EXHIBIT K

BOIES, SCHILLER & FLEXNER LLP

401 EAST LAS OLAS BOULEVARD • SUITE 1200 - FORT LAUDERDALE, FL 33301-2211 • PH, 954,356,0011 • FAX 954,356,0022

Sigrid S. McCawley, Esq. E-mail: smccawley@bsfllp.com

June 10, 2016

VIA E-MAIL

Laura A. Menninger, Esq.
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Imenninger@hmflaw.com

Re: Giuffre v. Maxwell

Case No. 15-cv-07433-RWS

Dear Ms. Menninger:

On behalf of the Plaintiff, Virginia Giuffre, documents, Bates-stamped GIUFFRE005607 through GIUFFRE005613, are being produced pursuant to Defendant's Request for Production. Certain of the documents within this production have been designated as CONFIDENTIAL in accordance with your proposed Protective Order. Please treat these documents accordingly

This production consists solely of all data that is responsive to Defendant's various requests for production from Ms. Giuffre's iCloud account.

Attached to this letter, please also find an updated privilege log.

If you have any questions concerning the foregoing, or if there are any issues with the media, please do not hesitate to contact me at (954) 356-0011.

Sincerely,

Sigrid S. McCawley

SSM:dk Enclosures From: Richards, Jason R.
To: Robert Giuffre
Subject: RE: Hi There

Date: Wednesday, August 27, 2014 10:44:32 AM

Hi Jenna,

My suggestion is for you to do a Freedom of Information Act request (www.foia.gov) for the information you are looking for because I am not able to release information (should there be any) from FBI records. You need to include as many details as possible so they can focus and narrow the search. Explain that you are looking for information related to your recovery as a victim of Ron Eppinger. The process may take some time but it is the appropriate method for you to obtain any possible records regarding your recovery. Hope this helps.

Best wishes,

Jason

-----Original Message-----

From: Robert Giuffre

Sent: Wednesday, August 27, 2014 9:49 AM

To: Richards, Jason R. Subject: Hi There

G'day Jason,

I know I am a pain in your rear right now and I don't want to be but I am so close to wrapping up an era, just need a couple dates confirmed is all.

If you aren't sure about the dates which you have already said that's fine. I have turned the Wilton Manors police dept upside down looking through records and come up w nada. What was your acquaintance's name that took my statement about Ron Eppinger? Is it possible that it wasn't Wilton Manors and maybe it was somewhere else?

I'm really racking my brain about this!! It would be a personal favor to me and I am so very much appreciative of anything you might know!!

Thanks a lot mate!!

Jenna

Sent from my iPhone

Richards, Jason R. From: To: Subject: Re: Hi There Date: Wednesday, August 27, 2014 10:50:27 AM Feel free to reach out to me any time. Take care. Jason ---- Original Message -----From: Robert Giuffre To: Richards, Jason R. Sent: Wed Aug 27 10:46:50 2014 Subject: Re: Hi There Thank you Jason. I hope all has been well for you and yours! All the best, I won't bother you again. Jenna Sent from my iPhone > On Aug 27, 2014, at 10:44 AM, "Richards, Jason R." < Jason.Richards2@ic.fbi.gov> wrote: > Hi Jenna, > My suggestion is for you to do a Freedom of Information Act request (www.foia.gov) for the information you are looking for because I am not able to release information (should there be any) from FBI records. You need to include as many details as possible so they can focus and narrow the search. Explain that you are looking for information related to your recovery as a victim of Ron Eppinger. The process may take some time but it is the appropriate method for you to obtain any possible records regarding your recovery. Hope this helps. > Best wishes, > Jason > -----Original Message-----> From: Robert Giuffre > Sent: Wednesday, August 27, 2014 9:49 AM > To: Richards, Jason R. > Subject: Hi There > G'day Jason, > I know I am a pain in your rear right now and I don't want to be but I am so close to wrapping up an

era, just need a couple dates confirmed is all.

> If you aren't sure about the dates which you have already said that's fine. I have turned the Wilton Manors police dept upside down looking through records and come up w nada. What was your acquaintance's name that took my statement about Ron Eppinger? Is it possible that it wasn't Wilton Manors and maybe it was somewhere else?

> I'm really racking my brain about this!! It would be a personal favor to me and I am so very much appreciative of anything you might know!!

> Thanks a lot mate!! >

> Jenna

> Sent from my iPhone

Case 1:15-cv-07433-LAP Document 1326-4 Filed 01/04/24 Page 6 of 35

From: Robert Giuffre

To: <u>Jason.Richards2@ic.fbi.gov</u>
Subject: Virginia Roberts(Jane doe 102)
Date: Tuesday, April 15, 2014 9:50:31 AM

Hi Jason,

Long time, no talk. I hope all has been well for you and yours!! I am now back in the USA, not too many people know about that and I'd like to keep it that way as my case against Jeffrey Epstein has intensified!! I am here to get this BS non- prosecution agreement thrown out and speaking w Judge Paul Cassal he suggested trying to get ahold of any photos and/or video recordings released by the FBI to assist our case further in proving how much pedophilia occurred by Jeffrey and the many other monsters he obliged w underage girls. If this is a possibility please let me know so I can give you Brad Edwards(my attorney) his contact details. Many thanks for your time and I hope we should meet again.

Kindest Regards, Virginia Roberts Phone

Sent from my iPhone

From: Robert Giuffre

To: <u>christina.pyror@ic.fbi.gov</u>

Subject: Virginia Roberts re: Jeffrey Epstein Case
Date: Wednesday, April 16, 2014 1:52:05 PM

Hi Christina,

I was wondering if you remember me from Sydney Consulate, I am a victim in the investigation from the Jeffrey Epstein case and was wondering if you could tell me if I would be able to get ahold of any of the pics and/or videos that the FBI might have confiscated from any of Epstein's residences? Also can I ask if you might have any of the flight logs that include my name in them to be sent to me as well. It's all for evidential purposes and would prove a many of things to help my case.

Kindest Regards, Virginia Roberts

Sent from my iPhone

Case 1:15-cv-07433-LAP Document 1326-4 Filed 01/04/24 Page 8 of 35

From: on behalf of <u>Sharon Rikard</u>

To: <u>Virginia Giuffre</u>

Subject: Re: Victims Refuse Silence

Date: Saturday, March 28, 2015 9:49:55 AM

Hi Virginia,

So sorry for the late response. Our organization currently works with survivors of sex trafficking provided continuing education, life skills and counseling. We will help with transportation and their basic necessities. Our ultimate goal is a home for domestic minor sex trafficking survivors.

Our contact information is:

doorstofreedom.com

infor@doorstofreedom.com

843-817-0740

I am going to forward your information to our Attorney Generals office as Marie Sazehn has compiled a list of organizations in our state of people/organizations and their involvement in helping survivors.

Thanks for all you are doing to help others!

Blessings, Sharon Rikard

Case 1:15-cv-07433-LAP Document 1326-4 Filed 01/04/24 Page 9 of 35

From: <u>Virginia Giuffre</u>

To:

Victims Refuse Silence

Subject: Date:

Wednesday, March 18, 2015 12:19:06 PM

Hi Sharon,

This is Virginia, we spoke earlier and I just wanted to say thank you for your time and what your doing to help the victims in your area. The mentality has to be changed!! Good luck!!

Kindest Regards, Virginia Roberts

Sent from my iPhone

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter		Action	Page Count	Туре
1	2/12/2015 6:14	Virginia Giuffre	smccawley@bsfllp.com		Email chain with Giuffre, Edwards and Cassell re attorney impressions and legal advice relating to deposition testimony	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
	2/12/2013 0.14	Virginia Giunne	Sinceawiey@bsinp.com		impressions and legal advice relating to deposition testimony	AC Privilege and	withheld	,	III3g
2	2/16/2015 1:05	StanPottinger@aol.com	Smccawley@BSFLLP.com,br ad@pathtojustice.com,		Discussion of evidence among client and attorneys	Work Product/joint defense/commo n interest	Withheld	2	msg
3	2/16/2015 15:37	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	2	meg
3	2/16/2015 15:37	virginia Giuffre	Smccawiey@BSFLLP.com		information provided by client to assist in legal advice	product	withheid		msg
4	2/16/2015 16:15	Sigrid McCawley			Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
5	2/16/2015 16:24	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
6	2/16/2015 16:24	Sigrid McCawley			Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
7	2/21/2015 16:45	Sigrid McCawley	StanPottinger@aol.com,bra d@pathtojustice.com,cassell p@law.utah.edu,robiejenna g@y7mail.com	Smccawley@BSFLLP.com	Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege AC Privilege and Work Product/joint defense/commo	Action	Page Count	Type
8	2/21/2015 16:58	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of evidence among client and attorney	n interest	Withheld	2	msg
9	2/21/2015 17:05	Brad Edwards		StanPottinger@aol.com,cassellp@l aw.utah.edu	Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
10	2/21/2015 17:10	Sigrid McCawley			Discussion of evidence among client and attorney	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
11	2/21/2015 17:16	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
12	2/23/2015 14:21	Sigrid McCawley		StanPottinger@aol.com,brad@pat htojustice.com,cassellp@law.utah. edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
13	2/23/2015 14:29	StanPottinger@aol.com		brad@pathtojustice.com,cassellp@ law.utah.edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
14	2/23/2015 16:01	Virginia Giuffre		StanPottinger@aol.com,brad@pat htojustice.com,cassellp@law.utah. edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg

Log							Privilege		Doc
15	Email Sent Date 2/24/2015 17:51	Email From Sigrid McCawley	Email To	CC Address	Email chain with McCawley, Giuffre, and Paralegals re seeking information to assist in legal advice, with attachment	Type of Privilege AC Privilege and Work Product/joint defense/commo n interest	Withheld	Page Count	Type
16					Attached case research	AC Privilege and Work Product/joint defense/commo n interest	Withheld	14	rtf
17	2/26/2015 12:59	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and legal assistant re legal document, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
18					Attached draft legal document	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	jfif
19	2/28/2015 17:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email with Giuffre, McCawley, Edwards and Henderson re discussion of draft statement	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
20	3/13/2015 17:29	Stan Pottinger		Smccawley@BSFLLP.com,brad@pa thtojustice.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
21	3/13/2015 17:49	Virginia Giuffre	stanpottinger@aol.com		Email chain with Giuffre, Edwards, McCawley and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

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1D 22	3/13/2015 17:56	Email From StanPottinger@aol.com		CC Address Smccawley@BSFLLP.com,brad@pathtojustice.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	Type of Privilege AC Privilege and Work Product/joint defense/commo n interest	Withheld	Page Count	Type
23	3/13/2015 18:00	Brad Edwards	StanPottinger@aol.com	Smccawley@BSFLLP.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
24	3/13/2015 18:24	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	msg
25	3/13/2015 18:25	Virginia Giuffre	StanPottinger@aol.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
26	3/13/2015 21:53	Virginia Giuffre	brad@pathtojustice.com	Smccawley@BSFLLP.com,StanPotti	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	msg
27	3/13/2015 23:38	Brad Edwards			Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	msg
28	3/13/2015 23:40	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
29	3/17/2015 15:20	Virginia Giuffre	Smccawley@BSFLLP.com,br ad@pathtojustice.com,stan pottinger@aol.com		Providing information to assist in legal advice re potential legal action, with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
30	3/17/2015 18:40	Stan	Smccawley@BSFLLP.com,br ad@pathtojustice.com,		Email chain with Giuffre, Edwards, Pottinger and McCawley re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
31	3/17/2015 19:42	Virginia Giuffre	stanpottinger@aol.com		Email chain with Giuffre, Edwards, Pottinger and McCawley re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
32	3/20/2015 15:43	Sigrid McCawley		aortiz@BSFLLP.com,brittany@path tojustice.com	Email chain with Giuffre, Edwards, Henderson, Pottinger, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
33	3/20/2015 15:57	Sigrid McCawley			Providing legal advice re potential deposition	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
34	3/24/2015 21:19	Sigrid McCawley		aortiz@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
35	3/24/2015 21:21	Virginia Giuffre	Smccawley@BSFLLP.com	aortiz@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
36	3/24/2015 21:36	Andres Ortiz	Smccawley@BSFLLP.com,		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
37	3/24/2015 22:21	Virginia Giuffre	aortiz@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	3	msg
38	3/26/2015 2:00	Sigrid McCawley		Smccawley@BSFLLP.com,StanPotti nger@aol.com,brad@pathtojustice .com,brittany@pathtojustice.com,e perez@BSFLLP.com		Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
39	3/26/2015 2:21	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
40	3/26/2015 2:22	Sigrid McCawley			Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg

Log							Privilege		Doc
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41	3/26/2015 3:00	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
42	4/1/2015 21:32	Virginia Giuffre	Smccawley@BSFLLP.com		Giuffre conveying information sought by attorney to assist in legal advice with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
43	4/2/2015 7:01	Brittany Henderson		eperez@BSFLLP.com	Providing draft legal document for client review, with attachment	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
44					Attached Draft legal document	AC Privilege and Work Product/joint defense/commo n interest	Withheld	15	pdf
45	4/3/2015 15:32	Brittany Henderson		brad@pathtojustice.com,eperez@ BSFLLP.com	Email chain with Giuffre, Henderson, Edwards and legal assistant re legal document, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
46					Attached draft legal document	AC Privilege and Work Product/joint defense/commo n interest		15	pdf

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
47	4/8/2015 20:34	Virginia Giuffre	Smccawley@BSFLLP.com		Seeking legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
48	4/9/2015 3:23	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re advice re legal filings, with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
49	4/9/2015 7:16	Sigrid McCawley	StanPottinger@aol.com,bra d@pathtojustice.com	brittany@pathtojustice.com,sperki ns@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
50	4/9/2015 9:26	Brad Edwards	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, and McCawley re legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
51	4/9/2015 9:33	Sigrid McCawley			Email chain with Giuffre and McCawley re legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
52	4/9/2015 12:46	Sigrid McCawley			Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
53					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	14	docx
54					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	12	docx
55					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	docx
56	4/10/2015 14:59	Sigrid McCawley		StanPottinger@aol.com,brad@pat htojustice.com	Providing legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
57	4/10/2015 15:37	Virginia Giuffre	Smccawley@BSFLLP.com		Regarding legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
58	4/10/2015 17:31	Sigrid McCawley		StanPottinger@aol.com,brad@pat htojustice.com,brittany@pathtojus tice.com,eperez@BSFLLP.com	Email chain with Giuffre, McCawley, Henderson, Edwards,	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
59					Attached draft legal document	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	pdf

Log	5 10 10 1						Privilege		Doc
60	Email Sent Date	Email From	Email To	CC Address	Subject Matter Attached draft legal document	Type of Privilege AC Privilege and Work Product/joint defense/commo n interest	Action Withheld	Page Count	Type
61	4/10/2015 17:40	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
62	4/10/2015 19:10	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
63	4/10/2015 19:28	Sigrid McCawley			Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
64	4/10/2015 19:33	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
65	4/10/2015 20:03	Sigrid McCawley			Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
66	4/10/2015 20:04	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS		Withheld	2	msg
67	4/10/2015 20:04	Sigrid McCawley			Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS		Withheld	2	msg
68	4/10/2015 23:46	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley legal assistant re seeking and providing information sought by attorney to assist in providing legal advice, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
69	4/13/2015 13:52	Sigrid McCawley		StanPottinger@aol.com,brad@pat	Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding potential public statements	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
70		Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
71	4/14/2015 23:38	Brad Edwards	Smccawley@BSFLLP.com,bri ttany@pathtojustice.com,ro biejennag@y7mail.com,stan pottinger@aol.com		Providing legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
72	4/16/2015 11:14	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re legal advice regarding media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
73	4/16/2015 11:47	Sigrid McCawley			Email chain with Giuffre and McCawley re legal advice regarding media issues		Withheld	2	msg
74	4/24/2015 19:22	Sigrid McCawley			Providing legal advice re records retention, with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
75					Attached letter providing legal advice re document retention	Attorney Client/joint defense/commo n interest/work product	Withheld	2	pdf
76	4/24/2015 19:59	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re legal advice regarding potential deposition	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
77	4/27/2015 21:20	Brad Edwards		Smccawley@BSFLLP.com	Seeking information to assist in providing legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
78	4/30/2015 6:42	Brittany Henderson		Smccawley@BSFLLP.com,brad@pa thtojustice.com,	Legal documents provided to assist in providing legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
79	4/30/2015 7:02	Brittany Henderson			Email chain with Giuffre, Henderson and paralegal re seeking and providing information to assist in providing legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
80	4/30/2015 7:05	Virginia Giuffre	brittany@pathtojustice.com		Email chain with Giuffre, Henderson, Edwards, McCawley and legal assistant re seeking information to assist in providing legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
81	5/4/2015 20:04	Virginia Giuffre	brittany@pathtojustice.com		Email chain with Giuffre, Henderson, Edwards, McCawley and legal assistant re seeking information to assist in providing legal advice, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
82	5/11/2015 18:20	Sigrid McCawley		Smccawley@BSFLLP.com	Email chain with McCawley, Giuffre, Edwards, Pottinger, Henderson and Paralegal re seeking and providing information to assist in legal advice, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
83	5/11/2015 18:34	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Edwards, Pottinger and Paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
84	5/11/2015 18:40	Sigrid McCawley			Email chain with Giuffre and McCawley re case research, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
85	5/11/2015 18:45	Sigrid McCawley	brad@pathtojustice.com,		Providing and seeking information to assist in legal advice re potential legal action, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
86	5/11/2015 18:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re seeking information to assist in providing legal advice re potential litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
87	5/11/2015 18:56	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, McCawley, Edwards, Pottinger and Paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
88	5/17/2015 22:37	Sigrid McCawley			Providing litigation documents to client, with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	3	msg
89					Attached draft legal agreement	AC Privilege and Work Product/joint defense/commo n interest	Withheld	10	pdf
90	5/17/2015 22:40	Sigrid McCawley			Providing legal advice re legal agreement, with attachment	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
91	5/18/2015 18:40	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of confidential agreement, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
92					Attached confidential agreement page	Attorney Client/joint defense/commo n interest/work product	Withheld	1	jfif
93					Attached confidential agreement page	Attorney Client/joint defense/commo n interest/work product	Withheld	1	jfif
94	6/5/2015 19:16	Sigrid McCawley			Conveying attorney mental impression regarding hearing	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
95	6/6/2015 17:20	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re attorney mental impression regarding hearing	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
96	6/25/2015 2:26	Sigrid McCawley			Providing advice re status and strategy of ongoing legal matters	Attorney Client/joint defense/commo n interest/work product	Withheld	6	msg
97	7/17/2015 14:19	Sigrid McCawley		eperez@BSFLLP.com	Discussion with S. McCawley regarding file related to representation by B. Josefsberg	Attorney Client/joint defense/commo n interest/work product	Withheld	4	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
98	7/27/2015 21:53	Virginia Giuffre	Smccawley@BSFLLP.com		Providing information to assist in legal advice re potential litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
99	7/29/2015 19:45	Sigrid McCawley		StanPottinger@aol.com	Conveying legal advice on media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
100	8/5/2015 19:51	Sigrid McCawley			Email chain with Giuffre, McCawley and paralegals re information sought to assist in providing legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
101	8/6/2015 2:14	Sigrid McCawley			Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
102	8/6/2015 2:45	Sigrid McCawley		brad@pathtojustice.com	Email chain with Giuffre, McCawley, legal intern, Edwards and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
103	8/6/2015 2:55	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
104	8/6/2015 3:48	Sigrid McCawley		Smccawley@BSFLLP.com,brad@pathtojustice.com	Email chain with McCawley, Giuffre, and Paralegals re seeking information to assist in legal advice, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
105	8/6/2015 3:51	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
106	9/1/2015 18:54	Sigrid McCawley		brad@pathtojustice.com,brittany@ pathtojustice.com	Providing and seeking information to assist in legal advice re potential legal action, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
107	9/7/2015 18:24	Virginia Giuffre	brad@pathtojustice.com,sm ccawley@bsfllp.com,stanpot tinger@aol.com		Providing information sought by attorneys to provide legal advice, with attachment	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
108					Attached Information sought by attorneys to provide legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	docx
109	9/7/2015 18:58	Sigrid McCawley	brad@pathtojustice.com,ro biejennag@y7mail.com,stan pottinger@aol.com		Email chain with Giuffre, Edwards, Pottinger and McCawley re collection of information to assist in providing legal advice re potential litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
110	9/15/2015 21:58	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
111	9/15/2015 22:04	Sigrid McCawley			Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
112	9/15/2015 22:07	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
113	9/20/2015 12:15	Sigrid McCawley		brad@pathtojustice.com	Conveying information about potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
114	9/20/2015 14:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
115	9/20/2015 19:16	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
116	9/20/2015 19:29	Sigrid McCawley			Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
						Attorney Client/joint defense/commo n interest/work			
117	9/20/2015 19:30	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	product	Withheld	2	msg
118	9/21/2015 14:48	Sigrid McCawley			Communication re initiation of lawsuit, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
110	0,22,2020					AC Privilege and		-	56
						Work Product/joint defense/commo			
119					Attached draft legal document relating to litigation	n interest	Withheld	12	pdf
120					Attached draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	2	pdf
120					Attached draft legal document relating to hitigation	product	witillielu	2	pui
121					Attached draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	2	pdf
422						Attorney Client/joint defense/commo n interest/work	Wish hold		- 46
122					Attached draft legal document relating to litigation	product	Withheld	3	pdf

