

EXHIBIT I

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT, IN
AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and PAUL G.
CASSELL,

Plaintiff,

vs.

ALAN M. DERSHOWITZ,

Defendant.

DECLARATION OF VIRGINIA GIUFFRE

1. My name is Virginia Giuffre and I was born in August, 1983.

2. I am currently 31 years old.

3. I grew up in Palm Beach, Florida. When I was little, I loved animals and wanted to be a veterinarian. But my life took a very different turn when adults -- including Jeffrey Epstein and his close friend Alan Dershowitz -- began to be interested in having sex with me.

4. In approximately 1999, when I was 15 years old, I met Ghislaine Maxwell. She is the daughter of Robert Maxwell, who had been a wealthy publisher in Britain. Maxwell asked that I come with her to Jeffrey Epstein's mansion for the purposes of teaching me how to perform "massages" and to train me professionally in that area. Soon after that I went to Epstein's home in Palm Beach on El Brillo Way.

5. From the first time I was taken to Epstein's mansion that day, his motivations and actions were sexual, as were Maxwell's. My father was not allowed inside. I was brought up some stairs. There was a naked guy, Epstein, on the table in the room. Epstein and Maxwell forced me into sexual activity with Epstein. I was 15 years old at the time. He seemed to be in his 40s or 50s. I was paid \$200. I was driven home by one of Epstein's employees.

EXHIBIT

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6. I came back for several days following and did the same sorts of sexual things for Epstein.

7. After I did those things for Epstein, he and Maxwell said they were going to have me travel and were going to get an education for me. They were promising me the world, that I would travel with Epstein on his private jet and have a well-paid profession. Epstein said he would eventually match me up with a wealthy person so that I would be "set up" for life.

8. So I started "working" exclusively for Epstein. He took me to New York on his big, private jet. We went to his mansion in New York City. I was shown to my room, a very luxurious room. The mansion was huge. I was very young and got scared because it was so big. Epstein brought me to a room with a massage parlor. Epstein made me engage in sexual activities with him there.

9. You can see how young I looked in the photograph below.



10. Epstein took me on a ferry boat on one of the trips to New York City and there he took the picture above. I was approximately 15 or 16 years old at the time.

11. Over the next few weeks, Jeffrey Epstein and Ghislaine Maxwell trained me to do what they wanted, including sexual activities. The training was in New York and Florida, at Epstein's mansions. It was basically every day and was like going to school. I also had to have sex with Epstein many times.

12. I was trained to be "everything a man wanted me to be." It wasn't just sexual training - they wanted me to be able to cater to all the needs of the men they were going to send me to. They said that they loved that I was very compliant and knew how to keep my mouth shut about what they expected me to do.

13. Epstein and Maxwell also told me that they wanted me to produce information for them in addition to performing sex on the men. They told me to pay attention to the details about what the men wanted, so I could report back to them.

14. While I had juvenile hopes of bettering my life, from very early on I was also afraid of Epstein. Epstein told me he was a billionaire. I told my mother that I was working for this rich guy, and she said "go, go far away." Epstein had promised me a lot, and I knew if I left I would be in big trouble. I was a witness to a lot of illegal and bad behavior by Epstein and his friends. If I left Epstein, he knew all kinds of powerful people. He could have had me killed or abducted, and I knew he was capable of that if I did not obey him. He let me know that he knew many people in high places. Speaking about himself, he said "I can get away" with things. Even as a teenager, I understood what this meant and it scared me, as I believe he intended.

15. I visited and traveled with Jeffrey Epstein from 1999 through the summer of

2002, and during that time I stayed with him for sexual activities at each of his houses (or mansions) in locations including New York City, New York; the area of Santa Fe, New Mexico; Palm Beach, Florida; an island in the U.S. Virgin Islands; and Paris, France. I had sex with him often in these places and also with the various people he demanded that I have sex with. Epstein paid me for many of these sexual encounters. Looking back, I realize that my only purpose for Epstein, Maxwell and their friends was to be used for sex.

