

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**PLAINTIFF, VIRGINIA GIUFFRE'S REVISED DISCLOSURE  
PURSUANT TO FED. R. CIV. P. 26**

COMES NOW the Plaintiff, Virginia L. Giuffre, by and through her undersigned counsel,  
and serves this revised disclosure pursuant to Fed. R. Civ. P. 26 and states as follows:

**A. Witnesses:**

1. Virginia L. Giuffre  
c/o Sigrid S. McCawley, Esq.  
Boies, Schiller & Flexner LLP  
401 East Las Olas Boulevard, Suite 1200  
Miami, Florida 33301  
Tel: (954) 356-0011  
Email: [smccawley@bsflp.com](mailto:smccawley@bsflp.com)  
  
Plaintiff - information regarding Defendant, Ghislaine Maxwell's conduct that is  
the subject of this action
2. Ghislaine Maxwell  
c/o Laura A. Menninger, Esq.  
HADDON, MORGAN & FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, Colorado 80203  
Tel: (303) 831-7364  
Email: [lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)

Defendant in this action.

3. Juan Alessi  
6791 Fairway Lakes Drive, Boynton Beach, FL 33472  
Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

4. Maria Alessi  
6791 Fairway Lakes Drive, Boynton Beach, FL 33472  
Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

5. Doug Band  
President of Teneo Holdings, 601 Lexington Avenue, 45<sup>th</sup> Floor,  
New York, NY 10022, Tel: (212) 886-1600

Was present on flights with Jeffrey Epstein and Ghislaine Maxwell and President Clinton and may have knowledge of Jeffrey Epstein and Ghislaine Maxwell's sexual trafficking conduct and interactions with minors.

6. Gwendolyn Beck  
P.O. Box 705, Arlington, VA 22216  
(703) 656-6007

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

7. Sophie Biddle  
388 W. Carmel Valley Road, Carmel Valley, CA 93924  
Tel: (310) 394-7048

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

8. Nadia Bjorlin  
c/o Cris Armenta, Esq.  
11900 Olympic Blvd., Suite 730, Los Angeles, CA 90064  
Tel: (310) 826-2826

Was present on flights with Jeffrey Epstein, Ghislaine Maxwell and Virginia Guiffre and may have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

9. Kelly Bovino  
16694 Via La Costa, Pacific Palisades, CA 90272  
Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

10. Jean Luc Brunel  
c/o Joe Titone, Esq.  
621 South East 5th Street, Pompano Beach, FL 33060  
Tel: (954) 729-6490

Was present on flights with Jeffrey Epstein, Ghislaine Maxwell and Virginia Guiffre and has information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

11. Ron Burkle  
Address unknown at this time  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

12. Dana Burns  
Address unknown at this time.  
Telephone number unknown at this time

Worked for Ghislaine Maxwell and has information about Ghislaine Maxwell's recruiting of girls for Jeffrey Epstein.

13. Alyson Chambers  
c/o Marshall Dore Louis, Esq.  
Sinclair, Louis & Zavertrnik, P.A.  
40 N.W. 3<sup>rd</sup> Street, Suite 200, Miami, FL 33128  
Tel: (305) 374-0544

Worked for Jeffrey Epstein as a masseuse during the time that Virginia Giuffre was living and traveling with Jeffrey Epstein and Ghislaine Maxwell, and has information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

14. Maximilia Cordero  
Address unknown at this time  
Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

15. Valdson Cotrin  
Address unknown at this time  
Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

16. Chauntae Davies  
1017 N. Spaulding Avenue, #8, West Hollywood, CA 90056  
Telephone number unknown at this time

Was present on flights with Jeffrey Epstein, Ghislaine Maxwell and may have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

17. Teala Davies  
1212 N. Clark Street, Apt. #7, West Hollywood, CA 90069  
Telephone number unknown at this time

Was present on flights with Jeffrey Epstein, Ghislaine Maxwell and may have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

18. Anouska DeGeorgieou  
536 N. Edinburgh Avenue, Los Angeles, CA 90048  
Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

19. Alan Dershowitz  
c/o Richard A. Simpson, Esq.  
WILEY REIN, LLP  
1776 K Street NW  
Washington, D.C. 20006  
Tel: (202) 719-7000

Has knowledge of Defendant's conduct that is the subject of this action.

