margret Astor with Monica Bellucci, Chanel with Patricia Von Ritzenheim, Angel Perfume with Thierry Mugler, and Cacharel Perfume with Aldo Balestra. Mr. Brunel has also developed major fashion campaigns and has developed campaigns and exclusive contracts with some of the world's top fashion designers such as Yves Saint Laurent, Chanel, Christian Dior, Gucci, Prada, and Marc Jacobs.



In addition to Mr. Jean Luc Brunel's extensive business qualifications, his career as an individual with artistic vision and creative talents has helped him find top fashion models to represent in the United States.

Should you have any questions about Mr. Jean Luc Brunel qualifications feel free to contact me.

Sincerely,



Eric Meisart

Vermont Service Center  
Attn: Premium Processing Unit  
30 Houghton Street  
St. Albans, Vermont 05478-2399



## Facsimile Transmission

**To:** LUIS FONT **Fax Number:** [REDACTED]  
**Number of pages including cover:** **Date:** September 5, 2014  
**From:** Vermont Service Center – Premium Processing Unit **Fax Number:** 802-266-1778  
**Email:** [VSC\\_PREMIUM\\_PROCESSING@DHS.GOV](mailto:VSC_PREMIUM_PROCESSING@DHS.GOV) **Phone:** 1-[REDACTED]  
**Receipt Number:**

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Attached you will find a copy of our decision concerning your case

The original decision will follow via mail. If eligible to appeal our decision appeal forms will be included.

\*\*\*Important\*\*\*Important\*\*\*Important\*\*\*Important\*\*\*

If responding to a Request for Evidence or Intent to Deny, ensure you include a copy of the decision immediately following your cover page and indicate the total number of pages included with your response. Please include the case receipt number (e.g. EAC01 000 12345) with all correspondence.

Ensure when responding to this request that you fax your response to our **NEW FAX NUMBER** - [REDACTED]

If you wish to mail a response, it must be sent to the VSC Premium Processing Unit at 30 Houghton Street, St. Albans, VT 05478-2399. Do not send your response to the 75 Lower Welden Street address, as that will cause delays and will not restart the premium processing clock until the response is identified as a premium processing case.

Title 8 CFR Section 103.2(b)(11) Submission of evidence in response to a Service request states:

All evidence submitted in response to a Service request must be submitted at one time. The submission of only some of the requested evidence will be considered a request for a decision based on the record.

This communication is intended for the sole use of the individual to whom it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this communication is not the intended recipient or the employee or agent for delivering the communication to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication may be strictly prohibited. If you received this communication in error, please notify the sender immediately by telephone and return the communication at the address above via United States Postal Service. Thank you.

[www.uscis.gov](http://www.uscis.gov)

EFTA01122347

<b>Applicant/Petitioner A #</b>	Application/Petition Petition For A Nonimmigrant Worker (form I-129)
<b>Notice Date</b> August 26, 2014	<b>Response due by</b> November 21, 2014

MC2 MODELS MIAMI LLC  
1106 FONT  
FONT LAW GROUP PA  
3440 HOLLYWOOD BLVD STE 410  
HOLLYWOOD FL 33021

**EAC1422550803**  
"EAC1422550803"

<b>Applicant/Petitioner</b> MC2 MODELS MIAMI LLC
<b>Beneficiary</b> BRUNEL JEAN LUC
<b>Receipt Number</b> EAC1422550803(I129)

**PREMIUM PROCESSING**

**IMPORTANT: THIS NOTICE CONTAINS YOUR UNIQUE NUMBER AND MUST BE SUBMITTED IN THE ORIGINAL WITH THE REQUESTED EVIDENCE**

1. U.S. Citizenship and Immigration Services (USCIS) requires additional evidence to process your form. Please provide the evidence listed on the attached page(s). For Form I-129 only, if you are requesting consulate embassy notification, provide the requested evidence in duplicate.
2. Your response must be received in this office on or before November 21, 2014. Please note the required deadline for providing a response to this Request for Evidence. The deadline reflects the maximum period for responding to this RFE. However, since many immigration benefits are time sensitive, you are encouraged to respond to this request as early as possible but no later than the date provided on the request. You will not be granted an extension of time to submit the requested evidence.
3. You must submit all requested evidence at the same time. If you submit only some of the requested evidence, USCIS will consider it a request for a decision on the record [8 CFR 103.2b(c)(1)].
4. You will be notified separately about any other applications or petitions you have filed.
5. From the date this office receives your submission, a maximum of 14 days will be required to process your form. If you have not heard from USCIS within 30 days, you may contact this office at (866) 315-5718.
6. Mail this notice and your response to:

VSC Premium Processing  
Vermont Service Center  
30 Houghton Street  
St Albans VT 05478-2399  
[vsc-premium-processing@dhs.gov](mailto:vsc-premium-processing@dhs.gov)

EAC14.22550803 (I129)

Responses (for Premium Processing cases only) may be faxed to [REDACTED]. Include a copy of this notice. The e-mail address may only be used for inquiries. Do not send responses to the e-mail address.

