



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,

Pursuant to the Court's December 18, 2023, unsealing order, and following conferral with Defendant, Plaintiff files this set of documents ordered unsealed. The filing of these documents ordered unsealed will be done on a rolling basis until completed. This filing also excludes documents pertaining to Does 105 (*see* December 28, 2023, Email Correspondence with Chambers), 107, and 110 (*see* ECF No. 1319), while the Court's review of those documents is ongoing.

Respectfully,

/s/ Sigrid S. McCawley
Sigrid S. McCawley

cc: Counsel of Record (via ECF)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
VIRGINIA L. GIUFFRE,

Plaintiff,
v.
GHISLAINE MAXWELL,

Defendant.

-----X

15-cv-07433-RWS

**RESPONSE TO NON-PARTY SHARON CHURCHER'S
MOTION TO QUASH SUBPOENA**

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Defendant Ghislaine Maxwell files this Response to Non-Party Sharon Churcher's Motion to Quash Subpoena, and states as follows:

INTRODUCTION

Ms. Maxwell seeks documents and testimony from Sharon Churcher ("Churcher") that are critical to the defense of this single count defamation case. Churcher is the only person with much of the information that will prove the truth defense.

The alleged defamatory press release at issue in this case states:

"Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms. Roberts that Alan Dershowitz is involved in having sexual relations with her, which he denies.

Ms. Roberts claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory."

Churcher is the sole source of information regarding the original story told by Plaintiff, and was the author of the first articles publishing Plaintiff's claims. She was actively and personally involved in changing those stories over time and in the creation and addition of new salacious details about public figures, including the fabrication of Alan Dershowitz's alleged sexual relations with Plaintiff.

Sharon Churcher's attempt to avoid the subpoena for deposition and production of documents based on the journalist Shield Law must fail for three reasons. First, much of the discovery sought is unrelated to any news gathering activities. Rather, Churcher was acting as a friend and advisor to Plaintiff in Plaintiff's efforts to write and publish a book, sensationalizing her story in a manner that would best boost the publicity, publication and sales of that work of fiction. In that role, she helped manufacture some of the stories that have been denied and that are the central issues in this case.

Second, in certain instances, Churcher was also acting as a source for information to Plaintiff's counsel and law enforcement agencies, specifically stating that she was not acting in her capacity as a journalist. In these instances, she was not gathering news for publication, she was providing information she had already gathered. Providing this information to third parties waived any qualified privilege that ever arguably existed.

Finally, to the extent that any information sought is covered by the qualified protection of Civil Rights Law § 79-h(c)¹, Ms. Maxwell provides a clear and specific showing that the information is highly material or relevant, critical or necessary to the Ms. Maxwell's truth defense, and not obtainable from any alternative source. As such, the Shield Law requires compliance with the subpoena.

For these reason, the Motion to Quash should be denied, and Churcher should be compelled to comply with the Subpoena, as modified herein.

ARGUMENT

I. CHURCHER IS A MATERIAL FACT WITNESS AND WAS NOT ACTING AS A JOURNALIST

The New York Shield law relied on by Churcher is *only* applicable where a professional journalist is asked to disclose information they have received "*in the course of gathering or obtaining news for publication.*" 79-h(b) &(c). Much of the information sought from Churcher has nothing to do with information she gathered or collected in the course of gathering news for publication. Rather, it relates to advice, information and communications that she had with Plaintiff in her capacity as a friend and advisor. "Section 79-h is not applicable where the journalist is called upon, as other citizens, to testify with respect to personal observations"

¹ As discussed in detail below, the undersigned has informed Churcher's counsel that the Subpoena is not intended to cover any information from confidential sources. Thus, the absolute privilege found in Civil Rights Law § 79-h(c) is inapplicable

Solargen Elec. Motor Car Corp. v. Am. Motors Corp., 506 F. Supp. 546, 551 (N.D.N.Y. 1981); *People v. Dupree*, 88 Misc. 2d 791, 796, 388 N.Y.S.2d 1000, 1003 (Sup. Ct. 1976) (“the privilege does not exist if the newsman is called on to testify what he personally observed.”).

In this single count defamation action, Churcher is being called as a witness to testify regarding events that she personally observed and *in which she participated*. This case is about whether the information included in the December 2014 Joinder Motion that Ms. Maxwell called obvious lies were, in fact, lies. These included allegations about Plaintiff’s alleged sexual interactions with Alan Dershowitz and Prince Andrew, specifically referenced in Ms. Maxwell’s denial statement. Not only is Churcher aware that the allegations were false, she helped Plaintiff concoct the stories.

A. Churcher was acting as a friend and advisor to help Plaintiff publish her book, not as journalist

As set out in Churcher’s Declaration, she first met with Plaintiff in early 2011 and conducted a weeks-long series of extensive interviews in person with Plaintiff, leading to a string of publications in March of 2011. As Churcher stated, her focus in these articles was Prince Andrew. After the interviews and the publication of the March 2011 stories, Churcher continued regular contact with Plaintiff as her friend and business advisor. *See* Menninger Decl. Ex. A, p. 5-7, 10, 12, 19, 24-25, 30, 32, 35, 37-38, 48, 51, 61 & 68. Churcher encouraged Plaintiff to write a book and to begin pursuing publishing contracts as soon as her exclusivity with the Mail on Sunday was over in May 2011. Menninger Decl. Ex. A, p. 2, 5. Churcher recommended a variety of ghost writers and agents to Plaintiff for this purpose, all as Plaintiff’s friend, advisor and advocate. *See* Menninger Decl. Ex. A, p. 5, 9, 10, 12, 15, 25, 30, 32, 35, 37, 38, 42, 48, 50 & 60. Churcher also initiated contact with the US Attorney’s office and FBI on behalf of

Plaintiff, setting up their initial meeting where Churcher planned to be present at that meeting “for support,” not in her capacity as a journalist. Menninger Decl. Ex. A, p. 3.

Plaintiff did begin writing her book and sent versions of her manuscript to Churcher for her review and comment – again, in her capacity as a friend, not as a journalist. Menninger Decl. Ex. A, p. 59. Churcher also had extensive discussion with Plaintiff on the best strategies for getting interest in her book, including determining when to “name names” Menninger Decl. Ex. A, p. 63. She strategized with Plaintiff and Plaintiff’s counsel, Brad Edwards, on how to use a potential Vanity Fair article as book publicity by dropping names of famous politicians, claiming she was sex trafficked, but refusing to provide additional information because she was writing a book. Menninger Decl. Ex. A, p. 51-58.

Through some of these communications between Plaintiff and Churcher, it is obvious that stories in the book – later to become allegation in the Joinder Motion – were created and supported based on the suggestions of Churcher. They were not reported by Plaintiff in her initial interview, or in Churcher’s initial publications, because they did not occur.

B. Churcher prompted Plaintiff to fabricate stories regarding Prince Andrew

In 2011, when Churcher first reported on Plaintiff’s story after having just spent weeks interviewing Plaintiff in Australia, and with a particular focus on reporting Plaintiff’s meeting Prince Andrew, Churcher specifically reported: “[t]here is no suggestion that there was any sexual contact between Virginia and Andrew, or that Andrew knew that Epstein paid her to have sex with his friends.” Churcher Decl., Ex. 2, p. 6/34. Shortly thereafter, on March 20, 2011, Churcher emailed Plaintiff explaining to her how she can corroborate a story to tell the FBI – that she was “given to” Prince Andrew. Menninger Decl., Ex. A, p. 8. Churcher provided an explanation for how Plaintiff can substantiate the claim – a claim not previously made by Plaintiff.

The December 2014 Joinder Motion is the first publication of alleged sexual interaction between Plaintiff and Prince Andrew. At some point between March 2011 and January 2015, Churcher requested that Plaintiff handwrite a diary describing her alleged sexual encounters with Prince Andrew. Attached to the Churcher Declaration at Exhibit 7 is an Article subtitled “Diary Entries Of ‘Teen Sex Slave’ Detail Sorted Hook-Up With Prince Andrew – In Her Own Handwriting.” The article claims to print excerpts of a contemporaneous journal kept by Plaintiff when she was 17, stating “In a bombshell world exclusive, RadarOnline.com has exclusively obtained the secret journal of the then 17-year-old employed to have sex with billionaire pedophile Jeffrey Epstein and his rich and powerful pals — and it’s packed with scandalous claims about her illicit trysts, including with Andrew, the fifth in line to the British throne.” Churcher Decl. Ex. 7. This alleged 24 page “diary” or “journal” was a completely fabricated document handwritten by Plaintiff at the request and direction of Churcher. See Menninger Decl. Ex. B, p. 207-208; 226-231² Plaintiff maintains she did not keep a copy of this handwritten “diary,” leaving the only source of the complete document and information about its creation with the person who asked for the document’s fabrication – Churcher.³

If there was no suggestion of sexual contact with Prince Andrew as of March 2, 2011, how and when was this story first created? From the email correspondence, it appears that Churcher was directly involved in inventing this story during the course of creating stories for a book – stories that would generate the interest of publishers. Churcher’s testimony on how the Prince Andrew allegation was first created is direct evidence in this case.

² In actuality, the only journal Plaintiff ever maintained that might contain relevant information was purposefully destroyed by Plaintiff in a bonfire in 2013, at a time when she was represented by counsel and actively trying to insert herself as a Plaintiff in the CVRA case. Menninger Decl., Ex. B, p. 205-209.

³ To the extent Churcher argues that the creation of this “diary” was somehow part of the news “gathering” process, it was clearly not confidential, and the test requiring production of the non-published portions, discussed below, is met – the information is highly relevant, critical to the defense, and available from no other source.

C. Churcher prompted Plaintiff to invent stories regarding Alan Dershowitz

Churcher's direct involvement in creating the allegations in the Joinder Motion regarding Plaintiff's alleged sexual interactions with Alan Dershowitz – or even the knowledge of Alan Dershowitz' name – is even more apparent. Prior to the December 2014 joinder Motion, there is not a single mention of Mr. Dershowitz in any pleading related to Plaintiff. In Churcher's March 2011 publications, directly after she interviewed Plaintiff, there was not a single mention of Mr. Dershowitz. It is quite apparent that Plaintiff had never met Mr. Dershowitz or reported that he was a person with whom she had had sexual relations.

In the May/June 2011 timeframe, Plaintiff and Churcher's communications relate primarily to Plaintiff's draft of her novel, hiring a ghostwriter, and requests for advice on how to manage agent and book publication deals. Menninger Decl. Ex. A. As a part of those communications, on May 10, 2011, Plaintiff writes Churcher:

"Hello gorgeous, I hope this message comes to you on a bright, sunny day!!! I took your advice about what to offer Sandra [a ghostwriter] and she accepted. We're drawing up a contract through her agent right now and getting busy to meet my deadline. Just wondering if you have any information on you from when you and I were doing interviews about the J.E. story. I wanted to put the names of these assholes, oops I meant to say, pedo's, that J.E. sent me to. With everything going on my brain feels like mush and it would be a great deal of help!..."⁴

In an e-mail dated May 11, 2011, Churcher replies to Plaintiff:

"Don't forget Alan Dershowitz... JE' s buddy and lawyer -good name for your pitch as he repped Claus von Bulow and a movie was made about that case ... title was Reversal of Fortune. We all suspect Alan is a pedo and tho no proof of that, you probably met him when he was hanging out w JE"

Menninger Decl. Ex. A, p. 26-28.

⁴ This email raises its own issues. If Plaintiff was providing her own personal information regarding what allegedly happened to her, why would she require information from Churcher from their interviews about whom she had been 'trafficked' to. What information did Churcher provide to Plaintiff that was the basis for Plaintiff's various allegations, as opposed to being factual information based on events that happened to Plaintiff?

Sometime thereafter, Plaintiff did insert Mr. Dershowitz's name in her book manuscript but she did not allege therein that she had any sexual relations with him, rather she simply referred to him as a business acquaintance of Mr. Epstein's. It was not until the Joinder Motion in December 2014 that she claimed she engaged in sexual relations with Mr. Dershowitz, something he adamantly and publicly denied.

At the heart of this case is the question of whether Ms. Maxwell defamed Plaintiff by calling her a liar. Of course, if Plaintiff is a liar, then there is no defamation. Churcher had direct and actual knowledge that Plaintiff is a liar and helped orchestrate specific and incredible public lies in concert with Plaintiff relating to Prince Andrew and Alan Dershowitz. In both of these instances, Churcher is not acting as a journalist – she is acting as a friend and advisor to Plaintiff on how to drop names – truth be damned – to try to sell Plaintiff's book. As Churcher puts it, the only incentives are “deadlines and/or cash”. Menninger Decl., Ex. A, p. 12. Churcher is not a journalist; she is a co-conspirator in Plaintiff's publication of false statements regarding numerous people including Prince Andrew, Alan Dershowitz and Ms. Maxwell. It is the denial of the defamatory claims Churcher helped create that is the basis of this defamation suit. There is no reporter shield over these factual matters that are not related to new gathering.

D. Churcher's communications with Plaintiff's Counsel and Law Enforcement are not news-gathering activities

Churcher also admits to communicating regularly with Bradley Edwards, now Plaintiff's counsel, and other agents for Plaintiff, which communications continue through the present day. *See* Churcher Decl., ¶¶ 9-10. Churcher is the person who initially put Plaintiff in contact with Edwards. *See* Menninger Decl., Ex A, p. 7. Churcher coached Plaintiff on how to use Edwards to provide information to reporters in a manner that would best help her book sales. *See* Menninger Decl., Ex A, p. 51-58. According to Plaintiff, she regularly shared information from

Edwards with Churcher, although she could not specify the attorney-client privileged information she shared. Menninger Decl. Ex. B, p. 297-300. None of the communications or correspondence with Edwards, or any of Plaintiff's other attorneys, are in a news gathering capacity, and are not covered by the Shield Law.

Likewise, Churcher apparently corresponded with the FBI and US Attorney's office regarding Plaintiff, and specifically states she is not acting in her journalistic capacity. Menninger Decl. Ex A, 3. Communications that occurred that were not forwarded or copies to Plaintiff have not been produced. Churcher specifically states that she would like to be treated as a confidential *source* of information. *Id.*, p. 8. She is not *gathering* news, she is attempting to assist law enforcement and providing them with information she has gathered. First, this is not news gathering activity, and clearly not related to confidential source. Even if there was some claim of qualified privilege, having shared information with the FBI or other law enforcement, there is a waiver of any protection of the Shield Law. *See Guice-Mills v. Forbes*, 12 Misc. 3d 852, 857, 819 N.Y.S.2d 432, 436 (Sup. Ct. 2006) (professional journalist waived the exemption of the Shield Law if they voluntarily disclose or consent to disclosure of otherwise covered information to third parties).

None of the documents or information described above is covered by the New York Shield Law because Churcher was not engaged in the news-gathering process. Regardless, there is no proof that *any* of the information sought by Ms. Maxwell in the subpoena is confidential information from a confidential source, nor was it intended kept confidential. The requested information must be produced and Churcher deposed as her testimony is critical to the truth defense in this case.

II. THE ABSOLUTE PRIVILEGE OF THE SHIELD LAW IS NOT APPLICABLE BECAUSE THERE WAS NO EXPECTATION OF CONFIDENTIALITY

As with all attempts to block the discovery of relevant information “[t]he burden rests upon the [party invoking privilege] to demonstrate that the material is privileged.” *People v. Wolf*, 39 A.D.2d 864, 864, 333 N.Y.S.2d 299, 301 (1972). “To successfully raise a claim of privilege under this statute, the information must be imparted to the reporter under a ‘cloak of confidentiality’. There had to be an understanding, express or implied, that the information will not be disclosed” *People v. Bova*, 118 Misc. 2d 14, 19, 460 N.Y.S.2d 230, 233 (Sup. Ct. 1983); *Hennigan v. Buffalo Courier Express Co., Inc.*, 85 A.D.2d 924, 446 N.Y.S.2d 767 (“The confidential relationship with the source must first be established in order to determine the interest to be balanced against that of a civil litigant. Full disclosure is the general rule and the burden of showing immunity from disclosure is on the party asserting it”); *People v. LeGrand*, 67 A.D.2d 446, 415 N.Y.S.2d 252; *Matter of WBAI-FM v. Proskin*, 42 A.D.2d 5, 344 N.Y.S.2d 393; *Matter of Wolf*, 39 A.D.2d 864, 333 N.Y.S.2d 299; *Davis v. Davis*, 88 Misc.2d 1, 386 N.Y.S.2d 992).

Churcher admits that her conversations and communications with Plaintiff were not made with any expectation of confidentiality. Indeed, quite the opposite. The express reason for the communication was to obtain press coverage and to cause the publications of the series of articles written and published by Churcher. Plaintiff was paid over \$140,000 to go “on record.”

With respect to any other “source” of information over which Churcher claims an “absolute” privilege, there is no issue. Ms. Maxwell is not seeking this information. Ms. Maxwell recognizes that there are occasions in which Churcher attributes information to a confidential source. Ms. Maxwell does not seek to compel documents relating to these limited individuals, to the extent the information and source was not later revealed, and will not question

Churcher on these sources except to determine if they have later been identified with their permission. The undersigned informed Ms. Churcher's counsel in their conferral that she would not seek information relating to confidential sources.

Respecting identified sources, Churcher fails to carry the burden of showing that there was an expectation of confidentiality, which is her burden to carry. Indeed, in her declaration she admits that she had conversations with Plaintiff's attorney, Bradly Edwards, and law enforcement agencies *that were not intended to be kept confidential*. See Churcher Decl. ¶¶ 9 & 11. In her articles, she specifically identifies the sources of her information, demonstrating the lack of confidentiality. Plaintiff simply cannot carry the burden of claiming any absolute privilege under 79-h(b).

