IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually, BRADLEY J. EDWARDS, individually,

Defendants.

_____/

Complex Litigation, Fla. R. Civ. Pro. 1201

Case No. 50 2009 CA 040800XXXXMBAG

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PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S AMENDED MOTION FOR A PROTECTIVE ORDER TO PRECLUDE OPPOSING COUNSEL AND DEFENDANT/COUNTER-PLAINTIFF FROM MAKING EXTRAJUDICIAL STATEMENTS AND COMMENTARY TO THE MEDIA AND PRESS, WITH INCORPORATED LEGAL AUTHORITIES

Plaintiff/Counter-Defendant, JEFFREY EPSTEIN ("Epstein"), by and through his undersigned counsel and pursuant to Rule 1.280(c) of the Florida Rules of Civil Procedure, files this Amended Motion for a Protective Order to Preclude Opposing Counsel and Defendant/Counter-Plaintiff From Making Extrajudicial Statements and Commentary to the Media and Press as set forth below, and states:

1. In an article posted on www.palmbeachdailynews.com on October 15, 2010, entitled "Claim: Epstein Filed Lawsuit to 'Intimidate' Attorney Edwards Prosecuting Sex Abuse Cases," Jack Scarola, Esq., counsel for the Defendant/Counter-Plaintiff, Bradley J. Edwards, was quoted as stating: 1) "The sole motivation for these claims against Mr. Edwards is an attempt to intimidate him so as to abandon the justified prosecution of his claims against Mr. Epstein"; and 2) "This constitutes a very substantial cloud over Mr. Edwards' head." (Exhibit 1).

2. In an article appearing on www.palmbeachdailynews.com, posted February 28, 2011, and updated March 1, 2011, entitled "Jeffrey Epstein Introduced Woman to Prince Andrew, She Tells London 'Daily Mail'," Mr. Edwards is quoted as saying: "I feel terrible for Virginia and all of the other girls that were sexually abused, but I was not surprised at all by the story." Edwards also said. "I represented several girls that, similar to Virginia, were very young and vulnerable and were badly abused by Epstein. These girls will never completely heal from what they went through. What is most troublesome though is that these serious crimes went virtually unpunished. I currently represent several victims that want Epstein prosecuted for the crimes he committed against them, which is why we filed a claim under the Crime Victim's Rights Act in an effort to overturn the illegal plea deal and get true justice for these victims." (Exhibit 2).

3. On March 8, 2011, the BARD Marketing firm issued a press release on behalf of Mr. Edwards' current law firm, Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L., which stated that Mr. Edwards "successfully represented" ten women between 12 and 15 years old "by *proving* that Epstein and his international sex trafficking criminal enterprise exploited them and hundreds of other underage girls." (Exhibit 3) (emphasis added). The press release quotes Mr. Edwards as stating *inter alia* that "we took on powerful people and sought to level the playing field to protect victims" and that the media attention will hopefully "inspire victims to report these crimes." (*Id.*).

4. On March 11, 2011, the British publication "The Telegraph" published an article entitled "Convicted Paedophile Jeffrey Epstein is Facing a New Criminal Investigation and is Involved in a Civil Suit with a Lawyer." (Exhibit 4). The source for much of that article's information is Mr. Scarola, who is quoted to have said the following (*Id.*):

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a. "We would be very keen to speak with Prince Andrew, given his relationship with Jeffrey Epstein."

b. "We want to obtain additional details on the scope of Mr. Epstein's alleged sexual abuse of children — when, where, how frequently and the extent to which it involved the transport of children inside and outside the United States for sex."

c. "We have reason to believe that Prince Andrew has been in the company of Mr. Epstein while Mr. Epstein has been in the company of under-aged children."

5. On March 11, 2011 the Palm Beach Daily News published an article entitled "Jeffrey Epstein Address Book 'Holy Grail' of Famous Names." (Exhibit 5). This article refers to the fact that "[t]he British press has been having a field day digging up new details about Epstein's friendship with Prince Andrew." (*Id.*).

6. Two days later, another British publication, "The Observer," reported: "Edwards' lawyer, Jack Scarola, said last week that his team intended to try and get a statement from the prince [Andrew] about what he may or may not have seen while attending parties with Epstein." (Exhibit 6).

7. An article published in the "Independent" on March 13, 2011 reported that Mr. Scarola said: "We are in the process of scheduling a further deposition of Mr. Epstein at which we intend to question him regarding the details of his child abuse, including all circumstances in which he may have been involved in procuring sexual favours from minors for his high-profile friends." (Exhibit 7).

8. Again, on March 17, 2011, the BARD Marketing firm, on behalf of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L., issued a press release entitled "Victims of Sexual Abuse Demand Justice." (Exhibit 8). The press release states that "Edwards *proved* that Epstein

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and his international sex trafficking criminal enterprise exploited them and hundreds of other underage girls." (*Id.*) (emphasis added).

9. The Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. website, www.pathtojustice.com, also issues press releases and links online articles relating to Mr. Epstein and the lawsuits. These press releases are titled: 1) "Brad Edwards Files Motion in Jeffrey Epstein Case – Violation of Crime Victim's Rights Act," (March, 2011); 2) "London Papers Quote Edwards in Recent Jeffrey Epstein / Prince Andrew Scandal" (March, 2011); and 3) "Edwards Prevails on Key Rulings in Epstein Case" (May, 2010). (Exhibit 9).

10. Moreover, the Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. Facebook Fan page, http://www.facebook.com/#!/FarmerJaffeWeissing, refers to Mr. Epstein as a "billionaire pedophile" and that "Edwards helped 10 women seek justice, who were sexually molested and abused by Epstein." (Exhibit 10).

11. At a hearing before this Court on March 31, 2011, Mr. Scarola repeatedly labeled Mr. Epstein a "pedophile." (Exhibit 11).

12. Mr. Edwards and his attorneys should not be permitted to wage a media campaign against Mr. Epstein, taint the jury pool, and pre-try their case in the court of world opinion. Accordingly, all statements and comments by Mr. Scarola and Mr. Edwards to the press and media regarding Mr. Epstein's alleged sexual abuse of underage women -- other than what appears in the public record -- should be barred by the Court.

13. Undeniably, this Court has the discretion to control and prohibit such extrajudicial commentary and pretrial publicity in order to insure that Mr. Epstein receives a fair trial. *See Sheppard v. Maxwell*, 384 U.S. 333, 348, 86 S. Ct. 1507, 16 L. Ed. 2d 600 (1966); *State ex. rel. Miami Herald Publishing Co. v. McIntosh*, 340 So. 2d 904, 910 (Fla. 1976); *Sentinel Commc'n*

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Co. v. Watson, 615 So. 2d 768, 769 (Fla. 5th DCA 1993). The limitations imposed by a court on communications between lawyers and/or litigants and the media are permissible for good cause shown in order to assure a fair trial. *See McIntosh*, 340 So. 2d at 910; *Florida Freedom Newspapers, Inc. v. McCrary*, 520 So. 2d 32, 35 (Fla. 1988) (there is no constitutional impediment to a court prohibiting counsel from making prejudicial statements that are intended for publication).

14. The Florida Supreme Court in *McIntosh*, 340 So. 2d at 910, recognized that restrictions on extrajudicial comment are within the power of the trial judge:

> Limitation placed on lawyers, litigants and officials directly affected by court proceedings may be made at the court's discretion.... Muzzling lawyers who may wish to make public statements ... has long been recognized as within the court's inherent power to control professional conduct.

The Florida Supreme Court later stated: "Prohibition on comment is an acceptable alternative to prior restraint." *McCrary*, 520 So. 2d at 35-36 (order prohibiting public comment on evidence and charges against two defendants by members of state attorney's office and sheriff's office was proper preventive measure where prejudicial publicity threatened to impair the right to a fair trial).

