

United States also agrees that it will not institute criminal char[g]es against any potential co-conspirators of Epstein, including but not limited to” four of Epstein’s assistants. Pet. App. 31a; see Pet. 3-4. But “[n]onprosecution agreements, like plea bargains, are contractual in nature, and are therefore interpreted in accordance with general principles of contract law.” *United States v. Castaneda*, 162 F.3d 832, 835 (5th Cir. 1998); cf. *Santobello v. New York*, 404 U.S. 257, 262 (1971). And like other contracts, the NPA “must be read as a whole” and in proper context. *United States v. Moreno-Membache*, 995 F.3d 249, 256 (D.C. Cir. 2021).

While “the United States” could conceivably refer to the entire federal government, as petitioner urges, the entirety and context of the NPA here make clear that the term is used—as it often is—as one alternative way to refer to the USAO executing the agreement. See Pet. App. 56a (noting that “the United States” is “common shorthand” for the USAO); *United States v. Trevino*, 556 F.2d 1265, 1271 (5th Cir. 1977) (interpreting “the United States” in a statute to mean “the prosecutorial division of the government”) (emphasis omitted); cf. *United States v. Rourke*, 74 F.3d 802, 807 (7th Cir.) (“within the criminal justice system throughout the country, the term ‘the government’ is widely used and understood to refer to the ‘prosecution,’ or ‘the United States Attorney’”), cert. denied, 517 U.S. 1215 (1996). Among other things, the NPA invoked “the authority of R. Alexander Acosta, United States Attorney for the Southern District of Florida,” and listed only officials of that USAO in the signature block, Pet. App. 26a; see *id.* at 33a-34a, 36a-38a—showing that the agreement was with the USAO, not the entire DOJ.

While petitioner emphasizes (Pet. 18) the paragraph stating that Epstein sought “to resolve globally his state and federal criminal liability,” Pet. App. 25a, even as to “his” federal liability specifically, the agreement by its terms protected him from federal prosecution only “in this District,” *id.* at 26a; see *id.* at 9a (court of appeals observing that “where the NPA is not silent, the agreement’s scope is *expressly limited* to the Southern District of Florida”). The NPA’s coconspirators clause, which “also agrees” to forgo certain prosecution of coconspirators, cannot reasonably be construed as reflecting some “global[]” scope broader than the Florida-based state and federal charges that Epstein resolved for himself. It would be extremely strange if the NPA left Epstein himself open to federal prosecution in another district—as eventually occurred, see p. 5, *supra*—while protecting his coconspirators from prosecution anywhere.

Contrary to petitioner’s claim, such an implausible reading cannot be inferred simply because the coconspirators clause is one of the places where “the United States” is used instead of “the United States Attorney” or “the United States Attorney’s Office.” As noted above, the NPA variously referred to the U.S. Attorney, the USAO, and the United States, and at least some of those uses of “the United States” plainly referred specifically to the USAO. See, *e.g.*, Pet. App. 26a (using terms interchangeably in paragraph on notice); *id.* at 30a (noting that Epstein had “agree[d]” “[a]t the United States’ request” to provide certain information); cf. *Kirtsaeng v. John Wiley & Sons, Inc.*, 568 U.S. 519, 540 (2013) (“different words used in different parts of the same statute [can] mean roughly the same thing”). The term

did not take on some unique broader meaning in the co-conspirators' clause. Cf. Antonin Scalia & Bryan A. Garner, *Reading Law: The Interpretation of Legal Texts* 170-173 (2012) (presumption of consistent usage).

Moreover, even if the meaning of the coconspirators clause were not clear in context, extrinsic evidence would resolve the ambiguity against petitioner. See *United States v. Gebbie*, 294 F.3d 540, 551 (3d Cir. 2002). At the time the NPA was negotiated, DOJ policy barred USAOs from entering into NPAs that bound other districts unless they obtained the approval of those districts or the Criminal Division. Pet. App. 10a. That policy reflects the longstanding general rule that a U.S. Attorney's area of responsibility is limited to "his district." 28 U.S.C. 547; see Pet. App. 11a-12a. While petitioner suggests (Pet. 18) that USAOs are instructed to be explicit on that point, they are also instructed to consult with other DOJ components if they intend to altogether foreclose any prosecution by other USAOs. See *Justice Manual* § 9-27.630. And there is no indication here that anyone involved in negotiating Epstein's NPA obtained the necessary approval for binding other USAOs or thought it was necessary. Pet. App. 10a.

b. Petitioner's contrary arguments (Pet. 12-18) lack merit. She invokes general principles that prosecutors should be held to the promises they make, see Pet. 13-14 (discussing *Santobello*, *supra*, and *Giglio v. United States*, 405 U.S. 150 (1972)), and that "ambiguities in a plea agreement are to be resolved against the government," Pet. 16. But those arguments merely beg the questions of what promises the NPA did make and whether the NPA is ambiguous. As explained above, the NPA's coconspirators clause, read in context, is not

reasonably susceptible to petitioner's broad interpretation.

Petitioner also invokes (Pet. 16-17) the interpretive principle *expressio unius est exclusio alterius*, in arguing that the NPA's "use of narrowing terms as to Epstein's protections" from prosecution indicates that the coconspirators clause, which does not contain those terms, was intended to apply to all districts. But the *expressio unius* canon "grows weaker with each difference in the formulation of the provisions under inspection." *City of Columbus v. Ours Garage & Wrecker Serv., Inc.*, 536 U.S. 424, 436 (2002); see *Chevron U.S.A. Inc. v. Echazabal*, 536 U.S. 73, 81 (2002) ("The canon depends on identifying a series of two or more terms or things that should be understood to go hand in hand, which is abridged in circumstances supporting a sensible inference that the term left out must have been meant to be excluded."). And the canon therefore does little work in this case.

The relevant portions of the NPA do not have any sort of parallelism in their wording or structure that would suggest the necessity for identical terminology on this particular point. Compare, *e.g.*, Pet. App. 26a ("prosecution [of Epstein] in this District for these offenses shall be deferred in favor of prosecution by the State of Florida"), with *id.* at 31a ("the United States also agrees that it will not institute any criminal char[g]es against any potential co-conspirators of Epstein"). Indeed, as noted above, the phrasing of the coconspirators clause—in which "the United States *also* agrees" to forgo certain prosecution of coconspirators, *id.* at 31a (emphasis added)—plainly uses "the United States" in reference to the entity otherwise making the agreement

(the USAO) and the corresponding geographic limitations of that agreement, as reflected in its promises regarding the prosecution of Epstein himself.

Petitioner's remaining arguments are likewise misplaced. Her effort (Pet. 15-16) to link the coconspirators clause with other NPA provisions addressing potential civil suits under 18 U.S.C. 2255 (2006) is self-defeating, since the latter provisions reinforce the NPA's limitation to the Southern District of Florida. See Pet. App. 28a (providing that "Epstein will not contest the jurisdiction of the United States District Court for the Southern District of Florida" in such suits). Similarly unavailing is petitioner's emphasis (Pet. 17) on language in one draft of the NPA that would have expressly limited the coconspirators' protection to the Southern District of Florida. See Pet. App. 117a. There is no indication that anyone involved in drafting the NPA understood the different versions of the coconspirators clause to have different geographic scopes. See *id.* at 122a-123a; see also *id.* at 125a n.125 (former First Assistant U.S. Attorney telling DOJ investigators that "the NPA was not a 'global resolution' and other co-conspirators could have been prosecuted 'by any other U.S. Attorney's office in the country'" (brackets omitted)). As the district court explained, an NPA "need not painstakingly spell out 'the Office of the United States Attorney for Such-and-Such District' in every instance to make clear that it applies only in the district where signed." *Id.* at 56a-57a.

At all events, the case-specific interpretation of a particular NPA is not a matter that warrants this Court's review. See Sup. Ct. R. 10. And that is especially true where "district court and court of appeals are in agreement as to what conclusion the record requires."

Kyles v. Whitley, 514 U.S. 419, 456-457 (1995) (Scalia, J., dissenting) (citing *Graver Tank & Mfg. Co. v. Linde Air Prods. Co.*, 336 U.S. 271, 275 (1949)).

2. Petitioner nevertheless urges (Pet. 7-12) the Court to grant a writ of certiorari in this case to resolve asserted disagreement in the courts of appeals over how broadly references to “the United States” or “the government” in a plea agreement should be read. That contention is likewise misplaced.

The Second and Seventh Circuits have stated that a promise regarding a defendant’s prosecution on behalf of “the government” or “the United States” by default “binds only the office of the United States Attorney for the district in which the plea is entered unless it affirmatively appears that the agreement contemplates a broader restriction.” *United States v. Annabi*, 771 F.2d 670, 672 (2d Cir. 1985) (per curiam); see *Rourke*, 74 F.3d at 807 & n.5 (7th Cir.). And in the Third, Fourth, and Eighth Circuits, “when a United States Attorney * * * contracts on behalf of ‘the United States’ or ‘the Government’ in a plea agreement for specific crimes, that attorney speaks for and binds all his or her fellow United States Attorneys * * * absent express contractual limitations or disavowals to the contrary.” *Gebbie*, 294 F.3d at 550 (3d Cir.); see *United States v. Carter*, 454 F.2d 426, 428 (4th Cir. 1972) (en banc), cert. denied, 417 U.S. 933 (1974); *United States v. Van Thournout*, 100 F.3d 590, 594 (8th Cir. 1996).²

² Petitioner appears to acknowledge (Pet. 10-11) that the Ninth Circuit has not expressly addressed the matter at issue here. In *Thomas v. Immigration & Naturalization Service*, 35 F.3d 1332 (1994), a cooperation agreement “plainly and unambiguously * * * bound the INS,” *id.* at 1337, so no need existed to address a more

Any disparity, however, is of limited importance because the scope of a plea or similar agreement is under the control of the parties to the agreement. See *Gebbie*, 294 F.3d at 550 n.4. Accordingly, as the court of appeals cases cited in the petition for a writ of certiorari indicate, cases in which a default inference proves to be dispositive are unlikely to arise frequently. Indeed, several of the cited cases did not themselves require application of any default rule because the scope of the relevant agreement was clear. See, e.g., *Margalli-Olvera v. Immigration & Naturalization Serv.*, 43 F.3d 345, 352 (8th Cir. 1994); see also *Rourke*, 74 F.3d at 807. And for the reasons discussed above, this is not itself a case that turns on any default rule.

Even assuming that “the United States” were presumptively a reference to the entire federal government, the scope of the NPA’s coconspirators clause would nonetheless be clear. See Pet. App. 12a (court of appeals finding “[n]othing in the text of the NPA or its negotiation history” to support petitioner’s claim); *id.* at 57a (district court describing petitioner’s reading as “not plausible—let alone ‘affirmatively apparent’”) (quoting *Annabi*, 771 F.2d at 672); pp. 8-12, *supra*. This Court does not grant certiorari to “decide abstract questions of law * * * which, if decided either way, affect no right” of the parties. *Supervisors v. Stanley*, 105 U.S. 305, 311 (1882). And it has declined to do so in the face of a claim similar to petitioner’s. See *Prisco*, 562 U.S. at 1290; Br. in Opp. at 6, *Prisco*, *supra* (No. 10-7895) (explaining that “when read in context, the prosecutor’s

general methodological question. The same was true in *United States v. Johnston*, 199 F.3d 1015 (9th Cir. 1999), cert. denied, 530 U.S. 1207 (2000), where a plea agreement explicitly bound only the USAO. See *id.* at 1021.

reference to ‘the government’ [at a plea hearing] clearly referred to only the United States Attorney for the District of New Jersey”).

3. Indeed, this case would be an unsuitable candidate for further review for additional reasons as well. First, unlike the defendants in the cases cited in the petition for certiorari, petitioner was not a party to the relevant agreement; only Epstein and the Florida USAO were parties to the NPA. Even assuming that a third party could assert rights under such an agreement with the government, but see *United States v. Lopez*, 944 F.2d 33, 37 (1st Cir. 1991) (noting the absence of “authority to that effect”), petitioner could do so here only if “the original parties intended the contract to directly benefit [her] as [a] third part[y],” *United States v. Andreas*, 216 F.3d 645, 663 (7th Cir.), cert. denied, 531 U.S. 1014 (2000); see *Astra USA, Inc. v. Santa Clara County*, 563 U.S. 110, 117 (2011). But there is no evidence that the parties to the NPA intended for the coconspirators clause to benefit petitioner. See p. 4, *supra*. The government was not even aware of petitioner’s role in Epstein’s scheme at that time. See Pet. App. 125a-126a.

Second, even if the Florida USAO had purported to bind all other USAOs in the NPA, it would have lacked authority to do so. See *General Int. Ins. Co. v. Ruggles*, 25 U.S. (12 Wheat.) 408, 413 (1827) (“It is a general rule applicable to agencies of every description, that the agent cannot bind his principal, except in matters coming within the scope of his authority.”). Under DOJ policy at the time the Epstein NPA was entered, a USAO could bind other districts in an NPA only if it obtained the approval of those districts or the Criminal Division. Pet. App. 10a. The USAO here did not do so. *Ibid.* And

petitioner cannot make up for the absence of actual authority by invoking principles of estoppel or apparent authority against the government. See *Federal Crop Ins. Corp. v. Merrill*, 332 U.S. 380, 384 (1947). That is particularly true where she is, at most, an incidental third-party beneficiary of the agreement.

CONCLUSION

The petition for a writ of certiorari should be denied.

Respectfully submitted.

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JULY 2025

No. 24-1073

IN THE SUPREME COURT OF THE UNITED STATES

GHISLAINE MAXWELL, PETITIONER

v.

UNITED STATES OF AMERICA

CERTIFICATE OF SERVICE

It is hereby certified that all parties required to be served have been served with copies of the **BRIEF FOR THE UNITED STATES IN OPPOSITION**, via email and first-class mail, postage prepaid, this 14th day of July 2025.

[See Attached Service List]

As required by Supreme Court Rule 33.1(h), I certify that the document contains **4,178** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed on **July 14, 2025**.

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July 14, 2025

Due to the continuing delay in receiving incoming mail at the Department of Justice, in addition to mailing your brief via first-class mail, we would appreciate a fax or email copy of your brief. If that is acceptable to you, please fax your brief to Charlene Goodwin, Supervisor, Case Management, Office of the Solicitor General, at (202) 514-8844, or email at **SupremeCtBriefs@USDOJ.gov**. Ms. Goodwin's phone number is (202) 514-2217 or 2218. Thank you for your consideration of this request.

No. 24-1073

IN THE
Supreme Court of the United States

GHISLAINE MAXWELL, AKA SEALED DEFENDANT 1,
Petitioner,
v.
UNITED STATES OF AMERICA,
Respondent.

**On Petition for Writ of Certiorari to the
United States Court of Appeals
for the Second Circuit**

**REPLY IN SUPPORT OF
PETITION FOR WRIT OF CERTIORARI**

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REASONS FOR GRANTING THE PETITION

This case presents a straightforward and important question about the government's obligation to honor its promises in plea and non-prosecution agreements. The petition asks whether a U.S. Attorney's promise made on behalf of "the United States" binds the entire United States. The government's Brief in Opposition only underscores the importance of this question.

Most significantly, the government concedes a circuit split on this issue, effectively admitting that defendants' rights hinge on the happenstance of geography. Opp.13. Such an acknowledged conflict among the circuits demands this Court's intervention.

Rather than grapple with the core principles of plea agreements, the government tries to distract by reciting a lurid and irrelevant account of Jeffrey Epstein's misconduct. But this case is about what the government promised, not what Epstein did.

Even more remarkably, the government advances an interpretation of its non-prosecution agreement that flips its plain meaning on its head. Promising "not to prosecute" somehow meant preserving the right to prosecute. That is not contract interpretation; it is alchemy. Plea agreements are supposed to be strictly construed against the government, yet here the government isn't even asking for the benefit of the doubt; it is asking for a blank check to rewrite its own promise after the fact. The government's only real argument is that the Second Circuit rule is correct on the merits while the other circuits have it wrong. We obviously disagree, but regardless, the Court should grant certiorari so that all circuits employ that same rule.

This circuit split presents an exceptionally important question. Plea and non-prosecution agreements resolve nearly every federal case. They routinely include promises that extend to others—co-conspirators, family members, potential witnesses. If those promises mean different things in different parts of the country, then trust in our system collapses. The Court should grant certiorari and restore consistency, and credibility, to the government’s word.

I. The government concedes that the circuits are split as to whether a promise on behalf of the “United States” by a United States Attorney’s office in one district is binding upon other districts.

The government (like the Second Circuit in the opinion below) agrees that there is a clear circuit split on the precise question posed by this Petition. Opp.13;¹ *United States v. Maxwell*, 118 F.4th 256, 263 n.11 (2d. Cir. 2024) (“recogniz[ing] that circuits have been split on this issue for decades.”). As the Second Circuit noted, this conflict is well-documented and longstanding. Indeed, the government points out that litigants have sought the Court’s clarification of this issue at least as far back as 2011, when this Court denied certiorari in *Prisco v. United States*, 562 U.S. 1290 (2011), No. 10-7895.

