

1. **PERSONAL INFORMATION ABOUT THE VICTIM**

First Name:	Middle Name:				Last Name: Jane Does 1& 2 (pseudonym)	
Title:	Mr. ___	Mrs. ___	Ms. ___	Miss ___	Other ___	
Street Address:						
City:		State:		Country:		Zip Code:
Home Telephone No:			Work Telephone No:		Cell Phone No:	
Email Address:						

2. **INFORMATION ABOUT THE CRIMINAL CASE**

The following section requests important information about the criminal investigation or case in which you are a victim. Please provide as much information as you can.

Stage of the Criminal Justice Process - Select most recent event:							
<input checked="" type="checkbox"/> Investigation	<input type="checkbox"/> Arrest	<input type="checkbox"/> Arraignment	<input type="checkbox"/> Preliminary Hearing	<input type="checkbox"/> Guilty Plea	<input type="checkbox"/> Trial	<input type="checkbox"/> Sentencing	<input type="checkbox"/> Parole Hearing
<input type="checkbox"/> Other _____							
Defendant(s) Name(s): Subject/Target Bruce Reinhart							
Case Number:			District Court:			Judge:	

3. **INFORMATION ABOUT THE VICTIM'S COMPLAINT**

What is the location and name of the office(s) or organization(s) of the Department of Justice that is/are the subject of your complaint?

U.S. Attorney's Office for the District of Puerto Rico, Torre Chardón, Suite 1201
350 Carlos Chardón Street, San Juan, PR 00918 [REDACTED]

Is your complaint against a specific person in that office? Yes No

If yes, please identify the person(s) (include position or title, if known) who failed to provide the right(s) about which you are complaining.

U.S. Attorney Rodriguez-Velez and other attorneys

Which of the following rights afforded by the Crime Victims' Rights Act of 2004, 18 U.S.C. § 3771, do you feel you were denied? Please check all that apply.

- The right to be reasonably protected from the accused.
- The right to reasonable, accurate, and timely notice of any public court proceeding, or any parole proceeding, involving the crime or of any release or escape of the accused.
- The right not to be excluded from any such public court proceeding, unless the court, after receiving clear and convincing evidence, determines that testimony by the victim would be materially altered if the victim heard other testimony at that proceeding.
- The right to be reasonably heard at any public proceeding in the district court involving release, plea, sentencing, or any parole proceeding.
- X The reasonable right to confer with the attorney for the Government in the case.
- The right to full and timely restitution as provided by law.
- The right to proceedings free from unreasonable delay.
- X The right to be treated with fairness and with respect for the victim's dignity and privacy.
- The right to be informed in a timely manner of any plea bargain or deferred prosecution agreement.
- X The right to be informed of the rights under this section and the services described in section 503(c) of the Victims' Rights and Restitution Act of 1990 (42 U.S.C. 10607(c)) and provided contact information for the Office of the Victims' Rights Ombudsman of the Department of Justice.

4. **STATEMENT OF COMPLAINANT**

Please provide as much detailed information about your complaint against the Department of Justice employee(s) as possible, including the date(s) of the alleged violation(s), and an explanation of how the violation(s) occurred. However, you should not discuss the facts of the criminal investigation or case in which you are a victim. You may attach additional pages or documents to this complaint.

This case involves a request for an investigation of a former Assistant U.S. Attorney who filed a false statement in a Crime Victims Rights Act (CVRA) case in the Southern District of Florida. The recognized victims in that CVRA case – Jane Doe 1 and Jane Doe 2 – through undersigned legal counsel (██████████) requested a criminal investigation. See Exhibit 1. Through the Executive Office for U.S. Attorney's, the investigation was assigned to the U.S. Attorney's Office for the District of Puerto Rico (USAOPR). The case bounced around there from AUSA to AUSA. Finally, it came to rest on the desk of AUSA ██████████, and we had good discussions with him about the issues in October. He indicated he would stay in touch. When we didn't hear back from him for several months, we called the USAOPR. It took weeks of phone calls, but we finally were able to reach ██████████ in the Office. She said that AUSA had left the Office and that the matter was now on the desk of the First Assistant and was pending reassignment. She also said we should call ██████████ for further information. See Exhibit 2.

We then called ██████████ on December 28, 2015, January 5, 2016, January 14, 2016, and January 19, 2016. None of those telephone calls were returned. Accordingly, on January 19, 2016, we faxed and mailed a letter to the U.S. Attorney expressing concern about the lack of a response. Having received no response to the letter, on February 2, 2016, we called the U.S. Attorney and left a message for her. Again, that call was not returned.