15. Communications by Mr. Scarola and Mr. Edwards, as attorneys and officers of the court, with the media and press are also limited by the requirements of Rule 4-3.6 of the Rules Regulating The Florida Bar Rule 4-3.6, entitled "Trial Publicity":

> (a) Prejudicial Extrajudicial Statements Prohibited. A lawyer shall not make an extrajudicial statement that a reasonable person would expect to be disseminated by means of public communication if the lawyer knows or reasonably should know that it will have a substantial likelihood of materially prejudicing an adjudicative proceeding due to its

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> creation of an imminent and substantial detrimental effect on that proceeding.
>
> (b) Statements of Third Parties. A lawyer shall not counsel or assist another person to make such a statement. Counsel shall exercise reasonable care to prevent investigators, employees, or other persons assisting in or associated with a case from making extrajudicial statements that are prohibited under this rule."

16. Florida Bar Rule 4-3.6 incorporates the "substantial likelihood of material prejudice" standard that the United States Supreme Court found to be a "constitutionally permissible balance between the First Amendment rights of attorneys in pending cases and the state's interest in fair trials." *Gentile v. State Bar of Nevada*, 501 U.S. 1030, 1075, 111 S. Ct. 2720, 2745, 115 L. Ed. 2d 888 (1991).

17. The foregoing authorities make perfectly clear that in appropriate cases extrajudicial statements can and should be prohibited. *See also Rodriguez v. Feinstein*, 734 So. 2d 1162, 1164-65 (Fla. 3d DCA 1999) (proper for a court to determine on a case-by-case basis whether good cause is shown to impose limitations on communications between counsel and the media). This is an exceedingly appropriate case for prohibiting extrajudicial statements because the ongoing media blitz by Mr. Edwards and Mr. Scarola is substantially likely to prejudice the pending litigation. Indeed, their extrajudicial commentary is unquestionably intended to -- and will -- poison the jury pool against Mr. Epstein. Indeed, their carefully-crafted media campaign against Mr. Epstein is designed to incite the public and muddy the water.[1]

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[1] In a letter of March 18, 2011, in an effort to conserve this Court's time and resources, undersigned counsel requested that Mr. Scarola enter into a written agreement guaranteeing that Mr. Scarola, Mr. Edwards, and their respective agents and employees will not engage in any extrajudicial commentary concerning Mr. Epstein's alleged sexual abuse of or involvement with minor females. The undersigned's efforts have not, unfortunately, been successful. An e-mail

18. There is no merit to any argument by Mr. Scarola and/or Mr. Edwards that their statements to the media were justified because they were merely responding to statements to the media by an "Australian victim;" that they informed the public of a threat to public safety; and they encouraged other victims to come forward. These purported justifications are frivolous.

19. Instead of simply responding "no comment," defense counsel capitalized on the opportunity to speak extensively to the press regarding matters which can only serve to inflame a potential jury pool and thereby prejudice Mr. Epstein. They were intended to, and did, make sensational tabloid headlines. Moreover, at least one extrajudicial statement was made *prior* to the media frenzy surrounding Ms. Roberts.

20. The extrajudicial statements of Mr. Scarola are not intended to serve the public good, but, rather, to put pressure on Mr. Epstein by implicating his alleged acquaintances. This is precisely the sort of pretrial publicity that Florida Bar Rule 4-3.6 is designed to preclude.

21. Mr. Edwards' and Mr. Scarola's repeated attempts to poison the well are exacerbated by the publication of *patently false* statements by Mr. Edwards' present law firm. Press releases issued on behalf of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L., by its public relations firm include categorically *false* statements that Mr. Edwards "**proved** that Epstein and his international sex trafficking criminal enterprise exploited" "ten women . . . between 12 and 15 years of age" and "hundreds of other underage girls." (Exhibit 8) (emphasis added). Mr. Edwards has not *proven* anything of the sort. The foregoing statements are blatant misrepresentations that must be stopped.

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response to the above March 18, 2011 letter was received on March 21, 2011 rejecting the request.

22. The media attacks on Mr. Epstein fueled by Mr. Scarola and/or Mr. Edwards have far-reaching ramifications, and create an "imminent and detrimental" effect on the subject litigation. The technological advancements of the 21st century result in the immediate dissemination of comments by counsel to the press. Most, if not all, of the cases cited by Defendants predate the "World Wide Web." In this day and age of the internet, on-line newspapers, blogs and search-engines like Google and Yahoo, a search of Plaintiff Epstein's name on the Internet will instantaneously reveal any and all pretrial publicity regarding Epstein and all matters relating to these proceedings. These search results will include the most recent as well as older postings. Unlike the days of old when newspapers were the primary source of information and their content was largely forgotten and not readily accessible once thrown in the garbage can, the information on the Internet is always available and easily revisited. Whatever appears now in the press and Internet will continue to generate comment in the press and Internet until the time of trial.

23. In view of prejudicial media frenzy fueled by Mr. Scarola and Mr. Edwards, Mr. Epstein requests the entry of a narrowly - drawn limitation barring them from making extrajudicial statements concerning Mr. Epstein's alleged sexual abuse of, or involvement with, underage women other than what appears in the public record. Specifically, Plaintiff proposes the entry of an Order incorporating the following provisions:

1. No person covered by this order shall make any statement to members of any television, radio, newspaper, magazine, internet (including, but not limited to, bloggers), or other media organization about this case, other than matters of public record, that could interfere with a fair trial or otherwise prejudice the parties or the administration of justice;

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2. Nothing set forth in paragraph 1 shall prohibit the parties in this action or their counsel

(a) Stating, without elaboration or any kind of characterization whatsoever:

(i) the general nature of an allegation or defense made in this case;

(ii) information contained in the public record of this case;

(iii) scheduling information;

(iv) any decision made or order issued by the court which is a matter of public record.

(b) Explaining, without any elaboration or any kind of characterization whatsoever, the contents or substance of any motion or step in the proceedings, to the extent such motion or step is a matter of public record in this case and any ruling made thereon to the extent that such ruling is a matter of public record.

The Plaintiff requests to grant further protection so that such matters do not become public record for prejudicial extrajudicial statements. The Plaintiff further requests that the court require the Defendant and his counsel to establish good cause in the advance of any filing with such references and advance of any statements for the media.

24. In addition, Mr. Scarola should be prohibited from labeling Mr. Epstein in open court as a "pedophile," as he has done. (*See* Exhibit 10). By using the epithet in open court, it becomes part of the public record and fodder for the media. Pursuant to Fla. R. Evid. 404, Mr. Scarola could not use such an epithet during the trial or introduce evidence to support the disparaging characterizations.

25. The extrajudicial statements by Mr. Scarola and Mr. Edwards throw roadblocks in the "path to justice" and should not be permitted.

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WHEREFORE, Plaintiff/Counter-Defendant, JEFFREY EPSTEIN, respectfully requests that the Court grant his Amended Motion for a Protective Order to Preclude Opposing Counsel and Defendant/Counter-Plaintiff from Making Extrajudicial Statements and Commentary to the Media and Press, and grant such other and further relief as is deemed necessary and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via e-mail and U.S. Mail this 24 day of May, 2011 to:

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PalmBeachDailyNews.com
THE SHINY SHEET

Claim: Epstein filed lawsuit to 'intimidate' attorney Edwards prosecuting sex abuse cases

By **MICHELE DARGAN**
DAILY NEWS STAFF WRITER

Updated: 8:21 p.m. Friday, Oct. 15, 2010
Posted: 8:04 p.m. Friday, Oct. 15, 2010

Billionaire sex offender Jeffrey Epstein filed his 2009 lawsuit against attorney Brad Edwards in an effort to get Edwards to drop sex abuse lawsuits filed against Epstein, attorney Jack Scarola said Friday.

"The sole motivation for these claims against Mr. Edwards is an attempt to intimidate him so as to abandon the justified prosecution of his claims against Mr. Epstein," Scarola said.

Edwards secured deals for victims L.M., E.W. and Jane Doe, who were among nearly two dozen young women who received confidential settlements from Epstein. Edwards filed a new lawsuit last month against Epstein on behalf of victim M.J., asking for $50 million in damages.

At a court hearing Friday, Scarola told Circuit Judge David Crow that all lawsuits were settled for "very substantial sums of money, which is directly contrary to the assertions that Mr. Epstein made that these cases were fabrications."

The hearing was related to Epstein's lawsuit against Edwards, alleging Edwards was involved in false claims made by Ponzi schemer Scott Rothstein. Epstein says Rothstein lured investors to his scheme by telling them Epstein had agreed to settle sex abuse lawsuits for as much as $200 million. Edwards worked at Rothstein's firm for less than a year; Rothstein is named as a defendant.