III. THERE IS A COMPELLING NEED FOR CHURCHER'S DOCUMENTS AND TESTIMONY

Having failed to establish the essential element of confidentiality, Churcher attempts to claim a qualified protection. *Matter of Sullivan*, 167 Misc. 2d 534, 538, 635 N.Y.S.2d 437, 440 (Sup. Ct. 1995) (source "had no understanding or expectation of confidentiality with either Mr. Hurley or the police detectives regarding the viewing of the interrogation. Consequently, there is no *absolute* privilege which protects the movant's materials, *see* Civil Rights Law § 79-h(b), and therefore any protection that might be afforded to the journalistic material can only be of a qualified nature."). Churcher relies on qualified protection relating to non-published news gathering information, which requires Ms. Maxwell make a clear and specific showing that the information is: (1) highly material and relevant; and (2) critical or necessary to the litigant's claim or defense; and (3) not obtainable from any alternative source. *Matter of Sullivan*, 167 Misc. 2d 534, 537-38, 635 N.Y.S.2d 437, 440 (Sup. Ct. 1995); [Civil Rights Law 79-h](#) (c). As discussed above, this provision is only applicable where a journalist is acting in a news gathering

capacity. Ms. Maxwell proffers the following clear and specific showing establishing each of these elements, requiring production of the information sought and deposition of Churcher.

A. The Information Sought from Churcher is Highly Material and Directly Relevant

This is a case about whether or not allegations in the Joinder Motion were lies, in particular the claims about Ms. Maxwell, Prince Andrew and Alan Dershowitz, which are the specific items that were denied in Ms. Maxwell's press release. The information sought from Churcher is highly material in proving that that each time the story is told, new salacious details are added – the alleged defamatory statement. Indeed, it could be the most probative evidence in this case.

“In determining whether the defendant has made a clear and specific showing that the information sought is critical or necessary to [her] defense, this court should not ‘substitute its judgment for a defendant's on the question whether such evidence is ‘necessary and critical’ to a defense.” *Matter of Sullivan*, 167 Misc. 2d 534, 540, 635 N.Y.S.2d 437, 441 (Sup. Ct. 1995) (quoting *United States v. Sanusi*, 813 F.Supp. 149, 160 (U.S.Dist.Ct.E.D.1992)).

Starting with Ms. Maxwell, Churcher's articles directly conflict with the allegations in the Joinder Motion and Plaintiff's testimony in this case. First, Churcher's original article reports the following regarding Plaintiff's first visit to Mr. Epstein's mansion:

“I'd get training and be paid well. Virginia's father gave his blessing, believing his daughter was being handed the opportunity to learn a skill and to work for a wealthy and respectable employer.
He drove her to Epstein's pink mansion on the Palm Beach waterfront . . .

Virginia says: ‘Ghislaine said I was to start immediately and that someone would drive me home.

My father left and I was told to go upstairs.’ ***She was led by another woman*** through Epstein's bedroom into a massage room where he lay face down naked on a table.

He started to interview Virginia. This was unconventional, but Virginia had no suspicions. Presumably, she thought, this was how the wealthy conducted their business.

Epstein elicited the information that Virginia had been a runaway, and was no longer a virgin. Virginia was then told to start massaging Epstein, ***under the instructions of the woman who had shown her in.*** The massage quickly developed into a sexual encounter.

Churcher Decl., Ex. 2, p. 4/34; See also Churcher Decl., Ex. 5, p. 3/13.

Churcher later reports that Ms. Maxwell hired girls for Epstein. In this story, she alleges Ms. Maxwell escorted Plaintiff to meet Mr. Epstein, but nowhere claims that Ms. Maxwell engaged in any sexual interaction with Plaintiff at any time. See Churcher Decl., Ex. 4, p.1-6.

The Joinder Motion alleges that it was Ms. Maxwell that took Plaintiff to Mr. Epstein's room on her first visit to the mansion, and allegedly participated in a sexual interaction – a claim never before made. Ex. C. Obviously, Churcher's notes, interviews and recordings are directly relevant to Plaintiff's original story about Ms. Maxwell, and how it has changed and morphed over time, as well as the motivation for those changes.

The next allegation that has mutated with time in Churcher's stories and in the Joinder Motion relates to Plaintiff's age when she first met Epstein and the amount of time she spent working for him. In Churcher's first story, she published that Plaintiff first met Epstein in 1998, soon after her 15th birthday, and worked for him for four years. Churcher Decl., Ex. 1, p. 3/34; Ex. 5, p. 2/31. The Joinder Motion alleges that Plaintiff met Epstein in 1999, when she was 15. Both the year and the time of year are material to this case.

Plaintiff now admits that she did not meet Epstein in 1999, but rather met him in 2000 which was the year she worked at the Mar-A-Lago. Plaintiff's claims about meeting Epstein in 1998 or 1999, and her claim of being 15, are lies. Plaintiff still claims, however, that she was 16 years old at the time she met Epstein. Menninger Decl., Ex. B, p. 104. Despite efforts to obtain

records from the Mar-A-Lago, they have no records of Plaintiff's dates of employment to establish the timeframe. Churcher is a witness with information fixing the month when Plaintiff claims to have met Epstein, i.e. soon after her birthday in August. In light of the now admitting year – 2000 – Plaintiff would have been 17 at the time.

Other highly relevant information in Churcher's sole possession is the identification of what documents and information Plaintiff was shown *by Churcher*, including flight logs, pictures, or other witness statements. For instance, based on email correspondence, it appears that Churcher was in possession of Epstein's flight logs. There is no indication that Plaintiff had seen those flight logs prior to meeting Churcher. Plaintiff never mentions certain names that appear in the flight logs prior to Churcher's meeting with her in February 2011. By way of example, Bill Clinton is referenced in the flight logs. Before 2011, Plaintiff never mentioned or references President Clinton. Yet, suddenly and out of thin air, Plaintiff allegedly reports to Churcher in 2011 that she met Bill Clinton twice, and that Ms. Maxwell flew President Clinton on a helicopter to Mr. Epstein's Island – a story which has since been fully discredited as a lie. This is simply one example of names and stories that were mysteriously added to Plaintiff's story, likely through Churcher's suggestive questioning and presentation of documents to Plaintiff. The only person who can testify on this highly relevant matter, including what documents were shown to Plaintiff, is Churcher.

Churcher also reported that Plaintiff was sent by Epstein (and Epstein alone) to meet with men including “a well-known businessman (whose pregnant wife was asleep in the next room), a world-renowned scientist, a respected liberal politician and a foreign head of state.” Churcher Decl., Ex. 2, p. 5/34. By contrast, the Joinder Motion alleges “Epstein also trafficked Jane Doe #3 [Plaintiff] for sexual purposes to many other powerful men, including numerous prominent

American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders.” Menninger Decl., Ex. C. Notably, Plaintiff has not identified any foreign presidents, a prime minister, a foreign head of state, a world-renowned scientist or numerous “prominent American Politicians” in her Rule 26 disclosures in this case. So the question is, who did Plaintiff identify to Churcher in 2011, and how has that list changed and expanded over time. Only Churcher can provide this information.

Churcher’s publications in March of 2011 were the first publication containing the now widely publicized picture of Plaintiff with Prince Andrew. Plaintiff was well paid for this picture, and continued to get royalties on the reprints. Despite multiple requests, Plaintiff has not been able to produce or provide the actual native version of the picture, or identify the specific date it was taken. Given that Churcher was the first news source to print the picture, and later worked with the FBI to provide information, she is likely the person who has the photo, or knows the chain of custody of the picture. Either way, information including the date and location where the picture was taken are relevant. Churcher is the only person who may be able to provide the information to track down the picture, or may have it herself.

The interview notes, recordings, memos and other documentation in Churcher’s possession regarding Plaintiff are highly probative, material and directly relevant to Plaintiff’s fabrication and expansion of claims. For instance, if Plaintiff specifically told Churcher that she only met, but did not have sexual relations with, Prince Andrew in early 2001, the statement in the Joinder Motion is a lie. Given that Churcher reported that there is “no indication of sexual interaction with Prince Andrew,” in 2011 only Churcher can provide testimony or notes reflecting the basis for that published statement.

B. Churcher's documents and testimony are critical to Ms. Maxwell's truth defense and Plaintiff's claims

As stated in the Motion to Quash, the “highly relevant” and “critical or necessary to the litigant's claim or defense” prongs of the test for overcoming a qualified privilege largely overlap. In this single count defamation action, this is particularly true. As can be seen by the clear and specific showing above, all of the information sought from Churcher is critical to the defense of substantial truth.

It is well settled that truth is an absolute defense to a claim of defamation. “Under New York law, it is well-settled that truth is an absolute, unqualified defense to a civil defamation action. It is an equally fundamental concept that substantial truth suffices to defeat a charge of libel.” *Jewell v. NYP Holdings, Inc.*, 23 F. Supp. 2d 348, 366 (S.D.N.Y. 1998) (internal quotations and citations omitted). In examining the role of Churcher's testimony and documents to this defense, it is important to look at the actual text of that press statement::

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms. Roberts that Alan Dershowitz is involved in having sexual relations with her, which he denies.

Ms. Roberts claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory.

Ex. D

As demonstrated above, Ms. Churcher's documents and testimony are critical to establishing the fact that each time Plaintiff has told her story it changes and new salacious details are added.

Likewise, Churcher admits that her testimony is relevant to Plaintiff's credibility. While a journalist testimony relating to impeachment or credibility of a party may not *normally* be critical, it is here. Plaintiff's credibility, or lack thereof, is the central issue in the case. This is not merely impeachment evidence, it is the crux of the case. If Plaintiff is a “liar” defense of

truth is established. Likewise, it establishes that there can be no damages caused by the alleged defamatory statement. Again, Churcher's documents and testimony are central to this issue.

C. Churcher's information cannot be obtained from an alternative source.

Churcher claims that there are other sources for the information sought, citing almost exclusively the Plaintiff as the potential source of information. This argument is flawed for two reasons. First, Plaintiff claims that she does not have much of the information sought, or simply can't remember. In her deposition, she said she cannot remember where the photograph is, where the contract is, what she told Churcher, and she refused upon advice of counsel, to state what stories Churcher "got wrong." See Motion to Re-Open Deposition of Plaintiff. Second, as the direct adversary in this case, Plaintiff is not a reliable source for information, and thus cannot be deemed an alternative source. *Matter of Sullivan*, 167 Misc. 2d 534, 541, 635 N.Y.S.2d 437, 442 (Sup. Ct. 1995) (compelling journalist notes, records, and videotapes of interrogation where claimed alternative source of information – detectives conducting the interrogation – were adversaries and thus could not be deemed the reliable source for information)

For most information, Churcher is the **only** source of the information sought. She is the only person who can provide the following information and documents:

- The 24 page fabricated diary, and testimony on when and why it was created⁵
- Notes, transcriptions, tape recordings, and memorandum from her interviews with Plaintiff, including her week long interviews in Australia;⁶
- Churcher's communications with law enforcement or the FBI concerning Plaintiff;⁷

⁵ Plaintiff contends that she gave the original to Churcher, and did not maintain a copy. Ex B, p. 229.

⁶ Plaintiff has produced some email communications with Churcher, although in light of Plaintiff's statements concerning the regular deletion of emails, there are likely email communications that were not captured by Plaintiff in Ms. Churcher's possession or control. Nevertheless, to minimize the burden, Ms. Maxwell will voluntarily limit documents containing communication with Plaintiff by eliminating email communications between Plaintiff and Churcher using Plaintiff's [REDACTED] address. Because Plaintiff did not produce documents from her hotmail account and only recently produced documents from her iCloud account, Ms. Maxwell requests that Churcher search for documents to or from Plaintiff at these two email address.

⁷ Ms. Maxwell has filed a FOIA request and had not received a response.

- Plaintiff's contract with the Mail on Sunday, which Plaintiff claims she no longer has;⁸
- The original Prince Andrew picture, or information on its chain of custody;
- Communications with Brad Edwards and other attorneys for Plaintiff⁹

From a testimonial standpoint, only Churcher can testify about the deviations in the stories she has heard from Plaintiff because only Churcher was there. Plaintiff herself claims she cannot remember what she told Churcher at various points in time, and herself asked Churcher for the notes from her interview so Plaintiff could remember what she said. Menninger Decl., Ex. A, p. 26. Plaintiff further refused to testify about what information Churcher printed that was untrue or varied from what Plaintiff told Churcher. Menninger Decl., Ex. B, p. 215-226. Thus, the only person who can testify or provide documentary evidence about Plaintiff's stories to Churcher is Churcher.

In light of the critical nature of the documents and testimony in establishing the truth defense and the fact that the information simply is not available from other sources, Churcher is not entitled to claim qualified privilege over her news-gathering materials or non-published non-confidential information.

IV. MS. MAXWELL'S COUNSEL AGREED TO EXTEND THE RETURN DATE FOR COMPLIANCE WITH THE SUBPOENA

Churcher's final argument for a Protective Order – that there was not a reasonable time to respond – is defeated by the admission in her own pleading. It is true that the original response date was twelve days after service – two days less than is considered presumptively “reasonable.” Ms. Maxwell's counsel readily agreed that if Churcher intended to respond and comply with the subpoena rather than moving to quash, that the response date would be extended

⁸ Ex. 247-248

⁹ This information had been requested in discovery to Plaintiff, but no documents have been produced. Ms. Maxwell has also subpoenaed the information from Plaintiff's attorneys, each of whom has moved to quash. There can be no question that Ms. Maxwell has exhausted every possible source for obtaining this information.

and the deposition would be scheduled at a mutually agreeable time. As such, there is no basis for quashing the subpoena based on the “unreasonable time” argument, as Churcher was on notice that she would be given the time needed to obtain the documents requested. In light of the discovery cut-off in this case, however, if a motion to quash was forthcoming, the matter needed to be resolved to permit completion of discovery.

WHEREFORE, for the forgoing reasons, Ms. Maxwell requests that the Court deny the Motion to Quash, and compel deposition and the Production of Documents by Sharron Churcher pursuant to the subpoena, as modified by footnote 6 herein.

Dated: June 22, 2016

Respectfully submitted,

/s/ Laura A. Menninger

Laura A. Menninger (LM-1374)
Jeffrey S. Pagliuca (*pro hac vice*)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303.831.7364
Fax: 303.832.2628
lmenninger@hmflaw.com

Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on June 22, 2016, I electronically served this *RESPONSE TO NON-PARTY SHARON CHURCHER MOTION TO QUASH SUBPOENA* via ECF on the following:

Sigrid S. McCawley
Meredith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsflp.com
mschultz@bsflp.com

Bradley J. Edwards
FARMER, JAFFE, WEISSING, EDWARDS,
FISTOS & LEHRMAN, P.L.
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
StanPottinger@aol.com

/s/ Nicole Simmons
Nicole Simmons

EXHIBIT A

To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
 From: Jenna
 Sent: Mon 3/7/2011 10:55:59 AM
 Importance: Normal
 Subject: RE: Re:
 Received: Mon 3/7/2011 10:55:59 AM

Hi again,
 Thanks alot for understanding, I appreciate all that you are helping me with. It's going to be splendid weather tomorrow! :-) We should meet at the kids water gym next to where you went to watch the pelicans feed.
 See you then...
 Take care,
 Jenna

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

From: Sharon.Churcher@mailonsunday.co.uk
 Sent: Monday, 7 March 2011 8:46 PM
 To: Virginia Giuffre
 Subject: Re:

All understood. A lot of people are rooting for you.
 You must do what is best for you and your family.
 Where shall we meet? (Glorious weather....)

|----->
 |From: |
 |----->

 >-----|
 |----->
 |To: |
 |----->
 >-----|
 |Sharon Churcher
 >-----|
 |----->
 |Date: |
 |----->
 >-----|
 |07/03/2011 09:28 GMT
 >-----|
 |----->
 |Subject: |
 |----->
 >-----|
 |RE:
 >-----|

Hi shazza,
 That will be great if we can arrange the wire tomorrow, much appreciated buddy! If you don't mind my husband and I would like to be alone with the phone conversation taking place tomorrow, we just have some serious things to think about and our families well being comes first. I'll fill you in over lunch tomorrow. We were thinking of meeting you at The entrance instead. There's really nice alfresco dining and great for the kids to play. What do you think? See you then...
 Take care,
 Jenna

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

From: Sharon.Churcher@mailonsunday.co.uk
 Sent: Monday, 7 March 2011 6:22 PM
 To: Virginia Giuffre

* We'll get your money going asap. You earned it babe!!! The book next...

See you tomorrow,

Hugs,

S

X0x0

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To: Villafana, Ann Marie C. (USAFLS)[Ann.Marie.C.Villafana@usdoj.gov]
From: Jenna
*Sent: Mon 3/7/2011 9:14:33 PM
Importance: Normal
Subject: RE: Confidential contact information
Received: Mon 3/7/2011 9:14:33 PM

Hi Mrs. Villafana,
I am unable to be contacted by Skype for the next few days as my laptop had a fight with my 3 year old and lost, its in the repair shop now, but I am still contactable by phone. When you are ready, feel free to give me a call anytime.

Sincerely,
Mrs. Virginia Roberts
[REDACTED]

—Original Message—

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, 8 March 2011 4:06 AM
To: Virginia Giuffre
Cc: Bardfeld, Wende E. (FBI)
Subject: FW: Confidential contact information

Dear Virginia:

Please treat this as a confidential communication.

