

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 08-80736-Civ-Marra/Matthewman

JANE DOE #1 AND JANE DOE #2,

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.

UNITED STATES' NOTICE OF FILING SECOND SUPPLEMENTAL PRIVILEGE LOG

Pursuant to the Court's June 18, 2013 Omnibus Order (DE 190), the Respondent, United States of America, by and through the undersigned Assistant United States Attorney, hereby gives notice of its filing of its Second Supplemental Privilege Log. The index has been marked with Bates Numbers P-013970¹ thru P-014923.

The documents referenced in the Second Supplemental Privilege Log will be delivered today to the Chambers of U.S. District Judge Kenneth A. Marra for *ex parte in camera* review, pursuant to the Court's Omnibus Order.

Respectfully submitted,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

By: s/A. Marie Villafaña
A. MARIE VILLAFANA
Assistant United States Attorney
Florida Bar No. 0018255
500 South Australian Ave, Suite 400
West Palm Beach, FL 33401
Telephone: 561-820-8711
Facsimile: 561-820-8777
ann.marie.c.villafana@usdoj.gov

¹ Please note that, while preparing the Second Supplemental Privilege Log, the undersigned discovered an error on the Supplemental Privilege Log, that is, the last entry states that the last document bears Bates Numbers P-013956 thru P-013846. The correct Bates range for that document is P-013956 thru P-013969 [14 pages].

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 23, 2015, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. According to the Court's website, counsel for all parties are able to receive notice via the CM/ECF system.

s/A. Marie Villafaña
A. MARIE VILLAFANA
Assistant United States Attorney

SERVICE LIST

Jane Does 1 and 2 v. United States,
Case No. 08-80736-CIV-MARRA/MATTHEWMAN
United States District Court, Southern District of Florida

Brad Edwards, Esq.,
Farmer Jaffe Weissing Edwards Fistos Lehrman
425 N Andrews Ave Ste 2
Fort Lauderdale, FL 33301-3268
brad@pathtojustice.com
954-524-2820
Fax: 954-524-2822

Paul G. Cassell
S.J. Quinney College of Law at the
University of Utah
332 S. 1400 E.
Salt Lake City, Utah 84112
(801) 585-5202
Fax: (801) 585-6833
E-mail: casselp@law.utah.edu

Attorneys for Jane Doe # 1 and Jane Doe # 2

JANE DOE v. UNITED STATES
COURT FILE NO. 08-80736-CV-MARRA
SECOND SUPPLEMENTAL PRIVILEGE LOG – BOX #4

Bates Range	Description	Privilege(s) Asserted
P-013970 thru P-013971	11/29/2006-12/1/2006 emails between Marie Villafaña and prison employee regarding attempted contact with potential witness	Work Product Investigative Privilege Privacy Act
P-013972	5/18/2007 email from Marie Villafaña to Matt Menchel informing him of intent to subpoena Roy Black's private investigator and steps taken to obtain DOJ authorization	Work Product 6(e) Deliberative Process Investigative Privilege
P-013973 thru P-013976	5/18/2007 emails between Marie Villafaña and expert witness regarding securing pre-indictment consultation contract	Work Product 6(e) Investigative Privilege
P-013977 thru P-013979	5/21/2007 email from Marie Villafaña to Myesha Braden (CEOS) re 2423(b) charging question	Work Product 6(e) Deliberative Process Investigative Privilege
P-013980	5/21/2007 email from Marie Villafaña to Matt Menchel and Jeff Sloman regarding guidance on grand jury presentation	Work Product 6(e) Deliberative Process
P-013981	5/22/2007 email from Andy Lourie to Matt Menchel and Jeff Sloman (cc: Marie Villafaña) re letter received from Gerald Lefcourt discussing a meeting to discuss Epstein investigation	Work Product Deliberative Process
P-013982	5/23/2007 email from Jason Richards to Marie Villafaña re extradition research	Work Product A/C privilege Investigative Privilege
P-013983 thru P-013984	5/23/2007 emails between Karen Atkinson and Marie Villafaña regarding decision to meet with counsel for Epstein	Work Product Deliberative Process

Bates Range	Description	Privilege(s) Asserted
P-013985 thru P-013989	6/14/2007-6/21/2007 emails between Marie Villafaña, Karen Atkinson, Andrew Lourie, Matt Menchel, and Jeff Sloman regarding addendum to Pros Memo, grand jury presentation and changes to indictment, and meeting with counsel for Epstein	6(e) Work Product Deliberative Process Investigative Privilege
P-013990 thru P-013991	6/26/2007 email from Marie Villafaña to Jeff Sloman, Matt Menchel, and Andrew Lourie addressing arguments regarding interstate nexus for 2422(b) charges	Work Product Deliberative Process
P-013992 thru P-013994	7/3/2007-7/4/2007 emails between Marie Villafaña and Andrew Lourie regarding extension of time to respond to subpoenas requested by Lilly Ann Sanchez and possible resolution of case	6(e) Work Product Investigative Privilege Deliberative Process
P-013995 thru P-014010	6/12/2007-7/6/2007 series of emails between Marie Villafaña and AUSAs Serene Nakano and James Cott re an earlier unrelated investigation of Epstein	Work Product Investigative Privilege Privacy Act
P-014011 thru P-014025	7/3/2007-7/13/2007 email chain between Matt Menchel and Marie Villafaña regarding disagreement on Menchel's plea negotiations and written request for meeting between USAO management and victims	6(e) Work Product Deliberative Process Investigative Privilege
P-014026 thru P-014027	7/16/2007 email from Marie Villafaña to Matt Menchel and Andrew Lourie regarding correspondence from Roy Black and Motion to Quash	6(e) Work Product Deliberative Process Investigative Privilege
P-014028 thru P-014030	7/18/2007 emails from Marie Villafaña to Andrew Lourie and Matt Menchel regarding Motion to Quash grand jury subpoena and supporting affidavit filed by Roy Black	6(e) Work Product Deliberative Process Investigative Privilege
P-014031 thru P-014032	7/19/2007 email chain between Marie Villafaña, Andrew Lourie, Matt Menchel, S/A Jason Richards and S/A Eliasib Ortiz regarding potential service of target letters	6(e) Work Product Deliberative Process Investigative Privilege Attorney-Client Privilege

Bates Range	Description	Privilege(s) Asserted
P-014033	7/19/2007 email from Marie Villafaña to Andrew Lourie and Matt Menchel regarding planned service of target letters	Work Product 6(e) Investigative Privilege Deliberative Process
P-014034	7/26/2007 email from Marie Villafaña to Matt Menchel and Andrew Lourie regarding proposed changes to the indictment	6(e) Work Product Deliberative Process Investigative Privilege
P-014035	7/31/2007 email from Marie Villafaña to Jeff Sloman, Matt Menchel, and Andrew Lourie summarizing proposed plea terms as per Menchel recommendation	Work Product Deliberative Process
P-014036	7/31/2007-8/2/2007 email chain between Jeff Sloman, Matt Menchel, Andrew Lourie, and Marie Villafaña regarding plea negotiations	Work Product Deliberative Process Investigative Privilege
P-014037	8/2/2007 email from Marie Villafaña to Jeff Sloman, Matt Menchel, and Andrew Lourie with draft response to Epstein counsel regarding agreement	Work Product Deliberative Process Investigative Privilege
P-014038 thru P-014041	8/2/2007 emails between Matt Menchel, Jeff Sloman, Andy Lourie, and Marie Villafaña regarding letter received from Lilly Ann Sanchez	Work Product Deliberative Process
P-014042	8/3/2007 Email from Marie Villafaña to Matt Menchel, Andrew Lourie, Jeff Sloman, and Karen Atkinson regarding draft response to correspondence from Epstein counsel and planned investigative steps if agreement cannot be reached.	Work Product Deliberative Process Investigative Privilege
P-014043 thru P-014044	Emails dated 8/6/2007 from Marie Villafaña to Cyndee Campos/Frederica Devlin and Jeff Sloman regarding Matt Menchel's correspondence prior to his departure.	Work Product Deliberative Process
P-014045 thru P-014046	8/7/2007 email chain between Marie Villafaña, Cyndee Campos, and Alex Acosta regarding meeting to discuss Epstein matter	Work Product Deliberative Process Investigative Privilege

Bates Range	Description	Privilege(s) Asserted
P-014047	8/7/2007 email from Marie Villafaña to Andy Lourie regarding deadline set for Epstein plea and Epstein's plan to demand a meeting with CEOS.	Work Product Deliberative Process Investigative Privilege
P-014048	8/7/2007 email from Marie Villafaña to Andrew Oosterbaan regarding Epstein meeting	Work Product Deliberative Process Investigative Privilege
P-014049 thru P-014050	8/7/2007 email chain from Jeff Sloman to Andrew Oosterbaan, Marie Villafaña, and Alex Acosta regarding Epstein meeting	Work Product Deliberative Process Investigative Privilege
P-014051	8/8/2007 emails between Marie Villafaña and Andrew Oosterbaan (CEOS) regarding case staffing and plea negotiations	Work Product Deliberative Process Investigative Privilege
P-014052	8/8/2007 email chain between Andrew Oosterbaan, Alex Acosta, Marie Villafaña, Cyndee Campos, Jeff Sloman, and Andrew Lourie regarding "The meeting on Epstein"	Work Product Deliberative Process Investigative Privilege
P-014053	8/8/2007 email from Marie Villafaña to Drew Oosterbaan regarding plea negotiations, guideline calculations, and assistance in preparing case for trial	Work Product Investigative Privilege Deliberative Process
P-014054	8/8/2007 email from Marie Villafaña to Alex Acosta, Cyndee Campos, Jeff Sloman, Andrew Lourie, and Drew Oosterbaan regarding planning meeting with Epstein counsel and service of target letters	Work Product 6(e) Investigative Privilege Deliberative Process
P-014055	8/10/2007 Electronic correspondence from Marie Villafaña to expert witness regarding topics for expert testimony	Work Product
P-014056	8/10/2007 email from Marie Villafaña to Andrew Lourie regarding target letters and staying motion to compel production of computers	Work Product
P-014057	8/30/2007 email from Marie Villafaña to Jeff Sloman, Andrew Lourie, Drew Oosterbaan, John McMillan, and Karen Atkinson regarding press coverage of meeting with Ken Starr	Work Product
P-014058	9/4/2007-9/6/2007 emails between Marie Villafaña and Jeff Sloman regarding planned participation of FBI ASAIC at 9/7/2007 meeting with Epstein defense team	Work Product Deliberative Process

Bates Range	Description	Privilege(s) Asserted
P-014059 thru P-014061	9/6/2007 emails between Marie Villafaña, Jeff Sloman, Andrew Lourie Drew Oosterbaan, and Rolando Garcia regarding status of plea negotiations, draft agreements, and need to confer with victims	Work Product Deliberative Process
P-014062 thru P-014068	9/10/2007-9/14/2007 emails between Marie Villafaña, Andrew Lourie, Jeff Sloman, Karen Atkinson, Rolando Garcia, Shawn Ball, and Alex Acosta regarding final plea negotiations, finalizing details with State Attorney's Office and final revisions to indictment package	Work Product Deliberative Process 6(e) Investigative Privilege
P-014069	9/10/2007 email from Marie Villafaña to Jeff Sloman and John McMillan regarding Acosta inquiry about FBI investigation into State grand jury proceeding	Work Product 6(e) Investigative Privilege
P-014070 thru P-014074	9/11/2007 emails between Marie Villafaña, John McMillan, Drew Oosterbaan, Nesbitt Kuyrkendall, and Jason Richards regarding changes to the draft indictment and status of plea negotiations	Work Product Deliberative Process Investigative Privilege Attorney-Client Privilege
P-014075 thru P-014089	9/10/2007-9/11/2007 emails between Marie Villafaña, Alex Acosta, and Jeff Sloman regarding modifications to the proposed Non-Prosecution Agreement	Work Product Deliberative Process
P-014090 thru P-014102	9/13/2007 emails from Marie Villafaña to Andrew Lourie, Alex Acosta, Jeff Sloman, Rolando Garcia, and Karen Atkinson regarding plea to federal charges recommending 18 USC 403 or 1512(d), or 47 USC 223(a)(1)(B); response that Epstein was only willing to plead to assault on the plane; and rejection of facts supporting assault on the plane charge	Work Product Deliberative Process
P-014103 thru P-014107	9/13/2007-9/14/2007 emails regarding Marie Villafaña research regarding victim trust fund set up in Alaska child exploitation case	Work Product
P-014108 thru P-014134	9/17/2007-9/19/2007 emails between Marie Villafaña, Rolando Garcia, Andrew Lourie, Alex Acosta, Karen Atkinson, and John McMillan regarding negotiations of a federal plea and a non-prosecution agreement	Work Product Deliberative Process

Bates Range	Description	Privilege(s) Asserted
P-014135 thru P-014149	9/19/2007-9/20/2007 emails between Marie Villafaña, Andrew Lourie, and Rolando Garcia regarding plea negotiations with counsel for Epstein	Work Product Deliberative Process
P-014150 thru P-014156	9/20/2007 emails between Marie Villafaña and Andrew Lourie regarding plea agreement to federal charges and factual proffer	Work Product Deliberative Process
P-014157 thru P-014160	9/21/2007 emails between Marie Villafaña and Andrew Lourie, Rolando Garcia, Karen Atkinson, and John McMillan regarding revisions to the non-prosecution agreement	Work Product Deliberative Process
P-014161	9/21/2007 email from Marie Villafaña to Alex Acosta, Rolando Garcia, Karen Atkinson, and Andrew Lourie regarding review of Epstein indictment package	Work Product Deliberative Process
P-014162 thru P-014170	9/24/2007 series of emails between Marie Villafaña, Alex Acosta, and Andrew Lourie regarding plea negotiations and revisions to non-prosecution agreement	Work Product Deliberative Process
P-014171 thru P-014174	9/23/2007-9/24/2007 series of emails between Alex Acosta, Marie Villafaña, Andrew Lourie, Rolando Garcia, and Jeff Sloman regarding proposed revisions to non-prosecution agreement	Work Product Deliberative Process
P-014175 thru P-014203	9/20/2007-9/24/2007 emails between Alex Acosta, Marie Villafaña, and Andrew Lourie regarding revisions to the non-prosecution agreement	Work Product Deliberative Process
P-014204 thru P-014205	9/24/2007 emails between Marie Villafaña and Rolando Garcia regarding notifying Palm Beach Police Chief and victims about agreement	Work Product Deliberative Process
P-014206 thru P-014216	9/24/2007-9/25/2007 emails between Alex Acosta, Marie Villafaña, Andrew Lourie, and Rolando Garcia regarding Lefkowitz email about keeping agreement from becoming public and confidentiality provision in agreement	Work Product Deliberative Process
P-014217 thru P-014238	10/5/2007-10/16/2007 emails between Marie Villafaña, Jeff Sloman, and Alex Acosta re selection of Special Master and negotiation of revision/addendum to Non-Prosecution Agreement	Work Product Deliberative Process

Bates Range	Description	Privilege(s) Asserted
P-014239 thru P-014242	10/18/2007 emails between Marie Villafaña and Jeff Sloman regarding Epstein's request to delay his change of plea	Work Product Deliberative Process
P-014243 thru P-014251	10/19/2007 emails between Jeff Sloman and Marie Villafaña regarding Special Master's Selection of Attorney Representative	Work Product Deliberative Process
P-014252 thru P-014275	10/22/2007-10/31/2007 emails between Jeff Sloman, Alex Acosta, and Marie Villafaña regarding negotiation of Addendum to Non-Prosecution Agreement and drafting of correspondence regarding scope of Special Master's duties and selection criteria	Work Product Deliberative Process
P-014276	10/31/2007 email from Nesbitt Kurykendall to Marie Villafaña regarding attempts to interview additional witnesses/victims	Work Product Attorney-Client Privilege Investigative Privilege 6(e) Also contains information subject to privacy rights of victims who are not parties to this litigation
P-014277 thru P-014282	11/2/2007-11/5/2007 emails between Marie Villafaña and Jeff Sloman regarding drafting 11/5/2007 letter from Sloman to Lefkowitz	Work Product Deliberative Process
P-014283 thru P-014284	11/5/2007-11/7/2007 emails from Marie Villafaña to Jeff Sloman inquiring about status of matter and contact by Epstein investigators with victims	Work Product Deliberative Process
P-014285 thru P-014298	11/8/2007-11/14/2007 emails between Marie Villafaña, Jeff Sloman, Karen Atkinson, and Jason Richards regarding response to objections raised by Epstein counsel and efforts to change date for guilty plea	Work Product Deliberative Process Attorney-Client Privilege
P-014299 thru P-014307	11/14/2007-11/19/2007 emails between Marie Villafaña, Jason Richards, Jeff Sloman, Rolando Garcia, Alex Acosta, and Karen Atkinson regarding communications with State Attorney's Office and Sheriff's Office in an attempt to insure that Epstein was ineligible for work release	Work Product Deliberative Process Attorney-Client Privilege

Bates Range	Description	Privilege(s) Asserted
P-014308 thru P-014310	11/19/2007 emails between Marie Villafaña, Jeff Sloman, and Rolando Garcia about efforts by Epstein's counsel to change date for change of plea	Work Product Deliberative Process
P-014311 thru P-014329	11/19/2007-11/28/2007 emails between Marie Villafaña, Nesbitt Kuyrkendall, Jason Richards, and Jeff Sloman regarding drafting victim notification letter of upcoming plea	Work Product Deliberative Process Attorney-Client Privilege 6(e) Also contains information subject to privacy rights of victims who are not parties to this litigation
P-014330 thru P-014337	11/28/2007 correspondence between Marie Villafaña, Andrew Lourie, Drew Oosterbaan, and Rolando Garcia regarding Lefkowitz 11/27/2007 email discussing presentation to DAAG	Work Product Deliberative Process
P-014338 thru P-014354	11/29/2007-12/1/2007 emails between Marie Villafaña, Alex Acosta, Jeff Sloman, Cyndee Campos, and Andrew Lourie regarding draft response to Jay Lefkowitz and victim notification letters	Work Product Deliberative Process
P-014355 thru P-014361	12/3/2007 emails between Marie Villafaña, Alex Acosta, and Jeff Sloman regarding history of plea negotiations and drafting response to correspondence from Jay Lefkowitz and Ken Starr	Work Product Deliberative Process
P-014362 thru P-014402	12/3/2007-12/5/2007 correspondence between Alex Acosta, Jeff Sloman, Marie Villafaña, Nesbitt Kuyrkendall, Cyndee Campos, and Annette Castillo about drafting and sending the 12/4/2007 Acosta letter to Ken Starr	Work Product Deliberative Process 6(e) Attorney-Client Privilege
P-014403 thru P-014414	12/6/2007 emails between Marie Villafaña, Andrew Lourie, Cyndee Campos, Jeff Sloman, Alex Acosta, Karen Atkinson, and Nesbitt Kuyrkendall regarding correspondence from Ken Starr, request for a meeting from Epstein counsel, and need to notify victims of upcoming plea	Work Product Deliberative Process
P-014415 thru P-014420	12/6/2007-12/7/2007 emails between Marie Villafaña, Cyndee Campos, Karen Atkinson, Jeff Sloman, and Alex Acosta regarding draft victim notification letter	Work Product Deliberative Process