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege Attorney Client/joint	Privilege Action	Page Count	Doc Type
123	9/21/2015 14:51	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	defense/commo n interest/work product	Withheld	1	msg
125	other communications	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson (and other, Sigrid McCawley, Meredith Schultz, David Boies, Jack Scarola, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Jack Scarola, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: Jane Doe #1 and Jane Doe #2 v. United States ("CVRA case"), Case no. 08-80736-CIV-Marra, pending in the Southern District of Florida. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the CVRA case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the CVRA case, communications sending or attaching attorney work product related to the CVRA case, and/or communications sending or attaching client revisions to attorney work product related to the CVRA case, and communications re evidence.	AC Privilege and Work Product/joint defense/commo n interest	Withheld	Approx. 1.3K docs overlapping with other cases	

1							Dub-H		D
Log	5 110 10 1						Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
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					Plaintiff has objected that Defendant's requests are overly				İ
					broad and unduly burdensome, as individually logging all				İ
					privileged responsive documents would be overly burdensome.				İ
					Plaintiff contends that requests targeting such privileged				İ
					information are not reasonably calculated to lead to the				İ
					discovery of admissible evidence, are not important to resolving				ĺ
					the issues, are not relevant to any party's claim or defense, are				İ
					not proportional to the needs of the case, and creates a heavy				İ
					burden on Plaintiff that outweighs its benefit. Therefore,				İ
					Plaintiff has employed categorical logging pursuant to Local Civil				İ
		Virginia Giuffre, Brad			Rule 26.2(c). Correspondence re: Giuffre v. Maxwell ("Maxwell				ĺ
		Edwards, Paul Cassell,			case"), 15-cv-07433-RWS, pending in the Southern District of				ĺ
		Brittany Henderson,	Virginia Giuffre, Brad		New York, since the date of filing, September 21, 2015.				ĺ
		Sigrid McCawley,	Edwards, Paul Cassell,		Documents withheld pursuant to the privileges asserted				ĺ
		Meredith Schultz, David	Brittany Henderson, Sigrid		included communications from Ms. Giuffre to the attorneys				ĺ
		Boies, Stephen Zach,	McCawley, Meredith		listed seeking legal advice related to the Maxwell case,				ĺ
		Stan Pottinger, Ellen	Schultz, David Boies,		communications from the attorneys to Ms. Giuffre giving legal				ĺ
		Brockman, Legal	Stephen Zach, Stan		advice or giving attorney mental impressions related to the				ĺ
		Assistants, Professionals	Pottinger, Ellen Brockman,		Maxwell case, communications sending or attaching attorney	AC Privilege and		Approx. 1.3K	1
		retained by attorneys to	Legal Assistants,		work product related to the Maxwell case, and/or	Work		docs	l
	Emails, letters, and	aid in the rendition of	Professionals retained by		communications sending or attaching client revisions to	Product/joint		overlapping	l
		legal advice and	attorneys to aid in the		attorney work product related to the Maxwell case, and	defense/commo		with other	1
126	from 9/21/15 - Present	representation	rendition of legal advice and		communications re evidence.	n interest	Withheld	cases	l

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
									İ
					Plaintiff has objected that Defendant's requests are overly				
					broad and unduly burdensome, as individually logging all				
					privileged responsive documents would be overly burdensome.				
					Plaintiff contends that requests targeting such privileged				
					information are not reasonably calculated to lead to the				1 1
					discovery of admissible evidence, are not important to resolving				1 1
					the issues, are not relevant to any party's claim or defense, are				
					not proportional to the needs of the case, and creates a heavy				
					burden on Plaintiff that outweighs its benefit. Therefore,				1 1
					Plaintiff has employed categorical logging pursuant to Local Civil				1 1
		Virginia Giuffre, Brad			Rule 26.2(c). Correspondence re: Bradley Edwards and Paul				
		Edwards, Paul Cassell,			Cassell v. Alan Dershowitz ("Dershowitz case"), Case no. 15-				
		Brittany Henderson,	Virginia Giuffre, Brad		000072, pending in the Seventeenth Judicial Circuit, Broward				1 1
		Sigrid McCawley,	Edwards, Paul Cassell,		County, Florida. Documents withheld pursuant to the privileges				
		Meredith Schultz, David	Brittany Henderson, Sigrid		asserted included communications from Ms. Giuffre to the				1 1
		Boies, Stephen Zach,	McCawley, Meredith		attorneys listed seeking legal advice related to the Dershowitz				1 1
		Stan Pottinger, Ellen	Schultz, David Boies,		case, communications from the attorneys to Ms. Giuffre giving				
		Brockman, Legal	Stephen Zach, Stan		legal advice or giving attorney mental impressions related to the				
		Assistants, Professionals	Pottinger, Ellen Brockman,		Dershowitz case, communications sending or attaching attorney	_		Approx. 1.3K	
1	Emails, letters, and	retained by attorneys to	Legal Assistants,		work product related to the Dershowitz case, and/or	Work		docs	1
		aid in the rendition of	Professionals retained by		communications sending or attaching client revisions to	Product/joint		overlapping	
	from January 2015 -	legal advice and	attorneys to aid in the		attorney work product related to the Dershowitz case, and	defense/commo		with other	1
127	Present	representation	rendition of legal advice and		communications re evidence.	n interest	Withheld	cases	

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
128	Emails, letters, and other communications from 2009 - Present	Virginia Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and Professionals retained by attorneys to aid in the rendition of legal advice	Virginia Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and Professionals retained by attorneys to aid in the rendition of legal advice		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: Jane Doe No. 102 v. Jeffrey Epstein ("Epstein case"), Case No. 09-80556-CIV-Marra/Johnson (Southern District of Florida). Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the Epstein case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the Epstein case, communications sending or attaching attorney work product related to the Epstein case, and/or communications sending or attaching client revisions to attorney work product related to the Epstein case, and communications re evidence.		Withheld	Approx. 1.3K docs overlapping with other cases	
129	6/10/2015	Virginia Giuffre			Email chain with Giuffre and McCawley seeking information to assist with attorney advice.	Attorney Client	Withheld	2	msg
130	-,,	0 10 00000			Letter from Virginia Giuffre to David Boies conveying requested information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	26	pdf
131	4/30/2015	Brittany Henderson	eperez@BSFLLP.com	Smccawley@BSFLLP.com,brad@pa thtojustice.com,	Communication re VRS registrations	AC Privilege and Work Product	Withheld	1	msg
132	4/29/2015	Andres Ortiz	bh699@nova.edu	Smccawley@BSFLLP.com,brad@pa thtojustice.com,garvin@lclark.edu,	Email chain with McCawley, Edwards, Garvin, Henderson, Giuffre and BSF staff re legal advice re VRS communications.	AC Privilege and Work Product	Withheld	1	msg
133	4/29/2015	brittany henderson		Smccawley@BSFLLP.com,brad@pa thtojustice.com,garvin@lclark.edu,	Communication re legal advice re VRS communications.	AC Privilege and Work Product	Withheld	1	msg

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ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
				Smccawley@BSFLLP.com,brittany	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof,				
	. /. = /2.2.5			@pathtojustice.com,eperez@BSFLL	Henderson, Giuffre and BSF staff re legal advice re VRS	AC Privilege and		_	
134	4/17/2015	Paul Cassell	brad@pathtojustice.com	P.com,	registrations.	Work Product	Withheld	5	msg
				brittany@pathtojustice.com,eperez					
	. /. = /2.2.5	S:	brad@pathtojustice.com,cas	@BSFLLP.com,	Henderson, Giuffre and BSF staff re legal advice re VRS	AC Privilege and			
135	4/17/2015	Sigrid McCawley	sellp@law.utah.edu		registrations.	Work Product	Withheld	4	msg
				Smccawley@BSFLLP.com,brittany	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof,				
				@pathtojustice.com,eperez@BSFLL	Henderson, Giuffre and BSF staff re legal advice re VRS	AC Privilege and			
136	4/17/2015	Brad Edwards	cassellp@law.utah.edu	P.com,	registrations.	Work Product	Withheld	4	msg
407	2/26/2015	Circlet MA-Country			For it shall with Civiffy and McCoulomb and Assisting	A 4 4	Mariah hadal		
137	2/26/2015	Sigrid McCawley			Email chain with Giuffre and McCawley re non-testifying expert.	Attorney Client	Withheld	1	msg
138	2/26/2015	Sigrid McCawley			Communication re non-testifying expert.	Attorney Client	Withheld	1	msg
	2/11/2016	Cincid MacCondon			Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF	A 4 4	D - dt - d	_	
139	2/11/2016	Sigrid McCawley			staff re media communications.	Attorney Client	Redacted	3	msg
	- 1		StanPottinger@aol.com,	Lcarlsen@BSFLLP.com,brad@patht	Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF				
140	2/11/2016	Sigrid McCawley		ojustice.com	staff re media communications.	Attorney Client	Redacted	3	msg
				Lcarlsen@BSFLLP.com,Smccawley					
	- 1	L		@BSFLLP.com,brad@pathtojustice.	Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF				
141	2/11/2016	StanPottinger@aol.com		com	staff re media communications.	Attorney Client	Redacted	3	msg
	- 1- 1				Email chain with Giuffre and Pottinger re media				
142	2/9/2016	StanPottinger@aol.com			communications.	Attorney Client	Redacted	2	msg
					Letter from Virginia Giuffre to David Boies conveying requested	AC Privilege and			
143					information to assist in providing legal advice.	Work Product	Withheld	26	pdf
					Letter from Virginia Giuffre to David Boies conveying requested	AC Privilege and			
144					information to assist in providing legal advice.	Work Product	Withheld	23	docx
4.45	C/10/201E	Viscinia Civiffea			Empil phain with Civiffy and McCoudey to angel - 1th - the	Attaman Cliant	Mish hale		l
145	6/10/2015	Virginia Giuffre			Email chain with Giuffre and McCawley re ongoing litigation.	Attorney Client	Withheld	2	msg
				Smccawley@BSFLLP.com,bh699@n					
l l	. /20 /2015			ova.edu,brad@pathtojustice.com,g	· · · · · · · · · · · · · · · · · · ·			_	
146	4/29/2015	Virginia Giuffre	aortiz@BSFLLP.com	arvin@lclark.edu	BSF staff re VRS communications.	Attorney Client	Withheld	2	msg
					Email chain with Boylan, Giuffre, McCawley, and BSF staff re				
147	4/10/2015	Virginia Giuffre	rebecca.boylan@yahoo.com		legal advice re VRS registrations.	Attorney Client	Withheld	2	msg
148	2/26/2015	Virginia Giuffre	Smccawley@BSFLLP.com		Email confirming legal advice re non-testifying expert.	Attorney Client	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
	2/44/2045	Maria in Civiffor	Charles and a selection		Email chain with Giuffre and Pottinger re media	A 4 4 C.I 4	D - dt - d		
149	2/11/2015	Virginia Giuffre	StanPottinger@aol.com		communications	Attorney Client	Redacted	3	msg
450	2/11/2015	Virginia Giuffre	Con accountant © DCFLLD account		Email chain with Giuffre, McCawley, Pottinger and BSF staff re media communications.	Attaunau Cliant	Redacted	2	
150	2/11/2015	virginia Giunre	Smccawley@BSFLLP.com		media communications.	Attorney Client	Redacted	3	msg
						AC Privilege and			
151	1/13/2015	Virginia Giuffre	StanPottinger@aol.com		Email chain with Pottinger and Giuffre re anticipated litigation.		Withheld	1	mca
131	1/13/2013	Virginia Gianne	Starii ottinger@aoi.com	+	Email chain with rottinger and diame re anticipated intigation.	WorkTroduct	Withinteld	1	msg
					Plaintiff has objected that Defendant's requests are overly				
					broad and unduly burdensome, as individually logging all				
					privileged responsive documents would be overly				
					burdensome. Plaintiff contends that requests targeting				
					such privileged information are not reasonably calculated				
					to lead to the discovery of admissible evidence, are not				
					important to resolving the issues, are not relevant to any				
					party's claim or defense, are not proportional to the				
					needs of the case, and creates a heavy burden on Plaintiff				
					that outweighs its benefit. Therefore, Plaintiff has				
					employed categorical logging pursuant to Local Civil Rule				
					26.2(c). This categorical entry is regarding correspondence				
					re potential legal action against entities and individuals.				
		Virginia Giuffre, Brad			Documents withheld pursuant to the privileges asserted				
		Edwards, Paul Cassell, Brittany Henderson,	Virginia Giuffre, Brad Edwards, Paul Cassell,		included communications from Ms. Giuffre to the				
		Sigrid McCawley,	Brittany Henderson, Sigrid		attorneys listed seeking legal advice related to potential				
		Meredith Schultz, David	McCawley, Meredith		law suits, communications from the attorneys to Ms.				
			Schultz, David Boies,		Giuffre giving legal advice or giving attorney mental				
		Stan Pottinger, Ellen	Stephen Zach, Stan		impressions related to the law suits, communications				
		Brockman, Legal	Pottinger, Ellen Brockman,		sending or attaching attorney work product related to	AC Privilege and			
	Emails, letters, and	Assistants, Professionals	Legal Assistants,		potential lawsuits, and/or communications sending or	Work		Approx. 1.3K	
	other communications	retained by attorneys to	Professionals retained by		attaching client revisions to attorney work product related	Product/joint		overlapping	
	from January 2015 -	aid in the rendition of	attorneys to aid in the		to potential lawsuits, and communications re evidence.	defense/commo		with other	
152	Present	legal advice	rendition of legal advice			n interest	Withheld	cases	

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
153		The law enforcement entity, Virginia Giuffre, David Boies, Stan Pottinger, Sigrid McCawley, Paul Cassell, Brad Edwards	The law enforcement entity, Virginia Giuffre, David Boies, Stan Pottinger, Sigrid McCawley, Paul Cassell, Brad Edwards		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). This categorical entry is regarding correspondence re the currently ongoing criminal investigation of Defendant and others.	Public Interest	Withheld	approx. 57 documents	
154	8/27/2014	Virginia Giuffre	Brad Edwards		Email chain discussing efforts to obtain assistance from FBI agent in obtaining information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	1	msg
155	8/27/2014	Virginia Giuffre	Brad Edwards		Email chain discussing efforts to obtain assistance from FBI agent in obtaining information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	1	msg
156	8/27/2014	Virginia Giuffre	Brad Edwards		Email chain discussing efforts to obtain assistance from FBI agent in obtaining information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	1	msg

C	<u>ase 1:15-cv-07433-LAP</u>	<u>Document 1326-3</u>	Filed 01/04/24	Page 1 of 27	_
	_				
		EXHIB	IT 2		
	_		11 4		