16. To illustrate my connection to these places, I include four photographs taken of me in New Mexico (shown below). The first one is a museum in Santa Fe, New Mexico. We had gone sightseeing for the day. Epstein took this picture of me. I was approximately 17 at the time, judging from the looks of it. At the end of the day we returned to Epstein's Zorro Ranch. The second picture is me on one of Epstein's horses on the ranch in New Mexico. The following two are from wintertime in New Mexico.





17. When I was with him, Epstein had sex with underage girls on a daily basis. His interest in this kind of sex was obvious to the people around him. The activities were so obvious and bold that anyone spending any significant time at one of Epstein's residences would have clearly been aware of what was going on.

18. Epstein's code word for sexual encounters was that it was a "massage". At times the interaction between Epstein and the girls would start in a massage room setting, but it was always a sexual encounter and never just a massage.

19. In addition to constantly finding underage girls to satisfy their personal desires, Epstein and Maxwell also got girls for Epstein's friends and acquaintances. Epstein specifically told me that the reason for him doing this was so that they would "owe him," they would "be in his pocket," and he would "have something on them." I understood that Epstein thought he could get leniency if he was ever caught doing anything illegal, or that he could escape trouble altogether.

20. Harvard law professor Alan Dershowitz was around Epstein frequently. Dershowitz was so comfortable with the sex that was going on that on one occasion he observed me in sexual activity with Epstein.

21. I had sexual intercourse with Dershowitz at least six times. The first time was when I was about 16, early on in my servitude to Epstein, and it continued until I was 19.

22. The first time we had sex took place in New York in Epstein's home. It was in Epstein's room (not the massage room). I was approximately 16 years old at the time. I called Dershowitz "Alan." I knew he was a famous professor.

23. The second time that I had sex with Dershowitz was at Epstein's house in Palm Beach.

24. I also had sex with Dershowitz at Epstein's Zorro Ranch in New Mexico in the massage room off of the indoor pool area, which was still being painted.

25. We also had sex at Little Saint James Island in the U.S. Virgin Islands.

26. Another sexual encounter between me and Dershowitz happened on Epstein's airplane. Another girl was present on the plane with us.

27. I have recently seen Alan Dershowitz on television calling me a "liar." He is lying by denying that he had sex with me. The man I've seen on television, described as a former law professor, is the same man that I had sex with at least six times. Dershowitz also knows that Epstein had sex with other underage girls and lent me out to other people, but he is lying and denying that as well.

28. After years of abuse and being lent out, I began to look for a way to escape. I had first gone into Epstein's household because I wanted to be a massage therapist. Epstein had taken me

into his clutches through promises and talk and for some time I believed him. But once he had me under his control, regardless of my doubts and fears, I felt trapped.

29. I kept asking Epstein for my promised training and education. Epstein finally got me a plane ticket to Thailand to go to Chaing Mai to learn Thai massage. This sounded like my chance to escape. In September 2002, I packed my bags for good. I knew this would be my only opportunity to break away.

30. On September 27, 2002, I flew from JFK in New York to Chaing Mai, Thailand. I arrived around September 29 for my training. But Epstein was going to get something out of this trip as well. I was supposed to interview a girl there and bring her back to the United States for Epstein.

31.

32. I did the massage training in Chiang Mai. While I was there, I met a great and special guy and told him honestly what I was being forced to do. He told me I should get out of it. I told him that the people I was working for were very powerful and that I could not walk away or disobey them without risking serious punishment, including my life. He told me he would protect me. I had confidence in him and I saw his love and help as my opportunity to escape and to be with someone who truly loved me and would protect me. I married him and flew to Australia.

33. I called Epstein and told him I was not coming back. He asked why? I said "I've fallen in love." Epstein basically said "good luck and have a good life." I could tell he was not happy. I was afraid of what he was going to do to me. I thought he or one of his powerful friends might send someone to hurt me or have me killed.

34. From that point onward, out of concern for my safety and general well-being, I stayed in Australia with my husband. I was in Australia from late 2002 to October 2013. To be clear, I was never in the United States during these years, not even for a short trip to visit my mother. And my absence from the United States was not voluntary – I was hiding from Epstein out of fear of what he would do to me if I returned to the United States.

