

[REDACTED],  
Plaintiff(s),

vs.

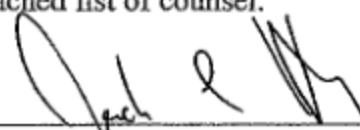
JEFFREY EPSTEIN and [REDACTED],

Defendant(s).

**NOTICE OF SERVING**  
**ANSWERS TO INTERROGATORIES**

COMES NOW the Plaintiff, [REDACTED], by and through undersigned counsel, and hereby files this Notice with the Court that Answers to Interrogatories propounded by the Defendant, JEFFREY EPSTEIN, on January 16, 2009, have been furnished to the attorney for the Defendant.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by mail this 18<sup>th</sup> day of February, 2009, to: See attached list of counsel.

  
\_\_\_\_\_  
JACK SCAROLA  
Florida Bar No.: 169440  
JACK P. HILL  
Florida Bar No.: 0547808  
Searcy Denney Scarola Barnhart & Shipley, P.A.

[REDACTED]  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorney for Plaintiff(s)



**ANSWERS TO INTERROGATORIES**

1. What is the name and address of all persons answering or assisting in answering these interrogatories, and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?

**ANSWER**

██████  
c/o her attorneys:  
Jack Scarola, Esq. and Jack P. Hill, Esq.  
Searcy Denney Scarola Barnhart & Shipley, P.A.  
██  
██

With the assistance of her counsel, Searcy Denney Scarola Barnhart & Shipley, P.A. and Richard Willits, P.A.

2. List the names, business addresses, telephone and cell phone numbers, dates of employment, immediate supervisor (name and address) and rates of pay regarding all employers, including self-employment, for whom you have worked in the past 10 years; this includes listing all sources of income you have received. Answer this question by year, i.e. 1998-2009.

**ANSWER**

**Objection. Irrelevant, immaterial and not reasonably calculated to lead to discovery of admissible evidence.**

3. List all former names and when you were known by those names. State all addresses where you have lived for the past 10 years, the dates you lived at each address, your Social Security number, your date of birth, and, if you are or have ever been married, the name of your spouse or spouses. List any children by name, date of birth and the father's name and address. List the names and address of your parents and any brother or sister.

**ANSWER**

Nickname- ██████████

2 [REDACTED] D  
W [REDACTED]

\_\_\_\_\_

## Rome, Georgia

\_\_\_\_\_

Tallahassee Drive [REDACTED]

[REDACTED] [REDACTED]

**Children:** [REDACTED]

**Father:** [REDACTED]

**Address:** [REDACTED]

**Father:** [REDACTED]

**Address:** [REDACTED]

Parents: [REDACTED] (Father)

**Address Unknown**

(Mother)

**Siblings:** [REDACTED] (Brother)

**(Brother)**

4. Have you ever been convicted of a crime, other than any juvenile adjudication, which under the law under which you were convicted was punishable by death or imprisonment in excess of 1 year, or that involved dishonesty or a false statement regardless of the punishment? If so, state as to each conviction the specific crime and the date and place of conviction.

**ANSWER**

**No**

5. Please provide the name, address, telephone number, place of employment and job title of any person who has, claims to have or whom you believe may have knowledge or information pertaining to any fact alleged in the pleadings (as defined in Federal Rule of Civil Procedure 7(a) filed in this action, or any fact underlying the subject matter of this action).

**ANSWER**

1. ████████  
c/o her attorneys:

Jack Scarola, Esq. and Jack P. Hill, Esq.  
Searcy Denney Scarola Barnhart & Shipley, P.A.

Tel: ██████████

Richard Willits, Esq.  
Richard H. Willits, P.A.

Tel: ██████████

Subject matter: Plaintiff.

2. Jeffrey Epstein  
c/o his attorneys:

Robert Critton, Esquire  
Burman Critton Luttier & Coleman LLP

█  
Tel: █

Jack A. Goldberger, Esquire  
Atterbury, Goldberger & Weiss, P.A.

█  
Tel: █

Bruce E. Reinhart, Esquire  
Bruce E. Reinhart, P.A.

█  
Tel: █

Subject matter: Defendant

3. █'s mother, █, and her brother, █  
c/o █'s attorneys:

Jack Scarola, Esq. and Jack P. Hill, Esq.  
Searcy Denney Scarola Barnhart & Shipley, P.A.

█  
Tel: █

Richard Willits, Esq.  
Richard H. Willits, P.A.

█  
Tel: █

Subject matter: █'s involvement with Epstein.

4. █  
(Address unknown)

Subject matter: Defendant.