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
1	2/12/2015 6:14	Virginia Giuffre	smccawley@bsfllp.com		Email chain with Giuffre, Edwards and Cassell re attorney impressions and legal advice relating to deposition testimony		Withheld	3	msg
2	2/16/2015 1:05	StanPottinger@aol.com	Smccawley@BSFLLP.com,br ad@pathtojustice.com,robie		Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
3	2/16/2015 15:37	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
4	2/16/2015 16:15	Sigrid McCawley			Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
5	2/16/2015 16:24	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
6	2/16/2015 16:24	Sigrid McCawley			Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
7	2/21/2015 16:45	Sigrid McCawley	StanPottinger@aol.com,bra d@pathtojustice.com,cassell p@law.utah.edu,	Smccawley@BSFLLP.com	Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	<u>CC Address</u>	Subject Matter	Type of Privilege AC Privilege and Work Product/joint defense/commo	Action	Page Count	Type
8	2/21/2015 16:58	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of evidence among client and attorney	n interest	Withheld	2	msg
9	2/21/2015 17:05	Brad Edwards		StanPottinger@aol.com,cassellp@l aw.utah.edu,	Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
		Sigrid McCawley			Discussion of evidence among client and attorney	AC Privilege and Work Product/joint defense/commo n interest	Withheld		
10	2/21/2015 17:10	Sigrid McCawley			Discussion of evidence among client and attorney	 	Withheld	3	msg
11	2/21/2015 17:16	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
12	2/23/2015 14:21	Sigrid McCawley		StanPottinger@aol.com,brad@pat htojustice.com,cassellp@law.utah. edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
13	2/23/2015 14:29	StanPottinger@aol.com		brad@pathtojustice.com,cassellp@ law.utah.edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
14	2/23/2015 16:01	Virginia Giuffre		StanPottinger@aol.com,brad@pat htojustice.com,cassellp@law.utah. edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
15	2/24/2015 17:51	Sigrid McCawley			Email chain with McCawley, Giuffre, and Paralegals re seeking information to assist in legal advice, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	msg
16					Attached case research	AC Privilege and Work Product/joint defense/commo n interest	Withheld	14	rtf
17	2/26/2015 12:59	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and legal assistant re legal document, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
18					Attached draft legal document	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	jfif
19	2/28/2015 17:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email with Giuffre, McCawley, Edwards and Henderson re discussion of draft statement	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
20	3/13/2015 17:29	Stan Pottinger		Smccawley@BSFLLP.com,brad@pa thtojustice.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
21	3/13/2015 17:49	Virginia Giuffre	stanpottinger@aol.com		Email chain with Giuffre, Edwards, McCawley and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
22	3/13/2015 17:56	StanPottinger@aol.com		Smccawley@BSFLLP.com,brad@pa thtojustice.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
23	3/13/2015 18:00	Brad Edwards	StanPottinger@aol.com,	Smccawley@BSFLLP.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
24	3/13/2015 18:24	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	msg
25	3/13/2015 18:25	Virginia Giuffre	StanPottinger@aol.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
26	3/13/2015 21:53	Virginia Giuffre	brad@pathtojustice.com	Smccawley@BSFLLP.com,StanPotti	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	msg
27	3/13/2015 23:38	Brad Edwards			Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	msg
28	3/13/2015 23:40	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
29	3/17/2015 15:20	Virginia Giuffre	Smccawley@BSFLLP.com,br ad@pathtojustice.com,stan pottinger@aol.com		Providing information to assist in legal advice re potential legal action, with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
30	3/17/2015 18:40	Stan	Smccawley@BSFLLP.com,br ad@pathtojustice.com		Email chain with Giuffre, Edwards, Pottinger and McCawley re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
31	3/17/2015 19:42	Virginia Giuffre	stanpottinger@aol.com		Email chain with Giuffre, Edwards, Pottinger and McCawley re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
32	3/20/2015 15:43	Sigrid McCawley		aortiz@BSFLLP.com,brittany@path tojustice.com	Email chain with Giuffre, Edwards, Henderson, Pottinger, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
33	3/20/2015 15:57	Sigrid McCawley			Providing legal advice re potential deposition	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
34	3/24/2015 21:19	Sigrid McCawley		aortiz@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
35	3/24/2015 21:21	Virginia Giuffre	Smccawley@BSFLLP.com	aortiz@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
36	3/24/2015 21:36	Andres Ortiz	Smccawley@BSFLLP.com,		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
37	3/24/2015 22:21	Virginia Giuffre	aortiz@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	3	msg
38	3/26/2015 2:00	Sigrid McCawley		Smccawley@BSFLLP.com,StanPotti nger@aol.com,brad@pathtojustice .com,brittany@pathtojustice.com,e perez@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, Pottinger, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
39	3/26/2015 2:21	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
40	3/26/2015 2:22	Sigrid McCawley			Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
41	3/26/2015 3:00	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
42	4/1/2015 21:32	Virginia Giuffre	Smccawley@BSFLLP.com		Giuffre conveying information sought by attorney to assist in legal advice with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
43	4/2/2015 7:01	Brittany Henderson		eperez@BSFLLP.com	Providing draft legal document for client review, with attachment	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
44					Attached Draft legal document	AC Privilege and Work Product/joint defense/commo n interest	Withheld	15	pdf
45	4/3/2015 15:32	Brittany Henderson		brad@pathtojustice.com,eperez@ BSFLLP.com	Email chain with Giuffre, Henderson, Edwards and legal assistant re legal document, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
46					Attached draft legal document	AC Privilege and Work Product/joint defense/commo n interest		15	pdf

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
47	4/8/2015 20:34	Virginia Giuffre	Smccawley@BSFLLP.com		Seeking legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
48	4/9/2015 3:23	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re advice re legal filings, with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
49	4/9/2015 7:16	Sigrid McCawley		brittany@pathtojustice.com,sperki ns@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
50	4/9/2015 9:26	Brad Edwards	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, and McCawley re legal advice re media issues		Withheld	1	msg
51	4/9/2015 9:33	Sigrid McCawley			Email chain with Giuffre and McCawley re legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
52	4/9/2015 12:46	Sigrid McCawley			Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
53					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	14	docx
54					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	12	docx
55					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	docx
56	4/10/2015 14:59	Sigrid McCawley		StanPottinger@aol.com,brad@pat htojustice.com	Providing legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
57	4/10/2015 15:37	Virginia Giuffre	Smccawley@BSFLLP.com		Regarding legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
58	4/10/2015 17:31	Sigrid McCawley		StanPottinger@aol.com,brad@pat htojustice.com,brittany@pathtojus tice.com,eperez@BSFLLP.com		AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
59					Attached draft legal document	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	pdf

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
						AC Privilege and			
						Work			
						Product/joint defense/commo			
60					Attached draft legal document	n interest	Withheld	21	- df
60					Attached draft legal document	minterest	withheld	21	pdf
						Attorney Client/joint			
						defense/commo			
					Email chain with Giuffre, McCawley and BSF staff regarding legal				
61	4/10/2015 17:40	Virginia Giuffre	Smccawley@BSFLLP.com		advice related to VRS	product	Withheld	2	msg
- 01	1/10/2015 17:10	Virginia Giarric	Sincounicy@ SSI 221 100111		davice related to the	product	· · · · · · · · · · · · · · · · · · ·	-	IIIJg
						Attorney			
						Client/joint			
						defense/commo			
					Email chain with Giuffre, McCawley and BSF staff regarding legal				
62	4/10/2015 19:10	Virginia Giuffre	Smccawley@BSFLLP.com		advice related to VRS		Withheld	2	msg
		_	·			-			
						Attorney			
						Client/joint			
						defense/commo			
					Email chain with Giuffre, McCawley and BSF staff regarding legal	n interest/work			
63	4/10/2015 19:28	Sigrid McCawley			advice related to VRS	product	Withheld	2	msg
						Attorney			
						Client/joint			
						defense/commo			
					Email chain with Giuffre, McCawley and BSF staff regarding legal				1
64	4/10/2015 19:33	Virginia Giuffre	Smccawley@BSFLLP.com		advice related to VRS	product	Withheld	2	msg
						Attorney			1
						Client/joint			1
						defense/commo			
					Email chain with Giuffre, McCawley and BSF staff regarding legal				
65	4/10/2015 20:03	Sigrid McCawley			advice related to VRS	product	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
66	4/10/2015 20:04	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS		Withheld	2	msg
67	4/10/2015 20:04	Sigrid McCawley			Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS		Withheld	2	msg
68	4/10/2015 23:46	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley legal assistant re seeking and providing information sought by attorney to assist in providing legal advice, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
69	4/13/2015 13:52	Sigrid McCawley		StanPottinger@aol.com,brad@pat htojustice.com	Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding potential public statements	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
70		Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
71	4/14/2015 23:38	Brad Edwards	Smccawley@BSFLLP.com,bri ttany@pathtojustice.com, stan pottinger@aol.com		Providing legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
72	4/16/2015 11:14	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re legal advice regarding media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
73	4/16/2015 11:47	Sigrid McCawley			Email chain with Giuffre and McCawley re legal advice regarding media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
74	4/24/2015 19:22	Sigrid McCawley			Providing legal advice re records retention, with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
75					Attached letter providing legal advice re document retention	Attorney Client/joint defense/commo n interest/work product	Withheld	2	pdf
76	4/24/2015 19:59	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re legal advice regarding potential deposition	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
77	4/27/2015 21:20	Brad Edwards		Smccawley@BSFLLP.com	Seeking information to assist in providing legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	7,1	Action	Page Count	Type
78	4/30/2015 6:42	Brittany Henderson		Smccawley@BSFLLP.com,brad@pathtojustice.com,	Legal documents provided to assist in providing legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
79	4/30/2015 7:02	Brittany Henderson			Email chain with Giuffre, Henderson and paralegal re seeking and providing information to assist in providing legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
80	4/30/2015 7:05	Virginia Giuffre	brittany@pathtojustice.com		Email chain with Giuffre, Henderson, Edwards, McCawley and legal assistant re seeking information to assist in providing legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
81	5/4/2015 20:04	Virginia Giuffre	brittany@pathtojustice.com		Email chain with Giuffre, Henderson, Edwards, McCawley and legal assistant re seeking information to assist in providing legal advice, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
82	5/11/2015 18:20	Sigrid McCawley		Smccawley@BSFLLP.com	Email chain with McCawley, Giuffre, Edwards, Pottinger, Henderson and Paralegal re seeking and providing information to assist in legal advice, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
83	5/11/2015 18:34	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Edwards, Pottinger and Paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
84	5/11/2015 18:40	Sigrid McCawley			Email chain with Giuffre and McCawley re case research, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

Log							Privilege		Doc
ID 85	Email Sent Date 5/11/2015 18:45	Email From Sigrid McCawley	Email To brad@pathtojustice.com,	CC Address	Subject Matter Providing and seeking information to assist in legal advice re potential legal action, with attachment	Type of Privilege AC Privilege and Work Product/joint defense/commo n interest	Withheld	Page Count	Type
86	5/11/2015 18:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re seeking information to assist in providing legal advice re potential litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
87	5/11/2015 18:56	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, McCawley, Edwards, Pottinger and Paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
88	5/17/2015 22:37	Sigrid McCawley			Providing litigation documents to client, with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	3	msg
89					Attached draft legal agreement	AC Privilege and Work Product/joint defense/commo n interest	Withheld	10	pdf
90	5/17/2015 22:40	Sigrid McCawley			Providing legal advice re legal agreement, with attachment	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
91	5/18/2015 18:40	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of confidential agreement, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
92					Attached confidential agreement page	Attorney Client/joint defense/commo n interest/work product	Withheld	1	jfif
93					Attached confidential agreement page	Attorney Client/joint defense/commo n interest/work product	Withheld	1	jfif
94	6/5/2015 19:16	Sigrid McCawley			Conveying attorney mental impression regarding hearing	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
95	6/6/2015 17:20	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re attorney mental impression regarding hearing	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
96	6/25/2015 2:26	Sigrid McCawley			Providing advice re status and strategy of ongoing legal matters	Attorney Client/joint defense/commo n interest/work product	Withheld	6	msg
97	7/17/2015 14:19	Sigrid McCawley		eperez@BSFLLP.com	Discussion with S. McCawley regarding file related to representation by B. Josefsberg	Attorney Client/joint defense/commo n interest/work product	Withheld	4	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
98	7/27/2015 21:53	Virginia Giuffre	Smccawley@BSFLLP.com		Providing information to assist in legal advice re potential litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
99	7/29/2015 19:45	Sigrid McCawley		StanPottinger@aol.com	Conveying legal advice on media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
100	8/5/2015 19:51	Sigrid McCawley			Email chain with Giuffre, McCawley and paralegals re information sought to assist in providing legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
101	8/6/2015 2:14	Sigrid McCawley			Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
102	8/6/2015 2:45	Sigrid McCawley		brad@pathtojustice.com	Email chain with Giuffre, McCawley, legal intern, Edwards and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
103	8/6/2015 2:55	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
104	8/6/2015 3:48	Sigrid McCawley		Smccawley@BSFLLP.com,brad@pa thtojustice.com	Email chain with McCawley, Giuffre, and Paralegals re seeking information to assist in legal advice, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
105	8/6/2015 3:51	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
106	9/1/2015 18:54	Sigrid McCawley		brad@pathtojustice.com,brittany@ pathtojustice.com	Providing and seeking information to assist in legal advice re potential legal action, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
107	9/7/2015 18:24	Virginia Giuffre	brad@pathtojustice.com,sm ccawley@bsfllp.com,stanpot tinger@aol.com		Providing information sought by attorneys to provide legal advice, with attachment	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
108					Attached Information sought by attorneys to provide legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	docx
109	9/7/2015 18:58	Sigrid McCawley	brad@pathtojustice.com, stan pottinger@aol.com		Email chain with Giuffre, Edwards, Pottinger and McCawley re collection of information to assist in providing legal advice re potential litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
110	9/15/2015 21:58	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
111	9/15/2015 22:04	Sigrid McCawley			Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
112	9/15/2015 22:07	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
113	9/20/2015 12:15	Sigrid McCawley		brad@pathtojustice.com	Conveying information about potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
114	9/20/2015 14:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
115	9/20/2015 19:16	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
116	9/20/2015 19:29	Sigrid McCawley			Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
						Attorney Client/joint defense/commo n interest/work			
117	9/20/2015 19:30	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action	-	Withheld	2	msg
118	9/21/2015 14:48	Sigrid McCawley			Communication re initiation of lawsuit, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	mra
110	3/21/2013 14.46	Signa iviccawiey			Communication re initiation of lawsuit, with attachments	AC Privilege and	witimeta	1	msg
						Work Product/joint defense/commo			
119					Attached draft legal document relating to litigation	n interest	Withheld	12	pdf
						Attorney Client/joint defense/commo n interest/work			
120					Attached draft legal document relating to litigation	product	Withheld	2	pdf
121					Attached draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	2	pdf
122					Attached draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	3	pdf

Log	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege Attorney Client/joint	Privilege Action	Page Count	Doc Type
123	9/21/2015 14:51	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	defense/commo n interest/work	Withheld	1	msg
125	Emails, letters, and other communications from 2011 - Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson (and other, Sigrid McCawley, Meredith Schultz, David Boies, Jack Scarola, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Jack Scarola, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: Jane Doe #1 and Jane Doe #2 v. United States ("CVRA case"), Case no. 08-80736-CIV-Marra, pending in the Southern District of Florida. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the CVRA case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the CVRA case, communications sending or attaching attorney work product related to the CVRA case, and/or communications sending or attaching client revisions to attorney work product related to the CVRA case, and communications re evidence.	AC Privilege and Work Product/joint defense/commo n interest	Withheld	Approx. 1.3K docs overlapping with other cases	

	1								
Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
					Plaintiff has objected that Defendant's requests are overly				
					broad and unduly burdensome, as individually logging all				
					privileged responsive documents would be overly burdensome.				
					Plaintiff contends that requests targeting such privileged				
					information are not reasonably calculated to lead to the				
					discovery of admissible evidence, are not important to resolving				
					the issues, are not relevant to any party's claim or defense, are				
					not proportional to the needs of the case, and creates a heavy				
					burden on Plaintiff that outweighs its benefit. Therefore,				
					Plaintiff has employed categorical logging pursuant to Local Civil				
		Virginia Giuffre, Brad			Rule 26.2(c). Correspondence re: Giuffre v. Maxwell ("Maxwell				
		Edwards, Paul Cassell,			case"), 15-cv-07433-RWS, pending in the Southern District of				
		Brittany Henderson,	Virginia Giuffre, Brad		New York, since the date of filing, September 21, 2015.				
		Sigrid McCawley,	Edwards, Paul Cassell,		Documents withheld pursuant to the privileges asserted				
		Meredith Schultz, David	Brittany Henderson, Sigrid		included communications from Ms. Giuffre to the attorneys				
		Boies, Stephen Zach,	McCawley, Meredith		listed seeking legal advice related to the Maxwell case,				
		• ,	Schultz, David Boies,		communications from the attorneys to Ms. Giuffre giving legal				
		Brockman, Legal	Stephen Zach, Stan		advice or giving attorney mental impressions related to the				
		Assistants, Professionals	Pottinger, Ellen Brockman,		,	AC Privilege and		Approx. 1.3K	
		, ,	Legal Assistants,			Work		docs	
		aid in the rendition of	Professionals retained by			Product/joint		overlapping	
	other communications		attorneys to aid in the			defense/commo		with other	
126	from 9/21/15 - Present	representation	rendition of legal advice and		communications re evidence.	n interest	Withheld	cases	

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
					Plaintiff has objected that Defendant's requests are overly				
					broad and unduly burdensome, as individually logging all				
					privileged responsive documents would be overly burdensome.				
					Plaintiff contends that requests targeting such privileged				
					information are not reasonably calculated to lead to the				
					discovery of admissible evidence, are not important to resolving				
					the issues, are not relevant to any party's claim or defense, are				
					not proportional to the needs of the case, and creates a heavy				
					burden on Plaintiff that outweighs its benefit. Therefore,				
					Plaintiff has employed categorical logging pursuant to Local Civil				
		Virginia Giuffre, Brad			Rule 26.2(c). Correspondence re: Bradley Edwards and Paul				
		Edwards, Paul Cassell,			Cassell v. Alan Dershowitz ("Dershowitz case"), Case no. 15-				
		Brittany Henderson,	Virginia Giuffre, Brad		000072, pending in the Seventeenth Judicial Circuit, Broward				
		Sigrid McCawley,	Edwards, Paul Cassell,		County, Florida. Documents withheld pursuant to the privileges				
		Meredith Schultz, David	Brittany Henderson, Sigrid		asserted included communications from Ms. Giuffre to the				
			McCawley, Meredith		attorneys listed seeking legal advice related to the Dershowitz				
		• .	Schultz, David Boies,		case, communications from the attorneys to Ms. Giuffre giving				
		Brockman, Legal	Stephen Zach, Stan		legal advice or giving attorney mental impressions related to the				
		Assistants, Professionals	Pottinger, Ellen Brockman,		Dershowitz case, communications sending or attaching attorney			Approx. 1.3K	
		retained by attorneys to	Legal Assistants,		work product related to the Dershowitz case, and/or	Work		docs	
		aid in the rendition of	Professionals retained by		communications sending or attaching client revisions to	Product/joint		overlapping	
	'	legal advice and	attorneys to aid in the		attorney work product related to the Dershowitz case, and	defense/commo		with other	
127	Present	representation	rendition of legal advice and		communications re evidence.	n interest	Withheld	cases	