#### I-129 O-1B Extraordinary Ability in the Arts

You, MC2 Models Miami, LLC, filed Form I-129, Petition for Nonimmigrant Worker, seeking O-1B nonimmigrant classification for Jean-Luc Brunel as an Art Director / Talent Coordinator.

The O-1B classification applies to individuals with extraordinary ability in the arts. The individual must have sustained national or international acclaim. His or her achievements must be in the field of expertise and show a record of prominence in his or her field.

To process your petition and determine if the beneficiary is eligible, additional information is required. This request provides suggested evidence that you may submit to satisfy each requested item. You may:

- Submit one, some, or all of these items.
- Submit none of the suggested items and instead submit other evidence to satisfy the request.
- Explain how the evidence in the record already establishes eligibility.
- Request a decision based on the record.

Note, however, that you are responsible for providing evidence that best shows that you and the parties to this petition meet all requirements. Evidence must show that all parties were eligible for the requested benefit when you filed Form I-129.

#### General Requirements for All O Nonimmigrant Petitions

In general, petitions seeking O nonimmigrant classification must include:

- Copies of contracts.
- A description of the competition(s), event(s), or performance(s), and
- At least one consultation.

To satisfy these requirements, you submitted:

- Your letter in support of the petition, and  
Peer letters in support of the beneficiary from Claudia Misko and Alla Amantova.

#### Beneficiary's Previous O-1 Status

Petitions involving an extension of status for a beneficiary that has previously been granted O-1 nonimmigrant status may be given deference; however, U.S. Citizenship and Immigration Services (USCIS) is authorized to question extension petitions when a substantial change in circumstances occurs, when relevant facts change from one petition to another, or when the prior approval may have been based on gross USCIS error.

You indicate that the beneficiary was previously granted O-1 nonimmigrant status with your company. The details of the beneficiary's previous employment with your company are not documented in the instant petition. A review of the evidence submitted indicates that if the beneficiary's role within your organization has remained unchanged, the previous petition may have been approved in error, as the list of duties you provided do not appear to describe a

Form I-797 (8/03/90) Y

FBI OFFICE USE ONLY

S

EAC1422550803 (11.29)

position in the arts.

In addition, no evidence has been submitted to support your claim that the beneficiary is an individual who has extraordinary ability in the arts that has been demonstrated by sustained national or international acclaim. You have documented the beneficiary's past success in the business of forming and operating modeling agencies, but this evidence points to the beneficiary's ability in the field of business, not the arts. Therefore, you are asked to comply with the following:

#### Contracts

Petitions seeking O-1 nonimmigrant classification must include a copy of a contract between the beneficiary and either the petitioner or the employer. If a written contract does not exist, you may submit a detailed summary of the terms of the oral agreement between the beneficiary and either the petitioner or the employer.

You did not submit any evidence for this requirement. You may still submit evidence to satisfy it.

Written contracts, or the summary of the terms of an oral agreement, must specify the terms and conditions of the employment or services. They must:

- Specify the wage offered and explain the terms and conditions under which the beneficiary will perform these services, and
- Detail any additional services provided.

#### Nature of the Event or Engagement

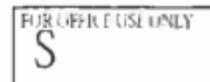
You must provide an explanation of the competition, event, or performance in which the beneficiary will participate. An event means an activity such as a scientific project, conference, convention, lecture series, academic year, or engagement during the requested validity period.

The description you submitted is insufficient. In your letter you list the duties of the proffered position as:

- Responsibility for overseeing the artistic aspects of the agency (select the images placed on the models' business cards and in their portfolios)
- Coordinate the pairing of models with photographers
- Direct the marketing of models to clients
- Travel around the world to discover new talent and to sign them with MC2 Models, and
- Establish relationships with agencies around the world and negotiate representation agreements.

The duties you describe appear to relate exclusively to the maintenance of business operations of a modeling agency. As previously stated, you have documented the beneficiary's past success in forming and operating modeling agencies; however, this evidence points to the beneficiary's ability in the field of business, not the arts. It is not evident, therefore, that the O-1B nonimmigrant classification is appropriate in the instant case.