6. **OTHER RELEVANT INFORMATION**

Provide any other relevant information or event(s). You may attach additional pages or documents to this complaint.

The information set forth herein is true and correct to the best of my knowledge.

Signature: _____

Date: _____

(Must be signed by Victim)

If the crime victim is under 18 years of age, incompetent, incapacitated, or deceased, this form must be signed by the Legal Guardian of the crime victim or the representative of the crime victim's estate, family member, or any other person appointed by the court. Please check all that apply to the victim:

Under 18 years of age

Incapacitated

Incompetent

Deceased

Signature: /s/ Paul G. Cassell

Date: 2/17/16

Rev. 1/2016

EXHIBIT 1

March 3, 2014

Wifredo A. Ferrer
United States Attorney
Southern District of Florida
99 N.E.4th Street
Miami, FL 33132

Re: Request for Investigation of Bruce E. Reinhart

Dear Mr. Ferrer:

As you recall, I represent Jane Doe No. 1 and Jane Doe No. 2 (“the victims”) in their efforts to protect their rights under the Crime Victims’ Rights Act (CVRA). You were nice enough to meet with Jane Doe No. 1 in December 2010 about her efforts. At the conclusion of that meeting, I presented you with a letter presenting grave concerns about possible improper influences being brought to bear on your Office during its negotiation of the Jeffrey Epstein non-prosecution agreement. I was suspicious that your Office had agreed not to prosecute Epstein for hundreds of federal crimes involving the sexual abuse of children for inappropriate reasons. I asked for a full investigation of those allegations. As I understand how things were ultimately resolved, the Justice Department concluded that it would not investigate whether improper influences were brought to bear, for reasons that are not entirely clear to me.

I am writing now to renew that request for an investigation and provide new information suggesting that improper influences were brought to bear on the non-prosecution decision. In particular, it is now clear that former Assistant U.S. Attorney Bruce E. Reinhart has filed a false affidavit in the victims’ CVRA case. I am writing to ask that your Office, or the appropriate component within the Justice Department, investigate whether he has committed a crime in filing this false affidavit. If so the victims ask that you initiate a criminal prosecution of this crime. The victims also ask that you refer Mr. Reinhart to any appropriate disciplinary committee.

By way of background, on March 21, 2011, the victims filed a Motion for Finding of Violations of the Crime Victims’ Rights Act and Request for Hearing on the Appropriate Remedies. Jane Doe No. 1 et al. v. United States, Doc. 48. Among the allegation that the victims made were:

52. One of the senior prosecutors in the U.S. Attorney’s Office joined Epstein’s payroll shortly after important decisions were made limiting Epstein’s criminal liability – and improperly represented people close to Epstein. During the federal investigation of Epstein, Bruce Reinhart was a senior Assistant U.S. Attorney in the U.S. Attorney’s Office for the Southern District of Florida. Within months after the non-prosecution agreement was signed, Reinhart left the Office and immediately went into practice as a “white collar” criminal defense attorney. His office coincidentally happened to be not only in the same building

(and on the same floor) as Epstein's lead criminal defense counsel, Jack Goldberger, but it was actually located right next door to the Florida Science Foundation – an Epstein-owned and –run company where Epstein spent his “work release.” . . .

53. While working in this Office adjacent to Epstein's, Reinhart undertook the representation of numerous Epstein employees and pilots during the civil cases filed against Epstein by the victims – cases that involved the exact same crimes and same evidence being reviewed by the U.S. Attorney's office when he was employed there. Specifically, he represented [REDACTED] (Epstein's number one co-conspirator who was actually named as such in the NPA), his housekeeper (Louella Ruboyo), his pilots Larry Morrison, Larry Visoski, David Rogers, William Hammond and Robert Roxburgh. (Hammond and Roxburgh were not deposed, but the others were.) *See* depositions of these individuals in various Epstein civil cases. On information and belief, Reinhart's representation of these individuals was paid, directly or indirectly, by Epstein. Such representations are in contravention of Justice Department regulations and Florida bar rules. Such representations also give, at least, the improper appearance that Reinhart may have attempted to curry with Epstein and then reap his reward through favorable employment.

Victims' Motion for Finding of Violations of the Crime Victims' Rights Act and Request for Hearing on the Appropriate Remedies, DE 48 at 22-23.

