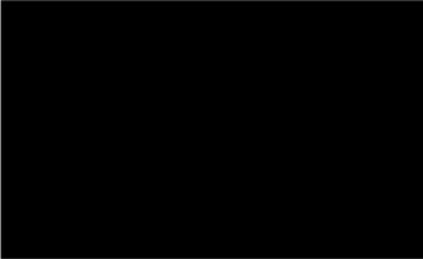




Subject: Well, our victim notification letter has been filed in court

Our victim notification letter has been filed in court in connection with one of the federal civil suits against Epstein.

About 10 letters have gone out so far. The FBI's victim coordinator is updating the addresses on the rest and they will go out on Monday.



00

Tracking:

445

EFTA00179991

Recipient

Sloman, Jeff (USAFLS)
Lee, Dexter (USAFLS)
Kuyrkendall, E N. (FBI)
Richards, Jason R. (FBI)
Atkinson, Karen (USAFLS)

Read

Read: 7/18/2008 4:53 PM
Read: 7/18/2008 4:51 PM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 6:22 PM
To: Sloman, Jeff (USAFLS); Acosta, Alex (USAFLS); Atkinson, Karen (USAFLS)
Cc: Richards, Jason (BOP); Nesbitt Kuyrkendall (E.Kuyrkendall@ic.fbi.gov)
Subject: Tein Ltr 080717.pdf

Hi all – I just faxed out the letter, here is the electronic version with the fax confirmation sheets.



Tein Ltr
080717.pdf

Villafana, Ann Marie C. (USAFLS)

From: Sloman, Jeff (USAFLS)
Sent: Thursday, July 17, 2008 3:11 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: Emailing: 080717 Tein Ltr.wpd

Okey dokey.

-----Original Message-----

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 3:02 PM
To: Sloman, Jeff (USAFLS)
Subject: Re: Emailing: 080717 Tein Ltr.wpd

Hi jeff. I am still being held hostage at the county courthouse but I will revise and send tonight.
Thanks.

----- Original Message -----

From: Sloman, Jeff (USAFLS)
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Atkinson, Karen (USAFLS); Lee, Dexter (USAFLS)
Sent: Thu Jul 17 14:51:28 2008
Subject: RE: Emailing: 080717 Tein Ltr.wpd

Marie,

Tein may be trying to bait us into declaring the matter closed when it's technically deferred/suspended. As a result, I've revised your draft which you may be able to color in a bit. Let me know what you think. Thanks,

Jeff

-----Original Message-----

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 11:38 AM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Atkinson, Karen (USAFLS); Lee, Dexter (USAFLS)
Subject: Emailing: 080717 Tein Ltr.wpd

-----Original Message-----

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 11:38 AM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Atkinson, Karen (USAFLS); Lee, Dexter (USAFLS)
Subject: Emailing: 080717 Tein Ltr.wpd

Here it is. Feel free to revise. I have listed myself as the author, but it may be more powerful coming from someone else.

The message is ready to be sent with the following file or link attachments:

080717 Tein Ltr.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 3:02 PM
To: Sloman, Jeff (USAFLS)
Subject: Re: Emailing: 080717 Tein Ltr.wpd

Hi jeff. I am still being held hostage at the county courthouse but I will revise and send tonight.
Thanks.

----- Original Message -----

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To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Atkinson, Karen (USAFLS); Lee, Dexter (USAFLS)
Sent: Thu Jul 17 14:51:28 2008
Subject: RE: Emailing: 080717 Tein Ltr.wpd

Marie,

Tein may be trying to bait us into declaring the matter closed when it's technically deferred/suspended. As a result, I've revised your draft which you may be able to color in a bit. Let me know what you think. Thanks,

Jeff

-----Original Message-----

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 11:38 AM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Atkinson, Karen (USAFLS); Lee, Dexter (USAFLS)
Subject: Emailing: 080717 Tein Ltr.wpd

-----Original Message-----

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 11:38 AM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Atkinson, Karen (USAFLS); Lee, Dexter (USAFLS)
Subject: Emailing: 080717 Tein Ltr.wpd

Here it is. Feel free to revise. I have listed myself as the author, but it may be more powerful coming from someone else.

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080717 Tein Ltr.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 1:31 PM
To: Sloman, Jeff (USAFLS)
Subject: Funny epstein story

Well, jeff, epstein's pricey lawyers may have cost him \$200 million. I reviewed the docket sheets for the 4 pending federal suits (they are all jeff herman suits) and judge marra has issued orders to show cause why default judgments shouldn't be entered for all 4. Herman asked for \$50 million in each one. Apparently epstein tried to avoid service and ignored the deadline when the complaints were mailed to him (thinking that was ineffective service). All I can say is, so much money, so little skill.

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 11:38 AM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Atkinson, Karen (USAFLS); Lee, Dexter (USAFLS)
Subject: Emailing: 080717 Tein Ltr.wpd
Attachments: 080717 Tein Ltr.wpd

Here it is. Feel free to revise. I have listed myself as the author, but it may be more powerful coming from someone else.

The message is ready to be sent with the following file or link attachments:

080717 Tein Ltr.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 10:14 AM
To: Acosta, Alex (USAFLS)
Subject: RE: Epstein's Court Filings

Do you want to call me or should I call you?

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: Acosta, Alex (USAFLS)
Sent: Thursday, July 17, 2008 9:49 AM
To: Villafana, Ann Marie C. (USAFLS); Lee, Dexter (USAFLS); Sloman, Jeff (USAFLS); Castillo, Annette (USAFLS)
Cc: Atkinson, Karen (USAFLS); Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: Re: Epstein's Court Filings

Let's talk at 10 15.

----- Original Message -----

From: Villafana, Ann Marie C. (USAFLS)
To: Lee, Dexter (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Atkinson, Karen (USAFLS); Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Sent: Thu Jul 17 09:44:08 2008
Subject: Epstein's Court Filings

Hi all - Here are the documents that Mike Tein filed in connection with one of the civil suits pending against Epstein in the District Court. Note that Judge Marra is assigned to all of the federal civil suits, and also is the judge on the suit filing against the United States.

Tein filed these ex parte and under seal and claims that all of the civil litigation has to be stayed because "the federal criminal action" is still pending. He discloses that a federal indictment had been prepared and that grand jury proceedings had occurred. I am concerned that this contradicts what Dexter told the Court, namely that a federal prosecution was never contemplated.

<<DE24_080717_Notice of Pendency of Federal Case.pdf>> <<DE23_080717_Motn to File Ex Parte and Under Seal.pdf>>

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

455

EFTA00180001

Recipient
Acosta, Alex (USAFLS)

Read
Read: 7/17/2008 10:21 AM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 10:01 AM
To: Lee, Dexter (USAFLS)
Subject: RE: Epstein's Court Filings

Hey Dexter. I told Irene about Mr. Edwards' vacation, so all is well on that front.

A. Marie Villafana
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Lee, Dexter (USAFLS)
Sent: Thursday, July 17, 2008 9:54 AM
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Atkinson, Karen (USAFLS); Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: RE: Epstein's Court Filings

My recollection is that I told the court no federal prosecution was contemplated by either party, in the event an agreement could be reached. We acknowledged at the hearing that the case had been referred to our office, and the FBI had conducted an investigation. I was attempting to distinguish Dean, where both the U.S. Attorney's Office and British Petroleum were negotiating a plea agreement, but it was clear there was going to be a federal prosecution, whether by a plea agreement or a litigated trial.

Dexter

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 9:44 AM
To: Lee, Dexter (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Atkinson, Karen (USAFLS); Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: Epstein's Court Filings

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Tein filed these ex parte and under seal and claims that all of the civil litigation has to be stayed because “the federal criminal action” is still pending. He discloses that a federal indictment had been prepared and that grand jury proceedings had occurred. I am concerned that this contradicts what Dexter told the Court, namely that a federal prosecution was never contemplated.

<< File: DE24_080717_Notice of Pendency of Federal Case.pdf >> << File: DE23_080717_Motn to File Ex Parte and Under Seal.pdf >>

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

458

EFTA00180004

Recipient
Lee, Dexter (USAFLS)

Read
Read: 7/17/2008 10:03 AM

Villafana, Ann Marie C. (USAFLS)

From: Lee, Dexter (USAFLS)
Sent: Thursday, July 17, 2008 9:54 AM
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Atkinson, Karen (USAFLS); Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: RE: Epstein's Court Filings

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Dexter

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Sent: Thursday, July 17, 2008 9:44 AM
To: Lee, Dexter (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
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Subject: Epstein's Court Filings

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<< File: DE24_080717_Notice of Pendency of Federal Case.pdf >> << File: DE23_080717_Motn to File Ex Parte and Under Seal.pdf >>

A. Marie Villafana
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Villafana, Ann Marie C. (USAFLS)

From: Acosta, Alex (USAFLS)
Sent: Thursday, July 17, 2008 9:49 AM
To: Villafana, Ann Marie C. (USAFLS); Lee, Dexter (USAFLS); Sloman, Jeff (USAFLS); Castillo, Annette (USAFLS)
Cc: Atkinson, Karen (USAFLS); Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: Re: Epstein's Court Filings

Let's talk at 10 15.

----- Original Message -----

From: Villafana, Ann Marie C. (USAFLS)
To: Lee, Dexter (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Atkinson, Karen (USAFLS); Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Sent: Thu Jul 17 09:44:08 2008
Subject: Epstein's Court Filings

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<<DE24_080717_Notice of Pendency of Federal Case.pdf>> <<DE23_080717_Motn to File Ex Parte and Under Seal.pdf>>

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 17, 2008 9:44 AM
To: Lee, Dexter (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Atkinson, Karen (USAFLS); Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: Epstein's Court Filings

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Tein filed these ex parte and under seal and claims that all of the civil litigation has to be stayed because “the federal criminal action” is still pending. He discloses that a federal indictment had been prepared and that grand jury proceedings had occurred. I am concerned that this contradicts what Dexter told the Court, namely that a federal prosecution was never contemplated.



DE24_080717_NDE23_080717_M
tice of Pendency.tn to File Ex Pa..

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

Recipient

Lee, Dexter (USAFLS)
Acosta, Alex (USAFLS)
Sloman, Jeff (USAFLS)
Atkinson, Karen (USAFLS)
Kuyrkendall, E N. (FBI)
Richards, Jason R. (FBI)
Yera, E.J. (USAFLS)

Read

Read: 7/17/2008 9:45 AM
Read: 7/17/2008 9:45 AM
Read: 7/17/2008 9:44 AM

Read: 7/17/2008 10:00 AM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 6:53 PM
To: Sloman, Jeff (USAFLS); Valle, Alicia (USAFLS); Acosta, Alex (USAFLS); Lee, Dexter (USAFLS)
Cc: Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI); Atkinson, Karen (USAFLS)
Subject: Emailing: webmmkepstein0715.htm

Wow -- these guys work fast. Here is the Palm Beach Daily News report re Epstein.



webmmkepstein
0715.htm

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 6:33 PM
To: Lee, Dexter (USAFLS)
Subject: Stipulation in Word Perfect Format

Hi Dexter – I have been called up for jury duty tomorrow (can you believe it?). So here is the stipulation in Word Perfect format. Nesbitt is going to contact you directly tomorrow with any changes and with the two missing dates. I will call Brad Edwards and let him know that you will be in touch tomorrow.

I will bring my Blackberry with me, but don't know how much I will be able to check it.

Thank you.



Stipulation.wpd

A. Marie Villafana
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Recipient
Lee, Dexter (USAFLS)

Read
Read: 7/15/2008 6:36 PM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 6:31 PM
To: Kuyrkendall, E N. (FBI)
Subject: RE: Stipulation in Jane Doe Case

That is fine. Hope all is okay.

I have jury duty tomorrow so can you e-mail Dexter directly?

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: Kuyrkendall, E N. (FBI)
Sent: Tuesday, July 15, 2008 6:20 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Re: Stipulation in Jane Doe Case

Marie, I've been out on another matter. I will get that info to u first thing in the morn if that is ok.

----- Original Message -----

From: Villafana, Ann Marie C. (USAFLS) <Ann.Marie.C.Villafana@usdoj.gov>
To: Lee, Dexter (USAFLS); Kuyrkendall, E N.; Richards, Jason R.
Sent: Tue Jul 15 18:16:49 2008
Subject: Stipulation in Jane Doe Case

Hi Nesbitt and Jason - Can you double check the facts and give me the two missing dates?

Dexter - This is my draft. I will wait to hear back from you before I send it to Edwards. Thanks.

<<Stipulation.pdf>>

A. Marie Villafaña

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

Fax 561 820-8777

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 6:17 PM
To: Lee, Dexter (USAFLS); Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: Stipulation in Jane Doe Case

Hi Nesbitt and Jason – Can you double check the facts and give me the two missing dates?

Dexter – This is my draft. I will wait to hear back from you before I send it to Edwards. Thanks.



Stipulation.pdf

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Recipient

Lee, Dexter (USAFLS)
Kuyrkendall, E N. (FBI)
Richards, Jason R. (FBI)

Read

Read: 7/15/2008 6:17 PM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 4:35 PM
To: Richards, Jason R. (FBI); Kuyrkendall, E N. (FBI)
Subject: Date you met with C.W.

Hi Jason and Nesbitt – Did you ever find your notes? Do you know what date you met with C.W.? and what city was the meeting in?

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 4:30 PM
To: Valle, Alicia (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

We moved to have them sealed but the Judge denied the motion, so they are all publicly available.

A. Marie Villafana
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Valle, Alicia (USAFLS)
Sent: Tuesday, July 15, 2008 4:27 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

None sealed, correct??

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 4:24 PM
To: Valle, Alicia (USAFLS); Lee, Dexter (USAFLS)
Cc: Sloman, Jeff (USAFLS); Acosta, Alex (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

Here is the scanned file-stamped copies of our filings. Along with the filings of the Jane Does from PACER.

<< File: DE2_080707_Cert of Emergency.pdf >> << File: DE1_080707_Petition.pdf >> << File: DE9_080711_Reply Brief.pdf >> << File: In Re Jane Doe001.pdf >>

A. Marie Villafana
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Valle, Alicia (USAFLS)
Sent: Tuesday, July 15, 2008 4:22 PM
To: Lee, Dexter (USAFLS)
Cc: Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS); Acosta, Alex (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

Ok – just got off the phone with her.

Can you send me copies of the docs, which I will forward to her? thanks, aov

From: Lee, Dexter (USAFLS)

Sent: Tuesday, July 15, 2008 2:15 PM

To: Valle, Alicia (USAFLS)

Cc: Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS); Acosta, Alex (USAFLS)

Subject: In Re Jane Doe - Call from Palm Beach Daily News

Alicia,

I just received a phone call from Maggie Kacoha of the Palm Beach Daily News, (561) 820-3850, asking about the Jane Doe case. She told me they were tied up on Friday and unable to attend the hearing before Judge Marra. She said she had read the Sun Sentinel article and wanted to confirm that : (1) the government argued the court had no jurisdiction; and (2) the district court agreed.

I gave her your name and said someone would be calling her back. I told her that the filings had all been unsealed and she could access them through PACER. I did confirm that the government argued the court did not have jurisdiction, but said the case was not over. I declined to make any other comments.

When the hearing concluded last Friday, Judge Marra left it up to the parties to advise the court whether an evidentiary hearing was needed. If the answer is yes, then the court will schedule a hearing. If the answer is no, then I assume the court will go ahead and rule on the papers filed.

If you need copies of what the government filed, please let me know. Thanks.

Dexter

Recipient
Valle, Alicia (USAFLS)

Read
Read: 7/15/2008 4:40 PM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 4:31 PM
To: Valle, Alicia (USAFLS); Lee, Dexter (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

The motion has been taken under advisement. The parties are conferring to determine if an evidentiary hearing is necessary.

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Valle, Alicia (USAFLS)
Sent: Tuesday, July 15, 2008 4:25 PM
To: Villafana, Ann Marie C. (USAFLS); Lee, Dexter (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

Perfect – I will forward to her.
So, in a nutshell, what was the result of the hearing on Friday?

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 4:24 PM
To: Valle, Alicia (USAFLS); Lee, Dexter (USAFLS)
Cc: Sloman, Jeff (USAFLS); Acosta, Alex (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

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A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Valle, Alicia (USAFLS)
Sent: Tuesday, July 15, 2008 4:22 PM

To: Lee, Dexter (USAFLS)
Cc: Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS); Acosta, Alex (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

Ok – just got off the phone with her.
Can you send me copies of the docs, which I will forward to her? thanks, aov

From: Lee, Dexter (USAFLS)
Sent: Tuesday, July 15, 2008 2:15 PM
To: Valle, Alicia (USAFLS)
Cc: Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS); Acosta, Alex (USAFLS)
Subject: In Re Jane Doe - Call from Palm Beach Daily News

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Dexter

Recipient

Valle, Alicia (USAFLS)

Lee, Dexter (USAFLS)

Read

Read: 7/15/2008 4:40 PM

Read: 7/15/2008 4:38 PM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 4:24 PM
To: Valle, Alicia (USAFLS); Lee, Dexter (USAFLS)
Cc: Sloman, Jeff (USAFLS); Acosta, Alex (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

Here is the scanned file-stamped copies of our filings. Along with the filings of the Jane Does from PACER.



DE2_080707_CeDE1_080707_PetDE9_080711_Re In Re Jane
of Emergency.p. ition.pdf ply Brief.pdf Doe001.pdf

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Valle, Alicia (USAFLS)
Sent: Tuesday, July 15, 2008 4:22 PM
To: Lee, Dexter (USAFLS)
Cc: Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS); Acosta, Alex (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

Ok – just got off the phone with her.
Can you send me copies of the docs, which I will forward to her? thanks, aov

From: Lee, Dexter (USAFLS)
Sent: Tuesday, July 15, 2008 2:15 PM
To: Valle, Alicia (USAFLS)
Cc: Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS); Acosta, Alex (USAFLS)
Subject: In Re Jane Doe - Call from Palm Beach Daily News

Alicia,

I just received a phone call from Maggie Kacoha of the Palm Beach Daily News, (561) 820-3850, asking about the Jane Doe case. She told me they were tied up on Friday and unable to attend the hearing before Judge Marra. She said she had read the Sun Sentinel article and wanted to confirm that : (1) the government argued the court had no jurisdiction; and (2) the district court agreed.

I gave her your name and said someone would be calling her back. I told her that the filings had all been unsealed and she could access them through PACER. I did confirm that the government argued the court did not have jurisdiction, but said the case was not over. I declined to make any other comments.

When the hearing concluded last Friday, Judge Marra left it up to the parties to advise the court whether an evidentiary hearing was needed. If the answer is yes, then the court will schedule a hearing. If the answer is no, then I assume the court will go ahead and rule on the papers filed.

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Valle, Alicia (USAFLS)

Lee, Dexter (USAFLS)

Sloman, Jeff (USAFLS)

Acosta, Alex (USAFLS)

Read

Read: 7/15/2008 4:25 PM

Read: 7/15/2008 4:36 PM

Read: 7/15/2008 4:25 PM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 4:21 PM
To: Lee, Dexter (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

Hi Dexter – Just got a voicemail from Brad. I will draft something up and will forward it to you before I send it over to him.

Thanks.

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Lee, Dexter (USAFLS)
Sent: Tuesday, July 15, 2008 3:44 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

Marie,

I have heard nothing from Edwards. My recollection is that you told him you would prepare a document for joint filing, once we agreed after the hearing that an evidentiary hearing was not necessary for either side. We were going to detail what occurred at the meeting between Nesbitt and Jason at Publix with C.W., and Edwards was going to provide C.W.'s perception of what she was told by Nesbitt and Jason.

Dexter

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 3:09 PM
To: Lee, Dexter (USAFLS)
Subject: RE: In Re Jane Doe - Call from Palm Beach Daily News

Hi Dexter – Have you heard any more from Mr. Edwards? I don't like to keep Judge Marra waiting. He is our nicest judge, so I like to be as responsive as possible.

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Dexter

Tracking:

496

EFTA00180032

Recipient
Lee, Dexter (USAFLS)

Read
Read: 7/15/2008 3:41 PM

Villafana, Ann Marie C. (USAFLS)

From: Lee, Dexter (USAFLS)
Sent: Tuesday, July 15, 2008 2:15 PM
To: Valle, Alicia (USAFLS)
Cc: Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS); Acosta, Alex (USAFLS)
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Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 1:26 PM
To: Richards, Jason R. (FBI)
Subject: RE: Calls

Hi Jason -- Yes, that is fine, unless I am selected for jury duty, which seems unlikely.

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: Richards, Jason R. (FBI)
Sent: Tuesday, July 15, 2008 1:02 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Re: Calls

Are you available to meet with Aris and her mom on Thur. at 3:30. Julia was very uncooperative with Twila today.

----- Original Message -----

From: Villafana, Ann Marie C. (USAFLS) <Ann.Marie.C.Villafana@usdoj.gov>
To: Richards, Jason R.
Sent: Tue Jul 15 12:00:40 2008
Subject: Re: Calls

Hi jason. I am out of the office right now. It is jason at south carolina victim's action network (www.scvan.org) and pauline mandel at maryland crime victims' services (www.mdcrimevictims.org)

----- Original Message -----

From: Richards, Jason R. (FBI)
To: Villafana, Ann Marie C. (USAFLS)
Sent: Tue Jul 15 11:32:17 2008
Subject: Re: Calls

Call me when you get a chance. Twila on hold re: notifications. Any word from Marra?

----- Original Message -----

From: Villafana, Ann Marie C. (USAFLS) <Ann.Marie.C.Villafana@usdoj.gov>
To: Kuyrkendall, E N.; Richards, Jason R.; Smith, Twiler ■.
Sent: Mon Jul 14 16:16:08 2008
Subject: FW: Calls

Hi all -- Wasn't sure this went through last time.

On another note, do you guys have an office in Ft Pierce?

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: Villafana, Ann Marie C. (USAFLS)
Sent: Monday, July 14, 2008 2:14 PM
To: Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: Calls

Hi guys. I am stuck in the rain. If you want to start calling here are my thoughts.

We are calling to inform you about the resolution of the Epstein investigation and to thank you for your help.

Mr Epstein pled guilty to one child sex offense that will require him to register as a sex offender for life and received a sentence of 18 months imprisonment followed by one year of home confinement. Mr Epstein also made a concession regarding the payment of restitution.

All of these terms are set out in a letter that AUSA Villafana is going to send out. Do you have a lawyer? Get name and address. If not where do you want letter sent? If you have questions when you receive the letter, please understand that we cannot provide legal advice but the lawyers at the following victims rights organizations are able to help you at no cost to you. (Provide the names and phone numbers) Also ask about counseling and let them know that counseling is still available even though the investigation is closed.

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From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 15, 2008 12:01 PM
To: Richards, Jason R. (FBI)
Subject: Re: Calls

Hi Jason. I am out of the office right now. It is Jason at South Carolina Victim's Action Network (www.scvan.org) and Pauline Mandel at Maryland Crime Victims' Services (www.mdcrimevictims.org)

----- Original Message -----

From: Richards, Jason R. (FBI)
To: Villafana, Ann Marie C. (USAFLS)
Sent: Tue Jul 15 11:32:17 2008
Subject: Re: Calls

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To: Kuyrkendall, E N.; Richards, Jason R.; Smith, Twiler
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From: Richards, Jason R. (FBI)
Sent: Tuesday, July 15, 2008 11:32 AM
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From: Richards, Jason R. (FBI)
Sent: Tuesday, July 15, 2008 11:12 AM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Re: Calls

Hi Marie, do you have the names and numbers of the pro bono attorneys available for the victims?

----- Original Message -----

From: Villafana, Ann Marie C. (USAFLS) <Ann.Marie.C.Villafana@usdoj.gov>
To: Kuyrkendall, E N.; Richards, Jason R.; Smith, Twiler
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From: Villafana, Ann Marie C. (USAFLS)
Sent: Monday, July 14, 2008 4:54 PM
To: Lee, Dexter (USAFLS)
Cc: Atkinson, Karen (USAFLS)
Subject: RE: Conversation with Mike Tein

Thank you, Dexter.

A. Marie Villafaña
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To: Villafana, Ann Marie C. (USAFLS)
Subject: Conversation with Mike Tein

Marie,

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Atkinson, Karen (USAFLS)

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Read: 7/14/2008 5:02 PM

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Sent: Monday, July 14, 2008 12:17 PM
To: Lee, Dexter (USAFLS)
Cc: Atkinson, Karen (USAFLS)
Subject: RE: Jane Doe Hearing

Hi Dexter – I haven't heard any more from Jack and I haven't received any faxes, so perhaps the storm has passed. If you would like to call him, his phone number is 561.659.8300.

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Lee, Dexter (USAFLS)
Sent: Monday, July 14, 2008 10:20 AM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: Jane Doe Hearing

Marie,

I left early on Friday since I had to take care of some matters before my Air Force reserve duty at Homestead AFB this weekend. If you want me to participate in a conference with Mr. Goldberger, I will be happy to do so.

Dexter

From: Villafana, Ann Marie C. (USAFLS)
Sent: Friday, July 11, 2008 3:04 PM
To: Lee, Dexter (USAFLS)
Subject: RE: Jane Doe Hearing

Hi Dexter – I really think you should be on this call with Jack Goldberger, if you feel a response is required.

A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

From: Lee, Dexter (USAFLS)
Sent: Friday, July 11, 2008 2:33 PM
To: Herd, Kim (USAEO); Neal, Kristina (USAEO); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Villafana, Ann Marie C. (USAFLS); Jacobus, Wendy (USAFLS)
Subject: Jane Doe Hearing

Colleagues,

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In my portion of the argument, I advised the court of the status of Epstein's state case: (1) he entered pleas of guilty to two state charges on June 30, 2008; (2) he was sentenced to 18 months' incarceration and 1 year of community control; and (3) he was serving his sentence of incarceration. The court queried me on the Dean case and the government's position on when the rights in section 3371(a) applied. I distinguished Dean and argued that rights under 3771(a) does not accrue until a charge is filing in district court. I noted that the A/G's guidelines are applied with common sense, such that a victim claiming they were being threatened by a perpetrator would not be turned away since an indictment had not been returned. I also argued that 18 U.S.C. 3771 did not grant authority to the court to set aside the agreement in the instant case, since it was not a plea agreement filed with court, which it had the discretion to accept or reject. The court had questions regarding the completion of the agreement in September 2007, but the plea was not entered until June 30, 2008. I advised the court that Epstein's attorneys sought higher review of the agreement within the DOJ.

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Dexter

Recipient

Lee, Dexter (USAFLS)

Atkinson, Karen (USAFLS)

Read

Read: 7/14/2008 12:17 PM

Read: 7/14/2008 12:48 PM

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Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Friday, July 11, 2008 2:18 PM
To: Kuyrkendall, E N. (FBI)
Subject: RE: Notice of Disclosure

I am at 209-1021

A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

-----Original Message-----

From: Kuyrkendall, E N. (FBI)
Sent: Friday, July 11, 2008 2:17 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Re: Notice of Disclosure

We are calling your office.

----- Original Message -----

From: Villafana, Ann Marie C. (USAFLS) <Ann.Marie.C.Villafana@usdoj.gov>
To: Kuyrkendall, E N.; Richards, Jason R.
Sent: Fri Jul 11 14:15:19 2008
Subject: FW: Notice of Disclosure

Are you sure you are still with me?

A. Marie Villafaña

Assistant U.S. Attorney

561 209-1047

From: Villafana, Ann Marie C. (USAFLS)
Sent: Friday, July 11, 2008 1:42 PM
To: Atkinson, Karen (USAFLS); Lee, Dexter (USAFLS)
Subject: FW: Notice of Disclosure

I'm not going to call him by myself, so who wants to join me?

A. Marie Villafaña

Assistant U.S. Attorney

561 209-1047

From: Jack Goldberger [mailto:jgoldberger@agwpa.com]
Sent: Friday, July 11, 2008 1:18 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: Notice of Disclosure

Please call me in regard to this

Jack goldberger

From: Villafana, Ann Marie C. (USAFLS) [mailto:Ann.Marie.C.Villafana@usdoj.gov]
Sent: Friday, July 11, 2008 12:01 PM
To: Jack Goldberger
Cc: Lee, Dexter (USAFLS); Atkinson, Karen (USAFLS)
Subject: Notice of Disclosure

Dear Mr. Goldberger:

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Lee, Dexter (USAFLS)

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Read: 7/11/2008 2:55 PM

Read: 7/11/2008 2:05 PM

Villafana, Ann Marie C. (USAFLS)

From: Kuyrkendall, E N. (FBI)
Sent: Friday, July 11, 2008 12:25 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Re: Notice of Disclosure

No, but I'll be sure to look in tomorrows Sun Sent for the much deserve praise for our hard work. Hey for the record we can't break up the team now so we will be here for any tar and feathering:)

----- Original Message -----

From: Villafana, Ann Marie C. (USAFLS) <Ann.Marie.C.Villafana@usdoj.gov>
To: Kuyrkendall, E N.
Sent: Fri Jul 11 12:17:02 2008
Subject: RE: Notice of Disclosure

No, thanks, I want to spend the next year investigating Matt and Lilly. Did Jason show you the press release that I found?

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

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From: Kuyrkendall, E N. (FBI)
Sent: Friday, July 11, 2008 12:03 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Re: Notice of Disclosure

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To: Jack Goldberger <jgoldberger@agwpa.com>
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Sent: Fri Jul 11 11:55:14 2008
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From: Sloman, Jeff (USAFLS)
Sent: Friday, July 11, 2008 11:58 AM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: Notice of Disclosure

Marie,

I have another question about today's hearing. Please call me at my desk. Thanks,

Jeff
305-961-9299

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To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Subject: Just got back from Epstein hearing

Importance: High

We need to talk. Dexter, Karen and I are at 561 209-1021

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From: Kuyrkendall, E N. (FBI)
Sent: Thursday, July 10, 2008 5:34 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Re: Proposed response to Goldberger's letter

Looks great! He will try to push u for more but I agree with your stance to provide him with only the info we have agreed to in the NPAgreement (no more no less) as our position is not to be involved in the civil process. Hey and thanks for understanding the position of notification (Jason and I had some extensive debate on the matter). See u tomorrow.