Regulations define the "arts" as any field of creative activity or endeavor such as, but not limited to, fine arts, visual arts, culinary arts, and performing arts. Artists engaged in the field of arts include not only the principal creators and performers but other essential persons such as, but not limited to, directors, set designers, lighting designers, sound designers, choreographers, choreologists, conductors, orchestrators, coaches, arrangers, musical supervisors, costume



EAC1422550803(11.29)

designers, makeup artists, flight masters, stage technicians, and animal trainers.

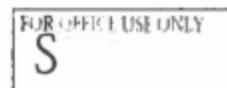
The duties you describe correspond to business and management functions, not to a position in the arts. Before adjudication of your petition can proceed, this discrepancy must be resolved.

You may still submit evidence to satisfy this requirement.

The description must include:

- An explanation of the nature of the events or activities, beginning and ending dates of the events or activities, and
- A copy of any itinerary that shows dates, name(s) of the employer(s), and location of the event(s).

You must establish that the proffered position qualifies as a position in the arts as described above. Any and all claims must be fully supported by documentary evidence.



FONT LAW GROUP, P.A.  
3440 Hollywood Boulevard, Suite 415  
Hollywood, FL 33021  
Tel.: [REDACTED] Fax: [REDACTED]

November 3, 2014

Director  
United States Citizenship & Immigration Services  
Vermont Service Center  
75 Lower Welden Street  
Saint Albans, VT 05479

RE: NOTIFICATION OF WITHDRAWAL OF I-129 PETITION  
WITHOUT PREJUDICE BY PETITIONER  
EAC-14-225-50803  
Petitioner: MC2 MODELS MIAMI LLC  
Beneficiary: JEAN LUC DIDIER HENRI RENE BRUNEL

Dear Sir/Madam:

Please be advised that this office represents the above referenced petitioner and beneficiary in this immigration matter and a G-28 from our office is on file.

THE PETITIONER, MC2 MODELS MIAMI LLC HEREBY NOTIFIES USCIS THAT IT WISHES TO WITHDRAW I-129 O-1 PETITION #EAC-14-225-50803. The petitioner requests withdrawal of this I-129 petition without prejudice. Please note this request for the record in the above referenced case.

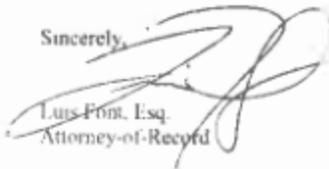
We respectfully request that you send us verification of this withdrawal pursuant to the regulations contained in 8 C.F.R. Sec. 103.2 (b) (15).

Kindly send our office a written verification of this withdrawal located at:

Font Law Group, P.A.  
3440 Hollywood Boulevard, Suite 415  
Hollywood, FL 33021

Thank you for your attention to this matter.

Sincerely,

  
Luis Font, Esq.  
Attorney-of-Record

----- Original message -----  
From: Jeff Fuller  
Date: 11/12/2014 11:49 (GMT-05:00)  
To: Jean Luc Brunel  
Subject: RE: New York

Jean Luc,

I am really sorry you feel so bad and I know it has been a mental and psychological frustration. As you know I chose to partner with you due to your reputation in the business for being a top scout and developing a couple world class agencies in the past. I knew what you could bring and I knew what I could bring and contribute and I thought it would be a great partnership. Clearly, I never expected to have the level of challenges we have had recruiting new models over the last several years. I could have never foreseen the problem of your friendship with Jeffrey Epstein turning into the situation it has where you are seen as guilty by association when you have never done anything or even been convicted of a crime. Frankly, I don't understand the necessity for [REDACTED] or anyone else to continue to defame your name and MC2 by association.

It is true that we constantly have to justify ourselves when recruiting new models. The industry is extremely competitive and as a parent myself if faced by the same information and having to make a tough decision between two agencies I would not pick MC2 if I saw the article online about you. You have to read closely to see there is not a charge against you but the implication is strong and of course now days everyone believes everything they read online even more than the traditional newspapers of the past.

I know you are now feeling like a liability to MC2. But you personally are not a liability to MC2 but this published information online is a liability. We are not a large enough company, nor do we have the capacity to fight this on a global level. On a google search in America we have put enough information online to not have it popping up so blatantly but we have no controls over the rest of the world or the finances to control this situation and we are affected as every major model agency recruits it's best models from all the various countries abroad. This has stunted our growth and our billing over the past 6 or 7 years. In fact, we do not even know who avoids us based on finding this information. I have been surprised how challenging it is for us to grow due to this problem.

I have also had a tremendous amount of worries from our clients that we are vendors for that are large American corporations like Kohls, JC Penney, Sears, Nordstrom, Target, Neiman Marcus, Macys, Saks, Belk, and so forth that require vendor agreements and for us to be considered an upstanding company. It really worries me as some of those companies have disassociated themselves from what

**EXHIBIT K**

EFTA01122353

they believe to be questionable companies. So far that has not been a problem but it could come up in the future.

