



**Farmer, Jaffe, Weissing,
Edwards, Fistos & Lehrman, P.L.**

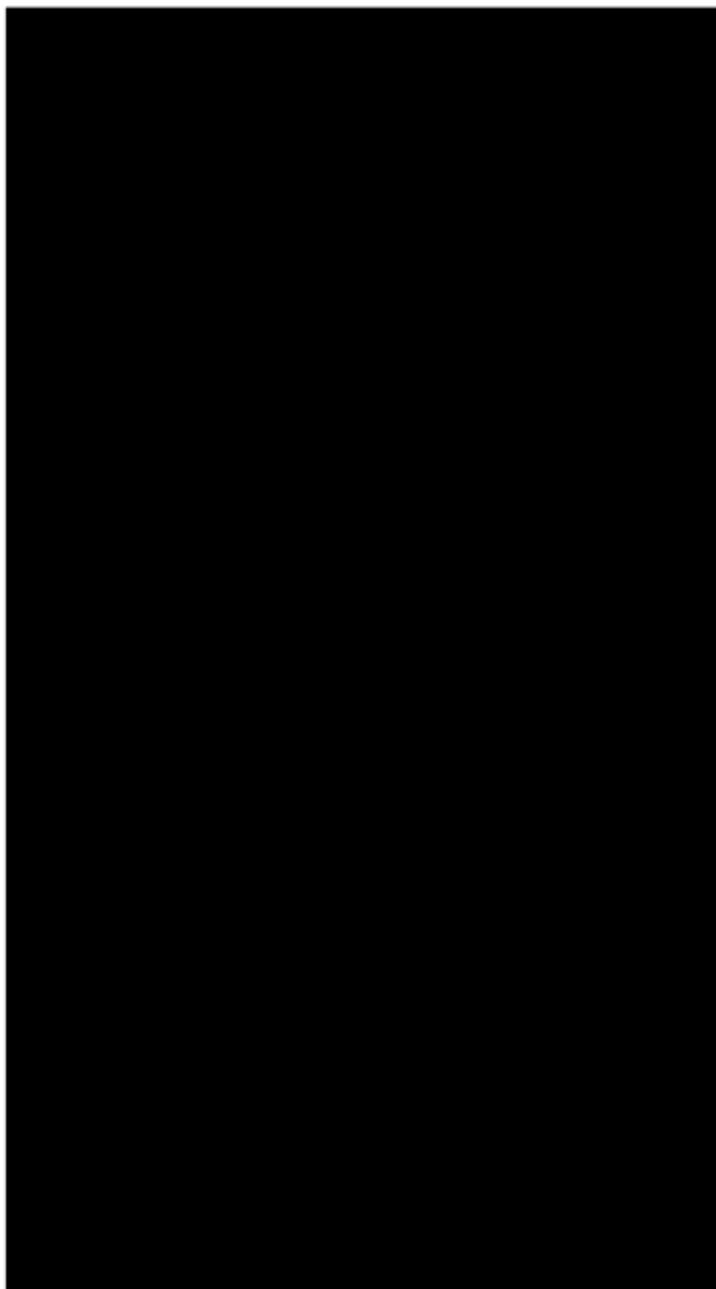
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CONFIDENTIAL

CONFIDENTIAL

CONFIDENTIAL IDENTITY OF PSEUDONYMS USED IN DISCOVERY REQUESTS



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2,

Plaintiffs

v.

UNITED STATES,

Defendants

JANE DOE #1 AND JANE DOE #2'S SUPPLEMENTAL REQUEST
FOR PRODUCTION TO THE GOVERNMENT REGARDING "VICTIM" STATUS

COME NOW Jane Doe #1 and Jane Doe #2 ("the victims), by and through undersigned counsel, and request the defendant United States (hereinafter "the Government") to produce within 30 days the original or best copy of the items listed herein below for inspection and/or copying, pursuant to the Court's Order (DE 99) directing discovery in this case, the Court's Order denying the Government's motion to dismiss and lifting stay of discovery (DE 189), the Court's Omnibus Order (DE 190), and the Court's Order Denying Motion to Join (DE 324):

BACKGROUND

As the Government will recall, it has previously suggested that it might argue that various persons are not "victims" protected by the Crime Victims' Rights Act (CVRA), 18 U.S.C. § 3771, in the above-captioned case. Accordingly, Jane Doe 1 and Jane Doe 2 propound the following supplemental discovery requests. They hope that the Government will voluntarily provide the requested information without need for intervention by the Court.