¹ The United States argues that the split is 3-2 in favor of Petitioner, not 4-2, claiming that the “Ninth Circuit has not expressly addressed the matter at issue here.” Opp.13. While not express, the Ninth Circuit is pretty clear that it agrees with Petitioner’s position, holding that a U.S. Attorney can bind other districts and agencies, *Thomas v. INS*, 35 F.3d 1332 (9th Cir. 1994), and when in doubt, “the government must bear responsibility for any lack of clarity in those terms,” *United States v. Johnston*, 199 F.3d 1015, 1020 (9th Cir. 1999).

The government seeks to minimize the split as of “limited importance” because “the scope of a plea or similar agreement is under the control of the parties to the agreement.” Opp.14. This turns a blind eye to the problem. The very premise of Petitioner’s argument is that the parties to the NPA *did* seek to control the scope of the relevant clauses by narrowing the scope of immunity for Epstein through the use of narrow language specifying enforceability only in the Southern District of Florida, and then expanding the scope of it as to his co-conspirators by using the broad term “the United States.” (App. 30-31). While doing so, Epstein’s lawyers were no doubt informed by how that language was interpreted in the jurisdiction in which they were practicing.

Yet by definition, the issue presented in this case and every other like it *only* arises when the language in question is being interpreted in a *different* jurisdiction than the one where the agreement was negotiated. Accordingly, uniformity in interpretation of such a provision is unusually and particularly compelling. The very nature of a clause of this nature (unlike most other clauses in an agreement, which are not cross-jurisdictional in nature) cries out for nationwide symmetry.

The government also contends, rather bizarrely, that “this is not itself a case that turns on any default rule.” Opp.14. To the contrary, it is *precisely* the Second Circuit’s default rule, adopted in *United States v. Annabi*, 771 F.2d 670 (2d Cir. 1985), that doomed Petitioner to stand trial on a case that would have been dismissed outright in at least half the country. The primary reason this Court should grant certiorari is to create one single default rule across the country as to

what parties mean when they use the term “the United States” without further qualification.

II. The Second Circuit’s decision below is wrong and violates the principles set forth in this Court’s prior opinions.

In attempting to defend the Second Circuit’s outcome, the government advances a series of contentions about the Epstein NPA’s scope, the U.S. Attorney’s authority, contract law doctrines, and canons of construction. Each lacks merit.

As the government acknowledges, Opp.8, the starting point in any contract is the text. Here, the text could not be more clear. In exchange for Epstein’s guilty plea and other penalties and concessions, “the United States also agrees that it will not institute any criminal charges against any *potential* co-conspirators of Epstein, *including but not limited to* [four names].” (emphasis added).

This promise is unqualified. It is not geographically limited to the Southern District of Florida, it is not conditioned on the co-conspirators being known by the government at the time, it does not depend on what any particular government attorney may have had in his or her head about who might be a co-conspirator, and it contains no other caveat or exception. This should be the end of the discussion. *See Santobello v. New York*, 404 U.S. 257 (1971) (“[W]hen a plea rests in any significant degree on a promise or agreement of the prosecutor, so that it can be said to be part of the inducement or consideration, such promise must be fulfilled.”) (ignored by the government in its opposition).

The government seeks to evade this straightforward language by focusing on other clauses in the NPA and on extrinsic context, Opp.8-10, but its efforts only

underscore that the plain meaning favors Petitioner. First, the government notes (as did the Second Circuit) that the NPA explicitly limited Epstein's own immunity to the Southern District of Florida, pointing to a clause stating that after Epstein fulfilled the agreement, "no prosecution for the offenses set out on pages 1 and 2 of this Agreement... will be instituted *in this District*." (App. 26a). The government then urges the Court to follow it through the looking glass, offering the inexplicable suggestion that the absence of a similar "in this District" qualifier in the co-conspirator clause should be ignored as immaterial. Opp.9.

Of course, basic interpretive canons point in exactly the opposite direction. When parties include an express territorial limitation in one clause of a contract and omit it in another, the omission must be presumed intentional. Antonin Scalia & Bryan A. Garner, *Reading Law: The Interpretation of Legal Texts* (2012). As Justice Scalia and Bryan Garner have explained, "a material variation in terms suggests a variation in meaning." *Id.* at 170. Here, the drafters knew how to confine the promise to a single district – they did so for Epstein's personal non-prosecution assurance. Yet when it came to Epstein's "potential co-conspirators," the drafters chose broad, unqualified language. In fact, not only did the parties use an unrestricted jurisdictional clause for the co-conspirators, they amended the document from a previous draft in which the co-conspirator immunity was limited to the Southern District of Florida, changing it to refer more broadly to the "United States." (Pet. 3; App. 95, 108-126).

The government's interpretation cannot be correct because it would render superfluous the phrase "in this District" in the Epstein clause. If the "United States" means just the Southern District of Florida,

why specify the district for Epstein? The only logical inference is that the co-conspirator promise was meant to reach more broadly, in line with its different phrasing.² At the *very* least there is a textual ambiguity, and under *Santobello* and the contract interpretation principle *contra proferentum*, such ambiguity must be construed against the government as the drafter and promisor. See, e.g., *United States v. Carmichael*, 216 F.3d 224 (2d Cir. 2000) (“[W]e ‘construe plea agreements strictly against the Government.’”) (internal citation omitted); OPR report (“OPR”) at 80, 166 (confirming that AUSA wrote the specific language in question). Under any normal reading of this contract, then, no federal charges can be brought against any co-conspirator in any district in the United States.

Reading the NPA “as a whole” means giving effect to the deliberate difference in phrasing between the Epstein-focused clause and the co-conspirator clause.³

² It is not, as the government contends, “extremely strange” for Epstein to have secured broader immunity for his co-conspirators than he was getting for himself, Opp.9. Defendants always try to get as many benefits in a plea agreement as they can – here, Epstein was able to obtain an additional benefit for his co-conspirators that he was unable to secure for himself, no doubt because the government attorneys “wouldn’t have been interested in prosecuting anyone else.” OPR:70; *see also* OPR:80, 168. Epstein “wanted to make sure that he’s the only one who takes the blame for what happened.” OPR:167 (internal quotation omitted). In addition, Epstein was concerned that if a co-conspirator was charged elsewhere, he might be called to testify, opening him up to potential charges in a different part of the country. This was antithetical to the global resolution Epstein sought.

³ The government is right about one thing: the scope of a particular agreement *is* under the control of the parties. Opp.14. As the National Association of Criminal Defense Lawyers observes in its *amicus* brief, federal prosecutors know well how to draft

It means recognizing that when the parties intended to mean “only in the Southern District of Florida,” they said so explicitly, and that their use of the all-encompassing term “the United States” in the co-conspirator clause was purposeful.

The government’s invocation of “context” and the purported purpose of the NPA is no more persuasive. The government suggests that a broad grant of immunity cannot have been made because there was no consultation with the Southern District of New York. Opp.10. The record does not permit such a conclusion, as the district court denied a hearing and the Petitioner was not granted any discovery, so there is no way to confirm who was consulted. But the record is clear in any event that the NPA was signed on behalf of the United States Attorney for the Southern District of Florida, who was heavily involved in the negotiation and approval process. In addition, representatives of the Department of Justice were also actively involved in the drafting and approval process, including the Chief of the Child Exploitation and Obscenity Section and the Principal Deputy Assistant Attorney General for the Department’s Criminal Division. OPR:27, 28, 84.

If these officials failed to do what their internal policy suggested was appropriate, it is irrelevant. The provision in the U.S. Attorneys’ Manual advising U.S. Attorneys not to bind other districts was relevant in OPR’s review of the government attorneys’ actions in this case. It does not inform the outcome here, however, despite the government’s heavy reliance on it

agreements to limit their scope when that is what they intend, and the burden is on them to be specific. When they decline to use simple narrowing terms, this Court should make clear that the broad language they use will be given its ordinary meaning.

throughout its brief. What a prosecutor *should* have done is not relevant; whether or not the Southern District of Florida *should* have prohibited the Southern District of New York from prosecuting Ghislaine Maxwell, it clearly did so.

Nor can the government's appeal to context exclude Petitioner from the clear "including but not limited to" language which unmistakably signaled an intent to cover *all* "potential coconspirators," not just those who were specifically named. Indeed, the broad "including but not limited to" clause shows the parties contemplated both known and unknown accomplices, and it was the government who drafted in the "final broad language," intentionally declining to further enumerate individuals. OPR:70,166. The purpose was to assure Epstein that pleading guilty would protect all his associates from federal prosecution⁴ – effectively "closing" the federal case completely.⁵ That purpose is perfectly consistent with the plain text; it is the government's after-the-fact spin that is inconsistent,

⁴ The government cherry picks snippets of testimony from the OPR report, many of which are inconsistent with other statements from the same government attorneys, or which offer the perspective of those who admitted to unclear memories, or who were on vacation or otherwise disengaged at the relevant time. App.108, OPR: 36-37. There was a lengthy back-and-forth negotiating process to the inclusion of this clause, some of it recorded by the OPR report, some not. See OPR:36. None of this is relevant; the document says what it says in plain language, so the after-the-fact and self-serving statements of various participants to the process should be ignored.

⁵ The OPR is riddled with statements reflecting that the government was very concerned about the strength of its case, that it had doubts it would result in a guilty verdict, and that many of the alleged victims did not want any aspect of the case to go to trial. See, e.g., OPR:28, 29, 36, 37, 14, 147.

attempting to import unwritten limits that the deal-makers did not include.

The government's argument, across the board, is essentially an appeal to what it wishes the agreement had said, rather than what it actually says. Of course, if wishful thinking were the standard, the whole NPA would have been thrown out long ago. The government has spent years lamenting that agreement, and initiated a massive OPR investigation into its execution which resulted in OPR's conclusion that the attorneys who negotiated it on behalf of the government did many things contrary to internal government policy and typical practice. (App.55) (district court order noting OPR's findings that the NPA was "unusual in many respects, including its breadth, leniency, and secrecy."); *see also, e.g.*, App. 99.

The entire co-conspirator provision itself (putting aside the issue of the jurisdiction(s) in which it is enforceable) was, according to OPR, unusual for such an agreement (App. 125). But, as the *amicus* notes, the fact that the deal was unconventional does not license the government (or the courts) to rewrite it to conform to ordinary or preferred governmental practice. Amicus Br. 5. To the contrary, it underscores that Epstein's negotiators sought, and obtained, an expansive guarantee.

The government also suggests that Petitioner is not entitled to enforce the NPA because she was not a party to it and was not named in it. Opp.15. But as the court below recognized and as hornbook contract law dictates, Maxwell has standing to enforce the agreement as a third party beneficiary. App.10. Petitioner falls squarely within the class of persons – "any potential co-conspirators of Epstein" – that the NPA expressly protected. She is therefore an intended beneficiary of the agreement, and she has standing to enforce it.

See, e.g., United States v. Andreas, 216 F.3d 645, 663 (7th Cir. 2000) (providing that individuals who are not parties to a plea agreement may enforce it, like other third-party beneficiaries, when the original parties intended the contract to directly benefit them as third parties).

Petitioner's alleged status as Epstein's co-conspirator was the entire basis of her prosecution. The NPA's language demonstrates that the parties anticipated that there were additional co-conspirators beyond those already known. By using "including but not limited to" before naming some individuals, the government knowingly extended the benefit of the bargain to other unnamed individuals who participated in Epstein's offenses. Whether the government attorneys personally knew the identities of every such person is beside the point; they certainly knew there could be others (hence the language). Ghislaine Maxwell's name was well known to Epstein's circle and was referenced in public reporting at the time of the NPA. But even if she had been entirely unknown, the broad language of the NPA evidences an intent to cover whoever might later be deemed a co-conspirator. Accordingly, Petitioner can rely on the immunity clause in the NPA. *See, e.g., United States v. Florida West Int'l Airways*, 853 F.Supp.2d 1209, 1228 (S.D. Fla. 2012) (dismissing indictment against employee who fell within the class of employees described in plea agreement).

The government's suggestion that it would have drafted the agreement differently had it specifically had Petitioner in mind is both unprovable and irrelevant. If anything, the inclusion of specific names alongside a general category shows the parties knew some of the players and also wanted to cover any

others to prevent any federal prosecution of Epstein's circle. Whether or not this was wise, it was the deal, and Petitioner is entitled to enforce it.

III. This case is an ideal vehicle for resolving the split over this important and recurring question.

It is hard to imagine a more compelling scenario for this Court's review: for decades now, the same federal promise has yielded opposite results in different jurisdictions, undermining the uniformity of federal law and the integrity of plea bargains nationwide. This Court's review is warranted.

CONCLUSION

For the foregoing reasons, this Court should grant the petition for certiorari.

Respectfully submitted,

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July 28, 2025



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No. 24-1073

GHISLAINE MAXWELL, AKA SEALED DEFENDANT 1,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that on July 28, 2025, three (3) copies of the REPLY IN SUPPORT OF PETITION FOR WRIT OF CERTIORARI in the above-captioned case were served, as required by U.S. Supreme Court Rule 29.5(c), on the following:

D. JOHN SAUER
Solicitor General
U.S. DEPARTMENT OF JUSTICE
950 Pennsylvania Avenue NW
Washington, DC 20530
(202) 514-2217

Counsel for United States of America

The following email addresses have also been served electronically:

supremectbriefs@usdoj.gov

dmarkus@markuslaw.com

ROBYN DORSEY WILLIS
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1115 H Street, N.E.
Washington, D.C. 20002
(202) 789-0096

Sworn to and subscribed before me this 28th day of July 2025.



AZA SALINDER DONNER
NOTARY PUBLIC
District of Columbia

My commission expires April 30, 2029.

No. 24-1073

IN THE
Supreme Court of the United States

GHISLAINE MAXWELL, AKA SEALED DEFENDANT 1,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

**On Petition for Writ of Certiorari to the
United States Court of Appeals
for the Second Circuit**

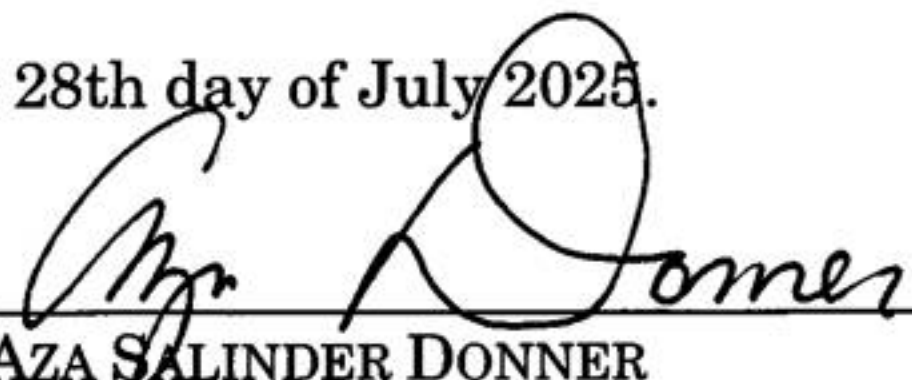
**REPLY IN SUPPORT OF
PETITION FOR WRIT OF CERTIORARI**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,978 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sworn to and subscribed before me this 28th day of July 2025.



AZA SALINDER DONNER
NOTARY PUBLIC
District of Columbia

My commission expires April 30, 2029.



French, 2017 WL 27932, at *2 (D. Me. Jan. 3, 2017) (“the authority that would allow the Court to seal the memoranda submitted [in support of a motion for a new trial] is extremely restricted . . . the Court concludes that the Defendants’ hypothetical strategic concerns must bend to the presumptive public right of access”); cf. CBS, Inc. v. U.S. Dist. Ct. for Cent. Dist. Of California, 765 F.2d 823, 825 (9th Cir. 1985) (holding, in context of post-conviction motion to reduce sentence, that there is “no principled basis for affording greater confidentiality to post-trial documents and proceedings than is given to pretrial matters. The primary justifications for access to criminal proceedings . . . apply with as much force to post-conviction proceedings as to the trial itself”).

Significantly, courts have held that this is true even where the post-trial proceedings in question relate to alleged juror misconduct. United States v. Simone, 14 F.3d 833, 840 (3d Cir. 1994) (“We hold that the First Amendment right of access attaches to post-trial hearings to investigate jury misconduct”); United States v. Leeco, 2009 WL 1249295, at *2 (S.D.W. Va. May 5, 2009) (denying government request for redactions to memorandum opinion and order granting motion for new trial based on alleged juror misconduct and holding that “the subject juror’s privacy interests must yield to the general public’s right to know all facts bearing upon the necessity for a new trial”).

Here, the public interest in Ms. Maxwell’s effort to obtain a new trial is manifest. In light of the strong presumption of openness that attaches to the documents in question and the lack of any apparent overriding interest in keeping them secret, the *Daily News* respectfully requests that the documents be unsealed.