The fact that you are requested for so many scouting events in various countries and cannot promote yourself properly to promote MC2 in the press due this problem has it's own sent of repercussions in terms of our global branding. In short, it has had a terrible effect on MC2 all around. I really urge you to solve this problem and get this removed from the internet so we can grow for the future. I've fought for MC2 and been extremely loyal but I must confess that I have even been feeling inadequate and questioning my ability as the leader of the organization. I can only attribute the fact that we have scraped by in the recession and barely survived in the past to your hard work, my hard work, and the tenacity of both of us combined.

I can only imagine that if I am feeling inadequate and frustrated over a lack of growth of our company that you must feel even worse as you have had much greater success in your career and have operated at much higher standards in our industry in all areas from reputation, respect, admiration and monetary gains. I can even surmise you are probably feeling a level of depression and I have seen it in your highs and lows and when you have voiced your frustration. While I know you well and recognize you don't really go for the kind of advice I will offer; however, I think you should at least speak to someone neutral such as a therapist or a counselor to let your frustrations out and if you don't feel better and are still feeling down or depressed to see a medical doctor for your condition. You are such a positive person I hate to see you fighting what you feel is a hopeless battle. It is not hopeless you just need find a way to get that information offline and begin to repair your reputation. In the end I am afraid the damages are a lot more than you realize but let's keep fighting and moving forward as we have no choice.

Thanks,

Jeff

Jeff Fuller

President

MC2 Model Management USA

**EXHIBIT K**

EFTA01122354

FROM: JACQUIE JOHNSON - [REDACTED]  
DATE: SEPTEMBER 18, 2009 3:57:44 PM EDT  
TO: [REDACTED]  
CC: "BRADLEY J. EDWARDS" [REDACTED]  
SUBJECT: EPSTEIN - DEPO OF JEAN LUC BRUHNEL

We have confirmation for Mr. Bruhnel's deposition on 11/3. We will commence at 10:00 a.m. if that is ok with you.

Jacque Johnson  
Legal Assistant to  
Brad Edwards, Esq.  
Partner  
Rothstein Rosenfeldt Adler  
401 East Las Olas Blvd.  
Suite 1650  
Fort Lauderdale, FL 33301  
Telephone [REDACTED]  
Fax [REDACTED]

**EXHIBIT L**

EFTA01122355

—Original Message—

From: Tama Beth Kudman <[REDACTED]>

Date: Monday, November 16, 2009 at 7:48 PM

To: Jean Luc Brunel <[REDACTED]>

Subject: Re: Hi

>All depositions are cancelled for now. A letter confirming this is being  
>Sent out today. We have no idea how long this shall delay things. I'll  
>let Michael know.  
>  
>Sent from my iPhone  
>Tama Beth Kudman

**EXHIBIT M**

EFTA01122356

**From:** "Dr. Royce Jalazo" <[REDACTED]>  
**To:** [REDACTED]  
**Sent:** Tuesday, December 23, 2014 2:40:59 PM  
**Subject:** Jean Luc Brunel

Mr. Titone,

[REDACTED]

Thank you,

--

**Royce N. Jalazo, Psy.D.**  
Licensed Psychologist

**Dynamic Behavioral Consulting**  
a DBA of Dr. Royce Jalazo, P.A.  
1975 E. Sunrise Blvd., Suite 532  
Ft. Lauderdale, FL 33304

Direct (With Voicemail): [REDACTED]  
Toll Free Fax: [REDACTED] or [REDACTED]

E-mail: [REDACTED]  
Website: [www.DynamicBeh.com](http://www.DynamicBeh.com)

**EXHIBIT N**



**DYNAMIC  
BEHAVIORAL  
CONSULTING**

Psychotherapy • Evaluations • Consultations

Client Progress / Informational Notation  
Dynamic Behavioral Consulting  
1975 E. Searles Blvd, Suite 532  
Ft. Lauderdale, Florida 33304-1413

Client: Jean Luc Brunel  
Service:  Individual Session  Family Session

Date: 12/12/14 M T W T H F R S A S U  
Time: 8:15 a.m. / p.m. 4:05 a.m. / p.m.  
Duration: 50 minutes

Session #: \_\_\_\_\_  
Hyperverbal in his speech, hyper-intense statements, very dramatic, jumps from topics to topics

MOOD, (use client's words if possible)

