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EMAIL ADDRESSES:



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**Via Email and U.S. Mail**

John Zucker  
Assistant Legal Counsel  
Office of Legal Counsel  
77 W 66TH St, Room 1628  
New York, NY 10023

**Re: Good Morning America and Night Line interview with Jane Doe 3**

Dear Mr. Zucker:

I represent Jeffrey Epstein. I have been informed by Producer James Hill that ABC intends to air an interview, conducted by a Good Morning America co-host, of a woman known in court papers as Jane Doe 3.<sup>1</sup> I write to put you on notice that ABC's publication of Jane Doe 3's accusations is grossly negligent or worse. The accusations, many of which relate to my client, relate to alleged conduct that occurred approximately 15 years ago. The current accusations are simply reformatted and embellished echoes of previous allegations, which were first made by Jane Doe 3 to tabloid publications in the United Kingdom in 2011 and which have no independent news value. These allegations were then and remain now uncorroborated and have been refuted or undermined by other, credible evidence. Indeed, a federal judge recently refused to consider these allegations in pending litigation, finding them "immaterial and impertinent", while striking the allegations and denying Jane Doe 3s Motion to Join, See Jane Doe 1 and 2 v. United States, 08-CV-80736-KAM (S.D. Fla.), Dkt 324 at 5. In addition, in that very same litigation, Federal Bureau of Investigation Special Agent [REDACTED] filed a declaration stating that when Jane Doe 3 was interviewed by the FBI in 2007 she refused to cooperate with the investigation of Mr. Epstein declaring she wanted nothing to do with the matter. For ABC to air these untested allegations on national television as "news" when Jane Doe 3 intentionally declined eight years ago to subject these same allegations to verification by the FBI would be grossly irresponsible and severely damaging to Mr. Epstein and others.

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<sup>1</sup> Mr. Hill informed me that she was waiving whatever rights to anonymity she might assert but I will, because of certain legal obligations, refer to her as Jane Doe 3.

This is particularly true when ABC knows or should know that several, very specific allegations of Jane Doe 3 have been rebutted and/or demonstrated by others to be false. For example, I understand that she has accused distinguished Professor Alan Dershowitz of Harvard Law School of sexual misconduct involving her. Professor Dershowitz has flatly denied that allegation under oath in a federal court proceeding. I further understand that Professor Dershowitz offered to play a tape recording for Mr. Hill that evidences that Jane Doe 3 has made recent contradictory statements—that is, that she was pressured into including Professor Dershowitz in her allegations and that she has a financial motive in making these allegations.

The Duke of York and the Royal Palace have likewise unequivocally denied Jane Doe's similar allegations against the Duke. Surely, these unequivocal statements of denial of respected members of society are entitled to some deference by ABC, particularly where, as here, there is substantial evidence of bias, improper motive, and serious credibility problems of their accuser.

Moreover, additional claims of Jane Doe 3 can be refuted with objective evidence that is readily obtainable by ABC. For example, she claims she was in the presence of both former President Clinton (after January 20, 2001, and before the summer of 2002) and former Vice President Gore (and his wife) at Mr. Epstein's Virgin Island home. I have been told by Mr. Hill that she claims to be 100% sure of the facts regarding President Clinton. The claims are completely uncorroborated and compellingly contradicted by others. Neither former President Clinton nor former Vice-President Gore and his wife have ever been present at Mr. Epstein's Virgin Island home. A review of United States Secret Service records, obtainable through a Freedom of Information Request would prove the falsity of the claim. Virgin Island government records would provide further confirmation. I also believe that Mr. Hill has been told by individuals with percipient knowledge that former President Clinton has never been to Mr. Epstein's Virgin Island home. Upon inquiry, I am certain that you would receive similar denials from Mr. and Mrs. Gore either directly or by or through their counsel Mr. Boies. Jane Doe 3's fabrication of these claims against respected former officials undermines completely the trustworthiness of each and every one of her remaining allegations.

We would expect that, in the wake of the damning independent review of Rolling Stone's publications of rape allegations involving students at the University of Virginia, ABC would proceed with similar, uncorroborated allegations with extreme caution. At the very least, ABC has an obligation to verify—with independent evidence—the truthfulness of Jane Doe 3's claims. Merely declining to air those portions of her interview that relate to President Clinton and Vice-President Gore is insufficient. If ABC has concerns about her credibility with respect to any allegation, it must decline to republish all of her allegations.

In June of 2008, Mr. Epstein pleaded guilty to Florida state charges that do not relate to Jane Doe 3. After an extensive investigation, the United States declined to prosecute Mr. Epstein and provided him with a Non-Prosecution Agreement. Mr. Epstein fully conformed to the responsibilities and obligations imposed on him by that agreement. Mr. Epstein is not engaged in public activities. He is a private person who has complied and continues to comply with his legal obligations, and he is attempting to move forward with his life in a productive way. The allegations of Jane Doe 3 are neither credible nor news worthy. ABC should not publish them.

Yours Truly,

**/s/Martin G. Weinberg**

CC James E Hill, ABC News