

August 5, 2015

Asst. U.S. Attorney Vernon Miles  
U.S. Attorney's Office – District of Puerto Rico

Re: Bruce Reinhart Matter

Dear AUSA Miles:

I understand from AUSA [REDACTED] (S.D. of Florida) that the [REDACTED] matter has been transferred to you. I write on behalf of Jane Doe No. 1 and Jane Doe No. 2, the victims of his false statement, to inquire into the matter and see how it is proceeding.

As you may recall, during the extended federal criminal investigation 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, [REDACTED] 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 Vidoski, 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.

Such representations are 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 apparently been assigned to you, [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 admission, that this sworn statement is false. The circumstances surrounding [REDACTED] making the false statement make it apparent that his false statement could not have been an accident. I believe that [REDACTED] 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 false.

Jane Doe No. 1 and Jane Doe No. 2 have been harmed by his false statement 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.

I can be reached at 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]