<input type="checkbox"/> Calm/Euphoric	<input type="checkbox"/> Cheerful/Jolly	<input checked="" type="checkbox"/> Irritable/Angry	<input type="checkbox"/> brooding
<input type="checkbox"/> Fearful/Anxious	<input type="checkbox"/> Depressed/Sad	<input checked="" type="checkbox"/> Tearful	<input type="checkbox"/> Other:
<input type="checkbox"/> Hopeless	<input type="checkbox"/> Pessimistic	<input type="checkbox"/> Neutral	
<input type="checkbox"/> Other, explain:			
AFFECT, (check one)			
<input type="checkbox"/> Appropriate	<input type="checkbox"/> Inappropriate	<input type="checkbox"/> Labile	<input checked="" type="checkbox"/> Dramatized
<input type="checkbox"/> Blunted / Restricted	<input type="checkbox"/> Flat	<input type="checkbox"/> Slightly Intense	<input type="checkbox"/> Unknown (telephonic session)

SESSION CONTENT: Volatilities between cheerful (making jokes) to volatile statements  
 Mr. Jean Luc Brunel is a 68-year old divorced Parisian - American male who is seeking psychotherapy due to a subjective sense of depression related to what he believes is a loss of business. In his modeling career as a result of a scandal published against his business. Mr. Brunel reports that in 2006 a friend was reported of a sex offense (in a use and relation with an individual girl) and that after he started his model in jail 3 times, a local journalist began publishing a the internet that this company, M&S, was involved in a sex trafficking, an allegation that he vehemently denies. Most recent reports sleep disturbance but able to maintain sleep with sleep aids.

PSYCHOTROPIC MEDICATION: (circle and check all that apply)

Was patient referred for psychiatric evaluation by underlined and/or prescribed psychotropic medications by a psychiatrist but is present?  Y  N Comment:

Is patient current taking psychotropic medications:  Y  N Type / Dosage:

Compliant as prescribed?  N/A  Y  N Comment:

MOTIVATION FOR TREATMENT CHANGE:

Highly motivated  Reasonably motivated  Poorly motivated  Unmotivated

DISPOSITION:

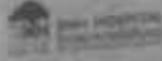
Continue Treatment  Termination of Treatment  Refer to psychiatrist / other provider / Reason: \_\_\_\_\_

Other: \_\_\_\_\_

Personality Disorder, unspecified  
 Adjustment Disorder with Depressed and Anxious Moods.

Rayne N. Alamo, Psy D.  
 Licensed Psychologist #PY7671

**COMPOSITE  
EXHIBIT P –  
MEDICAL  
HISTORY**



International  
**MEDICAL CERTIFICATE**

Referring authority name, address and telephone number  
Name of patient: \_\_\_\_\_

Age: \_\_\_\_\_  
Sex: \_\_\_\_\_

Diagnosis: *Depressive episode & Anxiety*

Treatment: *Psychiatric Treatment*

Remarks: \_\_\_\_\_



Signature of Doctor: \_\_\_\_\_

Stamp of the Hospital/Institution: \_\_\_\_\_



แผนกผู้ป่วยนอก / OPD

ใบเสร็จรับเงิน/Receipt

ชื่อ / Patient Name: MR. JUAN-LIX BRUNEL  
 หมายเลขบัตรผู้ป่วย / No: 09-10-010876  
 อายุ / Age: 42 ปี  
 วันที่รับบริการ / Visit Date: 02/12/2014 1:27PM

เลขที่ใบเสร็จรับเงิน / Document No: 99-RX14256417  
 วันที่ / Date: 02/12/2014  
 เลขที่เตียง / No: 1248  
 เวลา / Time: 1:58PM

คำอธิบาย Description	จำนวนเงิน Amount	ส่วนลด Discount	สุทธิ Tax Amount
Drugs and Parenteral Nutrition 1.1.1			
Medication 1.1.1	1,480.00	0.00	1,480.00
Package Medical Charge 1.1.14			
Other Medical Service Charges 1.1.14C1	200.00	0.00	200.00
Physician Evaluation 1.2.1			
Physician Evaluation 1.2.1	800.00	0.00	800.00
<b>รวมสุทธิ</b>			
Total Amount to be paid		4,480.00	0.00
รวมสุทธิ		4,480.00	0.00

**RECEIVED**  
 02 Dec 2014

BY: .....

\*\*Please disregard this receipt if only Cash only\*\*  
 Credit Card 3,680.00 / 19% Vat  
 โปรดอ่านใบเสร็จรับเงินฉบับนี้ให้ละเอียดก่อนใช้ยา. ใบเสร็จรับเงินนี้ใช้ได้เฉพาะกรณีจ่ายยาเท่านั้น. กรุณาอ่านคำแนะนำการใช้ยาที่แนบมา.  
 Patients may return the medicine only if they have experienced adverse reaction to that medication.  
 Please keep this receipt for reference.