20. Ryan Dionne  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

21. Eva Anderson Dubin  
1090 N. Lake Way, Palm Beach, FL 33480  
1040 5<sup>th</sup> Avenue, #15, New York, NY 10028  
Telephone number unknown at this time

Was present on flights with Jeffrey Epstein, Ghislaine Maxwell and has information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

22. Glen Dubin  
1090 N. Lake Way, Palm Beach, FL 33480  
1040 5<sup>th</sup> Avenue, #15, New York, NY 10028  
Telephone number unknown at this time

Was present on flights with Jeffrey Epstein, Ghislaine Maxwell and has information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

23. Prince Andrew Albert Christian Edward, Duke of York  
Buckingham Palace Rd, London SW1A 1AA  
Tel: 020 7766 7300

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors, including Virginia Giuffre.

24. Jeffrey Epstein  
c/o Tonja Haddad Coleman, Esq.  
315 SE 7<sup>th</sup> Street, Suite 301  
Fort Lauderdale, FL 33301  
Tel: (954) 467-1223  
and  
c/o Marty Weinberg, Esq.  
20 Park Plaza, Suite 1000, Boston, MA 02116  
Tel: (617) 227-3700

Has knowledge of Defendant's conduct that is the subject of this action and knowledge of his sexual trafficking operation and other co-conspirators.

25. Tatiana Espinoza  
Address unknown at this time  
Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

26. Frederic Fekkai  
Address unknown at this time  
Telephone number unknown at this time

Has knowledge of Defendant's conduct that is the subject of this action.

27. Tony Figueroa  
104 Houston School Ct, Red Oak, TX 75154  
Telephone number unknown at this time

Has knowledge of Defendant's conduct that is the subject of this action.

28. Luciano "Jojo" Fontanilla  
18 Teneyck Avenue, Valley Stream, NY 11580-4016  
917-975-4500

Jeffrey Epstein's staff member in his various homes and may have knowledge of Defendant and Jeffrey Epstein's inappropriate conduct with underage girls.

29. Lynn Fontanilla  
18 Teneyck Avenue, Valley Stream, NY 11580-4016  
Telephone number unknown at this time

May have knowledge of Defendant's conduct that is the subject of this action.

30. Michael Friedman  
53320 Avenida Madero, La Quinta, CA 92253  
Telephone number unknown at this time

Former house staff and may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with minors.

31. Rosalie Friedman  
53320 Avenida Madero, La Quinta, CA 92253  
Telephone number unknown at this time

Former house staff and may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with minors.

32. Tiffany Kathryn Gramza  
3927 Downey Ct, Simi Valley, CA 93063-2836  
Telephone number unknown at this time

May have information about Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

33. Eric Gany  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

34. Amanda Grant  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

35. Lesley Groff  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

36. Claire Hazel  
Address unknown at this time  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

37. Shelly Harrison  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

38. Stephen Kaufman  
Address unknown at this time  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

39. Sarah Kensington Vickers formerly Sarah Kellen  
50 S. Pointe Dr, Apt. 2304, Miami Beach, FL 33139  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interactions with minors.

40. Tatiana Kovylin  
1 Central Park South, #1306, New York, NY 10019-1732  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

41. Banu Kucukkoylu  
4712 Admiralty Way, # 383, Marina Del Rey, CA 90292  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

42. Adam Perry Lang  
Address unknown at this time  
Telephone number unknown at this time

Traveling chef for Jeffrey Epstein and Ghislaine Maxwell and may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.



43. Shelly Ann Lewis  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

44. Michael Liffman  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

45. Peter Listerman  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

46. Cindy Lopez  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

47. Melinda Lutz  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

48. Cheri Lynch  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

49. Nadia Marcinko formerly Nadia Marcinkova  
301 E. 66th Street, New York, NY 10065-6205  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

