

LAW OFFICES

**LYONS AND SANDERS**

CHARTERED

DALE R. SANDERS \*  
BRUCE M. LYONS \*\*  
HOWARD L. GREITZER

EDWARD D. BERGER  
(1959-1987)

\*ALSO ADMITTED IN WYOMING  
\*\*ALSO ADMITTED IN COLORADO

[REDACTED]  
[REDACTED] X, [REDACTED]  
[REDACTED] O  
[REDACTED] S  
[REDACTED]  
[REDACTED]  
[REDACTED]

February 14, 2007

VIA US MAIL

[REDACTED]  
Assistant US Attorney  
500 South Australian Ave  
Ste 400  
West [REDACTED]

[REDACTED] *Grand Jury Subpoena*

Dear Ms. [REDACTED]:

By agreement, on January 25, 2007, [REDACTED] and [REDACTED] served me with a grand jury subpoena for my client, [REDACTED] to appear on February 13, 2007. I indicated that [REDACTED] would assert her rights under the Fifth Amendment and on consent, the appearance has been extended. You have asked me to set out the basis for my request and that you apply through appropriate channels for a formal grant of use immunity for [REDACTED]. I do so here.

As I indicated to you when we conversed last week, [REDACTED] is no longer employed by Mr. Epstein, but has read much of what can be found on the Internet about the investigation of Mr. Epstein. From that review, she is aware that the police considered charging several persons close to Mr. Epstein, including at least one employee. Given that, and the seemingly broad scope of the investigation, [REDACTED] asserts her rights under the Fifth Amendment.

Indeed, considering that both the state authorities in Palm Beach County and your office are conducting investigations, there is every reason for her to be concerned and therefore to assert her constitutional rights. If you continue to want her to appear before a grand jury, be advised that she will assert



U.S. Department of Justice

United States Attorney  
Southern District of Florida

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500 South Australian Ave., Suite 400  
West Palm Beach, FL 33401  
(561) 820-8711  
Facsimile: (561) 820-8777

January 24, 2007

DELIVERY BY HAND

Bruce M. Lyons  
Lyons and Sanders  
600 Northeast 3rd Avenue  
Fort Lauderdale, FL 33304

Re: Federal Grand Jury Subpoena

Dear Bruce:

A new grand jury has been empaneled and I have enclosed a new subpoena for [REDACTED]. As I mentioned earlier, [REDACTED] is not a target of this investigation and the United States seeks her testimony solely as a witness. During our last conversation regarding [REDACTED], you indicated that she was unwilling to speak with us pursuant to a *Kastigar* letter. Please confer with her to confirm whether this remains her position. If [REDACTED] is not amenable to an informal meeting, she must still appear pursuant to the subpoena so that I may ask her questions that would not require the invocation of the Fifth Amendment. If she still invokes, I intend to move to compel her answers. If you or your client is unavailable on February 6, 2007, please let me know of another Tuesday when you are available.

I also am concerned about a potential conflict of interest in your representation of [REDACTED]. In case of future litigation regarding this issue, please provide me with information regarding who is paying (directly or indirectly) for your services on behalf of [REDACTED], the scope of your representation, and whether you are taking direction on this matter from anyone other than [REDACTED]. If any formal or informal joint defense agreements exist, whether in writing or otherwise, please provide a copy of such agreements. If the agreement is purely oral, please provide a written summary of its terms.

BRUCE LYONS, ESQ.  
JANUARY 24, 2007  
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I look forward to your response.

Sincerely,  
R. Alexander Acosta  
United States Attorney

By:



# United States District Court

SOUTHERN DISTRICT OF FLORIDA

TO: [REDACTED]

## SUBPOENA TO TESTIFY BEFORE GRAND JURY

FGJ 07-103(WPB)-Tues./No. OLY-24-3

SUBPOENA FOR:

PERSON

DOCUMENTS OR OBJECT[S]

**YOU ARE HEREBY COMMANDED** to appear and testify before the Grand Jury of the United States District Court at the place, date and time specified below.

PLACE: United States District Courthouse 701 Clematis Street West Palm Beach, Florida 33401	ROOM: Grand Jury Room
	DATE AND TIME: February 6, 2007 1:00 pm*

**YOU ARE ALSO COMMANDED** to bring with you the following document(s) or object(s):

Any and all records related to your employment with Jeffrey Epstein, including but not limited to paystubs, W-2 forms, correspondence, employment applications, and employment reviews. Any and all information regarding methods to contact Jeffrey Epstein directly or via any secretaries/assistants from 1/1/2004 to the present, including but not limited to, telephone numbers, cellular telephone numbers, Blackberry addresses, e-mail addresses, and mailing addresses. Any and all information regarding appointments for massages performed on Jeffrey Epstein in Palm Beach, Florida or elsewhere.

\*Please coordinate your compliance with this subpoena and confirm the date and time, and location of your appearance with Special Agent [REDACTED], Federal Bureau of Investigation, Telephone: [REDACTED].

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

CLERK		DATE:
(BY) DEPUTY CLERK		January 23, 2007

This subpoena is issued upon application

[REDACTED]

Name, Address and Phone Number of Assistant U.S. Attorney  
[REDACTED], Assistant U.S. Attorney  
500 So. Australian Avenue, Suite 400  
West Palm Beach, FL 33401-6235  
Tel: [REDACTED]