โรงพยาบาลบีเอ็นเอช (BNH Hospital)  
 100 ถนนวิภาวดีรังสิต แขวงจตุจักร เขตจตุจักร กรุงเทพฯ 10330 โทร. 0-2956-2700 โทรสาร 0-2952-0517-8  
 BNH HOSPITAL, 100, Gopichand Rd, Jitom, Bangkok, Bangkok 10330, Thailand. Tel: 0-2956-2700 Fax: 0-2952-0517-8  
 www.bnghospital.com



**BNH HOSPITAL 1NR 31**

**โรงพยาบาลบีเอ็นเอช**  
(Bangkok Nursing Home Hospital)

MR. JEAN - LUC BRUNEL

0141221248

02/12/2014 13:55:33



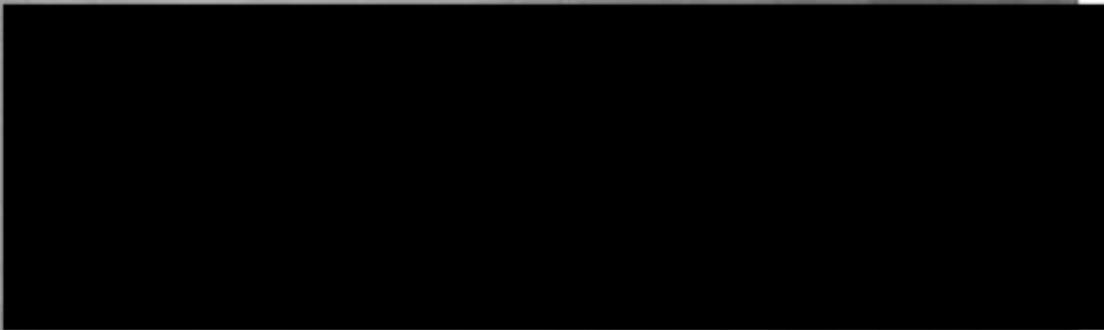
Tel. 02-686-2700 Fax. 02-632-0577-9

[www.BNHhospital.com](http://www.BNHhospital.com)



**BNH HOSPITAL**  
**โรงพยาบาลบีเอ็นเอช**  
**(Bangkok Nursing Home)**

MR. JEAN - LUC BR



Once Daily Before Bed

(It May Cause Drowsiness)