Thank you for contacting me. Special Agent Wende Bardfeld and I would like to speak with you at 9:00 a.m. your time, Tuesday, Mar 8, 2011. According to my calculations, that is 5:00 p.m., Monday, March 7, 2011 here in West Palm Beach.

We would prefer to speak with you via Skype, if possible. We feel that a video-conference would put you a bit more at ease, and would be a better way for us to introduce ourselves to you. Wende has set up a Skype account with user name Wende.Bardfeld@ic.fbi.gov.

If you are unable to sign in to Skype, or if you cannot locate Special Agent Bardfeld's log-in, please send me an email. In the alternative, if we do not hear from you on Skype by 5:10, we will call you on the telephone number that you provided.

Thank you again.

A. Marie Villafana
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
561-209-1047
Fax 561-802-1787

—Original Message—

From: Sharon.Churcher@mailonsunday.co.uk [mailto:Sharon.Churcher@mailonsunday.co.uk]
Sent: Sunday, March 06, 2011 10:06 PM
To: Villafana, Ann Marie C. (USAFLS)
Cc: Virginia Giuffre
Subject: Confidential contact information

Dear Ms. Villafana:

I am sending you this email on a strictly background, not for attribution basis. I will not disclose it nor any future communications between us without your explicit permission.

Virginia Roberts has asked me to give you her cell phone number.

She is in Australia, [REDACTED]

I am copying her in by email but she will be grateful any initial contact with her is by phone. She is 16 hours ahead of EST. A good time for her to speak is nine am her time tomorrow (Monday your time).

Virginia would prefer me to be present when you initiate communication with her. We both realize that any such communication must be in confidence. I will be there for support, not as a journalist.

I am sure you understand that it has been a big step for her coming forward. She has 3 young children and a husband and has concerns about whether she is compromising their well-being.

I am a former investigative reporter for New York Magazine where my colleagues included Nick Pileggi. I understand the sensitivity of this situation.

Frankly, if I still worked there, I would publish everything that I believe happened to Virginia and that now may be happening to a new generation of minors.

But I now run the NY bureau for a UK paper and I am restrained because of the UK's libel laws.

So Virginia and I are putting our trust in you.

Best regards,
Sharon Churcher

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To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
From: Jenna
Sent: Tue 3/15/2011 10:55:12 PM
Importance: Normal
Subject: RE: Here is contact info for NY literary agency u might like
Received: Tue 3/15/2011 10:55:12 PM

Thanks so much shazza! This sounds so amazing! What a good team we make, see you in Sydney!
Xoxo
Jenna

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

From: Sharon.Churcher@mailonsunday.co.uk
Sent: Tuesday, 15 March 2011 8:00 PM
To: Virginia Giuffre; Sandra White
Subject: Here is contact info for NY literary agency u might like

They are called Objective Entertainment. Top guy is Jarred. I think he will be intrigued because you could spin off a TV miniseries Jenna
Will be happy to introduce u.

I also am attaching info on a more traditional agent I know, Irene Goodman. She has had several successes with new authors. Maybe talk to both of them as well as Sandra's agency.

[REDACTED]

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To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
From: Jenna
Sent: Wed 3/16/2011 8:16:47 PM
Importance: Normal
Subject: RE: Your money
Received: Wed 3/16/2011 8:16:47 PM

Hi buddy,
You must be looking forward to getting back home today, I'm just really happy I got to work with you on this! Many more great times to come. Sorry went to bed early last night, we should meet at the newsstand on martin pl and George st. Call me when you get there. Also I don't need Sandra to come this a.m, I've spoken to Jason who sounds nice and she's only a phone call away if I need some support. I'll call her a little later anyways. See ya soon
Jenna

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

From: Sharon.Churcher@mailonsunday.co.uk
Sent: Wednesday, 16 March 2011 7:51 PM
To: Virginia Giuffre
Subject: Your money

Hotel found a 19-29 Martin Place -- US consulate there. If I get a cab to there, will I find the newstand?

Shazza
X0

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To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
From: Jenna
Sent: Thur 3/17/2011 8:11:42 PM
Importance: Normal
Subject: RE:
Received: Thur 3/17/2011 8:11:42 PM

Hi shazza,
You'd still be in the air but hopefully near home by now! We had a wonderful time with you and know this is only a new beginning of a wonderful friendship. Next time bring your hubby and rob can show him a real Aussie BBQ. Yesterday went well, I set some guideline and helped in every way I could, needless to say it took a long time! I would like you to give Brad Edwards my phone number or email so that I may speak with him regarding the victims suit and start that off. You have been so amazingly informative, thank you for everything! Lets speak when your back and relaxed. Take care buddy!
Xoxo
Jenna

-----Original Message-----
From: Sharon.Churcher@mailonsunday.co.uk
Sent: Thursday, 17 March 2011 12:23 PM
To: Virginia Giuffre

Darling Jenna and Rob,

Thank you so much for breakfast...and for finally getting me into downtown Sydney. It makes NY look a bit shabby! I loved the old buildings. And did you see the little black dresses in the Chanel window display near Martin Place??

Seriously, I am so blessed to have you as friends. It is a wrench leaving you --despite everything Jenna has been through, there is a sphere of peace around you and your family and going back into the brash world of New York isn't going to be easy.

I do hope today is going well and that Jeffrey gets the vibes of what's coming to him and his evil empire.

I leave at 3.25pm and get in around 11pm NY time on Thursday.

Sandra is around if you need her. And I will look forward to catching up Friday.

With a very, very big hug,
Shazza
X0x0

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To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
From: Jenna
Sent: Sat 3/19/2011 11:45:51 PM
Importance: Normal
Subject: RE:
Received: Sat 3/19/2011 11:45:51 PM

Hi shazza,

I just got off the phone with Jason and he confirmed that he does infact have your flight logs and journal. I told him you must remain a confidential source and the way he explained it was that all of the info you pass through me will not be used in court, only as a lead for investigation, but he cannot use you as a direct source. He would like your help with the contact information for the following people: Teala Davis, miles and Kathy, Emmy taylor, and Sarah kellan. If there is anyone else you can think of that may be viable, please let me know and I will be happy to pass it on.

Take care buddy,

Jenna

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

From: Sharon.Churcher@mailonsunday.co.uk
Sent: Sunday, 20 March 2011 9:22 AM
To: Virginia Giuffre

Hi there Detective Jenna...

Can you ask Jason to regard me as a confidential source. He may be afraid of media...I can't be seen to be helping him either.

Re his question: I am told the FBI have the flight logs. They also have the journal. It's the document they confiscated from a houseman called Alfredo Rodríguez. Maybe Jason means that he wants to know how they corroborate the flight to London when you were 'given' to Andrew. Here's how: you had photos from that trip -- taken in Granada and London -- and you recalled going to Paris as well and Morocco. I found that itinerary in the logs (you landed at Luton airport near London). Also Johanna had recalled being groped by Andrew one Easter at the NY mansion and that Ghislaine sat both of you on his knee. You had an identical memory and there was a flight to NY just before Easter in 01 that I found in the logs.

Love,
Sharon
X0

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To: Irene Goodman [REDACTED]
From: Virginia Giuffre
Sent: Fri 3/25/2011 8:32:51 PM
Importance: Normal
Subject: Re: Virginia Roberts-Jane Doe 102- Jeffrey Epstein & Prince Andrew Story
Received: Fri 3/25/2011 8:32:51 PM

Hi Irene,

Sorry about the confusion, maybe I misunderstood. So you are a lit agent? I am going to be selling my book soon after Ju maybe we will be in touch then. I hope you are well and thank you for your time.

Regards,
V. Roberts

--- On Thu, 24/3/11, Irene Goodman <irene@irenegoodman.com> wrote:

From: Irene Goodman [REDACTED]
Subject: Re: Virginia Roberts-Jane Doe 102- Jeffrey Epstein & Prince Andrew Story
To: "Virginia Giuffre" [REDACTED]
Received: Thursday, 24 March, 2011, 2:51 PM

Virginia,

I don't publish books--I represent them and sell them to publishers. If you have a proposal, I'd be happy to take a look at it.

Irene

On Wed, Mar 23, 2011 at 7:53 PM, Virginia Giuffre <[REDACTED]> wrote:

Hello Irene,

You came highly recommended from my good pal Sharon Churcher, a journalist who works for Sunday Mail. She mentioned to me that you publish books back in N.Y and thought it would be a great idea to contact you talk about "The Billionaires Playboy Club" a book that I am currently writing, including names of the rich, famous and always in trouble. If you are interested in speaking further about this I would love to chat with you sometime. I am still under a contract until May 20th, so it could only be off the record for now.

Please keep this email strictly confidential

Sincerely,
Virginia Roberts

Irene Goodman Literary Agency
27 West 24th St. Suite 700B
New York, NY 10010
(212) 604-0330

To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
From: Jenna
Sent: Sat 3/26/2011 12:52:38 AM
Importance: Normal
Subject: RE: Solo query from Virginia Giuffre
Received: Sat 3/26/2011 12:52:38 AM

Hi shazza,
How's it going in snowy n.y? I am using your gift the thesaurus, thanks again buddy its really come in handy! I am doing some writing and its real good stuff, putting alot of heartfelt memoirs down for the first time. Hopefully meeting Sandra today and I can really get started! I sent an email to Irene and jarred to let them know I will be interested in using them after my contract is up and jarred asked me to call him but gave me no number. Crazy, huh? Anyways I would love to catch up over the phone when you get a sec. Take care buddy!
Jenna

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

From: Sharon.Churcher@mailonsunday.co.uk
Sent: Thursday, 24 March 2011 12:23 AM
To: Virginia Giuffre
Subject: Fw: Solo query from Virginia Giuffre

Hi Jenna
Let me know if you hear from this guy.
S
X0

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

From: John Wellington
Sent: 23/03/2011 13:11 GMT
To: Sharon Churcher
Subject: Re: Solo query from Virginia Giuffre
I have asked Paolo Silva in Solo to contact Virginia.

John

(Embedded image moved to file: pic06618.jpg)

From John Wellington
Managing Editor
The Mail on Sunday
2 Derry Street
London W8 5TS

Telephone: (+44) 20 7938 7012
Fax: (+44) 20 7795 6696.

To
[REDACTED]
cc
Sharon Churcher/Feat/TMO
S/ANL "Virginia Giuffre"
[REDACTED]
Subject
Solo query from Virginia Giuffre
22/03/11 22:49

Hi John

Virginia has not received an accounting. Can you ask Solo please?
(Virginia's email is above)

Sharon

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To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Sun 3/27/2011 5:15:33 AM
Importance: Normal
Subject: RE: Solo query from Virginia Giuffre
Received: Sun 3/27/2011 5:15:33 AM

Hi Shazza,,

Just got the house sprayed so were saying "bye-bye" to all the redbacks and other vermon..lol!!

I had a meeting with Sandra and it went really well, thanks for the connection!! The book is going really well, everytime I rewrite it, my memories only reflect more and more!!!

I will try and contact Jarred on the number you gave me, thanks for that, and let him know that I am interested in speaking with him but he's gonna have to wait... with the rest of them...he he... until my contract finishes.

I haven't heard anything back yet from the people regarding syndicates, maybe there's just too many :))!! well let me know when you have an idea when you hear something, thank-you buddy.

Take Cares,
Jenna

--- On Sat, 26/3/11, Sharon.Churcher@mailonsunday.co.uk <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon.Churcher@mailonsunday.co.uk <Sharon.Churcher@mailonsunday.co.uk>
Subject: RE: Solo query from Virginia Giuffre
To: "Jenna" <[REDACTED]>
Received: Saturday, 26 March, 2011, 1:15 AM

Hey that's great. You are a real writer.....I think I told you the only incentives that get me going are deadlines and/or cash! Just remember to put me in the acknowledgments!!!! Jarred is moving offices. His number is [REDACTED] or was [REDACTED].

Did you hear from Solo, the syndication agency?

And how are the redbacks and roos treating y'all?

S
xo

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*,
-To: [REDACTED]
From: Jenna
* Sent: Tue 4/5/2011 11:08:09 PM
Importance: Normal
Subject: RE: Virginia Roberts- Jane Doe 102- Jeffrey Epstein and Prince Andrew Story
Received: Tue 4/5/2011 11:08:09 PM

Hi Jarred,

I have no idea how you could've been on hold, I didn't get any messages or missed calls are you sure you dialled the right number, if so I am really sorry. I will call you today, my apologies again.

Regards,
Jenna

From: Jarred Weisfeld
Sent: Wednesday, 6 April 2011 2:21 AM
To: 'Virginia Giuffre'
Subject: RE: Virginia Roberts- Jane Doe 102- Jeffrey Epstein and Prince Andrew Story

I called and was on hold for like 30 mins and had to go

Thanks,
Jarred Weisfeld
Objective Entertainment
[REDACTED]

Please note our new address as of April 15th, 2010
609 Greenwich St. 6th floor
New York, New York 10014

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From: Virginia Giuffre [REDACTED]
Sent: Monday, April 04, 2011 8:24 PM
To: Jarred Weisfeld
Subject: RE: Virginia Roberts- Jane Doe 102- Jeffrey Epstein and Prince Andrew Story

Hi Jarred,

I tried to give you a call today and left a message for you. Is there a good time I should try to call you or alternatively you can call me on my mobile.

MOB: [REDACTED]

Warmest Regards,
Jenna

--- On Tue, 29/3/11, Jarred Weisfeld [REDACTED] wrote:

From: Jarred Weisfeld [REDACTED]
Subject: RE: Virginia Roberts- Jane Doe 102- Jeffrey Epstein and Prince Andrew Story
To: "'Virginia Giuffre'" [REDACTED]
Received: Tuesday, 29 March, 2011, 3:15 PM

[REDACTED]

Thanks,

- Jarred Weistfeld
- Objective Entertainment

Please note our new address as of April 15th, 2010

609 Greenwich St. 6th floor

New York, New York 10014

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From: Virginia Giuffre [REDACTED]
Sent: Wednesday, March 23, 2011 7:47 PM
To: [REDACTED]
Subject: Virginia Roberts- Jane Doe 102- Jeffrey Epstein and Prince Andrew Story

G'day Jarred,

You came highly recommended from my good pal Sharon Churcher, a journalist who works for Sunday Mail. She mentioned to me that you produce miniseries back in N.Y and thought it would be a great idea to contact you to talk about "The Billionaires Playboy Club" a book that I am currently writing, including names of the rich, famous and always in trouble. If you are interested in speaking further about this I would love to chat with you sometime. I am still under a contract until May 20th, so it could only be off the record for now.

Please keep this email strictly confidential.. Thanks Mate!!

Sincerely,

Virginia Roberts

To: Jarred Weisfeld [REDACTED]
From: Virginia Giuffre
Sent: Wed 4/6/2011 11:02:49 PM
Importance: Normal
Subject: RE: Virginia Roberts- Jane Doe 102- Jeffrey Epstein and Prince Andrew Story
Received: Wed 4/6/2011 11:02:50 PM
[J.E Article.webarchive](#)
[J.E Jailtime.webarchive](#)
[Local News West Palm Beach, Palm Beach County, Martin & St. Lucie Counties The Palm Beach Post.webarchive](#)
[Prince Andrew may be quizzed as FBI reopen Jeffrey Epstein sex case Mail Online.webarchive](#)

Hi Jarred,

Really sorry again about the other day, I questioned my husband and father-in-law and nobody knew anything, and it's really weird because nobody calls me Virginia at home, so anyways it's a mystery unsolved. lol

Here are some of the articles pertaining to the J.E case and i.e "The Story" as requested.

I look forward to speaking with you again shortly!!!

Take Care,
Jenna

— On Tue, 5/4/11, Jarred Weisfeld [REDACTED] wrote:

From: Jarred Weisfeld [REDACTED]
Subject: RE: Virginia Roberts- Jane Doe 102- Jeffrey Epstein and Prince Andrew Story
To: "Virginia Giuffre" [REDACTED]
Received: Tuesday, 5 April, 2011, 4:21 PM

I called and was on hold for like 30 mins and had to go

Thanks,
Jarred Weisfeld
Objective Entertainment
[REDACTED]

Please note our new address as of April 15th, 2010
609 Greenwich St. 6th floor
New York, New York 10014

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Sent: Monday, April 04, 2011 8:24 PM
To: Jarred Weisfeld
Subject: RE: Virginia Roberts- Jane Doe 102- Jeffrey Epstein and Prince Andrew Story

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MOB: [REDACTED]

Warmest Regards,
Jenna

--- On Tue, 29/3/11, Jarred Weisfeld [REDACTED] wrote:

From: [REDACTED]
Subject: RE: Virginia Roberts- Jane Doe 102- Jeffrey Epstein and Prince Andrew Story
To: "Virginia Giuffre" [REDACTED]
Received: Tuesday, 29 March, 2011, 3:15 PM

212-431-5454

Thanks,

Jarred Weisfeld

Objective Entertainment

Please note our new address as of April 15th, 2010

609 Greenwich St. 6th floor

New York, New York 10014

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From: Virginia Giuffre [REDACTED]
Sent: Wednesday, March 23, 2011 7:47 PM
To: [REDACTED]
Subject: Virginia Roberts- Jane Doe 102- Jeffrey Epstein and Prince Andrew Story

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Please keep this email strictly confidential.. Thanks Mate!!

Sincerely,

Virginia Roberts

To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Mon 5/2/2011 11:28:30 PM
Importance: Normal
Subject: Re:
Received: Mon 5/2/2011 11:28:30 PM

Hi Buddy,

So much has been happening lately, I haven't even had the chance to catch up with you, my apologies!!! I have been working really hard on "The Story" and loving it! Only 17 days until the contract is finished with Mail On Sunday and I am so excited I will soon be selling my book to a publisher and who knows from there...YEAH!!!!