35. In around 2007, after not hearing from anyone for years, out of the blue I was contacted by someone who identified himself with a plain sounding name and claimed he was with the FBI. It seemed very odd for someone doing an official criminal investigation to just call up on the phone like that. I hadn't heard Epstein's name for years. I didn't know who this person was and what it was really about. I couldn't tell what was going on.

36. This man said he was looking into Jeffrey Epstein. The man asked if I had been involved with Epstein. My first instinct was to say nothing because I wasn't sure he was really with the FBI or any authorities. I answered a few basic questions, telling him that I knew Jeffrey Epstein and had met him at a young age. But the conversation didn't feel right. This man never offered to come and meet with me in person. Instead, he asked me right off the bat about Epstein's sexual practices. I thought it would be strange for a true law enforcement officer to behave that way, so I became increasingly uncomfortable and suspicious about who was actually calling me.

37. I told the man nothing more about Epstein. The conversation probably didn't even last three minutes, but it immediately triggered all of the fears of Epstein and his powerful friends that had caused me to escape in the first place. If the call accomplished anything, it only

put me back into a state of fear and told me that I could be found quite easily and had nobody official protecting me.

38. I suspected that the man who called me was working for Epstein or one of Epstein's powerful friends. I believed that if this was really an agent who was investigating Epstein, he would have known who I was and how I fit into Epstein's sexual crimes in many different places. He would have interviewed me in a way that would have established his credentials and would have shown how he could provide potential protection from Epstein. That never happened.

39. Getting a call from this supposed FBI Agent made me scared all over again. I had left that old life of sexual slavery behind me and started a new life in a new country in hopes that the powerful people whose illegal activities I knew all about would never find me.

40. Shortly after this purported FBI call, I was contacted by telephone by someone who appeared clearly to be working for Epstein. The caller told me about an investigation into Epstein and said that some of the girls being questioned were saying that Epstein had had sexual contact with them. After they made those allegations, the man said they were being discredited as drug addicts and prostitutes, but in my case, if I were to keep quiet, I would "be looked after." The fact that this call was made shortly after the supposed FBI call reinforced my concern that the man I had talked to earlier was not really working for the FBI but for Epstein. I didn't think that the FBI and Epstein would both be working together and would both get my phone number at almost exactly the same time. I played along and told this person that I had gotten a call from the "FBI" but that I didn't tell him anything. The person on the phone was pleased to hear that.

41. A short time later, one of Epstein lawyers (not Alan Dershowitz) called me, and then got Epstein on the line at the same time. Epstein and his lawyer basically asked again if I was going to say anything. The clear implication was that I should not. The way they were talking to me, I was afraid of what would happen if I didn't keep quiet. My thought was that if I didn't say what they wanted me to say, or not say, I might get hurt.

42. I promised Epstein and his lawyer that I would keep quiet. They seemed happy with that and that seemed to me the way to keep me and my family safe. And I did what Epstein and his lawyer told me to do. I kept quiet.

43. I now understand that Epstein reached a non-prosecution agreement with the federal government in 2007 and pled guilty to two state crimes in June 2008. No one told me anything about those events until much later. In fact, nobody called or came to see me to explain what a non-prosecution agreement was, what crimes Epstein could have been charged with, why he was not being charged with the crimes he had committed, or anything whatsoever about the case. I was never offered a chance to meaningfully confer with the prosecutor for the Government, and I was never notified of any hearing that could affect me or my rights as a crime victim to ever bring charges.

44. On September 3, 2008, the FBI sent a victim notification letter to me. This was the first written communication I had received from the FBI. The letter was attached as Exhibit I to my earlier statement. This kind of written communication, on official FBI stationary, is the way that I thought the FBI really communicated with people that they wanted to talk to. The fact that I got this official letter from them made me wonder even more whether the call I had received

earlier was really from the FBI. The letter that I got did not mention that anyone from the FBI had ever called me before.