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
128	Emails, letters, and other communications from 2009 - Present	Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and	Virginia Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and Professionals retained by attorneys to aid in the rendition of legal advice		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: Jane Doe No. 102 v. Jeffrey Epstein ("Epstein case"), Case No. 09-80656-CIV-Marra/Johnson (Southern District of Florida). Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the Epstein case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the Epstein case, communications sending or attaching attorney work product related to the Epstein case, and/or communications sending or attaching client revisions to attorney work product related to the Epstein case, and communications re evidence.		Withheld	Approx. 1.3K docs overlapping with other cases	
129	6/10/2015	Virginia Giuffre			Email chain with Giuffre and McCawley seeking information to assist with attorney advice.	Attorney Client	Withheld	2	msg
130					Letter from Virginia Giuffre to David Boies conveying requested information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	26	pdf
131	4/30/2015	Brittany Henderson	eperez@BSFLLP.com	Smccawley@BSFLLP.com,brad@pa thtojustice.com,	Communication re VRS registrations	AC Privilege and Work Product	Withheld	1	msg
132	4/29/2015	Andres Ortiz	bh699@nova.edu	Smccawley@BSFLLP.com,brad@pa thtojustice.com,garvin@lclark.edu,	Email chain with McCawley, Edwards, Garvin, Henderson, Giuffre and BSF staff re legal advice re VRS communications.	AC Privilege and Work Product	Withheld	1	msg
133	4/29/2015	brittany henderson	aortiz@BSFLLP.com	Smccawley@BSFLLP.com,brad@pa thtojustice.com,garvin@lclark.edu,	Communication re legal advice re VRS communications.	AC Privilege and Work Product	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
				Smccawley@BSFLLP.com,brittany	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof,				
				@pathtojustice.com,eperez@BSFLL	Henderson, Giuffre and BSF staff re legal advice re VRS	AC Privilege and			
134	4/17/2015	Paul Cassell	brad@pathtojustice.com	P.com,	registrations.	Work Product	Withheld	5	msg
				brittany@pathtojustice.com,eperez	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof,				
			brad@pathtojustice.com,cas	@BSFLLP.com,	Henderson, Giuffre and BSF staff re legal advice re VRS	AC Privilege and			
135	4/17/2015	Sigrid McCawley	sellp@law.utah.edu		registrations.	Work Product	Withheld	4	msg
				Smccawley@BSFLLP.com,brittany	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof,				
				@pathtojustice.com,eperez@BSFLL	Henderson, Giuffre and BSF staff re legal advice re VRS	AC Privilege and			
136	4/17/2015	Brad Edwards	cassellp@law.utah.edu	P.com,	registrations.	Work Product	Withheld	4	msg
									T
137	2/26/2015	Sigrid McCawley			Email chain with Giuffre and McCawley re non-testifying expert.	Attorney Client	Withheld	1	msg
138	2/26/2015	Sigrid McCawley			Communication re non-testifying expert.	Attorney Client	Withheld	1	msg
					Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF				
139	2/11/2016	Sigrid McCawley			staff re media communications.	Attorney Client	Redacted	3	msg
			StanPottinger@aol.com	Lcarlsen@BSFLLP.com,brad@patht	Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF				
140	2/11/2016	Sigrid McCawley		ojustice.com	staff re media communications.	Attorney Client	Redacted	3	msg
				Lcarlsen@BSFLLP.com,Smccawley					
				@BSFLLP.com,brad@pathtojustice.	Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF				
141	2/11/2016	StanPottinger@aol.com		com	staff re media communications.	Attorney Client	Redacted	3	msg
					Email chain with Giuffre and Pottinger re media				
142	2/9/2016	StanPottinger@aol.com			communications.	Attorney Client	Redacted	2	msg
					Letter from Virginia Giuffre to David Boies conveying requested	AC Privilege and			
143					information to assist in providing legal advice.	Work Product	Withheld	26	pdf
					Letter from Virginia Giuffre to David Boies conveying requested	AC Privilege and			
144					information to assist in providing legal advice.	Work Product	Withheld	23	docx
									1
145	6/10/2015	Virginia Giuffre			Email chain with Giuffre and McCawley re ongoing litigation.	Attorney Client	Withheld	2	msg
				Smccawley@BSFLLP.com,bh699@n					
				ova.edu,brad@pathtojustice.com,g					1
146	4/29/2015	Virginia Giuffre	aortiz@BSFLLP.com	arvin@lclark.edu	BSF staff re VRS communications.	Attorney Client	Withheld	2	msg
1 T					Email chain with Boylan, Giuffre, McCawley, and BSF staff re				
147	4/10/2015	Virginia Giuffre	rebecca.boylan@yahoo.com		legal advice re VRS registrations.	Attorney Client	Withheld	2	msg
148	2/26/2015	Virginia Giuffre	Smccawley@BSFLLP.com		Email confirming legal advice re non-testifying expert.	Attorney Client	Withheld	1	msg

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
	- 4				Email chain with Giuffre and Pottinger re media				
149	2/11/2015	Virginia Giuffre	StanPottinger@aol.com		communications	Attorney Client	Redacted	3	msg
	2/44/2045				Email chain with Giuffre, McCawley, Pottinger and BSF staff re			_	
150	2/11/2015	Virginia Giuffre	Smccawley@BSFLLP.com		media communications.	Attorney Client	Redacted	3	msg
						AC Privilege and			
151	1/13/2015	Virginia Giuffre	StanPottinger@aol.com		Email chain with Pottinger and Giuffre re anticipated litigation.	Work Product	Withheld		
151	1/13/2013	viigiilla diullie	Staff Ottinger @aoi.com		Email Chain with Pottinger and Glume re anticipated itigation.	WOIK FIOUUCE	witillelu	1	msg
					Plaintiff has objected that Defendant's requests are overly				
					broad and unduly burdensome, as individually logging all				
					privileged responsive documents would be overly				
					burdensome. Plaintiff contends that requests targeting				
					such privileged information are not reasonably calculated				
					to lead to the discovery of admissible evidence, are not				
					important to resolving the issues, are not relevant to any				
					party's claim or defense, are not proportional to the				
					needs of the case, and creates a heavy burden on Plaintiff				
					that outweighs its benefit. Therefore, Plaintiff has				
					employed categorical logging pursuant to Local Civil Rule				
					26.2(c). This categorical entry is regarding correspondence				
					re potential legal action against entities and individuals.				
		Virginia Giuffre, Brad			Documents withheld pursuant to the privileges asserted				
		Edwards, Paul Cassell,	Virginia Giuffre, Brad		included communications from Ms. Giuffre to the				
		Brittany Henderson,	Edwards, Paul Cassell,		attorneys listed seeking legal advice related to potential				
		Sigrid McCawley,	Brittany Henderson, Sigrid		law suits, communications from the attorneys to Ms.				
		Meredith Schultz, David	McCawley, Meredith		Giuffre giving legal advice or giving attorney mental				
		Boies, Stephen Zach,	Schultz, David Boies,		impressions related to the law suits, communications				
		Stan Pottinger, Ellen	Stephen Zach, Stan		sending or attaching attorney work product related to				
	For all a latter and	Brockman, Legal	Pottinger, Ellen Brockman,		potential lawsuits, and/or communications sending or	AC Privilege and Work		4 4 21/	
	Emails, letters, and	Assistants, Professionals	Legal Assistants,		attaching client revisions to attorney work product related			Approx. 1.3K	
	other communications from January 2015 -	retained by attorneys to aid in the rendition of	Professionals retained by attorneys to aid in the		to potential lawsuits, and communications re evidence.	Product/joint defense/commo		overlapping with other	
152	Present	legal advice	rendition of legal advice		to potential lawsuits, and communications re evidence.	n interest	Withheld	cases	
152	Present	iegai duvice	renultion of legal advice	1]	minterest	withheid	cases	Ь

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
153	Email and letter	The law enforcement entity, Virginia Giuffre, David Boies, Stan Pottinger, Sigrid McCawley, Paul Cassell, Brad Edwards	The law enforcement entity, Virginia Giuffre, David Boies, Stan Pottinger, Sigrid McCawley, Paul Cassell, Brad Edwards		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). This categorical entry is regarding correspondence re the currently ongoing criminal investigation of Defendant and others.		Withheld	approx. 57 documents	

 Case 1:15-cv-07433-LAP
EXHIBIT 1

Case 1:15-cv-07433-LAP Document 1326-2 Filed 01/04/24 Page 2 of 3

From: Sent: jeffrey E. <jeevacation@gmail.com> Monday, January 12, 2015 10:03 AM

To:

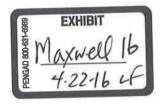
Gmax

you can issue a reward to any of virginias friends acquaionts family that come forward and help prove her allegations are false the strongest is the clinton dinner, and the new version in the virgin isalnds that stven hawking partica-ted in an underage orgy

please note

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From:

Ross Gow <

Sent:

Tuesday, February 24, 2015 3:36 AM

To:

G Max; Philip Barden

Subject:

VR cried rape - prior case dismissed as prosecutors found her 'not credible'

Ghislaine

Some helpful leakage...

In today's Daily Mail print edition and on web www.dailymail.co.uk/news/article-2965360/Prince-Andrew-s-sex-slave-accused-two-teens-rape-three-years-joined-Jeffrey-Epstein-s-harem.html

and

www.nydailynews.com/news/world/sex-slave-prince-andrew-accused-2-men-rape-1998-article-1.2125569

Mom told a detective "about her daughter's past drug abuse and also how many kids in Royal Palm Beach are involved in drugs, witchcraft and animal sacrifice," according to a confidential report by the Palm Beach County Sheriff's Office.

best

Ross

Ross Gow Managing Partner ACUITY Reputation 23 Berkeley Square London W1J 6HE

mob

+7 903 363 5393 Москва Мобильный

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Cases 1: 15-6 v: 074233 LAR/S Document 1826-1. Fillet 001/04/04 P. Rage 1 f 0545
EXHIBIT 7
PART 2
PARI Z

Case 1:15-ev-07433-PAPS Document 1376-8 Filed 04/24/26 Page 2 of 45

Date: 7/19/06 PALM BEACH POLICE DEPARTMENT Page: 45
Fime: 15:01:37 Incident Report Program: CMS301L

lase No. . . : 1-05-000368 (Continued) photographed by CSI Pavlik and then videotaped by myself. The search was concluded at approximately 3:05 p.m. whereupon Detective Recarey and I were the last two officers in the house. Upon securing the residence we met with the gentleman who identified himself to Detective Recarey as the lawyer for the defendant and he was informed that the residence was secured and that copies of the inventory return had been left on the first floor table of the personal assistant's office.

Detective Recarey and I returned to Police Headquarters and secured for the day.

On October 20, 2005, I assisted Defective Recarey in the execution of a search warrant at 358 El Brillo Way, Palm Beach, Florida, 33480.

Upon the announcement of the search warrant, immediate contact was made with three white males who came out of the house or surrounding structures. Those males were identified as Janusz Banasiak, Daniel Estes, and Mark Zeff. As other members of the police department cleared the home, I kept watch over these three males. Once the house was cleared, those males were turned over to Detective Recarey.

Detective Dicks and I were assigned to assist in the search of the main house, the cabana and the servant's quarters. We started in the garage. All areas of the garage were searched to include four vehicles. These vehicles were three black Mercedes Benz cars registered to Jeffrey Epstein. The fourth vehicle was a Harley Davidson motorcycle, green in color, registered to Jeffrey Epstein. Nothing was recovered from the garage.

A towel closet and pantry located off the kitchen were searched and yielded negative results.

The kitchen was searched and taken into evidence was a phone message book that was located near a house phone.

North of the kitchen was an office room which contained a computer. The room had a closet that contained a locked gun locker. The combination was entered by Banasiak in the presence of Sgt. Frick and the safe was opened. Items were taken from the room. See the completed property receipt for a detailed list.

A green bathroom located on the first floor was searched and nothing was taken.

A closet located just west of the green bathroom was searched. Two massage tables were located in the closet along with a photo of a nude

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lase No. . . : 1-05-000368 (Continued) female from the waist up. See the property receipt for details.

I searched two bedrooms and their adjoining bathrooms, which were located on the second floor on the East side of the house. In the Northeast bedroom closet I found adult sex toys called Twin Torpedoes. Soap made in the shape of a penis and vagina were also found in these upstair bedrooms. See the property receipt for details.

I searched the pool cabana located on the South side of the pool. Photos were taken from the wall. See the property receipt for details.

I assisted in the search of Banasiak's living quarters. Numerous CD s along with a message book was seized. See the property receipt for details.

On November 1, 2005, I was contacted by Atty. Gus Fronstin, who advised he was willing to assist with the investigation. Atty. Fronstin advised he would try to have his client, Jeffrey Epstein available to be interviewed. I explained I would be interested in conducting an interview with his client as well as other employees that are employed within the house. Atty. Fronstin advised he would return my call once he received confirmation on the interviews.

On November 6, 2005, I attempted contact with the state of the residence. I left a business card for her to return my call. Upon returning to the police department, I had received a telephone call from the state of the station to some with the state of the station to provide an interview. At approximately 3:30 pm, she arrived at the Palm Beach Police Station with her boyfriend. Her boyfriend was allowed to sit in the lobby area while Ms. was interviewed.

I took Ms to the Detective Bureau Interview room. I closed the door for privacy and explained to her that I appreciated her coming to the police station for the interview. During the sworn taped statement, she advised she was at Jeffrey Epstein s house one time. Approximately two months ago, she was approached by a girl, who was dating her roommate, to make some quick money. advised she was in need to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by that the massage would have to be done in her underwear. She advised drove with her and brought her into the house. They walked into the kitchen area and took the stairs upstairs. further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and

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ase No. . . : 1-05-000368

introduced himself as Jeff. advised she recalled she and removed their clothing down to their panties, Epstein lay on his stomach area and they provided a massage on his legs and feet area. I asked if she had any formal massage training and she replied no. advised she was topless and the panties she wore were the boy shorts lace panties. She and continued the massage until the last ten minutes of the massage, Epstein, told to leave the room so that could finish the massage.

got dressed and Epstein turned over onto his back. Epstein then removed the towel, which had been around his waist. Epstein laid there naked and requested that the rub his chest area. Stated as she did this, Epstein, began masturbating as she rubbed his chest. Stated he pulled down her boy short panties and he produced a large white vibrator with a large head. She stated it was within a drawer in his master bathroom. He rubbed the vibrator on her vagina area. Advised he never penetrated her vagina with the vibrator.

He continued to rub her vagina with the vibrator as he continued to masturbate. Stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. Got dressed and met with him him the kitchen area. Epstein came into the kitchen and provided \$200.00 for bringing and paid \$200.00 to for providing the massage. Was told to leave her telephone number with Sarah, his assistant for future contact. Provided her cellular telephone number for future contact. Was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by Sarah for her to return to work for Epstein. Stated work is the term used by Sarah to provide the massage in underwear. Advised she declined, as she was not comfortable in providing that type of work. The interview was concluded and the videotape was placed into evidence.

Investigation Continues ..

On November 7, 2005, I made telephone contact with advised she would be able to meet with me at her home. Det. Sandman and I traveled to her home in and made contact with buring a sworn taped statement, stated she met Jeffrey Epstein through Haley Robson. Robson would approach females who wished to work for him. stated she was asked to work for him but declined. explained that work means give massages. She was asked about any formal training in providing massages to which she said no. said she accompanied Robson and other females

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ase No. . . : 1-05-000368 who were taken to Epstein s house to provide massages. further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied Robson with the latest the 14-year-old victim, and Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. It was also told that should Epstein require them to do anything extra and they were not comfortable just to tell him and he would stop. stated Robson received \$200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, the victim, as she stated she was fifteen years old at the most; she looked really young. Turther stated each time she went to the house, she sat in the kitchen and waited with Robson until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. stated there were a lot of naked girls in photographs throughout the house. The interview was concluded and the tape was turned into evidence.

Investigation Continues ..

I left my business card at her front door. Ms returned my call and arranged a meeting with me at the Palm Beach Police Department for November 8, 2005. At approximately 2:00pm, arrived at the Palm Beach Police Department. She was brought into the interview room and the door was closed for privacy. She was told that I appreciated her coming to the police station for questioning regarding an on going investigation. She was told that I was investigating a crime involving Jeffrey Epstein and knew, based on the investigation, that she had encounters with him in the past. During a sworn taped statement, stated she had met Epstein approximately two years ago. She was first introduced to Epstein by Haley Robson. Robson approached her about working for Epstein and providing a massage to him for \$200.00. The arrangements were made and as Robson could not take her the day the arrangements were made, took also attended and was familiar with Epstein.

recalled she was brought there and entered through the back kitchen door. She had met with an assistant Sarah and another assistant Adrianna. Sarah brought her upstairs as she observed several photographs of naked females throughout the house. stated Epstein came in the room, wearing only a towel, and laid on the table. Stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. stated that on the first massage she provided she did not remove her

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Case No. . . : 1-05-000368 (Continued) clothing. stated she had returned several times after that. Each time she returned more things happened. stated that the same thing would happen. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. stated she was unsure if he climaxed as he masturbated under the towel. Additionally she never looked blow his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color with a large head, on her. Every time she provided a massage he would masturbate. added she has no formal training in providing a massage. Stated she brought two females during her visits to provide massages. stated she brought a girl named and from from stated she received \$200.00 for each girl she brought. Additionally, was given \$200.00 for taking her in the very beginning. The interview was concluded and the tape was placed into evidence.

Investigation continues...

On November 8, 2005, I made telephone contact with W/F, at her residence, responded to the police station for an interview reference an ongoing investigation. At approximately 2:30 pm, she arrived at the Palm Beach Police Station and was brought into the interview room for the interview. The door was closed for privacy and she was told that I appreciated her cooperation in this case. During a sworn taped statement, stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as had asked her if she wanted to make money providing massages to Epstein. had heard that several girls from were doing this and making money. She agreed and was taken to the house by had introduced her to Sarah and Epstein and brought her upstairs to a master bedroom and Master bathroom where a massage table was prepared and the proper oils were taken out. Teft the room and waited downstairs for stated Epstein entered the room wearing a towel and she provided a massage wearing only her thong panties. advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed; once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid \$200.00 for providing the massage. She also stated received \$200.00 for bring to Epstein.

stated she had gone a total of 15 times to his residence to provide a massage and things had escalated from just providing a

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Continued)
massage. Epstein began touching her on her buttocks and grabbed her
closer to him as he masturbated. Epstein also grabbed her breasts and
fondled her breast with his hands as she provided the massage.

stated on one occasion, he offered extra monies to have vaginal
intercourse. She stated this all occurred on the massage table.

stated Epstein penetrated her vagina with his penis and began
having intercourse with her until he reached the point of climax.
Epstein removed his penis from her vagina and climaxed onto the
massage table.

received \$350.00 for her massage. I asked her
if she had any formal training in providing massages,
stated she
did not.

continued to state on one other occasion, Epstein introduced his assistant, Nada, into the massage. Nada was brought into room with to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein introduced the large white vibrator/massager during the massage. Epstein stroked the vibrator/massager on vagina as she provided the massage.

stated the last time she spoke with anyone at the house, was with Sarah during the weekend of October 2 or 3, 2005. Stated she had brought two people to the Epstein house. She provided the names of and and (unknown last name). It should noted, had been previously identified as and had been previously interviewed. The interview was concluded and the videotape was placed into evidence via the locker system.

On November 9, 2005, Sgt Frick and I traveled to 6791 Fairway Lakes Drive in Boynton Beach, Florida in hopes to interview Juan Alessi, the former houseman of Epstein's home. As no one was home, a business card was left for him to return my call. We then traveled to 11349 SW 86th Lane in Miami in hopes to interview Alfredo Rodriguez, a former house man of Epstein. We did not locate them at home. I left a business card for him to return my call.

We then traveled to and met with Dean of Students, Mr.