Sincerely,

/s/ Matthew A. Leish

Matthew A. Leish

Attorney for Daily News, L.P.

cc: counsel for all parties (via email)

and former principals, officers, directors, stockholders, managers, members, partners, limited partners, trustees, beneficiaries, administrators, agents, employees, attorneys, predecessors, successors, assigns and affiliates, and any entities or individuals who are or have ever been engaged by (whether as independent contractors or otherwise), employed by, worked in any capacity for, or provided any services to Mr. Epstein, the Epstein Entities or the Epstein Estate (jointly and severally, the "Releasees"), from any and all claims, demands, actions, causes of action, suits, debts, dues, sums of money, accounts, variances, trespasses, damages and judgments, whether sounding in equity, tort, common law, contract, statute, regulation or otherwise and whether now existing, hereafter existing or revived in the future whatsoever in law, admiralty, equity or otherwise, including without limitation any and all claims or causes of action that arise or may arise from or which otherwise concern acts of sexual abuse by Mr. Epstein (the "Claims") which against the Releasees, Releasor ever had, now has or hereafter can, shall or may have, for, upon, or by reason of any matter, cause or thing whatsoever from the beginning of the world through the date of this General Release.

This General Release is a broad release of any and all Claims of Releasor against any and all Releasees, including without limitation any and all causes of action, lawsuits, claims, demands, damages and liability whatsoever, and also including without limitation to the extent of their respective liability for the same, any and all such claims against any and all Releasees for contribution as to any other person or persons who may be determined to have been joint tortfeasors arising out of or in any way related to any and all known and unknown personal injuries, and also including without limitation any derivative claims for loss of consortium, under any federal, state or local law, without limitation. This General Release is all-encompassing and is specifically made and given on the premise that any and all Claims by Releasor are hereby released and extinguished, whether said Claims arose in Florida, New Mexico, New York, the United States Virgin Islands, France or any other country, state, territory, possession or jurisdiction, or otherwise.

This General Release extends to released Claims that Releasor does not know or suspect to exist in her favor, which, if known by Releasor, would have materially affected her decision to enter into this General Release, and Releasor understands and agrees that she is releasing any and all such unknown or unsuspected Claims in Releasees' favor. Releasor acknowledges that she is familiar with Section 1542 of the California Civil Code, which provides as follows:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN

HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY.

Releasor expressly waives and relinquishes any right or benefit that Releasor has or may have under Section 1542 of the California Civil Code and under any other statute or legal principle with similar effect. In connection with such waiver and relinquishment, Releasor acknowledges that she is aware that, after executing this General Release, Releasor or Releasor's attorneys or agents may discover released Claims or facts in addition to, or different from, those which they now know or believe to exist with respect to the subject matter of this General Release, but that it is Releasor's intent hereby to fully, finally and forever settle and release all of the Claims, whether known or unknown, suspected or unsuspected, which now exist, may exist, or heretofore may have existed. In furtherance of this intent, this General Release shall be, and remain in effect as, a full and complete release of the Claims notwithstanding the discovery or existence of any such additional or different Claims or facts.

The Administrator of the EVCP has retained Garretson Resolution Group, Inc. d/b/a Epiq Mass Tort ("Epiq") to verify and resolve any lien or reimbursement claim that may be owed to Medicare Part A and/or Part B ("Medicare") and/or Medicaid with respect to compensation awarded to any participating claimant under the EVCP. If either entity asserts a lien or reimbursement claim, Epiq is hereby authorized to act on behalf of the EVCP to verify and resolve such lien or reimbursement claim. In the Claim Form, Releasor authorized the Administrator to use and/or disclose information as to Releasor for the resolution of Medicare and/or Medicaid liens. This includes providing to Epiq certain information as to Releasor, including: (1) first name, last name and middle initial, (2) Social Security number; (3) date of birth, (4) gender and (5) basic information regarding the nature of Releasor's Claims, and authorizing the Administrator and Epiq to use, exchange and report this information to Medicare and Medicaid, as may be necessary, for purposes of verifying and resolving Medicare and/or Medicaid liens and/or reimbursement claims and ensuring compliance with the Medicare Secondary Payer Act, 42 U.S.C. § 1395(y)(b), and its accompanying regulations. In the event that Epiq resolves the asserted claim or lien, the Epstein Estate will pay the negotiated amount in addition to any Compensation Offer determined by the Administrator.

Releasor represents and acknowledges that she is voluntarily and freely granting this General Release in exchange for payment of the Compensation Offer, and that she is legally competent to execute and deliver this General Release. Releasor further represents that she is represented by legal counsel and has received legal advice prior to

entering into this General Release and that she has been advised by said attorney regarding the terms and conditions of this General Release, which she has completely read and fully understands, including that accepting the Compensation Offer and signing this General Release is a full and final compromise, adjustment and resolution of any and all Claims that Releasor may now have or ever will have against Releasees.

Pursuant to the EVCP Protocol, the Administrator will maintain the confidentiality of all information and documentation relating to claimants who participate in the EVCP Program. This General Release does not require participating claimants to maintain such confidentiality and Releasor may – at Releasor’s voluntary and sole option – disclose such information regarding the claims process and/or the Compensation Offer and any other information pertaining to her claim.

This General Release specifically does not include _____ as a Releasee or released party under this Agreement, and all parties expressly acknowledge, agree and understand that any and all claims that Releasor has or may have against _____ are expressly preserved.

Releasor represents and warrants that she has not assigned any Claims released pursuant to this General Release.

Releasor will dismiss with prejudice any and all legal actions – whether lawsuits, probate claims or otherwise – that Releasor has filed against any of Releasees, with each party to bear her, his or its own costs and attorneys’ fees and will submit proof of dismissal to the Administrator along with or prior to the signed acceptance of the Compensation Offer and this executed Release.

This General Release contains the entire understanding of the Releasor and the Co-Executors of the Epstein Estate. Any modification of any of the provisions of this General Release shall be effective only if made in writing and executed by Releasor and the Co-Executors of the Epstein Estate with the same formality as this General Release.

COUNT I

5. Plaintiff incorporates into this count the allegations of paragraphs 1 through 3.
6. On numerous occasions while the Plaintiff was a minor, beginning when she was fourteen, the defendant, JEFFREY EPSTEIN intentionally induced and/or seduced the Plaintiff into performing various acts of lewd and lascivious conduct and/or sexual performances in his presence. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
7. On numerous occasions while the Plaintiff was a minor, the defendant, JEFFREY EPSTEIN performed various acts of lewd and lascivious conduct in the presence of the Plaintiff. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
8. On numerous occasions while the Plaintiff was a minor, the defendant, JEFFREY EPSTEIN touched the Plaintiff's breasts and genitalia. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
9. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGMENT FOR DAMAGES AGAINST JEFFREY EPSTEIN, IN AN AMOUNT IN EXCESS OF FIFTEEN THOUSAND DOLLARS, EXCLUSIVE OF COSTS AND INTEREST, AND FURTHER DEMANDS TRIAL BY JURY.

COUNT II

10. Plaintiff incorporates into this count the allegations of paragraphs 1 through 4, and paragraphs 6 through 9.

11. For each and every occurrence of sexual abuse of the Plaintiff while she was a minor for which JEFFREY EPSTEIN was responsible, he was aided, assisted, and/or abetted by SARAH KELLEN, who lived at the Palm Beach mansion of JEFFREY EPSTEIN. Said acts included, but were not limited to, the following:
- a. She often called the Plaintiff, when the Plaintiff was a minor, to arrange for the Plaintiff to come to the Palm Beach mansion of JEFFREY EPSTEIN, for the ostensible purpose of providing "massages" to JEFFREY EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy.
 - b. She observed the Plaintiff being brought to the Palm Beach mansion of JEFFREY EPSTEIN, when the Plaintiff was a minor, and sometimes escorted the Plaintiff to a room in that mansion where JEFFREY EPSTEIN was waiting, for the ostensible purpose of providing "massages" to JEFFREY EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy.
 - c. She sometimes paid the Plaintiff for the "sessions" with JEFFREY EPSTEIN.
 - d. She made telephone calls to the Plaintiff, when the Plaintiff was a minor, to arrange for gifts to be sent to the Plaintiff.
 - e. She took photographs of the Plaintiff, when the Plaintiff was a minor, which depicted the Plaintiff in the nude. She told the Plaintiff that the pictures were at the request of JEFFREY EPSTEIN, and paid the Plaintiff for posing for the photographs.
12. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGMENT FOR DAMAGES AGAINST SARAH KELLEN, IN AN AMOUNT IN EXCESS OF FIFTEEN THOUSAND DOLLARS, EXCLUSIVE OF COSTS AND INTEREST AND FURTHER DEMANDS TRIAL BY JURY.

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 Lake Worth, FL 33461
 Telephone: (561) 582-7600
 FAX: (561) 588-8819

By: 

RICHARD H. WILLITS
 Florida Bar No.: 139888

7/19/2021

Days Absent

Next Year EduChoice IN HOME (SAC) SCHOOL

Student Info

Days Absent (Unex Not
Discipline)

EduChoice Duration N/A

jcsheppard.com

Pi Mu Epsilon, National Mathematics Honorary, elected 1965
 Mortar Board, National Senior Women's Honorary, elected 1965
 Elected, Golden Key International Honour Society, honorary member, 2005

Fellowships

Office of Education Traineeship, Stanford University, 1966-69
 National Institute of Mental Health Fellowship, Stanford University, 1969-70
 American Council on Education Fellowship in Academic Administration, Harvard University, 1975-76
 Fellow, Center for Advanced Study in the Behavioral Sciences, Stanford, 1978-79

Grants, Contracts, Research Funding

National Institute of Mental Health, 1971-72; 1972-73; 1976-79 (Human Memory)
 U.S. Department of Transportation, 1974-76 (Human Memory)
 General Services Administration, 1974-75 (Communications--w/Keating)
 National Bureau of Standards, 1976-77; 1980-82 (Communications--w/Keating)
 National Science Foundation, 1978-85 (Human Memory)
 National Science Foundation, 1980-83 (Jury Behavior--w/Severance)
 National Science Foundation, 1983-85; (Hypnosis--w/Greene)
 National Institute of Mental Health, 1984-86; 1986-89; 1989-92 (Memory)
 National Center for Health Services Research, 1986-88 (Survey Memory)
 National Science Foundation, 1986-88; 1988-91 (Jury Comprehension--w/Greene-Goodman)
 Fund for Research on Dispute Resolution, 1989-91 (Predictions of Success--w/Goodman)
 National Institute of Health, 1991-95 (Cognition & Health--w/Croyle)
 National Institute of Health, 1993-94 (Health/sex memory: subcontract from UCSF/Catania)
 Leverhulme Trust, Postevent info and erasing memories, 1997-1999 (w/ Dan Wright, Univ. of Bristol)
 Royal Society of Edinburgh, Travel Grant, 2006
 Grawemeyer Award Funding given to UCI, 2005-present.
 Newkirk Center for Science & Society, 2017-2019.

Awards & Honors

National Lecturer of Sigma Xi, 1978-80
 American Psychological Association nomination for the NSF Waterman Award for Outstanding Contributions to Science, 1977 and 1978
 National Media Award for *Eyewitness Testimony* (American Psychological Foundation, Distinguished Contribution, 1980)
 Greyhound Research Award, 1987-88
 Honorary Fellow, British Psychological Society, 1991 (includes lifetime membership)
 George E. Allen Professor, University of Richmond School of Law, 1995
 American Academy of Forensic Psychology, Distinguished Contributions to Forensic Psych Award, 1995
 American Association of Applied and Preventive Psychology (AAAPP), Distinguished Contribution to Basic and Applied Scientific Psychology Award, 1996
 Association for Psychological Science, James McKeen Cattell Fellow ("For outstanding lifetime contributions to the area of applied psychological research"), 1997
 Oklahoma Scholar Leadership Enrichment Program Scholar 2001
 Association for Psychological Science, William James Fellow Award, 2001 ("For significant lifetime intellectual contributions to the basic science of psychology.")
 Quad L Award (for "outstanding life-long contributions to our understanding of learning or memory processes" University of New Mexico) 2002
 National Academy of Sciences: Henry & Bryna David Lectureship, 2002 (inaugural award, for "application of the best social and behavioral sciences research to public policy issues") Speech delivered at NAS (2002). Article selected for inclusion in: *The Best American Science and Nature Writing*, (2003)
 Society for the Scientific Study of Sexuality (SSSS), Contributions to Sexual Science Award, 2002
 American Academy of Political and Social Sciences, elected Thorsten Sellin Fellow, 2003
 Distinguished Scientific Award for the Applications of Psychology, American Psychological Assn, 2003.

American Academy of Arts & Sciences, elected Fellow, 2003
 National Academy of Sciences, elected 2004.
 Grawemeyer Prize in Psychology (for “Outstanding Ideas in the Science of Psychology”), 2005
 Royal Society of Edinburgh, Corresponding Fellow (Scotland’s National Academy of Science & Letters, Est 1783). 2005
 Distinguished Member of Psi Chi (The National Honor Society in Psychology), 2005
 Lauds & Laurels, Faculty Achievement Award, University of California- Irvine, (for “great professional prominence in their field” in research, teaching and public service; 9th recipient in UCI history), 2005
 Ireland Distinguished Visiting Scholar Prize, 2006
 American Philosophical Society (U.S. oldest learned society, Est. 1745 by Benjamin Franklin), 2006
 International Academy of Humanism, elected Humanist Laureate, 2007 (for “outstanding contributions to science, law, and academic freedom, and to the public understanding of the human mind”)
 McGovern Award Lecture, “honors outstanding behavioral scientists from around the world.” American Assoc. for the Advancement of Science, 2009
 Distinguished Contributions to Psychology and Law, American Psychology-Law Society, 2009.
 Joseph Priestley Award (for “achievement in the sciences”), Dickinson College, October, 2009.
 Howard Crosby Warren Medal, Society of Experimental Psychologists – Est. 1904, (for “significant contributions to the understanding of the phenomenology of human memory, especially its fragility and vulnerability to distortion”) 2010
 American Association for the Advancement of Science Award for Scientific Freedom and Responsibility (for “the profound impact that your pioneering research on human memory has had on the administration of justice in the United States and abroad.”), for year 2010, ceremony Feb, 2011
 Forensic Mental Health Assn of California, William T. Rossiter Award (for “exceptional global contribution to the field of forensic mental health”), 2012.
 University of California, Irvine Medal (for “exceptional contributions to the vision, mission, and spirit of UC Irvine”) 2012
 Foundation for Critical Thinking, Bertrand Russell Scholar, 2013.
 Gold Medal Award for Life Achievement in the Science of Psychology. American Psychological Foundation. (for “extraordinary contributions to our understanding of memory during the past 40 years that are remarkable for their creativity and impact”) 2013.
 Cornell University: Law, Psychology & Human Development Lifetime Achievement Award (“In Recognition of a Distinguished Career of Pioneering Contributions in Legal Applications of Psychological Research”), 2015
 Isaac Asimov Science Award, American Humanist Association, 2016
 John Maddox Prize (for “promoting sound science and evidence on a matter of public interest, with perseverance and courage”), 2016
 Western Psychological Association, Lifetime Achievement Award (“in recognition of Outstanding Career Contributions to Research and Teaching”, 2018
 Albert Wolters Distinguished Visiting Professor (“in recognition of her world-class contributions to cognitive psychology”), University of Reading, 2018
 Ulysses Medal, University College Dublin, Ireland (“the highest honor bestowed by UCD”) 2018
 Lifetime Achievement Award for Psychology, Australian National University, (for “pioneering research on the science of human memory”) 2019
 American Philosophical Society’s Patrick Suppes Prize in Psychology, “in recognition of her demonstrations that memories are generally altered, false memories can be implanted, and the changes in law and therapy this knowledge has caused”, 2020
 International Union of Psychological Science, Lifetime Career Award, (for “distinguished and enduring lifetime contributions to advancing knowledge in psychology.”) 2021

Other Public Honors & Recognition

Committee for the Scientific Investigation of Claims of the Paranormal (CSICOP): “In Praise of Reason” Award, 1994 (Renamed: Committee for Skeptical Inquiry – C.S.I.)
 Sexual Sanity Award, Sexual Intelligence, 2001
OC Metro magazine selection as one of the “Hottest 25 People in Orange County for 2002”

Listed in One Hundred Most Eminent Psychologists of the 20th century. #58. *Review of General Psychology*, 2002.

University of Portsmouth (England) endowed a prize for the best research dissertation in their MSc Program in Forensic Psychology, naming it The Elizabeth Loftus Award, 2004.

"The false memory diet", "Most noteworthy ideas of 2005", New York Times Magazine, 2005.

University of Klagenfurt, Student Scientific Board selection- "Nobel Prize in Psychology", Austria, 2005.

Listed in Who's Who in America, Who's Who in Science and Engineering, Who's Who in American Education, Who's Who in Social Sciences Higher Education (WSSHE), World Who's Who of Women, and various others.