45. The letter started off with the sentence: "By virtue of this letter, the United States Attorney's Office for the Southern District of Florida provides you with the following notice because you are an identified victim of a federal offense." That sentence (among others) made it seem like this was the first time the FBI was officially contacting me. That was the first time I was told about my rights as a crime victim.

46. I did not know what was happening about any criminal prosecution of Epstein at this time. I wanted him prosecuted. And given his constant illegal sexual behavior, I thought it was obvious that he should be prosecuted. But after reading the letter, I was confused. The letter did not explain what was actually happening or what role, if any, I could play. In fact, the letter thanked me for my assistance during the investigations, yet made no reference to what this supposed "assistance" consisted of.

47. Also, the letter did not directly say that Epstein's crimes against me were not going to be prosecuted. It just said that "the United States has agreed to defer federal prosecution in favor of this state plea and sentence" I did not know what that meant. The letter did not inform me how it applied to me. The letter also said that there was "litigation between the United States and two other victims regarding the disclosure of the entire agreement between the United States and Mr. Epstein." Understanding more about that case now, I realize that the letter did not explain that the real purpose of that litigation was not to get "disclosure of the entire agreement" but instead to get criminal charges filed against Epstein and to seemingly uphold the rights of Epstein's victims. I wish that the Government had told me what was really going on.

48. I saw on the letter that I could call a lawyer. The letter also mentioned Jack Goldberger, who I knew to be Epstein's attorney, which scared me. I first got in touch with the attorneys at the Podhurst Orseck firm. My lawyers filed a lawsuit against Epstein for me, which mentioned that I was abused by Epstein and other powerful people. I was hoping that the information I gave as part of my lawsuit might help to put Epstein in prison, but the lawsuit ended up just being about money, which Epstein paid to settle.

49. I continued living in Australia and, in 2011, was contacted by a journalist, who told me she was working for a British newspaper. She asked me if I had information about Prince Andrew. When I said that I did, she came out to Australia to meet with me.

50. At this point, since nothing else seemed to be working to get Epstein and his associates held accountable, I wanted to try by myself to get a message out to the public about what Epstein and his friends had done to me and other girls. I was very disturbed that no one was prosecuting Epstein for these crimes. I was also very scared. It seemed that law enforcement was not doing anything with the information they knew about me, which left me and my family vulnerable and fearful.

51. The journalist printed an article using some of the information I told her. Shortly after the article was published, I talked on the phone to Marie Villafañá, a federal prosecutor from Florida. I had seen her name on the official letter from the FBI, so she seemed legitimate. Villafañá seemed very interested in my case and seemed as if she wanted to do something.

52. Within a few weeks of the newspaper article being published, two FBI agents also called me in Australia and then came to meet me. In around March 2011, they met me at the U.S. Consulate in Sidney. They seemed to be very professional and hard working. I thought that

I had finally gotten the attention of the people that I wanted and that these people would do the right things against Epstein and the others. I also thought that they could protect me.

53. When I met with the agents, they mainly focused on Epstein. But while I was at the Consulate, I provided them some information about some of the others who were involved in illegal acts as well. I was aware that a false statement to these law enforcement officers was a crime and I told the truth, giving them information I could recall about the individuals they inquired about.

54. The agents were clearly prepared to meet me and already knew a lot about Epstein's crimes. The agents appeared to be very good at investigating and seemed like they really knew how to piece together the whole story. But at the same time, they seemed like they were being blocked from doing what they wanted to do – which I thought was to arrest Epstein and his powerful friends for all of their illegal sexual crimes.

55. Shortly after the FBI interview in 2011, I spoke to attorney Brad Edwards. He told me he had been sued by Jeffrey Epstein and wanted to know what I knew about Epstein and his associates' involvement with sexually abusing underage girls. I told him about my abuse and trafficking by Epstein. I also told him at that time that I had been sexually abused by Ghislaine Maxwell, Alan Dershowitz, and other powerful people.