----- Original Message -----

From: Villafana, Ann Marie C. (USAFLS) <Ann.Marie.C.Villafana@usdoj.gov>
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Atkinson, Karen (USAFLS)
Cc: Kuyrkendall, E N.; Richards, Jason R.
Sent: Thu Jul 10 17:12:26 2008
Subject: Proposed response to Goldberger's letter

<<080710 Response to Goldberger ltr re notification.wpd>> Please let me know if this is alright to fax out today. I can see no reason for us to disclose any of the additional information that they have requested.

The message is ready to be sent with the following file or link attachments:

080710 Response to Goldberger ltr re notification.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Villafana, Ann Marie C. (USAFLS)

From: Sloman, Jeff (USAFLS)
Sent: Thursday, July 10, 2008 5:15 PM
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Atkinson, Karen (USAFLS)
Cc: Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: Re: Proposed response to Goldberger's letter

Fine

----- Original Message -----

From: Villafana, Ann Marie C. (USAFLS)
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Atkinson, Karen (USAFLS)
Cc: Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Sent: Thu Jul 10 17:12:26 2008
Subject: Proposed response to Goldberger's letter

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080710 Response to Goldberger ltr re notification.wpd

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Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 10, 2008 5:12 PM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Atkinson, Karen (USAFLS)
Cc: Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: Proposed response to Goldberger's letter
Attachments: 080710 Response to Goldberger ltr re notification.wpd

Please let me know if this is alright to fax out today. I can see no reason for us to disclose any of the additional information that they have requested.

The message is ready to be sent with the following file or link attachments:

080710 Response to Goldberger ltr re notification.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 10, 2008 4:59 PM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Atkinson, Karen (USAFLS)
Cc: Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: 080710 Goldberger Ltr to A Marie C Villafana Esquire.pdf

Hi all -- This letter just arrived from Jack Goldberger. I will prepare a response.



080710
berger Ltr to A f

Here is the final victim list that is going out to Goldberger via certified mail this afternoon.



080710 Final
/ictim List for G..

P.S. This is the final version of the letter that I sent to Jack yesterday:



080709 Ltr to
oldberger re No.

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 10, 2008 9:47 AM
To: Kuyrkendall, E N. (FBI)
Subject: RE: Hearing on Jane Doe Petition

Yes please. We should try to get as many notifications out as possible today. I am preparing a log.

A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

-----Original Message-----

From: Kuyrkendall, E N. (FBI)
Sent: Thursday, July 10, 2008 9:36 AM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Re: Hearing on Jane Doe Petition

Do u still want us to come over this morning.

----- Original Message -----

From: Villafana, Ann Marie C. (USAFLS) <Ann.Marie.C.Villafana@usdoj.gov>
To: Lee, Dexter (USAFLS)
Cc: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Richards, Jason R.; Kuyrkendall, E N.
Sent: Thu Jul 10 09:26:40 2008
Subject: Hearing on Jane Doe Petition

Hi Dexter:

I just received a message from Judge Marra's CRD. He would like to set a hearing for 10:15 tomorrow. Are you available?

A. Marie Villafaña

Assistant U.S. Attorney

561 209-1047

Villafana, Ann Marie C. (USAFLS)

From: Lee, Dexter (USAFLS)
Sent: Thursday, July 10, 2008 9:34 AM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: Hearing on Jane Doe Petition

Marie,

Can you call me at (305) 961-9320? I tried your number but I think you are working in another office. Thanks.

Dexter

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 10, 2008 9:32 AM
To: Lee, Dexter (USAFLS)
Subject: RE: Hearing on Jane Doe Petition

Thanks, Dexter. I will ask both Nesbitt and Jason to attend. What documents should I bring with me? And how much information is the office willing to share with the Judge if he asks, what I think will be the big question, namely:

If this deal was signed in September, why didn't the victims receive notification until yesterday?

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

From: Lee, Dexter (USAFLS)
Sent: Thursday, July 10, 2008 9:28 AM
To: Villafana, Ann Marie C. (USAFLS)
Cc: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Richards, Jason R. (FBI); Kuyrkendall, E N. (FBI)
Subject: RE: Hearing on Jane Doe Petition

Marie,

I received the same call. I'll be there.

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 10, 2008 9:27 AM
To: Lee, Dexter (USAFLS)
Cc: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Richards, Jason R. (FBI); Kuyrkendall, E N. (FBI)
Subject: Hearing on Jane Doe Petition
Importance: High

Hi Dexter:

I just received a message from Judge Marra's CRD. He would like to set a hearing for 10:15 tomorrow. Are you available?

A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

Villafana, Ann Marie C. (USAFLS)

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To: Lee, Dexter (USAFLS)
Subject: RE: Hearing on Jane Doe Petition

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A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

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To: Villafana, Ann Marie C. (USAFLS)
Cc: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Richards, Jason R. (FBI); Kuyrkendall, E N. (FBI)
Subject: RE: Hearing on Jane Doe Petition

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Sent: Thursday, July 10, 2008 9:27 AM
To: Lee, Dexter (USAFLS)
Cc: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Richards, Jason R. (FBI); Kuyrkendall, E N. (FBI)
Subject: Hearing on Jane Doe Petition
Importance: High

Hi Dexter:

I just received a message from Judge Marra's CRD. He would like to set a hearing for 10:15 tomorrow. Are you available?

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

Tracking:

550

EFTA00180082

Recipient
Lee, Dexter (USAFLS)

Read
Read: 7/10/2008 9:32 AM

Villafana, Ann Marie C. (USAFLS)

From: Lee, Dexter (USAFLS)
Sent: Thursday, July 10, 2008 9:28 AM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Jacobus, Wendy (USAFLS); Villafana, Ann Marie C. (USAFLS)
Cc: Herd, Kim (USAEO); Neal, Kristina (USAEO)
Subject: In Re Jane Doe - Hearing on July 11, 2008 at 10:15 a.m.

Alex,

I just received a call from Judge Marra's Chambers. He has scheduled a hearing on the victim's petition for Friday, July 11, 2008, at 10:15 a.m. Can we have the FBI case agent present at the hearing?

Dexter

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Thursday, July 10, 2008 9:27 AM
To: Lee, Dexter (USAFLS)
Cc: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Richards, Jason R. (FBI); Kuyrkendall, E N. (FBI)
Subject: Hearing on Jane Doe Petition
Importance: High

Hi Dexter:

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A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

Recipient

Lee, Dexter (USAFLS)
Acosta, Alex (USAFLS)
Sloman, Jeff (USAFLS)
Richards, Jason R. (FBI)
Kuyrkendall, E N. (FBI)

Read

Read: 7/10/2008 9:28 AM
Read: 7/10/2008 9:46 AM
Read: 7/10/2008 9:33 AM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 9:21 PM
To: Lee, Dexter (USAFLS)
Subject: Re: Conversation with Chambers

Hi dexter. I don't know what happened. I left at 4:00 and everything had already gone to the courthouse. Our clerk's office is the worst so I should have sent a courtesy copy directly to Judge Marra. I am sorry for the trouble.

----- Original Message -----

From: Lee, Dexter (USAFLS)
To: Villafana, Ann Marie C. (USAFLS)
Sent: Wed Jul 09 18:02:00 2008
Subject: Conversation with Chambers

Marie,

I really appreciate you faxing a copy of what we filed to me. At 4:45 p.m., I e-filed my entry of appearance. At approximately 5:15, I received a call from Robert Glass, Judge Marra's law clerk. He told me the Judge had received my notice of appearance, but was wondering what happened to the government's response. At that point, I told him that we had earlier hand-filed a motion to seal, the government's response, and your declaration. He told me he would go down to the Clerk's Office and retrieve it.

At 5:25, Mr. Glass called again to tell me everyone at the Clerk's Office had gone home. Judge Marra was anxious to get the government's response, given the time constraints. I just completed faxing everything to Chambers.

It never ceases to amaze me how one small glitch can render meaningless all the work done on a project.

Dexter

Villafana, Ann Marie C. (USAFLS)

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 6:02 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Conversation with Chambers

Marie,

I really appreciate you faxing a copy of what we filed to me. At 4:45 p.m., I e-filed my entry of appearance. At approximately 5:15, I received a call from Robert Glass, Judge Marra's law clerk. He told me the Judge had received my notice of appearance, but was wondering what happened to the government's response. At that point, I told him that we had earlier hand-filed a motion to seal, the government's response, and your declaration. He told me he would go down to the Clerk's Office and retrieve it.

At 5:25, Mr. Glass called again to tell me everyone at the Clerk's Office had gone home. Judge Marra was anxious to get the government's response, given the time constraints. I just completed faxing everything to Chambers.

It never ceases to amaze me how one small glitch can render meaningless all the work done on a project.

Dexter

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 3:52 PM
To: Lee, Dexter (USAFLS)
Subject: RE: Government's Motion to Seal

Everything is out. Copies will be sent to you via inter-office. Thank you, Dexter, as usual, you came to the rescue!

Can I ask one more favor? Will you e-file a notice of appearance? That way notices of hearings will come to both of us. I have to run to an appointment, but you can get me on the cell phone.

Thanks.

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 2:13 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: Government's Motion to Seal

Marie,

Yes, both the response, your declaration, and the attachments to your declaration, are to be sealed.

Dexter

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 2:06 PM
To: Lee, Dexter (USAFLS)
Subject: RE: Government's Motion to Seal

Hi Dexter – You want to seal my declaration as well, right? Please let me know and I will change accordingly.

Thanks.

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 1:47 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Government's Motion to Seal

Marie,

In preparation for this afternoon's filing, I have prepared a motion to seal, which is attached. I did not include Epstein's name and made general assertions regarding the confidentiality of the negotiations. Please have someone sign both the motion to seal, and the government's response, for me. We then need to prepare a sealed document tracking sheet, to accompany the motion.