Speaking on behalf of Epstein, attorney Joseph Ackerman said, "Except in certain cases, we believe the Rothstein firm was marketing cases that didn't exist, not necessarily the ones he settled. We believe actions were taken in those cases that were an abuse of process to inflate the marketing."

Edwards filed a counterclaim, alleging Epstein filed a frivolous lawsuit to get him to back down from representing the victims.

Epstein had filed a complaint with the Florida Bar against Edwards, raising allegations that Edwards and others were involved in Rothstein's wrongdoing. After investigating the claim, the Florida Bar dismissed the complaint. In July, Edwards received a letter from the U.S. Attorney's Office — the office responsible for prosecuting Rothstein — identifying Edwards as a potential victim of Rothstein.

Scarola wants the judge to sever the cases and fast-track Edwards' case.

"This constitutes a very substantial cloud over Mr. Edwards' head," Scarola said.

"Public allegations have been made against him that he was a participant in this major fraud, one of the largest in the history of South Florida, and we want, expeditiously, to have that cloud removed."

Epstein, 57, finished serving his one-year probation in July on state charges of soliciting prostitution and soliciting a minor for prostitution. More than two dozen underage girls were identified in federal documents as having been sexually abused by Epstein.

A secret deal with federal prosecutors revealed Epstein could have been charged with multiple federal counts of sexual exploitation of minors, resulting in much harsher penalties. But the feds deferred to two state charges that got him an 18-month sentence. He served only 13 months in a vacant wing at the Palm Beach County Stockade.

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EXHIBIT 1

In more than 62 pages of court documents, Scarola asserts the court should rule in Edwards' favor for at least two reasons: that Epstein has elected to invoke his Fifth Amendment privilege in depositions, and Epstein's claims are unsupported and contradicted by the evidence.

"Under the well-established 'sword and shield' doctrine, Epstein cannot seek damages from Edwards while at the same time asserting a Fifth Amendment privilege to block relevant discovery," Scarola wrote in court papers.

"Epstein's deposition was taken at least five times," court papers say. "During all of these depositions, Epstein refused to answer any substantive questions about his sexual abuse of minor girls."

Ackerman said the Rothstein lawsuit is a different situation than Epstein taking the Fifth in depositions regarding the victims, because the allegations against Rothstein and Edwards "took place outside of Epstein's personal knowledge.

"This is not a case where Mr. Epstein has personal knowledge of what happened at the Rothstein firm in regard to these claims," Ackerman said. "These investors went to the Rothstein firm and were shown case files for the L.M. litigation against our client for the purpose of putting investments in. The complaint is not based on whether our client is guilty or not guilty for the crimes for which he settled or pled guilty to. What he has said in the complaint is they took the cases against me ... to attempt to inflate the value for the purpose of the investment."

Scarola told Crow that Epstein has refused to answer any questions regarding his basis for claims against Edwards.

"We have undertaken not only to demonstrate absence of any evidence to support any claims that have been made against Mr. Edwards, but to affirmatively and conclusively demonstrate his complete and total innocence with respect to these matters," Scarola said.

Find this article at:

http://www.palmbeachdailynews.com/news/claim-epstein-filed-lawsuit-to-intimidate-attorney-edwards-974565.html

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PalmBeachDailyNews.com
THE SHIRT SHEET

Jeffrey Epstein introduced woman to Prince Andrew, she tells London 'Daily Mail'

By **MICHELE DARGAN**
DAILY NEWS STAFF WRITER

Updated: 9:04 a.m. Tuesday, March 1, 2011
Posted: 7:12 p.m. Monday, February 28, 2011

The young woman previously known as Jane Doe 102 has gone public, detailing her life from age 15 as a paid sex slave for Jeffrey Epstein and his friends.

Now a married 27-year-old mother of three living in Australia, Virginia Roberts spoke at length to London's Daily Mail in an interview published Sunday.

Roberts spoke to the Mail after a photo recently surfaced of Epstein and Britain's Prince Andrew walking in Central Park. The photo was taken when the prince visited Epstein's Manhattan apartment in December.

Roberts reveals to the Mail that she was in Prince Andrew's company three times at the behest of Epstein. An old photo, printed in the Mail, shows a smiling Andrew with his arm around Roberts' waist. The photo was taken at the London home of Epstein pal Ghislaine Maxwell.

"There 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," the Mail said.

On that trip, which also included stops in Paris, Spain, Granada and Tangier, Roberts said Epstein paid her $15,000.

Epstein, 58, received an 18-month sentence on state charges of soliciting a minor for prostitution and soliciting prostitution. He is now a lifelong registered sex offender.

A deal with federal prosecutors revealed Epstein could have been charged with multiple federal counts of sexual exploitation of minors, resulting in much harsher penalties. But the feds deferred to the two state charges.

Serving 13 months segregated in a vacant wing of the county stockade, Epstein was let out on work release six days a week for up to 16 hours a day. In addition, probation records reveal that while serving one year of house arrest, Epstein was given permission to travel out of state and spend hours outside his house, all with the blessing of either the court or his probation officer. Epstein retained some of the best lawyers in the country to get what many have described as a sweetheart deal.

In December 2009, Roberts filed a lawsuit against Epstein as Jane Doe 102. She was one of nearly two dozen women who settled lawsuits against Epstein for undisclosed amounts, all alleging they were sexually abused by him as minors. The lawsuit says Maxwell recruited Roberts at The Mar-A-Lago Club, where Roberts was working as a changing room assistant. Maxwell told Roberts she could earn big money as a "traveling masseuse" to a wealthy Palm Beach man.

All the lawsuits against the billionaire money manager said his modus operandi in the initial visit was the same: the minor girl was taken to Epstein's mansion on El Brillo Way and led upstairs to a spa room by one of Epstein's assistants, where he would ask the girl to perform massages and/or various sex acts, for which he would pay her.

Roberts' lawsuit said she was sexually exploited by Epstein's adult male peers, which included royalty, politicians, academicians, businessmen and others in various locations around the world.

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EXHIBIT
2

Epstein attorney Joseph Ackerman did not return a call for comment.

Roberts — who spent four years with Epstein — refers to him as "a monster" who paid her lavishly to satisfy his and his friends sexual whims — although Roberts doesn't identify the friends.

Roberts says she would meet one of Epstein's friends on his private island in the Caribbean or at his ranch in New Mexico, both of which were isolated, and she was "given to men ranging in age from their 40s to their 60s."

To detach herself from reality, Roberts said, she began taking Xanax — "up to eight pills a day."

Other revelations by Roberts in the Mail: Epstein and Maxwell told her they wanted her to have his child. That, she told the Mail, was "a wake-up call" to get out of the situation.

Fort Lauderdale attorney Brad Edwards has represented several of Epstein's underage victims. In addition, Epstein and Edwards have filed lawsuits against each other. Epstein alleges Edwards was involved in false claims made by Ponzi schemer Scott Rothstein, while Edwards alleges Epstein filed a frivolous lawsuit to get him to back down from representing the victims.

"I feel terrible for Virginia and all of the other girls that were sexually abused, but I was not surprised at all by the story," Edwards said. "I represented several girls that, similar to Virginia, were very young and vulnerable and were badly abused by Epstein. These girls will never completely heal from what they went through. What is most troublesome though is that these serious crimes went virtually unpunished. I currently represent several victims that want Epstein prosecuted for the crimes he committed against them, which is why we filed a claim under the Crime Victim's Rights Act in an effort to overturn the illegal plea deal and get true justice for these victims."

Find this article at:

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News Reports about Billionaire Pedophile Jeffrey Epstein Highlight the Importance of Victims Rights

Hundreds of news articles have reported billionaire pedophile Jeffrey Epstein's close relationship with Britain's Prince Andrew. Attorney Brad Edwards has pursued victim rights cases on behalf of ten women who were sexually molested by Epstein.