I was sent a message by Brad Edwards who suggested that maybe it could be a good idea to speak with the gentleman from Vanity Fair when my contract is finished as it is a great way to gain publicity for my book and the case, as long as I can ensure that the writer brings the story out in a classy way and does not spill the beans on the major parts of the story. I am considering it as long as my needs and conditions are met. Do you have any major concerns that could see this potentially hindering anything? If so please let me know as I do trust in you as my wonderful confidante.

Sandra is still in England covering the wedding, hopefully she'll be back soon to start some serious work with me. I have received her version of the raw synopsis and so far so good. I look forward to seeing the finale!!

Much Love xoxoxo
Jenna

--- On Mon, 2/5/11, Sharon.Churcher@mailonsunday.co.uk <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon.Churcher@mailonsunday.co.uk <Sharon.Churcher@mailonsunday.co.uk>
Subject:
To: "Virginia Giuffre" [REDACTED]
Received: Monday, 2 May, 2011, 3:34 PM

Hi sweetheart

How is the book going?

I thought I should catch up with you because Vanity Fair are doing an Andrew piece and Brad says their writer, Ed Klein, wants to interview you.

My strong instinct is not to help him -- not to even take his calls -- as there is no upside in giving away one of THE selling points of the book. (This crazy wedding hoopla should be great timing in terms of getting publishers interested..).

See you in June!

Love,
Shaza
X0x0

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EXHIBIT

23

Giuffre

AGREN BLANDO REPORTING

5/3/14

KAM

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To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Tue 5/3/2011 1:01:39 AM
 Importance: Normal
 Subject: Re: Re: Do you recognize this girl?
 Received: Tue 5/3/2011 1:01:39 AM

My God that sounds just like your cup of tea...NOT!! You poor thing, at least it can't be as bad as the customer service at the Crown Plaza..he..he..he!! Have fun buddy
 Take Care,
 Jenna

--- On Tue, 3/5/11, Sharon.Churcher@mailonsunday.co.uk <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon.Churcher@mailonsunday.co.uk <Sharon.Churcher@mailonsunday.co.uk>
 Subject: Re: Re: Do you recognize this girl?
 To: "Virginia Giuffre" [REDACTED]
 Received: Tuesday, 3 May, 2011, 12:54 AM

Excellently said, Jenna. Now let's just hope he does a GREAT pr job.

I am off to the UK tonight -- to see my mom and for a company "war zone" training course. Idea of the latter is that ex Special Forces guys teach us what to do if we are shot at or kidnapped....dumbest thing I ever heard of unless they plan to arm us with machine guns.

I will be on my usual email and cell phone. Get back to NY on May 17th.
 Hugs to you all,
 Shazza
 Xcxc

|----->
 |From: |
 |----->
 >-----|
 |Virginia Giuffre [REDACTED] |
 >-----|
 |----->
 |To: |
 |----->
 >-----|
 |Sharon Churcher |
 >-----|
 |----->
 |Date: |
 |----->
 >-----|
 |03/05/2011 01:42 GDT |
 >-----|
 |----->
 |Subject: |
 |----->
 >-----|
 |Fw: Re: Do you recognize this girl? |
 >-----|

GIUFFRE004870
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Shazza,

I LOVE YOUR WORK!!!! Read below this is what I also just sent him, I can't thank my lucky stars enough to count you as one of my friends...my deepest appreciation for your concern!!!

Warmest Regards,Jenna

--- On Tue, 3/5/11, Virginia Giuffre [REDACTED] wrote:

From: Virginia Giuffre [REDACTED]

Subject: Re: Do you recognize this girl?

To: "Brad Edwards" <brad@pathtojustice.com>

Received: Tuesday, 3 May, 2011, 12:36 AM

Hi Brad,

I am so sorry to hear the news of Ruslana, and my condolences are with her family and friends. I can say that I have never had any meetings with her, sorry not to be of any help there.

With the Vanity Fair piece, I spoke to Sharon Churcher who had some great pointers about why I shouldn't give him an exclusive about the case. First of all "The Story" is full of names of people involved in my years spent with J.E and I wouldn't want to spoil the details in my book. Secondly If J.E finds out that I am doing a book he may try to stop me from publishing it,

Im sure he has his ways through his many various contacts, and thirdly I want to have this book on the shelves for the audience to go buy the second that my publicity starts. In saying that I still believe it is great publicity for our case and probably a good idea for you to speak with him about the case instead of me. If written the right way and brought out as you having a key witness now speaking with authorities or what not, they could even use a simple picture of me to spice it up. I just don't want my last name "Giuffre" mentioned or the fact that there is a book in the makings. What do you think about all of this? It will be very helpful to hear your opinion tomorrow when we speak.

I hope you have been doing well and staying busy fighting one scandal at a time!!

Best Regards,Jenna --- On Mon, 2/5/11, Brad Edwards

<brad@pathtojustice.com>

wrote:

From: Brad Edwards <brad@pathtojustice.com>

Subject: Do you recognize this girl?

To: "Virginia Giuffre" [REDACTED]

Received: Monday, 2 May, 2011, 2:09 PM

I think it is a long shot that you would recognize her, but read the article I attached and then look at the pictures and see if you recognize her. I will call you tomorrow.

<http://www.newsweek.com/2011/05/01/the-lost-girl.html> Ruslana Korshunova

<http://www.bittenandbound.com/2008/06/29/model-ruslana-korshunova-dies-after-nine-story-fall/>

Brad Edwards Civil Justice Attorney Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.L.C. 425 North Andrews Avenue, Suite 202 Fort

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Lauderdale, Florida 33301 Telephone: 954-524-2820 Facsimile:
954-524-2822 Toll-free:

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To: sharon.churcher[sharon.churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Wed 5/4/2011 4:46:50 AM
 Importance: Normal
 Subject: Fw: RE: Virginia Roberts- How's the wedding?
 Received: Wed 5/4/2011 4:46:50 AM

Hi Shazza,

I just got this message in from Sandra and was wondering what you think about her increase in percentages. I'm not sure what to respond, when you get this message do you mind giving me a holler, **as I would appreciate your advice.**

As Always Appreciative,
 Jenna

— On Tue, 3/5/11, Sandra White [REDACTED] wrote:

From: Sandra White [REDACTED]
 Subject: RE: Virginia Roberts- How's the wedding?
 To: [REDACTED]
 Received: Tuesday, 3 May, 2011, 4:18 PM

Hi Jenna

Good to hear from you - so nice to get an email that wasn't connected to work! I have been doing seven days a week on this wedding and I even wrote five pages yesterday!

However, that will probably be the last of the heavy workload I should think.

As far as the mid June deadline goes, nothing is impossible but you don't want to sell yourself short. All you need for any meetings with agents is a strong proposal (which ours is, though not complete) and a sample chapter or two.

But, as you mentioned before, we need to get things on a more formal footing between us before we progress much further.

I have been in touch with agents here to confirm what I thought and ghost writers' percentages vary from 50-50. Seeing as though you are doing a lot of the initial work yourself, I thought it would be fairer if we worked on a 7-30 split, in your favour.

Let me know what you think, then we can get an agreement written up between us and move on. bring it on!

Hope you are feeling well and that Robbie and the kids are well.

Yours
 Sandra

Date: Mon, 2 May 2011 17:59:05 -0700
 From: [REDACTED]
 Subject: Virginia Roberts- How's the wedding?
 To: [REDACTED]

Hi Sandra,

I am glad for you the big wedding is now over, and we can start looking at getting this book up and running. I have had some big named mag's trying to contact me for some pieces on "the story" and some one else from an editing agency wanting to do a story themselves, so need to get busy. I have done a lot of work and when you are ready, I'd love for us to coincide our writing. Mid-June is when I am going to in the States, and would be my deadline to have this book nearly finished, if not completed. Do you see this as a possibility? I am looking forward to speaking with you soon, and only 17 more days until my contract is up with Mail On Sunday...Yeah!! Take Care Buddy.

Warmest regards,
 Jenna

To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Fri 5/6/2011 1:20:10 AM
 Importance: Normal
 Subject: Re:
 Received: Fri 5/6/2011 1:20:10 AM

Hi again buddy,

I thank you for looking into the percentages of Ghostwriters. I honestly don't know what to do regarding her offer. What do you think about her status compared to another Ghostwriter that charges the same rate? I just want to know she's worth in the end. She said she conferred with her agents in London and they supposedly said it's normally 50% cut between both writers but because I'm doing most of the work she will generously give me 70% and she'll take 30%. I guess the advantage of hiring her is that she is local and can help get INT'L coverage, but should I be waiting to sign with an agent before her and I agree to anything? I haven't responded back to her yet hoping you could advise me on the best route to take her. I know you have a wealth of experience in this field and I completely trust in your guidance.

How is it on the front line? I hope your having a good vacation/training and enjoying time with your Mother. Take care of yourself and I look forward to hearing from you soon.

Warmest Regards,
Jenna

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From: Sharon.Churcher@mailonsunday.co.uk <Sharon.Churcher@mailonsunday.co.uk>
 Subject:
 To: "Virginia Giuffre" [REDACTED]
 Received: Wednesday, 4 May, 2011, 9:18 PM

Hi Jenna

Thirty percent is the going rate, at least for top ghost writers. I checked with my friend.
 Having said which, my advice would be to negotiate since you are doing so much of the work. I would offer 30 percent of your "net" advance

(the advance is an upfront fee from the publisher...

The net advance is the money you receive after the agent takes his or her percentage which is usually 10 to 15pc.)

S
X0

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* To: sharon churchier[sharon.churchier@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Tue 5/10/2011 10:00:56 PM
Importance: Normal
Subject: Good News!!
Received: Tue 5/10/2011 10:00:56 PM

Hi Sharon,

Hello gorgeous, I hope this message comes to you on a bright, sunny day!!! I took your advice about what to offer Sandra and she accepted. Were drawing up a contract through her agent right now and getting busy to meet my deadline. Just wondering if you have any information on you from when you and I were doing interviews about the J.E story. I wanted to put the names of some of these assholes, cops, I meant to say, pedo's, that J.E sent me to. With everything going on my brain feels like mush and it would be a great deal of help!

Having fun sweetie?

Thanks,
Jenna

To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Thur 5/12/2011 2:21:43 AM
 Importance: Normal
 Subject: Re: Good News!!
 Received: Thur 5/12/2011 2:21:43 AM

Thanks again Shazza, I'm bringing down the house with this book!!!
 xoxo Jenna

--- On Wed, 11/5/11, Sharon.Churcher@mailonsunday.co.uk <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon.Churcher@mailonsunday.co.uk <Sharon.Churcher@mailonsunday.co.uk>
 Subject: Re: Good News!!
 To: "Virginia Giuffre" [REDACTED]
 Received: Wednesday, 11 May, 2011, 4:17 PM

Don't forget Alan Dershowitz...JE's buddy and lawyer..good name for your
 pitch as he repped Claus von Bulow and a movie was made about that
 case...title was Reversal of Fortune. We all suspect Alan is a pedo and tho
 no proof of that, you probably met him when he was hanging out w JE

|----->
 |From: |
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 >-----|
 |Virginia Giuffre [REDACTED] |
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 |----->
 |To: |
 |----->
 >-----|
 |Sharon Churcher |
 >-----|
 |----->
 |Date: |
 |----->
 >-----|
 |10/05/2011 23:00 GDT |
 >-----|
 |----->
 |Subject: |
 |----->
 >-----|
 |Good News!! |
 >-----|

|-----|
 |Hi Sharon, |
 |
 |Hello gorgeous, I hope this message comes to you on a bright, sunny day!!!
 |I took your advice about what to offer Sandra and she accepted. Were
 |drawing up a contract through her agent right now and getting busy to meet

my deadline. Just wondering if you have any information on you from when
you and I were doing interviews about the J.E. story. I wanted to put the
names of some of these assholes, oops, I meant to say, pedo's, that J.E.
sent me to. With everything going on my brain feels like mush and it would
be a great deal of help!
Having fun sweetie?

Thanks,
Jenna

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To: sharon.churcher[sharon.churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Fri 5/13/2011 10:03:54 PM
Importance: Normal
Subject: Fw: Re: Solo Syndication
Received: Fri 5/13/2011 10:03:54 PM

Hi Shazza,

We are starting to freeze out here in Australia as winter closes in fast...burr!!

How are things for you? Are you still out in the U.K or back in N.Y.C?

I was hoping I could confide in your advice again. Paulo sent me the below messages regarding the syndicates and from the last time him and I emailed and I have actually lost \$300- If you look at the long list of big named companies that would mean my story/picture was only sold for \$600 each. I am only looking out for my best interests and know you would do the same. I haven't told anyone that I am asking you this, not wanting to rock the boat, I just know your experience in the field far exceeds mine and would love your input! I hope all is well for you and your own and taking care, as always!!

xoxo Jenna

--- On Fri, 13/5/11, Paulo Silva <psilva@solosyndication.com> wrote:

From: Paulo Silva [REDACTED]
Subject: Re: Solo Syndication
To: "Virginia Giuffre" [REDACTED]
Received: Friday, 13 May, 2011, 12:49 PM

Hi Virginia,
I have now spoken to our accounts. This is how it stands:

Total amount owed to you - £ 4,175
Amount ready to be paid to you - £ 1,825
Amount still to be received - £ 2,350

Obviously we are still chasing the outstanding amount. I know you requested that the whole payment be made to you when ready, but if you wish I am happy to arrange for the initial amount to be paid, and the remaining amount to be paid once received from our clients? Let me know your thoughts.

Regards,
Paulo Silva
Senior Sales Executive, Photos
Solo Syndication
Tel: +44 (0)207 566 0364
[REDACTED]

From: Virginia Giuffre [REDACTED]
Date: Thu, 12 May 2011 22:52:13 -0700 (PDT)
To: Paulo Silva [REDACTED]
Subject: Re: Solo Syndication

Hi Paulo,
Were only a week off from my contract finishing with the Mail On Sunday and I was wondering if you have received the full amount owed f the syndicates. I thought it'd be a good idea to check in and see how it was all tying up. I hope you and yours are well, and taking care.

Sincerely,
Virginia Roberts

--- On Fri, 1/4/11, Paulo Silva [REDACTED] wrote:

• To: sharon.churcher[sharon.churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Fri 5/20/2011 2:20:09 AM
 Importance: Normal
 • Subject: How ya doing??
 Received: Fri 5/20/2011 2:20:09 AM

Hi Buddy,

I hope you are stopping to smell the daffodils once in a while and having a good day!! I am so excited today because I can go sign with an agent as my contract is finished with "Mail On Sunday"...YEAH!! Sandra and I have been working really hard to get me ready for my trip to the U.S in a few weeks and I was wondering if I could use your advice again. She has got an INT'L agent who is interested in speaking with me and I don't want to say "Yes" to the first bite because I'm not sure what to look for in an agent. What could you recommend that I do? I will send Jarred and Irene (your recommended agent) a copy of the synopsis and sample chapters but how do I choose the right one for "The Story"? Do you know anyone else that might be interested in this as well? If so, I am keen on speaking with anyone who might be. I am soooooo excited about this and will keep you updated with the progressing events. When I am in New York we have to meet up for some city shopping and take the kids to Central Park to see the Zoo, given there will be no masturbating kangaroo's for you to make friends with, but who knows? I am looking forward to showing Robbie around and he's got some family out there as well we have to catch up with. Such busy times, but I'm loving it!! Anyways I hope your taking care and catch me up on your fun times!!

Take care,
 Jenna

• To: sharon churchier[sharon.churchier@mailonsunday.co.uk]
• From: Virginia Giuffre
Sent: Sat 5/21/2011 8:42:10 PM
Importance: Normal
• Subject: What do you think of this?
Received: Sat 5/21/2011 8:42:10 PM

Hi Sharon,

Sandra and I are just about to start sending prologues out when she finally got back to me with a contract. After our last discussion to take 30% off the net advance for her being the ghostwriter, and no electronic rights, she has now sent me the advance, royalties, serialisation rights, book club rights, film rights and TV rights will be split between them 70 – 30, Virginia Giuffre's favour, after any agent's commission.

She has got all of the info to write a story by herself if she wanted too, can she legally?

Please give me a call or let me know a good time to reach you, I don't know how to respond back to this when we are so close to the end.

Much Thanks,
Jenna

To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Mon 5/23/2011 10:20:27 PM
 Importance: Normal
 Subject: Re: What do you think of this?
 Received: Mon 5/23/2011 10:20:27 PM

Hi Shazza,

I replied back to Sandra, in a very nice but business like way, and have not heard from her since, insinuating that she might be offended that I am not paying her what she wants. I need to start looking at alternative ghostwriters and was hoping you could point me in the right direction and what their financial interests are. Once again you always come through, Thanks Matey!!

xoxox
 Jenna

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From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
 Subject: Re: What do you think of this?
 To: [REDACTED]
 Received: Saturday, 21 May, 2011, 8:47 PM

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From: Virginia Giuffre [REDACTED]
Sent: Monday, May 23, 2011 11:20 PM
To: Sharon Churcher
Subject: Re: What do you think of this?

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GIUFFRE003973

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To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Tue 5/24/2011 11:07:04 PM
Importance: Normal
Subject: Re: Book!
Received: Tue 5/24/2011 11:07:04 PM

I thank my mucky stars to have a good friend like you!!...Jenna

--- On Tue, 24/5/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject: Book!
To: "Sandra White" [REDACTED]
Cc: "Virginia Giuffre" [REDACTED]
Received: Tuesday, 24 May, 2011, 10:48 PM

Hi Sandra

How's it all going?

