

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Reply Brief in Support of Defendant's
Motion for Summary Judgment**

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PRELIMINARY STATEMENT

Before the Court reaches the question whether plaintiff can prove falsity and actual malice, it should decide three questions of law, one that narrows considerably the legal issues and two that dispose of the case entirely.

1. It is undisputed Ms. Maxwell, through her agents, sent to various media-representatives—and to no one else—the January 2015 statement. It is undisputed she had no control over any of the media that decided to republish excerpts from the statement. On these facts, under black letter New York law, she is not responsible for these republications. Plaintiff’s contrary argument relies on a “foreseeability” doctrine the New York Court of Appeals has specifically rejected. Summary judgment should enter in favor of Ms. Maxwell as to any republication.

2. Under the New York Constitution, whether a statement is constitutionally nonactionable opinion depends upon, among other things, an examination of the full context of the communication and consideration of the setting surrounding it. The January 2015 statement, making no reference to specific allegations, explains *why* the author believes plaintiff’s allegations are “obvious lies”: “Each time the story is re told [sic] it changes with new salacious details” It is an expression of a venerable opinion: when a person falsely cries wolf previously, others are free to opine she is telling falsehoods now. This is nonactionable opinion.

3. Under New York law, a statement made pertinent to good faith anticipated litigation is nonactionable. The statement was sent exclusively to the media representatives, and contained a clear message: the media should not republish plaintiff’s “obvious lies,” else Ms. Maxwell would sue them. Such a statement is nonactionable.

If the Court reaches the question of falsity and actual malice, the Rule 56 record establishes plaintiff cannot prove falsity and actual malice by clear and convincing evidence.

ARGUMENT

I. Ms. Maxwell is not liable for republications of the January 2015 statement.

Under black letter New York law, liability for republication of an allegedly defamatory statement “must be based on real authority to influence the final product.” *Davis v. Costa-Gavras*, 580 F. Supp. 1082, 1096 (S.D.N.Y. 1984). “[W]here a defendant ‘had no actual part in composing or publishing,’ he cannot be held liable.” *Id.* (citing *Folwell v. Miller*, 145 F. 495, 497 (2d Cir. 1906)); accord *Geraci v. Probst*, 938 N.E.2d 917, 921 (N.Y. 2010). “[C]onclusive evidence of lack of actual authority [is] sufficiently dispositive that the [trial court] ‘ha[s] no option but to dismiss the case’” *Id.* (emphasis supplied; quoting *Rinaldi v. Viking Penguin, Inc.*, 420 N.E.2d 377, 382 (N.Y. 1981)).

It is undisputed Ms. Maxwell and her agents had no ability to control and did not control whether or how the media-recipients would use the statement. DOC. 542-7, Ex.J ¶¶ 2-3; *id.*, Ex.K ¶ 24. Unsurprisingly, plaintiff has offered no evidence of such control. *A fortiori* this Court “ha[s] no option but to dismiss the case,” *id.* (internal quotations omitted), to the extent it is founded upon the media’s republication of the statement.

A. Plaintiff’s argument against summary judgment is substantially groundless.

A legal argument is frivolous if it is presented contrary to a “long line of authorities” and the “fundamental principles”¹ of the underlying substantive law. Plaintiff Giuffre’s argument opposing summary judgment as to republication is frivolous.

The New York Court of Appeals in *Geraci* followed a long line of New York cases holding that a defamation defendant is not liable for republication of his allegedly defamatory statement unless he had “actual authority” to control the decision to republish: “Our

¹*Porky Prods. v. Nippon Exp. U.S.A.*, 1 F.Supp.2d 227, 234 (S.D.N.Y. 1997), *aff’d*, 152 F.3d 920 (2d Cir. 1998).

republication liability standard has been consistent for more than one hundred years.” See *Geraci*, 938 N.E.2d at 921 (footnote omitted). Indeed, the *Geraci* court observed, the New York Court of Appeals in *Schoepflin v. Coffey*,² a case decided in 1900, held:

“*It is too well settled to be now questioned* that one who . . . prints and publishes a libel[] is not responsible for its voluntary and unjustifiable repetition, without his authority or request, by others over whom he has no control and who thereby make themselves liable to the person injured, and that *such repetition cannot be considered in law a necessary, natural and probable consequence of the original slander or libel.*”

938 N.E.2d at 921 (emphasis supplied; quoting *Schoepflin*, 56 N.E. at 504).

The cases in which this Court and its sister courts in this Circuit assiduously have followed this line of New York cases are legion.³ The Second Circuit was in the vanguard.⁴

²56 N.E. 502 (N.Y. 1900).

³See *Egiazaryan v. Zalmayev*, 880 F. Supp. 2d 494, 501 (S.D.N.Y. 2012) (“[t]he original publisher is not liable for republication where he had ‘nothing to do with the decision to [republish] and [he] had no control over it.’”) (quoting *Rinaldi v. Viking Penguin, Inc.*, 425 N.Y.S.2d 101, 104 (1st Dep’t 1980), *aff’d*, 420 N.E.2d 377 (N.Y. 1981)); *Egiazaryan v. Zalmayev*, No. 11 CIV. 2670 PKC, 2011 WL 6097136, at *5 (S.D.N.Y. Dec. 7, 2011) (same); *Davis v. Costa-Gavras*, 595 F. Supp. 982, 988 (S.D.N.Y. 1984) (“Under New York law, liability for a subsequent republication must be based on real authority to influence the final product, not upon evidence of acquiescence or peripheral involvement in the republication process.”); *Davis*, 580 F. Supp. at 1094 (original publisher not liable for injuries caused by the republication “‘absent a showing that they approved or participated in some other manner in the activities of the third party republisher’”) (quoting *Karaduman v. Newsday, Inc.*, 416 N.E.2d 557, 560 (N.Y. 1980)); *Croy v. A.O. Fox Mem’l Hosp.*, 68 F. Supp. 2d 136, 144 (N.D.N.Y. 1999) (“The original author of a document may not be held personally liable for injuries arising from its subsequent republication absent a showing that the original author approved or participated in some other manner in the activities of the third-party republisher.”) (citations omitted); *Cerasani v. Sony Corp.*, 991 F. Supp. 343, 351 (S.D.N.Y. 1998) (“a libel plaintiff must allege that the party had authority or control over, or somehow ratified or approved, the republication”).

⁴See *Folwell v. Miller*, 145 F. 495, 497 (2d Cir. 1906) (affirming directed verdict in favor of managing editor: “when it appears affirmatively that he was not on duty [upon receipt of libelous matter and its republication], and could not have had any actual part in composing or publishing, we think he cannot be held liable without disregarding the settled rule of law by which no man is bound for the tortious act of another over whom *he has not a master’s power of control*”) (emphasis supplied), *quoted with approval in Davis I*, 580 F. Supp. at 1096; *Cerasani*, 991 F. Supp. at 351.

In the face of this uninterrupted line of New York state (and federal) cases dating back to the nineteenth century powerfully establishing a bright line rule regarding republication liability, plaintiff Giuffre manages what amounts to a—frivolous—murmur of opposition. She claims there are “[t]wo standards” in New York law: one “older,” and one “more modern.” Resp. 28. The “older” standard, plaintiff says, is represented by the legion of cases we have cited. The “more modern formulation”—where can it be found? Why, in one place: a treatise on defamation. *Id.* (citing *Sack on Defamation* § 2.7.2, at 2-113 to -114 (4th ed. 2016)). It surely is frivolous to argue that a treatise creates a republication-liability standard that is separate from, “more modern” than, and supersedes the New York Court of Appeals’ 2010 decision in *Geraci* and this Court’s 2012 decision in *Egiazaryan*.

Trying to build on this start, plaintiff argues, “New York appellate courts have *repeatedly held* than an individual is liable for the media publishing that individual’s defamatory press release.” Resp. 28 (emphasis supplied). Even if we accept plaintiff’s mischaracterization of the January 2015 statement as a “press release,”⁵ her argument still would be meritless. To begin with, when plaintiff says the New York appellate courts have “repeatedly” supported her claimed rule of law, she means . . . twice. And an examination of those two cases reveals she is quite wrong and, worse, has advanced a seriously misleading argument. Neither case involved, as here, a motion for summary judgment. In both cases, the New York appellate division affirmed the denial of a motion to dismiss under the state’s equivalent of Federal Rule of Civil Procedure 12(b)(6). *See Levy v. Smith*, 18 N.Y.S.3d 438, 439 (2d Dep’t 2015); *National Puerto Rican Day Parade, Inc. v. Casa Pubs.* (“NPR”), 914 N.Y.S.2d 120, 122-23 (1st Dep’t 2010).

⁵As discussed in This Reply, at 16-19, the January 2015 statement would be a strange “press release,” as it threatened to sue the very press to which it was “releasing” information.

This argument, too, is frivolous. Despite plaintiff's baseless claim there is an "old" formulation and a "more modern" formulation of republication-liability law in New York, both cases she cites *applied the same "old" standard used by the New York Court of Appeals in Geraci, by this Court in the two Egiazaryan cases*, and by us in our Memorandum of Law in support of Ms. Maxwell's motion for summary judgment. *See Levy*, 18 N.Y.S.3d at 439 (citing *Geraci* and *Schoepflin*); *NPR*, 914 N.Y.S.2d at 594-95 (citing *Hoffman v. Landers*, 537 N.Y.S.2d 228, 231 (2d Dep't 1989) (citing *Schoepflin*)).

Both the courts in *Levy* and *NPR* applied the *Geraci* standard and the 12(b)(6) standards, e.g., assuming the pleaded facts were true. They concluded it was possible to infer from the complaints' allegations that the defendant caused the republications. Accordingly, they denied the motions to dismiss. *See Levy*, 18 N.Y.S.2d at 439; *NPR*, 914 N.Y.S.2d at 123. It was improper for plaintiff to cite these cases without disclosing they are 12(b)(6) cases in which the courts applied the *Geraci* republication rule and inferred facts from the pleaded allegations.

B. New York state and federal courts have rejected liability for republication based on "foreseeability."

Plaintiff cites section 576 of the Restatement (Second) of Torts for the proposition that if republication was foreseeable, then the defendant is the cause of any special damages from the republication. This argument is frivolous. As an initial matter, plaintiff has pleaded no special damages. *See Doc.1*; *Doc.23* at 23; *Doc.37* at 17.

Regardless, the New York Court of Appeals in *Geraci* *rejected* the Restatement's foreseeability doctrine. *See* 938 N.E.2d at 921-22 (noting that section 576's foreseeability standard "is not nearly as broad as plaintiff . . . suggest[s]" and "[t]hat we did not endorse such a broad [Restatement] standard of foreseeability in *Karaduman* is evident from our decision the following year in *Rinaldi*"') (emphasis supplied).

While trying to distinguish this Court’s decision in *Davis*, plaintiff fails to disclose that *Davis* itself—decided 26 years before *Geraci*—also *rejected* plaintiff’s foreseeability argument. The *Davis* plaintiffs, like plaintiff Giuffre here, also asserted republication liability, despite defendant’s lack of participation, on the ground “he could reasonably have foreseen that republication would occur.” 580 F.Supp. at 1096. This Court, relying on *Karaduman*, was unpersuaded: The New York Court of Appeals “has not applied the foreseeability standard suggested by plaintiffs in prior libel cases in which such a standard would have been relevant, if not controlling.” *Id.* This Court noted: The jurisdictions that have adopted a foreseeability standard “have refused to hold responsible a defendant with no control or influence over the entity that actually republished the statement.” *Id.* Plaintiff’s failure to disclose this Court’s holdings in *Davis* is a notable lapse in candor.

C. Plaintiff’s purported application of the *Geraci* rule is misleading and wrong.

Plaintiff eventually purports to apply the “old” standard, that is to say, the controlling law in the state of New York. She argues Ms. Maxwell “authorized” the January 2015 statement, “paid money to her publicist to convince media outlets to publish it,” “request[ed]” its publication, “made a deliberate decision to publish her press release,” “actively participated” in “the decision to publish her press release,” was “active” in “influencing the media to publish” the statement, and “approved of” and “pushed for” the publication of the statement. Resp. 30-31. These argument-manufactured facts have no record support.

In applying the controlling law, plaintiff wittingly makes a mess of it. She disingenuously suggests any help Ms. Maxwell gave to help her lawyer prepare the January 2015 statement and her signing-off on it are the equivalent of requesting, authorizing and controlling its *republication*. That isn’t the law. The “authority” required for republication liability is the “actual authority . . . to *decide upon or implement*” the republication. 580 F.Supp. at 1095

(emphasis supplied; citing *Rinaldi*, 420 N.E.2d at 382). Judge Sofaer studied *Rinaldi*'s holding, and noted republication liability must be based on a "decision" by the defendant to republish and must focus on "real authority to influence the final product, *not upon evidence of acquiescence or peripheral involvement in the republication process.*" *Id.* at 1096 (emphasis supplied).

Accordingly, Judge Sofaer held, when there is "conclusive evidence of lack of actual authority" this is "dispositive" of republication liability and the trial court "'ha[s] no option but to dismiss the case against the [defendant].'" *Id.* (emphasis supplied; quoting *Rinaldi*, 420 N.E.2d at 382).

There is no evidence Ms. Maxwell "paid money to her publicist to convince" the media to publish her statement; this is why plaintiff cites no evidence to support that assertion. *See* Resp. 30. Mr. Gow's email containing the statement says nothing to "convince" the media to publish the statement. *See* Doc.542-6, Ex.F. There is no evidence Ms. Maxwell was "active" in "influencing the media to publish" it; nor is there any evidence she "pushed for" or "requested" its publication; this is why plaintiff cites no evidence to support these assertions. *See id.* 31.

Indeed, plaintiff has zero evidence Ms. Maxwell or her agents ever did anything to urge or request any media to publish the statement. Mr. Gow presented the January 2015 statement via email to six to thirty media representatives; it was not sent to anyone else; in the email he told the journalists he was presenting a "quotable statement" "on behalf of" Ms. Maxwell and "[n]o further communication will be provided." Doc.542-6, Ex.F. It is undisputed Ms. Maxwell and her agents had no control over the media that republished portions of the statement. Doc.542-7, 542-7, Ex.J ¶¶ 2-3; *id.*, Ex.K ¶ 24.

Plaintiff argues "a jury" should decide whether Ms. Maxwell "authorized or intended" the statement to be republished, or "approved of, and even participated, in" its republication. Resp. 30-31. All plaintiffs want to get to "a jury." The summary-judgment question is whether they deserve to. Plaintiff has offered no evidence to put before a jury on the dispositive *Geraci*

question: whether Ms. Maxwell affirmatively authorized or requested a person or entity “over whom [s]he has . . . control,” 938 N.E.2d at 921. The only new argument plaintiff makes in her entreaty to see “a jury” is that she should be permitted to prove Ms. Maxwell’s “complicity.” As with her other factually bereft arguments, the complicity argument awaits plaintiff’s introduction of facts to support it. Having failed to do so, plaintiff cannot avoid summary judgment.

Plaintiff labors in vain to turn the Barden Declaration into “disputed issues of fact.” For there to be a disputed factual issue, plaintiff would need to introduce evidence disputing his sworn statements. She has not done so. In any event, the Barden Declaration is all but irrelevant to the central, dispositive republication question: whether Ms. Maxwell is liable for the media’s republication of her statement, where they did so without her authority or request and where she and her agents had “no control”⁶ over the media. On this question we cited to the Barden Declaration for one evidentiary fact: Messrs. Barden and Gow had no control over the media.⁷ See Doc.542-7, Ex.K ¶ 24, *cited in* Memo. of Law 14.⁸ Plaintiff has offered no admissible evidence disputing this fact.

“[T]here is no issue for trial unless there is sufficient evidence favoring the nonmoving party for a jury to return a verdict for that party.” *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 249 (1986). It is one thing to argue in conclusory fashion, as plaintiff does, that “a jury” should decide a factual question. It is quite another to identify evidence in the Rule 56 record that raises a genuine question of material fact, which plaintiff does not do. Summary judgment is warranted.

⁶*Geraci*, 938 N.E.2d at 921.

⁷As discussed in Argument I.D., below, we cited more plenarily to the Barden Declaration in connection with a different point—the particular unfairness of subjecting Ms. Maxwell to liability when the media selectively quoted portions of the January 15 statement.

⁸In the Memorandum, we erroneously cited to ¶ 24 of Exhibit J; we intended to cite to ¶ 24 of Exhibit K (Doc.542-1, Ex.K), which is Mr. Barden’s declaration.

D. Subjecting Ms. Maxwell to liability for the media's republication of excerpts they unilaterally selected is particularly unfair.

It is undisputed that no one ever republished *in toto* the January 2015 statement and that various media unilaterally selected portions of the statement to republish. We said on page 14 of our Memorandum that the media's "selective, partial republication of the statement is *more problematic yet*" (emphasis altered). That is to say, as improper as it is to hold a publisher of a statement liable for republications over which she had no control, worse is it to make her liable for selective, partial republications of her statement. We relied on the holding in *Rand v. New York Times Co.*, 430 N.Y.S.2d 271, 275 (1st Dep't 1980), that a publisher cannot be charged with a republisher's "editing and excerpting of her statement." Memo. of Law 14.

Plaintiff argues that our position is "absurd on its face" because "[i]t would mean . . . a defamer could send to the media a long attack on a victim with one irrelevant sentence and, when the media quite predictably cut that sentence, escape liability." Resp. 32. This argument has two erroneous assumptions. One is that the "defamer" can "escape liability." Not true. An original publisher remains liable for her defamation. We are concerned here with *republication*. The second wrong assumption is that the original publisher must always remain liable for any republication. *Geraci* rejects that view: Under New York law "each person who repeats the defamatory statement is responsible for the resulting damages." 938 N.E.2d at 921.

The effort by plaintiff to distinguish *Rand* is meritless. She argues the media's republication of the January 2015 statement actually was not a republication at all, just an original publication. Resp. 32. *That* argument is "absurd on its face," *id.*, since there is no dispute Ms. Maxwell did not control the media's decision to republish (excerpts from) the statement. Plaintiff next argues the media did not "edit[]" or "tak[e] . . . quote[s] out of context." *Id.* Plaintiff could not be more wrong. As she concedes, all republications of the statement by the

media were selective, partial republications of the statement. Any such selective, partial republication by definition took those excerpts “out of context.” This is so because Mr. Gow informed the media in his email that he was providing “a quotable statement,” Doc.542-6, Ex.F, not a statement “from which you, the media, are free to excerpt as you please.”

More importantly, as Mr. Barden explained, selectively excerpting the statement substantially altered his message. *See id.*, Ex.K ¶ 20. For example, when he said in the third paragraph that plaintiff’s claims are “obvious lies,” it followed two paragraphs in which he explained *why* it was obvious the new claims are lies. *See id.*, Ex.K ¶¶ 19-22. Excerpting and republishing only the “obvious lies” phrase—as plaintiff did in her complaint—certainly gives the reader a different understanding than if the media had republished the entire statement. As *Rand* held: A defendant cannot be liable for the republication of derogatory but constitutionally protected opinion “when the foundation upon which that opinion is based is omitted. The defamatory remark should be read against the background of its issuance.” 430 N.Y.S.2d at 275 (internal quotations omitted).

Plaintiff argues: “A jury could reasonably conclude that [Ms. Maxwell’s] statement that Ms. Giuffre’s *claims of child sexual abuse* are ‘obvious lies’ is not a rhetorical device, nor hyperbole, but a literal and particular affirmation that [plaintiff] lied.” Resp. 33 (emphasis supplied). We italicize plaintiff’s rhetorical sleight of hand. As plaintiff knows, nowhere did the January 2015 statement specify which of plaintiff’s countless allegations are “obvious lies.” Indeed, this is the problem with plaintiff’s case: since the statement specified no particular allegations as obvious lies, plaintiff believes she is entitled to “prove” the truth of every allegation she ever has made about her alleged experience as a “sex slave.” What Mr. Barden’s declaration makes clear is he deliberately made no reference to any specific allegation by plaintiff. He had a bigger target: plaintiff’s credibility. He used the statement to show plaintiff’s

behavior is that of a liar, i.e., one who increasingly embellishes her story, and her allegations become more and more outlandish, so that by January 2015 she was claiming to have had sex with a well respected Harvard law professor, Alan Dershowitz. *See* Doc.542-7, Ex.K ¶¶ 19-22.

Contrary to plaintiff’s argument, “even apparent statements of fact may assume the character of statements of opinion, and thus be privileged, when made in public debate . . . or other circumstances in which an audience may anticipate the use of epithets, fiery rhetoric or hyperbole.” *Steinhilber v. Alphonse*, 501 N.E.2d 550, 556 (N.Y. 1986) (internal quotations and brackets omitted). That was the case here. Plaintiff falsely—and, as Judge Marra held, “unnecessar[ily]”⁹—alleged in lurid detail that Ms. Maxwell had sexually abused her. The six to thirty journalists would have anticipated a “fiery” denial of the allegations. Regardless, the statement overall was constitutionally protected opinion grounded on facts disclosed to the journalists: plaintiff’s increasingly outlandish and inconsistent stories, her newly embellished allegations, and her increasingly lurid and salacious enhancements of her earlier allegations.

E. Mr. Barden’s declaration is perfectly proper.

Plaintiff makes a plethora of complaints about Mr. Barden’s declarations. None has any merit. She objects to Mr. Barden’s declaration of his intent and purposes for preparing the January 2015 statement because, she says, this implicates the attorney-client privilege. That is untrue. His intent and purposes are by definition *not* attorney-client communications and do not implicate such communications; they are attorney work product,¹⁰ which he is free to disclose.¹¹

⁹Doc.542-5, Ex.E, at 5.

¹⁰*Travelers Indem. Co. v. Northrop Grumman Corp.*, No. 12 CIV. 3040 KBF, 2013 WL 3055437, at *3 (S.D.N.Y. Apr. 22, 2013) (identifying work product as including defense counsel’s “mental impressions, thought processes and strategies connected with [the] defense”).

¹¹*See In re China Med. Techs., Inc.*, 539 B.R. 643, 658 (S.D.N.Y. 2015)

She objects he is “non-deposed.” But Mr. Barden was the third-listed potential witness in our Rule 26(a)(1)(A) disclosure, served on plaintiff a year ago; the disclosure said he “has knowledge concerning press statements by . . . Defendant in 2011-2015 at issue in this matter.”¹² Plaintiff was free to depose him; that she chose not to was her own tactical decision. Finally, plaintiff argues “there are factual disputes” regarding the declaration. But plaintiff identified no such factual disputes relating to the declaration. A party opposing summary judgment cannot create a dispute by arguing, which is all plaintiff does. *See* Resp. 35-38.

F. Plaintiff effectively has confessed Arguments I.B. and I.C. of the Memorandum.

Argument I.B. of the Memorandum contends the First Amendment bars liability for republication by media organizations of the January 2015 statement. *See* Memo. of Law 16-17. Argument I.C. contends that under *Geraci* plaintiff is barred from introducing into evidence any of the media organizations’ republication of the January 2015 statement. *See id.* at 17-18. Plaintiff offers no resistance to these arguments. We respectfully request that the Court consider these arguments confessed. *See, e.g., Cowan v. City of Mount Vernon*, 95 F. Supp. 3d 624, 645-46 (S.D.N.Y. 2015) (citing cases).

II. The January 2015 statement is constitutionally protected opinion.

In deciding whether a statement is opinion the New York Constitution requires application of “the widely used four-part *Ollman*^[13] formula,” *Immuno AG v. Moor-Jankowski*, 567 N.E.2d 1270, 1274 (N.Y. 1991). *See id.* at 1274, 1277-78, 1280-82 (noting *Steinhilber*’s adoption of formula). We addressed each of the four *Ollman* factors. The plaintiff avoids this analysis, choosing merely to block-quote large portions of this Court’s Rule 12(b)(6) order. That

¹²Menninger Decl. EXHIBIT NN, at 2.

¹³*Ollman v. Evans*, 750 F.2d 970 (D.C. Cir. 1984).

is a mistake. *Immuno AG* is the seminal case prescribing the analysis to be used in a *summary-judgment proceeding* for assessing whether under the New York Constitution a statement is absolutely protected as opinion.

Instead of addressing the four factors, plaintiff simply relies on this Court's 12(b)(6) order. The Court's order does not control. In deciding the Rule 12(b)(6) motion, the Court assumed the complaint's allegations were true and drew all reasonable inferences in plaintiff's favor. In this proceeding, plaintiff is not entitled either to the assumption or the inferences. The opinion-versus-fact question will be controlled by the Rule 56 record.

Relying on the Court's order, plaintiff argues that the question whether the three allegedly defamatory sentences are opinion or fact is controlled by *Davis v. Boenheim*, 22 N.E.3d 999 (N.Y. 2014), and *Green v. Cosby*, 138 F. Supp. 3d 114 (D. Mass. 2015). *See* Resp. 38. *Davis* was an appeal from a 12(b)(6) dismissal. This procedural posture was critical to its decision:

[D]efendants argue that because a reader could interpret the statement as pure opinion, the statement is as a consequence, nonactionable and was properly dismissed [pursuant to a pre-answer motion]. However, on a motion to dismiss we consider whether any reading of the complaint supports the defamation claim. Thus, although it may well be that the challenged statements are subject to defendants' interpretation, the motion to dismiss must be denied if the communication at issue, taking the words in their ordinary meaning and in context, is also susceptible to a defamatory connotation. We find this complaint to meet this minimum pleading requirement.

Davis, 22 N.E.3d at 1006-07 (internal quotations, brackets, ellipsis and citations omitted).

Green was a decision on the defendant's motion to dismiss. The case was decided under *California* and *Florida* defamation law. *See* 138 F. Supp. 3d at 124, 130, 136-37. The court made it clear the 12(b)(6) procedural posture was critical to its decision: "At this stage of the litigation, the court's concern is whether any fact contained in or implied by an allegedly defamatory statement is susceptible to being proved true or false; if so capable, Defendant cannot avoid application of defamation law by claiming the statement expresses only opinion." *Id.* at 130.

In the case at bar, application of the four *Steinhilber* factors on the Rule 56 record compels a different conclusion. The complaint alleges three sentences in the January 2015 statement are defamatory: in the first paragraph of the statement, plaintiff Giuffre's allegations are "untrue"; in the same paragraph, the "original allegations" have been "shown to be untrue"; and in the third paragraph, plaintiff's "claims are obvious lies."¹⁴ Doc.1 ¶ 30.

Factor 1: Indefiniteness and ambiguity. On the face of the complaint in a 12(b)(6) proceeding, the words "untrue" and "obvious lies" might be susceptible of "a specific and readily understood factual meaning," Doc.37 at 9. This is especially true if it is taken out of context, e.g., extracted from the statement. But this approach is forbidden. *See, e.g., Law Firm of Daniel P. Foster, P.C. v. Turner Broad. Sys.*, 844 F.2d 955, 959 (2d Cir. 1988).

The first sentence—"[t]he allegations made by [plaintiff] against [Ms. Maxwell] are untrue"—is indefinite and ambiguous because it is wholly unclear which "allegations" are being referenced. The second sentence—"[t]he original allegations . . . have been fully responded to and shown to be untrue"—also is indefinite and ambiguous for the same reason. Additionally, it is unclear what are the "original" allegations. It is unclear what is meant by "shown to be untrue." What one person may believe is a fact shown to be untrue, another person may believe is a fact not (sufficiently) shown to be untrue. The existence of God, climate change and existence of widespread voter fraud in the election are examples of this. The third sentence—

¹⁴Ms. Maxwell testified in her deposition that she "know[s]" plaintiff is a "liar." This testimony, plaintiff argues, "contradict[s]" our contention that the three allegedly defamatory sentences in the July 2015 statement are opinion. Resp. 39-40. Plaintiff's argument is a *non-sequitur*. Ms. Maxwell's 2016 deposition testimony in which she disclosed all the reasons she believes plaintiff has uttered a plethora of false allegations is irrelevant to whether the three sentences in the July 2015 statement, prepared by Mr. Barden to respond to the joint-motion allegations, are opinions.

“[plaintiff’s] claims are obvious lies”—also is indefinite and ambiguous. An “obvious lie” to one person is not an “obvious lie” to another.

Factor 2: Capable of being characterized as true or false. On the 12(b)(6) record, the Court held the three statements “are capable of being proven true or false.” Doc.37 at 9. As a general question of law, one person’s statement that another person’s allegations are “untrue” or are “obvious lies” is not necessarily capable of being proved true or false—regardless of the subject matter of the opined “untruths” or “lies.” *See Rizzuto v. Nexxus Prod. Co.*, 641 F. Supp. 473, 481 (S.D.N.Y. 1986), *aff’d*, 810 F.2d 1161 (2d Cir. 1986); *Telephone Sys. Int’l v. Cecil*, No. 02 CV 9315(GBD), 2003 WL 22232908, at *2 (S.D.N.Y. Sept. 29, 2003); Memo. of Law 35 (citing cases). As *Steinhilber* observed, “even apparent statements of fact may assume the character of statements of opinion, and thus be privileged.” 501 N.E.2d at 556.

At least two of plaintiff’s CVRA allegations cannot be proven true or false (only two such allegations are needed in order to render the January 15 statement an opinion). We have identified two such allegations in the joinder motion: that Ms. Maxwell “appreciated the immunity granted” to Epstein, and that she “act[ed] as a ‘madame’ for Epstein.” Memo. of Law 22. Plaintiff does not dispute this. The result is that the January 15 statement’s assertion that plaintiff’s “allegations” and “claims” in the joint motion are “untrue” or “obvious lies” is by definition an opinion. It cannot be proven true or false whether Ms. Maxwell “appreciated” Epstein’s immunity or whether she “acted as a madame.” Indeed, it seems quite obvious that the joinder-motion allegations about “appreciation” and “madame” *are themselves opinion*.

In the statement, Mr. Barden on behalf of Ms. Maxwell also says plaintiff’s “original allegations . . . have been fully responded to and shown to be untrue.” Doc.542-6, Ex.F. This cannot be proven true or false. The “full response” to the original allegations is a reference to the “Statement on Behalf of Ghislaine Maxwell” issued March 9, 2011, in response to plaintiff’s

allegations contained in media stories, including the Churcher articles. *See* Doc.542-3, Ex.C. Whether the 2011 statement “fully” responded to the original allegations and whether it “showed” the original allegations to be untrue are pure (argumentative) opinion. “[O]bvious lies” on its face is an opinion. The “obviousness” of a lie simply cannot be proven true or false.

Factor 3: The full context of the statement. Three contextual facts are revealed by the Rule 56 record. **One**, the email transmitting the statement to the media-representatives—along with the third-person references to Ms. Maxwell—told them Ms. Maxwell did not prepare the statement: “Please find attached a quotable statement *on behalf of* Ms. Maxwell.” Doc.542-6, Ex.F (emphasis supplied). It is undisputed that in fact Mr. Barden prepared the bulk of it and ultimately approved and adopted as his work all of it. Doc.542-7, Ex.K ¶ 10.

Two, Mr. Barden’s statement issued on behalf of his client would not be a traditional press release solely to disseminate information to the media; this is why he did not request Mr. Gow or any other public relations specialist to prepare or participate in preparing the statement. *Id.*, Ex.K ¶ 15. The statement was a broad-brush communique to the media about plaintiff and her new allegations; it was not to be a “point by point” rebuttal of each new allegation. *Id.*, Ex.K ¶ 13. The logic and approach to preparing the statement were simple: compare plaintiff’s prior allegations and conduct in telling her story with her current allegations and conduct. *See generally id.*, Ex.K ¶ 13. When he wrote the statement, he knew of plaintiff’s 2011 allegation that she had *not* had sex with Prince Andrew and he knew of her CVRA allegation that she *did* have sex with him. *Id.*, Ex.K ¶ 14. Also within his knowledge was the story she had told Churcher before March 2011—a story that was far *less* provocative and salacious than the one she included in the joinder motion. *See id.*, Ex.K ¶ 5; *compare* Docs.542-1 & 542-2, Exs.A & B (Churcher articles published March 2011) *with* Doc.542-4, Ex.D (plaintiff’s joinder motion containing dramatically different and more lurid and salacious allegations).

Mr. Barden’s approach provides critical context to explaining how the statement builds a logical argument that the new allegations are false. It first notes plaintiff’s “original allegations”; then it points out how the story changed and was embellished over time, “now” with allegations that plaintiff had sex with a prominent and highly respected Harvard law professor (“Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders . . .”). The argument builds up to the opinion in the third paragraph: “[Plaintiff’s] claims are obvious lies and should be treated as such . . .” Doc.542-6, Ex.F. *See generally id.*, Ex.K ¶¶ 13-22. This third paragraph—and the threat in the fourth paragraph to sue the media for republication of plaintiff’s falsehoods—confirms what is plain from the statement itself: it was not a traditional press release.

Three, the statement was intended to respond (via denial) to the media-recipients’ requests for a reply to the new CVRA joinder-motion allegations. *Id.* ¶¶ 8, 10, 16. But more than that, it was intended to be “a shot across the bow” of the media. *Id.* ¶ 17. The logical argument was created to (a) persuade the media-recipients that they needed to “subject plaintiff’s allegations to inquiry and scrutiny”; (b) explain to the media-recipients how it was “obvious” that plaintiff “had no credibility” because of her shifting story and increasingly lurid and salacious allegations as time went on, many of which (e.g., the allegations of sex with Prince Andrew and Professor Dershowitz) on their face appear far-fetched,¹⁵ and (c) warn the media-

¹⁵Since the CVRA joinder motion, there has emerged a substantial amount of evidence—some from plaintiff’s own pen—that plaintiff’s allegations about having been “forced” to have sex with prominent individuals are falsehoods. A telling example is a series of emails between plaintiff and reporter Churcher when plaintiff was working on negotiating a book deal about her alleged experiences and Churcher was trying to help her. On May 10, 2011, plaintiff tells Churcher she cannot remember whom she had told Churcher she had had sex with. Churcher responds, “Don’t forget Alan Dershowitz,” which Churcher says is a “good name for [plaintiff’s] pitch” to her literary agent. It is clear neither Churcher nor plaintiff believed plaintiff

recipients that they republished plaintiff's obvious falsehoods against Ms. Maxwell at their legal peril. *See id.* ¶¶ 13, 16, 17, 20.

As the New York Court of Appeals observed, the context of a statement often is the “key consideration” in fact vs. opinion cases. *Davis*, 22 N.E.3d at 1006. So it is here. As *Davis* suggested, the three challenged statements are “subject to [Ms. Maxwell's] interpretation,” *id.* at 1007; *accord Sweeney v. Prisoners' Legal Servs. of N.Y.*, 538 N.Y.S.2d 370, 371-72 (3d Dep't 1989). The context of the January 2015 statement makes clear that the characterization of plaintiff's allegations and claims as “untrue” or “obvious lies” are ultimate opinions—conclusions—drawn from disclosed facts.

Factor 4: The broader setting surrounding the statement, including conventions that might signal to readers that the statement likely is opinion and not fact. It is undisputed that the January 2015 statement was sent exclusively to more than six and fewer than thirty media representatives, each of whom expressly had requested from Mr. Gow that he provide them with Ms. Maxwell's reply to the new joint-motion allegations. Doc.542-7, Ex.K ¶¶ 8, 10. As was obvious from the statement, it was not a traditional press release, as such a release does not explain—lawyer-like—why new allegations when measured against previous allegations lack credibility. Nor does a traditional release threaten to sue the media to whom the release is sent. The media representatives upon receiving the January 2015 statement would have understood it was presenting an (opinionated) argument that plaintiff was not credible because of her

had had sex with Professor Dershowitz, since (a) Churcher suggests that he would be a “good name” to “pitch” *because* of his prominence (“he [represented] Claus von Bulow and a movie was made about that case...title was Reversal of Fortune”), and (b) Churcher states, “We all *suspect* [Professor Dershowitz] is a pedo[phile] and tho *no proof of that*, you probably met him when he was hanging put w [Epstein].” Menninger Decl., EXHIBIT.OO, at Giuffre004096-97 (emphasis supplied).

inconsistent and shifting sex abuse story and her increasingly lurid allegations against more and more prominent individuals. And they would have understood that these characteristics of a storyteller undermine her credibility and *ergo* the credibility of her new allegations.

In its 12(b)(6) order the Court said the three sentences have the effect of denying plaintiff's story but "they also clearly constitute fact to the reader." The ruling is affected in two ways by the Rule 56 record. Based on the foregoing discussion of the evidence, the three sentences clearly constitute (argumentative) opinions of Mr. Barden on behalf of Ms. Maxwell.

Though the Court did not discuss who is "the reader," this is important in *Steinhilber* Factor 4." Under settled defamation-opinion law, an allegedly defamatory statement is to be viewed "from the perspective of the audience to whom it is addressed." *Dibella v. Hopkins*, No. 01 CIV. 11779 (DC), 2002 WL 31427362, at *2 (S.D.N.Y. Oct. 30, 2002). Here, "the reader" is six to thirty journalists. They could not have read the July 2015 statement—or the three allegedly defamatory sentences—the same way it was read by these journalists' audience, i.e., the general public. This is because, as plaintiff implicitly concedes, these journalists only republished excerpts—and not the entirety of the statement, which would have given context to the three sentences. It is axiomatic that an out-of-context republication of the three sentences—without the rest of the statement—would deprive the reader of the logic and reasoning behind the opinionated conclusion that plaintiff was making "untrue" allegations and telling "obvious lies."

III. The pre-litigation privilege bars this action.

A. The privilege applies to the January 2015 statement.

Statements pertinent to a good faith anticipated litigation made by attorneys (or their agents under their direction¹⁶) before the commencement of litigation are privileged and “no cause of action for defamation can be based on those statements,” *Front, Inc. v. Khalil*, 28 N.E.3d 15, 16 (N.Y. 2015). The facts that must be established, therefore, are (a) a statement, (b) that is pertinent to a good faith anticipated litigation, and (c) by attorneys or their agents under their direction. We did this. *See* Memo. of Law 6-8, 33-38; Doc.542-7, Ex.K ¶¶ 8-30. For example, Mr. Barden (a) drafted the vast majority of the January 2015 statement and approved and adopted all of it, (b) directed Mr. Gow to send it to the media representatives who had requested Ms. Maxwell’s reply to plaintiff’s joint-motion allegations, (c) in the statement threatened legal action against these media representatives, and (d) at the time of the statement “was contemplating litigation against the press-recipients.” *Id.*, Ex.K ¶¶ 10, 16-17, 28, 30.

Plaintiff argues without citation to authority: Ms. Maxwell herself did not testify she intended to sue; she hasn’t offered any witnesses to testify she intended to bring a lawsuit; she didn’t in fact sue; and—this one is a *non-sequitur*—the statement was an “attempt[] to continue to conceal her criminal acts.” Resp. 41-42. These arguments fail. The privilege exists without regard to whether *Ms. Maxwell* testifies she “intended” to sue, whether she has “witnesses” to say she intended to sue, or whether she “in fact” sued. It refers to “anticipated” litigation, not “guaranteed” litigation. Indeed, the point of the pre-litigation privilege is to promote communications that *avoid* litigation. *See Khalil*, 28 N.E.3d at 19 (“When litigation is

¹⁶*See Chambers v. Wells Fargo Bank, N.A.*, No. CV 15-6976 (JBS/JS), 2016 WL 3533998, at *8 (D.N.J. June 28, 2016); *see generally Hawkins v. Harris*, 661 A.2d 284, 289-91 (N.J. 1995).

anticipated, attorneys and parties should be free to communicate in order to reduce or avoid the need to actually commence litigation.”). It applies when there is a good faith basis to *anticipate* litigation. Mr. Barden, Ms. Maxwell’s lawyer who *drafted and caused the statement to be sent out*, actually was anticipating litigation. Doc.542-7, Ex.K ¶ 28. The argument that the statement was an attempt to “conceal” Ms. Maxwell’s “criminal acts” is fatuous. It would be hard to *post facto* “conceal” alleged criminal acts that plaintiff luridly and salaciously described in an earlier public filing, i.e., in the CVRA case, in which the United States government was the defendant.

Citing no record evidence, plaintiff argues, “The record evidence shows [Mr. Barden] did not make the [January 2015] statement.” Resp. 42. That argument is easily disposed of by Mr. Barden’s uncontested testimony. *See* Doc.542-7, Ex.K ¶¶ 10-13, 15-17, 20, 26-28, 30.

B. Malice is irrelevant to the pre-litigation privilege.

Citing the New York Court of Appeals’ decision in *Khalil*, we pointed out that malice is not relevant to the pre-litigation privilege. Memo. of Law 34-35. To prevail on the pre-litigation privilege the defendant need only establish one element: the allegedly defamatory statement at issue was “pertinent to a good faith anticipated litigation.” *Id.* (quoting *Khalil*, 28 N.E.3d at 16). Plaintiff disputes this and, without discussing *Khalil* or citing authorities, simply argues the pre-litigation privilege is “foreclosed . . . because [Ms. Maxwell] acted with malice.” Resp. 43. As suggested by her inability to find any law to support her, plaintiff is wrong.

Under general New York defamation law, “[t]he shield provided by a qualified privilege may be dissolved” if plaintiff in rebuttal can show that the defendant “spoke with ‘malice.’” *Lieberman v. Gelstein*, 605 N.E.2d 344, 349 (N.Y. 1992); *accord Khalil*, 28 N.E.3d at 19. “Malice” means two things: spite or ill will, and knowledge of falsity or reckless disregard of falsity. *Lieberman*, 605 N.E.2d at 349. Plaintiff relies on this general qualified-privilege law.

The problem for plaintiff is that in *Khalil* the New York Court of Appeals held this general rule does not apply to the pre-litigation privilege. Khalil worked for a company named Front. After eight years, he resigned and began working for “EOC,” one of Front’s competitors. Front’s lawyer Kimmel sent a demand letter to Khalil alleging he had committed criminal, tortious and ethical misconduct. Kimmel sent another demand letter to EOC and others stating Khalil had conspired with EOC to breach his fiduciary duty to Front. Six months later, Front sued Khalil. Khalil brought a third-party claim against Kimmel for libel *per se*. The trial court dismissed the lawsuit, ruling that the letters were “absolutely privileged” under the litigation privilege “and that it therefore did not need to reach the question of malice.” 28 N.E.3d at 17 (internal quotations omitted). The Appellate Division affirmed, holding that the litigation privilege absolutely protected the letter “because they were issued in the context of prospective litigation.” *Id.* at 18 (internal quotations omitted).

The Court of Appeals affirmed, but altered the law on the litigation privilege. It observed, “Although it is well-settled that statements made *in the course of litigation* are entitled to absolute privilege, this Court has not directly addressed whether statements made by an attorney on behalf of his or her client in connection with *prospective litigation* are privileged.” *Id.* (emphasis supplied). Some Appellate Division departments had held the absolute privilege applies to statements made in connection with prospective litigation, but other departments had held such statements were entitled only to a qualified privilege. *Id.*

The answer to whether pre-litigation statements should be absolute or qualified, the Court of Appeals held, is driven by the rationale for protecting pre-litigation statements:

When litigation is anticipated, attorneys and parties should be free to communicate in order to reduce or avoid the need to actually commence litigation. Attorneys often send cease and desist letters to avoid litigation. . . . Communication during this pre-litigation phase should be encouraged and not chilled by the possibility of being the basis for a defamation suit.

Id. at 19. However, the court recognized that “extending privileged status to communication made prior to anticipated litigation has the potential to be abused”; extending an absolute privilege to this context, the court said, “would be problematic and unnecessary.” *Id.*

The court held it would recognize only a qualified privilege for pre-litigation communications. *Id.* Crucially to the case at bar, the court held that the traditional privilege-rebuttal malice was *inapplicable* to the pre-litigation privilege:

Rather than applying the general malice standard to this pre-litigation stage, the privilege should only be applied to statements pertinent to a good faith anticipated litigation. This requirement ensures that privilege does not protect attorneys who are seeking to bully, harass, or intimidate their client’s adversaries by threatening baseless litigation or by asserting wholly unmeritorious claims, unsupported in law and fact, in violation of counsel’s ethical obligations. Therefore, we hold that statements made prior to the commencement of an anticipated litigation are privileged, and that the privilege is lost where a defendant proves that the statements were not pertinent to a good faith anticipated litigation.

Id. (emphasis supplied).

Accordingly, the only question is whether the January 2015 statement Mr. Barden caused to be issued to the six to thirty journalists was “pertinent to a good faith anticipated litigation.” The undisputed evidence establishes that the answer is yes. Mr. Barden anticipated litigation.¹⁷ He “fully complied with [his] ethical obligation as a lawyer.”¹⁸ He was hardly “bully[ing], harass[ing], or intimidat[ing]” the six to thirty journalists, since he caused a press agent, Mr.

¹⁷See Doc.542-7, Ex.K ¶ 28 (“At the time I directed the issuance of the statement, I was contemplating litigation against the press-recipients”); *id.* ¶ 17 (statement was intended as “a shot across the bow”; “the statement was very much intended as a cease and desist letter to the media-recipients, letting [them] understand the seriousness with which Ms. Maxwell considered the publication of plaintiff’s obviously false allegations and the legal indefensibility of their own conduct”); Doc.542-6, Ex.F (“Maxwell . . . reserves her right to seek redress”).

¹⁸Doc.542-7, Ex.K ¶ 26.

Gow, to issue the statement,¹⁹ and he believed he had an affirmative duty in representing Ms. Maxwell to prepare the statement and cause it to be delivered to the journalists.²⁰

Plaintiff argues that when Mr. Barden issued the January 2015 statement on Ms. Maxwell's behalf, he had only “wholly unmeritorious claims, *unsupported in law and fact*, in violation of counsel's ethical obligations” and did not have “good faith anticipated litigation.” Resp. 46 (quoting *Khalil*, 28 N.E.3d at 19; italics omitted). Plaintiff's rationale? Because she was telling the truth and so the media would only be reporting the truth. *Id.* That is a nonsensical, frivolous argument.

Whether Mr. Barden, who represents Ms. Maxwell, had a meritorious or good faith basis for anticipating defamation litigation has nothing to do with whether the media believed plaintiff was telling the truth, and surely not whether *the plaintiff* believed or said she was telling the truth. Based on his knowledge of plaintiff's history, Mr. Barden in good faith believed that plaintiff had been making false allegations for years and that the falsity of the allegations “should have been obvious to the media.” Doc.542-7, Ex.K ¶ 13; *see id.* ¶¶ 14, 16-17, 20-23, 26-28, 30. Accordingly, at the time he caused the statement to issue, Mr. Barden had a good-faith basis to anticipate litigation against any of the media that republished plaintiff's false allegations.

It hardly matters for purposes of the pre-litigation privilege whether the media republished or did not republish plaintiff's allegations or whether Mr. Barden ultimately did or did not sue any of the media for any republication. As the *Khalil* court recognized, “[a]ttorneys often send cease and desist letters to avoid litigation,” 28 N.E.3d at 19, and such letters have a

¹⁹The *Khalil* court admonished attorneys to “exercise caution when corresponding with unrepresented potential parties who may be particularly susceptible to harassment and unequipped to respond properly even to appropriate communications from an attorney.” *Khalil*, 28 N.E.3d at 19 n.2.

²⁰*See* Doc.542-7, Ex.K ¶ 26.

valid purpose protected by the pre-litigation privilege. Mr. Barden testified that the January 2015 statement in fact served as a cease and desist letter. *See* Doc.542-7, Ex.K ¶ 17.

IV. Ms. Maxwell's January 4, 2015, statement is nonactionable.

Plaintiff did not respond to our argument that Ms. Maxwell's January 4, 2015, statement to a reporter is nonactionable. *See* Memo. of Law 38-39. We respectfully submit plaintiff has confessed this point. *See Cowan*, 95 F. Supp. 3d at 645-46.

V. Summary judgment is warranted because plaintiff cannot establish falsity or actual malice by clear and convincing evidence.

Plaintiff is a public figure. *See* Memo. of Law 16-17, 49-54. Therefore, she must prove falsity and actual malice. Under New York law, a public-figure defamation plaintiff must go beyond the federal constitutional minimum and prove falsity by clear and convincing evidence. *Blair v. Inside Ed. Prods.*, 7 F. Supp. 3d 348, 358 & n.6 (S.D.N.Y. 2014) (citing *DiBella v. Hopkins*, 403 F.3d 102, 111 (2d Cir.2005)). She must also prove actual malice by clear and convincing evidence. *Karedes v. Ackerley Grp., Inc.*, 423 F.3d 107, 114 (2d Cir. 2005) (quoting *Phila. Newspapers v. Hepps*, 475 U.S. 767, 773 (1986)).

Clear and convincing evidence is evidence that “produces in the mind of the trier of fact a firm belief or conviction as to the truth of the allegations sought to be established, evidence so clear, direct and weighty and convincing as to enable the factfinder to come to a clear conviction, without hesitancy, of the truth of the precise facts in issue.” *Blair*, 7 F. Supp. 3d. at 358 (internal quotations and brackets omitted).

Plaintiff must prove by clear and convincing evidence (a) the material falsity of three sentences in the context of the January 2015 statement, and (b) Ms. Maxwell's actual malice, i.e., knowledge of the falsity of the three sentences or reckless disregard of whether they were false. The three sentences are: in the first paragraph of the statement, plaintiff's allegations are

“untrue”; in the same paragraph, the “original allegations” have been “shown to be untrue”; and in the third paragraph, plaintiff’s “claims are obvious lies.”²¹ Doc.1 ¶ 30.

Plaintiff cannot prove the falsity of the three sentences, let alone actual malice. If the Rule 56 record establishes that *two* of plaintiff’s CVRA joinder-motion allegations are false and *two* of her “original” allegations are false, this defamation action collapses on itself. This is because the statement does not specify how many of plaintiff’s allegations are false; it certainly does not say “all” plaintiff’s allegations are false. It uses the plural of “allegation.” The plural of allegation literally means “more than one.” *See* Memo. of Law 21.

Sentence No. 1. Since the sentence does not specify any particular allegation and since plaintiff made a plethora of allegations against Ms. Maxwell, plaintiff would be required to prove the truth of every one of the plethora of allegations *and* that Ms. Maxwell knew each one of the allegations was true. Conversely, if there are at least two allegations that plaintiff cannot prove to be true or if there was good reason for Ms. Maxwell to believe at least two of the allegations to be false, then summary judgment should enter against plaintiff.

There are at least two allegations by plaintiff against Ms. Maxwell that are untrue. In the CVRA joinder motion, plaintiff alleged that in plaintiff’s first encounter with Mr. Epstein, Ms. Maxwell took her to Mr. Epstein’s bedroom for a massage that Mr. Epstein and Ms. Maxwell “turned . . . into a sexual encounter,” Doc.542-4, Ex.D, at 3. This allegation contradicted her allegation in the Sharon Churcher article that a woman *other than* Ms. Maxwell

²¹Ms. Maxwell said in her deposition she “know[s]” plaintiff is a “liar.” This testimony, plaintiff argues, “contradict[s]” our contention that the three sentences in the January 2015 statement are opinion. Resp. 39-40. Plaintiff’s argument is a *non-sequitur*. Ms. Maxwell’s 2016 deposition testimony in which she disclosed all the reasons she believes plaintiff has uttered a plethora of false allegations is wholly irrelevant to whether the three sentences in the January 2015 statement, prepared by Mr. Barden to respond to the joint-motion allegations, are opinions.

took her to Mr. Epstein's bedroom; during the massage *that* woman gave instructions to plaintiff, and the massage "quickly developed into a sexual encounter." Doc.542-1, Ex.A, at 4.

A second allegation pertaining to plaintiff's entire story about Ms. Maxwell's introduction of plaintiff to Prince Andrew is untrue. In the joinder motion, plaintiff alleged Ms. Maxwell served an "important . . . role" in "Epstein's sexual abuse ring," namely, connecting Mr. Epstein to "powerful individuals" who would sexually abuse plaintiff. *Id.*, Ex.D, at 5. Plaintiff alleged that in this role Ms. Maxwell introduced plaintiff to Prince Andrew, and she was "forced to have sexual relations with this Prince in three separate geographical locations," including Ms. Maxwell's London apartment. *Id.*, Ex.D, at 5. These allegations directly contradicted her earlier allegations in the 2011 Churcher article that (a) there never was "any sexual contact between [plaintiff] and [Prince] Andrew," and (b) Prince Andrew did not know "Epstein paid her to have sex with [Epstein's] friends." *Id.*, Ex.A, at 6.

Mr. Barden on behalf of Ms. Maxwell said in the first sentence that plaintiff's "allegations"—plural—against Ms. Maxwell are "untrue." We have just established through plaintiff's own contradictory words that it would be fair to characterize at least two of her allegations to be untrue. Having spent significant time with Ms. Churcher in 2011 and having substantial incentive to disclose all important details of her "sex abuse" story, *see* Menninger Decl. EXHIBIT OO, plaintiff in 2011 presented a story that exculpated Ms. Maxwell and Prince Andrew of the very misconduct that in 2015—after securing a lawyer and seeing her story as a profit vehicle—she inculpated them for. In the face of her contradictory allegations, plaintiff cannot possibly prove by clear and convincing evidence that all her joinder-motion allegations are true, or that when Ms. Maxwell said they were untrue, she knew each one of the allegations was true or that she recklessly disregarded whether each one was true.

Under New York law, a defendant's allegedly defamatory statement is held "to a standard of substantial, not literal, accuracy." *Law Firm of Daniel P. Foster*, 844 F.2d at 959. Here, Ms. Maxwell's first sentence *literally* is true: more than one of plaintiff's allegations are "untrue." Accordingly, there is no defamation.

Sentence No. 2. The second sentence at issue in this action states, "The original allegations are not new and have been fully responded to and shown to be untrue." Plaintiff alleges the sentence is defamatory to the extent it asserts the original allegations were "shown to be untrue." Doc.1 ¶ 30. Plaintiff cannot prove this statement's falsity.

It is a matter of pure opinion whether any given allegation was "shown" to be untrue. Some people require more proof than others to conclude that a fact has been "shown to be untrue." We discussed above various examples of this, e.g., climate change. Here, Ms. Maxwell via Mr. Barden in March 2011 issued a statement denying plaintiff's Churcher-story allegations as "all entirely false." Doc.542-3, Ex.C. Plaintiff did not respond to this statement, let alone claim it was defamatory. Her non-response reasonably could be seen as a concession that Ms. Maxwell's denial was righteous. *See* Doc.542-7, Ex.K (Mr. Barden: "I would have been remiss if I had sat back and not issued a denial, and the press had published that Ms. Maxwell had not responded to enquiries and had not denied the new allegations; the public might have taken the silence as an admission there was some truth in the in allegations.").

Regardless, we easily can show two of plaintiff's original allegations are untrue. Many of plaintiff's original allegations are contained in the two Churcher articles, Docs.542-1 & 542-2, Exs.A & B. The articles contained numerous allegations by plaintiff relating to her alleged sexual abuse. In her deposition, plaintiff was shown Deposition Exhibit 7, a collection of some of her allegations in the articles. Plaintiff placed checkmarks by those allegations she admitted—over the course of 20 pages of testimony—were not true. *See* Menninger Decl. EXHIBIT PP, at

435:7-455:6 & Depo. Ex.7. These include her claims that: (1) she was 17 when she flew to the Caribbean with Mr. Epstein and Ms. Maxwell “went to pick up Bill in a huge black helicopter,” referring to former President Bill Clinton; (2) her conversation with Mr. Clinton about Ms. Maxwell’s pilot skills; and (3) Donald Trump was a “good friend” of Mr. Epstein’s and “flirted with me”.

Plaintiff’s admissions on the falsity of her original allegations are fatal to her defamation claim as to the second sentence. The eleven admittedly false “original allegations” axiomatically would warrant the second sentence. Plaintiff has no possible way to prove the second sentence is false. Indeed, like Ms. Maxwell’s first sentence, the second sentence literally is true: more than one of plaintiff’s original allegations are untrue. A statement that literally is true cannot be defamatory as a matter of law. *See Law Firm of Daniel P. Foster*, 844 F.2d at 959.

Sentence No. 3. Defamation as to the third sentence is foreclosed. To begin with, as discussed above, whether plaintiff has uttered “obvious lies” is a matter of opinion: in the face of plaintiff’s gratuitous and lurid allegations of Ms. Maxwell’s years-long participation at the center of a child sex-trafficking ring, for the journalists-recipients of the July 2015 statement the phrase was an anticipated “epithet[, fiery rhetoric or hyperbole,” *Steinhilber*, 501 N.E.2d at 556 (internal quotations omitted); *see Tel. Sys. Int’l*, 2003 WL 22232908, at *2 (observing Court’s previous holding in *Rizzuto* that defendants’ use of phrases “conned,” “rip off” and “lying” in advertisements were not actionable as libel and were “rhetorical hyperbole, a vigorous epithet used by those who considered themselves unfairly treated and sought to bring what they alleged were the true facts to the readers”) (internal quotations omitted).

Even if *arguendo* the third sentence—plaintiff’s “claims are obvious lies”—cannot be considered opinion, the Rule 56 record forecloses a defamation claim. The sentence does not specify which of plaintiff’s “claims,” i.e., allegations, are obvious lies. It could refer to the

“original” claims; the “new,” CVRA claims; the claims against Ms. Maxwell; the claims against anyone, including Professor Dershowitz, who was mentioned in the preceding sentence; or any two or more of all the claims plaintiff ever had made about her alleged experiences as the alleged victim of a child sex-trafficking ring.

Regardless of what is being referred to, there is no defamation. As demonstrated in the discussion above of the first and second sentences, the Rule 56 record establishes that at least two of plaintiff’s “original” allegations are untrue, at least two of her CVRA allegations are untrue, at least two of her allegations against Ms. Maxwell are untrue, at least two of her allegations against anyone (e.g., Ms. Maxwell, Prince Andrew or Professor Dershowitz) are untrue, and at least two of her allegations about her alleged sex-trafficking experiences are untrue. Moreover, the untruthfulness—the falsity—of the allegations certainly is “obvious.” After all, plaintiff herself admitted under oath that a multitude of her original allegations are untrue, and she implicitly admitted some of her CVRA allegations are untrue because they were contradicted by her original allegations.

CONCLUSION

The Court should grant summary judgment in favor of Ms. Maxwell.

February 10, 2017.

Respectfully submitted,

s/ Laura A. Menninger

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CERTIFICATE OF SERVICE

I certify that on February 10, 2017, I electronically served this *Reply Brief in Support of Defendant's Motion for Summary Judgment* via ECF on the following:

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Prince Andrew and the 17-year-old girl his sex offender friend flew to Britain to meet him

By SHARON CHURCHER
UPDATED: 08:02 EST, 2 March 2011

101

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- Virginia Roberts reveals she is 'Jane Doe 102' in Jeffrey Epstein case
- Mother-of-three spent four years as millionaire's personal masseuse
- She describes being flown across world to meet Prince Andrew
- Epstein trained her 'as a prostitute for him and his friends'

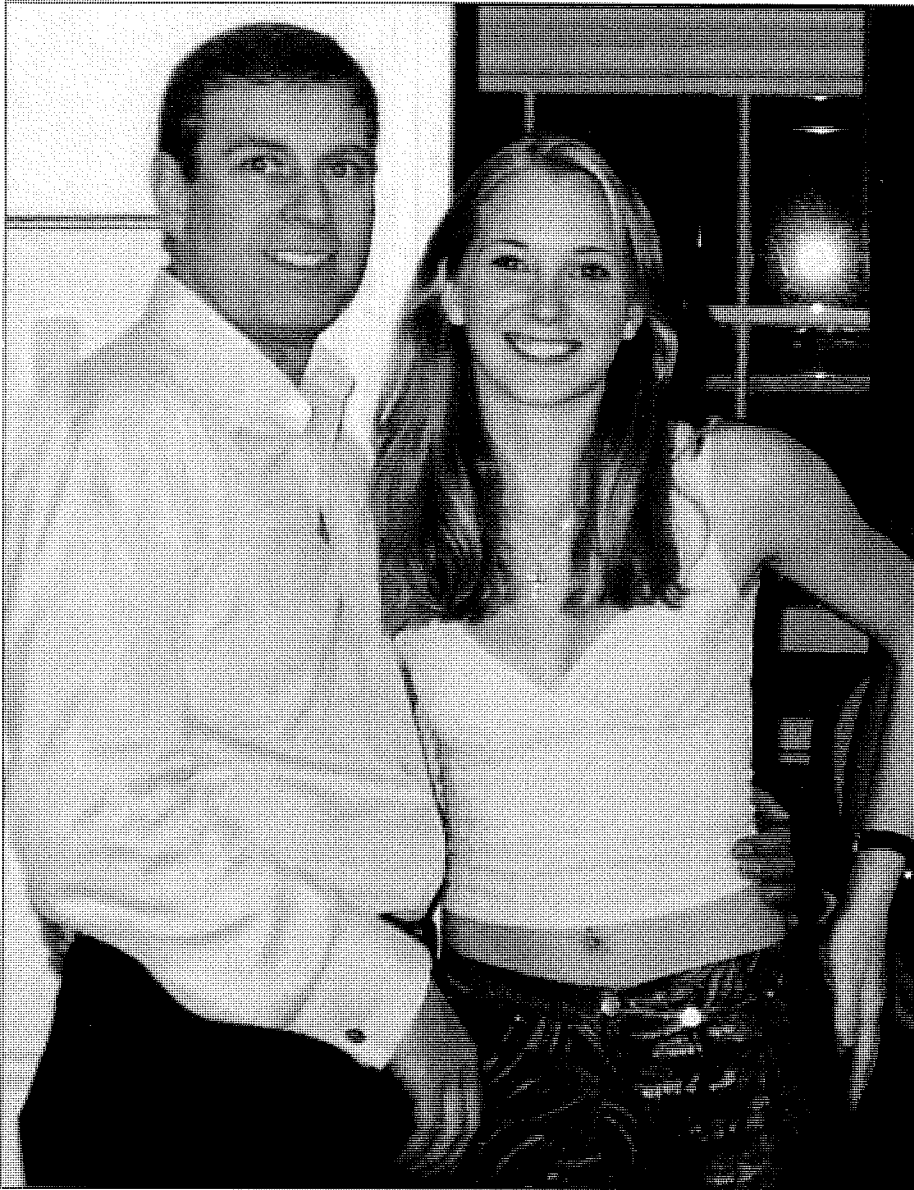
As the UK's special representative for international trade, the Duke of York holds an important position, requiring sound judgement and widespread respect.

But those qualities have been thrown into question since photographs of Prince Andrew with his billionaire financier friend Jeffrey Epstein, a convicted child-sex offender who was jailed for 18 months for soliciting underage prostitutes, appeared last weekend.

Today, however, even more serious doubts are cast on his suitability after a woman at the centre of the Epstein case revealed to The Mail on Sunday that she had, as a 17-year-old employed by Epstein, been flown across the world to be introduced to the Prince.

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First meeting: Prince Andrew puts his arms around 17-year-old Virginia, centre

On one of those occasions Virginia Roberts was subsequently paid \$15,000 (£9,400). Her shocking account of her four years as Epstein's personal masseuse is supported by court documents, an eyewitness, photographs and flight details of Epstein's private jets.

One picture, said to have been taken by Epstein during Andrew's first encounter with the girl in March 2001 and published today by The Mail on Sunday, shows the Prince with his arm around her waist.

This is not the first time the Duke of York's judgment and choice of associates have been questioned. He appears to relish the company of super-rich oil billionaires from the Middle East, North Africa and the former Soviet Union.

The peculiar sale of his former marital home to a Kazakh businessman for £15 million after it had languished unsold for five years at £12 million has never been satisfactorily explained.

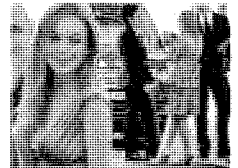
In the recent leak of American diplomatic cables it was revealed that he had criticised an official corruption investigation into the huge Al-Yamamah arms deal between Britain and Saudi Arabia, while he is also said to be close to Saif Al-Islam Gaddafi, son of the beleaguered Libyan president, and may have had a role in the early release of Lockerbie bomber Abdelbaset Al Megrahi.

But it is Andrew's friendship with Epstein, whom he has known since at least 2000, and with Epstein's confidante Ghislaine Maxwell, daughter of the late disgraced newspaper baron Robert Maxwell, that gives most concern.

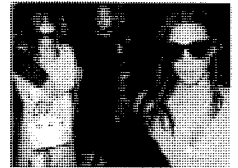
He was first seen with the pair on holiday in Thailand, and was pictured cavorting with Ghislaine at a Halloween fetish-themed party in

While on the streets, I slept with men for money. I was a paedophile's dream

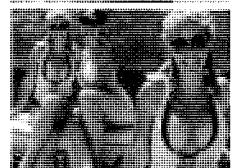
Lindsay Lohan flashes her cleavage in a low-cut lilac number as she enjoys romantic day in Zurich with fiancé Egor Tarabasov
Lovely in lilac



Back in time to celebrate! Kim Kardashian and Kanye West arrive in LA on eve of daughter North's third birthday
Whirlwind 24-hour trip



Bathing suit babes! Playboy vet Kendra Wilkinson shows off chest in one piece while celebrating 31st birthday with 'number one ho' in Arizona



Sean Penn's son Hopper, 22, reveals his famous father wanted to name him 'Steak' due to his love of red meat
His mom Robin Wright wouldn't have gone for it



New romance for Ruby? Rose 'dating' businesswoman Harley Gusman after the pair were spotted cozying up on a date in Hollywood
Off the market?



Was Patrick Swayze a victim of domestic abuse? Wife denies claims she beat the Dirty Dancing star throughout their 34-year marriage - and even when he was dying



Advertisement

6/14/2016

Manhattan.

The photograph that appeared last weekend shows the prince strolling through Central Park with 58-year-old Epstein. Andrew was said to have spent four days at his New York mansion in December, when he was joined by other distinguished guests, including Woody Allen, at a dinner.

It is by no means the first New York soiree Andrew has attended as Epstein's guest.

A lengthy profile of the financier in Vanity Fair magazine some years ago reported that Andrew was a guest at a cocktail party thrown by Epstein and Maxwell packed with young Russian models. 'Some guests were horrified,' said the article's author, Vicky Ward.

It should not be forgotten that Epstein is a registered sex offender after recently completing his sentence for offences relating to child prostitution.

However, he avoided trial on more serious charges that carried a potential life sentence. And no one reading The Mail on Sunday's interview with the woman who was prepared to testify against him can be in any doubt of the seriousness of the charges.

Epstein, a Wall Street money manager who once counted Bill Clinton and Donald Trump among his friends, became the subject of an undercover investigation in 2005 after the stepmother of a 14-year old girl claimed she was paid \$200 (£125) to give him an 'erotic massage'.

The subsequent FBI probe uncovered at least 20 girls levelling sexual allegations against him. Eventually, Epstein struck a 'plea bargain' with prosecutors – a practice not permitted under British law – under which he was allowed to plead guilty to two relatively minor charges.

Police claim that his donations to politicians and his 'dream team' of influential lawyers deterred prosecutors from bringing more serious charges of sex-trafficking. The deal certainly kept the names of a lot of Epstein's famous friends out of an embarrassing court case.

However, an unusual part of the agreement was that Epstein's alleged victims were allowed to bring civil proceedings against him.

He has so far made 17 out-of-court settlements, and some cases are ongoing. One of these girls was to have been a key witness for the prosecution had the case gone to trial. She was just 15 years old when she was drawn into Epstein's exploitative world in 1998.

In her civil writ against him, under the pseudonym Jane Doe 102' she alleged that her duties included being 'sexually exploited by Epstein's adult male peers including royalty'.

Now, horrified by the evidence of Epstein and Andrew enjoying each other's company in New York, Jane Doe 102 has agreed to waive her anonymity and tell for the first time her deeply disturbing story.

Her real name is Virginia Roberts and she now lives in Australia, where she is a happily married mother of three.

Over the course of a week during which she spoke at length to The Mail on Sunday, she appeared sometimes vulnerable, and sometimes steely, but always quietly resolute and consistent.

Revisiting events from a past that she had hoped she had left behind, Virginia occasionally buried her face in her hands.

Some recollections – and, for reasons of taste, not all the details can be included here – caused her to flush with shame. 'I'm telling you things that even my husband didn't know,' she said.

Virginia, who has undergone counselling to try to come to terms with her past, is honest about her initiation into Epstein's depraved world.

She was a troubled teenager, whose slender figure, delicate complexion, hesitant voice and soulful blue eyes made her look young for her years.

Born in Sacramento, California, in August 1983, Virginia spent her early years on a small ranch on the West Coast of America.

This seemingly idyllic childhood ended when she was sexually molested by a man close to her family.

The fallout from that led to her parents temporarily splitting up. Blaming herself, Virginia began to get into trouble. Aged 11, she was sent to live with an aunt but repeatedly ran away.

Living on the streets, she was beaten up and slept with at least two older men in return for food. 'I was a paedophile's dream,' she says.

Three years later, she was reunited with her family and started a new life with her father who had moved to Palm Beach,

Florida, where he was maintenance manager at Donald Trump's country club, Mar-a-Lago.

Virginia got a part-time job as a changing room assistant – which is where, soon after her 15th birthday, she met Ghislaine Maxwell, who invited her to work as Epstein's personal masseuse.

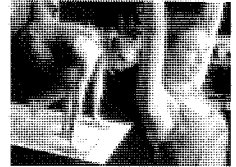
'I was wearing my uniform – a white miniskirt and a skin-tight white polo top – when I was approached by Ghislaine,' Virginia says.

'I told her I wanted to become a masseuse and she said she worked for a very wealthy gentleman who was looking for a travelling masseuse.

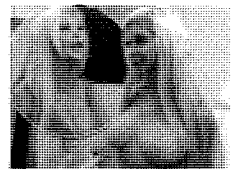
I'd get training and be paid well.' Virginia's father gave his blessing, believing his daughter was being handed the opportunity to learn a skill and to work for a wealthy and respectable employer.

He drove her to Epstein's pink mansion on the Palm Beach waterfront – he also owns a nine-storey home in New York, the city's biggest private residence; a 7,500-acre ranch called 'Zorro' in New

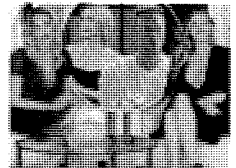
'Need a tight tush': LeAnn Rimes illustrates how to get a firm 'booty' as she does yoga in skimpy tank top and leggings
Exercise tips



'I want them really big!' Blonde bombshell begs doctors to make her 1,000cc implants – even after they insist her enhanced breasts are 'perfect'
On Botched



'It's my fourth favorite reality show! Jessica Alba and Kate Hudson are mean girls as Chris Martin plays for laughs in Sara and Erin Foster's Barely Famous



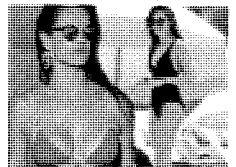
'He's turned into an absolute jerk:' Former Celebrity Apprentice star Vivica A. Fox slams Donald Trump... but says he's not a racist
She's no longer a fan



'I don't see a dark past anymore': Paris Jackson reveals tattoos have helped cover her 'scars and self-hatred' in moving Instagram post



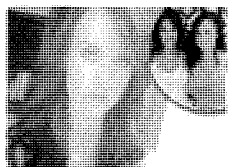
How the season's hottest beach babes including Hailey Steinfeld and Kendall Jenner are embracing jewelry at the seashore
Chic on the beach



This old thing! Duchess of Cambridge recycles a TEN-year-old brocade coat as she plants a tree at garden party
From the back of her wardrobe



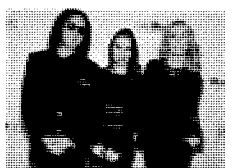
EXCLUSIVE: Alexa Curtin, daughter of Real Housewives star Lynne, is charged with drug possession two months after accusing O.C. deputy sheriff of raping her during a traffic stop



'I told my mom she's a grandma': Maria Menounos shared excitement about her frozen embryos in poignant IVF interview... given before negative pregnancy test



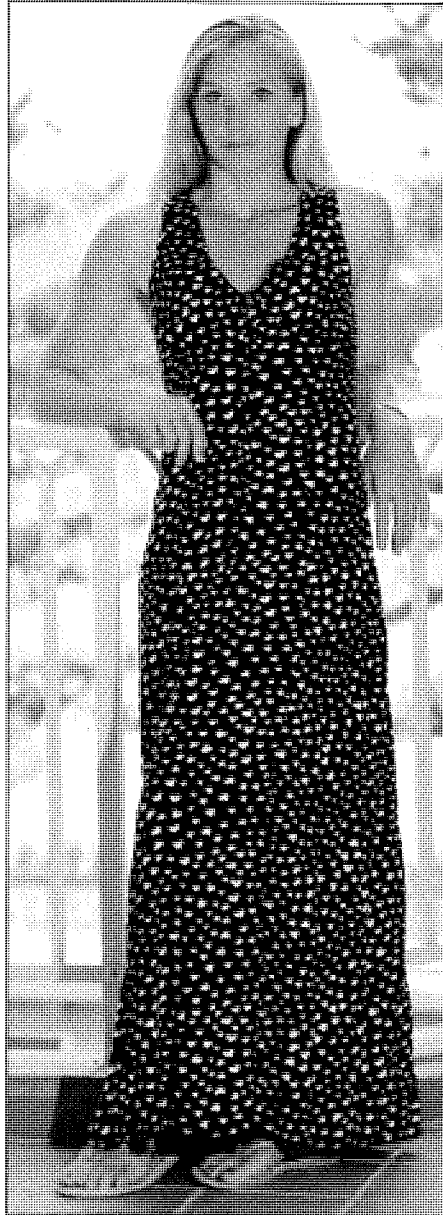
Gene Simmons' daughter Sophie says she was told she was 'not small enough' to be a model and reveals her mom taught her to love her shape



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Mexico and Little Saint James, a private 70-acre atoll in the US Virgin Islands.



A new life: Virginia, now a mother-of-three, in Australia

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

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

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

Epstein elicited the information that Virginia had been a runaway, and was no longer a virgin.

Virginia was then told to start massaging Epstein, under the instructions of the woman who had shown her in. The massage quickly developed into a sexual encounter.

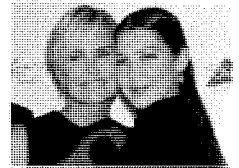
Virginia was uncomfortable, but reluctant to deny such important people. 'My face was red with embarrassment,' she says. 'But I felt under immense pressure to please them.

The whole time it was going on, they were promising me the world, that I'd travel with Jeffrey on his private jet and have a well-paid profession.' Afterwards, she was given two \$100 bills and told to return the next day.

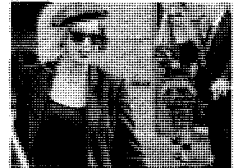
That was the beginning of the four years she spent with Epstein.

For three of those years, she was under Florida's age of consent, which is 18.

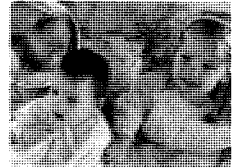
'I'd cry because there was nothing I could do to help': Bella Hadid pens emotional note about her mother Yolanda's Lyme disease battle and shares the impact of her own struggle



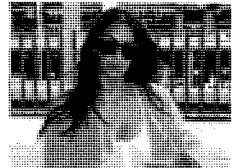
Has the Queen Bey lost her sting? Beyonce steps out in two questionable outfits as she recycles Super Bowl Reformation look. She is still a trailblazer.



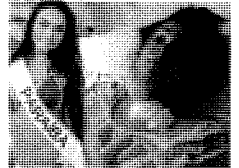
Jenna Bush Hager shares somber message about motherhood as she reveals her daughter was baptized only hours before Orlando shooting



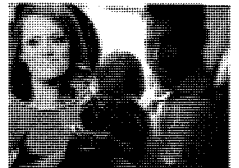
Time for Kardashian klass! From 'bloop' to 'ratchet'... Kim schools fans in how to talk like a true-blooded member of the family. How to be like them



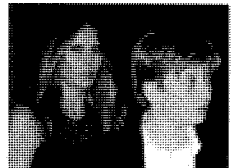
Brazilian Miss Bum Bum model reveals she is paralysed from the waist down after throwing herself from a fourth floor window in suicide attempt



Southern Charm stars claim Kathryn Dennis failed drug test in custody battle with wealthy drug-shamed former politician Thomas Ravenel as he takes their kids to NYC



Mini-me Barron joins parents Donald Trump and Melania at The Polo Bar for dinner the night before his 70th birthday (and Secret Service chauffeurs them the one block walk home)



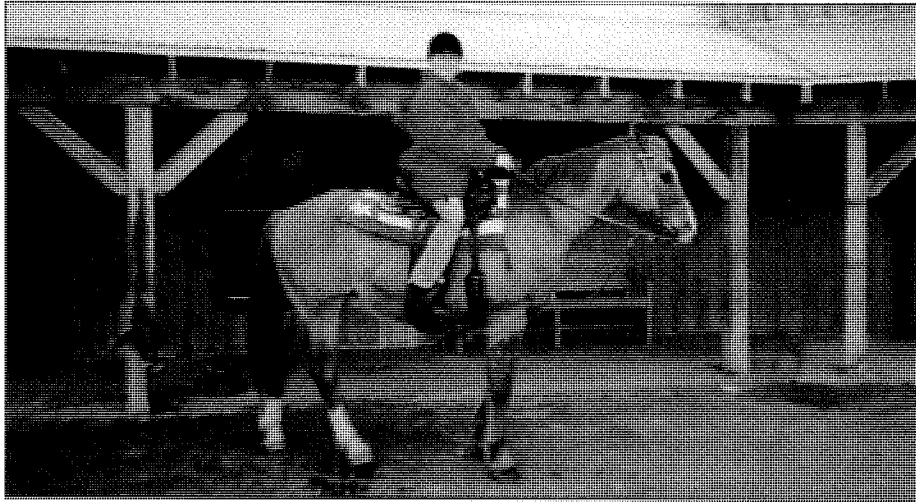
Lord of the manor! Scott Disick views \$2.8million property in Beverly Hills as he hunts for a house to fix up and sell. He is 33



Peek-a-boob! Heidi Klum flashes cleavage

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Troubled teenager: Virginia on the billionaire's Zorro ranch in New Mexico in 2001

Virginia was fascinated by his life story: the son of a humble New York City parks worker, he was a teacher before becoming a Wall Street broker and friends with the upper echelons of the political, financial and academic establishment.

As a confused teenager, Virginia easily fell into the practice of sexually gratifying him for money. He guaranteed her a minimum of \$200 each time she gave him what he called an 'erotic massage.'

Virginia said: 'I would always receive the money immediately. He would give me the cash from a wad he carried in a black duffel bag or an assistant paid me.

'And, because of the way Epstein had warped her sensibilities, every time she took the cash, Virginia felt even more indebted to him. Secretly, he was also preparing her for an even more disturbing role.

'Basically, I was training to be a prostitute for him and his friends who shared his interest in young girls,' she says: 'After about two years, he started to ask me to "entertain" his friends.'

It started when Epstein called Virginia at the Palm Beach apartment he had rented for her.

She recalls: 'He said, "I've got a good friend and I need you to fly to the island to entertain him, massage him and make him feel how you make me feel."

He didn't spell out what I had to do. He didn't have to. 'He'd trained me to do whatever a man wanted. I was shocked but I told myself he was sharing me around because he trusted me and I was special.

I was worried, but I would do anything to keep Jeffrey happy and to keep my place as his number one girl.

He would keep telling me how lucky I was with the life I was leading and the money I was making. It was easy to fall into his grasp.

'The way it usually worked was I'd be sent to meet a man on the private island Jeffrey owned in the Caribbean, or at his ranch in New Mexico, which was really isolated.' She was 'given' to men ranging in age from their 40s to their 60s.

They included a well-known businessman (whose pregnant wife was asleep in the next room), a world-renowned scientist, a respected liberal politician and a foreign head of state.

None appeared to think the arrangement was unusual. Virginia says there were many other girls in Epstein's circle and that she was paid extra money to help recruit them.

'They would lounge around the Palm Beach house, the ranch or the island, nude or topless,' she says. 'But I was one of the very few he trusted as "special" and chosen to "entertain" his friends.'

Virginia took the sedative Xanax to detach herself from sordid reality. 'It was an escape drug,' she says. 'It made me calm and helped me forget about what I had to do. I was up to eight pills a day.'

Epstein had no objection to Virginia's use of prescription drugs, no doubt recognising that they made her even more malleable. 'I didn't want to go back to the life I'd had before' she says.

'That made me totally obedient.' Despite the fact that Epstein was, essentially, her pimp, this life now seemed normal to Virginia. 'I felt that he and Ghislaine really cared for me,' she said.

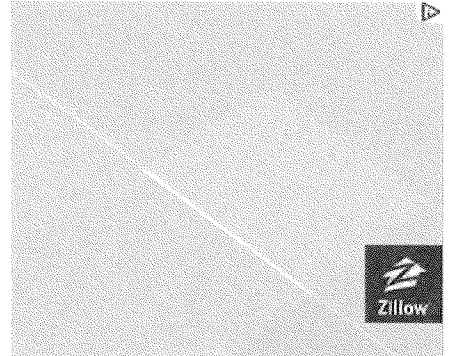
'We'd do family things, like watch Sex And The City and eat popcorn. 'A lot of it was very glamorous. I met famous friends of his such as Al Gore and Heidi Klum and Naomi Campbell. He introduced me as his "travelling masseuse."

Some people mistook me for his daughter. 'When we were in New York or Palm Beach, Ghislaine and I would shop all day.

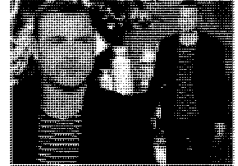
as she leaves her blouse undone across her chest during NYC outing with her children Mom-o-four



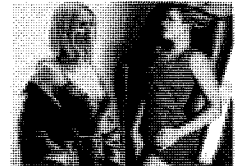
She's almost as tall as her mom! Courteney Cox's daughter Coco Arquette wears high heels and polka dot dress for her 12th birthday at Nobu



'It's hard on me': Liev Schreiber talks struggle of working in LA while Naomi Watts and their two kids are in NYC as he sits down with Ellen He misses them



'I was too big': Khloe Kardashian reveals stylists refused to work with her before she lost 40lbs as she wows in stunning natural shoot for Harper's Bazaar



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Jeffrey bought me jewellery – diamonds were his favourite – and wonderful furniture. He was paying me very well because I'd give him sex whenever he wanted it.'

She was, she says, delighted when Epstein invited her to accompany him on a six-week trip in 2001.

'He said we'd be going to Europe and North Africa to meet architects and interior decorators because he wanted to redo his New Mexico house.

I threw my arms around him and gave him a peck on the cheek.' They flew to Paris, then Spain, then Tangier.

Finally, they went to London. 'After we landed, we drove straight to Ghislaine's house,' says Virginia. 'I was given a small upstairs bedroom. The following morning, Ghislaine came in.

She was chirpy and jumped on the bed saying, "Get up, sleepyhead. You've got a big day. We've got to go shopping. You need a dress as you're going to dance with a Prince tonight."

'She said I needed to be "smiley" and bubbly because he was the Queen's son.

Ghislaine and I went to Burberry, where she bought me a £5,000 bag, and to a few other designer stores where we bought a couple of dresses, a pair of embroidered jeans and a pink singlet, perfume and make-up.

We got back to Ghislaine's house at around 4pm and I ran straight upstairs to shower and dress.

When I went downstairs, Ghislaine and Jeffrey were in the lounge. There was a knock at the door. Ghislaine led Andrew in and we kissed each other on the cheek. 'Ghislaine served tea from a porcelain pot and biscuits. She knew Sarah Ferguson and they talked fondly about Andrew's daughters.

Then Ghislaine asked Andrew how old he thought I was and he guessed 17 and they all laughed. Ghislaine made a joke that I was getting too old for Jeffrey.

She said, "He'll soon have to trade her in." It was widely known that he liked young girls.' The four of them went out to dinner and on to Tramp nightclub where, she says, Andrew danced with her.

'After about an hour-and-a-half, we drove back to Ghislaine's.

All of us went upstairs and I asked Jeffrey to snap a picture of me with the Prince. I wanted something to show my Mom. Ghislaine and Jeffrey left us after that, and later Andrew left.

'In the morning, Ghislaine said, "You did well. He had fun". We flew straight back to the States.' The Mail on Sunday has confirmed that the tycoon's jet flew to Paris on March 6, 2001, continuing to Granada, Tangier and London, before returning to New York.

On the last leg of the trip, Virginia was paid about \$15,000 (£9,400) by Epstein. 'It was amazing money, more than I'd ever made on a trip with him before.

He didn't say there was any special reason, but I felt like I'd done everything he wanted. He was very pleased.'

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.

However, the Prince must have been aware of Epstein's conviction when he stayed with him in New York in December.

Virginia says she met Andrew for a second time around Easter 2001 at Epstein's Manhattan mansion.

'When I got to the mansion, I was told, "Get ready. You are meeting someone in the office" – which is what they called the library. Andrew was sitting there in a big leather armchair.

Ghislaine had just given him a present, a big toy that was his Spitting Image puppet. 'He was smiling ear-to-ear. He looked like a kid whose parents were taking him to Disney World.

A beautiful girl called Johanna Sjöberg who worked for Jeffrey was sitting on Andrew's knee. Ghislaine guided me over to Andrew and I think he recognised me, though I don't know if he remembered my name.



Counselling: Virginia at her mother's home at Palm Beach in 1998

I took eight pills a day to help me forget what I had to do. It made me calm.

'I'm dating a separated married man.' Bethenny Frankel reveals she went to high school with wife of new boyfriend Dennis Shields
Skinny Girl founder

Get in there! Prince Harry and Zara Tindall can't contain their excitement as they watch their horses gallop to victory at Royal Ascot

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Seven-year-old's mom is Lisa Bonet

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Another Bachelor baby! Peyton and Chris Lambton are 'thrilled' to be expecting their first child after four years of marriage
The two wed in 2012

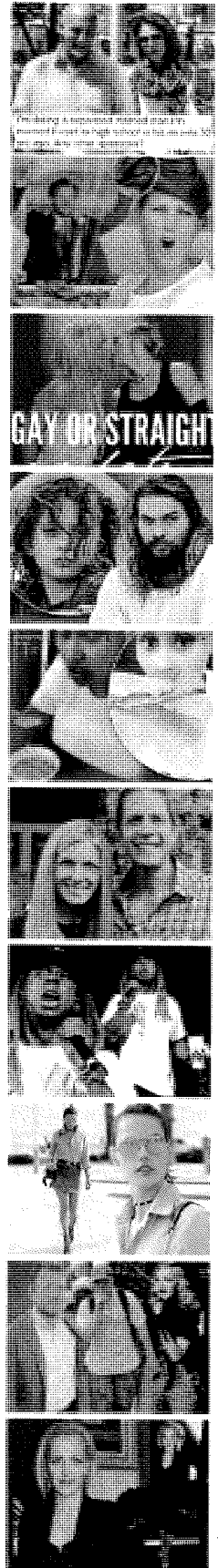
Lil Wayne 'guzzled three bottles of cough syrup mix lean' before suffering TWO seizures...as rapper now 'stable and in good spirits'

Cowgirl chic! Alessandra Ambrosio shows off toned legs with mini skirt as the stunner goes for a denim-on-denim look
Victoria's Secret Angel

Madonna and Guy Ritchie on brink of deal over custody of their 15-year-old son Rocco as judge agrees to call off showdown court hearing for more talks

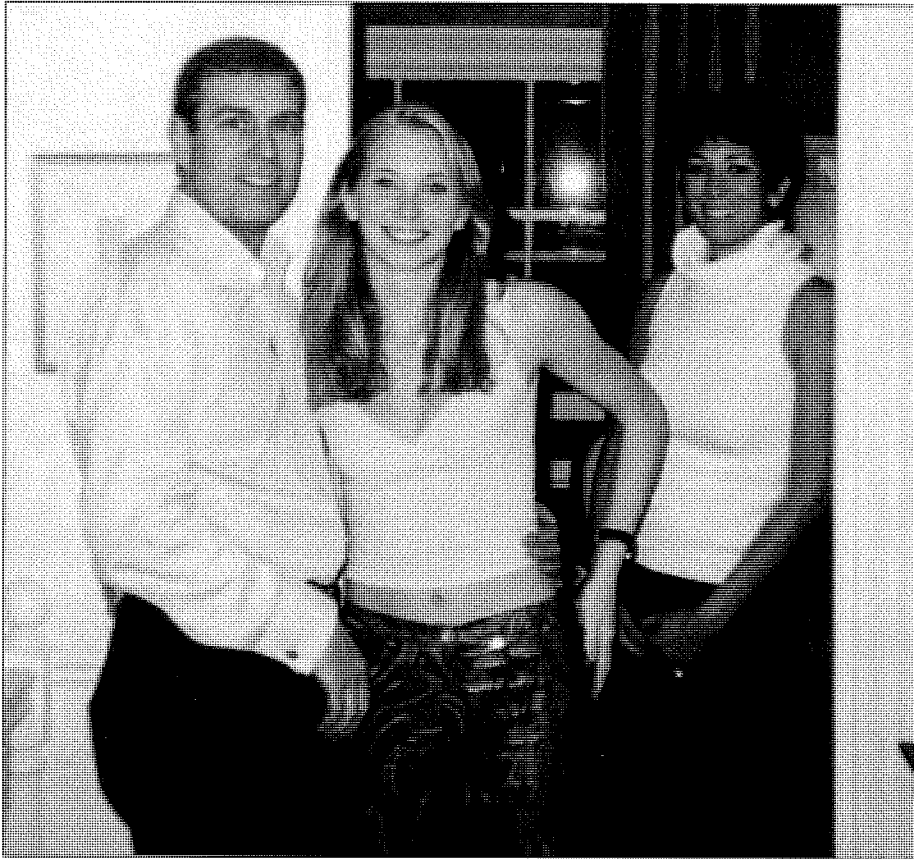
Gillian Anderson looks demure in sophisticated navy knee-length dress as she attends star studded charity gala
On behalf of Action on Addiction

Charlie Sheen cuts a casual figure while out and about in Stockholm... After becoming the new face



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Organiser: Ghislaine Maxwell looks on as Andrew put his arm around Virginia. Robert Maxwell's daughter invited her to work as Epstein's personal masseuse soon after her 15th birthday

We kissed on the cheek and Ghislaine placed me on his other knee.' Johanna spoke to The Mail on Sunday three years ago about this incident, which took place when she was 21.

She said: 'Ghislaine put the puppet's hand on Virginia's breast, then Andrew put his hand on my breast. It was a great joke. Everybody laughed.' After this, Virginia was paid, by Epstein, around \$400 (£250).'

She met Andrew for the third and final time on Epstein's Caribbean island, Little Saint James. Virginia was never under the British legal age of consent when she met Andrew. She was 17 during the first two encounters and 18 at the third.

By now, however, Epstein, had started to hint that she was getting 'too old' for him.

But during one trip to the island, Epstein and Ghislaine made their most astonishing proposition, and one which repulsed her. 'They said Jeffrey wanted me to have his child,' she says.

'They said I was part of their family and I was beautiful, young, loyal and nurturing and would be a great mother.

They said I would have to sign a contract relinquishing rights to the child and consenting to Jeffrey having as many relationships as he liked. In return I would have my own mansion in Palm Beach and a large monthly payment, a percentage of his income.'

This, finally, was a wake-up call to Virginia and she began to see the way in which she had been groomed.

'It was a smack in the face,' she says. 'I finally realised this wasn't ever going to be a real relationship but I knew if I refused, I'd be thrown back on the streets. So I said, "I'm too young. I want to get my massage credentials, then maybe we'll do it".'

The tycoon took her at her word and, for her 19th birthday in August 2002, flew her to Thailand where he enrolled her in a massage course.

Shortly after arriving there, she met an Australian martial arts expert called Robert. They fell in love and, just ten days later, married in a Buddhist ceremony.

'I called Jeffrey and told him I'd fallen madly in love,' Virginia says. 'I was hoping he'd be delighted. But he said, "Have a nice life," and hung up on me.' The couple now have two sons, aged five and four, and a daughter who recently turned one.

'The first few months after I married Robert were the worst,' she says. 'I couldn't bring myself to tell him much. No man wants to know his wife has been traded out.

'I felt very alone. I was having panic attacks and seeing a psychiatrist and was on anti-depressants.

'Virginia was beginning to put her Epstein days behind her when, three years ago, she was phoned by the FBI.

of condom brand Lelo
Hex



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Paying respects

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Selling Hancock Park seven-bedroom home which he bought in 2014

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Katharine McPhee flashes a hint of sideboob in a plunging unbuttoned black dress as she poses at the Monte Carlo Television Festival

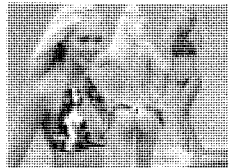
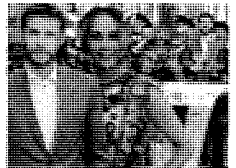
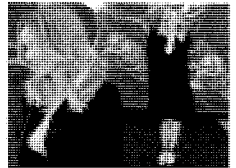
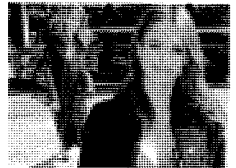
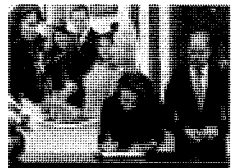
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Ava Sambora puts on an eye-popping display for sizzling photo shoot as she parades her enviable bikini bod in Malibu
Daughter of rocker Richie Sambora

How does Adele make YOU feel? Sad songs provide 'enjoyment, comfort or pain to different people'
Great comfort from seemingly sad songs

Daisy Lowe and rumored boyfriend Darius Campbell appear in high spirits as they leave star-studded charity event
She is 27

Sir Paul McCartney leads tributes as Wings guitarist Henry



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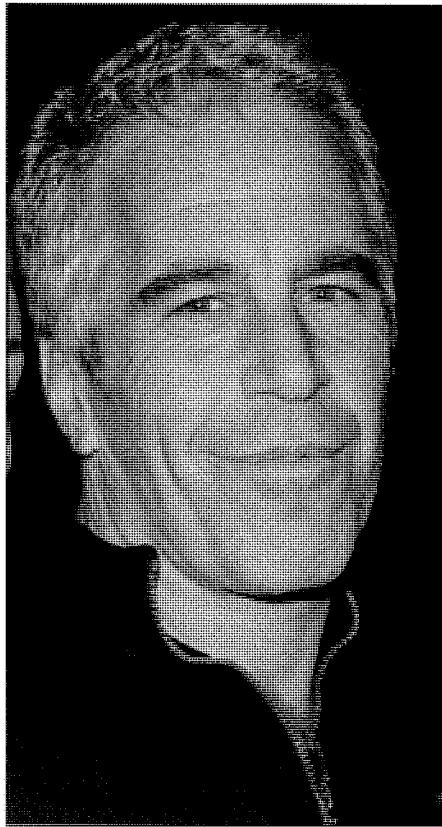
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'They said they had found photos of me at Jeffrey's Palm Beach house,' she says. '[Epstein had] hidden cameras watching me the entire time even when I was in the bathroom. I was so embarrassed.'

'I told the FBI that my true purpose was sexual. They told me everything he did was illegal because I was under age.' (The age of consent in Florida is 18).

'They said that if it had to go to trial, they'd need me because I'd lived with him and that made me a key witness. I was very afraid, because he had so much power, but eventually I agreed to testify.'

I was glad he'd finally been found out. He shouldn't be hurting other girls. Following Epstein's arrest, investigators are believed to have found a list of men's names on his computer and asked him whether they had been 'treated' to sexual encounters with his menage of minors.



Conviction: Jeffrey Epstein

'He took the Fifth Amendment, refusing to answer, indicating that if he were to answer the question, it could be incriminating,' a source told The Mail on Sunday.

Epstein struck a deal resulting in what commentators characterised as a 'slap on the wrist' for him, and ended up serving 13 months of his sentence, much of it in a liberal work-release programme. Lawyer Brad Edwards, who represented several of Epstein's victims, said: 'Rather than punish him the way they would an average Joe, they sent a clear message that with enough money and power and influence, the system can be bought.'

Virginia was spared her the humiliation of having to go before a jury, and has kept her feelings bottled up until last weekend's photograph of Andrew with Epstein triggered distressing memories.

Virginia says: 'I am appalled. To me, it's saying, "We are above the law." But Jeffrey is a monster.'

Last night, neither Epstein, Ghislaine Maxwell nor Prince Andrew would comment on Virginia's story.

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McCullough who played on Live and Let Die Bond theme dies aged 72
Remembering his pal

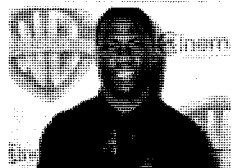


Bargain shopper! Drew Barrymore sports colorful silk jacket as she loads up a trolley with knick-knacks at flea market
She's a mom-of-two

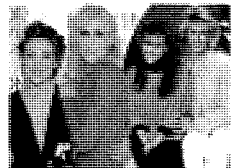
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A landmark day for the 18-year-old actress



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Catching up



No show: Mets pitcher Bartolo Colon skips court hearing over dispute with once-secret ex-girlfriend and their two love children



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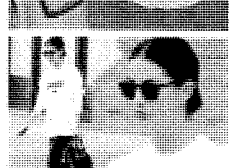
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She is 37



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Teenage girl recruited by paedophile Jeffrey Epstein reveals how she twice met Bill Clinton

By SHARON CHURCHER and POLLY DUNBAR FOR MAILONLINE
 UPDATED: 19:53 EST, 5 March 2011

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As a New Yorker from humble beginnings, Jeffrey Epstein played on his blue-collar credentials and enormous wealth to extend tentacles of influence throughout America's liberal political elite.

During the outcry over the Epstein case, it emerged that another man with a notorious appetite for young women, Bill Clinton, travelled with Epstein to a number of destinations, including three times on the billionaire's private aircraft.

On one occasion, Epstein flew the former President, Hollywood actor and staunch Democrat Kevin Spacey and another actor friend of Mr Clinton's, Chris Tucker, to Africa, to 'discuss AIDS policy'.



Claims: Virginia Roberts says she twice met ex-president Bill Clinton, pictured last month, but was never 'lent out'

Epstein, who has donated more than £75,000 over the years to candidates from the Democratic Party, also flew with Mr Clinton in November 2003 to destinations including Russia, Oslo, Hong Kong, Shanghai and Beijing.

Yet Virginia Roberts stresses that she was never 'lent out' to Mr Clinton.

On one occasion, she adds, Epstein did invite two young brunettes to a dinner which he gave on his Caribbean island for Mr Clinton shortly after he left office. But, as far as she knows, the ex-President did not take the bait.

'I'd have been about 17 at the time,' she says. 'I flew to the Caribbean with Jeffrey and then Ghislaine Maxwell went to pick up Bill in a huge black helicopter that Jeffrey had bought her.'

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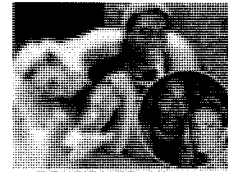
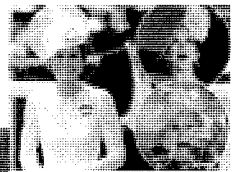


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Whooped and cheered

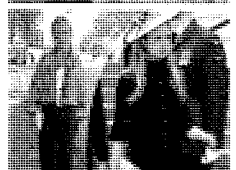


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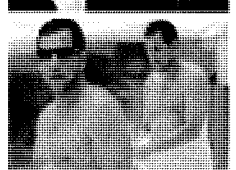
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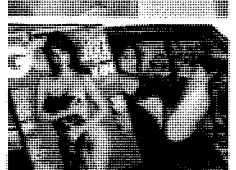
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Dad bod! Adam
Sandler, 49, shows off
his naked chest while
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Miami vacation with his
wife of 13 years
Couple looked blissful



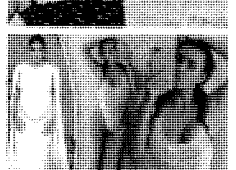
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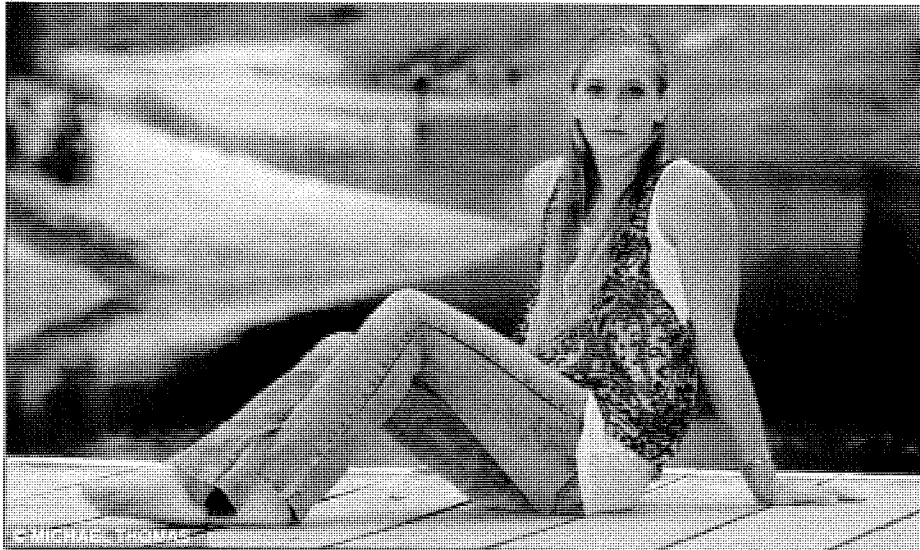
'She'd always wanted to fly and Jeffrey paid for her to take lessons, and I remember she was very excited because she got her licence around the first year we met.

'I used to get frightened flying with her but Bill had the Secret Service with him and I remember him talking about what a good job she did.

'I only ever met Bill twice but Jeffrey had told me that they were good friends.

'I asked, "How come?" and he laughed and said, "He owes me some favours." Maybe he was just joking but it constantly surprised me that people with as much to lose as Bill and [Prince] Andrew weren't more careful.

'Bill must have known about Jeffrey's girls. There were three desks in the living area of the villa on the island.



Speaking out: Virginia, now aged 28, in her new home in Australia

'They were covered with pictures of Jeffrey shaking hands with famous people and photos of naked girls, including one of me that Jeffrey had at all his houses, lying in a hammock.

'We all dined together that night. Jeffrey was at the head of the table. Bill was at his left. I sat across from him. Emmy Talyer, Ghislaine's blonde British assistant, sat at my right.

'Ghislaine was at Bill's left and at the left of Ghislaine there were two olive-skinned brunettes who'd flown in with us from New York.

'I'd never met them before. I'd say they were no older than 17, very innocent-looking.

'They weren't there for me. They weren't there for Jeffrey or Ghislaine because I was there to have sex with Jeffrey on the trip.

'Maybe Jeffrey thought they would entertain Bill, but I saw no evidence that he was interested in them. He and Jeffrey and Ghislaine seemed to have a very good relationship. Bill was very funny.

'He made me laugh a few times. And he and Jeffrey and Ghislaine told blokey jokes and the brunettes listened politely and giggled.

'After dinner I gave Jeffrey an erotic massage. I don't remember seeing Bill again on the trip but I assume Ghislaine flew him back.'

According to prison records, when Epstein was serving his jail term, his visitors included a long-time - and highly controversial - Clinton acquaintance, Arnold Proserpi.

'In the final hours of the Clinton presidency, in January 2001, Proserpi was facing three years in prison after being convicted of tax fraud. Mr Clinton commuted his sentence to house arrest.

'Clinton, Proserpi and Epstein make an odd threesome on the face of it,' says a law enforcement source.

'Was Proserpi visiting Epstein as some kind of intermediary for Bill?

'Maybe Bill wanted to know if Epstein knew anything that could embarrass him. Or did Bill commute Proserpi's sentence as some kind of favour for Epstein?'

Virginia disclosed that Mr Clinton's vice-president Al Gore and his wife, Tipper, were also guests of Epstein on his island.

'Bill must have known about Jeffrey's girls. There were three desks in the living area of the villa on the island... covered with photos of naked girls'

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© AFP/Getty Images

Guests: Virginia says she also met former Vice President Al Gore, pictured right with Mr Clinton

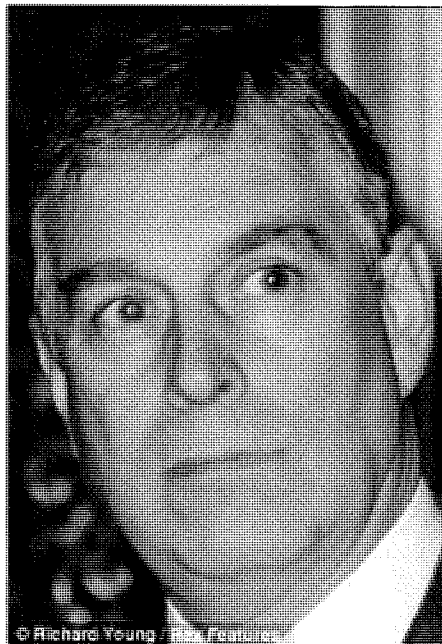
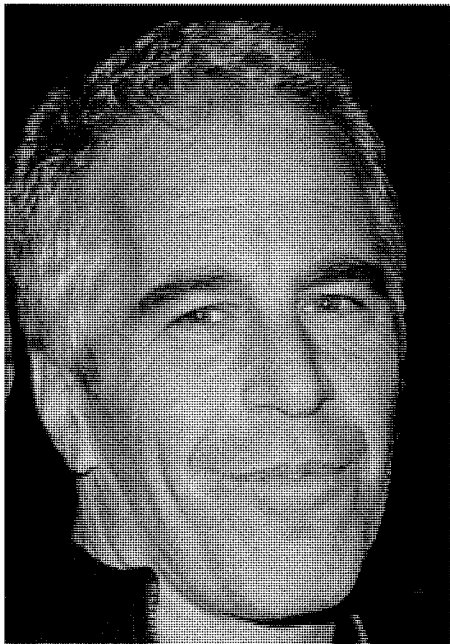
Last summer, the Gores abruptly announced that they were ending their supposedly fairytale marriage and, just weeks later, it emerged that Mr Gore – the famously sanctimonious global-warming disciple – had been accused of trying to force sex on a woman with whom he had booked a therapeutic massage at an Oregon hotel.

'I had no clue that anything was up,' Virginia says. 'The Gores seemed like a beautiful couple when I met them. All I knew was that Mr Gore was a friend of Jeffrey's and Ghislaine's. Jeffrey didn't ask me to give him a massage.'

'There might have been a couple of other girls there on that trip but I could never have imagined this guy would do anything wrong. I was planning to vote for him when I turned 18. I thought he was awesome.'

Virginia said that yet another American liberal icon, President Obama's Middle East peace envoy Senator George Mitchell, frequently visited Epstein's New York residence.

Mr Mitchell, aged 77 – who previously led America's Northern Ireland peace initiative – 'was very close to Jeffrey,' Virginia recalled. 'He is very clean-cut. You wouldn't think of him being part of Jeffrey's crew.'



© Richard Young / Rex Features

Scandal: U.S. authorities want to interview Jeffrey Epstein (left) and may wish to quiz his friend, Prince Andrew

Epstein's contacts book contains a work and a home telephone number for the senator.

Another acquaintance was Israel defence secretary Ehud Barak, whose spokesman told The Mail on Sunday: 'Mr Barak did attend several small functions in Mr Epstein's home in New York that were usually attended by leading businessman, university presidents, Nobel Prize Laureates and prominent public figures.'

'We just want them to have a normal life': Blake Lively reveals her parenthood plans now that baby no.2 is on its way and why she fell in love with Ryan Reynolds



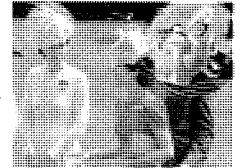
Back to work! Miley Cyrus and Liam Hemsworth temporarily go their separate ways... after very public dinner date in NYC



Ivanka Trump shares morning snap of baby Theo watching her get ready as she admits in that she wakes up at 5:30am and goes to work with her hair wet



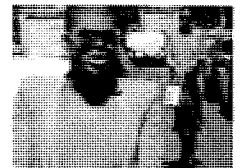
They could be sisters! Princess Mary of Denmark and Duchess of Cambridge look strikingly similar as they enjoy a catch up at Royal Ascot



Brooke Shields' stalker GRINS walking into court with trial entering third day after judge hears actress's tearful testimony about man coming to her home



Mixing business with pleasure! Bodysuit-clad EJ Johnson gets in some retail therapy before filming his yet-to-air New York reality show



Seth Myers 'bans' Trump from appearing on NBC's Late Night

6/15/2016

Case 1:15-cv-07438-RWS Document 210-3 Filed 06/15/16 Page 9 of 5

Epstein's many Hollywood pals include Matt Groening, creator of The Simpsons.

'Jeffrey once had me give Matt a foot massage when he was flying on the jet with us,' Virginia says.

'He laughed and did drawings of Bart and Homer for my little brother and my dad.

'I also met Naomi Campbell at a birthday party of hers on a yacht in the South of France. She is a friend of Ghislaine's but she was a real bitch to me.

'She was very fake. She turned away from me when we were introduced by Ghislaine and Jeffrey.

'Donald Trump was also a good friend of Jeffrey's. He didn't partake in sex with any of us but he flirted with me. He'd laugh and tell Jeffrey, "You've got the life."

Palm Beach Police say Epstein seemed utterly unfazed by the allegations against him when they began their long and detailed investigation.



'Jeffrey's crew: Middle East peace envoy George Mitchell, right, pictured with President Barack Obama and U.S. Secretary of State Hilary Clinton, frequently visited Epstein's New York residence, Virginia also claims

But he also took his defence very seriously indeed. Epstein engaged his friend, the Harvard law professor Alan Dershowitz – whose celebrity clients have included Mike Tyson, Patty Hearst, Claus von Bulow and O.J. Simpson – to run his legal defence.

He also employed a firm of private investigators to investigate the backgrounds of the girls.

Detectives painstakingly built a case which they believed showed that Epstein systematically paid teenage girls to recruit other teenage girls to his sex ring.

However, as the investigation continued, they found that Epstein's team had already spoken to key witnesses, suggesting that the financier would reward those who helped him.

In addition, Epstein's defence team agreed to the unusual move of suggesting that the alleged victims sue Epstein in the civil courts. The result was a plea bargain in which Epstein admitted a single charge of soliciting an underage girl for prostitution – a deal which infuriated many police officers who worked on the case.

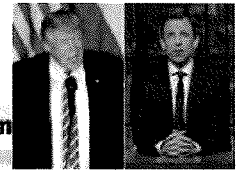
More than 20 of Epstein's girls are said to have sued him for damages. At least 17 have settled out of court.

Mr Clinton, Mr Gore and Mr Mitchell were all contacted about their friendship with Epstein but declined to comment.

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show - but admits the presidential hopeful wasn't going to come on anyway



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Victoria Beckham shows a hint of sideboob and flash of leg as she flaunts her sartorial sass for cover of Vogue Korea Striking shoot



A mellow day! Rumer Willis dresses down in a grey maxi dress as she hangs out with a friend in West Hollywood Taking a break from the presidential campaign



Catherine Zeta-Jones' daughter Carys is her doppelgänger as the pair arrive in London with Michael Douglas and son Dylan Family trip



Stephen Colbert compares Trump to a NAZI as he draws a swastika on chalkboard while trying to 'figure out' Obama's response to Orlando massacre



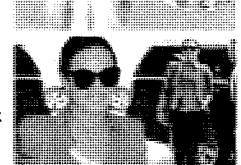
Grieving Adam Levine is pictured playing golf in first outing since Christina Grimmie's death... after offering to pay for the Voice star's funeral



Does North West have her own glam squad? Kim Kardashian 'hires daughter \$5k a week team including hairstylist and manicurist'



The smile's back! Demi Lovato appears happy at airport while looking chic in olive coat as she recovers from Wilmer Valderrama shock split Wore classic combo



'I'm not killing off Harrison Ford': Steven Spielberg reveals he won't end Indiana Jones' life in next film as he gives rare interview Good news for Ford!



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Statement on Behalf of Ghislaine Maxwell

BY DEVONSHIRES SOLICITORS, PRNE
WEDNESDAY, MARCH 9, 2011

LONDON, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her that have appeared recently in the media. These allegations are all entirely false.

It is unacceptable that letters sent by Ms Maxwell's legal representatives to certain newspapers pointing out the truth and asking for the allegations to be withdrawn have simply been ignored.

In the circumstances, Ms Maxwell is now proceeding to take legal action against those newspapers.

"I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get in the way of a good story." However, the allegations made against me are abhorrent and entirely untrue and I ask that they stop," said Ghislaine Maxwell.

"A number of newspapers have shown a complete lack of accuracy in their reporting of this story and a failure to carry out the most elementary investigation or any real due diligence. I am now taking action to clear my name," she said.

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Filed under: Government and Policy, Law, Media

Tags: Devonshires Solicitors, London, March 10, United Kingdom

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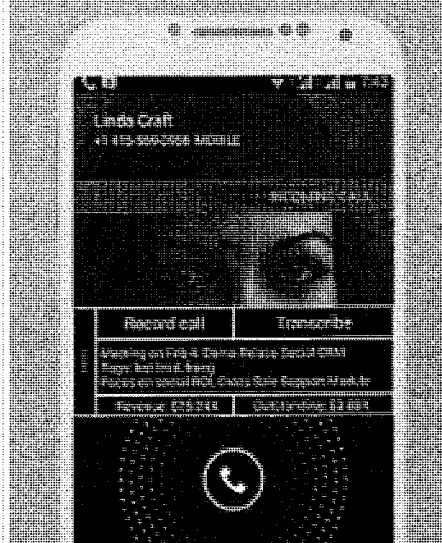
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EXHIBIT

26

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5/3/16 KAM

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EXHIBIT D

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

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

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES
_____ /

**JANE DOE #3 AND JANE DOE #4's CORRECTED MOTION PURSUANT TO RULE 21
FOR JOINDER IN ACTION**

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

FACTUAL BACKGROUND

¹ As minor victims of sexual offenses, Jane Doe #3 and Jane Doe #4 desire to proceed by way of pseudonym for the same reasons that Jane Doe #1 and Jane Doe #2 proceeded in this fashion. Counsel for the new victims have made their true identities known to the Government.

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

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

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

Jane Doe #3's Circumstances

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

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

Epstein also sexually trafficked the then-minor Jane Doe, making her available for sex to politically-connected and financially-powerful people. Epstein's purposes in "lending" Jane Doe (along with other young girls) to such powerful people were to ingratiate himself with them for

business, personal, political, and financial gain, as well as to obtain potential blackmail information.

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

Ghislaine Maxwell was another person in Epstein's inner circle and a co-conspirator in Epstein's sexual abuse. She was someone who consequently also appreciated the immunity granted by the NPA for the crimes she committed in Florida. In addition to participating in the sexual abuse of Jane Doe #3 and others, Maxwell also took numerous sexually explicit pictures

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

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

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

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

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

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

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

Jane Doe #4's Circumstances

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

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

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

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

The acts Epstein committed against Jane Doe #4, constituted numerous federal sex offenses, some of which do not carry a statute of limitations and thus are not time-barred. *See* 18 U.S.C. § 3283. And these offenses were the kinds of offenses that the Federal Bureau of Investigation (FBI) and U.S. Attorney's Office for the Southern District of Florida were pursuing in 2007. So far as Jane Doe #4 is aware, the U.S. Attorney's Office made no serious effort to locate her. Instead, after identifying approximately forty separate underage sexually abused victims, and apparently preparing a 53-page federal indictment and with full awareness of the existence of many victims like Jane Doe #4 – unidentified and not interviewed – it entered into a non-prosecution agreement barring prosecution of Epstein's federal crimes against these victims. This is contrary to the Government's normal approach in prosecuting federal sex offenses. It also violated Jane Doe #4's rights under the CVRA, including the fact that she had a "reasonable" right to confer with the U.S. Attorney's Office before they entered into an agreement with a sex offender barring prosecution of him for the crimes he committed against her. 18 U.S.C. § 3771(a)(5).

MOTION FOR JOINDER

Jane Doe #3 and Jane Doe #4 now both move to join this action filed by Jane Doe #1 and Jane Doe #2, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Rule 21 provides that "[o]n motion or on its own, the court may at any time, on just terms, add . . . a party." Rule 21 "grants the court broad discretion to permit a change in the parties at any stage of a litigation." *Ford v. Air Line Pilots Ass'n Int'l*, 268 F. Supp. 2d 271, 295 (E.D.N.Y. 2003) (internal quotation omitted). The new victims should be allowed to join the current victims in this action under Rule 21.

The new victims will establish at trial that the Government violated their CVRA rights in the same way as it violated the rights of the other victims. The new victims' participation in this case is important because it appears that the Government intends to raise a factual defense that somehow it did keep Jane Doe #1 and Jane Doe #2 properly informed of what was happening in the criminal prosecution. Of course, if four victims all testify consistently that they were not properly informed by the Government (as we believe they will), that provides a stronger case for a CVRA violation.

In addition, Jane Doe #3 and Jane Doe #4's participation is relevant to a defense the Court has allowed the Government to raise. The Court has previously ruled that the victims' request for rescission of the NPA "implicates a fact-sensitive equitable defense which must be considered in the historical factual context of the entire interface between Epstein, the relevant prosecutorial authorities and the federal offense victims – including an assessment of the allegation of a deliberate conspiracy between Epstein and federal prosecutors to keep the victims in the dark on the pendency of negotiations between Epstein and federal authorities until well after the fact and presentation of the non-prosecution agreement to them as *a fait accompli*." DE 189 at 12 n.6 (emphasis added). Jane Doe #3's and Jane Doe #4's participation in this case will help to show what the "entire interface" was between the Government and the victims and thus to respond to the Government's estoppel arguments as well as other defenses that it appears to be preparing to raise. *See, e.g.*, DE 62 (52-page response from the Government to the victim's summary judgment motion, raising numerous factually-based and other arguments against the victim's position).

Jane Doe #3's and Jane Doe #4's participation is also directly relevant to the discovery disputes currently pending in this case. The Government has raised various relevancy objections to the documents that Jane Doe #1 and Jane Doe #2 are attempting to obtain. The current victims have responded by explaining how these documents are relevant, including explaining how these documents might bear on the way in which Epstein used his powerful political and social connections to secure a favorable plea deal, as well as provide proof of the Government's motive to deliberately fail to investigate certain aspects of the victims' claims in an effort to maintain the secrecy of the facts and resolve the case without the victims' knowledge. *See, e.g.*, DE 266 at 6-10. Jane Doe #3 and Jane Doe #4's participation will help prove the relevancy of these requests, as well as the need for those requests.

One clear example is Request for Production No. 8, which seeks documents regarding Epstein's lobbying efforts to persuade the Government to give him a more favorable plea arrangement and/or non-prosecution agreement, including efforts on his behalf by Prince Andrew and former Harvard Law Professor Alan Dershowitz. Jane Doe #1 and Jane Doe #2 have alleged these materials are needed to prove their allegations that, after Epstein signed the non-prosecution agreement, his performance was delayed while he used his significant social and political connections to lobby the Justice Department to obtain a more favorable plea deal. *See, e.g.*, DE 225 at 7-8 (discussing DE 48 at 16-18). Jane Doe #3 has directly person knowledge of Epstein's connection with some of these powerful people and thus how Epstein might have used them to secure favorable treatment.

Adding two new victims to this case will not delay any of the proceedings. They will simply join in motions that the current victims were going to file in any event. For example, the

new victims will simply join in a single summary judgment motion that the current victims anticipate filing after discovery has been completed.

Nor will adding the new victims prejudice the United States. As the court is aware, this Court is still in its initial discovery stage. The Court is currently considering whether to reject the Government's assertion of privilege over documents regarding the case. *See* DE 265 (victims' reassertion of objections to the Government privilege claims). The new victims do not seek any additional discovery beyond that previously sought by the current victims.² Accordingly, the United States will not be prejudiced or burdened by adding them to this case.

The CVRA does not contain any statute of limitations for filing an action to enforce rights under the statute. Accordingly, were the Court to deny this motion, the result might be that the new victims would then be forced to file a separate suit raising their claims, which would then possibly proceed on a separate litigation track. Rather than require duplicative litigation, the Court should simply grant their motion to join.

Jane Doe #1 and Jane Doe #2 support the joinder motion. Counsel for the victims have discussed this motion with the Government at length in an effort to avoid any need to file a substantive pleading on the issue. Counsel for the victims asked the Government during the summer for its position on joinder. The Government, however, took the matter under advisement for months. Ultimately, after several inquiries from victims counsel, the Government indicated without explanation that it opposes this motion. Counsel for the victims has requested a meeting with the Government on this issue, which will hopefully occur in

² Jane Doe #3 and Jane Doe #4 have asked the Government to provide them with the record of their statements that they provided to the FBI. These FBI 302's should be only a few pages long.

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

CONCLUSION

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

DATED: January 2, 2015

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing document was served on January 2, 2015, on the following using the Court's CM/ECF system:

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Attorneys for the Government

/s/ Bradley J. Edwards

EXHIBIT E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:08-CV-80736-KAM

JANE DOE 1 and JANE DOE 2,

Petitioners,

vs.

UNITED STATES OF AMERICA,

Respondent.

**ORDER DENYING PETITIONERS' MOTION TO JOIN UNDER RULE 21 AND
MOTION TO AMEND UNDER RULE 15**

This cause is before the Court on Jane Doe 3 and Jane Doe 4's Corrected Motion Pursuant to Rule 21 for Joinder in Action ("Rule 21 Motion") (DE 280), and Jane Doe 1 and Jane Doe 2's Protective Motion Pursuant to Rule 15 to Amend Their Pleadings to Conform to Existing Evidence and to Add Jane Doe 3 and Jane Doe 4 as Petitioners ("Rule 15 Motion") (DE 311). Both motions are ripe for review. For the following reasons, the Court concludes that they should be denied.

I. Background

This is an action by two unnamed petitioners, Jane Doe 1 and Jane Doe 2, seeking to prosecute a claim under the Crime Victims' Rights Act (CVRA), 18 U.S.C. § 3771. (DE 1). Generally, they allege that the respondent Government violated their rights under the CVRA by failing to consult with them before negotiating a non-prosecution agreement with Jeffrey Epstein, who subjected them to various sexual crimes while they were minors. (*Id.*). Petitioners initiated this action in July 2008. (*Id.*).

On December 30, 2014, two other unnamed victims, Jane Doe 3 and Jane Doe 4, moved to join as petitioners in this action pursuant to Federal Rule of Civil Procedure 21. (DE 280). Petitioners (Jane Doe 1 and Jane Doe 2) support the Rule 21 Motion. (Id. at 11). Jane Doe 3 and Jane Doe 4 argue that they “have suffered the same violations of their rights under the [CVRA] as the” Petitioners, and they “desire to join in this action to vindicate their rights as well.” (Id. at 1). The Government vehemently opposes joinder under Rule 21. (DE 290). The Government argues that Rule 15 is the proper procedural device for adding parties to an action, not Rule 21. (Id. at 1).

“[O]ut of an abundance of caution,” Petitioners filed a motion to amend their petition under Rule 15, conforming the petition to the evidence and adding Jane Doe 3 and Jane Doe 4 as petitioners. (DE 311 at 2). The Government opposes the Rule 15 Motion as well. (DE 314). Among other things, the Government argues that amending the petition to include Jane Doe 3 and Jane Doe 4 should be denied because of their undue delay in seeking to join the proceedings, and the undue prejudice that amendment will cause. (Id.).

After considering the parties’ submissions and the proposed amended petition, the Court finds that justice does not require amendment in this instance and exercises its discretion to deny the amendment.

II. Discussion

“The decision whether to grant leave to amend a complaint is within the sole discretion of the district court.” Laurie v. Ala. Ct. Crim. Apps., 256 F.3d 1266, 1274 (11th Cir. 2001). “The court should freely give leave when justice so requires.” Fed. R. Civ. P. 15(a)(2). Justice does not require amendment in several instances, “includ[ing] undue delay, bad faith, dilatory motive

on the part of the movant, . . . undue prejudice to the opposing party by virtue of allowance of the amendment, [and] futility of amendment.” Laurie, 256 F.3d at 1274 (quoting Foman v. Davis, 371 U.S. 178, 182 (1962)). In addition to considering the effect of amendment on the parties, the court must consider “the importance of the amendment on the proper determination of the merits of a dispute.” 6 Wright & Miller, Fed. Prac. & Fed. P. § 1488, p. 814 (3d ed. 2010). Justice does not require amendment where the addition of parties with duplicative claims will not materially advance the resolution of the litigation on the merits. See Herring v. Delta Air Lines, Inc., 894 F.2d 1020, 1024 (9th Cir. 1989).

A. Rule 21 Motion

Jane Doe 3 and Jane Doe 4’s first attempt to join in this proceeding was brought under Rule 21. (DE 280). “If parties seek to add a party under Rule 21, courts generally use the standard of Rule 15, governing amendments to pleadings, to determine whether to allow the addition.” 12 Wright & Miller, Fed. Prac. & Fed. P., p. 432 (3d ed. 2013); see also Galustian v. Peter, 591 F.3d 724, 729-30 (4th Cir. 2010) (collecting cases and noting that Rule 15(a) applies to amendments seeking to add parties); Frank v. U.S. West, Inc., 3 F.3d 1357, 1365 (10th Cir. 1993) (“A motion to add a party is governed by Fed. R. Civ. P. 15(a) . . .”).

Rule 21, “Misjoinder and Non-joinder of Parties,” provides the court with a tool for correcting the “misjoinder” of parties that would otherwise result in dismissal. Fed. R. Civ. P. 21. Insofar as Rule 21 “relates to the addition of parties, it is intended to permit the bringing in of a person, who through inadvertence, mistake or for some other reason, had not been made a party and whose presence as a party is later found necessary or desirable.” United States v. Com. Bank of N. Am., 31 F.R.D. 133, 135 (S.D.N.Y. 1962) (internal quotation marks omitted).

In their Rule 21 Motion, Jane Doe 3 and Jane Doe 4 do not claim that they were omitted from this proceeding due to any “inadvertence” or “mistake” by Petitioners; rather, they seek to join this proceeding as parties that could have been permissively joined in the original petition under Rule 20 (“Permissive Joinder of Parties”). As courts generally use the standards of Rule 15 to evaluate such circumstances, the Court will consider the joinder issue as presented in the Rule 15 Motion.¹ The Court will consider the arguments presented in the Rule 21 Motion as if they are set forth in the Rule 15 Motion as well. Because the arguments are presented in the Rule 15 Motion (and because the Court is denying the Rule 15 Motion on its merits, as discussed below), the Rule 21 Motion will be denied.

The Court also concludes that portions of the Rule 21 Motion and related filings should be stricken from the record. Pending for this Court’s consideration is a Motion for Limited Intervention filed by Alan M. Dershowitz, who seeks to intervene to “strike the outrageous and impertinent allegations made against him and [to] request[] a show cause order to the attorneys that have made them.” (DE 282 at 1). The Court has considered Mr. Dershowitz’s arguments, but it finds that his intervention is unnecessary as Federal Rule of Civil Procedure 12(f) empowers the Court “on its own” to “strike from a pleading an insufficient defense or any redundant, immaterial, impertinent, or scandalous matter.” Fed. R. Civ. P. 12(f).

Petitioners’ Rule 21 Motion consists of relatively little argumentation regarding why the Court should permit them to join in this action: they argue that (1) they were sexually abused by

¹ The Court notes that, regardless of which motion it considers, the same standard governs the addition of parties under Rule 21 and Rule 15. See Goston v. Potter, No. 08-cv-478 FJS ATB, 2010 WL 4774238, at *5 (N.D.N.Y. 2010) (citing Bridgeport Music, Inc. v. Universal Music Grp., Inc., 248 F.R.D. 408, 412 (S.D.N.Y. 2008)).

Jeffrey Epstein, and (2) the Government violated their CVRA rights by concealing the non-prosecution agreement with them. (DE 280 at 3; see id. at 7-8). However, the bulk of the Rule 21 Motion consists of copious factual details that Jane Doe 3 and Jane Doe 4 “would prove” “[i]f allowed to join this action.” (Id. at 3, 7). Specifically, Jane Doe 3 proffers that she could prove the circumstances under which a non-party introduced her to Mr. Epstein, and how Mr. Epstein sexually trafficked her to several high-profile non-party individuals, “including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders.” (Id. at 3-6). She names several individuals, and she offers details about the type of sex acts performed and where they took place. (See id. at 5).²

At this juncture in the proceedings, these lurid details are unnecessary to the determination of whether Jane Doe 3 and Jane Doe 4 should be permitted to join Petitioners’ claim that the Government violated their rights under the CVRA. The factual details regarding with whom and where the Jane Does engaged in sexual activities are immaterial and impertinent to this central claim (i.e., that they were known victims of Mr. Epstein and the Government owed them CVRA duties), especially considering that these details involve non-parties who are not related to the respondent Government. These unnecessary details shall be stricken.

The original Rule 21 Motion (DE 279) shall be stricken in its entirety, as it is wholly superseded by the “corrected” version of the Rule 21 Motion (DE 280). From the corrected Rule 21 Motion, the Court shall strike all factual details regarding Jane Doe 3 between the following sentences: “The Government then concealed from Jane Doe #3 the existence of its NPA from

² Jane Doe 4’s proffer is limited to sexual acts between Mr. Epstein and herself. (See DE 280 at 7-8).

Jane Doe #3, in violation of her rights under the CVRA” (id. at 3); and “The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA” (id. at 6). As none of Jane Doe 4’s factual details relate to non-parties, the Court finds it unnecessary to strike the portion of the Rule 21 Motion related to her circumstances. Regarding the Declaration in support of Petitioners’ response to Mr. Dershowitz’s motion to intervene (DE 291-1), the Court shall strike paragraphs 4, 5, 7, 11, 13, 15, 19 through 53, and 59, as they contain impertinent details regarding non-parties. Regarding the Declaration of Jane Doe 3 in support of the Rule 21 Motion (DE 310-1), the Court shall strike paragraphs 7 through 12, 16, 39, and 49, as they contain impertinent details regarding non-parties. Jane Doe 3 is free to reassert these factual details through proper evidentiary proof, should Petitioners demonstrate a good faith basis for believing that such details are pertinent to a matter presented for the Court’s consideration.

As mentioned, Mr. Dershowitz moves to intervene “for the limited purposes of moving to strike the outrageous and impertinent allegations made against him and requesting a show cause order to the attorneys that have made them.” (DE 282 at 1). As the Court has taken it upon itself to strike the impertinent factual details from the Rule 21 Motion and related filings, the Court concludes that Mr. Dershowitz’s intervention in this case is unnecessary. Accordingly, his motion to intervene will be denied as moot.³ Regarding whether a show cause order should

³ This also moots Mr. Dershowitz’s Motion for Leave to File Supplemental Reply in Support of Motion for Limited Intervention. (DE 317). Denying Mr. Dershowitz’s motion to intervene also renders moot Petitioners’ motion (DE 292) to file a sealed document supporting its response to Mr. Dershowitz’s motion. It will accordingly be denied as moot, and DE 293 (the sealed response) will be stricken from the record.

issue, the Court finds that its action of striking the lurid details from Petitioners' submissions is sanction enough. However, the Court cautions that all counsel are subject to Rule 11's mandate that all submissions be presented for a proper purpose and factual contentions have evidentiary support, Fed. R. Civ. P. 11(b)(1) and (3), and that the Court may, on its own, strike from any pleading "any redundant, immaterial, impertinent, or scandalous matter," Fed. R. Civ. P. 12(f).

B. Rule 15 Motion

Between their two motions (the Rule 21 Motion and Rule 15 Motion), Jane Doe 3 and Jane Doe 4 assert that "they desire to join in this action to vindicate their rights [under the CVRA] as well." (DE 280 at 1). Although Petitioners already seek the invalidation of Mr. Epstein's non-prosecution agreement on behalf of all "other similarly-situated victims" (DE 189 at 1; DE 311 at 2, 12, 15, 18-19), Jane Doe 3 and Jane Doe 4 argue that they should be fellow travelers in this pursuit, lest they "be forced to file a separate suit raising their claims" resulting in "duplicative litigation" (DE 280 at 11). The Court finds that justice does not require adding new parties this late in the proceedings who will raise claims that are admittedly "duplicative" of the claims already presented by Petitioners.

The Does' submissions demonstrate that it is entirely unnecessary for Jane Doe 3 and Jane Doe 4 to proceed as parties in this action, rather than as fact witnesses available to offer relevant, admissible, and non-cumulative testimony. (See, e.g., DE 280 at 2 (Jane Doe 3 and Jane Doe 4 "are in many respects similarly situated to the current victims"), 9 ("The new victims will establish at trial that the Government violated their CVRA rights in the same way as it violated the rights of the other victims."), 10 (Jane Doe 3 and Jane Doe 4 "will simply join in motions that the current victims were going to file in any event."), 11 (litigating Jane Doe 3 and

Jane Doe 4's claims would be "duplicative"); DE 298 at 1 n.1 ("As promised . . . Jane Doe No. 3 and Jane Doe No. 4 do not seek to expand the number of pleadings filed in this case. If allowed to join this action, they would simply support the pleadings already being filed by Jane Doe No. 1 and Jane Doe No. 2."); DE 311 at 5 n.3 ("[A]ll four victims (represented by the same legal counsel) intend to coordinate efforts and avoid duplicative pleadings."), 15 (Jane Doe 3 and Jane Doe 4 "challenge the same secret agreement i.e., the NPA that the Government executed with Epstein and then concealed from the victims. This is made clear by the proposed amendment itself, in which all four victims simply allege the same general facts.")). As the Does argue at length in their Rule 15 Motion, Jane Doe 1's original petition "specifically allege[s] that the Government was violating not only her rights but the rights of other similarly-situated victims." (DE 311 at 2). The Court fails to see why the addition of "other similarly-situated victims" is now necessary to "vindicate their rights as well." (DE 280 at 1).

Of course, Jane Doe 3 and Jane Doe 4 can participate in this litigated effort to vindicate the rights of similarly situated victims there is no requirement that the evidentiary proof submitted in this case come only from the named parties. Petitioners point out as much, noting that, regardless of whether this Court grants the Rule 15 Motion, "they will call Jane Doe No. 3 as a witness at any trial." (DE 311 at 17 n.7). The necessary "participation" of Jane Doe 3 and Jane Doe 4 in this case can be satisfied by offering their properly supported and relevant, admissible, and non-cumulative testimony as needed, whether through testimony at trial (see DE 280 at 9) or affidavits submitted to support the relevancy of discovery requests⁴ (see

⁴ The non-party Jane Does clearly understand how to submit affidavits. (See DEs 291-1, 310-1).

id. at 10). Petitioners do not contend that Jane Doe 3 and Jane Doe 4’s “participation in this case” can only be achieved by listing them as parties.

As it stands under the original petition, the merits of this case will be decided based on a determination of whether the Government violated the rights of Jane Doe 1, Jane Doe 2, and all “other similarly situated victims” under the CVRA. Jane Doe 3 and Jane Doe 4 may offer relevant, admissible, and non-cumulative evidence that advances that determination, but their participation as listed parties is not necessary in that regard. See Herring, 894 F.2d at 1024 (District court did not abuse its discretion by denying amendment where “addition of more plaintiffs . . . would not have affected the issues underlying the grant of summary judgment.”); cf. Arthur v. Stern, 2008 WL 2620116, at *7 (S.D. Tex. 2008) (Under Rule 15, “courts have held that leave to amend to assert a claim already at issue in [another lawsuit] should not be granted if the same parties are involved, the same substantive claim is raised, and the same relief is sought.”).⁵ And, as to Jane Doe 4 at least, adding her as a party raises unnecessary questions about whether she is a proper party to this action.⁶

Petitioners also admit that amending the petition to conform to the evidence by including references to the non-prosecution agreement itself is “unnecessary” as the “existing petition is broad enough to cover the developing evidence in this case.” (DE 311). The Court

⁵ The Court expresses no opinion at this time whether any of the attestations made by Jane Doe 3 and Jane Doe 4 in support of their motion will be relevant, admissible, and non-cumulative.

⁶ The Government contends that Jane Doe 4 is not a true “victim” in this case because she was not known at the time the Government negotiated the non-prosecution agreement, and accordingly she was not entitled to notification rights under the CVRA. (See DE 290 at 10). Any “duplicative” litigation filed by Jane Doe 4 would necessarily raise the issue of whether she has standing under the CVRA under these circumstances.

agrees, and it concludes that justice does not require amending the petition this late in the proceedings.

III. Conclusion

Accordingly, it is hereby **ORDERED AND ADJUDGED** as follows: the Rule 21 Motion (DE 280) is **DENIED**; the Rule 15 Motion (DE 311) is **DENIED**; Intervenor Dershowitz's Motion for Limited Intervention (DE 282) and Motion for Leave to File Supplemental Reply in Support of Motion for Limited Intervention (DE 317) are **DENIED AS MOOT**; Petitioners' Motion to Seal (DE 292) is **DENIED AS MOOT**; the following materials are hereby **STRICKEN** from the record:

- DE 279, in its entirety.
- DE 280, all sentences between the following sentences:
"The Government then concealed from Jane Doe #3 the existence of its NPA from Jane Doe #3, in violation of her rights under the CVRA" (DE 280 at 3); and "The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA" (DE 280 at 6).
- DE 291-1, paragraphs 4, 5, 7, 11, 13, 15, 19 through 53, and 59.
- DE 310-1, paragraphs 7 through 12, 16, 39, and 49.
- DE 293, in its entirety.

DONE AND ORDERED in chambers at West Palm Beach, Palm Beach County, Florida, this 6th day of April, 2015.