50. Todd Meister  
101 Seminole Avenue, Palm Beach, FL 38480  
Tel: (561) 650-0083

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors

51. Brahakmana Mellawa  
Address unknown at this time  
Telephone number unknown at this time

House staff who may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

52. Jayarukshi Mellawa  
Address unknown at this time  
Telephone number unknown at this time

House staff who may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

53. George Mitchell  
Address unknown at this time  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

54. Bill Peadon  
617 Piedmont Rd, West Palm Beach, FL 33405-1534  
Telephone number unknown at this time

House staff that may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

55. Francis Peadon  
617 Piedmont Rd, West Palm Beach, FL 33405-1534  
Telephone number unknown at this time

House staff that may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

56. Tom Pritzker  
Address unknown at this time  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

57. Louella Rabuyo  
Address unknown at this time  
Telephone unknown at this time

House staff that may have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

58. Bill Richardson  
Address unknown at this time  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

59. Rinaldo Rizzo  
Address unknown at this time  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

60. Haley Robson  
Address unknown at this time  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

61. David Rogers  
c/o Bruce E. Reinhart, Esq.  
Tel: (561) 202-6360

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

62. Adriana Ross formerly Adriana Mucinska  
c/o Alan S. Ross, Esq.  
Tel: (305) 858-9550

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

63. Johanna Sjoberg  
c/o Marshall Dore Louis, Esq.  
40 N.W. 3<sup>rd</sup> Street, Suite 200, Miami, FL 33128  
Tel: (305) 374-0544

Worked for Jeffrey Epstein during the time when Virginia Giuffre was living and traveling with Jeffrey Epstein and Ghislaine Maxwell. Johanna Sjoberg was also present at an occasion with Prince Andrew, Ghislaine Maxwell, and Virginia Giuffre when Ms. Giuffre was a minor.

64. Kelly Spamm  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

65. Emmy Taylor  
Address unknown at this time  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

66. Evelyn Valenzuela  
Address unknown at this time  
Telephone number unknown at this time

May have knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct.

67. Larry Visosky  
c/o Bruce E. Reinhart, Esq.  
Tel: (561) 202-6360  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

68. Leslie Wexner  
c/o John W. Zeiger, Esq., Zeiger, Tigges & Little LLP  
41 South High Street, Suite 3500, Columbus, Ohio 43215  
Tel: (614) 365-9900

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors..

69. Igor Zinoviev  
Address unknown at this time  
Telephone number unknown at this time

Has knowledge of Ghislaine Maxwell and Jeffrey Epstein's sexual trafficking conduct and interaction with underage minors.

70. All other then-minor girls, recruited by Ghislaine Maxwell, whose identities Ms. Giuffre will attempt to determine, with whom Defendant, Ghislaine Maxwell and Jeffrey Epstein, have engaged in sexual activity.
71. All pilots, chauffeurs, chefs, and other employees of either Defendant Maxwell or Jeffrey Epstein with knowledge of Defendant and Jeffrey Epstein's inappropriate conduct with underage girls.
72. All staff and employees at the Mar-a-Lago Club during 1999-2002.
73. All other witnesses learned through discovery process.

**B. Exhibits:**

1. Palm Beach Police Department report and documents contained within Jeffrey Epstein's criminal files, attached hereto as Exhibit 1.

2. March 10, 2011 Statement on behalf of Ghislaine Maxwell by Media agent Ross Gow, attached hereto as Exhibit 2.
3. September 3, 2008 Victim Notification Letter, attached hereto as Exhibit 3.
4. May 1, 2009 Complaint in Jane Doe No. 102 v. Jeffrey Epstein, CIV-09-80656, in the Southern District of Florida, attached hereto as Exhibit 4.
5. FBI 302 Statement, attached hereto as Exhibit 5.
6. Flight Logs, attached hereto as Composite Exhibit 6.
7. Message Pads from Law Enforcement from trash pull of Jeffrey Epstein's Palm Beach home, attached hereto as Exhibit 7.
8. Jeffrey Epstein's Phone Book, also referred to as his "Black Book," attached hereto as Exhibit 8.
9. Deposition of Sarah Kellen, attached hereto as Composite Exhibit 9.
10. Deposition Transcripts of Juan Alessi, attached hereto as Exhibit 10.
11. Deposition Transcripts of Alfredo Rodriguez, attached hereto as Exhibit 11.
12. January 2, 2015 Corrected Joinder Motion [DE 280] filed in the CVRA action pending in the Southern District of Florida, attached hereto as Exhibit 12. **[All paragraphs between "The Government then concealed from Jane Doe No. 3 the existence of the NPA (pg. 3) and "The Government was well aware of Jane Doe No. 3 when it was negotiating the NPA" (pg. 6) were stricken by Judge Marra.]**
13. January 21, 2015 Declaration of Jane Doe No. 3 filed in the CVRA action pending in the Southern District of Florida, attached hereto as Exhibit 13. **[Paragraphs 4, 5, 7, 11, 13, 15, 19-53, and 59 were stricken by Judge Marra]**
14. February 6, 2015 Declaration of Jane Doe No. 3 filed in the CVRA action pending in the Southern District of Florida, attached hereto as Exhibit 14. **[Paragraphs 7-12, 16, 39 and 49 were stricken by Judge Marra.]**
15. November 25, 2015 Affidavit of Virginia Giuffre, filed in the *Bradley Edwards and Paul Cassell v. Alan Dershowitz* matter, pending in the Seventeenth Judicial Circuit, Broward County, Florida, attached hereto as Exhibit 15.
16. Virginia Roberts' passport, attached hereto as Exhibit 16.
17. Judge Thomas Lynch's January 12, 2016 Confidentiality Order regarding Virginia Giuffre's deposition, attached hereto as Exhibit 17.
18. Documents produced and bates labelled Non-Party VR 000001 – Non-Party VR 000644, in the *Bradley Edwards and Paul Cassell v. Alan Dershowitz* matter,

pending in the Seventeenth Judicial Circuit, Broward County, Florida, attached hereto as Exhibit 18.

19. Victims Refuse Silence Articles of Incorporation and Amendment, attached hereto as Composite Exhibit 19.
20. Victims Refuse Silence By-laws, attached hereto as Exhibit 20.
21. Victims Refuse Silence 2016 Annual Report, attached hereto as Exhibit 21.
22. January 3, 2015 Daily Mail article: "Harvard Law Professor Named Alongside Prince Andrew in 'Sex Slave' Case Accuses Alleged Victim of 'Making Up Stories,'" attached hereto as Exhibit 22.
23. January 3, 2015 Press Statement issued by Ross Gow to Express set forth in "Ghislaine Maxwell: I was not a madam for paedophile," attached as Exhibit 23.
24. January 4, 2015 Statement by Ghislaine Maxwell to New York Daily News Reporter "Alleged Madam Accused of Supplying Prince Andrew With Underage Teen for Sex Spotted in NYC – As He's Seen Cutting Swiss Vacation Short to Face Queen," attached hereto as Exhibit 24.
25. February 1, 2015 Mirror article: "Prince Andrew's Pal Ghislaine Maxwell May Sue Over Madam Allegations," attached hereto as Exhibit 25.
26. September 23, 2007 Red Ice Creations Article "Prince Andrew's Friend, Ghislaine Maxwell, Some Underage Girls, and A Very Disturbing Story," attached hereto as Exhibit 26.
27. Photographs, attached hereto as Exhibit 27.
28. April 13, 2010 Deposition Transcript of Nadia Marcinkova, attached hereto as Exhibit 28.

**C. Computation of damages:**

1. Physical, psychological and psychiatric injuries and resulting medical expenses – in an amount of approximately \$ 102,200 present value.
  - a. **Computation Analysis:**
    - i. Giuffre has had to receive treatment for the psychological harm as a result of Maxwell's conduct towards Giuffre.
    - ii. The average annual expenditures for mental health services for adults 18-64 in the United States is \$1,751.

- iii. Giuffre needs continuing care as a result of the harm she has suffered. Ms. Giuffre was born August 9, 1983 and was 31.4 years old at the beginning of 2015 when the alleged harm occurred. The average remaining life expectancy for a 31 year old female is 51.1 years.
- iv. Based on a remaining life expectancy of 51.1 years, annual healthcare cost growth of 3.3% and a discount rate of 2.7%, the present value of expected treatment costs is \$102,200 as of 1/1/2015.

b. **Supporting Evidence:**

- i. Ms. Giuffre is in the process of collecting records from her physicians
- ii. Ms. Giuffre's testimony
- iii. Ms. Giuffre is in the process of retaining an expert to calculate damages, and will provide further information through expert disclosure.

2. Past, present and future pain and suffering, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of standing in the community, loss of dignity and invasion of privacy in her public and private life not less than \$30,000,000.00.

a. **Computation Analysis**

- i. Under New York law, defamation per se as alleged in this case presumes damages and special damages do not need to be plead and proven. *See Celle v. Filipino Reporter Enterprises Inc.*, 209 F.3d 163, 179 (2<sup>nd</sup> Cir. 2000) (Second Circuit holding that '[i]f a statement is defamatory per se, injury is assumed. In such a case 'even where the plaintiff can show no actual damages at all, a plaintiff who has otherwise shown defamation may recover at least nominal damages' and the Second Circuit also confirmed an award of punitive damages). Ms. Giuffre has been severely damaged by the defamation of the defendant, by calling her claims of sexual abuse "obvious lies". The defamation caused Ms. Giuffre to re-live the sexual abuse she previously endured. Ms. Giuffre has suffered and continues to suffer from the pain, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of standing in the community, loss of dignity and invasion of privacy in her public and private life. The computation of this amount is in the province of the jury but Ms. Giuffre contends, including but not limited to, awards in other similar matters, that the



amount is not less than \$30,000,000.00. Ms. Giuffre is in the process of retaining an expert, and will provide further information through expert disclosure.

b. **Supporting Evidence**

- i. Ms. Giuffre's testimony
- ii. Witness testimony
- iii. Awards in similar matters
- iv. Ms. Giuffre is in the process of retaining an expert, and will provide further information through expert disclosure.

3. Estimated lost income of \$180,000 annually. Present value of \$3,461,000 to \$5,407,000.

a. **Computation Analysis**

- i. Ms. Giuffre's estimated compensation capacity is \$180,000 annually. Ms. Giuffre was born August 9, 1983 and was 31.4 years old at the beginning of 2015 when the alleged injury occurred. Her expected remaining work life based on mortality and probability of continued work was 20.2 years. Based on these factors, a 2% annual growth rate and a 2.4% discount rate, the present value of lost compensation is \$3,461,000 as of 1/1/2015.
- ii. Alternatively, if Ms. Giuffre is assumed to work until a normal retirement age of 65, or 33.6 years from her age at the beginning of 2015, and based on an annual growth rate of 2.0% and a discount rate of 2.7%, the present value of lost compensation is \$5,407,000 as of 1/1/2015.

b. **Supporting Evidence**

- i. Materials regarding compensation and work life expectancy
  - 1) 2010 Life Table for Females, *National Vital Statistics Report*, November 6, 2014, U.S. Department of Health & Human Services, Centers for Disease Control & Prevention, National Center for Health Statistics.

- 2) “Calculation of Work life Expectancy Using the Life, Participation, Employment Method,” Vocational Econometrics, Inc.
    - 3) Consumer Price Index for Urban Wage Earners and Clerical Workers, United States Department of Labor, Bureau of Labor Statistics.
    - 4) Federal Reserve Statistical Release H.15, 1/5/2015.
  - ii. Ms. Giuffre’s testimony
  - iii. Ms. Giuffre is in the process of retaining a damages expert and will provide further information through expert disclosures.
4. **Punitive Damages** - to be based upon all relevant factors, including the egregious nature of Defendant, Ghislaine Maxwell’s conduct and the need for a large award to punish and deter conduct in view of the vast wealth of Defendant Maxwell, in an amount not less than \$50,000,000.00.
- a. This calculation is in the province of the jury.

Dated March 11, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley  
Sigrid McCawley (Pro Hac Vice)  
Boies Schiller & Flexner LLP  
401 E. Las Olas Blvd., Suite 1200  
Ft. Lauderdale, FL 33301  
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David Boies  
Boies Schiller & Flexner LLP  
333 Main Street  
Armonk, NY 10504

Ellen Brockman  
Boies Schiller & Flexner LLP  
575 Lexington Ave  
New York, New York 10022  
(212) 446-2300

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true and correct copy of the above and foregoing Disclosure Pursuant to Fed. R. Civ. P. 26 has been provided by United States mail and electronic mail to all counsel of record identified below, on this 11th day of March, 2016.

Laura A. Menninger, Esq.  
HADDON, MORGAN & FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, Colorado 80203  
Tel: (303) 831-7364  
Fax: (303) 832-2628  
Email: [lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)

By: /s/ Sigrid McCawley  
Sigrid McCawley