Virginia just emailed me asking suggestions about agents. I assume you guys plan to share one as that will keep the commission and collaborations agreement costs down? She also wasn't sure about the norm with splits on electronic rights....I think the agent can advise you both on the latest industry norms as it all has changed so much with the Internet.

A pal of mine (David Heymann) has said to use his name with his agent, Mel Berger, who is the top guy at William Morris in NY.

Is that OK with you? I know you have your own rep so thought I should check.

Love,

Sharon

PS We are out of contract with Virginia but are hoping to buy first serial to the book of course...did she tell you Vanity Fair are trying to find her? We aren't helping them and have refused to tell them her married name...I am not going to give it to Mel as he tends to be a bit of a gossip and knows the VF crowd.

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Registered No 84121 England.

To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Tue 5/24/2011 10:15:28 PM
 Importance: Normal
 Subject: Re: What do you think of this?
 Received: Tue 5/24/2011 10:15:28 PM

Hi Shazza,

This is her final reply, I am not very hopeful about using her anymore.

Do you know of any other reputable Ghostwriters in N.Y.C, I just don't think she is going to be in my best interests. See below email from her this a.m...

Thanks Buddy!!

Hi Jenna

I am not offended by your comments and I agree with you that this is business but I must say I don't know where you are getting your information from. All the research I have done here tells me that ghost writer's are usually working on a 50-50 basis. That is the figure quoted in the 2011 edition of the Writers and Artists Year Book. I have never worked on less than 40% but because you were doing a lot of the initial writing I thought it would be much fairer if my percentage reflected that, that's why I went down to 30%

I do not know of any ghost writer who relinquished screen rights and serialisation rights. The main reason for that is, obviously, it is the ghost writer's writing and input that has been sold on for screen or serialisation.

If you want to find someone else, that is entirely up to you, but those are my terms.

As for Grant, there is no need to get him to sign a confidentiality agreement because there is no need for him to see the manuscript. He only needs to know who you are and that has been in the paper!

As for sending out to agents, I was going to advise you nearer the time, but I'll do it now. In my opinion your first step should be to make appointments to see the people in New York when you go there, taking with you the proposal and first chapter. They know what the story is and they have expressed an interest. You have got your foot in the door to sell yourself and your book. If you send it to them beforehand you are giving them the opportunity to say no without having met you. And you have a lot going for you personality and intelligence wise so we want them to see that!

If those meetings don't produce anything, then we send it to other agents.

I'll get Grant to call you but I have left your phone number at home, so email it to me and I'll pass it on.

Hope all is well.

Sandra

— On Tue, 24/5/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>

Subject: Re: What do you think of this?

To: [REDACTED]

Received: Tuesday, 24 May, 2011, 11:57 AM

There are 2 top agents who rep writers I know. Let me see what I can do. Did you check on "Grant"?

From: Virginia Giuffre [REDACTED]

Sent: Tuesday, May 24, 2011 03:12 AM

To: Sharon Churcher

Subject: Re: What do you think of this?

Hi Shazza,

She did send back a message after I asked if we were still on, but very blunt and to the point. She said she has been very busy and that it. I don't know what that means but I am meeting with an entertainment lawyer on Friday who is going to write me up an official collaboration agreement in hopes to get the ball rolling. I do think I should have a backup plan and appreciate all of your assistance!! I am compiling a list of reputable agents, is there anyone else you can think of besides Jared and Irene? Hope you are all well and your Mother is improving. Take care my friend..

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Jenna

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From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>

Subject: Re: What do you think of this?

To: [REDACTED]

Received: Tuesday, 24 May, 2011, 12:42 AM

I would phone Sandra and suggest meeting to talk about agents (including Grant, about whom you have every reason to ask questions). At this stage you have enough to sell the book...and she needs you so I think will be reasonable.

S

X0x0

To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Tue 5/24/2011 2:12:09 AM
 Importance: Normal
 Subject: Re: What do you think of this?
 Received: Tue 5/24/2011 2:12:09 AM

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 Subject: Re: What do you think of this?
 To: [REDACTED]
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To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Tue 5/24/2011 9:49:22 PM
 Importance: Normal
 Subject: Re: What do you think of this?
 Received: Tue 5/24/2011 9:49:22 PM

Hi Shazza,

I appreciate your assistance, and look forward to any help that you can offer. I haven't heard back from her yet with any details re Grant. I will send you a message when I know more too!! Much Love...

Jenna

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To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Tue 5/24/2011 10:15:28 PM
 Importance: Normal
 Subject: Re: What do you think of this?
 Received: Tue 5/24/2011 10:15:28 PM

Hi Shazza,

This is her final reply, I am not very hopeful about using her anymore.

Do you know of any other reputable Ghostwriters in N.Y.C, I just don't think she is going to be in my best interests. See below email from her this a.m...

Thanks Buddy!!

Hi Jenna

I am not offended by your comments and I agree with you that this is business but I must say I don't know where you are getting your information from. All the research I have done here tells me that ghost writer's are usually working on a 50-50 basis. That is the figure quoted in the 2011 edition of the Writers and Artists Year Book. I have never worked on less than 40% but because you were doing a lot of the initial writing I thought it would be much fairer if my percentage reflected that, that's why I went down to 30%

I do not know of any ghost writer who relinquished screen rights and serialisation rights. The main reason for that is, obviously, it is the ghost writer's writing and input that has been sold on for screen or serialisation.

If you want to find someone else, that is entirely up to you, but those are my terms.

As for Grant, there is no need to get him to sign a confidentiality agreement because there is no need for him to see the manuscript. He only needs to know who you are and that has been in the paper!

As for sending out to agents, I was going to advise you nearer the time, but I'll do it now. In my opinion your first step should be to make appointments to see the people in New York when you go there, taking with you the proposal and first chapter. They know what the story is and they have expressed an interest. You have got your foot in the door to sell yourself and your book. If you send it to them beforehand you are giving them the opportunity to say no without having met you. And you have a lot going for you personality and intelligence wise so we want them to see that!

If those meetings don't produce anything, then we send it to other agents.

I'll get Grant to call you but I have left your phone number at home, so email it to me and I'll pass it on.

Hope all is well.

Sandra

— On Tue, 24/5/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
 Subject: Re: What do you think of this?
 To: [REDACTED]
 Received: Tuesday, 24 May, 2011, 11:57 AM

There are 2 top agents who rep writers I know. Let me see what I can do. Did y check on "Grant"?

From: Virginia Giuffre [REDACTED]
 Sent: Tuesday, May 24, 2011 03:12 AM
 To: Sharon Churcher
 Subject: Re: What do you think of this?

Hi Shazza,

She did send back a message after I asked if we were still on, but very blunt and to the point. She said she has been very busy and that was it. I don't know what that means but I am meeting with an entertainment lawyer on Friday who is going to write me up an official collaboration agreement in hopes to get the ball rolling. I do think I should have a backup plan and appreciate all of your assistance!! I am compiling list of reputable agents, is there anyone else you can think of besides Jared and Irene? Hope you are all well and your Mother is improving. Take care my friend..

xoxox
 Jenna

— On Tue, 24/5/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
 Subject: Re: What do you think of this?
 To: [REDACTED]
 Received: Tuesday, 24 May, 2011, 12:42 AM

I would phone Sandra and suggest meeting to talk about agents (including Grant, about whom you have every reason to ask questions). At this stage you have enough to sell the book...and she needs you so I think will be reasonable.

S
 X0x0

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GIUFFRE003972

To: sharon churcher[sharonchurcher@hotmail.com]
From: Virginia Giuffre
Sent: Sun 5/24/2015 1:40:53 AM
Importance: Normal
Subject: Re: RE:
Received: Sun 5/24/2015 1:40:53 AM

Hi there,

Yeah lots of good things happening, right now just have to stay tight lipped but I hope you're doing well and take care!!

xoxo Jenna

Sent from my iPhone

On May 23, 2015, at 3:07 PM, sharon churcher <sharonchurcher@hotmail.com> wrote:

Just was reading about David Boies taking your case. How fantastic, Jenna! Have you asked him how he'd feel about you reviving your book? It would be an incredible shame if the other project lifts your story, which it could at least somewhat. Jarred still is very keen to represent you. am afraid I screwed up by steering you to Mimi.

I just had a great week in LA on a celebrity story. Got to go to Rodeo Drive!!!!

Much love,

Shazza xoxo

Sharon Churcher
New York Correspondent
Telephone: +1 (914)-319-1838
Email: sharonchurcher@hotmail.com

From: Virginia Giuffre
Sent: 5/9/2015 1:46 PM
To: sharon churcher
Subject: Re:

Hi Shazza!!

Who is this writer? Don't know anything about it.

Hope all has been well lately!!

Jenna

Sent from my iPhone

On May 9, 2015, at 2:10 PM, sharon churcher <sharonchurcher@hotmail.com> wrote:

Hi there

A NY writer is doing a book on Jeffrey. The writer claims you are on side and if that is so, that is fantastic. But if for any reason you are not on that contract, this would be the time to sell your own book. I believe it will be a bestseller. You write very well.

Love to all,
Shazz

To: Sharon Churcher[sharon.churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Wed 5/25/2011 11:29:40 PM
Importance: Normal
Subject: Hello...
Received: Wed 5/25/2011 11:29:40 PM

Hi again buddy,

Just wondering if Sandra got back to you with a reply to your message. I don't think she's gonna budge on the final cuts, but I'll give it a few days to see what comes of this. I will keep writing, but should I still see the lawyer on Friday to draft a collaboration agreement if no reply from her. How are you settling back in N.Y.C? I hope you are doing well and I look forward to chatting again soon!!

Take Care,
Jenna

To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Thur 5/26/2011 12:15:04 AM
 Importance: Normal
 Subject: Re: Hello...
 Received: Thur 5/26/2011 12:15:04 AM

Hi,

Okay, so my next step is to look for an agent, don't I need to send them a synopsis and sample chapters, or how do I approach one and ask them to represent me? I'm sorry to bombard you with these questions but I take your word upon oth and know that you actually know what your talking about!!

As far as Sandra goes I am not willing to pay her what she wants, could you please give me the names and contact info t any other ghostwriters who might be interested. Are you sure you don't want a piece of this story??? ha, ha.

As always xoxoxo Jenna

-- On Wed, 25/5/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
 Subject: Re: Hello...
 To: [REDACTED]
 Received: Wednesday, 25 May, 2011, 11:37 PM

I think u should call her and say you cannot agree to give her more than 30pc of the book advance at this v early stage of things. If she balks I would say to her that you are going to look for an agent and will have him/her talk to Sandra or her agent about hammering out an agreement with her. I don't think paying a lawyer is worth it unless she goes for the 30pc. If she does he can do up an agreement.

From: Virginia Giuffre [REDACTED]
 Sent: Thursday, May 26, 2011 12:29 AM
 To: Sharon Churcher
 Subject: Hello...

Hi again buddy,

Just wondering if Sandra got back to you with a reply to your message. I don't think she's gonna budge on the final cuts, I'll give it a few days to see what comes of this. I will keep writing, but should I still see the lawyer on Friday to draft a collaboration agreement if no reply from her. How are you settling back in N.Y.C? I hope you are doing well and I look forward to chatting again soon!!

Take Care,
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- it for viruses as we can take no responsibility for any computer virus which may be transferred by way of this e-mail. Use
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To: Sharon Churcher [Sharon.Churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Thur 5/26/2011 9:38:46 PM
 Importance: Normal
 Subject: Re:
 Received: Thur 5/26/2011 9:38:46 PM

Hi Shazza,

Sounds like a good plan but I haven't heard back from Sandra yet re the money I will pay her for synopsis and sample chapters, If I don't hear back from her soon, I will send you what I've got and maybe you can judge whether or not it is ready to go to an agent. I hope you're enjoying Boston and try to not work so hard all the time!!

xoxox

Jenna

--- On Thu, 26/5/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
 Subject: [REDACTED]
 To: [REDACTED]
 Received: Thursday, 26 May, 2011, 5:28 PM

My ghostwriter pal says 30pc of all rights is norm. But also says Sandra doesn't sound right for u...u need someone more reliable. I suggest u first look for an agent and then they hook u up with a tested writer.

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To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Mon 5/30/2011 2:01:32 AM
Importance: Normal
Subject: Re:
Received: Mon 5/30/2011 2:01:32 AM

Hi Shazza,

No news from Sandra yet, not even a reply back. So now my next plan of action is to get an agent and get my book sold by a publisher. Sandra's professional approach towards this matter isn't suffice, I need someone who will take this very serious. In other news I got another message from Brad Edwards who passed on another request from VF, offering to pay me for my pic with P.A. I know they are putting together a piece on P.A and I would like to find out exactly what that entitles about myself. I hope you are enjoying the festivity of the weekend and look forward to your next email.

Take Care,
Jenna

--- On Sat, 28/5/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject:
To: [REDACTED]
Received: Saturday, 28 May, 2011, 8:00 PM

Before you make a final decision on Sandra, I would ask her for titles and publishers of other books she has ghosted and titles of any films. That's a legit request since she wants 30pc of everything. Let's see what experience she has.
S
X0x0

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To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Mon 5/30/2011 10:43:19 PM
 Importance: Normal
 Subject: Re: VF
 Received: Mon 5/30/2011 10:43:19 PM

Hi Shazza,

Good points, all of them. I am looking at both sides to the picture. On the upside it will give exposure to build up publicity for the case and the story but like you said, It must be carefully written and not give any notions about the upcoming book and or any new info. When i was doing some research into VF yesterday, it does concern me what they could want to write about me considering that B.Clinton walked into VF and threatened them not to write sex-trafficking articles about his good friend J.E. Should I be asking what is this story their writing pertaining to? I wouldn't want to give the public a bad image or anything like that. I don't know, it's all such a gamble. I just thank goodness for having a friend like you on the inside who knows how to deal with the viciousness of todays world!! I will let Brad know what you have recommended. Thanks Again!!!!

xoxoxoxo Jenna

--- On Mon, 30/5/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
 Subject: VF
 To: [REDACTED]
 Cc: "brad@pathtojustice.com" <brad@pathtojustice.com>
 Received: Monday, 30 May, 2011, 1:48 PM

I would let VF buy your picture via Brad. The big gamble would be to let him also give them a statement saying your interviews with us were accurately reported and you have no more to say at this time about how you were "sex trafficked to PA and other men including two of the world's most respected politicians ([REDACTED] and [REDACTED] as well as women (the scenes with Ghislaine etc) because you are writing a book. The reason this is a gamble is Jeffrey knows some of the most powerful people in publishing and, once alerted, will inevitably try to scare off potential buyers. But the upside is it should help you get a good agent. I would have Brad use the phrase "sex trafficked" as that is a heads up about the book revealing more than we printed.

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and or any new info. When i was doing some research into VF yesterday, it does concern me what they could want to write about me considering that B.Clinton walked into VF and threatened them not to write sex-trafficking articles about his good friend J.E. Should I be asking what is this story their writing pertaining to? I wouldn't want to give the public a bad image of anything like that. I don't know, it's all such a gamble. I just thank goodness for having a friend like you on the inside who knows how to deal with the viciousness of today's world!! I will let Brad know what you have recommended. Thanks Again!!!!

xoxoxoxo Jenna

--- On Mon, 30/5/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>

Subject: VF

To: [REDACTED]

Cc: "brad@pathjustice.com" <brad@pathjustice.com>

Received: Monday, 30 May, 2011, 1:48 PM

I would let VF buy your picture via Brad. The big gamble would be to let him also give them a statement saying your interviews with us were accurately reported and you have no more to say at this time about how you were "sex trafficked to PA and other men including two of the world's most respected politicians [REDACTED] and [REDACTED] as well as women (the scenes with Ghislaine etc) because you are writing a book. The reason this is a gamble is Jeffrey knows some of the most powerful people in publishing and, once alerted, will inevitably try to scare off potential buyers. But the upside is it should help you get a good agent.

I would have Brad use the phrase "sex trafficked" as that is a heads up about the book revealing more than we printed.

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To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
 From: Virginia Giuffre
 Sent: Wed 6/1/2011 12:05:04 AM
 Importance: Normal
 Subject: Re: VF
 Received: Wed 6/1/2011 12:05:04 AM

Hi Shazza,

I am going to ask Brad to inquire what the piece is about firstly and see what it is they want to write about before I sell VF any pic, not sure if it will even be financially viable or good publicity. What do you think a good price to sell this to VF should be? Also I am concluding my Synopsis today and was wondering If I could send it to you to read over before I start sending them out to agents. I know you know what they would be looking for and would be good to have you approve of my writing. I just cant believe that Sandra hasn't gotten back to me at all. It is a shame but it goes to show that her professional approach and seriousness towards the book were not the enthusiasm I was looking for anyways. How was your Memorial Day? I hope you had the day off to relax for once!! Let me know what you are thinking about all this...

Take Good Care,
 Jenna

--- On Tue, 31/5/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
 Subject: Re: VF
 To: [REDACTED]
 Received: Tuesday, 31 May, 2011, 1:00 PM

PS their piece is about PA -- but u are right to be concerned whose side they are taking. I think it is anti PA. Either way I'd go for a Brad statement.