KENNETH A. MARRA
United States District Judge

EXHIBIT F

From: <ross@acuityreputation.com>
Date: 2 January 2015 at 20:38
Subject: Ghislaine Maxwell
To: Rossacuity Gow <ross@acuityreputation.com>
bcc: martin.robinson@mailonline.co.uk,
P.Peachey@independent.co.uk,
nick.sommerlad@mirror.co.uk,
david.brown@thetimes.co.uk,
nick.alway@bbc.co.uk,
jo-anne.pugh@bbc.co.uk

To Whom It May Concern,
Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.
Thanks for your understanding.
Best
Ross

Ross Gow
ACUITY Reputation

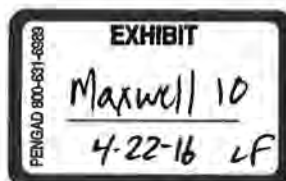
Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

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

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

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Sent from my BlackBerry® wireless device



GM_00068

EXHIBIT G

ROSS NEIL SUTHERLAND GOW - 11/18/2016

1 IN THE HIGH COURT OF JUSTICE
2 QUEEN'S BENCH DIVISION

3 Claim No. CR 2016-624

4 BETWEEN:

5 VIRGINIA L. GIUFFRE Applicant,
6 - and -
7 ROSS GOW,
8 Respondent.

9 AND:

10 UNITED STATES DISTRICT COURT
11 SOUTHERN DISTRICT OF NEW YORK

12 Virginia L. Giuffre,
13 Plaintiff,

14 v.

Case No. 15-cv-07433-RWS

15 Ghislaine Maxwell,
16 Defendant.

17 -----
Friday, November 18, 2016

18 AT: 8:27 a.m.

19 Taken at:

20
21 Essex Chambers 29,
22 81 Chancery Lane,
23 London, UK, WC2A 1DD

24 Court Reporter: Lisa Barrett, Accredited Real-time
25 Reporter

1 A P P E A R A N C E S:

2

3 Appearing for the Plaintiff:

4 MEREDITH L. SCHULTZ, ESQ.
5 BOIES, SCHILLER & FLEXNER, LLP
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Fort Lauderdale, FL 33301

7 DAVID TURNER, ESQ.
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9 25 Old Broad Street
London, UK EC2N 1HQ

10 Counsel for Defendant, Ghislaine Maxwell:

11 LAURA A. MENNIGER, P.C.
12 HADDON, MORGAN and FOREMAN, P.C.
13 150 East Tenth Avenue
Denver, CO 80203

14 Counsel for Defendant, Ross Neil Sutherland Gow
15 (witness):

16 RICHARD SPEARMAN, Q.C.
17 PHILIP BARDEN,
18 DEVONSHIRES SOLICITORS LLP
30 Finsbury Circus, London
EC2M 7DT, UK

19

20 Examiner:

21 ALLEN DYER,
22 4 Pump Court
23 Temple, London, EC4Y 7AN
24 DX 303 LDE
25

1 W I T N E S S I N D E X

2	Witness	Page
3	ROSS NEIL SUTHERLAND GOW (sworn)	10
4	Examination by Ms. Schultz	10
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6	Re-examination by Ms. Schultz	119

7

8 E X H I B I T I N D E X

9	No.	Description	Page
10	1	Consent Order before Master Fontaine	11
11	2	Email from ross@acuityreputation.com to	13
12		Ross@acuity.com, bcc:	
13		Martin.robinson@mailonline.co.uk,	
14		P.Peachy@indepdent.co.uk,	
15		Nick.sommerland@mirror.co.uk,	
16		david.brown@thetimes.co.uk,	
17		Nick.alway@bbc.co.uk,	
18		Jo-anne.pugh@bbc.co.uk,	
19		dated 2 January 2015,	
20		Bates No. GM_00068	
21	3	Email from James Ball to Ross Gow,	30
22		dated 1 January 2015,	
23		Bates No. RG(UK)_000002	
24			
25			

1	E X H I B I T I N D E X		
2	No.	Description	Page
3	4	Email from Ross Gow to G Max,	35
4		cc Brian Basham, dated January 2, 2015,	
5		Bates No. GM_01043-44	
6	5	Email from ross@acuityreputation.com,	37
7		to G Max, sent Friday, January 2, 2015,	
8		Fw: The Times - David Brown, Bates No.	
9		GM_01038-39	
10	6	Email from ross@acuityreputation.com	38
11		to G Max, sent Friday, January 2,	
12		2015, Subject: Agreed copy,	
13		Bates Nos. GM_01036-37	
14	7	Email from ross@acuityreputation.com	40
15		to G Max, sent Friday, January 2,	
16		2015, Subject: Re: Agreed copy,	
17		Bates No. GM_01040-01041	
18	8	Email from ross@acuityreputation.com ,	42
19		dated Friday, January 2, 2015,	
20		To: G Max, Bates No. GM_01042	
21	9	Email from ross@acuityreputation.com,	44
22		dated 2 January 2015, To: G Max	
23		gmax1@ellmax.com, Cc: Philip	
24		Barden, philip.barden@devonshires.co.uk,	
25		Bates Nos. RG(UK) _00009	

1	E X H I B I T I N D E X		
2	No.	Description	Page
3	10	Email from gmax1@ellmax.com, sent:	50
4		Saturday January 10, 2015,	
5		To Philip Barden; Ross Gow,	
6		Bates GM_01060-68	
7	11	Email chain, latest in time from	54
8		G Maxwell to J Jep, sent	
9		Sunday, January 11, 2015, Bates Nos.	
10		GM_01069-72	
11	12	Email chain, latest in time from	60
12		E Jeffrey jeevacation@gmail.com,	
13		dated Sunday, January 11, 2015,	
14		7:15 a.m., to G Maxwell, Bates	
15		Nos. GM_01076-77	
16	13	Email chain, latest in time from	65
17		Jeffrey E jeevacation@gmail.com,	
18		sent Wednesday, January 21, 2015	
19		4:47 p.m. To: G Maxwell, Bates	
20		Nos. GM_01088-90	
21			
22			
23			
24			
25			

1	E X H I B I T I N D E X		
2	No.	Description	Page
3	14	Email chain, latest in time from	68
4		Nick Sommerlad, dated 2 January 2015,	
5		21:45, To ross@acuityreputation.com	
6		Bates Nos. RG(UK)_ 000004, one page	
7	15	Email from Ross Gow dated Saturday,	71
8		3 January 2015, To David Mercer, Bates Nos.	
9		RG(UK)_000005-08	
10	16	Email string from Ross Gow to G Max;	73
11		Philip Barden, dated Tues,	
12		February 24, 2015, Bates Nos.	
13		GM_00577 - one page	
14	17	Email from G Maxwell to Ross Gow,	75
15		dated Thurs February 26, 2015,	
16		Bates Nos. GM_00578	
17	18	Email from Ross Gow to G Maxwell,	77
18		dated Thursday, February 26, 2015,	
19		Bates Nos. GM_00579	
20	19	Email from Ross Gow to G Max;	78
21		Philip Barden, dated Wednesday,	
22		April 8, 2015, Bates Nos. GM_00580	
23			
24			
25			

ROSS NEIL SUTHERLAND GOW - 11/18/2016

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1	E X H I B I T I N D E X		
2	No.	Description	Page
3			
4	20	Email from G Max to Ross Gow;	79
5		Philip Barden, dated Wednesday,	
6		May 6, 2015, Bates Nos. GM_0058384	
7	21	Email chain, latest in time from	81
8		Ross Gow to G Maxwell; Philip Barden,	
9		dated Wednesday, May 6, 2015, Bates Nos.	
10		GM_00585-587	
11	22	Email from Ross Gow to Scott Adam,	82
12		dated Wednesday, May 6, 2015,	
13		Bates No. GM_00589-590	
14	23	Website print out Bates No.	82
15		GUIFFRE008453	
16	24	Website printout, Bates Nos.	93
17		GUIFFRE008454-455 - two pages	
18	25	Email from Ross Gow to G Max,	100
19		Philip Barden, Bates Nos. GM_00594	
20	26	Website screenshot printout of	109
21		Acuity Reputation - two pages	
22			
23			
24			
25			

1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Here begins video card
3 number 1, volume I, in the video deposition of Ross Gow.

4 This is taken in the matter of Virgina Guiffre
5 and Ross Gow. This is being heard in the High Court of
6 Justice, Queen's Bench Division, Senior Master, claim
7 number CR-21016-624.

8 Today's date is November 18, 2016. The time on
9 the video screen is 08:26 a.m., local time in London.

10 The video operator today is Phillip Hill from
11 DTI Court Reporting Solutions.

12 The court reporter is Lisa Barrett from DTI
13 Court Reporting Solutions.

14 This video deposition is taking place at the
15 Essex Chambers in London.

16 I will now hand over the proceedings to the
17 Examiner. Thank you, sir.

18 MR. DYER: Would counsel or lawyers present,
19 please identify themselves for the record, first?

20 MS. SCHULTZ: I'm Meredith Schultz from Boise
21 Schiller and Flexner LLP, appearing for the Plaintiff,
22 Ms. Virginia Guiffre. With me is my colleague, David
23 Turner, also from Boies, Schiller and Flexner LLP.

24 MS. MENNINGER: I'm Laura Menninger from
25 Haddon, Morgan and Foreman on behalf of Ghislaine

1 worse objection, or worse grounds for me.

08:56:26

2 MR. DYER: I think questions of payment do not
3 fall within the scope.

08:56:28

08:56:30

4 BY MS. SCHULTZ:

08:56:38

5 Q. Okay. Are you currently retained by Ms.
6 Maxwell for professional services.

08:56:38

08:56:39

7 A. If I could go back to my previous answer, Ms.
8 Maxwell is a project client, and it's on a day rate. If
9 -- so, for the sake of argument between 2nd of
10 January 2015 and the 1st of February 2016 we were quite
11 busy answering these incoming calls, so there was quite a
12 lot of work at that point in time. Recently there's been
13 no work. There's been no need because the press activity
14 has died down, our function is somewhat redundant.

08:56:42

08:56:46

08:56:55

08:56:57

08:57:03

08:57:06

08:57:08

08:57:12

15 Q. Can you estimate the last time that you worked
16 on this account at your day rate?

08:57:15

08:57:17

17 A. It would have been in 2015. Probably April,
18 May, something like that. No invoices, no -- no payment
19 in 2016 from my recollection.

08:57:30

08:57:35

08:57:41

20 BY MS. SCHULTZ:

08:57:47

21 Q. Mr. Gow, I'm going to hand you another
22 document.

08:57:47

08:57:49

23 (Exhibit 3 was marked for identification.)

08:30:48

24 MS. SCHULTZ: Point of procedure: I have only
25 three copies of these documents for each of the

08:58:09

08:58:11

1 remaining, so... 08:58:14

2 I've marked as Exhibit 3 RG(UK)_00002. Do you 08:58:15

3 recognize this email? 08:58:47

4 A. I do. 08:58:48

5 Q. Did you receive this email? 08:58:49

6 A. I did, on the -- on New Year's Day 2015. 08:58:50

7 Q. Did you contact Ms. Maxwell after receiving 08:58:57

8 this email? 08:58:58

9 A. I did. 08:58:59

10 Q. Did you make any response to Mr. Ball in any 08:59:19

11 form? 08:59:22

12 A. I did. 08:59:22

13 Q. Can you tell me what you -- what response you 08:59:25

14 made? 08:59:26

15 A. Well, the response to Mr. Ball was part of a 08:59:27

16 series of responses having spoken to my client within 24 08:59:33

17 hours or so, we got back to Mr. Ball with an agreed 08:59:41

18 statement which went out to a number of media. 08:59:44

19 Q. When you say "agreed statement" can you tell me 08:59:50

20 more about what you mean? Who agreed to the statement? 08:59:52

21 A. I need to give you some context, if I may, 08:59:58

22 about that statement. 09:00:01

23 So, this is on New Year's Day. I was 09:00:02

24 in France so the email time here of 21:46, in French 09:00:04

25 time was 22:46, and I was getting up early the next 09:00:10

1 morning to drive my family back from the south of 09:00:14
2 France to England, which is a 14-hour journey, door to 09:00:17
3 door. So on the morning of the 2nd of January, 09:00:22
4 bearing in mind that Ms. Maxwell, I think was in New 09:00:26
5 York then, she was five hours behind, so there was 09:00:28
6 quite a lot of, sort of time difference between the 09:00:30
7 various countries here, I sent her an email, I 09:00:35
8 believe, saying -- parsing this -- forwarding this 09:00:38
9 email to her saying "How do you wish to proceed?" And 09:00:41
10 then I was on the telephone -- I had two telephones in 09:00:45
11 the car, I received in excess of 30 phone calls from 09:00:50
12 various media outlets on the 2nd of January, all 09:00:54
13 asking for information about how Ms. Maxwell was 09:01:00
14 looking to respond to the latest court filings, which 09:01:04
15 were filed on the 30th of December as I understand. 09:01:10
16 And by close -- towards close of play 09:01:13
17 on the 2nd, I received an email forwarded by 09:01:16
18 Ms. Maxwell, containing a draft statement which my 09:01:33
19 understanding was the majority of which had been 09:01:36
20 drafted by Mr. Barden with a header along the lines of 09:01:39
21 "This is the agreed statement." At close of play on 09:01:44
22 the 2nd. 09:01:48
23 So I -- I was -- I had gone under the 09:01:50
24 Channel Tunnel and I was sitting on the other side and 09:01:54
25 that email, which my understanding was that it had 09:01:57

1 been signed off by the client, effectively, was then 09:02:01
2 sent out to a number of media, including Mr. Ball and 09:02:05
3 various other UK newspapers. 09:02:09

4 Q. Mr. Gow, when you say "end of play" and "close 09:02:12
5 of play," are you referring to sending the email that's 09:02:15
6 Exhibit 2? 09:02:18

7 A. Yes, I am. 09:02:24

8 MR. DYER: My understanding is that it went to 09:02:29
9 people other than those listed? 09:02:30

10 THE WITNESS: Yes, that is -- 09:02:32

11 MR. DYER: Just a sample. 09:02:34

12 THE WITNESS: That is a sample. Everyone who 09:02:35
13 effectively -- well, the detail on this, I was driving, 09:02:37
14 so my eldest son in the back had my BlackBerry and was 09:02:40
15 trying to capture -- it was a pretty chaotic day. 09:02:43

16 Most people in the UK were on holiday. In fact, 09:02:48
17 it was a holiday weekend, our office was closed, my PA was 09:02:50
18 on holiday, so my son was basically doing an internship in 09:02:54
19 the back of the car, downloading the names of the callers 09:02:58
20 from various media outlets and -- so we had a list of 09:03:02
21 those so when I got to the car park, at the end of the 09:03:05
22 Eurotunnel thing in the UK, I had numerous names, so the 09:03:09
23 email went out to a wide range of people. 09:03:14

24 But the 30 or so calls I had is an aggregate 09:03:17
25 number, so there might have been five calls from the BBC 09:03:20

1 from different people so they -- the BBC would only write 09:03:24
2 one story, there wouldn't be five versions of it, so 30 is 09:03:27
3 an aggregate number. 09:03:31

4 BY MS. SCHULTZ: 09:03:34

5 Q. Okay. Looking again at Exhibit 2, could you 09:03:35
6 please review the individuals or email addresses of 09:03:37
7 the -- listed in the "To" and "bcc" portion? 09:03:41

8 A. Yep. 09:03:50

9 Q. Did you send this written statement to any 09:03:51
10 other individuals or entities who are not listed in that 09:03:53
11 portion? 09:03:57

12 A. Within -- within 24 hours of this, yes, a wider 09:03:58
13 range of people, definitely. 09:04:03

14 This was the initial -- these are the 09:04:05
15 most pressing ones, who said they were going to write 09:04:07
16 a story whether they had -- if I could just explain a 09:04:10
17 bit more context again in the world of PR. When you 09:04:13
18 are in the field you're engaged and you've just -- 09:04:16
19 you've got to prioritize who you spoke to and whoever 09:04:19
20 shouts the loudest usually gets responded to first. 09:04:22

21 So the reason there are two BBC people 09:04:25
22 there for instance, is there's BBC broadcast radio, 09:04:27
23 and BBC TV, and they were coming at -- from different 09:04:30
24 angles for different stories, but there was a certain 09:04:35
25 sense of urgency and immediacy. So the half a dozen 09:04:38

1 or so here were the ones that we prioritized to deal 09:04:44
2 with that night because they were publishing the next 09:04:46
3 day or -- or thereabouts, but for instance we also 09:04:49
4 spoke to the Daily Express. I can't remember the name 09:04:52
5 of the gentleman there, or the lady, but I remember 09:04:56
6 that was early the next morning when we got on to 09:04:58
7 other channels. 09:05:04

8 Q. So you sent this statement to additional 09:05:06
9 individuals on January 3rd? 09:05:09

10 A. Not just on January 3rd. I mean, as we had an 09:05:13
11 agreed statement there, and I do recall there is a typo 09:05:16
12 in this which is "Virginia" and "Victoria" -- there was a 09:05:20
13 transposition there. So the original email went out with 09:05:24
14 the typo because that was taken from the -- the statement 09:05:28
15 that I believe Mr. Barden was broadly the architect of, 09:05:35
16 but forwarded by Ms. Maxwell. So I just -- I took that 09:05:42
17 as a verbatim statement and sent it out. I re-read it in 09:05:45
18 the calm light of day the next morning. There was at 09:05:50
19 least one typo in it so I changed that and reached out, 09:05:52
20 again, to these people, updating the typo and sent it out 09:05:57
21 to additional people. 09:06:07

22 BY MS. SCHULTZ: 09:06:09

23 Q. Mr. Gow, I'm going to hand you another 09:06:15
24 document. I'm going to mark this as Exhibit 4. 09:06:17

25 (Exhibit 4 was marked for identification.) 09:06:26

1 BY MS. SCHULTZ: 09:06:28

2 Q. This is a document that is Bates labeled 09:06:31

3 GM_01043. 09:06:34

4 A. Thank you. 09:06:38

5 Q. The top email on this document says "From: Ross 09:06:59

6 Gow." Did you send this email? 09:07:02

7 A. I believe I did, yes. 09:07:07

8 Q. Did you send it to Ms. Maxwell? 09:07:08

9 A. Yes. 09:07:09

10 Q. In the "To" field, when it says "G Max," do you 09:07:11

11 recognize that to be Ms. Maxwell's email address? 09:07:18

12 A. Yes. 09:07:23

13 Q. In the second paragraph of this email it 09:07:37

14 states: 09:07:39

15 "Please advise how you wish to handle this." [As 09:07:40

16 read] 09:07:43

17 Did you receive a response from Ms. Maxwell? 09:07:43

18 A. Bearing in mind I was driving all that day, I 09:07:47

19 can't recall what the exact response was but from memory, 09:07:52

20 it was along the lines of she would get back to me with 09:07:57

21 how she wished to proceed. 09:08:03

22 BY MS. SCHULTZ: 09:08:04

23 Q. Okay. 09:08:25

24 Mr. Gow, I'm going to hand you another 09:08:26

25 document. I'm going to mark it as Exhibit 5. 09:08:27

1 had existing authorization to make statements on 11:39:08
2 Ms. Maxwell's behalf due to the reauthorization 11:39:11
3 letter; is that correct? 11:39:14

4 A. I believe that from the 2nd of January 2015, 11:39:15
5 I had an ongoing re-established authority to represent 11:39:20
6 her, within the parameters of the 2011, 2015 press 11:39:23
7 releases, there or thereabouts. 11:39:30

8 MS. SCHULTZ: Mr. Dyer, I have no further 11:39:35
9 questions. 11:39:36

10 MR. DYER: Thank you. That concludes your 11:39:38
11 deposition. 11:39:39

12 THE WITNESS: Thank you, sir. 11:39:40

13 MR. DYER: Thank you very much. 11:39:41

14 THE VIDEOGRAPHER: Going off the record, the
15 time is 11:39. End of video card number 3, volume I, and
16 end of the video deposition of Ross Gow.

17 (Whereupon, the deposition concluded at 11:39
18 a.m.)

19

20

21

22

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25

Lisa Barrett

Lisa Barrett, RPR, CRR, CRC, CSR
Certified Real-time Court Reporter

1 Subscribed and sworn to before me this
2 20th day of November, 2016.

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Draft Only

1 CERTIFICATE OF DEPONENT

2

3 I, ROSS NEIL SUTHERLAND GOW, hereby certify that I
4 have read the foregoing pages, numbered 1 through 122
5 of my deposition of testimony taken in these
6 proceedings on this 18th day of November, 2016 and
7 with the exception of the changes listed on the next.
8 page and/or corrections, if any, find them to be
9 a true and accurate transcription thereof.

10

11 Signed:

12 Name: ROSS NEIL SUTHERLAND GOW

13 Date:

14

15

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25

1 CERTIFICATE OF EXAMINER

2 I, ALLEN DYER, of 4 Pump Court
3 Temple, London, EC4Y 7AN DX 303 LDE have been
4 appointed as Examiner herein pursuant to an Order of
5 Master Fontaine dated 29 September 2016. It has been
6 agreed by all parties herein that the evidence of the
7 witness, ROSS NEIL SUTHERLAND GOW, should be taken
8 down in shorthand and that the transcript of the said
9 notes of evidence should be deemed to be the
10 deposition of the said witness.

11
12 I certify that, the oath having been duly
13 administered, the witness has been examined pursuant
14 to the said order. The pages of transcript annexed
15 hereto were furnished to me by DTI, Lisa Barrett,
16 Accredited Real-time Reporter, as containing the
17 transcript of the notes of the evidence of the witness
18 pursuant to the order.

19

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1 CERTIFICATE OF DEPONENT

2

3 I, Ross Neil Sutherland Gow, hereby certify that I
4 have read the foregoing pages, numbered 1 through 122,
5 of my video deposition of testimony taken in these
6 proceedings on this 18th day of November, 2016 and,
7 with the exception of the changes listed on the next
8 page and/or corrections, if any, find them to be a
9 true and accurate transcription thereof.

7

8

9 Signed:

10 Name: Ross Neil Sutherland Gow

11 Date:

12

13

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1 CERTIFICATE OF COURT REPORTER

2

3 I, Lisa M. Barrett, an Accredited Real-time Reporter,

4 hereby certify that the testimony of the witness Ross

5 Neil Sutherland Gow in the foregoing transcript,

6 numbered pages 1 through 122, taken on this 18th day

7 of November, 2016 was recorded by me in machine

8 shorthand and was thereafter transcribed by me; and

9 that the foregoing transcript is a true and accurate

10 verbatim record of the said testimony.

11

12

13 I further certify that I am not a relative, employee,

14 counsel or financially involved with any of the

15 parties to the within cause, nor am I an employee or

16 relative of any counsel for the parties, nor am I, in

17 any way, interested in the outcome of the within

18 cause.

19

20 

21 Signed:

22 Name: Lisa M. Barrett, RPR, CRR, CRC, CSR

23 Date: November 30th 2016

24

25

----- Forwarded message -----

From: James Ball <james.ball@theguardian.com>

Date: 1 January 2015 at 21:46

Subject: URGENT – Ghislaine Maxwell

To: ross@acuityreputation.com

Dear Ross,

I'm writing to you as you have in the past represented Ghislaine Maxwell. As you are no doubt aware, fresh allegations have been levelled against Ms Maxwell in new US court filings made in Florida on 30 December, which some outlets have already been reported.

I would urgently seek any comment on behalf of your client, or notification of her new representation if you no longer act for her.

Many thanks for your help,
James

Draft Only



RG(UK)_000002

From: Ross Gow <ross@acuityreputation.com>
Sent: Friday, January 02, 2015 1:07 AM
To: G Max
Cc: Brian Basham
Subject: Fwd: URGENT – Ghislaine Maxwell

Hi Ghislaine

James Ball, investigative reporter for The Guardian, who reports on US stories, has made contact, as per below.

Please advise how you wish to handle this. I am driving all day today, but can be contacted on +44 (0) 7778 755 251

Best
Ross

----- Forwarded message -----

From: James Ball <james.ball@theguardian.com>
Date: Thursday, January 1, 2015
Subject: URGENT – Ghislaine Maxwell
To: ross@acuityreputation.com

Dear Ross,

I'm writing to you as you have in the past represented Ghislaine Maxwell. As you are no doubt aware, fresh allegations have been levelled against Ms Maxwell in new US court filings made in Florida on 30 December, which some outlets have already been reported.

I would urgently seek any comment on behalf of your client, or notification of her new representation if you no longer act for her.

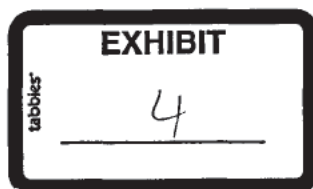
Many thanks for your help,
James

--

• James Ball • Special Projects Editor • +44 203 3533 293 • +44 7540 825 491 • @jamesrbuk •

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EXHIBIT H

This document is CONFIDENTIAL under the Court's Protective Order (DE 62)

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**PLAINTIFF'S RESPONSES AND OBJECTIONS TO DEFENDANT'S SECOND
REQUEST FOR PRODUCTION AND DEFENDANT'S INTERROGATORIES,
PLAINTIFF'S ANSWERS TO DEFENDANT'S REQUESTS FOR ADMISSION**

Pursuant to Federal Rules of Civil Procedure 26, 33, 34, Plaintiff hereby serves her responses and objections to Defendant's Second Set of Discovery Requests and serves her Answers to Defendant's Requests for Admission.

GENERAL OBJECTIONS

Defendant's Discovery Requests violate Rule 33, Fed. R. Civ. P., which provides "a party may serve on any other party no more than 25 interrogatories, including all discrete subparts" – in that Defendant has served a total of 59 interrogatories in this case, including subparts, in violation of Rule 33.

Ms. Giuffre objects to Defendant's Second Set of Discovery Requests to the extent they seek information that is protected by any applicable privilege, including but not limited to, attorney client privilege, work product privilege, joint defense privilege, public interest privilege, and any other applicable privilege.

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on hundreds (if not thousands) of matters, and collectively have well over 100 years of combined practice experience. Accordingly, a request that each of these attorneys list *all communications with the media* is facially overbroad.

Additionally, Ms. Giuffre objects to this Interrogatory because a response would cause Ms. Giuffre the incredible and undue burden of having to catalogue literally hundreds of communications that she has already produced in this case.

Moreover, Ms. Giuffre objects because this interrogatory calls for the production of documents that are irrelevant to this action and not reasonably calculated to lead to the discovery of admissible evidence. Communications with the media regarding cases that bear no relation to the subject matter of this case, from decades in the past, are facially invalid and not calculated to lead to the discovery of admissible evidence.

Ms. Giuffre additionally objects to the extent that this interrogatory seeks the communications of her attorneys, any author, reporter, correspondent, columnist, writer, commentator, investigative journalist, photojournalist, newspaper person, freelance reporter, stringer, or any other employee of any media organization or independent consultant as such interrogatory is overly broad and unduly burdensome. Furthermore, Ms. Giuffre is not obligated to produce anything currently in the possession of Defendant Maxwell or her attorneys.

Notwithstanding such objections, Ms. Giuffre has already produced her responsive communications, which are found in documents Bates labelled GIUFFRE000001 to GIUFFRE007566.

6. Identify any "false statements" attributed to Ghislaine Maxwell which were "published globally, including within the Southern District of New York" as You contend in paragraph 9 of Count I of Your Complaint, including:

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- a. the exact false statement;
- b. the date of its publication;
- c. the publishing entity and title of any publication containing the purportedly false statement;
- d. the URL or internet address for any internet version of such publication; and the nature of the publication, whether in print, internet, broadcast or some other form of media.

Response to Interrogatory No. 6:

Ms. Giuffre objects because the information interrogatory above *is in the possession of Defendant* who has failed to comply with her production obligations in this matter, and has failed to comply with her production obligations with this very subject matter. *See* Document Request No. 17 from Ms. Giuffre's Second Request for Production of Documents to Defendant Ghislaine Maxwell.¹ Maxwell has not produced all "URL or Internet addresses for any internet version of such publication" that she directed her agent, Ross Gow, to send.

¹ Request No. 17 stated: Produce all documents concerning any statement made by You or on Your behalf to the press or any other group or individual, including draft statements, concerning Ms. Giuffre, by You, Ross Gow, or any other individual, from 2005 to the present, including the dates of any publications, and if published online, the Uniform Resource Identifier (URL) address. In response, Defendant stated: "Ms. Maxwell objects to this Request on the grounds that it is cumulative and duplicative. Ms. Maxwell also objects to this Request to the extent it calls for information that exists within the public domain, the internet or in public court records and which are equally available to both parties and can be obtained from some other source that is more convenient, less burdensome, and less expensive. Ms. Maxwell further objects to this Request to the extent it seeks documents or information protected by the attorney/client privilege, the work-product doctrine, or any other applicable privilege. Ms. Maxwell is not producing documents that are available in the public domain. Ms. Maxwell has been unable to locate any additional documents responsive to this Request."

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Ms. Giuffre further objects because the information requested above *is in the possession of Defendant's agent*, who caused the false statements to be issued to various media outlets. Ms. Giuffre has not had the opportunity to depose Maxwell's agent Ross Gow; therefore, this answer remains incomplete. Consequently, Ms. Giuffre reserves the right to modify and/or supplement her responses, as information is largely in the possession of the Defendant and her agent.

Ms. Giuffre objects to this interrogatory in that it violates Rule 33 as its subparts, in combination with the other interrogatories, exceed the allowable twenty-five interrogatories. Ms. Giuffre objects to this request because it is in the public domain. Ms. Giuffre also objects in that it seeks information protected by the attorney-client/work product privilege, and any other applicable privilege stated in the General Objections.

Notwithstanding such objections, Ms. Giuffre has already produced documents responsive to this request; Bates labelled GIUFFRE000001 to GIUFFRE007566, and supplements such responsive documents with the following list of publications. While the identification of an exhaustive responsive list would be unduly burdensome, in an effort to make a good faith effort towards compliance, Ms. Giuffre provides the following examples, which are incomplete based on the aforementioned reasons:

Date	Nature	Publishing Entity	Statement/URL
January 2, 2015	Internet	Ross Gow	<p>Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.</p> <p>Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms. Roberts that Alan Dershowitz is involved in having sexual relations with her, which he denies.</p> <p>Ms. Roberts's claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory.</p> <p>Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at</p>

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			the repetition of such old defamatory claims.
January 3, 2015	Internet	Telegraph	http://www.telegraph.co.uk/news/uknews/theroyalfamily/11323872/Prince-Andrew-denies-having-relations-with-sex-slave-girl.html
January 4, 2015	Internet	Express	http://www.express.co.uk/news/world/550085/Ghislaine-Maxwell-Jeffrey-Epstein-not-madam-paedophile-Florida-court-case-Prince-Andrew
January 3, 2015	Internet	Daily Mail	http://www.dailymail.co.uk/news/article-2895366/Prince-Andrew-lobbied-government-easy-Jeffrey-Epstein-Palace-denies-claims-royal-tried-use-influence-help-billionaire-paedophile-2008-police-probe.html
January 3, 2015	Internet	Huffington Post	http://www.huffingtonpost.co.uk/2015/01/03/duke-of-york-sex-abuse-claims_n_6409508.html
January 4, 2015	Internet	Jewish News Online	http://www.jewishnews.co.uk/dershowitz-nothing-prince-andrews-sex-scandal/
January 2, 2015	Internet	Bolton News	http://www.theboltonnews.co.uk/news/national/11700192.Palace_denies_Andrew_sex_case_claim/
January 5, 2015	Internet / Broadcast	NY Daily News	http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505
January 5, 2015	Internet / Broadcast	AOL UK	http://www.aol.co.uk/video/ghislaine-maxwell-declines-to-comment-on-prince-andrew-allegations-518587500/

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Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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University of Utah
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 1, 2016, I electronically sent the foregoing document to the counsel below via e-mail.

Laura A. Menninger, Esq.
Jeffrey Pagliuca, Esq.
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150 East 10th Avenue
Denver, Colorado 80203
Tel: (303) 831-7364
Fax: (303) 832-2628
Email: lmenninger@hmflaw.com

EXHIBIT I

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**PLAINTIFF'S SUPPLEMENTAL RESPONSES TO
DEFENDANT'S INTERROGATORIES 6, 12 and 13**

Pursuant to Federal Rules of Civil Procedure 26, 33, 34, Plaintiff hereby serves her supplemental responses to Defendant's Interrogatories 6, 12 and 13.

OBJECTIONS

Plaintiff maintains and hereby incorporates by reference all applicable objections, including both general objections and specific objections to individual interrogatories, in her prior responses and objections served on Defendant in these supplemental responses.

Defendant's Discovery Requests violate Rule 33, Fed. R. Civ. P., which provides "a party may serve on any other party no more than 25 interrogatories, including all discrete subparts" – in that Defendant has served a total of 59 interrogatories in this case, including subparts, in violation of Rule 33.

Ms. Giuffre objects to Defendant's Discovery Requests to the extent they seek information that is protected by any applicable privilege, including but not limited to, attorney client privilege, work product privilege, and any other applicable privilege.

Jane Doe No. 102 v. Jeffrey Epstein, Case No. 09-80656-CIV-Marra/Johnson (Southern District of Florida). Accordingly, due to the undue burden of individually logging responsive, privileged documents related to Defendant's overly-broad requests, Plaintiff has employed categorical logging of such privileged responsive documents pursuant to Local Civil Rule 26.2(c).

Ms. Giuffre objects to the requests in that they seek to invade her privacy for the sole purpose of harassing and intimidating Ms. Giuffre who was a minor victim of sexual trafficking.

Ms. Giuffre objects to the requests to the extent they are overly broad and unduly burdensome.

Ms. Giuffre's responses to Defendant's Second Set of Discovery Requests are being made after reasonable inquiry into the relevant facts, and are based only upon the information and documentation that is presently known to her. Ms. Giuffre reserves the right to modify and/or supplement her responses. Ms. Giuffre has produced documents and information in response to these Requests.

Ms. Giuffre incorporates her above-listed general objections in the responses herein.

SUPPLEMENTAL INTEROGATORY RESPONSES

6. Identify any "false statements" attributed to Ghislaine Maxwell which were "published globally, including within the Southern District of New York" as You contend in paragraph 9 of Court 1 of Your Complaint, including:

- a. the exact false statement;
- b. the date of its publication;
- c. the publishing entity and title of any publication containing the purportedly false statement;
- d. the URL or internet address for any internet version of such publication; and
- e. the nature of the publication, whether in print, internet, broadcast or some other form of media.

In addition to her previous response, Ms. Giuffre supplements the response to include:

January 8, 2015	Internet	The Sun	https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/?CMP=spklr-128508300-Editorial-TWITTER-TheSunNewspaper-20150108-News
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12. Identify any Health Care Provider from whom You received any treatment for any physical, mental or emotional condition, including addiction to alcohol, prescription or illegal drugs, that You suffered from subsequent to the Alleged Defamation by Ghislaine Maxwell, including:

- a. the Health Care Provider's name, address, and telephone number;
- b. the type of consultation, examination, or treatment provided;
- c. the dates You received consultation, examination, or treatment;
- d. whether such treatment was on an in-patient or out-patient basis;
- e. the medical expenses to date;
- f. whether health insurance or some other person or organization or entity has paid for the medical expenses; and
- g. for each such Health Care Provider, please execute the medical and mental health records release attached hereto as Exhibit A.

Supplemental Response to Interrogatory No. 12:

Ms. Giuffre objects to this interrogatory in that it is overbroad and not limited in scope to the medical information relating to the abuse she suffered from Defendant and Jeffrey Epstein.

Pursuant to the Rules, if requested documents are not yielded in a "reasonable inquiry," Ms. Giuffre is not obligated to expend all of her time and resources on a quest to gather medical files that are unknown to her or unaccessable after reasonable inquiry. *See, e.g., Manassis v. New York City Dep't of Transp.*, No. 02 CIV. 359SASDF, 2002 WL 31115032, at *2 (S.D.N.Y. Sept. 24, 2002)

- **Medicare Australia** provided health care insurance coverage and payment for services received in Australia from July 19, 2013 through the present.⁵ Ms. Giuffre's claims history for this period is detailed at GIUFFRE007619-7620.
- **Dr. Wah Wah San**, Central Coast Family Medicine, Unit 2, 17 Anzac Rd., Tuggerah 2259, 0243518777, tel (02)4388-9540, treated Ms. Giuffre on March 14, 2013, for panic attacks as described in the medical records produced at GIUFFRE005339-5341; and possibly on September 11, 2013 for "Standard Consultation."⁶ Those records have been requested and a release sent to the provider, see GIUFFRE007625-7628.
- **CVS Pharmacy** provided prescribed medications to Ms. Giuffre as described in the records produced at GIUFFRE00843-0845. **Walgreens Pharmacy** may have provided prescribed medications to Ms. Giuffre. Those records have been requested and a release provided to the pharmacy, see GIUFFRE007611-7616.
- **Dr. Timothy D. Hartwig, D.O.** was identified in records produced by CVS pharmacy. Ms. Giuffre has requested those records, see GIUFFRE008346-8348.
- **Dr. James T. Nichols, M.D.** was identified in records produced by CVS pharmacy. Ms. Giuffre has requested those records, see GIUFFRE008349-8351.
- **Dr. Rodolfo Torres Jr., M.D.** was identified in records produced by CVS pharmacy. Ms. Giuffre has requested those records, see GIUFFRE008352-8354.

Dated: August 17, 2016.

Signed,



Virginia Giuffre

⁵ Records from Medicare Australia are generally limited to 3 years. Ms. Giuffre is continuing to pursue additional records from prior to July 19, 2013 through their offices in Australia.

⁶ Ms. Giuffre has now identified Dr. Wah Wah San and Dr. Wah San to be the same provider to the best of her knowledge. She had previously listed both names, in an abundance of caution, before learning that Dr. Wah San was the same provider as Dr. Wah Wah San.

EXHIBIT J

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRÈ,

Plaintiff,

v.

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

Declaration of Ghislaine Maxwell

I, Ghislaine Maxwell, declare as follows:

1. I am the defendant in this action.
2. I have no control or authority over any media organizations, including those media organizations that published any part of a January 2015 statement issued on my behalf at the direction of my attorney, Philip Barden.
3. Neither I nor any agent acting on my behalf approved or participated in any activity of any media organization in its decision to publish or not to publish any part of the January 2015 statement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 6, 2017.



Ghislaine Maxwell

EXHIBIT K

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

-----X VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. -----Λ	⋮	15-cv-07433-RWS
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Declaration of Philip Barden

I, Philip Barden, declare as follows:

1. I am a Solicitor of the Senior Courts of England & Wales based in London, England.
2. I am submitting this Declaration in support of Ghislaine Maxwell's motion for summary judgment in this action.
3. I am not authorised to and do not waive Ms. Maxwell's attorney-client privilege.
4. I have represented Ms. Maxwell since 2011 regarding the allegations made by Plaintiff Virginia Giuffre and as published in the United Kingdom. I continue to be retained in this regard. I am familiar generally with the subject matter of this action.
5. I first represented Ms. Maxwell in this matter over the weekend of 5th and 6th March 2011, about the time when various UK national newspapers, in hard copy and on line, published numerous and provocative allegations made by the Plaintiff Virginia Giuffre against Ms. Maxwell. The articles by Sharon Churcher were among those published in this time frame.
6. I instructed British press agent Ross Gow to assist me in representing Ms. Maxwell.

7. I caused to be prepared a statement to respond to the articles that appeared in the British Press over the weekend—March 5 and 6, 2011, and thereafter. I directed Mr. Gow to distribute the statements to various media outlets that had published articles.

8. On December 30, 2014, Ms. Giuffre made numerous salacious and improper allegations against Ms. Maxwell in a joinder motion publicly filed in a civil case involving Jeffrey Epstein. Shortly afterward, the British media gained access to the motion and began inquiring about Ms. Maxwell's response.

9. I continued to represent Ms. Maxwell at that time and I coordinated the response to the media. I again instructed Mr. Gow to assist me.

10. In liaison with Mr. Gow and my client, on January 2, 2015, I prepared a further statement denying the allegations, and I instructed Mr. Gow to transmit it via email to members of the British media who had made inquiry about plaintiff's allegations about Ms. Maxwell. Attached as Exhibit A1 is an email containing a true and correct copy of this statement. The statement was issued on my authority. Although it is possible others suggested or contributed content, I prepared the vast majority of the statement and ultimately approved and adopted all of the statement as my work.

11. As is evident from the timing and the typographical errors in the statement, I prepared the statement in haste. I was not in the office on 2nd January 2015 as it was the Friday immediately after New Years day which is a public holiday. Most people took 2nd January off and many business closed that day. I don't now recall where I was that day but I was hard to reach and that indicates I was out with my family. I therefore would have prepared the statement in a hurry. I recall that I wanted to get a statement out as a matter of urgency.

12. I recall that immediately after Ms. Giuffre's motion was filed, media representatives began contacting Mr. Gow and requesting Ms. Maxwell's response to Ms. Giuffre's allegations

of criminal and other misconduct by Ms. Maxwell. I believed an immediate response was imperative, even though this was happening in the midst of the holidays in the United Kingdom. My communications with Mr. Gow and with Ms. Maxwell were sporadic, delayed and hurried because of my and their own holiday schedules. I worked while on vacation and on Friday, January 2, 2015, to ensure that the statement was issued as soon as possible after receiving the media inquiries.

13. I did not ask Ms. Maxwell to respond point by point to Ms. Giuffre's factual allegations in the CVRA joinder motion. What we needed to do was issue an immediate denial and that necessarily had to be short and to the point. It should have been obvious to the media that Ms. Giuffre's new and significantly more salacious allegations had no credibility because they differed so substantially from her previous allegations, when she had the opportunity and incentive to disclose all relevant facts about being a victim of alleged sexual abuse and sex trafficking at the hands of the rich and powerful. I prepared the January 2015 statement based on my knowledge of Ms. Giuffre's past statements and her most recent statements in the joinder motion, and made the point to the media-recipients that she and her new statements, which differed so substantially from her former ones, were not credible—specifically, that the new allegations were patently false—i.e., “obvious lies.”

14. By way of example I recall that prior to the December 2014 filing of the joinder motion and the subsequent press reports that Ms. Guiffre clearly stated she had not had sex with Prince Andrew. Yet in her joinder motion she claimed she did have sex with Prince Andrew and that the sex occurred in what can only be described as a very small bathtub, too small for a man of Prince Andrew's size to enjoy a bath in let alone sex. So as of December 2014 it was clear Ms. Guiffre had made polar opposite statements. She was either lying when she said they did not have sex or when she said they did. I made the inescapable inference that she is a liar, as clearly

she is, since both statements cannot as a matter of fact be true. When someone says she did not have sex and then says she did, in other words, there is an obvious lie.

15. I did not intend the January 2015 statement as a traditional press release solely to disseminate information to the media. This is why I intentionally did not request that Mr. Gow or any other public relations specialist prepare or participate in preparing the statement. Instead, Mr. Gow served as my conduit to the media representatives who had requested a response to the joinder motion allegations and who I believed might republish those allegations.

16. My purpose in preparing and causing the statement to be disseminated to those media representatives was twofold. First, I wanted to mitigate the harm to Ms. Maxwell's reputation from the press's republication of plaintiff's false allegations. I believed these ends could be accomplished by suggesting to the media that, among other things, they should subject plaintiff's allegations to inquiry and scrutiny. For example, I noted that plaintiff's allegations changed dramatically over time, suggesting that they are "obvious lies" and therefore should not be "publicised as news."

17. Second, I intended the January 2015 statement to be "a shot across the bow" of the media, which I believed had been unduly eager to publish plaintiff's allegations without conducting any inquiry of their own. This was the purpose of repeatedly stating that plaintiff's allegations were "defamatory." In this sense, the statement was very much intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of plaintiff's obviously false allegations and the legal indefensibility of their own conduct.

18. It is important to understand that any story involving a member of the Royal Family, especially a senior member such as Prince Andrew, gains huge media attention in the UK and a story alleging he had a sex with the Plaintiff caused a feeding frenzy for the press. I wanted the

press to stop and think before publishing, to cease and desist, and that if they continued then they faced higher damages for ignoring my clear warning.

19. Consistent with those two purposes, Mr. Gow’s emails prefaced the statement with the following language: “Please find attached a *quotable statement* on behalf of Ms Maxwell” (italics supplied). The statement was intended to be a single, one-time-only, comprehensive response—quoted in full, if it was to be used—to plaintiff’s December 30, 2014, allegations that would give the media Ms. Maxwell’s response. The purpose of the prefatory statement was to inform the media-recipients of this intent.

20. Selective and partial quotation and use of the statement would disserve my purposes. It was intended to address Plaintiff’s behavior and allegations against Ms. Maxwell on a broad scale, that is to say, Plaintiff’s history of making false allegations and innuendo to the media against Ms. Maxwell. This is why the statement references Plaintiff’s “original allegations” and points out that her story “changes”—i.e. is embellished—over time including the allegations “now” that Professor Dershowitz allegedly had sexual relations with her. This is why I distinguished in the statement between Plaintiff’s “original” allegations and her “new,” joinder-motion allegations, which differed substantially from the original allegations. And this is why I wrote, “Each time the story is *re told* [sic] it *changes* with *new* salacious details about public figures and world leaders and *now* it is alleged by [Plaintiff] that Alan Derschowitz [sic] is involved in having sexual relations with her, which he denies.” (Emphasis supplied.) Having established the dramatic difference between Plaintiff’s two sets of allegations, which suggested she was fabricating more and more-salacious allegations as she had more time to manufacture them, I added the third paragraph: “[Ms. Giuffre’s] claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.” (Emphasis supplied.) I believed then, and believe now, that it was and remains a fair inference and conclusion that her claims

were and are “obvious lies.” As noted, her claims not to have slept with Prince Andrew and to have slept with Prince Andrew are a classic example of an obvious lie. One or other account is on the face of it a lie.

21. As an example of her lack of credibility, the Plaintiff made allegations against Professor Dershowitz, which I understand she has now withdrawn. Professor Dershowitz has credibility because his story, insofar as I am familiar with it, has been consistent; Ms. Giuffre has no credibility because her story has shifted and changed.

22. Further the Plaintiff’s account has become more salacious, for example, regarding Prince Andrew. The Plaintiff clearly has been seeking publicity for her story and it is clear to me that she understands retelling the same story doesn’t feed the media and generate publicity and so each time she appears to create new allegations to generate media interest.

23. I understand the Plaintiff alleged in her Complaint in this action that the following statements are defamatory. She alleges it was defamatory in the first paragraph of the January 2015 statement to state that “the allegations made by [the Plaintiff] against [Ms.] Maxwell are untrue.” For the reasons stated above, it was and is my considered and firm opinion that, in fact, her allegations are untrue. She alleges it was defamatory to state in the same paragraph that the “original allegations” have been “shown to be untrue.” For the reasons stated above, it was and is my considered and firm opinion that, in fact, her allegations are untrue. Finally, she alleges that it was defamatory in the third paragraph to state that her claims are “obvious lies.” For the reasons stated above, it was and is my considered and firm opinion that, in fact, her claims are obvious lies.

24. Both Mr. Gow and I understood that once the January 2015 statement was sent to the media-representatives, we had no ability to control whether or how they would use the statement and we made no effort to control whether or how they would use the statement.

25. It is my understanding that some of the media-recipients of the January 2015 statement did not publish any part of the statement. I am unaware of any media-recipient publishing the statement in full.

26. The issuance of the statement fully complied with my ethical obligations as a lawyer. Indeed it was duty in representing my client's interests to ensure that a denial was immediately issued. I would have been remiss if I had sat back and not issued a denial, and the press had published that Ms. Maxwell had not responded to enquiries and had not denied the new allegations; the public might have taken the silence as an admission there was some truth in the allegations.

27. The content of the statement was entirely based on information I acquired in connection with my role as counsel for Ms. Maxwell.

28. At the time I directed the issuance of the statement, I was contemplating litigation against the press-recipients as an additional means to mitigate and prevent harm to Ms. Maxwell. Whilst the limitation period for a pure defamation claim has now expired, claims are still being considered for example for publishing a deliberate falsehood, conspiracy to inure and other tortious acts.

29. In any such UK defamation, or other related, action Ms. Giuffre would be a defendant or a witness.

30. I directed that the statement indicate Ms. Maxwell "strongly denie[d] the allegations of an unsavoury nature," declare the allegations to be false, give the press-recipients notice that the publications of the allegations "are defamatory," and inform them that Ms. Maxwell was "reserv[ing] her right to seek redress."

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 6, 2017.



Philip Bardon

EXHIBIT L

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

VIRGINIA GIUFFRE,

Plaintiff,

vs.

GHISLAINE MAXWELL

Defendant.

VIDEO-DEPOSITION
OF:

JAMES MICHAEL AUSTRICH

TAKEN BY:

Defendant

REPORTED BY:

Karla Layfield, RMR
Stenographic Court Reporter
Notary Public
State of Florida at Large

DATE AND TIME:

June 23, 2016; 9:03 a.m.

PLACE:

Owen & Associates Court Reporters
108 N. Magnolia Avenue, Suite 501
Ocala, Florida

APPEARANCES:

Laura A. Menninger, Esquire
HADDON, MORGAN & FOREMAN, PC
150 East 10th Avenue
Denver, Colorado 80203
Attorney for Defendant

Brad Edwards, Esquire
Farmer, Jaffe, Weissing, Edwards,
FISTOS & LEHRMAN, PL
425 Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Attorney for Plaintiff

Also Present: Kenneth Sarsony, Videographer
Virginia Giuffre

Owen & Associates Court Reporters
P.O. Box 157, Ocala, Florida
352.624.2258 * owenassocs@aol.com

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(Exhibits attached.)

1 Broward and Miami a lot.

2 Q Okay. Where did you go to high school?

3 A Robert Morgan.

4 Q Which city is that in?

5 A I guess Miami.

6 Q Okay. When did you graduate?

7 A '98.

8 Q How old are you now?

9 A 35.

10 Q When is your birthday?

11 A [REDACTED].

12 Q Do you remember a woman by the name of Virginia
13 Roberts?

14 A Yes.

15 Q And do you see her here in the room today?

16 A Yes.

17 Q When was the last time that you saw her?

18 A Sixteen years ago.

19 Q How did you meet Ms. Roberts?

20 A She was a friend of my sister's, and that's how
21 I met her.

22 Q What is your sister's name?

23 A [REDACTED] (phonetic). Last name is spelled
24 [REDACTED] but I still can't spell it. My step-sister.

25 But after so long, she's basically my sister.

1 Q Okay. Where is Ms. [REDACTED] now?

2 A I believe Broward County.

3 Q How is it that she came to introduce you to
4 Ms. Roberts?.

5 A She brought her to the house.

6 Q And do you know how they were friends?

7 A They met each other in rehab.

8 Q What kind of rehab?

9 A I'm not sure. I was living in Miami at the
10 time, and I only came up once in a while to visit her. At
11 the very end, when I moved back to Broward with my dad,
12 that's when [REDACTED] home.

13 Q Do you know the name of the rehab program?

14 A No.

15 Q And you do you know what the rehab program was
16 for, drugs, alcohol?

17 A I don't know. I guess, everything probably.

18 Q Do you recall approximately what year you met
19 Ms. Roberts?

20 A I believe around '98.

21 Q How old were you at that time?

22 A 18.

23 Q Do you know how old Ms. Roberts was?

24 A 15 or 16, I believe.

25 Q Was she approximately your sister's age?

1 working at the Taco Bell in Sunrise. Did I get that
2 right?

3 A Yeah, yeah.

4 Q Okay. Did Ms. Roberts come to work at the Taco
5 Bell where you worked?

6 A Not at that one in Sunrise. When we moved to
7 Broward, she worked with me. I think it was another one
8 in Sunrise.

9 Q Okay. So you're saying sometime later you and
10 Ms. Roberts moved to Broward. Is that right?

11 A Yes, we lived in an apartment.

12 Q Where was that apartment?

13 A Oakland Park, I believe.

14 Q And when you moved to that apartment in Oakland
15 Park, that's when she came to work with you at Taco Bell?

16 A Yes.

17 Q Do you know about how old you were when that
18 happened?

19 A It had to be around -- it wasn't long after
20 meeting her.

21 Q Why don't you take a step back and tell me what
22 you recall about meeting Ms. Roberts.

23 A It was a long time ago.

24 Q I understand.

25 A All I remember is my sister bringing her over

1 one day, we got to talking, we liked each other, and we
2 just got to know each other.

3 Q Was she in school at the time?

4 A No.

5 Q Why not?

6 A I'm not entirely sure.

7 Q Was she done with this rehab program?

8 A Yes, at the time.

9 Q Did she go back into it later?

10 A Not that I know of.

11 Q So your understanding is, she was not in school
12 and not in the rehab program at the time that you met
13 Ms. Roberts. Correct?

14 A Not that I know of, no.

15 Q Where was she living when you met Ms. Roberts?

16 A She was staying with us -- or she came over, and
17 then I guess she was staying with us for a little while, I
18 believe.

19 Q And who do you mean by "us"?

20 A At my dad's house.

21 Q Who else was living there besides yourself, your
22 dad and your sister?

23 A My step-mom, my other step-sister, my
24 step-brother and their grandmother. It was a big house.

25 Q How long do you recall Ms. Roberts living at

1 that house with the family?

2 A No idea. Not long.

3 Q Weeks, months, years?

4 A Weeks.

5 Q Okay. You said that you spent some time getting
6 to know Ms. Roberts when you first talked to her?

7 A Uh-hmm.

8 Q Did she tell you anything about her childhood?

9 A If she did, I don't remember, it was so long
10 ago.

11 Q Do you recall meeting her parents?

12 A Yes.

13 Q Was that some time later?

14 A Yes.

15 Q Tell me about when you remember meeting her
16 parents.

17 A I think that was -- all I remember -- really,
18 all I remember is going to the house and meeting her
19 parents. I don't remember much from that time.

20 Q Okay. I appreciate that this is all a long time
21 ago

22 A Yeah.

23 Q Did you and Ms. Roberts become a couple soon
24 after you met her?

25 A Yes.

1 Q Was she dating anyone else at that time?

2 A No.

3 Q Tell me where you -- did you both move out of
4 that home, your dad's home, together?

5 A Yes.

6 Q And where did you go directly after that home?

7 A To the Oakland Park apartment.

8 Q At the time you got the Oakland Park apartment,
9 do you recall how old you were?

10 A I had to be 18 to get an apartment.

11 Q Okay. And do you know how old Ms. Roberts was?

12 A 16.

13 Q Is that a guess, or do you remember?

14 A That's a guess.

15 Q Do you think you are about two years older than
16 she is?

17 A About. Maybe a little more.

18 Q Okay. How long did you two live together at the
19 Oakland Park apartment?

20 A Less -- I know it wasn't a full year. I don't
21 know exactly how long it was. I don't know how many
22 months it was.

23 Q Did anyone else live there with you?

24 A Yes, a roommate.

25 Q Who was that?

1 A Mario. Last name, I can't remember. I haven't
2 seen him since that apartment.

3 Q Was he a friend of yours or hers, or just
4 someone else?

5 A He was a friend of mine. He worked with me at
6 Taco Bell.

7 Q And after you moved to this Oakland Park
8 apartment, Ms. Roberts came to work at the Taco Bell as
9 well?

10 A Yeah, with him and me.

11 Q Do you recall where that Taco Bell was?

12 A By the Sawgrass Mall.

13 Q How long did Ms. Roberts work at that Taco Bell?

14 A I don't remember.

15 Q You were a manager at the time?

16 A Yes, me and my roommate.

17 Q You were both managers?

18 A Yeah.

19 Q Was she an official employee?

20 A Yes.

21 Q She was on the payroll?

22 A Yes.

23 Q And you were the manager?

24 A Um-hmm?

25 Q And she paid -- she was paid for by Taco Bell?

1 A Yes.

2 Q Was it is a franchise, if you know?

3 A I know when I first started there, they were
4 corporate, but then they were a franchise. They were
5 bought out. But I'm not sure if when I got there they
6 were a franchise or not.

7 Q Got it.

8 Do you know if Ms. Roberts had any previous
9 employment before she worked at Taco Bell?

10 A I think by the apartment, she worked for KFC for
11 a little while.

12 MS. MENNINGER: Are you looking at Ms.
13 Roberts?

14 THE WITNESS: I'm thinking. I can't
15 remember. I remember something with KFC. They
16 had one really close to us. I think she worked
17 there for a tiny, tiny bit. I'm not sure.

18 MS. MENNINGER: Okay.

19 BY MS. MENNINGER:

20 Q Before the Taco Bell?

21 A Or she could've applied there. It's just in my
22 head. She might have just applied there, and didn't get
23 it, and that's why I brought her to Taco Bell.

24 Q Okay.

25 A Because we were both the night managers.

1 Q Okay. Got it.

2 So for not a full year, the two of you worked
3 together at a Taco bell near the Sawgrass Mills (as
4 heard) and lived in an apartment in Oakland Park?

5 A Yes.

6 MR. EDWARDS: Object to the form.

7 BY MS. MENNINGER:

8 Q With Mario?

9 A Yeah.

10 Q Did Mario live there the whole time?

11 A Yes.

12 Q What caused you to stop living at the Oakland
13 Park apartment?

14 A I don't remember exactly. But I know we moved
15 out before, and Mario stayed in the apartment.

16 Q Where did you move to?

17 A Her parent's house.

18 Q Did you move into the house or to someplace near
19 the house?

20 A I don't remember if we originally moved into the
21 house. But I know they had a trailer in the back that we
22 lived in.

23 Q How long did you live in the trailer in the
24 back?

25 A No idea.

1 A No.

2 Q Do you know about what years this was?

3 A Not really.

4 Q Do you know about how old you were?

5 A When, what?

6 Q I'm just focused on the period of time in which
7 you were living at her parent's house in the trailer.

8 A I was probably 18 when we moved in there.

9 Q And you said you were only there for a couple of
10 months?

11 A Not that I remember. Like, it might have been a
12 little longer. I'm not sure.

13 Q Were you engaged to Ms. Roberts?

14 A Yes.

15 Q When did you become engaged to her?

16 A When we were living in Oakland Park.

17 Q Tell me about the engagement. How did it come
18 about?

19 A Well, we fell in love, and -- I believe it was
20 Valentine's Day when I proposed.

21 Q Did you have a ring?

22 A Yes.

23 Q Did she accept?

24 A Yes.

25 Q How long were you engaged?

1 A I'm not entirely sure.

2 Q Do you remember an event where the engagement
3 was broken off?

4 A When I left.

5 Q Left where?

6 A When I left -- Royal Palm Beach, I guess, was
7 our apartment.

8 Q When you left that apartment, that's when the
9 engagement was over in your mind?

10 A Yes.

11 Q Were your families happy about the engagement?

12 A Yes. My mother was. My dad wasn't too happy.

13 Q Have you ever been married since then?

14 A No.

15 Q Have you ever been engaged since then?

16 A No.

17 Q Do you know what happened to the ring?

18 A Yes.

19 Q Where is it?

20 A I have it.

21 Q Still?

22 A Yeah. It was my grandmother's.

23 Q Did you get down on one knee?

24 A Yes, at the beach, I believe.

25 Q When you were living in Oakland Park, in this

1 Q So from about the ages you were 18 to 20 is when
2 you were living together with Virginia?

3 A Yeah.

4 Q And between the time you met her at your dad's
5 house and the time that you broke up, did you guys break
6 up and get back together, or was it one consistent
7 relationship, and then it had an end date?

8 A Yeah, one consistent relationship.

9 Q Okay. You mentioned that you moved into an
10 apartment in Royal Palm Beach?

11 A Yeah, I believe that's where it was, Royal Palm
12 Beach.

13 Q Do you remember anything about the apartment?

14 A All I remember, it was on the third floor.

15 Q And who got that apartment?

16 A I did.

17 Q Again, you were over 18 at that time?

18 A Yes.

19 Q So you got the lease?

20 A Yes.

21 Q Do you remember looking for the apartment?

22 A I believe so.

23 Q And it wasn't the first apartment you rented,
24 right?

25 A No. No, the one in Oakland Park was the first

1 one I rented.

2 Q Okay.

3 MS. MENNINGER: I'm going to show you some
4 photographs. If I could have you mark this. I
5 guess we'll start again with, I guess we'll start
6 again with Defendant's Exhibit -- I got one for
7 you. Defendant's Exhibit 1 or A, whatever you put
8 on it.

9 THE COURT REPORTER: 1.

10 MS. MENNINGER: Exhibit 1.

11 (Defendant's Exhibit 1, photograph, was
12 marked for identification.)

13 BY MS. MENNINGER:

14 Q Please take a look at this. There are two
15 photographs stapled together.

16 Does that look like the apartment that you
17 lived in on the third floor?

18 A It could be. I don't really remember it.

19 Q The address on this is 368 Bent Oak. Does that
20 sound about right?

21 A Bent Oak sounds familiar.

22 Q You don't recognize the -- it may have been
23 painted, for example?

24 A Yeah. I mean, all I remember is being on the
25 third floor.

1 MS. MENNINGER: I'm going to show you another
2 exhibit. Let me find it. We'll mark this
3 Defendant's Exhibit 2.

4 (Defendant's Exhibit 2, passport, was marked
5 for identification.)

6 BY MS. MENNINGER:

7 Q I know this is not terribly easy to read, but
8 it's a passport application that has been previously
9 identified in this case. And in the middle section,
10 there's emergency contact information that says "James
11 Austrich".

12 Do you see that?

13 A Yes.

14 Q Is that you?

15 A Yes.

16 Q And it says 368 Bent Oak Drive below that?

17 A Yes.

18 Q Does that refresh your memory as to the address,
19 the apartment that you lived in in Royal Palm Beach?

20 A Like I said, Bent Oak sounds very familiar, and
21 I know it was Royal Palm Beach. So possibly it was that
22 one.

23 Q Okay. And how long do you think that you lived
24 in this apartment?

25 A I'm not entirely sure. Less than a year, that's

1 MS. MENNINGER: I'm going to mark this
2 exhibit as Defendant's Exhibit 3.

3 (Defendant's Exhibit 3, Citation Tracking
4 Report, was marked for identification.)

5 BY MS. MENNINGER:

6 Q I'm going to have you take a look at this.
7 Actually, I apologize because I need you to turn back
8 several pages to -- the lower right-hand corner has some
9 page numbers that say G.M. And I need you to go to 781.

10 A (Witness complies.)

11 Q Could I have you take a look at the narrative
12 section of that page. If you want to just read that
13 paragraph.

14 A "John Perkins," I don't even know that name.

15 MS. MENNINGER: I guess you guys haven't kept
16 in touch.

17 MR. EDWARDS: He was scared that day.

18 THE WITNESS: (cont'd) Plus, when I left
19 there, I didn't really talk to anybody from up
20 there. I remember somewhat of that. Yeah, I
21 remember the cops telling me even though it was
22 under my name, I couldn't go in. And I think
23 later on then they got out so I could go back and
24 get me stuff. I think I was going to see my
25 animals.

1 BY MS. MENNINER:

2 Q Yeah. I didn't know if reading this might cause
3 you to remember some things.

4 A I somewhat remember that. I remember the cops
5 coming and telling me I wasn't allowed to go in my own
6 apartment that was under my name.

7 Q Okay. So this is dated June 10th, of 2001. And
8 it places you at 368 Bent Oak Drive, correct?

9 A Yes.

10 Q Okay. Do you understand that to likely be where
11 you were living with Ms. Roberts?

12 A Yeah. But at the time I was already back in
13 Broward.

14 Q Okay. Do you know how long you had been back in
15 Broward?

16 A Not a clue.

17 Q And in this, it refers to Ms. Roberts as your
18 ex-fiancé, correct?

19 A Yes.

20 Q So presumably the event you described where you
21 had a fight and left had already occurred?

22 A Yes.

23 MR. EDWARDS: Form.

24 THE WITNESS: I know I was already out of
25 there. And that's why when I went back, that's

1 when the cops said I couldn't go in my own
2 apartment.

3 BY MS. MENNINGER:

4 Q So your recollection today is that you were
5 returning to that apartment to either get things or check
6 on pets?

7 A Yes.

8 Q What pets do you recall having?

9 A A dog and six cats and, I believe, ferrets and
10 rabbits. One reason we got along so well is because we
11 liked animals.

12 Q And do you remember going back to the apartment
13 to check on the pets and encountering Ms. Roberts and
14 Tony?

15 A Yeah.

16 Q Were you inside the apartment when you
17 encountered them?

18 A No, outside.

19 Q Did you understand them to be living in the
20 apartment at that time?

21 A Yes.

22 Q In the police report it says "Austrich stated
23 his ex-fiance, Virginia Roberts, who also resides at the
24 above-listed address, brought her friend to the
25 apartment."

1 A I believe that was Tony.

2 Q Okay. And at this time, the police are
3 indicating that you both lived there. But that's not what
4 you remember?

5 A No. They wouldn't even let me -- all I
6 remember -- I remember being outside the door and the cops
7 wouldn't let me go in there because -- even though it was
8 my apartment and my address was on the thing, I wasn't
9 allowed in there. Because I'm pretty sure I wasn't living
10 there. I just came back to get something.

11 Q Do you know how long after you left you were
12 coming back to get something?

13 A I don't remember.

14 Q If you left your pets there, I guess, I'm just
15 wondering whether you intended to go back and get your
16 pets?

17 A I couldn't because my dad didn't -- my dad
18 didn't really take -- like, he didn't want all those
19 animals. Because he already had three dogs and he wasn't
20 a fan of cats.

21 MR. EDWARDS: Or ferrets.

22 A (cont'd) Or ferrets or rabbits. I think we had
23 a gerbil, mice, rats, all kinds of stuff. I know we had
24 pet store cages that we bought to keep them all in.
25 Because when we lived in West Palm Beach it was like a

1 little animal rescue for a while.

2 Q Did you get that stuff from the pet store where
3 you both had worked?

4 A Yes.

5 Q A discount, I hope?

6 A I feel like every time I went to the pet store,
7 I got a new animal. Still do the same thing.

8 Q Do you have pets today?

9 A Oh, yeah. I have dogs. I have two dogs. We
10 have six cats and three birds.

11 Q No reptiles?

12 A No. No, I don't really like ---

13 Q Is that a different kind of pet owner?

14 A Well, I had reptiles in West Palm Beach. They
15 are too hard to take care of.

16 Q Spiders?

17 A No, I don't want to be -- I have enough spiders
18 where I live. I don't need pet spiders.

19 Q Okay. All right.

20 Do you remember Tony punching you in the
21 face?

22 A I don't remember.

23 Q You see that's what the police report says?

24 A Yeah, yeah, yeah. He might have. I don't
25 remember.

1 Q And the police observed you to have minor
2 swelling and a large red mark. Does that sound accurate?

3 A From according to what it says, yeah. I don't
4 really remember that. I remember being at the door and
5 the cops coming and telling me I can't go in there. Once
6 I read that, that's really all I remember.

7 Q Do you believe that whatever altercation you had
8 took place within the apartment or outside the apartment?

9 A In the doorway at the most. I never went inside
10 that apartment when that was happening, not I remember.

11 Q Do you ever get to see those pets again?

12 A Yes. I think later on, they both left for the
13 day and let me go in and see my pets.

14 Q Now, this indicates that the police were there
15 at about 9:20 in the evening, and you were there with
16 Mr. Perkins. But you don't remember Mr. Perkins?

17 A No. If it would have said "Josh" I think that
18 might be a name I remember. But John -- I know we had two
19 friends up there. John could have been one of them, but I
20 don't really remember. John Perkins. That's so weird.

21 Q The police report also indicates that
22 Mr. Figueroa observed Perkins on the telephone and fled
23 the scene prior to arrival. Do you remember that?

24 A No. I don't remember "Perkins". As soon as I
25 saw that name, I'm like "Who the hell is John Perkins?"

1 Q All right. If you can turn to the next page.
2 The police report continues that they made numerous
3 attempts to contact you and Mr. Perkins, whoever he is --

4 A Yeah.

5 Q -- and Ms. Roberts at the residence or on the
6 phone, but had not been able to do that?

7 A If they called the residence, I wasn't living
8 there. And I don't remember them ever trying to call me
9 in Broward.

10 Q Do you know if you had a cell phone? This was
11 back in '01. I don't even know if I had a cellphone in
12 '01?

13 A Yeah, I really couldn't tell ya'.

14 Q Okay. So your best recollection, after
15 reviewing this report, is that you had left on a previous
16 date and came back on this date to see your pets?

17 A Yeah, yeah.

18 Q And that you were ultimately able to get in and
19 see the pets?

20 A Later on, yes.

21 Q Okay. Like, the same day or --

22 A Later on. I don't really remember how much
23 longer --- how many days later, or something. Not too
24 long.

25 Q And when you came back at that later time, you

1 did not encounter Ms. Roberts?

2 A No, nobody was in the house but my animals.

3 Q And since that time you have not had any contact
4 with Ms. Roberts?

5 A No.

6 Q Okay. What was your opinion of Tony?

7 MR. EDWARDS: Form.

8 THE WITNESS: An idiot. That's all I really
9 remember.

10 BY MS. MENNINGER:

11 Q Did you believe him to be using drugs?

12 A Yes.

13 Q Do you know what kind?

14 A Whatever he could get.

15 Q When Ms. Roberts started hanging out with Tony
16 again, did you then believe her to be using drugs?

17 A Yes.

18 MR. EDWARDS: Form.

19 BY MS. MENNINGER:

20 Q What caused you to have that belief?

21 A Actions.

22 MR. EDWARDS: Same objection.

23 BY MS. MENNINGER:

24 Q What kinds of actions?

25 A I don't remember. All I remember is that's what

1 A Sorry.

2 Q You're still under oath, do you remember?

3 A Yes.

4 Q Okay. So you were referring a little bit to the
5 time that Ms. Roberts worked for Jeff?

6 A Yes.

7 Q You knew him as Jeff or Jeffrey?

8 A I remember Jeff. It could have been Jeffrey.

9 Q Okay. Tell me what you recall about Ms. Roberts
10 going to work for Jeff.

11 A I don't remember much of it, really. All I
12 remember is that she went to work for him. I know they
13 went to some island. I know they traveled around. And he
14 had a house in Palm Beach I think it was.

15 Q Did she tell you what she was doing for Jeff?

16 A At the beginning, it was massage. That's what I
17 was told.

18 Q By her?

19 A Yes.

20 Q Okay. Did she seem excited about that job?

21 A Yes.

22 Q Was she getting paid more money?

23 A Yes.

24 Q Do you know how much?

25 A No. A lot more.

1 Q So she hadn't come to you before that and said,
2 "Hey, I'm having to do something other than massages"?

3 A I don't remember.

4 Q She may have; she may not have?

5 A Yeah. I don't remember.

6 Q Well, why would you be fighting about it at the
7 end?

8 A Well, that's because she was messing with Tony,
9 the idiot.

10 Q So the fight --

11 A I mean, that's what he -- the fight's what
12 brought everything out.

13 Q Okay. So she was messing with Tony, the idiot,
14 and you guys got in a fight about her messing with Tony?

15 A I think that's what it originally it was.
16 Because she was supposed to come home, and I think she
17 went over there instead. That's when I found out --
18 that's when I found out about that, with the idiot. Then,
19 I believe the other stuff came to light. I don't really
20 remember.

21 Q As you sit here, you think that's when you were
22 finding out about all of this at the same time?

23 A I believe so, but I don't really remember.

24 Q Do you know where Tony lived?

25 A Somewhere around there, where our other

1 Q You had trouble figuring out what was the truth?

2 A Yeah. But I know for sure she was with the
3 idiot, so that's the main reason.

4 Q Well, you saw her with him, right?

5 A Well, I found out that she was in town, but not
6 here, and that's when I found out.

7 Q Okay. Not at home -- not at your home?

8 A Yeah.

9 Q When you believed yourself to be engaged?

10 A Yes.

11 Q Okay. She was not truthful with you about her
12 whereabouts?

13 MR. EDWARDS: Object to the form.

14 THE WITNESS: Yes.

15 BY MS. MENNINGER:

16 Q And you confirmed that in some fashion?

17 A Yes.

18 Q When another problem arose at the apartment, the
19 police were called, correct?

20 MR. EDWARDS: Form.

21 THE WITNESS: Other than that?

22 BY MS. MENNINGER:

23 Q With Mr. Perkins?

24 A I don't -- all I remember is that one time.

25 Q I just did a really bad question, so let me try

1 about being forced to do things --

2 A No. She might have told me some stuff, but
3 what, I don't remember really. Who knows if it was the
4 truth at the time anyway.

5 Q And you weren't doing drugs at that time?

6 A I wouldn't say no. I know at the end, I was
7 smoking a lot. And I might have been doing some other
8 stuff. I'm not sure.

9 Q Okay. Regardless, you would not have been
10 comfortable believing your fiancé was having sex with
11 other people?

12 A No.

13 Q Did she, Ms. Roberts ever tell you that she was
14 posing naked for photographs?

15 A No.

16 Q Would you have been okay with her posing naked
17 for photographs?

18 A No.

19 Q Did Ms. Roberts ever mention Ghislaine Maxwell,
20 my client?

21 A If she did, I don't remember the name. Like I
22 said, I only remember Jeff. That name is all I really
23 remember.

24 Q Because you don't remember Ms. Maxwell's name, I
25 assume you don't remember Ms. Roberts telling you that

C E R T I F I C A T E

STATE OF FLORIDA

COUNTY OF MARION

I, Karla Layfield, RMR, Stenographic Court Reporter, do hereby certify that I was authorized to and did stenographically report the foregoing deposition of James Michael Austrich; that said witness was duly sworn to testify truthfully; and that the foregoing pages, numbered 1 through 145, inclusive, constitute a true and correct record of the testimony given by said witness to the best of my ability.

I FURTHER CERTIFY that I am not a relative or employee or attorney or counsel of any of the parties hereto, nor a relative or employee of such attorney or counsel, nor am I financially interested in the action.

WITNESS MY HAND this ___ day of June, 2016, at Ocala, Marion County, Florida.

Karla Layfield, RMR
Stenographic Court Reporter

1 CERTIFICATE OF OATH

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, the undersigned authority, certify that James
5 Michael Austrich personally appeared before me and was
6 duly sworn on the 23rd day of June, 2016.

7 WITNESS MY HAND AND OFFICIAL SEAL this _____ day
8 of June, 2016.

9
10
11 _____
Karla Layfield, RMR
Notary Public
State of Florida at Large
My Commission No. FF942806
12 My Commission Expires 12/10/2019
13
14

15 _____ Personally Known
16 _____ Professionally Known
17 X Produced Identification of FDL
Exp. 07/9/80
18
19
20
21
22
23
24
25

EXHIBIT M

UNITED STATES DEPARTMENT OF STATE
APPLICATION FOR ☐ PASSPORT ☐ REGISTRATION
(Type or print all capital letters in blue or black ink in white areas only)

1. NAME (First and Middle)
NIRGINIA Lee

LAST
ROBERTS

2. MAIL PASSPORT TO: STREET / RD # OR P.O. BOX
[REDACTED] APT. #
[REDACTED] STATE
[REDACTED] ZIP CODE
33470 COUNTRY / IN CARE OF (if applicable)
USA

5. DATE OF BIRTH
JAN 12 2001

6. SOCIAL SECURITY NUMBER
[REDACTED] Personal Information

3. SEX
☐ M ☒ F

4. PLACE OF BIRTH (City & State or City & Country)
SACRAMENTO California

7. HEIGHT
5' 10"

8. HAIR COLOR
Blonde

9. EYE COLOR
Blue Green

11. BUSINESS OCCUPATION
[REDACTED]

12. PERMANENT ADDRESS (DO NOT LIST P.O. BOX)
[REDACTED] CITY
Lexington STATE
FL ZIP CODE
33470

14. FATHER'S FULL NAME
Last First Middle Initial
ROBERTS SKY California

15. MOTHER'S FULL MAIDEN NAME (BIRTHPLACE)
Last First Middle Initial
Lyon Virginia

16. HAVE YOU EVER BEEN MARRIED?
☐ Yes ☒ No

17. OTHER NAMES YOU HAVE USED
[REDACTED]

18. HAVE YOU EVER BEEN ISSUED A U.S. PASSPORT?
☐ Yes ☒ No

19. EMERGENCY CONTACT (If you wish, you may supply the name, address and telephone number of a person not traveling with you to be contacted in case of emergency.)
NAME
James Anselmi
[REDACTED]
TELEPHONE
[REDACTED] RELATIONSHIP
Father

20. TRAVEL PLANS (not mandatory)
Exp. Date
01/11/2011
Length of Trip
01/21/01
COUNTRIES TO BE VISITED
London
Khartoum

21. STOP - DO NOT SIGN APPLICATION UNTIL REQUESTED TO DO SO BY PERSON ADMINISTERING OATH.
I have not, since acquiring United States citizenship, performed any of the acts listed under "Acts or Conditions" on the reverse of this application form. I solemnly swear or affirm that the statements made on this application are true and the photograph attached is a true likeness of me.

22. FOR ACCEPTANCE AGENT'S USE
Subscribed and sworn to (affirmed) before me
FOIA: (b)(6)
[Signature of person authorized to accept application]
23. APPLICANT'S IDENTIFYING DOCUMENTS
☒ DRIVER'S LICENSE
☐ PASSPORT
☐ OTHER (Specify)
ISSUE DATE
05/21/00 EXPIRATION DATE
05/21/05
24. FOR ISSUING OFFICE USE ONLY (Applicant's evidence of citizenship)
☐ Birth Certificate
☐ Passport
☐ Report of Birth
☐ Naturalization/Citizenship Cert.
☐ Other
☐ Sent & Returned
☐ Attached
25. Fee
45 EXEC 25 ET 35 OTHER

EXHIBIT N

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE

May 3, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

FAMER, JAFFE, WEISSING, EDWARDS, FISTOS &
LEHRMAN, P.L.

By Brad Edwards, Esq.
425 N. Andrews Avenue
Suite 2
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Phone: 954.524.2820
brad@pathtojustice.com
Appearing on behalf of the
Plaintiff

BOIES, SCHILLER & FLEXNER LLP

By Sigrid S. McCawley, Esq. (For Portion)
401 East Las Olas Boulevard
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Fort Lauderdale, FL 33301-2211
Phone: 954.356.0011
smccawley@bsfllp.com
Appearing on behalf of the
Plaintiff

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.

By Laura A. Menninger, Esq.

3 Jeffrey S. Pagliuca, Esq.

150 East 10th Avenue

4 Denver, CO 80203

Phone: 303.831.7364

5 lmenninger@hmflaw.com

jpagliuca@hmflaw.com

6 Appearing on behalf of the

7 Defendant

Also Present:

8 Brenda Rodriguez, Paralegal

9 Nicholas F. Borgia, CLVS Videographer

Pursuant to Notice and the Federal Rules of Civil Procedure, the VIDEOTAPED DEPOSITION OF VIRGINIA GIUFFRE, called by Defendant, was taken on Tuesday, May 3, 2016, commencing at 9:00 a.m., at 150 East 10th Avenue, Denver, Colorado, before Kelly A. Mackereth, Certified Shorthand Reporter, Registered Professional Reporter, Certified Realtime Reporter and Notary Public within Colorado.

* * * * *
I N D E X

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PRODUCTION REQUEST(S):	
(None.)	

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1 January 19th, 2015?

2 A At the very top of the page it says
3 January 21st, 2015.

4 Q The date it was filed. Is there a date
5 just above the signature block?

6 A Oh, yes, sorry. Yes, there is.

7 Q And what date -- what date was that?

8 A The 19th day of January, 2015.

9 Q Okay. And this document is something that
10 you believe contains the truth, correct?

11 A To the best of my knowledge at the time,
12 yes.

13 Q All right. Did something change between
14 the time then and today that makes you believe that
15 it's not all accurate?

16 A Well, as you can see, in line 4 on page 1,
17 I wasn't aware of my dates. I was just doing the
18 best to guesstimate when I actually met them.

19 Since then I've been able to find out that
20 through my Mar-a-Lago records that it was actually
21 the summer of 2000, not the summer of 1999.

22 Q Oh, I'm sorry. Are you back on page 1?

23 A On the first page.

24 Q Okay.

25 A Yes.

1 Q And you're talking about line 4?

2 A Line 4.

3 Q Paragraph 4 or line 4?

4 A Oh, sorry. Number 4, the paragraph
5 number 4.

6 Q Okay. And what part of paragraph 4 do you
7 now believe to be untrue?

8 A In approximately --

9 MR. EDWARDS: Object to the form.

10 You can answer.

11 A In approximately 1999 when I was 15 years
12 old I met Ghislaine Maxwell.

13 Q (BY MS. MENNINGER) Okay.

14 A I now know that it was 2000, that I was 16
15 years old when I met Ghislaine Maxwell.

16 Q So when you signed this document under
17 penalty of perjury stating that it was true, you no
18 longer believe that to be true, correct?

19 A It was an honest mistake. We had no idea
20 how to pinpoint without any kind of records or dates
21 or anything like that. I was just going back
22 chronologically through time. And that's the best
23 time that I thought it was. And now I know the
24 facts, so it's good to know.

25 Q So you now believe that a document you

1 filed under oath is no longer true, correct?

2 MR. EDWARDS: Object to the form.

3 A I wouldn't say that it wasn't true. I was
4 just unaware of the times and the dates.

5 Q (BY MS. MENNINGER) Again, is there more
6 than one truth, Ms. Roberts?

7 A No, there's no more than one truth.

8 Q All right. So a document in which you
9 swore that you were 15 years old when you met
10 Ms. Ghislaine Maxwell is an untrue statement,
11 correct?

12 MR. EDWARDS: Object to the form.

13 A It's not that it's an untrue statement.
14 It was a mistake. So it wasn't intentionally trying
15 to say something that wasn't true. It was to my best
16 knowledge that I thought it was 1999. And when I got
17 my records from Mar-a-Lago I was able to find out
18 that it was 2000. And this was entered before I
19 found out the actual dates that I did work at
20 Mar-a-Lago.

21 Q (BY MS. MENNINGER) Okay. So a document
22 that you filed under oath --

23 A Um-hum.

24 Q -- is now, you believe to be untrue,
25 correct?

1 MR. EDWARDS: Objection. Asked and
2 answered.

3 Q (BY MS. MENNINGER) You may answer.

4 MR. EDWARDS: Answer again.

5 A Again, I wouldn't say it's untrue. Untrue
6 would mean that I would have lied. And I didn't lie.
7 This was my best knowledge at the time. And I did my
8 very best to try to pinpoint time periods going back
9 such a long time ago.

10 It wasn't until I found the facts that I
11 worked at Mar-a-Lago in 2000 that I was able to
12 figure that out.

13 Q (BY MS. MENNINGER) And approximately when
14 did you learn those facts about the dates you worked
15 at Mar-a-Lago?

16 A I would say it was mid-2015.

17 Q Mid-2015 is the first time you became
18 aware of the dates --

19 A I don't know the exact --

20 Q If you could just let me finish.

21 A I'm sorry.

22 Q That's all right. Approximately mid-2015
23 when you learned the true dates that you had worked
24 at Mar-a-Lago?

25 A That's correct. Sorry.

1 a lot of the circumstances that I had been subjected
2 to, I decided I wanted to get my GED.

3 Q Okay. So you were going to an actual
4 school to get your GED, that's what you're saying?

5 A Yes.

6 Q And that school, whatever it was, where
7 you were getting your GED was not Palm Beach High
8 School, right?

9 A No.

10 Q And it -- whatever the school was where
11 you were getting your GED took a summer break?

12 A I believe so, yes.

13 Q And that was in 2000?

14 A Now that we know the right dates, yes.

15 Q And that's when your dad helped you get a
16 quote-unquote summer job?

17 A Yes.

18 Q All right. And that summer job was
19 Mar-a-Lago?

20 A Yes.

21 Q Okay. Now tell me how you sort of came
22 into Mar-a-Lago for the first time? He asked you to
23 come? They called you? What happened?

24 A My dad was very liked there. So I think
25 he talked to the people who were in HR. And then

1 mic higher up on your jacket, please?

2 THE DEPONENT: Sure.

3 THE VIDEOGRAPHER: Thank you.

4 THE DEPONENT: Tell me if that's okay.

5 Better?

6 A Okay. Page 40?

7 Q (BY MS. MENNINGER) Right. Do you see the
8 first full paragraph on that page?

9 A I do.

10 Q The first line begins: I spent my sweet
11 16th birthday on his island in the Caribbean next to
12 Little (sic) St. James Isle. He liked to call it
13 Little St. Jeff's. His ego was enormous as his
14 appetite for fornicating.

15 Do you see that sentence?

16 A I do.

17 Q That is not true, correct? You were not
18 spending your sweet 16th birthday on Little St. James
19 Isle, correct?

20 A Based on my knowledge at the time that I
21 wrote this manuscript, I thought I did spend my 16th
22 birthday there. And so I put it down in there as
23 that. Now I know that it wasn't my 16th birthday.

24 Q Or your sweet 16th birthday?

25 A Well, we --

1 MR. EDWARDS: Object to the form.

2 Harassing.

3 Q (BY MS. MENNINGER) Was it your sweet 16th
4 birthday?

5 A Is it not custom to call your 16th
6 birthday sweet? Have you never heard that saying
7 before?

8 Q Was it your sweet 16th birthday,
9 Ms. Giuffre?

10 A As we --

11 MR. EDWARDS: She's answered the question.
12 It's been asked and answered.

13 MS. MENNINGER: She asked me a question,
14 actually. You're not testifying here.

15 Q (BY MS. MENNINGER) Was it your sweet 16th
16 birthday?

17 A As I thought, in the manuscript when I
18 wrote it, I thought it was my sweet 16th birthday.

19 Q Okay. Now that you know it wasn't, where
20 did you spend your sweet 16th birthday?

21 A Well, I don't know.

22 Q Well, just give us your best guess.

23 MR. EDWARDS: Objection. And she's not
24 going to guess today. She's going to tell you the
25 answers as she remembers them.

1 A Again, I don't know.

2 Q Do you recall any present you actually got
3 on your sweet 16th birthday?

4 A No, I don't. I don't know where I spent
5 it, who I spent it with or what I got. I'm sorry.

6 Q How long did you work at Mar-a-Lago?

7 A Best of my recollection, it was a summer
8 job. I believe I started in June. And I think I
9 only worked there approximately two weeks, two, three
10 weeks.

11 Q How many hours a week did you work?

12 A I want to say it was a -- I want to say
13 it's a full-time job.

14 Q Do you recall it being a full-time job?

15 A It was a summer job, but just thinking
16 back, my dad used to bring me in and bring me home.
17 So he worked full time, all day. So -- and I didn't
18 lounge around Mar-a-Lago so, yes, I think it would
19 have been a full-time job.

20 Q And how much did you make per hour?

21 A Approximately, I think I remember making
22 \$9 an hour.

23 Q The bracelet and earrings you got for your
24 birthday, some birthday, on Little -- or where was
25 that birthday party, at Little St. James?

1 Q Which brother?

2 A Sky.

3 Q What about your other brother?

4 A I think he had moved out by then.

5 Q What forms of communication did you have?

6 Just a home phone number, or what?

7 A Yeah, there was a home phone.

8 Q When do you recall ever getting a cell
9 phone?

10 A The first cell phone I ever got was the
11 one that Ghislaine gave to me.

12 Q So you never had -- your parents, did they
13 have ones when you were working at Mar-a-Lago?

14 A No, my dad used to -- like, we had phones
15 in the spa and maintenance area and so on, so forth.
16 And you could, so to speak, page people from around
17 the courts.

18 Q Okay. So tell me what you recall of the
19 first conversation that you had with Ghislaine
20 Maxwell.

21 A I'm sitting there reading my book about
22 massage therapy, as I'm working in the spa. And I'm
23 getting my GE -- well, I was in the process of
24 getting my GED before I went to my summer job. I
25 decided that I would like to become a massage

1 A Yes.

2 Q Who else was at home when you got home?

3 A My mom, my dad and my brother.

4 Q Which brother?

5 A Sky.

6 Q And anyone else who was there at the time?

7 A I believe Michael might have been living
8 with me at that time. So he might have been there.

9 Q Do you recall if he was there when you got
10 home?

11 A I don't really remember. I remember what
12 I did when I got home, that I basically made a
13 beeline for the bathroom.

14 Q Let me ask you a question. Michael was
15 living with you at that home, at your parents' home
16 at the time, is your best recollection today; is that
17 right?

18 A That's my best recollection, yes.

19 Q When you say living with you, were you
20 guys staying in the same room?

21 A Yes.

22 Q Were you engaged at that time to him?

23 A That was a really weird relationship. He
24 was a friend who looked after me, and he did propose
25 to me and I did say yes. But my heart was never in

1 it.

2 He was somebody that helped me off the
3 streets so I felt compelled to say yes to him.

4 Q Okay. So when he proposed to you and you
5 said yes, did that take place before you started
6 working at Mar-a-Lago or after you started working at
7 Mar-a-Lago?

8 A Before.

9 Q And so if he were living with your parents
10 at that time, you were living in the same room; is
11 that correct?

12 A I believe so.

13 Q And your parents understood him to be your
14 fiance?

15 A I don't think they agreed with it, but I
16 think they understood it as that. I mean --

17 Q I mean, you communicated to them that he
18 had proposed and you had accepted?

19 A Yeah, in not such a pretty way. I mean,
20 they obviously weren't very happy about it. And it
21 wasn't my true intentions to ever marry him.

22 Q Okay.

23 A But I did it to make him feel okay. I
24 didn't want to be mean.

25 Q What did your mom say about your

1 know where it was when she said to go do this.

2 Q (BY MS. MENNINGER) Okay. Where were you
3 sent to have sex with the owner of a large hotel
4 chain by Ghislaine Maxwell?

5 MR. EDWARDS: Object to the form.

6 A I believe that was one time in France.

7 Q (BY MS. MENNINGER) Which time in France?

8 A I believe it was around the same time that
9 Naomi Campbell had a birthday party.

10 Q Where did you have sex with the owner of a
11 large hotel chain in France around the time of Naomi
12 Campbell's birthday party?

13 A In his own cabana townhouse thing. It was
14 part of a hotel, but I wouldn't call it a hotel.

15 Jeffrey was staying there. Ghislaine was
16 staying there. Emmy was staying there. I was
17 staying there. This other guy was staying there. I
18 don't know his name.

19 I was instructed by Ghislaine to go and
20 give him an erotic massage.

21 Q She used the words erotic massage?

22 A No, that's my word. The word massage is
23 what they would use. That's their code word.

24 Q Was she in the room when you gave this
25 erotic massage to the owner of a large hotel chain?

1 A No, she was not in the room. She was in
2 another cabana.

3 Q And other than telling you to go give the
4 owner of this large hotel chain a massage, do you
5 remember any other words she used to you to direct
6 you in what you should do?

7 A Not at the time, no.

8 Q Where did -- where were you and where was
9 Ms. Maxwell when she directed you to go have sex with
10 Marvin Minsky?

11 MR. EDWARDS: Object to the form.

12 A I don't know.

13 Q (BY MS. MENNINGER) Where did you go to
14 have sex with Marvin Minsky?

15 A I believe it was the U.S. Virgin Islands,
16 Jeff's -- sorry, Jeffrey Epstein's island in the U.S.
17 Virgin Islands.

18 Q And when was that?

19 A I don't know.

20 Q Do you have any time of year?

21 A No.

22 Q Do you know how old you were?

23 A No.

24 Q Other than Glenn Dubin, Stephen Kaufmann,
25 Prince Andrew, Jean Luc Brunel, Bill Richardson,

1 another prince, the large hotel chain owner and
2 Marvin Minsky, is there anyone else that Ghislaine
3 Maxwell directed you to go have sex with?

4 A I am definitely sure there is. But can I
5 remember everybody's name? No.

6 Q Okay. Can you remember anything else
7 about them?

8 A Look, I've given you what I know right
9 now. I'm sorry. This is very hard for me and very
10 frustrating to have to go over this. I don't -- I
11 don't recall all of the people. There was a large
12 amount of people that I was sent to.

13 Q Do you have any notes of all these people
14 that you were sent to?

15 A No, I don't.

16 Q Where are your notes?

17 A I burned them.

18 Q When did you burn them?

19 A In a bonfire when I lived at Titusville
20 because I was sick of going through this shit.

21 Q Did you have lawyers who were representing
22 you at the time you built a bonfire and burned these
23 notes?

24 A I've been represented for a long time, but
25 it was not under the instruction of my lawyers to do

1 this. My husband and I were pretty spiritual people
2 and we believed that these memories were worth
3 burning.

4 Q So you burned notes of the men with whom
5 you had sex while you were represented by counsel in
6 litigation, correct?

7 MR. EDWARDS: Object to the form.

8 A This wasn't anything that was a public
9 document. This was my own private journal, and I
10 didn't want it anymore. So we burned it.

11 Q (BY MS. MENNINGER) When did you write
12 that journal?

13 A Just over time. I started writing it
14 probably in, I don't know, I can't speculate, 2012,
15 2011.

16 Q So you did not write this journal at the
17 time it happened?

18 A No.

19 Q You started writing this journal
20 approximately a decade after you claim you finished
21 being sexually trafficked, correct?

22 A Yes.

23 Q And you started writing a journal after
24 you had a lawyer, correct?

25 A Correct.

1 Q Including Mr. Edwards, who is sitting
2 right here, correct?

3 A Correct.

4 Q What did that journal look like?

5 A It was green.

6 Q And what else?

7 A It was just a spiral notebook.

8 Q Okay. And what did you put into that
9 green spiral notebook?

10 A Bad memories. Things that I've gone
11 through, lots of things, you know. I can't tell you.
12 There was a lot of pages. It was over 300 pages in
13 that book.

14 Q Did you ever show that book to your
15 lawyers?

16 A No.

17 Q Did you show that book to anyone?

18 A My husband.

19 Q Did you show it to anyone else besides
20 your husband?

21 A No.

22 Q Did you tear out pages and give them to
23 Sharon Churcher?

24 A No, I wrote -- those pages that you're
25 talking about, I wrote for her specifically. She

1 wanted to know about the Prince Andrew incident.

2 Q So that's a different piece of paper?

3 A Yeah, that's just random paper.

4 Q So you had a green spiral notebook that
5 you began sometime in 2011 or 2012 in which you wrote
6 down your recollections about what had happened to
7 you, and you burned that in a bonfire in 2013.

8 Did I get that right?

9 A You got that right.

10 Q And do you have no other names of people
11 to whom you claim Ghislaine Maxwell directed you to
12 have sex, correct?

13 A At this time, no.

14 Q Is there any document that would refresh
15 your recollection that you could look at?

16 A If you have a document you'd like to show
17 me, I would be glad to look at it and tell you the
18 names I recognize off of that.

19 Q I'm just asking you if there's a document
20 you know of that has this list of names in it?

21 A Not in front of me, no.

22 Q Where is the original of the photograph
23 that has been widely circulated in the press of you
24 with Prince Andrew?

25 A I probably still have it. It's not in my

1 other terms of his probationary period?

2 A No. He went to everything that he was
3 supposed to go to.

4 Q Has he paid his fines?

5 A Yes, as far as I know.

6 Q Describe for me the contract that you had
7 with the Mail On Sunday?

8 A Could you be a little bit more specific?
9 Like --

10 Q Have you had more than one contract with
11 the Mail On Sunday?

12 A Well, there was one contract for the
13 picture. And that was to pay me 140,000 for the
14 picture. And then two stories were printed after
15 that for the amount of 10,000 each.

16 Q Is that the only money that you received
17 from the Mail On Sunday?

18 A Correct.

19 Q Did you receive any money for syndication
20 of the photograph?

21 A Isn't that what the 140 was for?

22 Q I'm asking you.

23 A Well, I don't really know what syndication
24 means.

25 Q Did you have a written contract with the

1 Mail on Sunday?

2 A Yes.

3 Q Where is that contract right now?

4 A I don't know. I've moved that many times.

5 I -- I lose paperwork wherever I go.

6 Q Is it possible it's in the boxes in
7 Sydney?

8 A I don't think I kept it, to be honest.

9 Q Did you ever refer back to it after you
10 signed it?

11 A I know I kept it for a short while, but I
12 mean, like I said, I've moved countries twice in the
13 last two years and three different houses. So the
14 paper trail is lost. I don't know where it would be.

15 Q Did you receive it via e-mail?

16 A No. I received it -- Sharon Churcher
17 handed it to me by paper.

18 Q And you signed it?

19 A I signed it.

20 Q And then did you make a copy of it?

21 A No.

22 Q You never had a copy of it?

23 A Well, I had my own copy. I'm sure she has
24 hers.

25 Q Do you recall there being a period of

1 STATE OF COLORADO)

2) ss. REPORTER'S CERTIFICATE
3 COUNTY OF DENVER)

4 I, Kelly A. Mackereth, do hereby certify
5 that I am a Registered Professional Reporter and
6 Notary Public within the State of Colorado; that
7 previous to the commencement of the examination, the
8 deponent was duly sworn to testify to the truth.

9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.

14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.

18 In witness whereof, I have affixed my
19 signature this 11th day of May, 2016.

20 My commission expires April 21, 2019.

21
22
23 Kelly A. Mackereth, CRR, RPR, CSR
24 216 - 16th Street, Suite 600
25 Denver, Colorado 80202

EXHIBIT O

Page: 1 Document Name: untitled

PANEL: _____ A07. ASSIGNMENT HISTORY YEAR: 16
 T234 Monday May 23, 2016 9:04 am
 STDT: 12870606 ROBERTS, VIRGINIA L SCHL: 3390 GR: 10 ST: I

A ENTRY		WITHDRAWAL P																		E
C	CD	DATE	OD	CD	DATE	R	PF	SY	CL	DS	SCHL	DESC	GR	PRS	ABS	UNX	Y			
—	R02	101201	—	W26	030702	N	—	02	01	—	3390	SURVIVORS	10	56	31	—	Y			
—	R02	092001	—	W02	101101	N	—	02	01	—	2331	ROYAL PALM HIG	10	13	1	—	—			
—	EA1	081401	—	W32	092001	Z	—	02	A1	—	2192	WLLNGTN HS ADL	30	—	—	—	—			
—	EA1	081600	—	W47	081301	Z	—	01	A1	—	2192	WLLNGTN HS ADL	30	—	—	—	Y			
—	EA1	062100	—	W47	081500	Z	—	00	A1	—	2192	WLLNGTN HS ADL	30	—	—	—	Y			
—	E01	081699	—	W03	081699	N	—	00	01	—	2331	ROYAL PALM HIG	10	—	—	—	—			
—	E01	081998	—	W02	060999	P	—	99	01	—	0581	FOREST HILL HI	09	155	25	—	Y			
—	E01	082097	—	W01	061098	R	—	98	01	—	2331	ROYAL PALM HIG	09	147	33	—	Y			
—	E01	082097	—	W22	082097	N	—	98	01	—	2191	WELLINGTON HIG	09	—	—	—	—			
—	R03	040797	—	W02	061197	P	—	97	01	—	1691	CRESTWOOD MID	08	40	5	—	Y			
—	E01	082294	—	DNE	082294	N	—	95	01	—	1703	ROYAL PINES SC	06	—	—	—	—			
—	E01	082393	—	W02	061094	P	—	94	01	—	1901	LOXAHATCHEE EL	05	167	13	—	Y			
—	E01	082592	—	W01	061193	P	—	93	01	—	1901	LOXAHATCHEE EL	04	176	4	—	Y			

PF1=HELP 3=EXIT 5=REFRESH 7=BKWD 8=FWD 9=NEXT PAGE 12=ESCAPE
 PAGE FULL...CONTINUE.

TERML: I1B5

TO - DISTRICT: 0000050 PALM BEACH
 GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 DEMOGRAPHIC INFORMATION FILE: SRTS12IS
 CURRENT DISTRICT: 50 PALM BEACH PAGE 1
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L (561) 712-1800
 MAILING 12959 RACKLEY RD 1310 N CONGRESS AVE
 ADDRESS: LOXAHATCHEE FL 33470 WEST PALM BEACH FL 33409
 DISTRICT STUDENT ID: 12870606 FL STUDENT ID-ALIAS: MIGRANT STUDENT ID: 000000000000
 PARENT/GUARDIAN (NAME/CODE): RACIAL/ETHNIC CATEGORY: W SEX: F
 SKY ROBERTS PARENT BIRTH VERIFICATION: 1
 LYNN ROBERTS PARENT BIRTHPLACE: SACRAMENTO CA

IMMUNIZATION STATUS: PERMANENT IMMUNIZATION CERTIFICATE
 VACCINE STATUS, DATE- VACCINE CERTIFICATE EXPIRATION DATE:
 TYPE DOSE DATE DOSE DATE DOSE DATE DOSE DATE DOSE DATE
 DTP 1 11/02/1983 2 02/03/1984 3 04/27/1984 4 04/24/1987 5 09/27/1988
 TD 1 06/24/1997
 POLIO 1 11/02/1983 2 02/03/1984 3 04/24/1987 4 09/27/1988
 HIB 1 04/24/1987
 MMR 1 04/24/1987 2 04/18/1997
 MEASLES 1 04/24/1987
 HEP B 3DOSE 1 04/18/1997 2 06/24/1997 3 09/08/1999

----- COURSE INFORMATION -----
 DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN DISTRICT: 50 SCHOOL: 1901 LOXAHATCHEE GROVES ELEM.
 YEAR: 1989-1990 GRADE LEVEL: NA YEAR: 1991-1992 GRADE LEVEL: 03
 GPA QTY PTS GPA QTY PTS T COURSE# COURSE TITLE SUBJECT CRSE CREDIT
 DISTRICT-TERM: 1.4286 5.00 CUM: 1.5429 27.00 3 5100090 THIRD GRADE AREA FLAG GRD ATT./EARN
 STATE-TERM: 1.4286 5.00 CUM: 1.5429 27.00 CREDIT, TERM: 0.00 0.00
 1989-1990 ANNUAL DAYS-PRESENT: 0 ABSENT: 0 1991-1992 ANNUAL DAYS-PRESENT: 180 ABSENT: 0
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
 ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN DISTRICT: 50 SCHOOL: 1901 LOXAHATCHEE GROVES ELEM.
 YEAR: 1990-1991 GRADE LEVEL: NA YEAR: 1992-1993 GRADE LEVEL: 04
 GPA QTY PTS GPA QTY PTS T COURSE# COURSE TITLE SUBJECT CRSE CREDIT
 DISTRICT-TERM: 1.4286 5.00 CUM: 1.5429 27.00 3 5100100 FOURTH GRADE AREA FLAG GRD ATT./EARN
 STATE-TERM: 1.4286 5.00 CUM: 1.5429 27.00 CREDIT, TERM: 0.00 0.00
 1990-1991 ANNUAL DAYS-PRESENT: 0 ABSENT: 0 1992-1993 ANNUAL DAYS-PRESENT: 176 ABSENT: 4
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
 ACADEMICALLY PROMOTED

OFFICIAL TRANSCRIPT
 THE SCHOOL DISTRICT OF
 PALM BEACH COUNTY, FLORIDA

APR 1 2008

C. Hatchett
 RECORDS CUSTODIAN

TO - DISTRICT: 0000050 PALM BEACH
 GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 COURSE INFORMATION FILE: SRTS12IS
 CURRENT DISTRICT: 50 PALM BEACH PAGE 2
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L

(561) 712-1800

DISTRICT: 50 SCHOOL: 1901 LOXAHATCHEE GROVES ELEM. DISTRICT: 50 SCHOOL: 2331 ROYAL PALM BEACH COMM HIG
 YEAR: 1993-1994 GRADE LEVEL: 05 YEAR: 1997-1998 GRADE LEVEL: 09

T	COURSE#	COURSE TITLE	AREA	FLAG	GRD	ATT./EARN	CREDIT
3	5100110	FIFTH GRADE	P		0.00	0.00	
3	5100110	FIFTH GRADE	P		0.00	0.00	
CREDIT, TERM:							0.00 0.00

1993-1994 ANNUAL DAYS-PRESENT: 167 ABSENT: 13
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
 ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
 YEAR: 1994-1995 GRADE LEVEL: NA

GPA	QTY	PTS	GPA	QTY	PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

1994-1995 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
 NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

DISTRICT: 50 SCHOOL: 1691 CRESTWOOD MIDDLE
 YEAR: 1996-1997 GRADE LEVEL: 08

T	COURSE#	COURSE TITLE	AREA	FLAG	GRD	ATT./EARN	CREDIT
2	0400010	M/J DRAMA 2	A		0.00	0.00	
2	8500240	TEEN CHALLENGES	C		0.00	0.00	
3	1001070	M/J LANG ARTS 3	C		0.00	0.00	
3	1205070	M/J MATH 3	D		0.00	0.00	
3	2002100	M/J COMPRE SCI 3	C		0.00	0.00	
3	2103050	M/J FLOR:CHA AND CHO	C		0.00	0.00	
CREDIT, TERM:							0.00 0.00

1996-1997 ANNUAL DAYS-PRESENT: 40 ABSENT: 5
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
 ACADEMICALLY PROMOTED

T	COURSE#	COURSE TITLE	AREA	FLAG	GRD	ATT./EARN	CREDIT
1	0708340	SPANISH 1	FL	RJ	F	0.50	0.00
1	1001310	ENG 1	EN	RJ	D	0.50	0.50
1	1200370	ALGEBRA IA	MA	JR	F	0.50	0.00
1	1503400	BEG AEROBICS	PE	J	F	0.50	0.00
1	2001310	ERTH/SPA SCI	SC	J	F	0.50	0.00
1	2100410	CARTBBEAN STUDIES	EL	J	F	0.50	0.00
1	8500355	NUTRITION & WELLNESS	VO		F	0.50	0.00
2	1001310	ENG 1	EN	RJ	A	0.50	0.50
2	1200370	ALGEBRA IA	MA	JR	B	0.50	0.50
2	1501300	PERS FIT	PE	RJ	A	0.50	0.50
2	2001310	ERTH/SPA SCI	SC	J	A	0.50	0.50
2	2103300	WORLD CULT GEOG	EL	J	B	0.50	0.50

DISTRICT: 50 SCHOOL: 9034 ESE - OTHER TEACHING SERV
 YEAR: 1997-1998 GRADE LEVEL: 09

T	COURSE#	COURSE TITLE	AREA	FLAG	GRD	ATT./EARN	CREDIT
4	1200370	ALGEBRA IA	MA	JR	B	0.50	0.50
5	2001310	ERTH/SPA SCI	SC	J	A	0.50	0.50
CREDIT, TERM:							7.00 4.00

GPA	QTY	PTS	GPA	QTY	PTS
DISTRICT-TERM:	1.8571	13.00	CUM:	1.8571	13.00
STATE-TERM:	1.8571	13.00	CUM:	1.8571	13.00

1997-1998 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
 SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
 NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

OFFICIAL TRANSCRIPT
 THE SCHOOL DISTRICT OF
 PALM BEACH COUNTY, FLORIDA

APR 1 2008

E. Hatchett
 RECORDS CUSTODIAN

GIUFFRE004982
 CONFIDENTIAL

C. Hatchett
RECORDS CUSTODIAN

TO - DISTRICT: 0000050 PALM BEACH
 GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 GRADUATION SUMMARY
 CURRENT DISTRICT: 50 PALM BEACH
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

FILE: SRTS1218
 PAGE 4

LEGAL NAME: ROBERTS, VIRGINIA L

(561) 712-1800

***** C U M U L A T I V E S U M M A R Y *****
 * AS OF: 03/31/2008 *

* GRADUATION OPTION: 4-YR STANDARD *

SUBJECT AREA	TOTAL TO DATE	TOTAL CREDITS NEEDED	TOTAL REMAINING
ENGLISH (EN)	2.00	4.00	2.00
MATHEMATICS (MA)	1.50	3.00	1.50
SCIENCE (SC)	1.50	3.00	1.50
AMER HISTORY (AH)	0.00	1.00	1.00
WORLD HISTORY (WH)	0.50	1.00	0.50
ECONOMICS (EC)	0.00	0.50	0.50
AMER GOVERNMENT (AG)	0.00	0.50	0.50
VOCATIONAL/ (VO/)	0.50		
PERFORM FINE ART (PF)	0.00	1.00	0.50
LIFE MGMT SKILLS (LM)	0.00	0.50	0.50
PHYSICAL ED (PE)	0.50	0.50	0.00
FOREIGN LANGUAGE (FL)	0.50		
LANGUAGE ARTS (LA)	0.00		
SOCIAL STUDIES (SS)	0.00		
ELECTIVE (EL)	2.00	9.00	6.50
ESE (EX)	0.00		
COMPUTER ED (CE)	0.00		
CREDITS, CUMULATIVE:	9.00	24.00	15.00
* * TOTALS INCLUDE VOCATIONAL & PERFORM FINE ARTS *			
GPA QTY PTS		GPA QTY PTS	
DISTRICT: 1.5429	27.00	STATE: 1.5429	27.00

VOCATIONAL PROGRAM COMPLETION STATUS-
 NUMBER: 8500355 NUTRITION & WELLNESS
 TERMINATION: IN PROGRESS COMPLETED:
 VOCATIONAL PROGRAM COMPLETION STATUS-
 NUMBER: 8300310 WORKPLACE ESSENTIALS
 TERMINATION: IN PROGRESS COMPLETED:
 VOCATIONAL PROGRAM COMPLETION STATUS-
 NUMBER: 8301610 WORK EXP 1
 TERMINATION: IN PROGRESS COMPLETED:
 VOCATIONAL PROGRAM COMPLETION STATUS-
 NUMBER: 8301650 WORK EXP-OJT
 TERMINATION: IN PROGRESS COMPLETED:

DISTRICT CLASS RANK- EFFECTIVE DATE: 03/06/2002
 CLASS RANK, NUMERICAL POSITION: 65
 CLASS RANK, PERCENTILE: 70
 CLASS RANK, TOTAL NUMBER IN CLASS: 214

DATE PASSED ASSESSMENT TEST FOR GRADUATION PURPOSES
 COMMUNICATIONS: 10/2001
 MATHEMATICS: 01/2002

COMMUNITY SERVICE HOURS: 0 REQUIREMENT MET: N

 +CERTIFIED BY: _____
 +
 +SIGNATURE: _____
 +
 +DATE: _____
 +*****

OFFICIAL TRANSCRIPT
 THE SCHOOL DISTRICT OF
 PALM BEACH COUNTY, FLORIDA

APR 1 2008

G. Hatchett
 RECORDS CUSTODIAN

GIUFFRE004984
 CONFIDENTIAL

TO - DISTRICT: 0000050 PALM BEACH
 GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 COMMENTS
 CURRENT DISTRICT: 50 PALM BEACH
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

FILE: SRTS121S
 PAGE 5

LEGAL NAME: ROBERTS, VIRGINIA L

(561) 712-1800

DEFINITION OF TERM CODES					
CODE	DEFINITION	CODE	DEFINITION	CODE	DEFINITION
1	SEMESTER 1	S	COMBINED SUMMER SESSION	B	TRIMESTER 1
2	SEMESTER 2			C	TRIMESTER 2
3	ANNUAL	T	INTERSESSION 1*	D	TRIMESTER 3
4	SUMMER SESSION 1	U	INTERSESSION 2*	6	QUARTER 1
5	SUMMER SESSION 2	V	INTERSESSION 3*	7	QUARTER 2
R	SHORT COURSE**	W	INTERSESSION 4*	8	QUARTER 3
		X	INTERSESSION 5*	9	QUARTER 4
					NONENROLLMENT***

* USED (INSTEAD OF SUMMER SCHOOL SESSIONS) WITH YEAR-ROUND SCHOOL RECORDKEEPING

** USED ONLY FOR WORKFORCE DEVELOPMENT EDUCATION (ADULT GENERAL AND POSTSECONDARY VOCATIONAL EDUCATION)

*** USED ONLY FOR REPORTING STUDENTS WHO HAVE WITHDRAWN BETWEEN SCHOOL YEARS

STATE GRADING SCALE FOR HIGH SCHOOL STUDENTS (REGARDLESS OF ENTRY DATE) EFFECTIVE SCHOOL YEAR 1997-1998

GRADE QUALITY			GRADE QUALITY			GRADE QUALITY		
GRADE	EQUIVALENT	POINTS	GRADE	EQUIVALENT	POINTS	GRADE	EQUIVALENT	POINTS
A	= 90 - 100	4.00	B	= 80 - 89	3.00	C	= 70 - 79	2.00
D	= 60 - 69	1.00	F	= 0 - 59	0.00			

GRADE QUALITY			GRADE QUALITY			GRADE QUALITY		
GRADE	EQUIVALENT	POINTS	GRADE	EQUIVALENT	POINTS	GRADE	EQUIVALENT	POINTS
A	= 94 - 100	4.00	B	= 85 - 93	3.00	C	= 77 - 84	2.00
D	= 70 - 76	1.00	F	= 0 - 69	0.00			

NOTE: FROM THE 1987-1988 THROUGH THE 1996-1997 SCHOOL YEARS, FOR STUDENTS ENTERING HIGH SCHOOL DURING THESE YEARS, THE GRADE EQUIVALENTS FOR C, D, AND F WERE: C = 75-84, D = 65-74, AND F = 0-64; QUALITY POINTS AND ALL OTHER GRADES WERE THE SAME AS THOSE SHOWN IN THE IMMEDIATELY PRECEDING STATE GRADING SCALE.

TO - DISTRICT: 0000050 PALM BEACH
 GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 COMMENTS
 CURRENT DISTRICT: 50 PALM BEACH
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

FILE: SRTS121S
 PAGE 6

LEGAL NAME: ROBERTS, VIRGINIA L

(561) 712-1800

----- STATE DEFINED COURSE FLAGS -----

E=ACADEMIC SCHOLAR-ELECTIVE
 G=GIFTED
 I=INCLUDE IN GPA
 P=COURSE IS IN PROGRESS

R=ACADEMIC SCHOLAR-REQUIREMENT
 H-HONORS
 X-EXCLUDE FROM GPA
 S=CREDIT AWARDED BY SLEP EXAM

9=NINTH GRADER
 N=NO CREDIT
 W-EXCLUDE FROM STATE GPA
 T=TRANSFERRED COURSE

VOCATIONAL SUBSTITUTION COURSES-

\$=JOURNALISM SUB FOR PRAC ARTS

2=SUB FOR BUS EN I 1001440

5=SUB FOR MA I 1205380/II 1205390

8=SUB FOR PRE ALGEBRA 1200300

K=JROTC NAVY SUB FOR SCIENCE

@=SUB FOR BIO TECH 2000430

*=SUBSTITUTE FOR COURSE SPECIFIED ON FOLLOWING LINE ON COURSE LIST

0=JROTC SUB FOR PRACTICAL ARTS

3=SUB FOR BUS EN I 1001440/II 1001450

6=SUB FOR GEN SCI 2002310

A=JROTC CST GD SUB FOR SCIENCE

O=JROTC ARMY SUB FOR LIFE MGMT

#=SUB FOR ENV SCI 2001340

&=JROTC AIR FC SUB FOR LIFE MGMT

1=COMP ED SUB FOR PRACTICAL ARTS

4=SUB FOR MA I 1205540

7=SUB FOR ANAT PHYSIO 2000350

F=JROTC AIR FC SUB FOR SCIENCE

Q=JROTC MARINE SUB FOR LIFE MGMT

%=SUB FOR PHY SCI 2003310

ELL INSTRUCTION-

M=HOME LANGUAGE INSTRUCTION

D=ESOL INSTRUCTION

B=HOME LANGUAGE &/OR ESOL INSTRUCTION (ELEMENTARY SELF-CONTAINED)

----- FY 1991-1992 COMMENTS -----

THE PALM BEACH COUNTY SCHOOL DISTRICT AWARDS THE HIGH SCHOOL VALIDICTORIAN
 AND SALUTATORIAN USING A WEIGHTED GPA AVERAGE THAT IS BASED ON COURSES TAKEN
 IN GRADES 9 - 12. HOWEVER, THE DISTRICT GPA INCLUDES ALL CREDIT COURSES.

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 CONFIDENTIAL

TO - DISTRICT: 0000050 PALM BEACH SCHOOL: 3390 CATEGORY B INFORMATION FILE: SRTS121S
 GRADE LEVEL: 10 PREPARED DATE: 03/31/2008 CURRENT DISTRICT: 50 PALM BEACH PAGE 7
 [REDACTED] CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L (561) 712-1800

WITHDRAWAL-DATE: 03/07/2002 CODE: W26

HOME LANGUAGE SURVEY DATE: 06/15/2000
 NATIVE LANGUAGE: EN ENGLISH

COUNTRY OF BIRTH: US UNITED STATES
 PRIMARY HOME LANGUAGE: EN ENGLISH

HEALTH EXAMINATION, SCHOOL ENTRY: Y SCHOOL ENTRY HEALTH EXAMINATION CERTIFIED.

----- EXCEPTIONAL STUDENT INFORMATION -----
 STUDENT PLAN DATE: 05/11/1999 CURRENT EVALUATION/RE-EVALUATION DATE: 05/11/2002
 PRIMARY EXCEPTIONALITY: Z FEFP PROGRAM:

----- EXCEPTIONAL STUDENT PROGRAM INFORMATION -----

EXCEPTIONALITY	PLACEMENT STATUS	REFERRAL DATE	EVALUATION COMPLETE DATE	ELGB DETERM DATE	PLACE- MENT DATE	DISMISS- SAL DATE
HOSPITAL/HOMEBOUND	ELIGIBLE AND PLACED	05/10/99	05/11/99	05/11/99	05/11/99	05/08/99
HOSPITAL/HOMEBOUND	ELIGIBLE AND PLACED	02/03/98	02/04/98	02/04/98	02/04/98	06/11/98

----- DROPOUT PREVENTION PROGRAM INFORMATION -----

DROPOUT PREVENTION PROGRAM	PLACEMENT REASONS	OUTCOMES
EDUCATIONAL ALTERNATIVE PROGRMS	ACADEMICALLY UNSUCCESSFUL	DOCUMNTD IMPRVD ACADMC PERFORMANCE
EDUCATIONAL ALTERNATIVE PROGRMS	ACADEMICALLY UNSUCCESSFUL	DOCUMNTD IMPRVD ACADMC PERFORMANCE
EDUCATIONAL ALTERNATIVE PROGRMS	ACADEMICALLY UNSUCCESSFUL	DOCUMNTD IMPRVD ACADMC PERFORMANCE

----- TEST INFORMATION -----

TEST INFORMATION:											
TEST	TEST	LEVEL	SUBJECT	SCORE	SCORE	SUBJECT	SCORE	SCORE	SUBJECT	SCORE	SCORE
GRD DATE	NAME	FORM	CONTENT	TYPE	TYPE	CONTENT	TYPE	TYPE	CONTENT	TYPE	TYPE
30 06/16/2000	TAB	7 A	TOTBAT	GE 0000		MATH(T)	GE 0000		READ(T)	GE 0000	
			LANGUAGE	GE 0110							
30 06/15/2000	TAB	7 A	TOTBAT	GE 0000		MATH(T)	GE 0000		READ(T)	GE 0126	
			LANGUAGE	GE 0000							
30 06/15/2000	TAB	7 M	TOTBAT	GE 0000		MATH(T)	GE 0073		READ(T)	GE 0000	
			LANGUAGE	GE 0000							
09 04/20/1998	CTB	A 19	COMPREHE	SS 0801		COMPREHE	NP 0085		PROB/SLV	SS 0759	
			PROB/SLV	NP 0034		SCIENCE	SS 0000		SCIENCE	NP 0000	
			SS/ENVIR	SS 0000		SS/ENVIR	NP 0000				

TO - DISTRICT: 0000050 PALM BEACH
 GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 TEST INFORMATION FILE: SRTS12IS
 CURRENT DISTRICT: 50 PALM BEACH PAGE 8 OF 8
 CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L

(561) 712-1800

TEST INFORMATION:

TEST GRD DATE	TEST NAME	LEVEL FORM	SUBJECT CONTENT	SCORE TYPE	SCORE TYPE	SUBJECT CONTENT	SCORE TYPE	SCORE TYPE	SUBJECT CONTENT	SCORE TYPE	SCORE TYPE
08 04/15/1997	CTB	B 17	READ(T)	SS 0000		READ(T)	NP 0000		MATH(T)	SS 0000	
			MATH(T)	NP 0000		COMPREHE	SS 0780		COMPREHE	NP 0077	
			COMPUTAT	SS 0000		COMPUTAT	NP 0000		VOCAB	SS 0000	
08 04/15/1997	CTB	B 17	VOCAB	NP 0000		PROB/SLV	SS 0788		PROB/SLV	NP 0070	
05 04/22/1994	CTB	B 15	COMPREHE	SS 0708		COMPREHE	NP 0032		PROB/SLV	SS 0667	
			PROB/SLV	NP 0010		LANGUAGE	SS 0694		LANGUAGE	NP 0026	
			CAP/MECH	SS 0646		CAP/MECH	NP 0008		USAGE/EX	SS 0742	
05 04/22/1994	CTB	B 15	USAGE/EX	NP 0061							
04 03/29/1993	CTB	A 14	READ(T)	SS 0711		READ(T)	NP 0059		MATH(T)	SS 0668	
			MATH(T)	NP 0022		COMPREHE	SS 0735		COMPREHE	NP 0074	
			COMPUTAT	SS 0667		COMPUTAT	NP 0021		VOCAB	SS 0686	
04 03/29/1993	CTB	A 14	VOCAB	NP 0043		PROB/SLV	SS 0669		PROB/SLV	NP 0024	
			SCIENCE	SS 0707		SCIENCE	NP 0049		SS/ENVIR	SS 0692	
			SS/ENVIR	NP 0034							
04 02/10/1993	WAP	04	WR NARRA	SS 0000		WR EXPOS	SS 0000		WRITING	SS 0000	
03 04/08/1992	CTB	A 13	COMPREHE	SS 0733		COMPREHE	NP 0085		PROB/SLV	SS 0649	
			PROB/SLV	NP 0026		LANGUAGE	SS 0696		LANGUAGE	NP 0050	
			CAP/MECH	SS 0679		CAP/MECH	NP 0044		USAGE/EX	SS 0712	
03 04/08/1992	CTB	A 13	USAGE/EX	NP 0056							
02 04/16/1991	CTB	A 12	READ(T)	SS 0663		READ(T)	NP 0060		MATH(T)	SS 0467	
			MATH(T)	NP 0001		COMPREHE	SS 0659		COMPREHE	NP 0051	
			COMPUTAT	SS 0337		COMPUTAT	NP 0001		VOCAB	SS 0667	
02 04/16/1991	CTB	A 12	VOCAB	NP 0070		PROB/SLV	SS 0597		PROB/SLV	NP 0025	

***** END OF TRANSCRIPT *****

GIUFFR004988
 CONFIDENTIAL

EXHIBIT P

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRÉ,

Plaintiff,

v.

GHI SLAINE MAXWELL,

Defendant.

-----/

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 1 of 2

Pages 1 - 157

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

TIME: Commenced: 8:59 a.m.
Concluded: 1:22 p.m.

PLACE: Southern Reporting Company
B. Paul Katz Professional Center
(SunTrust Building)
One Florida Park Drive South
Suite 214
Palm Coast, Florida 32137

REPORTED BY: LEANNE W FITZGERALD, FPR
Florida Professional Reporter
Court Reporter and Notary Public

APPEARANCE OF COUNSEL

ON BEHALF OF THE PLAINTIFF:

BRADLEY J. EDWARDS, Esquire
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.
425 North Andrews Avenue
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954-524-2820
Brad@pathjustice.com

ON BEHALF OF THE DEFENDANT:

LAURA A. MENNINGER, Esquire
Haddon, Morgan and Foreman, P.C.
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Denver, Colorado 80203
303-831-7364
Lmenninger@hmf law.com Nsimmons@hmf law.com

Also appearing: Jenny Martin, Videographer from Abel
Virginia Giuffre, Plaintiff

I N D E X

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S T I P U L A T I O N

It is hereby stipulated and agreed by and
between counsel present at this deposition and by
the deponent that the witness review of this
deposition would be waived.

I N D E X O F E X H I B I T S

(MARKED BY THE DEFENDANT:)

Defendant's Exhibit 1	42
(Palm Beach County Sheriff's Reports - Case Number 98041883)	
Defendant's Exhibit 2	71
(Greenacres Reports)	
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(Palm Beach County Sheriff's Reports - Case Number 02075321)	
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(Robert's School Records)	

- - -

(MARKED BY THE PLAINTIFF:)

Plaintiff's Exhibit 1	162
(Photos)	
Plaintiff's Exhibit 2	163
(Passport)	

- - -

1 BY MS. MENNINGER:

2 Q And where did you go after Royal Palm
3 Beach?

4 A I believe it was South Area. I'm pretty
5 sure it was South Area.

6 Q Did you go to another school after that?

7 A Yeah. I went to Gold Coast after that.

8 Q Is that also in Royal Palm Beach?

9 A No. That's -- South Area was in Lake
10 Worth. Gold Coast is in West Palm They were both
11 alternative schools.

12 Q Did you ever go to a Survivors Charter
13 School?

14 A Yes. I went there, too.

15 Q When did you go there?

16 A I'm not exactly sure of the date. But it
17 was somewhere after either -- I'm pretty sure it
18 was -- maybe -- I can't remember if it was Gold
19 Coast first or Survivor. But one of the -- I'm
20 trying to remember. I honestly don't remember which
21 one came first.

22 Q That's all right.

23 Can you describe for me Survivors Charter
24 School? What is it like, or was it like?

25 A I mean, like I said, it was an alternative

1 school. It was just pretty much a bunch of bad
2 kids, you know, who have gotten kicked out. And it
3 was pretty much like a last chance kind of school,
4 you know what I mean?

5 Q Does it look like a school?

6 A Kind of. I mean, it had, like, a
7 cafeteria, and then it had a whole bunch of, like,
8 portables and stuff around there. And it was
9 under -- it was, like, right near the Lake Worth. I
10 remember there was, like, a bridge that went over
11 the interstate right by it. But, I mean, it was
12 just a little, you know, little crappy school.

13 Q Was it during the day or at night?

14 A It was during the day.

15 Q So regular school hours?

16 A Yeah. Well, it was actually a little bit
17 shorter hours. I can't remember exactly. But I
18 know it was not like the full days. Because, I
19 mean, at the alternative schools, it's obviously not
20 up to regular high school standards. I mean, they
21 just do pretty much stuff to get people to get out
22 of school, you know, so...

23 Q Get the credits that you need?

24 A Yeah. So that way they can finish high
25 school and not drop out and whatnot, so...

1 Q You actually go there in the morning,
2 though, and take classes?

3 A Yeah.

4 Q And get checked in at attendance?

5 A Yeah.

6 Q And then you may leave a little earlier
7 than a regular school day?

8 A Uh-huh (affirmative).

9 Q All right. It's not a online program?

10 A No, it was not online.

11 Q When you were at Survivors Charter School,
12 did you ever see Ms. Roberts there?

13 A Was it Survivors? I don't remember if it
14 was Survivors. Or was it -- because I'm pretty sure
15 we were both -- was it -- I know we both went to one
16 of the schools. I'm pretty sure it was Survivors,
17 maybe.

18 Q Did you see her there?

19 A Now, when we went to the school, like, we
20 were together afterwards. But I don't remember
21 exactly which one it was. I know it was one of
22 those alternative schools that we went to, though.

23 Q Okay. Did you -- was Wellington an
24 alternative school?

25 A No. Wellington is a -- is a real high

1 school, like a regular high school.

2 Q Do you know if Wellington has an adult
3 program?

4 A They might. I mean, I really don't know.
5 I'm not sure.

6 Q Did you ever take night classes there?

7 A No.

8 Q So you believe when you reunited with
9 Ms. Roberts in or around 2001, she had also gone to
10 one of those alternative schools?

11 A When I reunited with her, no. We ended
12 up, like, trying to go finish school.

13 Q Tell me about that.

14 A I mean, we just ended up going to one of
15 those alternative schools and didn't even finish
16 that.

17 Q So you two had both left school, but went
18 back together --

19 A Yeah.

20 Q -- to one of the alternative schools?

21 A Yeah.

22 Q And that may have been Survivors Charter
23 School?

24 A Yeah. I'm pretty sure it probably was.
25 I'm pretty sure.

1 Q You both wanted to get your GEDs?

2 A Yeah.

3 Q Get better jobs?

4 A Uh-huh (affirmative).

5 Q Things like -- that was the plan?

6 A Yeah.

7 Q But it did not work out?

8 A Yeah.

9 Q Do you know how long the two of you went
10 to Survivors Charter School?

11 A I honestly don't remember.

12 Q Okay. You do have a recollection of going
13 with her, though?

14 A Yeah.

15 Q Seeing her there?

16 A Uh-huh (affirmative).

17 Q I'm trying to get a little bit of a time
18 frame on the time that you reunited with
19 Mr. Roberts. I know you said you lived -- you
20 remember being in an apartment with her in September
21 of 2000 -- 9/11/2001; right?

22 A Yeah.

23 Q Do you think you had been together with
24 her for a while at that point?

25 A It was probably, I'd say, like a month or

1 so. Like, I'm pretty sure. Because it was not too
2 long after I had moved in, so...

3 Q And just to be clear, she already lived in
4 the apartment?

5 A Yeah. She lived in the apartment with her
6 ex-boyfriend Michael and JJ. And I think there was
7 somebody else. I don't remember who, though.

8 Q All right. That's where she was living
9 when you reunited with her?

10 A Yeah.

11 Q And then you moved in?

12 A Yeah.

13 Q Did the other people move out?

14 A Yeah. I kicked them out.

15 Q How long did you live there with
16 Ms. Roberts?

17 A I think it was just till, like, the end of
18 the lease, so it was probably maybe, like, five or
19 six months. I'm pretty sure. I don't know. I'm
20 not exactly [sic] on the whole time frame.

21 Q That's okay. I understand it was a while
22 ago.

23 A Yeah.

24 Q Where did you two move from there?

25 A I believe we either -- we went to her --

1 it was either her family's house or mine. It was
2 either one of the two. And then we ended up getting
3 another -- we were renting a house out in
4 Loxahatchee also, eventually. But we also stayed in
5 a little trailer behind her parents' house.

6 Q When did your relationship with
7 Ms. Roberts end the second time?

8 A When she went to Thailand and --
9 (Brief interruption.)

10 A -- never heard from her again.

11 THE COURT REPORTER: I'm sorry. Can you
12 re-answer?

13 A Yeah. When Jeffry sent her to Thailand.
14 And then I never heard from her again until
15 freaking, like, two days ago.

16 BY MS. MENNINGER:

17 Q You heard from her two days ago?

18 A Yeah. She had called me to apologize
19 about, obviously, everything about me getting
20 dragged into this mess. And we talked just pretty
21 much about, you know, the way shit ended, and pretty
22 much tried just -- her apologizing mainly about
23 dragging me all into this and having to make me
24 get -- you know, knowing how I have my family and
25 stuff now. And that was pretty much it, so...

1 Q Another instant connection.

2 A Uh-huh (affirmative).

3 Q From the time M^s. Roberts left to go to
4 Thailand until today, have you seen her?

5 A Nope.

6 And to be honest, it still does not even
7 feel real that she's sitting right there across from
8 me.

9 Q Well, you offered to get in touch with her
10 a couple of times?

11 A I know. But, like I said, it's just -- it
12 still does not seem like this is actually happening.
13 Like, she's -- I don't know. It's like talking to a
14 ghost or seeing one.

15 Q Does she look different now?

16 A Yeah.

17 Q How?

18 A Just more mature, more older.

19 Q When you were with M^s. Roberts the first
20 time in '98 --

21 A Uh-huh (affirmative).

22 Q -- you believe that relationship lasted
23 just a couple of weeks?

24 A Yeah. I'm not exactly sure, but it was
25 pretty brief.

1 A I believe so, yes.

2 Q What did she tell you about that?

3 A I -- I think that maybe he -- I mean, I
4 don't know exactly. I don't really remember. I
5 remember hearing about him, but I don't remember
6 what she said about him.

7 Q Did Ms. Roberts ever tell you that she had
8 met Al Gore?

9 A Not that I'm aware of.

10 Q Did Ms. Roberts ever tell you that she had
11 met a foreign president?

12 A I'm not sure; I'm not sure.

13 Q Did Ms. Roberts ever tell you she had met
14 a prime minister?

15 A I don't know.

16 Q Did Ms. Roberts ever tell she had met a
17 senator?

18 A Not that I'm aware of. I mean, she's told
19 me that she met a bunch of people before. And after
20 it started becoming, like, an almost everyday thing
21 about -- just hearing about famous people with
22 Jeffrey and stuff like that, it's, like, I kind of
23 didn't, like, tune it out, but I just -- it became
24 normal, so I just stopped, like, listening to all
25 the details, because I was not going to meet these

1 people, you know what I mean? It's just, like, all
2 right.

3 Q Was she excited that she was meeting
4 famous people?

5 A Yeah.

6 Q Was that a job perk?

7 A Obviously.

8 Q She talked about it a lot?

9 A Yeah.

10 Q To the point where you were drowning it
11 out?

12 A Well, that's what I'm saying. It was not
13 like I was drowning it out. It's just I knew that
14 she was with Jeffrey, and he was, obviously,
15 well-connected with everybody. So it was not like,
16 you know, a special occasion, per se. You know, it
17 was, but it's not like it was -- it was not very not
18 rare so...

19 Q Did she show you any photographs of
20 herself with famous people?

21 A No.

22 Q Did you see a photograph of her with
23 Prince Andrew --

24 A Yes.

25 Q -- in her possession?

1 BY MS. MENNINGER:

2 Q Mr. Figueroa, you mentioned that you and
3 Ms. Roberts attempted to go to back to school while
4 you were together --

5 A Yes.

6 Q -- to get your GED?

7 A Yeah. Yes.

8 Q And you believe that you went to the
9 Survivors Charter School?

10 A Yes.

11 MS. MENNINGER: Okay. I'm going to mark
12 Defendant's Exhibit 6.

13 (Defendant's Exhibit 6 was marked for
14 identification.)

15 BY MS. MENNINGER:

16 Q This is a school record for Ms. Roberts
17 that lists the names of various schools. And --

18 A So it was Survivors, obviously. That's
19 the only one on that list that isn't -- or that's
20 there that's on mine, as well.

21 Q Okay.

22 A Other than the other ones, but...

23 Q All right. So you recognize Survivors
24 Charter School on Ms. Roberts' school records?

25 A Yeah. That's what I'm saying. Since that

1 is the one on here, that's -- that's completely
2 clear. I could not remember if it was that one or
3 Gold Coast.

4 Q Okay. There is an entry date for
5 Ms. Roberts at Survivors Charter School of
6 10/12/2001, and a withdrawal on 3/7 of '02. Do you
7 see that?

8 A I mean, it's this; right? I mean, that's
9 the top.

10 Q The entry date of 10/12/01, withdrawal
11 3/7/02 at Survivors?

12 A Okay. I did not know what those
13 numbers -- I did not realize that that was a date.

14 Q I understand. And I know you did not make
15 this record.

16 So I'm just wanting to know if that's
17 consistent with your recollection, that you guys
18 went to school in the fall of 2001 until the --

19 A Yeah, that sounds about right.

20 Q -- March of 2002. It sounds right?

21 A Yeah.

22 Q And you both went to school together?

23 A Uh-huh (affirmative).

24 Q In the mornings?

25 A Yeah.

1 Q And got out of school at some earlier time
2 than a regular school day?

3 A Yeah.

4 Q Do you recall Mr. Roberts going to Royal
5 Palm Beach High? Again, this is in the 2001 time
6 frame.

7 A I -- I don't recall. I really don't.

8 Q Do you recall her, during the time you
9 were with her, taking any night classes at
10 Wellington High School?

11 A I don't recall.

12 Q Is it possible?

13 A It's a possibility.

14 MR. EDWARDS: Object to the form

15 BY MS. MENNINGER:

16 Q Do you know whether Wellington has a night
17 school program?

18 A Like I said before, I don't know. They
19 could.

20 Q You went there in ninth grade?

21 A Yeah. It was during the day, though. I
22 have no clue about night school.

23 Q Got it.

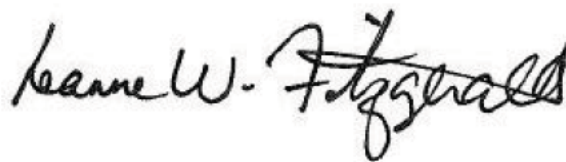
24 But you do have a memory about Survivors
25 Charter School?

CERTIFICATE OF OATH

STATE OF FLORIDA)
)
COUNTY OF FLAGLER)

I, the undersigned authority, certify that TONY
FIGUEROA personally appeared before me on
June 24, 2016, and was duly sworn.

WITNESS my hand and official seal this 5th day
of July, 2016.



Leanne W. Fitzgerald
Notary Public - State of Florida
My Commission No. FF060921
Expires: February 8, 2018

Digital Certificate Authenticated
By Symantec

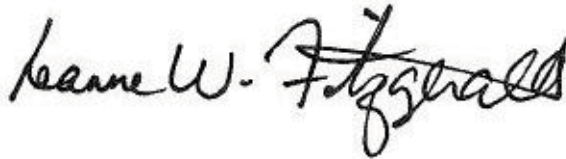
CERTIFICATE OF REPORTER

STATE OF FLORIDA)
)
COUNTY OF VOLUSIA)

I, Leanne W Fitzgerald, Court Reporter, do hereby certify that I was authorized to and did stenographically report the deposition of TONY FIGUEROA; and that the foregoing transcript is a true record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 5th day of July, 2016.



Leanne W. Fitzgerald, FPR
Florida Professional Reporter

Digital Certificate Authenticated
By Symantec

EXHIBIT Q

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEO DEPOSITION OF
VIRGINIA GIUFFRE, VOLUME II

November 14, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHI SLAINE MAXWELL,

Defendant.