We requested to speak with was re interviewed, as she still was in possession of the rental car that Epstein had acquired for her. Stated that Sarah, Epstein's assistant, had called her on her cellular telephone and informed her that rental was extended for her. Sarah stated she had paid an additional \$625.00 for her to keep the rental an extra month. was asked if she had any additional contact with either Epstein or anyone from his organization. Stated she did not, other than the telephone call informing her that she could keep the car for an extra month.

Odid not provide any additional information.

On November 10, 2005, at approximately 9:47 am, Alfredo Rodriguez had telephoned reference my business card found on his door. Rodriguez stated he had worked with Epstein for approximately six months after

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ase No. . . : 1-05-000368 (Continued) the previous houseman left. Rodriguez stated that it was his responsibility to keep the identity of the masseuses private. Mr. Epstein had a massage in the morning and one in the afternoon. Mr. Rodriguez stated he would rather speak about this in private. He advised he would come to the police station to speak with me. Rodriguez stated he would return my call on Monday, November 14, 2005.

I then made telephone contact with Juan Alessi. He advised he found my card on his door and wanted to know what I needed to speak with him about. I explained to Alessi that I was conducting an investigation on his former employer, Mr. Epstein. Alessi stated he would return my call shortly as he was in the middle of a project at his home. I received a telephone call from Attorney Donald Morrell from 686-2700. Mr. Morrell stated he represented Mr. Alessi and did not want me speaking with his client. I then made telephone contact with the State Attorney's Office and confirmed that subpoenas would be issued to the former employees to assist in the investigation.

I then made telephone contact with Attorney Guy Fronstin, attorney for Mr. Epstein. I explained to Mr. Fronstin that I would like to speak with Mr. Epstein. He stated Mr. Epstein is not in residence in Florida at this time and would check with him to ascertain if he could be here by Wednesday November 16, 2005 for an interview. Mr. Fronstin stated he would return my call should Mr. Epstein decide to come in to the police station for an interview.

Investigation continues.

On November 14, 2005, Det. Sandman and I traveled to sin and spoke with She was told of the ongoing investigation involving Epstein. advised she had gone to the house on several occasions. During a sworn taped statement, she advised she started going to the house approximately one year ago and was brought by (Unknown last name). stated brought her into the house and she was introduced to a girl named Sarah. Once she met her, Sarah brought her upstairs into a master bedroom bathroom. Stated she met Jeffrey in the bathroom. He lay on the table and picked the massage oils. She provided the massage, as he lay naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her \$300.00 for the massage.

stated she had only been at the house approximately five or six times. Said each time she went to the house she was notified by Sarah, Epstein's assistant, that Epstein was in town and would like her to work. Stated she returned to the house and was again led upstairs by Sarah. She provided the massage, clothed.

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advised it wasn't really weird until later on was asked if she ever removed her clothing to provide a massage. stated it was not until the third time she went that she removed her clothing. Is stated she was notified by Sarah that Epstein wanted her to come to work. She arrived at the house and was led upstairs by Sarah. She started providing the massage when Epstein asked her to remove her clothing. I removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. I stated she knew he was masturbating himself as she providing the massage. I stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. I stated once the breathing relaxed he got up and told her to get dressed. She was paid \$300.00 for her services.

was notified by Sarah to come to the house and work. Stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel as he entered the room to lie on the table. Stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. Stated her boyfriend was in the car waiting for her. Stated that Epstein got upset, as she wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. I asked her if she had any contact with Epstein's organization, she stated she received \$200.00 from Western Union in Royal Palm Beach and Okeechobee Blvd as a Christmas gift. Advised she had no formal training in provide any massages. Also stated she was sixteen years old when she first went to Epstein's house.

At approximately 4:22 pm, I made telephone contact with the at a public place. I suggested she come to the police station for an interview. I did not want to meet at the police station. I recommended we meet at the Palm Beach Gardens Mall in the food court area. She agreed and an appointment was made for November 15, 2005 at 5:00 pm at the food court.

Investigations Continue.

On 10/20/2005, I assisted executing a search warrant at 358 El Brillo Way in the Town of Palm Beach, Palm Beach County Florida under the direction of affiant Detective Joe Recarey.

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(Continued)

Detective Melnichok and I searched the pantry room that is west next to the kitchen. This room had all white cabinets with a dark grey and black counter top. We did not find anything in this room.

We searched the yellow and blue room that is west next to the pantry room. This room had a very large statue of man with a bow. Taken into evidence from this room were nine photographs in frames of various women.

We searched the main entrance foyer that is to the north of the yellow and blue room. This room contained two bamboo chairs and ottomans with cushions. It also contained a round table with numerous books.

We searched another blue room that is west of the foyer. This room had a stereo system and book shelves that were from the floor to the ceiling. Taken into evidence from this room were eight photographs in frames of various women and/or Epstein, the owner of the residence.

We searched the room to the west of the blue room that has sliding glass doors that lead out to the pool. In this room in a dresser were two DVD's and two VCR tapes. These items were taken into evidence.

We searched a 2004 black Chevy Suburban bearing Florida tag X99-EGL, registered to Jeffrey Epstein DOB 01/20/53, which was located on the east side of the driveway facing south. I found a Thrifty rental agreement between the passenger seat and the middle console. The name on the rental agreement was Johanna Sjoberg from 622 Holly Drive Palm Beach Gardens, Florida 33410. The phone number on the rental agreement was ________. The vehicle rented was a white 2005 Chrysler Sebring bearing Florida tag W99-FUN. The vehicle was rented on 9/25/05 at 17:58 hours and was returned on 9/26/05 at 16:52 hours. The last four numbers of the credit card used are 9821. Detective Melnichok found a piece of paper in the middle console that said I used the cash in here to fill up the tank and was signed by Johanna.

I searched the 2005 black Cadillac Escalade ESV bearing Florida tag Q29-9GT, registered to Jeffrey Epstein dob 01/20/53, which was located on the west side of the driveway facing south. I did not find anything in this vehicle.

All of the items that were taken into evidence were photographed in the place they were located and then turned over to crime scene.

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During a sworn taped statement, stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by who informed her that she could make monies providing a massage to Epstein for \$200.00. that she would have to provide this massage topless. - made the arrangements with Epstein and his assistants and took to the house. stated and she entered through a glass door that led into a kitchen. took her upstairs, to a master bedroom and master bathroom. She recalled the bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. and removed their clothing remaining only in thong underwear. She further stated that Epstein lay on his chest on the table. Epstein selected which oils to use for the massage. Both and provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested wait downstairs in the kitchen area for Epstein instructed to finish the massage. As got dressed, starting rubbing his chest. left the room, and Epstein began masturbating himself as rubbed Epstein s chest. stated he continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel, he instructed the massage was done and to get dressed and met with him downstairs. got dressed and met with Epstein in the kitchen area. She was paid \$200.00 dollars for providing the massage. stated she was aware that also received monies for the same thing.

The second time she went to the house she was again approached by asked if she wanted to return to the house to provide another massage; agreed and the arrangements were made by for her to return to the house. Stated drove her to the house and knocked on the same glass door that leads to the kitchen area. They were allowed entry into the house by one of the staff members. Led her upstairs to the master bedroom and

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master bathroom area. left this time to do the massage alone. Epstein entered the room again wearing only a towel. began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He lay on the table on his stomach as began massaging his legs and back.

As finished with Epstein's back and legs, Epstein then turned over onto his back. started to rub his chest and he began masturbating himself. As rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing vagina and masturbating himself at the same time. stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large, grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. stated he climaxed onto the towel again and informed her that the massage was done. She received \$200.00 for the massage. she never returned to the house and had no desire to return to the house. was asked if she received any formal massage training. She advised she had no formal training. was asked if Epstein knew her real age. stated he knew as he asked her questions about herself and high school. He was aware she attended and is still attending

The interview was concluded. I suggested inform her parents of what occurred at the Epstein house. Stated she would tell her father as he was unaware this had occurred. I left my business card for any questions they may have. We left the area and returned to the police station. The tape was placed into evidence.

Investigation Continues.

I asked how she was introduced to Epstein. Stated she did not want to disclose who brought her to the house but she would

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respond to any other questions. When I asked her what happened at the house, stated everything happened. It all began with the massages. Each time she went more things happened. She would massage Epstein and he would masturbate and climax. She stated things escalated from there. She provided oral sex on Epstein and he provided oral sex on her. She stated he would also use a massager/vibrator on her vagina to stimulate her as she massaged him. He introduced his assistant Nadia or Nada to have vaginal intercourse with She stated Nada or Nadia would utilize a strap-on (synthetic penis) to have intercourse with her. She was told to masturbate herself as Epstein and Nada had sexual intercourse. All this was done at Epstein's direction.

many times. Stated Epstein inserted his fingers in her vagina to stimulate her as she massaged him. When I asked her if there had been any vaginal intercourse with Epstein, she stated she did not have sex with him. She did admit having sex with Nada, his assistant.

Stated not every time she went involved sexual favors.

Sometimes she would just talk with him and get paid. I asked her how much she was paid each time she went to Epstein s residence.

Stated she got paid \$300.00 every time she went to the house. She was told to bring other girls to him to provide massages.

Contact the house of the state of the house of the house of the house of the state of the house of the

I showed a photo line up in which Nada Marcinkova was placed in position six. She reviewed the six photographs and immediately identified Nada Marcinkova as the person with whom she had intercourse. Additionally, it was the same person she watched have intercourse with Epstein. She signed the photo line-up under Nada Marcinkova s photo as the person she identified. We then left the mall and returned to the police station. The photo line up and tape were placed in to evidence.

Investigation Continues...

On November 17, 2005, I received a phone message from Atty. Guy Fronstin who advised to call his cellular phone reference his client Jeffrey Epstein. I telephoned his cell phone and left a message for him to return my call. I did not receive a call back on Thursday, November 17, 2005. On Friday, November 18 2005, I retrieved another voice mail from my work phone from Mr. Fronstin advising he would not produce his client Jeffrey Epstein for any statement. Fronstin stated he had spoken with ASA Lana Belohlavek and expressed Mr. Epstein has a passion for massages. I called ASA Lana Belohlavek and confirmed that

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 Fronstin had telephoned her reference this case. Although nothing was
 discussed, Mr. Fronstin did advise her that Epstein is very passionate
 about massages.

I also spoke with ASA Daliah Weiss reference the previous employees, Juan and Maria Alessi. She advised that they had been served through a subpoena process server. They were both scheduled to appear on Monday November 21, 2005 at 12:00 p.m.

On November 21, 2005, I met with ASA Weiss, Atty. Donnie Murrell and Juan and Maria Alessi at the State Attorney Office. ASA Weiss had requested a court reporter to be present to take the statement of the Alessi s. I spoke with Maria Alessi, in the presence of her attorney, Donnie Murrell. She advised she had worked for Epstein for eight years, from the period of 1994 through 2002. She advised she had never had any direct conversations with him. She stated it was her husband who spoke directly with Epstein. Her work consisted of doing house cleaning, shopping and other preparations when Epstein would arrive in town. Alessi stated the preparations consisted of preparing the house and bathrooms for his arrival. She advised she did view several masseuses that arrived at the house. She advised that two or three girls would come during a day and provide the massages. The girls that arrived looked young in age. Mrs. Alessi did not know any of the girls personally and were always different. She was told that when Epstein was in residence he did not want to encounter the Alessis during his stay in Palm Beach.

I then spoke with Mr. Alessi in the presence of his attorney, Donnie Murrell. Mr. Alessi stated that he was employed for eleven years with Mr. Epstein. He originally was hired as a part time employee and then moved up into a full time position. His duties included everything. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein's arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. He remembered dealing with his girlfriend, Ms. Maxwell originally and then dealt with Epstein directly.

I asked Mr. Alessi about massages that occurred within the home. Mr. Alessi stated Mr. Epstein had up to three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. There were times he recalled that he would set up the massage tables either in Epstein s bedroom or in his bathroom. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage. Alessi was never privy to what went on during the

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(Continued)

massages.

He was asked if he remembered any names of the girls that massaged Epstein. He tried to remember and was unable to provide any exact names of any girls. Alessi was asked about any contact with anyone from the Epstein organization. Alessi said he did speak with Mr. Epstein shortly after my initial contact with him to find out what was going on. Alessi also stated that approximately on November 11, 2005, he was contacted by a private investigator from the Law Office of Roy Black. The investigator had called him to meet with him to ascertain what he was going to tell the police. Alessi stated they met at the Carrabba s Restaurant in Boynton Beach and discussed the same questions I was asking him. I informed Mr. Alessi and Mr. Morrell that as this is an ongoing investigation and anything we discuss should be confidential. They both acknowledged the fact that the information would be kept confidential. It should be noted that a court reporter was present during the interviews and would be providing a copy of the statements to me when they become available.

On November 21, 2005, I received a voice mail from Mr. Fronstin who advised he would not be making Mr. Epstein available for any statements. He did have some words that he wanted to relay on behalf of Mr. Epstein. I telephoned his office and left a message for him to return my call.

On November 29, 2005, I received a call back from Mr. Fronstin who left a voice mail after hours on November 28, 2005, advising he would return my call during normal business hours to speak with me reference the case on November 29, 2005.

******************** N A R R A T I V E # 24 ************* Reported By: RECAREY, JOSEPH 11/29/05 Entered By: ALTOMARO, NICKIE A. 12/01/05

On November 29, 2005, at approximately 2:30 p.m. I received a telephone call on the department issued cell phone. Mr. Fronstin stated he was calling to relay information that Mr. Epstein wished he could relay. Mr. Fronstin stated that he would not allow Mr. Epstein to speak with me at this time. He further stated that Mr. Epstein is very passionate about massages. He continued that Mr. Epstein had allegedly donated over \$100,000 to the Ballet of Florida for massages. The massages are therapeutic and spiritually sound for him that is why he has had many massages. Mr. Fronstin stated he appreciated the way the investigation has not been leaked out into the media. I explained to Mr. Fronstin that it is as important to protect the innocent if the allegations are not substantiated. Mr. Fronstin was told of the allegations that the private investigators assigned to the case have been portraying themselves as police officers. Additionally, I explained that my cell phone had been called by the private investigators. Mr. Fronstin advised he was not aware of that and advised they were under the direction of Attorney Roy Black in

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Miami. Mr. Fronstin further stated Epstein had originally called Mr.
Dershorwitz in Boston, who recommended Roy Black in Miami, who asked
Mr. Fronstin to assist. I informed him that if and when any charges
would be presented I would notify him. The call was then terminated.

Investigation continues

A review of the telephone message books, which were obtained during the search warrant, was conducted in which various messages from different dates were made to Jeffrey Epstein. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages was time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by Sarah for Jeffrey Epstein. Based on the context of the body of the messages, I requested subpoenas for subscriber information on the telephone numbers and the time frame involved. Copies of the messages were made for evidentiary purposes.

I also had previously researched the telephone number for and telephone number. A subpoena had been issued for the information on The telephone number was registered to of A query of revealed that she is the daughter of and is currently residing at Det. Caristo and I attempted contact with with negative results. I left my business card on her front door requesting she return my call. We then responded to I also attempted contact with Mr with negative results. I left my business card for him to return my call.

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(Continued)

On December 9, 2005, I received a telephone call from mother, who was made aware of the on going investigation in Palm Beach. advised she was told of everything that occurred at Epstein's house involving Epstein and his staff. She advised she would allow me to question her daughter about what occurred and would cooperate with the investigation. provided me with cellular telephone number to schedule an appointment for an official interview. I telephoned her cellular telephone and made a tentative appointment for Monday, December 12, 2005.

I then received a telephone call from the property of the control of the who stated he found the business card on his door. I explained that I was conducting an investigation and needed to speak with the as she may have information that could assist in the investigation. Mr. the stated that his daughter no longer resides with him and has her own trailer in another trailer park. He advised he would tell her to call me.

On December 12, 2005, due to a conflict with schedules, arrangements were made to meet with on Tuesday, December 13, 2005 at 5:00 pm. On December 13, 2005, Det. Dawson and I traveled to During a sworn taped statement, stated that when she was sixteen years old, she was taken to Epstein's house to provide a massage for money. stated it was before Christmas last year when approached her and asked if she needed to make money for Christmas; stated she did and agreed to provide a massage for money. made arrangements to take to the house and drove to the house to "work." stated she could not remember the street name but would be able to drive to the street. They drove to the last house on the street and pulled in the last house on left side. They walked up the driveway and entered through a side gate which led to a kitchen door. They knocked on the door and were encountered by an employee who described as a "Spanish looking lady." They informed her that they were expected. They were then encountered by a white female with long blond hair. was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. described the bathroom as a large spacious bathroom with a steam room and shower beside it with a sink to the right. was introduced to Jeff who was on the phone when she entered. Jeff was wearing a white towel and lay on his stomach so that may massage his feet and calves. started the massage with the massage oil Jeff chose and rubbed his feet and calves. Jeff got off the phone and requested she massage his back as well. began rubbing his back and got to the small of his back. During the rubbing of his back Jeff asked her to get comfortable. He

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lase No. . . : 1-05-000368 requested she remove her pants and shirt. Temperemoved her shirt and pulled her pants off. stayed in her bra and thong panties. As she finished the small of the back, Jeff then turned onto his back. He instructed she rub his chest and pinch his nipples. As she began to rub his chest, Jeff asked her questions about herself. remembered telling him she attended Jeff asked her if she was sexually active. Before could answer, he also asked what sexual positions does she enjoy. stated she was shy didn't like talking about those things. continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. said "no, I don't like that." Epstein then removed his towel and lay on the bed naked exposing his penis to He began touching his penis and masturbated as he touched her breasts. explained Jeff then touched her vagina area by rubbing her vagina with his fingers on the outside of her thong panties. The tensed up and stated Jeff was aware that she was uncomfortable.

stated that Jeff told her , "Relax, I'm not going inside." She further explained Jeff commented to her how beautiful and sexy she was. Jeff then moved her thong panties to one side and now was stroking her clitoris. Said "Jeff commented how hard my clit was. " He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Jeff removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time he kept his hand on her vagina area rubbing her vagina. stated he rubbed her real hard as he was masturbating. . said he climaxed onto the towel he had been previously wearing and got up from the table. Jeff told her there was \$200.00 dollars for her on the dresser within the master bathroom. Jeff also told her that there was an additional \$100.00 that was to be given to there to massage him. Jeff told her to leave her telephone number with his assistant as he wanted to see her again. Jeff stated his assistant would contact her to work again soon.

I asked her if she ever received any formal massage training to which stated she did not. Stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She stated she no longer speaks to because she was upset that took her there. She further stated that she had never been contacted for any additional work. The interview was terminated and we left the area.

Investigation Continues ...

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Tase No. . . : 1-05-000368

(Continued)

On 102005 at approx 0930hrs I assisted with the execution of a search warrant at 358 El Brillo Ave, Palm Beach.

Initially I was assigned to enter the residence and conduct a sweep of the premises for safety purposes. I then accompanied CSEU tech Pavlik while she photographed the exterior of the house. Once this was complete I was assigned to search certain areas of the house with Det. Dawson as part of the search warrant.