**EXHIBIT Q**

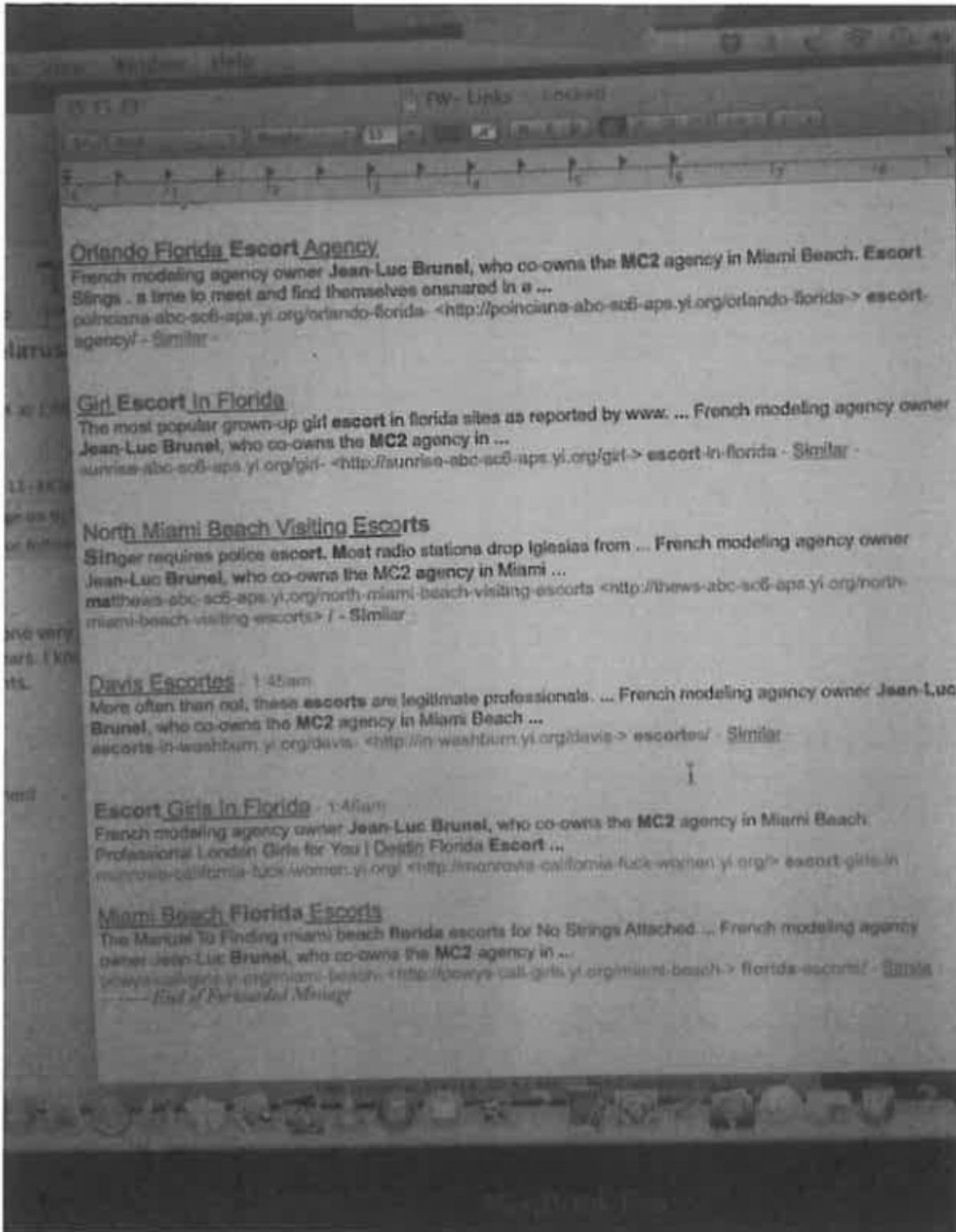


EXHIBIT Q

<http://www.politico.com/blogs/under-the-radar/2014/12/court-filing-levels-sex-claims-at-alan-dershowitz-200495.html>

## Woman who sued convicted billionaire over sex abuse levels claims at his friends

By JOSH GERSTEIN |

12/31/14 6:38 PM EST

A woman allegedly kept as a sex slave by politically-connected billionaire investor Jeffrey Epstein, who went to jail for having sex with underaged girls, is accusing several prominent friends of the financier of having taken part in the debauchery, according to a new court filing.

The woman—referred to in court papers as Jane Doe #3—leveled the allegations Tuesday against Harvard Law School professor Alan Dershowitz and Britain's Prince Andrew, as well as British socialite Ghislaine Maxwell and French model scout Jean Luc Brunel.

Dershowitz flatly denied the claims about him Wednesday in an interview with POLITICO.

"It's totally, unequivocally and completely false," the celebrated attorney said.

A spokesman for Prince Andrew denied the allegations Friday, while a lawyer who handled related matters for Maxwell did not respond to an e-mail seeking comment. Representatives of Brunel's modeling firm also did not reply to e-mail messages.

The accusations came in a long-running lawsuit charging federal prosecutors in Florida with violating a victims-rights law by failing to consult with Epstein's victims before signing off on a plea deal. That pact ruled out any federal prosecution of the investor, who agreed to plead guilty to two state prostitution-related felony charges. Lawyers for the victims have described the arrangement as a sweetheart deal the well-connected Epstein and his high-powered legal team achieved by putting pressure on prosecutors.

Epstein served 13 months of an 18-month sentence on the two state charges before being released in 2009. He's now a registered sex offender.

The new court filing, submitted by Florida lawyer Brad Edwards and former federal judge Paul Cassell in a federal court in West Palm Beach, Fla., asked that Jane Doe #3 and another woman be allowed to join the pending case over the victims' rights claim.

"Epstein...trafficked Jane Doe #3 for sexual purposes to many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders. Epstein required Jane Doe #3 to describe

### EXHIBIT R

the events that she had with these men so that he could potentially blackmail them," the court filing said.

"One such powerful individual that Epstein forced then-minor Jane Doe #3 to have sexual relations with was former Harvard Law Professor Alan Dershowitz, a close friend of Epstein's and well-known criminal defense attorney. Epstein required Jane Doe #3 to have sexual relations with Dershowitz on numerous occasions while she was a minor, not only in Florida but also on private planes, in New York, New Mexico, and the U.S. Virgin Islands," the legal pleading added.

Dershowitz called the allegations "totally made up and totally fabricated from beginning to end." He said he was not in the places described in the filing at the relevant times, with one exception: he did visit Epstein's private island in the Caribbean on one occasion.

"I was there with my family," the renowned law professor said.

Dershowitz said in a follow-up interview after this post first appeared Wednesday that he's planning to file bar complaints against Edwards and Cassell for inadequately vetting their client's story.