APPEARANCES:

BOIES, SCHILLER & FLEXNER LLP

By Sigrid S. McCawley, Esq.
401 East Las Olas Boulevard
Suite 1200
Fort Lauderdale, FL 33301
Phone: 954.356.0011
smccawley@bsfllp.com

Appearing on behalf of the Plaintiff

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P. C.

By Laura Menninger, Esq.

3 Jeffrey S. Pagliuca, Esq.

150 East 10th Avenue

4 Denver, CO 80203

Phone: 303.831.7364

5 lmenninger@hmf law.com

jpagliuca@hmf law.com

6 Appearing on behalf of the

7 Defendant

Also Present:

8 Ann Lundberg, Paralegal

9 Maryvonne Tompkins, Videographer

Pursuant to Notice and the Federal Rules
of Civil Procedure, the continued video
deposition of VIRGINIA GIUFFRE, called by Defendant,
was taken on Monday, November 14, 2016, commencing at
8:04 a.m., at 150 East 10th Avenue, Denver, Colorado,
before Pamela J. Hansen, Registered Professional
Reporter, Certified Realtime Reporter and Notary
Public within Colorado.

* * * * *

I N D E X

VIDEO DEPOSITION OF VIRGINIA GIUFFRE, VOLUME II

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1 A Yes.

2 Q And you believe the Neiman Marcus was
3 located in which city?

4 A Well, it's around Fort Lauderdale. I
5 can't tell you exactly. Fort Lauderdale is so big,
6 like Broward County? Is that the word for it?

7 Q And what did you do at Neiman Marcus?

8 A I worked in the changing rooms.

9 Q And what did you do in the changing room?

10 A I think I just like -- if I remember
11 right, I just put clothes away that people left in
12 there. Probably went out to get sizes, different
13 sizes for women who wanted different sizes of the
14 same product.

15 Q And where did you work after Neiman
16 Marcus?

17 A Taco Bell.

18 Q Did you work at Southeast Employee
19 Management Company?

20 A I don't recognize that. I don't know if
21 that's a payroll company or what it is. I don't know
22 what Southeast -- what is it called?

23 Q Southeast Employee Management Company.

24 A No, I don't remember that.

25 Q Did you ever work as a temp?

1 A Not that I remember.

2 Q Going to different offices and filling in?

3 A No.

4 Q Did you work for Oasis Outsourcing?

5 A I don't -- I don't know if that's a
6 payroll company or if that's an actual place, but
7 that doesn't ring a bell.

8 Q Did you -- do you know how much you got
9 paid when you were working at places like Oasis
10 Outsourcing?

11 A Well, considering I don't know if I worked
12 at Oasis Outsourcing, I wouldn't even know how much I
13 got paid.

14 Q Did you review your Social Security
15 records?

16 A Yes.

17 Q You saw Oasis Outsourcing listed there?

18 A Right, but like I said, it doesn't even
19 ding a bell at all.

20 Q Do you know how much money they said you
21 made from them?

22 MS. MCCAWLEY: Objection. If you want to
23 show her the documents, she can see what amount is
24 listed and answer your questions, but if you're not
25 going to show her the document, that's the best she

1 don't know where I was living.

2 Q Okay. Did you indicate whether you had
3 gone to school?

4 A Yes, I did.

5 Q What did you indicate?

6 A I indicated that I attended Survivors
7 Charter School for four years and had a high school
8 diploma.

9 Q And you graduated?

10 A Well, I didn't. I just wanted to get a
11 job, and I wanted it to look good, so I fluffed it
12 up.

13 Q So you wrote that down in your handwriting
14 on this application, correct?

15 A I did.

16 Q And it was not true, correct?

17 A Again, I'm not proud of it. I just didn't
18 have any other way of getting a job and I just
19 thought if I put that down there, I might be
20 considered.

21 Q You indicated when you were younger you
22 volunteered for six years at a riding clinic. What's
23 the name of the riding clinic?

24 A Vince Rams. And I'm not too sure if it
25 was six years, but I started off there quite young,

1 a former employer is the Indigo Bar and Grill,
2 correct?

3 A Yes.

4 Q Is that true?

5 A No, it was not.

6 Q On the page before that, it indicates you
7 went to Royal Palm Beach High School. Is that in
8 your handwriting?

9 A Yes, it is.

10 Q And it says you went for four years and
11 you graduated?

12 A Yes.

13 Q In your handwriting?

14 A Yes.

15 Q Is that true?

16 A No.

17 Q This was an application you filled out in
18 January of 2014, correct?

19 A Correct.

20 Q The page before that is your -- portion of
21 your resume I think we have previously discussed, but
22 just confirming, you did send that resume to this job
23 application, correct?

24 A I did.

25 Q And you indicated you had worked at

1 STATE OF COLORADO)

2) ss. REPORTER' S CERTI FI CATE

3 COUNTY OF DENVER)

4 I, Pamela J. Hansen, do hereby certify that
5 I am a Registered Professional Reporter and Notary
6 Public within the State of Colorado; that previous to
7 the commencement of the examination, the deponent was
8 duly sworn to testify to the truth.

9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.

14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.

18 In witness whereof, I have affixed my
19 signature this 23rd day of November, 2016.

20 My commission expires September 3, 2018.

21
22 _____
23 Pamela J. Hansen, CRR, RPR, RMR
24 216 - 16th Street, Suite 600
25 Denver, Colorado 80202

EXHIBIT R

SSA-1826

ITEMIZED STATEMENT OF EARNINGS

SOCIAL SECURITY ADMINISTRATION
OFFICE OF CENTRAL OPERATIONS
6100 WABASH AVENUE
BALTIMORE MARYLAND 21215

Date: 10/25/2016

|||||
BOIES SCHILLER AND FLEXNER
401 E LAS OLAS BLVD STE 1200
FORT LAUDERDALE FL 33301-2211

We are sending the statement of earnings requested for:

Number Holder's Name: VIRGINIA GIUFFRE
Social Security Number: [REDACTED]

Years Requested: 1998 THRU 2002; 2013 THRU 2015

Control Number: 16294125319
Remittance Number: 201610240012

Enclosure(s):
Earnings Statement

GIUFFRE009175

CONFIDENTIAL

SSA-1826

ITEMIZED STATEMENT OF EARNINGS

SOCIAL SECURITY ADMINISTRATION
EARNINGS RECORD INFORMATION

Date: 10/25/2016

Our records show the amount of earnings reported, not the amount of Social Security taxes that were paid.

Wages were first covered under Social Security in 1937. Therefore, 1937 is the first year for which earnings may be shown on our records. Employers were required to report earnings semi-annually in 1937, and on a quarterly basis for the years from 1938 through 1977. Beginning with 1978, employers are required to report earnings annually.

Our records do not show the exact date of employment (month and day) because we do not need this information to figure Social Security benefits. Employers do not give us this information.

Each year, there is a maximum amount of earnings that is subject to Social Security taxes and is used to compute benefits. If a person earns more than this maximum amount, the earnings statement will usually show the maximum rather than the total earnings. Maximum benefits can be found on the SSA website.
<http://www.ssa.gov/OACT/COLA/cbb.html>

Beginning in 1951, self-employed persons could also receive Social Security credit for their work. The maximum amounts of self-employment earnings that are subject to Social Security taxes and are used to compute benefits can also be found on the SSA website.
<http://www.ssa.gov/OACT/COLA/cbb.html>

If you have any questions, you should call, write, or visit any Social Security office. If you visit or call, please bring this letter. It will help us answer questions. The toll free number to call is 1-800-772-1213 (for the deaf or hard of hearing, call our TTY number, 1-800-325-0778).

GIUFFRE009176

CONFIDENTIAL

SSA-1826

ITEMIZED STATEMENT OF EARNINGS
* * * FOR SSN [REDACTED] * * *

FROM: SOCIAL SECURITY ADMINISTRATION
OFFICE OF CENTRAL OPERATIONS
6100 WABASH AVENUE
BALTIMORE MARYLAND 21215

NUMBER HOLDER NAME: VIRGINIA GIUFFRE
YEARS REQUESTED: 1998 THRU 2002; 2013 THRU 2015

BOIES SCHILLER AND FLEXNER
401 E LAS OLAS BLVD STE 1200
FORT LAUDERDALE FL 33301

EMPLOYER NUMBER: [REDACTED]
KFC USA INC
% PAYROLL DEPT
5200 COMMERCE CROSSING DR
LOUISVILLE KY 40229-2182

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					\$140.70

EMPLOYER NUMBER: [REDACTED]
PUBLIX SUPER MARKETS INC
PO BOX 32018
LAKELAND FL 33802-2018

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					\$216.69

EMPLOYER NUMBER: [REDACTED]
ASCENSION CHILD CARE CENTER
ASCENSION PEACE CHILD CARE CENTER
2701 N STATE ROAD 7
LAUD LAKES FL 33313-2731

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					\$216.97

SSA-1826

ITEMIZED STATEMENT OF EARNINGS

* * * FOR SSN [REDACTED] * * *

EMPLOYER NUMBER: [REDACTED]
 AVICULTURAL BREEDING & RESEARCH
 CENTER
 % ERNEST LAKS
 14201 125TH AVE N
 WEST PALM BCH FL 33418-7945

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$99.48

EMPLOYER NUMBER: [REDACTED]
 SOUTHEAST EMPLOYEE MANAGEMENT
 COMPANY
 2559 PALM DEER DR
 LOXAHATCHEE FL 33470-2563

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$3,212.44

EMPLOYER NUMBER: [REDACTED]
 MAR-A-LAGO CLUB LLC
 TRUMP DONALD J GEN PTR
 % TRUMP ORGANIZATION
 1100 S OCEAN BLVD
 PALM BEACH FL 33480-5004

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$1,866.50

EMPLOYER NUMBER: [REDACTED]
 OASIS OUTSOURCING VI INC
 2054 VISTA PKWY STE 300
 WEST PALM BCH FL 33411-6742

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$2,037.60

EMPLOYER NUMBER: [REDACTED]
 NEIMAN-MARCUS GROUP LLC
 % NEIMAN MARCUS GROUP LTD SOLE MBR
 1201 ELM ST
 DALLAS TX 75270-2102

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					\$1,440.79

SSA-1826

ITEMIZED STATEMENT OF EARNINGS

* * * FOR SSN [REDACTED] * * *

EMPLOYER NUMBER: [REDACTED]
 MANNINOS INC
 MANNINOS RESTAURANT
 12793 B W FOREST HILL BLVD
 WEST PALM BEACH FL 33414-4749

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2001					\$212.00

EMPLOYER NUMBER: [REDACTED]
 CCI OF ROYAL PALM INC
 % ROBERT FURR TTEE
 2255 GLADES RD STE 337-W
 BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$403.64

EMPLOYER NUMBER: [REDACTED]
 ROADHOUSE GRILL INC
 ROBERT C FURR TTEE IN BANKRUPTCY
 2255 GLADES RD STE 337W
 BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$1,247.90

EMPLOYER NUMBER: [REDACTED]
 MARC PINKWASSER DVM PA
 13860 WELLINGTON TRCE STE 31
 WELLINGTON FL 33414-8541

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					\$1,561.75

EMPLOYER NUMBER: [REDACTED]
 GREAT OUTDOORS PREMIER RV-GOLF
 RESORT COMMUNITY SVC ASSOC INC
 145 PLANTATION DR
 TITUSVILLE FL 32780-2528

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2014					\$171.83

SSA-1826

ITEMIZED STATEMENT OF EARNINGS
* * * FOR SSN [REDACTED] * * *

***** THERE ARE NO OTHER EARNINGS RECORDED UNDER THIS *****
***** SOCIAL SECURITY NUMBER FOR YEAR(S) REQUESTED *****

PAGE 4

GIUFFRE009180

CONFIDENTIAL

EXHIBIT S



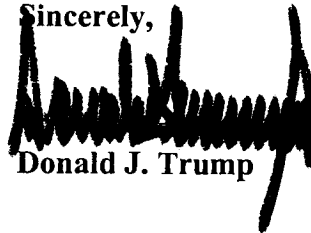
January 30, 2003

To Whom It May Concern,

Skye Roberts has been a most valuable employee at The Mar-a-Lago Club since April of 2000. While employed as a maintenance crew team member, he has been responsible for maintaining the five championship red-clay tennis courts as well as keeping all of the individual air conditioning units working and in tip-top shape.

It is my understanding that Skye is relocating to Colorado. Should he ever return to Florida, he would be eligible for re-hire.

Sincerely,



Donald J. Trump

The Mar-a-Lago Club, L.C.

PALM BEACH, FLORIDA

1100 South Ocean Boulevard, Palm Beach, Florida 33480 (407) 832-2600 Fax (407) 832-2669

MAR-A-LAGO-0001

TERMINATIONS

LAST NAME	FIRST NAME	
Abbott	Philip	Box #1
Acevedo	Michael	Box #4
Adams	Zane	Box #3
Adams	Cynthia	Box #1
Adams	Patrick	Box #1
Addison	Andrea	Box #4
Adelfio	Peter	Box #4
Adler	Jessica	Box #1
Aldahondo	Francisco	Box #6
Alexis	Genicia	Box #3
Allen	Suzanne	Box #1
Almeida	Tiberio	Box #4
Almgren	Shane	Box #3
Alves	Victor	Box #4
Anaya	Orlando	Box #4
Anderson	Sandra	Box #6
Andres-Felix	Francisco	Box #4
Annunziata	Susan	Box #3
Anton	Frank	Box #1
Aquino	Jorge	Box #4
Argueta	Irma	Box #3
Armstrong	April	Box #4
Ash	Carol	Box #6
Ashenbrenner	William	Box #3
Auguste	Firenze	Box #6
Bacon	John	Box #4
Bader	Susan	Box #1
Bader	Erwin	Box #1
Baghouli	Adel	Box #6
Bahena	Lucio	Box #6
Baker	Teresa	Box #3
Balkunas	Vicki	Box #6
Banks	Michael	Box #4
Baranek	Katherine	Box #3
Baron	Todd	Box #6
Barr	James	Box #4
Barr	Gail	Box #1
Barrett	Loraine	Box #3
Barrill	London	Box #3
Beam	Stephen	Box #6
Beaudoin	Louis	Box #1
Beckett	Sam	Box #3
Benarroch	Alice	Box #1
Bend	John	Box #1
Benitez	Sixta	Box #3
Bennett	Thomas	Box #3
Benney	Tabitha	Box #3
Benoit	Mark	Box #1
Bernal	Ana	Box #6

TERMINATIONS

LAST NAME	FIRST NAME	
Bernhardt	Gretchen	Box #1
Berube	Michael	Box #4
Beswick	Allan	Box #6
Beverly	Tim	Box #4
Bezwiechin	Cham	Box #3
Blake	Howard	Box #3
Bloch	Michael	Box #3
Blyth	Alison	Box #6
Bobrowski	Michele	Box #3
Bocksch	Kristy	Box #4
Boehm	Erica	Box #3
Boettcher	Joe	Box #6
Bogert	Debra	Box #3
Boisvert	Cory	Box #1
Bonilla	Jose	Box #4
Bork	Allen	Box #4
Borrego	Sandra	Box #4
Borrell	Salvator	Box #1
Borrelli	Lisa	Box #6
Boudreau	Matthew	Box #4
Boukhalifa	Said	Box #6
Bouschet	Courtney	Box #4
Brass	Baysson	Box #1
Brassler	Chris	Box #1
Brendel	Kendra	Box #6
Brennan	Mary	Box #1
Briante	Gerard	Box #1
Bridger	Jody	Box #3
Briggs	Jacqueline	Box #1
Brown	Eleanor	Box #6
Brown	William	Box #6
Brummel	Denis	Box #3
Bryan	Amy	Box #1
Bryant	William	Box #4
Buckingham	Annette	Box #1
Buckley	Cynthia	Box #4
Budziak	Diane	Box #1
Burdett	Jill	Box #6
Burgess	Lawrence	Box #3
Burgon	Helya	Box #6
Burke	Maureen	Box #4
Burke	Christopher	Box #4
Burlew	Gary	Box #1
Burton	Myles	Box #3
Butler	Michael	Box #4
Calder	Malgorzata	Box #3
Caldwell	Karen	Box #1
Camacho	Darren	Box #4
Camilleri	Mark	Box #4

TERMINATIONS

LAST NAME	FIRST NAME	
Campbell	Benjamin	Box #3
Candella	Charles	Box #4
Cantrell	Dantelle	Box #4
Capozzi	Christina	Box #4
Carlisle	Kevin	Box #1
Carr	Janet	Box #3
Carroll	VALerie	Box #4
Carvalho	Deo	Box #3
Casher	Jeremy	Box #1
Castano	Ku	Box #4
Castillo	Sandra	Box #6
Castro	Juan	Box #4
Catranbone	Angela	Box #1
Cavinee	Krystal	Box #4
Celestin	Jean	Box #3
Chambers	Craig	Box #1
Chapuis	Rene	Box #1
Charles	Fresnel	Box #6
Charles	Sylfida	Box #6
Chillingsworth	Vanette	Box #6
Chioffe	James	Box #1
Christie	Michael	Box #4
Ciaffone	Cora	Box #6
Ciccica	John	Box #3
Clark	Kimberly	Box #1
Cleveland	Trisha	Box #6
Cloninger	Tana	Box #3
Coffman	Connie	Box #4
Cohen	Julius	Box #6
Cole	Joanne	Box #1
Collins	Yvette	Box #1
Collins	Barbara	Box #1
Conroy	James	Box #4
Cordero	Vera	Box #1
Cordero	Vero	Box #1
Cortes	Roberto	Box #3
Corti	Debra	Box #3
Coutts	Rachael	Box #1
Cox	Emory	Box #1
Cronin	Sonia	Box #6
Cross	Deborah	Box #6
Crostit	Barbara	Box #4
Crowley	Tricia	Box #6
Cruz	Lonjino	Box #6
Cruz	Israel	Box #6
Crystle	Joshua	Box #4
Cuervo	Anamaria	Box #4
Cummings	Meghan	Box #6
Curran	Maureen	Box #1

TERMINATIONS

LAST NAME	FIRST NAME	
Czerniak	Anthony	Box #4
Daley	Chad	Box #6
Damiano	Anthony	Box #4
Davis	Jeremy	Box #4
Davis	Eric	Box #1
Deak	Stephen	Box #6
Dean	Laurie	Box #6
Deleon	Elais	Box #4
Delia	Frank	Box #4
Dellay	Scott	Box #1
DeLorenzo	Mark	Box #6
DeNarvaez	Claudia	Box #3
DePaula	Danielle	Box #4
DeRiso	Gina	Box #1
DeSernia	Sulamita	Box #3
Devine	Keith	Box #1
DeVito	Dawn	Box #1
DiBenedetto	Melissa	Box #3
Dickens	George	Box #6
Dieu Donne	Jean Charles	Box #4
Dimitrova	Violeta	Box #3
Dodge	Virginia	Box #1
Dombayci	Yimaz	Box #6
Domnick	Mark	Box #1
Donnelly	Jennie	Box #3
Dorsa	Antonio	Box #1
Drake	Charlie	Box #6
Drogowski	David	Box #6
Dubois	Lydia	Box #4
Dubois	Crystal	Box #6
Dumstra	Adam	Box #6
Eaton	Adam	Box #4
Edge	Jerod	Box #4
Edwards	Don	Box #4
Egger	Paul	Box #6
Elkhoury	Toni	Box #6
Ellingworth	David	Box #6
Ellis	Christine	Box #1
Elwell	Douglas	Box #1
Enger	Mark	Box #3
English	Mistie	Box #3
Espinoza	Francisca	Box #4
Espinoza	Henner	Box #3
Espinoza	Carlos	Box #6
Estime	Karl	Box #1
Ettehad	Shahla	Box #4
Faaland	Roy	Box #1
Faba	Juan	Box #1
Fagen	Lanell	Box #1

TERMINATIONS

LAST NAME	FIRST NAME	
Faraci	Franklin	Box #1
Fasel	Jeremy	Box #4
Faulk	Joel	Box #1
Feal	Jose	Box #4
Feick	Gretchen	Box #4
Fein	Lawrence	Box #1
Fernandez	Jose	Box #6
Ferree	Tonya	Box #3
Fesser	Michael	Box #1
Fidanovic	Novak	Box #6
Figueroa	Irina	Box #3
Filippone	Vittorio	Box #4
Finch	Michael	Box #1
Finckenor	George	Box #4
Fink	Roger	Box #4
Fiorentino	Maria	Box #4
Firat	Turabi	Box #1
Fischbach	Nora	Box #3
Fischer	Rosemary	Box #4
Fiumara	Michele	Box #3
Flores	Pedro	Box #3
Folmer	Ronald	Box #1
Foss	John	Box #1
Fox	Lisa	Box #6
Francoeur	Mary Lou	Box #6
Fratus	Donna	Box #3
Frelich	Jason	Box #6
Frey	Kenneth	Box #4
Friday	Jennifer	Box #6
Frith	Cynthia	Box #1
Fritz	John	Box #1
Frost	Mark	Box #1
Gacon	Allan	Box #1
Galla	Galla	Box #1
Galloway	Kurt	Box #6
Galloza	Sergio	Box #3
Garcia	Souad	Box #6
Garcia-Douglas	Marcia	Box #6
Garrido	Dante	Box #4
Gedeum	Rosalie	Box #3
Gell	William	Box #3
Gervais	Marie	Box #6
Getgood	Russell	Box #1
Gibeault	Larry	Box #1
Gillie	Barbara	Box #1
Gividen	Nathan	Box #1
Glass	Kevin	Box #1
Goicochea	Darcy	Box #6
Goldrich	Amanda	Box #3

TERMINATIONS

LAST NAME	FIRST NAME	
Golemis	Sam	Box #3
Gomaa	Ashraff	Box #6
Gonzales	Augustine	Box #4
Gonzales	Dora	Box #4
Gonzalez	Raul	Box #3
Gonzalez	David	Box #1
Gonzalez	Elsa	Box #1
Gonzalez	Alex	Box #6
Goodman	William	Box #4
Goupy	Bernad	Box #6
Gowdy	Charles	Box #1
Granjales	Myriam	Box #6
Grant	Everton	Box #4
Grasso	William	Box #3
Graves	Erika	Box #4
Green	Michelle	Box #1
Greene	James	Box #1
Greenwood	Elizabeth	Box #1
Gregson	Scott	Box #3
Grieve	Daniel	Box #3
Griffin	Mark	Box #1
Griffin	Michael	Box #1
Griffiths	Sandra	Box #1
Griggs	Dora	Box #3
Grosso	Peter	Box #1
Guerin	Jean	Box #1
Gutierrez	Mauricio	Box #1
Gutierrez	Porfidio	Box #1
Gutierrez	Antonio	Box #3
Guyierrez	Warren	Box #6
Hader	Karen	Box #3
Hagen	Kyla	Box #1
Haggar	Karen	Box #3
Hamby	Michael	Box #1
Harris	Dan	Box #6
Hartsough	Cheryl	Box #1
Hatch	Wendy	Box #1
Hatfield	Michael	Box #1
Havican	Robert	Box #6
Heanssler	Pete	Box #3
Hefel	Eric	Box #6
Hemings	Romy	Box #6
Hennessee	Jason	Box #3
Hernandez	Gladys	Box #3
Hernandez	Alexander	Box #3
Hernandez	Luis	Box #3
Herrara	Julio	Box #4
Herth	Francesca	Box #3
Higgins	Jennifer	Box #4

TERMINATIONS

LAST NAME	FIRST NAME	
Higgs	Kathleen	Box #1
Hill	Donna	Box #4
Hill	Samuel	Box #1
Hinkin	Cynthia	Box #3
Ho	Stella	Box #1
Hochong	Anthony	Box #6
Hodes	Robin	Box #4
Holcomb	Mary	Box #3
Holryid	Mary	Box #1
Homenuik	Wilfred	Box #6
Hong	David	Box #6
Hopkins	Victoria	Box #6
Horsky	George	Box #3
Hossain	Mohammed	Box #1
Hoyle	Patricia	Box #4
Huber	Frank	Box #4
Huguet	Roberto	Box #3
Hulsey	Thomas	Box #4
Hutchins	Marguerite	Box #4
Hyde	Rose	Box #6
Hylton	Longsworth	Box #6
Ibrahim	Ashraf	Box #4
Infante	Carlos	Box #4
Insani	Mark	Box #3
Ioli	Gina	Box #4
Irvine	Marche	Box #3
Jacob	Maureen	Box #1
Jacobs	Rick	Box #1
Jacques	Dudley	Box #1
Jacques	Nixon	Box #6
Jaferali	Errol	Box #4
James	Buddy	Box #6
Jankowski	Keith	Box #1
Jaramillo	Olmes	Box #1
Jean	Jacques	Box #6
Jenkins	Todd	Box #4
Jespersion	Henrik	Box #3
Johnansen	Elise	Box #6
Johnson	Eric	Box #4
Johnson	Josh	Box #4
Johnson	Chad	Box #1
Johnson	Debbie	Box #1
Johnson	Laura	Box #1
Johnson	Jade	Box #1
Johnson	Walter	Box #1
Johnson	Cathiejo	Box #6
Jones	Steve	Box #4
Jones	Regina	Box #3
Joseph	Elisca	Box #6

TERMINATIONS

LAST NAME	FIRST NAME	
Juan	Miguel Tomas	Box #4
Juan	Angelina	Box #6
Kaiser	Stephen	Box #4
Kalson	Vince	Box #1
Kapreilian	Peter	Box #4
Karius	Michael	Box #4
Kaufman	Robert	Box #1
Keady	Mike	Box #1
Keiser	Lisa	Box #4
Keller	Mikchael	Box #4
Kelley	Nancy	Box #1
Kelly	Lois	Box #4
Kelly	John	Box #1
Kennedy	Sean	Box #3
Kenney	Marlou	Box #3
Kenny	Brian	Box #4
Kent	Scott	Box #4
Kincl	Joseph	Box #4
King	Helen	Box #4
King	Jeffrey	Box #3
King	Michael	Box #6
Kirby	Brian	Box #1
Kleinfeld	Robert	Box #1
Kline	Eileen	Box #6
Kole	Karen	Box #4
Kowalski	Susan	Box #1
Kresic	Blago	Box #1
Krogman	Terry	Box #1
Krpina-Zito	Marija	Box #4
Kruppenbacher	Michael	Box #6
Kuiper	Gary	Box #3
Kuntz	Carlson	Box #4
LaCerte	Troy	Box #1
Laidlaw	Kenneth	Box #3
Laine	Brent	Box #6
Laing	Melissa	Box #6
Lang	Eric	Box #4
Langford	Chad	Box #6
Langweiler	Albert	Box #1
Lanunziata	Stacia	Box #6
Laskaris	Alexandra	Box #1
Laufenberg	Lynette	Box #1
Lawlor	Thomas	Box #3
Lefrancois	Aaron	Box #3
Leite	Paulo	Box #1
Leitzell	jTara	Box #4
Leone	Nick	Box #1
Leonova	Victoria	Box #6
LeRoux	Marthinus	Box #6

TERMINATIONS

LAST NAME	FIRST NAME	
Lester	Carolina	Box #6
Lewis	Corey	Box #1
Leyden	Gene	Box #6
Liberte	Monney	Box #3
Lightbourne	Andrianne	Box #1
Lisec	Lisa	Box #1
Locke	Michelle	Box #3
Logalbo	Franklin	Box #6
Lopez	Claudio	Box #4
Lopez	Julian	Box #3
Lopez	Marvin	Box #3
Lopez	Mario	Box #6
Lopez	Roger	Box #6
Love	Rena	Box #3
Lowe	Karl	Box #3
Lugo	Christianne	Box #3
Lusse	Robert	Box #1
Luxton	Stephanie	Box #4
Lyle	Mary Jane	Box #6
Lynam	Robert	Box #6
Lynch	Cheri	Box #3
MacDonnell	Thomas	Box #7
Machado	Carlos	Box #4
Magerus	Georges	Box #4
Malay	Maya	Box #3
Maldonado	Juvencio	Box #1
Maldonaldo	James	Box #7
Mann	Andrew	Box #3
Mannion	Deidre	Box #4
Marcenaro	Eduardo	Box #1
Marchman	Henry	Box #4
Marino	Mindy	Box #1
Marrone	Kimberly	Box #3
Marshall	John	Box #7
Martinez	Steve	Box #1
Martinez	Zach	Box #7
Martinez	Hector	Box #7
Massias	Caroline	Box #4
Mateo	Alfredo Lucas	Box #1
Maurice	Marie	Box #3
Max	Susan	Box #1
Maxwell	Terence	Box #7
McAlees	Brook	Box #4
McBrayer	Cassandra	Box #1
McCabe	Kevin	Box #3
McCambridge	Angela	Box #1
McCann	Kevin	Box #3
McCarthy	Shannon	Box #3
McConnell	James	Box #4

TERMINATIONS

LAST NAME	FIRST NAME	
McCormick	Jennifer	Box #7
McDaniel	Elizabeth	Box #4
McDonald	Amanda	Box #3
McDonald	Deborah	Box #1
McFarland	Robert	Box #4
McGreevy	Barbara	Box #1
McKee	Wende	Box #4
McKeen	Nohora	Box #3
McKim	Mark	Box #1
McLean	Stephen	Box #4
McMahon	Leo	Box #7
McMiled	Patricia	Box #3
McNaughton	Sean	Box #7
McNicholas	Marie	Box #3
Mead	Paul	Box #7
Meade	Raymond	Box #1
Mena	Arturo	Box #1
Merchant	Kenneth	Box #4
Merriman	Rita	Box #7
Mesa	Uenoi	Box #3
Messemer	Brian	Box #4
Metayer	Edenes	Box #4
Metayer	Marie	Box #1
Michaels	Jesse	Box #7
Michel	Bernadette	Box #7
Miller	Eric	Box #3
Miller	Lisa	Box #3
Miller	Ronald	Box #7
Milosevic	Sas	Box #1
Miranda	Cari	Box #7
Mitchell	Edward	Box #4
Mohamed	Waleid	Box #4
Monaco	Lettia	Box #1
Monia	Gregory	Box #1
Monson	Jill	Box #7
Montano	Helmuth	Box #4
Montano	Henry	Box #4
Montecinos	James	Box #4
Moore	Joel	Box #2
Moran	Tom	Box #7
Moree	Darlene	Box #4
Moreno	Aura	Box #3
Morgan	Todd	Box #2
Morgan	Jennifer	Box #7
Morris	Katherine	Box #3
Morris	Rebecca	Box #7
Mosher	Neil	Box #2
Moss	William Coury	Box #4
Mullen	Sony	Box #7

TERMINATIONS

LAST NAME	FIRST NAME	
Mullen	Cheryl	Box #7
Munford	Cheryl	Box #7
Munoz	Mariadelrocio	Box #4
Musallet	Hassan	Box #2
Musso	Diane	Box #7
Myers	Louisa	Box #3
Myers	Linda	Box #7
Nagy	Matthew	Box #4
Nagy	Viktoria	Box #7
Nakoneczny	Dawn	Box #4
Narleski	Linda	Box #2
Nasie	Waleed	Box #7
Natal	Luis	Box #3
Neira	Fernando	Box #3
Nelsen	Holly	Box #2
Nelson	Lisa	Box #3
Nemets	Tammie	Box #3
Nieporte	Joseph	Box #4
Noe	Thomas	Box #7
Noel	Marie	Box #7
Nolan	Susan	Box #2
Northern	Brad	Box #7
Noufal	Michel	Box #2
O'Boyle	Thomas	Box #7
Oconnor	Kevin	Box #2
Oesterling	Emily	Box #7
Oldfield	Janice	Box #2
Oliver	Meike	Box #4
O'Neill	Kathryn	Box #2
O'Neill	William	Box #2
O'Neill	Joseph	Box #7
Orozco	Clemente	Box #3
Pagen	Mitchel	Box #2
Pagliaro	Peter	Box #4
Palomba	Amanda	Box #2
Parker	Sandra	Box #3
Parker	Everett	Box #2
Parkinson	Nicole	Box #4
Pavelka	Nathan	Box #2
Pavonni	Michelle	Box #2
Pedro	David	Box #4
Peison	Brenda	Box #7
Pelaez	Juan	Box #2
Penate	Alexander	Box #4
Perez	Marlow	Box #4
Perkins	Tian	Box #4
Perrey	Arielle	Box #2
Pesasico	Crispin	Box #4
Petery	Pamela	Box #7

TERMINATIONS

LAST NAME	FIRST NAME	
Petrillo	Camille	Box #3
Pharr	Stephanie	Box #4
Philips	Ralph	Box #3
Pickens	Robert	Box #2
Pientka	John	Box #2
Pierre-Noel	Yvonne	Box #4
Pinder	Patricia	Box #7
Pine	Jon	Box #3
Pino	Alex	Box #7
Pinto	Julie	Box #2
Piques	Christian	Box #7
Pisani	Craig	Box #2
Pisani	Nicholas	Box #2
Pitot	Patrick	Box #3
Pittinger	Mark	Box #4
Pitts	Jeremiah	Box #2
Plaine	Victoria	Box #3
Ponder	Janet	Box #3
Poston	Roberta	Box #4
Powell	Nicole	Box #3
Powell	Kelley	Box #7
Presto	Nicholas	Box #4
Price	Robin	Box #2
Prouty	Joy	Box #2
Prucien	Mona	Box #3
Quigley	Christy	Box #7
Quirao	Maria	Box #4
Rafrano	Dawn	Box #2
Ragland	Leslie	Box #2
Ramirez	Roxana	Box #2
Ramos	Milka	Box #3
Raphael-Dallas	Jamie	Box #3
Reardon	Lisa	Box #2
Reasinger	Amy	Box #2
Redmond	Suzanne	Box #2
Reed	Diana	Box #4
Reich	Gwendalyn	Box #2
Reil	Richard	Box #2
Reis	Brian	Box #7
Reis	Charles	Box #7
Reiser	Scott	Box #7
Rene	Josette	Box #4
Rene	Jean	Box #7
Rene	Lamercie	Box #7
Rennie	Kerry	Box #2
Reyes	Randolfo	Box #4
Reynolds	Janice	Box #7
Ribeiro	Gregg	Box #3
Richardson	Brian	Box #7

TERMINATIONS

LAST NAME	FIRST NAME	
Rinker	Ross	Box #7
Rivera	Pablo	Box #3
Rivera	Eduardo	Box #2
Rivero	Alicia	Box #7
Robbins	Jody	Box #4
Roberts	Virginia	Box #4
Roberts	Walter	Box #4
Roberts	Diane	Box #3
Robsham	Lydie	Box #7
Rodriguez	Francisco	Box #4
Rodriguez	Abel	Box #3
Rodriguez	Kenia	Box #3
Rodriguez	Aristalia	Box #2
Rogers	Howard	Box #2
Romeus	Melege	Box #2
Rony	Jean	Box #2
Roqueta	Maria	Box #2
Rose	Cheryl	Box #2
Rosenberg	Bradley	Box #2
Rosier	Sandra	Box #2
Rotchford	Bernadette	Box #4
Rubio	Pascual	Box #2
Rueda	Maria	Box #4
Ruiz	Juan	Box #2
Russeau	Heidi	Box #4
Russell	Kathryn	Box #4
Russotto	Vincent	Box #7
Ryan	Megan	Box #2
Ryan	Michael	Box #7
Saint Gerard	Manes	Box #7
Saint Surin	Jacquest	Box #2
Salloum	Adib	Box #2
Salman	David	Box #2
Salvador	Marian	Box #2
Sanford	Kevin	Box #5
Santos	Elimos	Box #2
Sasaki	Shoko	Box #7
Saunders	Sarah	Box #2
Savage	Angelia	Box #5
Savoie	Terry	Box #2
Scanlan	Peter	Box #5
Schlechter	Melissa	Box #5
Schmantowsky	Craig	Box #2
Schoonover	Richard	Box #2
Schroeder	Glenn	Box #5
Schumacher	Patricia	Box #2
Schwab	Emily	Box #2
Scotland	Jaycen	Box #7
Scott	Cecelia	Box #2

TERMINATIONS

LAST NAME	FIRST NAME	
Seebauer	Gina	Box #7
Seesholtz	Joseph	Box #2
Sellas	William	Box #2
Serpico	Joseph	Box #2
Sevilla	Carlos	Box #5
Shaw	Tammy	Box #7
Shelhamer	Sage	Box #7
Shepherd	Michael	Box #7
Shields	Catherine	Box #2
Shumate	Regis	Box #5
Shumpis	David	Box #7
Similien	Raymond	Box #2
Simms	Amanda	Box #7
Simpson	Robert	Box #7
Sineni	Sandra	Box #2
Singerline	Thomas	Box #2
Skinner	Troy	Box #2
Sluzenski	Jonathan	Box #7
Smith	Jeremiah	Box #5
Smith	Ivan	Box #5
Smith	Meadow	Box #2
Smith	Debbie	Box #2
Smith	Elizabeth	Box #2
Smith	Fred	Box #2
Snyder	Lisa	Box #7
Soler	Luis	Box #2
Soliman	Alex	Box #2
Sosa	Anian	Box #7
Southall	Ginger	Box #2
Souza	Robert	Box #2
Spencer	Sxott	Box #2
Sprague	Steven	Box #2
Springer	Timothy	Box #2
Stanfield	Todd	Box #5
Staniszewski	Casey	Box #7
Stankunas	Jolanta	Box #7
Stanley	Lisa	Box #2
Sta-Rosa	Jaime Lindo	Box #2
Steinberg	Kathleen	Box #2
Steinhaus	Cynthia	Box #2
Steliga	Stephanie	Box #5
Stenger	Stuart	Box #2
Stephans	Dorian	Box #2
Stewart	Selvin	Box #2
Strohmingner	Matthew	Box #2
Stuart	Susan	Box #2
Stuhr	Kenneth	Box #2
Sturtevant	Charles	Box #5
Sucur	Nicholas	Box #7

TERMINATIONS

LAST NAME	FIRST NAME	
Sullivan	Judith	Box #2
Sumpter	Drew	Box #2
Swan	Pyson	Box #5
Sweeney	Bridget	Box #5
Swiderski	Richard	Box #2
Swiderski	Mark	Box #2
Sylne	Romel	Box #2
Tan	Priscilia	Box #2
Tarantino	Vincenzo	Box #2
Tatum	Christopher	Box #7
Taylor	Kevin	Box #5
Tempfli	Glenn	Box #2
Thelemaque	Jierre	Box #5
Thibeault	William	Box #7
Thiel	Kurt	Box #2
Thiel	Ryan	Box #2
Thomas	Edward	Box #2
Thompson	Derek	Box #2
Thompson	Christine	Box #2
Tomer	Mary	Box #2
Tonge	Al	Box #5
Torres	Frank	Box #5
Torres	Iris	Box #7
Toussant	Elby	Box #7
Trevino	Danielle	Box #2
Tsitsirides	Alex	Box #5
Tucker	Marie	Box #7
Uljić	Gjon	Box #2
Umpierre	Frances	Box #7
Valdez	Bridges	Box #2
Valdez	Julie	Box #2
Valenti	Paul	Box #2
Vandersloot	Mildred	Box #5
VanVliet	Jane	Box #2

TERMINATIONS

LAST NAME	FIRST NAME	
Vasquez	Sosmar	Box #5
Vasquez	Christian	Box #2
Vaughn	Matthew	Box #2
Velasquez	Rodolfo	Box #2
Vidalis	Chantal	Box #2
Voluck	Justin	Box #2
Vyskrebentsev	Aleksey	Box #5
Wahl	Steven	Box #5
Walker	Sylvia	Box #7
Walkowiak	Toni	Box #7
Wallace	Philip	Box #2
Ward	Terry	Box #5
Webb	Jacob	Box #7
Weber	Ronald	Box #2
Weidner	James	Box #7
Weisman	Brian	Box #2
Wentworth	Gayle	Box #2
Weslowski	Elaine	Box #2
White	Scott	Box #5
Whitley	Deborah	Box #7
Whitney	Moriah	Box #7
Whittle	Tamara	Box #2
Wilburn	Jennifer	Box #2
Williams	Arhon	Box #2
Williams	Gretchen	Box #2
Williams	Jacqueline	Box #2
Williams	Ellen	Box #7
Williams	Kristin	Box #7
Willoughby	William	Box #2
Willson	Howard	Box #5
Willson	Joseph	Box #2
Woolf	Elena	Box #2
Wynn	Beverly	Box #2
Yancey	Kathryn	Box #2
Yancey	Scott	Box #7
Yeskey	Dean Martin	Box #5
Young	Todd	Box #2
Zervoulis	Matthew	Box #2
Zivkovic	Milo	Box #2
Zorn	Christopher	Box #7
Zwick	Danielle	Box #2

Box #1 1998 terms
 Box #2 1998 & 1999 terms
 Box #3 1999 terms
 Box #4 2000 terms
 Box #5 2000 terms
 Box #6 2001 terms

TERMINATIONS

LAST NAME	FIRST NAME
Box #7	2001 terms

EXHIBIT T

UNITED STATES DISTRICT COURT
for the
Southern District of New York

Civil Action No. 15-cv-07433-RWS

VIRGINIA GIUFFRE,

Plaintiff,

vs.

GHISLAINE MAXWELL,

Defendant.

VIDEO-DEPOSITION Sky Roberts
OF:

TAKEN BY: Defendant

REPORTED BY: Karla Layfield, RMR
Stenographic Court Reporter
Notary Public
State of Florida at Large

DATE AND TIME: May 20, 2016; 8:33 a.m.

PLACE: Millhorn Law Firm
11294 North US Highway 301
Oxford, Florida

APPEARANCES: Laura A. Menninger, Esquire
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Denver, Colorado 80203
Attorney for Defendant

Brad Edwards, Esquire
Farmer, Jaffe, Weissing, Edwards,
FISTOS & LEHRMAN, PL
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Fort Lauderdale, Florida 33301
Attorney for Plaintiff

ALSO PRESENT: Kenneth Sarcony, Videographer

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Sky Roberts

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(Exhibits attached.)

1 Q Do you remember there being a job posting that
2 you felt like was appropriate for Virginia or did you just
3 go out and talk to the woman who ran the spa area on your
4 own?

5 A I just talked to Angela.

6 Q Okay. Do you recall whether this was intended
7 to be a full-time job?

8 A I don't remember if it was full time or just
9 summer jobs or, you know, during season. It was probably
10 for a season because Mar-a-Lago is seasonal.

11 I mean, I was there year round but a lot of
12 people are seasonal, you know, because it's like
13 snowbirds, you know, summertime comes and nobody wants to
14 be down in south Florida.

15 Q What would you call the season, the seasonal
16 aspect of Mar-a-Lago? What's the season?

17 A Probably from September or October to, you know,
18 maybe May, I guess.

19 Q Is that the coolest time?

20 A Times of the year, yes.

21 Q And it's more guests that come during that
22 period of time?

23 A Yes.

24 Q And is there more staff brought on during that
25 period of time?

1 A Yes.

2 Q You saw that happen every year that you were
3 there?

4 A Every year.

5 Q And in the summer, it's relatively dead because
6 it's so hot?

7 A Basically, it closed during the summer. That's
8 when we would kind of work on everything and then make
9 sure everything is up to snuff for the next year, you
10 know.

11 Q Do you remember what capacity Virginia was hired
12 to work in, what her job title was, for example?

13 A I don't know. I would have lunch with Virginia.
14 That's about as much as I know about what she did. I was
15 busy all the time.

16 Q I understand.

17 A I didn't have time to go see what she was doing.
18 I didn't really talk to Angela about what she had to do.
19 I think that was her name, Angela. But it's kind of the
20 name that sticks out.

21 Q We'll just use Angela.

22 A We'll use that as the name.

23 Q But we know it may not be Angela.

24 A It may not be.

25 Q Just because we have to call her something,

1 A Where did I learn that?

2 Q Uh-huh.

3 A I think Virginia had told me that there was a
4 lady in the spa area named Ms. Maxwell. I don't know her.
5 I couldn't tell you what she looked like.

6 But just she said Ms. Maxwell said she can get
7 me a job with Jeffrey Epstein who is a friend of Donald
8 Trump, so I figured, well, he was a good guy or whatever,
9 you know, and that she was going to learn massage therapy.

10 Q When did Virginia tell you this?

11 A Oh, I can't tell you what date and time but I
12 don't remember.

13 Q I understand.

14 Did she tell you this while she was working at
15 Mar-a-Lago?

16 A Yes. I mean, after she had been there for a
17 little bit, you know, and then she told me, yes, that she
18 could possibly get this other job.

19 Q Okay.

20 A You know.

21 Q So she worked at Mar-a-Lago for a few months?

22 MR. EDWARDS: Form.

23 THE WITNESS: I have no idea. I don't know
24 how long she worked there. I don't remember.

25 BY MS. MENNINGER:

1 A Uh-huh. Yes. It's not to me. It's up to her.
2 I think that's the way I told her, you know.

3 Q Did you ever meet Jeffrey Epstein?

4 A Once.

5 Q When was that?

6 A I dropped Virginia off at the house once and he
7 came out and I met him and seemed just fine to me. I
8 mean, you can't tell people by looking at them.

9 I mean, I know now from, you know, what I've
10 read that he's not a good guy. But you can't tell. You
11 know, you don't even know your neighbors sometimes, you
12 know.

13 Q Do you remember about when you dropped Virginia
14 off at his house that you met him?

15 A What do you mean?

16 Q Was it about the same time Virginia started
17 working with him?

18 A Yeah.

19 Q Was it later?

20 A I think it was about the time she started.
21 Because I wanted to see where she was at, you know. And
22 it was just a mansion down the street from, you know,
23 Mar-a-Lago. So I didn't think twice about it. I didn't
24 think nothing of it. He came out. He was very cordial,
25 very nice.

1 Q Do you remember any part of your conversation
2 with him?

3 A No. It was just that, you know how a parent has
4 to meet -- you know, if my daughter is going to work
5 somewhere, I just want to meet the guy and see what was
6 going on, you know. But I don't remember any
7 conversation, you know.

8 I just remember meeting him and that was it and
9 she walked into the house and --

10 Q All right. So you recall Mr. Epstein coming
11 outside of his home and greeting you?

12 A Yes.

13 Q Were you invited into his home?

14 A No.

15 Q Did you ever go inside of his home?

16 A No.

17 Q Other than that one time you dropped her off
18 there, do you ever remember going to that home?

19 A No. I couldn't tell you where it was at.

20 Q Okay. Did you meet anyone else while you were
21 there at the home?

22 A No.

23 Q Did you have a conversation with anyone else?

24 A No.

25 Q Did you every call Virginia at that home?

1 message therapy.

2 Q All right. When she came home at night from
3 working with Mr. Epstein, did she look distressed to you
4 in any way?

5 A Not that I remember.

6 Q Okay. Did she report any complaints about her
7 job with Mr. Epstein?

8 A Not to me.

9 Q Okay. Did she report them to anyone else who
10 then reported them to you?

11 A No.

12 Q Your wife, for example?

13 A I have no idea. Like I said, if she did tell my
14 wife, I never heard about it.

15 Q Okay. Have you ever met Ms. Maxwell?

16 A Not that I remember ever meeting her.

17 Q Do you know what she looks like?

18 A No.

19 Q Did you ever meet anyone else who worked with
20 Mr. Epstein?

21 A No.

22 Q Do you remember anyone else who worked for
23 Mr. Epstein bringing your daughter home, for example?

24 A No.

25 Q Did your daughter ever move into the home where

C E R T I F I C A T E

STATE OF FLORIDA

COUNTY OF MARION

I, Karla Layfield, RMR, Stenographic Court Reporter, do hereby certify that I was authorized to and did stenographically report the foregoing deposition of Sky Roberts; that said witness was duly sworn to testify truthfully; and that the foregoing pages, numbered 1 through 142, inclusive, constitute a true and correct record of the testimony given by said witness to the best of my ability.

I FURTHER CERTIFY that I am not a relative or employee or attorney or counsel of any of the parties hereto, nor a relative or employee of such attorney or counsel, nor am I financially interested in the action.

WITNESS MY HAND this day of May, 2016, at
Ocala, Marion County, Florida.

Karla Layfield, RMR
Stenographic Court Reporter

1 CERTIFICATE OF OATH

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, the undersigned authority, certify that Sky
5 Roberts personally appeared before me and was duly sworn
6 on the 20th day of May 2016.

7 WITNESS MY HAND AND OFFICIAL SEAL this day
8 of May 2016.

9
10
11 Karla Layfield, RMR
12 Notary Public
13 State of Florida at Large
14 My Commission No. FF942806
15 My Commission Expires 12/10/2019

16 Personally Known
17 Professionally Known
18 Produced Identification of FDL
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EXHIBIT U

**THE MAR-A-LAGO CLUB, L.C.
EMPLOYMENT POLICIES
OCTOBER 28, 1995**

ain
EXHIBIT **19**
Giuffre
AGREN BLANDO REPORTING
11-74-76

MAR-A-LAGO 0178

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INTRODUCTION

The Mar-A-Lago Club, L.C. ("the Club") seeks to provide the quality of work which will develop the potential of each employee as well as the Club as a whole. In this regard, this policy and procedures manual is designed to acquaint each employee with the administrative and personnel practices of the Club. These guidelines provide a framework for the fair and equitable treatment of all employees regardless of location, department, manager or supervisor. Each employee should be familiar with the responsibilities and opportunities available to make work as rewarding as possible.

These policies and procedures should be read carefully and clearly understood. Each department head, manager or supervisor will be able to answer, or obtain an answer, to any questions involving interpretation or clarification of these policies and procedures. Each employee is expected to apply these general policy and procedure guidelines conscientiously in a constructive and supportive manner.

The policies in this manual are only guidelines and the Club reserves the right to add to, subtract from, or change these provisions in any way, at any time, without being bound to the previously replaced or revised provisions. This handbook is not to be construed as an employment agreement or employment contract and the Club is under no obligation to provide the benefits set forth in this manual if it determines, at a subsequent time, that these benefits are to terminate.

EQUAL EMPLOYMENT OPPORTUNITY

The Club is an equal opportunity employer which is committed to prohibiting discrimination on the basis of race, color, sex, age, religion, national origin, sexual orientation, marital status, or disability throughout the employment process, from selection through termination.

The Club intends to provide a pleasant work environment that is healthful and comfortable and will not tolerate any form of employee harassment, either verbal, written, physical, or visual, based on race, color, religion, sex, national origin, age, disability or marital status.

Harassment can take many forms. It may be, but is not limited to: words, signs, jokes, pranks, intimidation, physical contact, violence toward any employee by a fellow employee, a supervisor, or a person doing business with the Club. Harassment is not necessarily sexual in nature.

All necessary steps will be taken to comply with existing federal, state and local fair employment laws and guidelines.

ORIENTATION POLICY

The first ninety days of employment are considered to be an orientation or probationary period during which you and the Club have an opportunity to know each other. Your performance will be evaluated during this time to assess your potential for continued employment. Evaluations will continue as long as you are employed, but during the orientation period your supervisor may observe and evaluate your performance more closely and more frequently to ensure that you are learning your job. During this orientation period, employees may earn but may not use vacation or personal days, except with permission of the Club Manager's office. If the employment relationship is terminated during this ninety day period, you shall not be entitled to receive any payment for benefits, e.g., personal days, vacation days, or unemployment compensation.

SEXUAL HARASSMENT

The Club strictly prohibits any form of harassment in the workplace, including sexual harassment.

Definition of Sexual Harassment:

1. Unwelcome sexual advances, requests for sexual favors, and other such verbal or physical conduct constitute sexual harassment under the following conditions:
 - A. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
 - B. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual.
 - C. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.
2. Conduct which falls into the definition of sexual harassment may include, but is not limited to:
 - A. Unwelcome physical contact of a sexual nature such as patting, pinching or unnecessary touching.
 - B. Overt or implied threats against an individual to induce him or her to perform sexual favors or to engage in an unwelcome sexual relationship.
 - C. Verbal harassment or abuse of a sexual nature, including intimating by way of suggestion a desire for sexual relations or making jokes or remarks of a sexual nature to or in front of a person who finds them offensive.
 - D. Use of sexually suggestive terms or gestures to describe a person's body, clothing, or sexual activities.
 - E. Displaying or posting offensive sexually suggestive pictures or materials in the workplace.

Recourse:

3. If an employee feels that an incident of any form of harassment has occurred, the employee is encouraged to report the matter to the Club Manager's office. All such issues will be handled in strict confidence to the extent possible with minimum embarrassment to the involved parties. As in any grievance procedure, the facts of the situation will be reviewed objectively so that appropriate disciplinary action, including discharge, can be taken if misconduct has occurred.

A timely resolution of each complaint is to be reached and communicated to the parties involved. Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited.

In the event an employee files a frivolous, malicious or false claim, appropriate sanctions for discipline of the complainant, including termination, may result.

CARE OF FACILITIES

The Club has made a large investment in equipment and facilities to provide each employee with the necessary resources to accomplish his/her duties.

It is the responsibility of management and each employee to treat equipment and facilities with respect and care. Neatness and cleanliness are required to maintain these resources at a level at which the employee can and will be proud. Abuse of equipment and facilities will not be tolerated and may lead to disciplinary action including discharge.

ENTRY AND EXIT OF CLUB GROUNDS/PREMISES

All employees must enter and leave the Club at the Southern Boulevard gates unless otherwise directed by management.

Employees may not enter the Club grounds/premises more than 30 minutes before the start of their scheduled shift, and employees must exit the Club grounds/premises directly after their shift ends, unless authorized by your department head.

When conducting Club business off the premises of Mar-a-Lago, you must have approval of your department head or supervisor.

Employees may not patronize the Club facilities without prior written approval of their department head.

If an employee needs to return to the property for any reason, the employee must contact their supervisor or a department head prior to their arrival. Security must be contacted in the event no supervisor is available.

PROOF OF AUTHORIZATION TO WORK

You must comply with government regulations by furnishing valid documentation of both your identity and your authorization to work. The Club Manager will advise you what documents are acceptable. If your immigration or work authorization status changes after you begin work so that you are no longer able to continue to work in the United States, you must advise your supervisor and the Human Resources Manager.

SECURITY

A. INFORMATION -

All financial, contract, production, and administrative records and information of the Club and its members are confidential. Each employee is responsible for making certain that information under his/her control is appropriately safeguarded. An employee will not provide or disclose office or guest information to third parties unless it has been determined that the party has a legitimate right to know and the request has been approved by your Supervisor.

Authorization by the Managing Director must be obtained before written contact is made of any member, client, purveyor, (current or prospective).

Any uncertainties should be cleared with the Managing Director before such information is provided.

B. CONFIDENTIALITY -

No employee shall, during the term of his/her employment or thereafter disclose to others or use, except as authorized by the Managing Director, any of the Club's confidential, technical, or other business information. "Confidential, technical or other business information" shall mean any information, including lists of the Club's vendors and customers, which the employee has used, learned or contributed during the course of his/her employment, regardless of whether it was written or in other tangible form that (i) is not generally available to the public; or (ii) gives one who uses it a competitive advantage over the Club.

C. FACILITIES -

Access to Club facilities will be limited to parties with a legitimate reason to be there. Employees are not permitted to have visitors on the premises unless special arrangements have been made by the employee's supervisor. Outside visitors will be greeted by Post One and escorted to their area of business. Each employee should feel comfortable in politely confronting an unknown individual who appears suspicious or in need of direction.

An essential element of the security procedures of the Mar-a-Lago Club is the key control process. As such, employees who have access to Club keys must recognize the importance of properly safeguarding the keys which have been entrusted to them. All employees should be aware that they may be subject to disciplinary action for any violation of the key control procedures. Guest room keys must never be left in your locker.

In the event of a breach or threatened breach by the employee of provisions A, B or C of this section, the Club shall be entitled to an injunction restraining the employee from disclosing or using, in whole or in part, such information or from rendering any services to any person, Club, corporation, association, or other entity to whom such information, in whole or in part, has been disclosed or is threatened to be disclosed. Nothing herein shall be construed as prohibiting the Club from pursuing other remedies available to the Club for such breach or threatened breach, including the recovery of damages from the Club.

D. GUEST PRIVACY -

Everyone enjoys privacy. Employees are prohibited from revealing any personal or business information about a Club member.

Do not divulge names or room numbers of one guest to another. Do not let a person into any guest room without verifying with the front desk that the person is the guest registered to that room.

All guest floors and areas are off limits to employees unless they are specifically assigned to perform work duties in these areas.

Employees are not allowed to accept invitations from guests to join them in their room. At no time is an employee to ask a member for an autograph or to ask a member to socialize with them off duty.

E. UNAUTHORIZED AREAS -

Employees may not enter areas of the building, especially guest floors, unless they have been assigned by a supervisor. Example:

Building Employees require work orders on guest floors.

Food Service Employees require valid room service checks or authorized pick-up request before going on the guest floors.

F. REPORTING CRIME -

The Security Department, with its able staff, attempts to control crime and provide a safe operation. Due to the enormity of the Club, they cannot be everywhere at once, and your help is needed. Follow these simple security measures:

- 1) Notify Security (ext. 212) of any suspicious person.
- 2) If you are a witness to a crime, relate to the dispatcher as much specific detail as possible, including a description of the individual and the nature of the crime.

G. MEDIA -

Because of the celebrated and historic nature of Mar-a-Lago and its significance to Palm Beach, Florida and the United States, we are contacted daily by the media (television, radio, newspapers, magazines, wire services). They want to know what is happening at the Club and they want comments for their articles or newcasts. It is important that **no** Club employee other than the Managing Director, Special Events Manager or Director of Membership comment to the press on the Club or it's members.

GUEST NAMES

All guests are to be treated in a friendly, courteous, professional manner. Systems or procedures are used within each department to inform employees of our guests' names. We want you to use the guests' name at all times if possible. Be friendly to guests and call them by name; however, do not be too familiar with a guest by using his/her first name.

SAFETY AND HEALTH

The Club's goal is to provide a safe and healthy environment for employees. Each employee is expected to comply with all safety and health requirements whether it is established by management or by federal, state or local law.

The Club does not expect any employee to take unnecessary risks. Study the job assigned to you and learn the safety rules of your department. In everything you do, make sure that you have observed every reasonable safety precaution.

Most Club accidents are simple and common, such as slips and falls, cuts, burns, sprains and strains. They are easy to prevent. Observation of the following general rules will prevent many employee accidents:

1. Report all injuries at once to your supervisor.
2. If you are not sure how to do a job safely, ask your department head.
3. Horseplay and practical jokes are prohibited.
4. Put equipment away after use. Don't block passages.
5. Broken chairs, loose and worn carpeting, missing lights and other equipment needing maintenance may cause accidents. Report these along with any other safety hazard at once to your department head.
6. Wear the right clothing for the job.
7. Show other employees the safe way to do the job.
8. If the load seems too heavy to lift safely, get help. When lifting any load, follow the safe lifting practice listed below:
 - a. Be sure you can handle it alone. If not get help.
 - b. Face the load squarely.
 - c. Secure a firm footing with your feet properly spread.
 - d. Bend your knees.
 - e. Get a grip on the load.
 - f. Keep a straight back and lift by straightening your legs gradually not suddenly.

- g. Keep the load close to your body.
- h. Don't twist your body.
- 9. Do not carry a load so that it will block your vision. Make sure you can see where you are going.
- 10. Avoid slippery, wet or greasy floors. Clean up wet or greasy spots as they occur.
- 11. Use a ladder to reach things that are up high. See that the ladder is firmly placed. While on the ladder, don't reach too high or too far to one side.
- 12. Place broken glasses, dishes, etc., in special receptacles designated for this purpose.
- 13. Do not operate equipment unless properly trained and specifically instructed to do so by your supervisor.

All accidents occurring on the Club's premises or to Club employees, regardless of whether they result in an injury, must be reported immediately to your supervisor. The Club is required to report all work-related injuries as soon as possible. If you are too seriously injured to describe the facts surrounding the accident, it is the responsibility of the supervisor to supply the information to the Human Resources Manager.

If a member has an accident, you should see that he or she is comfortable and then immediately notify your supervisor, department head, Managing Director and the Security Department. Any property damage due to accidents should be reported in the same manner.

WORKERS' COMPENSATION

We all do the best job we can to prevent accidents and injuries at home and at work. If you spot a safety hazard on the job, report it to your supervisor immediately. Workers' Compensation is provided by the company to pay an employee partial compensation if he or she loses time due to a work-related accident.

In case you are injured:

- 1. Report the injury immediately to your supervisor.
- 2. Following first-aid or medical treatment, your supervisor will contact security to file an incident report and then notify the Human Resources Manager.

3. The Human Resources Manager completes the Workers' Compensation Report and submits copies to the insurance carrier. When you lose work time because of an injury on the job, a medical certificate from your doctor or the Health Center must be submitted to the Human Resources Manager with a return to work date prior to return to work.

Remember to **report all injuries immediately**, no matter how small they may be, to your supervisor. Though the injury may seem small at first, it may become serious later, and result in lost work time.

EMERGENCY PROCEDURES:

Adhere to the following procedures in emergency situations:

A. FIRE -- In case of fire or smoke: STAY CALM

1. Pull fire alarm
2. Dial Security at Extension 212 and give location of fire, (closest room number, floor, type of fire or smoke), remain on the phone to give additional information as required.
3. When the fire department or Club fire brigade arrives, direct them to the location. Remember, most persons die from smoke and poisonous gases. Stay low to the ground if there is any smoke at all. If you encounter smoke or fire at lower levels, turn around and walk up to clearer air, or use another exit.
4. Be certain to follow instructions of the fire department and the Club fire brigade in order to ensure the safety of all guests and employees.

B. BOMB SCARE OR WARNING

You all know your own work areas, and are usually aware of any unfamiliar items. A bomb may be concealed in a length of pipe, small parcel, suitcase or paper bag. When a suspicious item is discovered DO NOT TOUCH and report immediately to:

1. Club operator - dial 300
2. Security - dial 212

C. GUEST ILLNESS

- Follow the same procedures as listed above.

The most important thing to remember in an emergency is

DO NOT PANIC!

USE OF CLUB'S COMPUTER SYSTEM AND SOFTWARE PROGRAMS:

A. GENERAL

The Club has invested a large sum of money in its computer system and software programs. The information in the computer system represents much work by many employees and is an important component of the Club. In order to protect this valuable

information, no employee is allowed to bring to work any computer games, hardware, programs or software which is not licensed and registered under the Club name, or install or otherwise use any such items unless they have been approved in advance, in writing, by the Managing Director. The reason for this is simple. Outside programs may contain viruses which can disrupt or destroy our computer system. Even if you are sure that the program you bring does not contain a virus, and that it would not damage our computer system, you are not to use any outside program without written advance approval. If software programs are not properly registered, there may be criminal and civil penalties for their use.

In addition, the Club has noted that some computer programs also contain games or programs which are not related to the work of the Club. These programs are not to be played by any employee at any time during the work day. Only computer programs that are directly related to the work of the Club are to be used on Club computers.

No employee is authorized to download or remove any information from the Club's computer system without the expressed advance permission of the appropriate supervisor. (See the Club's policy on security.)

B. ELECTRONIC MAIL

During your workday, the electronic mail and other information systems are not to be used in a way that may be disruptive, offensive to others, or harmful to morale.

Specifically, it is against Club policy to transmit E-mail communications that contain ethnic slurs, racial epithets, or anything that may be construed as harassment or offensive to others based on their race, national origin, sex, sexual orientation, age, disability, religious or political beliefs, is strictly prohibited and may constitute grounds for termination.

Employees should use the information systems for Club business only. The E-mail system also should not be used to solicit others for commercial ventures, religious or political causes, outside organizations, or other personal matters unrelated to your job.

For privacy reasons, employees should not attempt to gain access to another employee's personal file of E-Mail messages without the latter's express permission. Further, employees shall not use a code, access a file or retrieve any stored communication, other than where authorized, unless there has been prior clearance by an authorized Club representative.

Management reserves the right to enter an employee's E-mail files on an "as needed" basis by authorized personnel to ensure the Club's legitimate business interest in the proper use of its property. System security features such as passwords and message

delete functions do not neutralize the employer's ability to access any message at any time. Employees who use E-mail for private, non-job-related purposes do so at their own risk. By using the Club's equipment and E-mail systems, employees consent to have such E-mail use, messages and files monitored by authorized firm personnel.

C. VOICE MAIL

The Club utilizes a voice mail system which allows employees, clients, etc. to leave voice messages. The Club reserves the right to monitor and review all messages left on the voice mail system at any time. All voice messages should be confined to business or work-related matters.

D. RIGHT TO INSPECT

No employee is to have an expectation of privacy with regard to any voice mail messages, E-mail or computer files, and the Club has the right to monitor and review these electronic and computer systems at any time.

DISCLOSURE OF EMPLOYEE INFORMATION

REFERENCE CHECKS

All inquiries regarding a current or former employee of The Mar-a-Lago Club must be referred to the Human Resources Manager.

Should an employee receive a written request for a reference, he/she should refer the request to the Human Resources Manager for handling. No Mar-a-Lago Club employee may issue a reference letter to any current or former employee without the permission of the Human Resources Manager or Managing Director.

Under no circumstances should any Mar-a-Lago Club employee release any information about any current or former Mar-a-Lago Club employee over the telephone. All telephone inquiries regarding any current or former employee must be referred to the Human Resources Manager.

In response to an outside request for information regarding a current or former Mar-a-Lago Club employee, the Human Resources Manager will furnish or verify only an employee's name, dates of employment, job title and department. No other data or information regarding any current or former Club employee, or his/her employment with Mar-a-Lago will be released unless the employee authorizes the Club to release such information in writing or Mar-a-Lago is required by law to furnish any information.

NO SOLICITATION/NO DISTRIBUTION

Persons who are not employees of the Club are prohibited from soliciting our employees, distributing literature, or selling merchandise to our employees, on our premises at any time. The purpose of this rule is to prevent employees and customers from being disrupted or imposed upon by such activities and to maintain our operations at peak efficiency at all times.

For similar reasons, solicitation and distribution of literature are prohibited during the working time of either the employee making the solicitation or distribution, or the targeted employee. The term "working time" does not include an employee's authorized lunch or rest periods, or other time when the employee is not required to be working.

Distribution of literature is prohibited in work and customer areas at all times. The distribution of literature in such a manner as to cause litter on the Club's property is prohibited. Off-duty employees are not allowed to return to the interior or working areas of the Club's premises until the next scheduled work time.

The Club maintains bulletin boards to communicate Club information to employees and to post notices required by law. These bulletin boards are for the posting of Club information and notices only, and only persons designated by the Managing Director may place notices on or take down material from the bulletin boards. The unauthorized posting of notices, photographs or other printed or written materials on bulletin boards or any other Club property is prohibited.

INSPECTIONS

The Club respects its employees' right to privacy. However, for security purposes, we maintain the right to inspect certain personal belongings.

Each employee agrees, as a condition of continued employment, to allow management to inspect employee personal property on our premises. Any package brought into or taken out of our premises may be inspected. Our premises and equipment, including Club vehicles, lockers and desks, are subject to inspection at any time.

Refusal to cooperate in an inspection or search will be considered a violation of your terms of hire and insubordination.

INTERNAL INVESTIGATIONS

From time to time The Mar-a-Lago Club may be required to conduct internal investigations pertaining to security, auditing or work-related matters. Employees are required to cooperate fully with and assist in these investigations if requested to do so.

Whenever necessary, in Management's discretion, employees' work areas (i.e., desks, file cabinets, etc.) and personal belongings (i.e., brief cases, handbags, etc.) may be subject to a search. Employees are required to cooperate.

Management will generally try to obtain an employee's consent before conducting a search of work areas or personal belongings, but may not always be able to do so.

OUTSIDE EMPLOYMENT

The Club does not object to your holding other jobs, provided that there is no conflict of interest and your job at the Club comes first. However, outside employment which interferes with your obligations to the Club is prohibited. In addition, no employee shall claim to be a Club representative in connection with any outside employment.

Before accepting any supplementary job, it is mandatory that you notify your Supervisor and the Department Head to determine if there is a conflict of interest or if it would adversely affect your job performance at the Club. If the Club determines that a conflict of interest exists or acceptance would adversely affect your job performance, you shall not engage in outside employment. Failure to notify the Supervisor and the Department Head in advance of any outside employment will be grounds for immediate termination.

Please note that if at any time your job at the Club suffers due to additional employment elsewhere, the Club reserves the right to ask you to give it up. Failure to comply with such a request will also be grounds for immediate termination.

PROPERTY OF EMPLOYER

Employees may not remove from the Club premises any Club property not belonging to the employee. Any other property that an employee removes from Club premises, must be accompanied by a Club Package Pass, signed by a department head or his/her designated supervisor.

Upon termination of your employment, you must surrender to the Club any and all material including, but not limited to, drawings, manuals, reports, documents, lists of the Club's vendors and customers, and the like (including all copies thereof), that you have in your possession relating to the business of the Club, or its affiliates. You recognize that all such materials are the property of the Club solely and that you have no right, title, or other interests in or to such materials.

EMPLOYEE APPRAISAL

It is the objective of the Club to provide an atmosphere in which each employee can receive periodic, thorough appraisals of their performance and compensation. The Club uses the performance evaluation as a means to achieve these objectives. Each Manager, Supervisor and employee should be familiar with their role in contributing to the success of the appraisal system.

TELEPHONE COURTESY PROCEDURES

Telephone Calls - Personal calls are prohibited, except in an emergency, since it interferes with the flow of business. Telephone courtesy is an essential part of every employee's interaction with guests. All incoming calls should be answered according to the following mandatory procedures:

1. All calls are to be answered within three rings

2. Answering a Department line:
 - a. standard greeting (i.e., Good Morning/Afternoon/Evening).
 - b. Give the name of the department.
 - c. Give your name.
 - d. Offer assistance: "Good morning, Reception Desk. This is John. How may I help you?"
3. Answering another individual's line:
 - a. Standard greeting.
 - b. Identify whose office or department.
 - c. Give your name.
 - d. Offer assistance or to take a message: "Good afternoon, Mr. Smith's office. This is Mary. How may I help you?"
4. When placing a call on "hold:"
 - a. Use the word "wait," not "hold."
 - b. Always ask permission and wait for guest's response: "Are you able to wait?"
5. Returning to a call placed on "hold":
 - a. Always thank the guest for waiting or apologize for the wait.
 - b. Give your name.
 - c. Offer assistance: "Thank you for waiting, this is Mary. How may I help you?"
6. When transferring a call:
 - a. Always announce the transfer of a call to the party receiving the call: "Mr. Smith, I am transferring Bob Jones to you."
 - b. The caller should then be connected and an announcement of the connection made: "I have Mr. Smith on the line now. Go ahead, please."
7. When ending a conversation:
 - a. Always say "thank you" or "you're welcome."
 - b. Use the guest's name if possible.
 - c. Let the caller know you are happy to be of service or sorry you are unable to help.
 - d. End the conversation with "good-bye" and hand up the receiver gently: "Thank you for calling, Mr. Smith. We're glad we could help. Good-bye."

EMPLOYEE ATTENDANCE AND TARDINESS

Your schedule is developed after considering the Club's needs and flow of business. Your adherence to the schedule and flexibility concerning any necessary changes will help ensure our Club's success.

Each employee is required to work the hours normally scheduled for his or her assigned position.

Employee's work schedules will be those hours authorized by their Supervisor to meet operational requirements.

If you are unable to report to work for any reason, you must notify your supervisor no later than Three (3) hours prior to your scheduled reporting time, stating your reason for lateness or absence, and when you expect to arrive at work. Check with your supervisor to see if additional notice time is required.

In the event your supervisor is not available, you are to contact SECURITY Ext.212 or the Human Resources Manager. You must call in each day of your absence. Upon the third consecutive day of absence, a Health Care Provider's note will be required of the employee before returning to work. An employee who is absent for three consecutive days without proper notice to the Club may be considered to have voluntarily resigned his or her position with the Club.

Failure to adhere to employee attendance policies results in time consuming arrangements and costly replacements and may lead to disciplinary action.

Tardiness places an unfair burden upon your supervisors and co-workers. All efforts should be made to be at work according to schedule. Your supervisor is to be contacted if it is unavoidable for you to be late to work. Continued tardiness will result in disciplinary action, up to and including termination.

LINEN ABUSE

Linen abuse is considered to be any type of mishandling or misuse of linen, causing damage to the point that the linen would be unfit to place before a guest.

The following are the most common abuse occurrences.

1. Using linen as rags for cleaning.
2. Leaving linen lying on the floor.
3. Cleaning ashtrays with linen.
4. Using napkins as food covers.
5. Carrying linen on your person to be used as sweatbands, handkerchiefs, etc.
6. Throwing rags or linen in the trash.
7. Mixing rags with linen.

Violation of these linen abuse standards may lead to disciplinary action. The replacement of lost or damaged linen is a costly process, and we need everyone's help in curtailing this enormous expense.

TIME REPORTING - SIGNING IN AND OUT

You must check in first at the guard post at the employee's entrance on Southern Boulevard, and then again upon your arrival at Post One. At the end of your shift you must check out at Post One and also at the guard post at the employees' exit on Southern Boulevard.

When reporting in and out of work employees will be solely responsible for keeping their own hours worked by logging in and out at the timekeeping terminal. Pay is calculated for the actual hours worked by the actual entry of this information. Any deviations in the schedule including overtime can be done with the supervisors approval only. These deviations are indicated in writing at the end of the work week for presentation to payroll.

Under no condition shall an employee enter for time other than his/her own. An employee who leaves the Club during his/her work schedule must first obtain their supervisor's permission. Failure to adhere to these procedures, will result in disciplinary action, up to and including termination of employment.

NOTE:All Wait Staff employees must also sign in on the "DAILY SIGN IN SHEET" which will be located with your Captain.

CHANGE OF ADDRESS OR STATUS - PERSONNEL RECORDS

To keep necessary Club records up-to-date, it is extremely important that you notify the Human Resources Department of any changes in:

1. Name and/or marital status.
2. Address and/or telephone number.
3. # of eligible dependents.
4. W4 Deductions.

INITIAL EMPLOYMENT PERIOD

Every new employee goes through an initial period of adjustment in order to learn about the Club and about his/her job. During this time, the employee will have an opportunity to find out if he/she is suited to, and likes, his/her new position.

Additionally, the initial employment period gives the employee's supervisor a reasonable period of time to evaluate his/her performance. The initial employment period is 3 months.

During this time, the new employee will be provided with training and guidance from his/her Supervisor. He/she may be discharged at any time during this period if his/her Supervisor concludes that he/she is not progressing or performing satisfactorily. Additionally, under appropriate circumstances, the initial employment may be extended.

At the end of the initial employment period, the employee and his/her supervisor may discuss his/her performance. Provided his/her job performance is "satisfactory" at the end of the initial employment period, he/she will continue in our employment.

EMPLOYEE CATEGORIES

- * Full Time - Year Round Employee
- * Seasonal Employee

WORK HOURS, SALARY AND OVERTIME PREMIUMS

A. WORK HOURS

The Club never shuts down from November 1 to Mother's Day; for 24 hours a day, 7 days a week, it serves the diverse needs of our members. Therefore to ensure adequate coverage at all times, departments have arranged different schedules for their employees.

B. SALARY

The Club's policy regarding personnel is to offer competitive starting wages and to maintain a fair and equitable wage structure. Wage increases are given when appropriate based upon results of performance evaluations and/or employment status change.

The work week at the Club begins on Monday and ends on Sunday. Scheduled paydays are as follows: Friday pay vouchers indicating deposit into your existing Great Western banking account will be issued.

If there is a discrepancy in your paycheck, advise your department head immediately. Do not call or go to the payroll department. If your department head is not available, contact the Human Resources Manager and assistance will be provided.

The Club is unable to make advances on employee paychecks.

C. OVERTIME PREMIUMS

1. Hourly and Salaried Employee (non-exempt)

Hourly or salaried employees are eligible for overtime premium at one and one-half (1.5) times their base hourly rate under the following conditions:

Overtime work has been specifically authorized by the direct Supervisor in advance or in writing after the fact. More than forty (40) hours are actually worked by that individual in one work week, not including sick time, vacation, holidays and time off for personal business and other non work time.

The work week commences on Monday morning and ends Sunday at midnight.

2. Salaried Employee (exempt)

A salaried exempt employee is not compensated directly for specific overtime hours worked. A salaried employee is paid to accomplish a specific job and his/her salary is based upon the fact that hours in excess of 40 per week may be necessary on occasion.

Overtime is at the request of a supervisor or department

head for emergency client business. The Supervisor must authorize overtime and sign the employee's schedule signifying such authorization.

EMPLOYEE BENEFITS AND PROGRAMS

As a regular full time year round employee you will enjoy an excellent benefits package which is designed to help protect your health, and plan for your future. The Mar-a-Lago Club reserves the right to change any or all of these benefits at any time.

- * Group Health Insurance
- * Group Life Insurance
- * Group Dental Insurance
- * 401K - After one full year of continuous employment

For information relating to the cost of such benefits, eligibility requirements, etc. please contact the Human Resources Manager.

BEREAVEMENT LEAVE

In the event of a death in an employee's immediate family, the Club will allow a maximum of three (3) days off with pay for funeral related leave. Immediate family includes spouse, child, mother, father, brother, sister, grandparent, grandchild, aunt, uncle, daughter-in-law, son-in-law, mother-in-law, father-in-law, step-child, step-parent.

When a death occurs, notify your supervisor at once with all of the details, including the family member who died and where the funeral will take place. The supervisor should notify the Human Resources Manager of the reason and length of the employee's absence.

JURY DUTY

An employee summoned for jury duty will be compensated in the following manner only if he/she notifies his/her supervisor and provides him/her with a copy of the summons.

During the jury leave, the employee will be paid the difference between jury compensation and the employee's regular pay for up to three days. Any day in which you are excused from jury service at a time when there are three (3) or more hours remaining in your daily scheduled shift, you will report for work.

NOTE: If the jury duty falls at a time when the employee cannot be away from work, the court may allow the employee to choose a more convenient time to serve if he/she makes a request in accordance with the court's procedure.

MILITARY LEAVE

An employee who is a member of the United States Army, Navy, Air Force, Marines, Coast Guard, a member of the National Guard, a member of the Reserves or Public Health Service will, where a specified period of active or reserve duty is mandatory, be granted a leave of absence in accordance with applicable law.

Upon receipt of orders for active or reserve duty, the employee should notify his/her supervisor, as well as the Human Resources Manager immediately and he/she must submit a copy of his/her orders to his/her supervisor and the Human Resources Manager.

MATERNITY LEAVE OF ABSENCE

Pregnancy, childbirth, and related medical conditions are temporary disabilities for the purpose of any health or temporary disability insurance or sick leave policy maintained by the Club. An employee who is pregnant, or has medical conditions related to pregnancy will be granted a leave of absence and will be eligible for the same leave benefits as received by employees suffering from illness or other temporary disabilities.

FAMILY MEDICAL AND PERSONAL LEAVE OF ABSENCE

As a result of the Federal Family and Medical Leave Act ("Act"), the Club provides an added benefit to each employee. Each employee will have up to 12 weeks of unpaid family leave during a "rolling" 12-month period month period for: (1) the birth and care of a newborn child; (2) adoption or foster care of a child; (3) to provide care to an employee's spouse, son, daughter or parent (or grandparent under certain circumstances) who has a serious health condition; and (4) the employee's own serious health condition which makes the employee unable to perform his/her job functions. Upon an employee's return from this leave, the Club guarantees that the employee will be placed in the same or equivalent position, absent grievous and substantial business reasons affecting the Club.

This leave may be used during the rolling 12-month period even if the full 12 weeks have not been taken. Intermittent use of this leave or a reduced leave schedule may be allowed only where leave is taken for a sick family member, or for an employee's own serious health condition, when medically necessary. If you are not eligible for the 12 weeks unpaid leave, you may still be eligible to take an unpaid leave of absence for medical reasons or a personal leave of absence at the discretion of the Club.

As a result of the Act, it has been necessary to modify some provisions of our policies on sick days, short term disability and personal leaves of absence to comply with the Act. The information that follows is designed to address the great majority of situations that arise in a regular or routine manner. The federal Family Leave Law, however, is subject to on-going review process and interpretation by the courts, therefore, the statements made here can not possibly address every contingency that may arise in interpreting this new and broad Law. For these reasons, special situations will be reviewed on a case-by-case basis. Set forth below is the Club policy with regard to medical and personal leaves of absence, including provisions of Act.

If you have any questions, please contact the Human Resources Manager who will be glad to answer your questions.

A. 12 Week Family Medical Leave

Purpose:

This policy allows an employee to request a family or regular medical leave of absence (LOA) because the employee has a serious health condition which makes the employee unable to perform the functions of the job position (this policy includes a serious health condition related to pregnancy).

Policy:

All employees with a minimum of 12 months of service (and 1250 or more hours worked during the previous 12 months) at the time the family medical LOA begins, are eligible for up to 12 weeks of unpaid family medical LOA during a rolling 12-month period. Employees are eligible so long as the employee is certified to be unable to work during this LOA period.

See Section D below for details on requesting this LOA.

B. Regular Policy for those Not Eligible for Family Medical LOA (e.g. previously used Family LOA)

All employees who are not eligible for the 12 week family medical LOA at the time the medical LOA begins (e.g., less than 12 months of service, less than 1250 hours worked, or insufficient time has passed since a previous LOA) are eligible for unpaid medical LOA normally not to exceed 10 days.

See Section D below for details on requesting this LOA.

C. Family and Personal LOA

This policy allows an employee to request consideration for a family or personal LOA.

1. Policy (Family LOA):

All employees with a minimum of 12 months of service and 1250 or more hours worked in the previous 12 months at the time the family LOA begins are eligible for up to 12 weeks of unpaid LOA during a rolling 12-month period for:

- * the birth or adoption (or foster care) of a child.
- * providing care to a family member who has a serious health condition (family member is defined as spouse, child, or parent).

Please Note:

A child is one who is under 18 years of age or if 18 years or older must be incapable of self-care because of mental or physical disability.

2. Policy (Personal LOA) Employees who are not eligible for the 12 weeks family LOA at the time the LOA begins (e.g., less than 1 year of service, less than 1250 hours worked, or insufficient time has passed since previous LOA) are eligible for a personal LOA without pay in the Club's sole discretion.

Employees requiring additional time may be required to terminate employment and advise the Club of availability for future rehire. Request for non-family personal LOA may not be approved due to the effect on department operations and/or due to the individual's job performance.

See Section D below for details on requesting this LOA.

D. General Procedures for LOA

1. While on an approved family or other LOA, an employee does not accrue time toward sick leave, vacation days, merit review nor does he/she receive holiday pay.

2. Detailed Procedures:

(a) A request for any medical LOA must be certified by the employee's health care provider on the claim form supplied by the Human Resources Manager.

(b) An employee requesting a medical LOA must provide the Human Resources Manager with sufficient medical evidence to support the condition that prevents the employee from performing the assigned job duties. This signed health care provider's statement must include effective date of the LOA, reason for the LOA and approximate date of return. If the medical evidence is deemed to be inconclusive, the Human Resources Manager may arrange for a medical examination (at the Club's expense) to determine the extent of the employee's condition. The Club may require periodic recertification.

The duration of a medical LOA is determined by the period of time the employee has a serious health condition which makes the employee unable to perform the job efficiently and safely.

(c) Reinstatement may not be guaranteed in management's discretion (employee will be notified prior to beginning the LOA) if the employee is a key salaried employee.

(d) An employee who returns from a family medical or family LOA on or before the approved LOA has elapsed will be reinstated to his/her previous department and job. Otherwise, every effort will be made to place the returning employee into an equivalent position.

However, for an employee returning from a LOA that has exceeded the allowed maximum calendar days, no

guarantee of reinstatement can be made. In addition, no guarantee of reinstatement can be made for a regular medical or non-family personal LOA. However, if possible, the employee will be re-employed in accordance with the following priorities:

- * In his or her former job if available;
- * In a comparable job at the same (or higher grade) if available, and if the employee is qualified for that job (at the same salary or higher);
- * In a lower grade job, if available, and if the employee is qualified for that job. If reemployed, the employee will receive the same salary as he or she received immediately prior to the LOA unless such salary exceeds the maximum salary for the employee's grade upon reemployment, in which case the employee will be paid at that grade maximum; or
- * If no job is available at the termination of the LOA, the employee will be placed on a preferential hiring list at the Club's sole discretion in a position for which the employee is qualified.

- (e) A request for an LOA is expected to be submitted to the employee's supervisor and the Human Resources Manager at least 30 days prior to the effective date of the LOA (emergencies excepted). This request should include the effective date of the LOA, reason for the LOA and approximate date of return.

For a medical or family LOA, each employee will be required to use earned vacation, personal days and sick pay benefits at the beginning of the LOA. For a personal LOA, only earned vacation will be required to be used.

- (f) For each employee granted a family medical or family LOA, the Club will continue the group health insurance benefit coverage under which the employee was covered as of the last day worked. However, any premiums paid by the employee prior to the LOA must continue to be paid by the employee during the LOA. Payments are due at the same time as they would be made by payroll deduction. If an employee fails to return to work after taking a family or medical LOA, the employee may be potentially liable for payment of health

insurance premiums paid by the employer during the LOA.

- (g) An employee on an LOA must notify the Human Resources Manager of intent to return at least 7 days prior to the desired return date. Medical certification of ability to resume duties must be provided to the Human Resources Manager prior to returning to work. Failure to provide medical certification may result in disciplinary action or termination.
- (h) An employee must contact the Human Resources Manager with a request for an LOA extension at least 14 days in advance of the scheduled return (emergencies excepted). Medical certification is required prior to the beginning of the extension for a medical LOA.
- (i) The Human Resources Manager will notify the appropriate Manager of the date of return of an employee returning from an approved LOA.
- (j) If an employee fails to return to work at the conclusion of an LOA, the LOA will be cancelled and employment will be discontinued as a voluntary termination with the effective date of termination the last day actually worked.
- (k) An employee requiring a medical or personal LOA who has not completed the initial probation period is not eligible for such a LOA and must terminate his/her employment. These employees may be eligible for conversion of group medical insurance. At the Club's option this category of employee may be placed on a preferential hiring list.
- (l) Abuse of an LOA may result in termination of employment.
- (m) In any case in which a husband and wife are entitled to a LOA, the total days of family LOA to which both may be entitled may be limited to 12 weeks during any rolling 12-month period if the family LOA is taken for the birth, adoption (or foster care) of a child.
- (n) In addition, as an alternative to the LOA, the Club and each employee may mutually agree to alternate employment for the employee for the time during which the employee would otherwise be entitled to a LOA under Club policy. Such period of alternate employment will not cause a reduction

in the period of the LOA to which the Club employee is otherwise entitled for their own serious illness.

- (o) The rolling 12-month period in which the 12 weeks of LOA entitlement occurs is a "rolling" 12-month period measured backwards from the date an employee uses a family or medical LOA.

Exception Approval:

Questions concerning this policy should be directed to the Human Resources Manager.

GRIEVANCE PROCEDURE

The Club recognizes that employees may have questions or problems concerning the Club's policies and procedures. In order to encourage employees to voice these concerns and try to solve the questions or problems that may arise, we have a formal problem solving procedure. Please follow these steps:

- Step 1: You should first request to meet with your immediate supervisor (the person you report to directly). The supervisor will listen and investigate the problem with the intention of finding an agreeable solution for those concerned. In order to facilitate a fair and timely solution, you must contact your supervisor within three days

of the occurrence that created the question or problem.

If you feel the problem is with your immediate supervisor, you may skip step 1 and start the grievance procedure with Step 2.

Step 2: Request to meet with your Department Head. Your Department Head will review the problem (including any action taken by your immediate supervisor) and any other relevant facts involved in order to suggest a reasonable solution. In order to facilitate a fair and timely solution, you must contact your Department Head within three days of the occurrence that created the question or problem (if you skipped Step 1) or within two days of your supervisor's resolution (if you followed Step 1).

If you are not satisfied with your Department Head's handling of the problem, you may proceed to Step 3.

Step 3: Request to meet with the Managing Director, or a designated representative, will thoroughly investigate the problem, review Club policies, procedures, rules and regulations and will make a determination. In order to facilitate a fair and timely solution, you must contact the Managing Director within two days of your Department Head's determination.

The Managing Director, or his or her designee, may review the matter and offer a final decision.

Time spent by an employee in discussing a complaint with management during normal working hours will be considered hours worked for pay purposes.

When two or more employees have a common or similar complaint, the employees may select a spokesperson to represent the group. The final decision on the complaint submitted by several employees through a spokesperson will be binding on all members of the group.

If at any time you feel uncomfortable with this process, as it is outlined here, please feel free to contact the Managing Director to assist you before taking further action.

Due to the serious nature of sexual harassment, such complaints should be referred immediately and directly to the Managing Director and Human Resources Manager.

The Club will not tolerate any form of retaliation against employees who have used the Club's problem solving procedure. In the interest of creating a positive and enjoyable work environment, all employees shall be able to use this procedure without fear of retaliation.

However, it is equally important to realize that the problem solving procedure will not prevent the Club from taking disciplinary action, up to and including termination, against any individual under circumstances where the Club deems disciplinary action to be appropriate.

DISCIPLINARY ACTION

A. GENERAL POLICY ADHERENCE

Policies and procedures are necessary guidelines to provide a basis for fair and equitable treatment of each employee. In addition, these guidelines serve as the basis for a fair relationship between the employee and the Club. It is necessary that these guidelines be applied consistently to each employee regardless of location, department or manager. Then, and only then, can the Club establish the confidence that each employee will be treated consistently according to the administrative and operational guidelines. It is the responsibility of each officer, manager, supervisor and employee to contribute fully toward the achievement of this objective.

B. DISCIPLINARY ACTIONS

Violations of any of the established policies and procedures may result in disciplinary action including probation or discharge. The nature of the disciplinary action is contingent upon the facts and circumstances of the individual situation.

The following employee actions are not all inclusive but, by way of illustration only, are some of the events which could result in discipline including discharge. Thus, your department head may establish additional rules and regulations he or she feels are necessary for the orderly fulfillment of your department's responsibilities. These also must be followed. Other actions may also result in discipline including discharge. (It should be noted that the Club and each employee recognize that the employment relationship is for an indefinite period and may be terminated by either party at will.) By providing this list, the Club in no way restricts its legal discretion to terminate employment.

- a. Insubordination, refusal or inability to comply with reasonable instructions of supervisors or department heads. If your supervisor requests you to do something with which you disagree, always follow the instructions at the time and then discuss it later at an appropriate time and location. However, this excludes obedience to demands constituting discrimination, sexual harassment or illegal conduct.
- b. Interference or hindrance with shift schedules. Failure to work on a shift as scheduled or arranging your own shift replacement without the supervisor's permission.
- c. Unauthorized use of Club telephone or property and/or guest facilities.
- d. Entering the Club more than 30 minutes before your shift begins or leaving the Club more than 30 minutes after the end of your shift without the permission of your department head or supervisor. Entering or

- presence in areas within the Club premises without authorization or just cause.
- e. Presence on Club premises at anytime other than your assigned work shift unless specifically authorized by your department head in advance.
 - f. An essential element of the security procedures of the Mar-a-Lago Club is the key control process. As such, employees who have access to Club keys must recognize the importance of properly safeguarding the keys which have been entrusted to them. All employees should be aware that they may be subject to disciplinary action for any violation of the key control procedures. Guest room keys must never be left in your locker.
 - g. Theft (unauthorized removal) or misappropriation (unauthorized storage, transfer, utilization or possession) of Club services (i.e., unauthorized telephone calls, laundry/valet, food and beverage), or guest, employer or Club property, including items found on the Club premises. All articles found on Club premises must be turned into the Lost and Found area at Security in the Timekeeper's area.
 - h. Altering or falsifying a guest check or credit voucher or forging tips through guest checks.
 - i. Refusal to comply with Club rules, policies or procedures.
 - j. Poor job performance, including unsatisfactory attitude that detracts from job performance or the efficient operation of the Club.
 - k. Violation of sexual harassment policy.
 - l. Failure to report for duty without a bona fide excuse and proper notification to your supervisor.
 - m. Failure to comply with established safety and health rules and safe work procedures or engaging in any conduct that creates a safety hazard.
 - n. Failure to meet performance standards.
 - o. Failure to follow grooming and appearance standards.
 - p. Failure to report a workplace accident immediately. If you are injured on the job, you must immediately report this to your supervisor or Human Resources Manager.
 - q. Falsely stating claims of injury.
 - r. Disorderly conduct on the Club premises, including fighting, horseplay or other action that endangers others or Club property.
 - s. Offensive or disruptive behavior, including threatening employees, using abusive or vulgar language, interfering with others in the performance of their duties, or acting in an immoral or indecent manner on Club property, or while off the Club premises in performance of Club duties.
 - t. Destruction, misuse, or removal of Club property, a guest's property or another employee's property.
 - u. Unauthorized disclosure, discussion, removal or use of Club confidential, information, trade secrets or other

- proprietary information (including information contained in personnel records).
- v. Deliberate omission or falsification of information on employment application, time sheets, production or other Club records.
 - w. Unauthorized distribution of literature, posting of notices or signs on Club, premises, fundraising, selling lottery tickets or merchandise, or soliciting donations or any other type of money raising on Club premises, unless specifically authorized by the Managing Director.
 - x. Refusal to allow security checks and package inspections.
 - y. Reading books, magazines, or newspapers while on duty, except where required in the line of duty.
 - z. Loitering, loafing or sleeping on duty.
 - aa. Neglect of duty causing defective work.
 - bb. Smoking anywhere on club property including 124 Woodbridge Rd. and 1094 Woodbridge Rd.
 - cc. Reporting for duty under the influence of intoxicating liquor, marijuana and/or illegal drugs.
 - dd. Bringing, consuming, possessing, providing, selling, or otherwise using intoxicating liquors, marijuana and/or illegal drugs on Club premises.
 - ee. Dishonesty, including but not limited to intentionally not providing full and truthful information when requested by management.
 - ff. Gambling on Club premises.
 - gg. Bringing, discharging, and/or possessing unauthorized firearms or other weapons on Club property or while off Club Property in the performance of Club duties.
 - hh. Giving or taking a bribe of any nature.
 - ii. Being arrested and/or convicted of any crime which the Club believes is detrimental to the Club and/or its other employees.
 - jj. Theft, attempted theft, removal or unauthorized possession of the Club's property or property of other employees or customers.
 - kk. Misappropriation of Club funds or failure to handle funds in accordance with Club guidelines.
 - ll. Irregular attendance including excessive absenteeism, tardiness and/or unexcused absences.
 - mm. Leaving work station or work without authorization or being in an unauthorized work area during your scheduled work period or on your days off, without your supervisor's specific authorization.
 - nn. Interfering with or hindering of work schedules; failing to work on a scheduled shift; or arranging your own replacement on a shift without permission from a supervisor.
 - oo. Failure to report to work after the expiration of a leave-of-absence or layoff.
 - pp. Defrauding customers of the Club.
 - qq. Embezzlement.

- rr. Disloyalty to the Club, including but not limited to, slandering the Club, or acting in such a manner that could damage the Club's reputation.
- ss. Moral turpitude.
- tt. Failure to wear assigned uniform.
- uu. Entering or leaving the property through any entrance or exit other than the designated employee entrance or exit.
- vv. Punching in/out with another employee's I.D. Card or allowing another employee to punch in/out on your card.
- ww. Unauthorized attendance at guest functions and/or in guest areas, or on the premises including guest rooms, dining rooms and lounges. No unauthorized social contact will be permitted at any time with Club guests.
- xx. Discourteous or inappropriate conduct with guests/members.
- yy. Using guest elevators, escalators, restrooms or any guest facility except when specifically required by job functions or authorized by management.
- zz. Gum chewing, eating or drinking in any public area of the Club.
- aaa. Soliciting gratuities from guests or commenting on the amount of a gratuity.

UNIFORMS AND PERSONAL APPEARANCE

A. UNIFORMS

Employees issued a uniform are responsible for turning their soiled uniform to the Laundry Department at the end of their shift and picking up a clean one for the next day of work. All employee uniforms are laundered by the Club at no charge to the employee.

B. PERSONAL APPEARANCE

Departure from conventional Club attire or personal grooming are not permitted, regardless of the nature of the job performed.

- (1) Every employee has some contact with the public and therefore represents the Club in appearance as well as by actions. The properly attired employee helps to create a favorable image for the Club. Accordingly, personal appearance shall be governed by the following standards:

Good hygiene and grooming practices are required. A daily bath or shower is a necessity and all employees should report to work freshly bathed. Keep in mind you may be going from a hot kitchen to an air conditioned guest room. Body temperatures will change quickly and body odors are offensive. Remember, there is no substitute for good deodorant. Bad breath is also offensive and mouthwash should be used in addition to brushing teeth.

Good hygiene and grooming practices are required. Fingernails, and hair must be clean and neatly trimmed at all times.

Beards, goatees, and un-trimmed sideburns are not permitted. Mustaches must be neatly trimmed. Men's hair should not exceed collar length and must be conservatively styled.

Visible body piercing is not permitted for men or women, nor ear jewelry for men.

Hair must be neatly arranged and kept from covering eyes, and must be covered or restrained where required by health code.

All employees must wear their nametags (to be provided) at all times while on duty.

All employees are expected to report to work in clean, neatly pressed clothing, clean shoes and clean personal appearance.

Female employees who are not required to wear a uniform may wear suits, dresses, skirts or slacks with blouses or sweaters. "Mini" skirts are not permissible.

No blue jeans or jeans of any color are permitted. Denim outfits resembling blue jeans and jean skirts are also unacceptable. No strapless or backless garments may be worn. Females must wear the proper undergarments, including a bra and a full or half slip where necessary, depending on the sheerness of the outer garment. Hose are required with skirts and dresses. Hose or socks are required with pants.

Jewelry: For safety reasons, jewelry should be kept to a minimum. Acceptable jewelry for service employees is a wrist watch and a total of three rings. Female service employees are allowed to wear one pair of small earrings (no larger than a dime). Non guest contact female employees are allowed to wear a maximum of two earrings in each ear.

Tattoos: Exposed tatoos are not allowed on any public contact employees.

FULL TIME YEAR ROUND EMPLOYEES - During the summer months when the Club is closed and there is no public contact you may see your Department Head as to what is considered to be proper attire for your position.

- (2) Supervisors have the responsibility to decide when an employee's appearance is unacceptable. In the event of an unacceptable appearance, the Supervisor may request that the employee return home to change or take an appropriate corrective action. The employee generally shall not be compensated for any such time away from work, and repeated violations of this Policy will be cause for disciplinary action.

AIDS POLICY

The Club recognizes that Acquired Immune Deficiency Syndrome (AIDS), its related conditions such as AIDS Related Complex (ARC), and persons with seropositive test results pose significant and delicate issues for employees in the workplace.

Accordingly, we have established the following guidelines for handling employee issues that arise when an employee is affected by this disease.

(1) The Club is committed to maintaining a safe and healthy work environment for all employees.

(2) Consistent with this commitment, the Club will treat AIDS the same as other illnesses in terms of all our employee policies and benefits, such as group health and disability benefits.

(3) Based on the overwhelming preponderance of available medical and scientific opinion, including statements from the U.S. Public Health Service, Centers for Disease Control, there is no evidence that the AIDS virus is casually transmitted in ordinary social or occupational settings or conditions. Therefore, subject to changes in available medical information, it is the policy of the Club that employees with AIDS or any of its related conditions may continue to work and the Club will provide them with reasonable accommodation as long as they are medically able to perform the duties of their position.

(4) Employees who are affected by AIDS or any other life-threatening illness will be treated with compassion and understanding in dealing with their personal crises. Co-workers will be expected to not refuse to work or withhold their services for fear of contracting AIDS by working with an AIDS affected person, and to not harass or otherwise discriminate against an AIDS-affected employee.

(5) Recognizing the need for all employees to be able to be accurately informed about AIDS, upon request, the Club will make every effort to have information available regarding the facts about this disease, how it is transmitted and not transmitted and how best to contain it from spreading. Employees affected by AIDS or any of its related conditions or concerned about AIDS are encouraged to contact Human Resources Manager to discuss their concerns and to obtain additional information.

(6) The Club will treat all medical information obtained from employees with AIDS or any of its related conditions confidentially as required by law.

The Club reserves the right to change this policy or make appropriate revisions, additions, amendments or corrections. We will notify you of any substantive changes.

If you have any questions about this policy or its interpretation or the information upon which it is based, please contact the Human Resources Manager.

SUBSTANCE ABUSE POLICY

Our Club strives to provide a safe work environment and encourages personal health. In regard to this, the Club considers the abuse of drugs or alcohol on the job to be an unsafe and counterproductive work practice. Quite simply, our goal is to maintain a work environment that is free from the effects of alcohol and drug abuse.

While the Club has no intention of intruding into the private lives of its employees, the Club does expect employees to report for work in condition to perform their duties. It is, therefore, Club policy that an employee found with the presence of alcohol or illegal drugs in his/her system, in possession of, using, selling, trading, or offering for sale illegal drugs or alcohol during working hours, may be subject to disciplinary action up to and including discharge. (Club sponsored activities which may include the service of alcoholic beverages are not included in this provision.)

Substance Abuse includes possession, use, purchase or sale of drugs or alcohol on Club premises. It also includes reporting to work under the influence of drugs or alcohol. Prescription drugs-prescribed by the employee's physician may be taken during work hours. The employee should notify the Supervisor if the use of properly prescribed prescription drugs will affect the employee's work performance. Abuse of prescription drugs will not be tolerated.

An employee reporting for work visibly impaired is unable to properly perform required duties and will not be allowed to work.

POLICY ON SMOKING

Smoking is prohibited by any staff employee of The Mar-a-Lago Club on any and all properties adjacent to or that of The Mar-a-Lago Club to include:

124 Woodbridge Road
Palm Beach, FL

1094 Woodbridge Road
Palm Beach, FL

DRUG/ALCOHOL USE AND TESTING

The Mar-a-Lago Club recognizes that employee drug abuse interferes with the Club's level of production, as well as its competitive position in the marketplace, and can result in costs, delays, and tragedies associated with work-related accidents. As a condition to employment or continued employment, you must refrain from reporting to work or working with the presence of drugs or alcohol in your body.

To address the problem of drug/alcohol abuse and to comply with Florida's Workers' Compensation Drug-Free Workplace Act (the Act) The Mar-a-Lago Club adopts the policies and procedures detailed below. This policy will be administered in accordance with all relevant laws (state and local), including the ADA, the Florida Civil Rights Act, the Workers' Compensation Act, and in a non-discriminatory fashion.

To protect the health, safety, and welfare of all Mar-a-Lago Club employees, it is the Club's policy that the unlawful manufacture, distribution, dispensation, possession, or use of controlled substance on any Club property is absolutely prohibited. Controlled substances include, but are not limited to, amphetamines, barbiturates, cocaine, heroin, morphine, PCP, marijuana, hashish, and any other controlled substance listed in Schedules I through V of Section 202 of the Controlled Substance Act, 21 U.S.C. § 812 or in the Florida Statute on controlled substances, except for medication prescribed by the employee's physician.

You are also prohibited from drinking alcohol during the business day. You are also prohibited from bringing alcoholic beverages onto the Club premises. Special care shall be taken during Company-sponsored social events for employees. In these cases, employees and guests below the legal age will not be allowed to drink alcoholic beverages. The amount of time alcohol is served will be limited as well as the quantity of the alcohol. If necessary, transportation will be arranged for someone if his or her driving ability seems to be impaired.

The Mar-a-Lago Club will test for the presence of drugs under the following circumstances: 1) pre-employment testing, 2) reasonable suspicion testing (including post-accident incidents), and 3) follow-up testing. Such testing will be done in accordance with the Worker's Compensation Drug Testing Program, which policy had been given to all employees or can be obtained from the Human Resources Manager. Refusal to submit to the test or having a confirmed, positive test result will result in immediate discipline, including termination. Any questions about this policy should be referred to the Human Resources Manager.

Any violation of The Mar-a-Lago Club's Drug/Alcohol Free Workplace Policy will result in appropriate discipline, up to and including termination.

THIS POLICY REPRESENTS THE MAR-A-LAGO CLUB'S CURRENT POLICY FOR DEALING WITH A SERIOUS NATIONAL PROBLEM WHICH POSES A SAFETY THREAT TO THE WORKFORCE. THIS POLICY MAY BE CHANGED BY THE MAR-A-LAGO CLUB IN ITS DISCRETION. THIS POLICY IS NOT INTENDED TO CREATE A CONTRACT BETWEEN THE MAR-A-LAGO CLUB AND ANY EMPLOYEE. NOTHING IN THIS POLICY CHANGES THE CLUB'S ABILITY TO TERMINATE AN EMPLOYEE AT WILL, WITH OR WITHOUT CAUSE OR NOTICE.

MISCELLANEOUS

A. STAFF CAFETERIA

For the purpose of control, the Cafeteria must remain for use of Club employees only. Any exceptions to this rule must be cleared by your department head in advance. In addition, all employees must adhere to the rules posted in the Cafeteria concerning its use. You are entitled to one meal per eight hour shift only.

B. LOCKERS

Those employees issued lockers are obligated to keep them clean and use them for storage of a change of clothing only. Lockers are not the areas for storage of valuables. Lockers are subject to inspection by management. Unauthorized materials such as alcoholic beverages, weapons, Club property and illegal drugs are prohibited. The Mar-a-Lago Club is not responsible for lost or stolen property.

C. PHONES

Employees on duty are not allowed to use the public phones in the lobbies or any guest areas. Phones are furnished outside the staff dining room for employee use.

D. LOST AND FOUND ARTICLES

You must turn in lost and found articles to your supervisor, the Security Department or a security officer at Post One.

E. GIFTS

Gifts from guests of the Club of a value exceeding \$25.00 are not to be accepted by employees of The Mar-a Lago Club unless approved in writing by the Department Head. No employee shall accept any gift from any vendor.

F. "RIGHT TO KNOW STATION,"

The Occupational Safety Hazard Administration requires all employees be provided with information of all potentially hazardous substances used in the course of our daily business. The location of these documents (Material Safety Data Sheets) is in the staff dining room on the wall adjoining the Food and Beverage office.

G. EMPLOYEE ENTRANCE AND EXIT

All employees required to log in and log out their daily time must enter and exit the building through the entrance on the east side of the house leading to Post One.

TERMINATION PROCEDURES

Clearance Process

- a. Clearance of locker.
- b. Return of uniform to Laundry.
- c. Nametag, locker key, any property keys, and uniform returned to Executive Office.
- d. Any outstanding accounts settled.

NOTE: If you abandon your job without notice, your final paycheck will not be mailed until you have returned to the Club and completed the clearance process.

IF YOU LEAVE EMPLOYMENT

RESIGNATION POLICY

When an employee decides to leave for any reason, his/her supervisor and the Human Resources Manager would like the opportunity to discuss the resignation before final action is taken. The Mar-a-Lago Club often finds during such a conversation that another alternative may be better. If, however, after full consideration the employee decides to leave, it is expected that the employee will provide the Club with a written two-week advance notice period (bear in mind that vacation days or personal days may not be included in the two-week notice period). Generally, in order to qualify for payment of earned unused vacation, the employee must work throughout the notice period. If, as sometimes happens, the employee's supervisor believes it advisable for the employee to leave prior to the end of the employee's two-weeks notice, the employee may be paid for the remainder of that period. Note: You are not entitled to be paid for any unused, accrued sick time.

DISMISSALS

Every Mar-a-Lago employee has the status of "employee-at-will", meaning that no one has a contractual right, express or implied, to remain in The Mar-a-Lago Club's employ. The Club may terminate an employee's employment, or an employee may terminate his/her employment, with or without cause, and with or without notice, at any time. No supervisor or other representative of the Club (except the owner) has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the above.

IMMEDIATE DISMISSALS - MISCONDUCT

Any employee whose conduct, actions or performance violates or conflicts with the Club's policies may be terminated immediately and without warning.

The following are some examples of grounds for immediate dismissal of an employee:

- *Breach of trust or dishonesty
- *Conviction of a felony
- *Willful violation of an established policy or rule
- *Falsification of Club records
- *Gross negligence
- *Insubordination
- *Fighting or serious breach of acceptable behavior
- *Violation of the Alcohol or Drug Policy

*Theft

*Violation of the Club's Conflict of Interest/Outside Employment Policy and/or Confidentiality Policy.

This listing is not exhaustive.

Should the employee be covered in our group health plan, all benefits will cease on the last day of the month in which the employee's last day of employment falls. The employee will then have the option to continue coverage in accordance with COBRA regulations.

In the event that the employee is asked to leave his/her employment with The Mar-a-Lago Club due to the above misconduct, the employee will not be entitled to any earned unused vacation benefits. Also, the employee will not be entitled to be paid for any unused accrued sick time.

DISMISSALS - OTHER THAN IMMEDIATE TERMINATION

All employees are expected to meet the Club's standards of work performance. Work performance encompasses many factors, including attendance, punctuality, personal conduct, job proficiency and general compliance with the Club's policies and procedures.

If an employee does not meet these standards, the Club, may, under appropriate circumstances, take corrective action, up to and including dismissal.

The intent of corrective action is to formally document problems while providing the employee with a reasonable time within which to improve performance. The process is designed to encourage development by providing employees with guidance in areas that need improvement such as poor work performance, attendance problems, personal conduct, general compliance with the Club's policies and procedures and/or other disciplinary problems.

Supervisors should use the procedure described below except in those cases which may require an employee's immediate termination.

WRITTEN WARNINGS:

The supervisor should discuss the problem and present a written warning to the employee. This should clearly identify the problem and outline a course of corrective action within a specific time frame. The employee should clearly understand both the corrective action and the consequence (i.e., termination) if the problem is not corrected or recurs. The employee should acknowledge receipt of the warning and include any additional comments of their own before signing it. A record of the discussion and the employee's comments should be placed in the employee's personnel file.

POST RESIGNATION/TERMINATION PROCEDURES

The Human Resources Manager is responsible for scheduling an exit interview with a terminating employee on the employee's last day of employment and for arranging the return of Club property including:

1. Club issued credit card
2. Club manuals
3. Office keys
4. Beeper
5. Two-way radio
6. Any additional club-owned or issued property

In order to receive a disbursement of any amounts due from the Retirement Plan, the employee is required to complete and sign a distribution form which can be obtained from the Human Resources Manager. Specific information will be provided at the exit interview.

Employees may choose the continuation of medical benefits under COBRA. Specific information will be provided by the Human Resources Manager at the exit interview.

Benefits (Life and Medical) end on the last day of the month in which the employee's last day of employment falls. An employee has the option to continue Medical Benefits in accordance with The Consolidated Omnibus Budget Reconciliation Act ("COBRA") regulations.

Employees leaving the Club must return office keys, club credit cards, etc., before their final paycheck can be issued. This final paycheck will be mailed during the next normal pay period. If there are unpaid obligations to the Club, the final paycheck will reflect the appropriate deductions.

VACATION PAY

Vacation pay is calculated in accordance with our vacation policy. If the employee took more vacation days than he/she was entitled to under the vacation policy, the time will be deducted from the employees final paycheck.

RETIREMENT PLAN

If an employee is in the retirement plan, information regarding this plan will be provided at the exit interview.

EMPLOYEE HANDBOOK RECEIPT

INSTRUCTIONS: PLEASE READ THIS PERSONNEL POLICIES AND PROCEDURES EMPLOYEE HANDBOOK CAREFULLY. IF YOU DO NOT UNDERSTAND ANY PORTION OF IT, ASK FOR AN EXPLANATION FROM THE CLUB MANAGER'S OFFICE. RETURN THIS SIGNED RECEIPT TO THE CLUB MANAGER'S OFFICE IMMEDIATELY AFTER YOU HAVE RECEIVED THIS MANUAL. PLEASE KEEP THE HANDBOOK FOR FUTURE REFERENCE.

I received the Policy Manual of The Mar-A-Lago Club, L.C. on the date indicated below. I will carefully read the policies, procedures, and other information contained in the Manual and will ask the Club Manager's office for an explanation if I do not fully understand them. I agree as a condition of my employment to comply with the policies and procedures which exist now or which may come into existence in the future. I understand that if I do not comply with the policies and procedures, I may be subject to disciplinary action. I also understand that I or the Club may terminate employment at any time, for any reason.

The Club reserves the right to modify or terminate any policies or procedures, in whole or in part, at any time, with or without notice. I understand that only the Managing Director is authorized to set policy or make any promises with respect to my employment. The language used in this Handbook is not intended to create, nor is it to be construed to constitute, a contract between the Club and any one or all of its employees.

Date

Employee's Name

Employee's Signature

159816

MAR-A-LAGO 0243

EXHIBIT V

Vicki Yawnick:

Please run the following this Saturday October 14 and Sunday October 15:

THE MAR-A-LAGO CLUB

Private Club in Palm Beach now seeking qualified individuals for the following seasonal positions:

- *Wait Staff**
- *Asst. Food Server**
- *Banquet Servers**
- *P.M Sous Chef**
- *Asst. Banquet Chef**
- *Line Cooks**
- *Pastry Cooks**
- *Steward**
- *Dishwashers**
- *Housekeepers- 11pm-3am**
- *Houseperson – 11 pm-3am**
- *Valet – must have a clean driving record.**
- *Salon Asst.**
- *Nail Technician**
- *Make-Up Artist – Part Time**
- *License Massage Therapist-must have experience in wet treatments.**
- *Esthetician**
- *Spa Attendants – College students encourage to apply.**

Call Carol Ash, M-F, 9am-5pm,
(561) 833-8767, ext. 313 or fax
resume to (561) 832-2194.
Drug/Smoke Free Workplace. EOE

EXHIBIT 18
Giuffre
AGREN BLANDO REPORTING
10-14-16

MAR-A-LAGO 0086

EXHIBIT W

APPLICATION FOR EMPLOYMENT

PRE-EMPLOYMENT QUESTIONNAIRE

EQUAL OPPORTUNITY EMPLOYER

PERSONAL INFORMATION

NAME (LAST NAME FIRST) **Roberts Virginia L**

CITY **Loxahatchee** STATE **FL** ZIP CODE **33470**

PHONE NO. **(261) 796-1519** REFERRED BY **Michelle, Stacey, & Mr. Pinkwasser**

EMPLOYMENT DESIRED

POSITION **Reception / animal help** DATE YOU CAN START **A.S.A.P** SALARY DESIRED **negotiable**

ARE YOU EMPLOYED? ☒ YES ☐ NO IF SO, MAY WE INQUIRE OF YOUR PRESENT EMPLOYER? ☒ YES ☐ NO

EVER APPLIED TO THIS COMPANY BEFORE? ☐ YES ☒ NO WHERE? WHEN?

EDUCATION HISTORY

NAME & LOCATION OF SCHOOL	YEARS ATTENDED	DID YOU GRADUATE?	SUBJECTS STUDIED
GRAMMAR SCHOOL			
HIGH SCHOOL	Survivors Charter	4	yes
COLLEGE			high school Diploma
TRADE, BUSINESS OR CORRESPONDENCE SCHOOL			

GENERAL INFORMATION

SUBJECTS OF SPECIAL STUDY, RESEARCH WORK OR SPECIAL TRAINING/SKILLS

I enjoy being around & helping animals, when I was younger I volunteered for 16 years at Vincennes Riding clinic, learning about animals

U.S. MILITARY OR NAVAL SERVICE RANK

FORMER EMPLOYERS (LIST BELOW LAST FOUR EMPLOYERS, STARTING WITH LAST ONE FIRST)

DATE MONTH AND YEAR	NAME & ADDRESS OF EMPLOYER	SALARY	POSITION	REASON FOR LEAVING
FROM 1-02 TO 3-26-02	T.G.I.F.	2.15 + Tips	Server	Didn't leave
FROM 1-01 TO 1-02	MASSAGE Therapy	hourly	Training masseuse	my Trainer got ill
FROM 4-02 TO 1-01	Lookuburg nest	8.50	Bird manager	School for Massage
FROM 7-08 TO 4-09	N.B.R.C.	9.25	Bird caretaker	Too long of Days

Adams 9861
APR 1998

APPLICATION FOR EMPLOYMENT

CONTINUED ON OTHER SIDE

EXHIBIT

9

GIUFFRE009201
CONFIDENTIAL

AGREN BLANDO REPORTING

11-14-10

REFERENCES GIVE BELOW THE NAMES OF THREE PERSONS NOT RELATED TO YOU, WHOM YOU HAVE KNOWN AT LEAST ONE YEAR

NAME	ADDRESS	BUSINESS	YEARS KNOWN
Mara Figueroa		Food	2
Bob Pavlik		Food delivery	5
Anthony Richards		Cashier	1 1/2

AUTHORIZATION

"I certify that the facts contained in this application are true and complete to the best of my knowledge and understand that, if employed, falsified statements on this application shall be grounds for dismissal.

I authorize investigation of all statements contained herein and the references and employers listed above to give you any and all information concerning my previous employment and any pertinent information they may have, personal or otherwise, and release the company from all liability for any damage that may result from utilization of such information.

I also understand and agree that no representative of the company has any authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the foregoing, unless it is in writing and signed by an authorized company representative.

This waiver does not permit the release or use of disability-related or medical information in a manner prohibited by the Americans with Disabilities Act (ADA) and other relevant federal and state laws."

DATE 3-26-02 SIGNATURE Virginia Roberts

INTERVIEWED BY _____ DATE _____

DO NOT WRITE BELOW THIS LINE

REMARKS

Unfil 3 PM	
Very noisy, fluffy	EXCUSES:
Repeatedly set off alarm in office	- ENGINE FELL OUT
Absence issues	- BROKEN AXEE
Failure to perform	- STUFF SET ON FIRE
Suspect drugs	
call in sick, late	

NEATNESS		CHARACTER		
PERSONALITY		ABILITY		
HIRED	FOR DEPT.	POSITION	WILL REPORT	SALARY WAGES

APPROVED: 1. _____ EMPLOYMENT MANAGER 2. _____ DEPARTMENT HEAD 3. _____ GENERAL MANAGER

This application for employment is sold only for general use throughout the United States. Adams assumes no responsibility and hereby disclaims any liability for the inclusion in this form of any questions or requests for information upon which a violation of local, state and/or federal law may be based. It is the user's responsibility to ensure that this form's use complies with applicable laws, which change from time to time.

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Monday, November 7, 2016
 1 Quicken Data - All Accounts

Page: 1

QuickReport by Description

8/12/69 through 1/29/03

Date	Account	Num	Payee	Memo	Category	Clr
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		<i>split</i>	R
5/6/02	Courtyard Animal Hospital	1522	VOIDVirginia Roberts			R
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		<i>split</i>	R
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		<i>split</i>	R
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		<i>split</i>	R

Total 8/12/69 - 1/29/03

Total Inflows
 Total Outflows

Net Total

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Monday, November 7, 2016
1 Quicken Data - All Accounts

Page: 2

QuickReport by Description
8/12/69 through 1/29/03

Amount

-407.68
0.00
-380.35
-325.16
-156.08
-1,269.27

0.00
-1,269.27

-1,269.27

GIUFFRE009204
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Monday, November 7, 2016
1 Quicken Data - All Accounts

Page: 1

Category Detail Report

4/1/02 through 7/1/02

Date	Account	Num	Payee	Memo	Category	Clr	Amount
Income/Expenses							
Expenses							
Salary							
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		Salary	R	-507.50
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		Salary	R	-472.50
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		Salary	R	-399.75
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		Salary	R	-182.00
Total Salary							-1,561.75
Taxes:							
Social security							
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		Taxes:Social security	R	38.82
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		Taxes:Social security	R	36.15
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		Taxes:Social security	R	30.59
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		Taxes:Social security	R	13.92
Total Social security							119.48
Withholding							
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		Taxes:Withholding	R	61.00
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		Taxes:Withholding	R	56.00
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		Taxes:Withholding	R	44.00
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		Taxes:Withholding	R	12.00
Total Withholding							173.00
Total Taxes							292.48
Expenses - Other							
5/6/02	Courtyard Animal Hospital	1522	VOIDvirginia Roberts			R	0.00
Total Expenses - Other							0.00
Total Expenses							-1,269.27
Total Income/Expenses							-1,269.27

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April 2002 Payroll

		Paycheck 1	Paycheck 2	Paycheck 3	Total
[REDACTED]	Social Security Withholding	\$ [REDACTED] \$ [REDACTED]	\$ [REDACTED] \$ [REDACTED]		\$ [REDACTED] \$ [REDACTED]
[REDACTED]	Social Security Withholding	\$ [REDACTED] \$ [REDACTED]	\$ [REDACTED] \$ [REDACTED]		\$ [REDACTED] \$ [REDACTED]
[REDACTED]	Social Security Withholding	\$ [REDACTED] \$ [REDACTED]	\$ [REDACTED] \$ [REDACTED]		\$ [REDACTED] \$ [REDACTED]
[REDACTED]	Social Security Withholding	\$ [REDACTED] \$ [REDACTED]	\$ [REDACTED] \$ [REDACTED]		\$ [REDACTED] \$ [REDACTED]
Jenna	Social Security Withholding		\$ 38.82 \$ 61.00		\$ 38.82 \$ 61.00
[REDACTED]	Social Security Withholding		\$ [REDACTED] \$ [REDACTED]		\$ [REDACTED] \$ [REDACTED]

Monthly Totals

Social Security Withholding

\$ [REDACTED]
\$ [REDACTED]

x2=

\$ [REDACTED]
\$ [REDACTED]

Total Liability

\$ [REDACTED]

May 2002 Payroll

		Paycheck 1	Paycheck 2	Paycheck 3	Total
[REDACTED]	Social Security Withholding	\$ [REDACTED] \$ [REDACTED]	\$ [REDACTED] \$ [REDACTED]	\$ [REDACTED] \$ [REDACTED]	\$ [REDACTED] \$ [REDACTED]
[REDACTED]	Social Security Withholding	\$ [REDACTED] \$ [REDACTED]	\$ [REDACTED] \$ [REDACTED]		\$ [REDACTED] \$ [REDACTED]
[REDACTED]	Social Security Withholding	\$ [REDACTED] \$ [REDACTED]	\$ [REDACTED] \$ [REDACTED]		\$ [REDACTED] \$ [REDACTED]
[REDACTED]	Social Security Withholding	\$ [REDACTED] \$ [REDACTED]			\$ [REDACTED] \$ [REDACTED]
Jenna	Social Security Withholding	\$ 36.15 \$ 56.00	\$ 30.59 \$ 44.00		\$ 66.74 \$ 100.00
[REDACTED]	Social Security Withholding				\$ - \$ -

Monthly Totals

Social Security Withholding

\$ [REDACTED] x2=

\$ [REDACTED]4
\$ [REDACTED]

Total Liability

\$ [REDACTED]

June 2002 Payroll

		Paycheck 1	Paycheck 2	Paycheck 3	Total
	Salary				\$
	Social Security	\$	\$	\$	\$
	Withholding	\$	\$	\$	\$
	Salary	\$	\$		\$
	Social Security	\$	\$		\$
	Withholding	\$	\$		\$
	Salary	\$	\$		\$
	Social Security	\$	\$		\$
	Withholding	\$	\$		\$
	Salary				\$
	Social Security				\$
	Withholding	\$ -			\$ -
Jenna	Salary	\$ 182.00			\$ 182.00
	Social Security	\$ 13.92	\$ -		\$ 13.92
	Withholding	\$ 12.00	\$ -		\$ 12.00
	Salary				\$ -
	Social Security				\$ -
	Withholding				\$ -

Monthly Totals

Salary

Social Security

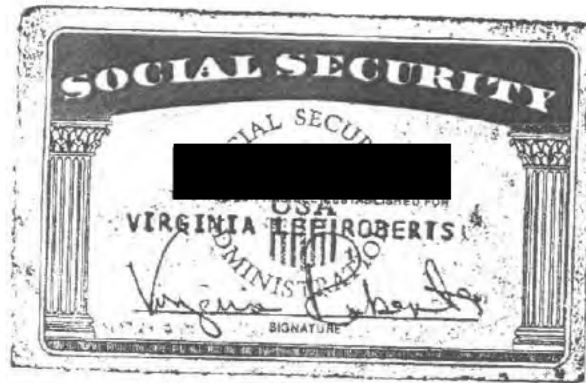
Withholding

\$ x2=

\$

Total Liability

\$



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25/29/2001 13:12 3055533543

ALLEN SHAPPE

PAGE 01

Form W-4 (2001)

Purpose. Complete Form W-4 so your employer can withhold the correct Federal income tax from your pay. Because your tax situation may change, you may want to refigure your withholding each year.

Exemption from withholding. If you are exempt, complete only lines 1, 2, 3, 4, and 7, and sign the form to validate it. Your exemption for 2001 expires February 18, 2002.

Notes: You cannot claim exemption from withholding if (1) your income exceeds \$750 and includes more than \$250 of unearned income (e.g., interest and dividends) and (2) another person can claim you as a dependent on their tax return.

Basic instructions. If you are not exempt, complete the **Personal Allowances Worksheet** below. The worksheets on page 2 adjust your withholding allowances based on itemized deductions, certain credits, adjustments to

income, or two-earner/two-job situations. Complete all worksheets that apply. They will help you figure the number of withholding allowances you are entitled to claim. However, you may claim fewer (or zero) allowances.

Head of household. Generally, you may claim head of household filing status on your tax return only if you are unmarried and pay more than 50% of the costs of keeping up a home for yourself and your dependent(s) or other qualifying individuals. See line E below.

Tax credits. You can take projected tax credits into account in figuring your allowable number of withholding allowances. Credits for child or dependent care expenses and the child tax credit may be claimed using the **Personal Allowances Worksheet** below. See Pub. 918, *How Do I Adjust My Tax Withholding?* for information on converting your other credits into withholding allowances.

Nonwage income. If you have a large amount of nonwage income, such as interest or dividends,

consider making estimated tax payments using Form 1040-ES, *Estimated Tax for Individuals*. Otherwise, you may owe additional tax.

Two earners/two jobs. If you have a working spouse or more than one job, figure the total number of allowances you are entitled to claim on all jobs using worksheets from only one Form W-4. Your withholding usually will be most accurate when all allowances are claimed on the Form W-4 for the highest paying job and zero allowances are claimed on the others.

Check your withholding. After your Form W-4 takes effect, use Pub. 919 to see how the dollar amount you are having withheld compares to your projected total tax for 2001. Get Pub. 919 especially if you used the **Two-Earner/Two-Job Worksheet** on page 2 and your earnings exceed \$160,000 (Single) or \$200,000 (Married).

Recent name change? If your name on line 1 differs from that shown on your social security card, call 1-800-772-1213 for a new social security card.

Personal Allowances Worksheet (Keep for your records.)

A Enter "1" for yourself if no one else can claim you as a dependent	A <u>1</u>
B Enter "1" if: <ul style="list-style-type: none"> • You are single and have only one job; or • You are married, have only one job, and your spouse does not work; or • Your wages from a second job or your spouse's wages (or the total of both) are \$1,000 or less. 	B <u>1</u>
C Enter "1" for your spouse. But, you may choose to enter "-0-" if you are married and have either a working spouse or more than one job. (Entering "-0-" may help you avoid having too little tax withheld.)	C <u>0</u>
D Enter number of dependents (other than your spouse or yourself) you will claim on your tax return	D <u>0</u>
E Enter "1" if you will file as head of household on your tax return (see conditions under Head of household above)	E <u>0</u>
F Enter "1" if you have at least \$1,500 of child or dependent care expenses for which you plan to claim a credit (Note: Do not include child support payments. See Pub. 603, <i>Child and Dependent Care Expenses</i> , for details.)	F <u>0</u>
G Child Tax Credit (including additional child tax credit): <ul style="list-style-type: none"> • If your total income will be between \$18,000 and \$50,000 (\$23,000 and \$63,000 if married), enter "1" for each eligible child. • If your total income will be between \$50,000 and \$80,000 (\$63,000 and \$115,000 if married), enter "1" if you have two eligible children, enter "2" if you have three or four eligible children, or enter "3" if you have five or more eligible children. 	G <u>0</u>
H Add lines A through G and enter total here. (Note: This may be different from the number of exemptions you claim on your tax return.)	H <u>2</u>

For accuracy, complete all worksheets that apply.

- If you plan to itemize or claim adjustments to income and want to reduce your withholding, see the **Deductions and Adjustments Worksheet** on page 2.
- If you are single, have more than one job and your combined earnings from all jobs exceed \$35,000, or if you are married and have a working spouse or more than one job and the combined earnings from all jobs exceed \$60,000, see the **Two-Earner/Two-Job Worksheet** on page 2 to avoid having too little tax withheld.
- If neither of the above situations applies, stop here and enter the number from line H on line 6 of Form W-4 below.

Cut here and give Form W-4 to your employer. Keep the top part for your records.

Form W-4 Department of the Treasury Internal Revenue Service		Employee's Withholding Allowance Certificate ▶ For Privacy Act and Paperwork Reduction Act Notice, see page 2.		OMB No. 1545-0010 2001
1 Type or print your first name and middle initial		Last name		
Virginia L		Robert S		
Home address (number and street or rural route)		3 <input checked="" type="checkbox"/> Single <input type="checkbox"/> Married <input type="checkbox"/> Married, but withhold at higher Single rate. Note: If married, but legally separated, or spouse is a nonresident alien, check the Single box.		
City or town, state, and ZIP code		4 If your last name differs from that on your social security card, check here. You must call 1-800-772-1213 for a new card. <input type="checkbox"/>		
Durham, NC 27706				
5 Total number of allowances you are claiming (from line H above or from the applicable worksheet on page 2)		6 Additional amount, if any, you want withheld from each paycheck		
2		0 \$ 0 -		
7 I claim exemption from withholding for 2001, and I certify that I meet both of the following conditions for exemption:				
• Last year I had a right to a refund of all Federal income tax withheld because I had no tax liability and • This year I expect a refund of all Federal income tax withheld because I expect to have no tax liability.				
If you meet both conditions, write "Exempt" here ▶ <u>7</u>				
Under penalties of perjury, I certify that I am entitled to the number of withholding allowances claimed on this certificate, or I am entitled to claim exempt status.				
Employee's signature (Form is not valid unless you sign it) ▶		Date ▶		
Virginia Robert S		5/16/02		
8 Employer's name and address (Employer: Complete lines 8 and 10 only if sending to the IRS.)		9 Office code (optional)		10 Employer identification number

Cat. No. 102200

GIUFFRE009210
CONFIDENTIAL


**Courtyard Animal Hospital
13860-31 Wellington Trace
Wellington, FL 33414
(561) 784-7387**

Ms. Roberts (jenna),

It is obvious that you have a number of personal issues going on that need your immediate attention and keep you from being able to focus on and perform the material duties of your job here at Courtyard Animal Hospital.

In the short time you have been employed here, you have missed multiple days, arrived late, called in sick multiple times. The reasoning you have given has shown that you are "distracted" at minimum. Between your "engine falling out of your car, your axle breaking off which your boyfriend 'repaired it roadside' and your landlord tossing all your furniture and clothing out in the front yard and setting it on fire", it is clear that you have more pressing issues in your life to focus on. You have been unable to perform to an acceptable standard within our company.

It is because of your inability to perform your duties here, be in attendance when scheduled and focus on the job requirements that we are forced to terminate your employment.



Dr. Pinkwasser

**GIUFFRE009211
CONFIDENTIAL**

EXHIBIT X

 Date: 4/25/16 ROYAL PALM BEACH POLICE DEPARTMENT Page: 1
 Time: 8:52:02 Offense Report Program: CMS301L

Day Of Week . : Sunday Report Date . : 6/10/01 21:25
 Occur From Date: 6/10/01 21:00 Occur To Date : 6/10/01 21:05
 Dept Class . . : BURGLARY - Non-Vehicle
 Street Number : [REDACTED]
 City : ROYAL PALM BEACH, FL 33411
 Zone/division : Zone One (1) (No of Okee)
 Location Type : APARTMENT/CONDO Case Status . : EXCEPTIONALLY CLEARED
 Report Officer : WOOD, FRANK Supervisory Emp: HUGHES, THOMAS 6/17/01
 Case Status Dt : 8/21/01

***** C A S E M A N A G E M E N T I N F O R M A T I O N *****
 Case Number . : 1-01-002214 Dept Class . . : BURGLARY - Non-Vehicle
 Case Status . : EXCEPTIONALLY CLEARED Case Status Dt : 8/21/01
 Investigator . : KACZOR, K.

ASSIGNMENT HISTORY

Case Number . : 1-01-002214 Dept Unit . . : DETECTIVE
 Investigator . : KACZOR, KENNETH Supervisor . . : ROBKin, ROBERT
 Assignment Date: 6/19/01

***** O F F E N S E R E P O R T # 1 *****
 State Class . : Burglary - Non-Vehicle
 Attmpt/Committ : Committed Statute/Ordin : 810.02(4B)
 Forced Entry . : Yes Premises Enter : 1
 Structure Occup: Unoccupied

***** O F F E N S E R E P O R T # 2 *****
 State Class . : Assault Simple Attmpt/Committ : Committed
 Statute/Ordin : 784.03(1A) Weapon Type . : Hands/Fists/Feet

***** O F F E N S E P R I M A R Y R E L A T I O N S H I P S *****
 Offense #: 001 Burglary - Non-Vehicle / / 810.02(4B)
 Name #...: 001 (SUSP) UNKNOWN,
 Name #...: 001 (VICT) AUSTRICH, JAMES M.
 Offense #: 002 Assault Simple / / 784.03(1A)
 Name #...: 001 (SUSP) UNKNOWN,
 Name #...: 001 (VICT) AUSTRICH, JAMES M.

***** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 1 **
 Case Number . : 1-01-002214 Prompt valid in: UNKNOWN,
 City : ROYAL PALM BEACH, FL 33411
 Home Phone No. : 561/000-0000 Business Phone : 561/000-0000
 Race : Unknown Sex : Unknown
 Ethnic Origin : Hispanic

***** W I T N E S S I N F O R M A T I O N - # 1 *****
 Case Number . : 1-01-002214 Last Name . . : PERKINS JR, JOHN MARTIN
 Street Number : [REDACTED]
 City : ROYAL PALM BEACH, FL 33411
 County : PALM BEACH Home Phone No. : [REDACTED]
 Business Phone : [REDACTED] Birth Date . . : [REDACTED]
 Birth Country : Unknown
 Oper Lic No. . : [REDACTED] FL United States
 Race : White Sex : Male

CERTIFIED
 TO BE A TRUE COPY
 RIC L. BRADSHAW, SHERIFF
 GM_00780

Date: 4/25/16
Time: 8:52:02

ROYAL PALM BEACH POLICE DEPARTMENT
Offense Report

Page: 2
Program: CMS301L

1-01-002214 (Continued)

Ethnic Origin : WHITE

***** V I C T I M I N F O R M A T I O N - # 1 *****

Case Number : 1-01-002214 Prompt valid in: AUSTRICH, JAMES MICHAEL
Street Number : [REDACTED]
City : ROYAL PALM BEACH, FL 33411
County : PALM BEACH Home Phone No. : [REDACTED]
Business Phone : 561/000-0000 Birth Date : [REDACTED]
Birth Country : Unknown Oper Lic Cntry : Unknown
Race : White Sex : Male
Ethnic Origin : WHITE Victim Type : Adult

***** O T H E R P E R S O N I N F O R M A T I O N - # 1 *****

Case Number : 1-01-002214 Last Name : ROBERTS, VIRGINIA L
Person Type : OTHER PERSON
Street Number : 368 BENT OAK DR
City : ROYAL PALM BEACH, FL 33411
County : PALM BEACH Home Phone No. : [REDACTED]
Business Phone : 561/714-5252 Birth Date : [REDACTED]
Birth Country : Unknown Oper Lic Cntry : Unknown
Race : White Sex : Female
Ethnic Origin : WHITE Height : 506
Weight : 103

***** N A R R A T I V E # 1 *****

Original Report Reported By: WOOD, FRANK T. 6/10/01
Entered By: JARRETT, DAWN M. 6/21/01

ON SUNDAY, JUNE 10, 2001 AT APPROXIMATELY 2124 HOURS, I RESPONDED TO [REDACTED], ROYAL PALM BEACH, FLORIDA IN REFERENCE TO A BATTERY COMPLAINT. UPON MY ARRIVAL I MET WITH THE VICTIM JAMES MICHAEL AUSTRICH. [REDACTED] AUSTRICH STATED THAT HIS EX-FIANCÉE VIRGINIA ROBERTS, WHO ALSO RESIDES AT THE ABOVE LISTED ADDRESS, BROUGHT HER FRIEND ANTHONY TO THE APARTMENT. AUSTRICH AND UNKNOWN SUSPECT ANTHONY DIDN'T GET ALONG. THE SUSPECT THEN BECAME VERBALLY ABUSIVE TO AUSTRICH. AUSTRICH THEN TOLD ANTHONY TO LEAVE THE APARTMENT. ANTHONY THEN BECAME AGITATED AND AGAIN AUSTRICH TOLD HIM TO LEAVE. AUSTRICH'S FRIEND JOHN PERKINS WAS PRESENT DURING THE ALTERCATION AND STATED IN A SWORN WRITTEN STATEMENT THAT HE ALSO TOLD ANTHONY TO LEAVE THE APARTMENT. PERKINS WAS IN FEAR THAT AUSTRICH AND ANTHONY WERE GOING TO FIGHT. ANTHONY FINALLY LEFT THE APARTMENT. AUSTRICH GOT THE APARTMENT DOOR CLOSED ANTHONY THEN REOPENED THE DOOR AND ENTERED THE APARTMENT WITHOUT AUSTRICH'S PERMISSION, AND PUNCHED AUSTRICH ON THE LEFT SIDE OF HIS FACE WITH A CLOSED FIST CAUSING MINOR SWELLING AND A LARGE RED MARK. PERKINS THEN WENT TO THE TELEPHONE AND CALLED POLICE. ANTHONY OBSERVED PERKINS ON THE TELEPHONE AND FLED THE SCENE PRIOR TO MY ARRIVAL.