Bethschrift Redux: Research Inspired by the Work of Elizabeth F. Loftus Special Issue of *Applied Cognitive Psychology*, edited by M. Garry & H. Hayne, Vol. 20, 2006.

Fellow, German Skeptics Organization, GWUP, elected 2018

PROFESSIONAL MEMBERSHIPS

Current:

American Association for the Advancement of Science (Fellow; Board of Directors, 2013 - 2017)

Association for Psychological Science (Formerly American Psychological Society; President 1998-99)

Western Psychological Association (President, 1984; President 2004-2005)

Psychonomic Society (Governing Board, 1990-1995) Lifetime Member

Society of Experimental Psychologists, (1990 -)

British Psychological Society (1991, Lifetime Member)

National Academy of Sciences, (2004 -)

American Academy of Arts and Sciences (2003 -).

Royal Society of Edinburgh (2005 - Lifetime Corresponding Fellow)

American Philosophical Society (2006 -)

Past:

American Psychological Association (Fellow-Div. 3, 35, 41; President, American Psychology-Law Society, Div. 41, 1985; President, Experimental Psychology Division, Div. 3, 1988) (1973-1996)

Institute for the Study of the Trial (Board of Directors, 1979-81)

Law and Society Association (1982-89)

Eastern Psychological Assn, Elected Fellow 2011

OTHER PROFESSIONAL EXPERIENCE

Member, Psychology Education Review Committee, National Institute of Mental Health, 1977-79

Associate Editor, *American Psychologist*, 1990-94

Editorial Board Member:

Journal of Experimental Psychology, 1974-87

Human Learning, 1980-86

Social Cognition, 1981-92

Law and Society Review, 1982-86

Information and Behavior, 1983-90

American Journal of Psychology, 1989-2008

Justice Quarterly, 1984-95

Behavioral Sciences and the Law, 1985-99

Applied Cognitive Psychology 1987-93

(Special Editorial Advisor, 1993-)

Law and Human Behavior, 1980-2005

Ethics and Behavior, 1989-91

Forensic Reports, 1987-92

The Forensic Echo, 1998-2000

Psychology, Crime and Law, 1992-

Psych Science in the Public Interest, 1999-

Canadian Psychology 2001-

Perspectives on Psychological Science, 2005 - 2017

Internat. J of Psychology, Cons Ed, 2005 -12

Experimental Psychology, 2008 -

Psychology of Consciousness 2012 -

Memory, Mind & Media, 2021 -

Advisory Board Member:

British Journal of Psychology, 1983-99(approx)

Skeptic Magazine (UK), 2009 - present.

Member, Council for Scientific Medicine, *Scientific Review of Alternative Medicine*, 1998-

Psychology Today, 1999-2003

American Psychological Association committee work:

Member, Communications Committee, 1975-76; Member, Magazine Task Force, 1975-76;
Member, Finance Committee, 1976-78; Member, Comm. on Organization of APA, 1977-78;
Commission on Organization, 1978-82; Council of Representatives, Div. 3, 1982-85;
Executive Committee, Div. 41, 1981-85; Member, Ethics Committee, 1984; National
Policy Studies Oversight Committee, 1986; *Psychology Today*, Board of Directors, 1987-88;
Comm. on Division/APA Relations (CODAPAR), 1988-89, Public Information Comm. 1989-1992
Task Force on Recovered Memories of Child Sexual Abuse, 1993-96

Association for Psychological Science (Formerly American Psychological Society) Committee work:

Fund for Advancement of Psychological Science, Board Member, 2003- . (Chair: Bequest Subcommittee).

Cattell Award Committee, 2001-05 .

Association for Advancement of Psychology (AAP), Board of Trustees, 1981-85

Federation of Behavioral, Psychological, and Cognitive Sciences:

Executive Committee, 1992-95

National Academies: (inc. National Academy of Sciences)

Committee on ELF Radiation, 1976-77

Committee on Basic Research in the Behavioral and Social Sciences, 1980-82

Committee on Use of Statistical Evidence in Court, 1982-85

Committee on Cognitive Aspects of Survey Methodology, 1982-83

Division of Behavioral & Social Sciences & Education (DBASSE) Executive Board, 2005 -2011

National Academy of Sciences, Class Membership Committee, 2005, 2006,. 2007

Committee on Military and Intelligence Methodology for Emergent Physiological and
Cognitive/Neural Science Research, 2007 - 08.

Board on Human-Systems Integration, NRC, 2014- 2017

Standing Committee on Advancing Science Communication Research and Practice 2018- present

American Philosophical Society

TNG for Psychology, 2006-08

Social Sciences Research Council:

Committee on Cognition and Surveys, 1985-90

Bureau of National Affairs, Advisory Committee on Complex Litigation, 1987-1990

Representative from University Faculty to State Legislature, 1976-78

Advisory Comm., Institute of Government and Public Affairs, Univ. of Illinois, 1987-1992

FMS Foundation Advisory Board, 1992-2019.

NIMH Behavioral Sciences Task Force, 1993

Sage Series on Counseling Women, Advisor, 1995-96

Exploratorium, San Francisco's Science Museum, Advisor, 1990-91, 1996-98

Brain.com Corporation, Scientific Advisory Board, 1999-2001

Center on Wrongful Convictions, National Advisory Board, 2000-

NewKirk Center for Science & Society, Advisory Board, 2002-

International Institute of Psychotherapy and Applied Mental Health

Babes-Bolyai University, Cluj-Napoca, (Affiliated faculty), Romania, 2003 - .

Member, Board of Commissioners, American Judicature Society Commission on Forensic Science &
Public Policy, 2005-2010.

Sage Cognitive Psychology Program, Consulting Board Member, 2006-2008

Institute for Memory Impairments and Neurological Disorders (MIND), Advisory Board, 2009-2015

Committee for Skeptical Inquiry (CSI), Executive Council, 2011- present.

National Science Communication Institute, Board of Directors, 2011-2014.

Consortium of Social Science Associations (COSSA), Board of Directors, 2012 – 2013

GOVERNMENT AND OTHER CONSULTING

General Services Administration, 1974-77

Federal Trade Commission, 1976-77
 Bay Area Rapid Transit, San Francisco, 1979
 U.S. Department of Justice (National Crime Survey), 1980
 Consultant for attorneys and other members of the legal profession in 34 US states,
 Canada, South Korea, Israel, Sweden, Japan, The Netherlands, Ireland, Scotland, Portugal
 Law Reform Commission of Canada, 1981
 Westin Hotels, AT&T, Schering-Plough, L.A. Gear, and other corporations
 Internal Revenue Service, 1984
 National Center for Health Statistics, 1985
 US Secret Service, 1986
 Unified Court System, NY., 1989-90
 Consultant to Canadian Government Officials re eyewitness testimony (Sophonow Inquiry), 2001
 Central Intelligence Agency, 2005 –2006. .
 Veterans Education Association, Academic Advisory Board Member, 2006 .
 Grawemeyer Award External Review Panel, 2008.

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- Loftus, E. F. (2016) Illusions of Memory. *Skeptical Inquirer*, 40, 22-23. (Honorary Doctorate Acceptance Speech)
- Frenda, S.J., Berkowitz, S.R., Loftus, E.F., & Fenn, K.M. (2016) Sleep deprivation and false confessions. *Proceedings of the National Academy of Sciences*, 113, 2047-2050.
- Cochran, K., Greenspan, R., Bogart, D., & Loftus, E.,F. (2016) Memory Blindness: Altered memory reports lead to distortions in eyewitness memory. *Memory & Cognition*, 44, 717-726.
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- Grady, R.H., Butler, B.J. & Loftus, E.F. (2016) What should happen after an officer-involved shooting? Memory concerns in police reporting procedures. *Journal of Applied Research in Memory & Cognition*, 5, 246-251.
- Newman, E. J., Frenda, S.J. & Loftus, E.F. (2016) Memory as Reconstructive. In H.L. Miller,Jr.. (Ed) *Sage Encyclopedia of Theory in Psychology*. (Vol 2, p 545-549) Thousand Oaks, Calif: Sage
- Loftus, E.F. (2016) To enhance justice: The risk and reward of studying memory. *The Humanist* (Isaac Asimov Science Award acceptance speech) vol 76, #6, p 29-32.
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2017

- Loftus, E.F. (2017) Eavesdropping on Memory. *Annual Review of Psychology*, 68, 1-18.
- Van Damme, I., Kaplan, R.,L., Levine, L.J., & Loftus, E.F. (2017) Emotion and false memory: How goal-irrelevance can be relevant for what people remember. *Memory*, 25, 201-213. DOI: 10.1080/09658211.2016.1150489.
- Berkowitz, S.F. & Loftus, E.F. (2017). Misinformation in the Courtroom. In H. Otgaar & M.L Howe (Eds) *Finding the truth in the courtroom*. Oxford Univ Press.
- Laney, C. & Loftus, E.F. (2017) False memories matter. In R. A. Nash & J. Ost (Eds) *False and Distorted Memories*. NY & London: Routledge., p 143-155.
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- Pickrell, J., McDonald, D., Bernstein, D.M., & Loftus, E.F. (2017) Misinformation effect. In R.F. Pohl (Ed) *Cognitive Illusions: Intriguing phenomena in thinking, judgment, and memory* (2nd ed). Hove, UK: Psychology Press, pp 406-423.
- Crozier, W., Strange, D., & Loftus, E.F. (2017) Memory errors in alibi generation. *Behavioral Sciences & the Law*.35, 6-17.
- Loftus, E.F. & Greenspan, R.L. (2017) If I'm certain, is it true? Accuracy and Confidence in eyewitness memory. *Psychological Science in the Public Interest*, 18, 1-2
- Loftus, E.F., Dysart, J.E. & Newirth, K.A. (2017) *Eyewitness testimony: Civil & Criminal*. 5th Ed. 2017 Cumulative Supplement, p 1-31. Charlottesville, VA: Lexis Law Publishing,
- Bogart, D. & Loftus, E. (2017) Eyewitness testimony:A US case study. *Psychology Review*, Vol 23,7, 2-5

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- Murphy, G., Loftus, E.F., Grady, R., Levine, L., & Greene, C. (2020) Fool me twice: How effective is debriefing in false memory studies? *Memory*, 28, 938-949.
- Murphy, G., Loftus, E.F., Grady, R., Levine, L., & Greene, C. (2020) Misremembering Motives: The unreliability of voters' memories of the reasons for their vote. *Journal of Applied Research on Memory and Cognition*, 9, 564-575.
- Otgaar, H., Wang, J., Dodier, O., Howe, M.L., Lilienfeld, S.O., Loftus, E.F., Lynn, S.J., Merckelbach, H., & Patihis, L. (2020) Skirting the issue: What does believing in repression mean? *Journal of Experimental Psychology: General*, 149, 2005-06.

2021 and in press

- Feeling, N., Williams, D.P., Speller, L.F., Koenig, J., Loftus, E.F., & Thayer, J.F. (2021) Resting state heart rate variability and false memories. *International Journal of Psychophysiology*, 159, 17-22.
- Berkowitz, S.R., Garrett, B.L., Fenn, K.M., & Loftus, E.F. (in press) Convicting with confidence. *Memory*.
- Greenspan, R. L. & Loftus, E.F. (2021) Pandemics and infodemics: Research on the effects of misinformation on memory. *Human Behavior and Emerging Technologies*, 3, 8-12.
- Otgaar, H., Howe, M.L., Dodier, O., Lilienfeld, S.O., Loftus, E.F., Lynn, S.J., Merckelbach, H., & Patihis, L., (2021) Belief in unconscious repressed memory persists. *Perspectives on Psychological Science*, 16, 454-460.
- Kenchel, J., Domagalski, K., Butler, B., & Loftus, E.F. (in press) The messy landscape of eye movements and false memories. *Memory*.
- Bailey, N.A., Olaguez, A.P., Klemfuss, J.Z., & Loftus, E.F., (2021) Tactics for increasing resistance to varying amounts of misinformation. *Applied Cognitive Psychology*, 35, 863-872.
- Levine, L.J, Murphy, G., Lench, H.C., Greene, C.M., Loftus E.F., Tinti, C., Schmidt, S., Muzzulini, B., Grady, R.H., Stark, S.M. & Stark, C.E.L. (in press) Remembering facts versus feelings in the wake of political events. *Cognition & Emotion*.
- Greenspan, R. L. & Loftus, E.F., (in press) What happens after debriefing? *Memory & Cognition*
- Wixted, J.T., Wells, G.L., Loftus, E.F., & Garrett, B.L. (in press) Test a witness's memory of a suspect only once. *Perspectives on Psychological Science*.
- Grady, R.H., Ditto, P.H. & Loftus, E.F. (in press) Nevertheless, partisanship persisted: Fake news warnings help briefly, but bias returns with time. *Cognitive Research: Principles and Implications*.
- Greenspan, R.L. & Loftus, E.F. (in press) Patterns in use of best practices for eyewitness identification in the field. *Psychology, Crime, & Law*.
- Loftus, E.F. (in press). Tricked by Memory. *Reflections of Pioneering Women in Psychology*. Bookwala, J. & Newton, N. (Eds), Cambridge, UK: Cambridge University Press.
- Miller, Q. C., London, K., & Loftus, E. F. (In press). The politics of sexual misconduct allegations: A memory science framework. In C. L. Frisby, W. T. O'Donohue, S. O. Lilienfeld, & R.E. Redding (Eds.), *Political bias in psychology: Nature, scope, and solutions*. Springer.

INVITED ADDRESSES

1969

Civil Service Commission for the Education
Program in Systematic Analysis, Wash DC

1972.

Conference on Formal Aspects of the
Cognitive Process, University of Michigan
Eastern Verbal Investigator's League (EVIL),
New York

1973

Johns Hopkins University
Harvard University
Columbia University
University of Colorado
Conference on Cognition, Perception, and
Adaptation, University of Minnesota
Bell Laboratories
Perception Consortium of New York

1974

University of Oregon
University of Kansas
Washington Defense Counsel, Seattle

1975

University of Lethbridge
Kansas State University
Evergreen State College
University of Wisconsin, Madison
Lawrence University
Harvard University
New School for Social Research
Washington State Trial Lawyers Association,
Vancouver
Massachusetts Defenders Committee, Boston
Harvard Law School

1976

Ohio State University
University of Pittsburgh
University of Massachusetts, Boston
University of Toronto
McMaster University
Wheaton College
University of Utah
Brandeis University
Oklahoma State University
State University of New York, Buffalo
Assn of Trial Lawyers of America (ATLA)
National College of Advocacy, Reno/Boston
United States Attorneys, Seattle
Oklahoma County Bar Assn, Oklahoma City
Connecticut Trial Lawyers Assn, Hartford
Judge Advocate General's School,
Charlottesville, Virginia
Law Society of Upper Canada, Toronto
Florida Bar Assn, Tampa and Miami
Bolt, Beranek & Newman, Cambridge
Colloquium on New Ways of Analyzing
Variation in English, Georgetown University
Defense Advanced Research Projects Agency,
New York

1977

University of Western Ontario
Bowling Green State University
Simon Fraser University
ATLA, Fifth Circuit Seminar, New Orleans
New York State Bar Association, New York
Washington State Patrol, Shelton, WA
Criminal Justice Training Commission
Seminar, Issaquah, Washington; Seattle
Advocacy Education Seminar, Burlington VT
ATLA, National College of Advocacy, Reno,
NV
ATLA, National Convention, Washington, DC
Oregon Criminal Defense Association, Seaside
ATLA, First Circuit Seminar, Boston

1978

Kearney State College, Nebraska
University of Michigan
University of Minnesota
Stanford University
University of California, San Diego
North Carolina Academy of Trial Lawyers,
Charlotte
Washington State Bar Assn, Continuing Legal
Education, Olympia
ATLA, Mid-Winter Meeting, Monte Carlo,
Monaco
29th Annual Advocacy Institute, University of
Michigan
National Institute of Trial Advocacy (NITA),
NW Regional, University of Oregon
Federation of Law Societies of Canada,
Criminal Evidence Program, Toronto
Louisiana Trial Lawyers Assn, New Orleans
ATLA Seminar on Trial Tactics, Camp
Pendleton, CA
American Judges Association Annual Meeting
SAFECO Insurance Company Continuing
Education Program
Law and Society Assn, Univ of Minnesota

1979

California State University, Chico
Carnegie-Mellon University
Yale University (one week)
Duke University
University of California, Santa Barbara
California State University, Fullerton
University of California, Berkeley
State University of New York, Stony Brook
Hope College
University of Nebraska, Omaha
Canadian Bar Association, Vancouver
Pennsylvania Trial Lawyers Assn,
Philadelphia & Pittsburgh
Montana Trial Lawyers Assn, Butte
West Virginia Trial Lawyers Assn, Charleston
National College of Advocacy, Hastings Law
School
Public Defender Office, Santa Clara Cty, CA
Nebraska Assn of Trial Attorneys
Standard Oil (AMOCO Research Center),
Chicago, IL
Montsanto, St. Louis, MO
New York Academy of Sciences
Conference on Memory and Amnesia,
Lebanon, NH
Conf: Developmental and Experimental
Approaches to Human Memory, U. of
Michigan

1980

University of Victoria
Hamilton College
McGill University

Sam Houston State University
 Trent University (Canada)
 University of Toronto
 Washington State University
 Idaho State University
 University of California, Riverside
 Oklahoma State University
 University of Missouri, Columbia (3 days)
 University of Wisconsin, La Crosse
 Nova Scotia Barrister's Society, Dalhousie
 Law School, Halifax
 University of British Columbia Law School,
 Vancouver
 California Public Defenders Assn., Asilomar
 Tennessee Trial Lawyers Assn, Nashville
 Kansas District Judges Assn
 Kansas Bar Assn
 Hastings Law School
 Washington DC Public Defender's Office
 Memphis State Trial Lawyers
 American Bar Assn/ATLA, Las Vegas
 Maryland Trial Lawyers Annual Meeting,
 Ocean City
 New York Bar Assn Advocacy Course, New
 York City
 Hoffmann-LaRoche, Nutley, NJ
 American Institutes of Research, Wash., DC
 Canadian Psychological Association Annual
 Meeting, Calgary
 Attention and Performance, IX, Cambridge,
 England
 Council for Advancement of Science Writing,
 Durham

1981

University of South Florida
 Northwestern University, Business School
 Stanford University
 University of Texas, El Paso
 Claremont Graduate School
 University of Illinois
 Copenhagen University
 University of Stockholm
 Federal Defenders Annual Meeting, San Diego
 Oregon Trial Lawyers, Portland
 California Attorneys for Criminal Justice
 Hastings Law School, San Francisco
 ABA/ATLA Seminar, Las Vegas
 Northwestern Law School, Chicago
 Inner Circle of Advocates, Sun Valley
 Annual Institute, Georgetown University Law
 Center, Washington, DC
 Professional Institutes Seminar, Puerto Rico
 National College of Juvenile Justice, San
 Francisco
 S.S.R.C. Conference on Law and Psychology,
 Oxford, England
 Chaucer Club, MRC Applied Psychology

Unit, Cambridge, England
 British Psych Society, Guildford, England
 AT&T Corporate Security
 Chautauqua Institution, Science Week
 G. Stanley Hall Lecture, APA

1982

Rice University
 Texas A&M
 University of Texas, Austin
 Union College
 SUNY, Plattsburgh
 University of Texas, Arlington
 James Madison University
 University of Virginia
 University of Colorado (3 days)
 Miami University (Ohio)
 Canadian Bar Assn., Alberta Branch, Calgary
 Washington State Judges, Yakima
 McGeorge School of Law (High Table)
 Oklahoma County Bar
 Northwestern Law School
 Harvard Law School
 Georgetown Law School
 Indiana Trial Lawyers Assn
 West Palm Beach County Bar
 Eastern Psychological Association, Baltimore
 Clover Park Administrators

1983

University of Cincinnati
 UCLA
 Reed College
 San Diego State University
 Ohio State University
 University of Houston
 Eastern Washington University
 Nebraska Wesleyan University (Psychology
 Fair Speaker)
 University of Denver
 American Assn of Law Schools, Cincinnati
 Oregon Trial Lawyers Assn
 Northwestern Law School
 Atlanta Bar Assn Seminar
 Washington Assn of Technical Accident
 Investigators (WATAI)
 Arizona Prosecuting Attorneys Advisory
 Council, Phoenix
 Academy of Florida Trial Lawyers, Miami
 Medical Disciplinary Board, State of
 Washington
 The Royal Society, London
 American Psychological Assn, Anaheim
 Max Planck Institute, West Berlin
 American Society of Criminology, Denver
 Merrill Lynch, Palm Springs

1984

University of British Columbia
 University of Toronto

Williams College (IBM Lectureship)
 Roanoke College (Fowler Lectureship)
 Hebrew University, Jerusalem
 Maryland Bar Association, Baltimore
 California Attorneys for Criminal Justice, Los Angeles
 Canadian Bar Assn, Ontario Branch
 ATLA, Annual Meeting
 Northwestern Law School
 Philadelphia Public Defender's Office
 Seattle Public Defender's Office
 Nova Scotia Barristers, Halifax
 Science and Public Policy Seminar, Federation, Washington, DC
 California State University Administrators Conference on Computers & Education
 Continuing Medical Educ, U. of Washington

1985

California State University, Long Beach
 Vanderbilt/Peabody, Nashville
 North Carolina Psychological Conference, North Carolina State
 Ohio Wesleyan University
 Minnesota Psychology Conference
 Creighton University, Nebraska
 Florida State University
 Leiden University, The Netherlands
 San Diego Defenders
 New Mexico Trial Lawyers
 Tennessee Assn. of Criminal Defense Lawyers
 Northwestern Law School
 Washington Association of Defense Counsel
 ATLA Criminal Seminar, Houston
 Court Appointed Special Advocate Assn
 Northwest Women's Law Center
 Colorado Defense Lawyers Association
 American Association of Law Libraries, NY
 University of Bridgeport Law School
 Texas Research Institute, Houston
 German Psychological Society (Law & Psychology Division), Braunschweig, FRG
 Institute for Perception, TNO, Soesterberg, The Netherlands

1986

SUNY, Stony Brook
 Oregon State University
 University of Michigan (Survey Research)
 University of Maryland
 Duke University
 Johns Hopkins University
 Judicial Studies Program (California Judges)
 Michigan Judicial Institute (Michigan Judges)
 Texas Assn. of Defense Counsel, San Francisco
 All-Star Seminar, Atlanta Bar, Atlanta
 US Census Bureau, Washington, DC
 Annenberg School of Communication

Women and Memory, University of Michigan
 American Assn. of Public Opinion Res., Wash., DC
 Federal Judicial Center
 Capitol Area Social Psychological Assn
 Bureau of Labor Statistics
 Washington DC Public Defenders
 Smithsonian Institute

1987

University of Nevada, Reno
 University of North Dakota
 California Judicial Studies
 Harvard Law School
 Duke Law School
 University of South Carolina Law School
 Annual Joseph Cohen Lectureship, University of Missouri, Kansas City
 British Psychological Society, Brighton, England
 US Court of Military Appeals Conf, Wash, DC
 National Academy of Arbitrators, New Orleans
 Judicial Conference of Washington, DC
 University of UMEA, Sweden
 Cleveland-Marshall Law School, Cleveland
 Indiana University Law School, Bloomington
 Indiana University Psychology Department
 Hebrew University, Jerusalem
 Cornell University
 Washington Assn of Criminal Defense Lawyers
 Tennessee Assn. of Criminal Defense Lawyers
 Recorder's Court, Detroit

1988

California Judicial Studies (Judges)
 Washington Criminal Justice Training Committee (Police)
 ATLA, New York
 New York University
 Northwestern Law School
 Ohio Assn of Criminal Defense Lawyers, Cincinnati
 Baylor University, Waco, Texas (Oral History & Memory)
 Southeastern Louisiana Univ. (Scholar in Residence)
 Haverford College
 Arizona State University (Psychology Department and Law School)
 Rocky Mountain Psychological Assn (Keynote)
 University of Oregon
 North Carolina Academy of Trial Lawyers, Greensboro
 Lane County Law Forum, Oregon
 NATO Advanced Study Institute, Maratea, Italy
 ATLA, Annual Meeting, Kansas City

Northwestern Law School for prosecutors and defense attorneys
 Cook County Public Defenders
 International Congress of Psychology, Sydney, Australia (Keynote)
 Medico Legal Society of Queensland, Australia
 Brigham Young University Law School
 BYU Psychology Department
 Baylor University Law School
 University of California, San Diego
 University of Washington Law School

1989

Yale University Law School
 Yale Psychology Department
 University of Michigan
 University of California, San Diego
 Northern Kentucky University
 Southern Indiana University, Evansville (Mid-America Conference, Keynote)
 Northwestern Law School
 Western Psychological Association, Reno
 Northwestern Law School for prosecutors and defense attorneys, Chicago
 American Bar Assn, Litigation Sect, Honolulu
 British Psychological Society, Cognitive Section, Cambridge, England

1990

Leiden University, the Netherlands
 Emory University, Flashbulb Memory conf
 American Bar Association, Satellite Seminar on Jury Comprehension, Washington, DC
 University of West Virginia, Practical Cognition Conference
 ABA Litigation Sec, Trial Practice Committee, Phoenix
 Annenberg Conference on Selecting Impartial Jurors, Washington DC
 University of Pittsburgh
 Northwestern Law School
 European Conference on Law & Psychology, Nuremberg, Germany
 University of Minnesota Law School

1991

National Institute on Teaching of Psych, Fl
 ABA (American Bar Foundation)
 Ontario Psychological Association, Toronto
 Ryerson College, Canada, 11th Annual Psychology Lecture
 Arkansas Annual Psych Conference (Keynote)
 Seattle Rotary
 Northwestern University Law School
 University of Lethbridge, Canada
 Banff Conference on Cognitive Science, Canada
 Society of British Columbia, Continuing Legal Education

Fordham University, NY
 Legal Aid Society, NY
 AIDS Survey Research Methodology Conference, Rockville, MD
 Course for prosecuting and defense attorneys, Northwestern Law
 American Psych Assn, San Francisco, CA
 University of Toronto
 Ontario Science Centre
 Chief Executive Organization Forum, Vancouver
 University of Georgia (Wm. Owens Annual Lectureship)
 8th International Conference on Multiple Personality/Dissociative States (Plenary Speaker), Chicago
 Federal Bureau of Investigation (FBI), Washington State

1992

International Listening Association (Keynote)
 University of Tennessee, Knoxville
 Mississippi State University
 Federal Defenders Assn, San Diego
 Reed College
 Portland Community College
 University of California, Santa Cruz
 Augustana College, Illinois (Stone Memorial Lecture)
 Canadian Bar Association, Toronto
 University of Toledo
 NATO Conference, Lucca, Italy
 Criminal Justice Act Seminar (Keynote), San Diego
 Psi Chi/Fredrick Howell Lewis Distinguished lecture, APA, Washington DC
 Grand Rounds, Department of Psychiatry, University of Washington Medical School
 Air Force Academy, Colorado Springs
 Faculty Auxiliary, University of Washington
 University of Stockholm, Sweden
 Swedish Psychological Association (Keynote Speaker)
 Gruter Institute, Squaw Valley
 Lawrence University (Wisconsin, Convocation Speaker)
 FJC Criminal Procedure Seminar for Federal Judges, Palm Beach

1993

McGill University (D.O. Hebb Lecturer)
 American Psychiatric Assn, San Francisco
 Law-Psychology Symposium (Keynote Speaker), California State Univ., Fullerton
 New Mexico Psychological Assn/New Mexico Trial Lawyers, Santa Fe
 FMS Foundation Conf, Valley Forge, PA
 Young President's Organization Alumnus (YPOA), Seattle

Pacific Northwest Writers, Seattle
 Midwestern Psychological Assn, Chicago
 NACDL/ATLA College of Trial Advocacy
 Seminar, Las Vegas
 American Academy of Forensic Psychology,
 Continuing Education, Invited Workshop
 Mystery Writers of America
 Colorado Psychological Assn, Aspen
 Swiss Memory Psychology Program, Vals,
 Switzerland
 Medical-Legal Society of Toronto
 American Psychological Association, Invited
 Presidential Debate, Toronto
 Midwest Conference on Child Sexual Abuse &
 Incest, Madison, Wisconsin
 Clark Univ., Conf on Trauma and Memory

1994

Orrick, Herrington, Sutcliffe Retreat,
 Silverado
 Mercer Island Rotary
 Seattle Forensic Institute
 Bay State Medical Center, Trauma and
 Memory Conference, Springfield, MA
 University of New Mexico Medical School
 (Grand Rounds)
 Red River Undergraduate Conference, Fargo,
 North Dakota (Keynote)
 Leiden University, The Netherlands
 National Association of Criminal Defense
 Lawyers, Washington, DC
 Washington Assn of Criminal Defense
 Attorneys
 University of San Diego, School of Law, CLE
 Missoula Psychiatric Services, Conference on
 Law and Psychiatry, Missoula, Montana
 Mind/Brain/Behavior Program, Memory
 Distortion Conference, Harvard University
 Georgia Psychological Assn Continuing
 Education, Atlanta
 Simon Fraser University, (Keynote speaker,
 conference on Memories of Sexual Abuse),
 Vancouver, Canada
 7th Annual Dual Disorder Conference,
 Bellevue, Washington
 Stanford University, Psychology Colloquium
 Stanford University Medical School,
 Department of Psychiatry, Grand Rounds
 American Psychological Society (Teaching
 Institute), Wash. DC
 Committee for the Scientific Investigation of
 Claims of the Paranormal (CSICOP)
 Psych Methods in the Investigation and Court
 Treatment of Sexual Abuse, Tromsø,
 Norway
 American Assn of Public Welfare Attorneys,
 Seattle
 Japanese Psych Assn (keynote), Tokyo

Japan Federation of Bar Associations, Tokyo
 University of Colorado, Denver
 Current Topics in Mental Health & Law,
 Seattle
 Criminal Lawyers' Assn, Toronto
 Criminal Trial Lawyers Assn, Alberta, Canada
 Johns Hopkins Medical School/FMS
 Foundation Conf on Memory and Reality,
 Baltimore, Md (keynote)

1995

University of Washington Medical School,
 Pain Grand Rounds
 University of California at Los Angeles
 American Academy of Forensic Sciences,
 Annual Meeting
 King County Detectives, Special Assault Unit
 University of Pittsburgh
 Pennsylvania Conference of State Trial Judges
 University of California, San Francisco,
 Department of Psychiatry Grand Rounds
 University of Kansas Medical Center
 (Childhood sex abuse and memories
 conference)
 Indiana University, South Bend (keynote to
 commemorate 175th year anniversary of IU)
 Rice University, Houston
 Battig Memorial Lecturer, Rocky Mountain
 Psychological Assn, Boulder
 National Judicial Institute, Seminar for Judges,
 Winnipeg, Manitoba, Canada
 University of Illinois, Chicago, Distinguished
 Lecture - Midwestern Psychological Assn.
 Carnegie Mellon University, 27th annual
 conference, Pittsburgh
 National Association of Legal Investigators,
 Annual Convention, Portland
 American Psychological Society (Invited
 speaker), New York
 Charter Behavioral Health System of Dallas
 Workshops on Memory, Sexual Trauma &
 the Law, (Invited speaker), Seattle, San
 Francisco, San Diego
 Council of Appellate Staff Attorneys (ABA
 Seminar), Blaine, Washington
 American Academy of Forensic Psychology,
 Distinguished Contributions Award address,
 APA annual meeting, New York City
 University of Pennsylvania Medical School,
 Department of Psychiatry (Grand Rounds)
 Assn for Advancement of Behavior Therapy
 Annual meeting, Washington DC (keynote)
 California Public Defenders Assn, Napa, CA
 Beth Israel Hospital, Harvard Medical School,
 Psychiatry Grand Rounds (honoring F.
 Frankel)
 Fourth Annual Conference on Mental Health
 and the Law, Orlando, Florida

International Society for the Study of
Dissociation, Lake Buena Vista, FL
California State University, Humboldt Co., CA
Western Humanities Conference, Santa
Barbara (keynote: Illusions of Memory)
Washington State Psychological Association,
Annual meeting (Featured Speaker), Tacoma
American Academy of Psychiatry and the Law
(Luncheon keynote: Memory Distortion),
Annual Meeting, Seattle, Washington
Criminal Lawyers Association, Toronto
University of Kansas (Ferne-Fischer-Formann
Lecturer), Lawrence, Kansas
Judgment & Decision Making Conference,
Annual meeting, Los Angeles (keynote)
Adelphi University, Consciousness Symp.,
Centennial Speaker, Garden City, NY
Washington University Medical School,
Psychiatry (Gildea Lecture), St. Louis

1996

Calvin College, The January Series, Grand
Rapids, Michigan
University of Calif, Davis, Neuroscience
Colloquium
Interval Research Corporation, Palo Alto
Pacific Sociological Assn , Annual Meeting,
Seattle
John Hopkins Medical Institute/FMSF, San
Diego
Southwestern Psychological Association,
Annual Meeting, Houston (keynote)
Memory Retrieval Controversy Conference,
Trent University, Peterborough, Ontario
Tenth National Conference on Undergraduate
Research, University of North Carolina,
Asheville, (keynote)
American Philosophical Society, Annual
Meeting, Philadelphia
NATO International Conf, Recollections of
trauma, France (main speaker)
Second International Conference on Memory,
University of Padova, Italy (keynote)
International Conference on Centenary of
Piaget's Birth, Universite de Neuchatel,
Switzerland
Grinnell College, Scholars' Convocation
speaker, Grinnell, Iowa
University of Texas, Houston, Department of
Psychiatry and Behavioral Sciences
University of California, Riverside, Memory
Recovery & Creation Conference (keynote)
Ohio University, Athens, OH
University of South Florida, Sarasota,
Conference on Child Abuse in Our Time
Seattle Forensic Institute, Conference on
Sexual Abuse and its Recollection
National Guild of Hypnotists, Pacific NW

