

Jane Doe #6


v.

Jeffrey Epstein

AFFIDAVIT OF RICHARD C.W. HALL, M.D.

STATE OF FLORIDA

COUNTY OF SEMINOLE

On this day personally appeared before me, the undersigned authority, Richard C.W. Hall, M.D., who, being by me first duly sworn under oath deposes and says:

1. My name is Richard C.W. Hall, M.D. I am over the age of majority, and make this affidavit and declaration upon the basis of personal knowledge of the factual matters contained herein.

2. I have maintained a private practice in psychiatry and forensic psychiatry since 1996.

3. I, also, currently serve as a Courtesy Clinical Professor of Psychiatry at the University of Florida, College of Medicine, Gainesville, Florida; Affiliate Professor, Dept of Psychiatry and Behavioral Medicine, University of South Florida; and Professor of Psychiatry, Department of Medical Education, University of Central Florida College Medicine.

4. I received my undergraduate degree from the Johns Hopkins University and

"F"

medical degree from the University of Florida College of Medicine, Gainesville, Florida.

5. I served as a Lieutenant Commander in the United States Navy, where I researched and evaluated biological and neurochemical factors associated with the onset of psychiatric disorders and served as a representative to the Joint Services Task Force planning *Operation Homecoming*, the return of POW's from Vietnam.

6. I have previously served as an assistant clinical professor at the University of South Florida College of Medicine, directed one of the ten model mental health centers in the United States, and served as a medical consultant to the Kennedy Space Center.

7. I am a former member of the academic faculty at the University of Texas, in Houston, Texas where I served as Assistant Professor and then Associate Professor of Psychiatry and Internal Medicine, Director of Clinical Research, Director of Residency Training, Chief of the Consultation/Liaison Service, and Chief Psychiatrist at the M.D. Anderson Cancer Hospital in Houston.

8. I, also, have served as a Professor of Internal Medicine and Psychiatry at the Medical College of Wisconsin where I was appointed Chief of Psychiatry at the Milwaukee County and Froedtert Hospitals.

9. In addition, I have served as a Professor of Psychiatry and Internal Medicine and Associate Dean at the University of Tennessee College of Medicine, Memphis.

10. The amended complaint filed by Jane Doe #6 against Jeffrey Epstein makes

sensitive allegations of sexual assault and abuse upon a minor and seek damages in excess of \$50 million. Jane Doe #6 alleges confusion, shame, humiliation, embarrassment, and severe psychological and emotional injuries. It is further alleged that she suffered, and will continue to suffer, severe and permanent traumatic injuries, including mental, psychological, and emotional damages.

11. She alleges the intentional infliction of emotional distress and that Mr. Epstein's conduct caused severe emotional distress, severe mental anguish and pain.

12. She further alleges that she has suffered personal injury including mental, psychological and emotional damage.

13. Plaintiff's counsel has retained an expert witness, Dr. Kliman of the Psychological Trauma Center, a division of Preventive Psychiatry Associates Medical Group, Inc., of San Francisco, California, of which Gilbert W. Kliman, MD, is the medical director. Dr. Kliman's initial records indicate the following concerning Jane Doe #6.

14. Plaintiff's interrogatories note a diagnosis of PTSD following an auto accident in 2003. (Pre-Epstein) (Page 5, Plaintiff's Answers to Defendant's First Interrogatories)

15. Plaintiff noted "nervous about driving here. Hit by a semi June 2003. I wasn't hurt but Mom was." (Page 1, GK Contemp notes, Interview Part 1)

16. "Seroquel . . . for bad dreams after the car accident. . . longest therapy six months court ordered. I am on probation for stupid stuff I did 2-3 years ago. . . really

dumb, I got in trouble, arrested." (Page 2, GK Contemp notes)

17. A Petition for Involuntary Assessment for Substance Abuse, dated July 19, 2006, noted a domestic disturbance at plaintiff's home with "threats to several family members as well as threats of suicide. . . appeared to be under the influence of Zanax [sic] bars. . . She found her grandmother dead three weeks ago, may have pushed her over the edge." (Page 1, Petition for Involuntary Assessment for Substance Abuse, Circuit Court of the 15th Judicial Circuit in and for Palm Beach County, Florida). On January 31, 2007, Plaintiff pled guilty to grand theft and burglary, and was sentenced to a 30-day substance abuse program, 9 months community control, and 2 years probation. On February 25, 2007, Plaintiff cutoff her monitoring bracelet and fled her residence violating probation. She was arrested on March 9, 2007 and April 2, 2007 and was ordered to undergo a mental health evaluation. On August 8, 2007, she was arrested for possession of drug paraphernalia and violated her probation again. She was in jail for a period of 30 days until September 6, 2007 when she was found guilty of the violation of probation and sentenced to remain in jail for evaluation and treatment and then outpatient treatment as well as parenting classes.

18. A Notice of Related Case reports an incident of the plaintiff being charged with possession of a weapon on school property in November 2004. (Page 2, Notice of Related Case, Circuit Court of the 15th Judicial Circuit in and for Palm Beach County,

Florida)

19. On 4/13/06, in response to a call of child abuse, an officer received a report from DCF noting that "since the age of 13, Plaintiff has been smoking marijuana with her father every other day. . . Mom is aware of (blacked out) smoking marijuana with dad. . . She placed her daughter in Growing Together Treatment Center on 3/10/06. Then Baker Acted her on 4/ 7/06 to (blacked out)." (Police Offense Report)

20. On 4/12/05, police responded to a domestic violence call, which involved plaintiff and her brother kicking and hitting each other at their residence. (Police Offense Report)

21. A police report of 5/24/04 notes that police responded to a delayed battery charge, in which the plaintiff was involved in a verbal argument with a friend who then punched the plaintiff with a closed fist to the forehead area. (Police Offense Report)

22. A police report of 11/22/03 noted a physical altercation involving the plaintiff and another individual, which resulted in the plaintiff being struck in her left eye with a closed fist. (Police Offense Report)

23. On 3/02/03, police responded to a call of a suspicious person at the plaintiff's residence. The plaintiff reported that when she entered her shed to do her laundry, she came in contact with an unknown male, who had some of her underwear inside his mouth. She reported that the male took the underwear out of his mouth, put them in the dryer, and

then ran away. (Police Offense Report)

24. A police report notes an incident of 8/27/02 in which plaintiff was followed home from school by four girls and allegedly battered by two of the girls subsequent to a verbal conflict at school. (Police Offense Report)

25. "I met Mr. Jeffrey August 2004. . . I was between repeating sixth grade. . . I was not yet 14. [REDACTED] came to my house to get me to go and we called a cab to go to Jeffrey's. She told me I had to tell him a different age, 16 or over because I wouldn't get paid." (Page 1, GK notes)

26. Plaintiff reported, "I wasn't a virgin. I might have had sex with one person. I was around 13 or 14 that I lost my virginity with a little kid, a childhood friend." (Page 2, GK notes)

27. "I smoked some weed during the Xanax. . . drank a little but not into it." (Page 2, V Alvarez wi GK III, 12/6/08)

28. Plaintiff reported "Cause I don't like the way it made me feel and I'd fall asleep on it and yea . . . that's a little bit after I got into that car accident, that's 2006. I started getting bad dreams and they started taking me to therapists and I started getting like anxiety attacks in the car . . It was bad. . . that's the longest therapist I've ever seen and that was because it was court ordered." "I went to her like six months." (Page 9, Tape 1)

29. Question: "Have you been more irritable since this happened to you?"

Plaintiff response, "I don't know." (Page 12, Tape 3).

30. Plaintiff failed to report to Dr. Kliman that on April 10, 2005 she witnessed a friend get electrocuted. On December 22, 2006, Plaintiff got into a fight with her then-boyfriend, who had been out all night, and the boyfriend went out in the street in front of their house and put a gun to his head and killed himself.