AUSTRICH ALSO PROVIDED ME WITH A SWORN WRITTEN STATEMENT. I ASKED AUSTRICH IF HE NEEDED MEDICAL TREATMENT? AUSTRICH VERBALLY STATED THAT HE DID NOT NEED ANY MEDICAL TREATMENT.

CERTIFIED
TO BE A TRUE COPY
RIC L. BRADSHAW, SHERIFF

GM_00781

Date: 4/25/16 ROYAL PALM BEACH POLICE DEPARTMENT Page: 3
Time: 8:52:02 Offense Report Program: CMS301L

1-01-002214 (Continued)

***** N A R R A T I V E # 2 *****
SUPPLEMENT Reported By: WOOD, FRANK T. 6/16/01
Entered By.: JARRETT, DAWN M. 6/21/01

SINCE 6/10/01 NUMEROUS ATTEMPTS BY TELEPHONE AND IN PERSON HAVE
BEEN MADE TO GET MORE SUSPECT INFORMATION. NOR JAMES AUSTRICH, JOHN
PERKINS, AND OR VIRGINIA ROBERTS HAVE BEEN AT THE RESIDENCE OR
ANSWERING MY TELEPHONE MESSAGES, AT THIS TIME I WISH CLASSIFY THIS
CASE AS INACTIVE DUE TO SUSPECTS LACK OF COOPERATION.

***** N A R R A T I V E # 3 *****
SUPPLEMENT Reported By: KACZOR, KENNETH A. 8/14/01
Entered By.: KACZOR, KENNETH A. 8/14/01
Reviewed By: PERVENECKI, DAVID A. 8/21/01

I have attempted contact with the victim numerous times and have been
unsuccessful. Messages left with roommates have been ignored and the
victim has refused to call me regarding this case. This case is
exceptionally cleared due to the victim's lack of cooperation.

* * * * * E N D O F R E P O R T * * * * *

CERTIFIED
TO BE A TRUE COPY
RIC L. BRADSHAW, SHERIFF

GM_00782

EXHIBIT Y

CBTS Number _____ Agency ORI Number FLO 5 0 2 8 0 0 Charge Type: <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 6. Other _____		PROBABLE CAUSE AFFIDAVIT 1. Arrest 3. Request for Warrant 2. N. 4. Request for Copies <div style="border: 1px solid black; padding: 2px; display: inline-block;">1</div> Juvenile <input checked="" type="checkbox"/>	
Agency Name ROYAL PALM BEACH POLICE DEPARTMENT		Agency Report Number 8,6 - 9 9, 3, 0, 4, 6	
Name (Last, First, Middle) FIGUEROA, ANTHONY		Race W Sex M Date of Birth _____	
Charge Description POSS OF MARIJUANA OVER 20 GRAMS		Charge Description POSS. WITH INTENT TO SELL	
Charge Description POSS OF DRUG PARAPHERNALIA		Charge Description POSS OF CONTROLLED SUBSTANCE	
Victim's Name (Last, First, Middle) STATE OF FLORIDA		Race _____ Sex _____ Date of Birth _____	
Local Address (Street, Apt., Number) _____ (City) _____ (State) _____ (zip) _____ Phone _____		Address Source _____	
Business Address (Name, Street) _____ (City) _____ (State) _____ (zip) _____ Phone _____		Occupation _____	
The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. The Person taken into custody ... <input checked="" type="checkbox"/> committed the below acts in my presence. <input type="checkbox"/> was observed by _____ who told _____ <input type="checkbox"/> confessed to _____ that he/she saw the arrested person commit the below acts. <input type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.			
On the <u>19TH</u> day of <u>NOVEMBER</u> 19 <u>99</u> at <u>5:00</u> <input type="checkbox"/> A.M. <input checked="" type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)			
THE ROYAL PALM BEACH POLICE DEPARTMENT WITH MUTUAL AID FROM THE LAKE WORTH POLICE DEPARTMENT, PERFORMED A SEARCH WARRANT AT _____ PRESENT INSIDE THE _____ RESIDENCE WAS ANTHONY FIGUEROA, _____ ALL OCCUPANTS WERE READ THEIR MIRANDA RIGHTS BY OFFICER HECKLER (#115). THE SEARCH OF THIS RESIDENCE REVEALED THE FOLLOWING: INSIDE ANTHONY FIGUEROA'S BEDROOM (NORTHWEST BEDROOM) WAS APPROX 106 GRAMS OF SUSPECT MARIJUANA HIDDEN INSIDE A CAMOUFLAGE BAG, NEXT HIS BED ON THE BOTTOM SHELVE OF A BOOK RACK. THIS SUSPECT MARIJUANA WAS INDIVIDUALLY WRAPPED IN PLASTIC 12 BAGS, PACKAGE FOR SALE. LOCATED IN ANOTHER BOOK SHELVE WAS A SMALL PILL BOX WHICH ACCORDING TO ANTHONY FIGUEROA WAS "X-TASY" OR MDMA, WHICH IS A CONTROLLED SUBSTANCE. THROUGHOUT ANTHONY FIGUEROA'S BEDROOM WERE NUMEROUS USED NOS CANISTERS, A GLASS SMOKING PIPE, A BLACK BOX CONTAINING CRUSHED CIGARS INTERNALS, BALLOONS FOR "HUFFING", ALONG WITH POSTERS THAT CONTAINED MARIJUANA PLANTS AND DRUG REFERENCES. ALSO LOCATED IN THE BOOK SHELVE WERE PHOTOS NEGATIVES OF ANTHONY FIGUEROA SMOKING FROM A LARGE "BONG". WHEN LAKE WORTH POLICE ENTERED _____, THEY DISCOVERED ANTHONY FIGUEROA INSIDE THE COMMON BATHROOM. A SEARCH OF THIS BATHROOM BY OFC. STRONG REVEALED A PLASTIC BAG CONTAINING 16 GMS OF SUSPECT MARIJUANA HIDDEN BETWEEN TWO TOWELS IN THE CLOSET. JUVENILE REFERRAL WAS ISSUED TO THE PARENT. NOTHING FURTHER.			
STATE OF FLORIDA - PALM BEACH COUNTY I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law. THIS <u>8</u> DAY OF <u>Aug</u> 20 <u>19</u> SHARON R. BOCK CLERK & COMPTROLLER By <u>[Signature]</u> DEPUTY CLERK SIGNATURE OF ARRESTING / INVESTIGATING OFFICER OFC. SEARING NAME OF OFFICER (PLEASE PRINT) 11-19-99 DATE			
SWORN AND SUBSCRIBED BEFORE ME <u>[Signature]</u> NOTARY PUBLIC / CLERK OF COURT / POLICE OFFICER 11-19-99 DATE			
DISTRIBUTION: WHITE - Court Copy GREEN - State Attorney YELLOW - Agency PINK - Agency GOLDENROB -			

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION W

ORIGINAL

CASE NO. 00-4937CF AOA
ISSUE WARRANT

STATE OF FLORIDA

vs.

ANTHONY LUIS FIGUEROA, W/M [REDACTED] [REDACTED]

DOROTHY H. WILKIN, CLERK
CIR. & CO. CLS. P.B. CO. FL
CIRCUIT CRIMINAL

00 MAY -4 PM 1:11

FILED

INFORMATION FOR:

- 1) POSSESSION OF SCHEDULE I SUBSTANCE
- 2) POSSESSION OF MARIJUANA IN EXCESS OF 20 GRAMS
- 3) POSSESSION OF PARAPHERNALIA (PRODUCTION)
- 4) POSSESSION OF PARAPHERNALIA (USE)

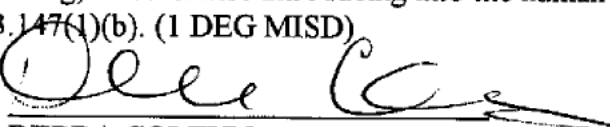
In the Name and by Authority of the State of Florida:

BARRY E. KRISCHER, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that ANTHONY LUIS FIGUEROA on or about November 19, 1999, in the County of Palm Beach and State of Florida, was unlawfully and knowingly in actual or constructive possession of a substance classified within Schedule I, Florida Statute 893.03(4), commonly known as MDMA, a controlled substance, contrary to Florida Statute 893.13(6)(a). (3 DEG FEL)

COUNT 2: Informant aforesaid, under oath, further information makes that ANTHONY LUIS FIGUEROA on or about November 19, 1999, in the County of Palm Beach and State of Florida, was unlawfully and knowingly in actual or constructive possession of more than 20 grams of a material, compound, mixture or preparation which contained cannabis, commonly known as marijuana, a controlled substance, contrary to Florida Statute 893.13(6)(a). (3 DEG FEL)

COUNT 3: Informant aforesaid, under oath, further information makes that ANTHONY LUIS FIGUEROA on or about November 19, 1999, in the County of Palm Beach and State of Florida, was unlawfully and knowingly in actual or constructive possession of bags, and/or a pill box, and/or a box, which was drug paraphernalia being used, intended for use, or designed for use in planting, propagating, cultivating, growing, harvesting, manufacturing, compounding, converting, producing, processing, preparing, testing, analyzing, packaging, repackaging, storing, containing or concealing a controlled substance, contrary to Florida Statute 893.147(1)(a). (1 DEG MISD)

COUNT 4: Informant aforesaid, under oath, further information makes that ANTHONY LUIS FIGUEROA on or about November 19, 1999, in the County of Palm Beach and State of Florida, was unlawfully and knowingly in actual or constructive possession of a pipe, and/or balloons, which was drug paraphernalia being used, intended for use, or designed for use in injecting, ingesting, inhaling, or otherwise introducing into the human body a controlled substance, contrary to Florida Statute 893.147(1)(b). (1 DEG MISD)


DEBRA COLTUN
FL. BAR NO. 0561622
Assistant State Attorney
Palm Beach County, Florida

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, DEBRA COLTUN Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.



Assistant State Attorney

Sworn to and subscribed to before me this 2 day of ^{MAY}~~April~~, 2000.


NOTARY PUBLIC, State of Florida

Citation Nos. (if applicable) ; ; ;



Elida Pasharikov
MY COMMISSION # 00643308 EXPIRES
April 28, 2011
BONDED THRU TROY PAIN INSURANCE, INC.



STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any as required by law.

THIS 8 DAY OF Aug, 2016

SHARON R. BOSK
CLERK & COMPTROLLER

By 
DEPUTY CLERK

(Probation) Community Control Violator)

(As to Count(s)) 1

OBTS Number HY H. WILKEN, CLERK

The Defendant, being personally before this Court, accompanied by the defendant's attorney of record, T. Williams, and having been adjudicated guilty herein, and the Court having given the Defendant an opportunity to be heard and to offer matters in mitigation of sentence, and to show cause why defendant should not be sentenced as provided by law, and no cause being shown, and the Court having placed the Defendant on probation/community control and having subsequently revoked the Defendant's probation/community control for violation(s) of condition(s) 5.

The Defendant pay a fine of \$ 0 pursuant to § , Fla. Stat., plus \$ as the 5% surcharge (of the fine imposed) required by F.S. 960-25, which shall be deposited in the Crimes Compensation Trust Fund.

[] Department of Corrections
[] Sheriff of Palm Beach County, Florida

for a term of 30 DAYS. It is further ordered that the Defendant shall be allowed a total of 3 days as credit for time incarcerated prior to imposition of this sentence. It is further ordered that the composite term of all sentences imposed for the counts specified in the order shall run

☒ consecutive to ☒ concurrent with (check one) the following:
☒ Any active sentence being served.
☐ Specific sentences: _____

In the event the above sentence is to the Department of Corrections, the Sheriff of Palm Beach County, Florida is hereby ordered and directed to deliver the Defendant to the Department of Corrections together with a copy of the Judgment and Sentence, and any other documents specified by Florida Statute.

The defendant in open court was advised of right to appeal from this Sentence by filing notice of appeal within thirty days from this date with the Clerk of the Court, and the Defendant's right to the assistance of counsel in taking said appeal at the expense of the state upon showing of indigency.

DONE AND ORDERED in Open Court at West Palm Beach, Palm Beach County, Florida this 21 day of April, 2003.

THIS 15 DAY OF July, 2011
 SHARON R. BOOK
 CLERK & COMPTROLLER

(rev. 12/98) By *Stawer* DEPUTY CLERK CIRCUIT COURT JUDGE GM_01227 *Z*

EDWARD A. GARRISON

(rev. 12/98)

CASE NO. W4937CF 1402 DIV. W

DEFENDANT

BZ W/M

FILED

JUDGMENT

NOV 21 2000

The above Defendant, being personally before this Court represented by T. Williams APD (attorney)

GM 01228

EXHIBIT Z

 Date: 4/25/16 ROYAL PALM BEACH POLICE DEPARTMENT Page: 1
 Time: 8:51:59 Offense Report Program: CMS301L

Day Of Week : Friday Report Date : 8/03/01 23:43
 Occur From Date: 8/03/01 20:00 Occur To Date : 8/03/01 23:42
 Dept Class : THEFT/LARCENY
 Street Number : HIDDEN HARBOR, [REDACTED]
 City : ROYAL PALM BEACH, FL 33411
 Zone/division : Zone Two (2) (So of Okee/E thr Wil)
 Location Type : APARTMENT/CONDO Case Status : OPEN / NOT ACTIVE
 Report Officer : LLEWELLYN, CRAIG Supervisory Emp: MURPHY, THOMAS 8/06/01
 Case Status Dt : 8/03/01

***** C A S E M A N A G E M E N T I N F O R M A T I O N *****

Case Number : 1-01-003008 Dept Class : THEFT/LARCENY
 Case Status : OPEN / NOT ACTIVE Case Status Dt : 8/03/01

***** O F F E N S E R E P O R T # 1 *****

State Class : Larceny - From Building
 Attmpt/Committ : Committed Statute/Ordin : 812.014(2C1)

***** P R O P E R T Y I N F O R M A T I O N # 1 *****

Category : STOLEN UCR Prop Type : CURRENCY, NOTE, ETC.
 Quantity : 5 Description : US CURRENCY
 Value : 500.00 Property type : CURRENCY/NEGOTIABLE

***** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 1 **

Case Number : 1-01-003008 Prompt valid in: UNKNOWN,
 City : ROYAL PALM BEACH, FL 33411
 Home Phone No. : 561/000-0000 Business Phone : 561/000-0000
 Race : Unknown Sex : Unknown
 Ethnic Origin : Hispanic

***** V I C T I M I N F O R M A T I O N - # 1 *****

Case Number : 1-01-003008 Prompt valid in: ROBERTS, VIRGINIA L
 Street Number : [REDACTED]
 City : ROYAL PALM BEACH, FL 33411
 County : PALM BEACH
 Business Phone : 561/714-5252
 Birth Country : Unknown
 Race : White
 Ethnic Origin : WHITE
 Weight : 103
 Victim Type : Juvenile

***** O T H E R P E R S O N I N F O R M A T I O N - # 1 *****

Case Number : 1-01-003008 Last Name : FIGUEROA, ANTHONY L
 Person Type : OTHER PERSON
 Street Number : [REDACTED]
 City : ROYAL PALM BEACH, FL 33411
 County : PALM BEACH
 Business Phone : 561/000-0000
 Birth Country : Unknown
 Race : White
 Ethnic Origin : WHITE
 Oper Lic Cntry : Unknown
 Sex : Male
 Juvenile : ADULT

***** O T H E R P E R S O N I N F O R M A T I O N - # 2 *****

Case Number : 1-01-003008 Last Name : SWITZER, KYLE M

CERTIFIED
 TO BE A TRUE COPY
 RIC L. BRADSHAW, SHERIFF
 GM_00777

Date: 4/25/16
Time: 8:51:59

ROYAL PALM BEACH POLICE DEPARTMENT
Offense Report

Page: 2
Program: CMS301L

1-01-003008 (Continued)

Person Type : OTHER PERSON
Street Number : [REDACTED]
City : ROYAL PALM BEACH, FL 33411
County : PALM BEACH
Birth Date : [REDACTED] Birth Country : Unknown
Oper Lic No. : [REDACTED] FL United States
Race : White Sex : Male
Ethnic Origin : WHITE

***** OTHER PERSON INFORMATION - # 3 *****
Case Number : 1-01-003008 Last Name : RIGEL, DUSTIN
Person Type : OTHER PERSON
Street Number : [REDACTED]
City : LOXAHATCHEE, FL 33470
County : PALM BEACH
Business Phone : 561/000-0000
Birth Country : Unknown Oper Lic Cntry : Unknown
Race : White Sex : Male
Ethnic Origin : WHITE

***** OTHER PERSON INFORMATION - # 4 *****
Case Number : 1-01-003008 Last Name : JEFFERSON, CRAIG
Person Type : [REDACTED]
Street Number : [REDACTED]
City : [REDACTED]
County : [REDACTED]
Business Phone : [REDACTED]
Birth Country : [REDACTED]
Race : [REDACTED]
Ethnic Origin : [REDACTED]

***** OTHER PERSON INFORMATION - # 5 *****
Case Number : 1-01-003008 Last Name : URVIS, SCOTT
Person Type : [REDACTED]
Street Number : [REDACTED]
City : [REDACTED]
County : [REDACTED]
Business Phone : [REDACTED]
Birth Country : [REDACTED]
Race : [REDACTED]
Ethnic Origin : [REDACTED]

***** OTHER PERSON INFORMATION - # 6 *****
Case Number : 1-01-003008 Last Name : RISDEN, RICHARD ARTHUR
Person Type : OTHER PERSON
Street Number : [REDACTED]
City : ROYAL PALM BEACH, FL 33411
County : PALM BEACH Home Phone No. : [REDACTED]
Business Phone : 561/000-0000 Birth Date : [REDACTED]
Birth Country : Unknown
Oper Lic No. : [REDACTED] FL United States
Race : White Sex : Male

CERTIFIED
TO BE A TRUE COPY
RIC L. BRADSHAW, SHERIFF
GM_00778

 Date: 4/25/16 ROYAL PALM BEACH POLICE DEPARTMENT Page: 3
 Time: 8:51:59 Offense Report Program: CMS301L

Ethnic Origin : WHITE Height : 511
 Weight : 160

***** N A R R A T I V E # 1 *****
 Original Report Reported By: LLEWELLYN, CRAIG R. 8/03/01
 Entered By: JARRETT, DAWN M. 8/16/01

ON 080301 AT 2343 HOURS I WAS DISPATCHED TO [REDACTED] IN REFERENCE TO A SUSPICIOUS INCIDENT. UPON ARRIVAL I MADE CONTACT WITH VIRGINIA ROBERTS AND ANTHONY FIGUEROA THE RESIDENTS OF [REDACTED]. V. ROBERTS STATED THAT EARLIER IN THE EVENING SHE HAD SEVERAL PEOPLE VISITING HER AND A. FIGUEROA. V. ROBERTS STATED THAT WHILE THE PEOPLE WERE IN HER APARTMENT, ONE OF THEM WENT INTO HER BEDROOM AND REMOVED \$500.00 CASH FROM HER WALLET. V. ROBERTS STATED THAT SHE DOES NOT KNOW WHICH OF HER VISITORS TOOK THE MONEY. A. FIGUEROA STATED THAT V. ROBERTS WALLET WAS LOCATED IN A POCKET OF A SHIRT WHICH WAS INSIDE THE CLOSET OF THE MASTER BEDROOM. A. FIGUEROA STATED THAT HE SPOKE TO ALL OF THE VISITORS ABOUT THE MISSING MONEY, AND THAT NO ONE ADMITTED TO TAKING IT. V. ROBERTS AND A. FIGUEROA STATED THAT SEVERAL OF THE VISITORS HAD ALREADY LEFT PRIOR TO MY ARRIVAL, AND THAT THEY COULD NOT PROVIDE NAME OR CONTACT INFORMATION FOR THOSE THAT ALREADY LEFT.

I THEN MADE CONTACT WITH THE REMAINING VISITORS RICHARD RISDEN, SCOTT ORVIS, CRAIG JEFFERSON, DUSTIN RIGEL, AND KYLE SWITZER, A RESIDENT OF [REDACTED]. ALL INDIVIDUALS STATED THAT THEY WERE NOT RESPONSIBLE FOR TAKING THE MONEY NOR DID ANY OF THEM KNOW WHO TOOK IT.

I TOOK THE NECESSARY INFORMATION FROM V. ROBERTS AND A. FIGUEROA AND PROVIDED ME WITH A VICTIM'S RIGHTS SHEET THAT CONTAINED A CASE NUMBER. NO FURTHER SUSPECT INFORMATION AT TIME OF REPORT.

***** END OF REPORT *****

CERTIFIED
 TO BE A TRUE COPY
 RIC L. BRADSHAW, SHERIFF

GM_00779

EXHIBIT AA

PALM BEACH COUNTY SHERIFF'S OFFICE PAGE 1
CASE NO. 02075321 OFFENSE REPORT CASE NO. 02075321

DISPOSITION: ZULU
DIVISION: ROAD PATROL

CIVIL MATTER * * *
SIGNAL CODE: 66 CRIME CODE: NON CRIME CODE: CC CODE: 9566 06/02/02 SUNDAY
ZONE: A81 GRID: 3C21 DEPUTY I.D.: 6933 NAME: WIKSE JOHN ASSIST: TIME D 2148 A 2159 C 2249
OCCURRED BETWEEN DATE: 06/02/02 , 2148 HOURS AND DATE: , 0000 HOURS
EXCEPTION TYPE:
INCIDENT LOCATION: 13475 N 24 CT APT. NO.:
CITY: LOXAHATCHEE STATE: FL ZIP: 33470
NO. OFFENSES: 00 NO. OFFENDERS: 00 NO. VEHICLES STOLEN: 0 NO. PREMISES ENTERED: 0
LOCATION:
NO. VICTIMS: 00 NO. ARRESTED: 0 FORCED ENTRY: 0

NAME LIST:
ROLE:

OTHER PHILLIP E RATCLIFFE
SEX: M RACE: W HT: 509 WT: 165 HR
OTHER LORRI M DEPASQUA
SEX: F RACE: W HT: 504 WT: 120 HR
OTHER VIRGINIA L ROBERTS
SEX: F RACE: W HT: 504 WT: 108 HR
RESIDENTIAL ADDRESS: 155 SANTIAGO ST
BUSINESS PHONE: 561 000-0000
COMPLAINANT ANTHONY L FIGUEROA

ON JUNE 2, 2002 AT 2148 HOURS, I WAS DISPATCHED TO 13475 24TH COURT,
NORTH, LOXAHATCHEE, FLORIDA IN REFERENCE TO A REPORT OF A CIVIL DISPUTE.
UPON ARRIVAL, I MET WITH WHITE FEMALE, VIRGINIA L. ROBERTS, DATE OF BIRTH
AND WHITE MALE, ANTHONY L. FIGUEROA, DATE OF BIRTH , WHO WERE
STANDING AT THE END OF THE DRIVEWAY ACCESS TO THE PROPERTY.
THERE WAS A PILE OF PERSONAL EFFECTS (I.E. A LAMP, CLOTHING AND OTHER

printed by Employee Id #: 8557 on April 22, 2016 03:09:29PM

CERTIFIED
TO BE A TRUE COPY
MICHAEL BRADSHAW, SHERIFF

GM_00748

PALM BEACH COUNTY SHERIFF'S OFFICE PAGE 2
CASE NO. 02075321 OFFENSE REPORT CASE NO. 02075321
DISPOSITION: ZULU

MISCELLANEOUS ITEMS) NEXT TO THEM.

VIRGINIA EXPLAINED THAT THEY HAD BEEN LIVING AT THE RESIDENCE FOR APPROXIMATELY FOUR MONTHS AND THAT THEY HAD MADE AN AGREEMENT WITH THE LANDLORD TO VACANT THE PROPERTY AS OF 060102. SHE CONCLUDED BY STATING THEY HAD TRANSPORTED ONE LOADED OF THEIR BELONGINGS AND HAD RETURNED FOR THE REMAINING ITEMS WHEN THEY FOUND THEM AT THE END OF THE DRIVEWAY IN DAMAGE CONDITION. ADDITIONALLY, THEY HAD LEFT A MATTRESS THAT WAS NOW BURNING ON THE PROPERTY.

I WENT OUT TO THE PROPERTY AND MADE CONTACT WITH THE LANDLORD, A WHITE MALE, PHILLIP E. RADCLIFFE, III, DATE OF BIRTH [REDACTED]. PHILLIP STATED THAT PRIOR TO LEAVING, ANTHONY AND VIRGINIA MADE STATEMENTS SUCH AS "YOU CAN KEEP THE REST YOU BASTARD!" THIS STATEMENT AS WELL AS OTHERS WERE WITNESS BY WHITE FEMALE, LORRI M. DESPAQUA, DATE OF BIRTH [REDACTED]. PHILLIP STATED THAT THERE WAS A SUBSTANTIAL AMOUNT OF TIME SINCE THEIR DEPARTURE FROM PHILLIP. HE FELT THAT THEY HAD DISCARDED THE ITEMS SO HE PLACED THEM OUT FOR TRASH PICKUP. HE ALSO STATED THAT THE MATTRESS WAS COVERED IN CAT URINE SO HE BURNED IT FOR SANITARY PURPOSES.

ALL PARTIES WERE ADVISED THAT AN INFORMATION REPORT WILL BE COMPLETED IN REGARD TO THE INCIDENT AND EXPLANATION OF CIVIL REMEDIES WERE GIVEN.

IT SHOULD NE NOTED THAT VIRGINIA PRIOR TO LEAVING ADVISED ME THAT SHE WOULD PROVIDE ME WITH A LIST OF DAMAGE AND/OR RUIN ITEMS AS SOON AS POSSIBLE.
D/S J. WIKSE/ID 6933/TRANS: 060502/BH
DICT: 060302/1418 HRS.

printed by Employee Id #: 8557 on April 22, 2016 03:09:29PM

CERTIFIED
TO BE A TRUE COPY
RIC L. BRADSHAW, SHERIFF

GM_00749

EXHIBIT BB

Date 1995 Nov	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			
			From	To					AB	BA	NA	SA
17	G1159B	N908JE	CMH	PBI		779	JE		2	0		
20	"	"	PBI	TEB		780	JE, AS		2	2		
21	"	"	TEB	PBI		781	JE, AS, EVA, CLANN, BOBY, 1 FEMALE		2	4		
26	"	"	PBI	TEB		782	GM, MARY GREPP, AS, ALAN GREENBERG, MR. GREENBERG, EVA, CLANN, BOBY, NANNY		2	4		
29	"	"	TEB	CMH		783	JE, SOPHIE BIDDLE, 3 MALES		1	3		
30	"	"	CMH	PBI		784	JE, SOPHIE BIDDLE	1/1	2	0		
DEC 3	"	"	PBI	TEB		785	JE, SOPHIE BIDDLE		2	2		
5	"	"	TEB	PBI		786	JE, AS		2	3		
1996 JAN 4	"	"	PBI	TEB		787	JE, GM, GWYNOLYN BECK, JANET SEHUM, DAVID ANTON		2	1		
9	"	"	TEB	PBI		788	JE, SOPHIE BIDDLE		2	5		
12	"	"	PBI	TEB		789	JE, AS, SOPHIE BIDDLE		2	3		
20	"	"	TEB	PBI		790	JE, GM, DEBORAH	CONFIDENTIAL	2	5		
21	"	"	TEB	SAF		795	JE, GM	1/1	4	0		
21	"	"	SAF	LAX		796	JE, GM	1/1	2	0		
23	"	"	LAX	TEB		797	JE		4	4		
25	"	"	TEB	PBI		798	JE		2	3		
28	"	"	PBI	CMH		799	JE, GM	1/1	2	0		
28	"	"	CMH	TEB		800	JE, GM		1	0		
31	"	"	TEB	PBI		801	JE		2	3		
I certify that the statements made by me on this form are true.								Page Total	4/4	44	2	
Pilot's Signature: <u>David Rodriguez</u>								Amount Forward	5822 5593	6558	6	
								Total to Date	5822 5597	6602	8	



Date 1946 FEB	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRCRAFT	
5	G1159B	N908JE	PBI	TNCM		802	JE, GM	1/1	24	
7	G1159B	"	TNCM	TEB		803	JE, GM	1/	40	
9	"	"	TEB	PBI		804	JE, GM, SHARON REYNOLDS		21	
12	"	"	PBI	TEB		805	JE, GM, SHARON REYNOLDS	1/1	21	
15	"	"	TEB	BCT		806	JIMMY COYNE, MRS. COYNE, AUBURN COYNE, WARRICK, KYLE DENNEY, SOPHIE BIDDLE, JOY		24	
19	"	"	BCT	TEB		807	JIMMY COYNE, MRS. COYNE, AUBURN COYNE, WARRICK, SOPHIE BIDDLE, JOY	✓	23	
28	"	"	TEB	PBI		808	JE, GM, AS, SOPHIE BIDDLE		22	
MAR 4	"	"	PBI	TEB		809	JE, GM, AS, SOPHIE BIDDLE, MAREP		24	
8	"	"	TEB	PBI		810	JE, GM, AS, PIERRE NGUY, 1 FEMALE	1/1	26	
11	"	"	PBI	TEB		811	JE, GM, AS, CHRESSINE, 1 FEMALE		23	
15	"	"	TEB	PBI		812	JE, GM, AS, 1 FEMALE		21	
18	"	"	PBI	CMH		813	JE, GM, AS, CLAIRE HAZEL, 1 FEMALE	1/1	21	
18	"	"	CMH	TEB		814	JE, GM, AS		CONFIDENTIAL DR 000002	
22	"	"	TEB	PBI		815	JE, FRANCES, SOPHIE BIDDLE, EVA, 1		23	
24	"	"	PBI	TEB		816	JE, EVA, BOBBY, 13 PAY		23	
26	"	"	TEB	VNY		817	JE		55	
29	"	"	VNY	SAF		818	JE		15	
APR 8	"	"	PBI	TEB		821	JE, GM, AS, EVA, GLENN, COLLEEN, NANCY		21	
15	Cessna 421B Simulator Initial Training						Instrument Conversion Recg		100	
I certify that the statements made by me on this form are true.								Page Total	6/4	538
Pilot's Signature <u>David Rodgers</u>								Amount Forward	5806/5547	66028
								Total to Date	5837/5547	66566

Date to 96 APR	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ADP	PA	
22	G1159B	N908JE	PBI	TEB		828	JE, GM		2	2	
26	"	"	TEB	PBI		829	JE, GM, 3 PAX	1/1	2	3	
29	"	"	PBI	TEB		830	JE, GM, MASS (GRASP) 1 MALE, 2 FEMALES	1/1	2	3	
MAY 2	"	"	TEB	EIDW		831	JE ELIZABETH JOHANN, S. DOBLEN, CONNOR, E. WATSON, A. TOL, S. TOL, O. TOL	1/1	6	0	
3	"	"	EIDW	EIWF		832	CATHERINE PERCLA, ELIZABETH WATSON, A. TOL, S. TOL, O. TOL	1/1	5		
3	"	"	EIWF	LFPB		833	JE, PAMELA JOHANNOFF	1/1	1	3	
6	"	"	LFPB	LSGG		834	JE, PAMELA JOHANNOFF	1/1	7		
6	"	"	LSGG	EINN		835	JE, PAMELA JOHANNOFF	1/1	1	8	
6	"	"	EINN	TEB		836	JE, PAMELA JOHANNOFF		6	5	
8	"	"	TEB	MDLR		837	JE, GM, KATHARINA KOTZIG	1/1	3	3	
9	"	"	MDLR	MBGT		838	JE, GA, KATHARINA KOTZIG	1/1	7		
9	"	"	MBGT	PBI		839	JE, GM, KATHARINA KOTZIG	1/1	1	5	
13	"	"	PBI	CMB		840	JE, GM, AS, 2 FEMALES	1/1	2		
13	"	"	CMB	TEB		841	JE, GM, AS, 1 FEMALE		1	1	
17	"	"	TEB	PBI		842	JE		2	1	
20	"	"	PBI	TEB		843	JE	JLM WEDEN JEM WEDEN JEM WEDEN	1/1	2	2
22	"	"	TEB	SAC		844	JE, GM	1/1	4	0	
24	"	"	SAC	PBI		845	JE, GM	1/1	3	1	
27	"	"	PBI	TEB		846	JE, GM, ANKIE		2	3	
Page Total								14/10	46	0	
Amount Forward								5832/5601	6556	6	
Total to Date								5846/5601	6702	6	

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

...and Cla

SEL

2116

2111

Date 1976 MAY	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			
			From	To					AIRCRAFT			
30	G1159B	N908JC	TEB	PBI		847	JC					
JUN 2	"	"	PBI	TEB		848	JC, PAULA CROSBY, ALLISON, SHARON, JEFFANY	1/1	2	0		
5	"	"	TEB	PBI		849	JC, ALLISON, CHERIE, CELINA	1/1	2	5		
18	"	"	PBI	TEB		850	NO PASSENGERS JIM WARDEN	1/1	2	3		
19	"	"	TEB	PBI		851	JC, G.M.		2	2		
24-27	"	SIMULATOR	SAV	SAV			RECURRENT TRAINING		6	1		
JUL 9	"	N908JC	SAV	CMH		860	JC, G.M.	1/1	2	0		
10	"	"	CMH	TEB		861	JC, G.M., IRA ZICKERMAN	1/1	2	5		
12	"	"	TEB	MVY		862	JC	1/1	1	2		
12	"	"	MVY	TEB		863	JC	1/1	6			
12	"	"	TEB	PBI		864	JC, G.M.		9			
15	"	"	PBI	TEB		865	JC, G.M.	1/1	2	4		
16	"	"	TEB	PBI		866	JC, CELINA		2	3		
17	"	"	PBI	SAV		867	OPS 1 INSPECTION	1/1	9			
AUG 3	"	"	SAV	EWR		868	OPS 1 INSPECTION	1/1	1	7		
14	"	"	PBI	TEB		873	JC, G.M., ANDY, MANDY, RALPH	1/1	2	3		
14	"	"	TEB	TVC		874	JC, G.M.	1/1	1	5		
16	"	"	TVC	TEB		875	JC, G.M.	1/1	1	4		
18	"	"	TEB	MVY		876	JC, DAVID ROSSMAN, FELICIA TAYLOR, 2 PAX	1/1	6			

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodger

Page Total	13/12	375
Amount Forward	5840/511	67026
Total to Date	5851/523	67401

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2116	5454
2116	5462

CONFIDENTIAL DR 000004

Date 1946	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRPORT	
18	G1159B	N908JE	MVY	TEB		877	JE, DAVID ROTHMAN, CELINA MIDDLEBART	1/1	9	
18	"	"	TEB	PBI		878	JE, CELINA MIDDLEBART	1/1	2	2
21	"	"	PBI	JAN		879	JE, GM, ROBIN PLANT	1/1	1	7
21	"	"	JAN	SAF		880	JE, GM, ROBIN PLANT	1/1	1	9
26	"	"	SAF	PBI		881	JE, GM, ROBIN PLANT	1/1	3	3
SEP 5	"	"	PBI	TEB		882	JE, GM	1/1	2	3
7	"	"	TEB	BEO		883	JE	1/1	6	
7	"	"	BEO	PVD		884	JE	1/1	3	
7	"	"	PVD	CMH		885	JE	1/1	1	5
8	"	"	CMH	DCA		886	JE, 1 MAGE, 1 FEMALE	1/1	7	
8	"	"	DCA	CMH		887	JE, JOAN GLENN, ALAN DERSHOWITZ	1/1	8	
8	"	"	CMH	TEB		888	JE, ALAN DERSHOWITZ	1/1	1	
9	"	"	TEB	BOS		889	ALAN DERSHOWITZ	1/1	6	
9	"	"	BOS	TEB		890	RETURN TO TEB	1/1	8	
12	"	"	TEB	PBI		891	JE, CELINA MIDDLEBART		2	3
18	"	"	PBI	TEB		892	JE, GM	1/1	2	3
20	"	"	TEB	PBI		893	JE, GM	1/1	2	1
23	"	"	PBI	BEO		894	JE, GM	1/1	2	6
23	"	"	BEO	TEB		895	JE, GM		6	

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodger

Page Total

16/15 286

Amount Forward

5859 512 6740 1

Total to Date

5859 512 6740 7

...and Class

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CONFIDENTIAL DR_000005

2116 5

2116 5

Date 1946 SEP	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Propeller	Engine
26	G1159B	N908JE	TEB	CMH		896	JE	1/1	1	2
26	"	"	CMH	PBI		897	JE		1	9
26	"	"	PBI	TEB		898	JE, GM, DEDIER	1/1	2	4
10	"	"	TEB	PBI		902	JE		2	5
14	"	"	PBI	TEB		903	JE, 1 FEMALE	1/1	2	4
15	"	"	TEB	CMH		904	TO CMH FOR PICK-UP	1/1	1	2
15	"	"	CMH	TEB		905	JE, DARREN, IRA ZIGHERMAN, JEFF SCHWARTZ	1/1	1	2
19	"	"	TEB	PBI		906	JE, DIDIER CALZADUMEC	1/1	2	3
22	"	"	PBI	TEB		907	JE, GM, DEDIER CALZADUMEC	1/1	2	3
24	"	"	TEB	SAF		908	JE, GM, LARRY		4	1
25	"	"	SAF	PBI		909	JE, GM, SHANNON	1/1	3	2
27	"	"	PBI	TEB		910	JE, GM, JOE PDSBOW, SHARON	1/1	2	4
30	"	"	TEB	DCA		911	JE, ANDY STEWART, LESLIE GELB, BRIAN MATHIS, LESTER RALPH, STEPHEN RUDEN	1/1	6	
30	"	"	DCA	TEB		912	JE, ANDY STEWART, LESLIE GELB, 3 PAID	1/1	6	
31	"	"	TEB	PBI		913	JE, GM, DEDIER CALZADUMEC		2	2
NOV 4	"	"	PBI	TEB		914	JE, GM, DEDIER CALZADUMEC	1/1	2	5
7	"	"	TEB	PBI		915	JE, SOPHIE, JEFF SCHWARTZ, GAMESLY (4) EVA, CLEOP, STELLA, MANNY, LINDA, JERRY		2	2
11	"	"	PBI	TEB		916	JE, SOPHIE, STELLA, JEFF SCHWARTZ, GAMESLY EVA, CLEOP, MANNY, NANCY, D. RUDEN		2	2
15	"	"	TEB	CMH		917	JE, GM, JEFF SCHWARTZ, DARREN ROSS, KIPES		1	3

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Page Total	11/9	38	7
Amount Forward	5875	6768	7
Total to Date	5886	6807	4

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Date to 16 NOV	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Propulsion	
15	G1159B	N908JE	CMH	PBI		918	JE, GM, CLAIR		2	1
17	"	"	PBI	BEP		919	JE, GM, EVA + GLENN DUBEN, BOBBY, NANNY	1/	2	6
17	"	"	BEP	TGB		920	GM, EVA, GLENN DUBEN, BOBBY, NANNY			6
21	"	"	TGB	PBI		921	GM, JE, DIDIER CAZADUMEL, 2 AUNT, DAVID ROTH, 2 ELMORE		2	2
28	"	"	PBI	LZU		922	JE, GM, 2 AUNT, PAULA EPSTEIN	1/1	1	3
28	"	"	LZU	PBI		923	JE, GM	1/1	1	2
30	"	"	PBI	ABY		924	JE, GM	1/1	1	1
30	"	"	ABY	LZU		925	JE, GM			5
30	"	"	LZU	PBI		926	JE, GM, 2 AUNT, PAULA EPSTEIN, MARK + KAREN EPSTEIN		1	3
DEC 2	"	"	PBI	TGB		927	JE, GM, MARK + KAREN EPSTEIN, 2 AUNT, GARY, BOBBY, GLENN DUBEN, BOBBY, BOBBY	1/1	2	3
4	"	"	TGB	PBI		928	JE, DIDIER CAZADUMEL, GLENN DUBEN, BOBBY	1/	2	3
9	"	"	PBI	FTK		929	JE, GM, DIDIER CAZADUMEL	1/	2	1
9	"	"	FTK	TGB		930	JE, GM, DIDIER, NATHAN MYERHOD, BRAN	1/	1	6
12	"	"	TGB	PBI		931	JE, JIMMY CAYNE, PAT CAYNE, EVA ADAM, GLENN DUBEN, GARY'S NANNY		2	2
20	"	"	PBI	TEST		932	JE, GM, GLENN DUBEN, BOBBY, BOBBY, BOBBY	1/1	2	3
23	"	"	TEST	PBI		933	JE, GM, GLENN DUBEN, BOBBY, BOBBY, BOBBY	1/1	2	4
1997 JAN 5	"	"	PBI	EWR		934	JE, GM, DONALD THOMP, MARK EPSTEIN, EVA, GLENN, GLENN DUBEN, DIDIER	1/	3	1
11	"	"	EWR	TIX		935	JE, NATHAN MYERHOD, ALAN + BOBBY DOERSHWITZ, GLENN MICHENER	1/	2	3
11	"	"	TIX	PBI		936	NO PASSENGERS - RETURN WITH 421	1/1		4
I certify that the statements made by me on this form are true.								Page Total	13/8	33/9
Pilot's Signature <i>David Rodgers</i>								Amount Forward	5886 5647	6807/4
								Total to Date	5655	6841/3

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Date 1997 FDM	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			
			From	To					ADSL	ADSL	ADSL	ADSL
21	GILB	N908JE	PBI	TEB		937	JG, GM, KAREN		2	2		
24	"	"	TEB	TNCM		938	JG, GM, CLARE HAZEL, AMANDA	1/1	3	4		
25	"	"	TNCM	PBI		939	JG, GM, CLARE HAZEL, AMANDA	1/1	2	8		
29	"	"	PBI	TEB		940	JG, GM, GWYNDDEN BECK	1/1	2	1		
30	"	"	TEB	PBI		941	JG, CELENA MEDLOCK, ANTHONY BARTLETT, GWYNDDEN BECK, MEDLOCK		2	4		
2	"	"	PBI	TEB		942	JG, CELENA MEDLOCK, ANTHONY, DONNA CARROLL, ANTHONY, JG, CELENA		2	2		
2	"	"	TEB	SAV		943	TO SAV FOR GUYAN CHANG, GUY TRACY, GUYAN CHANG, GUYAN		1	7		
13	"	"	SAV	TEB		944	NO PASSENGERS	1/1	1	5		
13	"	"	TEB	PBI		945	JG, GM, SCOTTIE DODGE, ROBIN RAY ANTON, GUY, CELENA, GUY, IMAI		2	5		
17	"	"	PBI	TEB		946	JG, GM, GUY, GUY, CELENA, GUY, IMAI	1/1	2	2		
21	"	"	TEB	PBI		947	JG, CELENA MEDLOCK, ANTHONY		2	7		
23	"	"	PBI	TEB		948	JG, CELENA, JESSE, LYN, 2 KEYS, FORTY EIGHT BOS, ANTHONY, SCOTTIE, GUY, KENNY	1/1	2	2		
25	"	"	TEB	PBI		949	JG, GM, DONNA, DEBORAH CALDWELL		2	2		
1	"	"	PBI	SAF		950	JG, GM	1/1	3	6		
2	"	"	SAF	SJC		951	JG, GM	1/1	2	2		
3	"	"	SJC	TEB		952	JG, GM	1/1	4	3		
8	"	"	TEB	PBI		953	JG, GM, CLARE HAZEL		2	2		
10	"	"	PBI	CMH		954	JG, CLARE HAZEL	1/1	2	0		
10	"	"	CMH	VNC		955	JG, PAMELA STEVENS	1/1	2	0		

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodgers

Page Total	16/7	45	9
Amount Forward	5894	684	3
Total to Date	5904	688	7
	5662		

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Date 1947	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRPLANE	
MAR 10	G-1159B	N908JE	VNC	PBI		956	JE		4	
15	"	"	PBI	DCA		957	JE, CELINA MEDLFART	1/1	1	7
15	"	"	DCA	IAD		958	REPOSITION FOR CURSEW		2	
15	"	"	IAD	PBI		959	JE, CELINA MEDLFART		2	0
24	"	"	PBI	TEB		960	JE, GM, SUZANNA, JOEL PASHEAU, 1 FEMALE	1/1	2	3
27	"	"	TEB	PBI		961	JE, GM, DIDIER CAZADUMEL		2	1
30	"	"	PBI	SAF		962	JE, GM, DIDIER CAZADUMEL		3	7
APR 1	"	"	SAF	CMH		963	JE, GM, DC	1/1	2	4
2	"	"	CMH	TEB		964	JE, GM, DC		1	1
10	"	"	TEB	PBI		965	JE, DC, DONNA, 2 FEMALE, 1 MALE		2	2
15	"	"	PBI	DCA		966	JE, GM, DC, MANDY, GWENDOLYN BECK, DEEDRA, KATHY LEB	1/1	2	0
15	"	"	DCA	TEB		967	JE, DC, GWENDOLYN BECK, LYNN		1	
17	"	"	TEB	PBI		968	JE, GM, DC, LIA, GLENN, CELINA, JOEL PASHEAU, 2 FEMALE, GWENDOLYN BECK, DEEDRA, KATHY LEB	1/1	2	4
21	"	"	PBI	TEB		969	JE, DC, MANDY, LISA, 1 MALE	1/1	2	2
21	"	"	TEB	BGD		970	JE	1/1	5	
21	"	"	BGD	TEB		971	JE		7	
22	"	"	TEB	PBI		972	JE		2	3
27	"	"	PBI	TEB		973	JE, CELINA MEDLFART	1/1	2	4
MAY 2	"	"	TEB	EGGW		974	JE, GM	1/1	6	5
I certify that the statements made by me on this form are true.								Page Total	9/9	378
Pilot's Signature <u>David Rodage</u>								Amount Forward	5909	6887
									5662	2
								Total to Date	5918	6925
								5671	0	

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Date 1997 MAY	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRPLANE	
5	G1159B	N908JE	EGGW	LSGG		975	JE	1/1	1	3
5	"	"	LSGG	LFPB		976	JE	1/1	7	
6	"	"	LFPB	CYJT		977	JE, GM	1/1	5	6
6	"	"	CYJT	TEB		978	JE, GM	1/1	2	2
9	"	"	TEB	SAF		979	JE, GM, NADIA		3	9
12	"	"	SAF	VNY		980	JE	1/1	1	5
14	"	"	VNY	SAF		981	JE, SOPHIE BIDDLE	1/1	1	5
15	"	"	SAF	DFW		982	JE, GM, SOPHIE BIDDLE, JACK ROBERTSON	1/1	1	2
15	"	"	DFW	PBI		983	JE, SOPHIE BIDDLE	1/1	2	0
23	"	"	PBI	JFK		984	REPOSITION TO JFK		2	2
24	"	"	JFK	PBI		985	JE, CELINA MIDELEARS, GINGER SOUTHGATE	1/1	CONFIDENTIAL DR 000010	
JUN 1	"	"	PBI	TEB		986	JE, MANDY	1/1	2	1
5	"	"	TEB	PBI		987	JE, GM, DIDIER		2	4
9	"	"	PBI	TEB		988	JE, GM	1/1	2	3
21	"	"	TEB	MVY		989	JE, LYNN FORSTER, HEATHER MANN RUSS KIPPES	1/1		6
21	"	"	MVY	PBI		990	JE, HEATHER MANN RUSS KIPPES		2	4
23	"	"	PBI	CMH		991	JE, HEATHER RUSS KIPPES	1/1	2	1
23	"	"	CMH	TEB		992	JE, RUSS KIPPES		1	1
27	"	"	TEB	PBI		993	JE, GM RUSS KIPPES		2	1
I certify that the statements made by me on this form are true.								Pago Total	13/13	393
Pilot's Signature <u>David Rodger</u>								Amount Forward	5918	6925 0
								Total to Date	5931	6964 3

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Date 19 <u>97</u> <u>JUL</u>	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRPLANE	
1	G1159B	N908JE	PBI	TEB		994	JG, GM, PAULA EPSTEIN	1/1	2	5
10	"	"	CMH	SAF		990	JG, RIDER	1/1	3	0
16	"	"	PBESAP	PBI		1000	JG, GM, RIDER CAZADUMEC		3	2
22	"	SIMULATOR	DFW	HOU			SIMULATOR - STEEP TURNS, VSO, VSI, SET UPST (WAKE TURBULENCE)		3	0
23	"	"	TEB	HPN			WINTER OPERATIONS ELECTRICALLY SINGLE ENGINE, RTO		3	0
24	"	"	DFW	COS			HIGH ALTITUDE, HYDRAULICS EMERGENCY DESCENT, WINDSHEAR		3	0
13	C-421B	N908GM	ZOR- SAF	ZOR		57	4 TAKE OFF + LANDING.	4/4	7	
15	"	"	ZOR	SAF		58		1/1	2	
AUG 1	"	"	SAF	ZOR		59	KRISTY RODGERS	1/1	4	
9	G1159B	N908JE	PBI	TVC		1012	JG, GM	1/1	2	7
10	"	"	TVC	TEB		1013	JG, GM	1/1	1	5
13	"	"	TEB	PBI		1014	JG, GM		2	5
17	"	"	PBI	MVY		1015	JG, HEATHER MANN	1/1	2	5
17	"	"	MVY	TEB		1016	JG, HEATHER MANN	1/1	7	
20	"	"	TEB	SAF		1017	JG, CELINA, GLEN EVA, CELINA MIDELFART, RIDER		3	9
23	"	"	SAF	TEB		1018	JG, CELINA MIDELFART, PEDER GLEN, EVA & CELINA DUBEN	1/1	3	5
24	"	"	TEB	FOK		1019	REPOSITION	1/1	5	
24	"	"	FOK	MVY		1020	JG, CELINA MIDELFART		4	
25	"	"	MVY	PBI		1021	JG, CELINA MIDELFART	1/1	2	6

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodgers

Page Total	15/14	396
Amount Forward	5931 5684	69643
Total to Date	5946 5698	70039

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Date 10/47 SEP	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ADP/ADN	
1	G1159B	N908JE	PBI	TEB		1022	JG, HEATHER MANN	1/1	2	6
2	"	"	TEB	CMH		1023	REPOSITION	1/1	1	2
3	"	"	CMH	TEB		1024	STEVE & JUDY TUCKERMAN	1/1	1	2
3	"	"	TEB	LFPB		1025	JG, JACK ROBERTSON, STEVE & JUDY TUCKERMAN, KENNETH & ZEPHYR KUNDEL	1/1	6	6
6	"	"	LFPB	LFMN		1026	JG, GM, JOAN & ANNE GLENN, MARY JEVIS, FLIGHT ATTENDANT, GREGG BICE, STAFF	1/1	1	3
7	"	"	LFMN	EGGW		1027	JG, GM	1/1	1	6
12	"	"	EGGW	CYJT		1028	JG, GM		5	5
13	"	"	CYJT	PBI		1029	JG, GM		4	3
15	"	"	PBI	TEB		1030	JG, GM	1/1	2	3
19	"	"	TEB	CMH		1031	JG, HEATHER MANN, DIPSER	1/1	1	2
20	"	"	CMH	PBI		1032	JG, HEATHER MANN, DIPSER		CONFIDENTIAL DR 000012	
22	"	"	PBI	SAF		1033	JG, GM, DIPSER, CLAIRE HAZEL	1/1	3	6
26	"	"	SAF	TEB		1034	JG, GM, DIPSER, DOUG SHUTTLE, ALBERTO PLINIO, JACK ROBERTSON, PASCAL	1/1	3	5
28	"	"	TEB	PBI		1035	JG, GABRIELLE		2	4
18	G111	N883A	SAV	SAV			TEST FLIGHT FOR NATHAN MYHRVOLD, STALLS, ALL SYSTEMS CHECKED	1/1	2	0
26	CESSNA 441	N908GM	ZOR-SAF-ABQ-ABQ-ZOR				CEE REVOLUTION RING, TLS APPROACH, BDF APPROACH	4/4	1	9
4	G1159B	N908JE	PBI	STL		1036	REPOSITION	1/1	2	2
4	"	"	STL	PBI		1037	JG, GM		2	2
12	"	"	PBI	TEB		1038	JG, HEATHER MANN	1/1	2	9
I certify that the statements made by me on this form are true.								Page Total	16/13	504
Pilot's Signature <u>David Rodgers</u>								Amount Forward	5946	7003 9
								Total to Date	5698	7054 3
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Date 19 <u>97</u> <u>OCT</u>	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ABRPLANE		
17	G1159B	N908JE	TEB	PBI		1039	JE, GM, CLAUDE, EMMY, DIDIER, 1 FEMALE		2	5	
21	"	"	PBI	TEB		1040	JE, GM, MANDY EMMY, DIDIER	1/1	2	2	
24	CESSNA 421	N908GM	ZORRO	SAF	2000	37	CURRENT REQUIREMENT	4/4			
24	"	"	TEB	BED		1041	JE, EMMY	1/1		7	
24	"	"	BED	PBI		1042	JE, EMMY	1/1	2	6	
27	"	"	PBI	TEB		1043	JE, GM, EMMY TAYLER	1/1	2	1	
31	"	"	TEB	PBI		1044	JE, GM, ET, (GLEN, EVA), CELINA, JORDAN DUBIN & NANNY	1/1	2	4	
NOV 2	"	"	PBI	SAF		1045	JE, GM, ET, 1 FEMALE			3	8
4	"	"	SAF	TEB		1046	JE, GM, ET, GARY & MARY KERNY	1/1	3	4	
7	"	"	TEB	JAX		1047	JE, LYNN FORESTER	1/1	1	9	
7	"	"	JAX	PBI		1048	JE	1/1		7	
8	C-421	N908GM	PBI	MIA		70	LARRY VISOSKE	100	CONFIDENTIAL	DR_000013	
24	G1159B	N908JE	PBI	TEB		1049	REPOSITION TO TEB	1/1	2	3	
24	"	"	TEB	SAF		1050	JE, ET	1/1	3	9	
25	"	"	SAF	PBI		1051	JE, ET	1/1	3	0	
29	"	"	PBI	TEB		1052	JE, DIDIER, CELINA MIOGLART, JOE PAGANO, GENE			2	2
DEC 6	"	"	TEB	PBI		1053	JE, GM, ET			2	2
9	"	"	PBI	TEB		1054	JE, GM, ET	1/1	2	2	
11	"	"	TEB	PBI		1055	JE, EVA, CELINA, JORDAN DUBIN & NANNY			2	5

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodriguez

Page Total

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Total to Date

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Date 19 <u>97</u> <u>DEC</u>	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRPLANE	
14	G1159B	N908JC	PBI	TEB		1056	JE, GLEN, EVA, CELINA, JOR DAN DUBEN, NANNY, 2 FEMALES	1/1	2	1
17	"	"	TEB	BCT		1057	JE, MANDY ELLISON, GWENDOLYN BECK, WARREN SPENCER, JIMMY + MRS COYNE, ET		2	5
17	"	"	BCT	PBI		1058	JE, MANDY ELLISON, GWENDOLYN BECK, EMMY TAYLER			1
1998 JAN 3	"	"	PBI	TEB		1059	JE, GM, ET, GLEN DUBEN, JIMMY + MRS COYNE, WARREN WHITET, MARGARET WHESTER		2	3
8	"	"	TEB	SAF		1060	JE, GM, ET, DOUG SCHUETTLE	1/1	3	8
10	"	"	SAF	PBI		1061	JE, GM, ET, DOUG SCHUETTLE	1/1	2	7
13	"	"	PBI	TEB		1062	JE, GM, ET	1/1	2	3
18	"	"	TEB	PBI		1063	JE, ET, 1 FEMALE		2	4
20	"	"	PBI	TIST		1064	JE, GM, ET, GWENDOLYN BECK, SHARON	1/1	2	0
25	"	"	TIST	TNCM		1065	JE, GM, ET, MELENDRA LUNTZ, SHARON	1/1		4
25	"	"	TNCM	TEB		1066	JE, GM, ET, M.L., SC	1/1	4	2
30	"	"	TEB	PBI		1067	JE	1/1	2	3
31	"	"	PBI	JAX		1068	JE	1/1		8
31	"	"	JAX	APF		1069	JE, ELLEN SPENCER	1/1		8
31	"	"	APF	PBI		1070	JE, ELLEN SPENCER	1/1		4
FEB 2	"	"	PBI	TEB		1071	JE, SOPHIE BIDDLE		2	2
6	"	"	TEB	PBI		1072	JE, GM, ET, SOPHIE BIDDLE, EVA, CELINA, JORDAN, CELINA DUBEN	1/1	2	6
9	"	"	PBI	TEB		1073	JE, GM, ET, CLARENCE HATZEL, JOEL PASHKOW, IESMOW, GUYAN DEBROWITZ, MANDY + MRS COYNE, JIMMY + MRS COYNE, WARREN SPENCER	1/1	2	4
12	"	"	TEB	PBI		1074	JE, GM, JOEL PASHKOW, LYNNE PASHKOW, ET, JIM + MRS COYNE, WARREN SPENCER	1/1	2	6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodas

Page Total	14	38	9
Amount Forward	5975	7095	3
Total to Date	5729	7134	2

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Date 19 <u>77</u> <u>DEC</u>	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			
			From	To					A23P446			
14	G1159B	N908JE	PBI	TEB	1056	JE, GLEN, EVA, CELINA, JERRI DAN DUBEN, NANNY, 2 FEMALES	1/1	2	1			
17	"	"	TEB	BCT	1057	JE, MANDY ELLISON, GWENDOLYN BECK, WARREN SPENCER, JEMMY + MRS COYNE, CT		2	5			
17	"	"	BCT	PBI	1058	JE, MANDY ELLISON, GWENDOLYN BECK, EMMY TAYLER			1			
1978 JAN 3	"	"	PBI	TEB	1059	JE, GM, CT, GLEN DUBEN, JEMMY + MRS COYNE, WARREN SPENCER, MARGARET WYSE		2	3			
8	"	"	TEB	SAF	1060	JE, GM, CT, DOUG SCHOTTLE	1/1	3	8			
10	"	"	SAF	PBI	1061	JE, GM, CT, DOUG SCHOTTLE	1/1	2	7			
13	"	"	PBI	TEB	1062	JE, GM, CT	1/1	2	3			
18	"	"	TEB	PBI	1063	JE, CT, 1 FEMALE		2	4			
20	"	"	PBI	TIST	1064	JE, GM, CT, GWENDOLYN BECK, SHERRI CLARK	1/1	2	0			
25	"	"	TIST	INCM	1065	JE, GM, CT, MELENDIA LUNZ, SHERRI CLARK	1/1		4			
25	"	"	INCM	TEB	1066	JE, GM, CT, ML, SC	1/1	4	2			
30	"	"	TEB	PBI	1067	JE	1/1	2	3			
31	"	"	PBI	JAX	1068	JE	1/1	8				
31	"	"	JAX	APF	1069	JE, ELLEN SPENCER	1/1	8				
31	"	"	APF	PBI	1070	JE, ELLEN SPENCER	1/1	4				
Feb 2	"	"	PBI	TEB	1071	JE, SOPHIE BIDDLE		2	2			
6	"	"	TEB	PBI	1072	JE, GM, CT, SOPHIE BIDDLE, EVA, CELINA, JORDAN, CELINA DUBEN	1/1	2	6			
9	"	"	PBI	TEB	1073	JE, GM, CT, CLARE HAZEL, JESSEL PASHLOW, VERNON, ALAN DONOHUE, MANDY + MRS COYNE	1/1	2	4			
12	"	"	TEB	PBI	1074	JE, GM, JESSEL PASHLOW, LINDA PASHLOW, CT, JEM + MRS COYNE, WARREN SPENCER	1/1	2	6			
I certify that the statements made by me on this form are true.								Page Total	14	38	9	
Pilot's Signature <u>David Rodger</u>								Amount Forward	572.9	709.5	3	
								Total to Date	572.9	7134	2	

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Date 1948 Feb	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			
			From	To					AIRPLANE			
1	C172	N75RR	LNA-F45	LNA			CHARLES WAGNER, HOOD 50L, CONTAINS AIRCRAFT CATEGORY, TURNS TO A VACUUM, UNUSUAL DISTANCE	5/5	8			
7	C172	N75RR	LNA-Y10	PBI-LNA			JE, CM, ET	3/3	20			
14	G1159B	N908JE	PBI	SAF		1075	JE	1/1	39			
15	"	"	SAF	LAS		1076	JE	1/1	13			
15	"	"	LAS	VNY		1077	JE	1/1	7			
18	"	"	VNY	MRY		1078	JE, BOB, KET, 3 FEMALE, 1 MALE		8			
21	"	"	MRY	SAF		1079	JE		15			
22	"	"	SAF	TEB		1080	JE, CM, ET	1/1	33			
27	"	"	TEB	DCA		1081	JE, ET, GWENDOLYN BECK	1/1	6			
27	"	"	DCA	TISS		1082	JE, GWENDOLYN BECK		32			
28	"	"	TISS	PBI		1083	JE, CM, ET, GB, GARY KERNEY	1/1	27			
4	C421	N908BM	PBI	AVO			RAPID COMMUNICATIONS, PSS, PILOTAGE CLUBS PLANS, VOR NAVIGATION, RADAR	1/1	7			
4	C421	"	AVO	LEE			CHARLES WAGNER, CLASS B CIRCULAR NAV VOR NAVIGATION, ADF BEACON	1/1	7			
4	"	"	LEE	PBI			RADAR SERVICES, ARTCC, CLASS B CIRCULAR NAV		10			
11	"	"	PBI	AVO			CHARLES WAGNER - XL OVER 10000 RADAR	1/1	8			
11	"	"	AVO	PBI			CHARLES WAGNER - VOR NAVIGATION, CONTAINS AIRCRAFT CATEGORY	1/1	8			
12	"	"	PBI	EYW			CHARLES WAGNER - RADAR, PILOTAGE, PILOTAGE, TOW LUCKY +1	1/1	11			
12	"	"	EYW	PBI			CHARLES WAGNER - VOR, NIGHT OPS 25 ACTUAL		10			
20	G1159B	N908JE	PBI	PBI		1084	257 FLIGHT ACTOR OPS	1/1	4			
I certify that the statements made by me on this form are true.								Page Total	20	273		
								Amount Forward	5989	71342		
								Total to Date	6009	71615		

CONFIDENTIAL DR_000016

Pilot's Signature



Date 1998	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Address	
MAR 23	G1159B	N908JE	PBI	TEB		1085	JE, GM, GVA ANDERSSON, COLLINS, TERRY, DUBOY, NORTON, 1 male	1/1	2	2
25	"	"	TEB	SAF		1086	JE, GM, ET		4	4
27	"	"	SAF	PBI		1087	JE, GM, DOUG S. BOETTLE, ET	1/0	2	9
31	C172	N5189B	LNA	LNA			CHECK OUT ENCESSA IN	3/3	8	
31	"	"	LNA-PBI-LNA				CHRIS WAGNER - 3 EMERGENCY LANDINGS, NIGHT REQUIREMENTS RECURRENTS TRAINING AT SEMCON		1	3
16	C421	SEMULATOR								
17	"	"					EMERGENCY PROCEDURES			
18	"	"					INSTRUMENT COMPETENCY CHECK			
APR 5	G1159B	N908JE	PBI	TEB		1088	JE, HEATHER MITCHELL, BOBBY MITCHELL, 1 FEMALE, MELINDA LUNGE	1/1	2	5
6	"	"	TEB	W47		1089	JE, 2 FEMALES (KREBY FARMS)	1/1		7
6	"	"	W47	RIC		1090	JE, PAUL MELLON, 2 FEMALES (CHRYSTAL)	1/1		5
6	"	"	RIC	W47		1091	JE, PAUL MELLON, 2 FEMALES	1/1		4
6	"	"	W47	TEB		1092	JE, 2 FEMALES	1/1		7
9	"	"	TEB	BEO		1093	JE, OLIVER SACHS	1/1		6
9	"	"	BEO	TEB		1094	JE, OLIVER SACHS, ROBIN			9
9	"	"	TEB	PBI		1095	JE, GM, GLEN, GVA, COLLINS, JORDAN, DUBOY JE, G. SEHANTZ, WIFE, 2 KIDS		2	3
11	C172	N75RR	LNA-FXE-LNA			1096	CHRIS WAGNER - 3 EMERGENCY LANDINGS, NIGHT REQUIREMENTS RECURRENTS TRAINING AT SEMCON	2/2	1	2
16	G1159B	N908JE	MBUN	MYNN		1096	JE (MET PRICES, SARPA RUSGUSON + KIDS ON THE GROUND)	1/1	6	
16	"	"	MYNN	PBI		1097	JE	1/1	6	

I certify that the statements made by me on this form are true and correct.

CONFIDENTIAL DR_000017

I certify that the statements made by me on this form are true.

Pilot's Signature

David Redden

Page Total	15	226
Amount Forward	6089	71615
Total to Date	5748	71841
	6024	
	5762	

Date 1988	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To						
APR							1018		1	0
17	G1159B	N908JE	PBI	PBI			CLASSIFICATION FOR GPS APPROACHES	1/1	1	0
17	C421	N908GM	PBI	X21			CHRIS WAGNER - PATSY, KRISTY, LAMAR CONDUCT AIRPORT OPERATIONS	1/1	9	
17	C421	"	X21	TIX			SAME AS ABOVE	1/1	1	
17	"	"	TIX	CRG			KRISTY RODGERS, PATSY S+L CLEMBS, DESCENDS, TURNS	1/1	6	
18	"	"	CRG	LAL			PATSY RODGERS, KRISTY S+L CLEMBS, DESCENDS, TURNS	1/1	8	
18	"	"	LAL	PBI			CHRIS WAGNER, LAMAR, KRISTY, PATSY VER. DELIVERY, REDEALS, RADIS CHINA	1/1	1	1
19	G1159B	N908JE	PBI	CMH		1099	JE, CLAR, HAZEL, 1 FEMALE	1/1	2	0
20	"	"	CMH	LUK		1100	JE, GINGER, MANDY LANE	1/1	3	
20	"	"	LUK	TEB		1101	JE, GINGER, MANDY LANE	1/1	1	2
24	"	"	TEB	PBI		1102	JE, GM, COCO, BROWN, ET, LINDA	1/1	2	2
25	C172	N7SRR	LNA-PBI-LNA				CHRIS WAGNER - NO FLAP APPROACH EMERGENCY PROCEDURES - CLASS C	4/4	1	0
25	"	"	LNA	LNA			SHORT, SOFT RESCUE TAKE OFF EMERGENCY PROCEDURES - CHRIS WAGNER	6/6	8	
26	"	"	LNA-PBI-LNA				TRAFFIC PATTERN, EMERGENCY LANDING, CLASS C OPERATIONS	5/5	9	
26	G1159B	N908JE	PBI	TEB		1103	JE, GM, ET	1/1	2	3
MAY	"	"	TEB	PBI		1104	JE, GM, ET, GLEN DUBIN, JORDAN, COLUMA, ANNUNY	1/1	2	5
1	C172	N7SRR	LNA-PBI-LNA				SHORT & SOFT FLAP TAKE OFF, EMERGENCY LANDING, TBS, CLASS C OPERATION	1/1	1	5
3	G1159B	N908JE	PBI	TEB		1105	JE, GM, ET, NADIA, COLUMA, COLUMA JORDAN, ANNUNY, COLUMA, BROWN	1/1	2	3
5	"	"	TEB	BCD		1106	JE, ROBIN	1/1	6	
5	"	"	BCD	TEB		1107	JE, ROBIN, STEVEN		7	

I certify that the statements made by me on this form are true

Pilot's Signature

David R. R. R.

Page Total	40	22	8
Amount Forward	6024	7	184
Total to Date	6064	7	22

CONFIDENTIAL DR_000018

Date 19 <u>99</u> <u>MAY</u>	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ASPL	PLN
7	G1159B	N908JC	TEB	PBI		1108	JE, ET		2	3
9	"	"	PBI	TIST		1109	JE, ET, SHERREE, CLARE HAZEL	1/1	2	0
11	"	"	TIST	TEB		1110	JE, GM, ET, CLARE HAZEL, CLARE KRAE	1/1	3	1
15	"	"	TEB	PBI		1111	JE, MANDY ELLISON	1/1	2	0
17	"	"	PBI	TEB		1112	JE	1/1	2	4
18	"	"	TEB	MDW		1113	GM, ET, SHANNON HEALY, ALBERTO PINO, 1 MALE	1/1	1	6
18	"	"	MDW	SAF		1114	GM, ET, JE, SHANNON, ALBERTO, 1 MALE		2	5
20	"	"	SAF	LAX		1115	JE, GM, ET, ALBERTO, PASCHY, 1 MALE	1/1	1	7
20	"	"	LAX	TEB		1116	GM, ET, ALBERTO, 1 MALE	1/1	4	5
<u>JUN</u> 4	"	"	TEB	PBI		1117	JE, MANDY ELLISON, 1 FEMALE	1/1	2	2
8	"	"	PBI	TEB		1118	JE, GWYNETH BECK, 1 FEMALE	1/1	2	5
12	"	"	TEB	TIST		1119	JE, GM, ET, CLARE HAZEL, MELANIE STANLEY	1/1	3	0
15	"	"	TIST	JFK		1120	JE, GM, ET, CLARE HAZEL, MELANIE STANLEY	1/1	4	3
18	"	"	JFK	PBI		1121	JE, GM, LYNN FLOREANILLA GARY ROXBURG		2	0
21	"	"	PBI	TEB		1122	JE, RALPH ELLISON, LYNN FLOREANILLA GARY ROXBURG	1/1	2	5
23	"	"	TEB	BEO		1123	JE. GARY ROXBURG	1/1		7
23	"	"	BEO	TEB		1124	JE, HENRY ROSOVSKY GARY ROXBURG	1/1	1	2
26	"	"	TEB	PBI		1125	JE, GM, MELANIE LUNTZ GARY ROXBURG	1/1	2	6
TOTAL AT BOTTOM OF PAGE REPORTED TO INSURANCE COMPANY										

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rockwell

Page Total	15	43	7
Amount Forward	6064	7206	9
Total to Date	5802	7206	9
	6079	7206	16

CONFIDENTIAL DR_000019

Date 18 JUL	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ACFT	Category	
5	G1159B	N908JE	PBI	OXC		1126	JE	1/1	2	5	
5	"	"	OXC	TEB		1127	JE	1/1	4		
10	"	"	TEB	PBI		1128	JE, SINGLE BEDDLE, 2 Female	1/1	2	3	
12	C150	49563	JVK	JVK		1	C150 CHECK OUT DAN-CFI	2/2	6		
12	"	N778ME	JVK	JVK		1	JONATHAN M AND - PREFLIGHT, EAS-TEST, ENGINE START, MIXTURE CONTROL, 3/4 TURN	2/2	1	4	
13	"	"	"	"		2	ARROW, TRAFFIC PATTERNS, CLIMBS, TURNS, MCA, FORWARD & SLOD SCOP, DECKING	3/3	1	1	
17	"	"	"	"			EMERGENCY LANDING, NORMAL STOPPAGES	2/2	5		
16	"	"	"	"		3,4	SEMI-THROW MAN, V _y , V _x , STEEP TURNS, MCA, FORWARD SLIP, TAIL, BASIC ROAD PROCEDURES	4/4	1	0	
16	"	"	"	"		5	JONATHAN M AND - EMERGENCY TURNS, DEPARTURE AND ENTRY OF TRAFFIC PATTERN, ALL STOPS, CFI, ATTS	3/3	9		
17	"	"	"	"		6	GO AROUND, TRAFFIC PATTERN, ROAD PROCEDURES, TIRM, S-TURNS, TBP, MCA, ENGINE FAILURE	2/2	1	1	
17	"	N45563	JVY	BQM		1	VOE TRACKING, CSTALLS-POWER ON, OFF, BANK, MCA, CONTROL TOWER OPERATIONS	2/2	8		
17	"	"	BQM	JVY			ATES, GROUND CONTROL, NORMAL TAKE-OFF, LANDING, ROAD PROCEDURES	4/4	8		
17	"	N778ME	JVY	JVY		8	FLIGHT AT VARIOUS AIRSPEEDS FROM CLIMB TO SLOW FLIGHT, FULL STALLS, STALLS FROM VARIOUS ATTITUDES	5/5	1	2	
17	"	"	"	"			CROSSWIND TAKE-OFF & LANDING, DISCENS USING HIGH & LOW PRAG CONFIGURATION, RTO	9/9	8		
18	"	"	JVY (LOF)	IMS		19	CHECKPOINTS AND FLIGHT PLANNING, CLIMB, PITCHING, DEED RECKONING, ALTERNATE DEPART	1/1	1	4	
18	"	"	IMS	JVY		19	V _x , VORTRACING, VOE PASSAGE, VOE RAMP, LEVEL OFF IN DESCENT, CROSSWIND LANDING	1/1	4		
28	G1159B	SIMULATOR	IRW	IRW			RTO, STEEP TURNS, FULL STALLS, REVERSE CLIMB, NO ENGINE LANDING, ILS, SINGLE ENGINE FLIGHT, JET UPSET, WAKE TURBULENCE, DOUBLE CLIMB, FAILURE, SINGLE ENGINE GO AROUND, HOLDING		2	1	
29	"	"	HUB	HOU			WINDSHIELD, HOT HIGH ALTITUDE OPERATIONS, CROUCH PARACHUTE, VOE EMERGENCY DECENT		1	8	
30	"	"	CYS	COS					2	1	
I certify that the statements made by me on this form are true.								43/43		23	2
Amount Forward								6074	7250	6	
Total to Date								6122	7273	8	

CONFIDENTIAL DR_000020

Date 19 38 AUG	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ACROBATIC	GLIDER
3	G1159B	N908JC	PBI	TEB		1136	JG, GM, ADAM, EMMY, RON	1/1	25	
4	"	"	TEB	HTO		1137	JG, MELANIE STORVCS	1/1	7	
4	"	"	HTO	OQU		1138	NO PASSENGERS	1/1	5	
4	"	"	OQU	TEB		1139	JG	1/1	11	
5	"	"	TEB	BED		1140	JG	1/1	8	
5	"	"	BED	MVY		1141	JG	1/1	5	
5	"	"	MVY	TEB		1142	JG	1/1	10	
6	"	"	TEB	CMH		1143	JG	1/1	13	
6	"	"	CMH	TEB		1144	JG	1/1	13	
7	"	"	TEB	TVC		1145	JG, GM, ET, MCLANAN LUMS2		18	
11	"	"	TVC	TEB		1146	JG, GM, ET	1/1	15	
13	"	"	TEB	PBI		1147	JG, GM, ET, PAULA EPSTEIN		24	
17	"	"	PBI	TEB		1148	JG, GM, ET	1/	25	
21	"	"	TEB	SAF		1149	JG, GM, ET, ADAM PERRY LAMP	1/1	36	
24	"	"	SAF	ASE		1150	JG	1/1	8	
22	SCHIEDE SP34	N4424G	OEO	OEO			T.O. & FOW ASSISTED, STANISLAV GLIDES, TURNS, TIKZMBLS, X-COUNTRY CRUISE			9
25	G1159B	N9108JC	ASE	VNY		1151	JG, JDE PRIGANO, GINGU DOLAN BOKIC	1/	19	
29	"	"	VNY	PBI		1152	JG	1/1	49	
9-1	"	"	PBI	TEB		1153	JG, GM	1/1	24	

I certify that the statements made by me on this form are true.

Signature: *David Paden*

Page Total	1614	317	9
Amount Forward	6122	7273	8
Total to Date	6138	7305	9

CONFIDENTIAL DR_000021

Date 1998	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Airplane	Glider
9-4	G1154B	N9081C	TEB	TEST		1154	JE, GM, CT	1/1	37	
4	"	"	TEST	PBI		1155	JE, GM, CT	1/1	25	
8	"	"	PBI	TEB		1156	JE, GM, CT, MANDY ELISEN	1/1	27	
13	"	"	TEB	SAF		1157	JE, GM, CT, ALBERTO + LINDA PINTO	1/1	40	
9/15	GROB 103HA	N307BG	DEB	CC			TOWING THERMALING			
9/15	G103 HA	N307BG	DEB	CC			UNASSISTED T.O.L. Thermaling			3
9/15	G103 HA	N307BG	DEB	CC			UNASSISTED T.O.L. Thermaling			4
9/15	G103 HA	"	"	CC			UNASSISTED TOW # CANDING IN LIGHT			5
9/15	"	"	"	CC			UNASSISTED TOW # CANDING THERMALING			3
9/15	"	N307BG	"	CC			STALLS, UNPLANNED STALLS			6
9/15	"	N307BG	"	CC			PATTERN TOW			3
1/17	G1154B	N9081E	SAF	ASC		1158	JE, ET	1/1	6	
19	"	"	ASC	IAD		1159	JE, ET, LARRY SUMMERS, CHRISTOPHER	1/1	30	30
19	"	"	IAD	TEB		1160	JE, ET, GUY + DAWN BECK		6	
25	"	"	TEB	DCA		1161	JE, LYNN FORESTER	1/1	7	7
25	"	"	DCA	IAD		1162	REPOSELON FOR CUREON		1	7
25	"	"	IAD	TEB		1163	JE, LYNN FORESTER		7	7
26	"	"	TEB	PBI		1164	JE, GM	1/1	21	
06/8	"	"	PBI	TEB		1165	JE, CT, LUBA, DARA		22	
I certify that the statements made by me on this form are true.								Page Total	8/6	224
Pilot's Signature: <i>David Rodgers</i>								Amount Forward	6138	7305
								Total to Date	6146	7328

CONFIDENTIAL DR_000022

Date 19 <u>98</u> <u>563</u>	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					AIRPLANE	GLIDER	
6	G-1159B	N908JC	TEB	BED		1166	JE, RHONDA SHERKER	1/1	6		
6	"	"	BED	TEB		1167	JE, RHONDA SHERKER + WINGMAN		7		
9	"	"	TEB	OCA		1168	JE, ET, ADAM PERRY LANG	1/1	7		
9	"	"	OCA	PBI		1169	JE, GM, ET, AP		20		
12	"	"	PBI	TEB		1170	JE, GM, ET, AP	1/	23		
15	"	"	TEB	PBI		1171	JE, SOPHIE BIDDLE		21		
19	"	"	PBI	TEB		1172	JE, SOPHIE BIDDLE	1/	22		
21	"	"	TEB	BED		1173	JE	1/1	6		
21	"	"	BED	TEB		1174	JE, ALAN PERSHOWITZ	1/1	8		
23	"	"	TEB	PBI		1175	JE, GM, ET, GWYNDOLYN BECK	1/1	23		
NOV 7	"	"	PBI	TEB		1176	NO PASSENGERS	1/1	23		
7	"	"	TEB	PBI		1177	JE		23		
10	"	"	PBI	TEB		1178	JE	1/	25		
14	"	"	TEB	TIST		1179	JE, ET, CLARE HAZEL FRANCES	1/1	32		
15	"	"	TIST	PBI		1180	JE, GM, CLARE HAZEL, ET, FRANCES	1/1	24		
16	"	"	PBI	CMH		1181	JE, GM, ET, CLARE HAZEL, FRANCES	1/1	20		
16	"	"	CMH	TEB		1182	JE, GM, ET, FRANCES	1/	11		
20	"	"	TEB	TIST		1183	JE, GM, ET, AP	1/1	33		
1	C421B	N908GM	PBI - NASH	W-PBI				3/3	10		
I certify that the statements made by me on this form are true.								Page Total	16/12	34	4
Pilot's Signature <u>David R. Ransom</u>								Amount Forward	6146	7328	4
								Total to Date	6152	7362	8

CONFIDENTIAL DR_000023

Date 1958 Nov	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			
			From	To					Fixed Wing	Wing	Helicopter	
26	G-1154B	N908JC	TIST	PBI		1184	IC, GM	1/	25			
29	"	"	PBI	TEB		1185	IC, GM, MARK, PISTON, LYNN, SUGGESTOR, 1/2 300, SUP. AIR, BERRY, CICH, DUBAN, CLOTH, TUBER	1/	25			
Dec 4	"	"	TEB	PBI		1186	IC, ALEXIA	1/1	22			
8	"	"	PBI	TIST		1187	IC, SODIE BIDDLE	1/1	23			
8	"	"	TIST	SAV		1188	OPS 2 INSPECTION	1/	30			
31	"	"	SAV	PBI		1189	OPS 2 COMPLETED		9			
1959 Jan 1	"	"	PBI	TIST		1190	REPOSITION	1/1	21			
1	"	"	TIST	PBI		1191	IC, GM	1/1	25			
4	"	"	PBI	TEB		1192	IC, GM, MARK, EPSTEIN, MANDY KRON, GLENN, MORGENTHAU	1/1	22			
9	"	"	TEB	ABY		1193	IC, ALEXIS	1/1	25			
10	"	"	ABY	SAY		1194	IC, ALEXIS	1/	30			
12	"	"	SAY	VNY		1195	IC, ALEXIA	1/	16			
15	"	"	VNY	PBI		1196	IC, TEAM WUK		42			
19	"	"	PBI	TIST		1197	IC, GM, ET	1/	21			
24	"	"	TIST	TEB		1198	IC, GM, ET, ULGA, CILIP, PIER	1/1	36			
29	"	"	TEB	PBI		1199	IC, GM, ET, AR, P, 100, CLEW, COUNG, TOMMY, BERRY SEE MANEUVER INDEX: A, B	1/	23			
31	G-1154B	N908JC	PMP - PB	- PMP		1					1 3	
Feb 1	G-1154B	N908JC	PBI	TEB		1200	IC, GM, ET, AR, EVA, COUNG, JORDAN, NANNY	1/1	25			
2	206B3	SAFH	PMP	PMP		2	A, E				8	
I certify that the statements made by me on this form are true.								Page Total	14/8	420		20
Pilot's Signature: <u>David Rodriguez</u>								Amount Forward	6162 5894	73628	33	
								Total to Date	6176 5892	74048	33	26

CONFIDENTIAL DR_000024

Date 19 <u>84</u> <u>Feb</u>	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					Aerobically	GLIDER	Radio
3	206B3	59PH	PMP	PMP		3	A-EF				
4	"	"	"	"		4	A-E - Full controls				
5	G-1159B	N908JC	TEB	PBI		1201	JE, GM, ET, MELINDA STARNES, MELINDA LUNTZ, LARRY HARVEY	1/1	2		
02/05	206B3	59PH	PMP	PMP		5	A-E - Advanced maneuvers				
02/06	206B	59PH	PMP-PBI-PMP			6	A-E / start of C & D				
3/7	"	"	"	"		7	A-15				
7	G-1159B	N908JC	PBI	TEB		1202	JE, GM, ET, MELINDA LUNTZ, MELINDA WALKER, LARRY HARVEY		2		
9	"	"	TEB	TEST		1203	JE, GM, ET, AP, PRINCE ANDREW STEVE BURGESS		3	3	
12	"	"	TEST	PBI		1204	JE, GM, ET, AP, PRINCE ANDREW, STEVE BURGESS, CANDACE LYN BEE, LARRY HARVEY, MONTY ALLEN	1/1	2	6	
13	206B3	59PH	PMP-LCL	PAT-PMP			A-E / start of C				2
02.15	BH206B2	N7010H	VNY	PIRU VNY			PARADE, HANDOFFS, YETI, PCH, LEE, A-WHITE DOWN TOLD NEVER, KICK, STOPS, 5/1, AVES, COL AVES	5			1
14	G-1159B	N908JC	PBI	SAF		1205	JE, GM, LARRY KALSON	1/1	3	6	
15	"	"	SAF	VNY		1206	JE	1/1	1	6	
16	B206BE	N7010H	VNY -	PIRU - VNY			THREE PATTERNS, APPROACHES, ONE HOURS HANG, PCH, TURNS, APPROACHES				1
17	G-1159B	N908JC	VNY	MRY		1207	JE + 3	1/1			
20	"	"	MRY	SAF		1208	JE	1/1	1	9	
21	"	"	SAF	TEB		1209	JE, GM, JENNIFER, SHARON, CLINGENSEN	1/1	3	5	
24	"	"	TEB	PBI		1210	JE, ET, EVA, CLEVA, JORDAN, NANNY, HEATHON, JO ANNE		2	4	
26	206L3	500JA	PMP	PMP			Reviewed A-E, Demo - H, J, T V				1

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodriguez

Page Total	7/5	23	8			11	2
Amount Forward	6176 5892	7464	8	3	3	2	0
Total to Date	6183	7428	16	3	3	12	2

CONFIDENTIAL DR_000025

Date 1999	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ADAPLAN	GLIDER	WHEELS
27	206L3	NS00JA	PMP	PMP			A-F, J, M, + V / Demo - N				
03/01	206L3	500JA	PMP	PMP			C, D, M, + V				13
03/11	206B2	N70PH	PMP-LNA	PBE-PMP			ENG TRAINING, INCLD. C262				11
03/02	206L3	500JA	PMP	PMP			N, H, + J				41
03/03	206L3	500JA	PMP-PBI-PMP				A-F				18
03/04	206L3	500JA	PMP-PBI-BAT-PMP				A, H (Pre-solo prep)				10
03/05	206L3	500JA	PMP-PBI-LNA-PMP				A, H (Pre-solo prep)				15
03/06	206L3	500JA	PMP-PBI-LNA-PMP				Finished prep / 1st solo at PMP				16
3/17	G-1159B	N908JC	PBI	TCB		1211	JC, GM, CT, MGL-DA LUNT, NIX 3 GEARLES	1/	25		11
3/13	PA28-161	NS10PU	JVY	GRD			NAVIGATION, A/C CLEARANCE AND PROCEDURES FLIGHT BY REFERENCE TO INSTRUMENTS	1/1	42		
3/13	PA28-161	NS10PU	GRD	ORL			NAVIGATION SYSTEMS, PARTIAL PANEL, A/C COMMUNICATION, ILS APPROACH, IFR, ALTIMETER TRAFFIC PATTERN	1/1	48		
3/16	206L3	500JA	PMP	PMP							19
3/17	C421B	N908GM	PBI	EYW			NAVIGATION, MULTIPLE OPERATIONS, REDUCED NAVIGATION, MULTIPLE OPERATIONS	1/1	15		
3/17	C421B	N908GM	EYW	PBE			NAVIGATION, MULTIPLE OPERATIONS, REDUCED NAVIGATION, MULTIPLE OPERATIONS	1/1	25		
3/16	PA28-161	NS10PU	ORL	DBN			NAVIGATION, MULTIPLE OPERATIONS, REDUCED NAVIGATION, MULTIPLE OPERATIONS	1/0	40		
3/19	PA28-161	NS10PU	DBN	JVY			NAVIGATION, MULTIPLE OPERATIONS, REDUCED NAVIGATION, MULTIPLE OPERATIONS	1/1	45		
3/21	G1159B	N908JC	TEST	TCB		1214	JERRY, TIFFANY, GRANGA, CLEMENTINE HAMBRO, ENCL DOERRIC	1/	42		
3/23	206L3	500JA	PMP-2IS	SCA-PMP			DUAL CROSS COUNTRY				23
3/23	206L3	500JA	PMP	PMP			BCD				14

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodger

Page Total	7/4	282		191
Amount Forward	6183	74286	33	132
Total to Date	6190	74568	33	323

CONFIDENTIAL DR_000026

Date 19 <u>74</u> <u>AM</u>	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ACROSS COUNTRY	GLIDING	WHEEL
3/23	206L3	500JA	PMP-NORTHWEST-PMP				12 TAKEOFFS WITH WINGS / Q	(42)			16
3/24	206L3	500JA	PMP-SUA-2IS-PMP				SOLO CROSS COUNTRY				21
3/24	206L3	500JA	PMP-XSI-PMP				SOLO CROSS COUNTRY				15
3/25	G1159B	N908JC	TEB	PBI		1215	JE, CF, OP, EV, CLEMA, JORDON, NAPP		25		CONFIDENTIAL DR_000027
3/26	206L3	500JA	PMP-LNA-PMP				SOLO LOCAL				20
3/26	206L3	500JA	PMP-PHX-PMP				P, Q	(3)			16
3/27	G1159B	N908JC	PBI	TEST		1216	JE, ET, AP, 2 FEMMES	1/1	28		
3/24	"	"	TEST	PBI		1217	SHELLEY AND LEWIS TEFFANY KATHRYN CRANZA	1/1	29		
3/30	"	"	PBI	TEB		1218	REPOSITION TO TEB	1/1	25		
3/31	"	"	TEB	TEST		1219	GM, ALBERTO L. LINDA PIERO, PIRELLA AUGUSTO, FRANCESCO VERONICA	1/1	35		
3/31	"	"	TEST	PBI		1220	JE, GM, ALBERTO L. LINDA, ET, OP, PIRELLA AUGUSTO, FRANCESCO VERONICA	1/1	27		
4/2	"	"	PBI	ABQ		1221	JE, AP, ALBERTO L. LINDA, PIRELLA, FRANCESCO VERONICA	1/1	40		
4/4	"	"	ABQ	TEB		1222	JE, GM, CLAUDIO HAZEL	1/1	35		
4/5	206L3	500JA	PMP	PMP			SOLO LOCAL				6
4/5	206L3	500JA	PMP-LA-PMP				A-I W/ FOR PVT TEST				12
4/6	206L3	500JA	PMP-BCT-PMP				A-I, M, N PREP FOR PVT TEST				17
4/7	206L3	500JA	PMP	PMP			A-E, G, L, O, R, P, V				16
4/8	G1159B	N908JC	TEB	PBI		1223	JE, GM, AP, ENLA, KERSTEN	1/1	23		
4/10	206L3	500JA	PMP-LNA-PBI-PMP				A-H, J, L, M, N, R, + V				10
I certify that the statements made by me on this form are true.								Page Total	8/7	262	158
Pilot's Signature <u>David Rodman</u>								Amount Forward	6190	74568	33323
								Total to Date	6198	74830	33481

Date 10/19 APR	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					Fixed Wing	GLIDER	HELICOPT
11	G-1159B	N908JC	PBI	TEB		1224	IC, GM, ET, AP, CHAYLES, MANIZED, 2. FEMALE, ENCA	✓	3	2	
13	206L-3	SOOJA	PMP	PMP			IC, GM, ET, AP, CHAYLES, MANIZED, 2. FEMALE, ENCA				
14	206L-3	SOOJA	PMP	PMP			IC, GM, ET, AP, CHAYLES, MANIZED, 2. FEMALE, ENCA				
16	G-1159B	N908JC	TEB	PBI		1225	IC, ET, ALAN DERSHOWITZ, INAGE	1/1	7		
16	"	"	MVY	BOS		1226	IC, ET, 1 MILE	1/1	5		
16	"	"	BOS	PBI		1227	IC, ET	1/1	3	1	
20	"	"	PBI	TEST		1228	IC, GM, ET	1/1	2	4	
25	"	"	TEST	TEB		1229	IC, TERRY GRAMZA, DANIEL HILL, ALEXA WALLACE	1/1	4	0	
27	"	"	TEB	TEST		1230	IC, SOPHIE BIDDLE, 1 FEMALE	1/1	3	4	
2	"	"	TEST	TEB		1231	IC, SOPHIE BIDDLE, TERRY GRAMZA, DANIEL HILL, ALEXA WALLACE	1/0	3	7	
7	206L-3	SOOJA	PBI	PBI		1232	IC, GM, ET, AP, CHAYLES, MANIZED, 2. FEMALE, ENCA	✓	2	3	
7	"	"	PMP-LNA-PBI				Return/started CPL training				9
7	"	"	PBI	PMP			Return/started CPL training				1
3	"	"	PMP-LNA-PBI				H, 1 (Right), incl. 0-speed & S-turns				8
8	"	"	PBI-LNA-PMP				H, 1 (Left)				1
10	G-1159B	N908JC	PBI	BED		1233	IC, GM, CLARKE HAZEL, TERRY GRAMZA, ENCA DOERRIC	1/1	2	7	
10	"	"	BED	TEB		1234	IC, GM, CLARKE HAZEL, TERRY GRAMZA, ENCA DOERRIC		9		
16	206L-3	SOOJA	PMP	PMP			H, 1 (Left + Right 500-700)				1
I certify that the statements made by me on this form are true.											5
Pilot's Signature <u>David Redfern</u>									Page Total	26	9
									Amount Forward	6198	11
									Total to Date	6198	48
										5415	59

CONFIDENTIAL DR_000028

Date 1994	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					APPROPRIATE	GLIDER	HELICOPTER
17	G-1159B	N908JE	TEB	SAF		1235	JS, RAN	1	3		
17	"	"	SAF	ABQ		1236	JS, RAN		2		
18	"	"	ABQ	DAL		1237	JS, GR, TERRY, GRAMZA	1/1	1		
18	"	"	DAL	PBI		1238	JS, GR, TERRY, GRAMZA		2		
19	2000TB	N500JA	PBI-LNA	PBI			STRATHEIN + 1X6 AUTOCROTIONS				1
20	"	"	PMP	PMP			M, V, & Approaches to the surface, and noise sensitive proc.				1
21	"	"	PMP	DAB			D- Via Shoreline				1
21	"	"	DAB	PBI			D- Via 1-95				2
21	"	"	PBI	PMP			Return				1
23	G-1159B	N908JE	PBI	TEB		1239	JS, GM, GR, TERRY, GRAMZA	1/1	2		7
FLIGHT TIMES REPORTED TO INSURANCE COMPANY											
27	G-1159B	N908JE	TEB	PBI		1240	JS, GM, GR, GUY, MARY, BOLE, CLENDON, GUY, GUY, JORDAN, MARY, BOLE, BOLE	1/1	2		3
29	"	"	PBI	TEST		1241	JS, GM, GR		2		3
30	"	"	TEST	PBI		1242	JS, GM, GR	1/1	2		8
31	"	"	PBI	SAF		1243	JS, GM, GR	1/1	3		7
JUN 4	"	"	SAF	PBI		1244	JS, GM, GR, TERRY, GRAMZA	1/1	3		2
7	"	"	PBI	TEB		1245	JS, GM, GR, TERRY, GRAMZA	1/1	2		5
9	"	"	TEB	PBI		1246	JS, GM, GR, MARY, GUY, TERRY, GRAMZA		2		3
15	"	"	PBI	TEB		1247	JS, GM, GR, TERRY, GRAMZA, GUY, BOLE	1/1	2		5

I certify that the statements made by me on this form are true.

Pilot's Signature

Daniel R. R. R.

Page Total	9/7	32	1	6	1
Amount Forward	62.07	59.15	7509	9	33
Total to Date	62.16	59.15	7509	9	33

CONFIDENTIAL DR_000029

Date 18 JUN	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					Propeller	Glider	Helicopter
25	IGNITA	N282A	PBE-LNA	PBI			STALL, EMERGENCY, CRITICAL ATTITUDE RECOVERY, EMERGENCY LANDING, SLOW FLIGHT	6/6	1	3	
19	G1159B	N908JE	TEB	PBI	1248		JG, GM, ET	1/1	2	4	
27	"	"	PBI	TEB	1249		JG, ET, SHELLEY	1/1	2	5	
29	"	"	TEB	BED	1250		JG	1/1	0		
29	"	"	BED	TEB	1251		JG		1	0	
JUL	"	"	TEB	PBI	1252		JG, ET, TIFFANY GRANZA	1/1	2	3	
2	KASAWA	NG910A	FPR	FPR			CHECK OUT, STALL, STEEP TURN, EMERGENCY LANDING, RECOVERY	5/5	1	0	
3	G1159B	N908JE	PBI	TEST	1253		JG, CLARE HAZEL, TIFFANY GRANZA	1/1	2	6	
4	"	"	TEST	TEB	1254		JG, CLARE HAZEL, TIFFANY GRANZA	1/1	3	7	
6	Be11 206 B-111	N16909	PMP-SUA	PMP			DUAL CROSS COUNTRY, AF NIGHT MORE THAN 30 NM				2 2
7	"	"	PMP-X44-LNA-fmp				SOLO NIGHT				2 3
13	"	"	PMP-X44-PMP				SOLO NIGHT				2 8
16	DA20	N125MF	HWD	HWD			Police Pilot, Emergency Out ICD, ARROW, 1,000 FT, 1000 FT	2/2	4		
16	DA20	"	HWD-PBE-HWD				JEFFREY EPSTEIN, 1,0 TAKE OFF, TAKE OFF SLOW FLIGHT, RECOVERY, LANDING	3/3	3	4	
15	G1159B	N908JE	TEB	PBI	1255				2	5	
22	"	"	PBI	SAF	1256		JG, GM, ET	1/1	3	4	
25	"	"	SAF	VNY	1257		JG, GM, ET, LESA	1/1	1	7	
29	"	"	VNY	OAK	1258		JG, SHELLEY	1/1	9		
29	"	"	OAK	SAF	1259		JG, SHELLEY	1/1	2	2	
I certify that the statements made by me on this form are true.								Page Total	26 24	32	6
								Amount Forward	6216 5922	7542	0
									6242		

CONFIDENTIAL DR_000030

Date 19__	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ADP/DM	GLER	HLER
JUL 29	G1154B	N908JE	SAF	PBI		1262	JG, SHELLEY		3	5	
AUG 4	"	SIMULATOR	JFK	JFK			STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB RETRACTED POWER OFF, HOLDING, 14 mile fix off STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB		3	8	
5	"	"	"	"			STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB		3	8	
6	"	"	"	"			STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB		2	7	
7	"	N908JE	TEB	PBI	1262	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	2	3	
8	"	"	PBI	TEB	1263	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	2	4	
11	"	"	TEB	PBI	1264	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	2	7	
14	"	"	PBI	MTA	1265	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	1	4	
14	"	"	MTA	TEST	1266	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	1	4	
18	"	"	TEST	TEB	1267	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	2	6	
19	ZUGL3	72PH	FL	LNA			STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB		2	6	
23	G1154B	N908JE	PBI	TEST	1268	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	2	6	
26	"	"	TEST	PBI	1269	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	2	7	
28	"	"	PBI	TEB	1270	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	2	5	
SEP 1	"	"	TEB	AGC	1271	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	1	0	
1	"	"	AGC	CMH	1272	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	1	7	
2	"	"	CMH	TEB	1273	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	1	4	
2	"	"	TEB	SAF	1274	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB		3	7	
5	"	"	SAF	SAN	1275	JG, SHELLEY	STEEL TOWER, STALLS, WAKE TURBULENCE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB 14 mile fix off, DOUBLE ENGINE FAILURE, CLIMB	1	1	7	

I certify that the statements made by me on this form are true.

Pilot's Signature

Page Total	13/9	43	4	1	4
Amount Forward	6142	7574	6	3	729
Total to Date	6254	7618	0	3	743

CONFIDENTIAL DR_000031

Date 1999	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			
			From	To					Fixed Wing	CLIPPER	HELICOPTER	
5	G-1159B	N908JC	SAN	SAF	1276	JE, SHANNON HEALY	1/1	1	6			
7	"	"	SAF	TEB	1277	JE, CLARE, VICTORIA HAZEL, ADAM	1/1	3	5			
8	"	"	TEB	CMH	1278	JE, CLARE HAZEL	1/1	1	4			
8	"	"	CMH	TEB	1279	JE, CLARE, MARSHALL, NALL		1	3			
9	"	"	TEB	PBI	1280	JE, ELIZABETH		2	5			
13	"	"	PBI	TEB	1281	JE, GM, PAUL, EPSTEIN, MANDY, RALPH, ELLISON, CLARE HAZEL	1/1	2	4			
17	"	"	TEB	PBI	1282	JE, GM, PAUL, EPSTEIN, ET, CLARE HAZEL		2	4			
19	C-172	N2388L	LNA	LNA		A/C OUT, SAT. TILL 11:00 AM (10/10/99)	2/2	7				
20	G-1159B	N908JC	PBI	TEB	1283	JE, GM, CLARE, ET	1/1	2	5			
22	"	"	TEB	PBI	1284	JE, ET, AP		2	6			
23	C-172	N2388L	LNA	FXG		ED AMATO CFI RENEWAL	1/1	1	1			
23	"	"	FXG	LNA		ED AMATO CFI RENEWAL	1/1	5				
25	G-1159B	N908JC	PBI	TEST	1285	JE, GM, AP, SHELLEY HARRISON	1/1	2	5			
26	"	"	TEST	TEB	1286	JE, GM, AP, SHELLEY HARRISON	1/1	3	8			
27	"	"	TEB	TEST	1287	JE, SHELLEY LEWIS	1/1	3	5			
9	"	"	TEST	PBI	1288	JE, SHELLEY LEWIS	1/1	2	6			
11	"	"	PBI	SAF	1289	JE	1/1	3	7			
12	"	"	SAF	TEB	1290	JE, SOPHIE BIDDLE	1/1	3	5			
14	"	"	TEB	BED	1291	JE, GM, AP, AUDREY RAIMBAULT, ET	1/1	7				
I certify that the statements made by me on this form are true.								Page Total	16/14	42	8	
Pilot's Signature <u>David Rodgers</u>								Amount Forward	6254	7618	0	3 3 74 3
								Total to Date	5969	7660	8	3 3 74 3

CONFIDENTIAL DR_000032

Date 1999 OCT	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					Propeller	Glider	Helicopter
14	G-1159B	N908JG	BED	PBI		1292	JG, GM, ET, AP, AUDREY RAIN BAULT		29		
16	"	"	PBI	TIST		1293	JG, GM, AUDREY RAIN BAULT	1/1	25		
18	"	"	TIST	TGB		1294	JG, GM, AUDREY, MELINDA LUNTZ	1/1	36		
21	"	"	TGB	PBI		1295	JG, GM, ET	1/1	27		
27	"	"	PBI	TGB		1296	JG, ET, GWYNOLYN EGGE, MR. BROWN FREYA WESING	1/1	24		
29	"	"	TGB	PBI		1297	JG, GM, ET, CLARE HAZEL		24		
31	"	"	PBI	TGB		1298	JG, GM, ET, CLARE HAZEL		25		
NOV 5	"	"	TGB	BED		1299	JG, SHELLY ANNE LEWIS	1/1	8		
5	"	"	BED	PBI		1300	JG, SHELLY ANNE LEWIS	1/1	28		
9	"	"	PBI	TGB		1301	JG, ET GARY ROXBURGH	1/1	26		
11	"	"	TGB	SAF		1302	JG, AP, ALBERTO PINTO GIC GARY ROXBURGH		40		
11	"	"	SAF	VNY		1303	JG GARY ROXBURGH		17		
13	"	"	VNY	SAN		1304	JG GARY ROXBURGH		7		
13	"	"	SAN	SAF		1305	JG GARY ROXBURGH		16		
14	"	"	SAF	TGB		1306	JG, AP, ALBERTO PINTO, I MALIC GARY ROXBURGH		36		
16	"	"	TGB	PBI		1307	JG GARY ROXBURGH	1/1	24		
18	"	"	PBI	TGB		1308	JG	1/1	25		
19	"	"	TGB	PBI		1309	JG, MANDY ELISON, JEAN MICHEL CATY		25		
22	"	"	PBI	TIST		1310	JG, GM, ET, JEAN MICHEL GATHY		22		
I certify that the statements made by me on this form are true.									Page Total	9/7	464
Pilot's Signature <i>David Rodman</i>									Amount Forward	6270 5909 6279	76608 33 743
									Total	7777	212

CONFIDENTIAL DR_000033

Date 1999 NOV	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ADRA-ANG	GLIDER	HELICOPTER
25	G-11590	N908JE	TEST	PBI		1311	JG, GM, ET	1/	26		
28	"	"	PBI	TGB		1312	JG, GM, ET, AP, GLEN, EVA, CELENA, JORDAN NORMAN, P. BLOTT		24		
30	"	"	TGB	SAF		1313	JG, GM, ET, AP, CLARK & VICTORIA HAZEL		39		
DEC 3	"	"	SAF	VNY		1314	JG, GM, ET	1/1	18		
4	"	"	VNY	PBI		1315	JG, ET		46		
7	"	"	PBI	TEST		1316	JG	1/	23		
7	"	"	TEST	PBI		1317	RETURN FOR CMP CARDS		27		
2000 JAN 4	"	"	PBI	TGB		1320	JG, GM, ET, AP, EVA, CELENA, JORDAN MICHAEL WINTZ	1/1	24		
6	"	"	TGB	PBI		1321	JG, SOPHIE BLOTT, 1 FEMALE		27		
8	"	"	PBI	ABY		1322	JG	1/1	12		
8	"	"	ABY	PBI		1323	JG		11		
10	"	"	PBI	TGB		1324	JG, SOPHIE, JOEL ASHCOW	1/1	24		
12	"	"	TGB	TEST		1325	JG, AP, SOPHIE, SHELLEY		33		
16	"	"	TEST	TGB		1326	JG, AP, SOPHIE, SHELLEY LEWIS	1/1	41		
24	206L3	N72PH	PMP	PMP			HAVER AUTO'S FULL AUTO'S, STUCK DOORS, TIRE RUPTURE FAILURE		15		
24	206L3	"	PMP	PMP			EMERGENCY LANDING, 150 FULL AUTO'S BOTH PERIODS, ENGINE FAILURE ON TAKEOFF, SLOPED		15		
25	"	"	PMP	PMP			NO HYDRAULICS, STUCK DOORS, L.T. SETTLING WITH POWER, CONTINUED APPROX		20		
28	G1159-13	N908JE	TGB	PBI		1327	JG	1/1	26		
31	"	"	PBI	SAF		1328	JG, GM, ET, AP FRANKLIN GILBERT CLARK HAZEL	1/1	41		
I certify that the statements made by me on this form are true.								Pago Total	9/7	44	2
Pilot's Signature <i>St. James R. R. R.</i>								Amount Forward	6279 5976	7707	2
								Total to Date	6279 5976	7707	2

CONFIDENTIAL DR_000034

Date 2020 Feb	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ACRPMG	CLJRA	HGCELSM
2	G1154-B	N908JE	SAS	VNY		1324	JS-15 ST. AP, FRANKS (COP) ENDS CLARE INTEL	1/1	18		
2	"	"	VNY	TEB		1330	GM ST. AP, CLARE INTEL		47		
3	"	"	TEB	PBE		1331	NO MANEUVERS 72 MONTH INSPECTION OBS, PATENT		25		
7	206L3	N72PH	PMP	PMP			REVIEWED A-G & H				12
8	206L3	N72PH	PMP-NW-PMP				COMMERCIAL PREP G, H, I - INCL. UNUSUAL ATT.				15
9	206L3	N72PH	PMP-NW-PMP				COMMERCIAL PREP G, H, I, S, V & DGE maneuvers				15
9	206L3	N72PH	PMP-NW-PMP				COMMERCIAL PREP H & I incl. X-Ning techniques				12
11	206L3	N72PH	PMP-NW-PMP				COMMERCIAL PREP C, G, H, I & O				16
11	206L3	N72PH	PMP-NW-PMP				CALL PREP COMPLETE REVIEWED I, incl. ext. shire				11
14	206L3	N72PH	PMP	HST							126
14	206L3	N72PH	HST	PMP			QUICK REVIEW - G, I, N, & R				13
15	206L3	N72PH	PMP	FLL							4
15	206L3	N72PH	FLL	PMP							3
15	206L3	N72PH	PMP	FXE			Domestic Ppt. Release with Helicopter Chatter "Pilot's" Redacted for 170-GURP-20-2				8
15	206L3	N72PH	FXE	PMP							2
16	206L3	72PH	PMP-LCL-PMP				IFR/LI				13
16	206L3	72PH	PMP-LCL-PMP				IFR/L 7 & 8, incl. - 9	1-NDB FXE			19
22	206L3	72PH	PMP-FXE-PMP				IFR/L 7, 8, & 9, incl. - 10	1-NDB FXE			17
23	EC120B	121TH	PBE	PBE			MDRX MCRSC				3

I certify that the statements made by me on this form are true.

Pilot's Signature

David Redgen

Page Total	1	90		169
Amount Forward	6288 5183	77514	33	793
Total to Date	6289 5984	77604	33	962

CONFIDENTIAL DR_000035

Date 1960 FEB	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ACFT	CL	FL
23	206L3	N72PH	PMP-FXE	PMP			IFR / L7, 8, +10	1			
24	206L3	N72PH	PMP-FXE	PMP			IFR / L6, 7, +10	1			
25	206L3	N72PH	PMP-FXE	PMP			IFR / L7 + 7	1			
26	206L3	N72PH	PMP-LNA	PMP							
27	"	"	PMP	FMY							
28	"	"	FMY	URB							
29	"	"	URB	FXE-PMP							
2	"	"	PMP-FXE	PMP			IFR / L1, 3, 4, 5, 9, +10	1			
2	"	"	PMP-FXE-LNA	PMP			IFR / L2, 6, 7, 9, +10	1			
3	"	"	PMP	PMP			IFR / L4, 6-8, 16, +17	1			
3	"	"	PMP	LNA			IFR / L6, 8, +12 (auto)	1			
10	"	"	PMP	PMP			IFR REVIEW / L9 +10	1			
11	"	"	PMP	PMP			IFR REVIEW / L9 +10	1			
12	"	"	PMP-LNA	PMP			IFR REVIEW / L9 +10	1			
13	G-1159B	N9085C	PBI	PBI			IFR REVIEW / L9 +10	1			
14	"	"	"	"			IFR REVIEW / L9 +10	1			
15	"	"	PBI	TGB			IFR REVIEW / L9 +10	1			
16	"	"	TGB	PBI			IFR REVIEW / L9 +10	1			
17	"	"	PBI	TGB			IFR REVIEW / L9 +10	1			
I certify that the statements made by me on this form are true.											
Page Total								1	5	7	16
Amount Forward								1	5	7	16

CONFIDENTIAL DR_000036

CONFIDENTIAL DR 000037

Date 2002 JUN	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ACR PLANE	CGC/CR	ITG/ELC/ET
30	G-1159B	N908JE	PBI	TIST		1356	REPOSITION	1/0	28		
30	"	"	TIST	PBI		1357	JG, GM, CT, AP, SOPHIE BIDDLE		25		
JUL	"	"	PBI	TEB		1358	JG, CT, AP, GM, SOPHIE BIDDLE, MELINDA HUNT	1/	25		
5	"	"	TEB	LFPB		1359	JG, GM	1/1	69		
6	"	"	LFPB	LIGO		1360	JG, GM	1/	20		
9	"	"	LIGO	GMMX		1361	JG, GM	1/1	29		
11	"	"	GMMX	GMFF		1362	JG, GM	1/1	9		
11	"	"	GMFF	LEBB		1363	JG, GM	1/1	19		
11	"	"	LEBB	EGGW		1364	JG, GM	1/	17		
12	"	"	EGGW	EGAA		1365	JG, GM	1/1	10		
12	"	"	EGAA	BGR		1366	JG, GM	1/	64		
12	"	"	BGR	TEB		1367	JG, GM		11		
14	"	"	TEB	PBI		1368	JG, SHELLEY LEWIS	1/1	25		
19	"	"	PBI	TEB		1369	JG, SHELLEY LEWIS GARY ROXBOROUGH	1/1	25		
19	"	"	TEB	SAC		1370	JG, GM, CT, AP, SOPHIE, JASMINE 1 MILE		41		
AUG 20	"	SIMULATOR	JFK	JFK			STEPTURNS, STALLS, SLOW FLIGHT, RETRACTED TAIL - OK		39		
3	"	"	JFK - TEB - SWF				SINGLE ENGINE APPROACHES, ELECTRICAL FAILURES, HYDRAULIC FAILURES		40		
4	"	"	JFK - SWF - JFK				ENGINE EMERGENCY DESCENT, NOB APPROACHES, ENGINE MALFUNCTIONS		41		
21	"	N908JE	PBI	SAC		1378	JG, GM, CT, AP	1/	35		
I certify that the statements made by me on this form are true								Page Total	127	57	2
Amount Forward								6306 5498 6318	7818	7	33 112 6

CONFIDENTIAL DR_000038

Date 2000 AUG	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			
			From	To					ACROBATIC	GENERAL	HELICOPTER	
24	G-1159B	N908JE	SAF	VNY		1379	JE, KELLY SPAMM	✓	17			
26	"	"	VNY	TEB		1380	JE, GM, AP	✓	49			
31	"	"	TEB	PBI		1381	JE		22			
SEP 6	"	"	PBI	TEB		1382	JE	✓	25			
9	"	"	TEB	PBI		1383	JE, GM, ET, AP		23			
10	"	"	PBI	TIST		1384	JE, GM, ET, AP, CHERI KRAPE	✓	25			
12	"	"	TIST	TEB		1385	JE, GM, ET, AP, CHERI KRAPE	✓	39			
21	"	"	TEB	SAF		1386	JE, GM, AP, JOE PAGANO, 1 FEMALE		42			
25	"	"	SAF	VNY		1387	JE, KELLY SPAMM	✓	18			
26	"	"	VNY	TEB		1388	JE, TIFFANY GRAMZA	✓	48			
29	"	"	TEB	TIST		1389	JE, PETER MARINO, 1 PERSON	✓	36			
30	"	"	TIST	PBI		1390	JE, PETER MARINO, 1 FEMALE	✓	26			
OCT 2	"	"	PBI	TEB		1391	JE, GM, ET, 1 FEMALE	✓	25			
5	"	"	TEB	PBI		1392	JE, SHAGLEY LEWIS		24			
10	"	"	PBI	TEB		1393	JE, GM, ET	✓	25			
13	"	"	TEB	LGA		1394	JE REPOSITION FOR PARIS		5			
13	"	"	LGA	LFPB		1395	JE, VOR HOLDING	✓	71			
15	"	"	LFPB	EGBB		1396	JE, SHAGLEY LEWIS	✓	13			
17	"	"	EGBB	BGR		1397	JE, SHAGLEY LEWIS	✓	64			
I certify that the statements made by me on this form are true.								Page Total	13/10	597		
Pilot's Signature <u>David Rodriquez</u>								Amount Forward	6318 6005	7875.9	33	112.1
								Total to Date	6331 6015	7935.6	33	112.1

CONFIDENTIAL DR_000039

Date 19-- 2000	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ADIRPLANE	GLIDER	HELICOPTER
OCT 17	G-1159B	N908JE	BGR	LGA		1388	JE, SHELLEY LEWIS	✓	1	3	
20	"	"	PBI	MIA		1400	JE, GM, ET, KELLY SPAMM GARY ROXBURGH			6	
21	"	"	MIA	TIST		1401	JE, GM, ET, KELLY SPAMM GARY ROXBURGH		2	3	
23	"	"	TIST	EWB		1402	JE, GM, ET GARY ROXBURGH	✓	3	9	
25	"	"	EWB	EGGW		1403	JE, GM, ET	✓	6	4	
28	"	"	EGGW	BGR		1404	JE, GM, ET NORTHERN LIGHTS		7	1	
29	"	"	BGR	PBI		1405	JE, GM, ET		3	0	
30	"	"	PBI	TEB		1406	JE, GM, ET	✓	2	7	
31	"	"	TEB	PBI		1407	JE, SHELLEY LEWIS		1	9	
NOV 5	"	"	PBI	TIST		1408	JE, SHELLEY LEWIS, JESSICA	✓	2	4	
7	"	"	TIST	TEB		1409	JE, SHELLEY LEWIS, JESSICA BAKER	✓	4	4	
9	"	"	TEB	PBI		1410	JE, ET	✓	2	4	
12	"	"	PBI	CMH		1411	JE,	✓	2	2	
12	"	"	CMH	PBI		1412	JE	✓	2	3	
15	"	"	PBI	SAF		1413	JE, GM, ET		4	2	
16	"	"	SAF	VNY		1414	JE, GM, ET	✓	1	9	
17	"	"	VNY	SAN		1415	GM, ET	✓		7	
17	"	"	SAN	PBI		1416	JE, GM, ET		4	0	
19	"	"	PBI	BED		1417	JE, GM, ET	✓	2	6	
I certify that the statements made by me on this form are true.								Page Total	119	563	
Amount Forward								6331 6015 6342	7935	6	331126

CONFIDENTIAL DR_000040

Date 10-2000 2000 JAN 13	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ADP/ONE	G-LIDER	HELICOPTER
19	G-1159B	N908JE	BED	TEB		1418	JE, SHELLEY LEWIS		1	1	
22	"	"	TEB	DCA		1419	JE, AP, SHELLEY LEWIS	1/1	1	0	
22	"	"	DCA	PBI		1420	JE, AP, SHELLEY LEWIS	1/1	2	2	
28	"	"	PBI	TIST		1421	JE, GM		2	4	
30	"	"	TIST	PBI		1422	JE, GM	1/1	2	7	
DEC 1	"	"	PBI	DFW		1423	JE, GM	1/1	2	7	
1	"	"	DFW	ABQ		1424	JE, GM, RICARDO LEGORRETTA	1/1	1	8	
2	"	"	ABQ	SAF		1425	REPOSITION	1/1	5		
2	"	"	SAF	TEB		1426	JE, GM		3	5	
5	"	"	TEB	LFPB		1427	JE, GM, ET, KELLY SPAMM	1	6	8	
6	"	"	LFPB	EGGW		1428	JE, GM, ET, KELLY SPAMM		1	0	
7	"	"	EGGW	EGYM		1429	JE, GM, KELLY SPAMM, TOM PRITZKER EGM/ALC (MARTIN AIR FORCE BASE)		5		
7	"	"	EGYM	EGSH		1430	REPOSITION (SANDRINGHAM, ENGLAND)		4		
9	"	"	EGSH	CYQX		1431	JE, GM, ET, KELLY SPAMM (FOLLOWING SHOWN ON RUNWAY)		5	0	
9	"	"	CYQX	PBI		1432	JE, GM, ET, KELLY SPAMM		4	7	
11	"	"	PBI	TEB		1433	JE, GM, ET, VIRGINIA	1/1	2	6	
14	"	"	TEB	TIST		1434	JE, GM, AP, VIRGINIA	1/1	3	5	
14	"	"	TIST	PBI		1435	REPOSITION FOR OPS 2 ATLAS		2	4	
2001 JAN 13	"	"	PBI	PBI		1436	TEAS CERTIFICATION	1/1	7		
I certify that the statements made by me on this form are true.								Page Total:	9/10	455	
Amount Forward:								6342 6024 6251	79919	33	112 6

CONFIDENTIAL DR_000041

Date # of 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					AIRPLANE	GLIDER	HELICOPTER
JAN 16	G-1159B	N908JE	PBI	LCQ		1437	JG, GM, ET	1/1	8		
16	"	"	LCQ	TEB		1438	JG, GM, ET	1/1	21		
17	"	"	TEB	PBI		1439	JG, SHELLEY LEWIS		24		
22	"	"	PBI	TEB		1440	JG, GM, ET, AP	1/1	25		
23	"	"	TEB	LFPB		1441	JG, SHELLEY LEWIS	1/1	67		
25	"	"	LFPB	CYQX		1442	JG, SHELLEY LEWIS	1/1	59		
25	"	"	CYQX	TEB		1443	JG, SHELLEY LEWIS		27		
26	"	"	TEB	PBI		1444	JG, GM, ET, VIRGINIA ROBERTS		24		
18	C172	N1446V	PBI LNA	PBI LNA			C172 VOUT PETE SORENSON	2/2	4		
18	"	"	LNA	LCQ			B727 CLOSING NS05LS	1/1	24		
19	"	"	LCQ	MCO			JANATHAN MAMP - INSTRUMENT COMBINATION CHECK - CARRY CAPTURE		20		
19	"	"	MCO	LNA					19		
22	G1159B	N908JE	PBI	TIST		1445	JG, GM, ET, VIRGINIA ROBERTS	1/1	24		
30	"	"	TIST	PBI		1446	JG, GM, ET, VIRGINIA ROBERTS	1/1	26		
FEB 3	C-421B	N908GM	SAF	DFW			JANATHAN MAMP - FAR 61.31(G) SOLO QUALIFICATION FL270	1/1	30		
17	B-727-200	SIMULATOR	MGM	MGM			STALLS, STEEP TURNS, ENGINE START, TURNS CLIMBS, DESCENTS, VI ENGINE FAILURE, VLOC APPROACH, RTCL, ENGINE PROBS, ONE & TWO ENGINE APPROACH, FLAP ASSEMBLY, MINIMUM APPROACH PUSH BACK, QUICK TOL, EMERGENCY CIRCLING APPROACH, MANUAL REVERSAL, IN PANNED STABILIZER, SINGLE ENGINE LANDING, 2 ENGINE GO AROUND, CLIMB, STEEP TURNS, HOLD		25		
18	"	"	"	"					30		
19	"	"	DFW	MGM					22		
20	"	"	MGM	MGM					35		
I certify that the statements made by me on this form are true.								Pago Total	10 9	524	
Pilot's Signature <u>David Redden</u>								Amount Forward	6351 6034	80374	33 112
								Total to Date	6361		

CONFIDENTIAL DR_000042

Date 19 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					Fixed Wing	Glider	Helicopter
21	B-727-200	SPR88EE	DFW	DFW			RUNWAY STABILIZER, MANUAL GEAR OPERATION, FUEL PUMPING, RTO BRAKING, BATTERY CHARGING, TURNS, STALLS, SINGLE ENGINE GO-AROUND, 1 & 2 ENGINE APPROACHES, RTO, START PAUSE, UNUSUAL BTZ CHECK RIDE		2	5	
22	"	SEMULBJOC	MGM	MGM					2	5	
23	"	"	"	"					2	4	
23	C-421B	N908GM	DFW	ADS			JONATHAN MAND - HIGH DENSITY APPROACH OPERATIONS, BTZ	1/1	6		
23	"	"	ADS	PNS			JONATHAN MAND - SID, ECING OPERATIONS, FUEL MANAGEMENT, PERFORMANCE CHARTS	1/1	3	2	
23	"	"	PNS	PBE			JONATHAN MAND - LOST COMMUNICATIONS PROCEDURE, W/GO IN & DISTANCE		3	1	
3	"	"	PBE	LCA			KRISTY ROGERS - CLIMBS, DESCENTS, STRAIGHT & LEVEL GLS, BTZ		1	9	
3	"	"	LCA	LAL			KRISTY ROGERS - TURNS, STRAIGHT & LEVEL		1	3	
3	"	"	LAL	PBE			KRISTY ROGERS - DESCENTS, FL		1	1	
5	G-1159B	N909JE	PBE	CJT	1464		JG, GM, GT, VERLENE ROBERTS - CLIMB RUBENUS GOIN ROBUSTIN		3	8	
6	"	"	CJT	LFPB	1465		JG, GM, GT, VR	1/1	5	3	
6	"	"	LFPB	LGGR	1466		JG, GM, GT, VR, ALBERTO & LINDA PENO, LEGAR, REARDO LGGR, GT, VR	1/1	2	5	
8	"	"	LGGR	GMTT	1467		JG, GM, GT, VR, ALBERTO & LINDA PENO, LEGAR	1/1	8		
9	"	"	GMTT	EGGW	1468		JG, GM, GT, VR	1/1	2	8	
11	"	"	EGGW	BGR	1469		JG, GM, GT, VR		6	6	
11	"	"	BGR	TEB	1470		JG, GM, GT, VR		1	2	
14	C-421B	N908GM	PBE	ELL			LARRY MORRISON - TAKEOFF, STC, CLIMB, DESCENTS, TURNS	1/1	6		
14	"	"	ELL	PBE			LARRY MORRISON - CLIMB, DESCENTS, TURNS, STC	1/1	8		
15	G-1159B	N909JE	TEB	ISR	1471		JG, GM, GT, ALBERTO WALLACE, JOHN KUCK KUCK	1/1	6		
I certify that the statements made by me on this form are true.											
Pilot's Signature <u>David Rodriguez</u>								Page Total	8/7	436	
								Amount Forward	636 6043	80898	331126
								Total to Date	6369 6050	81334	331126

CONFIDENTIAL DR_000043

Date 18	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...						
			From	To					PERPLANE	GLIDER	HELICOPTER				
2001 MAR 15	G-1159B	N909JC	ISP	LCQ		1472	JE, GM, AP, ALEXIS WILBERT, RGR AND KUCERKOVA	1/1	2	6					
15	"	"	LCQ	PBI		1473	JE, GM, AP, AW, BK	1/1		9					
16	"	"	PBI	ALA		1474	JE, GM, AP, AW, BK, CHRIS LYNDEN RGR	1/1		7					
16	"	"	MFA	TEST		1475	JE, GM, AP, AV, BK, CL, ED TITILE RGR	1/1	2	3					
19	"	"	TEST	LCQ		1476	JE, GM, AP, AW, BK, CL, ESTHLE RGR	1/1	3	8					
22	"	"	LCQ	PBI		1477	JE, GM, ES, JOC, PABANDICVA, CELINA, RGR JORDAN, JORDAN, MIA DUBOIS, NANNY, AW K. RAY RODGERS - SCL, TURNS	1/1	2	4					
23	"	"	OPF	FLL			KRESY RODGERS - SCL, TURNS	1/1		6					
23	"	"	FLL	PBI			JONATHAN MAND - US - PFI			4					
24	"	"	PBI	ISM			JONATHAN MAND - IFR CROSS COUNTRY STAR, CROSSING, ACROSS COUNTRY	1/1		6					
24	"	"	ISM	PBI			JONATHAN MAND - IFR CROSS COUNTRY ATC, MISCOMMUNICATIONS	1/1	1	0					
27	G-1159B	N909JC	PBI	TEB		1478	JE, GM, ES, NR, 2 GCM, BLS, BAW RGR KUCERKOVA	1/1	2	5					
29	"	"	TEB	SAF		1479	JE, GM, AP, UR, BK, MARCIN MFSKY HENRY TARECKY		4	1					
31	"	"	SAF	PBI		1480	JE, GM, AP, UR, NIPED BJORLEY, HENRY TARECKY, MARCIN MFSKY	1/1	3	3					
APR 1	"	"	PBI	LCQ		1481	JE, GM, AP	1/1	1	0					
1	"	"	LCQ	TEB		1482	JE, GM, AP		2	1					
3	"	"	TEB	GAI		1483	JE, HEATHER MANN, LYDIA	1/1		9					
3	"	"	GAI	TEB		1484	JE, HEATHER MANN, LYDIA			8					
4	"	"	TEB	BEP		1485	JE, RHONDA	1/1		8					
I certify that the statements made by me on this form are true.								Page Total	15/12	51	9				
Pilot's Signature: <i>David Rediger</i>								Amount Forward	8364 6050	8133	4	3	3	112	1
								Total to Date	6384 2002	8165	3	3	3	112	1

CONFIDENTIAL DR_000044

Date 19__ 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					AER PLAN	CLARK	HELICOPT
APR 4	G-1159B	N909JC	BEO	TGB		1486	JG			9	
5	"	"	TGB	PBI		1487	JG, GT, BK		2	3	
6	C-421B	N909GM	PBI	FLL			HARRY MORRISON TAKE OFF, CLIMBS TURNING, DESCENDS, LANDS	1/1		7	
6	"	"	FLL	PBI			HARRY MORRISON TAKE OFF, CLIMBS TURNING, DESCENDS, LANDS	1/1		6	
9	G-1159B	N909JC	PBI	ACY		1488	JG, GT, VR, BK, JOANN	1/1	2	4	
9	"	"	ACY	TGB		1489	JG, GT, VR, BK, JOANN			7	
11	"	"	TGB	TEST		1490	JG, GM, AP, BK, VR, JOANN	1/1	3	5	
16	"	"	TEST	PBI		1491	JG, GM, AP, VR, BK, Gwendolyn Beck	1/1	2	7	
17	"	"	PBI	TGB		1492	JG, GM, GT, AP, BK, GB, JOEL PROKHOROV, MICHAEL J KALU, TRENOLLE	1/1	2	5	
20	"	"	TGB	PBI		1493	JG, GM, GT, BK		2	3	
23	"	"	PBI	GRL		1494	JG, GM, GT, KYLE	1/1		8	
23	"	"	GRL	TGB		1495	JG, GM, GT, KYLE, HENRY JARGOFF, STAFF	1/1	2	2	
27	"	"	TGB	SAF		1496	JG, BK		3	9	
29	"	"	SAF	VNY		1497	JG, BK, KELLY BORDAN	1/1	1	7	
MAY 2	"	"	VNY	SAN		1498	JG	1/1		7	
2	"	"	SAN	LIT		1499	JG	1/1	3	0	
3	"	"	LIT	ADS		1500	JG	1/1		9	
3	"	"	ADS	SAT		1501	JG, VERGIN DA ROBERTS	1/1		9	
5	"	"	SAT	PBF		1502	JG, VR	1/1	2	4	

I certify that the statements made by me on this form are true.

Pilot's Signature

David Roden

Page Total	14/11	35	1			
Amount Forward	6384	6062	8165	3	3	112
Total to Date	6298	6298	8165	4	2	112

CONFIDENTIAL DR_000045

Date Mo/Yr	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					PLANE	GLIDER	HELICOPTER
7 MAY 2001	G-1159B	N909JE	PBE	CHB		1503	JG, GM, CT, INCA DOERRIG	1/1	2	0	
7	"	"	CHB	TEB		1504	JG, GM, CT, INCA DOERRIG		1	1	
10	C421B	N908GM	PBE	MCN			JONATHAN MAND - CROSS COUNTRY IER, LARRY MORRISON, PATSY, KRISTY	1/1	2	6	
16	"	"	MCN	27K			JONATHAN MAND - IER CROSS COUNTRY LARRY MORRISON, PATSY, KRISTY	1/1	2	1	
10	"	"	27K	OSU			JONATHAN MAND - IER XC LARRY MORRISON	1/1	1	2	
10	"	"	OSU	JUY			JONATHAN MAND - GPS ORIENTATION		1	2	
11	"	"	JUY	27K			NO PASSAGE CORRS	1/1	7		
12	"	"	27K	ISM			NO PASSAGE CORRS	1/1	7		
13	"	"	ISM	GNV			RYAN COOMER - CLEMSON, TUNING, DESCENDS, A, B, L	1/1	3	0	
13	"	"	GNV	PBE		1506	RYAN COOMER - RADIO COMMUNICATIONS, CABLE PASTY, KRISTY, ALYSSA	1/1	3	8	
14	G1159B	N908JE	TEST	TEB			JG, GM, CT, BK, VR 1 FEMALE	1/1	3	8	
20	C-421B	N908GM	PBE	ISM			PASTY, KRISTY, ALYSSA	1/1	1	1	
20	"	"	ISM	PBE			KRISTY - CUMULUS, MIP, PROPS, MISTURE PASTY, KRISTY, ALYSSA	1/1	1	1	
24	G1159B	N909JE	TEB	PBE		1507	JG, GM, CT, AP, FEMALE	1/1	2	6	
25	C-421B	N908GM	PBE	LAL			PASTY, KRISTY, ALYSSA	1/1	1	3	
26	"	"	LAL	MCN			PASTY, KRISTY, ALYSSA - COMMUNICATIONS LARRY MORRISON, CROSS COUNTRY, PASTY	1/1	1	8	
27	"	"	MCN	ISM			PASTY, KRISTY	1/1	1	8	
28	"	"	ISM	PBE			PASTY, KRISTY - GPS ORIENTATION PASTY, KRISTY, ALYSSA - CROSS COUNTRY	1/1	1	1	
28	G1159B	N909JE	PBE	TEB		1508	JG, GM, CT, AP, JOEL PASTY COMM, 1 FEMALE 2 FEMALE	1/1	2	5	
I certify that the statements made by me on this form are true.								Page Total	16	33	5
Pilot's Signature: David Rodgers								Amount Forward	6398 6073	8200	4 33 112 6
								Total to Date	6414		

CONFIDENTIAL DR_000046

Date 18	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					AIRPLANE	GLIDER	HELICOPTER
4-2	B727-31	N505LS	LCQ	PBI			REPOSITION	1/	1	0	
6-1	G-1159B	N909JC	TEB	PBI		1501	JG, GM, ET, AP, BANU KUCUK KAYLU	1/1	2	6	
3	"	"	PBI	TJST		1502	JG, VERBENA ROBERTS, BANU KUCUK KAYLU	1/	2	4	
5	"	"	TJST	TEB		1511	JG, VR, BK	1/1	3	8	
8	"	"	TEB	CYUL		1512	JG, GM, NAOMI CAMPBELL, REBECCA WHIST, ANNA, LAVALLEE, JAMMA, MOLETO, DAVID	1/1	1	1	
12	"	"	CYUL	TEB		1513	REPOSITION (AP, BLUDD, DOLLY)	1/1	1	1	
12	"	"	TEB	PBI		1514	JG	1/1	2	3	
13	"	"	PBI	TEB		1515	JG, CAROL	1/1	2	4	
15	"	"	TEB	PBI		1516	JG, GM, SHARON, CAROLYN, 1 FEMALE		2	3	
18	"	"	PBI	TEB		1517	JG, GM, 1 FEMALE	1/1	2	5	
22	"	"	TEB	LFPD		1518	JG, GM, CRYSTAL, WASCH, GREGORY, GRINCAVA	1/1	7	0	
23	"	"	LFPD	LFMN		1519	JG, GM, 1 FEMALE	1/1	1	2	
25	"	"	LFMN	LIML		1520	JG, GM, 1 FEMALE	1/1		7	
26	"	"	LFML	LFPB		1521	JG, GM	1/1	1	4	
28	"	"	LFPB	LPAZ		1522	JG, GM, ET, ED TUTTLE	1/1	3	9	
28	"	"	LPAZ	TJST		1523	JG, GM, ET, ED TUTTLE		6	0	
24	"	"	TJST	PBI		1524	JG, AP, VR, 1 FEMALE	1/1	2	5	
8	"	"	PBI	TEB		1525	JG, GM, ET, AP, VR, SHARON, CAROLYN, 1 FEMALE	1/1	2	7	
11	"	"	TEB	CPS		1526	JG, GM, ET, VR		2	3	
I certify that the statements made by me on this form are true.								Page Total	16/14	49	2
Pilot's Signature <i>Devin Rodgers</i>								Amount Forward	6414	8233	9 3 3 112 6
								Total to Date	6430	8283	1 3 3 112 6

CONFIDENTIAL DR_000047

Date 18 2000	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					AIRPLANE	GLIDER	HELICOPTER
JUL 16	G-1159B	N909JC	CPS	SAF	1521	1521	REPRESENTATIVE PILOT 5 STATIC LG-AX GEORGE ROBERTS GARY ROBERTS	1/1	2	2	
16	"	"	SAF	TEB	1528	1528	JC, ET, GM, VR	1/1	3	5	
23	"	"	PBE	TEB	1530	1530	JC, STEVEY LEWIS	1/1	2	5	
28	"	"	TEB	PBE	1531	1531	JC, VIRGINIA ROBERTS	1/1	2	6	
29	"	"	PBE	ISP	1532	1532	JC	1/1	2	5	
29	"	"	ISP	TEB	1533	1533	JC	1/1	7		
AVE 1	"	"	TEB	PBE	1534	1534	JC, GM, ET, 1 FEMALE MEXICAN MONITOR IN FLIGHT SCOUT	1/1	2	4	
3	B-727-31	N908JC	JAX	PBE			NIGHT CURRENTLY	4/4	1	4	
4	B-727-100	PANAMA SIMULATOR	MDP	MFA					1	0	
5	G-1159B	N909JC	PBE	TEB	1535	1535	JC, GM, ET, CT, TAYLOR	1/1	2	6	
5	"	"	TEB	PBE	1536	1536	NO PASSENGERS		2	3	
7	B-727-31	N908JC	PBE	LGA			MEXICAN MONITOR	1/1	2	6	
7	"	"	LGA	ABQ	2	2	JC, GM, ET, PP, 2 FEMALE	1/1	4	0	
14	C-421B	N908GM	PBE	JAN			JONATHAN MAND - INSTRUCTOR COMPETENCY CHECK SATISFACTORY	1/1	3	9	
14	"	"	JAN	AMA			JONATHAN MAND - LPA WITH GS XS KNOT XWIND LANDING	1/1	3	6	
14	"	"	AAA	QEQ			JONATHAN MAND -	1/1	1	7	
15	"	"	QEQ	ABQ			JONATHAN MAND - HIGH DENSITY FLIGHT OPERATIONS	1/1	5		
15	"	"	ABQ	ZURRO			JONATHAN MAND - SHORT FIELD LPA OPERATIONS	1/1	7		
16	B-727-31	N908JC	ABQ	PBE	6	6	JC, GM, ET, PP, FLEW, JONATHAN MAND	1/1	3	8	
I certify that the statements made by me on this form are true.								Page Total	20/17	44	5
Pilot's Signature								Amount Forward	6430 6452 6450	8283	1 3 3 112 6

CONFIDENTIAL DR_000048

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					AIRPLAN	GLIDE	HOIST
2008											
AUG 19	B-727-31	N908JC	PBI	HPN		7	JE, GM, ET, SP FLARE RETURN, GEL SURF, ROLLOVER	1/1	2	5	
24	"	"	HPN	PBI		8	JE, GM, BAWUKBOKKORU	1/1	2	4	
27	"	"	PBI	HPN		9	JE, GM, BK	1/1	2	6	
29	"	"	HPN	TIST		10	JE, GM, ET, AP, BK	1/1	3	7	
30	G-1159B	N908JC	PBI	PBI			3 FLTS AT 10000 FT, LADY SAGE, 10000 FT, LADY SAGE	3/3	3	6	
SEP 3	B-727-31	N908JC	TIST	HPN		11	JE, GM, ET, AP, BK, SARAH KELLER, ALEXANDER PERKIN, 1 FEMALE	1/1	3	7	
6	"	"	HPN	PBI		12	JE, GM, ET, BK, 1 FEMALE		2	4	
9	"	"	PBI	HPN		13	JE, GM, ET, BK	1/1	2	7	
15	"	"	HPN	PBI		14	JE, GM, ET, KARGU CASEY, LISA	1/1	2	6	
19	C-172	N1446V	LNA	LNA			AL PERKINS - TAXI, TAXI, TAXI, TURN, CLIMB, DESCEND	4/4	4	9	
19	B-727-31	N908JC	PBI	HPN		15	JE, GM, ET	1/1	2	7	
21	"	"	HPN	CYRX		16	JE, GM, ET		2	2	
22	"	"	CYRX	LFPB		17	JE, GM, ET	1	4	9	
25	"	"	LFPB	CYRX		18	JE, ET, ED TUTTLE		3	5	
25	"	"	CYRX	HPN		19	JE, ET, ED TUTTLE		3	0	
28	"	"	HPN	PBI		20	JE, ET, PAULA EPSTEIN		2	7	
OCT 5	"	"	PBI	ABQ		21	JE, GM, SARAH KELLER	1/1	4	0	
5	"	"	ABQ	HPN		22	JE, GM, SK, 2 FEMALE	1/1	3	7	
8	"	"	HPN	JAX		23	NO PASSENGERS		2	2	
I certify that the statements made by me on this form are true.											
Pilot's Signature <u>David Rodger</u>											
Page Total								17/14	55	0	
Amount Forward								6450	8327	6	33112
Total to Date								6467	8387	12	32112

CONFIDENTIAL DR_000049

Date 19 2008	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					AIRCRAFT	GLIDER	HELICOPTER
OCT 15	C172R	N395SP	LNA	LNA				3/3	5		
15	"	N395SP	LNA-BET-LNA				LARRY MORRISON - BFR SATISFACTORY STATUS, MCA, STRESS TURNS, EMERGENCY LANDING	4/4	13		
9	B-721-31	N908JE	JAX	LCQ	24		NO PASSENGERS	1/1	5		
10	G-1159B	N909JE	PBI	TEB	1533		NO PASSENGERS	0/0	25		
11	"	"	TEB	PBI	1534		JE SARAH KELLEN		23		
15	"	"	PBI	TEB	1540		JE, GM, SK, LARRY, STEVE, 1 FEMALE	1/1	24		
17	"	"	TEB	BED	1541		JE, BONNIE	1/1	8		
17	"	"	BED	TEB	1542		JE, BONNIE		10		
18	"	"	TEB	TEST	1543		JE, GM, AP, SK, 2 FEMALES		35		
23	"	"	TEST	TEB	1544		JE, GM, AP, SK, SHERIDAN GLOSON, ALEXANDER WILSON	1/1	40		
26	"	"	TEB	PBI	1545		JE, ET, SK, SHERIDAN GLOSON, 2 FEMALES MONICA GLOSON & SHERIDAN		26		
30	"	"	PBI	LCQ	1546		JE, SARAH KELLEN, JULIE	1/1	10		
30	"	"	LCQ	TEB	1547		JE, SK, JULIE	1/1	20		
NOV 3	"	"	TEB	SAF	1548		JE, GM, SK	1/1	40		
5	"	"	SAF	ASC	1549		JE, GM, SK	1/1	8		
5	"	"	ASC	PBI	1550		JE, GM, SK	1/1	37		
6	"	"	PBI	CMH	1551		JE, SK BELLA WYNNE'S FUNERAL	1/1	24		
6	"	"	CMH	TEB	1552		JE, SK		14		
9	"	"	TEB	LCQ	1553		JE, AP, SK, JULIE	1/1	22		
I certify that the statements made by me on this form are true.								Page Total	18	389	
Pilot's Signature David Redman								Amount Forward	6467	8382	6
								Total to Date	6485	8471	11

CONFIDENTIAL DR_000050

CONFIDENTIAL DR_000051

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ALP/ALP	HELICOPTER
9	G-1159B	N908JE	LCQ	PBI		1501	IC, AB, SK, JULIE	1/1	1	0
12	"	"	PBI	TEB		1555	IC, GM, AP, JOEL PASADENA, JULIE	1/1	2	5
15	"	"	TEB	PBI		1558	IC, GM, SK, AB, JULIE, MCA, INDIANAPOLIS	1/1	2	5
17	B-727-31	N908JE	LCQ	PBI		25	IC, GM, SK, AB, JULIE, MCA, INDIANAPOLIS	1/1	0	9
18	"	"	PBI	CYQX		26	IC, GM, SK	1/1	4	3
18	"	"	CYQX	LFPB		27	IC, GM, SK	1/1	4	9
23	"	"	LFPB	LIML		28	IC, GM, SK	1/1	1	2
23	"	"	LIML	LPR		29	IC, GM, SK, EDWARD	1/1	8	
23	"	"	LPR	LIML		30	IC, GM, SK, EDWARD	1/1	9	
24	"	"	LIML	EGGW		31	IC, GM, SK	1/1	1	7
26	"	"	EGGW	HPN		32	IC, GM, SK	1/1	7	9
30	"	"	HPN	PBI		33	IC, SK, GM, INDIANAPOLIS, JOEL PASADENA, KAREN CASSET	1/1	2	5
DEC 4	"	"	PBI	ISB		34	IC, SK	1/1	2	5
8	"	"	ISB	PBI		35	IC, AP	1/1	2	7
9	"	"	PBI	TEST		36	IC, GM, AP, 1 FEMALE	1/1	2	7
13	"	"	TEST	HPN		37	IC, GM, SK, AP, JOEL PASADENA, KAREN CASSET, EDWARD	1/1	4	0
15	"	"	HPN	CMB		38	IC, STEWART, EDWARD, 2 FEMALE, 1 MALE	1/1	1	5
16	"	"	CMB	PBI		39	IC	1/1	2	1
I certify that the statements made by me on this form are true.								Page Total Amount Forward Total to Date		
Pilot's Signature: <i>David Robinson</i>								7/6	226	
								6488	84215	33
								6492	84501	33
								6155	112	6
								6155	112	6

CONFIDENTIAL DR_000052

Date 2007 NOV	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category	
			From	To					ABX-ONE	HE-L-ONE
4	C-42B	N908GM	ZORRO	SAF			10000000, 2 MEN (CANDIDATE PARENTS)	1/1		5
4	"	"	SAF	ZORRO			10000000, 2 MEN (CANDIDATE PARENTS)	1/1		5
4	"	"	ZORRO	ZORRO			10000000, 2 MEN (CANDIDATE PARENTS)	1/1		5
30 DEC	B-727-31	N908JC	HPN	PBI		37	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		25
4	"	"	PBI	ISP		34	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		25
4	"	"	ISP	PBI		35	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		25
9	"	"	PBI	TEST		36	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		27
13	"	"	TEST	HPN		37	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
15	"	"	HPN	CMH		38	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		40
16	"	"	CMH	PBI		39	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		15
17	"	"	PBI	TEST		40	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		21
26	"	"	TEST	TLPL		41	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		26
26	"	"	TLPL	PBI		42	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		11
30 2007 JAN 6	"	"	PBI	TEST		43	10000000, 2 MEN (CANDIDATE PARENTS)	0/0		36
11	"	"	TEST	CMH		44	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		24
13	G-1159B	N909JC	PBI	MBPV		45	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		41
13	"	"	MBPV	PBI		46	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		26
14	B-727-31	N908JC	PBI	LGA		47	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		15
						48	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		17
						49	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						50	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
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						52	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						53	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						54	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						55	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						56	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
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						58	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
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						60	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
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						62	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						63	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						64	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						65	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						66	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						67	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						68	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
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						73	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
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						82	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						83	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						84	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						85	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						86	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						87	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						88	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
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						91	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						92	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						93	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						94	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						95	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						96	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						97	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						98	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						99	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22
						100	10000000, 2 MEN (CANDIDATE PARENTS)	1/1		22

I certify that the statements made by me on this form are true.