██████████. vs. Epstein, et al.  
Case No.: 08-CV-80811-CIV-MARRA/JOHNSON  
Plaintiff's Answers to Defendant's First Interrogatories

5. Jane Doe (Case No.: 1:93-cv-01109-KAM)  
c/o her attorney:

Theodore Leopold, Esquire  
Leopold, Kuvin, P.A.

**Tel:**

**Subject matter:** Victim of Epstein.

6. Jane Doe (Case No.: 502008CA020614)  
c/o her attorney:

**Isidro M. Garcia, Esquire**  
**The Law Office of Brad Edwards & Associates, LLC**

**Tel:**

**Subject matter: Victim of Epstein.**

7. Jane Doe #2 (Case No.: 9:08-cv-80119-KAM)  
c/o her attorney:

**Jeffrey M. Herman, Esquire**  
**Herman & Mermelstein, P.A.**

**Tel:**

**Subject matter:** Victim of Epstein.

8. Jane Doe #3 (Case No.: 9:08-cv-80232-KAM)  
c/o her attorney:

**Jeffrey M. Herman, Esquire**  
**Herman & Mermelstein, P.A.**

**Tel:**

**Subject matter:** Victim of Epstein.

9. Jane Doe #5 (Case No.: 9:08-cv-80381-KAM)  
c/o her attorney:

**Jeffrey M. Herman, Esquire**  
**Herman & Mermelstein, P.A.**

**Tel:**

**Subject matter:** Victim of Epstein.

10. Jane Doe #4 (Case No.: 9:08-cv-80380-KAM)  
c/o her attorney:

**Jeffrey M. Herman, Esquire**  
**Herman & Mermelstein, P.A.**

**Tel:**

**Subject matter:** Victim of Epstein.

11. Jane Doe (Case No.: 9:08-cv-80804-KAM)  
c/o her attorney:

Theodore Leopold, Esquire  
Leopold, Kuvin, P.A.

**Tel:**

**Subject matter:** Victim of Epstein.

12. Jane Doe #7 (Case No.: 9:08-cv-80993-KAM)  
c/o her attorney:

**Jeffrey M. Herman, Esquire**  
**Herman & Mermelstein, P.A.**

██████ vs. Epstein, et al.

Case No.: 08-CV-80811-CIV-

### Plaintiff's Answers to Defendant's First Interrogatories

**Tel:**

**Subject matter: Victim of Epstein.**

13. [REDACTED] (Case No.: 502008CA025129XXXXMB Al  
c/o her attorneys:

**Jack Scarola, Esquire**

**Jack P. Hill, Esquire**

**Searcy Denney Scarola Barnhart & Shipley, P.A.**

**Tel:**

**Subject matter:** Victim of Epstein.

14. [REDACTED]  
(Address unknown at this time)

**Subject matter:**

15. **Janusa Banasiack**  
**Palm Beach Police Department**

**Tel:**

**Subject matter:** Investigator.

16. **Lanaa Belohavek**  
**Palm Beach County Prosecutors Office**  
**401 North Dixie Highway**

**Tel:**

**Subject matter:** Prosecutor.

17. Detective [REDACTED], lead investigator



██████, vs. Epstein, et al.

Case No.: 08-CV-80811-CIV-MARRA/JOHNSON

Plaintiff's Answers to Defendant's First Interrogatories

**Palm Beach Police Department**

████████████████████  
████████████████████

Tel: ██████████

Subject matter: Investigator.

18.

████████████████████  
████████████████████  
████████████████████

Subject matter: Former boyfriend of a victim of Epstein.

19.

Sgt. ██████  
Palm Beach Police Department

████████████████████  
████████████████████

Tel: ██████████

Subject matter: Investigator.

20.

████████████████████  
████████████████████  
████████████████████

Subject matter: Plaintiff's former boyfriend.

21.

██████████, supervisor  
Sanitation Bureau of the Town of Palm Beach

████████████████████  
████████████████████  
████████████████████

Subject matter: The incident which is the subject matter  
of this lawsuit. Discovery is ongoing.

22.

Major ██████  
████████████████████  
████████████████████  
████████████████████  
████████████████████  
████████████████████

Subject matter: Investigator.

23. █████, friend of █████  
(Address will be provided upon receipt)

Subject matter: Victim and friend of █████.

24. Ghislane Maxwell c/o Ghislane Corp.  
████████████████████

Subject matter: Associate of Epstein.

25. █████  
Parent Child Center  
████████████████████

Subject matter: Counselor at Parent Child Center.

26. Detective █████ █████  
Palm Beach Police Department  
████████████████████  
Tel: ██████████

Subject matter: Investigator.