An original and one copy of the sealed document should be placed in two separate envelopes, with the case number written on the outside. An original and one copy of the motion to seal should be filed with the Clerk.

Thanks.

Dexter

<< File: victim_Mot_seal.wpd >>

Tracking:

561

EFTA00180090

Recipient
Lee, Dexter (USAFLS)

Read
Read: 7/9/2008 3:54 PM

Villafana, Ann Marie C. (USAFLS)

From: Kuyrkendall, E N. (FBI)
Sent: Wednesday, July 09, 2008 3:41 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: Emailing: Final Victim Notification -- Courtney Wild.wpd

Looks good except for upper lefthand corner of 2nd page "Page 2 of 4". Is that correct? Other than that it looks fine.

Re the Declaration : Hopefully u r referring to the three clients/victims of Mr. Edwards when you state that "...notice of which was provided to the victims on July 09, 2008, is" (We have not notified all victims on this date)

Hey everything else looks great!!!!!!!!!!!!!! See you in the morning let us know a time to be at your office. We will talk about notification process then.

Jason and Nesbitt

From: Villafana, Ann Marie C. (USAFLS) [Ann.Marie.C.Villafana@usdoj.gov]
Sent: Wednesday, July 09, 2008 3:18 PM
To: Richards, Jason R.; Kuyrkendall, E N.
Subject: FW: Emailing: Final Victim Notification -- Courtney Wild.wpd

<<Final Victim Notification -- Courtney Wild.wpd>> Hi guys -- I sent this earlier. Does it look alright?

A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

-----Original Message-----

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 1:24 PM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Lee, Dexter (USAFLS); Atkinson, Karen (USAFLS)
Cc: Richards, Jason R. (FBI); Kuyrkendall, E N. (FBI)
Subject: Emailing: Final Victim Notification -- Courtney Wild.wpd

Attached please find my proposed final victim notification letter. This is addressed to Edwards' client, Courtney Wild. (Please note that all of the victims but one is now an adult and all of Mr. Edwards' clients are adults.)

Please let me know if you would like any changes made. Also, Dexter, please let me know when it is safe to send to Mr. Edwards. The letter for S.R. will be identical.

The message is ready to be sent with the following file or link attachments:

Final Victim Notification -- Courtney Wild.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 3:24 PM
To: Lee, Dexter (USAFLS)
Subject: RE: Revised Draft with DOJ Edits

I added 18 usc 3509(d)(2). It says we don't even need to file a motion, but better safe than sorry.

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 3:10 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: Revised Draft with DOJ Edits

Marie,

Yes, we are ready to file. As far as statutory authority, we can cite the Privacy Act, 5 U.S.C. 552a, et. Seq. Also, are there any special victim-witness provisions regarding restrictions on disclosure of victims' names and personal identifying information?

Dexter

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 3:06 PM
To: Lee, Dexter (USAFLS)
Subject: RE: Revised Draft with DOJ Edits

Hi Dexter – Does this mean your response is good to go? On the sealed document tracking form, is there a particular statute or rule that you think gives us the right to file under seal? Thank you.

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 3:04 PM
To: Herd, Kim (USAEO); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS); Rothenberg, Laurence E (SMO); Wood, Seth M (SMO); Neal, Kristina (USAEO); Manning, Katharine (USAEO)
Subject: RE: Revised Draft with DOJ Edits

Kim,

Thanks to you, Kristina and Katherine for all your help. We'll let you know what happens.

Dexter

From: Herd, Kim (USAEO)
Sent: Wednesday, July 09, 2008 3:02 PM
To: Lee, Dexter (USAFLS); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS); Rothenberg, Laurence E (SMO); Wood, Seth M (SMO); Neal, Kristina (USAEO); Manning, Katharine (USAEO)
Subject: RE: Revised Draft with DOJ Edits

All –

We have checked with OLP and they have cleared the language in your latest revision (per your e-mail below).

Please let us know if you have additional questions.

Thank you for your patience on this –

Kim

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 2:26 PM
To: Herd, Kim (USAEO); Neal, Kristina (USAEO); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Subject: Revised Draft with DOJ Edits

Colleagues,

Attached please find the latest revision, which includes the edits suggested by EOUSA. I have also incorporated the word "place", per Jeff's suggestion. For our DOJ colleagues, there is a new Section III, which goes into detail regarding the contact Marie had with the three victims.

Also, as to whether Edwards raises the right to fairness being violated, I was referring to paragraph five of the emergency petition, which only alleges violations of the right to consultation, notice of public court proceedings, information regarding right to restitution, and notice of rights under the CVRA.

A motion to seal has been prepared, seeking leave of the Court to seal the government's response, Marie's declaration, and the attachments to the declaration.

Dexter Lee

<< File: victim_resp_USArev corrected_DOJEdits.wpd >>

Tracking:

Recipient
Lee, Dexter (USAFLS)

Read
Read: 7/9/2008 3:24 PM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 3:19 PM
To: Richards, Jason R. (FBI); Kuyrkendall, E N. (FBI)
Subject: FW: Emailing: Final Victim Notification -- Courtney Wild.wpd
Attachments: Final Victim Notification -- Courtney Wild.wpd

Hi guys -- I sent this earlier. Does it look alright?

A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

-----Original Message-----

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 1:24 PM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Lee, Dexter (USAFLS); Atkinson, Karen (USAFLS)
Cc: Richards, Jason R. (FBI); Kuyrkendall, E N. (FBI)
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Attached please find my proposed final victim notification letter. This is addressed to Edwards' client, Courtney Wild. (Please note that all of the victims but one is now an adult and all of Mr. Edwards' clients are adults.)

Please let me know if you would like any changes made. Also, Dexter, please let me know when it is safe to send to Mr. Edwards. The letter for S.R. will be identical.

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Cc: Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: Proposed Response to Jack Goldberger

When you have a chance, please review. I don't think this has to go out today. I will not be sending Jack the "cc's" of the notification letters until they have all been sent.



080709

Goldberger ltr re not

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

Tracking:

569

EFTA00180098

Recipient

Acosta, Alex (USAFLS)
Sloman, Jeff (USAFLS)
Atkinson, Karen (USAFLS)
Kuyrkendall, E N. (FBI)
Richards, Jason R. (FBI)

Read

Read: 7/10/2008 9:47 AM
Read: 7/10/2008 11:16 AM

Villafana, Ann Marie C. (USAFLS)

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 3:10 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: Revised Draft with DOJ Edits

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Yes, we are ready to file. As far as statutory authority, we can cite the Privacy Act, 5 U.S.C. 552a, et. Seq. Also, are there any special victim-witness provisions regarding restrictions on disclosure of victims' names and personal identifying information?

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Sent: Wednesday, July 09, 2008 3:06 PM
To: Lee, Dexter (USAFLS)
Subject: RE: Revised Draft with DOJ Edits

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A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

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Sent: Wednesday, July 09, 2008 3:04 PM
To: Herd, Kim (USAEO); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS); Rothenberg, Laurence E (SMO); Wood, Seth M (SMO); Neal, Kristina (USAEO); Manning, Katharine (USAEO)
Subject: RE: Revised Draft with DOJ Edits

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Dexter

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Sent: Wednesday, July 09, 2008 3:02 PM
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Cc: Jacobus, Wendy (USAFLS); Rothenberg, Laurence E (SMO); Wood, Seth M (SMO); Neal, Kristina (USAEO); Manning, Katharine (USAEO)
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Cc: Jacobus, Wendy (USAFLS)
Subject: Revised Draft with DOJ Edits

Colleagues,

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A motion to seal has been prepared, seeking leave of the Court to seal the government's response, Marie's declaration, and the attachments to the declaration.

Dexter Lee

<< File: victim_resp_USArev corrected_DOJEdits.wpd >>

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 3:07 PM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Lee, Dexter (USAFLS)
Subject: Victim Notification Letter

Importance: High

Hi all – We need to get everything ready to go to court by 4:00. It looks like the response and my declaration are ready to go, but I need to send the notification letters to Edwards before everything can be filed. Can you please review and give me your comments? Thank you.



Final Victim
Notification -- C...

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

Tracking:

573

EFTA00180102

Recipient

Acosta, Alex (USAFLS)

Sioman, Jeff (USAFLS)

Lee, Dexter (USAFLS)

Read

Read: 7/10/2008 10:35 AM

Read: 7/9/2008 3:10 PM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 3:06 PM
To: Lee, Dexter (USAFLS)
Subject: RE: Revised Draft with DOJ Edits

Hi Dexter – Does this mean your response is good to go? On the sealed document tracking form, is there a particular statute or rule that you think gives us the right to file under seal? Thank you.

A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 3:04 PM
To: Herd, Kim (USAEO); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS); Rothenberg, Laurence E (SMO); Wood, Seth M (SMO); Neal, Kristina (USAEO); Manning, Katharine (USAEO)
Subject: RE: Revised Draft with DOJ Edits

Kim,

Thanks to you, Kristina and Katherine for all your help. We'll let you know what happens.

Dexter

From: Herd, Kim (USAEO)
Sent: Wednesday, July 09, 2008 3:02 PM
To: Lee, Dexter (USAFLS); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS); Rothenberg, Laurence E (SMO); Wood, Seth M (SMO); Neal, Kristina (USAEO); Manning, Katharine (USAEO)
Subject: RE: Revised Draft with DOJ Edits

All –

We have checked with OLP and they have cleared the language in your latest revision (per your e-mail below).

Please let us know if you have additional questions.

Thank you for your patience on this –

Kim

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 2:26 PM
To: Herd, Kim (USAEO); Neal, Kristina (USAEO); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)

Cc: Jacobus, Wendy (USAFLS)
Subject: Revised Draft with DOJ Edits

Colleagues,

Attached please find the latest revision, which includes the edits suggested by EOUSA. I have also incorporated the word "place", per Jeff's suggestion. For our DOJ colleagues, there is a new Section III, which goes into detail regarding the contact Marie had with the three victims.

Also, as to whether Edwards raises the right to fairness being violated, I was referring to paragraph five of the emergency petition, which only alleges violations of the right to consultation, notice of public court proceedings, information regarding right to restitution, and notice of rights under the CVRA.