Pilot's Signature: David Redfern

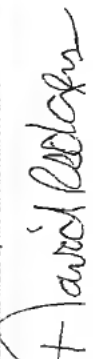
Page Total: 137
Amount Forward: 84501
Total to Date: 84501

CONFIDENTIAL DR_000053

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					PER PLATE	HELICOPTER
15 JAN 15	B-727-31	N9409JE	LGA	BED		47	JE	1/1	7	
15	"	"	BED	HPN		48	JE, JE-SSIA		8	
17	"	"	HPN	TEST		49	JE, GM, SK, AP, CENOV LOREZ, JE-SSIA		3	4
20	"	"	TEST	PBI		50	JE, GM, SK, AP, CENOV LOREZ, JE-SSIA	1/1	2	6
22	"	"	PBI	HPN		51	JE, GM, SK, AP, CENOV LOREZ	1/1	2	5
25	"	"	HPN	PBI		52	JE, GM, SK, AP, CENOV LOREZ, JE-SSIA		2	7
27	"	"	PBI	TEST		53	JE, GM, SK, AP, CENOV LOREZ, JE-SSIA	1/1	2	4
30	"	"	TEST	JFK		54	JE, GM, SK, AP, CENOV LOREZ	1/1	3	7
31	"	"	JFK	PBI		55	JE, GM, SK, AP, CENOV LOREZ	1/1	2	8
9	"	"	PBI	MIA		56	JE, SK, AP			
9	"	"	MIA	HPN		57	JE, GM, SK, AP, CENOV LOREZ, JE-SSIA		2	6
10	"	"	HPN	LFBB		58	JE, GM, SK, AP, CENOV LOREZ, JE-SSIA	1/1	6	5
13	"	"	LFBB	ESSA		59	JE, SK	1/1	2	2
14	"	"	ESSA	LFML		60	JE, SK	1/1	2	4
15	"	"	LFML	EGGW		61	JE, SK		1	8
15	"	"	EGGW	BGR		62	JE, GM, SK		7	2
16	"	"	BGR	PBI		63	JE, GM, SK		3	8
18	G-11590	N909JE	PBI	ABY		158	JE	1/1	1	4
18	"	"	ABY	PBI		159	EMPTY	1/1	1	1
Page Total								10	51	0
Amount Forward								6507	8490	9
Total to Date								6517	8541	9
								6517	33	112
								6517	33	112

I certify that the signatures made by me on this form are true.

Pilot's Signature



Pilot's Signature: Daniel Pridmore

CONFIDENTIAL DR_000055

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ARRIVAL	DEPART
2018-07-27-31	N908JE		PBI	TIST		78	JE, GMSK, AP, 2 REMAINS	1/1	23	HELICOPT
5	"	"	TIST	PBI		79	SCANNING FOR LA	1/1	27	
5	"	"	PBI	IAD		80	SCANNING FOR LA		21	
6	"	"	IAD	PBI		81	SCANNING FOR LA	1/1	23	
8	"	"	PBI	JKF		82	JE, SK, SHELLEY LEWIS	1/1	25	
2018-07-27-200	SIMULATOR		MFA	MFA			PRECEDENT, TR LOSS, CSO LOW OIL PRESSURE AND DECOMPRESSION, AIRCRAFT NOT TESTED		20	
22	"	"	"	"			NO AP, START, LOSS OF ALL GENERATORS		20	
23	"	"	"	"			SHOULD BE IN FLIGHT, MAINTAINING CONTROL, STAY AT ENGINE, ENGINE, ENGINE, ENGINE		20	
24	"	"	"	"			EMERGENCY, FUEL, OIL, SYSTEM, FUEL, LOSS, ELECTRICAL, SYSTEM, FUEL, SYSTEM, FUEL, SYSTEM		20	
25	"	"	"	"			TR, LOSS, LOSS OF ALL GENERATORS, LOSS OF ALL GENERATORS, ENGINE, ENGINE		20	
26	"	"	"	"			TR, LOSS, LOSS OF ALL GENERATORS, ENGINE, ENGINE		20	
27	"	"	"	"			TR, LOSS, LOSS OF ALL GENERATORS, ENGINE, ENGINE		20	
29	B-727-31	N908JE	PBI	ABQ		90	JE, GMSK		41	
30	"	"	ABQ	JKF		91	JE, GMSK	1/1	32	
4	"	"	JKF	PBI		92	JE, SHELLEY LEWIS	1/1	24	
TOTALS REPORTED										
Page Total								85	366	
Amount Forward								6528	85485	33 112 6
Total to Date								6533	86351	33 112 6

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodriguez

G. J. C. C.

CONFIDENTIAL DR_000057

Date + Time	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Agas P/B/W	Size Wgt
2002 JUN 8	B-727-314	N908JE	EIDW	JFK		111	JE, GMSK	1/1	69	16-15-00
8	"	"	JFK	PBI		112	JE, SK	1/1	23	
12	G-1159B	N904JE	PBI	PBI		113	GMU FLIGHTS-SEAR RELEY, GNEC UNIFORM	1/1	27	
14	B-727-314	N908JE	PBI	BOS		114	REPOSITION		26	
14	"	"	BOS	TIST		115	JE, SK, GNDY LOPEZ, LAUREN HENES		37	
16	"	"	TIST	JFK		116	JE, GMSK, GNDY LOPEZ, LAUREN HENES	1/1	30	
19	G-1159B	N904JE	PBI	TGB		117	REPOSITION		32	
19	"	"	TGB	PBI		118	JE, GMSK, GNDY LOPEZ, LAUREN HENES	1/1	25	
21	"	"	PBI	MYEF		119	JE, GMSK, GNDY LOPEZ, LAUREN HENES	1/1	1	
21	"	"	MYEF	PBI		120	REPOSITION	0/0	12	
23	"	"	PBI	MYEF		121	REPOSITION	0/0	1	
23	"	"	MYEF	TGB		122	JE, GMSK, GNDY LOPEZ, LAUREN HENES	1/1	29	
23	"	"	TGB	PBI		123	REPOSITION		25	
27	B-727-314	N908JE	JFK	LFPB		124	JE, GMSK, GNDY LOPEZ, LAUREN HENES	1/1	71	
29	"	"	LFPB	LFTH		125	JE, GMSK, GNDY LOPEZ, LAUREN HENES	1/1	13	
30	"	"	LFTH	LFPB		126	JE, GMSK, GNDY LOPEZ, LAUREN HENES	1/1	15	
13	"	"	LFPB	LFTH		127	JE, GMSK, GNDY LOPEZ, LAUREN HENES	0/0	12	
I certify that the statements made by me on this form are true.									Page Total	
									Amount Forward	
									6534	33
									6187	112
									6547	6

Signature

(Signature)

Date Flight No.	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ASR/ALP/CL/LEADER	TELECOM
2002 5/13	B-727-314	N908JG	LFMN	GMTT		120	JE, GM, SK, AP, CINDY LOPEZ		2	1
13	"	"	GMMT	GMMC		121	JE, GM, SK, CL, AP		7	
13	"	"	GMMT	LPAT		122	JE, GM, SK, AP, CL, & SECURITY SERVICE DOUG BROWN, MIKE, & SECURITY SERVICE		2	4
13	"	"	LPAT	JFK		123	JE, GM, SK, AP, CL, & SECURITY SERVICE DOUG BROWN, MIKE, & SECURITY SERVICE		5	8
18	"	"	JFK	PBI		124	JE, SHELLEY LEWIS, 2 FEMALES		2	2
19	"	"	PBI	JAX		125	KRISTY RODGERS, GREG HODGART, ALESSA HALL, DERS-C CHECK		1	0
20	G-1159B	N908JG	PBI	MVY		126	JE, 1 FEMALE		2	0
4	"	"	MVY	BED		127	JE, 1 FEMALE		7	
4	"	"	BED	TGB		128	JE, 1 FEMALE		9	
5	"	"	TGB	SAF		129	JE, SK, 2 FEMALES	1/1	3	9
6	C-172XP	N739SP	ACG	ACG		130	172 CHECK OUT	3/3	9	
6	206L3	N474AW	ZORRO	AGG		131	C-CHECK FLIGHT TEST	1/1	9	
15	B-727-314	N908JG	JAX	JAX		132	RETURN FROM C-CHECK			
16	"	"	JAX	PBI		133	JE, GM, SK, CINDY LOPEZ, VERLINDA ROBERTS, RICHARD CONRAD, BILLY, MARGARET, NICK STANLEY		1	1
17	G-1159-B	N908JG	SAF	TGB		134	JE, VERLINDA ROBERTS, 1 FEMALE		3	7
18	"	"	TGB	PBI		135	JE, VERLINDA ROBERTS, 1 FEMALE		2	4
21	B-727-314	N908JG	PBI	TEST		136	JE, SHELLEY LEWIS		2	5
25	"	"	TEST	JFK		137	JE, SK	1/1	3	6
28	"	"	JFK	LFPB		138	JE, SK, CINDY LOPEZ, 1 FEMALE		6	4
Page Total									6	40
Amount Forward									8140	1
									33	112

I certify that the statements made by me on this form are true.



 11 Nov 2002

CONFIDENTIAL DR_000058

David Erdos

CONFIDENTIAL DR_000060

Date 19- 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRPORT	HELIP
29 OCT	B-727-200	N909JC	LFPB	EGGW		146	1st AS ABOVE LESS JS SK	1/1		9
1	"	"	EGGW	LFPB		147	2nd AS ABOVE LESS JS SK			10
2	"	"	LFPB	JFK		148	3rd AS ABOVE LESS JS SK			81
3	"	"	JFK	PBI		149	4th AS ABOVE LESS JS SK			24
6	G-1159B	N909JC	PBI	TGB		150	5th AS ABOVE LESS JS SK			23
11	"	"	TGB	PBI		151	6th AS ABOVE LESS JS SK			25
14	"	"	PBI	EGGW		152	7th AS ABOVE LESS JS SK	1/1		8
15	"	"	EGGW	TGB		153	8th AS ABOVE LESS JS SK	1/1		24
17	"	"	TGB	TEST		154	9th AS ABOVE LESS JS SK			37
21	"	"	TEST	PBI		155	10th AS ABOVE LESS JS SK	1/1		26
30	"	SEMULORE	JFK	MDV		156	11th AS ABOVE LESS JS SK			20
31	"	"	MDV	JFK		157	12th AS ABOVE LESS JS SK			20
31 NOV	"	"	SWF	JFK		158	13th AS ABOVE LESS JS SK	3/3		20
3	"	N909JC	PBI	TEST		159	14th AS ABOVE LESS JS SK	1/1		23
6	B-727-200	SEMULORE	MDV	MDV		160	15th AS ABOVE LESS JS SK			20
6	"	"	MDV	MDV		161	16th AS ABOVE LESS JS SK			20
10	G-1159B	N909JC	TEST	TGB		162	17th AS ABOVE LESS JS SK			43
15	"	"	TGB	TEST		163	18th AS ABOVE LESS JS SK			26
15	"	"	TEST	PBI		164	19th AS ABOVE LESS JS SK	4/8		26
I certify that the statements made by me on this form are true.									Page Total	4815
									Amount Forward	88466
									33113	

G. J. Anderson

CONFIDENTIAL DR_000061

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					951296	11-114
Nov 18	B-727-311H	NH 1533C	PBI	TST		150	RECEIVED	1/1	2	4
18	"	"	TST	LPB		151	RECEIVED	1/1	5	6
19	"	"	LPB	LPB		152	RECEIVED	1/1	4	1
22	"	"	LPB	LPB		153	RECEIVED		1	3
22	"	"	LPB	LPB		154	RECEIVED		2	5
24	"	"	LPB	LPB		155	RECEIVED	1/1	1	4
24	"	"	LPB	LPB		156	RECEIVED		3	6
24	"	"	LPB	LPB		157	RECEIVED		2	7
26	"	"	LPB	LPB		158	RECEIVED		2	5
Dec 1	"	"	LPB	LPB		159	RECEIVED		2	3
5	"	"	LPB	LPB		160	RECEIVED		2	4
9	"	"	LPB	LPB		161	RECEIVED	1/1	2	5
15	"	"	LPB	LPB		162	RECEIVED	1/1	1	2
21	G-115710	NH 1533C	ABT	ABT		163	RECEIVED	1/1	1	1
21	"	"	ABT	ABT		164	RECEIVED	1/1	2	3
23	"	"	ABT	ABT		165	RECEIVED	1/1	2	8
23	"	"	ABT	ABT		166	RECEIVED		2	4
23	"	"	ABT	ABT		167	RECEIVED		2	4
23	"	"	ABT	ABT		168	RECEIVED	7/6	5	3
23	"	"	ABT	ABT		169	RECEIVED	6567	8896	1
23	"	"	ABT	ABT		170	RECEIVED	6214	8896	1
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23	"	"	ABT	ABT		172	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		173	RECEIVED	6574	8896	1
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23	"	"	ABT	ABT		237	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		238	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		239	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		240	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		241	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		242	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		243	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		244	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		245	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		246	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		247	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		248	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		249	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		250	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		251	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		252	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		253	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		254	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		255	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		256	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		257	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		258	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		259	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		260	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		261	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		262	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		263	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		264	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		265	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		266	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		267	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		268	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		269	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		270	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		271	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		272	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		273	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		274	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		275	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		276	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		277	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		278	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		279	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		280	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		281	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		282	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		283	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		284	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		285	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		286	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		287	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		288	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		289	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		290	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		291	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		292	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		293	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		294	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		295	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		296	RECEIVED	6574	8896	1
23	"	"	ABT	ABT		297	RECEIVED	6574	8896	1
23	"	"	ABT	ABT						

0-1000

CONFIDENTIAL DR 000063

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...
			From	To				
10-2-03	B-727-31H	N908JC	MRY	ABQ	184	TC-100, SK, JET, LUC BRUNEL, BENT	1	10
11-4-03	"	"	ABQ	JFK	185	TC-100, SK, JET, LUC BRUNEL, BENT	3	5
11-5-03	"	"	JFK	PBI	186	TC-100, SK, JET, LUC BRUNEL, BENT	2	8
12-12-03	B-727-200	N908JC	MIA	LCL	187	TC-100, SK, JET, LUC BRUNEL, BENT	2	5
12-11-03	"	"	"	"	188	TC-100, SK, JET, LUC BRUNEL, BENT	2	5
13-11-03	"	"	"	"	189	TC-100, SK, JET, LUC BRUNEL, BENT	2	5
13-11-03	"	"	"	"	190	TC-100, SK, JET, LUC BRUNEL, BENT	2	5
17-11-03	G-159B	N408JC	PBI	TEB	191	TC-100, SK, JET, LUC BRUNEL, BENT	2	4
18-11-03	"	"	TEB	OCB	192	TC-100, SK, JET, LUC BRUNEL, BENT	1	0
19-11-03	"	"	OCB	TEB	193	TC-100, SK, JET, LUC BRUNEL, BENT	1	1
20-11-03	"	"	TEB	PBI	194	TC-100, SK, JET, LUC BRUNEL, BENT	2	8
21-11-03	"	"	PBI	MYNN	195	TC-100, SK, JET, LUC BRUNEL, BENT	1	0
23-11-03	"	"	MYNN	PBI	196	TC-100, SK, JET, LUC BRUNEL, BENT	8	
25-11-03	B-727-31H	N908JC	PBI	JFK	197	TC-100, SK, JET, LUC BRUNEL, BENT	2	5
27-11-03	"	"	JFK	TEB	198	TC-100, SK, JET, LUC BRUNEL, BENT	3	3
28-11-03	"	"	TEB	SBGR	199	TC-100, SK, JET, LUC BRUNEL, BENT	6	4
5-12-03	"	"	SBGR	GVAC	200	TC-100, SK, JET, LUC BRUNEL, BENT	6	2
6-12-03	"	"	GVAC	LFPB	201	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
10-12-03	"	"	LFPB	CYOK	202	TC-100, SK, JET, LUC BRUNEL, BENT	5	4
11-12-03	"	"	"	"	203	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
12-12-03	"	"	"	"	204	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
13-12-03	"	"	"	"	205	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
14-12-03	"	"	"	"	206	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
15-12-03	"	"	"	"	207	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
16-12-03	"	"	"	"	208	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
17-12-03	"	"	"	"	209	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
18-12-03	"	"	"	"	210	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
19-12-03	"	"	"	"	211	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
20-12-03	"	"	"	"	212	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
21-12-03	"	"	"	"	213	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
22-12-03	"	"	"	"	214	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
23-12-03	"	"	"	"	215	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
24-12-03	"	"	"	"	216	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
25-12-03	"	"	"	"	217	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
26-12-03	"	"	"	"	218	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
27-12-03	"	"	"	"	219	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
28-12-03	"	"	"	"	220	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
29-12-03	"	"	"	"	221	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
30-12-03	"	"	"	"	222	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
31-12-03	"	"	"	"	223	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
1-1-04	"	"	"	"	224	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
2-1-04	"	"	"	"	225	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
3-1-04	"	"	"	"	226	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
4-1-04	"	"	"	"	227	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
5-1-04	"	"	"	"	228	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
6-1-04	"	"	"	"	229	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
7-1-04	"	"	"	"	230	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
8-1-04	"	"	"	"	231	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
9-1-04	"	"	"	"	232	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
10-1-04	"	"	"	"	233	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
11-1-04	"	"	"	"	234	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
12-1-04	"	"	"	"	235	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
13-1-04	"	"	"	"	236	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
14-1-04	"	"	"	"	237	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
15-1-04	"	"	"	"	238	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
16-1-04	"	"	"	"	239	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
17-1-04	"	"	"	"	240	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
18-1-04	"	"	"	"	241	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
19-1-04	"	"	"	"	242	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
20-1-04	"	"	"	"	243	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
21-1-04	"	"	"	"	244	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
22-1-04	"	"	"	"	245	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
23-1-04	"	"	"	"	246	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
24-1-04	"	"	"	"	247	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
25-1-04	"	"	"	"	248	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
26-1-04	"	"	"	"	249	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
27-1-04	"	"	"	"	250	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
28-1-04	"	"	"	"	251	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
29-1-04	"	"	"	"	252	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
30-1-04	"	"	"	"	253	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
31-1-04	"	"	"	"	254	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
1-2-04	"	"	"	"	255	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
2-2-04	"	"	"	"	256	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
3-2-04	"	"	"	"	257	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
4-2-04	"	"	"	"	258	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
5-2-04	"	"	"	"	259	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
6-2-04	"	"	"	"	260	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
7-2-04	"	"	"	"	261	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
8-2-04	"	"	"	"	262	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
9-2-04	"	"	"	"	263	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
10-2-04	"	"	"	"	264	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
11-2-04	"	"	"	"	265	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
12-2-04	"	"	"	"	266	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
13-2-04	"	"	"	"	267	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
14-2-04	"	"	"	"	268	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
15-2-04	"	"	"	"	269	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
16-2-04	"	"	"	"	270	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
17-2-04	"	"	"	"	271	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
18-2-04	"	"	"	"	272	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
19-2-04	"	"	"	"	273	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
20-2-04	"	"	"	"	274	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
21-2-04	"	"	"	"	275	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
22-2-04	"	"	"	"	276	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
23-2-04	"	"	"	"	277	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
24-2-04	"	"	"	"	278	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
25-2-04	"	"	"	"	279	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
26-2-04	"	"	"	"	280	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
27-2-04	"	"	"	"	281	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
28-2-04	"	"	"	"	282	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
29-2-04	"	"	"	"	283	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
30-2-04	"	"	"	"	284	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
31-2-04	"	"	"	"	285	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
1-3-04	"	"	"	"	286	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
2-3-04	"	"	"	"	287	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
3-3-04	"	"	"	"	288	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
4-3-04	"	"	"	"	289	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
5-3-04	"	"	"	"	290	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
6-3-04	"	"	"	"	291	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
7-3-04	"	"	"	"	292	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
8-3-04	"	"	"	"	293	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
9-3-04	"	"	"	"	294	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
10-3-04	"	"	"	"	295	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
11-3-04	"	"	"	"	296	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
12-3-04	"	"	"	"	297	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
13-3-04	"	"	"	"	298	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
14-3-04	"	"	"	"	299	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
15-3-04	"	"	"	"	300	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
16-3-04	"	"	"	"	301	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
17-3-04	"	"	"	"	302	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
18-3-04	"	"	"	"	303	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
19-3-04	"	"	"	"	304	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
20-3-04	"	"	"	"	305	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
21-3-04	"	"	"	"	306	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
22-3-04	"	"	"	"	307	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
23-3-04	"	"	"	"	308	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
24-3-04	"	"	"	"	309	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
25-3-04	"	"	"	"	310	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
26-3-04	"	"	"	"	311	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
27-3-04	"	"	"	"	312	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
28-3-04	"	"	"	"	313	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
29-3-04	"	"	"	"	314	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
30-3-04	"	"	"	"	315	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
31-3-04	"	"	"	"	316	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
1-4-04	"	"	"	"	317	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
2-4-04	"	"	"	"	318	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
3-4-04	"	"	"	"	319	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
4-4-04	"	"	"	"	320	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
5-4-04	"	"	"	"	321	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
6-4-04	"	"	"	"	322	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
7-4-04	"	"	"	"	323	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
8-4-04	"	"	"	"	324	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
9-4-04	"	"	"	"	325	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
10-4-04	"	"	"	"	326	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
11-4-04	"	"	"	"	327	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
12-4-04	"	"	"	"	328	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
13-4-04	"	"	"	"	329	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
14-4-04	"	"	"	"	330	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
15-4-04	"	"	"	"	331	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
16-4-04	"	"	"	"	332	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
17-4-04	"	"	"	"	333	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
18-4-04	"	"	"	"	334	TC-100, SK, JET, LUC BRUNEL, BENT	5	2
19-4-04	"	"	"	"	335	TC-100, SK, JET, LUC BRUNEL, BENT	5	2

Pilot's Signature E and Codeys

Pilot's Signature _____

David Lodge

Final Order

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Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Asymptotic	Category
203	B-727-314	N908JE	LIRP	LEMD		198	34, AM, SK, NC, VALBOURG AIRC		2	2
21	"	"	LEMD	JFK		199	34, AM, SK, NC, VALBOURG AIRC		7	6
22	"	"	JFK	PBI		200	34, AM, SK, NC, VALBOURG AIRC	1/1	2	6
26	G-1154B	N909JE	PBI	TJB		1638	34, AM, SK, NC, VALBOURG AIRC	1/1	2	5
30	"	"	TJB	TJB		1639	34, AM, SK, NC, VALBOURG AIRC		4	6
JUN 4	"	"	TJB	TJB		1640	34, AM, SK, NC, VALBOURG AIRC	1/1	3	8
4	B-727-407	N491GM	TJB	TJB		1641	34, AM, SK, NC, VALBOURG AIRC		2	5
7	G-1154B	N909JE	TJB	PBI		1642	34, AM, SK, NC, VALBOURG AIRC	1/1	2	6
11	"	"	PBI	TJB		1643	34, AM, SK, NC, VALBOURG AIRC		1	2
14	"	"	TJB	CYUL		1644	34, AM, SK, NC, VALBOURG AIRC		3	0
14	"	"	CYUL	PBI		1645	34, AM, SK, NC, VALBOURG AIRC		8	
17	B-727-314	N908JE	PBI	MYNN		201	34, AM, SK, NC, VALBOURG AIRC		2	6
17	"	"	MYNN	JFK		202	34, AM, SK, NC, VALBOURG AIRC		3	0
29	"	"	TJB	JFK		203	34, AM, SK, NC, VALBOURG AIRC	1/1	2	4
JUL 2	"	"	JFK	PBI		204	34, AM, SK, NC, VALBOURG AIRC	1/1	2	6
7	G-1154B	N909JE	PBI	TJB		1646	34, AM, SK, NC, VALBOURG AIRC	0/0	2	4
11	"	"	TJB	PBI		1647	34, AM, SK, NC, VALBOURG AIRC	1/1	2	5
14	"	"	PBI	TJB		1648	34, AM, SK, NC, VALBOURG AIRC	1/1	8	
14	"	"	TJB	MYV		1649	34, AM, SK, NC, VALBOURG AIRC	9/6	49	9
Page Total									9102	5
Amount Forward									9152	4
Total to Date									33	118

I certify that the statements made by me on this form are true.

Pilot's Signature

[Signature]

CONFIDENTIAL DR_0000066

Date 19--	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRPLANE	HELICOPTER
2003	B-727-314	N908JE	JFK	PBI		215	IC, SK, MY LC, NL, 11-12-03	✓	25	
31	"	"	PBI	JSS		216	IC, BT, AM, GM, SK, GARY ROXBOROUGH	✓	24	
4	B747-407	N491CM	LSS	TSS				0/0		
5	"	"	TSS-LSS	TSS						
10	B-727-314	N908JE	TSS	JFK		217	IC, AM, BT, CM, 11-12-03	✓	30	
10	"	"	JFK	PBI		218	IC, AM, BT, CM, 11-12-03	✓	25	
13	G-1159B	N909JE	MIN	TBB		164	IC, AM, BT, CM, 11-12-03	✓	38	
13	"	"	TBB	SAF		165	IC, SK, GM	✓	38	
20	"	"	SAF	ASG		1651	IC, GM, SK	✓	38	
20	"	"	ASG	TBB		1652	IC, GM, SK, TM	✓	23	
22	"	"	TBB	PBI		1653	IC, GM, SK, TM	✓	9	
31	B-727-314	N908JE	PBI	JAX		219	IC, BT, CM, SH, 11-12-03	✓	25	
31	G-1159B	N909JE	PBI	TBB		1654	IC, BT, CM, SH, 11-12-03	✓	3	
31	"	"	TBB	TBB		1655	IC, BT, CM, SH, 11-12-03	✓	40	
548	"	SEMULSON	LGB	LGB			IC, BT, CM, SH, 11-12-03	✓	40	
17	"	"	LGB	LGB			IC, BT, CM, SH, 11-12-03	✓	40	
18	"	"	LGB	LGB			IC, BT, CM, SH, 11-12-03	✓	40	
22	"	N909JE	PBI	TSS		1662	IC, BT, CM, SH, 11-12-03	✓	26	
26	B-727-200	58MULSON	MSP	MSP			IC, BT, CM, SH, 11-12-03	✓	20	
Page Total									12	431
Amount Forward									6755	91524
									6717	11945
									33	1181
									33	1197

I certify that the statements made by me on this form are true.

(i) 10m.

CONFIDENTIAL DR_000067

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AIRPLANE	GLIDER
2003	B-727-200	SEAULATON	MIA	MIA			RE-PAINTING & EXAMINE		20	
9/21	C-172	N5279X	LNA	LNA			DATA - Safety check 2/11/03	3/3	5	
27	"	"	"	"			GO AWAY - EXAMINE	2/2	8	
29	G-1159B	N909JC	PBI	T&B		1604	GM		24	
30	"	"	T&B	PBI		1605	AM, FRAM, PAULA EPSTEIN		26	
31	"	"	PBI	T&B		1606	JE, AM, SK, TD, VC	V1	25	
2	BH-407	N491GM	PBI	MNN			LARRY VIZZARE			
2	BH-407	N491GM	MYEF	MDPV			LV			
3	"	"	MDPP	MDPC			LV			
3	"	"	TEST	TEST			LV			
3	BH-407	N909JC	T&B	PDI		1607	JE, AM, SK, TD		26	
6	"	"	PBI	B&D		1608	JE, AM, SK, TD	V1	28	
7	"	"	B&D	T&B		1609	JE, TD		10	
11	"	"	T&B	PBI		1610	JE, AM, SK, TD, CAROLINA	V1	27	
14	"	"	PBI	T&B		1611	JE, AM, SK, TD		25	
16	"	"	T&B	PBI		1612	JE, AM, SK, TD		26	
19	"	"	PBI	T&B		1613	JE, AM, SK, TD, CAROLINA	V1	27	
21	"	"	T&B	MTN		1614	JE, AM, SK, TD	V1	7	
21	"	"	MTN	TEST		1615	JE, AM, SK, TD, CAROLINA	V1	36	
I certify that the statements made by me on this form are true.									Page Total	5
									Amount Forward	331197
									Total to Date	331250

Pilot's Signature

David Kellogg

CONFIDENTIAL DR_000068

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					ADDITIONAL	HELICOPTER
2003										
26	6-1159B	N909JE	TEB	TEB		1676	JE, AM, SK, TO, LC		3	9
26	"	"	TEB	MIV		1677				9
27	B-727-31H	N908JE	JAX	JAX		220		✓	1	4
28	"	"	JAX	PBI		221			1	0
30	"	"	PBI	JFK		222			2	5
30	"	"	JFK	LFB		223	JE, AM	✓	6	9
Nov 4	"	"	LFB	GBR		224	JE, AM, SK			9
4	"	"	GBR	ENG		225	JE, AM, BAC BAND G.M. HUBER, 30000 PREVIOUSLY BAC BAND, 3K		1	8
4	"	"	ENG	GSA		226	JE, AM, G.M. SK			9
5	"	"	GSA	ENG		227	JE, AM, G.M. SK	✓		9
5	"	"	ENG	UNNT		228	JE, AM, G.M. SK, BAC BAND HUBER, 30000 PREVIOUSLY BAC BAND, 3K	✓	5	3
6	"	"	UNNT	VHAT		229	JE, AM, G.M. SK, BAC BAND HUBER, 30000 PREVIOUSLY BAC BAND, 3K	✓	6	5
9	"	"	VHAT	ZUUV		230	JE, AM, G.M. SK, BAC BAND HUBER, 30000 PREVIOUSLY BAC BAND, 3K		2	4
9	"	"	ZUUV	ZBAA		231	JE, AM, G.M. SK, BAC BAND HUBER, 30000 PREVIOUSLY BAC BAND, 3K		2	2
11	"	"	ZBAA	PANC		232	JE, AM, G.M. SK, BAC BAND HUBER, 30000 PREVIOUSLY BAC BAND, 3K	✓	7	8
11	"	"	PANC	JFK		233	JE, AM, SK	✓	6	3
14	"	"	JFK	PBI		234	JE, AM, SK, BAC BAND, LC		2	5
18	"	"	PBI	JFK		235	JE, AM, SK, LC	✓	2	6
21	"	"	JFK	CMA		236	JE, AM, SK		1	5
Total									4	58
Amount Forward									9227	5
Total to Date									9285	7

I certify that the statements made by me on this form are true.

Pilot's Signature: Daniel Ledez

Page Total

Amount Forward

Total to Date

Pencil Signature

CONFIDENTIAL DR_0000070

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					APRPLAN	GLS0007
2004	B-727-31H	N908JG	PBI	JFK		243	JC, BT, NM, SK, TD	LV	2	6
23	"	"	JFK	PBI		244	JC, BT, CHAUNCE DAVES, TD, NM, ALBERTA MERRITT	LV	2	6
26	G-1159B	N909JG	PBI	TJB		164	JC, BT, NM, TD	LV	2	4
28	"	"	TJB	TJST		169	JC, BT, NM, SK, TD	LV	3	6
28	"	"	TJST	TJB		163	JC, BT, JLB, NM, TD, SK, ALBERTA MERRITT	LV	4	1
5	"	"	TJB	BED		164		LV	8	
5	"	"	BED	TJB		165	ALAN DEBSHOWITZ	LV	1	1
5	"	"	TJB	PBI		1616	JC, AD, SK	LV	2	6
9	B-727-31H	N908JG	PBI	JFK		245	JC, BT, SK	GR	2	5
12	"	"	JFK	LFPB		246	JC, GM, JLB, ALBERTA MERRITT	LV	7	0
17	"	"	LFPB	BGR		247	JC, GM, JLB, NM, TD, AW	LV	6	9
17	"	"	BGR	JFK		248	JC, GM, JLB, TD, NM, AW	LV	1	5
19	"	"	JFK	PBI		249	JC, BT, NM, SK, TD	LV	2	4
22	"	"	PBI	JFK		250	JC, BT, NM, TD, AW	LV	3	0
24	"	"	JFK	MRY		251	JC, SK, TD, NM, FOREST SAWYER	LV	5	9
27	"	"	MRY	VNY		252	JC, NM, SK, TD	LV	8	
29	"	"	VNY	ABQ		253	JC, NM, SK, TD	LV	1	6
29	"	"	ABQ	JFK		254	JC, GM, NM, SK, TD	LV	3	4
3	"	"	JFK	PBI		255	JC, NM, TD, VALDON CORREY	LV	2	5
Page Total									6	1
Amount Forward									674	5
Total to Date									6750	33125

I certify that the statements made by me on this form are true.

Daniel Pedalino

Signature of Pilot

CONFIDENTIAL DR_000071

Date	Altcraft Make and Model	Altcraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Altcraft Category...	
			From	To					AIRPLANE	HELICOPTER
2-20-04	G-1159B	N904JE	PBI	TGB		1647	JE, NM, TD	✓	2	8
8	"	"	TGB	BGD		1648	JE, TD	✓	8	
9	"	"	BGD	TGB		1649	JE, TD	✓	1	1
11	"	"	TGB	PBI		1700	JE, TD, SK, NM	✓	2	6
13	"	"	PBI	TISJ		1701	JE, TD, SK, VC, NM	✓	2	3
17	B-727-200	SPMUL-000	MIA	MIA		1702	LARRY SUMMERS	✓	2	0
17	"	"	MIA	MIA			HANDING LARRY SUMMERS		2	0
17	"	"	MIA	MIA			FLIGHT REPT		2	0
18	"	"	MIA	MIA			HANDLING		3	0
18	"	"	MIA	MIA			REY BARRAZA		3	0
19	G-1159B	N909JE	TISJ	PBI		1702	JE, SK, TD, VC		2	6
31	B-727-31H	N908JE	PBI	JFK		236	JE, NM, TD	✓	2	3
6	G-1159B	N909JE	JFK	PBI		257	JE, ILB, NM, TD	✓	2	5
11	B-727-31H	N908JE	PBI	TISJ		1705	JE, BT, NM, SK, TD	✓	2	3
15	"	"	JFK	JFK		258	JE, BT, CD, CA, TO, CM, NM, TD	✓	2	4
16	"	"	BGD	PBI		259	JE, SK, LARRY SUMMERS	✓	9	
19	"	"	PBI	JFK		260	JE, SK	✓	2	6
22	"	"	JFK	PBI		261	JE, SK, JENNIFER	✓	2	6
			JFK	PBI		262	JE, BT, MARK SPSTEN, NM	✓	2	5
							TD, JAMES, CM	✓	4	3
Page Total									9388	33125
Amount Forward									6750	33125
Total to Date									6759	33125

I certify that the elements made by me on this form are true.

Pilot's Signature

David Reddy

CONFIDENTIAL DR_000072

Date +9	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					AFRPA	General
2003 APR 27	B-727-314	N90836	PBI	JFK		263	36, BT, NM, TD	1	2	2
MAY 1	"	"	JFK	PBI		264	36, NM, SK	1	2	6
4	"	"	PBI	JFK		265	36, NM, SK	1	2	4
5	"	"	JFK	LFPB		266	36, NM, SK	1	6	9
8	"	"	LFPB	EGGW		267	36, NM, SK	1	9	
10	"	"	EGGW	LKPR		268	36, NM, SK	1	1	8
12	"	"	LKPR	LFPB		269	36, NM, SK	1	1	4
14	"	"	LFPB	CYQX		270	36, NM, SK	1	5	8
14	"	"	CYQX	PBI		271	36, NM, SK	1	4	2
15	G-159B	N90946	PBI	PBI		1707	REN	1	7	
17	"	"	PBI	TGB		1708	36, BT, NM, TD	1	3	2
21	"	"	TGB	PBI		1709	36, BT, NM, TD	1	2	4
24	"	"	PBI	TJSJ		1710	36, NM, SK, TD	1	2	6
31	"	"	TJSJ	TGB		1711	36, NM, SK, TD	1	4	2
JUN 4	"	"	TGB	HVN		1712	BT	1	5	
4	"	"	HVN	PBI		1713	36, BT, MS, NM, TD	1	2	7
7	"	"	PBI	TGB		1714	36, BT, MS, NM, TD	1	2	5
9	"	"	TGB	BEO		1715	36, MS, SK	1	9	
9	"	"	BEO	TGB		1716	36, MS, SK	1	8	
I certify that the statements made by me on this form are true.									Page Total	
									77	487
									Amount Forward	9431
									Total to Date	33125

Pilot's Signature

David Reddy

CONFIDENTIAL DR_000073

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					ATIS	PAR	GLD
10-11-59	G-1159B	N909JE	TEB	MDW		1710	JE, SK	1/1	1	9	
11	"	"	MDW	PBI		1715	JE, SK		2	7	
13	B-727-314	N908JE	PBI	JFK		2705	JE, SK, A.O. GOS, MAM		2	5	
15	"	"	JFK	TIST		2735	JE, BT, MS, SK, TD	1/1	3	5	
20	"	"	TEST	PBI		2745	JE, BT, MS, SK, TD	1/1	2	5	
21	G-1159B	N904JE	PBI	TEB		1715	JE, BT, MS, NM		2	6	
23	"	"	TEB	SAC		1720	JE, NM, SK	1/1	4	4	
24	"	"	SAC	LAS		1721	JE, NM, SK, SEM, NM, SK	1/1	1	6	
2	"	"	LAS	SAC		1722	JE, NM, SK, SEM, NM, SK		1	3	
4	"	"	SAC	ASC		1723	JE, MS, NM, SK, SEM, NM, SK	1/1	9		
4	"	"	ASC	PBI		1724	JE, MS, NM, SK, SEM, NM, SK	1/1	3	8	
11	"	"	PBI	TEB		1725	JE, NM, SK, SEM, NM, SK		2	7	
15	"	"	TEB	PBI		1726	JE, NM, SK, SEM, NM, SK	1/1	2	6	
19	B-727-314	N908JE	PBI	TIST		2755	JE, NM, SK, SEM, NM, SK		2	6	
22	"	"	TIST	PBI		2765	JE, NM, SK, SEM, NM, SK		2	6	
25	"	"	PBI	JFK		2775	JE, NM, SK, SEM, NM, SK	1/1	2	4	
29	"	"	JFK	LGPB		2785	JE, MS, NM, SK, TD	1/1	6	6	
30	"	"	LGPB	LGPB		2795	JE, MS, NM, SK, TD	1/1	1	7	
3	"	"	LGPB	LGPB		2805	JE, MS, NM, SK, TD	1/1	3	6	
Page Total									11/9	225	
Amount Forward									6196	94718	33125
Total to Date									6177	95323	33125

I certify that the statements made by me on this form are true.



David R. Berman

I certify that the statements made by me on this form are true.

Fiavel Roden

I certify that the statement/s made by me on this form are true.

Pilot's Signature _____

CONFIDENTIAL DR_000076

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Aircraft Category...	Rec'd
2004 Nov 18	G-1159B	N909JE	TAB	PBI		1740	JE, NM, SK, DM, LV	1	23	
2004 Nov 20	B-727-314	N908JE	JAX	JAX	335	335	LV	1	26	
2004 Nov 20	"	"	JAX	PBI	336	336	LV	1	10	
2004 Nov 23	"	"	PBI	TEST	337	337	JE, NM, SK, DM, LV	1	23	
2004 Nov 26	G-1159B	N909JE	PBI	TEST	1741	1741	GM, JK LV	1	24	
2004 Nov 28	B-727-314	N908JE	TEST	JFK	338	338	JE, NM, SK, DM, LV	1	40	
2004 Nov 28	"	"	JFK	PBI	339	339	JE, NM, SK, DM, LV	1	28	
2004 Nov 14	B-727-200	SEMOLATED	MID	MID			HANK COLLEGE - INSTRUCTOR		10	
2004 Nov 15	"	"	"	"			HANK COLLEGE - INSTRUCTOR		17	
2004 Nov 15	"	"	"	"			HANK COLLEGE - INSTRUCTOR		17	
2004 Nov 21	G-1159B	N909JE	PBI	TEST	1742	1742	JE, NM, SK, DM, LV	1	23	
2004 Nov 29	"	"	TEST	TNEM	1743	1743	JE, NM, SK, DM, LV	1	7	
2004 Nov 29	"	"	TNEM	TEST	1744	1744	JE, NM, SK, DM, LV	1	7	
2004 Nov 30	B-727-407	N491GM	TEST-LJS	TEST			LV			
2004 Nov 30	"	"	LJS	TEST			LV			
2004 Nov 30	G-1159B	N909JE	TEST	TQPF	1745	1745	JE, NM, SK, DM, LV	1	6	
2004 Dec 1	"	"	TQPF	PBI	1746	1746	JE, NM, SK, DM, LV	1	32	
2004 Dec 3	"	"	PBI	TEST	1747	1747	JE, NM, SK, DM, LV	1	27	
2004 Dec 6	"	"	TEST	PBI	1748	1748	JE, NM, SK, DM, LV	1	27	
Page Total: 7/5 355 Amount Forward: 6187 9839 4 33 12.5 Total to Date: 6187 9839 4 33 12.5										

I certify that the statements made by me on this form are true.

F. J. J. J. J.

Child Data

Edward O. Dowd

CONFIDENTIAL DR_0000079

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					1250-340	1250-340
2005-08-03	G-1151B	N404JE	PBI	TEB		1781	JE, AM, SK	LV	25	
10	"	"	TIST	TEB		1782	JE, AM, DB, NM	BH	46	
18	"	"	PBI	TEB		1783	JE, DB, SK	LV	26	
20	"	"	TEB	BKL		1784	GM, LAN	JLM Down	12	
20	"	"	BKL	TEB		1785	GM, LAN	JLM Down	12	
22	"	"	TEB	PBI		1786	JE, SK, DB, TATIANA	BH	25	
25	"	"	PBI	TEB		1787	JE, SK, DB, TATIANA	BH	26	
28	"	"	TEB	TIST		1788	JE, NM, JK	BH	39	
Aug 1	"	"	TIST	TEB		1789	JE, JK, NM	BH	38	
2	"	"	TEB	SAF		1790	JE, SK, DB, AM, ALEX, NATALIA	BH	36	
18	"	"	TEB	PBI		1804	JE, AM, NM, JK, DB, SK, NM, TATIANA	BH	23	
22	"	"	PBI	TEB		1805	JE, NM	LV	25	
24	"	"	TEB	FDK		1807	JE, DB	LV	8	
24	"	"	FDK	TEB		1808	JE, DB	LV	8	
26	"	"	TEB	MVY		1809	JE, DB, SK, DM	LV	8	
26	"	"	MVY	TIST		1810	JE, DB, DM, SK	LV	33	
27	"	"	TIST	PBI		1811		LV	26	
28	"	"	PBI	TEB		1814	JE, DB, GM, AM	BH	24	
8	B-747-200	SI-MUL-005	MFA	MFA			HAL LENO-ENSTRICTOR	LM	20	
Pups Total									12/11	454
Amount Forward									4767	4
Total in Book									6025	3

I certify that the statements made by me on this form are true.

David R. Riddick

D.R. Riddick

CONFIDENTIAL DR_000080

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	
			From	To					Approximate	Hours
2005 508	B-727-200	SRM00000	MIA	MIA						
11	G-1159B	N909JE	PBI	TIST		1816	JE, AM, NM WAL LENO v RDC LYNCH			20
13	"	"	TIST	TIB		1817	JE, AM, NM	V1		26
14	"	"	TIB	BED		1818	JE, AM, SK			38
14	"	"	BED	HPN		1819	JE, AM, SK, LARRY SUMMERS			8
20	"	"	PBI	TIST		1821	JE, DB, SK, JIM	V		25
24	"	"	TIST	TIB		1822	JE, AM, SK, TATIANA SEMENOV			37
25	"	"	TIB	GMI		1823	JE, NM, SK, PAUL HALON	V1		14
25	"	"	GMI	TIB		1824	JE, NM, SK	V1		14
27	"	"	TIB	BED		1825	JE, AM, NM			8
27	"	"	BED	TIB		1826	JE, AM, NM			10
28	B-727-31A	N908JE	LCQ	LCQ		343	JE, AM, NM GEORGE GOSSEL	V1		17
22 NOV	"	"	TIST	JFK		348	JE, AM, NM	0/0		37
2	G-1159B	N908JE	TIB	BED		1834	JE, GM, SK, TATIANA, DB			8
2	"	"	BED	QUU		1835	GM			5
2	"	"	QUU	BED		1836	GM			5
2	"	"	BED	TIB		1837	JE, DB, GM, SK, TATIANA			9
3	B-727-31A	N908JE	JFK	TIST		351	JE, NM, SK			44
8	"	"	TIST	JFK		352	JE, AM, SK, TATIANA, DB, GM, SK, LARRY SUMMERS, PAUL HALON, GEORGE GOSSEL, WILSON			39
Total								5/4	372	
Amount Forward								6815	9812.8	33
Total to Date								6830	9850.0	33

I certify that the statements made by me on this form are true.

Pilot's Signature Daniel Rodriguez

Pilot's Signature: Fixed Cost

Instructions

Master/Sub-01

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		...and Class	
			From	To					Assigned	Class	SEL	MCL
2006 JAN 23	G-1159B	N404JE	SAC	TEB		1857	JE, IZ, NM, SK, LC, TATYANA SIMONOV, HARMON WILSON, LEO NIKOLAEV, GREGORY ENYKIN	0/0	3	3		3
26	"	"	TEB	TIST		1858	JE, IZ, NM, JORDAN		3	4		3
31	"	"	TIST	BCD		1859	JE, ADRIN, MUCENSKA, NM		3	8		3
31	"	"	BCD	TEB		1860	JE, AM, NM		1	0		1
FEB 15	"	"	TIST	BCD		1863	GARY KENNEL		4	0		4
15	"	"	BCD	BCD		1864	ALAN PERSBOWITZ, GARY KENNEL	1/1	3	0		3
16	"	"	PBI	PBI		1865	ALAN PERSBOWITZ, GARY KENNEL	1/1	2	4		2
21	"	"	PBI	TEB		1866	MATCH	1/1	4	1		4
22	"	"	TIST	TEB		1867	JE, IZ, NM		9			
22	"	"	TEB	BCD		1868	JE, NM		9			
24	"	"	BCD	TEB		1869	JE, NM		9			
26	"	"	TEB	TIST		1870	JE, IZ, NM, SK, LC, TATYANA SIMONOV, HARMON WILSON, LEO NIKOLAEV, GREGORY ENYKIN	1/1	3	0		3
27	"	"	TIST	TEB		1871	JE, IZ, NM, SK, LC		4	1		4
28	"	"	TIST	TEB		1872	JE, IZ, NM, SK, LC, TATYANA SIMONOV, HARMON WILSON, LEO NIKOLAEV, GREGORY ENYKIN	1/1	4	2		4
13	"	"	TEB	BCD		1873	JE, NM, ST		8			
14	"	"	BCD	TEB		1874	JE, NM, ST		1	0		1
16	"	"	TEB	TIST		1875	JE, IZ, NM, SK, LC, DANA BURNS	1/1	3	4		3
23	B-727-200	SEMILOV	MIA	MIA		1876	HAL LAYTON - SIMONOV, HARMON WILSON, LEO NIKOLAEV, GREGORY ENYKIN		2	0		2
23	"	"	"	"			B-727 DIRECT REAR		2	5		2
24	"	"	"	"			RAY BARZAN		2	0		2
							RAY BARZAN, WILSON, HAL	5/5	50	2		
							Page Total	657	9809	0	33	129
							Amount Forward	6416				
							Total to Date	6416	9400	0	33	129
								6416				87

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodger

I certify that the statements made by me on this form are true.

Pilot's Signature _____

David Rodgers


Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		SEL	MEL	H/L LAM
			From	To					ATPL/PL/CL	GLIDER			
2006 JUL 18	B-727-31H	N908JE	EGGW	LFPB		386	JG, GM, SK		10			10	
20	"	"	LFPB	JFK		387	JG, SK	1/1	77			77	
22	"	"	JFK	PBI		388	JG, SK, JK, JUMPER STARDOWN		30			30	
23	G-1159B	N909JE	PBI	TIST		1895	JG, SK, JK, JUMPER STARDOWN		26			26	
23 AUG 16	"	"	TIST	EWB		1891	JG, SK, JK, JUMPER STARDOWN	0/	36			36	
17	"	"	TEB	EGGW		1896	JG, SK, JK, JUMPER STARDOWN	1/1	65			65	
19	"	"	EGGW	LEIB		1897	GM	1/1	25			25	
25	"	"	LEIB	EGGW		1898	GM	1/1	23			23	
28	"	"	EGGW	LFTH		1899	GM	1/1	17			17	
28 SEP 1	"	"	LFTH	LFBG		1900	GM, KEVIN MAXWELL, LADY ROSE	1/1	12	CONFIDENTIAL	DR 000084	12	
2	"	"	LFBG	EGGW		1901	GM, KEVIN MAXWELL, LADY ROSE	1/1	15			15	
2	"	"	EGGW	EGPH		1902	GM, FRANCES ANDREW - DUK OF YORK, JUMPER STARDOWN	1/1	10			10	
2	"	"	EGPH	CYQX		1903	GM	1/1	45			45	
22	B-727-31H	N908JE	CYQX	TEB		1904	GM	1/1	28			28	
22	"	"	EWB	MDA		398	GM, DANA BURNS, JUMPER STARDOWN	1/1	25			25	
23	"	"	MDA	TIST		399	GM, DANA BURNS, JUMPER STARDOWN	1/1	25			25	
24	G-1159B	N909JE	TIST	VQQ		400	GM, DANA BURNS, JUMPER STARDOWN	1/1	29			29	
24 OCT 2	"	"	TEB	TIST		1905	GM, DANA BURNS, JUMPER STARDOWN	1/1	36			36	
2	"	"	TIST	BED		1906	GM, DANA BURNS, JUMPER STARDOWN	1/1	39			39	
I certify that the statements made by me on this form are true.													
Pilot's Signature													
2176878274													
2176878845													

Daniel Rodriguez

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NATION

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	SEL MEL
			From	To						
2006 OCT 2	G-1159B	N909JE	BED	T&B		1957	JE, NADIA MARGENKOV, SARAH KELLER, LV DANIEL BUBER, ANDREA WELLS, LV JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA		ADOLPH GUYER HELZINGER	SEL MEL
6	"	"	T&B	TIST		1908	JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA		44	4
26	"	"	TIST	T&B		1913	JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA	1/1	42	4
27 NOV	"	"	T&B	TIST		1914	JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA		34	3
9	"	"	DFW	DFW			JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA		40	4
13	B-727-31H	N908JE	ABQ	TIST		405	JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA	1/1	49	4
20	"	"	TIST	EWIR		406	JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA		37	3
21	"	"	EWIR	ABQ		407	JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA		43	4
25	"	"	ABQ	TIST		408	JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA		51	5
27	BHT-407	N491GM	PBI	FXE			TO CAN AIR FUL MANT		CONFIDENTIAL BR 000085	
27	"	"	FXE	PBI			FROM CAN AIR FUL MANT			
DEC 1	B-727-200	SEQUOIA	MIA	MIA			WILLIAM, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA	20	20	2
1	"	"	MIA	MIA			WILLIAM, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA	20	20	2
10	G-1159B	N909JE	EWIR	TIST		1918	JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA	1/1	34	3
14	"	"	TIST	EWIR		1920	JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA		39	2
21	"	"	EWIR	PBI		1921	JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA	1/1	25	3
21	"	"	PBI	ISP		1922	JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA	1/1	25	2
2007 JAN 7	B-727-31H	N908JE	TIST	EWIR		416	JE, LANCE CALLOWAY, BOB A MARGENKOV, LV NIA VALYA, MARY SHAY, VIKESSA	1/1	39	3
I certify that the statements made by me on this form are true.										
<div style="text-align: right;">  Pilot's Signature </div>										
Page Total								5/4	591	10
Amount Forward								6860	10,061	33
Total to Date								6860	10,120	33
								6465	10,120	33
									1327	7
									1337	7

Date to	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			...and Class		
			From	To					AIRPLANE	GLIDER	HELICOPTER	SEL	MEL	
2007 JAN 12	B-727-311H	N908JE	EWR	TIST		417	JE, IZ, WALTER CROWKITE, NM, SK, LC, JOHN AMERLING	BH LM	3	3			3	
16	"	"	TIST	BED		418	JE, IZ, LC, NM, SK MARTIN NOWAK, PRALAND CUOMO	LV LM	3	7			3	
16	"	"	BED	EWR		419	JE, NM, SK	LV LM	1	2			1	
20	"	"	EWR	LFPB		420	JE, GM, LL, NM, SK RICK SEMSKI	LV LM	1	6			6	
21	"	"	LFPB	EDDM		421	JE, SK, NM	RS LV LM	1	4			1	
22	"	"	EDDM	LFPB		422	JE, SK, NM	RS LV LM	1	6			1	
27	"	"	LFPB	EWR		423	JE, SK, NM, LC, JLB	RS LV LM	7	6			7	
31	"	"	EWR	TIST		424	JE, ANDREW FARGUS, IZ JK, NM	BH GEORGE CENER	3	3			3	
FEB 11	BHT-407	N491GM	TIST	LST				LV BH					1	
11	"	"	LST	TIST				LV BH					1	
12	B-727-311H	N908JE	TIST	BED		425	JE, CATHERINE DERBY, JK NM	LV BH	3	8	CONFIDENTIAL DR_000086		3	
12	"	"	BED	EWR		426	JE, CATHERINE DERBY, JK NM	LV BH	1	0			1	
20	"	"	TIST	EWR		428		LV BH	4	0			4	
20	G-1159B	N909JE	ISP	EWR		1413	LARRY VISOSKI	BH		9			2	
22	"	"	EWR	TIST		1921		LV	3	5			4	
27	"	"	TIST	EWR		1925		BH	1	1			2	
27	"	"	EWR	ISP		1926		BH		6			1	
MAR 1	B-727-200	SIMULATOR	MIA	MIA			ROCK MANNAB - INSTRUCTOR WILLIAM LEONARDO - CREW LEONARDO - CREW	CALLIA MCA, RTO, VICUT		2	0		2	
2	"	"	MIA	MIA			ROY BARZANA - INSTRUCTOR WILLIAM LEONARDO - CREW LEONARDO - CREW	LEO GABRIANO LEO GABRIANO		1	5		1	
I certify that the statements made by me on this form are true.								Page Total	1/2	50	3		2	
Pilot's Signature: <u>David Rodgers</u>								Amount Forward	6865	10,120	4	33	133	7
								Total to Date	6866	10,170	7	33	133	9

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21768799

Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Manuevers, Endorsements	Number of Landings	Aircraft Category...			...and Class		Helicopter	Conc
			From	To					AIRPLANE	GLIDER	HELICOPTER	SEL	MEL		
2007															
MAR 16	B-727-31H	N908JE	EWR	TIST		433	CLINT WUNDERLY	1/1	3	5					
20	"	"	TIST	PHL		434	LV		3	6					
20	"	"	PHL	EWR		435	LV			8					
23	G-1159B	N909JE	ISP	TIST		1927	LV	1/	3	5					
APR 12	B-727-31H	N908JE	EWR	TIST		436	LV	1/	3	8					
18	"	"	TIST	EWR		437	LV		4	1					
MAY 1	G-1159B	N909JE	TIST	EWR		1932	BT	1/1	4	0					
15	"	"	EWR	CYXU		1933	TO PAINT SHOP (CUSTOMS)	LV	1/1	1	5				
15	"	"	CYXU	CYCE		1934	TO PAINT SHOP	LV	1/1	3					
17	B-727-31H	N908JE	EWR	BED		443	LV			9					
18	"	"	BED	TIST		444	LV	1/	3	9					
31	S-76C	SIMULATOR	PBI	PBI			USE OF CHECKLIST, IIDS					1	5		
JUN 1	"	"	PBI	PBI			ENGINE HOT STARTS, POWER ASSURANCE CHECK					1	5		
2	"	"	PBI	PBI			ENGINE FAILURE, AUTO ROTATION, PITCHING, PEDAL TURNS					1	5		
3	"	"	PBI	PBI			ENGINE FAILURE, 30 SECOND POWER, 2 MINUTE POWER, FMS, HSE, AUTO PILOT 30KTS					1	5		
5	"	"	PBI	PBI			STEEP TURNS, AUTO PILOT, CORC TRIM					4	0		
6	"	"	PBI	PBI			ENGINE FIRE, ENGINE SHUTDOWN, CONFINED AREAS, SINGLE ENGINE LANDINGS, RTO, MAXIMUM					4	0		
7	"	"	PBI	PBI			FMS OPERATIONS, HOLDING, UNUSUAL ATTITUDES					4	0		
8	"	"	PBI	PBI			SINGLE ENGINE ILS APPROACH					3	7		
							BLOW LANDING GEAR DOWN, SINGLE SERVO FAILURE, DUAL SERVO FAILURE, DECU MAJOR, MCB HOT DEL					3	7		
I certify that the statements made by me on this form are true.								Page Total	7/4	29	9	21	7		
								Amount Forward	6866	14170	7	33	133	9	
								Total to Date	6873	10200	6	33	155	6	

Pilot's Signature

Daniel Rodas

CONFIDENTIAL DR-000087

2176	8	7993	9	457	85
2176	8	8023	8	492	86

Date 2007	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			...and Class	
			From	To					AIRPLANE	GLIDER	HELICOPTER	SEL	MEI
5-6-03	BH-4610	FTD	BELL TX	BELL TX			FADEL TRAINING				10		
5-7-03	"	"	BELL TX	BELL TX			FADEL TRAINING				10		
20 JUN 9	SK-76C+	SIMULATOR	PBE	PBE			STUCK PEDALS, FIXED PITCH, CABLE FAILURE DURING AUTO ROTATIONS, CONFUSED LANDING PROCED SETTLING WITH POWER, DUAL SERVO FAILURE, FIXED PITCH, BRAKE FAILURE, NO TAIL RUDER AUTO ROTATIONS				40		
10	"	"	PBE	PBE							40		
19	B-727-31H	N908JE	EWR	TIST	450			LV	37				
22	"	"	TIST	CMH	451			LV CW	40				
23	"	"	CMH	EWR	452			LV CW	14				
25	"	"	EWR	MIA	453			LV CW	26				
26 JUL 9	"	"	TIST	EWR	457			LV CW	38				
19	G-1159B	N909JE	CYCE	CYXU	1935	EMERGENCY - BLOW NOSE GEAR DOWN		LV	14				
20	"	"	CYXU	PTK	1936			LV	10				
21	B-727-31H	N908JE	EWR	EWR	460			LV CW	10				
22	"	"	EWR	TIST	461			LV CW	38				
22	"	"	TIST	MIA	462			LV CW	27				
23	B-727-200	SIMULATOR	MIA	MIA		HAL LETO JOE GLEESON FC RECURRENT			20				
24	"	"	MIA	MIA		REY BARRAZA - FC FC HAL LETO JOE GLEESON			10				
30	G-1159B	N909JE	TIST	TGB	1940			BH	38				
31	"	"	TGB	MIA	1941			BH	27				
31	B-727-31H	N908JE	MIA	EWR	463			BH CW	27				
I certify that the statements made by me on this form are true.								Page Total	6/5	376		100	
Pilot's Signature <u>David Lodge</u>								Amount Forward	6873 6471	10200	6	33	1556
								Total to Date	6879 6476	10238	2	33	1656

2176	8	802
2176	8	804

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			...and Class		Held For Landing
			From	To					PLANE	GLIDER	HELICOPTER	SEL	MEL	
2007														
AUG 12	BHT-407	N491GM	TIST	TIST										3
13	B-727-31H	N908JE	TIST	EWR	465		LV		37				37	
15	G-1159B	N909JE	MIA	PBI	1902		LV		5				5	
16	B-727-31H	N908JE	EWR	VNY	466		LV		54				54	
16	"	"	VNY	ABQ	467		LV		17				17	
21	"	"	ABQ	MIA	468		LV		36				36	
21	"	"	MIA	TIST	469		LV		25				25	
27	"	"	TIST	EWR	470		LV		37				37	
29	G-1159B	N909JE	PBI	TEB	1943		LV	1/1	25				25	
30	"	"	TEB	HPN	1944		LV		5				5	
30	"	"	HPN	TIST	1945		LV		37	CONFIDENTIAL	DR_000089		37	
SEP 6	B-727-31H	N908JE	EWR	PBI	471		LV		24				24	
18	G-1159B	N909JE	TIST	TEB	1955		LV		36				36	
30	B-727-31H	N908JE	TIST	EWR	474		LV		36				36	
OCT 4	"	"	EWR	LFPB	475		LV		70				70	
12	"	"	LFPB	LPAZ	476		LV		33				33	
12	"	"	LPAZ	TIST	477		LV		54				54	
15	"	"	TIST	EWR	478		LV		37				37	
18	G-1159B	N909JE	TEB	BEO	1952		LV	1/1	10				10	
I certify that the statements made by me on this form are true.								Page Total	3/2	578			3	
Pilot's Signature <u>David Redegis</u>								Amount Forward	6879	10238	2	33	165	6
								Total to Date	6881	10296	6	33	165	9
									6476					
									6478					

2176 8861 5
2176 8819 251

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			...and Class			HOLDINGS
			From	To					PLANE	GLIDER	HELICOPTER	SEL	MEL	LANDINGS	
2007															
OCT 18	G-1159B	N909JE	BED	TIST	1957		BH		35					35	
25	"	"	EWR	TIST	1959		LV		36					36	
26	B-727-31H	N908JE	EWR	VQQ	471		LV		23					23	
NOV 6	G-1159B	N909JE	TIST	TEB	1962		LV	1/1	40					40	
8	"	"	TEB	TIST	1963		LV		38					38	
15	"	"	TEB	TIST	1965		BH		36					36	
17	"	"	TIST	BED	1966		BH	1/1	39					39	
17	"	"	BED	TEB	1969		BH	1/1	9					9	
21	"	"	TEB	TIST	1970		BH		35					35	
26	"	"	TIST	TEB	1971		LV		41					41	
DEC 2	"	SIMULATOR	DFW	DFW			HOLDING		40					40	
3	"	"	"	"					30					30	
11	"	N909JE	TIST	TEB	1976		LV		40					40	
13	"	"	TEB	PWM	1977		LV	1/1	10					10	
14	"	"	PWM	BED	1978		LV		8					8	
14	"	"	BED	TEB	1979		LV		11					11	
14	"	"	TEB	MZA	1980		LV		28					28	
18	"	"	TIST	PBI	1982		LV	1/1	28					28	
18	"	"	PBI	TEB	1983		LV		24					24	
I certify that the statements made by me on this form are true.								Page Total	5/5	551				551	
Pilot's Signature <i>David Rodgers</i>								Amount Forward	6881 6478	162960	33165	9	2176881192	514	
								Total to Date	6886 6483	103511	33165	9	2176881743	514	

Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Manoeuvres, Endorsements	Number of Landings	Aircraft Category...			Land Class	
			From	To					AIRPLANE	GLIDER	HELICOPTER	SCL	MEL
2007													
DEC 21	G-1159B	N909JE	TEB	TEST		1984	LV		35				35
2008													
JAN 6	"	"	TEST	TEB		1985	LV	1/1	39				39
	"	"	TEB	TEST		1986	LV		35				35
16	B-727-200	SIMULATOR	MIA	MIA					20				20
16	"	"	"	"					20				20
17	"	"	"	"					20				20
18	"	"	"	"					20				20
26	G-1159B	N909JE	EWB	TEB		1991	LV		5				5
FEB 5	"	"	TEST	TEB		1993	BH	1/1	42				42
8	"	"	TEB	SAF		1994	BH		4				4
12	"	"	SAF	MEA		1995	LV	1/1	37				37
13	"	"	MIA	TEB		1996	BH		24				24
15	"	"	TEB	TEST		1997	BH		34				34
24	"	"	TEST	TEB		1998	BH		40				40
27	"	"	TEB	BED		1999	LV		9				9
27	"	"	BED	TEB		2000	LV		10				10
29	"	"	TEB	TEST		2001	LV		35				35
MAR 6	B-727-31H	N908JE	VQQ	VQQ		480	LV		16				16
8	G-1159B	N909JE	TEB	BED		2003	BH		8				8
I certify that the statements made by me on this form are true.								Page Total	3/2	493			493
Pilot's Signature <i>David Rodas</i>								Amount Forward	6886	10351	1	33165	9
								Total to Date	6889	10400	4	33165	9
									6485				

SCL	MEL
	35
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	49
2176	88174
2176	88223

Instructions

Date 2008	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			...and Class			
			From	To					AIRPLANE	GLIDER	HELICOPTER	SEL	MEL		
MAR 8	G-1159B	N909JE	BED	TEB		2004	BH		1	0				1	
8	"	"	TEB	ACY		2006	BA			6					
9	"	"	ACY	TEB		2008	BH	1/1		7					
10	B-727/31H	N908JE	VQR	LCQ		481	BH LV			4					
16	G-1159B	N909JE	TIST	EWR		2010	LV			4	2			4	
21	"	"	EWR	SSI		2011	LV			2	0			2	
21	"	"	SSI	TIST		2012	LV			2	9			2	
24	"	"	TIST	TEB		2013	LV	1/1		3	7			3	
25	S-76	N908GM	MOS	RWE			LV			2	4		2	2	
25	S-76	N908GM	RWE	HXD			LV					2	1		
26	"	"	HXD	DAB			LV	1/1	CONFIDENTIAL					DR_000092	
26	"	"	DAB	PBE			LV					1	4		
28	G-1159B	N909JE	TEB	TIST		2014	LV			3	5				
APR 9	"	"	TIST	TEB		2016	BH			3	4				
15	"	"	TIST	TEB		2017	LV	1/1		3	7				
17	"	"	TEB	EINN		2018	LV			6	1				
18	"	"	EINN	LFPB		2019	LV			1	6				
22	"	"	LFPB	LLBG		2020	LV	1/1		4	2				
25	"	"	LLBG	LGIR		2021	LV			1	5				
I certify that the statements made by me on this form are true.								Page Total	4/3	39	5		7	5	
Pilot's Signature <u>David Rodgers</u>								Amount Forward	6889 6485	10400	4	33	165	9	2176 8 82
								Total to Date	6893 6488	10439	9	33	173	4	2176 8 82

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			...and Class		
			From	To					PLANE	GLIDER	HELICOPTER	SEL	MEL	
2008														
APR 25	G-1159B	N909JE	LGIR	LFPB	2622		LV		3	4			34	
29	"	"	LFPB	CYJT	2623		LV	1/1	5	8			58	
29	"	"	CYJT	TEB	2624		LV	1/1	2	5			25	
MAY 17	"	"	TIST	TEB	2625		BH	1/1	4	1			41	
22	"	"	TEB	TIST	2629		LV		3	5			35	
23	BHT-467	N491GM	LSJ	TIST			LV					2		
26	"	"	LSJ	LSJ			NVA					2		
27	G-1159B	N909JE	TIST	TEB	2630		LV	1/1	3	8			38	
29	B-727-31H	N908JE	PBI	LCQ	483		LV						9	
29	G-1159B	N909JE	TEB	MLV	2631		BH						7	
31	B-727-31H	N908JE	LCQ	VQQ	484		BH						4	
JUN 11	G-1159B	N909JE	TIST	PDK	2634		BH	1/1	3	9			39	
11	"	"	PDK	TEB	2635		BH	1/1	1	9			19	
JUL 2	B-727-31H	N908JE	VQQ	PBI	485		LV						9	
AUG 18	B-727-200	SIMULATOR	MIA	MIA					2	0			20	
OCT 21	G-1159B	N909JE	PBI	PBI	2045		LV		1	1			11	
NOV 20	"	"	"	"	2044		LV	3/3	1	0			10	
22	"	"	"	SEF	2045		LV			5			5	
22	"	"	SEF	PBI	2046		LV			5			5	
I certify that the statements made by me on this form are true.								Page Total	9/8	36	9		4	
Pilot's Signature: <i>Daniel Rodriguez</i>								Amount Forward	6893	10439	7	33	173	4
								Total to Date	6902	10476	8	33	173	8

CONFIDENTIAL DR_000093

2176	8	8263
2176	8	8300

Instructions

Date 40- 2008 DEC 9 2009 JAN 5 6 FEB 4 4 4 4 28 MAR 7 7 MAY 7 JUL 10 13 SEP 25 25 OCT 19 NOV 30 2010 JAN 6 6	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			...and Class						
			From	To					APPROX	GLIDER	HELICOPTER	SEL	MEL					
	B-727-31H	N908JE	PBI	LCQ		486	STALL STEEP TURN, CIRCULAR APPROACH, MISSED APPROACH, V-1 CUT, HOT BLEED HAD WINDSHIELD, RTO, NO FLAP LANDING, SE JLS SC GO AROUND, FLT HYD FAILURE PC WARM UP HAL LEXO INSTRUCTOR		1	0					1	0		
	G-1159B	SMULATOR	DFW	DFW					3	0						3	0	
	"	"	"	"					3	0						3	0	
	B-727-200	"	MIA	MIA			FE PC-RAY BIRZANO HAL LEXO	LV LM	1	5						1	5	
	"	"	"	"			FE PC-RAY BIRZANO HAL LEXO	LV LM	1	5						1	5	
	"	"	"	"			CAPTAIN WARMUP HAL LEXO INSTRUCTOR	LV LM	1	5						1	5	
	"	"	"	"			CAPTAIN PC-RAY BIRZANO	LV LM	1	5						1	5	
	B-727-31H	N908JE	LCQ	PBI		487		LV	1/1	1	0					1	0	
	G-1159B	N909JE	PBI	MANN		2648		LV		7						7		
	"	"	MANN	PBI		2649		LV								8		
	B-727-31H	N908JE	PBI	PBI		488		LV LM		9						9		
	G-1159B	N909JE	PBI	PBI		2650		LV		9						9		
	"	"	PBI	PBI		2651		LV		7						7		
	B-727-200	SMULATOR	MIA	MIA				LV LM		1	5					1	5	
	"	"	"	"						1	5					1	5	
	B-727-31H	N908JE	PBI	VQQ		489		LV LM	1/1	9						9		
	G-1159B	N909JE	PBI	PBI		2652		LV		1	2					1	2	
	"	"	PBI	TEB		2653		LV		2	5					2	5	
	"	"	TEB	PBI		2654		LV		2	5					2	5	
I certify that the statements made by me on this form are true.								Page Total	2/2	28	1					28	1	
Amount Forward								6902 6496	16476	8	3	3	173	8	2176	8	8340	8
Total to Date								6904 6498	10504	9	3	3	173	8	2176	8	8328	1
Pilot's Signature								David Rodriguez										

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			...and Class	
			From	To					PARAJUMP	GLIDER	HELICOPTER		
JAN 12	G-1159B	N909JE	PBI	TEB		2055						SEL	
13	"	"	TEB	PBI		2056	LV	2	9				
15	"	"	PBI	TIST		2057	LV	2	4				
15	"	"	TIST	PBI		2058	LV	1/1	2	4			
FEB 1	"	"	PBI	TEB		2059	LV	2	8				
2	"	"	TEB	BGD		2060	LV	2	4				
2	"	"	BGD	TEB		2061	LV		9				
2	"	"	TEB	BCT		2062	LV		9				
5	"	"	BCT	TIST		2063	LV	2	8				
5	"	"	TIST	PBI		2064	LV	2	3				
10	G-1159A	SIMULATOR	DFW	DFW			LV	2	9				
11	"	"	DFW	DFW			LV	2	9				
16	G-1159B	N909JE	PBI	TIST		2065	LV	3	4				
16	"	"	TIST	PBI		2066	LV	1/1	2	4			
18	"	"	PBI	TEB		2067	LV	1/1	2	9			
19	"	"	TEB	PBI		2068	LV	1/1	2	6			
23	"	"	PBI	TEB		2069	LV	1/1	2	6			
24	"	"	TEB	PBI		2070	LV	1/1	2	5			
27	B-727-31H	N908JE	VQQ	PBI		490	LV		2	8			
							LV		1	0			
I certify that the statements made by me on this form are true.													
Pilot's Signature <u>David Lodge</u>													
Page Total								4/4	463				
Amount Forward								6904					
Total to Date								6908	10504	9	33	173	8
								6502	10551	2	33	173	8

CONFIDENTIAL DR-000095

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2176 8

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Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	SEL	MEL
2010 MAR 2	G-1159B	N909JE	PBI TEB	2571	2571	LV	1/1	ADAPLANE	24	24
3	"	"	TEB BCT	2572	2572	LV			30	30
5	"	"	BCT TIST	2573	2573	LV	1/1		23	23
5	"	"	TIST PBI	2574	2574	LV			29	29
15	B-727-200	SPHULATOL	MIA MIA			LV			15	15
15	"	"	" "			LV			15	15
22	G-1159	NS30GA	PBI PTK	2575	2575	LV	1/1		24	24
25	G-1159B	N909JE	PBI TEB	2576	2576	LV			25	25
26	"	"	TEB PBI	2577	2577	LV	1/1		26	26
29	"	"	PBI TIST	2578	2578	LV			23	23
29	"	"	TIST PBI	2579	2579	LV	1/1		24	24
7 APR	"	"	PBI TEB	2580	2580	LV	1/1		27	27
8	"	"	TEB PBI	2581	2581	LV	1/1		26	26
19	"	"	PBI BED	2582	2582	LV			26	26
19	"	"	BED TEB	2583	2583	LV	1/1		25	25
20	"	"	TEB PBI	2584	2584	LV			15	15
29	"	"	PBI TEB	2585	2585	LV			44	44
30	"	"	TEB PBI			LV			276	883744
2 MAR	B-727-200	SIMULATOL	MIA MIA			LV			276	884185

CONFIDENTIAL DR 000096

FC RECORDING RAY ROBERTS
CAPT RECORDING RAY ROBERTS
JOHN ROBERTS

Bill HAMMOND CHECK RIDE

Page Total: 5/7
Amount Forward: 6509
Total to Date: 6509

Pilot's Signature: *David Redger*

Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Manuevers, Endorsements	Number of Landings	Aircraft Category...		...and Class	
			From	To					ATP/PAK	GLIDER HELICOPTER	SEL	ME
2010 MAY 6	B-727-31H	N908JE	PBI	PBI	441	2086	LV		15			
13	G-1159B	N909JE	PBI	TIST	2087	2087	BH	1/1	24			
13	"	"	TIST	PBI	2088	2088	BH	1/1	25			
20	"	"	PBI	TIB	2089	2089	LV	1/1	25			
21	"	"	TIB	PBI	2090	2090	LV		24			
31	"	"	PBI	TIST	2091	2091	LV	1/1	24			
31	"	"	TIST	PBI	2092	2092	LV		27			
31	"	"	PBI	TIB	2093	2093	LV	1/1	24			
31	"	"	TIB	PBI	2094	2094	LV		27			
31	"	"	PBI	TIST	2095	2095	LV	1/1	CONFIDENTIAL DR 000097			
31	"	"	TIST	PBI	2096	2096	LV		25			
31	"	"	PBI	TIB	2097	2097	LV	1/1	25			
31	"	"	TIB	PBI	2098	2098	LV		24			
31	"	"	PBI	TIB	2099	2099	LV	1/1	25			
31	"	"	TIB	PBI	2100	2100	LV		24			
31	"	"	PBI	TIB	2101	2101	LV	1/1	25			
31	"	"	TIB	PBI	2102	2102	LV		26			
31	"	"	PBI	TIB	2103	2103	LV	1/1	26			
31	"	"	TIB	PBI	2104	2104	LV		25			
31	"	"	PBI	TIB	2105	2105	LV	1/1	25			
31	"	"	TIB	PBI	2106	2106	LV		25			
31	"	"	PBI	TIB	2107	2107	LV	1/1	25			
31	"	"	TIB	PBI	2108	2108	LV		25			
31	"	"	PBI	TIB	2109	2109	LV	1/1	25			
31	"	"	TIB	PBI	2110	2110	LV		25			
31	"	"	PBI	TIB	2111	2111	LV	1/1	25			
31	"	"	TIB	PBI	2112	2112	LV		25			
31	"	"	PBI	TIB	2113	2113	LV	1/1	25			
31	"	"	TIB	PBI	2114	2114	LV		25			
31	"	"	PBI	TIB	2115	2115	LV	1/1	25			
31	"	"	TIB	PBI	2116	2116	LV		25			
31	"	"	PBI	TIB	2117	2117	LV	1/1	25			
31	"	"	TIB	PBI	2118	2118	LV		25			
31	"	"	PBI	TIB	2119	2119	LV	1/1	25			
31	"	"	TIB	PBI	2120	2120	LV		25			
31	"	"	PBI	TIB	2121	2121	LV	1/1	25			
31	"	"	TIB	PBI	2122	2122	LV		25			
31	"	"	PBI	TIB	2123	2123	LV	1/1	25			
31	"	"	TIB	PBI	2124	2124	LV		25			
31	"	"	PBI	TIB	2125	2125	LV	1/1	25			
31	"	"	TIB	PBI	2126	2126	LV		25			
31	"	"	PBI	TIB	2127	2127	LV	1/1	25			
31	"	"	TIB	PBI	2128	2128	LV		25			
31	"	"	PBI	TIB	2129	2129	LV	1/1	25			
31	"	"	TIB	PBI	2130	2130	LV		25			
31	"	"	PBI	TIB	2131	2131	LV	1/1	25			
31	"	"	TIB	PBI	2132	2132	LV		25			
31	"	"	PBI	TIB	2133	2133	LV	1/1	25			
31	"	"	TIB	PBI	2134	2134	LV		25			
31	"	"	PBI	TIB	2135	2135	LV	1/1	25			
31	"	"	TIB	PBI	2136	2136	LV		25			
31	"	"	PBI	TIB	2137	2137	LV	1/1	25			
31	"	"	TIB	PBI	2138	2138	LV		25			
31	"	"	PBI	TIB	2139	2139	LV	1/1	25			
31	"	"	TIB	PBI	2140	2140	LV		25			
31	"	"	PBI	TIB	2141	2141	LV	1/1	25			
31	"	"	TIB	PBI	2142	2142	LV		25			
31	"	"	PBI	TIB	2143	2143	LV	1/1	25			
31	"	"	TIB	PBI	2144	2144	LV		25			
31	"	"	PBI	TIB	2145	2145	LV	1/1	25			
31	"	"	TIB	PBI	2146	2146	LV		25			
31	"	"	PBI	TIB	2147	2147	LV	1/1	25			
31	"	"	TIB	PBI	2148	2148	LV		25			
31	"	"	PBI	TIB	2149	2149	LV	1/1	25			
31	"	"	TIB	PBI	2150	2150	LV		25			
31	"	"	PBI	TIB	2151	2151	LV	1/1	25			
31	"	"	TIB	PBI	2152	2152	LV		25			
31	"	"	PBI	TIB	2153	2153	LV	1/1	25			
31	"	"	TIB	PBI	2154	2154	LV		25			
31	"	"	PBI	TIB	2155	2155	LV	1/1	25			
31	"	"	TIB	PBI	2156	2156	LV		25			
31	"	"	PBI	TIB	2157	2157	LV	1/1	25			
31	"	"	TIB	PBI	2158	2158	LV		25			
31	"	"	PBI	TIB	2159	2159	LV	1/1	25			
31	"	"	TIB	PBI	2160	2160	LV		25			
31	"	"	PBI	TIB	2161	2161	LV	1/1	25			
31	"	"	TIB	PBI	2162	2162	LV		25			
31	"	"	PBI	TIB	2163	2163	LV	1/1	25			
31	"	"	TIB	PBI	2164	2164	LV		25			
31	"	"	PBI	TIB	2165	2165	LV	1/1	25			
31	"	"	TIB	PBI	2166	2166	LV		25			
31	"	"	PBI	TIB	2167	2167	LV	1/1	25			
31	"	"	TIB	PBI	2168	2168	LV		25			
31	"	"	PBI	TIB	2169	2169	LV	1/1	25			
31	"	"	TIB	PBI	2170	2170	LV		25			
31	"	"	PBI	TIB	2171	2171	LV	1/1	25			
31	"	"	TIB	PBI	2172	2172	LV		25			
31	"	"	PBI	TIB	2173	2173	LV	1/1	25			
31	"	"	TIB	PBI	2174	2174	LV		25			
31	"	"	PBI	TIB	2175	2175	LV	1/1	25			
31	"	"	TIB	PBI	2176	2176	LV		25			
31	"	"	PBI	TIB	2177	2177	LV	1/1	25			
31	"	"	TIB	PBI	2178	2178	LV		25			
31	"	"	PBI	TIB	2179	2179	LV	1/1	25			
31	"	"	TIB	PBI	2180	2180	LV		25			
31	"	"	PBI	TIB	2181	2181	LV	1/1	25			
31	"	"	TIB	PBI	2182	2182	LV		25			
31	"	"	PBI	TIB	2183	2183	LV	1/1	25			
31	"	"	TIB	PBI	2184	2184	LV		25			
31	"	"	PBI	TIB	2185	2185	LV	1/1	25			
31	"	"	TIB	PBI	2186	2186	LV		25			
31	"	"	PBI	TIB	2187	2187	LV	1/1	25			
31	"	"	TIB	PBI	2188	2188	LV		25			
31	"	"	PBI	TIB	2189	2189	LV	1/1	25			
31	"	"	TIB	PBI	2190	2190	LV		25			
31	"	"	PBI	TIB	2191	2191	LV	1/1	25			
31	"	"	TIB	PBI	2192	2192	LV		25			
31	"	"	PBI	TIB	2193	2193	LV	1/1	25			
31	"	"	TIB	PBI	2194	2194	LV		25			
31	"	"	PBI	TIB	2195	2195	LV	1/1	25			
31	"	"	TIB	PBI	2196	2196	LV		25			
31	"	"	PBI	TIB	2197	2197	LV	1/1	25			
31	"	"	TIB	PBI	2198	2198	LV		25			
31	"	"	PBI	TIB	2199	2199	LV	1/1	25			
31	"	"	TIB	PBI	2200	2200	LV		25			
31	"	"	PBI	TIB	2201	2201	LV	1/1	25			
31	"	"	TIB	PBI	2202	2202	LV		25			
31	"	"	PBI	TIB	2203	2203	LV	1/1	25			
31	"	"	TIB	PBI	2204	2204	LV		25			
31	"	"	PBI	TIB	2205	2205	LV	1/1	25			
31	"	"	TIB	PBI	2206	2206	LV		25			
31	"	"	PBI	TIB	2207	2207	LV	1/1	25			
31	"	"	TIB	PBI	2208	2208	LV		25			
31	"	"	PBI	TIB	2209	2209	LV	1/1	25			
31	"	"	TIB	PBI	2210	2210	LV		25			
31	"	"	PBI	TIB	2211	2211	LV	1/1	25			
31	"	"	TIB	PBI	2212	2212	LV		25			
31	"	"	PBI	TIB	2213	2213	LV	1/1	25			
31	"	"	TIB	PBI	2214	2214	LV		25			
31	"	"	PBI	TIB	2215	2215	LV	1/1	25			
31	"	"	TIB	PBI	2216	2216	LV		25			
31	"	"	PBI	TIB	2217	2217	LV	1/1	25			
31	"	"	TIB	PBI	2218	2218	LV		25			
31	"	"	PBI	TIB	2219	2219	LV	1/1	25			
31	"	"	TIB	PBI	2220	2220	LV		25			
31	"	"	PBI	TIB	2221	2221	LV	1/1	25			
31	"	"	TIB	PBI	2222	2222	LV		25			
31	"	"	PBI	TIB	2223	2223	LV	1/1	25			
31	"	"	TIB	PBI	2224	2224	LV		25			
31	"	"	PBI	TIB	2225	2225	LV	1/1	25			
31	"	"	TIB	PBI	2226	2226	LV		25			
31	"	"	PBI	TIB	2							

Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...			...and Class		HS-12 COPY LANDINGS
			From	To					PLANE	GLIDER	HELICOPTER	SEL	MEL	
2010														
JUL 16	AG-1159B	N909JE	TIST	BCT	2107		LV		26				26	
20	"	"	BCT	TEB	2108		LV		24				24	
25	"	"	TEB	LFPB	2109		LV		72				72	
AUG 2	"	"	LFPB	CYQX	2110		LV	1/1	57				57	
2	"	"	CYQX	TEB	2110		LV	1/1	28				28	
25	"	"	TEB	PHX	2116		LV	1/1	47				47	
25	"	"	PHX	ABQ	2117		LV	1/1	9				9	
30	"	"	ABQ	TEB	2118		LV		38				38	
SEP 2	"	"	TEB	TIST	2119		LV	1/1	37				37	
12	"	"	TIST	BED	2120		LV		40				40	
12	"	"	BED	TEB	2121		LV		10				10	
19	"	"	TEB	TIST	2122		LV	1/1	37				37	
21	"	"	TIST	TEB	2123	NADIA MARCEUKOVA FLEW IN THE RIGHT SEAT, I SAT ON JUMPSEAT	LV		0				0	
26	"	"	TEB	EGGP	2124	DIVERTED TO ALBUQUERQUE	LV	1/1	65				65	
27	"	"	EGGP	EGGW	2125		LV	1/1	7				7	
29	"	"	EGGW	LFPB	2126		LV		11				11	
OCT 10	"	"	LFPB	EGGW	2127	DIVERTED TO EGGW BEFORE ENTERING TRACKS, CRACKED DV WINDOW	LV	1/1	28				28	
19	"	"	EGGW	BGR	2128	EMPTY	LV		68				68	
19	"	"	BGR	TEB	2129	EMPTY	LV		14				14	
I certify that the statements made by me on this form are true.								Page Total	816	618			618	
Pilot's Signature <i>David Rodgers</i>								Amount Forward	6923	6519	10408	33173	8	2176884640517
								Total to Date	6923	6519	107026	33173	8	2176885258517
									6525					

David Rodgers

Instructions

Master Copy

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles From	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		...and Class	
			From	To					ADAPLANC	GUERON	HELIOPTR	SEL
2011 Feb 13	G-1159B	N909JE	BEB	PBI		2144			27			27
16	"	"	PBI	TIST		2145			24			24
18	S-76C++	N722JE	TIST	LSJ					3			3
19	"	"	LSJ	TISK					3			3
19	"	"	TISK	LSJ					3			3
19	"	"	LSJ	TIST					1			1
20	"	"	TIST	LSJ					1			1
20	"	"	LSJ	TIST					1			1
20	G-1159B	N909JE	TIST	TGB		2146		✓	42			42
26	"	"	TGB	ABQ		2147			50			50
Mar 1	"	"	ABQ	LGB		2148		1/1	100	CONFIDENTIAL DR 000100		100
4	"	"	LGB	ABQ		2149			16			16
10	"	"	ABQ	CPS		2150		1/1	22			22
26	"	"	CPS	TGB		2151			18			18
26	"	"	TGB	TIST		2152			34			34
27	"	"	TIST	MDPC		2153		1/1	8			8
27	"	"	MDPC	TIST		2154		1/1	8			8
27	"	"	TIST	MDPC		2155		1/1	9			9
28	"	"	MDPC	TIST		2164			9			9
								Pago Total	286			28
								Amount Forward	16754	9	3	2176
								Total to Date	16783	5	3	2176
												8578
												8666

I certify that the statements made by me on this form are true.

Pilot's Signature
Daniel Rodriguez

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		...and Class	
			From	To					ATPL/PL	GA/GE	SEL	MEL
2011	G-1159B	N909JE	TIST	TEB	2157	2157	LV	1/	41		SEL	MEL
29	S-76C-4	N722JE	TEB	4N1			LV					41
30	"	"	4N1	TEB			LV					
30	"	"	TEB	POV			LV					
30	B-727-200	SPM147M	SFB	SFB			LV					
13	"	"	"	"			LV					
13	"	"	"	"			LV					
14	"	"	"	"			LV					
14	"	"	"	"			LV					
26	B-727-314	N908JE	PBT	BQK			LV					
30	G-1159B	N909JE	TIST	TEB	2159	2159	LV	1/1	38	CONFIDENTIAL DR_000101		
14	"	"	TEB	LFPB	2160	2160	LV	1/1	74			
16	"	"	LFPB	GOPY	2161	2161	LV	1/1	63			
20	"	"	GOPY	GVAC	2162	2162	LV		12			
20	"	"	GVAC	TIST	2163	2163	LV		64			
22	"	"	TIST	TEB	2164	2164	LV	1/1	41			
26	BHT-407	N491GM	PBT-FUS-PBT				LV					
8	"	"	PBT-LNB-PBT				LV					
26	G-1159B	N909JE	TIST	TEB	2166	2166	LV	1/1	40			
30	"	"	TEB	PBT	2167	2167	LV		24			
I certify that the statements made by me on this form are true.												
Pilot's Signature												
David Lodge												
Page Total								5/4	489	44		
Amount Forward								6450	10703	33	175	0
Total to Date								6450	10703	33	175	0
								6454	10707	33	179	4

Date

Front

suojonjstul

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	SEL	MEL	HELI	Condition
2011	G-1159B	N909JE	PBI TEB	2148	2148	LV	1/1	24	24	24	24	XC
9	"	"	TEB ASE	2149	2149	LV		39	39	39	39	2
9	"	"	ASE ABQ	2170	2170	LV		12	12	12	12	3
14	"	"	ABQ BFI	2171	2171	LV	1/1	20	20	20	20	1
15	"	"	BFI APC	2172	2172	LV		16	16	16	16	2
17	"	"	APC TEB	2173	2173	LV	/	51	51	51	51	1
19	"	"	TEB TIST	2174	2174	LV		35	35	35	35	5
20	"	"	TIST TEB	2175	2175	LV	1/1	40	40	40	40	3
25	B-727-200	SIMULATOR	MIA MIA					20	20	20	20	4
25	"	"	"			CAPTAIN WARMUP HOLDING		20	20	20	20	CONFIDENTIAL DR 2000102
26	"	"	"			FG WARMUP		10	10	10	10	
26	"	"	"			CAPTAIN CHECK RIDE PART 125 HARRY BROWN - GYM INER HOGDOR		10	10	10	10	
28	G-1159B	N909JE	TEB PBI	2176	2176	3 GPT OR SUPP SEAT		0	0	0	0	
28	"	"	PBI PBI	2177	2177	3 GPT TAKE OFF + LANDINGS FOR NADOB MORE IN KY FROM THE LEFT FOOT	3/3	11	11	11	11	1
30	B-727-31H	N908JE	BQK PBI	494	494	LV	1/1	11	11	11	11	1
31	BHT-407	N491GM	TIST LST			LV		3	3	3	3	1
31	"	"	LST LST			LV		7	7	7	7	1
31	G-1159B	N909JE	SWF TIST	2180	2180	LV NM	1/1	39	39	39	39	3
13	"	"	TEB TIST	2182	2182	LV	1/1	38	38	38	38	3
Page Total							9/8	404	404	404	404	9
Amount Forward							655	108324	108324	108324	108324	536
Total to Date							6552	108728	108728	108728	108728	545

I certify that the statements made by me on this form are true.

Pilot's Signature

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category	SEL	MEL	1962-1969-60 Logbook
2011 Nov 21	B-727-200	B19085E	MIA			F65HECK RIDE PAKS 125 LV		10		10	
25 Dec 1	"	"	"			CAPTAIN PC KEY BIRKLAND HAWK		20		20	
3	B-727-31H	N9085E	PBI		495	RUSA TEST FLIGHTS		16		16	
13	"	"	PBI		496	DEMO FLIGHT FOR	1/1	11		11	
2012 Jan 8	G-1159B	N909JE	TEB		497	MAINTENANCE	1/1	9		9	
8	"	"	MHT		2193		1/1	9		9	
16	"	"	LFPB		2194		1/1	61		61	
17	"	"	GMMX		2195		1/1	30		30	
18	"	"	DIAP		2196		1/1	42		42	
18	"	"	GVAC		2197		1/1	36		36	
23	BHT-467	N491GM	LSJ		2198			71		71	
24 Feb 12	G-1159B	N909JE	TIST		2199	FMS APPROXIMATES GAS HOLE - CANO WK STALLS, NO SUP LANDING, HOLDING		29		29	
13	G-1159A	SEMIANAL	DFW			HIGH ALTITUDE OPERATIONS, CHANGING DESIGNS, RTO, ED LANEY-GREEN CO		30		30	
Mar 6	B-727-31H	N9085E	VQR		498	LV		20		20	
6	"	"	VQR		499	JFM BORTXON		5		5	
16	"	"	PBI		500	LV		9		9	
17	"	"	JFK			JB		24		24	
			LFPB			JB		75		75	
Page Total							3/4	507		507	1
Amount Forward							6944	10872	33	100	545
Total to Date							6467	10923	5	33	1006
							6556				

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodriquez

suojonjisu

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miss Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category		...and Class		Helix
			From	To					AT/FLY	GL/DEF	SEG	MEL	
2012 MAR 19	B-727-311H	N908JE	LFPB	EGHL		501	LASHAM	1/1	1	0		10	
APR 18	G-1159B	N909JE	TEB	TIST		1207	LV		37			37	
30 MAR	B-727-200	STIMULATOR	MIA	MIA			WARM UP AS CAPTAIN AND LV ENGINEER HOLDING CAPTAIN PC HOLDING HARRIS BROWN-GRANDSUCH		40			40	
3	G-1159B	N909JE	TIST	PBI		2208	LV		27			27	
4	"	"	PBI	TEB		2209	LV	1/1	25			25	
JUL 8	"	"	TEB	TIST		2212	LV		35			35	
20	"	"	TIST	TIST		2213	LV	3/3	2			2	
21	"	"	TIST	TEB		2214	LV	1/1	30			30	
26	"	"	TEB	PBI		2215	LV		24			24	
30	"	"	PBI	CNW		2216	LV	1/1	24			24	
30 AUG 15	"	"	CNW	ABQ		2217	LV	1/1	15			15	
6	"	"	ABQ	SFO		2218	LV		23			23	
18	"	"	SFO	ABQ		2219	LV		21			21	
22	"	"	ABQ	TEB		2220	LV		36			36	
22	"	"	TEB	IAD		2221	LV	1/1	9			9	
22	"	"	IAD	PBI		2222	LV	1/1	23			23	
26	"	"	PBI	TIST		2223	LV		26			26	
508	"	"	TIST	TEB		2224	LV	1/1	38			38	
CONFIDENTIAL DR_000104									49			49	
Page Total								11/9	49			49	
Amount Forward								6967	10123	5		33	1806
Total to Date								6978	10972	8		33	1806

I certify that the statements made by me on this form are true.

Pilot's Signature

David Lodge

Instructions

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...	SEL	MEL	
			From To					ALP, PL, GL, ID, etc.			
2012	G-1159B	N909JE	TEB ABQ		2225		LV	411		4	
13	"	"	ABQ ONT		2226		LV	16		1	
18	"	"	ONT TEB		2227		LV	48		4	
28	"	"	TEB PBI		2228		LV	25		2	
Oct 1	"	"	PBI TIST		2229		LV	26		2	
6	"	"	TIST TEB		2230		LV	37		3	
24	B-727-31H	N908JE	EGHL TEB		502	LASHAM TO STANBURY	LV	7		3	
28	G-1159B	N909JE	TEB TIST		2231		LV	39		3	
Nov 12	B-727-200	SEMOLAPOL	MTB MIA			FE PC MARCELLO MARSHALL	LV	20		2	
12	"	"	" "			CAPTAIN PC HOLDING	LV	20		2	
20	G-1159B	N909JE	TEB PBI		2235	STANBURY BROWN	LV	20		2	
25	"	"	PBI MPW		2236		LV	20		2	
26	"	"	MPW TEB		2237		LV	16		2	
Dec 6	B-727-31H	N908JE	EGSS EGSS		503		LV	7		1	
7	"	"	EGSS JFK		504		LV	82		1	
14	"	"	JFK TIST		505		LV	37		1	
2013	"	"	TIST PBI		506		LV	28		1	
Jan 10	G-1159B	N909JE	TEB PBI		2239		LV	29		2	
17	"	"	PBI TEB		2240		LV	27		2	
21	"	"	TEB PBI				LV	27		2	
Page Total							6/4	558		5	
Amount Forward							6910	10912	8	33180	6
Total to Date							6984	11028	6	33180	6

I certify that the statements made by me on this form are true.

Pilot's Signature

David Rodriguez

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Manoeuvres, Endorsements	Number of Landings	Aircraft Category...		...and Class
			From	To					AERONAUTICAL	GLIDER	
2013 FEB 7	B-727-314	N908JE	PBI	BQK		307	LV CH JOE KENNEDY	1/1	1	1	SEL 1
13	G-1159A	SEMI-ANALOG	DFW	DFW				3/3	2	0	
14	"	"	"	"				1/1	2	0	
16	G-1159B	N909JE	TEB	PBI		2245	LV	1/1	3	0	
18	"	"	PBI	TEB		2246	LV	1/1	2	0	
22	"	"	TEB	ABQ		2247	LV	1/1	4	9	
24	"	"	ABQ	LGB		2248	LV	1/1	1	7	
26	"	"	LGB	TEB		2249	LV	1/1	4	8	
26	"	"	TEB	PBI		2250	BILL GATES	1/1	2	5	
19	"	"	TIST	TEB		2252	LV	1/1	4	2	
21	"	"	TEB	TIST		2256	LV	1/1	3	6	
21	"	"	TIST	TEB		2257	LV	1/1	CONFIDENTIAL	DR_000108	
25	"	"	TEB	ASE		2258	LV	1/1	4	3	
25	"	"	ASE	ABQ		2259	LV	1/1	1	0	
25	"	"	ABQ	TUL		2260	LV	1/1	1	3	
29	"	"	TUL	VNY		2261	LV	1/1	3	0	
30	"	"	VNY	TEB		2262	LV	1/1	4	9	
12	"	"	TEB	TIST		2263	LV	1/1	3	8	
12	"	"	TIST	PBI		2264	LV	1/1	2	7	
I certify that the statements made by me on this form are true.											
Pilot's Signature											
2176 8											
2176 8											

Pilot's Signature

David Rodriguez

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					PLANE	GLIDER	HELICOPTER
2013 MAY 15	G-1159B	N909JE	PBI	TIST	2265		LV		23		
22	"	"	TIST	ISP	2266		DARREN ROTHBELL	1/1	36		
24	"	"	ISP	TEB	2267		LV	1/1	8		
24	"	"	TEB	TIST	2268		LV	1/1	37		
JUN 3	"	"	TIST	ISP	2269		LV		39		
6	"	"	ISP	LFPB	2270		LV	1/1	70		
15	"	"	LFPB	LPAZ	2271		LV		39		
16	"	"	LPAZ	TIST	2272		LV		56		
24	"	"	TIST	TEB	2273		LV	1/1	39		
JUL 17	"	"	TIST	TEB	2276		BENJAMIN DIMAURO	1/1	38		
19	"	"	TEB	BED	2277		LV		9		
19	"	"	BED	TIST	2278		LV		3	CONFIDENTIAL DR	000107
25	"	"	TIST	PBI	2279		LV	1/1	26		
26	"	"	PBI	TEB	2280		LV		25		
AUG 1	"	"	TEB	ABQ	2281		BENJAMIN DIMAURO	1/1	42		
3	"	"	ABQ	LAS	2282		BD	1/1	13		
4	"	"	LAS	ABQ	2283		BD	1/1	14		
7	"	"	ABQ	ASE	2284		BD	1/1	11		
7	"	"	ASE	BFI	2285		BD	1/1	22		

I certify that the statements made by me on this form are true.

Pilot's Signature

Darren Rothbell

Page Total	16/11	584			
Amount Forward	6998	110860	33	180	6
Total to Date	7009	111444	4	33	1806

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		23		
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		3	CONFIDENTIAL DR	000107
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		14		
		11		
		22		
		584		

2176 8 890
2176 8 896

EXHIBIT CC

Confidential

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 3, 2016
9:07 a.m.

C O N F I D E N T I A L

Deposition of DAVID RODGERS, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

Confidential

Page 2

2

3 A P P E A R A N C E S:

4 BOIES SCHILLER & FLEXNER, LLP
Attorneys for Plaintiff

5 401 East Las Olas Boulevard
Fort Lauderdale, Florida 33301

6 BY: BRADLEY EDWARDS, ESQ.

7

8 HADDON MORGAN & FOREMAN, P.C.
Attorneys for Defendant

9 150 East 10th Avenue
Denver, Colorado 80203

10 BY: JEFFREY PAGLIUCA, ESQ.

11

12

13 ALSO PRESENT: Sandy Perkins, Paralegal
Boies Schiller & Flexner

14

Ryan Kick, Videographer

15

16

17

18

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Confidential

Page 3

2

3

I N D E X

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6

7

8

E X H I B I T S

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	Equus Global Aviation offering	

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Page 6

1 DAVID RODGERS

2 A. Yes.

3 Q. Can you -- can you tell me -- I have been
4 provided by your attorney a -- what has been
5 represented to be a copy, a direct copy of that
6 logbook. And I'm going to mark this as
7 Plaintiff's 1. I just want you to confirm that this
8 is an accurate copy of the original logbook that you
9 brought to your deposition today.

10 A. Yes.

11 MR. REINHART: Let him show it to you.

12 BY MR. EDWARDS:

13 Q. There you go.

14 (The referred-to document was marked by
15 the court reporter for Identification as
16 Deposition Exhibit 1.)

17 MR. REINHART: It is not a copy of the
18 entire book. It is the time period that was
19 covered by the subpoena. I just want to make
20 clear the book covers the time period outside
21 the subpoena.

22 MR. EDWARDS: Okay. I will let him
23 clarify that, of course, too.

24 THE WITNESS: Yes. It is logbook. It is
25 not 40 years, but it is my logbook.

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Page 7

1 DAVID RODGERS

2 BY MR. EDWARDS:

3 Q. Okay. You can keep this -- that down
4 there --

5 A. Okay.

6 Q. -- so we can keep track of the exhibits.

7 A. Okay.

8 Q. So does the copy that you just went
9 through, is that an exact copy of the original
10 logbook from the November 1995 date through, it
11 looks like, September 2013? That period of time?

12 A. Yes.

13 Q. Okay. And what is this book? What do you
14 call the book?

15 A. It is called the standard pilot master
16 log.

17 Q. All right. And who made the various
18 entries in the book?

19 A. I did.

20 Q. When did you make --

21 MR. PAGLIUCA: Brad, can you hang on for
22 one second.

23 MR. EDWARDS: Sure.

24 MR. PAGLIUCA: You said September 2013, I
25 thought.

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Page 8

1 DAVID RODGERS

2 MR. EDWARDS: That is what I have on the
3 last page.

4 MR. PAGLIUCA: My last page is 2008 on
5 this copy, 093 Bates label.

6 MR. REINHART: There's 108 pages to the
7 exhibit.

8 MR. PAGLIUCA: I'm missing the last 8
9 pages. That is why.

10 MS. PERKINS: Do you want the last copy?
11 What is your last page?

12 MR. PAGLIUCA: Ninety-three is my last
13 page.

14 That is why I only go through '08.

15 MS. PERKINS: So I will give you my '94 to
16 the end. That should give you a complete. Oh,
17 you're looking -- which one are you looking at,
18 the new one or the old one?

19 MR. EDWARDS: The one through '08.

20 MR. PAGLIUCA: Okay.

21 MR. EDWARDS: Okay. Are you ready, Jeff?

22 MR. PAGLIUCA: Yes.

23 BY MR. EDWARDS:

24 Q. When did you make each individual entry?

25 A. It could have been on that date that it

Confidential

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1 DAVID RODGERS

2 says. It could have been possibly a later date.

3 Most likely, fairly close to that date.

4 Q. Okay. How did you make sure that the log
5 entries that you were creating were accurate?

6 A. Well, people get on the airplane and I see
7 who the people are, and I put them down there.

8 Q. Okay. So you are making the notation at
9 or around the time that you are making this
10 observation -- the observations?

11 A. Correct.

12 Q. And you are recording the data accurately
13 in your logbook?

14 A. As accurately as I can.

15 Q. Okay.

16 A. Yes.

17 Q. Can we just look at the first page of the
18 exhibit?

19 A. Uh-huh.

20 Q. And if you could walk me through, let's
21 just take the first line.

22 A. Uh-huh.

23 Q. In the top left corner, there is a date.

24 A. Correct.

25 Q. And it says, "NOV '95." Is that you

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1 DAVID RODGERS

2 indicating that this is November 1995?

3 A. Yes.

4 Q. Okay. And the first line under that in
5 the date column says 17. Is that November 17th,
6 1995?

7 A. Yes.

8 Q. Is that a notation that you would have
9 made on November 17th, 1995?

10 A. Yes.

11 Q. And the next column over under "aircraft
12 make and model," there is a number there. What is
13 that number?

14 A. That's the model of aircraft we're flying.
15 It's a G-1159B. It is Gulfstream, II-B aircraft.

16 Q. Okay. And then the next column over,
17 aircraft identification mark?

18 A. It is the registration number of the
19 aircraft.

20 Q. And what is the registration number? What
21 does that mean?

22 A. The number that is on the side of every
23 aircraft to identify what country it is from and
24 what particular airplane it is in that country. The
25 N means United States.

Confidential

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1 DAVID RODGERS

2 Q. And is that number unique to the aircraft?

3 A. Yes.

4 Q. So there is no other aircraft at the same
5 time bearing the identification number in N908JE?

6 A. That's correct.

7 Q. Who picks the identification number? I
8 understand N means United States.

9 A. Right.

10 Q. Who picks the 908JE?

11 A. It depends -- some aircraft, I mean, when
12 you get them, they already have the number on there,
13 and so that would be one way. Sometimes the
14 manufacturer puts them on there.

15 You can also request a certain number, if
16 you so chose to do so.

17 Q. Okay. The particular air -- these
18 particular logs were produced in a -- as a
19 consequence of a subpoena issued in the case of
20 Virginia Roberts Giuffre versus Ghislaine Maxwell.

21 A. Uh-huh.

22 Q. Is that your understanding?

23 A. Yes.

24 Q. And the period of time that we were
25 produced -- I understand you have flown for 40

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1 DAVID RODGERS

2 years. The period of time -- or that is evidenced
3 by this logbook is '95 through 2013.

4 Why was it that period of time that was
5 chosen?

6 A. Because that is what the subpoena
7 requested.

8 Q. Okay. Is that when you started flying for
9 Jeffrey Epstein?

10 A. No.

11 Q. When did you start flying for Jeffrey
12 Epstein?

13 A. July of 1991.

14 Q. Okay. Do you have available today the
15 entries going back as far as July 1991?

16 A. I don't know. I have to look and see.

17 Q. Okay.

18 A. No. Because this is from 7/28 of '94.

19 Q. Okay. So that particular logbook begins
20 July 28th, 1994?

21 A. Yes.

22 Q. And were you privately flying for Jeffrey
23 Epstein on November 17th, 1995?

24 A. Yes.

25 Q. And is that Gulfstream that you described

Confidential

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1 DAVID RODGERS

2 a Jeffrey Epstein owned or controlled airplane?

3 A. It was -- let me think.

4 This was 908 Juliet, Echo -- I believe it
5 was owned by Hyperion Air, Inc., I believe.

6 Q. And is Hyperion Air, to your
7 understanding, a company associated with Jeffrey
8 Epstein?

9 A. As far as I know. I mean, I would assume
10 so, but --

11 Q. Was Jeffrey Epstein your primary
12 passenger --

13 A. Yes.

14 Q. -- on that airplane?

15 A. Yes.

16 Q. And who was the individual that gave you
17 direction as to what passengers to let on and off
18 the airplane and where to fly, et cetera?

19 A. Well, Jeffrey was usually -- I mean,
20 almost always on the airplane, unless we were going
21 to maintenance. And so when he got there, he would
22 have the people with him.

23 Q. Okay. So going back to the aircraft
24 identification mark, 908JE, does the JE signify the
25 initials of Jeffrey Epstein?

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1 DAVID RODGERS

2 A. I would assume so.

3 Q. Okay.

4 A. But technically they are actually the
5 phonetic letters that we use. But technically it is
6 Juliet echo; it is not Jeffrey Epstein. As far as
7 radio phraseology, we don't answer Jeffrey Epstein;
8 we answer Juliet.

9 Q. Okay. But the JE doesn't signify some
10 jurisdictional code?

11 A. No.

12 Q. It is -- it is chosen by the owner of the
13 aircraft?

14 A. Right. Right.

15 Q. So as his pilot and as Jeffrey Epstein
16 being the main passenger, you have presumed that JE
17 signifies his initials?

18 A. I would assume so.

19 Q. In fact, we will get to it later down the
20 road, but the -- the other plane also bears the
21 ending initials JE; is that right?

22 A. Yes.

23 And this N number that's on this airplane
24 was eventually switched to another airplane.

25 Q. To the Boeing?

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1 DAVID RODGERS

2 A. To the Boeing, correct.

3 Q. Okay.

4 So if we go back to this first entry, the
5 next column says, "From CMH."

6 A. Yes.

7 Q. And what is that?

8 A. Columbus, Ohio.

9 Q. That is an airport code?

10 A. Airport identifier.

11 Q. And, again, that airport code is unique to
12 a particular airport?

13 A. Correct.

14 Q. The next is "To PBI"?

15 A. Yes.

16 Q. Where is that?

17 A. West Palm Beach.

18 Q. And flight number? The next column says
19 "Miles Flown."

20 A. Right.

21 Q. That is not something that you log.

22 A. I don't.

23 Q. You kept pretty meticulous logs.

24 So the next column is flight log -- or
25 flight number?

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1 DAVID RODGERS

2 Q. Okay.

3 A. But I'm not even sure we still had it at
4 this point in time.

5 Q. Yeah. It shows up on the next page. We
6 will get there.

7 A. Does it? Okay.

8 So then, yes, the answer is, yeah, we
9 still had the airplane. But we wouldn't have used
10 that.

11 Q. So is there any way of telling how Jeffrey
12 Epstein, Ghislaine Maxwell, Adam Perry Lang, and
13 Virginia were in the Virgin Islands on that, from
14 December 14th, 2000 --

15 MR. PAGLIUCA: Object to foundation.

16 BY MR. EDWARDS:

17 Q. -- based on your knowledge or your logs or
18 anything else?

19 A. No, I wouldn't have any way of knowing.

20 Q. Okay.

21 A. Because the next flight that they are on
22 was like this Palm Beach one, January 16th. So I
23 wouldn't have any idea.

24 Q. Okay. To your knowledge, did Jeffrey
25 Epstein ever fly commercially?

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1 DAVID RODGERS

2 A. He probably has. Back then at this time,
3 I'm going to say probably not. But I know that he
4 has flown commercially. But usually that would be
5 like going to Europe, maybe.

6 Q. Okay. January 16th through the 25th,
7 those flights, do you see that block that I'm
8 talking about?

9 A. Yes.

10 Q. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, and then at times Shelly Lewis, do you see
12 that?

13 A. Yes, right.

14 Q. The 25th it lands in Teterboro. And the
15 next day, on the 26th, leaves out of Teterboro with
16 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and
17 Virginia Roberts. This time you wrote the whole
18 name.

19 A. Right. Right.

20 Q. So when you write the full name, does that
21 signify -- that's when you may have learned her last
22 name?

23 A. Correct.

24 Q. And do you know how she -- how she got up
25 to New Jersey or New York?

Confidential

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1 DAVID RODGERS

2 Boeing?

3 A. Yes.

4 Q. The Boeing, was that previously owned by
5 The Limited or Les Wexner?

6 A. I'm not sure of the company name,
7 officially. But probably, yes.

8 Q. Some association with him?

9 A. Some association, yes.

10 Q. Do you know who flew the Gulfstream while
11 you were doing the simulator?

12 A. Well, it would have been Larry Visoski,
13 I'm not sure who the first officer was.

14 Q. Do you know if any logs were kept of the
15 passengers' names?

16 A. While I was at school?

17 Q. Right, while you were at school.

18 A. There probably were logs, but I don't know
19 where they are.

20 Q. Have you ever spoken with Larry about
21 whether he kept names of passengers?

22 A. I don't think he does.

23 Q. Do you know where Larry Visoski flew the
24 Gulfstream for the month that you were --

25 A. No.

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1 DAVID RODGERS

2 different, because one day is the 5th; one day is
3 the 6th. But we landed there like at 11:50 at
4 night. And then when we took off, it was, you know,
5 the next day.

6 Q. Okay. Got it.

7 And then where do you go the next day?

8 A. We went from Stephenville to
9 Paris-Le Bourget.

10 Q. And who were the passengers going to
11 Paris?

12 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
13 Tayler, and Virginia Roberts.

14 Q. And then what's the next flight?

15 A. On the 8th, from Paris to -- I believe
16 that is in Spain.

17 Q. Granada, Spain?

18 A. Granada, Spain. Correct.

19 Q. Okay. And who are the passengers on that
20 trip?

21 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
22 Tayler, Virginia Roberts, Alberto and Linda Pinto,
23 one female, and Ricardo, it looks like Orieta.

24 Q. And then what's the next flight?

25 A. From there to Tangiers. From Granada to

Confidential

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1 DAVID RODGERS

2 CERTIFICATE OF OATH

3 STATE OF FLORIDA)

4 COUNTY OF MIAMI-DADE)

5
 6 I, the undersigned authority, certify
 7 that DAVID RODGERS personally appeared before
 8 me and was duly sworn.

9 WITNESS my hand and official seal
 10 this 8th day of June, 2016.

11 Kelli Ann Willis, RPR, CRR
 12 Notary Public, State of Florida
 13 Commission FF928291, Expires 2-16-20
 14 + + + + + + + + + + + + + + + +

15 CERTIFICATE

16 STATE OF FLORIDA)

17 COUNTY OF MIAMI-DADE)

18 I, Kelli Ann Willis, Registered
 19 Professional Reporter and Certified Realtime
 20 Reporter do hereby certify that I was
 21 authorized to and did stenographically report the
 22 foregoing deposition of DAVID RODGERS; that a
 23 review of the transcript was not requested; and
 24 that the transcript is a true record of my
 25 stenographic notes.

I FURTHER CERTIFY that I am not a
 relative, employee, attorney, or counsel of any
 of the parties, nor am I a relative or employee of
 any of the parties' attorney or counsel connected
 with the action, nor am I financially interested
 in the action.

Dated this 8th day of June, 2016.

23

24 KELLI ANN WILLIS, RPR, CRR

25

EXHIBIT DD

**INTENTIONALLY
LEFT BLANK**

EXHIBIT EE

 Date: 4/25/16 ROYAL PALM BEACH POLICE DEPARTMENT Page: 1
 Time: 8:51:56 Citation Tracking Report Program: CMS307L

Case Number : 1-02-009702
 Issued By : KLOEPPING, KURT 6/19/02 13:55
 Entry Employee : STEPNOWSKI, DOROTHY 6/24/02 13:55
 Zone/Division : Zone Two (2) (So of Okee/E thr Wil)
 District : PATROL
 Street Name : CRESTWOOD BL /SPARROW
 Last Name : ROBERTS, VIRGINIA LEE
 Street Number : [REDACTED] RD
 City : LOXAHATCHEE, FL 33470
 Birth Date : [REDACTED]
 Race : White Oper Lic No. : [REDACTED]
 Sex : Female

***** VEHICLE INFORMATION # 1 *****
 Case Number : 1-02-009702 License Number : G13BTQ FL
 Vehicle Year : 1993 Make : PONTIAC
 Style : TWO DOOR Color - Top : White
 Color - Bottom : White

***** VIOLATION INFORMATION # 1 *****
 Case Number : 1-02-009702 Citation Number: 9702BOE5
 Statute/Ordin : 316.189 1 ????? : NA

***** END OF REPORT *****

CERTIFIED
 TO BE A TRUE COPY
 RIC L. BRADSHAW, SHERIFF

GM_00776

EXHIBIT FF

OBT Number		PROBABLE CAUSE AFFIDAVIT		1. Request for Warrant 2. N.T.A.		3. Request for Warrant 4. Request for Capias		Juvenile	
Agency ORI Number FLO 5 0 0 0 0 0		Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE		Agency Report Number 0 6 1 0 3 1 0 9 4 4 8 8					
Charge Type: Check as many as apply.		1. Felony 2. Traffic Felony		3. Misdemeanor 4. Traffic Misdemeanor		5. Ordinance 6. Other		Special Notes:	
Name (Last, First, Middle) Figueroa, Anthony		Alias		Race W M		Sex M			
Charge Description Grand Theft 812.014 (281)		Charge Description		Charge Description		Charge Description			
Victim's Name (Last, First, Middle) Holliswood Video		Local Address (Street, Apt. Number) 13920 Wellington Tr Wellington, FL 33414		City (City) Wellington		State (State) FL		Zip (Zip) 33414	
Business Address (Name, Street) Same		City (City) Wellington		State (State) FL		Zip (Zip) 33414		Phone (Phone) 339-1520	
Address Source Uct/Comp		Occupation Same		Date of Birth N/A					
<p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.</p> <p><input type="checkbox"/> committed the below acts in my presence.</p> <p><input type="checkbox"/> confessed to _____</p> <p><input checked="" type="checkbox"/> was observed by David Angellom who told me that he/she saw the arrested person commit the below acts.</p> <p><input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p>									
<p>On the _____ day of _____ 20____ at _____ A.M. P.M. (Specifically include facts constituting cause for arrest.)</p> <p>On 8-15-02 a report was received by Deputy Comargo #2178 ref to a Grand Theft Case that occurred at Holliswood Video located at 13920 Wellington Tr in Wellington, FL on 8-11-02. The Store Manager Philip Napuli advised that on 8-11-02 it was found that 18 video games had been stolen out of their box and the boxes left on the shelf. It was found that the suspect had come into the store while it was open to the public and had cut the side of the game box with a sharp object and took the game out of the box leaving the box on the shelf. Mr. Napuli advised that the suspect was captured on the surveillance camera and he had the video on 7-30-02. The suspect had dark hair and was wearing a long shirt and a long pants. He observed this person pick up the game off the shelf place the tape under his shirt, then use force placing the game in his pants.</p>									
<p>STATE OF FLORIDA COUNTY OF PALM BEACH</p> <p><i>David Angellom</i> 3483 (Signature of Arresting/Investigative Officer)</p> <p><i>David Angellom</i> 3483 12th day of Sept 2002 by <i>David Smith Jr</i> (Print Name of Arresting/Investigative Officer, who is personally known to me and/or produced identification. Type of identification produced: Personally known)</p> <p><i>David A. Bileman</i> 6336 1/5 Jan 2002 by <i>David Smith Jr</i> (Notary Public, Clerk of Court, Officer (F.S. 117.10))</p>									
<p>DISTRIBUTION: WHITE — Court Copy GREEN — State Attorney YELLOW — Agency PINK — Agency</p>									

GM_01202 PAGE

OF

OBT Number		PROBABLE CAUSE AFFIDAVIT		1. Arrest 2. N.T.A.		3. Request for Warrant 4. Request for Capias		Juvenile <input type="checkbox"/>	
Agency ORI Number FLO: 5 0 0 0 0 0		Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE		Agency Report Number 0 6 - 02 - 10944881					
Charge Type: Check as many as apply		<input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony		<input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor		<input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other		Special Notes:	
Name (Last-First, Middle) Legioner, Anthony		Alias		Race Wm		Sex M			
Charge Description Grand Theft \$10.00 (2nd)		Charge Description		Charge Description					
Victim's Name Last, First, Middle Hollenger, William		Local Address (Street, Apt. Number) 1220 Hollenger Tr Wellington FL 33411		(City) (State) (Zip)		Phone 822-0520		Address Source West/comp	
Business Address (Name, Street) Same		(City) (State) (Zip)		Phone		Occupation			
<p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law:</p> <p><input type="checkbox"/> committed the below acts in my presence. <input type="checkbox"/> confessed to _____ admitting to the below facts.</p> <p><input checked="" type="checkbox"/> was observed by Sgt Angelone who told me that he/she saw the arrested person commit the below acts. <input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the _____ day of _____ 20__ at _____ <input type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p>									
<p>and place the game back on the shelf. In some captured videos the subject is facing the camera and you can see him getting the game box in plain view. Store Employee, Sgt Angelone also witnessed the video surveillance tape and he gave a sworn statement. The suspect is known to him Member #0962516974 this being Anthony Ferguson who he has known for years. It was also found that Mr Ferguson also did some crime under case #02-107617 on 8-24-02 where he was also identified. The value of the stolen property in this case is \$900.00. Due to the position of the suspect with the crime capture on the video it is clear that the defendant is guilty of the crime. This action is contrary to F.S. filed for amount not in system yet arrested 10-19-02</p>									
<p>STATE OF FLORIDA - PALM BEACH COUNTY</p> <p>I hereby certify that the foregoing is a true copy of the record in my office with corrections if any as required by law.</p> <p>THIS DAY OF Aug, 2002</p> <p>SHARON R. BOKK CLERK & COMPTROLLER</p> <p>By [Signature] DEPUTY CLERK</p>									
<p>STATE OF FLORIDA COUNTY OF PALM BEACH</p> <p>[Signature] Notary Public, Clerk of Court, Officer (F.S. 117.10)</p> <p>Notary Public, Clerk of Court, Officer (F.S. 117.10)</p>									

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION "W" (CGS)

STATE OF FLORIDA

CASE NO. 02CF012205A02
BOOKING NO. 2002343589

vs.

ANTHONY LUIS ZAC FIGUEROA,
[REDACTED]

INFORMATION FOR

GRAND THEFT

ORIGINAL

FILED
02 OCT 29 PM 12:14
CLERK OF COURT
Palm Beach County, Florida

In the Name and by Authority of the State of Florida:

BARRY E. KRISCHER, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that ANTHONY LUIS ZAC FIGUEROA on or about August 11, 2002, in the County of Palm Beach and State of Florida, did knowingly obtain or use, or endeavor to obtain or use video games of a value of \$300.00 or more, which was the property of HOLLYWOOD VIDEO, or any other person not the defendant(s), with the intent to permanently or temporarily deprive HOLLYWOOD VIDEO or any other person not the defendant(s) of the property or benefit therefrom or to appropriate the property to the use of ANTHONY LUIS ZAC FIGUEROA or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1) and (2)(c). (3 DEG FEL)

Jill Estey Richstone
JILL ESTEY RICHSTONE
FL. BAR NO. 0928933
Assistant State Attorney

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, JILL ESTEY RICHSTONE Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.

Jill Estey Richstone
Assistant State Attorney

Sworn to and subscribed to before me this 29 day of October, 2002.

STATE OF FLORIDA - PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.

JER/sw



THIS DAY OF October, 2002

SHARON R. BOCK
CLERK & COMPTROLLER

FCIC REFERENCE NUMBERS

GRAND THEFT 2399 By Shawen

DEPUTY CLERK

Ellen Jordan
NOTARY PUBLIC, State of Florida



Ellen Jordan
MY COMMISSION # CC799741 EXPIRES
December 28, 2002
BONDED THRU TROY FAIR INSURANCE, INC.

GM_01204

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

CASE NO. 02 012205CF A02 DIV. W

OBTS NUMBER _____

STATE OF FLORIDA

[] COMMUNITY
CONTROL
VIOLATOR

[] PROBATION
VIOLATOR

01/28/2003 11:36:12 20030047647
OR BK 14720 PG 1936

Palm Beach County, Florida
Dorothy H. Wilken, Clerk
STATE OF FLORIDA - PALM BEACH COUNTY

I hereby certify that the foregoing is a
true copy of the record in my office with
redactions, if any as required by law.



THIS DAY OF Aug 2018
SHARON R. BOOK
CLERK & COMPTROLLER

Stowers
DEPUTY CLERK

v. Anthony Luis Zac Figueroa
DEFENDANT

W
RACE

M
GENDER

SOCIAL SECURITY NUMBER

FILED

JAN 15 2003

JUDGMENT

DOROTHY H. WILKEN, CLERK
CIRCUIT & COUNTY COURTS

The above Defendant, being personally before this Court represented by S. Lawrence APP (attorney)

[] Having been tried and found guilty of
the following crime(s):

☒ Having entered a plea of guilty to
the following crime(s):

[] Having entered a plea of nolo
contendere to the following
crime(s):

COUNT	CRIME	OFFENSE STATUTE NUMBER(S)	DEGREE
<u>1</u>	<u>Grand Theft</u>	<u>812.014(1) and (2)(c)</u>	<u>3rd</u>

and no cause having been shown why the Defendant should not be adjudicated guilty. IT IS ORDERED THAT the Defendant is hereby
ADJUDICATED GUILTY of the above crime(s).

[] and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty regardless of adjudication, to attempts or
offenses relating to sexual battery (ch. 794), lewd and lascivious conduct (ch. 800), or murder (s. 782.04), aggravated battery (s. 784.045),
burglary (s. 810.02), carjacking (s. 812.133), or home invasion robbery (s. 812.135), or any other offense specified in section 943.325, the
defendant shall be required to submit blood specimens.

~~and good cause being shown IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD.~~

SENTENCE
STAYED

[] The Court hereby stays and withholds imposition of sentence as to count(s) and places the Defendant on
[] Probation and/or [] Community Control under the supervision of the Dept. of Corrections (conditions of probation
set forth in separate order).

SENTENCE
DEFERRED

[] The Court hereby defers imposition of sentence until _____

The Defendant in Open Court was advised of his right to appeal from the Judgment by filing notice of appeal with the Clerk of Court within thirty days
following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance
of counsel in taking said appeal at the expense of the State upon showing of indigency.

DONE AND ORDERED in Open Court at Palm Beach County, Florida, this 15 day of January 2003

John J. Hays
CIRCUIT COURT JUDGE

GM_01205

PLEA IN THE CIRCUIT COURT
THE FOLLOWING IS TO REFLECT ALL TERMS OF THE NEGOTIATED SETTLEMENT

Name: Anthony Luis Zac FigueroaPlea: Guilty ☒ Guilty/Best Interest ☐ Nolo Contendere ☐

Case No.	Charge	Count	Lesser	Degree
2012206CFAD2	Grand Theft	1	—	3 rd
2012205CFAD2	Grand Theft	1	—	3 rd

FILED

JAN 15 2003

DOROTHY H. WILKEN, CLERK
CIRCUIT & COUNTY COURT 3
(CRIM. DIV.)

State to Nolle Prose the following at sentencing: _____

PSI: Waived/Not Required ☒ Required/Requested ☐ADJUDICATION: Adjudicate ☒ Withhold ☐ Court's Discretion []

If the Defendant is convicted of possession, sale, trafficking or conspiracy to possess, sell or traffic in any controlled substance, the Court directs the Department of Motor Vehicles and Highway Safety to revoke the Defendant's driver's license for two (2) years. If the Defendant is convicted of grand theft of a motor vehicle; theft of motor vehicle parts; or, any felony in the commission of which a motor vehicle was used, the Court directs the Department of Motor Vehicles and Highway Safety to revoke the Defendant's driver's license as mandated by law. The Clerk is directed to make the proper notifications.

SENTENCE:

\$ _____ Fine \$ _____ Court Costs \$ _____ Drug Trust Fund

\$ _____ Cost of Prosecution \$ _____ Public Defender Fees/Costs

Incarceration: _____ Days _____ Months _____ Years

with credit for time served; which is _____ days.

PROBATION:

ALL CONDITIONS OF PROBATION MUST BE SUCCESSFULLY COMPLETED NO LESS THAN 30 DAYS BEFORE

PROBATION IS SCHEDULED TO TERMINATE UNLESS STATED BELOW.

STANDARD CONDITIONS OF PROBATION HAVE BEEN EXPLAINED BY DEFENSE COUNSEL.

SPECIAL CONDITIONS OF PROBATION:

- (A) Restitution as per the accompanying order. [☒] (check if ordered) \$1900.00
- (B) Fine: \$ _____ Court Costs: \$ 311 Drug Trust Fund: \$ 50
- Cost of Prosecution \$ 50 Public Defender Fees/Costs \$ 190
- (C) Substance abuse evaluation and successful completion of recommended treatment [☒] (check if ordered) (enroll within 30 days) If in custody, release only to _____
- (D) Random Drug Testing at Defendant's expense [☐] (check if ordered)
- (E) _____ hours of community service at a rate of no less than _____ hours per month
- (F) Incarceration: _____ Days _____ Months _____ Year
- with credit for time served; which is _____ days.

OTHER COMMENTS OR CONDITIONS:

to complete Theft statement course, & to have no contact w/ Hollywood video in Palm Beach County. If find & agrees that they are in possession of O.S. owned property they are to return property back.

SENTENCING IS DEFERRED UNTIL _____ DAY OF _____, 2003. IN COURT ROOM

THE DEFENDANT UNDERSTANDS IF SHE FAILS TO APPEAR OR IS ARRESTED ON NEW CHARGES, A CAPIAS WILL BE ISSUED AND THE COURT WILL IMPOSE ANY LAWFUL SENTENCE.

Assistant State Attorney: Sharon R. Bock
 CLERK & COMPTROLLER

Date of Plea: 1/15/2003

DEPUTY CLERK

Attorney for the Defendant

Defendant: Anthony Figueroa GM 01206

In the Circuit Court of the Fifteenth Judicial Circuit
In and For Palm Beach County, Florida

Case No. 02012206 CF A02

Division: W

STATE OF FLORIDA

VS.

Anthony Luis Zac Figueroa
Defendant

FILED
Circuit Criminal Department

ORDER MODIFYING PROBATION

THIS cause has come before the Court on the Defendant's Violation of Probation. Upon consideration, it is hereby:

ORDERED AND ADJUDGED that the Defendant's Probation is modified as follows:

probation extended for a period
of 6 months with which time
defendant will undergo a
drug abuse evaluation + commence
any recommended treatment

☒ Defendant admits the Violation of Probation.

☒ All Original terms and conditions to remain in effect.

☐ Defendant is sentenced to _____ days/months Palm Beach County Jail with credit for _____ days.

DONE AND ORDERED this 20 day of May, 2005.

STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.