From: Virginia Giuffre [REDACTED]
 Sent: Monday, May 30, 2011 11:43 PM
 To: Sharon Churcher
 Subject: Re: VF

Hi Shazza,

Good points, all of them. I am looking at both sides to the picture. On the upside it will give exposure to build up publicity for the case and the story but like you said, It must be carefully written and not give any notions about the upcoming book and or any new info. When i was doing some research into VF yesterday, it does concern me what they could want to write about me considering that B.Clinton walked into VF and threatened them not to write sex-trafficking articles about his good friend J.E. Should I be asking what is this story their writing pertaining to? I wouldn't want to give the public a bad image or anything like that. I don't know, it's all such a gamble. I just thank goodness for having a friend like you on the inside who knows how to deal with the viciousness of todays world!! I will let Brad know what you have recommended. Thanks Again!!!!

xoxoxoxo Jenna

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From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
 Subject: VF
 To: [REDACTED]
 Cc: "brad@pathjustice.com" <brad@pathjustice.com>
 Received: Monday, 30 May, 2011, 1:48 PM

I would let VF buy your picture via Brad. The big gamble would be to let him also give them a statement saying your

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24

Giuffre

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interviews with us were accurately reported and you have no more to say at this time about how you were "sex trafficked to PA and other men including two of the world's most respected politicians ([REDACTED] and [REDACTED] [REDACTED] as well as women (the scenes with Ghislaine etc) because you are writing a book. The reason this is a gamble is Jeffrey knows some of the most powerful people in publishing and, once alerted, will inevitably try to scare off potential buyers. But the upside is it should help you get a good agent. I would have Brad use the phrase "sex trafficked" as that is a heads up about the book revealing more than we printed.

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To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Wed 6/1/2011 12:34:25 AM
Importance: Normal
Subject: Re: VF
Received: Wed 6/1/2011 12:34:25 AM

Thanks Buddy, I will send it to you shortly!!!

--- On Wed, 1/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject: Re: VF
To: [REDACTED]
Received: Wednesday, 1 June, 2011, 12:11 AM

Darling sell them "one time usage" to the photo. It has been everywhere so no downside. They will offer you a price tied to their circulation. I would hold out for US2k minimum.
I will be honored to read the synopsis!
Shazza
X0

From: Virginia Giuffre [REDACTED]
Sent: Wednesday, June 01, 2011 01:05 AM
To: Sharon Churcher
Subject: Re: VF

Hi Shazza,

I am going to ask Brad to inquire what the piece is about firstly and see what it is they want to write about before I sell VF any pic, not sure if it will even be financially viable or good publicity. What do you think a good price to sell this to VF should be? Also I am concluding my Synopsis today and was wondering If I could send it to you to read over before I start sending them out to agents. I know you know what they would be looking for and would be good to have you approve of my writing. I just cant believe that Sandra hasn't gotten back to me at all. It is a shame but it goes to show that her professional approach and seriousness towards the book were not the enthusiasm I was looking for anyways. How was your Memorial Day? I hope you had the day off to relax for once!! Let me know what you are thinking about all this...

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Subject: Re: VF

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--- On Mon, 30/5/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>

Subject: VF

To: [REDACTED]

Cc: "brad@pathtojustice.com" <brad@pathtojustice.com>

Received: Monday, 30 May, 2011, 1:48 PM

I would let VF buy your picture via Brad. The big gamble would be to let him also give them a statement saying your interviews with us were accurately reported and you have no more to say at this time about how you were "sex trafficked to PA and other men including two of the world's most respected politicians [REDACTED] and [REDACTED] as well as women (the scenes with Ghislaine etc) because you are writing a book. The reason this is a gamble is Jeffrey knows some of the most powerful people in publishing and, once alerted, will inevitably try to scare off potential buyers. But the upside is it should help you get a good agent.

I would have Brad use the phrase "sex trafficked" as that is a heads up about the book revealing more than we printed.

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To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Thur 6/2/2011 4:26:51 AM
Importance: Normal
Subject: Re: VR- Synopsis
Received: Thur 6/2/2011 4:26:51 AM

Thanks buddy!! Glad to hear it...
xoxox Jenna

--- On Wed, 1/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject: Re: VR- Synopsis
To: [REDACTED]
Received: Wednesday, 1 June, 2011, 11:48 PM

Just dipped into this. It is BRILLIANT.

From: Virginia Giuffre [REDACTED]
Sent: Wednesday, June 01, 2011 11:41 PM
To: Sharon Churcher
Subject: VR- Synopsis

Hi Shazza,
Hope all is well for you today!! Here is my synopsis, I need your honest opinion and look forward to your feedback!!!

Thanks for this...
Jenna

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To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Thur 6/2/2011 9:48:27 PM
Importance: Normal
Subject: RE: VR- Synopsis
Received: Thur 6/2/2011 9:48:27 PM

Hi Shazza,

I cant believe I didn't pick up that error...Thank-You!!! Glad to hear that you think this is ready, I will compile a list of articles and let you know when I can send it all out. Yes, please let Jarred know I am ready and anyone else you might think is interested in this story. I am so stoked...we are on our way!!! YEAH..

xoxox Jenna

--- On Thu, 2/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject: RE: VR- Synopsis
To: "Virginia Giuffre" [REDACTED]
Received: Thursday, 2 June, 2011, 4:18 PM

Playboy club....spelling error! Anyway I think u have enough here to pitch agents. I would download and attach every article you can find about you and Jeffrey .

Shall I mention to Jarred Weisfeld that the synopsis is ready?

From: Virginia Giuffre [REDACTED]
Sent: 01 June 2011 18:41
To: Sharon Churcher
Subject: VR- Synopsis

Hi Shazza,

Hope all is well for you today!! Here is my synopsis, I need your honest opinion and look forward to your feedback!!!

Thanks for this...

Jenna

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Importance: Normal
 Subject: Re:
 Received: Sat 6/4/2011 2:51:41 AM
 VR-Cover Letter & Resume.docx

Hi Shazza,

Back from the E.R and **Personal** has got a torn ligament, could be much worse...phew!!! Anyways, I wasn't to sure exactly what to put in my profile so I included what I thought would be informative, but if this is not what you had in mind, let me know and I will fix it up. Thanks again for doing so much for me and my family!!

Sincerely,
 Jenna

--- On Sat, 4/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
 Subject: Re:
 To: [REDACTED]
 Received: Saturday, 4 June, 2011, 12:37 AM

Poor poor **Personal** Hope it isn't a break
 Shazza
 Xoxox

From: Virginia Giuffre [REDACTED]
 Sent: Saturday, June 04, 2011 01:14 AM
 To: Sharon Churcher
 Subject: Re:

Great stuff! I will send you it as soon as I get back home, just at hospital with **Personal** who may have broken his arm. Never dull moment around here! Lol! Anyways, thanks so much... Your incredible!
 Xoxoxo and many thanks,
 Jenna

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>;
 To: [REDACTED]
 Sent: Fri, Jun 3, 2011 11:05:07 PM

Jarred would like to see the package when u have it ready. I can send him our stories. U should write up a pit about yourself...a pen portrait like the author bios u see on book jackets.

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Importance: Normal
 Subject: Re:
 Received: Sat 6/4/2011 3:27:53 AM

Shazza,
 Big compliments coming from such a great writer like you!!! Thank you so much, you have lit up my day!!! I look forward to hearing back from you this weekend...have a good one!!

xoxoxoxo
 Jenna

--- On Sat, 4/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
 Subject: Re:
 To: [REDACTED]
 Received: Saturday, 4 June, 2011, 3:08 AM

This is grabbing. Spot on. The one aspect of this you need to address is how many names to name (of men) and when. I will go through your synopsis carefully over the weekend and then let's chat. One strategy would be to add in some examples with xxxx instead of names.

And thank goodness **Personal** is OK!
 S
 X0

From: Virginia Giuffre [REDACTED]
 Sent: Saturday, June 04, 2011 03:51 AM
 To: Sharon Churcher
 Subject: Re:

Hi Shazza,

Back from the E.R and **Personal** has got a torn ligament, could be much worse...phew!!! Anyways, I wasn't to sure exactly what to put in my profile so I included what I thought would be informative, but if this is not what you had in mind, let n know and I will fix it up. Thanks again for doing so much for me and my family!!

Sincerely,
 Jenna

--- On Sat, 4/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
 Subject: Re:
 To: [REDACTED]
 Received: Saturday, 4 June, 2011, 12:37 AM

Poor poor **Personal** Hope it isn't a break
 Shazza
 Xoxox

From: Virginia Giuffre [REDACTED]
 Sent: Saturday, June 04, 2011 01:14 AM
 To: Sharon Churcher
 Subject: Re:

Great stuff! I will send you it as soon as I get back home, just at hospital with **Personal** who may have broken his arm. Nev dull moment around here! Lol! Anyways, thanks so much... Your incredible!

Xoxoxo and many thanks,
Jenna

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>;
To: [REDACTED]
Sent: Fri, Jun 3, 2011 11:05:07 PM

Jarred would like to see the package when u have it ready. I can send him our stories. U should write up a pi about yourself...a pen portrait like the author bios u see on book jackets.

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To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Tue 6/7/2011 11:35:48 PM
Importance: Normal
Subject: Re:
Received: Tue 6/7/2011 11:35:48 PM

Hi Shazza,

Hope you had a great weekend!! We are ready to send it all away...fingers crossed Jarred loves it!! Thanks again for all o
your help and I will keep you informed of anything new. I hope you and hubby are doing well and I look forward to
speaking with you soon.

xoxoxoxo

Jenna

--- On Tue, 7/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject:
To: [REDACTED]
Received: Tuesday, 7 June, 2011, 12:56 PM

Why don't u send Jarred your synopsis, bio and some of the Australian and US pickup? I can send him our stuff.

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To: jarred lit agent/ producer [REDACTED]
From: Virginia Giuffre
Sent: Wed 6/8/2011 12:06:45 AM
Importance: Normal
Subject: Virginia Roberts- Synopsis & Profile
Received: Wed 6/8/2011 12:06:47 AM

FINAL DRAFT-SYNOPSIS.docx

VR-Cover Letter & Resume.docx

Convicted paedophile Jeffrey Epstein is facing a new criminal investigation and is involved in a civil suit with a lawyer - Tel.dat
daily telegraph June 02 2011.docx

Local News West Palm Beach, Palm Beach County, Martin & St. Lucie Counties The Palm Beach Post.webarchive

Prince Andrew's link to sex offender Jeffrey Epstein taints royalty in US UK news The Observer.webarchive

Prince Andrew He's just trying to massage export figures - Home News, UK - The Independent.webarchive

Secret Sex Lives.docx

The Total Collapse.docx

A unique resemblance....docx

Dear Jarred Weisfeld,

We spoke on the phone going back a couple months ago regarding the story I am writing called, The Billionaires Playbook Club. I am no longer under any contract and would like to ask you to review my synopsis and if you are interested I would love for you to represent me as my literary agent. I have included some of the press that has covered the ongoing case of Jeffrey Epstein, the worlds richest pedophile, and my good friend and journalist Sharon Churcher has a few from her article that she has written to send to you as well. I am very serious about getting my book published and believe this story will cover many genres of interest, not only by those following the lengthy case, but it is also a Woman's story of glitz, glamour, sorrow, compassion, and true love. I hope you enjoy....

Sincerely,
Virginia Roberts

To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Wed 6/8/2011 6:27:15 AM
Importance: Normal
Subject: Re: Virginia Roberts
Received: Wed 6/8/2011 6:27:15 AM

Dearest Shazza,

Once again you have really outdone yourself...MANY, MANY, THANKS!!!

I took the kids to the Australian Walkabout Park today and enjoyed the scenic walks and many kangaroos. Rob and I had good chuckle about our adventures at the Reptile Park with you and Mike ...good times!!! Have you heard from Mike? I hope he is well and if you ever speak, tell him I sent a BIG hello.

I really appreciate everything you have helped with, as a friend you have gone beyond the call of duty!!!

I hope we hear back from Jarred soon!!

xoxoxo Jenna

--- On Wed, 8/6/11, Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk> wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject: Virginia Roberts
To: "jarred halperin agent" [REDACTED]
Cc: "Virginia Giuffre" [REDACTED]
Received: Wednesday, 8 June, 2011, 2:31 AM

Hi Jarred

Hopefully you have Virginia's book pitch by now.

She has some amazing names which she can share with you in confidence and I think she also has a human interest story that could appeal to the Oprah/female set as well as the Wall Streeters who follow Epstein – a hedge fund king.

Here are a few of our stories about Virginia, plus some examples of the massive US and other international media pickup. Vanity Fair are doing a piece I believe in their August issue. The FBI have reopened the Epstein case due to Virginia's revelations. I also am attaching a link to a NY Magazine profile of Epstein....written before his world combusted. The FBI believe he was essentially running a private – and mobile -- brothel for some of the world's richest and most influential men.

He got off the first time round after retaining Kenneth Starr (who witchhunted Bill Clinton) and Alan Dershowitz (von Bulow's appeal lawyer, who inspired the movie Reversal of Fortune). The US Justice Dept is investigating corruption allegations against at least one prosecutor involved in the case.

Best regards,

Sharon

<http://www.dailymail.co.uk/news/article-1361039/Prince-Andrew-girl-17-sex-offender-friend-flew-Britain-meet-him.html>

<http://www.dailymail.co.uk/news/article-1363452/Bill-Clinton-15-year-old-masseuse-I-met-twice-claims-Epsteins-girl.html>

http://www.nypost.com/p/news/local/manhattan/pervy_mogul_lent_me_out_Balv1IrcQq9ADFIOXcwyoJ

http://blogs.villagevoice.com/runninscared/2011/02/virginia_robert.php

<http://billionaires.forbes.com/article/03rxgl12IP9nv> (This one, in Forbes Magazine, seems to require subscribing but you get the gist)

<http://www.telegraph.co.uk/news/uknews/theroyalfamily/8362690/Prince-Andrew.html>

<http://www.dailytelegraph.com.au/news/the-prince-a-paedophile-and-the-sex-slave-teen/story-e6frcuy9-1226013783994>

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EXHIBIT C

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

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES
_____ /

**JANE DOE #3 AND JANE DOE #4’S MOTION PURSUANT TO RULE 21 FOR
JOINDER IN ACTION**

COME NOW Jane Doe #3 and Jane Doe #4 (also referred to as “the new victims”), by and through undersigned counsel, to file this motion pursuant to Federal Rule of Civil Procedure 21 to join this action, on the condition that they not re-litigate any issues already litigated by Jane Doe #1 and Jane Doe #2 (also referred to as “the current victims”). The new victims have suffered the same violations of their rights under the Crime Victims’ Rights Act (CVRA) as the current victims. Accordingly, they desire to join in this action to vindicate their rights as well. Because the new victims will not re-litigate any issues previously litigated by the current victims (and because they are represented by the same legal counsel as the current victims), the Government will not be prejudiced if the Court grants the motion. The Court may “at any time” add new parties to the action, Fed. R. Civ. P. 21. Accordingly, the Court should grant the motion.¹

¹ As minor victims of sexual offenses, Jane Doe #3 and Jane Doe #4 desire to proceed by way of pseudonym for the same reasons that Jane Doe #1 and Jane Doe #2 proceeded in this

FACTUAL BACKGROUND

As the Court is aware, more than six years ago, Jane Doe #1 filed the present action against the Government, alleging a violation of her rights under the CVRA, 18 U.S.C. § 3771. DE1. She alleged that Jeffrey Epstein had sexually abused her and that the United States had entered into a secret non-prosecution agreement (NPA) regarding those crimes in violation of her rights. At the first court hearing on the case, the Court allowed Jane Doe #2 to also join the action. Both Jane Doe #1 and Jane Doe #2 specifically argued that the government had failed to protect their CVRA rights (inter alia) to confer, to reasonable notice, and to be treated with fairness. In response, the Government argued that the CVRA rights did not apply to Jane Doe #1 and Jane Doe #2 because no federal charges had ever been filed against Jeffrey Epstein.

The Court has firmly rejected the United States' position. In a detailed ruling, the Court concluded that the CVRA extended rights to Jane Doe #1 and Jane Doe #2 even though federal charges were never filed. DE 189. The Court explained that because the NPA barred prosecution of crimes committed against them by Epstein, they had "standing" to assert violations of the CVRA rights. *Id.* The Court deferred ruling on whether the two victims would be entitled to relief, pending development of a fuller evidentiary record. *Id.*

Two other victims, who are in many respects similarly situated to the current victims, now wish to join this action. The new victims joining at this stage will not cause any delay and their joinder in this case is the most expeditious manner in which to pursue their rights. Because the background regarding their abuse is relevant to the Court's assessment of whether to allow them to join, their circumstances are recounted here briefly.

fashion. Counsel for the new victims have made their true identities known to the Government.

Jane Doe #3's Circumstances

As with Jane Doe #1 and Jane Doe #2, Jane Doe #3 was repeatedly sexually abused by Epstein. The Government then concealed from Jane Doe #3 the existence of its NPA from Jane Doe #3, in violation of her rights under the CVRA. If allowed to join this action, Jane Doe #3 would prove the following:

In 1999, Jane Doe #3 was approached by Ghislaine Maxwell, one of the main women whom Epstein used to procure under-aged girls for sexual activities and a primary co-conspirator in his sexual abuse and sex trafficking scheme. In fact, it became known to the government that Maxwell herself regularly participated in Epstein's sexual exploitation of minors, including Jane Doe #3. Maxwell persuaded Jane Doe #3 (who was then fifteen years old) to come to Epstein's mansion in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children (including Jane Doe #1 and Jane Doe #2). When Jane Doe #3 began giving Epstein a "massage," Epstein and Maxwell turned it into a sexual encounter, as they had done with many other victims. Epstein then became enamored with Jane Doe #3, and with the assistance of Maxwell converted her into what is commonly referred to as a "sex slave." Epstein kept Jane Doe #3 as his sex slave from about 1999 through 2002, when she managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years. From 1999 through 2002, Epstein frequently sexually abused Jane Doe #3, not only in West Palm Beach, but also in New York, New Mexico, the U.S. Virgin Islands, in international airspace on his Epstein's private planes, and elsewhere.