27. Chief █████  
Palm Beach Police Department  
████████████████████  
Tel: ██████████

Subject matter: Investigator.

28. █████  
(Address unknown at this time)

Subject matter: Associate of Epstein who facilitated introductions  
with various victims.

29. ██████████  
(Address unknown at this time)  
  
Subject matter: Employee of Epstein.

30. Detective ██████████  
Palm Beach Police Department  
██████████  
Tel: ██████████  
  
Subject matter: Investigator

31. ██████████  
██████████  
██████████  
██████████  
██████████  
Tel: ██████████  
  
Subject matter: Federal prosecutor.

32. ██████████  
██████████  
██████████  
██████████  
  
Subject matter: Investigator.

33. ██████████  
Address will be provided upon receipt  
West Palm Beach  
  
Subject matter: ██████████'s physician.

34. ██████████  
██████████  
██████████  
██████████

Tel: ██████████

Subject matter: Federal prosecutor.

35. ████████ friend of ████████ mother  
(Address will be provided upon receipt)

Subject matter: Friend of ████████ mother.

36. ████████ friend of ████████'s mother  
(Address will be provided upon receipt)

Subject matter: Friend of ████████'s mother

37. ████████ friend of ████████  
(Address will be provided upon receipt)

Subject matter: Potential victim and friend of ████████

38. ████████████████████  
(Address unknown at this time)

Subject matter: Associate of Epstein who may have been involved  
in encounters between Epstein and ████████

6. Please state the specific nature and substance of the knowledge that you believe the person(s) identified in your response to interrogatory no. 5 may have.

**ANSWER**

Please see answer to Interrogatory #5

7. Were you suffering from physical infirmity, disability, disease, sickness, or psychiatric/psychological condition at the time of the incident(s) described in the complaint? If so, what was the nature of the infirmity, disability, or sickness?

**ANSWER**

**School behavioral problems, received counseling prior to the incident.**

8. Did you consume any alcoholic beverages or take any drugs or medications within 12 hours before the time of each incident(s) described in the complaint? If so, state the type and amount of alcoholic beverages, drugs, or medication which were consumed, and when (dates) and where you consumed them.

**ANSWER**

1. On one occasion I had taken "Morning Glory" and "Angel Trumpets". I do not recall the date.
  2. On another occasion I used cocaine powder. I do not recall the date.
9. Describe each injury (physical, emotional, mental) for which you are claiming damages in this case, specifying the part of your body that was injured, the nature of the injury and as to any injuries you contend are permanent, the effects on you that you claim are permanent.

**ANSWER**

10. Please state each item of damage that you claim, and include in your answer: the count to which the item of damages relates; the factual basis for each item of damages; and an explanation of how you computed each item of damages, including any mathematical formula used.

**ANSWER**

I am claiming compensation for mental anguish, mental pain, psychic trauma, and loss of enjoyment of life. These damages will be evaluated by a jury who will provide their own methods of computation in an amount of at least the statutory minimum established by 18 U.S.C.A. § 2255.

**Discovery is ongoing.**

11. List the names and business addresses of each physician (including psychiatrist, psychologist, chiropractor or medical provider) who has treated or examined you,

and each medical facility where you have received any treatment or examination for the injuries for which you seek damages in this case; and state as to each the date of treatment or examination and the injury or condition for which you were examined or treated.

**ANSWER**

████████████████████  
████████████████████  
████████████████████

Date: I do not recall the date. I would defer to the Doctor's records.

████████████████████ (Counselor/Therapist) Date: Since high school. Ongoing.  
Parent Child Center  
████████████████████

12. List the names and business addresses of all other physicians, medical facilities, rehab facilities (drug, alcohol or psychiatric) or other health care providers including psychiatrist, psychologist, mental health counselor and chiropractors by whom or at which you have been examined or treated in the past 10 years; and state as to each the dates of examination or treatment and the condition or injury for which you were examined or treated.

**ANSWER**

██  
██  
██

██  
██  
██

██  
Ob/Gyn  
██  
██

██, DDS  
Dentist

**Fid. Sifts**

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

**AD Wellness Cont.**

- ANSWER**

**ANSWER**

**ANSWER**

From May or June of 2002 to August of 2003 I went to Mr. Epstein's home on average 2 times a week. There were weeks when I would go 4 times a week. All my visit dates were maintained by Jeffrey Epstein and his staff in a phone message book kept on a table by the phone in the kitchen.

Discovery is ongoing.

