

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA GIUFFRE,

Plaintiff,

-against-

GHISLAINE MAXWELL,

Defendant.

Index No. 15 Civ. 7433 (RWS)

**SUPPLEMENTAL
DECLARATION OF
ALAN M. DERSHOWITZ**

ALAN M. DERSHOWITZ declares under penalty of perjury that the following is true and correct:

1. I am personally familiar with the facts set forth in this supplemental declaration, which I am submitting to clarify certain averments made in my August 11, 2016 declaration in support of my pending motion to intervene and to unseal documents.

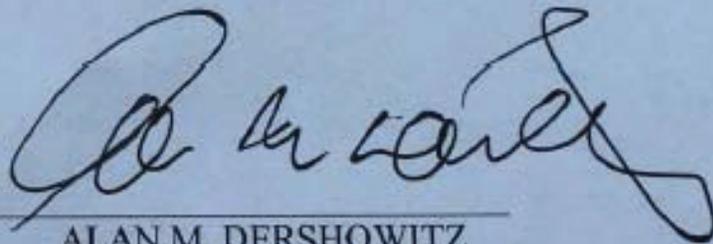
2. In my previous declaration, I characterized the offenses to which Jeffrey Epstein pleaded guilty as “involving sex with minors” (¶ 7) and “related to sex with minors” (¶ 10). These statements were imprecise; they were not intended to imply that Mr. Epstein was convicted of having sex with minors (he was not). Rather, and for the avoidance of any ambiguity, Mr. Epstein pleaded guilty to solicitation of prostitution and to procuring a person under the age of 18 for prostitution.

3. In paragraph 11 of my previous declaration, I stated: “During the criminal investigation of Mr. Epstein, which spanned the years 2006 through 2008, Ms. Giuffre was interviewed by law enforcement and provided details about Mr. Epstein’s alleged criminal acts.” I further stated: “Ms. Giuffre did not allege to law enforcement that I engaged in sexual

misconduct of any sort. According to the Assistant United States Attorney in charge of negotiating Mr. Epstein's plea arrangement, while he was at the U.S. Attorney's Office, Ms. Giuffre never mentioned me as having been involved in any sexual misconduct, much less suggested that she had been trafficked to me by Mr. Epstein." This language may confuse the precise timeline of these events. According to FBI records, Ms. Giuffre was contacted in 2007 about the investigation of Mr. Epstein, although she did not provide a detailed interview at that time. Ms. Giuffre has asserted elsewhere that she first supplied details concerning her allegations against Mr. Epstein in 2011. Regardless, I was told by the Assistant United States Attorney that he was aware of no allegations made against me by anyone during his tenure at the U.S. Attorney's Office, where he worked until approximately 2010. As further detailed in my previous declaration, as far as I am aware, Ms. Giuffre never claimed that I had sexual contact with her—a claim that is utterly false—before her filing in the CVRA Action in late 2014.

Dated: August 19, 2016

Chilmark, Massachusetts



ALAN M. DERSHOWITZ