

AFFIDAVIT OF BRADLEY JAMES EDWARDS

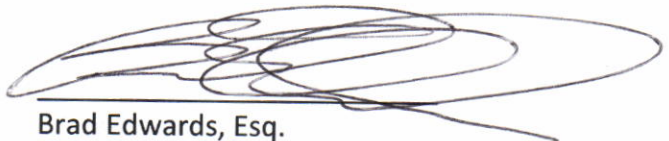
1. I am an attorney in good standing with the Florida Bar and admitted to practice in the Southern District of Florida.
2. The law firm of Farmer Jaffe Weissing Edwards Fistos and Lehrman, of which I am a partner, filed a recent lawsuit on September 17, 2010 against Jeffrey Epstein, case number 10-81111, in federal Court in the Southern District of Florida.
3. Defendant Epstein is a registered sex offender as a result of his pleading guilty to felonies related to his illegal sexual conduct with minor children.
4. Through discovery in other cases, I learned that Ghislaine Maxwell and Jean Luc Brunel were close friends and business associates of Mr. Epstein who had important and relevant information concerning Mr. Epstein.
5. Both Ms. Maxwell and Mr. Brunel avoided having their depositions taken by relaying false information that they were out of the country with no intentions of returning.
6. Ms. Maxwell relayed through counsel that, just before her scheduled deposition, her mother became deathly ill, and Ms. Maxwell was therefore going to be with her mother outside the United States with no intention of returning.
7. She was photographed a month later in the United States attending Chelsea Clinton's wedding and that photograph was captured in US Weekly magazine.
8. According to widely circulated press reports, including a 60 minutes documentary and Ian Halperin's book "Bad and Beautiful: Inside the Dazzling and Deadly World of Supermodels", Mr. Brunel has been known as a drug abuser that has molested children through his modeling agencies.
9. Mr. Brunel frequently stayed at Epstein's house as a house guest and also has reported his primary address at an apartment building in New York at 301 East 66th Street, an apartment that is believed to be owned by Mr. Epstein.
10. Mr. Brunel visited Mr. Epstein approximately 67 times while Mr. Epstein was in jail serving his jail sentence for his sexual crimes in Palm Beach County.
11. Mr. Brunel was set for deposition and avoided his deposition by providing information through his counsel that he was out of the country with no intention of ever returning to the United States.
12. When Mr. Brunel relayed the information that he was out of the country with no plans to return, he was actually staying with Mr. Epstein at Mr. Epstein's according to Mr. Epstein's probation logs.
13. During discovery it was nearly impossible to take the deposition of someone that could provide relevant information against Mr. Epstein that was not represented by an attorney being paid by Mr. Epstein.
14. It was learned that in addition to paying for his own counsel, Mr. Epstein also paid for counsel for the following other material witnesses: Sarah Kellen (Epstein's executive assistant and procurer of girls for him to abuse), Larry Visoski (Epstein's personal pilot), Dave Rogers (Epstein's personal pilot), Larry Harrison (Epstein's personal pilot), Louella Rabuyo (Epstein's housekeeper), Nadia Marcinkova (Epstein's live-in sex slave), Ghislaine Maxwell (manager of Epstein's affairs and businesses), Mark Epstein (Epstein's brother), and Janusz Banasiak (Epstein's house manager).

15. In this case of MJ v. Jeffrey Epstein, case 10-81111, I contacted Mr. Epstein's counsel, Mr. Knight to request that he accept service for his client and he declined.
16. My law firm was then forced to retain the services of Thomas Marsigliano, a private investigator in New York, to serve Mr. Epstein.
17. My law firm has been forced to spend more than \$1,400.00, on the service of process in this case to date.
18. In a previous civil case against Jeffrey Epstein that I litigated on behalf of my client, Jane Doe, case number 08-80893, Mr. Epstein invoked his 5th amendment right against self-incrimination on nearly all discovery requests as well as all relevant questions posed to him and his co-conspirators in deposition.
19. One piece of "evidence" that Mr. Epstein was ordered to produce included correspondence between him and his lawyers and the United States government.
20. Mr. Epstein alleged to have produced all correspondence from the U.S. government to him or his attorneys but did not produce that correspondence from him or his attorneys to the government.
21. I recently learned that there exists additional correspondence between Mr. Epstein or his attorneys and the United States government that was not produced for some unknown reason.
22. Specifically, I learned that there exists correspondence between Epstein attorney Lilly Ann Sanchez and former United States prosecutor Matthew Menchel as well as between Epstein attorney Ken Starr and various government attorneys and/or supervisors.

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

FURTHER AFFIANT SAYETH NAUGHT.

Dated this 11th day of November, 2010.


Brad Edwards, Esq.

The foregoing instrument was acknowledged before me this 11th day of November, 2010 by BRAD EDWARDS, who is personally known to me.


NOTARY PUBLIC

Print Name: _____

My Commission Expires:

