



U.S. Department of Justice

United States Attorney
Southern District of Florida

500 S. Australian Avenue, Suite 400
West Palm Beach, FL 33401

July 5, 2016

WELLS FARGO WACHOVIA
Subpoena Compliance
1201 Hays Street
Tallahassee, FL

RE: Trial Subpoena for Case No. 15-80222-CR-MARRA(s)
Certification of Subpoenaed Records

Dear Sir or Madam:

As you are aware, quite often, production of records by a records custodian of a corporation or bank is frequently followed by the necessity of having that or another designated records custodian testify at a jury trial some time later. This was necessary in order to lawfully enter the subpoenaed documents into evidence.

Recent changes in federal evidence law now permit us to obtain "certifications" such as the one attached hereto, in place of live testimony. When permitted by the court, these "certifications" could obviate the need for a witness at a trial.

With that in mind, please complete the "Certification of Domestic Records of Regularly Conducted Activity" attached and include it in your subpoena response. Should you have any questions regarding the form or anything else regarding the subpoena, please feel free to contact the agent at the number indicated in the subpoena, or if you prefer, contact me directly.

Sincerely,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

By:

Assistant United States Attorney
500 South Australian Avenue,
Suite 400
West Palm Beach, Florida 33401
Office
Fax:

**CERTIFICATION OF DOMESTIC RECORDS
OF REGULARLY CONDUCTED ACTIVITY
Pursuant to Fed. R. Evidence 902(11)**

The undersigned declarant hereby declares, certifies, verifies or states the following:

1. This certification concerns the regularly conducted business activity of the business named below.
2. The declarant is a records custodian or other qualified person who can provide a written declaration regarding the records of the regularly conducted business activity which are the subject of this certification.
3. The records of regularly conducted business activity (hereinafter "records") which are the subject of this certification accompany or are attached to this certification.
4. The records are originals or duplicate copies of domestic (United States) business records;
5. The records were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;
6. The records were kept in the course of a regularly conducted business activity; and
7. The records were made by the business activity as a regular practice.

I hereby declare, certify, verify or state, under penalty of perjury, that the foregoing is true and correct.

Signature

Name

Title

Name and address of business

Date of Declaration/Execution

[REDACTED]

From: Brad Edwards <[REDACTED]>
Sent: Thursday, June 16, 2016 1:06 PM
To: [REDACTED] (USAFLS)
Subject: Epstein victim list

[REDACTED]

I can't put my finger on the actual document listing the victims, but I found in an email a typed list that I believe was derived from that document. For now, it is the best I can find, although if I remember the number of identified victims was 34, so it appears this list is one short for some reason.

[REDACTED]



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

Brad Edwards
Board Certified Trial Attorney

425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301



[Redacted]

To: [Redacted]
Subject: FW: Epstein victim list

From: Brad Edwards [mailto:[Redacted]]
Sent: Thursday, June 16, 2016 1:06 PM
To: [Redacted]
Subject: Epstein victim list

[Redacted]

I can't put my finger on the actual document listing the victims, but I found in an email a typed list that I believe was derived from that document. For now, it is the best I can find, although if I remember the number of identified victims was 34, so it appears this list is one short for some reason.

Doc

[Large redacted area]



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

**Brad Edwards
Board Certified Trial Attorney**

425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301





U.S. Department of Justice

United States Attorney
Southern District of Florida

FILE COPY

500 South Australian Ave., Suite 400
West Palm Beach, FL 33401

Facsimile: [REDACTED]

July 10, 2008

NOTIFICATION OF IDENTIFIED VICTIMS

NOTICE: IN ACCORDANCE WITH TITLE 18, UNITED STATES CODE, SECTION 3509(d) AND FLORIDA LAW, THE ATTACHED DOCUMENT IS TO BE TREATED AS CONFIDENTIAL AND SHALL NOT BE DISCLOSED EXCEPT IN CONNECTION WITH A LEGAL PROCEEDING.

EFTA00184179



U.S. Department of Justice

United States Attorney
Southern District of Florida

500 South Australian Ave., Suite 400
West Palm Beach, FL 33401

Facsimile: [REDACTED]

July 10, 2008

VIA CERTIFIED MAIL

Jack A. Goldberger, Esq.
Atterbury, Goldberger & Weiss, P.A.
One Clearlake Centre, Suite 1400
250 Australian Ave S.
West Palm Beach, FL 33401-5015

Re: Jeffrey Epstein

Dear Mr. Goldberger:

FINAL NOTIFICATION OF IDENTIFIED VICTIMS

On June 30, 2008, Jeffrey Epstein (hereinafter referred to as "Epstein") entered a plea of guilty to violations of Florida Statutes Sections 796.07 (felony solicitation of prostitution) and 796.03 (procurement of minors to engage in prostitution), in the 15th Judicial Circuit in and for Palm Beach County (Case Nos. 2006-cf-009454AXXMB and 2008-cf-009381AXXMB) and was sentenced to a term of twelve months' imprisonment to be followed by an additional six months' imprisonment, followed by twelve months of Community Control 1, with conditions of community confinement imposed by the Court.

In light of the entry of the guilty plea and sentence, the United States has agreed to defer federal prosecution in favor of this state plea and sentence, subject to certain conditions.

One such condition to which Epstein has agreed is the following:

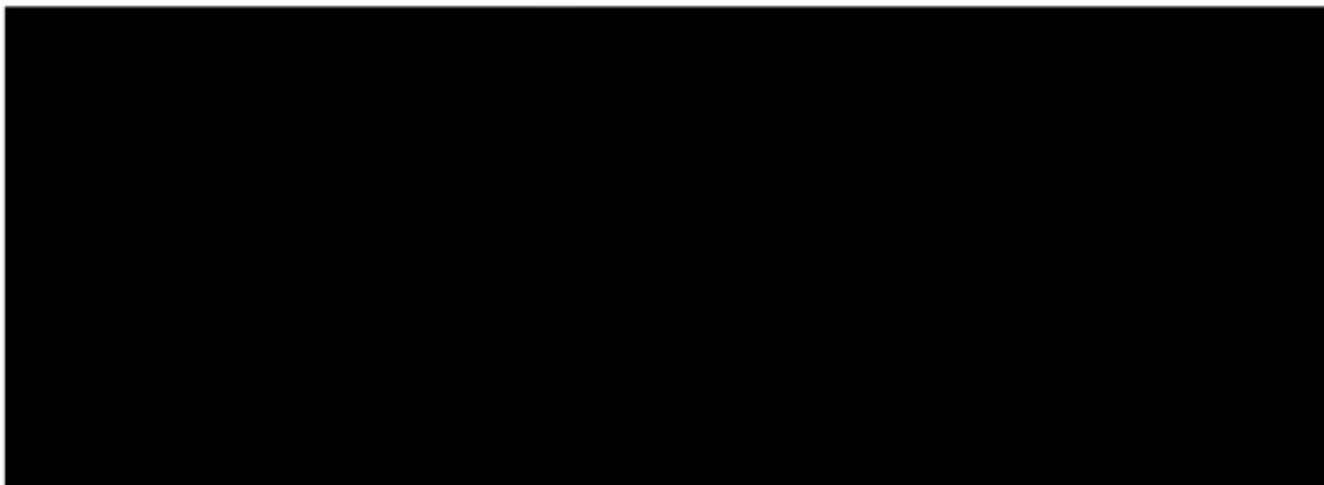
"Any person, who while a minor, was a victim of a violation of an offense enumerated in Title 18, United States Code, Section 2255, will have the same rights to proceed under Section 2255 as she would have had, if Mr. Epstein had been tried federally and convicted of an enumerated offense. For purposes

JACK GOLDBERGER, ESQ.
JULY 10, 2008
PAGE 2 OF 2

of implementing this paragraph, the United States shall provide Mr. Epstein's attorneys with a list of individuals whom it was prepared to name in an Indictment as victims of an enumerated offense by Mr. Epstein. Any judicial authority interpreting this provision, including any authority determining which evidentiary burdens if any a plaintiff must meet, shall consider that it is the intent of the parties to place these identified victims in the same position as they would have been had Mr. Epstein been convicted at trial. No more; no less."

Through this letter, this Office hereby provides Notice that the individuals identified below are individuals whom the United States was prepared to name as victims of an enumerated offense.

Identified Individuals



Sincerely, {

R. Alexander Acosta
United States Attorney

By:



Assistant United States Attorney

cc:

, AUSA