THIS DAY OF May, 2005

SHARON R. BOCK
CLERK & COMPTROLLER

By [Signature]
DEPUTY CLERK

[Signature]
Circuit Judge

GM_01207

EB MAY 25 2005

PROBABLE CAUSE AFFIDAVIT

1. Arrest
2. N.T.A.3. Request for Warrant
4. Request for CapiasJuvenile ☒

ADMIN	OBT Number		Agency ORI Number FLO. 5 0 0 0 0 0 0		Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE		Agency Report Number 0 6 1 0 2 1 1 0 7 6 1 7 1	
CHARGES	Charge Type: Check as many as apply. <input checked="" type="checkbox"/> 1. Felony <input checked="" type="checkbox"/> 2. Traffic Felony		<input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor		<input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other		Special Notes:	
DEF.	Name (Last, First, Middle) FIGUEROA, Anthony		Alias		Race Wm		Sex M	
VICTIM	Charge Description Grand Theft Fss# 812.014(2c1)		Charge Description		Charge Description		Charge Description	
	Victim's Name (Last, First, Middle) Holly Wood Uiedo		Race Wm		Sex M		Date of Birth 12/1/71	
VICTIM	Local Address (Street, Apt. Number) 13920 Wellington Trace		(City) Wellington		(State) FL		(Zip) 333-0520	
	Business Address (Name, Street) Same		(City) Wellington		(State) FL		(Zip) 333-0520	
<p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed, the following violation of law.</p> <p><input type="checkbox"/> The Person taken into custody ...</p> <p><input type="checkbox"/> committed the below acts in my presence.</p> <p><input type="checkbox"/> confessed to ...</p> <p><input checked="" type="checkbox"/> was observed by JARROD ANGELONI who told Det D. Smith #3483</p> <p><input checked="" type="checkbox"/> that he/she saw the arrested person commit the below acts.</p> <p><input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the _____ day of _____ 20__ at _____ <input type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p> <p>On 8-24-02 it was reported that a Grand Theft had occurred at Holly Wood Uiedo located at 13920 Wellington Trace in Wellington Fla. The store Manager Philip Papulis advised that they had found that several Uiedo Games had been stolen out of their box and the Box left on the shelf. It was found that the suspect had come into the store while open to the Public and cut the side of the Game box with a sharp object and took the game out of the box leaving the Box on the shelf. Mr Papulis advised that this has occurred several times in the last few weeks. It was found however that on 8-24-02 after inventory that 20 Uiedo Games had been stolen this date. Uiedo is a Game box and they have all 20 damaged boxes. Mr Papulis advised that on one of the cut boxes that the suspect had cut him self while committing the crimes as on one of the boxes was covered in blood. Mr Papulis advised that the crime was captured on the Surveillance Camera and he had</p>								
ADMINISTRATIVE	<p>STATE OF FLORIDA COUNTY OF PALM BEACH</p> <p><i>[Signature]</i> 3483 Notary Public, Clerk of Court, Officer (F.S.S. 117.10)</p> <p><i>[Signature]</i> 3483 30th August 2002 by Det D. Smith Personally Known</p> <p>Notary Public, Clerk of Court, Officer (F.S.S. 117.10)</p> <p>Notary Public, Clerk of Court, Officer (F.S.S. 117.10)</p>							

GM_01208 PAGE 3

OBTS Number		PROBABLE CAUSE AFFIDAVIT		1. Arrest 2. N.T.A.		3. Request for Warrant 4. Request for Capias		Juvenile <input checked="" type="checkbox"/>	
ADMIN	Agency ORI Number FLO 5 0 0 0 0 0	Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE			Agency Report Number 0 6 1 0 2 1 0 7 6 1 7 1 1				
DEF	Charge Type: Check as many as apply <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other			Special Notes:					
CHARGES	Name (Last, First, Middle) Laverne, Anthony D.			Alias		Race W		Sex M	
VICTIM	Charge Description Grand Theft FSS 812.04(8)(c)			Charge Description		Charge Description		Charge Description	
	Victim's Name (Last, First, Middle) Hill, Robert (Video)			Race		Sex		Date of Birth	
	Local Address (Street, Apt. Number) 1320 Wellington Terrace West (Fla)			(City) (State) (Zip)		Phone 333-0520		Address Source Direct/Compel	
	Business Address (Name, Street) Same			(City) (State) (Zip)		Phone		Occupation Same	
<p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.</p> <p><input type="checkbox"/> committed the below acts in my presence.</p> <p><input type="checkbox"/> confessed to _____</p> <p><input checked="" type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts.</p> <p><input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the _____ day of _____ 20____ at _____ <input type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p> <p>the video. On 8-30-02 this Detective met with Mr. Papuli and two of his Employees. We viewed the video tape and it was found that on the tape the crime was captured and it showed a Wm in long shorts wearing a long shirt picking up the video game box and in some cases putting it under his shirt then using force and then placing the tape back on the shelf. In some cases he is facing the camera and you can see him cutting the box and putting the video game in his pants. Store Employee, Tarek Angeloni also viewed the video tape and gave a sworn statement that the suspect is known to him store Number # 00962516974. This being Anthony F. Laverne who he has known for years. The suspect watched the video Home Depot at 814 W. and left the store at 18:33 hrs. I obtained also a sworn statement from store manager Mr. Papuli advising his store will purchase. It was later found on 8-30-02 that shortly after I left the store interview that Anthony</p>									
ADMINISTRATIVE	<p>STATE OF FLORIDA COUNTY OF PALM BEACH</p> <p>Signature of Arresting Investigative Officer Det. [Signature] 3453</p> <p>The foregoing information was personally affirmed and subscribed before me this _____ day of August 2002 by Det. [Signature] 3453</p> <p>(Print name of Arresting/Investigative Officer), who is personally known to me and/or produced identification type of identification produced</p> <p>Notary Public, Clerk of Court, Officer (F.S.S. 117.10)</p> <p>Notary Public # 3745 2/5 from 642</p> <p>GM_01209 PAGE 3</p>								

OBT Number		PROBABLE CAUSE AFFIDAVIT		1. Arrest 2. N.T.A.		3. Request for Warrant 4. Request for Capias		Juvenile	
Agency ORI Number FLO 5 0 0 0 0 0		Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE		Agency Report Number 0 6 1 0 2 1 0 7 6 1 7					
Charge Type: Check as many as apply <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other		Special Notes:							
Name (Last, First, Middle) Luis Figueroa Anthony		Alias		Race		Sex		Date of Birth	
Charge Description Grand Theft FSS 812.01(2)(a)		Charge Description		Charge Description		Charge Description		Charge Description	
Victim's Name (Last, First, Middle) Luis Figueroa Victor		Race		Sex		Date of Birth		Address Source	
Local Address (Street, Apt. Number) 1320 1/2 W. 1st St. Ft. Lauderdale, FL 33305		City		State		Zip		Phone	
Business Address (Name, Street) Same		City		State		Zip		Phone	
Occupation Same									
The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. The Person taken into custody ... <input type="checkbox"/> committed the below acts in my presence. <input type="checkbox"/> confessed to ... admitting to the below facts. On the ... day of ... 20 ... at ... <input type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)		I was observed by ... who told ... that he/she saw the arrested person commit the below acts... was found to have committed the below acts, resulting from my (described) investigation.							
Figueroa came into the store with his hand dressed this due to the possible cut received while committing the crime as bloodless. Some one of the video boys. Mr. Figueroa however left the store before police could arrive. Due to my findings as stated herein and with portfolio in mind of the suspect I find there is Probable Cause for the arrest of Mr. Figueroa for the crime of Grand Theft as his actions are contrary to FSS. The Probable Cause is stated as apparent to the officer.									
STATE OF FLORIDA COUNTY OF PALM BEACH		I hereby certify that the foregoing is a true copy of the record in my office with all attachments as required by law. THIS 8 DAY OF AUGUST 2003 SHARON R. BOCK CLERK & COMPTROLLER By: [Signature] DEPUTY CLERK							
STATE OF FLORIDA COUNTY OF PALM BEACH		I, the undersigned, do hereby certify and subscribe before me this ... day of ... 2003 by Det. A. Smith Jr. 70th Det. 2003 Personally known Sgt. [Signature] #3745 Notary Public, Clerk of Court, Officer (F.S.S. 117.40)							
ADMINISTRATIVE		30th August 2003							
		7/5/03							
		6147							
		GM_01210							
		3 or 3							

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION "W" (CGS)

STATE OF FLORIDA

CASE NO. 02CF012206A02
BOOKING NO. 2002343590

vs.

ANTHONY LUIS ZAC FIGUEROA,
W/M, [REDACTED]

ORIGINAL

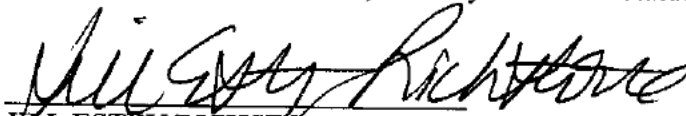
FILED
02 OCT 29 PM 12:14

INFORMATION FOR:

GRAND THEFT

In the Name and by Authority of the State of Florida:

BARRY E. KRISCHER, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that ANTHONY LUIS ZAC FIGUEROA on or about October 24, 2002, in the County of Palm Beach and State of Florida, did knowingly obtain or use, or endeavor to obtain or use video games of a value of \$300.00 or more, which was the property of HOLLYWOOD VIDEO, or any other person not the defendant(s), with the intent to permanently or temporarily deprive HOLLYWOOD VIDEO or any other person not the defendant(s) of the property or benefit therefrom or to appropriate the property to the use of ANTHONY LUIS ZAC FIGUEROA or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1) and (2)(c). (3 DEG FEL)

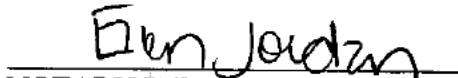

JILL ESTEY RICHSTONE
FL. BAR NO. 0928933
Assistant State Attorney

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, JILL ESTEY RICHSTONE Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.


Assistant State Attorney

Sworn to and subscribed to before me this 29 day of October, 2002.


NOTARY PUBLIC, State of Florida

JER/sw

STATE OF FLORIDA • PALM BEACH COUNTY

FCIC REFERENCE NUMBERS
GRAND THEFT 2002

I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.
COMMISSION # CC799741 EXPIRES
December 28, 2002
BONDED THRU TROY FAIR INSURANCE, INC.

SHARON R. BOOK
CLERK & COMPTROLLER

By 
DEPUTY CLERK

GM_01211

IN THE CRIMINAL DIVISION OF THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT OF FLORIDA.
IN AND FOR PALM BEACH COUNTY

CASE NO. 02012206 CF A02 DIV. W

OBTS NUMBER _____

STATE OF FLORIDA

☐ COMMUNITY
CONTROL
VIOLATOR

01/28/2003 11:36:12 20030047648
OR BK 14720 PG 1937
Palm Beach County, Florida
Dorothy H. Wilken, Clerk

v.
Anthony Luis Zac Figueroa
DEFENDANT

☐ PROBATION
VIOLATOR

W
RACE

M
GENDER

SOCIAL SECURITY NUMBER

FILED

JAN 15 2003

JUDGMENT

DOROTHY H. WILKEN, CLERK
CIRCUIT & COUNTY COURTS

The above Defendant, being personally before this Court represented by

S. Lawrence APB

(attorney)

☐ Having been tried and found guilty of
the following crime(s):

☒

Having entered a plea of guilty to
the following crime(s):

☐ Having entered a plea of nolo
contendere to the following
crime(s):

COUNT	CRIME	OFFENSE STATUTE NUMBER(S)	DEGREE
<u>1</u>	<u>Grand Theft</u>	<u>812.014(1) and (2)(c)</u>	<u>3rd</u>

and no cause having been shown why the Defendant should not be adjudicated guilty, IT IS ORDERED THAT the Defendant is hereby
ADJUDICATED GUILTY of the above crime(s).

☐ and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty, regardless of adjudication, to attempts or
offenses relating to sexual battery (ch. 794), lewd and lascivious conduct (ch. 800), or murder (s. 782.04), aggravated battery (s. 784.045),
burglary (s. 810.02), carjacking (s. 812.133), or home invasion robbery (s. 812.135), or any other offense specified in section 943.325, the
defendant shall be required to submit blood specimens.

~~and good cause being shown: IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD~~

SENTENCE
STAYED

☐ The Court hereby stays and withholds imposition of sentence as to count(s) and places the Defendant on
☐ Probation and/or ☐ Community Control under the supervision of the Dept. of Corrections (conditions of probation
set forth in separate order).

SENTENCE
DEFERRED

☐ The Court hereby defers imposition of sentence until _____

The Defendant in Open Court was advised of his right to appeal from this judgment by filing notice of appeal with the Clerk of Court within thirty days
following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance
of counsel in taking said appeal at the expense of the State upon showing of indigency.

DONE AND ORDERED in Open Court at Palm Beach County, Florida, this 15 day of January, 2003

CIRCUIT COURT JUDGE

GM_01212

HOY
"W"

DC# W14116
Officer: 15-3

**JUDGMENT OF GUILT
AND PLACING DEFENDANT ON PROBATION**

FILED
2003 JAN 23 PM 12:34
DOROTHY H. WILKEN
CLERK OF COURTS
PALM BEACH CO., FL.
In The Circuit Court
of Palm Beach County, Florida
Case No. 02-12206CFA02

STATE OF FLORIDA
-vs- Plaintiff
ANTHONY LUIS ZACFIGUEROA
Defendant

This cause coming on this day to be heard before me, and you, the defendant ANTHONY LUIS ZACFIGUEROA, being now present before me, and you having:
PLED GUILTY TO

The offense of COUNT 1. GRAND THEFT the court hereby adjudges you to be guilty of said offense; and

It appearing to the satisfaction of the Court that you are not likely again to engage in a criminal course of conduct, and that the ends of justice and the welfare of society do not require that you should suffer the penalty authorized by law:

Now, therefore, it is ordered and adjudged that the imposition of sentence are hereby withheld, and that you are hereby placed on probation for a period of EIGHTEEN (18) MONTHS CONCURRENT WITH 02-12205CFA02 under the supervision of the Department of Corrections and its Officers, such supervision to be subject to the provisions of the laws of this State.

It is further order that you shall comply with the following conditions of probation:

- (1) Not later than the fifth day of each month or as directed, you will make a full and truthful report to your Probation Officer on the form provided for that purpose.
- (2) You will pay to the State of Florida the amount of \$ 50.00 FIFTY DOLLARS per month, plus a 4% surcharge, toward the cost of your supervision, unless otherwise exempted in compliance with Florida Statutes.
- (3) You will not change your residence or employment or leave the county of your residence without first procuring the consent of your Probation Officer.
- (4) You will neither possess, carry or own any weapons or firearm without first securing the consent of your Probation Officer.



ZacFiguerroa, Anthony
Case # 02-12206CFA02

- (5) You will live and remain at liberty without violating any law. A conviction in a court of law shall not be necessary in order for such a violation to constitute a violation of your probation.
- (6) You will submit to Urinalysis, Breathalyzer or Blood tests, as directed by your Probation Officer or the Professional Staff of any treatment center where you may be receiving treatment, to determine the possible use of alcohol, drugs or controlled substances.
- (7) You will make a good faith effort to obtain lawful employment and support any dependents to the best of your ability as directed by your Probation Officer.
- (8) You will promptly and truthfully answer all inquiries directed to you by the Court or the Probation Officer, and allow the Officer to visit in your home, at your employment site, or elsewhere, and you will comply with all instructions he may give you.
- (9) RESTITUTION TO: HOLLYWOOD VIDEO IN THE AMOUNT OF \$1000.00 MINIMUM PAYMENT OF \$55.56 PER MONTH – CRO FILED
- (10) NO CONTACT WITH HOLLY VIDEO IN PALM BEACH CO.
- (11) ENTER AND COMPLETE: THEFT ABATEMENT PROGRAM
- (12) AUTOMATIC EARLY TERMINATION AFTER 12 MONTHS PROVIDED ALL CONDITIONS ARE SATISFIED

You are hereby placed on notice that the Court may at any time rescind or modify any of the conditions of your probation, or may extend the period of probation as authorized by law, or may discharge you from further supervision; and that if you violate any of the conditions of your probation, you may be arrested and the Court may revoke your probation and impose any sentence which it might have imposed before placing you on probation.

It is further ordered that when you have reported to the Probation Officer and have been instructed as to the conditions of probation you shall be released from custody if you are in custody and if you are at liberty on bond, the sureties thereon shall stand discharged from liability.

ZacFigueroa, Anthony
Case # 02-12206CFA02

It is further ordered that the Clerk of this Court file this order in his office, record the same in the Minutes of the Court, and forthwith provide certified copies of same to the Probation Officer for his use in compliance with the requirements of law.

DONE AND ORDERED IN OPEN COURT THIS 15TH DAY OF JANUARY, 2003.

Signed this 22 day of January, 2003. John J. H.
JUDGE

I acknowledge receipt of a certified copy of this order and that the conditions have been explained to me.

Date: _____ Probationer _____

Instructed by: _____

Original: Court
Copies: Probationer/File

DC4-900A

JF 1/16/03

STATE OF FLORIDA • PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.
THIS 22 DAY OF January, 2003
SHARON R. BOCK
CLERK & COMPTROLLER
By Shawers
DEPUTY CLERK

In the Circuit Court of the Fifteenth Judicial Circuit
In and For Palm Beach County, Florida

Case No. 02012205CF A02

Division: W

STATE OF FLORIDA

VS.

Anthony Luis Zac Figueroa
Defendant

FILED
Circuit Original Department

ORDER MODIFYING PROBATION

THIS cause has come before the Court on the Defendant's Violation of Probation. Upon consideration, it is hereby:

ORDERED AND ADJUDGED that the Defendant's Probation is modified as follows:

probation extended for a period
of 6 months with which time
defendant will undergo a
drug abuse evaluation + commence
any recommended treatment

☒ Defendant admits the Violation of Probation.

☒ All Original terms and conditions to remain in effect.

☐ Defendant is sentenced to _____ days/months Palm Beach County Jail with credit for _____ days.

DONE AND ORDERED this 20th day of May, 2005.



I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any, as required by law.

THIS 20th DAY OF May, 2005

SHARON R. BOCK
CLERK & COMPTROLLER

By [Signature]
DEPUTY CLERK

[Signature]
Circuit Judge

CM_01216

MAY 24 2005

EB
33

DISTRIBUTION: WHITE - COURT COPY GREEN - STATE ATTORNEY YELLOW - AGENCY PINK - AGENCY GOLD - DEFENDANT (N.T.A.'s ONLY)

OBT Number		PROBABLE CAUSE AFFIDAVIT		1. Arrest 2. N.T.A.		3. Request for Warrant 4. Request for Capias		Juvenile <input checked="" type="checkbox"/>	
Agency ORI Number FLO 5 0 0 0 0 0		Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE		Agency Report Number 0 6 1 0 2 1 1 2 8 8 2 1 1 1					
Charge Type: Check as many as apply		1. Felony <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/>		3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/>		5. Ordinance <input type="checkbox"/> 6. Other <input type="checkbox"/>		Special Notes:	
Name (Last, First, Middle) Figueroa, Anthony		Alias		Race W		Sex M			
Charge Description Grand Theft		Charge Description		Charge Description		Charge Description			
Victim's Name (Last, First, Middle) Hollywood Video		Race		Sex		Date of Birth			
Local Address (Street, Apt. Number) 13920 Wellington Trace		(City) Wellington		(State) FL		(Zip) 33414		Phone () () () () () ()	
Business Address (Name, Street) 13920 Wellington Trace		(City) Wellington		(State) FL		(Zip) 33414		Phone () () () () () ()	
Occupation		Address Source		Occupation		Occupation			
<p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.</p> <p><input checked="" type="checkbox"/> committed the below acts in my presence.</p> <p><input type="checkbox"/> confessed to admitting to the below facts.</p> <p><input checked="" type="checkbox"/> was observed by Philip Napuli who told D/s Van Dusen that he/she saw the arrested person commit the below acts.</p> <p><input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the 19 day of October 2002 at 600 <input type="checkbox"/> A.M. <input checked="" type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p>									
<p>I responded to Hollywood Video located at 13920 Wellington Trace in Palm Beach County in response to a shoplifting call. P.B.S.O. dispatch was advised by store manager Philip Napuli that two white males were stuffing the pockets of their shorts with video games. These w/m later identified as Anthony Figueroa and [REDACTED] were caught on video surveillance which has been entered into P.B.S.O. evidence. These 2 subjects were apprehended by myself and D/s Conley leaving the store. The subjects had 7 video games in the pockets of their shorts. (3 playstation 2, 3 XBox and 1 Gamecube). These games totaled \$350.00. Also these 2 subjects were identified by Napuli as they were leaving the store. It should be noted that Anthony Figueroa was apprehended attempting to enter his vehicle. He did have the driver side door open and was getting in. Upon search of his vehicle which was taken for forfeiture 6 other video games were found without receipts. These were placed into evidence. Store manager told me that [REDACTED] came to the counter and asked a clerk questions in an attempt to distract him while Figueroa left the store. [REDACTED] then also left neither subject made any attempt to pay for the games. Based upon the above described investigation I believe [REDACTED] are guilty of the following:</p>									
STATE OF FLORIDA COUNTY OF PALM BEACH		I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.		DATE OF 10 October 2002		ARON R. BOOK CLERK & COMPTROLLER		VAN DUSEN	
(Signature of Arresting Investigative Officer)		The foregoing instrument was sworn to or affirmed and subscribed before me this		10 October 2002		DEPUTY CLERK		GM_01218 PAGE 1 OF 2	
(Print name of Arresting Investigative Officer, who is personally known to me and/or produced identification. Type of identification produced)		Notary Public, Clerk of Court, Officer (F.S.S. 117.10)		By		DEPUTY CLERK			

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

DS JASON VANDUSEN, 6142
PALM BEACH COUNTY SHERIFFS OFFICE
Agency case number 02-128821

CASE NO. 02CF012204A99
Booking No. 2002343586

STATE OF FLORIDA

vs.

ANTHONY LUIS ZAC FIGUEROA, W/M, 

02 OCT 29 PM 12:14
FILED
CLERK OF THE COURT
PALM BEACH COUNTY, FLORIDA

NO FILE FOR:

GRAND THEFT

The State enters a no-file because the elements of the crime cannot be proven beyond a reasonable doubt.

BARRY E. KRISCHER, STATE ATTORNEY

DATE: October 28, 2002

By: 

JILL ESTEY RICHSTONE
Assistant State Attorney
FL. BAR NO. 0928933

JER/sw

CLERK AND SHERIFF TO RESCIND NO CONTACT ORDER

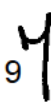


STATE OF FLORIDA • PALM BEACH COUNTY


I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.

THIS 28 DAY OF Aug 2002
SHARON R. BOOK
CLERK & COMPTROLLER

By: 
DEPUTY CLERK

GM_01219 

ADMIN	OBTS Number	PROBABLE CAUSE AFFIDAVIT		1. Request for Warrant 2. Request for Capias	3. Request for Warrant 4. Request for Capias	1	Juvenile	
Agency ORI Number FLO 5 0 2 8 0 0	Agency Name ROYAL PALM BEACH POLICE DEPARTMENT			Agency Report Number 8 6 - 0 0 3 8 1 2				
Charge Type: Check as many as apply.	<input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony		<input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor		<input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other			Special Notes:
Name (Last, First, Middle) Figueróa, Anthony Luis Zac	Alias			Race W	Sex M			
Charge Description Grand Theft Auto	Charge Description							
Charge Description	Charge Description							
Victim's Name (Last, First, Middle) Figueróa, Richard Jr.				Race W	Sex M			
Business Address (Name, Street)	(City)	(State)	(zip)	Phone	Address			
The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. The Person taken into custody ... <input checked="" type="checkbox"/> committed the below acts in my presence. <input type="checkbox"/> confessed to _____ admitting to the below facts. <input type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts. <input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation. On the <u>22nd</u> day of <u>October</u> , 20 <u>00</u> at <u>12:27</u> <input checked="" type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)								
I met with victim Richard Figueróa, Jr., who told me that he allowed his brother, Anthony, to use his 1986 Mazda pick-up truck to drive a friend home to Okeechobee Blvd. and Cherry Road at about 8pm, on 10/21/00. Richard told me that he has always been very specific about the times and use he allows his brother to use the truck, to the extent that he has told Anthony that if the truck were not brought back in the allotted time, he would call the police and report the truck stolen. For this trip, Anthony told Richard he would be back in 30 minutes. At about 10:15pm, Anthony called Richard to say that the truck had a flat tire, and that he would be right home. Richard asked Anthony where he was and Anthony would not say. At about 12:22am, on 10/22/00, Richard called the police department to report the truck stolen.								
I explained the seriousness about reporting a vehicle stolen, to the extent that is covered on the stolen vehicle affidavit. Richard filled-out this form and signed the same without any hesitation. Richard further stated that he had to be at work in the morning and was concerned since he needed the vehicle to get there.								
At about 01:55am, Officer T.E. Murphy located and stopped this vehicle, near Huntington Woods and Royal Palm Beach Boulevard. Driving was a _____ and Anthony was in the passenger's seat. I responded to this location where the two were still inside the vehicle. Both subjects were placed under arrest for Grand Theft Auto. Anthony Figueróa, since he first had possession of the vehicle, depriving the victim of the same, and Luckett, for being in actual physical control of the vehicle, also depriving the victim use of his vehicle.								
When the victim arrived to reclaim his vehicle, he inspected the tires and believed that they were the original tires and could not detect any evidence of a flat tire or use of a spare tire. He further wrote me another written statement, indicating to me that Luckett never had permission to drive his truck.								
Figueróa went to the County Jail and _____ went to the Juvenile Assessment Center.								
FILED OCT 23 AM 6:52 CLERK CLERK & COMPTROLLER				STATE OF FLORIDA - PALM BEACH COUNTY I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law. THIS DAY OF _____ 20____ SHARON R. BOCK CLERK & COMPTROLLER By _____ DEPUTY CLERK				
SWORN AND SUBSCRIBED BEFORE ME <i>Sgt. [Signature]</i> NOTARY PUBLIC / CLERK OF COURT / POLICE OFFICER 10-22-00 DATE				SIGNATURE OF ARRESTING / INVESTIGATING OFFICER <i>[Signature]</i> Eli Shaivitz #70 NAME OF OFFICER (PLEASE PRINT) 10-22-00 DATE				
DISTRIBUTION: WHITE -- Court Copy GREEN -- State Attorney YELLOW-- Agency PINK -- Agency GOLDENROB --								

ADMIN.	OBTS Number	PROBABLE CAUSE AFFIDAVIT		1. Request for Warrant 2. Request for Capias	1	Juvenile
DEF.	Agency ORI Number FLO 5 0 2 8 0 0	Agency Name ROYAL PALM BEACH POLICE DEPARTMENT		Agency Report Number 816 - 0 0 3 8 1 2		
	Charge Type: Check as many as apply. <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony		<input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor		<input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other	
CHARGES	Name (Last, First, Middle) Figueroa, Anthony Luis Zac		Alias		Race W	Sex M
	Charge Description Grand Theft (Auto)		Charge Description			
	Charge Description		Charge Description			
	Victim's Name (Last, First, Middle) Figueroa, Richard Jr		Race W		Sex M	
ADMINISTRATIVE	(zip)		Phone		Address	
	(zip)		Phone		Occupation	
	<p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.</p> <p>The Person taken into custody ...</p> <p><input checked="" type="checkbox"/> committed the below acts in my presence. <input type="checkbox"/> confessed to _____ admitting to the below facts.</p> <p><input type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts.</p> <p><input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the 22nd day of October, 2000 at 1:55 <input checked="" type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p>					
	<p>ADDITIONAL PROBABLE CAUSE:</p> <p>At above date and time, I was southbound in the 1300 block of Royal Palm Beach Blvd. when I observed a white and maroon Mazda pickup truck driving north on Royal Palm Beach Blvd. Ofc. Eli Shaivitz had earlier taken a stolen vehicle report on a truck which matched this description. I caught up to the truck and saw that it had Florida tag number D61XWE. This was the tag number of the stolen truck. I stopped the truck in the 100 block of Sherwood Dr. I found _____ V/M _____ to be the driver and Anthony Luis Zac Figueroa W/M _____ to be the passenger. Anthony Figueroa is the brother of the owner and was the original suspect in the stolen car case. Both subjects were taken into custody, secured, and placed in my patrol unit. I transported the to the police station where they were turned over to Ofc. Eli Shaivitz.</p>					
<div style="text-align: center;">  <p>STATE OF FLORIDA - PALM BEACH COUNTY</p> <p>I hereby certify that the foregoing is a true copy of the record in my office with all omissions if any as required by law.</p> <p>THIS DAY OF Aug 16 2010</p> <p>SHARON R. BOCK CLERK & COMPTROLLER</p> <p>By Shawers DEPUTY CLERK</p> </div>						
<p>SWORN AND SUBSCRIBED BEFORE ME</p> <p>Oh Elni #20 NOTARY PUBLIC / CLERK OF COURT / POLICE OFFICER</p> <p>10-22-00 DATE</p> <p>T. E. Murphy #100 SIGNATURE OF ARRESTING / INVESTIGATING OFFICER</p> <p>T. E. Murphy #100 NAME OF OFFICER (PLEASE PRINT)</p> <p>10-22-00 DATE</p> <p>PAGE _____ OF _____</p>						
<p>DISTRIBUTION: WHITE -- Court Copy GREEN -- State Attorney YELLOW-- Agency PINK -- Agency GOLDENROE</p>						

Arrest#	2000346620	Bond#	P07-00274775	Type	SB-PN	\$	3,000	A/C
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Form 611

EXHIBIT GG

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 21, 2016

9:17 a.m.

C O N F I D E N T I A L

Deposition of JOSEPH RECAREY, pursuant
to notice, taken by Plaintiff, at the
offices of Boies Schiller & Flexner, 401
Las Olas Boulevard, Fort Lauderdale, Florida,
before Kelli Ann Willis, a Registered
Professional Reporter, Certified Realtime
Reporter and Notary Public within and
for the State of Florida.

2 A P P E A R A N C E S:

3

4 BOIES SCHILLER & FLEXNER, LLP

5 Attorneys for Plaintiff

401 East Las Olas Boulevard

6 Fort Lauderdale, Florida 33301

BY: BRADLEY EDWARDS, ESQ.

7

8 HADDON MORGAN & FOREMAN, P.C.

Attorneys for Defendant

9 150 East 10th Avenue

Denver, Colorado 80203

10 BY: JEFFREY PAGLIUCA, ESQ.

11

12 JONES FOSTER JOHNSTON & STUBBS, P.A.

Attorneys for Deponent

13 505 South Flagler Drive

Suite 1100

14 West Palm Beach, Florida 33401

BY: JOANNE O'CONNOR, ESQ.

15

16 ALSO PRESENT: Sandy Perkins, Paralegal

Boies Schiller & Flexner

17

Ryan Kick, Videographer

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1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Most of the events that we are going to
3 discuss today occurred, at least the investigation
4 that we're going to discuss today, occurred in 2005
5 and 2006.

6 So can you just tell us what your position
7 was with the Palm Beach Police Department at that
8 time?

9 A. I was a police detective.

10 Q. And did you investigate a person by the
11 name of Jeffrey Epstein?

12 A. I did.

13 Q. All right.

14 What was your role in the investigation of
15 Jeffrey Epstein?

16 A. I was the lead detective once the case was
17 turned over to me by Michelle Pagan.

18 Q. Okay. And as the lead detective, did you
19 review all of the history of the investigation up to
20 the point it was turned over to you?

21 MR. PAGLIUCA: Object to form and
22 foundation.

23 THE WITNESS: Correct.

24 BY MR. EDWARDS:

25 Q. And was that one of your jobs as the lead

1 JOSEPH RECAREY - CONFIDENTIAL

2 investigator over a case, is to acclimate yourself
3 to the history of the case?

4 MR. PAGLIUCA: Object to form and
5 foundation.

6 THE WITNESS: Yes.

7 BY MR. EDWARDS:

8 Q. Just so that the record is clear, will you
9 just give a brief pause in case Mr. Pagliuca has an
10 objection?

11 A. All right.

12 Q. So they can also capture your answer.

13 A. Okay.

14 Q. In reviewing the history of the case, did
15 you review prior police reports, police reports
16 prior to you becoming involved personally?

17 A. I did.

18 Q. Okay. And I've handed you what is marked
19 as Plaintiff's Exhibit 1.

20 (The referred-to document was marked by
21 the court reporter for Identification as
22 Deposition Exhibit 1.)

23 BY MR. EDWARDS:

24 Q. Do you recognize that?

25 A. Yes.

1 JOSEPH RE CAREY - CONFIDENTIAL

2 Police Department incident report as suspects?

3 MS. SCHULTZ: Object to form and
4 foundation.

5 BY MR. PAGLIUCA:

6 Q. These people, right?

7 A. At that time, yes.

8 Q. Well, and then are you aware -- were there
9 any suspects added in any subsequent reports, to
10 your knowledge?

11 A. Not that I'm aware of.

12 Q. In fact, you did not seek a probable cause
13 warrant for any other suspects in this case,
14 correct?

15 MS. SCHULTZ: Object to form and
16 foundation.

17 THE WITNESS: That's correct.

18 BY MR. PAGLIUCA:

19 Q. And Ms. Ghislaine Maxwell is not listed in
20 any of your Palm Beach Police Department incident
21 reports as a suspect in this case, correct?

22 MS. SCHULTZ: Object to form and
23 foundation.

24 THE WITNESS: Not -- no, not as a suspect
25 in this case, no.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Exhibit 1. Are you with me?

3 A. Uh-huh.

4 Q. Okay. Again, this was information that
5 was obtained by Detective Pagan, correct?

6 A. Correct.

7 Q. And it's true, is it not, that this
8 alleged victim never claimed to have been recruited
9 by Ghislaine Maxwell; true?

10 MS. SCHULTZ: Object to form and
11 foundation.

12 THE WITNESS: Correct.

13 BY MR. PAGLIUCA:

14 Q. And this individual, alleged victim No. 1,
15 never identified Ghislaine Maxwell as being at
16 Mr. Epstein's house when she was there, correct?

17 MS. SCHULTZ: Object to form and
18 foundation.

19 THE WITNESS: I don't believe so.

20 BY MR. PAGLIUCA:

21 Q. You don't believe so --

22 A. I don't believe so.

23 Q. That she ever identified Ghislaine Maxwell
24 as being in the house?

25 A. Right.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Okay. She never -- this individual,
3 victim No. 1, never claimed that Ghislaine Maxwell
4 paid her any money, correct?

5 A. Correct.

6 Q. And this individual No. 1 never claimed
7 that Ms. Maxwell instructed her what to wear,
8 correct?

9 A. Right.

10 Q. This individual never claimed that
11 Ghislaine Maxwell told her how to act, correct?

12 A. Correct.

13 Q. This individual never claimed to have met
14 Ghislaine Maxwell ever, correct?

15 A. I don't believe so, no.

16 Q. This individual never claimed to even have
17 spoken to Ghislaine Maxwell ever, correct?

18 A. I don't believe so, no.

19 Q. And when you say "I don't believe so, no,"
20 that means my statement to you is correct; is that
21 right?

22 MS. SCHULTZ: Object to form, foundation.

23 THE WITNESS: Well, you're saying "ever."

24 I don't know if she's ever, ever spoken to --

25

1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. PAGLIUCA:

3 Q. To Detective Pagan.

4 A. Right. To my knowledge, I don't know,
5 because Detective Pagan is the one who actually
6 interviewed her. So I don't know to the answer of
7 "ever." So not to my knowledge.

8 Q. Certainly, nothing in Exhibit 1, Narrative
9 1 reflects that this individual ever met or talked
10 to or spoke to Ghislaine Maxwell, right?

11 A. Right. Not to my knowledge.

12 Q. And, indeed, you would agree with me that
13 if this individual claimed that Ms. Maxwell had
14 something to do with the events listed in Narrative
15 1, you would have folded up on it, as the
16 investigating detective, right?

17 MS. SCHULTZ: Object to the form.

18 THE WITNESS: Either myself or Detective
19 Pagan would have.

20 BY MR. PAGLIUCA:

21 Q. Sure. And when you got the case six
22 months later, if there hadn't been follow-up, you
23 would have followed up on it, right?

24 MS. SCHULTZ: Object to form.

25 THE WITNESS: Correct.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Okay. The person alleged to have brought
3 the alleged victim No. 1 to Mr. Epstein's house is
4 this Hayley Robson individual, correct?

5 A. Yes.

6 Q. Okay. Then with regard to alleged victim
7 No. 2, then this individual did not claim to have
8 been recruited by Ms. Maxwell, correct?

9 MS. SCHULTZ: Object.

10 THE WITNESS: Who would be victim No. 2?

11 BY MR. PAGLIUCA:

12 Q. Well, you can either go to the second page
13 of Exhibit 1 and we can just follow down the victim
14 information, or you can go to the body of the
15 report, whichever is easier for you.

16 MS. SCHULTZ: Can you use the initials?

17 MR. PAGLIUCA: Sure. I can call them 1 or
18 AH or whatever you want to call them. That's
19 fine with me.

20 BY MR. PAGLIUCA:

21 Q. So I'll just say alleged victim AH never
22 claimed to have been recruited by Ms. Maxwell,
23 correct?

24 A. Correct.

25 Q. And alleged victim AH did not claim to

1 JOSEPH RECAREY - CONFIDENTIAL

2 have spoken to Ms. Maxwell ever, correct?

3 MS. SCHULTZ: Object to form.

4 THE WITNESS: It's been a while since I
5 read this report.

6 BY MR. PAGLIUCA:

7 Q. Sure. Is it fair to say, Detective, that
8 this investigation occurred some 12 years ago,
9 right?

10 A. Yeah. Well, yeah.

11 Q. And is it fair to say that you've
12 conducted quite a few investigations over your
13 career?

14 A. Yes.

15 Q. All right.

16 And it's fair to say that it would be
17 impossible for you to remember all the details of
18 this investigation as you sit here today, correct?

19 A. Correct.

20 Q. And you've been referring to Exhibit 1
21 frequently throughout this deposition, correct?

22 A. Yes.

23 Q. And that's because you don't have any
24 present memory of these details, correct?

25 MS. SCHULTZ: Object to form, foundation.

1 JOSEPH RE CAREY - CONFIDENTIAL

2 THE WITNESS: I have some recollection,
3 but I'm not going to have exact dates and times
4 off the top of my head.

5 BY MR. PAGLIUCA:

6 Q. Sure.

7 A. You know, I spoke to over 33 girls
8 regarding this case. So when you say an initial, it
9 takes me a little while to go through the entire
10 list. But to have specifics, I'm not going to be
11 able to remember the exact specifics of -- of the
12 report.

13 Q. I appreciate that.

14 So we can take our time, but do you
15 recall, did AH ever identify Ms. Maxwell has someone
16 she spoke to?

17 A. I don't recall.

18 Q. You don't recall at all?

19 A. I don't recall that she had mentioned
20 Ms. Maxwell.

21 Q. And if she had, you would have put that in
22 your report, correct?

23 A. I believe so, yes, I would have.

24 Q. All right.

25 And so the absence of alleged victim AH

1 JOSEPH RECAREY - CONFIDENTIAL

2 referring to Ms. Maxwell means that she didn't,
3 right?

4 MS. SCHULTZ: Object to form.

5 THE WITNESS: Say the question one more
6 time.

7 BY MR. PAGLIUCA:

8 Q. When we go through this report, and I've
9 gone through it, if any of the alleged victims had
10 identified Ms. Maxwell as someone that they spoke to
11 at Mr. Epstein's house, you would have listed that
12 in your report, right?

13 MS. SCHULTZ: Object to form.

14 THE WITNESS: I believe I would have, yes.

15 BY MR. PAGLIUCA:

16 Q. Yeah.

17 You tried to be thorough and accurate when
18 you were writing your reports, right?

19 A. Yes.

20 Q. And, certainly, you've indicated on direct
21 examination that the identity of people who were at
22 the house was something that was important to your
23 investigation, correct?

24 A. Yes.

25 Q. And that's why you did trash pulls, right?

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. Yes.

3 Q. And then you asked various individuals who
4 was there when you went to Mr. Epstein's house,
5 right?

6 A. Correct.

7 Q. And you then, to the best of your ability,
8 recorded those answers, I take it, as to who was
9 there, right?

10 A. Yes.

11 Q. And with regard to AH, she never said
12 anything about Ghislaine Maxwell being at
13 Mr. Epstein's house, did she?

14 MS. SCHULTZ: Object to form and
15 foundation.

16 BY MR. PAGLIUCA:

17 Q. To you?

18 A. I don't believe she did.

19 Q. Okay. And if she did, it's likely that
20 you would have recorded it, correct?

21 A. Correct, and it would be on the -- it
22 would be on the tape.

23 Q. Right.

24 She never claimed, AH, that Ms. Maxwell
25 paid her, right?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form and
3 foundation.

4 THE WITNESS: Correct.

5 BY MR. PAGLIUCA:

6 Q. She never claimed that -- AH never claimed
7 that Ms. Maxwell instructed her about what to wear,
8 correct?

9 MS. SCHULTZ: Object to the form.

10 THE WITNESS: Correct.

11 BY MR. PAGLIUCA:

12 Q. AH never claimed that Ms. Maxwell told her
13 how to act at Mr. Epstein's house, correct?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: Correct.

16 BY MR. PAGLIUCA:

17 Q. AH never claimed to have met Ghislaine
18 Maxwell anywhere, correct?

19 MS. SCHULTZ: Object to form.

20 THE WITNESS: I don't believe so, no.

21 BY MR. PAGLIUCA:

22 Q. Okay. If we go on to individual alleged
23 victim No. 3, AY, the same question: AY never
24 identified Ms. Maxwell as someone she knew or
25 interacted with in any fashion, correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form.

3 THE WITNESS: No.

4 BY MR. PAGLIUCA:

5 Q. No, she did not?

6 A. No, she did not.

7 Q. Okay. The same with individual No. 4,
8 alleged victim FP: Again, FP never claimed to have
9 met with Ms. Maxwell, correct?

10 MS. SCHULTZ: Object to form and
11 foundation.

12 THE WITNESS: I don't believe so, no.

13 BY MR. PAGLIUCA:

14 Q. Okay. And FP never identified Ms. Maxwell
15 as someone being at Mr. Epstein's house, correct?

16 MS. SCHULTZ: Object to form and
17 foundation.

18 BY MR. PAGLIUCA:

19 Q. And if you need to look at your report --

20 A. No, I don't -- I don't believe so. The
21 only people that recalled Ghislaine at the house
22 was --

23 Q. Sjoberg?

24 A. Johanna Sjoberg.

25 Q. Who was over the age of 18, correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form and
3 foundation.

4 THE WITNESS: And Venero, Christina
5 Venero.

6 BY MR. PAGLIUCA:

7 Q. Who is an adult as well?

8 MS. O'CONNOR: Object to form.

9 THE WITNESS: Yes.

10 BY MR. PAGLIUCA:

11 Q. So out of your entire report, the only two
12 people who ever said anything about Ms. Maxwell were
13 Ms. Sjoberg, who I believe was 23 when you
14 interviewed her?

15 A. Right, but she was --

16 MS. SCHULTZ: Object to form and
17 foundation.

18 THE WITNESS: She was -- she had worked
19 there for quite some time, so you would have to
20 back up, I think, a year or two.

21 BY MR. PAGLIUCA:

22 Q. She was an adult when she worked there?

23 A. Right. She was over the age of 18, right,
24 let's put it that way.

25 Q. And she was not listed by you as a victim

1 JOSEPH RECAREY - CONFIDENTIAL

2 as part of this case, right?

3 A. Correct, because it was between two
4 consenting adults.

5 Q. Exactly.

6 And so that's Ms. Sjoberg, and then the
7 other individual, I think you said Bolero; is that
8 right?

9 A. Venero, Christina Venero. She's a --

10 Q. Adult masseuse, correct?

11 A. Yes. I remember she had lots of tattoos.

12 Q. Tatts, right.

13 But the 17 individuals that you listed in
14 Exhibit 1, none of those individuals ever said the
15 word -- the words "Ghislaina Maxwell" during the
16 course of this investigation to you, correct?

17 MS. SCHULTZ: Object to form and
18 foundation.

19 THE WITNESS: I don't believe so. It
20 would be on the tapes if they did.

21 BY MR. PAGLIUCA:

22 Q. Well, or it would be in your report,
23 right?

24 MS. SCHULTZ: Object to form and
25 foundation.

1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: Either in the report or on
3 the tapes.

4 BY MR. PAGLIUCA:

5 Q. That's an interesting point, so let's talk
6 about that for a moment.

7 This report, this Palm Beach Police
8 Department incident report, Exhibit 1, is a summary
9 of your investigation, correct?

10 A. Correct.

11 Q. And these recitations of your interviews
12 are abbreviated summaries, correct?

13 A. Correct.

14 Q. And so you're typing into this report
15 parts of it but not every word verbatim into the
16 report, correct?

17 A. Right.

18 Q. And, again, the originals of these tapes
19 are somewhere with the FBI at this point, correct?

20 MS. SCHULTZ: Object to form and
21 foundation.

22 THE WITNESS: Correct. Or at the State
23 Attorney's Office.

24 BY MR. PAGLIUCA:

25 Q. Are you aware of any of these originals

1 JOSEPH RECAREY - CONFIDENTIAL

2 That would be one. Probably victim JB would be
3 another. I believe there was a victim ML, as well.

4 Q. Let me ask this question: As you sit here
5 today, do you know who the subjects of the four
6 counts that are referenced on the first page of
7 Exhibit 7 are?

8 A. If I went through the entire PC affidavit,
9 I could -- I could tell you who. But I just named
10 three.

11 Q. Okay.

12 A. So, like I said, I can go through it and
13 tell you who exactly those four counts were for.

14 Q. Okay. We are limited to four, though,
15 right?

16 A. Four instances.

17 MS. SCHULTZ: Object to form.

18 BY MR. PAGLIUCA:

19 Q. Right.

20 And then throughout this entire 22-page,
21 Palm Beach Police Department affidavit,
22 Ms. Maxwell's name does not appear in here once,
23 does it?

24 MS. SCHULTZ: Object to form.

25 THE WITNESS: I don't believe so, no.

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. Correct.

3 Q. And then Mr. Epstein is arrested and ends
4 up pleading guilty and all of that, right?

5 MS. SCHULTZ: Object to form.

6 THE WITNESS: I think there was a
7 non-prosecution agreement prepared between the
8 Feds and some kind of agreement was made. But,
9 yes, he did end up pleading guilty.

10 BY MR. PAGLIUCA:

11 Q. All right.

12 Now, based on the questions that were
13 asked of you in the grand jury, it's fair to say
14 that Ms. Maxwell was not a target of the grand
15 jury's investigation, correct?

16 MS. SCHULTZ: Object to form and
17 foundation.

18 THE WITNESS: Not based on the questions
19 that the state was asking me, no, the state
20 wasn't...

21 BY MR. PAGLIUCA:

22 Q. In fact, it's fair to say that you never
23 said Ms. Maxwell's name in the grand jury, right?

24 MS. SCHULTZ: Object to form and
25 foundation.

1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: No. Based on the questions
3 that the state was asking, no.

4 BY MR. PAGLIUCA:

5 Q. Were you aware of who was being issued
6 subpoenas by the grand jury?

7 A. No. But it wasn't the actual subpoena
8 from the grand jury; it came from the State
9 Attorney's Office.

10 Q. At the direction of the grand jury,
11 though, right?

12 MS. SCHULTZ: Object to form and
13 foundation.

14 THE WITNESS: I don't know. Again, I
15 don't know.

16 BY MR. PAGLIUCA:

17 Q. I would like to talk a little bit about
18 the surveillance that you initiated at Mr. Epstein's
19 house, okay?

20 Can you tell me when the surveillance
21 began?

22 A. It would have started under Detective
23 Pagan and gone through --

24 Q. The entire investigation?

25 A. Pretty much trash pulls. We stopped the

1 JOSEPH RECAREY - CONFIDENTIAL

2 actual physical surveillance sometime during the
3 investigation. But it would have started under
4 Pagan.

5 Q. Okay. Do you recall in what -- well, how
6 was surveillance conducted, if you recall?

7 A. I didn't conduct it personally, no. That
8 would have been under plainclothes unit team. They
9 would have sent out a vehicle and recorded vehicles
10 coming and going and actual physical surveillance.

11 Q. So physical surveillance means eyes on the
12 property, correct?

13 A. Right.

14 Q. And eyes on the property by a police
15 officer, correct?

16 A. Correct.

17 Q. And that police officer would be charged
18 with the obligation of recording the incomings and
19 outgoings of people to the property, correct?

20 A. Correct.

21 Q. Is there a log that's maintained during
22 surveillance?

23 A. I'm not sure who -- if there was a log or
24 not. I know that they set up a vehicle with cameras
25 facing -- facing Epstein's residence.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. And so these were video cameras?

3 A. Correct.

4 Q. And so whoever was coming and going,
5 whenever -- an officer saw somebody coming or going,
6 they would videotape that person; is that correct?

7 A. Or they would just leave the video
8 rolling, time lapse.

9 Q. And did you have the opportunity to
10 observe any of that video?

11 A. I did observe a couple, but the person who
12 actually set it up would review it and then submit a
13 supplement to the report.

14 Q. Okay. It's true that none of the video of
15 the surveillance led to the identification of
16 Ghislaine Maxwell as coming or leaving the house
17 during the time of surveillance, correct?

18 MS. SCHULTZ: Object to form and
19 foundation.

20 THE WITNESS: I don't know. I didn't see
21 all of the video, so I can't -- I can't attest
22 to that.

23 BY MR. PAGLIUCA:

24 Q. Okay. Did anybody report to you that
25 Ms. Maxwell was seen coming or going?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form, foundation.

3 THE WITNESS: I don't recall.

4 BY MR. PAGLIUCA:

5 Q. If someone had reported to you that
6 Ms. Maxwell was seen coming or going, you would have
7 recorded it in your Palm Beach Police Department
8 incident report, Exhibit No. 1, correct?

9 MS. SCHULTZ: Object to form and
10 foundation.

11 THE WITNESS: I would have told the
12 officer who was conducting the surveillance or
13 reviewing the video to document it in the
14 supplements.

15 BY MR. PAGLIUCA:

16 Q. And there is no documentation in the
17 supplement of Ms. Maxwell either coming or going
18 from Mr. Epstein's house during this time frame,
19 correct?

20 MS. SCHULTZ: Object to the form.

21 THE WITNESS: I don't believe so. I
22 don't -- I don't -- I don't believe so.

23 BY MR. PAGLIUCA:

24 Q. And, again, so we're on the same page,
25 when you say "I don't believe so," I interpret that

1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: Correct.

3 BY MR. PAGLIUCA:

4 Q. And none of these individuals was employed
5 as a massage therapist at the time of their alleged
6 involvement with Mr. Epstein, correct?

7 A. Correct.

8 Q. Each of these individuals, as I recall,
9 claimed to have been paid directly by Mr. Epstein or
10 Ms. Kellen, correct?

11 MS. SCHULTZ: Object to form and
12 foundation.

13 THE WITNESS: Correct.

14 BY MR. PAGLIUCA:

15 Q. Most often, these individuals, these 17
16 individuals, were paid directly by Mr. Epstein,
17 correct?

18 MS. SCHULTZ: Object to form and
19 foundation.

20 THE WITNESS: Mr. Epstein or Sarah Kellen.

21 BY MR. PAGLIUCA:

22 Q. Okay. None of these individuals identify
23 Ms. Maxwell as someone who was paying them money,
24 correct?

25 MS. SCHULTZ: Object to form and

1 JOSEPH RECAREY - CONFIDENTIAL

2 foundation.

3 THE WITNESS: I don't believe so, no.

4 BY MR. PAGLIUCA:

5 Q. And each of these individuals identified
6 receiving cash, correct?

7 MS. SCHULTZ: Object to the form.

8 THE WITNESS: Correct.

9 BY MR. PAGLIUCA:

10 Q. Each of these individuals claimed varying
11 amounts, generally between \$200 and up to \$1,000,
12 correct?

13 MS. SCHULTZ: Object to form.

14 THE WITNESS: Correct.

15 BY MR. PAGLIUCA:

16 Q. According to each of these individuals,
17 Mr. Epstein, when the massage was over, would either
18 hand them the money -- that happened according to
19 these individuals, right?

20 MS. SCHULTZ: Object to form.

21 THE WITNESS: At times, yes.

22 BY MR. PAGLIUCA:

23 Q. Or Mr. Epstein had laid out the money
24 somewhere and directed them to where to go get it,
25 correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. I don't believe clothing was seized.

3 Q. To your knowledge, did you seize any
4 property belonging to Ghislaine Maxwell from the
5 home?

6 MS. SCHULTZ: Object to form and
7 foundation.

8 THE WITNESS: I'm not sure. Not to my
9 knowledge.

10 BY MS. SCHULTZ:

11 Q. Okay. No one ever came to you and said,
12 Could you please return these items to Ms. Maxwell,
13 correct?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: No.

16 BY MS. SCHULTZ:

17 Q. All right.
18 You did that with Janush?

19 A. Yes, he had photos and --

20 Q. But nothing like that ever happened with
21 Ms. Maxwell, correct?

22 MS. SCHULTZ: Object to form.

23 THE WITNESS: No.

24 BY MS. SCHULTZ:

25 Q. Ms. Maxwell was not present when you

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Any way that you get contacted by a police
3 officer, if they put it into your database, it will
4 come up when you do the CAD search, correct?

5 A. Right.

6 Q. And that's all that came up with regard to
7 Ms. Maxwell, was her name was somewhere in the
8 system. Do you know or not know?

9 MS. SCHULTZ: Object to form and
10 foundation.

11 THE WITNESS: I don't know.

12 MR. PAGLIUCA: Okay.

13 (The referred-to document was marked by
14 the court reporter for Identification as
15 Deposition Exhibit 12.)

16 BY MR. PAGLIUCA:

17 Q. I have handed you what has been marked as
18 Deposition Exhibit 12, which I will represent to you
19 are the Plaintiff in this case, Ms. Giuffre's Rule
20 26 disclosure.

21 I want to just go through very quickly and
22 ask you if you know any of these individuals.

23 So, let's start with No. 1, Virginia
24 Giuffre. Have you ever met Virginia Giuffre?

25 A. No.

1 JOSEPH RE CAREY - CONFIDENTIAL

2 Q. Have you ever talked to her?

3 A. I don't recall.

4 Q. Do you know what information that she may
5 have that's referenced below? Conducted is the
6 subject of this action. Do you have any knowledge
7 of that?

8 MS. O'CONNOR: Object to form.

9 THE WITNESS: No.

10 BY MR. PAGLIUCA:

11 Q. Number 2, Ghislaine Maxwell, I'm going to
12 come back to her.

13 Number 3, Juan Alessi, you did interview
14 Mr. Alessi, correct?

15 A. Yes.

16 Q. I have seen a transcript of that
17 interview, and I have seen Exhibit 2, which is a
18 transcript of the interview with Ms. [REDACTED]. I want
19 to ask you a couple of questions about the
20 transcription process.

21 As I understand your testimony previously,
22 the electronic recordings are sent somewhere, you
23 don't know where, for transcription; is that right?

24 MS. SCHULTZ: Object to form.

25 THE WITNESS: I didn't request a

1 JOSEPH RECAREY - CONFIDENTIAL

2 different investigators Mr. Black uses in a
3 particular calendar year, do you?

4 MS. SCHULTZ: Object to form.

5 THE WITNESS: No.

6 BY MR. PAGLIUCA:

7 Q. And so you don't know whether Mr. Black's
8 association with this law firm was in connection
9 with Mr. Epstein's case or some other case, do you?

10 MS. SCHULTZ: Object to form.

11 THE WITNESS: I worked this case,
12 nothing -- nothing but this case for an entire
13 year. This was my only case for a year.

14 BY MR. PAGLIUCA:

15 Q. Okay. That's it?

16 A. If it walks like a duck.

17 MS. SCHULTZ: Objection.

18 BY MR. PAGLIUCA:

19 Q. Okay. So we're finished with Dershowitz.
20 Keep on going.

21 A. Number 28, obviously, [REDACTED].

22 Q. Okay. And you've talked about her?

23 A. Right.

24 Q. And, again, she never discussed Ghislaine
25 Maxwell with you, correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Right. So you're 75. So I want you -- I

3 want to take a moment and read what's under 75:

4 "Detective Recarey was the chief investigator of the
5 crimes committed at Jeffrey Epstein's Palm Beach
6 mansion." Is that true?

7 MS. SCHULTZ: Object to form.

8 THE WITNESS: Yes.

9 BY MR. PAGLIUCA:

10 Q. "And has information about Ghislaine
11 Maxwell and Jeffrey Epstein's sexual trafficking
12 conduct and interaction with underaged minors."

13 Tell me everything that you believe you
14 know about Ghislaine Maxwell's sexual trafficking
15 conduct.

16 MS. SCHULTZ: Object to form.

17 THE WITNESS: I don't.

18 BY MR. PAGLIUCA:

19 Q. So that's inaccurate, then? I mean, you
20 have no knowledge about Ghislaine Maxwell sexually
21 trafficking anybody, do you?

22 MS. SCHULTZ: Object to form.

23 THE WITNESS: Not with -- not with the
24 girls that I spoke with, no.

25

1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. PAGLIUCA:

3 Q. But that's your investigation, right?

4 A. Right.

5 Q. Okay.

6 A. Right.

7 Let's see. Seventy-six.

8 Q. Okay. And you've talked about her.

9 Whatever happened to her, do you know?

10 MS. SCHULTZ: Object to form.

11 BY MR. PAGLIUCA:

12 Q. Haley Robson?

13 A. No.

14 Q. She was never charged, as I understand it,
15 correct?

16 A. Correct.

17 Q. And after you spoke to her in connection
18 with your investigation, did you ever speak to her
19 again?

20 A. No.

21 Q. Okay.

22 A. David Rogers, 77.

23 Q. And you know him because he was identified
24 as one of the pilots for Mr. Epstein, right?

25 A. Right.

1 JOSEPH RECAREY - CONFIDENTIAL

2 in your mind, right? Correct?

3 MS. SCHULTZ: Object to the form.

4 THE WITNESS: Yes.

5 BY MR. PAGLIUCA:

6 Q. And you're a peace officer, obligated to
7 arrest when a felony is committed in your presence,
8 correct?

9 A. Correct.

10 Q. And the possession of child pornography is
11 a felony, correct?

12 A. Correct.

13 Q. And had you seen any child pornography in
14 Mr. Epstein's house when you were there installing
15 these cameras, you would have done something about
16 it, correct?

17 MS. SCHULTZ: Object for form.

18 THE WITNESS: Right.

19 BY MR. PAGLIUCA:

20 Q. You wouldn't have just walked out and
21 said, Nice pics, have a nice day, correct?

22 A. Correct.

23 Q. So is it fair to say the entire time you
24 were in Epstein's house, whether it's 2002, 2003,
25 you did not observe any child pornography, right?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to the form.

3 THE WITNESS: Not in the areas I was in.

4 BY MR. PAGLIUCA:

5 Q. You don't recall seeing any pictures of
6 naked women, do you?

7 MS. SCHULTZ: Object to form.

8 THE WITNESS: Again, I was only confined
9 to where that desk was. That's where I set up
10 the camera, and then after it was set up, I
11 left.

12 BY MR. PAGLIUCA:

13 Q. Okay. But, again, all I'm asking you is
14 wherever you were, you didn't see any pictures of
15 naked women?

16 A. Right. No, I didn't see any.

17 Q. And at the time you recall that he had
18 these surveillance cameras already installed; is
19 that true? Other cameras, the clock cameras?

20 MS. SCHULTZ: Object to form.

21 THE WITNESS: I'm not sure if he had the
22 cameras installed or not. I can't recall.

23 BY MR. PAGLIUCA:

24 Q. Why would he need your cameras if he
25 already had cameras?

1 JOSEPH RECAREY - CONFIDENTIAL

2 None of these alleged victims claimed to
3 have ever traveled with Mr. Epstein, correct?

4 MS. SCHULTZ: Object to form.

5 THE WITNESS: No.

6 BY MR. PAGLIUCA:

7 Q. No, they did not? They did not travel
8 with Mr. Epstein, right?

9 MS. SCHULTZ: Object to form.

10 THE WITNESS: I don't believe so, no.

11 BY MR. PAGLIUCA:

12 Q. None of them reported that to you?

13 A. Not reported, correct.

14 Q. None of them reported to you that they
15 ever spent the night with Mr. Epstein, did they?

16 MS. SCHULTZ: Object to form.

17 THE WITNESS: I don't believe so.

18 BY MR. PAGLIUCA:

19 Q. None of them ever reported being
20 trafficked by Mr. Epstein to other men, correct?

21 MS. SCHULTZ: Object to form, foundation.

22 THE WITNESS: I don't believe so.

23 BY MR. PAGLIUCA:

24 Q. The only other men that any of these
25 alleged victims -- the only man that any of these

1 JOSEPH RECAREY - CONFIDENTIAL

2 alleged victims ever claimed to have any contact
3 with that was sexual in nature was Mr. Epstein,
4 correct?

5 MS. SCHULTZ: Object to form and
6 foundation.

7 THE WITNESS: Yes.

8 BY MR. PAGLIUCA:

9 Q. Okay. None of these alleged victims ever
10 claimed to have been sent to another location to
11 have sex with another man, correct?

12 MS. SCHULTZ: Object to form and
13 foundation.

14 THE WITNESS: I don't believe so.

15 BY MR. PAGLIUCA:

16 Q. Meaning my statement is correct; is that
17 right?

18 MS. SCHULTZ: Object to form.

19 BY MR. PAGLIUCA:

20 Q. I'm just trying to --

21 A. Meaning I don't believe they've ever said
22 that. I don't recall any of them ever saying...

23 Q. Had they claimed that they were sent
24 somewhere else to have sex with another man, you
25 would have followed up on that, correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form.

3 THE WITNESS: Correct.

4 BY MR. PAGLIUCA:

5 Q. And none of them ever claimed to have been
6 sent to another location to give another man a
7 massage, correct?

8 MS. SCHULTZ: Object to form.

9 THE WITNESS: No, not the victims.

10 BY MR. PAGLIUCA:

11 Q. Right. That's who I'm talking about.

12 A. I believe [REDACTED] did.

13 Q. Who is an adult, right?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: Right.

16 BY MR. PAGLIUCA:

17 Q. We covered this, I believe: None of them
18 ever was on Mr. Epstein's airplane, correct?

19 MS. SCHULTZ: Object to form.

20 THE WITNESS: I believe one of the victims
21 were, but not to a private island. I think
22 they went -- they didn't go to a private
23 island; they went to some other trip.

24 BY MR. PAGLIUCA:

25 Q. I think maybe you're referring to AH, who

1 JOSEPH RECAREY - CONFIDENTIAL

2 went to New York but on a commercial flight. Does
3 that jog your memory?

4 MS. SCHULTZ: Object to form.

5 THE WITNESS: No.

6 BY MR. PAGLIUCA:

7 Q. Okay. Do you recall who it is?

8 A. It would have been FP.

9 Q. Okay. Was on Mr. Epstein's airplane?

10 MS. SCHULTZ: Object to form.

11 THE WITNESS: I believe so.

12 BY MR. PAGLIUCA:

13 Q. Would that be reflected in Exhibit 1?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: But she flew alone. It
16 wasn't like Epstein was there. She went
17 someplace else, not to his private island,
18 nothing to do with Epstein. It was something
19 she wanted to do. And I think she flew on his
20 plane, but it was, like, her by herself.

21 BY MR. PAGLIUCA:

22 Q. Alone.

23 A. Right.

24 Q. With a pilot?

25 A. Right.

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form.

3 BY MR. PAGLIUCA:

4 Q. None of the alleged victims in your
5 investigation claimed to have gone to the Caribbean
6 island of Little St. James, correct?

7 MS. SCHULTZ: Object to form.

8 THE WITNESS: No.

9 BY MR. PAGLIUCA:

10 Q. "No" meaning they never went there,
11 correct?

12 MS. SCHULTZ: Object to form.

13 THE WITNESS: Not that I'm aware of.

14 BY MR. PAGLIUCA:

15 Q. None of the alleged victims ever went to
16 Mr. Epstein's New York residence, to your knowledge,
17 correct?

18 MS. SCHULTZ: Object to form.

19 THE WITNESS: Not that I'm aware of.

20 BY MR. PAGLIUCA:

21 Q. None of them ever reported that to you?

22 MS. SCHULTZ: Object to form.

23 THE WITNESS: No.

24 BY MR. PAGLIUCA:

25 Q. Okay. And none of them ever claimed to

1 JOSEPH RECAREY - CONFIDENTIAL

2 have been outside of the country with Mr. Epstein,
3 ever, correct?

4 MS. SCHULTZ: Object to the form.

5 THE WITNESS: Not that I'm aware of.

6 MR. PAGLIUCA: Can we go off for a second?

7 Time check.

8 THE VIDEOGRAPHER: Off the record at 4:13.

9 (Thereupon, a recess was taken, after
10 which the following proceedings were held:)

11 THE VIDEOGRAPHER: On the record at 4:14.

12 BY MR. PAGLIUCA:

13 Q. Can you take a look at Exhibit 4, please?

14 A. Which one is 4?

15 Q. Four is the True Copy. That's what it
16 says at the top. Exhibit 4. Six pages.

17 A. Yes.

18 Q. Do you have that?

19 A. Yes, sir.

20 Q. There's yellow highlighting on the exhibit
21 that's in front of you.

22 Do you know how that got there?

23 A. No.

24 Q. And there's a -- there are numbers, item
25 numbers. Do you see that in the left column?

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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

I, the undersigned authority, certify
that JOSEPH RECAREY personally appeared before me
and was duly sworn.

WITNESS my hand and official seal this
24th day of June, 2016.

KELLI ANN WILLIS, RPR, CRR
Notary Public, State of Florida
My Commission No. EE911443
Expires: 2/16/16

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C E R T I F I C A T E

STATE OF FLORIDA)

: ss

COUNTY OF MIAMI-DADE)

I, KELLI ANN WILLIS, a Registered
Professional, Certified Realtime Reporter and
Notary Public within and for The State of
Florida, do hereby certify:

That JOSEPH RECAREY, the witness whose
deposition is hereinbefore set forth was duly
sworn by me and that such Deposition is a true
record of the testimony given by the witness.

I further certify that I am not related
to any of the parties to this action by blood
or marriage, and that I am in no way interested
in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set
my hand this 24th day of June, 2016.

KELLI ANN WILLIS, RPR, CRR

EXHIBIT HH

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY,
FLORIDA

CASE NO.: CACE 15-000072

EDWARDS, *et al.*,

Plaintiffs / Counterclaim Defendants,

v.

DERSHOWITZ,

Defendant / Counterclaim Plaintiff.

**AFFIDAVIT OF JUAN P. ALESSI
REGARDING KNOWLEDGE OF ALAN M. DERSHOWITZ**

A. Introduction

1. My name is Juan P. Alessi. I make this declaration voluntarily and without compensation on personal knowledge concerning Alan Dershowitz and his visits at my former employer Jeffrey Epstein's home in Palm Beach, Florida.
2. I worked for Mr. Epstein from January 1991 to December 2002 as a full-time employee performing maintenance services and then also became the manager for the home on 358 El Brillo Way in Palm Beach, Florida.
3. Since Mr. Epstein was investigated and arrested, I have spoken with police, investigators, and attorneys concerning my time working for Mr. Epstein.
4. On September 8, 2009, I gave a deposition in the case captioned *Jane Doe No. 2 v. Jeffrey Epstein*, Case No. 08-CV-80119 in which I truthfully answered the questions posed by the attorneys. I also gave a sworn statement on November 21, 2005 to

Detective Joseph Recarey of the Palm Beach P.D. during their investigation of Mr. Epstein.

5. I have reviewed the statements that Bradley Edwards and Paul Cassell attribute to me in their papers in the cases against the Government and against Mr. Dershowitz. Because I do not believe they accurately reflect the statements I previously made, I submit this affidavit to have my statements accurately reflected and made clear on the record.

B. Summary of My Knowledge of Massages at Mr. Epstein's Palm Beach Home

6. As I stated in my deposition, a massage was like a treat for all the guests at Mr. Epstein's home. Mr. Epstein usually received his massages in his private suite, but guests would also be given massages in their respective rooms or by the pool area.
7. There were between fifty (50) to one hundred (100) masseuses – mostly women but also some men - who would come to give massages during this time. I provided names of masseuses in my deposition.
8. As I stated in my deposition, I was unaware of any masseuses being under the age of 18. I believed that the females' age ranged from overage to maybe mid-forties. As I stated in my deposition, I received as a gift a massage from a male masseuse at Mr. Epstein's home in Palm Beach.
9. In my deposition, I was asked about cleaning up after massages. I stated that when I cleaned Mr. Epstein's bedroom suite, which included the bathroom of Ms. Maxwell, after massages, I would, on occasion, find vibrators and sex toys. I have specific recollection of finding these items in the sink of Ms. Maxwell's bathroom. I did not state or imply that vibrators or sex toys were found after massages in other rooms used by guests because that was not the case. Guests having massages did not have

massages in Mr. Epstein's private bedroom suite. This area was private and off-limits to guests, which I explained to the lawyers during my deposition. As I said in my deposition, massage tables were located in almost every room, including guest rooms and by the pool. I never found, and never heard anyone in the house finding, a vibrator or a sex toy in the same room where any guest, including Alan Dershowitz, had a massage.

10. The following statement made by Virginia Roberts's attorneys in a filing on January 21, 2015 is not accurate and is a misrepresentation of what I said in my deposition:
- "The private, upstairs room where Dershowitz got his 'massages' was one that contained a lot of vibrators – Maxwell had 'a laundry basket . . . full of those toys' in that room."

C. Summary of My Interaction with Alan M. Dershowitz

11. During the approximate thirteen years I worked for Mr. Epstein, I believe I saw Mr. Dershowitz visit Mr. Epstein's Palm Beach home approximately four or five times a year. I recall driving him to the airport on multiple occasions.
12. At the time, I understood that Mr. Dershowitz was a famous lawyer. His visits to the house would typically involve a group of intellectuals or business men in social, but professional type gatherings.
13. I can recall that Mr. Dershowitz had a massage on at least one occasion during a visit to Mr. Epstein's home in Palm Beach (although I cannot recall that Mr. Dershowitz received a massage on more than one occasion). I do not recall Mr. Dershowitz being massaged by anyone who I thought was less than 18 years old. I have no reason to doubt Mr. Dershowitz's statement that this massage was done by a woman named Olga who was in her forties. In fact, I do remember a masseuse named Olga that

lived in Palm Beach, though I do not know her last name. As I have said, I never saw Mr. Dershowitz around young girls. I have also explained that there were masseuses, both male and female, that were in their mid-forties.

14. I never saw Mr. Dershowitz do anything improper or be present while anyone else was being improper.
15. Before asking me about Jeffrey Epstein speaking to celebrities at the house, the attorney for "Jane Doe 102" asked me about Jean Luc Brunel, Mark Epstein, Daniel Estes, Matt Groening, and Leslie Wexner. I then listed Senator Mitchell, Prince Andrew, Princess Sarah Ferguson, Miss Yugoslavia, Miss Germany, Alan Dershowitz, Princess Diana's secretary with her children, Mr. Trump, Mr. Robert Kennedy, Jr., Frederik Fekkai, and a couple Noble prize winners as celebrities that I had seen while working for Mr. Epstein. I also mentioned a reunion of Nobel prize winners that was held at the house, and that I met President Clinton at Mr. Epstein's plane the last month that I was working for Mr. Epstein.

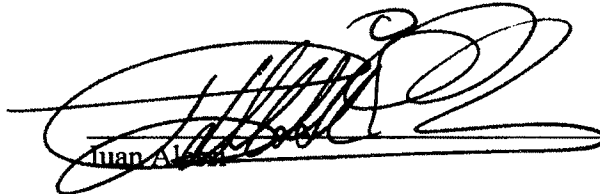
C. Summary of My Interaction with Virginia Roberts

16. The first time I saw Virginia Roberts was at Mar-a-Lago where I believed she worked in the spa. I only recall seeing Virginia Roberts come to Mr. Epstein's house during the last year that I worked for Mr. Epstein. During this time, I believe she visited Mr. Epstein's home in Palm Beach two or three times a week.
17. I never saw any photographs of Virginia Roberts in Mr. Epstein's house. I was shown a photo of Virginia Roberts during my deposition, and I recognized the woman in the photo as Virginia Roberts.
18. As I stated in my deposition, I am not sure whether Virginia Roberts came to the house when Prince Andrew was there.

19. I was never asked by any attorneys if Virginia Roberts came to the house when Mr. Dershowitz was there. If I had been asked, I would have answered that I never saw Virginia Roberts at the house when Mr. Dershowitz was there.
20. The following statement made by Virginia Roberts's attorneys and their own attorney in a filing on December 4, 2015 is not accurate and is a misrepresentation of what I said in my deposition: "Alessi was able to identify a photograph of Ms. Giuffre as someone who was at the mansion at the same time as Dershowitz."
21. As far as I can recall, since I gave my deposition in 2009, I have never been asked by Brad Edwards or Paul Cassell about my knowledge regarding Virginia Roberts or Alan Dershowitz or about my 2009 deposition testimony.

I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this affidavit and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

Dated: January 13, 2016



Juan Alessi

STATE OF FLORIDA
COUNTY OF PALE BEACH

Sworn to or affirmed and signed before me on JANUARY 13, 2016
by JUAN PATRICIO, who provided his driver's license. ALESSI

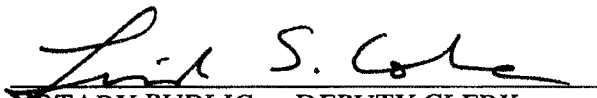

NOTARY PUBLIC or DEPUTY CLERK
LINDA S. COHEN
[Print, type, or stamp commissioned name of notary or clerk.]



EXHIBIT II

1 IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
2 IN AND FOR BROWARD COUNTY, FLORIDA
3 CASE NO. 15-000072

4 BRADLEY J. EDWARDS and PAUL G.
5 CASSELL,

6 Plaintiffs,

7 - vs -

CONFIDENTIAL

8 ALAN M. DERSHOWITZ,

9 Defendant.

-----/

10 VIDEOTAPED DEPOSITION OF VIRGINIA ROBERTS GIUFFRE

11

12 Saturday, January 16, 2016
13 9:07 a.m. - 2:48 p.m.

14 401 East Las Olas Blvd., Suite 1200
15 Fort Lauderdale, Florida 33301

16

17

18 Reported By:

19 Deborah A. Harris, Court Reporter
20 Notary Public, State of Florida
21 Phone - 305.651.0706

22

23 Job No. J0277789

24

25

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**GIUFFRE005093
CONFIDENTIAL**

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1 ALSO PRESENT

2 Edward J. Pozzuoli, Special Master
 3 Robert Pacheco, Videographer
 4 Ryan Kick, Videographer
 5 Bradley J. Edwards
 6 Paul G. Cassell
 7 Alan M. Dershowitz
 8 Brittany N. Henderson, Esq.
 9 Meridith Schultz, Esquire

10 - - -
 11 I N D E X

12 WITNESS DIRECT CROSS REDIRECT RECROSS

13 Virginia Roberts Giuffre

14 By Ms. Borja 5

15 By Mr. Scarola 201

16 By Ms. Borja 204

17 - - -
 18 E X H I B I T S

19 DEFENDANT VR EXHIBITS

FOR ID

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30 REPORTER'S NOTE: Exhibit 5 marked confidential, sealed,
 31 and retained by the Special Master.

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1 MR. SCAROLA: It is a minor discrepancy,
2 but I think you read it as when she was a minor
3 and it's while she was a minor.

4 BY MS. BORJA:

5 Q. While she was a minor. Do you see where
6 I'm reading starting in the third line?

7 A. Yes.

8 Q. Is that allegation true?

9 A. Yes.

10 Q. If you go to page 6 of the document, do you
11 see the paragraph that's starts, Epstein also trafficked?

12 A. Yes.

13 Q. Is says Epstein also trafficked Jane Doe #3
14 for sexual purposes to many other powerful men including
15 numerous prominent American politicians, powerful
16 business executives, foreign presidents, a well-known
17 prime minister and other world leaders. Do you see that?

18 A. Yes.

19 Q. Is that allegation true?

20 A. Yes.

21 Q. The reference there to foreign presidents,
22 do you see that?

23 A. Yes.

24 Q. You were sexually trafficked to foreign
25 presidents?

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GIUFFRE005102
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1 A. No.

2 Q. So that's not true, you were not sexually
3 trafficked to foreign presidents?

4 A. I don't know what foreign president you're
5 talking about.

6 Q. Have you ever been sexually trafficked to
7 any foreign president?

8 MS. MCCAWLEY: I'm going to allow you to
9 ask that question, but with respect to specific
10 identification of an individual we're not going to
11 do that. At this point she has.

12 MS. BORJA: Counsel, your objection has
13 been made. No speaking objections, please. Let's
14 move on.

15 MS. MCCAWLEY: I can make my record, and my
16 record is she's not going to be speaking with
17 respect to individuals' names that are named in
18 generalities in this document.

19 SPECIAL MASTER: Objection overruled. You
20 can answer.

21 A. I understand well-known prime ministers and
22 other world leaders; as far as foreign presidents, I'm
23 not too sure, I don't know.

24 Q. Have you ever met any foreign presidents?

25 A. Foreign presidents as in overseas?

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GIUFFRE005103
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1 Q. Sure, okay, overseas.

2 A. No.

3 Q. Have you ever met any foreign presidents
4 from countries not overseas such as Canada or Mexico?

5 A. No.

6 Q. So you were not sexually trafficked to any
7 foreign presidents; is that correct?

8 A. As far as I know right now, yes.

9 Q. It's correct that you were not sexually
10 trafficked to them, right?

11 A. You've asked me this three times and I'm
12 telling you.

13 Q. Okay. A well-known prime minister. Were
14 you sexually trafficked to a well-known prime minister?

15 A. Yes.

16 Q. Who was that?

17 MS. MCCAWLEY: I'm going to object to this
18 line of questioning. This has to do with safety
19 concerns for her.

20 MS. BORJA: Counsel, this is under seal.
21 You can answer.

22 MS. MCCAWLEY: No, she's not going to
23 answer.

24 SPECIAL MASTER: Hang on one second.

25 MS. MCCAWLEY: Let me make my objection.

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1 SPECIAL MASTER: Okay. I can't twist her
2 arm and force her so we'll deal with it.

3 BY MS. BORJA:

4 Q. Okay. Other world leaders, what other
5 world leaders were you sexually trafficked to?

6 MS. MCCAWLEY: We have the same objection.

7 SPECIAL MASTER: And I would have the same
8 ruling based upon the arguments.

9 MS. MCCAWLEY: Let me just make my record.
10 To the extent that there's a name of an individual
11 that you can reveal that you do not feel would
12 harm your physical safety, you're welcome to
13 reveal them. Anybody else, you don't have to
14 reveal at this time and we'll take that to Judge
15 Lynch.

16 A. Okay. Prince Andrew for one.

17 Q. Other than Prince Andrew?

18 A. There is another individual that I honestly
19 do not know his name.

20 Q. What country is he from?

21 A. I'm not too sure, he spoke in a foreign --
22 he did speak foreign tongue, he spoke English as well,
23 but I'm not too sure where he was from.

24 Q. How do you know he is world leader?

25 A. I was introduced to him as a prince.

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GIUFFRE005107
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1 Q. Okay. Did he have security with him?

2 A. I'm sure he did somewhere around, but not
3 when I was with him.

4 Q. Did you see security?

5 A. No.

6 Q. Did you -- where were you when you met him?

7 A. On this occasion the South of France.

8 Q. Are there witnesses to you being sexually
9 trafficked to this prince?

10 A. Yes.

11 Q. Name them.

12 A. Jeffrey Epstein, Ghislaine Maxwell.

13 Q. Anyone else?

14 A. There was a whole bunch of people in the
15 room so of course.

16 Q. Was this an orgy?

17 A. No.

18 Q. Who else was in the room?

19 A. I can't name them all, there was a lot.

20 Q. Name as many as you can name?

21 A. I don't know their names. I can't name
22 their names.

23 Q. They were present during sexual activity?

24 A. They were present before the sexual
25 activity and then I went to have sexual activity with him

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GIUFFRE005108
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1 alone.

2 Q. So he's the only witness to your sexual
3 activity, the prince?

4 A. On the instruction of Epstein and
5 Ghislaine, yes.

6 Q. Where in the South of France were you?

7 A. I don't know.

8 Q. Were you on a boat, were you in a house?

9 A. We were at a like a cabana, not cabana,
10 like a resort, but it was a big party.

11 Q. Who was throwing the party?

12 A. I don't know. I was just brought there.

13 Q. You also refer to powerful business
14 executives. What powerful business executives were you
15 sexually trafficked to?

16 MS. MCCAWLEY: Again, to the extent you can
17 reveal somebody without a safety concern you're
18 welcome to do that.

19 SPECIAL MASTER: Well, again --

20 MS. MCCAWLEY: Right. I understand.

21 SPECIAL MASTER: Same objection, same
22 ruling.

23 A. George Mitchell.

24 Q. When were you sexually trafficked to George
25 Mitchell?

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1 Q. Do you have the originals?

2 A. Again, between the FBI and giving them to
3 my lawyers and Sharon Churcher, the circulation, I'm not
4 too sure if I have the originals. I know I have copies.
5 So I'm not too sure if they're the originals.

6 Q. The booklet that you gave pages from to Ms.
7 Churcher where is that booklet?

8 A. Burned.

9 Q. When did you burn it?

10 A. In, I think it was 2013. Me and my husband
11 had a bonfire.

12 Q. What did you put in the bonfire?

13 A. Any kind of memories that I had written
14 down about all the stuff going on.

15 Q. Had you written anything about Professor
16 Dershowitz?

17 A. He could have been there, yes.

18 Q. And you burned that?

19 A. I wanted to burn my memories. I wanted to
20 get rid of it. It was very painful stuff.

21 Q. Other than what you had written down did
22 you burn anything else? I don't mean the wood, when you
23 talk about burning your memories, what were you burning?

24 A. I was burning like memories, thoughts,
25 dreams that I had, just everything that was kind of

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1 affiliated with the abuse I endured, and there was a lot
2 of it in there. My husband is pretty spiritual so he
3 said the best thing to do would be burn them.

4 Q. Is there anything you decided to keep and
5 not burn?

6 A. Just the photographs.

7 Q. Anything else that you can think of?

8 A. Photographs, that's it.

9 Q. Approximately when in 2013 was this
10 bonfire?

11 A. I don't know what month it was.

12 Q. Did you do it outside?

13 A. Yeah, it was outside. I wasn't going to do
14 it in my living room.

15 Q. Did it feel good to be close to the fire
16 because it was cold out or was it a summertime bonfire?

17 A. I believe I had just bought my house in
18 Titusville, Florida. I bought my house in, I think, I
19 either got it October or November of 2013. It would have
20 been around probably November.

21 Q. Why did you decide to keep the photos?

22 A. They're evidence.

23 Q. Do you have any photographs of yourselves
24 with Professor Dershowitz?

25 A. No.

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1 Beach, I've seen him in New York. So I mean, if we're
2 going to pin point how many times I've seen him or the
3 next time I saw him after that I don't know.

4 Q. Then tell me -- let's do it this way, what
5 was the most recent time that you recall having sex with
6 Professor Dershowitz?

7 MS. MCCAWLEY: Objection.

8 SPECIAL MASTER: You can answer.

9 A. The first time I recall having sex with
10 Professor Dershowitz was in New York.

11 Q. My question was, the most recent time now.
12 What's the most current, most recent memory of having sex
13 with Professor Dershowitz?

14 MS. MCCAWLEY: Objection. Just so I'm
15 clear, you're going backward?

16 MS. BORJA: Correct.

17 MS. MCCAWLEY: The last time.

18 A. The last time that I remember having sex
19 with him? Okay. I believe it was on an airplane.

20 Q. Where were you going?

21 A. On, I believe it was Massachusetts. I
22 don't know. It's very hard for me to remember exactly
23 where we were going, what were the circumstances.

24 Q. So that's the time you testified about
25 earlier?

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GIUFFRE005177
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1 age of 30?

2 Q. That were providing massages to Jeffrey
3 Epstein?

4 A. Just the male that was teaching me on the
5 USVI and Sheridan, but she was also involved in sexual
6 acts. She wasn't over the age of -- she could have been
7 around 30, but she would have been over 30.

8 Q. Did you keep a list of the masseuses who
9 came to Epstein's properties?

10 A. No.

11 Q. Did some of them come only once?

12 A. Uh-huh.

13 Q. Are there some that came when you weren't
14 there?

15 A. I wasn't there, how am I to know.

16 Q. You don't know if any came as a masseuse
17 while you were not at Jeffrey Epstein's property?

18 MS. MCCAWLEY: Objection, asked and
19 answered.

20 A. I wasn't there so I couldn't have.

21 Q. What's the sixth incident that you say
22 happened where you were sexually trafficked to Professor
23 Dershowitz?

24 A. We've talked about New York, we talked
25 about Palm Beach, New Mexico, U.S. Virgin Islands, talked

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GIUFFRE005202
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1 about we took the airplane?

2 Q. Yes.

3 A. There was an instance in a car, but it was
4 more -- it wasn't intercourse, it was more --

5 MS. MCCAWLEY: Use a term you're
6 comfortable with.

7 A. More oral is the good term to use, oral
8 sex.

9 Q. Where were you? Where was his car, what
10 city, what state, what jurisdiction? Where were you?

11 A. This was in Massachusetts. It was a black
12 limousine.

13 Q. Who else was in the car other than yourself
14 and Professor Dershowitz?

15 A. Jeffrey Epstein and another young girl.

16 Q. How many people participated in the sexual
17 activity in the car?

18 A. Including myself?

19 Q. Uh-huh.

20 A. Four.

21 Q. Where was everybody in the car?

22 A. Sitting down.

23 Q. Were people -- was this a town car, was
24 this a limousine?

25 A. Like a long limousine.

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1 Q. Where was the car going?

2 A. To Mr. Dershowitz' house.

3 Q. Where was it coming from?

4 A. An airport.

5 Q. When was this?

6 A. I don't know.

7 Q. What's your best recollection?

8 A. It wasn't snowing. It wasn't hot. So I
9 would like to say -- I'm trying to think of the trees
10 around, but I don't know, maybe spring.

11 Q. Why were you going to Professor Dershowitz'
12 house?

13 A. Jeffrey and him were doing some business.
14 They were doing something at his house. Nothing sexual
15 happened at his house.

16 Q. Did you go in Professor Dershowitz' house?

17 A. Yes, I did.

18 Q. How long were you there?

19 A. Not even twenty minutes, half an hour.

20 Q. What did you do while you were in the
21 house?

22 A. I sat in, I don't know, a foyer with
23 another girl and Jeffrey and Dershowitz went to a
24 different part of the house. There was a desk there and
25 we just sat, not sat, stood in the foyer.

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GIUFFRE005204
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1 Q. Who was this other girl?

2 A. I don't know who she is.

3 Q. Had you ever met her before?

4 A. No.

5 Q. When you were coming from the airport had
6 you flown in?

7 A. Yes, me and Jeffrey and the girl had flown
8 in, Dershowitz had not.

9 Q. How did he get into the limousine?

10 MS. MCCAWLEY: Objection.

11 SPECIAL MASTER: You can answer.

12 BY MS. BORJA:

13 Q. Where did he get into the limousine?

14 A. At the airport.

15 Q. He was not on a flight with Mr. Epstein?

16 A. Not on this occasion.

17 Q. Did you tell anybody about this incident in
18 the car?

19 A. Like anybody that I know personally?

20 Q. Anybody in the world?

21 MS. MCCAWLEY: Objection to the extent you
22 relayed something to your lawyer. You can say
23 that you told your lawyers but you can't discuss
24 what you said.

25 SPECIAL MASTER: Other than --

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1 A. No, I told my lawyers.

2 Q. Did you tell anybody about it closer in
3 time to the event?

4 A. Like my boyfriend or something like that,
5 no.

6 Q. After you left Professor Dershowitz's house
7 where did you go?

8 A. Back to the airport.

9 Q. Where did you fly in from?

10 A. I believe it was New York.

11 Q. When you went back to the airport where did
12 you go?

13 A. I believe, see, that's the hard thing. I
14 want to say either New York or Palm Beach. I'm no 100
15 percent sure.

16 Q. So I understand the time frame, did you fly
17 in on a private jet or commercial?

18 A. Private.

19 Q. You flew out again on private?

20 A. Yes.

21 Q. So the time frame is that you and Jeffrey
22 were on the plane?

23 MS. MCCAWLEY: Objection.

24 A. Yes.

25 MS. MCCAWLEY: Objection, mischaracterizes

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GIUFFRE005206
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1 the testimony. Go ahead.

2 A. Yes, me and Jeffrey were on the plane
3 together.

4 Q. And the girl was on the plane?

5 A. Yes.

6 Q. Anybody else?

7 A. The pilots.

8 Q. So the three of you took the flight,
9 correct?

10 A. Yes.

11 Q. And you flew into an airport in
12 Massachusetts?

13 A. Yes.

14 Q. Then you took a limousine to the
15 Professor's house and you were there for about ten
16 minutes, is that right?

17 MS. MCCAWLEY: Objection. Go ahead.

18 A. About 20, 25 minutes. I didn't look at my
19 watch.

20 Q. A very brief period of time?

21 A. Very brief.

22 Q. And then you went back to the airport and
23 you flew out?

24 A. Yes.

25 Q. And you flew back either to New York or to

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GIUFFRE005207
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1 A. Besides what's in these?

2 Q. Did you ever look to see if you had any
3 personal notes in your writing that pertain to Professor
4 Dershowitz?

5 A. Like from my old journal, the one that I
6 burned?

7 Q. From anywhere. Did you ever make an effort
8 to look?

9 A. Dershowitz could have been in my journal,
10 he could have been. We're talking about an 85 page, if
11 not more, you know, things that I had written to get my
12 story out of my head and into pages; and yes, Dershowitz
13 could have been in there, but that's up in the clouds
14 now, bonfire.

15 Q. That's what you call your journals, what
16 you burned, right?

17 A. Yes.

18 Q. And you wrote that journal in order to
19 collect your thoughts?

20 A. To get everything out of here and on to
21 paper.

22 Q. Have you made any other notes, though,
23 since then to help you when you think of things?

24 A. Yes, sometimes like I said, sometimes when
25 I read my affidavits and stuff like that, you know, and I

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GIUFFRE005286
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1 think of something else like a description of something
2 that I forget about, you know what I mean, then yeah,
3 I'll go back and I'll write it in the journal, you know,
4 for instance, you know, what another girl would have
5 looked like. Even though I can't identify her name or
6 her age or anything like that, but I do remember like
7 flashes of blonde, little things like that, but nothing
8 -- I don't have any more journals.

9 Q. But those notes, they help your memory?

10 A. Sometimes. I'm a very visual person.

11 Q. And they help you with your affidavits?

12 A. No, they don't help me with my affidavits,
13 my affidavits are already done, I just go back and it
14 helps my memory. It helps me bring stuff out.

15 Q. What do you do with those notes?

16 A. Nothing, literally nothing. They're in a
17 notebook that if I need to write it down. I have a dream
18 notebook as well where I'll just write down my dreams and
19 stuff. I do nothing, no one is seeing it.

20 Q. You read it? You keep it?

21 A. Yeah, I keep it.

22 Q. Okay. Have you gone back and read that
23 recently?

24 A. No.

25 Q. Okay. You continue to make entries into

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GIUFFRE005287
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1 it?

2 A. Not so much about Dershowitz. It's mostly
3 like feelings, dreams, you know, past things that I've
4 gone through. Like I said, not so much pertaining to
5 Dershowitz himself.

6 Q. And that's separate from your dream book?

7 A. No, it's all in one.

8 Q. Is it a spiral bound notebook?

9 A. Yes, it's just a cheap, like, actually it's
10 in my kid's closet.

11 Q. At this point in time are you angry with
12 Mr. Epstein?

13 A. Furious.

14 Q. Are you angry with Professor Dershowitz?

15 A. Absolutely.

16 Q. Are you angry with famous politicians?

17 A. I'm angry with anybody who has it in their
18 mind that they can hurt and abuse a minor child and
19 continue to lie about getting away with it and that what
20 they've done is okay and they can continue to harass
21 victims, yes, I'm furious.

22 Q. Are you angry with Professor Dershowitz for
23 his role in representing Jeffrey Epstein in the criminal
24 action?

25 A. Do I think he played a big part getting him

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C E R T I F I C A T E O F O A T H

STATE OF FLORIDA,
COUNTY OF DADE,

I, Deborah A. Harris, the undersigned
authority and Notary Public certify that VIRGINIA ROBERTS
GIUFFRE personally appeared before me and was duly sworn
on the 16th day of January, 2016.

Sworn to before me this 20th day of
January, 2016.

Deborah A. Harris, Court Reporter
Notary Public - State of Florida
My Commission No. FF 246867
My Commission Expires: October 31, 2019
Job No. J0277789

1 REPORTER'S CERTIFICATE

2
3 I, Deborah A. Harris, Florida Professional
4 Court Reporter and Notary Public in and for the State of
5 Florida at Large, do hereby certify that I was authorized
6 to and did report said deposition in stenotype; and that
7 the foregoing pages 1 through 216 are a true and correct
8 transcription of my shorthand notes of said deposition.

9 I further certify that said deposition was
10 taken at the time and place hereinabove set forth and
11 that the taking of said deposition was commenced and
12 completed as hereinabove set out.

13 I further certify that I am not an attorney
14 or counsel of any of the parties, nor am I a relative or
15 employee of any attorney or counsel of party connected
16 with the action, nor am I financially interested in the
17 action.

18 The foregoing certification of this
19 transcript does not apply to any reproduction of the same
20 by any means unless under the direct control and/or
21 direction of the certifying reporter.

22 DATED this 20th day of January, 2016.

23
24 _____
25 Deborah A. Harris, Court Reporter
Job No. J0277789

EXHIBIT JJ

BOIES, SCHILLER & FLEXNER LLP

401 EAST LAS OLAS BOULEVARD • SUITE 1200 • FORT LAUDERDALE, FL 33301-2211 • PH. 954.356.0011 • FAX 954.356.0022

CONFIDENTIAL/SEALED DEPOSITION
SPECIAL TREATMENT REQUIRED

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

February 10, 2016

VIA E-MAIL & FEDERAL EXPRESS

Esquire Solutions
PRODUCTION DEPARTMENT
101 Marietta Street
Atlanta, Georgia 30303
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**Re: Confidential/Sealed Deposition Transcript, Job No. J02777789
(Errata changes to be treated in same manner).**

To Whom It May Concern:

Attached please find the errata changes for the Videotaped Deposition of Virginia Roberts Giuffre taken January 16, 2016. This transcript has been designated as Confidential and has been sealed by the Court. Please ensure that all materials including transcript, errata changes and video tape are treated accordingly.

If you have any questions regarding the errata changes or treatment of confidential/sealed materials, please do not hesitate to contact me at (954) 356-0011.

Sincerely,



Sigrid S. McCawley

SSM:sp
Enclosures

Confidential/Sealed Transcript Pursuant to Court Order
Videotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)
Job No. J0277789

215

1 DEPOSITION ERRATA SHEET

2

3 Assignment no: J0277789

4 Bradley J. Edwards and Paul G. Cassell

5 vs.

6 Alan M. Dershowitz

7

8 DECLARATION UNDER PENALTY OF PERJURY

9

10 I declare under penalty of perjury that I
11 have read the entire transcript of my videotaped
12 deposition taken in the captioned matter or the same has
13 been read to me, and the same is true and accurate, save
14 and except, for changes and/or corrections, if any, as
15 indicated by me on the DEPOSITION ERRATA SHEET hereof,
16 with the understanding that I offer these changes as if
17 still under oath.

18

19 signed on the 11 day of February
20 2016.

21

22

23

24

25


VIRGINIA ROBERTS GIUFFRE

**Confidential/Sealed Transcript Pursuant to Court Order
Videotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)
Job No. J0277789**

DEPOSITION ERRATA SHEET

Page No. 6 Line No. 17

Change to: "Yes. I signed the subpoena duces tecum."

Reason for change: Did not initially recognize the document

Page No. 6 Line No. 20

Change to: "No. My lawyers worked with me to collect documents and my understanding is that we turned those documents over to Dershowitz's counsel prior to the deposition."

Reason for change: Clarification of answer

Page No. 9 Line No. 9

Change to: "Yes."

Reason for change: Did not initially recognize the document

Page No. 11 Line No. 1

Change to: "Yes."

Reason for change: Misunderstood the question

Page 11 Line Nos. 4-5

Change to: "I'm confused. I don't know what foreign president you're talking about."

Reason for change: Misunderstood the question

Page No. 11 Line No. 23

Change to: "I understand well-known prime ministers and other world leaders; as far as foreign presidents, I believe so."

Reason for change: Misunderstood the question

Page No. 12 Line No. 2

Change to: "Yes, assuming South America is considered overseas."

Reason for change: Misunderstood the question

Page No. 12 Line No. 8

Change to: "As far as I know right now, yes, I was."

**Confidential/Sealed Transcript Pursuant to Court Order
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Reason for change: Misunderstood the question

Page No. 38 Line No. 11

Change to: "I'll continue with the list here. Nadia Marcinkova I was not sent to her, but she was part of it with Jeff Epstein. Others on the list include Marvin Minsky and Tom Pritzker."

Reason for change: Clarification of answer

Page 38 Line 19

Change to: "Off the top of my head, once, but it could have been more."

Reason for change: Clarification of answer

Page No. 38 Line No. 21

Change to: "I believe Tom was at Mexico. I may have also been with him in other places."

Reason for change: Clarification of answer

Page No. 41 Line No. 8

Change to: "On an airplane and in a limo."

Reason for change: Clarification of answer

Page No. 41 Line No. 10

Change to: "One, each time."

Reason for change: Clarification of answer

Page No. 41 Line No. 12

Change to: "On airplane, blond, young."

Reason for change: Clarification of answer

Page No. 98 Line No. 16

Change to: "As you can see in that answer I'm not even sure. It wasn't six months, but between six months and a year which is why I'm saying nine months. It was an assumption. It could have been six weeks."

Reason for change: Clarification of answer

**Confidential/Sealed Transcript Pursuant to Court Order
Videotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)
Job No. J0277789**

Page No. 190 Line No. 22

Change to: "No, other than maybe you showing it to me today. It's in my pile. It's not in my pile, is it? I don't know. I haven't seen it. I was served with the subpoena, and I signed for it, and I reviewed it at that time."

Reason for change: Clarification of answer

Page 191 Line 5

Change to: "Why would I do – no. I did collect documents and gave them to my lawyers in response to this subpoena. And my understanding is those documents were produced."

Reason for change: Misunderstood the question

Page 191 Line 20

Change to: "Yes, but I did not have any pictures of myself with Professor Dershowitz."

Reason for change: Misunderstood the question

EXHIBIT KK

The Billionaire's Playboy Club

By Virginia Roberts

To my true love Robbie who believes in me every step of the way and to all of my children, you are all my very inspirations!

Chapter1

Every single person in this shared world together has a unique story of his or her own to tell, this one is mine. It was coming up to my third night camping out at Miami Beach in the summer of 1997. I was thirteen years old and hiding from a world full of hurt. Sitting on the shoreline for hours watching the sunset fall deeper into the horizon, my eyes were glazed over with tears, not from being wind-whipped by the rough sea breeze, but from reflecting on the abuse I encountered as a young girl and how everyone in my life who was supposed to be there for me had now turned their backs on me in abandonment. My fears crept up and the excitement of escaping all of them faded now realizing how alone I really was now, and for the hunger that was paining my belly. At this point, with nowhere to go and only time to waste, I wiped the tears from my eyes and set out to find an empathetic person that I could manage to get dinner money from. If not, it wouldn't have been the first time I had gone hungry for the night. I walked to the nearest bus stop and asked a handful of people for any spare change, none of whom that could help me. Sitting down on a nearby curb disappointed in grief of my current state, I put my head into my knees and began to sob.

Out of nowhere, it seemed, a black stretch limousine turned the corner and stopped in front of the curb where I had been hopelessly lost. The back door opened to reveal a heavy weight and balding, old man with a big cheesy smile. Neatly dressed in black trousers and a collared shirt, he was sitting next to a striking young, blonde girl, drop dead beautiful and dressed in a foxy red mini dress she looked like a model just stepping off a runway.

Their smiles greeted me warmly and he kindly asked, "What is such a sweet little girl like you doing sitting alone on the street looking so upset?" Shocked from this strangers concern I was hesitant in telling him the truth. Reluctantly I decided to tell him that I was a runaway, not from around here and really hungry. Hoping at most, I would get some money for food from him. He instantly displayed a chilling excitement and offered me to come into his car so we could talk some more. That

should've been my first queue to get out of there quick but with no where to go, and so naïve I didn't realize how much worse it could get. Setting foot into that limo, I made my first entrance into a world that would entrap me for many years to come.

He introduced himself immediately as Ron Eppinger, a businessman and owner of a successful modeling agency, called "Perfect 10". Flaunting his oozing wealth by introducing one of his many girlfriends, the beauty next to him was Yana, a supposed model from the Czech Republic who looked like she could be in her early twenties with the heavy load of makeup she was wearing, but really was only in her late teens. She kissed me on both cheeks and politely said "Hello" in a thick Czech accent, making me feel a little more at ease. Convinced it couldn't be that bad there was another girl in the car, right? I couldn't be more wrong.

What he didn't tell me to begin with was that his modeling agency was only posing for an undercover trade. By the time I found out I thought it was too late to run. His business was really an illegal immigrant trafficking ring of young women mostly consisting of underage girls that he was using as escorts to make him uber rich. Only available to a selective clientele costing them anywhere from \$1000.00 and over per hour of erotic entertainment, the girls were trained to fulfill every sexual desire asked of them, no matter how bizarre the requests might be. The high paid escorts, for Ron's super rich clientele, such as Yana and many other charismatic beauties would only benefit a fraction of their earnings for themselves, Ron reaping in the majority of the financial rewards and being they were all illegal immigrants they were further trapped by his enslavement.

I proceeded to introduce myself, besides what he had found out about me on the curbside. Telling him my name and a little about how I ended up on the streets explaining that I could take care of myself and didn't need my family or anyone to look after me anymore. Looking back later in life I can now admit I was in a terrible state, but being such a headstrong teenager, I refused to give in. He asked my age and I told him I was sixteen at first. He coyly replied, "Are you sure? I think you could be telling me a fib? How old are you... really? I wont be mad" Being a terrible liar, I knew had been caught out and couldn't deny it any further. I told him the truth and he chuckled then paused and answered in a very serious tone "As long as you never lie to me again I will take you in" Right away I pondered to myself what did he mean...take me in?

He gave the driver the location of our destination and rolled the middle window back up to then tell me a story of how his daughter had passed away seven years ago from a horrific car accident in which four other teens were killed and he has never gotten over it. I reacted with sheer

of life was just mind blowing to even comprehend at first. With such a new outlook of the world to try and grasp at my young age I was listening to every word spoken to me with such attentiveness, I was going to try and model what I was observing from the girls. I justified their way of thinking in my head for now, thinking if all these girls seem happy enough, why couldn't I try to be, it was this or the streets for me.

Ron came back for me not long after our conversation got out of hand and took me to a bathroom down the hall. He opened the tap and filled a small plastic cup with water and handed me two small blue oval pills. Telling me to take them both as they would help me to relax a little bit more. I swallowed the pills just following his orders. I put the cup on the counter top and turned back around to face him. Backing me up against the wall and now cornered by this large man I felt his slithering hands began to creep under my shirt, writhing my skin. I closed my eyes tightly and turned my head away from him, hoping he would take my actions as a sign of being extremely uncomfortable but that wouldn't bother him at all. He was half enjoying my reaction from the smug look on his face, and persisted through it.

Continuing to undress my clothes he said he wanted to look me over and clean me up. It was so humiliating having to expose myself to this ageing man and now I knew he was going to end up with his hands and whatever else all over me. All too soon I hated to be right, as I stood naked before his widened eyes, he told me "you're a hairy bugger I'll have to shave you right up young lady", and I didn't know he wasn't just talking about my legs. Standing with my legs wide apart while this man coaxed me through the entire ordeal of shaving, his hands made me feel so dirty. "Have I lost my mind?" I thought to myself but I had to play nice until I had an opportunity to get away, this was not as fun as the girls made it out to be after all, this was utterly disgusting. I had no idea what was going to happen next with this guy, and due to whatever pharmaceuticals he gave me, I still don't know to this day.

Waking up the next morning my head was pounding in an agonizing thumping pain and I was so thirsty. The satin sheets thankfully covered my body, which was still nude from the night before, and I could hear hushed voices standing over the bed where I was pretending to still be asleep. Listening in on their conversation I kept my eyes shut. I knew Ron's voice from two of the men but not recognizing the other guys I just stayed quiet hoping they'd soon leave. Ron was telling the other man what atrocities he got up to the night before with me and I heard him say, "Doesn't she even look like an angel the way she sleeps? She's my own little angel!" He exclaimed proudly. I opened my eyes and rolled over to face them both having to wrap the sheets over my body, really not knowing what to say except "Good-morning" in a bluishful tone. Ron

introduced me to his business partner and told to go get dressed. He had my whole day planned out for me already. Booked into get my hair colored, a much lighter tint of blonde, and afterwards a day of shopping with the girls I was becoming exactly what he wanted me too, a carbon copy of the teenage Barbie... only I wasn't plastic and came with many benefits.

Days turned into weeks, being a servant to the sexual desires of this distorted pervert. I dreamt of escaping but where would I go and how would I get away from Ron with him controlling my every second of my day. Separating myself from the other girls being so uncomfortable with enduring the everyday occurrences I was longing for the solitude of the beach again. They were training me up to be an escort prodigy or something like it. Outrageous orgies were conducted as my lessons with the girls teaching me all of their tricks in the game, it was all for the sake of men's perverted fantasies, they didn't get anything from being sexually exploited and molesting each other, except getting paid for it. Everything from oral sex too penetration with toys, I was expected to not only to join in but even perform ludicrous acts of hedonism.

I was Thirteen years old and had never heard the terminology of these sexual acts before, and definitely shouldn't have been learning them first hand. Thrown into a world of chaos, I didn't know what to do except be as compliant as possible, even when asked to do the most degrading tasks. The excitement of the lifestyle he offered quickly diminished once I had to pay so dearly for it. The girls that subdued to this lifestyle and enjoyed it definitely put on a good act, but no little girl with hopes and dreams of their untainted future, turns to her mother and say's "one day I dream of being a prostitute, passed around from man to man, only to grow older regretting so much of my life" It was all a part of an illusion that Ron painted for us that made it seem so alluring in the first place.

Spending my days with Ron, he took advantage at every chance given. Even in his convertible with the top down I would be forced to go topless while he drove around, when I asked him why one day, it was supposedly so I could maintain an even suntan, but I knew it was his way of showing off his treasures. It was a far cry from the simple country life I had been raised in. Wearing designer miniskirts and tops that always revealed too much, of course due to Ron and the girls determining everything I wore, ate, or spoke. We would spend our days at hair laser clinics, shopping, tanning beds, and eating as little as possible. Through the nights we were expected to become party animals and greet Ron's clientele with the upmost flirtatious attention and doting as possible. Then whether we were out for dinner, at a party, or at a club, the men would choose his girl and take her home. Every girl had a different price and so did the charges depending on the various clienteles but Ron always kept me for himself.

sympathy and gave him my pity, believing this man had a heart. His next proposal was eerie, he said, "If you wanted, I can be your new Daddy. Someone to take care of you and you'll be my new baby forever" he stroked my hair such as a caring parent would comfort a scared child. A part of me wanted to accept his words and believe he really could feel that way, and then I also considered how hard it was living on the streets. In the end I convinced myself this would be the lesser of two evils.

The car stopped at a plaza on the water, surrounded by little boutique shops, restaurants, and little stalls with items for sale like sunglasses and costume jewelry. I didn't know what to say or do or how to act, it all happened so fast I just went along with everything he said, for now.

We went to a take out restaurant and ate on the waterside, and afterwards he took me to G.A.P Kids co. to dress me in his idea of proper attire, tiny cutoff shorts revealing the cusp of my buttocks and some shirts that barely fit, even the sales assistant was shocked at what she thought was my Grandfathers choice in clothing. I couldn't even believe it myself only an hour ago I was begging for money living on the streets and now I was dining alfresco and shopping at name brand outlets. We then hit a couple of more specialty stores afterwards. He said he had to buy me a few more necessities to start with. Lacy G-strings and what looked to me like lingerie pieces I had only seen grown women wearing in magazine ad's or movies was now a part of my wardrobe, in my mind it was a big step up from being a little girl any longer.

The driver took us back to Ron's grand apartment overlooking the isle of Key Biscayne and a large bridge leading into a Miami Harbor. Entering his residence, I was blown away by the spectacular view, rich décor, and white marble floors that were so glossy it looked as if I was stepping on glass. He took my shopping bags to a large room at the back of the apartment and put them into a small closet. The room was considerably large with glass exterior walls that maximized the potential of the panorama landscape soaking in the seascape of Miami. In the room was a gigantic round bed raised off the floor by three steps and mirrors on the ceiling. It looked like a honeymoon suite out of a raunchy hotel. He then exclaimed, "This is my room here and you will be sharing it with me" When I asked him where I would sleep he then sickly replied "With me silly, where else of course?" With no room for argument I pretended to be O.K with everything that my common sense was screaming out in my head to run.

Next I was taken down a long hall at the other end of the apartment to meet five more exotic beauties. Three girls were in their late teens and the other two in were in their early twenties. All of them were from the Czech, here under false passports provided by Ron and his contacts. Yana held my hand while introducing me to the group of girls as "Baby" a pet

name she came up with for me, being I was the youngest one among them or ever to be brought in by Ron for that matter. It became my new identity not even worrying to mention my real name to anyone anymore. My identity was no longer important to myself, I wanted to become someone new and "Baby" is who I was.

A shocking first impression, the girls were completely nude revealing their voluptuous young bodies with such a careless ease and others were in just a G-string, similar to the one's Ron had bought me earlier. They were all stunning girls and full of life. Charismatic and beautiful, they were the girls who should be on the front of billboards not selling their bodies to old crewed men for sex. Doing each other's make-up in front of the mirror and chatting away on the bed with no care in the world, aiming at persuading me to see the highlights of the life Ron gave them and they almost did. Ron left the room for a few moments, letting us all get to know each other a little better and that's when I started to compile an understanding of what really went on here.

Just catching a bit of their conversation from before my introduction, I heard them chatting about the night they were preparing for. Speaking excitedly about some men they would be entertaining in a few hours, one girl was talking about going out to sea with one of these clients on a yacht for a few days. Since none of the girls seemed shy to talk about their professions or anything for that matter, I decided to ask them a few questions about what they did. They were more than happy to expand on their point of view in the conversation, attempting to paint a pretty picture of what they were paid to do.

They all began to jump up and down with excitement like giddy school girls at a slumber party. Another girl with jet-black hair and a thick accent, wearing absolutely nothing at all, grabbed me onto the bed with them and into their fiasco, instantly making me feel accepted into their sorority, like I actually belonged somewhere for once. Yana went on to explain a little more in detail, "We accompany the wealthy friends of Ron. They want only beautiful girls by their side so we come and act however they want us too but most importantly we make them think we want them back too." Other girls began to jump in with their vivid points of view while playing with my hair, they were taking turns brushing and styling it as they were filling my head with all of the prospects I could have as an escort too. They made me feel beautiful like them, too beautiful for what a girl beyond my years should feel. I was simply being lured into a dangerous trap, just like they had been at a young age too.

It pretty much all came down to two things in their game, the money they would make and the lifestyle they were given. Their enthusiasm only interested me further, making it not only sound like an acceptable way of living but also appearing to keep them all vivaciously satisfied. This way

I would always dread the end of every night, fearing what new desires he had in-store for the evening. Sometimes he would hurt me and tell me to try and enjoy it then do it over and over again until I gave him exactly what he wanted, I always resisted until I could no more, he was too overpowering and relentless at getting the results he wanted. At other times he could be so gentle and caress my skin, worshiping every inch of my body, all relying upon on what mood he was in. Often though he liked to play the teacher role and instruct me on every motion and explain what would happen when I did those certain things to him. No matter what he did to me I was only disgusted with myself more and more. I still shudder at the thought of how he used my body.

I turned fourteen in August that same year and was spending my birthday loaded on a concoction of pharmaceuticals and alcohol, being generously supplied by the very man who swore his devotion to caring for my every need. I didn't even know myself any longer, completely shying away from the girl I had grown up to be until to this point. The apartment was empty except for me, for the time being, and that was God's own little present for me...some solitude for once I thought. Pouring myself another drink I opened the sliding glass doors to the balcony and walked to the edge. Looking down from the many stories where Ron's apartment was, I wished myself a happy birthday out loud and wondered if my family even remembered the day's occurrence.

Dwelling in my sadness for the fourteen years of suffering and loneliness I had already endured, the tears swelled up in my eyes, trickling downwards making my eyeliner inevitably leak down my cheeks. Inside I felt so trapped and began to entertain the thought of jumping over the edge, it all seemed much easier, and the simple blackness that death had to offer rather than the tangled mess I was so tired of fighting to get out of seemed a much easier approach. Detached from wanting to feel anything, I became so numb towards my life's own tragedies. I couldn't live like this any longer. I lifted my bare legs over the edge of the railing and sat looking at the ground beneath me so close to even just slipping off the edge to my very death. I couldn't think of any reason not to fall. I thought I had made too many bad decisions to keep going on but some force of a higher nature had other things in store for me.

The sliding door slammed open with a burst of speed and Ron scooped me up in his big arms and brought me inside to our bedroom. Laying me down and seeing the look of despair in my eyes from my tear stained face he went into the bathroom cupboard and returned with three pink pills. Forcing me to swallow them using the angered tone of his voice he thought he was turning my sorrows into a distant dream as I passed out in

his tight clutches, crying myself all the way to sleep. He didn't even ask me what was wrong, probably because he knew already.

Soon enough the crumbling of his evil empire in the underworld of selling sex for his own advantage began with a single crack in his perfect scheme, and proudly it all started with me. Ron got a scare one-day and rampaged through his apartment telling us girls to only pack our important belongings and some clothes as we all had to leave right away. I didn't have much belonging to me so I basically sat there watching everyone rush around frantically and was curious what could've gotten a man like Ron so scarred. Once we were packed up and in the limo he was trying to calm the frantic girls down after all the panic that spread through the apartment like wildfire, I was the only one sitting there half amused at the entire situation.

He began by assuring us that everything was going to be fine. Calmly he continued to tell all of us packed in tightly, even for a limo, that we were all taking a long trip to Florida's countryside because someone has reported an anonymous tip to the missing persons unit at the local police station identifying a very young girl as a possible victim of abuse living at his apartment. Ron knew what a landmine of trouble he had brought upon himself making an exhibition out of me on the streets of Miami, I didn't pull off the older look like the other girls, I actually looked younger than my age with my blue eyes and freckles always giving the impression of my youthful innocence.

Now he just had to do whatever it took to ensure he stayed as far away from the authorities as possible. Arriving at a ranch in central Florida many hours later and I assumed it belonged to Ron knowing never to ask him things like that. I knew my purpose and it wasn't prying into his personal life outside of the bedroom. There was a main house, a few cottages, some staff quarters and paddocks where the horses were kept. I was in heaven...I thought at first. Finally, something I could really enjoy. Riding was my passion, basically growing up on the backs of horses since I was just able to walk.

Not surprisingly I began to despise Ron and all of the girls for the gross exploits they made me do with them. Beginning to isolate myself from everyone I'd rather spend my time sitting under a tree watching the horses graze, writing in my journal or painting but mostly avoiding everyone possible unless Ron required me elsewhere. Nighttime was always a reoccurring nightmare for me. Relived over and over again in many various ways. Ron would always start by making me some drinks and offering an assortment of pills before indulging himself by grotesquely putting his genitals in my mouth and tell me how to give him what he would call a "first-class blow-job", and I was being judged every minute of it. Ordering me to slowdown or speedup or maintain a perfect

rhythm I was constantly being criticized for my efforts in pleasing him. I was eager when he actually gave me a compliment. The rest of the evening was always a surprise left up to a moments notice. Quite regularly he would proceed with having the girls dress me up in some sexy outfit and loads of makeup then entertain him with a lesbian reenactment revolving him in the center. Sometimes they would use dildos and other foreign sex toys, Ron liked to see us hurt during sex, sometimes even penetrating me anally but I always resisted and would try to redirect him with another sexual desire of his but I had no excuses when it came to me having to use the sex toys on him, he told me how men have g-spots in their rectum and instructed me on how to precisely penetrate him. These nights went on what seemed like an eternal sentence for the price of not living on the streets, where unfortunately for the one's still there, I feared and knew from my own personal experience, could be much worse.

Needing some contact with someone of my adolescent mentality I called one of my school friends from the past, whom I wont name out of privacy, but I'll call him T.J. We were so close and I knew very well, so well, I had memorized his number a long time before. He was my first puppy love sprung from of a childhood friendship. Being my very first crush the summer before all of this happened he was the only person I could think of that would care enough to talk to me.

In the middle of the day, the least busy time to be noticed, I snuck into one of the vacant guest rooms and used the phone to call my good friend. The sound of my voice radiated a chill in him. "It's you, oh my God Jenna! Are you okay?" he was so shocked to hear from me and the sheer fact I was still alive. Nearly three months now without a single word to my family or friends, every one doubted my return. My attempt to forge a happy voice when I spoke to him failed and I absolutely crumbled when he was at a loss for kind words for me. I told him of my current state of affairs. Telling him of Ron and how I was terrified of him, trying to escape in the middle of nowhere was useless. It was like being kept in cage that I was unable to break free from. Going on to dump my issues on T.J, I proceeded with how I longed to call my family and to be with my them for good but was too afraid they didn't want me, knowing I'd just be sent away somewhere else again and to me after all this time was like going from one cage to another.

He had been called by them numerous and promised me that they were very worried and even hired private investigators to try and find me. Given I was eleven years old the first time I was sent away, my trust in there sincerity he spoke about was seriously doubted. I kept the conversation short just in case my absence was being noticed and I left on the note that I would speak to him again shortly. His attempts to get off

the phone were nothing short of desperate plea to keep me on as long as possible. I thought he was just trying to help in someway. Giving him assurance in the fact I had survived this long obviously I can hold off a while longer I gave him my love and told him I'd be in touch.

Thinking I had slipped away unnoticed I entered into the room that I shared with Ron, hoping I got away with my brief and very needed phone call. The place looked empty and everyone else seemed to be out and about so I decided to have a bath in the spa and try to relax before the night's precautions. My body glided into the steamy water as I began to think about T.J and how good it felt just to hear from a friendly voice. My thoughts drifted into the days I missed when I felt I could be silly and childlike and I nearly forgot for a moment how grown up I was acting these days.

My first glimpse at the image surrounding me when I resurfaced above the water was daunting. There was Ron was standing over my tub, looking down at me with an eager display of his arousal. He began to undo his pants and take them down when he told me "put your lips on my cock", I was too slow in responding to his request so he grabbed me by the back of the head and forced me into his groin. I had tears streaming down my face as I looked up to him with the saddest blue eyes hoping he would take pity and stop, but he never did. I was really hurt by his aggression and he definitely knew it this time, which I believe only made him more heated. I closed my eyes and began to count using the time to keep my thoughts elsewhere believing every number I counted only furthered me to the end of this. I just got over a hundred when he finally exploded in fulfillment still half submerged in the deep bath I was struggling to gain my bearings in as Ron was picked me up out of the bath and carried me to go to the bedroom, which was just outside the French adjoin doors. Still damp from the hot water in the spa I had goose bumps from the chill of the fresh air where he brought me to the bed and proceeded to deeply violate my every being. Eventually his scars that he left were too deep ever to be healed and would even carry on through the years to come.

Upon his bursting with pleasure for the second time, he just got up and left, without even saying a word to me. Left alone I was awake for hours after that. There was no escaping the pain that night. I lay naked wrapped in the sheets, sobbing in the dark. My feelings of being hurt and disgusted after his abusive ordeal "When will it ever stop" I prayed to God and begged for death rather than face another day in my life. I woke up still alone the next day and exasperated from the misery I felt the night before. Ushering through my drawers to find something to throw on I could care less what lay in store for me today, couldn't be as bad as being raped by a scary man repeatedly.

Starting my day with a few of the supplied oxytocin's and a bloody mary, made by the live-in house chef. Having two celery sticks for my breakfast, I wanted to lye out by the pool and forget the world. Ron hated tan-lines so to be caught with a bikini top on was a big no-no in his rule book but after my cries to stop were so blatantly ignored last night, I was out to piss him off so I didn't remove my shirt. I put on my headphones and before I knew it had fallen into a deep slumber from my self-made therapeutic cocktail, the only way I knew how to cope with the emotional turmoil on the inside.

Desperate to hear his voice I called my friend T.J a few more times that week. I needed to feel like someone out there really knew me. Sometimes we could just chat like old friends with no care in the world and laugh at a distant memory from too long ago. Then would come the good-bye part of the conversation and we would both get teary-eyed not knowing what could happen next or if this would even be the last time we ever spoke to each other again.

My biggest fear came to reality when I was in our bedroom one afternoon, just lounging around out of boredom. Ron came bursting in through the door, red as a tomato. I couldn't help but feeling I was in big trouble. His face was distorted and raging towards me. I knew right away he must have found out that I was calling T.J, but how, I had no idea. I had always tried to be as invisible as possible, soon enough it was all explained.

"Are you trying to get me caught? You are nothing but a stupid girl you know that! What am I supposed to do with you now?" He was tearing up the room while his rants gave me something else to think about. What would he do with me if he had no use for me any longer? I wasn't even thinking about him being caught for soliciting illegal immigrants for the purpose of prostitution. I was more worried that he would be upset at the fact I was talking to another guy, maybe even jealous that he was at least my age. I replied with simple sentences that I could manage to get out between all the shouting. I kept saying, "I'm sorry" and putting my head down in shame. He picked me up by my throat pinning me against the wall, "You are going away, far -far away from me and you better be nicer to the next man I send you to, I've heard he's not a nice as most would like. Are you fucking hearing me Bitch?" I slid down the wall, choking on the first air entering my lungs, breathless and terrified, I never thought Ron was a nice guy but I had never seen him lose it this bad. Now I was being sent me away to another stranger, another man, it only terrified me more.

The girls came in to say their good-byes all of them were crying and asking me in their best English languages, why I had to call someone and lose everything? I was able to find out through the broken sobs off of

them that the confession came from the house-keeper who said she saw me use the room regularly but was never messed up, so Ron looked at the recent telephone bills and found the same number dialed from that room consecutively, he knew it was me right away. At least he didn't know it was another guy, I thought to myself, or I probably wouldn't have made it out of there alive.

Ron came back to usher the girls out of my room and told me I had five minutes to pack my clothes, which he made clear were to be my only belongings to take with me. He washed his hands clean of me that night, or so he thought. The driver came knocking at my door, just as Ron said, no longer than the five minutes that he had offered me and he took my single bag to the car. I didn't want all the jewelry, music or books that he so caringly bought me as tokens of his twisted affection. Only taking my clothes and a wad of hundred dollar bills I had been saving, I slit a hole in my scrunchie inserting my cash for a rainy day that I was more than sure was just around the corner.

We drove for hours, until I started seeing familiar surroundings. I couldn't believe my own eyes. I was back in Miami, but not on the beaches, somewhere in the CBD this time. The Driver delivered me to the front door with my one bag and waited at the door with me. Now I knew how it felt to be a puppy picked from her litter as you can only hope your next owner would treat you with some sort of kindness.

Another balding man answered the door but he wasn't so grotesquely fat like Ron, but still a new owner at that. He looked me up and down and seemed amused as he snickered to himself. With one last look to the driver over my shoulder it was almost an appeal to him for some way to help me. I knew he couldn't anyways, I was just hoping. He told me his name was Charlie but didn't even bother in asking me for mine. I was sure Ron already filled in all of my details when he arranged this.

Charlie picked up my bag and led me into his bachelor pad townhouse. I was never given a welcoming tour of my new residence or made to feel comfortable. He walked me up the stairs and opened one of the doors in the small hallway. Telling me this would be my room, he showed me into it and told me to wait, he would be back shortly. I sat on my bed afraid to touch anything and after the warning Ron gave me I knew I had to watch my step around here. I put my head down onto the pillows my where world was falling apart and let my emotions downpour. Exhausted from the days emotional turmoil I ended up falling asleep. I don't even know if he ever came in at all that night.

The next morning I looked out of the window to see my new surroundings. It was a beautiful sunny day outside, unlike the dreary cell I was locked away inside of. Feeling the sun warm up my face through the glass, it radiated a familiar sense of comfort from the days of the good

parts of my childhood. I reminisced how it had used to be before all my life turned upside down. Before all of the fights with my family, before I had to look after myself, and before I was a slave to men.

Those days were too long gone now. With too many hard times passing me by it seemed surreal to think that life had ever even existed in the first place. With that thought I shook myself out of reminiscing that way. Whatever was going to happen was out of my control now, I just had to give myself some hope that I would have the strength to get myself out these circumstances before anything really bad happened.

Chapter 2

The house was quiet so I just assumed Charlie was still asleep. I decided to get cleaned up and have a shower. Not even a knock on the door when Charlie walked in with ease. "Typical" I thought. It was an easy way for Charlie to break the ice. "You really are as beautiful as Ron said" as he opened the curtain. Watching me rinse myself in the shower and me knowing I had no way out of this except to go along with whatever he wanted. I just looked down at the mention of Ron's name, wondering what else he had told Charlie about me. Realizing later that he wouldn't have said anything anyways, in fear I would've been a damaged product that wouldn't make him the money that young girls go for.

He just sat on the side of the vanity top and continued to take observations of me standing submerged under the falling water. I avoided looking at him and let him do all the talking, after all I knew what I had to say was of no importance, that is if he was anything like Ron. Between the water beating down over my head I could slightly hear him ramble on about some club and restaurant he owned in FT. Lauderdale. He said he was going to take me shopping for some club outfits and we would party together tonight, as if I was supposed to be excited over this so-called treat of his.

I looked up and gave him a quick smile adding a compliant nod and turned my attention to turning off the faucets and quickly grabbing my towel. I was falling so far from who I used to be, shying away from my outgoing personality to a quiet girl that didn't even recognize herself in the mirror anymore. I dried myself off and looked at the man standing between the doorway and me. He was still watching me with a sleazy look on his face but now preceded to move in my direction, arms wide open. He embraced me, running his hands up around my youthful curves, licking my neck and earlobes. Then his large, rough hands cupped my small breasts and continued downwards to feel in between my legs. I

knew what I had to do to get this over and done with as quick as possible, but I was dreading this moment from the second he greeted me at the door last night.

I fell to my knees and gave into his demented perversions. Thankfully it didn't last long before he climaxed and I was allowed to get myself dressed and ready to go out. I was nothing but money well spent in his mind. This was another extremely wealthy man with a completely new set of wants and needs asking a fourteen year old girl to affectionately dote on sexual desires to a man in his mid forties. I really hated myself, these men, and just about everything my life had boiled up to by this point, but I knew from a young age that to survive in this harsh world I would have to do many things I would not willingly choose to.

At the shops he decided he would choose the clothes he paid for, which I might as well have been declared a teenage prostitute. Just like Ron he also liked it that way. The more degrading he was to me only proved his ownership of my body. He bought me tiny cocktail dresses, and skimpy outfits, which I thought closely, resembled the lingerie he'd also bought for me to wear for him. I noticed that day that he enjoyed parading me around the shopping mall and out for lunch at hooters, even joking with the waitress that he'd like to buy her uniform because he thought it'd look sexy on his new girlfriend.

We arrived at his two in one, Restaurant and Club, at around nine o'clock in the evening. It was a revolving tower called "Hot Chocolates" in downtown Ft. Lauderdale. The food was delicious and for the first time since being with Ron, I ordered a hefty meal with steak and mashed potatoes with a scrumptious gravy smothered on top. Charlie ordered strong cocktails for us both and before I knew it my head was spinning and we were on the dance floor together. The music blared in my head and the rhythm of my body took over, completely forgetting about even dancing with Charlie and letting the music take ahold and work it's magic.

It didn't do me any justice though as Charlie watched me imagining what pleasures lay in store for him later on. Taking me home before the club had even closed, he just couldn't wait to indulge on exactly what he was fantasizing from beforehand. Once back at his townhouse he led me up the stairs into his bedroom and pushed me down in the middle of his bed. The motions from the wavy mattress made me dizzy and feel even drunker when he lay on top of me. Coming at me like a hungered beast wanting to ravage his next meal, it was intimidating as he entered into me with a forceful thrust, he moaned out in delectable heaves. I looked away while he self indulged his own gratifying needs using my body as his instrument in pleasure. I only grew stronger in my head letting the hatred for men desires intensify.

The next two weeks I was expected to be at Charlie's beckon call, never aloud to leave his side, even making me sleep in his bed from the second night onwards. I never even got the chance to call T.J again. It was too much of a risk anyways. Thus pushing him further out of my memory, too afraid, of the emotional repercussions.

Our typical routine was to wake up get showered and dressed and I would put on my make-up while Charlie made his business calls for the day. We would leave the house mid-afternoon and run his errands do some shopping, sometimes meeting his friends or business partners for lunch, none of the men he introduced me to seemed offended at his choice of adolescent eye candy. They'd just continue to chat away as if it was normal to be in public with his arms draped over a girl young enough to be his granddaughter, not too shy by giving me a flirty tap on my bottom or even try to kiss me.

My last night was no different from every other night. We went shopping that day and out for lunch alone. Later we headed to a club his friend just launched and it was his grand opening that night. The club was called "Iguana Joe's". We met up with his friend and said our hellos. They both seemed so excited about the club and Charlie was full of compliments all around. The club did have a line out the door which looked a mile long coming in, luckily we didn't have to use the front door. Charlie returned from the bar with two giant long-island iced teas, which were his favorite drink to start with and then we just sat for a while watching people dancing. Occasionally conversing about passing thoughts. We danced for a while having a few more drinks and after about two hours, Charlie said he was ready to go home. What a daunting time to look forward to, he always liked to have a brief sexual encounter before drifting off to sleep with my naked body intertwined between his arms and legs.

It was bad enough to have to entertain him at every given second of the day but his grip on me was so stifling I felt so choked I could hardly breathe much less sleep. Eventually my over-worked mind would drift in-and-out of a restless sleep, but constantly on edge. I thought many of nights of escaping, but where would I go? Would one of Ron's ever-so-connected informants finds me and turns me into him to be disposed of for good? I just prayed that I wouldn't be another missing person to add to the list of girls found in the local ditches. I knew that's where I was headed if I screwed this up for Ron again.

As if my guardian angel was there the whole time listening to my secret prayers, my rescue came the next morning with an abrupt bursting through the bedroom door at about six am. Charlie and I were still lying in bed together and his grip on me was still tight. The men dressed in all black military gear had large guns and helmets on. It was so frightening

at first. I couldn't even comprehend what was happening so rapidly. I thought Charlie could've been in some kind of trouble with a business friend he had done wrong too, but then one of the men in black shouted "F.B.I this is a raid get down with your hands on you head", in too much shock to move three of the men grabbed Charlie and threw him to the floor and cuffed him. I sat up in bed with my sheets covering my naked body and watched as they dragged Charlie from the room. Still completely nude he wasn't even aloud to get dressed. Another agent had to come back in to the room to find him a pair of shorts. I could hear him screaming at the top of his lungs all of the way outside He was screaming and the last thing I heard him yell was "If you say anything you know who will find you!" I could hear more threats being yelled at me but I couldn't make out what it was that he was saying. I was in total confusion and couldn't believe what was happening. There were so many uniformed agents I felt so small compared to all of them but they were all very kind and helped me out of bed allowing me to remain covered up with the bed sheets so I could get dressed. The first decency I had been showed in a long time. It was an odd feeling to acknowledge. I knew the life I had come accustomed to for the last six months was now over, and in so many ways I was relieved but was also very nervous about what lay ahead of me.

I excused myself to the bathroom to put some clothes on. Not having anything half decent, like a normal pair of jeans and a t-shirt. The best I could come up with was a metallic blue miniskirt and a tiny matching top that fell just below my breasts, hardly clothing at all it was more like scraps of cloth. Putting my hair up in a tight bun with the scrunchie that held my five hundred dollar bills I was led out of Charlie's townhouse for the very last time. Starting my life over...again, I wanted to leave behind my every memory belonging to these horrid times. Only taking small sack containing my underwear, makeup bag, and journal with me.

The agents led me down the staircase and my last vision's of Charlie was bent over the hood of a police vehicle still screaming and handcuffed. I slipped into the backseat of the car and was driven to Broward County Police Station where the Federal Agents interviewed me about my entire whereabouts for the last six months. I was so scared of what Ron would do if I told the agents what really happened but at the same token I knew he'd most likely kill me anyways for being such a liability.

Over the next few hours I sat down and told the agents how Ron's business worked and what I part I had to play to him. I was able to ask how they found out I was at Charlie's house and they informed me that I was being followed all the way from Ocala, Florida where Ron had me stowed away for the last four months. T.J, my friend, called my parents

after our first phone conversation and ever since then, the F.B.I were tapping the phone lines and recording every conversation. Completely unaware of T.J.'s caring act of deceit, I was in such shock that they had been tracking us for so long. I knew now, with or without my help, the F.B.I had enough on Ron to put him away for a very long time, if they could catch him, that is.

Having so many crooked people working for you can be an advantage when you're in trouble. Like having a pair of eyes in every city. Ron was somehow able to find out about Charlie's arrest and immediately deserted the country to avoid legal punishment, not to mention the discretization of his esteemed clientele that the feds were now on to. Ron had so many countless charges put up against him, eventually when the F.B.I were able to track him down they were able to have him arrested in Yugoslavia and extradited back to Miami, he was finally held accountable for being a pedophile, soliciting women for prostitution, and running many illegitimate and illegal businesses. By the time the F.B.I caught him he was in his mid-seventies when he died of old age serving his second year prison for a lengthy sentence. Coincidentally I was told of his punishment and death many years later by one of the same F.B.I agents that had rescued me from Charlie's arms.

I was taken out of the interrogation room after the interview was over with and told to sit at one of the officer's desk while I was waiting for someone to pick me up. Uncertain of who that someone would be I assumed it would be someone from the juvenile delinquents division to take me back to some state operated lockdown facility. Not the nicest of places to call home, but I had no choice in this matter.

Sitting back in the revolving chair I was twirling out of boredom and listening to the roaming conversations within the office. I pondered in fearful anticipation of the dreadful places that lay in store for me. Having to spent a lot of my adolescence in these kind of places for the sheer factor that my mother said "I was out of control and unable to handle" by eleven years old. There was plenty of just reason for me to be so scared of those places. What I knew lay in store for me were constant fights between the rough girls being settled with violent raids then out came the pepper spray and then the strip-searches and worst of all, no sunlight. It didn't matter if you were a quiet, shy girl that didn't belong there, when there was a fight, which was could be like a few times a week, every person in the room was considered a threat and were treated like a violent criminal. I hated those places and the memories they gave me. That's why I always ended up back on the streets. No child or even a juvenile should have to be subjected to such unreasonable force and neglect. Some of the girls were so used to being subdued to this kind of treatment their

whole life they ended up repeating the same attributes as the people who initially hurt them in the first place.

One very sad girl I'll never forget her, had a father who had been a heroine junkie and decided to play Russian Roulette with some of his addict friends and by fate or chance took the bullet straight through his brain, killing him instantly. Her mother being a heroine addict herself spiraled downwards after his death and gave her four year old child to her ageing grandmother that eventually had to put my twelve year old friend in this un-dire circumstance. I can only have the highest hopes for her today but unfortunately for most girls that have been victimized by society aren't able to ever stop being a victim for the rest of their lives or go on to make other people victims themselves. A sad and unfortunate fate for so many innocent, and it happens so much more than anyone would rather admit too instead of just trying to find a solution.

Chapter 3

Hours later I was still twirling myself in the same office chair when I spun around to see my Father walking in my direction. I nearly fell off my seat at the sight of him. Gripping the chairs handles I couldn't imagine what in the world I would say to the man I once used to call Daddy but now hated for the abandonment and unforgiving wounds he instilled inside of me. He contemplated putting his arms out to hold me but instead anger and shame took over and he just shook his head. I never saw my Dad cry until that day and I have to say it made me feel young again and sad I had disappointed my parents again. The agents now standing beside us led both of us together back into the interrogation room to re-tale my journey to my father who they said I had no choice to tell, or they would have to tell him for me, being I was an under-aged minor and Ron violated the statutory rape law, among many others, when he took me back to his apartment and kept me as his sex slave. My Dad couldn't believe what he was hearing and for his lack of better choice in words asked me to stop talking, he was just happy to know I was alive. Like everyone I'd known in life they would rather brush it under the carpet and not deal with the pain rather than realizing sooner or later it all comes out sometime in our life even if it transgresses into our future then becomes what we are willing to accept out of partners, work, and people in general. Simply saying in other ways than with words that our bad decisions befall our tragedies later on in life.

The next discussion was led to where I would go to from here. Before anyone could put his or her suggestion forward I leapt in with my two bits and made it obviously clear to my Dad that if I was sent away to

another lockdown facility and if he betrayed my trust, again, he would never see me again. I would disappear for good this time and for all he would know I could be dead in no time on the streets. He looked at me and for the first time in my life he saw the many years I had grown up in the time I was gone and heard the seriousness in the tone of my voice when I made my vow to him. He put his head in his hands and told me the bad news, my Mom didn't want me to come home and she was making his life hell for even suggesting bringing me back into their lives. I for some reason threatened her lifestyle and drove her crazy. I had been surprised about a lot of things lately but not that one. The last time I saw my Mom she ever so carefully lied to me and told me she was bringing me to an eye-doctor for an infection. Instead we walked into this tall blue building with people in uniforms holding clipboards and a few muscly guards, she ushered me inside and hurried up to close the large auto lock doors behind her leaving me there alone and imprisoned, which is what led me to recently living on the streets. My life was hell as long as she was in control of it, so when she didn't want me back at home I was fine with that too, but there had to be somewhere else I could go. My dad said he had no choice but to put me back into the facility, but he made a sincere promise that he would not take any longer than a week to try to find a place for me to stay and to go to school. A week I could deal with, but I was still unsure if I could trust my father and hold him to his word, but yet again, I had no choice. Being my legal guardian he could send me anywhere he wanted and there would be nothing I could do, except for keep running. I gave in, and before he left the officers to take me back to the last facility I had run from, I gave him one last hug and reminded him "one-week and I'm gone". Nodding his head and squeezing his arms tighter around me, I could only hope he meant it, but he didn't look too optimistic.