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Fort Lauderdale, FL -- In the last week, hundreds of news articles have reported billionaire pedophile Jeffrey Epstein's close relationship with Britain's Prince Andrew. Attorney Brad Edwards has pursued victim rights cases on behalf of ten women who, between 12 and 15 years of age, were sexually molested and abused by Epstein. The stories of their abuse have all the trappings of a Hollywood movie, including posh settings

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www.LivingSocial.com

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Employment screening tool. Help prevent child molestation.
dianascreen.com

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EXHIBIT 3

at Epstein's Palm Beach Mansion, private Caribbean island and his jet. But Epstein's heinous sexual abuse of these victims is no fiction.

Edwards successfully represented these women, obtaining justice for each of them, by proving that Epstein and his international sex trafficking criminal enterprise exploited them and hundreds of other underage girls.

This recent wave of news coverage highlight the importance of the victims rights work that Attorney Edwards does on behalf of victims of sexual molestation and other sexual abuse. Edwards conducts extensive investigations and pursues civil lawsuits against sexual predators to protect the rights of his victim clients and to hold sexual predators, like Epstein, accountable.

Many sexual predators, like Epstein, are wealthy and powerful and able to focus vast resources and high profile legal teams in an attempt to deflect attention, avoid criminal liability, and deny justice to their victims. Speaking of his work on the Epstein cases, Edwards says "we took on powerful people and sought to level the playing field to protect victims."

Representing these women has made Edwards aware that child sexual abuse is extremely prevalent. According to a U.S. Health and Human Services study, more than 83,000 substantiated reports of sexually abused children were made in 2005 alone. The actual number of incidents of sexual abuse is likely much higher because it is believed that sexual abuse, especially amongst children, is significantly underreported.

Edwards hopes that the media attention focused on Epstein's sexual abuse will "inspire victims to report these crimes" and will convey his belief "that victims rights cases can effectively protect their rights, maintain their anonymity, and hold predators accountable."

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L., a Fort Lauderdale Litigation firm, focuses on Consumer Class Actions, Sexual Abuse Cases as well as other significant Personal Injury, Wrongful Death, and Whistleblower Suits (qui tam). The firm is headquartered at 425 N. Andrews Avenue, Suite 2, Fort

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Lauderdale, Florida 33301 and may be reached at (800) 400-1098 or (954) 524-2820. Additional information about Brad Edwards or Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. may be obtained from the firm's website at www.pathtojustice.com.

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The Telegraph

Convicted paedophile Jeffrey Epstein is facing a new criminal investigation and is involved in a civil suit with a lawyer

The Duke of York could be asked to give evidence in two separate legal cases involving Jeffrey Epstein, his paedophile friend, The Daily Telegraph has learnt.



Jeffrey Epstein and Ghislaine Maxwell stayed at Sandringham as guests of the Duke Photo: ALBANPIX/GEOFF PUGH



By Jon Swaine (http://www.telegraph.co.uk/journalists/jon-swaine/) , In Palm Beach, Florida
10:00PM GMT 10 Mar 2011
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Lawyers for a Florida attorney who is being sued by Epstein have disclosed that they want to take a statement from the Duke because they believe he may be able to shed fresh light on Epstein's alleged sex offences.

Meanwhile the FBI has indicated that it will reopen its criminal investigation into Epstein after receiving new information. He was convicted in 2008 for soliciting an under-age girl for prostitution. Sources in America have said the FBI could ask the Duke to give evidence as part of the new investigation.

Epstein, 58, was sentenced to 18 months in prison after admitting two sex offences as part of a plea bargain deal. But allegations were made against him by as many as 40 girls, of whom 17 have settled civil claims they brought against the billionaire.

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EXHIBIT 4

Epstein is himself suing Brad Edwards, a lawyer for several of the girls. Epstein alleges that Mr Edwards was linked to a fraud committed by a former colleague — a claim dismissed by the local bar association — and that his clients' cases against Epstein were therefore invalid.

Princess Beatrice and Princess Eugenie pay price for row over Duke of York's trade role (http://www.telegraph.co.uk/news/uknews/theroyalfamily/8408879/Princess-Beatrice-and-Princess-Eugenie-pay-price-for-row-over-Duke-of-Yorks-trade-role.html)

Further scrutiny on Duke of York over lobbying (http://www.telegraph.co.uk/news/uknews/theroyalfamily/8372507/Further-scrutiny-on-Duke-of-York-over-lobbying.html)

Timeline: the Duke of York's questionable friends (http://www.telegraph.co.uk/news/uknews/theroyalfamily/8366227/Timeline-the-Duke-of-Yorks-questionable-friends.html)

Labour MP: Prince Andrew is 'an embarrassment' (http://www.telegraph.co.uk/news/newsvideo/uk-politics-video/8366220/Labour-MP-Prince-Andrew-is-an-embarrassment.html)

Duchess negotiated debt pay-off for several months (http://www.telegraph.co.uk/news/uknews/theroyalfamily/8366981/Duchess-of-York-spent-nine-months-negotiating-with-convicted-paedophile-Jeffrey-Epstein-to-pay-off-her-debts.html)

Mr Edwards, meanwhile, claims Epstein is abusing the legal system by seeking to intimidate other lawyers and girls, and is counter-suing the financier for substantial damages.

He is seeking to prove to the court that Epstein did sexually abuse dozens of children, allegedly at his Florida mansion in most cases, where the Duke enjoyed holidays and massages. Jack Scarola, the lawyer representing Mr Edwards, told The Daily Telegraph: "We would be very keen to speak with Prince Andrew, given his relationship with Jeffrey Epstein.

"We want to obtain additional details on the scope of Mr Epstein's alleged sexual abuse of children — when, where, how frequently and the extent to which it involved the transport of children inside and outside the United States for sex.

"We have reason to believe that Prince Andrew has been in the company of Mr Epstein while Mr Epstein has been in the company of under-aged children."

Asked whether he had any reason to suspect the Duke had been present while under-age girls were abused, Mr Scarola said: "That's not something I can publicly comment on. We have an ongoing investigation and an ongoing prosecution of a civil case. These are not matters of public record and I am restricted in what I can say on the public record."

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There is no allegation that the Duke had sexual contact with any of the girls or that he was aware of any wrongdoing by Epstein.

Mr Scarola added: "Deposition testimony has been taken generally concerning Mr Epstein's association with many high -profile people."

Documents filed in the case so far include Epstein's private phone directory — which included numerous contact details for the Duke, along with masseuses and dozens of other prominent friends. They also include flight logs for Epstein's private jet, which detailed a trip the Duke took with him in 2000 and a 1998 meeting between Epstein, the Duchess of York and Princesses Beatrice and Eugenie.

Mr Scarola said he anticipated "significant procedural impediments" in obtaining sworn deposition from the Duke, due to his ability to claim diplomatic immunity. He said he may be forced to turn to international law.

"The Hague Convention specifically outlines procedures that must be followed for the citizen of one country to be compelled to give testimony regarding a case pending in another," he said.

A Buckingham Palace spokesman declined to comment.

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PalmBeachDailyNews.com
THE SHIRT SHEET

Jeffrey Epstein address book 'Holy Grail' of famous names

By **MICHELE DARGAN**
DAILY NEWS STAFF WRITER

Updated: 7:58 p.m. Friday, March 11, 2011
Posted: 7:57 p.m. Friday, March 11, 2011

When talking about the personal address book of billionaire sex offender Jeffrey Epstein, the term "little black book" takes that phrase to a whole new level.

Manhattan money manager Epstein's book reads like a laundry list of the world's richest and most powerful people, including some Palm Beachers.

Referred to as "The Holy Grail" by Epstein's former house manager — now serving time for trying to sell it to attorneys — the 97-page address book details multiple addresses, phone numbers, e-mails and other contact information for former President Bill Clinton, Britain's Prince Andrew and Sarah Ferguson, Donald Trump, Sen. John Kerry, various members of the Kennedy clan and former British Prime Minister Tony Blair, among many others.

The British press has been having a field day digging up new details about Epstein's friendship with Prince Andrew. Virginia Roberts — known only as Jane Doe 102 in court papers — has been dishing her story to London's Daily Mail. Details include Roberts having been in the company of the prince three times at Epstein's behest.

Roberts also recounted meeting Clinton on Epstein's private Caribbean island, according to the Mail.

But Roberts made no suggestion of sexual relations with Prince Andrew or with Clinton, the Mail reported. Similarly, there is no suggestion of anything salacious with any of the Palm Beachers listed among the money manager's contacts.