Chapter and the Washington Hypnosis Assn
American Psychological Society, Annual
meeting, San Francisco (Presidential
Symposium speaker)
Emory University, Atlanta
University of Texas, Austin
National Child Abuse Defense & Resource
Center, 5th Internat Conf, Las Vegas, NV
Iowa State University, Ames, Iowa
Nebraska Psychological Association, Omaha
Washington University, St. Louis
Exploratorium (Science Museum), San
Francisco
National Institute of Health, Conference on
Self-Report, Bethesda, MD
California Attorneys for Criminal Justice, San
Francisco

1997

Justice Committee, Conference on "Day of
Contrition," Salem, MA
National Institute of Health, Conference on
Undue Influence, Bethesda, MD
American Association for Advancement of
Science, Annual Meeting
Washington University, St. Louis (Assembly
Speaker)
University of Arizona
Penn State Univ, Inaugural Herschel W. and
Eileen W. Leibowitz Lecture, Univ Park, PA
Johns Hopkins University Medical School,
Baltimore, MD
False Memory Syndrome Foundation
Conference, Baltimore, MD
Bradley Univ, Centennial Speaker, Peoria, IL
American College of Forensic Psychology,
Main Speaker, Vancouver, Canada
Western Psychological Assn, Invited speaker,
Seattle, WA
National Inst on Drug Abuse, Rockville, MD
International Women's Forum, Wash. DC.
Center for Inquiry--Rockies, Conference on
Gender Politics of Science, Boulder, CO
Memory Conference (keynote), Bar Ilan
University, Israel
National Child Abuse Def & Resource Center,
6th International Conference, Las Vegas, NV
University of Groningen, Groningen, The
Netherlands (Studium Generale)
Lecture, Heymans Institute for Fundamental
Psychologic Research, Univ. of Groningen
Twente University, Enschede, Netherlands
University of Maastricht, The Netherlands
The Whidden Lectures, McMaster University,
Hamilton, Canada

1998

Conference on False Memory Creation,
Florida Atlantic University, Boca Raton

Conference on Recovering Repressed Memories or Creating False Ones, Florida Atlantic Univ.
 The Marian Jane Girard Memorial Lecture, Scripps College, CA
 American Psychology-Law Society (Major invited address), Redondo, CA
 Florida Cognition Conference (Keynote speaker), Florida International University
 8th Annual National Symposium on Mental Health & Law, Miami, FL
 The SPES Society, Naples, FL
 University of Michigan -Cognitive Psych Group
 State Bar of Michigan, Litigation Section (featured guest speaker), Ann Arbor, MI
 Washington Association of Criminal Defense Lawyers Annual Meeting
 Baldwin-Wallace College, Harrington Visiting Professor (HVP), Ohio
 National Association of Criminal Defense Lawyers annual meeting, Santa Monica, CA
 Connecticut Bar Assn, Eyewitness Testimony & False Memories (Special Guest Speaker), Hartford, CT
 Conference On Memory, Consciousness, Brain (Tulving Conference), Tallinn, Estonia
 Florida Association of Criminal Defense Lawyers, Marco Island
 Conference on Reconstructing the Past, Stockholm, Sweden
 Conference on Psychology of Testimony, Portsmouth, England (Keynote)
 University of Portsmouth, England 1998 Commencement
 University of Bristol, Bristol, England
 2nd World Skeptics Congress, University of Heidelberg, Germany (Keynote address)
 Paul McReynold's Lecturer, Univ. of Nevada, Reno
 Conference "Embracing Science in an Irrational World", Center for Inquiry Institute, Bellevue, WA
 National Child Abuse Def & Resource Center, 7th International Conference, Las Vegas, NV
 Conference "Memory & Suggestibility in psychotherapeutic relationships", Psychoanalytic Institute, St. Louis, MO
 National Conference On Wrongful Convictions, Northwestern University Law School, Chicago
 The Exploratorium (Science Museum), San Francisco

1999

Seattle University School of Law, Tacoma
 University of California, Irvine and Irvine Health Foundation

Ohio Assn of Criminal Defense Lawyers, Dayton
 George Fox University, Oregon: Social Sciences Conference (Keynote speaker)
 Newberg, OR
 Idaho Neurological Institute, Saint Alphonsus Medical Center, Boise, Id
 Idaho Psychological Association, CE, Coeur D'Alene
 National Legal Aid & Defender Assn, Death Penalty Conference, Atlanta, GA
 West Virginia Psychology Conference, Marshall University, Huntington,, WV., (Keynote)
 Eastern Psychological Assn, Providence, RI (Presidential Speaker)
 6th Annual California State Univ. Psychology Research Fair, San Marcos, CA(Keynote)
 West Virginia State Bar Assn, Morgantown, WV
 New York Skeptics Society, NY (Isaac Asimov Lecture Award)
 Northwest Cognition Conference, Victoria, B.C. (Keynote)
 Iowa Public Defender's Annual Meeting, Dubuque, IO
 West Virginia Public Defender's Annual Meeting, Canaan Valley, WV
 Clark County Bar Assn CLE, Las Vegas, NV
 Tennessee Assn of Criminal Defense Lawyers, Nashville, TN
 Indiana University, Bloomington (Patten Lecturer)
 New Hampshire Public Defender's Association, Manchester
 Dartmouth University, Hanover (Symposium on the Future of Psychological and Brain Sciences, at dedication of Moore Hall)
 8th International Conference on Allegations of Child abuse, Las Vegas, NV
 Ernest Becker Foundation
 University of North Carolina, Greensboro, Harriet Elliot Lecture Series
 Federal Bureau of Investigation, Agents Training Conference
 Indiana Public Defender Council, Indianapolis

2000

Stanford University (Zimbardo Millenium)
 University of Northern Colorado, Greeley
 Wrongful Conviction Conference, Newport Beach, CA
 University of North Florida, Jacksonville
 California State University, Sacramento
 New York Medical College, Westchester, NY
 Memory and Reality Conference, FMS Foundation, White Plains, NY
 Innocence Project Conference, Cavanaugh's,

Seattle, WA
 Johnson Memorial Lecture, Minnesota
 Psychology Undergraduate Conference,
 Macalester College, MN
 National Association of Criminal Defense
 Lawyers (NACDL), Tucson, AZ
 Vrije Universiteit (Free University),
 Amsterdam, Netherlands
 American Psychological Society, Teaching
 Institute, Miami, FL
 Oregon Association of Criminal Defense
 Lawyers, Bend, OR
 Columbia University, Department of
 Psychiatry, Grand Rounds, NY
 Georgia Indigent Defense Council, Atlanta
 New Zealand Psychological Society (keynote),
 Hamilton, NZ
 Victoria University, Wellington, New Zealand
 University of Otago, Dunedin, NZ
 University of Wisconsin, Parkside
 University of Tennessee Law School,
 Knoxville
 National Child Abuse Def. & Resource Center,
 Kansas City
 University of Tennessee Psychology Colloq
 Barristers, Solicitors, Psychiatrists:
 Fitzwilliam hotel, Dublin, Ireland
 William & Mary Law School, Williamsburg, VA
 Psychology Dept, William & Mary College, VA

2001

California Public Defenders Association, Palm
 Springs, CA
 University of Oklahoma, Norman
 National Association of Criminal Defense
 Lawyers, Las Vegas
 National Legal Aid and Defender Assn,
 Albuquerque, NM
 University of California, Irvine
 Science & Technology, Flaschner Judicial
 Institute, Brandeis University
 Rochester Inst. of Technology, Rochester, NY
 New York Academy of Medicine (& Anna
 Freud Centre), New York
 George Mason Law School, Institute for
 Judges, Tucson, AZ
 Brown University, Harold Schlosberg
 Colloquium Lecturer, Providence, RI
 Oregon Health Sciences Univ., School of
 Medicine, Portland (Saslow Lecturer)
 Ontario Ministry of Health & Mental Health
 Center, Penetanguishene, Canada
 Future of Psychopathology, Bar-Ilan
 University, Israel
 Superior Court Judges, State of Georgia, St.
 Simons Island, GA
 Tennessee Assn of Criminal Defense Lawyers,
 Nashville

British Association for Advancement of
 Science, Glasgow, Scotland
 British Psych Society, Cognitive Section &
 European Society of Cog Psych, Edinburgh,
 Scotland
 University of Michigan, Institute for Social
 Research
 Federal Defender Program & Ill. Assn of
 Criminal Defense Lawyers, Chicago
 Louisiana State University, (Memory &
 Narrative), Baton Rouge, Louisiana
 University of Portland, Oregon

2002

Cleveland-Marshall Law School, Cleveland,
 OH
 SSSS Western Region Conference (key
 invited), Manhattan Beach, CA
 Harvard Law School, Wrongful Convictions
 conf.
 University of Wyoming
 Womens' University Club, Seattle
 Midwestern Psychological Assn (Psi Chi,
 Invited Speaker), Chicago
 National Academy of Sciences, Washington
 DC (Henry & Bryna David Award Lecture)
 Northwestern University
 Annual Whistleblower Investigators
 Conference, Baltimore, MD,
 Trauma and Memory, Continuing Legal
 Education, Seattle, WA
 World Association of Detectives, Seattle, WA
 False Memory Syndrome Foundation
 Conference, Chicago, IL

2003

National Institute on Teaching of Psychology,
 St. Petersburg, FL (keynote)
 Center for Inquiry, Los Angeles, CA
 American Assn for Advancement of
 Science, Denver.
 National Legal Aid & Defender Assn, Austin,
 TX.
 Prevent Child Abuse-Orange Cty Orange, CA
 McGeorge School of Law (Lou Asch
 Memorial Lecture), Sacramento, CA
 New Century, Salon Speaker, Newport Beach,
 CA
 Newport Harbor Bar Assn, Newport Beach,
 CA
 University of Washington Law School, Seattle
 Biola University, La Mirada, CA
 CEO Roundtable, Half Moon Bay, CA
 Tenth Annual Undergrad Research
 Symposium (keynote), Irvine, CA
 University of California, San Diego, CA
 (Norman Anderson Endowed Lectureship)
 University of Colorado, Festschrift for Bourne,
 Kintsch, Landauer, Boulder, CO

American Psychological Society (Keynote),
Atlanta
Center for Inquiry-West, Inaugural Event
keynote speaker, Los Angeles, CA
Society for Applied Research in Memory and
Cognition, Aberdeen, Scotland (keynote)
European Psychology & Law Conference,
Edinburgh, Scotland
American Psychological Association
(Distinguished Award Address), Toronto
Texas Tech University, Lubbock, TX
Harbor Ridge Women's Group, Newport
Beach, CA
Lifelong Learning Academy, Irvine, CA
Science and Evidence Conf, City Hall, Irvine
Calif. Attorneys for Criminal Justice, SF, CA

2004

University of Lusiada, Lisbon, Portugal
University of California, Los Angeles, CA
Claremont Graduate University - Conference
on Applied Psychology
University of Southern California, CA
Town & Gown, Newport Beach, CA
Advanced Trial Skills Inst, Calif. Public
Defenders Assn, Palm Springs, CA
Catholic Univ. of Leuven, Belgium
L'Ecoles des Hautes Etudes en Sciences
Sociales (EHESS), Paris
Colorado College (Roberts Lecture), Colorado
Springs, CO
University of Colorado, Colorado Springs.
Rocky Mountain Psychological Assn,
Distinguished Speaker, Reno, NV
Western Psychological Association, Psi Chi
Distinguished Speaker, Phoenix, AZ
State Legislative Leaders Foundation &
University of Chicago, Chicago, IL
University of Illinois, Champaign-Urbana, IL
Center for Neurobiology of Learning &
Memory, Evening to Remember Talk.
National Child Abuse Defense & Resource
Center Annual Conference, Las Vegas, Nv.
University Synagogue (Holocaust Memories)
CA.
Arizona State University Law School, Tempe
Arizona State University Psychology Dept, AZ

2005

Orange County Stanford Assn, Newport, CA
SARMAC Bethschrift Meeting, Wellington,
New Zealand
RoddyFest, Purdue Univ., W. Lafayette, IN
University of Louisville, Grawemeyer Award
Speech, Louisville, KY
Persistence of Memory Conf. (Keynote),
Niagara City CC, NY.

Western Psychological Assn (Presidential
Address), Portland, OR
Stanford University (Festschrift for Gordon
Bower), Palo Alto, CA
University of Haifa, Israel
Sacred Heart Medical Center, Psychiatry,
(Bakker Retirement) Spokane, WA
Harbor-UCLA Medical Center, Psychiatry,
Grand Rounds, CA.
Calif. Judicial Branch Conf, San Diego, CA
San Diego Stanford Association, CA
Pavlovian Society, 50th Anniversary Meeting,
(keynote), CA
Athenaeum Lecture, Claremont McKenna, CA
National Academy of Sciences Sackler Colloq
on Forensic Sciences, Wash, DC.

2006

Bureau of Jewish Education, Laguna, CA
University of San Diego, Michael Haney
Distinguished Lecturer, Ca.
Calif. State University, Long Beach, Ca.
Inaugural Quinn Lecturer in Memory &
Consciousness, University of British
Columbia
Ireland Scholar Award Lecturer, University of
Alabama – Birmingham
Harvard University
National Academy of Sciences, Forensic
Science, Washington D.C.
Western Psych Assn, Palm Springs, Ca.
Association for Behavior Analysis,
Presidential Scholar Address, Atlanta, Ga
UC-Irvine-Commencement Address, Social
Ecology
University of Aberdeen, Scotland
John Damien Lecturer, University of Stirling,
Scotland
Mexican Congress of Psychology, Puerto
Vallarta, Mexico (plenary)
Rutgers University, New Brunswick, NJ
Beyond Belief, Salk Institute, Ca. (Invited
speaker), La Jolla, CA
Grand Rounds, Dept of Neurology, UCI-
Medical, Orange, CA
University of Calif, Office of the President,
Oakland, CA

2007

Western State Univ College of Law, Fullerton,
CA
Newkirk Center, Forensic Science, Costa
Mesa, CA
University of Arizona, Tucson, AZ
Munsterberg Conf, John Jay College of Crim
Justice, NY
Academic & Professional Women, UCI
National Academy of Sciences, Distinctive
Voices, Beckman Center, CA.

Serena Yang Distinguished Lecture,
University of Hong Kong
Women In Leadership, Annual Meeting,
Newport Beach, CA
Calif. State University - Long Beach,
Psychology Day Keynote Speaker, CA
Stanford University, Symbolic Systems
Distinguished Speaker, CA
Schneiderman Memorial Bioethics Lecture,
Biological Sciences, Beckman Center, CA
Federation of Defense & Corp Counsel,
Annual Meeting, Sun Valley, ID
George Sperling Festschrift, UCI, CA,
Watson Memorial Lecturer, Univ. of New
Hampshire, NH.
Forensic Science Conference, Public
Defenders, Los Angeles
International Women's Forum, Chicago
Behavioral Foundations of Policy Conf,
Princeton University, NJ
American Association of Universities, CA
NY State Judicial Institute, White Plains, NY
Centre Social I Cultural, Lleida, Spain.
CosmoCaixa Museum of Science, Madrid,
Spain.