Bates Range	Description	Privilege(s) Asserted
P-014421 thru P-014428	12/6/2007-12/7/2007 emails between Marie Villafaña, Nesbitt Kuyrkendall, Jason Richards, Jeff Sloman, Cyndee Campos, Annette Castillo, Karen Atkinson, and Shawn Ball regarding request from State Attorney's Office for draft plea proffer	Work Product Deliberative Process 6(e) Attorney-Client Privilege Investigative Privilege
P-014429 thru P-014439	12/9/2007-12/12/2007 emails between Marie Villafaña, Jeff Sloman, Jason Richards, Nesbitt Kuyrkendall, Annette Castillo, Karen Atkinson, and Rolando Garcia regarding drafting response to personal attacks and upcoming meeting with Ken Starr	Work Product Deliberative Process
P-014440	12/11/2007 email from Marie Villafaña to Jeff Sloman and Alex Acosta regarding call with lawyer for Jane Doe #2 (T.M.)	Work Product Deliberative Process
P-014441	12/12/2007 emails between Marie Villafaña, Frederica Devlin, and Bob Senior regarding planning indictment review	Work Product Deliberative Process 6(e)
P-014442	12/14/2007 email from Marie Villafaña to Jeff Sloman, Alex Acosta, and Janice LeClainche regarding state cases mentioned by Epstein's counsel	Work Product Deliberative Process
P-014443	12/14/2007 email from Marie Villafaña to Alex Acosta, Jeff Sloman, Rolando Garcia, and Karen Atkinson with draft letters to State Attorney's Office and victims	Work Product Deliberative Process
P-014444	12/17/2007 email from Marie Villafaña to Jeff Sloman inquiring about case status and informing Sloman regarding agent concern about victim notifications	Work Product Deliberative Process
P-014445 thru P-014447	12/19/2007 email from Marie Villafaña to Alex Acosta and Jeff Sloman summarizing research into other cases where individuals were charged with violating 2422(b) based upon the use of a telephone	Work Product Deliberative Process 6(e)
P-014448 thru P-014454	12/19/2007 emails between Marie Villafaña, Alex Acosta, and Jeff Sloman regarding drafting response to concerns raised during December 14, 2007 meeting between Epstein counsel, Alex Acosta, Jeff Sloman, the FBI SAIC, and Marie Villafaña	Work Product Deliberative Process

Bates Range	Description	Privilege(s) Asserted
P-014455 thru P-014456	12/19/2007 email from Marie Villafaña to Alex Acosta, Jeff Sloman, and Janice LeClainche regarding challenge to state charge raised by Epstein counsel during 12/14/2007 meeting	Work Product Deliberative Process 6(e) Also contains information subject to privacy rights of victims who are not parties to this litigation
P-014457 thru P-014464	12/20/2007 emails between Marie Villafaña and Jeff Sloman regarding inquiries from State Attorney's Office regarding Epstein plea to state charge and facts supporting state plea	Work Product Deliberative Process 6(e) Also contains information subject to privacy rights of victims who are not parties to this litigation
P-014465 thru P-014485	12/18/2007-12/21/2007 emails between Marie Villafaña and other AUSAs regarding other instances of charging 2422(b) based on the use of a telephone as a "facility of interstate commerce"	Work Product 6(e)
P-014486	12/21/2007 email from Marie Villafaña to Jeff Sloman with thoughts on recent correspondence from Jay Lefkowitz raising concerns about interpretation of the Nonprosecution Agreement	Work Product Deliberative Process
P-014487	12/27/2007 email from Marie Villafaña to Alex Acosta and Jeff Sloman regarding proposed approach to providing potential notice of breach of non-prosecution agreement	Work Product Deliberative Process
P-014488 thru P-014499	12/27/2007 emails between Jeff Sloman, Alex Acosta, Annette Castillo, Karen Atkinson, Rolando Garcia, and Marie Villafaña regarding Jay Lefkowitz letter of 12/26/2007	Work Product Deliberative Process
P-014500	1/2/2008 email from Jeff Sloman to Alex Acosta and Marie Villafaña regarding telephone conversation with State Attorney's Office about delay in Epstein state plea.	Work Product Deliberative Process
P-014501 thru P-014506	1/2/2008 emails between Alex Acosta, Marie Villafaña, and Jeff Sloman regarding requests from Alex Acosta to Marie Villafaña for information related to the handling of the investigation by the State Attorney's Office	Work Product Deliberative Process