In response to these allegations, your Office essentially chose to remain silent. *See, e.g.*, DE 58 at 10-13 (contesting some of the facts alleged by the victims, but not commenting on the Bruce Reinhart allegations). Reinhart, however, did not remain silent. Instead, he filed a Motion to Intervene or in the Alternative for a Rule 11 Order, DE 79. He argued that the victims' facts were not accurate and attached an affidavit, made under authority of 28 U.S.C. § 1746. In that affidavit, Reinhart stated: “I never learned any confidential, non-public information about the Epstein matter.” DE 79-1 at 3. The affidavit concluded with the statement: “I declare under penalty of perjury that the foregoing is true and correct.”

Your Office chose to remain silent when that information was presented to the court during a hearing on the matter. The victims did not believe that Reinhart's affidavit was true and correct, however, and victims' counsel requested an opportunity to discuss the contents with him. Reinhart, however, refused to meet with counsel. Accordingly, the victims were forced to seek information from your Office about the matter. As authorized by Judge Marra, they propounded requests for admission to your Office about Reinhart's knowledge of information about the Epstein case. After your efforts to prevent answering those questions were rebuffed by Judge Marra, on July 19, 2013, your Office admitted that it had information that Reinhart's statements (made under penalty of perjury) were not accurate:

- (a) The government admits that, while Bruce E. Reinhart was an Assistant U.S. Attorney, he learned confidential, non-public information about the Epstein matter.
- (b) The government admits that, while Bruce E. Reinhart was an Assistant U.S. Attorney, he discussed the Epstein matter with another Assistant U.S. Attorney working on the Epstein matter.

DE 213-1 at 9. I recently requested that your Office provide further information about Reinhart's false statements, but it has so far not done so.

In light of all this, the victims request that you begin a criminal investigation about whether Reinhart has committed a crime by filing false information in an effort to prevent them for vindicating their rights under the CVRA. *See* 18 U.S.C. § 1621 (providing for felony for submitting false information in a declaration made under § 1746). If so, the victims would request criminal prosecution of that offense. The victims also request that if your Office possesses any information demonstrating that Reinhart has violated the legal rules of ethics, that they provide that information to the appropriate disciplinary authorities. *See* Florida Rule Prof. Conduct, Rule 4-8.3 ("A lawyer who knows that another lawyer has committed a violation of the Rules of Professional Conduct that raises a substantial question as to that lawyer's honesty, trustworthiness, or fitness as a lawyer in other respects shall inform the appropriate professional authority."). Jane Doe No. 1 and Jane Doe No. 2 would also like to confer with your Office about these matters throughout the course of your investigation, as they would be the "victims" of this effort to provide false information to the Court to impede their case. *See* 18 U.S.C. § 3771(a)(5). And they would more broadly renew their request, made several years ago, that the Department investigate whether improper influences lead the non-prosecution agreement the Epstein case.

The victims would respectfully observe that it is possible that your Office may have a conflict of interest on some of these topics. If so, the victims would respectfully request that the matter be referred to an appropriate, non-conflicted, component of the Justice Department.

Respectfully Submitted,



Paul G. Cassell

for Jane Doe No. 1 and Jane Doe No. 2
S.J. Quinney College of Law at the
University of Utah
332 S. 1400 E.
Salt Lake City, UT 84112
Telephone: [REDACTED]
Facsimile: [REDACTED]
E-Mail: [REDACTED]

The views expressed in this letter are solely those of the author and not necessarily those of the University of Utah.

EXHIBIT 2

PAUL G. CASSELL
Ronald N. Boyce Presidential Professor of Criminal Law
S.J. Quinney College of Law at the University of Utah
383 S. University St.
Salt Lake City, UT 84112
Telephone: [REDACTED]
[REDACTED]

January 20, 2016

U.S. Attorney Rose E. Rodriguez-Velez
United States Attorney's Office
Torre Chardón, Suite 1201
350 Carlos Chardón Street
San Juan, PR 00918
Via Fax: [REDACTED]

Re: [REDACTED] Matter

Dear U.S. Attorney Rodriguez-Velez:

I have been trying to reach the appropriate person in your Office about the above-captioned matter for six weeks. I write on behalf of Jane Doe No. 1 and Jane Doe No. 2, the victims of [REDACTED] false statement, to inquire into the matter and to exercise their right to confer, 18 U.S.C. § 3771(a)(5). My repeated phone calls have not been returned, so I am writing directly to you. Because this is an important matter that has been "conflicted out" to your Office, I hope that you will have someone return my call.

By way of background, during the extended federal criminal investigation in Florida of Jeffrey Epstein for numerous sex offenses, [REDACTED] was a senior Assistant U.S. Attorney in the U.S. Attorney's Office for the Southern District of Florida. Within months after a non-prosecution agreement was signed between the Office and Epstein, [REDACTED] left the Office and immediately went into private practice as a white collar criminal defense attorney. Coincidentally, his office happened to be not only in the same building (and on the same floor) as Epstein's lead criminal defense counsel, Jack Goldberger, but it was actually located right next door to the Florida Science Foundation – an Epstein-owned and -run company where Epstein spent his "work release."