Epstein also sexually trafficked the then-minor Jane Doe, making her available for sex to politically-connected and financially-powerful people. Epstein's purposes in "lending" Jane Doe

(along with other young girls) to such powerful people were to ingratiate himself with them for business, personal, political, and financial gain, as well as to obtain potential blackmail information.

One such powerful individual that Epstein forced then-minor Jane Doe #3 to have sexual relations with was former Harvard Law Professor Alan Dershowitz, a close friend of Epstein's and well-known criminal defense attorney. Epstein required Jane Doe #3 to have sexual relations with Dershowitz on numerous occasions while she was a minor, not only in Florida but also on private planes, in New York, New Mexico, and the U.S. Virgin Islands. In addition to being a participant in the abuse of Jane Doe #3 and other minors, Dershowitz was an eye-witness to the sexual abuse of many other minors by Epstein and several of Epstein's co-conspirators. Dershowitz would later play a significant role in negotiating the NPA on Epstein's behalf. Indeed, Dershowitz helped negotiate an agreement that provided immunity from federal prosecution in the Southern District of Florida not only to Epstein, but also to "any potential co-conspirators of Epstein." NPA at 5. Thus, Dershowitz helped negotiate an agreement with a provision that provided protection for himself against criminal prosecution in Florida for sexually abusing Jane Doe #3. Because this broad immunity would have been controversial if disclosed, Dershowitz (along with other members of Epstein's defense team) and the Government tried to keep the immunity provision secret from all of Epstein's victims and the general public, even though such secrecy violated the Crime Victims' Rights Act.

Ghislaine Maxwell was another person in Epstein's inner circle and a co-conspirator in Epstein's sexual abuse. She was someone who consequently also appreciated the immunity granted by the NPA for the crimes she committed in Florida. In addition to participating in the

sexual abuse of Jane Doe #3 and others, Maxwell also took numerous sexually explicit pictures of underage girls involved in sexual activities, including Jane Doe #3. She shared these photographs (which constituted child pornography under applicable federal laws) with Epstein. The Government is apparently aware of, and in certain instances possesses some of these photographs.

Perhaps even more important to her role in Epstein's sexual abuse ring, Maxwell had direct connections to other powerful individuals with whom she could connect Epstein. For instance, one such powerful individual Epstein forced Jane Doe #3 to have sexual relations with was a member of the British Royal Family, Prince Andrew (a/k/a Duke of York). Jane Doe #3 was forced to have sexual relations with this Prince when she was a minor in three separate geographical locations: in London (at Ghislaine Maxwell's apartment), in New York, and on Epstein's private island in the U.S. Virgin Islands (in an orgy with numerous other under-aged girls). Epstein instructed Jane Doe #3 that she was to give the Prince whatever he demanded and required Jane Doe #3 to report back to him on the details of the sexual abuse. Maxwell facilitated Prince Andrew's acts of sexual abuse by acting as a "madame" for Epstein, thereby assisting in internationally trafficking Jane Doe #3 (and numerous other young girls) for sexual purposes.

Another person in Epstein's inner circle of friends (who becomes apparent with almost no investigative effort) is Jean Luc Brunel. Epstein sexually trafficked Jane Doe #3 to Jean Luc Brunel many times. Brunel was another of Epstein's closest friends and a regular traveling companion, who had many contacts with young girls throughout the world. Brunel has been a model scout for various modeling agencies for many years and apparently was able to get U.S.

passports for young girls to “work” as models. He would bring young girls (ranging to ages as young as twelve) to the United States for sexual purposes and farm them out to his friends, especially Epstein. Brunel would offer the girls “modeling” jobs. Many of the girls came from poor countries or impoverished backgrounds, and he lured them in with a promise of making good money. Epstein forced Jane Doe #3 to observe him, Brunel and Maxwell engage in illegal sexual acts with dozens of underage girls. Epstein also forced Jane Doe #3 to have sex with Brunel on numerous occasions, at places including Epstein’s mansion in West Palm Beach, Little St. James Island in the U.S. Virgin Islands (many including orgies that were comprised of other underage girls), New York City, New Mexico, Paris, the south of France, and California.

Epstein also trafficked Jane Doe #3 for sexual purposes to many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders. Epstein required Jane Doe #3 to describe the events that she had with these men so that he could potentially blackmail them.

The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA. Moreover, even a rudimentary investigation of Jane Doe #3’s relationship to Epstein would have revealed the fact that she had been trafficked throughout the United States and internationally for sexual purposes. Nonetheless, the Government secretly negotiated a non-prosecution agreement with Epstein precluding any Federal prosecution in the Southern District of Florida of Epstein and his co-conspirators. As with Jane Doe #1, and Jane Doe #2, the Government concealed the non-prosecution agreement from Jane Doe #3 – all in violation of her rights under the CVRA – to avoid Jane Doe #3 from raising powerful objections to the NPA that would have shed tremendous public light on Epstein

and other powerful individuals and that would likely have been prevented it from being concluded in the secretive manner in which it was.

Jane Doe #4's Circumstances

If permitted to join this action, Jane Doe #4 would allege, and could prove at trial, that she has CVRA claims similar to those advanced by Jane Doe #1 and Jane Doe #2, based on the following:

As with the other Jane Does, Jane Doe #4 was repeatedly sexually abused by Epstein. In or around the summer of 2002, Jane Doe #4, an economically poor and vulnerable sixteen-year-old child, was told by another one of Epstein's underage minor sex abuse victims, that she could make \$300 cash by giving an old man a massage on Palm Beach. An acquaintance of Jane Doe #4 (also a minor sexual abuse victim of Epstein) telephoned Epstein and scheduled Jane Doe #4 to go to Epstein's house to give him a massage. During that call, Epstein himself got on the phone (a means of interstate communication) with Jane Doe #4, asking her personally to come to his mansion in Palm Beach.

Jane Doe #4 then went to Epstein's mansion and was escorted upstairs to Epstein's large bathroom by one of Epstein's assistants. Shortly thereafter Jeffrey Epstein emerged and lay face down on the table and told Jane Doe #4 to start massaging him. Epstein asked Jane Doe #3 her age and she told him she had recently turned sixteen. Epstein subsequently committed illegal sexual acts against Jane Doe #4 on many occasions.

Epstein used a means of interstate communication (i.e., a cell phone) to arrange for these sexual encounters. Epstein also frequently travelled in interstate commerce (i.e., on his personal jet) for purposes of illegally sexually abusing Jane Doe #4.

January. In the meantime, however, counsel for the victims believe that it is no longer appropriate to delay filing this motion and accordingly file it at this time. Because the Government is apparently opposing this motion, Jane Doe #3 and Jane Doe #4 have described the circumstances surrounding their claims so that the Court has appropriate information to rule on the motion.

CONCLUSION

Jane Doe #3 and Jane Doe #4 should be allowed to join this action, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Their joinder should be conditioned on the requirement that they not re-litigate any issues previously litigated by Jane Doe #1 and Jane Doe #2. A proposed order to that effect is attached to this pleading.

DATED: December 30, 2014

Respectfully Submitted,

/s/ Bradley J. Edwards

Bradley J. Edwards
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Telephone (954) 524-2820
Facsimile (954) 524-2822
E-mail: brad@pathtojustice.com

And

Paul G. Cassell
Pro Hac Vice
S.J. Quinney College of Law at the
University of Utah
332 S. 1400 E.
Salt Lake City, UT 84112
Telephone: 801-585-5202

Facsimile: 801-585-6833
E-Mail: cassellp@law.utah.edu

Attorneys for Jane Doe #1 and Jane Doe #2

CERTIFICATE OF SERVICE

I certify that the foregoing document was served on December 30, 2014, on the following
using the Court's CM/ECF system:

Dexter Lee
A. Marie Villafaña
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401
(561) 820-8711
Fax: (561) 820-8777
E-mail: Dexter.Lee@usdoj.gov
E-mail: ann.marie.c.villafana@usdoj.gov

Attorneys for the Government

/s/ Bradley J. Edwards

EXHIBIT 4

(Filed Under Seal)

Sigrid McCawley

From: Sigrid McCawley
Sent: Tuesday, May 17, 2016 3:53 PM
To: Laura Menninger; Meredith Schultz; Jeff Pagliuca
Cc: 'brad@pathtojustice.com' (brad@pathtojustice.com); Paul Cassell (cassellp@law.utah.edu)
Subject: RE: Notice of Subpoena
Attachments: May-June 2016 Deposition Calendar.pdf

Hello Laura – We are working on the calendar and I have it almost complete but I was awaiting confirmation on a date from Mr. Rizzo's counsel so I didn't want to send it out prematurely and that was delaying me.

We were serving subpoenas on dates that we thought are grouped within the locations/date ranges we discussed during the meet and confer and since we have been having an extraordinarily difficult time serving witnesses who appear to be attempting to evade service we need to keep that process moving.

We do intend to work with you on dates as we discussed. Attached is the proposed calendar with the caveat that dates may shift if witnesses make change requests but we are doing our best to group locations together where possible.

Again – this is not final as I noted I believe you had some dates you were gone but were checking with Jeff to determine his availability.

Finally, we are writing to confer whether you will stipulate that we may exceed the 10 deposition limit to complete discovery in this case or whether we need to file a motion with the Court on that issue.

Thank you,
Sigrid

Sigrid S. McCawley
Partner

BOIES, SCHILLER & FLEXNER LLP

401 East Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301

Phone: 954-356-0011 ext. 4223

Fax: 954-356-0022

<http://www.bsflp.com>

From: Laura Menninger [mailto:lmenninger@hmflaw.com]
Sent: Tuesday, May 17, 2016 3:19 PM
To: Meredith Schultz; Jeff Pagliuca
Cc: Sigrid McCawley; 'brad@pathtojustice.com' (brad@pathtojustice.com); Paul Cassell (cassellp@law.utah.edu)
Subject: Re: Notice of Subpoena

Sigrid and Brad -

We had a conferral last week in which you promised to provide for conferral purposes a proposed schedule for depositions we both had requested in various locations. Rather than provide any such schedule, you have instead sent us notices for approximately 7 depositions in NY and Florida, one for an individual who you did not mention deposing and who does not appear among the extensive list of witnesses in your Rule 26 disclosures.

If you do not intend to abide by the representations you made in our conferral, then please advise and we will once again be forced to seek intervention of the Court. See Local Rule 26.4.

-Laura

From: Meredith Schultz <mschultz@BSFLLP.com>

Date: Tuesday, May 17, 2016 at 1:08 PM

To: Laura Menninger <lmenninger@hmflaw.com>, Jeff Pagliuca <jpagliuca@hmflaw.com>

Cc: Sigrid McCawley <smccawley@bsfllp.com>, Brad Edwards <brad@pathtojustice.com>, Paul Cassell <cassellp@law.utah.edu>

Subject: Notice of Subpoena

Laura,

Please see the attached documents.

Thanks,

Meredith

Meredith L. Schultz
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Phone: 954-356-0011 ext. 4204
Fax: 954-356-0022
<http://www.bsfllp.com>

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Virginia Giuffre v. Ghislaine Maxwell

Case no. 15-cv-07433-RWS

MAY 2016

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18 Deposition of Johanna Sjoberg Ft. Lauderdale, FL (confirmed)	19	20 Deposition of Sky Roberts Oxford, FL (confirmed)	21
22	23	24 Deposition of Lynn Miller Denver, CO (confirmed although location may change per Menninger)	25	26 Deposition of Dr. Steven Olson Denver, CO (confirmed)	27	28
29	30	31 Deposition of Juan Alessi Ft. Lauderdale, FL (subpoena served)				

Virginia Giuffre v. Ghislaine Maxwell

Case no. 15-cv-07433-RWS

June 2016

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1 Deposition of Maria Alessi Ft. Lauderdale, FL (subpoena served) and/or Jean Luc Brunel	2 Deposition of James Michael Austrich Ocala, FL (subpoena served but Maxwell's counsel needs to confirm date change with witness)	3 Deposition of David Rodgers Ft. Lauderdale, FL (subpoena served)	4 Deposition of [REDACTED] Ft. Lauderdale, FL (served)
5	6	7 Deposition of Jean Luc Brunel New York, NY (possible date)	8 Deposition of [REDACTED] New York/New Jersey	9 Deposition of JoJo Fontanella New York, NY	10 Deposition of Rinaldo Rizzo Armonk, NY (confirmed)	11
12	13	14 Deposition of Jeffrey Epstein New York, NY	15 Deposition of Jared Weisfeld/ Sharon Churcher (or find additional date if they will be too long)	16 Deposition of Nadia Marcinkova Armonk, NY	17	18
19	20 Deposition of Detective Joe Recarey Ft. Lauderdale, FL	21 Deposition of [REDACTED] Ft. Lauderdale, FL	22 Deposition of Sarah Kellen New York, NY	23	24	25

Virginia Giuffre v. Ghislaine Maxwell

Case no. 15-cv-07433-RWS

26	27	28 Deposition of Emmy Taylor California or London (possible date not served with subpoena yet)	29 (Other California witnesses if needed)	30 Deposition of Ross Gow (possible date)		
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***Week of June 20 – 24 may be bad for Maxwell's counsel (please confirm)

****Week of June 27 – July 1st may be bad for Maxwell's counsel (please confirm)

*****Need to confirm Maxwell will accept service for her agent Ross Gow.

There may be a few other witnesses that we may need to add if they can't confirm attendance at trial.

EXHIBIT 13

(Filed Under Seal)

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**PLAINTIFF, VIRGINIA GIUFFRE'S THIRD REVISED DISCLOSURE
PURSUANT TO FED. R. CIV. P. 26**

COMES NOW the Plaintiff, Virginia L. Giuffre, by and through her undersigned counsel,
and serves this revised disclosure pursuant to Fed. R. Civ. P. 26 and states as follows:

A. Witnesses:

1. Virginia L. Giuffre
c/o Sigrid S. McCawley, Esq.
Boies, Schiller & Flexner LLP
401 East Las Olas Boulevard, Suite 1200
Miami, Florida 33301
Tel: (954) 356-0011
Email: smccawley@bsfllp.com

Plaintiff - Information regarding Defendant, Ghislaine Maxwell's conduct that is
the subject of this action.
2. Ghislaine Maxwell
c/o Laura A. Menninger, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: (303) 831-7364
Email: lmenninger@hmflaw.com

Defendant in this action.

CONFIDENTIAL

3. Juan Alessi

[REDACTED]
Boynton Beach, FL 33472

Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

4. Maria Alessi

[REDACTED]
Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

5. Kathy Alexander

Address unknown at this time.

Telephone number unknown at this time.

Believed to be in South Africa.

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

6. Miles Alexander

Address unknown at this time.

Telephone number unknown at this time.

Believed to be in South Africa.

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

7. Doug Band

President of Teneo Holdings, 601 Lexington Avenue, 45th Floor,
New York, NY 10022, Tel: (212) 886-1600

Was present on flights with Jeffrey Epstein and Ghislaine Maxwell and President Clinton and may have knowledge of Jeffrey Epstein and Ghislaine Maxwell's sexual trafficking conduct and interactions with minors.

8. Gwendolyn Beck

[REDACTED]
[REDACTED]

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

9. Sophie Biddle

[REDACTED]

[REDACTED]

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

10.

[REDACTED]

Was present on flights with Jeffrey Epstein, Ghislaine Maxwell and Virginia Guiffre and may have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

11. Fary Bjorlin
Address Unknown
Telephone Number Unknown

May have information relating to Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

12.

[REDACTED]

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

13. Jean Luc Brunel
c/o Joe Titone, Esq.
621 South East 5th Street, Pompano Beach, FL 33060
Tel: (954) 729-6490

Was present on flights with Jeffrey Epstein, Ghislaine Maxwell and Virginia Guiffre and has information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

14. Ron Burkle
Address unknown at this time
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

15.

Worked for Ghislaine Maxwell and has information about Ghislaine Maxwell's recruiting of girls for Jeffrey Epstein.

16. Carolyn Casey
Address unknown at this time.
Telephone number unknown at this time.

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

17. Alyson Chambers
c/o Marshall Dore Louis, Esq.
Sinclair, Louis & Zavertnik, P.A.
40 N.W. 3rd Street, Suite 200, Miami, FL 33128
Tel: (305) 374-0544

Worked for Jeffrey Epstein as a masseuse during the time that Virginia Giuffre was living and traveling with Jeffrey Epstein and Ghislaine Maxwell, and has information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

18. William Jefferson Clinton
55 West 125 Street
New York, NY 10027

Travelled with Jeffrey Epstein and Ghislaine Maxwell and may have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

19. Maximilia Cordero
Address unknown at this time
Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

20. Valdson Cotrin
Address unknown at this time
Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

21. Chauntae Davies
[REDACTED]
Telephone number unknown at this time

Was present on flights with Jeffrey Epstein, Ghislaine Maxwell and may have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

22. Teala Davies

[REDACTED]

Telephone number unknown at this time

Was present on flights with Jeffrey Epstein, Ghislaine Maxwell and may have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

23. Anouska DeGeorgieou

[REDACTED]

Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

24. Alan Dershowitz
c/o Richard A. Simpson, Esq.
WILEY REIN, LLP
1776 K Street NW
Washington, D.C. 20006
Tel: (202) 719-7000

Has knowledge of Defendant's conduct that is the subject of this action.