We began in the garage, searching three Mercedes Benz vehicles, a Harley Davidson motorcycle and adjacent closets in the garage. Nothing of evidentiary value was located.

We then searched two closets off the kitchen area on the east side. These can best be described as pantry or storage closets. Nothing of evidentiary value was obtained.

A small office with adjoining bath was then searched. In the bath area I located a phone message book with recent messages. This item was seized as evidence. Please note this bath and shower area are not used as designed but are storage areas containing a variety of items to include a gun safe in the shower and assorted household items.

We then searched a bath area and closet at the base of the main stairs in the foyer. Inside the closet two massage tables were located as well as partial nude female photographs. These items were later seized as evidence. Nothing of evidentiary value was noted in the bathroom.

We then searched two bedrooms upstairs on the east side of the residence. Located in the bath room of the south bedroom was penis shaped soap. Located in the bedroom of the northern bedroom was penis and vagina shaped soap as well as an adult sex toy. These items were seized as evidence.

We then searched the pool cabana located in the south west corner of the property. Several photographs of nude females were seized as evidence.

I was then assigned to stand by with a person I believe was Douglas Schoettle. Mr. Schoettle was in the residence at the beginning of the search warrant. He was present during the warrant service and subsequent search. I stood by with him until the search was completed and I departed the residence. I had no conversation with him regarding the reason for our presence.

Regarding seized evidence, all items were photographed in place and then collected by CSEU personnel.

This concludes my involvement in this case.

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lase No. . . : 1-05-000368 (Continued)

On Thursday, October 20, 2005 at approximately 0936 hours, I assisted in the execution of a search warrant located at 358 El Brillo Way, Palm Beach, Florida, residence of Jeffrey Epstein. I was instructed by Case Agent Det. Joseph Recarey, to secure all computer and media related material from the residence.

Upon my arrival I was directed by Det. Recarey to a room designated as the Kitchen Staff Office. I observed a, Silver in color, CPU with the left side cover removed, exposing the CPU s hardware sitting on floor next to a glass type desk. The CPU had no discernable identifiers or features indicating a make or model. This CPU was powered off with the power cord not plugged in. The keyboard and mouse were atop the CPU. It should be noted that the CPU was not connected to a monitor, printer, or other media device. On the back Panel of the CPU, I observed an A/V card with RCA jacks attached. This type of hardware would allow audio and video to be downloaded onto the CPU s hard disk. The ends of the RCA jacks were unattached at the time of the search and no external camera was located within this room.

The CPU was located on the right side of a desk that held a flat panel LCD screen. The desk also held another keyboard and mouse, indicative of a second computer; however, no other computer was found. It appeared as though a second computer had been recently removed as the cables ends from the monitor, keyboard and mouse were in the same area. A further search of the room revealed no media storage devices, i.e. CD s, Floppy Disks, Zip Disks, etc. This type of media is commonly stored in an area where computers are placed, yet no media was found.

After completing a search of this room, I secured the CPU and turned all items over to the Evidence Custodian for future forensic analysis via a property receipt.

I was then directed by Det. Recarey to a room designated as the Garden Room, where I observed a wooden desk facing west. The desk held a flat screen LCD monitor, keyboard, mouse, media card reader and printer; however, no CPU was located. All of the cables were removed from an area where a computer had once been. A search of the desk area revealed no signs of any media devices.

Det. Recarey directed me to a third location designated as the Cabana room, which is detached from the residence and located just south of the pool. In the South East corner of the room, I observed an office type setting, with an L-shaped desk holding a flat screen LCD monitor, keyboard, mouse and printer; however, no CPU was located. All of the cables were removed from an area where a computer had once been. A search of the desk area revealed no signs of any media devices.

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Det. Recarey directed me to a second detached structure located on the South East corner of the property. This area of this structure was assigned with single letters to identify a particular part of the room. In the office area, designated as Room B, I observed a powered on Dell Dimension 2350, attached to an LCD flat panel monitor. The screen displayed an open Microsoft Internet Explorer browser with URL address of http://home.bellsouth.net/. I observed no other active windows in the Start panel window and photographed screen. The power cord was removed from the back of the Dell CPU and I disconnected the cable modem to prevent remote access. At that time, the Dell CPU, marked with Serial Number 6WTVN21, was secured and turned over the evidence custodian for future forensic analysis via property receipt. I also located several media related items within Room B, which were recorded onto a property receipt and turned over the Evidence Custodians.

I then responded to a Bedroom designated as Room F, where I observed a white in color CPU marked Premio. The Premio CPU was in a computer desk which held a white CRT monitor, both of which were powered on. The CRT monitor displayed a message from Norton Antivirus software, warning of an expired subscription. I observed no other active windows in the Start panel window and photographed screen. I removed the power cable from the back of the Premio CPU and shutdown all other media. The Premio CPU, marked with Serial Number 2000091078, was secured and turned over the evidence custodian for future forensic analysis via property receipt. I also located several media related items within Room F, which were recorded onto a property receipt and turned over the Evidence Custodians.

This concluded my participation in the search of the residence.

Reported By: RECAREY, JOSEPH 12/21/05
Entered By: ALTOMARO, NICKIE A. 12/21/05

On December 20, 2005, I contacted ASA Daliah Weiss in an attempt to subpoena the Epstein former houseman, Alfredo Rodriguez. Rodriguez, who resides in Miami, had eluded the process servers previously and was not served the investigative subpoena. A telephone message was left as she is not available during the week of 12/19/2005. I made contact with State Attorney Inv Theresa Wyatt and requested the same via telephone message.

I then researched the victim's cellular telephone subpoena data which had been received from a previous subpoena request. I analyzed the records which depict several calls from Haley Robson. The telephone calls start on February 6, 2005 at 12:49 pm.; the same day which the victim and the victim's father stated the incident occurred at Epstein s house. The first incoming call was from Robson's residence at . The second incoming call from Robson's

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ase No. . . : 1-05-000368 (Continued) cellular phone occurred at 1:02 pm. The call durations were one minute or less. The time frame was within thirteen minutes apart. It should be noted that Robson's residence was in close proximity to the victim's. The next call occurred at 5:50 pm when the victim telephoned Robson's residence. Several calls were made after the above mentioned calls both incoming and outgoing to Robson. Further analysis showed no telephone calls to either Robson's cellular telephone or Robson's residence were registered prior to February 6, 2005.

Additionally, I also conducted an analysis on the telephone calls from the subscriber information confirmed that the number is registered to Paul A Lavery from Hialeah, Florida. The address was crossed referenced to the Office of Kiraly and Riley Private Investigators. I researched the web page www.rileykiraly.com which also showed various cases in which they assisted. I also located another web site under www.coralspringssparklandrotary.org in which Mr. Riley attended a Miami Rotary meeting and confirmed Atty. Roy Black is among his clientele.

The telephone calls revealed Lavery had telephone contact with and either just after I attempted to interview them, or just prior. A background was conducted on Lavery which revealed he holds a current Private Investigator License. A criminal arrest record revealed he had been previously arrested for possession of cocaine and solicitation of prostitution.

I also researched the girls using www.myspace.com. This web site is a new social networking service that allows members to create unique personal profiles online in order to find and communicate with old and new friends. The site allows one to establish your own myspace.com page and decorate the page any way one wishes. I found the following people have myspace sites: Haley Robson,

I received a Cingular Wireless packet which contained a CD which contained the results of the subpoena request for verbatim calls on An analysis will be conducted in the near future on the phone numbers called.

Investigation Continues

Upon doing research on the message books recovered in the search warrant, I located the identity of ______ The telephone number ______ was registered to ______ She currently is seventeen years old and is attending the ______.

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responded to

I located the

I located the

I located inside the foundation and informed her that I was investigating a case against Jeffrey Epstein and knew she had been at the house.

Started to cry and advised she had put that part of her life behind her. I explained that although she is seventeen years old I needed to inform her parents that she would be interviewed. She provided her home telephone number. I attempted contact and left voice mail messages at the house to speak with her parents.

Det. Caristo and I then located at at her residence located at in I attempted to interview her about Jeffrey Epstein. She advised she is so in love with Jeff Epstein and would do anything for him. She further explained that she would not speak with us about him either negative or positive. She asked us to leave her property. I informed her that although she did not wish to speak with us, I had sufficient information at this point in the investigation to know she was at Epstein's house and provided girls to Epstein to work. I also explained that prior to our arrival at her residence I had telephone contact with her father.

Who was told she would be interviewed. I securently seventeen years old and as a juvenile, parental notification would be required. We then left the area and returned to the police station.

While at the police station, I left another telephone message for parents. I began an analysis of Sarah Kellen's Cellular telephone. The telephone number is assigned to Sarah Kellen and the financially responsible party is Jeffrey Epstein of 457 Madison Ave. in New York City, New York. The time frame which was subpoenaed was September 2005, through October 2005. There were eighty seven pages of calls made either to the cell phone or from the cell phone. The local (561) numbers were analyzed. A spread sheet was prepared and placed into the attachment file of who was called.

The unknown numbers were researched using FoneFinder.com and subpoenas were requested to determine subscriber information. This was done to identify additional victims or witnesses. The analysis revealed that Kellen had called the victim/witnesses frequently when Epstein was in the Town of Palm Beach to "work." This confirms what the girls interviewed had previously stated. Kellen would notify them when Epstein was in town and their willingness to "work." The CD was placed into evidence.

Investigation Continues.

On December 29, 2005, I received a facsimile from National Compliance

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Center from Cingular Wireless for telephone number 561-308-0282. This was the telephone number for Haley Robson during the time frame when the victim, was brought to the Epstein house to "work." An analysis of the phone records, of all incoming and outgoing calls, showed that on February 6, 2005, the day the victim, was brought to the house, Robson first called Sarah Kellen, Epstein's assistant, at at 12:50 pm (EST). The next call was made to Epstein's house in Palm Beach, at 12:52 pm (EST). The following call was made to the victim, at 1:01 pm (EST) and at 1:02 pm (EST). This confirms the information provided by the victim and victim's father. I photo copied the records and enlarged the page 8 of 10 to show the calls made by Robson on February 6, 2005.

To this date, I have not heard from parents. I will attempt to establish contact with them during the evening hours. I received a package from Atty. Guy Fronstin, which was hand delivered at the police station. Within the package, was a letter from Alan Dershowitz, and two www.myspace.com profiles. The profiles were that of MySpace.com is a social networking service that allows members to create unique personal profiles online in order to find and communicate with old and new friends. This package was in response to a previous meeting in which Mr. Dershowitz called to assist in the investigation in providing any additional witnesses such as house employees who have been reluctant to speak with law enforcement.

I reviewed the profiles Mr. Dershowitz enclosed. who designed her blog to be "still attends" sends and receives messages from friends which contain some profanity. Upon reviewing her friends' comments section from Myspace, most of her good friends sent messages to establish contact and invite her to go out.

I then reviewed web blog which was provided by Mr.

Dershowitz. Ms. designed her blog to be the Her blog states that her interests include music, theater and weed (Marijuana). I reviewed her packet in which declares her love for her live-in boyfriend. She also describes using marijuana with her boyfriend

The letter Mr. Dershowitz sent advised he was looking into the allegation that one of the private investigators used by the private attorneys of Epstein, attempted to impersonate or state that they were police officers from Palm Beach. Mr. Dershowitz advised that the investigators used to interview had "quite a distinct speech impediment", did not claim to be nor did they impersonate themselves as a police officer. This package was sent to both ASA Lana Belohlavic and ASA Daliah Weiss at the State Attorney's Office.

I made telephone contact with ASA Weiss to confirm she received the package and request an interview with Sarah Kellen, Nada Marcinkova, and Janusz Banasiak. She advised she would assist in attempting to

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ase No. . . : 1-05-000368 contact Mr. Dershowitz.

(Continued)

On January 3, 2006, I received a telephone call from ASA Weiss who informed me that she made telephone contact with Mr. Dershowitz. She had requested the employees be available the week of January 3, 2006. Mr. Dershowitz informed her that the assistants are out of the country and would require additional time to locate them and make them available.

Investigation Continues.

On Thursday, 03/31/05, I started conducting surveillance at 358 El Brillo. At this point I observed at 1155 hours, a Tan Altima bearing FL tag A303AN in Roadway, Black SL bearing FL tag V55RFW in drive, Tan Honda Civic bearing FL tag X98APM in Roadway, Black Chevy Suburban in driveway and a Black Caddy Escalade in driveway. At 1325 Hours I observed Tan Honda Civic X98APM in roadway, Black Chevy Suburban in driveway, Black Caddy Escalade in drive and a White Kia car bearing FL tag D651BQ. At 1615 hours I observed a Tan Honda Civic, X98APM in roadway, Black Chevy Suburban in drive, Black Caddy Escalade in driveway and a White Kia car D651BQ in roadway.

On Friday, 04/01/05, I continued surveillance at 358 El Brillo. At 1130 hours I observed a Tan Honda Civic bearing FL tag X98APM in roadway, Black Caddy Escalade in driveway and a Tan unknown make/model bearing FL tag A303AN in roadway. At 1227 hours, I observed a Tan Honda Civic X98APM in roadway, Black Caddy Escalade in driveway and a Black Chevy SUV located behind the Escalade. At 1345 hours, I observed a Tan Honda Civic X98APM in roadway and a Black Chevy SUV in driveway. At 1558 hours, I observed a Tan Honda Civic X98APM in roadway, Black Chevy SUV in driveway, Black Chevy SUV in driveway, Black Caddy Escalade in driveway and a dark unknown model/make car parked in garage.

On Saturday, 04/02/05, I continued surveillance at 358 El Brillo. At 0713 hours, I observed a Red Explorer bearing FL tag J98JEI in roadway and a Black Caddy Escalade in driveway. At 0814 hours, I observed a Red Explorer J98JEI in roadway, Black Caddy Escalade in driveway and a Tan Honda Civic X98APM. At 0952 hours, I observed a Red Explorer J98JEI in roadway, Black Caddy Escalade in driveway, Tan Honda Civic X98APM in roadway and also a Grey unknown make/model with a B.M in trunk retrieving landscaping tools.

At 1155 hours, I observed a Grey Camaro bearing FL tag parking in the roadway in front of 358 El Brillo. A W/F, blond hair, teens to early 20's, thin and tall wearing a white tank top and short blue jean shorts, exited the vehicle and walked to the rear of the house. I also observed a Red Explorer J98JEI in roadway, Tan Honda Civic X98APM in roadway and a Black Caddy Escalade in driveway. At 1310 hours, I

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Continued)
observed a Red Explorer W/F driver leaving the area, Tan subcompact on
roadway and a Red Neon bearing FL tag

Then observed 3 W/Fs,
approximately 16 to 18 years of age jogging. All 3 females ran into
the driveway. There were 2 with blond hair and one brown hair.

On Sunday, 04/03/05, I continued surveillance at 358 El Brillo. At 0719 hours I observed a Tan Honda Civic X98APM in roadway and a Black Caddy Escalade. At 0934 hours, I observed a Tan Honda Civic X98APM in roadway and a Black Caddy Escalade in driveway. At 1057 hours I observed only the Tan Honda Civic X98APM.

On Tuesday, 04/05/05, I continued surveillance at 358 El Brillo. At 1052 hours, I observed a Red Explorer J98JEI in roadway, a Green Explorer, bearing FL tag F91KAK in roadway, a Grey Altima bearing FL tag A303AN in roadway, White Ford Truck H58LRA in roadway, Black Mercedes in driveway being washed by a B/M and an unknown dark car parked in the garage. At 1059 hours a Blue Chevy Suburban drove to the house of 358 El Brillo and parked in the driveway. At 1119 hours, I observed the White Fort Truck H58LRA leave the area and the drive was the pool man.

At 1126 hours, I observed a Grey unknown make/model car park in roadway. W/M got out of the car and walked to a house on the south side of El Brillo. At 1406 hours, I observed a Red Explorer parked on roadway and a large white box truck parked behind the surveillance suburban.

On 03/31/05, at approximately 1500 hours while conducting surveillance at 358 El Brillo, I observed a Black Cadillac Escalade, unknown tag, a Black Chevrolet Suburban, unknown tag, a Black Mercedes S600 FL tag U90BQL parked in the east driveway next to the 3-car garage. There was a Tan Honda Civic FL tag X98APM parked on the street in front of the residence.

At approximately 1700 hours, I observed the Black Suburban, Black Escalade, Black Mercedes and Tan Honda Civic parked in the same place. At 1750 hours, there was no change in vehicles. At 1840 hours, I observed the Black Escalade, Black Suburban and Black Mercedes along with a Silver Hyundai Accent FL tag A136AN all parked in the east driveway and a Red Ford Explorer FL tag J98JEI parked on the street in front of the residence.

At 2000 hours, I observed the Black Escalade, Black Suburban parked in the ease driveway and the Red Explorer and Tan Civic parked on the street.

On Friday, 04/01/05 at approximately 1700 hours, I observed the Black

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Escalade and Black Suburban parked in the east driveway and the Tan
Honda Civic parked on the street in front of the residence. At 1820
hours, I observed the Suburban and Civic in the same place and a Gold
Chevrolet Camaro FL tag parked on the street in front of the
residence. At 2250 there was no change. At 2330, I observed the
Black Escalade parked in the driveway and the Red Explorer parked on
the street in front of the residence.

On Saturday, 04/02/05 at approximately 1700 hours, I observed a Black Escalade, unknown tag, parked in the driveway and a Tan Honda Civic FL tag X98AMP parked in the street in front of the residence. At 1805 hours the Escalade and Civic were in the same position and the Black Mercedes FL tag U90BQL was also parked in the east driveway. At 1920 hours the Escalade and Civic were the only vehicles and both were in the same position. At 2030 hours and 2145 hours there were no vehicles observed.

At 2115 hours, I observed a Black Mercedes, 4-door parked in the east driveway FL tag G14CT. At 2300 hours, 2350 hours and 0045 hours, the Black Mercedes was the only vehicle observed.

I made contact with Mr. And the property of the stated he was aware and had spoken with his daughter about the incident. He stated that his daughter had previously told him that she was hired to model lingerie at a Palm Beach mansion. Mr. stated he knew nothing else about what she did when she went to "work." Mr. Advised he would cooperate with the investigation and make his daughter available for interviews. I asked if she was available for an interview, astated she was not at home at the moment. I informed him I would make contact with her at a later time. Mr. Expressed his interest in the resolution in this matter as he stated this information has affected his daughter emotionally.

On January 4, 2005, I acquired the subpoenas from the State Attorney's Office for Cingular Wireless, Metro PCS, Verizon, Bell South Telecommunications and Sprint for the unknown telephone numbers from Sarah Kellen's cellular telephone. The subpoenas were sent to the respective telephone carriers for subscriber information.