In the police car on the way back to the facility they had to handcuff me in case I ran again, but I had no intentions to anyways. I was going to give my dad the week before I began to search for the right opportunity to jolt again. I was like a "ghost come back," said so many of my girlfriends from the past and there was now a lot of new faces there too. At night when we were all in bed and supposed to be sleeping, I would be daydreaming of better days and imagine myself somewhere in a comfortable bed, actually enjoying my life for a change. A week went by in this facility spending most of my days locked up in what they called "The White Room", a bare room with concrete flooring, no toilet or even a chair to sit on. The only comfort I had was the blue sweater that was provided as part of the uniform, and my hair scrunchie filled with my stowed away cash that no one had found during my unpleasant strip-searches. I would spend hours in the white room for objecting to their

conformity and unwilling to participate in their drilling regime. I didn't feel like I owed any explanation to these people even when they brought a physiologist in to speak with me, "What was the point when I would be gone any day now" and as if any of these people even cared in the first place, I was just another number in the system and they had a job to do.

There was one mega-bitch, female guard, named Evelyn and she used to either really like you or really hate you and God-forbid you were one of the unfortunates that she didn't like, she'd make your entire stay their an agonizing nightmare. Constantly picking on girls who were not strong enough to cope with their predicament or past issues, she'd stand them up and publicly humiliate them, and even when they begged her through their sobs to let them sit down, she'd only torment them worse. Which only made the strong girls want to antagonize the fragile one's with more malicious intent. Luckily when I had previously been there she didn't take much notice of me, but I stayed out of harms way with her, just being quiet and observant.

Being back here seemed like an eternity while I held my end of the bargain but unfortunately my Father didn't. The first chance I saw to run I took it. I was being sent to go get my blood and urine taken for drug and disease analysis. My driver would be a volunteer from the community and it was the perfect getaway for me. I was brought from the white solitaire room and led into the bright sun, feeling like today would be favorable in my escape. We got to the doctors office, my whereabouts told me I had plenty of ways to run and I scouted out the best looking route. My plan was to barge through the volunteer's inexperienced grip and wriggle my way out if needed, then hit the asphalt, running until my legs couldn't carry me any further. Playing it out in my mind felt different to the anticipation that led up to actually doing it. The inner-strength I had was the only thing going to help me in this circumstance.

We arrived in the parking lot and I hadn't said a word to him the entire drive, the small framed Spanish man tried to make pleasant conversation but I couldn't see him as anything but a challenge, so I kept quiet instead, ignoring his humorous attempts to befriend me. The car pulled to a stop and he came around the side to unlock my door, this was it, "here we go" I told myself, and pushed past the volunteer. His arms grabbed out at me but only caught me by my shirt, he didn't even put up much of a struggle, like some of the other trained one's I had gotten before, they would put me into body locks of all sorts but he just tore at the collar of my shirt letting me break free. I had done this many times before so I knew I wasn't gone yet, I had to first get out of these clothes. The cops would be looking for someone of my description in the area with a blue shirt and khaki pants, so my first stop was a busy shopping complex. I took the money from my scrunchie and bought myself a pair of jeans, a shirt, and

a sweater for disguise and my next stop was Dunkin Doughnuts' to get a chocolate iced doughnut and a cup of coffee. I didn't have doubts about getting out of the facility but I wasn't expecting it to be so easy this time. My past excursions all began with an abrupt struggle sometimes ending in a brutal state of affairs after being pepper sprayed and fastened into some painful lock by forceful men four- times my size, then tossed into solitary until I saw my next chance to desert. I got to know the guards real well, as I spent a lot of my time being dragged down to the white room by them. There was Jim, a large black man who could've doubled for a "Miami Dolphin's" defensive linebacker. John was another big man with a ponytail and a mustache, and he looked like someone who definitely owned a Harley. The last guy Scott had a smaller build but made up for it with his steroid injected muscles bulging out of his neck and their was the added height from his curly fro. When they weren't restraining me and holding me captive in solitaire, they were actually pretty nice guys, not afraid to have a laugh after some explosive incident and I held no contempt towards them either, they were just doing their jobs.

It was de'ja'vous all over again, free at last but where would I go now. With Ron's scouts on the lookout for me, and now the authorities being notified I was a runaway again, I would have a lot of people searching for me, so I knew I had to be careful where I went. My last stop before leaving the shopping center was to use a payphone to call my parents, my Dad answered completely surprised to hear me on the other end, I wanted to sarcastically thank him for breaking his promise to me and I hope he is happy now, he just lost his daughter for good. I stopped to listen to what he was trying to say and he told me "I was getting you out in a few days, I found you somebody to stay with, she's a good person who has got teenagers your age, I was just trying to convince your Mother to sign the papers to get you out of there".

I was so outraged at her ability to put her own wants before the needs of her own flesh and blood daughter. I told him to come pick me up and bring me to the house so I could speak with her for the first time in over a year, but if I felt threatened for one second I will be on my way quicker than a blink of an eye and on my own for good. He wasn't overjoyed at my proposition, knowing what position this put him in as her husband but as my father he decided to put me first for once and take me home to confront my mother.

I arrived at my house for the first time in a long time and everything looked different. My parents refurnished and renovated the house. I didn't even have a room anymore, my old belongings and bed were removed and it was now the office. Of course my Mom didn't meet me at the gate or the front door like her long lost offspring reunited. No, instead she

waited for me to come find her outback smoking cigarettes and having a beer. She stood up from her seat and squinted her eyes loathing in her hatred she coldly slapped me hard in the face. The slap stung, but I matched her look with a familiar stone-coldness that only she could understand. Immediately we both started to cry and we washed away our anguish and resentment through our tears and consolidated our feelings for the first time since the chaos first affected our lives. She didn't want to know much of my whereabouts and she still had a lot of anger to get over but she asked me to stay home at least. My little brother ran through the back door and hugged me so tight, I started to cry again and was saddened by how much time I had missed the time I had lost just hanging out with my brothers and it took me even longer to realize how precious time really is. We were never going to be the average Joes next door but at least this was better than nothing. I loved being with my family again. We had BBQ's and bon-fires with each other and life began to slowly piece back together. It was bizarre how normal it was when I first got home. I turned fifteen that year and it was the exact cup of tea that I had needed to boost me up and get me on the right track.

I decided to go school to acquire my general education diploma or G.E.D and got a summer job with my Dad at Mar-A-Lago, Donald Trumps exclusive country club in Palm Beach. Surrounded by lush acres of tropical landscapes, manicured gardens, and a mansion made into a beach club for the rich and famous it is known as the "Jewel of Palm Beach". I was in sheer awe at the gold arched ceilings and the grandeur ballrooms.

The spa where I worked was world class, not only oozing in style but in the way each and every clientele was treated with the upmost service. My focus was now set on becoming a massage therapist, and working my way into a luxurious spa like the one I worked for now, only I was a locker-room attendant there. I studied many books about the anatomy of the human body and how you can affect a person's well-being and health for the better through a simple healing touch. It was amazing to me the way the body responded to massage. I was more than just interested. I was determined to become a therapist.

It was one of those anatomy books that I had my nose buried in one afternoon on a quiet Tuesday and it could get pretty lonely in the locker room, so if I weren't busy I'd sit outside by the spa's reception and read my books in the warmth of the Florida sun. A lovely looking woman in her late thirties who spoke with a proper English accent approached me. I assumed it was a general question, "like where's the ladies room or was that the famous model from so-and-so?" but she was more interested in the book I was reading. Only believing at first we were just making small talk she was really intrigued at my choice of reading. She then asked if I

did massage on the side, I stated I was only reading the book and had not yet began to study but one day I would love to practice massage therapy.

She introduced herself as Ghislane Maxwell. I would later find out that she was the daughter of the late prominent businessman and disgraced newspaper tycoon, Robert Maxwell. I told her my name is Jenna pointing to my nametag on my shirt and offered her a cold or hot beverage, as those were my instructed duties at work. She accepted a tea and went on to chat a bit about this rich guy that she worked for and she knew off-hand that he was looking for a massage therapist. Just doing me a good deed out of her kindness of her heart, I'm sure, she offered to introduce me to him. I declined her first proposition, thinking out loud, told her I didn't know the body well enough to even attempt an interview. She didn't seem worried at all by my fear of incompetence saying that if he liked me enough he would get me the best training in the industry. Ghislane thought I had a cheery persona and fit the quota for what he was looking for and as she put it an enthusiastic learner that she said she gathered from the sticky notes popping out of the various sections in my book. I accepted her phone number and the house address and told her I will call her if I am able to come over after work. I rushed over to the tennis courts where my dad was working and told him of the news. We both thought this could be a wonderful opportunity to get my accreditation in massage therapy. Seeing that it was a lady in her late thirties who came off as more of a nurturer rather than a procurer, neither of us saw any reason to be hesitant.

Chapter 4

At around Five p.m. my dad drove me down to the bottom of "El Brillo Way," on the Palm Beach intercostal. We pulled into a short driveway beckoning a large pink mansion with heavy wooden doors. I was so excited about this chance and asked my dad to wish me luck. He gave me a big squeeze and wished me the best. He walked me to the front door and I rung the door chime. Moments later we were greeted by an older gentleman dressed in a casual butler uniform. I told him I was here to meet Ms. Maxwell for a massage trial and he opened the doors for my father and I telling us to wait in the entry as Ms. Maxwell would be on her way any second, and she was. Down the stairs she walked with a warm smile, her short black hair seeming very proper and elegant, for now. She shook my fathers hand and thanked him for bringing me and kissed us both on the cheeks. They spoke briefly about whom she worked for and about Mar-a-Lago where we worked. She was in hurry, you could tell to end the conversation and say good-bye to my dad, which she did so

ever pleasantly. She said the boss was upstairs and waiting my arrival, so with that I said bye to my dad and began to follow Ghislane up the stairs. I was so nervous, but I didn't show it. I kept my reserve and demeanor cool as ice, trying show maturity for the open position. We continued on to the massage room, passing by a grand crystal chandelier, and a couple lengthy wooden hall tables displaying a multitude of photos displaying young girls and beautiful women, trying not to gawk at them I didn't even notice that some of those girls were only wearing their smile.

Ghislane asked me how my day at work was and I told her it was easy peasy as always just trying to make simple conversation. There was a fork at the end of the staircase and she led me to the right hand side. The lights were dimmed in the bedroom but I could still see the King Size bed in the middle of room, we did a U-turn around the bed, which led us into a massage room. Dripping in luxury I could've definitely compared it to the renowned Mar-a-Lago's spa's, it had marble walls and a glass enclosed shower and self-automated steam room at the very end of the Burberry carpeted room. There was a large mirror over a basin to the right of the room with an array of oils, ointments, soaps, and lotions and a small closed door, which I assumed must be a closet. The only thing that struck awkward about this room was the naked man laying face down atop of the turquoise massage table in the center of it. "I had to be prepared for this," I told myself. Massage was something I had never done before so I quickly brushed away my thoughts of possible schemes, wanting to believe whole-hearted this was going to be legit. Ghislane introduced us to each other and I proceeded to make his acquaintance.

Looking up at from his downwards position, he looked me over and gave a smile to Ghislane, an obvious notion of his approval. He was Jeffrey Epstein as she pronounced for him, as if I supposed to recognize his name or something. He affirmed, "It was his pleasure" and replied to just call him Jeffrey, "No need for formalities" he answered, cleverly putting me at ease. This man did not look like someone to beware of. Both him and Ghislane appeared to be very nice people and conscious of their health as their need for massages and spa visits, no alarm bells went off, yet. I was prepped by Ghislane to "treat this as a lesson from her and follow her exact lead, if I did good tonight then maybe I would become Jeffrey's Travelling Masseuse, seeing the world and getting paid well for it". I was very hopeful, a job like this could really make my dreams come true.

I followed suit and washed my hands with warm water so the coldness would not shock Jeffery's naked body, then lathered them in rich body butter. Ghislane told me to always keep one hand on Jeffrey, even when getting more lotion, so it didn't make him lose concentration on being relaxed. She gave me a tip and told me to keep a blob of lotion high up on

my forearm so it prevented me from having to keep going back for more and was less disruptive to Jeffrey. This all seemed for real to begin with, I was being educated about the body and splitting Jeffrey's body with Ghislane, mimicking her every motion. Starting with his feet, we began with his heels and arches of his soles. Pushing the blood up his calves in upward strokes to rejuvenate the body's blood supply and being careful to mind his leg hair didn't pull. I was keeping up with her and enjoying the education. It was so interesting how the body worked and I couldn't believe I was learning all of this for free. Once I got a bit of a groove following Ghislane, they began asking me all sorts of questions about my past and it didn't take long before the conversation led down the darker experiences of my young life. When they found out that I hadn't led much of a normal existence they only probed me with more questions, which being put on the spot answered honestly. The funny thing was they didn't seem appalled at all by my statements, rather entertained if anything. Jeffrey called me a "naughty-girl" with that wry smile of his, and half playful and half defensive, I answered "no I'm not, I'm really a good girl, just always in the wrong places" he then replied, "It's O.K, I like naughty girls" and rolled over onto his front side to expose his complete nude self. He wasn't the first man to show me his penis, so I wasn't shocked at the appearance of his manhood but I was incredibly shocked at his complete ease to present himself with an erection. I tried to ignore it waiting to follow the next directions off of Ghislane, who surprisingly now stood behind me bare breasted. Before I had a chance to even think of replying hastily she began to slowly undress me, while Jeffrey started to stroke his manhood while watching us. She unbuttoned my blouse and removed my bra, revealing my bosoms. Cupping them in her hands she moved her lips across my nipples, licking and teasing them with her tongue making them cold and stiff. Next her hands moved down to my little white skirt, removing the final piece of my remaining uniform. She slid my skirt down my legs with ease, for a moment keeping on my love-heart panties, so they could both take notice of my apparent youth. They even snickered to each other about "How cute she still wears little girl pantie's" Jeffrey said, and Ghislane joined in his laughter.

Acting as my madam, she instructed me to start by licking his nipples and after I had sufficiently pleased both of them, then prompted me to go down on Jeffrey orally while she rubbed her breasts along his body tantalizingly. She moved behind me again this time to remove my panties and start fondling the delicate folds between my legs. I was still in shock from the initial degrading blow. I hadn't even let the reality sink in, it was all too much for me to emotionally handle so instead I hid behind my fears, which I told myself "I wasn't going to ever be worth anything at all and this would probably be as good as it gets for me" after all I thought,

"what have I been trained up for until now". Nobody ever stopped to ask if I was comfortable or if I wanted to stop, no, instead, Ghislane only directed me to conclude the massage session by climbing up on the table to be fixated on Jeffrey, straddling him so he could penetrate me.

When it was all done and over with, I was taken into the steam room with just Jeffrey to get further acquainted, as Ghislane left the room to go get dressed. He asked me to grab his feet and rub them not saying a word about what just happened, like it was all normal and accepted. I listened to him ramble on about the health benefits of a sauna and the history of it, ignoring the fact of the matter of his pretentiousness degrading my spirit. I figured I had gone too far already, what would be the point in throwing in the towel now after I had done exactly what these people wanted.

Whilst we were sweating out our bodies' toxins, and the steam was blasting my burning face I listened to his lessons, entertaining his ego, I let him become my teacher, he seemed to like that. He sounded like a very clever and intelligent man though. Telling me his story of how he made himself an empire of billions from being a middle-class professor to an elite financial advisor for clientele with only billions in their bank accounts and through his so-called "lessons", He became my mentor and I emerged as his pupil, the teacher's pet.

After the sauna we went to the next glass door beside us where the shower was. He turned tap outwards and stood underneath the water as I stood naked and cold from the temperature difference. Instead of asking me to join him under the warm stream, like I thought he was going to, he handed me a bar of soap and asked me to wash his body from top to toe. It didn't stop there I had to massage the shampoo and conditioner into his scalp as well. I was bewildered someone would ask this off of someone else, wasn't it belittling enough having to endure the illicit massage from beforehand but now this. The surprises kept coming that night, as this was definitely not how I expected my interview to turn out, but that's what I had learned in my short time on this earth, life was full of disappointment.

I let everyone else take the power of authority from myself and use me in whatever way he or she wanted instead of standing up and giving myself the respect I deserved, which in turn would've helped me get through life without all of the abuse I ended up coping. Not given the belief in myself from an early age on I suppose is what affected my sense of control. Always letting the one's with power and strength reduce my inner-self to shreds until I was cut so tiny in size I would be completely subdued to only their wants and needs left ignoring mine. The men I had encountered in my short experience with them only repeated their inflictions convincing me there was no running away from the sick world I lived in, not yet understanding it all came down to the choices I had

made for myself, I needed some encouragement and the right words to unlock my very soul.

Jeffrey told me the towels were on the heated rack just outside the shower and asked me to get one and pat him down. Again putting himself first as I sat there freezing while I compliantly patted down his body with the white fluffy towel until he was dried. I nearly expected him to ask me to dress him as well, but not surprisingly that came later down the track too. I dried myself off and wiped the make-up from under my eye's, keeping quiet not sure what to really say and half-embarrassed from the entire evening's events that just took place. I just remained silent whilst we both got dressed until he brought me downstairs where Ghislane was sitting at a desk holding his black leather duffel bag. When she moved from the chair to let Jeffrey sit down, she passed him the bag and began to tell me that I had great potential to be a massage therapist, they really liked my style and who knows where this could lead too. She asked to see me again tomorrow, same time after work. He opened the bag, revealing stacks of brand-new hundred dollar bills separated with rubber bands to count by the thousands. He grabbed one stack and took out two crisp notes, placing them in my hand. He laughed that it was nearly my whole week's wage at Mar-A-Lago. Only there I didn't have to degrade myself as his new little toy.

When I got home my parents were anticipating my arrival. I kept it simple and sweet with my folk's, only telling them of the lessons about the body I had received and the future prospects in massage therapy that lie ahead. Nobody questioned who I was working for and complimented my ability to be a hard worker. I quickly got out of that conversation afraid I might give away a hint of shame in my eyes but no one caught on. I excused myself to the bathroom to have a shower and stared into the mirror for a moment, asking myself if I could really go through with this only to mentally respond by reminding myself this would be as good as it gets for a girl of my stature and limitations. I scrubbed myself rigidly in the shower as if it would wash away the filthiness of the night, but it didn't help, I could still feel their hands in me and all over me and inside of me. Trying to sleep that night was nearly impossible too, closing my eyes only to drift away to flashbacks of the moments I had to give myself to Jeffrey and Ghislane, each replay an exploitation of my vulnerability.

The next morning I awoke feeling anxious about the day ahead, trying to push yesterday's memory from my thoughts, I was quiet for the whole trip to work with my Dad. Before we got out of his car in the parking lot he asked me if everything was okay, I lied, for his sake and mine. My life was being transformed and I didn't even know it yet, but soon enough I would be a brainwashed tool only used for the sexual pleasure of others.

About to be entrapped in the same life I had broken free from only months ago.

Convincing myself in order to succeed I had to step up from being a girly teenager and start thinking like a young woman, it would be my ticket to a great career and a fortunate life. I told myself "So what if I had to bargain my body to this rich old geezer, some girls get themselves through college by becoming a stripper and using their bodies to pay for degrees, others go down even worse paths." I guess it was just another way to fathom the road I was going down, the effectiveness of the lies I forced myself to believe was working as I continued to tell myself I had to make it any way I could rather than ever letting myself sleep on the streets again. I was trading one shocking lifestyle for another, thinking I was choosing the right one. If I could go back in time to ever meet myself I would choose this time in my life. I'd start with a good hard smack to my head to first shake some things up in there and next I would tell that girl she could actually make it on her own if she just worked hard at earning an honest wage and built her life up slowly. There is no rush or time limit to ever stop reaching for achievement. Sadly enough I probably wouldn't of even believed myself anyways, learning my life's hard lessons through the experiences I continued to suffer.

I went to work at Mar-A Lago that day trying hard not to think of what lay ahead in the afternoon too come, but the later the hour got the more distinguished the knots became in my stomach. I spoke to no one of the details to my explicit interview but told one girl how I was so happy I was now officially studying massage therapy, another lie. My friend was surprised and intrigued that these people who could afford the best of the best of therapists in the world chose an untrained fifteen-year-old girl to perform a massage. She never said it in words, but her body language told me she knew exactly why they wanted to use me and it wasn't for a therapeutic reason either and deep down inside I understood.

The rest of the afternoon slipped away quickly and before I knew it I was standing before those large wooden doors again, giving a moments pause but long enough to draw in my breath and exhale some of the anxiety before ringing the doorbell. Juan answered the door again and told me Ghislane would be down in a few moments and asked to follow him into the kitchen. There was a pleasant looking young girl with blonde spirals in her hair that glanced up from the mound of paperwork before her. Her shocking blue eye's and appealing English accent seemed delightful and she introduced herself as "Emmy", Ghislane's Personal Assistant. I introduced myself as "Jenna" which is what most people knew me as and told her I was on an employment trial to become Jeffrey's massage therapist. She had a coy smile on her face that told me she knew exactly what I was on trial for. Something in my gut told me

this wasn't the first time a young girl had been trialed for the same position I was about to fill.

We were only chatting for a moment before Ghislane appeared and told me Jeffrey was ready for his massage. I was led through the extensively large house to the winding staircase that would lead me up to the same dreaded room where I would have to re-enact last night's performance. I wasn't far from wrong. I gave Jeffrey a massage with Ghislane leading the way again, this time we surprisingly made it to the front of his body and she continued to show me how to massage all the way up to his stomach pushing my hands in a spiraling clockwise circular motion to not disrupt the bowels and then we came up to his chest. He couldn't dare contain himself for one second longer, telling me to put my lips on his nipples and give them a kiss. Jeffrey moaned in pleasure and Ghislane started to undress me from behind. Within moments I was completely naked and Ghislane had her top off. She was caressing my body with her hands while Jeffrey moved his hands down to stroke his loins while he watched her and I kiss and touch each other. I didn't know if she was doing this for the sake of his eye-candy but she sure did act like she loved having the control over me telling me what to do throughout the entire threesome. Jeffrey's climax was always the end to our sessions and this time he wanted to have me make him orgasm orally. Afterwards we went for the ritualistic steam-room, this time Ghislane joining in with us for conversation. She asked me to massage her feet this time while we were in the steam room, showing me that Jeffrey wasn't the only one I had pay my homage to. We all had a shower next and then we all went downstairs to pay me and have Juan drop me off back home.

The following afternoon I received a call at work, surprisingly it was Ghislane asking me to come over when I got off of work again. The compliant side took over and I told her I looked forward to meeting with them today, instead of telling her to go screw herself for lying to me and making me degrade myself more each time I saw them. I finished work for the day and my Dad brought me over to El Brillo Way again, where the vultures were patiently waiting in their lair, he wished me well as I hopped out of his big truck, looking ever so much like his little girl again. I gave him a smile and a wave as he drove down the long driveway, waiting for him to suddenly turn back and not leave me alone to my task. I shook myself out of that calamity and put on my "big girls" face.

Juan brought me to the kitchen again as I waited for Ghislane. He offered me a cold drink and some fruit on a platter, I accepted and was grateful for the rejuvenation before I went to work again. It wasn't long before Ghislane approached me from behind with a cold intense look in her eye. I jumped from my seat, feeling like maybe I shouldn't have been eating and drinking while on the job, as her demeanor seemed annoyed

and temperamental in the seconds that she appeared. She told me I would be on my own today as she had business to attend to, so make sure I remembered what she had taught me, as my trial depended on it.

Chapter 5

I walked up the stairs by myself this time, taking in more of the décor, noticing the more I looked around the more I noticed a different girl in each photograph in his collection of half-nude and topless girls on display around his mansion. I couldn't believe how many girls there were, it's not like Jeffrey was much to look at. He was an aging man in his early fifties with shiny grey hair and characteristic lines drawn down his face as if he had seen harder days. With no prospects of ever settling down or having a family of his own, Jeffrey treated us girls like a piece of clothing he could try on for the day and get rid of the next. So why was there so many girls in these photo's? I wondered to myself if I would end up one of those girls among his collection of forgotten relationships and broken promises.

I continued to make my way up the stairs, and as if all of my senses were heightened from my bare nerves being exposed, I could smell the cleaning detergents recently used by the housekeepers, my observations of the shade of lighting through the concealed blinds as I entered Jeffrey's bedroom appeared golden, and the sound of stillness except for the thud of my rapid beating heart all made me more aware of how nervous I was to be on my own. Not that Ghislane was anything of a comfort, but I didn't know what to expect or how I was going to lead myself into upholding my obligation in pleasing him. I would hope for the best I thought, trying to uplift my confidence as I opened the door to the massage room with the typical scene of Jeffrey laying naked facedown in the massage bed waiting for his entertainment. It was de'ja'vous' all over again. Repeating what Ghislane had taught me, with him commenting on what else I should be doing, until it got to the end and I was expected to grant him all of his spoken desires. We finished up with the shower again and he seemed very pleased in my contribution of myself to him, giving in to every request.

He told me to go ask Juan to pay me, as he was lethargic after the massage and intimate affair between us and now was going to have sleep. I walked back down stairs and told Juan that Jeffrey was asleep and said I had to ask him for my pay. He went to Jeffrey's desk and took out the exact amount I was owed without even asking how much I normally get paid. He then drove me home, only to be back the next afternoon.

The following week was a daily routine, providing Jeffrey with massages and continuously being groomed to fulfill all his needs. Often joined by Ms. Maxwell and her assistant Emmy for sexual trysts of all kinds. I was mentally and physically exhausted from the week of working and having to keep up with Jeffrey's strenuous late night activities. I couldn't believe what I was doing but it was all starting to sink in fast. Most nights when I got home, I'd briefly say "Hi" to Mom and Dad before heading straight to my bedroom. I couldn't even sleep well anymore. Closing my eyes at night I would fight the inevitable flood of thoughts, replaying the moments of shame that ate away myself piece by piece. My only reasoning being I just had to keep telling myself it would all be worth it in the end.

This afternoon Ghislane appeared to be in a much better mood. Instead of taking me straight up to Jeffrey she took me to a yellow guest room where Emmy mostly stayed. It had a balcony where Emmy was already outside reading a magazine and puffing on a cigarette. Ghislane lit one up too and then offered me one. I hadn't smoked cigarettes much before, besides trying to look cool in front of one of my friends, but never really took to them, so when I started to cough from the inhalation of smoke, the girls began to laugh and joke about my in-experience. It was an icebreaker for all of us to laugh and poke fun at me. I was then able to give it back to them saying I would rather be an in-experienced non-smoker than an old lady with a raspy smokers cough. I don't think Ghislane was used to somebody giving it back to her, but she seemed to like it, as long as she was able to have the last say. I knew my boundaries and she liked that I wouldn't cross those invisible lines. All three of us chatted like friends and it started to feel like some kind of a strange relationship was budding. After about fifteen minutes of chatting away, Ghislane instructed me to wash my hands thoroughly, as Jeffrey hated the smell of smokers, and to follow her down the hallway to the massage room where he'll be expecting me shortly. I did what she asked and sprayed myself with the body spray that I always carried in my purse and headed down the hall to Jeffrey's room.

When I opened the door to the massage room surprisingly it was empty. I sat down on the already made up massage table and was careful not to mess up the neatly folded towels on the end of the bed. It was a good fifteen more minutes before Jeffrey made his appearance. It was strange seeing him in clothes for the first time. He wasn't wearing what you'd expect your typical billionaire's attire to be. He was wearing a pair of sweatpants and a Harvard sweatshirt, which he began to remove immediately. This time he wanted to commence our session in the steam room, so I began to undress as well. We went into the steam room and he pushed a few buttons and the steam began to pour in from the marble

wall's built in jets. There was a bench coming out of the wall also made out of marble that went from either side of the room and had a step underneath it where I was instructed to sit on so that I could begin giving Jeffrey his massage. Our conversation started off about simple things like how was your day at work, and I asked Jeffrey how his day was lounging around, just being polite to each other. He was acting out of character being a lot more attentive and conversing with me about other things than sex or massages for once. Starting with his heels, ankles, toes and arches in the soles of his feet I massaged all the way up to his calves. It took a lot more strength to massage in the steam room without oils or lotions and the constant blowing of steam in your face making me twice as exerted. I was beginning to really start to heat up when the door to the room suddenly opened to reveal two naked women. Ghislane and Emmy acted as if they came in to join us for a steam bath, but my instincts were telling me otherwise. At least the cold burst of air and escaped steam revived me a bit.

So there was Jeffrey and Ghislane sitting on top of this marble bench, each with a young girl at their feet. Emmy and I continued with the massage until they were ready to head into the shower. There were two showerheads that Ghislane and Jeffrey both stood under while they were being lathered with soap bubbles as we washed their bodies. After the shower Ghislane led us into Jeffrey's bed to finish today's session with Emmy, Ghislane and I performing lesbian acts of foreplay on each other while Jeffrey laid back and watched. Stroking his manhood in much delight, he brought himself to climax, and the session was over within moments. We all got dressed and went downstairs to the kitchen for some refreshments. Like nothing had happened at all, it was all so bizarre for me, the whole ordeal with them since this all began. I couldn't understand why Ghislane and Jeffrey had such an openly intimate relationship but yet never regarded themselves as partners. They rarely kissed and never held hands or even slept in the same bed. It was more like a sexual arrangement between the two of them. She brings in the girls for his peculiar taste and he supplies the lavish lifestyle she was accustomed too before her family lost all of their fortunes. I wasn't sure how to act or feel, always obliging to their needs but reserved enough not to get attached, as if there was this invisible hierarchy and by instinct I knew my place.

We all hung out in the kitchen for a while before I asked when Juan could bring me home as I had work in the morning and was tired. They said no problem and called Juan on the intercom right away, but said we'd all have something to talk about tomorrow. I knew it had something to do with my employment trial and from the way they were acting tonight, I could only assume I got the job, but you never know with these

types of people. Their friendships and partnerships can change like the weather.

I went home that night still confused on how I could let myself sink so low, I had to put on an act like I enjoyed submitting my body and being their new subservient plaything all for the fact that I was making anywhere between \$200-\$400 for just a couple of hours. Then spent the rest of the night regressing on the entire event in my head over and over again. I battled those thoughts with the hope that I was receiving a profession out of this and making good money in the meantime. All I had to do was keep lying to myself long enough until I eventually believed it.

Arriving at Jeffrey's on time the next afternoon, as I always did, understanding punctuality was a sign of respect and I wanted them to feel as if they had my deepest appreciation for the once in a lifetime chance they had given to a girl of my history. This time when Juan answered the door he told me Mr. Epstein and Ms. Maxwell were waiting for me upstairs in the massage room. I began my hike up the familiar spiraling staircase and through to the room where my arrival was being deeply anticipated. They were already in the steam room awaiting me to join them. I undressed out of my uniform and folded them in a neat pile, which I placed upon the marble basin. Having one last look in the mirror before I exhaling a deep breath as if I was plunging into deep water, I knew today was a big day. I either accepted their offer and trade my morals for opportunity, or walk away with the prospect of one day many years from now trying to make it on my own which I knew endowed hardships of there own.

So confused about what decision to make, I just opened the door to the steam room and let them do the talking. Used to the routine by now I sat below Jeffrey and began to massage his feet and legs as I listened in on their ongoing conversation about travel plans for the next few weeks. Ghislane and Jeffrey turned their attention to me and he asked me how would I like to go see the big city of Manhattan. I told them I had never visited New York before and it sounded like an adventure but my job at Mar-A-Lago was only a summer job and wouldn't be able to get the time off, especially that summer was so busy anyways.

Jeffrey then made his announcement, that I should just quit my job at Mar-a-Lago and become his permanent travelling masseuse. He then further persuaded me with all of the luxuries that came along with my acceptance. Rather than being paid \$9 dollars per hour at my current job I could be earning \$200 dollars per massage, which he even said could be a few times a day. Tomorrow we could be leaving Palm Beach together in his private jet first heading to his residence in the upper east side of Manhattan, also the largest mansion in N.Y, and would next be setting off to the Caribbean, where he owned a secluded island just past Little St.

James for a bit of relaxation. The temptation of his grandeur offer wasn't hard to give into, my vulnerability to be lewd into his grasp seemed comforting at the time. The idea that females were nothing more than an empty shell of beauty bound by only a body to offer was a notion I had accepted a long time ago with my first teacher, Ron.

My reaction had to be more than amusing for their egos, even though I was excited to be traveling I could only imagine the likeliness of having to be at their beckon call as well. In my head I just told myself we all do what we have to do in our lives to succeed no matter what it takes, and with no one knowing the truth, I had no one to talk me out of it. I accepted his offer and knew from here on out I would be his servant to his sexual desires until one day I would gain my credentials and only then could I go out on my own and make it in this world that when so young seems so unconquerable. The night advanced into the usual grooming of his requirements, for the next hour and a half being exploited to satisfy Jeffrey's every sexual whim.

My mom cornered me that night, before I had a chance to avoid speaking to anyone, heading to the shower then my bedroom, like I had been the last week. She knocked at my door with a hostile look in her eyes, "Virginia, what exactly does an older couple want with a fifteen year old girl, who has no credentials and with no experience in massage therapy?" She used that stern tone of voice that she's always had, when I was in trouble.

Thus, as impressionable as I was, my blue eyes batted their innocence in her direction and I flashed her a girlish grin selling her the pitch that I had been given earlier that night. Not mentioning the other side to the glamorous lifestyle I would soon be living in. I told her about the money I'd be earning, the places I'd be seeing, the people I could meet and most of all the trade I'd be learning. It all sounded so good, except it was a bunch of lies I had to tell her and myself to otherwise convince us, that this was a once in a lifetime opportunity, and I had to take it.

She asked when all of this would start, and I as shocking as it was to me too, I told her I had to go start packing. We were leaving the next morning off to N.Y.C. At fifteen most girls would be sucking up to their parents to go to a high-school dance or to go on a date to the movies with a nervous chap, but I wasn't even asking her. I was simply letting her know that I would be away for the next couple weeks, maybe three and would keep in contact when I got free time. Her daughter was lost a long time ago, and she just now realized it. Backing out of the bathroom, with nothing she could say, she left me wondering to myself who I was becoming.

Instead of driving me to work the next morning my Dad dropped me off at Jeffrey's mansion, he told me not to worry about calling Mar-A-Lago,

he'd take care of it for me. We said our good-byes outside in the driveway, Jeffrey even coming outside to meet with my father to shake his hands and assure him that his daughter will be more than looked after. I hugged my dad tightly, feeling like I was on the verge of a steep cliff, when he let go, so did the last of my innocence.

Juan drove Jeffrey, Ghislane and I to Palm Beaches' Private Airport and the luggage handlers escorted us on the tar mat where we all boarded on Jeffrey's black jet. Larry was his main pilot, he had shiny grey hair and long lanky legs, but a very sincere smile that instantly made you feel at ease. He greeted us at the staircase that led into the main cabin. It was as lavish as I imagined it would be. The seats were enveloped in the finest beige leather with polished wood grain finishes and there was a kitchen in the back with an adjoining toilet. Jeffrey saw the amazement in my eyes and to make it more thrilling he brought me up to the cockpit and let me watch with a bird's eye view of the take off. I was on a natural high when I came back to the cabin and was instantly brought back down when Jeffrey rested his bare feet on top of the reclined seat and instructed me to get to work and start massaging him. My future was in his hands now, so when he wanted something, I wouldn't hesitate in giving it to him.

Chapter 6

Upon our arrival at New Jersey's Private Airstrip, the driver Jo-Jo met us. His name was most likely shortened for something of his oriental decent. Jeffrey liked to shorten the names of his multi-cultural staff into American names. Even Juan and Maria were known as John and Mary. We arrived in the Upper East Side of Manhattan. His principal place of residence was the largest home in Manhattan, eight stories of opulence. It used to be a Private School for boy's many years ago, until Les Wexner, Jeffrey's best friend and mentor bought it for him as a mysterious gift.

There were two large Chinese gargoyles outside the entrance, and beside the heavy looking wooden doors there was an intercom with a camera overlooking us. I walked up the concrete steps into a realm of wealth, glamour and most of all influence. My eye's glistened at the splendor of his palace. Caramel colored marble tiles spread through the first floor, where his gourmet kitchen and dining hall were also located. Then I came to this sweeping staircase that curved into the next level where Jeffrey and I went into his office, even though it looked more like a museum exhibit. Ancient draperies that told lascivious stories of their own covered parts of the elevated walls, and the remaining wall spaces were taken up by rows on top of rows of books. He loved to read, as he

often found it hard to sleep and was comforted in the early morning hours with his literature, or sometimes in other ways I would come to find out. There was a mantle piece and a sofa with two armchairs next to the grand piano that flaunted more of Jeffrey's beautiful conquests, young women posing in salacious pictures, suggesting I could be easily replaced next to one of those girls if I failed in keeping him satisfied. There were also some pictures with recognizable political and royal figures either shaking Jeffrey's hand, or with an arm around each other, even one with Jeffrey and the Dali Lama, although his church was the bank. He liked to use his power, wealth, and money to manipulate everyone in his life.

He made a phone call that sounded business like and I didn't mind, I was quite enjoying taking in all of the beauty around me, I was blinded by all of it. I was still waiting for him when, Ghislane came in. She asked me what I thought so far of my trip to N.Y.C, I knew she was talking about the house, she loved to gloat, even though none of it actually belonged to her, she wanted everyone to believe that it did. I complimented her on the mid-evil looking tapestries and a few other adornments, when she cut me off mid-sentence to compliment it herself, telling me the history about one of the 17th century tapestry's which to an unsophisticated eye, looked to me like a rug on the wall.

Jeffrey hung the phone up and walked over to the sofa where we were sitting next to the mantle piece and took a seat on one of the armchairs. He didn't seem worried from the phone call but his mind was definitely somewhere else from the hard look on his face. We all spoke for a few moments more about the splendid décor before Jeffrey had enough small talk and needed some of his own relaxation time. He told Ghislane he was going to show me to the massage room and he'd be back in a couple hours. She agreed he looked like he could use some time to unwind and with that wry grin of hers, she gave me a look that told me precisely how he was expecting to be relaxed.

We left his office all together, Ghislane going downstairs, and Jeffrey showing me to the lifts. The lift looked like it's original that came with the school. It was made out of brass antique with archaic cuts throughout the arches at the top. It wasn't the only lift in the house, but certainly the most beautiful. We walked down a long hall carpeted in a royal red and golden trim, passing by a bronze pagan statue of the horny little goat God "Pan". How adequate, I thought, fit Jeffrey to a tee. We walked into this dimly lit room. Another daunting chamber that looked like we had stepped back in time to the dark ages. It took a second for my eyes to adjust to the darkness, and Jeffrey beckoned me to follow him through the room to the open adjoin shower, toilet and steam room. The room was in black marble to accent the dreariness, and smaller than the one in Palm

Beach, but it had it's own witchery feel to it. Another unseen side to this Man I was coming to know.

We both undressed and I followed Jeffrey into the steam room first. He loved feeling clean, teaching me that the steam would deplete the toxins from your skin, which was great during a massage when your blood flow is being replenished. I grabbed his foot out of instinct, knowing I had to be constantly on alert to keep this man satisfied. He looked down at me with a nod and reclined back against the wall as the steam pored in, this was his idea of alleviation. I worked up to his calves and within a few more minutes, he said he was ready for his massage on the bed. We got out and towel dried off, both still nude, he asked me to stay undressed, then we headed to massage bed in the middle of the room. He lay down on the bed and told me to turn on the CD player on the wall hutch, where all of the oils and lotions were set out, I hit play and a collection of mixed classical symphonies began to fill the silence. I could tell he wasn't in one of those moods to be uplifted with idle chat, so I remained silent, letting him enjoy my slow movements, making my way up his body. My instincts told me I was right about his mood, as he seemed to appreciate the quietness of moment and the leisurely of the strokes I was using to massage him. When I got to his scalp he turned over, and grabbed my hand to put on his erect manhood. No words spoken yet, I took the gesture and initiated what I had been taught over the last week. While pleasing my master his hands groped my young flesh, penetrating my insides with his fingers, he was only concerned with what he wanted, as if I was a new car out for a test drive and he was pressing his new gadgets. His soft moans were soon brought to louder heaves of breath and my job was done. No intimate kisses, or sweet pillow talk. He showed his appreciation with money, never attachment. We concluded with a shower and he told me he had some business to conduct. He walked me to the lift and told me go to the next level and my room was the first one on the right, it had an intercom in which he can contact me when needed.

I hit number 5 on the lift and took his directions to my room. I opened the door to this massive loft, the size of an adequate house. I walked down the long hall and my eyes took in the magnificence of my surroundings. It was a room fit for royalty, and later would find out had been stayed in by some. The room was trimmed in gold paint and had another eerie tapestry on the main wall as feature. There was a T.V and a huge king sized bed, with goose feathered comforter and pillows.

All of the glitter from Jeffrey's lifestyle he was offering me finally covered the last bit of sight I had left and I let go of my consciousness. Excited by my enthralling day, not having anyone around to have to act reserved, I jumped into the soft bed and lay looking around, thinking about how quick life could change based upon one swift decision. Dazing

into the artistry, the intercom buzzed on the telephone next to the bed and it was a housemaid letting me know Jeffrey wanted to see me in his office now. "Already" I thought to myself, I was just getting settled in. I was worried I was going to get lost in this ancient museum, but I got myself back to his office with no trouble, it was kind of hard to miss. I knocked at the slightly ajar door and Jeffrey called for me to enter. I walked over to his desk, where he was just ending a phone call and he opened his duffel bag full of money. "I'll be out at my other office for most of the day, so instead of being locked inside I thought you should go do some sightseeing for the day since it is your first trip to the Big Apple" He didn't count how much he was giving me he just handed me a bundle out of the banded \$100 dollar bills. He knew just how pull the right strings, making me squeal in delight and give him a kiss in the cheek, since we were never really emotionally intimate, it would be odd to act in any other way, but he seemed to like it.

I ran upstairs to get dressed for "City" shopping and put my make-up on, then hit the streets of N.Y.C, looking for a place to start spending this load of dosh. When I got to the end of 72nd street on 5th Avenue, I had no idea which way to turn, left or right. I thought I'd just follow the lights past Central Park and see the local sights on my way. My eyes were once again peeled back in splendor. I had never imagined a place so busy with the hustle and bustle of all the walks of life. My first stop was to buy a disposable camera and I was off taking photos of every wonder that caught my attention. I didn't do much shopping as I had planned too; I was having too much fun exploring this capacious metropolitan.

When it started to hit dusk I began walking back to Jeffrey's but not before stopping off to enjoy a giant slice of pepperoni pizza, it was the best I had ever had, and considering I was going back to Jeffrey's chickpea and tofu salad's or such. I really hated the healthy cuisine served by Jeffrey's personal chef. I was a naturally skinny girl, never watching what I ate and to eat that food I might as well have chewed on hay. I strolled back to Jeffrey's and was missed. Ghislane scolded me "You shouldn't have been gone so long young lady", "We need to know where you are at all times, you are on call for Jeffrey" I started to apologize, feeling guilty, I didn't want them to think I didn't take my job with them seriously. She cut off my explanation with a short conclusion to this conversation "We will get you a cell phone tomorrow, so we can always find you". I thanked her for her generosity, and she dismissed me to my room. So I wasn't even needed after all, it was just a way for her to place me deeper in their control. The next few days I was on call, as Ghislane said I'd be. Venturing out to the city for only an hour or so at a time, I looked most forward to my outings. I would return to Jeffrey's

mansion to attend to his sexual desires and when he was finished with me, I'd be off to my adventures.

On the day before we were to be heading back to Palm Beach, Jeffrey had a new proposition for me. I could make double the money I was making, if I would look for pretty girls and convince them to come back to Jeffrey's to be further persuaded with money to engage in bi-sexual and sexual acts with Jeffrey and I. I asked him how does one actually propose such a thing to a complete stranger? "Well" he said in a build up to another kind of lesson. "If I were you I would use your charm to entice them and my money to bring them, I would tell them you work for a multi-billionaire who has a taste for young, beautiful girls and with his contacts in the acting, modeling, or rich husband world, your boss could help them. All they have to do is come meet me first." If I wasn't so naïve at the time I would've seen that's exactly what he was doing with me, my prospects were massage credentials, but with too much pain from my past, I could only have hope. Not that I was a shy girl, but picking up girls for one reason alone, only to be endorsed for her body, didn't sound like something I could do. But not wanting to displease my master, I told him that I would give it a go. You could tell he was instantly excited with my agreement, he started to reveal the politics of what kind of girls he was looking for. He wasn't into multi-cultural girls, a very chauvinistic perception; he said they had to be uniquely gorgeous to be accepted by him, but definitely no African-American girls, he was racist against anything different to his kind, a very narrow minded way of thinking for such a supposed brilliant man. The list went on and on. No girls with tattoo's or piercing's, or gothics, no drug users, or prostitutes. Basically he wanted everyone's daughter that looked like the girl next door, with blue eyes and blonde curly ringlets. I just nodded and smiled, wanting this to be over with and move on to another conversation, but so worked up from our previous talk, instead he persisted to show me exactly what I was good for to him. He took me up to the highest loft in his large mansion and he lay down on his large bed, expecting me to know exactly what he wanted done. As always, I complied. Part of me hating him for having to degrade myself to be so subservient to his sexual whims, and another part of me was telling myself to be grateful for the opportunities I was being given.

The battles in my head were beginning to cause me too much anxiety, when we got back to Palm Beach, I asked my Mom to make me a doctor's appointment for some headaches I had been getting lately, so she wouldn't question me. I walked out of the doctor's with a prescription for a mind-altering anxiety tablet called "Xanax", not only did it help with anxiety but it also acted as blanket over terrible memories. So when I had to perform degrading acts, I would take a few pills and forget what

happened within the next hour and be able to become someone without a battling conscious.

I spent my sweet 16th birthday on his island in the Caribbean next to "St. James Isle" he liked to call it "Little St. Jeff's", his ego was as enormous as his appetite for fornicating. I was given a birthday cake and a new collection of designer make-up from London. Ghislane made a joke after I blew out my array of candles and said, "I'd be soon getting too old for Jeffrey's taste, and soon they'd have to trade me in." She was only half joking in a sad reality though. A few days after my birthday, a girl was flying out to the island to join us for a few days before flying back to N.Y.C. I was introduced to a pretty girl a few years my senior, named Sarah. She had long ash blonde hair and big brown eyes that hinted she had a cheeky nature. She had known Jeffrey before I had, and he was supposedly trying to help her get an acting job in L.A. She was obviously accustomed to the lifestyle he provided her, making it ever so apparent with her prompt attention she lavished on him. She would do things like strip nude and bathe around the swimming pool, taunting him for sex. She was good at what she did, even putting me at ease with her cool persona and funny jokes. Jeffrey told me privately that she was one of his best at procuring young girls into her entrapment and delivering them to him when he was in town, and when it came to time in the private chambers with Jeffrey, Her and I, it wasn't hard to comprehend. She was devoted to the moment, giving Jeffrey every imaginable lustful desire he could fathom. On the last night there we all took a trip over to St. James to go for a stroll, odd I thought, it was past 7pm and Jeffrey rarely strayed out past then, unless it was some event or dinner party. While Ghislane and him looked the average couple strolling arm in arm through the streets, he said to Sarah and I, "Why don't you two hit the night club here and see if there is anyone interesting to bring back for the evening?" It was more of an order than a request and then I knew why we came out tonight and why Sarah was invited, tonight was all about training, and Sarah was going to show me the ropes in picking up girls. Although there was no one to accustom to Jeffrey's distinct taste to bring back, watching Sarah flirt from girl to girl like a floating butterfly, gave me enough insight into what I was expected to do.

Within Months I had become his handy little helper. Not only would I run to his beckon call, but I also aided Ghislane in bringing in more girls to keep the appetite of our sexually starving chief from going hungry. I once asked Ghislane, why she did what she did for him, instead of having a common monogamous relationship and getting jealous like normal partners would? She replied simply "It takes the pressure off me having to do it". That said it all, we were all under the shade of Jeffrey's money tree, and not even someone like her could escape from its lure.

Just like Ghislane had trained me it was now my job to reiterate that onto other girls and thus the cycle of girls trying to climb the chain of hierarchy would start all over each time I brought a new one in. The sessions rarely differed much. They would mostly start out with Jeffrey on top of the massage table already naked and me leading a girl into massaging him until his instructions came to remove our clothing and if they agreed to that, then Jeffrey knew he had them in his pocket, and could do what ever else he wanted. He was never turned down in the many years I stayed with him. Never being shy, he would tell us to start kissing each other or depending on what he wanted we would perform erotic acts sometimes with him fondling us, or just masturbating while he watched. On explicit occasions, sex toys would be used on us girls, making it all the more exciting for him to observe. Ending with a payment of \$200 for the new girl and \$400 to me for bringing her. He would then wait for us to leave before adding the events details of names and payments in a little black diary he kept with him wherever he went, so if he were in anyone of the city's he lived in, he would always have contacts for sex.

I was slowly climbing the ladder, as Jeffrey was happy taking me everywhere with him, within the States. Merely at home I distanced myself from my Family altogether and with Jeffrey renting me an apartment in Royal Palm Beach as well as a plush furnished apartment in N.Y.C, there was hardly a need to see them. I just couldn't face everyone thinking they all knew what I was really doing travelling around with a man old enough to be my grandfather who supposedly only wanted me for massages. Much further convincing myself of the lies I told myself, I took a liking to the Xanax, it felt like it was all a dream at times, even meeting up with old contacts from school years who experimented with drugs. I was flying around the country, seeing so many places in America I had only heard about in Movies and making more money than anyone my age and loving it. My friends didn't believe the lies I told them about only being a massage therapist, some of them even asking if they can meet Jeffrey too. At this point in my life my heart went missing for a while and I stooped so low, I was even bringing my friends, I just saw them as easy commission. When I wasn't playing servant to my master, I was partying hard, eventually using ecstasy pills, acid, and marijuana to disillusion the times I would've had away from Jeffrey to think about what I was actually doing with my life. I realized something one day while I was alone, although I had Jeffrey to attend to sexually, it was not gratifying. I needed someone to come home to, someone I could call my boyfriend and that showed me emotion not just a job to get done.

Chapter 7

A knock came to my apartment door one lazy afternoon while we were in Palm Beach. I looked through the peephole and didn't recognize the once familiar face. I asked from behind the closed door "Who is it"? The voice of the reply was one I wasn't anticipating to ever hear again. It was my Junior-High crush and childhood friend, T.J. The last time I saw him I was a runaway and he had let me stay at his house for a few days, telling his parents nothing, he kept me hidden away in his room. At nightfall he said to knock on his window and I could jump through and stay the night. Until I was picked up by authorities during school hours and questioned why I wasn't in school they did some resourcing finding out I was a runaway, then delivered me back to my angry parents.

"Oh My God- You finally answer your door girl", and in a whirlwind, T.J stormed back into my life. Even moving into my apartment, secretly, within two weeks of his arrival. He had changed so much from the last time I had seen him. He used to be this hard looking rocker type, now he was cleaned up wearing preppy clothes and shooting out Tupac Lyrics. He had the same old big brown eyes though, and when he told me he had heard I was back in town but he was unable to ever get ahold of me he just kept knocking at my door every so often, I was sold. How sweet I thought, he must care about me if he was so intent on approaching me, not even thinking he would've spoken to the girls from our junior-high circle and they would've mentioned him I was back in town, what I was doing and where to find me. We were a drug-induced romance, which budded from fake emotions the affects made us feel. He got what he wanted, a free ride and not having to work, and I got what I deserved, a man who could let me go away with this multi-billionaire I regarded as my second boyfriend.

I didn't want to alarm Jeffrey in me having a boyfriend so I kept it quiet, until during a massage I was giving to him one afternoon. We were having a conversation about some of my friends, the party girls I had brought in to meet him. Jeffrey started asking questions about the different types of drugs they used hearing them speak about it in his presence. "I thought a person on drugs would be all strung out and looking like hell, but the girls you know look great" he stated face down during the massage.

That's when I told him I had been dabbling in ecstasy lately too, and I thought it was the most amazing feeling one could even fathom. I tried to describe the euphoric feelings it gave me and even joked with him about wanting to pet anything furry that was around and then there was the constant need to flick my tongue-ring around my mouth. It was great

having such an open conversation about things Jeffrey had never experienced before and he seemed okay with everything I was telling him as we were having a good laugh together, so I thought I could push it a bit further and tell him the truth about T.J. since it was bound to come out sooner than later I'd rather not the latter, when it would look even worse that I kept the truth from him for so long.

"Well why were opening up about things together", I continued by saying "I had met someone from my past and we have been hanging out a lot lately. When I haven't been travelling with you I have been with him and I was wondering if you minded if I started to see this guy." He started to laugh out loud, "Are you serious? Of course not, no one in this world is monogamous, why would I expect you to be?" I was smitten with relief, but a little bit disheartened when I heard him speak that way and I wondered to myself if he'd had his own personal encounter with heartache.

Of course the evening concluded in the same way it always had, the only reason I was really even there in the first place. Upon his request I straddled him on top of the table and let him explode with pleasure inside of me. Thinking the entire time about T.J. I felt so terrible but I quickly had to wipe the thoughts of guilt from my mind not to give Jeffrey the wrong impression. So I had myself busy with two men in my life, but that's not what I really wanted for myself. I wanted an occupation that would eventually set me free from depending on a man as my source of survival.

I asked Jeffrey before I left for the evening, when my real training was going to begin and he liked my assertiveness. I thought it meant to him that I was taking my job with him seriously, but it was all part of his master plan to keep me by his side. Within a couple of weeks of my persistence, Jeffrey introduced me to a couple of real working massage therapists, not only with credentials but with their own clientele too. I was in awe of their teachings, it all made so much sense about the body and what they were saying. I felt like I had picked myself up out of the lurches and had a direction again.

I was in the middle of another training session, with Jeffrey the recipient as usual, being it was rare for Ghislane to ask for a massage unless of course it was for Jeffrey's own pleasure to watch the punch line of the session, when I was shocked to hear Jeffrey ask one of the therapists to now remove her shirt. He had no shame I thought. Even though she was above his usual age criteria, she was still a pretty woman in her early 30's with curly blonde hair and had an athletic body for a mother of two children. She didn't hesitate in his request. It looked like something out of a role-playing porn scene with the therapist removing

her white uniform to reveal her beautiful nude body and a much darker side to her personality.

I couldn't believe it at first it was such a state of shock and I began to question myself if this was normal in the massage profession to expect this kind of clientele to request such degrading tasks even though they were professionals. At the end of the session she was paid \$300 dollars an additional hundred for helping to train me as well, and I was paid my usual \$200 dollars then we were both invited by Jeffrey to join him out by the pool for a cool dip. With Jeffrey making a few phone calls while her and I undressed again for a swim, I wanted to ask her a few personal questions about what she's come to learn about the Massage Therapy game, but I never got the chance as we were joined by Ghislane moments later. She was asking how my training was going and booked the therapist in for herself in the following morning. Where she was invited back to do another training session with me. It didn't take me long to figure out why.

I was at my apartment when I received a phone call from Jeffrey, I thought it was the usual call to come over to his house, but he surprised me. Instead I would be going to the exclusive hotel in Palm Beach tonight, The Breaker's, where I would be meeting my first ever clients. Only told their first names I was given some instructions and the address where to meet Glen and Eva. They were a married couple with one on the way. I was quite concerned when I heard she was pregnant, being I really didn't know the body that well and didn't want to inflict any wrong doing on the unborn baby but Jeffrey insisted I take this job. Just massage her gently where she wants to be rubbed and to save all of my energy for Glen's massage, since it was going to be a four-hour job. In an emphasized tone of voice I was being coached by Jeffrey to treat Glen with exactly whatever he wanted, just like I do for Jeffrey himself. It was my last bit of preparation before he sent me out to his friends and my first taste of responsibility in upholding his reputation.

At around seven pm I took a taxi to the address I was given and found them on the residential side of the giant hotel's extensive property. When I arrived in their apartment it was a far cry from the lavish place I was expecting, still really nice but had a cozier family feel to it. It was just beginning to get dark when Eva and I went into the Master Bedroom and she undressed to reveal the first naked pregnant body I had ever seen. It was fascinating to see her in the later stages of maternity, and strangely enough it was a miraculous and wondrous sight. She was a former model and one of Jeffrey's many entourages from his past that had gotten to old for his taste and was married off to a wealthy colleague of his.

Lying down on the bed I adjusted the pillows to try and make her more comfortable and I began to massage her as Jeffrey had instructed me to,

softly and slowly. So at ease with her nude body she even asked me to massage her swelling breasts, in a non- sexual way. Not knowing any other way but that way, I was trying to oblige in her request doing the very best I could to relieve her but couldn't help but giggle to myself at the very sight of this. She said she was very happy at the end of the massage and rolled over to go to sleep, asking me to turn out the light at the end of it. I closed the door gently as if not to disturb her, and went to find my other client.

The apartment's lights had been turned out for the sleeping children and I found Glen awaiting for me in the lounge room where I had to call out "Excuse me?" as I couldn't see him in the dark. There was a throw rug on the ground that he had already placed out as he began to strip down in preparation of the massage. Lying frontwards facing me with his exposed and ever growing manhood, I asked him to roll over to begin the massage. He complied with a cheeky smile and from his eagerness to show he was not shy indeed, I already knew where this was going to end up.

I found it much more strenuous to massage on the floor but I wouldn't let that hold me back I wanted to have a career and this being my first ever clients, I didn't want them to disapprove. Nearly four hours after I had gotten there I was still hard at work. Mentally preparing for the end of the session he let me know when he was ready to begin the other side to my job and just like Jeffrey did the first time, he requested me to take off my clothes starting with my shirt. When I complied, the requests kept coming in and before I could change my mind and run away, I was having intercourse with this man that was so comfortable doing all of this while his pregnant wife and children slept in the room beside us. When he had climaxed, we both got up and dressed and he paid me a large tip even though Jeffrey would be the one to actually pay me for my time spent there. Just like it had all started, it had also ended so quickly and now that was that. I had to accept what my duties were and now I could go back to Jeffrey who would be further pleased in my demonstrations to keep him happy.

I was called the next morning to come over to Jeffrey's mansion that afternoon for lunch, a swim and of course a massage session. Knowing all too well they'd be expecting the gory details of last night's events with my new clientele. I came there at 1pm as requested and sat down for a light lunch and a swim. Jeffrey was mostly conducting business from his offside pool office, but he came to ask me if everything went well the night before. I told him I did everything asked of me and I am quite confident both my client's were more than pleased with me. He gave me a quick grin, before he headed back to the office, throwing a purple grape down his throat as he walked away.

Lying out on one of the pool decks blue and white striped lounge beds I was waiting for Jeffrey to finish his business so I could give him his massage. He never took too long with his work, unless there was something wrong and then we would all have to wear his mood but today he seemed fine though, when we went up the stairs he told me we would be leaving for his ranch in Santa Fe', New Mexico in the morning and I'd need to be packed and ready tonight. They loved leaving in the spur of the moment, Jeffrey once said he checks with his pilot Larry on the best weather before he heads to a different destination. I enjoyed spending time at his ranch being it was my favorite of all of his residences. He had a lavish Mediterranean looking castle on top of a hill that over looked his extensive 7,500 acres of property. It has an indoor pool, gym, and all the trimmings of extravagance I could only imagine. I had a great time on the quad bikes, Sarah and I often got scolded for tipping one over going to fast or trying to go up a steep hill, but we knew those weren't the things he cared about, so it wouldn't matter. My favorite of it all was his little town with it's own fire station and truck, stables full of horses, and little cottages where the housekeepers and ranch hands lived.

On my own time I would take one of the quad bikes down to the stables and saddle up on one of his beautiful horses and go for a ride in the open terrain. It was coming up to the end of a very cold winter and it still had the snow covered mountaintops and brisk air that I loved to take in during my many trail rides. I have been an experienced horse rider since my childhood, and could honestly pinpoint some of the best memories of my life being on the back of a horse. I acclaimed with thrill in my voice "Great, I'll get packed as soon as I get back to my apartment" he threw in "Pack for a few weeks, as we will also be making a pit stop to L.A for some business afterwards and then to N.Y.C." I was used to these round trips with him, it was great as I was saving loads of cash and about to buy myself my first car.

Jeffrey, Ghislane, Emmy and I all left the following morning, as planned. Arriving in only a few hours at his awe-inspiring Santa Fe Palace was always a delight. Still frisk in the air, my petite frame looked even smaller in these gigantic overcoats. Nonetheless I was looking forward to spending time out in the fresh clean air and open land. After a few days of leisurely spending our time on the ranch, we went to the Indian markets in Albuquerque for a bit of shopping and sight seeing. Jeffrey wasn't the most off road kind of guy, so when we went sight seeing it was more like museums, boutique shopping, and local art galleries. Still a splendid trip though. With me picking up a few nifty collectables to bring back for my family and knowing how much my mom loves Indian apparel, I thought it would put me back in her good books for awhile, I hoped at least. There was some lengthy time to put a

little water under the bridge between my folks and I. With my life heading in a different direction I didn't see any use in holding on to so much hate especially that I didn't even have to see them that much.

We got back to "Zorro Ranch", the name Jeffrey chose to call the massive land he bought to build his fortress on, and Jeffrey told me that he was looking forward to one of my famous relaxing massages and with that notion he gave my bags of shopping to one of the many housemaids who greeted us at the front door and asked her to bring my bags to the exquisite room I was staying in. We headed straight downstairs just past the massage room and gym there is an indoor heated pool, shower and spa. First Jeffrey wanted to warm up in the spa underneath a decorated ceiling of clouds and blue skies. Starting the massage in the spa I rubbed his feet while he reclined into the spa's jets. We spoke of the museum and some of the knick-knacks I had bought and I thanked him for the turquoise earrings and necklace he had got for me as a gift, joking about not ever knowing what to get for him, being that he was richest man I'd ever known. By no far means did we ever have any kind of a mutual respectful bond between us, but there was a significant softer side he began to share with me that was different from how he treated his other girls. Maybe it was my feet that filled the shoes for that time being, or the fact my novelty hadn't worn off yet, but what ever it was I was getting confused from the double-sided life I was leading.

He got up from the spa tub shortly thereafter and asked me to come wash him in the shower. It was nothing unordinary to me, I was used to his need to be nurtured and pampered. I performed his request with a cheerful mannerism, letting him think I was taking care of him out of my sheer sweetness. I got the towels ready for him to get out of the shower and towel dried him, patting his skin instead of rubbing as previously instructed. "You know you have a very maternal instinct, you'll make a fine mother someday", he would constantly acclaim at my gentleness. "I hope so" I replied, I would love to have my own babies one day, but not any time soon". Laughing at the very thought of that.

We walked up the steps and through the French doors into the gym's adjoining massage room. It was smaller room than in his other houses, placing the emphasis on the large massage bed in the center. I grabbed another clean towel to keep him warm while I prepared the music, lights, and oils. He liked me to use mostly lavender or other aromatherapy scents, which reminded me of woodlands in the spring. Always enjoying the beginning of the massage, I put my heart and soul into training in my profession. I could just close my eyes I would see only with my hands the areas that needed the most work, and even though I wasn't a professional yet, Jeffrey could feel and told me there wasn't many that could please him during a massage being untrained. I'm sure now it was just

something he'd say nice to all the girls, but in the time I had known him I could honestly say it wasn't like him to compliment girls in any other way than regards to a sexual performance or their looks. I was flattered at his praise and when the massage was over, so were the sentiments. I was back to being used for my body and what I could do with it.

With him satisfied and off for a nap, I could go do what ever I wanted, like usually I would go down to the stables or something adventurous, but today I was in a melancholy mood, just wanting to relax and unwind myself in a giant tub in my bathroom. I got out some of the oils I used on Jeffrey putting them in the steaming water and popped two of my Xanax pills, forgetting about my troubles and focusing on the quiet moment at hand, just wanting to soak up the peacefulness of it. Nearly slipping away to sleep in the tub, I was startled when I got the call on the intercom to come down for dinner.

Everybody seemed in good spirits at dinner, which helped to lift mine. We all ate our meals and went into the movie room to watch a newly released movie. It was a ritualistic scenario, most nights that everyone was at ease we would all sit in one of his various located movie rooms and hang out together. Just as he always would Jeffrey asked Emmy and me to both grab a foot during the movie that night and just keep massaging through the film. We were always on call for duty, no matter where we were or what ever time it was. He would just plop a foot up or pass over his hand at any given time and require a massage, even if the film went on for over two hours, I would still be required to sit on the floor rubbing his feet or hands, and even his scalp at times. After the credits had rolled Ghislane got up to close the door to the room and I knew she had received the signals herself and would proceed to manipulate, violate, and use us to satisfy Jeffrey's urges once more before he went to bed.

The blue illumination from the empty T.V screen was glaring in the tenebrous room as we watched her undress in a light that relied on the reflection of the moon through the windows peek to show it's proceeding display. She walked back to the sofa where I was sitting at Jeffrey's feet still rubbing away and uncovered her shirt displaying ample bosoms for his appeal. Approaching me like a lioness hunting her prey she stood me up and led me to the other couch across from Jeffrey and situated herself on top of me, sliding her fingers through my dress to unbutton my attire, revealing my girlish figure and two small peaks. Pushing my head into her breasts I was being fondled by Emmy at the same time, which took her cue when she saw Ghislane look in my direction. From an occasional glance upwards, I could see that Jeffrey was up to his methodical foreplay stroking his manhood while watching the build up to his main event. They both took turns making me moan from their touches and when

Ghislane was ready too she would insinuate we do the same to her. She urged me downwards, until my head was between her opened legs and giving into her wanton indulgence. Twenty minutes passed before Jeffrey exerted his last energies for the night, the only advantage of being with an old man was they could never last long.

Departing to our own separate quarters for the night, I called T.J for condolence. It was so important for me to feel like I had someone out there who saw me as more than a pretty girl with vulnerabilities. I needed to maintain some sort of a connection to my youthful side. But it would be to no avail as I was getting used to being badly disappointed by all the men in my life.

Chapter 8

The phone nearly rang out and as I was about to hang up the receiver when he finally picked up. On the other end of the phone I could hardly hear T.J above the background noises. When I asked where he was he told me "At our place baby", meaning the apartment Jeffrey had rented for me to be staying in alone. He already sounded off his chops elongating his words and slurring his speech. There was music pumping and people shouting behind him and every one sounded like they were having a great time. I was so sick of his friends coming over using my house as a place to party and then trashing it so bad I would even have to sometimes throw my furniture out. I blew up at him over the phone and threatened to kick him out, back to his parent's house, so much for my relaxing evening I thought to myself venturing on to tell him "You leech off me using the money I leave behind for you for drugs and throw these gigantic parties while I'm away." Also mentioning the disastrous messes I would come home too. "I am so close to ending it with you", I would openly threaten, but he knew better than I did, that I just couldn't bring myself to do so, needing some attachment to my youth through all of this. "Don't worry baby" he would say attempting to soothe me with his false words going on to tell me how much he was missing me and how he was always thinking about me when I was away which was like all the time.

I would soon be buttered up and soft for serve. This was my penalty for choosing a guy that accepted my lifestyle with my "Other-Man" as I had so eloquently put it to him once as not only acceptable but deemed it "Cool". The conversation ended with an easy good-bye and no "I-Love-You's" or anything sweet. We weren't those kinds of partners yet, so much time spent away from each other and the lifestyles we both led, I couldn't expect much more from him than what we already had.

Jeffrey and I left two days later, heading off to Carmel in California for a business trip of his, leaving Ghislane and Emmy to catch a commercial flight back to N.Y.C, where we would meet up with them later. When we arrived at the hotel we were given badges for the meeting tomorrow and settled into our rooms. We got adjoining rooms, keeping the doors open at all times, but sleeping in different beds. He liked sleeping alone, even after a late night session I would always go back to my own room. I think that's why he liked me so much I never put pressure on him to become intimately more than what we were already, never giving him the impression I wanted more than what we had. It seemed to keep him happy just the way we were together. I hung out with Jeffrey that night, going to a restaurant for dinner and afterwards watching a movie back at the hotel.

The next morning we went for an early morning breakfast before the conference and Jeffrey gave me some money to go shopping instead of attending the all day meeting with him. I was more than obliged to accept his request, and wished him a good day before planning to meet back in the room around six pm. He gave me five hundred dollars. He said it was just enough to go have fun for the day and a girl of my means could find plenty to do with that kind of money. I walked around the many boutiques that lined the streets of the picturesque cozy town, and picked up some bits of clothing here and there and even met a girl who was passing through on a road trip. She was somewhere in her late teens with golden sunshine tresses, olive skin and blue eyes. Her name escapes me, as it was so unexpected, I think it was Tina or something like that but she was your typical California carefree chic, offering me a few tokens of her jay as we ducked down a side street together. I was so happy I had met this girl, as she was fun spirited and charismatic a relief from the social expectations I had come to know lately, but always being "on-call" as I had been trained up to be, I ended up inviting her back to meet Jeffrey at our hotel later on as a surprise for him. Maybe she was just a bit too carefree for Jeffrey's taste but anyhow she was pretty enough to let him be the judge of that matter.

Over the next hour of hanging out together I found out that she was on a road trip with her best friend who was still sleeping off the hard night of partying from the night before. She was originally from the southern states as she had a bit of draw still left in her accent, and she had recently left her boyfriend because he was leaving for a college too far away not believing in long distance relationships. Then it was my turn to dish out my contribution to the conversation of getting to know each other better. I always got anxiety before I would tell a girl what I did for work and romance (as such), morally I was ashamed of who I was especially with a girl having led somewhat of a normal life. Next, as always, I expected to

be probed with so many more questions and having to make Jeffrey sound ideal and hot for the taste of a young girl and knew I would be point blank lying, so I told her some of the truth which was that he was really rich and paid good money for a massage and useful to have around as a contact. I told her he'd give her two hundred dollars for a two-hour massage with me leading the way and warning her he was known to be frisky during the session. Unexpectedly she said she could use the money and then came the part that I hated the most, but had to do so they wouldn't be as shocked as I was the first time I had met him. "He does like us to be nude though and sometimes asks for more than just the massage itself". All I could do was wait for a response after a shocking sentence like that, and depending on the girl, most were sadly taken back by the money. Her carefree attitude seemed to disillusion for a moment when she gave it some thought and asked me "He's not like, fat and ugly, is he?" "No...no...not at all" I replied, "He's got more of a Richard Gere appeal to him". Trying to make him sound a little more measurable than just a rich old man that likes to be with girls younger than half his age. "Well then, what time shall we meet tonight?" She asked next. Great, I thought, Jeffrey would be most pleased with my find. "Knock on my room quietly, you're going to be a surprise. Be there at around half past seven tonight and I will introduce you to Jeffrey". She threw the butt of the second jay we shared in the bushes and we strolled into a homemade fudge boutique to get some relief for the munchies we now had.

When I got back to the hotel at around a quarter to six o'clock pm as requested I'd be, nobody was back yet, so I took the time to set up the oils and bath in my room for his massage tonight. I thought I would plan it so the girl would be cleaning off, as Jeffrey liked before he had sexual contact with a new girl and he could walk in and be surprised to find a strange beautiful girl in my room who wanted to massage him. Jeffrey walked through the door not long after I was done prepping for the night ahead, looking like he had a rough day at the office, which was very rare for him. He sat down on the bed and I asked him how his day was. He didn't want to talk much about it, saying it was boring and long, rather asking what I got up to for the day. Being coy about having a jay and his unexpected surprise to come, I told him it was a great day of shopping and sight seeing and I even brought him back some local made fudge from the shop that had fulfilled my chocolate cravings only hours ago.

Telling him of the places I ventured into I mentioned to him "We'd have to hit the fisherman's wharf tomorrow. I saw some locals walking around with breadbaskets filled with creamy clam chowder and it smelled absolutely scrumptious." He said if the weather were nice we'd check it out tomorrow before we left for L.A. He wanted to take off his jeans and

collared shirt and put on his normal attire of sweatpants and a sweatshirt. Ushering him out the door for dinner when he was more relaxed I was lucky when he said he was starving and quickly got dressed. We just found a quite spot to eat that was next to the wharf and got back to the hotel just in time for our surprise guest. He wanted to go have a shower and settle down for a massage, so I told him I'd join him in a minute. I just had to make a phone call real quick which he thought was odd and asked me if everything was alright, I reinstated that I'd just be a minute, trying not to let on about anything. The knock came quietly on my room's door just on time, as we had planned and I told her my idea to surprise him. I let her into the bathroom where she orchestrated my plan perfectly. Jeffrey finished his shower without me and when he called out for me I told him that I needed him to have a look at something in my room real quick. Not giving in to what it was that he would be looking at, he came into the room where I opened my bathroom door to reveal a beautiful nude girl bathing in a thick amount of soap bubbles in my tub looking at him with an alluring intrigue. His grin went from ear to ear when she stood up and introduced herself letting the bubbles run down her glistening body at an ever-slow pace. It was a proud moment for Jeffrey, I had done well in his eyes, and she was not like the other girls I had brought to him before, degraded from a lifetime of abuse off the streets. This girl was exactly his pro quo looking sweet and innocent as the girl next door. My efforts were to show him I knew that my only responsibility was to keep him happy at all costs. I led her through the massage on Jeffrey and of course afterwards gratifying his perversion with his lustful requests to be fondled and watch us become more than just friends. I didn't feel too bad at the time with his coercion providing many financial rewards making his scheme enticing to a young, impressionable teen not realizing the terrible memories left to come from all of this. Afterwards he paid her the usual two hundred dollars he gave to everyone for their time and took down her name and phone number writing it in his infamous little black book of the contacts he met in every city but only the ones he really liked made it down in his records.

We went out the next afternoon as I had suggested last night and we ate our clam chowder breadbaskets over looking the wharf's bay, watching the seals playfully barking at each other on the rocks nearby. Shortly after we were driven to the private airstrip and took off for Los Angeles. On the plane was an unexpected visitor. Matt Groening the producer of the "The Simpson's" T.V show was catching a ride with us. I was so excited, as I loved watching his show and acted like a star struck fan, asking him everything from his initial idea for creating the show to where he got his characters from. He told me it was all based on his own family make up,

but without the crazy father and son scenes of Homers hand around Bart's throat.

I was enjoying our conversation, when Jeffrey insisted that I give Matt a foot massage throughout the duration of the short flight. I never turned down a client but when I saw the shape of his feet, I nearly threw up at the thought of having to touch them. He had yellow crusty toenails that even someone with a chainsaw would've had troubles cutting through and then there was the fluffy balls of leftover pieces of sock wedged between the crevices of his sweaty toes, now that was the real icing on the cake for me, no way could I attempt this I thought. Then I had an idea. I went to the back of the plane and rinsed a wash cloth in warm soapy water and returned for his dreaded foot massage but not before attempting to clean them first.

In return for my services Matt was kind enough to draw me two quick sketches on blank paper from his briefcase of my two favorite characters, Homer and Bart. I asked if he would make them out to my little brother and dad, the true fans of the family not missing an episode during dinner over the past ten years or so. Next to the A-4 size drawing he was able to fit in the quote "To my greatest fan from Matt Groening" and their names next to it. I knew they'd absolutely love it, and it was such a nice gesture his feet were no longer an issue as I laughed it off and even made a joke to the comedian about getting a pedicure before hitting L.A.'s beaches.

The flight was only short and we arrived in busy L.A within the hour, saying Good-Bye to Matt, who was a pleasure to meet. Jeffrey had a meeting at a production studio for one of the girls he was keeping lured in his grasps, so we were off yet again for more business. We were staying with one of his old girlfriends, Jeffrey's code for "She got to old for my taste, but was still nice enough to keep around". She was a tall blonde with blue eyes, a stereotypical Barbie doll. In her younger years she had been a successful model and now lived on the beaches of Santa Monica with a sweeping view of the oceans landscape as her backyard.

The next morning Jeffrey and I went out to breakfast. He said Sarah Keller, would be joining us with another one of Jeffrey's girls I hadn't met yet, her name was Nadia Bjorlin and she was a Yugoslavian model turned aspiring actress, with the help of Jeffrey, as he so proudly remarked at the table before they arrived shortly thereafter. She was a stunning brunette with olive skin tones and shocking blue eyes. By far one of the most beautiful girls I had ever met before. She and Sarah approached the table, shopping bags in hands already in the early hours of the day. They both pulled out a chair and showed us their new pair of Jimmy Choo's they had bought on their way here this morning, and excitedly asked for Jeffrey's opinion. He loved the dotting attention and anyone who could make him feel important. We all went back to Sarah's

apartment that Jeffrey rented for her on Malibu Beach. This was the first time Jeffrey came to visit and when we got there you could see why. It was a tiny one-bedroom shack, too small for his likes of accommodation, but she loved it and it was plain to see why, the waves lapped underneath her porch twice a day, what else could anyone want. Before even walking through her door, you could hear the commotion of excitedly screaming females voices coming from inside. There were about five other girls in Sarah's living room and she had invited them so Jeffrey could have a few different girls to choose from. Jeffrey looked at Sarah and smiled, aren't you sweet, as all the girls rushed to introduce themselves, hoping for the opportunities Sarah had offered them to come in the first place.

We all had some coffee and biscuits while the conversation kept getting louder and louder, every girl trying to talk over the next one. Jeffrey could handle only so much of that before getting too annoyed. Instead of choosing one of the other new girls, Jeffrey wanted Sarah to show Nadia and I into her bedroom. He was anticipating the introduction of his two favorite girls together, what mischief he had hoped we would get up to was apparent when he asked where Sarah had kept her play toys and not the fisher price ones. Sarah brought out quite a collection of her personal toys and was giggling on her way out as she shut the door. Suddenly the room behind us went quiet, probably hoping to catch a moan or groans too laugh at and I felt so degraded having everyone knowing exactly what was going on. Knowing my duties well I was baffled this time as there was no ritualistic massage wanted. He immediately instructed us to start kissing and fondling each other with the provided toys straight away seeing his excitement grow watching us try and out do the other one with pleasure, he couldn't keep restraint any longer and started to have intercourse with the both of us, taking his erect penis out of the other to only swap to the other girl, back and forth. This continued for a good fifteen minutes or so while we continued to engage in lesbian acts on each other while the other girl was being subdued by Jeffrey's thrust's of penetration. Nadia was just as dutiful as I was in fulfilling his demented requests, willing to lend her body to Jeffrey and those he sent her too, for the sake of keeping her acting career and putting on a good act at that. She was never competition though. Once I found out where she actually came from I took pity on her for the similar life of servitude we were both accustomed to and not that we ever became good friends but we had reason to relate to each other.

Later on Jeffrey, Nadia and I went to a production studio in L.A, where we had to meet with Nadia's agent as well as the producer of "Day's Of Our Lives". The meeting lasted five minutes, with everyone in consent to the proposal. We flew all the way out there to talk about money, only to be leaving that evening back to N.Y.C. On the way to the airport we

stopped at a fifties looking diner and got a cheeseburger and vanilla milkshake, the first and only time I saw Jeffrey eat what I considered to be real food. Seven lanes to drive in and the freeway was still lined bumper to bumper in the heavy rain. The sound of downpour on the rooftop of the taxi and the rhythm of the windshield wipers was making me sleepy. I was looking forward to sleeping through the long flight back. Thank goodness we had a private jet to catch back, the trip would be comfortable and not rushed to get there on time through the daily peak hour traffic. Jeffrey asked me what I thought of Nadia, more of a kiss and tell kind of thing for him, so proud to admit some of his tenacious acts of pedophilia to me that I knew most people would be embarrassed to even think aloud but I said what he wanted to hear when he asked me what I had thought of her on the way back. I replied, "She is attractive, funny, and seems to know what she is doing with you." Laughing at my statement, he then started to tell me the history behind where he got her. Five years ago when she was merely a teenager just turned thirteen. Her father had recently passed away, leaving Nadia's mother in a tremendous amount of debt and living in a third world country, she didn't have the means necessary to raise her own daughter. When Ghislane approached Nadia for the first time at a music school, she seemed like a maternal, caring stepmother. Telling Nadia's mother if she let Nadia go with her, she would see to it personally that Nadia receive the best education and chances in life to make it. In her customs it wasn't odd for a young girl to be married off to bring the family good fortune, so she kissed her baby girl good-bye and sent her off to commence her life of servitude. I sat there speechless listening to Jeffrey brag about his endeavor to get her over here, shocked that he could stoop as low to use a barely teen to oblige his sexual desires. He was laughing and giddy as he replayed the memories of her arrival over in his head, painting me a horrific picture I had no choice but to imitate a smile to face him with.

No pretty girl is safe from the allurements of these villains procuring the youth off of every street in the world. I knew that day more than ever before those morals did not exist for people like this. Jeffrey once told me that every girl he has had sexual relations with has benefited in their career, finances, or an achievement in marriage with a successful colleague of his. Mine was the massage career, ever so often still giving me a lesson from a professional, which kept me quiet for a while longer. I thought I was already knee deep in this world, if I gave up after putting myself through all of this hell it would've all been for nothing. So I treaded lightly, constantly at a risk of being replaced by another willing participant and playing the eager student he wanted me to be.

Chapter 9

We met Ghislane and Emmy in N.Y.C, and it wasn't a blissful reunion as I hoped for, wanting a break from all of this I was just looking forward to getting back to Palm Beach, not leaving for a further four more days. I got home late in the evening as Jeffrey invited me out to the movies after we had relaxed at his house for a while after landing.

I put my keys through the door to my apartment and walked in to a quiet house. Not thinking anyone was at home I set my suitcase on the floor and put my cell phone on charge as I always did to be accessible for whenever Jeffrey or Ghislane could call. I went to get a drink out of the fridge when I heard some noises coming from the back of my apartment where my bedroom was. I started back there and slowly turned my doorknob to reveal T.J on top of another girl. When they noticed they weren't alone anymore, T.J got off her with promptness. I recognized the girl from seeing her around at parties, and she was the town lowie, scattering her trail of guys along with her presumable diseases, and I wasn't shy to verbalize that when she tried to open her mouth and calm the heated situation between T.J and I. She didn't like her cards on the table in front of the guy she was screwing around with and got up in a fit of rage to attack me. Still nude with only my new white sheets to cover her body, I threw her out of my house along with T.J. "I have been paying your way for months, only finding out your sleeping with the biggest slut in Royal Palm Beach, at least have some dignity and higher your standards." I didn't really have a leg to stand on since I had started this relationship giving him the knowledge I had a sugar daddy to answer to above him. "You're gone all the time and with that old man, what did you expect me to do?" He was right, I wanted what I couldn't have, but I needed some time to cool down and accept my situation. I loved having T.J around to come home too, and he used to be my best friend in my school days. I convinced myself of the lies I continued to accept.

Days later I was still not speaking with T.J, mentally adjusting to my circumstances, I thought I'd have the day off to relax since I hadn't been called all day. Until about five pm when Ghislane called and said Jeffrey would like a massage in an hour. Grudgingly I got up from relaxing on the couch, got dressed and put my make-up on, meeting Juan downstairs a half an hour later. Jeffrey was already lying on the massage table when I walked in. I started the massage being very quiet from my somber mood, when Jeffrey picked up on it and said "you know it's not good to massage people when you're angry, you could pass on negative energy". I wasn't sure if he was serious or just trying to be nice so I could speak about what was bothering me. Ending up not being able to contain my

emotion any further I told him what happened with T.J and broke down in tears, a little heart broken from living in such a lie. He turned around from his massage and sincerely paused for a second thinking he was going to console me but instead he laughed at the very prospect of my notion that monogamous relationships ever existed. "Are you serious, he was only doing what every guy in the world does, you can't hold that against him". I replied in a lighthearted gesture "whose side are you on anyways"? His answer stuck with me for many years to come "I'm on your side which is why I'm going to save you a lot of grief with this one tip, Never expect a man to be faithful and you'll never be let down, it's just the way us men are genetically imprinted." The remainder of the massage I had to pretend like I wasn't further saddened by his response, but in fact having to act enlightened. I would never come to him for any other relationship advice, ever again. He told me I'd be fine if I just listened to my mentor. He still loved role-playing the teacher and me the pupil, like the old days before he got rich and only used to be a college professor. I finished the massage and fulfilled my sexual duties before being sent home wanting to collapse in anguish.

T.J was outside my apartment door when I got there, his mom waiting downstairs in her minivan just in case I kicked him out again. He pleaded his guilt and promised that he would never see her again, agreeing with me that she was the town slut and he screwed up big time. I let him back into my apartment and back into my life for that matter but more aware of the world I was being led into believing was of normal conduct accepted by everyone in this sick world. Jeffrey was going back to N.Y.C and told me to have a few days off before his assistant at his office would arrange an E-Ticket on a commercial flight for me to join him later in the week. I had just made loads of money from my previous trip and wanted to relax like any teenager does, so I threw a hotel party that weekend on Singer Island in Rivera Beach, inviting only a small group of friends to begin with.

The hotel room quickly filled up with a flood of teens and the pumping music was blaring. The room had a balcony overlooking the pool and the beach that became the smoker's section. I wasn't a real smoker at that point, preferring to have a puff of a spiffed blunt instead so I made it my rule to go outside trying to prevent holes in the carpet, but it didn't last too long when our forbidden walls came tumbling down. Making so much money that I could supply my wild parties with an assortment of drugs like trips, ecstasy, and coke as well as an abundance of alcohol, that T.J had all the contacts for, made my fellow teens admire me. It definitely gave me a head swell, thinking here I was so young but so grown up already with all of my peers from high school looking up to me. In the wee hours of the morning we were all still going hard with our eyes

dilated into little black diamonds. We were all having in depth conversations about life and where we would all end up when this charade was all said done. Nobody got to sleep that night as the room slowly dwindled in numbers as people were finding their way home to recover from the repercussions of drugs wearing down out of their intoxicated system.

When I flew out to N.Y.C to meet Jeffrey the next day, I was still in a horrible state. Not knowing what was wrong with me, thinking it was just a bad come down, I rushed out of the elevator and down the hall to my room, sweating profusely, to make it just in time to the toilet to throw up bile again for the uncountable time since getting off the plane. I was having intense cramps in my stomach and when I was called down to meet Jeffrey in the massage room, I had to decline for the first time. I told the housekeeper that I was feeling very ill after the flight, maybe some off food for lunch and needed to lie down for a while. Nobody came up to check on me for hours or even called. Waking up from my much-needed nap, I pulled back the expensive white sheets to find myself in a pool of my own sweat and blood. I was covered in the red stains that drenched the pants I was wearing. I had no idea what was going on, I could only focus on the dire amount of pain I was in. In between the heaves of throwing up and crying simultaneously I was able to reach the phone and called the housemaid on the intercom. I told her I needed to go to a hospital immediately and slammed the phone down only to fall back to the floor hurdled in a ball. She didn't hesitate in calling Ghislane who ran up to see what was wrong. Ghislane then called Jeffrey who was in his office at the time and told him to hurry up to my level, stressing to him that it was an emergency. Thinking they really cared about me for the first time since I had known them, they came with me to the hospital with me. Now I realize I was only a liability in getting them caught and they needed to get to the doctors before I could say anything incriminating. They were suspecting the worst now and seeing he never wore a condom with me and from our previous conversations they knew I always made T.J wear one, they feared the situation at hand.

When he saw the catastrophic state I was in at that point, it was the housemaid who helped me get up and assisted me down to the car where Jo-Jo was waiting for me. He drove us to either Lennox Hill Hospital or Mount Sinai, I can't remember, as it was so blurry in such a bad condition. Rushed in for immediate testing I was uncontrollably vomiting and in so much agony, I was given an injection to help me to subside the intense pain. A nurse came in to ask who would pay for this and although I insisted my parents insurance still covered me, Jeffrey persisted that he take care of all the medical bills and gave the nurse his information.

When the pain relief kicked in, everything and everyone dwindled away until I felt like Alice in Wonderland who just swallowed the shrinking tablet and everyone standing around me seemed to move so quick, speak so loud and hover above me. When I awoke from my induced state, I was alone in a different room. Not knowing at all what went on but feeling a little better, I called in the nurse who looked through my charts and checked my vital signs. Then told me the doctor would be in shortly to inform me of the conclusion to my illness.

He was a tall man with dark hair, and a hardened look about him obviously from his job and constantly seeing the worst horror stories man could think of, he just bluntly told me I had miscarried in early stages of pregnancy. I should be fine to go home as soon as my course of intravenous antibiotics was complete. The news sunk in fast and hit a deep nerve. I waited for the doctor to close the curtain before I let out any emotion and cried for my disastrous lifestyle that was dragging me into a world that I wanted to break out of. This reoccurring cycle of believing I needed men like Jeffrey to succeed in my life was draining the last bits of sensitivity left in my heart. I was picked up by Jeffrey himself who took the doctor alone to the side of the busy hallway to have a private conversation about something. Jeffrey wasn't comforting at all, instead he sent me back home to rest for a couple weeks, and I only fell deeper into a depression, using all forms of self-medication to treat my sorrows.

Two weeks later, as if Jeffrey was trying to lighten my spirits, he told me I would be going to his island to meet a new client. He is a Harvard Professor, named Stephen [REDACTED]. I would be spending two days with him showing him around the island, dining with him, and treating him to a massage whenever he wanted. Without Jeffrey even verbalizing the need to have sex with him, he told me to keep him happy like I had my first client. I packed my suitcase with island apparel, and kissed T.J. good-bye, who had at least offered me a warm embrace upon the news of my miscarriage but none other than that knowing it wasn't his.

Stephen was a quirky little man with white hair and a mad scientist look about him. We arrived separately and I greeted him when one of the housekeepers picked him up from the airport and arrived by boat, instead of helicopter as Jeffrey and Ghislane often arrive on. We made our acquaintances and he looked as if he was tripping over himself with words, obviously delighted with his company and location for the weekend. I showed him around as Jeffrey had asked and took him on an adventurous quad bike ride around the small curvy paths, leading the way and letting loose my hair, doing something that gave me a natural high instead of the prescription one. The sights alone were breathtaking from the mountainous peaks of the untouched parts of the island, we sat at a cliff and just sat there, not saying a word to each other besides to

compliment the sights mother nature that appealed to us. I didn't feel as if I owed this stranger anything but what was expected of me by Jeffrey and I could be polite, I just couldn't be myself.

We got back to the main villa to see what time dinner would be served so we could have time to unpack and clean up beforehand. We both met at six pm for dinner on the outside veranda. He sat at the head of the table and I sat next to him, politely folding my napkin to put in my lap. The first time Jeffrey and Ghislane had seen me cut meat and eat with a fork and knife they were so appalled, making fun of my unsophisticated habits. Ghislane took the fork and knife in her hands and proceeded to show me how to politely cut my food and eat. Now that my mannerisms had improved they wouldn't have to be worried about my etiquette when someone important was around anyone. We both drank the red wine supplied on the table and it seemed to warm me up on the breezy night. By the time dinner was served and another red wine bottle later, he seemed to get funnier. I made fun of his tousled hair and he poked at me for my skinny legs, calling me a wanna be-anorexic. When dessert was brought out, he asked if he could receive one of the delightful massages he has been hearing about from Jeffrey. I gulped more red wine down and sweetly complied with his offer, dreading the moment I'd have to see his naked body, let alone touch it. I asked the housekeeper Kathy that had been serving us that night to please have someone set up a massage bed in one of the cabana's. I went to my room to down a few Xanax, telling him I wanted to freshen up after dinner but to meet me in his cabana in twenty minutes or so. I was ready to go as I had said, twenty minutes later, with the effects of the tablets mixed with the red wine, and I would be free not to feel anything. He was still dressed when I got in the cabana, obviously not accustomed to this and a lot shyer than what I had been used to, I told him he'd need to undress and lie face down on the table, putting a towel to cover his bare bottom to prevent him feeling embarrassed during the massage. I gave the massage my earnest as I always had, and quickly got through having intercourse with him. Not wanting to make any foreplay or anything extravagant out of it, I let him think that's as good as it got, and by the smile on his face, I thought I had done enough.

The next day I took him down to the beach for a real massage under a tiki-hut on the waters edge. It was one of Jeffrey's favorite places to have a massage, as he droned out to the sound of the waves and my gentle therapeutic strokes. Afterwards we had lunch back at the main villa and went back down to the beach to swim out to the water trampoline about one hundred meters off the dock. He didn't do any bouncing around or anything like that. It was just a good base point for a rest spot after a long

swim. What was really cool about it though, was you could see through the mesh and watch fish swimming underneath.

The rest of the afternoon we spent by the pool reading magazines and eating fruit plates. Eventually he went to his cabana to have a nap later on. That night after dinner and my mixed cocktail of Xanax and red wine, I asked if he'd like another massage before I went to bed. He just wanted to stay up watching movies in Jeffrey's theatre room. As peculiar as that request was to me I didn't argue it, I just hoped I hadn't disappointed him in any way that could make it back to Jeffrey. I showed him how to use the remote and turn off the T.V when he was finished before going to bed. The next morning we were both catching a flight from St. Thomas and we had no time for anything other than breakfast and packing, which saved me from having to be too polite as we said our good-bye's from the terminal in the airport, both hurriedly off in separate directions, thankfully. I arrived back in Palm Beach, only to be told to catch another flight the next day to N.Y.C, where Jeffrey would fix me up the money he owed me for treating his colleague out to an entertaining weekend.

Chapter 10

I was fixed up more than what I had usually made for two days, which was great because that car I had been saving for was finally within my reach. I had been waiting for the freedom a car gives every teenager for a long time, and now that I had over fifteen thousand dollars saved up I could pretty much afford to go buy myself a nice car outright. Looking much better than the last time I saw him Jeffrey acknowledged it. I went to his office where he was waiting for me and he had a guest with him. She was unusual looking to the common stereotype drop dead gorgeous girls Jeffrey had normally introduced me to. Of Asian decent, her name was Rena. Jeffrey had met her at an art gallery where some of her own artwork was on display. She had a bubbly persona about her and I could then understand why Jeffrey liked her so much, she fit into the subservient category that he liked his girls to fall under. It was apparent to me that they had already slept together in the short time span they had met, as there closeness was oddly noticeable and I wondered what it was he was offering to her in exchange for her body. I found out later from Jeffrey that he was buying her artwork, promising her the world as an artist, telling her he'd have her work in the all the museums in N.Y.C and the best art exhibits. Everyone was promised something, and seemed to be bought off in some way or another to be in his company. It was only a matter of time that the truth would come out.

To my own amazement Rena was to be assisting me in Jeffrey's massage this day, not being a total knockout or anything spectacular, looks wise that is, but for some reason he seemed intrigued enough. As we made our way through his spectacular mansion she was in total awe at every corner. Commenting on the present artwork and décor that we passed in every hall, it no longer seemed so grandeur to me anymore but hearing someone else speak about it in such excitement reminded me of the days when all of this seemed so unforeseen.

When we got to the massage room, or "The Dungeon" as I used to put it for it's medieval looking appearance, we firstly out of custom all had a steam shower, where Jeffrey expected me to walk her through a servants duties, telling her to take his other foot and start rubbing in small circles and stroking the arches of his foot rhythmically. Rena took the instructions well and began to massage him too. When we all went to the shower next and she followed in my exact lead washing his body as well. Jeffrey absolutely loved the fact that two teenage girls were dually pampering him. Jeffrey wanted to move to the massage bed and I had to further begin to show her about the body, upon his accord. She mimicked my every move up his legs and buttocks, keeping up with every stroke until he could not contain his arousal any longer and was already requesting us to start kissing each other, the start of the very reason we had even met in the first place.

He blatantly stopped the massage nowhere near being complete and turned over to announce his increased arousal in a physical abundance of grotesqueness. Moving over to the small couch in the corner of the room he made a space for her to lie me down on the massage table as she had commanded him to do in such a domineering tone that he wasn't used to being spoken down to with. From that very moment onwards and from the look on his face he was yearning for her to orchestrate an hour of deliverance upon my meek nature. He started to stroke his erect manhood as he was being tantalized watching her take over every inch of my body in a dominating act of seduction. I was left breathless and soar after my first introduction into the world of S&M.

Rena considered herself a dominatrix, she loved bondage, whipping hitting, and eventually cutting her sex partner with little sharp knives until they subdued to her punishment in agonizing pain. She was absolutely crazy if you were to ask me, and I couldn't help but wonder what got her into this in the first place. All I knew was that Jeffrey was absurdly taking into the appeal of watching us two interact, often with her acting as my mistress who would fondle me with an insurmountable amount of whips and toys. Then she would love to finish off every session by hitting me across my face with a hard blow from the back of her hand and sneering over my curled up body showing Jeffrey her ability

to make others surrender to her extreme force. She could be so opposite all of the sudden and be tenderly intimate with Jeffrey stroking his penis lovingly and even speaking in baby talk to him, which he seemed to adore.

He loved us pairing up so much that within months he made Rena an official even renting her an apartment at the same place he had one for me during my extensive trips out to N.Y.C. Sending us out shopping together at all of the underground seedy sex stores downtown we would bring him back thousands of dollars worth of sexy outfits, sex toys and bondage material. His favorite one was a black leather studded collar that lead down the back of my spine to cuff my hands and feet together, offering Rena the most compromising positions to wield her afflictions, one she was excited to pick out for my usage.

She was good at eradicating my softer side though. Helping me forge an unpredictable scenario of me turning the tables on her, making her at my will instead of me always being at her twisted discretion. Jeffrey loved the rivalry between us, both striving to dominate the other one but to me it was just another way of surviving her punishment. All for show I thought she was a madman let loose in a torturous domain of violent sex and unbearable beatings. I wasn't sure how long I could hold off this charade of S & M, I just didn't want Jeffrey to think I couldn't give him everything that she could, always being replaceable in his company.

She and I could often come across as good friends to his blind eye but it was only a matter of time before the animosity inside of me was going to snap. Doing normal things too made it all half bearable. Having a lot of similar interests we did fun things like go to the theatre to watch "Phantom of the Opera" or visit several historical and art museums together, afterwards treating ourselves for a giant piece of greasy N.Y.C style pizza. Like I said, we really liked each other purely as friends but the dominance in the massage chambers was taking it's toll on our strange friendship. One average trip back to N.Y.C, she surprised Jeffrey with a six foot by six-foot oil painting of her and I lying nude in a ying and yang position facing each other. Although we were soliciting each other with sexual innuendo the picture was still very carefully orchestrated to perfectly portray the darker side of Jeffrey's thrills. It was an amazing piece of work, besides the lewdness of it, but she would've known that's exactly what kind of art Jeffrey liked. He was so astounded by her gift as he had previously asked her to construct a small painting of us together but was not expecting anything of this grand magnitude she had presented him with. He lifted her from the ground and twirled her around before he thanked her profusely and embellished her with his profound gratitude, the only thing Jeffrey had to offer, he handed her a small wad of cash as her payment. It was the most appreciation I had ever

seen him show a girl. Obviously moved by her gesture, he got her an exhibit in N.Y.C's "Metropolitan Museum of Art" where she submitted her very own piece. She sculpted an image of my headshot out of clay, shaping it with the strands of my long hair blowing across my face. I was taken aback myself at her creation. She really did have an amazing talent if not for her meaner streak she would've been a great friend. I will never forget Rena, for all of the ups and the downs we endured together.

It wasn't too much longer before I finally had enough of the abuse in the bedroom and I had to tell Jeffrey what I was feeling. She was getting even more violent as time went on, and with her questioning me and Jeffrey why she didn't get brought on long trips with him, she didn't get the fact that she was just a tool for him to use. Jeffrey said he was already thinking about getting rid of her off of his "regular list". He said she was becoming too clingy and he didn't like clinginess or jealousy. I never even got to say good-bye or take the opportunity to keep her as a friend, like a girlfriend to catch up with once and awhile, but that's how it was with Jeffrey, one day you sat under the blanket of his comfortably and the next without any warning you could be discarded like yesterdays news. She would've taken it hard but that's the game we were playing and it was for those who knew what lines not to cross.

I was further surprised the next day when Jeffrey gave me a thousand dollars to go shopping in downtown Manhattan to find a classy dress, on top of being sent to the exclusive beauty salon of celebrity stylist "Frederic Fekkai" for a new look. It was amazing, to be pampered like royalty. I walked out of there feeling like I had replaced a young girl with a young woman, I felt beautiful. He had yet another surprise in store for me. Ghislane called me and told me I need to go to a photo-developing store and ask them for two I.D photos then bring them downtown to Jeffrey's Manhattan office. Weird request I thought. I was more used to posing in full body shots being sexually exposed as a gift for Jeffrey. I did as they asked and took my two photos into the office where Jeffrey's assistant was waiting for my arrival. Still not telling me what the headshots were for, she took them from me and told me to have a seat for a second. A moment later I heard Jeffrey call me into the office. "I like what you've done with your hair, you've gone more blonde, suits your glowing tan". I replied with an appreciative "thank-you" for sending me to such a renowned hairstylist, and shopping money. I showed him my finds for the day, an elegant off the shoulder navy blue dress that had two layers that would swoosh and sway with my every stride. I couldn't wait to wear it on a special occasion, and I wouldn't have to. The pictures I had to bring to him, as he would proceed to tell me, were for my first passport. I was so excited, we were going to France for a close friend of Jeffrey and Ghislane's birthday party, famed super-model Naomi

Campbell. I was so over-joyed with excitement, what girl my age with a background like mine was attending socialite parties and globetrotting the world. It only made it harder for me to see beyond the elusive walls I had put up to protect myself from the appalling truth.

We left in early April first going to London, Paris and then our final destination being St. Tropez in Southern France. If Hallmark had a postcard, St. Tropez would definitely be on the front of it. It was beautiful spring weather and every where you looked women were dressed in bikini tops branded with some kind of designer label embedded into it and the men were following them around like harping dogs in heat. In all of the elegance of the Mediterranean, "La Bastide De St. Tropez" was an impressive landmark. Jeffrey and Ghislane were staying in one of the private cottages, on the park on the grounds, while Emmy and I stayed in separate quarters inside the hotel. The old style cobblestone streets were lined with boutique shops and beauty parlors. It was the hedonistic stomping grounds of the beyond rich and famous.

The next day we went out to lunch at the grand opening of the infamous Nikki Beach Club, where a cheap glass of champagne costs around two hundred dollars and if your not keeping the alcohol consumption flowing like water, you'd be asked to leave to make way for the constant flow of prospectus patrons. That's where I first got to meet Naomi Campbell. She was wearing the typical attire strutting around southern France, a D&G bikini top and a wrap around mini skirt to go over the swimsuits bikini. She was so tall and stunningly beautiful. Her charisma was energetic, funny, and everyone seemed to hang off of her every word and laugh at her every joke. Ghislane and Jeffrey kissed her cheeks and wished her a happy birthday, and then I was introduced and followed in their suit. She was surrounded by a league of assistants, friends and fans, which didn't make it easy for us to all converse but she got enough time in to invite us aboard a yacht of a fellow she was "kind of seeing" at the time for the before party ahead of tonight's event. We went back to the hotel and I gave Jeffrey a massage in his room before we all headed down to the pool to soak in some of the year's first sun's rays.

I loved wearing my new ball gown and feeling like a princess. It was absolutely sensational and made me feel as if I floated in the dress. I swept up my long hair in a twisted clip, only letting down a few curly strands and layered on the mascara. Receiving many compliments throughout the evening when we eventually left the Yacht to make our appearance at the main birthday bash, I couldn't help but feel excitement for the party to come it was the first celebrity birthday bash I had ever been to. Being introduced to model after model and the rich men that followed them around became dizzying. Jeffrey sat back and watched as I buoyantly worked the dance floor, coming back to the table where he

was, only to grab another glass of champagne every now and then. Every so often he'd introduce to me to someone new, pulling me aside to show off his eager young masseuse to his fellow pedo's. These people had so much money pouring out of them. I don't know why he even thought they'd care in the first place. It made me feel good though. At least I knew I made him proud to have me in his company.

Being surrounded by so many of Jeffrey's colleagues and his likeminded people that were considered the most sophisticated and the highly esteemed of today's world nearly made the way I was living lately more fathomable, at least to myself. I thought if everyone looks up to these people and they are all accepting of it, it must be just the way the world turns. I danced with a young prince that night and with all of the help from the bubbly champagne I couldn't remember his name for the life of me. On one of my trips back to the table for another glass, Jeffrey leaned over to quietly whisper in my ear that it was a prince that I had actually been dancing with and I didn't phase me in the least way. I went back to the dance floor and continued to let my hair down. It was a fun bash, the entire crowd sang "Happy Birthday" to Naomi and by the time we got back in the car to retreat for the night, I was giddy from the drinking and dancing all evening. We had a guest in the car, and apparently we had already been introduced, but I couldn't even remember his name in the first five minutes of our meeting again. He was the hotel owner of some large chain in America called "Hilton". Staying at one of the cottages near Jeffrey, he saw it quaint to loan me out for a night's massage to ruin an "almost" perfect evening. Jeffrey told me to come back to his room after I was finished with Rick, thankfully he reminded me of his name but also odd I thought, being so late I would've never imagined Jeffrey could stay up this late but I never made a fuss out of his requests. I gave him affirmation of my understood instructions and headed off with this stranger into the darkness.

I dimmed the bright lights in his bedroom to a softer tone as if it might aid the vision of this short, balding man with straggling remnants of curly brown hair left to show for the remaining bits of youth left in him. I had to ask him to undress and lay on top of the towel that I had picked up from the neatly folded pile at the end of his bed and spread it over the duvet. I didn't want to waste a second in his place, getting right to the very reason I was even there. Turning around while he was getting undressed, being our first time together, I wanted to give him the impression I was actually a therapist and not a finale to the end of the nights entertainment. Not exactly what he had in mind though, given that my impression was already made for me when Jeffrey arranged for our meeting in the first place. His chuckle to my response was condescending as he came up behind me and unzipped my dress which floated to the

bottom of the floor as he was saying "You can't really expect to give a massage wearing this, here sweetie, I'll help you out of it." He just wanted to see the hidden bounty my clothes were hindering his eyes from seeing. I just went about my way trying to get his hands off of me and to get him to lie down for a massage. Making quaint conversation with him was pointless as I was trying to send his thoughts elsewhere other than the apparent perverted schemes replaying in his mind from the heavy breathing he was making and the looks he was giving to me. I was using all of the tricks in the "turn-off" book even asking him about his wife and kids.

Unquestionably he was in seventh heaven turning every one of my distractions into another flattering compliment. He was saying things like "I love what you do you to me, I have never felt like this before, come stay with me and I will pay you double, no, triple whatever Jeffrey pays you!" Knowing he was just a drunk idiot, I wasn't being lured in by any of his offers of money or a privileged lifestyle, I knew these cages all too well and I was better off sticking with the one that I was at least accustomed to already. Holding back any composure now, he was going extremely wild ravishing at my body trying to tear off my panties like a hungered wild animal. After all of the champagne I had drunk that night it gave me the nerve that I needed to know exactly how to handle perverts like this one, who had been no different from every other shmuck in my life, and I quickly shut him up with a blowjob lasting no longer than two terrible minutes. It had only been shy of a half an hour before I was already getting quickly get dressed and hurrying out his cottage door.

When I got to Jeffrey's cottage I rushed through the door and told Jeffrey and Ghislane, who were sitting front of the fireplace reading a books, that I never ever wanted to see that guy ever again. When they asked me what was the matter, I told them of every thing that had happened that night even how he offered me to come work for him getting paid triple. I established a lot of trust with Jeffrey that night. He asked me why I didn't accept the offer and I responded with "Who would look after you, if I were gone?" Like a caring grand father would do, he pulled me into his chest for a hug and told me that it meant a lot to him. It was so late and I was so tired but I still had to give Jeffrey his massage that night. He asked me to just rub his feet as he fell asleep, and thankfully he was out like a light in no time. The next morning I took two headache tablets and a ginger ale instead of a coffee. Trying to contain my hangover as best as possible behind a pair of sunnies it was mid afternoon by the time I had felt like myself again. We spent the day Yacht hopping, soaking in the sunny weather while Jeffrey and Ghislane caught up with old acquaintances, Emmy and I were just accessories to look good on the arms of them. The next day we wrapped up the tail end of

our trip and commenced our flight back into the U.S. I was paid a generous amount and set off to go car shopping as soon as I got back to Florida. Through a private seller, I was able to pay out right for my car. I got a Dodge Dakota in cherry red, and immediately had an impressive sound system put in. She was my first pride and joy and taste of freedom. I would love to drive her down to Lakeworth Beach to sit in my car and watch the waves while I listened to my stereo blare music and puffed on a jay. Letting the rest of the world pass by while I sat back and watched them walk past wondering to myself what their story was about.

I turned seventeen that summer and had accumulated a string of exotic destinations that I had travelled in such a short time. I was given more make-up and a pair of diamond earrings from Jeffrey. Ghislane only wished me a happy day, wondering at times if she felt threatened by Jeffrey's and my closeness. We went to the island after we left N.Y.C and I asked If Sarah would be meeting us, mentioning it had been a while since we had last seen her. He said he had some bad news about her. Expecting the worse, thinking she had gotten hurt or something, I was astounded when Jeffrey told me that she had been sent to his island with one of his friends for a couple days and when the housekeepers were cleaning her room and they found a stash of cocaine left out carelessly in the bathroom.

He said he had no choice but to let her go. Addicts with no respect for themselves or his wishes had no leeway in Jeffrey's book. He didn't mind that I dabbled in drugs once in a while as long as I never brought them along with us on any trips, except for my Xanax, which he didn't mind because it was pharmaceutical and most of all wouldn't cause him trouble being a legal narcotic. Sarah took it too far when she crossed international borders with an illegal drug, risking her welfare and almost costing Jeffrey public attention. She lost her apartment and contacts in the acting world, only hearing from acquaintances once in a while that she was sinking deeper and deeper into the black hole of addiction. It was sad to find out, as I always did like her.

At the island, Ghislane had just recently obtained her helicopter pilot's license and wanted to get some practice airtime and flew Jeffrey and I to St. John where we picked up Alexandria Cousteau, the grand daughter to the inventor of the scuba tank and underwater explorer Jack Cousteau. Ghislane was out to set us affright in the air, but it was all talk, she was actually an impressive pilot. Still a daredevil though, she got her kicks out of hearing us fret on the earmuffs intercom's. Jeffrey made it clear that Alexandria was a guest when I was told to adhere to her if she wanted a massage, which I obliged her with several times during our first meeting. It was Jeffrey who instigated that her and I reenact as lovers in lesbian acts of foreplay and penetration. I couldn't imagine a girl with

such high prospects lowering herself to something of Jeffrey's standards, but I later found out through Jeffrey that he had donated money to her continuous exploration into marine life and habitats. She had followed in her family's footsteps, all of them involved in Marine Biology in some way or another. We actually got along really well, she was a real decent girl, and loved talking about her passion, everything underneath the waters surface.

When I wasn't busy giving massages to everyone around, her and I would hang out together. Often we go swimming in the crystal clear pool of ocean that the Caribbean had to offer. Once we swam out so far not paying attention to our location and were carried out to sea by the current. We took turns on the backs of each other, taking breaks against the strong ocean tide. It was almost a possibility that we nearly drowned out there, if it weren't for some guys on a boat out fishing for the day when they caught us in their view. They picked us up and brought us back to the island where we were reprimanded by a worried Jeffrey and Ghislane to first of all let someone know where we are going at all times, and never to lose sight of the shore while out for a swim. After that learning experience I took their heed and proceeded with caution. I had a newfound respect for the ocean and it's mysteries.

Having such a lover of the water as a guest, made Jeffrey want to explore parts of his Caribbean he had never seen before. The next morning we were met by a scuba instructor in St. James and given a few lessons in how to use the gear and more tips like how to descend slowly to the ocean floor as not to cause blood clots as well as visual hand signals to communicate underwater. It was so exhilarating beneath the waters surface. No voices to listen too, only the enchanting sights to take in. We explored the surrounding reef and found a large squid, many of sea urchins, and the magnificent colored coral that housed a many of the rich variety of the local species of fish. It was such a great sight to take in. Holding a permanent mental picture of those adventures to carry in my head for all times.

We all had such a great time that Jeffrey hired the same scuba instructor to come out the next day to scuba dive the safer parts around his island. We got bored quickly with not much to see but seaweed and a fish here and there. It didn't take long before Ghislane decided for us all to explore other numerous locations by boat, Jeffrey needed a bit of convincing at first and the instructor was quick to assure him that he knew his way well around these waters, of course he would say that, he was getting paid a hell of a lot to do this in the first place, why not extend it a few more hours?

The clear water glistened and the tropical array of marine life was on display as we wanted to stop at so many places but you could see as

beautiful as it was it could be as equally dangerous. It took so long as we had to veer away from so many desirable spots. Finally we found a good place that the scuba instructor thought was safe. He buddied us up into pairs and we jumped off the back of the boat into the crystal aqua blue waters beginning our descent slowly into the darker regions of the oceans floor. We were situated on open water with a cavern of reefs to venture in and around down below. It seemed to be quite a choice to scuba in, one that our guide said he wasn't familiar with but to alleviate his bored clientele deemed safe to swim around.

It was Jeffrey and the Guide together, Ghislane and Emmy, and I was paired up with Alexandria. Miles, the houseman, came with us and stayed on the boat just in case something went wrong and lucky he did. We were all too far under the water to hear his alarming screams of distress when shadow's lurking in the murky distance started appearing closer and closer. Ghislane actually looked frightened for once as she gave us the signal to start ascending upwards, reminding us by holding her ears not to go up to quick or as we were previously warned before we could pop a blood vessel in our brain and hemorrhage to death, not a very lovely image but neither was getting torn apart by sharks. Those giant shadows became clearer and soon enough we could recognize their indistinct species as the terrifying and more aggressive breed of sharks, the hammerhead. Grabbing Miles hand I was the last one ahead of the Guide to get on the boat imaging the worst as I waited behind Emmy and Alexandria who were the next to follow after Jeffrey and Ghislane I was in too much shock to scream or cry, I just told myself I had to stay calm to get out of this alive. Unlucky for us we found out later on that we were in their breeding territory and being sent a clear message that we were soon to be on the menu to their feeding frenzy.

We all felt like we had cheated death and I know it wasn't only my heart that was still beating out of my chest when we headed back to Jeffrey's island. Jeffrey was pale as his designer sheets and looked like he had aged another ten years in such a scared state. Ghislane took the heat off herself even barely taking a notice of beforehand and decided to poke fun at all of us frantically scurrying to get out of the water, it was just her nature, as I had never seen her move so quickly either. We got back to the island and all collapsed our fatigued bodies in our own beds for a long nap. Freshened up and much more relaxed we regaled our horrendous story again over dinner, this time in laughter. The following afternoon Ghislane piloted us all in the helicopter to St. John's Airport and we said good-bye to Alexandra where we all parted ways. I met her a few more separate times in Palm Beach at Jeffrey's Mansion, but she wasn't a regular of his, probably not as easy as the troubled girls were to bribe.

Chapter 11

Throughout the remainder of the quickly passing year I was on a constant move with Jeffrey. Attending various dinner parties, mostly with other esteemed billionaires and widely acclaimed scientists. Jeffrey likes to surround himself with the most brilliant and powerful of minds, filling his little black book with some of the most esteemed and even infamous people in today's wealthy society. It was during those intellectual gatherings that my body was also put on the banquet menu but this time for a powerful senator George Mitchell and another prominent Nobel-Prize winning scientist who's name would be mentioned but for all the life of me can no longer remember. They would be only some of the recognizable figures of the high society that became added to my list of clientele, of course being introduced to for a lot more than just a client of massage.

As an amusement to Jeffrey's associates I also knew my place was to entertain but not to every desired content. I was to show them a good time but not the way I would have to use technique and effort for Jeffrey. The very teachings from Jeffrey himself, or my tutor, as he liked to so eloquently put it. Consistently being used and adored for the likeliness of my youthful looks I was becoming very accustomed to my lifestyle with Jeffrey, never really relaxing into it, but just accepting this as being as good as it will ever get for me. I didn't think I should be complaining, wasn't I being offered a life in exchange for servitude? Just letting the signs of my anxiety and depression pass me by while I blanketed them with my pills, suffocating under a blanket of pain is all I was really doing.

I spent Christmas and the New Years holidays with Jeffrey in N.Y.C, who doesn't celebrate the occasion, as he is of Jewish descent. Not that he was a religious man anyways, I never even saw him celebrate Hanukah either. We firstly stayed at his ranch in Santa Fe for a week, then left for a long plane trip to Paris, France where we all suffered jet lag for the next twenty four hours. We all stayed in a grand hotel with a view the Champs' Elyse.

Emmy and I shared a room and with her gifted ability to make new contacts in just a few hours, she brought out a jay to share on the rooftop at nighttime while we were overlooking the lit up Eiffel Tower. We never got really close as buddies but we both knew what we were indebted to and felt each other's sorrows. All four of us went out shopping at Chanel, D&G, Ralph Lauren, and many other little exclusive boutiques the following afternoon. As a gift Jeffrey bought me a white terry clothed goose feathered sofa and had it sent back to my apartment in Florida, and bought some new tapestries to have sent back to Santa Fe for his ranch.

We also visited his up and coming Paris apartment. It was a modern, typical flat being refurbished, and we went to see how it was all looking. Jeffrey liked to fuss about every detail and harass the builder's about their work, changing last minute details at a whim.

Days and many croissants later we left for Spain feeling bloated and sleepy. We only stayed in Spain for the afternoon, going to see another astounding Moroccan castle for Jeffrey to replicate at one of his many mansions. It was only a short plane ride to Tangier, Africa for more castles hopping. We arrived at the historic landmark and the only five star hotel in Tangier called El Minzah in the village of Ville Nouvelle. The city and outskirts were still very hostile at the time, females being warned to not walk the streets alone and not to leave the house after dark or be at risk of being raped or worse.

When we got to the room, it was oozing with every expected bit of extravagance that a luxurious historical palace should offer until I was greeted with a pile of monkey poo in the very middle of my bed. Not a happy camper I called Jeffrey, Ghislane and Emmy into my adjoining room and they all had quite a good laugh at my expense. Within a moments notice of a complaint call to the front desk and we had an attendant cleaning up my bed linen. The cleaner noticed the window was still opened, he warned not to leave it ajar at nighttime just in case another monkey wanted to make himself comfortable in my quarters.

Ghislane joked that maybe I should keep it open I might find a suitable husband before I get any older. Always the instigator of a good joke but unable to take one herself she didn't like when I poked back that it was more in her recent taste of men, since she loved to brag about her rendezvous with her various lovers. Once she came back giddy as a schoolgirl with an explosion of news, with all the build up and excitement in her voice you'd think she was the next crown princess, but she had given George Clooney a blowjob in the bathroom at some random event, she never let that one down.

We all went to explore the towns surrounding Moroccan castles and meet their royalty that lived in them. Jeffrey's personal interior designer's met us at the residences. They walked around hurriedly, scribbling notes into their clipboards and whispering between themselves. The palaces were historically unique and beautiful but I wondered how could they live so grandeur behind these walls when they lived in a city of such poverty stricken squabble. Beggars lined the streets, people could just go missing and no one could care less, and you heard of barbaric murders happening every night. Against the advice of the Palace Attendant and Jeffrey's wishes, I decided to take a stroll one afternoon, mainly just to take photos of exotic Africa and do some shopping in the village markets but I ended up being intrigued by a group of young children playing in the streets.

When I was noticed watching them, about fifteen of them came up to me and began to beg for money and food. I was over taken by the poor, hungry children and I felt sad for them all and wished I could help out somehow. When the tide of kids washed away and the street went empty, I was overcome with intrigue at these two little boys. Brothers I found out later on, and there only toy was an empty can they were kicking to each other in the middle of the street. Intelligent kids, they were able to speak three different languages, including English and I was interested to ask them about life here. They didn't seem to notice or be bothered by their poverty stricken lives. They told me about their school and parents and I thought I had just heard the saddest story ever but they were accustomed to living like that like I had been so accustomed to my degrading lifestyle for so long.

I was compelled to empty out the contents of my purse, giving them over two thousand dollars in U.S currency. A passer-byer snapped a photo of the kids and me for myself to take home as a personal souvenir before they rushed home to proudly show there parents the money. I told Jeffrey later on of my good deed and he couldn't believe I'd give away my money so carelessly. He told me I had set up their parents with enough money to feed and shelter their family for a year. Wasn't that a good thing? I couldn't believe it, not that I was well off or anything close too it, but to realize how lucky I was and to not have compassion for the lesser off, especially children of a third- world country, I wouldn't be human anymore. Then again what did I expect from someone who could numerously steal another man's daughter for the use of his own sexual pleasure with great ease.

We went out to lunch the following day with Jeffrey's team of designers to wrap things up and after Jeffrey's afternoon massage he went to the palace to have a nap. When I was all alone I thought I'd go see the culture of the local unique markets again and this time buy some trinkets to bring home. I got to sightseeing and took pictures of the legs of lamb hung over the blood drenched doorway over people's homes as to warn off evil spirits and the ghettos where the local villager's called home. I walked into many of the market's stalls and saw the most peculiar antiques, such as weaponry with the blood of it's last victim stained on it's sharp blades and body pieces of various animal's for the use of religious sacrifices. I was more interested in the different culture and respecting their ancient way of life with interest, instead of squirming like a tourist and getting grossed out. I thought it was so educational and enthralling in fact, I ended up buying a few sacrificial trinkets to have sent to my apartment in Palm Beach. Not to say that I wasn't looking forward to getting back to the luxuries of western civilization it was a bit like camping, fun and adventurous but as equally dangerous and thrilling.

When we left for the final destination of our trip I was looking forward to eating normal food again, not one to stray for foreign dishes, I'm a more of a cheeseburger and pizza kind of girl, a true sign of my American heritage.

We landed at the Heathrow Int'l Airport and greeted by a driver that would take us to Ghislane's town house in London's central that Jeffrey had recently bought and refurbished as a gift for her. Emmy said "Good-Bye" at the airport, leaving us to go to her hometown in the rural countryside nearby to visit family for a six-week holiday from work. It wasn't a very long drive before we were in the heart of the city and at Ghislane's place. I thought it was a cheery townhouse that had character and the historical pub in front of it and cobblestone streets only added a unique charm to its presence. They were going out for dinner and invited me along with them but seeing I was so exhausted from all the travelling and looking a bit melancholy, I apologetically declined going out for dinner that evening, I rather would be taking a few pills to catch up on some needed sleep. "Are you sure your Okay?" Ghislane asked as she showed me to my room, more considerate than she normally was but I assured her that I was in absolute good health, just tired from all of the recent jet lag. Without another word said she whisked off downstairs, to the car where Jeffrey was waiting for her.

I took the liberty to call my parents house to say "Hello" and catch up with them since I hadn't been home at all for the holiday season this year, always too busy working. They sounded really happy to hear from me and my mom put me on the phone to talk to my brothers as well. I got to tell them about my travels abroad and I had some cool tribal stuff from Africa that I bought for them. They sounded so proud of me, all of them, and why shouldn't they be? In everyone's convinced mind I was making great money, travelling the world, and meeting new faces everywhere I went, why should I spoil anyone's delusions, especially mine. I took my sleeping tablets and had a bath before falling into a deep and much needed sleep.

The next morning I was woken up by Ghislane who I could tell was in a chirpy mood by the way she paraded through my closed door saying "Wake-up sleepy head" and opened the window's shutters to let in the bright sunlight, she had never done anything like this before and I knew immediately something big was happening. She sat down on my bed as I rolled over from my deep slumber and I was able to mutter for an explanation as to why she was awake so early. "Besides the fact it is ten o'clock in the morning and nearly time for brunch, we have a big day planned out for you today." She was waiting for my cue to ask her "What are we doing", when I did, she responded with a convincing enthusiasm "We're going shopping for a new ensemble" she paused for a moment to

build the suspense, before completing her sentence “To go dancing with a Prince of England this evening”. Hoping it would be one of the younger generations, I was disappointed when she told me he was the Duke of York, Charles’s younger brother Andrew. I looked at her with a fake surprised look, one I had to use on many occasions in my time with them, to give an impression of excitement. “What... wow!” I exclaimed with my gifted acting ability. It is a sad realization but I had grown more accustomed to seeing people for their significance rather than the good qualities they possessed, and was able to grin & bear the thought of what I expected lay in store for me.

Ghislane and I left shortly thereafter for the many lanes of designer shops to choose from in London. Her pep talks to prepare me for my duties towards royalty went on and on, giving me the obscure impression I was something of importance, at least for more than an evening. “Make sure your bubbly and energetic, nobody want’s a dead horse” was one of the cheap tools she instilled me with. “Who knows where this could lead for you” was another. As the day grew shorter my anxiety only heightened, anticipating the Prince’s arrival and unable to decide on an outfit, I picked out three. Our last stop for the day was Burberry’s for a nice handbag to compliment our chosen attire. We got back to her townhouse with still a couple hours spare to get ready. After trying on all three outfits and many mental debates with myself later, I decided on the pink mini-tee and dazzling pair of denims with horses embroidered into a pattern. It seemed a lot more my style and age group rather than the other two older looking sophisticated dresses I had picked out. I told myself I was going dancing at a club not to an opera. As most young girls can be during their body changes into womanhood, I felt awkward, you know, big feet, freckles and body hair in unwanted places. They’re things you just don’t want when your seventeen and then you see these iconic billboards of what femininity is supposed to represent and just don’t fit into that picture, never feeling what we all are already... absolutely perfect. By the time I had got ready I was a nervous wreck, but trying to keep my cool on the outside was an act. I thought it’d be a good idea to take a few Xanax before the evening unraveled and my anxiety went through the roof.

Jeffrey and I were sitting in the lounge room downstairs, waiting for Ghislane to finish getting ready. The room was silent, only stillness in the air. I stared at the mural painted onto the wall that I was facing. It was an interesting piece of artwork. In great detail it illustrated a happy looking family sitting on a bench overlooking a pond that resided on a large piece of land with a beautiful home displayed. There were also hunting hounds and the hunters chasing a game of fox like the notorious “English Hunt Pieces” throughout history. Jeffrey took notice of my enchantment into

the picture and in a hushed voice proceeded to tell me that it was a portrait of Ghislane’s childhood, the part she could be proud of. I never realized how prominent her family’s history was in England, apparently as to Jeffrey’s attest, her Father was born of poor Jewish decent in Czechoslovakia, most of his family being killed upon Nazi invasion in 1939. Fleeing to join the British Army as a young man, he changed his name a few times and made a lot of contacts in the field. After the war, a newfound Robert Maxwell went into publishing using his army contacts to establish a business initially built upon publishing scientific books from occupied Germany. In time, Maxwell acquired several British newspapers, among them the Daily Mirror, countering his wits against the likes of Rupert Murdoch along the way. However, whilst constructing his publishing empire, Maxwell compiled astronomical debts, and his equivocal financial dealings attracted the attention of governing authorities that judged him not to be looking out for his companies best interest and in the end it transpired that Robert Maxwell had been using proceeds from his employees pension funds to meet his financial debts, ruining the futures of thousands of employees. Once an esteemed Member of Parliament and publishing mogul, Robert’s body was found floating in the Atlantic Ocean after he was found to be missing from his yacht, the Lady Ghislane (named after his favorite child), whilst cruising the Canary Islands in 1991. Jeffrey went on to tell me that when her Father died she was inconsolable, and in a very bad state. He picked her up from the trenches of despair and took her under his wing, and it’s there she has stayed comfortable ever since. To Ghislane his peculiar need to have so many woman around and even his taste in younger than legal one’s didn’t seem unconventional to her. It was her own Father who was deemed a womanizer and even took a second wife whilst still married to Ghislane’s mother. I would have never guessed this carefree, spirited, and vivacious woman had ever endured such sorrows. I couldn’t help but look at her in a different light from then on, but not letting her know that I knew, to avoid any altercations between us.

Like clockwork Ghislane came downstairs five minutes before Prince Andrew were to arrive, wearing a tight-fitted white wooly turtleneck singlet and a nice pair of loose fitting trousers. Looking elegant and casual at the same time, a very hard look to achieve but one Ghislane had always easily mastered. They both seemed at ease poking fun at my obvious nervous state, just another ordinary night out for this extraordinary couple. The knock came at the door just after six o’clock in the evening. Ghislane greeted him and the guard who would wait for his return in the car. She led him down the hall to where Jeffrey and I were sitting. We both stood up and Jeffrey shook his hand, while Ghislane proceeded to introduce me and as I was taught by her was English

custom, we both kissed on the cheek. We all sat down on the lounges for some tea and biscuits while conversing idle chitchat. By the sounds of it, Ghislane knew well of his recently divorced x-wife Fergie, whom they were all taking turns in slandering her for one reason or another. It was apparent there were some fresh wounds still lingering on and as good friends do, it was their way of helping him get over her. When his daughters were mentioned, Ghislane and Jeffrey treaded lightly, only speaking highly of them, and offering their sympathy to the young ones.

The conversation turned to a much lighter subject. Andrew wanted to know more about this young guest they had to join them out for dinner and dancing that evening and then the spotlight turned on me. I was more nervous than I had ever been before a night out with someone, probably the build-up Ghislane and Jeffrey had hyped this meeting up to be. To break the ice, she played her favorite guessing game..."how old do you think Jenna is"? When Andrew guessed correctly, I was seventeen years old, she was surprised, thinking I could have passed for younger. "I guess we are going to have to trade you in soon" she laughed, always the first one to throw in her quick-witted two bits, all of them chuckling along with her. Hardly a laugh at all, unknown to me at the time his eldest daughter is only five years my junior. I was finding it hard to make much conversation in the beginning, just laughing when the occasion called for it, and keeping up with Andrew's constant glances in my direction, was all I could manage.

The restaurant was a close drive for us with Andrew, his two guards and his driver following behind us. I was seated next to the Prince for dinner and Ghislane and Jeffrey next to each other, an evening pre-ordained. I was supposed to flatter him with compliments and dote on his every word spoken, but I didn't even do that for Jeffrey blatantly, it would've felt awkward to act like a bimbo for him. Instead I remained calm, cool, and collected, hoping that my nervousness wouldn't spill out at any given moment. The next place we were going was much more my style, and I found it easier to relax. We pulled up next to a Nightclub called "Tramp", a member's only nightclub, and one of the most exclusive haunts in the world for the rich and famous to be seen for the last forty or so years since it's doors first opened. Andrew's guards waited outside while we all went in to hit the dance floor. Jeffrey being the social introvert that he was found the first available empty seat in the corner but facing the dance floor to spend the evening watching everyone else have fun and Andrew went to the bar to grab us all drinks. He came back with sparkling water for Jeffrey and a cocktail for the rest of us, already knowing that Jeffrey never drank alcohol. We downed our glasses and made our way to the crowded dance floor, where I had the Prince's upmost attention. Moving his hands across the curves of my body, not to shy away from the fact

that he was in public, he was whispering sweet nothings into my ear and kissing my neck. I would just giggle not really knowing how to reply to an aging man with a bad smile and terrible moves, it would sound too much of a lie if I retaliated back about his swagger. He was the most incredibly hideous dancer I had ever seen and couldn't help but laughing on the dance floor and shooting glances of embarrassment to Jeffrey and Ghislane who were having a good time laughing at my expense...as the always did.

After an hour of pelvic smashing to the D.J.'s pumping mixes we finally exited the floor, his royal highness was dripping with sweat and ready to embark onto a quieter scene where he said we could be alone, not knowing that it had already been arranged for all of us to meet back at Ghislane's place but complied with his so called thoughtful request. I was so anxious about getting back to the townhouse, knowing what expectations I would have to not only have meet but also exceed in this case. Ghislane and Jeffrey seemed impressed at my attempts to entertain his royal highness, so far giving him exactly what he wanted the impression that I idolized him. They told me that he really liked me and was having a great time, so far tonight. When we got to the townhouse, his guards walked him to the door, staying to wait outside in the car. Ghislane met him and brought him upstairs where Jeffrey and I were in the study. We all chatted in the hall for a few minutes and I was able to have Jeffrey snap a photo of us together, one that would cause much controversy for the Buckingham Palace in many years to come. The conversation didn't linger on much longer before Jeffrey and Ghislane dispersed downstairs together, leaving me to my own sort of royal duties. They walked away giddy as if they were teenagers imposing on young lovers about to embark on a romantic evening.

Next to the study was the bathroom where I led him to next. The room was dimly lit masking the light from showing the disparity in my eyes. It was a beige marble tiled floor with porcelain Victorian style bathtub in the middle of the room and nowhere near the size of Jeffrey's residences. I turned on the taps for the tub and the heat from the water began to steam up the small room. On the basin were aromatic oils, lotions and soaps, loving the scent of floral notes, I poured in the lavender bath oil. Trying to do the best of my youthfulness to try and act seductive, I gradually began to strip off my clothing, piece by piece. Giving him time to savor the moment to come. He loved every second of it as I went over to where he was waiting and watching, then began to undress him at a much quicker pace. We kissed and touched each other before submersing into the hot water, where we both continued to reenact foreplay. He was adorning my young body, particularly my feet, caressing my toes and licking my arches. That was definitely a first for me and I couldn't help

but laugh, I hoped he didn't expect the same treatment back. Through my recent experiences with Rena, I drew a line with extreme fetishes, especially ones that would involve my tongue and feet in the same sentence. It wasn't hard to get him wound up to the point where he just wanted to have the rest of me so we dried off from the cold and retired to my bedchambers for the longest ten minutes of my life. Moments later and without any real emotional attachment, he burst in ecstasy, leaving me to my own feelings of dismay. As relieved as I was to see the experience come to pass with him, it was finally sinking in that I would never be anything more than but a muse. Still trying to ascertain a surreal dream a young girl once held but no longer the same girl I was no longer sure that the dream was even real anymore. In the whirlwind thrown together by wealth, power, and privilege I was but a grain of sand and felt helpless down the road I was naively being led down. When the real picture was unveiled, later in my life, I had nothing but memories filled with sorrow to remember of my teenage years.

Jeffrey, Ghislane, and I left for the states to conclude our long journey home to the U.S.A. I was so happy when we landed on our soil and called T.J from my cell phone to see if he'd meet me at the airport instead of going back to Jeffrey's, he'd be there within twenty minutes, he was so happy to hear my voice and that I was back in town. So ecstatic to be getting away from my life of servitude for the next few days, I was sourly disappointed when I got off the phone. As if he'd been listening to my entire conversation, Jeffrey told me he'd like a massage back at his place and he could pay me at the same time for my trip with him. With much dismay I had to call T.J back and cancel the arrangements, I wouldn't see him until later that night, in which one of Jeffrey's staff would drive me home and I would be too exhausted to do anything.

Chapter 12

When we got back to Jeffrey's mansion in Palm Beach he wanted to thank me for showing his friend, the Prince, such a good time. Rewarding my diligence with an extra sum of money and luring me deeper into his goal of keeping me at his side as his personal amusement that he could lend out anytime. Further proving his capability of using the vulnerable impressions of a young girl to influence and intimidate his fellow peers of

like minds. Jeffrey didn't want to know the grim details of how it all happened on my intimate night with the Prince, he just asked simply if I thought that I did well in keeping his friend happy. Knowing already that the evaluation of my performance I gave was already discussed between them, I just as simply replied back with a nod of approval. Though I did have a laugh with Jeffrey about the Prince's weird fixation on my feet and lets just say that he was quite tickled with Andrew's quirky obsession, having a good ol' chuckle at my eccentric encounter. I was paid extremely well this time, putting my money earned into nothing but popping pills and alcohol by shouting my so called friends a good time, aiming for the attempt to forget about my experiences abroad. I partied like that to feel young again, my age and most of all to self-anesthetize my troubles from within. It wasn't like I was waiting for someone to arrive on his white horse and take me away to a magical world. I simply yearned for more out of life than being someone's replaceable amusement. Still a romantic at heart I would often get lost in my daydreams, imagining a new beginning with a strong man that would show me an enduring love, safety in his arms, and a lifetime friendship. Though the suggestion of true loves existence was only a dream for now, something I could only read about in novelistic fairytales but the passing thought from time to time was warmly envisioned. With my inner most desires being locked away in a deep crevice of my heart, I knew my romantic notions would be absurd in Jeffrey's eyes. For some unknown reason to me he couldn't allow himself to give love or receive someone's heart in return. Once he said to me when I asked him if he ever thought he would settle down and find Mrs. Right and he told me he didn't believe that love with one monogamous partner was possible but he found that love with many was. I thought at the time it had something to do with having so much money and everyone wanting him for that instead of seeing him as a person and even felt bad for him, but now I can understand from his recent lessons unlearned that it was a simple equation of his twisted perversion to become infatuated with the vulnerable youth off the streets. Spending so much time in the entrapment of Jeffrey's embrace, I was becoming numb to the feelings and aspiration to ever climb above this deep hole I had dug myself into. I knew I wanted to escape from this bizarre form of first class slavery but I still didn't have the tools necessary to help me get out. How could I have? Everyone that knew me believed I was living this enchanting life, a rags to riches success story that most people dream of, only I knew the price to be paid for all of this and I was the only one who could pay for it. Underestimating my true self, I was settled by Jeffrey's side for now considering him to be someone to look up to, my mentor. Such a

complicated battle within myself, it is one I still ache to fully comprehend today.

Sunny spring days melted away the ice off the frozen streets of New York and the harsh winter winds begun to gently blow away the dead leaves, making the caged trees appear to have some form of life again. I hated the cold winters there, it would only add to my depression being locked indoors. Give me hot Florida days blistering in the sun where I can swelter by a cool pool and sip cocktails with pieces of fruit and little oriental umbrella's floating around. What a vision of solace? Looking around my extravagantly decorated mid-evil room I was reminded of the desolation that I was more than accustomed too. Knowing it wouldn't be long before I was summoned again for another ritualistic occurrence in fornicating with my master, I hardly bothered to leave my assigned chambers, scarcely being sent home for a moments break, I just accepted my fate. As I predicted the intercom buzzed momentarily and I heard Ghislane's voice come over and request to meet them in Jeffrey's study. Not an odd call, I would often meet him there first so he could tie up some unfinished business before heading to the dungeon, or what was thought to be the massage room. Making my way down the hall, I had an eerie feeling wash over me, as if I had several pairs of eyes on me, watching my every move. A cold chill moved up my spine and I had to move my thoughts elsewhere, too easy behind these walls to succumb to my fearsome anxieties. I punched in number one once inside the elevator and it took me down to the floor where Jeffrey and his surprise guest were waiting with anticipation behind closed doors. I cracked open the heavy wooden doors and a familiar face revealed itself. Definitely not expected or pre-warned on my part but I already knew what he was here for or at least why I was called down to the study. Prince Andrew had that notorious cheesy grin slapped over his face, as he looked me up and down like a shiny new car on display and he was about to take it for a test drive. Ghislane led me to the decadent sofa he was lounging on and twirled me around to give him a good lookover before sitting me down on his lap. Like a show pony I knew exactly how they wanted me to be paraded around, with the last of my dignity long lost, I had nothing more to lose. It was easy to give them the reaction they desired, all I had too do was pretend to be entertained by their lewd gestures, and when Andrew cupped my breast with a doll made in his image, I only giggled away. Ghislane wanted to take a picture of the bizarre scene and even got Johanna, another one of Jeffrey's so-called personal assistants, to come sit on his other knee for the snapshot, giving the impression girls couldn't stay away from Randy Andy.

Many crude jokes later and I was asked to show Andrew to the upstairs massage room. I'm sure he already knew where it was from previous

encounters with Jeffrey's "staff" but I led the way anyways, as if he was now my guest of honor. Entering into the dim room it took a few minutes for my eyes to adjust to the darkness, but knowing my way around the room was enough to find the shower. I turned on the steam room and began to undress myself. Andrew followed my lead and disrobed, throwing his attire to the floor. I wanted to run and hide feeling his hands touch me again, but my servitude for Jeffrey kept me there. Getting out of his stronghold I turned my attention to the steam filling up and tried to turn his attention to the marble bench where I suggested he take a seat while I rubbed his feet. By the look in his eyes I knew he could care less about a foot massage, his real desires were being shown by the arousal his body was forming. He indicated where he wanted me to touch him and how. I fulfilled his seedy requests, but only just. There was no pleasure in this for me, the only thing I derived from this event was to sink further into my slumber of depression. I couldn't remember a time when I felt needed for anything other than my body or amusements thereof. After his massage was thoroughly conducted I couldn't wait to get back to my room for another shower. Sitting on the floor of the shower under the harsh spray of water, I scrubbed my body where he touched me. Feeling abhorrent and ashamed what I had become, I let the water wash away the grime.

As the days progressed into nights and the nights followed a trail of destructive months, my outlook on life had diminished into utter sadness. I had lost my spark and my ability to look like I could handle the abusive state of affairs I had drifted into. Sinking deeper in the euphoric state of being on coke and pills, not only was my mentality dwindling away but also my looks. I sure as hell didn't feel like a seventeen year old anymore and now I wasn't looking like one. My eyes had dark circles underneath them from not sleeping and my bones protruded from my skinny waistline and chest. This made Jeffrey apprehensive in keeping me around as often and before I had a moments notice, I was out of money and looking for a job. When I questioned him what was happening, he told me I wasn't the same girl he had first met some time ago now and looked like I needed a break from working so much. "I'll call you next time I'm in town" was the last thing he said to me.

Chapter 13

Going back to an average teenagers life was more of a harder transition than I would've ever thought. Jeffrey stopped paying my expensive rent and I was forced to get off the drugs and look for a real job to feed and shelter T.J and I. It was much harder than it sounded, but I was craving

this in every possible way. Even though a week's wages for working a full-time job as a waitress didn't come close to the money I had made in a couple hours of working for Jeffrey, I was happier than I had been in a long time. I made some friends at my new job and found my duties to be easy and pleasant. I was good at making customers smile and keeping them happy becoming the waitress that made the most tips for the night, which in turn made my co-workers happy since we'd all split the tips at the end of the week. For the first time in a long time I had boys my age hitting onto me, and not that I was ever taken aback by there attempts but it reminded me of how it felt to be around a younger crowd. I missed so much of what I couldn't get back and the more I tasted it, the more I remembered how to smile. The relationship between T.J and I began to falter in a way that was beyond reconciliation. Fights became physical and I saw sides to him that only pushed me away more. He refused to look for work to help pay bills and he became utterly frustrated not having his usual cocktail of assorted drugs to keep him from feeling anything at all. He didn't like the fact I was growing inside and thinking beyond his elusive world. I had gone through too much to accept another form of abuse and degradation. Making that point very clear to him by kicking him out of my apartment back to live with his parents, I felt liberated like never before. I kept up with my rent and cleaned my act up. Enrolling in a yoga course and keeping my focus on staying fit and healthy became my only source of enjoyment. I was free and living for myself.

While out doing the grocery shopping one evening I couldn't help but stop at the local pet store and fell in love with a furry pooch. She was a Japanese Chow-Chow and a bundle of fur that more resembled a baby brown bear than a dog. I took her home with me and instantly she became my best friend. We went for several walks a day and she bore the brunt of many tear filled conversations, she was my loyal companion who understood more than anyone had before, all I really need was someone to listen and funny enough it was her that filled that hole.

Nearly three months had gone by and not a word from Jeffrey or Ghislane. With T.J out of the picture now too all I had to concentrate on was work, my parents and brothers, and of course my dog, Mary-Jane. I was going to family night dinners and bon fires again. My older brother was getting married to an amazing woman in a few weeks and I got to be apart of their beautiful ceremony. Small details of life's journey that I already missed so much of and now being able to smile at the simple things day in day out really seemed to put the real value of life into perspective for me. Everything seemed to be working out for itself and I was really happy, until he came back, T.J thought he'd come over my place one evening while I was sitting at home just watching TV.

Obviously mentally distorted from whatever choice of drugs he was smoking that night. He screamed down my apartment complex, going mad and scaring my neighbors I felt like I had no choice but to let him inside. I tried talking to him as a good friend would, just wanting him to see what he was doing to himself and what he had become. Part of me still loved him and took pity on watching him spiral downwards. Taking him back into my life was not a decision I made whole-heartedly, but was something I did out of guilt and what I thought was loyalty. He moved his clothes back to my place, which was all he ever owned anyways and we tried to pick up the broken pieces. T.J being still badly addicted to many drugs, I had to be very careful where I kept my jewelry and expensive items. I decided to rent out a space at a local spot and store my cherished items away, just taking the necessary precautions, I thought.

Still not working I knew how he was scraping by money and I didn't agree with it, T.J was a known thief and had been caught several times attempting to steal things, even as stupid as DVD's and PS2 or Xbox games from a local Blockbuster. He even stole from his parents, his sister and his brother and would probably steal a piece of candy from a five year old kid if he knew that it would get him his next fix. He hated the change in myself, realizing I couldn't be brought back down by his ways but knowing I still stuck by his side and defended him from anything that would hurt him wanting to believe that he still wanted show the bits of human nature left in his empty heart.

Unable to stand by and see me do well for myself he contemplated a way to try and bring me down. After a busy shift one night, he retaliated with another show of control. I had just finished cleaning up my area and setting out the tables to be ready for the next day when I went to the bar to hang up my apron and put my nights tips in the tip bowl on the counter by the beer tap. On one of his drug induced rampages he stormed into the restaurant where I was working and started to pick a fight with me. I knew he was off his face when he started accusing me of sleeping with my manager on shift that evening. Having no bias or ground to stand on in his attempt to make me look bad in front of everyone, I just laughed him off as a drunk idiot who needed to go home and sleep off the night's repercussions, although I was fuming inside that he embarrassed me but I still made excuses for him and told my boss I had to leave early to bring him home.

The bar was deserted as T.J waited alone for me slumped in a barstool and looking worse for wear. I had to go to the back of the restaurant and do some explaining to the manager on duty, I couldn't afford to lose my job over this incident. Surprisingly he was sympathetic towards my dilemma and even told me I could do a lot better than that schmuck, patting my back and telling me to have a couple days off. I punched out

and headed to my car with T.J. in tow. For the rest of the night he was oddly quiet and asked to be dropped off at his parent's house, I was more than obliged to do so. I couldn't stand the sight of him let alone want to be around him tonight. Being so revved up it didn't yet dawn on me that something wasn't right. The next morning I was woken up by an alerting phone call, I had the manager from the restaurant where I worked, on the other end screaming at me and asking where the money is. I sat up in bed, completely awake now, and asked him back, "What are you talking about, what money?" His tone had calmed a bit and he could hear the earnestly in my voice and explained his accusations "The tip jar was empty after you had left last night and there was over a hundred and fifty dollars in there, now it's missing". The answer hit me instantly and I got a terrible knot in my stomach...T.J. When I left him at the bar not even thinking about the tip bowl to talk with the manager, he saw an opportunity to fund more drugs and he took it. That's why he didn't even want to come back to my apartment last night. It was all too clear for me now and I tried to explain to my manager about my boyfriend's sickness and asked him to take the lost money out of my wages. "I have no choice but to let you go and file a police report for the missing money". I couldn't believe what I was hearing. How did things turn upside down so quickly? I exclaimed "Even though I'm paying you from my pocket for money I didn't even steal and you've never even had any problems from me before?". His apologies were short and icy, nothing that could be done. I slammed down the receiver only to pick it up again to dial T.J.'s parents house and to no surprise he hadn't slept there last night and was not able to be reached. I felt like I was in a bad dream I couldn't wake up from and with no money to pay rent, eat, or even survive, I was back to the drawing board.

The week passed without hearing from T.J., he was in hiding, for now. When the phone rang early one morning I expected it to be him, instead it was a surprise phone call from a familiar voice. Jeffrey decided to give me a call to invite me over to his Palm Beach mansion for some lunch and to catch up, it really was just his way of finding out if I was cleaned up and ready to come back to work for him. With my life in chaos once again and having to borrow money off my parents for grocery food, I saw a quick solution to my situation and was even convinced this is what I had to do to take care of myself.

He greeted me at the door and led me inside. Ghislane was at her usual spot, her desk working away, and we headed past her with a quick wave and lip-synced a "Hello", not wanting to disturb her important sounding phone call. She glanced up quickly and gave a brisk wave my way, then put her attention back to the computer. Once we were inside the poolside cabana, which was Jeffrey's office, & gym, Jeffrey took a seat behind his

desk and told me to have a seat across from him. He took a sip of water from an already poured glass and asked if I'd like some. "Yes, Thank you" My reply was short and polite, already just wanting to get this meeting done and over with. His face was like steel and his expressions were stern, I felt like a child in trouble sitting in the principles office.

He cut straight to the chase wanting to know "Are you on drugs anymore?" There was a moment's pause as I took a deep breath and told him the entire truth. "I got really depressed for awhile and coped with my emotions by blanketing them with mind-altering substances. Just smoking a jay to relax wasn't good enough anymore. I needed to be high and flying to believe I was happy and dealing with all of life's curveballs. Snorting things like coke and popping amphetamines replaced my sorrows with an overflow of endorphins, making it possible to keep up with everything, until I would come down and the cycle just kept on repeating itself".

He listened to me continue to tell him about the good things that have come from the break. Like my dog, yoga, and working at a restaurant, making lots of new friends but most of all, I got my smile back, without the drugs this time. He was really happy to hear the upside of everything, but there was one thing I was reluctant to tell him about. My recent travail that T.J. effortlessly caused at the restaurant where I was so happily employed. As my manager had warned he had to file a police report stating that after I had left, the tips were gone, putting the blame solely on me.

Giving Jeffrey a clear picture of the entire ordeal he exclaimed "What are you doing with this idiot Jenna, he is no good for you! I know you can do better for yourself, why do you let him drag you down every time?" Nodding my head in concurrence I went on to finish my epic drama. "I received a phone call from the PBCP asking me to come in about the money, I told them what happened over the phone but they still want me to come in. I don't want to have a record for something I never did or ever would do!" I put my face into my hands and covered the tears now trickling down my cheeks. "I just can't believe this is happening to me when everything has been going so uphill, now I'm out of work and in trouble" I wiped my face and looked up at him "What do I do?" Enabling him as my mentor once again, his sly grin said it all. Jeffrey normally hated when girls made waves in any way and this one would be considered a tsunami but this time it worked to his favor. He wanted me to come back to work for him, continuing my massage studies and I needed his help. In his eyes he was doing me a solid, which in return I would have to scratch more than his back for. Taking his time to contemplate what to respond back and what solution he could offer, I began to worry that maybe I shouldn't have done this.

Pulling a few tissues out of the box, he passed them across the desk to me. Trying to retract any damage done I said to him "I must look like such a mess to you and making you listen to my saga, I am so sorry... I shouldn't have come to you with all of this." He looked surprised and sympathetic "Quite the opposite actually. I'm glad you've come to me for help. I have got a lot of connections especially with the Palm Beach County Police Department. I give them regular hundred thousand dollar donations, and after I speak with them there will be nothing more to worry about. To be honest I'm more in shock about how much can happen to you in such a short time, your life is one big soap opera"

Now he was chuckling and trying to make light of my somber mood. Laughing along too I replied, "I know right? Drama just hangs around me like a bad smell". We did some more light-hearted catching up and went out to the poolside for some lunch and a swim, concluding the evening with an erotic massage upstairs. He paid me the usual two hundred dollars and asked me to come back tomorrow. "In the meantime I don't want you thinking about your sticky situation, consider it dealt with". His attempt to brighten my spirits had worked relieved about money and the police but now I owed myself to him feeling indebted to him more now than ever.

Chapter 14

As was promised I never heard back from the Police Department and Jeffrey had his favorite girl back by his side. We picked up where we left off ever better than before, I being entirely subservient to every sexual desire of his engaging myself in any role he wanted me to play. As he was getting older his appetite for sex never hazed, if anything it only increased. The orgies with other girls got larger in numbers and his appeal to younger girls, new toys and wilder nights expanded from once and awhile to quite an often occurrence in Jeffrey's company. I put it down his new friend and business investment, Jean-Luc Brunel.

A long time agent for young and upcoming models, Brunel, a French citizen, was known for roaming the world in search of young, naïve beauties living in poverty stricken countries and willing to do just about anything for money. He would procure them mostly from Clubs in South America and the Former Soviet Republic. Filling their heads with fairytales of America and large amounts of money, he would promise them all of the finer things in life, sometimes even throwing a pill in their drink, if that meant getting them in his bed was becoming too much of a task. What he wanted is what he got, which is why him and Jeffrey

ultimately became close pals and he invested one million dollars into Brunel's company. In return Jeffrey now had supply of girls on tap for him to choose from.

With the assistance of each other, Brunel obtaining the illegitimate visas for underage-overseas girls and Jeffrey housing them at his brother's apartment complex on 301 E 66th St, Manhattan, they were quite the team. Jeffrey and Brunel would charge them for rent, forcing them to work for them selling their bodies for money, nude pictures, and even pornography. These were what seemed like really nice people with not so nice intentions setting an impression of how the dignified wealth play and behind closed doors they had as much civilized manners as a barbaric chimpanzee in heat. Giving a girl a step-up in finances by teaching them there only worth is what lay between their legs, us girls all were the same in the end, regardless of what country we came from, what language we spoke or our cultural indifferences, we all were being used for one thing alone, our youthful looks and beautiful bodies.

Being Jeffrey's permanent sidekick, I would have to part-take in a many of the hedonistic exploitations that went on at one of his many residences, which meant having to be uninhibited with many girls my age and younger. Being complete strangers was hard enough but we couldn't even understand each other, speaking in different tongues we were expected to excel at preforming many acts of lovemaking and foreplay on each other, while being observed by a man in a corner jerking off. Not exactly what I would call an advantage in my stage of life, but in my head I was convinced we all had to do what we had to do to get on with life and if that meant doing all of this to keep Jeffrey happy, then I would do that.

It didn't take long in the accompaniment of Brunel for Jeffrey to hit an all time low, at least one that I knew about. Stupid enough or sick enough, I don't know which one it is or both but Jeffrey bragged about his birthday present from Brunel, once accepting three, twelve year old girls, sisters at that. He replayed the descriptive events with me telling me how they all massaged him and finished him off orally. He was so excited about the entire event, replaying over and over again over the next course of weeks how cute they were and how you could tell they were really young by the small amount of hair growth in their pubic region and non-existent breasts. A twelve year old, are you serious? I thought to myself. I still can't shake the feeling of disgust when I recall the look on his face as he told me time and time again of how his lust brought him to that profound low. He went on to tell me how Brunel bought them in Paris, France, from their parents. Offering them the usual sums of money, visas, and modeling career prospects was a bribe of the worst kind, they were just children. Laughing the whole way through, Jeffrey thought it was

absolutely brilliant how easily money seduced all walks of life...nothing or no one that couldn't be bought in his eyes. Behind the two of them followed a destructive trail of those in their path that were misused, violated, degraded in a variety of ways for one purpose... to satisfy the desires of the perversion that rotted their hearts.

The next couple of months I spent in Jeffrey's company, my life was revolved around him and his petty happiness. Arising to the occasion, I was no longer his teenage sidekick, I was growing into being a young woman and my body was blossoming like never before. Out of the awkward stages of my life, I now took to looking after myself like never before. Regular sessions in tanning beds and keeping fit became my life outside of Jeffrey. He kept telling me what a beautiful woman I was developing into and would offer suggestions to help me look good. Sending me to dentists for regular teeth whitening consultations or helping me choose my attire for the evening, he was ushering me into a whole new position, training me up for something else, but I was unsure of what that was.

Being a snotty little teenager was a girl of the past. Now I had to be his eloquent speaking, desirable to all and almost his personal porcelain doll. I went everywhere with him again, all of his eclectic dinner parties, conferences, and meetings with various members of parliament, famous celebrities, and other esteemed billionaires...most of whom lived by the same rule of thumb as Jeffrey did. Quite an alarming realization having to accept this world the way it is. Jeffrey knew all of the right people in this game, and trading girls for favors is how he kept in the circle. He was at the center of it all, blackmail being the only thing next to money with the ability to pull a many of strings, his conniving ulterior motive was to drag all that he could down to his pitiful state of mind. Inviting easily tempted acquaintances to his island or his other various residences he would bring out the assortment of young girls and pass them around like they were cocktails on a platter. No girl had a choice in whom they went with, only completing a task, we would have to charm and bedazzle these ageing fat men who other than paying for it would've never had a shot at getting to know a beautiful girl intimately. I personally belonging to Jeffrey rarely had to be loaned out and it was a big occasion, or should I say favor, if I was. I'll never really know what made me so important or special to Jeffrey, it definitely had nothing to do with love. I guess in the end I will always put it down to my capability of being whomever he wanted when he wanted, so compliant it just made it easy for him to have a personal toy at his constant disposal. All I can say is I lived in a jail with no bars, and in a country where slavery was supposedly abolished a long time ago but still existed right underneath everybody's noses. Myself and so many other girls were walking proof of it.

I still was given proper training in massage therapy from time to time, keeping me from looking back at being a teenager with no responsibilities to being a young adult with prospering titles. He knew I wanted to be self-sufficient so bad I would do anything for it and by giving me this dream to hold to only kept me in check. I looked forward to my training sessions, holding onto every word passed down to me and after the session was complete I would hurry back to my room and transfer the information into a workbook with associating exercises.

Trying my new moves on Jeffrey always impressed him, he would get excited hearing about my passion for knowledge and would tell me he could see it transfer into my massages, always giving it my all, my hands were a focused energy when I was at work. Using every ounce of strength to apply on a body, many were astounded in what I could do for being such a small girl, and Jeffrey loved it, using me for a two-hour massage "with benefits" sometimes being over twice a day. Ghislane would sometimes use me to massage her still but it wasn't as common, she preferred a man for that job.

Then would come the odd client here and there, of course set up by Jeffrey. Most of which were orchestrated to get beautiful girls comfortable and consequently naked then he would go in for the kill, so to speak, touching them intimately, in their most private of places like their vagina, breasts or anal. When he had us where he wanted, willing and able, then would come the toys, outfits and so on. A scheme he has used time and time again, telling those who know him well "he had never been turned down yet". It was starting to dawn on me how I wasn't getting any clientele that weren't used for Jeffrey's benefit and would make me wonder if I just wasn't good enough for that, but I kept quiet, never wanting to make waves like I had before.

To give me a break from it all as if Jeffrey didn't want to overload me again, he would send me away to his ranch for a few days, what he knew I considered being a small slice of heaven on earth. I'd spend my days roaming the hills, riding horses, and enjoying the solitude of my own company. One afternoon I was out exploring the land on Jeffrey's ranch which covered hundred's of acres with nothing but a bottle of water, my sketchbook and a small case of oil paint. I was on the search for something interesting to paint. A great pastime of mine, it made my soul quiet by creating beauty with my brush. I loved to recreate the images I saw on paper. I would paint anything beautiful that caught my eyes interest, from underwater scenes, animals to people and even fruit, I loved vibrant colors and emotion on display but my favorite soon became the landscape of the Santa Fe's rolling hills and earthly green and beige tones and in certain light it would illuminate into a golden shine. To grasp that feeling I was absolved in at the hardest of times became my greatest inner-

achievement, like taking a piece of that serenity and putting on paper for me to keep in my heart where it still is today, closing my eyes I am able to see it, being there anytime I need to. I was enjoying the heat and taking in the deserts sights when I stumbled off the track and into the wilderness. Exploring everything new to me was my second nature and never even entered my mind what would've happened if I went too far or got lost. I would rather face Mother Nature's wrath than humankind's any day!

After about an hour of drifting off track I came to a pile of rubble, looking like the remnants of an old pueblo made out of clay and rock. I picked up what looked like half of a clay bowl and noted that it had Indian designs etched into the side of it. Excited about my findings I decided to do some more exploring around the fields surrounding the historic site. I collected rare pieces of arrowheads, utensils, and parts of many broken bowls with artwork telling tales of their own. Time was of no essence here and before I even realized the sun had sunk deeper into the hills leaving me without any light to find my way back to the pathway. Feeling silly now after passing by a familiar looking boulder twice over, I was startled when I heard some poor animal become dinner for another, it's screams of agony only amplified louder and echoed in my ear drums, heightening the hairs on the back of my neck and making my heart beat nearly out of my chest.

I was lost and confused before but now I was petrified with fear. Taking me over three hours to find my way back to the path and in the direction of Jeffrey's mansion was a mission, so relieved in the end and so were the housemaids after I hadn't showed up for dinner, assuming I must've been out for one of my usual adventures. I went to bed strenuously exhausted that night and as I was falling asleep the phone rang, it was a call from Jeffrey who had been alerted of my disappearance. "What happened tonight, one of the maids called me to tell me you hadn't come back from your walk this evening" Detecting a tone of anger in his voice I tried to distract him by telling him of my findings and he scolded me for being gone for so long without anyone knowing where I was. Going back to the Indian remnants, I persisted on telling him what I had found. In the end he was just worried about me becoming a liability, but had to make it sound as if he cared. "Don't worry Jeffrey, I won't be doing that again. I can honestly say I have learned my lesson and the next time I want to explore I promise to take someone with me". I satisfied his worry of me being a future nuisance and with that I was finally able to tell him what I had discovered on my walk. He was impressed but did not sound surprised. "You must've been gone a long time if you found the old Indian pueblo's, just be careful you don't say anything about where you found the stuff on my property, it

could become a sight for historical preservation and that means the government could ultimately own my land."

I acknowledged his request and told them they were just a gift for my Mom, who was in love with Indians "Wait until she see's I brought her back real artifacts, she is going to totally freak out." He didn't mind that I was taking them. In fact he admired my curiosity and adventurous spirit. He reminded me that tomorrow was my last day. I would be driven to the Albuquerque International Airport the day after next, to meet Jeffrey in New York, for how long, only he knew. Giving Jeffrey many thanks for a great week, letting him know how much I appreciated these small breaks away, we then said goodnight. Hanging up the phone I had caught my second wind and set out to the kitchen to find a late-night snack. Raiding the fridge and pantry, I found some frozen pizzas and popcorn. I put on a movie and munched on the popcorn while the pizza cooked. Some 1980's dreadful alien flick got the better of me that night. It was based on a true story about people abductions from extraterrestrial beings, which were, like I was, visiting a remote area. I suddenly hated being alone on a ranch in the middle of nowhere. I munched down my burnt, crunchy pizza and became further enveloped in the thick plot. Leaving on the TV and the lights on that night, I spent my night tossing and turning, peeking through the small open crevices of the comforter, half expecting to see an alien being in my bedroom.

Living through the night was a relief and I laughed at myself in the morning, how spooked did I get? When I got to New York, Jeffrey, and Ghislane had a good laugh over my tale of survival in the wilderness and then the alien scare. "Your always having the best adventures" Ghislane exclaimed. We were similar in that way, both being a bit of free spirits it was really only her non-existence of moral standards that differentiated the two of us, in that way. "How do you know you weren't abducted and probed? I mean look at you and all that time alone on the ranch, what do you think Jeffrey, could she pass off as an alien?" Expectedly, Ghislane poked fun at me, her usual fun past time. Our relationship was an odd one, never threatened by each other but always precautious towards one another nonetheless able to crack a joke together, but when it came time to "work" it was no fun and games, she was intensely serious. "With a sense of humor like yours I would tend to think that you are the one from another planet." Just friendly banter between the two of us, then Jeffrey had to jump in with his two bits, "I think you might be onto something Ghislane." I squinted my eyes and gave them both an exaggerated death stare and pretended to grab my stomach in pain, "I think some things trying to get out of me", putting my fist in my shirt to reenact a scene from Alien, I fell onto the couch and faked my death. "I knew it" Ghislane shouted and jumped on me to begin tickling me all over and we

all broke out into laughter. It was those fun times that made me feel like we were all apart of this really perplexed family. We did everything together similar to normal families like eat dinner, watch TV, and travel it was only the hedonistic and corrupt side to these two deviates that made them a peculiar pair.

Getting turned on at the two of us playing together, Jeffrey came over to the couch we were on and pulled down his sweatpants revealing his erect manhood. All of the laughter stopped, now it was time for work. Pushing my head into his pubic region I had to give into his perverted wants. Ghislane started to undress me. Once I was bare she loved starting with my breasts. She cupped them in her hands and brushed her fingers over my hardened nipples heading downwards pressing her lips deeply into my skin, I had to maneuver my body on the couch in a complex position to give them both what they wanted. And just like that, without even a moment's notice I could be put on the spot and have to amuse them in any way they wanted. A shameful way to make someone feel like a used toy, I wasn't around for companionship I was there for one thing, I was a compliant piece of eye candy.

Twenty minutes later and Jeffrey had erupted in pleasure. Ghislane sat up, still fully dressed, and wiped the sides of her mouth with her hands, giving a vindictive little chuckle, "That was fun." Jeffrey concurred with a sly grin arching his back for a stretch just looking able to utter the request "Why don't you come up with me upstairs for a steam bath and massage, I need to be loosened up after that?" It was more of a statement than a request, as if I had the choice to say "No thanks, I'm actually tired myself and would love to just relax" instead I would reply with my accustomed trained obedience, "No problem, when your ready lead the way." I had to get dressed again being that we were in Ghislane's downstairs office. Putting my clothes back on, Ghislane thought she had buttered him up just where she wanted him to ask for him to come have a look at her new townhouse renovations when he was finished with his massage. A very strange relationship those two have, there's a definite love flowing between them but not a passionate one, more like a respectful business, he gets what he wants...an uncountable number of girls and she gets what she wants, simple and sweet...an uncountable amount of money. The two things in life that can create such beautiful moments or the most horrendously terrible of them all, is sex and money.

Chapter 15

I joined him for a shower, steam bath and concluded his needs with a massage while listening to classical music. I knew he didn't want anything sexual from me now seeing he got what he already wanted downstairs, no this one was purely therapeutic. My favorite massages to give, making me feel like an actual real therapist. I lathered him in aromatic oils and let my hands discover the ways to unlock the stresses that his body held. After the massage was concluded we were going downstairs to get ready to go see Ghislane's townhouse as he had promised her earlier. He loved taking the hidden staircase while I hated it. I was so creeped out by his choice of décor, the blood red carpets, violent medieval paintings, and sculptures of the pagan god Pan, all of it representing the darker side of hedonism his lifestyle provoked. Spiraling down the hallway along with each step you took came with a pair of eyes that followed your every step. Brown, blue, green, hazel, all of the colors were there, staring at you the entire way down. As each step progressed, so would my anxiety to get out of there.

We found Ghislane where we had left her, in her office. She had just received an order in, a satellite camera with a twelve-inch flat screen. She told us how it was used to pick up any person in any location with the quick insert of an address. Quite a powerful new toy I thought, but it was only a minute display of what the rich could afford, what use they would get out of it was another concern. Soon after she was done figuring out the controls on the camera, we made a rare and first for me pit stop, the security room. What I thought was our way out by the front door was another hidden door. I was in shock as I was led into a room, so discreet that in three years I never even knew it existed. I kept my head down most of the time, knowing how secretive this must be being another door was an entire security base within his mansion. What I could see when I stole a glimpse here and there was an array of tiny screens, twenty odd or something. Small screens showing various rooms of the mansion I had recognized. The images were constantly changing so I found it hard to pinpoint an exact location but from the décor and short glimpses I suddenly knew from then on that my feelings of my every move being watched inside his corridors was now more than a possibility but was actually happening. Jeffrey spoke to an obese Spanish guy at the desk, whose job was to disgustingly overlook all of the video feedback. Kill two birds with one stone Jeffrey thought, free porn to share with all of his pedophile friends and when the occasion called for it, a security system all at one expense. Ever consumed with making money as well as saving it, I was again astonished at Jeffrey's capabilities. I didn't want to even think how deep the video infiltrated, pretending like I never saw anything at all I put the memory to the back of my mind and went on about my day. Stopping at Ghislane's new townhouse, another gift bought and paid

for by Jeffrey, he pointed out needed changes all over the place, driving the builders mad, as always. He wanted the place to scream out "GHISLANE" with a bold statement. Checkered floors and bold colors was the theme, like the queen of hearts from Alice in Wonderland, very well suited I thought.

The dust from the walls being torn down choked my throat and the elevator was not in use, the stairs were hardly either. The whole house was in bad shape then having to go up three flights of rickety steps was a bit of a risk too but worth it once you made it to her future walk in wardrobe or to us commoners, a closet the size of a small a house. Complete with a dressing room, luxurious bathroom and plenty of storage for her every ensemble. Even without it being finished it was already a work of art, a sanctuary for any woman. She adorned herself in her future home, finally her own, relishing every inch of it, she already put in a work desk and spoke constantly of its ongoing renovations. About an hour later we were off to pick out curtains and look at some paint samples at a couple different boutique looking shops. Easily passing off as an ordinary couple for the day, they walked arm in arm strolling the streets of the Upper East Side. Except to me, still replaying the early afternoon's events, shaking my head over the echoed images in my mind, I followed behind just waiting to be needed again.

Over the course of the next few months was a constant influx of exorbitant excursions at Jeffrey's mansions, mainly to his island, to keep up with his ever-demanding sexual appetite with various young women and teenage girls. I got back on the Xanax, an old habit that I felt at the time would stop my memories from flowing back, rehabilitate my problems and relax me enough to deal with any situation at hand, no matter what the circumstance revealed itself to be. It was a drug that would blind my eyes to everything I should've been running from.

Having Brunel always in the picture these days wasn't helping me at all either. Sending his girls for Jeffrey at all of his places now and at a vigorous flow, they had an abundance of girls at their disposal. If I were to count one girl for everyday of the week, it would be the underestimated statement of the century. So many girls between the two of them, some nights it would be a free for all frenzy for Jeffrey and Brunel, seven or so girls giving them their upmost attention, doting on their every moan and whimper, Jeffrey being the main concern since Brunel worked for him and we were all aware of that too. If there were heaven on earth for men like Jeffrey, than he would be their God. Every one of his inner most desires was fulfilled when his harem of women was around. No wonder he didn't travel much abroad these days, all he ever wanted was right at his doorstep. I couldn't believe that he was still asking me to bring girls to him as well. There was never enough girls to

fill his appetite, so on occasion I would meet a pretty girl around my age and invite her back to his place to make some quick money by offering her a really good contact in the modeling and acting business. Keeping him satisfied and in need of me was a tiring job. With so much competition I had to be on the ball, seeming ambitious to grant him all of his desires. It was a lot of pressure and a spotlight of a role to undertake at such a young age but I told myself this is what my life's training had led me up to be.

My Birthday was around the corner and turning eighteen had lost all of its sparkle and pizzazz. There were no more surprises in store for me, nothing that would bedazzle me I hadn't done already. I spent my birthday on the island, having a quiet dinner and watching "Sex and the City" on the couch with Jeffrey, Ghislane and Emmy. There was no cake or a celebration of any sort but I did get a couple of presents that I opened outside underneath the main cabana. Jeffrey gave me a beautiful pair of sapphire and diamond encrusted earrings and Ghislane bought me another designer makeup case. I thanked the two of them with a tight squeeze and a gratuitous short spiel. As it went quiet, I looked out to the ocean and wondered if across these waters was there ever going to be happier days spent with someone special to me. Would he be kind, compassionate, and always be there when I needed him most? Or would I end up settling for my final bit of training, a marriage to a greedy old scrooge? Either way what I wanted most didn't matter right now, I was still bound by Jeffrey's hold over me and all I had to keep telling myself to get through this epic journey was, this is just the way it was for now.

Around the table for breakfast Jeffrey announced that he was expecting a few guests coming over with Brunel, no one of importance, just his usual entourage of beautiful girls. Russian models this time and Jeffrey was also having a photographer flown in to take modeling photos using the island as the perfect background for a sexy shoot. All of us girls were ushered onto rocks, hammocks, dug into sand and displayed just about anywhere they wanted. We were being photographed in next to nothing, like a netted fabric placed over us if the shot called for it, but the more provocative the more Jeffrey and Brunel loved it.

After the photo shoot we did some outdoor watersports. While us girls raced the jet skis around and jumped on the water trampoline, the men stayed on dry land to watch us from the beach. I was so used to this constant charade of girls and I didn't mind having a bit of fun but this was different, I had to be more than just polite because I already knew it wouldn't be long before we were all intimate with each other as well. Being the only girl that spoke English out of all of them was also a huge blunder. The only way we could communicate was through hand gestures

and body language, a very primitive form of speaking, but what choice did we have?

I did my best to get acquainted and as I had previously assumed after lunch on the beach we were again ushered into another part of the island, Jeffrey's cabana. There was no need for words here, as the girls already knew exactly what to do. Without saying anything they undressed me and began to ravage my body with their hands, tongues, lips and fingers. I was delirious, never having done anything like this before with so many girls. It was sheer chaos; I don't honestly know how men could fantasize over this. Through the glimpses in between bodies crossing over me I could see Jeffrey and Brunel watching us, sitting in a chair with their hands around their penises, stroking themselves together "The best part is they don't even speak English so there's never a need to have to keep them amused" I could hear one of the men divulge and pretty sure it came from Jeffrey laughing out loud to Brunel. I just closed my eyes and went somewhere else in my mind until it was all over. That was that, life went on and we all moved on to eat dinner together.

It couldn't be more awkward as Jeffrey and Brunel were beside themselves with their ego's beaming, and the girls chatted like busy little chipmunks with each other. Ghislane and Emmy on the other end of the table were being amused at the entire racket around the table and then there was me. Sitting quietly and smiling in people's direction when needed, I was counting down the minutes until I could go lay down in my giant comfortable bed, slipping away to the gentle noises the island created and sink comfortably into a deep sleep with the assistance of my Xanax. Scratching at the plate in front of me with my fork out of boredom, I wasn't even hungry. I had lost my appetite for food. Rather sipping on the champagne I wanted to feel as far away from here as possible. What seemed like hours for everyone to finish their meals we were finally all saying goodnight and goodbye to each other, as Brunel was off early in the morning and taking the eight beauties with him. "Thank God" I told myself, once was more than I could handle of that in one day.

It didn't take me long to get back into my own comfort zone. Heading straight back to my cabana after dessert was served nearly tripping over my own two feet as I tried to scuttle off in a hurry. As soon as I entered my domain, I drew a breath and sighed a deep exhale outwards, finally alone and at peace... for now at least. Although the sun had set hours ago the high temperatures of the Caribbean were still an affliction, plaguing my cabana I was welcomed by a rush of warm air as I opened the door. I hit the switch to the fan and stripped down for a shower. Preparing my towel and toiletries I opened the back door to the outside shower and placed them on the floor. Whether I was cleaning up in the midst of a hot

day or retiring for the evening, an outside shower was always splendid. Under a thick dark cloak of the night sky only the moon and stars to shed enough light for me to see my way around. I could feel the soft breeze lick the droplets falling off of my bodies' curves in the reflection of the moonlight. It only encouraged me to stay longer under the warmth from the spray of rushing water. I let the hot water run out before I was sufficed enough to go back inside. Lounging around the bed in my panties and a tank top I was still sweltering from the heat. Trying to tire myself out, I did some reading and eventually fell asleep. I needed those times to unwind after such an ordeal, letting the Xanax wash away all of the pain I could then forgive the mistakes I had made, blaming myself for staying around for this I had wished I was never born at all. The pills would take all of that away for me. My heart was a tangled weave of deception and pain, only reassured by the lies that were told to me and the lies I would have to convince myself of.

Chapter 16

When we flew back into Palm Beach, Juan drove me back to my apartment. Lonely for some companionship I decided to call an old friend. I was longing to be important to someone and unfortunately with such little time to have a social life of my own I was compelled to call T.J. again. His Mom answered the phone and sounded quite surprised to hear my voice on the other end. She was always kind to me, I even used to bring her back "Cola" cans from other countries a bizarre hobby she loved collecting. She just didn't know what I saw in her son, even saying that to his face many times over. Not blind to his ways of cheating and stealing, being a personal victim of it, she made it apparent that she did not approve of T.J.'s choice in lifestyle. It used to really hurt him how his parents thought so badly of him, so he gave up trying to earn their love a long time ago. As long as he didn't steal from them anymore he was allowed to live there. Instead of that being a lesson to him, he would just try to be more clever in what he would steal, less obvious things. He would steal the toaster and sell it for five dollars if he knew it would help to get him his next high.

Nonetheless and at my expense I had a sweet spot for him. With enough water under the bridge, I was able to forget about the troubles he caused. His Mom told me she'd pass on the message when he got home, but that could be days from now. The last time he had been home was over a couple of weeks now. He only stopped by to get something to eat, have a long sleep and to beg her for a few bucks, supposedly to help him buy food. Then he was off again without a single word said, only leaving

his parents to their own assumptions, which were pretty much correct anyways.

I then called around a couple of mutual friends to see if anyone had heard from him. Everyone I spoke to pointed their fingers in the same direction and the worst place possible, Ritchie's house. One of his best friends told me of how bad he was doing, "He's not the same guy anymore, and all he cares about is the next high he gets. If we don't get anything for him he just loses it and goes off somewhere." It was hard to hear how badly affected my best friend was and a part of me secretly hoped they weren't right. Still defending him, I told everyone I had spoke too while trying to find him that T.J would be fine, he's just probably going through a bad phase, like we all do sometimes and needs people to have his back more than ever now. I was pretty much laughed at on the spot, most people that I considered my friends at the time were only friends by association. As long as we all looked the part, acted the part, and could handle the part, only then did they want to be around us. The last person I called was the last person I had hoped he wasn't with and it turned out that everyone was right.

He was with one of the biggest Coke dealers in our area, Ritchie-Rich, as everyone used to call him. He didn't look like a typical strung out junkie or dealer. Instead he looked like your average preppy college grad with aspiring propositions. He dressed well and acted like a nice guy to imminent clients only to get them hooked on his drugs and then turns them out onto the streets. He was a businessman and his business was thriving. He carried everything from most drugs to guns and knives. Having ears in all places made him a dangerous acquaintance. Using kids off the local Palm Beach streets to run his dirty errands and the errands of the others above him, he made his money by using these teenagers, who as hard as it was to believe was once somebodies sweet child.

I knew T.J didn't have the finances to support himself or his drug habit so the likelihood of him being indebted to Ritchie in other ways was a safe assumption. Obtaining Ritchie's number from one of T.J's friends Marcus he asked me, "What do you want to call Ritchie for? Come over to my place and I can get you whatever you want" Marcus was a sleaze bag who would tirelessly continue to try to appeal to my lesser sense of judgment, never getting the hint or just not caring that I could never and would never be interested in him. "No Thanks Marcus, can I just get the number please, it's very important that I get ahold of T.J, I'm really worried about him." I hated having to call this guy let alone have to ask him for something. "Is this about the Adam bullshit? Cause if it is you can let him know what a fucking bitch he is for not showing up to be there for him, you can tell him from me that it's his fault and it should've been him that's lying in the morgue now, not Adam" I was totally thrown

by his allegations I could only mutter out a whisper "Did you just say that Adam is dead, what happened?" "Oh snaps, I thought you knew, where have you been girl, under a rock or something?" Marcus was less than sensitive about his statements. "He got shot in the head by two black guys who got suspicious when their usual supplier didn't show up, your boy T.J was so fucked up he didn't even remember to turn up at Ritchie's for the delivery, so Ritchie sent Adam alone and now he's dead." Adam was a sweet kid who just happened to be born living on the wrong block. Best friends with T.J since childhood, the two were inseparable until puberty hit and even then they would chase girls together. Adam followed in T.J's every footstep, mimicking his shadow, if T.J jumped off the Eiffel Tower then so would Adam so when T.J got hooked on drugs consequently Adam did too, leading ultimately to his death. Wanting to end the conversation with Marcus quickly I scribbled down the phone number on a blank piece of paper in front of me and hung up the phone to call Ritchie's place immediately.

"Yeah?" It was Ritchie whom bluntly answered the phone after the first ring. "Hi -Uh- Rich, It's Jenna, T.J's ex, we met a couple of times at a few parties" I was trying to remind him of who I was knowing how paranoid he was about people having his number. "Oh yeah, I know who you are, what is it you want?" He answered with a dry tone. "I was hoping you could tell me where I could find T.J, I've heard some stuff and am really worried about him, is he alright?" Ritchie snickered at my concerns. "What are you his Mom or something? He's fine, he should be back here around five o'clock, I'll tell him you called." In the middle of me saying "Thanks and good-bye" he hung up the phone, as there is no room for manners in his line of work. I waited until five o'clock watching the minutes on the clock tick past and when five o'clock came and passed by with still no phone call, I couldn't deny to myself that I wasn't stricken with distress. Falling asleep wasn't easy either. I ended up crashing out on my sofa watching T.V, half expecting to hear of another murder on the news and it being T.J.

Forgetting to put on my eye mask before I went to bed, I was woken up the next morning by rays of the sun beaming into my living room. When I sleep I am a creature of darkness, avoiding any window light at all costs. Staggering to the coffee pot not used to getting up this early, my first thought that day was T.J and why he hadn't called. A million thoughts rushed through my head like a steam train...is he ok? Is he not calling because he is still mad from our last breakup? Has he moved on to someone else? Is he in any trouble? Did Ritchie even pass on my message? The thoughts were an endless infliction, consuming my entire day.

Until finally he called my cell phone later in the afternoon, relief swept over me when I heard his voice on the other end. "Thank God you called, I have been so worried about you, are you alright?" I jumped in without letting him get past saying "Hello". "Yeah, I'm fine. Ritchie told me you called his house looking for me yesterday and gave me shit for it saying you were upset or something, what's up?" I knew I would have to be delicate about asking what happened to Adam, thinking he'd be a mess over it. "I heard from Marcus that something happened to Adam and I got worried about you, what is going on?" T.J. sounded scared, for what reasons were beyond my knowledge but I was going to find out, he replied "I don't want to talk about it over the phone. Are you in town so we can meet up or something?" It was obvious I wanted him to know that I was more than willing to lend my shoulder for his problems. "I'm home now if you want to come over whenever you feel like it." He didn't hesitate in taking me up on the offer. "But I won't be able to get there until later, I'm downtown at Ritchie's place unless you want to come pick me up."

It was more of a request than a favor to myself which is what he was making it out to sound like, knowing him all too well I didn't make a fuss of his ill-contemplated attributes. I got the address off him and made my way into the ugliness of the not so dazzling parts of the Palm Beaches downtown area. Rolling up my windows and locking the doors to my truck I nervously drove through the rough streets trying to find Ritchie's apartment complex. Knowing all too well the history of the area, it's not a place a lone white girl in a nice truck wants to be seen, many reports of the locals rushing up to a vehicles with a weapon demanding money, cars, or just angry and out to hurt someone. I was speeding through the streets wanting to get out of there as quick as I could. A sad world we live in with so much hurt everywhere you look and nobody wanting to do anything about it, just accepting the hopelessness of never being able to achieve anything more than what our civilization has succumbed to. Being among one of those people, we were similar in so many ways. Only separated by our own personal fears and the different direction they pulled us into.

I drove straight through the open gates at the entrance to the complex and parked on the gutter in front of Ritchie's block of units. A crowd of people stood outside the blocks I was entering. Being hit on and offered drugs simultaneously my cheeks went flush and I put my head down not saying a word. Walking up the corridors of the staircase looked like a scene out of a horror flick. Graffiti covered the peeling of green paint on the walls and the pungent stench of something rotting, only to the worst of my imagination, filled my nostrils. I could hear babies screaming

through the thin walls and trying to find the unit number was difficult from the sporadic flickering of the fluorescent lights above me.

At last I found Ritchie's one, quite astonished with myself that I even made it this far. I had to knock loudly on the door a few times before a young girl answered the door with eyeliner bleeding down from her eyes, her jet black hair was strung out and a mess and she looked off her face on some hard drug. She had only her bra and a short skirt on to cover her private areas and a cigarette hung out of her mouth to complete the full picture of terrible state she was in. She looked me down with contempt and snubbed at me "What do you want?" I maintained my politeness and told her T.J. was expecting me. She opened the door and walked away, leaving me by myself to venture through looking for T.J.

Passing through the kitchen it looked like a hospital lab with syringes on the counter tops and medicine containers lying around everywhere. Minding my steps through the dirty house, I walked to the back to the living room and found T.J. in a K-Hole strung out on a filthy couch. "Hey...there" he acknowledged me with a giant smile spread across his face. He probably didn't even know who I was from the dreadful state he was in. My first look at him in months and I was in utter shock. My jaw must have dropped to the floor at the very sight of him. Never seeing him so skinny and unhealthy looking I took pity and wanted to help him before things got even worse and he ended up like Adam, dead.

"T.J, hey buddy its Jenna, remember I was coming to pick you up today. You don't look so good, what are you doing so messed up?" I don't think he could even understand what I was even saying because he could only reply by giggling and rolling over, patting the couch as if it were a fluffy animal. I stood over him now and raised my voice so he'd know I was serious and snap out of it a bit. "Get Up T.J, Now!" I ushered at him to get off the couch, repeating myself a few times over and with no response I knew I had to get physical. Rolling him back over to face me again I smacked his face hard and I'm sure it stung but I got the reaction I had wanted. He sat up and looked at me confused.

At least now he was able to focus on my words requesting him to come with me. He was getting up from the couch and stumbling around before falling down to the floor again. Putting his arm around my neck and carrying the majority of his weight, I helped him up many times over and down three flights of stairs into my truck and drove him back to my place. It was a triumph on it's own arriving downstairs in one piece. Being the only person who really cared if T.J. lived or died I felt like the responsibility of helping him was my concern alone.

Thankfully Jeffrey was in Palm Beach for the next couple weeks entertaining royalty, which gave me a little time to try and clean T.J. up. I called a few of his friends that I knew and asked them not to score any

drugs for him any more, pleading with them and telling all of them he was on the brink of death, reminding them of the friendship between us all that once existed before the drugs corrupted so many of us. Some of them laughed at me telling me I was wasting my time with T.J and others were nice enough to at least lie to my face politely and promise not to help him feed his addiction.

I just wanted to remedy all of his pain and problems but I felt so helpless fighting his battle against the streets. I bought some marijuana for him to smoke hoping to subside the withdrawals he was facing over the next few days but with no avail. The only thing that would help him was my Xanax, a few of those pills and he would go back to sleep, only waking up to get more of them. I would have to force him out of bed to have a shower once a day and make sure he ate something. He was more like a baby right now than he was a boyfriend, too much in need of something I couldn't give.

Chapter 17

When I went to see Jeffrey over the next course of days he picked out the dilemma I wore spread across my face straight away. "Your back with T.J aren't you" It was so funny that he knew me so well. "Yeah, he's in a real bad place in his life right now and needs my help." He looked astonished and replied, "You're a much better friend than I am, I know people like him and trust me they never change, no use in even trying" I believed him too knowing I was stupid for even attempting to change T.J, but my heart felt differently, he was still a human being and a good friend of mine just down at his worst. "That's what good friends are for" I laughed back at his remark, not wanting to take this conversation too much further. "I admire your loyalty at least, but take my word for it, he will hurt you again." His words were chilling but true, I had to find out for myself though.

Almost seeming like an actual friend for a second he ruined his brief momentary image by turning over from the unfinished massage that I was giving to him and acquired his sexual longings from my worn down soul. Not only did he know that I didn't want to endure any more demands tonight, but his energy enhanced from knowing it too. Looking up at him during the foreplay, it was an easy observation from the look in my eyes

that I hated every minute of it, seething through all of my duties until he climaxed.

Most days I could take this kind of treatment, it was only seldom I couldn't hold in the way Jeffrey disregarded my feelings. He had me just where he wanted me, like a pawn piece on a checkers board I was his own personal sex slave. For the remainder of the evening I stayed quiet, not sure of what to say after an episode like that. It was a vigorous display of how calumniating he could really be. He required me to clean up his spilled semen off of his genitals with a wet warm washcloth before he retired to his bedroom for a good night's sleep. Only a monstrous creep could sleep easy at night knowing what pain he caused others.

I went downstairs and asked Juan, who was still in the kitchen to pay me for the evening telling him that Jeffrey had gone to sleep for the night. It wasn't an unusual request. Juan would often have to fix up "the girls" after the sessions and sometimes even drive them home. He went to Jeffrey's desk and underneath was his duffel bag that always held insurmountable bundles of crisp hundred dollar bills. He took out two for me and handed them over. I thanked him and said goodnight, as I was always polite to Juan and his wife, Maria. His eyes were gentle and told me more than what he was allowed to say. I understood well. We all needed to eat and pay bills unfortunately even sometimes at our own moral expense.

Putting the keys into the ignition I started up the engine and reversed out of Jeffrey's driveway with promptness. I didn't want to be there a moment longer than I had to. Not much to look forward too getting back to my apartment either, I needed some time to filter my emotions. Parking my truck in front of a nearby beach I took my shoes off gradually stepping out of the door into the fog. I walked down to the edge of the sand where the water licked at my toes. My life was slipping away from me and I was really beginning to question the difference between living and dying. I was so tired of everything, my whole existence revolved around being everything to everyone, forgetting about being something for myself altogether. Pretending to be someone else became an attribute I was better than good at, probably much of why Jeffrey liked me in the first place. This time I held back my tears back and only let the anger fester into a deep pit in my stomach. My rage was aimed at the very people who abandoned me to fend for myself in the first place and accepted this life as normal for me, my parents.

When I got back to my apartment I was expecting to have to look after T.J, but to my surprise he had come around good that night. He greeted me at the door and asked how my evening was. "It was all fine" I easily lied. I never let anyone inside close enough to see my vulnerabilities. They were mine alone to battle. In my head they were too shameful to

talk about anyways. He wanted to talk about something else anyways. Sitting me down at the dining room table he began his spiel. "I know you don't think much of me anymore, how could you? I'm a junkie who steals and sells drugs for a living, but I promise that's all going to change now. Adam is dead because of me and the only way I can make it up to him is to get away from it all. I promise things are going to get better." It was a convincing talk, but I knew him all too well. His demon inside yearned for him to fail but who was I to second-guess him out loud, I could only try to give him hope. "No one is perfect T.J. At least you're trying now and that's all that matters to me. I am so proud of you." I gave him a sincere hug and kissed him for the first time in a long time. "I love you," he said to me and I returned my love back. We slept in the same bed together that night and were officially back on together.

Two days later I was gone again, beckoned to be in Santa Fe. Ghislane only told me that I was to meet someone there, not sure of whom that was. It wasn't my place to ask questions. As far as I knew it could be anyone and I had no choice but to be compliant to their needs. It was the middle of the day when I arrived at the airport. One of the ranch hands came to pick me up in a big work truck that smelled like dirt and sweat but I didn't mind that's what I loved about the countryside.

When we arrived at the mansion my guest was already there waiting for me. I couldn't wipe the look off my face as he turned around from the bookshelf that he was standing at. "Hello" that same old cheesy grin greeted me once again. It was his highness Prince Andrew, and what a sight. He wrapped his arms around my waist and greeted me like an old friend. I hugged him back rolling my eyes at the same time, already dreading what lay in store over the next couple of days. My job was to entertain him endlessly, whether that meant having to bestow him my body during an erotic massage or simply take him horseback riding. For the next couple of days he was to be my only concern, but he wasn't. I called in checking on T.J a few times a day, not wanting to be a nag but just hoping he hadn't had any thoughts about relapsing. He was doing great, even applying for a couple jobs. Being reassured by him made my time away less complicated and thankfully with the help of my ever-ready Xanax I was able to cope with the ordeal.

The mansion was completely empty save a couple of maids who also cooked our dinners for us, and a couple bodyguards that we hardly even saw at all. The time dragged by slowly for me as I was counting down the hours until I flew away again, anywhere but here I thought. It wasn't easy meeting the sexual desires of these strange men, the Prince being one of them. He loved my feet and even licked in between my toes. Then there was the lack of passion in the intimacy we shared, to him I was just another girl and to me he was just another job. Not the right reasons to be

together but I thought in this world and to these monsters, there didn't need to be a reason. To them it's nothing but a reenactment of their personal fantasies. To me it was a living nightmare.

Thankfully one of Jeffrey's assistants from New York called me on my cell phone early in the morning on the second day to fill me in on my next adventure. I had a flight booked for me to leave that afternoon to arrive at La Guardia airport in the evening. Even though I had to go back to yet another controlling man, I was still relieved. At least I was used to the confinements of Jeffrey's control and in some twisted way he was more comforting than these strangers he sent me to. Overlooking the city of New York as the plane landed felt like I was flying from one cage to another. Entrapped by falling victim to the predators that lured me into their enclosure. I didn't know how I would ever get out again. That deep pit in my stomach began to churn again, a physical reaction to the anxiety I was plagued with. Before getting off the plane I touched up my make-up to hide any signs of the frailty I was feeling.

Jo-Jo met me at the arrival terminal and picked up my luggage for me. He never said much at all, nodding to any reciprocating conversation. I don't think he could really speak that good of English anyways. It was better for me as I preferred the quietness for the moment. He opened the back door for me and we headed off for my next prison cell. When we got to Jeffrey's mansion on 72nd, the place looked empty. I walked up the staircase to Jeffrey's office and he wasn't there. Feeling a bit hungry I walked back down to where the kitchen was. I opened the fridge and found some leftovers that Adam, Jeffrey's chef, had cooked. I loved his cooking, when it wasn't filled with beansprouts and tofu. He used to make me the best pizza upon request, or whenever he was cooking seafood, which he knew I hated. He had an honest appeal about him and never even took notice when on many occasions us girls would be prancing around topless, sometimes even stark naked around the pool or beach. He would have to serve us our meals and would do it with such a casual professionalism, never making anyone uneasy at any occasion.

Half way through my meal the kitchen doors swung open and incoming was Jeffrey and Ghislane. Choking down my bite of food down, I got up from my seat and kissed them both on the cheeks. "Hi guys, how are you?" I greeted them and Ghislane answered for them both "Good, good. Sit down and finish your meal, don't let us interrupt you." I hated eating alone in front of people, chewing food and maintaining a conversation at the same time didn't give off the best look. "I was just finishing anyways, can I get you guys anything, maybe a tea or something?" Always playing my part, another reason to keep me around I guess. I went beyond the call of duty and after the last period with them, I had been reminded of my place. "Yes, I'll take a one" Ghislane stated. "Jeffrey how about you,

anything I can get for you?" I asked again and he answered, "No thanks, we just ate and I'm still full!" and they sat down together on the stools at the kitchen bench.

I got out the shiny red kettle from the cupboard, knowing my way all too well around the kitchen and put it over the hot stove plate. Turning around to face them, I thought they were acting peculiar. "So..." Ghislane started the conversation, "How was the ranch with the Prince?" It was a natural reaction for me to blush, knowing exactly what she was referring too. Keeping busy preparing her cup of tea and avoiding eye contact with both of them I started to unpack the counter where I had been eating, "I think he had a really good time, he seemed relaxed during the trip and when we said good-bye to each other he gave me a kiss." I went on to tell them what we did together "I took him horseback riding, nowhere to far just around the property, um... we went swimming in the pool, and of course I gave him plenty of massages. He had a massage at least couple times each day really seeming to enjoy his time there." It's what they wanted to hear, not the truth of how disgusting I had felt over the whole thing but they already knew the truth anyways, it's what they had trained me for in the first place.

Like two proud parents they both looked over me with such content. "Good, you did really well!" Jeffrey complimented me. Turning around to the boiling kettle, I finished Ghislane's tea for her and the conversation led on to other subjects. We all ventured up to Jeffrey's office and out came the infamous duffle bag that went wherever he did. I was given close to a thousand dollars for my time in Santa Fe, more than what I thought anybody at my young age could make for a couple days of work. It was fulfilling the obscene vulgar needs of the so-called privileged that earned me so much.

Chapter 18

I spent the next few days in New York, venturing out to do some shopping therapy. I loved the eccentric parts of the city. Every street was different but the same energetic vibe filled all of them, animated with all different walks of life. Hanging out at coffee shops reading the newspaper or a good book was a favorite pastime while in the big apple. Being close enough to get back to Jeffrey for when he needed me but also far enough to get away from all of it. Most of the day slipped by without being missed and I made my way back to Jeffrey's.

Making one last pit stop, I walked into an old bookshop to browse at their assortment of old titles. I wasn't in any hurry so I took my time

reading the backs of interesting looking books. I bumped into a girl looking down the same aisle I was down. "Sorry, I'm so clumsy" she was apologizing for my mistake. "No, no, it was my fault, I wasn't looking at where I was going. I got so wrapped up with my nose in a book and trip over my own two feet if I'm not careful enough." We were both giggling now and I further introduced myself to her. Her name was Valerie or Vickie or something like that, anyways she was a student at a school for hairdressing nearby. Chatting away both young and similar interests in each other's choice of reading we found it easy to speak with one another. She wasn't from around here only being in the city for the last two months, her parents hated her being here, but were also supportive in her big decision to move from the countryside in hopes of her accomplishing her own dreams. Aside from not having her near them, they just wanted her to be happy and supported in her big decision to move to the city, helping her pay some of the way.

She was a pretty girl with cherry red hair and soft white skin. Her long legs were emphasized by the short flowery dress that complimented her hourglass figure. She would definitely fit the pro quo for going down in one of Jeffrey's little black books. Only imagining the look on his face upon meeting her I could already see his sly grin spread from ear to ear. Knowing exactly what he would do with her and the very thought of him tarnishing a sweet country girl such as her just couldn't be done. It was the beginning of a turning point in my life that started with realizing I had a choice at hand and the effect I could have on one person alone. "I must be off, but it was really nice to meet you." Bidding her goodnight and paying for my books I turned around with one last glance over my shoulder and said. "Good luck in the city!" Leaving that bookshop was a small step in a growing abundance of larger strides to come. Turning the corner onto 72nd street I had an undeniable feeling in the pit of my stomach again but this time it wasn't the familiar hurl of anxiety I was used too after I had done something I had wrong that I had regretted, it was a new feeling of pride and inner strength. I quite liked it a lot, I held my head high and smiled on the inside when Jeffrey asked me how my day was and what I got up to, not mentioning I had let one girl slip on bye.

The icy winter winds faded away making way for the approaching sunny days that blossomed the colorful shades of spring. This was my favorite time of the year. Making the most use of his island we spent countless days of the increasingly hot days there. A constant array of visiting guests and plentiful young women to flock around keeping them entertained was the typical lazy afternoon on Little St. Jeff's. We ate, drank, and played under the blue blanket of cloudless skies. To many this lifestyle could seem idyllic, unless you were like me, the one on the other

side of the fence where the grass wasn't so green. Fortunately for me and in some ways not, I was mostly expected to attend to only Jeffrey's insurmountable of sexual desires. Whereas the other girls who came one day and went the next were promised a multitude of open doors just for there meager participation in sexual acts with random men, only to be disappointed when they realized they were nothing more than a single night out for these geriatric senior citizens who most likely due Alzheimer's would sooner forget the entire experience let alone their first name.

Surrounded by those in our world who many looked up too but not seeing them from where I was standing, I didn't have the highest of standards in humanity. Then I met Al Gore and his lovely wife during one of those many weekends away in the Caribbean. I was blown away by the amount of attention Al doted on his wife, it was so sweet to watch. They sat next to each other at the dinner table gazing into one another's eyes having an intimate conversation between them. Among the many guests visiting that night and many of them young beautiful women, not once did Al's eye's stray elsewhere, to them they were the only ones there. He was up for a presidential election that year and he definitely had my vote. Anyone that could show that much devotion and passion towards his loved ones could have the same devotion towards running a country, or at least I thought so. He only left his wife's side to have a walk down to the beach with the host of the weekend, Jeffrey. The weather was still warm in the evening when I decided to break away from the idle chat around the table and take a stroll too.

Not wanting to interrupt the conversation between Jeffrey and Al, I walked in the opposite direction plucking the washed up sea shells imbedded in the sand along the way. I enjoyed the serenity in the solitude of the island. So many nooks and crannies to get lost in, I could imagine that I actually disappeared from the entire world for a moment. By the time I came back to the main house majority of the small crowd had been long gone retired to their cabanas. Even Jeffrey had gone off to bed but trust party animal Ghislane to still be up entertaining the remaining guests left at the table, regaling her wild stories of people and places she has embarked on. Trying not to make eye contact as I walked past them on my way back to my cabana carrying my seashells inside my curled up blouse, I wasn't up for anymore pointless talking tonight. Emptying out my seashells into a plastic bag, I went over my new treasures one by one. I loved collecting odd things, shells being one of my favorites.

Ghislane and I shared that interest together. We would enjoy walkabouts around the island searching for lost pieces of the remnants that pirate's had left behind centuries ago. It was mostly broken plates or smashed glass from bottles of ale, and even occasionally getting lucky

enough to find some old coins here and there. It wasn't easy though, both loving a challenge it was perfect for us. Enduring many scratches from the bushes we would be searching through and then the soar arms from digging all day, but it was worth it in the end. After nearly two years of collecting items and saving them, we made Jeffrey a mosaic table out of the remaining pieces left from the era of the pirate's day. Upon completing it we were both astounded in our creation, it was such an item of rarity and an interesting piece of work. When we presented it to Jeffrey he was even impressed not only in our amazing finds but what we did with them. The table became an important work of art that Jeffrey showed off inside the main house's lounge room, sparking a much intrigue and table conversation by many of the visiting guests to his island.

The next morning was good-bye for most of the visitors, leaving just the usual behind. Soaking in the sun and living it up in the lap of luxury is how the next few weeks were spent before having to get back to the dredge of the city. Sometimes we'd have to go to St. Johns island for Jeffrey to do some work in the office. It was so boring for me to sit in their listening to him on the phone or coming down on some poor employee for something stupid like not answering the phone correctly. If I knew he was going to be awhile I would excuse myself for a bit of shopping. Not that the Caribbean had much to offer in the world of fashion but there was never an amount of bikinis one girl could own and I loved all the little knick knacks one could find there. Flying back on a private jet was the best part because I could transport just about anything I wanted back to my apartment, which was already filled with an assortment from my shopping ventures and collection of seashells from the Caribbean.

The next big dinner party on the island had another significant guest appearance being, the one and only, Bill Clinton. He is the only president in the world to be dismissed from his role as a world leader because he was caught with his trousers around his ankles and had the stain to prove it. Publicly humiliating his wife and himself he retired from his title but not from his lifestyle. This wasn't a big party as such, only a few of us eating at the diner table. There was Jeffrey at the head of it all, as always. On the left side was Emmy, Ghislane and I. Sitting across the table from us was Bill with two lovely girls who were visiting from New York. Bill's wife, Hillary's absence from the night made it easy for his apparent provocative cheeky side to come out. Teasing the girls on either side of him with playful pokes and brassy comments, there was no modesty between any of them. We all finished our meals and scattered in our own different directions.

Jeffrey wanted his evening massage before bed and Ghislane and Emmy went to their office to talk about something, leaving our guest of honor to find company elsewhere. Strolling into the darkness with two beautiful girls around either arm, Bill seemed content to retire for the evening. He wanted to have a hot bath before bed while I began the massage in the tub. Starting with his feet and calves, he wanted to end the night quickly. Never showing any restraint he sat up on the edge of the tub and asked me to preform on him orally. I did my job, but that's all our relationship was these days, a dreadful job. Getting it over and done with as quick as possible was my hope but I couldn't let him pick up on those vibes, to make him enticed I had to act like his little porn star, knowing exactly how he wanted it. Only then would my duties be fulfilled and I would be able to get back the reality of my complicated life. Before I could say goodnight, Jeffrey had one more request. He wanted me to tuck him under the blankets and fluff his pillows for him. Then I had to reach under the covers and massage his feet while watching him fall asleep, he even wanted me to wait like twenty minutes or so after he fell asleep before I could leave. It wasn't unusual for him to ask it but God I hated it, never offering it I would always wait for him to request it. Once he was snoring gently I wiped my hands clean of the lotion and quietly closed the doors to his room. Making my way up the outdoor spiraling staircase, I felt the breeze blow through my hair and looked up to the heavens. The stars shown so bright out here in the middle of nowhere with no big city lights to hinder their effect I could get lost in time staring into them. No matter how far gone I really felt there was always something about a simple caress from the wind or the reflection of the star sweeping sky in the black glossy ocean that would always remind me of my fond love of nature's blessings.

Back in New York, there was nothing left of nature to adorn. It was a dwelling for those who no longer saw the use for trees without cages or blue skies without clouds of man made fumes and gases. Unfortunately if we weren't in the Caribbean, we were there in New York. Hardly going back to Palm Beach, barely even seeing my family, my dog or T.J these days at all. In my parents heads I was all grown up and educated in the world of wealth not needing them any longer they would just wait for my call once in a while to let them know how I was doing and that was the extent to our restricted relationship. The road my life has led down never has kept me close to home anyways so to me it wasn't anything unordinary but still a sad existence to be without a family of my own. It would've been nice to be missed though, rarely letting myself think like that. No room for pity in my heart, if I did, the floodgates could open and I'd have enough grief in one lifetime to go around a few times that they would've never been closed.

Jeffrey's business was running well from the looks of his attentiveness the office he owned in the Upper East Side of Manhattan. Alan Dershowitz, his colleague in finances and personal solicitor, a bird of the same feather, I had seen hanging around the island and Jeffrey's Manhattan mansion, more and more these days. Alan's taste for the young and beautiful was a bias for a blooming business relationship between him and Jeffrey. After an explicit session of Jeffrey's vulgar pilgrimage into my body, we were interrupted by a knock at the door by Jeffrey's good friend, Alan. I wrapped myself up in Jeffrey's pink bed sheets, which is the color preference he chose to sleep in because it reminded him of the same color of his own words "Pussy", and covered my face from the unexpected intrusion. Jeffrey got up and wrapped a towel around his loins and answered the door completely calm. Opening the bedroom door and letting Alan inside they began to converse about business immediately, right in front of me. Jeffrey started to tell Alan what needed to be done while he jostled some notes down quickly. I peeked my head from underneath the covers thinking they were too wrapped up in their work to notice me get up and dressed, and Jeffrey turned back to me and told me to just stay there this would only take a second. Going back to Alan he turned his focus back into work and hustled out a few more orders before letting Alan out of the door and returning his attention to me.

"Sorry about that, work never stops and neither will the money coming in. How else am I going to make a million dollars while I'm sleeping?" Jeffrey chuckled as he sat back down on the bed next to me. I laughed at his humorous and mostly true statement, then a strand of hair fell in front of my face. Before I could get to it he put it back behind my ears and sweetly stroked my face, for a moment we just looked into each other's eyes and he nearly seemed almost human to me. It was bizarre how he could be so kind and gentle one moment and the second beforehand I was being treated like no more than a common plaything left out for display. Nothing more than an ego trip, Jeffrey got off on letting the ones he wanted to know that he could own anything and anyone he wanted in this world. Maybe for a brief minute I believed the sincerity behind his eyes but that vision would quickly fade away and I would be left second-guessing why I even fell for his deceitful tricks for a moment.

Jeffrey got up from the bed and asked me to join him for a shower. In his bedroom, which was the entire top floor, he had a glass shower enclosed underneath a glass skylight right in the middle of the room. It was perfectly accessible feature for a man that loved both being clean and nude, but still an odd feature at that. As I always did whenever I showered with him, I lathered a loofa with soapsuds and would scrub his body, up and down, in between his toes, even behind his ears and of

course his genitals area. The sunlight shown through the glass ceilings into where we were standing, making the moment feel even more surreal on top of the already popped Xanax I had popped before for breakfast earlier that morning. Jeffrey was in such a lighthearted mood that day, making funny cracks at me, and acting like a flirt. When I was finished washing him he actually wanted to wash me too, which was another totally out of his character suggestion.

For the rest of the day, he took me everywhere with him, the office and then to a friends place, even just wanting to hang out with me for a while. I wasn't used to being treated like anything more than a dog on a leash, when he acted like this it just completely spun me around confusing me even more.

We were spending heaps of time together these days, a lot more than usual. At the ranch we would do things together, alone, and not just the usual perverted things I was accustomed to doing with him alone. Horseback riding on his ranch during weekends away by ourselves and movie nights snuggling up over a bucket of popcorn instead of having to massage his feet during the entire film became his way to alter my perception of my original notion that I wasn't just his sex slave, I thought I was finally becoming his friend.

When we went quad biking he no longer wanted me to take my own bike, he preferred me to sit on the back of his, holding onto him tightly and he even tried to teach me how to drive a manual stick shift car. He was definitely trying to show a softer side of himself, different to the stone cold slave driver I had to come to respect out of fear over the many years. Still a hard image to change after all I had been through and seen over the years I had been with him. Nonetheless he was still my "boss" so I humored his attempts and matched his caring demeanor, giving him the impression I was intrigued in our new kind of affair.

Chapter 19

His attentiveness led into the warmer months that commenced the beginning of long summer days that I looked forward too. I couldn't help but enjoy his eagerness to see me more relaxed these days. He wasn't even bothering me to find alternate sources of girls for his twisted satisfaction anymore and although I was still being used for his distorted sexual enjoyments he further seduced me into believing I meant a lot more to him than I ever did.

It all came to a sudden conclusion one sunny afternoon in the Caribbean. Jeffrey pulled himself up to the ladders first step and climbed up the next four steps to the top of the dock. His chest was heaving rapidly as he sat down catching his breath. Ghislane was the next one up and then I followed lastly behind them. To me it was an invigorating snorkel around the shallow reefs within the radius of the dock, but to Jeffrey the half an hour swim in the ocean was enough to overexert his ageing limbs. I took off my snorkel gear and placed it in the storage bench, grabbing us a few towels at the same time. Wrapping a towel around Jeffrey's backside and handing one to Ghislane, I sat down next to them on the dock and we laughed how fatigued Jeffrey was, poking fun that he really is getting older. A very touchy subject for the vain at heart but he didn't seem to mind it, probably knowing we'd never take the joke too far. We sat there in silence for a moment, an odd silence at that. Jeffrey looked at Ghislane and then Ghislane looked at me, placing me once again in the spotlight. They both scooted closer to where I was sitting and I felt something stirring in the air. The biggest turning point of events in all of my time spent with them.

Jeffrey sat next to me and put his hand on my back and looked at me with a certain kind of sincerity I hadn't seen in him before. "I want to first of all tell you that over the last few years you have shown me the kind of devotion and loyalty that I believe is rare to find among people these days, qualities I hold that high in regard." Bewildered by the whole scenario I just nodded every time he paused, trying to grasp what his intentions were getting at. He continued to praise my nature saying "I hope you know my appreciation for your embracing of my lifestyle, you have been achieving a name for yourself among the friends I have introduced you to. Everybody says basically the same thing about you, the same thing I believe. You are a delightfully funny girl who has developed into a mature graceful young woman and I could think of nobody else I'd rather have a child than with than you."

And just like that he created a whole new dilemma for me to face. In utter shock from the completely unexpected proposition and before I could even think of anything to respond with, Ghislane made the finishing touches with the business end of the deal starting with the pros before the cons "You would have around the clock nannies to help you. Jeffrey would pay for a mansion of your choice in either Palm Beach or New York" and as if the drumrolls were beckoning "and... you would have a hefty monthly allowance from Jeffrey's bank account" Astonished at their first offers I nearly took the bait. Then she continued to finish the terms of our pre-agreement with "But you would have to travel with the child where and when Jeffrey wanted you to be, and most importantly you would have to sign a contract stating that Jeffrey and you are not

monogamous and that the child would belong in Jeffrey's custody in the event of a falling out between the two of you." She kind of threw that last one in there quickly, as if she could get away with me not hearing that I would basically have to relinquish the rights to my own flesh in blood and surrender them to a life of servitude and abuse with these people. My maternal alarm bells went off straight away and I already knew my answer. No way I could I do that to any poor baby, God only knew what these monsters had in store for me let alone a baby, but it was an instant reaction that saved me. "I don't know guy's, I mean I'm really young and never really even thought about having kids yet. Wow, I just don't know." I slicked my hand through my hair nervously and took in a silent breath. I had to go beyond what I was truly feeling and give them the feeling that I'd never let them down. Putting an eager smile on my face and sucking up my gut's intuition I told them "You know what, let me get my certificates in massage and have some time to prepare for this and get healthy then next year we'll all think about having a baby together." It was crazy to even hear me say out loud but from the expressions on their faces I had fulfilled their wishes.

Much reason to celebrate that night they were both in a cheery mood around the dinner table. Except for me who had taken double the dosage of Xanax to even cope with the high amounts of anxiety I had been suffering from since we got back from the dock. I wasn't sipping the champagne that night, I was gulping it and when their moods turned from cheery to raunchy later that evening it wasn't hard for me to comply. From the full effects of the state I was in I would've agreed to just about anything, allowing them to treat themselves to ravishing the tender parts of my body.

Over the next few weeks everything went on as it normally would, and not another mention of their proposal. My birthday was only a week away and I was turning nineteen that year. All I wanted was to get my certificates before I got any older and get trapped into this life for good. When my big day rolled around I was in New York with Jeffrey and Ghislane. Sitting on my bed listening to MTV's channel blare in the background of my room I was painting my toenails when I was suddenly buzzed on the intercom. It was Jeffrey calling himself to ask me to meet him in his office in ten minutes. Perfect timing to let my nails dry I thought to myself. Already contemplating his desire to come downstairs I knew it had something to do with my birthday present but I was more expecting the usual shopping money or piece of jewelry, definitely not what he had in store for me.

I knocked on the slightly ajar door to Jeffrey's office and heard him beckon me inside. "Hello, what cha up too?" I asked in a cutesy tone of voice. Walking over to his desk he looked up at me taking his reading

glasses off while granting me a big smile. "Come over here and sit down with me" as he ushered me to come sit on his lap. Pulling me onto him he had a funny look on his face, like he had something really big to tell me and was letting the anticipation build in the thickness of the silence. "What???" I laughed at the way he was looking at me now. "First of all... Happy birthday today." Was only the beginning of his announcement and he proceeded to tell me "I know how much you have wanted this for so long and you are more than deserving of it. You are going away to Thailand to learn authentic Thai Massage and within eight weeks you'll receive a certificate for being a qualified Thai Massage Therapist." Astonished at his attempts to see me get what I wanted, not exactly the type of massage I was interested in but it was a start and a first certificate for me to acquire. My eyes lit up and I threw my arms around his neck, planting a big kiss on his lips, which I rarely ever did.

"Wow, I don't know what to say, this is beyond my wildest dreams... thank you so much!" I did well to let him know I appreciated his grandeur offer. He went on to give me the details of where I'd be staying, the school's schedules, and how much he loved Thai massage, apparently it was the next big thing to hit the shores of America. He had planned out an entire itinerary for me. I was to depart at the end of August and he had already enrolled me in a class at "ITM Massage School". I would only have a few days to settle in before I would be attending classes five days a week over eight hours a day. He even had an assignment for me to do while I was over there. I was to meet up with a girl who was also being put up at the "Princess Hotel" where I was staying. She had an Asian sounding name so I just assumed she was a local girl hoping for an opportunity of a lifetime, if she only knew what she would be getting herself into. If I decided that she met Jeffrey's particular quota of approval then she would be sent over to the U.S to meet with him or one of his esteemed colleagues. Besides the guilt of having to decide a stranger's uncertain fate, everything else sounded more than wonderful. Eight weeks gone from Jeffrey sounded like a lifetime away and I couldn't be more excited at this chance. It was the opportunity of my lifetime and I wasn't going to waste a second of it.

Ghislane came in a few minutes later and the look on her face told me she already knew. I got up from Jeffrey's lap and gave her a big hug and told her, "This is so nice of you guys, Thank you so much!" She didn't share my enthusiasm of excitement. In a dull tone she responded, "I didn't have a thing to do with it, it was all Jeffrey's idea but good-luck anyways." She gave me her best impression of being human for a brief second and hugged me back. It was just her way and I had come to accept it. Depending on the level of slander her insults provoked was just her way of telling you she cares without really ever showing it. Probably

doesn't make sense to most sane people but after all of the time spent with them, I had gotten to understand a few of their quirky ways. Even if I didn't agree with them, they knew I would for their sake of opinion. What did it matter anyways I thought, I had been degraded in every other physical way what's the difference from taking their mental abuse too. Not the exact choice of employers I would've chosen over again if given the opportunity but here I was and doing my very best to excel at their demands.

I was sent home for a little over a week to pack for the long trip and make the rounds visiting my family before I left overseas on my first trip all by myself. It was great to see my family after such a long time away. My older brother and his wife even came down to visit for the well wishing of my departure. Everyone in my family seemed stoked at the prospects my long journey had led me down. Here I was jet setting around the world in my teens and getting paid to study the course of my dreams at a cost that I only knew I would have to pay. It was a wonderful get together with all of them around, a great way to remember them. If I'd only known it would be the last time I would see any of them I would've emphasized to my brothers how much I really loved them both and how much I would miss them in the decade to come! But I didn't know what my future held for me, I had nothing planned out I was just hoping for the right opportunities.

I also had a few good friends to catch up with before I went. Every night was another party and by the end of the week I had drunken enough to drown an Irishman on St. Patty's Day. I was given the lists to all of my friends email address and told to keep in touch. Yeah right I thought, I was going to be too busy having too much fun to be thinking about sitting on a computer emailing people, but I told them I would anyways. Save myself the point of having to explain that in many different ways to a group of already tipsy slurring teenagers. Out of everyone who was really happy for me, T.J wasn't. He hated the idea of me leaving him to have a non-stop party in Thailand without him. He was just starting to seem like he was coming good and I didn't like having to leave him at such a vulnerable state but in my young years I had already realized I needed to do some things for myself and this was one of them. There was still a huge amount of broken trust between us, trust that could probably never be rendered again so I thought I was being decent enough letting him stay at my apartment while I was gone, but he was not to drive my truck, at all. I paid too much money on insurance for that thing and knowing his driving record I didn't want the risk of something happening while I was gone for so long. He didn't agree with me at all, throwing a grown up tantrum all over my apartment. Hitting the walls and doors, shouting the entire complex down, there was nothing I could say or do at this point in

time so I just put my dog on the lead and took her for a walk to calm down the situation and give me some time to be alone. Mary Jane was the only one I hated leaving behind. When we got back from the long walk she barricaded my suitcase while I was packing the horrendous amount of clothing that I always did. I was promising her I wouldn't be long and told her how much I loved her giving her a big hug. I choked back on the tears that were swelling up in my eyes, it was like she already knew the night before I flew out to New York that this would be my final trip.

There was a commercial flight booked for me in the morning and I needed the rest that night to fully recover from my binge of celebration drinking. T.J crept into bed later that night and tried to redeem his behavior with sweet nothings and dry humping my backside. It did nothing for me sexually. I didn't feel like that for him any longer and the sooner he realized that, the better he'd be off. I told him I wasn't up for it and he picked up a pillow and slammed the door behind him. It didn't matter I told myself, the next day I was off and wouldn't have to deal with him or anyone.

T.J caught a cab with me to MIA, the airport in Miami. He walked with me to the furthest point he was allowed to go by the security gates and as we stood in line together it was almost heartbreaking seeing him cry. I told him I'd try to call him everyday, attempting to give him optimistic ways to look at this time away from each other. In the end he had me crying and I had to give into my remaining feelings I had for him. One last kiss under the x-ray bridge and he vanished out of my sight as I furthered down the terminals long hall.

Chapter 20

It was only a short flight to New York and I just couldn't wait until next week when I'd be jetting off to an exotic destination all by my lonesome self. It was all I could think about talk about and dream about, finally my break. Ghislane did what she did best that week and prepped me for everything I could imagine under the sun. Do's and Don'ts, emergency numbers and western union locations were among some things on the list she gave me. Like I said, she showed her caring side in other ways. There was also the name of the girl I was supposed to be meeting, the room she was in and what dates she would be staying there.

When I got out of Ghislane's office I was instructed to meet Jeffrey in his office. She had to stay back for some paper work that she had to catch up on pronto. Making my way up the red and gold trimmed carpeted

staircase I prepared myself for some major sucking up before I left, he would be expecting it for his recent generosity, or so I had thought. Opening those familiar heavy doors the first thing I saw was an unfamiliar face standing over Jeffrey's shoulder.

She was a tall girl with blonde hair twisted up in a professional looking knot. Her big smile was flashing at him with hints of her cheekiness to come and she was dressed to kill with a short tight grey skirt and a matching suit jacket over her white buttoned down blouse, revealing her voluptuous ample cleavage. She looked like the old college professor's wet dream. When she introduced herself to me, a thick Czech accent presented itself. Her name was Nadia Marcinkova and Jeffrey looked just about as smitten as a victim of a love struck arrow from no one but the cupids themselves. Jeffrey further introduced her as his new assistant and masseuse while I would be away, barely taking his eyes off her for one second. It was a bit of a blow to take, being so easily replaced but also a part of me already knew this was expected off someone like him. Good for him I thought to myself, why should I have bitterness over someone I never had intimate feelings for and knew had never really cared for me in the first place. Kissing her on the cheeks and telling her my name, I was doing my best to grin and bear it. We hugged for a brief show of uniformity but it was just that, a show for Jeffrey to see. When he was away for the moment or she wasn't busy hanging off his every word, the way we all started out, she would snub me off to only head off in another direction. A real bitch if anyone was to ask me but no one would anyways it wasn't my job to like her.

Over the next course of days it was my task to show her some of my techniques in massaging Jeffrey and the erotic side of finishing it off. Nadia despised me even more when Jeffrey told her to follow my lead during the massage as she tried to take over and do her own thing a few times. To me it was quite funny her competitive side, I had nothing more to prove so watching her put on an act of seduction and scream out her every body function during a faked orgasm was nothing but entertaining in my eyes. After a few sessions together it was my time to be off on another adventure far, far away from here or from the chains that I wore for way too long. Jeffrey had someone else to fit the chains that kept me so close to him. Even though she wasn't the nicest of girls I still couldn't help but feel sorry for her. No girl should belong to someone out of servitude, but unfortunately it is the way our civilization has been for many centuries before us and I don't see changing any time soon or as long as perverts like Jeffrey are allowed to walk around freely and procure our daughters off the streets all because he's got a lot of money to pay many, many, many people off.

Throw out your confetti because here I come Chang-Mai!! My celebrations started the second I landed, it didn't take me long to make myself aquainted with a few fellow travelers and find the hot spots of the hustling city. It was like nowhere I had ever been before. The streets were lined with stalls offering an assortment of souvenirs, clothing, and knick-knacks. Everyone lived so freely and was in such great spirits. The parties raged on until the wee hours of the morning and people became best friends over night. From the second I got there I knew Thailand was going to be a lot of fun and I was right! Popping bottles of champagne, dancing all night to the beat of every club's rhythm's along my way and carrying on like it was my birthday...every night was a repetition I could definitely get used too. During the day I was a real good girl, the teachers pet even. Showing the credibility of my experience in massage from over the last few years and already ahead of the class the teacher was using me to help instruct the others with demonstrations. Mostly in a class full of males it wasn't a surprise that I made friends with quite a few of them, some of them with ulterior motives, but for the most part the sleazebags were none of my concern, I had already dealt with a lifetime of them to be able to spot one out and steer clear of his approaches. Out of the entire class I had made friends with only one girl from Wisconsin. She was a plain looking girl with big brown puppy dog eyes and a long drawn out accent. Her first time leaving the States or Wisconsin itself for that matter so it was easy to acknowledge that she was a little taken aback by all of the bustling city life so becoming her friend felt like I was doing a good deed showing her around the hot spots of the Chaing-Mai nightlife. Eventually I even ended up inviting her to stay with me at my hotel. She was running out of money to party every night then pay for school on top of her accommodation, it was all becoming too much out of her small budget. So I thought about it and offered her a bed in my room, I had two of them anyways. Plus she was a really nice girl and if I could help make her first time out of the country an unforgettable experience then I was also gaining something from it as well.

The first month in quickly passed me by. Having such an incredible time on my own and putting my heart into learning Thai Massage it seemed to just fly past. Routinely I had to call in and check in with Jeffrey and Ghislane letting them know my whereabouts and progression in class. Counting down the time left until my course finished Jeffrey was anticipating my departure back to New York. "I can't wait to get my first Thai massage from you. I've got you booked to come straight back to New York for my first one as soon as your course finishes next month." His eagerness put a twisted familiar knot in my stomach. Reminding me of the dream I have to awake from soon and the reality of the certain homecoming I would be arriving to. "It's such a great course, thank you

so much for sending me here to learn this. You are going to love my new area of expertise! I am having such an amazing time over here!!” I had to let him know how much I appreciated what he had done for me and he loved the head swell that it would make him feel as well. Hating the thought of going back to him, I wasn’t going to let that put a damper on my spirits while I was still out there. It was my time to party harder than ever before. Every night was a new adventure for me. Chang-Mai was a maze of places to get lost in and the vibrant city was my playground. The way I saw it this was my last chance to get out and break free, letting loose my inner girl it felt so good to take the lead of my own life.

Chapter 21

It was an average evening getting ready in front of the bathroom mirror on just an average Sunday, though unbeknownst to us girls as we sat there chatting away carelessly, this night was already written in the stars for me. It was a very long time ago now when I was still a young child that I sat looking up to those same stars from my bedroom window with my hands pressed tightly together as I cried for God to hear my prayers. All I asked him for was death. My precious life was already such a hopeless battle that I felt too small to fight alone for. Begging him to deliver me from this cruel world I would pray for all of my pain would to away for good. My only clause in my prayers was the possibility that there was somebody in this wide world that I was meant to love, something much bigger than I could have even imagined yet. This invocation of mine was forgotten about long ago now, until tonight.

I wish I had known that night I sat crying beneath the stars that it would all be different one day and that I hadn’t sold myself short to the accustomed lifestyle I was brought up to believing was acceptable. It was this night my very soul was about to cosmically collide with the man I was always meant for, the man my heart already belonged to and would know from the instant we met. This night would be the first day to the beginning of my new life to come.

I blushed my cheeks and put on my mascara before me and my girlfriend headed out to hit the town. We were dressed to kill and looking for something to do when we ran into a few of our class mates at one of our favorite drinking spots. They were meeting up for some drinks before a Muay-Thai kickboxing tournament. It sounded like fun when they invited us along to watch it with them. The massive crowd lined the street where the fight was being held and once I got inside the arena it was push

and shove to try to find a spot to watch from. The friends that we were hanging out with were meeting up with another group of guys that were training for the kickboxing tournaments that we were watching. Then it happened it was the first moment I laid eyes on the man that would love me for the rest of my life. I wasn’t expecting the most amazing time of my life to happen right there and then but it did and I would never be the same again. Destiny fell right smack into my lap and there was no stopping it! It wasn’t just his smoldering appeal that was obvious at first sight it was the entire package of mannerism and chivalry that made him stand out of the crowd. Stepping right out of the pages of the fairytales I used to read, he was nothing like I had ever come to know before.

Watching him from a close distance he was playfully shadow boxing one of the guys from my massage class and it was at that moment that this handsome stranger first caught me staring at him. From top to toe this athletically built man was intriguing to watch, I couldn’t take my eyes off him like I was magnetically drawn to his power of attraction. He further interested me when he wasn’t acting like the majority of harping dogs that would jump at the eyes I was giving him now. Instead he coyly played hard to get, making me work for any conversation with him. The fight started and the men were going bezerk, screaming at the fighters in the ring offering either fighter their support or discrimination depending on whom they were batting for. It was like watching a primitive scene out of the days when the cavemen ruled the earth but it was as equally alluring to watch unfold, the sweat, the blood and the absolute brut fascination of it all.

After the fight and all of the men revved up from the fight, I suggested that we all head to the pizza joint in front of the Princess Hotel where I was staying for a late night snack. I made it my goal to make myself known to this appealing stranger. In the tuk-tuk on the way there I made sure I sat next to Robbie. Scooting my knees closer and closer to him on the short ride he continued his chase by moving further away from me, a game of cat and mouse that I loved. When he answered back the array of my questions he had the cutest Aussie accent that drove me absolutely wild.

Gradually we got to know each other better over a pie of peperoni pizza and two can’s of coke. Too me he might as well have been the only other person in the restaurant, he knew he had my undivided attention and I think he liked it. There was no one like him that I had ever met before and I knew there was no other who could make me feel the way that I felt at the first sight of him. Being charming and suave was all an accidental front. It was easy to read him. Immediately it wasn’t hard to see his sweet side, holding the door and pulling out my chair at the restaurant, I was

already smitten. After pizza he walked me across the street to my hotel where we made plans to meet up again. There was no kiss goodnight or anything like that. No, he was too polite for that, he wanted to prove himself different and different he was. Walking through the hotel's revolving doors I watched as he walked away and when he was finally out of sight, I sung my way up to my room. Floating on cloud nine I was free falling into a deep pit of love.

The next day I attended my class as usual but not able to concentrate like I normally did, too excited about when I'd be seeing Robbie that night again. As I walked out of class that afternoon even the teacher noticed a difference in my performance and asked me if I was feeling well, "On top of the world actually" I smiled back at the old instructor and it wasn't far from the exact truth either. I hadn't ever felt the churning of butterflies in my stomach and the constant thoughts of anyone else like this before. My girlfriend and I got a tuk-tuk back together as we usually did after school and I couldn't shut up about the night before. She was laughing at my girlishness telling me that anyone who just met me would think I had never been let out before, but little did she know that I had more than my fair share in experience with men and never had I ever come across anyone that could make me feel this way, and what spun me out even more was that it was such an instant attraction. Never considering myself a person who believed in the existence of "Love at first sight", but a true romantic deep at heart, I couldn't help but believe in it now. He is my walking proof of it!

Waiting for me in the hotel lobby was the very person I couldn't stop entertaining the thought of all day long, there he was looking ever so fine standing in front of me now. The whole entire world faded away and all that was left for the moment was this complete stranger I had only met last night but somehow captivated the very essence of my very heart. There was no need for me to try and act cool now. He already knew I was snagged hook, line and sinker. Smiling all the way up the many stories in the elevator up to my room he took notice of the posh décor of the hotel. "You should see where I'm staying, this is a royal palace compared to it" His first impression of me he automatically thought I was going to be a spoiled high-maintenance girl that had money coming in from a parents hefty trust fund. Casually he got to find out through many deep and meaningful conversations that my life's grim story wasn't that pretty at all. For some reason beyond my knowledge I had the need to tell this stranger almost everything.

Wanting to be judged and looked down upon for everything about my life that I knew was wrong and being the first time I had spoken about my years with Jeffrey to anyone honestly like that ever before, I had felt like I had deserved punishment. He offered me no judgment, instead only

gave me his warmth and compassion as he wrapped his strong arms around me, making me feel so meager and small but so safe at the same time. Encouraging me to see the worthiness of myself and leave that life behind, he adorned me with a kind love that I wasn't accustomed to.

He took me in and made me feel so at home. It was like I had known him my whole life. I couldn't bear to be without him another second while I was away on this dream holiday. When he wasn't training for Muay-Thai tournaments and I wasn't in school, nobody would ever see us. Too enveloped in each other in my hotel room to care about anything else. Which is why I asked him to come stay at my hotel with me, seeing he was never at his own anyways. My girlfriend was soon departing back to Wisconsin, making my room more than available for him. Enchanted by his words and tender touch, the way he made love to me was again like nothing I had experienced before. Even down to after sex as I had been routinely instructed by Jeffrey to get up for a warm washcloth to clean his genitals afterwards, he refused it, telling me I was no longer a slave and that he didn't want me acting like one. He'd just rather lay down together afterwards and repeat our sweet nothings with many adjoining kisses.

On our third night together with nothing but the bed sheets between us, we had spent all night looking into each other's eyes sharing such an undeniable passion for one another. In the deepest caverns of my heart I knew this man would give me what I had never experienced before... True love. We were still laying in each others arms when the orange and pink sunrise began to rise slowly through the peak's of my rooms windows, enticing me to come feel the freshness of the morning's chill. Only the bed sheets were still wrapped around my body as I went the balcony. It was overlooking the city in a valley surrounded by mountainous tops. My thoughts began to rampage through my head and I knew this could only be a dream for me. It was getting serious now, too serious for the life that I led back home. As if he sensed my anxiety Robbie walked up behind me and wrapped his strong arms around my waistline, gently kissing my neckline and pausing with his ever so thoughtful stares and gave me the exact opening that I needed to expel my thoughts. "Back home, as you already know, I am going back to someone else, it's my job, and as much as I really like you, this guy that I kind of see is going to expect me to be putting him first, I am so sorry to say all of this after such a wonderful few days we have spent together, but you need to know this thing happening between us can't get anymore serious than what we have for now. I am so sorry" I looked down to the floor with nothing else I could say to alter his perception of me now that I had told him the truth and it never dawned on me that thought he wouldn't be out the door before I could even finish my sentence but he

continued to surprise me with his efforts to make me believe we were more than just friends with a summer crush. "You see... your problem is that you don't see what I am looking at right here in front of me, a beautiful girl who is completely lost in a game that she has no control over. Get out of it now, take my hand and follow me back to my home in Australia." I heard what he had said but I found it hard to comprehend what he was actually talking about. "What?" I asked him with a look of confusion on my face. "Your nobody's property, you can do this. Marry me." His statements got more and more profound as he went on. Repeating the question he got on one knee and proposed again "Jenna, I am in love with you and want to spend the rest of my life making you happy. Please don't go back to him. I know that I am the only one for you and I will always treat you right. He paused for another second and repeated his question "Jenna, will you please marry me?" My hands fell into my face after that and without even letting myself think through the answer, I let my heart do all of the talking. Looking back up at him I said "Yes!" I almost shouted the answer at him, as if saying it louder would give the word more meaning. Wanting to believe him and everything that he was saying felt like a vacation from all of the suffering and loneliness that I had endured over a lifetime of abuse and degradation but knowing what you want and getting it are two different things that rarely went hand in hand...or so I thought. All I knew from the brief period I had known this stranger was that he was offering me a life and love down an unfamiliar path and it was a gamble to believe a complete stranger but somehow I knew he was right. My heart was beating so loud I thought it was going to jump right out of my chest. With the earnestly in my reply he picked me up in his strong arms and took me back to the bed and reiterated his words in a more physical sense this time. Never had I felt loved like this before, so swept off my feet and unable to even think, eat, or do anything for that matter which would involve leaving the hotel room without him.

Everyday after school would be my Robbie waiting to take me back to the hotel room for another night's passionate rendezvous, but a few nights after his proposal, he had another surprise in store. He didn't just want to get married someday. He wanted to get married now, this week even. I walked into the fabric store and was attended too by several seamstresses who were already be expecting my arrival. I was there to design and have fun designing my own dream wedding dress. While I was busy picking out fabrics and having measurements taken I would look away for a moment only to catch his tender eyes staring in my direction. Such adoration behind his looks...could it be real? I would often ponder it to myself just hoping for the gamble I was taking to work

out. I still had to believe in something better than what I was accustomed too and here he was right smack dab in front of me.

Giggling at all of the lace and frills they were trying to dress me up in, looking more like an antique porcelain doll than anything else I closed my eyes and pictured the day that I thought would never come, starting to imagine the kind of dress I would like to wear I envisioned a simple sleekness, a complimentary figure hugging gown with a small train but long enough to distinct it as an actual wedding dress. After we settled on what we were going to wear for the big day, we would next have to decide where we would hold the ceremony. Not before celebrating the entire week beforehand though. We started our honeymoon early celebrating every night spending our time between my hotel room and sending our heads spinning on the dance floor at many different clubs. Only with each other in sight, the dance floor was ours, we were out to give each other something to remember each night by. I whispered all of the things I couldn't wait to do him once we got back to the hotel room and watching him heat up on the dance floor I was never able to get enough of him driving me crazy. Like a thirst I was unable to quench, his lips were like a fountain of deep springs that I could never reach the bottom of.

Seven days, exactly a week after his proposal I sat on my bed in distress, contemplating what I would say to the man who I was about to call. There was no nice way to go about it. I couldn't last forever with him and this was my one chance to get out of it for good. I was leaving him, never to return to him ever again. I just had to go ahead and do it. Part of me was hoping he'd be at least a little happy for me and the sudden change in my life's direction but the other part of me knew I was already asking too much of him.

Calling his office in New York I was transferred to Jeffrey's personal office. He picked up the phone on the third ring, pausing before I could get any of the words to come out of my mouth but I mustered up my courage eventually and gave him my prepared spiel. Beginning with how much I had appreciated everything he has done for me up until this point. I hoped he would be understanding but he just wanted me to hurry up and get to the point. Trying to contagiously pass on my excitement through the phone lines, I finally screamed out "I'm getting married! Can you believe it?" No reply was given only a silence on the other end. Trying to make some conversation ridding the uncomfortable silence, I went on to tell him about Robbie and how I had fallen madly in love with him over the last amazing few days we'd spent together. The absence of sound made my thoughts begin to run wild and to get some response I had to ask him what he thought about everything I was telling him. Finally a few seconds later his reaction to the news sunk in and his only and final reply

until many years to come was "Have a good life!" With that statement he slammed down phone receiver. Leaving only an echo of the dial tone to answer back too. I was to paralyzed from the shocking response. "What have I just done?" was the first thing that entered my thoughts. Overwhelmed with guilt I felt like I was falling down a deep and dark hole and then the tears began to flood in. Here I was standing at the dawn of a new happy life for myself and I couldn't see past how bad I had let Jeffrey down not yet seeing the hold he had on me.

Like my knight on a white horse, in came my hero to soothe my somberness. He rushed over to the bed where I was beating myself up mentally and wiped the falling tears from my cheeks. "I take it that it didn't go so well...huh?" Sniffling through my sobs I managed to tell him that "It doesn't matter anymore all I care about is you and leaving all of that life behind me!" I wrapped my arms around him and he asked me in a half joking voice "Then why are you crying?" He got me almost laughing now too "I guess it's just so scary taking such a huge plunge away from what I'm used too and taking such a big move to another country. It's just all so different and I'm just trying to comprehend everything that is happening in such a short time." Always out to lift my spirits his next comments made me gush in laughter "You think that was a hard phone call wait until I call my Sicilian mother! Watch this, I know exactly what she'll say. First it'll be a saga about how I'm killing her with my selfish actions then it'll be about how she's going to kill herself for doing such a terrible job raising normal children. Don't worry though, she'll love every second of it. Wogs thrive off of the drama in their lives and off everybody else's for that matter!!" He was pretty much on the dot when he told me how she'd react to the news. In the end after relentlessly trying to change his mind, she sighed, "If it was going to be anybody to do something as crazy as this, Robbie, it would be you!" It wasn't a blessing as such but at least she wasn't threatening suicide any longer.

Calling the closest of our families the night before our wedding to share with them our announcement wasn't celebrated by any members of either sides but that didn't discern us one bit. My parents took it well, considering their only daughter was marrying a foreign man that they didn't know from the next guy on the street and too top it off I was moving to Australia, permanently. When I asked my Dad many years later why they hadn't put up a fight, he just simply replied that nobody expected it too last very long. Fair enough, I thought. I don't think anyone did at first...even us at our toughest times. We were a rare attribute these days in the numb era we have all been accustomed to living in, turning nothing into something, which I had also come to realize, was the most precious gift in life...Love.

Falling asleep was easy to do in his arms that night. I laid my head on top of his chest listening to the drum of his beating heart. I had never felt like I was more at home than ever before in my life. He pulled me gently in closer to him, letting me know that he was there for me even when the lights went out and the thoughts would usually creep in. Amazing how he knew what I needed without even asking for it. Wishing for something like this my whole life I thought I was being such a fool in so many ways, but I was so wrong. The way his pretty eyes looked at me with such an understanding and compassionate sincerity made me want to trust his words and believe the love that he was offering me was indeed real.

The next morning, Robbie was up and out of bed early to pick up our tailored wedding suits and dresses for our big day at Doi Cept Temple. His best friend from high school days that was travelling with him from Australia met him in the hotel lobby at seven o'clock. He was going to be joining us for the wedding as Robbie's best man. He still hadn't been able to find black shoes to go with the suit, so after he dropped off my dress back to me he was off again to try and find himself a pair of decent looking ones. Overjoyed with excitement I was thrilled from the second I kissed Robbie good-bye for the last time before we were officially married. Looking in the same mirror only a week ago I was now a different person, I felt like I was plunging into a bottomless abyss. Here I go, I thought to myself as I plunged out the door letting the butterflies in my stomach carry me all the way to my nearly husband.

I had to go to the beauticians that morning for my pre-wedding makeup and dressing. The ladies who were doing my hair and face at the salon did a great job making me feel so beautiful for my special occasion that every girl dreams about their whole entire life. Requesting simplicity at best, not wanting to go overboard with all of the wedding apparel they tied my long hair up into a knot wrapping around it a veil of flowers made up of baby's breath and small yellow and purple budding flowers. I couldn't have dreamt it up better myself and when I met my husband to be at the bottom of the mountain he stood before me speechless "You look so... beautiful!" were his first words that his mouth formed almost whispering them. He took my hand and we walked into the sky lift together. Behind us followed an interpreter that Robbie hired to translate the Buddhist Monks ceremony speech for us English only speakers and then his best friend, who only moments before gave him the best mans speech about being the last chance to walk away from this and not get married to a girl he hardly knew, but my Robbie wouldn't hear a word of it. He already made up his mind the instant he proposed and I said yes, "I was born to be with this girl," he told his best mate. "Alright then lets go do this then!" Once he knew Robbie was sure in his decision he was more than ecstatic for him. We were slowly lifted up the tremendous mountainside,

surrounded by the floral green carpet of mossy grass that covered the earthly skyscraper and falling fog, it was like being carried to heaven or the closest thing to it! Taking my eyes off the scenery and catching him adoringly staring at me again, I welled up with unstoppable tears. "I am so lucky, is this really happening?" He squeezed my hands and replied back "You're the only one for me...I love you!" relieving the anxiety written all over my tear stained face.

Chapter 22

Getting out of the carriage we were greeted by good fortune from the Gods above. A sun shower cascaded over us as we advanced into the ancient holy temple. My tears of joy dried and my happiness was glowing for all to see. The many visitors to the temple stopped and took photos of the passing bride and groom, no other foreigners had ever been married there and certainly anyone wearing traditional western wedding attire, such a sight had never been seen behind these religious walls, we became a permanent icon at the temple. The ceremony was done in the Buddhist customs according to their ancestral accordance, and translated for us in our own language. Both Robbie and I were anointed with a blessing from the monk with a splash of water and seven sacramental bracelets, each one representing another meaning to the longevity of our union together. We signed our names in the Buddhist wedding registry of Doi Cept Temple and officially became Mr. & Mrs. Roberts at least officially in our hearts knowing the laws of Australia only recognize certified weddings, meaning when we got back to his homeland we'd have to make a run for the courthouse. This was our real wedding though, perfect down to every detail. Walking up to the highest point of the temple to the balcony hanging over the edge of a cliff side over looking the city of Chang-Mai, we knew we had found the perfect spot to recite our vows of love to each other. Providing everything for me and more than I could ever ask for, his vows were to love me unconditionally until death do we part, shelter me from all the cruelty in the world that I was so accustomed too and to be like the bear, because the bear never forgets. Tears once again streamed down from my eyes as he made this moment unforgettable. Wiping the mascara fading underneath my eyelids whilst giggling at my embarrassment I took his hands back into mine again and gave him the vows that were the sacred prepared words from my heart. My ears were thundering the sound of a million horses hoofs descending downhill and my heart was beating so fast my words barely trembled out of my mouth when I began to tell him how much he had changed my

whole life around and how I would dedicate my entire being to loving him and only him until I blew my final breath.

I meant every word that I said to him, this was it for me, wanting nothing more out of life than to be with someone like him to raise a few kids together and grow old on the front porch letting the days fade us by. I know it probably sounds boring to most and it would've to me as well many years ago but after the life I had led, I had enough experience in the real world for my liking and now all I want to do is to enjoy the remaining days of my life for what it is...a simple and satisfying existence. Our day was so special but not only to us, even too the Monk that married us. Upon our descent down the lifts he asked if he could take a photo with the bride and groom in front of their symbolic liberty bell signifying the union between east and west. It represented a lot for us too, it was the commencement of a new life together and just the beginning of battling each other's past demons together.

Kissing the bridal party goodbye, who were just the local girls I had met on some of our many nights out of having fun. I threw my arranged bouquet of Thailand's white wedding florals mixed with colorful orchids to the screaming Thai women behind me and we were given one last tradition to take with us, the release of caged doves. It was such an incredible gesture, especially for me. Symbolizing their freedom as well as mine I opened the cage's door to let them free to decide our own fates. As the wings on the birds began to spread open and they took their final decent into the blue skies granting themselves freedom I knew mine had finally come too. The relevance of watching them fly away and how I had perceived my own day of marriage related to the identical feeling of fleeing an entrapment of my own kind. I was liberated from the bounds of slavery I had come to know over the many years I had spent with my fair share of greedy perverted old men only to have serendipity mend my scars with the powerful healing of what true love has to endeavor on.

As customary in the romance novels I had read as a young girl he picked me up in the hallway before our hotel suite and carried me over the threshold, poufy dress and all. My arms were tightly squeezed around his neck never once taking my eyes off of him until he revealed yet another sweet surprise. Besides the cleaners tidying up my room while we were gone they were also given instructions by none other than the groom himself to pick the petals off the stems of red roses to place on our bed in the shape of a giant heart. The rose petals led the way to where we consummated our love physically and it was undeniably the first time in my life I had really ever been made love too. Hours had passed by before we thought about anything else besides one another's words of arousal, tantalizing touches, and lingering kisses. We ate a quiet dinner at a local restaurant and went straight back to the arms of each other again, so

profoundly in love with one another it was the ideal display of what the "honeymoon period" should have to show for. It was crazy, young and energetic, just what it should be between two blossoming lovers.

The following morning we left the Princess Hotel, no longer under any of Jeffrey's financial privileges or control so to speak, continuing our love spree in another dwelling of our own accord. Three days later when we finally showed our face for the first time since checking in downstairs in the new hotel lobby, besides to request fresh sheets and towels, the entire staff of the hotel had a good laugh at our expenditure, from their reaction it must've been nice to see a couple so affectionately fond of each other.

Now we wanted to have another type of fun, Robbie had visited a tourist agent by himself before we got hitched to book a honeymoon itinerary for us to explore Thailand and beyond together, another surprise he had in store for me. We left early in the morning and joined the crowded bus for our journey beyond the border of Thailand to a village in the war torn nation of Laos. When we got through the extremely armored visa office eight hours off the beaten path, we then had to cross a flooding river from a recent heavy downpour of rain in a slim banana boat that looked like it could barely handle our weight let alone the excess of my luggage that Robbie was so kind to trek around the world for me.

Unbelievably we did make it to the other side only to find that my honeymoon in the tropics wasn't exactly how it had been explained to me. Naked children ran through the dirty streets, with one boy that decided to release his bladder on the pathway where we were walking as we passed by him on the way to our hotel. My doubts of his choice in destinations became apparent after that sight. Robbie was getting hungry after we hadn't eaten the entire duration of the trip and being such a rugged man he could digest just about anything. Deciding to stop on the side of the road he ordered some kind of seafood dish...daring I thought, settling for some toast and jam, something safer I thought. Then I saw the lady behind the counter dip some plates in a dirty bucket full of dirty water and then rinse in another bucket of water that didn't look as bad as the previous mud drenched one and then further proceeded to put my toast and his food on top of them serving it to us all in a clear view. I just couldn't bring myself to even fathom it "I can't eat that!" I mouthed in a hushed voice trying to quietly make my point clear but was made public with his loud mouth outburst of "Why not? Looks fine to me. You have to try and eat something, you haven't eaten all day!" I know it was just his caring side that was trying to force me and to top it off he is Sicilian and they're all about eating so it was our first debate and now we were officially married with many more marital conflicts to subsequently follow. Two head strong and stubborn people both with the right

intentions but still recovering from old wounds. It was only natural and important that we fought just as much as we made passionate love together. Countlessly proving to one another the true intentions of each other loves but sometimes in not so seemingly actions.

Finally arriving at the hotel it was like a scene out of a horror flick. We were showed up to the room that looked like someone had been brutally killed in. The bed sheets were torn apart and the bed was stained with blood from some poor helpless victim. Nearly vomiting at the pure sight of the room and the stench that accompanied it, I was now tearing at the thought of even staying here for a single moment longer. "No way!" I told my new husband and from the tone in my voice he knew I was serious. Not that I was not denying the fact I have never been an outback type of girl. I was fine with that impression, I am no snob but give me the simple luxuries of a clean bed and a shower then I'll make myself at home, but this was just the epitome of filth and even possibly an act of a horrendous event but who knows, the lady who showed us to the room seemed fine with it passing it off as a hooker on her period. In some ways that was even worse..."Yuk...Okay Robbie it's time to go...now!" we were heading back down hill back to the passport center declaring our passage back into Thailand. Considering us a risk due to the short time we spent crossing the border and back, the officials held us at gunpoint while others rummaged through our luggage for drugs or whatnot. Finding nothing of course they released us and stamped our passports, making us good for another three months if we wanted. We were thankful for escaping with our lives alone, although we had nothing to hide but still an endearing experience nonetheless in the first days of our honeymoon of all days.

Chapter 23

Arriving in Koh Samui for finally a bit of relaxation in the tropics, it was my idea of how a holiday should be, sunny warm, and clean... well, clean enough. We lived it up like kings for the next six weeks. Making it an ideal way for two strangers to properly get acquainted. Dancing into the wee hours of the night and making love in the blistering heat of the sunny days we discovered everything on that island... mostly being each other. We made friends of all sorts, mostly travelers, but everyone the same in being taken aback by our fairytale romance. With our captivated eyes never straying too far from one another anyone could easily see the strong chemistry between us.

Trying to find the woman in me wasn't difficult, as I took to the bounds of marriage with such ease, no longer a girl I loved the idea of being a

wife and belonging to a husband like Robbie. Marriage was bliss for the duration of our honeymoon until we had to ride coach on our way to Bangkok Airport to fly out to Australia. Chatting away with always so much to say to each other we watched a movie and finally got comfortable leaning up against each other as pillows. We both fell asleep on the long ride and when we woke up to the sound of the buses brakes coming to a halt we initially realized my purse and Robbie's wallet with all of our money and cards in it was missing. Stranded in the city of Bangkok was frightening enough as it was but too make matters worse a lady looking in her mid-seventies, scrawny and hunched over from an obvious lack of nutrition lifted up her skirt to a passer-by with a she-male hanging off his arm and began smacking her vagina blaring out "Look! No cock...Pussy, pussy! Only five baht" repeating herself many times over the man just walked on past as she sat back down on the curb waiting for the next alluring customer. Robbie and I shook our heads in disgust and disbelief, things could really be that bad for someone, I would know best as it wasn't far off the life Jeffrey had been training me up for.

Completely broke at two o'clock in the morning and with no one to call for help, I panicked right away. Robbie rubbed my back and his tired eyes trying to make the situation better. Luckily we had made friends with some really nice people from the resort on the island who gave us about two thousand baht when they saw how devastated Robbie and I were. With just enough money to rent a really cheap room for the night at a backpackers hostel and pay for a taxi to the airport the following day, we were saved.

Early the next morning we were off in separate planes, since Robbie's ticket was pre-booked and no available seats left for me to join him meant we would be landing in Australia separately. Fortunately we had found a corresponding flight that arrived within the same hour of each other but I would have to make a stop over to the Philippines. The lengthy hours of the duration on the flight seemed to stretch on with only the thoughts of the journey ahead of me I couldn't wait to get back to my husbands loving arms. The trip was going well, sleeping the majority of the flight until I had to change planes in the Philippines.

After the plane landed and before any passenger was allowed to get off we were handed a declaration statement that informed us that if we were carrying any drugs or weaponry, we would be arrested and face charges with death as the ultimate penalty. Not that I had anything to worry about, but what a thought to willingly sign over your life. I got the chills handing over my signed declaration and traveling documents to the customs officer. Obtaining my passport he additionally asked to see my departing ticket. No problem I thought, just I had done many of times, and I handed over the requested information. The officer looked me over

and got on the phone immediately which sounded like a phone call to his superiors but I couldn't tell since it was in another language. A brief conversation but long enough to get me thinking, he then called over two guards who took me by the arms and brought me into an empty room but for a desk and three chairs to be interrogated. No one would tell me what was going on they all just scattered around in frenzy, ignoring all of my hysterical inquisitions. Leaving me by myself and alone with my thoughts I couldn't help but panic even worse now.

This was a total bombshell of confusion on my part, what had I done wrong? Minute's later a large-framed woman in a green uniform entered the room with the guards from before and sat down across from me with a stern look in her eyes. She placed my documents on the desk in between us. Not saying a word to me she was waiting for me to give her an explanation for something. "Can you please tell me what this is about, have I done something wrong?" I asked her politely, trying to restrain any animosity towards her. Her reply sounded as grim as she looked. "You have been in Thailand for three months and now you have only a one way ticket booked to Australia with no visa. What exactly are your plans once you get there, Ms. Roberts?" To myself I wondered what business it was to her, don't people travel with one-way tickets all the time? Knowing I was in no position to be able to say anything like that or even at all I just gave in nicely and told her my intentions to travel over there. Crying through my entire explanation I wasn't sure if I was going to even make my flight now. She had to think about everything I had told her for a moment, deciding whether or not she would grant me permission to meet my husband in Australia or send me back alone to Bangkok. With only time on my side she had to make a hasty verdict now. One more question had to be answered before I was let go, she wanted some proof. "If you have just got married can you show me your marriage certificate then?" This didn't help my stories credibility at all seeing that we were married in a Buddhist temple and given woven bracelets instead of certificates. Explaining to her that I didn't have one to show her yet but was already aware that I would have to obtain a legal marriage certificate through a courthouse upon my arrival in Australia to stay there legally, it was only because of my husbands beliefs we wanted to get married in a Buddhist ceremony. She must have shared a common interest in religion or something like that as she finally cracked a smile upon the photos of the wedding day that I showed her and carrying in my purse since getting them developed, if she wanted proof, well this is all I really had.

Handing me back my documents and ticket I was now free to leave but she wasn't leaving me much time to run through the airports terminal to get to my departing plane. Expeditionously bolting through the busy airport

my adrenaline was still pumping from the previous encounter with the officials of the Philippines who had enough power to condemn me if they had felt like it. I caught my plane in the nick of time and once I was settled in my seat my thoughts went back to my dear Robbie and how much I was missing him. I was just relieved that I was on my way to be back with him again soon.

Looking out the window I could see the red earth beneath me. As I landed for the last time I took notice of the first steps I walked off the plane and onto a new soil for the first time. I had so much to be looking forward too in my new homeland. In my heart I knew this was all I ever wanted, this was going to be my haven. There was another surprise in store for me when two elder strangers walked up to me and asked my name. "Are you Jenna?" Nodding at their question they gave me their first names and wrapped their arms around my neck. My new mother-in-law then said, "We are Robbie's parents. We wanted to be the first ones who welcomed you to Australia and into our family" It was my in-laws meeting me for the first time. Handing me some balloons and flowers they even had gifts for their new daughter-in law. While waiting for Robbie's plane to arrive we all chatted about many things like the flight over from Thailand and the scare at the previous airport in the Philippines. I asked them how they knew whom to look for? My father in law laughed, saying recognizing me was easy from Robbie's detailed description. He told them to look out for a petite, young blonde carrying an abundance of luggage. Laughing together over a few more brief conversations of getting to know each other better they seemed relieved to finally meet me compared how stressed she sounded in the conversations I overheard Robbie having with her while in Thailand.

Watching the arrivals board I knew Robbie's plane had landed ages ago but was just waiting for him to get out of customs. It didn't bother me anyhow, I was enjoying get accompanied with his parents for the first time. Eventually I saw my husband walking down the runway behind the gates, I just couldn't wait a second longer. I ducked underneath the gates and ran all the way up the runway to jump excitedly into his arms. I wrapped my arms and legs around him holding onto him for dear life. I just missed him so much I knew I would never let him go, theoretically speaking that is, and I never have nearly a decade later.

Chapter 24

Over the near decade we spent together, Robbie and I have shared the common highs and lows that every determined marriage endures. It has

taken a lot of hard work and doesn't come without its flaws but no matter what it is just perfect for the two of us. He helped me how to remember to smile again and life has slowly began to sort itself out. They say that time heals all wounds but what I had experienced in my young years wasn't nearly long enough to let all of the hurt go. Seeking help through many counselors and psychiatrists I was doing everything I could do to deal with the scars and all of the pain left behind. Completely off of any pharmaceuticals, since the last day of our honeymoon, and healing my heart with love instead of hate our marriage is my foundation and Robbie is my solid rock. We have to be for one another, putting the bonds of our union through the wringers and back, as neither of us expected my past life eventually to come back and haunt me after so long.

Our blissful life came to a sudden halt one day when we were out visiting my in-laws at their nearby house on just another plain afternoon. There was a knock on the front door and my father in law got up from watching TV on the couch to answer it. He rushed back quickly coming into the dining room, where I was feeding my nineteen months and five month old boys at the table, and he blurted out, "Jenna there are three police officer's at the door asking for you by the name of Virginia Roberts!" I asked my mother in law to stay with the babies to find out what this was all about. I didn't even think it had anything to do with Jeffrey at first and wasn't even worried when I opened the door to offer them to come inside to talk.

They weren't actually police officers and two federal agents of Australia with one F.B.I agent from America. The American agent asked if I wouldn't mind actually coming outside so that I may speak with them in private. "Okay" I said, as well as mentally preparing myself for something big from the look of it, it's not over a parking ticket or anything small that you get three federal agents knocking at your in-laws front door asking to speak in private. "Can we first ask you if you are in fact Ms. Virginia Roberts and originally from Palm Beach County in the United States?" I confirmed my name and previous state of residence then they even asked, "May we see some identification please?" A different agent asked the question this time and I told him "I will have to go and grab it, my purse is inside. I'll just be one second."

Robbie was standing on the other side of the door trying to figure out what they were doing here talking to me and when I rushed through it to grab my purse and saw him standing there looking puzzled, I told him I had no idea what this was about yet, but not too worry everything was going too be just fine. Taking a deep breath and slowly exhaling outwards, I opened the door to find out exactly what the agents wanted to talk about.

Pulling out my Australian drivers license from my wallet, I was going to hand it over to them but they were sufficed at a quick glance. There was no meet and greet, they went straight to the point. One agent picked up a briefcase off the porch floor and opened it up taking out a stapled stack of paper. Then that same agent asked me if I had ever known an affiliate by the name of Mr. Jeffrey Epstein. All of the sudden my stomach tangled in a familiar knot that I hadn't felt in many years from a past life that I was trying to forget about. I nodded in affirmation of their question and said "It was a long time ago and he's no longer an affiliate of mine, but yes, I did know him once." It was shameful enough to think about let alone talk about with them for the first time since I had started my entire life over. His next response left me nothing short of speechless. The United States Attorney's Office for the district of Florida was giving me a notification of being an identified victim. Jeffrey was finally caught for his atrocious acts of perversion on girls who were barely old enough to even comprehend "the birds and the bees" so to speak.

On June 30th 2008, Jeffrey Epstein pleaded guilty for procurement of minors to engage in and solicitation of prostitution. More than a dozen girls had been named as victims of Jeffrey's federal offense's and without ever stepping a day in court he was granted a plea bargain consenting to charges that named him a registered pedophile for only two of the minor girls. Getting away with even serving only twelve of the sentenced eighteen months behind bars be that in the evening alone and in the morning he was released during the day. Restricted to the confinement of his lavish mansion in Palm Beach only to be with his original sex slaves from over ten years ago, Nadia Marcinkova and Sarah Kellen, and knowing Jeffrey all too well, they wouldn't be the only ones there while he was pulling his laughing stint of retribution. Even at nighttime the girls were still allowed to visit him, accounting to nearly seventy times while serving his time in incarceration.

No justice had been served for any of us victims. Denied the very constitutional rights allegedly there to protect and serve us. We weren't allowed to have a voice in front of a jury and judge or even informed for that matter. Instead we were handed this notification of being a victim but told we were all too late to do anything about. To make matters worse part of that plea bargain was that we had the option to sue him with the lawyers he provided for us, and conveniently enough I found out later they were also his lawyer's old friends from the college days.

I felt my knees go weak and the anxiety churning in my stomach was now making me feel sick. Taking the bundle of paperwork from the agent who was now handing it to over me, I had to excuse myself before my legs actually buckled. Closing the door behind me I couldn't even find the words to tell my husband what was going on. I rushed to the back of

the house and went out to the back yard where I wanted a minute to compose myself and process the information I had just been told. Robbie followed behind me but the stillness in my eyes convinced him to give me that moment to compile my emotions.

A few moments later and I was ready to talk. Collapsing into his arms with such anguish, he just held me until my sobs subsided and I was able to tell him what actually happened. Starting with an apology, I began to tell him how I was so sorry but my troubled past has come back to plague our simply sweet lives and was just about to turn it all upside down. He was so understanding from the beginning of all this, telling me that he will always be behind every choice that I make in mending the sorrows of my tormenting past and there he has been through all of the thick and thins.

Deciding to call the lawyers on the victim suit provided for me was a big decision but one I had to do to seek the unanswered questions from my battered heart. The two women at the firm that I spoke to treated me so wonderfully, like long term friends they counseled me not only in the terms of a lawsuit towards Jeffrey but also in the matters of being emotionally and sexually abused. I chose to proceed with the lawsuit at least to make a statement to a man that tried to make a degrading statement about me so long ago. Now it was my turn, I had the choice to turn the tables on him hoping he would feel embarrassed and in the spotlight for everyone's entertainment where he had kept me for so many years.

Winning my lawsuit against him was not enough to heal old wounds, I never got the chance to stand up in front of a jury and tell them how much pain I had endured and still endure throughout the many nightmares I face when darkness hits and the silence of the sleeping household fills my head with pictures of reliving my past with him or the others he sent me too. Or did I even get to hear him confess his guilt and suffer the way I did locked in confinement for many years? No, instead I got to see a picture of Jeffrey with his arms around a very youthful looking teenager, if even that, parading the streets of New York, the very way he had with me and so many other girls long before.

As if it were a public display intended for not only his many victims to see but also a spectacle for the public justice system, it was bold show of insolence laughing in our faces while we all sat by not being able to do anything to help these young girls from the streets still suffering his perverted afflictions. Not much longer there was another story on Jeffrey I saw in the papers of him and Prince Andrew having a stroll together in Central Park. It instantly sparked my concerns for other girls in the very same position I was in so long ago and he was obviously up to the same old tricks, I had to do something now. Not being able to sit by any longer

with the knowledge of being able to help out in some way. I had to tell my story no matter how shameful it was to even speak about. Putting my shame aside I had to derive every bit of courage I could sustain and now I am ready to tell it. The hardest lesson I had failed at learning until later on in my life became my strength, the belief in my inner voice and the ability to speak up. I do have a voice and now the world is going to hear it in my whispered cries for justice. Swept away by a surge of media with one phone call I sent Jeffrey's publicist into frenzy. Not to mention the release of the photos showing the first night that Prince Andrew and I shared together that I so happened to unveil for the public to see.

I spent too much of my life going out of my mind waiting for the rescue that never came until it was too late and then the scars were already imbedded deeply within. Thankfully I am now free from the struggles that nearly destroyed the love inside of my heart. I only wish it could be the same for the other victims, not just of Jeffrey's inflictions but every person who has ever suffered at the hands of another.

I'm here to tell you from my own experience that the moon is yours if that's what you want, all you have to do is stand up and take it. If some girl off the streets of Florida, like me, can stand up against the tyrants that run the deep pockets of our world, than anyone can. Just like I needed to believe that someone stood up for me once like Robbie did long ago, I now stand up for us. For all of us girls, the ones who are still on the streets and think they don't deserve better or it's an unachievable dream to be entitled to more out of life. For all of the beautiful girls who don't see beyond they're outside appearance. For all the girls still trapped in enslavement and unable to get out of the abuse that holds them down. But most of all, I stand up for every girls belief in love, because it is the very savior of my spirit and soul.

The End

Written and Illustrated by Virginia Roberts

EXHIBIT LL

ARTICLES OF INCORPORATION

In compliance with Chapter 617, F.S., (Not for Profit)

ARTICLE I NAMEThe name of the corporation shall be: Victims Refuse Silence, Inc.**ARTICLE II PRINCIPAL OFFICE**Principal street address:
425 North Andrews Ave.

Mailing address, if different is:

Suite 2Fort Lauderdale, FL 33301**ARTICLE III PURPOSE**

The purpose for which the corporation is organized is: Victims Refuse Silence, Inc. is organized exclusively for charitable and educational purposes including, for such purposes, the making of distributions to organizations that qualify as exempt organizations under section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code. The corporation is organized to provide assistance to victims of sexual abuse as well as victims of human trafficking.

Upon the dissolution of Victims Refuse Silence, Inc., assets shall be distributed for one or more exempt purpose within the meaning of section 501(c)(3) of the Internal Revenue Code, or corresponding section of any future federal tax code, or shall be distributed to the federal government, or to a state or local government, for a public purpose.

ARTICLE IV MANNER OF ELECTION

The manner in which the directors are elected and appointed: The manner in which the directors are elected or appointed is provided in the bylaws of the Corporation.

ARTICLE V INITIAL OFFICERS AND/OR DIRECTORSName and Title: Virginia Roberts, DirectorAddress: 425 North Andrews Ave.Suite 2Fort Lauderdale, FL 33301Name and Title: Bradley J. Edwards, DirectorAddress: 425 North Andrews Ave.Suite 2Fort Lauderdale, FL 33301Name and Title: Brittany N. Henderson, DirectorAddress: 425 North Andrews Ave.Suite 2Fort Lauderdale, FL 33301

14 DEC 23 PM 12:25
FILED
CLERK OF DISTRICT COURT
NORTH DARIEN, FLORIDA

FILED

Name and Title: _____ Name and Title: _____


Address: _____ Address: _____

Name and Title: _____ Name and Title: _____

Address: _____ Address: _____

ARTICLE VI REGISTERED AGENTThe name and Florida street address (P.O. Box NOT acceptable) of the registered agent is:Name: Bradley J. EdwardsAddress: 425 North Andrews Ave., Suite 2Fort Lauderdale, FL 33301FILED
14 DEC 23 PM 12:25
SECRETARY OF STATE
TALLAHASSEE, FLORIDA**ARTICLE VII INCORPORATOR**The name and address of the Incorporator is:Name: Brittany N. HendersonAddress: 425 North Andrews Ave., Suite 2Fort Lauderdale, FL 33301

Having been named as registered agent to accept service of process for the above stated corporation at the place designated in this certificate, I am familiar with and accept the appointment as registered agent and agree to act in this capacity

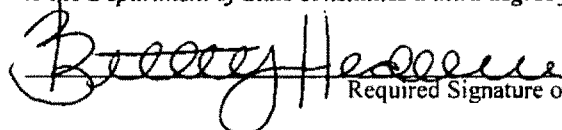


Required Signature of Registered Agent

12-17-14

Date

I submit this document and affirm that the facts stated herein are true. I am aware that any false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S.



Required Signature of Incorporator

12/17/14

Date

2015 FLORIDA NOT FOR PROFIT CORPORATION AMENDED ANNUAL
REPORT

FILED

Apr 22, 2015

Secretary of State

CC7801725405

DOCUMENT# N14000011657

Entity Name: VICTIMS REFUSE SILENCE, INC.**Current Principal Place of Business:**425 NORTH ANDREWS AVE., SUITE 2
FORT LAUDERDALE, FL 33301**Current Mailing Address:**425 NORTH ANDREWS AVE., SUITE 2
FORT LAUDERDALE, FL 33301**FEI Number: 47-2627774****Certificate of Status Desired: Yes****Name and Address of Current Registered Agent:**EDWARDS, BRADLEY J
425 NORTH ANDREWS AVE., SUITE 2
FORT LAUDERDALE, FL 33301 US*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.***SIGNATURE:**

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title PRESIDENT, DIRECTOR

Name GIUFFRE, VIRGINIA L

Address 425 NORTH ANDREWS AVE., SUITE 2

City-State-Zip: FORT LAUDERDALE FL 33301

Title VP, DIRECTOR

Name GARVIN, MARGARET A

Address 425 NORTH ANDREWS AVE., SUITE 2

City-State-Zip: FORT LAUDERDALE FL 33301

Title SECRETARY, DIRECTOR

Name HENDERSON, BRITTANY N

Address 425 NORTH ANDREWS AVE., SUITE 2

City-State-Zip: FORT LAUDERDALE FL 33301

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: BRITTANY N HENDERSON**DIRECTOR****04/22/2015**

Electronic Signature of Signing Officer/Director Detail

Date

EXHIBIT MM

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO: 15-cv-07433-RWS

VIRGINIA L. GIUFFRE,
Plaintiff.

-vs-

GHISLAINE MAXWELL,
Defendant.

_____/

425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Thursday, September 8, 2016
8:53 a.m. - 10:30 a.m.

VIDEOTAPED DEPOSITION OF BRITTANY HENDERSON

Taken before Rinat Katz, Reporter, a Notary
Public for the State of Florida at Large, pursuant
to Notice of Taking Deposition filed in the above-
styled cause.

1 APPEARANCES:

2 On Behalf of the Plaintiff:

3 BOEIS, SCHILLER & FLEXNER, P.A.

401 East Las Olas Boulevard, Suite 1200

4 Fort Lauderdale, Florida 33301

Smccawley@bsfllp.com

5 BY: SIGRID MCCAWLEY, ESQUIRE

6 On Behalf of the Plaintiff and Victims Refuse
Silence, Inc.:

7

FARMER JAFFE WEISSING EDWARDS FISTO LEHRMAN

8 425 North Andrews Avenue, Suite 2

Fort Lauderdale, Florida 33301

9 (954) 524-2820

Brad@pathtojustice.com

10 BY: BRADLEY J. EDWARDS, ESQUIRE

11 On Behalf of the Defendant:

12 HADDON, MORGAN & FOREMAN

150 East 10th Avenue

13 Denver, Colorado 80203

(303) 831-7364

14 Jpagliuca@hmflaw.com

BY: JEFFREY PAGLIUCA, ESQUIRE

15

Also Present:

16

Ryan Kick, Videographer

17

18

19

20

21

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|---|--|--|------|
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18 (Exhibits Retained by the Court Reporter)

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21

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25

1 she has continued to try and promote Victims Refuse
2 Silence at every possible chance she gets with -- the
3 story she told me was that someone had come to her
4 door, knocked on the door, selling something or talking
5 about something totally different, and she explained
6 what our mission was and tried to get them to, then, go
7 and spread the word for victims of human trafficking,
8 as well.

9 Q And this would be in Australia this
10 conversation occurred?

11 A Correct.

12 Q Okay. To your knowledge, is VRS incorporated
13 in any fashion in the country of Australia?

14 A It is not.

15 Q To your knowledge, does VRS have any website
16 presence in Australia?

17 A I believe that the internet works everywhere,
18 so I would say yes, because, if you Google Victims
19 Refuse Silence, we do have a website. So I would
20 imagine that that's something that would come up in
21 Australia.

22 Q Okay. Other than the somebody knocking at
23 her door, that conversation, did she report to you
24 anything else that she has done on behalf of Victims
25 Refuse Silence in the last year, let's say?

1 MR. EDWARDS: Objection --

2 THE WITNESS: During this telephone
3 conversation --

4 BY MR. PAGLIUCA:

5 Q Yes.

6 A -- or in general?

7 Q During this telephone conversation?

8 A She did explain that, when she goes to her
9 kids' schools and when she is out, she tries to promote
10 the organization, as well, and just talk to people, and
11 general awareness and understanding to raise -- for
12 issues of human trafficking, yes.

13 Q And did she report anything else to you
14 during this phone conversation?

15 A During this particular conversation?

16 Q Yes.

17 A No.

18 Q Okay. Then, you indicated that you reviewed
19 your file for all the paperwork, and we'll talk about
20 the documents produced in this case in a moment.

21 Can you tell me, other than what has been
22 produced as part of the response to subpoena issued to
23 VRS, what other documents are in the file that you
24 reviewed?

25 A I have saved every piece of mail that has

1 "publication," would be the Facebook page; correct?

2 A In addition to the website, yes.

3 Q Okay. Number 11, documents relating to all
4 appearances. As I understand it, there are no
5 documents that exist that comply with this request;
6 correct?

7 A Correct; to my knowledge.

8 Q Do you know, has anybody on behalf of VRS
9 made a public appearance on behalf of VRS?

10 A I believe that there was a scheduled
11 appearance, yes, one.

12 Q And when was that?

13 A I honestly don't know when that took place.
14 I would imagine in the beginning of 2015.

15 Q And do you know who was scheduled to appear
16 in the beginning of 2015?

17 A Ms. Giuffre.

18 Q And do you know where she was scheduled to
19 appear?

20 A I believe in New York with ABC.

21 Q And that would have also been with Mr.
22 Edwards and Ms. McCawley; is that correct?

23 A I believe so, yes.

24 Q And in fact, she did go to ABC and give a
25 taped interview, correct?

1 MS. MCCAWLEY: Objection.

2 THE WITNESS: It's my understanding, yes.

3 BY MR. PAGLIUCA:

4 Q Okay. Is it your understanding that that was
5 on behalf of VRS?

6 A I do not believe her appearance there was
7 made on behalf of VRS, but I do believe that -- I know
8 that she wanted to promote the charity, so that we
9 could start helping people and that she could start
10 getting her mission out to the public.

11 Q Okay. Number 12, all contacts received by
12 VRS through its website, or otherwise, to schedule -- I
13 think it should say "an event," and "and event."

14 There are none of those, as I understand it?

15 A No, that is not correct. We produced a --
16 yes, we did produce something to you. I'm not sure
17 what the Bates Stamp number is, but it was a contact
18 received by another victim of sexual assault who had
19 reached out to the organization.

20 Q An email, I think it's in December of 2015,
21 maybe; is that what you're referring to?

22 A I believe -- I'm not sure of the date. I
23 guess.

24 Q We'll look at it. And that would be the only
25 contact received by VRS; is that correct?

1 C E R T I F I C A T E O F O A T H

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3 STATE OF FLORIDA

4 COUNTY OF BROWARD

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7 I, Rinat Katz, Reporter, Notary Public, State
8 of Florida, certify that BRITTANY HENDERSON
9 personally appeared before me on the 8th day of
10 September, 2016, and was duly sworn.

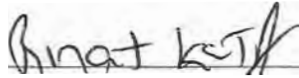
11

12 Signed this 22nd day of September, 2016.

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Rinat Katz, Reporter

16

Notary Public, State of Florida

Commission No.: FF4576

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Commission Expires: 04-03-2017

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1 CERTIFICATE OF REPORTER

2

3 STATE OF FLORIDA

4 COUNTY OF BROWARD

5

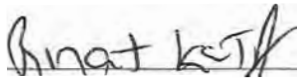
6 I, Rinat Katz, Reporter, certify that I was
7 authorized to and did report the deposition of
8 BRITTANY HENDERSON, that a review of the
9 transcript was requested; and that the transcript
10 is a true and correct record of my stenographic
11 notes.

12 I further certify that I am not a relative,
13 employee, attorney, or counsel of any of the
14 parties, nor am I a relative or employee of any of
15 the parties' attorneys or counsel connected with
16 the action, nor am I financially interested in the
17 action.

18 Dated this 22nd day of September, 2016.

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Rinat Katz, Reporter

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