56. In around April 2011, as a follow-up to my earlier call with Brad Edwards, I got a telephone call from him and another attorney, Jack Scarola. He and his firm wanted general information about whether various people had information relevant to the lawsuit. They told me that they were taping the conversation, and I had no problem with that. I cooperated with them and gave them information about which people had information relevant about Epstein's crimes.

57. Because it was over the phone and we did not know each other, they were polite and did not ask me a lot of details about specifically who I had sex with and what explicit sexual activities I was forced to participate in. It was a general, background interview.

58. As the months following the FBI meeting in Sydney passed, I was trying to be patient but I began wondering what was going on with regard to prosecuting Epstein. I continued to be confused about what was happening. I was hoping that some kind of prosecution would come out of these events, but when nothing came of them, I got upset. I wanted to do something to stop Epstein and the other people he associates with from continuing to sexually abuse girls. Law enforcement had taken my detailed statements, but nothing seemed to be happening. I wasn't sure what to do.

59. While I wanted to do what I could to get justice for what had happened to me, it was very hard for me to figure out how to get something done in the United States while living in a foreign country, especially after I had already gave information to the FBI that I believed they were using to investigate and eventually arrest Epstein.

60. To further my effort to Prevent Sexual Abuse and Sex Trafficking I founded the non-profit organization "Victims Refuse Silence" – www.victimsrefusesilence.org. I know that I can't stop abuse everywhere, but if I help save even a few victims from the kind of degradation I experienced I will have made a positive difference.

61. I asked two attorneys – Brad Edwards and Paul Cassell – to see if they could help me bring Epstein and his friends to justice. They agreed to try to add me to the existing CVRA case. They explained to me that the lawsuit was not asking to get money from Epstein or others. I

understand and have always understood that the goal of the case is to enforce my rights as a crime victim, rights that were unfairly taken away from me.

62. Epstein and his friends sexually and physically abused many other girls. They did this in many places around the world. I personally observed this. There are also many people who could confirm what I am saying. I hope that these people will come forward and tell the truth.

63. The trafficking of underage girls is a major problem in the United States and elsewhere. I will continue to cooperate fully in the investigation and prosecution of Epstein, Maxwell, or any of their friends who participated in the sexual abuse of minors. I also hope that this information is treated in a way that will keep me safe from Epstein and others identified here so as to encourage more victims of similar crimes to come forward. If these crimes are not prosecuted, despite my volunteering this information and cooperation, other victims will be deterred from coming forward.

64. In this affidavit, I have tried to focus on how I was trafficked for sexual purposes. I have not described all of the details of the sexual activities Epstein forced me to have. Also, I have not described all of the details of the other events discussed here. If a judge wants me to present my information in more detail, including specific descriptions of the sexual behaviors, likes and dislikes of the men Epstein sent me to, I could do so.

65. I have directed my attorneys, including Bradley J. Edwards and Paul G. Cassell, to pursue all reasonable and legitimate means to have criminal charges brought against these powerful people for the crimes they have committed against me and other girls. They are presenting me in *Jane Doe 1 and Jane Doe 2 v. United States* (S.D. Fla.) pro bono.


66. Because of how often Epstein and others were having sex with young girls, and how much it was a centerpiece of their lives, I doubt that they have stopped. It also seems to me that, when I knew them, they believed that they were above the law, too powerful to be prosecuted. That feeling has no doubt been reinforced by the fact Epstein has escape serious punishment with his plea bargain, and the others with whom he traveled have completely escaped the consequences of their actions. I hope that I can bring them to justice.

67. No one has pressured me into identifying Alan Dershowitz as one of Epstein's friends who sexually abused me. I identified him because he abused me. I authorized the public filing of my two affidavits in the *Jane Doe 1* and *Jane 2* case because those affidavits were the truth.

68. Since I filed my motion in the *Jane Doe 1* and *Jane 2* case, my credibility has been attacked, including extraordinary and persistent public attacks by Alan Dershowitz on me and my attorneys who believed in me. I am telling the truth and will not let these attacks prevent me from exposing the truth of how I was trafficked for sex to many powerful people.

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

Executed this 20th day of November, 2015. (Location of signature left undisclosed for security reasons).


Virginia Giuffre