I received a telephone call from State Attorney's Office, who informed me that the former houseman for Jeffrey Epstein, Alfredo Rodriguez, was present at the State Attorney's Office for an interview. Rodriguez was issued an investigative subpoena for an interview on the on-goings at Epstein's house during his employ. I responded to the State Attorney's Office and encountered Mr. Rodriguez waiting in the lobby. I brought Mr. Rodriguez to the interview room.

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(Continued)

During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months. He was referred by associates and his employment lasted the months of November 2004 through May 2005. His responsibilities as house manager included being the butler, chauffer, chef, houseman, run errands for Mr. Epstein and provide for Epstein's guests. Rodriguez advised he had very limited contact with Mr. Epstein. If Rodriguez needed to relay a message to Mr. Epstein, he would have to notify Epstein's secretary "Leslie" in New York City, who would then notify Epstein's personal assistant, Sarah, who would relay the message to Epstein. Rodriguez stated Epstein did not want to see or hear the staff when he was in residence.

I asked Rodriguez if Epstein received many guests during his stay in Palm Beach. Rodriguez advised he had many guests. I asked specifically about masseuses coming to the house. Rodriguez stated he would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either Sarah or Epstein would meet with them.

Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either Sarah or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. He advised he didn't ask their ages but felt they were very young. Rodriguez stated they ate like his own daughter who is in high school. Rodriguez stated they would eat tons of cereal and drink milk all the time. Rodriquez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would clean Mr. Epstein's bedroom after the alleged massages and would discover massager/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's bed.

Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house. Rodriguez referred himself as a "human ATM machine" and was ordered by Epstein to maintain a minimum balance of \$2,000 dollars on him at all times. When a girl would come by the house and Mr. Epstein was either not in residence or was not at home at the time, Rodriguez was to provide the girl (masseuse) several hundred dollars for their time and to notify Epstein the amount they were given. Epstein also ordered Rodriguez to

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lase No. . . : 1-05-000368 (Continued)
 purchase several gifts and provide them as tips to the girls. I asked
 what kind of gifts. Rodriguez stated he purchased IPODS, jewelry,
 anything the girls would want.

Rodriguez stated the amount of girls that came to the house was approximately fifteen. Each of the girls knew each other and all seemed to know at who Mr. Epstein was. When asked to identify these girls, Rodriguez stated he could not at the moment but knew he wrote their names down on a journal he kept during his employ with Mr. Epstein. He kept a journal in the event he needed to explain either to Mr. Epstein or his assistants what was done at the house or who visited the house as he stated he was in-charge of Mr. Epstein's personal security while in Palm Beach. I informed him I would need to view this journal to which he stated he would research the book and contact me to provide the book. The interview was concluded and left the area. I returned back to the police station where the micro cassette was placed into evidence. At approximately 7:20 pm, I was notified Rodriguez located the journal and would call me on January 5, 2005 to provide the journal.

Investigation Continuesàà

On January 5, 2006, I attempted to meet with Alfredo Rodriguez to recover the folder or journal in which he kept the notes that were given to him during his employ with Mr. Jeffrey Epstein. He kept this folder to justify what he did during his employ should the need arise to justify what occurred with the monies he had to keep or any questions as to the petty cash he withdrew from the household account from the bank. At approximately 10:00 pm, I attempted contact with Mr. Rodriguez and discovered he was assisting his wife at her place of employment and would not be able to meet with me. Mr. Rodriguez stated he would meet with me on January 6, 2006, in Broward County, in the morning hours.

On January 6, 2006, at approximately 9:00 am, I received a telephone call from Mr. Rodriguez who advised he had the file in hand and would be traveling northbound to meet with me in Broward County. At 10:50 am, I met with Alfredo Rodriguez at the parking lot of Bank of America in Boca Raton on Yamato Road and Military Trail (known as the Polo Center). Rodriguez produced a green folder which contained documents, a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to after after after and direction to extend the rental contract. I returned to the Palm Beach Police Station and placed the folder into evidence.

I received a fax from Verizon from the subpoena request sent on

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ol-04-06, for telephone number . The phone number is registered to Dr Perry Bard, from West Palm Beach. Dr. Bard is a chiropractor and has an office located 4275 Okeechobee Blvd in West Palm Beach. The cellular number is Dr Bard's personal cellular number.

On January 9, 2006, Det. Caristo and I traveled to 622 Holly Drive in Palm Beach Gardens in an attempt to locate Johanna Sjoberg, who had been previously seen on the property and identified through her Florida Drivers License and Florida license Plate. A business card was left for her to return my call. We then traveled to the and located agreed to speak with us and in a private room within the school provided us a taped statement.

During the statement, advised that when she was fifteen or sixteen years of age, she was taken to Jeffrey Epstein's house by her associate, astated this occurred late May 2004 or early June 2004. She was told she could model lingerie for money for a wealthy Palm Beacher. She remembered they traveled by yellow cab from their residence in West Palm Beach to Epstein's house. She remembered encountering Epstein at the front door during the evening hours.

He introduced himself and brought them into the kitchen so that the chef could prepare something for them to eat. After having a meal, and Epstein brought upstairs to a master bedroom which had a large bathroom. She observed a large style shower, sauna and there was a large massage bed also in the bathroom. Epstein entered a room within the bathroom and came out wearing only a towel. said they would provide a massage on his feet. asked why they are doing this. told her this was part of the routine and told her to rub his legs and calves. Epstein had told to get comfortable. Continued rubbing Epstein's calves and feet. At Epstein's direction, then left the room leaving there by herself. Epstein told to get comfortable. removed her blouse and pants and stayed in her panties. was not wearing a bra. She believed she was wearing thong panties. Epstein turned over onto his back and began touching her. Epstein touched her breasts and began touching her in her vagina area. Epstein instructed her to rub his chest and rub his nipples. stated the touching consisted over the panties on the first time; he stroked her vagina but stayed on top of the panties. During the first massage, she stated Epstein was stroking her and began masturbating himself at the same time. He put his hands under the towel and appeared as to masturbate himself however she never saw his penis. She continued rubbing his chest until he grabbed her and pulled her closer to him. He appeared to have climaxed because after he pulled her closer to him the massage was over. Epstein had told her that there was two hundred dollars for her on the dresser. He told her that she could not tell anyone what happened at the house or bad things could happen. stated she went to Epstein's house three

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or four times total. was very scared and felt very nervous.

She knew because of Epstein's money he was powerful. After the massage, Epstein ordered his houseman at the time to drive the girls home. The employee was to drop off the girls at their house and watch them go inside their house.

could not remember who the houseman was. She stated Epstein and his assistant Sarah would call her at her father's house to arrange for her to come and "work." She advised each time she returned to the house, Epstein would do the same thing. Stated it was a routine with Epstein. She would rub his feet and calves. He would then turn over and begin to touch her on her vagina area. The only difference was that it was done without panties. Epstein's fingers would stroke her vagina area as he would masturbate and finally climax and the massage would be over. She was paid \$200.00 each time she went. Each time she went she was reminded not to speak of what happened at the house and that she would be contacted again. She began to purposely miss the calls when either Sarah or Epstein would call her. She once brought a friend, unknown last name, to work for Epstein. She was paid \$200.00 for bringing stated she no longer retuned to work for Epstein. She also stated that she wanted to notify the police of what happened at the house. stated she was scared of what could have happened to her or her family if she notified authorities.

On January 10, 2006, I received the results from the subpoena from BellSouth Telecommunications for telephone number The number is assigned to Mr.

I also received the results from Western Union which confirmed the money order sent to from Jeffrey Epstein in New York City. The "wire" was sent by Jeffrey Epstein of 457 Madison Ave in New York City on December 23, 2004 at 12:05 pm. The amount of \$222.00 was charged to Epstein's credit card so that could receive \$200.00 in The twenty-two dollars was for processing and local fees to send the money via Western Union. A copy of the check presented to was also attached to the receipt of the wire. This confirmed what advised she received as a Christmas bonus from Epstein.

Investigation continues.

I received and reviewed the Cingular Wireless results from the subpoena requests for subscriber information for telephone numbers, and The first number, is assigned to Janusz Banasiak in care of Jeffrey Epstein of 457 Madison Ave in New York City. Banasiak is the current houseman/house manager for 358 El Brillo Way in Palm Beach, Fl 33480. The second number, is assigned to Christina Venero of

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ase No. . . : 1-05-000368 (Continued)
1685 61st Drive in West Palm Beach. Research conducted on Venero
revealed she is a licensed Massage therapist with a Florida
conditional/active license number MA39723. Venero had been previously
arrested for battery / unwanted touching and DUI. Requests for copies
of the reports involving the arrests were requested from the Palm
Beach County Sheriff's Office. The last number
assigned to Thomas Rofrano of
Research on Mr. Rofrano, revealed that he is a Florida Chiropractic
Physician.

Vehicles that were previously documented on the property while surveillance was being conducted were researched. I determined a tan Chevrolet Camaro, bearing Florida license was seen on the property in which a young white female was seen entering the Epstein property. Research was conducted which revealed that the vehicle is registered to of Mr. has two daughters, is currently residing in Connecticut and is residing with her father in Research on revealed she was recently involved in a traffic stop in Lake Clarke Shores in May 19, 2005. A request to discover any information from the stop was requested.

I spoke with ASA Daliah Weiss who informed me that Janusz Banasiak will be available for an interview tomorrow at the State Attorney's Office in West Palm Beach at 1:30 pm. I informed her that I would be at her office for the interview.

On January 19, 2006, Det. Caristo and I met with Johanna Sjoberg at 622 Holly Drive in Palm Beach Gardens. Sjoberg was identified as a licensed massage therapist who had previously been seen on Epstein's property when physical surveillance was done. Sjoberg was told of the on going investigation and I felt she may have information pertaining to the case. During a sworn taped statement, Sjoberg stated she met Epstein three years ago when Ghaline Maxwell approached her while she was attending Palm Beach Atlantic College to work around Epstein's house. Maxwell had told her that they needed some girls to work at the house to answer phones and run errands. Sjoberg accepted the job and began working at Epstein's house on El Brillo in Palm Beach. Sjoberg stated it was a part time job during the time she went to Palm Beach Atlantic College. She continued going to Epstein's house and would be notified when Epstein would travel to Palm Beach. Sjoberg advised she would be notified by Maxwell, Epstein or Sarah, his assistant, when he would travel to Palm Beach. Sjoberg stated she began providing massages to Epstein before she became a massage therapist. She continued giving massages not only to Epstein but to Nadia Marcinkova, and Sarah, his assistant. Sjoberg was asked about what occurred during the massages. Sjoberg stated as she was twenty

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three years old when she met Epstein, anything that happened was between two consenting adults. I explained to her that she was not in any trouble however as part of this investigation, I needed to ask certain questions. Sjoberg stated that there were times that Epstein would ask her to perform during the massage. He would instruct her to rub his nipples as he masturbated himself. Sjoberg stated she felt "grossed" about the behavior but as she was getting paid, she just continued. Sjoberg also advised she would on occasion perform the massages naked. Epstein would on occasion, utilize the vibrator/massager on her vagina area when she performed the massages. Sjoberg explained that Epstein never exposed himself to her as he maintained himself covered under the towel he would be wearing. When Epstein would masturbate he would be covered.

I asked if Sjoberg ever received any gifts, or any gratuities from Epstein. Sjoberg advised aside from being paid well, she advised Epstein took care of her tuition from Palm Beach Atlantic College. She received a rental car for a week when her scooter broke down.

Additionally she received other gifts from Epstein. Epstein also recommended her to another client who resides at Breakers Row in Palm Beach. The client she was referred to was "Glenn" unknown last name, and his wife, who she provided a massages to. The statement was concluded and placed into evidence upon our return to the Palm Beach Police Department.

While at the police station, I researched Florida tag which was also previously seen on the property when there was physical surveillance being done at the property. The vehicle is registered to of Researching Mr. and the vehicle revealed that his daughter, had been driving the vehicle and was cited for unlawful speed in Lake Clark Shores. The vehicle is a tan, Chevrolet Camaro, 2-door. I researched, date of birth, Resides at in has a my space page called www.myspace.com/ In her web page, shows various photos of photographed at a beach. An interview is forthcoming.

A review of the video disks which was extracted at the Palm Beach County Sheriff's Office Computer Crime Unit revealed that only one hidden camera was functional at the time. Several images of Epstein working at his office were seen. Additional footage of Sarah Kellen and Nadia Marcinkova was seen. There was other footage of females seen. The identity of the females is unknown at this time, until such time as I meet with certain females to show the video footage to confirm if, in fact, it is them on the video. At this time it appears that and Haley Robson are seen sitting with Epstein beside his desk in the evening hours. Due to poor lighting, a direct confirmation cannot be made at this time.

Inv. Continues.

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ase No. . . : 1-05-000368 (Continued) Reported By: RECAREY, JOSEPH 1/30/06 Entered By .: ALTOMARO, NICKIE A.

On January 25, 2006, Det Caristo and I, responded to in and met with stated last year, when she was seventeen years of age, she met Jeffrey Epstein through her former room mate was allegedly dating Epstein at the time. and had once cohabitated together when they modeled. explained called her on her telephone and advised her that she was in Palm Beach and requested to see her. made arrangements to meet with her at Epstein's house. arrived and met Epstein and and and went to the Palm Beach Mall together and went shopping. advised that a and she had received money from Epstein to go to the mall. They visited Victoria's Secret and purchased undergarments from the store utilizing monies given by Epstein. advised she purchased one item and purchase various items. The money used to purchase the items was the money given by Epstein.

and continued shopping and having a day together. stated explained how she and Epstein have been dating each other and he has been paying all of her bills. Claimed advised they met in New York and had been dating ever since. They later returned to Epstein's home and encountered Epstein. He had a brief conversation with about her modeling career. He knew of her modeling career from He requested to see her modeling portfolio and explained that he could help her with modeling jobs had her book with her to show and showed the book to Epstein. He commented negatively about her photographs and portfolio. felt uncomfortable with the comments made as she had been working with other professional modeling companies who had offered her work from her photographs. Epstein requested to see what was purchased at the mall. took out the undergarments which were purchased. She immediately showed Epstein different sets purchased. Epstein then requested to view what purchased. was reluctant to show the out it however since it was Epstein's money that purchased the item, she pulled it out of the bag. Epstein asked her to try it on. looked at who told her "yeah, try it on." Feeling compelled to try the undergarment outfit on; she went to another room and put on the bra and panty set. She walked out to the living room where they were sitting, and modeled the suit. She then went back into the other room and changed back into her clothes. returned into the room and told she would be going home. scheduled another day for to return for massages with her.

and have a massage. The had told her that she would be unable to stay with her as she would be going on a bike ride with Epstein. explained she could stay at the house and take advantage of the massage.

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ase No. . . : 1-05-000368 stated she met with an unknown massage therapist and had the table already set up in a guest room. removed her clothing, leaving her panties on, and wrapped herself with a towel for the massage. Temembered that the door to the guest room was closed but not locked. As the therapist was working her back, the door was opened by Epstein and entered into the room. was trying to conceal herself as Epstein was talking to her about his chiropractic session. Epstein told turn over onto her back. eventually turned over exposing her breasts to Epstein as he applied pressure on her shoulder and her waist. was stated Epstein "popped" her back. removed her self from the table, got dressed and left the house. further stated had attempted to call her on several occasions to invite her back to Epstein's house to which replied "I'm busy." advised she has not had contact with either or Jeffrey Epstein. It should be noted that her mother, was present during the interview. The interview was concluded and we thanked them her for their time

On January 27, 2006, I made telephone contact with Christina Venero, at . Venero is a licensed massage therapist who had frequented the home of Jeffrey Epstein. Ms. Venero has been unable to meet with me in Palm Beach County, and because she lives and works in Port St Lucie, a telephone interview was conducted. I explained to Ms. Venero that there was an on going investigation involving Jeffrey Epstein.

Venero stated she knows Epstein and has been employed by him for approximately three years. Epstein has paid Venero to perform Swedish Massages (Deep Tissue) on him and other guests. Venero explained that approximately three year ago she met Ghislaine Maxwell and Jeffrey Epstein through a mutual friend. Epstein and Maxwell were looking for a massage therapist. Venero stated since that time, she is notified when Epstein is coming to Palm Beach. Venero stated she comes to his house and provides the massage or massages. Venero explained she has also massaged his guests and assistants. Venero continued that she is paid \$100.00 and hour for the massage.

I asked Venero if anything occurred during the massage that would have made her feel uncomfortable. Venero stated she only provided massages and that was it. She never was approached for anything else. I asked if Epstein ever asked her to rub his chest she stated she would not rub his chest as that is not part of her massage. Venero explained that she was not Epstein's type. The girls she would see at Epstein's house were very thin, beautiful and without tattoos. Venero explained she has several tattoos that are visible. Maxwell and Epstein have commented negatively about her tattoos previously when she has provided massages.

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ase No. . . : 1-05-000368

(Continued)

Venero stated she only provided massages for Epstein and his associates and nothing happened during those massages. Venero stated as she does Swedish style massages, the patient is usually sore after the massages. I thanked her for her assistance and the interview was concluded at this time.

I received a facsimile from T-Mobile Cellular service on telephone number which is assigned to David Rodgers, pilot for Mr. Epstein, who resides in Lake Worth. Rodgers' telephone number was dialed on several occasions by Sarah Kellen. A background on Rodgers indicated he has a valid FAA pilot license First Class for the Southern FAA Region. Rodgers has another historical FAA license for Airline Transport Pilot.

Investigation Continues

On Friday, February 3, 2006, I had made arrangements to meet with Joanna Harrison at the Palm Beach Police Station. At approximately 1:00pm, Harrison and her friend, Victoria Bean arrived at the police station. During an interview with Harrison, she stated she met Epstein when she turned eighteen years old and was brought to Epstein's house to provide a massage. She advised this occurred on May of 2005. She advised Haley Robson had informed her if she wanted to provide a massage for \$200.00. Harrison agreed and was brought to Epstein's house to provide a massage. Harrison stated she had been to the house on many occasions during the massage sessions. Harrison also stated she would remove her clothing to provide the massage on Epstein. Harrison advised Epstein would pay her \$300.00 to rub his back, legs and chest. During the massages, Epstein would masturbate himself as she rubbed his chest. I asked her if Epstein ever touched her breasts during the massages. Harrison replied. "Yes." I asked her if Epstein ever touched or massaged her vagina. Harrison stated he had on several occasions. I asked her if he ever penetrated her with either his penis or any other objects. Harrison stated that during a massage he inserted his fingers in her vagina as she massaged him. She stated this occurred one time only. Harrison stated the massage would be over when Epstein would climax onto a towel. I asked Harrison if she had any formal massage training to which she replied that she did not. Harrison was then asked if she ever brought anyone to the house to "work." Harrison stated she brought two people to the house. She advised she received money for bringing people to the house to "work." Harrison stated she brought a girl named and her friend Tory Bean. Bean was still waiting for Harrison in the lobby of the police station. I thanked Harrison for her time and her cooperation and escorted her to the lobby.