Bates Range	Description	Privilege(s) Asserted
P-014507 thru P-014508	1/2/2008 emails from Marie Villafaña to Alex Acosta and Jeff Sloman regarding renewed plea negotiations for federal plea agreement	Work Product Deliberative Process 6(e)
P-014509 thru P-014519	1/3/2008 emails between Marie Villafaña, Alex Acosta, and Jeff Sloman regarding Alex Acosta telephone conference with Jay Lefkowitz where Lefkowitz admitted that he never intended to have Epstein plead guilty to an offense that required sex offender registration.	Work Product Deliberative Process
P-014520	1/3/2008 email from Marie Villafaña to Nesbitt Kuyrkendall and Jason Richards regarding renewed plea negotiations and press coverage of Epstein matter.	Attorney client privilege Deliberative Process Investigative Privilege
P-014521 thru P-014522	1/7/2008 email from Marie Villafaña to Alex Acosta, Jeff Sloman, Robert Senior, Karen Atkinson, and Rolando Garcia regarding proposed additional investigative steps in Epstein case.	Work Product Deliberative Process 6(e) Privacy Act
P-014523	1/9/2008 email from Jeff Sloman to Drew Oosterbaan, Alex Acosta, and Marie Villafaña regarding informing Jay Lefkowitz that a CEOS attorney would join the SDFL team regarding the Epstein case and would review the prosecution and defense materials.	Work Product Deliberative Process
P-014524 thru P-014550	1/9/2008-1/14/2008 emails between Marie Villafaña, Drew Oosterbaan, Myesha Braden, Nesbitt Kuyrkendall, and Jason Richards regarding assigning a CEOS attorney to the investigation, meeting with the CEOS attorney and victims in Florida, the results of the meetings and planned additional meetings, and revisions to the indictment in light of the meetings.	Work Product Deliberative Process Attorney-client privilege Investigative Privilege 6(e)
P-014551	1/17/2008 email from Nesbitt Kuyrkendall to Marie Villafaña regarding updated summary charts for indictment preparation, meetings with victims, and victim notification letters from FBI	Attorney-client privilege Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation 6(e)
P-014552	1/23/2008 email from Marie Villafaña to Jeff Sloman and Alex Acosta regarding FBI involvement in meeting in DC	Work Product Deliberative Process

Bates Range	Description	Privilege(s) Asserted
P-014553 thru P-014556	1/25/2008 emails between Marie Villafaña and Myesha Braden regarding press coverage of case and strategic decisions regarding revisions to initial indictment	Work Product 6(e) Deliberative Process Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
P-014557	1/25/2008 email from Nesbitt Kuyrkendall to Marie Villafaña and Shawn Ball regarding research for purposes of issuing grand jury subpoenas.	6(e) Attorney-client privilege Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
P-014558	1/29/2008 email from Marie Villafaña to Drew Oosterbaan and Myesha Braden regarding status of meeting in DC and concerns regarding delay.	Work Product Deliberative Process 6(e) Investigative Privilege
P-014559 thru P-014562	1/28/2008-1/29/2008 emails between Marie Villafaña and Myesha Braden regarding scheduling victim interviews on 1/31/2008-2/1/2008	Work Product 6(e) Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
P-014563 thru P-014565	1/30/2008 emails between Marie Villafaña, Alex Acosta, and Jeff Sloman regarding Lefkowitz email about lawsuit filed against Epstein by one of the victims identified during the state investigation.	Work Product Deliberative Process 6(e) Also contains information subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
P-014566 thru P-014568	1/31/2008 emails between Marie Villafaña and Nesbitt Kuyrkendall regarding interviews with victims.	Work Product Investigative Privilege Attorney-client privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
P-014569 thru P-014573	1/31/2008-2/1/2008 emails between Marie Villafaña, Jeff Sloman, Alex Acosta, Nesbitt Kuyrkendall, Jason Richards, and Alan Santiago regarding results of additional victim-witness interviews and requesting intervention with CEOS to move review process along	Work Product Deliberative Process 6(e) Attorney-Client Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation Investigative Privilege
P-014574 thru P-014583	2/20/2008-2/21/2008 emails between Drew Oosterbaan, Marie Villafaña, Robert Senior, Jeff Sloman, Sigal Mandelker, Karen Atkinson, Alex Acosta, Rolando Garcia and Myesha Braden regarding status of CEOS plans to meet with counsel for Epstein and status of indictment review	Work Product Deliberative Process 6(e)
P-014584 thru P-014622	2/12/2008-2/22/2008 emails between Marie Villafaña, Nesbitt Kuyrkendall, Jason Richards, and Myesha Braden analyzing facts gathered from grand jury investigation and discussing strategy for drafting revised indictment	Work Product Attorney-Client Privilege Investigative Privilege 6(e) Also contains information subject to privacy rights of victims who are not parties to this litigation
P-014623 thru P-014627	2/25/2008 emails between Marie Villafaña and Caroline Heck Miller regarding ethical issue about whether or not to present proposed revised indictment to new grand jury	Work Product Deliberative Process 6(e)
P-014628	2/25/2008 email from Marie Villafaña to Jeff Sloman, Robert Senior, Rolando Garcia, Karen Atkinson, and Myesha Braden regarding result of consultation with Caroline Heck Miller about grand jury question	Work Product Deliberative Process 6(e)