SUPPLEMENTAL DISCOVERY REQUESTS

The numbered discovery requests below should all be construed to provide the maximum possible information to Jane Doe 1 and Jane Doe 2 and in light of the definition of terms provided at the end of the requests. If there is no information covered by the request, please note that fact. If the request has multiple, letter subparts, please provide all information covered by each of the subparts:

Supplemental Discovery Request 1. Please provide all documents, correspondence, and other information in which the Government has treated and/or identified one or more of Jane Doe 1-33 as victims under (a) the CVRA, 18 U.S.C. § 3771; (b) 42 U.S.C. 10606-10608; (c) 18 U.S.C. § 2255; or (d) any other crime victim statute.

Supplement Discovery Request 2. The Non-Prosecution Agreement in this case contains a provision that provides immunity in the Southern District of Florida not only to Epstein, but also to “any potential co-conspirators of Epstein.” Please provide (a) all documents, correspondence, and other information pertaining to whether one or more of Jane Does 1 - 33 have been harmed by Jeffrey Epstein or any of his potential co-conspirators, including (but not limited to) any harm caused by acts of sexual abuse; (b) all documents, correspondence, or other information pertaining to whether one or more of the Jane Does 1-33 received immunity through the NPA as a “potential co-conspirator.”

Supplemental Discovery Request 3. Please provide all documents, correspondence, and other information, including any FBI 302's, pertaining to the Government's investigation of sexual abuse of Jane Does 1 - 33 by Jeffrey Epstein or providing evidence that he directly and proximately harmed them.

Supplemental Discovery Request 4. Please provide an unredacted copy of Jane Doe 3's FBI 302 pertaining to the 2011 interview in Australia of her in connection with sexual abuse by Jeffrey Epstein.

Supplemental Discovery Request 5. On about November 27, 2007, AUSA [REDACTED] sent a communication to counsel for Jeffrey Epstein that stated, in part, "Therefore, unless you provide me with a good faith objection to Judge Davis's selection [as special master for selecting legal counsel for victim pursuing claims against Epstein] by COB tomorrow, November 28, 2007, I will authorize the notification of the victims." Please provide all documents, correspondence, and other information regarding the "victims" for whom [REDACTED] was discussing authorizing notification.

Supplemental Discovery Request 6. On July 9, 2008, AUSA [REDACTED] stated in a sworn affidavit that: "Throughout the investigation, when a victim was identified, victim notification letters were provided to her both from your Affiant [i.e., [REDACTED]] and from the FBI's Victim-Witness specialist." Please provide all documents, correspondence, and other information that was used in the preparation of this answer and/or that supports its accuracy, including all documents, correspondence, and other information pertaining to how the victims were identified..

Supplemental Discovery Request 7. The Government may intend to argue that minor girls who recruited other minor girls for Epstein to sexually abuse were criminally involved in the abuse. Please provide all documents, correspondence, and other information that would indicate that the recruiting girls and/or Jane Doe 1 or Jane Doe 2:

- A. Were under the age of 18 at the time of the recruiting.
- B. Were sexually abused at least once before beginning any recruiting.

C. Were threatened in any way at any time by Epstein or his potential co-conspirators.

D. Were otherwise not criminally culpable for the abuse Jeffrey Epstein committed against them or other minor girls.

E. Were coerced or enticed by Epstein into recruiting for him.

Supplemental Discovery Request 8. Please provide all documents, correspondence, and other information that the Government relies upon (or will rely upon) to advance any claim that the Jane Does 1 – 33 are not “victims” under the CVRA in the above-captioned case.

Supplemental Discovery Request 9. Please provide all documents, correspondence, and other information, including all victim notification letters, that the Government provided to Jane Does 1 - 33 pertaining to: (a) their rights under the CVRA, 18 U.S.C. § 3771; (b) their rights under 42 U.S.C. §§ 10606-08; (c) their rights under 18 U.S.C. § 2255; (d) any other statute related to crime victims’ rights; and (e) their rights under the non-prosecution agreement entered into with Jeffrey Epstein.

Supplemental Discovery Request 10. Please provide all documents, correspondence, and other information, including all FBI 302s, regarding all meetings with Government agents (including FBI agents) with Jane Does 1 - 33 or other victims pertaining to the non-prosecution agreement entered into with Jeffrey Epstein.