While working in this Office adjacent to Epstein's, Reinhart undertook the representation of numerous Epstein employees and pilots during the civil cases filed against Epstein by the victims – cases that involved the exact same crimes and same evidence being reviewed by the U.S. Attorney's office when he was employed

* This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah.

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there. Specifically, he represented [REDACTED] (Epstein's number one co-conspirator who was actually named as such in the NPA), his housekeeper (Louella Ruboyo), and his pilots Larry Morrison, Larry Visoski, David Rogers, William Hammond and Robert Roxburgh. (Hammond and Roxburgh were not deposed, but the others were.) See depositions of these individuals in various Epstein civil cases. On information and belief, [REDACTED] representation of these individuals was paid, directly or indirectly, by Epstein.

[REDACTED] representations were in contravention of Justice Department regulations and Florida bar rules. Such representations also give, at least, the improper appearance that [REDACTED] may have attempted to curry with Epstein and then reap his reward through favorable employment. But of particular relevance to the matter that has been assigned to your Office, [REDACTED] filed a sworn declaration (in the case of Jane Doe No. 1 and Jane Doe No. 2 vs. United States, 9:08-cv-80736) stating under oath that "I never learned any confidential, non-public information about the Epstein matter." *Id.*, DE 79-1. The U.S. Attorney's Office for the Southern District of Florida has since admitted, in answers to our request for admissions in the Jane Doe matter, that [REDACTED] sworn statement is false. The circumstances surrounding [REDACTED] making his false statement make it apparent that this could not have been an accident. I believe that Dexter Lee and other prosecutors within the U.S. Attorney's Office in the Southern District of Florida can provide you further information showing how [REDACTED] declaration was clearly false.

Jane Doe No. 1 and Jane Doe No. 2 have been harmed by his false statement and are, accordingly, "victims" of his federal crime of perjury. As their attorney (along with co-counsel [REDACTED]), I would like to confer with you about how your Office intends to handle this issue. See 18 U.S.C. 3771(a)(5) (victim's right to confer). I understand that the matter was referred to your Office because of the conflict of interest that the U.S. Attorney's Office for the Southern District of Florida might have investigating perjury by one of its former prosecutors.

Last summer, I tried to reach your Office repeatedly to learn the status of the referral. I had been told by the U.S. Attorney's Office for the Southern District of Florida that AUSA [REDACTED] was handling the matter. I later learned that [REDACTED] had left your Office and the matter had been reassigned to AUSA [REDACTED]. After repeated calls, I ultimately made contact with [REDACTED] who then told me he would contact [REDACTED] to see about the case. After further inquiries, I was told that the matter had been further reassigned to AUSA [REDACTED]. In about October, my co-counsel [REDACTED] and I were able to speak to [REDACTED] about the case, and we were

assured that appropriate investigation was moving forward and that Mr. [REDACTED] would stay in touch.

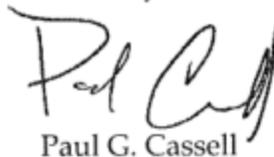
Having not heard back from Mr. [REDACTED] for a while, on December 5, 2015, I sent him an email to inquire about the status of the case. I received a "bounceback" email indicating that he was apparently no longer with your Office. I then made a series of phone calls to [REDACTED], who I was told was handling the reassignment of cases that had previously been handled by AUSA [REDACTED]. After several weeks of telephone calls, I was able to talk to [REDACTED]. She told me that the [REDACTED] matter was on the desk of the First Assistant and was pending reassignment. I was told to call [REDACTED] for further information.

I have left phone messages for Ms. [REDACTED] on December 28, January 5, January 14, and yesterday – none of which have been returned. Accordingly, I am writing to you.

I hope you can see why Mr. [REDACTED] and I may be concerned about whether the [REDACTED] case is being expeditiously handled. It appears that it is about to be reassigned to the fourth AUSA in in the last six months and no one is responding to my repeated calls about conferring on the case. The case presents very important issues about the integrity of the judicial process and the fair treatment of crime victims. I hope that someone in your Office will call me about the case soon.

I can be reached through the contact information above. Thanks in advance for your consideration of this issue. (Note: the views expressed in this letter are my own, and are not an institutional position of the University of Utah.)

Sincerely,



Paul G. Cassell

Cc: [REDACTED]