16. State in detail how you came to be at Mr. Epstein's home on each occasion, i.e. did someone bring you or ask you if you would or wanted to go; if so, state the name and address of that individual and what he/she told you and the purpose of your visit.

**ANSWER**

I was introduced to Jeffrey Epstein by my friend ████████ in 2002. I was to give Jeffrey Epstein a massage. I continued to provide massages up until August of 2003. I was transported to Jeffrey Epstein's house by Yellow Cab, provided by Jeffrey Epstein, ████████, my ex-boyfriend ████████, my mother ████████ and my brother ████████.

██████  
(Address will be provided upon receipt)

17. State the amount of monies (or anything else of value, including gifts) you claim were given or paid to you by Mr. Epstein (or someone paid/gave you on his behalf and that person's name, address and phone number) by year from 2000-2006.

**ANSWER**

\$200-\$300 for a massage session at an average of 2 sessions a week from May or June of 2002 to August 2003.

\$500 for a photo taken by ████████ at Jeffrey Epstein's house

Paid for taxi cabs

Concert tickets-Incubus, delivered by two girls at the concert

Clothes and lingerie sent by FedEx

Book-Massage for Dummies

CD

Flowers

Express gift card



18. List separately the names, addresses and phone numbers of all males, excluding Mr. Epstein, with whom you have had sexual activity since age 10 (by year) up through your current age. Describe the nature of sexual activity, the date(s) and whether you received money or other consideration from the person.

**ANSWER**

**Objection. Relevance and overbroad.**

19. List separately the names, addresses and phone numbers of all males, excluding your claims against Mr. Epstein, whom you have claimed (formally or informally) committed sexual assault or battery on you since age 10 (by year) up through your current age. Describe the nature of sexual assault or battery, the date(s) and whether you received money or other consideration from the person.

**ANSWER**

**None.**

20. State the names, addresses and phone numbers of all males, excluding your claims against Mr. Epstein, whom you have claimed (formally or informally) committed lewd or lascivious conduct to you since age 10 (by year) up through your current age. Describe the lewd or lascivious conduct, the date and whether you received money or other consideration from the person.

**ANSWER**

**None**

21. State the names, addresses and phone numbers of all males, excluding your claims against Mr. Epstein, whom you have claimed (formally or informally) committed lewd or lascivious exhibition to you since age 10 (by year) up through your current age. Describe the lewd or lascivious exhibition, the date and whether you received money or other consideration from the person

**ANSWER**

**None**

22. List in detail all discussions/interviews which you had with any representative

from FBI, U.S. Attorneys' Office, State Attorneys' Office (Palm Beach County), Palm Beach Sheriff's Office and Palm Beach Police Department regarding your meetings with Mr. Epstein. Include dates, who was present, the details of what was discussed, whether a court reporter was present and whether a taped statement was taken or whether you provided a written statement.

**ANSWER**

**I was interviewed by the FBI and a State Attorney, they have my statement.**

23. State the names, addresses, ages, phone numbers and dates of all females whom you claim were brought by you to Mr. Epstein's home to give him a massage or for any other reason. As to each female, state the amount of money you claim you were paid to bring each female.

**ANSWER**

██████. Age: 22  
West Palm Beach, FL.  
I was paid \$100.00

24. Please list each time you were interviewed by any state or federal law enforcement agent or prosecutor, who was present, whether notes were taken, and what you recall saying to them.

**ANSWER**

**I do not recall who interviewed me. This information would be available in the FBI and Prosecutors office. They took notes and I was not provided with a copy of those notes.**

25. Please describe any statements made to you by any federal or state law enforcement agent or prosecutor regarding the availability of civil remedies against Mr. Epstein and regarding whether there would be any benefit from your voluntary cooperation with law enforcement.

**ANSWER**

**None**


██████ vs. Epstein, et al.  
Case No.: 08-CV-80811-CIV-██████  
Plaintiff's Answers to Defendant's First Interrogatories

██  
Signature of Answering Party

STATE OF Florida )

COUNTY OF Palm Beach )

The foregoing instrument was acknowledged before me this 17 day of February, 2009  
by ██████████ who is personally known to me or who has produced  
\_\_\_\_\_ (type of identification) as identification and who did/did  
not take an oath.

  
\_\_\_\_\_  
Notary Public  
State of Florida at Large  
My Commission expires:  
Commission No:



[REDACTED] vs. Epstein, et al.  
Case No.: 08-CV-80811-CIV-[REDACTED]  
Plaintiff's Answers to Defendant's First Interrogatories

COUNSEL LIST

Jack A. Goldberger  
Atterbury, Goldberger & Weiss, P.A.

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