Supplemental Discovery Request 11. If the Government intends to argue that any of the Jane Does are not “victims” because they were participating co-conspirators, please provide all documents, correspondence, and other information: (a) identifying all individuals who the Government recognized or recognizes as a “co-conspirators” of Jeffrey Epstein; (b) regarding any immunity any of the Jane Does received as a result of the NPA; (c) indicating that the

immunity of the Jane Does as co-conspirators was contingent upon Jeffrey Epstein's performance of the conditions of the NPA.

DEFINITIONS

For the purpose of construing the foregoing discovery requests, the following terms are defined:

The term "documents" means and includes, without limitation, all writings of any kind, including the originals and all non-identical copies or drafts, whether different from the original by reason of any notation made on such copy or draft or otherwise including, without limitation, correspondence, memoranda, notes, diaries, statistics, letters, e-mails, electronic computer files, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, interoffice communications, reports of interviews, FBI 302's, offers, notations of any sort of conversation, telephone calls, meetings or other communications, bulletins, printed matter, computer print-outs, teletypes, facsimiles, invoices, work sheets, flight logs, flight manifests, and all drafts, alterations, modifications, changes, and amendments of any of the foregoing, graphic or aural writs, records or representations of any kind including, without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings, motion pictures; and electronic, mechanical or electric records or representations of any kind including, without limitation, tapes, cassettes and disc recordings, and writings and printed material of every kind.

The term "correspondence" means any tangible object that conveys information or memorializes information that was conveyed in tangible or oral form including, but not limited to, writings, letters, memoranda, reports, notes, e-mails, telephone logs, telephone billing information, telephone recordings, and interoffice communications.

The term "victim" means any person that the Government identified as a possible victim of a sex offense committed by Jeffrey Epstein, including Jane Doe 1, 2, 3, and 4, all victims identified in attachment to the non-prosecution agreement entered into by Epstein, and any other person that the Government investigated as a possible victim of Epstein's sex offenses.

The term "Government" means the federal government, including all employees of and components of the United States Department of Justice (such as, the Office of the Attorney General, the Office of the Deputy Attorney General, the Criminal Divisions, the Office of Professional Responsibility, the Child Exploitation and Obscenity Section, the U.S. Attorney's Offices for the Southern District and Middle District of Florida, New Mexico, the Virgin Islands, and the Southern District of New York, and the Federal Bureau of Investigation) and other federal government agencies with law enforcement responsibilities related to the Epstein case (such as the Internal Revenue Service). This request for production seeks all documents, correspondence, and other information held by all of these entities, including all employees of and components of the Justice Department that worked on or were in any way involved the Epstein investigation and/or that possess information relevant to the victims' claims. For purposes of the request for production of flight logs and related travel information, this request

includes the Federal Aviation Administration and Bureau of Immigrations and Customs Enforcement.

The term "including" means containing within the request, but not limiting the request.

The term "witness statement" means any document or other recording in any form (including oral form) reflecting, recording, or otherwise memorializing a statement made or information conveyed by a potential witness, including for example FBI 302's. The term includes information collected by any law enforcement, prosecuting or government agency, including all federal, state, and local law enforcement agencies located in Washington, D.C., or Florida.

PRIVILEGE LOG

If you believe that any document, correspondence, or other information requested in this request is subject to a privilege and if you intend to assert that privilege, please provide a "privilege log" consistent with Local Rule 26.1(g), including a description a document that is consistent with Local Rule 26.1(g)(3)(B). Your privilege log should include the type of document, general subject matter of the document, date of the document, and author and addressee of the document or correspondence.

REDUCING ANY UNDUE BURDEN

If you believe that complying with any of the foregoing requests would be unduly burdensome, please contact victims' counsel – [REDACTED] – to discuss ways to reduce any such burden.

DATED: December 2, 2015

Respectfully Submitted,

[REDACTED]

FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301

[REDACTED]

and

[REDACTED]

Pro Hac Vice

S.J. Quinney College of Law at the
University of Utah*
332 S. 1400 E.
Salt Lake City, UT 84112



Attorneys for Jane Doe 1, 2, 3 and 4

CERTIFICATE OF SERVICE

The foregoing document was served on December 2, 2015, on the following via US Mail and E-Mail Transmission:



Assistant U.S. Attorneys
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401



Attorneys for the Government

Respectfully Submitted,



FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.

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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE 1 and JANE DOE 2,

Plaintiffs

vs.

UNITED STATES,

Defendant

**JANE DOE 1 AND JANE DOE 2'S THIRD REQUEST FOR ADMISSIONS
TO THE GOVERNMENT REGARDING QUESTIONS RELEVANT TO "VICTIM"
STATUS UNDER THE CRIME VICTIMS RIGHTS ACT**

COME NOW Jane Doe 1 and Jane Doe 2 ("the victims), by and through undersigned counsel, and request the defendant United States (hereinafter "the Government") to admit or deny the following facts in not later than 30 days:

BACKGROUND

As the Government will recall, it has previously stipulated that Jane Doe 1 and Jane Doe 2 were "victims" under the Crime Victims' Rights Act (CVRA) for purpose of the above-captioned case. Recently, however, it appears that the Government may be attempting to retreat from this long-established position with regard to them. The Government may also take a similar position with regard to other young women who may wish to participate in this case. Accordingly, Jane Doe 1 and Jane Doe 2 seek the following discovery to confirm their "victim" status and that of other similarly-situated persons.

DISCOVERY REQUESTED

The numbered requests for admissions below should all be construed in light of the definitions of terms provided at the end of the requests. Where the request for admission has separate, lettered sub-parts, please admit or deny each separate sub-part. If denied, please explain the legal basis and support for your denial.

1. A federal crime of sexual abuse directly and proximately harms the person who has been sexually abused.
2. Between 1999 and September 2007, the following persons were directly and proximately harmed by acts of sexual abuse by Jeffrey Epstein in the Southern District of Florida while they were under the age of 18:
 - A. Jane Doe 1.
 - B. Jane Doe 2.
 - C. Jane Doe 3.
 - D. Jane Doe 4.
 - E. Jane Doe 5.
 - F. Jane Doe 6.
 - G. Jane Doe 7.
 - H. Jane Doe 8.
 - I. Jane Doe 9.
 - J. Jane Doe 10.
 - K. Jane Doe 11.
 - L. Jane Doe 12.
 - M. Jane Doe 13.
 - N. Jane Doe 14.
 - O. Jane Doe 15.
 - P. Jane Doe 16.
 - Q. Jane Doe 17.
 - R. Jane Doe 18.
 - S. Jane Doe 19.
 - T. Jane Doe 20.
 - U. Jane Doe 21.
 - █. Jane Doe 22.
 - W. Jane Doe 23.
 - X. Jane Doe 24.
 - Y. Jane Doe 25.
 - Z. Jane Doe 26.
 - AA. Jane Doe 27.
 - BB. Jane Doe 28.
 - CC. Jane Doe 29.
 - DD. Jane Doe 30.
 - EE. Jane Doe 31.
 - FF. Jane Doe 32.

GG. Jane Doe 33.

3. Between 2005 and 2008, the Government sent notices, directly or indirectly, to the following person telling her that she was a "victim" or "possible victim" of a federal crime of sexual abuse committed by Epstein:

A. Jane Doe 1.
B. Jane Doe 2.
C. Jane Doe 3.
D. Jane Doe 4.
E. Jane Doe 5.
F. Jane Doe 6.
G. Jane Doe 7.
H. Jane Doe 8.
I. Jane Doe 9.
J. Jane Doe 10.
K. Jane Doe 11.
L. Jane Doe 12.
M. Jane Doe 13.
N. Jane Doe 14.
O. Jane Doe 15.
P. Jane Doe 16.
Q. Jane Doe 17.
R. Jane Doe 18.
S. Jane Doe 19.
T. Jane Doe 20.
U. Jane Doe 21.
■ Jane Doe 22.
W. Jane Doe 23.
X. Jane Doe 24.
Y. Jane Doe 25.
Z. Jane Doe 26.
AA. Jane Doe 27.
BB. Jane Doe 28.
CC. Jane Doe 29.
DD. Jane Doe 30.
EE. Jane Doe 31.
FF. Jane Doe 32.
GG. Jane Doe 33.

4. The Government possesses evidence that the following persons were sexually abused or had sexual contact with Jeffrey Epstein in the Southern District of Florida when under the age of 18:

A. Jane Doe 1.
B. Jane Doe 2.

- C. Jane Doe 3.
- D. Jane Doe 4.
- E. Jane Doe 5.
- F. Jane Doe 6.
- G. Jane Doe 7.
- H. Jane Doe 8.
- I. Jane Doe 9.
- J. Jane Doe 10.
- K. Jane Doe 11.
- L. Jane Doe 12.
- M. Jane Doe 13.
- N. Jane Doe 14.
- O. Jane Doe 15.
- P. Jane Doe 16.
- Q. Jane Doe 17.
- R. Jane Doe 18.
- S. Jane Doe 19.
- T. Jane Doe 20.
- U. Jane Doe 21.
- Jane Doe 22.
- W. Jane Doe 23.
- X. Jane Doe 24.
- Y. Jane Doe 25.
- Z. Jane Doe 26.
- AA. Jane Doe 27.
- BB. Jane Doe 28.
- CC. Jane Doe 29.
- DD. Jane Doe 30.
- EE. Jane Doe 31.
- FF. Jane Doe 32.
- GG. Jane Doe 33.

- 5. In about 2007 and 2008, the Government provided a list of approximately 34 “confirmed minor” victims of Jeffrey Epstein’s sexual abuse to Jeffrey Epstein’s legal counsel.
- 6. On the Government’s list of “confirmed” minor victims of Epstein’s sexual abuse were:
 - A. Jane Doe 1.
 - B. Jane Doe 2.
 - C. Jane Doe 3.
 - D. Jane Doe 4.
 - E. Jane Doe 5.
 - F. Jane Doe 6.
 - G. Jane Doe 7.
 - H. Jane Doe 8.
 - I. Jane Doe 9.
 - J. Jane Doe 10.

K. Jane Doe 11.
L. Jane Doe 12.
M. Jane Doe 13.
N. Jane Doe 14.
O. Jane Doe 15.
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AA. Jane Doe 27.
BB. Jane Doe 28.
CC. Jane Doe 29.
DD. Jane Doe 30.
EE. Jane Doe 31.
FF. Jane Doe 32.
GG. Jane Doe 33.

7. On about September 23, 2007, the Government sent an email to defense counsel for Jeffrey Epstein that
- A. Stated: “[i]t is factually accurate that the list we are going to give you are persons we have identified as victims. If we did not think they were victims, they would have no right to bring suit.”
 - B. Used the term “victims” to refer to persons who were identified “victims” of federal sex offense committed by Jeffrey Epstein.
8. On or about September 23, 2007, among the persons that the Government had “identified as victims” (as noted in the previous question) were:
- A. Jane Doe 1.
 - B. Jane Doe 2.
 - C. Jane Doe 3.
 - D. Jane Doe 4.
 - E. Jane Doe 5.
 - F. Jane Doe 6.
 - G. Jane Doe 7.
 - H. Jane Doe 8.
 - I. Jane Doe 9.
 - J. Jane Doe 10.
 - K. Jane Doe 11.
 - L. Jane Doe 12.

- M. Jane Doe 13.
- N. Jane Doe 14.
- O. Jane Doe 15.
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- U. Jane Doe 21.
- V. Jane Doe 22.
- W. Jane Doe 23.
- X. Jane Doe 24.
- Y. Jane Doe 25.
- Z. Jane Doe 26.
- AA. Jane Doe 27.
- BB. Jane Doe 28.
- CC. Jane Doe 29.
- DD. Jane Doe 30.
- EE. Jane Doe 31.
- FF. Jane Doe 32.
- GG. Jane Doe 33.

9. On or about September 24, 2007, the Government asked [REDACTED] to run a "conflicts check" on persons who the Government believed were "minor victims" of sex offenses by Jeffrey Epstein that included:

- A. Jane Doe 1.
- B. Jane Doe 2.
- C. Jane Doe 3.
- D. Jane Doe 4.
- E. Jane Doe 5.
- F. Jane Doe 6.
- G. Jane Doe 7.
- H. Jane Doe 8.
- I. Jane Doe 9.
- J. Jane Doe 10.
- K. Jane Doe 11.
- L. Jane Doe 12.
- M. Jane Doe 13.
- N. Jane Doe 14.
- O. Jane Doe 15.
- P. Jane Doe 16.
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- T. Jane Doe 20.
- U. Jane Doe 21.

- . Jane Doe 22.
- W. Jane Doe 23.
- X. Jane Doe 24.
- Y. Jane Doe 25.
- Z. Jane Doe 26.
- AA. Jane Doe 27.
- BB. Jane Doe 28.
- CC. Jane Doe 29.
- DD. Jane Doe 30.
- EE. Jane Doe 31.
- FF. Jane Doe 32.
- GG. Jane Doe 33.

10. On about October 3, 2007, the Government sent a proposed letter that would have gone to a special master for selecting an attorney representation for the victims under NPA's compensation procedure" that stated: "Based upon the investigation, the United States has identified 40 young women who can be characterized as victims pursuant to 18 U.S.C. § 2255."

11. In this case, the Government currently considers the following as victims of Jeffrey Epstein:

- A. Jane Doe 1.
- B. Jane Doe 2.
- C. Jane Doe 3.
- D. Jane Doe 4.
- E. Jane Doe 5.
- F. Jane Doe 6.
- G. Jane Doe 7.
- H. Jane Doe 8.
- I. Jane Doe 9.
- J. Jane Doe 10.
- K. Jane Doe 11.
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- X. Jane Doe 24.
- Y. Jane Doe 25.

Z. Jane Doe 26.
AA. Jane Doe 27.
BB. Jane Doe 28.
CC. Jane Doe 29.
DD. Jane Doe 30.
EE. Jane Doe 31.
FF. Jane Doe 32.
GG. Jane Doe 33.

12. In and around October 3, 2007, the Government had identified the following persons who could be characterized as victims pursuant to 18 U.S.C. § 2255:

A. Jane Doe 1.
B. Jane Doe 2.
C. Jane Doe 3.
D. Jane Doe 4.
E. Jane Doe 5.
F. Jane Doe 6.
G. Jane Doe 7.
H. Jane Doe 8.
I. Jane Doe 9.
J. Jane Doe 10.
K. Jane Doe 11.
L. Jane Doe 12.
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AA. Jane Doe 27.
BB. Jane Doe 28.
CC. Jane Doe 29.
DD. Jane Doe 30.
EE. Jane Doe 31.
FF. Jane Doe 32.
GG. Jane Doe 33.

13. On about November 27, 2007, AUSA ██████████ sent a communication to counsel for Jeffrey Epstein that stated, in part, "Therefore, unless you provide me with a good faith objection to Judge Davis's selection [as special master for selecting legal counsel for victim pursuing claims against Epstein] by COB tomorrow, November 28, 2007, I will authorize the notification of the victims."
14. The "victims" referred to in the email quoted in the previous question included:
- A. Jane Doe 1.
 - B. Jane Doe 2.
 - C. Jane Doe 3.
 - D. Jane Doe 4.
 - E. Jane Doe 5.
 - F. Jane Doe 6.
 - G. Jane Doe 7.
 - H. Jane Doe 8.
 - I. Jane Doe 9.
 - J. Jane Doe 10.
 - K. Jane Doe 11.
 - L. Jane Doe 12.
 - M. Jane Doe 13.
 - N. Jane Doe 14.
 - O. Jane Doe 15.
 - P. Jane Doe 16.
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 - U. Jane Doe 21.
 - ██████. Jane Doe 22.
 - W. Jane Doe 23.
 - X. Jane Doe 24.
 - Y. Jane Doe 25.
 - Z. Jane Doe 26.
 - AA. Jane Doe 27.
 - BB. Jane Doe 28.
 - CC. Jane Doe 29.
 - DD. Jane Doe 30.
 - EE. Jane Doe 31.
 - FF. Jane Doe 32.
 - GG. Jane Doe 33.
15. On about December 6, 2007, AUSA Jeffrey Sloman sent a communication to Epstein's legal counsel that stated "[t]he victims identified through the federal investigation should be appropriately informed"

16. The “victims” referred to in the email quoted in the previous question included:

- A. Jane Doe 1.
- B. Jane Doe 2.
- C. Jane Doe 3.
- D. Jane Doe 4.
- E. Jane Doe 5.
- F. Jane Doe 6.
- G. Jane Doe 7.
- H. Jane Doe 8.
- I. Jane Doe 9.
- J. Jane Doe 10.
- K. Jane Doe 11.
- L. Jane Doe 12.
- M. Jane Doe 13.
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- Y. Jane Doe 25.
- Z. Jane Doe 26.
- AA. Jane Doe 27.
- BB. Jane Doe 28.
- CC. Jane Doe 29.
- DD. Jane Doe 30.
- EE. Jane Doe 31.
- FF. Jane Doe 32.
- GG. Jane Doe 33.

17. In or about the summer of 2008, the Government sent letters to the following persons advising them that they could obtain compensation from Jeffrey Epstein pursuant to a non-prosecution agreement entered into with Jeffrey Epstein:

- A. Jane Doe 1.
- B. Jane Doe 2.
- C. Jane Doe 3.
- D. Jane Doe 4.
- E. Jane Doe 5.
- F. Jane Doe 6.
- G. Jane Doe 7.
- H. Jane Doe 8.

- I. Jane Doe 9.
- J. Jane Doe 10.
- K. Jane Doe 11.
- L. Jane Doe 12.
- M. Jane Doe 13.
- N. Jane Doe 14.
- O. Jane Doe 15.
- P. Jane Doe 16.
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- Y. Jane Doe 25.
- Z. Jane Doe 26.
- AA. Jane Doe 27.
- BB. Jane Doe 28.
- CC. Jane Doe 29.
- DD. Jane Doe 30.
- EE. Jane Doe 31.
- FF. Jane Doe 32.
- GG. Jane Doe 33.

- 18. Throughout the investigation of Jeffrey Epstein, when a victim under the CVRA was identified, the Government provided victim notification letters to the victim, both from AUSA █ and from the FBI's Victim-Witness Specialist.
- 19. Under the non-prosecution agreement that the Government agreed to with Epstein, the sentence that provided that "Any person, who while a minor, was victim of a violation of an offense enumerated in Title 18, United States Code, Section 2255, will have the same rights to proceed under Section 2255 as she would have had, if Mr. Epstein had been tried federally and convicted of an enumerated offense" covered:
 - A. Jane Doe 1.
 - B. Jane Doe 2.
 - C. Jane Doe 3.
 - D. Jane Doe 4.
 - E. Jane Doe 5.
 - F. Jane Doe 6.
 - G. Jane Doe 7.
 - H. Jane Doe 8.
 - I. Jane Doe 9.
 - J. Jane Doe 10.
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AA. Jane Doe 27.
BB. Jane Doe 28.
CC. Jane Doe 29.
DD. Jane Doe 30.
EE. Jane Doe 31.
FF. Jane Doe 32.
GG. Jane Doe 33.

20. The Government has never publicly accused the following persons of a crime:

A. Jane Doe 1.
B. Jane Doe 2.
C. Jane Doe 3.
D. Jane Doe 4.
E. Jane Doe 5.
F. Jane Doe 6.
G. Jane Doe 7.
H. Jane Doe 8.
I. Jane Doe 9.
J. Jane Doe 10.
K. Jane Doe 11.
L. Jane Doe 12.
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AA. Jane Doe 27.
BB. Jane Doe 28.
CC. Jane Doe 29.
DD. Jane Doe 30.
EE. Jane Doe 31.
FF. Jane Doe 32.
GG. Jane Doe 33.

21. The Government does not ordinarily treat juveniles who have been sexually abused by an adult as criminally involved in their own sexual abuse.
22. The Government has never treated a juvenile who have been sexually abused by an adult as criminally involved in her own sexual abuse.
23. The Government has never formally investigated the following persons for having committed a federal crime:
 - A. Jane Doe 1.
 - B. Jane Doe 2.
 - C. Jane Doe 3.
 - D. Jane Doe 4.
 - E. Jane Doe 5.
 - F. Jane Doe 6.
 - G. Jane Doe 7.
 - H. Jane Doe 8.
 - I. Jane Doe 9.
 - J. Jane Doe 10.
 - K. Jane Doe 11.
 - L. Jane Doe 12.
 - M. Jane Doe 13.
 - N. Jane Doe 14.
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 - T. Jane Doe 20.
 - U. Jane Doe 21.
 - █. Jane Doe 22.
 - W. Jane Doe 23.
 - X. Jane Doe 24.
 - Y. Jane Doe 25.
 - Z. Jane Doe 26.

- AA. Jane Doe 27.
- BB. Jane Doe 28.
- CC. Jane Doe 29.
- DD. Jane Doe 30.
- EE. Jane Doe 31.
- FF. Jane Doe 32.
- GG. Jane Doe 33.

24. Under the Federal Juvenile Delinquency Act ("FJDA"), 18 U.S.C. § 5031 et seq., any person who was under the age of 18 who was sexually abused by Jeffrey Epstein could not have committed a federal crime (as opposed to an act of delinquency) associated with that sexual abuse.

25. The first time Jeffrey Epstein sexually abused the following persons while they were minors, they were not criminally involved in their own sexual abuse:

- A. Jane Doe 1.
- B. Jane Doe 2.
- C. Jane Doe 3.
- D. Jane Doe 4.
- E. Jane Doe 5.
- F. Jane Doe 6.
- G. Jane Doe 7.
- H. Jane Doe 8.
- I. Jane Doe 9.
- J. Jane Doe 10.
- K. Jane Doe 11.
- L. Jane Doe 12.
- M. Jane Doe 13.
- N. Jane Doe 14.
- O. Jane Doe 15.
- P. Jane Doe 16.
- Q. Jane Doe 17.
- R. Jane Doe 18.
- S. Jane Doe 19.
- T. Jane Doe 20.
- U. Jane Doe 21.
- V. Jane Doe 22.
- W. Jane Doe 23.
- X. Jane Doe 24.
- Y. Jane Doe 25.
- Z. Jane Doe 26.
- AA. Jane Doe 27.
- BB. Jane Doe 28.
- CC. Jane Doe 29.
- DD. Jane Doe 30.
- EE. Jane Doe 31.

FF. Jane Doe 32.
GG. Jane Doe 33.

26. In light of the Court's rulings in the above-captioned case, the following persons are "victims" within the meaning of the CVRA:

A. A. Jane Doe 1.
B. Jane Doe 2.
C. Jane Doe 3.
D. Jane Doe 4.
E. Jane Doe 5.
F. Jane Doe 6.
G. Jane Doe 7.
H. Jane Doe 8.
I. Jane Doe 9.
J. Jane Doe 10.
K. Jane Doe 11.
L. Jane Doe 12.
M. Jane Doe 13.
N. Jane Doe 14.
O. Jane Doe 15.
P. Jane Doe 16.
Q. Jane Doe 17.
R. Jane Doe 18.
S. Jane Doe 19.
T. Jane Doe 20.
U. Jane Doe 21.
■ Jane Doe 22.
W. Jane Doe 23.
X. Jane Doe 24.
Y. Jane Doe 25.
Z. Jane Doe 26.
AA. Jane Doe 27.
BB. Jane Doe 28.
CC. Jane Doe 29.
DD. Jane Doe 30.
EE. Jane Doe 31.
FF. Jane Doe 32.
GG. Jane Doe 33.

DEFINITIONS

For the purpose of construing the foregoing discovery requests, the following terms are defined:

The term "documents" or "communications" means and includes, without limitation, all writings of any kind, including the originals and all non-identical copies or drafts, whether

different from the original by reason of any notation made on such copy or draft or otherwise including, without limitation, correspondence, memoranda, notes, diaries, statistics, letters, e-mails, electronic computer files, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, interoffice communications, offers, notations of any sort of conversation, telephone calls, meetings or other communications, bulletins, printed matter, computer print-outs, teletypes, facsimiles, invoices, work sheets and all drafts, alterations, modifications, changes, and amendments of any of the foregoing, graphic or aural writs, records or representations of any kind including, without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings, motion pictures; and electronic, mechanical or electric records or representations of any kind including, without limitation, tapes, cassettes and disc recordings, and writings and printed material of every kind.

The term "correspondence" means any tangible object that conveys information or memorializes information that was conveyed in tangible or oral form including, but not limited to, writings, letters, memoranda, reports, notes, e-mails, telephone logs, telephone billing information, telephone recordings, and interoffice communications.

The term "victims" means any person that the Government identified as a possible victim of a sex offense committed by Jeffrey Epstein, including Jane Doe 1, 2, 3, and 4, and all victims identified in attachment to the non-prosecution agreement entered into by Epstein, and another person that the Government investigated as a possible victim of Epstein's sex offenses.

The term "Government" means the federal government, including all employees of and components of the United States Department of Justice (such as, the Office of the Attorney General, the Office of the Deputy Attorney General, the Criminal Divisions, the Office of Professional Responsibility, the Child Exploitation and Obscenity Section, the U.S. Attorney's Offices for the Southern District and Middle District of Florida, the Southern District of New York, the District of New Mexico, and the District of the U.S. Virgin Islands, and the Federal Bureau of Investigation), the Federal Aviation Administration, the Bureau of Immigration and Customs Enforcement, and any other federal government agencies with law enforcement responsibilities related to the Epstein case (such as the Internal Revenue Service). This request for production seeks all documents, correspondence, and other information held by all of these entities, including all employees of and components of the Justice Department that worked on or were in any way involved the Epstein investigation and/or that possess information relevant to the victims' claims.

The term "including" means containing within the request, but not limiting the request.

PRIVILEGE LOG

If you believe that any request for admission is subject to a privilege and if you intend to assert that privilege, please provide a "privilege log" consistent with Local Rule 26.1(g), including a description a document that is consistent with Local Rule 26.1(g)(3)(B). Your privilege log should include a specific identification of the privilege being asserted and the basis for the privilege.

DATED: December 2, 2015

Respectfully Submitted,

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Attorneys for Jane Does 1, 2, 3 and 4

CERTIFICATE OF SERVICE

The foregoing document was served on December 2, 2015, on the following via US Mail and E-Mail Transmission:

[REDACTED]

Assistant U.S. Attorneys
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[REDACTED]

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

Attorneys for the Government

Respectfully Submitted,



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