Roberts — who spent four years with Epstein — refers to him as "a monster" who paid her lavishly to satisfy his and his friends sexual whims — although Roberts doesn't identify the friends.

British papers also have reported that Ferguson accepted £15,000 from Epstein. The money was paid to her former assistant, who claimed Ferguson owed him unpaid wages and other bills. Ferguson has since told the Mail and other British papers that she made "a gigantic error of judgment" in accepting the money from Epstein and that she will pay him back.

The entire "Grail" was made public as part of a pending civil court case in which Epstein is suing attorney Brad Edwards, who represented several underage girls who sued Epstein.

Epstein sued Edwards, alleging he was involved in false claims made by Ponzi schemer Scott Rothstein; Edwards countersued Epstein, saying he filed a frivolous lawsuit to get him to back down from representing the young women.

All the lawsuits against Epstein said his modus operandi in the initial visit was the same: The girls were taken to Epstein's Palm Beach mansion and led upstairs to a spa room by one of Epstein's assistants, where he would ask the girls to perform sexually charged massages and/or various sex acts, for which he would pay them.

Other high-profile names in Epstein's book include Special Envoy for Middle East Peace George Mitchell, New York City Mayor Michael Bloomberg, New York Gov. Andrew Cuomo, Barbara Walters, Alec Baldwin, Ralph Fiennes, George Hamilton, Dustin Hoffman, Kevin Spacey, Liz Hurley, Lauren Hutton, Janice Dickinson, Naomi Campbell, Christy Turlington, Henry Kissinger, Joan Rivers, Courtney

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EXHIBIT 5

Mick Jagger, Cornelia Guest, Phil Collins, Itzhak Perlman, Simon LeBon, Charlie Rose, Richard Branson, playwright Candace Bushnell, designers Tom Ford and Vera Wang, soap opera actress Nadia Bjorlin and erotic film star Koo Stark, who once dated Prince Andrew.

Among the high-powered Palm Beachers listed in the money manager's address book are Catherine and Fred Adler, Samantha and Serena Boardman, Jimmy and Jane Buffett, Pepe Fanjul, Conrad and Barbara Black, Gerry Goldsmith, Marjorie Gubelman, Dana Hammond, David Koch, Henry Kravis, Frayda and George Lindemann Sr., Bob and Todd Meister, Alfred Taubman, Stanley, Bea and Brett Tollman, and Martin Trust.

Gaston Cantens, a spokesman for Florida Crystals Corp., said Fanjul and Epstein "obviously knew each other and had some contact in the past. But there isn't any ongoing business or social relationship with Mr. Epstein."

Reached by phone at his Palm Beach home, media mogul Black said he knew Epstein as "a friend of my colleague Mr. Wexner."

Les Wexner, CEO of The Limited Brands, was reported to have been Epstein's biggest client and close friend. Wexner replaced Epstein as his money manager, according to recent reports.

Some of the names in Epstein's book are sub-listed under geographic locations. The heading "massage" is notated under many of Epstein's locations. Names and phone numbers, most of them first names only, are listed under the massage entries.

Registered as a level 3 sex offender, Epstein pleaded guilty to soliciting underage girls for sex at his El Brillo Way home in Palm Beach. In addition to serving 13 months of an 18-month jail sentence, Epstein has settled at least two dozen lawsuits with young women for undisclosed amounts.

Find this article at:

http://www.palmbeachdailynews.com/news/jeffrey-epstein-address-book-holy-grail-of-famous-1315130.html

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Prince Andrew's link to sex offender Jeffrey Epstein taints royalty in US

The Duke of York's friendship with billionaire convicted paedophile Jeffrey Epstein has put him on American front pages



Paul Harris in New York
The Observer, Sunday 13 March 2011

A larger | smaller



Prince Andrew is finding his friendships under international examination. Photograph: Facundo Arrizabalaga/EPA

The British press has a new admirer. Spencer Kuvin, a Florida lawyer who has fought several cases for young women alleging sexual abuse by the disgraced billionaire Jeffrey Epstein, is delighted – and relieved – that newspapers are now examining Prince Andrew's relationship with the convicted paedophile.

"I am glad the British press has picked this up," Kuvin told the *Observer*. "The British people have a right to ask why he [Prince Andrew] is hanging out with a convicted paedophile. I think that is a very good question to be asking."

Kuvin has been asking it for a while. He believes Epstein has in effect got away with most of his crimes because of his wealth and his connections with the powerful and well-connected across America and the world.

"He's fine. He has a great life," he said of the man who spent less than two years in jail after pleading guilty to child sex offences.

That is probably true. Florida law allows anyone to find out the whereabouts of a convicted sex offender via an online database. According to the website last week Epstein's location was St Thomas in the US Virgin Islands in the Caribbean. He owns a private island there: one that Prince Andrew has visited. "Epstein is probably sunning himself on a beach right now," Kuvin said.

The same cannot be said for the Duke of York. This weekend, as he considers the parlous state of his international reputation, he is likely to feeling a lot less comfortable than his one-time party friend.

It was not meant to be this way for the prince. America is supposed to be a happy hunting ground for the British royal family. It is a place where the people see them as

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EXHIBIT 6

exotic celebrities to be feted, admired and placed alongside the homegrown "royalty" of Hollywood.

American citizens and politicians – freed from the burdens of paying for a civil list of their own – can indulge in the sort of innocent worship of monarchical "glam" that typified Britain in the 1950s.

So recent headlines in the US media have come as a bit of a shock. "Seen around town: Prince Andrew and Perv Billionaire," blared the *New York Post*. "Duchess of York apologises for accepting money from sex offender," read the *New York Daily News*. So much for the eager anticipation of a slew of good publicity around the marriage of Prince William and Kate Middleton.

It was not just the American tabloids. Even the *Wall Street Journal* ran a lengthy piece last week prompted by the fallout from Prince Andrew's long friendship and close relations with Epstein, 58, who served 18 months for sexual offences involving underage girls. No wonder *New York Post* columnist Andrea Peyser weighed in on the controversy about what she called a "bromance" between the pair. Prince Andrew, she concluded, was an "idiot prince".

It is hard to fathom the depths of the PR disaster that continues to unfold around the prince because of his links to Epstein. After he was snapped walking side by side with Epstein through Central Park last December, Andrew has seen his entire globetrotting existence as a trade ambassador put under the microscope. It has not borne up well.

Suddenly his life and times partying with Epstein have become public knowledge, complete with sordid details of being surrounded by young women and being present at topless pool parties. A woman, Virginia Roberts, who provided sexual services for Epstein and his rich friends while underage, saw the photograph and decided to speak about her experiences. Another picture rapidly surfaced, of Roberts side by side with the prince. To cap it all, Andrew's links to a whole series of unpleasant developing world autocrats and dictators have also come under fresh examination.

None of it has made a pretty picture and the royals – perhaps typically – have been slow to react in any meaningful way. First, the problem was ignored. Then it was dismissed. Only now, belatedly, have they begun to address it with reports that the Queen has talked to Andrew privately. It feels too little, too late.

Like many Europeans, perhaps, Andrew enjoyed the US because of the freedom and opportunities it afforded. The social scene in glittering hotspots like Manhattan and Florida's Palm Beach allowed him to free himself from the stuffy world of aristocratic Britain. He was courted and won over by the rich elite and he repaid the compliment.

No one knows why the prince carried on such a close friendship with a figure like Epstein for so long or why he refused to end it after Epstein went to jail. The facts alone should have been a warning sign. Epstein, a working class Brooklyn boy who became a super-wealthy money manager, was one of the world's most renowned playboys. But in 2008, after a three-year investigation into the young women he and his entourage procured, he wound up in jail. Nor was it an isolated incident. Epstein's case was ended via a plea bargain where he admitted guilt on a charge of felony solicitation of prostitution involving a minor. Yet as many as 40 young women had made allegations against him and, unusually, his plea deal allowed other accusers to sue him in civil court. So far at least 17 of them have settled civil cases against him.

The American drama is far from over for the prince. Instead the legal wranglings around Epstein and his exotic lifestyle threaten to drag the royal family right into the US court system.