31. All of the above show that this plaintiff came from an unstable and disturbed home, had been subject to previous physical and sexual abuse, was fearful, isolated, and had had suicidal ideation prior to meeting Mr. Epstein. For further elaboration of her history and background, access to all available records is crucial if one is to fully understand the impact of any of these events on her subsequent behavior and proportion the impact of specific events, if any, or her current and future level of function.

32. In Dr. Kliman's initial replenishment retainer agreement and fee schedule (date 7/18/08), in a heading entitled "Regarding Full Disclosure," Dr. Kliman notes that prior to deposition, counsel will make every effort necessary to provide experts with information requested by the experts including: 1) a list of all depositions, statements, declarations, and motions in the case, 2) a copy of any requested items, and 3) most importantly, a list of all medical, clinical, school, and work records known to the attorney in the case.

33. Dr. Kliman notes on page 8 of his contract opinion formation that he will not

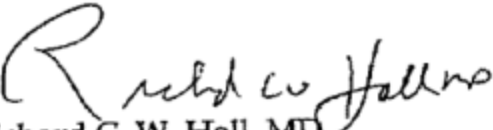
form opinions, give reports, or testify in certain circumstances. These include circumstances where he has reason to believe a retaining attorney has "available important and relevant documents which are being deliberately withheld from us." "We define such as documents in possession of retaining attorney, which we have requested or that we have stated would ordinarily be part of medical opinion formation on the topics concerning, which our input is requested." We request the same.

34. It is critical for an IME examiner to be able to make a cogent assessment of any plaintiff and to understand their medical, social, academic, psychological and psychiatric condition/state prior to any act of alleged victimization. There are a number of variables that combine to determine the effects of such alleged victimization, including the type and character of the alleged assault, and key victim variables such as demographics, psychological reactions at the time of the trauma, previous psychiatric or psychological history, previous victimization history, current or previous psychological difficulties, and general personality dynamics and coping style, as well as sociocultural factors such as drug use/abuse; poverty; social inequity and/or inadequate social support; any previous history of abuse within or outside the family; whether individuals were abused by strangers, acquaintances or family members; and whether there was any history of indiscriminate behavior that may have placed them at increased risk. It is important to know if there had been previous sexual conduct, contact with police or welfare agencies, alcohol or drug

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use/abuse, voluntary sexual activity, contraceptive use, genital infections, or apparent indifference to previous abuse.

35. It is also essential to understand the plaintiff's level of emotional support, whether any significant psychiatric illnesses were present, whether they were taking any medications (prescribed or non-prescribed), whether there had been previous suicide attempts, thoughts, plans, etc.

Respectfully submitted,


Richard C. W. Hall, MD

Courtesy Clinical Professor of Psychiatry, University of Florida, College of Medicine

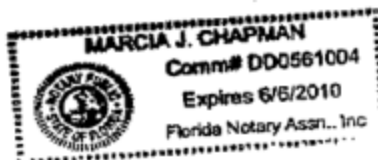
Affiliate Professor, Department of Psychiatry and Behavioral Medicine, University of South
Florida

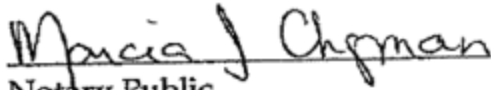
Professor of Psychiatry, Department of Medical Education, University of Central Florida
College of Medicine

STATE OF FLORIDA
COUNTY OF SEMINOLE

BEFORE ME, the undersigned authority, personally appeared **RICHARD C.W. HALL, M.D.**, who is (☒) personally known to me or () who has produced _____ as identification, and who did take an oath, deposes and says that the attached Affidavit is true and correct to the best of his knowledge and belief.

SWORN TO AND SUBSCRIBED before me on this 4th day of August
2009.




Notary Public
Printed Name: MARCIA CHAPMAN
My Commission Expires: