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and not to imply institutional endorsement)

February 28, 2025

The Honorable Pam Bondi
Attorney General
U.S. Department of Justice
[REDACTED]
Washington, DC 20530
Via email: [REDACTED]

Re: URGENT - Preventing the Release of the Names and Identifying Information of Jeffrey Epstein's Sexual Assault Victims

Dear Attorney General Bondi:

We write on behalf of our clients, multiple sexual assault victims of notorious sex abuser and trafficker, Jeffrey Epstein. We have seen media reports indicating that the Justice Department has (quite properly in our view) released to the public various Epstein files—including media reports showing release of “The Epstein Files: Phase 1.” We write to raise with you a concern that many documents and other materials in the various phases of this important transparency project will undoubtedly contain names and other identifying information of Epstein’s sexual assault victims. We would like to work with you to ensure that those documents are properly redacted to avoid the devastating harm that would be caused if any of Epstein’s victims’ names were to be inadvertently released.

By way of introduction, all three of us specialize in crime victims’ rights, one of us (Cassell) as a law professor working in this field and two of us (Edwards and Henderson) as the founding partners of the Crime Victim Law Firm. Collectively, we have represented over two hundred Epstein victims over the last sixteen years. For example, working together, we were lead counsel in the federal Crime Victims’ Rights Act case, which sought to invalidate Epstein’s secret non-prosecution agreement as well as to obtain the release of information so that the victims would know what happened. *See generally* Paul G. Cassell, Bradley J. Edwards, & Jordan Peck, *Circumventing the Crime Victims’ Rights Act: A Critical Analysis of the Eleventh Circuit’s Decision Upholding Jeffrey Epstein’s Secret Non-Prosecution Agreement*, 2021 MICH. ST. L. REV. 211; BRADLEY J. EDWARDS WITH BRITTANY HENDERSON, *RELENTLESS PURSUIT: MY FIGHT FOR THE VICTIMS OF JEFFREY EPSTEIN* (2020). So we strongly support your goal of getting information out about the Epstein case.

But at the same time, we know that Jeffrey Epstein was sexually abusing young women on a daily basis for years and that, consequently, the names and other identifying information of his hundreds of victims will be scattered throughout various investigative files. Without knowing the details about all the victims and their abuse, certain names and other identifying information could be released inadvertently, which would have devastating consequences.

We know that you have been diligently pressing the FBI to provide to provide you with “the full and complete Epstein files,” including “all records, documents, audio and video recordings, and materials related to Jeffrey Epstein and his clients, regardless of how such information was obtained.” Letter from Attorney General Pam Bondi to FBI Director Kash Patel (Feb. 27, 2025). Consistent with your long-standing attention to crime victims’ needs, we also note that your letter to Director Patel has, quite properly, required that the Justice Department “will ensure that any public disclosure of these files will be done in a manner to protect the privacy of victims and in accordance with law, as I done with my entire career as a prosecutor.” *Id.* Of course, one of the laws that operates in federal cases such as this one is the Crime Victims’ Rights Act, which requires the Justice Department to treat crime victims—such as the Jeffrey Epstein sexual assault victims—with “fairness and with respect for the victim’s dignity and privacy.” 18 U.S.C. § 3771(a)(8).

Against this backdrop, we write to offer our assistance in what will no doubt be an extensive and complex redaction process as the various phases of releasing these documents move forward. In our experience of representing Epstein victims for more than sixteen years, there are likely hundreds of thousands of pages of documents associated with the Epstein investigation. Scattered throughout those pages will be the names (and home addresses, medical information, family members, and other sensitive materials) regarding dozens and dozens of Epstein victims. Ensuring that the redactions of victims’ names and other identifying information are done properly and completely will, no doubt, be a complicated task. Because we have considerable experience with the case—and knowledge of more than 200 hundred victims’ names and other identifying information—we believe our assistance in this process will be vital to avoid inadvertent release of private information.

If the redaction process is done by people without full knowledge of the details of the case, it is likely that victims’ names or identifying information will mistakenly be made public. Such unintended releases could have devastating effects on the victims. As you know from your long work prosecuting and supporting the prosecution of sexual abusers, sexual assault victims look to law enforcement to protect them and their privacy. It is vital that redactions of Epstein’s victims’ names and related information be handled carefully and thoroughly. We offer our assistance to help in the process of releasing the Epstein files, not to hinder it. And because of our expertise and knowledge about the case, we believe that we could help the process move more quickly.

Media reports indicate that the Department will be releasing Epstein information in the very near future. If errors were made in that process, it would allow critics of the Department’s

laudable efforts to focus on those mistakes, rather than on the strong public interest in transparency. If we could work with you, we could help prevent mistakes—and help get information to the public rapidly. Of course, the public does not want to compromise victim privacy. A redaction process done by knowledgeable persons is critical to success here.

We hope that we can discuss this important crime victims' rights issue with you or your representative as soon as possible. Your commitment to protecting crime victims is well known. We can help.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul G. Cassell".

Paul G. Cassell
Bradley J. Edwards
Brittany Henderson
Counsel for many Jeffrey Epstein sexual
assault victims

cc: Edward Martin, Acting U.S. Attorney, District of the District of Columbia
via email at [REDACTED]
Hayden O'Byrne, Acting U.S. Attorney, Southern District of Florida
via email at [REDACTED]