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Epstein is now suing Brad Edwards, a lawyer for some of the girls from the original investigation. In turn Edwards is counter-suing Epstein, alleging that the billionaire is using his vast resources to pursue expensive legal cases and thus intimidate other victims and their legal representatives. Either way, Andrew could be pulled into the mess as a witness. Edwards's lawyer, Jack Scarola, said last week that his team intended to try and get a statement from the prince about what he may or may not have seen while attending parties with Epstein.

Though the prince is likely to claim diplomatic immunity, that step will not keep his name out of the court papers or the headlines: it will just keep his presence out of the courtroom.

The same thing goes for previous cases involving Epstein. They amount to a potential source of PR torture for the royal family as media scrutiny continues. Recently released documents from a different case showed that two of Epstein's closest confidantes – his PA Sarah Ellen and an on-off girlfriend, Nadia Marcinkova – were repeatedly questioned by Kuvin about whether the prince had been involved in sexual acts with any of Epstein's entourage of young women. Both Ellen and Marcinkova declined to answer the questions and instead took the Fifth Amendment, which allows their legal silence.

Of course, there is no evidence or suggestion that Andrew was involved. But in PR terms there does not need to be. There is even a small chance that the FBI will use some of the new revelations emerging in the media to reopen the criminal case against Epstein, though legal experts think it unlikely.

Even the hint of a possibilty of a federal probe is another reason for the headline writers to start sharpening their pens for those with links to Epstein.

Prince Andrew is not the only one. Epstein has partied in New York with numerous people since he left jail, including big names and celebrities like Katie Couric, George Stephanopoulos and Woody Allen. Perhaps they too should have known better.

ROYAL CONNECTIONS

■ **Ghislaine Maxwell**, 49, youngest daughter of Robert Maxwell, the former *Daily Mirror* proprietor, is considered one of Prince Andrew's more controversial friends. A decade ago, he was reported to have accompanied her to a "hookers and pimps" party in New York. Ghislaine moved to the US in 1991 after the death of her father and became a fixture on the Manhattan party circuit, where she befriended Jeffrey Epstein.

■ **Goga Ashkenazi**, 31, a glamorous Kazakh oil tycoon, claims to be a "close friend" of Prince Andrew. Ashkenazi, an Oxford-educated socialite and entrepreneur, said: "Britain is very lucky to have him." She was introduced to Andrew in 2001 and they have been friends since. She was his guest at Ascot in 2007, although she denies rumours that they have ever been a couple.

■ **Tarek Kaituni**, a convicted Libyan gun smuggler, is an old friend . In 2008 he and Andrew enjoyed a four-day holiday to Tunisia. Kaituni was convicted of buying a machine gun in 2005 and secretly attempting to transport it from Holland to France.

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Duke of York's friend could be back in US courts

Lawyers to question Prince Andrew's sex offender associate.

By Jonathan Owen
Sunday, 13 March 2011

The Duke of York's attempts to quell the furore surrounding his relationship with the billionaire sex offender Jeffrey Epstein appeared doomed this weekend when it emerged that more lurid details are to be aired in a US court within the next two weeks.

Buckingham Palace was forced to deny that the Duke of York had postponed plans for a trip to Saudi Arabia next week, because of negative media coverage, amid reports in some media that the controversy had made him "toxic". A spokesman said: "Buckingham Palace has never announced any overseas visits for the Duke of York."

The issue refuses to die down, with two Lib Dem ministers breaking rank last night and privately suggesting they think Prince Andrew should quit as trade envoy. One said: "If he was a politician doing this, he would have gone by now, and rightly so." Another added: "That in the 21st century we should be putting up with this is obscene. It is incredibly difficult for the Government, more so the Tory side, but it cannot carry on."

Even attempts by supporters to rally to his cause have been of mixed benefit. The Duchess of York's apology for a "gigantic error of judgement" in accepting money from Epstein only served to fuel reporting, as did reports of the Prince's links to Kazakhstan and the socialite Goga Ashkenazi, who is reported to have had been involved in the sale of the Duke's home to kazakh oil billionaire Timur Kulibayev. There was also criticism last week when it emerged that the prince lobbied MP Mark Field this week to help to boost UK exports to oil-rich Azerbaijan, a country with a questionable human rights record.

Now US lawyers hope to use a legal dispute between Epstein and Brad Edwards, a Florida attorney, to insist that Epstein reveal more about his relationship with the prince. Epstein will be questioned on allegations he procured sexual favours from minors for friends and forced to answer allegations that he abused up to 40 girls. Many of the most damaging recent headlines about the Duke of York have centred around a photograph of him with his arm around a girl who claims she was abused by Epstein.

Jack Scarola, one of the lawyers close to the case, said: "We are in the process of scheduling a further deposition of Mr Epstein at which we intend to question him regarding the details of his child abuse, including all circumstances in which he may have been involved in procuring sexual favours from minors for his high-profile friends."

Asked whether the duke was with Epstein when minors were present, he said: "The details of that relationship will be a subject of inquiry when Mr Epstein's testimony is taken." The FBI is said to be ready to reopen its criminal investigation into Epstein, convicted in 2008 for soliciting an underage girl for prostitution. A number of women are challenging a plea bargain deal which allowed the billionaire to avoid trial. Epstein, 58, was sentenced to 18 months in prison after admitting two sex offences.

None of this will help Prince Andrew's attempts to damp down coverage questioning his judgement and his choice of associates as he travels the world as a commercial envoy for the UK.

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EXHIBIT 7

Additional reporting by Andrew McCorkell, Emily Dugan and Matt Chorley

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Victims of Sexual Abuse Demand Justice

Last week the Philadelphia archdiocese suspended 21 Roman Catholic priests who were named as child molestation suspects in a scathing grand jury report released last month.

FOR IMMEDIATE RELEASE

(Free-Press-Release.com) March 17, 2011 — Contact

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.

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Kim Sailer, BARD Marketing/PR

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Fort Lauderdale, FL -- Last week the Philadelphia archdiocese suspended 21 Roman Catholic priests who were named as child molestation suspects in a scathing grand jury report released last month. Regarding another sex scandal, over the last two weeks, hundreds of news articles have reported billionaire pedophile Jeffrey Epstein's close relationship with Britain's Prince Andrew. Farmer Jaffe Weissing Attorney Brad Edwards has pursued victim rights cases on behalf of ten women who, between 12 and 15 years of age, were sexually molested and abused by Epstein. Edwards proved that Epstein and his international sex trafficking criminal enterprise exploited them and hundreds of other underage girls.

Powerful organizations like the Catholic Church have been able to shelter accused priest and clergy as there continues to be no mention of penalties, censures, or removal from office for bishops who continue to hide and cover-up for the abusive priests. Many sexual predators, like Epstein, are wealthy and powerful and able to focus vast resources and high profile legal teams in an attempt to deflect attention, avoid criminal liability, and deny justice to their victims. According to a U.S. Health and Human Services study, more than 83,000 substantiated reports of sexually abused children were made in 2005 alone. The actual number of incidents of sexual abuse is likely much higher because it is believed that sexual abuse, especially amongst children, is significantly underreported. Sexual abuse and molestation cause great suffering for victims. Victims often deal with unimaginable humiliation and shame and it often leaves long-lasting emotional and psychological damage.

Edwards hopes that the media attention focused on the recent Philadelphia archdiocese sex scandal and on Epstein's sexual abuse will continue to "inspire victims to report these crimes" and will convey his belief "that victims rights cases can effectively protect their rights, maintain their anonymity, and hold predators accountable." At Farmer Jaffe Weissing, our goal is to help sexual abuse victims obtain justice, counseling and compensation for their suffering. If you or a loved one has been abused by a



priest / clergy, a teacher, a scout leader or anyone else, please don't hesitate to contact Farmer Jaffe Weissing at 800-400-1098.

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L., a Fort Lauderdale Litigation firm, focuses on Consumer Class Actions, Sexual Abuse Cases as well as other significant Personal Injury, Wrongful Death, and Whistleblower Suits (qui tam). The firm is headquartered at 425 N. Andrews Avenue, Suite 2, Fort Lauderdale, Florida 33301 and may be reached at (800) 400-1098 or (954) 524-2820. Additional information about Brad Edwards or Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. may be obtained from the firm's website at http://www.pathtojustice.com.