Bates Range	Description	Privilege(s) Asserted
P-014629	2/26/2008 email from Marie Villafaña to Myesha Braden regarding CEOS review and draft indictment package	Work Product Deliberative Process
P-014630 thru P-014631	2/26/2008 email from Marie Villafaña to Jeff Sloman regarding Jeff Sloman's 2/25/2008 correspondence to Jay Lefkowitz further extending the plea deadline for Epstein	Work Product Deliberative Process Investigative Privilege 6(e)
P-014632 thru P-014646	2/21/2008-2/27/2008 emails between Marie Villafaña, David Weinstein, Robert Senior, Karen Atkinson, and Rolando Garcia regarding notifying DOJ's Civil Rights Division regarding the status of the case and the planned indictment, and the draft written notification	Work Product Deliberative Process 6(e) Investigative Privilege
P-014647 thru P-014649	2/28/2008 emails between Marie Villafaña and Susan Roe regarding related investigation, potential investigatory leads, and CEOS review	Work Product Investigative Privilege 6(e)
P-014650 thru P-014653	2/27/2008-2/28/2008 emails between Marie Villafaña, Nesbitt Kuyrkendall, and Jason Richards regarding review of evidence received pursuant to subpoenas and planned interviews of additional potential victim-witnesses	Work Product Investigative Privilege Attorney-client privilege 6(e) Also contains information subject to privacy rights of victims who are not parties to this litigation
P-014654 thru P-014655	2/29/2008 emails between Jeff Sloman, Marie Villafaña, Robert Senior, and David Weinstein regarding continuing investigation and status of CEOS review	Work Product Deliberative Process Investigative Privilege 6(e)
P-014656 thru P-014665	3/4/2008-3/5/2008 emails between Nesbitt Kuyrkendall and Marie Villafaña regarding search warrant and victim contact with attorneys	Work Product Attorney-client privilege 6(e) Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
P-014666 thru P-014693	3/5/2008-3/6/2008 emails between Marie Villafaña, Alex Acosta, Jeff Sloman, Drew Oosterbaan, Robert Senior, Myesha Braden, Rolando Garcia, and Karen Atkinson regarding meeting in DC, additional information to prepare for meeting, and new information from ongoing investigation	Work Product Deliberative Process 6(e) Investigative Privilege
P-014694 thru P-014706	3/10/2008-3/12/2008 emails between Marie Villafaña, Robert Senior, Myesha Braden, Krishna Patel, Nesbitt Kuyrkendall, E.J. Yera, and Karen Atkinson about Epstein attempts to contact victims and finding counsel for victims	Work Product Deliberative Process Attorney-client privilege
P-014707 thru P-014711	3/12/2008 emails between Marie Villafaña, Drew Oosterbaan, and Myesha Braden regarding CEOS meeting with Epstein counsel	Work Product
P-014712 thru P-014716	3/14/2008 emails between Marie Villafaña, Rolando Garcia, Karen Atkinson, Frederica Devlin, and Shawn Ball regarding complete indictment package for Robert Senior final review	Work Product Deliberative Process 6(e)
P-014717 thru P-014721	3/12/2008-3/17/2008 emails between Marie Villafaña, Nesbitt Kuyrkendall and E.J. Yera regarding search warrant application and execution of search warrant	Work Product Attorney client privilege Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
P-014722 thru P-014727	3/14/2008-3/17/2008 emails between Marie Villafaña, Nesbitt Kuyrkendall, Jason Richards, and Robert Senior regarding corrections to indictment package and proposed grand jury presentation	Work Product Deliberative Process 6(e) Attorney-Client Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
P-014728 thru P-014742	3/14/2008-3/19/2008 emails between Marie Villafaña, Nesibtt Kuyrkendall, Jason Richards, Robert Senior, Jeff Sloman, Karen Atkinson, and Rolando Garcia about Epstein attempts to contact victims and finding counsel for victims	Work Product Deliberative Process Attorney-client privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
P-014743 thru P-014780	3/19/2008-3/21/2008 emails between Marie Villafaña, Drew Oosterbaan (CEOS), Alexandra Gelber (CEOS), Jeff Sloman, and Robert Senior about meeting between Epstein counsel and CEOS and follow-up questions	Work Product 6(e) Deliberative Process Investigative Privilege
P-014781 thru P-014800	3/19/2008-3/27/2008 emails between Jeff Sloman, Bob Senior, Karen Atkinson, Rolando Garcia, Nesbitt Kurykendall, and Jason Richards regarding waiting for DC's decision regarding Epstein's challenges to NPA; status of ongoing investigation; problems with Epstein's counsel contacting victims in the guise of deposing them for the state criminal action; and securing pro bono counsel for those victims to represent them in connection with the depositions	Work Product Deliberative Process Investigative Privilege 6(e)
P-014801 thru P-014810	3/28/2008 emails between Marie Villafaña, Nesbitt Kuyrkendall, Jeff Sloman, Robert Senior, and Karen Atkinson regarding status of DC review of case and preparing for grand jury presentation	Work Product 6(e) Investigative Privilege Deliberative Process
P-014811 thru P-014829	3/31/2008 emails between Marie Villafaña, Jeff Sloman, Robert Senior, and Nesbitt Kuyrkendall regarding status of ongoing investigation, planned presentation to grand jury, continued delay in awaiting decision from Washington, DC, and problems with victims being harassed	6(e) Work Product Deliberative Process Investigative Privilege
P-014830 thru P-014837	4/2/2008 emails between Marie Villafaña, Alex Acosta, Jeff Sloman, Karen Atkinson, Robert Senior, Rolando Garcia, and Nesbitt Kuyrkendall regarding efforts by Jay Lefkowitz and Ken Starr to speak with Alex Acosta and instructions to direct question to Marie Villafaña and Karen Atkinson	Deliberative Process Work Product Attorney-Client Privilege

