

Villafana, Ann Marie C. (USAFLS)

From: Oosterbaan, Andrew
Sent: Wednesday, August 08, 2007 5:53 PM
To: Villafana, Ann Marie C. (USAFLS)
Subject: RE: Epstein

Thanks very much, Marie. And, you'll have all the help from us you want. If you guys end up wanting a CEOS attorney on the team, the assignment might be different than if we're just helping with motions and responses (which would be fine). So, for now, if you need anything or want to discuss the case just contact me and I'll make sure you get what you need. Of course, feel free to contact Myesha directly if you think she can better assist you because of her background on a particular issue you've already discussed with her.

Thanks again.

From: Villafana, Ann Marie C. (USAFLS) [mailto:Ann.Marie.C.Villafana@usdoj.gov]
Sent: Wednesday, August 08, 2007 4:26 PM
To: Oosterbaan, Andrew
Subject: Epstein

Hi Drew – I have attached a plea term sheet and the guideline calculation that was given to Mr. Epstein's attorneys on July 31st. Lilly's letter of August 2nd is sort of in response to that.

Several months ago when the pros memo was first sent to you, you mentioned adding a CEOS attorney to the team. We probably should wait until this attempt at plea negotiations is finished, but I hope to have a few motions/responses "in the bag" before I indict. The two that spring to mind most readily are an appeal to the district court if he is released on bond and a response to a motion to dismiss the indictment on the basis that one or all of the statutes is unconstitutional. Myesha Braden and I have spoken about the case a few times when I was doing research, and she has been wonderful, but if there is someone else that you think would be better, I am all up for the help.

Thank you.

<<FEDERAL SENTENCING GUIDELINES CALCULATION(Using November 1.wpd)>> <<Conf Plea Negotiations final.wpd>>

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