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Press Releases

APRIL 2011

Farmer Jaffe Weissing Proudly Supports National Volunteer Week

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman supports National Volunteer Week (April 10-16). Our firm is very involved in giving back to our communities. Members of our firm support various charities, sit on non-profit boards, and do volunteer work with local schools and religious organizations. We are community-conscious and believe we have an obligation to give back o a society that has afforded so much to us and our families.

Want to make a difference too? Visit the sites below for local volunteer opportunities:

- Volunteer Broward: http://www.volunteerbroward.org
- Volunteer Match: http://www.volunteermatch.org

MARCH 2011

Thank You Letter from the Alzheimer's Association, Southeast Florida Chapter

Here is a wonderful letter we received from the Alzheimer's Association, Southeast Florida Chapter thanking attorney Steven Jaffe for the $100,000 donation, which was a court approved payment of a settlement fund, as a result of the long-term care insurance class action law suit - Ruderman v. Washington National Insurance Corporation.

Brad Edwards Files Motion in Jeffrey Epstein Case - Violation of Crime Victim's Rights Act

Attorney Brad Edwards filed a motion in Federal Court this week saying the U.S. Attorney's Office violated the ***Crime Victims' Rights Act*** by signing a nonprosecution agreement with sex offender Jeffrey Epstein without notifying his clients. News coverage included the Palm Beach Post and Main Justice.

Join TEAM LINDSAY - Crohn's & Colitis Takes Step Walk

Attorney Steven Jaffe's daughter Lindsay suffers from CROHN'S DISEASE...this is an incurable disease of the intestines. Each year we join other families to WALK FOR CROHN'S. This year's 1-mile walk is Saturday, April 16, 2011, at 7pm at Huizenga Plaza on the Las Olas Riverfront. Won't you please consider helping our ***TEAM LINSDAY***, click here for details. We'd also love for you to walk with us!

Gary M. Farmer, Sr. Joins The Firm

Farmer Jaffe Weissing is pleased to announce that Gary M. Farmer, Sr., retired Fourth District Court of Appeal Judge, has joined the firm, as of-counsel and will provide litigation support and appellate representation in both civil and criminal cases.

London Papers Quote Edwards in Recent Jeffrey Epstein / Prince Andrew Scandal

London newspapers recently quoted attorney Brad Edwards regarding billionaire pedophile Jeffrey Epstein's close relationship with Britain's Prince Andrew. Last year Edwards helped 10 women seek justice, who were sexually molested and abused by Epstein. National and local news coverage included London's The Telegraph, London's Daily Mail and South Florida's Palm Beach Daily News.

Firm Sponsors Alzheimer's Association Gala

Farmer Jaffe Weissing proudly supports The Times of Your Life Gala honoring the Alzheimer's Association. Click here for program.

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EXHIBIT 9

FEBRUARY 2011

Lehrman Presents at Nova Southeastern University School of Law

Attorney Seth Lehrman recently gave a lecture to law students at Nova Southeastern University Shepard Law Center on the Ethical Challenges Arising From a Law Firm's Sudden Dissolution.

Weissing's Foster Care Success Story

Attorney and Foster Parent Matt Weissing was featured in the Junior League of Boca Raton's Winter 2011 magazine - The Bridge, discussing his experience with being a foster parent.

JANUARY 2011

Jaffe Presents $100,000 Check to Alzheimer Association

Attorney Steve Jaffe and Co-counsel Steven M. Dunn presented a $100,000 check to the Alzheimer's Association, Southeast Chapter. The cy pres award (a court approved payment of settlement funds) was a result of a precedent setting long-term care insurance class action law suit - Ruderman v. Washington National Insurance Corporation.

Jaffe Nominated Volunteer of the Year

Attorney Steve Jaffe has been named Volunteer of the Year by the Florida Chapter of the Crohn's & Colitis Foundation of America (CCFA).

DECEMBER 2010

Class Action Settlement Creates $8 Million Fund For Elderly Floridians

Judge James I. Cohn of the U. S. District Court for the Southern District of Florida has granted final approval of a class action settlement which creates an $8 million fund for elderly class members with home healthcare insurance policies issued by Washington National Insurance Company (WNIC). The agreement also places all those elderly insured's back on claim, meaning the insurance company will now be responsible for the cost of care of our clients.

Attorneys Steve Jaffe and Mark Fistos also received court approval that required WNIC to make a $100,000 cy pres award (donation) to a charity whose mission is to serve the needs of the elderly – the court approved the Alzheimer Association as recipient of the donation.

Mowat, et al v. DJSP Enterprises, Inc., et al.

Attorneys Gary Farmer, Mark Fistos, Seth Lehrman and co-counsel, who are representing former employees of the law firm of David J. Stern and a related company, have filed a federal class action lawsuit asking for back wages and benefits because they claim that hundreds of employees were fired without 60 days' advance notice, as required under federal law.

The suit charges that Stern's law firm and its publicly traded processing unit DJSP Enterprises didn't follow the Worker Adjustment and Retraining Notification Act or WARN Act requirement to give employees 60 days' warning – plus pay and benefits – before a mass layoff. Local news coverage included South Florida Business Journal, Sun-Sentinel, Miami Herald, Palm Beach Post, and CBS4 Miami.

OCTOBER 2010

Weissing Nominated 2010 Most Effective Lawyer

Attorney Matt Weissing was selected as a 2010 Most Effective Lawyers semi-finalist by the editorial staff of the Daily Business Review.

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AUGUST 2010

United States of America v. Scott W. Rothstein

Attorney Seth Lehrman prevailed in the firm's prosecution of criminal forfeiture and restitution claims on behalf of thirty-seven former Rothstein Rosenfeldt Adler ("RRA") clients who sought to recover more than one million dollars of settlement monies that had been deposited into a trust account of the RAA law firm prior to Scott Rothstein's widely publicized theft of those monies. After the implosion of RRA, our firm agreed to represent these individuals free of charge. The court's order detailed the monies owed to them. Outside the courthouse, Mr. Lehrman commented, "This is full justice for good and deserving people." Mr. Lehrman's victory has been the subject of several media reports, including, the Sun Sentinel, Bloomberg, South Florida Business Journal, and Law.com.

Geico Indemnity Co. v. Physicians Group, LLC, a/a/o Paul Androski

Attorney Gary Farmer drafted the winning brief in *Geico Indemnity Co. v. Physicians Group, LLC, a/a/o Paul Androski*, in which the Second District Court of Appeal confirmed on August 13, 2010, that the fee schedule amendments to the Florida Motor Vehicle No-Fault Law, § 627.736, Fla. Stat. (2008) ("PIP") effective January 1, 2008, do not apply retroactively. The court's ruling settles an issue which has been hotly contested in lower courts.

JULY 2010

Mercedes Zota, et al v. Lighthouse Intracoastal Inc., et al.

Attorney Matt Weissing's case, *Mercedes Zota, et al v. Lighthouse Intracoastal Inc., et al.*, was the subject of an article in the Daily Business Review.

JUNE 2010

Farmer Named FJA Treasurer

Attorney Gary Farmer is being sworn in as Treasurer of the Florida Justice Association. Gary has served as Secretary of the Florida Justice Association since June 2009 and served on its Board of Directors since 2005.

$10,800,000 Verdict

Attorney Matt Weissing received a jury verdict of $10,800,000 on behalf of a client who sustained brain injuries when she fell and struck her head while working at a construction site.

MAY 2010

$735,000 Verdict

Attorney Brad Edwards won a $735,000 jury verdict in a case brought on behalf of truck driver who lost three toes due to a warehouse accident.

Class Certification Upheld

The United States Court of Appeals for the Seventh Circuit issued an opinion upholding the trial court's order certifying a multi-state class in *Saltzman v. Pella*, Case No. 06 C 4481, which is pending in the United States District Court for the Northern District of Illinois. Attorneys Steve Jaffe and Mark Fistos are handling the case.

Edwards Prevails on Key Rulings in Epstein Case

Attorney Brad Edwards succeeded in convincing a federal judge that billionaire Jeffrey Epstein must disclose specific figures showing his net worth. Brad also received a favorable ruling allowing his client access to a recording and transcript of a recording of a reporter's off-the-record interview with Epstein. The reporter's newspaper had sought to have the materials protected from disclosure based on a "qualified reporter's privilege." Brad is representing several young women in civil suits in which they allege Mr. Epstein sexually assaulted them when they were teens. Trial is set to begin July 14, 2010.

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Lehrman Represents Football Great, Warren Sapp, and Others in Forfeiture Proceedings

Attorney Seth Lehrman has filed papers in forfeiture proceedings in bankruptcy court on half of Warren Sappand others to recover monies they lost in trust funds held by Ponzi schemer, Scott Rothstein, which were never accounted for.

April 2010

$520 million Whistleblower Recovery

Attorney Gary Farmer resolved a Whistleblower suitagainst pharmaceutical giant AstraZeneca, which will pay **$520 million** in civil fines and restitution to state and federal entities. The firm disseminated a press release on the case. The U.S. Attorney General issued remarks about the settlement. The federal Department of Justice also announced the settlement. The settlement agreement is available on our site.

March 2010

Law School Presentation

Firm Attorney Seth Lehrman gave a presentation on law practice management at Nova Southeastern University Shepard Broad Law Center in Ft. Lauderdale, Florida.

February 2010

Firm Hosts FJA Event

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. hosted a Florida Justice Association member appreciation reception on the rooftop of the firm's Ft. Lauderdale offices. Photos were taken of the event.

Qui Tam Presentation

Firm attorney Gary Farmer was a presenter at the Florida Justice Association's Workhorse Seminar in Orlando. He spoke on Qui Tam litigation, which has been the focus of much of his law practice. Qui Tam suits are also commonly known has whistleblower suits. Gary was one of the originating attorneys in the Qui Tam settlement involving Eli Lilly and the drug Zyprexa that resulted in a record $1.42 billion dollar settlement for illegal off-label marketing of drugs. Gary has handled notable class actions and other Qui Tam settlements.

January 2010

Class Certification Granted in Long Term Health Insurance Case

The firm won a contested class certification ruling for the class action plaintiffs in one the firm's long term health insurance cases, *Ruderman, et al., v. Washington National Insurance Company* filed in the United States District Court for the Southern District of Florida, Case No. 08-CV-23401-COHN/ROSENBAUM. Attorneys Steve Jaffe and Mark Fistos are representing the injured parties as Plaintiffs' counsel in this class action case. The defendant's petition to appeal the order was denied on March 4, 2010. The case has been stayed pending settlement discussions.

Jaffe Sworn in as BCJA President

Attorney Steve Jaffe commenced his tenure as President of the Broward County Justice Association with his inaugural message to BCJA members.

November 2009

Nova Presentation

Attorney Seth Lehrman was a presenter a law office management workshop at at Nova Southeastern University Shepard Broad Law Center in Ft. Lauderdale, Florida.

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October 2009

Attorney Brad Edwards assisted with a *victim's rights* workshop in Orlando.

September 2009

Jaffe Appointed CCFA Board Member

Attorney Steve Jaffe was appointed to the Board of Trustees of the Crohn's and Colitis Foundation of America (Florida Chapter). Crohn's and Colitis Foundation of America is a non-profit, volunteer-driven organization dedicated to finding the cure for Crohn's disease and ulcerative colitis.

June 2009

Class Certification Granted in Pella Windows Case

With their co-counsel, attorneys Steve Jaffe and Mark Fistosprevailed for the injured victims named as plaintiffs on a contested multistate class action certification motion pending in the United States District Court for the Northern District of Illinois, in the class action case *Saltzman v. Pella*, Case No. 06 C 4481.

February 2009

NationsRent Administrative Fee Class Action Settled

With their co-counsel, firm attorneys Steve Jaffe and Mark Fistos won for the class action plaintiffs a contested nationwide class certification in *In Re NationsRent Fee Litigation* Case No. 06-60924-CIV-BROWN, filed in the United States District Court for the Southern District of Florida. A settlement has been reach for the class. The court entered an order finally approving the settlement on March 31, 2010.

January 2008-Present

Weissing Continues to Serve Foster Care Community

Attorney Matt Weissing continues to volunteer for 4Kids of South Florida, which provides Safe Place intake services for every dependent child which is taken into care in Broward County, serves children and those providing Foster Care, Adoption, Crisis Pregnancy, and provides stability for kids who are aging out of the foster care system. Matt and his family first became involved with the organization in 1996, when they accepted responsibility for a foster son.

Seeing the needs of foster children throughout our community, Matt became an advocate for foster children making numerous appearances on local radio stations, speaking before community organizations, in churches, etc. In 2008, 4Kids was recognized by the White House as the model for Foster Care in the United States.

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Michelle E. Breaux This is great information. Thank you for sharing :)
March 9 at 11:21am



Farmer Jaffe Weissing
In the last week, hundreds of news articles have reported billionaire pedophile Jeffrey Epstein's close relationship with Britain's Prince Andrew. Attorney Brad Edwards was interviewed by several publications – London's The Telegraph, London's Daily Mail and the Palm Beach Daily News. Last year Edwards helped 10 women seek justice, who were sexually molested and abused by Epstein. To view coverage visit: http://www.pathtojustice.com/media-center/press-releases/



March 8 at [illegible] · Share

4 people like this.



Jon Zepnick Sidney, Brad
March 9 at 5:[illegible]



Pat Diaz Brad Congrst Great Job!!!
March 9 at 12:01[illegible]



Madeline Garcia Superman
March 17 at 10:35pm

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EXHIBIT 10

IN THE CIRCUIT COURT, 15TH JUDICIAL CIRCUIT, IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 562010CA000161

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually, BRADLEY J. EDWARDS, individually, And L.M., individually,

Defendants.

****

HEARING BEFORE: HONORABLE DAVID F. CROW

DATE TAKEN: March 31, 2011

TIME: 8:32 a.m. to 8:53 a.m.

PLACE: Palm Beach County Courthouse
205 N. Dixie Highway, Room 9C
West Palm Beach, Florida 33401

REPORTED BY: Kathleen M. Ames, RPR

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EXHIBIT 11

allegations.

THE COURT: Okay. Well, I thought I -- well, never mind. Go ahead.

MR. SCAROLA: What Your Honor will see, when you have a chance to take a look at that amendment to the complaint, is that there has been an effort to try to remove from the complaint any assertion that Mr. Epstein was not guilty of the underlying crimes and torts that resulted in his criminal prosecution and the civil claims against him. However, in spite of that effort - because what they have attempted to state, as they describe it in a very recent submission to Your Honor, the case management report - is an abuse of process claim against Mr. Edwards. And the theory of the abuse of process claim is that Mr. Epstein is an innocent man who was falsely targeted as a serial pedophile who openly victimized young children in the presence of his high profile friends. Falsely targeted, with those allegations, for the sole purpose of attempting to enhance the marketability of Ponzi scheme interests in those claims. That's the Plaintiff's theory. Still hasn't been able to articulate how he is damaged by that because it's not a defamation claim because the last thing they want to do is put Mr. Epstein's reputation in contention in this litigation but that's what they claim.

Mr. Edwards' theory of this case is that Mr. Epstein

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was and is an incorrigible pedophile who victimized scores of children internationally and openly in the presence of his high profile friends. And that among the victims of his RICO activities, because in the underlying case there were RICO claims, among the victims of his RICO activities were the particular individuals that Mr. Edwards was representing before he ever joined the Rothstein Law Firm. And that all of his efforts to investigate and prosecute those underlying claims were good faith efforts conducted in total ignorance of anything that was going on, as far as Mr. Rothstein was concerned. And that the sole purpose of the lawsuit filed against Mr. Edwards and one of his clients, while those cases were still pending, was to intimidate Mr. Edwards to abandon his very vigorous investigation and prosecution of those claims.

So whether we look at it from the perspective of the Plaintiff's theory of the case or whether we look at it from the perspective of the Defendant's theory of the case, what Mr. Edwards -- excuse me -- what Mr. Epstein was, in fact, doing is relevant and material. Clearly it's relevant and material from the counterclaim perspective because we allege a motive to cover-up an extensive pattern of international crime. That's why he's trying to scare Mr. Edwards off, intimidating him through this abusive process because he doesn't want the details of his

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