A motion to seal has been prepared, seeking leave of the Court to seal the government's response, Marie's declaration, and the attachments to the declaration.

Dexter Lee

<< File: victim_resp_USArev corrected_DOJedits.wpd >>

Recipient
Lee, Dexter (USAFLS)

Read
Read: 7/9/2008 3:06 PM

Villafana, Ann Marie C. (USAFLS)

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 3:04 PM
To: Herd, Kim (USAEO); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS); Rothenberg, Laurence E (SMO); Wood, Seth M (SMO); Neal, Kristina (USAEO); Manning, Katharine (USAEO)
Subject: RE: Revised Draft with DOJ Edits

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Dexter

From: Herd, Kim (USAEO)
Sent: Wednesday, July 09, 2008 3:02 PM
To: Lee, Dexter (USAFLS); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS); Rothenberg, Laurence E (SMO); Wood, Seth M (SMO); Neal, Kristina (USAEO); Manning, Katharine (USAEO)
Subject: RE: Revised Draft with DOJ Edits

All –

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Please let us know if you have additional questions.

Thank you for your patience on this –

Kim

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 2:26 PM
To: Herd, Kim (USAEO); Neal, Kristina (USAEO); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Subject: Revised Draft with DOJ Edits

Colleagues,

Attached please find the latest revision, which includes the edits suggested by EOUSA. I have also incorporated the word "place", per Jeff's suggestion. For our DOJ colleagues, there is a new Section III, which goes into detail regarding the contact Marie had with the three victims.

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A motion to seal has been prepared, seeking leave of the Court to seal the government's response, Marie's declaration, and the attachments to the declaration.

Dexter Lee

<< File: victim_resp_USArev corrected_DOJedits.wpd >>

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 2:52 PM
To: Lee, Dexter (USAFLS)
Subject: RE: Latest Version

Do you anticipate any more changes?

A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 2:48 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Latest Version

Marie,

We're getting close to game time. Here is my corrected version, which takes out deferred prosecution. Please use this version as the one you will be filing. Make the latest changes to this document. Thanks.

Dexter

<< File: victim_resp_USArev corrected_DOJedits(1445).wpd >>

Recipient
Lee, Dexter (USAFLS)

Read
Read: 7/9/2008 3:00 PM

Villafana, Ann Marie C. (USAFLS)

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 2:48 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Latest Version

Marie,

We're getting close to game time. Here is my corrected version, which takes out deferred prosecution. Please use this version as the one you will be filing. Make the latest changes to this document. Thanks.

Dexter



victim_resp_USA
ev corrected_D..

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 2:46 PM
To: Kuyrkendall, E N. (FBI)
Subject: RE: Declaration Looks Great!!!!!!!!!!!!!!
Attachments: Villafana Declaration-v2 final.wpd

Thanks. Here it is with your changes. Can you read through once more. Thank you!

A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

From: Kuyrkendall, E N. (FBI)
Sent: Wednesday, July 09, 2008 2:44 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Declaration Looks Great!!!!!!!!!!!!!!

Jason and I have finished and it looks great!!!!!!!!!!!!!!

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 2:42 PM
To: Lee, Dexter (USAFLS); Acosta, Alex (USAFLS)
Subject: Emailing: victim_resp_USArev corrected_DOJedits.wpd
Attachments: victim_resp_USArev corrected_DOJedits.wpd

Alex and Dexter -- I caught a couple of typos and made one substantive change. Nesbitt says she can't remember whether she handed Courtney's letter to her or if it was mailed after the interview, so I have changed it to say C.W.'s letter was "provided" by the FBI. I will make the same change in my Declaration. I think I made the change that Alex wanted on page 3, but please take a look.

Thanks.

The message is ready to be sent with the following file or link attachments:

victim_resp_USArev corrected_DOJedits.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Recipient

Lee, Dexter (USAFLS)

Acosta, Alex (USAFLS)

Read

Read: 7/9/2008 2:45 PM

Villafana, Ann Marie C. (USAFLS)

From: Kuyrkendall, E N. (FBI)
Sent: Wednesday, July 09, 2008 2:38 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: Emailing: Villafana Declaration-v2 final.wpd

Marie,

Paragraph 7: Should be changed to something similar to this:

.....opening hostile to the prosecution of Epstein. The FBI attempted to interview S.R. in October 2007, at which time she refused to provide any information regarding Jeffrey Epstein.....
(302 of refusal Oct 2, 2007)

Paragraph 8:

.....agreement was signed, four victims were contacted and these provision.....
(we spoke to all four of them in person)

Still readingbut looks good thus far

From: Villafana, Ann Marie C. (USAFLS) [Ann.Marie.C.Villafana@usdoj.gov]
Sent: Wednesday, July 09, 2008 2:17 PM
To: Kuyrkendall, E N.; Richards, Jason R.
Subject: Emailing: Villafana Declaration-v2 final.wpd

<<Villafana Declaration-v2 final.wpd>> Sorry if I seem cranky, I am just getting changes from 12 people at once.

The message is ready to be sent with the following file or link attachments:

Villafana Declaration-v2 final.wpd

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Villafana, Ann Marie C. (USAFLS)

From: Acosta, Alex (USAFLS)
Sent: Wednesday, July 09, 2008 2:37 PM
To: Lee, Dexter (USAFLS); Herd, Kim (USAEO); Neal, Kristina (USAEO); Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Subject: RE: Revised Draft with DOJ Edits

I am just reading this.

I am very concerned, because I have repeatedly edited the phrase "deferred prosecution" and replaced it with an "agreement to defer federal prosecution in favor of prosecution by the State of Florida." The phrase is now back on page 3.

I send the email only to make clear that there is a difference. This is not a deferred federal prosecution. There was a state case, that case was prosecuted, and in light of state guilty plea federal government has agreed not to pursue a state prosecution as well. This matters, because the victims have the opportunity to have their rights vindicated in state court as well.

Not a big deal, but just want to make sure the distinction remains clear in any subsequent drafts.

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 2:26 PM
To: Herd, Kim (USAEO); Neal, Kristina (USAEO); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Subject: Revised Draft with DOJ Edits

Colleagues,

Attached please find the latest revision, which includes the edits suggested by EOUSA. I have also incorporated the word "place", per Jeff's suggestion. For our DOJ colleagues, there is a new Section III, which goes into detail regarding the contact Marie had with the three victims.

Also, as to whether Edwards raises the right to fairness being violated, I was referring to paragraph five of the emergency petition, which only alleges violations of the right to consultation, notice of public court proceedings, information regarding right to restitution, and notice of rights under the CVRA.

A motion to seal has been prepared, seeking leave of the Court to seal the government's response, Marie's declaration, and the attachments to the declaration.

Dexter Lee

<< File: victim_resp_USArev corrected_DOJEdits.wpd >>

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From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 2:26 PM
To: Herd, Kim (USAEO); Neal, Kristina (USAEO); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
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Dexter Lee



victim_resp_USA
ev corrected_D..

Villafana, Ann Marie C. (USAFLS)

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Sent: Wednesday, July 09, 2008 2:17 PM
To: Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: Emailing: Villafana Declaration-v2 final.wpd
Attachments: Villafana Declaration-v2 final.wpd

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Villafana, Ann Marie C. (USAFLS)

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 2:13 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: Government's Motion to Seal

Marie,

Yes, both the response, your declaration, and the attachments to your declaration, are to be sealed.

Dexter

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 2:06 PM
To: Lee, Dexter (USAFLS)
Subject: RE: Government's Motion to Seal

Hi Dexter – You want to seal my declaration as well, right? Please let me know and I will change accordingly.

Thanks.

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 1:47 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Government's Motion to Seal

Marie,

In preparation for this afternoon's filing, I have prepared a motion to seal, which is attached. I did not include Epstein's name and made general assertions regarding the confidentiality of the negotiations. Please have someone sign both the motion to seal, and the government's response, for me. We then need to prepare a sealed document tracking sheet, to accompany the motion.

An original and one copy of the sealed document should be placed in two separate envelopes, with the case number written on the outside. An original and one copy of the motion to seal should be filed with the Clerk.

Thanks.

Dexter

<< File: victim_Mot_seal.wpd >>

Villafana, Ann Marie C. (USAFLS)

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Sent: Wednesday, July 09, 2008 2:06 PM
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Assistant U.S. Attorney
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Thanks.

Dexter

<< File: victim_Mot_seal.wpd >>

Tracking:

Recipient
Lee, Dexter (USAFLS)

Read
Read: 7/9/2008 2:13 PM

Villafana, Ann Marie C. (USAFLS)

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 1:49 PM
To: Acosta, Alex (USAFLS); Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Subject: RE: Latest Version

That was a typographical error, which Marie caught. It has been corrected.

Dexter

From: Acosta, Alex (USAFLS)
Sent: Wednesday, July 09, 2008 1:48 PM
To: Lee, Dexter (USAFLS); Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Subject: RE: Latest Version

This version states that Edwards "did make the contact." I thought he had NOT made the contact to provide the state with information? (2d to last paragraph)

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 12:08 PM
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Subject: Latest Version

Colleagues,

Attached please find the latest version of the government's response. I have added a new Section III, which details the efforts made by Marie in maintaining contact with T.M., C.W., and S.R.

Dexter

<< File: victim_resp_USArev corrected (3).wpd >>

Villafana, Ann Marie C. (USAFLS)

From: Acosta, Alex (USAFLS)
Sent: Wednesday, July 09, 2008 1:48 PM
To: Lee, Dexter (USAFLS); Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
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Dexter

<< File: victim_resp_USArev corrected (3).wpd >>

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To: Villafana, Ann Marie C. (USAFLS)
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Thanks.

Dexter



victim_Mot_seal.
wpd

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 1:24 PM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Lee, Dexter (USAFLS); Atkinson, Karen (USAFLS)
Cc: Richards, Jason R. (FBI); Kuyrkendall, E N. (FBI)
Subject: Emailing: Final Victim Notification -- Courtney Wild.wpd
Attachments: Final Victim Notification -- Courtney Wild.wpd

Attached please find my proposed final victim notification letter. This is addressed to Edwards' client, Courtney Wild. (Please note that all of the victims but one is now an adult and all of Mr. Edwards' clients are adults.)