25. Ryan Dionne
Address unknown at this time
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

26. Eva Anderson Dubin

[REDACTED]
[REDACTED]

Telephone number unknown at this time

Was present on flights with Jeffrey Epstein, Ghislaine Maxwell and has information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

27. Glen Dubin

[REDACTED]
[REDACTED]

Telephone number unknown at this time

Was present on flights with Jeffrey Epstein, Ghislaine Maxwell and has information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

28.



May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

29. Prince Andrew Albert Christian Edward, Duke of York
Buckingham Palace Rd, London SW1A 1AA
Tel: 020 7766 7300

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors, including Virginia Giuffre.

30. Records Custodian for Travel for Prince Andrew Albert Christian Edward, Duke of York
Buckingham Palace Rd, London SW1A 1AA
Tel: 020 7766 7300

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors, including Virginia Giuffre.

31. Jeffrey Epstein
c/o Marty Weinberg, Esq.
20 Park Plaza, Suite 1000, Boston, MA 02116
Tel: (617) 227-3700

Has knowledge of Defendant's conduct that is the subject of this action and knowledge of his sexual trafficking operation and other co-conspirators.

32. Tatiana Espinoza
Address unknown at this time
Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

33. Annie Farmer
Address unknown at this time.
Telephone number unknown at this time.

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors, including Virginia Giuffre.

34. Marie Farmer
Address unknown at this time.
Telephone number unknown at this time.

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors, including Virginia Giuffre.

35. Vicky Ward
Address unknown at this time
Telephone unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors, including Virginia Giuffre.

36. Frederic Fekkai
Address unknown at this time
Telephone number unknown at this time

Has knowledge of Defendant's conduct that is the subject of this action.

37. Tony Figueroa
[REDACTED]
Telephone number unknown at this time

Has knowledge of Defendant's conduct that is the subject of this action.

38. Luciano "Jojo" Fontanilla
[REDACTED]
[REDACTED]

Jeffrey Epstein's staff member in his various homes and may have knowledge of Defendant and Jeffrey Epstein's inappropriate conduct with underage girls.

39. Lynn Fontanilla
[REDACTED]
Telephone number unknown at this time

May have knowledge of Defendant's conduct that is the subject of this action.

40. Michael Friedman
[REDACTED]
Telephone number unknown at this time

Former house staff and may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with minors.

41. Rosalie Friedman
[REDACTED]

Telephone number unknown at this time

Former house staff and may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with minors.

42. Ross Gow
Acuity Representation
23 Berkeley Square
London W1J 6HE

Defendant's press agent who has knowledge of the defamatory statements in this case.

43. Tiffany Kathryn Gramza

Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

- 44.

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

45. Amanda Grant
Address unknown at this time
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

46. Lesley Groff
Address unknown at this time
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

- 47.



Has information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and abuse and interaction with underage minors.

48. Claire Hazel
Address unknown at this time
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

49. Shelly Harrison
Address unknown at this time
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

50. Gina Ignatieva
Address Unknown
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

51. Brett Jaffe
Address noted on Defendant's Rule 26 disclosures

Defendant's attorney.

- 52.



Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

53. Sarah Kensington Vickers formerly Sarah Kellen

c/o Bruce Reinhart, Esq.
McDonald Hopkins LLC
505 S Flagler Dr Ste 300
West Palm Beach, FL 33401-5942
Tel: 561- 472-2121

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interactions with minors.

54. Tatiana Kovylna

[REDACTED]

Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

55.

[REDACTED]

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

56. Adam Perry Lang

Address unknown at this time

Telephone number unknown at this time

Traveling chef for Jeffrey Epstein and Ghislaine Maxwell and may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

57.

[REDACTED]

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

58. Michael Liffman

Address unknown at this time

Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

59. Peter Listerman

Address unknown at this time

Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

60. Cindy Lopez

Address unknown at this time

Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

61. Melinda Lutz
Address unknown at this time
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

62. Cheri Lynch
Address unknown at this time
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

63. Nadia Marcinko formerly Nadia Marcinkova
c/o Jack Goldberger, Esq.
Atterbury, Goldberger, & Weiss, P.A.
250 Australian Ave South, Ste 1400
West Palm Beach, FL 33401-5012
Tel: (561) 659-8300

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

64. Bob Meister

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

65. Todd Meister

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

66. Brahakmana Mellawa
Address unknown at this time
Telephone number unknown at this time

House staff who may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

67. Jayarukshi Mellowa
Address unknown at this time
Telephone number unknown at this time

House staff who may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

68.



Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.


69. Andrea Mitrovich
Address Unknown
Telephone number unknown at this time.

Knowledge of Defendant's conduct that is the subject of this action.

70. Bill Peadon



House staff that may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

71. Francis Peadon

Telephone number unknown at this time

House staff that may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

72.



Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

73. Dara Preece
Address Unknown
Telephone Unknown at this time

May have knowledge of Defendant's conduct in this action.

74. Louella Rabuyo
Address unknown at this time
Telephone unknown at this time

House staff that may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

75. Joseph Recarey

[REDACTED]

Detective Recarey was the chief investigator of the crimes committed at Jeffrey Epstein's Palm Beach mansion and has information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

73. Chief Michael Reiter

[REDACTED]

Police Chief Reiter oversaw the investigation of the crimes committed at Jeffrey Epstein's Palm Beach mansion and has information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and abuse of underage minors.

74. Bill Richardson
Address unknown at this time
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

75. Rinaldo Rizzo
c/o Robert Lewis, Esq.
Freeman Lewis LLP
228 E. 45th Street, 17th Floor
New York, NY 10017
Tel: 212-980-4084

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

76. Haley Robson
Address unknown at this time
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

77. David Rodgers

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

78. Adriana Ross formerly Adriana Mucinska

[REDACTED]
[REDACTED]

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

79. Johanna Sjoberg

[REDACTED]
[REDACTED]
[REDACTED]

Worked for Jeffrey Epstein during the time when Virginia Giuffre was living and traveling with Jeffrey Epstein and Ghislaine Maxwell. Johanna Sjobjerg was also present at an occasion with Prince Andrew, Ghislaine Maxwell, and Virginia Giuffre when Ms. Giuffre was a minor.

80. Kelly Spamm
Address unknown at this time
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

81. Cecilia Stein
Address unknown at this time
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

82. Emmy Taylor
Address unknown at this time
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

83. Evelyn Valenzuela
Address unknown at this time
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

84. Larry Visosky

[REDACTED]
[REDACTED]
[REDACTED]

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

85. Leslie Wexner

[REDACTED]
[REDACTED]
[REDACTED]

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

86. Courtney Wild

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Has information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

87. Igor Zinoviev
Address unknown at this time
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

88. All females identified in the police reports or identified through the United State's Attorney's office during or through the criminal investigation of Jeffrey Epstein and his co-conspirators.

89. All other then-minor girls, recruited by Ghislaine Maxwell, whose identities Ms. Giuffre will attempt to determine, with whom Defendant, Ghislaine Maxwell and Jeffrey Epstein, have engaged in sexual activity.
90. All pilots, chauffeurs, chefs, and other employees of either Defendant Maxwell or Jeffrey Epstein with knowledge of Defendant and Jeffrey Epstein's inappropriate conduct with underage girls.
91. All staff and employees at the Mar-a-Lago Club during 1999-2002.
92. All other witnesses learned through discovery process.

B. Relevant Documents:

1. All files held by the Palm Beach Police Department or the Palm Beach State Attorney's office which are publically available.
2. All press releases of Ghislaine Maxwell or on her behalf.
3. The video(s) of Ghislaine Maxwell adopting the January, 2015 press statement.
4. All newspaper or other media where Ghislaine Maxwell's press release appears.
5. All evidence obtained by the Federal Bureau of Investigations which relate in any way to Jeffrey Epstein or Ghislaine Maxwell.
6. All 302 statements that relate in any way to Jeffrey Epstein or Ghislaine Maxwell.
7. All evidence obtained by the FBI or United States Attorney's office by or through the criminal investigation of Alfredo Rodriguez.
8. All documents relating to the previous subpoenas served on Defendant for her deposition and all documents related in any way to that deposition.
9. All documents evidencing visitors or passengers at any of Jeffrey Epstein owned or controlled property or aircraft.
10. All documents demonstrating the relationship between Bill Clinton and Jeffrey Epstein or Ghislaine Maxwell.
11. All photos of Ghislaine Maxwell at Chelsea Clinton's wedding.
12. All documents or information refuting statements made by Ghislaine Maxwell.
13. All documents and information relating to Prince Andrews travel, including travel to New York City and the Caribbean, in 1999 to 2002.

C. Exhibits:

1. Palm Beach Police Department report and documents contained within Jeffrey Epstein's criminal files, attached hereto as Exhibit 1.
2. March 10, 2011 Statement on behalf of Ghislaine Maxwell by Media agent Ross Gow, attached hereto as Exhibit 2.
3. September 3, 2008 Victim Notification Letter, attached hereto as Exhibit 3.
4. May 1, 2009 Complaint in Jane Doe No. 102 v. Jeffrey Epstein, CIV-09-80656, in the Southern District of Florida, attached hereto as Exhibit 4.
5. FBI 302 Statement, attached hereto as Exhibit 5.
6. Flight Logs, attached hereto as Composite Exhibit 6.
7. Message Pads from Law Enforcement from trash pull of Jeffrey Epstein's Palm Beach home, attached hereto as Exhibit 7.
8. Jeffrey Epstein's Phone Book, also referred to as his "Black Book," attached hereto as Exhibit 8.
9. Deposition of Sarah Kellen, attached hereto as Composite Exhibit 9.
10. Deposition Transcripts of Juan Alessi, attached hereto as Exhibit 10.
11. Deposition Transcripts of Alfredo Rodriguez, attached hereto as Exhibit 11.
12. January 2, 2015 Corrected Joinder Motion [DE 280] filed in the CVRA action pending in the Southern District of Florida, attached hereto as Exhibit 12. **[All paragraphs between "The Government then concealed from Jane Doe No. 3 the existence of the NPA (pg. 3) and "The Government was well aware of Jane Doe No. 3 when it was negotiating the NPA" (pg. 6) were stricken by Judge Marra.]**
13. January 21, 2015 Declaration of Jane Doe No. 3 filed in the CVRA action pending in the Southern District of Florida, attached hereto as Exhibit 13. **[Paragraphs 4, 5, 7, 11, 13, 15, 19-53, and 59 were stricken by Judge Marra]**
14. February 6, 2015 Declaration of Jane Doe No. 3 filed in the CVRA action pending in the Southern District of Florida, attached hereto as Exhibit 14. **[Paragraphs 7-12, 16, 39 and 49 were stricken by Judge Marra.]**
15. November 25, 2015 Affidavit of Virginia Giuffre, filed in the *Bradley Edwards and Paul Cassell v. Alan Dershowitz* matter, pending in the Seventeenth Judicial Circuit, Broward County, Florida, attached hereto as Exhibit 15.
16. Virginia Roberts' passport, attached hereto as Exhibit 16.

17. Judge Thomas Lynch's January 12, 2016 Confidentiality Order regarding Virginia Giuffre's deposition, attached hereto as Exhibit 17.
18. Documents produced and bates labelled Non-Party VR 000001 – Non-Party VR 000644, in the *Bradley Edwards and Paul Cassell v. Alan Dershowitz* matter, pending in the Seventeenth Judicial Circuit, Broward County, Florida, attached hereto as Exhibit 18.
19. Victims Refuse Silence Articles of Incorporation and Amendment, attached hereto as Composite Exhibit 19.
20. Victims Refuse Silence By-laws, attached hereto as Exhibit 20.
21. Victims Refuse Silence 2016 Annual Report, attached hereto as Exhibit 21.
22. January 3, 2015 Daily Mail article: "Harvard Law Professor Named Alongside Prince Andrew in 'Sex Slave' Case Accuses Alleged Victim of 'Making Up Stories,'" attached hereto as Exhibit 22.
23. January 3, 2015 Press Statement issued by Ross Gow to Express set forth in "Ghislaine Maxwell: I was not a madam for paedophile," attached as Exhibit 23.
24. January 4, 2015 Statement by Ghislaine Maxwell to New York Daily News Reporter "Alleged Madam Accused of Supplying Prince Andrew With Underage Teen for Sex Spotted in NYC – As He's Seen Cutting Swiss Vacation Short to Face Queen," attached hereto as Exhibit 24.
25. February 1, 2015 Mirror article: "Prince Andrew's Pal Ghislaine Maxwell May Sue Over Madam Allegations," attached hereto as Exhibit 25.
26. September 23, 2007 Red Ice Creations Article "Prince Andrew's Friend, Ghislaine Maxwell, Some Underage Girls, and A Very Disturbing Story," attached hereto as Exhibit 26.
27. Photographs, attached hereto as Exhibit 27.
28. April 13, 2010 Deposition Transcript of Nadia Marcinkova, attached hereto as Exhibit 28.

D. Computation of Damages:

- I. Physical, psychological and psychiatric injuries and resulting medical expenses – in an amount of approximately \$ 102,200 present value.
 - a. **Computation Analysis:**
 - i. Giuffre has had to receive treatment for the psychological harm as a result of Maxwell's conduct towards Giuffre.

- ii. The average annual expenditures for mental health services for adults 18-64 in the United States is \$1,751.
- iii. Giuffre needs continuing care as a result of the harm she has suffered. Ms. Giuffre was born August 9, 1983 and was 31.4 years old at the beginning of 2015 when the alleged harm occurred. The average remaining life expectancy for a 31 year old female is 51.1 years.
- iv. Based on a remaining life expectancy of 51.1 years, annual healthcare cost growth of 3.3% and a discount rate of 2.7%, the present value of expected treatment costs is \$102,200 as of 1/1/2015.

b. **Supporting Evidence:**

- i. Ms. Giuffre is in the process of collecting records from her physicians
- ii. Ms. Giuffre's testimony
- iii. Ms. Giuffre is in the process of retaining an expert to calculate damages, and will provide further information through expert disclosure.

2. Past, present and future pain and suffering, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of standing in the community, loss of dignity and invasion of privacy in her public and private life not less than \$30,000,000.00.

a. **Computation Analysis**

- i. Under New York law, defamation per se as alleged in this case presumes damages and special damages do not need to be plead and proven. *See Celle v. Filipino Reporter Enterprises Inc.*, 209 F.3d 163, 179 (2nd Cir. 2000) (Second Circuit holding that "[i]f a statement is defamatory per se, injury is assumed. In such a case 'even where the plaintiff can show no actual damages at all, a plaintiff who has otherwise shown defamation may recover at least nominal damages' and the Second Circuit also confirmed an award of punitive damages). Ms. Giuffre has been severely damaged by the defamation of the defendant, by calling her claims of sexual abuse "obvious lies". The defamation caused Ms. Giuffre to re-live the sexual abuse she previously endured. Ms. Giuffre has suffered and continues to suffer from the pain, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of standing in the community, loss of dignity and invasion of privacy in her public and private life. The computation of this amount is in the province of the jury but Ms. Giuffre contends,

including but not limited to, awards in other similar matters, that the amount is not less than \$30,000,000.00. Ms. Giuffre is in the process of retaining an expert, and will provide further information through expert disclosure.

b. Supporting Evidence

- i. Ms. Giuffre's testimony
- ii. Witness testimony
- iii. Awards in similar matters
- iv. Ms. Giuffre is in the process of retaining an expert, and will provide further information through expert disclosure.

3. Estimated lost income of \$180,000 annually. Present value of \$3,461,000 to \$5,407,000.

a. Computation Analysis

- i. Ms. Giuffre's estimated compensation capacity is \$180,000 annually. Ms. Giuffre was born August 9, 1983 and was 31.4 years old at the beginning of 2015 when the alleged injury occurred. Her expected remaining work life based on mortality and probability of continued work was 20.2 years. Based on these factors, a 2% annual growth rate and a 2.4% discount rate, the present value of lost compensation is \$3,461,000 as of 1/1/2015.
- ii. Alternatively, if Ms. Giuffre is assumed to work until a normal retirement age of 65, or 33.6 years from her age at the beginning of 2015, and based on an annual growth rate of 2.0% and a discount rate of 2.7%, the present value of lost compensation is \$5,407,000 as of 1/1/2015.

b. Supporting Evidence

- i. Materials regarding compensation and work life expectancy
 - 1) 2010 Life Table for Females, *National Vital Statistics Report*, November 6, 2014, U.S. Department of Health & Human Services, Centers for Disease Control & Prevention, National Center for Health Statistics.

- 2) "Calculation of Work life Expectancy Using the Life, Participation, Employment Method," Vocational Econometrics, Inc.
 - 3) Consumer Price Index for Urban Wage Earners and Clerical Workers, United States Department of Labor, Bureau of Labor Statistics.
 - 4) Federal Reserve Statistical Release H.15, 1/5/2015.
- ii. Ms. Giuffre's testimony
 - iii. Ms. Giuffre is in the process of retaining a damages expert and will provide further information through expert disclosures.
4. **Punitive Damages** - to be based upon all relevant factors, including the egregious nature of Defendant, Ghislaine Maxwell's conduct and the need for a large award to punish and deter conduct in view of the vast wealth of Defendant Maxwell, in an amount not less than \$50,000,000.00.
 - a. This calculation is in the province of the jury.

Dated: June 1, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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¹ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the above and foregoing Disclosure Pursuant to Fed. R. Civ. P. 26 has been provided by United States mail and electronic mail to all counsel of record identified below, on this 1st day of June, 2016.

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By: /s/ Sigrid McCawley
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