Bates Range	Description	Privilege(s) Asserted
P-014838 thru P-014843	4/4/2008-4/7/2008 emails between Marie Villafaña, Robert Senior, Andrew Oosterbaan, and Jeff Sloman regarding status of CEOS review of Epstein matter	Work Product 6(e) Deliberative Process
P-014844 thru P-014851	4/10/2008-4/18/2008 emails between Marie Villafaña, Robert Senior, Karen Atkinson, Nesbitt Kuyrkendall, and Jeff Sloman about continued delay in presenting case to grand jury due to failure to receive decision from DC, status of grand jury presentation and ongoing investigation	6(e) Work Product Deliberative Process Investigative Privilege
P-014852 thru P-014864	4/11/2008-4/23/2008 emails between Marie Villafaña, Jeff Sloman, and Dexter Lee regarding self-reporting to OPR false allegations of ethics violations	Work Product Deliberative Process Privacy Act
P-014865	4/29/2008 email from Marie Villafaña to Robert Senior, Jeff Sloman, Karen Atkins, on Rolando Garcia re grand jury presentation	Work Product 6(e) Deliberative Process Investigative Privilege
P-014866 thru P-014883	4/21/2008-5/1/2008 emails between Marie Villafaña, Robert Senior, Jeff Sloman, Karen Atkinson, Nesbitt Kuyrkendall, and Drew Oosterbaan about continued delay in presenting case to grand jury due to failure to receive decision from DC, status of grand jury presentation and ongoing investigation, staffing of case for purposes of trial, and meeting to prepare for grand jury presentation	6(e) Work Product Deliberative Process Investigative Privilege
P-014884 thru P-014886	5/2/2008 emails between Robert Senior, Marie Villafaña, Karen Atkinson, Nesbitt Kuyrkendall, and Jason Richards regarding developments in Epstein investigation and impact on grand jury presentation	6(e) Work Product Attorney-Client Privilege Investigative Privilege Deliberative Process
P-014887 thru P-014894	4/29/2008-5/2/2008 emails between Marie Villafaña and Jeff Sloman regarding contact by Epstein counsel and victims and draft letter to counsel for Epstein	6(e) Work Product Deliberative Process Investigative Privilege

Bates Range	Description	Privilege(s) Asserted
P-014895 thru P-014900	5/7/2008-5/9/2008 emails between Marie Villafaña, Robert Senior, Jeff Sloman, Nesbitt Kuyrkendall, and Jason Richards regarding awaiting approval from DC and status of ongoing investigation	Work Product 6(e) Deliberative Process Attorney-Client Privilege Investigative Privilege
P-014901 thru P-014906	5/15/2008-5/16/2008 emails between Jeff Sloman, Marie Villafaña, and Robert Senior regarding receiving final approval from DC	Work Product Deliberative Process
P-014907 thru P-014911	5/19/2008-5/22/2008 emails between Marie Villafaña, Karen Atkinson, Robert Senior, and Jeff Sloman regarding preparation for grand jury presentation; communication with S/A Kuyrkendall regarding plea negotiations; and status of ongoing investigation	6(e) Work Product Deliberative Process Investigative Privilege
P-014912 thru P-014919	5/23/2008-5/27/2008 emails between Marie Villafaña, Robert Senior, Jeff Sloman, Karen Atkinson, Nesbitt Kuyrkendall (FBI), and Jason Richards (FBI) re status of investigation, indictment review, grand jury preparation, and Epstein's attempt to revisit plea negotiations	Work Product 6(e) Deliberative Process Investigative Privilege
P-014920 thru P-014923	8/15/2008 email from Marie Villafaña to Alex Acosta, Jeff Sloman, Robert Senior, Karen Atkinson, and Dexter Lee containing draft response to 8/15/2008 email from Jay Lefkowitz regarding implementation of the NPA. (Redacted version produced to opposing counsel)	Work Product Deliberative Process