

# **EXHIBIT D**

# President Trump on witness list in Palm Beach lawsuit involving billionaire pedophile

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By Dan Christensen

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**By Dan Christensen, FloridaBulldog.org**

President Donald Trump is on a list of witnesses for trial in a Palm Beach lawsuit that pits billionaire pedophile Jeffrey Epstein against a Fort Lauderdale attorney who represents Epstein's victims.

The case appears bound for trial this summer following a Feb. 9 ruling by the Florida Supreme Court in another case that has allowed Fort Lauderdale lawyer Bradley Edwards' claim of malicious prosecution against Epstein to proceed.

President Trump "has been identified as an individual who may have information relating to these allegations," said Edwards' West Palm Beach attorney Jack Scarola, who placed Trump's name on a witness list on Aug. 31. "But it's unlikely that he would ever be called" to appear at trial, especially now that he's assumed the presidency.

Scarola said Trump is one of a number of high-profile individuals whose testimony might be relevant because they "had a relationship with Epstein that would have at least exposed them potentially to what was going on inside Epstein's Palm Beach home ... during the relevant period of time" between 2001-2007.

What was going on in Epstein's mansion, court papers say, was an ugly child molestation scheme involving sex with "substantially more" than 40 girls, some as young as 12. A "statement of undisputed facts" filed by Scarola says Epstein used his staff and his victims to recruit more victims, employing "a pyramid abuse scheme in which he paid underage victims \$200-\$300 cash for each other underage victim that she brought to him."

"There is no evidence the President was involved in Epstein's schemes," Scarola said.

Still, the spectacle of a U.S. president being drawn into sordid litigation involving a notorious politically connected sexual criminal who got an apparent sweetheart deal from then-Miami U.S. Attorney Alex Acosta, now Trump's nominee to become U.S. Secretary of Labor, represents a potential political nightmare for the White House.

The White House press office did not respond to requests for comment.

Epstein's attorney, Tonja Haddad Coleman, declined to comment.

## An affidavit about Trump

A little-noticed affidavit by Edwards recounting his knowledge of Trump's involvement with Epstein is recounted further below in this story.

Investment banker Epstein, represented by a team of high-powered lawyers, pleaded guilty June 30, 2008 in Palm Beach Circuit Court to two felonies: procuring a person under 18 for prostitution and offering to commit prostitution. He served 13 months of an 18-month sentence. The *Palm Beach Daily News* has reported Epstein served his time



President Trump and Jeffrey Epstein

in “a vacant wing at the Palm Beach County Stockade with liberal work-release privileges.”



Secretary of Labor nominee Alex Acosta

Today, Epstein, 64, is a [registered sex offender](#).

In exchange for his plea, U.S. Attorney Acosta agreed not prosecute Epstein or his employees on federal charges contained in a 53-page indictment. A 2007 federal non-prosecution agreement with Epstein states, among other things, that he “knowingly and willfully” conspired with others to use interstate commerce to “persuade, induce, or entice minor females to engage in prostitution.”

If convicted of that charge, and others cited in the agreement, Epstein faced possible prison for life.

Republican Acosta, dean of Florida International University’s Law School and chairman of U.S. Century Bank, is expected to be asked about his treatment of Epstein at his Senate confirmation hearing on Wednesday.

In addition to the malicious prosecution claim against Epstein, attorney Edwards is also suing the government on behalf of “Jane Doe 1 and Jane Doe 2” and others under the federal Crime Victims’ Rights Act (CVRA). The lawsuit, filed in 2008, alleges the U.S. Attorney’s Office under Acosta violated the rights of Epstein’s victims by, among other things, “conspiring” with Epstein to keep them “in the dark” so the plea arrangement could be done without the victims “raising any objection.”

In February 2016, Edwards and co-counsel Paul Cassell filed a still-pending motion for summary judgment that says Acosta’s successor, Wifredo Ferrer, “has continued to fight” victims’ efforts “to have the court declare that their rights were violated.” The motion asks U.S. District Judge Kenneth Marra to rule that the government violated the victims’ rights and explore possible remedies. Ferrer stepped down March 3.

### Addressing a “terrible injustice”

“Both Brad and Professor Cassell undertook and have continued to prosecute the CVRA claim to address what they perceive to be a terrible injustice,” said Scarola. “There is no claim for money damages and there is no prevailing party provision in the CVRA” that would allow them to collect legal fees for their work on the case.

Attorney Edwards began representing several of Epstein’s victims while maintaining a solo law practice in 2008, settling a number of claims for undisclosed amounts two years later.

For eight months in 2009, however, he worked for Rothstein, Rosenfeldt and Adler, the law firm that spectacularly imploded in scandal in November of that year when it was discovered that founder Scott Rothstein was running a giant Ponzi scheme. Rothstein, now in prison, enticed investors by falsely claiming that they could buy into lucrative pending settlements in whistleblower, sexual harassment and other cases.

Edwards’ court papers say he knew nothing of Rothstein’s schemes, and federal authorities later determined Edwards to have been one of Rothstein’s victims. In 2009, however, Epstein sued Rothstein, Edwards and one of Edwards’ clients alleging, among other things, civil racketeering. Edwards’ court response: the suit was filed “for the sole purpose of attempting to intimidate” him and his client.



Wifredo Ferrer, who stepped down as Miami U.S. Attorney earlier this month

Epstein later dropped all his allegations, and Edwards since has turned the case back against him with his counterclaim of malicious prosecution. The case was on hold for two years pending last month's Florida Supreme Court ruling, which reversed a lower court decision that dismissed the accusation on technical grounds.

Edwards won't discuss either case. But in a little-noticed 2010 affidavit, given a year after the case was filed, Edwards explained why he thought Trump and other notables involved with Epstein, including former President Bill Clinton, might have relevant information to provide.

"If you've read Brad's affidavit then you know everything there is to know regarding Trump," Scarola said.

## Does Trump have knowledge of Epstein's crimes?

In his affidavit, Edwards suggests Trump has personal knowledge of Epstein's criminality.

"I learned through a source that Trump banned Epstein from his Maralago [Mar-A- Lago] Club in West Palm Beach because Epstein sexually assaulted an underage girl at the club," Edwards stated.

The affidavit notes that Trump visited Epstein at Epstein's West Palm Beach home – "the same home where Epstein abused minor girls daily."



Fort Lauderdale attorney Bradley Edwards

A "review of message pads confiscated from Epstein's home" showed "that Trump called Epstein's West Palm Beach mansion on several occasions during the time period relevant to my client's complaints," the affidavit says. Likewise "Epstein's phone directory from his computer contains 14 phone numbers for Donald Trump, including emergency numbers, car numbers, and numbers to Trump's security guard and houseman."

The affidavit goes on to say that one of Epstein's victims "Jane Doe #102" has alleged that she was initially approached at Trump's Mar-A-Lago by Ghislaine Maxwell and recruited to be Maxwell and Epstein's "underage sex slave."

Maxwell, daughter of the late British publishing baron Robert Maxwell, is named in the affidavit as an Epstein associate of interest. She is described in court papers as Epstein's "longtime companion" who helped run his companies and "recruit underage children" for the pleasure of both Epstein and herself. The affidavit says she attended the wedding of Chelsea Clinton, Bill and Hillary Clinton's daughter, in July 2010.

The affidavit goes on to cite the 2009 deposition of Epstein's brother, Mark Epstein, who "testified that Trump flew on Jeffrey Epstein's plane with him (the same plane that Jane Doe 102 alleged was used to have sex with underage girls)."

Likewise, attorney Edwards cited in his affidavit a 2002 *New York Magazine* article about Epstein titled, "Jeffrey Epstein: International Moneyman of Mystery."

"I've known Jeff for fifteen years. Terrific guy," said Trump, then a prominent, wealthy New York developer. "He's a lot of fun to be with. It is even said that he likes beautiful women as much as I do, and many of them are on the younger side. No doubt about it – Jeffrey enjoys his social life."

The subtitle of the article about Epstein: "He's pals with a passel of Nobel Prize-winning scientists, CEOs like Leslie Wexner of the Limited, socialite Ghislaine Maxwell, even Donald Trump. But it wasn't until he flew Bill Clinton, Kevin Spacey, and Chris Tucker to Africa on his private Boeing 727 that the world began to wonder who he is."

## A second U.S. president

While ex-President Clinton is not on the witness list for trial, Edwards listed a number of reasons in his affidavit to believe that Clinton might have relevant information about Epstein. They include:

- Clinton's "well known" friendship with Ghislaine Maxwell, an alleged enabler of Epstein's sexual crimes with young girls.
- Clinton's highly publicized travel with Epstein and Maxwell aboard Epstein's private plane to Africa. Flight logs for "the relevant years 2002-2005 showed Clinton traveling on Epstein's plane on more than 10 occasions and his assistant, Doug Band, traveled on many more occasions." The logs also showed Clinton traveled with other "employees and/or co-conspirators of Epstein's that were closely connected to Epstein's child exploitation and sexual abuse."
- "Jane Doe No. 102 stated generally that she was required by Epstein to be exploited not only by Epstein but also Epstein's 'adult male peers, including royalty, politicians, academicians, businessmen and/or other professional and personal acquaintances' – categories Clinton and acquaintances of Clinton fall into."
- "Clinton frequently flew with Epstein aboard his plane, then suddenly stopped – raising the suspicion that the friendship abruptly ended, perhaps because of events related to Epstein's sexual abuse of children."
- Epstein's computer contact list "contains e-mail addresses for Clinton along with 21 phone numbers for him."

Attorney Scarola would not say why Clinton is not on the Aug. 31 witness list, stating he is "not at liberty to discuss our litigation strategy."

Edwards initially sought to depose Trump and Clinton about Epstein, but never did. Scarola said there was no need to depose them after Epstein dropped his racketeering and other claims against Edwards.

While there are other notables on the witness list of those with knowledge of Epstein, including retired Harvard University law professor Alan Dershowitz and illusionist David Copperfield, there's only one other politician. That's ex-New Mexico Governor and Clinton Administration Secretary of Energy Bill Richardson.



Ex-President Bill Clinton

The affidavit says Epstein's personal pilot, Larry Morrison, testified in a 2009 deposition about "Richardson joining Epstein at Epstein's New Mexico ranch" and that "there was information that Epstein had young girls at his ranch which, given the circumstances of the case, raised the reasonable inference he was sexually abusing these girls since he had regularly and frequently abused girls in West Palm Beach and elsewhere.

"Richardson had also returned campaign donations that were given to him by Epstein, indicating that he believed that there was something about Epstein that he did not want to be associated with," the affidavit says.

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