2008

Calif. State University, Northridge (Richard
W. Smith Lecturer).
Univ. of South Florida, Doug Nelson
Festschrift, Tampa, FL.
Arizona State Univ. Law School, Tempe
Western Psych Assn, Irvine, CA
Nebraska Symposium on Motivation –
Emotion & Law, Lincoln, NE
International Conf on Investigative
Interviewing, Quebec Nationale Police
Academy, Nicolet, Canada.
Butler Pappas Sexual Tort Sem., Tampa, Fl.
European Association of Psychology & Law
(keynote), Maastricht, Netherlands
Annual Celebration Speech "Illusions of
Memory", University of Oslo, Norway
Psychology Department, University of Oslo
University of Louisville
Northern Lights Psychology Conference
(keynote), Grand Forks, ND
Tel-Aviv University, School of Law
Hebrew University, Jerusalem, Israel
George Mason Law School – Science in the
Courts Program for Judges, Fl

2009

Midwest Institute for Students & Teachers of
Psychology (Opening Key), Glen Ellyn, IL.
American Assn for Advancement of Science
(McGovern Award lecture), Chicago, IL.
American Psychology Law Society
(Presidential Speaker), San Antonio, TX

Teachers of Psychology, London
South West Psychology Conference (keynote)
London
Center for Inquiry, 12th World Congress,
Bethesda, Md.
Princeton University, NJ
Littler Class Action Conference, Phoenix, AZ
Council of Science Editors Annual Meeting,
(Keynote) Pittsburgh, PA
Canadian Psychological Assn (keynote),
Montreal
Chautauqua Institution, NY
UCI Foundation retreat, San Diego, CA.
University of Geneva (450th anniversary),
Aspen Institute, CO
Federal Bureau of Investigation, Virginia
Messe Memorial Lecture, Michigan State
Univ.
Trendsetters, Jewish Federation, Newport
Beach, CA.
Dickinson College (2009 Joseph Priestley
Award) PA
Canadian Lawyers, Toronto, Canada

2010

National Seminar on Forensic Evidence, San
Diego, Ca.
Memory & Law Workshop, Tucson, Az
ARCS Foundation, Irvine, Ca.
California Institute of Technology (William &
Myrtle Harris Distinguished Lectureship in
Science and Civilization), CA.
University of Texas, Austin
Society of Experimental Psychologists
(Warren Medal talk) Philadelphia, PA
University of Nevada, Reno
University Bonn, Germany
Institute of Community & Family Psychiatry,
McGill, Montreal, Canada.
Denison University (Anderson Lecture),
Granville, OH
CIA/BoozAllen: Face Recog, Herndon, VA.
Bronowski Art & Science Forum, The
Neurosciences Institute, La Jolla, CA
University of Southern California

2011

University of California, Santa Barbara
Orange County Stanford Assn, Newport, CA
Eastern Psychological Assn (Psi Chi
Distinguished Lecturer), Boston, Ma
Law and the Brain conference, New York
Law & Memory Conf, Stanford Law School
UCLA School of Law, CA
Rocky Mountain Psych Assn., (Psi Chi
Distinguished Lecturer) Salt Lake City, UT

British Psychological Society annual meeting,
Glasgow, Scotland (keynote)
Salon, The Pacific Club, CA
South West Psychology Conf. (keynote)
London
British False Memory Society, London
Clacton County High School, England
Univ of Sheffield, England
Assn of Teachers of Psychology, Hatfield,
England
The Amazing Meeting (TAM), Las Vegas
North Orange County Bar Assn, Ca.
Roosevelt University, Chicago
Japanese Psychological Assn, Tokyo (keynote)
Law School, University of Calif, Berkeley

2012

Pennsylvania Bar Institute
Nova Southeastern Univ, Ft. Lauderdale, Fl.
Distinguished Writing Lecture Series, UCI
Penn Conf of State Trial Judges, PA
Drexel University, Philadelphia, PA
Correctional Services Canada, Toronto
Suppes Symposium, Stanford, CA
Forensic Mental Health Assn of California,
Monterey, CA
Toronto International Film Festival (TIFF)
University of Ottawa
U.S. District Court of Nevada Annual Conf,
Reno
Ohio State University (Greenwald lecture)
Simon Fraser University, Canada
Kwantlen Polytech University, Canada
Center for Advanced Study Summit, Stanford
International Congress of Psychology,
(keynote- Cape Town, South Africa)
Monash South Africa University. Johannesburg
Orange County Traffic Investigators Assn
Grand Rounds, Dept of Psychiatry, UCI
FMSF Tribute, Philadelphia, PA
CSIcon 2012, Nashville
Claude Bernard Univ., Lyon, France
Mode d'Emploi Festival, Villa Gillet, Lyon,
France

2013

National Institute on the Teaching of
Psychology, FL
Harbor Ridge Women's Group, CA
Univ. of California, Davis
University of Washington (Edwards Lecture)
SouthWest Psychology Conf, , London
Goldsmiths, Univ of London
South Bank University, London
National Assn of Criminal Defense Lawyers,
Las Vegas
Midwestern Psych Assn, Chicago
Association for Psych Science, Wash DC
TedGlobal2013, Edinburgh, Scotland

European Congress of Psychology (keynote-
Stockholm 2013).
Int. Conf. on Critical Thinking and Education
Reform, Berkeley, Ca.
American Psych Assn, Award acceptance, HI
La Trobe University, Melbourne, Australia
TedX-Orange Coast, Newport Beach, CA
University of Missouri, Columbia, MO
Town & Gown, Irvine, Ca.
Psychonomic Society, Toronto (keynote)

2014

American Assn of Law Schools, NY
National Research Council Eyewitness
Committee (via videolink)
University of Michigan (Weinberg Neurolaw)
Southwestern Psychological Assn, San
Antonio, TX (keynote)
The California Club, Los Angeles
Northwestern Law School, Chicago
The Amazing Meeting (TAM), Las Vegas, NV
Foundation for Critical Thinking (Nader
event), Berkeley, Ca
Federal Court Clerk Assn, Seattle, WA
Trauma & Memory, Stockholm,
Sweden
What Matters To Me, and Why (UC-Irvine)
University of Arizona

2015

Duke University (via Skype)
Justice & Injustice Conf., UCI law
American Assoc.of Advancement of Science,
San Jose, CA
Society for Consumer Research, Phoenix
SouthWest Psychology Conf, , London
Goldsmiths University, London
Cornell University, Ithaca, NY (Award
lecture)
TedX-CIA (Central Intelligence Agency), Va
Radcliff Institute, Harvard Univ, (Dean's
Lecture), Ma
University of Akron (Benjamin Lecture), OH
John Jay College of Criminal Justice, NY
NAS-YouTube, Science Speed Date, Los
Angeles, CA
Foundation for Critical Thinking, Berkeley CA
Symposium Traumatic Memories, Forensic
Psychiatry Center & Hogrefe Publishers,
Helsinki, Finland
American Academy of Matrimonial Lawyers,
Newport Beach, CA
Forensic Psych Institute Launch, Goldsmiths,
University of London
Berlin Graduate School of Mind & Brain,
Humboldt University, Germany
United States District Court, Eastern District
Conference, Olympic Valley, CA

West Point Military Academy, NY (Class of 1951 Distinguished Lecturer)
 UC Conf on Social Science & Law
 Grawemeyer Celebration, Univ of Louisville
 CEM, International Congress, Tunisia
 (Honorary Chair) – via videoconference

2016

California State Univ, Dominguez Hills
 Western Psychological Assn (Distinguished speaker)
 Imagine No Religion, Vancouver, BC
 Contacts of Orange County, Irvine, CA
 American Humanist Assn, award speech, Chicago, IL
 Phi Beta Kappa Initiation, UCI
 Illex2016, Atlanta, Ga
 International Congress of Psychology, Yokohama, Japan 2016
 FBI, Violent Crime Beh Analysis, LA, CA
 Colorado State Univ, CO
 CsiCon Conference, Las Vegas, NV.
 Assn of Workplace Investigators, San Francisco, CA
 Univ of London, Goldsmiths
 Council of Scientific Society Presidents, DC

2017

SARMAC, Sydney, Australia
 LogiCal, Los Angeles, CA
 American Assoc for Advancement of Science
 SouthWest Psych Conf, London,
 Midwestern Psych Assn, Distinguished Psi Chi lecturer, Chicago
 UCEmeriti Assn
 International Congress on Social Responsibility, Universidad Santo Tomas, Bogota, Columbia
 Douglas College, Vancouver, Canada.
 Vancouver International Conf on Teaching of Psych, Vancouver, Canada
 Inn of Court, CA
 DRI Asbestos Medicine Conf, Las Vegas
 Internat Society for Neuroethics, Wash DC
 Erickson Foundation, Evolution of Psychotherapy Conf, , CA

2018

Rice University, Bochner Lecture, Austin, Tx
 Exploratorium, San Francisco
 Univ of Miami, SEEDS speaker, Fl.
 Western Univ of Health Sciences, Ca
 Cal State University, Fullerton (Psych Day!)
 Houston Bar Assn BarBench Conf, TX
 CNLM Conf, Huntington Beach (plenary)
 Western Psychological Assn, Portland, OR
 Albert Wolters Distinguished Lecture, Univ of Reading, England
 APS Teaching Conf., San Francisco, CA
 Max-Planck, Berlin, Germany

National Academy of Sciences BBCSS, counterfeiting, CA
 Amer Psych Assn annual meeting, San Fran
 Sierra College, Sacramento, Ca
 Millsaps College, Moreton Lecture, MS.
 Univeridad Nacional de Cordoba, Argentina
 Universidad Nacional Villa Maria, Argentina (police & prosecutors)
 Univ. of Iowa, Neuroscience Day (keynote)
 NACDL, Las Vegas, NV
 Wagenaar-Crombag Memorial, Netherlands
 University of Dublin, Ireland

2019

Jeeves Lecture, St. Andrews Univ, Scotland
 SouthWest Psychology Conf, London
 Origins Project Podcast, Phoenix, AZ
 University of Nevada, Reno
 Western Psych Assn, Pasadena, CA
 Science of Magic Assn, Chicago, Il
 Australian National University, Canberra
 Canberra Writers Festival, Australia
 Waikato Univ., New Zealand
 CSICon, Las Vegas, Nv.
 Stanford Alumni Assn, Orange Cty, CA

2020 (most via zoom)

Georgia Tech Univ, Atlanta
 Heterodox Academy, New York
 APA TOPSS (Teachers of Psychology in Secondary School)
 Newport Beach Public Library Fdn, Ca.
 Western Psych Assn annual meeting (keynote)
 University of California, San Francisco, (Fresno) Psychiatry Grand Rounds.
 University of New Mexico Health Sciences
 Erickson Foundation, Evolution of Psychotherapy, CA

2021 (most via zoom)

SouthWest Psychology Conf, London
 Prosecutors/Public Defenders, Haifa, Annual meeting, Israel
 NAS, Science & Entertain Exchange
 American Philosophical Society, Philadelphia
 Assoc for Behavior Analysis International-ABAI, (B.F. Skinner Lecture)
 Arizona State Bar Annual Convention
 International Congress of Psych, Prague, Czech

Forthcoming

National Assn of Crim Defense, Las Vegas
 Mt Sinai Psychiatry Dept, NY
 Bay Area Skeptics Conference
 Erickson Foundation
 Butler University (Woods Lecture), Indiana
 Aspire Psychology Conference, Doha, Qatar
 Australian National University
 Commencement

Revised: September, 2021

and former principals, officers, directors, stockholders, managers, members, partners, limited partners, trustees, beneficiaries, administrators, agents, employees, attorneys, predecessors, successors, assigns and affiliates, and any entities or individuals who are or have ever been engaged by (whether as independent contractors or otherwise), employed by, worked in any capacity for, or provided any services to Mr. Epstein, the Epstein Entities or the Epstein Estate (jointly and severally, the "Releasees"), from any and all claims, demands, actions, causes of action, suits, debts, dues, sums of money, accounts, variances, trespasses, damages and judgments, whether sounding in equity, tort, common law, contract, statute, regulation or otherwise and whether now existing, hereafter existing or revived in the future whatsoever in law, admiralty, equity or otherwise, including without limitation any and all claims or causes of action that arise or may arise from or which otherwise concern acts of sexual abuse by Mr. Epstein (the "Claims") which against the Releasees, Releasor ever had, now has or hereafter can, shall or may have, for, upon, or by reason of any matter, cause or thing whatsoever from the beginning of the world through the date of this General Release.

This General Release is a broad release of any and all Claims of Releasor against any and all Releasees, including without limitation any and all causes of action, lawsuits, claims, demands, damages and liability whatsoever, and also including without limitation to the extent of their respective liability for the same, any and all such claims against any and all Releasees for contribution as to any other person or persons who may be determined to have been joint tortfeasors arising out of or in any way related to any and all known and unknown personal injuries, and also including without limitation any derivative claims for loss of consortium, under any federal, state or local law, without limitation. This General Release is all-encompassing and is specifically made and given on the premise that any and all Claims by Releasor are hereby released and extinguished, whether said Claims arose in Florida, New Mexico, New York, the United States Virgin Islands, France or any other country, state, territory, possession or jurisdiction, or otherwise.

This General Release extends to released Claims that Releasor does not know or suspect to exist in her favor, which, if known by Releasor, would have materially affected her decision to enter into this General Release, and Releasor understands and agrees that she is releasing any and all such unknown or unsuspected Claims in Releasees' favor. Releasor acknowledges that she is familiar with Section 1542 of the California Civil Code, which provides as follows:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN

HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY.

Releasor expressly waives and relinquishes any right or benefit that Releasor has or may have under Section 1542 of the California Civil Code and under any other statute or legal principle with similar effect. In connection with such waiver and relinquishment, Releasor acknowledges that she is aware that, after executing this General Release, Releasor or Releasor's attorneys or agents may discover released Claims or facts in addition to, or different from, those which they now know or believe to exist with respect to the subject matter of this General Release, but that it is Releasor's intent hereby to fully, finally and forever settle and release all of the Claims, whether known or unknown, suspected or unsuspected, which now exist, may exist, or heretofore may have existed. In furtherance of this intent, this General Release shall be, and remain in effect as, a full and complete release of the Claims notwithstanding the discovery or existence of any such additional or different Claims or facts.

The Administrator of the EVCP has retained Garretson Resolution Group, Inc. d/b/a Epiq Mass Tort ("Epiq") to verify and resolve any lien or reimbursement claim that may be owed to Medicare Part A and/or Part B ("Medicare") and/or Medicaid with respect to compensation awarded to any participating claimant under the EVCP. If either entity asserts a lien or reimbursement claim, Epiq is hereby authorized to act on behalf of the EVCP to verify and resolve such lien or reimbursement claim. In the Claim Form, Releasor authorized the Administrator to use and/or disclose information as to Releasor for the resolution of Medicare and/or Medicaid liens. This includes providing to Epiq certain information as to Releasor, including: (1) first name, last name and middle initial, (2) Social Security number; (3) date of birth, (4) gender and (5) basic information regarding the nature of Releasor's Claims, and authorizing the Administrator and Epiq to use, exchange and report this information to Medicare and Medicaid, as may be necessary, for purposes of verifying and resolving Medicare and/or Medicaid liens and/or reimbursement claims and ensuring compliance with the Medicare Secondary Payer Act, 42 U.S.C. § 1395(y)(b), and its accompanying regulations. In the event that Epiq resolves the asserted claim or lien, the Epstein Estate will pay the negotiated amount in addition to any Compensation Offer determined by the Administrator.

Releasor represents and acknowledges that she is voluntarily and freely granting this General Release in exchange for payment of the Compensation Offer, and that she is legally competent to execute and deliver this General Release. Releasor further represents that she is represented by legal counsel and has received legal advice prior to

entering into this General Release and that she has been advised by said attorney regarding the terms and conditions of this General Release, which she has completely read and fully understands, including that accepting the Compensation Offer and signing this General Release is a full and final compromise, adjustment and resolution of any and all Claims that Releasor may now have or ever will have against Releasees.

Pursuant to the EVCP Protocol, the Administrator will maintain the confidentiality of all information and documentation relating to claimants who participate in the EVCP Program. This General Release does not require participating claimants to maintain such confidentiality and Releasor may -- at Releasor's voluntary and sole option -- disclose such information regarding the claims process and/or the Compensation Offer and any other information pertaining to her claim.

This General Release specifically does not include _____ as a Releasee or released party under this Agreement, and all parties expressly acknowledge, agree and understand that any and all claims that Releasor has or may have against _____ are expressly preserved.

Releasor represents and warrants that she has not assigned any Claims released pursuant to this General Release.

Releasor will dismiss with prejudice any and all legal actions -- whether lawsuits, probate claims or otherwise -- that Releasor has filed against any of Releasees, with each party to bear her, his or its own costs and attorneys' fees and will submit proof of dismissal to the Administrator along with or prior to the signed acceptance of the Compensation Offer and this executed Release.

This General Release contains the entire understanding of the Releasor and the Co-Executors of the Epstein Estate. Any modification of any of the provisions of this General Release shall be effective only if made in writing and executed by Releasor and the Co-Executors of the Epstein Estate with the same formality as this General Release.



Historical copy of register of title

Title number NGL343652 Edition date 20.03.1997

- This copy shows the entries in the register of title on 20 March 1997.
- This edition was last updated on 20 March 1997 at 09:31:00.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- For information about the register of title, see www.gov.uk/land-registry.
- This title is dealt with by HM Land Registry Durham Office.

A: Property register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

CITY OF WESTMINSTER

- 1 (10.01.1979) The Leasehold land shown edged with red on the plan of the above Title filed at the Registry and being 44 Kinnerton Street.
- 2 Short particulars of the lease(s) (or under-lease(s)) under which the land is held:
DATE : 22 December 1978
TERM : 60½ years from 29 September 1974
RENT : £100
PARTIES : 1.The Honourable Gerald Cavendish Grosvenor, John Nigel Courtenay James and Patrick Geoffrey Corbett
2.Bryan Alan Leybourne Popham and Joan Phyllis Popham
- 3 There are excepted from the effect of registration all estates, rights, interests, powers and remedies arising upon, or by reason of, any dealing made in breach of the prohibition or restriction against dealings therewith inter vivos contained in the Lease.

B: Proprietorship register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (20.03.1997) Proprietor: GHISLAINE NOELLE MARION MAXWELL care of M.C. Grumbridge, The Hogarth Group, Airedale Avenue, London W4 2NW.