I asked Ms Bean if I could speak with her about this investigation. I

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ise No. . . : 1-05-000368 (Continued) brought her to the interview room and explained to her that I was conducting an investigation on Jeffrey Epstein and felt she may have information pertaining to the investigation. Ms Bean identified herself as Victoria Bean and resides in Wellington, Florida. She advised approximately a year ago she was brought to Epstein's house to provide a massage for money. Bean stated she needed to make money and felt it was a quick way to make some money. Bean stated she was brought to the house by Harrison and was introduced to Epstein and his assistant. She was brought to his main bathroom and provided a massage. I asked her if she provided the massage naked. Bean stated she did. She rubbed Epstein's legs, back and chest. I asked Bean if Epstein touched her during the massage. She advised he did not, however he did masturbate himself as she rubbed his chest. Once he climaxed the massage was over. She was paid her money and left the area. Bean advised it occurred one time and she never returned to Epstein's house. The interview was concluded and Bean was escorted to the lobby.

I located a telephone number for and attempted to contact her on several occasions. I called and spoke with Ms. who advised she would speak with me in where she resides. Due to a scheduling conflict, we were unable to meet. I informed her I would contact her to schedule another appointment to speak with her about this investigation. I have attempted to meet with her and make telephone contact with negative results.

On February 13, 2006, I met with David Rodgers at 7318 Heathley Drive in Lake Worth. Rodgers was identified as Epstein's pilot. I spoke with Rodgers who advised he has been employed with Epstein since 1991. He flies both planes for Epstein depending where he wants to fly to. Rodgers was asked about passengers in the plane he flies. Rodgers stated unless Epstein flew to his island off of St Thomas, there would be no way of knowing who the passengers were. I mentioned a recent flight to Ohio, where Rodgers flew to Ohio to pick up Rodgers stated he recalled flying on several occasions and did remember Rodgers stated once he is in the cockpit, he does not know who the passengers are. When he prepares the passenger manifests, he lists Epstein and his assistants he knows by name, Sarah and Adrianna. Rodgers stated he would list either female or male passengers on the manifests only to keep a count on the passengers. Mrs. Rodgers came into the living room and recommended that her husband consult with an attorney. Mr. Rodgers agreed he would speak with the family attorney to inform him of this questioning. I explained to Mr. Rodgers that he was not the suspect in this investigation and ceased all questions. Based on the fact Rodgers could not advise who passengers were in the plane, I then left the area.

I attempted to locate at at a in

I left my business card for her to return my call. On
February 14, 2006, at 12:06 pm, I received a call back from Ms.

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on my voice mail Ms left her telephone number for a return call 561-662-3098. I left her a message to return call.

Investigation Continues ..

On February 15, 2006, I made telephone contact with provided directions to where I could locate her. Det Caristo and I responded to 806 Old Dixie Hwy in Lake Park to meet with Upon my arrival, I met with in the parking lot directly behind MAACO Auto Painting. She was advised I was there to speak with her about an ongoing investigation that concerned Jeffrey Epstein in Palm Beach. stated she knows Epstein very well and did not want to speak with me about Mr. Epstein. She was very fond of Epstein and did not want to speak with me about anything concerning Jeffrey Epstein. I explained to her that she was seen at the house and I would like to speak with her. She stated she knew there was an investigation and that I had spoken with other people and therefore I should know what happened at Epstein's house. ended the conversation and walked back into her boyfriends business, Blanton Automotive. Det Caristo and I left the area and returned to the police station.

Investigation continues.

A Grand Jury Session was requested during the month of February 2006, in which all the girls that had been interviewed would have been called to testify before the Grand Jury to seek an indictment against Jeffrey Epstein. Due to subsequent meetings with the State Attorney's Office and Defense Attorney Alan Dershowitz the Grand Jury was postponed until a later time. Dershowitz had provided a package of material on the main victims in this case in which they appear on myspace.com and speak about alcohol use and some marijuana use. The State Attorney's Office wanted time to review the material.

I requested additional subpoenas from the State Attorney's Office in which I requested information from Dollar Rent a Car and Jet Aviation. The information requested from Dollar Rent a Car was for the rented vehicle by Alfredo Rodriguez while under the employ of Epstein for one of the victims. The other subpoena requested was for Jet Aviation for dates and times when Epstein's planes were in Palm Beach County.

I continued to research other names that were acquired either from interviews or intelligence gathered during the investigation. I

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located in During the interview, (Continued) stated she knew I would be speaking with her. stated she was first introduced to Epstein when she turned eighteen years old. stated she was sure of her age as it was her senior year in She advised she was brought there to make money and was told she would have to provide a massage to this Palm Beach guy. She remembered she met Epstein and his assistant Sarah in the kitchen area. She stated she was taken by one of her friends, She stated she went upstairs with Sarah while Epstein got ready for the massage. He exited his bathroom naked and turned around. Epstein asked her if being naked offended her. stated it made her uncomfortable. Epstein then put on a towel and lay on the table. Stated she rubbed his back and feet. She stated she had no massage training or experience. stated during the massage, Epstein attempted to touch her buttocks. pulled away as he touched her buttocks. She told him again she was uncomfortable with him touching her. Epstein then cut the massage short and became upset with her. Epstein paid her \$200.00 for the massage and told her to leave the house. never returned to the house. She did advise of one time she went with however she waited in the car for a sas she did not want to go into the house. At the conclusion of visit with Epstein they left the area. Stated she had heard from other girls that have gone to the house that Epstein now required them to do the massage naked and allow him to touch them in their private areas for monies. The interview was concluded as did not have any other information to provide.

I then learned from the original victim, the defense attorney had learned of her identity. I spoke with the father of the victim, who stated there has been a private investigator on his house photographing his family and chasing visitors who come to the house. He provided a Florida License of E79-4EH. This vehicle is registered to Ivan Robles of West Palm Beach. Robles is a private investigator intern who is licensed by the state. I informed the State Attorney's Office of the above information.

I received the Grand Jury subpoenas to be delivered to three victims for a Grand Jury session to be held on April 18, through April 20, 2006.

Investigation continues.

The Grand Jury Subpoenas were personally served to the individuals they were issued to. On April 5, 2006, at approximately 7:30 p.m., I personally served the parents of have who had informed me that the private investigators were still photographing the family. On April

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10, 2006, at approximately 2:30 p.m., I served at her residence in

The subpoena was given to her mother,

I learned through one of the victims that she was personally contacted through a source that has maintained contact with Epstein. The source assured she would receive monetary compensation for her assistance in not cooperating with law enforcement. Talso stated she was told, "Those who help him will be compensated and those who hurt him will be dealt with." I told that tampering with a witness/victim is an arrestable offense and very serious. I asked her who approached her during this encounter. To originally was reluctant to provide the name of the person who approached her to offer her not to testify because she felt they were still friends.

On April 11, 2006, Det Dawson and I traveled to Tallahassee, Florida and met with the victim, identified W/F, as the person who approached her in Royal Palm Beach while she was home during Spring Break in March 2006. also stated she did not want to pursue the intimidation charges on was concerned that the defense attorney was given a copy of the report as certain things she had told me in confidence were repeated to her by Beal. Prior to our departure, the victim was given a copy of her subpoena for the Grand Jury which was scheduled to commence April 18, 2006.

Upon our return from Tallahassee, I notified the State Attorney's Office of what was told to me. I also notified them that the subpoenas were delivered to the witnesses and they would be calling for arrangements for the date and time needed for the Grand Jury. I spoke with ASA Weiss and informed her of the possible intimidation by the defense.

On April 13, and April 14, 2006 I attempted contact on several occasions with ASA Weiss and ASA Belohlavic to ascertain when the victims needed to report for Grand Jury testimony. Messages were left on their voicemail. On April 17, 2006, during the hours of 9:00 am and 11:30 am, I again left messages for ASA Weiss and ASA Belohlavic for either of them to return my call as I had not heard from the State Attorney's Office as to the time and date of the Grand Jury.

At approximately 12:30 pm, I went to the State Attorney's Office and located ASA Weiss and ASA Belohlavic in their offices. I entered ASA Belohlavic's office who informed me that she was going to return my call. She explained that an offer was made to the defense, Atty Guy Fronstin and Atty Alan Dershowitz. The offer is 1 count of Agg Assault with intent to commit a felony, five years probation, with adjudication withheld. Epstein would have to submit to psychiatric/sexual evaluation and no unsupervised visits with minors. When asked about the all the other victims, ASA Belohlavic stated that was the only offer made as to one victim, ASA Belohlavic cell phone rang and went to voice mail. She checked her voice mail and played the message on speaker. The caller identified himself as

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Atty Guy Fronstin and acknowledged the deal made between them.

Fronstin stated in the message, he spoke with his client, Jeffrey
Epstein, and agreed to the deal. Fronstin asked to call off the grand
jury as they would accept this deal. Belohlavic stated a probable
cause would be needed to book Epstein in the county jail and would let
me know as to when it would be needed. I explained my disapproval of
the deal and not being consulted prior to the deal being offered.
However I expressed that was only my opinion and the final approval
would come from the Chief of Police. She explained to have Chief

returned to the police station where I briefed the Chief about the

Reiter call Barry Krisher about the deal. I left the area and

deal offered.

I checked my voice mail messages and discovered a message from stepmother for the victim. She was calling because the State Attorney's Office still had not returned any of her calls as to when they are needed for this case. I then called ASA Belohlavic's office and left messages for her to call the victims on this case and explained to them what the State Attorney's Office had done.

On April 17, 2006, at approximately 4:30 pm, State Attorney Investigator Tim Valentine called to officially notify me of the cancellation of the Grand Jury. He requested I contact the victims that had been served to appear, to notify them of the cancellation. I advised Valentine that as this Grand Jury session was called based on the State Attorney's Office decision to have the victims heard by the Grand Jury that I felt it was the States Attorney's Office responsibility to contact the victims and advise them of the reason they were no longer needed.

As I had not received any contact from anyone at the State Attorney's Office, on May 1, 2006, I prepared three arrest warrant requests and submitted them to the State Attorney's Office. The packages were delivered to the Crimes against Children Unit in care of ASA Lana Belohlavek. Jeffrey Epstein's arrest warrant was requested for 4 counts of Unlawful Sexual activity with certain minors and one count of Lewd and Lascivious Molestation. Sarah Kellen, Epstein's assistant's, arrest warrant request was for 4 counts of Principal in the 1st degree Unlawful Sexual activity with certain minors and one count of Principal in the 1st degree Lewd and Lascivious Molestation. Haley Robson's arrest warrant request was for Lewd and Lascivious Acts on a victim under 16 years of age. The receipt of delivery was signed and brought back to the records division at the police department.

On May 3, 2006, at approximately 2:54 pm, I received a telephone call from ASA Daliah Weiss on my cellular telephone. ASA Weiss advised she

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has been taken off the Jeffrey Epstein case because her husband is
employed with Attorney Jack Goldberger. Attorney Goldberger is the
attorney of record for Jeffrey Epstein. His previous attorney, Guy
Fronstin, has been fired from representation. ASA Lana Belohlavek has
been assigned the case. ASA Weiss stated she can no longer speak
about the Epstein case with me. I thanked her for her telephone call.
ASA Weiss further stated that ASA Belohlavek would be calling me.

On May 10, 2006, information was received that Epstein's associate, Leslie Wexner, The Limited Inc, CEO's, plane had arrived in West Palm Beach, PBIA. The plane, a Gulfstream 4 bearing a N900LS registration, was on the tarmac at Galaxy Aviation. As Epstein had recently acquired the services of a new attorney, and the fact that Epstein's house is currently under remodeling, it was believed that Epstein may be in Palm Beach. I conducted physical surveillance at the residence, 358 El Brillo Way. I observed a large construction crew conducting remodeling at the house. The contractor, David Norr, was observed driving a Ford Explorer, white in color. The vehicle has a Florida registration of F30QQF. Norr left Epstein's house and traveled north on County Road. Det Caristo and I conducted surveillance on Norr. Norr traveled to several construction sites and checked on certain jobs. Surveillance was discontinued on Norr and Det Caristo and I traveled to Galaxy Aviation. I observed the white plane with a blue stripe along the body and tail of the plane; the tail number was visible on the bottom of the tail, closer to the body of the plane. We maintained visual surveillance on the plane until 4:57 p.m., when a caravan of Cadillac Escalades drove onto the tarmac. We observed several people exit the vehicles and discovered that they were part of the executive team for Limited Inc. The executives were in Palm Beach County for an executive meeting for the day. They arrived in Palm Beach County on May 9, 2006 at 9:30 pm and were scheduled to leave on the 10th at 5:00 pm.

On May 12, 2006, I met with ASA Lana Belohlavek at the State Attorney's Office. She explained that her boss, Barry Krischer, was requesting this case be taken to the Grand Jury again. I explained to her I had requested arrest warrants for Jeffrey Epstein, Sarah Kellen, and Haley Robson. I asked that she either issue the warrants or direct file, as so much time has elapsed since the original request to the Grand Jury. I explained that the Palm Beach Police Department had concluded the case in December of 2005 and has been waiting for the case to go forward. Belohlavek stated the original offer was again offered to the new defense attorney. She was waiting for their answer by Friday May 19, 2006. She stated she would advise me of the answer.

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ase No . . : 1-05-000368

Entered By .: ALTOMARO, NICKIE A

(Continued) 6/06/06

On May 22, 2006, I received several phone calls throughout the day from Mr. who stated he had been followed aggressively by a private investigator. Mr. stated that as he drove to and from work and running errands throughout the county, the same vehicle was behind him running other vehicles off the road in an attempt not to lose sight of Mr. wehicle.

I explained to him as Mr. Epstein had retained new legal council it was possible it would be new private investigators following him to observe his daily activities. I also explained to him that there was a meeting scheduled with ASA Lana Belohlavek and Attorney Jack Goldberger at Mr. Krischer's office scheduled on June 1, 2006 at 9:00 am. I attempted to call ASA Lana Belohlavek to inform her of the private investigators following Mr. however; she was on her vacation during the week of May 22 through May 30 2006.

On May 23, 2006, I received other phone calls from Mr. and Mrs. who advised they were able to acquire the private investigators license plate information. The subject following them was again driving very aggressively and caused Mrs. to run off the road. Mrs. stated the vehicle is a green Chevy Monte Carlo bearing Florida tag I35-XGA. The vehicle is registered to Zachary Bechard of Jupiter Florida. Bechard is employed with Candor Investigations from Jupiter, Florida. Bechard is a licensed Private Investigator in the State of Florida.

Since the discovery of the threat made against one of the victims in this case . I requested subpoenas for all calls made to and received from . during the month of March 2006 for her cell phone and home phone. I had confirmed with Florida State University the exact dates of Spring Break for 2006. The Spring Break was from March 4, 2006 through March 12, 2006. I received a subpoena from Sprint/Nextel with all calls made during the month of March 2006. I reviewed the 989 calls made and received during the month of March 2006. I observed on March 7, 2006, made and received thirty five calls during that day.

Date 7-Mar-06	Time 11:03 AM	Seconds 492	In/Out Outbound	To/From 561XXXX	
7-Mar-06	11:16 AM	6	Inbound	561XXXX	
7-Mar-06	11:22 AM	887.2	Inbound	561XXXX	
7-Mar-06	11:37 AM	48	Outbound	9178553363	
7-Mar-06	11:39 AM	28.2	Inbound	2125356831	
7-Mar-06	12:02 PM	727.2	Inbound	2125356831	

The table reflects the date of the calls, time of day (EST), duration

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.se No. . . : 1-05-000368 of call in seconds, inbound or outbound calls and calls made to or from phone. On March 7, 2006, at 11:03 am, made a call to the victim which lasted 492 seconds (8 minutes and 2 seconds). The victim then returned the call at 11:16 am which lasted 6 seconds. The victim then made contact with at 11:22 am for 877.2 seconds (14 minutes and 6 seconds). These sequences of calls were consistent with what the victim had described to me on the date of the intimidation. Immediately after speaking with the victim, makes a call to Sarah Kellen, Epstein's assistant, which lasts for forty-eight seconds. A call is then immediately received, a telephone number registered to a Corporation affiliated with Jeffrey Epstein located at 457 Madison Ave in New York. An extensive computer check revealed 457 Madison Ave is a business address in which Epstein has his corporations assigned to. Epstein had corporation attorney, Darren Indyke, register the businesses and register himself as an agent. I also observed Epstein has his El Zorro Ranch Corporation, New York Strategy Group, Ghislaine Corporation, J Epstein and Company and the Financial Strategy Group registered to this same address. Finally, a third call is received by at 12:02 pm from the same corporate number which lasts 12 minutes and 1 second. It should be noted that there is no further contact with either the victim during the month of March or April of 2006. I also noted that there was no further contact with Sarah Kellen or Jeffrey Epstein during the remainder of the month of March or April 2006.

On June 1, 2006, ASA Lana Belohlavek telephoned me to inform me of the meeting that occurred with Atty. Jack Goldberger and her reference this case. She advised she would make her determination on whether to file on this case or not by Monday June 5, 2006.

Inv Continues.

On June 29, 2006, I had spoken to ASA Lana Belohlavic who informed me that the case would be sent to the Grand Jury for charges. She informed me that the grand jury would convene on July 19, 2006 to hear the Epstein case. Belohlavic stated State Attorney Barry Krisher made the determination to go the Grand Jury to hear the case.

On July 12, 2006, I spoke with Mrs. mother of the victim, who inquired about the status of the case. I explained to her that I was told we would be going to the Grand Jury during the week of July 19, 2006. She stated she had not been contacted as of yet by the State Attorney's Office for any information. I provided her with the telephone numbers to the State Attorney's Office.

Investigation continues . .

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Date/Time: 10/16/06 / 9:24:44

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Case Number: 1-05-000368

Reported By: RECAREY, JOSEPH Entered By:: ALTOMARO, NICKIE A. NA

On July 18, 2006, I received a Grand Jury letter to appear before the Grand Jury on July 19, 2006, reference the Jeffrey Epstein case. On July 19, 2006, I responded to the Grand Jury Room and testified before the grand jury. At the conclusion, ASA Belohlavec stated the grand jury returned with a true bill for Felony Solicitation of Prostitution.

On July 25, 2006, Epstein turned himself into the county jail and was released on a \$3,000 bond. Epstein is to return for arraignment on August 25, 2006 at 8:45 am.

ATT POLICE CLERKS: Please show this case cleared by arrest with the arrest of Jeffrey Epstein W/M 01-20-1953.

** End of Report **



January 4, 2024

VIA ECF

The Honorable Loretta A. Preska District Court Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Giuffre v. Maxwell, Case No. 15-cv-7433-LAP

Dear Judge Preska,

Plaintiff is filing a revised version of docket entries 173-8, 180-1, 180-2, 235-10 pursuant to the Court's January 4, 2024, Order. *See* ECF No. 1324.

Respectfully,

/s/ Sigrid S. McCawley
Sigrid S. McCawley

cc: Counsel of Record (via ECF)