Please let me know if you would like any changes made. Also, Dexter, please let me know when it is safe to send to Mr. Edwards. The letter for S.R. will be identical.

The message is ready to be sent with the following file or link attachments:

Final Victim Notification -- Courtney Wild.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Recipient

Acosta, Alex (USAFLS)
Sloman, Jeff (USAFLS)
Lee, Dexter (USAFLS)
Atkinson, Karen (USAFLS)
Richards, Jason R. (FBI)
Kuyrkendall, E N. (FBI)

Read

Read: 7/9/2008 1:27 PM
Read: 7/9/2008 1:35 PM
Read: 7/9/2008 1:35 PM
Read: 7/10/2008 11:18 AM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 1:19 PM
To: Lee, Dexter (USAFLS); Herd, Kim (USAEO); Neal, Kristina (USAEO)
Cc: Manning, Katharine (USAEO)
Subject: RE: Victim Notification

The Notification specifically provided that each victim would receive a copy with the names of all other victims redacted. We also have provided the list only by hand delivery to counsel for Mr. Epstein with a cover sheet advising them that disclosing the names to anyone could violate federal and/or state law. That cover sheet will accompany the victim notification even when it is sent to the victims themselves.

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 1:17 PM
To: Herd, Kim (USAEO); Neal, Kristina (USAEO)
Cc: Manning, Katharine (USAEO); Villafana, Ann Marie C. (USAFLS)
Subject: RE: Victim Notification

Kim,

The consensus is that there's nothing to talk to Edwards about because the agreement has been signed and the federal case is over. We will not be reaching out to Edwards to get an extension.

As to the draft notice, Epstein's lawyers raised a similar concern.

Dexter

From: Herd, Kim (USAEO)
Sent: Wednesday, July 09, 2008 1:07 PM
To: Lee, Dexter (USAFLS); Neal, Kristina (USAEO)
Cc: Manning, Katharine (USAEO)
Subject: RE: Victim Notification

Our concern is that the list of individuals contains the names of minors. Have you thought about just listing initials? Or not providing the entire list to each victim?

Also – any word from victim counsel on an extension?

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 12:29 PM
To: Herd, Kim (USAEO); Neal, Kristina (USAEO)
Subject: FW: Victim Notification

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 08, 2008 5:37 PM
To: Acosta, Alex (USAFLS); Lee, Dexter (USAFLS)
Subject: Victim Notification

Hi Alex and Dexter – Here is the proposed notification that was provided to Epstein’s counsel last week.

<< File: Victim Identification and Notification Final with Goldberger sig revised.wpd >>

Assuming that they don’t sign it tomorrow, I would remove the bottom portion that calls for Epstein’s signature and incorporate some instructional language along with notice that Jack Goldberger is the contact person for any civil litigation.

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Recipient

Lee, Dexter (USAFLS)
Herd, Kim (USAEO)
Neal, Kristina (USAEO)
Manning, Katharine (USAEO)

Read

Read: 7/9/2008 1:19 PM
Read: 7/9/2008 1:19 PM
Read: 7/9/2008 1:32 PM
Read: 7/9/2008 1:40 PM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 1:04 PM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Atkinson, Karen (USAFLS)
Cc: Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI)
Subject: Response to Goldberger Letter

Here are my thoughts:

1. **Notification only by mail:** For those girls who are currently not represented (or for whom we do not know of any representation), we intend to contact the victims by telephone to tell them of the resolution and to get mailing addresses to send the written notification or to determine if they have secured counsel to send it to them. For the girls who are represented, contact will be made by telephone followed by the mailing of the notification. I think a "live" thank you is the least that is required at this point and a "check in" to make sure that girls who need counseling are getting it. (FBI has already arranged counseling for several girls.) In any written response to Mr. Goldberger, I would simply ignore this request.
2. **Separate mailings:** I have no objection to this change. The notice was drafted the way it was so that Epstein would only have to sign one document rather than 33. Since he isn't going to sign any, that change is fine with me.
3. **Notification limited to the information on the first page of the draft notification:** In light of Epstein's refusal to sign the acknowledgement, I think some additional explanation is required. I will prepare that revision and send to you shortly.
4. **Eliminate the Acknowledgement portion:** I have no objection to this.
5. **Supplement the notification with our previous statement that we are not vouching for the veracity of any claim:** I would reject this request and, in our response to Goldberger, state that we have limited our list to those whom we were prepared to name in an indictment and, accordingly, we believe that there is proof beyond a reasonable doubt that each was a victim of Epstein's.
6. **Explain why the acknowledgement is required:** In our response to Goldberger, I think we should explain that the acknowledgement language was meant to create a means for proving the existence of the agreement without having to provide copies of the Non-Prosecution Agreement, which contains a confidentiality clause. While I have no objection to revising the language, I think that Epstein's position will lead to litigation regarding the need to disclose the full agreement, which is contrary to the parties' interest in confidentiality. I agree that we cannot force him to sign the acknowledgement, but he must accept the consequences of that decision.
7. **Names of pro bono lawyers and information regarding their communications:** I have already advised Mr. Goldberger that I will provide him with the names and contact information of attorneys who represent the victims, so I have no objection to that. I also have no objection to telling him that they were recommended by the Crime Victims Rights Advocacy Group based upon a referral from the Justice Department. Other than that, I have no intention of disclosing any "communications" that I had with them.

I will take a crack at revising the victim notifications and drafting a response to Goldberger. Any other thoughts I should incorporate?

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

Tracking:

Recipient

Acosta, Alex (USAFLS)
Sloman, Jeff (USAFLS)
Atkinson, Karen (USAFLS)
Kuyrkendall, E N. (FBI)
Richards, Jason R. (FBI)

Read

Read: 7/9/2008 1:26 PM
Read: 7/9/2008 1:05 PM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 12:42 PM
To: Lee, Dexter (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Atkinson, Karen (USAFLS)
Subject: Emailing: Villafana Declaration-v2 final.wpd
Attachments: Villafana Declaration-v2 final.wpd

Hi all -- I think this includes everyone's thoughts. If any changes are needed, please let me know.

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Villafana Declaration-v2 final.wpd

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Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 12:34 PM
To: Lee, Dexter (USAFLS)
Cc: Acosta, Alex (USAFLS)
Subject: RE: Victim Notification

Hi Dexter – Jack Goldberger’s response just arrived – I am sending it in a separate e-mail. I need to revise the letter and make sure Alex and Jeff approve before it goes out, so it won’t be ready until later this afternoon. I just need to make sure that it goes out before I file my Declaration, since I swear that it has gone out to Attorney Edwards.

Thanks.

A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 12:28 PM
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS)
Subject: RE: Victim Notification

Marie,

DOJ wanted us to hold off sending this out until we get clearance to file our document this afternoon. Will that pose any problems?

Dexter

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 08, 2008 5:37 PM
To: Acosta, Alex (USAFLS); Lee, Dexter (USAFLS)
Subject: Victim Notification

Hi Alex and Dexter – Here is the proposed notification that was provided to Epstein’s counsel last week.

<< File: Victim Identification and Notification Final with Goldberger sig revised.wpd >>

Assuming that they don’t sign it tomorrow, I would remove the bottom portion that calls for Epstein’s signature and incorporate some instructional language along with notice that Jack Goldberger is the contact person for any civil litigation.

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047

Fax 561 820-8777

Tracking:

608

EFTA00180134

Recipient

Lee, Dexter (USAFLS)

Acosta, Alex (USAFLS)

Read

Read: 7/9/2008 12:35 PM

Read: 7/9/2008 1:25 PM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 12:35 PM
To: Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS); Atkinson, Karen (USAFLS)
Cc: Kuyrkendall, E N. (FBI); Richards, Jason R. (FBI); Lee, Dexter (USAFLS)
Subject: FW: Jeffrey Epstein -- Response from Jack Goldberger
Attachments: Letter to A. Marie Villafana dated 070908.pdf

Attached please find Jack Goldberger's response to my letter.

A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

-----Original Message-----

From: Nira Alanis [mailto:nalanis@agwpa.com]
Sent: Wednesday, July 09, 2008 12:28 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: Jeffrey Epstein

This attachment has been sent to you on behalf of Jack A. Goldberger, Esquire.

Regards,

Nayanira Alanis,
Legal Assistant
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401
T#561-659-8300
F#561-835-8691

Tracking:

610

EFTA00180136

Recipient

Acosta, Alex (USAFLS)
Sloman, Jeff (USAFLS)
Atkinson, Karen (USAFLS)
Kuyrkendall, E N. (FBI)
Richards, Jason R. (FBI)
Lee, Dexter (USAFLS)

Read

Read: 7/9/2008 1:26 PM
Read: 7/9/2008 1:32 PM
Read: 7/10/2008 11:14 AM

Read: 7/9/2008 12:35 PM

Villafana, Ann Marie C. (USAFLS)

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 12:28 PM
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS)
Subject: RE: Victim Notification

Marie,

DOJ wanted us to hold off sending this out until we get clearance to file our document this afternoon. Will that pose any problems?

Dexter

From: Villafana, Ann Marie C. (USAFLS)
Sent: Tuesday, July 08, 2008 5:37 PM
To: Acosta, Alex (USAFLS); Lee, Dexter (USAFLS)
Subject: Victim Notification

Hi Alex and Dexter – Here is the proposed notification that was provided to Epstein’s counsel last week.

<< File: Victim Identification and Notification Final with Goldberger sig revised.wpd >>

Assuming that they don’t sign it tomorrow, I would remove the bottom portion that calls for Epstein’s signature and incorporate some instructional language along with notice that Jack Goldberger is the contact person for any civil litigation.

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 12:22 PM
To: Acosta, Alex (USAFLS); Lee, Dexter (USAFLS)
Cc: Sloman, Jeff (USAFLS); Atkinson, Karen (USAFLS)
Subject: Revised Declaration

I removed the sentence about why the Palm Beach Police contacted FBI for assistance. I notice that the language regarding my securing pro bono counsel for C.W. was removed. I think it shows how far we went out of our way to protect the victims, especially Mr. Edwards' clients. Is it alright to put it back in?