B: Proprietorship register continued

2 (20.03.1997) The covenants implied under Part I of the Law of Property (Miscellaneous Provisions) Act 1994 in the disposition to the proprietor are modified.

End of register



13 December 2021

Your ref
zab/3369

Our ref
NGL343652/OC/178

HM Land Registry
Durham Office
PO Box 75
Gloucester
GL14 9BD

DX 321601 Gloucester 33
Tel 0300 006 0010
Fax NA
Email durham.office@landregistry.gov.uk
www.gov.uk/land-registry

Historical copy/copies

HM Land Registry payment ref 13/12 YHDM6HRG
Fee debited £3.00

The copy/copies of the historical edition(s) of the document(s) you applied for is/are enclosed.

These historical documents may not provide a complete record of all dispositions made because:

A single application may contain more than one disposition but only the final disposition may be reflected in the registered title.

More than one application may be processed at the same time but only the final disposition may be reflected in the registered title.

References may appear on the title plan that are not referred to in the register of title for the same date. These references will be referred to in later edition of the register of title.

If you have applied for every edition on a given date, but I have only enclosed one edition of the register of title and/or title plan, you may assume that there are no further editions for that date.

Please contact the HM Land Registry Office named if you have any questions about the enclosed historical copy/or copies.

zab/3369

NEXA LAW LIMITED
OFFICE 1
THE CHURCH OFFICES
SALOP ROAD
OSWESTRY
SHROPSHIRE
SY11 2NR



Historical copy of register of title

Title number NGL343652 Edition date 15.12.1992

- This copy shows the entries in the register of title on 15 December 1992.
- This edition was last updated on 15 December 1992 at 09:31:00.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- For information about the register of title, see www.gov.uk/land-registry.
- This title is dealt with by HM Land Registry Durham Office.

A: Property register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

CITY OF WESTMINSTER

- 1 (10.01.1979) The Leasehold land shown edged with red on the plan of the above Title filed at the Registry and being 44 Kinnerton Street.
- 2 Short particulars of the lease(s) (or under-lease(s)) under which the land is held:
DATE : 22 December 1978
TERM : 60½ years from 29 September 1974
RENT : £100
PARTIES : 1.The Honourable Gerald Cavendish Grosvenor, John Nigel Courtenay James and Patrick Geoffrey Corbett
2.Bryan Alan leybourne Popham and Joan Phyllis Popham
- 3 There are excepted from the effect of registration all estates, rights, interests, powers and remedies arising upon, or by reason of, any dealing made in breach of the prohibition or restriction against dealings therewith inter vivos contained in the Lease.

B: Proprietorship register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (30.06.1986) Proprietor: JOHN GERARD O'NEILL and NESSA O'NEILL his wife, both of Stratton Audley Hall, Stratton Audley, Oxfordshire.

B: Proprietorship register continued

- 2 The covenants implied under section 24(1)(a) of the Land Registration Act 1925 in the Transfer to the proprietor are modified.
- 3 (30.06.1986) RESTRICTION: No disposition by a sole proprietor of the land (not being a trust corporation) under which capital money arises is to be registered except under an order of the registrar or of the Court.

End of register

4. Government Exhibit 14 is a true and correct certified copy of a birth certificate reported to Sacramento County, California. Government Exhibit 14 accurately reflects the date of birth of the person named on the certificate.

5. Government Exhibit 15 is a true and correct certified copy of a birth certificate reported to the Massachusetts Department of Public Health. Government Exhibit 15 accurately reflects the date of birth of the person named on the certificate.

6. Government Exhibit 16 is a true and correct copy of a birth certificate reported to the General Register office of England and Wales. Government Exhibit 16 accurately reflects the date of birth of the person named on the certificate.

Document Produced in Native Format

Palm Beach House MaintenanceTrash Collection

Monday to Friday once a day, any time between 6am and 5pm

Recycling

Every Thursday Morning, any time between 6am and 12pm

Mail delivery

Sent Monday and Thursday to New York office

Fedex

800 463 3339

Account #114420816

Nearest drop off – Box next to P.B. National Bank on Worth Ave.

Plumbing

General Plumbing

561 585

Call: *Mike*

Electrician

Energy Efficient Electric Inc.

561 655

Also: *Lenny* (see outdoor lighting below)

Painter

Bill

954 675

Carpenter

Erwin

561 994

Upholsterer

Frank Jennings

561 965

Carpet Cleaning

Stanley Steamers (wall to wall)

561 586

Merry Rugs Cleaners (area rugs)

561 588

A/C repairs

John C. Cassidy

561 833

Filters cleaned 1st week of every month. They call. 1 ½ hours approx.

Outdoor lighting*Lenny* (also Electrician)

561 239 [REDACTED]

Locksmith

Wilson and Rowan

561 655 [REDACTED]

Alarm system

Benham Industries Inc

Call: *Keith*

954 491 [REDACTED]

Gates

Reich Metal Fabricators Inc.

561 585 [REDACTED]

Back door gate switch: above garage door controls. When open, round red light is on.

Front door gate switch: in telephone outlet, above kitchen telephone area.

Garage door repairs

The Door Smith Inc.

561 391 7768

Telephones

Southern Bell (repairs)

561 780 2355

Internal phone system (N.E.C.)Repair/programming: *Steve*

561 881 [REDACTED]

Washer/Drier Servicing

New Washers: Maytag PM Commercial

New Driers: Maytag MDG-30 Fast Dry

800 MAC GRAY

Cable TV

Adelphia Cable

561 478 8300

Bottled Water Company

Bishop Water Co. Inc.

561 582 1367

Storage

Storage USA

5580 Ockeechobee Blvd.

Unit 6218

561 683 5835

PALM BEACH HOUSE MAINTENANCE

Car Maintenance

Mercedes of Palm Beach 561 689 6363
4000 Okeechobee Blvd.
Service advisor: Sean

Roger Dean Chevrolet 561 683 8100
2235 Okeechobee Blvd.

Auto Repairs
Nestor Auto 561 835 0809
2600a Florida Ave

Car Detailing
Palm Beach Car Wash and Auto Detailing 561 835 8748
1229 N. Dixie Highway @ Amoco Gas

Taxi Service
Limo. / Town car 561 966 6920
Call: *Dan Tischien*

Shops**Food and general household items**

Publix 561 655 4120
265 Sunset Ave.

Gourmet Food

C'est si bon 561 659 6503
289 Sunset Ave.

Carmines 561 775 9233
2401 PGA Blvd.

Herberts Lafayette 561 655 6545
155 N. County Rd

Newspapers

Main St. News 561 833 4027
255 Royal Poinciana Way

Office supplies

Home Depot 561 478 0783
Okeechobee Blvd

Hardware

Sewell Hardware 561 832 7171
528 Clematis St.

Post office

401 South County Rd 561 832 0697

OutsidePool Maintenance

Hackl Pool Service

561 588 7493

Every Monday and Thursday, no set time. They put chemicals in the pool and clear it of debris

Pool Heating

National Pool Service

561 585 8866

Call as needed

Pest Control

Palm Beach Exterminator

561 689 [REDACTED]

Call: *Ken*

Comes the first day of each month. They call. Takes 15 minutes approx.

Irrigation

Dolphins Sprinkle

561 844 8082

Landscape Spraying

Academy Services

561 478 4629

Alan Stopeck contacts them whenever it is necessary.

Tree Trimming

County Wide Tree Service

561 371 5786

They come twice a year as needed, usually summer and winter.

June 01, 2007 -
June 29, 2007

Page 2 of 4

AIR GHISLAINE INC

Primary Account Number: [REDACTED] 4324

JPMorgan
Private Bank

Business Checking

Account Number [REDACTED] 4324
AIR GHISLAINE INC

Summary

Opening Balance	\$32,133.42
Deposits and Credits	\$7,550,000.00
Checks, Withdrawals and Debits	\$7,381,076.71
Ending Balance	\$201,056.71

Activity

Date	Description	Debit	Credits	Balance
Opening Balance				\$32,133.42
Jun 12	Book Transfer Credit B/O BELL HELICOPTER TEXTRON FT WORTH TX 76101 REF 417 DEPOSIT REFUND		\$50,000.00	\$82,133.42
Jun 18	Internal Funds Transfer FUNDS TRANSFERRED FROM DDA AC# [REDACTED] [REDACTED] 6312 TO DDA AC# [REDACTED] 4324 As requested		\$7,400,000.00	\$7,482,133.42
Jun 18	Book Transfer A/C SIKORSKY AIRCRAFT CORP STRATFORD CT 06614 1378 ORG: [REDACTED] 4324 AIR GHISLAINE INC REF RE PURCHASE OF A GREEN HELICOPTER SIKORSKY S76C AND DOWNPAYMENT ON EXECUTIVE FINISH	\$7,352,825.00		\$129,308.42
Jun 22	Internal Funds Transfer FUNDS TRANSFERRED FROM DDA AC# [REDACTED] [REDACTED] 6312 TO DDA AC# [REDACTED] 4324 As requested		\$100,000.00	\$229,308.42
Jun 22	Check Paid # 1036	\$2,570.00		\$226,738.42
Jun 25	Check Paid # 1037	\$5,487.59		\$221,250.83
Jun 25	Check Paid # 1038	\$14,706.53		\$206,544.30
Jun 25	Check Paid # 1039	\$5,487.59		\$201,056.71
		\$7,381,076.71	\$7,550,000.00	
Ending Balance				\$201,056.71

Checks Paid

Check	Date	Amount	Check	Date	Amount	Check	Date	Amount
1036	Jun 22	\$2,570.00	1038	Jun 25	\$14,706.53			
1037	Jun 25	\$5,487.59	1039	Jun 25	\$5,487.59			

June 01, 2007 -
June 29, 2007
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AIR GHISLAINE INC
Primary Account Number: [REDACTED] 4324



Business Checking
Account Number [REDACTED] 4324
AIR GHISLAINE INC

(cont.)

Total Checks	\$28,251.71
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Enclosed Checks: 4

Fees and Charges for Business Accounts

We value your relationship with JPMorgan Private Bank. You were not charged for services this statement period. Thank You.

June 01, 2007 -
June 29, 2007

AIR GHISLAINE INC

Primary Account Number: [REDACTED] 4324

JPMorgan 
Private Bank

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Important Information about Your Statement

Accounts are subject to the General Terms For Accounts and Services and applicable appendices and account agreements. Your accounts, unless otherwise indicated on the statement, are held by JPMorgan Chase Bank, N.A. (the "Bank").

Deposit accounts held at the Bank, including checking, savings, CD, and money market accounts, are FDIC insured.

In Case of Errors or Questions About Your Electronic Funds Transfers (personal accounts only)

Telephone or write to the Bank if you think your statement or receipt is wrong, or if you need more information about an electronic transaction on a statement or receipt. The phone number for inquiries is printed on the front of this statement. The address for inquiries appears below. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

- Tell us your name and account number.
- Describe the error or the transfer you are unsure about, and explain as clearly as you can why you believe it is an error or why you need more information.
- Tell us the dollar amount of the suspected error.

Please direct all inquiries to your Morgan Account Officer at
JPMorgan Private Bank Client Service
500 Stanton Christiana Road, 1/OPS3
Newark, DE 19713-2107

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days to do this (20 business days for transactions outside the U.S. and point-of-sale transactions) we will recredit your account for the amount you think is in error so that you will have use of the money during the time it takes us to complete our investigation.

In Case of Errors or Questions About Non Electronic Transfers

Please examine your account at once. If you feel an error has taken place or have questions concerning a non electronic transaction, telephone or write us within 30 days. The phone number is printed on the front of this statement. The address appears above. If no report is received within this period, your account will be considered correct.

Mutual Funds/Securities

Securities (including Mutual Funds) and annuities are not bank deposits and are not FDIC insured nor are they obligations of or guaranteed by JPMorgan Chase Bank, N.A. or its affiliates or any federal or state government or government agency or government sponsored agency. Securities (including mutual funds) and annuities involve investment risks, including the possible loss of the principal amount invested.

The distributor of the JPMorgan Funds is JPMorgan Distribution Services, Inc., which is an affiliate of JPMorgan Chase Bank, N.A.. JPMorgan Chase Bank, N.A., and its affiliates receive compensation from JPMorgan Funds for providing services. Read the JPMorgan Funds prospectuses carefully for details, including fees and expenses, before investing or sending money.

JPMorgan Select Shares of the Connecticut Daily Tax Free Income Fund, Inc. and JPMorgan Select Shares of the New Jersey Daily Municipal Income Fund, Inc. are not part of, or affiliated with, the JPMorgan Family of Mutual Funds. Reich & Tang Distributors Inc. and Reich & Tang Asset Management L.P., which are unaffiliated with JPMorgan, are the funds' distributors and investment advisor, respectively. Reich & Tang Distributors Inc. is a member NASD.

IRA Accounts

Accounts where the Bank serves as trustee or as discretionary investment manager for an ERISA plan or an IRA that hold Fiduciary Shares (as described below) do not bear any portion of investment, administrative, custodian or other charges paid to the Bank or its affiliates for services to the applicable JPMorgan Funds since these charges are subject to rebate as defined below. For accounts where the Bank serves as trustee, or discretionary investment manager for an ERISA plan or an IRA, which hold shares in the JPMorgan Funds other than Fiduciary Shares, the Bank receives fees for services from the JPMorgan Funds but waives account fees with respect to the funds so held. Fiduciary Shares are shares in the Select Shares class of JPMorgan Tax Aware Large Cap Value Fund, JPMorgan US Equity Fund, JPMorgan Tax Aware US Equity Fund, JPMorgan Tax Aware Large Cap Growth Fund, JPMorgan Mid Cap Equity Fund, JPMorgan Trust Small Cap Equity Fund, JPMorgan Fleming International Equity Fund, JPMorgan Short Term Bond Fund II, JPMorgan Bond Fund II, JPMorgan Tax Aware Enhanced Income Fund, JPMorgan Tax Aware Short-Intermediate Income Fund, JPMorgan Intermediate Tax-Free Income Fund, JPMorgan Tax-Free Income Fund, JPMorgan California Bond Fund, JPMorgan NY Intermediate Tax Free Income Fund and JPMorgan NJ Tax Free Income Fund held in the Bank's trust accounts or in the Bank's investment management accounts for ERISA plans or IRAs. "Rebate" means an amount returned by the Bank to the account which holds the Fiduciary Shares. The rebate amount represents the portion of servicing fees paid to the Bank by the mutual fund with respect to Fiduciary Shares.

June 01, 2007 -
June 29, 2007

Ghislaine Maxwell

Primary Account Number: 6312

JPMorgan
Private Bank

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Premier Checking

Account Number 6312

Ghislaine Maxwell

Summary

Opening Balance	\$149,704.20	Average Balance	\$937,555.13
Deposits and Credits	\$7,634,946.28	Interest Paid this Period	\$1,774.31
Checks, Withdrawals and Debits	\$7,663,408.95	Interest Paid Year to Date	\$2,721.51
Ending Balance	\$121,241.53	Annual Percentage Yield	2.33%

Activity

Date	Description	Debit	Credits	Balance
Opening Balance				\$149,704.20
Jun 06	Deposit 140061161		\$9,025.00	\$158,729.20
Jun 06	Check Paid # 1060	\$620.00		\$158,109.20
Jun 06	Check Paid # 1062	\$400.00		\$157,709.20
Jun 07	Electronic Funds Transfer NES LLC Re: PAYROLL Ref: 250010103529TPW		\$6,599.20	\$164,308.40
Jun 07	Electronic Funds Transfer CWB TRANSFER Re 22495331 Ref: 44842831		\$105,000.00	\$269,308.40
Jun 08	Check Paid # 1061	\$7.00		\$269,301.40
Jun 12	Check Paid # 1065	\$190.00		\$269,111.40
Jun 12	Check Paid # 1066	\$4,947.00		\$264,164.40
Jun 12	Check Paid # 1067	\$1,133.00		\$263,031.40
Jun 12	Check Paid # 1068	\$1,396.00		\$261,635.40
Jun 14	Check Paid # 1069	\$1,842.00		\$259,793.40
Jun 15	Fedwire Credit VIA: MELLON BANK N.A. DUE FROM BK M /043000261 B/O JEFFREY EPSTEIN ST THOMAS VI 00802 1348 REF CHASE NYC/CTR/BNF GHISLAINE MA XWELL NEW YORK NY 10022 /AC 0000000 07391 RFB O/B MELLON BANK BBI /TIME /15 32 IMAD 0615D3QCI20C005971		\$7,400,000.00	\$7,659,793.40
Jun 18	Internal Funds Transfer FUNDS TRANSFERRED FROM DDA AC# 6312 TO DDA AC# 4324 As requested	\$7,400,000.00		\$259,793.40
Jun 20	Check Paid # 1064	\$10,000.00		\$249,793.40
Jun 21	Electronic Funds Transfer NES LLC Re PAYROLL Ref: 576006255108TPW		\$6,599.20	\$256,392.60
Jun 22	Deposit 140061164		\$948.57	\$257,341.17