"I'm planning to file disbarment charges against the two lawyers who signed this petition without even checking the manifests of airplanes or travel itineraries, et cetera," he said. "I'm also challenging the young woman and the lawyers to level those charges against me outside of the courtroom, so that I can sue them for defamation.....Finally, I'm challenging the woman to file criminal charges against me because the filing of false criminal charges is a crime."

The motion accuses Prince Andrew of similar actions, asserting that "Jane Doe #3 was forced to have sexual relations with this Prince when she was a minor in three separate geographical locations: in London (at Ghislaine Maxwell's apartment), in New York, and on Epstein's private island in the U.S. Virgin Islands (in an orgy with numerous other under-aged girls)."

Previous press accounts have reported on Prince Andrew's friendship with Epstein, who was known as a philanthropist and supporter of scientific research before the criminal investigations began nearly a decade ago. However, the earlier accounts stopped short of accusing the prince of sexual involvement with girls Epstein procured. In a 2011 Vanity Fair story, Prince Andrew denied any such contact.

While a Buckingham Palace spokesman did not respond to POLITICO's query about the matter on Wednesday, the palace issued a denial to several [British news outlets](#) Friday. "This relates to long-standing and ongoing civil proceedings in the United States, to which The Duke of York is not a party. As such we would not comment on the detail. However, for the avoidance of doubt, any suggestion of impropriety with underage minors is categorically untrue," the statement said.

Prosecutors said in a 2007 draft letter they'd identified 40 young women who could be considered victims of Epstein's illegal acts. Many of them filed lawsuits or claims against Epstein and reached out-of-court settlements for amounts that were not disclosed.

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While “Jane Doe #3” is unidentified in this week’s court filing, her story appears to track with that of a woman who sued Epstein in 2009 and settled with him later that year. She apparently granted an on-the-record interview to Britain’s Daily Mail in 2011.

Some of the fascination with Epstein on the part of tabloids and glossy magazines stems from his ties to former President Bill Clinton. In 2002, Epstein provided his 727 to Clinton for a trip to Africa to study anti-AIDS programs. Celebrities such as Chris Tucker and Kevin Spacey came along for the ride. The new court filing makes no mention of Clinton, Tucker or Spacey.

The federal investigation obtained manifests for Epstein’s private jet travel, but prosecutors never charged anyone besides the investor with involvement in obtaining or using underaged girls for sexual purposes.

The new court filing says this result is in part due to the fact that Epstein’s legal team—which included such heavyweights as former independent counsel and solicitor general Ken Starr, trial lawyer Roy Black, and Dershowitz—negotiated a deal that precluded the feds charging anyone as a co-conspirator.

Lawyers for Jane Doe #3 argue in the new motion that Dershowitz put this language in the agreement to protect himself.

However, the law professor told POLITICO he didn’t negotiate that deal and it wasn’t aimed at protecting him. “I had nothing to do with drafting the non-prosecution agreement,” he said.

Dershowitz added that the last draft of the agreement mentioned four people by name who wouldn’t be prosecuted and he was not among them. All were regular associates or assistants of Epstein, the lawyer said, adding that the final language removed those names and simply barred federal prosecutors in South Florida from going after any potential co-conspirators.

Epstein and his lawyers fought hard to prevent records about his plea negotiations from being turned over to victims’ attorneys. However, U.S. District Court Judge Keith Marra ruled last year that the victims are entitled to examine those records to prepare their case against the government.

Epstein, Black and others appealed that decision to the Atlanta-based 11th Circuit Court of Appeals, but it ruled in April of this year that no privilege protects plea negotiations in this sort of dispute.

Edwards and Cassell did not respond to requests for comment for this post, including an inquiry about their response to Dershowitz’s comments. However, the pair appear to be pressing forward with the victims’ rights lawsuit, which seeks to unravel the no-federal-prosecution deal cut for Epstein in 2007.

*UPDATE (Wednesday, 7:18 P.M.): This post has been updated with further comment from Dershowitz.*

## **EXHIBIT R**

----- Original message -----

**From:** Abi Schwinck  
**Date:** 16/01/2015 05:16 (GMT+07:00)  
**To:** Pink ,Jean Luc Brunel ,Jeff Fuller  
**Subject:** FW: Victoria

**From:** Erik Bechtol [REDACTED]  
**Sent:** Thursday, January 15, 2015 5:12 PM  
**To:** Abi Schwinck  
**Subject:** Victoria

Hey Abi!

Hope you're well. :) I've just had a conversation with Victoria, and she isn't comfortable remaining with MC2 with all the drama going on right now in the press. She's asked me to contact you on her behalf. Please let me know if you see any issue with this. Thanks so much!

---

Erik Bechtol

Agency Director

**Page Parkes Houston**

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**EXHIBIT S**

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F: [REDACTED]

**EXHIBIT S**