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

Recipient

Acosta, Alex (USAFLS)
Lee, Dexter (USAFLS)
Sloman, Jeff (USAFLS)
Atkinson, Karen (USAFLS)

Read

Read: 7/9/2008 1:25 PM
Read: 7/9/2008 12:22 PM
Read: 7/9/2008 2:05 PM

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 12:15 PM
To: Lee, Dexter (USAFLS)
Subject: Emailing: victim_resp_USArev corrected (3).wpd
Attachments: victim_resp_USArev corrected (3).wpd

Hi Dexter -- I caught one date error and an important "not" in the last section -
- as far as I know, Edwards did NOT make contact with the State Attorney's
Office.

The message is ready to be sent with the following file or link attachments:

victim_resp_USArev corrected (3).wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or
receiving certain types of file attachments. Check your e-mail security settings
to determine how attachments are handled.

Villafana, Ann Marie C. (USAFLS)

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 12:08 PM
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Subject: Latest Version

Colleagues,

Attached please find the latest version of the government's response. I have added a new Section III, which details the efforts made by Marie in maintaining contact with T.M., C.W., and S.R.

Dexter



victim_resp_USA
rev corrected (...)

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 12:00 PM
To: Acosta, Alex (USAFLS); Lee, Dexter (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Subject: RE: Brad Edwards' End Game

I have talked to Brad and his heart seems to be in the right place, he just has gotten himself a bit too worked up over this. The agents and I (and Karen, I think) would be happy to meet with him and his clients. The problem is that there is nothing to discuss -- the agreement has already been signed and our investigation is closed. In light of that, I don't think a meeting would satisfy him because he seems to believe that his petition can undo what has been done.

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: Acosta, Alex (USAFLS)
Sent: Wednesday, July 09, 2008 11:56 AM
To: Lee, Dexter (USAFLS); Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Subject: Re: Brad Edwards' End Game

Not at all.

We need to file today.

----- Original Message -----

From: Lee, Dexter (USAFLS)
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Sent: Wed Jul 09 11:52:46 2008
Subject: Brad Edwards' End Game

Marie, Alex and Jeff,

I have just spoken with Kim Herd at EOUSA regarding clearance to argue that no rights to consultation accrue until after charges have been filed. The argument is being considered by Criminal Division and OLP. Kim wanted to know what Edwards' objective in this case is, and whether he would agree to meet and try to resolve this. I told Kim that the only way to avoid our filing at 5:00 p.m. today is if Edwards' agree to a joint enlargement of time.

How reasonable do you think Edwards is?

Dexter

Recipient

Acosta, Alex (USAFLS)
Lee, Dexter (USAFLS)
Sloman, Jeff (USAFLS)
Jacobus, Wendy (USAFLS)

Read

Read: 7/9/2008 12:01 PM
Read: 7/9/2008 12:01 PM
Read: 7/9/2008 12:00 PM
Read: 7/9/2008 12:12 PM

Villafana, Ann Marie C. (USAFLS)

From: Acosta, Alex (USAFLS)
Sent: Wednesday, July 09, 2008 11:56 AM
To: Lee, Dexter (USAFLS); Villafana, Ann Marie C. (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Subject: Re: Brad Edwards' End Game

Not at all.

We need to file today.

----- Original Message -----

From: Lee, Dexter (USAFLS)
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
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Dexter

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From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 11:53 AM
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS); Sloman, Jeff (USAFLS)
Cc: Jacobus, Wendy (USAFLS)
Subject: Brad Edwards' End Game

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How reasonable do you think Edwards is?

Dexter

Villafana, Ann Marie C. (USAFLS)

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 11:49 AM
To: Sloman, Jeff (USAFLS); Lee, Dexter (USAFLS); Acosta, Alex (USAFLS)
Cc: Atkinson, Karen (USAFLS); Jacobus, Wendy (USAFLS)
Subject: RE: Emailing: victim_resp_USArev corrected.wpd
Attachments: image001.png

Here is the language from the Agreement. I will leave it to you to interpret whether disclosing part of the substance of the Agreement requires sealing or otherwise.

The parties anticipate that this agreement will not be made public record. If the United States receives a Freedom of Information Act request or any compulsory process commanding the disclosure of the agreement, it will provide notice to Epstein before making disclosure.

A. Marie Villafana
Assistant U.S. Attorney
561 209-1047

-----Original Message-----

From: Sloman, Jeff (USAFLS)
Sent: Wednesday, July 09, 2008 9:57 AM
To: Lee, Dexter (USAFLS); Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS)
Cc: Atkinson, Karen (USAFLS); Jacobus, Wendy (USAFLS)
Subject: RE: Emailing: victim_resp_USArev corrected.wpd

Doesn't the confidentiality provision obligate us to file it under seal?

-----Original Message-----

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 9:53 AM
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS)
Cc: Atkinson, Karen (USAFLS); Sloman, Jeff (USAFLS); Jacobus, Wendy (USAFLS)
Subject: RE: Emailing: victim_resp_USArev corrected.wpd

Alex and Jeff,

Do you have any preference for filing under seal or a public filing? If we can protect the identities of the minor victims in a public filing, that is one less reason to file it under seal. The other considerations are the government's confirmation that Epstein was under federal investigation, and the confidentiality provision in the deferral of prosecution agreement with Epstein.

It's actually easier to file it electronically, and the general policy is that documents filed in court are public.

Dexter

-----Original Message-----

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 9:23 AM
To: Lee, Dexter (USAFLS); Acosta, Alex (USAFLS)
Cc: Atkinson, Karen (USAFLS); Sloman, Jeff (USAFLS); Jacobus, Wendy (USAFLS)
Subject: RE: Emailing: victim_resp_USArev corrected.wpd

I was planning to redact all of that information prior to scanning it and attaching Exhibit Stickers. I think we should do so even if this is filed under seal.

A. Marie Villafaña
Assistant U.S. Attorney
561 209-1047

-----Original Message-----

From: Lee, Dexter (USAFLS)
Sent: Wednesday, July 09, 2008 9:22 AM
To: Villafana, Ann Marie C. (USAFLS); Acosta, Alex (USAFLS)
Cc: Atkinson, Karen (USAFLS); Sloman, Jeff (USAFLS); Jacobus, Wendy (USAFLS)
Subject: RE: Emailing: victim_resp_USArev corrected.wpd

Marie,

I will sign the response. Since this case involves girls who were minors when the crimes were committed, and there is a confidentiality provision in the deferral of prosecution agreement with Epstein, I believe this should be filed under seal. Otherwise, we'll have to go through each letter and excise the names, addresses, and other identifying information on the three girls.

Dexter

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From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 9:11 AM
To: Lee, Dexter (USAFLS); Acosta, Alex (USAFLS)
Cc: Atkinson, Karen (USAFLS); Sloman, Jeff (USAFLS)
Subject: Emailing: victim_resp_USArev corrected.wpd

Dexter and Alex -- I fixed a couple of typos and entered the correct information about the dates when the letters were sent. I also included the information about all three of Edwards' clients, T.M., C.W., and S.R.

At the end, I also corrected the information regarding the notifications of the victims about the change of plea. I called Edwards on Friday, but I'm not sure whether we spoke that day or if he called me over the weekend. And the agents and I didn't start making calls together until Monday after the hearing. So I notified Edwards to inform his three clients, and PBPD tried to notify six victims, I think. I didn't want the court to think that we tried to notify all 33 girls.

I will make similar changes to my declaration and send that to you shortly.

Also, I notice there is no signature block. Do you want me to sign and file? Or will you do that, Dexter? Thanks.

The message is ready to be sent with the following file or link attachments:

victim_resp_USArev corrected.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Tracking:

Recipient

Sloman, Jeff (USAFLS)
Lee, Dexter (USAFLS)
Acosta, Alex (USAFLS)
Atkinson, Karen (USAFLS)
Jacobus, Wendy (USAFLS)

Read

Read: 7/9/2008 11:49 AM
Read: 7/9/2008 11:49 AM
Read: 7/9/2008 11:55 AM

Read: 7/9/2008 12:29 PM

Villafana, Ann Marie C. (USAFLS)

From: Acosta, Alex (USAFLS)
Sent: Wednesday, July 09, 2008 10:38 AM
To: Villafana, Ann Marie C. (USAFLS); Lee, Dexter (USAFLS)
Cc: Atkinson, Karen (USAFLS); Sloman, Jeff (USAFLS)
Subject: RE: Emailing: Villafana Declaration-v2 final.wpd

A few thoughts:

1. bottom of page 5/ top of page 6 -- were we talk about the "Throughout the negotiations, ... recompense." Should we cite to Decl para 8?
2. Next para -- cite to para 8 should be cite to para 10.
3. Right before the next para starting with On Friday, should we discuss the content of para 9, where the same attorney that now complains had an opportunity to communicate with our office and didn't. What I find particularly compelling about that point is that Edwards had, or should have had, knowledge of this agreement because his clients were told of the agreement previously. Cite para 8. In fact, maybe this should be a separate argument III -- he, or his clients, had prior knowledge and didn't complain until now. Thoughts?
4. In para 2 of the declaration, do we need the last sentence hitting the State Attorney?

-----Original Message-----

From: Villafana, Ann Marie C. (USAFLS)
Sent: Wednesday, July 09, 2008 9:22 AM
To: Acosta, Alex (USAFLS); Lee, Dexter (USAFLS)
Cc: Atkinson, Karen (USAFLS); Sloman, Jeff (USAFLS)
Subject: Emailing: Villafana Declaration-v2 final.wpd

Attached is the revised declaration. Please let me know if any other changes are required. I am off to Court but should be back by 11:30.

Thank you.

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Villafana Declaration-v2 final.wpd

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Dexter

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Assistant U.S. Attorney
561 209-1047

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victim_resp_USArev corrected.wpd

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Lee, Dexter (USAFLS)
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Read

Read: 7/9/2008 9:30 AM

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Cc: Atkinson, Karen (USAFLS); Sloman, Jeff (USAFLS)
Subject: Emailing: Villafana Declaration-v2 final.wpd
Attachments: Villafana Declaration-v2 final.wpd

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